

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE**

**TRIBUNAL PESHAWAR**

**Service Appeal No. 1370/2022**


Anwar Zeb .....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through Secretary E&SE and  
others.....Respondents

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Respondent

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**Govt. of Khyber Pakhtunkhwa through Secretary E&SE and  
others.....Respondents**

**Para-wise comments /Reply on behalf of  
Respondents NO. 1 to 3**

**Respectfully Sheweth:**

**Preliminary Objections**

1. That the appellant has no cause of action/locus standi to file the present appeal.
2. That the appellant has concealed the material facts from this Honorable Court.
3. That the appellant has not come to this Honorable Court with clean hands.
4. That the appellant has filed the instant appeal on malafide grounds just to put pressure on respondent department.
5. That the appellant's Appeal is against the prevailing rules and law and terms and conditions of his appointment.
6. That the appellant is estopped by his own conduct to file the instant appeal.
7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue and also badly barred by time.
8. That the appellant was not appointed by lawful / competent authority. The Appointment order annexed by him is fake/ bogus and fabricated having no legal sanctity; hence the instant appeal is liable to be dismissed without any further proceeding.

9. That the appellant has neither taken over charge of DM at GHS Hatal Batkool nor performed duty for a single day. His demand is illegal and respondents are not bound to obey illegal demand of the appellant, hence the instant appeal is liable to be dismissed without any further proceeding.

### ON FACTS

1. Para No. 1 of the appeal is incorrect. The appellant was neither recommended by Departmental Selection Committee nor appointed by the lawful/competent authority and the appointment order annexed by him is fake/bogus and fabricated having no legal sanctity. No appointment order of Drawing Masters (DM) was issued on 16-04-2013 from District Education Office (M) Battagram while the post of DM at GHS Hatal Batkool was already filled by Fazal Mahbood DM. The appellant has made tempering in appointment order dated 11-03-2013. The appellant's name was even not included in merit list. Furthermore how was it possible that a person belonging to District Peshawar could be appointed in District Battagram against district cadre post. (Copies of dispatch register dated 1604-2013, copy of original appointment order of DM dated 11-03-2013 & merit list are annexed as *Annexure "A, B & C"*).
2. Para No.2. of the appeal is incorrect. The appellant was neither appointed by the lawful/competent authority nor he served/performed duty for a single day at GHS Hatal Batkool. He never remained on the strength of the said school. He is a stranger and there is no appointment order/service book of the appellant in that school. He neither took over charge/submitted arrival report nor marked his attendance in school register and even no

activation of pay was made by the then DDO. There is no source of his induction in that institution. His salary was activated through mal practices. He is bound to recover the amount to Govt. treasury drawn by him as salaries through mal practices. Moreover the single post of DM at GHS Hatal Batkool was already occupied by Fazal Maabood DM on 16-04-2013 who remained on the said post w.e.f 20-09-1992 to 03-08-2014. (Copy of Service Book attached by him is bogus. Report of Head Master GHS Hatal Batkool is *Annexed as annexure "D"*).

3. Para No.3 of the appeal is incorrect and denied details has been given in para No 1 and 2.
4. In reply to para No. 4 it is stated that the salary is attached with the work done by a civil servant, if there is no work then there is no pay while the appellant being a non civil servant received salaries (as admitted by him) unlawfully and without performing any duty, hence he is bound to deposit all the amount/salary he received through malpractices. Head Master (DDO) GHS Hatal Batkool was directed vide letter NO. 3122 dated 28-03-2017 to calculate total amount released to the appellant unlawfully as salaries and to approach to Anti Corruption Department to lodge FIR against him. (Copy of Letter addressed to Head Master GHS Hatal Batkool is annexed as *Annexure "E"*).
5. Para No. 5 of the appeal is incorrect. The appellant has neither submitted applications nor his applications could be considered/honoured being a non civil servant/employee of this Department. As per letter annexed by the appellant enquiry against

the appointment order of the appellant was asked. Whereas it has been confirmed that appointment order of the appellant is fake/bogus/fabricated and was not issued by lawful/competent authority.

6. Para No. 6 of the appeal is incorrect. The appellant neither approached to respondents nor has been aggrieved being a non civil servant. Hence he is not entitled for any type of relief. Rest of the para is pertaining to case history of the appellant.
7. Para No.7 of the appeal is correct to the extent that the inquiry initiated by the respondent on the directions of this Honorable Service tribunal. Vide notification No.6256-58 dated 06-10-2021 and the inquiry report submitted by the inquiry committee vide No.368 dated 06-12-2021 with the recommendations that "It is quite evident from all the above mentioned findings that Mr.Anwar Zeb has not been appointed by the DEO Male Battagram. The mention fact also proved that Mr. Anwar Zeb is just trying to deceive the department and mislead the Honourable Court.(Copy of notification of inquiry committee ,inquiry report are *Annexed "F& G"*).
8. Para No.8. is correct to the extent that the respondent issued office Order No.3084-90/establishment-P dated 04-06-2022 in the light of inquiry committee findings and recommendations and on the directions of Honorable Service Tribunal. (Copy of office order is annexed as *Annexure "H"*).
9. Para No.9 is correct. Needs no comments.

10. Para No.10 is as composed is incorrect and denied. Respondents rightly rejected the appeal of the appellant on the recommendations of inquiry committee and its findings.
11. Appellant has no cause of action/locus standi to file instant appeal.

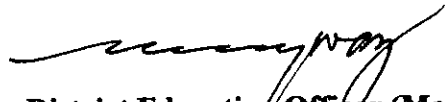
**ON GROUNDS:**

- A. Ground "A" of the appeal is incorrect and denied. Respondents acted according to the direction of Honourable Service Tribunal Judgment passed on 07-09-2021. Detail reply is give in the above paras.
- B. Ground "B" of the appeal is incorrect and denied. The appellant was neither appointed by lawful/competent authority nor he took over charge/performed duty for a single day, hence there is no need of charge sheet and show~~s~~ cause notice.
- C. Ground "C" of the appeal is incorrect, hence denied. Detail reply has been mentioned in preceding paras.
- D. Ground "D" of the appeal is incorrect, hence denied. The appellant is not a government employee nor on the strength of this department as stated in detail in the above paras.
- E. Ground "E" of the appeal as composed is incorrect and denied. Detail reply is given in the preceding paras.
- F. Ground "F" of the appeal is incorrect and denied. Respondents rightly rejected the appeal of the appellant. Detail reply is given in preceding paras.

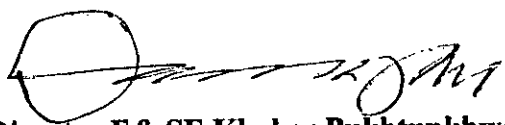
- G. Ground "G" of the appeal is incorrect and denied. Appellant's case was dealt in accordance with law and no discrimination of violation of the constitution was made. Detail reply is given in the above paras.
- H. Ground "H" of the appeal as composed is incorrect and denied. Detail reply is given in the above paras.
- I. Appellant has no cause of action. Respondents also seek gracious permission of this honourable court to raise other legal and factual grounds during the course of arguments.

It is therefore humbly prayed that on acceptance of above Para-wise comments, the appeal of the appellant may graciously be dismissed with cost and direction to the appellant to deposit the amount into Govt. treasury received by him as salaries unlawfully.

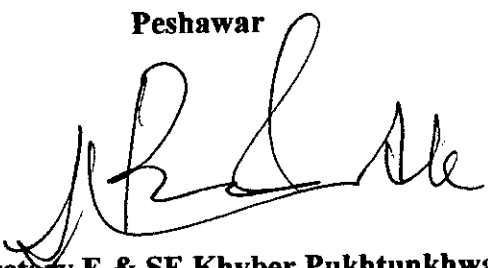
**RESPONDENT NO. 3**

  
District Education Officer (Male)  
Battagram

**RESPONDENT NO. 2**

  
Director E& SE Khyber Pukhtunkhwa  
Peshawar

**RESPONDENT NO. 1**

  
Secretary E & SE Khyber Pukhtunkhwa  
Peshawar

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**Govt. of Khyber Pakhtunkhwa through Secretary E&SE and  
others.....Respondents**

**AFFIDAVIT**

I Hafiz Muhammad Nawaz Abbasi District Education officer (Male) Battagram do hereby affirm and declare that contents of accompanying **Para-wise comments** on behalf of respondent NO. 1 to 3 are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.

  
DEPENDENT  
CNIC: 611018839553



# REGISTER OF ISSUES

Stamp Value (Rs.)

Remarks (record reference amount or stamps, etc.)

Subject or File No.

To whom and number of enclosures

Inward Register Daily or General No.

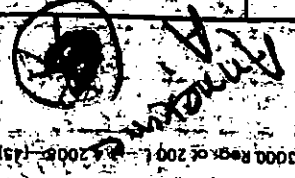
Branch

Serial No.

Serial No.	Branch	Inward Register Daily or General No.	To whom and number of enclosures	Subject or File No.	Remarks (record reference amount or stamps, etc.)	Stamp Value (Rs.)
8712	PH	15/4/2013		SDO (P) P. K. Reddy	Common for Muzer Khan Pet	
8713	PH	15/4/2013		SDO (P) P. K. Reddy	Common for Muzer Khan Pet	
8714	PH			Copy Commission for P. K. Reddy		
8715	PH			Controller of Exams Hyderabad		
8716	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8717	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8718	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8719	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8720	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8721	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8722	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8723	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8724	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8725	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8726	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8727	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8728	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8729	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8730	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8731	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8732	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8733	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8734	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8735	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8736	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8737	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8738	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8739	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8740	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
8741	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
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8751	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
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8775	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
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8777	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	
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8800	PH	15/4/2013		Director (P) P. K. Reddy	Common for Muzer Khan Pet	

... would furnish a certificate to the effect that the candidates have joined the posts, otherwise after 15 days of the issuance of this Order, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.

5- They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1989



885-86	"	"	Supp All Courses	Opening of PTC Accounts	EGAS Safety Shakedown
8803	PAO	16/4/2013	Manager NCR	Release of PTC	Account EGAS Safety Shakedown
8788	EMBE	"	EGHS Programme / AP met Shabhadh Patten.		
8790-92	ALB	"	EPF Sanction M. Shafige	Assessment / Issue of AP	
8793	ELBE	"	D.A.O Bhatnagar	Release of PTC	Assessment / Issue of AP
8794-97	"	"	All concerned	Correspondence order	AT. No 8718-22 Dated 16/4/2013
8798	BWH	16/4/2013	Manager HPI Bhatnagar	Change of PTC Secretary / Specimen Signature	
8799	BSYA	20	Var. Controller of Exam	Postmaster	Var. Location in PTC
8800-3	DVID	"	All concerned	Approval of EXCEL/EPF Training for Teachers	AT. No 8718-22 Dated 16/4/2013
8804-8	ELBE	16/4/2013	All concerned	APPOINTMENT ORDER	Female TTRP-15
8809-15	"	"	"	APPOINTMENT ORDER	Female PGT school
8816	ELB PR	17/4/2013	SDO on Duty Bhatnagar	Release of PTC	
8817	"	"	All concerned	Notification of ADA (M)	
8818	"	"	DD Investigation KRKesh	Notification of Ment Disable	
8819-20	"	"	All concerned	Sanction of PTC	
8821-25	"	"	All concerned	App't. CIV	
8826	ELB PR	18/4/2013	Controller of Examination Haryana	Appointment	C.T. MSC
8827	"	"	University Meerut		
8828	"	"	"	Memorandum	C.T. RA. BSC.
8828	"	"	Controller of Examination BISE Alwar	Memorandum	C.A. BSC.
8830-34	ELBE	18/4/2013	All concerned	APPOINTMENT ORDER	PTI (Female)
8835-37	"	"	"	Correspondence order	AT. No 8718-22 Dated 16/4/2013
8838-40	"	"	"	"	AT. No 8718-22 Dated 16/4/2013

5- They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1989.

Annexure  
'B'

P# 10

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.**

**OFFICE ORDER/APPOINTMENT**

Consequent upon the recommendation/ approval of the District selection Board BATTAGRAM in its meeting held on 27.12.2012. the Competent Authority is pleased to appoint the following fresh trained Male DM candidates on merit having the prescribed qualification in BPS 15(Rs.8500-700-29500) plus usual allowances as admissible under the rules against the vacant post of DM (Male) mentioned against each their names on regular basis under the existing policy of the Provincial Govt: on terms and conditions given below with effect from the date of their taking over charge in the interest of public service .

S.No	Candidate Name	Father's Name	Qualification	Score	Address	School/Station where posted	Remarks
1	Naseer Ahmad	Sher Dad	MSc DM	80.36	Ajmera Batagram	GHS Surgai	Against v/post
2	Saleh Ahmad	Rahim Gul	M.A DM	59.47	Pashto Allai	GMS Kosh Gram	-do-
3	Khursheed Ali Khan	Ahmad Rizwan	M.A DM	59.37	Rup Kani Allai	GHS Karag	-do-
4-	Saeed	Hazrat Alam	M.A DM	57.85	Thakot Batagram	GMS Bateela	-do-
5-	Satara Khan	Abdur Rehman	M.A DM	55.11	Kohani Batagram	GHS Ashar Ban	-do-

**TERMS AND CONDITIONS:**

- 1- Their services will be considered regular but without pension & gratuity in terms of section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in Such a manner and at such rates as prescribed by the Government.
- 2- The appointees who are already in Govt: service and working against a pensionable post on regular basis before 1<sup>st</sup> day of July 2001 without any service break, on application to the Competent Authority/this office through proper channel are appointed and allowed choice of option either to retain benefit of pension and gratuity as allowed to them under their previous terms of appointment or to avail the benefit of contributory provident fund allowed to them under new appointment.
- 3- Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.
- 4- The appointees should join their posts within 15 days of the issuance of this order. The Head master Concerned would furnish a certificate to the effect that the candidates have joined the posts, otherwise after 15 days of the issuance of this Order, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 5- They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1989.

PK 11

- 1- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 2- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the (E&D) Rules 2011 and the Rules framed from time to time.
- 3- They will not contribute any amount towards GP Fund; however contribution towards CP fund will be made as per rules.
- 4- They would produce age and health certificate from the concerned Medical Authority.
- 5- If the documents/domicile of the appointee found fake/bogus at any stage, He will be removed from the service immediately and a case will be registered against him in the Anticorruption department.
- 6- The DDO concerned will not activate the pay of the appointees till the verification of all the relevant documents.
- 7- The Competent Authority reserves the right to rectify the errors and omissions if any noted at any stage in the instant order issued erroneously.
- 8- No TA/DA will be allowed to the appointees for joining their duty.
- 9- Charge report should be submitted to all concerned.

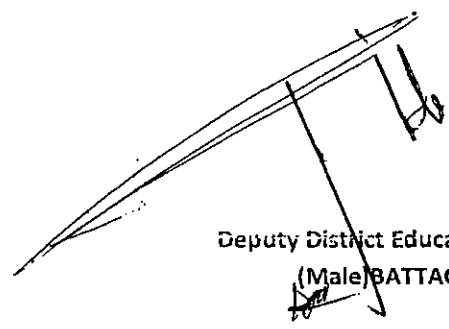
Muhammad Saeed  
District Education Officer  
(Male) BATTAGRAM.

Endst: No. 8178-83

Dated: 11/03 /2013

Copy to the:-

- 1- Director E&SE Department Khyber Pakhtunkhwa Peshawar.
- 2- The Deputy Commissioner Battagram.
- 3- District Officer (F&P) Battagram.
- 4- District Accounts Officer Battagram.
- 5- All Headmasters of concerned schools.
- 6- Candidates concerned.
- 7- Office File.



Deputy District Education Officer  
(Male) BATTAGRAM

Armaz  
C

(10)  
P#12

**OFFICE OF THE DISTRICT EDUCATION OFFICER ELEMENTARY & SECONDARY EDUCATION BATTAGRAM**

**REVISED TENTATIVE MERIT LIST OF CANDIDATES APPLIED FOR THE POST OF DM(M).**

S. No	Entry No.	Name of Candidate	Father's Name	Date of Birth	Domicile	ACADEMIC & PROFESSIONAL QUALIFICATION						Extra Marks FSc/BSc/ M.Sc (5+5+5)	Total Score	In-Service/ Fresh	Remarks
						SSC (20)	FA/FSc (20)	BA/BSc (20)	MA/MSc/ M.Ed (15)	DM (20)	M.Phil/ PhD (5)				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	75	Naseer Ahmed	Sher Dad	06/04/1985	Battagram	13.55	13.07	13.05	10.75	14.93	-	15	80.36	-	
2	79	Muhammad Ismail	Abdur Rehman	05/10/1981	Battagram	10.82	9.40	10.44	7.27	13.83	-	10	61.76	(Dropped)	Double Domicile
3	5	Saleh Ahmad	Rahim Gul	01/01/1984	Battagram	12.31	9.87	9.78	8.05	14.46	-	5	59.47	-	
4	40	Khursid Ali Khan	Ahmad Rizwan	01/01/1985	Battagram	11.65	12.56	10.00	9.27	15.88	-	-	59.37	In Service (Qari)	
5	10	Paristan Khan	Muhammad Miskeen	01/04/1983	Battagram	11.65	10.84	9.35	9.68	16.72	-	-	58.23	Double Domicile	
6	80	Saeed	Hazrati Azam	25/02/1988	Battagram	10.93	11.58	10.84	9.38	15.12	-	-	57.85	-	
7	26	Satara Khan	Abdur Rahman	05/08/1979	Battagram	12.00	10.71	10.98	7.94	13.48	-	-	55.11	-	
8	14	Ghulam Muhammad	Abdur Rasheed	20/11/1984	Battagram	12.21	9.84	11.56	8.20	12.98	-	-	54.79	-	
9	28	Abdul Ghaffar	Zareen	01/03/1985	Battagram	10.35	10.18	12.08	7.91	14.03	-	-	54.56	-	
10	44	Tasieem Khan	Rahim Dad Khan	01/01/1984	Battagram	9.98	9.33	10.47	7.39	16.28	-	-	53.45	In Service (P/Const)	
11	34	Abdus Salam	Haji Muhammad Ilyas	14/06/1972	Battagram	10.59	9.16	11.56	7.76	14.18	-	-	53.25	-	Over Age
12	4	Abdul Wahid	Muhammad Rafique	01/04/1982	Battagram	12.19	9.44	10.44	8.09	12.96	-	-	53.11	-	
13	35	Shah Khalid	Aziz ur Rehman	15/07/1984	Battagram	11.32	9.02	8.98	8.52	14.85	-	-	52.69	-	
14	38	Akhtar Nawaz	Musa Khan	03/02/1982	Battagram	12.02	10.76	9.53	-	14.08	-	5	51.40	-	
15	45	Babo Khan	Gul Khan	24/06/1972	Battagram	9.60	9.02	10.33	8.66	13.32	-	-	50.92	-	Over Age
16	9	Shafiq Ur Rehman	Ghazi Aman Ullah Khan	10/08/1983	Battagram	11.11	9.29	9.38	8.14	12.02	-	-	49.94	-	
17	54	Hazrat Islam	Muhammad Zanif	01/02/1975	Battagram	10.52	11.87	12.73	-	14.07	-	-	49.18	-	Over Age
18	65	Zia Ullah	Akbar Ali Khan	20/09/1988	Battagram	10.02	11.25	8.62	-	14.03	-	5	48.93	-	
19	32	Rizwan Ullah	Abdul Qayyum	01/02/1985	Battagram	11.08	11.49	12.25	-	14.04	-	-	48.87	-	
20	17	Amir Nawaz	Muhammad Zaria	09/10/1986	Battagram	12.612	8.4182	9.27273	-	12.54	-	5	47.84	-	

		Syed Rahman Shah	03/01/1986	Battagram	13.20	9.82	12.36	-	11.98	-	-	47.35		
22	1	Sharif Ullah	20/05/1978	Battagram	11.36	11.71	10.04	-	13.80	-	-	46.91		
23	3	Syed Shujahat Ali Shah	01/03/1990	Battagram	10.95	9.07	10.40	-	11.10	-	5	46.53		
24	24	Tufail Muhammad	17/09/1989	Battagram	11.90	9.80	9.78	-	15.02	-	-	46.51		
25	53	Nisar Ahmad	28/07/1987	Battagram	10.07	10.73	12.16	-	13.47	-	-	46.43		
26	6	Muhammad Mushtaq Khah	02/03/1985	Battagram	10.24	10.05	11.84	-	14.28	-	-	46.42		
27	30	Farman Ali	01/02/1990	Battagram	11.71	10.05	8.33	-	16.20	-	-	46.29		
28	50	Shariz Ullah	06/06/1985	Battagram	9.41	10.96	11.69	-	13.45	-	-	45.51		
29	36	Muhammad Afsar Shah	04/12/1976	Battagram	10.40	10.78	10.51	-	13.75	-	-	45.44		Over Age
30	63	Atiq Ur Rehman	22/02/1975	Battagram	11.81	10.11	10.43	-	12.57	-	-	44.92		Over Age
31	7	Muhammad Naeem	15/03/1983	Battagram	12.82	9.62	9.49	-	12.90	-	-	44.83		
32	11	Tahir Mehmood	20/04/1982	Battagram	9.69	9.22	11.05	-	14.20	-	-	44.17		
33	8	Saif Ullah	05/03/1991	Battagram	10.44	9.44	9.60	-	14.48	-	-	43.96		
34	13	Shah Wali Ullah Muffaker	16/06/1989	Battagram	10.51	10.04	8.73	-	13.02	-	-	42.29		
35	41	Ikramullah	04/06/1987	Battagram	9.76	7.87	11.69	-	11.08	-	-	40.41		
36	52	Alam Zeb	19/03/1982	Battagram	9.41	8.33	9.42	-	12.47	-	-	39.62		
37	60	Khalid Shah	13/05/1987	Battagram	9.98	8.56	7.89	-	10.12	-	-	36.55		

Prepared By *[Signature]*

Checked By *[Signature]*

*[Signature]*  
Deputy District Education Officer  
Elementary and Secondary Education  
Battagram

Annexure

D

P # 14



**OFFICE OF THE HEADMASTER GHS HUTAL BATKOOI ALLAI BATTAGRAM**

To,

The District Education Officer(M)

Battagram

Subject: **Provision of information of the Ghost employee**

Memo:

According to school record The following employee who received salaries from the cost center of the GHS Hotal Batkool Battagram never remained on the strength of this institution. He is stranger and there is no appointment order/ service book, nor he submitted arrival report neither marked attendance in the school register or any other documents in this office and even no activation of pay was made through source by the then DDO.

S.No	Personal No	Name of employee	Post	D.O.A	DDO code
1	00701737	Anwar Zeb	DM	16-04-2013	BM6082

Certified that the above noted employee is fake bogus and there is no source of their induction on this institution their salary was activated through mal practices.

More over dated 16-04-2013 the original employee Fazal Mabood was working as drawing Master at GHS Hotal Baktool Alli Battagram with effect from 20-09-1992 to 03-08-2014.

NO. 203

Dated: 22-02-2017

Headmaster 22-2-2017

GHS Hotal Batkool

Allai Battagram

Headmaster  
GHS Hotal Batkool  
Battagram



Office of The

**DISTRICT EDUCATION OFFICER(MALE) 'E'**

Email: emisbattagram@yahoo.com **BATTAGRAM** Phone # 0997311439 & 0997310670

No: 3122 /

Date 28 / 03 / 2017

**(B)**

P # 15

To

The Head Master  
GHS Hatal Batkool.

Subject; W/P NO. 344-P of 2017 Titled Anwar Zaib VS Govt; of KPK and Others

The subject Writ Petition has been filed by Mr. Anwar Zaib S/O Sher Rahman P/O Badabair Tehsile and District Peshawar in the Hon; Peshawar High Court wherein he admitted/confirmed that he received salaries for the months of June & October 2013 from (cost centre of) GHS Hatal Batkool under Personal NO. 00701737 claiming his appointment at that school.

As the said person is not a civil servant having not been appointed by lawful authority. His appointment order as DM at GHS Hatal Batkool District Battagram is fake, bogus, fabricated and has no legal sanctity. There is no record regarding his appointment order in this office as well as at GHS Hatal Batkool as confirmed by you vide your letter NO. 203 dated 22-02-2017. He is a ghost employee/stranger who never performed duty at GHS Hatal Batkool.

You (being DDO) are therefore directed to calculate total amount released to the said person unlawfully as salaries and approach to Anti Corruption Department to lodge FIR against him i.e Mr. Anwar Zaib as well as the then Drawing Disbursing Officer (DDO) under relevant section of law.

District Education officer (Male)  
Battagram

Endstt. NO. 3123-27

Dated 28 / 3 / 2017

Copy for information to the:-

1. Director Elementary & Secondary Education KPK Peshawar.
2. Deputy Commissioner Battagram.
3. Director Anti Corruption KPK Peshawar.
4. District Account Officer Battagram.
5. Circle Officer Anti Corruption Battagram.

District Education officer (Male)  
Battagram





OFFICE OF THE DISTRICT EDUCATION OFFICER (M)  
DISTRICT BATTAGRAM



emisbattagram@gmail.com



/deobattagram



0997543540 & 539

Annex:

'F'

P# 16

**NOTIFICATION**

In the light of Judgement passed by Honorable Service tribunal peshawar dated 07-09-2021 in service appeal No.155/18 the following committee is hereby constituted to conduct the inquiry regarding fake/bogus appointment on 16-04-2013 of appellant namely Mr. Anwar zeb as DM at GHS Huthal Bathkool within fifteen days positively.

- 1- Mr. Bakhtiar Muhammad Principal GHHS Paimal Sharif.
- 2- Mr. Najab Khan HM GHS Battamori.

-Sd-

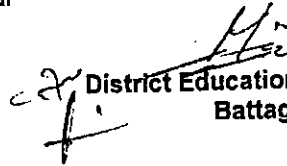
Muhammad Ashfaq Khan Jadoon  
District Education Officer (M)  
Battagram

Endst: No 6256-58 /EMIS:/HRMIS/2021

Dated 06/10/ 2021

Copy is forwarded for information to:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Registrar KP Service Tribunal Peshawar
3. Master File.

  
District Education Officer (M)  
Battagram

OFFICE OF THE PRINCIPAL GOVT: HIGHER SECONDARY  
SCHOOL PAIMAL SHARIF BATTAGRAM



Annex:  
"9"

No. 368

Dated: 6/12/2021

PH17

To

The District Education Officer (M)  
Battagram

Subject: Inquiry Report regarding Appointment of Mr. Anwar Zaib as DM at GHS Hatal Batkool

In Compliance with your Notification bearing Endst: NO. 6256-58 EMIS: /HRMIS/2021 Dated 06/10/2021, the undersigned along with Mr. Najab Khan Head Master GHS Battamori conducted the inquiry regarding the appointment of Mr. Anwar Zaib as DM at GHS Hatal Batkool.

BACKGROUND:

Mr. Anwar Zaib made a service appeal to the Honorable Service Tribunal Peshawar, claiming that he was appointed as DM at GHS Hatal Batkool District Battagram, and he is regularly performing his duty, but his salary has been stopped by the department. The Honorable Court in its decision announced on 07/09/2021, remitted back the matter to the department, with the direction to conduct inquiry into the matter, providing fair opportunity to the appellant of defending himself.

PROCEDURE:

1. The relevant record was scrutinized.
2. Statements of all concerned were sought.

FINDINGS:

1. The post of DM is purely a district cadre post. District Education Officers make appointments on vacant Posts of Drawing Masters (DM) of their districts on merit from among the candidates who are domiciled in the district concerned. Mr. Anwar Zaib belongs to District Peshawar, therefore he cannot be appointed as a DM in District Battagram as per rules.
2. The appointments order dated 16-04-2013, provided by Mr. Anwar Zaib is fake and fabricated (Annex-I). As per record of the office concerned (DEO Male Battagram) no appointment order of DM was issued on 16-04-2013 (Annex-II).

Bakhtiar Akhbar Ahmad Ajjum  
Principal  
GHSS, Faisal Sharif

Najab Khan  
Head Master  
GHSS Hattumot

The inquiry report is submitted for your kind perusal and further necessary action please.  
and misled the Honorable Court.  
The above mentioned facts also prove that Mr. Anwar Zaib is just trying to deceive the department  
appointed by the District Education Officer Male Battagram nor he performed duty at any school.  
It is quite evident from all the above mentioned findings that Mr. Anwar Zaib has neither been

CONCLUSION:

- officers on the given contact numbers.
- opportunity to the concerned person to defend himself, but he did not reply or contacted the inquiry
- 8. The undersigned vide this office letter No.364, Dated:19/11/2020 (Annex-VIII), provided a fair Accounts Officer Battagram submitted to the honorable Court(Annex-VII).
- concerned person was also a mal practice as evident from the Para wise comments of District
- 7. No copy of source of induction (source-I) was found in the school. The activation of Pay of the (Annex-VI) in R/O Mr. Anwar Zaib was found at the school.
- 6. No record: service book, appointment order, arrival report, name in teacher attendance register performed his duty for a single day at the school (Annex-V).
- Mr. Anwar Zaib is stranger for him and his staff, since he neither made arrival at the school nor
- 5. According to the record of the school and statement of the in-charge/ Head Master of the school possible for the CEO to appoint Mr. Anwar Zaib on a post already occupied.
- Drawing Master Mr. Faisal Mabood was already working on the DM post(Annex-IV). Then how it was
- 4. It is also pertinent to note that the post of DM was already filled on 16/04/2013 and onward, and a included in original appointment order(Annex-III).
- 3. The person under inquiry tampered the appointment order issued on 11-03-2013, his name is not

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.

P# 19

Annex-I

OFFICE ORDER/APPPOINTMENT

Consequent upon the recommendation/ approval of the District Selection Committee BATTAGRAM in its meeting held on 27.12.2012, the Competent Authority is pleased to appoint the following fresh trained male DM candidates on merit having the prescribed qualification in BPS 15 (Rs 3500-700-29500) plus usual allowances as admissible under the rules against the vacant post of D.M (Male) mentioned against each their names on regular basis under the existing policy of the Provincial Govt. on terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

S. N	Candidate Name	Father's Name	Qualification	Age	Address	School/Station where posted	Remarks
1	Naveed Ahmed	Sher Dad	MSc. DM	39.36	Ajmera Battagram	GHS Karg	Agamat what
2	Muhammad Farid	Abdur Rehman	MA, DM	51.70	Thakot Battagram	GMS Netar	do
3	Saleh Ahmad	Rahim Gul	MA, DM	54.47	Chakri Allah	GMS Kowloon	do
4	Khushtul Ali Khan	Ahmad Rehman	MA, DM	59.27	Hokhuni Allah	GHS Karg	do
5	Amwar Zaki	Sher Rehman	BA, DM	48.23	Peshawar	GHS Hotal Halkool	do
6	Saeed	Hazrat Azam	MA, DM	47.05	Thakot Battagram	GMS Seergal	do
7	Rahim Dad	Muhib Gul	BA, DM	45.11	Peshawar City	GHS Ashaban	do

TERMS AND CONDITIONS:

- Their services will be considered regular but without pension & gratuity in terms of section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- The appointees who are already in Govt. service and working against a pensionable post on regular basis before 1<sup>st</sup> day of July 2001 without any service break, on application to the Competent Authority/the office through proper channel are appointed and allowed choice of option either to retain benefit of pension and gratuity as allowed to them under their previous terms of appointment or to avail the benefit of contributory provident fund allowed to them under new appointment.
- Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.
- The appointees should join their posts within 15 days of the issuance of this order. The Headmaster concerned, would furnish a certificate to the effect that the candidates have joined the posts, otherwise after 15 days of the issuance of this Order, terming which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1959.
- They will be governed by such rules and regulations as may be issued from time to time by the Government.

(P.1-2)

Page 2

7

... ..  
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... ..

Muhammad Saad Khan  
District Education Officer (M&F)  
Bahawalpur

Ref: No. 2100/2013 Dated: 16/11/2013

Copy for information and necessary action to the:

- 1. ... ..
- 1. ... ..
- 2. Medical Superintendent III D ... ..
- 3. ... ..
- 4. All concerned.

  
 Dy. District Education Officer  
 Male & Female District Bahawalpur

# REGISTER OF ISSUES

Annex-II

(P-1-2)

Serial No.	Branch	Month/Quarter	To whom and number of certificates	Subject or Facts	Remarks (if any, amount of stamps, etc.)	Stamp Value (P)
87112	PH	12/11/13	SDA (C) P. K. ...	Compliance / ...		
87113	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87114	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87115	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87116-50	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87117-53	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87118-59	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87119	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87120	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87121	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87122	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87123	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87124	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87125	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87126	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87127	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87128	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87129	PH	12/11/13	PHSA Director ...	PHSA Director ...		
87130	PH	12/11/13	PHSA Director ...	PHSA Director ...		

... certificates would furnish a certificate to the effect that the candidate have passed the post, otherwise after 15 days of the issuance of this order, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.

They would be on probation for a period of one year extendable for another six year as provided in clause 5 of the Promotion and Transfer Rules 1953.

... certificates after 15 days of the issuance of this Order failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.

8758	FRS	11/1/72	Manager NCB	10/1/72	Approval of P/O	Acquiescence
8701-02	ALB	"	"	"	"	"
8753	FRS	"	"	"	"	"
8751-92	"	"	"	"	"	"
8758	GAH	11/1/72	Manager HPI	10/1/72	Approval of P/O	Acquiescence
8759	FRS	"	"	"	"	"
8800-3	David	"	"	"	"	"
8804-8	FRS	16/4/73	APR Collected	"	"	"
8809-15	"	"	"	"	"	"
8816	ELR	17/4/73	Special Pay	17/4/73	Approval of P/O	Acquiescence
2217	"	"	"	"	"	"
8918	"	"	"	"	"	"
89142	"	"	"	"	"	"
8921-2	"	"	"	"	"	"
8926	ELR	18/4/73	Controlled Examination	18/4/73	Approval of P/O	Acquiescence
8827	"	"	"	"	"	"
8828	"	"	"	"	"	"
8828	"	"	"	"	"	"
8830-31	ELR	18/4/73	APR Collected	"	"	"
8835-37	"	"	"	"	"	"
8839-40	"	"	"	"	"	"

... must surrender and furnish a certificate to the effect that the candidates have joined the post, otherwise after 35 days of the issuance of this Order, the candidates shall be deemed to have automatically and no subsequent appointment shall be entertained. They would be on probation for a period of one year extendable for another one year in the 1st/2nd Appointment. Provision as to 1st/2nd Appointment.

(P 2-2)

P # 23

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.**

**OFFICE ORDER/APPOINTMENT**

Consequent upon the recommendation/ approval of the District selection Board BATTAGRAM in its meeting held on 27.12.2012, the Competent Authority is pleased to appoint the following fresh trained Male DM candidates on merit having the prescribed qualification in BPS 15 (Rs.8500-700-29500) plus usual allowances as admissible under the rules against the vacant post of DM (Male) mentioned against each their names on regular basis under the existing policy of the Provincial Govt: on terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

S.No	Candidate Name	Father's Name	Qualification	Score	Address	School/Station where posted	Remarks
1	Naseer Ahmed	Sher Dad	MSc DM	80.36	Aymera Battagram	GHS Surgai	Against vacant
2	Saleh Ahmad	Rahim Gul	M A DM	59.47	Phyda Ahs	GHS Rosh Gram	-do-
3	Khurshid Ah Khan	Ahmad Rizwan	M A DM	57.37	Phyda Ahs	GHS Karag	-do-
4	Saeed	Hazrat Alam	M A DM	57.85	Phyda Ahs	GHS Bateela	-do-
5	Satara Khan	Abdur Rehman	M A DM	55.11	Khanan Battagram	GHS Ashar Bari	-do-

**TERMS AND CONDITIONS:**

- 1- Their services will be considered regular but without pension & gratuity in terms of section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2- The appointees who are already in Govt: service and working against a pensionable post on regular basis before 1<sup>st</sup> day of July 2001 without any service break, on application to the Competent Authority/this office through proper channel are appointed and allowed choice of option either to retain benefit of pension and gratuity as allowed to them under their previous terms of appointment or to avail the benefit of contributory provident fund allowed to them under new appointment.
- 3- Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.
- 4- The appointees should join their posts within 15 days of the issuance of this order. The Head master Concerned would furnish a certificate to the effect that the candidates have joined the posts, otherwise after 15 days of the issuance of this Order, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 5- They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1989.

(P-1-2)



- 6- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 7- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the (E&O) Rules 2011 and the Rules framed from time to time.
- 8- They will not contribute any amount towards GP Fund; however contribution towards CP fund will be made as per rules.
- 9- They would produce age and health certificate from the concerned Medical Authority.
- 10- If the documents/domicile of the appointee found fake/bogus at any stage, He will be removed from the service immediately and a case will be registered against him in the Anti-Corruption department.
- 11- The DDO concerned will not activate the pay of the appointees till the verification of all the relevant documents.
- 12- The Competent Authority reserves the right to rectify the errors and omissions if any noted at any stage in the instant order issued erroneously.
- 13- No TA/DA will be allowed to the appointees for joining their duty.
- 14- Charge report should be submitted to all concerned.

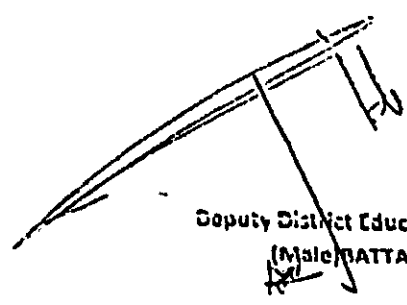
Muhammad Saeed  
 District Education Officer  
 (Male) BATTAGRAM.

Endst: No. 8178-83

Dated: 11/03 /2013

Copy to the:-

- 1- Director E&SE Department Khyber Pakhtunkhwa Peshawar.
- 2- The Deputy Commissioner Battagram.
- 3- District Officer (F&P) Battagram.
- 4- District Accounts Officer Battagram.
- 5- All Headmasters of concerned schools.
- 6- Candidates concerned.
- 7- Office File.



Deputy District Education Officer  
 (Male) BATTAGRAM

(Annex - 1)

رقم	الطواف الرضوى (S.E.T)			قسم نواز صبا (C.T)			ملاحظات
	أحد	الاثنين	الاثنين	الاثنين	الاثنين	الاثنين	
1							
2							
3							Spring Holidays
4							
5							
6							
7							
8							On duty
9	7:30	الطواف	1:00	الطواف	7:30	نواز	3:30
10	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
11	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
12	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
13	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
14							
15	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
16	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
17	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
18	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
19	7:30	الطواف	11:30	الطواف	7:30	نواز	7:30
20	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
21							
22	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
23	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
24	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
25	1:30	الطواف	1:00	الطواف	7:30	نواز	7:30
26	7:30	الطواف	11:30	الطواف	7:30	نواز	7:30
27	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
28							
29	7:30	الطواف	1:00	الطواف	7:30	نواز	7:30
30	7:30	الطواف	11:30	الطواف	7:30	نواز	7:30
31							

HEAD MANS  
 Govt. High School  
 Hudaib Bahari

DP No 144  
11-08-2015

(Annex - V)

P# 26

Education

The District Officer,

Battagram

Excellency Sir,

Subject: Inquiry regarding Anver Zaib (DM)

GHS Hatal Batkool.

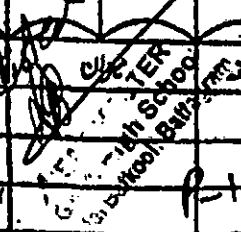
On the surprised visit of DEO (Male) Battagram and inquiry against Mr Anver Zaib (DM) today on 11.08.2015. The following facts are given to the best of my knowledge as incharge of GHS Hatal Batkool. I have act as incharge of the school since 14.2.2007. I have not known Mr Anver Zaib (DM) neither he took-over charge in this school nor any such appointment order has been received up till now

Ruzdi  
12/08/15

11-8-2015  
HEADMASTER  
Govt High School  
Hatal Batkool  
Battagram

مدرسی شیڈول (T.T)		مدرسی عوارض خانہ (S.A.T)		انتخابات (P.F.T)			نمبر
روز	تاریخ	روز	تاریخ	روز	تاریخ	تاریخ	نمبر
							1
							2
							3
							4
							5
							6
							7
							8
							9
							10
							11
							12
							13
							14
							15
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							17
							18
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							20
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							26
							27
							28
							29
							30
							31
تعمیرات	میران	سائز	مال	میران	سائز	میران	تعمیرات
اقتاری	-	-	-	-	-	-	اقتاری
انتخابات							انتخابات
پارٹی							پارٹی
میران							میران

Spring Holidays



Date		Time		Remarks	
1					
2					
3					
4					
5					
6					
7					
8	7:30	1:00	7:30	1:00	
9	7:30	1:00	7:30	1:00	
10	7:30	1:00	7:30	1:00	
11	7:30	1:00	7:30	1:00	
12	7:30	1:00	7:30	1:00	
13	7:30	1:00	7:30	1:00	
14					
15	7:30	1:00	7:30	1:00	
16					
17	7:30	1:00	7:30	1:00	
18	7:30	1:00	7:30	1:00	
19	7:30	1:00	7:30	1:00	
20					
21					
22	7:30	1:00	7:30	1:00	
23	7:30	1:00	7:30	1:00	
24	7:30	1:00	7:30	1:00	
25	7:30	1:00	7:30	1:00	
26	7:30	1:00	7:30	1:00	
27	7:30	1:00	7:30	1:00	
28					
29	7:30	1:00	7:30	1:00	
30	7:30	1:00	7:30	1:00	
31					

Spring Holidays

Date

Time

Remarks

Remarks

Remarks

Remarks

Remarks

Remarks

Remarks

Remarks

Remarks

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Remarks

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Remarks

Remarks

Remarks

12-2-12  
 Govt. High School  
 Huzar, Bahawalpur

روز	محمد نواز				S.S.T				وقت
	آؤ	سالی	دخلا	وقت	آؤ	سالی	دخلا	وقت	
1									1
2									2
3	7:30	11:00	دخلا	7:30	11:30	دخلا	7:30	1:00	3
4	7:30	11:30	دخلا	7:30	1:00	دخلا	7:30	1:00	4
5									5
6	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	6
7	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	7
8	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	8
9									9
10									10
11									11
12									12
13	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	13
14	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	14
15	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	15
16	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	16
17	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	17
18	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	18
19									19
20	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	20
21	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	21
22	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	22
23	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	23
24	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	24
25	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	25
26									26
27									27
28	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	28
29	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	29
30	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	30
31	7:30	1:00	دخلا	7:30	1:00	دخلا	7:30	1:00	31

Handwritten signature and stamp of the official.

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KIRAN

No.	Date	Time	Place	Activity	Remarks
31					
30					
29					
28					
27					
26					
25					
24					
23					
22					
21					
20					
19					
18					
17					
16					
15					
14					
13					
12					
11					
10					
9					
8					
7					
6					
5					
4					
3					
2					
1					

From 15th Jan to August 2013



تاریخ		آزاد	دعا	زمانی	دعا	آزاد	دعا	زمانی	دعا
1	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
2									
3	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
4	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
5	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
6	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
7									
8									
9									
10	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
11	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
12	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
13	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
14	7:30	اصوات	1:00	اصوات	7:30	اصوات	1:00	اصوات	7:30
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									

Summer Holidays

From 15th Jun to

31st August 2013

HEADMASTER  
Govt. High School  
Muz Balmukh, Balmukh

۲-۱۲

Sl. No.	Name	Age	Gender	Religion	Marital Status	Occupation	Signature	Remarks
1	...	...	...	...	...	...	...	...
2	...	...	...	...	...	...	...	...
3	...	...	...	...	...	...	...	...
4	...	...	...	...	...	...	...	...
5	...	...	...	...	...	...	...	...
6	...	...	...	...	...	...	...	...
7	...	...	...	...	...	...	...	...
8	...	...	...	...	...	...	...	...
9	...	...	...	...	...	...	...	...
10	...	...	...	...	...	...	...	...
11	...	...	...	...	...	...	...	...
12	...	...	...	...	...	...	...	...
13	...	...	...	...	...	...	...	...
14	...	...	...	...	...	...	...	...
15	...	...	...	...	...	...	...	...
16	...	...	...	...	...	...	...	...
17	...	...	...	...	...	...	...	...
18	...	...	...	...	...	...	...	...
19	...	...	...	...	...	...	...	...
20	...	...	...	...	...	...	...	...
21	...	...	...	...	...	...	...	...
22	...	...	...	...	...	...	...	...
23	...	...	...	...	...	...	...	...
24	...	...	...	...	...	...	...	...
25	...	...	...	...	...	...	...	...
26	...	...	...	...	...	...	...	...
27	...	...	...	...	...	...	...	...
28	...	...	...	...	...	...	...	...
29	...	...	...	...	...	...	...	...
30	...	...	...	...	...	...	...	...
31	...	...	...	...	...	...	...	...

IRADNAS  
 Govt. High School  
 Huzarabad  
 12/7

تاریخ		ساعت		مکان		نوع		توضیحات	
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
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18									
19									
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21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									
مجموع	مکان	ساعت	مکان	مکان	مکان	مکان	مکان	مکان	مکان
مجموع									
مجموع									
مجموع									
مجموع									

Handwritten notes and signatures in the center of the table, including the name 'Saman' and various illegible scribbles.

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الطاقف الرضويين		الطاقف الرضويين		الطاقف الرضويين		الطاقف الرضويين		الطاقف الرضويين	
رقم	اسم	رقم	اسم	رقم	اسم	رقم	اسم	رقم	اسم
1	...	2	...	3	...	4	...	5	...
6	...	7	...	8	...	9	...	10	...
11	...	12	...	13	...	14	...	15	...
16	...	17	...	18	...	19	...	20	...
21	...	22	...	23	...	24	...	25	...
26	...	27	...	28	...	29	...	30	...
31	...								
Eid Holidays from 1st to 18th October									
18	...	19	...	20	...	21	...	22	...
23	...	24	...	25	...	26	...	27	...
28	...	29	...	30	...	31	...		

HEAD MASTER  
Govt. High School  
Hudaib, Bahigah

8.9.12

2013		اسم				افتخار احمد خان صاحب			
موسمی کثرتتہ صاحب		موسمی صورت خان صاحب				P.E.T			
روز	تاریخ	وقت	وقت	وقت	وقت	وقت	وقت	وقت	وقت
1	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
2	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
3	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
4	12	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
5	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
6									
7	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
8	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
9	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
10	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
11									
12	21	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
13									
14									
15	Eid ul Azha vacation								
16	from 15 to 18/10								
17	October								
18									
19	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
20									
21	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
22	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
23									
24	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
25	12	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
26	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
27									
28	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
29	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
30	2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
31	12	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30
مجموع	7								
مجموع	2								
مجموع	12								

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مولوی محبوب خان صاحب  
S.A.T

افتخار احمد خان صاحب  
P.E.T

ردیف	تاریخ	آدم	سائی	رجسٹر	آدم	سائی	رجسٹر
1	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
2	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
3							
4	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
5	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
6							
7	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
8	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
9							
10							
11	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
12	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
13	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
14							
15							
16	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
17							
18	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
19							
20	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
21	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
22	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
23	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
24							
25							
26							
27	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
28	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
29	8/30	افتخار	افتخار	8/30	محبوب خان	محبوب خان	8/30
Tournament vacation (prohibited)							

HEAD MASTER  
Govt. High School  
Bhalwal

تاریخ		وقت		مہنگانہ		نومراں		طریقہ	
روز	تاریخ	وقت	مہنگانہ	نومراں	طریقہ	روز	تاریخ	وقت	مہنگانہ
	1	8:30	2:00	مہنگانہ	قلم				
	2	8:30	2:00	مہنگانہ	قلم				
	3	8:30	2:00	مہنگانہ	قلم				
	4	8:30	2:00	مہنگانہ	قلم				
	5	8:30	2:00	مہنگانہ	قلم				
	6	8:30	2:00	مہنگانہ	قلم				
	7	8:30	2:00	مہنگانہ	قلم				
	8	8:30	2:00	مہنگانہ	قلم				
	9	8:30	2:00	مہنگانہ	قلم				
	10	8:30	2:00	مہنگانہ	قلم				
	11	8:30	2:00	مہنگانہ	قلم				
	12	8:30	2:00	مہنگانہ	قلم				
	13	8:30	2:00	مہنگانہ	قلم				
	14	8:30	2:00	مہنگانہ	قلم				
	15	8:30	2:00	مہنگانہ	قلم				
	16	8:30	2:00	مہنگانہ	قلم				
	17	8:30	2:00	مہنگانہ	قلم				
	18	8:30	2:00	مہنگانہ	قلم				
	19	8:30	2:00	مہنگانہ	قلم				
	20	8:30	2:00	مہنگانہ	قلم				
	21	8:30	2:00	مہنگانہ	قلم				
	22	8:30	2:00	مہنگانہ	قلم				
	23	8:30	2:00	مہنگانہ	قلم				
	24	8:30	2:00	مہنگانہ	قلم				
	25	8:30	2:00	مہنگانہ	قلم				
	26	8:30	2:00	مہنگانہ	قلم				
	27	8:30	2:00	مہنگانہ	قلم				
	28	8:30	2:00	مہنگانہ	قلم				
	29	8:30	2:00	مہنگانہ	قلم				
	30	8:30	2:00	مہنگانہ	قلم				

30 -  
 31 -  
 14  
 10  
 4  
 I  
 holiday  
 14  
 10  
 4  
 I





P# 39  
(Annex - VII)

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. 344/2017

Mr. Anwar Zaib

Versus

Government of Khyber Pakhtunkhwa etc

PARA-WISE COMMENTS ON BEHALF OF DISTRICT  
ACCOUNTS OFFICER, BATTAGRAM

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:

1. That the petitioner has not come to this Hon'ble Court with clean hand.
2. That the petition is hopeful time barred and is liable to be set aside.
3. That the petitioner is liable to be set aside due to mis-joinder and non joinder of necessary parties.
4. That this Hon'ble Court has no jurisdiction to sue the above titled Writ Petition.

ON FACTS:

1. Subject to proof.
2. No Comments
3. That the pays and allowances without proper justification Source-II payment against personal No.00701737 made to the petitioner ghost employee collusively and concerned officials of Education Department i.e. Mr. Ali Rehman Junior Clerk GIS Huzal Bakoal and Ashaban committed obscursion and consequently

P1-3



dismissed from service by the education department likewise the concerned dealing staff of district Account Office Hattagram misusing authority was dismissed from service by Secretary Finance Department Government of Khyber Pakhtunkhwa Peshawar on 18/01/2017 a case is subjudice NAB Court. (Copies are Annexure "A" & "B").

- 4. That the HR (Human Resources) Master Data is changeable and the concerned key punch operator have illegally paid the salary and allowances to the petitioner at personal No.00718806 at GHS Asharban Allai District Hattagram the said K.P.O. on the adaptation of self made/fictitious entry into the SAP system is dismissed from service by the competent authority i.e. Secretary Finance on 18/01/2017 and the case against him is subjudice in the NAB Court.
- 5. Incorrect No application has been received by this office.
- 6. No related to answering respondent.
- 7. As per narrated para No.4
- 8. Incorrect
- 9. Petitioner has no locus standi to file present Writ Petition against respondents.

GROUND

- A. Incorrect
- B. As stated above.
- C. As explained in para 3 & 4 above.
- D. No comments.

- No Show Cause  
- No dismissal order

E. Incorrect.

F. The SAP (HR) master data was changed illegally without proper justification submission - II in SAP System made in un

authorized payment to the petitioner (Ghost employee). The competent authority imposed Gross penalty against dealing hand on 15-01-2017 on account of misusing authority.

G. Incorrect.

H. No comments

It is therefore submitted as the pray of petitioner is wrong. therefore the writ petition may kindly be dismissed.

*On 12.11.17*  
DISTRICT ACCOUNT OFFICER  
Battagram, Respondent No.2

VERIFICATION.

I Saif-ur-Rehman Assistant Accountant BPS-16 office of the District Account Officer Battagram do hereby verified that the contents of fore-going reply are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this honorable court.

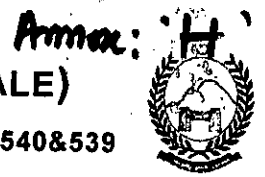
*SAIF UR REHMAN*  
SAIF UR REHMAN  
(DEPONENT)

P3 - 3



# OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE)

EMAIL: emisbattagram@gmail.com **BATTAGRAM** PHONE NO:0997543540&539



PH 42

## OFFICE ORDER

**WHEREAS** you Mr. Anwar Zeb s/o Sher Rehman R/O Afridi Abad Village Kaga Wala Ali Zai P/O Badbher Tehsil & District Peshawar were proceeded for having inducted yourself in this (E&SE) Department through fabricated / fake and bogus appointment order not issued by the lawful authority and having no legal sanctity.

**AND WHEREAS** you filed Writ Petition No: 344-P/2017 which was dismissed by Honorable Peshawar High Court Peshawar on 24-10-2017.

**AND WHEREAS** the Head Master GHS Hatal Batkool confirmed vide letter No: 203 dated 22-02-2017 that you you are fake , bogus and there was no source of induction.

**AND WHEREAS** the then DEO (Male) Battagram has sent letter to Head Master GHS Hatal Batkool vide No: 3122 dated 28-03-2017 regarding calculation of amount released to you and approach to Anti Corruption Department to lodge FIR.

**AND WHEREAS** you filed **Service Appeal No. 155/2018** in Khyber Pakhtunkhwa Service Tribunal Peshawar.

**AND WHEREAS** the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar passed judgement in Service appeal No. 155/2018 which is reproduced as under:

**"the matter is remitted back to the respondents with the directions to conduct proper inquiry into the same within a period of 90 days from the receipt of copy of this judgment. The appellant shall be associated with the inquiry proceedings by providing him fair opportunity of defending himself. In view of peculiar facts and circumstances of the case, no order for release of salary of the appellant could be passed at this stage, which of course would be subject to outcome of inquiry. The appeal in hand is disposed of accordingly. Parties are left to bear their own costs"**

**AND WHEREAS** inquiry notification was issued vide Endstt: No: 6256-58 dated 06-10-2021.

**AND WHEREAS** the inquiry committee submitted report vide No: 368 dated 6-12-2021. Recommendations of the committee are as under:

**" It is quite evident from all the above mentioned findings that Mr. Anwar Zaib has neither been appointed by the DEO (Male) Battagram nor he performed duty at any school. The mentioned facts also proved that Mr. Anwar Zaib is just trying to deceive the department and mislead the Honorable Court."**

**AND WHEREAS** the inquiry report was sent to the Registrar KP Service Tribunal Peshawar vide letter No: 8368 dated 23-12-2021 vide Post Office Registry No. RGL58137435 dated 24-12-2021.

**AND WHEREAS** you filed E.P No. 384/2021 which was received on 10-02-2022 and date for hearing was fixed 09-03-2022 but due to the retirement of Honorable Chairman the Tribunal was defunct and now date of hearing is 06-06-2022.

**NOW THEREFORE** in the light of enquiry report submitted Vide No: 368 dated 06-12-2021, findings & Proceedings initiated against you on the directions of Honorable Service Tribunal Peshawar in Service Appeal No.155/2018 dated 07-09-2021 & supporting documentary evidence / record placed on file is more than sufficient, hence the undersigned being Competent Authority is of the opinion that your fake / bogus / fabricated appointment order is declared as

**"NULL & VOID / VOID AB INITIO".**

**District Education Officer (M)  
Battagram**

Endstt: No: 3084-90 / Establishment (P) Dated 04/06/2022

Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Registrar KP Service Tribunal Peshawar.
3. Deputy Commissioner Battagram.
4. District Accounts Officer Battagram.
5. Head Master GHS Hatal Batkool.
6. Mr. Anwar Zeb s/o Sher Rehman R/O Afridi Abad Village Kaga Wala Ali Zai P/O Badbher Tehsil & District Peshawar
7. Office copy.

**District Education Officer (M)  
Battagram**