

IN THE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL PESHAWAR

Amended Service Appeal No. 1163 /2022

~~Amended Service Appeal No. 1163/2022~~

Taib Hussain S/O Hilal Hussain (Ex- A T) Govt:High School Dran Shekhan
Central Orakzai, R/O Tapa Mir Was Khel, Hussaini Abad, P.O Kuriz, District
Orakzai. Appellant

VERSUS


District Education Officer Orakzai & Others Respondents

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Appellant

Through


Qaisar Abbas Bangash. 9/9/2022
Advocate Supreme Court.
Off: R, No.20, Khalil Plaza,
G.T.Road,Peshawar
Cell: 0300-5871466

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Orakzai. Appellant

VERSUS

1. District Education Officer, Orakzai, Umar Plaza, Main Kohat Road,
Muslimabad, Hangu.
2. Director Elementary & Secondary Education, Khyber Pakhtoonkhwa,
G.T Road, Peshawar.
3. Secretary, Govt; of K.P, Elementary & Secondary Education, Civil
Secretariat, Peshawar.

.....Respondents

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED ORDER ENDST: NO.813-20. DATED: 12/02/2022 OF
RESPONDENT NO.1. WHEREBY THE APPELLANT HAS BEEN REMOVED
FROM SERVICE ILLEGALLY AND AGAINST APPELLATE ORDER NO.6521-
24. DATED: 27/06/2022 COMMUNICATED TO THE APPELLANT DURING
PENDENCY OF APPEAL ON 16/08/2022 WHEREBY DEPARTMENTAL
APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD
GROUNDS.**

Respectfully sheweth,

1. That the appellant is the permanent resident of Village Tapa Mir Was
Khel, Hussaini Abad, P.O Kuriz, District Orakzai. (Copy of NIC is
attached as annexed-A).
2. That the Office of District Education Officer, Orakzai (Respondent
No.1) advertised in February 2020 different cadre Posts of
Male/Female Teachers in various Schools of Merged Tribal District
Orakzai through ETEA in Local News Paper. (Copy of
Advertisement is attached as annexed B).

3. That the appellant being permanent resident of Village Tapa Mir Was Khel, Hussaini Abad, P.O Kuriz, District Orakzai and **having the requisite qualifications i.e B.A with certificate of Shahadatul Alamia in Arabic and Islamiat duly applied for the Post of AT (Arabic teacher) BPS-15. (Copies of Academic Certificates are attached as annexed- C to G respectively.)**
4. That it is also pertinent to point out that the appellant had also obtained **certificate of Shahadatul Aalia in Arabic and Islamiat equivalent to B.A form Wifaqul Madaris Al-Shiatul Pakistan, Jamiatul Muntazir, Lahore. (Copies of Certificate of Shahadatul Aalia is annexed-H & H-1)**
5. That after passing ETEA test and fulfilling all codal formalities the appellant was appointed as AT (Arabic Teacher) School Based in BPS-15 in Govt: High School Dran Shekhan Central Orakzai vide Appointment Order Endst.No.6300-10, dated: 26/11/2020. **(Copy of Appointment Order Dated. 26/11/2020 is attached as annexed-I).**
6. That the appellant was performing his duties efficiently and without any complaints to the satisfaction of his superiors and in the meanwhile all the documents/certificates of the appellant were verified by Office of respondent No.1 from the concerned institutions and thereafter salary of the appellant was started in the month of August 2021.**(Copies of letters regarding verification of B A degree are annexed- J & K respectively)**
7. That an anonymous complaint was lodged before Pakistan Citizen Portal on 25/12/2021 regarding candidates possessing Degrees from fake, illegal and unrecognized institutions already appointed during 2019-20 & 2020-21.
8. That the Respondents also sent a letter to the Higher Education Commission of Islamabad on 11/01/2022 regarding recognition and affiliation of the Islamic University of Pakistan, Sialkot wherefrom the appellant had obtained his B A degree. And allegedly as per list of fake and unrecognized institutions in Punjab visible at HEC URL Islamic University of Sialkot, Punjab was found included in that particular list at Serial No.96.

9. That thereafter the appellant on the charge of either having fake degree or degree from fake, illegal and unrecognized University was suspended and an Inquiry Committee was constituted on 04/02/2022 to inquire about the said issue.
10. That the Inquiry Committee submitted its inquiry report on 11/02/2022 and in lights of their recommendations the competent authority (Respondent No.1) in exercise of Powers conferred under rules 4(b)-iii of Khyber Pakhtoonkhwa Government Servants (Efficiency & Discipline) Rules 2011, while imposing major penalty, removed the Appellant from Service Vide Order Endst No. 813-20, dated. 12/02/2022 on account of his B A degree obtained from fake, illegal, unlawful and unrecognized institution. **(Copy of Removal from Service Order No. 813-20, dated. 12/02/2022 is annexed-L)**
11. That aggrieved from the said impugned removal from service order dated. 12/02/2022 the appellant filed departmental Appeal before the Respondent No.2 which has been rejected by the appellate authority vide Order No.6521-24, dated-27/06/2022 communicated to the appellant on 16/08/2022 **(Copy of departmental appeal and rejection Order along with envelop are annexed- M & N).**
12. That the appellant feeling aggrieved of the said impugned orders and having no other remedy, approaches this Hon'ble Tribunal through the instant appeal for relief inter- alia on the following other grounds:-

GROUND:

- a. That the impugned Order dated 12/02/2022 and rejection Order dated-27/06/2022 are illegal, arbitrary, without lawful authority, discriminatory and against the law, rules and regulations, hence untenable and liable to be set aside.
- b. That no show cause notice or charge sheet was served upon the appellant and without providing opportunity of personal hearing/defense to appellant, the Department has conducted the so called inquiry in a short time and the appellant has been removed from service illegally ignoring the procedure provided under the Law, rules and regulations.

- c. That after appointment all the academic certificates/documents of the appellant were duly verified and scrutinized by the concerned authorities and thereafter the appellant served the department from 26/11/2020 to 12/02/2022 for about 15 months receiving his monthly salaries.
- d. That after leveling the charge of B.A degree obtained from fake, illegal and unverified university of Sialkot, the appellant submitted another certificate of Shahadatul Aalia in Arabic and Islamiat equivalent to B.A form Wifaqul Madaris Al-Shiatul Pakistan, Jamiatul Muntazir, Lahore, before Respondent No.1 for consideration, but the same was not considered at all.
- e. That as per W.P no.470-M/2016 decided on 20/03/2018 titled "Faiz Ur Rehman Vs Director E & S Education & Others" the Hon,ble High Court, Peshawar in similar issue/cases of degrees/diploma's being obtained from fake, illegal or unrecognized Universities has held that " **all those who have been appointed and are still in Service on the basis of said degrees etc are given two years' time to get equivalent qualification from any recognized University** ", but the Respondents/Department totally ignored the same principle and while imposing major penalty, removed the appellant from service, which is illegal, arbitrary and harsh in the eyes of law.
- f. That the appellant has also passed/obtained his B.A degree from Gomal University, D.I Khan in December 2020 and if the appellant would have given proper opportunity of personal hearing the same fact would definitely come in the knowledge of the respondents and the Order of removal from Service of appellant might have not happened. **(Copy of B.A degree is annexed-O & O/1)**
- g. That by accepting the offer of appointment validly made to the appellant by the department on the basis of his qualifications a valuable right had accrued to him and he could not be made to suffer for the mistake or error of others/officials. Indeed the offer had been accepted and acted upon for almost 15 months, **thus the case of the appellant be governed by the principle of Locus Poenitentia** and the department cannot retrace the steps already taken and lawfully acted upon by the appellant. Reliance is placed on C.P No.4439 of 2017, decided on 18/10/2019.
- h. That any other ground if needed will be raised at the time of arguments with the permission of this Hon'ble Tribunal.



PRAYER:

It is therefore, very humbly prayed, that on acceptance of this appeal the impugned Orders Endst No. 813-20, dated. 12/02/2022 and 27/06/2022 being illegal, arbitrary, discriminatory, without lawful authority, against the law, facts, rules and regulations may very graciously be set aside and the appellant may graciously be reinstated in Service with all back benefits.

Any other relief not specifically prayed for may also be granted to the appellant in the interest of law.


Appellant

Through


Qaisar Abbas Bangash 9/9/2022
Advocate Supreme Court
of Pakistan

CERTIFICATE:

Certified that as per instructions received from my client, this is the first Appeal before this Hon'ble Tribunal.


Advocate

LIST OF BOOKS:

- 1- Service Tribunal Act 1974
- 2- The Khyber Pakhtoonkhwa Government Servants (Efficiency & Discipline) Rules 2011
- 3- Any other Book or Case Law according to need.


Advocate



IN THE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL PESHAWAR

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in
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 Central Orakzai, R/O Tapa Mir Was Khel, Hussaini Abad, P.O Kuriz, District
 Orakzai. Appellant

VERSUS

District Education Officer Orakzai & Others Respondents

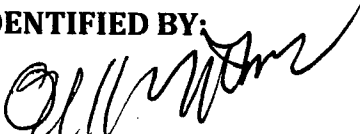
AFFIDAVIT

1 Taib Hussain S/O Hilal Hussain, R/O Tapa Mir Was Khel, Hussaini
 Abad, P.O Kuriz, District Orakzai. do hereby affirm and declare on oath that
 contents of the accompanying Service Appeal are true and correct to the best
 of my knowledge and belief and that nothing has been concealed from this
 Hon'ble Tribunal.


DEPONENT

CNIC NO. 21603-2506277-1

IDENTIFIED BY:


 Qaisar Abbas Bangash
 Advocate Supreme Court of
 Pakistan.

IN THE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL PESHAWAR

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Taib Hussain S/O Hilal Hussain (Ex- A T) Govt:High School Dran Shekhan
Central Orakzai, R/O Tapa Mir Was Khel, Hussaini Abad, P.O Kuriz, District
Orakzai. Appellant

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District Education Officer Orakzai & Others Respondents

MEMO OF ADDRESSES

APPELLANTS:


Taib Hussain S/O Hilal Hussain (Ex- A T) Govt:High School Dran Shekhan
Central Orakzai, R/O Tapa Mir Was Khel, Hussaini Abad, P.O Kuriz, District
Orakzai.

RESPONDENTS:

1. District Education Officer, Orakzai, Umar Plaza, Main Kohat Road,
Muslimabad, Hangu.
2. Director Elementary & Secondary Education, Khyber Pakhtoonkhwa,
G.T Road, Peshawar.
3. Secretary, Govt; of K.P, Elementary & Secondary Education, Civil
Secretariat, Peshawar.


Appellant

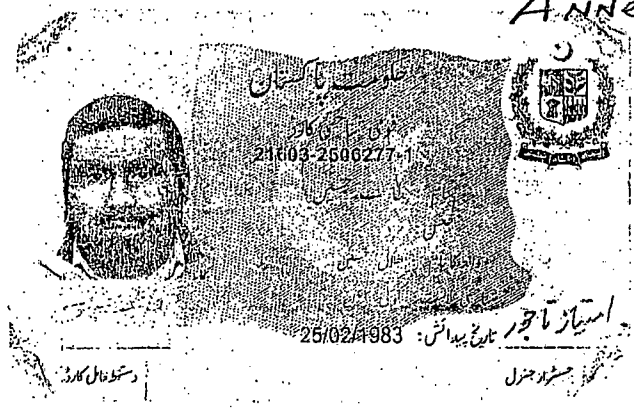
Through


Qaisar Abbas Bangash
Advocate Supreme Court
Of Pakistan

8

Annexed

A



Y5547T نامہ داران نمبر 21603-2506277-1
 14783419728
 29/01/2024 29/01/2014
 کھنڈہ کارڈ کے ہر زون میں کس میں ڈال دیں



[Handwritten Signature]
ATTESTED

S.No. KB _____

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 83468

48021

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT

(N.W.F.P. Pakistan)

Secondary School Certificate Examination SESSION: 2005 - ANNUAL

THIS IS TO CERTIFY THAT Taib HussainSon/Daughter of Hilal Hussain and astudent of District Hangu has passedthe *Secondary School Certificate Examination* of the Board of Intermediate andSecondary Education, Kohat held in March, 2005 as a Privatecandidate. He/She obtained 503 Marks out of 1050 and has been placed inGrade D Representing Fair.

The Candidate passed in the following subjects:

- | | | | |
|----------------|---------------------------|---------------------------|-----------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pak. Studies |
| 5. Mathematics | 6. <u>General Science</u> | 7. <u>Islamic Studies</u> | 8. <u>ART</u> |

Date of birth according to admission form is 25-Feb-1983

Nayyer
Asstt. Secretary

Nayyer
HEAD MASTER
G.H.S DRAN SHEIKHAN,
DISTRICT ORAKZAI

Nayyer
Secretary

This certificate is issued without alteration or erasure.

Ahmed
Durwan

S.No. KB

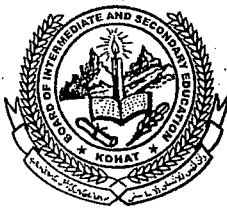
35846

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 48158

Annexed - "D"

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT (N.W.F.P. Pakistan) INTERMEDIATE EXAMINATION

HUMANITIES GROUP
Session 2008 (ANNUAL)

This is to Certify that Taib Hussain

Son/Daughter of Hilal Hussain

and a student of District Hangu

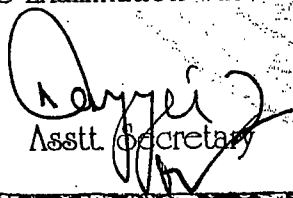
Registered No. 1955-BK/P-2006 has passed the Intermediate Examination

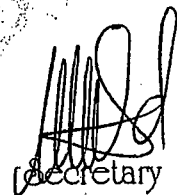
of the Board of Intermediate & Secondary Education, Kohat held in May, 2008

as a Private candidate. He/She obtained 549 marks out of 1100 and has

been placed in D Grade Representing Fair

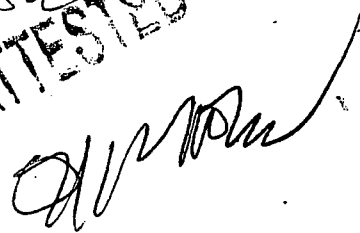
The Examination was taken as a whole / in parts.


Asstt. Secretary


Secretary

This certificate is issued without alteration or erasure.

ATTESTED



Islamic University Of Pakistan



Roll Number: 37827

Result : Pass



12

Annexed **E**

Registration Number: 27227-E-2012

PROVISIONAL RESULT INTIMATION Bachelors of Arts Annual Part I/II Examination, 2014 Group: Arts

Name : TAIB HUSSAIN

Father's Name : HILAL HUSSAIN

Institution/District : SJALKOT



He/She has secured the marks as detailed below against subjects.

Sr. No.	Subject	Total Marks	Part-I	Part-II	Total	Status	
						I	II
1	English	200	57	62	119	Pass	Pass
2	Pak Studies	50	32		32		Pass
3	Islamic Education	50		35	35	Pass	
4	Punjabi	200	51	63	114	Pass	Pass
5	Education	200	55	59	114	Pass	Pass
6	Civics	100		61	61		Pass
Total		800			475	Grade: B	

The Candidate has passed and Obtained Marks Four Hundred & Seventy Five

Disclaimer:

This card is issued provisionally, error and omissions expected, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Prepared By: W. Khan

Checked By: [Signature]

Date: 05, August, 2014

HEAD MASTER
G.H.S DRAN SHEIKHAN
DISTRICT ORAKZAI

Controller of Examinations



[Signature]
[Signature]

وفاق المدارس الشيعية باكستان

المركز: جامعة المنتظر لاهور

كشف الدرجات

شهادة العالمية في العلوم العربية و الاسلامية (المساوية : بالماجستير بالعربية / الاسلاميات)

نتيجة امتحان السنوي / الصكونى عام ٢٠٠٧

رقم التسجيل ٥٠/٠٧

رقم الجلوس ٥٨١٠

اسم الوالد هلال حسين

الاسم طائب حسين

محل الإقامة اوركزئي ايجنسى

تاريخ الميلاد ١٩٨٣/٢/٢٥

الدرجات المكتسبة	الدرجات المجموعة	المادة
٨٩	١٠٠	الادب / التاريخ
٨٤	١٠٠	الفقه
٨١	١٠٠	أصول الفقه
٨٨	١٠٠	التفسير
٨٨	١٠٠	الحديث
٩٠	١٠٠	المنطق / الفلسفه
٨١	١٠٠	اللغة العربية
٣٩	٥٠	الشفوى
٦٤٠	٧٥٠	المجموع

النتيجة: الناجح / الراسب الدرجة الاولى تاريخ الاجراء ٢٠٠٧/٣/١٤

مراقب الامتحانات

١٤٤٦

مراقب المكتب

ATTESTED



قلم المجلس ٥٨١٠
 رقم التسجيل ٥٠/١٠٧
وَفَّاقُ الْمَدَارِسِ الشَّيْخِيَّةِ بِپَاكِسْتَانِ
 بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

الحمد لله رب العالمين والصلوة والسلام على خاتم الانبياء والمرسلين والحمد للطيبين الطاهرين واصحابه المنتجبين اما بعد فان الهيئة المديرية لوفاق المدارس الشيعية بباكستان تشهد وتوثق بان طائب حسين

ابن/بنات هلال حسين — تاريخ ميلاده/ميلادها ١٩٨٣/٢/٢٥ م — مسكان اوركني اجنسي — قد اتم/اتممت الدراسة النهائية ونجح/نجحت وفازت امتحانها النهائي المنعقد تحت اشراف وفاق المدارس الشيعية بباكستان في الدرجة الاولى — وبناء على ذلك قد استحق/استحقت الشهادة العالمية في العلوم العربية والاسلامية السلطان الافاضل نوصيه/نوصيها بتقوى الله تعالى فان خيرا لئلا التقي والعمل الصالح والاعتصام بالله العزيز هو نعم المولى ونعم النصير

محل الاصدار جامعة المنتظر لاهور
 تاريخ الاصدار ٢٠٠٧/٣/١٤ م
 رئيس الوفاق
 الامين العام



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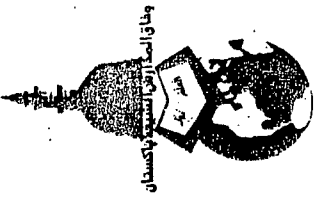
بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

15

Annals - #

الشهادة العالية

في العلوم العربية والإسلامية
شمس الأفاضل - العادل - بي اس
وفاق المدارس الشيعية باكستان



مطابق لاسلام

رقم التسل ٧٥/٥٤
رقم الجلوس ٥٤٧٦

الحمد لله رب العالمين والصلوة والسلام على خاتم الانبياء والمرسلين وعلى آله الطيبين الطاهرين ائمة
فانا نصدق ونوثق بان طاب حسين ابن/بنت هلال حسين

تاريخ ميلاده/ميلادها ١٩٨٣/٢/٢٥ ومن سكان اوركوتكي اعرجسي

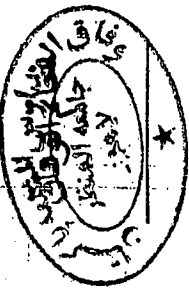
قد حصل/حصلت الشهادة العالية في العلوم العربية والإسلامية بعد اتمام الدراسة النهائية
في هذا الصف واحتياز الامتحان المنفرد باشراف وفاق المدارس الشيعية باكستان في ٢٠٠٤

بتقدير _____ وعدد درجات/درجاتها ٥٩٦/٧٥٠

فقط ونسأل الله عز وجل ان يبلد بها سبيل الهدى ونوصيه/نوطبها بتقوى الله والعمل الصالح والاعتصام
بالله العزيز

توقيع الرئيس

توقيع الامين العام



محل الاصدار تاريخ الاصدار
جامعة المنظر لأمير ٢٠٠٥/٤/١٦

وفاق المدارس الشيعه باكستان

المركز: جامعة المنتظر لاهور

كشف الدرجات

شهادة العالیه فی العلوم العربیة والاسلامیة (المساویة: بکالوریوس العربیہ/الاسلامیات)

نتیجة امتحان السنوی / الضمینی عام ۲۰۰۴

رقم التسجيل ۷۵/۰۴

رقم الجلوس ۵۴۷۶

اسم الوالد هلال حسین

الاسم طائب حسین

محل الإقامة اورکزئی ایجنسی

تاریخ الميلاد ۱۹۸۳/۲/۲۵

المادة	الدرجات المجموعه	الدرجات المكتسبه
التفسير	۱۰۰	۸۹
الحديث	۱۰۰	۸۵
العقائد/الادب	۱۰۰	۸۱
الفقه	۱۰۰	۸۰
أصول الفقه	۱۰۰	۸۰
النحو	۱۰۰	۸۱
المنطق/الفلسفه	۱۰۰	۶۵
الشفوی	۵۰	۳۵
الميزان	۷۵۰	۵۹۶

الدرجة الاولى تاریخ الاجراء ۲۰۰۵/۴/۱۶

النتیجة: الناجح/الراسب

مراقب الامتحانات

مراقب المكتب

ATTESTED

Signature



(17)
OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Phone No. 0925-690017

Annexed - 9

APPOINTMENT ORDER:

Consequent upon recommendation of the Departmental Selection Committee dated 26/11/2020, appointment of the following male candidates are hereby ordered against the post of Arabic Teacher (AT) school based in BPS: 15 @ (Rs.16120-1330-56020/- (Rs. 16120) fixed) plus usual allowances as admissible under the rules on adhoc school based policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect.

S#	Roll No.	Name	Father Name	CNIC#	Score	Place of Posting/ Remarks
1	1360	SYED TAJDAR HUSSAIN	SYED SAGHIR HUSSAIN	2160340448637	105.34	GHS Khawa Stori Khel
2	2153	IFTIKHAR ALI	NOOR GHULAM	2160379869447	103.23	GHS Tooti Bagh
3	2677	MUHAMMAD IKRAM	MOLANA ABDUL JABBAR	2160182774649	103.19	GMS Toor Kanri
4	2278	KHALIL REHMAN	FAZAL JALIL	1410116888007	102.84	GMS Yakho Kandow
5	2123	FARMAN ULLAH	KHUDAM UD DIN	2160193526329	100.30	GMS Goe
6	1192	NIJAT HUSSAIN	ALEEM HUSSAIN	1430170025557	96.30	GMS Safi eeroz Khel
7	1213	MUHAMMAD HUSSAIN	MASTAN GUL	1410142821825	91.95	GMS Zanka Khel
8	1116	TAIB HUSSAIN	HILAL HUSSAIN	2160325062771	90.50	GHS Dran Sheikhan

TERMS & CONDITIONS:

- 1) No TA/DA etc is allowed.
- 2) Charge reports should be submitted to all concerned in duplicate.
- 3) Appointment is purely on adhoc basis initially for one year.
- 4) They should not be handed over charge if they/he/she exceeds 35 year or below 18 years of age. Age relaxation case may be submitted to competent authority.
- 5) Appointment is subject to the condition that the certificates/documents/CNIC/Domicile must be verified from the concerned authority by the District Education Officer (Male) District Orakzai. Anyone found producing bogus/fake/forge/tempered

AT (Male) Appointment Order 2020 Page 1 of 3

District Education Officer
Orakzai District at Hangu

ATTESTED

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Certificate/Testimonials will be reported to the law enforcing agencies for further course of action(s) and his/her appointment shall stand as cancelled.

- 6) Their services are liable to termination on one month's notice from either side. In case of resignation without notice his one month pay and allowances shall be forfeited to the Government.
- 7) Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that their (his/her) certificates are verified.
- 8) They should join their (his/her) post within 15 days. In case of failure to join their (his/her) post within 15 days their (his/her) appointment shall stand cancelled automatically and no subsequent appeal etc shall be entertained.
- 9) Health & Age Certificate should be produced from the Medical Superintendent DHQ Hospital Orakzai before taking over charge.
- 10) They (he/she) will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 11) Their (his/her) service shall be terminated at any time, in case their (his/her) performance are (is) found unsatisfactory during their (his/her) contract period. In case of misconduct, they (he/she) shall be proceeded under the rules framed from time to time.
- 12) Their (his/her) appointment are (is) made on school base, they (he/she) will have to serve at the place of posting, and their services are (is) not transferable to any other station.
- 13) Before handing over charge once again their documents may be checked if they have not the required qualifications, they may not handed over the charge.
- 14) If any meritorious candidate is deprived from appointment by this order and the competent authority accept his/her appeal, the appointment order of the low merit candidate will be withdrawn in favor of meritorious candidate.
- 15) In case of any discrepancy in documents, oversight or clerical mistake, the competent authority has the right to modify or withdrawn appointment order of a candidate according to rules/policy.
- 16) Posting/adjustment on the advertised/available vacancies is the discretionary powers of the appointing authority and no one has the right to claim for adjustment at a specific school.
- 17) The competent authority reserved the right of corrigendum if needed.
- 18) Salaries will be paid subject to the provision of duty certificate from concerned Head/DDO.
- 19) Errors & omissions will be acceptable within the specified period.


District Education Officer
Orakzai District at Hangu


DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

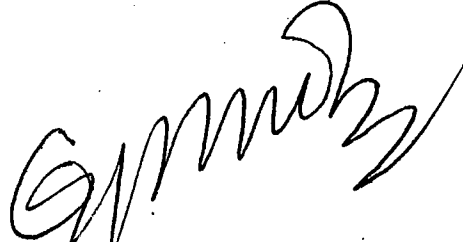
Endst.No. 6300-10 /

Dated: 26/11/2020

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.


ATTESTER



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2. PS to Secretary (E & SE) to the Govt. of Khyber Pakhtunkhwa, (E & SE) Deptt., Civil Secretariat Peshawar.
3. PA to Director (E & SE), Khyber Pakhtunkhwa, Peshawar.
4. Deputy Commissioner, Orakzai.
5. District Account Officer, Orakzai.
6. Principals/Head Masters/Headmistress concerned.
7. District Monitoring Officer, Orakzai.
8. Assistant Programmer/CO, EMIS Cell Local Office.
9. Budget & Account Officer/Accountant/Pay Clerk/, Local Office.
10. Candidate concerned.
11. Office Copy.

~~_____~~
DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

~~_____~~
District Education Officer
Orakzai District at Hangu

~~_____~~
ATTESTED

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Amir J



District Education Office
Orakzai District at Hangu

No: 6384
Dated 21/6 2021

PHONE: 0925-690017 FAX 0925-690017

To

The Controller of Examination
Islamic University Of Sialkot

Subject: VERIFICATION OF DOCUMENTS

Memo

Please refer to this office litter No 1003 Dated 8/2/2021 but same were still awaited.

It is therefore requested that the same is resubmitted along with the photo copy of the degree/Bank draft for verification and early returned please.

District Education Officer
District Orakzai

ATTESTED



OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohal Road, Muslimabad-Hangu.
Phone # 0925-690017 Fax # 0925-690017
Email: deorakzal2020@gmail.com



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ORDER:

Annexed

WHEREAS Mr. Taib Hussain, AT Govt. High School Dran Sheikhan Central- Orakzai was proceeded under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 for the charges mentioned in Inquiry report.

AND WHEREAS, A Pakistan Citizen Portal Complaint (PCP) bearing Complaint Code KP241221-89483632 (AB) dated 25/12/2021 was lodged by the citizen regarding candidates possessing degree from fake, illegal & unrecognized institutions already appointed during 2019-20 & 2020-21.

AND WHEREAS, A letter has been sent to the Higher Education Commission (HEC) Islamabad bearing No. 200, dated 11/01/2022 regarding recognition & affiliation of the Islamic University of Pakistan Sialkot & subsequent list of Fake, Illegal, Unlawful and Unrecognized Institutions in Punjab, visible at HEC URL: <https://www.hec.gov.pk/english/universities/Pages/AJK/Illegal-DAIs.aspx>, wherein Islamic University of Sialkot Punjab is included in that particular list at Serial No. 96 in Punjab Province.

AND WHEREAS, Mr. Taib Hussain s/o Hilal Hussain Arabic Teacher (AT) BPS: 15 at GHS Dran Sheikhan Central Orakzai bearing CNIC No. 21603-2506277-1, bearing Personal No. 00976636 has been suspended on the charge of either having fake degree or degree from fake, illegal, unlawful and unrecognized-university. i.e Islamic University of Sialkot Punjab.

AND WHEREAS, the following inquiry committee has been constituted to make free & fair inquiry regarding fake degrees obtained from fake universities by the ETEA appointees during 2019-20 & 2020-21 (Teaching Cadre) in E&SED District Orakzai vide No. 698, dated 04/02/2022.

1. Mr. Saif Ullah Khan, Principal BPS: 18 GHS Mandali, District Orakzai.
2. Mr. Noor Hassan, Head Master BPS: 17, GHS Saifal Dara, District Orakzai.
3. Mr. Shakeel Ahmad, SST BPS: 16, GHS Sawaro Kot, Orakzai.

Terms of References (TORs) of the Inquiry Committee:

- Detail investigation regarding PCP complaints on the individuals who have acquired degrees from fake universities and got appointed during 2019-20 & 2020-21 in E&SED District Orakzai via ETEA/NTS.
- Finding all the teaching cadre ETEA appointees (M/F) in 2019-20 & 2020-21 who possess degrees from Fake, Illegal, Unlawful and Unrecognized Institutions (list attached) in E&SED district Orakzai.
- Checking of verified degrees from the concerned university as per degrees of the final merit list.
- Proposed/Recommended action(s) against the culprits if any under E & D Rules-2011 (Amended).
- Precautionary Measurements for future reference.
- A detail report must be submitted to the undersigned for perusal within 15 days positively

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AND WHEREAS, the Inquiry report submitted by the Inquiry Officers vide No. 39, dated 11/02/2022 with the following recommendations:

1. Mr. Taib Hussain s/o Hilal Hussain Arabic Teacher (AT) BPS: 15 at GHS Dran Sheikhan Central Orakzai bearing CNIC No. 21603-2506277-1, bearing Personal No. 00976636 has obtained his BA degree

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annexed at F is hailed from fake, illegal, unlawful and unrecognized institutions i.e Islamic University of Pakistan Sialkot, Punjab present at Serial No. 96 at HEC URL: <https://www.hec.gov.pk/english/universities/Pages/AJK/illegal-DAIs.aspx>. Hence, liable to be treated under the terms & conditions of his appointment order at Serial No. 5.

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2. Mr. Taib Hussain s/o Hilal Hussain Arabic Teacher (AT) BPS: 15 at GHS Dran Sheikhhan Central Orakzai bearing CNIC No. 21603-2506277-1, bearing Personal No. 00976636 is accountable to be treated under the Rule-4(b)-iii of the Khyber Pakhtunkhwa, Government Servants Efficiency & Discipline Rules 2011 (Amended).
3. His already drawn salary is justifiable as he has performed his duty since 26-11-2020 to 31-01-2022 at GHS Dran Sheikhhan, Central Orakzai.
4. Instead of the accused AT, agents for selling degrees from fake, illegal, unlawful and unrecognized institutions should be reported to the law enforcement agencies for proceeding under the rules & policy en Vogue.
5. FIR may be lodged against the defaulters (degree selling agents) from fake, illegal, unlawful and unrecognized institutions (Islamic University of Pakistan Sialkot, Punjab).

AND WHEREAS, the competent authority (Farid Ullah Mehsud District Education Officer-Orakzai) after considering the charges and evidences on record, is of the firm view that the charges leveled against him, have been proved & genuine. His act tantamount to misconduct so the instance case is treated under the Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 ibid.

NOW THEREFORE, in exercise of the power conferred under rules 4(b)-iii of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the competent authority (FARID ULLAH MEHSUD DISTRICT EDUCATION OFFICER-ORAKZAI) is pleased to impose major penalty "REMOVAL OF SERVICE" upon MR. TAIB HUSSAIN S/O HILAL HUSSAIN ARABIC TEACHER (AT) BPS: 15 AT GHS DRAN SHEIKHAN CENTRAL ORAKZAI BEARING CNIC NO. 21603-2506277-1, BEARING PERSONAL NO. 00976636 with immediate effect on account of his BA degree obtained from fake, illegal, unlawful and unrecognized institutions i.e Islamic University of Pakistan Sialkot, Punjab present at Serial No. 96 at HEC URL: <https://www.hec.gov.pk/english/universities/Pages/AJK/illegal-DAIs.aspx>.


DISTRICT EDUCATION OFFICER,
ORAKZAI

Endst No: 813-20

Dated: 12/02/2022

- 1) Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2) District Monitoring Officer, Orakzai.
- 3) Deputy DEO (M/F), local office.
- 4) District Accounts Officer, Orakzai.
- 5) ASDEO/ADEO concerned local office.
- 6) Head Master GHS Dran Sheikhhan, Central Orakzai for further necessary legal action under intimation to this office.
- 7) Accountant, local office.
- 8) Mr. Taib Hussain, AT BPS: 15, GHS Dran Sheikhhan, Central, Orakzai.


DISTRICT EDUCATION OFFICER,
ORAKZAI


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Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

PH No. 091-9330242 Fax 091-9210936

No. 6521-24

/EM/II M/Orak Vol: 01

Dated 27/6/2022



To

✓
Mr. Taib Hussain
Ex-AT GHS Drang Sheikhan
District Orakzai.

Subject:

APPEAL FOR RE-INSTATEMENT.

Memo:

I am directed to refer to the subject cited above and to state that after perusal of the entire record and HEC's letter No.15 (23)A&A/Acc/HEC-2014/2553, dated March 11, 2022 wherein the university concerned has been declared as illegal/Fake, the competent Authority is pleased to reject your appeal dated 17.03.2022.

(Signature)
27/6/2022
Assistant Director (Estab.)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst. of even No. & Date:

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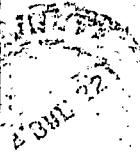
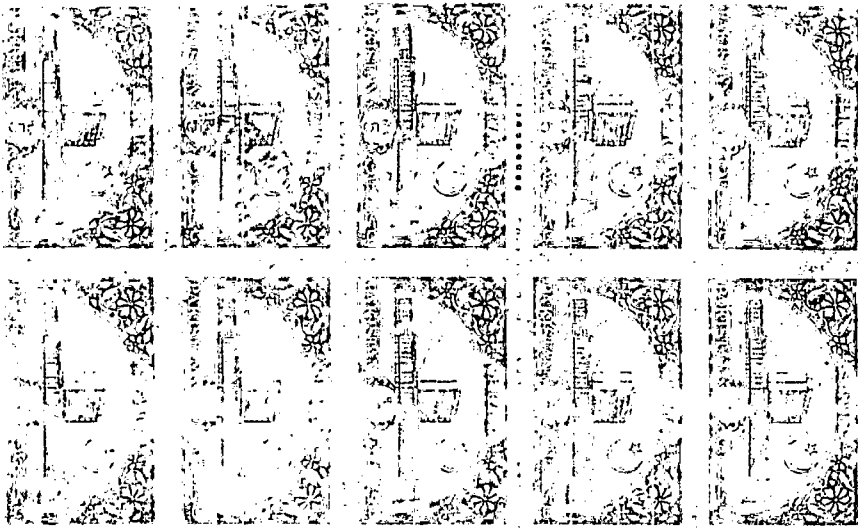
1. Managing Director (ETEA) Sector E-8, Street 13, Plot No 22 near Hajj Complex Phase 7 Hayatabad, Khyber Pakhtunkhwa Peshawar. with the request not to entertain in future the application of such candidate, bearing CNIC No.21603-2506277-1 who possesses the academic & professional qualification of fake institutions as declared by HEC.
2. District Education Officer (M) Orakzai.
3. PA to Addl: Director Education, (Estab.) Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab.)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Monday, June 27, 2022 C:\Users\Asghar Gul\Desktop\AD Estab (Male)-II\All Districts MNDs\Orakzai\Appeal Talib Hussain TT Orakzai.docx

(Signature)
(Signature)

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Directorate of Education
Mumbai
Registered Address: - 35/2

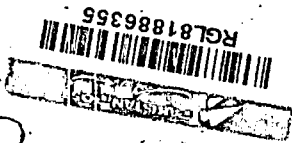
(UK Post)

REGISTERED

Disette Daktar

Govt High School Drang Sheikhan 162

The Mr. Habib Hussain



(UK Post)

D.R.S.P.

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25/2

Serial No. GU 008864

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

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GOMAL UNIVERSITY
DERA ISMAIL KHAN
KHYBER PAKHTUNKHWA, PAKISTAN



Registration No. 5927-DESOBA-20

Roll No. 23189

(Session 2020 ANNUAL)

TAIB HUSSAIN

SON of

HILAL HUSSAIN

a student of DISTANCE EDUCATION STUDY CENTER KOHAT

has passed the prescribed Examination in OCTOBER/NOVEMBER 2020

is hereby awarded the Degree of

BACHELOR OF ARTS

in FIRST Division by GOMAL UNIVERSITY.

The Examination was taken as a whole / in parts.

Result declared on DECEMBER 22, 2020

Countersigned


Controller of Examinations


Vice Chancellor

No 132242

GOMAL UNIVERSITY

DERA ISMAIL KHAN
(Khyber Pakhtunkhwa, Pakistan)

DETAILED MARKS CERTIFICATE

BACHELOR OF ARTS PART - II

Held in October - November :- 2020

Session 2020/ Annual

Roll No. 23189Name. Taib HussainThe Candidate secured the following marks & has been placed in **First** Division.

SUBJECT	Total No of Marks Allotted	Marks Obtained	
		In Figure	In Words
English	75	41	Forty One
Urdu	75	57	Fifty Seven
Pashto	75	-	
Arabic	75	-	
English Elective	75	-	
Statistics	75	-	
Geography	75	-	
History	75	-	
Economics	75	-	
Political Science	75	-	
Islamic Studies	75	45	Forty Five
Law	75	-	
Education	75	-	
Sociology	75	-	
Psychology	75	-	
Health & Physical Education	75	-	
Math-A	75	-	
Math-B	75	-	
Pak Study	40	22	Twenty Two
Aggregate Part-I	285	185	One Hundred Eighty Five
Total	550	350	Three Hundred Fifty

Result Declaration Date: 22-12-2020

Errors & Omissions Accepted

Taib Hussain
Gomal

Controller of Examinations
Gomal University, D.I.Khan

28

N^o 132172

GOMAL UNIVERSITY



DERA ISMAIL KHAN

(Khyber Pakhtunkhwa, Pakistan)

DETAILED MARKS CERTIFICATE

BACHELOR OF ARTS PART - I

Held in October - November :- 2020

Session 2020/ Annual

Roll No. 23189Name. Taib HussainThe Candidate secured the following marks & has been placed in ~~XXXXX~~ Division.

SUBJECT	Total No of Marks Allotted	Marks Obtained	
		In Figure	In Words
English	75	47	Forty Seven
Urdu	75	55	Fifty Five
Pashto	75	-	
Arabic	75	-	
English Elective	75	-	
Statistics	75	-	
Geography	75	-	
History	75	-	
Economics	75	-	
Political Science	75	-	
Islamic Studies	75	40	Forty
Law	75	-	
Education	75	-	
Sociology	75	-	
Math-A	75	-	
Math-B	75	-	
Psychology	75	-	
Health & Physical Education	75	-	
Islamiyat ©	60	43	Forty Three
Total	285	185	One Hundred Eighty Five

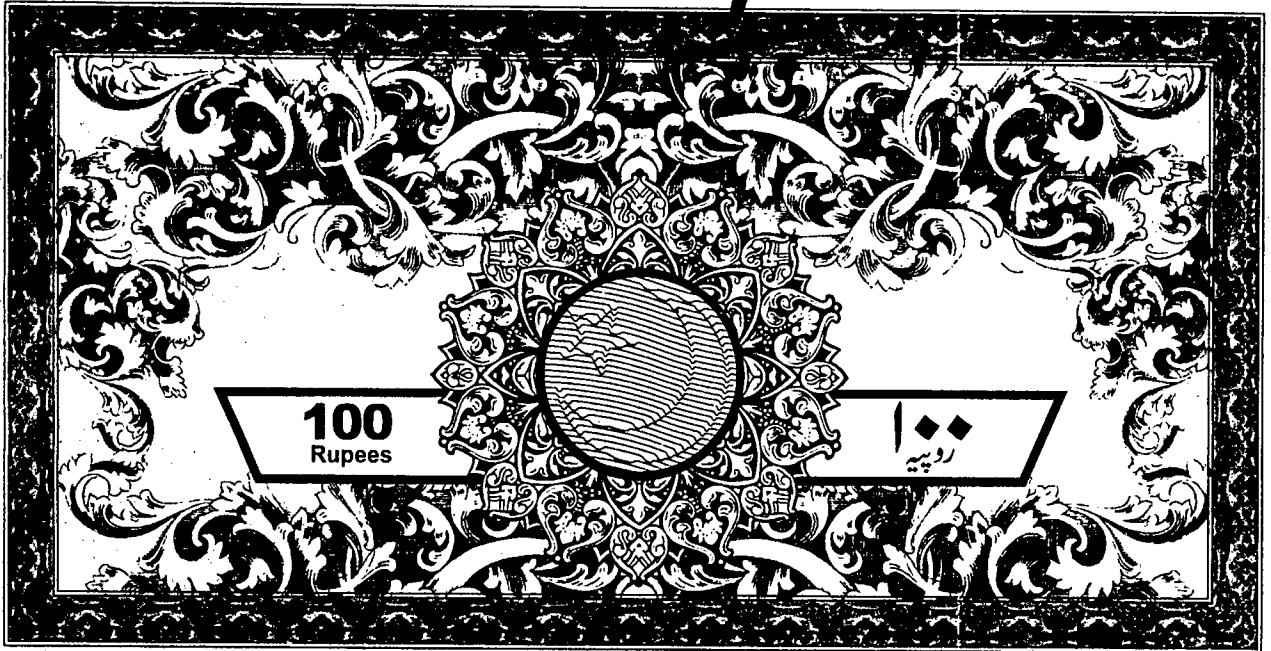
Result Declaration Date . 22-12-2020

Errors & Omissions Accepted

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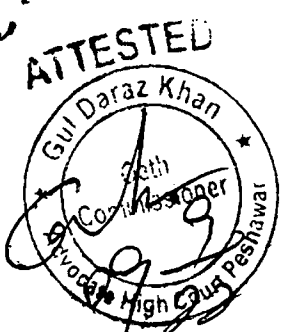
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Controller of Examinations
Gomal University, D.I.Khan



بیان حلف

مندرجہ ذیل طاہرہ العین و ام ولدہ لعل حسنہ مسکنہ مقبہ میرداد میں خلیل حسین آباد دیکر فیہ طلوع اور کمر کی
 کامیوں حلفاً "بیان کم کامیوں" کہ میں اس سے پہلے میرداد سے بیعت ہوئی تھی کہ صرف ڈیپارٹمنٹ اور
 محمد متھیا - ڈیپارٹمنٹ اور کمر کی خدمت میں رہنے کے لئے میرداد میں مقیم رہا تھا جو کہ جو اب
 میرداد میں مقیم ہوں۔ میرداد میں مقیم رہنے کے لئے میرداد میں مقیم رہا تھا جو کہ جو اب
 ستمبر 1163/2022ء کو میرداد میں مقیم رہا تھا جو کہ جو اب
 ڈیپارٹمنٹ اور کمر کی خدمت میں مقیم رہا تھا جو کہ جو اب
 پٹی حلف 22/8/2022ء کو میرداد میں مقیم رہا تھا جو کہ جو اب
 یہ کہ میرداد میں مقیم رہا تھا جو کہ جو اب
 کوئی ہے جو کہ میرداد میں مقیم رہا تھا جو کہ جو اب
 سکول کے پتہ اور کمر کی خدمت میں مقیم رہا تھا جو کہ جو اب
 ڈیپارٹمنٹ اور کمر کی خدمت میں مقیم رہا تھا جو کہ جو اب
 وہ میرداد میں مقیم رہا تھا جو کہ جو اب
 نے میرداد میں مقیم رہا تھا جو کہ جو اب
 کہ میں نے آج میرداد میں مقیم رہا تھا جو کہ جو اب
 میرداد میں مقیم رہا تھا جو کہ جو اب
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 میرداد میں مقیم رہا تھا جو کہ جو اب



حالیہ طاہرہ العین و ام ولدہ لعل حسنہ
 طاہرہ العین و ام ولدہ لعل حسنہ
 1163-21603-2506277-1

