

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No
108/2023

Fazal Wahid Ex.DM S/O Haji Abdul Hai GMS Khan Abad KOHISTAN LOWER

APPELLANT

VERSUS

1. District Education Officer (M)Kohistan Lower
2. Director E & SE Khyber Pakhtunkhwa, Peshawar.
3. Govt.of Khyber Patunkhwa through Secretary E & SE Khyber Pakhtunkhwa, Peshawar.
4. Deputy Commissioner Upper Kohistan the then District Coordination Officer Dassu Kohistan.
5. District Account Officer, District Lower Kohistan.

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1-3

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Date of hearing

26.09.2023

A Abad

District Education Officer (M)
Kohistan Lower
Respondent No.1-3

①

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APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6459

Dated 13/7/2023

VERSUS

1. District Education Officer (M) Kohistan Lower
2. Director E & SE Khyber Pakhtunkhwa, Peshawar.
3. Govt.of Khyber Patunkhwa through Secretary E & SE Khyber Pakhtunkhwa, Peshawar.
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Respected shewed:- that the respondants submits as under.

PRELIMINARY OBJECTIONS

1. That the appellant is not an aggrieved person.
2. That the appellant has been estopped by his own conduct.
3. That the appellant has got no cause of action/locus standi to file the instant appeal.
4. That the appellant has come to this Honorable Tribunal with unclean hands.
5. That the appeal is not maintainable in the present circumstances of the issue.
6. That the appellant has concealed the material facts from this Honorable tribunal.
7. That the appeal is time barred hence liable to be dismissed.
8. That the appellant is not a civil servant as he has got his appointment through fake and bogus appointment order, even now he has not gotten required qualification for the post of DM.
9. That the appeal is barred by law and limitation.

FACTUAL OBJECTIONS

- 1) That the Para No.1 is incorrect, strongly denied with the facts that Mr. Fazal Wahid S/O Abdul Hai was appointed by office of district Coordination officer Kohistan upper as Drawing Master at GMS Bar Bela Kohistan Upper Vide No. 7824-3 dated 13-08-2007 in BPS 09 while the DCO was competent for appointment at District level for posts in BPS 11 to 15 vide notification of Govt of Khyber Pakhtunkhwa establishment and Admin: Department (Regulation Wing) No.SOR-V (E&AD)2-7/2003,Peshawar the 17th November 2005 the subject appointment was not under domain DCO in the light of above referred notification. (Notification is annexed as annexure A)

Whereas, during the verification of appointment order from deputy commissioner Kohistan upper, he stated that appointment order mentioned above is FAKE AND BOGUS vide his letter No. 1113-14/DC-(KH) dated 30-01-2020, and the subject case does not fall under the domain of DCO Kohistan. (Letter is annexed as annexure B)

Whereas the recruitment policy at that time the required qualification for the DM Post was HSSC and DM Diploma, but the above named teacher has not acquired the qualification up till now. (Recruitment policy is annexed as annexure C) .It is clear that Mr. Fazal Wahid DM has Low qualification as compared to the required qualification for the post of DM and Inquiry officer recommended major penalty of removal from service. (Inquiry report dated 28-12-2019 is annexed as annexure D). And now, the required qualification for the DM Post is BA+ 09 Months in service mandatory Professional training at RDPC/DPD but the appellant has not acquired the same qualification up till now as the appellant has only passed HSSC in session 2021 while his appointment was 13/08/2007. (Fresh Qualification for DM post is annexed as annexure E).

Whereas this office verified his academic documents available in his service book, from BISE Abbottabad, SSC Vide No. 819 dated 24-07-2019 BISE Vide No. 412/F/SSC/SECRECY dated 13.09.2019 and HSSC vide No. 866/AB/BISE/HSSC/SECRECY Dated 17-09-2019 Abbottabad, Received by this office on 03-10-2019 declared as FAKE AND BOGUS. (Certificates are annexed as annexure F). Its means that at the time of appointment the appellant has not passed any certificate i.e. SSC & HSSC.

- 2) That the Para No.2 is incorrect, strongly denied with the facts that as per record of his service book at page No. 5. He was appointed at GMS Bar Bela Jalkot 13-08-2007 and source-I was verified by DAO Kohistan for activation of his pay on 21-10-2011 after a period of more than 04 years after his appointment is unjustified. (Service Book Pages are Annexed as Annexure G).

It is worth mentioning here that the appellant was appointed on 13-08-2007 while the record of his medical certificate available in his service book shows that the medical report was signed by concerned DHO on 23-11-1999 about 08 Years prior to his appointment and original also not found on the record as well as in the DHO Office (Medical certificate is annexed as annexure H)

- 3) That the Para No.3 is strongly denied with the facts that the appeal No. 1404/2020 was allowed and impugned orders passed by authorities are set a side by the Honorable service tribunal Peshawar. Appellant stands reinstated into service for the purpose of de-novo enquiry and case is remitted to the respondent department for holding proper regular enquiry regarding the

allegations leveled against the appellant. For this purpose charge sheet and disciplinary action has been taken by the department and sufficient proof is founded against the appellant. (Charge sheet etc are annexed as annexure I).

- 4) That the para No.4 is incorrect as Muhammad Ashfaq Khan Jadoon District Education Officer (M) Battagram was nominated as enquiry officer to conduct enquiry against the appellant in the light of Honorable service tribunal Peshawar decision in service appeal No.1404/2020. De-nova enquiry was conducted by the same officer on dated 04-01-2022. (Inquiry report is annexed as annexure J). In his recommendations at point No.09, he again referred the same case to competent authority for decision.
- 5) That the para No.05 is incorrect as discussed in para No.4 in factual objections.
- 6) That the para No.6 is incorrect the inquiry officer then was posted as DEO (M) Kohistan Lower, reconstituted inquiry committee for verification of record in continuation of the enquiry conducted by himself, from DEO (M) office Kohistan upper as well as DC Office Kohistan upper. The enquiry committee submitted their report that no record of appointment found in DEO (M) office Kohistan upper, however only dispatch No. exist in DC office Kohistan upper. (Enquiry report dated 05.07.2022 is annexed as annexure K).
- 7) That the Para No.7 is incorrect in view of above facts and suspicious appointment record competent authority is disagreed with the inquiry report and reinstatement order of Mr. Fazal Wahid as reinstated for the purpose of De-Novo inquiry vide No. 9530-36 dated 07-10-2021 is withdrawn with immediate effect and his previous removal order vide No. 1270-75 dated 22-02-2020 is remain intact.
- 8) That the Para No.8 is incorrect, need proof.

GROUNDS:

- a. That the Ground "A" is incorrect, as the office order dated 22-02-2020 passed by respondent No.1 is legal according to lawful authority, hence having great value in the eyes of law, thus the same appeal is liable to be dismissed and further discussed comprehensively in para No 3,4 and 6 in factual objections. .
- b. That the Ground "B" is incorrect as it has been discussed in para No. 1 and 2
- c. That the Ground "C" is incorrect that inquiry committee clearly mentioned in their enquiry report that the appellant was appointed on low qualification and competent authority agreed with the report of enquiry officer nominated by respondent No.2 i-e Mr. Bkhtiar Anjum Principal (B-18) GHSS Paimal Sharif Battagram. As discussed in para No.01 of factual objection.
- d. That the Ground "D" is incorrect as partially discussed in Para No 1 And 2 then the respondent No. 1 is informed by a written application bearing diary

(4)

No.464 dated 18-10-2019 on the basis of this application, action has been taken by department against the appellant.

- e. That the Ground "E" is incorrect department followed the laws, rules and regulations.
- f. That the Ground "F" is incorrect the appellant has appointed on low qualification as well as FAKE AND BOGUS documents and appointed without authentic authority.
- g. That any other ground which has not been mentioned may also be permitted to rise at the time of arguments.

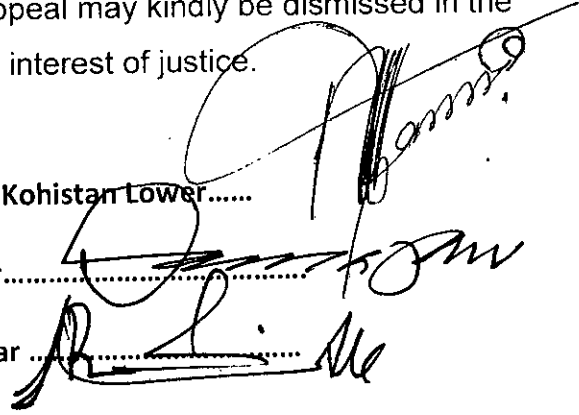
PRAYER:

It is therefore, humbly prayed that on acceptance of the above comments, the instant appeal may kindly be dismissed in the favor of the Respondents in the interest of justice.

1. District Education Officer (M) Kohistan Lower.....

2. Director E & SE KPK Peshawar.....

3. Secretary E & SE KPK Peshawar

Handwritten signatures and initials are present over the list of names. The first signature is a large, stylized cursive signature. The second and third lines have smaller, less distinct signatures or initials written over them.

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4. Deputy Commissioner Upper Kohistan the then District Coordination Officer Dasso Kohistan.
5. District Account Officer, District Lower Kohistan.

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1-3

Affidavit

I Mr. Rahimdad Rahimi Assistant District Education Officer (M) Kohistan Lower do hereby affirm and declared on oath that contents of forgoing comments in service appeal No. 108/2023 are correct and true according to the best of my knowledge, belief and nothing has been concealed from this Honorable Tribunal. *It is further stated on oath that in this appeal, the answering respondents have never neither been placed ex-parte nor their defense have been struck off.*

DEPONENT

Rahimdad
Miss [Signature]
CATHIC [Signature]
Judicial [Signature]

12-07-2023

Attended
Rahimyar Khan Bahimi
(BS-15)
G.P.S. Kohistan

GOVERNMENT OF N.W.F.P.
ESTABLISHMENT & ADMN: DEPARTMENT
(REGULATION WING)

No.SOR-V(E&AD)2-7/2003.
Dated Pesh: the 17th November 2005.

P-2005

To
All District Coordination Officer,
In N.W.F.P.

SUBJECT:- COSTITUTION OF SELECTION BOARD.

Dear Sir,
I am directed to refer to this Department letter bearing No.SOR-V(E&AD)1-2/03 dated 30-7-2003 on the subject noted above and to state that due to amendment in Rule-6 in sub rule 1(b) of District Government Rules of Business 2001 notified vide Local Government, Elections and Rural Development Department No.SO(LG-I)3-196/E.M/05 dated 7-10-2005, the Departmental Selection Committees at District level are reconstituted as under:-

A) DEPARTMENTAL SELECTION COMMITTEE AT DISTRICT LEVEL FOR POSTS IN BS-11 TO BS-15.

- | | | |
|------|---|----------|
| i. | DCO. | Chairman |
| ii. | EDO concerned. | Member |
| iii. | One member to be nominated by the Admn: Deptt: concerned. | Member. |
| iv. | One member to be nominated by the Appointing Authority. | Member. |

B) DEPARTMENTAL SELECTION COMMITTEE AT DISTRICT LEVEL FOR POSTS IN BS-1 TO BS-10.

- | | | |
|------|---------------------------------------|-----------|
| i. | EDO concerned. | Chairman. |
| ii. | One member to be nominated by the DCO | Member. |
| iii. | District Officer concerned. | Member. |

Am Bx/A
Deco
30/11/05

Yours faithfully,

(MUSHARAF KHAN)
SECTION OFFICER (R-V).

17/11/05
District Coordination Officer
Duty No. 4402
17/11/05
KOHISTAN *

Endst: of even No & Date.

Copy forwarded to:-

All Administrative Secretaries to Govt. of NWFP.

(M)
SECTION OFFICER (R-V).

OFFICE OF THE
DEPUTY COMMISSIONER
KOHISTAN AT DASSU

No.21 /Estt: / 11/2 /DC (KH)

Dated 32 / 01/2020

Rahim Dad Rahim

GHS Banil Jag 7002 Fax No.0998407001 Email: dckohistan321@gmail.com

Mr. Muhammad Nawab. (Inquiry Officer),
SDEO (M), Pattan,
Lower Kohistan.

P-87

Subject: - CLEARANCE OF FACTUAL CONTROVERSY OF THE OFFICE
DISPATCH RECORD AND OF THE STATEMENT

Reference your memo No.2823 dated 6/1/2020, on the subject noted
above.

In this connection the undersigned has already provided the requisite
record as well as factual position to the inquiry committee vide this office letter
No.21/Estt:/15166/DC KH dated 24/12/2019.

It is, once again stated that this office has no any kind of record
regarding appointments of these individuals and the subject case does not fall under
the domain of Deputy Commissioner Kohistan and at that time the then DCOs were
declared the chairman of District Selection Committees for BPS 11 to 15, vide
Notification No. SOR-V(E&AD)2-7/2003 dated 17/9/2005. However the codal
formalities i.e clarification of vacant post, Advertisement for fresh appointment,
collection of application, their list maintenance, short listing, and conduction of their
test, DSC committee Notification, circulation of agenda copies for DSC to all notified
members before the fixation of DSC meeting, and preparation/maintenance before and
after DSC/DPC of all that record, was the responsibility of parent/concerned
Department.

It is once again brought in to your notice that if proper procedure/basic
requirement before and after DSC/DPC is not adopted for the selection, which is
~~mandatory such orders will be considered null and void or take and bogus.~~

Besides this, you are directed to avoid direct correspondence with
undersigned. However, proper channel may be followed for correspondence.

Deputy Commissioner,
Kohistan at Dassu

No. 1113-14 /DC (KH)

Copy forwarded for information to the :-

1. Additional Deputy Commissioner (G) Kohistan.
2. District Education Officer (M) Kohistan Lower w/r to this office
letter No.21/Estt:/11102-4 dated 26/09/2019.

ADDO (Sui)/AE

Deputy Commissioner,
Kohistan at Dassu

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RECRUITMENT POLICY FOR VARIOUS CATEGORIES, 2003.

Annexure-6C 99

Recruitment Notification No. SO(s) 6-2/98/Service Rules dated 15.1.1979. The salient features of recruitment policy are:

Attended
P

Rahim Ullah
G.H.S.B. Kohistan

P-9

1. Qualification.

- i) SV/OT/CT:- HSSC from recognized Board with SV/OT/C.T certificate or an Equivalent Certificate.
- ii) PET:- HSSC from recognized board with HDPE or an equivalent Diploma.
- iii) ~~SSC with Sand Paragh from a religious institution recognized by the Government.~~
- iv) T.T:- SSC with Sand Paragh from a religious institution recognized by the Government.
- v) Qari:- SSC with Qirat Sanad from a religious institution recognized by the Govt.
- vi) A.T:- i. Sanad in Darsi Nizam;
ii. Honour in Arabic.
OR
Shahadt-ul-Alamia
OR
Equivalent Qualification from a recognized institution.

2. Age.

- i. CT
- ii. DM
- iii. PET
- iv. TT 18-33 Years.
- v. Qari
- vi. AT

3. Age Relaxation.

Vide Notification No. SOR-VI (GAT 1-10/2003, dated 9.8.2003).

i. Relaxation in upper age limit of 5 years by Department.

ii. For 10 years by Establishment Department.

iii. Vide Notification No. SR-V (E2 D.11/10/2003/1. (Date 9.1.2003) pgs. 26 & 27 it is directed by Government for initial recruitment. It will be valid up to 31.12.2004.

4. Quota.

- i. 75% batchwise year-wise and 2% open merit for CT/PET/DM.
- ii. Open merit for TT, Qari & AT.
- iii. Disable Quota 2% of 75% and 2%.

Signature
Assistant Director
Educational
Services

19/12/19

4/2/03

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13-2-2020

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Annexure D

C

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

No. 121/File.INQ/2019

Dated, 28/9/2019

Attested
Rahim Ullah Rahimi
GMS (BPS-16)
Kohistan Lower Kohistan

P- [Signature]

The Director Elementary & Secondary Education,
Khyber Pakhtunkhwa Peshawar

Subject: INQUIRY REGARDING FAZAL WAHID DM GMS KOTHIAN DISTRICT KOHISTAN LOWER

In compliance with your notification bearing Endst: No 3079-82 File. CMD Kohistan/ complaint cell/2018 dated 02.12.2019, the undersigned visited Office of the District Education Officer (M) Kohistan lower on 16.12.2019 and conducted the subject cited above inquiry.

Back Ground:

A complaint had been lodged by Mr. Syed Rahim S/O Mir Alam resident of Pattan Kohistan, to the CM Khyber Pakhtunkhwa, that Mr. Fazal Wahid DM Kothian Pattan Kohistan has been appointed on the basis of fake academic documents and that the teacher remains absent from his duty.

Procedure:

The District Education Officer (M) Kohistan lower had efficiently completed the process of verification of appointment order and academic documents of the teacher. The remaining relevant record was scrutinized and the statements of the Head Master of GMS Kothian (Annex-I) and the teacher under inquiry (Annex-II) were sought.

Finding:

The scrutiny of the relevant record led the undersigned to the following findings.

1. Mr. Fazal Wahid S/O Abdul Hai was appointed by District Coordination Officer Kohistan at Dasso as DM BPS 09 at Govt. Middle school Bar Bela Kohistan upper vide No 7824-30 dated 13.8.2007 (Annex -III)
2. As per entries on Page No.2 (Annex-IV) and Page No.3 (Annex-V) in the service book of the teacher the date of birth of the teacher is 05.01.1983, while he has passed his SSC Examination in 1995. It shows the teacher passed his SSC at the age of 12 years, which is astonishing.
3. The Medical Certificate of the teacher (Annex-VI) attached with his service book has been signed by the medical superintendent on 23.11.1999, about 8 years prior to his appointment.
4. The entries on page 5 of the service book (Annex-VII) discloses that the source- I for activation of his pay was verified by the concerned District Accounts officer on 21.10.2011 after more than 4 years of his appointment.

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2-1-2020

[Signature]

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In response to District Education Officer (M) Kohistan lower, the Deputy Commissioner Kohistan at vide his letter No 21/Estt/11102-4 D(KH) dated 26.9.2019(Annex-VIII), has clarified that appointments in BPS 09 were under the exclusive domain of the Executive District Officer E&SE in 2008 notified by Government of NWFP Establishment & Admn: Department letter No SOR -V (E&AD) 2-2003 dated 17.9.2003 (Annex-IX).

In response to the DEO(M) Kohistan lower letter No 819 dated 24.7.2019 (Annex-X), the BISE, Abbottabad has declared vide No 412/F/SSC Secrecy dated 13.9.2019 (Annex-XI) and letter No: 6/AB/BISE/HSSC/SECURITY Dated 17.09.2019 (Annex-XII) that the DMCs of SSC (Annex-XIII) & HSSC (Annex-XIV) of the teacher concerned were found fake.

The DM course certificate of the teacher was not available in the record. The teacher was of the opinion (Annex-II) that he had been appointed without having professional qualification due to relaxation.

The above mentioned facts have already been reported to your good self by the District Education Officer (M) Kohistan Lower while his letter No. 1008/EST/ENQ/FAKEDOC/DM/DEO(M)KHL Dated 4/10/2019 (Annex-XV)

All the above mentioned blunders in the record and given facts and factors prove that the appointment order as well as the academic documents of the teacher under inquiry are fake.

3. Despite of all the above mentioned blunders in the record the teacher was allowed to carry on his services in the department for about 12 years, which is impossible without the support of officers/officials within the department.

9. As per record of the school (Annex-XVI) and the statement of the HM the teacher (Annex-I) remains present at the school, however the teacher has been reported absent twice by IMU (Annex-XVII).

RECOMMENDATIONS:

If agreed please:

1. Major penalty of removal from service under 4(b) (III) of E&D rules 2011 is recommended.
2. A High level inquiry may be ordered to disclose other such frauds as well as the official/officers involved in such type of fraudulent practices in order to give them exemplary punishment and to clean the department of such type of black sheep.

28/12/2019
BAKHTIAR AN MUHAMMAD ANJUM
PRINCIPAL
GHSS PAIMAL SHARIF, BATTAGRAM.

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13-12-2019

اشتہار برائے بھرتی

محکمہ تعلیمی ایڈمنسٹریشن کی ایکشن پلاننگ ضلع کوہستان لوئر کے زیر انتظام (مردانہ) سکولوں میں درجہ ذیل آسامیاں ایک سالہ Contract/Adhoc کی بنیاد (School Based) پر کرنے کے لئے ضلع کوہستان لوئر کے سکولوں میں امیدواروں سے مجوزہ فارم پر سونہ 15/12/2021 تک درخواستیں مطلوب ہیں درخواست فارم ETEA کی ویب سائٹ (<https://etea.edu.pk/>) پر دستیاب ہے۔ مقررہ تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں، نامی جانے والی دستاویزات اور حاصل کردہ اسناد پر غور نہیں کیا جائے گا۔

(الف) تعلیمی شرائط اور عمر کی تفصیل

1	ی۔ ٹی (BPS-15)	(I) کسی بھی تسلیم شدہ یونیورسٹی سے بیچلر ڈگری۔ (II) سلیکشن اور تقرری کے بعد 9 ماہ کی لازمی ٹریننگ حکومتی اداروں RDPC/DPD سے حاصل کرنی ہوگی۔	35±19 سال
2	ڈی۔ ایم (BPS-15)	(I) کسی بھی تسلیم شدہ یونیورسٹی سے بیچلر ڈگری۔ (II) سلیکشن اور تقرری کے بعد 9 ماہ کی لازمی ٹریننگ حکومتی اداروں RDPC/DPD سے حاصل کرنی ہوگی۔	35±19 سال
3	پی ایچ ڈی (BPS-15)	(I) کسی بھی تسلیم شدہ یونیورسٹی سے بیچلر ڈگری۔ (II) سلیکشن اور تقرری کے بعد 9 ماہ کی لازمی ٹریننگ حکومتی اداروں RDPC/DPD سے حاصل کرنی ہوگی۔	35±19 سال
4	ٹی ٹی (BPS-15)	(I) ایس ایس سی سینئر ڈیویژن کی کسی بھی تسلیم شدہ بورڈ سے مہر شہادۃ العالمیہ فی العلوم العربیہ والا سلامیہ کی بھی مستند تنظیمات یا وفاقات المدارس یا دارالعلوم سید و شریف سوات، دارالعلوم چارباغ، دارالعلوم درویش چترال یا کوئی دیگر دارالعلوم جو گورنمنٹ کے زیر انتظام ہو اور اس کا نوٹیفیکیشن حکومت نے وقتاً فوقتاً جاری کیا ہو یا کسی بھی تسلیم شدہ یونیورسٹی سے ایم اے اسلامیات میں سینئر کلاس ڈگری۔ (II) سلیکشن اور تقرری کے بعد 9 ماہ کی لازمی ٹریننگ حکومتی اداروں RDPC/DPD سے حاصل کرنی ہوگی۔	35 ± 19 سال
5	ای۔ ٹی (BPS-15)	(I) کسی بھی تسلیم شدہ یونیورسٹی سے بیچلر ڈگری مہر شہادۃ العالمیہ فی العلوم العربیہ والا سلامیہ کی مستند تنظیمات یا وفاقات المدارس یا دارالعلوم سید و شریف سوات، دارالعلوم چارباغ، دارالعلوم درویش چترال، دارالعلوم درویش چترال یا کوئی دیگر دارالعلوم جو گورنمنٹ کے زیر انتظام ہو اور اس کا نوٹیفیکیشن حکومت نے وقتاً فوقتاً جاری کیا ہو۔ یا کسی بھی تسلیم شدہ یونیورسٹی سے عربی ایم اے میں سینئر کلاس ڈگری۔ (II) سلیکشن اور تقرری کے بعد 9 ماہ کی لازمی ٹریننگ حکومتی اداروں RDPC/DPD سے حاصل کرنی ہوگی۔	35±19 سال

(ب) سلیکشن کریٹیریا اساتذہ کے سلیکشن کیلئے کریٹیریا درج ذیل ہے۔ کل 200 نمبرات کی تقسیم اس طرح سے کی جائیگی۔

(1) سکریننگ ٹیسٹ پور عتد = ETEA = 100 نمبر (ب) تعلیمی قابلیت = 100 نمبر جس کی مزید تقسیم اس طرح ہوگی

تعلیمی قابلیت	کل نمبر
ایس ایس سی	حاصل کردہ نمبر 20x تقسیم کل نمبر
ایف اے / ایف ایس سی	حاصل کردہ نمبر 20x تقسیم کل نمبر
پی اے / پی ایس سی	حاصل کردہ نمبر 20x تقسیم کل نمبر
ایم اے / ایم ایس سی	حاصل کردہ نمبر 20x تقسیم کل نمبر
پی ایچ ڈی	حاصل کردہ نمبر 05x تقسیم کل نمبر
ایم اے	حاصل کردہ نمبر 05x تقسیم کل نمبر
ایم ٹی	حاصل کردہ نمبر 05x تقسیم کل نمبر
پی ایچ ڈی	حاصل کردہ نمبر 05x تقسیم کل نمبر

پی ایس چار سالہ کورس کی صورت میں نمبروں کی تقسیم اس طرح ہوگی۔ حاصل کردہ نمبر 40x تقسیم کل نمبر، جبکہ پیشہ ورانہ نامہ اسے ایک کنکشن کی صورت میں نمبر کی تقسیم بطریقہ ذیل ہوگی۔ ایم اے ایف اے میں حاصل کردہ نمبر 10x تقسیم کل نمبر (5 نمبر پی ایچ ڈی + 5 ایم اے)

تفصیلی سہ ماہیوں کی تفصیل

نمبر شمار	آسامیوں کی تقسیم	CT-15	DM-15	PET-15	AT-15	TT-15
1	میرٹ	6	2	1	2	4
2	معدود افراد (2 فیصد)	0	0	0	0	0
3	اقلیت (5 فیصد)	0	0	0	0	0
4	کل آسامیاں	6	2	1	2	4

SST آسامیوں کی تفصیل

نمبر شمار	SST(G)-16	SST(B/C)	SST(M/P)	SST(I.T)	کل تعداد	میرٹ	معدود افراد (2 فیصد)	اقلیت (5 فیصد)
1	01	0	0	0	01	01	0	0

تفصیلی شرائط

(1) AT اور TT کے امیدواروں کے لئے شہادۃ العالمیہ کو ایم اے کے برابر تسلیم کرتے ہوئے مارکس ایم اے کے برابر دیے جائیں گے۔ البتہ شہادۃ العالمیہ شہادۃ القاصد اور شہادۃ العالمیہ کے کوئی نمبر نہیں دئے جائیں گے۔ TT اور AT کے علاوہ کسی اور کیزر کے لئے شہادۃ العالمیہ کے کوئی نمبر مارکس نہیں ہوں گے۔ (2) ہر تعلیمی آسامی کے لئے ضلع کی سطح پر علیحدہ علیحدہ میرٹ لسٹ مرتب کی جائیگی۔ جس میں امیدواروں کے ٹیسٹ کے حاصل کردہ نمبر اور تعلیمی قابلیت کے نمبروں کو جمع کیا جائیگا۔ (3) - فیصد میں 40 فیصد نمبر لینا ضروری ہے۔ 40 فیصد سے کم نمبر لینے

(Handwritten signature and date)
24/11/2021

Rahim Dad Rahimi
SST (BPS-16)
G.H.S Banni Jag Lower, Kohistan



والا امیدوار نا اہل تصور ہوگا اور میرٹ لسٹ میں شامل نہیں ہوگا۔ (4) CGPA کی صورت میں کاؤٹنگ نمبروں میں کی جائے گی۔ جس کے لئے متعلقہ یونیورسٹی کے کنٹرولر امتحانات کی نمبرات یا نمبرات کی فیصدی کی تصدیق شدہ سرٹیفکیٹ حاصل کرنا ضروری ہوگا۔ (5) تمام ضلعی آسامیوں کے امیدواروں کے ڈیٹا سائل میں مستقل سکونت ضلع..... کا ہونا چاہئے ورنہ درخواست پر غور نہیں کیا جائیگا۔ (6) تمام تقرریاں محکمہ ایلیمینٹری اینڈ سیکنڈری ایجوکیشن حکومت خیبر پختونخواہ کے مقرر کردہ قوانین، پالیسی اور مجوزہ طریقہ کار کے مطابق خالصتاً میرٹ کی بنیاد پر ہوں گی (7) معذور افراد کیلئے 2 فیصد کوٹہ مختص ہے جس کیلئے سینئرنگ میڈیکل بورڈ / سوشل ویلفیئر ڈیپارٹمنٹ کا اجراء شدہ سرٹیفکیٹ پیش کرنا لازمی ہے بشرطیکہ وہ معذوری فرائض کی انجام دہی میں رکاوٹ نہ ہو۔ (8) اقلیت کیلئے 5 فیصد کوٹہ مختص ہے۔ (9) اسناد کے جانچ پڑتال کے وقت اصلی نقلی اسناد بعد اصل شناختی کارڈ اور ٹیسٹ کے دن صرف اصلی شناختی کارڈ لانا لازمی ہے۔ (10) میرٹ پر آنے والے امیدواروں کی اسناد متعلقہ ادارے سے تصدیق کرائی جائے گی جس کے تمام اخراجات امیدواروں کو برداشت کرنا ہوں گے۔ (11) صرف مقررہ وقت کے اندر موصول ہونے والی درخواستوں پر غور کیا جائے گا۔ مقررہ تاریخ کے بعد دستاویزات میں کسی قسم کا ردوبدل بھی نہیں کیا جائے گا۔ (12) زیر دستخطی کو اختیار حاصل ہے کہ وہ کوئی وجہ بتائے بغیر کسی بھی وقت تکلی یا جزوی طور پر اسناد کی جانچ پڑتال کا عمل منسوخ کرے۔ (13) اگر اس اشتہار کے بعد حکومت وقت کی طرف سے بھرتی کے طریقہ کار میں تبدیلی کی گئی تو سلیکشن کمیٹی اس کے مطابق عمل کرنے کی پابند ہوگی۔ (14) محکمہ ایلیمینٹری اینڈ سیکنڈری ایجوکیشن کو اختیار حاصل ہوگا کہ وہ تمام مشتمل شدہ آسامیوں یا اس سے کم پر امیدوار بھرتی کرے۔ (15) تمام نقلی اسناد صرف گورنمنٹ کے تسلیم شدہ اداروں کی قابل قبول ہوں گی۔ (16) اگر کسی امیدوار کی اسناد جعلی پائی گئی تو اس کے خلاف قانونی چارہ جوئی کی جائے گی اور آئندہ کے لئے اسے سرکاری ملازمت کے لئے نا اہل تصور کیا جائے گا۔ (17) نامکمل فارم یا معلومات کی صورت میں درخواست فارم خود بخود منسوخ تصور کیا جائے گا جس کے لئے کوئی اپیل منظور نہیں کی جائے گی۔ (18) اسناد کے جانچ پڑتال کے لئے الگ شیڈول جاری کیا جائیگا۔ اور آنے والے امیدواروں کو کوئی TA / DA نہیں دیا جائے گا۔ (19) درخواست دینے کا طریقہ کار اور متعلقہ اضلاع کے خالی آسامیوں کی تعداد ETEA کی ویب سائٹ پر موجود ہے۔ (20) پرائیویٹ (نہج) یونیورسٹیوں کی ڈگریاں ہائیر ایجوکیشن کمیشن (HEC) سے تصدیق شدہ ہونی چاہئے۔

حافظ محمد نواز عباسی
11/11/2011

ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) محکمہ ایلیمینٹری اینڈ سیکنڈری ایجوکیشن ضلع کوہستان لوئر

INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

P-13

No. 412 /F/SSC/Secrecy

Dated: 13/09/2019

The District Education

Officer (M) Kohistan Lower

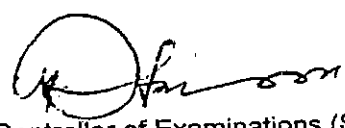
Gh. S. Bhatti J.S. Kohistan
 (BES-16)

SUBJECT: FAKE DETAILED MARKS CERTIFICATE (DMC)

Reference your letter No. 819/DEO(M) KHL Dated: 24-07-2019

Detailed Marks Certificate(s) attached herewith containing following particulars are
 and FAKE.

Roll No	Exam	Session	Name	Father's Name
16256	1995	SSC (A)	Fazal E Wahid	Abdul Hadi
~	~	~	~	~
~	~	~	~	~
~	~	~	~	~
~	~	~	~	~



Assistant Controller of Examinations (Secrecy)
 BISE, Abbottabad
 Phone No. 0992-392013

122
 13-2-2020

Attested
Rahim S.A. (BPS-16)
S.H.S. Bani Jang Lower Middle

05594

OP-14

Fake

Board of Intermediate & Secondary Education
ABBOTTABAD

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)
Session 19 95 (Annual/Supplementary)



FOUND FAKE

Student's Name Fazal F. Zahid

Roll No. 16256

SUBJECT	Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. English	150	20	
2. Urdu	150	101	
3. Islamiyat Comp.	75	45	
4. Pakistan Studies	75	45	
5. Gen. Mathematics	100	73	
6. General Science	100	63	
7. <u>13</u>	100	74	
8. <u>Arb</u>	100	70	
<u>Arb</u>	200	541	B

FOUND FAKE
FOUND FAKE
five hundred \$
Found Fake - 13-2-19

SECRETARY OFFICER
BISE ABBOTTABAD

This Certificate is issued errors and omission excepted.

Prepared by: [Signature]

Checked by: [Signature]

Date 13-2-1995

Controller of Examinations
Board of Intermediate & Secondary Education
Abbottabad

Dr. Mohammad Geer
M.O.V.C.R.H.C
Pattan

122
13-2-2020

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

22 D

NO. 866 /AB/BISE/HSSC/SECRECY. Dated: 17-SEP-19

To:

OFFICE OF THE
DISTRICT EDUCATION OFFICER MALE
KOHISTAN LOWER

Subject: Verification of Detailed Marks Certificate
Reference to your Letter No. 819 Dated 24-JUL-19

After issuance of Computer generated verification report, Secrecy Section, BISE Abbottabad is not providing verified copies of Detailed Marks Certificates. Particulars have been verified as per following details:

S/No	ID-No	Roll N	Session	Name	Father Name	DOB SSC ONLY	Group	Marks	Grade	Remarks
1	3414	26673	HSSC ANNUAL (P-II) 1998	FAZAL WAHID	ABDUL HADI			564		FAKE

FOUND FAKE

Alles as per record
[Signature]

Rahim Uddin Rahimi
S. O. (HSS-16)
G.H.S. Jambhag Lower Kohistan

Dealing Assistant Verification
Secrecy HSSC
Ph#0992-392014-Ext-248

[Signature]
Assistant Controller
Secrecy
Ph# 0992-392013

122
13-2-2020

SIS

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Attested
P

Rahim
G.H.S. Bahadurg Lower
Abbottabad

20719

P-16

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Name: Ejaz F. Waheed
Father's Name: Abdul Haq
Group: _____

Section: 19 G.S

Roll No: 26873

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	35	-	83	-	120	one hundred twenty
Urdu (Comp)	200	43	-	88	-	90	Ninety only
Basic Education	50	-	-	-	-	28	Twenty eight only
Pakistan Study	50	-	-	-	-	26	Twenty six only
Arabic	200	49	-	51	-	100	one hundred only
Islamic Studies	200	53	-	39	-	92	ninety two
Health & Physical Education	200	57	-	55	-	112	one hundred twelve
Total: 1100						568	Five hundred sixty eight

Also as per feed
Remarks:

Checked By: _____

Date: _____

FOUND TRUE

Controller of Examinations
Board of Intermediate & Secondary Education
Abbottabad

Note: Errors / Omissions accepted

Dr. Mohammad Ezz
13/2/2020

17/1/21

122
13-2-2020

(For use in Police Department only).

Attested

Rahim Dad Rahim
G.S.A. (IPS-16)
G.H.S. Bani Jagi, Lower Kohistan, S.S.

Annexure "G" (17)

1. Passed S.S.C Examination from BISE Board
2. Abbatatabad in 2001 under Roll No 16256
3. Obtained marks 371/850-

Verification Roll No. FA dated received back Do doubts

(2) Passed FA Examination from BISE Board Abbatatabad under Roll No. 26873 - Held in 15-8-1998 - Obtained marks 568/1100 with Thumb Impression



Do doubts

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L. or B.A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualifications—	
Drill Instructing			
Court Duties			
Reserve Duties			

Note:— The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

Attested
Rahim Dad Rahimi
G.S. (B.S. 16)
G.H.S. Jamshaj Lower Kohista

FAZAL E WAHID

2. Race: SAID MIRKHEEL

3. Residence: Village & P.O. Pattan Teh. Pattan District Kohistan

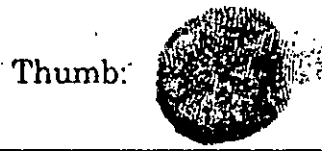
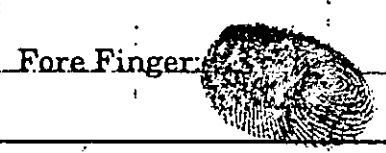
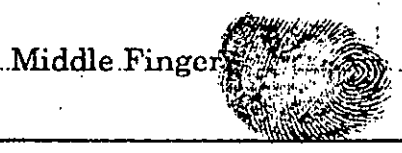
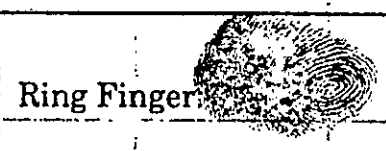
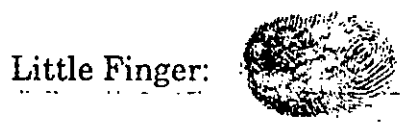
4. Father's name and residence: ABDUL HAI


5. Date of birth by Christian era as nearly as can be ascertained: (1983) (05-01-1983)

6. Exact height by measurement: 5-6

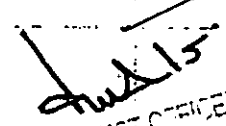
7. Personal marks for identification: MB

8. Left hand thumb and Finger impression of (Non-Gazetted) officer:



9. Signature of Government Servant: 

10. Signature and designation of the Head of the Office, or other Attesting Officer.


DISTRICT OFFICER
E.S. Education Kohistan

Bahinabhai Rahimi
S.A. (19546)
G.H.S. Bahinabhai Jag. Lower Khatolgaon

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary.	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of A. pointment	8 Signature of Government Servant
GMS Barbela DM			BPS 9 (3185-190-8885)				
			Rs 3185/-			14/2/07	[Signature]
			Rs 3185/-			11/10/07	[Signature]
			BPS 9 (3520-270-15720)				[Signature]
			Revised BPS 9 (6200-380-17600)				[Signature]
	OB: Tup:		6200/-			12/2/11	[Signature]
			6960/-			12/2/12	[Signature]
			Allotted BPS No 15 (8500-700-29500) due to upgradation w.e.f 01-7-2012				[Signature]
	-b-		8500/- Fixed.			01/07/2012	[Signature]
GMS Barbela			Rs. 9200/-	PM (Fixed)		12/2012	[Signature]
			9900/- pm	8500/-		12/2013	[Signature]
GMS Madatshah			10600 pm	8500/-		12/2014	[Signature]
			13700	10985		7/15	[Signature]
			Rs 10985			12/2015	[Signature]

OF RS
THE SECRETARY
M.A. P. S. 2011

14-2-2011
13-2-2011

Approved
Pay Fixing
M.A. P. S. 2011

Attested



90

Rahim Dad Rahimi
S.A.T. (EBS-15)
G.H.S. Bahi Waj Lower Kohistan

Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any record of punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave or average pay upto four months for which leave salary is debitable to another Government		
<i>[Signature]</i> District Officer Edu (M) Distt. Kohistan	30-11-07	Fixed	<i>[Signature]</i> District Officer Edu (M) Distt. Kohistan		Appointed against DM Post at G.H.S. Bahi Waj vide D.O. Kohistan Exd No 57824-39 Dated 13-8-2007 ✓		
<i>[Signature]</i>	30-6-08	S/Rew.	<i>[Signature]</i>			<i>[Signature]</i> District Officer (Male) Edu Education Kohistan	
<i>[Signature]</i>	30-6-2010	S/Rand	<i>[Signature]</i> District Officer (E&S) Edu (M) Distt. Kohistan		Adjusted at G.H.S. Jalkot against vacant post vide E.D.O. (E&S) Edu K.H. Exd No 2036-40. Dated 9/5/2011 - No. 01-01-2011.		
<i>[Signature]</i> District Officer (E&S) Edu (M) Distt. Kohistan	30-11-2011	Fixed	<i>[Signature]</i> District Officer (E&S) Edu (M) Distt. Kohistan			<i>[Signature]</i> District Officer Edu Education Kohistan	
<i>[Signature]</i> District Officer (E&S) Edu (M) Distt. Kohistan		Entry provided to Scale up grade BPS-15	<i>[Signature]</i> District Officer (E&S) Edu (M) Distt. Kohistan		Sorcer I verified for 10/2011		
<i>[Signature]</i> District Officer (E&S) Edu (M) Distt. Kohistan	30-11-2012	Aligner	<i>[Signature]</i>		<i>[Signature]</i> District Officer Kohistan 2/8/2011		
<i>[Signature]</i>	30-11-2012	Aligner	<i>[Signature]</i>				
Dy. DEO (M) Kohistan	30-06-15	Aligner	Dy. DEO (M) Kohistan		Provision Payroll on all of Areas of Adjointment on 1/1/2011 to 30/9/2011		
Dy. DEO (M) Kohistan	30-11-15	Aligner	<i>[Signature]</i>				
Dy. DEO	30-06-15	S/Rand	<i>[Signature]</i>				

Rs. 9744 1/2 vide S. No 14 dt. 20/11/2011

District Accounts Officer
Kohistan

Altered
Bahin Das Bahin
 S.A. (BPS-16)
 G.H.S Bahi, Jag Lower Kohistan

(21)

6

Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Serv
DM		13-15 (13510-1120-47110)					
G.M.S Kotlika			Rs. 13510/-			01-16	<i>(Signature)</i>
<i>(Signature)</i>			Rs. 13510/-			12-01-16	<i>(Signature)</i>
38000/-			38000/-				
62000/-			62000/-				
12-2007-12/12 to 4/13 8400/-							
12-2007-14/13 to 11/14 16800/-							
7-2007-12/14 to 6/15 14700/-							
27/15 2/2013 to 2/15 5430/-			Rs. 45330/-				

Office of the Accountant General
 Khyber Pakhtun Khwa Pashtunwa
 Pay Fixed in the Revised Basic Pay Scales
 R.B.P.S. w.e.f. 01-07-2007
 Pay Fixed in the Revised Basic Pay Scales
 R.B.P.S. w.e.f. 01-07-2008
 Pay Fixed in the Revised Basic Pay Scales
 R.B.P.S. w.e.f. 01-07-2011
 Date of last increment is on 01-12-2011
 Authoris Officer
 Pay Fixation Party
 Khyber Pakhtun Khwa

(Signature)

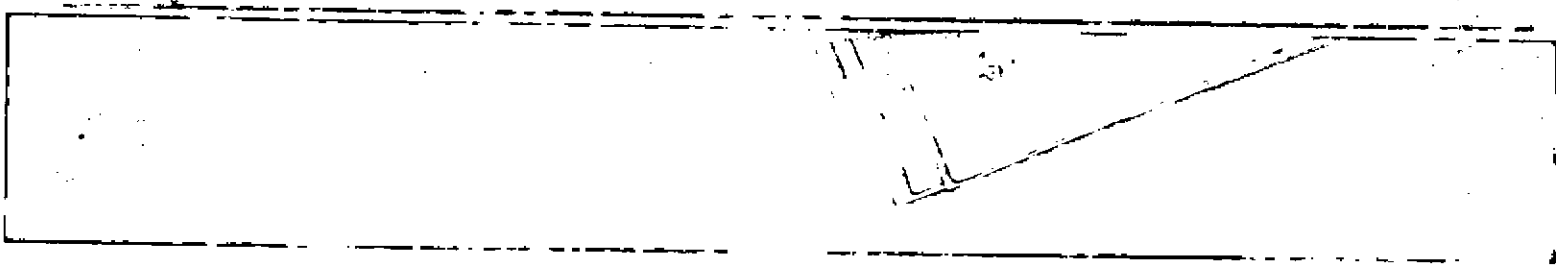
(Signature)

Signature of Government Servant		Signature of Head of the Office		Signature of Other Attesting Officer		Signature of the Head of the Office or Other Attesting Officer		Reference to any recorded punishment or censure or reward by the Government Servant	
Date of termination or appointment		Reason of termination (such as promotion, transfer, dismissal, etc.)		Nature and duration of leave taken		Allocation of period of leave on average pay upto four months for which leave salary is deductible to another Government			
30/11/2017		Fixed STR		Dy. DEO Kohistan		Service verified w.e.f 01-12-2016 to 30-11-2017 from 1st roll			

Dy. DEO (M) Kohistan		G.M.S Kotya Pattan Kohistan		Dy. DEO Kohistan		1/12/17	
Most Important		Following documents were verified and found		HEAD MASTER G.M.S Kotya Pattan Kohistan		30/11/2017	
1- SSC DMC		2- HSSC DMC		3- Appointment order		4- Medical certificate	
vide this office Nos. BISS 819 dt 24-7-09 SSC		+ FA 819 dt 24-7-09 / ISSP 4C / 1552-D-0		dated 24-9-09		Sanction of Earned leave with full pay w.e.f 01-4-2017 to	
		DEO (M) Kohistan vide		End M No. 3429-40 Dated 4/5/17		DDO	

122
13-2-2020

10	11	12	13		14	15	
			LEAVE	Reference to any recorded punishment or censure, or reward or praise of the Government Servant			
Designation of the officer posting officer	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other appointing officer	Nature and duration of leave taken	Amount of period of leave on average pay up to four months for which leave is granted by Government	Signature of the head of the office or other appointing officer	
<i>[Signature]</i> S. P. O. 1 Peshawar	30-11-76	A/the Not done	<i>[Signature]</i> By Dy. Secy Peshawar				<i>[Signature]</i> 14-8-09 In 30-11-76
<i>[Signature]</i> D. P. O. Peshawar	30-6-07					<i>[Signature]</i> District Officer E.S. Edu. (M) Distt Kohistan	
					<p>Service verified for 9/2013 due to adjt of arrears SC Se CPB B-9-13-15. W.D. 1-7-2012 & 31-8-2013 S. No. 96. dt. 19-9-13. 21:65340/- adjt - 9/2013. 25/9/2013. Service verified w.c.d. 21/3 0 2030-15 from Acy: Roll other of record. Dy. Distt Edu. Officer (S. O.) Kohistan Dy. Distt Edu. Officer (S. O.) Kohistan</p>		
					<p>Service verified w.c.d. 8-12-15 to 20-11 from Acy: Roll other record</p>		



Attended

24

Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant Designation of the officiating officer Initiation of service from 1 to 8 Date of termination of appointment
D.M		BPS-15	16120	1330	56020		
GMS Kotla		16440-1340		16120	16120	01-07-2017	[Signature]
				Rs. 16120		12/07	
				Rs. 16120		12/07	

REMOVAL FROM SERVICE

Removal from Govt. Service vide

DEO(M) Kohistan Lower

Endst. No. 1270-75 dated 22-02-2020

W.P. 7. 01-07-2019 (copy attached)

Dy. District Officer (hr)
Kohistan Lower

Annexure *Walter* (25)

GS&PD—RWPF—303 RS. 2,000 P. of 100 6-10-87-12

Rahim Dad Rahim
S. T. (BBS-16)
G.H.S. Mani Jag Lower Kohistan

MEDICAL CERTIFICATE

P-0000

Name of Official *Fajal Usab Khan*
 Caste or race
 Father's name *Abdul Khayyab*
 Residence *Village P.H. Dilli Khan*
 Date of birth *1983 05 01 1983*
 Exact height & measurement *5'6" or 6'0" cm*
 Personal mark of identification
 Signature of the official *[Signature]*
 Signature of head of office

Seal of Office

I do hereby certify that I have examined Mr. *Fajal Usab Khan* for
 employment in the office of the *Sub-Station Officer*
 and can not discover that he had any disease communicable or other constitutional
 affection or bodily infirmity except *None*

I do not consider this as disqualification for employment in the office of the *Sub-Station Officer*
 His age according to his own statement, *20* years and by
 appearance about *20* years. *Two of yes*
Scar on the lower chest

LEFT HAND THUMB AND FINGER IMPRESSIONS



Medical Superintendent
Civil Hospital

[Signature]
28/1/89

122
13-2-2020

[Handwritten mark]

Amended "I"

(26)

(17)

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Attested

OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER



Rahim Adnan deekohistani@gmail.com

Face Book: DEO Male Kohistan Lower

Rahim Adnan Rahimi
IAS (A) T-3 (BPS-16)
G.H.S. Banitdag Lower Kohistan

CHARGE SHEET

1. In continuation of pervious Charge Sheet issued vide this office order No.1807 dated 12/10/2019. I Mr. Hafiz Muhammad Nawaz District Education Officer (Male) Kohistan as competent authority, hereby charge you **Mr. Fazal Wahid DM GMS Khan Abad Pattan** as follow.

That you, while posted as DM at GMS Khan Abad Pattan committed the following irregularities/illegalities.

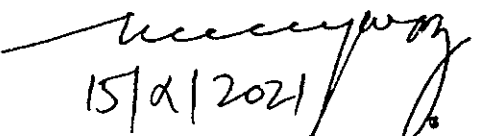
- (a) Guilty of Misconduct
- (b) Guilty of Corruption
- (C) Concealing of Facts
- (D) Fraudulently Activities.

2. By reason of the above, you appeared to be guilty of the **Above Allegations** under rule 3 of the Khyber Pakhtunkhwa Government Servant (efficiency and Discipline) rule 2011, and have rendered yourself liable to all or any of the penalties specified, as the case in rule 4 of the rule ibid.
3. You are, therefore required to submit your written defence within 7 days of the receipt of this charge sheet to the Inquiry Officer, failing which it will be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
4. Intimate whether you desire to be heard in person or not.
5. A Statement of allegation is enclosed

No. _____/DEO (M) KHL Dated Pattan the _____/2021.

Copy to:-

1. Fazal Wahid DM GMS Khan Abad Pattan


15/12/2021
COMPETENT AUTHORITY

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**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER**

Email: deokohistan1@gmail.com

Face Book: DEO Male Kohistan Lower

DISCIPLINARY ACTION

1. In continuation of previous disciplinary action/ statement of allegation issued vide this office order No.1808 dated 12/10/2019. I Mr. Hafiz Muhammad Nawaz District Education Officer (Male) Kohistan as competent authority, am of the opinion of that **Mr. Fazal Wahid DM GMS Khan Abad Pattan** has rendered himself liable to be proceeded against as he committed the following acts/ omission, within the meaning of rule 3 of the Khyber Pakhtunkhwa Government Servant(efficiency and Discipline) rule 2011.

STATEMENT OF ALLEGATIONS

- i. **Guilty of Misconduct**
- ii. **Guilty of Corruption**
- iii. **Concealing of Facts**
- iv. **Fraudulently Activities.**

2. For the purpose of inquiry against the said accused with reference to the above allegations and inquiry Officer, Nominated by worthy Director E&SE KPK vide No, 8784-87/F.No.-Inquiry Against Fazal Wahid DM Kohistan Lower dated 12/10/2021 under rule 10 (1) (a) of the ibid rules.

Mr Ashfaq Jadoon DEO (M) Baffagram is nominated as inquiry office.

- 3. The Inquiry Officer shall in accordance with the provisions of the ibid rules provide reasonable opportunity of hearing to the accused , records its finding and make, within 7 days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.
- 4. The accused and a well conversant representative of the Department Mr. Rahim Dad ADEO (Litigation) local office will join the proceeding on the date, time and place fixed by the Inquiry Officer.

No. _____/DEO (M) KHL Dated Pattan the _____/2021.

Copy to:-

- 1. Fazal Wahid DM GMS Khan Abad Pattan

[Signature]
15/11/2021
COMPETENT AUTHORITY

Signature "J"
Attested

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Officer of the District Education Officer (M) Battagram

dated 4/04/2022

Chief Executive Officer
Lower Kohistan

The Director Elementary & Secondary Education Khyber Pakhtoon Khwa
Peshawar

**Subject: DE novo Inquiry regarding Fazal Wahid DM GMS Koltian District
Kohistan Lower.**

Memo:

In compliance with your notification bearing no 8784-87 dated 12/10/2021 the undersigned was nominated as enquiry officer to conduct enquiry against Fazal Wahid DM GMS Koltian Kohistan Lower in the light of the Honourable Service Tribunal Peshawar decision in Service appeal No 1404/2020.

Background/ Brief Description of the case

- 1- Mr Fazal Wahid DM was appointed in BPS 09 vide DCO Kohistan Endst No 7824-30 dated 13-08-2007.
- 2- As per statement of Mr Fazal Wahid he was only SSC passed at the time of appointment.
- 3- He performed duty as DM in Kohistan for about 13 years.
- 4- As per entries on Page no 2 & Page No 3 in the service book of the teacher his date of birth is 05-01-1983 while he has passed his SSC in 1995 securing 541 marks as per entries in service book provided by DEO(M) .While photo copy of the relevant page of Service Book is quite different from the one provided by DEO(M) Lower Kohistan which shows his passing of SSC in 2001 securing 371 marks.
- 5- His Service book was properly maintained and signed by DDO's regularly.
- 6- The Documents of the teacher i.e. SSC & FA as entered in Service Book provided by DEO(M) Lower Kohistan were sent to concerned Board of intermediate & Secondary Education by the DEO (M) Lower Kohistan which were declared as bogus. While the teacher concerned does not own those document He has diverging view that Someone has placed those documents in his Service Book as He had no access to Service Book as the same is maintained in office.
- 7- Two different enquiries at different time were got conducted by the Department.

DDM-I

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16-2-2022

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29/3/22

29-3-2022 ADD (M)
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29-03-2022

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second enquiry, the enquiry officer Mr. Bakhtiar Anjum Principal GHSS Paimal Shareef recommended his removal from service.

While the first enquiry conducted by Mohammad Nawab Khan SDEO (M) & Sultani Room SST GHS the matter was left to the Department for decision.

10- On the strength of recommendation of the second enquiry the DEO (M) Lower Kohistan issued statement of allegations to teacher concerned and removed him from service vide his no 1270-75 dated 22/2/20 with speaking order.

11- Against the removal order issued by DEO (M) Lower Kohistan the teacher filed service appeal in honorable Service Tribunal vide Service appeal No 1404/2020 and honorable service Tribunal set aside the order of removal from service passed by DEO (M) Lower Kohistan and reinstated the teacher into service for the purpose of denovo enquiry on 15/9/2021.

12- Worthy Director E&SE vide No 8784-87 dated 12/10/11 ordered for conducting denovo enquiry.

REVIEW OF RECORD:

The record attached/ provided by the applicant and DEO (M) Lower Kohistan was reviewed with the following main points.

1- The so called appointment order passed by DCO kohistan in respect of Mr Fazal Wahid vide DCO Kohistan No 7824-37 dated 13/8/2007.

2- His service book was maintained properly by DDO's with their signatures. & Service was periodically verified with their signatures.

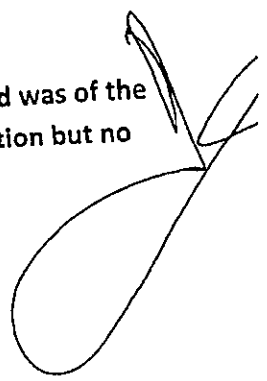
3- As per notification provided by DEO (M) Lower kohistan, the qualification for appointment as DM in 2007 was FA+DM while Mr Fazal was Matric only.

4- The matric certificate available & recorded in his service book (As per copy provided by DEO (M) Lower Kohistan was sent to concerned Board for verification which as per statement of DEO (M) Lower Kohistan was reported back as Fake. But the SSC certificate declared as fake was of session 1995 passed securing 541 marks while the teacher concerned Claims to pass his SSC in session 2001 securing 371 marks as regular student of GHS Pattan as per his statement.

It is not confirmed from any record that on the strength of which certificate he was appointed as there is difference of Marks obtained in both the certificates.

5- As far as appointment on the strength of SSC is concerned the applicant Mr Fazal Wahid was of the view that since Kohistan is a backward District and Government has relaxed the qualification but no notification of the said relaxation was provided by him in favor of his statement.

2- Two different enquiries were got conducted by the Department.



Rahim Dad Rahim
S.A.T. (B.S. 10)
G.H.S. Bahindeg Lower Kohistan

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of second enquiry by DEO (M) Lower Kohistan issued statement of allegation and removed him from service.

He preferred a service appeal in Honorable Service Tribunal Peshawar and the tribunal vide its judgment reinstated the teacher concerned for the purpose of denovo enquiry.

FINDINGS:-

The scrutiny of the relevant record / document of the statement of the teacher and record provided by the DEO (M) led the undersigned to the following findings.

- 1- Mr. Fazal Wahid S/o Abdul Hai was appointed by District coordination officer Kohistan as DM in BPS 9 at Govt Middle Schol Bar Bela Kohistan Upper vide No 7824-30 dated 13-8-2007.
- 2- SSC certificate recorded in service book submitted by DEO (M) Lower Kohistan for verification were returned as fake as per detail as under:
SSC Session 1985 Roll No: 16256 passed with 541 marks.

But the teacher does not own that certificate to be his certificate.

As per his statement that certificate was submitted by DEO (M) lower Kohistan from service Book which were placed someone else.

3- in response he has submitted his SSC certificate quite different from fake one with the following particulars:

SSC session 2001 Roll No 16256 securing 371-D marks. He showed this qualification to be acquired as regular student of Govt High School Pattan.

He has also submitted character & Provisional certificate issued by GHS Pattan. This fact can easily be verified from record of GHS Pattan which falls under the purview of Office.

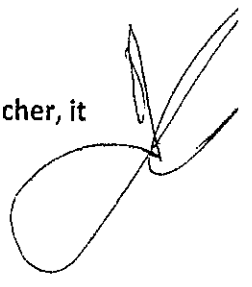
This fact remained hidden in both the enquiries.

4- Now in 2021 he has also submitted his FA certificate passed from BISE Abbottabad under No 150006 during session 2021 (A) securing 598- C marks

5- On the strength of il enquiry Mr. Fazal Wahid DM was removed from his service by DEO (M) lower Kohisatn but Mr. Fazal Wahid denied his appearance before enquiry officer Bakhtiar Anjum.

CONCLUSION:

After perusal and scrutiny of available record provided by DEO (M) and statement of the teacher, it revealed that:



Rahim Durrani
S.A. (JES) (M)
C.I.S. Bahawalpur Lower Kohistan

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Mr. Fazal Wahid was appointed as DM vide DCO Kohistan Upper vide no: 7824-30 dated 13-8-2007. Record of Department selection Committee is available on the basis of which the said order was issued by DCO.

Rahim Dad Rahimi
S.A.T (BPS-16)
G.H.S Banni Vag Lower Kohistan

In response to enquiry officer DCO Kohistan vide No 1112 dated 20/01/2020 confirmed that the DCO was competent enough to issue appointment order from BPS 11 to BPS 15 vide notification No: OA-VCE&AS12-7/2003 dated 17/9/2005 DC vide his above letter he has stated that, "codal formalities i.e. clarification of vacant post, Advertisement for fresh appointment, collection of application, their list maintenance, short listing and conduction of their test, DSC committee notification, circulation of agenda copies for DSC to all notified members before the fixation of DSC meeting and preparation maintenance before and after DPC and all that record was the responsibility of parent concerned Department." But no such record is available.

Mr Fazal Wahid has also provided order of Abdul Razaq TT in BPS 7 issued by DCO Kohistan. When DCO was competent enough to issue appointment orders from BPS 11-15. Then How this order.

6- DC Kohistan in his letter addressed to enquiry officer has given a general statement that "If Proper procedure/ basic requirement before and after DSC is not adopted for the selection which is mandatory such orders will be considered as null & void & fake and bogus.

7- The qualification for DM at that time was FA and one year training in drawing.

8- Apparently at the time of appointment he was lack in qualification. i.e. he was SSC only which leads to conclusion that the DEO(M) that his appointment is fake.

9- But the DM claimed that since Kohistan is backward area as such relaxation was granted in qualification. But no documentary evidence & proof was provided /presented.

10- As the sanad of SSC which is not owned by Mr Fazal Wahid and entered in service book was send for verification which was declared as bogus.

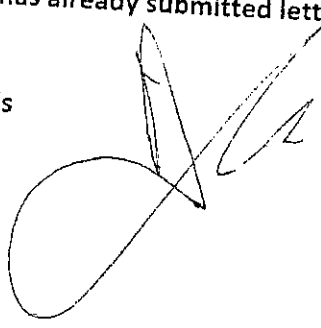
But the certificate which he own as regular student of GHS Pattan was not sent for verification. But the question remained unsolved on the strength of whose sanad he was appointed. Which can only be confirmed after perusal of record of his appointment including working paper & minutes of DSC meeting.

11- It also revealed that he remained in service for Thirteen years. His service book was properly maintained and entries were properly signed by different DDO's and he was paid salary.

12- Regarding relaxation DEO (M) Lower Kohistan has already submitted letter 1608 dated 4/10/2019 for seeking guidance from your honour..

13- His service was verified by the concerned DDO's

Recommendations:



Attended
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GHS Baniwag Tower Kohistan
Rahim Dac Rithina
ASAT (BNS-101)

Appointment be traced from office of the then DEO(M) Kohistan upper where the appointed. Unless & until the complete record / Minutes of DSC are not available can be stated about the fate of Appointment order as Maintenance of Record as pointed by in his letter too is the sole responsibility of the office where he was appointed.

The certificate of SSC which Mr. Fazal Wahid owns or the on the strength of which he was appointed be got verified after perusal of record of DSC ie Working papers & Minutes.

Orders of Govt if any regarding relaxation in qualification for backward area like Kohistan be traced & placed on record.

4.: Since his service has been properly verified by different DDO,s at different time for 13 Years.

After serving for more than 13 years what will be of rights accrued by the Teacher concerned.

5.: For unearthing real factual position a broad based high level enquiry committee be constituted to investigate the matter in two Districts & Schools & interrogate all officers/DDOs of the entire period of thirteen years who proposed his appointment & disbursed pay & verified his service.

6.: The appointment order be sent to the Then DCO for verification of Signature or otherwise.

7.: Copy of Dispatch Register of DC office upper Kohistan be got verified regarding authenticity or otherwise of entries regarding appointment of Teacher concerned.

8.: As far as recording entries in the Service Book, The then official who prepared & officer who signed it be interrogated.

9.: Other order of Abdur razaq TT BPS 7 appointed by DCO sb provided by Mr Fazal Wahid be also investigated upon .

& in the light of answers of above points matter may please be decided by the competent authority

Muhammad Ashfaq Khan Jadoon
District Education Officer(M) Battagram

"K" (33)

Facts finding Inquiry report in R/O Fazal Wahid DM

Rahim Dad Rahimi
S.A. (BPS-16)
G.H.S.B. Jirga Lower Kohistan
The District Education Officer (Male)
Kohistan Lower

Subject: De-novo Inquiry Report in R/O Fazal Wahid DM GMS Khan Abad

Memo:-

We the Undersigned were entrusted with de-novo inquiry in R/O Fazal Wahid DM GMS Khan Abad With reference to letter bearing No. 2039-42/Inquiry/DEO (M) KH-L dated 11/05/2022. The report is as under please.

Background / Introduction:

The de-novo inquiry was initiated by District Education Officer (M) Kohistan Lower as the case is under process in honorable Service tribunal Peshawar. The de-novo inquiry already conducted by DEO (M) Battagram and submitted to Director Elementary & Secondary Education Khyber Pakhtunkhwa vide No 15 dated 4/1/2022. The worthy Director sent the inquiry report for implementation to DEO (M) Kohistan lower but DEO (M) Kohistan lower constituted inquiry committee for verification of record form DC Office Upper Kohistan as well as DEO (M) Kohistan upper.

Procedure / Methodology:

After receiving written order from worthy District Education Officer (M) Kohistan Lower to conduct de-novo inquiry/verification of record from both the offices form Kohistan upper, we the undersigned paid visit the office of DEO (M) Kohistan Upper for collection of relevant record as well DC Office Kohistan upper on 8/6/2022 and 24/6/2022 on the basis of pervious conducted inquiry and also visit the DEO (M) Office Lower Kohistan in CW collection of record from ADEO (Litigation) Rahim Dad Raheemi. After that Mr, Fazal Wahid DM GMS Khan Abad was contacted for personal hearing/production of record in his defence. We visited the concerned schools of the officials for verification of his duty performance.

Facts Findings.

- ADEO (Liti)*
1. The above named officials was appointed on DM post vide DCO Kohistan Endstt: No 7824-30 dated 13/8/2007 at GMS Bar Bela. After that he was transferred to GMS Banil Qala on 1/12/2012 no order placed on record and then he was transferred from Banil Qala to GMS Kotia on 01/07/2016.
 2. That as per statement of Mr, Fazal wahid he was only SSC passed at the time of appointment and he claimed that since Kohistan is Backward District and Govt has given relaxation in the qualification but no notification of the said relaxation was provided by him in favour of his statement. It is also clear that there was no relaxation in qualification for the post of DM in Kohistan at that time.
 3. That as per record the documents of the teacher i.e. SSC and FA as entered in Service Book provided by ADEO Litigation Kohistan Lower already declared from concerned Board as Bogus, while the teacher concerned does not own those documents. He diverging view that someone has placed those documents in his service Book as he had no access to service book as the same is maintained in office.
 4. That he provided SSC passed in 2001 under Roll Number 16256 securing Marks 371/850 and HSSC passed in 2021 under Roll NO. 15006 after his appointment. SSC certificate was entered in his service Book page No 2 which shows tempering.
 5. That as per record of his service book at page No-05 he was appointed on 13/8/2007, while source-I was verified by DAO Kohistan for activation of his pay on 21/11/2011 after expire a period of more than 04-years.
 6. That as per office record of DC Kohistan Upper the Endorsement No of the said appointment in R/O Fazal Wahid exists in the Dispatch register and also provided attested photo copies of dispatch register while during the visit of DEO (M) Office Kohistan upper there was no record found of this appointment procedure as ADEO Estb: provided written statement.
- 5/7/22*
- 7/7/22*
- 05/07/22*

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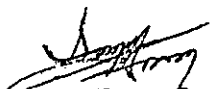
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That as per record i.e service Book the above named officials received/paid salaries regularly from 01/2011 up to his removal from service and service book also verified by DDO regularly first entries signed by Ex- EDO Mukhtiar Ahmad retired from service and after that all entries signed and pay activated by Ex-Head Master retired from service Mr, Abdur Rashid the then DDO of Middle Schools.

8. That as per procedure until then, the salary cannot be drawn by the DDO till the verification of all documents of appointee by DEO concerned and pay release letter issue to DDO otherwise any consequence made all responsibility fixed upon on DDO. His salary was drawn by DDO without verification and pay release order of DEO concerned

Keeping in view of the above facts/finding that dispatch No verified by DC Office Kohistan upper while other record is not found in the office of DEO (M) Kohistan upper. It is cleared that the service book and service is verified by the competent authority up to his removal from service, while the appointment record should maintain by Education office as well as responsible for keeping the record safely. It worth mentioning here that the qualification for DM post at that time was FA+DM but he was appointed on SSC. It is clear that the official has served more than 11-years 10-months and 19-days and received his salary up to removal from service. Now the required qualification for the post of DM is BA+ nine month in service mandatory professional training at RITE/PITE, therefore your good self being competent authority if agreed He may be given a time or opportunity to enhance his qualification as BA+ DM course within 3-years failing which he may be removed from service. Intervening period between removal from service and reinstatement i.e. 01/07/2019 to 12/10/2021 may please be converted in to Extra ordinary leave without pay (No work No pay). After re-instatement he performed his duty as per report of Incharge of the school. Report submitted for your kind perusal and further necessary action please.


(Sultan Room Qureshi)
Principal GHSS Ranolia


(Furqan)
I/C Principal GHSS Chakai


(Abdul Haq)
I/C DY: District Education Officer (M)
Koistan Lower
5/7/22

Rahim Dad Rahimi
S.A.I.P. (RPS-16)
G.H.S. Bani Jag Lowak Kohistan



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHISTAN LOWER**

Email. deokohistan1@gmail.com

Face Book: DEO Male Kohistan Lower



Muhammad

AUTHORITY LETTER

I Mr. Aurang Zeb District Education Officer Male Kohistan Lower is hereby Authorised to Mr. Rahimdad Rahimi ADEO Litigation (M) to appear for submission parawise comments etc in service appeal No.108/2023 and titled Fazal Wahid vs Govt of KPK.


DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER