17<sup>th</sup> Oct., 2022

Counsel for the petitionert present. Mr. Kabirullah Khattak, Addl. AG alongwith Tauseef Ahmad, ADEO for the respondents present.

Learned counsel for the petitioner seeks adjournment in order to further prepare the brief. Adjourned. To come up for further proceedings on 04.11.2022 before S.B.

(Kalim Arshad Khan) Chairman 15.07.2022

Learned counsel for the petitioner present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Implementation report not submitted. Learned Additional Advocate General seeks time to contact the respondents for submission of implementation report. Adjourned. To come up for implementation report on 02.09.2022 before S.B.

(MIAN MUHAMMAD) MEMBER(E)

02.09.2022

Learned counsel for the petitioner present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General alongwith Mr. Touseef Ahmed, ADEO for the respondents present.

In pursuance of the judgement of Service Tribunal dated 11.11.2021, the respondent department conducted requiar inquiry against the petitioner. In the light of recommendations of the inquiry committee, the petitioner could not be reinstated in service and the earlier impugned order dated 22.11.2017 has been kept intact. Implementation report containing the inquiry report and connected documents placed on file. Copy thereof provided to learned counsel for the petitioner. Learned counsel for the petitioner requested for adjournment so as to gain time to go through the reply/implementation report. Adjourned. To come up for further proceedings on 17.10.2022 before S.B.

(Mian Muhammad) Member (E)

## Form- A FORM OF ORDER SHEET

Court of	
Execution Petition No.	116/2022

Date of order proceedings  Order or other proceedings with signature of judge  2  3
The execution petition of Mst. Nighat Seema submitted to by Naila Jan Advocate may be entered in the relevant register and
up to the Court for proper order please.
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This execution petition be put up before to Single Bench Peshawar on $17-05-2022$ . Original file be requise
Notices to the appellant and his counsel be also issued for the d
fixed.
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CHAIRMAN
17.05.2022 Learned counsel for the petitioner present.
Notice of the present execution petition be
issued to the respondents for submission of
implementation report on 15.07.2022 before S.B.
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(MIAN MUHAMMAD) MEMBER (E)

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution petition No. 16 /2022

In

Service Appeal No: 1380/2018

Mst Nighat Seema

## $V_{ersus}$

Secretary E & SE KP Peshawar & Others

## **INDEX**

S#	Description of Documents	Annex	Pages
1.	Execution Petition with Affidavit		1-3
2.	Addresses of Parties		4
3.	Copy of Judgment	"A"	5-14
4.	Wakalat Nama		15

Dated: 16/02/2022

Petitioner

Through

Advocate, High Court

Peshawar

Naila Jan

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution petition No./16\_/2022

In

Service Appeal No: 1380/2018

Service Tribunal
Stary No. 3-6

Diary No. 16/02/2-22

Mst. Nighat Seema D/o Raz Muhammad R/o Noor Bahar Colony No.1, District Charsadda.

....Petitioner

## $V_{\rm ersus}$

- 1. The Secretary, Elementary & Secondary Education, Government of Khyber Pakhtunkhwa, \_ Peshawar.
- 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer, Female, Charsadda.
- 4. District Education Officer (F), Batagram.

.....Respondents

EXECUTION PETITION FOR IMPLEMENTATION OF THE JUDGMENT OF THIS HON'BLE TRIBUNAL IN APPEAL No. 1390/2018 DECIDED ON 11-11-2021

## Respectfully Sheweth,

- 1. That the above mention appeal was decided by this Hon'ble Tribunal vide Judgment dated 11/11/2021. (Copy of the judgment is annexed as annexure "A")
- 2. That the relevant portion of the judgment is reproduced "In view of the above discussion, the appeal in hand as well as connected Service Appeal bearing No. 1380/2018 titled "Nighat Seema Versus The Secretary Elementary and Secondary Education Government of Khyber

Pakhtunkhwa and three others" and Service Appeal bearing No: 1390/2018 titled Shama Begum Versus Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar and four others", are allowed by setting-aside the impugned orders and the matter is remitted to the respondents to conduct regular inquiry into the matter within a period of 90 days of receipt of copy of this judgment. Needless to mention that the appellants shall be associated with the inquiry by providing them fair opportunity of defending themselves. Keeping in view the peculiar nature controversy in question, no order regarding release of salaries of the appellants could be passed at this stage, which of course would be subject to outcome of the inquiry. Findings in this judgment shall have no bearing upon the criminal case registered vide FIR No. 02/2017 Police Station Anti-Corruption Establishment Charsadda. Parties are left to bear their own costs. File be consigned to the record room".

- 3. That the Petitioner after getting of the attested copy of same approached the Respondents several time for implementation of the above mention judgment. However they are using delaying tactics and reluctant to implement the judgment of this Hon'ble Tribunal.
- 4. That the Petitioner has no other option but to file the instant petition implementation of the judgment of this Hon'ble Tribunal.
- 5. That there is nothing which may prevent this Hon'ble Tribunal from implementing of its own judgment.

It is, therefore, requested that on acceptance of this petition the Respondents may directed to implement the judgment of this

Hon'ble Tribunal by reinstating the Petitioner with all back benefits.

Dated: 16/02/2022

F

Digate au Petitioner

Through

Naila Jan

Advocate, High Court

Peshawar

### AFFIDAVIT:-

I, Mst. Nighat Seema D/o Raz Muhammad Bahar Colony No.1, R/o Noor Charsadda, do hereby solemnly affirm and declare on oath that all the contents of above application are true and correct to the best of my knowledge and belief and nothing has been misstated or concealed from this Hon'ble Court.

Deponent



## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution petition No. \_\_\_\_/2022

In

Service Appeal No: 1380/2018

Mst Nighat Seema

## $m V_{ersus}$

Secretary E & SE KP Peshawar & Others

## **ADDRESSES OF PARTIES**

### **PETITIONER**

Mst. Nighat Seema D/o Raz Muhammad R/o Noor Bahar Colony No.1, District Charsadda

## RESPONDENTS

- 1. The Secretary, Elementary & Secondary Education, Government of Khyber Pakhtunkhwa, Peshawar.
- 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer, Female, Charsadda.

4. District Education Officer (F), Batagram

Dated: 16/02/2022

Through

Naila Jan / / Advocate, High Court

Peshawar

**B** 1)

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

S.A 1380 /2019

Kinder Pakhtukhva Service Tribunal

Diary No. 1617

Dated 08/11/20/

Nighat Seema D/O Raz Muhammad R/o Noor Bahar Colony No.1 District Charsadda.

Appellant

## **VERSUS**

- √1. The secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa.

  □ Taleaction Taleaction
- √2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- √3. District Education officer Female Charsadda.
- 4. District Education Officer Female Batagram.

Respondents

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THE KHYBER OF APPEAL U/S PAKHTUNKHWA SERVICE TRIBUNAL ACT, THE ORIGINAL ORDER 1974 AGAINST DATED 22/11/2017, WHEREBY SERVICES OF THE APPELLANT WAS DISPENSED, WHICH RULES. LAW, THE AGAINST IS PRINCIPLES OF NATURAL JUSTICE, VOID ABINITIO IS NOT APPLICABLE ON THE RIGHTS OF THE APPELLANT

## PRAYERS:-

ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED 22/11/2017 MAY

Char

11.11.2021

Ms. Naila Jan, Advocate, for the appellant present Additional Advocate General for Khattak, Kabirullah respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, placed on file of Service Appeal bearing No. 550/2018 titled "Mst. Zia Gul Versus Government of Khyber Pakhtunkhwa, through Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and three others", the instant appeal is allowed by setting-aside the impugned order and the matter is remitted to the respondents to conduct regular inquiry into the matter within a period of 90 days of receipt of copy of this judgment. Needles to mention that the appellant shall be associated with the inquiry by providing him fair opportunity of defending himself. Keeping in view the peculiar nature of controversy in question, no order regarding release of salary of the appellant could be passed at this stage, which of course would be subject to outcome of the inquiry. Findings in this judgment shall have no bearing upon the criminal case registered vide FIR No. 02/2017 Police Station Anti-Corruption Establishment Charsadda. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 11.11.2021

(Atig-Ur-Rehman Wazir) Member (E)

(Salah-Ud-Din) Member (J)

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## BEFORE THE KPK SERVICE TRIBUNAL

**PESHAWAR** 

Service Appeal No: 550

Khyber Pakhtukhwa Service Tribunal

Dated 17/04/2018

Mst Zia Gul (Drawing Master BPS-15) Wife of Hamayoun abil Rahman
Resident of Mohallah Painda Khel Tehsil & District Charsadda
\_\_\_\_\_(Appellant)

#### **VERSUS**

- 1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education KPK, Peshawar
- / 2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Exporty

Wid order

Dated 22-4-4, 4.

District Education Officer (DEO) District Battagram

District Education Officer (DEO) (Female) District Charsadda

-----(Respondents)

Fiedto-day
Registrar
17/4/10

90 DAYS

SERVICE APPEAL UNDER SECTION 4 OF THE KPK
SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER
DATED 22/11/2017 OF RESPONDENT NO.4 WHEEREBY
SERVICE OF THE APPELLANT HAS BEEN DISPENSED
AND THE DEPARTMENTAL APPEAL OF THE APPELLANT
HAS NOT BEEN RESPONDED IN STIPULATED PERIOD OF

## BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWA

Service Appeal No. 550/2018

Date of Institution 17.04.2018

Date of Decision

... 11.11.2021

Mst. Zia Gul (Drawing Master BPS-15) Wife of Hamayoun Abil Rahman Resident of Mohallah Painda Khel Tehsil & District Charsadda.

(Appellant)

### **VERSUS**

Khyber Pakhtunkhwa, through Secondary Education Khyber Pakhtunkhwa, Elementary & Peshawar and three others.

(Respondents)

MR. MOHIB JAN SALARZAI, Advocate

(For appellant Service Appeal No.550/2018).

MS. NAILA JAN, Advocate

(For appellants in Service Appeals No. 1380/2018 & 1390/2018).

MR. KABIRULLAH KHATTAK, Additional Advocate General

For respondents.

MR. SALAH-UD-DIN MR. ATIQ-UR-REHMAN WAZIR

MEMBER (JUDICIAL) MEMBER (EXECUTIVE)

## JUDGMENT:

## SALAH-UD-DIN, MEMBER:-

Through this single judgment we intends to dispose of instant Service Appeal as well as connected Service Appeal bearing No. 1380/2018 titled "Nighat Seema Versus the Secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa and three others" and Service Appeal bearing No. 1390/2018 titled "Mst. Shama Begum Versus Director Elementary and Secondary Education Khyber





Pakhtunkhwa Peshawar and four others", as common question of law and facts are involved therein.

Brief facts as alleged by the appellant in the instant service appear are that certain posts of Drawing Masters were advertised through newspaper in the year 2006; that as the appellant was eligible and qualified for the said post, therefore, she applied for the same and was properly appointed vide appointment order dated 14.03.2006 issued upon recommendations of the Departmental Selection Committee after fulfilling of all legal and codal formalities; that the appellant was initially posted at Government Girls Middle School Thakot and was later on transferred to District Charsadda vide order dated 27.10.2011; that the salary of the appellant was astonishingly stopped in the month of January 2017, therefore, she filed Writ Petition in the august Peshawar High Court, Peshawar, seeking release of her salary; that vide order dated 14.09.2017, august Peshawar High Court, Peshawar directed the Director Anti-Corruption Khyber Pakhtunkhwa for probe into the matter and to submit his report in the court; that the Director Anti-Corruption instead of submitting his report in the Worthy High Court, straightaway registered FIR against the appellant as well as others, which has been challenged through filing of Writ Petition before august Peshawar High Court, Peshawar, wherein interim relief has been granted and the matter is still sub-judice; that the District Education Officer (Female) District Charsadda did not conduct any departmental inquiry and straightaway issued the impugned office order dated 22.11.2017, whereby the service of the appellant was dispensed with; that the impugned order dated 22.11.2017 was challenged through filing of departmental appeal, however the same was not responded within the statutory period, hence the instant service appeal.

3. Precise facts as alleged by the appellant in Service Appeal No. 1380/2018 are that she was appointed as Arabic Teacher vide order dated 01.09.2009 issued by the

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competent Authority and she was posted in Government Girls Middle School Gidri Khairabad District Battagram; that the appellant performed her duty with zeal and zest and was later on transferred to Government Girls Middle School Amir Abad Daki District Charsadda; that vide order dated 04.12.2012 the appellant was posted as Arabic Teacher in Government Girls High School Dadu Kally; that upon transfer of the appellant from District Battagram to District Charsadda, District Education Officer (Female) Battagram issued letter dated 09.01.2013, whereby the service as well as Educational documents of the appellant were verified, where-after District Education Officer (Female) Charsadda issued letter dated 16.01.2013 for release of salary of the appellant; that the appellant was receiving her salary, however all of a sudden, impugned order dated 22.11.2017 was issued, whereby service of the appellant was dispensed with; that the appellant challenged the same through filing of departmental appeal, which was not responded, therefore, the appellant filed the instant service appeal for redressal of her grievance.

J. . . .

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Briefly stated the facts as alleged by the appellant in Service Appeal bearing No. 1390/2018 are that she had successfully completed/passed the required course of PTC Program in the year 1998 and was subsequently appointed as trained PTC vide order dated 07.05.2003 issued by Agency Education Officer Khyber Agency; that the appellant was posted in Government Girls Primary school Akakhel Bara Khyber Agency and was later on transferred to Government Girls Primary School Pemall Sharif Battagram, where she performed her duty with zeal and zest; that the appellant was then transferred to District Charsadda and served in various schools; that the Educational documents as well as appointment order of the appellant were verified by the concerned officer during her transfer from one school to another; that while serving in Government Girls Primary School Pegham Koroona District Charsadda, impugned order dated 22.11.2017 was issued, whereby the service of the appellant was dispensed with; that the same was challenged by the appellant through filing of departmental appeal, which was rejected on 29.02.2017 and communicated to the appellant on 05:10.2018, hence the instant service appeal.

- 5. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellants in their appeals.
- Mr. Mohib Jan Salarzai, Advocate, representing the appellant in the instant service appeal has contended that the appellant was properly appointed as Drawing Master by the competent Authority upon approval of District Selection Committee; that the appellant has served in various schools and has rendered services in the Education Department for more than 11 years and was also receiving her salary till illegal stoppage of the same by the respondents in the month of January 2017; that the appellant had filed Writ Petition No. 2028-P/2017 in the august Peshawar High Court, Peshawar seeking release of her salary; that during the proceedings in the aforementioned Writ Petition, august Peshawar High Court, Peshawar referred the matter to Anti-Corruption Department with the directions to probe into the matter and submit its report, however instead of submitting its report, Circle Officer Anti-Corruption Establishment Charsadda directly registered FIR against the appellant as well as others, which has been challenged through filing of Writ Petition and interim relief has been granted to the the departmental Authority has appellant; that conducted any inquiry against the appellant and has directly issued the impugned order, whereby services of the appellant were dispensed with by wrongly and illegally mentioning in the column of remarks that the same was done in light of judgment rendered in Writ Petition No. 2028-P/2017 because the said Writ Petition was dismissed being infructuous; that no regular inquiry was conducted in the matter and the appellant was condemned unheard; that upon transfer of the appellant to various schools, the

<u>J.:/.</u>

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concerned officers have verified the appointment order as well as service record of the appellant through written letters; that the impugned order being wrong and illegal is liable to be set-aside and the appellant is entitled to be reinstated in service with all back benefits. Reliance was placed on 2004 SCMR 303, 2009 SCMR 412, 2009 SCMR 663, 2011 SCMR 1220, 2004 SCMR 468 and 1997 SCMR 1552.

- 7. Ms. Naila Jan, Advocate, representing the appellants in connected Service Appeals No. 1380/2018 and 1390/2018 has relied upon the arguments advanced by learned counsel for the appellant in the instant service appeal.
- On the other hand, learned Additional Advocate General for the respondents has contended that after a thorough inquiry into the matter, the appointments as well as all record pertaining to the service of the appellants were found fake and bogus; that the appellants were associated in the inquiry and proper opportunity of self defence as well as personal hearing were provided to them; that the inquiry officer has found the appointment orders of the appellants as fake and recommended that FIR may be registered against the appellants and the salaries received by them may be recovered and refunded in the government exchequer; that a proper legal inquiry was conducted into the matter by complying all legal and codal formalities, therefore, the impugned order may be kept intact and the appeals in hand may be dismissed. Reliance was placed on judgments dated 28.01.2019, 09.08.2017 and 13.01.2021 rendered by this Tribunal in Service Appeals No. 540/2014, 161/2014 and 13/2018 respectively.
- 9. We have heard the arguments of learned counsel for the appellants as well as learned Additional Advocate General for the respondents and have perused the record.
- 10. A perusal of the record would show that the appellants have alleged that they were properly appointed upon the

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ATTESTED

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recommendations of Departmental Selection Committee and they had served for so many years in various schools, however vide impugned order dated 22.11.2017, their services were dispensed with without any regular inquiry being conducted by the competent Authority. A bare perusal of the impugned order dated 22.11.2017 would show that the same was not passed in light of any regular inquiry conducted into the matter upon order of the competent Authority. The appellants have allegedly rendered services for considerable long period, therefore, it was incumbent upon the competent Authority to have conducted a proper inquiry into the matter prior to declaring the appointment orders of the appellants as fake. The appellants have not been afforded fair opportunity to defend themselves. The competent Authority has though given reference of court judgments rendered in Writ Petitions No. 2028-P/2017 and 4738-P/2017 in the column of remarks of the impugned orders, however the respondents have failed to produce any such judgments, whereby august Peshawar High Court, Peshawar had ordered for dispensing with the services of the appellants.

In view of the above discussion, the appeal in hand as, well as connected Service Appeal bearing No. 1380/2018 titled "Nighat Seema Versus The Secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa and three others" and Service Appeal bearing No. 1390/2018 titled "Mst. Shama Begum Versus Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar and four others", are allowed by setting-aside the impugned orders and the matter is remitted to the respondents to conduct regular inquiry into the matter within a period of 90 days of receipt of copy of this judgment. Needles to mention that the appellants shall be associated with the inquiry by providing them fair opportunity of defending themselves. Keeping in view the peculiar nature of controversy in question, no-order regarding release of salaries of the appellants could be passed at this stage, which of course

would be subject to outcome of the inquiry. Findings in this judgment shall have no bearing upon the criminal case registered vide FIR No. 02/2017 Police Station Anti-Corruption Establishment Charsadda. Parties are left to bear their own costs. File be consigned to the record room.

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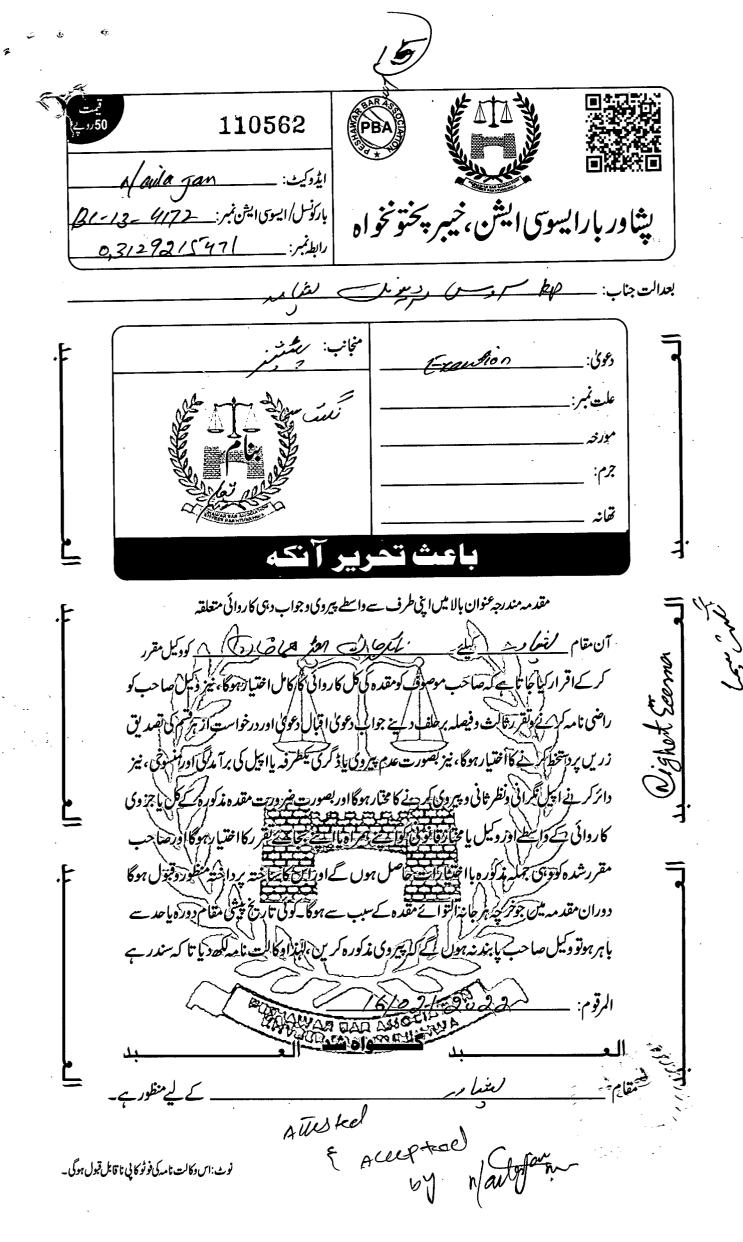
11.11.2021

(SALAH-UD-DIN) MEMBER (JUDICIAL)

(ATIO-UR-REHMAN WAZIR) MEMBER (EXECUTIVE)

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

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. Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

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The hours of attendance in the court are the same that of the High Court except Sund-  $\gamma$  and Gazetted Holidays. Always quote Case No. While making any correspondence.

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# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD J.B. PESHAWAR.

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1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.

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## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROADS BESHAWAR

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## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

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Province Service Tribunal Act, 19 the above case by the petitioner in hereby informed that the said a *on	974, has been presented/renthis Court and notice has appeal/petition is fixed for at 8.00 A.M. If you wish berty to do so on the date for in person or by authors power of Attorney. You are fore the date of hearing upon which you rely. Placed the date fixed and in the decided in your absence. It the date fixed for hearing You should inform the Renaddress your address con on will be deemed to be your sistered post will be deemed.	egistered for sheen order representation and representations of the same after the representations of the same and	or consideration, in red to issue. You are efore the Tribunal ything against the other day to which entative or by any e, required to file in written statement ake notice that in orementioned, the heal/petition will be any change in your his notice which the ddress, and further at for the purpose of
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The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays. Always quote Case No. While making any correspondence.

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# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, SPESHAWAR.

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No.	Appeal N	Ebu	0116	of 30	75

Province Service Trihunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribumal on the perimoner you are at 8.00 A.M. If you wish to urge anything against the appellant/perimoner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal petition.

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Rhyber Pakhtunkhwa Service Tribunal: Peshawar.

## "B"

# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, BESHAWAR.

MSt: Nighat Seema	of 20 2.2
Mst. Nighat Seema	Appellant/Petitioner
the Your ERSE KPK losh	Respondent
Notice to: —  Respondent No  Respondent No	Do shawas
WHEREAS an appeal/petition under the provision of Province Service Tribunal Act, 1974, has been presented/registhe above case by the petitioner in this Court and notice has be hereby informed that the said appeal/petition is fixed for hereby informed that the said appeal/petition is fixed for hereby informed that the said appeal/petition is fixed for hereby informed that the said appeal/petition is fixed for hereby informed that the said appeal/petition is fixed for hereby informed that the said appeal/petition of hereby to do so on the date fixed the case may be postponed either in person or by authorise Advocate, duly supported by your power of Attorney. You are, this Court at least seven days before the date of hearing 4 calongwith any other documents upon which you rely. Please default of your appearance on the date fixed and in the manapeal/petition will be heard and decided in your absence.	stered for consideration, in enordered to issue. You are caring before the Tribunal urge anything against the d, or any other day to which d representative or by any herefore, required to file in opies of written statement se also take notice that in
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Khyher Pakhti	Registrar, ınkhwa Service Tribunal,

Peshawar.

2. Always quote Case No. While making any correspondence.

<sup>1.</sup> The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.

## KHYBER F AKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDI CIAL COMPLEX (OLD), KHYBER ROADS.B PESHAWAR.

No.	
	Appeal No. E.P. No. 116 of 2022  MSt: Nighat Seema Appellant/Petitioner
	MSt: Nighat Seema Appellant/Politioner
	Versus
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	Respondent No. 3
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the appropriate ap	WHEREA'S an appeal/petition under the provision of the Khyber Pakhtunkhwa whee Service Tribunal Act, 1974, has been presented/registered for consideration, in above case by the petitioner in this Court and notice has been ordered to issue. You are the informed that the said appeal/petition is fixed for hearing before the Tribunal at 8.00 A.M. If you wish to urge anything against the ellant/petitioner you are at liberty to do so on the date fixed, or any other day to which case may be postponed either in person or by authorised representative or by any ecate, duly supported by your power of Attorney. You are, therefore, required to file in Court at least seven days before the date of hearing 4 copies of written statement gwith any other documents upon which you rely. Please also take notice that in all of your appearance on the date fixed and in the manner aforementioned, the cal/petition will be heard and decided in your absence.  Notice of any alteration in the date fixed for hearing of this appeal/petition will be not your by registered post. You should inform the Registrar of any change in your
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this	appeal/petition.
	Copy of appeal is attached. Copy of appeal has already been sent to you vide this
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	Given under my hand and the seal of this Court, at Peshawar this
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o's	Peport  Registrar,  Khyber Pakhtunkhwa Service Tribunal,
1	Q eport Registrar,
	> Khyber Pakhtunkhwa Service Tribunal, Peshawar.

The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
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## KHYBER IN KHTUNKHWA SERVICE TRIBUNAL, PESIIAWAR.

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The hurrs of attendance in the court are the same that of the High Court-except Sunday and Gazetteg Holidays, Always quote Case No. While making any correspondence.

Registrar,

Skhyber Pakhtunkhwa Service Tribunal, Peshawar,



#### SUBJECT: Implementation reporte

#### Memo:

- (1) That the Hon'ble Khyber Pukhtun Service Tribunal Peshawar (1) S/Appeal No 1639/2019,titled Mst Nazma Ali,(2) S/Appeal NO,1380/2019 titled Mst Nighat Seema (3) S/Appeal No,550/2018 Mst Zia Gul (4) S/Appeal NO,1390/18 Mst Shama Begum V/S Government of Khyber Pukhtun khwa E&SE department Peshawar, were remanded to the Competent authority for de novo proceeding vide judgment dated 11-11-2021.
- (2) That de novo proceeding were conducted in compliance with judgment of the Hon,ble service tribunal and the petitioners/Appellants were removed from service vide Endst NO, 12025-30 dated 16-06-2022. (Copies Appended)
- (3) That the respondent department filed CPLAs against the said Judgments vide CPLAs NO,55, 56.57,58-P/2022

it is therefore humbly requested that the Judgments dated 11-11-201 has been Implemented as such Execution petitions may very graciously be Consigned please.

DISTRICT EDUCATION OFFICER
/ (FEMALE) CHARSADDA



## Office of the District Education Officer Female Dístríct Charsadda

0919220086 emischarsadda.deof@yahoo.com

Dated 20

#### Notification

In the light of the Judgment passed by the Hon, ble Service Tribunal on 11-11-2021 with others (3) club cases, the competent authority is pleased to reinstate the following teachers for the purpose of de novo enquiry only.

S.No.	Name of teacher	School names
1	Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
2	Mst shama begum Ex-PST	GGPS pigham Charsadda
3	Nighat seema Ex AT	GGHS Dadu killi Charsadda
4	Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda

DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

Endst NO 6721 - 4 dated----

### Copy for information

- (!) PA to director E&SE khber pukhtoon khwa
- (2) Mst Nazma Ali Ex-CT GGMSRajjar Charsadda.
- (3) Mst Shama begum EX-PST GGPS Pigham killi Charsadda.
- (4) Mst Nighat seema EX-AT GGHS Dadu killi Charsadda.
- (5) Mst Zia Gul EX- DM- GGMS dheri I tameed Mian Charsdda.
- (6) office file.

(FEMALE) CHARSADDA



# Office of the District Education Officer Female District Charsadda

	0919220086	emischarsadda.deof@yahoo.com					
<i>No.</i>		/	Dated_	16	106	2022	

#### **OFFICE ORDER**

In Compliance of the Judgment dated 11-11-2021 titled Nazma Ali others (3) club cases passed by the Hon, ble Service tribunal with the consultation and recommendation of the Enquiry committee discussed herein above the undersigned in the capacity of being competent authority and the instant cases of the considered opinion that the following appellants are not entitled to reinstate against the posts in question. Moreover notification been Endst Nos 1508-15 dated 19-07-2019 and Endst No, 10644-46 dated 22-11-2017 of the ExDEO (F) Charsadda are hereby maintained in the interest of public service please.

S.No.	Name of teachers	School names
1	Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
2	Mst shama begum Ex-PST	GGPS pigham Charsadda
3	Nighat seema Ex AT	GGHS Dadu killi Charsadda
4	Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda

DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA

12025-30	16	a C
Endst NO-/1011-30	dated/	/2022

#### Copy for information

- (1) PA to director E&SE khber pukhtoon khwa
- (2) Mst Nazma Ali Ex-CT GGMSRajjar Charsadda.
- (3) Mst Shama begum EX-PST GGPS Pigham killi Charsadda.
- (4) Mst Nighat seema EX-AT GGHS Dadu killi Charsadda.
- (5) Mst Zia Gul EX- DM- GGMS dheri Hameed Mian Charsdda.

(6) office file.

DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA





## DIRECTORATE ELEMENTARY & SECONDERY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWAH PESHAWAR

Phone No: 091-9225339, Fax # 091-9219936

No\_<del>7671</del>/AD (Lit-II)

Dated Peshawar the \( \to \to /o \) /2022

To

The District Education Officer, (Female) Charsadda.

Subject: -

SERVICE APPEAL NO. 1639/2019 TITLED BY MST. NAZÍMA ALI SERVICE APPEAL NO. 1390/2018 BY MST. SHAMA BEGUM, SERVICE APPEAL NO. 1380/2019 TITLED BY NIGHAT SEEMA SERVICE APPEAL NO. 550/2018 TITLED BY ZIA GUL.

Memo:

I am directed to refer you letter No. 8158 dated 03-03-2022 on the subject cited above & to intimate you that vide Notification bearing Endst No. 469-72/F. No. Lit-II Charsadda Nazima Ali/SA: 1639/19 dated 16-03-2022, inquiry has been conducted in the titled cases by this Directorate E&SE on your request vide the above cited letter.

In this regard, the Chairman of inquiry committee has submitted inquiry report vide letter No. 723 dated 28-04-2022 consisting of 5 pages & 24 Annexures is hereby forwarded with the directions that an appropriate action may be taken pursuant to the recommendation of the inquiry report immediately being a competent authority under the intimation of this Directorate E&SE Khyber Pakhtunkhwa Peshawar please.

ASSISTANT DIRECTOR (LIT: II)

Fndst	No:	1
P.H.C.S.L.	IN (I.	- 1

Dated Peshawar the: \_\_\_/\_\_\_/202

Copy forwarded for information to the:-.

1. Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.

2. Principal GHSS Musazia Peshawar.

3. Deputy District Education Officer (Male) Mohmand.

- 4. Deputy Director (Legal) E&SE Khyber Pakhtunkhwa Peshawar.
- 5. Deputy Directress (Estab/F-I) E&SE Khyber Pakhtunkhwa Peshawar.
- 6. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
- 7. Master file.

ASSISTANT DIRECTOR (LIT: II)



## OFFICE OF THE PRINCIPAL GHSS MOSA ZAI PESHAWAR

No 723 /Inquiry Charsadda (F)

Dated: 28 /4/2022

To

The Director

Elementary & Secondary Education KP Peshawar.

SUBJECT: INQUIRY REPORT REGARDING SERVICE APPEAL NO1639/2019 TITLED MST NAZMA ALI, SERVICE APPEAL NO 1390/2018 TITLED MST SHAMA BEGUM, SERVICE APPEAL NO 1380/2019 TITLEDNIGHAT SEEMA AND SERVICE APPEAL NO 550/2018 TITLED ZIA BEGUM

R/Sir,

Kindly refer to your office Notification No 469-72 dated 16/3/2022, enclosed please find herewith Inquiry Report consisting of 5 pages and 24 Annexures is submitted to your goodself for further necessary action please.

Skabeer Ahmad

PRINCIPAL GHSS Mosa zai Peshawar

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## OFFICE OF THE PRINCIPAL GHSS MOSA ZAI PESHAWAR

No 723 /Inquiry Charsadda (F)

Dated: 28 /4/2022

To

The Director

Elementary & Secondary Education KP Peshawar.

SUBJECT: INQUIRY REPORT REGARDING SERVICE APPEAL NO1639/2019 TITLED MST NAZMA ALI, SERVICE APPEAL NO 1390/2018 TITLED MST SHAMA BEGUM, SERVICE APPEAL NO 1380/2019 TITLEDNIGHAT SEEMA AND SERVICE APPEAL NO 550/2018 TITLED ZIA BEGUM

R/Sir,

Kindly refer to your office Notification No 469-72 dated 16/3/2022, enclosed please find herewith Inquiry Report consisting of 5 pages and 24 Annexures is submitted to your goodself for further necessary action please.

Shabeer Ahmad

PRINCIPAL GHSS Mosa zai Peshawar

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#### IMPRODUCTION:

The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar constituted the following committee vide his office Notification No 469-72 dated 16/3/2022 received on 29/3/2022 to probe as per report of the DEO(F) Charsadda letter No 8158 dated 3/3/2022 regarding Service Appeal No1639/2019 titled Mst Nazma Ali, Service Appeal No 1390/2018 titled Mst Shama Begum, Service Appeal No 1380/2019 titled Nighat Seema and Service Appeal No 550/2018 titled Zia Begum.

\* Mr. Shabeer Ahmad Principal (BS-19) GHSS Mosazia Peshawar

Chairman

Mr. Liaqat Ali (Bs-18) DDEO(M) Mohmand

Member

#### \_\_\_\_

Annexure --- 1&2

#### **PROCEEDINGS:**

- ❖ The committee visited the o/o the DEO (F) Charsadda on 31/3/2022 before informing the DEO (F) Charsadda telephonically on 30/3/2022 but it was very sad that she did not bother to attend the committee. However, the Committee was handed over the related record by the Litigation branch.
- ❖ The DEO (F) Charsadda was requested through a letter No 706 dated 8.4.2022 to be present with all the relevant record along with statement in speaking order and also inform the concerned Ex- Teachers to appear before the committee on 12.4.2022 at the o/o the DEO (F) Charsadda.
  Annexure ---03
- ❖ The DEO (F) Charsadda directed all the following 04 Ex- Teachers to appear before the inquiry committee for personal hearing along with all the relevant record/documents on 12/04/2022 at 09:30 AM at the Office of the DEO (F) Charsadda letter No. 9388-89 dated 08/04/2022.
  - i. Mst. Nazma Ali EX-CT GGMS Rajar Charsadda
  - ii. Mst. Shama Begum Ex- PST GGPS Pigham Charsadda
  - iii. Mst. Nighat Seema Ex- AT GGHS Dadu Killi Charsadda
  - iv. Mst. Zia Gul Ex-DM GGMS Dheri Hamid Mian Charsadda

Annexure --- 04

- ❖ The letters were dispatched to the Ex-teachers/petitioners on their home address through registry. Annexure --- 05. The Ex- teachers were also informed telephonically one day before on 11/4/2022 regarding their personal hearing on 12/04/2022.
- The inquiry committee again visited the office of DEO (F) Charsadda on 12/04/2022 as per schedule in order to record the statement of the Ex- teachers and further analyse the available record but none of the Ex- teachers/petitioners turned up for personal hearing till office hours on the said date. Attendance is attached as **Annexure---6**. The DEO (F) Charsadda stated that the four Ex-teachers were called to her office one day before the arrival of the inquiry committee i.e. on 11/4/2022 and asked them to appear before the inquiry committee on 12/4/2022 and handed over the hard copies of her office letter No 9383-87 dated 8/4/2022 in reference to the letter of the inquiry committee but they refused to receive the hard copies. Statement of the DEO (F) Charsadda Mst. Suraya Begum is attached as **Annexure -07**

After scrutinizing the available record and inquiries at the office of DEO (F) Charsadda, the committee gathered the following:

### NAZMA ALI Ex- CT CHARSADDA

## BACK GROUND & ORIGIN OF THE ISSUE:

That Nazma Ali Ex-CT was dismissed from service on the charge of fake appointment vide DEO (F) Charsadda No 1508-15 dated 19/07/2019 upon the recommendation of the inquiry report of Miss Naheed Anjum Deputy Directress E&SE Khyber Pakhtunkhwa Peshawar constituted vide No . 9749-51 dated 26/10/2018. The origin of the issue was that the DEO (F) Charsadda requested for inquiry after the anti-corruption Charsadda sent a letter to her office on 25/9/2017 regarding detail of the teachers who were transferred from other districts and ex FATA from 2006 onward. A letter for verification of service documents was again sent to DEO (F) Batagram vide No 7972 dated 21/7/2017 and reminder for the verification was sent vide No 18919 dated 3/2/2018. The documents were received duly verified vide DEO (F) Batagram No 5390 dated 9/3/2018 bearing signatures like the then DEO (F) Battagram Mst Rehana Yasmin. However, the DEO (F) Charsadda was in doubt and she sent the documents for re verification through email. In reply an email was received from the DEO (F) Battagram in which she told that not only the verification letter was fake but also the



spatch No on the letter did not match with the Dispatch Register.

Annexure---8(Dismissal order) &9 (Inquiry Report).

## FINDINGS OF THE INQUIRY OF Miss NAHEED ANJUM DEPUTY DIRECTRESS E&SE KHYBER PAKHTUNKHWA:

- The appointment order No. 5509-14 dated 28/01/2011 (District Batagram) is fake and bogus.
- Teacher Attendance Register of GGMS Shamlae revealed that she had never been part of that school.
- The salary record was not traceable from Battagram.
- Transfer order issued by the Directorate No. 833-38/A-167/2013 dated 01/03/2013 was also not confirmed as the file was missing in the Directorate.
- The academic documents provided were also not verified by the institutions concerned.
- Verification of all documents also proved fake.
- The ministerial staff in the female DEO office are responsible for the loss or non-production of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

### FILING OF SERVICE APPEAL IN THE KP SERVICE TRIBUNAL PESHAWAR

- ➤ She filed service appeal No.1639/2019 Vide Diary No.1767 dated 4/12/2019 before the KP Service Tribunal Peshawar for her re-instatement
- The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a de-novo inquiry.

#### SHAMA BEGUM Ex-PST CHARSADDA

#### BACK GROUND & ORIGIN OF THE ISSUE:

That Shama Begum was dismissed/dispensed from service vide DEO (F) Charsadda No 10643 dated 22/11/2017 at S# 5 upon the recommendation of the inquiry committee consisting of Mr Muhammad Iqbal BS-19 Principal GHS Badabher District Peshawar and Safdar Khan BS-18 Principal GHS Gulshan Rehman Colony Peshawar which was constituted by the Directorate on the request of the DEO (F) Charsadda Vide her Office No4798 dated 22/6/2017. History of the case was that salary of Mst Shama Begum Ex-PST GGPS Piagham Charsadda was stopped by the then SDEO (F) Charsadda, Miss Nadia (Present DDEO F Peshawar) for the reason that her appointment order and other relevant documents regarding her services were fake as she failed to provide the documents required to the SDEO (F) Charsadda asked vide her office No 219 dated 26/8/2014. That Shama Begum instead of providing the requisite documents to the SDEO concerned knocked at the door of the Honourable Peshawar High Court against the decision of the SDEO (F) Charsadda of her stoppage of pay.

Annexure---10 (Dismissal/Dispensed Order) & 11 (Inquiry Report)

FINDINGS OF THE INQUIRY COMMITTEE CONSISTING OF Mr. MUHAMMAD IQBAL BS-19 PRINCIPAL GHS BADABHER DISTRICT PESHAWAR AND Mr. SAFDAR KHAN BS-18 PRINCIPAL GHS GULSHAN REHMAN COLONY PESHAWAR which is reproduced as under:

- 1) The Agency Education Officer Khyber Agency at Jamrud in his written statement when asked about verification of service documents of Mst Shama Begum Ex-PST GGPS Aka Khel Bara Khyber Agency furnished the following to the inquiry committee:
  - i. The name of the school i.e. GGPS Aka Khel Bara Khyber Agency where the teacher concerned was shown her adjustment on her initial appointment neither exist on the grounds of Khyber Agency nor in the papers of the record of Khyber Agency Education Department i.e. in the SNE of the AEO office of the Khyber Agency.
  - ii. The bogus signature ridiculously appended to the appointment order of Mst Shama Begum has been resembling to the signature of the Ex-AEO Khyber Agency Mr Dilbar Khan but his period of service has been w.c.f 21/03/2004 to 16/8/2005 as is evident from the AEO display board in th office of the AEO.
  - iii. Mr Jahngi Khan remained the AEO of Khyber Agency for the period w.e.f.01/04/2003
  - iv. The bogus signature appended to the LPC of Mst Shama Begum was resembling to the signature of Ex-AEO Khyber Agency Mr. Hashim Khan Afridi which did not match with his specimen signature.
    - v. No record was available regarding appointment/service/salaries of the teacher concerned in the office of the AEO Khyber Agency.
- 2) The Director Education ex FATA Secretariat Peshawar in his written statement has disown the signature appended to the LPC of the teacher concerned.

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- The Director E&SE KP Peshawar in his written statement disown the Endst No and signature appended to the transfe orders in r/o Mst Shama Begum bearing No 12085-97/F.No 103/PTC (F) FATA to settle: dated 13/4/2011 and 3464-69/F.No 51/Gen.Tranfer(F) FATA to settle dated 7/9/2011 and further declared that no record was found regarding her transfer either from FATA to District Battagram or from District Battagram to District Charsadda.
- 4) During the course of inquiry proceedings this inquiry committee came across many other anomalies such as:
  - i. The LPC No 975 dated 31/5/2011 prepared for the month of May, 2011 depicts her Basic Pay Rs 3820 per month which is minimum initial of BPS-09 in May 2011.
  - ii. And the LPC No 129 dated 31/8/2011 prepared for the month of August 2011 depicts her Basic Pay Rs 6200 per month which is minimum initial of BPS-09 in July 2011.
  - iii. Whereas the page No 06 of her Service Book shows her Basic pay Rs 5200 in May 2011 and the Rs 8480 in the August 2011 which is 6<sup>th</sup> stage which she might deserve only after passage of his six long years.
- 5) Looking for her own interest to validate her fake services, the teacher concerned driving the nail aright, ultimately succeeded in her fraudulent plan, when in pursuance of the Director E&SE KP Peshawar Endst No 3464-69F.No 51/Gen.Transfer(F) dated 7/9/2011 she was transferred from District Battagram to GGPS Paigham District Charsadda where her pay was started and she claimed and drew her all undue and illegal arrears w.e.f. 31/5/2011 to 01/09/2011 on the basis of fake documents as evident from the page No 07 of her Service Book and pay Roll for the month of June 2011.
- 6) She was paid normally up to 30/6/2014 till her pay was stopped by the SDEO (F) Charsadda for the doubt of fakeness of her basic service documents.

In short the committee stated that all her documents are bogus.

#### FILING OF SERVICE APPEAL IN THE KP SERVICE TRIBUNAL PESHAWAR

- ➤ She filed service appeal No.1390/2018 Vide Diary No.1585 dated 30/10/2018 before the KP Service Tribunal Peshawar for her re-instatement
- The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a de-novo inquiry.

#### MST. NIGHAT SEEMA EX- AT CHARSADDA

#### BACK GROUND & ORIGIN OF THE ISSUE:

- ★ Mst. Nighat Seema was appointed as AT (BS-09) at GGMS Gidri Khair Abad in Battagram District allegedly on a fake and bogus appointment letter bearing Enst No.3964-70 dated 01/09/2009 by DEO (F) Battagaram.
  Annexure --- 12
- ❖ She was transferred to GGMS Amir Abad Dhaki District Charsadda vide Director E&SE Khyber Pakhtunkhwa Endst No.1766-71 dated 16/11/2012. Annexure --- 13
- ❖ The said teacher was re-adjusted at GGHS Dado Killi Vide DEO E&SE Charsadda Endst No. 2486-90 dated 04/12/2012.
  Annexure---14
- The DEO (F) Charsadda dispensed with the service of Mst. Nighat Seema for allegedly being fake and bogus on 22/11/2017 vide order No.10643.(Already attached as Annexure-10)
- ❖ The said teacher, being aggrieved, submitted a departmental appeal to Director E&SE KP for re-instatement on 20/12/2017.
  Annexure---15
- ❖ In response to a letter for verification of appointment order and service record of Mst. Nighat Seema, the DEO (F) Battagram in a letter to Directorate E&SE Khyber Pakhtunkhwa Vide No.3046 dated 16/07/2019 stated that the said teacher was never employed and there is no record available regarding her service at DEO (F) Battagram. 

  Annexure---16
- In the meanwhile, Mst. Nighat Seema (Ex-AT) on rejection of her Departmental Appeal by the competent authority submitted service appeal No.1380/2019 Vide Diary No.1617 dated 08/11/2018 before the KP Service Tribunal Peshawar for her re-instatement.
- ❖ The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a fresh regular inquiry.

#### **FINDINGS:-**

- 1. Arabic Teacher (AT) is a District cadre post and a domicile holder of one district is not eligible to apply for the said post in another district in normal circumstances as per rules.
- 2. Mst Nighat Seema has no service record at District Battagaram as per DEO (F) Battagaram report. (Already attached as Annexure 14)
- 3. Mst. Nighat Seema has no salary record at District Battagram.
- 4. DEO (F) Charsadda has also declared the appointment of Mst. Nighat Seema as fake and bogus.

the



5. Mr. Adnan B/O Mst Nighat Seema confessed in Court that his sister's appointment letter was fake and bogus. He further stated that Ameen named clerk who was serving at that time in GHS No 1 Peshawar had taken Rs 5,80,000/-from his father and handed over a fake and bogus order.

Annexure---17

## MST-ZIAYGUL EX-DM CHARSADDA

## BACK GROUND & ORIGIN OF THE ISSUE:

- ❖ Mst. Zia Gul of District Charsadda was appointed as DM (BS-09) on allegedly a fake and bogus appointment letter in District Battagram vide Endst No 3505-09 dated 14/03/2006 and was posted at GGMS Thakot Battagram on her appointment.
  Annexure---18
- ★ Her posting is also mentioned at GGMS Mohandri (District Mansehra) w.e.f 01/10/2009 as per copy of her service book at page No.50.
  Annexure---19
- \* There is no record available of her transfer from GGMS Thakot Battagram to GGMS Mohandri (Mansehra).
- ❖ She was transferred to GGMS Dheri Hamid Mian Charsadda from GGMS Shalian District Mansehra vide office of the Director E&SE KP Peshawar Endst No.3655-50 dated 27/01/2011.
  Annexure---20
- ❖ It is noteworthy to mention here that there is no record of Mst. Zia Gul either transferred to or served at GGMS Shalian Mansehra.
- An inquiry was conducted through Mr. Jehangir (Principal) Government Shaheed Osama Zafar GMHSS No.2 Peshawar City and Mr. Khizer Hayat Senior Subject Specialist GGHSS No.4 Peshawar city in compliance to Director E&SE KP Notification bearing Enst No.4184-86 dated 25/09/2017.
- The said inquiry committee in its findings concluded that the appointment order of Zia Gul as DM at GGMS Thakot District Battagram is fake and bogus as per record of DEO (F) Battagram.

  Annexure---21
- ❖ In response to DEO (F) Charsadda letter No.8956 dated 8/12/2016 regarding service verification in R/O Mst. Zia Gul (Ex-DM), the DEO (F) Battagram declared her appointment as fake and bogus vide letter No.312 dated 18/01/2017.

  Annexure---22
- The Peshawar High Court in its decision on 14/09/2017 in W.P.No 2028-P/2017 referred the case to Director Anticorruption KP with the direction to probe into the matter within a fortnight positively and submit the report.

  Annexure---23
- ❖ The Anticorruption Department Charsadda lodged an FIR against Mst .Zia Gul on 21/09/2019 without submitting an inquiry report to Court or any other office.
- ❖ In the meanwhile, the DEO (F) Charsadda dispensed with the services of Mst. Zia Gul (Ex-DM) for being fake and bogus vide DEO (F) Charsadda order No.10643 dated 22/11/2017. (Already attached as Annexure-10)
- ❖ The Said teacher submitted a Department Appeal for her re-instatement into service to Director E&SE KP on 20/12/2017.
- On rejection of her appeal by the Appellate Authority, she filed a service appeal in the KP Service Tribunal Peshawar.
- The KP Service Tribunal gave its judgment in the said case on 11.11.2021, setting aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and also ordered to conduct a regular inquiry into the matter.

#### **FINDINGS:-**

- 1. Drawing Master (DM) is a District cadre post and Mst. Zia Gul (Domicile holder of District Charsdda) was not eligible to apply for DM post at a far flung District Battagram.
- 2. No record of Mst.Zia Gul's appointment and transfer is available at DEO (F) Battagram.
- 3. The said teacher was provided a fair opportunity to defend herself by inquiry committee led by Mr. Jehangir (Principal) GHSS No.2 Peshawar city.
- 4. Mst Zia Gul did not appear for self-defence and personal hearing to the present inquiry committee on 12/04/2022.
- 5. All the relevant record and the earlier inquiry report clearly suggest that the appointment letter of Mst. Zia Gul (Ex-DM) was fake and bogus.

## CONSOLIDATED MAIN FACTS & FINDINGS OF ALL FOUR CASES:

After scrutinizing the statement, Inquiries and available record at the o/o the DEO (F) Charsadda, the following major findings were brought about as a result:

Total Contract of the Contract

1. All the four posts in the concerned cases i.e CT.PST, AT and DM are District cadre posts and no candidate from out district is eligible to apply for the posts.

The Four Ex-teachers i.e. Mst. Nazma Ali (Ex-CT), Shama Begum (Ex-PST), Nighat Seema (Ex-AT) and Mst. Zia Gul (Ex-DM) are the residents of District Charsadda and they were not even eligible for the district cadre posts in out districts.

3. The Four Ex-teachers i.e Mst. Nazma Ali (Ex-CT), Shama Begum (Ex-PST), Nighat Seema (Ex-AT) and Mst. Zia Gul (Ex-DM) deliberately abstained from appearing before the inquiry committee for personal hearing and self-defence on 12/4/2022.

4. As per the earlier inquiry reports, Peshawar High Court decision, thorough scrutiny of available evidences and record, The DEO (F) Charsadda order No.10603 dated 22/11/2017 regarding termination of Shama Begum Ex-PST, Nighat Seema Ex-AT and Zia Gul Ex- DM is legal and justified.

5. That Nazma Ali Ex-CT Dismissal from Service on the charge of fake appointment vide DEO (F) Charsadda No 1508-15 dated 19/07/2019 upon the recommendation of the inquiry report of Miss Naheed Anjum Deputy Directress E&SE Khyber Pakhtunkhwa Peshawar constituted vide No . 9749-51 dated 26/10/2018 is also legal and justified.

6. No action had been taken against the officers/officails responsible for it as per FIR of Annexure ---24 COACECHD dated 09/10/2017.

The report is submitted for further necessary action please.

Principal Mosa zai Peshawar **Deputy District Education Officer** 

(Male) Mohmand





#### OFFICE OF THE DIRECTRESS ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

#### NOTIFICATION.

The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar is pleased to constitute the following committee to probe as per DEO Female Charsadda letter No. 8158 dated 3.3.2022.

Mr. Shabeer Ahmad Principal (B-19) GHSS Mosazai Peshawar

Chairperson

2. Mr. Liaqat Ali DDEO Mohmand

Member

The inquiry committee will submit report to this office within ten (10) days positively.

Director

Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Copy forwarded to the:-

Mr. Shabeer Ahmad Principal (B-19) GHSS Mosazai Peshawar (Registered).

2. Mr. Liagat Ali Dy: District Education Officer Mohmand (Registered).

3. District Education Officer (F) Charsadda with the remarks to assist and provide the relevant record to the Inquiry Officer concerned. A 2 2 15/3/2022

4. PA to Director E&SE Peshawar.

Assistant Director (Female)

Elementary & Secondary Education

Khyber Kakhyunkhwa, Peshawar



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA.

NO. SISY /DATED/ 633 / 633 /2022

#### Immediate Court Matter Case.

Tc

The Director,

E&SE Govt of Khyber Pakhtunkhwa

Peshawar.

SUBJECT:-

Service Appeal the 1580/2039 tilled on Mar lee han all Service Appeal

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Memo

Reference to your letter no 12114 dated 31/12/2021 on the subject noted above as per your directions this office has filed the CPLA against the subject judgments! As the CPLA has already been filed, your good office is requested by the undersign through letters no 6764-66 dated21/01/2022 and 7876 dated 21/02/2022. It is once again requested to nominate an inquiry officer at your own level in order to avoid legal complication.

Your good office early response will be highly appreciated please.

ON OFFICER

. DISTRICT EDUCATION OFFICER

(FEMALE) CHARSDDA

Endstt No.\_\_\_\_

Copy to the:.

1. Section officer litigation(II) E&SE department Khyber Pakhtunkhwa Peshawar.

2. Deputy Director (legal) E&SE department Khyber Pakhtunkhwa Peshawar.

3. Office file.

DISTRICT EDUCATION OFFICER (FEMALE) CHARSDDADA

[4-1]



# Annexus (03)

## OFFICE OF THE PRINCIPAL GHSS MUSAZAI PESHAWAR

No 706 /Inquiry Charsadda (F)

Dated: 08 -4

To

The District Education Officer (Female) Charsadda

SUBJECT: INQUIRY REGARDING SERVICE APPEAL NO 1639/2019 TITLED MST NAZMA ALI, SERVICE APPEAL NO 1390/2018 TITLED MST SHAMA BEGUM, SERVICE APPEAL NO 1380/2019 TITLEDNIGHAT SEEMA AND SERVICE APPEAL NO 550/2018 TITLED ZIA BEGUM

Memo

The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar was pleased to constitute the following committee vide his office Notification No 469-72 dated, 16/3/2022 to probe as per report of the DEO(F) Charsadda letter No 8158 dated 3/3/2022 regarding Service Appeal No1639/2019 titled Mst Nazma Ali, Service Appeal No 1390/2018 titled Mst Shama Begum, Service Appeal No 1380/2019 titled Nighat Seema and Service Appeal No 550/2018 titled Zia Begum.

Mr. Shabeer Amad Principal (BS-19)

Chairman Member

• Mr. Liaqat Ali (Bs-18) DDEO(M) Mohmand

You are hereby requested to make ready the record alongwith your written statement reflecting the whole history in speaking forder and also direct/inform the said four Ex-teachers to appear before the committee in person on 12.4.2022 at your office positively.

Shabeer Ahmad

PRINCIPAL GHSS Musazai Peshawar

PRINCIPAL ZE

on hands the state of the state





TO

- 1. MST Nazma Ali Ex.CT GGMS Rajjar.
- 2. Mst Shama Ex PST GGPS Pigham Chd.
- 3. Mst Nighat Seema Ex AT GGHS Dadu kili.
- 4. Mst Zia BEGUM Ex DM GGMS Dheri Hameed Mian.

Subject.

INQUIRY REGARDING SERVICE APPEAL NO 1639/2019 TITLED MST MST NAMA ALI SERVICE APPEAL NO 1390/2018 TITLED TITLED MST SHAMA BEGUM SERVICE APPEAL NO 1380/2019 TITLED NIGHAT SEEMA AND SERVICE APPEAL NO 550/2018 TITLED ZIA BEGUM.

MEMO:

Reference letter received from the Inquiry Officer vide NO 706/Inquiry Charsadda(f) dated. 08.04.2022 regarding above cited subject.

You all are directed to attend the office of the undersigned in person on 12.4.2022 at 9.30 AM along with your complete service record positively.

Encl (Photo copy attached)

DISTRICT EDUCATION OFFICER
(FEMALE)CHARSADDA.

Copy forwarded to the

Principal GHSS Musazai Peshawar for information please.

2 ADEO(litigation )local office.

3 Office file.

DISTRICT EDUCATION OFFICE

(FEMALE)CHARSADDA

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# ATTENDANCE SHEET

INQUIRY: - VIDE DIRECTORATE OF E&SE KHYBER PAKHTUNKHWA NO.469-72 DATED 16/3/2022

VENUE: - DISTRICT EDUCATION OFFICER (F) CHARSADDA

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SIGNATURE	5111M	Posent	Absent	Hosent	Absent.			
CONTACT NO	D. S. C. (1) C. Will 0.3333536 h (2)							
DESIGNATION		Ex- 1:57	Ex-AT	Ex- In	Ex- CT	& ACEC(+1F)	•	
NAME OF OFFICER/OFFICIAL	Sura Pegum	in orma Begrum	Neghot seema	Lia Gul	NazmacAli	Shagntta Ram		
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#### STATEMENT OF DEO (FEMALE) CHARSADDA.

#### MST: SURAYYA BEGUM EX- DEO (F) BANNU / PRESENT DEO (F) CHARSADDA.

In pursuance of the letter of the inquiry committee vide his office No. 706 dated 8/4/2022, a letter was issued to the Ex- teachers named, Nazma Ali , Shama begum, Nighat Seema and Zia Gul vide DEO (F) Charsadda No. 9383-87 dated 08/04/2022 with the direction to appear before the inquiry committee in person in the office of the DEO (F) Charsadda on 12/04/2022 along with record. Moreover, the said Ex- Teachers were also informed telephonically to attend this office on 13/04/2022. They attended the office of the DEO (F) Charsadda one day before the arrival of the inquiry committee i-e 11/04/2022. They refused to receive the hard copies of the said letter of this office.

DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA



# ice of the District Education Ufficer Jemaie District Charsadda

Whereat Mst Nazma Ali CT (BPS-15) GGHS Rajjar r/o Kajjar Charsadda, was proceeded under Khyber Pakhtun khwa Govt. servants (Efficiency and Discipline) Rules 2011, on the charges of Take Appointment.)

2 And whereas the undersigned directed to the accused teachers through notice

time and again and found her as a fake appointee.

And whereas the Worthy director E&SE Deptt Khyber Pakhtun khwa Peshawar initiated/conducted enquiry Vide No, 6754 F, No. 14 (F)/Appeal Charsadda, dated 24-05-2019 against Mst Nazma Ali (CT) through Mst Naheed Anjum Deputy Director Female E&SE Khyber Pukhtoon khwa, Hence the Appointment order of Mst Nazma Ali declared take by the enquiry-officer with the direction to the DEO (F) Charsadda may register an FIR in the Anti Curruption against the said fake teacher and all amount taken as salary may be recovered and refund to Government exchequer,

And Whereas, the show cause notices vide NO 16615 dated 30/5/2018, No.16665 dated,2/6/2018, No16736 dated 6/6/208 and personal hearing 20825 dated 13/11/2018 and E-mail verification by DEO(F) Battagram dated 23-5-2019 was served

upon to Mst Nazma Ali Through DEO (F) Charsadda.

4. And Whereas, the authority having considering the charges, evidence on the record as per enquiry report, hence keeping in view the charges leveled against her have been proved hence she is not remained a civil servant under the rules on account of fake appointment lettet.

Therefore, in exercise of the powers conferred by the Khyber pakhtun khwa Govt. servants, (Efficiency and Discipline) rules 2011, the competent authority is pleased to impose the Major penalty of Dismissal from service upon Mst Nazma Ali CT GGHS Rajjar Distt Charsadda with immediate effect

The ODEO (F) Charsadda already stopped her salary due to having fake appointment letter.

(Ulfat Begum)

District Education officer (Female)

Charsadda

--) dated (-

Copy forwarded for information and n/action/to the;

1. PA to the Director E & S Education Khyber Pakhton khwa Peshawar.

PA to the Deputy Commissioner Charsadda.

3. District Monitoring Officer E & SE Charsadda.

4. District Accounts Öfficers Charsadda.

The Concerned DDEO Female Charsadda with the request to recovered the salaries and deposit in Govt. Treasury through Challan under intimation to this office.

I-lead teacher GGHS rajjar Charsadda

Mst Nazma Ali Ex CT Charsadda...

8. ADO Estab Primary Local Office.

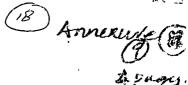
The Anti-Corruption Department Charsadda may be request to register FIR against the said take teacher for Compliance the Enquiry recommendation.

10. Master File.

District lidulation officer (Female)

Bayer and and office

INQUIRY,



Detector E&SE Khyber Pakhtunkhwa Peshawar was pleased to nominate the undersigned as Endst No.9749-51/F.NO14/(F) Appeal Charsadda Party: Fesh the 26/10/2018(Annexure-I). HOW KGROUND

DEO (F) Charsadda requested the worthy Director Elementary & Secondary Education Pakhtunkhwa vide Letter No.19585 Dated 5/10/2018 to order an inquiry regarding the of Mst. Nazma Ali CT from Battagram to Charsadda (Annexure-II).

After intimating vide Letter No. 2048 Dated:09/11/18(Annexure-III), the undersigned visited the Office of the District Education Female, Charsadda on 14/11/2018. She perused and collected all the relevant available record. During the visit of DEO(F) office, Mst; Nazma was also present (Annexure-IV). She submitted her written statement on the

Letter No. 195 Dated 1/11/18 and Letter No. 2048 Dated 9/11/18(Annexure-V &VI) were sent to the District Education Officer (F) Battagram requesting him to direct the dealing hands to attend the office of the undersigned along with all relevant record. He attended the office however, he provided incomplete record. The DEO(F) Battagram was again requested vide Letter No. 8609 dated 31/1/2019(Annexure-VII) and was telephonically contacted as well but the requisite information was not provided.

The Deputy Director (F)Establishment Directorate of E&SE was requested vide Letter No. 193 Dated 01/11/2018 (Annexure-VIII) to verify the transfer order of Mst. Nazma from Battagram to Charsadda. In response, vide Letter No 603/F.No.14/Appeal Charsadda Dated Peshawar the 21/12/2018(Annexure-IX) it was replied that the file had been misplaced during shifting of office and the dispatch/issue register was in the custody of NAB and they did not possess any record pertaining to the transfer in question.

The existing dealing assistant of Deputy Director (F) Establishment Directorate of E&SE Mr. Muhammad Zahir was asked vide Leiter No. 380 Dated 1/1/2019(Annexure-X) to record statement regarding misplacement of the required file. In reply, he said that the dealing assistant in 2013, was Mr. Munir and that he would be in a better position to response (Annexure-XI). Therefore, Mr. Munir Khan, the then dealing assistant was asked vide No 794 Dated 3/1/19(Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education. (Annexure-XIII). So, in those conditions the

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mental and the animal and

inquiry officer was unable to retrieve any official record or documents despite issuing afficial letters.

to District Education Officer Male Swat was sent vide No. 5265 Dated 1/2018(Annexure-XIV) to direct Mr. Khadim Shah the then Suptt Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as the had personally visited the DEO Office Battagram to verify the documents of Mst. Szma. Statement of Mr. Khadim Shah was recorded (Annexure-XV).

Studied the case thoroughly.

Reported findings accordingly.

#### marchalls:

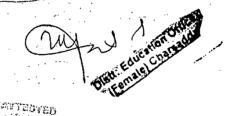
24.

#### SUMMARY OF THE STATEMENT OF MST NAZMA

realizabled verbal discussion in the office of District Education Officer, Mst Nazma Ali gave ratement in the presence of DEO (F). She stated that she was appointed in GOHS No5509-14/FB/AE-II/Appointment/2010 Endst District Battagram vide Mariant. 1/2011(Annexure-XVI) as a CT without any written test. As CT post was not lying GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office order ent No 1385-89 Dated 31/1/2011 (Annexure-XVII). Her husband was posted in office Battagram as a class IV. He belonged to District Charsadda. After four months for medical leave but she could not provide any record of her medical leave to the According to her statement she was transferred to Charsadda vide endorsement No. A-167CT2013 Dated Peshawar the 1/3/2013. She provided charge report in GGMS relieving certificate from GGHS Banian, Application for transfer, transfer order, register of GGMS Shamlai, pay slip along with her written statement (Annexure c.d,e,f,g). Surprisingly pay slip which she provided name of the school is GHS Trans. III

#### SUMMARY OF THE STATEMENT OF MR. MUHAMMAD JAMIL SUPERINTENDENT BATTAGRAM:

Jamil superintendent office of the DEO (F) Battagram visited the office of the twice on 28/11/2018 and 6/12/2018. He provided incomplete record and only appointment order of 2011 (Annexure-XIX). Photocopy of statements of DEO (F) Battagram attendance register of GGMS Shamlae (Annexure-XX, a, b, c the statement that the name of MST Nazma could neither be found in the statement of GGHS Shamlae saying that, as per the attendance register no teacher on the statement in the statement in the statement of the statement of GGHS Shamlae saying that, as per the attendance register no teacher on the statement of the statement in the statement in the statement of that the name of MST Nazma and in any school of Battagram. He provided minutes of DSC meeting in which



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f total 12 vacant posts,9 posts were recommended/approved to be filled from batch wise list (a) and 3 from open merit, at the ratio of 75% and 25% as per policy that time in vogue. wever, 10 candidates were appointed in batch wise quota and 3 from open merit, total 13 wintments were made instead of 12. In the appointment order provided by Mst. Nazma Ali 11 didates were enlisted. Alarmingly, the appointment file was incomplete and a transfer file of t period was missing in the office of the DEO Battagram. (Annexure XXII a, b)

## THE STATEMENT OF SUPERINTENDENT CHARSADDA:

Khadim Shah recorded his statement and clarified that he visited office of the DEO (F) gram to verify the service documents of Mst. Nazma by hand on 14/4/2013 and checked all a record their but due to absence of DEO (F)Battagram on that day he left the record for matures/verification. Later on, the verification was sent to DEO (F) Charsadda vide letter no \$74/verification Dated 17/4/2013 through post/ Mail. (Annexure-XXIII). He also provided fendance certificate signed by the then DDEO Battagram, Mr. Fida Muhammad (Annexure-TIV). It is astonishing that all the record was also signed by the same DDEO but not provided and and sent that through post. RIGIN OF THE ISSUE:

bring visit of DEO (F) Office Charsadda, the DEO female told that she requested for the active after the anticorruption Charsadda sent a letter to her office on 25/9/17, regarding detail the teachers who were transferred from other districts and FATA from 2006 onward. Expexure-XXV) Hence, a letter for the verification of service documents was again sent vide ther no 7972/Dated 21/10/2017to DEO (F) Battagram. (Annexure-XXVI). Reminder for Fification was sent vide endorsement no 18919 dated 3/2/2018. (Annexure-XXVII). The scuments were received duly verified, vide letter no 5390 Dated Battagram the 9/3/2018 ring signatures like the then DEO (F) Battagram MST Rehana Yasmin. (Annexure-XXVIII). DEO Charsadda was worried about fake appointments so, she sent the documents to the EO (F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) tragram in which she told that not only the verification letter was fake but also the dispatch abber on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted E. District accounts office Battagram verified her LPC vide letter no 174 DAO/BM Dated Madings

From the available record of both the DEO (F) Offices, statement of all the The appointment order is fake and bogus.

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- Teacher attendance register of GGMS Shamlac revealed that she had never been a part of that school.
- The salary record was not traceable from Battagram.
- Transfer order issued by the directorate was also not confirmed as the file was missing in
- The academic documents provided were also not verified by the institutions concerned.
- Verification of all document also proved to be fake.
- The ministerial staff in the female DEO office are responsible for the loss or nonproduction of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

#### **ECOMMENDATIONS**

- The fake appointment order produced by Mst. Nazma may be treated as of no effect and be treated as null and void ab initio. The DEO (F) Charsadda may register a FIR in the Anti-Corruption against the said teacher.
- All amount taken as salary may be recovered and refund to government exchequer.
- An in-depth inquiry may be initiated against the Ministerial staff of DEO office Battagram and establishment branch in Directorate for their casual handling of the office record and squandering valuable official record pertaining to the appointment /transfer and they should then be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
- 4. DEO female office Battagram may be directed to bring her house in order, recover the official record of her office and secure them from loss.

The report is submitted for perusal and further necessary action under the rules, please.

Miss Naheed Anjum

Deputy Director

E&SE Khyber Pakhtunkhwa



OFFICE OF THE

DISTRICT EDUCATION OFFICER (FEMAL)

CHARSADDA

In the light of inquiries report & court judgments, the appointments of the following teachers are illegal, void ab-initio and against the prescribed rules, therefore the services of the following teachers are here by dispensed hence they are no more remained teachers.

S.NO	NAME OF TEACHERS	DESIGNATION	NAMES	REMARKS
	Zia Gui	DМ	GGMS Hamced mian dheri Charsadda	Through court Judgment w/p no 2028/2017, enquiry report.
02)	Nighat seema	AT	GGHS Dado killi charsadda	Through verification vide lette No 312 dated 18-01-2017
03	Hasrat PET	PET	GGHS turlandi 'charsadda	DO
04.	Sania wati	SST	GGHS Daulat pura	Vide letter No, 7603 dated 13-10 2017 send by the DEO (F) to
05	1	PST	GGPS pegham	director, response vide letter No 2630 dated 13-10-2017
	Shama beguni		koroona konsanda	Through judgment w/p no 4738 p/2016 & enquiry report

DISTRICT EDUCATION OFFICER FEMALE CHARSADDA

Endst N dated Copy for information

(1) Registrar Judicial Peshawar high court.

(2) Director E&SE kpk peshawar.

(3) Official concerned.

DISTRICT EDUCATION OFFICER FEMALE CHARSADDA

Advocate on-Mecord Supreme Court of Pokistary

S. por



Annexure - 30

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#### NATURE OF THE INQUIRY:-

poursuance of the letter of the District Education Officer (Female) Charsadda bearing Endst. 64798 dated 22/06/2017 the Director Elementary & Secondary Education Khyber 9khtunkhwa Peshawar in his capacity as the appellate authority vide Notification No.2702-03/No.56/(F)/Appeal Charsadda dated 28-07-2017 ordered an Inquiry in respect of Mst. Shama agum PST GGPS Plagham Charsadda to probe the matter with the following TORs.

#### FRMS OF REFERENCES OF THE INQUIRY:

- 1. To inquire the 1st appointment order of the incumbent.
- 2. To verify pay sllp/LPC/salarles drawn from FATA/AEO concerned.
- To verify transfer order of the said teacher, made from FATA to district Batagram and then to district Charsadda along with No Objection Certificate from FATA to district Batagram and from district Batagram to district Charsadda.
- 4. To verify pay slip/LPC/salaries drawn from DAO Batagram and district Charsadda.
- 5. To check thoroughly the Attendance Register of the relevant school of the teacher concerned.

#### HISTORY OF THE INQUIRY:

The salary of Mst. Shama Begum PST GGPS Piagham Charsadda had been stopped by the then SDEO (F) Charsadda, Miss Nadia, for the reason that her appointment order and other relevant documents regarding her services were fake as she failed to provide the documents required to SDEO (F) Charsadda asked vide Endst. No. 219 dated 26/08/2014. (Copy of letter is annexed as A).

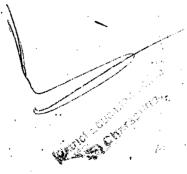
Mst. Shama Begum PST GGPS-Piagham Charsadda instead of providing the requisite documents to the SDEO concerned, knocked at the doors of the Hon'ble Peshawar High Court Peshawar against the decision of the SDEO (F) Charsadda of her stoppage of pay.

#### MECHANISIM OF THE INQUIRY:

The following procedure was adopted to conduct the inquiry:

- 1. Both the offices of the Director Education FATA Khyber Agency Warsak road Peshawar and the AEO Khyber Agency Jamrud were visited on 11/08/2017 who had already been intimated by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Notification No.2702-03/ F.No.56/(F)/Appeal Charsadda dated 28-07-2017.
- 2. The Inquiry committee was provided with a written detailed statement regarding the the TORs, by the AEO Khyber Agency Jamrud bearing Memo No.546 dated 11-08-2017.

  (Copy annexed as B)
- 3. Likewise, the Inquiry committee, for the purpose to verify the LPC issued and duly signed by the then AEO Khyber Agency Mr. Hashim Khan Afridi, now Director Education FATA Secretariat Peshawar, visited the office of the Director Education FATA Secretariat Peshawar on 16/08/2017.
- 4. The Inquiry committee was provided with a written statement from the then AEO Khyber Agency now the Director Education FATA Secretariat Peshawar vide Memo No. Nil dated 16-08-2017. (Copy annexed as C)
- 5. The Inquiry committee, for the purpose to verify the transfer order bearing Endsti-12085-97/F. No. 103/PTC (F) FATA to Sett: dated 13/04/2011 and subsequent. transfer order Endst: No. 3464-69 /F. No. 51/Gen. Transfer (F) dated 07/09/2011, issued by the Director Elementary & Secondary Education NWFP/ Khyber Pukhtunkhwa,



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Peshawar visited the office of the Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar on 22/08/2017 and made a request for the purpose vide letter No. 1912/F. No. Inquiry Dated: 22/08/2017. (Copy annexed as D)

 The Inquiry committee was provided with a detailed written statement by the Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar, bearing Memo No.4588/F.No. 56(F)/Appeal Charsadda dated 21-08-2017. (Copy annexed as E)

## FINDINGS AND CONCLUSION OF THE INQUIRY:

After thorough examination of the available record, detailed written statements of the AEO Khyber, DE FATA, Director Elementary and secondary education KP the inquiry committee furnishes its findings and conclusions as follows.

- 1. The AEO Khyber Agency Jamrud in his written statement when asked about verification of service documents of Mst. Shama Begum PST GGPS Aka Khel Bara Khyber Agency now PST in GGPS Piagham Charsadda furnished to the inquiry committee has declared that:
  - (i) The name of the school i.e. GGPS Aka Khel Bara Khyber Agency, where the teacher concerned has been shown as adjusted on her initial recruitment, does neither exist on the grounds of Khyber agency nor in the papers of the record of Khyber Agency education department i.e. in the SNE of AEO office Khyber Agency.
  - (ii) The bogus signature ridiculously appended to the appointment order of Mst.

    Shama Begum PST has been resembling to the signature of Ex. AEO KhyberAgency Mr. Dilbar Khan but his period of services has been w.e.f 21/03/2004
    to 16/08/2005, as is evident from the AEO display board in the office of AEO.
  - (iii) Mr. Jahngi Khan remained the AEO of Khyber Agency for the period w.e.f 01/04/2003 to 05/08/2003.
  - (iv) The bogus signature appended to the LPC of Mst. Shama Begum PST has been resembling to the signature of Ex. AEO Khyber Agency Mr. Hashim Khan. Afridi which did not match with his specimen signature.
  - (v) No record was available regarding appointment/services/salaries of the teacher concerned in the office of the AEO Khyber Agency.
  - 2. The Director Education FATA Secretariat Peshawar in his written statement has disowned the signature appended to the LPC of the teacher concerned.
  - 3. The Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar in his written statement has disowned the Endst: No(S) and signatures appended to the transfer orders in respect of Mst. Shama Begum PST bearing Endst: 12085-97/F. No. 103/PTC (F) FATA to Settle: dated 13/04/2011and Endst: No. 3464-69/F. No. 51/Gen. Transfer (F) dated 07/09/2011 and further declared that no record was found regarding her transfer either from FATA to district Batagram or from district Batagram to district Charsadda.
  - 4. During the course of the inquiry proceedings this inquiry committee came across many other anomalies such as:-
    - (i) The LPC No. 975 dated 31/05/2011 prepared for the month of May 2011 depicts her basic pay Rs. 3820/- per month which is the minimum/initial of BPS-09 in May 2011.
    - (ii) And the LPC No. 129 dated 31/08/2011 prepared for the month of August 2011 depicts her basic pay Rs. 6200/- per month which is the minimum/initial of BPS-09 in July 2011.
    - (iii) Whereas the page No. 06 of her service book shows her basic pay Rs. 5200/- in May 2011 and then Rs. 8480/- in August 2011 which is the 6<sup>th</sup> stage, which she might deserve only after the passage of six long years.

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- Looking for her own interest to validate her fake services, the teacher concerned, driving the nail aright, ultimately succeeded in her fraudulent plan, when in pursuance of the Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar Endst: No. 3464-69/F. No. 51/Gen. Transfer (F) dated 07/09/2011 she was transferred from district Batagram to GGPS Paigham district Charsadda where her pay has been started and she has claimed and drawn her all undue and illegal arrears w.e.f 01/09/2011 to 31/05/2011 on the basis of fake documents as evident from the page No. 07 of her service book and pay roll for the month of June 2011.
- 6. She has been paid normally up to 30/06/2014 till her pay has been stopped by the then SDEO (F) Charsadda for the doubt of fakeness of her basic service documents.
- 7. The worthwhile step of stoppage of monthly salarles of Mst. Shama Begum PST by SDEO Charsadda is worth commendable and appreciable. Had the DEO (F) Charsadda lodged an FIR against the bogus teacher in the police station concerned after conducting an inquiry in the instant case, for the reason that Mst. Shama Begum PST is not a civil servant to be proceeded under any rules of law meant for disciplinary proceedings against a civil servant?
- 8. The basic documents which determine the entire services as fair/fake of a teacher are his/her first appointment order, medical report, LPCs, entries in the service book, transfer orders and other similar record and in the case of the teacher concerned it has been proved beyond any doubt that all these documents were found fake and bogus. She has been inducted in the educational system with the connivance of the active MAFIA.
- The committee is of the opinion that further investigation in the instant case is needed in term of reference to fix the responsibility upon her facilitators who were the essential part of this fraudulent plan other than the teacher concerned which may need a detailed inquiry.

#### RECOMMENDATIONS OF THE INQUIRY:

In view of the above submissions it is recommended that:

- 1. Her pay may not be released in any circumstances thereto.
- 2. All the salaries drawn by her may immediately be recovered from her.
- 3. An FIR may be lodged against her in the police station concerned.
- 4. A detailed inquiry is recommended for the purpose to point out and take the MAFIA persons to task who facilitated her.

(SAFDAR KHAN)

PRINCIPAL BPS-18 GOVT: SHAHEED SAADUR REHMAN HIGH SCHOOL (GULSHAN REHMAN COLONY) PESHAWAR

(Inquiry Officer)

(MUHAMMAD IQBAL)
PRINCIPAL BPS-19

GOVT: HIGH SCHOOL 'BADHBER PESHAWAR.

(Chairman Inquiry Committee

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Farid Utalia Kundi Advocate unificaded Supreme Council Physical

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER (EA SE) BATTAGRAM.

#### APPOINTMENT ORDER.

Consequent upon the approval of computant methodity that Mist Nighat Seems D/O Raz Muhammad is heroby appointed as A.T in Govt. Girls Middle School, Gidri Khair Abad Battagram in BPS 09 against vaccat post plus tunnt allowances as admissible under the rule in the interest of public service with effect from the date of her taking over charge.

#### FERRES & CONDENTIONS.

- She will be governed by such rules & regulation as may be prescribed by the Govu from time to time for category of the Govr, Servant to which he belong.
- in case of resignation prior potice of one month should be given by the official concerned other wise one month pay /afferrances will be forfeited in lieu thereof Her original Certificate/degrees should be checked and verified from the concerned BISE/University concerned etc before handing taking over charge by the DDO concerned through Agency Education Officer concerned
- 3. She declaration of assets should be obtained and kept in sufe custody by the DDO concerned
- ٩. She take over charge of her post with in one month after the issue of this appointment cuttler
- Charge reports should be sent to all concerned.

6. NO TAINA etc is allowed

> EXECUTIVE DISTRICT OFFICER FIR & SECY EDII BATTACKAM

Endst No 3814 70/AB/Fath (F).

Dated 01-0 912000.

- Copy forwarded for information & occurring action to the
- P.S to DCO Battagram...
- 2;-District Accounts Officer concerned
- 3-Distr.Officer Female Concerned.
- Candidate conces

Personal file

DISTRICT OFFICER (FEMALE) ELE & SECVEDU BATTAGRAM

CRETRICT OF ELEMENTARYAS SECTIONARY ELEMENTARYAS SECTIONARY

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Foriste in Kena) Advocations Record

Supreme Court of Pakistan

District Education Officer (F) Thomas of

FELEMENTARY & SECONDARYEDUCATION KHYBER PAKHTUNKHWA, PESHAWAR. Consequent upon ban relaxation by the competent authority, Mst. Nighat

OFFICE ORDER.

Seema (AT) GGMS Gidri Khairabad District Battagram is hereby transferred/adjusted against the vacant post of (AT) at GGMS Amir Abad Dakki District Charsadda on her own pay & BPS in the interest of public service with effect from the date of her taking over charge.

Noig: -

- Charge report should be submitted to all concerned.
- 2. No TA/DA etc are allowed.
- 3. The EDO concerned is directed to check her original service documents: before making payment of salary.
- Her Seniority will be determined as per rules/policy.

DIRECTOR ELEMENTARY & SECY; EDUCATION KHYBER PAKHTUNKHWA

/F.No.167/ Vol-5 Transfer(F) K.P. Duted Pesh: the 16 / 1/ /2012

Copy of the above is to the:-

- 1. Executive Distaict Officer (E&SE) Battagram & Charsadda.
- District Accounts Officers Battagram & Charsadda.
- Teacher concerned.
- 4. Headmistress concerned:
- 5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.

Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

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## OFFICE ORDER

Mstt: Nighat Seema AT GGMS Gidri Khair Abad District Battagram under transferred to GGMS Amir Ahad Dhakki is hereby posted at GGHS Dado Killi against the vacant post AT on her own we grade in the interest of public service with immediate effect.

Note:-

No TA/DA is allowed

Charge report should be submitted to all concerned.

(ATTA ULLAH KHAN) EXECUTIVE DISTRICT OFFICER E&SE CHARSADDA

/Dated Charsadda the

Endsit No.\_\_\_\_

Copy for Information & Necessary action to the:

1. District Account Office Charsadda

2. Head Mistress Concerned

3. Accountant Local Office

ADO B&A/Supdtt: Local Office

5. Official Concerned
6. Office File

Office File

E&SE CHARSADE

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Supreme Coult of I-akistan

ALLISANDA

گزارش ہے کہ میری تعیناتی بطور (BPS-9) A.T گورنمنٹ گرلز ار لسکول، گدری، خیر آباد شلع بنگرام میں برویے آرڈ رنمبر (Titon.09.2009 مورجہ 01.09.2009 کو ہوئی \_ بعد میں میرا نتا دلہ برویے چھٹی نمبر 1766-71/E.No.167/Vol-5/Transfer(F)K.P ، مور خد 16/11/2012 گورنمنٹ گراز ہُدل سکول ، عامرآ باد ، ڈھکی جنلع جا رسدہ ، کیا گیا جس کے بعد مجھے گورنمنٹ گرلز ہائی سکول ، وا دو کلے ، شلع جا رسد ہ بروئے چھٹی نمبر 90-2486 ،مور نعہ 2012.201 کو تعینات کیا گیا۔ ابھی حال ہی میں مجھے ڈسٹر کٹ ایجو کیشن آفیسر (قیمیل)، جا رسدہ نے بروئے چھٹی نمبر 10643 ، مور خد 2017. 21. 22 كونوكرى سے برخاست كيا گيا جس ميں چھٹى نمبر 312 ، مور خد 18.01.2017 كاحوالدديا گياہے۔ مجھے سننے كاموقع ديا گياہے اور نہ ہى كوئى مناسب أنكوائرى موئى ہے۔ میری تعیناتی عین قانون کے مطابق ہوئی ہے اور بعد از ضروری قانونی لواز مات مجھے بطور A. T تعینات کیا گیا تھا۔میری کوالیفیکیشن ندکورہ پوسٹ کے عین مطابق ہے،میر نے علیمی اسناد کی با قاعدہ تصدیق کی گئی ہے اور دیگر دستاویزات کی تقید لتی بھی محکمة لیم نے کی ہے جو درست وضیح ثابت ہوئے ہیں، ندکورہ تمام کاغذات درخواست لذا کے ساتھ لف کئے جارہے ہیں۔

لہٰذا میری آپ حضور سے استد عاہے کہ تھم بر خاشگی المجھٹی نمبر 10643 ، مورجه 2017.1.1.2017 كومنسوخ فرماكر مجھے اپنے پوسٹ پر بحال كياجائے۔

تگهت سیما ولدرازمحمه سائن نور بهار کالونی نمبر 1، جارسده - (سائله)

مومائل نمبر: 9884189-0321

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#### OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM

(Phone # 0997-310460)

E-mail: demisfbattagram@yahoo.com

No. 3046 - /Primary /2019/

Dated: 16\_\_/07/2019

T

The Director 💯

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

Subject:

SUBMISSION OF REPORT IN RESPECT OF FAKE EMPLOYEES

Memo

Kirdly refer to the subject noted above it is stated that all the record in this office/school have been checked and no record found in respect of Mst. Zia GUI DM appeal No. 550/2018, Mst. Nighat Seema AT GGMS Khairabad Appeal No. 1380/2018 and Mst. Shama Begum PST GGPS Paimal Shareef, it is concluded that these teachers have never been employed in the strength of this office.

The report is hereby submitted for onward submission

District Education Officer (F

71 Battagram

#### Endstt No. As above

#### Copy for information to the:-

- 1- Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
- 2- Account-General Khyber Pakhtunkhwa, Peshawar.
- 3- District Accounts Officer Battagram with the same request.
- 4- Master file.

District Education Officer (F)

Battagram

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# BETTER COPY OF PAGE NO. IN THE COURT OF HAMID KAMAL, JUDICAL MAGISTRATE-IV, CHARSADDA

Inquiry No, 112 dated 21.09.2017 through writ petition No.2028-P/2007.

Statement of Adnan S/O Raz Muhammad R/O saeed Bagh Station Koroona, Charsadda, Tehsil & District charsadda u/s 164 Cr. P.C on oath.

Stated that Mst Nighat Seema female teacher (AT) is my sister. After passing her matric examination and she continued her study in Madrassa Ayisha Lilbanat which is registered with Wifaqul Madaras and obtained her Shuhadat-e-Anila degree which is equal to Master degree in Islamiat. After education, she and my father were search of government sevice, when my father met with one Ameen Clerk at Government High school No.01 Peshawar, who took 5,80,000/- from my father for getting employment for my sister in education department, who handed over employment order No. 3964-70 dated 01.09.2009 to my father for appointment at as AT at District Battagram and then transferred her to District charsadda Vide transfer order No.1766-7 dated 16.11.2012 and after that my sister was performing her duties as AT teacher in Government Middle School Dadu killy, which is now upgard High school. As all the above dealing was made in my presence, therefore. I know about the fact, in proof thereof I produce a photostate chit in which all the detail is mentioned and bears my father's signature. Now my father is dead and through this inquiry I came to know that the above said Ameen Clerk has committed fraud with us and handed over to us a bogus and fake appointment & transfer order. As other person/staff was also involed in the said fraud, therefore, I charge the clerk Ameen alongwith other staff members and prayed for justice

XX... Nil opportunity given.

RO & AC

03.10.2017

Adnan

NIC No 17101-5729337-5

(Hamid Kamal) Judicial Magistrate-IV Charsadda

CONTRECT SUBJECTOR

Parid U. M. Kuntdi Advessis to-Record Supreme Count of Hiddelph

District Education Officer (F.)

## OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) BATTAGRAM

Consequent Upon the Approval of the District Selection Committee. Battagram the following DM Female trained candidates are hereby appointed against the vacant post in BPS NO-09. Plus usual allowance admissible under the rules @ 25 % in the schools noted against each in the interest of public service with street and the rules @ 25 % in the schools noted against each in the interest of public service.

,	with eff	ect from the date of Name of	their taking over cha Father's Name	rge on the ter	ms & condition t	Place of Posting	Remarks
		Committed miles	Abdul Rashla	Khawari	Mansehra	GGMS Glari Kjhair Abad	Agairst V/Post
,	<u> </u>	(444 1144 114	Gul Pasand	Chaisadd	Charsadda	GGMS Thakot	Against V/Post
\ <u>'</u>	2	Zia Gui		<u>a</u>	Mansehra	GGMS Shingil	Against V/Post
	3	Bushra Anwar	Mohammad	Khawari	Manserna	Payeen	

Terms & Conditions.

Charge reposts should be submitted to all concerned.

They are entitled to get all benefits as admissible under the rules in civil servant Act except pension. They should however be entitled to receive such amount contributed by them toward the contributory provident fund along with contribution Made by the provisional government to their accounts in the said fund in the prescribed manner. Frovided further that in the event of death of civil servant whether before or after retirement their families should be entitled to receive the said amount if it has already not been received by the concerned.

Their services will be lightly to termination on one month notice from either side, in case of

Their services will be liable to termination on one month notice from either side. In case of resignation

without notice. Her orie month pay shall be terfelted to the Govt: The condidate are required to produced Age and Health certificate from the Medical. Supdi: DHQ

verification, will not be acceptable.

nospirol Battagram. (Only for fresh candidate). The condidates should join their posts within seven days of the issue of this order. Otherwise appointment order will cancelled.

The Appointment will get salaries against the sanctioned posts in the Budget. They will pold salaries after verification of their degree/certificates from the concerned universities/Boards/Institution on their own expenses by the DDO concerned. Personally/By hand

> (Mukhtar Ahmad Syvali ) **Executive District Officer** Schools & Literacy Battagram.

Endst: No.3505-07 Dated Battagram the 1415/06-/EB/AE-II/APPTT Copy forwarded for informallar, & necessary action to The:-

District Coordination Officer Battagram.

I/C Head Master of Govt: High/Middle Schools concerned.

I/C Head Master of sort, fight interest and posterior Accounts Officer Battagram.

A.D.O (B & A) Local Office with the remarks to not draw the solaries tell the completion of their document's verification.

I/C Pay Section ( Male ) Local Office.

Candidate Concerned..

Office file.

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District Officer (Fernale Schools & Literacy Baltacrom

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# OFFICE OF THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTOON KHAWA: PESHAWAR.

Consequent upon the approval of the competent authority, Mst Zia Gul DM at DEFICE ORDER GGMS, Shalian (Manshera) is hereby transferred to GGMS, Dher, Hamid Mian Charsadda, angulast vacant post of DM on her own pay and BPS in the interest of Public Service with effect from the date of his taking over charge.

Note;

Charge report should be sent to all concerned.

NO TAIDA etc is allowed

The EDO (E&SE) concerned is directed to check her original service documents before making payment of salary

Her Seniority list will be determined under the rule.

ELEMENTARY & SECONDARY EDU KHYBER FAKHTUN KHAWA PESHAWAR

(5-60/F.No.134/I/Dist Trst;

Dated Peshawar the 2

Copy forwarded for information to the;-

- Executive District Officer (E&SE) Manshera/Charsadda.
- District Accounts Officer Manshers / Charsadda.
- Headmistress Concerned:

Teacher Concerned.

P.A to Director (E&SE) Khyber Pakhtun Khawa Pesha

M/File.

Deputy Directress (Estab) (E&SE) Khyber Pakhtun Khawa Peshawar.

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Supréine Court de Pakistan

ANNEXURB

Vide Notification Ends:: No 4184-86 dated 25/09/2017 (F/A) Mr. Jehangir Principal Government Shaheled Osama Zafar CMHSS No.2 Peshawar City along with Mr. Khizar Hayat Senior Subject Specialist GHSS No 4 Peshawar, as Co-Opted member are authorized to conduct Enquiry against Mst; Zia Gui presently working as DN at GGMS Dehri Hameed Mlan Distr Charsadda regarding her ematter of fake documents,

Mst: Zia Gul Submitted her Service Book vide which she appointed as DM in BPS-09 at GGMS Thakot District Battagram against vacant Back ground appointed as DIVI III DESCUE OF QUIVIS HICKORDSHILL BALLARI AIT ABAILIST VALARIA DOST VIDE EDO(S&L): Battagram Endst No. 3505-00 dated 14-3-2006. Subsequently she has been allowed to BPS-14 on the basis of BA 2nd division W.e.f 15-03-2006 vide EDO(5&E) Battgaram Endst No 4819-22 dated 10-05-2006 Further she has been allowed BPS-15 on the basis of up gradation of PBS from 101-10-2007. Service verified. W.e.f. 15/03/2006 to 30/11/2007 from the acquaintance Roll and other record of the EDO(S&L) Battagram. Later on she has been transferred to GGMS Mohandri (Mansehra) on 01/10/2009. Heriservice varified w.e.f 01/12/2007 tq.30/11/2009 from the Acquaintance Roll & other record from the office of District Officer (Fernale) E8.5 Education Battagram. While her service also verified w.e.f. 01/10/2009 to 30/11/2009 from the Acquaintance Roll & other record from the District Officer (Fernale) School & Literacy Mansehra, in addition, we follow/2010 to 28/02/2011 (212 days) leave without pay was sanctioned vide EDO E&SE Mansenra under Endst No. 3965-66 dated 14/03/2011. At last she has been transferred to GGMS Dheri Hameed Mian Distt Charsadda Vide Endst No. 3655-60 F.No. 134/F/Distt Charsadda Dated 27/10/2011. Till date she is working as DM at the very school i.e Dheri Hameed Mian Disti Charsadda.

The undersigned along with Mr. Khizar Hayat senior Subject Specialist No.4 Peshawar as Co- opted member visited office of the District Education Proceedings: Officer (F) E&SE Battagram & Wansehra on 25-26/09/2017. The matter was discussed with DEO (Female) Battagram and concerned staff. Record pertaining to appointment orders of the period 2006 with regards to DIVI appointments was examined and discussed with the concerned staff Mr. Wasia Said the then District Officer (Semale) school and Literacy, Battagram was called upon by the

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Farid Lillah Kundi Advocate-en-Record ( Supreme Court of Pakistan

undersigned at the office of DEO (Female) Bartagram. He was presented original appointment order and Service Book of Mst. Zia Gul (F/B) .Mr. Wasiq Sald flatly denied his signatures on the appointment order, as well as entries made in the

Mr. Wasiq said the then District Officer (F) S&L District Battagram In his Written statement (F/C) termed that signatures made on the appointment order Service Book of Mst Zia Gul. as well as service book figures. He appended this specimen signatures in his

In addition nothing was found regarding appointment of Mst. Zia Gul as DM at GGMS Takot Battagram, Further Teacher Attendance Register GGMS written statement as well. Takot Battagram of the Period September 2006 to November 2009 was examined in original (copy attached) (F/D) where in attendance of Zia Gui as DM is not verified for the period claimed in the service book i.e (w.e.f. 15-03-2006 to 30-11-2009, Her salary too for the same period at Battagram has no whereabouts as per office record of district Battagram and at prima facile seems that salary has not drawn for the period mentioned above:

- The understaned also visited Office of the DEO (F) Mansehra on 26/9/2017 Office record regarding Mst Zia Gul Was searched by the concerned relevant staff But nothing was found regarding inter District Transfer order etc of Mst Zia Gul. It merits consideration that salary for the period November 2009 to July 2010 was drawn at District Mansehra (F/E).
  - Mist Zia Gul in her written statement (F/F) commented that in response to advertisement she applied for the post of DM at District Battagram. She took written test securing 48 marks out of 50 and also appeared for interview, on the basis of which selected and took charge of DM at GGMS Takot District Battagram and received salary for about 2 years but did not provide any supporting
    - DEO (F) Battagram vide (F/G) confirmed that office record regarding the appointment of Mst Zia Gui is silent and may he considered as take and bogus. documents in this regard.
      - DEO (F) Mansehia vide (F/H) asserted that whole documentation on behalf of this office from her transfer to this District at GGMS Mohandri and onward to District Charsadda is fake and boeus

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and Up at Kondi Advocato on Record Supreme Court of Pakislan

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#### Findings.

- Appointment Order of Mst Zia Gul as DM at GGMS Takot District Battagram is take and bogus as per record of the office of DEO (F)
- As per Teacher Attendance Register GGMS Takot District Battagram her attendance for the period March 2006 to November 2009 did not 11.
- Mst Zia Gui failed to provide any supporting documents before the committee in favor of duty performed/attendance, charge took over, ш. Inter District Transfer Orders, salary drawn at GGMS Takot District
- The then District Officer Education District Battagram viz Mr Wasiq Battagram etc. said confirmed the signatures on Appointment Order as well as entries IV. made in Service Book fake and Bogus.(F/C)
- Salary for the period September 2009 to July 2010 (9 months) drawn at Mansehra (F/D) but record /documentation in this regard is not traceable at the Office of DEO (F) Mansehra.
- Inter District Transfer order of Mst Zia Gul from District Battagram to District Mansehra is untraceable at the office of DEO(F) Mansehra. V١
- DEO (F) Mansehra vide her letter (F#) (does not confirm performance of duty at GGMS Mohandri while salary drawn and record in this regard is not traceable.
- Allied Bank Charsadda, Statement Period C1 January 2014 to 28 September 2017 (F/K) depicts on line transfer salary of Mst Zia Gul. VIII.

## Recommendations

- 1- District Education Officer (F) and District Accounts Officer District Marsehra are held responsible for drawl of illegal salary in R/O Zia Gul for the period November 2009 to July 2010.
  - 2- Recovery of salary drawn for the period November 2009 to July 2010 (9 Month) at Mansehra be made
  - (a) As such, the appointment Order as well as Service Book document. of Mst Zia Gulface concocted and hence be considered as null and void or otherwise:

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As a 2nd option if the Department deem it appropriate, Mst Zia Gul be reappeared for recruitment through NTS on the grounds of her academic qualification, experience/duty, against which she has received salary at GGMS Other Hameed Main Thungi Charsadda for the period on January 2014 to 28 September 2017. Thizar Hayat doopted Member Enquiry Officer

DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM /F.No.8/Vol-I 07 1 /2017 The District Education Officer, Female) Charsadda Subject: SERVICE VERIFICATION wemo: Reference your letter No.8956 dated 20. 12.2016 on the subject cited above and to state that the official record of this office is completely silent regarding the appointment under reference. Hence they may be considered fake and bogus please. The service book in respect Miss. Zia Gul, DM is returned herewith for further r:ecessary disposal please. DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM No 175 Mexical CERTIFIED TO BE TIME COPY Advocate-on Record Supreme Court of Pakistan

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#### PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

ORDER Writ Petition No.2028-P/2017
With COCN 177 F001711

Present:- Mr. Muhib Jan Salarzai, Advocate, for the petitioner.

Mr. Rab Nawaz Khan, AAG, for the respondents along with Ms Bushra Begum, ADEO, DEO(F) Office Charsadda.

Mst. Zia Gul wife of Hamayoun, the petitioner, allegedly serving as a Drawing Master BPS-15 and presently Posted in Govt Girls Middle School, Dheri Hamid Mian, District Charsedda, is aggrieved from the action of the respondents whereby her monthly salary has been withheld since January, 2017, without any legal justification.

Learned counsel for the petitioner contended that ever since her appointment way back in the year 2006 as a Drawing Master at GGMS Thakot Battagram, the petitioner has been regularly performing her duties and even after her transfer to District Charsadda, she has been regularly attending to her duty and she has been receiving her monthly salary as well, but all of a sudden, in pursuance of a letter addressed by DEO (female)

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Battagram, her salary has been withheld since, January 2017.

! On the previous date when learned AAG was confronted with the relief sought by the petitioner, he submitted that the very appointment order of the petitioner is take and that is how an enquiry is in progress in the matter which will take some time. In this view of the matter, this Court hold that as to why at Thakot Battagram for five long years and even after her transfer to District Charsadd in the year 2011, nobody in the Education Department noticed the appointment of the petitioner to be based on fake and bogus appointment letter and that in such like matters, it should not be merely an individual to be sent home packing but the responsible persons in the high echelons of Education Department should also be strictly proceeded against in accordance with law, however, the respondents were directed to release the salaries of the petitioner subject to the final outcome of the enquiry.

Since, the respondents have not paid released salary of the petitioner as directed by this Court, therefore, the petitioner has filed COC No.477-P/2017, which is also fixed today. Learned AAG accepted notice and reiterated that when appointment of the petitioner is fake and there is no record of the same, the respondents

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were unable to release the salaries of the petitioners.

Confronting with the stance of each other, the parties agreed and requested the Court for sending the matter to Anti Corruption Department for probe and proceedings. Accordingly, the matter is sent to the Director Anti Corruption Khyber Pakhtunkhwa with the direction to probe into the matter within a formight, positively and to submit report to this Court. Office is directed to send copy of writ petition and all documents annexed therewith coupled with the comments and documents brought on record by the respondents to the Director Ariti Corruption Khyber Pakhtunkhwa for doing the needful within a fortnight and to submit report on or before the date fixed. Adjourned to 11.10.2017.

JUDGE

Annexure-التارندان المان مومول على و برينكون د در شاعا . قد د سكى التوير د ساق ما مكر المادي بيل تعد مع كريم ويسهد عيدمان و مون عاريد. @ مكن معا ف مل يحر AT د ادم عن الم جدت في س شو الم و تن و مسمك ترمد ندى الم تاينه ولى في سل الروي كريد عاد ور مد يوره ال سعوب كا في ميل شير ١٥٦٦ كريد و ١٥١٥ بينا كورز و معنده على على المريد و المعلم المورده و النت مم مالم مع و على مريد و النورد و النت مم مالم مع و المريد و النورد و النت مم ما المريد و ال المنظمة المراجة المنابية والمستحدم في الم رن قور ملم تحرير على المالي الله المالية المالية الله المالية المالية يَعْنِي الْمِيرِا وْ شَرِكُ مِنْ وَاو صَيْفِهِ هِلَا مِهِ لَالْمِ مِنْ لِي وَرَسِنَ مِ مُنْ لِيكَ وَي حَدِينًا قَ العَرْم بِرْسُرِ لَشَيْرُ مَنْ حُرْمِيرُ جِرا فَي مِنْ عَلَى مِنْ لَحَا رمده برست، وننها DE مرسن طر شکرام تریز ۱۶ ﴿ عظیر صین و نرکار تریزاد على جارسية @ ورسى سند سرك عير ال و منز الا عامة في ميل الميرا في مسل المح مَا عَيْلِ اللَّهُ وَمُنَّا وَمِسِنَ مِلْ جَلَبَ مَرْ وَوَ فَرَكِرُومِي سَعِرِ فِي احتمارات مِي خَلْطَ فَا جَامُن الله على على المارين من المراي من الموسية من ميل مبلو 19/669 كرم المان و دروس ما مال مرام ما ما ما كر الم مارس مرا منه ما ما ما المان مسلم المرام المان مسلم المرام ت على الما من من من من من من من الله فراو دمور ومي و بن اور لنے کے مرتک ماکروں نے قلاف وال فيارة لرزجات ١٥٥٥ مع جر وتوان لهدر متدووره رصر كباجاتات ماما كوافرى كاروالاى مراكا المراكا رِّمْنِ الْرُووِالْ يَعْنَى وَمِلْكُولُ تَحْمِلُ مَا اشَاصْ مَا وَتَكْسِلْمُ مَا يَ اللَّهُ مَا يَعَ اللَّهُ ال ما الله تما يون مماروري عسس سن مرك حا COACECHO 9-10-017 اطلاع سے مجاطلات دہندہ کا وسخط موکا یاس کی مہر انشان لگایا جاسے گا۔اورانسر تربر کنندوابنداک اطلاع کا وسخط بلورتسد کی در دورانسان کی جاسکا کا جاری کا در انسان کی میران کا در انسان کی جاری کا در انسان کا در انسان کی در انسان کی جاری کا در انسان کی جاری کا در انسان کا در انسان کا در انسان کی در انسان کی در انسان کی در انسان کی جاری کا در انسان کی در انسان کا در انسان کی در انسان کی در انسان کا در انسان کی در انسان کا در انسان کار کا در انسان کار در انسان کا در انسا . ایک ملزم یا مشتیر کلی التر تسب داسطی باشند کان علاقه غیر یا دسازایشیا ریاا نفانستان جهال موزوں اول آلکستا جاستے -ATKESTED

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