


FORM OF ORDER SHEET

Court of

Case No. -

990

/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/05/2023	The appeal of Mst. Farzana Sardar resubmitted today by Syed Yahya Zahid Gillani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on-
		By the order of Chairman  REGISTRAR

The appeal of Mst. Farzana Sardar DEO (F) E&SE Lakki Marwat received today i.e. on 11.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- ✓ Check list is not attached with the appeal.
- 2- ✓ Appeal has not been flagged/marked with annexures marks.
- 3- ✓ Annexures of the appeal be attested.
- 4- Copies of transfers orders mentioned in para-11 of the memo of appeal (Annexure-F) are not attached with the appeal be placed on it.
- 5- Copy of show cause notice and reply to thereon is not attached with the appeal which may be placed on it.
- 6- ✓ Annexure-C of the appeal is illegible which may be replaced by legible/better one.
- 7- Departmental appeal having no date be dated.
- 8- ✓ Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

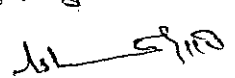
No. 1171 /S.T,

DL 12-04 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Yahya Zahid Gillani Adv.
High Court Peshawar.

All the objection have been attended properly. The objection with respect to final show cause and reply thereto is not available and the same may kindly be condoned/waived under Rule No. ~~6~~ 6(e)(ii)(g) proviso of KP Service Tribunal Rule 1974, and the interest of timely fair justice.


Ashraf Ali
Advocate Peshawar
415123

**BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA HON'BLE PESHAWAR.**

Service Appeal No. 990/2023

FarzanaSardar..... Appellant

VERSUS

Govt of KPK & others.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal along with Affidavit		1-18
2.	Copy of Commendation Certificates.	A	19-24
3.	Copy of Endst: No. 4902/G dated 09-11-2020 & Endst: No.4976/G dated 16-11-2020 for constituting inquiry committee, and letter No.4985 dated 16-11-2020 to the District Police Officer.	B	25-27
4.	Copy of charge sheet and statement of allegations.	C	28-31
5.	Copy of questionnaire and reply of the appellant.	D & D1	32-36
6.	Copy of inquiry report	E	37-49
7.	Copy of transfer order made by respondent No.3.	F	50-51
8.	Copy of Impugned order dated 24-11-2022	G	52-
9.	Copy of departmental appeal /Review Petition	H	53-54
10.	WakalatNama		55


Appellant

Through

Yahya Zahid Gitani
Advocate, Peshawar.

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BEFORE THE HONOURBLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 990 /2023

Khyber Pakhtunkhwa
Service Tribunal

4831

11-04-2023

Farzana Sardar, District Education Officer (F) Elementary
& Secondary Education, Lakki Marwat

..... Appellant

VERSUS

1. The Government of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Khyber Pakhtunkhwa Peshawar.
2. Secretary, Elementary & Secondary Education, KPK Peshawar.
3. Director Education Elementary & Secondary Education, KPK Peshawar.

..... Respondents

Filed to-day

Registrar

11/04/2023

SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 READ WITH RULE 19 OF THE E&D
RULES 2011 AGAINST THE ORDER DATED
24.11.2022 OF RESPONDENT NO.2 AND
AGAINST WHICH APPELLANT FILED
DEPARTMENTAL APPEAL/REVIEW PETITION,
WHICH HAS NOT BEEN DECIDED WITHIN
STATUTORY PERIOD.

Respectfully Sheweth:-

1. That the Appellant is serving as District Education Officer (F) in Elementary & Secondary Education Department KPK with unblemished clean conduct record and has earned commendation certificates for her best performance. She is entitled to all the legal rights in law and fundamental rights guaranteed by the constitution of Islamic Republic of Pakistan. /

(COMMENDATION CERTIFICATES ARE ANNEXURE: A)

2. That the Appellant was transferred and posted as District Education Officer (F), Mardan on 13.04.2020 and she remained posted over there up to November 2020.

3. That during performance of official duties at Mardan, the appellant sensed malpractices in shape of manipulating fake appointment & posting orders. Appellant took timely action to discover the culprits by constituting inquiry committee to probe into the matter of appointments vide office order Endst: No. 4902/G dated 09-11-2020, office order Endst: No.4976/G dated 16-11-2020 and also contacted District Police Officer for lodging FIR against the involved delinquent officers/ officials vide letter No.4985 dated 16-11-2020. **(COPY OF ENDST: No. 4902/G DATED 09-11-2020 & ENDST: No.4976/G DATED 16-11-2020 FOR CONSTITUTING INQUIRY COMMITTEE, AND LETTER No.4985 DATED 16-11-2020 TO THE DISTRICT POLICE OFFICER, ARE ANNEXURE: B)**

4. That the timely action at the part of Appellant annoyed the mischievous elements and in revenge they submitted numerous false allegations against the appellant.
5. That impressed by the false allegations, appellant was served with the charge sheet and statement of allegation on the following points:-
 - i. She has transferred 19 female PST Teachers in utter violation of the Transfer Policy.
 - ii. She has transferred 10 CTs, DMs and TTs in Bari period against the policy.
 - iii. She has transferred 127 PSTs, SPSTs illegally and irregularly, whose record is not available.
 - iv. She has transferred 26 PSTs, TTs, ATs and CTs who were employed School based and were nontransferable.
 - v. She did not take action in time thus facilitated fake inductions.
 - vi. She did not take any action against Mr. Israr and Mr. Imdad, fake employees, although she knew the fact.
 - vii. She although knew the fake employees, yet signed their appointment orders.
 - viii. Mst: Sumbal D/o Rahmat Khan was inducted as Lab: Assistant on fake appointment order while she was DEO (F), Mardan.
 - ix. She although knew, signed fake appointment orders blindly, as confessed by her.

- 4
- x. She being Ex-DEO (F) Mardan are directly responsible for abetment and negligence in the case of fake appointment.
 - xi. She being Ex-DEO (F), Mardan are responsible for fake appointment of Mst: Karishma Shah Lab: Assistant.
 - xii. She is responsible for fake appointment of Mst: Asma C.T.
 - xiii. She being Ex-DEO (F) Mardan are responsible of induction of Fake Employee Mst: Sarwat Lab: Assistant.

(COPY OF CHARGE SHEET IS ANNEXURE: C)

6. That besides the charge sheet, inquiry committee handed over a questionnaire too. Reply thereof was submitted, denying all the charges and raised many questions of law and facts for consideration and to be resolved by the inquiry committee.

(COPY OF THE QUESTIONNAIRE AND REPLY OF CHARGE SHEET / QUESTIONNAIRE ARE ANNEXURE D & D/1)

7. That it is worth mentioning that out of 13 charges levelled against the appellant, **8** charges were admittedly **not proved**. Out of remaining **5** charges **2** were held to be partially proved and **3** were proved, as per the impugned inquiry report. The findings of the inquiry committee to the extent of conclusions in inquiry report on 5 Charges, NO: 1,2,3,4 & 7 are entirely cursory, incorrect, arrived at without application of mind, without considering reply of the appellant, without resolving disputed questions of law and facts, and as such they are against law and facts.

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8. That the inquiry committee failed to bring in iota of evidence against neither the appellant for the adverse findings, nor the appellant was confronted with any record/substance used against her. The inquiry committee conducted slipshod inquiry regarding the adverse conclusions, no evidence with respect to the allegedly proved/ partially proved charges were recorded in support of allegation. The inquiry committee did not at all apply mind to the replies of the appellant in this regard. No opportunity was provided to appellant to be confronted with any record referred in the impugned part of the inquiry report. The ex-parte mode of inquiry was illegally adopted. The adverse findings of the inquiry committee are based on presumptions, conjectures and surmises. Adverse conclusions are not supported by detailed reasons. Cursory remarks without discussing merit of the allegations without evaluation of defense plea are not according to law.

9. That the inquiry committee could not find reliable evidence with reference to the allegedly proved/ partially proved charges. The theme and contents of the inquiry committee itself reveals that it was the timely action of the appellant, which brought the fact of illegal appointments and fake transfer orders in notice. Appellant has been fully exonerated in very clear terms from eight Charges i.e. NO. 5, 6, 8,9,10,11,12,13 & partially exonerated from charges NO. 2 & 3. However, the conclusions in impugned

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inquiry report regarding charges 1, 2, 3, 4 & 7 are against law, facts and principles of natural justice.

(COPY OF THE INQUIRY REPORT IS ATTACHED AS ANNEXURE-"E")

10. That regarding the 1st charge of the charge sheet, that "She has transferred 19 female PST teachers in utter violation of the Transfer Policy", it is humbly submitted that the charge itself is ambiguous and not specific. The appellant was not at all confronted with a single so-called transfer order out of alleged 19 transfer orders during inquiry proceeding, so as to defend herself. In reply to the charge sheet, the Appellant has given an elaborate answer in the relevant para NO. 5, raising question of law and facts, which has not been considered by the inquiry committee. Rather, the inquiry report reveals that an irrelevant answer has been taken in consideration and 'quoted' in the impugned part of the inquiry report which sufficiently reflects the state of indifferent attitude & uncaring mind of the inquiry committee. It portrays that no fair chance of hearing and defense was provided to Appellant and she has been condemned unheard.

11. That regarding the 2nd charge of the charge sheet, that "She has transfer 10 CTs, DMs and TTs in Ban period against the policy", the inquiry committee has concluded that only 4 such orders were passed. However, the Appellant was not confronted with a single so-called order for affording fair and proper opportunity of her defense. In reply to the charge

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sheet, the Appellant has given an elaborate answer in relevant para NO. 6, which has not been considered by the inquiry committee as it reflect in the relevant part of the inquiry report. This also discloses the indifferent & uncaring mind of the inquiry committee. Furthermore, it is humbly submitted that no such ban was notified during this period. Neither such ban order was officially communicated to the District Education Office nor was the same in the knowledge of the appellant and her staff. Had there been any such ban, the respondent No.3, would not have notified posting and transfer orders.

(COPY OF THE TRANSFER ORDERS MADE BY THE RESPONDENT NO.3 IS ANNEXURE-F.)

12. That regarding the 3rd charge of the charge sheet that "She has transferred 127 PSTs, SPSTs illegally and irregularly, whose record is not available", it is humbly submitted that in reply to the charge sheet, the Appellant has given an elaborate answer in relevant para NO. 7, which has not been considered by the inquiry committee as it clearly reflects in the relevant part of the inquiry report. This also signifies the state of indifferent & uncaring mind of the inquiry committee. Actually no such transfers were made which had no record. The inquiry committee did not confront the appellant with any proof/record in support of its conclusions, so as to provide her fair opportunity to defend herself.

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13. That regarding the 4th charge of the charge sheet that "She has transferred 26 PSTs, TTs, ATs and CTs who were employed School based and were nontransferable" it is submitted that the questions of fact raised in para NO. 8 of appellant's reply to the charge Sheet have not been considered and some irrelevant answer has been considered & quoted in the impugned inquiry report. Meaning thereby that her defense plea has not been considered at all and the appellant has not been confronted with any proof of the impugned conclusion.

14. That regarding the 7th charge of the charge sheet, that "She although knew the fake employees, yet signed their appointment orders". The finding of the inquiry committee is based on presumption, surmise and conjectures. The elaborated answer and stance of the appellant mentioned in reply to the charge sheet has been totally ignored. The questions of fact raised by the appellant were not probed at all and purely presumptive conclusion has been drawn which is not permissible in law and further it is hit by principles of natural justice. It is a fact that appellant herself traced the bogus appointment, transfer of Mst: Aşma. There is no evidence that appellant has any link with fake appointment, transfer order etc. Neither the signature of the appellant on fake documents were scrutinized through legal procedure nor was any evidence collected to establish that the fake documents were routed through the office of

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appellant. The pay of the fake documents holder has not been issued /released from the office of District Education Officer, Mardan. In absence of any evidence, how it can be proved that the appellant has any nexus with alleged allegation. The conclusion of the inquiry committee is erroneous, illegal and not tenable.

15. That appellant was served with final show cause notice **but without providing inquiry report and the relevant documents** which was violation of legal rights of the Appellant and resultantly she has been materially prejudiced in her defense. The fair opportunity of personal hearing was not practically provided to the Appellant and thus she has been deprived of legal rights and condemned unheard, as well. Thereafter, vide impugned order dated 24.11.2020 major penalty of reduction to a lower post for a period of three years was imposed upon the appellant, which is illegal.

(COPY OF THE IMPUGNED ORDER DATED 24.11.2020 IS ANNEXURE G)

16. That being aggrieved from the impugned penal order, appellant preferred departmental appeal / review petition, which is still pending without disposal.

(COPY OF DEPARTMENTAL APPEAL IS ANNEXURE H)

17. That the Appellant feeling aggrieved, now having no other adequate remedy but to approach this Hon'ble Court, inter alia on the following grounds:

GROUNDS:-

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the legal, procedural as well as fundamental rights enshrined in law, rules and the constitution of the state, as interpreted and applied in the judicial precedents.

- B) That the impugned findings of the inquiry committee on charges NO. 1,2,3,4 & 7 are in violation of law, facts, and duly guaranteed constitutional rights of the appellant, and the relevant judicial dictums of the superior courts having the force of law. Hence, the impugned findings of inquiry committee and the final impugned order based thereon are not tenable.

- C) The whole procedure adopted by the inquiry committee during inquiry proceedings was against the appellant's constitutional rights to have a fair trial, law, rules, policy, judicial precedents and the established principles of natural justice. Hence, the impugned findings of inquiry committee and the final impugned order based thereon are not maintainable.

- D) That respondents have utterly violated Article 4, 10-A of the constitution of the Islamic republic of Pakistan 1973. Hence, the impugned findings of

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inquiry committee and the final impugned order based thereon are not sustainable.

E) That it was bounden legal obligation of the inquiry committee to have exhibited and confronted the appellant with each and every document used against her to get her specific response and explanation which was not done and as such the inquiry proceeding do not commensurate to the concept of fair trial which is indefeasible right of appellant, under the law, principles of natural justice and the fundamental rights secured by the constitution. Hence, the impugned findings of inquiry report and the impugned order based thereon are not sustainable.

F) That the appellant was falsely blamed for certain irregularities which had no base. The appellant being competent authority took serious notice of the irregularities and constituted impartial inquiry committee to probe into the matters of alleged illegal appointments and also sought advice from the competent authority and requested District Police Officer to register criminal case against the culprit. This aspect of the case has been totally admitted by the inquiry committee and exonerated her from all other charges. The appellant initiated action because she was with clean hands but the inquiry committee did not appreciate this logical ground

in support of the innocence appellant because the whole proceedings about impugned findings were carried out without application of mind. Hence, the impugned findings of inquiry report and the impugned order based thereon are not worth reliance.

G) That the findings of the inquiry committee with respect to charges No.1 & 2 i.e illegal transfer orders in violation of posting / transfer policy and other transfer order allegedly issued during ban period are also not worth credit. It is evident from the contents of the inquiry report that the alleged allegations have not been scrutinized in its true spirit as per law and procedure of a fair trial. Posting and Transfers are always made due to exigency of service and in public interest. The following data and observations were necessary for the proper disposal of alleged accusation. But the inquiry report is silent about it.

- a. Which condition of the Posting / Transfer Policy 2019 was violated?
- b. What were the nineteen transfer orders, their Notification numbers, date, place of posting, name of the employees?
The inquiry report is silent about all that.
- c. Whether the relied upon documentary evidence was duly exhibited according to law and the appellant was duly confronted with the documentary evidence regarding the alleged posting / transfers orders?

d. The inquiry committee also failed to scrutinize and evaluate the alleged transfer and other orders as to whether the same were issued in public interest / in exigency of service, on medical ground, due to mutual transfer and wedlock policy? The inquiry committee has also not scrutinized the transfer orders whether they were issued during ban period or in relaxation of ban by the competent authority or the same were issued beyond the period of alleged ban. It is also not certain as to what type of ban was imposed on posting / transfer and also the duration of such ban.

Absence of scrutiny of abovementioned basic legal and factual aspects of the case, during the inquiry proceedings, reveals that the inquiry committee has not done justice in letter and spirit and the superficial findings are illegal. Hence, the impugned findings of inquiry report and the impugned order is not are liable to cancellation.

H) That the so called malafide intention and personal interest of the appellant has not been inquired or probed. This also indicates that inquiry has not taken place in depth and it does not indicate the guilt. Hence, the impugned findings of inquiry report and the impugned order is not are liable to cancellation.

I) That it is well settled Law and consistent view of the August Superior Courts that whenever any major punishment is to be imposed the procedure provided under the E&D rules 2011 must be followed and

without proper inquiry no order in respect of Civil Servant is sustainable in the eyes of law.

J) That fair play, transparent and impartial inquiry is fundamental right of the appellant as envisaged under Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973 but in the instant inquiry, the said fundamental right has been badly violated which has made the impugned order not only irregular but also illegal ab-initio.

K) That section 16 of the Civil Servant Act, 1973 provide that a civil servant is liable for prescribed disciplinary actions and penalties only through prescribed procedure. In instant case prescribed procedure has not been followed.

L) That so called slipshod inquiry has been conducted in the absence and at the back of the appellant. Appellant active participation during inquiry proceedings has been willfully and deliberately ignored. Inquiry proceedings are of judicial in nature in which participation of accused civil servant as per law is a condition sine qua non. On this ground the impugned orders are corm non judice and liable to be set back.

M) That the well-known principle of law "Audi alteram Partem" has been violated. This principle of law is always deemed to have embedded in every statute even though there was no specific or express provision in this regard.

....An adverse order passed against a person without affording him an opportunity of personal hearing was to be treated as void order. Reliance is placed on 2006 PLC (CS) 1140.

As no proper personal hearing has been afforded to the appellant during inquiry proceedings about the documents relied upon by the inquiry committee and also before the issuing of the impugned order, therefore, on this ground as well the impugned order is liable to be set aside.

N) That under the provision of Rule 14 of E & D Rule, 2011, the competent authority was under legal obligations to peruse the inquiry report and determine as to whether the inquiry has been conducted in accordance with prescribed procedure and whether the charge are proved or otherwise. The competent authority has made no such efforts and dismissed the appellant with a single stroke of pen, which is nullity in the eyes of law and liable to be interfered with by this Honorable Tribunal.

O) That the non-provision of the inquiry report coupled with the relied upon documents amounts to deprive a civil servant from confronting and defending himself against the so-called evidence that may go against him, which is against the provision of Article 10A of the Constitution of Pakistan, 1973.

P) That appellant has been condemned unheard being deprived of the right personal hearing in true compliance of legal mandate, as per rules.

Q) That an accused is presumed to be innocent unless proved otherwise and the benefit of doubt always goes to the accused and not to the prosecution as it is for the prosecution to stand on its own legs by proving all allegations to the hilt against the accused. Mere conjectures and presumption, however strong, could not be made a ground for demoting a civil servant [1999 PLC (CS) 1332 (FST)]..... Unless and until prosecution proves accused guilty beyond any shadow of doubt, he would be considered innocent [1983 PLC (CS) 152 (FST)]. The impugned order has been passed in violation of these principles.

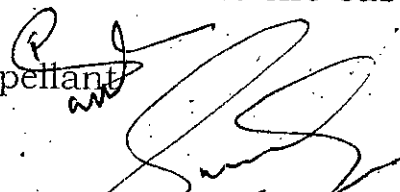
R) That Civil servant who was deprived from his /her original position through arbitrary and whimsical action of the government functionaries and reinstated to his / her original position through judicial order of Service Tribunal would have every right to recover arrears of salaries by way of back benefits due to him / her during the intervening period. It would be very unjust and harsh to deprive the appellant from back benefits for the period for which they remained out of her original position without any fault on her / his part.Supreme Court allowing their appeal and

directing payment of back benefits to the appellant. 2006 T D (SERVICE) 551 (a).

S) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

It is therefore, most humbly prayed that on acceptance of the instant Appeal the impugned findings of inquiry committee and the impugned Order dated 24.11.2022 against the appellant may kindly be declared null and void ab-initio, illegal, ineffective upon the rights of the Appellant and may be set aside; and the appellant may kindly be reinstated on her original position with all back benefits.

Any other relief not specifically asked for may also graciously extended in favor of the Appellant s in the circumstances of the case.

Appellant 

Through

Syed Yahya Zahid Gilani
Advocate

Ashraf Ali Khattak
Advocate, Supreme Court of Pakistan

Syed Murtaza Zahid Gilani
Advocate

CERTIFICATE:

It is certified that no such like Service Appeal has earlier been filed before this Hon'ble Tribunal.


DEPONENT

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA HON'BLE PESHAWAR

Service Appeal No. ____/2023

FarzanaSardar..... Appellant

VERSUS

Govt of KPK & others.....Respondents

AFFIDAVIT

I, Farzana Sardar, District Education Officer (F) Elementary & Secondary Education, LakkiMarwat, do hereby solemnly affirm and declare that the contents of the accompanying **Service Appeal** true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

DEPONENT

CNIC NO: 14301-3286840-8

CEU NO: 03339665380

identified by:

Syed Khuram Zeb Gilani

Advocate High Court

BC NO: 11-1530

CEU: 0300/224999

CNIC: 17301-519579-5



Anx - A

**OFFICE OF THE
ASSISTANT COMMISSIONER SUB DIVISION BETTANI**

Ph No. 0969 538323

Email: acsdbettani@gmail.com

No. 132 /HC/SDB/Education Corresp/F-3

Dated 9 /03/2023

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To

The Deputy Commissioner
Lakki Marwat

Subject:
Memo

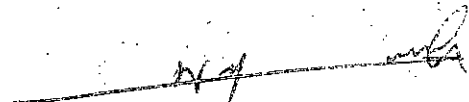
RECOMMENDATION FOR BEST PERFORMANCE CERTIFICATE

It is stated that Miss. Farzana Sardar, District Education Officer (Female) has been played key role in streamlining of education system, ensuring duties of the teaching and non-teaching staff at various schools in Lakki Marwat. Her role in streamlining is remarkable especially in Sub Division Bettani. Most of the schools were closed and there was no clear record of schools as well as teaching and non-teaching staff at various schools.

Recently DEO(F) Lakki Marwat submitted report vide letter No.1312 dated 02.03.2023 in which action has been initiated against absent staff, stopped the salaries of staff working at wrong post and over payment in their basic pay scale. (copy attached)

Reportedly some schools like GGMS Kalu Khan, GGMS Gul Anar, GGPS Zahir Shah, GGPS Gharib Shah, GGPS Faqir Saleh Din, GGPS Gul Azad, GGPS Feroz Tajbi Khel and GGHS Mir Qabal etc are functional and some teaching staff has started their duties in the mentioned schools.

In view of the above, Miss Farzana Sardar DEO(F) Lakki Marwat is hereby recommended for best performance certificate and she may be awarded a best performance certificate in the best public interest.


Assistant Commissioner
Sub Division Bettani
Lakki Marwat

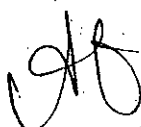
Even No. & Date

Copy forwarded for information to:

1. The District Education Lakki Marwat with the request to extend more efforts in improvement of education department of Lakki Marwat as well as Sub Division Bettani.
2. PS to Director General Education Peshawar Govt of Khyber Pakhtunkhwa.

DA D & Dispatch

DEO may be informed accordingly



13/3/2023

Assistant Commissioner
Sub Division Bettani
Lakki Marwat

20/

INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of September 2019
to

Farzana Sardar

DDEO (Female) – Middle Schools
for performance in improving education service delivery.

Date: 30-10-2019

Matiullah

Matiullah Khan,
Deputy Commissioner, Kohat



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



Certificate of Recognition

INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of May 2019
to

Farzana Saridar

DEO (Female) -Middle Level
for performance in improving education service delivery.

Date: June 20, 2019



Matiullah Khan
Deputy Commissioner, Kohat



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

22

INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of September 2019
to

Farzana Sardar

DEO (Female) - High / Higher Secondary
for performance in improving education service delivery.

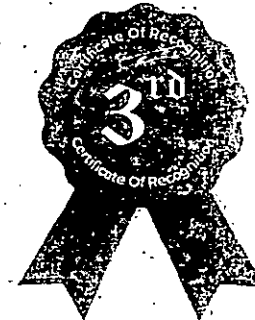
Date: 30-10-2019

Matiullah

Matiullah Khan
Deputy Commissioner, Kohat



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



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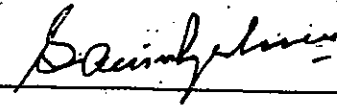
INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of May 2019.
to

Forzana Sardar

DEO (Female) –High / Higher Secondary
for performance in improving education service delivery.

Date: June 20, 2019



Matiullah Khan
Deputy Commissioner, Kohat



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

H /

Certificate of Recognition

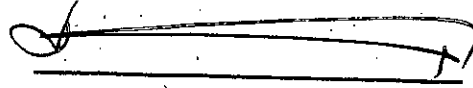
DISTRICT PERFORMANCE SCORECARD (DPS)

is hereby awarded for the month of September 2018
to

Farzana Sardar

District Education Officer Female - Hangu
For performance in improving education service delivery.

Date: November 01, 2018



Mukhtiar Ahmad
Secretary, Elementary & Secondary Education



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



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

Anx-B

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NOTIFICATION.

The following officer/Official are hereby nominated as inquiry officer to conduct the inquiry in connection with the case of Bogus Appointment in respect of Mst: Sarwat D/O Khan Gul Lab: Attendance at GGHSS, Kohl Barmol Katlang.

In this regard the following inquiry committee is hereby constituted by the undersigned to inquiry the case and submit their report within three days immediate to proceed for further into the matter.

- (1) .Mr, Arshad Hussain. Principal, GH5, Katlang Babuzai.
- (2). Miss: Fouzia Azam, Pri: GGHSS, Khazana Dheri Mardan.

(FARZANA SARDAR)
DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

Endst: No. 4807/G / Pry: Branch, Dated Mardan the, 08-11 / 2020.
Copy to the:-

1. District Education Officer (Male) Mardan with the remarks with the request to spare Mr, Arshad Hussain. Principal, GH5, Katlang Babuzai for the said inquiry.
2. Mr, Arshad Hussain, Principal, GH5, Katlang Babuzai.
3. Mst: Fouzia Azam, Principal, GGHSS, Khazana Dheri Mardan.


DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN
PHONE/FAX NO. 0921-9830190
Email Address: amimardan@edofemale@yahoo.com

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NOTIFICATION.

The following Officers are hereby nominated as Inquiry Officers to conduct the inquiry in connection with the Dastar of Dignity Appointments detail as given below:

1. Ms. Sairwat D/O Khan Gul Lali Attendance at G.H.S. Kothi Barand Kallang Mardan
2. Mr. Asmatullah D/O Mulla Hunda Land Khasan Mardan

In this regard the following committee is hereby constituted by the undersigned to investigate and submit their report within three days immediately to proceed further into the matter.

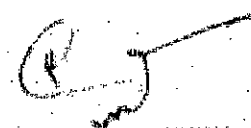
1. Mr. Ashraf Ali Principal, G.H.S. Baghaloda Mardan. Chairman
 2. Mr. Arshad Hussain Principal, G.H.S. Kallang Babuzo. Member
 3. Ms. Fozia Azam Principal, G.H.S. Khazana Dhori Mardan. Member
- NOTE: The Notification issued vide this office order No. 4902/Pry. Branch Dated 9.11.2020 is hereby withdrawn.

(FARZANA SARDAR)
DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

Order No. 4976/9 File. Inquiry Dignity Appointments. Dated: 16/11/2020

Copy for information to the:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Male) Mardan with the request to allow the above named 'Mal' Office for the said Inquiry please.
3. Mr. Ashraf Ali Principal, G.H.S. Baghaloda Mardan.
4. Mr. Arshad Hussain Principal, G.H.S. Kallang Babuzo, Mardan.
5. Principal, G.H.S. Khazana Dhori Mardan.


DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN**NOTIFICATION**

The following Officers are hereby nominated as Inquiry Officers to conduct the inquiry in connection with the basis of Bogus Appointments as given below:

1. Mst Sarwat D/o Khan Gul Lab Asasistant at GGHSS, Kohi Barmol Katlang Mardan
2. Mst Asmat GGHS Moli Banda Lund Khawar Mardan.

In this regard the following committee is hereby constituted by the undersigned to inquire and submit their report within three days immediately to produce further into the matter.

1. Mr Ashraf Ali Principal, GHSS, Baghdada Mardan Chairman.
2. Mr Arshad Hussain Principal, GHS, Katlang Babuzo Member
3. Mst Fozia Azam Principal, GGHSS Khazana Dheri Mardan Member

Note: The Notification issued vide this office endost: No. 4902/Pry: Branch Dated 09.11.2020 is hereby withdrawn.

**(FARZANA SARDAR)
DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN**

Endst No. 4976/9/File, Inquiry Bogus Appointments

Dated 16.11.2020

Copy for information to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Male) Mardan with the request to allow the above named Male Office for the said inquiry please.
3. Mr Ashraf Ali Principal, GHSS, Baghdada Mardan Chairman.
4. Mr Arshad Hussain Principal, GHS, Katlang Babuzo Member
5. Mst Fozia Azam Principal, GGHSS Khazana Dheri Mardan Member

**DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN**

LEGIBLE COPY

OFFICE OF THE DISTRICT EDUCATION OFFICER

(FEMALE) MARDAN

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To,

The District Police Officer
Mardan

**Subject: REQUEST FOR LODGING FIR AGAINST MST SARWAT D/O
KHAN GUL**

Memo:

It has come to the notice of the undersigned that an appointment order has been notice in the name of Mst Sarwat D/o Khan Gul R/o Katlang Mardan against the post of Lab Assistant B-7 at GGHSS Koi Harmol (copy of order attached). The said order has been created by making a copy of another order and modifying the section where name of the appointee is mentioned. The dispatch No on the appointment order was also found bogus as it was not found when checked in the office register.

Therefore, it is requested that FIR may be lodged against the above named bogus appointee investigate the matter properly please.

Mst Rukhsana Rahim
Dy: DEO (F) Mardan

Mst. Farzana Sardar
DEO (F) Mardan

DISCIPLINARY ACTION

1 P (2)

I, Dr. Nazim Niaz, Chief Secretary, Khyber Pakhtunkhwa as the Competent Authority, am of the opinion that, Ms. Farzana Sardar ex-DEO (F) Mardan, has rendered herself liable to be proceeded against, as she committed the following acts/omissions, within the meaning of Rules of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

- i. She has transferred 9 fake PST teachers in utter violation of the Transfer Policy.
- ii. She has transferred 10 CTs, DMs and TIs in bias period, against the Policy.
- iii. She has transferred 127 PS to SPSs illegally and irregularly, whose record is not available.
- iv. She has transferred 26 PSs, TIs, ATs and CIs who were employed school based and were non-transferrable.
- v. She did not take action in time thus facilitated fake inductions.
- vi. She did not take any action against Mr. Israr and Mr. Imad, fake employees, although you knew the fact.
- vii. She although knew of fake employees, yet, signed their appointment orders.
- viii. Ms. Samra D/O Rajna Khan was inducted as lab assistant on fake appointment order while she was DEO (F), Mardan.
- ix. She, although, have, signed fake appointment order blindly, as confirmed by her.
- x. She, being ex-DEO (F) Mardan are directly responsible for the above negligence in the case of fake appointments.
- xi. She being ex-DEO (F) Mardan are responsible for fake appointments of Karsana Bhatt Lab Assistant.
- xii. She is responsible for fake appointment of Mr. Agha...
- xiii. She being ex-DEO (F) Mardan are responsible for fake appointments of Mr. Saad...

DISCIPLINARY ACTION

I Dr Kazim Niaz, Chief Secretary, Khyber Pakhtunkhwa as the Competent Authority, am of the opinion that Mst. Farana Sardar Ex-DEO(F) Mardan, has rendered herself liable to be proceeded against, as she committed the following acts/omissions, within the meaning of Rule-6 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

- i. She has transferred 19 female PST teachers in utter violation of the Transfer Policy.
 - ii. She has transferred to CTs, DMs and TTs in ban period, against the policy.
 - iii. She has transferred 127 PSTs/SPSTs illegally and irregularly, whose record is not available.
 - iv. She has transferred 26 PSTs, TTS, ATs and CTs who were employed school based and were no transferable
 - v. She did not take action in time thus facilitated the fake inductions.
 - vi. She did not take any action against Mr Israr and Mr Imad, fake employees, although you knew the fact.
 - vii. She although knew the fake employees, yet signed their appointment orders.
 - viii. Mst Sumbal D/o Rahmat Khan was inducted as Lab Assistant on fake appointment order while she was DEO(F) Mardan.
 - ix. She although knew, signed fake appointment order blindly, as confessed by her
 - x. She, being ex DEO (f) Mardan are directly responsible for abetment and negligence in the case of fake appointment.
 - xi. She being ex DEO (F) Mardan are responsible for fake appointment of Mst Karishma Shah lab Assistant.
 - xii. She is responsible for fake appointment of Mst Asma C.T.
 - xiii. She, being ex DEO (F) Mardan are responsible of induction of fake employee Mst Sarwat Lab Assistant.
2. For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer / inquiry committee, consisting of the following is constituted under Rule 10(1)(a) of the Rules ibid.

UGC SUPPL

Dr. Karim Nadeem, Director, Khyber Pakhtunkhwa University of Health Sciences, Peshawar
And hereby charge you, Mr. Karim Nadeem, Director, Khyber Pakhtunkhwa University of Health Sciences, Peshawar
with the irregularities

- i. You have transferred 19 female staff & 20 male staff to other departments without the sanction of the Government of Punjab.
- ii. You have transferred 10 CTS, DMs and 11 to other departments without the sanction of the Government of Punjab.
- iii. You have transferred 107 PST/SPTSs irregularly and irregularly without the sanction of the Government of Punjab.
- iv. You have transferred 26 PSTs, 11 CTS, 1 DM and 11 to other departments without the sanction of the Government of Punjab and were non-eligible for transfer.
- v. You have transferred 10 to other departments without the sanction of the Government of Punjab.
- vi. You did not take any action against Mr. Asim C T and Mr. Farid Ullah Khan, who were appointed as fake employees, although you knew the fact.
- vii. You, although know of fake employees, yet signed their appointment orders.
- viii. Mr. Farid Ullah Khan was induced as a fake employee on the basis of the appointment order which was signed by you, although you knew the fact.
- ix. You, although knew, signed fake appointment order blindly as confessed by Mr. Farid Ullah Khan.
- x. You, being ex DEU (F) Mardan are equally responsible for the appointment and negligence in the case of fake appointments.
- xi. You, being ex DEU (F) Mardan are equally responsible for the appointment of Mr. Farid Ullah Khan as a fake employee.
- xii. You are responsible for the appointment of Mr. Asim C T as a fake employee.
- xiii. You, being ex DEU (F) Mardan, are equally responsible for the appointment of Mr. Farid Ullah Khan as a fake employee.
- xiv. You, being ex DEU (F) Mardan, are equally responsible for the appointment of Mr. Farid Ullah Khan as a fake employee.

If you are found guilty of the above charges, you shall be liable for disciplinary and other action under Rule 10 of the Khyber Pakhtunkhwa Government Servants (Disciplinary and Other) Rules, 2011. You shall be liable for disciplinary and other action under Rule 10 of the Khyber Pakhtunkhwa Government Servants (Disciplinary and Other) Rules, 2011.

CHARGE SHEET

I Dr Kazim Niaz, Chief Secretary, Khyber Pakhtunkhwa as the Competent Authority, hereby charge you Mst. Farana Sardar Ex-DEO(F) Mardan as follows:-

- i. You have transferred 19 female PST teachers in utter violation of the Transfer Policy.
- ii. You have transferred 10 CTs, DMs and TTs in ban period, against the policy.
- iii. You have transferred 127 PSTs/SPSTs illegally and irregularly, whose record is not available.
- iv. You have transferred 26 PSTs, TTS. ATs and CTs who were employed school based and were no transferable
- v. You did not take action in time thus facilitated the fake inductions.
- vi. You did not take any action against Mr Israr and Mr Imad, fake employees, although you knew the fact.
- vii. You although knew the fake employees, yet signed their appointment orders.
- viii. Mst Sumbal D/o Rahmat Khan was inducted as Lab Assistant on fake appointment order while she was DEO(F) Mardan.
- ix. You although knew, signed fake appointment order blindly, as confessed by her
- x. You, being ex DEO (f) Mardan are directly responsible for abetment and negligence in the case of fake appointment.
- xi. You being ex DEO (F) Mardan are responsible for fake appointment of Mst Karishma Shah lab Assistant.
- xii. You are responsible for fake appointment of Mst Asma C.T.
- xiii. You, being ex DEO (F) Mardan are responsible of induction of fake employee Mst Sarwat Lab Assistant.

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

3) you are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the inquiry committee, as the case may lie.

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

5) Initiate whether you desired to be heard in person.

6) A statement of allegations is enclosed.

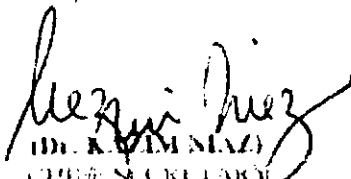
(DR KAZIM NIAZ)
CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Mst Farzana Sardar
Ex-DEO(F), Mardan

(i) Muhammad Ramzan MD.
 M. A. Edu. Foundation
 (ii) Mrs Taslim Begum Principal BS. 20

The inquiry officer/inquiry committee shall, at all stages, ensure that the accused officers are provided reasonable opportunity of hearing to the accused, record its findings and submit the same within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

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


 (M. K. M. MAZHAR)
 CHIEF SECRETARY
 RAJYALOKA, KARHUKHWA

Yashwantrao Sardar
Ex. DDO (F), Marudan

Questionnaire to Mst Farzana Sardar Ex- DEO (F) Mardan

1. Mention your full name and official Designation.
2. Mention your full and exact tenure in the office of DEO (F) Mardan.
3. Did you really transfer 19/20 female PST teacher in utter violation of the transfer policy. Give its detail and justification if you have any.
4. Why did you transfer 10 CTs, DMs & TTs in Ban period against the policy. Give its detail and justification if you have any.
5. Were aware of the ban imposed by Government.
6. Did you transfer 127 PSTs, SPSTs illegally and irregularly and misplaced their transfer record. Give its detail and defence in your support against the charge.
7. Did you transfer 26 PSTs, TTs, ATs and CTs who were employed against school based policy and were not transferable. Give its detail and justification for the omission and commission.
8. How many employees did Mst Rukhsana Transfer
9. How many employees did you transfer illegally and after realization you canceled these orders.
10. How many employees did Mst Rukhsana appoint.
11. How many employees did you appoint.
12. Did you collect the appointment orders of all the appointees from the school.
13. Did Mr Israr offer any illegal gratification to you.
14. Why did you fail to take action well in time against the direct induction.
15. Mr Israr and Mr Imad who had been fakely inducted in the system had also been facilitated by you. Mention their personal numbers, cost centers, length of service payment made to them.
16. What is the relation of Mr Israr with Mst Rukhsana Raheem Dy DEO.
17. What is the relation ship of Mst Rukhsana Dy DEO, Israr clerk and Ammad clerk
18. Mention their present status please whether removed or still in service.
19. Why did you sign the appointment order of fake employees.
20. Do you carry out reconciliation of expenditure and Posts.
21. Did you appoint Mst Sumbal D/O Mr Rehmat khan Lab Asstt irregularly during the course of your tenure as DEO. Mention her personal numbers, cost centers, length of service payment made to her. Mention her present status please whether removed or still in service.
22. Did you confess in the FFI, the appointment of fake employee made by you. If yes what forced you make appointment.
23. You in your capacity as DEO is responsible for all ills of appointment of district cadre posts. Did you appoint Mst Karishma Shah Lab Asstt during your tenure as DEO. Mention her personal numbers, cost centers, length of service payment made to her. Mention her present status please whether removed or still in service.
24. Did you appoint Mst Asma CT during your tenure as DEO. Mention her personal numbers, cost centers, length of service, payment made to her. Mention her present status please whether removed or still in service.
25. You in your capacity as DEO (F) Mardan inducted fake employees Mst Sarwat Lab Asstt. Mention her personal numbers, cost centers, length of service payment made to her. Mention her present status please whether removed or still in service.
26. How many other employees you inducted in the system directly besides the above. Mention their personal numbers, cost centers, length of service payment made to them. Mention their present status whether removed or still in service or otherwise.

27. What are your comments about the 737 appointees appointed wef 01.01.2018 to 31.10.2021. summary attached .
28. Any comment you want to forward not being covered by the above questions
29. Have you got any mechanism to curb direct induction in the system please

Atiq ur Rahman, (IO)
Principal
GHSS#1 Peshawar Cantt

To,

The Managing Director,
Education Foundation Merged Districts,
Peshawar.

Subject: REPLY TO CHARGE SHEET

Respected Sir,

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

- ✓ 1. That I have served in Elementary & Secondary Education Department on various posts.
- ✓ 2. That lastly I served as DEO Female at District Mardan from 13-04-2020 till November 2020.
3. That I have served to the best of my ability, dedication, devotion and honesty.
- ✓ 4. That I have served to the entire satisfaction of my superiors till date.
- ✓ 5. That in reply to the Para Charge No. 1 it is stated that no violation has been made in respect of transfer order as the same was made on justified ground and all were made before the ban period.
6. In reply to Para/Charge No. 2 that no transfer have been made in the ban period during my tenure at District Mardan.
7. In reply to Para/Charge No. 3 no such transfers in a bulk have been made which have no record.
- ✓ 8. In reply to Para/Charge No. 4 it is stated that it came in to my knowledge that some orders have been made out with my scanned signature having no record in the office, I abruptly called the meeting of all head teachers along with SDEOs ADEOs to dig out any other fake order to be addressed accordingly. It was disclosed that there are also some other fake orders including those teachers who are purely school based. However, I cancelled/withdrawn all those transfers order if any of school based teacher vide Endst No 4623 G Dated 22 10 2020. (Copy attached as Annex - "A")
- ✓ 9. In reply to Para/Charge No. 5 it is contended that during the meeting with head teachers and other official at various stations it was also disclosed that some of the bound appointments have been made having my fake signature and a bogus dispatch Nos. after checking the same in to the office register. I myself ordered and nominated inquiry officers vide Endst No. 4902/G dated 09-11-2020 and Endst No. 4976-G dated 16-11-2020 to inquire the said fake order in all respect. I also forwarded a request to the DPO concerned regarding FIR against Mst: Sarwat Lab Assistant after full satisfaction vide No 4985 dated 16-11-2020. (Copies attached as Annex - "B", "C", "D")
- ✓ 10. That during the entire proceeding it was found that one Mr. Israr Junior Clerk of GGHSS Koper is involved in all these bogus appointments etc used my scanned sign and bogus dispatch Nos. By checking his status documents it was found that he was transferred from district Malakand and his transferred is duly verified Vide No 14120

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To,

The Managing Director,
Education Foundation Merged Districts,
Peshawar.

Subject: **REPLY TO CHARGE SHEET**

Respected sir,

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

- 1) That I have served in Elementary & Secondary Education Department on various posts.
- 2) That lastly I server as DEO Female at District Mardan from 13-04-2020 till November 2020.
- 3) That I have server to the best of my ability, dedication, devotion and honesty.
- 4) That I have server to the entire satisfaction of my superiors till date.
- 5) That in reply to the Para/Charge No. 1 it is stated that no violation has been made in respect of transfer order as the same was made on justified ground and all were made before the bad period.
- 6) In reply to Para/Charge No. 2 that no transfer have boon made in the ban period during my tenure at District Mardan.
- 7) In reply to Para/Charge No. 3 no such transfers in a bulk have boon made which have no record.
- 8) In Reply to Para/Charge No 4 it is stated that it came in to my knowledge that some orders have been made out with my scanned signature having no record in the office. I abruptly called the meeting of all teachers along with SDEOs ADEOs to dig out any other fake order to be addressed accordingly. It was disclosed that there are also some other fake orders including those teachers who are purely school based. However, I cancelled/withdrawn all those transfers order if any of school-based teacher vide Endst No 4623/G Dated 22/10/2020. (Copy attached as Annex – "A")
- 9) In reply to Para/Charge No. 5 it is contended that during the meeting with head teachers and other official at various stations it was also disclosed that some of bound appointments have been made having my fake signature and a bogus dispatch Nos. after checking the same in to the office register, I myself ordered and nominated inquiry officers vide Endst No. 4902/G dated 09-11-2020 and Endst No. 4673/G dated 16-11-2020 to inquire the said fake order in all respect. I also forwarded a request to the DPO concerned regarding FIR against Mst. Sarwat Lab Assistant after full satisfaction vide No 4985 dated 16-11-2020. (Copies attached as Annex "B" "C" "D")
- 10) That during the entire proceeding it was found that on Mr. Israr Junior Clerk of GGHS Koper is involved in all these bogus appointment etc used my scanned sign and bogus disnatch Nos. Bv checking his status/documents it was found that he was transferred

dated 04/10/2020 from the concerned quarters. It was later on disclosed after the arrest of Law Enforcement Agency that his appointment order and the order of Mr. Inad were also fake. But at that time I was transferred from Mardan due to which I was unable to take any action against him and others. (Copy attached as Annex - "E")

- 11. In response to Para/Charge No 7. It is stated that none of the alleged/fake appointment have been made/signed by me and the dispatched Nos. over the said appointments are totally bogus and have no record in the office dispatch register.
- 12. That the appointment order of Mst; Sumbal D/O Rahmat Khan is issued before my arrival as DEO (Female) Mardan as I took charge in March 2020. As the same does not bear my signature. The said order was issued on 06-01-2020. However, the sign of the than DEO (Female) also seems to be the fake/scanned affixed over it along with the bogus dispatch No. which has no record in the office register. (Copy attached as Annex - "F")
- 13. That I have not made any statement and confession at any state that I have blindly signed any order. Nor I have been heard by anyone as per the law according.
- 14. That I am not responsible for any kind of abetment and negligence at any stage. As I have thoroughly explained above. I took firm action against the one Mst; Sarwat Lab Assistant till my presence at the station, ordered an Inquiry and forwarded a request for FIR to the DPO. However, I was transferred from Mardan that's why I was unable to proceed against the others. If I was involved at any stage I would not have made any actions which clearly show my innocence in this regard.
- 15. That the appointment order of Mst; Karishma Shah Lab Assistant is also a fake and factitious appointment having my fake/scanned sign. As the fake dispatch No. 5690/G having date as 26-10-2020 on the appointment order this is bogus and has no record in the office register. This is also evident from the office register that the dispatch No. in continuation was 4623/G on 22-October-2020 while in start of November 2020 4902/G. That's why the salary of Mst; Karishma was not drawn being the fake order. (Copy attached as Annex - "G")
- 16. That Appointment orders of Mst; Asma CT BPS-15 is totally fake in all respect having fake/scanned sign along with the bogus dispatch No. which has no record in the office register. It is worth mentioning that this illegal act can also be explained from this illegality that two different appointment orders of Mst; Asma CT BPS-15 were made on the same date with different Endst No. 1704/G & 1706/G. The said orders also bear two different initial which also shows the illegality. Likewise Mst; Asma CT BPS-15 was shown under transfer from other district GGHS Khanori Malakand on 14-09-2020 vide Endst No. 31430-35 from the school from where Mr. Israr Junior Clerk transfer is shown. (Copies attached as Annex - "H", "I", "J")
- 17. That the pay release order is also fake and factitious as evident from the endorsement No. of the pay release order as the same has file name SS/SST/2019-20. While, in case of CT BPS-15 the file name in the Endst No must be CT/2020-21 accordingly. This shows the bogusity in all respect.

dated 04/10/2020 from the concerned quarters. It was later on disclosed after the attest of Law Enforcement Agency that his appointment order and the order of MR. Imad were also fake. But at that time, I was transferred from Mardan due to which I was unable to take any action against him and others. (Copy attached as Annex - "E")

- 11) in response to Para/Charge No. 7. It is stated that alleged/fake appointment have been made/signed by me and the dispatched Nos. over the said appointments are totally bogus and have no record in the office dispatch register.
- 12) That the appointment order of Mst. Sumbal Rahmat Khan is issued before my arrival DEO (female) Mardan as I took charge in March 2020. As the same does not bear signature. The said order was issued on 06-01-2020. However, the sign if the than DEO (Female) also seems to be fake/scanned affixed over it along with the bogus dispatch No. which has no record in the office register. (Copy attached as Annex "F")
13. That I have not made any statement and confession at any state that I have blindly signed any order. Nor I have been heard by anyone as per the law according.
14. That I am not responsible for any kind of abetment and negligence at any stage. As I have thoroughly explained above. I took firm action against the one Mst. Sarwat Lab Assistant till my presence at the station. Order an inquiry and forwarded a request for FIR to the DPO. However, I was transferred from Mardan that's why I was unable to proceed against the others. If I was involved at any-stage I would not have made any actions which clearly show my innocence in this regard.
15. That the appointment order of Mst. Karishma Shah Lab Assistant is also a fake and factitious appointment having my fake /scanned sign. As the fake dispatch No. 5690/G having date as 26-10-2020 on the appointment order this bogus and has no record in the office register. This is also evident from the office register that the dispatch No. in continuation was 4623/G on 22-October 2020 while in start of November 2020 4602/G. that's why the salary of Mst. Karishma was not drawn being the fake order. (Copy attached as Annex - "G")
16. That appointment order of Mst. Asma CT BPS-15 is totally fake in all respect having fake/scanned sign along with the bogus dispatch No. Which has no record in the office register. It is worth mentioning that this illegal act can also be explained from this illegality that two different appointment orders of Mst. Asma CT BPS-15 were made on the same date with different Endst No. 1704/G & 1706/G. The said orders also bear two different initial which also shows the illegality. Likewise Mst. Asma CT BPS-15 was Endst shown under transfer from other district GGHS Khanori Malakand on 14-09-2020 vide Endst No. 31430-35 from the school from where Mr. Israr Junior Clerk transfer is shown (Copies attached as Annex "H", "I", "J")
17. That the pay release order is also fake and factitious as evident from the endorsement No. of the pay release order as the same has file name SS/SST/2019-20. While, in case of CT BPS-15 the file name in the Endst No must be CT/2020-21 accordingly. This shows the bogosity in all respect.

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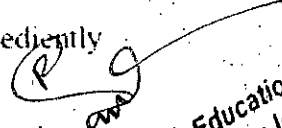
18. That it came in to my knowledge by the letter of District Account Officer Mardan vide No. DCA/MRD/ADMIN/2020-21/2018 dated 11-11-2020 regarding the status of the Appointment order of Mst; Asma CT, BPS-15. (Copy attached as Annex - "K")
19. That after checking the entire record it was conveyed to the DAO Mardan vide Letter No 4970 dated 14-11-2020 by the DEO (Female), that the appointment order of the Mst; Asma CT, BPS-15 is totally fake & bogus and is not traceable in the record of the office nor any pay release order has been issued from the office. The pay is also not released to the Mst; Asma CT being bogus appointment. (Copy attached as Annex-"L")
20. That the appointment orders of the Mst; Sarwat Lab Assistant is totally fake & factitious one having fake/scanned sign with the bogus dispatch Nos. The same have no record in office register. Two different appointment orders have been made on two different dates. The first order Endst No. 5051-56 dated 13-10-2020 is clearly fake one which is evident from the body of the appointment order where in it is written as "against the post of Certified Teacher (Qari) in (BPS-12/Rs. 13320-960-42120)". While the second order is of the Deceased Son's Quota which is also fake with bogus dispatch No. having no record in the office dispatch register. (Copies attached as Annex - "M", "N")
21. That I also assure in all respect on oath that neither I nor any one of the office of DEO (F) Mardan is involved in this fake & factitious order and it is clearly evident that the entire bogosity is done outside the office to defame the entire office.
22. That I am ready to appear in person to your good office as when and where directed to explain my position in all respect.

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

Dated: 20-1-2022

Yours Obediently

Farzana Sardar
Ex-DEO (F) Mardan
Now OSD:


District Education Officer
(Female) Dera Ismail Khan

18. That it came in to knowledge by the letter of District Account Officer Mardan vide No. DCA/MRD/ADMIN/2020-21/2018 dated 11-11-2020 regarding the status of the Appointment order of Mst; Asma CT.BPS-15. (Copy attached as Annex "K")
19. That after checking the entire record it was conveyed to the DAO Mardan vide Letter No 4970 dated 14-11-2020 by the DEO (female), that the appointment order of the Mst: Asma CT. BPS-15 is totally fake & bogus and is not traceable in the record of the office nor any pay release order has been issued from the office. The pay is also not released to the Mst: Asma CT being bogus appointment. (Copy attached as Annex-"L")
20. That the appointment orders of the Mst: Sarwat Lab Assistant is totally fake & factitious one having fake/scanned sign with the bogus dispatch Nos. The same have no record in office register. Two different appointment orders have been made on two different dates. The first order Endst No. 5051-56 dated 13-10-2020 is clearly fake one which is evident from the body of the appointment order where in it is written as "**against the post of Certified Teacher (Qari) in (BPS-12/Rs. 13320-960-42123)**" while the second order is if the Deceased Son's Quota which is also fake with bogus dispatch No. having no record in the office dispatch register. (Copies attached as Annex - "M", "N")
21. That I also assure in all respect on oath that neither I nor any one of the office DEO (F) Mardan is involved in this fake & factitious order and it is clearly evident that the entire bogosity is done outside the office to defame the entire office.
22. That I am ready to appear in person to your good office as when and where directed to explain my position in all respect.

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

Dated: 20-01-2022

Your Obediently

--Sd--

Farzana Sardar
Ex-DEO (F) Mardan
Now OSD

ڈسپاچر ایجوکیشن آفس ناردان (ڈیوڈن)

10-04-2020 سے 28-07-2020 تک کے سفر نامے

پانڈی کا کوئی نوٹیفیکیشن موصول نہیں ہوا ہے

~~7/11/20~~ اعلیٰ

DISPATCHER

DEO (F) NARDAN ~~7/11/20~~

DISPATCHER

25-01-2022 D.E.O (F) Nardan

164257824891

03443829801

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

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

2) ACCUSED:-

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

3) CHARGES:-

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

5) TOOLS OF THE ENQUIRY

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

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

WHAT DID THE ENQUIRY COMMITTEE OBSERVE.

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

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

WHAT DID THE ENQUIRY COMMITTEE DO.

QUESTIONNAIRES were served upon all the accused.

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

Mst Farzana Sardar

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

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

WHAT DID THE ENQUIRY COMMITTEE SEE REGARDING CHARGES.

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

Charge 1	You have transferred 19 PST, SPST & PSHT (F) in utter violation of the transfer policy.
Reply	That I have served to the best of my ability, dedication, devotion and honesty.
Conclusion	She has transferred 19 (Annexure 1-10) PST, SPST & PSHT (F) in utter violation of the transfer policy Notified on 11.09.2019 vide SO(SM)S&SED/7-1/2019 posting/ transfer/ policy of TC. The same is also available on net. <u>Charge proved.</u>
Charge 2	You have transferred 10, CT, DM, & TT during <u>BAN</u> period, against the policy.
Reply	That I have served to the entire satisfaction of my superiors till date.
Conclusion	She has transferred (04) CT, DM, & TT (Annexure 11-13). <u>Charge Partially Proved.</u>

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	not issued so the <u>Charge Proved</u>
Charge 8	Mst Sumbal D/O, Rehmat khan was inducted as lab Asstt on fake appointment order while you were DEO(F) Mardan.
Reply	That the appointment order of Mst sumbal D/O Rahmat khan is issued before my arrival as DEO(F) Mardan. As I took charge in march 2020, as the same does not bear my signature. The said order was issued on 06.01.2020, however the sign of the then DEO (F) also seems to be the fake/scanned affixed over it along with the bogus dispatch No. Which has no record in the office register. That I also assure in all respect on oath that neither I nor any one of the office of DEO(F) Mardan is involved in this fake and factitious orders and it is clearly evident that the entire bogosity is done out side the office to defame the entire office.
Conclusion	As a matter of facts firstly Mst Sumbal has also been appointed as Laboratory Assistant against deceased son quota vide Endstt #92/G dt 06.10.2020 (Annexure B6) whereas none of her parents is government employee. Nor any one among her parents died during service. The father of Mst Sumbal is Mason. And her mother is house wife secondly the same Mst Sumbal has also again been appointed as subject specialist in Pakistan studies B-17 in GGHS Koper Mardan (Annexure B7)
	Had the then DEO (F) Mst Farzana involoved this duplication would have not happened one hand and Sumbal was appointed in School by Mr Israr JC so <u>Charge Not Proved.</u>
Charge 9	You although knew, signed fake appointment order blindly as you confessed by you.
Reply	That I have not made any statement and confession at any state that I have blindly signed any order. Nor I have been heard by any one as per the law according.
Conclusion	<u>Charge Not Proved.</u>
Charge 10	You, being Ex-DEO(F) Mardan are directly responsible for abetment and negligence in the case of fake appointment.
Reply	That I am not responsible for any kind of abetment and negligence at any stage. As I have thoroughly explained above I took firm action against the one Mst Sarwar Lab Asstt till my presence at that station, ordered an enquiry and forwarded a request for FIR to the DPO. How ever I was transferred from Mardan that is why I was unable to proceed against the others. If I was involoved at any stage I would have not made any actions which clearly show my innocence in this regard
Conclusion	Yes she had done all this as is evident from (Annexure A67) Mst farzana Sardar Ex DEO lodged FIR and wrote to DPO and also ordered inquiry so <u>Charge Not Proved.</u>

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

Replies of Mst Rukhsana Raheem (Annexure E23-E36)

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charge 1/3	You, although not part of district DSC Meetings, yet signed minutes of the meeting for appointments etc.
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Reply

I was just titular part of District DSC Meeting. But DEO Never invited us in any meeting. She did all work related to appointment outside office especially (Misses Hanya) school. One at the meeting minutes of peon DEO requested me to sign paeen meeting minutes although was not involved in any recruitment/ appointment proses. I accepted DEO request at that time senior clerk Sartaj brought meeting minutes for signature. He told that its class four meeting minutes this I sign it. After some time in noticed that he hide Ct meeting copy in it. Fraudulently he take my signature on CT. I complaint about that to honorable Director with reference No 1699 Dated 16/04/2020 when senior Clerk take fraudulently my signature on CT minutes this I informed Director with reference letter no 1748 Dated 07/05/2020. I also forwarded copies to DC Mardan and Manger employee and exchange caved Mardan. Without this card same class four were recruited NAB inquiry was also under process in this matter. This I forwarded a copy to manger employ that I was not involved in any process regarding class.

Conclusion

Reply of the accused apparently seems convincing. As soon as she noticed certain irregularity in the minutes, she immediately complained both in writing and through SMS to the concerned authority for taking remedial measure. **CHARGE NOT PROVED**

Charge 2/4	you did not verify service documents of under transfer employees before activating their salaries.
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Reply

I took charge of DDO and remained DDO wef 12.08.2020 to 30.11.2020 (3 Months 12 days). During the course of this period no under transfer teacher's service documents came to me for verification nor salary activation. all the teachers and clerks appointed or transferred belong to high and higher secondary schools, that have their own DDOs. Mst Farzana Sardar had forbidden me to visit high and higher secondary school (Copy Attached). I remained DDO only for 3 months and 12 days.

Conclusion

Transfer orders placed at B-27 till B-17 have been verified by the DEO (F) Mardan Office, however this does not exclude the possibility of the non verification of other transfer orders which according to verbal complaints are in hundreds. However the charge could not be proved with documentary evidence. **CHARGE NOT PROVED**

	DEO(F) without routing the same through proper channel i.e Superintendent, ADEO both primary and Secondary and Deputy DEO. Charge Not Proved
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Charge 4/6	Mr Israr, fake employee, got inducted with your advent while you were posted as DDEO, Mardan.
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Reply

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

Some one sent me the appointment order of Mst Sarwat. She had been appointed as Qaria in GGHS Shamoza. On 19th october some one upleaded a complaint on citizen portal that DEO is getting Rs50,000/= for each transfer. I wrote on that printed complaint to DEO that her frequent and repeated orders of transfer of teachers had made the condition of the district a worst as 6 schools were closed and 45 school turned to single teacher and also wrote that you have appointed Mst Sarwat as Qaria with out any advertisement and DPC. DEO had seen that letter. And had put her signature and said that she is not afraid of these complaints. On 22nd october a chowkidar called me on phone saying that a girl had been appointed in our school on laboratory assistant. I went to GGHS Kohi Barmol. As the school was far away so I could not reach well in time. I asked chowkidar about the address of Mst Sarwat Lab Asstt. I pressurized her that she will be jailed and FIR will be lodged against her. Sarwat was frightened so she handed over two othe appointment orders one of Qaria and other of Lab Asstt the former had been issued on 13.10.2020 and the latter on 22.10.2020. sarwat went on weeping saying that she is not the sole bogus other bogus have been appointed. My cousin Mst Nusrat CT, Mst Sumbal, Muryam and Asma have also been appointed. When I asked who did issue these orders she said that her order has been issued by Mr Israr JC. Then DEO(F) Mardan ordered an enquiry in the instant case. Sarwat had given in writing to enquiry officer Mr Arshad Hussain that when it was pointed out that the order of Mst Sarwat is bogus, on that day the brother of MPA shokat named younas, who is a clerk in GHS Alo, called Sarwat and her father to MPA Hujra and prssurized them not to name Mr Israr JC, other wise her academic credentials will be spoiled and an FIR will be lodged agains her and she will be jailed. Sarwat had recorded this statement in the office of the

signed by the then DEO(f) Mardan, and I verified it from the DEO (f).

The other two employees iii) Nusrat and iv) Karishma took charge after my transfer from that school. I left the school on 3-9-21 while Nusrat took charge in GGHSS Koper as CT on 5-10-20 and Karishma as lab.assistant on 31-10-21. So the later two cases are not of my tenure.

Conclusion :-

Perusal of the record reveals that appointment order of Mr. Israr was sent to Directorate for verification vide letter no. 457/ dated 17/09/2019 while the verification documents in respect of MST Sumbal could not be traced. Hence non verification of the documents of Mst Sumbal Lab Asst proves negligence of the accused. So far as induction is concerned, Lubna Tauheed is not responsible for induction/appointment. Payments to the Fake employees during her tenure could not be proved.

Mst Nusrat CT took charge on 05.10.2020 after her transfer from that school. Mst Lubna left the school on 3-9-21 while Nusrat took charge in GGHSS Koper as CT on 5-10-20(Annexure B22) and Karishma as lab.assistant on 31-10-21. So the later two cases are not of her tenure **CHARGE NOT PROVED**

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

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

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M. Israr

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

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

Mr Niqab was having one charge in his charge sheet

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

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

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

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

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

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

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

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Conclusion

1) Sumbal has been appointed as Laboratory Assistant (Annexure 262) in GGHS Koper Mardan CC Mr 6254 with other particulars as her CNIC# is 1610297012826, D/O Rahmat Khan P#932174 DOB 12.01.1998 DOA as 08.01.2020 her salaries were being sent to MCB Account #993507011000519 the bank key was 241848 her position code was not known that is why she was given integrated default post her pay is stopped at the moment.

2) The same Sumbal with a bit addition of Sumbal Israr has been appointed (Annexure 263) as SS in GGHS Koper Mardan CC Mr 6254 with other particulars as her CNIC# is 1610297012826, D/O Rahmat Khan P#954100 DOB 12.01.1996 DOA as 05.09.2019 her position code was not known that is why she was also given integrated default position her pay is stopped at the moment.

3) Like Mst Lubna a great many heads of schools don't know the basics of administration, training needs to be given to them before assigning the responsibility of the headship.

4) The committee, in the light of the remarks of Naheed SST GGHS Shamozaï during her personal hearing, decided to call Mr Aqib Imroz JC GGHS Shamozaï Mardan for personal hearing so a letter was issued to him vide Annexure D18, besides that two complaints one annexed as (D1) and the other the remarks of Mst Naheed who verbally stated that Mr Aqib Imroz was cutting deal with people for bogus appointment, her this very statement was fortified by the complaint handed over to the committee by Mr Farhad an aspirant of appointment in education who is now working in police his Mobile #03433093114.

5) Mst Naheed incharge GGHS Shamozaï charged Mr Aqib Imroz for releasing salaries of Mr Sultan Ali Chowkidar GGHS Shamozaï Mr Sultan Chowkidar was served with a show cause (Annexure D21) by the then DEO(F) Samina Ghani and had stopped the salaries of Mr Sultan Ali Chowkidar. But Mr Sultan Chowkidar salaries was released, that annoyed Naheed the incharge and wrote against his clerk Mr Aqib Imroz JC. Mr Aqib Imroz JC was served with a questionnaire (Annexure D22). An appeal/application (Annexure D23) was submitted by Mr Sultan Chowkidar accompanied by Mr Aqib Ali JC during the course of his personal hearing dated 22.12.2021.

6) The complainant had complained that his other brother had also been appointed in the education department under deceased son quota besides Mr Aqib Imroz (Annexure D1) so his family members Mr Kabir S/O Shah Nazar (2) Zeenat Begum D/O Aimal Khan (3) Aqib Imroz S/O Kabir Khan (4) Izaz Ali S/O Kabir Khan (5) Sameeullah Jan S/O Kabir Khan. The other inquiry already recommended may investigate this charge of 2nd son appointment.

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

Recommendations:-

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

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

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

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

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

a) **Mr Israr Junior clerk GGHSS Koper Banda Mardan**

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

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Handwritten signature/initials

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

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

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

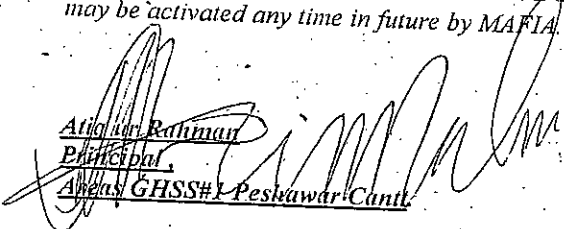
D) Allotting new personal number to Mst Asma CT D/O Farman Ali has been inducted in the system on 13.05.2020 as CT who was also shown as transferred from GGHS Khanori Malakand (Annexure B1,B2) and payment was made to her till 31.10.2020 through P#952808 with CNIC#1610271860676.

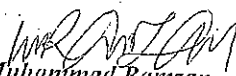
5. Another enquiry may be instituted to investigate :-

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

A

6. It should be made binding upon all the DEOs male and female to Keep a clear cut record of posting transfer and appointment and in no case loose paper orders should be issued. In case of transfer of DEO the DEO in the proximity of the district may be asked to carry out an internal audit of the transfer posting and appointment. The latter will give a certificate to the effect that all the transfer posting and appointment made in the district are on the record.
7. Strict directions may be issued to the DEO (F) Mardan to direct all the Principals especially Principal GGHSS Koper Mardan, not to activate the salaries of Mst Sumbal either as a laboratory assistant with personal number 932174 or as a subject specialist with P#954100, as both are existing on controller general of accounts Islamabad DDOs open filled posts (Annexure D67) and may be activated any time in future by MAFA.


Atiq ur Rahman
Principal,
Area GHSS#1, Peskwar Cantt.


Muhammad Ramzan,
Managing Director, Merged
Education Foundation

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

LIST OF INTER DISTRICT TRANSFER

S.No	Name of Teacher	Desig	From District	To District	Director Order No & Dated
✓1	Elizebeth	CT	GGMS Daug Mula Distrct Mohmand	GGHS Shahzaman Qila	3556-61b dated 12-3-2020
✓2	Zalida Bano	CT	GGMS Ghami.Kor Mohmand	GGHS Madey Baba Mardan	413-16 dated 30-4-2020
3	Aneeta Gul Asad	CT	GGHSS Bazagai Bunner	GGHSS Babuzai Mardan	7071-75 dated 26-6-2020
✓4	Kalsoom Begum	CT	GGMS Zarif Kor Mohmand	GGMS Jalal Mardan	2154-57 dated 19-5-2020
✓5	Faiza Hassan	CT	GGMS Jerai Sahakot	GGMS Arabi Banda Mardan	9225-29 dated 15-4-2020
✓6	Ambareen Inam	CT	GGMS Musazai Peshawar	GGMS Eidgah Mardan	902-6- dated 31-7-2019
✓7	Asmat Naz	DM	GGMS Daug Mula Distrct Mohmand	GGMS Halki Banda (Mardan)	No,4975-81 dt 21-5-2020
✓8	Suitana Begum	PET	GGMS Kotki Charmang Bajaur	GGMS Tora Baz Killi Mardan	2839-44 dated 12-6-2020
✓9	Nadia Kousar	AT	GGHS Panjman Sawabi	GGMS But Seria Mardan	9779-82 dated 23-4-2020
✓10	Hasrat Zamir	CT	GGHS Totai District Malakand	GGHSS Ghala Dher(Mardan)	2889-94 dt 30.06.2020
✓11	Sidra Bashir	CT	GGMS Gulo Shah Malakand	GGHS Lun Khawar Mardan	2877-80 dt 27.07.2020
12	Kalsoom Akhtar	CT	GIICA MPS Adina Swabi	GGMS Sameen Abad	9750-53 dt 22.4.2020
13	Khalida Shah	CT	GGMS Khair Abad Dir Lower	GGHS Kot Jungara Mardan	2382-83 dated 1-6-2020
✓14	Lubna Bibi	CT	GGMS Turmang Dist:Dir	GGHSS Hathian Mardan	1022-26 dt 30.8.2019
✓15	Neelam Habib	CT	GGHS PanjPir Swabi	GGMS Sheikh Maltoon	3509-12 dt 19.09.2019
✓16	Parkha Bibi	CT	GGMS Piran Juligram Mkd	GGHS Qasmi/Moti Banda	2879-82 dt 17.6.2019
17	Shahida zaman	SCT	GGHS Azim Kor District Mohmand		92198-105 dt 25-9-2020

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DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

[Signature]

... Officer Mardan,
... Mohmand,
... Elementary and Se...

... ne 12/3 /2020

To

The Home Secretary of,
Khyber Pakhtunkhwa and Tribal Affairs Department.

Subject: CLARIFICATION

Respected Sir,

The undersigned was transferred from district Kohat to district Mardan on April, 13, 2020 to Nov 2020. (Total 6 Months)

As the undersigned freshly joined a new district there, she started her official work as a routine matter through proper channel from DDEO, Superintendent and clerical staff.

As per the record of the diary/ dispatch of the office there is no notification of ban on transfer at all.

According to the official decorum whenever there is a ban a Whatsapp message is sent to the district office for the record. The undersigned has not received any letter or whatsapp message from the directorate.

So, transfers in the initial period of the undersigned joining were due to misunderstandings and improper communication.

Please proper care will be carried out in the future. It is therefore requested that the allegation leveled against me may be turned down and I may be exonerated from the charges leveled against me.

I will be very thankful for your kindness.

Yours obediently

Miss Farzana sardar
EX (DEO) Mardan.

Now District Education office DI Khan
Date=10-8-2022

Mobile #0333-9665380

District Education Officer
(Female) Dera Ismail Khan

Anx - "G" 52



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the November 24, 2022

NOTIFICATION

No. SO(Inq)ESSED/1-1/2022/Inquiry/DEO (F) Mardan: WHEREAS Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) Lakki Marwat was proceeded against under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. AND WHEREAS Muhammad Ramzan (PCS SG BS-20) Managing Director, Merged Area Education Foundation and Mr. Atiq ur Rehman, Principal (BS-19), GHSS No. 1, Peshawar Cantt. were nominated as Inquiry Committee to conduct Formal Inquiry under the ibid Rules, against Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) Lakki Marwat, for the charges leveled against her.

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

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

5. NOW, THEREFORE, in exercise of the powers conferred under section 14 (5) of the ibid Rules, the Competent Authority (Chief Minister), is pleased to impose major penalty of "Reduction to a lower post for a period of three years" upon Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) Lakki Marwat with immediate effect.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) Mardan & Lakki Marwat.
4. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
6. Section Officer (Schools/ Female), E&SE Department.
7. Section Officer (Management Cadre), E&SE Department.
8. Incharge EMIS E&SE Department.
9. Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) Lakki Marwat.
10. Office order file.



ADDE (F)
31/11

(Bilal Khan) 24/11/22
Section Officer (Inquiries)

Anx - H

To

The Worthy Chief Minister (Competent Authority)

Khyber Pakhtunkhwa, Peshawar.

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Subject: APPEAL/ REVIEW AGAINST NOTIFICATION NO. SO (INQ) ESSED/1-1/2022/INQUIRY/DEO (F) MARDAN DATED: 24-11-2022, ISSUED BY WORTHY SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT, VIDE WHICH MAJOR PENALTY OF "REDUCTION TO A LOWER POST FOR A PERIOD OF THREE YEARS" HAS BEEN IMPOSED UPON APPELLANT.

Respected Sir,

It is very humbly submitted:

1. That the appellant has at her credit unblemished lengthy service record and she has served Govt. with zeal & zest, to the utmost satisfaction of authorities.
2. That when the appellant was posted as DEO (F) Mardan, she was charge sheeted and served with statement of allegations due to incorrect reporting and misconception of facts. Later on, she was unwarrantedly put to Inquiry through an Inquiry Committee constituted under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules 2011. The inquiry report was submitted without fair trial, in absolute departure of prescribed procedure, entirely against the ground realities and the record, as well.
- ✓3. That the Inquiry Committee did not appreciate the fact that the appellant fairly performed her duty as DEO (F) Mardan. When she identified bogus activity of manipulating fake orders, she took the immediate steps to launch inquiries vide Endst: NO. 4902/G dated 09-11-2020 and Endst: NO. 4976/G dated 16-11-2020; besides intimation to DPO for FIR against the culprits vide letter NO. 4985 dated 16-11-2020. Resultantly, the gang of culprits joined hands against the appellant to victimize and get her away from the station. [Copies of the said letters are annexure: A, B, C]
4. That ultimately, having been misled by the null & void inquiry report, major penalty has been imposed upon the appellant, vide the impugned Notification, mentioned in the above subject with necessary details. [Copy of the Notification is annexure: D]
5. That the impugned Notification coupled with all the proceedings prior to it are illegal, based on mala fide, against the law and procedure, in utter infringement of relevant Rules, in absolute violation of settled principles of natural justice and in sheer contravention of constitutionally guaranteed rights of the appellant. Hence, the appellant avails this opportunity to submit before your good self the following grounds for sympathetic consideration.

GROUNDS

- I. That in the above mentioned circumstances, distorted and tainted facts, containing false allegations, were reported to authorities with the ulterior motive to save the actual culprits and make the appellant an escape goat. The impugned inquiry, the proceedings thereafter, and the consequent Notification are therefore malafide, arbitrary, capricious, void ab initio, legally incorrect, factually wrong and based on misjudgment. Hence, not tenable.
- II. That the vague Charge Sheet & the ambiguous Statement of allegation served on the Appellant were deficient and misleading. The inquiry committee was not validly constituted. The inquiry committee did not follow the law & prescribed rules during the proceedings. The appellant was not duly associated with the inquiry proceedings. Evidence was not recorded according to law and the documents collected and referred by the inquiry committee were neither shown nor discussed with the appellant for their correct appreciation. The authenticity and relevancy of the relied upon documents was not ascertained. Irrelevant

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documents were considered and the relevant documents were not considered. The explanation of the appellant was not read by the inquiry committee with attention nor it was given due consideration. It was referred in inquiry report in wrong contexts, without application of mind and was misconstrued. The disputed questions of law and facts emerged in inquiry were ignored, instead of putting them to a fair test of trial. No fair chance of defense was provided to appellant and practically the appellant has been condemned unheard. The inquiry report itself is highly sketchy, unreasonable, biased, non-speaking, unjust, baseless, untrustworthy and totally in violation of Rules. Therefore, the punitive action based thereon has been misjudged. It is devoid of force and not sustainable.

- III. That the appellant was not provided complete inquiry report with the annexed or referred documents nor was she extended personal hearing by the competent authority in accordance with the Rules. As such she has been materially prejudiced during the proceedings. Consequently, the penalty imposed vide the impugned Notification is not sustainable.
- IV. That the appellant is innocent. She has denied all that has been alleged against her. Majority of the allegations against the appellant have not been proved as admitted in inquiry report. The allegations about transfers have been emphatically refuted by the appellant and the inquiry committee instead of understanding the true facts, has adopted incorrect view, without any proof, having been misled by mistaken assumptions, conjectures and surmises. Similarly, the appellant has sternly denied signing any fake appointment but the inquiry committee blamed the appellant without their being genuine, reliable and cogent proof. Hence, the basis being worthless, the impugned Notification is liable to be set aside.
- V. That the quantum of major penalty, viz'-a-viz' the allegations, do not commensurate. The excessive punitive action is too harsh and not sustainable, on this score too.
- VI. That pre and post, each and every step of the proceedings behind the impugned Notification are in violation of recognized principles of natural justice and the fundamental rights relating to fair trial and treatment in accordance with law. The inquiry committee and the competent authority have conceived the inquiry report in vacuum because conclusions have been drawn without there being legal evidence in support of charges and the appellant's legal rights to defend her against the documents referred in the inquiry report, was withheld. Hence, grave injustice has been done to appellant which demands your good-self's attention for her redressal, in the interest of justice and to promote rule of law.

It is, therefore, humbly prayed that the appellant may graciously be given opportunity of personal hearing, she may kindly be exonerated from the charges levelled against her and the impugned Notification may be set aside.




Date: 13 /12/2022.

SE NO
3368
13/12/2022


Appellant

Farzana Sardar
District Education Officer (F)
Lakki Marwat.

Cell # 03339665380

50 روپے	11441	  
ایڈویٹ: سید محی زانہ سعید ایڈووکیٹ		پشاور بار ایسوسی ایشن، خیبر پختونخواہ
بارکونسل / ایسوسی ایشن نمبر: bc-10-8183		
رابطہ نمبر: 03333447222		

بعدالت جناب: سید سبطین حسین کے لیے

مخاطب: ایڈویٹ	دعویٰ: <u>سید سبطین حسین</u>
 فرزانہ سعید داد عدالت عالیہ خیبر پختونخواہ ایڈووکیٹ (ف)	علت نمبر: <u>X</u>
	مورخہ: <u>X</u>
	جرم: <u>X</u>
	تھانہ: <u>X</u>
باعت تحریر آنگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ مقدمہ
 آن مقام عدالت عالیہ خیبر پختونخواہ ایڈووکیٹ سید سبطین حسین کے ذریعے کوالیفیکیشن سے

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا، نیز ذیل صاحب کو
 راضی نامہ کرنے اور ثالث و فیصلہ بر حلف دینے جو ایڈووکیٹ نے قبول اور درخواست از ہیئت کی تصدیق
 کریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف سے یا اپیل کی برآمدگی اور موقوفی، نیز
 دائر کرنے یا اپیل کی برائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کوائف کے ہمراہ یا اپنے اختیار کے لیے لیا جاسکتا ہے اور صاحب
 مقرر شدہ کو کوئی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا سائنچر پر داخلہ منظور و قبول ہوگا
 دوران مقدمہ میں جو چیز چاہے جانے اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد کے
 باہر ہوتو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سہل ہے

(ایڈویٹ فرزانہ سعید داد)

ATTESTED
 Accepted
 Syed [Signature] Adv. Cal
 PESHAWAR BAR ASSOCIATION
 خیبر پختونخواہ ایڈووکیٹس ایسوسی ایشن

مقام
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