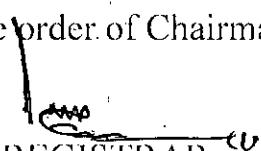


FORM OF ORDER SHEET

Court of _____

Case No. - 567/2023

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/03/2023	<p>The appeal of Mr. Sar Taj resubmitted today by Mr. Yasir Saleem Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. SB7/2023

Sar Taj, Ex-Senior Clerk Appellant

VERSUS

Government of Khyber Pakhtunkhwa and others

..... Respondents

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Grounds of Service Appeal		1 - 6
2.	Affidavit		7
3.	Copies of Charge Sheet and Reply	A & B	8 - 11
4.	Copy of the Inquiry Committee	C	12 - 38
5.	Copies of Show Cause Notice dated 26.04.2022 and Reply dated 17.05.2022	D & E	39 - 42
6.	Copy of Penalty Order dated 24.11.2022	F	43
7.	Copy of the Departmental Appeal dated 30.11.2022 communicated to the Department vide diary No. 2680 dated 02.12.2022 & Notification dttd 17/12/18	G H	44 - 46
8.	Wakalat Nama		47

Appellant

Through

Yasir Saleem
Advocate

Dated: 09.03.2023

High Court, Peshawar

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. SB7/2023

Sar Taj, Ex-Senior Clerk in the office of the District
Education Officer (F), Mardan

..... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief
Secretary, Civil Secretariat, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa,
Elementary and Secondary Education Department,
Peshawar
3. Director, Elementary and Secondary Education,
Khyber Pakhtunkhwa, Peshawar
4. District Education Officer (F), Mardan

..... Respondents

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED OFFICE ORDER DATED
24.11.2022, WHEREBY MAJOR
PENALTY OF COMPULSORY
RETIREMENT FROM SERVICE HAS**

(4)

of the Departmental Appeal dated 30.11.2022 communicated to the Department vide diary No. 2680 dated 02.12.2022 is attached as Annexure G).

9. That now the appellant approaches this Hon'ble Tribunal by filing of instant appeal inter-alia on the following ground:

GROUND:

- A. That the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the Constitution are badly violated.
- B. That no proper proceedings were conducted prior to the imposition of major penalty of compulsory retirement from service.
- C. That it is pertinent to mention here that the inquiry report has never been communicated to the appellant.
- D. That the appellant was never associated properly with inquiry proceedings. Furthermore, there was not a single evidence against the appellant which could minutely associated him with the allegations contained in the charge sheet.

5

- E. That not the single witness appeared before the Inquiry Committee to record his statement against the appellant or if any, the appellant was never provide opportunity those who may have deposed against him.
- F. That even otherwise, out of four charges only one charge was held to be proved against the appellant that the inquiry Committee has badly ignored the fact and notification dated 17.12.2019 vide which different duties were assigned to different officials. It is pertinent to mention here that the appellant was assigned the affairs relating to "AT, TT, DM, PET, Qaria". Furthermore, it was also proved during inquiry that the appellant was never involved in the process of recruitment in any of the CT, Junior Clerk and Lab Assistants. (Copy of Notification dt. 17/12/2019 is attached as Annexure H)
- G. That it was also proved during the inquiry proceedings that actually Mr. Israr (Junior Clerk) was involved in the matter but even then the appellant was held guilty which is not sustainable under the eyes of Law.
- H. That the impugned order has not only stigmatized his spotless service carrier but also has badly effected the financial position of the appellant as his only earning hand of his family.
- I. That the appellant is jobless since the illegal penalty imposed upon him.

6

J. That any other ground would be raised with the permission of this Hon'ble Tribunal during the course of hearing of appeal.

It is, therefore, humbly prayed that the instant Appeal may kindly be accepted as prayed for.



Appellant

Through


Yasir Saleem

Advocate

High Court, Peshawar

Dated: 09.03.2023

CERTIFICATE

Certified that as per instructions of my client, that this is the first Service Appeal on the subject before this Honourable Tribunal.


ADVOCATE

7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2022

Sar Taj, Ex-Senior Clerk Appellant

VERSUS

Government of Khyber Pakhtunkhwa and others
..... Respondents

AFFIDAVIT

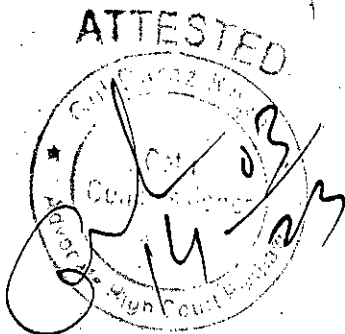
I, **Sar Taj**, Ex-Senior Clerk in the office of the District Education Officer (F), Mardan, do hereby solemnly affirm and declare on oath that the contents of accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Identified by:

[Signature]
DEPONENT

CNIC# 17102-6970413-7
Cell # 0314-9486028

[Signature]
Yasir Saleem
Advocate,
High Court, Peshawar



8

Annex "A"

CHARGE SHEET

I, Dr. Kazim Niaz, Chief Secretary, Khyber Pakhtunkhwa as the Competent Authority, hereby charge you, Mr. Sarraj Senior clerk DEO(F) office, Mardan as follows: -

That you while posted as S/C at DEO (F) office Mardan committed the following irregularities.

- i. You did not verify service documents of under transfer employees before activating their salaries.
- ii. You are responsible for fake appointment of Mst. Asma C.T.
- iii. You are responsible for induction of fake employee Mst. Sacwat Lab Assistant.
- iv. You are responsible for induction of fake employee Mr. Imad Khan Junior Clerk DEO(F) office Mardan.

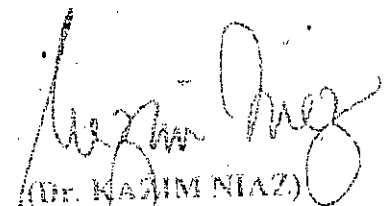
By reasons of the above, you appear to be guilty of inefficiency and misconduct under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the rules ibid.

You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the enquiry officer/enquiry committee, as the case may be.

Your written defence, if any, should reach the enquiry officer/ enquiry committee within specified period of time, failing which it shall be presumed that you have no defence to put in and, in that case, ex-parte action shall be taken against you.

Initials whether you desired to be heard in person.

A statement of allegations is enclosed.


(Dr. KAZIM NIAZ)
CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Mr. Sarraj
Senior Clerk DEO(F) Office Mardan


ATTESTED

DISCIPLINARY ACTION

9

1. Dr. Azizur Niaz, Chief Secretary, Khyber Pakhtunkhwa as the Competent Authority, in the opinion of the opinion that Mr. Sartaj Senior Clerk DEO (F) Mardan, has rendered himself liable to be proceeded against, as he committed the following acts/omissions within the meaning of Rules-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 1974.

STATEMENT OF ALLEGATIONS

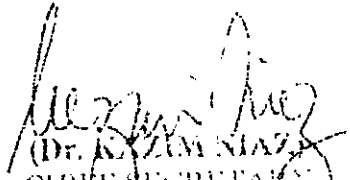
- i. He did not verify service documents of under transfer employees before activating their salaries.
- ii. He is responsible for fake appointment of Mst. Asma C.T.
- iii. He is responsible of induction of fake employee of Mst. Maryam Khan.
- iv. He is responsible of induction of fake employee Mr. Inad Khan Junior Clerk DEO(F) office Mardan.

For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer/inquiry committee consisting of the following, is constituted under Rule 10(1)(a) of the Rules ibid.

- i. Muhammad Ramzan M.D.
- ii. M.A. Edris Foundation
- iii. Ms. Tasleem Begum Principal B.S. 20

The inquiry officer/inquiry committee shall, in accordance with the provisions of the Rules ibid, provide reasonable opportunity of hearing to the accused, record its findings and report within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer/inquiry committee.


(DR. AZIZUR NIAZ)
CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Mr. Sartaj
Senior Clerk DEO (F) office Mardan


ATTESTED

The Dr. Kazim Niaz
Chief Secretary KPK.

Subject: REPLY TO CHARGE SHEET ISSUED 19-JULY-2021
RECEIVED ON 06-AUGUST-2021

Respected Sir,

With utmost respect I humbly submit the words in my defense in detail as under.

1. That I have served in Elementary & Secondary Education Department on various posts since 23-02-1993 initially as Junior Clerk.
2. That presently I am serving as Senior Clerk at the office of GHS Katlang.
3. That I have served to the best of my ability, dedication, devotion and honesty.
4. That I have served to the entire satisfaction of my superiors and there is no complaint against me till date.
5. That there is no penalty & warning against me in my entire service till date.
6. That the allegation leveled against me is baseless against the fact. That the DEO (F) Office have verified each and every transfer order of other district made through proper channel from the Directorate of Elementary & Secondary Education Peshawar and from the concerned District from where the teacher have been transferred before the issuance of the pay release of the concerned teachers accordingly as per rules. (Copies of all the verification are attached as Annex "A" to "D) A-N
7. That it is also important to mention here in my defense, that I was not involved in the induction of Junior Clerk & Lab Assistants at any stage during my posting as Senior Clerk at the office of DEO (F) Mardan as I was Dealing Assistant only to the post AT, TT, DM, PET & Qaria at the office DEO (F) Mardan.
8. That the signature of the then District Education Officer (Female) Mardan on the Appointment order of Mst; Asma CT BPS-15 is scanned one and different. the same can be checked/compared with the original signature. The said order does not bear my initial also.
9. That the appointment order is fake & factitious and is not issued from the office of District Education Officer (Female) Mardan. As the office was totally unaware of the said appointment order.
10. That the pay release order is also fake and factitious as evident from the endorsement no of the pay release order as the same has file name

ATTESTED

SS/SST/2019-20. While, in case of CT BPS-15 the file name in the Endst No must be CT/2020-21 accordingly. This shows the bogusity in all respect.

11. That it came in to the knowledge of the DEO (F) Mardan by District Account Officer Mardan vide letter No. DCA/MRD/ADM/N/2020-21/2018 dated 11-11-2020 regarding the status of the Appointment order of Mst; Asma CT, BPS-15.

12. That after checking the entire record it was conveyed to the DAO Mardan vide Letter No 4970 dated 14-11-2020 by the DEO (Female), that the appointment order of the Mst; Asma CT, BPS-15 totally fake & bogus and is not traceable in the record of this office nor any pay release order has been issued from this office. (Copy of letter 4970 is attached as Annex-1)

13. That it is also worth mentioning here that the pay is also not released to the Mst; Asma CT being bogus appointment.

14. That I also assure in all respect on oath that neither I nor any one of the office of DEO (F) Mardan is involved in this fake & factitious order and it is clearly evident that the entire bogusity is done outside the office to defame the entire office.

15. That I am ready to appear in person to your good office as when and where directed to explain my position in all respect.

It is therefore requested that the allegation leveled against me may please be turn down as I am innocent in this regard and I may please be exonerated from the charges leveled against me. I will be very thankful for your this kindness.

Yours Obediently
Sartaj
Senior Clerk
GHS Kallang

Dated: 09-08-2021

ATTESTED

(F2)

Annex "C"

INQUIRY REPORT IN RESPECT OF DEO(F) MARDAN AND OTHERS.

1) AUTHORITY:-Notification # SO(S/F)E&SED/4-17/2021/INQUIRY AGAINST DEO (F)MARDAN Dated 25-10-2021.(Annexure 1)

2) ACCUSED:-

1. Mst Farzana Sardar Ex-DEO (F) Mardan.
2. Mst Rukhsana Raheem Ex-DDEO (F) Mardan.
3. Mst Lubna Tauheed ExPrincipal GGHSS Koper Mardan
4. Mst Naheed Ex- incharge GGHS Shamoza Mardan.
5. Mst Yasmeen SST (G)Ex-incharge GGHSS Koper Mardan.
6. Mr Sartaj S/C o/o DEO (F) Mardan.
7. Mr Nisar S/C GGHSS Koper Mardan.
8. Mr Israr S/C GGHSS Koper Mardan.
9. Mr Murad S/C o/o DEO (F) Mardan.

3) CHARGES:-

1. Irregular and illegal transfers of various category of district cadre employees.
 2. Irregular, illegal Direct induction of various category employees in the system
- 4) VENUE: 1. Various female schools of Mardan specially GGHSS Koper Mardan. 2. Office of DEO(F) Mardan. 3. Office of Managing Director merged area education foundation.

5) TOOLS OF THE ENQUIRY

All tools including questionnaires, interview/ personal hearing were utilized to:-

1. Find out IRREGULAR AND ILLEGAL TRANSFERS of various categories of district cadre employees.
 2. IRREGULAR, ILLEGAL DIRECT INDUCTION of various category employees made in the system by "Eminence Grice", as mentioned in the preliminary enquiry report (Annexure 1-42) at page 16.
- WHAT DID THE ENQUIRY COMMITTEE OBSERVE.

In order to find out IRREGULAR AND ILLEGAL TRANSFERS of various categories of district cadre employees. The preliminary enquiry report has:-

- 1) Identified 19 employees (Annexure 2-3) in utter violation of transfer policy and even in ban period(16.09.2019) (Annexure D30)
- 2) Certain employees transfer was found on record , the preliminary enquiry speaks of 10 but they are 04 in number(Annexure 20).
- 3) 25 NTS teachers had been transferred by Mst Farzana Sardar in total violation of NTS Policy of the government.(Annexure 22-23).
- 4) Suspected/bogus employees shown in the charge sheets (Annexure 24)
- 5) The list of 127 (Annexure 25-32)Individual orders of 127 teacher whose record was not available in the office but transferred (33-126).
- 6) Individual orders of 25 NTS teachers listed (Annexure 22-23) had been issued by Mst Farzana Sardar in total violation of NTS Policy of the government, individual orders (Annexure 127-143).

WHAT DID THE ENQUIRY COMMITTEE DO.

QUESTIONNAIRES were served upon all the accused.

1. Mst Farzana Sardar Ex-DEO (F) Mardan(Annexure A1,A2)
1. Mst Rukhsana Raheem Ex-DDEO (F) Mardan.(Annexure A3)
2. Mst Lubna Tauheed ExPrincipal GGHSS Koper Mardan.(Annexure A4)

1

ATTESTED

3. Mst Naheed Ex- incharge GGHS Shamoza Mardan.(Annexure A5)
4. Mst Yasmeen SST (G)Ex-incharge GGHS Koper Mardan.(Annexure A6)
5. Mr Niqab Assistant o/o DEO female Mardan.(Annexure A7)
6. Mr Sartaj S/C o/o DEO (F) Mardan.(Annexure A8)
7. Mr Nisar S/C GGHS Koper Mardan.(Annexure A9)
8. Mr Israr S/C GGHS Koper Mardan.(Annexure A10,A11)
9. Mr Murad S/C o/o DEO (F) Mardan.(Annexure A12) Including,

10. the siting DEO (F) Mardan.(Annexure A13,A14)
 The lists(Annexed A15,A43) of the employees that were revealed to have come through transfer to Mardan district, either from other districts/agencies or from other cost centre in the same district of Mardan, (OR they have Re-interned into the system, upgraded or are leaving) were provided to the respective DDOs

- i. Mst Hasrat Zuhra DEO (F) Mardan, under her DDO Ship function schools with cost centre MR6046 wherein 171 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A15 toA20), whereas 04 employees in office MR6391 (Annexure A21) and respective SDEOs:-
 - ii. Mst Seema Saleem, SDEO (F) Mardan khas under her DDO Ship function schools with cost centre MR6158 wherein 272 employees had been/are being paid wef 2018-2021 (Annexure A22-A30).
 - iii. Mst Waheeda Naz, SDEO(F) Takht Bhais under her DDO Ship function schools with cost centre MR6159 wherein 196 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A31-A38), office MR6029 (Annexure F7-F15)
 - iv. Principal GGHS Koper Mardan under her DDO Ship function her with cost centre MR6254 wherein 10 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 MR 6254 (Annexure A38),
 - v. Mst Shehnaz Ihsan, SDEO (F) Rustam under her DDO Ship function schools with cost centre MR6499 wherein 54 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A39 toA40) and office MR6496 wherein 2 employees had been inducted in the system.(Annexure A41).
 - vi. Mst Shehla, SDEO (F) Kallang under her DDO Ship function schools with cost centre MR6439 wherein 23 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A42) MR6412 wherein 01employee had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A43).
2. Each one of the above 5 officers were given 20 certificates(Annexure A44 toA47) four each for owning disowning the employees of their respective two cost centers, the list of which had been sent to them.
 3. One of the list of cost centers had been provided by the office of DEO (F) Mardan (Annexure A48-A52).
 4. A letter had been sent to DEO(F) Mohmand(Annexure A53) along with a list of (08) employees (Annexure A54) who had been on the pay role of DEO Mohmand and are now on the pay role of DEO(F) Mardan and asked DEO (F) Mohmand to convey the mode of their recruitment in Mohmand and mode of transfer to Mardan and also the mode of promotion of Mst Shaheen Aslam CT/SST.Mst Riaz Begum DEO(F) Mohmand disowned Mst Shaheen Aslam CT stating that she has no record in Mohmand district and submitted report on whatsapp (Annexure D19). The committee went to Mohmand asking DEO(F) to verify Mst Shaheen Aslam CT/SST record from accounts office Mohmand as the whatsapped letter had no sign. Mst Riaz Begum owned remaining Seven Employees(Annexure D20), and owned Mst Saheen Aslam CT(Annexure E5) admitting that Mst Shaheen

ATTESTED

(14)

Aslam CT had been working in Mohmand wef 01.11.2004 to 31.12.2012 under P#110439. further verification needs to be made as to the facts about Mst Shaheen Aslam CT are correct or otherwise.

5. Each high and higher secondary school in Mardan was asked through the DEO.(F) Mardan to submit a certificate in respect of the employees the list of 139 employees that have come to the system the list (Annexure A55--A59) of which was shared with the respective Principal Head Mistresses through the sitting DEO.(F) Mst Hasrat Zahra, to own or disown so as to know as to how much other employees have been inducted by Mr Israr JC who is already in Mardan jail.
6. Certain letters were issued to the others reported in the preliminary enquiry and public as involved in the above sated charges viz a viz :-
 - a) Mr Imran JC the then dealing clerk (Annexurre E10) of non teaching staff.
 - b) Mr Immad JC GGHS Moti Banda Mardan (Annexurre E11) for clarification of fake appointment of Asma CT, Maryam SST and Azra CT.
 - c) Mr Roohullah B&A officer & Mr Fawad KPO (Annexurre E12) for fake appointment of Naeema Shaheen and her sisiter & Mst Salma Shaheen.
 - d) Mr Liaqat legal Advisor for office of DEO(F) Mardan (Annexurre E13) for tampering in court judgement issued in favour of sacked employee, making the bogus appointment of Mst Sajida PST and Mst Sameena PST possible.
 - e) All bogus employees (Annexurre E14) to appear before the enquiry committee with the justification of their appointment with a copy to deputy commissioner mardan for ensuring their presence in the venue, date and time mentioned in the letter (Annexurre E14).
 - f) DEO(F) Mardan had also informed them all through the letters (Annexurre E16-E19).
 - g) Mr Roohullah B&AO has submitted his statement requesting for exoneration with out informing the committee of the actual position. (Annexurre E20).
 - h) Mr Mohammad Imran Ex-JC has submitted his statement. (Annexurre E21).
 - i) Mr Fawad KPO has submitted his statement. (Annexurre E22).

WHAT DID THE ENQUIRY COMMITTEE SEE REGARDING CHARGES.

Mst Farzana Sardar replied (Annexure A60-A63) to the questionnaire already served upon Mst Farzana Sardar, DEO(F) Mardan now DEO(F) DIK comprising of 29 questions including those 13 questions reflected in the charge sheet replied (Annexure 168-171) by her as follow.

Charge1	You have transferred 19 PST, SPST & PSHT(F) in utter violation of the transfer policy.
Reply	That I have served to the best of my ability, dedication, devotion and honesty.
Conclusion	She has transferred 19 (Annexure 1-10) PST, SPST & PSHT(F) in utter violation of the transfer policy Notified on 11.09.2019 vide SO(SM)S&SED/7-1/2019 posting/ transfer/ policy of TC. The same is also available on net. Charge proved.
Charge2	You have transferred 10, CT, DM, & TT during BAN period, against the policy.
Reply	That I have served to the entire satisfaction of my superiors till date.
Conclusion	She has transferred (04) CT, DM, & TT (Annexure 11-13). Charge Partially Proved.

ATTESTED

Charge 3	You hav transferred 127 PSTs,/SPSTs illegally and irregularly, whose record is not available.
Reply	In reply to Para/Charge.2 that no transfer had been made in the ban period(16.09.2019) (Annexure D30) during my tenure at district Mardan.
Conclus ion	She has made transfers as many as 127 (Annexure 14-141). <u>Charge Partially Proved</u>
Charge4	You have transferred 26PSTs,TTS,AT,&CTI who were employed school based and wer non-transferrable.
Reply	In reply to Para/Charge 3 no such transfer in a bulk have been made which have no record.
Conclus ion	She has transferred (25) PSTs,TTS,AT,&CT of NTS (Annexure 142-165) <u>Charge Proved.</u>

Charge 5	You did not take action in time thus facilitated fake induction.
Reply	Ordered an enquiry and forwarded a request for FIR to the DPO however I was transferred from Mardan that is why I was unable to proceed against the others, if I was involved at any stage I would not have made any action which clearly show my innocence in this regard
	Yes she had done all this as is evident from (Annexure A67) . <u>Charge Not Proved</u>
Charge 6	You did not take any action against Mr Israr & Mr Imad fake employees, although you knew the fact.
Reply	That the appointment of Mst Karishma Shah lab assistant is also fake and factitious appointment have my fake /scanned sign. As the fake dispatch #5690/G having date 26.10.2020 on the appointment order this is bogus and has no record in the office register. This is also evident from the office register that the dispatch number is in continuation was 4623/G on 22-October-2020 while in start of November 2020 4902/G. that is why the salary of Mst Karishma was not drawn being the fake order copy attached as annexure "G"
Conclus ion	Mr Israr JC in himself is a MAFIA having ties with other connected offices but solid proof to that effect were not available so the <u>Charge Not Proved.</u>
Charge 7	You altough knew of fake employees, yet, signed their appointment orders.
Reply	That after checking the entire record it was conveyed to the DAO Mardan vide letter #4970 dt 14.11.2020 by the DEO (F) that the appointment order of Mst Asma CT.B-15 is totally fake and bogus and is not trace able in the record of the office. Nor any pay release order has been issued by the office. The pay is not release to Mst Asma CT being bogus appointment. (Copy attached as annexure L)
Conclus ion	Three appointment orders have been issued in respect of 1 st Mst Asma CT has been shown as transferred from GGHS Khnori Malakand vide Endstt # 31430-35 dt 14.09.2020.(Annexure B2) 2ndly Mst Asma CT has also been shown as appointed through NTS by Scoring 127.42 Endstt # 1704/G.(Annexure B2a) thirdly Mst Asma CT has also been shown as appointed through NTS by Scoring 127.42 Endstt # 1706/G dt11.05.2020. (Annexure B2b)Mst Asma possesses three order one her transfer and two her appointment orders. Had the DEO involoved triple orders would have

ATTESTED

	not issued so the <u>Charge Proved</u>
Charge 8	Mst Sumbal D/O Rehmat khan was inducted as Lab Asstt on fake appointment order while you were DEO(F) Mardan.

Reply
 That the appointment order of Mst Sumbal D/O Rahmat Khan is issued before my arrival as DEO(F) Mardan. As I took charge in March 2020, as the same does not bear my signature. The said order was issued on 06.01.2020; however, the sign of the then DEO (F) also seems to be the fake/scanned affixed over it along with the bogus dispatch No. Which has no record in the office register. That I also assure in all respect on oath that neither I nor any one of the office of DEO(F) Mardan is involved in this fake and factitious orders and it is clearly evident that the entire bogosity is done outside the office to defame the entire office.

Conclusion
 As a matter of facts firstly Mst Sumbal has also been appointed as Laboratory Assistant against deceased son quota vide Endstt #92/G dt 06.10.2020 (Annexure B6) whereas none of her parents is government employee. Nor any one among her parents died during service. The father of Mst Sumbal is Mason. And her mother is house wife secondly the same Mst Sumbal has also again been appointed as subject specialist in Pakistan studies B-17 in GGHS Koper Mardan (Annexure B7)

Had the then DEO (F) Mst Farzana involved this duplication would have not happened one hand and Sumbal was appointed in School by Mr Israr JC so Charge Not Proved.

Charge 9	You although knew, signed fake appointment order blindly as you confessed by you.
----------	---

Reply
 That I have not made any statement and confession at any state that I have blindly signed any order. Nor I have been heard by any one as per the law according.

Conclusion
Charge Not Proved.

Charge 10	You, being Ex-DEO(F) Mardan are directly responsible for abetment and negligence in the case of fake appointment.
-----------	---

Reply
 That I am not responsible for any kind of abetment and negligence at any stage. As I have thoroughly explained above I took firm action against the one Mst Sarwar Lab Asstt till my presence at that station, ordered an enquiry and forwarded a request for FIR to the DPO. However I was transferred from Mardan that is why I was unable to proceed against the others. If I was involved at any stage I would have not made any actions which clearly show my innocence in this regard.

Conclusion
 Yes she had done all this as is evident from (Annexure A67) Mst Farzana Sardar Ex DEO lodged FIR and wrote to DPO and also ordered inquiry so Charge Not Proved.

Charge 11	You being Ex-DEO (F) are responsible for fake appointment of Mst Karishma Shah Lab Asstt.
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Reply
 That the appointment of Mst Karishma Shah Lab Asstt is fake and factitious appointment having many fake/scanned sign. As the fake dispatch No.5690/G having


ATTESTED

date as 26.10.2020. On the appointment order. This is bogus and has no record in the officer register. This is also evident from the office register that the disptch No. In continuation was 4623/G, on 22nd october 2020 while in the start of nover 2020 4902/G that is why the salary of Mst karishma was not drawn being the fake order.

Conclusion
All the attempts of MAFIA failed with the induction of Mst Sarwat Laboratory assistant. Earlier 7 employees had been successfully inducted in the system viz a viz 1. Mr Israr JC in GGHS Koper Mardan with P#926918 (2) Mst Sumbal LabAsstt in GGHS Koper with P# 932174 (3) (4) Mst Sumbal Subject Specialist in GGHS Koper with P#954100 (5) Mst Azra CT GGHS in Shamozaai with P#952810 (6) Mst Asma CT in GGHS Kotki with P#952808(7) Mst Maryam SST GGCMHSS in Katlang with P#932315 but MAFIA badly failed in activating the salaries of (1)Mr Imad JC in GGHS Moti Banda. (2) Mst Resham in GGHS Katti Garhi (3) Mst Karishma Lab Asstt and (4) Mst Sarwat lab asst in GGHS Koper. **Charge Not Proved.**

Charge 12 You are responsible for fake appoinemt of Mst Asma CT.
Reply That after checking the entire record it was conveyed to the DAO Mardan vide letter #4970 dt 14.11.2020 by DEO(F) , tha'the appointment order of Mst Asma CT, BPS-15 is totally fake and bogus and is not traceable in the record of the office nor any pay relaease order has been issued from the office. The pay is not released to Mst Asma CT being bgus appointment.

Conclus ion Mst Asma CT salaries had been issued under P#952808 but the activation of salries in respect of (1)Mr Imad JC in GGHS Moti Banda. (2) Mst Resham in GGHS Katti Garhi (3) Mst Karishma Lab Asstt and (4) Mst Sarwat lab asst in GGHS Koper were stopped because of the initiation of inquiry and lodging of FIR **Charge Not Proved.**

Charge 13 You being, Ex-DEO(F) Mardan are responsible for induction of fake employee of Mst Sarwat Lab Asstt.

Reply That I am not responsible for any kind of abetment and negligence at any stage as I have thoroughly explained above I tok firm action against the one Mst Sarwat Lab Asstt till my presence at the station. Ordered an enquiry and fowarded a request for FIR(Annexure A67) to the DPO however. I wass transferred from mardan that is why I was unable to proceed against the others, if I was involved at any stage I would not have made any action which clearly show my innocence in this regard.
Mst Sarwat had had been shown appointed in GGHS Koper Mardan but payment not made Charge not proved.

ATTESTED

Replies of Mst Rukhsana Raheem (Annexure E23-E36)

charge 1/3	You, although not part of district DSC Meetings, yet signed minutes of the meeting for appointments etc.
<p>Reply</p> <p><i>I was just titular part of District DSC Meeting. But DEO Never invited us in any meeting. She did all work related to appointment outside office especially (Misses Hanya) school. One at the meeting minutes of peon DEO requested me to sign paean meeting minutes although was not involved in any recruitment/ appointment proses. I accepted DEO request at that time senior clerk Sartaj brought meeting minutes for signature. He told that its class four meeting minutes this I sign it. After some time in noticed that he hide Ct meeting copy in it. Fraudulently he take my signature on CT. I complaint about that to honorable Director with reference No 1699 Dated 16/04/2020 when senior Clerk take fraudulehtly my signature on CT minutes this I informed Director with reference letter no 1748Dated 07/05/2020. I also forwarded copies to DC Mardan and Manger employee and exchange caved Mardan. Without this card same class four were recruited NAB inquiry was also under process in this matter. This I forwarded a copy to manger employ that I was not involved in any process regarding class.</i></p>	
<p>Conclusion</p> <p><i>Reply of the accused apparently seems convincing. As soon as she noticed certain irregularity in the minutes, she immediately complained both in writing and through SMS to the concerned authority for taking remedial measure. CHARGE NOT PROVED</i></p>	

Charge 2/4	you did not verify service documents of under transfer employees before activating their salaries.
<p>Reply</p> <p><i>I took charge of DDO and remained DDO wef 12.08.2020 to 30.11.2020 (3 Months 12 days). During the course of this period no under transfer teacher's service documents came to me for verification nor salary actvation.all the teachers and clerks appointed or transferred belong to high and higher secondary schools, that have their own DDOs. Mst Farzana Sardar had forbidden me to visit high and higher secondary school (Copy Attached). I remained DDO only for 3months and 12 days.</i></p>	
<p>Conclusion</p> <p><i>Transfer orders placed at B-27 till B-17 have been verified by the DEO (F) Mardan Office, however this does not exclude the possibility of the non verification of other transfer orders which according to verbal complaints are in hundreds. However the charge could not be proved with documentary evidence. CHARGE NOT PROVED</i></p>	

ATTESTED

Charge 3/5 You are responsible for fake appointment of Mst Asma CT.

Reply

1st of all I informed Director Sahib about the FAKE appointment of Mst Asma CT GGHS Moti Banda vide letter #4793 dt 29.10.2020 that was received by him personally (Copy attached) and vide SMS that is existing on record I informed director about all the 3 appointment orders of Asma CT that she on 14.09.2020 was transferred from GGHS Khanori malakand to GGHS Kotkey Mardan. Khanori exists in a far flung area of malakand I asked from DEO(F) malakand they replied that there was no Higher secondary school in khanori whereas only one girl primary school exists in khanori, SMS is existing on record . Then I informed director sb that in FTS two orders had been issued in respect of Mst Asma vide #104/G dt 11.05.2020 and #1706/G dt 11.05.2020. both the numbers are not existing in the record of DEO(F) mardan. All bogus appointees turn up in August 2020. and i reported them all to director in October 2020. after wards reports were submitted to Anti corruption and NAB. When this information of my reporting was sent to Mst Farzana Sardar she with the connivance of Mr Younas the brother of Mr Shokat MPA tried to defame my Position. Farzana sardar falsely refused to own the transfers of NTS teachers she made, disowning her own signatures. I sent the signature of Mst Farzana sardar to director sb for sending to forensic laboratory for verifcaion. that letter had been received by director himself. The signature over the citizen portal complaint had been put by Mst Farzana Sardar and is not photostated. You may verify that signs. In those days there was an enquiry going on in mardan headed by Mr Ishfaq Director ESRU I described some bogus appointments of Mr Ishfaq that infuriated Msi Farzana Sardar so she with the help of Mr Usman JC, (Whome you invited as witness against me during the course of our personal hearing) and who is the Personal Assistant of MPA Mashwani hatched conspiracy against me in MPA hostel that all these appointments have been made by Mst Rukhsana Rahim DDEO. Mr Ishfaq had come again for enquiry on 05.11.2020 on that very day the mother of Farzana had passed away, Mr Ishfaq asked me for the detail of bogus appointments so I handed over that annoyed Mst Farzana sardar. When Mr Ishfaq came again for enquiry on 16.11.2020 Mst Farzana sardar wrote against me in the last week of November or december whereas the bogus appointments had been unearthed in 2020. so with out spoiling time I informed director sb through sms and letters. why did Mst Farzana not report me in writing at that time. Asma CT was working in GGHS Kotkey and her salaries were being drawn from GGHS Moti Banda and Head Mistriss GGHS Moti Banda had given cheque collection/receipt authority from treasury of Mardan, to her fake JC immad . Asma CT P#is 952808 and has received no salary and arrears. On the intimation of Mst Sarwat bogus Lab Asstt I stopped the cheque of salalris and arrears in respectof Mst Asma CT. My job was reporting to the high ups which I did .Removal was the prerogative of DEO and Director. She was not removed rather she ran away and hide herself.

Conclusion *The accused was not on good terms with Mst Farzana Sardar, the then DEO (F) Mardan and had been excluded from the official hierarchy in the office of DEO (F). In fact most of the documentary documents reveals that most of the files were submitted by Mr. Sartaj dealing assistant for AT,DM,Qaria, -----direct to MST Farzana Sardar*

ATTESTED

20

DEO(F) without routing the same through proper channel i-e Superintendent, ADEO both primary and Secondary and Deputy DEO.
Charge Not Proved

Charge 4/6 Mr Israr, fake employee, got inducted with your advent while you were posted as DDEO, Mardan.

Reply

I was DDEO(F) Mardan wef 08/08/2019. DEO(F) Mardan was not allowing me any perform any official duty. DEO(F) Mardan was doing all the posting transfer through clerks. Allah is witnessed that I did not know whether Mr Israr is genuine or bogus. I have seen him in the office of the Higher secondary school Katlang. I have seen him at various places with the Miss Rabia, head mistress GGHS Moti Banda. Collection of cheques authority had been issued to Mr Israr JJC by Mst. Rabia I/C GGHS Kotkey. Mr Israr service card had also been signed by Mst Rabia. The service card of other bogus clerk Mr Imad JC also bears the signatures of Mst Rabia. Other two sisters of Bogus clerk Mr Imad JC named Mst Azra CT and Mst Maryam SST had also been appointed by Mr Israr JC. The cheque collection authority in respect of Mst Asma CT had also been issued by Mst Rabia to bogus Imad JC. I intervened well in time and stopped the cheque in treasury. Mst Rabia is supporting all the bogus Mr Israr, Mr Imad JC and Asma CT. When Mst Rabia is in Kotkey Mr Israr is accompanied by her and when she comes to GGHS Moti she draws the salary of Bogus Asma CT. I find out these bogus appointees in the way described below:-

Some one sent me the appointment order of Mst Sarwat. She had been appointed as Qaria in GGHS Shamoza. On 19th October some one filed a complaint on citizen portal that DEO is getting Rs50,000/= for each transfer. I wrote on that printed complaint to DEO that her frequent and repeated orders of transfer of teachers had made the condition of the district a worst as 6 schools were closed and 45 schools turned to single teacher and also wrote that you have appointed Mst Sarwat as Qaria without any advertisement and DPC. DEO had seen that letter. And had put her signature and said that she is not afraid of these complaints. On 22nd October a chowkidar called me on phone saying that a girl had been appointed in our school on laboratory assistant. I went to GGHS Kohi Barmol. As the school was far away so I could not reach well in time. I asked chowkidar about the address of Mst Sarwat Lab Asstt. I pressurized her that she will be jailed and FIR will be lodged against her. Sarwat was frightened so she handed over two other appointment orders one of Qaria and other of Lab Asstt the former had been issued on 13.10.2020 and the latter on 22.10.2020. Sarwat went on weeping saying that she is not the sole bogus other bogus have been appointed. My cousin Mst Nusrat CT, Mst Sumbal, Maryam and Asma have also been appointed. When I asked who did issue these orders she said that her order has been issued by Mr Israr JC. Then DEO(F) Mardan ordered an enquiry in the instant case. Sarwat had given in writing to enquiry officer Mr Arshad Hussain that when it was pointed out that the order of Mst Sarwat is bogus, on that day the brother of MPA Shokat named Younas, who is a clerk in GHS Alo, called Sarwat and her father to MPA Hujra and pressurized them not to name Mr Israr JC, otherwise her academic credentials will be spoiled and an FIR will be lodged against her and she will be jailed. Sarwat had recorded this statement in the office of the

ATTESTED

Anticorruption.(Attached) Two clerks of DEO office Mr Sartaj and Mr Murad were also present in the Hujra. Sarwat had admitted in front of all that her orders had been issued by Mr Israr JC. Then other bogus appointments were unearthed and I informed Director Mr Hafiz Ibrahim through SMS and in writing to him on 29.10.2020 that had been received by him personally. Farzana said that she is not afraid of anyone. Then I informed NAB of all bogus appointments. NAB replied to my letter and invited me to office. But I did not go there. I wrote a letter to Anti corruption on 19.11.2020 for lodging an FIR against Mr Israr JC along with the detail of bogus appointments made by Mr Israr JC. Anti corruption replied that an FIR had already been lodged against Mr Israr JC for putting the bogus signatures of Judge of Peshawar High court in 2018, but he was roaming freely till 2020, but after my complaint he was arrested on 21.02.2021 and is still in jail, as high court and supreme court had rejected his bail. Now Sarwat had also a witness against Israr in the court of Anti corruption establishment.

conclusion The accused was not on good terms with Mst Farzana Sardar, the then DEO (F) Mardan and had been excluded from the official hierarchy in the office of DEO (F). In fact most of the documentary documents reveals that most of the files were submitted by Mr. Sartaj dealing assistant for AT, DM, Qaria, -----direct to MST Farzana Sardar DEO(F) without routing the same through proper channel i.e Superintendent, ADEO both primary and Secondary and Deputy DEO. Charge Not Proved

Lubna Tauheed A questionnaire(Annexure A4) had already been served upon Lubna comprising of 10 questions including those questions reflected in the charge sheet. Mst Lubna replied (Annexure B15-B21) by her as follow. The first 5 charges are reflected in the charge sheet.

Charge 1/3:-Four fake employees were inducted while you were principal GGHSS Koper Mardan wef 06.03.2019 to 03.09.2020.

Reply :-
I did not allow four employees, I allow two namely Israr & Sumbal after following proper procedure of verification from the concerned office(DEO F).(Annexure C71)
Among the fake employees only two -i)Israr as J/c (Annexure A98)and ii) Sumbal as laboratory assistant took charge in GGHSS Koper.(Annexure B6) The transfer order of Israr was from directorate Peshawar that I received through post and I send it for verification to DEO(F) Mardan. The verification from DEO (F) was also received through post. Once verified from the concerned quarter I had no reason to refuse giving charge.
Similarly Sumbal had also an appointment order(appointed in deceased quota)

ATTESTED

29

signed by the then DEO(f) fwardan, and I verified it from the DEO (f).
The other two employee iii) Nusrat and iv) Karishma took charge after my transfer from that school. I left the school on 3-9-21 while Nusrat took charge in GGHS Koper as CT on 5-10-20 and Karishma as lab.assistant on 31-10-21. So the later two cases are not of my tenure.

Conclusion :-
Perusal of the record reveals that appointment order of Mr. Israr was sent to Directorate for verification vide letter no. 457/ dated 17/09/2019 . while the verification documents in respect of MST Sumbal could not be traced. Hence non verification of the documents of Mst Sumbal Lab Asst proves negligence of the accused. So far as induction is concerned, Lubna Tauheed is not responsible for induction/appointment. Payments to the Fake employees during her tenure could not be proved.
Mst Nusrat CT took charge on 05.10.2020 after her transfer from that school. Mst Lubna left the school on 3-9-21 while Nusrat took charge in GGHS Koper as CT on 5-10-20(AnnexureB22) and Karishma as lab.assistant on 31-10-21. So the later two cases are not of her tenure **CHARGE NOT PROVED**

Charge 2/4	you adjust fake employees in GGHS Koper Mardan while you were Principal of the school.
Reply	Both provide original appointment order, I verified the original appointment order from DEO (F). Nusrat CT took charge in October 2020 after my transfer GGHS Koper. Therefor Nusrat should excluded from charge sheet.(Annexure C71); I did not adjusted any fake employee, as I was/am not the appointing authority.
Conclusion	Same as conclusion of charge .1 ChargeNot Proved.

Charge 3/5	You being prinncipal of GGHS Koper Mardan, neither demanded original orders nor verified the same before release of salary of fake employee Mst Nusrat
Reply	I am not directly responsible sir, as I am not the appointing and transferring authority (Annexure C71) Nusrat took charge in GGHS

ATTESTED

23

	Koper after my transfer from that school. The then incharge miss Yadmin gave her charge. I did not gave her charge.
Conclusion	Same as conclusion of charge 1. <u>Charge Not Proved.</u>

Charge 4/6	You being EX-Principal GGHS Koper Mardan are directly responsible for etment andab negligence in the case of fake appointments
Reply	Allegation 5 is not related to me because I never performed duty as DEO (F) Mdn. (Annexure C72). Nusrat took charge(Annexure B22)in GGHS Koper after my transfer from that school. The then incharge miss Yadmin gave her charge. I did not gave her charge.
Conclusion	Same as conclusion of charge 1. <u>Charge Not Proved.</u>

Charge 5/7	3. You being Ex-DEO (F) Mardan are responsible for fake appointment of Mst Karishma Shah Lab Asstt.
Reply	I never perform duty as DEO Mardan, so this allegation is not related to me
Conclusion	<u>Charge not proved</u>

Naheed replies (E37) to questionnaire and conclusion of the committee

Only one question first was included in the charge sheet

Charge 1/3	You being incharge of GGHS Shamozaai Mardan are involved in induction of fake employee, Mst Azra CT. —
Reply	I don't know Azra. She did not receive charge from me.
Conclusion	Mst Azra as CT has been paid from GGHS Shamozaai wef 01.06.2019 till 30.11.2020 as per

ATTESTED

24

the source information under P# 952810 CNIC1610305976714. charge partially proved as it was her duty to have a check on expenditure but she failed to check and Mr Aqib Imroz JC was at liberty **CHARGE PARTIALLY PROVED.**

Niqab Reply (Annexure B23) to Questionnaire (Annexure A7)

Mr Niqab was having one charge in his charge sheet

Charge 1/3	You are responsible for fake appointment of Mst Asma CT.
Reply	That I am not responsible for any kind of fake appointment. The appointment order of Mst Asm CT BPS-15 is totally fake in all respect having fake/scanned sign along with bogus dispatch No. which has no record in the office register. It is worth mentioning that this illegal act can also be explained from this illegality that too different appointment orders of Mst Asma CT BPS-15 were made on the same date with different endorsement No. 104/G and 1706/G the said orders also bear two different initials which also shows the illegality. Likewise Mst Asma CT BPS-15 was also shown under transfer from other district GGHSS Khanori Malakand on dated 14.09.2020. vide Endtt#3143-35.(Annexure B1,B2)
Conclusion	Asma CT D/O Farman Ali has been inducted in the system on 13.05.2020 as CT with <u>three different appointment orders</u> one issued vide #1704/G(Annexure B2a) and the other vide #1706/G(B2b) and the third appointment was made through transfer from GGHSS Khanori Malakand (Annexure B1,B2) and payment was made to her till 31.10.2020 through P#952808 with CNIC#1610271860676. All this has been done by Mr Israr JC. CHARHE NOT PROVED

4/11

Replies(Annexure B26) in respect of Mr Sartaj SC dealing clerk of AT/TT/Qari/PET only now SC at GGHSS Khwaja Rashaka Mardan.

Charge 1/3	You did not verify the service documents of under transfer employees before activating their salaries.
Reply	That the issue in question is baseless against the fact. That the DEO (F) Office have verified each and every transfer order of other district made


ATTESTED

25

	through proper channel from the Directorate of Elementary & Secondary Education Peshawar and from the concerned District from where the teacher have been transferred before the issuance of the pay release of the concerned teachers accordingly as per rule
	Conclusion: Transfer orders placed at (B27- B71) have been verified by the DEO(F) Mardan. However this doesnot exclude the possibility of the non verification of other transfer orders which according to verbal complaints are in hundreds. However the charge could not be proved with documentary evidence.

Charge 2/4	You are responsible for fake appointment of Mst Asma CT.
Reply	That I am not responsible for any kind of fake appointment. The Appointment orders of Mst; Asma CT BPS-15 is totally fake in all respect having fake/scanned sign along with the bogus dispatch No. which has no record in the office register. Her salary was also not drawn. It is worth mentioning that this illegal act can also be explained from this illegality that two different appointment orders of Mst; Asma CT BPS-15 were made on the same date with different Endst No. 1704/G & 1706/G. The said orders also bear two different initial which also shows the illegality. Likewise Mst; Asma CT BPS-15 was also shown under transfer from other district GGHS Khanori Malakand on 14-09-2020 vide Endst No. 31430-35 from the school from where Mr. Israr Junior Clerk transfer is made. (Copies attached as Annex - "A", "B", "C")
Conclusion	02 orders in respect of Asma CT. Apperantly signed by MST Farzana Sardar (C24-C25) besides the one issued by Directorate C-26 are available on record no remedial steps whats so ever have been proposed/taken by he accused which shows his connivence/involment in the issue of fake appointment beyond any shadow of doughts. Charge Proved.

Charge 3/5	You are responsible for induction of fake employee Mst Sarwat Lab Asstt.
Reply	


ATTESTED

(96)

That I am not involved in any type of fake appointment in my tenure. The appointment orders of the Mst; Sarwat Lab Assistant is totally fake & factitious one having fake/scanned sign with the bogus dispatch Nos. The same have no record in office register. Two different appointment orders have been made on two different dates. The first order Endst No. 5051-56 dated 13-10-2020 is clearly fake one which is evident from the body of the appointment order where in it is written as "against the post of Certified Teacher (Qari) in (BPS-12/Rs. 13320-960-42120)". While the second order is of the Deceased Son's Quota which is also fake with bogus dispatch No. having no record in the office dispatch register. (Copies attached as Annex - "D", "E")

Conclusion

Mst Sarwat recorded her statement that Mr Israr JC prepared two appointment orders for her one as Qaria in GGHS Shamozaai and the other as Lab Asstt in GGHS Kohi Barmol. Latter on both the orders were found fake so both the orders were returned to Mr Israr JC so Mr Israr JC requested her not to mention his name and mention the name of Mr Fawad. After wards Mr Younas invited me and my father to the Hujra of Malak Shokat, MPA and pressurized us not to mention Mr Israr JC other wise they threatened me to spoil my academic credentials and an FIR will be lodged against me. At this moment Mr Murad SC and Mr Sartaj SC of the DEO office were also present(Annexure C69). However the charge could not be proved with documentary evidence.

Charge 4/6	You are responsible for induction of fake employee Mr Imad Khan JC DEO(F) office Mardan
<p>Reply</p> <p>That I am not responsible in the induction. However, the fake induction of Mr Israr Junior Clerk was disclosed to the office on his arrest by the law enforcement agencies. During checking the it was found that he was duly transferred from district Malakand and his transferred was also verified Vide Endst No 14120 dated 04/10/2020 from the concerned quarters. (Copy attach as Annex "F"). I am totally unaware of the appointment of Mr Inmad JC</p>	
Conclusion	<u>Charge Not Proved</u>

ATTESTED

(27)

Mr Nisar Replies(B72-75) to questionnaire already served upon Mr Nisar SC GGHSS Koper Mardan the first question/charge is existing in the charge sheet

Charge 1/3	You, being SC at GGHSS Koper Mardan are directly responsible for abetment and negligence in the case of fake appointments.
Reply	I did not include any fake employee because I was not appointment and transfer authority two fake appointment was made by Mr Israr JC at my tenure. Mr Israr is responsible for this fake appointment
comments	This was the whole responsibility of the senior clerk to have a check on illegal actions being done in his jurisdiction by his junior clerk. So he badly failed in carrying out his responsibility but the argument/ proof he presented in his support as he was not allowed to visit office due to corona gains gravity so the <u>Charge Proved.</u>

Questionnaire (Annexure A10 -A11)comprising 35questions including the three questions shown in the charges sheet issued to Mr Israr Junior clerk their Replies(Annexure B76-B79) and comments of the enquiry committee are as under

Charge 1/3	you, being clerk at GGHSS Koper Mardan are directly responsible for abetment and negligence in the case of Fake appointments.
Reply	I am not responsible for any kind of bogus appointment as I was not the competent officer.
Conclusion	Mr Israr is really not the competent authority rather he is a MAFIA/Eminence Grise. Doing these illegal appointments through transfer from other districts.

Charge 2/4	you are responsible for fake appointment of Mst Asma CT.
Reply	I am not aware of of the appointment of Mst Asma CT and have no information about.
conclusion	If he does not know Asma CT, how did he come to know that her salary had been issued from GGHS Moti Banda whereas the cheque had been returned, as he replied in question-8. <u>Charge FULLY Proved.</u>

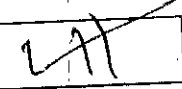
ATTESTED

28

Charge 3/5	you are responsible of induction of fake employee Mst Sarwat Lab Asstt.
Reply	No sir
conclusion	How does he say no if Mst Sarwat Laboratory assistant is her tenant as he responded in question #28. <u>Charge FULLY Proved.</u>

Murad SC Replies (Annexure B80) of the questionnaire (annexure A12) and conclusion regarding charges in respect of Mr Murad SC Mdn

Charge 1/3	You did not verify service document of under transfer employees before activating their salaries
Reply	That the issue in question is baseless against the fact. That the DEO (F) Office have verified each and every transfer order of other district made through proper channel from the Directorate of Elementary & Secondary Education Peshawar and from the concerned District from where the teacher have been transferred before the issuance of the pay release of the concerned teachers accordingly as per rules
Conclusion	Conclusion: Transfer orders placed at (B27- B71) have been verified by the DEO(F) Mardan. However this doesnot exclude the possibility of the non verification of other transfer orders which according to verbal complaints are in hundreds. However the charge could not be proved with documentary evidence.

Charge 2/4	You are responsible for fake appointment of Mst Asma CT. 
Reply	That I am not responsible for any kind of fake appointment. The Appointment orders of Mst; Asma CT BPS-15 is totally fake in all respect having fake/scanned sign along with the bogus dispatch No. which has no record in the office register. Her salary was also not drawn. Mst; Asma CT BPS-15 was also shown under transfer from other district GGHS Khanori Malakand on 14-09-2020 vide Endst No. 31430-35 from the school from where Mr. Israr Junior Clerk transfer is made. (Copies attached as Annex - "A")

ATTESTED

29

<i>Conclusion</i>	<i>Though the charge of fake appointments could not be proved with documentary evidence. However his negligence in the matter could not be ruled out.</i>
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<i>Charge 3/5</i>	<i>You are responsible of induction of fake employee, Msr Sarwat Lab Asstt.</i>
<i>Reply</i>	That I am not involved in any type of fake appointment in my tenure. The appointment orders of the Mst; Sarwat Lab Assistant is totally fake & factitious one having fake/scanned sign with the bogus dispatch Nos. The same have no record in office register. Two different appointment orders have been made on two different dates. The first order Endst No. 5051-56 dated 13-10-2020 is clearly fake one which is evident from the body of the appointment order where in it is written as "against the post of <u>Certified Teacher (Qari)</u> in (BPS-12/Rs. 13320-960-42120)". While the second order is of the Deceased Son's Quota which is also fake with bogus dispatch No. having no record in the office dispatch register. (Copies attached as Annex - "B", "C")
<i>Conclusion</i>	Mst Sarwat recorded her statement that Mr Israr JC prepared two appointment orders for her one as Qaria in GGHS Shamoza and the other as Lab Asstt in GGHS Kohi Barmol. Latter on both the orders were found fake so both the orders were returned to to Mr Israr JC so Mr Israr JC requested her not to mention his name and mention the name of Mr Fawad. After wards Mr Younas invited me and my father to the Hujra of Malak Shokat, MPA and pressurized us not to mention Mr Israr JC other wise they threatened me to spoil my academic credentials and an FIR will be lodged against me. At this moment Mr Murad SC and Mr Sartaj SC of the DEO office were also present(Annexure C69). <u>However the charge could not be proved with documentary evidence.</u>

<i>Charge 4/6</i>	<i>You are responsible for induction of fake employee Mr Imad khan JC DEO(F) office Mardan.</i>
<i>Reply</i>	That I am not responsible in the induction. The fake induction of Mr Israr Junior Clerk was disclosed to the office on his arrest by the law enforcement agencies. As per record he was shown duly transferred from district Malakand and his transferred was also verified Vide Endst No 14120 dated 04/10/2020 from the concerned quarters. (Copy attach as Annex "D")
<i>Conclusion</i>	<u>Charge Not Proved</u>

ATTESTED

Conclusion

- 1) Sumbal has been appointed as Laboratory Assistant (Annexure 262) in GGHS Koper Mardan CC Mr 6254 with other particulars as her CNIC# is 1610297012826, D/O Rahmat Khan P#932174 DOB 12.01.1998 DOA as 08.01.2020 her salaries were being sent to MCB Account #993507011000519 the bank key was 241848 her position code was not known that is why she was given integrated default post her pay is stopped at the moment.
- 2) The same Sumbal with a bit addition of Sumbal Israr has been appointed (Annexure 263) as SS in GGHS Koper Mardan CC Mr 6254 with other particulars as her CNIC# is 1610297012826, D/O Rahmat Khan P#954100 DOB 12.01.1996 DOA as 05.09.2019 her position code was not known that is why she was also given integrated default position her pay is stopped at the moment.
- 3) Like Mst Lubna a great many heads of schools don't know the basics of administration, training needs to be given to them before assigning the responsibility of the headship.
- 4) The committee, in the light of the remarks of Naheed SST GGHS Shamozaï during her personal hearing, decided to call Mr Aqib Imroz JC GGHS Shamozaï Mardan for personal hearing so a letter was issued to him vide Annexure D18, besides that two complaints one annexed as (D1) and the other the remarks of Mst Naheed who verbally stated that Mr Aqib Imroz was cutting deal with people for bogus appointment, her this very statement was fortified by the complaint handed over to the committee by Mr Farhad an aspirant of appointment in education who is now working in police his Mobile #03433093114.
- 5) Mst Naheed incharge GGHS Shamozaï charged Mr Aqib Imroz for releasing salaries of Mr Sultan Ali Chowkidar GGHS Shamozaï Mr Sultan Chowkidar was served with a show cause (Annexure D21) by the then DEO(F) Samina Ghani and had stopped the salaries of Mr Sultan Ali Chowkidar. But Mr Sultan Chowkidar salaries was released, that annoyed Naheed the incharge and wrote against his clerk Mr Aqib Imroz JC. Mr Aqib Imroz JC was served with a questionnaire (Annexure D22). An appeal/application (Annexure D23) was submitted by Mr Sultan Chowkidar accompanied by Mr Aqib Ali JC during the course of his personal hearing dated 22.12.2021.
- 6) The complainant had complained that his other brother had also been appointed in the education department under deceased son quota besides Mr Aqib Imroz. (Annexure D1) so his family members Mr Kabir S/O Shah Nazar (2) Zeenat Begum D/O Aimal Khan (3) Aqib Imroz S/O Kabeer Khan (4) Izaz Ali S/O Kabir Khan (5) Sameeullah Jan S/O Kabir Khan. The other inquiry already recommended may investigate this charge of 2nd son appointment.

- 7) When asked about Mst Azra CT (Annexure D2), the bogus appointee in GGHS Shamozaï Mr Aqib Imroz JC also disowned (04) employees that were on the pay role of GGHS Shamozaï mardan, so a letter was written to DAO Mardan for the detail of payment made to them (Annexure D25) beside the detail already sent by DAO (Annexure D2, D26).
- 8) Aqib Imroz JC shared his staff statement and vacant positions (Annexure D27, D28).
- 9) Aqib Imroz JC says that he was kept in dark while activating the salaries of Mr Sultan Chowkidar, and Mst Azra CT (Annexure D29). this clearly reveals that he is involved in the activation of salaries of both Mr Sultan and Mst Azra CT.
- 10) Mst Azra CT GGHS in Shamozaï with P#952810 is not existing in the conroller general of accounts pakistan islamabad DDOs open and filled posts in Shamozaï(Annexure D93)
- 11) Mst Farzana Sardar had included Mst Rukhsana Raheem DDEO in the DPC from SPST to PSHT and had also collected the sign of the latter over the minutes (Annexure D31 to D36) it is a matter of grave concern that Mst Rukhsana being local and having ties with locals made cutting in the promotion and adjustment making the situation from bad to worse as the deserving teachers were annoyed so the Mst Farzana Sardar DEO(F) constitute a committee headed by GGHSS No.2 Hoti Mardan so ameliorate the problem of wrong adjustment shown in th order (Annexure D37 to D41). As a consequence of this corrigendum was issued (Annexure D42).
- 12) Mst Rukhsana Raheem DDEO was a part of the process as is evident from note shett (Annexure D43-44).
- 13) The incharge DEO(F) Mardan Mr Idrees had written a complaint (Annexure D45) to Director E&SE KP that Mst Rukhsana Raheem was a part of the DSC but she latter erased her signs that made the documents suspicious.
- 14) Mst Rukhsana Raheem DDEO was also a part of CT appointment(annexure D46-47)
- 15) Mst Rukhsana Raheem DDEO has really cut her signatures (Annexure D48)
- 16) Mst Farzana Sardar DEO (F) has made Mst Rukhsana Raheem DDEO as part of every committee of departmental selection viz viz for CT (Annexure D49-50) for TT(Annexure D51-52).
- 17) Mst waheeda Naz SDEO(F) Takht Bhai has replied (Annexure D53-64).
- 18) Mst Shehla SDEO(F) Katlang has replied (Annexure E3-4).
- 19) It is to the astonishment of enquiry committee as to how a single teacher Mst Sumbal is being allotted two personal numbers one personal number 932174 as

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laboratory assistant and one as subject specialist as P#954100, and that both are existing on controller general of accounts Islamabad DDOs open filled posts(Annexure D67). one or both the personal numbers may be activated any time in future by MAFIA.

20) Mst. Rukhsana Rahim stated that a great many bogus employees have been inducted in the system among which she provided the name of Mst Shehnaz SS Pashto the daughter of Mr Taj Mohammad who was earlier working as PST in GGPS Hissar Banda Lunxhwar and then transferred to orakzai agency and came back as SST in Mardan tooru.

21) Mst Rukhsana Rahim stated that a great many bogus employees have been inducted in the system among which she provided the name of Mst suraya laboratory Assistant. She has been bogusly appointed in GGMS Haji abad Mardan.

22) Mst Rukhsana Rahim stated that a great many bogus employees have been inducted in the system among which she provided the name of Mst Kauser Parven. She was working in mohmand agency and then came to swabi and from swabi Mst Rukhsanana stated that she came to GGHS Katti grahi Mardan. Certain papers (Annexure D73-D92) regarding Mst Kauser Parveen were collected from her school that were critically scrutinized and it was found that she has once reported as SS in Islamiat by her principal while in rest of the documents she is ss in Pakistan studies. Critical examination and further investigation will disclose the actual position.

23) Mst Nasira PST (Annexure A84) GGPS Ahmad Saeed Kot Distt North Waziristan had been shown as transferred to GGPS Alam Koroona Lond khwar Mdn vide order #4228-32/34 dt22.02.2020. The committee scrutinized its papers(annexure D94-D100) and record its observations. DEO(F) Mardan has issued three letters vide her #2187,2188,2189 on 15.06.2020 (Annexure D94,95,96) to three different offices DEO(F) NWD,DAO NWD and Director. E&SE KP respectively. Among these letters DEO NWD responds on 17.06.2020 vide #5827 and receives in the office of DEO(F) Mardan on 22.06.2020 whereas the same has been marked to ADEO Primary on 20.06.2020(Annexure D97). The DAO had already been addressed by DEO (F) Mardan for verification of LPC vide her #2188 dt 15.06.2020 who responded with no stamp and number (Annexure D98-99) and Mst Farzan Sardar released her salaries (Annexure D100). it needs further verification as to the said teacher is genuine or otherwise.

24) Like wise the documents in respect of Mst Saira Mukhtiar PST GGPS Aman Tabar tribal district mohmand daughte of HABIB UL MUKHTAIR P#50312304 is also suspicious. The one annexed as E1 with a stamp "District Account Officer" where as the correct word is Accounts and not account.both of her particulars in mohmand and Mardan are the same like CNIC#1610104356790 DOB09.05.1993 DOA21.09.2016 and her Bank in mardan it is HBL with Key of the bank as 220441

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and account #7900591903 whereas in mohmand it was ABL with key as 830. it needs futher verification as to the transfer has been made through proper way or otherwise.

S#	Name	P#	Salary drawn	Cummulative total	Period	Inactive wef
1	M.Israr JC B-11 GGHS Koper Banda	926 918	Rs411318(19m onths)	Rs411318 /=	01.06.2019 to 31.12.2020	01.01.2021
2.	Nusrat CTB- 15GGHS Koper Banda	953 073	Rs55332(2Mon. ths)	Rs466650 /=	01.10.2020 to 30.11.2020	01.12.2020
3	SumbalL/Asst B-7GGHS Koper Banda	932 174	Rs211490(11M oths 24days)	Rs678140 /=	08.01.2020 to 31.12.2020	01.01.2021
4	MaryamSST B-16GGHS Koper Banda	932 315	Rs688144(21m onths)	Rs136628 4/=	01.04.2019 to 31.12.2020	01.01.2021
5	Sumbal Israr SSGGHS Koper Banda	954 100	Rs102832/=	Rs149611 6/=	05.09.2019 to 30.11.2020	01.12.2020
6	Azra CT GGHS Shamozai	952 810	Rs521880/=	Rs199099 6/=	01.06.2019 to 30.11.2020	01.12.2020
7	Asma CT GGHS Moti Banda	952 808	Rs162744/=	Rs215374 0/=	13.05.2020 to 31.10.2020	01.11.2020

25) A letter had been sent to DEO(F) Mohmand(Annexure A53) along with a list of (08) employees (Annexure A54) who had been on the pay role of DEO Mohmand and are now on the pay role of DEO(F) Mardan and asked DEO (F) Mohmand to convey the mode of their recruitment in Mohmand and mode of transfer to Mardan and also the mode of promotion of Mst Shaheen Aslam CT/SST.Mst Riaz Begum DEO(F) Mohmand disowned Mst Shaheen Aslam CT stating that she has no record in Mohmand district and submitted report on whatsapp (Annexure D19). The committee went to Mohmand asking DEO(F) to verify Mst Shaheen Aslam CT/SST record from accounts office Mohmand as the whatsapped letter had no sign. Mst Riaz Begum owned remaining Seven Employees(Annexure D20), and owned Mst Saheen Aslam CT(Annexure E5) admitting that Mst Shaheen Aslam CT had been working in Mohmand wef 01.11.2004 to 31.12.2012 under P#110439. Further investigation

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needs to be made as to the facts about Mst Shaheen Aslam CT are correct or otherwise while investigating her payment record in Mohmand district it was revealed that she had been appointed on 21.04.2001 whereas Mst Riaz Begum admits her payment wef 01.11.2004 to 31.12.2012. Where was she working during the period wef 21.04.2001 to 31.10.2004, as the Mohmand payment record shows her first appointment on 21.04.2001.

Recommendations:-

Utmost efforts were made to objectively fix responsibility in the form of whether charge proved or not in the conclusions, below each reply to the charges of each accused, save the one Mst Yasmeen SST (G) Ex-incharge GGHSS Koper Mardan who reportedly has passed away. The quantum of penalty may be imposed in the light of the nature of charge and its gravity. It is further recommended that:-

1. (07) separate FIR may be lodged against Mr Israr JC for illegalities committed by him in E&SED KP, the one that has already been lodged by Higher education as a consequence of which he is now a days in jail, photographs of his existence in jail (Annexure F 87-89). One FIR may be lodged by the Secretary to Government of KP E&SED KP for fakely appointing Mst Sumbal Israr as SS in GGHSS Koper and (06) others FIR may be lodged against Mr Israr by the DEO (F) Mardan 1st in case of appointing himself bogusly through transfer from GGHSS Khanori Malakand where there is no Girl Higher secondary school, and 2nd FIR each in case of direct induction of Mst Nusrat CT GGHSS Koper Mardan 3rd Mst Sumbal Lab Asstt GGHSS Koper Mardan 4th Mst Maryam SST GGHSS Koper Mardan 5th for appointing Mst Sarwat as Lab Asstt GGHSS Koper 6th for appointing Asma CT through transfer from GGHSS Khanori Malakand where there is no Higher secondary school (Annexure B1,2)

2. All the employees transfer orders listed in (Annexures 2-3,20,22-23 &25-32) issued by:-

a) Mst Farzana Sardar Ex-DEO(F) Mardan either with her own signature or with her scanned signatures mentioned in the lists above whose record was not available in the office, including the number of employees (19,4,25&127) respectively, may be cancelled by the sitting DEO in a single order.

3. Deputy commissioner Mardan May be asked to recover, under land revenue Act 1981, the embezzled amount of money that had already been paid to the following fake employees through their salaries.

a) Mr Israr Junior clerk GGHSS Koper Banda Mardan

Rs1469116/= may be recovered, through land revenue Act 1981, from Mr Israr JC GGHSS Koper Mardan village Moti Banda lund khwar takht bhai mardan The calculated amount is his own illegally drawn salaries for (19) months wef 01.06.2019

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to 31.12.2020 amounting to Rs 411318/= and that of Mst Nusrat CT GGHSS Koper for (02) months wef 01.10.2019 to 30.11.2020 amounting to Rs 55332/= Mst sumbal for (11) months and 24 days wef 08.01.2020 to 31.12.2020 amounting to Rs 211490/= Mst Maryam SST for (21) months wef 01.04.2019 to 31.12.2020 amounting to Rs 688144/= and Mst sumbal israr SS for (02) months wef 01.10.2020 to 30.11.2020 amounting to Rs 102832/=.

b) Mst Nusrat CT GGHSS Koper Mardan

Rs 55332/= may be recovered, through land revenue Act 1981, from Mst Nusrat CT GGHSS Koper for her illegal payment of (02) months wef 01.10.2019 to 30.11.2020 amounting to Rs 55332/=

c) Mst Sumbal LabAsstt GGHSS Koper Mardan

Rs 211490/= may be recovered, through land revenue Act 1981, from Mst Sumbal LabAsstt GGHSS Koper Mardan for illegally getting salaries for (11) months and 24 days wef 08.01.2020 to 31.12.2020 amounting to Rs 211490/=

d) Mst Maryam SST GGHSS Koper Mardan

Rs 688144/= may be recovered, through land revenue Act 1981, from Mst Maryam SST GGHSS Koper for illegal payment of salaries for (21) months wef 01.04.2019 to 31.12.2020 amounting to Rs 688144/=

e) Mst sumbal israr SS GGHSS Koper Mardan

Rs 102832/= may be recovered, through land revenue Act 1981 from Mst Sumbal Israr SS GGHSS Koper Mardan for her illegal salaries for (02) months wef 01.10.2020 to 30.11.2020 amounting to Rs 102832/=.

f) Mst Azra CT GGHS Shamoza P#952810 Rs521880/=

Rs 521880/= may be recovered, through land revenue Act 1981, from Mst Azra CT GGHS Shamoza bearing P#952810 for her illegal salaries of (18) months wef 01.06.2019 to 30.11.2020 amounting to Rs 521880/=

g) Mst Asma CT GGHS Moti Banda Mardan P#952808 Rs162744/=

Rs 162744/= may be recovered, through land revenue Act 1981, from Mst Asma CT GGHS Moti Banda bearing P#952808 for her illegal salaries of (05) months 19 days wef 13.05.2020 to 31.10.2020 amounting to Rs 162744/=

4. The Accountant General Office may be approached through relevant forum to take to task the staff of DAO Mardan, for:-

- a) Punching the source 1 of the following 07 inductees with out checking the relevant documents of newly inducted employees with specimen signatures of the issuing authority.
- b) The competent authority in E&SED KP may write to the AG KP to take to task the concerned DAO Mardan officials on whose "user name" / "pass word" these

7 computer sources 1 have been punched and personal numbers allotted to the bogus employees are negligent for not taking the basic considerations laid down for punching the new employees specially the one at S# 4 below in respect of Mst Sumbal once inducted as Laboratory Assistant with personal number P#932174 and then the same sumbal with a bit addition of Sumbal Israr at S# 3 as subject specialist with P#954100 with the same CNIC # . Both the salaries at the moment are inactive .

S#	Name, designation & station.	S#	Name, designation & station.
1.	Mr Israr JC GGHS Koper Mardan P#926918	5	Mst Azra CT GGHS Shamozaï paid from GGHSS Shamozaï P#952810
2.	Mst Sumbal LabAsstt GGHSS Kopeer P# 932174	6.	Mst Asma CT GGHS Kotki paid from GGHS Moti Banda P#952808
3.	Mst Sumbal israr Subject Specialist GGHSS Koper P#954100	7.	Mst Maryam SST GGCMHSS Katlang Pid from GGHSS Koper P#932315
4.	Mst Nusrat Bibi CT GGHS Kotki paid from GGHSS Koper P#953073		

C) For allotting new personal number to Mr Israr JC who has been shown as transferred from GGHSS Khanori Malakad. If Mr Israr JC was really working his personal number would have been there and there was no need of allotting new personal number as per sap system requirement why new personal number was allotted to Mr Israr JC.

D) Allotting new personal number to Mst Asma CT D/O Farman Ali has been inducted in the system on 13.05.2020 as CT who was also shown as transferred from GGHSS Khanori Malakand (Annexure B1,B2) and payment was made to her till 31.10.2020 through P#952808 with CNIC#1610271860676.

5. Another enquiry may be instituted to investigate :-

- Further Involvement of Mr Aqib Imroz JC GGHS Shamozaï Mardan besides that reported in the light of the complaint annexed as (D1,D9) ..Mst Naheed verbally stated that Mr Aqib Imroz was cutting deal with people for bogus appointment, her this very statement was fortified by the complaint handed over to the committee by Mr Farhad who introduced himself as police personnel with Mobile #03433093114.(Annexure D1).

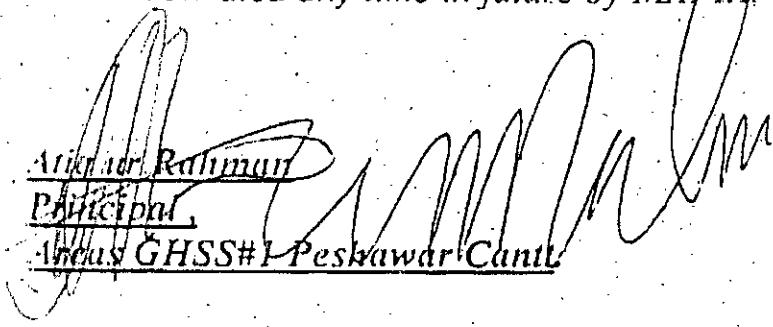
- ii. The complainant had complained that Mr Aqib Imroz JC GGHS Shamozai, other brother had also been appointed in the education department under deceased son quota besides Mr Aqib Imroz.(Annexure D1). This inquiry may investigate this charge of 2nd son appointment.
- iii. like wise a list of 31 employees(Annexure D65-66) among which 17 intra district transfer and 2 appointments against a single deceased son quota was handed over to the committee that included a complaint of two sons appointment of Maroof one named as Shah Hussain and the other as Rauf
- iv. And verify the genuineness of intra/inter district 63 transfers(Annexure D11-18) issued by Directorate of E&SE KP Peshawar especially the genuineness of 8 employees (Annexure A54) who came through Intra district transfer from Mohmand to various cost centers in Mardan specially Mst Shaheen Aslam who was CT in Mohmand and was posted as SET in Cost Center MR6158 in Mardan and who had been disowned by DEO(F) Mohamand (Annexure D19). It was latter revealed that Mst Riaz Begum DEO(F) had not signed D19. Mst Riaz Begum owned remaining Seven Employees(Annexure D20)
- v. The genuineness of transfer/induction/ appointment of the employees listed A15-A43
- vi. The genuineness of appointment made wef 01.01.2018 till 31.10.2021(Annexure A55-A59) in various schools, mentioned in the list, in Mardan.
- vii. Whether the decision/judgement on which 2 Sacked PSTs had been restored in service are among the genuine 17 shown in the judgement of Peshawar High court or tempering had been made by MAFIA in the judgement including others.
- viii. Investigate the position of Mst Kauser Parveen SS in Islamiat D/O Sakawat shah (Annexure D85) and SS in Pakistan sutdies(Annexure D86) and verscity of the papers (Annexure D73- D92). she is being paid out of GGHSS Katti Garhi Mardan CCMR6229 with CNIC#1610258612124 her DOB is 17.03.1975 whereas her DOA is 06.03.1996.
- ix. Further investigation needs to be made as to wether Mst Shaheen Aslam CT (Annexure D19-20) had been appointed on 21.04.2001, as shown in mohmand district payment record whereas Mst Riaz Begum admits her payment wef 01.11.2004 to 31.12.2012. now question arises as to where was she working during the period wef 21.04.2001 to 31.10.2004, as the Mohmand payment record shows her first appointment on 21.04.2001. it needs investigation as to how she was promoted to SST in mardan.(Annexure E5)
- x. Further probe needs as to whether the accused and bogus appointees were patronized by whom.


[Signature]
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38

It should be made binding upon all the DEOs male and female to Keep a clear cut record of posting transfer and appointment and in no case loose paper orders should be issued. In case of transfer of DEO the DEO in the proximity of the district may be asked to carry out an internal audit of the transfer posting and appointment. The latter will give a certificate to the effect that all the transfer posting and appointment made in the district are on the record.

Strict directions may be issued to the DEO (F) Mardan to direct all the Principals especially Principal GGHSS Koper Mardan, not to activate the salaries of Mst Sumbal either as a laboratory assistant with personal number 932174 or as a subject specialist with P#954100, as both are existing on controller general of accounts Islamabad DDOs open filled posts (Annexure D67) and may be activated any time in future by MAFIA.


Arif ur-Rahman
Principal,
Area GHSS#1 Peshawar Cantt.


Muhammad Ramzan,
Managing Director, Merged
Education Foundation


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ಕರ್ನಾಟಕ ಸರ್ಕಾರ
ಇಲಾಖೆ
ಸಂಖ್ಯೆ

ಶಿಕ್ಷಣ ಇಲಾಖೆ
ಬೆಂಗಳೂರು

ಪ್ರತಿ: ಶಿಕ್ಷಣ ಇಲಾಖೆ

ಇವು ಸಂಬಂಧಿಸಿದಂತೆ ಈ ಕೆಳಕಂಡಂತಿರುವ ವಿಷಯವನ್ನು ನಿರೀಕ್ಷಿಸಲಾಗಿದೆ
ಶಿಕ್ಷಣ ಇಲಾಖೆಯಲ್ಲಿ ಈ ಕೆಳಕಂಡಂತಿರುವ ವಿಷಯವನ್ನು ನಿರೀಕ್ಷಿಸಲಾಗಿದೆ
ಇವು ಸಂಬಂಧಿಸಿದಂತೆ ಈ ಕೆಳಕಂಡಂತಿರುವ ವಿಷಯವನ್ನು ನಿರೀಕ್ಷಿಸಲಾಗಿದೆ


ಇವು ಸಂಬಂಧಿಸಿದಂತೆ ಈ ಕೆಳಕಂಡಂತಿರುವ ವಿಷಯವನ್ನು ನಿರೀಕ್ಷಿಸಲಾಗಿದೆ
ಇವು ಸಂಬಂಧಿಸಿದಂತೆ ಈ ಕೆಳಕಂಡಂತಿರುವ ವಿಷಯವನ್ನು ನಿರೀಕ್ಷಿಸಲಾಗಿದೆ

ಇವು ಸಂಬಂಧಿಸಿದಂತೆ


SECTION OFFICER
(INQUIRY)

Copy forwarded for information to PS to Secretary, IASE Department, Mysore
(ಕಡತು)

ATTESTED


SECTION OFFICER
(INQUIRY)

SHOW CAUSE NOTICE

I, Mahmood Khan, Chief Minister, Khyber Pakhtunkhwa, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve on you, Mr. Sartaj (Senior Clerk), Office of DEO (Female) Mardan as follows: -

- 1. (i) That consequent upon the completion of the inquiry conducted against you by the Inquiry Committee for which you presented your written defense before the Inquiry Committee, and
- (ii) While on-going through the findings and recommendations of the Inquiry Officer/Inquiry Committee, the material on record and other connected papers including your defense before the Inquiry Officer/Inquiry Committee

I am satisfied that you have committed the following act/omission, specified in Rule-3(a&b) of the E&D Rules:

"Inefficiency / Misconduct"

2. As a result, thereof, I, as Competent Authority, have tentatively decided to impose upon you the penalty of Compulsory Retirement under Rule-4 of the said rules.

3. You are, therefore, required to show cause as to why the afore-mentioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

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

5. A copy of the findings of the Inquiry Officer/Inquiry Committee is enclosed

Malk
(MAHMOOD KHAN)
CHIEF MINISTER, KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY

Mr. Sartaj (Senior Clerk),
Office of DEO (Female) Mardan

ATTESTED

12/6/21



(411)

Annex "E"

To,

Mehmood Khan
Chief Minister
Khyber Pakhtunkhwa.

Subject: REPLY TO THE SHOW CAUSE NOTICE ISSUED DATED 26-04-2022
WHILE RECEIVED DATED 09-05-2022

Respectfully Shewth,

With due respect, I humbly submit in my defense the detail responses which will categorically explain my innocence in the instant case.

1. That I have served in Elementary & Secondary Education Department on various posts since 23-02-1993 initially as Junior Clerk, now I am serving as Senior Clerk at GHS Katlang on transfer from the DEO (Female) Office Mardan.
2. That I have served to the best of my ability, dedication, devotion, honesty and entire satisfaction of my superiors and there is no complaint/warning etc. against me till date which shows my innocence in this regard.
3. That I presented my defense in written form to the Inquiry Committee. Wherein I explained my Position/Role/Responsibilities and Duties at DEO (Female) Mardan Office categorically. (Copies Attached)
4. That it is also important to mention in my defense, that I was not involved in the induction of any of the Junior Clerk & Lab Assistants at any stage during my posting as Senior Clerk at the office of DEO (F) Mardan as I was Dealing Assistant only to the post AT, TT, DM, PET & Qaria at the office DEO (Female) Mardan.
5. That the allegation leveled against me is totally baseless against the fact that I performed my duties with full responsibilities during my stay at the office of the DEO (F) Mardan. I also verified each and every transfer order of other district made through proper channel from the Directorate of Elementary & Secondary Education Peshawar and from the concerned District before the issuance of the pay release of the concerned official as per rules as alleged against me during inquiry and presented the entire record to the inquiry officer. (Copies attached)
6. That I had performed my duties with efficiency, honesty and devotion to the utmost satisfaction towards my post.
7. That I also assure in all respect on oath that neither I nor any one of the office of DEO (Female) Mardan is involved in any kind of fake & factitious orders and it is clearly evident that the entire bogosity is done outside the office to defame the entire office by one Mr. Israr Junior Clerk and he is now arrested by the law enforcement agencies and is behind the bar in the instant cases.

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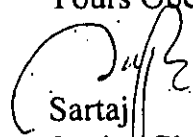
42

8. That as per the above facts I fully assure in all respect to your good self that I have not done any Misconduct & Corruption which is evident from my entire service record and have performed my duties with full devotion and honesty.
9. That I am ready to appear in person to your good office as when and where directed to explain my position in full in all respect and to explain my innocence in this regard.

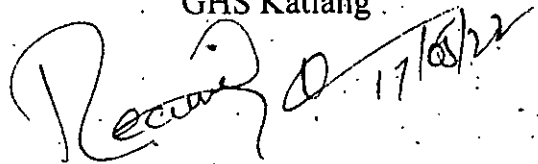
It is therefore requested that the allegation leveled against me may please be turn down as I am innocent in this regard and I may please be exonerated from the charges leveled against me. I will be very thankful.

Dated: 12-5-2022

Yours Obediently



Sartaj
Senior Clerk
GHS Katlang




ATTESTED



Dated Peshawar the November 24, 2022

NOTIFICATION

No. SO(Inq)ESSED/1-1/2022/Inquiry/DEO (F) Mardan: WHEREAS Mr. Sartaj Khan, Senior Clerk, O/o DEO (F), Mardan was proceeded against under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. **AND WHEREAS** Muhammad Ramzan (PCS SG BS-20) Managing Director, Merged Area Education Foundation and Mr. Atiq ur Rehman, Principal (BS-19), GHSS No. 1, Peshawar Cantt were nominated as Inquiry Committee to conduct Formal Inquiry under the ibid Rules, against Mr. Sartaj Khan, Senior Clerk, O/o DEO (F), Mardan, for the charges leveled against him.

3. **AND WHEREAS** the Inquiry Committee after having examined the charges, evidence on record and explanation of the accused, has submitted the report.

4. **AND WHEREAS** the Competent Authority (Chief Minister) after having considered the charges and evidence on record, inquiry report, explanation of the accused in response to the show cause notice and personal hearing granted to him by Secretary, Home & Tribal Affairs Department on behalf of the Competent Authority on 10.08.2022 is of the view that charges against the accused have been proved.

5. **NOW, THEREFORE**, in exercise of the powers conferred under section 14 (5) of the ibid Rules, the Competent Authority (Chief Minister), is pleased to impose major penalty of "Compulsory retirement" upon Mr. Sartaj Khan, Senior Clerk, O/o DEO (F), Mardan with immediate effect.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of even No. & Date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Mardan.
4. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
6. Incharge EMIS E&SE Department.
7. Mr. Sartaj Khan, Senior Clerk, O/o DEO (F), Mardan.
8. Office order file.

(Signature)
24/11/22

(Bilal Khan)

Section Officer (Inquiries)

(Signature)
ATTESTED

(44)

Annex "G"

D. No. 2680

2-12-2022

The Secretary
Elementary & Secondary Education Department
Khyber Pakhtunkhwa, Peshawar

Subject: APPEAL FOR RE-INSTATEMENT IN SERVICE

Respected Sir,

Kindly refer to the notification no. SO(Inq)ESED/1-1/2022/Inquiry/DEO(F) Mardan dated 24-11-2022, issued by E&SED Khyber Pakhtunkhwa Peshawar regarding my compulsory retirement by imposing the major penalty upon me.

I have to submit the following details about my innocence in the case titled: INQUIRY AGAINST DEO (F) MARDAN AND OTHER on the charges of irregular and illegal transfers of various categories of district Cadre employees and irregular, illegal direct induction of various category of employees in the system.

1. That I have served in Elementary & Secondary Education Department on various posts since 23-02-1993 initially as Junior Clerk, I served as Senior Clerk in the DEO (Female) Office from 01-09-2019 to 03-12-2020, now I am serving as Senior Clerk at GHS Katlang on transfer from the DEO (Female) Office Mardan.
2. That I presented my defense in written form to the Inquiry Committee. Wherein I explained my Position/Role/Responsibilities and Duties at DEO (Female) Mardan Office categorically. (Copies Attached)
3. That it is also important to mention in my defense, that I was not involved in the induction of any of the CT BPS-15, Junior Clerk & Lab Assistants at any stage during my posting as Senior Clerk at the office of DEO (F) Mardan as I was Dealing Assistant only to the post AT, TT, DM, PET & Qaria at the office DEO (Female) Mardan.
4. That the entire bogosity is done outside the office to defame the entire office by one Mr. Israr Junior Clerk and he is now arrested. The charges in this regard already been proved against him the report submitted to your good office. The same is also clear from the statements of the teachers of GGHS Moti Banda & GGHS Kotkey. (Copy Attached)
5. That I was not involved in any sort of appointment of Mst; ASMA CT BPS-15 as I was Dealing Assistant only to the post AT, TT, DM, PET & Qaria and the concerned Dealing Assistant of CT BPS-15 have already took action accordingly. After the same came in to the knowledge of the DEO (F) Mardan by District Account Officer Mardan vide letter No. DCA/MRD/ADMIN/2020-21/2018 dated 11-11-2020 regarding the status of the Appointment order of Mst; Asma CT, BPS-15. (Copy Attached)
6. That the concerned Dealing Assistant after checking the entire record conveyed the same to the DAO Mardan vide Letter No 4970 dated 14-11-2020 by the DEO (Female), that the appointment order of the Mst; Asma CT, BPS-15 totally fake &

ATTESTED

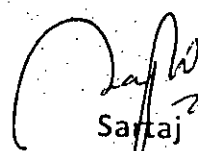
45

bogus and is not traceable in the record of this office nor any pay release order has been issued from this office. The salary of the said teacher is not released. (Copy of letter 4970 is attached)

7. That accordingly the inquiry Committee was also constituted to dig out the matter in all respect relating to the bogus appointment what so ever by the then DEO (Female) Mardan vide Endst No. 4976 / G Dated 16-11-2020. (Copy Attached)
8. That as per the above facts I fully assure in all respect to your good self that I have not done any Misconduct & Corruption which is evident from my entire service record and have performed my duties with full devotion and honesty.
9. In the inquiry report, the inquiry committee has mentioned that charge no. 1 & 3 has not been proved against me while it has been written that charge no. 2 has been proved which is quite wrong. No charge could be proved against an accused person in any stage without proof and documentary evidence.

In the light of above submission, it is humbly prayed that in the absence of any documentary proof, I may kindly be exonerated from the charges leveled against me and I may kindly be re-instated in service from the date of issue of my compulsory retirement.

Date: 30-11-2022


Sartaj
Ex-Senior Clerk
DEO (F) Mardan


ATTESTED

Annex "H"

OFFICE ORDER

The following officials duties are hereby assigned to the following Deputy District Education Officers as noted against the name of each in the best interest of smooth running of office.

No.	Name	Designation	Assigned duties
1	Rooh Ullah	BR/O	Financial Matters, Budget of over all
2	Mussarat Jabeen	ADEO Estab.	Over all supervision of GGMS, GGHS & GGHS
3	Mekhuar Khan	ADEO Primary	Over all Supervision of Sub Divisions
4	Rooh Ullah Jan	ADEO PP&D	Over all construction works & Funds
5	Shad Ali Khan	Assistant	All SSTs correspondence
6	Ichana Akbar	Assistant	All Principals, HMs, SS, SSS, DPEs, SIFEs, Librarian
7	Niqab Ahmad	Assistant	CTs correspondence
8	Fayyad Khan	C.O	OAMIS, IMU, IT, CT-IT, Biometric, Induction Prog
9	Sarfaraz	S/Clerk	AT, TT, DM, PET, Qaria
10	Mizan Noor	S/Clerk	PTC Funds, Conditional Grants etc
11	Munad Ali	S/Clerk	PSTs correspondence, PSTs GP Funds, Pensions
12	Ijaz Ali	S/Clerk	High & Higher Schools Autonomy, Pension Cases
13	Shahid Ali	S/Clerk	Accountant for Local Office
14	Bilal Hussain	S/Clerk	Accountant for Middle Schools
15	Naveed Shehzad	I/Clerk	Emails printing & replies, weekly Budget Execu
16	Muhammad Imran	I/Clerk	C-IV, Clerks, Laboratory Assistants
17	Shakeel	I/Clerk	CPD, Primary section correspondence
18	Javed Shah	IT Assistant	Pakistan Citizen Portal, Court Cases record
19	Muhammad Abbas	IT Assistant	PMRU, IMPS of DC Office
20	Raees Akhtar	DA Litigation	District Lower Courts cases
21	Liaqat Ali	DA Litigation	High Court Cases
22	Said	DA Litigation	Service Tribunal Cases
23	Nighar Omraz	SCT	Stipends record, Free Text Books record
24	Rahesha Joseph	SCT	Staff statements record, Vacant posts detail etc

(SHAMIM AKHTAR)
 District Education Officer (F)
 Mardan

Order No. 13384/G / Dated 17 / 12 / 2019

Copy to the:

1. Supdt: Local Office
2. ADEO Estab: secondary of local office is directed to hand over Computer system/Lap printer from your section to Mr. Shad Ali Khan Assistant.
3. All ADEOs local office
4. All DAs Local Office
5. All concerned

District Education Officer (F)
 Mardan

ATTESTED

(47)

POWER OF ATTORNEY

In the Court of Service Tribunal Peshawar

Say Taj } For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

Govt of KPK } Defendant
} Respondent
} Accused

Appeal/Revision/Suit/Application/Petition/Case No: _____ of _____
Fixed for _____

I/We, the undersigned/_____ do hereby nominate and appoint **YASIR SALEEM ADVOCATE HIGH COURT**, my true and lawful attorney, for me in my same and on my behalf to appear at _____ to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions, An appeal, statements, accounts, exhibits, Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that, I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the 14 day to 3 the year 2023
Executant/Executants _____
Accepted subject to the terms regarding fee _____

YASIR SALEEM

Advocate High Court

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR- 4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Mobile-0331-8892589, E-Mail: yasirsaleemadvocate@gmail.com