

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 990 /2023

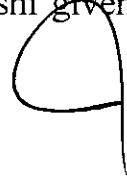
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1-	04/05/2023	<p>The appeal of Mst. Farzana Sardar resubmitted today by Syed Yahya Zahid Gillani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>11/05/23</u>.</p>
11.05.2023		<p>Clerk to counsel for appellant present.</p> <p>Counsel are on strike, therefore, case is adjourned to 20.06.2023 for preliminary hearing before S.B. Parcha Peshi given to the clerk of learned counsel for appellant.</p>

SCANNED  
KFST  
Peshawar

By the order of Chairman

  
REGISTRAR

SCANNED  
KFST  
Peshawar

  
(Kalim Arshad Khan)  
Chairman


\*Mutazem Shah\*

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. <sup>11</sup> 6(e)(ii)(g) proviso of KP Service Tribunal Rule, 1974, and the interest of timely fair justice.

  
Ashraf Ali  
Advocate Peshawar  
415/23

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

Service Appeal No. 990/2023

**SCANNED  
KPST  
Peshawar**

**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.

1

**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 today

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 transferréd 10 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 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.

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- 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 1<sup>st</sup> 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 2<sup>nd</sup> 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 3<sup>rd</sup> 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 4<sup>th</sup> 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 7<sup>th</sup> 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. Asma. 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

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.

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....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.

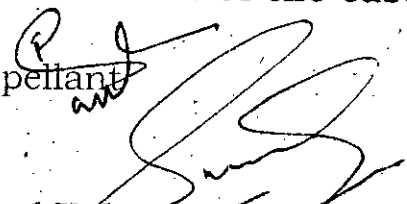
R) That Civil servant who was deprived from his /her original position through arbitrary and whimsical action of the government functionaries and reinstated to his / her original position through judicial order of Service Tribunal would have every right to recover arrears of salaries by way of back benefits 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**

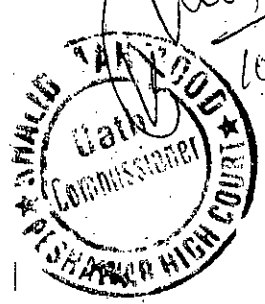
**AFFIDAVIT**

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: 14301-3286890-8  
CEU NO: 03339665380

identified by:  
*Sakir*  
**Syed Munir Zehid Gilai**  
Advocate High Court  
BC NO: 11-15301  
CEU: 03001224999  
CNIC: 17301-519579-5



**OFFICE OF THE**

**ASSISTANT COMMISSIONER SUB DIVISION BETTANI**

Anx - A  
9  
-

Ph No. 0969 538323

Email: [acsdbettani@gmail.com](mailto:acsdbettani@gmail.com)

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

Dated 9 /03/2023

To

The Deputy Commissioner  
Lakki Marwat

Subject:  
Memo

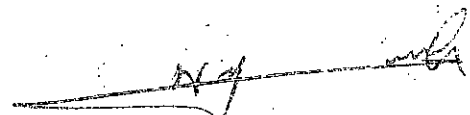
**RECOMMENDATION FOR BEST PERFORMANCE CERTIFICATE**

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.

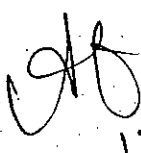
In view of the above, Miss Farzana Sardar DEO(F) Lakki Marwat is hereby recommended for best performance certificate and she may be awarded a best performance certificate in the best public interest.

  
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

20/1

**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.

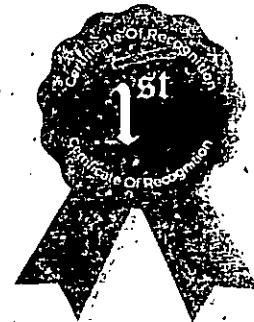
Date: 30-10-2019

*Matiullah*

**Matiullah Khan,**  
Deputy Commissioner, Kohat



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



# Certificate of Recognition

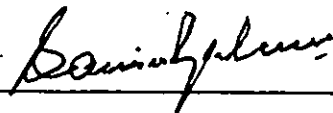
INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of May 2019  
to

**Farzana Sarfar**

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**



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**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.

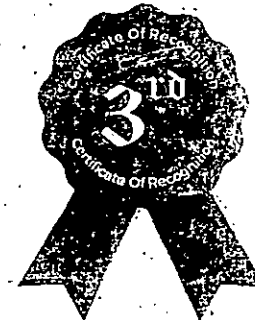
Date: 30-10-2019

*Mafiullah Khan*

**Mafiullah Khan**  
Deputy Commissioner, Kohat



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



23/

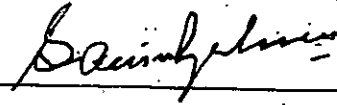
**INTRA-DISTRICT PERFORMANCE SCORECARD**

is hereby awarded for the month of May 2019  
to

**Farzana 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**

24 /

# Certificate of Recognition

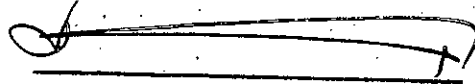
## DISTRICT PERFORMANCE SCORECARD (DPS)

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, Kohi Barmol Katlang.

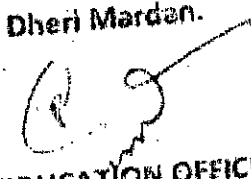
In this regard the following inquiry committee is hereby constituted by the undersigned to inquiry the case and submit their report within three days immediate to proceed for further into the matter.

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

(FARZANA SARDAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

Endst: No. 4802/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, GHS, Katlang Babuzal for the said inquiry.
2. Mr, Arshad Hussain, Principal, GHS, Katlang Babuzal.
3. Mst: Fouzia Azam, Principal, GGHSS, Khazana Dheri Mardan.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

DISTRICT EDUCATION OFFICER  
(FEMALE) (MARDAN)

- 1. Director, Elementary & Secondary Education (Muzik) Puchong
- 2. District Education Officer (Male) Mardani with the request to allow the above named Muzik
- 3. Office for the said inquiry please
- 4. Mr. Ashraf Ali Principal, GHS, Kajang, Mardani
- 5. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani
- 6. Principal, GHS, Kajang Mardani

For further information to the

Form No. 42/5/11  
Date: 18/11/2020  
Inquiry Report Appointments

(FAHANA SARDAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE) (MARDAN)

The following officers are hereby nominated as inquiry officers to conduct the inquiry in connection with the basis of Higher Appointments shall as given below:

1. Mr. Ashraf Ali Principal, GHS, Kajang, Mardani

2. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

3. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

4. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

5. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

6. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

The following officers are hereby nominated as inquiry officers to conduct the inquiry in connection with the basis of Higher Appointments shall as given below:

1. Mr. Ashraf Ali Principal, GHS, Kajang, Mardani

2. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

3. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

4. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

5. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

6. Mr. Ashraf Hussain Principal, GHS, Kajang, Mardani

REVISION

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) (MARDAN)  
PHONE/FAX NO. 03-27-23010  
KUALA BAHARU - 030000

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**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

1/12 (2)

1. Dr. Kazim Niaz, Chief Secretary, Khyber Pakhtunkhwa as the Competent Authority, am of the opinion that, Mst. 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-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

- i. She has transferred 9 female PSI teachers in utter violation of the Transfer Policy.
- ii. She has transferred 10 CTs, DMs and 14 in ban period, against the Policy.
- iii. She has transferred 127 PSIs/SPSIs illegally and irregularly, whose record is not available.
- iv. She has transferred 26 PSIs, TTs, ATs and CTs 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. 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 confirmed by Kurratun Nisrin Lab Assistant.
- x. She, being ex DEO (F) Mardan are directly responsible for appointment negligence in the case of fake appointments.
- xi. She being ex DEO (F) Mardan are responsible for fake appointment of Kurratun Nisrin Lab Assistant.
- xii. She is responsible for fake appointment of Mr. Israr and Mr. Imad.
- xiii. She being ex DEO (F) Mardan are responsible for fake appointment of Mr. Israr and Mr. Imad.

Mst. Sumbal D/O Rahmat Khan



**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 not 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.

SECRET

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Dr. Nazam Nazki, Dr. ... Abdul Kalam ...

... by the ... you ...

... you ...

... policy

... You have transferred ...

... You did not take any action ...

... although you knew the fact

... You although know of fake employees, yet signed their appointment orders

... You ...

... You, being ex DEU ...

... You are responsible for fake appointment of ...

... You, being ex DEU ...

... Mr. ...

... of the ...

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 not 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.

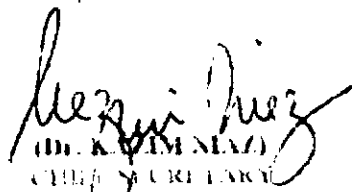
(DR KAZIM NIAZ)  
CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

Mst Farzana Sardar  
Ex-DEO(F), Mardan

(i) Muhammed Ramzan MD.  
 M. H. Fdn. Foundation  
 (ii) Ms Taslim Bejam Principal D.S. 20

The inquiry officer inquiry committee shall, in accordance with the provisions of the rules, provide reasonable opportunity of hearing to the accused, record its findings and submit its report within thirty days of the receipt of this order. Recommendations for 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 in writing.

  
 (Dr. Nazim Raza)  
 CHIEF CLERK  
 MAYBEE, KARACHI  
 DISTRICT HEADQUARTERS

Asst. Fazzana Sardar  
 Dy. D/O (F), Mardan

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 Anmad 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



Better copy

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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 bogosity 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 sated 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 boon 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 this kindness.

Dated: 20-01-2022

Your Obediently

--Sd--

Farzana Sardar  
Ex-DEO (F) Mardan  
Now OSD

ڈیسپچر ایجوکیشن آفیسر ماردان (مردان)

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

لاہور کی گاڑی نوٹیفیکیشن موصول نہیں ہوا ہے

~~Amjad~~ اٹیٹنڈنٹ

DISPATCHER

DEO (F) MARDAN

~~Amjad~~  
DISPATCHER

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

164257824891

03443829801

Anx-E

1

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

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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 GGHS Kopar Mardan
4. Mst Naheed Ex- incharge GGHS Shamoza Mardan.
5. Mst Yasmeen SST (G)Ex-incharge GGHS Koper Mardan.
6. Mr Sartaj S/C o/o DEO (F) Mardan.
7. Mr Nisar S/C GGHS Koper Mardan.
8. Mr Israr S/C GGHS 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 GGHS 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 GGHS Kopar Mardan.(Annexure A4)

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3. *Mst Naheed Ex- incharge GGHS Shamoza Mardan.(Annexure A5)*
4. *Mst Yasmeen SST (G)Ex-incharge GGHSS Koper Mardan.(Annexure A6)*
5. *Mr Niqab Assistant o/o DEO female Mardan.(Annexure A7)*
6. *Mr Sartaj S/C o/o DEO (F) Mardan.(Annexure A8)*
7. *Mr Nisar S/C GGHSS Koper Mardan.(Annexure A9 )*
8. *Mr Israr S/C GGHSS Koper Mardan.(Annexure A10,A11)*
9. *Mr Murad S/C o/o DEO (F) Mardan.(Annexure A12) Including ,*
10. *the siting DEO (F) Mardan.(Annexure A13,A14)*

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

- i. *Mst Hasrat Zuhra DEO (F) Mardan,* under her DDO Ship function schools with cost centre MR6046 wherein 171 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A15 to A20), whereas 04 employees in office MR6391 (Annexure A21) and respective SDEOs:-
  - ii. *Mst Seema Saleem, SDEO (F) Mardan khas* under her DDO Ship function schools with cost centre MR6158 wherein 272 employees had been/are being paid wef 2018-2021 (Annexure A22-A30).
  - iii. *Mst Waheeda Naz, SDEO(F) Takht Bhais* under her DDO Ship function schools with cost centre MR6159 wherein 196 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A31-A38), office MR6029 (Annexure F7-F15)
  - iv. *Principal GGHSS Koper Mardan* under her DDO Ship function her with cost centre MR6254 wherein 10 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 MR 6254 (Annexure A38),
  - v. *Mst Shehnaz Ihsan, SDEO (F) Rustam* under her DDO Ship function schools with cost centre MR6499 wherein 54 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A39 to A40) and office MR6496 wherein 2 employees had been inducted in the system.(Annexure A41).
  - vi. *Mst Shehla, SDEO (F) Katlang,* under her DDO Ship function schools with cost centre MR6439 wherein 23 employees had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A42) MR6412 wherein 01 employee had been/ are being paid wef 01.01.2018 to 31.10.2021 (Annexure A43).
2. *Each one of the above 5 officers were given 20 certificates(Annexure A44 to A47) four each for owning disowning the employees of their respective two cost centers, the list of which had been sent to them.*
  3. *One of the list of cost centers had been provided by the office of DEO (F) Mardan (Annexure A48-A52).*
  4. *A letter had been sent to DEO(F) Mohmand(Annexure A53) along with a list of (08) employees (Annexure A54) who had been on the pay role of DEO Mohmand and are now on the pay role of DEO(F) Mardan and asked DEO (F) Mohmand to convey the mode of their recruitment in Mohmand and mode of transfer to Mardan and also the mode of promotion of Mst Shaheen Aslam CT/SST.Mst Riaz Begum DEO(F) Mohmand disowned Mst Shaheen Aslam CT stating that she has no record in Mohmand district and submitted report on whatsapp (Annexure D19). The committee went to Mohmand asking DEO(F) to verify Mst Shaheen Aslam CT/SST record from accounts office Mohmand as the whatsapped letter had no sign. Mst Riaz Begum owned remaining Seven Employees(Annexure D20), and owned Mst Saheen Aslam CT(Annexure E5) admitting that Mst Shaheen*

*Amrullah*



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 (Annexure E10) of non teaching staff.
  - b) Mr Imrad JC GGHS Moti Banda Mardan (Annexure E11) for clarification of fake appointment of Asma CT, Maryam SST and Azra CT.
  - c) Mr Roohullah B&A officer & Mr Fawad KPO (Annexure E12) for fake appointment of Naeema Shaheen and her sisiter & Mst Salma Shaheen.
  - d) Mr Liaqat legal Advisor for office of DEO(F) Mardan (Annexure 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 (Annexure 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 (Annexure E14).
  - f) DEO(F) Mardan had also informed them all through the letters (Annexure E16-E19).
  - g) Mr Roohullah B&AO has submitted his statement requesting for exoneration with out informing the committee of the actual position. (Annexure E20).
  - h) Mr Mohammad Imran Ex-JC has submitted his statement. (Annexure E21).
  - i) Mr Fawad KPO has submitted his statement. (Annexure E22).

**WHAT DID THE ENQUIRY COMMITTEE SEE REGARDING CHARGES.**

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

Charge1	You have transferred 19 PST, SPST & PSHT(F) in utter violation of the transfer policy.
Reply	That I have served to the best of my ability, dedication, devotion and honesty.
Conclusion	She has transferred 19 (Annexure 1-10) PST, SPST & PSHT(F) in utter violation of the transfer policy Notified on 11.09.2019 vide SO(SM)S&SED/7-1/2019 posting/ transfer/ policy of TC. The same is also available on net. <b>Charge proved.</b>
Charge2	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). <b>Charge Partially Proved.</b>

**ATTESTED**

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

Charge 5	You did not take action in time thus facilitated fake induction.
Reply	Ordered an enquiry and forwarded a request for FIR to the DPO however I was transferred from Mardan that is why I was unable to proceed against the others, if I was involved at any stage I would not have made any action which clearly show my innocence in this regard
	Yes she had done all this as is evident from (Annexure A67) . <b>Charge Not Proved</b>

Charge 6	You did not take any action against Mr Israr & Mr Imad fake employees, although you knew the fact.
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Reply  
That the appointment of Mst Karishma Shah lab assistant is also fake and factitious appointment have my fake /scanned sign. As the fake dispatch #5690/G having date 26.10.2020 on the appointment order this is bogus and has no record in the office register. This is also evident from the office register that the dispatch number is in continuation was 4623/G on 22-October-2020 while in start of November 2020 4902/G. that is why the salary of Mst Karishma was not drawn being the fake order copy attached as annexure "G"

Conclus ion. Mr Israr JC in himself is a MAFIA having ties with other connected offices but solid proof to that effect were not available so the **Charge Not Proved.**

Charge 7 You although knew of fake employees, yet, signed their appointment orders.

Reply

That after checking the entire record it was conveyed to the DAO Mardan vide letter #4970 dt 14.11.2020 by the DEO (F) that the appointment order of Mst Asma CT, B-15 is totally fake and bogus and is not trace able in the record of the office. Nor any pay release order has been issued by the office. The pay is not release to Mst Asma CT being bogus appointment. (Copy attached as annexure L)

Conclus ion Three appointment orders have been issued in respect of 1<sup>st</sup> Mst Asma CT has been shown as transferred from GGHS Khnori Malakand vide Endstf # 31430-35 dt 14.09.2020. (Annexure B2) 2ndly Mst Asma CT has also been shown as appointed through NTS by Scoring 127.42 Endstf # 1704/G. (Annexure B2a) thirdly Mst Asma CT has also been shown as appointed through NTS by Scoring 127.42 Endstf # 1706/G dt 11.05.2020. (Annexure B2b) Mst Asma possesses three order one her transfer and two her appointment orders. Had the DEO involoved triple orders would have

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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 GGHSS 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

ATTESTED

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

**Conclusion**

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

Charge 12	You are responsible for fake appointment of Mst Asma CT.
Reply	That after checking the entire record it was conveyed to the DAO Mardan vide letter #4970 dt 14.11.2020 by DEO(F) , tha the appointment order of Mst Asma CT, BPS-15 is totally fake and bogus and is not traceable in the record of the office nor any pay relaease order has been issued frok the office. The pay is not released to Mst Asma CT being bgus appointment.
Conclus ion	Mst Asma CT salaries had been issued under P#952808 but the activation of salries in respect of (1)Mr Imad JC in GGHS Moti Banda. (2) Mst Resham in GGHSS Katti Garhi (3) Mst Karishma Lab Asstt and (4) Mst Sarwat lab asst in GGHSS Koper were stopped because of the initiation of inquiry and lodging of FIR <b>Charge Not Proved.</b>
Charge 13	You being Ex-DEO(F) Mardan are responsible for induction of fake employee of Mst Sarwat Lab Asstt.
Reply	That I am not responsible for any kind of abetment and negligence at any stage as I have thoroughly explained above I tok firm action against the one Mst Sarwat Lab Asst till my presence at the station. Ordered an enquiry and fowarded a request for FIR(Annexure A67) to the DPO however I wass transferred from mardan that is why I was unable to proceed against the others, if I was involved at any stage I would not have made any action which clearly show my innocence in this regard.
	<b>Mst Sarwat had had been shown appointed in GGHSS Koper Mardan but payment not made Charge not proved</b>

## 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 paean meeting minutes although was not involved in any recruitment/ appointment proses. I accepted DEO request at that time senior clerk Sartaj brought meeting minutes for signature. He told that its class four meeting minutes this I sign it. After some time in noticed that he hide Ct meeting copy in it. Fraudulently he take my signature on CT. I complaint about that to honorable Director with reference No 1699 Dated 16/04/2020 when senior Clerk take 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**

**ATTESTED**

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

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

Conclusion	The accused was not on good terms with Mst Farzana Sardar, the then DEO (F) Mardan and had been excluded from the official hierarchy in the office of DEO (F). In fact most of the documentary documents reveals that most of the files were submitted by Mr. Sartaj dealing assistant for AT, DM, Qaria, -----direct to MST Farzana Sardar
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	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 perform any official duty. DEO(F) Mardan was doing all the posting transfer through clerks. Allah is witnessed that I did not know whether Mr Israr is genuine or bogus. I have seen him in the office of the Higher secondary school Katlang. I have seen him at various places with the Miss Rabia, head mistress GGHS Moti Banda. Collection of cheques authority had been issued to Mr Israr JJC by Mst Rabia I/C GGHS Kotkey. Mr Israr service card had also been signed by Mst Rabia. The service card of other bogus clerk Mr Imad JC also bears the signatures of Mst Rabia. Other two sisters of Bogus clerk Mr Imad JC named Mst Azra CT and Mst Maryam SST had also been appointed by Mr Israr JC. The cheque collection authority in respect of Mst Asma CT had also been issued by Mst Rabia to bogus Imad JC. I intervened well in time and stopped the cheque in treasury. Mst Rabia is supporting all the bogus Mr Israr, Mr Imad JC and Asma CT. When Mst Rabia is in Kotkey Mr Israr is accompanied by her and when she comes to GGHS Moti she draws the salary of Bogus Asma CT. I find out these bogus appointees in the way described below:-

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

~~ATTESTED~~

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

conclusion	<i>The accused was not on good terms with Mst Farzana Sardar, the then DEO (F) Mardan and had been excluded from the official hierarchy in the office of DEO (F). In fact most of the documentary documents reveals that most of the files were submitted by Mr. Sartaj dealing assistant for AT, DM, Qaria, -----direct to MST Farzana Sardar DEO(F) without routing the same through proper channel i-e Superintendent, ADEO both primary and Secondary and Deputy DEO. Charge Not Proved</i>
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***Lubna Tauheed A questionnaire (Annexure A4) had already been served upon Lubna comprising of 10 questions including those questions reflected in the charge sheet. Mst Lubna replied (Annexure B15-B21) by her as follow. The first 5 charges are reflected in the charge sheet.***

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

***Reply :-***

*I did not allow four employees, I allow two namely Israr & Sumbal after following proper procedure of verification from the concerned office (DEO F). (Annexure C71)*

*Among the fake employees only two -i) Israr as J/c (Annexure A98) and ii) Sumbal as laboratory assistant took charge in GGHSS Koper. (Annexure B6) The transfer order of Israr was from Directorate Peshawar that I received through post and I send it for verification to DEO(F) Mardan. The verification from DEO (F) was also received through post. Once verified from the concerned quarter I had no reason to refuse giving charge.*

*Similarly Sumbal had also an appointment order (appointed in deceased quota)*



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

The other two employee iii) Nusrat and iv) Karishma took charge after my transfer from that school. I left the school on 3-9-21 while Nusrat took charge in 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. Therefor Nusrat should excluded from charge sheet.(Annexure C71), I did not adjusted any fake employee, as I was/am not the appointing authority.
Conclusion	Same as conclusion of charge .1 <b><u>ChargeNot Proved.</u></b>

Charge 3/5	You being prinnicipal of GGHSS Koper Mardan, neither demanded orignial 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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**ATTESTED**

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

<b>Charge 4/6</b>	You being EX-Principal GGHS Koper Mardan are directly responsible for etment andab negligence in the case of fake appointments
<b>Reply</b>	Allegation 5 is not related to me because I never performed duty as DEO (F) Mdn. (Annexure C72). Nusrat took charge(AnnexureB22)in GGHS Koper after my transfer from that school. The then incharge miss Yadmin gave her charge. I did not gave her charge.
<b>Conclusion</b>	
Same as conclusion of charge 1. <b><u>ChargeNot Proved.</u></b>	

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

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

**Only one question first was included in the charge sheet**

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

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 (AnnexurB23 ) 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(AnnexureB2a) 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. <b>CHARHE NOT PROVED</b>

*Handwritten signature and name: Mr Israr JC*

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

**ATTES. LU**

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

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

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

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

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

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

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

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

**ATTESTED**

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

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

Conclusion

1) Sumbal has been appointed as Laboratory Assistant (Annexure 262) in GGHSS Koper Mardan CC Mr 6254 with other particulars as her CNIC# is 1610297012826, D/O Rahmat Khan P#932174 DOB12.01.1998 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 GGHSS Koper Mardan CC Mr 6254 with other particulars as her CNIC# is 1610297012826, D/O Rahmat Khan P#954100 DOB12.01.1996 DOA as 05.09.2019 her position code was not known that is why she was also given integrated default position her pay is stopped at the moment.

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

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

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

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

ATTESTED

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*[Handwritten signature]*

*[Handwritten signature]*

7) When asked about Mst Azra CT (Annexure D2), the bogus appointee in GGHS Shamoza Mr Aqib Imroz JC also disowned (04) employees that were on the pay role of GGHS Shamoza mardan, so a letter was written to DAO Mardan for the detail of payment made to them (Annexure D25) beside the detail already sent by DAO (Annexure D2, D26).

8) Aqib Imroz JC shared his staff statement and vacant positions (Annexure D27, D28).

9) Aqib Imroz JC says that he was kept in dark while activating the salaries of Mr Sultan Chowkidar, and Mst Azra CT (Annexure D29). this clearly reveals that he is involved in the activation of salaries of both Mr Sultan and Mst Azra CT.

10) Mst Azra CT GGHS in Shamoza with P#952810 is not existing in the controller general of accounts pakistan islamabad DDOs open and filled posts in Shamoza (Annexure D93)

11) Mst Farzana Sardar had included Mst Rukhsana Raheem DDEO in the DPC from SPST to PSHT and had also collected the sign of the latter over the minutes (Annexure D31 to D36) it is a matter of grave concern that Mst Rukhsana being local and having ties with locals made cutting in the promotion and adjustment making the situation from bad to worse as the deserving teachers were annoyed so the Mst Farzana Sardar DEO(F) constitute a committee headed by GGHS No.2 Hoti Mardan so ameliorate the problem of wrong adjustment shown in the order (Annexure D37 to D41). As a consequence of this corrigendum was issued (Annexure D42).

12) Mst Rukhsana Raheem DDEO was a part of the process as is evident from note sheet (Annexure D43-44).

13) The incharge DEO(F) Mardan Mr Idrees had written a complaint (Annexure D45) to Director E&SE KP that Mst Rukhsana Raheem was a part of the DSC but she latter erased her signs that made the documents suspicious.

14) Mst Rukhsana Raheem DDEO was also a part of CT appointment (Annexure D46-47)

15) Mst Rukhsana Raheem DDEO has really cut her signatures (Annexure D48)

16) Mst Farzana Sardar DEO(F) has made Mst Rukhsana Raheem DDEO as part of every committee of departmental selection viz viz for CT (Annexure D49-50) for TT (Annexure D51-52).

17) Mst waheeda Naz SDEO(F) Takht Bhai has replied (Annexure D53-64).

18) Mst Shehla SDEO(F) Kallang has replied (Annexure E3-4).

19) It is to the astonishment of enquiry committee as to how a single teacher Mst Sumbal is being allotted two personal numbers one personal number 932174 as



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

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

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

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

23) Mst Nasira PST (Annexure A84) GGPS Ahmad Saeed Kot Distt North Waziristan had been shown as transferred to GGPS Alam Koroona Lond khwar Mdn vide order #4228-32/34 dt 22.02.2020. The committee scrutinized its papers(annexure D94-D100) and record its observations. DEO(F) Mardan has issued three letters vide her #2187,2188,2189 on 15.06.2020 (Annexure D94,95,96) to three different offices DEO(F) NWD, DAO NWD and Director E&SE KP respectively. Among these letters DEO NWD responds on 17.06.2020 vide #5827 and receives in the office of DEO(F) Mardan on 22.06.2020 whereas the same has been marked to ADEO Primary on 20.06.2020(Annexure D97). The DAO had already been addressed by DEO(F) Mardan for verification of LPC vide her #2188 dt 15.06.2020 who responded with no stamp and number (Annexure D98-99) and Mst Farzan Sardar released her salaries (Annexure D100). it needs further verification as to the said teacher is genuine or otherwise.

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

ACCEPTED

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

S#	Name	P#	Salary drawn	Cummulative total	Period	Inactive wef
1	M.Israr JC B-11 GGHS Koper Banda	926 918	Rs411318(19m onths)	Rs411318 /=	01.06.2019 to 31.12.2020	01.01.2021
2	Nusrat CTB- 15GGHS Koper Banda	953 073	Rs55332(2Mon ths)	Rs466650 /=	01.10.2020 to 30.11.2020	01.12.2020
3	Sumbal/Asst B-7GGHS Koper Banda	932 174	Rs211490(11M onths 24days)	Rs678140 /=	088.01.2020 to 31.12.2020	01.01.2021
4	MaryamSST B-16GGHS Koper Banda	932 315	Rs688144(21m onths)	Rs136628 4/=	01.04.2019 to 31.12.2020	01.01.2021
5	Sumbal Israr SSGGHS Koper Banda	954 100	Rs102832/=	Rs149611 6/=	05.09.2019 to 30.11.2020	01.12.2020
6	Azra CT GGHS Shamozai	952 810	Rs521880/=	Rs199099 6/=	01.06.2019 to 30.11.2020	01.12.2020
7	Asma CT GGHS Moti Banda	952 808	Rs162744/=	Rs215374 0/=	13.05.2020 to 31.10.2020	01.11.2020

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

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 1<sup>st</sup> in case of appointing himself bogusly through transfer from GGHSS Khanori Malakand where there is no Girl Higher secondary school, and 2<sup>nd</sup> FIR each in case of direct induction of Mst Nusrat CT GGHSS Koper Mardan 3<sup>rd</sup> Mst Sumbal Lab Asstt GGHSS Koper Mardan 4<sup>th</sup> Mst Maryam SST GGHSS Koper Mardan 5<sup>th</sup> for appointing Mst Sarwat as Lab Asstt GGHSS Koper 6<sup>th</sup> 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 GGHS Koper Mardan village Moti Banda lund khwar takht bhai mardan The calculated amout is his own illegally drawn salaries for (19) months wef 01.06.2019

**ATTESTED**

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*Mst Farzana Sardar*

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

**b) Mst Nusrat CT GGHS Koper Mardan**

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

**c) Mst Sumbal LabAssit GGHS Koper Mardan**

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

**d) Mst Maryam SST GGHS Koper Mardan**

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

**e) Mst sumbal israr SS GGHS Koper Mardan**

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

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

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

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

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

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

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

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

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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.

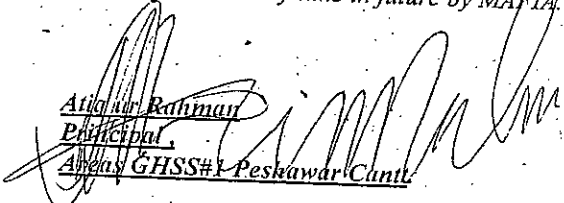
5. Another enquiry may be instituted to investigate :-

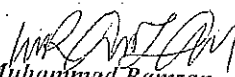
- Further Involvement of Mr Aqib imroz JC GGHS Shamozaï Mardan besides that reported in the light of the complaint annexed as (D1,D9) ..Mst Naheed verbally stated that Mr Aqib Imroz was cutting deal with people for bogus appointment, her this very statement was fortified by the complaint handed over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

~~ATTESTED~~

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

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

  
Arif ur Rahman  
Principal,  
Agency GHSS#1 Peshawar Cantt.

  
Muhammad Ramzan,  
Managing Director, Merged  
Education Foundation

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ANX-F

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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 District 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	Kaloom 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 District Mohmand	GGMS Halki Banda (Mardan)	No,4975-81 dt 21-5-2020
✓8	Sultana 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	Kaloom Akhtar	CT	GJICA 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

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To

The Home Secretary of,  
Khyber Pakhtunkhwa and Tribes 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 sarfraz  
(female) District Education Office  
EX (DEO) Mardan.

Now District Education office DI Khan

Date=10-8-2022

Mobile #0333-9665380

Anx - "G"

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REGISTERED



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)

3/11

(Bilal Khan)  
Section Officer (Inquiries)

Anx - H

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To

The Worthy Chief Minister (Competent Authority)

Khyber Pakhtunkhwa, Peshawar.

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.

SEND  
3368  
13/12/2022


Appellant

Farzana Sardar  
District Education Officer (F)  
Lakki Marwat.

Cell # 03339665380

قیمت 50 روپے	11441			
ایڈوکیٹ: <u>سید محی زانہ سعید ایڈووکیٹ</u>		 پیپٹا اور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل/ ایسوسی ایشن نمبر: <u>bc-10-8183</u>				
رابطہ نمبر: <u>03333447222</u>				

بعدالت جناب: سید مس ریحون بیگم

منجانب: <u>ایڈووکیٹ</u>	دعویٰ: <u>سید مس ریحون بیگم</u>
 فرزانہ سعید ایڈووکیٹ ایڈووکیٹ ایسوسی ایشن ایسوسی ایشن نمبر (۴)	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 میں  
 آن مقام لٹریچر کے لیے سید مس ریحون بیگم اور ایڈووکیٹ ایسوسی ایشن کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کر کے وکیل ثالث و فیصلہ بر حلف دینے جو اب دعویٰ اقبال دعویٰ اور درخواست از حرم کی تصدیق کے  
 زیر پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے یا اپیل انگریزی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ مانگنے کے لیے مقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا سزاخستہ پر داخستہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو چیز چاہے جانے اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حادثے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند سے  
 اس کا  
 Accepted  
 Syed  
 Advocate

0332-9931676  
 A.S.I  
 BC#10446  
 72288  
 CMC#14901

(ایڈووکیٹ فرزانہ سعید)

ATTESTED

PAKISTAN BAR ASSOCIATION  
 PUNJAB BAR ASSOCIATION  
 HYDERABAD BAR ASSOCIATION

سید ریحون بیگم کے لیے منظور ہے۔  
 مقام  
 ایڈووکیٹ  
 فرزانہ سعید

نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔