FORM OF ORDER SHEET

Court of		
Case No	•	561/ 2023

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	Case	No
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	14/03/2023	The appeal of Mst. Shama Begum resubmitted today by Mr. Muhammad Irshad Mohmand Advocate. It is
		fixed for preliminary hearing before Single Bench at
		Peshawar on . Parcha Peshi is given to
		appellant/counsel for the date fixed.
· -		By the order of Chairman
1		REGISTRAR
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The appeal of Mst. Shama Begum Ex-PST GGPS Pegham Koroona Tehsil and District Charsadda received today i.e. on 03.03.2023 is incomplete on the following score which is returned to the co Counsel for the appellant for completion and resubmission within 15 days.

- 1- Page no. 23, 26, 10**0**106, 109, 110, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 128, 130, 131 to 139 of the appeal are illegible which may be replaced by legible/better one.
- 2- Certificate be furnished that whether any petition on the subject matter has earlier been filed in this court.

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Muhammad Irshad Mohmand Adv. High Court Peshawar.

Resubmitted after court/tribunal compliance . [11]

14/03/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

Service Appeal No:

Mst Shama Begum

(Appellant)

VERSUS

Government of KPK, through Secretary Elementary & Secondary Education KPK & Others (Respondents)

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Appellant: Mst Shama Begum

Through

Muhammad Irshad Mohmand Advocate High Court

> han Shèikh Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICE , TRIBUNAL PESHAWAR

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Service Appeal No: 56/-1/2023

Mst Shama Begum (Ex-PST) GGPS Pegham KoroonaTehsil & District Charsadda (Appellant)

VERSUS

- 1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Department KPK, Peshawar
- 2. Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar
- 3. District Education Officer (DEO) (Female) District Charsadda
- 4. Agency Education Officer Khyber Agency Now DEO Female District Khyber
- S. District Education Officer (Female) District Battagram (Respondents)

SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED OFFICE ORDER NO 12025-30 DATED 16-06-2022 WHEREBY THE INITIAL IMPUGNED OFFICE ORDER NO.10643 DATED 22/11/2017 PASSED BY THE RESPONENT NO 3 / DEO (FEMALE) CHARSADDA HAS BEEN KEPT MAINTAINED, AND THE SERVICE OF THE APPELLANT HAS BEEN DISPENSED BEING NO MORE REMAINED TEACHER AND THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED WITHIN THE STIPULATED PERIOD.

Prayer:-

On acceptance of this Service Appeal, both the impugned Office Order No 12025-30 dated 16-06-2022 & initial impugned office order No 10643 dated 22/11/2017 passed by the Respondent No 3 / DEO (Female) Charsadda whereby the service of the appellant has been dispensed may kindly be set aside and the Appellant be re-instated to her service with all back benefits.

Any other remedy which this august tribunal deems appropriate may also be granted to the appellant.

Respectfully Sheweth:-

The brief facts leading up to the filing of this appeal are as under:-

- 1. That the Appellant was initially appointed as PTC trained in B.P.S 07 vide appointment order No 2095-2100 dated 07/05/2003 issued by the Respondent No 4 with the approval of competent authority after adopting all the codal & legal formalities, which was later on upgraded to B.P.S-12 and posted at Government Girls Primary School, Aka Khel Bara, Khyber Agency Now District (Copy of Appointment Order dated 07-05-2003 & Service Book is attach as Annex "A")
- 2. That the appellant was performing her duty with great zeal & zest and no complaint whatsoever was made against the appellant and in the year 2011 vide transfer Order dated 13/04/2011 the appellant was transferred from District Khyber to District Batagram by the Respondent No 2 / Director E & SE Khyber Pakhtunkhwa Peshawar and posted as PST at Government Girls Primary School Pimal Sharif Battagram and LPC was also issued by the concern officer to the appellant and thereafter the Respondent No 2 / Director E & SE KPK

Peshawar issued transfer order whereby the appellant was transferred from District Battagram to District Charsadda duly issued LPC by Respondent No 5 / DEO Female Battagram and thereafter the appellant was further transfer to different school and was performing her duty with honestly (Copy of transfer order, LPC, further transfer orders along with LPC and attendance Certificate are attach as Annex "B")

- 3. That the service record / documents of the appellant was also duly verified vide letter No 475 dated 02-04-2013 from the concerned officer and thereafter released the pay of the appellant and vide letter No 990 dated 13-05-2013 appointment order was further verified from the quarter concerned as evident from the letters issued, and the appellant was performing her duty with great zeal & zest up to the entire satisfaction of her high ups but then the salary of the appellant was illegally stopped despite the fact that the appellant was regularly performing her duty which is clear from the attendance therefore the appellant is entitle for the monthly salary of unpaid period (Copy of verification letters & Pay slip are attach as Annex "C")
- 4. That the Respondent No.3 / DEO Female Charsadda without issuance of charge sheet & statement of allegation and without conducting any detail departmental inquiry straightaway issued the impugned office order dated 22/11/2017 whereby service of the appellant was dispensed. (Copy of initial impugned office order dated 22/11/2017 is attach as Annex "D")
- 5. That the appellant filed departmental appeal against the impugned order dated 22-11-2017 before the Respondent No.2 / Director E & SE KPK Peshawar which was rejected vide order dated 29-12-2017 but the same was communicated on 05-10-2018 to the appellant, thereafter the appellant filed Service appeal No 1390 / 2018 which was allowed vide order dated 11-11-2021 by setting aside the impugned order and the case was

remanded to the Respondents for regular and detail inquiry within 90 days (Copy of Service Appeal & judgment / order dated 11-11-2021 passed by this Honorable Tribunal is attach as Annex "E")

- 6. That the Respondent were not implementing the judgment / order of this Honorable Tribunal, therefore the appellants along with others filed implementation application before this Honorable Tribunal, it is pertinent to mention here that the appellant implementation application is not available being missing and during the pendency of execution petition, the Respondent No 3 submitted the alleged inquiry report just to absolved herself from the direction of this Honorable Tribunal by preparing the alleged inquiry report and without conducting any detail inquiry as order by this Honorable Tribunal, the DEO (Female) Charsadda again passed the impugned Office Order No 12025-30 dated 16-06-2022 whereby the initial order dated 22-11-2017 has been kept maintained by dispensing the service of appellant but the same was not conveyed & received to the appellant, and it is pertinent to mentioned here that the alleged inquiry was submitted by the Respondents in the execution proceeding on 17-10-2022 before this Honorable Tribunal, wherefrom the appellant has got the knowledge of the alleged impugned office order dated 16-06-2022 and this Honorable Tribunal disposed-off the execution petition vide order dated 04-11-2022.(Copy of alleged Inquiry report & impugned office order dated 16-06-2022 & execution disposed-off order dated 04-11-2022 are attach as Annex "F")
- 7. That the appellant then filed departmental appeal against the impugned Office Order No 12025-30 dated 16-06-2022, before the Respondent No 2 / Director Education KPK Peshawar but the same has not been responded within the statutory period.(Copy of Departmental Appeal is attach as Annex "G")

1.

8. That the appellant being aggrieved from the impugned service dispensing Order No 12025-30 dated 16-06-2022 & impugned office order No 10643 dated 22/11/2017 passed by Respondent No 3 / DEO (Female) Charsadda and by not responding the departmental appeal within the stipulated period prefer the instant service appeal before this Honorable Tribunal on the following Grounds:-

GROUNDS

- A. That both the impugned office order No 12025-30 dated 16-06-2022 & initial impugned office order No 10643 dated 22/11/2017 passed by the DEO (Female) Charsadda are totally illegal, against E&D Rules 2011, justice and facts of the case therefore not tenable.
- B. That according to the Direction of this Honorable Service Tribunal no inquiry has been conducted, nor any show cause notice / charge sheet & statement of allegation has been issued to the Appellant, nor the Appellant was informed or associated in the alleged inquiry and no opportunity of hearing has been provided to the Appellant, therefore the impugned order has been passed on the back of the appellant, meaning thereby that the initial order of DEO (Female) Charsadda has been endorsed without complying the direction of this Honorable Tribunal.
- C. That the alleged inquiry officer / committee has not called the appellant for inquiry proceeding and the alleged inquiry report was prepared just to absolved her self by the DEO (Female) Charsadda from the direction of this Honorable Tribunal, therefore both the impugned office orders are illegal and not according to law nor inconsonance with the fact of the case rather the same has been passed to show that the inquiry proceeding has been conducted in the light of the order of Honorable Tribunal.

D. That the appellant has been appointed in the year 2003 and the DEO (Female) Charsadda has been awakened from deep slumber in the year 2017 by declaring the appointment order of the appellant to be fake, despite the fact that every year in the service book of the appellant, the service of the appellant has been verified by the competent authority, therefore the allegation of fake appointment of the appellant is baseless and based on mala fide.

O.

- E. That in the alleged inquiry, there is no assertion of the officer / competent authority of the relevant time who has denied the appointment order of the appellant nor the statement has been recorded of the officer, who had appointed the appellant by the inquiry officer to determine the genuineness or fakeness of the appointment order of the appellant.
- F. That the appellant has more than 10 year service on her credit which is mature for pension and at this belated stage, it does not appeal to the prudent mind that the appointment order of the appellant is false or fraudulent and fake.
- G. That the alleged inquiry officer has not followed the E & D Rule 2011 in letter & spirit rather the same has been violated by submitting a frivolous inquiry report for dispensing the service of the appellant and the impugned order are liable to be struck down being not sustainable under the law.
- H. That the word dispensing is nowhere mentioned in the service law or E & D Rule 2011, therefore the impugned dispensing order as well as the alleged inquiry conducted by the so called inquiry officer are not true & correct in the light of the judgment & direction of this Honorable Tribunal, therefore both the impugned orders are liable to be set aside.

- I. That while dispensing the service of the appellant, no final show cause notice was issued to the appellant and the appellant has been kept un informed from the alleged inquiry and the alleged inquiry was filed in the execution proceeding on 17-10-2022 before this Honorable Tribunal, wherefrom the appellant has got the knowledge of the alleged inquiry & impugned order, and the execution petition was disposed-off on 04-11-2022.
- J. That any other ground will be raised at the time of final arguments with the permission of this Honorable Tribunal.

Prayer:-

It is therefore most humbly requested that on acceptance of this Service appeal on behalf of appellant, the impugned service dispensing Order No 12025-30 dated 16-06-2022 & impugned office order No.10643 dated 22/11/2017 passed by the Respondent No 3 / DEO (Female) Charsadda as well as the inaction of the Respondents on the departmental appeal of the appellant be declared as illegal against the service law & E & D Rule 2011 may graciously be set aside and the appellant be re-instated to her service with all back benefits including of unpaid monthly salary for the end of justice.

Certificate

As per instruction of my

client no such like Appeal

has earlier been filed by The

Appellant before this Honorable Tribunal.

Appellant: Mst Shama Begum

Muhammad Irshad Mohmand Advocate High Court

Farhan Sheikh Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No:

-P /2023

Mst Shama Begum

(Appellant)

VERSUS

Government of KPK, through Secretary Elementary & Secondary Education KPK & Others (Respondents)

AFFIDAVIT

I Mst Shama Begum (Ex-PST) GGPS Pegham KoroonaTehsil & District Charsadda, do hereby solemnly affirm and declare that all the contents of the accompanied service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal.

DEPONENT

Identified by

Muhammad Irshad Mohmand Advocate High Court

Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No:

.-P /2023

Mst Shama Begum

(Applicant)

VERSUS

Government of KPK, through Secretary Elementary & Secondary Education KPK & Others (Respondents)

APPLICATION FOR SUSPENSION OF BOTH THE IMPUGNED OFFICE ORDER NO 12025-30 DATED 16-06-2022 & INITIAL IMPUGNED OFFICE ORDER NO.10643 DATED 22/11/2017 PASSED BY THE DEO (FEMALE) CHARSADDA WHEREBY THE SERVICE OF THE APPELLANT HAS BEEN DISPENSED MAY KINDLY BE SUSPENDED AND THE APPELLANT BE ALLOWED TO PERFORM HER DUTY TILL THE FINAL DECISION / OUTCOME OF THE CASE

Respectfully Sheweth:-

The applicant submits as under:-

- That the above noted service appeal is being filed before this Honorable Tribunal in which no date of hearing has yet been fixed.
- 2. That the Respondents without issuance of show cause notice / charge sheet & statement of allegation and without following the lawful procedure as provided under the law and without conducting any detail inquiry as directed by this Honorable Tribunal again issued the impugned office order dated 16-06-2022 whereby the service of the appellant has been dispensed, and the word dispense is nowhere mentioned in the service law, therefore the appellant has got a good prima facie case in her favour



and balance of convenience also lies in favour of appellant and in sanguine of its success.

- 3. That while passing the impugned order by Respondent No 3, no final show cause notice has been issued to the appellant and just for nothing the service of the appellant has been dispensed, therefore the both the impugned orders be suspended and the appellant be allowed to perform her duty.
- 4. That if the impugned orders are not suspended the appellant will further suffer without any reason & lawful justification
- 5. That the facts and grounds of the appeal may kindly be read as an integral part of this application.

Prayer:-

It is therefore respectfully prayed that on acceptance of this application, both the impugned Office order No 12025-30 dated 16-06-2022 & initial impugned Office order No 10643 dated 22/11/2017 passed by the Respondent No 3 / DEO Female Charsadda whereby the service of the applicant / appellant has been dispensed may kindly be suspended and the appellant be allowed to perform her duty till the final decision of the case.

Applicant: - Mst Shama Begum Through

Muhammad Irshad Mohmand Advocate High Court

AFFIDAVIT

I, Mst Shama Begum (Ex-PST) GGPS Pegham KoroonaTehsil & District Charsadda, do hereby solemnly affirm and declare that all the contents of the accompanied Application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal.

DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No:

-P /2023

Mst Shama Begum

(Appellant)

VERSUS

Government of KPK, through Secretary Elementary & Secondary Education KPK & Others (Respondents)

ADDRESSES OF PARTIES

Mst Shama Begum (Ex-PST) GGPS Pegham KoroonaTehsil & District Charsadda (Appellant)

VERSUS

- 1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Department KPK, Peshawar
- 2. Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar
- 3. District Education Officer (DEO) (Female) District Charsadda
- **4.** Agency Education Officer Khyber Agency Now DEO Female District Khyber
- 4. District Education Officer (Female) District Battagram

(Respondents)

Appellant: Mst Shama Begum

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Muhammad Irshad Mohmand

Advocate High Court

Farhan Sheikh

Advocate

(12) AMER of

OFFICE OF THE AGENCY EDUCATION OFFICE KHAYBER AGENCY

APPOINTMENT ORDER.

Consequent upon the approval of competent authority that Mst Shama Begum D/O Zarin (Non Local Candidate) is hereby appointed as PTC trained in BPS-07 plus usual allowances as admissible under the rule at Govt; Girls Primary School, Aka Khel Bara Khyber Agency against vacant in the interest of Public service with effect from the date of her taking over charge under the following terms and conditions.

TERMS & CONDITIONS.

- 1. The appointment is purely on temporary basis and subject to termination at any time without assigning any reasons or prior notice. In case he wishes to leave the post he shall to submit one month, prior notice or in lieu thereof forfeit one month pay and allow aces to Government.
- 2. She should produce her health and age certificate from the Agency Surgeon concerned. Within seven day reporting arrival for duty as required under the rules.
- 3. Her Education qualification should be checked before the handing taking over charge of the post.
- 4. In case the candidate fails to take over the charge with in 10 days from the date of issue of her appointment will stand canc3elled automatically
- 5. The candidate should not be handed over the charge if his age exceed 25 years or below 18 years.
- No Joining time is allowed except what is absolutely necessary for transit.
- 7. The pay scale and service rules would be subject to revision in accordance with orders to be passed by the Govt: of NWFP, from time to time.
- 8. Charge reports should be sent to all concerned.
- NO TA/TA etc is allowed being first appointment.

AGENCY EDUCATION OFFICER KHYBER AGENCY

Endst Na**2015-2100**

Dated 7/5/2003

Copy forwarded for information & necessary action to the

- 1. P.S. to Secretary to Governor NWFP, Peshawar
- 2. P.A. to Director of Education FATA NWFP, Peshawar
- 3. Agency Surgeon concerned.
- 4. Agency Accounts Officer Khyber Agency
- 5. Assistant Agency Education Officer Khyber Agency
- 6. Cashier Local Office.
- 7. Personal file.

AGENCY EDUCATION OFFICER

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(or)

ELEMENTARY & SECONDARY EDUCATION

Consequent upon the approval by the Competent Authority, the following Mutual transfer of PAT (Female) from FATA to Settle area are hereby order in their own Pay and BPS in the interest of Public service with effect from the date of their taking over charge.

S.No	The state of the s	Where adjusted as PST	Remarks.
1.	Mst: Shamma Begum PST GGPS.Aka khel Bara Khyber Agency	Govt: Girls Primary School. Pimal Sharif Battagram	Vice S. No. 2 (Mutual Transfer)
2.	Mst: Naheed Begum PST GGPS Pimal Sharif Battagram	Govt: Girls Primary School. Aka Khel Khyber Agency	Vice S.No.1 (Mutual Transfer)

Note. 1. Charge report should be sent to all concerned.

2. NO TA/DA etc is allowed.

3. The Executive District Officer/Agency Education Officer Concerned to check the original Service documents in respect of PST concerned before release of their pay.

Their Seniority List Bill be determined under the rule.

DIRECTOR **ELEMENTARY & SECONDARY EDUCATION NWFP, PESHAWAR**

Endst No. 12085-97/F.No.103/PTC (F) FATA to Sell: Dated Pesh the 13/04/2011.

Copy forwarded for information & necessary action to the:-

- Private Secretary to Secretary Elementary & Secondary Education NWFP. Peshawar 1:-
- Private Secretary to Minister Elementary & Secondary Education NWFP Peshawar. 2:-
- Accountant General NWFP, Peshawar. 3:-
- Director OF Education FATA NWFP, Peshawar 4:-
- 5:-District Accounts Officers Battagram.
- 6:-. Executive District Officer (E&SE) Battagram.
- Agency Education Officer Khyber Agency at Jamrud. 7:-
- Agency Accounts Officer Khyber Agency at Jamrud. 8:-
- P.A to Director Elementary & Secondary Education NWFP, Peshawar. 9:-
- 10:-Candidates Concerned.
- 11:-Personal Files

Deputy Director (Estt) (E&SE) NWFP, Peshawar.

(22)

LAST PAY CERTIFICATE.

1. Last pay Certificate of	Mst Shama Begum
Of the	GGPS, Akka Khel Bara Khyber Agency.
Proceeding of	transfer.
To	GGPS, Pimal Sharif Battagram.
2. She has been paid upto	31/5/2011
At the following rates:-	
Particulars.	TI BY COMPONI
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Copy forwarded to the;-	
 District Accounts Officer, Battagg 	ram
2. SDEO(F) Battagram.	
	Agency Education Officer
$I \sim I$	Jamrud at Khyber Agency.

(23)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER FAKILTUNKHWA, PESHAWAR.

OFFICE ORDER

Consequent upon approval of the competent authority and ban relaxation, Mst Shama Begum PST GGPS Paimal Sharif Battagram is hereby transferred against the vacant post of PST at GGPS Paigem I mana Charsadda, on her own pay and BPS with effect from the date of her taking over charge.

Note -

- 1 Charge report should be submitted to all concerned.
- 2 No TA/DA etc are allowed
- 3 The FDO (EESE) concerned are directed to check the original service documents before making payment of salaries.
- 4. Her seniority will be determined at the bottom of Sen. List under the rules.

Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Endsi: No 3 4 64 - 1. No.51/Gen. Triansfer(F)

Dated Peshawar the 7 19/2011

Copy forwarded for information and necessary action to the

- L'executive District Officers (L&SE) Battagram & Charsadda.
- 2. District Accounts Officers Battagram & Charsadda.
- 3. DDO (F) concerned
- 4. Official concerned.
- 5. Master File.
- 6. PA to Director local office.

Deputy Directicss (Estab) (E&SE) Khyber Paklituikhwa.

Cesnawar

CONTROL SAN SAN SAN SAN

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER

Consequent upon the approval of the competent authority and relaxation, Mst Shama Begum PST GGPS Painmal Sharif Battagram is hereby transferred against the vacant post of PST at GGPS Paigam Korona Charsadda, on her own pay and BPS with effect from the date of her taking over charge.

Note:-

- 1. Charge report should be sent to all concerned.
- 2. NO TA/DA etc are allowed.
- 3. The DEO (Female) Charsadda is directed to check all service documents before the release of pay.
- 4. Her seniority will be determined as per rules / policy.

Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Endst No..3464-69/F No. 51/Gen/ Transfer (F)

Dated Peshawar the 07.09.2011

Copy for information to the:

- 1. Executive District Officer (E&S) Battagram Charsadda
- 2. District Account's Officer Charsadda / battagram.
- 3. DDO (F) concerned.
- 4. Official concerned.
- 5. Master File
- 6. PA to Director Local Directorate

Deputy Directress (Estb) (E&SE) Khyber Pakhtunkhwa, Peshawar



LAST PAY CERTIFICATE. Q
Cortificate of Shama Begun PST 720=0038/37/
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The following PSTs teachers are hereby adjusted to the station noted against each name. on their own pay and scale in the interest of public service with immediate effect.

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Ž.	ZS No.	Name & Designation From:	<u> </u>
į	ILON TO STATE OF	Miss Shama Begum GGCMS Tehbana Dheri	GGPS Halim Abad
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12	3 2 .	Farkhanda Bakht i St. GG/S Stumminata Omer Kartonia	
į	豪	Ghazgi, Landa L	

Note: No TA/DA is allowed.

Charge report should be submitted to all concerned.

Copy for information to the:

- 1 Head Mistress concerned.
- 2. Official concerned.
- 3. Office file

SUB-DIVISIONAL EDUCATION OFFICER (F)

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) CHARSADDA

OFFICE ORDER

The following PSTs teachers are hereby adjusted to the station noted against each name on their own pay and scale in the public service with immediate effect.

S No)	Name & Designation	From	То
			GGCMS Tehbana Dheri	GGPS Halim Abad
	2.	Farkhanda Bakht.PST	GGPS Muhammad Umer	GGCMS Tehbana
			Korona Ghazgi	Dheri

Note: No TA/DA is allowed

Charge report should be submitted to all concerned

SUB-DIVISIONAL EDUCATION OFFICER (F) • CHARSADDA

Endst No. 708-11/ Dated 25.05.2013

Copy for information to the:

- 1. Head Mistress concerned.
- 2. Official concerned.
- 3. Office file.

SUB-DIVISIONAL EDUCATION OFFICER (F)
CHARSADDA



In pursuance of the Rationalization Policy circulated by Director E&SED Endst; No. OFFICE ORDER. 6104-59/Ratignalization / Estab dated Peshawar the 01/04/2017 and subsequent amendment issued vide Drive-Syrkatiqualization / Estau dated reshawar me 67/04/2017 and subsequent amenoment issued vide findst. No. 4499-4501/ F.No. 1 /A-88/KC/S. List dated 27-10-2015 followed by Email on dated 15/04/2017. And proposed / Recommended by the SDEO(F) Charsadda /Shabqader / Tangi the 15/04/2017. And proposed / Recommended by the SDEO(F) Charsadda /Shabqader / Tangi the following surplus PSTs (BPs-12) & SPST(BPs-14) of Tehsil Charsadda /Tangi & Shabqader are here by transferred in their own pay & Scale to the Needy Schools /Single Teacher Schools mentioned against transferred in their own pay & Scale to the Needy Schools /Single Teacher Schools mentioned against each as a Staff Gape arrangements in the interest of public service and with immediate effect.

ti ant	sterred in their dam par	ements in the interest of publ	Personal School for	REMARKS.
	Name of Teacher	Present School	Proposed School 7,65	
S,No.	Name of Tuesday	_ <u></u>	Transfer	Surplus/Need Base
	The second secon	GGPS Masood Kheel	GGPC Meera Kheel	_
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	PST Bostan	GGPS Dag Wal Nissata	GGP3 Gul Bahar Kuladher	, J
1.	Magana			Surplus/Need Base
`.	PST	GGPS Sharabara Awan	GGPS Gul Abad Sardaryab	Surplusifices
3.	Imitiaz PST		· ·	DI d Bara
		Abad Khool Ondeem	GGPS Gul Abad Sarderyab	Surplus/Need Base
4.	Bibi Fatima PST	GGPS Qazi Kheel Qadeem	GGPS Marchaki	Surplus/Need Base
5	Norcen PST	GGPS Papra	GGPS Dheri Hameed Mian	Surplus/Need Base
	Shehnaz Begum	GGPS Nemoray Baba	GOL2 Dilett transfer	
ο.	SPST 14		GGPS Geedar Killi	Surplus/Need Base
	Shahida Begum	GGPS Shains Abad	GGPS Geedar Kam	1
7.	PST Dogum		CCRS Manzori	Surplus/Need Base
	The state of the s	GGPS Sher Payan	GGPS Manzori) Supra
8 .,	(alamaan			Surplus/Need Base
	PST	GGPS Tarnab I	GGPS Akhoon Zadgan	Surplus/Need Base
9.	Abida Begum	GGPSTariq Abad Utmanza	i GGPS Rajjar	Surplus/Need Dasc
10	Jachmina Nazli PST		ii GGPS Rajjar	Surplus/Need Base
111 .	Robina Begum PST		GGPS Palato	Surplus/Need Base
12	Shagoffa Bahar	GOP3 Citatinang 1999		
{	PST	A bud	GGPS Chitral Koroona	Surplus/Need Base
13	Sho a PST	GGPS Halcom Abad	GGPS Rasaldar Killi	Surplus/Need Base
14	Gul Zeb PST	GGPS Ahmad Khan Killi	GGPS Bakro Baba	Surplus/Need Base
15	Maryam PST	GGPS deedar Abad	GGPS Qadeem Abad No.1	Surplus/Need Base
16	Tahira Saced PST	GGPS Umerzai No.2	Zar Bab Gahri	Surplus/Need Dasc
.1	Nadia Ijaz PST	GGPS Mera Umerzai	Zar Bab Gailli	Surplus/Need Base
17	KhadijaTabassum	GGPS Sherin Klian Killi	GGPSKuladhand Payan	
18	1			Surplus/Need Base
}	PST	GGPS Turangzai	GGPS Abdul Hamid	Surplus/Need Base
19	Kausar noor PST		GGPS Dara Behlola	Surplus/Need Base
20	Shaista Hassan PS	GGPS Safder Koroona	1 GGPS 100f Nam	
21	Summaya PST	Cut Killi	GGPS Behlola Payan No	1 Surplus/Need Dasc
22	Shehnaz Begun	m GGFS riajt i at GSF		·
	PST	GGPS Mira Kheel	GGPS Sadiq Abad majol	Surplus/Need Base
23	Sajida Gul PŞT		GGPS Dedar Abad	Surplus/Need base
24		m GGPS Turangzai	\	
\	PST .	Villi	GGPS Shah Dhand	Surplus/Need Bare
25	Mehrin PST	GGPS Gujrano Killi	GGPS Mir Ahmad Gul	Surplus/Need Base
26		GGPS Gujrano Killi	GGPS Shakar Dhand No	1 2010102/11con pag-X7
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1—	ncr	GGPS Pakistan Killi		Surplus/Need Base
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Ì	33 Kausar Parveen	GOPS Nanadi Gui Abi		Surplus/Need Base
	34 Meena Gul	GGPS Nanaqi Cini Zun	GGPS Kara Khan	Surplus/Need Base
		brar GGPS Daulat Pura		

			GGPS Kara Khan	Surplus/Need Base
36	Chazaala Yasmin	GGPS Daulat Pura	OGI-5 Reals Fellow	
1	PST		GGPS Sarwani	Surplus/Need Base
37	Shabina PST	GGPS Kangra		Surplus/Need Base
38	Jaweria PST	GGPS Ambardher	GGPS Haryana	Surplus/Need Base
39	Muhsina Naz PST	GGPS Kharakay	GGPS Bakayana	Surplus/Need Base
40	Farzana PST	GGPS Mathra New	GGPS Battagram No.2	Surplus/Need Base
41	Saima Wahab PST	GGPS Mirzai	GGPS No. 2 Sukhta	
42	Fouzia PST	GGPS Mirzai	GGPS No.2 Sukhta	Surplus/Need Base
43	Samina PST	GGPS Mian Issa	GGPS Mansoka	Surplus/Need Base
44	Nascema PST GGPS Khubai		GGPS Aronda	Surplus/Need Base
45	Ghazala Yasmin	GGPS Gonda	GGPS Hassan Zai	Surplus/Need Base
	Pst .		gong II. ista-d	Surplus/Need Base
46	Asma Pst	GGPS Saifullah Khan killi	GGPS Harichand	
47	Sherin Gul Pst	GGPS Shams Abad	GGPS Mulyano Killi	Surplus/Need Base
48	Asma Begum Pst	GGPS Mulyano Killi	GGPS Saifullah khan killi	Surplus/Need Base
49	Attia Naz Pst	GGPS Jalil Abad	GGPS Aslam Killi	Surplus/Need Base
50	Shazia Hayat Pst	GGPS Behram Dheri	GGPS Sanizo Shah	. Surplus/Need Base
1.30	Kifayat Begum Pst	.GGPS Ray Mahal	GGPS Sadullah Khan	Surplus/Need Base
52	Bas pari Pst	GGPS Akhtyar Abad	GGPS Qilla Tangi	Surplus/Need Base
1 -		_L	, ,	

DISTRICT DUCATION OFFICER (FEMALE) CHARSADDA

Copy for information to the;.

- 1. PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar:
- PA to Director of E&SED Khyber Pakhtunkhwa Peshawar.
- PA to Deputy Commissioner Charsadda.
- PA to District Nazim Charsadda.
- DMO Charsadda.
- B&AO Accounts Branch Local Office Charsadda.
- DAO Charsadda.
- SDEO (F) Charsadda/Tangi/Shabqader with the direction to submit compliance report with in stipulated time.
- ASDEO (F) Circle Concerned.
- 10. ADEO Pry Estab; Local Office.
- 11. Head Mistress Concerned.
- 12. Office File,

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OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICIR (FEMALE) CHARSADDA

The District Accounts Officer, Charsadda .

RELEASE OF PAY

Memo:

Reference this office letter No.348 dated 09-04-2012, DDO (F) Battagram has verified the service documents in r/o Mst. Shama Legum PST transferred from GGPS Pimal Sharif Battagram to GGPS Pegham Koroona District Charsadda, copy enclosed for

It is therefore requested to release her pay please.

b Divisional Education Officer Temale) Charsadda



OFFICE OF THE AGENCY EDUC ATION OFFICER KHYBER AGENCY

NO. __/Verification//FATA to Settle

Dated

13/5/13

To .

The Sub Divisional Educational Officer.

(Female) Charsaddda..

Subject:

VERIFICATION OF APPOINTMENT ORDER.

Memo:

Reference your latter No.2824 dated 22-4-2013 on the subject cited above.

The Appointment order in respect of Mst Shama PST GGPS Aka Khel

Khyber Agency Vide this Office Endst No.2095-2100 Dated 7-5-2003 .

Checked with office record Verified and found correct.

Agenty Education Officer Khyber Agency at Jamrud.

MI

ध्याः 1			
Pers #: 00587391 Buckle: Name: SHAMA BEQUM	CA704	1001 Month 1 -Primary Education	l:January 2014 Female Charsadda Schools
PRIMARY SCHOOL TEACHER CNIC NO.1710184632948	NTN; GPF #		e. Vit
GPF Interest Applied	# DIG #	:	
12 / Vocational Temporary PAYS AND ALLOWANCES.	ķ.	15 13 -	CA7041 _
0001-Basic Pay			
1000-House Rent Allowance	<i>:</i>		9,500.00
1210-Convey Allowance 2005 1300-Medical Allowance	•		1,306.00
1948-Adha- 377		:	. 2,720.00
1948-Adhoc Allowance 2010@ 50%			1,000.00
1970-Adhoc Relief Allow 2011		4 5	1,910.00
2118-Adhoc Relief Allow (2012)		:	573.00
2148-15% Adhod Relief All-2013	•	••	1,900.00
Gross Barrell	• .	:	1,425.00
Gross Pay and Allowances DEDUCTIONS:	•	,	
	4	٠.	20,334.00
GPF Balance 21.036.00	2,693.00	TAX: (3609)	974.00
3501-Benevolent Fund		Subrc:	1,160.00
3511-Addl Group Insurance			180.00
3604-Group Insurance	•	•	13.00
3990-Emp. Edu. Fund KPK		4	115.00
	• • •		T00.00

Total Deductions .

2,542.00

p.o.n *

05.04.1976

LFP Quota: NATIONAL BANK OF 8401-6

10 Years 08 Months 026 Days

(80)

Annex aD



OFFICE OF THE DISTRICT EDUCATION OFFICER (FL

No 10/13

CHARSADDA __dated__23_

2017

Office order

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

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

DISTRICT EDUCATION OFFICER FEMALE CHARSADDA

Endst N

dated

2011

Copy for information

- (1) Registrar Judicial Peshawar high court.
- (2) Director E&SE kpk peshawar.
- (3) Official concerned.

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DISTRICT EDUCATION OFFICER FEMALE CHARSADDA

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AMULX E" . (81

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

S A /2018

Mst Shama Begum

VERSUS

Director of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar and Others

INDEX

·	INDEA	Annex	Pages
S#	Description of Documents	Aunex	1 4600
1.	Grounds of Appeal.		1.6
2.	Affidavit.		7
3.	Addresses of Parties.		.8
4.	Application for Condonation of		9-11
1.	Delay with Affidavit		
5.	Copy of the PTC Certificate	"A, B & C"	12-21
	appointed order and Service		
	book		
6.	Copy of the transferred order	"D & E"	22-23
	and LPC	· · · · · · · · · · · · · · · · · · ·	
7.	Copy of the order and LPC	<u>"F & G"</u>	24-25
8.	Copy of the orders and	"H & I"	26-77
	attendance Register		
9.	Copies of the letters and Payslip	"J, K, & L"	78-80
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11.		"N & O"	82-83
12.	and appellate order		
12.			84
1			

Dated: 30/10/2018

Through

Appellant

Naila Jan

Advocate High Court Peshawar.

Appellant Deposited
Security & Prozess Food

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

/2019

Mst. Shama Begum PST GGPS Pegham Koroona district Charsadda.

Appellant |

VERSUS

- 1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Director Education FATA Khyber Pakhtunkhwa Peshawar
- 3. District Education officer Female Charsadda.
- 4 Agency Education Officer Khyber agency at
- 5. District Education Officer Female Batagram.

Respondents

APPEAL U/S 4 OF **KHYBER** PAKHTUNKHWA SERVICE TRIBUNAL ACT. 1974 AGAINST THE FINAL ORDER DATED: 29/12/2017 COMMUNICATED on 05/10/2018 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT AGAINST THE ORIGINAL ORDER DATED 22/11/2017, WHEREBY SERVICES OF THE APPELLANT DISPENCED, WAS REJECTED WHICH IS AGAINST THE LAW, RULES, PRINCIPLES OF NATURAL JUSTICE, VOID ABINITIO IS

NOT APPLICABLE ON THE RIGHTS OF THE APPELLANT

PRAYERS:-

ON ACCEPTANCE OF THIS APPEAL BOTH
THE IMPUGNED ORDERS DATED 22/11/2017
AND ORDER DATED 29/12/2017 MAY KINDLY
BE SET ASIDE BEING ILLEGAL VOID
ABINITIO AND THE APPELLANT MAY
KINDLY BE REINSTATED INTO SERVICE
WITH ALL BACK BENEFITS.

Respectfully Sheweth,

The appellant submits as under:-

Facts:

- of Pakistan got PTC certificate in the year 1998 and subsequently the appellant was appointed vide order dated 07/05/2003 by Respondent No.4 and was posted at Government girls primary School Akakhel Bara Khyber Agency. (Copy of the PTC Certificate appointed order and Service book are annexed as annexure "A, B, and C")
- 2. That the appellant served the Department with great zeal, zeast enthusiasm, while the appellant was transfered vide order

dated 13/04/2011 from GGPS Akakhel Bara to GGPS Pemall Sharif District Batagram. (Copy of the transferred order and LPC are annexed as annexure "D & E").

- 3. That the appellant after taking charge at the new post of posting at District Batagram performed his duty till transferred order dated 31/08/2011 whereby she was transferred from District Batagram to district Charsadda. (Copy of the order and LPC are annexed as annexure "F & G")
- 4. That after transferred to District Charsadda the appellant served at various Schools with great zeal, zeast. (Copy of the orders and attendance certificate are annexed as annexure "H" & "T")
- of the appellant was verified vide letter No.475 dated 02/04/2013 and Letter No.990/verification/FATA to settle dated 13/05/2013, whereby the agency Education Officer verified the appointment order of the appellant to be



correct. (Copies of the letters and payslips are annexed as annexure "J", "K" & "L")

- 6. That while serving lastly at GGPS Pegham Koroona District Charsadda vide impugned order dated 22/11/2017 services of the appellant was dispense with however the word dispense has neither been mentioned in the Efficiency & Disciplinary Rules 2011 nor did in the Khyber Pakhtunkhwa Civil Servant Act 1973. (Copy of the impugned order is annexed as annexure "M")
- 7. That feeling aggrieved from the order dated 22/11/2017 the appellant filed a departmental appeal before Respondent No.1 which was rejected vide order dated 29/12/2017 however the same was communicated on 05/10/2018. (Copy of the Departmental Appeal and appellate order are annexed as annexure "N & O")
- 8. That feeling aggrieved from both the impugned orders the appellant filing this appeal in the following grounds inter alia:-

GROUNDS:-

- A.That the impugned orders are against the law, rules and, principle of natural justice, hence void abinitio.
- B.That the impugned orders are void which has been passed by DEO Female Charsadda who is not competent authority as the appellant was appointed by the Agency Education Officer. So he is the Competent Authority.
- c. That the punishment of dispensation of service is neither been mentioned in the Efficiency and Disciplinary Rules 2011. Nor did in the Khyber Pakhtunkhwa Civil Servant Act 1973, or any other Law and Rules so on this score alone the impugned orders are liable to be set aside.
- D.That the appellant since her appointment with effect from 2003 till the impugned order served the department and regularly received salaries. So valuable rights of the appellant has been created and the appellant under the principle of locus pententia is entitled for reinstatement.
- E.That the appellant has been subjected to discrimination hence the Respondents violated articles 25 of the constitution of Islamic republic of Pakistan 1973.



F.That the impugned orders are not speaking orders.

- G.That the right of fair Trails has not been provided to the appellant hence violated Act 10-A of the constitution of Islamic Republic of Pakistan 1973.
- H.That no charge sheet, statement of allegation final show cause notice are served upon the appellant. Nor did any regular inquiry was conducted hence the whole proceeding were illegal.
- I. That appellant has not been provided opportunity of personal hearing hence condemn unheard.
- J. That appellant seeks permission of this Hon'ble Tribunal to adduce other grounds during course of arguments.

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

Dated: 30/10/2018

.

Through

Naila Jan

Advocate, High Court

Peshawar.

Appellan

NOTE:

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

Advocate



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. 550/2018

Date of Institution ... 17.04.2018

Date of Decision ... 11.11.2021

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

... (Appellant)

VERSUS

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

(Respondents)

MR. MOHIB JAN SALARZAI, ...

Advocate

MS. NAILA JAN, Advocate .

MR. KABIRULLAH KHATTAK, Additional Advocate General.

MP: SALAH-UD-DIN

MR. ATIQ-UR-REHMAN WAZIR

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

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

For respondents.

MEMBER (JUDÍCIAL)

MEMBER (EXECUTIVE)

<u> JUDGMENT:</u>

SALAH-UD-DIN, MEMBER:-

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

To tribuse

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

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

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

Day.



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

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

appellant was dispensed with; that the same was challenged by the appellant through filing of departmental appeal, which was rejected on 29.02.2017 and communicated to the appellant on 05.10.2018, hence the instant service appeal.

- 5. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellants in their appeals.
- Mr.: Mohib Jan Salarzai, Advocate, representing the appellant in the instant service appeal has contended that the appellant was properly appointed as Drawing Master by the competent Authority upon approval of District Selection Committee; that the appellant has served in various schools and has rendered services in the Education Department for more than 11 years and was also receiving her salary till illegal stoppage of the same by the respondents in the month of January 2017; that the appellant had filed Writ Petition Nó. 2028-P/2017 in the august Peshawar High Court; Peshawar seeking release of her salary; that during the proceedings in the aforementioned Writ Petition, august Peshawar High Court, Peshawar referred the matter to Anti-Corruption Department with the directions to probe into the matter and submit its report, however instead of submitting its report, Circle Officer Anti-Corruption Establishment Charsadda directly registered FIR against the appellant as well as others, which has been challenged through filing of Writ Petition and interim relief has been granted to the appellant; that the departmental Authority has not conducted any inquiry against the appellant and has directly issued the impugned order, whereby services of the appellant were dispensed with by wrongly and illegally mentioning in the column of remarks, that the same was done in light of judgment rendered in Writ Petition No. 2028-P/2017 because the said Writ Petition was dismissed being infructuous; that no regular inquiry was conducted in the matter and the appellant was condemned unheard; that upon transfer of the appellant to various schools, the

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

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

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

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

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

ANNOUNCED 11.11.2021

> (SALAH-UD-DIN) MEMBER (JUDICIAL)

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

ANNOX F

BEFORE THE KHYBER PUKHTUN KHAWA SERVICE TRIBUNAL PESHAWAR .

SUBJECT: Implementation reporte

Memo:

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

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





Office of the District Education Officer Female District Charsadda

0919220086 emischarsadda.deof@yahoo.com

No. 6720 / Dated 20 /01 - 2022

Notification

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

S.No.	Name of teacher	School names
1	Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
2	Mst shama begum Ex-PST	GGPS pigham Charsadda
3 5 14 :	Nighat seema Ex AT	GGHS Dadu killi Charsadda
4	Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda

DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

Endst NO 6 7 2 8 - 4 dated 20 /0/ ____ 2022

Copy for information

(!) PA to director E&SE khber pukhtoon khwa

(2) Mst Nazma Ali Ex-CT GGMSRajjar Charsadda.

(3) Mst Shama begum EX-PST GGPS Pigham'killi Charsadda.

(4) Mst Nighat seema EX-AT GGHS Dadu killi Charsadda.

(5) Mst Zia Gul EX- DM-'GGMS dheri Hameed Mian Charsdda.

(6) office file.

DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA



升、コユ /AD (Lit-li)

Dated Peshawar the ______ / CC /2022

The District Education Officer, (Female) Charsadda.

Subject:

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

Memo:

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

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

ASSISTANT DIRECTOR (LIT: II)

Endst No: _

Dated Peshawar the:

Copy forwarded for information to the:-

1. Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.

2. Principal GHSS Musazia Peshawar.

Deputy District Education Officer (Male) Mohmand.

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

ASSISTANT DIRECTOR (LIT: II)



OFFICE OF THE PRINCIPAL GHSS MOSA ZAI PESHAWAR

•	7	 1.5	 _/Inquiry	Charsa	idda (F

Dated: 42022

Elementary & Secondary Education KP Peshawar,

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

Kindly refer to your office Notification No 469-72 dated 16/3/2022, enclosed please find herewith Inquiry Report consisting of 5 pages and 23 Annexures is submitted to your goodself for further necessary action please.

PRINCIPAL GHSS Mosa zai Peshawai



OFFICE OF THE PRINCIPAL GHSS MOSA ZAI PESHAWAR



N	o <u>フェン</u>	/Inquiry Charsadda (F)		 Dated: スペ	

To

The Director Elementary & Secondary Education KP Peshawar.

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

R/Sir

Kindly refer to your office Notification No 469-72 dated 16/3/2022, enclosed please find herewith Inquiry Report consisting of 5 pages and 23 Annexures is submitted to your goodself for further necessary action please.

Shabeer Ahmad

PRINCIPAL. GHSS Mosa zai Peshawar

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NO RODUCTION:

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

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

Chairman. Member

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

Annexure ---1&2

PROCEEDINGS:

The committee visited the o/o the DEO (F) Charsadda on 31/3/2022 before informing the DEO (F) Charsadda telephonically on 30/3/2022 but it was very sad that she did not bother to attend the committee. However, the Committee was handed over the related record by the Litigation branch.

The DEO (F) Charsadda was requested through a letter No 706 dated 8.4.2022 to be present with all the relevant record along with statement in speaking order and also inform the concerned Ex- Teachers to appear before the committee on 12.4.2022 at the o/o the DEO (F) Annexure --- 03

The DEO (F) Charsadda directed all the following 04 Ex- Teachers to appear before the inquiry committee for personal hearing along with all the relevant record/documents on 12/04/2022 at 09:30 AM at the Office of the DEO (F) Charsadda vide DEO (F) Charsadda letter No. 9388-89 dated 08/04/2022.

i. . Mst. Nazma Ali EX-CT GGMS Rajar Charsadda

- ii. Mst. Shama Begum Ex-PST GGPS Pigham Charsadda
- iii. Mst. Nighat Seema Ex- AT GGHS Dadu Killi Charsadda
- iv. Mst. Zia Gul Ex-DM GGMS Dheri Hamid Mian Charsadda

The letters were dispatched to the Ex-teachers/petitioners on their home address through registry. Annexure -- 05. The Ex-teachers were also informed telephonically one day before on 11/4/2022 regarding their personal hearing on 12/04/2022.

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

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

BACK GROUND & ORIGIN OF THE ISSUE:

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

100

The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar constituted the following committee vide his office Notification No. 469-72 dated 16.03.2022 received on 29.03.2022 to probe as per report of the DEO(F) Charsadda letter No. 8158 dated 03.03.2022 regarding Service Appeal No 1639/2019 titled Mst Nazma Ali, Service Appeal No 1390/2018 titled Mst Shama Begum, Service Appeal No. 1380/2019 titled Nighat Seema and Service Appeal No. 550/2018 titled Zia Begum.

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

Member

❖ , Mr Liaqat Ali (BS-18) DDEO(M) Mohmand

Annexure---- 1&2

PROCEEDINGS:

The committee visited the o/o the DEO(F) Charsadda on 31.03.2022 before informing the DEO (F) Charsadda telephonically on 30.03.2022 but it was very sad that she $di\bar{d}$ not bother to attend the committee. However, the Committee was handed over the related record by the Litigation branch.

The DEO (F) Charsadda was requested through a letter No 706 dated 08.04.2022 to be present with all the relevant record along with statement in speaking order and inform the concerned Ex-Teachers to appear before the Committee on 12.04.2022 at the o/o

the DEO (F) Charsadda.

The DEO(F) Charsadda directed all the following 04 Ex-Teachers to appear before the inquiry committee for personal hearing along with all the relevant record / documents on 12.04.2022 at 09:30 AM at the Office of the DEO (F) Charsadda vide DEO(F) Charsadda letter No. 9388-89 dated 08.04.2022.

Mst Nazmat Ali Ex-CT GGMS Rajar Charsadda.

ii. Mst Shama Begum Ex-PST GGPS Pigham Charsadda.

iii. Mst Nighat Seema Ex-AT GGHS Dadu Killi Charsadda.

Mst Zia Gul Ex-DM GGMS Dheri Hamid Mian Charsadda.

The letters were dispatched to the Ex-Teachers /Petitioners on their home address through registry. Anenxure-05. The Ex-Teachers were also informed telephonically one

day before on 11.04.2022 regarding their personal hearing on 12.04.2022.

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

NAZMA ALI EX-CT CHARSADDA

BACKGROUND & ORIGIN OF THE ISSUE:

That Nazma Ali Ex-CT was dismissed from service on the charge of fake appointment vide DEO(F) Charsadda No. 1508-15 dated 19.07.2019 upon the recommendation of the inquiry report of Miss Naheed Anjum Deputy Directress E&SE Khyber Pakhtunkhwa Peshawar constituted vide No 9749-51 dated 26.10.2018. The origin of the issue was that the DEO(F) Charsadda requested for inquiry after the anti-corruption Charsadda sent a letter to her office on 25.09 2017 regarding detail of the teachers who were transferred from other districts and ex-FATA from 2006 onward. A letter for verification of service documents was again sent to DEO (F) Battagram vide No. 7972 dated 21.07.2017 and reminder for the verification was sent vide No. 18919 dated 03.02,2018. The documents were received duly verified vide DEO (F) Battagram No. 5390 dated 09.03.2018 bearing signatures like the then DEO (F) Battagram Mst Rchana Yasmin. However, the DEO (F) Charsadda was in doubt and she sent the documents for re-verification through email. In reply an email was received from the DEO (F) Battagram in which she told that not only the verification letter was but also the



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

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

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

• The appointment order No. 5509-14 dated 28/01/2011 (District Batagram) is fake and bogus.

Teacher Attendance Register of GGMS Shamlae revealed that she had never been part of that

The salary record was not traceable from Battagram.

Transfer order issued by the Directorate No. 833-38/A-167/2013 dated 01/03/2013 was also not confirmed as the file was missing in the Directorate.

The academic documents provided were also not verified by the institutions concerned.

Verification of all documents also proved fake.

The ministerial staff in the female DEO office are responsible for the loss or non-production of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

FILING OF SERVICE APPEAL IN THE KP SERVIC

She filed service appeal No.1639/2019 Vide Diary No.1767 dated 4/12/2019 before the KP Service Tribunal Peshawar for her re-instatement

The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a de-novo inquiry,

SHAMA BEGUM Ex-PST CHARSADDA

BACK GROUND & ORIGIN OF THE ISSUE:

That Shama Begum was dismissed/dispensed from service vide DEO (F) Charsadda No 10643 dated 22/11/2017 at S# 5 upon the recommendation of the inquiry committee consisting of Mr Muhammad Iqbal BS-19 Principal GHS Badabher District Peshawar and Safdar Khan BS-18 Principal GHS Gulshan Rehman Colony Peshawar which was constituted by the Directorate on the request of the DEO (F) Charsadda Vide her Office No4798 dated 22/6/2017. History of the case was that salary of Mst Shama Beguin Ex-PST GGPS Piagham Charsadda was stopped by the then SDEO (F) Charsadda. Miss Nadia (Present DDEO F Peshawar), for the reason that her appointment order and other relevant documents regarding her services were take as she failed to provide the documents required to the SDEO (F) Charsadda asked vide her office No 219 dated 26/8/2014. That Shama Begum instead of providing the requisite documents to the SDEO concerned knocked at the door of the Honourable Peshawar, High Court against the decision of the SDEO (F) Charsadda of her stoppage Annexure-10 (Dismissal/Dispensed Order) & 11 (Inquiry Report)

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

1) The Agency Education Officer Khyber Agency at Jamrud in his written statement when asked about verification of service documents of Mst Shama Begum Ex-PST GGPS Aka Khel Bara

Khyber Agency furnished the following to the inquiry committee:

The name of the school i.e. GGPS Aka Khel Bara Khyber Agency where the teacher concerned was shown her adjustment on her initial appointment neither exist on the grounds of Khyber Agency nor in the papers of the record of Khyber Agency Education Department i.e. in the SNE of the AEO office of the Khyber Agency.

The bogus signature ridiculously appended to the appointment order of Mst Shama Begum has been resembling to the signature of the Ex-AEO Khyber Agency Mr Dilbar Khan but his period of service has been w.c.f 21/03/2004 to 16/8/2005 as is evident from the AEO display board in theoffice of the AEO.

Mr Jahngi Khan remained the AEO of Khyber Agency for the period w.e.f.01/04/2003

The bogus signature appended to the LPC of Mst Shama Begum was resembling to the signature of Ex-AEO Khyber Agency Mr. Hashim Khan Afridi which did not match with his specimen signature.

No record was available regarding appointment/service/salaries of the teacher

concerned in the office of the AEO Khyber Agency.

The Director Education ex FATA Secretariat Peshawar in his written statement has disown the signature appended to the LPC of the teacher concerned.



The Director E&SE KP Peshawar in his written statement disown the Endst No and signature appended to the transfe orders in r/o Mst Shama Begum bearing No 12085-97/F.No 103/PTC (F) FATA to settle: dated 13/4/2011 and 3464-69/F.No 51/Gen.Tranfer(F) FATA to settle dated 7/9/2011 and further declared that no record was found regarding her transfer either from FATA to District Battagram or from District Battagram to District Charsadda.

During the course of inquiry proceedings this inquiry committee came across many other

anomalies such as:

i. .

The LPC No 975 dated 31/5/2011 prepared for the month of May, 2011 depicts her Basic Pay Rs 3820 per month which is minimum initial of BPS-09 in May 2011.

And the LPC No 129 dated 31/8/2011 prepared for the month of August 2011 depicts ii. her Basic Pay Rs 6200 per month which is minimum initial of BPS-09 in July 2011.

Whereas the page No 06 of her Service Book shows her Basic pay Rs 5200 in May 2011 and the Rs 8480 in the August 2011 which is 6th stage which she might deserve

only after passage of his six long years.

Looking for her own interest to validate her fake services, the teacher concerned driving the nail aright, ultimately succeeded in her fraudulent plan, when in pursuance of the Director E&SE KP Peshawar Endst No 3464-69F.No 51/Gen.Transfer(F) dated 7/9/2011 she was transferred from District Battagram to GGPS Paigham District Charsadda where her pay was started and she claimed and drew her all undue and illegal arrears w.e.f. 31/5/2011 to 01/09/2011 on the basis of fake documents as evident from the page No 07 of her Service Book and pay Roll for the month of June 2011.

She was paid normally up to 30/6/2014 till her pay was stopped by the SDEO (F) Charsadda

for the doubt of fakeness of her basic service documents.

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

FILING OF SERVICE APPEAL IN THE KP SERVICE TRIBUNAL PESHAWAR

She filed service appeal No.1390/2018 Vide Diary No.1585 dated 30/10/2018 before the KP Service Tribunal Peshawar for her re-instatement

The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a de-novo inquiry.

MST. NIGHAT SEEMA EX- AT CHARSADDA

BACK GROUND & ORIGIN OF THE ISSUE:

Mst. Nighat Seema was appointed as AT (BS-09) at GGMS Gidri Khair Abad in Baftagram District allegedly on a fake and bogus appointment letter bearing Enst No.3964-70 dated Annexure --- 12 01/09/2009 by DEO (F) Battagaram.

She was transferred to GGMS Amir Abad Dhaki District Charsadda vide Director E&SE Annexure --- 13 Khyber Pakhtunkhwa Endst No.1766-71 dated 16/11/2012.

The said teacher was re-adjusted at GGHS Dado Killi Vide DEO E&SE Charsadda Endst No. Annexure---14 2486-90 dated 04/12/2012.

. The DEO (F) Charsadda dispensed with the service of Mst. Nighat Seema for allegedly being fake and bogus on 22/11/2017 vide ϕ rder No.10643 (Already attached as Annexure-10)

The said teacher, being aggrieved, submitted a departmental appeal to Director E&SE KP for re-instatement on 20/12/2017.

In response to a letter for verification of appointment order and service record of Mst. Nighat Seema, the DEO (F) Battagram in a letter to Directorate E&SE Khyber Pakhtunkhwa Vide-No.3046 dated 16/07/2019 stated that the said teacher was never employed and there is no record available regarding her service at DEO (F) Battagram. Annexure---16

In the meanwhile, Mst. Nighat Seema (Ex-AT) on rejection of her Departmental Appeal by the competent authority submitted service appeal No.1380/2019 Vide Diary No.1617 dated

08/11/2018 before the KP Service Tribunal Peshawar for her re-instatement.

The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order-by DEO (F) Charsadda dated 22/11/2017 and ordered a fresh regular inquiry.

FINDINGS:-

1. Arabic Teacher (AT) is a District cadre post and a domicile holder of one district is not eligible to apply for the said post in another district in normal circumstances as per rules.

Mst Nighat Seema has no service record at District Battagaram as per DEO (F) Battagaram report. (Already attached as Annexure 14)

3. Mst. Nighat Seema has no salary record at District Battagram.

4. DEO (F) Charsadda has also declared the appointment of Mst. Nighat Seema as fake and bogus.



5. Mr. Adnan B/O Mst Nighat Seema confessed in Court that his sister's appointment letter was fake and bogus. He further stated that Ameen named clerk who was serving at that time in GHS No 1 Peshawar had taken Rs 5.80.000/-from his father and handed over a fake and bogus order.

Annexure—17

MST. ZIA GUL EX-DM CHARSADDA

BACK GROUND & ORIGIN OF THE ISSUE:

- * Mst. Zia Gul of District Charsadda was appointed as DM (BS-09) on allegedly a fake and bogus appointment letter in District Battagram vide Endst No 3505-09 dated 14/03/2006 and was posted at GGMS Thakot Battagram on her appointment.

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

 Battagram

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

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

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

FINDINGS:

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

CONSOLIDATED MAIN FACTS & FINDINGS OF ALL FORDS CASES:

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

(104)

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

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

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

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

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

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

Annexure ---24

The report is submitted for further necessary action please.

Principal

Mosa zai Peshawar

Deputy District Education Officer
(Male) Mohmand

(105)

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

NOTIFICATION.

The Director Elementary & secondary Education Khyber Pakhunkhwa, Peshawar is pleased to constitute the following committee to probe as per DEO Female Charxadda letter No. 8158 dated 3:3.2022

Ar. Shaheer Ahmad Principal (B-19) GHSS Mosazai Peshawar Chairperson

2: Mr. Liagat Ali DDEO Mohmand

Member

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

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. /F. No. Litt-II Charsadda Nazma Ali 18A: 1639/19 Duted 15102/2022

Copy jurgarded to the:-

Mr. Shaheer Ahmad Principal 1B-19) GHSN Mosazai Peshawar (Registered).

Mr. Liaqui, Mi Div. Divinier Education Officer Mohmand (Registered).
District Education Officer (F) Charsadda with the remarks to assist and provide the relevant record to the Inquiry Officer concerned.

PA to Director E&SE Peshawar.

Assistant Director (Female) Elementary & Secondary Education Klyber Fallmunkhwa, Peshawar

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OFFICE OF THE DISTRICT LIDUCATION OFFICER (FEMALE) CHARSADDA. NO. CIRY /DATED/ 53

Immediate Court Matter Case.

The Director, E&SE Govt of Khyber Pakhtunkhwa Peshawar.

ANGELS MARKETAN ARTHURS ... 40 (388) (388 a 182) (4 4 5 7 1 4 6 1 4 7 1 2 1

Michie

Reference to your letter no 12114 dated 11 . 12/2021 on the subject noted above as per your directions this office has filed the QPLA against the subject judgments! As the CPLA has already been filed, your good office is requested by the undersign through letters no 6764-65 dated 21/01/2022 and 7876 dated 21/02/2022. It is once again requested to nominate an inquiry officer at your own level in order to avoid legal complication.

Your good office early response will be highly appreciated please.

DISTRICT EDUCATION OFFICER -(FEMALE) CHARSODA

Endstr.Nø,

Copy to the:.

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

Office file.

DISTRICT FRUCATION OFFICÉR : (FFA(ALE) CHARSDDADA



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

No. 8154/Dated 23/.02.222

Immediate Court Matter Case.

To:

The Director, E&SE Govt of Khyber Pakhtunkhwa Peshawar

Subject: (NIL)

Memo:

Reference to Order letter No. 12114 dated 21.12.2021 on the subject noted above as per your directions this office has filed the CPLA against the subject judgment. As the CPLA has already been filed, your good office is requested by the undersign through letters No 6764-66 dated 21.01.2022 and 7876 dated 21.02.2022. It is once again requested to nominate an inquiry officer at your own level in order to avoid legal complication.

Your good office early response will be highly appreciated please.

DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

	Copy to	the:				•				
- 1.	Section	Officer	litigatio	on (II)	E&SE	Depa	rtment	Khyber	Pakhtu	ınkhv

- Peshawar.

 2. Deputy Director (Legal) E&SE Department Khyber Pakhtunkhwa, Peshawar.
- 3. Office file.

Endst No.

DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA



ATTESTED





FFICE OF THE PRINCIPAL GHSS MUSAZAI PESHAWAR

		-
Vo. 7.7	Charsadda (F١
	 -,	•

Dated:08

The District Education Officer. (Female) Charsadda

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

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

Mr. Shabeer Amad Principal (BS-19)

Chairman

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

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

Shabeer Ahmad .

PRINCIPAL GHSS Musazai Peshawar

OFFICE OF THE DISTRICT EDUCATION OFFICER

, (FEMALE CHARSADDA.

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

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

MEMO

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

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

Incl (Photo copy attached)

Endst NO

DISTRICT EDUCATION OFFICER (FEMALE)CHARSADDA.

Copy forwarded to the

Principal GHSS Musazai Peshawar for information please.

ADEO(litigation)local office.

Office file.

DISTRICT EDUCATION OFFICER (FEMÁLE)CHARSADDA

ATTENDANCE SHEET

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

VENUE: - DISTRICT EDUCATION OFFICER (F) CHARSADDA

Date <u># 12022</u>

(A. T. Him. Acres)

	S.#	NAME OF OFFICER/OFFICIAL	DESIGNATION	CONTACT NO	SIGNATURE
	: i	Jana & Pr Sum	D. S. Cold	0333353655	3 110
: :	- /	V	Cx 1 4		The state of the s
7	13	Regunt Seema	Ex - AT -		Absent
•	24	Zia Gul	Ex- [n]		Abent
. 3	05	Nazma. Ali	Ex. cT		Absent
	06	Shagnifta Rami	# AFE (FIF)		- Dr.
:					

2 July

72/4/

What Infortan

(12)

STATEMENT OF DEO (FEMALE) CHARSADDA.

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

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

DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA



Fice of the District Liucation Ufficer Jemaie District Charsadda

amischarsadda deof@yahon.com æ:.0919220d8ċ

Whereat Mst Nazma Ali CT (BPS-15) GGHS Rajjar r/o Rajjar Charsadda, NOTIFICATION was proceeded under Khyber Pakhtun khwa Govi, serbants (lifficiency and Discipline) Rules 2011, on the charges of Fake Appointment.

2. And whereas the undersigned directed to the accused teachers through notice And whereas the Worthy director E&SE Deptt Khyber Pakhtun khwa Peshawar And whereas the Worthy director E&5E Deptt Khyber Pakhtun khwa Peshawar mitiated/conducted enquiry Vide No. 6751 F. No. 14 (F)/Appeal Charsadda, dated 24-05-2019 against Mst Nazma Ali (CT) through Mst Naheed Anjum Deputy Director Female E&5E Khyber Pukhtoon khwa, Hence the Appointment order of Mst Nazma Ali declared (ake by the enquiry officer with the direction to the DEO (F) Charsadda and declared (ake by the enquiry officer with the direction to the DEO (F) may register an FIR in the Anti Curruption against the said fake teacher and all amount taken as salary may be recovered and refund to Government exchequer,

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

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

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

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

Rajjar Distt Charsadda with immediate effect The DDEO (F) Charsadda already stopped her salary due to having take appointment (Ulfat Beguin)

District Education officer (Female) Charsadda

Endst No. (-1508

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

T. PA to the Director E & S Education Khyber Pakhton khwa Peshaw

PA to the Deputy Commissioner Charsadda.

District Monitoring Officer B & SE Charsadda District Accounts Officers Charsadda

The Concerned DDEO Female Charsadda with the request to recovered the salaries and deposit in Govi. Treasury through Chailan under infimation to this office.

Head teacher GGHS rajjar Charsadda Mat Nazma Ali Ilx Cl' Charsachia...

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

District Editation officer (Female)

EMOR Y JOBLE COP INQUIRY,

EMS OF REFEREN

.....

Prector E&SE Khyber Pakhtunkhwa Peshawar was pleased to nominate the undersigned as enguiry officer under the Notification Endst No. 9749-51/F.NO14/(f) Appeal Charsadda max resh the 26/10/2018 (Annexure-I). CKGROUND:

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

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

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

No. 193 Dated 01/11/2018 (Annexore-VIII) to verify the transfer order of Mst. Nazma from Battagram to Charsadda. In response, vide Letter No 693/F.No.14/Appeal Charsadda Dated Peshawar the 21/12/2018(Annexure-IX) it was replied that the file had been misplaced during shifting of office and the dispatch/issue register was in the custody. of NAB and they did not possess any record pertaining to the transfer in question. The existing dealing assistant of Deputy Director (F) Establishment Directorate of E&SE

Mr. Muhammad Zahir ivas asked vide Lekter Fa. 30 Dated 1/1/2619(Annexure-X)/10 record statement regarding misplacement of the required tile. In reply, he said that the dealing assistant in 2013, was Mr. Munir and that he would be in a better position to resigned (Amexure-XI). Therefore, Mr. Munir Khan, the then dealing assistant was asked vide No 794 Dated 3/1/19(Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education. (Annexure-XIII): So, in those conditions the

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INQUIRY REPORT

TERMS OF REFERENCE

The Director E&SE Khyber Pakhtunkhwa Peshawar was pleased to nominate the undersigned as for inquiry officer under the Notification Endst No. 9749-51/F.No14(F) Appeal Charsadda dated Pesh the 26.10.2018 (Annexure-I)

BACKGROUND

The DEO (F) Charsadda requested the worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa vide letter No. 19585 dated 05.10.2018 to order an inquiry regarding the transfer of Mst Nazma Ali CT from Battagram to Charsadda (Annexure-II).

PROCEDURE:

1. After intimating vide letter No 2048 dated 09.11.2018 (Annexure-III), the undersigned visited the office of the District Education Female, Charsadda on 14.11.2018. She perused and collected all the relevant available record. During the visit of DEO F office, Mst Nazma was also present (Annexure-IV), She

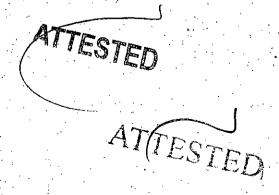
submitted her written statement on the spot.

2. Letter No 195 Dated 01.11.18 and Letter no. 2048 Dated 09.11.18 (Annexure-V & VI) were sent to the District Education Officer (F) Battagram requesting him to direct the dealing hands to attend the office of the undersigned along with all relevant record. He attended the office however, he provided incomplete record. The DEO (F) Battagram was again requested vide Letter No 8609 dated 31.01.2019 (Annexure-VII) and was telephonically contacted as well but the requisite information was not provided.

The Deputy Director (F) Establishment Directorate of E&SE was requested vide letter No 193 dated 01.11.2018 (Annexure VIII) to verify the transfer order of Mst Nazma from battagram to Charsadda. In response, vide letter No 633/F No. 14/Appeal Charsadda dated Peshawar the 21.12.2018 (Annexure-IX) it was replied that the file had been misplaced during shifting of office and

record pertaining to the transfer in question.

4. The existing dealing assistant of Deputy Director (F) Establishment Directorate of E&SE Mr Muhammad Zabir was asked vide letter No 580 dated 1.1.2019 (Annexure-X to record statement regarding misplacement of the required file. In reply, he said that the dealing assistant in 2013 was Mr Munir and that he would be in a better position to response (Annexure-XI). Therefore, Mr Munir Khan, the then dealing assistant was asked vide No. 794 Dated 3.1.19 (Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education (Annexure-XIII). So, in those conditions



quiry officer was unable to retrieve any official record or documents despite issuing

effer to District Education Officer Male Swat was sent vide No. 5265 Dated 11/2018(Annexure-XIV) to direct Mr. Khadim Shah the then Supit Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as the had personally visited the DEO Office Battagram to verify the documents of Mst. Nazma, Statement of Mr. Khadim Simh was recorded (Annexure-XV).

≲rudied the case thoroughly

Reported findings accordingly.

SUMMARY OF THE STATEMENT OF MIST HAZMA

ailed verbal discussion in the office of District Education Officer, Mst Nazma Ali gave ratement in the presence of DEO (F). She stated that sits was appointed in GOHS
District Battagram, vide Endst No5509-14/FB/AE-II/Appointment/2010
11/2011(Annexure-XVI) as a CT without any written test. As CT post was not lying ac GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office order sent No 1385-89 Dated 31/1/2011 (Annexure-XVII). Her husband was posted in After Battagram as a class IV. He belonged to District Charsadda. After four months expect for medical cave but she could not provide any record of Her medical leave to the ed. According to her statement she was transferred to Charsadda vide endorsement No. -17-A-167CT2013 Dated Peshawar the 1/3/2013. She provided charge report in GGMS ten relieving certificate from GGHS Banian, Application for transfer, transfer order, The register of GGMS Shamlai, pay slip along with her written statement (Annexure

<u>FUMMARY OF THE STATEMENT OPMR. MUHAMMAD</u> SUPERINTENDENT BATTAGRAM

the summed Jamid superintendent office of the DEO (F) Battagram visited the office of the narranged ratics on 28/11/2018 and 6/12/2018. He provided incomplete record and only are appointment order of 2011(Annexure-XIX), Photocopy of statements of ACCEPTATIONS OF GGHS Banian and GGMS Shouther (upgraded to high school in June DEO (F) Battagram attendance register of GGMS Shamble (Annexure XX, a, b, c the statement that the name of MST Nazma could neither be found in the refer nor in the attendance register (Annexure-XXI). A Written statement given by ress of GGHS Shamlae saying that, as per the attendance register no teacher on the 1925 found". DEO female in his letter also mentioned that the name of Mist. Nazma are found in any school of Battagram. He provided minutes of DSC meeting in which



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

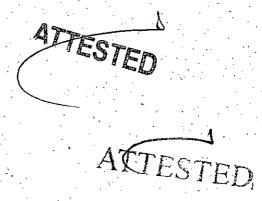
- 5. Letter to District Education Officer Male Swat was sent vide No. 5265 dated 22.11.2018 (Annexure-XIV) to direct Mr Khadim Shah the then Suptt Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as he had personally visited the DEO Office Battagram to verify the documents of Mst Nazma Ali. Statement of Mr Khadim Shah was recorded (Annexure-XV)
- 6. Studied the case thoroughly.
- 7. Reported findings accordingly.

SUMMARY OF THE STATEMENT OF MST NAZMA

(sic) assailed verbal discussion in the office of District Education Officer, Mst Nazma Ali gave her statement in the presence of DEO(F). she stated that she was appointed din GGHS Banian district Battagram, vid Endst No. 5509-14/FB/AE-II/Appointment /2010 dated 21.01.2011 (Annexure XVI) as a CT without any written test. As CT post was not lying in GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office Order advertisement No. 1385-89 dated 31.01.2011 (Annexure XVII). Her husband was posted in _ office Battagram as a Class IV. He belonged to District Charsadda. After four months applied for medical leave but she could not provide any record of Her Medical leave to the undersigned. According to her statement she was transferred to Charsadda vide endorsement No. A-167CT2013 Dated Peshawar the 01.03.2013. She provided charge report in GGMS Banian relieving certificate from GGHS Banian, Application for transfer, transfer order, attendance register of GGMS Shamlai, pay slip along with her written statement (Annexure XVIII). Surprisingly pay slip which she provided name of the school is GHS _

SUMMARY OF THE STATEMENT OF MR MUHAMMAD JAMIL SUPERINTENDENT BATTAGRAM

Mr Muhammad Jamil Superintendent office of the DEO (F) Battagram visited the office of the undersigned twice on 28.11.2018 and 06.12.2018. He provided incomplete record and only (sic) appointment order of 2011 (Annexure XIX) Photocopy of statements of teachers of GGHS Banian and GGMS Shamlae (upgraded to high school in June) DEO (F) Battagram attendance register of GGMS Shamlae (Annexure XX, a,b, c,) (sic) the statement that the name of Mst Nazma could neither be found in the (sic) nor in the attendance register (Annexure XXI). A Written statement given by the head Mistress of GGHS Shamlae saying that, as per the attendance register no teacher, on the attendance was found. DEO female in his letter also mentioned that the name of Mst Nazma (sic) found in any school of Battagram. He provided minutes of DSC meeting in which



total 12 vacant posts,9 posts were recommende (and 3 from open merit, at the ratio of 75% and 25% as per policy that time in vogue. ed/approved to be filled from batch wise list rever 310 candidates were appointed in batch wise quota and 3 from open merit, total 13 vintments were made instead of 12. In the appointment order provided by Mst. Nazma Ali 11 vere enlisted. Alarmingly, the appointment file was incomplete and a transfer file of reperiod was missing in the office of the DEO Battagram, (Annexure XXII a, b)

SUMMARY OF THE STATUMENT SUPERINTENDENT CHARSADDA:

Eshadim Shah recorded his statement and clarified that he visited office of the DEO (F) ragram to verify the service documents of Mst. Nazma by hand on 14/4/2013 and checked all record their but due to absence of DEO (F)Battagram on that day he left the record forandlures/verification. Later on, the verification was sent to DEO (3) Charsadda vide letter no 74/verification Dated 17/4/2015 through post/ Mail. (Annexure-XXIII). He also provided indance certificate signed by the then DDEO Battagram, Mr. Fida Muhammad (Annexure-CIV). It is astonishing that all the record was also signed by the same DDEO but not provided.

FRIGIN OF THE ISSUE:

using visit of DEO (F) Office Charsadda, the DEO female told that she requested for the earling after the anticorruption Charsadda sent a letter to her office on 25/9/17, regarding detail the teachers who were transferred from other districts and FATA from 2006 onward. the reachers who were management from outer distinct and treet from 2000 grands. State with the control of service documents was again sent vide. diser no 7972/Dated 21/10/2017to DEO (F) Battagram. (Annexure-XXVI). Reminder for erification was sent vide endorsement no 18919 dated 3/2/2018. (Annexure-XXVII). The asyments were received duly verified, vide letter no 5390 Dated Battagram the 9/4/2018 earing signatures like the then DEO (F) Battagram MST Rehand Yasmin. (Annexure-XXVIII): DEO Charsadda was worried about fake appointments so, she sent the documents to the (F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) agragian in which she told that not only the verification letter was take but also the dispatch wher on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted District accounts office Battagram verified her LPC vide letter no 174 DAO/BM Dated

<u>Zadinys</u>

From the available record of both the DEO (F) Offices, statement of all people/officials concerned, it is clear that; The appointment order is fake and bogus.

Shirie



Total 12 vacant posts, 9 posts were recommended / approved to be filled from batch wise list (sic) and 3 from open merit, at the ration of 75% and 25% as per policy that time in vogue however, no candidates were appointed in batch wise quota and 3 from open merit, total 13 appointments were made instead of 12. In the appointment order provided by Mst Nazma Ali. If candidates were enlisted. Alarmingly, the appointment file was incomplete and a transfer file of the period was missing in the office of the DEO BAttagram. (Annexure XXII a, b)

SUMMARY OF THE STATEMENT OF MR KHADIM SHAH EX-SUPERINTENDENT CHARSADDA

Khadim Shah recorded his statement and clarified that he visited office of the DEO (F) Battagram to verify the service documents of Mst Nazma by hand on 14.04.2013 and checked all record their but due to absence of DEO (F) Battagram on that day he left the record for signatures / verification. Later on the verification was sent to DEO (F) Charsadda vide letter o 274/verification dated 17.04.2012 through post / Mail. (Annexure XXIII). He also provided attendance certificate signed by the then DDEO Battagram. MR Fida Muhammad Annexure-XXIV. It is astonishing that all the record was also signed by the same DDEO but not provided in hand and sent that through post.

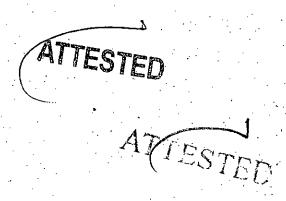
ORIGIN OF THE ISSUE:

During visit of DEO (F) Office Charsadda, the DEO female told that she requested for the enquiry after the anti-corruption Charsadda sent a letter to her office on 25.09.17, regarding detail of the teachers who were transferred from other districts and FATA from 2006 onward. (Annexure XXV), Hence a letter for the verification of service documents was again sent vide letter No 7972/Dated 21.10.2017 to DEO (F) battagram. (Annexure XXVI). Reminder for verification was sent vide endorsement No 18919 dated 03.02.2018. (Annexure XXVII). The documents were received duly verified, vide letter no 5390 dated Battagram the 09.03.2018 bearings signatures like the then DEO (F) Battagram Mst Rehana Yasmin (Annexure XXVIII). The DEO Charsadda was worried about fake appointments so, she sent the documents to the DEO(F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) Battagram in which she told that not only the verification letter was fake but also the dispatch member on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted the District Accounts Office, Battagram verified her LPC vide letter No 174 DAO/BM dated 02.4.2013. (Annexure-XXX a, b)

Findings:

From the available record of both the DEO (F) Offices, statement of all the people / officials concerned, it is clear that:

The appointment order is fake and bogus.



Teacher attendance register of GGMS Shumlac revealed that she had never been a part of that school.

The salary record was not traceable from Battagram.

Transfer order issued by the directorate was also not confirmed as the file was missing in

the directorate.

The academic documents provided were also not verified by the institutions concerned. Verification of all document also proved to be fake.

The ministerial staff in the female DEO office are responsible for the loss or nonproduction of official second. One can only wonder how salary was started without appointment order and verification of academic documents.

The fake appointment order produced by Mst. Nazma may be treated as of no effect and be treated as null and void ab initio. The DEO (F) Charsadda may register a FIR in the Anti-Corruption against the said teacher.

All amount taken as salary may be recovered and refund to government exchequer.

An in-depth inquiry may be initiated against the Ministerial staff of DEO office Battagram and establishment branch in Directorate for their casual handling of the office record and squandering valuable official record pertaining to the appointment./transfer and they should then be proceeded under the Phyben Pakhankinva Government Servants (Efficiency and Discipline) Rules, 2011.

DEO female office Battagram may be directed to bring her house in order, recover the official record office and secure them from 105%.

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

Deputy Director

E&SE Khyber Pakhtunkhwa



LEGIBLE COPY

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

RECOMMENDATIONS:

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

Miss Naheed Anjum Deputy Director E&SE Khyber Pakhtunkhwa





CONTRACT TOTAL ASSAULT LISTER ASSAULT

"M

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMAL

No / 0/2/3:

CHARSADDA dated 28.

2017

Office order

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

į ř-	NAME OF TRACHERS	DESIGNATION	NAMIES SCHOOL	IDEMARKS
- (-	Zia Gul	DM:	GGMS Homocd man dheri Charsudda	Through court Judgment w/p no? 2028/2017, enquiry report.
02	Nighat scenn	AT'	GGHS Dado Killi charsadda	Through verification vide letter No 312 dated 18-01-2017
03	Hasrai PET	PET	GGHS tredend: charsaddu	DG 114.
Tin Tin	Sania wali	SST	GGHS Deulat pura	Vide letter No. 7603 dated 13-10- 2017 send by the DEO (F) to director, response vide letter No. 2630 dated 13-10-2017
A .03	Shama beguni	PST	OOPS pegham koroona charsadda	Through judgment w/p no 4738- p/2016 & enquiry report

DISTRICT EDUCATIONOFFICER FEMALIC CHARSADDA

Endst N______dated

Copy for information

(1) Registrar Judicial Poshawar high court.

(2) Director E&SE kpk peshawar.

(3) Official concerned.

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DISTRICT EDUCATION OFFICER: FEMALE CHARSADDA

2/19/201

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OFFICE OF THE

DISTRICT EDUCATION OFFICER (FEMALE)

CHARSADDA

OFFICE ORDER

In the light of inquiries report & Court Judgments, the appointments of the following teachers are illegal, void ab initio and against the prescribed rules, therefore the services of the following teachers are hereby dispensed, hence they are no more remained teachers.

S	None of the state of	T> ::	log i sa	r
	Name of teachers	Designation	School Names	Remarks
No	,	, , , , , , , , , , , , , , , , , , , ,		
01	Zia Gul	DM	GGMS Hameed Man	Through court
			Dheri Charsadda	judgment w/p No.
			•	2028/2017, enquiry report
02	Nighat Seema	AT .	GGHS Dadi Killi	Through verification
. 2			Charasadda	vide letter No 312 dated
:				18.01.2017
03	Hasrat PET	PET	GGHS Turlan	DG
			Charsadda	
04	Sania Wali	SST	GGHS Daulat Pura	Vide letter BNo 7603
				dated 13.10.2017 send
				by the DEO (F) to
				director, response vide
				letter No 2630 dated
				13.10.2017 ,
∙05	Shama Begum	PST	GGHS Pegham	Through Judgment w/p
-			Koroona Charsadda	No. 4738-P/2016 &
L				enquiry report

DISTRICT EDUCATION OFFICER FEMALE CHARSADDA

		4.					 ,		
Endst No.	•		:			-	•	Dated	 2017
			-	 -			 •	Dateu	 _2017

Copy for information

- (1) Registrar Judicial Peshawar High Court.
- (2) Director E&SE KPK Peshawar.
- (3) Official concerned.



DISTRICT EDUCATION OFFICER FEMALE CHARSADDA

ACTESTED

pursuance of the letter of the District Education Officer (Female) Charsadda bearing Endst p.4798 dated 22/06/2017 the Director Elementary & Secondary Education Khyber publichkhwa Peshawar in his capacity as the appellate authority vide Notification No.2702-03/ F.No.56/(F)/Appeal Charsadda dated 28-07-2017 ordered an Inquiry in respect of Mst. Shama segum PST GGPS Plagham Charsadda to probe the matter with the following TORs.

TERMS OF REFERENCES OF THE INQUIRY:

- $\mathbf{1}_{\mathrm{c}}$. To inquire the $\mathbf{1}^{\mathrm{st}}$ appointment order of the incumbent.
- 2. To verify pay slip/LPC/salaries drawn from FATA/AEO concerned.
- 3. To verify transfer order of the said teacher, made from FATA to district Gatagram and then to district Charsadda along with No Objection Certificate from FATA to district Batagram and from district Batagram to district Charsadda.
- 1. To verify pay slip/LPC/salaries drawn from DAO Batagram and district Charsadda.
- 5. To check thoroughly the Attendance Register of the relevant school of the teacher concerned.

HISTORY OF THE INQUIRY:

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

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

MECHANISIM OF THE INQUIRY:

The following procedure was adopted to conduct the inquiry: . .

- 1. Both the offices of the Director Education FATA Khyber Agency Warsak road Peshawar and the AEO Khyher Agency Jamrud were visited or 11/08/2017 who had already been intimated by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Notification No.2702-03/ F.No.56/(F)/Appress Charsadds dated 28-07-
- The inquiry committee was provided with a written detailed statement regarding the the TORs, by the AEO Khyber Agency Jamrud bearing Memo No.546 dated 11:08-2017.
- signed by the then AEO Khyber Agency Mr. Hashim Khan Afridi, now Director Education 1 FATA Secretariat Peshawar, visited the office of the Director Education FATA Secretariat Peshawar on 16 /08/2017.
- .4. The Inquiry committee was provided with a written statement from the then AEO Khyber Agency now the Director Education FATA Secretariat Peshawar vide Memo No. Nil dated 16-08-2017. (Copy annexed as C)
- S. The inquiry committee, for the purpose to verify the transfer order bearing Endst: 12085-97/F. No. 103/PTC (F) FATA to Sett: dated 13/04/2011 and subsequent. transfer order Endst: No. 3464-69 /F. No. 51/Gen. Transfer (F) dated 07/09/2011, issued by the Director Elementary & Secondary Education NWFP/ Khyber Pukhtunkhwa, ...



NATURE OF THE INQUIRY In pursuance of letter of the District Education Officer (Female) Charsadda earing Endst No 4798 dated 22.06.2017 the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar in his capacity as the appellate authority vide notification No. 2702-03/F No. 56/F/Appeal Charsada dated 28.07.2017 ordered an inquiry in respect of Mst Shama Begum PST GGPS Piagham Charsadda to probe the matter with the following TORs.

TERMS OF REFERENCE OF THE INQUIRY

1. To inquire the 1st appointment order of the incumbent.

2. To verify pay slip /LPC/Salaries drawn from FATA/AEO, concerned.

- 3. To verify transfer order of the said teacher, made from FATA to district Battagram to district then to district Charsadda along with no Objection certificate from FATA to district Battagram and from Battagram to district Charsadda.
- 4. To verify pay slip/LPC/salaries drawn from DAO BAtagram and District Charsadda.
- 5. To check thoroughly the attendance Register of the relevant school of the teacher concerned.

HISTORY OF THE INQUIRY:

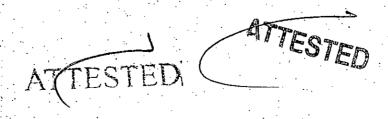
The salary of Mst Shama Begum PSt GGPS Piagham Charsadda had been stopped by the then SDEO(F) Charsadda, Mis Nadia, for the reason that her appointment order and other relevant documents regarding her services were fake as she failed to provide the documents required to SDEO (F) Charsadda asked vide Endst No. 219 dated 26.08.2014. (Copy of letter is annexure A).

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

MECHANISM OF THE INQUIRY:

The following procedure was adopted to conduct the inquiry:

- 1. Both the offices of the Director Education FATA Khyber Agency Warsak Road Peshawar and the AEO Khyber Agency Jamrud were visited on 31.08.2017 who had already been intimated by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Notification No. 2702-03/F No. 56/F/Appeal Charsadda dated 28.07.2017.
- 2. The inquiry Committee was provided with a written detailed statement regarding the TORs by the AEO Khyber Agency Jamrud bearing memo No 546 dated 11.08.2017. (Copy Annexed as B).
- 3. Likewise, the inquiry committee, for the purpose to verify the LPC issued and duly signed by the then AEO Khyber Agency Mr Hashim Khan Afridi, now Director Education FATA Secretariat Peshawar visited the office of the Director Education FATA Secretariat Peshawar on 16.08.2017.
- 4. The inquiry Committee was provided with a written statement from the then AEO Khyber Agency now the Director Education FATA Secretariat Peshawar vide Memo No. Nil dated 16.08.2017. (Copy Annexed as C)
- 5. The inquiry Committee, for the purpose of verify the transfer order bearing Endst: 12085-97/F No. 103/PTC (F) to Sett: dated 13.04.2011 and subsequent transfer order Endst No. 3464-69/F No. 51/Gen Transfer (F) dated 07.09.2011, issued by the Director Elementary & Secondary Education NWFP / Khyber Pakhtunkhwa



Poshawar visited the office of the Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar on 22/08/2017 and made a request for the purpose vide letter No. F312/E. No. Inquiry Dated: 22/08/2017. (Copy annexed as i)

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

FINDINGS AND CONCLUSION OF THE INQUIRY:

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

The AEO Khyper Agency Jamrud in his written statement when asked about verification service documents of Mst. Shama Begum PST GGPS Aka Khel Bara Khyber Agency now PST in GGPS Plagham Charsadda fumished to the inquiry committee has declared that:

(I) The name of the school Le GGPS Aka Khel Bara Khyber Agoncy, where the

- teacher concerned has been shown as adjusted on her initial recruitment, does neither exist on the grounds of Khyber agency nor in the papers of the record of Khyber Agency egucation department i.e. In the SNE of AEO office they be Agency.
- The bogus signature ridiculously appended to the appointment order of Mst. Shama Begum PST has been resembling to the signature of Ex. AFO Khyber Agency Mr. Dilbar Khan but his period of services has been w.e.f 21/03/2004 to 16/08/2005, as Is evident from the AEO display board in the office of AEO.

Mr. Jahngi Khan remained the AEO of Khyber Agency for the period w.e.f.

- The bogus signature appended to the LPC of MSC. Shama Begum PST has a been resembling to the signature of Ex. AEO Khyher Agency Mr. Hashira Khan .. Afridi which did not match with his specimen signature. .
- No record was available regarding appointment/services/salaries of the teacher concerned in the office of the AEO Khyber Agency.
- The Director Education FATA Secretariat Peshawar in his written statement has disowned the signature appended to the LPC of the teacher concerned.
- The Director Elementary & Secondary Education Khyher Pukhtunkhwa Peshawar in his written statement has disowned the Endst: No(S) and signatures appended to the transfer orders in respect of Mst. Shama Begum PST bearing Endst: 12085-97/F. No. 103/PTC (F) FATA to Settle: dated 13/04/2011and Endst: No. 3464-69 /F. No. 51/Gen. Transfer (F) dated 07/09/2011 and further declared that no record was found regarding her transfer either from FATA to district Batagram or from district Batagram.
- During the course of the inquiry proceedings this inquiry committee came across to district Charsadda. many other anomalles such as:-
- (i) The LPC No. 975 dated 31/05/2011 prepared for the month of May 2011 depicts. her basic pay Rs. 3820/- per month which is the minimum/initial of BPS-05 in May
- (ii) And the LPC No. 129 dated 31/08/2011 prepared for the month of August 2011 depicts her basic pay Rs. 6200/- per month which is the minimum/initial of EPS-09 in .
- (iii) Whereas the page No. 06 of her service book shows her basic pay Rs. 5200/- in May 2011 and then Rs. 8480/- in August 2011 which is the 6th stage, which she might describe only accept the passage of six long years

ALCHIOLEGY (FORE)



Peshawar visited the office of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar on 22.08.2017 and made a request for the purpose vide letter No. 1012/F No. inquiry Dated 22.08.2017. (Copy annexed as DI

6. The inquiry committee was provided with a detailed written statement by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, bearing Memo No 4588/F. No. 56(F)/Appeal Charsadda dated 21.08.2017. (Copy annexed as E)

FINDINGS AND CONCLUSION OF THE INQUIRY:

After thorough examination of the available record, detailed written statements of the AEO Khyber, DE-FATA, Director Elementary and Secondary Education KP the inquiry committee furnishes its findings and conclusion as follows:

1. The AEO Khyber Agency Jamrud in his written statement when asked about verification of service documents of Mst Shama Begum PST GGPS Aka Khel Bara Khyber agency now PST in GGPS Piagham Charsadda furnished to the inquiry committee has declared that:

The name of the school i.eGGPS Aka Khel Bara Khyber Agency where the teacher concerned has been shown as adjusted on her initial recruitment, does neither exist on the ground of Khyber Agency nor in the papers of the record of Khyber Agency education department i.e in

the SNE of AEO Office Khyber Agency.

The bogus signature ridiculously appended to the appointment order of (ii)Mst Shama Begum PST has been resembling to the signature of Ex. AEO Khyber Agency Mr Dilbar Khan but his period of services has been w.e.f 21.03.2004 to 16.08.2005, as is evident from the AEO display board in the office of AEO.

Mr Jhangi Khan remained the AEO of Khyber Agency for the period w.e.f (iii)

01.04.2003 to 06.08.2003.

The bogus signature appended to the LPC of Mst Shama Begum PST has been resembling to the signature of Ex.AEO Khyber Agency Mr Hashim Khan Afridi which did not match with his specimen signature.

No record was available regarding appointment / services / salaries of

the teacher concerned in the office of the AEO Khyber Agency.

a. The Director Education FATA Secretariat Peshawar in his written statement has disowned the signature appended to the LPC of the teacher concerned.

2. The Director Education FATA Secretariat Peshawar in his written statement has

disowned the signature appended to the LPC of the teacher concerned.

The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar in his written statement his disowned the Endst No. (S) and signatures appended to the transfer orders in respect of Ms Shama Begum PST bearing AEndst No. 12085-97/F No. 103/PTC (F) FATA to Settle dated 3.04.2011 and Endst No. 3464-69/F No.51/Gen. Transfer (F) dated 07.09.2011 and further declared that no record was found regarding her transfer either from FATA to district Batagram or from district Batagram to district Charsadda.

4. During the course of the inquiry proceedings this inquiry committee came

across many other anomalies such as:-

The LPC No. 975 dated 31.05.2011 prepared for the month of May 2011 depicts her basic pay Rs. 3820/- per month which is the minimum / initial of BPS-05 in May 2011.

And the LPC No. 129 dated 31.08.2011 prepared for the month of August 2011 depicts her basic pay Rs. 6200/- per month which is minimum

initial of BPS-09 in July 2011.

Whereas the page No 06 of her service book shows her basic pay Rs. 5200/- in May 2011 and then Rs. 8480/- in August 2011 which is the 6th stage, which she might deserve only after the passage of six long years.





- Edoking for her own interest to validate her fake services, the teacher concerned, driving the nail aright, ultimately succeeded in her fraudulent plan, when in pursyance of the Director Elementary & Secondary Education Khyber Pukhtunkhwa Poshawar Endst: No. 3464-69/F. No. 51/Gen. Transfer (F) dated 07/09/2011 she was transferred from district Batagram to GGPS Palgham district Charsadda where her pay has been started and she has claimed and drawn her all undue and Illegal arrears w.e.f 01/09/2011 to 31/05/2011 on the basis of fake documents as evident from the page No. 07 of her service book and pay roll for the month of June 2011.
- She has been paid normally up to 30/06/2014 till her pay has been stopped by the then SDEO (F) Charsadda for the doubt of fakeness of her basic service documents.
- The worthwhile step of stoppage of monthly salaries of Mst. Shama Begum PST by SDEO Charsadda la worth commendable and appreciable. Had the DEO (F): Charsadda lodged an FIR against the bogus teacher in the police station concerned after conducting an inquiry in the instant case, for the reason that Mist. Shama Begum PST is not a civil servant to be proceeded under any rules of law meant for
- disciplinary proceedings against a civil servant?

 The basic documents which determine the entire services as fair/fake of a teacher are his/her first appointment order, medical report, LPCs, entries in the service book, transfer orders and other similar tecord and in the case of the teacher concerned it has been proved beyond any doubt that all these documents were found take and bogus. She has been inducted in the educational system with the
- The committee is of the dpinion that further investigation in the instant case is needed in term of reference to fix the responsibility upon her facilitators who were the essential part of this froudulent plan other than the teacher concerned which may need a detailed inquiry.

RECOMMENDATIONS OF THE INQUIRY:

In view of the above submissions it is recommended that:

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

(SAFDAR KHAN)

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

(Inquiry Officer)

IMUHAMMAD IQBAL) PRINCIPAL BPS-19 GOVT: HIGH SCHOOL BADHBER PESHAWAR Chairman induny Committee



- 5. Looking for her own interest to validate her fake services, the teacher concerned during the nail aright, ultimately succeeded in her fraudulent plan, when in pursuance of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Endst No. 3464-69/F No. 51/Gen Tranfer (F) dated 07.09.2011 site was transferred from district Batagram to GGPS Piagham district Charsadda where her pay has been started and she has claimed and drawn her all undue and illegal arrears w.e.f 01.09.2011 to 31.05.2011 on the basis of fake documents as evident from the page nO 07 of her service book and pay roll for the month of June 2011.
- 6. She has been paid normally up to 30.06.2014 till her pay has been stopped by the then SDEO (F) Charsadda for the doubt of fakeness of her basic service documents.
- 7. The worthwhile step of stoppage of monthly salaries of MSt Sama Begum PST by SDEO Charsadda is worth commendable and appreciable. Had the DEO (F) Charsadda lodged an FIR against the bogus teacher in the police station concerned after conducting an Inquiry in the instant case, for the reason that Mst Shama Begum PST is not a civil servant to be proceeded under any rules of law mean for disciplinary proceedings against the a Civil servant?
- 8. The basic documents which determine the entire services as fair / fake of a teacher are his / her first appointment order, medical report; LPCs entries in the service book, transfer orders and other similar record and in the case of the teacher concerned it has been proved beyond any doubt that all these documents were found fake and bogus. She has been inducted in the educational system with the connivance of the active MAFIA.
- 9. The committee is of the opinion that further investigation in the instant case is needed in term of reference to fix the responsibility upon her facilitators who were the essential part of this fraudulent plan other than the teacher concerned which may need a detailed inquiry.

RECOMMENDATIONS OF THE INQUIRY:

In view of the above submissions it is recommended that:

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





OFFICE OF THE EXECUTIVE DISTRICT OFFICER (EASE) BATTAGRAM. APPOINTMENT ORDER Consequent upon the approval of competent authority that Mist Nighat Seems D/O Rac Multermad is hereby appointed as A.T is. Gert Cirla Middle School, Gidri Schair Misd Banageau in BPS 109 sepaints vacant part plus tunni altowances as admissible under the rule in the interior of public service with effect from the date of her taking over charge. AMBHUS & COMPRIMINES She will be governed by such times of regulation as may be prescribed by the Gove from time to time for category of the Dove, Servant to which he belong in time to time for category of the Dove, Servant to which he belong in time of realization print solve of our month should be given by the official anneaned otherwise one month pay following will be fortisted in the thereof. Her original Conference should be the the dead and verified from the conversed Heroticial concerned one before handing taking over charge by the DDO concerned through Agreety Education Officer concerned.

She declaration of assets should be obtained and kept in sufe custody by the DDO concerned. She take over charge of her post with in occ month after the issue of this appointment.

She take over charge of her post with in occ month after the issue of this appointment,

order

Charge reports should be sent to all concerned.

NO TA/DA etc is allowed. EXECUTIVE DISTRICT OFFICER FLE & SECY EDIT BATTAGRAM Dated Up of Princo. Endsi No. 75/16_70/ABVEND (F). (Spry forwarded for information of accreasely action to the P.S. to DCO Boungrum.
District Accounts Officer concerned.
District Accounts Officer concerned.
Candidate concerned. DETRICT OF ICSR(FEMALE) PLUS SECVEDIT BATTAGRAM Continues of CERTIFIED TO DE TRUE COPY. F5.111 Fortid I Charge of Advanced of Supraint De La Constantion



OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) BATTAGRAM

APPOINTMENT ORDER

Consequent upon the approval of competent authority that Mst Nighat Seema D/o Raz Muhammad is hereby appointed as AT by Govt Girls Middle School, Gidri Khair Abad Battagram in BPS 09 against vacant post plus usual allowances as admissible under the rule in the interest of Public service with effect from the date of her taking over charge.

TERMS AND CONDITIONS:

1. She will be governed such rules & regulations as may be prescribed by the Govt from time to time for category of the Govt Servant to which he belong.

2. In case of resignation prior notice of one month should be given by the official concerned otherwise one month pay allowances will be forfeited to lieu thereof. Her original certificate / degrees should be checked and verified from the concerned BISE/ University concerned etc before handing taking over charge by the DDO concerned through Agency Education Officer concerned.

3. She declaration of assets should be obtained and kept in safe custody by the DDO concerned.

4. She take over charge of her post within one month after the issue of this appointment order.

5. Charge reports should be sent to all concerned.

6. No TA/DA etc is allowed.

EXECUTIVE DISTRICT OFFICER
ELE&SECY EDU BATTAGRAM

Endst No. 3964-70/AT/Estb (F)

Dated 01.09,2009

Copy forwarded for information & necessary action to the:

1. PS to DCO Battagram

2. District Account Officer concerned.

3. Distt Officer Female concerned.

4. Candidate concerned

5. Personal file

DISTRICT OFFICER (FEMALE) ELE&SECY EDU BATTAGRAM



OFFICE ORDER. Consequent upon ban relaxation by the computent notherity, Mst. Nighat : Section (A1) CHMS Code, Kinamond District Hadage in is hereby transferred/adjusted against the walling post of (AT) at GGMS Amir Abod Dakes a water Charsoddiff on her own pay & BPS in the mesest of public servine with effect from the that of nor making over charge. Charge report should be submitted to all concerned.

No TADA etc are allowed.

The EDO concerned is directed to check her original service documents before making payment of salary.

Her Seniority will be determined as per rules/policy. 2. J. DIRECTOR ELEMENTARY & SECY; EDUCATION KHYBER PAKHTUNKHWA Jr. Bosto II Vol-5 Transfort FR. P. Duted Pesh; the 16 / 11 /2012 Copy of the above is to there Executive Dissact Officer (E&SE) Balancian of Charsadda [1] District Accounts Officers Battagram & Charsadda. reactor consumed. Dentify Directress (Erlab)
Elementary & Secondary Education Khyber Fakhtunkhwa, Peshawar

OFFICE ORDER Mstt: Nighal Seema AT GGMS Glart Khair Abad District Battagram under transferred to GGMS Amir Ahad Dhakkl is hereby posted at GGHS Dado Killi against the vacant post AT on her own we grade in the interest of public service with immediate effect. Note:-No TAIDA is allowed Charge report should be submitted to all conce MITA ULLAH KHAN) ULTVE DISTRICT OFFICER EASH CHARSADDA /Dated Charsadda the Endsu No._ Copy for Information & Necessure action to the: District Account Office Charsaddu Head Mistress Concloraed Accountant Local Office ADO B&Mupdit: Local Office Official Concerned Office File TASE CHARSADD MASSA A. C.

یخفور جناب سیمرٹری ایجو پیشن صاحب خیبر پختونخوا، بیشا در ا محکمان مائیل/درخواسیا

لاندا میری آپ حضور سے استدعا ہے کہ تھم بر خاشگ المجھٹی نمبر 10643 ، مور در 22.1،1.2017 کومنسوخ فرما کر بھے اپنے پوسٹ پر بیال کیا جائے۔

عرضی تابهت سیما دلید دازمجه ساکن نور بهار کالونی نمبر 1 ، جارسده - (سائله) مومال نمبر 9884 189 - 0321

March

mund Marine





OFFICE OF THE

DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM

(Phone # 0997-310460)

E-mail: demisibattagram@yahoo.com

The Director #

Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar.

Subject:

SUBMISSION OF REPORT IN RESPECT OF FAKE EMPLOYEES

Kirdly refer to the subject noted above it is stated that all the record in this Метю . office/school have been checked and no record found in respect of Mst. Zia Gut.OM appeal. No. 550/2018, Mst. Nighat Seema AT GGMS Khairabad Appeal No. 1350/2018 and Mst. Shama Begum PST GGPS Palmal Shareef, it is concluded that these teachers have never been employed in the styength of this office.

The report is hereby submitted for onward submission

√11 Baktagram

Endstt No. As above

Copy for information to the:

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

District Education Officer (F) Battagram

questi

BETTER COPY OF PAGE WO. IN THE COURT OF HAMID KAMAL, JUDICAL MAGISTRATE-IV, CHARSADDA

(127)

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

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

Stated that Mst Nighat Scema female teacher (AT) is my sister. After passing her matric examination and she continued her study in Madrassa Ayisha Lilbanat which is registered with Wifaqul Madaras and obtained her Shuhadat-e-Anila degree which is equal o Master degree in Islamiat. After education , she and my father were search of government sevice, when my father met with one Ameen Clerk at Government High school No.01 Peshawar, who took 5,80,000/- from my father for getting employment for my sister in education department, who handed over employment order No. 3964-70 dured 01.09.2009 to my father for appointment at as AT at District Battagram and then transferred her to District, charsadda Vide transfer order No.1765-7 dated 16.11.2012 and after that my sister was performing her duties as AT teacher in Government Middle School Dady killy, which is now upgard High school. As all the above dealing was made in my presence, therefore. I know about the fact, in proof thereof I produce a photostate chit in which all the detail is mentioned and bears my father's signature. Now my father is dead and through this inquiry I came to know that the above said Ameen Clerk has committed fraud with us and handed bver to us a bogus and fake appointment & transfer order. As other person/staff was 'also involed in the said fraud, therefore, I charge the clerk Ameen alongwith other staff members and prayed for justice

XX... Nil opportunity given.

RO & AC

03.10.2017

Adman

NIC No 17101-5729337-5

(Hamid Kamal) Judicial Magistrate-IV Charsadda

Millian Committee of the Committee of th

Suprement after seek a syst



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA

OFFICE ORDER

Consequent upon the approval of the competent authority Mst Nighat Seema of GGMS Gidr Khairabad District Hangu is hereby transferred / adjusted against the vacant post of AT at GGMS Amir Abad Dakki District Charsadda on his own pay and BPS in the interest of Public service with effect from the date of his taking over charge.

Note:-

- 1. Charge report should be sent to all concerned.
- 2. NO TA/DA etc are allowed.
- 3. The DEO (Female) Charsadda is directed to check all service documents before the release of pay.
- 4. Her seniority will be determined as per rules / policy.

Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Endst No. 1766-71/F No. 16/Vol5 Transfer(F) KP Dated Peshawar the 16.11.2012

Copy for information to the:

- 1. Executive District Officer (E&S) Battagram Charsadda
- 2. District Accounts Officer Charsadda / battagram.
- 3. Principal concerned.
- 4. Teacher concerned
- 5. PA to Director Local Directorate
- 6. M/File.

Deputy Director (Estb)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

ATTESTED ATTESTED

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ISCHOOLS & UTHER TO BATTAGRAM

APPOINTMENT
Consequent Upon the Approval of the District Selection Committee, Bottograph the following of the Consequent Upon the Approval of the District Selection Committee and Bash NO-09, Plus usual content of the Consequent of the Selection Committee of District Indian Opposition of District Indian Opposition of District Indian Opposition of District Indian Opposition Opposition of Production Opposition O Agolrisi V/Post Against V/Post zia Gul

Immis_Consilions.

Charge reposts should be submitted to all concerned.

They are antitled to fiel oil benefits as admissible under this rules in styll servant Act compt dension. They should have be entitled to receive such amount occurrenced by them toward the contributory provided fund along with contributions made by the postulants government to their accounts to the study of the postulants government to their accounts to the study of the postulants are contributed to receive their straight of their study of the standard of their study of their standard of their straight of their standard of thei

been received by the concernor.

Their services will be liable to termination on an month notice, the one month pay shall be terfolted to the Govt.

Her one month pay shall be terfolted to the Govt.

Her one month pay shall be terfolted to the Govt.

Her one month pay shall be terfolted to the Govt.

Her concludes are required to produced Age and Health certificate from the social and the pay to the bound of the production of the pays of the brace of this order. Otherwise appoint and government will get salaries against the sometioned posts in the Budget.

The Appointment will get salaries against the sometioned posts in the Budget.

The Appointment will get salaries against the sometioned posts in the Concerned. The post of the Concerned that the pays the pays the DOC concerned. Personally/By hand unitersities/Boards/Institution on their was expansed by the DOC concerned. Personally/By hand yerification with not be acceptable.

(Mukhtar Ahmud Swali) Executive Dunier Officer Schools & Literacy Battogram.

Dated Battegram the 1915/06. Ends!; No. 3505 - 0 | JEBIAE-MAPPTI Galed B. Coux Johnson de Jorialamallon & necassary action la Their

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OFFICE OF THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
RHYBER PARHIOON KHAWA, PESHAWAR.
Consequent upon the approval of the companyon of the sparroyal of the companyon. Consequent upon the approval of the competent authority, Mst Zia Gul DM at GGMS, Shalian (Manshera) is hereby transferred to GUNIS, Dher, Harnid Mian Charkadan, ragainst vacant past of DM on her own pay and DPS in the interest of Fublic Service with effect from the date of his taking over charge. Charge report should be sent to all concerned. The EDO (ERSE) concerned is directed to check her original service documents before making payment of solary.

Her Seniority list will be determined under the rule. Endst No 3655-60/F No. 134/1/Dist Trst;

Copy forwarded for information to the:

Executive

DIRECTRESS

DIRECTRESS

SECONDARY

ELEMENTARY SECONDARY

ELEMENTARY SECONDARY

ELEMENTARY SECONDARY

EDU KHYGER PAKHTUN KRIAWA PESHAWAR

EDU KHYGER PAKHTUN KRIAWAR

EDU KHYGER PAKHTUN KRIAWA Executive District Officer (E&SE) Munshera/Charsaida.

District Accounts Officer Manshera/Charsaida.

Headmistress Concerned.

Teacher Concerned. Headinistiess
Teacher Concerned
P-A to Director (E&SE) Khyber Fakhtun Khawa Peshawa Deputy Directress (Estab) (EASE) Khyber Pakhtun

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER

Consequent upon the approval of the competent authority Mst Zia Gul DM at GGMS Shalian Mansehra is hereby transferred to GGMS Dheri Hamid Mian Charsadda against vacant post of DM on her own pay and BPS in interest of Public Service with effect from the date of his taking over charge.

Note:-

- 1. Charge report should be sent to all concerned.
- 2. NO TA/DA etc are allowed.
- 3. The DEO (Female) Charsadda is directed to check all service documents before the release of pay.
- 4. Her seniority will be determined as per rules / policy.

Directress Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Endst No. 3655-60/F No. 130/I/Dist Trsl:

Dated Peshawar the 27.01.2011

Copy for information to the:

- 1. Executive District Officer (E&S) Battagram Charsadda
- 2. District Accounts Officer Charsadda / battagram.
- 3. DDO (F) concerned
- 4. Official concerned.
- 5. Master File
- 6. PA to Director Local Directorate

Deputy Directress (Estb)
(E&SE) Khyber Pakhtunkhwa,
Peshawar



Vide Notification Ender No Alen 86 dated 25/09/2017 [P/A) Mr. Jehanely vide Notification Endst No. 4184,86 dated 25493 2017 (I/A), Nr. Jenanell Principal Government Shaheed Opana Zafar CMHS No. 7 Peshawar, as Co-with Mr. Khizar Hayar, Santo Sabier Specialist GHSS No. 4 Peshawar, as Co-with Mr. Khizar Hayar, Santo Sabier Familier Santo Mer. 71a Gul oresentive pated member are altricoherent franchist English Santo Mer. 71a Gul oresentive pated member are altricoherent franchist. WITH INT. NILLER THEY RESERVED AND A CHEMINES THE GUI Presently.

Opted member are authorized to go and a control of the contr working as DN at GGMS Dater Kameed Man District Assada regarding her Mst. Zia Gul Submitted her Service Book vide which she has been appointed as DM id PPS-09 at GGMS Thaket District Battagram against vecant in appointed as DM id PPS-09 at GGMS Thaket District Battagram against vecant in appointed as DM id PPS-09 at GGMS Thaket District Battagram and the basis of BA 2° division of PAS boost vide EDO(SEE) Battagram Enust No 1819-22 dated of PAS subsequently she has been allowed BPS-15 on the basis of up gradation of PAS well IDS-03-2005 vide EDO(SEE) Battagram Enust No 1819-22 dated of PAS well IDS-03-2005 vide EDO(SEE) Battagram, Later on the has verified well IDS-03-2006 to 30/11/2007 from the Scottagram, Later on the has been in 10-2007 Service ventiled Well 15/03/2006 to 30/10/2009. Her iservice some been transferred to GGMS Menhandri (Mansehra) on 01/10/2009 from the Acquaintance Roll and other record on 30/11/2009 from the Acquaintance Battagram been transferred to GGMS Menhandri (Mansehra) ERS Education Battagram venticed well 01/12/2007 to 30/11/2009 from the Acquaintance from this office of District Officer (Fernale) ERS Education from the venticed well of the Color of C Mst. Zla Gul Submitted The Service Book vide which she has been impiter of fake documents, Back Ribund record from this office of District Officer (Female) 88.5 Education Battagram.

While her service also venified when the District Officer (Female) School & Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other record from the District Officer (Female) as Acquaintance Roll & other Roll & Acquaintance Roll & other report from the District Officer (Femile) School & 1212 days (Neaver Mansehra In addition w.e. (FOL/08/2010 to 18/01/2010 (212 days (Neaver Mansehra In addition w.e. (FOL/08/2010 to 18/01/2010 (212 days (Neaver Mansehra In addition w.e. (FOL/08/2010 to 18/01/2010 (19/08/2010 to 18/01/2010 (19/08/2010 to 18/01/2010 to 18/01/2010 (19/08/2010 to 18/01/2010 to 18/01/2010 (19/08/2010 to 18/01/2010 to 18/01/2010 to 18/01/2010 (19/08/2010 to 18/01/2010 to without pay was sanctioned vide EDO EREC Mansafra under Endst No. 3565-66 dated 14/03/2011. At last she has been transferred to GGMs. Dheri Hameed dated 14/03/2011. At last she has been transferred to GGMs. Dheri Charcodda Mian Distr Charsadda Vide sheet No. 3565-66 dated 14/03/2012. At last she has been transferred to GGIMS Oher Hameed

Mian Distr Charsadda Vide Endst No. 3655:60 F.No. 134/F/Distr Charsadda

Osted 27/10/2013 Till Hate endst moreling at One Section (1997) Mian Distr Charsadda Vide Endst No. 3655-60°F.No. 134/F/Distr Charsadda Dheri Dated 27/10/2011 Till date she is working as DM at the very school i.e Dheri Hameed Mian Cist Charsaddi. The undersigned along with Mr. Khizar Hayat senior Subject Specialist No.4 Peshawari as Co-opted member visited office of the District Education Proceedings. Officer (F) ESSE Battagram 8 Wansehra on 25-26/09/2017. The matter was discussed with DEO (Female) Battagram and concerned staff. Record pertaining discussed with DEDIN emale) Battagram and concerned stati. Regula per tahung to appointment siders of the period 2006 with regards to DM appointment siders of the period 2006 with regards to DM appointment siders of the period 2006 with regards to DM appointment and the DM appointment and Examined and discussed with the concerned staff, the succession said the then Examined and distressed with the contestined start has was called upon by the District Officer 1 amale) school and Literacy Battagram was called upon by the



ENQUIRY REPORT

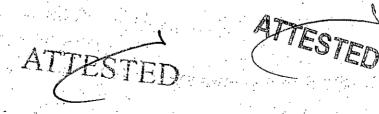
Vide notification Endst NI. 4184-86 dated 25.09.2017 (P/A) Mr Jehangir Principal Government Shaheed Qsama Zafar CMHSS No 2 Peshawar City along with Mr Kizar Hayat Senior Subject Specialist GHSS NO 4 Peshawar, as Co0working as DIV at GGMS Dehri Hameed Mian Distt Charsadda regarding her matter of fake documents.

BACKGROUND

Mst Zia Gul submitted her service Book vide which she has been appointed as DM in BPS-09 at GGMS Thakot District Battagram against vacant post vide EDO)S&L) Battagram Endst No 3505-09 dated 14.03.2006. subsequently she has been allowed to BPS-14 on the basis of BA 2nd Division w.e.f 15.03.2006 vide EDO(S&E) Battagram Endst No 1819-22 dated 10.05.2006. Further she has been allowed BPS-15 on the basis of up gradation of BOS from 01.10.2007. Service verified w.e.f 15.08.2006 to 30.11.2007 from the acquaintance Roll and other record of the EDO (S&L) Battagram. Later on she has been transferred to GGMS Mohandri (Mansehra) on 01.10.2009. her service verified w.e.f 01.12.2007 to 30.11.2009 from the acquaintance Roll & other record from the office of District Officer (Female) E&S Education Battagram. While her service also verified w.e.f 01.10.2009 to 30.11.2009 from the literacy Mansehra. In addition w.e.f 01.08.2010 to 18.02.2011 (212 days) leave without oay was sanctioned vide EDI E&SE Mansehra under Endst No. 3965-66 dated 14.03.2011. At least she has been transferred to GGMS Dheri Hameed Mian Distt Charsadda bide Endst No. 3655-60 F No. 134/F/Distt Charsadda dated 27.10.2011. Till date she is working as DM at The very school i.e Dheri Hameed Mian Distt Charsadda.

Proceedings:

The undersigned along with Mr Khizar Hayat senor subject specialist No 4 Peshawar as Co opted member visited office of the District Education Officer (F) E&SE Battagram & Mansehra on 25-26.09.2017. The matter was discussed with DEO (Female) Batagram and concerned staff. Record pertaining to appointment orders of the priod 2006 with regards to Dm appointments was examined and discussed with the concerned staff Mr Wasiq Sadi, the then District Officer (Female) school and literacy Battagram was called upon by the



undersigned at the pilice of DEO (Female) Battagram, He was presented original undersigned at the prince of the Genaule) battagram, He was presented original appointment order and service Gook of Mast Zia Gul (F/B). Mr. Wasig Sald flatly deplet the second of the appointment order she service Book of Mst. (La Gul (F/B) .Mr. washes had in the denied his signatures on the appointment order as well as entries made in the denied his signatures on the appointment order as well as entries in add in the denied his signatures of the appointment order as well as entries in add in the denied his signatures of the appointment order as well as entries in add in the denied his signatures on the appointment order as well as final leading in his Service Book of Mat 218 Gul.

Service Book of Mat 218 Gul.

M. Wasiq said that then District Officer (F) Sec pistrict Battagram In his order Mi. Wasiq said the then blathet Officer (F) Sat District Battagram in his written statement (F/C) termed that algorithmed with appointment or his as well as service book lightfous; He appended this arredmen standards in his written statement as well. In addition nothing was found regarding appointment of Mst. Zia Gul as In adultion nothing was found regarding appointment of Mst. Zia Gul as DM at GGMS Takot Battagram, Further Teacher Artendance Register GGMS DM at GGMS Takor paragram, Further Teacher Attendance Register GGMS was Takor paragram, Further Teacher Attendance Register 2009 was to November, 2009 was aken Battagram, of the Regiod September 7006 to attendance of Zia Gul as examined in prignal Copy attached) (F/D) where in attendance of Zia Gul as examined in prignal Copy attached) (F/D) where in attendance live live is attendance book i.e. (w.e.f. 15-03-05) and the service book i.e. (w.e.f. 15-03-05) is not verified for the Service live in the service book i.e. (w.e.f. 15-03-05). Written statement as well. examined in priginal (copy attached) (F/D) where in attendance of Zia Gui as DAM is not verified for the period claimed in the service book i.e (w.e.f. 15-03-20M is not verified for the sains period as partagram has no 2006 to 30-2+-2009. Her sains record of district Battagram and at prima facie seems whereabouts as cer office record of district Battagram and at prima facie. 2006 to 30-24-2009. Her salary too for the same period as Battagram has no whereabouts as periorfice record of district Battagram and at prima facie seems that salary has not drawn that salary has not drawn that salary has not drawn to the control of the same of the control o muereaponts as bei guite Lecold of period weightigged above The understaned also wasted office of the people. Mansahra 2- The understaned also visited office of the Deoliff Mansahra on 26/9/2017 Office record regarding Mst 21a Gul was sentched by the contemped of the provider 26/9/2017 Office record regarding Met Zia Gui Was senrched by the conterned relevant staff But nothing was found to safeting inter District Transfer or not relevant staff But nothing was found to safeting in the content of the cont relevant staff But nothing was found regarding inter District Transfer order etc of Mat 21a Cul. It ments considerables that salary for the period November 2009 MAST Ziu. Gul in her written statement (P/F) commented that in response of Mat Zia Gul. It merits consider accit than sehra (F/E) to advertisement the applied for the post of DM at District Battagram. She took written test securing A8 marks 60% of 50 and also appeared for interview, on the basis of which selected and took charge of DIM at GONS Taket District Battagram and received salary for about 2 years but did not provide any supporting the received salary for about 2 years but did not provide any supporting DEO (E) Barrageam vide (E/2) confirmed that office record regarding the applinment of Mst-Zia Gui is allent and may be considered as take and bogus documents in this regard. t of Mst Zia Gui is silent and to Manager and whole documentation on and the Manager and the M DEO (E) Wansema vide (F/H) asserted that whole documentation on the District of GGMS Mohandri and Mari Dollar of Charadda (Sakkaand Sages) TERTIFIED TO ME TRUE COMM

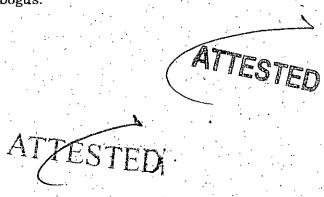
the state of the s

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

Mr Wasiq said the then District Officer (F) S&L District Battagram in his written statement (F/C) termed that signatures made on the appointment order as well as service Book fictitious his specimen signatures in his written statements as well.

In additional nothing was found regarding appointment of Mst Zia Gul as DM at GGMS Takot Battagram. Further Teacher attendance register GGMS Takot Battagram of the period September 2006 to November 2009 was examined in original (copy attached) F/D where intendance of Zia Gul as DM is not verified for the period claimed in the service book i.e (w.e.f 15.03.2006 to 30.11.2009). her salary too for the same period as Battagram has no where about as per office record of district Battagram and at prima facie seems that salary has not drawn for the period mentioned above.

- 2- The undersigned also visited office of the DEO (F) Manseha on 26.09.2017 office record regarding Mst Zia Gul was searched by the concerned relevant staff but nothing was found regarding inter District Transfer order etc of Mst Zia Gul. It merits consideration that salary for the period November 2009 to July 2010 was drawn at District Mansehra (F/F)
- 3- Mst Zia Gul in her written statement (F/F) commented that in response of advertisement she applied for the post of DM at District Battagram. She took written test securing 48 marks out of 50 and also appeared for interview, on the basis of weih selected and took charge of DM at GGMS Takot District Battagram and received salary for about 2 years but did not provide any supporting documents in this regard.
- 4- DEO (F) Battagram vide (F/G) confirmed that office record regarding the appointment of Mst Zia Gul is silent and may be considered as fake and bogus
- 5- DEO (F) Mansehra vide (F/H) asserted that whole documentation on behalf of this office from her transfer to this District at GGMS Mohandri and onward to district Charsadda is fake and bogus.



Findings

- Appointment Order of Mist Zie Gul, as DM at GGMS Taket District Battagram is take and bogus as pen record of the office of DEO (F)
- Dattagram). As per feucher Attendance Register GGMS, Takôt District Battagram her attendance for the period March 2006 to November 2009 did not
- verify true.

 Mst Zla Gul failed to provide any supporting documents before the committee in favor of duty performed/attendance, charge took over Inter District Transfer Orders, Salary drawn at GGMS Takot District
- The then District Officer Education District Battagram viz Mr. Wasiq said confirmed the signatures on appointment Order as well as entries
- Salary for the period September 2009 to July 2010 (9 months) drawn at Mansahra (F/D) but record /documentation in this regard is not traceable at the Office of DEO (F) Mansehra.
- inter District Transfer order of Mat Zia Gul from District Battagram to District Mansettra is untraceable at the office of DEO(F) Mansenra.
- DEO (F): Mansehra vide her letter (Fiff) (does not confirm performance of duty at: GGMS Mohandel while salary drawn and record in this
- Allied Bank Charsadda, Statement Period 01 January 2014 to 28. September 2017 (F/K) depicts on line transfer salary of Mst Zia Gui. yııı.

Recommendations

- 1- District Education Officer (F) and District Accounts Officer District Mansehra are held responsible for drawl of illegal salary in R/O Zia Gul for the period November 2009 to July 2010.
 - 2- Recovery of salary drawn for the period November 2009 to July 2010 (9 Month) at Manselira be made.
 - (a) As such, the appointment Order as well as Service Book document of Mgt Zio Gullage consucted and hence un considered as fault and yold on

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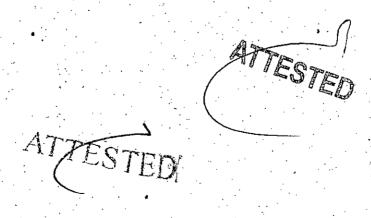
ti Kundi <u>Supreme</u> Court of Pakist<mark>an</mark>

Findings

- i. Appointment order of Mst Zia Gul as DM at GGMS Takot District Battagram is fake and bogus as per record of the office of DEO (F) Battargam.
- ii. As per Teacher Attendance Register GGMS Takot District Battagram her attendance for the period March 2006 to November 2009 did not verify (F/D)
- iii. Mst Zia Gul failed to provide any supporting documents before the committee in faovur of duty performed / attendance, charge took over, inter district transfer orders, salary drawn at GGMS Takot District Battagram etc.
- iv. The then District Officer Education District Battagram viz Mr Wasiq said confirmed the signature on appointment order as well as entries made in Service Book fake and Bogus (F/C)
- v. Salary for the period September 2009 to July 2010 (9 months) drawn at Mansehra (F/D) but record / documentation in this regard is not traceable at the Office of DEO (F) Mansehra.
- vi. Inter District Transfer order fo Mst Zia Gul from District Battagram to District Mansehra is untraceable at the office of DEo (F) Mansehra.
- vii. DEO (F) mansehra vide her letter does not confirm performance of duty at GGMS Mohandri while salary drawn and record in this regard is not traceable.
- viii. Allied Bank Charsadda, Statement period 01 January 2014 to 28 September 2017 (F/K) depict on line transfer salary of Mst Zia Gul.

Recommendations

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



(b) As a 2nd option if the Department deem it appropriate, Mist Zia Gul be reappeared for recruitment, through NTS on the grounds of her reappeared for recruitment, through NTS on the grounds of her deficient gualification, experience/ guty, against which she has received actional gualification, experience/ guty, against which she has received actional gualification, experience guty, against which she has received actional gualification, experience guty, against which she has received a for the period of salary at GoMS Orien Hamsed Main Thungi Charsed a for the period of January 2014 to 28 September 2017. Mėmbe Enquiry Officer Arrested CET TESTOSSTRUES FINE



(b) As a 2nd option if the Department deem it appropriate Mst Zia Gul be reappeared for recruitment through NTS on the grounds of her academic qualification, experience / duty, against which she has received salart at GGMS Dheri Hameed Mian Thungi Charsadda for the period 01 January 2014 to 28 September 2017.

MR. Jehangir Enquiry Officer. Mr. Khizar Hayat Coopted Member



Ine District Education Officer. remale) Charsadda SERVICE VERIFICATION iublect: Reference your letter No.8956 dated 20. 2.2016 on the subject cited above and to state that the official record of this office is completely silent regarding the appointment under reference. Hence they may be considered take and bogus please. The service book in respect Miss. Zia Gul, DM is returned herewith for further r ecossary disposal please. EDUCATION OFFICER (FEMALE) BATTAGRAM illes red



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM

No. 312/F.NO. 8/Vol-I

Dated 18.02.2017

To

The District Education Officer

(Female) Charsadda

Subject: <u>SERVICE VERIFICATION</u>

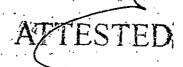
Memo:

Reference your letter NO. 9856 dated 20.12.2016 on the subject cited above and to state that the official record of this office is completely silent regarding the appointment under reference. Hence they may be considered fake and bogus please.

The service book in respect Miss zia Gul, DM is returned herwith for further necessary disposal please.

DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM





<u>ORDER</u> 14.09.2017 Present:- Mr. Mulib Jan Scharzal, Advocate, for the Mr. Rab Nawaz Chan, AAG, for the respondents along with Ms Bushra Beguni, ADEO, DEO(F) Office Charandda. Mst. Zie Gul wife of Hamayoun, the petitioner, allegedly serving as a Drawing Master BPS-15 and presently Posted in Govt Girls Middle School, Dheri Hamid Minn, District Charsedda, is aggrieved from the action of the respondents whereby her monthly salary has been withheld since fenuezy, 2017, without any legal justification. Learned coursed for the petitioner contended that ever fire, or appointment way back in the year 2006 as a Drawing Master at GGMS Thalfot Battagram. the petitioner has been regularly performing her duties and even after her transfer to District Charsadda, she has been regularly attending to her duty and she has been receiving her monthly salary as well, but of a sudden, in pursuance of a leder addressed by DEO (female)

PESHAWAR HIGH COURT, PESHAWAR

FORM "A"

FORM OF ORDER SHEET

Date of Order	Order or other proceedings with the order of Judge		
Order	Writ Petition No. 2028-P/2017		
14.09.2017	With COC No. 477-P/2017		
• • •	Present: Mr Muhib Jan Salarzai, Advocate for the Petitioner		
· · · · · · · · · · · · · · · · · · ·	Mr. Rab Nawaz Khan AAG for the respondents along		
	with MS Bushra Begum, ADEO, DEO (F) office Charsadda.		
	Mst Zia Gul wife of Hamayoun, the petitioner allegedly		
	serving as a Drawing Master BPS-16 an presently posted in Govt		
	Girls Middle School, Dheri Hamid Mian, District Charsadda is		
	aggrieved from the action of the respondents whereby her monthly		
	salary has been withheld since February 2017, without any legal		
	justification.		
	Learned counsel for the petitioner contended that ever		
	petitioner appointment, way back in the year 2006 as a Drawing		
	Master at GGMS Thakot Battagram, the Petitioner has been regularly		
	performing her duties and even after her transfer to District		
	Charsadda, she has been regularly attending to her duty and she has		
	been receiving her monthly salary as well, but all of a sudden in		
	pursuance of a letter addressed by DEO (Female)		
	A CONTRACTOR OF THE PROPERTY O		
	ATTESTED		
	Oxford American Control of the Contr		
•]	ATTESTED		

Baitagram, her safary has been withheld since, January

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

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

TESTED

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

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

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





vere unable to release the salaries of the petitioner. Contronling with the stance of each jother, the parties agreed and requested the Court for sending the matter to And Complien Department for probe and proceedings. Accordingly, the matter is sent to the Director Anti Corniption Khyber Pakhnunkhwa with the direction to probe into the matter within a formight, positively and to submit report to this Court. Office is directed to send copy of writ petition and all documents nnnexed therewith coupled with the continents and

documents brought on regard by the respondents to the Director Audi Corruption Khyber Pakhtunkhwa for doing the needful within a formight and to submit report on or

before the date fixed. Adjourned to 11.16 2017.

JUDGE

ATTESTED

Were unable to release the salaries of the petitioners.

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

JUDGE





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ا الخارج سے معافلار اور مذری وسط برکا باس کا مهر اضال لگا جاسے کا راد دافر تربر کنند وار الله کا دستان الله کا دستان الله کا دستان جارہ کا دستان کا دستان جارہ کا دستان جارہ کا دستان جارہ کا دستان کا دستان جارہ کا دستان کا دستان جارہ کا دستان کار دستان کا دستان کا دستان کا دستان کا دستان کا دستان کا دستان کار دستان کا دستان کا دستان کا دستان کا دستان کا دستان کا دستان کار دستان کا دستان کا دستان کا دستان کا دستان کا دستان کا دستان کار دستان کا دستان کا دستان کا دستان کا دستان کا دستان کا دستان کار دستان کا دستان کا دستان کا دستان کا دستان کا دستان کار دستان کا

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كورنمنت بريس بيناور جاب فيسر 540/19 فارم سنور _ تعداد دو بزار دجشر في موردد 23 مارچ 2006 مريي فور (فارم سنور جابز) منى فارم (پولس)

انسيم جزل بوليس صوبيس حدفارم نبرس

فارم نمبر۲۲_۵(۱)

ابتدائي اطلاعي ربورك

كاؤنثرفا ئئل

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شده زیر دفعہ 154 مجموعه ضابط فوجداری

ضلع: - چارسده

تفانه: ـ AC جارسده

وعه بمندرجه برجعلى اور بوگس بهرتى وٹرانسفرآ رڈ رز وقت نامعلوم	ر:۔2 تاریخ وقت وق	ت نمبر
چاكىدگى پرچە 9/10/17ون ت 15:00 <u>ب</u> ى	تارخُ وقت رپورٹ: -21/9/17 وقت دفتری او قات	1
قاضى أسلم CO دْسْرَكْتْ جِارِسده	نام وسكونت اطلاع د هنده مستنغيث	2
218-409-148-419-420-468-471-	مخفر کیفیت جرم (معد نعه) حال اگر پچھ لیا گیا ہو۔	3
474-477APPC-5(2)-PC Act		
محكمها يجوكيشن حيارسده	جائے وقوعہ فاصلہ تھانہ سے اور سمت: ۔	4
ضياء گل DM وغيره كل 20 نفر ملز مان مندرجه با دُي	نام وسكونت ملزم ،	5
FIR		,
بحواله چھی انگریزی نمبر 3 1 3 5 1 مورخه	كارروائي جوتفتيش كے متعلق كي گئي اگراطلاع درج	6.
9/10/17 مجاريه جناب DAC صاحب خيبر	كرنے ميں توقف موا موتو وجه بيان كرو	
پختو نخی ایشا ور		٠.
سبيل ڈاک بہ بيل ڈاک	تفانه سے روائگی کی تاریخ وقت	7

ابتدائی اطلاع پنچے درج کرو۔

ATTESTED

LEGIBLE COPY

شده میانات موصول شده ویریشیکهن ربورث مائے کی تی اکوائری سے تمام مزمان ا نے ای اکس میچر DM کرید GGMS9 حمد میان و غیری جارمده _2_ كلبت سيما في ميل ميچر AT محريد GGHSIS دادو كله _ 3_ صرت في ميل ميچر PET محريد GGMS9 ترلاندي _ 4_ ثانيه ولي في ميل ميچر SST مريد GGHS،16 دولت يوره - 5 مريع بيم في ميل PST الريد GGPS،7 بينام كورونه بيارسده - 6 مونيه DEO في ميل كريد 18 مثلع عارسده -7-الفت بيم مابقه DEO في ميل محرية 18 ضلع جارسده -8-عمر اياز DAO محرية 18 ضلع بكرام حال وس -9-حامد يونس سب ا كا وَ يُصِف مُريدُ 15 صَلِح بِكُرام حال ومس - 10 _محمد رياض بينم آيا بيرًاريدُ 16 صَلِح بِكُرام حال ونتر DAO صَلِح ماشهم ه - 11 _عمران الله KPO مُريدُ 14 صلع مات موه وفتر DAO_12_طارق محود ATO كريد 16 صلى بلكرام _13_اور كازيب سينتر آؤيير كريد 15 وفتر DAO بظرام حال وسم -14- محداثان سينتركلرك كريد 14 فا تا بجويش ميكفريك -15 - مشاق احرسابقد برنشلان كريد 17 دفتر DEO في ميل جارسده -16 على رحن سابقه سير علر شن وفتر DEO في ميل ضلع بلكرام كريد 17-17- مظهر حسين جونيرَ كلرك أريدُ وفتر ذي اي او في ميل جارسده -18-محمد اسحاق سينتر كلرك كريد 11 وفتر SDEO في ميل -19 سيل PST كريد GPS، 12 يثاور فورث - 20 سرتاج وينر ككركيد 11 وفتر SDEO في ميل جارسده حال GHS نمبر 1 چارسده وقا فو قال آپس میں ملی بھکت کر کے فراڈ دھوکہ دین دی سے اپنے اختیارات کے غلط و نا جائز استعال کر کے ضلع چارسدہ میں سرکاری خزانه كوتخواه في مدين كل بين 5766918 روي نقصان يونيا ي جبكه بيانات قلمبند شده زير وفعه CrPC164 سے پايا كيا كه مزمان سيريل نمبر 6 تا 20 ایک مظم کروپ یا گینگ کی شکل میں ای طرح کارروائی کر کے لوگول کوٹوکری جھانسدد میکران سے لاکھوں روپے بور لتے ہیں لہذاتمام ملزمان 1 200 آئیں میں لی جمکت فراڈ دھوکہ دی اختیارات کا غلط اور ناجا تر استعال اور رشوت دینے اور لینے کے مرتکب پایکرجن کے خلاف بحوالہ چھی انگریزی نمبرى15313 مورخه 9/10/017 مجاريه از جناب DAC حب نيبر پختونخو ايثا ورمقد مددرج رجيز كياجا تا يه بمّام الكوائري كارروا في خمني كا حسرتصور ہوا اگر دوران تغیش دیکرکوئی مخص یا اشخاص یا دیگر سرکاری طاز من ملوث یائے گئے تو ان کے خلاف بھی حسب ضابطہ قانونی کارروائی عمل میں لائی جائیگی پر چہ ا گزارش ہوں۔

ستخطأ لگریزی.....

9-10-017

الجلاع کے بیچاطلاع دہندہ کا دستینا ہوگا یا اس کی مہریا نشان لگایا جائے گا۔ مرافسر تجریر کنندہ ابتدائی اطلاع کا دستینا بطورتصدیق ہوگا حرف الف یاب سرخ روشائی ہے۔ بالقابل نام ایک ملزم پامشتہ علی اکتر تبیب واسطے باشندگان علاقہ غیریا وسط ایشیا ، یا فغانستان جہاں موز دیں ہوں ملکھنا جا ہیے۔



Office of the District Education Officer Female

District Charsadda

	fil.A
0919220086 e	mischarsadda.deof@yahoo.com : 140
No.	/ Dated 16 1 06 2022
· ·	
OFFICE ORDER	At albora (3) clith cases
In Compliance of the Judgment dated	11-11-2021 titled Nazma Ali others (3) club cases with the consultation and recommendation of the
passed by the Hon,ble Service tribunal	with the consultation and recommendation of the
Enquiry committee discussed nerein	Was reading opinion that the following
competent authority and the instant co	ases of the section Moreover notification
appellants are not entitled to reinstate	against the pools 10644-46 dated 22-11-2017 of the Ex-
been Endst Nos 1508-15 dated 19-07-2015	ed in the interest of public service please.
DEO (F) Charsadda are nereby mannam	
S.No.: Name of teachers	School names
1 Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
	GGPS pigham Charsadda
2 Mst shama begum Ex-F51	
3 Nighat seema Ex AT	GGHS Dadu killi Charsadda
4 Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda
TVIST ZAR CAR	
	11/1
	0/ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
	DISTRICT EDUCATION OFFICER
	(FEMALE) CHARSADDA
17.20	16 06 2022
Endst NO-/2025-30 dated-	and the same of th
Copy for information	
(1) PA to director E&SE khber pukhtoon	a khwa
(2) Mst Nazma Ali Ex-CT GGMSRajjar (3) Mst Shama begum EX-PST GGPS Pig	gham killi Charsadda.
(3) Mst Shama begum EX-PST GGHS Da (4) Mst Nighat seema EX-AT GGHS Da	du killi Charsadda.
(4) Mst Nighat seema EX-AT GGHS Da (5) Mst Zia Gul EX- DM- GGMS dheri I	lameed Mian Charsuda.
(6) office file.	
	$1 \sim \infty$
	5/VVI
	DETRICT EDUCATION OFFICER

(141)

K hattak

17th Oct., 2022

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

SCARINED SCAPST Postawar

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

(Kalim Arshad Khan) Chairman

4th Nov. 2022

- None for the petitioner present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.
- On 02.09.2022 implementation report was filed by the DEO (F) Charsadda according to which, in compliance with the judgment of the Tribunal, the petitioner, alongwith three others, were initially reinstated in service vide order dated 20.01.2022 but on the directions of the Tribunal a de-novo enquiry was conducted where-after the petitioner and the three others were found not entitled to be reinstated vide office order Endst No. 12025-30 dated 16.06.2022. The order dated 16.06.2022 has created a new cause of action in favor of the petitioner and he may recourse to other legal proceedings available to him under the law. As regards this petition, the compliance of the judgment has been made, therefore it is filed. Consign.
- 3. Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal on this 4th day of

November, 2022.

Filled to be ture com

ber Pakhtunkhwa Tribunal (Kalim Arshad Khan) Chairman Amen or On

(142)

BEFORE THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED
OFFICE ORDER NO 12025-30 DATED 16-06-2022
WHEREBY THE INITIAL IMPUGNED OFFICE ORDER
NO.10643 DATED 22/11/2017 PASSED BY THE DEO
(FEMALE) CHARSADDA HAS BEEN KEPT MAINTAINED,
AND THE SERVICE OF THE APPELLANT HAS BEEN
DISPENSED BEING NO MORE REMAINED TEACHER.

Prayer:

On acceptance of this departmental appeal, both the impugned Office Order No 12025-30 dated 16-06-2022 & initial impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda may kindly be set aside and the appellant be re-instated to her service with all back benefits.

Respectfully Sheweth:

1. That the Appellant was initially appointed as PTC-trained in B.P.S 07 vide appointment order dated 07/05/2003 by the competent authority after adopting all the codal & legal formalities, which was later on upgraded to B.P.S-12 and after proper verification was posted in GGPS Pegham Korono Charsadda as PST and thereafter without any legal & lawful reason vide office order No 10643 dated 22/11/2017 passed by the DEO (Female) Charsadda, the service of appellant was dispensed, thereafter the appellant filed Service appeal No 1390 / 2018 which was allowed vide order dated 11-11-2021 by setting aside the impugned order and the case was referred for regular and detail inquiry but now again without conducting any detailinquiry as order by the Honorable Tribunal, the DEO (Female) Charsadda passed the impugned Officer Order No 12025-30 dated 16-06-2022 whereby the initial order has been kept maintained by dispensing the service of appellant.

- 2. That both the impugned office order No 12025-30 dated 16-06-2022 & initial impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda are totally illegal, against E&D Rules 2011, justice and facts of the case therefore not tenable.
- 3. That according to the Direction of Honorable Service Tribunal no inquiry has been conducted, nor any no show cause notice an statement of allegation has been issued to the Appellant, neithe the Appellant was informed or associated in the alleged inquiry and no opportunity of hearing has been provided to the Appellant, therefore the impugned order has been passed on the back of the appellant meaning thereby, that the initial order of DEO (Female) Charsadda has been endorsed without complying the direction of the Honorable Service Tribunal KPK Peshawar.
- 4. That the alleged inquiry officer has not called the appellant for inquiry proceeding and the alleged inquiry report was prepared just to absolved himself by the DEO (Female) Charsadda from the direction of Honorable Service Tribunal KPK Peshawar, therefore the impugned order is illegal and not according to law nor inconsonance with the fact of the case rather the same has been passed to show that the inquiry proceeding has been conducted in the light of the order of Honorable Service Tribunal KPK Peshawar.
- 5. That the appellant has been appointed in the year 2003 and the DEO (Female) Charsadda has been awakened from deep slumber in the year 2014 by declaring the appointment order of the appellant to be fake, despite the fact that every year in the service book of the appellant, the service of the appellant has been verified by the competent authority, and the services of appellant is also mature for pension, therefore the allegation of fake appointment of the appellant is baseless and based on mala fide.



- 6. That in the alleged inquiry, there is no assertion of the officer / competent authority of the relevant time who has denied the appointment order of the appellant nor the statement has been recorded of the officer, who had appointed the appellant by the inquiry officer to determine the genuineness & fakeness of the appointment order of the appellant.
 - 7 That the appellant has more than 10 year service on her credit and at this belated stage, it does not appeal to the prudent mind that the appointment order of the appellant is false or fraudulent and fake.
 - 8. That the alleged inquiry officer has not followed the E & D Rule 2011 in letter & spirit rather the same has been violated by submitting a frivolous inquiry report for dispensing the service of the appellant.
 - 9. That the word dispensing is no where mentioned in the service law or E & D Rule 2011, therefore the impugned dispensing order as well as the alleged inquiry conducted by the so called inquiry officer are not true & correct in the light of the judgment & direction of the Honorable Service Tribunal KPK Peshawar.
 - 10. That while dispensing the service of the appellant, no final show cause notice was issued to the appellant and the appellant has been kept un informed from the alleged inquiry and the alleged inquiry was filed in the execution proceeding before the Honorable Service Tribunal KPK Peshawar, wherefrom the appellant has got the knowledge of the alleged inquiry & impugned order, and the execution petition was disposed off on 17-10-2022.
 - 11. That the appellant also request for personal hearing at the time of hearing / disposal of instant appeal.



Prayer:-

It is therefore requested that on acceptance of this departmental appeal on behalf of appellant, the impugned service dispensing Order No 12025-30 dated 16-06-2022 & impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda may graciously be set aside and the appellant be re-instated to her service with all back benefits.

Appellant

Mst Shama Begum

(Ex-PST GGPS Pegham Korona Charsadda

