



27.02.2023

Appellant in person present. Mr. Naseer-ud-Din Shah,
Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his
counsel is busy in the august Supreme Court of Pakistan. Adjourned.
To come up for arguments on 15.03.2022 before the D.B. P.P given
to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)


15th March, 2023

Learned counsel for the appellant present. Mr.
Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant seeks adjournment on
the ground that he has not prepared the brief of the instant
appeal. Adjourned. To come up for arguments on 08.05.2023
before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Salah-ud-Din)
Member (J)


(Kalim Arshad Khan)
Chairman


10.11.2022


Junior to counsel for the appellant present.

Naseer Ud Din Shah learned Assistant Advocate General for the respondents present.

Former requested for adjournment on the ground that his senior counsel is busy before Hon'ble Peshawar High Court. Adjourned. To come up for arguments on 19.12.2022 before the D.B.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)

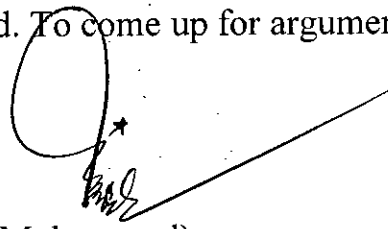

(Rozina Rehman)
Member (J)

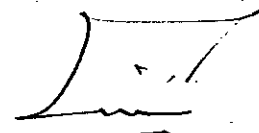
19.12.2022

Learned counsel for the appellant present. Mr. Abdul Jameel, Assistant alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 27.02.2023 before the D.B.

SCANNED
KPST
Peshawar

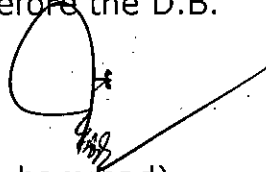

(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)

04.07.2022

Learned counsel for the appellant present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 11.10.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

11th Oct., 2022

Appellant present in person. Mr. Kabirullah Khattak, Addl. AG alongwith Abdul Jamil Khan, Litigation Officer for the respondents present.

Appellant seeks adjournment due to engagement of his learned counsel before Hon'ble Peshawar High Court. Adjourned. To come up for arguments on 10.11.2022 before the D.B.




(Fareeha Paul)
Member (E)

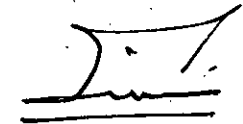
(Kalim Arshad Khan)
Chairman

02.09.2021

Appellant in person present. Mr. Sajid ADO (Litigation) alongwith Mr. Usman Ghani, District Attorney for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august High Court. Adjourned. To come up for arguments before D.B on 09.12.2021.



(ATIQU UR REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

09.12.2021

Counsel for the appellant and Mr. Asif Masood, DDA alongwith Sajid, ADEO (Litigation) for the respondents present.

Counsel for the appellant seeks time in order to prepare the brief. Request is accorded. To come up for arguments on 30.03.2022 before the D.B.


(Salah-ud-Din)
Member(J)


Chairman

30-3-2022

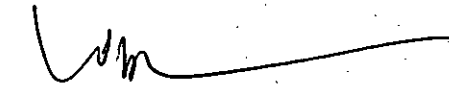
Proper DB not available the case is adjourned to come up for the same as before on 4⁷ 2022

01.12.2020

Appellant in person present.

Riaz Paindakhel learned Assistant Advocate General r for respondents present.

Former requests for adjournment that his counsel is busy before Hon'ble Peshawar High Court Peshawar. Adjourned. To come up for arguments on 08.02.2021 before D.B.



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

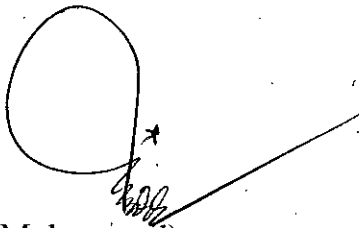


(Rozina Rehman)
Member (J)

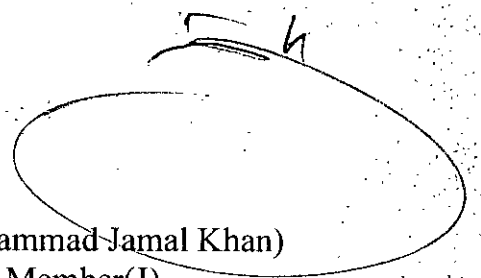
08.02.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Sajid, ADEO for respondents present.

According to the appellant he has made telephonic contact with his respective counsel but without any response; therefore, he requests for adjournment. The request is acceded to and the appeal is adjourned 04.05.2021 for arguments before D.B.



(Mian Muhammad)
Member (E)



(Muhammad Jamal Khan)
Member (J)

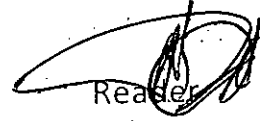
4.5.2021

due to COVID-19, the case is adjourned to 2-9-2021 for the hearing.



14-5.2020

Due to COVID19, the case is adjourned to
06/8/2020 for the same as before.


Reader

06.08.2020

Due to summer vacation case to come up for the same on
07.10.2020 before D.B.


Reader


07.10.2020

Appellant present through counsel.

Mr. Kabir Ullah Khattak learned Additional Advocate
General for respondents present.

Former requests for adjournment; granted. To come up
for arguments on 01.12.2020 before D.B.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

05-12-2019

Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 03.02.2020 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

03.02.2020

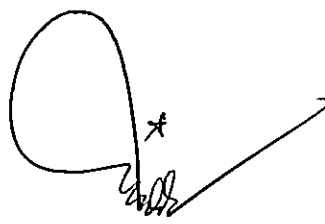
Appellant in person present. Addl: AG for respondents present. Appellant seeks adjournment. Adjourned. To come up for arguments on 16.03.2020 before D.B.


Member


Member

16.03.2020

Appellant in person present. Asst: AG alongwith Mr. Sajid, ADEO for respondents present. Due to general strike on the call of Peshawar Bar Council, the instant case is adjourned. To come up for arguments on 14.05.2020 before D.B.


(MAIN MUHAMMAD)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

17.07.2019


Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 17.09.2019 for arguments before D.B.


(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

17.09.2019

Appellant with and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 29.10.2019 before D.B.


Member


Member

29.10.2019

Appellant in person present. Addl: AG for respondents present. Appellant seeks adjournment due to general strike of the bar. Adjourned. Case to come up for arguments on 05.12.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

18.02.2019 Appellant with counsel present. Mr. Usman Ghani District Attorney for the respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file and seeks adjournment. Adjourned to come up for arguments on 02.04.2019 before D.B

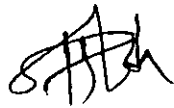


Member



Chairman

02.04.2019 Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondent present. Learned counsel for the appellant requests for adjournment as he could not prepare the brief due to over occupation. Adjourned to 21.05.2019 before D.B.



Member



Chairman

21.05.2019 Counsel for the appellant and Mr. Muhammad Jan, DDA for the respondents present.

Learned counsel for the appellant requests for adjournment as he could not prepare brief of instant matter due to over work.

Adjourned to 17.07.2019 before D.B.



Member



Chairman

26.09.2018

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Counsel for the appellant seeks adjournment. Granted. Case to come up for arguments on 02.11.2018 before D.B.



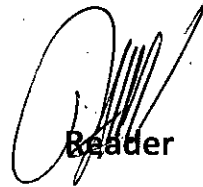
(Ahmad Hassan)
Member



(M. Amin-Khan Kundi)
Member

02.11.2018

Neither appellant nor his counsel present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Due to retirement of Hon'ble Chairman, the Tribunal is incomplete. Therefore, the case is adjourned. To come up for the same on 24.12.2018.



Reader

24.12.2018

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General alongwith Mr. Sajid Khan ADO for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come for arguments on 18.02.2019 before D.B.



Member

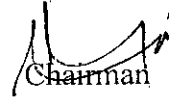


Member

09.02.2018


Counsel for the appellant and Addl. AG for the respondents present. Counsel for the appellant seeks adjournment. To come up for arguments on 10.04.2018 before the D.B.


Member


Chairman

10.04.2018

Counsel for the appellant and Addl. AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 22.06.2018 before D.B.


(Ahmad Hassan)
Member


(M. Hamid Mughal)
Member

22.06.2018

Counsel for the appellant present. Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents also present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 02.08.2018 before D.B.



(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

02.08.2018

Junior to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Junior to counsel for the appellant seeks adjournment as senior counsel is not in attendance. Adjourned. To come up for arguments on 26.09.2018 before D.B.


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member


06.07.2017

Counsel for the appellant and Addl: AG alongwith Mr. Javed Shah, DEO(M), Mardan for respondents present. Written reply submitted. To come up for rejoinder and final arguments on 30.08.2017 before D.B.


(Ahmad Hassan)
Member

0-----07 30.08.2017


Clerk of the counsel for appellant present. Mr. Zia Ullah, Deputy District Attorney alongwith Mr. Javed Shah, Litigation Officer for the respondents present. Clerk of the counsel for appellant seeks adjournment on the ground that learned counsel for appellant was busy before Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 6/12/17 before D.B.



(Muhammad Hamid Mughal)
Member (J)


(Gul Zeb Khan)
Member (E)

06.12.2017

Clerk to counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for respondent also present. Clerk to counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 09.02.2018 before the D.B.



(Ahmad Hassan)
Member (E)


(Muhammad Amin Khan Kundi)
Member (J)

19.04.2017

Counsel for the appellant present. Preliminary arguments heard and case file perused. The appellant was appointed as PST on 27.03.2012 and was involved impersonation case in the NTS test of 2015-16. A fact finding enquiry was conducted on the basis of which direct show cause notice was served upon the appellant without dispensing with the enquiry proceedings. The appellant was removed from service on 01.11.2016 against which he preferred departmental appeal on 24.11.2016 which was not responded within statutory period, hence the present service appeal on 14.03.2017.


Points urged need consideration. Admit subject to limitation. Appellant is directed to deposit security and process fee within 10 days, there-after notices be issued to the respondents for written reply/comments for 18.05.2017 before S.B.


(AHMAD HASSAN)
Member

18.05.2017

Counsel for the appellant and Mr. Javed Shah, Litigation Officer alongwith Addl. AG for the respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 06.07.2017 before S.B.





(Ahmad Hassan)
Member

Appellant
Security
Deposited
Process Fee


Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 275/2017

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	24/03/2017	<p>The appeal of Mr. Rashid Khan resubmitted today by Mr. Muhammad Asif Yousafzai Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	28-03-2017	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>4-04-2017</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	04.04.2017	<p>Counsel for the appellant seeks adjournment. Adjourned for preliminary hearing to 19.04.2017 before S.B.</p> <p style="text-align: right;"> Chairman</p>

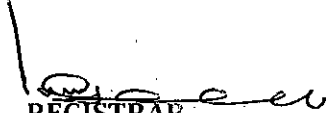
SCANNED
KPST
Peshawar

The appeal of Mr. Rashid Khan Ex-PST Sharif Malak Killi Takhat Bhai Mardan received today i.e on 14.03.2017 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Memorandum of appeal may be got signed by the appellant.

No. 494 /S.T,

Dt. 14/3 /2017


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Asif Yousafzai Adv. Pesh.

Respected Sir

Removed



BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 275 /2017

Rashid Khan

V/S

Education Deptt:

.....
I N D E X

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	1-3
2.	Copy of appointment order	- A -	4-7
3.	Copy of inquiry report	- B -	8
4.	Copy of show cause notice	- C -	9
5.	Copy of reply to show cause notice	- D -	10-11
6.	Copy of order dt: 1.11.2016	- E -	12
7.	Copy of departmental appeal	- F -	13-16
8.	Wakalat nama	----	17

APPELLANT

THROUGH:

M. Masif Yousafzai
(M.ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,

Taimur Ali Khan
(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,

& *S. Noman Ali Bukhari*
S. NOMAN ALI BUKHARI
ADVOCATE PESHAWAR.

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2017

Rashid Khan, Ex-PST,
Sharif Malak Killi Takhat Bhai, Mardan.

APPELLANT

VERSUS

1. The Secretary Education (E&SE) Peshawar.
2. The Director Education (E&SE) Peshawar.
3. The District Education Officer (Male) (E&SE), Mardan.

RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 01.11.2016 WHEREBY THE APPELLANT WAS REMOVED FROM SERVICE AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

.....
PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 01.11.2016 MAY BE SET ASIDE AND THE RESPONDENTS MAY BE DIRECTED TO REINSTATE THE APPELLANT WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS TRIBUNAL DEEMS FIT AND APPROPRIATE, MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTED SHEWETH:

FACTS:

1. That the appellant was appointed on the post of PST vide order dated 27.3.2012 and performed his duty up to the entire satisfaction of his superior and no complaint has been filed against him. (Copy of appointment order is attached as Annexure-A)
2. That in the impersonation case in the NTS test 2015-16, inquiry was conducted against some of the candidates who applied for the PST post in which the appellant was also called to attend the DEO office and told him that you are impersonator, but the appellant denied the allegation and stated that it may be the error of the NTS/Education department and also gave written statement that he is not involved in the case and did not know the impersonator however department did not give the inquiry report and gave only one page of that report and the full inquiry report may be requisitioned from the department. (Copy of that one page report of full inquiry is attached as Annexure-B)
3. That show cause notice was issued to the appellant the appellant submitted detail reply to the show cause in which he denied all the allegations. Copy of show cause notice and reply to show cause are attached as annexure-C&D)
4. That on the basis of that allegation, the appellant was removed from service vide order dated 1.11.2016 against which the appellant filed departmental appeal on dated 24.11.2016 which was not responded in the statutory period of ninety days. (Copy of order date 1.11.2016 and departmental appeal are attached as annexure-E&F)
5. That now the appellant comes to this august Tribunal on the following grounds amongst others.

GROUND:

- A) That not taking action on the departmental appeal of the appellant and order dated 1.11.2016 are against the law, rules and material on record, therefore liable to be set aside.
- B) That the inquiry was conducted against the other officials, but the inquiry committee also called the appellant and alleged him for impersonation which was totally denied by the appellant and also stated that it may be the error of the NTS/Education department and also gave written statement that he is not involved in the case and did not know the impersonator, but despite that the appellant was held responsible and punished for the fault of others.

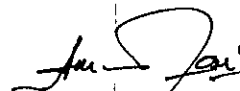
- C) That inquiry was not conducted according to the prescribed procedure as neither the appellant was properly associated with the inquiry proceeding nor given the opportunity of cross examination which not permissible under the rules.
- D) That no regular inquiry was held against the appellant even full inquiry report was not handed to the appellant which shows the malafide of the department.
- E) That no charge sheet was served to the appellant before the major punishment of removal from service which is mandatory under the rule.
- F) That the appellant denied the allegation of impersonation but despite major punishment of removal from service was imposed upon the appellant which means that the appellant was punished for the fault of others.
- G) That the punishment of removal from is harsh and passed in violation of law and rules.
- H) The appellant has been condemned unheard and was not treated according to law and rules.
- I) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.

APPELLANT

Rashid Khan

THROUGH:



(M.ASIF YOUSAFZAI)

ADVOCATE SUPREME COURT,



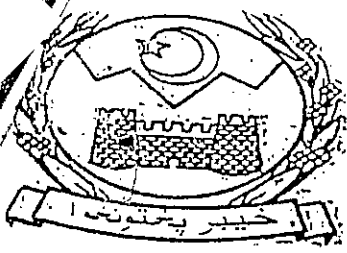
(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT,

& 

S. NOMAN ALI BUKHARI

ADVOCATE PESHAWAR.



Annexure "A" "A" (4)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER,
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT MARDAN**

Phone # 0937-9230151, email: emismardan@yahoo.com

OFFICE ORDER

Consequent upon the Advertisement published in the Daily Aaj Dated 30-05-2011 and Daily Mashriq dated 31-05-2011 and Test/Interview held on 03/07/2011 & 20-07-2011 respectively and approval given by the Departmental Selection Committee District Mardan in its meeting held on 13-03-2012 the undersigned being competent authority is pleased to appoint the following PST-Male Candidates (BPS-07/Rs.5800-320-15400)+ usual allowances as admissible to them under the rules against the vacant posts at the schools noted against each w.e.f the date of their taking over charge in the interest of public service subject to the following terms and conditions.

2% Disable Quota Candidates

S.#	NAME OF CANDIDATE	FATEHR NAME	UNION COUNCIL	HOME ADDRESS	SCORE	School Where Appointed
1	SHAKIR ULLAH	SHER AFZAL	MIAN ESSA	Lund Khwar	56.9	GPS Ghazi Baba
2	HAZARAT HUSSAIN	SARDAR HUSSAIN	MAHO DHERI	Maho Narai	52.52	GPS Maho Narai
3	NIJAZ ALI	AMIR ALI	KOHI BARMOL	Kohi Bermol	52.22	GPS Doshi
4	SHER RAHMAN	SHAMS UR RAHMAN	DAMAN-E-KOH	Takht Bhal	51.77	GPS Zarshad Bacha Korona

100% UNION COUNCIL WISE PST MALE

S.#	NAME OF CANDIDATE	FATEHR NAME	UNION COUNCIL	HOME ADDRESS	SCORE	School Where Appointed
1	SAJID ALI KHAN	IHSAN ULLAH KHAN	ALO	Alo Mardan	53.22	GPS Baghi Khail
2	ATTA UR RAHMAN	ISA KHAN	ALO	Alo Mardan	51.84	GPS No. 1 Pipal
3	MOHD GAUHAH RAHMAN	ABDUR RAHMAN	ALO	Pipal	50.37	GPS No. 2 Pipal
4	MUDASSIR AHMAD	REDDAD KHAN	BABENI	Babeni	58.86	GPS Haji Muhammad Killi
5	MUHAMMAD IRSHAD	AMIR NAWAZ	BABENI	Babeni	57.21	GPS Ajab Gul Killi
6	MURAD KHAN	FAQIR MUHAMMAD	BABENI	Shankar	54.8	GPS Mir Akbar Killi
7	KHAN WALI	FAZAL AHMAD	BABENI	Yahya Jadeed	54.64	GPS.Mir Akbar Killi
8	JAMIL AHMAD	MUHAMMAD KAMAL	BABENI	Sheikh Killi	54.24	GPS Ghani Sheikh Killi
9	HAKIM SAID	BACHA KHAN	BABENI	Shagai	53.47	GPS Ghani Sheikh Killi
10	MAZHAR ALI	MUHAMMAD IBRAHIM	BABENI	Sekandari	52.92	GPS Shankar
11	AMAN ULLAH	JAN BADSHAH	BAGH E IRAM	Majeed Abad St#9	50.22	GPS Tambulak
12	SHAHID AKBAR	MIR AKBAR SHAH	BAGHDADA	Miangon koz kanday Bagh	54.76	GPS Baghdada No. 1
13	RAEES KHAN	MUHAMMAD GHAWAS KHAN	BAGHDADA	Mainz Kanday Baghda:	51.82	GPS Baghdada No. 1
14	RAHMAN SHAH	FAZAL SHAH	BUGHDADA	Sobedaran Baghdada	51.72	GPS Faqir Band
15	MUHAMMAD ALI	GUL RAHMAN	BAGHICHA DHERI	Sheikh Abad SBG	60.17	GPS But Seri No. 1
16	ZAHOR AHMAD	SHAMS UR RAHMAN	BAGHICHA DHERI	Baghicha Dheri	56.07	GPS Gulshan Abad
17	AMAN KHAN	GHAFOOR KHAN	BAGICHA DHERI	Baghicha Dheri	51.31	GPS But Seri No. 1
18	AYAZ ALI	SAID RAHMAN	BALA GARHI	Cham Dheri	56.86	GPS Cham Dheri
19	ZUBAIR AHMAD	JAMSHED	BALA GARHI	Bala Garhi	49.15	GPS Koz Jomat
20	BAKHTAWAR SHAH	ZAR JAMIL	BAZAR	Aman Kot Rust	60.81	GPS Aman Kot
21	MUHAMMAD SHAKIL	GUL DAD	BAZAR	Gul Bahar Rust	54.18	GPS Shaheedan
22	SYED ARIF HUSSAIN	SHERIN BACHA	BAZAR	Bazar Rust	54.05	GPS Pir sal
23	IJAZ AHMAD	AZIM SHAH	BAZAR	Shaheedan Rst	54.03	GPS Pathao Malandri
24	SAJID KHAN	KHUSHID NOOR	BAZAR	Moh: Kalam Abad Bazar	52.65	GPS Sajawal Banda
25	SYED NASEER MUHAMMD	IQBAL HUSSAIN	BAZAR	Zarin Abad	51.63	GPS Suni Malandri
26	DIL SHER	GUL SHER	BAZAR	Ishaq Zai Bazar	48.89	GPS Pathao Malandri
27	IFTIKHAR ALI	INZAR GUL	BAZAR	Haroon Abad Rst	48.82	GPS Sar Bala

(Khalid C.O) 03459533411

ATTESTED

(S)

ALAMGIR KHAN	SHER MALIK	BAZAR	Bazar Rust	48.69	GPS Sar Bata
JEHAN ZEB	JEHAN ZEB	BAZAR	Sra Qabroona	48.54	GPS Berooch
HABIB UR RAHMAN	WALI RASOOL	BAZAR	Landi Rustam	47.53	GPS Berooch
SOHAIL AHMAD	MUKAMMIL KHAN	CHAMTAR	Miangul Zara	63.7	GPS Shari Abad
MUHAMMAD NAWAZ	MUHAMMAD SHERIN	CHAMTAR	Miangul Zara	53.89	GPS Chamtar
33 DARWISH ALI	MUHAMMAD ROSHAN	CHAMTAR	Miangul Zara	53.31	GPS Shari Abad
34 ABDOUL KHALIQ	GHULAM KHAN	CHAMTAR	Baja Killi	49.99	GPS Shah Killi
35 MUHAMMAD IFTIKHAR	ADAM KHAN	CHAMTAR	Akbar Abad	45.65	GPS Chamtar
36 SAJEEED GUL	NIAMAT GUL	CHAMTAR	Akbar Abad	44.4	GPS Mian Gul Killi
37 JEHAN ZEB	HASHAM KHAN	CHAMTAR	Seray Miangulzara	43.89	GPS Mian Gul Killi
38 ZIA ULLAH	NISAR MAHMOOD	CHARGULLI	Chargulli	52.87	GPS Chargulli
39 SHERAZ ALI	WARIS GUL	CHARGULLI	Ghanb Abad	49.99	GPS Pishkand
40 FOJDAR ALI	BUKHT SHAD	CHARGULLI	Surkh Dheri	49.57	GPS Chargul
41 ABID SHAH	RAHEEM SHAH	CHAK HOTI	Taus Banda	52.67	GPS Bako Dheri
42 SUBHAN ULLAH	MUHAMMAD JABEEN	CHAK HOTI	Jhazono Ground	48.76	GPS Bako Dheri
43 FAZAL SHAH	UMAR KHAN	DAGAI	Serai Koroono	59.03	GPS Faram Koroono
44 AOIB SAYYED	MAQBOOL SAYYED	DAGAI	Dagai	51.1	GPS Kochi Abad
45 ZAIRULLAH KHAN	RAHIM ULLAH	DHERI LIKPANI	Dheri Likpani	56.18	GPS Charchoor
46 WASEE UR RAHMAN	ABDUL GHANI	DHERI LIKPANI	Charchoor	55.88	GPS Ghalla
47 AMIN UL HAO	SHER ZAMIN	FATHMA	Fathma	58.75	GPS Fathma
48 GHALIB SHAH	MUHAMMAD DAUD SHAH	FATHMA	Gaddar	58.07	GPS Gaddar No. 1
49 ALI SHAH	SHER GHANI	FATHMA	Gaddar	52.88	GPS Palosai
50 MUHAMMAD ILYAS	ADIL MUHAMMAD	FATHMA	Hamza Khan	52.71	GPS Baba Abad
51 MUHAMMAD DAWOOD SHAH	MUSANNIF SHAH	FATHMA	Gaddar	52.64	GPS Jamra
52 AZIZ UR RAHMAN	REDI GUL	FATHMA	Aziz Abad	51.43	GPS Fathma
53 MUTWAHIR SHAH	MUSANNIF SHAH	FATHMA	Gaddar	51.33	GPS Gaddar No. 1
54 MUHAMMAD GHALIB	NAWAB GUL	FATHMA	Jamra	51.11	GPS Essa Khan Killi
55 FALAK NAZ	GHULAM MUHAMMAD	G.I.ZAI	G.I.Zai	57.41	GPS Charmang No. 2
56 MUHAMMAD NADEEM	MIRZA GUL	GARYALA	Hussai	52.93	GPS Assara Dheri
57 ABDOUL JALIL	GHULAM SAID	GARYALA	Garyala	52.82	GPS Bhai Khan
58 AKBAR KHAN	HUKAM KHAN	GHALLA DHER	Saeed Abad	64.17	GPS Saeed Abad No. 2
59 MUHAMMAD WAQAR	ASLAT KHAN	GHALLA DHER	Haji Umara Killi	52.76	GPS Sokai
60 MUHAMMAD SAEED	AKBAR ALI	GHALLA DHER	Sohbal Abad	49.8	GPS Saeed Abad No. 2
61 KHALEEQ UZ ZAMAN	SHAHI ZAMAN	GUJRAT	Gujrat	57.76	GPS Qamar Gal
62 TAHIR IOBAL	NOOR UD DIN	GUJAR GARHI	Gujar Garhi	57.42	GPS Afsar Abad
63 MUHAMMAD NASIR	FAIZ UR RAHMAN	GUMBAT	Boki Khel	53.55	GPS Dakki
64 MUHAMMAD YASAR	FAIZ UR RAHMAN	GUMBAT	Boki Khel	47.75	GPS Kodlnaka
65 MUHAMMAD ADEEL	SAMI UR RAHMAN	GUMBAT	Gombat	47.02	GPS Jayid Abad
66 NOOR UL BASAR	SARDAR WALI SHAH	GUMBAT	Gombat	46.48	GPS Mehmood Abad
67 MOHSIN ALI	FAZLI RAHMANI	GUMBAT	Gombat	45.89	GPS Chembar
68 NAIK MUHAMMAD	NISAR MUHAMMAD	GUMBAT	Mehmood Abad	45.1	GPS Javid Abad
69 MUKHTAMIM SHAH	GUL AKBAR SHAH	JAMAL GARHI	Jamal Garhi	52.08	GPS Jamal Garhi
70 MUHAMMAD TAIMUR SHAH	MEHBAB SHAH	JAMAL GARHI	Jamal Garhi	50.91	GPS Jamal Garhi
71 MUHAMMAD SHAH	KHAN BAHADAR	JAMAL GARHI	Jamal Garhi	42.04	GPS Jamal Garhi
72 ABDUL AZIZ	KHAN ZADA	JAMAL GARHI	Jamal Garhi	40.33	GPS Jangrez Killi
73 RASHEED KHAN	MISAL KHAN	JALALA	Khanjaryan	57.62	GPS Khanjaryan
74 MUHAMMAD FAROOQ	AAMIR KHAN	JEHANGIR ABAD	Jehangir Abad	63.25	GPS Qamar Gal
75 ZAHIR SHAH	NAOEEB SHAH	JEHANGIR ABAD	Jhandai Kalpani	59.8	GPS Qamar Gal
76 MAJID KHAN	SHARIF KHAN	K.D.ZAI	K.D Zai	60.23	GPS K.D Zai No. 1
77 JAVID	RAHIM KHAN	KANDAR	Niaz Din Killi	53.5	GPS Baghbanan
78 ALAMGIR KHAN	AKRAM KHAN	KANDAR	Shafi Abad	51.83	GPS Ganjyano
79 NOOR ULLAH KHAN	NAZEER ULLAH	KANDAR	Qasim	51.11	GPS Bahadar Khan

ATTESTED

(Khalid C.O) 0345953341

6

	MAR AFZAL KHAN	NAZIR GUL	SAWAL DHER	Sawal Dher	50.11	GPS Zerkhilab Banda
185	YASIR ALI SHAH	MUKAMMIL SHAH	SAWAL DHER	Zahir Abad Sawal Dher	49.97	GPS Ajab Din Killi
186	AURANG ZEB	AZIM SHAH	SAWAL DHER	Sawal Dher	48.59	GPS Sreekh
187	SHAKIR ALI	ZAHIR GUL	SAWAL DHER	PESCO Colony Mardan	48.02	GPS Musa Khal
188	AKRAM KHAN	SAID AMEEN	SAWAL DHER	Sawal Dher	47.83	GPS Blianday Katiang
189	SYED MUHAMMAD AMIR	SYED WAJID ALI SHAH	SERI BEHLOL	Arabi Banda	59.86	GPS Gujrano(Shafiq Abad)
190	SYED UMAIR ALI SHAH	SYED WAJID ALI SHAH	SERI BEHLOL	Arabi Banda	54.75	GPS Miangano Pir Abad
191	WARIS KHAN	SHER AFZAL	SERI BEHLOL	Umar Khan Banda	54.66	GPS Miangano Pir Abad
192	MUHAMMAD KARIM KHAN	KHAN ZADA	SERI BEHLOL	Umar Khan Banda	54.29	GPS Halki Kandary
193	JAAN ALAM KHAN	MALAK AMAN	SERI BEHLOL	Pir Abad	53.45	GPS Dako Baba
194	MURAD ALI	TAJ MUHAMAMD KHAN	SERI BEHLOL	Anwar Khan Killi	53.42	GPS No. 1 Afzal Abad
195	MUHAMMAD IJAZ	ASHRAF KHAN	SERI BEHLOL	Sari Behlol	53.39	GPS Misri Banda Pir Abad
196	MUHAMMAD SHAHID KHAN	CHEN BADSHAH	SERI BEHLOL	Pir Abad	53.3	GPS Misri Banda Pir Abad
197	GUL MUHAMMAD KHAN	DILAWAR KHAN	SARI BEHLOL	Umar Khan Killi	50.63	GPS Zarshad Bacha Korona
198	YOUSAF HAMEED	HAMEED ULLAH	SHAHBAZ GARHI	Muhammad Abad	56.8	GPS Guar Narshak
199	ATTA ULLAH	MUHAMMAD SHED	SHAHBAZ GARHI	Shahbaz Garhi	56.54	GPS Shahbaz Garhi No. 1
200	SABIR ALI	MUHAMMAD YOUNAS	SHAHBAZ GARHI	Shahbaz Garhi	55.53	GPS Guar Narshak
201	SUFAID AKHTAR	MUHAMMAD AZAM KHAN	SHAMOZAI	Koli Shah	57.2	GPS Chapal Abad
202	IMAD UD DIN	HAMEED KHAN	TORU	Shamshad Abad	59.36	GPS Kass Killi

TERMS AND CONDITION:

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. He will however be entitled to contributory Provident Fund in such a manner and at such rates as per prescribed by the Govt:
2. In case, he is already in Government Service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Executive District Officer (E & SE) Mardan through proper channel and selection by the department, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to him under his previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to him under new appointment.
3. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
4. He should join his post within 15 days of the issuance of this Notification. In case of failure to join their post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
5. He will be on probation for a period one year extendable for another one year.
6. He will be governed by such rules and regulations as may be issued from time to time by the Govt:
7. His services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned.
9. The DDO Male Mardan/Takht Bhai ADOs Circle Head Teacher would furnish a certificate to the effect that the candidate has joined the post or otherwise after 15 days of the issue of his posting order.
10. The DDO Male Mardan/Takht Bhai will verify their original Certificates/Degrees/DMC and domicile before release of pay.
11. They are required to provide health/Medical Certificate from the concerned Medical Superintendent before taking over charge.

ATTESTED

(Khalid C.O) 03459533411

1

13. The Deputy District Officer Mardan and T.Bhai, ADOs Circles, and Head Teacher may not hand over charge to the appointees if there is no vacant post in the school.

14. The Drawing and Disbursing Officers should submit a certificate for release of pay as under Name _____ S/O _____ appointed against PST post at GPS _____ vide order No. _____ at S. No. _____ total Score _____ Certificates/Degrees/DMCs and domicile certificate of District Mardan have been personally verified and found correct however, if any discrepancy detected later on will be the whole responsibility of the undersigned


Signature _____ Name _____ DDO Male GPS: _____

(BAHADAR KHAN MARWAT)
EXECUTIVE DISTRICT OFFICER
E & S EDUCATION MARDAN

Order No. 3805/9 Dated Mardan the 27/3/2012

Copy forwarded for information and necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Coordination Officer Mardan.
3. District Comptroller of Accounts Mardan.
4. District Officer (Male) E & SE Local Office.
5. DDOs (Male) Takht Bhai & Mardan.
6. The Candidates concerned.


EXECUTIVE DISTRICT OFFICER
E & S EDUCATION MARDAN
26/3/12

ATTESTED

⑧ Annexure B ⑧

452501174

1: Mr Iftikhar Ali S/O Mr Shaukat Ali Khan Roll No 452201154 CNIC No 16102-3242527-5 U/C Pir Saddi had applied for the post of PST through NTS and had taken the test in the month of November 2015 and has been appointed as PST at GPS Pir Saddi No 1 Takht Bhai. His photograph had not been received from NTS at the time of his interview. So we requested to NTS to provide his video and after some days we found his video sent by the NTS Organization. He gave us written statement that he had taken the test himself but when we compared it with his real photo and through other reliable sources we came to know that he had not taken the test himself. At the time of submission his NTS form he had fixed a photo of another person named Rasheed Khan S/O Misal Khan village Pir Saddi on his own CNIC and had drawn Photostat. For authenticity we received photo copy of the CNIC of Mr Rasheed Khan which has been expired on 30/06/2015. The picture of both in the CNIC and the picture fixed on the NTS form of Iftikhar Ali are the same. In 2015 Mr Rasheed has renewed his CNIC on which the picture is of the impersonator who has taken the test for Mr Iftikhar Ali. It means that The picture taken during the test is of Mr Rasheed Khan S/O Misal Khan CNIC No 16102-0541588-9 who is serving in education department against PST post at GPS Sharif Malak Killi.

We got the mobile number of Rasheed Khan with the help of community members and called him to join us in the Office of DEO Male Mardan on 28/07/2016 along with original CNIC. He attended DEO office but had no CNIC and offered his original service card on which the same picture was fixed which had been fixed on the photo copy of Mr Iftikhar CNIC sent to NTS for test. We asked Mr Rasheed about the same pictures which he declared as the error of the NTS/Education department. We asked him to give us the photo copy of his service card but he did not honour. He also gave his written statement that he is not involved in this case and did not know the impersonator. However through our strenuous efforts it is clear that the impostor is Mr Rasheed Khan S/O Misal Khan village Khnjaryan pir saddi.

2: MR Mirajul Haq S/O Shah Nazar Khan U/C Pir Saddi Roll No 452201314 CNIC No 16102-9939053-1 is supposed to have taken the test on 29 th November 2015 at Ansi Degree College Mardan center and has been appointed against PST post at GPS Gul MIR KILLI Circle Sher Ghar. According to his verbal statement he had filled his admission form himself. When we compared his picture with the photo provided by NTS both were quite different from each other and after a deep investigation we found out that the impersonator was the same person Mr Rasheed Khan S/O Misal Khan village Pir Saddi who was also the impersonator in the case of Mr Iftikhar Ali. It means that Mr Rasheed Khan is a professional impersonator and has taken the test for both the candidates on different days.

3. The remaining eight candidates i.e Mr Shakirullah S/O Anayat Khan PST GPS Pir Saddi No 2, Saeed Muhammad S/O Pir Muhammad PST GPS Mishkar, Mushtaq Ahmad S/O Sher Bahadar PST GPS Latif Abad Sherghar, Zakirullah S/O Alam Zeb PST GPS Qadar Shah Killi,

ATTESTED

Annexive

C

9

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN

No. 5712

Dated Mardan the 06/08/2016

SHOW CAUSE NOTICE

I, Siraj Muhammad, District Education Officer (Male) Mardan as a competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule, 2011 do hereby serve you, Mr. Rashid Khan S/O Misal Khan Working against PST Male post at GPS Sharif Malik Killi U.C Pir Saddi District Mardan

1. That the consequent upon the complaints received by the undersigned regarding your alleged impersonation for the appointment against PST Male post in the E&SE Department District Mardan in place of Mr. Iftikhar Ali S/o Mr. Shaukat Ali Khan during the NTS held on 28/11/2015 for U/C Pir Saddi District Mardan
2. That an inquiry committee was constituted to conduct inquiry in the case, after conducting inquiry by the inquiry committee they proved your impersonation and recommended you for major penalty i.e. Removal from Service
3. That you being Civil Servant have committed Inefficiency and Misconduct by bringing ill name for the department by impersonating during the said examination, Hence liable to be proceed against under the E&D Rules, 2011.
4. You are, therefore, required to show cause as to why the Major Penalty of Removal from Service should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this notice is received within fourteen (14) 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.

D No - 4020
Dt: 17-8-16

Siraj Muhammad
District Education Officer
(Male) Mardan

Endst No: 5713

Dated: 06-08-2016.

Copy forwarded to:-

1. SDEO (M) Takht Bhal.
2. Mr, Rashid Khan S/O Misal Khan PST GPS Sharif Malik Killi.
3. Head Teacher GPS Sharif Malik Killi.
4. P/File Rashid Khan.

Received from
Dy. Secy SDEO office (M)
Takht Bhal Mardan dated 24-8-2016

6/8/16
District Education Officer
(Male) Mardan

ATTESTED

TO,

Amesore

"D"

(10)

The District Education
Officer (Male) E&S
Education Mardan.

Subject: REPLY OF SHOW CAUSE NOTICE.

Sir,

Kindly refer to your office letter No.5712 Dated. 6/8/16 on the subjected sited above, in this connection it is humbly stated that undersigned was not served in accordance with rulers nor he was provided any documents etc which is violation of the rules on the subject. The under sign came to know about the show cause notice through daily AAj published on 20/8/2016 hence the reply of the under sign is within time as the limitation period start when the person first come to know about legal proceedings.

The reply regarding allegation/ charges are as under.

1. That charge No.1 is baseless without grounds and evidence. The undersigned has not committed any offence or crime of impersonation, hence the same is denied.
2. That charge No,2 also denied neither i was intimated about the constitution of the inquiry committee nor I was provided the opportunity to participate in the inquiry proceedings which is against the natural justice fair play, equity, due process of law as protected under article 10A of the constitution of Pakistan 1973.
3. That charge no.3 also denied as the undersign has not committed any offence of impersonation hence the question of inefficiency and misconduct is out of question,

ATTACHED


34
A1-21

4. That keeping in view the above, it is stated the aforementioned allegations/charges are false frivolous, malicious and without any cause of action, documentary evidence, hence liable to be set-aside in order to meet the ends of justice , principle of natural justice, principle protected U/A article 4,5,8,10A 25&27. The under sign also intend to be heard in person and entitle under the law to be given opportunity of defence and representation. .
5. That the reply of the under sign is with in due time as the limitation period starts from date when the applicant first come to know about any legal proceeding.

It is therefore humbly requested that the reply of the under sign may kindly be accepted and the unwarranted/ illegal proceedings may kindly be stopped/set-aside and may kindly be treated accordance with law.

Date. 27-08-2016

Yours sincerely


Rashid khan S/o Misal khan

GPS Sharif malik kali U/c

Pir sadai District Mardan.

Cell # 0345-9373737

ATTESTED

14/11/16
Annouce "E" (19)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.
REMOVAL FROM SERVICE.

Whereas Mr, Rashid Khan PST GPS Sharif Malak Killi Takht Bhai was invalid in impersonation case in the recruitment of NTS held on 28-11-2015.

And whereas in inquiry committee was constituted to conduct inquiry and find out the fact.

And whereas the inquiry committee has conducted inquiry in proved the charges leveled against you.

And whereas a show cause notice was served upon you, and given chance of hearing on 26-10-2016. But your response was not convincing in defense.

Now the unsigned being competent authority is pleased to remove Mr, Rashid Khan SPT GPS Sharif Malak Killi from Govt service with immediate effect in the light of rules (4) b-III of E&D rules 2011.

(ZIA UD DIN)
DISTRICT EDUCATIO OFFICER
(MALE) MARDAN

Endst: No 8539-6

Dated 11-11 /2016.

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director NTS Islamabad.
3. Deputy Commissioner Mardan.
4. DPO Mardan with request the register FIR against the above official as already requested vide this office No.6602 Dated 31-08-2016.
5. SDEO (M) Takht Bhai.
6. District Accounts Mardan.
7. Head Teacher GPS Sharif Malik Killi Takht Bhai.
8. Mr, Rashid Khan PST GPS Sharif Malak Killi Takht Bhai (Through Registry).
9. EMIS Branch Local office Mardan.

11/11/16
DISTRICT EDUCATIO OFFICER
(MALE) MARDAN

ATTEST

The Director General of Prisons
Khyber Pakhtunkhwa

Prisoner

Subject: Rehabilitation against the order of

D.3.O(M) Marwan Vibe No. 8237-2 dated

11-11-2016 through which the applicant

was removed from service is incorrect

because, order is not against law & facts and

in-effective upon the rights of the

applicant, & the impugned order is liable

to be set aside.

Respectfully,
Prisoner

That the applicant namely Marwan Vibe was

a P.S.T of G.P.S. Staff Marwan Vibe

District Marwan

that the entire service record of the

applicant is correct and complete and the

applicant performed to the entire satisfaction

of his superiors.

That the D.3.O(M) Marwan Vibe removed the applicant

4 (contd P-2)

from service vide order No = 8539-G, without any legal justification and liable to be set aside on the following grounds amongst others:- Copy of Impuned order is attached as Annex A.

- a) That the charges levelled against the Appellant are totally baseless and against facts.
- b) That the charges levelled against pertains to question of facts which need pro & contra evidence to be proved and to meet the ends of justice.
- c) That the D.E.O(m) Mardan has not treated the Appellant according to law.
- d) That the impunged order was issued without observing the entire codal formalities and passed in haphazard manner, hence liable to be set aside.
- e) That the punishment i.e Removal from Service is too much harsh and not sustainable in the eye of law and against the natural justice.
- f) That the D.E.O(m) Mardan simultaneously started the departmental proceedings and penal proceedings against the Appellant,

(Contd Pg-3)

ATTEST: T

which is evident from the impugned order, in which the D.P.O Mardan was requested for lodging FIR against the Appellant, which is against law.

- g) That the Appellant was not involved in any kind of impersonation and the entire allegations are baseless, & during the Proceedings, against the Appellants was not provided proper defence and an opportunity of cross-examination.
- h) That ~~the Appellant denied the~~ allegations before the D.E.O(m) Mardan and the subject-matter do not fall within the ambit of E&D rules 2011, hence the impugned order is liable to be set aside.
- i) That the Appellant is young, energetic and Educated person and the only earning hands of his family and the impugned order is the cause of the death of his service career and Prosperous future.
- j) That the impugned order is based on


ATTESTED

(contd pg-4)

malafide intention and of the official conspiracy to deprive the Appellant from his legal right.
k) That the D.S.O (m) Mardan used his office as a weapon against the Appellant being innocent and the charges are totally baseless, and meritless.

Therefore it is humbly prayed that by accepting the instant Appeal, the impugned order may kindly be set-aside and the Appellant may kindly be re-instated with all back-benefits.

Dated:- 24-11-2016


Rashid Khan
P.S.T GPS
Sharif Malik Kelly
Takhit Bhai
Mardan.
Cell = 0345-9373737.

ATTESTED

VAKALAT NAMA

NO. _____/20

IN THE COURT OF Service Tribunal Peshawar

Rashid Khan (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Deptt (Respondent)
(Defendant)

I/We _____

Do hereby appoint and constitute **M.Asif Yousafzai, Advocate, Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.


I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated 14-3 /2017


(CLIENT)

ACCEPTED


M. ASIF YOUSAFZAI
Advocate


TAIMUR ALI KHAN
Advocate

M. ASIF YOUSAFZAI
Advocate High Court,
Peshawar.

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building,
Khyber Bazar Peshawar.
Ph.091-2211391-
0333-9103240

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHA WAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

Versus

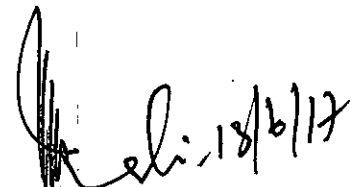
The Secretary Education (E & SE) Peshawar & Others

..... Respondents

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	04
2.	Copy of Order	A	05	--
3.	Copy of Complaints from ASDEO, Head Master and PTC Chairman.	"B", "BI", "BII"	06	08
7.	Copy of Inquiry Report,	"C"	09	14
8.	Copies of Application Forms of Iftikhar Ali, original CNIC, CCTV Photage	"D"	15	21
9.	Copies of Application Forms of Miraj Ul Haq, CCTV Photage	"E"	22	26
10.	Copy of Show Cause Notice	"F"	27	--
11.	Copy of Personal Hearing	"G"	28	--

Respondents No 1 to 3


District Education Officer
(Male) Mardan

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

Versus

The Secretary Education (E & SE) Peshawar & Others

..... Respondents

Para Wise Comments on Behalf of Respondents No 1 to 3

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action as well as locus standi to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to this Honourable Tribunal with clean hands.
6. That the appellant is estopped by his own conduct.
7. That the appellant has concealed the material facts from this Honourable Tribunal hence liable to be dismissed.
8. That the instant appeal is liable to be dismissed for non-joinder of necessary / mis-joinder of unnecessary parties.
9. That the instant appeal is based on malafide intention, hence liable to be dismissed.
10. That the instant appeal is against the prevailing law and rules.
11. That after fulfillment of all the codal formalities the appellant was removed from Service for the charges of impersonation in the NTS test vide order Endst No 8539-G dated 09-11-2016 in accordance with law. (Copy of Order is attached as **Annex- "A"**)

ON FACT:

1. Para No 1 is incorrect to the extent of his satisfactory duty, as the Appellant was previously removed from service by his ill behaviour toward his duty on continuous complaints made against the appellant from officers and PTC Chairman of the concerned School regarding non performing duty/absenteeism in the school in 2008, while the appellant again fraudulently kept the education department in dark regarding his previous service and joined the education department on 27-03-2012. (Copies of Complaints from ASDEO, Head Master and PTC Chairman are attached as **Annex- "B", "BI", "BII"**)

2. Para No 2 is correct to the extent of inquiry, as per the inquiry report it was proved that the appellant being professional impersonator, impersonated in NTS test in the name of Iftikhar Ali S/O Shaukat Ali Khan, Miraj ul Haq S/O Shah Nazar Khan has taken the test for both the candidates on different days, the NTS administration was asked to provide the application form and picture of the candidates which clearly shows that the appellant has affixed his own photo on the copy of CNIC and application form of Iftikhar Ali, while the CCTV photage also proves the presence of the appellant in the test. (Copies of Inquiry Report, Application Forms along with CCTV Photage are attached as **Annex-“C”, “D”, “E”**).
3. Para no 3 pertains to record, as the appellant was issued Show Cause notice on 06-08-2016, accordingly the appellant was also given a chance of personal hearing as per the law but he badly failed to defend himself which is clear from his statement made before the answering respondent. (Copy of Show Cause and Personal Hearing is attached as **Annex- “F”, “G”**)
4. Para No 4 pertains to record, as the answering respondent acted in accordance with the law and imposed the major penalty on the appellant for the charges of impersonation in NTS test vide Order Endst No 8539-G dated 09-11-2017, however no representation has been made to the answering respondent by the appellant.
5. The detail replies of the grounds are as under.

GROUND:

- A. Para A is incorrect, baseless, against fact & law, the answering respondent acted in accordance with the law, hence denied.
- B. Para B is incorrect, as thoroughly explained in the facts, as the inquiry report and the evidence received from the NTS administration also prove the impersonation on the part of the appellant, hence denied.
- C. Para C is incorrect, baseless, against facts, the appellant was given full opportunity at the time of inquiry, the appellant also appeared before the inquiry committee, likewise the appellant was given a chance of personal hearing but he badly failed to defend himself, hence denied.
- D. Para D is incorrect, as explained in the preceding para and in the facts, hence denied.
- E. Para E pertains to record, hence need no comments.
- F. Para F pertains to record, as the appellant was given a chance to explain his position but he badly failed which prove his involvement, hence no comments.
- G. Para G is incorrect, the answering respondent acted in accordance with the law, hence denied.
- H. Para H is incorrect, baseless against facts, as thoroughly explained in the preceding paras and in the facts, the appellant was given full opportunity in the entire proceeding but he badly failed, hence denied.

I. The respondent seek permission to raise additional grounds at the time of arguments.

It is therefore humbly prayed that in the light of above facts, the appeal may please be dismissed with cost.

Respondents No 1 to 3

15/6/17
Director E & SE
Peshawar

[Signature]
Secretary to Govt of
Khyber Pakhtunkhwa E & SE Department
Peshawar

15/6/17
District Education Officer
(Male) Mardan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

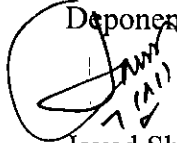
Versus

The Secretary Education (E & SE) Peshawar & Others

..... Respondents

AFFIDAVIT

I, Mr. Javed Shah Legal Advisor Education Department Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by Respondents No 1 to 3 are true to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Deponent

Javed Shah
16101-8562610-3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHA WAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

Versus

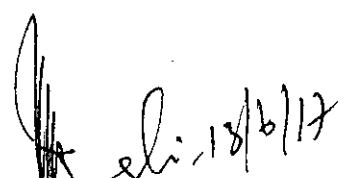
The Secretary Education (E & SE) Peshawar & Others

..... Respondents

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	04
2.	Copy of Order	A	05	--
3.	Copy of Complaints from ASDEO, Head Master and PTC Chairman.	"B", "BI", "BII"	06	08
7.	Copy of Inquiry Report,	"C"	09	14
8.	Copies of Application Forms of Iftikhar Ali, original CNIC, CCTV Photage	"D"	15	21
9.	Copies of Application Forms of Miraj Ul Haq, CCTV Photage	"E"	22	26
10.	Copy of Show Cause Notice	"F"	27	--
11.	Copy of Personal Hearing	"G"	28	--

Respondents No 1 to 3


District Education Officer
(Male) Mardan

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

Versus

The Secretary Education (E & SE) Peshawar & Others

..... Respondents

Para Wise Comments on Behalf of Respondents No 1 to 3

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action as well as locus standi to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to this Honourable Tribunal with clean hands.
6. That the appellant is estopped by his own conduct.
7. That the appellant has concealed the material facts from this Honourable Tribunal hence liable to be dismissed.
8. That the instant appeal is liable to be dismissed for non-joinder of necessary / mis-joinder of unnecessary parties.
9. That the instant appeal is based on malafide intention, hence liable to be dismissed.
10. That the instant appeal is against the prevailing law and rules.
11. That after fulfillment of all the codal formalities the appellant was removed from Service for the charges of impersonation in the NTS test vide order Endst No 8539-G dated 09-11-2016 in accordance with law. (Copy of Order is attached as **Annex- "A"**)

ON FACT:

1. Para No 1 is incorrect to the extent of his satisfactory duty, as the Appellant was previously removed from service by his ill behaviour toward his duty on continuous complaints made against the appellant from officers and PTC Chairman of the concerned School regarding non performing duty/absenteeism in the school in 2008, while the appellant again fraudulently kept the education department in dark regarding his previous service and joined the education department on 27-03-2012. (Copies of Complaints from ASDEO, Head Master and PTC Chairman are attached as **Annex- "B", "BI", "BII"**)

2. Para No 2 is correct to the extent of inquiry, as per the inquiry report it was proved that the appellant being professional impersonator, impersonated in NTS test in the name of Iftikhar Ali S/O Shaukat Ali Khan, Miraj ul Haq S/O Shah Nazar Khan has taken the test for both the candidates on different days, the NTS administration was asked to provide the application form and picture of the candidates which clearly shows that the appellant has affixed his own photo on the copy of CNIC and application form of Iftikhar Ali, while the CCTV photage also proves the presence of the appellant in the test. (Copies of Inquiry Report, Application Forms along with CCTV Photage are attached as **Annex-“C”, “D”, “E”**).
3. Para no 3 pertains to record, as the appellant was issued Show Cause notice on 06-08-2016, accordingly the appellant was also given a chance of personal hearing as per the law but he badly failed to defend himself which is clear from his statement made before the answering respondent. (Copy of Show Cause and Personal Hearing is attached as **Annex- “F”, “G”**)
4. Para No 4 pertains to record, as the answering respondent acted in accordance with the law and imposed the major penalty on the appellant for the charges of impersonation in NTS test vide Order Endst No 8539-G dated 09-11-2017, however no representation has been made to the answering respondent by the appellant.
5. The detail replies of the grounds are as under.

GROUND:

- A. Para A is incorrect, baseless, against fact & law, the answering respondent acted in accordance with the law, hence denied.
- B. Para B is incorrect, as thoroughly explained in the facts, as the inquiry report and the evidence received from the NTS administration also prove the impersonation on the part of the appellant, hence denied.
- C. Para C is incorrect, baseless, against facts, the appellant was given full opportunity at the time of inquiry, the appellant also appeared before the inquiry committee, likewise the appellant was given a chance of personal hearing but he badly failed to defend himself, hence denied.
- D. Para D is incorrect, as explained in the preceding para and in the facts, hence denied.
- E. Para E pertains to record, hence need no comments.
- F. Para F pertains to record, as the appellant was given a chance to explain his position but he badly failed which prove his involvement, hence no comments.
- G. Para G is incorrect, the answering respondent acted in accordance with the law, hence denied.
- H. Para H is incorrect, baseless against facts, as thoroughly explained in the preceding paras and in the facts, the appellant was given full opportunity in the entire proceeding but he badly failed, hence denied.

I. The respondent seek permission to raise additional grounds at the time of arguments.

It is therefore humbly prayed that in the light of above facts, the appeal may please be dismissed with cost.

Respondents No 1 to 3

15/6/17
Director E & SE
Peshawar

15/6/17
District Education Officer
(Male) Mardan

[Signature]
Secretary to Govt of
Khyber Pakhtunkhwa E & SE Department
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

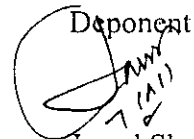
Versus

The Secretary Education (E & SE) Peshawar & Others

..... Respondents

AFFIDAVIT

I, Mr. Javed Shah Legal Advisor Education Department Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by Respondents No 1 to 3 are true to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Deponent


Javed Shah

16101-8562610-3

12/11/16
1A
L1

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.
REMOVAL FROM SERVICE.

Whereas Mr, Rashid Khan PST GPS Sharif Malak Killi Takht Bhai was invalid in impersonation case in the recruitment of NTS held on 28-11-2015.

And whereas in inquiry committee was constituted to conduct inquiry and find out the fact.

And whereas the inquiry committee has conducted inquiry in proved the charges leveled against you.

And whereas a show cause notice was served upon you. and given chance of hearing on 26-10-2016. But your response was not convincing in defense.

Now the unsigned being competent authority is pleased to remove Mr, Rashid Khan SPT GPS Sharif Malak Killi from Govt service with immediate effect in the light of rules (4) b-III of E&D rules 2011.

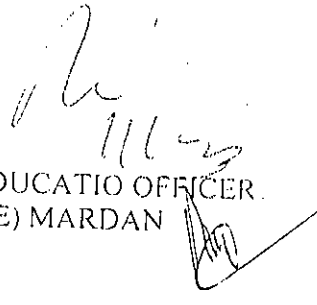
(ZIA UD DIN)
DISTRICT EDUCATIO OFFICER
(MALE) MARDAN

Endst: No 85-39-9

Dated 11/11 /2016.

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director NTS Islamabad.
3. Deputy Commissioner Mardan.
4. DPO Mardan with request the register FIR against the' above official as already requested vide this office No.6602 Dated 31-08-2016.
5. SDEO (M) Takht Bhai.
6. District Accounts Mardan.
7. Head Teacher GPS Sharif Malik Killi Takht Bhai.
8. Mr. Rashid Khan PST GPS Sharif Malak Killi Takht Bhai (Through Registry).
9. EMIS Branch Local office Mardan.


DISTRICT EDUCATIO OFFICER.
(MALE) MARDAN

5586

Sh. J. D. O. (M) P. G.
No 597 date 26-9-07

17

The Dy. D. O. (M) P. G.

T. Bhai

"B"

H/- visit report GPS Khanyaran.

Memo,

I visited the GPS Khanyaran along with you on 22-9-07 and you have directed to send report of GPS of the said school.

It is stated that Mr Badarull Hassan H/Teacher was present and was busy in teaching, while Mr Ali Gohar PST was on ^{marked} c/leave, Mr Rashid Khan PST was on leave with out application and permissions. Mr Injanullah chowkidar signed in the Attendance Register but physically absent but later on report to school. The H/Teacher complain verbally complained that the chowkidar not performing his duty. So report is submitted for your kind information.

Submitted

[Signature]

Assistant Dist Officer
Circle Sher Garh
T. Bhai Mardani

36

THE DY; DISTT; OFFICER
PRIMARY TAKHT BHAI.
No. 9490 / F.No/Rasheed Khan/PST
Dated Takht Bhai the 21/7 /2008.

To
The Executive District Officer
Elementry & Secy: Education
Mardan.

A B U

Subject:- APPLICATION OF THE CHAIRMAN PTC GPS KHANJARYAN AGAINST
Memo: RASHEED KHAN PST GPS KHANJARYAN.

Enclosed find herewith the self explanatory complaint of the Chairman of the PTC
GPS Khanjaryan against Rasheed Khan PST of the said school and consequent report of the A.D.O
Shergarh Circle against this teacher. This teacher is neither wanted nor fit in this Sub Division and
may be transferred to Mardan Sub-Division.

Encl: 02

Endst: No. 9491
Copy to the:
1. A.D.O Sher Garh w/r to his No,663 dt 17/7/2008.

M.D
o/c
DEPUTY DISTRICT OFFICER
(M) PRIMARY TAKHT BHAI.

M.D
o/c
DEPUTY DISTRICT OFFICER
(M) PRIMARY TAKHT BHAI.
M.D
o/c
The District Education
Officer Mardan

کھنڈ (3) A.D. 500 صاحب (پندرہویں) کھنڈ

صاحب عالی در خواست عمر و تکلیف

خود بنا کر اس میں صرف دخل ہے۔

میں نے ایک بار لکھی ہے اس درخواست کھنڈ یا کھنڈ میں اس پر لکھی

تک کہ کسی عمل درآمد نہیں ہوا۔ اسے دو آگے تار درخواست اس بار لکھی

ساتھ ہے کہ اس عمر (پندرہویں) کا ہونا اس کا

رہنما عام آدمی کو اسے عمر عارضیت سے اس وقت ہینہ میں در میں

کے عارضی نہیں کرتا۔ حکمت عارضیت سکون کا لفظ بالکل نیا ہے جو کہ ہے۔ ہم اس بار
لکھی ہے کہ بتائی گئی تھی کہ کوئی ایک دن اس میں ہوا ہے اس بار کھنڈ تکلیف

اگر اس بار اس درخواست پر کوئی ایک دن اس میں ہوا ہے تو ہونا
میں نے ہم جیو آگے سکون سے لکھی ہے اس کے ساتھ ساتھ اس بار اس میں ہوا ہے

کھنڈ (3) صاحب (پندرہویں) کھنڈ

عمر مصری



Office of ~~the~~
Circle Sher Garh

No. 663 date 17-7-08

34

To The Dy. DO, (M) Prg,

T. Bham PSC

Subj: Application of the Chairman GPS Khayariyan against Rasheed Khan
PST GPS Khayariyan

Memo,

I have the honor to submit here with the application of Akbar Ali Chairman ^{PSC} with the remarks that the application is based in fact and the said teacher is irregular in his duty and is a disobedient teacher.

1. He has been asked to provide Service Book to Circle Office vide Dy. DO T. Bham No 9622 dated 23-6-08 but failed to comply with

2. He has been asked repeatedly to deposit the pay of the absence period in Govt Treasury but failed to obey and used foul words against the high authority.

It is recommended that the said teacher may be transferred far away out of Tehsil T. Bham and be sent suspended for three months.

Dy. No. 9535
1877/08

J. Hassan
Assistant Distt Officer
Circle Sher Garh
Bhai Mardan

Accepted
[Signature]

رشته تخصصی مدیریت متعلقه گرایش مدیریت بازرگانی
 بابت ماه اسفند ۱۳۸۶

ردیف	نام و نام خانوادگی		شماره ثبت نام		شماره کتبی		شماره عملی		مجموعی
	نام	نام خانوادگی	کتابخانه	کتابخانه	کتابخانه	کتابخانه	کتابخانه	کتابخانه	
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

شماره ثبت نام	نام	نام خانوادگی	شماره کتبی	شماره عملی	مجموعی
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

تفصیل در برگه پیوسته

①

27

Office of the Principal

GHS Babuzai Katlang Mardan

Dated 04/08/2016 NO ---288

District Education Officer Male

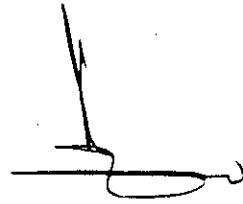
Elementary And Secondary Education

Mardan

subject; ENQUIRY REPORT AGAINST THE IMPERSONATION CASE OF MR IFTIKHAR ALI S/O MR SHAUKAT ALI KHAN KHAN ROLL NO 452501174, MR MIRAJUL HAQ S/O SHAH NAZRAR KHAN ROLL NO 452201314, MR SHAKIRULLAH S/O MR INAYAT KHAN ROLL NO 452401382. MR SAEED MUHAMMAD S/O PIR MUHAMMAD ROLL 452401019, MR MUSHTAQ AHMAD S/O SHER BAHADAR ROLL NO 452301194 ,MR ZAKIRULLAH S/O MR ALAM ZEB ROLL NO452200746, GOUHAR SHAH S/O MR NIAMAT KHAN ROLL NO 452201088, AMJAD AKHTAR S/O MR ALAM SHAH ROLL NO 451701238 , MR SADDAM HUSSAIN S/O MR SARTAJ KHAN ROLL NO 452101177 AND MR SAJJAD AHMAD S/O MR SHER BAHADAR ROLL NO 452101058 UC PIR SADDI IN THE NTS-TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

Respected Sir

please find the attached enquiry report



PRINCIPAL

GHS BABUZAI KATLANG

MARDAN

2

ENQUIRY REPORT AGAINST :- THE IMPERSONATION CASE OF MR IFTIKHAR ALI S/O MR SHAUKAT ALI KHAN KHAN ROLL NO 452501174, MR MIRAJUL HAQ S/O SHAH NAZRAR KHAN ROLL NO 452201314, MR SHAKIRULLAH S/O MR INAYAT KHAN ROLL NO 452401382. MR SAEED MUHAMMAD S/O PIR MUHAMMAD ROLL 452401019, MR MUSHTAQ AHMAD S/O SHER BAHADAR ROLL NO 452301194 ,MR ZAKIRULLAH S/O MR ALAM. ZEB ROLL NO452200746, GOUHAR SHAH S/O MR NIAMAT KHAN ROLL NO 452201088, AMJAD AKHTAR S/O MR ALAM SHAH ROLL NO 451701238 , MR SADDAM HUSSAIN S/O MR SARTAJ KHAN ROLL NO 452101177 AND MR SAJJAD AHMAD S/O MR SHER BAHADAR ROLL NO 452101058 UC PIR SADDI IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

Assigned by

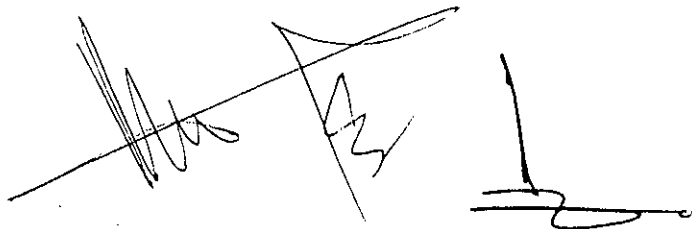
District Education Officer Male Elementary and Secondary
Mardan

Date of Submission

04/08/2016

Enquiry Officers

1. Mr Arshad Hussain Principal GHS Babuzai Katlang Mardan
2. Mr Abdul Khaliq ASDEO Sher Ghar Circle Mardan



3

ENQUIRY REPORT AGAINST THE IMPERSONATION CASE OF MR IFTIKHAR ALI S/O MR SHAUKAT ALI KHAN ROLL NO 452501174, MR MIRAJUL HAQ S/O SHAH NAZRAR KHAN ROLL NO 452201314, MR SHAKIRULLAH S/O MR INAYAT KHAN ROLL NO 452401382. MR SAEED MUHAMMAD S/O PIR MUHAMMAD ROLL NO 452401019, MR MUSHTAQ AHMAD S/O SHER BAHADAR ROLL NO 452301194, MR ZAKIRULLAH S/O MR ALAM ZEB ROLL NO 452200746, GOUHAR SHAH S/O MR NIAMAT KHAN ROLL NO 452201088, AMJAD AKHTAR S/O MR ALAM SHAH ROLL NO 451701238, MR SADDAM HUSSAIN S/O MR SARTAJ KHAN ROLL NO 452101177 AND MR SAJJAD AHMAD S/O MR SHER BAHADAR ROLL NO 452101058 UC PIR SADDI IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

No. 288

Date 5/8/2016

Committee Members

1; Mr Arshad Hussain (Chairman)

Principal GHS Babuzai Katlang Mardan

2; Mr Abdul Khaliq (Member)

ASDEO Sher Ghar Jalala Mardan

Dates of Enquiry

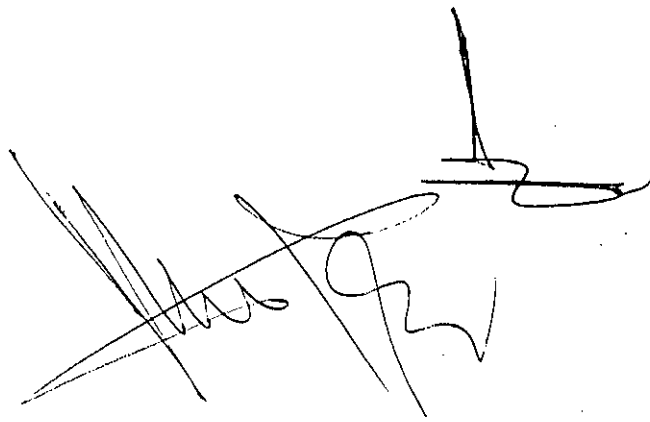
21/06/2016

01/07/2016

06/07/2016

10/07/2016

28/07/2016

A large, stylized handwritten signature in black ink is written across the bottom of the page. Above the signature, there is a rectangular stamp or mark, possibly a date stamp, which is partially obscured by the signature.

4

Venue of Enquiry

- 1; GHS Janga Mardan
- 2; DEO Male office Mardan
- 3; Village Pir Saddi Mardan
- 4; DEO Male office Mardan
- 5; ADSEO Sher ghar Jalala.

Subject

Enquiry against the above candidates in connection with the impersonation case in the NTS Test for the post of PST in Elementary and Secondary Education Mardan KPK.

Introduction

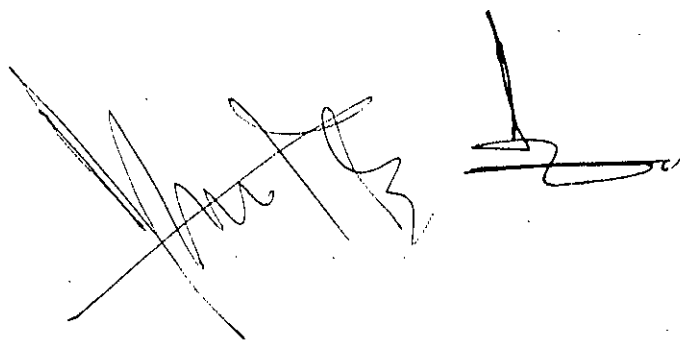
According to the DEO Male Mardan Notification No 4488 Dated 04/06/2016 a committee was constituted to find out the ground realities about the impersonation case in the examination of NTS against the above candidates belong to Union council Pir Saddi Tehsil Takht Bhai Mardan.

Brief History

An application against the above candidates was filed by some candidates in the office of DEO Male E/S Mardan and complained that

The following candidates

1. Mr. Iftikhar Ali S/O Mr Shaukat Ali Khan Union Council Pir Saddi

The block contains two handwritten signatures in black ink. The first signature is a large, stylized cursive signature that appears to be 'Mr. Iftikhar Ali'. The second signature is a smaller, more compact cursive signature. There are also some faint, illegible stamps or markings in the background of this section.

5

- Mirajul Haq S/O Mr Shah Nazar Khan Union council Pir Saddi
3. Shakirullah S/O Inayat Khan Union council Pir Saddi
 4. Saeed Muhammad S/O Pir Muhammad union council Pir Saddi
 5. Mushtaq Ahmad S/O Sher Bahadar U.C Pir Saddi
 6. Zakirullah S/O Alam Zeb U.C Pir Saddi
 7. Gouhar Shah S/O Niamat Khan U.C Pir Saddi
 8. Amjad Akhtar S/O Alam Shah U.C Pir Saddi
 9. Saddam Hussain S/O Sartaj Khan U.C Pir Saddi
 10. Sajjad Ahmad S/O Sher Muhammad U.C Pir Saddi

Had applied for PST through NTS in the month of November 2015 but in the tests of NTS they have not appeared by themselves and some other people have taken the test for them as impersonators.

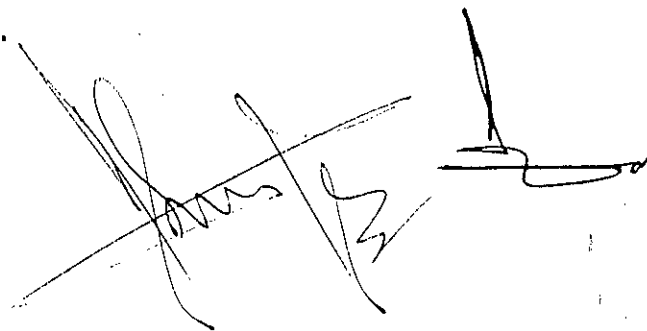
The DEO Male E/S Mardan constituted an enquiry committee comprising Mr Arshad Hussain Principal GHS Babuzai Katlang Mardan and MR Abdul Khaliq ADEO Sherghar Circle.

Procedures adopted

The committee met in the DEO office and decided to summon the above candidates to GHS Janga Mardan for an interview and investigation. All the above candidates were issued letters and also informed through mobile phones to attend the above school along with their original documents, attested photographs and original CNIC on 22/06/2016.

Findings

All the above candidates attended GHS Janga personally at 09 am on 22/06/2016. They were given questionnaires to be answered and checked all their documents, CNIC and photos and also judged their specimen signatures and the signatures provided by the NTS and signature in the NTS form. According to our knowledge and investigation we found the following facts about the candidates discussed as under.



cutting attestation

⑧

1. Mr Iftikhar Ali S/O Mr Shaukat Ali Khan Roll No ⁴⁵²⁵⁰¹¹⁷⁴ ~~452201154~~ CNIC No 16102-~~3242527-5~~ ²⁸⁷²⁴⁹⁹⁻⁵ U/C Pir Saddi had applied for the post of PST through NTS and had taken the test in the month of November 2015 and has been appointed as PST at GPS Pir Saddi No 1 Takht Bhai .His photograph had not been received from NTS at the time of his interview. So we requested to NTS to provide his video and after some days we found his video sent by the NTS Organization. He gave us written statement that he had taken the test himself but when we compared it with his real photo and through other reliable sources we came to know that he had not taken the test himself .At the time of submission his NTS form he had fixed a photo of another person named Rasheed Khan S/O Misal Khan village Pir Saddi on his own CNIC and had drawn Photostat .For authenticity we received photo copy of the CNIC of Mr Rasheed Khan which has been expired on 30/06/2015. The picture of both in the CNIC and the picture fixed on the NTS form of Iftikhar Ali are the same. In 2015 Mr Rasheed has renewed his CNIC on which the picture is of the impersonator who has taken the test for Mr Iftikhar Ali. It means that The picture taken during the test is of Mr Rasheed Khan S/O Misal Khan CNIC No 16102-0541588-9 who is serving in education department against PST post at GPS Sharif Malak Killi.

We got the mobile number of Rasheed Khan with the help of community members and called him to join us in the Office of DEO Male Mardan on 28/07/2016 along with original CNIC. He attended DEO office but had no CNIC and offered his original service card on which the same picture was fixed which had been fixed on the photo copy of Mr Iftikhar CNIC sent to NTS for test. We asked Mr Rasheed about the same pictures which he declared as the error of the NTS/Education department. We asked him to give us the photo copy of his service card but he did not honour. He also gave his written statement that he is not involved in this case and did not know the impersonator. However through our strenuous efforts it is clear that the impostor is Mr Rasheed Khan S/O Misal Khan village Khnjaryan pir saddi.

2. MR Mirajul Haq S/O Shah Nazar Khan U/C Pir Saddi Roli No 452201314 CNIC No 16102-9939053-1 is supposed to have taken the test on 29 th November 2015 at Ansi Degree College Mardan center and has been appointed against PST post at GPS Gul MIR KILLI Circle Sher Ghar . According to his verbal statement he had filled his admission form himself. When we compared his picture with the photo provided by NTS both were quite different from each other and after a deep investigation we found out that the impersonator was the same person Mr Rasheed Khan S/O Misal Khan village Pir Saddi who was also the impersonator in the case of Mr Iftikhar Ali. It means that Mr Rsheed Khan is a professional impersonator and has taken the test for both the candidates on different days.

3. The remaining eight candidates i.e Mr Shakirullah S/O Anayat Khan PST GPS Pir Saddi No 2, Saeed Muhammad S/O Pir Muhammad PST GPS Mishkar , Mushtaq Ahmad S/O Sher Bafhadar PST GPS Latif Abad Sherghar , Zakirullah S/O Alam Zeb PST GPS Qadar Shah Killi,

[Handwritten signatures]

7

Gouhar Shah S/O Niamat Khan PST GPS No 1 Pir Saddi , Amjad Akhtar S/O Alam Shah PST GPS Sharif Malak Killi, Saddam Hussain S/O Sartaj Khan PST GPS Latif Abad Sherghar and Sajjad Ahmad S/O Sher Bahadar PST GPS UC Pir Saddi were personally interviewed and examined their all relevant documents, pictures and attendance sheets provided by the NTS Organization. We found no proofs and indications to debar them from their services against the

It was a herculean task but by the grace of Almighty Allah We conducted the enquiry with our full devotion and honesty though we have been contacted by many renowned and the persons in ranks to write in the favour of guilty candidates and impersonators so as to prevent them from legal action against them and were threatened through different unknown vulgar and rogue yet being patriotic and loyal to our state we completed our mission with courage without any nepotism in the best interest of the public.

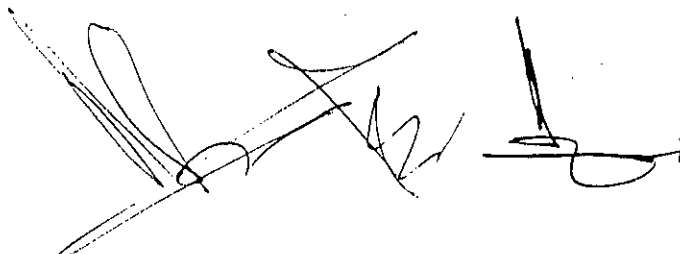
Conclusion

In the light of above findings it is concluded that

1. The case of MR Iftikhar Ali S/O Shaukat Ali UC Pirsaddi is clearly impersonation and the impersonator is Mr Rasheed Khan S/O Misal Khan U.C Pir Saddi (a professional impersonator)
2. The case of Mr Mirajul Haq S/O Shah Nazar Khan U.C Pir Saddi is crystal clear impersonation and the impersonator is the same person Mr Rasheed Khan S/O Misal Khan U.C Pir Saddi serving against PST post at GPS Sharif Malik
3. The remaining eight cases are clear and no suspicions were found to prove the cases as impersonation.

Recommendations

1. Both the teachers i.e Mr Iftikhar Ali S/O MR Shaukat Ali U.C Pir Saddi and MR Mirajul nHaq S/O Mr Shah Nazar Khan U.C Pir Saddi may be dealt according to the law and next deserving candidates be given a chance for appointment as per policy.
2. Mr Rasheed Khan S/O Misal Khan PST GPS Sharif Malak Killi CNIC No 16102-0541588-9 may please be treated according to the existing policy and be handed over to law enforcing agencies.



3. The cases of other eight cited teachers may please be honored and encouraged to continue their services on their posts.
4. The NTS Organization may please be requested to introduce bio-metric system .
5. Thumb impression should be made compulsory on the answer sheet as well as in the attendance sheet during the test and videos of the successful candidates of the merit list be sent to the concerned institutions and through special committees the deserving candidates be recommended for appointment.
6. NTS Organization may please be directed to depute expert teachers selected from Government educational institutions and not persons taken from the street.

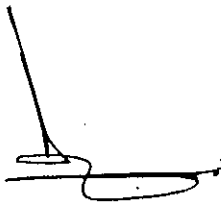
Enclosures

1. Original NTS form for admission of all the above candidates.
2. Replies of the given Questionnaires of all the above candidates And their statements.
3. Photographs of all the candidates provided to us by them.
4. Videos of all the candidates' attendance sheets during the test provided by the NTS.

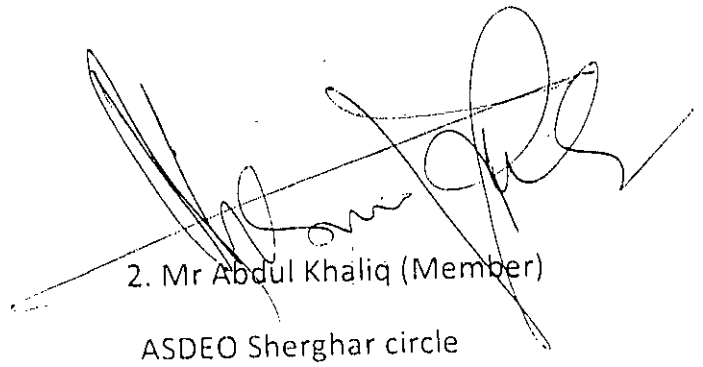
THE END

this enquiry report contains 08 pages and each has been signed by us.

Enquiry Officers



1. Mr Arshad Hussain (Chairman)
Principal GHS Babuzai Katlan Mardan



2. Mr Abdul Khaliq (Member)
ASDEO Sherghar circle

Government of the Khyber Pakhtunkhwa
Elementary and Secondary
Education Department

Screening Test for PST (BPS-12)

G-5

Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/
Diploma in Education from a recognized Institute, or
Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in
Education from a recognized University
Age Limit: 18-35 Years



اس فارم کا اطلاق صرف مذکورہ بالا آسامی کیلئے ہوگا۔ ایک سے زیادہ آسامیوں کے لئے دیگر درخواست فارم علیحدہ فیس کے ساتھ ارسال کریں

Eligibility Criteria:

A. Is your age according to the prescribed age limit for the desired Post as on 28-08-2015?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B. Is your Result Not Awaited? (Result declared before last date of apply.)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C. Do you have relevant / prescribed Qualification & Experience as mentioned in Advertisement?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If your reply is "Yes" to A, B & C above, only then please proceed further. Otherwise you are not eligible to apply.

01. Bank Online Deposit of Rs: 800/- from Designated Bank Branches. (For Only 5 Schools)

Bank Code	Deposit Date
-----------	--------------

*Note: Application Form will not be entertained without Original Deposit Slip (NTS Copy)

02. Desired Test City: Fill Only One Box (Mandatory)

Subject to a minimum of 200 candidates, otherwise the candidates will be assigned next nearest test city.

01. <input type="checkbox"/> Abbottabad	02. <input type="checkbox"/> Bannu	03. <input type="checkbox"/> Battagram	04. <input type="checkbox"/> Buner
05. <input type="checkbox"/> Charsadda	06. <input type="checkbox"/> Chitral	07. <input type="checkbox"/> Dera Ismail Khan	08. <input type="checkbox"/> Hangu
09. <input type="checkbox"/> Haripur	10. <input type="checkbox"/> Karak	11. <input type="checkbox"/> Kohat	12. <input type="checkbox"/> Kohistan
13. <input checked="" type="checkbox"/> Lakki Marwat	14. <input type="checkbox"/> Lower Dir	15. <input type="checkbox"/> Malakand	16. <input type="checkbox"/> Mansehra
17. <input checked="" type="checkbox"/> Mardan	18. <input type="checkbox"/> Nowshera	19. <input type="checkbox"/> Peshawar	20. <input type="checkbox"/> Shangla
21. <input type="checkbox"/> Swabi	22. <input type="checkbox"/> Swat	23. <input type="checkbox"/> Tank	24. <input type="checkbox"/> Tor Ghar
25. <input type="checkbox"/> Upper Dir			

Personal Information: Use CAPITAL letters and leave spaces between words.

03. Name in Full: IFTIKHAR-ALI	
04. Father's Name: SHAWKAT-ALI	
05. Candidate CNIC #: Write your own CNIC No. Or B Form No. 16102-2872499-5	
06. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	07. Date of Birth: Write your Correct Date of Birth otherwise you will be rejected. D D M M Y Y 02-02-1987
08. Postal Address: VILLAGE KHAT KALAY P/O QUTAB GARH TENSIL TAKHT BAHU City: MARDAN	

Rasheed Khan s/o Misal Khan
Pinsaddi.

Very very suspicious.

Phone No: (OFF) _____ (RES.) _____ (Mobile) 0345-9291730

Are you a Government Servant? Yes No
 If Yes, please attach NOC. If Yes then total years of continuous experience: _____

Are you a Disabled Person? Yes No
 Please attach Disability Certificate. If yes, state nature of your disability: _____

Religion: Muslim Non Muslim
 If Non Muslim, Please Specify: _____

Union Council: PIRSA DDI

District of Domicile: Fill Only One Box (Mandatory)

<input type="checkbox"/> Abbottabad	<input type="checkbox"/> Bannu	<input type="checkbox"/> Battagram	<input type="checkbox"/> Buner
<input type="checkbox"/> Charsadda	<input type="checkbox"/> Chitral	<input type="checkbox"/> Dera Ismail Khan	<input type="checkbox"/> Hangu
<input type="checkbox"/> Haripur	<input type="checkbox"/> Karak	<input type="checkbox"/> Kohat	<input type="checkbox"/> Kohistan
<input type="checkbox"/> Lakki Marwat	<input type="checkbox"/> Lower Dir	<input type="checkbox"/> Malakand	<input type="checkbox"/> Mansehra
<input checked="" type="checkbox"/> Mardan	<input type="checkbox"/> Nowshera	<input type="checkbox"/> Peshawar	<input type="checkbox"/> Shangla
<input type="checkbox"/> Swabi	<input type="checkbox"/> Swat	<input type="checkbox"/> Tank	<input type="checkbox"/> Tor Ghar
<input type="checkbox"/> Upper Dir			

15. Academic Information: (Please do not attach attested copies of your academic certificates at this stage)

- NTS will not issue Roll No Slip to those who have not filled in their academic record properly.
- Candidate should convert their grades into marks. (0 Level/A Level or any other degree having grade) (Low & A Level) (وہی گریڈ پر لکھیں اور اسے Low & A Level میں تبدیل کر کے درج کریں۔)
- Write exact degree name & major subject mention in certificate/transcript.

Certificate / Degree Name	Degree Title	Specialization / Major Subject	Year Passing	Obtained Marks / CGPA	Total Marks / CGPA	Board / University
Metric (10 Years)	SSC	E-U, PS, IS, Pa 15-st, G.S.C, M	2003 (A)	558	850	BISE Malakand
Intermediate (12 Years)	D-Com	Accounting	2005 (A)	826	1400	BTE Peshawar
Bachelor (14 Years)	B-Com	Accounting	2008 (A)	668	1400	University of Peshawar
Master (16 Years)	M-Com	Accounting	2012 (A)	321	700	University of Peshawar
NOTE: In case of Honors Degree calculate your marks As 14 years (first 2 years) and 16 years (last 2 years) & write in the relevant column.						
Bachelor (Hons) (14 Years)	B-Com Hons	Accounting	2009 A	367	700	University of Peshawar
MS / M. Phil / Ph.D (18 Years)						

16. Professional Qualification:

Certificate / Diploma	Certificate Name	Year Passing	Obtained Marks	Total Marks	Board / University
Relevant Diploma / Certificate / Degree	PTC	2010	611	900	I.Q.O. U. Islam Abad
M.Ed / M.A Education	<input type="checkbox"/> M.Ed <input type="checkbox"/> M.A Education				

School Code and Name Preferences:

(Mandatory) Forms without properly filled School Codes will be rejected.
 Please write accurate codes for the required school.
 List of schools with codes at NTS website (www.nts.org.pk).

برائے مہربانی اپنے مطلوبہ سکول سے متعلق صحیح کوڈز فراہم کریں۔
 سکولز اور متعلقہ کوڈز NTS ویب سائٹ (www.nts.org.pk) پر ملاحظہ کریں۔

#	School Code	District	School Name
1.	281293	Mardan	GPS Latif Abad
2.	281296	Mardan	GPS Pirgaddi No1
3.	281298	Mardan	GPS Sharif Malak Kaly
4.	281299	Mardan	GPS Gul mir Kaly
5.	281292	Mardan	GPS Gul Ahmad Kaly

Undertaking By The Applicant:

Likhaq Ali d/s/w of Shaukat Ali do hereby solemnly declare and affirm that I have read and understood the instructions and conditions for appearing in the NTS Test, and I have filled-up the application form as per instructions given below. In case of any information contained herein is found at any stage to be missing, untrue, false or forged, my candidature can be canceled at any stage (even after employment, if so revealed later), and I shall be liable to legal action.

Picture 2
 Affix your recent passport size color photograph with Stapler
 تصویر لازماً منسلک کریں بصورت
 رفاہ عمل میں نہیں لایا جائیگا۔

Date: 22-8-2015

Signature of the Candidate [Signature]

Check List Provide the following documents other wise Application Form will not be entertained

- Original Bank Deposit Slip (NTS Copy)
- 2 Passport size color photograph to be attached in the picture box given on page (1 & 3)
- Copy of CNIC

General Instructions / Information:

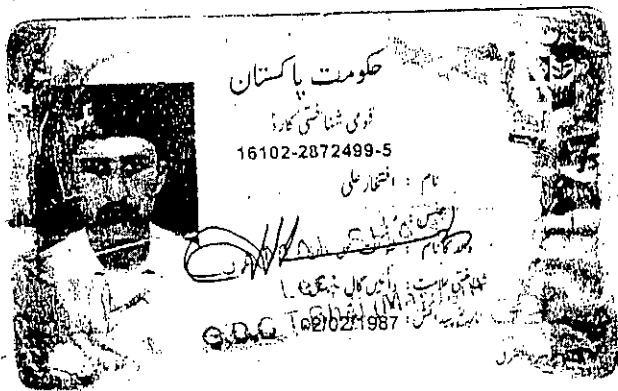
- By Hand submission of Application Form is not allowed.
- Mobile Phones are not allowed in Test Center premises.
- Use separate envelop and separate application form for each post you are applying for.
- **Last date for submission of application form is Friday 28th August, 2015.**
- **Applications received on or after Saturday 29th August, 2015 will be rejected.**
- Application should reach NTS office latest by last date of submission of Application Form.
- NTS will not be responsible for late receiving of application through courier / Pakistan Post etc.

HELP LINE:

UAN : +92-51-844-444-1
 Website : www.nts.org.pk

Please Send Application Forms to:

ESED KP (Project)
 National Testing Service
 1-E, Street No. 46, Sector I-8/2,
 Islamabad.



NTS

National Testing Service-Pakistan

NTS COPY

Elementary and Secondary
Education Department

Date: 21-09-2013

Unique ID: _____

Branch Code: 1957

Branch Name: HBL Jaleel

ONLINE DEPOSIT SLIP

(Please deposit the money in the bank & fill the selected bank)

<p>Allied Bank Limited Primary and Subsidiary Bank of Pakistan (Limited)</p> <p>Branch: I-R Markaz Branch Islamabad (0140947)</p> <p>Account: NTS-Pakistan Collection A/C No. 0010008325640018</p> <p>Note: Bank Service Charges Free of Cost</p>	<p>Commercial Bank</p> <p>Branch: I-R Markaz Branch, Islamabad (1501)</p> <p>Account: NTS-Pakistan A/C No. 647943831003773</p> <p>Note: Bank Service Charges Free of Cost</p>
<p>UNITED BANK</p> <p>Branch: Cantt Br Kashmir Road Rawalpindi (10041)</p> <p>Account: NTS-Pakistan A/C No. 217767828</p> <p>Note: Bank Service Charges Free of Cost</p>	<p>HABIB BANK</p> <p>Branch: IV Shalimar Recording Co/ISB (1742)</p> <p>Account: NTS-Pakistan A/C No. 17427900464503</p> <p>Note: Bank Service Charges Free of Cost</p>

*Note: Desired Bank Stamp is required on the Deposit Slip & Send Original Deposit Slip (NTS Copy) along Application Form to NTS Office

Application Form will not be entertained without Original Deposit Slip (NTS Copy)

Applicant's Name: MUKKAS ALI
 Father Name: SHAKKAT ALI
 CNIC No: 16102-2872499-5
 B Form No: _____


Amount in Ru: 800/- Amount in word: Eight Hundred Rupees Only
 Non Refundable Non Transferable

[Signature]
Applicant's Signature

Office

MADE BANK DEPOSIT
 21 AUG 2013
CASH RECEIVED

V4D8XV 16102-2872499-5
کتابوں کے قلمبازوں کی فہرست
تاریخ: 17/06/2005
تاریخ: 31/05/2017
کتابوں کے قلمبازوں کی فہرست



افتخار علی ولد شوکت علی تاریخ پیدائش ۱۵۶



مستقل پندر ڈیگنہ و قاضی قتل گڑھ تحصیل تحت بحالی ضلع مردان
عارضی پتہ: ایفٹا

۱۔ لفظی قابلیت :- میٹرک و انڈر گریڈ سے

D.Com نیاور بورڈ سے

B.Com نیاور یونیورسٹی سے

M.Com نیاور یونیورسٹی سے

P.St علامہ اقبال اوپن یونیورسٹی سے

پست
۱۱۶
۱۱۶

سوال ۳ جواب ۱۔ میں نے N.T.S ٹسٹ اس رد لکھ کر دیا تھا 452501174

امتحانی جگہ :- ANSI Degree college, opposite Mandan Medical Camps, Mandan.

سوال ۴ جواب ۲۔ میں Pst کالٹ خود N.T.S میں خود دیا ہے۔

سوال ۵ جواب ۳۔ فی الحال میں صرف Pst پوسٹ پر ہوں۔

سوال ۶ جواب ۴۔ ہاں میرا پوسٹ Pst پر ہوتی ہے۔

سوال ۷ جواب ۵۔ میرا تعلق پندر بورڈ یونیورسٹی سے ہے۔

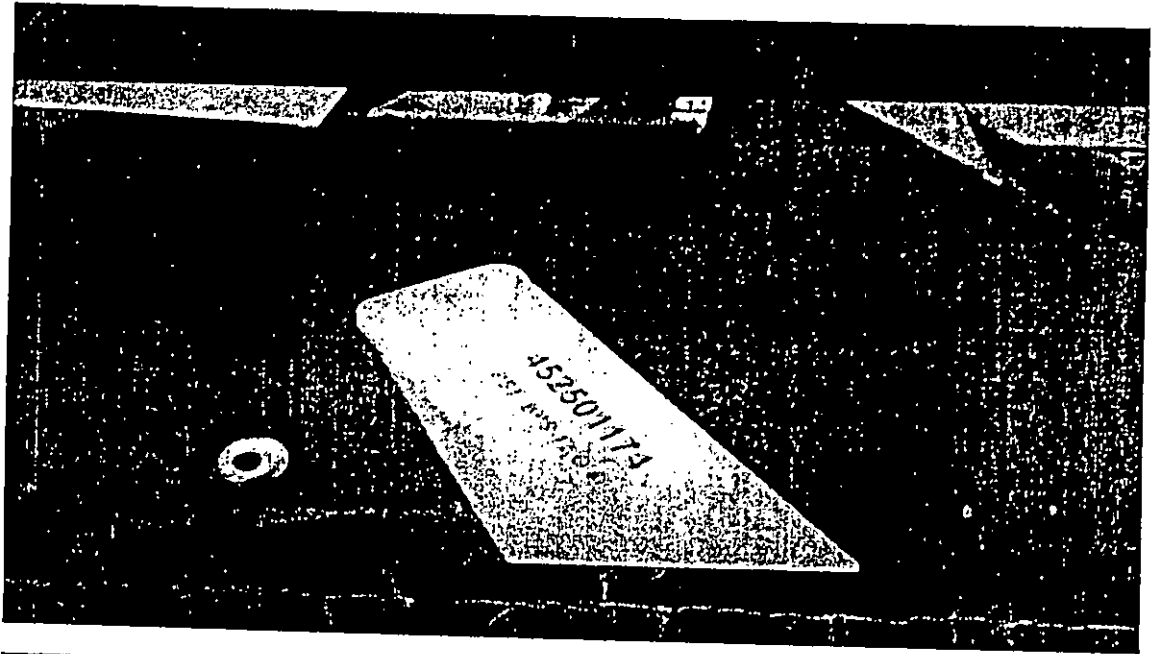
سوال ۸ جواب ۶۔
۱ سوال
۲ سوال
۳ سوال

سوال ۹ جواب ۷۔ میں نے N.T.S امتحان خود دیا تھا اور میرے مطابق میری
لکھائی پوسٹ ہے۔

سوال ۱۰ جواب ۸۔ 0345-9291780

Requirements: ① Attendance and vedo

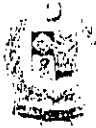
Jiikhay Ali
D s/o Shaikat Ali Khan.



[Handwritten signature]



حکومت پاکستان



10/05/2015

پیش رو

والہ آباد، لاہور

شاخہ نمبر: 1001

1001

میراج علی خان

میراج علی خان

'E'

NTS National Testing Service-Pakistan

INTERCOPY

Date: 18-08-2015

Unique ID: _____ Branch Code: 1188 Branch Name: UBL

ONLINE DEPOSIT SLIP

ALFIA BANK LIMITED Branch: <u>14, Feroz Road, Faisalabad (9140047)</u> NTS Pakistan Collection: <u>011000121040011</u> Note: Bank Service Charges Free of Cost	ALFIA BANK LIMITED Branch: <u>14, Feroz Road, Faisalabad (9140047)</u> NTS Pakistan: <u>011000121040011</u> Note: Bank Service Charges Free of Cost
UNITED BANK LIMITED Branch: <u>14, Feroz Road, Faisalabad (9140047)</u> NTS Pakistan: <u>217744224</u> Note: Bank Service Charges Free of Cost	HABIB BANK LIMITED Branch: <u>14, Feroz Road, Faisalabad (9140047)</u> NTS Pakistan: <u>1147305064300</u> Note: Bank Service Charges Free of Cost

Applicant's Name: Miraj-ul-haq

Father's Name: Shah Nazam Khan

CNIC No: 16102-9939053-1

Amount Rs: 800/- Amount in words: Eight Hundred Rupees Only

Miraj-ul-haq
Applicant's Signature

[Signature]



شناختی نمبر: 16102-9939053-1
نام: اہلیہ: U685GR
موجودہ پتہ: گوجرانوگ، ہنگامہ پورہ، تحصیل قنبرا، ضلع ملتان، پاکستان

مسکون پتہ: ایضاً

تاریخ: 25/10/2013
تاریخ: 25/10/2023
گنشمہ کارڈ کے برائے رجسٹریشن نمبر ہیں ذیل ہیں



761513

REGISTRATION FORM

Reg. No. In the Block by

Government of the Khyber Pakhtunkhwa
Elementary and Secondary
Education Department

NTS

Screening Test for PST (BPS-12)

G-5



Eligibility Criteria:

A. Is your age according to the prescribed age limit for the desired Post as on 28-08-2015?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B. Is your Result Not Awaited? (Result declared before last date of apply.)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C. Do you have relevant / prescribed Qualification & Experience as mentioned in Advertisement?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If your reply is "Yes" to A, B & C above, only then please proceed further. Otherwise you are not eligible to apply.

01. Bank Online Deposit of Rs: 800/- from Designated Bank Branches.

Bank Code	UBL Te Bhai 1188	Deposit Date	18-08-2015
-----------	------------------	--------------	------------

02. Desired Test City: Fill Only One Box

Subject to a minimum of 200 candidates, otherwise the candidates will be assigned next nearest test city.

01. <input type="checkbox"/> Abbottabad	02. <input type="checkbox"/> Bannu	03. <input type="checkbox"/> Battagram	04. <input type="checkbox"/> Buner
05. <input type="checkbox"/> Charsadda	06. <input type="checkbox"/> Chitral	07. <input type="checkbox"/> Dara Ismail Khan	08. <input type="checkbox"/> Hangu
09. <input type="checkbox"/> Haripur	10. <input type="checkbox"/> Karak	11. <input type="checkbox"/> Kohat	12. <input type="checkbox"/> Kohistan
13. <input type="checkbox"/> Lakki Marwat	14. <input type="checkbox"/> Lower Dir	15. <input type="checkbox"/> Malakand	16. <input type="checkbox"/> Mansehra
17. <input checked="" type="checkbox"/> Mardan	18. <input type="checkbox"/> Nowshera	19. <input type="checkbox"/> Peshawar	20. <input type="checkbox"/> Shangla
21. <input type="checkbox"/> Swabi	22. <input type="checkbox"/> Swat	23. <input type="checkbox"/> Tank	24. <input type="checkbox"/> Tor Ghar
25. <input type="checkbox"/> Upper Dir			

Personal Information: Use CAPITAL letters and leave spaces between words.

03. Name in Full: M I R A J U L - H A Q

04. Father's Name: S I A A H - M A Z I A R - K H A N

05. Candidate CNIC #: _____
Write your own CNIC No. On B Form No.

06. Gender: Male Female

07. Date of Birth: With your Correct Date of Birth otherwise you are disqualified
D D M M Y Y: 2 5 - 0 7 - 1 9 8 6

08. Postal Address: village Gufrano Kalley P/O Pirsaddi Teh. Takht Bahi
Dist/ Mardan city: Mardan

All correspondence will be made on this address through courier service or ordinary postal service.

CE

Rasheed Khan
S/o Misal Khan
Pir Saddi

~~inc~~
personnel

Phone No: (OFF) 0300-5776137 (RES.)

(Mobile) 0313-1418958

10. Are you a Government Servant? Yes No If Yes then total years of continuous experience: _____

11. Are you a Disabled Person? Yes No If yes, state nature of your disability: _____

12. Religion: Muslim Non Muslim If Non Muslim, Please Specify: _____

13. Union Council: PTIR-SIADDI

14. District of Domicile: Fill Only One Box

01. <input type="checkbox"/> Abbottabad	02. <input type="checkbox"/> Bannu	03. <input type="checkbox"/> Battagram	04. <input type="checkbox"/> Buner
05. <input type="checkbox"/> Charsadda	06. <input type="checkbox"/> Chitral	07. <input type="checkbox"/> Dera Ismail Khan	08. <input type="checkbox"/> Hangu
09. <input type="checkbox"/> Haripur	10. <input type="checkbox"/> Karak	11. <input type="checkbox"/> Kohat	12. <input type="checkbox"/> Kohistan
13. <input type="checkbox"/> Lakki Marwat	14. <input type="checkbox"/> Lower Dir	15. <input type="checkbox"/> Malakand	16. <input type="checkbox"/> Manohra
17. <input checked="" type="checkbox"/> Mardan	18. <input type="checkbox"/> Nowshera	19. <input type="checkbox"/> Peshawar	20. <input type="checkbox"/> Shangla
21. <input type="checkbox"/> Swabi	22. <input type="checkbox"/> Swat	23. <input type="checkbox"/> Tank	24. <input type="checkbox"/> Tor Ghar
25. <input type="checkbox"/> Upper Dir			

15. Academic Information: (Please do not attach attested copies of your academic certificates at this stage)

Certificate / Degree Name	Degree Title	Specialization / Major Subject	Year Passing	Obtained Marks / CGPA	Total Marks / CGPA	Board / University
Matric (10 Years)	SSC	Arts	2002	518	850	Peshawar
Intermediate (12 Years)	F.A	Arts	2004	690	1100	Mardan
Bachelor (14 Years)	B.A	"	2006	279	550	Peshawar
Master (16 Years)	MBA	Finance	2012	1846	2400	AIKUM
Bachelor (Plus) (15 Years)						
M.S / M. Phil / Ph.D (18 Years)						

16. Professional Qualification:

Certificate / Diploma	Certificate Name	Year Passing	Obtained Marks	Total Marks	Board / University
Relevant Diploma / Certificate / Degree	PTC	2007	632	900	Allama Iqbal Open University
M.Ed / M.A Education	<input type="checkbox"/> M Ed <input type="checkbox"/> M A Education				

School Code and Name Preferences: (میلٹر/کلو میٹر) ہمارے پاسکول کے نام اور اسکول کوڈ کے لیے

Please write school codes for the required school.

ہر مطلوبہ اسکول کے لیے اسکول کوڈ لکھیں۔

ہر اسکول کے نام کے ساتھ اسکول کوڈ لکھیں۔

Sr. #	School Code	District	School Name
1.	281292	Marclan	GPS. Gul. Ahmad. Kally.
2.	281293	Marclan	GPS - Latif Khan Abad Kally.
3.	281295	"	GPS - No-2. Pirsaddi
4.	281298	"	GPS - No-1 Pirsaddi
5.	281299	"	GPS - Gul Mir Kally.

Undertaking By The Applicant:

I Muqj-ud-din do hereby solemnly declare and affirm that I have read and understood the instructions and conditions for appearing in the NTS Test, and I have filled-up the application form as per instructions given below. In case of any information contained herein is found at any stage to be missing, untrue, false or forged, my candidature can be canceled at any stage (even after employment, if so revealed later), and I shall be liable to legal action.

Affix your recent passport size color photograph
 آواز لگانے کے لیے پاسپورٹ سائز کی رنگین تصویر لٹائی جائے۔

Date: 18-08-2015 Signature of the Candidate: Muqj-ud-din

Check List Provide the following documents other wise Application Form will not be entertained

- ...
- ...
- ...

Important Instructions / Information:

- The NTS office is located at ...
- Applications received on or after Saturday 29th August, 2015 will be rejected.
- Application should reach NTS office latest by last date of submission of Application Form.
- NTS will not be responsible for late receipt of application through courier / post, etc.

HELP LINE:

UAN : +92-51-844-444-1
 Website: www.nts.org.pk

Please Send Application Forms to:

ESED KP (Project)
 National Testing Service
 1-E, Street No. 46, Sector I-8/2,
 Islamabad.



NTS**NATIONAL TESTING SERVICE PAKISTAN**Attendance Sheet Candidates

Page 48 of 48

4582-MARDAN22-PST BPS-12(G-3)Batch-8 (09:00 AM)ESED KPK TEST 2015Sunday 29th November, 2015Invigilator Name AMAN KHAN Supervisor Name M. ISLAM

Sr.#	Roll #	Candidate Name	Candidate Signature
1	452201306	JAWAD ALI	
2	452201307	SHAH HUSSAIN	
3	452201308	SHER ALAM	
4	452201309	SHAHID ALI	
5	452201310	MEER AZAM KHAN	
6	452201311	FATEH KHAN	
7	452201312	ABDUL WALI KHAN	
8	452201313	SHAH FAISAL	
9	452201314	MIRAJ UL HAQ	
10	452201315	NAZIR MUHAMMAD	
11	452201316	SHAH ZEB	
12	452201317	SAJJAD ALI	
13	452201318	MOHAMMAD USMAN FAISAL	
14	452201319	ASAD ULLAH	
15	452201320	ABDULLAH	
ONLY SUPERVISOR 1. Mark Absent With Red Ink Only			TOTAL PRESENT (15)

Invigilator Signature

Supervisor Signature

Chief Supervisor Signature



حوالہ نمبر: 1 معراج الحق ولد شاہ نظر خان تاریخ پیدائشی: 5-07-1986

حوالہ نمبر: 2 مستقل اور حاضر پتہ:

گاہوں گزرتوں کی ڈائمنہ ڈیگری

حوالہ نمبر: 3 تعلیمی قابلیت

from - پشاور بورڈ - میٹرک
from - Mardan Board - F.A.

from - Peshawer University - B.A.

from - ANIKUM-university mardan - M.B.A Finance

from - A.O.U - P.T.C.

NTS test: 452201314 اور میں نے NTS میں

ANSI degree collage opposite side mardan. میں دیا تھا - medical complex

حوالہ نمبر: 4 میں نے Pst امتحان NTS کا منت خود دیا تھا

حوالہ نمبر: 5 فی الحال میں صرف Pst پوسٹ پر ہوں

حوالہ نمبر: 6 یاں میرا پوسٹ Pst پر ہوٹا ہے

حوالہ نمبر: 7 میرا تعلق پشاور یونیورسٹی کونسل سے ہے

حوالہ نمبر: 8 معراج الحق (1) - معراج الحق (2) - معراج الحق (3)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN

Dated Mardan the 06/08/2016

No 5712

SHOW CAUSE NOTICE

I, Siraj Muhammad, District Education Officer (Male) Mardan as a competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule, 2011 do hereby serve you, Mr. Rashid Khan S/O Misal Khan Working against PST Male post at GPS Sharif Malik Killi U.C Pir Saddi District Mardan

1. That the consequent upon the complaints received by the undersigned regarding your alleged impersonation for the appointment against PST Male post in the E&SE Department District Mardan in place of Mr. Iftikhar Ali S/o Mr. Shaukat Ali Khan during the 'NTS' held on 28/11/2015 for U/C Pir Saddi District Mardan
2. That an inquiry committee was constituted to conduct inquiry in the case, after conducting inquiry by the inquiry committee they proved your impersonation and recommended you for major penalty i.e. Removal from Service
3. That you being Civil Servant have committed inefficiency and misconduct by bringing ill name for the department by impersonating during the said examination, hence liable to be proceeded against under the E&D Rules, 2011.
4. You are, therefore, required to show cause as to why the Major Penalty of Removal from Service should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this notice is received within fourteen (14) 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.

Siraj Muhammad
District Education Officer
(Male) Mardan

Endst No: 5713

Dated: 06-08-2016.

Copy forwarded to:-

1. SDEO (M) Takht Bhal.
2. Mr. Rashid Khan S/O Misal Khan PST GPS Sharif Malik Killi.
3. Head Teacher GPS Sharif Malik Killi.
4. P/File Rashid Khan.

6/8/16
District Education Officer
(Male) Mardan

Final Hearing of Rashid Khan P.S.T, G.P.S
Chowke Malak Wally District Mardan
Dated: 25-10-2016 at 11 A.M

آپ پر الزام ہے کہ آپ افسانہ ولد ستوت علی 5-27-5
Cnic No: 161023242 اور معراج الحق ولد شہ زہر خان 1-3-9939053-16102
آپ کی (N.Ts) Pst ٹسٹ میں بیٹھے تھے۔ موجودہ شواہد جو
آپ کے خلاف ہیں اس پر آپ کے خلاف حکیمانہ کارروائی ہو سکتی
ہے آپ اپنی ہفتائی میں کیا کہنا چاہتے ہیں۔ جواب دیا
کہ میرے پاس اپنی ہفتائی کے حوالے سے کوئی ثبوت نہیں ہو سکتا
اور تمام الزامات سے میں انکار کرتا ہوں جو مجھ پر لگائے گئے ہیں
میں میرا بیان ہے۔

25/10/16
شہ زہر خان ولد ستوت علی
آئی ڈی کارڈ نمبر 16102-0541588-9
(Expired on 30-6-2015)
No New I.D card.

Departmental Representation
Mulla Haroon
16101-4819092-1

گواہ نمبر 2
محکمہ اقبال
A.D.O (Primary)
D.E.O (M) Mardan
16102 5712276-7

گواہ نمبر 1
26/10/2016
محکمہ اقبال
A.D.O Secondary
D.E.O (M) Mardan
16102-48951006-3

214/13

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

Service Appeal No. 275/2017

Rashid Khan

VS

Education deptt:

.....

REJOINDER ON BEHALF OF APPELLANT

.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

- (1-11) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Incorrect while para-1 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover the contention of respondent regards previous record is not true, the same is no concerned with the present case..
- 2 Incorrect. While para-2 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, the respondent didn't observe procedure provided in E&D Rules, 2011 which is mandatory in law before imposing major penalty.
- 3 Incorrect. While para-3 of the appeal is correct as mentioned in the main appeal of the appellant.
- 4 Incorrect. While para-4 of the appeal is correct as mentioned in the main appeal of the appellant.
- 5 No comments.

GROUND:

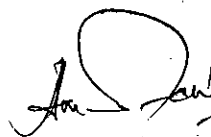
- A) Incorrect. While para-A of the appeal is correct as mentioned in the main appeal of the appellant..
- B) Incorrect. While para-B of the appeal is correct as mentioned in the main appeal of the appellant.
- C) Incorrect. While para-C of the appeal is correct as mentioned in the main appeal of the appellant.

- D) Incorrect. While para-D of the appeal is correct as mentioned in the main appeal of the appellant.
- E) Incorrect. While para-E of the appeal is correct as mentioned in the main appeal of the appellant.
- F) Incorrect. While para-F of the appeal is correct as mentioned in the main appeal of the appellant.
- G) Incorrect. While para-G of the appeal is correct as mentioned in the main appeal of the appellant.
- H) Incorrect. While para-H of the appeal is correct as mentioned in the main appeal of the appellant.
- I) Legal.

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


APPELLANT

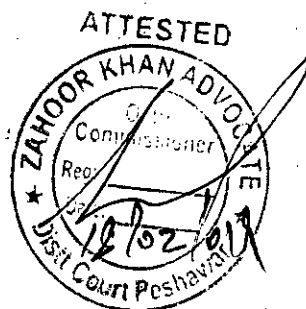
Through:


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of appeal and rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able tribunal.


DEPONENT



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

Service Appeal No. 275/2017

Rashid Khan

VS

Education deptt:

.....
REJOINDER ON BEHALF OF APPELLANT
.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-11) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Incorrect while para-1 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover the contention of respondent regards previous record is not true, the same is no concerned with the present case..
- 2 Incorrect. While para-2 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, the respondent didn't observe procedure provided in E&D Rules, 2011 which is mandatory in law before imposing major penalty.
- 3 Incorrect. While para-3 of the appeal is correct as mentioned in the main appeal of the appellant.
- 4 Incorrect. While para-4 of the appeal is correct as mentioned in the main appeal of the appellant.
- 5 No comments.

GROUNDS:

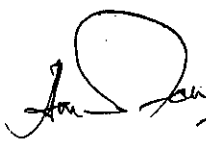
- A) Incorrect. While para-A of the appeal is correct as mentioned in the main appeal of the appellant..
- B) Incorrect. While para-B of the appeal is correct as mentioned in the main appeal of the appellant.
- C) Incorrect. While para-C of the appeal is correct as mentioned in the main appeal of the appellant.

- D) Incorrect. While para-D of the appeal is correct as mentioned in the main appeal of the appellant.
- E) Incorrect. While para-E of the appeal is correct as mentioned in the main appeal of the appellant.
- F) Incorrect. While para-F of the appeal is correct as mentioned in the main appeal of the appellant.
- G) Incorrect. While para-G of the appeal is correct as mentioned in the main appeal of the appellant.
- H) Incorrect. While para-H of the appeal is correct as mentioned in the main appeal of the appellant.
- I) Legal.

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


APPELLANT

Through:


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of appeal and rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able tribunal.


DEPONENT



12/11/16

Annex - A.

4

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.
REMOVAL FROM SERVICE.

Whereas Mr, Rashid Khan PST GPS Sharif Malak Killi Takht Bhai was invalid in impersonation case in the recruitment of NTS held on 28-11-2015.

And whereas in inquiry committee was constituted to conduct inquiry and find out the fact.

And whereas the inquiry committee has conducted inquiry in proved the charges leveled against you.

And whereas a show cause notice was served upon you, and given chance of hearing on 26-10-2016. But your response was not convincing in defense.

Now the unsigned being competent authority is pleased to remove Mr, Rashid Khan SPT GPS Sharif Malak Killi from Govt service with immediate effect in the light of rules (4) b-III of E&D rules 2011.

(ZIA UD DIN)
DISTRICT EDUCATIO OFFICER
(MALE) MARDAN

Endst: No 8539-9 /

Dated 11/11 /2016.

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director NTS Islamabad.
3. Deputy Commissioner Mardan.
4. DPO Mardan with request the register FIR against the above official as already requested vide this office No.6602 Dated 31-08-2016.
5. SDEO (M) Takht Bhai.
6. District Accounts Mardan.
7. Head Teacher GPS Sharif Malik Killi Takht Bhai.
8. Mr, Rashid Khan PST GPS Sharif Malak Killi Takht Bhai (Through Registry).
9. EMIS Branch Local office Mardan.

DISTRICT EDUCATIO OFFICER
(MALE) MARDAN

5586

Sh. J. D. (M) Pr. No. 597 date 26-9-07

17

The Dy. D.O. (M) Pr.

T. Bhai

Annex "B"

visit report GPS Khonjaryan

Memo,

I visited the GPS Khonjaryan along with you on 22-9-07 and you have directed to send report of GPS of the said school.

It is stated that Mr. Badar ul Hassan H/Teacher was present and was busy in teaching, while Mr. Ali Gohar PST was on ^{marked} leave, Mr. Rashid Khan PST was on leave with out application and permission. Mr. Injamullah Chowkidar signed in the Attendance Register but physically absent but later on report to school. The H/Teacher complain verbally complained that the Chowkidar not performing his duty. So report is submitted for your kind information.

Submitted

[Signature]

Assistant Dist Officer
Circle Sher Garh
T. Bhai Mardan

36

THE DY. DIST. OFFICER
PRIMARY TAKHT BHAI
No. 9490 / F.No/Rasheed Khan/PST
Dated Takht Bhai the 21/7 /2008.

Amna BII

To
The Executive District Officer
Elementary & Secy. Education
Mardan.

Subject:- APPLICATION OF THE CHAIRMAN PTC GPS KHANJARYAN AGAINST
Memo: RASHEED KHAN PST GPS KHANJARYAN.

Enclosed find herewith the self explanatory complaint of the Chairman of the PTC
GPS Khanjaryan against Rasheed-Khan PST of the said school and consequent report of the A.D.O
Shergarh Circle against this teacher. This teacher is neither wanted nor fit in this Sub Division and
may be transferred to Mardan Sub Division.

Encl: 02

Endst: No. 9491

Copy to the:
A.D.O Sher Garh w/r to his No.663 dt 17/7/2008.

M.D
o/c
DEPUTY DISTRICT OFFICER
(M) PRIMARY TAKHT BHAI.

Amna BII
o/c
DEPUTY DISTRICT OFFICER
(M) PRIMARY TAKHT BHAI.
District Education
Officer (M) Mardan

Office of ~~the~~
Circle Sher Garh

No. 663 date 17-7-08

34

The Dy DO (M) Prig,

T. Bhan

PTC

Subj: Application of the Chairman G.P.S. Khargayjan against Rasheed Khan
PST G.P.S. Khargayjan

Memo,

I have the honour to submit here with the application of Akbar Ali Chairman ^{PTC} with the remarks that the application is based on fact and the said Teacher is irregular in his duty and is a disobedient Teacher.

1. He has been asked to provide Service Book to Circle Office vide Dy DO T. Bhan No 9622 dated 23-6-08 but failed to comply with

2. He has been asked repeatedly to deposit the pay of the absence period in Govt Treasury but failed to obey and used foul words against the high authority.

It is recommended that the said Teacher may be transferred far away out of Teh. T. Bhan and be ~~not~~ suspended for three months.

Dy. no. 9535
1877/00

J. Hassan

Assistant Dist Officer
Circle Sher Garh
Bhai Mardan

Accepted


J. Hassan

بیت ماه ابریل
 رتبه حاضری مدرین متعلقه گورنمنٹ پبلسکول خیرپور تحصیل خجستان ضلع سرگودھا

ردیف	نام و نام خانوادگی	تاریخ پیدائش	رتبہ اول			رتبہ دوم			رتبہ سوم			نوٹس
			آر	دستخط	روزگار	آر	دستخط	روزگار	آر	دستخط	روزگار	
1	محمد علی											
2	محمد علی											
3	محمد علی											
4	محمد علی											
5	محمد علی											
6	محمد علی											
7	محمد علی											
8	محمد علی											
9	محمد علی											
10	محمد علی											
11	محمد علی											
12	محمد علی											
13	محمد علی											
14	محمد علی											
15	محمد علی											
16	محمد علی											
17	محمد علی											
18	محمد علی											
19	محمد علی											
20	محمد علی											
21	محمد علی											
22	محمد علی											
23	محمد علی											
24	محمد علی											
25	محمد علی											
26	محمد علی											
27	محمد علی											
28	محمد علی											
29	محمد علی											
30	محمد علی											
31	محمد علی											

ردیف	نام و نام خانوادگی	رتبہ	سال	مذاہب	مذہب	مذاہب	مذہب	مذاہب	مذہب	مذاہب	مذہب	مذاہب
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												

رکھن پور پبلک اسکول سرگودھا

①

Annex C.

Office of the Principal

GHS Babuzai Katlang Mardan

Dated 04/08/2016 NO 280

District Education Officer Male


Elementary And Secondary Education

Mardan

subject; ENQUIRY REPORT AGAINST THE IMPERSONATION CASE OF MR IFTIKHAR ALI S/O MR SHAUKAT ALI KHAN KHAN ROLL NO 452501174, MR MIRAJUL HAQ S/O SHAH NAZRAR KHAN ROLL NO 452201314, MR SHAKIRULLAH S/O MR INAYAT KHAN ROLL NO 452401382. MR SAEED MUHAMMAD S/O PIR MUHAMMAD ROLL 452401019, MR MUSHTAQ AHMAD S/O SHER BAHADAR ROLL NO 452301194 ,MR ZAKIRULLAH S/O MR ALAM ZEB ROLL NO452200746, GOUHAR SHAH S/O MR NIAMAT KHAN ROLL NO 452201088, AMJAD AKHTAR S/O MR ALAM SHAH ROLL NO 451701238 , MR SADDAM HUSSAIN S/O MR SARTAJ KHAN ROLL NO 452101177 AND MR SAJJAD AHMAD S/O MR SHER BAHADAR ROLL NO 452101058 UC PIR SADDI IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

Respected Sir

please find the attached enquiry report



PRINCIPAL

GHS BABUZAI KATLANG

MARDAN

(2)

ENQUIRY REPORT AGAINST ; - THE IMPERSONATION CASE OF MR IFTIKHAR ALI S/O MR SHAUKAT ALI KHAN KHAN ROLL NO 452501174, MR MIRAJUL HAQ S/O SHAH NAZRAR KHAN ROLL NO 452201314, MR SHAKIRULLAH S/O MR INAYAT KHAN ROLL NO 452401382. MR SAEED MUHAMMAD S/O PIR MUHAMMAD ROLL NO 452401019, MR MUSHTAQ AHMAD S/O SHER BAHADAR ROLL NO 452301194, MR ZAKIRULLAH S/O MR ALAM ZEB ROLL NO 452200746, GOUHAR SHAH S/O MR NIAMAT KHAN ROLL NO 452201088, AMJAD AKHTAR S/O MR ALAM SHAH ROLL NO 451701238, MR SADDAM HUSSAIN S/O MR SARTAJ KHAN ROLL NO 452101177 AND MR SAJJAD AHMAD S/O MR SHER BAHADAR ROLL NO 452101058 UC PIR SADDI IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

Assigned by

District Education Officer Male Elementary and Secondary

Mardan

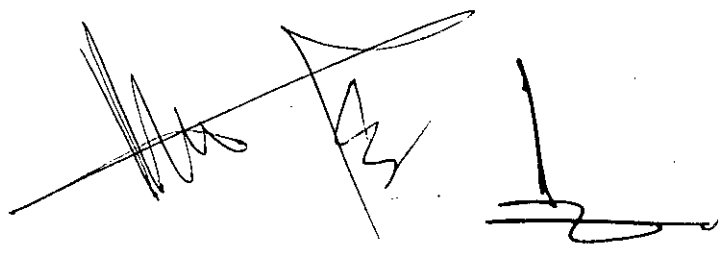
Date of Submission

04/08/2016

Enquiry Officers

1. Mr Arshad Hussain Principal GHS Babuzai Katlang Mardan

2. Mr Abdül Khaliq ASDEO Sher Ghar Circle Mardan



3

ENQUIRY REPORT AGAINST THE IMPERSONATION CASE OF MR IFTIKHAR ALI S/O MR SHAUKAT ALI KHAN ROLL NO 452501174, MR MIRAJUL HAQ S/O SHAH NAZRAR KHAN ROLL NO 452201314, MR SHAKIRULLAH S/O MR INAYAT KHAN ROLL NO 452401382. MR SAEED MUHAMMAD S/O PIR MUHAMMAD ROLL 452401019, MR MUSHTAQ AHMAD S/O SHER BAHADAR ROLL NO 452301194, MR ZAKIRULLAH S/O MR ALAM ZEB ROLL NO 452200746, GOUHAR SHAH S/O MR NIAMAT KHAN ROLL NO 452201088, AMJAD AKHTAR S/O MR ALAM SHAH ROLL NO 451701238, MR SADDAM HUSSAIN S/O MR SARTAJ KHAN ROLL NO 452101177 AND MR SAJJAD AHMAD S/O MR SHER BAHADAR ROLL NO 452101058 UC PIR SADDI IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

No-----288-----

Date-----5/8/2016-----

Committee Members

1; Mr Arshad Hussain (Chairman)

Principal GHS Babuzai Katlang Mardan

2; Mr Abdul Khaliq (Member)

ASDEO Sher Ghar Jalala Mardan

Dates of Enquiry

21/06/2016

01/07/2016

06/07/2016

10/07/2016

28/07/2016

A large, stylized handwritten signature in black ink is written across the bottom of the page. To the right of the signature, there is a vertical line and a horizontal line, possibly indicating a stamp or a specific mark.

4

Venue of Enquiry

- 1; GHS Janga Mardan
- 2; DEO Male office Mardan
- 3; Village Pir Saddi Mardan
- 4; DEO Male office Mardan
- 5; ADSEO Sher ghar Jalala.

Subject

Enquiry against the above candidates in connection with the impersonation case in the NTS Test for the post of PST in Elementary and Secondary Education Mardan KPK.

Introduction

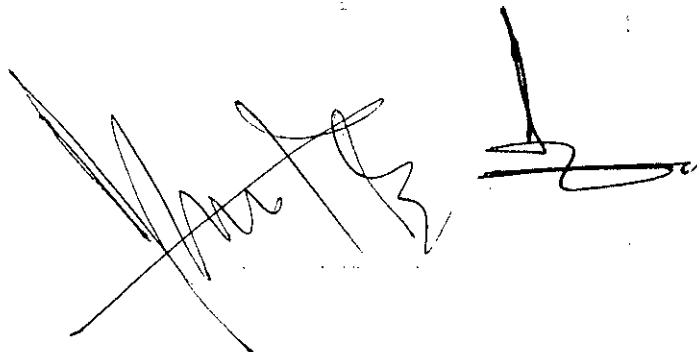
According to the DEO Male Mardan Notification No 4488 Dated 04/06/2016 a committee was constituted to find out the ground realities about the impersonation case in the examination of NTS against the above candidates belong to Union council Pir Saddi Tehsil Takht Bhai Mardan.

Brief History

An application against the above candidates was filed by some candidates in the office of DEO Male E/S Mardan and complained that

The following candidates

1. Mr. Iftikhar Ali S/O Mr Shaukat Ali Khan Union Council Pir Saddi

The bottom of the page features several handwritten signatures and stamps. On the left, there is a faint, circular official stamp. To its right, there are two distinct handwritten signatures in black ink. The first signature is a complex, cursive scribble, while the second is a more stylized, horizontal signature. The overall appearance is that of a formal document with multiple approvals or signatures.

5

1. Mirajul Haq S/O Mr Shah Nazar Khan Union council Pir Saddi

3. Shakirullah S/O Inayat Khan Union council Pir Saddi

4. Saeed Muhammad S/O Pir Muhammad union council Pir Saddi

5. Mushtaq Ahmad S/O Sher Bahadar U.C Pir Saddi

6. Zakirullah S/O Alam Zeb U.C Pir Saddi

7. Gouhar Shah S/O Niamat Khan U.C Pir Saddi

8. Amjad Akhtar S/O Alam Shah U.C Pir Sddi

9. Saddam Hussain S/O Sartaj Khan U.C Pir Saddi

10. Sajjad Ahmad S/O Sher Muhammad U.C Pir Saddi

Had applied for PST through NTS in the month of November 2015 but in the tests of NTS they have not appeared by themselves and some other people have taken the test for them as impersonators.

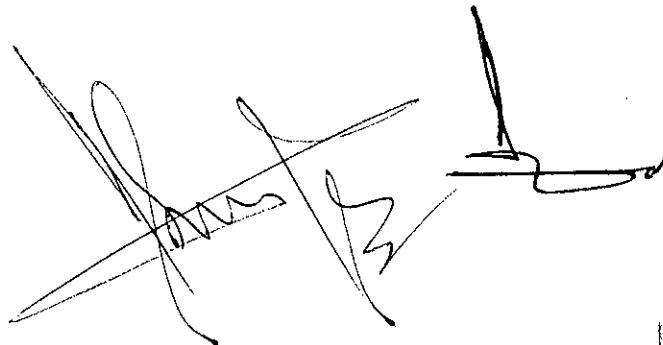
The DEO Male E/S Mardan constituted an enquiry committee comprising Mr Arshad Hussain Principal GHS Babuzai Katlang Mardan and MR Abdul Khaliq ADEO Shergar Circle.

Procedures adopted

The committee met in the DEO office and decided to summon the above candidates to GHS Janga Mardan for an interview and investigation. All the above candidates were issued letters and also informed through mobile phones to attend the above school along with their original documents, attested photographs and original CNIC on 22/06/2016.

Findings

All the above candidates attended GHS Janga personally at 09 am on 22/06/2016. They were given questionnaires to be answered and checked all their documents, CNIC and photos and also judged their specimen signatures and the signatures provided by the NTS and signature in the NTS form. According to our knowledge and investigation we found the following facts about the candidates discussed as under.



cutting attestation

8

452501174

2872499-5

1. Mr Iftikhar Ali S/O Mr Shaukat Ali Khan Roll No ~~452201154~~ CNIC No 16102-~~3242527-5~~ U/C Pir Saddi had applied for the post of PST through NTS and had taken the test in the month of November 2015 and has been appointed as PST at GPS Pir Saddi No 1 Takht Bhai .His photograph had not been received from NTS at the time of his interview. So we requested to NTS to provide his video and after some days we found his video sent by the NTS Organization. He gave us written statement that he had taken the test himself but when we compared it with his real photo and through other reliable sources we came to know that he had not taken the test himself .At the time of submission his NTS form he had fixed a photo of another person named Rasheed Khan S/O Misal Khan village Pir Saddi on his own CNIC and had drawn Photostat .For authenticity we received photo copy of the CNIC of Mr Rasheed Khan which has been expired on 30/06/2015. The picture of both in the CNIC and the picture fixed on the NTS form of Iftikhar Ali are the same. In 2015 Mr Rasheed has renewed his CNIC on which the picture is of the impersonator who has taken the test for Mr Iftikhar Ali. It means that The picture taken during the test is of Mr Rasheed Khan S/O Misal Khan CNIC No 16102-0541588-9 who is serving in education department against PST post at GPS Sharif Malak Killi.

We got the mobile number of Rasheed Khan with the help of community members and called him to join us in the Office of DEO Male Mardan on 28/07/2016 along with original CNIC. He attended DEO office but had no CNIC and offered his original service card on which the same picture was fixed which had been fixed on the photo copy of Mr Iftikhar CNIC sent to NTS for test. We asked Mr Rasheed about the same pictures which he declared as the error of the NTS/Education department. We asked him to give us the photo copy of his service card but he did not honour. He also gave his written statement that he is not involved in this case and did not know the impersonator. However through our strenuous efforts it is clear that the impostor is Mr Rasheed Khan S/O Misal Khan village Khnjaryan pir saddi.

2. MR Mirajul Haq S/O Shah Nazar Khan U/C Pir Saddi Roll No 452201314 CNIC No 16102-9939053-1 is supposed to have taken the test on 29 th November 2015 at Ansi Degree College Mardan center and has been appointed against PST post at GPS Gul MIR KILLI Circle Sher Ghar . According to his verbal statement he had filled his admission form himself. When we compared his picture with the photo provided by NTS both were quite different from each other and after a deep investigation we found out that the impersonator was the same person Mr Rasheed Khan S/O Misal Khan village Pir Saddi who was also the impersonator in the case of Mr Iftikhar Ali. It means that Mr Rsheed Khan is a professional impersonator and has taken the test for both the candidates on different days.

3.The remaining eight candidates i.e Mr Shakerullah S/O Anayat Khan PST GPS Pir Saddi No 2, Saeed Muhammad S/O Pir Muhammad PST GPS Mishkar , Mushtaq Ahmad S/O Sher Bafhadar PST GPS Latif Abad Sherghar , Zakirullah S/O Alam Zeb PST GPS Qadar Shah Killi,

[Handwritten signatures]

Gouhar Shah S/O Niamat Khan PST GPS No 1 Pir Saddi , Amjad Akhtar S/O Alam Shah PST GPS Sharif Malak Killi, Saddam Hussain S/O Sartaj Khan PST GPS Latif Abad Sherghar and Sajjad Ahmad S/O Sher Bahadar PST GPS UC Pir Saddi were personally interviewed and examined their all relevant documents, pictures and attendance sheets provided by the NTS Organization. We found no proofs and indications to debar them from their services against the

It was a herculean task but by the grace of Almighty Allah We conducted the enquiry with our full devotion and honesty though we have been contacted by many renowned and the persons in ranks to write in the favour of guilty candidates and impersonators so as to prevent them from legal action against them and were threatened through different unknown vulgar and rogue yet being patriotic and loyal to our state we completed our mission with courage without any nepotism in the best interest of the public.

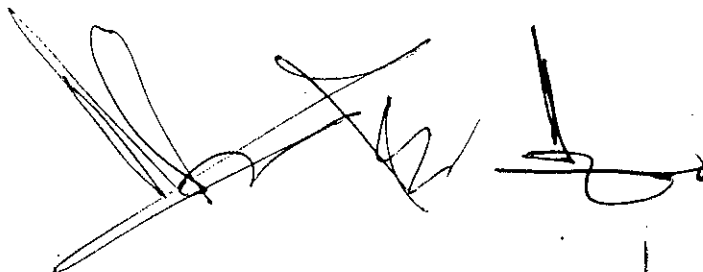
Conclusion

In the light of above findings it is concluded that

1. The case of MR Iftikhar Ali S/O Shaukat Ali UC Pirsaddi is clearly impersonation and the impersonator is Mr Rasheed Khan S/O Misal Khan U.C Pir Saddi (a professional impersonator)
2. The case of Mr Mirajul Haq S/O Shah Nazar Khan U.C Pir Saddi is crystal clear impersonation and the impersonator is the same person Mr Rasheed Khan S/O Misal Khan U.C Pir Saddi serving against PST post at GPS Sharif Malik
3. The remaining eight cases are clear and no suspicions were found to prove the cases as impersonation.

Recommendations

1. Both the teachers i.e Mr Iftikhar Ali S/O MR Shaukat Ali U.C Pir Saddi and MR Mirajul nHaq S/O Mr Shah Nazar Khan U.C Pir Saddi may be dealt according to the law and next deserving candidates be given a chance for appointment as per policy.
2. Mr Rasheed Khan S/O Misal Khan PST GPS Sharif Malak Killi CNIC No 16102-0541588-9 may please be treated according to the existing policy and be handed over to law enforcing agencies.



3. The cases of other eight cited teachers may please be honored and encouraged to continue their services on their posts.
4. The NTS Organization may please be requested to introduce bio-metric system .
5. Thumb impression should be made compulsory on the answer sheet as well as in the attendance sheet during the test and videos of the successful candidates of the merit list be sent to the concerned institutions and through special committees the deserving candidates be recommended for appointment.
6. NTS Organization may please be directed to depute expert teachers selected from Government educational institutions and not persons taken from the street.

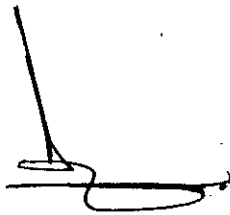
Enclosures

1. Original NTS form for admission of all the above candidates.
2. Replies of the given Questionnaires of all the above candidates And their statements.
3. Photographs of all the candidates provided to us by them.
4. Videos of all the candidates' attendance sheets during the test provided by the NTS.

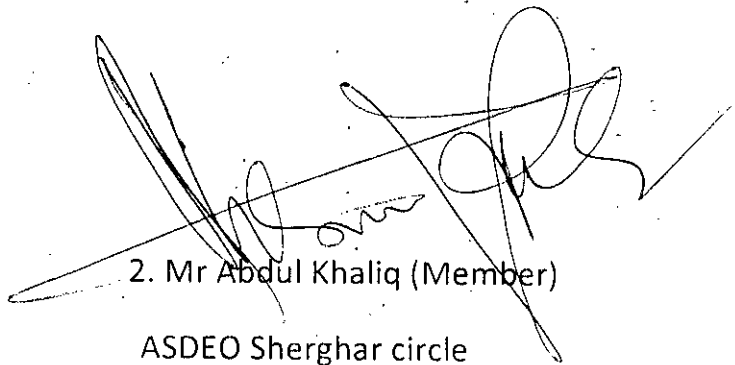
THE END

this enquiry report contains 08 pages and each has been signed by us.

Enquiry Officers



1. Mr Arshad Hussain (Chairman)
Principal GHS Babuzai Katlan Mardan



2. Mr Abdul Khaliq (Member)
ASDEO Sherghar circle

**Government of the Khyber Pakhtunkhwa
Elementary and Secondary
Education Department**

Screening Test for PST (BPS-12)

G-5



Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/
Diploma in Education from a recognized Institute; or
Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in
Education from a recognized University
Age Limit: 18-35 Years

اس فارم کا اطلاق صرف مذکورہ بالا آسامی کیلئے ہوگا۔ ایک سے زیادہ آسامیوں کے لئے دیگر درخواست فارم علیحدہ فیس کے ساتھ ارسال کریں

Eligibility Criteria:

A. Is your age according to the prescribed age limit for the desired Post as on 28-08-2015?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B. Is your Result Not Awaited? (Result declared before last date of apply.)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C. Do you have relevant / prescribed Qualification & Experience as mentioned in Advertisement?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If your reply is "Yes" to A, B & C above, only then please proceed further. Otherwise you are not eligible to apply.

01. Bank Online Deposit of Rs: 800/- from Designated Bank Branches. (For Only 5 Schools)

Bank Code	Deposit Date
-----------	--------------

*Note: Application Form will not be entertained without Original Deposit Slip (NTS Copy)

02. Desired Test City: Fill Only One Box (Mandatory)

Subject to a minimum of 200 candidates, otherwise the candidates will be assigned next nearest test city.

01. <input type="checkbox"/> Abbottabad	02. <input type="checkbox"/> Bannu	03. <input type="checkbox"/> Battagram	04. <input type="checkbox"/> Buner
05. <input type="checkbox"/> Charsadda	06. <input type="checkbox"/> Chitral	07. <input type="checkbox"/> Dera Ismail Khan	08. <input type="checkbox"/> Hangu
09. <input type="checkbox"/> Haripur	10. <input type="checkbox"/> Karak	11. <input type="checkbox"/> Kohat	12. <input type="checkbox"/> Kohistan
13. <input type="checkbox"/> Lakkhi Marwat	14. <input type="checkbox"/> Lower Dir	15. <input type="checkbox"/> Malakand	16. <input type="checkbox"/> Mansehra
17. <input checked="" type="checkbox"/> Mardan	18. <input type="checkbox"/> Nowshera	19. <input type="checkbox"/> Peshawar	20. <input type="checkbox"/> Shangla
21. <input type="checkbox"/> Swabi	22. <input type="checkbox"/> Swat	23. <input type="checkbox"/> Tank	24. <input type="checkbox"/> Tor Ghar
25. <input type="checkbox"/> Upper Dir			

Personal Information: Use CAPITAL letters and leave spaces between words.

03. Name in Full: IFTIKHAR-ALI	
04. Father's Name: SHAWKAT-ALI	
05. Candidate CNIC #: Write your own CNIC No. Or B Form No. 16102-2872499-5	
06. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	07. Date of Birth: Write your Correct Date of Birth otherwise you will be rejected. 02-02-1987
08. Postal Address: VILLAGE KHAT KALAY P/O QUTAB GARH TEHSIL TAKHT BHAI City: MARDAN	

Rasheed Khan s/o Misal Khan
Pirsaddi.

Very very suspicious.

[Handwritten signature]

Phone No: (OFF) _____ (RES.) _____ (Mobile) 0345-9291730
 Mandatory (Candidates who are not having their own network sim (Ported Networks) will not receive sms from NTS)

Are you a Government Servant?
 If Yes, please attach NOC

Yes No

If Yes then total years of continuous experience: _____

Are you a Disabled Person?
 please attach Disability Certificate

Yes No

If yes, state nature of your disability: _____

Religion:

Muslim Non Muslim

If Non Muslim, Please Specify: _____

Registration Council: P I R S A D D I

District of Domicile: Fill Only One Box (Mandatory)

<input type="checkbox"/> 01. Abbottabad	<input type="checkbox"/> 02. Bannu	<input type="checkbox"/> 03. Battagram	<input type="checkbox"/> 04. Buner
<input type="checkbox"/> 05. Charsadda	<input type="checkbox"/> 06. Chitral	<input type="checkbox"/> 07. Dera Ismail Khan	<input type="checkbox"/> 08. Hangu
<input type="checkbox"/> 09. Haripur	<input type="checkbox"/> 10. Karak	<input type="checkbox"/> 11. Kohat	<input type="checkbox"/> 12. Kohistan
<input type="checkbox"/> 13. Lalki Marwat	<input type="checkbox"/> 14. Lower Dir	<input type="checkbox"/> 15. Malakand	<input type="checkbox"/> 16. Mansehra
<input checked="" type="checkbox"/> 17. Mardan	<input type="checkbox"/> 18. Nowshera	<input type="checkbox"/> 19. Peshawar	<input type="checkbox"/> 20. Shangla
<input type="checkbox"/> 21. Swabi	<input type="checkbox"/> 22. Swat	<input type="checkbox"/> 23. Tank	<input type="checkbox"/> 24. Tor Ghar
<input type="checkbox"/> 25. Upper Dir			

15. Academic Information: (Please do not attach attested copies of your academic certificates at this stage)

- NTS will not issue Roll No Slips to those who have not filled in their academic record properly.
- Candidate should convert their grades into marks. (O Level/A Level or any other degree having grade) (O Level/A Level) (O Level/A Level)
- Write exact degree name & major subject mention in certificate/transcript.

Certificate / Degree Name	Degree Title	Specialization / Major Subject	Year Passing	Obtained Marks / CGPA	Total Marks / CGPA	Board / University
Metric (10 Years)	SSC	E-U, PS, IS, Pa 15 st. GSC, M	2003 (A)	558	850	BISE Malakand
Intermediate (12 Years)	D-Com	Accounting	2005 (A)	826	1400	BTE Peshawar
Bachelor (14 Years)	B-Com	Accounting	2008 (A)	668	1400	University of Peshawar
Master (16 Years)	M-Com	Accounting	2012 (A)	321	700	University of Peshawar
NOTE: In case of Honors Degree calculate your marks As 14 years (first 2 years) and 16 years (last 2 years) & write in the relevant column.						
Bachelor (Hons) (16 Years)	B-Com Hons	Accounting	2009 A	367	700	University of Peshawar
MS / M. Phil / Ph.D (18 Years)						

16. Professional Qualification:

Certificate / Diploma	Certificate Name	Year Passing	Obtained Marks	Total Marks	Board / University
Relevant Diploma / Certificate / Degree	PTC	2010	611	900	I-Q-U-U. Islam Abad
M.Ed / M.A Education	<input type="checkbox"/> M.Ed <input type="checkbox"/> M.A Education				

School Code and Name Preferences:

(Mandatory) Forms without properly filled School Codes will be rejected

Please write accurate codes for the required school.

See list of schools with codes at NTS website (www.nts.org.pk).

برائے مہربانی ایسے مطلوبہ سکول سے متعلق صحیح کوڈ کو اندراج کریں۔

سکول اور متعلقہ کوڈز NTS ویب سائٹ (www.nts.org.pk) پر ملاحظہ کریں۔

#	School Code	District	School Name
1.	281293	Mardan	GPS Latif Abad
2.	281296	Mardan	GPS Pirsaddi No1
3.	281298	Mardan	GPS Sharif Malak Kaly
4.	281299	Mardan	GPS Gul mix Kaly
5.	281292	Mardan	GPS Gul Ahmad Kaly

Undertaking By The Applicant:

Lifikha Ali d/s/w of Shaukat Ali do hereby solemnly declare and affirm that I have read and understood the instructions and conditions for appearing in the NTS Test, and I have filled-up the application form as per instructions given below. In case of any information contained herein is found at any stage to be missing, untrue, false or forged, my candidature can be canceled at any stage (even after employment, if so revealed later), and I shall be liable to legal action.

Date: 22-8-2015

Signature of the Candidate

Ali Khan**Picture 2**

Affix your recent
passport size color
photograph
with Stapler

تصویر لازماً منسلک کریں بصورت
رفارم عمل میں نہیں لایا جائیگا۔

Check List Provide the following documents other wise Application Form will not be entertained

- Original Bank Deposit Slip (NTS Copy)
- 2 Passport size color photograph to be attached in the picture box area on page (1 & 3)
- Copy of CNIC

General Instructions / Information:

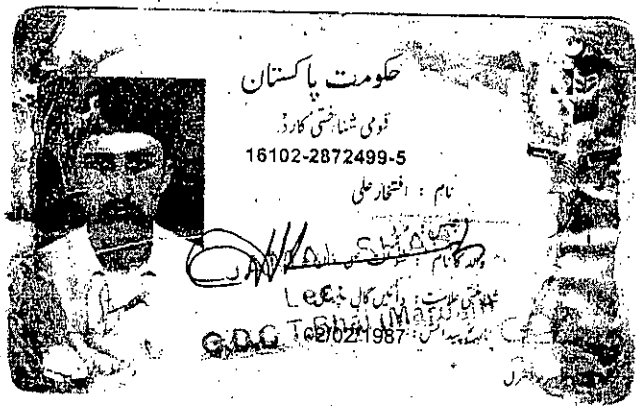
- > By Hand submission of Application Form is not allowed.
- > Mobile Phones are not allowed in Test Center premises.
- > Use separate envelop and separate application form for each post you are applying for.
- > **Last date for submission of application form is Friday 28th August, 2015.**
- > **Applications received on or after Saturday 29th August, 2015 will be rejected.**
- > Application should reach NTS office latest by last date of submission of Application Form.
- > NTS will not be responsible for late receiving of application through courier / Pakistan Post etc.

HELP LINE:

UAN : +92-51-844-444-1
Website: www.nts.org.pk

Please Send Application Forms to:

ESED KP (Project)
National Testing Service
1-E, Street No. 46, Sector I-8/2,
Islamabad.



National Testing Service-Pakistan
Providing Assessment in Education and Professional Testing

NTS COPY

**Elementary and Secondary
 Education Department**

Unique ID: _____ Date: 21-08-2015
 Branch Code: 1957 Branch Name: HBL Jalal

ONLINE DEPOSIT SLIP
(* Please deposit fee in only one bank & tick the relevant bank)

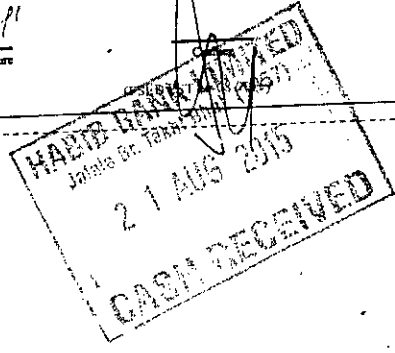
<input checked="" type="checkbox"/> Allied Bank Limited <small>Formerly Allied Bank of Pakistan (Limited)</small> Branch: <u>I-8 Markaz Branch Islamabad (0140947)</u> A/C No: <u>NTS-Pakistan Collection 0610008125640018</u> Note: Bank Service Charges Free of Cost	<input checked="" type="checkbox"/> Commercial Bank Branch: <u>I-8 Markaz Branch, Islamabad (1501)</u> A/C No: <u>NTS-Pakistan 647943831003775</u> Note: Bank Service Charges Free of Cost
<input checked="" type="checkbox"/> UBL UNITED BANK Branch: <u>Canal Br Kashmir Road Rawalpindi (0041)</u> A/C No: <u>NTS-Pakistan 217767828</u> Note: Bank Service Charges Free of Cost	<input checked="" type="checkbox"/> HABIB BANK LTD <small>THE POWER TO SERVE</small> Branch: <u>H9 Shalimar Recording Co-15B (1742)</u> A/C No: <u>NTS-Pakistan 17427900464503</u> Note: Bank Service Charges Free of Cost

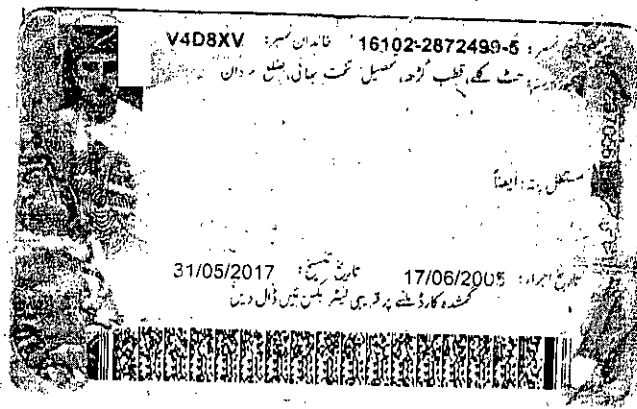
*Note: Desired Bank Stamp is required on the Deposit Slip & Send Original Deposit Slip (NTS Copy) along Application Form to NTS Office
 Application Form will not be entertained without Original Deposit Slip (NTS Cop

Applicant's Name: Mukhtyar Ali
 Father Name: SHAWKAT ALI
 CNIC No: 16102-2872499-5
 B Form No: _____

Amount Rs: 800/- Amount in word: Eight Hundred Rupees Only
Non Refundable Non Transferable

Applicant Signature: _____ Officer: _____





V4D8XV 16/02-2872499-5

مجلس کارکنان

مستقل رہنما

31/05/2017 17/06/2005

مجلس کارکنان



افتخار علی ولد شوکت علی تاریخ پیدائش ۱۵۷۷
 مستقل پتہ ڈاک خانہ وقادین قلعہ گڑھ تحصیل تخت بھائی ضلع مردان
 عارضی پتہ: ایفنا،



۱۔۔۔ لقیہی قابلیت :-
 میٹرک ملائند بورڈ سے
 D.Com نیاور بورڈ سے
 B.Com نیاور یونیورسٹی سے
 M.Com نیاور یونیورسٹی سے
 P.St علامہ اقبال اوپن یونیورسٹی سے

Pst
 ۱۵۷۷

سوال نمبر 3 جواب 1۔ میں نے 'NTS' ٹیسٹ اس رد لیمنز پر دیا تھا 452501174

امتیازی حال :-
 ANSI Degree college, opposite Mardan Medical
 Camps, Mardan.

سوال نمبر 4 جواب 2۔ میں Pst کالٹ خود NTS میں خود دیا ہے۔

سوال نمبر 5 جواب 3۔ فی الحال میں صرف Pst پوسٹ پر ہوں۔

سوال نمبر 6 جواب 4۔ ہاں میرا پوسٹنگ Pst پر ہو چکا ہے۔

سوال نمبر 7 جواب 5۔ میرا تعلق پھر سرور یونین کونسل سے ہے۔

سوال نمبر 8 جواب 6۔
 سٹو 1
 سٹو 2
 سٹو 3

سوال نمبر 9 جواب 7۔ میں نے NTS امتحان خود دیا تھا اور میرے مطالبہ مری
 لقیہی ہو چکا ہے۔

سوال نمبر 10 جواب 8۔ 0345-9291730

Requirements: ① Attendance and ~~redo~~



حکومت پاکستان

قومی شناختی کارڈ

16102-0541588-9

نام: آر شہید خان

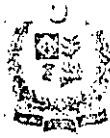
پیس: مرد

والد کا نام: شمل خان

شناختی ماہیت: کان کے نمبر

15/08/88

LECTURER
Govt Degree College
Tukli Bhai (Mardan)



Handwritten signature or mark in a circle.

رستورمانل کارڈ



شماره: 9-16102-0541588-1 خانہ نامہ نمبر: T1M7DQ

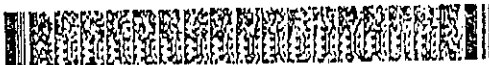
موجودہ پتہ: قشمبریان، ڈاکخانہ پیر مری، تحصیل شکرگڑھ، ضلع میانوالی، سندھ



سنگل پتہ ایسا

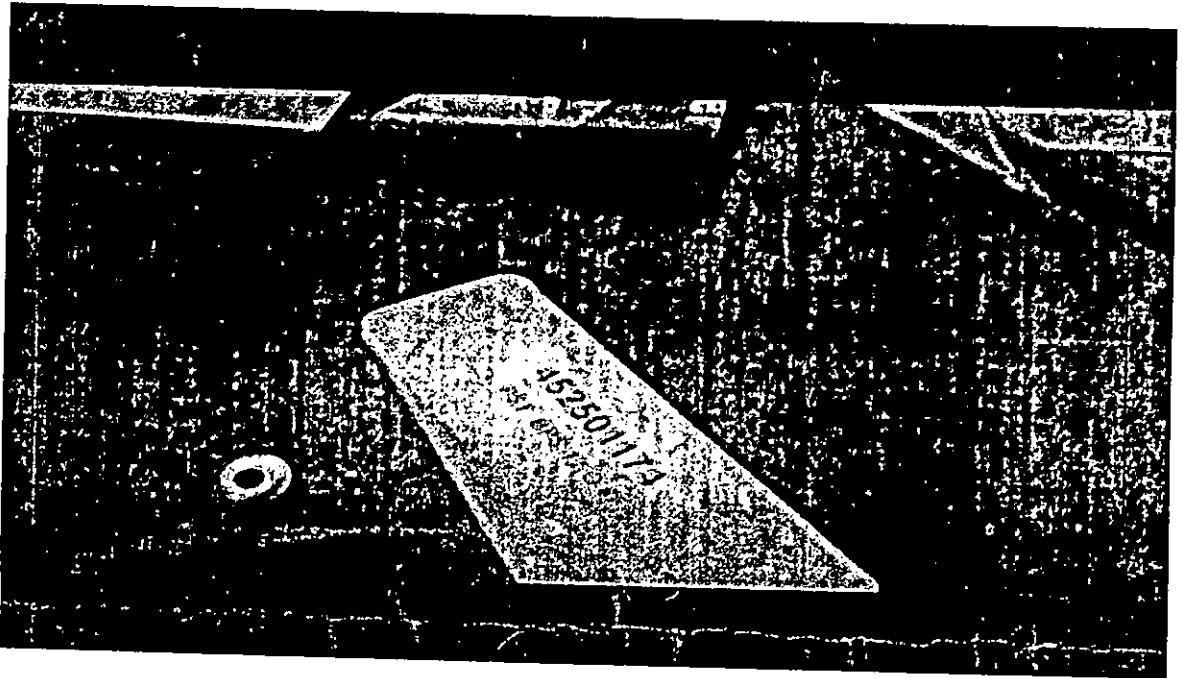
تاریخ اجراء: 12/07/2003 تاریخ ترمیم: 30/06/2015

کھدہ کارڈ ملنے پر قریبی ایئر بس میں ڈال دین



12064029129

Jiikhay Ali
D s/o Shaukat Ali Khan.



[Handwritten signature]

Annex 'E'



حکومت پاکستان

1011-9055-1



وزارت خزانہ

ادارہ کاروبار بین الاقوامی

شاخہ کاروبار بین الاقوامی

کھوارق - ایف

آئی ڈی این

دستخط کارکن

NTS National Testing Service-Pakistan

NTS-Pakistan

Registration and Accreditation
Federal Govt. Department

Unique ID: _____ Date: 18-08-2015

Branch Code: 1188 Branch Name: UBL

ONLINE DEPOSIT SLIP

<input checked="" type="checkbox"/> Allied Bank Limited	<input type="checkbox"/>
Branch: <u>1-8 Markaz Branch Islamabad (0169947)</u>	Branch: <u>1-51 Markaz Branch, Islamabad (11501)</u>
City: <u>NTS-Pakistan Collection</u> No: <u>00100042354901A</u>	City: <u>NTS-Pakistan</u> No: <u>6479033100377A</u>
Note: Bank Service Charges Free of Cost	Note: Bank Service Charges Free of Cost

<input checked="" type="checkbox"/> UNITEC BANK	<input type="checkbox"/> HABIB BANK
Branch: <u>Cent Br Kashmir Road Rawalpindi (0041)</u>	Branch: <u>119 Shalimar Road Rawalpindi Co ISB (1742)</u>
City: <u>NTS-Pakistan</u> No: <u>21776782K</u>	City: <u>NTS-Pakistan</u> No: <u>17427800464503</u>
Note: Bank Service Charges Free of Cost	Note: Bank Service Charges Free of Cost

Note: Please Bank Stamp is required on the Deposit Slip & Bank Deposit Slip (NTS Copy) along Application Form to NTS Office.

Application Form will not be entertained without Original Bank Slip & NTS Copy.

Applicant's Name: Miraj-ul-haq
 Father Name: Shah Nazam Khan
 CNIC No: 16102-9939053-1

Amount Rs: 800/- Amount in word: Eight Hundred Rupees Only

NTS-Pakistan
Applicant Signature

[Handwritten Signature]
800
1188

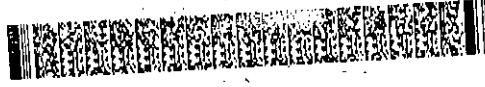
Other



شماره شناختی: 15102-9939053-1
نام خانوادگی: محمد امجد
مقام: مہاجرین کے لیے امور اور رہائش کے لیے امور
مقام: مہاجرین کے لیے امور اور رہائش کے لیے امور

مستقل رہنے: ایسا

تاریخ: 25/10/2013
تاریخ: 25/10/2023
مقام: مہاجرین کے لیے امور اور رہائش کے لیے امور



**Government of the Khyber Pakhtunkhwa
Elementary and Secondary
Education Department**

NTS

Screening Test for PST (BPS-12)



Intermediate or equivalent qualification from a recognized Board with a First or Second Division or
Diploma in Education from a recognized Institute or
Secondary School Certificate from a recognized Board in second Division or a degree in Education from a
University or a recognized University.
Age Limit: 18-35 Years

Eligibility Criteria:

A. Is your age according to the prescribed age limit for the desired Post as on 28-08-2015?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B. Is your Result Not Awaited? (Result declared before last date of apply.)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C. Do you have relevant / prescribed Qualification & Experience as mentioned in Advertisement?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If your reply is "Yes" to A, B & C above, only then please proceed further. Otherwise you are not eligible to apply.

01. Bank Online Deposit of Rs: 800/- from Designated Bank Branches.

Bank Code	UBLT Bhai 1188	Deposit Date	18-08-2015
-----------	----------------	--------------	------------

02. Desired Test City: Fill Only One Box. Subject to a minimum of 200 candidates, otherwise the candidates will be assigned next nearest test city.

01. <input type="checkbox"/> Abbottabad	02. <input type="checkbox"/> Bannu	03. <input type="checkbox"/> Battagram	04. <input type="checkbox"/> Buner
05. <input type="checkbox"/> Charsadda	06. <input type="checkbox"/> Chitral	07. <input type="checkbox"/> Dera Ismail Khan	08. <input type="checkbox"/> Hangu
09. <input type="checkbox"/> Haripur	10. <input type="checkbox"/> Karak	11. <input type="checkbox"/> Kohat	12. <input type="checkbox"/> Kohistan
13. <input type="checkbox"/> Lakki Marwat	14. <input type="checkbox"/> Lower Dir	15. <input type="checkbox"/> Malakand	16. <input type="checkbox"/> Mansehra
17. <input checked="" type="checkbox"/> Mardan	18. <input type="checkbox"/> Nowshera	19. <input type="checkbox"/> Peshawar	20. <input type="checkbox"/> Shangla
21. <input type="checkbox"/> Swabi	22. <input type="checkbox"/> Swat	23. <input type="checkbox"/> Tank	24. <input type="checkbox"/> Tor Ghar
25. <input type="checkbox"/> Upper Dir			

Personal Information: Use CAPITAL letters and leave spaces between words.

03. Name in Full: M I R A J U L - H A Q

04. Father's Name: S H A H - M A Z I R - K H A N

05. Candidate CNIC #: _____
Write your own CNIC No. Or B Form No.

06. Gender: Male Female

07. Date of Birth: Write your Correct Date of Birth otherwise you will be rejected
D D M M Y Y: 2 5 - 0 7 - 1 9 8 6

08. Postal Address: village - Gujranakalkey P/O Pirsaddi Teh. Takht Bahi
Dust Mardan City: Mardan.

All correspondence will be made on this address through courier service or ordinary postal service.



Rasheed Khan
S/o Misal Khan
Pir Saddi

~~incorrec~~
person Khan

09. Phone No: (OFF) 0300-5776137 (RES.)

(Mobile) 0313-1418958

10. Are you a Government Servant?
In case of Yes, please attach NOC

Yes No

If Yes then total years of continuous experience: _____

11. Are you a Disabled Person?
If yes, please attach relevant documents

Yes No

If yes, state nature of your disability: _____

12. Religion:

Muslim Non Muslim

If Non Muslim, Please Specify: _____

13. Union Council:

PIR-SADDI

14. District of Domicile: Fill Only One Box

01. <input type="checkbox"/> Abbottabad	02. <input type="checkbox"/> Bannu	03. <input type="checkbox"/> Battagram	04. <input type="checkbox"/> Buner
05. <input type="checkbox"/> Charsadda	06. <input type="checkbox"/> Chitral	07. <input type="checkbox"/> Dera Ismail Khan	08. <input type="checkbox"/> Hangu
09. <input type="checkbox"/> Haripur	10. <input type="checkbox"/> Karak	11. <input type="checkbox"/> Kohat	12. <input type="checkbox"/> Kohistan
13. <input type="checkbox"/> Lakki Marwat	14. <input type="checkbox"/> Lower Dir	15. <input type="checkbox"/> Malakand	16. <input type="checkbox"/> Manshera
17. <input checked="" type="checkbox"/> Mardan	18. <input type="checkbox"/> Nowshera	19. <input type="checkbox"/> Peshawar	20. <input type="checkbox"/> Shangla
21. <input type="checkbox"/> Swabi	22. <input type="checkbox"/> Swat	23. <input type="checkbox"/> Tank	24. <input type="checkbox"/> Tor Ghar
25. <input type="checkbox"/> Upper Dir			

15. Academic Information: (Please do not attach attested copies of your academic certificates at this stage)

INTS is not responsible for the loss of data if there is any error in their academic records program.
 عینیت انسٹریوٹس کنسلٹنٹس (پرائیویٹ) لمیٹڈ کے ذریعے اس سافٹ ویئر کی مدد سے آپ کی تعلیمی ریکارڈز کو محفوظ بنایا گیا ہے۔
 اس سافٹ ویئر کی مدد سے آپ کی تعلیمی ریکارڈز کو محفوظ بنایا گیا ہے۔
 عینیت انسٹریوٹس کنسلٹنٹس (پرائیویٹ) لمیٹڈ کے ذریعے اس سافٹ ویئر کی مدد سے آپ کی تعلیمی ریکارڈز کو محفوظ بنایا گیا ہے۔

Certificate / Degree Name	Degree Title	Specialization / Major Subject	Year Passing	Obtained Marks / CGPA	Total Marks / CGPA	Board / University
Metric (10 Years)	SSC	Arts	2002	518	850	Peshawar
Intermediate (12 Years)	F.A	Arts	2004	690	1100	Mardan
Bachelor (14 Years)	B.A	"	2006	279	550	Peshawar
Master (16 Years)	MBA	Finance	2012	1846	2400	AIKATUM
Bachelor (Hons) (16 Years)				Obtained Marks (Year 1 + Year 2)	Total Marks (Year 1 + Year 2)	
MS / M. Phil / Ph.D (18 Years)				Obtained Marks (Year 3 + Year 4)	Total Marks (Year 3 + Year 4)	

16. Professional Qualification:

Certificate / Diploma	Certificate Name	Year Passing	Obtained Marks	Total Marks	Board / University
Relevant Diploma / Certificate / Degree	PTC	2007	632	900	open university Allama-ibrahim
M.Ed / M.A Education	<input type="checkbox"/> M.Ed <input type="checkbox"/> M.A Education				

17. School Code and Name Preferences: (Mandatory) Forms without properly filled School Codes will be rejected.

Please write accurate codes for the required school.

See list of schools with codes at NTS website (www.nts.org.pk)

برائے سرکاری اسکول سے متعلقہ کڈ کوڈ فراہم کریں۔
 سکول اور علاقہ کوڈز (www.nts.org.pk) اور بوائے (www.nts.org.pk) پر ملاحظہ کریں۔

Sr. #	School Code	District	School Name
1.	281292	Marelan	G.P.S. Gul. Ahmad. Kallay.
2.	281293	Marelan	G.P.S. - Latif Khan Abad Kally.
3.	281295	"	G.P.S. - 1/0-2. Pirsaddi
4.	281298	"	G.P.S. - 1/0-2 Pirsaddi
5.	281299	"	G.P.S. - Gul Mir Kallay.

Undertaking By The Applicant:

I Miraj-uli haq d/s/w of Shah-Arayer do hereby solemnly declare and affirm that I have read and understood the instructions and conditions for appearing in the NTS Test, and I have filled-up the application form as per instructions given below. In case of any information contained herein is found at any stage to be missing, untrue, false or forged, my candidature can be canceled at any stage (even after employment, if so revealed later), and I shall be liable to legal action.

Affix your recent passport size color photograph

لازمی طور پر پاسپورٹ سائز کا رنگین تصویر لگا کر نام پل میں نہیں لایا جائیگا۔

Date: 18-08-2015

Signature of the Candidate Miraj

Check List Provide the following documents other wise Application Form will not be entertained

- Original Bank Deposit Slip (NTS Copy)
- 2 Passports size color photograph to be attached to the picture has area on page 1 & 2.
- Copy of CNIC

General Instructions / Information:

- By Hand submission of Application Form is not allowed.
- Mobile Phones are not allowed in Test Center premises.
- Use separate envelop and separate application form for each post you are applying for.
- **Last date for submission of application form is Friday 28th August, 2015.**
- **Applications received on or after Saturday 29th August, 2015 will be rejected.**
- Application should reach NTS office latest by last date of submission of Application Form.
- NTS will not be responsible for late receiving of application through courier / Pakistan Post etc.

HELP LINE:

UAN : +92-51-844-444-1
 Website : www.nts.org.pk

Please Send Application Forms to:

ESED KP (Project)
 National Testing Service
 1-E, Street No. 46, Sector I-8/2,
 Islamabad.





NATIONAL TESTING SERVICE PAKISTAN

Attendance Sheet Candidates

Page 48 of 48

4582-MARDAN

22-PST BPS-12(G-3)

Batch-8 (09:00 AM)

ESED KPK TEST 2015

Sunday 29th November, 2015

Invigilator Name AMAN KHAN Supervisor Name M. ISLAM

Sr.#	Roll #	Candidate Name	Candidate Signature
1	452201306	JAWAD ALI	
2	452201307	SHAH HUSSAIN	
3	452201308	SHER ALAM	
4	452201309	SHAHID ALI	
5	452201310	MEER AZAM KHAN	
6	452201311	FATEH KHAN	
7	452201312	ABDUL WALI KHAN	
8	452201313	SHAH FAISAL	
9	452201314	MIRAJ UL HAQ	
10	452201315	NAZIR MUHAMMAD	
11	452201316	SHAH ZEB	
12	452201317	SAJJAD ALI	
13	452201318	MOHAMMAD USMAN FAISAL	
14	452201319	ASAD ULLAH	
15	452201320	ABDULLAH	
ONLY SUPERVISOR			TOTAL PRESENT
1. Mark Absent With Red Pen Only			(15)

Amal Khan
Invigilator Signature

M. Islam
Supervisor Signature

[Signature]
Chief Supervisor Signature



حوالہ نمبر 1 - معراج الحق ولد شاہ لقرخان تاریخ پیدائشی 5-07-1986

حوالہ نمبر 2 - مستقل اور عارضی پست

گناؤں گمراہوں کے علاج ڈاکٹر اور دیگر تفصیلی نکتہ چینی

حوالہ نمبر 3 - تعلیمی قابلیت

from - پشاور بورڈ - P.S.T.
from - Mardan Board - F.A.

from - Peshawer University - B.A.

from - AWKUM-university mardan - M.B.A Finance

from - A.I.O.U - P.T.C.

NTS test: 452201314 اور میں نے NTS رول نمبر - حوالہ نمبر 4

ANSI degree collage opposite side mardan. Medical complex میں دیا تھا -

حوالہ نمبر 5 - میں نے Pst امتحان NTS کا منت خود دیا تھا

حوالہ نمبر 5 - فی الحال میں صرف Pst پوسٹ پر ہوں

حوالہ نمبر 6 - ہاں میرا پوسٹنگ Pst پر موٹی ہے

حوالہ نمبر 7 - میرا تعلق دیگر لوہین کونسل سے ہے

حوالہ نمبر 8 - معراج الحق - معراج الحق
1 2 3

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN

Dated Mardan the 06/08/2016

Annex 'F'

No 5712

SHOW CAUSE NOTICE

I, Siraj Muhammad, District Education Officer (Male) Mardan as a competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule, 2011 do hereby serve you, Mr. Rashid Khan S/O Misal Khan Working against PST Male post at GPS Sharif Malik Killi U.C Pir Saddi District Mardan

1. That the consequent upon the complaints received by the undersigned regarding your alleged impersonation for the appointment against PST Male post in the E&SE Department District Mardan in place of Mr. Iftikhar Ali S/o Mr. Shaukat Ali Khan during the NTS held on 28/11/2015 for U/C Pir Saddi District Mardan
2. That an inquiry committee was constituted to conduct inquiry in the case, after conducting inquiry by the inquiry committee they proved your impersonation and recommended you for major penalty i.e. Removal from Service
3. That you being Civil Servant have committed inefficiency and Misconduct by bringing ill name for the department by impersonating during the said examination, Hence liable to be proceed against under the E&D Rules, 2011.
4. You are, therefore, required to show cause as to why the Major Penalty of Removal from Service should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this notice is received within fourteen (14) 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.

Siraj Muhammad
District Education Officer
(Male) Mardan

Endst No: 5713

Dated: 06-08-2016.

Copy forwarded to:-

1. SDEO (M) Takht Bhal.
2. Mr. Rashid Khan S/O Misal Khan PST GPS Sharif Malik Killi.
3. Head Teacher GPS Sharif Malik Killi.
4. P/File Rashid Khan.

6/8/16
District Education Officer
(Male) Mardan

Final Hearing of Rashid Khan P.S.T, G.P.S

Jehanzeb Malak Willy District Mardan

Dated: 25-10-2016 at 11A.M Annex 4 3

آپ پر الزام ہے کہ آپ احتجاجی وفد سٹوڈنٹ علی 5-27

CNIC No: 161023242 اور معراج الحق ولد شہ نذر خان 1-539939-16102

کی فہرست (N.A.S) Pst میں بیٹھے تھے۔ موجودہ شواہد جو

آپ کے خلاف ہیں اس پر آپ کے خلاف حکمانہ کارروائی ہو سکتی

ہے آپ اپنی ہفتائی میں کیا کہنا چاہتے ہیں۔ جواب دیا

کہ میرے پاس اس ہفتائی کے جواب سے کوئی ثبوت نہیں ہو سکتا

اور تمام الزامات سے میں انکار کرتا ہوں اور مجھ پر ثبوت نہیں

Departmental Representation
MULHAMMAD HAROON

16101-4818092-1

25/10/16
شہ خان ولد مشتاق

آئی بی سی سرگودھا

161012-0541588-9

(Expired on 30-6-2015)

No New I.D card

گواہ نمبر 2
محکمہ اقبال

A.D.O (Primary)

D.E.O (M) Mardan

16102 5712276-7

گواہ نمبر 1
26/10/2016

ماہرہ اقبال

A.D.O Secourary

D.E.O (M) Mardan

16102-48951006-3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

Appellant

Versus

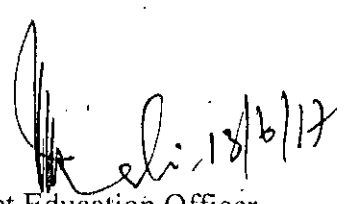
The Secretary Education (E & SE) Peshawar & Others

Respondents

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	04
2.	Copy of Order	A	05	--
3.	Copy of Complaints from ASDEO, Head Master and PTC Chairman.	"B", "BI", "BII"	06	08
7.	Copy of Inquiry Report,	"C"	09	14
8.	Copies of Application Forms of Iftikhar Ali, original CNIC, CCTV Photage	"D"	15	21
9.	Copies of Application Forms of Miraj Ul Haq, CCTV Photage	"E"	22	26
10.	Copy of Show Cause Notice	"F"	27	--
11.	Copy of Personal Hearing	"G"	28	--

Respondents No 1 to 3


District Education Officer
(Male) Mardan

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

Versus

The Secretary Education (E & SE) Peshawar & Others

..... Respondents

Para Wise Comments on Behalf of Respondents No 1 to 3

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action as well as locus standi to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to this Honourable Tribunal with clean hands.
6. That the appellant is estopped by his own conduct.
7. That the appellant has concealed the material facts from this Honourable Tribunal hence liable to be dismissed.
8. That the instant appeal is liable to be dismissed for non-joinder of necessary / mis-joinder of unnecessary parties.
9. That the instant appeal is based on malafide intention, hence liable to be dismissed.
10. That the instant appeal is against the prevailing law and rules.
11. That after fulfillment of all the codal formalities the appellant was removed from Service for the charges of impersonation in the NTS test vide order Endst No 8539-G dated 09-11-2016 in accordance with law. (Copy of Order is attached as **Annex- "A"**)

ON FACT:

1. Para No 1 is incorrect to the extent of his satisfactory duty, as the Appellant was previously removed from service by his ill behaviour toward his duty on continuous complaints made against the appellant from officers and PTC Chairman of the concerned School regarding non performing duty/absenteeism in the school in 2008, while the appellant again fraudulently kept the education department in dark regarding his previous service and joined the education department on 27-03-2012. (Copies of Complaints from ASDEO, Head Master and PTC Chairman are attached as **Annex- "B", "BI", "BII"**)

- 3
2. Para No 2 is correct to the extent of inquiry, as per the inquiry report it was proved that the appellant being professional impersonator, impersonated in NTS test in the name of Iftikhar Ali S/O Shaukat Ali Khan, Miraj ul Haq S/O Shah Nazar Khan has taken the test for both the candidates on different days, the NTS administration was asked to provide the application form and picture of the candidates which clearly shows that the appellant has affixed his own photo on the copy of CNIC and application form of Iftikhar Ali, while the CCTV photage also proves the presence of the appellant in the test. (Copies of Inquiry Report, Application Forms along with CCTV Photage are attached as **Annex-“C”, “D”, “E”**).
 3. Para no 3 pertains to record, as the appellant was issued Show Cause notice on 06-08-2016, accordingly the appellant was also given a chance of personal hearing as per the law but he badly failed to defend himself which is clear from his statement made before the answering respondent. (Copy of Show Cause and Personal Hearing is attached as **Annex- “F”, “G”**)
 4. Para No 4 pertains to record, as the answering respondent acted in accordance with the law and imposed the major penalty on the appellant for the charges of impersonation in NTS test vide Order Endst No 8539-G dated 09-11-2017, however no representation has been made to the answering respondent by the appellant.
 5. The detail replies of the grounds are as under.

GROUND:

- A. Para A is incorrect, baseless, against fact & law, the answering respondent acted in accordance with the law, hence denied.
- B. Para B is incorrect, as thoroughly explained in the facts, as the inquiry report and the evidence received from the NTS administration also prove the impersonation on the part of the appellant, hence denied.
- C. Para C is incorrect, baseless, against facts, the appellant was given full opportunity at the time of inquiry, the appellant also appeared before the inquiry committee, likewise the appellant was given a chance of personal hearing but he badly failed to defend himself, hence denied.
- D. Para D is incorrect, as explained in the preceding para and in the facts, hence denied.
- E. Para E pertains to record, hence need no comments.
- F. Para F pertains to record, as the appellant was given a chance to explain his position but he badly failed which prove his involvement, hence no comments.
- G. Para G is incorrect, the answering respondent acted in accordance with the law, hence denied.
- H. Para H is incorrect, baseless against facts, as thoroughly explained in the preceding paras and in the facts, the appellant was given full opportunity in the entire proceeding but he badly failed, hence denied.

I. The respondent seek permission to raise additional grounds at the time of arguments.

It is therefore humbly prayed that in the light of above facts, the appeal may please be dismissed with cost.

Respondents No 1 to 3

15/6/17
Director E & SE
Peshawar

[Signature]
Secretary to Govt of
Khyber Pakhtunkhwa E & SE Department
Peshawar

15/6/17
District Education Officer
(Male) Mardan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 275/2017

Rasheed Khan, Ex-PST, Sharif Malak Killi Takht Bhai, District Mardan

..... Appellant

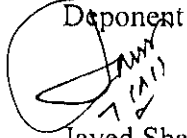
Versus

The Secretary Education (E & SE) Peshawar & Others

..... Respondents

AFFIDAVIT

I, Mr. Javed Shah Legal Advisor Education Department Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by Respondents No 1 to 3 are true to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Deponent

Javed Shah
16101-8562610-3