

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

Service Appeal No. 14047/2020

BEFORE: **MR. KALIM ARSHAD KHAN, ... CHAIRMAN**
MR. MIAN MUHAMMAD ... MEMBER(E)

**Bibi Razia W/O Noor Zaman R/O Toppi Kala, The.Takht-e-Nasrati,
District Karak.(Appellant)**

Versus

1. **Director E&SE Department, Government of Khyber Pakhtunkhwa, Peshawar.**
2. **Secretary, E&SE Department, Government of Khyber Pakhtunkhwa, Peshawar.**
3. **Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar.**
4. **Chief Minister, Government of Khyber Pakhtunkhwa, Peshawar.
....(Respondents)**

Mr. Shahid Qayum Khattak,
Advocate

For appellant.

Mr. Kabirullah Khattak,
Addl. Advocate General

For respondents.

Date of Institution.....05.11.2020
Date of Hearing.....21.04.2022
Date of Decision.....21.04.2022

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN. This appeal has been filed by the appellant under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 15.11.2019 passed by respondent No. 3 by way of which the appellant has been awarded major penalty of reduction to lower pay stage for a period of one year and against order dated 12.10.2020 passed by

respondent No. 4 whereby her departmental representation/appeal has been rejected.

2. According to the appeal, respondent No. 4 initiated disciplinary proceedings against the appellant and issued charge sheet and statement of allegations as well as show cause notice, which were duly replied by the appellant. Respondent No.2 passed an order/notification dated 15.11.2019 vide which major punishment of reduction to lower pay stage for a period of one year has been passed against the appellant without collecting any evidence against her. The appellant filed departmental appeal/representation on 13.12.2019, which was rejected on 12.10.2020, hence, the present appeal on 05.11.2020.

3. On receipt of the appeal and its admission to full hearing, the respondents were directed to file reply/comments, which they did. In their reply it was submitted that a complaint was received from NAB, alleging embezzlement of repair budget against the appellant. The respondent department conducted departmental enquiry against the appellant and the department agreed to the findings/ recommendations of the enquiry officer and awarded major penalty of one step reduction to a lower post/pay scale as prescribed in the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011; that the charges levelled against the appellant were tenable and liable to be maintained in the eyes of law; that the competent authority afforded opportunity of personal hearing to the appellant.

4. Counsel for the appellant submitted that there was no misconduct on the part of the appellant and she was wrongly awarded the punishment by way of impugned order; that the appellant had discharged her official duties

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vigilantly and no complaint of the alleged act for which the appellant was penalized, was made against her that she could take to any action.

5. Conversely the other learned AAG for the respondents maintained the stance taken by the respondents in their reply and prayed for dismissal of the appeal.

6. The appellant has been awarded penalty of reduction to lower pay stage for a period of one year vide notification No.SO(S/F)E&SED/4-17/2017/Misue/PTC/Funds/Lakki Marwat dated 15.11.2019. Initially allegations against her in the charge sheet were that she being responsible officer violated the rules in the utilization of PTC Funds and transferred a huge amount of Rs.10,23,000/- to the PTC account of GGPS Dalwati No. 1 and GGPS Dalwati No. 2 UC Dara Tangi Lakki Marwat and she paid Rs. 10,23,000/- in lump-sum to the Chowkidar of GGPS Dalwati No. 1 and GGPS Dalwati No. 2 for further utilization in violation of rules of PTC Funds, due to which the funds had not been properly utilized. Enquiry was ordered to be conducted against the appellant. The appellant submitted reply to the charge sheet wherein she in paragraph 12 contended as under:-

"That the undersigned was busy in hundred of court cases in various courts, settlement of IDPs problems, different meetings with different authorities and could not visit all the schools among which the above cited schools were also included, as it was a very far flung area while so many other schools were visited which were either satisfactory or instructions were issued on the spot to the Head Teachers. In the mean while the undersigned was transferred from District Lakki Marwat to District Bannu on 14.09.2015 and left the charge on 17.09.2015."

7. The above contention of the appellant is an admission that she had not paid visit to the schools under her administrative control. The appellant had

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properly been associated in the enquiry and her statement was recorded. Before the enquiry committee, she had stated that the DEO had to spare 16 days in a month for schools inspections but she had not visited Galwati No. 1 and 2 throughout her 15 month's tenure due to multifarious responsibilities/ engagements. No supporting material was placed on record in this respect. This shows that the appellant had never visited the schools under her control during her entire tenure. The admission of the appellant and the findings of enquiry show that the appellant had been found guilty of negligence in performance of her duties. So she was very appropriately awarded the punishment vide the impugned notification. The grounds urged in the appeal are not convincing nor appear to be sound to show that the appellant was not treated in accordance with the law.

8. This appeal, in the above circumstances, seems groundless and is dismissed. Consign.

9. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 21st day of April, 2022.*



(KALIM ARSHAD KHAN)
Chairman

(MIAN MUHAMMAD)
Member (E)

SA 14047/20

21st April, 2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the respondents present. Arguments heard and record perused.

2. Vide our detailed judgment of today, containing 04 pages, the appeal is dismissed. Consign.

4. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 21st day of April, 2022.*



(KALIM ARSHAD KHAN)

Chairman



(MIAN MUHAMMAD)

Member (E)

14047/20

02.06.2021

Counsel for the appellant and Noor Zaman Khattak, District Attorney alongwith Saleem S.O for the respondents present.


Written reply/comments submitted by the respondents.
The appeal is assigned to D.B for arguments on 11.10.2021.

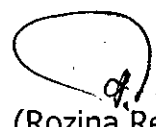

Chairman

11.10.2021

Clerk to counsel for the appellant present. Mr. Kabirullah Khattak Additional Advocate General for the respondents present.

Learned Members of the DBA are observing Sogh over the demise of Dr. Abdul Qadeer Khan (Scientist) and in this regard request for adjournment was made; allowed. To come up for arguments on 06.01.2022 before D.B.



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


(Rozina Rehman)
Member (J)

06.01.2022

Clerk to counsel for the appellant present. Mr. Asif Masood Ali Shah, DDA for the respondents present.

Clerk to counsel for the appellant requested for adjournment on the ground that his counsel is not available today, due to general strike of the bar. Adjourned. To come up for arguments before the D.B on 21.04.2022.


(Atiq-ur-Rehman Wazir)
Member(E)


Chairman

28.12.2020

Mr. Shahid Qayum Khattak, Advocate, for appellant is present.

The abridgement of what has been agitated at the bar by the learned counsel representing appellant is that in consequence of initiation of disciplinary proceedings, followed by issuance of show-cause notice, was duly replied but even then the Secretary Elementary & Secondary Education Department Government of Khyber Pakhtunkhwa Peshawar passed impugned order dated 15.11.2019 vide which major punishment of reduction to lower pay stage for a period of one year. Departmental appeal was moved which did not yield fruitful result hence, the present appeal.

The points so agitated at the bar need consideration. The appeal is admitted for regular hearing subject to all just legal exceptions. Appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 22.03.2021 before S.B.

Appellant Deposited
Security & Process Fee

(MUHAMMAD JAMAL KHAN)
MEMBER

22.03.2021

Mr. Noor Zaman, husband of the appellant, on behalf of the appellant present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Syed Naseer-ud-Din, Assistant for the respondents present and requested for further time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 02.06.2021 before S.B.


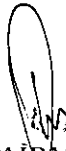
(SALAH-UD-DIN)
MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 14047 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/11/2020	<p>The appeal of Mst. Bibi Razia presented today by Mr. Shahid Qayyum Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/12/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. /2020

Bibi Razia Appellant

Versus

Director E & SE Department and others Respondents

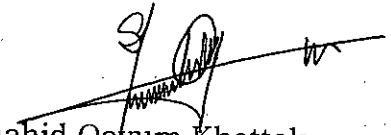
INDEX

S.No.	Description of Documents	Annex	Pages
1.	Memo of appeal with affidavit		1-4
2.	Address of the parties		5
3.	Copy of Charge Sheet and Reply	A- A-I	6-11
4.	Copy of SCN & Reply	B- B-I	12-14
5.	Copy of Impugned order dated 15/11/2019	C	15
6.	Copy of Departmental Appeal	D	16-18
7.	Copy of impugned order dated 12/10/2020	E	19
8.	Copy of other documents		20-22
9	Wakalat Nama		23



Appellant

Through



Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan
Mob.No. 0333-9195776

Dated: 05 /11/2020

①

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 14047/2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14225

Dated 05/11/2020

Bibi Razia W/o Noor Zaman R/o Toppi Kala,

Teh Tehti-e-Nasrati District Karak Appellant

Versus

1. Director E & SE Department, Government of Khyber Pakhtunkhwa, Peshawar
2. Secretary E & SE Department, Government of Khyber Pakhtunkhwa, Peshawar
3. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar
4. Chief Minister, Government of Khyber Pakhtunkhwa, Peshawar
..... Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 15/11/2019 PASSED BY RESPONDENT NO. 3 BY WHICH THE APPELLANT HAS BEEN AWARDED MAJOR PENALTY OF REDUCTION TO LOWER PAY STAGE FOR A PERIOD OF ONE YEAR AND AGAINST THE ORDER DATED 12/10/2020 PASSED BY RESPONDENT NO. 4 VIDE WHICH THE DEPARTMENTAL REPRESENTATION/ APPEAL FILED BY APPELLANT HAS BEEN REJECTED

PRAYER

On accepting this service appeal, the impugned orders dated 15/11/2019 and order dated 12/10/2020 may graciously be set aside by declaring it illegal, unlawful, without authority, based on malafide, void abinitio and thus not sustainable in the eyes of law and appellant is entitled for reinstatement in service with all back benefits of pay and service

Respectfully Sheweth;

1. That Respondent No. 4 initiated disciplinary proceedings against appellant and issued charge sheet and statement of allegations which was properly replied.

Filed to-day
14/11/2020
Registrar
05/11/2020

(Copy attached as Annexure "A" & "A-I")

3. That thereafter show cause notice has been issued to the appellant which was also properly replied by appellant. (Copy attached as Annexure "B" & "B-I")
4. That respondent No. 2 passed an order/ notification dated 15/11/2019 vide which the major punishment of reduction to lower pay stage for a period of one year has been passed against appellant without collecting any evidence against her. (Copy of impugned order is attached as Annexure "C")
5. That appellant filed departmental appeal /representation (the facts and grounds agitated therein may please be treated part and parcel of this appeal) against the impugned order before respondent No. 4 on 13/12/2019 who vide order dated 12/10/2020 rejected the same without complying codal formalities. (Copy of appeal and impugned order are attached as Annexure "D" and "E")
6. That now appellant feeling aggrieved from the above orders hence, filling this appeal on the following amongst other grounds inter alia

GROUND:

- a. That both the impugned orders of the respondents are illegal, unlawful, without authority, based on malafide intention, against the nature justice, violative of the Constitution and Service Law and equally without jurisdiction, hence the same is liable to be set aside in the best interest of justice.
- b. That both the impugned orders passed by respondent are very much harsh, without any evidence based on surmises & conjectures and is equally against the principle of natural justice.
- c. That during enquiry proceedings none from the general public was examined in support of the charges leveled against appellant nor proper opportunity of hearing has been provided to appellant. Neither allegations mentioned above are practiced by the appellant nor proved against him through any cogent reason or evidence.

- d. That appellant from the very begging objected on the bias preliminary enquiry proceedings but nobody bother to change the enquiry officer and the second enquiry was the ditto copy of the preliminary enquiry and have not collected any evidence of its own which vitiated the whole proceedings and clearly show biasness with appellant.
- e. That the inquiry officer failed to collect any evidence in support of the charges. No one was examined as witness in presence of appellant nor appellant was confronted with any documentary or other kind of evidence on the basis of which the impugned order was passed.
- f. That the biasness of the respondents are very much proved from the fact that while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & 1991 PLC 584.
- g. That while awarding the impugned order the respondent not bother to take that appellant is an honest and dedicated and leave no stone unturned to discharge his duties.
- h. That due to this illegal act the appellant has been vexed thrice for the same offence, her promotion case was deferred, her cadre has also been changed which show clear malafide on the part of respondents.
- i. That the impugned order has been passed in violation of law and rules of disciplinary proceedings and principles of natural justice. The authority wrongly and malafidly based the impugned orders without giving any reason with proof whatsoever, therefore the impugned order is bad in law.
- j. That respondent No. 4 has not decided the departmental appeal /representation in according to the rules and regulations which clearly shows malafide intention thus, has no sanctity in the eyes of law thus the act of respondents are totally based on malafide intention which clearly shows discrimination and undue victimization.

(4)

- k. That the appellate authority has not provided any personal hearing opportunity to the appellant nor the order passed is speaking one.

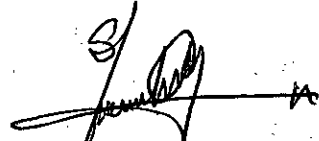
It is, therefore, most humbly prayed that on accepting this service appeal, the impugned orders dated 15/11/2019 and order dated 12/10/2020 may graciously be set aside by declaring it illegal, unlawful, without authority, based on malafide, void abinitio, and thus not sustainable in the eyes of law and appellant is entitled for all back benefits of pay and service.

Any other relief not specifically prayed for but deems appropriate in the circumstances of the case may also be granted.



Appellant

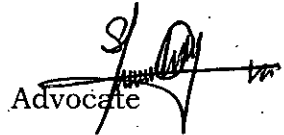
Through



Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

Dated: 05 /11/2020

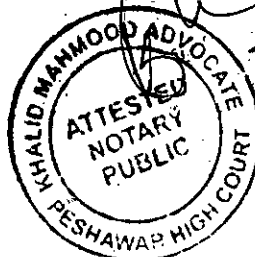
Certified that as per instruction of my client no such appeal has been filed before this Hon'ble Forum.



Advocate

AFFIDAVIT

I, Bibi Razia W/o Noor Zaman R/o Toppi Kala, Teh Tehti-e-Nasrati District Karak, do hereby solemnly affirm and declare on Oath that the contents of the above appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Tribunal.



Deponent

5

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. /2020

Bibi Razia Appellant

Versus

Director E & SE Department and others Respondents

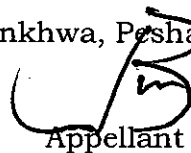
ADDRESSES OF THE PARTIES

APPELLANT

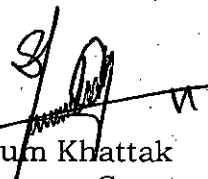
Bibi Razia W/o Noor Zaman R/o Toppi Kala,
Teh Tehti-e-Nasrati Disrtict Karak

RESPONDENTS

1. Director E & SE Department, Government of Khyber Pakhtunkhwa, Peshawar
2. Secretary E & SE Department, Government of Khyber Pakhtunkhwa, Peshawar
3. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar
4. Chief Minister, Government of Khyber Pakhtunkhwa, Peshawar


Appellant

Through


Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

Dated: 05 /11/2020

(6)

Annexure - A

REGISTERED



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the November 22nd, 2017

OFFICE ORDER

No. SO(S/F)E.&SED/4-17/2017/Disciplinary Action/Lakki: The Competent Authority is pleased to constitute Inquiry Committee comprising of the following officers to conduct formal inquiry against Mst. Bibi Razia (BS-18) Ex-DEO (F) Lakki Marwat now Principal GGHSS Chokara Karak, Mst. Shahana (BS-17) Ex-SDEO (F) Lakki Marwat now SDEO (F) Tank, Mst. Khurshid Begum (BS-15) PSHT/ Secretary of PTC GGPS Dalwati No. 1 Lakki Marwat and Mst. Zeenat Bibi (BS-15) PSHT/ Secretary of PTC GGPS Dalwati No. 2 Lakki Marwat on account of allegations mentioned in the charge sheet/ statement of allegations:

- i. Mr. Tasleem Khan (PMS-BS-19),
Additional Secretary, Housing Department
- ii. Mst. Salma Akhtar,
Principal (BS-19) GGHSS Badaber Peshawar

The Inquiry Committee shall submit recommendations/ report to the Competent Authority within fifteen (15) days positively (Copies of charge sheet/ statement of allegations are enclosed).

SECRETARY

Encl: of even No. & date:

Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar (Copies of charge sheet/ statement of allegations are enclosed).
2. Mr. Tasleem Khan (PMS-BS-19) Inquiry Officer/ Additional Secretary, Housing Department (Copies of charge sheet/ statement of allegations are enclosed).
3. Mst. Salma Akhtar, Inquiry Officer/ Principal (BS-19) GGHSS Badaber Peshawar (Copies of charge sheet/ statement of allegations are enclosed).
4. Mst. Bibi Razia (BS-18) Accused/ Ex-DEO (F) Lakki Marwat now Principal GGHSS Chokara Karak (Copies of charge sheet/ statement of allegations are enclosed).
5. Mst. Shahana (BS-17) Accused/ Ex-SDEO (F) Lakki Marwat now SDEO (F) Tank (Copies of charge sheet/ statement of allegations are enclosed).
6. Mst. Khurshid Begum (BS-15) Accused/ PSHT/ Secretary of PTC GGPS Dalwati No. 1 Lakki Marwat (Copies of charge sheet/ statement of allegations are enclosed).
7. Mst. Zeenat Bibi (BS-15) Accused/ PSHT/ Secretary of PTC GGPS Dalwati No. 2 Lakki Marwat (Copies of charge sheet/ statement of allegations are enclosed).
8. District Education Officers (Female) Karak & Lakki Marwat.
9. PS to Secretary, E&SE Department.
10. Master File.

Encl: as above:

(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)

(7)

CHARGE SHEET

I, **Parveez Khattak, Chief Minister Khyber Pakhtunkhwa**, as Competent Authority, hereby charge you **Mst. Razia Khattak (BS-18) Ex-DEO (Female) Lakki Marwat** now **Principal GGHSS Chokara Karak**, as follows: -

That you while posted as **District Education Officer (Female) Lakki Marwat** committed the following irregularities:

- i. You being responsible officer violated the rules in the utilization of PTC Funds and transferred a huge amount of Rs. 10, 23, 000/- to the PTC account of GGPS Dalwati No. 1 and GGPS Dalwati No. 2 UC Dara Tangi Lakki Marwat.
- ii. You have paid Rs. 10, 23, 000/- in lump-sum to the Chowkidar of GGPS Dalwati No. 1 and GGPS Dalwati No. 2 for further utilization in violation of rules of PTC funds, due to which the funds has not been properly utilized.

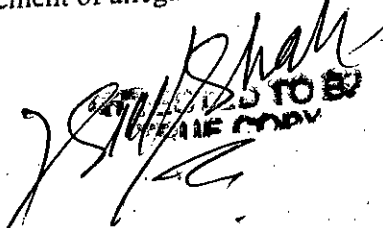
2. By reasons of the above, you appear inefficient under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule-4 of the rules ibid.

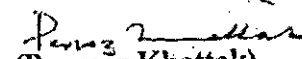
3. You are, therefore, required to submit your written defense within seven days of the receipt of this Charge Sheet to the Inquiry Officer/ Inquiry Committee, as the case may be.

4. Your written defense, if any, should reach the Inquiry Officer/ Inquiry Committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

5. Intimate whether you desire to be heard in person.

6. A statement of allegations is enclosed.


Mst. Razia Khattak (BS-18),
Ex-DEO (Female) Lakki Marwat,
Now Principal GGHSS Chokara Karak


(Parveez Khattak)
Chief Minister
Khyber Pakhtunkhwa

DISCIPLINARY ACTION

1. Parveez Khattak, Chief Minister Khyber Pakhtunkhwa, as Competent Authority, am of the opinion that *Mst. Razia Khattak (BS-18) Ex-DEO (Female) Lakki Marwat* now Principal GGHSS Chokara Karak, has rendered herself liable to be proceeded within the meaning of rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, as she has committed the following acts/ omissions: -

STATEMENT OF ALLEGATIONS

- i. She being responsible officer violated the rules in the utilization of PTC Funds and transferred a huge amount of Rs. 10, 23, 000/- to the PTC account of GGPS Dalwati No. 1 and GGPS Dalwati No. 2 UC Dara Tangi Lakki Marwat.
- ii. She has paid Rs. 10, 23, 000/- in lump-sum to the Chowkidar of GGPS Dalwati No. 1 and GGPS Dalwati No. 2 for further utilization in violation of rules of PTC funds, due to which the funds has not been properly utilized.

2. For the purpose of inquiry against the said accused with reference to the above allegations, an Inquiry Officer/ Inquiry Committee, consisting of the following, is constituted under rules-10 (I) (a) of the rules ibid: -

- 1. *Mr. Tahir Khan (PMS BS-15), AS Housing Deptt.*
- 2. *Mst. Salma Akhtar, Principal (BS-18), GGHSS Badaber Peshawar*

3. The Inquiry Officer/ Inquiry Committee shall, in accordance with the provisions of the rules ibid, provide reasonable opportunity of hearing to the accused, record its finding and make, within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the Inquiry Officer/ Inquiry Committee.

**Mst. Razia Khattak (BS-18),
Ex-DEO (Female) Lakki Marwat,
Now Principal GGHSS Chokara Karak
(Accused)**

Parveez Khattak
**(Parveez Khattak)
Chief Minister
Khyber Pakhtunkhwa**

⑨

Annexure "A-1"

From

BIBI RAZIA
Ex-DEO (F) Lakki Marwat
Now Principal GGHSS Chokara Karak

To,

Mr. Tasleem Khan (PMS-BS-19)
Additional Secretary Housing Department
Govt: of Khyber Pakhtunkhwa Peshawar

Subject: - REPLY TO CHARGE SHEET

Respected Sir,

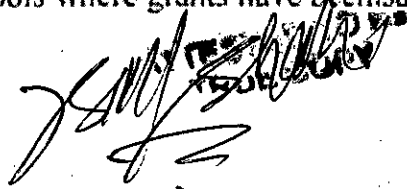
Reference office order of the Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar No. SO (S/F) E & SED / 4-17/2017/ Disciplinary Action / Lakki dated Peshawar the November 22nd, 2017.

The under signed hereby submit her reply with the request that the undersigned has not violated the rules in the utilization of PARENT TEACHER COUNCIL funds amounting to Rs. 10,23000/- for GGPS Daulati No. I & GGPS Daulati No. II U.C Dara Tang, Lakki Marwat for the following reasons.

1. That before going into the further replies the under signed points out that no preliminary Inquiry in this connection has been made by any officer and the undersigned has neither submitted any reply nor interrogated by any preliminary inquiry officer. As Mr. Saleem Khan Principal Govt: Shaheed Sher Nawaz centennial model high school No. 1 Tank was appointed as Preliminary inquiry officer in this regard whom the undersigned objected vide the undersigned letter No. 1413 dated 17/12/2016 due to the reason pointed out in the said letter. (Photocopy attached as Annexure - A.)
2. That the said preliminary inquiry officer has submitted his one sided & biased report without the undersigned's reply etc.
3. That the undersigned took over charge as DEO (F) Lakki Marwat in May 2014. During these days there were huge crisis of the settlement of the IDPs, visiting the schools which were damaged by the flood and activities of the bye election (National Assembly).

Due to the above reason the undersigned was badly involved & busy in the meetings with Deputy Commissioner Lakki Marwat, Assistant Commissioner Lakki Marwat, Divisional Election Commissioner, District Election Commissioner, Returning Officers. So the undersigned was unable to concentrate on the works of the PARENT TEACHER COUNCIL funds.

4. The undersigned issued different orders to the Subordinate Officers to visit & check the schools where grants have been sanctioned, the letters will be present on office files.



5. That the undersigned had issued strict instructions to all Head Mistresses/SDEO/ADEO,S that the work may be carried out by the parent teachers council not by the chowkidars etc. (Phycopy attached as annexure -B)
6. That the PARENT TEACHER COUNCIL funds are directly received from secretariat / Directorate on the reports of IMU officials / officers & the DEOs / SDEOs have no part in the sanction of these amounts. The list of the schools alongwith its code No. & PARENT TEACHER COUNCIL account No's are received from high ups and the DEOs / SDEOs are only responsible to write a letter to District Account Officers to pass cheques and transfer the amount in the PARENT TEACHER-COUNCIL accounts of concerned schools.(Phycopy Attached as annexure-C)
7. During the year 2014-15 amount of school improvement plan Rs. 2,00,000/- for GGPS Daulati No. 1 and Rs 2,00,000/- for GGPS Daulati No. 2 were transferred into the PARENT TEACHER COUNCIL accounts of concerned schools for security measure by the then SDEO (F) Lakki Marwat vide her letter No. 137 dated 10/02/2015 as the grant was allotted in her designated account and code. (Photocopy attached as Annexure -D)
8. That Rs. 6,63,600/- and Rs. 1,60,000/- were transferred for raising of boundary wall and group Latrine for both the schools by the undersigned as per sanction of the higher authorities. (Photocopy attached as Annexure - E&F)
9. That the undersigned has never transferred the PTC funds to the chowkidar of any school but transferred to the PARENT-TEACHER-COUNCIL-accounts of the school which is a joint account of chair person and secretary-(Head Teacher).(Please see Annexure-E&F at serial.No. 26,27 and 47, 72.
10. The amount was utilized by the PARENT TEACHER COUNCIL under the chairman ship of chair person and secretary of PARENT TEACHER COUNCIL as per PARENT TEACHER COUNCIL rules. The PARENT TEACHER COUNCIL chairperson is authorized to utilize amount up to thirty lac. (Photocopy attached as Annexure -G)
11. That the undersigned has nothing in the utilization of amount except that to visit the school and check the work by herself or through subordinate officers i-e SDEO, ADEO, ASDEO ect. Nothing adverse was received in my office against these two schools.
12. That the undersigned was busy in hundred of court cases in various courts, settlement of IDPs problems, different meetings with different authorities and could not visit all the school among which the above cited schools were also included, as it was a very far flung area while so many other schools were visited which were either satisfactory or instructions were issued on the spot to the Head Teachers. In the mean while the undersigned was transferred from District Lakki Marwat to District Bahnu on 14/09/2015 and left the charge on 17/09/2015.

[Handwritten Signature]
ATTESSED TRUE COPY

(11)

Therefore It is requested to kindly keep in view the Female Gender, the busy life of DEO while the undersigned was Deputy DEO along with additional charge of DEO (F), and struggle for the betterment of the department in a problematic District Lakki Marwat where hundreds of court cases and enquiries were in process due to irregular appointments by Ex-EDO Noor Hasan Khan.

It is requested that I have neither violated the rules nor neglected my job, so, I may be kindly Exonerated.

Note: I desire to be heard in person

- Sd -
BIBI RAZIA
Ex-DEO (F) Lakki
Marwat
Now Principal GGHSS
Chokara (Karak)

Endst: No. 1552-55 Dated 04/12/2017
Copy forwarded to

- Mst Salma Akhtar Principal (BPS-19) GGHSS Badaber Peshawar
- PS to Secretary E & SE Department Khyber Pakhtunkhwa Pwshawar
- Section Officer schools (F) E & SE Department Khyber Pakhtunkhwa Pwshawar
- Director E & SE Khyber Pakhtunkhwa Pwshawar

[Handwritten Signature]
Ks

**TESTED TO BE
TRUE COPY**

[Handwritten Signature]
BIBI RAZIA
Ex-DEO (F) Lakki
Marwat
Now Principal GGHSS
Chokara (Karak)

(12)

Annexure "B"

SHOW CAUSE NOTICE

I, **Mehmood Khan, Chief Minister Khyber Pakhtunkhwa**, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, **Mst. Bibi Razia (BS-18) Ex-DEO (F) Lakki Marwat now Principal GGHSS Chokara Karak**, as follows:

- a. You being head of the department failed to perform your administrative, supervisory, financial and monitoring powers by transferring PTC funds to the concerned school without any follow-up/ supervision.

I am satisfied that you have committed the act of "Miss-conduct/ In-efficiency" as specified in Rule-3 of the said rules.

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

3. As a result, thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty(s) under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

- i. Reduction to lower post for a period of 01-year.
- ii. _____

4. You are, thereof, required to show cause as to why the aforesaid penalty/ penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

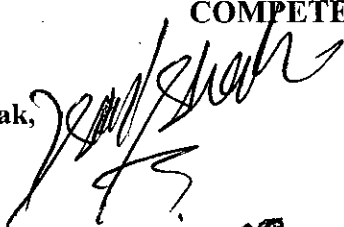
5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, in the normal circumstances, it shall be presumed that you have no defense to put in, and in that case an ex-parte action shall be taken against you.

6. A copy of the findings of the fact-finding inquiry is enclosed.



**(MEHMOOD KHAN)
CHIEF MINISTER KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY**

**Mst. Bibi Razia (BS-18),
Ex-DEO (F) Lakki Marwat,
Now Principal GGHSS Chokara Karak,
(Accused)**



**TESTED TO BE
TRUE COPY**

(13)

To,

The secretary
Elementary & Secondary Education Department
Government of Khyber Pakhunkhwa Peshawar

Subject: - REPLY FOR SHOW CAUSE NOTICE

Respected Sir,

Reference your office letter No. SO (S/F) E & SED/4-17/2017
Disciplinary Action / Lakki dated Peshawar the October 26th 2018.

I very humbly request as under: -

1. That the undersigned has not committed any act of Miss Conduct / in efficiency as specified in rule-3 of E & D Rules 2011.
2. That Minor penalty of removing from the post of DEO for 03 years has already been imposed upon the undersigned due to the above inquiry and again issue of show cause for the same inquiry is against the justice. (Copy attached as annexure "A").
3. That as the preliminary inquiry submitted by one Salim Khan Principal GCMHS Tank was submitted without interrogating or listening the undersigned due to his previous biases with the undersigned. My reservations regarding his biases were submitted to the higher authorities. (Copy attached as Annexure "B"). However he submitted Ex. party inquiry which is against the rules.

That the undersigned took over charge as DEO (F) Lakki Marwat in May 2014 while there the crises of the settlement of IDPs in different schools. Lakki Marwat was also flood affected area during 2014. I have to run about in different meetings with District administration and high ups to settle the problems of IDPs and flood. Furthermore due to hundreds of irregular appointments by one Ex. EDO Lakki Marwat Mr. Noor Hassan Khan, Hundreds of courts cases, NAB attendances, Responses and Correspondence were faced during my stay at Lakki Marwat District while I was Dy. DEO with additional charge of DEO.

In the meanwhile PTC amounts were issued to the schools directly by the Secretariat of E&SE Department on the reports and demands of IMU. The amounts were not distributed by the undersigned.

However the undersigned issued instructions to the subordinate officers i.e. SDEO, ASDEO, ADEO, Headmistress to carry out the work strictly according to the rules, specifications through PTC and if any deficiency found may be reported to the undersigned. (Copy attached as Annexure "C").

[Handwritten Signature]

ATTESTED TO BE
TRUE COPY

[Handwritten notes and scribbles on the left margin]

14

- 7. That No adverse reports was received to the undersigned regarding GGPS Daulati No 1 & 2 while the undersigned was transferred from Lakki Marwat to District Bannu in September 2015.
- 8. That the undersigned has never transferred any amount to the account of chowkidar but to the Account of PTC of the school on the name of Headmistress & PTC chairperson. The work was carried out by PTC chairperson and members not by the undersigned.
- 9. As for supervision, I visited several Schools, attended hundreds of courts cases, different meetings, held Departmental Promotions and selections committees meetings, settled the IDPs and then vacated the schools from IDPs and several other business and it was impossible for the undersigned to visit each and every school of the District.

Sir,

I have performed my duty honestly and have faced great hardships at Lakki Marwat. I am a woman and have many limitations and bars to travel in dangerous areas which I have done to the best of my capabilities.

So, I very humbly request you to kindly exonerate me and oblige.

Note: - I desire to be heard in person.

Thanks

Bibi Razia

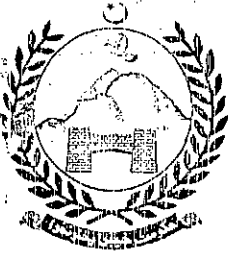
Yours obediently

BIBI RAZIA
Ex. DEO (F) Lakki Marwat
Now Principal GGHSS Chokara
(Karak)

TESTED TO BE TRUE COPY

Principal GGHSS Chokara
(KARAK)

09/11/2018



(15)

Annexure "C"

GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the November 15th, 2019

NOTIFICATION

No. SO(S/F)E&SED/4-17/2017/Misuse/PTC/Funds/Lakki Marwat: WHEREAS Mst. Bibi Razia (MC-BS-18) Ex-DEO (F) Lakki Marwat now DDEO (F) with additional charge of DEO (F) Bunir, was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, for the charges mentioned in the charge sheet and statement of allegations.

2. AND WHEREAS inquiry committee comprising Mr. Tasleem Khan (PMS-BS-19) Additional Secretary, Housing Department and Mst. Salma Akhtar, Principal (BS-19) GGHSS Badaber Peshawar conducted formal inquiry against the accused for the charges leveled against her in accordance with the rules and submitted its report.

3. AND WHEREAS inquiry committee comprising of Internal Audit Officer, Internal Audit Cell, E&SED & Engineer Taj, M&E Officer, Planning Cell E&SED conducted special audit regarding misuse of PTC Funds.

4. AND WHEREAS Major penalty of "reduction to lower post for a period of one (01) year" was tentatively imposed vide show cause notice served upon her by the Competent Authority (Chief Minister, Khyber Pakhtunkhwa).

5. AND WHEREAS the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after having considered the charges and evidence on record, inquiry report, explanation of the accused in response to the charge sheet/ statement of allegations/ show cause notice and personal hearing granted by Mr. Zakaullah Khattak, Secretary Law Department Khyber Pakhtunkhwa on behalf of Competent Authority (Chief Minister) on 14-02-2019. is of the view that the charge against her have been proved.

6. NOW, THEREFORE, in exercise of the powers conferred under Rule-14 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister) is pleased to confirm the Major penalty of "reduction to lower pay stage for a period of one (01) year" upon Mst. Bibi Razia (MC-BS-18) Ex-DEO (F) Lakki Marwat now DDEO (F) with additional charge of DEO (F) Bunir. with immediate effect.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Endst: of Even No. & Date:

Copy forwarded to the:

- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- District Education Officers (Female) Lakki Marwat & Bunir.
- District Account Officers Lakki Marwat & Bunir.
- Mst. Bibi Razia (MC-BS-18) Ex-DEO (F) Lakki Marwat now DDEO (F) with additional charge of DEO (F) Bunir.
- PS to Secretary, E&SE Department, Peshawar.
- Office order file.

ATTEST TO BE
TRUE COPY

AKASHA KIRAN
15/11/19

(AKASHA KIRAN)
Section Officer (Schools Female)

To,

The Chief Minister,
Government of Khyber Pukhtunkhwa,
Peshawar.
(Appellate Authority)

Through:

PROPER CHANNEL.

Subject:

DEPARTMENTAL APPEAL AGAINST THE PENALTY IMPOSED
ON THE APPELLANT VIDE SECRETARY ELEMENTARY AND
SECONDARY EDUCATION DEPARTMENT NOTIFICATION NO.
SO(S/F) E&SED/4-17/2017/Misuse/PTC/Funds/Lakki Marwat Dated
Peshawar the November 15th, 2019

Respected sir,

With due regards it is stated that punishment of "reduction to lower pay stage for a period of one (01) year" had been imposed on the undersigned vide department of Elementary and Secondary Education Government of Khyber PakhtunKhwā Notification NO. SO(S/F) E&SED/4-17/2017/Misuse/PTC/Funds/Lakki Marwat Dated Peshawar the November 15th, 2019 on the basis of an enquiry regarding misuse of PTC funds during the year 2015 as Ex-DDEO/IC DEO (F) Lakki Marwat (**Annexure-I**) while in the same case the undersigned was punished as removing from management seat for three years vide Notification of E & SED No SO(S/F) E&SED/4-17/2017/MST Razia Khattak/Ex-DEO Lakki Marwat Dated Peshawar the February 15th, 2018 (Annexure-II). Furthermore due to the same enquiry I was deferred from promotion to BPS 19 in the PSB held on May 17th, 2019 while my other badge mates were promoted to BPS 19 on May 17th, 2019. It is also pointed out that one Miss Shahana Yasmeen Ex-SDEO (F) Lakki Marwat who was also punished in the same case in same nature has already been promoted from BPS 17 to BPS 18. (**Annexure III**) and I am suffering for the last more than three years. The appellant remained DDEO, Lakki Marwat with Additional charge of DEO (Female) Lakki Marwat with effect from 25/05/2014 to 17/09/2015. During this period one year three month and twenty two days, the appellant remained over worked, awfully busy in various emergent situations besides the routine functions/work of the senior posts of DDEO & DEO (Female), which by itself were arduous in nature and heavy in quantity.

The emergent/extra responsibilities laid down on the appellant were to settle the:-

- Problems of adjustment of IPD's in various schools, to handle the devastating effects of floods in many schools and to handle NAB issues and court matters pertaining to the wrongs done by Mr. Noor Hassan Khan, Ex-EDO (Education) Lakki Marwat in connection with illegal appointments and;
- To make arrangements in connection with local government elections and by-elections of MNA seat and as such it was about impossible to visit all schools personally.
- As far as the PTC funds is concerned, the same are demanded by the IMU (Independent Monitoring Unit) on need basis directly and not through the office of the DEO. The funds demanded by the IMU are allocated on schools basis by the Provincial Government and send to the account of DEO or SDEO concerned.

[Handwritten Signature]
TRUST COPY

In the instant case the amount of Rs. 62,070,000 in connection with security measures for 391 schools was credited directly to the account of Mst. Shahana Yasmin, the then SDEO (Female) (Annexure-IV & V). She accordingly disbursed the same to these schools in February, 2015 including GGPS No. 1 & 2 of Dawlati @ Rs. 200,000/- each.

The remaining amount pertaining to Boundary walls, Group latrines and structural repair was credited to the account of DEO (Female) Lakki Marwat duly indicated in the list received from the Finance Department and Elementary and Secondary Education Department (Annexure-VI & VII) the said amount was also disbursed to the concerned schools through the concerned accounts of PTCs of all school enumerated in the aforementioned lists including the said two schools of Dawlati (Annexure-VIII & IX).

It may be pointed out once again that the funds allocated to the schools were demanded by the IMU (Independent Monitoring Unit) on need basis and allocated by the Provincial Government in the Finance Department and Elementary and Secondary Education Department. However, the amount is firstly credited to the office accounts of DEO and SDEO concerned and subsequently sent through the District Accounts Offices to the Schools concerned and credited to the accounts of PTCs.

Utilization of the said amount is the sole competency/authority of the PTCs (Parents Teachers Councils). The amount is drawn by the Chairperson and Secretary of the Council who are co-signatory for such drawl as per the "GUIDE for PTC" compiled by the Government which is self-contained and the DEO Office has no role in the utilization of the said fund. It may be mentioned that the said PTC funds are directly credited to the Council Accounts and not disbursed to individuals. The appellant in the capacity of DEO (Female) was not aware as how and through whom the amount is utilizing by the PTC. The chowkidar role in the case was not known to the appellant. It become in my knowledge during the enquiry proceedings that the chowkidar through whom the funds were utilized was son of the Chairperson concerned.

➤ In the instant case the amount in question was credited to the PTC in May, 2015 and the appellant was posted to District Bannu in September, 2015. As such it was impossible to suppose completion or on tracking the work by the PTC within three months. The disputes of utilizing the funds was came to light when I was DEO (Female) Bannu and enquiry commenced when the appellant was further transferred as Principal GGHSS Chokara Karak as such the appellant had not been made aware of the mishandling of the funds by the chairperson concerned through her son who was chowkidar in that school when I was DEO (Female) Lakki Marwat and cannot be held responsible for any irregularity as no one had reported this anomalous situation to me.

➤ It may further be mentioned that the preliminary enquiry was held by Mr. Salim Khan, Principal Government Shaheed Sher Nawaz Centennial Model High School Tank who had personal grudges with the appellant which fact was brought to the notice of the Director, Elementary and Secondary Education Peshawar through letter No. 1413, dated 17/12/2016 (Annexure-X) with the request to replace him but my request was not considered and as such his report was one sided and biased. Even the formal enquiry is a ditto copy of the said report of Mr. Salim Khan, as the Enquiry Committee never visited Office of DEO (Female) Lakki Marwat or the school concerned and hence the consequential mis-statement and the burden of others have been laid down on the shoulder of the appellant.

[Handwritten Signature]
TO BE
COPY

To sum up the issues:-

1. The amount of Rs. 1,023,000/- credited to the accounts of PTCs of GGPS No. 1 & 2 Dawlati was not specified by the appellant but by the Provincial Government itself. Under the existing "Guide for PTC", the PTCs is authorized to expend up to Rs. 3,000,000/- (thirty lacs) per annum (**Annexure-XI**).
2. The amount was not disbursed/handed over to the chowkidar by the appellant but by the Chairperson of the concerned PTC being mother of the chowkidar as DEO (Female) is not supposed to disburse PTC fund in cash but through the PTC Bank Account.
3. Self-contained instructions regarding undertaking the work in the schools and appropriately utilize the PTC Funds and vigilantly supervised. were issued vide Notification No. 713-1124, dated 27/02/2015 (**Annexure-XII**).

In view of the above, it is requested that the appellant, being innocent in the instant case may be absolved of the charges and may be exonerated and the penalty imposed upon the appellant may be set aside.

Thanking you in anticipation.

Yours Obediently

Dated: 13/12/2019

**ATTESTED TO BE
TRUE COPY**

(Bibi Razia)

Ex- DEO (Female) Lakki Marwat
Now Principal GGHSS Chokara Karak

(19)



GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(S/F)E&SED/4-17/2020/Mst. Bibi Razia
 Dated Peshawar the October 12th, 2020

To ✓

Mst. Bibi Razia,
 Ex-DEO Lakki Marwat,
 Now Principal GGHSS Chokara, Karak.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE PENALTY IMPOSED UPON
MST. BIBI RAZIA (BS-18) EX-DEO (F) LAKKI MARWAT NOW
PRINCIPAL GGHSS CHOKARA, KARAK & OTHERS.**

I am directed to refer to your appeal, dated 13.12.2019 on the subject and to inform that the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) has been pleased to regret your appeal, being without merits.

Yours faithfully,

A. Salam
 13/10/2020

(ABDUS SALAM)
 SECTION OFFICER (S/F)

Copy of the above forwarded to:

1. Director E&SE, Khyber Pakhtunkhwa, Peshawar.
2. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. PS to Chief Secretary, Khyber Pakhtunkhwa.
4. PS to Secretary E&SE, Department.
5. PA to DS (Admn) E&SE Department.

A. Salam

A. Salam
 13/10/2020

SECTION OFFICER (S/F)

**ATTESTED TO BE
 TRUE COPY**



PAKISTAN
1957

Dispatcher
Elementary & Senior
Govt. of Khyber Pakhtunkhwa
Civil Secretariat Peshawar

(20)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT

NOTIFICATION:-

It is hereby notified for the information of all concerned that conditional/special grants for the year 2015-16 has released and transferred to the concerned Banks in PTC accounts of GGPS/GCMS/GGMS/GGHS/GGHSS in Lakki District.

All Head Mistresses are directed to follow strictly the following instructions.

1. Amounts transferred in your Parent Teacher Council accounts may be utilized as soon as possible strictly according to specification sketch and laid down rules and regulations.
2. The work may be carried out by the parent Teacher Council not by Chowkidar or anybody else.
3. Photographs at various stages may be drawn and working papers vouchers etc may be kept in file, every time ready for checking by any inspection team/party.
4. The Head Mistresses of concerned school i.e Secretary PTC may keep vigilant eye on construction work and any deficiency may be reported immediately to this office. Material used in the works may be according to approved standard.

If any deficiency, use of below standard work was found/reported, then Head Mistresses will be held responsible and will be dealt under E&D rules 2011.

District Education Officer
(Female) Lakki Marwat.

Dated 27/02/2015

Endst:No. 713-1124

Copy to the:-

1. SDEO (Female) Lakki Marwat with the direction to have a vigilant eye upon the PTC work and immediately report any deficiency.
2. ADEO (P&D) Local Officer with the direction to have a vigilant eye upon the PTC work and immediately report any deficiency.

3-409 Head Mistresses all GGPS/GCMS/GGMS/GGHS/GGHSS/in Lakki District.

[Handwritten Signature]
**TESTED TO BE
TRUE COPY**

[Handwritten Signature]

District Education Officer
(Female) Lakki Marwat.

[Handwritten Mark]

From,

(21)

1-4

(Bibi Razia)

Ex District Educaiton Officer (Female) Lakki Marwat

Now Principal GGHSS Chokara (Karak)

No: 1413 Dated 17/12/2016

To,

Director Elementary & Secondary Education

Khyber Pakhtunkhwa Peshawar.

Subject:

REQUEST FOR CHANGE OF ENQUIRY OFFICER MR. SALIM KHAN PRINCIPAL GCMHS TANK.

Respected Sir,

Reference your office Endst: No:2761-65 and 2769-72 file complaints against Razia Khattak DEO (F) Lakki Marwat Dated: 25/11/2016 (Photocopies attached)

It is hereby stated for your kind information that during my tenure as DEO (F) Lakki Marwat, one Mr: Mir Ajab Khan was working as Head Clerk in my office. He demanded some irregular appointments which were denied by the undersigned. After some days my present enquiry officer Mr. Salim Khan Principal GCMHS Tank called me on my mobile Phone and also recommended Mr. Mir Ajab Khan to be favoured. But I was unable to favour Mr. Mir Ajab Khan for irregular appointments.

Mr. Mir Ajab Khan is the closed friend of Mr. Salim Khan. I was summoned by the enquiry officer Salim Khan in the office of DEO (F) Lakki Marwat on 17/12/2016 in connection with the present enquiry. I appeared before him on the said day and

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**TESTED TO BE
TRUE COPY**

venue, there Mr. Mir Ajab Khan was setting with him in connection with enquiry which disturbed me very much. So, I refused to give statement to a person who has been my subordinate Head Clerk.

Therefore it is, requested that my above said enquiries may be referred to some other officer in stead of Salim Khan Principal GCMHS Tank.

I am not ready to appear before Salim Khan in connection with any enquiry.

May my request be kindly honoured.

[Handwritten signature]

Yours truly

[Handwritten signature]

BIBI RAZIA

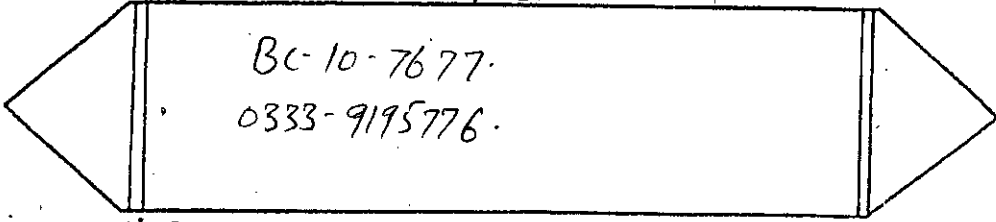
PRINCIPAL
G.G.H.S.S CHOKARA
(KARAK)

EX-DEO(F) Lakki Marwat.

Now Prncipal GGHSS Chokara Karak.

ATTESTED TO BE
TRUE COPY

بعدالت Services Tribunal Peshawar



BC-10-7677

0333-9195776

Appellant: 2 جناب

Director E&SE. بنام Bibi Razia

Deptt. KPK

موزخه
مقدمہ
دعویٰ
جرم

باعث تحریر آئینکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجواب دہی دکل کاروائی متعلقہ
 آج مقام پشاور کیلئے سید ابرار حسین نے سید ابرار حسین کے ساتھ اپنے کے
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

Acceptance

الرقوم 05 11 2020

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بمقام پشاور

بی بی رازیہ زویہ لغز زخان % ٹوٹی کلم حضرت لفظی صورت

CNIC: 14203-1998892-6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

S.A.# 14047/2020.

Bibi Razia BS-18 Ex-DEO (F) Lakki Marwat now Principal, GGHSS Chokara Karak.....**Appellant.**

VERSUS

Govt. of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa & others..... **Respondents**

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JOINT PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS

Respectfully Sheweth,

The Respondents submit as under:-

Preliminary Objections

1. The appellant has got no cause of action/locus standi.
2. The instant appeal is badly time barred.
3. The appellant has concealed the material facts from this Hon'able Tribunal, hence is liable to be dismissed on this score.
4. The appellant has not come to this Hon'able Tribunal with clean hands.
5. The appellant has filed the instant appeal with malafide intension just to pressurize the Respondent for gaining illegal service benefits.
6. The present appeal is liable to be dismissed fro mis-joinder & non joinder of necessary parties.
7. The instant appeal is against the prevailing law & rules.
8. The appellant is stopped by her own conduct to file the instant appeal.
9. The instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
10. That the order dated 15-11-2019 is legally competent and is liable to be maintained in favour of the Respondent.
11. That the appellant has been treated as per law, rules and discretionary powers conferred upon respondent No.1, under Section-10 of Civil Servant Act 1973.
12. That this Hon'able Tribunal has got no jurisdiction to entertain the instant service appeal, as Departmental Appeal has been filed by the Appellant barred by time as well as the Service Appeal.
13. That the appellant is not an aggrieved person under the relevant Article-212 of 1973 Constitution of Pakistan.

FACTS.

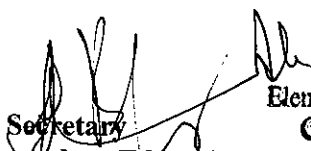
1. That a complaint was received from NAB, alleging embezzlement of repair budget against the appellant, whereby Director E&SE conducted a fact finding inquiry. The Department agrees to the findings/ recommendations of the inquiry officer and proposes formal inquiry under KP civil Servant (E&D) Rules, 2011 to be conducted against the appellant.
2. That the Competent Authority is pleased to appoint Mr. Tasleem Khan (PMS BS-19), Additional Secretary Housing Department and Mst. Salma Akhtar, Principal BS-19, GGSS Badaber Peshawar as Inquiry Officers to conduct fact finding inquiry into the matter.
3. As already explained in forgoing para.

4. That the inquiry committee submitted report, whereby recommended that the appellant namely Mst. Bibi Razia was found guilty as provided in grounds mentioned under Rule (3) of the Govt. of KP Civil Servant (Efficiency & Discipline) Rules 2011, and awarded major penalty of one step reduction to a lower post/pay scale as prescribed in KP Govt. Servant (Efficiency & Discipline) Rules 2011 under Section 4(a)1.
5. Incorrect and not admitted. That the impugned notification was issued on 15-11-2019 while the departmental appeal annexed with Service Appeal on 13-12-2019. which is badly time barred under the Service Tribunal Act, 1974.
6. Incorrect and not admitted. The penalty imposed upon the appellant is according to law, rules on the subject, natural justice, Acts, material on record, inquiry report, evidence on record and confession of the appellant, hence legal, lawful, by the lawful authority hence, tenable/maintainable in the eye of law. The present appeal is liable to be dismissed inter alia on the following grounds:-

Grounds

- a. Incorrect and not admitted. The appellant has been treated in accordance with law and no right of the appellant has been violated. Hence denied being a false and baseless and against the facts, record and inquiry proceedings.
- b. Incorrect as already explained in forgoing para, however the appellant has been provided full opportunity to defended himself during inquiry proceedings .
- c. Incorrect and not admitted. The Appellant proved to have committed the offence.
- d. Incorrect. The statement of the appellant in this para is false baseless, against the facts, record and inquiry report. In fact, proper proceedings were conducted against the appellant after obtaining approval of the Competent Authority.
- e. As replied in para-D above.
- f. Incorrect and not admitted. The statement of the appellant in this para is a mere concocted story. The allegations leveled against the appellant were detected by the inquiry officer.
- g. Incorrect and not admitted. The charges leveled against the appellant are based on fact which were proved within the meaning of law, thus the penalty imposed is tenable and liable to be maintained in the eye of law and justice. Hence this para is denied.
- h. Incorrect and not admitted. The appellant thus been treated in accordance with law and no right of the appellant has been violated, hence denied.
- i. As already explained in forgoing para.
- j. As already explained in forgoing para-05, that the departmental appeal of the appellant was badly time barred.
- k. Incorrect. That the Secretary Law Department provided personal hearing to the appellant on behalf of Competent Authority. Furthermore, that the instant service appeal is badly time barred, hence on this score the present service appeal is not maintainable under the KP Service Tribunal Act 1974.

In view of the above made submissions, it is, therefore, most humbly prayed that this Honourable Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the Respondents.


Secretary
Elementary & Secondary Education Department.

SECRETARY
Elementary and Secondary Education
Govt. of Khyber Pakhtunkhwa

ENQUIRY REPORT

GENERAL:

Background of the case is that the Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa vide Notification No.SO(S/F)E&SED/4-17/2017/Disciplinary action/Lakki: dated 22nd November 2017 notified Mr. Tasleem Khan (PMS-BPS-19) Additional Secretary Housing Department and Ms. Salma Akhtar (BPS-19) Principle, Government Girls Degree College, Badaber as Enquiry Committee to enquire into the alleged unlawful use of Parent Teacher Council (PTC) funds, as indicated in the charge sheet and statement of allegations, by the following officials of Elementary & Secondary Education Department:-

1. Ms. Bibi Razia Ex-DEO(F), District Lakki Marwat.
2. Ms. Shahana Yasmin, Ex-SDEO(F) Lakki Marwat.
3. Ms. Khurshid Begam, Head Mistress Government Girls Primary School Dalwati No.1, District Lakki Marwat.
4. Ms. Zeenat Bibi, (Rtd) Secretary PTC Government Girls Primary School Dalwati No.2, District Lakki Marwat.

The principle allegation was the lump-sum payment of PTC funds amounting to Rs-10,23,000 each to the Chowkidars of the schools (i.e. GGPS Dalwati No.1 and GGPS Dalwati No.2 district Lakki Marwat) **Annexure-A**

The concerned officials were asked to appear before the Enquiry Committee on 11th December, 2017 and to submit their written statements prior to the date fixed for hearing. **Annexure-B.**

On the date fixed, the Enquiry Committee recorded the statements of the accused officials respectively. Ms. Zeenat Bibi PSHT could not appear before the Committee and a reminder was issued to her directing her to appear before the Enquiry Committee on 18 December, 2017 **Annexure-C.** She did not appear before the Enquiry Committee, she was again summoned for 19-12-2017 and her statement recorded. The departmental representative in the instant case, Mr. Muhammad Ayub, Superintendent Establishment and Ms. Shabnam Shereen, Deputy Director (Establishment), Directorate of Elementary & Secondary Education Department joined the enquiry proceedings on 11-12-2017 and 19-12-2017 respectively. Certificates of attendance are annexed as **Annexure-D & E.**

PARTICULAR:

Ms. Bibi Razia, Ex-DEO(F) District Lakki Marwat.

While recording the statement on oath, Ms. Bibi Razia Ex-DEO(F) Lakki Marwat informed the Committee that she was serving the department since 17-05-1988 and served on Management Cader positions for about seven (7) years in Districts Karak, Dir, Bannu and

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Lakki Marwat. Her tenure as DEO(F) Lakki Marwat was from May 2014 to 14-09-2015. Copy of written statement as well as questionnaire are annexed as Annexures F & G.

When she was asked to brief the Committee about her responsibilities as DEO, she explained that matters pertaining to office routine business, meetings with schools management, attending cases in the courts of law and visiting schools come under the domain of District Education Officer.

When she was asked about the rationale and composition of Parent Teacher Council (PTC), she affirmed that she was fully aware of the importance of PTC and guidelines/rules regarding structure, functions and powers of PTC notified by Secretary, Elementary & Secondary Education Department vide notification dated 24th July 2013 (Annexure-H) and Finance Department notification No.BO-V/FD/3-10-2016-7 dated 09-06-2007 (Annexure-I)

When she was recalled about the transfer of fund amounting to Rs:10,23,000/- each to the PTC accounts of the two schools i.e. GGPS Dalwati No.1 and GGPS Dalwati No.2, she replied that she had only transferred the funds to the PTC accounts and had nothing to do with the utilization of the said funds.

When she was asked about the utilization of the PTC funds, Ms. Bibi Razia stated that according to the rules/TORs PTC funds can only be utilized by PTC itself through a Purchase Committee under the Chairperson and that she in her letter No.856 dated 28-02-2015 containing instructions inter-alia directed her subordinate staff that the funds must be used fairly and transparently. However, she was of the opinion that Chowkidar could utilize the funds of PTC if the PTC agreed thereto. She further stated that in her tenure nothing came into her knowledge regarding misuse of funds in GGPS Dalwati No. 1 and GGPS Dalwati No. 2.

On a query that how many days per month a DEO have to spare for field visits/inspection and whether she visited GGPS Dalwati No. 1 and GGPS Dalwati No.2, She replied that DEO has to spare 14 days in a month for schools inspection but she did not visit GGPS Dalwati No.1 and GGPS Dalwati No.2 throughout her 15 months tenure in District Lakki Marwat due to multifarious responsibilities/engagements.

When she was asked as to how she made sure proper utilization of funds without visiting GGPS Dalwati No.1 and GGPS Dalwati No.2 personally? She replied that she had issued instructions to her subordinate officials time to time to keep a vigilant eye on incurrence of funds and ensure transparency and timely utilization of the same. She was recalled that she did not follow-up her instructions by undertaking field visits to see the ongoing construction/repair works and merely relied on her directions though she was duty bound for inspection and physically checking. Furthermore, the subordinate staff also used to report matters in verbal form. She could not give any convincing reasons.

She was asked about the existence of Planning & Development Wing in each District Education Office and Lakki Marwat as well, she replied that there was a F&D Wing in DEO office District Lakki Marwat where a technical person in BPS-16 served to assist the DEO(F)

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in undertaking her responsibilities with regard to planning and monitoring but during her tenure the said post was vacant. She affirmed that financial year starts from 1st July each year and closes on 30th of June of subsequent year. In response to another question, she stated that she did not know as to whether PTC funds are lapsable or otherwise.

When her attention was drawn to her letter No.856 dated 28-02-2015 (Annexure-J) wherein she had directed the SDEO(F) District Lakki Marwat to utilize the funds by 20-03-2015, knowing that the financial year was going to close on 30th of June 2015, why did she leave her subordinates with only 23 days for utilizing funds? she replied that the high-ups had directed her to do so through messages and in writing. When she was asked to provide any such evidence regarding directions from high-ups to utilize the said funds by 20-03-2015, she could not adduce any copy nor the departmental representative had any directions on record or agreed with her.

Ms. Shahana Yasmin, Ex-SDEO(F) District Lakki Marwat

She informed the committee that she had been serving the department for the last twenty nine (29) years including last eight (8) years service on Management Cadre/positions. Her tenure in District Lakki Marwat as SDEO(F) was from Feb-2014 to May-2015. Copy of written statement as well as questionnaire are annexed as Annexures-K & L.

When she was asked that she had caused loss to government exchequer by authorizing Ms. Zeenat Bibi to utilize the funds of GGPS Dalwati. No 2 through Chowkidar of the school concerned, she admitted that she vide her letter No.791-94 dated 12-05-2015 authorized Ms. Zeenat Bibi, Head Teacher, GGPS Khwaidat Khel Lakki Marwat to act as Secretary PTC for the purpose of utilization of the funds till regular posting of a Head Teacher / Secretary of PTC, but gave no specific orders to hand over funds to Chowkidar.

When she was asked as to how many times she visited GGPS Dalwati No.1 and GGPS Dalwati No.2 after the release of funds, she replied that after transferring Rs:10,23,000 each to the PTC accounts of GGPS Dalwati No.1 and GGPS Dalwati No.2, she visited both the schools and found GGPS Dalwati No.2 in very dilapidated condition. She further added that in view of the Parent Teacher Council's resolution dated 28-04-2015 and instructions from high-ups to utilize the funds by 20-03-2015, she authorized a teacher Ms. Zeenat Bibi, PSHT GGPS Khwaidad Khel Lakki City to act as Secretary PTC of GGPS Dalwati No.2. She presented a copy of the resolution of PTC (Annexure-M)

On a query that instead of providing a teacher on regular basis to a teacher-less school having 35 students enrolled, why did she authorize a teacher from another school to act as Secretary just for the purpose of withdrawing funds from the bank account and that too from a farflung area of over 35 KMs as per her statement. could she exercise any authority for the same or that was the mandate of DEO(F)? She replied that the government provided Rs:10,23,000/- to the school, which was in a dilapidated condition and the lives of the students were at risk. Furthermore, the DEO(F) Lakki Marwat vide her letter No.856 dated 28-02-2015 also directed her to utilize the funds by 20-03-2015 by any means.

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She affirmed the transfer of Rs:10,23,000/- each to GGPS Dalwati No.1 and GGPS Dalwati No.2, which were to be utilized by PTC of the said school getting all the required work done. However, when she visited GGPS Dalwati No.2, she observed that the work done was not according to the design/standard and was of low quality as well. Subsequently, she recorded her observation for shortcomings in the log book and directed Ms. Safia and Ms. Bibi Rabia, teachers of the same school that, "as the money is being utilized by the Chowkidar, if the work was not according to the required standards, action will be taken against". She presented a copy of the log book containing her remarks to the Committee which is annexed as Annexure-N.

She admitted that the standard practice of utilizing PTC funds is through a Purchase Committee from amongst the members of PTC actually play the leading role and supervise all purchases, rates, quality and documentation and that payments are always made against the work done. She was asked that contrary to above mentioned mechanism for utilization of PTC funds, why the amount was paid in lump-sum to the Chowkidar of GGPS Dalwati No.2 as per Stamp Paper signed by Secretary PTC and Chowkidar. She replied that the authority to utilize PTC funds rests with the PTC, therefore, they may be asked to answer this question. She further stated that in violation of the PTC rules, vide Stamp Papers No.780 dated 22-06-2015 and No. Nil Dated 12-05-2015, Saleem Khan Chowkidar s/o Wali Khan received Rs:8,23,000/- and Rs:2,00,000/- respectively. Both the documents were attested by Superintendent, SDEO(F), District Lakki Marwat, showing that she was aware of the illegal practice, she negated the notion.

She was asked that when she found the work to be of poor standard, being a non technical person, did she in the capacity of SDEO(F) District Lakki Marwat ask the DEO(F) Lakki Marwat to depute a technical person to check the work done, and fix responsibility against the defaulter?, She affirmed that she did not write to the DEO(F) District Lakki Marwat, but directed Mst. Safia and Mst. Bibi Rabia teachers to get complete the work.

She was asked that she vide her letter No.137 dated 10-02-2015 written to District Accounts Officer, District Lakki Marwat to transfer Rs:3,10,35,000/- in different schools PTC accounts including Rs:200,000/- to PTC account of GGPS Dalwati No.2, could she had the authority for the same? She replied that the said funds were released under her DDO Code, that was why she transferred the same amount to the respective schools PTC accounts.

She was asked to comment on (1) not posting a permanent teacher in GGPS Dalwati No.2 and authorizing MS. Zeenat Bibi PSHT from a 30 KM distant school, (2) not taking any action against Secretary PTC and Chowkidar concerned and (3) not informing the DEO(F) Lakki Marwat about the situation, not only suggests her incompetency and ignorance of the relevant PTC and financial rules but also her involvement in negative activity motivated by some consideration. She reacted that Lakki Marwat was a wide spread district and 70% schools were far-flung including 355 schools under her command. GGPS Dalwati No.2 located on the boundary of the district near *Dara Tung*. Every year, the flood, heads towards the school premises and damages the building. There were total 6 ASDEOs positions in the district wherein 3 positions were vacant during her tenure and that the concerned ASDEO of

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the GGPS Dalwati No.2 circle was on maternity leave. She further stated that being a Drawing & Disbursing Officer (DDO) of eight hundred (800) employees and unaware of the local language, she was unable to pay visits to all schools and supervise the works of PTC, renders her to be proceeded against.

Ms. Khurshid Begam PSHT Secretary PTC GGPS Dalwati No. 1

Ms. Khurshid Begam informed the Committee that she was serving the department for 33 years. She was currently serving in GGPS Dalwati No.1 since 24-07-2015. Copy of written statement as well as questionnaire are annexed as Annexures-0 & P.

She was asked to confirm that she paid lump-sum amount of Rs:10,23,000/- to the Chowkidar of GGPS Dalwati. No.1 she affirmed that Rs:10,23,000 was withdrawn by Mst. Sirk Zarra Chairperson PTC / mother of Chowkidar Mohammad Zaman in August and October 2015 in two installments. She further admitted that a Chairperson of PTC can not withdraw the money from the PTC bank account without the signature of the Secretary, and thus they both visited the bank and encashed the funds.

She was asked whether she knew that to utilize PTC funds, there was an eight (8) members Parent Teacher Council including five (5) members Purchase Committee under the Chairperson and that no amount could be utilized without their involvement/signatures. She was further asked as to how a Chowkidar succeeded in obtaining the fund in lump-sum. She explained that she wanted to utilize the fund directly under her supervision but the Chowkidar Mohammad Zaman adamant, forced and threatened her to pay the amount to get the work done through him as the Chairperson was also willing being her son.

She also admitted that she did not report the unlawful/ coercive behavior of the Chowkidar to the high ups?

She was asked whether the ASDEO/SDEO would visit the said school and construction work or otherwise? She stated that ASDEO/SDEO did visit the school and the work done by Chowkidar i.e. construction and plastering of boundary wall and construction and tiling of floor.

She was asked whether she reported to high ups or they took any notice of the misuse of funds. She replied that she only verbally reported the unlawful use of fund and not in writing. She stated that she was well aware of the PTC rules and that a Chowkidar can not utilize the fund but the Chairperson was agreed that Chowkidar would utilize the funds being her son.

She was asked to comment on the standard practice of fund utilization, i.e. making of payments against work done but she vide Stamp Papers No.1700 dated 04-09-2015 & No.7574 dated 30-11-2015 paid Rs:600,000/- and Rs:200,000/- respectively in lump-sum to Chowkidar? She contended that Chowkidar did not allow her to utilize the fund under her supervision.

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Ms. Zeenat Bibi PSHT (Retired) GGPS Khwaidad Khel Lakki City

Ms. Zeenat Bibi informed the committee that after serving for 41 years 4 months, she went on retirement from service w.e.f 30-03-2017. Copy of written statement as well as questionnaire are annexed as **Annexures Q & R**.

She was asked that she had paid lump-sum amount of PTC fund to the Chowkidar for further utilization in violation of the rules. She contended that she was serving in GGPS Khwaidad Khel Lakki City. When the government allotted funds, there was no teacher in GGPS Dalwati No.2. SDEO(F), District Lakki Marwat, Ms. Shahana Yasmin in her office in the presence of Chowkidar and Mst. Noor Nama, Chairperson of the PTC, asked her to act as Secretary PTC, which she refused but she (SDEO) insisted her to do so. Later on the SDEO(F) vide her letter No.791-94 dated 12-05-2015, on the request of Chowkidar GGPS Dalwati No.2 Saleem Khan, authorized her to act as Secretary PTC to utilize the funds of GGPS Dalwati No.2 by providing missing facilities to the school. Therefore, she visited the bank alongwith Ms. Noor Nama Chairperson PTC and paid the amount to her son/Chowkidar.

She further stated that there was sufficient distance between GGPS Khwaidad Khel and GGPS Dalwati No.2 she visited the school to confirm the missing facilities before making payments to the Chowkidar. She further added that both the schools were at a distance of 60 kilometers. She visited the school prior to the payment of funds to the Chowkidar and found the school building in a very dilapidated condition. There was no boundary wall, group latrine and the viranda was hanging.

She was asked as to how many times she and Chairperson withdrew the fund from the bank and paid to the Chowkidar? Was there any acknowledgment/receipt etc signed by the Chowkidar? She replied that Chowkidar was paid the amount twice for Rs:200,000/- and Rs:8,23,000/- and an acknowledgment was obtained from him on a Stamp Paper. The deed was signed in the presence of Ms. Shahana Yasmin, SDEO(F), District Lakki Marwat and her Superintendent Mr. Mohammad Din who attested the same. She further stated that there were other nearby schools to GGPS Dalwati No.2 like GGPS Dalwati No.1 and GGPS Bandi Mir Alam at a distance of 4 kilometers where Ms. Farzana Niazi and Ms. Azra Bibi were serving in that period. Likewise, GGPS Banda Khara is at a distance of 5 kilometers where a teacher was serving at that time but the SDEO(F) was bent on her authorization as Secretary.

She was asked as to how many times she visited GGPS Dalwati No.2 after transferring the funds and that how she made sure the transparent utilization of funds, the school being 60 kilometers away. She replied that after the transfer of fund to GGPS Dalwati No.2, she visited the school once and found that the work was not according to the standard whereof she made a verbal complaint to Ms. Shahana Yasmin, SDEO(F), District Lakki Marwat.

She was asked as to how long did she hold the office of the Secretary of GGPS Dalwati No.2 and did she had any experience as Secretary PTC? She replied that she was

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authorized just for the purpose of supervision/utilization the PTC funds and her duty was over after the withdrawal of money from the bank. She further stated that she served as Secretary PTC in her school i.e. GGPS Khwaidad Khel where she did not utilize the funds through Chowkidar but PTC Committee.

She was told that during the proceedings of the enquiry and from the written statement submitted by her, it was evident that she helped Ms. Noor Nama, Chairperson PTC / mother of Chowkidar to withdraw the fund from the PTC account and instead of utilizing it properly; he wasted/embezzled the public money. All this happened because she did not fulfill her duties with due care. She added she was unable to perform her additional duty as the school was 60 KMs away. She was asked as to why she agreed to undertake this difficult task if there was no element of personal interest? She replied that she refused many a times but Ms. Shahana Yasmin, SDEO(F) District Lakki Marwat compelled her to undertake this task.

She was asked that being Secretary PTC GGPS Khwaidad Khel, did she know the rules regarding utilization of funds of PTC? She replied that she knew the relevant rules and that under the supervision of Chairperson, a Purchase Committee was responsible for transparent utilization of the funds making sure that all the bills/vouchers were duly signed by all the members of the PTC.

She was asked about the expense record which she provided with her written statement as to whether the same were duly signed by all the members? She replied that all the bills/vouchers etc were only signed by her and Chairperson PTC and not by all committee members as it was told to them during trainings.

INFERENCE:

From the perusal of record produced before the Enquiry Committee, written statements of the accused officials and cross examinations whereof etc, the charges leveled in the charge sheet and statement of allegations stood proved beyond any shadow of doubt. All the accused officials were found hands in glove with each other as they intentionally tried to cover-up the wrong action and to mislead the Enquiry Committee. Under the policy/rules, all the officials involved in the episode were bound to follow the rules and regulations governing the subject vis-a-vis PTC Rules/TORs and Finance Department guidelines but they did not do so as a result they all are liable to be proceeded against under the relevant rules for their negligence, ignorance of rules, inefficiency/wastage of public money as they all were totally naïve and casual to their prime responsibilities/job description as well. The onus of responsibility is, no doubt, lies upon them.

Ms. Bibi Razia Ex-DEO(F)

- I. Ms. Bibi Razia Ex-DEO(F); District Lakki Marwat being head of the department failed to perform her administrative, supervisory, financial, monitoring powers according to the laid down procedure. She transferred PTC funds to the concerned

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schools accounts but no follow-up care was taken by her warranting her caliber and position.

- II. She did not know whether the PTC funds are lapsable or otherwise. PTC Rules are very much clear that these funds are not lapsable and can be used in succeeding year.
- III. She could not justify her act of issuing letter No.856 dated 28-02-2015 to Ms. Shahana Yasmin, Ex-SDEO(F) District Lakki Marwat to utilize all the unspent funds lying in PTC accounts before 20-03-2015 or else all the concerned official would be held responsible. This directive led to mismanagement / misappropriation / mis-utilization of funds providing SDEO(F) a chance to depute a female teacher Ms. Zeenat Bibi from GGPS Khwaidad Khel Lakki City to act as Secretary PTC at Government Girls Primary School Dalwati No.2 from a far-flung area. If it is presumed that the funds were lapsable then she should have considered the financial year duration which starts from 1st July and ends on 30th of June leaving subordinates with ample time to utilize the funds efficiently and transparently.
- IV. She did not visit / assert her authority to undertake visits to both GGPS Dalwati No.1 and GGPS Dalwati No.2 where an amount of Rs:10,23,000/- each was being spent and she was duty bound to spare 14 days for field visits, in case she happened to have visited the school well on time, the situation could have been different but she badly failed, shied away her responsibility and committed gross negligence.

Ms. Shahana Yasmin, Ex-SDEO(F)

- I. Ms. Shahana Yasmin, Ex-SDEO(F) badly failed in the performance of her official duties. She, vide letter No.791-94 dated 12-05-2015 authorized MS. Zeenat Bibi to act as Secretary PTC funds and deputed her from 60 KMs away, which was naturally impossible for her to manage the things smoothly, inspite the fact that some GGPS schools were existing nearer with teachers as well who could have been in a better position to utilize the money, albeit, Ms. Zeenat Bibi PHST was agitating her authorization / deputation for the purpose.
- II. Though she was in picture of the allocated amount of Rs:10,23,000/- each to GGPS Dalwati No.1 and GGPS Dalwati No.2 and its utilization through Chowkidar Mohammad Din and Saleem Khan respectively as her office Superintendent namely Muhammad Zaman had attested the stamp papers and as per statement of Ms. Zeenat Bibi PSHT, Ms. Shahana Yasmin SDEO(F) was present at the time of cash deliverance to Chowkidar which shows her bad intention, collusion.
- III. While recording her remarks in the log book and admitting that the work was not to the standard, she could not take any action nor reported to DEO(F) for action in the matter further casts doubts on her role in the financial wrong doings.
- IV. She misused her power, instead of requesting DEO(F) in the matter, she authorized MS. Zeenat Bibi PHST at her own rather a permanent teacher was required to be posted to secure the future of 35 students already enrolled. Her role in the whole episode is self motivated, puts a big question mark on her performance, hence needs to be taken into task.

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Ms. Zeenat Bibi, PSHT

1. Ms. Zeenat Bibi, PSHT Government Girls Primary School Khwaidad Khel Lakki City, Secretary PTC funds GGPS Dalwati No.2 authorized by Ms. Shahana Yasmin SDEO(F) badly failed in the performance of her official duties. Her active support and facilitation led to the misappropriation of Rs:10,23,000/- which were handed over to Chowkidar Saleem Khan s/o Wali Khan (son of Chairperson) in lump-sum. She was required to have agitated the authorization from such a far-flung school by SDEO(F) and again, if there was pressure from Chowkidar Saleem Khan and Chairperson, she should have brought the issue into the notice of high-ups. Her keeping mum over the issue renders her to be a part of the loss to government and liable to be proceeded against for commissions / omissions.

Ms. Khurshid Begam, Head Mistress GGPS Dalwati No.1, District Lakki Marwat

- I. Ms. Khurshid Begam, Head Teacher/Secretary PTC funds Government Girls Primary School Dalwati No.1, District Lakki Marwat facilitated Ms. Sirk Zara Chairperson in the withdrawal of Rs:10,23,000/- from the account and instead of utilizing it through Purchase Committee consisting of five (5) members, handed over the amount to Mr. Mohammad Din Chowkidar s/o Ms. Sirk Zara Chairperson and violated the laid down procedure. If there was some pressure from Chowkidar concerned, she should have informed her seniors. Due to her active support, connivance and facilitation, the allocated amount was misappropriated, which renders her to be proceeded against.

RECOMMENDATIONS:

In light of the foregoing facts and circumstances, the allegations against each official stand proved. Hence, the Committee recommends that:-

Ms. Bibi Razia Ex-DEO(F) Lakki Marwat now Principle GGHSS Chokara District Karak being totally ignorant of the rules and regulations, and who badly failed in the exercise of power, may be imposed major penalty to the extent of one step reduction-to-lower-scale-as required under Rule-4(1)(b)(i) of Government of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011. Besides, she may be banned / debarred from Administrative duties throughout her service.

Ms. Shahana Yasmin Ex-SDEO(F) Lakki Marwat now SDEO(F) Tank who played major role and despite all the issues in her knowledge, she could not take any action on time and kept mum over the issue. She may be imposed major penalty to the extent of one step reduction to lower scale as required under Rule-4(1)(b)(i) of Government of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011. Besides, she may be banned / debarred from field / administrative posting throughout her service.

Diary No. 2488
Date 28-11-77

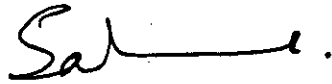
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8-12-77

Ms. Khurshid Begam PHST Secretary PTC GGPS Dalwati No.1 badly failed in the performance of her official duty and violated the rules and regulations. She may be imposed major penalty to the extent of one step reduction to lower scale as required under Rule-4(1)(b)(i) of Government of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011.

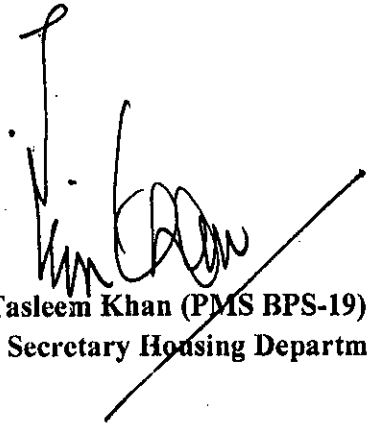
Ms. Zeenat Bibi GGPS Khwaidad Khel who have since been retired from service. It is suggested that proper assessment of the work done, if any, at GGPS Khwaidad Khel be carried out through C&W department in the presence of a responsible officer of the department to determine actual losses to the state and then recovery be effected from her pension accordingly. Moreover, the PTC's formation of both the schools are not according to the guidelines/TORs on the subject be revisited / reconstituted in greater interests of both the schools.

The Chowkidars namely Mohammad Din s/o Chairperson Ms. Sirk Zara and Mr. Saleem Khan s/o Chairperson Ms. Noor Nama of GGPS Dalwati No.1 and GGPS Dalwati No.2 respectively were supposed to ease, facilitate and assist the female staff, have been performing the role of bullies with a male dominating mindset be taken into task. After assesment of losses to the state, recovery may be effected from both the Chowkidars with proper proportion so that an example be set for others.

Submitted please.



Salma Akhtar
Principal GGHS Badber



Tasleem Khan (PMS BPS-19)
Addl: Secretary Housing Department

Diary No 2488
Date 28-11-77

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12/11/77



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**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Dated Peshawar the March 06th, 2018

OFFICE ORDER

No.SO(S/F)E&SED/4-17/2017/Misuse of PTC Fund of GGPS Dalwati No.1 & 2 : The Competent Authority is pleased to constitute Inquiry Committee comprising of the following officers to conduct special audit regardin misuse of PTC Fund of GGPS Dalwati No.1 & 2 UC Dara Tang Lakki Marwat, and evaluate the actual loss to the government exchequer:

- i. Internal Audit Officer, Internal Audit Cell,
Elementary & Secondary Education Department Peshawar
- ii. Engineer Taj,
M&E Officer, Planning Cell E&SE Department Peshawar


2. The Inquiry Committee shall submit recommendations/ report to the Competent Authority within fifteen (15) days positively.

SECRETARY

Endst: of even No. & date:

Copy forwarded to the:

- 1 Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2 Internal Audit Officer, Internal Audit Cell, Elementary & Secondary Education Department Peshawar (member inquiry committee).
- 3 Engineer Taj, M&E Officer, Planning Cell E&SE Department Peshawar (member inquiry committee).
- 4 District Education Officer (Female) Lakki Marwat.
- 5 PS to Secretary E&SE Department.
- 6 Master File.


(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)

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INQUIRY REPORT

Subject: Misuse of PTC funds allocated to GGPS Dalwati No 1 & GGPS Dalwati No 2, Lakki Marwat in 2013-14 & 2014-15

1. Background:

Initially, subject matter has been twice dealt with through inquiry committees formulated by Director, Elementary & Secondary Education Department and Secretary, Elementary & Secondary Education Department, respectively. The first committee constituted by Director, E&SE Department vide letter No 2761-65/(File Complaint against DEO (F), Lakki) dated 25th Nov, 2015 to inquire against DEO (F), Lakki Marwat for misuse of PTC funds, was headed by Mr. Muhammad Saleem, Principal Government Shaheed Sher Nawaz, (GMHS No 1), Tank. Afterwards, Secretary, E&SE Department in continuation to initial inquiry constituted another committee vide notification No SO (S/F) ESED/4-17/2017/Disciplinary action /Lakki dated 22nd Nov, 2017; wherein Mr. Taslim Khan (PMS BPS-19) Additional Secretary Housing Department and Ms. Salma Akhter (BPS-19) principal Government Degree College Badaber, Peshawar were appointed/notified as inquiry officers. Both the enquiry committees submitted their reports with detail/precise recommendations.

Nevertheless, Secretary E&SE Department vides his office letter No. SO (S/F) ESED /4-17/2017 dated 06 Mar, 2018 directed Internal Audit Cell and Monitoring and Evaluation (M&E) wing, E&SE Department to carry out special Audit of PTC funds allocated to GGPS Dalwati No 1 and GGPS Dalwati No 2, Lakki Marwat & physical evaluation of work done in order to ascertain the actual loss incurred to the public exchequer.

2. Funds allocated to GGPS Dalwati No 1 and GGPS Dalwati No 2:

Details of funds allocated for various missing facilities are as follows:

S/No	Name of School	Date of Establishment	Area Selected	Funds allocated	Total
1.	GGPS Dalwati No 1	1994	Security	2,00,000	
			Boundary Walls	6,63,600	
			Group Latrine	1,60,000	
			Total		10,23,000
2.	GGPS Dalwati No 2	1996	Security	2,00,000	
			Boundary Walls	6,63,600	
			Group Latrine	1,60,000	
			Total		10,23,000

(Note: The main allegation in the subject matter was the lump-sum payment of PTC Funds to the Chowkidars of Concerned Schools. It is pertinent to mention here that both the Chowkidars are the sons of Chairpersons of the school PTC Committee.)

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(Signature)

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3. Procedure adopted for financial/technical audit:

The inquiry Committee visited both Schools on 25th March, 2018 and all the relevant staff including PTC members of the concerned Schools were called for meeting. Other than that, Committee also examined auditable record which included available vouchers, Cash Books, Karwai register, Bank statement and physical evaluation of work done under different PTC funds.

4. Findings:

a. GGPS Dalwati No 1: According to the signed copy of EMIS report of DEO (F), Lakki Marwat, the facilities financed through PTC funds in this particular period were already available. The report claimed that Boundary Walls and Group Latrine existed in school during 2014-15 and same was again authenticated by the PTC Karwai register dated 27th August, 2015 wherein Karwai of the meeting of PTC members had registered that School Boundary Wall needed repair as they were partially damaged. (copy of EMIS as well Karwai register are attached as Annexure A). When physically examined, it was noticed that Barbed Wire had been newly installed on the Boundary Wall after giving it rising of 6 inches approximately on account of security measures. Moreover, some minor rehabilitation work was also visible in the class rooms and Group Latrine like grouting etc. Other than that, it was also witnessed during physical examination that School was recently white washed, probably in the wake of the inquiry committees' expected visit.

b. GGPS Dalwati No 2: As compared to GGPS Dalwati No 1, this school was found in miserable conditions. In spite of huge expenditure on the Boundary Wall, Group Latrine and Security measures, the infrastructure was in deplorable conditions as Boundary Wall was completely damaged. Record at hand claimed that structural work included the rehabilitation of Roof slab like conversion of T-iron girders into RCC slab; however, it was found that T-iron girders were replaced with same material and brick tiles were fixed on top of the roof with grouting. In addition to that, no record (auction receipts) was found available with regards to dismantled material which included T-irons, girders, brick tiles creating suspicions that whether rehabilitation works was even done or not. Similarly, EMIS report 2014-15 claimed that by the time of allocation of funds for Group Latrine, one GL was already available (copy attached as Annexure A). However, only one Group Latrine was available in the school at the time of inspection which made it difficult to ascertain that available toilet block is newly constructed or the old one is rehabilitated. Finally, School management was unable to provide any account of funds released for security measures.

It is also worth-mentioning that at the release of funds to this school, there was no teacher available in the school and school enrolment was virtually zero. These funds were allocated and spent under the plea that rehabilitation of school would facilitate enrolment and soon after that relevant number of teachers would also be transferred to this school. (Karwai register is attached as Annexure B). However, neither enrolment occurred in the School nor any teacher was transferred to the School and finally this School was merged into GGPS Dalwati No 1 vide SDEO letter No. 2271 dated 6th June, 2016.

D

5. Conclusion:

It was very visible from the state of affairs in the concerned schools that funds allocated were neither required nor any efficient planning was made to spend these funds on the actual need/demand of the Schools. District Education Officer had received these funds and they had to be spent somewhere else; therefore, these funds were dumped into these schools without ascertaining the actual needs and demands of the Schools functioning under the District Education Office, Lakki Marwat.

The Inquiry Committee had concluded that although allocated funds were spent in both Schools, but as per technical findings/calculations the funds spent are not more than Rs.444000/- and Rs.314805/- in GGPS Dalwati No. 1 and GGPS Dalwati No. 2 respectively.

The committee, therefore, recommends that recovery of Rs. 579000/- and Rs. 708195/- may please be made affected from the concerned of GGPS Dalwati No 1 and GGPS Dalwati No 2 respectively.

M&E Officer (Tech)
Strengthening of Planning Cell
Elementary & Secondary Education
Department, Peshawar.

Audit Officer
Internal Audit Cell
Elementary & Secondary Education
Department, Peshawar

SHOW CAUSE NOTICE

I, **Mehmood Khan, Chief Minister Khyber Pakhtunkhwa**, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, **Mst. Bibi Razia (BS-18) Ex-DEO (F) Lakki Marwat now Principal GGHSS Chokara Karak**, as follows:

- a. You being head of the department failed to perform your administrative, supervisory, financial and monitoring powers by transferring PTC funds to the concerned school without any follow-up/ supervision.

I am satisfied that you have committed the act of "Miss-conduct/ In-efficiency" as specified in Rule-3 of the said rules.

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

3. As a result, thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty(s) under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

- i. Reduction to lower post for a period of 01-year.
- ii. _____

4. You are, thereof, required to show cause as to why the aforesaid penalty/ penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, in the normal circumstances, it shall be presumed that you have no defense to put in, and in that case an ex-parte action shall be taken against you.

6. A copy of the findings of the fact-finding inquiry is enclosed.



**(MEHMOOD KHAN)
CHIEF MINISTER KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY**

**Mst. Bibi Razia (BS-18),
Ex-DEO (F) Lakki Marwat,
Now Principal GGHSS Chokara Karak,
(Accused)**

SHOW CAUSE NOTICE

I, **Mehmood Khan, Chief Minister Khyber Pakhtunkhwa**, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, **Mst. Shahana Yasmin (BS-17) Ex-SDEO (F) Lakki Marwat now SDEO (F) Tank**, as follows:

- a. You badly failed in performing your official duties as you authorized Mst. Zeenat Bibi to act as Secretary PTC Fund and deputed her 60 kilometer away, being naturally impossible for her to manage the things smoothly; you also kept mum over utilization of PTC funds by the Chowkidars and did not take any action.

I am satisfied that you have committed the act of "Miss-conduct/ In-efficiency" as specified in Rule-3 of the said rules.

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

3. As a result, thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty(s) under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

- i. Reduction to lower post for a period of 01-year.
- ii. _____

4. You are, thereof, required to show cause as to why the aforesaid penalty/ penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, in the normal circumstances, it shall be presumed that you have no defense to put in, and in that case an ex-parte action shall be taken against you.

6. A copy of the findings of the fact-finding inquiry is enclosed.



**(MEHMOOD KHAN)
CHIEF MINISTER KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY**

**Mst. Shahana Yasmin (BS-17),
Ex-SDEO (F) Lakki Marwat,
Now SDEO (F) Tank,
(Accused)**

SHOW CAUSE NOTICE

I, **Mehmood Khan, Chief Minister Khyber Pakhtunkhwa**, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, **Mst. Khurshid Begum (BS-15) PSHT/ Secretary of PTC GGPS Dalwati No. 1 Lakki Marwat**, as follows:

- a. You facilitated Ms. Sirk Zara, Chairperson in the withdrawal of Rs. 10, 23, 000/- from the account and handed over the amount of Mr. Muhammad Din, Chowkidar.

I am satisfied that you have committed the act of "Miss-conduct/ In-efficiency" as specified in Rule-3 of the said rules.

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

3. As a result, thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty(s) under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

- i. Reduction to lower post for a period of 01-year.
- ii. Recovery of Rs. 57,900/-

4. You are, thereof, required to show cause as to why the aforesaid penalty/ penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, in the normal circumstances, it shall be presumed that you have no defense to put in, and in that case an ex-parte action shall be taken against you.

6. A copy of the findings of the fact-finding inquiry is enclosed.



(MEHMOOD KHAN)
CHIEF MINISTER KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY

**Mst. Khurshid Begum (BS-15),
PSHT/ Secretary of PTC,
GGPS Dalwati No. 1 Lakki Marwat,
(Accused)**

SHOW CAUSE NOTICE

I, **Mehmood Khan, Chief Minister Khyber Pakhtunkhwa**, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, **Mst. Zeenat Bibi (BS-15) PSHT/ Secretary of PTC GGPS Dalwati No. 2 Lakki Marwat**, as follows:

- a. You badly failed in performing your official duties. Your active support and facilitation lead to the misappropriation of Rs. 10, 23, 000/- which were handed over to Chowkidar Mr. Salim Khan in lump-sum.

I am satisfied that you have committed the act of "Miss-conduct/ In-efficiency" as specified in Rule-3 of the said rules.

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

3. As a result, thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty(s) under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

- i. Recovery of Rs. 708,195/-
- ii. _____

4. You are, thereof, required to show cause as to why the aforesaid penalty/ penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, in the normal circumstances, it shall be presumed that you have no defense to put in, and in that case an ex-parte action shall be taken against you.

6. A copy of the findings of the fact-finding inquiry is enclosed.

(MEHMOOD KHAN)
**CHIEF MINISTER KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY**

**Mst. Zeenat Bibi (BS-15),
PSHT/ Secretary of PTC,
GGPS Dalwati No. 2 Lakki Marwat,
(Accused)**



CONFIDENTIAL
 GOVERNMENT OF PAKISTAN
 NATIONAL ACCOUNTABILITY BUREAU
 BLOCK-III, PDA COMPLEX, PHASE-V HAYATABAD
 PESHAWAR

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Complaint Verification Cell

SAY NO TO CORRUPTION

No. 4/17/3334-15/(CVC)/NAB (KPk)/782
13 November, 2015

To: The Secretary to Govt of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department,
Peshawar.

Subject: Complaint Against Razia Khattak DEO (Female), Lakki Marwat

It has been learnt reliably that Repair budget for Govt Girls Pimray school No-1 & 2, Wanda Devti Union, Council Dara Tang District Lakki Marwat, has been embezzled with the connivance of Officers of District Education Office.

2. You are requested to take appropriate action at your end, please.

SSC
800 (complaints)
19/11

(Signature)
(Syed Mahmood Ali)
Deputy Director (Coord)
Complaint Cell
Ph: 091-9217561

853
08/11

CONFIDENTIAL