

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Appeal No. 493/2014

Date of Institution ... 8.4.2014

Date of Decision ... 20.09.2017

Mr. Gul Badshah S/O Yousaf Jan,
PST, GPS, Wanda Faqeeran,
Inside Ahmad Khel, LakkiMarwat. ... (Appellant)

VERSUS

1. The District Education Officer(Male) (E&SE) ,LakkiMarwat.
2. The Director (E&SE) Department, Khyber Pakhtunkhwa Peshawar.
3. The Secretary, (E&SE) Department, Khyber Pakhtunkhwa Peshawar.
4. District Accounts Officer, LakkiMarwat. ... (Respondents)

Mr. Saadullah Khan Marwat,
Advocate --- For appellant.

Mr. Muhammad Jan,
Deputy District Attorney ... For respondents.

MR. GUL ZEB KHAN ... MEMBER
MR. MUHAMMAD HAMID MUGHAL ... MEMBER

JUDGMENT

GUL ZEB KHAN, MEMBER. - This judgment shall dispose of the aforesaid Appeal as well as the connected Service Appeals No. 494/2014 titled "Waheedullah-Versus-District Education Officer (Male) E&SE Department LakkiMarwat& Others" and 668/2014 titled "Habibullah-Versus-District Education Officer (Male) E&SE Department Lakki Marwat & Others" as similar question of law and facts are involved in all the three appeals.

2. The aforesaid appeal dated 8/4/2014 has been lodged by Mr. Gul Badshah, PST hereinafter referred to as appellant, under Section-4 of Khyber Pakhtunkhwa Service Tribunal Act 1974, wherein it has been stated that the salaries of the appellant were

stopped since his very appointment on 21/1/2013 and that the departmental appeal against stoppage of his salaries dated 6/1/2014 was not disposed of within statutory period of ninety days and hence this appeal.

3. Brief facts of the case giving rise to the instant appeal are that the appellant claims to have been appointed as PST in BPS-12 in the Education Department, District Lakki Marwat on 21/1/2013, on the recommendation of the Departmental Selection Committee and performing duties at GPS Wanda Faqiran Dakhli, UC Ahmad Khel, District Lakki Marwat, but the respondent department is not paying monthly salaries to him since his appointment/taking over charge, on the ground that the appellant was not a civil servant as he has produced fake and bogus appointment order.

3. Learned counsel for the appellant argued at the bar that the appellant was appointed vide order dated 21/1/2013 after fulfillment of all legal and codal formalities i.e advertisement of vacancies in news papers and selection through Departmental Selection Committee meeting by the respondents and that appellant took over his charge in GPS Wanda Faqiran Dakhli, UC Ahmad Khel on 1/3/2013. That since date of appointment till date, the appellant is performing his official duties with devotion, but the respondents are not paying his monthly salaries which is violation of Section-17 of the Khyber Pakhtunkhwa Civil Servant Act 1973, which provide that the civil servant appointed to a post shall be entitled to the pay sanctioned for such post. That the appellant preferred departmental appeal on 6/1/2014, but the same was not disposed of within the statutory period of ninety days. Learned counsel for the appellant further contended that the respondents have badly violated the mandatory provisions of the law and rules. That the appellant has not been treated according to law statutory rules as despite being a civil servant, his salary has been stopped without serving any charge sheet/issuing show cause notice or conducting any departmental enquiry, hence respondents may be directed to release monthly salaries of the appellant since 21/1/2013.

4. In rebuttal, the learned Deputy District Attorney argued before the court that the appeal of the appellant is not maintainable on the ground of limitation. There is neither any departmental appeal of the appellant nor any final order of the respondent department. That the appellant has produced fake and bogus appointment order/letter and as such the appellant is not a civil servant at all and therefore no action is ever required on the appeals of those who are not civil servants. That the appellant has not come to the Khyber Pakhtunkhwa Service Tribunal with clean hands as he has concealed material facts by showing advertisement of 2007, because in that case there were only three posts available for appointment in UC Ahmad Khel and which is a closed transaction and not automatically applicable for any subsequent selection/recruitment process after 2007. Each fresh/subsequent appointment/selection requires due process of issuance of fresh advertisements, conducting interviews and finally considerations by the departmental selection committee meetings under the chairmanship of the relevant authority. The learned Deputy District Attorney further contended that since the instant appeal is badly time barred and without any substance, hence may be dismissed with cost.

5. We have heard arguments of learned counsel for the appellant and learned Government Pleader for the respondents and have gone through the record available on file.

6. Perusal of record revealed that the merit list relied upon during the arguments was not relevant and an old list of 2007, which at this time was a closed chapter. There was no fresh or valid merit list or minutes of the DPC in support of the fresh claim i.e appointment order of the competent authority during the year 2013. The appellant could not establish his right regarding release of salaries, as such the present appeal is devoid of merit and any legal footing, hence dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

20.09.2017



(Muhammad Hamid Mughal)
MEMBER



(Gul Zeb Khan)
MEMBER

20/9/2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today placed on file, the present appeal is devoid of merit and any legal footing, hence dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

20.09.2017



(Muhammad Hamid Mughal)
MEMBER


(Gul Zeb Khan)
MEMBER

11.01.2017


Appellant with counsel and Mr. Hameed ur Rehman, AD (Litigation) alongwith Addl. AG for respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 04.04.2017.


(AHMAD HASSAN)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER


04.04.2017


Counsel for the appellant and Mr. Sharif Ullah, ADEO alongwith Mr. Adeel Butt, Addl: AG for the respondents present. Argument could not be heard due to incomplete bench. To come up for final hearing on 29.05.2017 before D.B.


Chairman

29.05.2017

Counsel for the appellant and Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 20.09.2017 before D.B


(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member


27.1.2016

Counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) and Sharifullah, ADO alongwith Assistant AG for respondents present. Joint para-wise comments submitted. Cost of Rs. 500/- also paid and receipt thereof obtained. The appeal is assigned to D.B for rejoinder and final hearing for 12.5.2016.


Chairman

12.5.2016

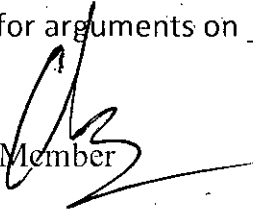
Counsel for the appellant and Mr. Hameedur Rahman, AD alongwith Ziaullah, GP for the respondents present. Counsel for the appellant seeks adjournment. Adjourned for rejoinder and final hearing to 07.09.2016 before D.B.


Member


Chairman

07.09.2016

Counsel for the appellant and Mr. Sharifullah, ADO alongwith Usman Ghani Sr. GP for respondents present. Submitted rejoinder copy of which is placed on file. To come up for arguments on 11/11/2017.


Member


Member

28.07.2015

Appellant with counsel, M/S Sharifullah, ADO, Javed Ahmed, Supdt and Khurshid Khan, SO alongwith Assistant A.G for respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Another last opportunity granted. To come up for written reply as well as reply to application on 22.9.2015 before S.B.


Chairman

22.09.2015

Appellant with counsel, M/S Khurshid Khan, SO and Muhammad Akram, Supdt. alongwith Addl: A.G for respondents present. Learned Addl. AG informed the Tribunal that the grievances of the appellant are going to be redressed as process has been initiated to this effect. Both the parties seek adjournment. Adjourned to 11.11.2015 for further proceedings before S.B.


Chairman

11.11.2015

Appellant with counsel, M/S Sharifullah, ADO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity is extended subject to payment of cost Rs. 500/- which shall be borne by the respondents for their own pockets. To come up for written reply/comments and cost on 27.1.2016 before S.B.


Member

13.03.2015

Counsel for the appellant and Mr. Mosam Khan, AD for respondents No. 2 and 3 alongwith Addl: A.G for all respondents including respondents No. 1 to 4 present. Requested for adjournment as respondents No. 1 and 4 are not in contact with the learned Addl: A.G. Last opportunity granted for submission of written reply as well as reply to application. Adjourned to 4.6.2015 before S.B.


Chairman

04.06.2015

Counsel for the appellant and Mr. Akram Khan Supdt alongwith Addl: AG for the respondents present. The learned AAG submitted that there are three appeals in which written statements have to be submitted and further that same material facts of the case needs probe for which reasons the written reply could not be timely prepared. In this regard it was explained that the respondent-department does not admit that the appellants were ever appointed in the stated position, adjournment granted to respondent-department. Another last opportunity granted for submission of written reply as well as reply to application. Adjourned to 28.07.2015 before S.B.


Member

17.09.2014

Counsel for the appellant, and Mr. Kabeerullah Khattak, Asstt. A.G with Sajjad Rashid, AD, Akram Marwat Supdt. and Imdad Senior Auditor for respondents present and requested for further time. To come up for written reply on 04.12.2014.



MEMBER

4.12.2014

Appellant in person and Mr. Muhammad Jan, GP with representatives of the respondents present. The Tribunal is incomplete. To come up for the same on 15.1.2015.



READER

15.1.2015

Appellant in person and Mr. Muhammad Adeel Butt, AAG with Akram Marwat, Supdt. and Mosam Khan, AD for the respondents present. Representatives of the respondents requested for further time for submission of written reply. Application for release of salary already submitted on behalf of the appellant, copy whereof is handed over to the learned AAG. To come up for written reply on main appeal as well as reply/arguments on application on 13.3.2015.

MEMBER



MEMBER

19.06.2014

*Appeal No. 483/2014
Mr. Gul Badshah*

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Appellant was appointed on 21.01.2013 as PST in BPS-12. As such he took over charge on 01.03.2011 and since then she properly performing duty he filed departmental appeal on 06.01.2014 against the non receipt of salary which the Section-17 of the Khyber Pakhtunkhwa Civil Servant, Act 1973 provides that the Civil Servant appointed to a post shall be entitled, in accordance with the Rules to the pay sanctioned for such post. Hence non receipt of pay at the end of every month is a recurring loss to the appellant which could be treated as original order. The departmental appeal dated 06.01.2014 is not responded within the statutory period of 90 days, hence the present appeal on 08.04.2014.

The learned Government Pleader while assisting the court was of the view that there is not final order and no departmental appeal. He further relied on 2006 SCMR 1630 (a) that an appeal to the Tribunal shall always be against the final order, hence the appeal is not maintainable.

Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 17.09.2014.

Member

This case be put before the Final Bench 11 for further proceedings.

Chairman

19.06.2014

*Appellant deposited
Process fee Security
Rs. 350/- Bank Receipt
attached with file.*

Before The Service Tribunal, IC P, Peshawar.

Gul Badshah vs D.E.O of others

ANo 493/2014.

F-11
4-12-14
792
17-9-14

Application for Release of Current Monthly Salaries

Respectfully Sheweth,

1. That since the ~~appetto~~ Appointment of the appellanti till date, the appellanti is serving as PST at GPS, Wanda Faqeeran, Ahmad khet, Lakki Marwala.
2. That the Respondents despite of several written and verbal requests are not paying the monthly salaries to the appellanti.
3. That for the purpose of salaries, the appellanti has filed appeal in which next date of hearing is 4/12/14 for reply of the respondents.
4. That getting salary is the vested right of the appellanti.

It is therefore requested that the request respondents be directed to start the payment of current monthly salaries to the appellanti till the disposal of main appeal.

Dr. 17/9/14
"Our
Appellant/Applicant
Arbab Saif ul Haque"

Before the Service Tribunal, K P, Peshawar.

Gul Badshah vs. D.E.O. & others

Application for Release of Current Monthly Salaries

Respectfully Sheweth,

1. That since the ~~appellate~~ Appointment of the appellants till date, the appellants is serving as PSI at GPS, Wanda Fageran, Ahmad Khet, Lakki Marwala.
2. That the Respondents despite of several written and verbal requests are not paying the monthly salaries to the appellants.
3. That for the purpose of salaries, the appellants has filed appeal in which next date of hearing is 4/12/14 for reply of the respondents.
4. That getting salary is the vested right of the appellants.

It is therefore requested that the request respondents be directed to start the payment of current monthly salaries to the appellants till the disposal of main appeal.

Appellants/Applicants
Arbab Saif ul Haq

DT 17/9/14

3
04.06.2014


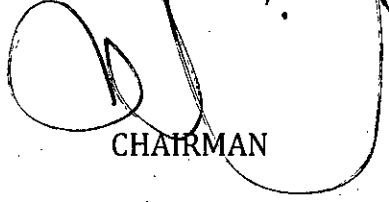
Counsel for the appellant present. Preliminary arguments partly heard. Pre-admission notice be issued to the learned GP to assist the Tribunal. To come up for preliminary hearing on 19.06.2014.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 493/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08/04/2014	<p>The appeal of Mr. Gul Badshah presented today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	15-4-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>5-6-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 493 /2014

Gul Badshah

Versus

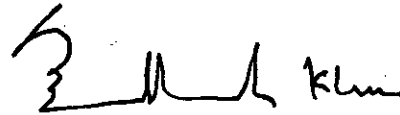
D.E.O & others

I N D E X

S.#	Description of Documents	Annex	Page
1.	Memo of Appeal		1-2
2.	Appointment Order, 21.01.2013	"A"	3
3.	Charge Report, 01.03.2013	"B"	4
4.	Attendance Register,	"C"	5-13
5.	Representation, 06.01.2014	"D"	14

Appellant

Through



Dated: 8.04.2014

(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. 493 /2014

Gul Badshah S/o Yousaf Jan,
PST, GPS, Wanda Faqeeran,
Inside Ahmed Khel, Lakki Marwat Appellant

Versus

1. District Education Officer (Male), Elementary & Secondary Education, Lakki Marwat.
2. Director of Education, Directorate of Elementary & Secondary Education, KP, Peshawar.
3. Secretary, Government of KP, Elementary & Secondary Education Department, Peshawar
4. District Accounts Officer, Lakki Marwat Respondents

W. J. P. Peshawar
517
08/4/14

⇔<=>⇔<=>⇔<=>⇔<=>⇔

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 WHEREBY MONTHLY SALARIES OF APPELLANT SINCE 21.01.2013 AND ONWARD WERE WITHHELD FOR NO LEGAL REASON.

⇔<=>⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth:

1. That after observing the due codal formalities and having the requisite educational qualifications, appellant was appointed as PST, B-12 by R. No. 1. on the recommendation of Departmental Selection Committee vide order dated 21.01.2013. (Copy as annex "A")
2. That on 01.03.2013, charge of the assignment was assumed at GPS, Wanda Faqeeran, Ahmed Khel, Lakki Marwat. (Copy as annex "B")
3. That since the date of appointment till date, appellant is performing his official duties at the said school with devotion which proof is Teachers Attendance Register of the school. (Copies as annex "C")

W. J. P. Peshawar
8/4/14

4. That on 06.01.2014, appellant submitted representation before R. No. 2 for release and payment of monthly salaries but of no avail. (Copy as annex "D")


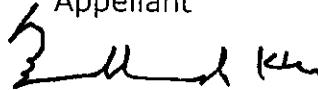
Hence this appeal, inter alia, on the following grounds:-

GROUNDS:

- a. That having the requisite educational qualification and by going through the prescribed procedure of selection, appellant was appointed as PST in B-12 on the recommendation of the Departmental Selection Committee.
- b. That till date, appellant is performing his official duties at the said school by marking himself present in the school.
- c. That similarly placed other colleagues of appellant numbering dozens were paid monthly salaries by the department and those who were refused, approached this Hon'ble Tribunal for release of their monthly salaries and then the Hon'ble Tribunal was pleased to accept the same, directing respondents to pay them salaries and then the same were paid from the date of their appointments.
- d. That as per law, rules and judgments of the Superior Courts, similarly and equally placed persons be treated similarly and equally to avoid discrimination.
- e. That the act of the respondents by not paying monthly salaries to appellant is based on ulterior motive and discrimination.

It is, therefore, most humbly prayed that on acceptance of the appeal, respondents be directed to release monthly salaries of appellant since 21.01.2013, and onward too, with such other relief as may be deemed proper and just in circumstances of the case.

Dated: 8 .04.2014


Appellant
Through 
Saadullah Khan Marwat


Arbab Saif-ul-Kamal

& 
Miss Robina Naz,
Advocates,

A

3

21-1-13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) LAKKI MARWAT
APPOINTMENT ORDER

In compliance of decision of Honourable Peshawar High Court Bench Bannu with reference No 196/2012, dated 25/05/2012, the appointment of the below named candidate is hereby ordered as Primary School Teacher (M) in BPS-12 (Rs 7000-500-22000) plus usual allowances as admissible under the rules on regular basis, under the provision of Establishment & Administration Department Circular bearing No. SOR-6(E&AD)13-01/2005 dated 10-08-2005 on the terms & conditions given below, in the interest of public service from the date of taking over charge.

S.No	Name	Father name & address	To be posted at	Remarks
1	Gul Bad Shah	Yousaf Jan R/o Shah Hassan Khel	GPS Wanda Faqiran Dakhli Ahmad khel	-do-

TERMS & CONDITIONS:

1. His appointment will be considered without pension and gratuity in terms of section 17 of NWFP Civil Servant Act 1973, as amended vide NWFP Civil Servant (Amendment) Act 2005 but the candidates already working as permanent Govt Servants, will under take whether they want to continue the benefits of old service or new, he will however be entitled to contributory provident fund in such a manner and such a rate as may be prescribed by Govt.
2. In case of resignation without notice two months pay/allowance will be refunded to him.
3. His services will be governed by such rules and regulations as may be issued by Govt from time to time.
4. His services will be terminated at any time in case their performance is found to be unsatisfactory during probationary period; in case of misconduct they will be proceeded against the Khyber Pakhtunkhwa Govt Servants (efficiencies and discipline) rules 2011 and the rules framed from time to time.
5. Charge reports should be submitted to all concerned.
6. No TADA is allowed.
7. The undersigned will check and verify the certificates degree of above candidate from the concerned Boards/Universities before the drawal of their pay.
8. The appointee is directed to take over charge in March 2013.
9. The undersigned reserve the rights of amendment in case of any amendment.
10. He is required to produce health and age certificate from medical superintendent at G.P.O hospital Lakki Marwat.

(Mir Azam Khan)
District Education Officer
(Male) Lakki Marwat

Dated 21/1/13

Endst No. 490-93
Copy to the

1. Director File & Sec: Education Deptt Khyber Pakhtunkhwa, Peshawar
2. District Accounts Officer Lakki Marwat
3. Sub Divisional Education Officer (M) Primary local office
4. Head Teacher school concerned

جان دھورت

40

حکم موعوب 490-93 آرڈر آر آر آر آر دفتر دست

21.1.13

دیپٹی کمشنر لاکھی ماروات

انام گل بادشاہ کی تصنیفی بحیثیت PST یوٹھاپے

انام گل بادشاہ نے بطور فرائض 01-03-2013 قبل از نوپس

موجودہ فرائض میں رہتے ہوئے انام گل کی ترقی حاصل کیا

لہذا وہی عدد جان دھورت اور سال فروری

دستور جان دھورت

کمالیہ

[Signature]

A.S.D.E.O ('C')
Mina Khel Lakkhi Marwat

دستور جان دھورت

[Signature]

HEAD TEACHER
P.S. Mandi Fajra
Dist: Lakkhi Marwat

01-03-2013

[Signature]

2013ء

رجسٹر حاضری مدرسہ سین ماہی قمران بابت ماہ اپریل

نمبر	عبدالعلی خان	طلحہ نواز خان	وحید اللہ	مل ناز شاہ
نمبر	P.S.H.T	S.P.S.T	P.S.T	P.S.T
نمبر	آمد	دستخط	رواگی	دستخط
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3	تعطیلت موسم بہار			
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11	8:00	7:30	7:30	8:00
12	on duty	7:30	7:30	8:00
13	8:00	Polio duty	7:30	7:30
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22		Polio meeting		
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25		7:30		
26	26 To 27	Polio duty		
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29		Polio Duty		
30		S/leave		
31				

By order of
S/O Transferred
to Zarif

By the order of
S/O Transferred
to Zarif

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to Zarif

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HEAD TEACHER
S.P.S Wanda Faqiren

رجسٹر حاضری مدرسین

بابت ماہ ستمبر 2013ء

وحدہ اولیہ			ف.س.ت			ف.س.ت			وحدہ اولیہ		
نام	روز	وقت	نام	روز	وقت	نام	روز	وقت	نام	روز	وقت
1	Sunday										
2	Monday	7:30	Monday	7:30	7:30	Monday	7:30	7:30	Monday	7:30	7:30
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8	Sunday										
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15	Sunday										
16	Monday	7:30	Monday	7:30	7:30	Monday	7:30	7:30	Monday	7:30	7:30
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18	Wednesday	7:30	Wednesday	7:30	7:30	Wednesday	7:30	7:30	Wednesday	7:30	7:30
19	Thursday	7:30	Thursday	7:30	7:30	Thursday	7:30	7:30	Thursday	7:30	7:30
20	Friday	7:30	Friday	7:30	7:30	Friday	7:30	7:30	Friday	7:30	7:30
21	Saturday	7:30	Saturday	7:30	7:30	Saturday	7:30	7:30	Saturday	7:30	7:30
22	Sunday										
23	Monday	7:30	Monday	7:30	7:30	Monday	7:30	7:30	Monday	7:30	7:30
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26	Thursday	7:30	Thursday	7:30	7:30	Thursday	7:30	7:30	Thursday	7:30	7:30
27	Friday	7:30	Friday	7:30	7:30	Friday	7:30	7:30	Friday	7:30	7:30
28	Saturday	7:30	Saturday	7:30	7:30	Saturday	7:30	7:30	Saturday	7:30	7:30
29	Sunday										
30	Monday	7:30	Monday	7:30	7:30	Monday	7:30	7:30	Monday	7:30	7:30
31											

Seen
 25/9/2013
 H.S. Ahmed Khel

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان
		2			3			3			

دستخط ہیڈ ماسٹر

HEAD TEACHER

رجسٹر حاضری مدرسہ سنہ ۱۴۳۱ھ یازمان یابت ماہ اکتوبر ۲۰۱۳ء

رقم	نوع	نوع	نوع	نوع	نوع	نوع	نوع
نوع	نوع	نوع	نوع	نوع	نوع	نوع	نوع
1	8:30	1:35	8:30	1:35	8:30	1:35	8:30
2	8:30	1:35	8:30	1:35	8:30	1:35	8:30
3	8:30	1:35	8:30	1:35	8:30	1:35	8:30
4	8:30	1:15	8:30	1:15	8:30	1:15	8:30
5	8:30	1:35	8:30	1:35	8:30	1:35	8:30
6	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday
7	8:30	1:35	8:30	1:35	8:30	1:35	8:30
8	8:30	1:35	8:30	1:35	8:30	1:35	8:30
9	8:30	1:35	8:30	1:35	8:30	1:35	8:30
10	8:30	1:35	8:30	1:35	8:30	1:35	8:30
11	8:30	1:15	8:30	1:15	8:30	1:15	8:30
12	8:30	1:35	8:30	1:35	8:30	1:35	8:30
13	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday
14	8:30	1:35	8:30	1:35	8:30	1:35	8:30
15							
16	عطریب عبداللہی		18 تا 15				
17							
18							
19	8:30	1:35	8:30	1:35	8:30	1:35	8:30
20	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday
21	8:30	1:35	8:30	1:35	8:30	1:35	8:30
22	8:30	1:35	8:30	1:35	8:30	1:35	8:30
23	8:30	1:35	8:30	1:35	8:30	1:35	8:30
24	8:30	1:35	8:30	1:35	8:30	1:35	8:30
25	8:30	1:15	8:30	1:15	8:30	1:15	8:30
26	8:30	1:35	8:30	1:35	8:30	1:35	8:30
27	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday	Sunday
28	8:30	1:35	8:30	1:35	8:30	1:35	8:30
29	8:30	1:35	8:30	1:35	8:30	1:35	8:30
30	8:30	1:35	8:30	1:35	8:30	1:35	8:30
31	8:30	1:35	8:30	1:35	8:30	1:35	8:30

See
 11/11/2013
 H.M.
 A.H.S Ahmed Khel

حالت	میزان	حالت	میزان	حالت	میزان	حالت	میزان
حالت	2	حالت	3	حالت		حالت	
استحقاق		استحقاق		استحقاق		استحقاق	
میزان		میزان		میزان		میزان	

H.M.
 by

2013ء

رجسٹر حاضری مدرسہ سیدین گورنمنٹ بابت ماہ نومبر

نام	وسم	ظلم	باز	باز	ظلم	نام	وسم	ظلم	باز	باز	ظلم
عہدہ	P.S.T	P.S.T	P.S.T	P.S.T	P.S.T	عہدہ	P.S.T	P.S.T	P.S.T	P.S.T	P.S.T
تاریخ	آمد	دستخط	رواگی	دستخط	آمد	تاریخ	آمد	دستخط	رواگی	دستخط	آمد
1	8:30				8:30	1	8:30				8:30
2	8:30				8:30	2	8:30				8:30
3	Sunday				Sunday	3	Sunday				Sunday
4	8:30				8:30	4	8:30				8:30
5	8:30				8:30	5	8:30				8:30
6	توطیر از رسم الام				توطیر از رسم الام	6	توطیر از رسم الام				توطیر از رسم الام
7	8:30				8:30	7	8:30				8:30
8	8:30				8:30	8	8:30				8:30
9	یوم اقبال				یوم اقبال	9	یوم اقبال				یوم اقبال
10	Sunday				Sunday	10	Sunday				Sunday
11	8:30				8:30	11	8:30				8:30
12	8:30				8:30	12	8:30				8:30
13	8:30				8:30	13	8:30				8:30
14	توطیر از رسم الام				توطیر از رسم الام	14	توطیر از رسم الام				توطیر از رسم الام
15	توطیر از رسم الام				توطیر از رسم الام	15	توطیر از رسم الام				توطیر از رسم الام
16	8:30				8:30	16	8:30				8:30
17	الوار				الوار	17	الوار				الوار
18	8:30				8:30	18	8:30				8:30
19	8:30				8:30	19	8:30				8:30
20	8:30				8:30	20	8:30				8:30
21	8:30				8:30	21	8:30				8:30
22	8:30				8:30	22	8:30				8:30
23	8:30				8:30	23	8:30				8:30
24	یوم اقبال				یوم اقبال	24	یوم اقبال				یوم اقبال
25	8:30				8:30	25	8:30				8:30
26	8:30				8:30	26	8:30				8:30
27	8:30				8:30	27	8:30				8:30
28	8:30				8:30	28	8:30				8:30
29	8:30				8:30	29	8:30				8:30
30	8:30				8:30	30	8:30				8:30
31						31					

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان
اتفاقہ	-	3	2	2	4	اتفاقہ	-	3	2	2	4
اختلاف						اختلاف					
بیاری						بیاری					
میزان						میزان					

دستخط ہیڈ ماسٹر
 HEAD TEACHER
 G.B.S Wanda Foukan

رجسٹر حاضری مدرسین ^{مدرسه} نور ان بابت ماہ دسمبر 2013ء

نام	عہدہ	تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
-----	------	-------	-----	-------	-------	-------	-----	-------	-------	-------

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
عبدالمعین خان	P.S.H.T																													
محمد نواز خان	S.P.S.T																													
گل بادشاہ	P.S.T																													
الگو		الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو	الگو
آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی

محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
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 محمد نواز خان
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 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
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 محمد نواز خان
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 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T
 محمد نواز خان
 S.P.S.T

محمد نواز خان
S.P.S.T

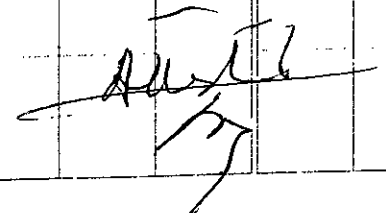
حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان
		4			3			3			

دستخط ہیڈ ماسٹر

رجسٹر حاضرین مدرسہ سیدین فیضیہ بابت ماہ جنوری 20/4ء

تاریخ	آدم			روانگی			دستخط			نمبر
	آدم	دستخط	روانگی	آدم	دستخط	روانگی	آدم	دستخط	روانگی	
1	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	1
2	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	2
3	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	3
4	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	4
5	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	5
6	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	6
7	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	7
8	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8
9	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	9
10	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	10
11	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	11
12	Sunday			Sunday			Sunday			12
13	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	13
14	Sunday			Sunday			Sunday			14
15	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	15
16	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	16
17	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	17
18	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	18
19	Sunday			Sunday			Sunday			19
20	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	20
21	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	21
22	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	22
23	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	23
24	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	24
25	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	25
26	Sunday			Sunday			Sunday			26
27	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	27
28	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	28
29	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	29
30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	30
31	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	31

حاضر	حال	سابقہ	میزان	حاضر	حال	سابقہ	میزان	حاضر	حال	سابقہ	میزان	حاضر	حال	سابقہ	میزان



رجسٹر حاضری مدرسہ اسلامیہ فیض آباد بابت ماہ فروری 2014ء

نمبر	علی نواز خان			وصیر الہ			علی بادشاہ خان			علی رمضان		
	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	On duty			8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
2	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
3	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
4	9/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
5												
6												
7	Training			8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
8				8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
9												
10	Room & Tu			8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
11				8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
12				8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
13				8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
14				8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30
15	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
16	Sunday											
17	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
18	9/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
19	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
20	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
21	9/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
22	C/Leave											
23	Sunday											
24	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
25	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
26	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
27	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
28	8/30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ	8:30	وصیر الہ	1:35	وصیر الہ
29												
30												
31												

حرف	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقية	1	-	1	1	-	1	-	-	1	-	-	1
استحقاق												
بماری												
میزان												

دستخط ہیڈ ماسٹر

رجسٹر حاضری مدرسین سیدین سمران بابت ماہ مارچ 2014ء

نام	چل کوزلوان			و حیدر آباد			صل بادشاہ			نام
	آمد	دستخط	روایتی	آمد	دستخط	روایتی	آمد	دستخط	روایتی	
1										
2										
3	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
4	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
5	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
6	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
7	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
8	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
9										
10	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
11	8/30	11/35	8/30							
12	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
13	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
14	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
15	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
16										
17	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
18	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
19	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
20	8/30	11/35	8/30	8/30	11/35	8/30	8/30	11/35	8/30	
21	8/30	11/35	8/30							
22										
23										
24										
25										
26										
27										
28										
29										
30										
31										

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان

Seen P. C. 15/3/2014

Atty

خدمتِ ضیاء دائرہ تبلیغ ایبٹینہ ای ای کے در

اسل بابت ادا بیگی تجر ادھات

— X —

ضیاء عالمی - ذیل گزارش ہے۔

۱۔ ۱۳۱۳ء تمام قانونی لوازمات کی تکمیل کے بعد سابق مورخہ ۲۱/۱۳ کو مجتبیٰ پرائمری سکول چٹوڑی ۱۲-۱۳ میں ڈی ای او عطیت نے پورا کافرمان جاری کیا اور ۱۳/۳ کو مذکورہ رسانی کا گورنمنٹ پرائمری سکول دائرہ فقیران میں جاری کیا۔

۲۔ ۱۳۱۳ء تاریخ تقریباً لیکچر ایک ایسی فرانس منجھی ادارہ تاریخی مین ماہیوار تجر ادھات سے بلا کسی عذر و وجہ کے شروع رکھا گیا ہے۔

۳۔ ۱۳۱۳ء محکمہ نے نہ صرف سابق کے ساتھ بلکہ دیگر متعدد معلمین کے ساتھ ایسی رویہ برقرار رکھا۔ تاہم بعض کو سناؤ، شہادت اور بعض نے قافلہ ٹرنوئل نے ضرورتاً فرسے ماہیوار تجر ادھات ادارہ دیے۔

۴۔ ۱۳۱۳ء ماہیوار تجر ادھات بعض اساتذہ کو دینا اور بعض کو نہ دینا منہ پر امتیاز و بدینہی ہے۔

اسدعا ہے کہ سابق مورخہ ۱۲/۱۳ ناصل دائرہ تبلیغ ماہیوار تجر ادھات ادارہ کے کالج ماہیوار چٹوڑی ۱۳ دعا و سہارا

مظاہرہ مورخہ ۱۴/۶

جیل بادشاہ ولہر پورٹ جان پرائمری سکول پست (PST) گورنمنٹ پرائمری سکول دائرہ فقیران داخلہ اعلیٰ

ملکی خدمت

تعمیرت
۱۳

بعد التّ جناب سروریں ٹریبونل صوبہ سرحد پشاور

مخانب اسلٹ

ملک بادشاہ بنام

دعویٰ اصل

باعث شکریہ اینکہ

مقررہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکیل کاروائی متعلقہ آن مقام پشاور کیلئے سعد اہلسا خان سرور نے ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے رضی نامہ و تقرر ثالث و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور رضی دعویٰ اور درخواست ہر قسم کا تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برکدگی اور تفسیحی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مشاور قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شاہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر واختہ منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام درہ پربہو یا مد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المترقوم

العبد

العبد

العبد

سید ال
ارباب سید اکمال
ایڈووکیٹ

سید اللہ خان مرقت
ایڈووکیٹ

علی بادشاہ

May 28
من رومیہ ناز
ایڈووکیٹ

Before The Service Tribunal, K P, Peshawar.

Gul Badshah vs D.E.O. of others

Application for Release of Current Monthly Salaries

Respectfully Sheweth,

1. That since the ~~Appetto~~ Appointment of the appellanti till date, the appellanti is serving as PST at GPS, Wanda Faqeeran, Ahmad Khet, Lakki Marwal.
2. That the Respondents despite of several written and verbal requests are not paying the monthly salaries to the appellanti.
3. That for the purpose of salaries, the appellanti has filed appeal in which next date of hearing is 4/12/14 for reply of the respondents.
4. That getting salary is the vested right of the appellanti.

It is therefore requested that the request respondents be directed to start the payment of current monthly salaries to the appellanti till the disposal of main appeal.

Yours
Appellanti/Applicant
Arbab Saif ul Kamal

ضیاب صہریہ میں سروس ٹریننگیوں کی طرف سے (لکھنؤ)

ضیاب علی ا

نوڈیاتیہ ایشیاس ہے۔ کہ سالانہ عرصہ دراز سے ٹھکانے

میں کینیڈا کے رہنے والے ہیں جس کا آغاز 2014 کا ہوا ہے۔

اور تاحال (Reply) میں حاصل رہا ہے۔ - ٹھکانے کی تلاش

میں مروت والے جواب دہوں نے نہیں پیش کر رہا ہے۔

کندھار صابان مہربانی فرما کر ہم سالانہ کینیڈا کے ٹھکانے

عدالتوں کی ~~دھمکی~~ دھمکی مار رہے ہیں۔ تقریباً (31 ماہ)

ہو چکے ہیں کہ ہم نے ٹھکانے کو کھری ہے۔ - جوڑے جوڑے بچوں پر ہراس کی کارڈ کر رہا

یکم مارچ 2013 سے 22/9/2015 تک مدت - عین نواز شاہ کی

سروسز میں -
دفعہ 22/9/2015

سالانہ ~~الکاتی~~ -
PST = جب الکتی

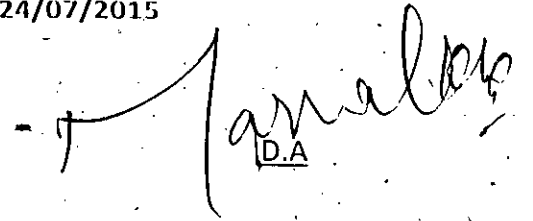
- ② وشمیر اللہ PST
- ③ گل بادشاہ PST

CERTIFICATE

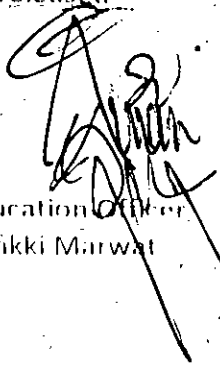
Certified that the pay of Mr. Gul Badshah appointed as PST Post in GPS Wanda Faqiran Dakhli Ahmad Khel at S.No-01 vide this office Endst.No.490-93 dated. 21/01/2013 (Photo copy of appointment is attached) is hereby released subject to the verification of their documents if not already verified with the direction to SDEO Male to submit report and initiate proceedings if any other irregularity is there in his appointment.

The SDEO Male is required to ensure and fulfill his responsibility in this regard with immediate effect.

Hence, his pay released ordered this day Dated 24/07/2015


D.A

Pay released:



District Education Officer
(Male) Lakki Marwat

A

3

21-1-13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) LAKKI MARWAL
APPOINTMENT ORDER

In compliance of decision of Honourable Peshawar High Court Bench Bannu, writ petition No 196/2012, dated 25/05/2012, the appointment of the below named candidate is hereby order as Primary School Teacher (M) in BPS-12 (Rs 7000-500-22000) plus usual allowances as admissible under the rules on regular basis, under the provision of Establishment & Admissions Department circular bearing No. SOB-6(F&AD)13-01/2005 dated 10-08-2005 on the terms & conditions given below in the interest of public service from the date of taking over charge

S.No	Name	Father name & address	To be posted at	Remarks
1	Gul Bad Shah	Yousaf Jan R/o Shah Hassan Khel	GPS Wanda Faqiran Dakhli Ahmad khel	-do-

TERMS & CONDITIONS:

1. His appointment will be considered without pension and gratuity in terms of service under NWFP Civil Servant Act 1973, as amended vide NWFP Civil Servant (Amendment) Act 2005 but the candidates already working as permanent Govt. Servants, will under take whether they want to continue the benefits of old service or new, he will however be entitled to contributory provident fund in such a manner and such a rate as may be prescribed by Govt.
2. In case of resignation, without notice two months pay/allowance will be refunded to him.
3. His service will be governed by such rules and regulations as may be issued by Govt. from time to time.
4. His service will be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct they will be liable against the Khyber Pakhtunkhwa Govt. servants. The provisions of disciplinary rules and the rules framed from time to time.
5. Charge reports should be submitted to all concerned.
6. No TA/DA is allowed.
7. The under signed will check and verify the certificates deputed of above candidate to the concerned Boards/Universities before the drawl of their pay.
8. The appointee is directed to take over charge in March 2013.
9. The under signed reserve the rights of amendment in case of any mistake.
10. He is required to produce health and age certificate from medical superintendent (M) hospital Lakki Marwat.

(Signature)
District Education Officer
(Male) Lakki Marwat

Date: 21/1/13

Enclst No: 490-93
Copy to the

1. Director (E) & Sec: Education Dept Khyber Pakhtunkhwa, Peshawar
2. District Education Officer Lakki Marwat
3. Sub Divisional Education Officer (M) Primary school office
4. Head Teacher school concerned

(Signature)

(Signature)
Lakki Marwat

BEFORE THE SERVICE TRIBUNAL GOVT. OF KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No: 493 / 2014

Mr: Gul Badshah

..... Appellant

Versus

District Education Officer (Male) District Lakki & Two other

..... Respondents

Joint Para Wise Comments On Behalf Of Respondent 1,2 & 3

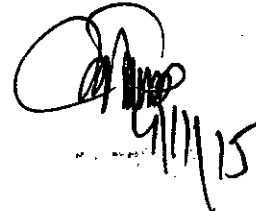
Respectfully Sheweth;

Preliminary Objections: -

- 1). That the appellant has no cause of action and locus standi to bring the present appeal.
- 2). That the appeal of the appellant is not maintainable as the appellant is not a civil servant.
- 3). That the appellant has not come to the Honourable court of Service Tribunal with clean hands as he has concealed material facts like advertisement of 2007, 12th position in final merit list where only three posts were available for appointment in UC Ahmad khel & not consideration in DSC meeting with lowest score of 48.84.
- 4). That the appeal of the appellant is bad for mis-joinder and non-joinder of necessary parties .
- 5). That the appellant has come to the court with malafide intention because as per legal maxim "legal procedure can only be proceeded on valid documents", the documents so provided by the appellant are not verifiable.
- 6). That any departmental action against the appellant could not be taken by presenting fabricated/forged appointment letter and claiming salary as the appellant have involved the Deptt. in un-necessary litigation therefore due to Res-sub judice nature no action has been taken.

FACTS:-

- 1). In correct being concocted , hence denied.
- 2). False and concocted, hence denied. The appellant has never been appointed by the Respondents.
- 3). In correct being concocted, hence denied, there is no Head Master but a Head Teacher in the Primary schools, the ASDEO(C) is empowered under


.....

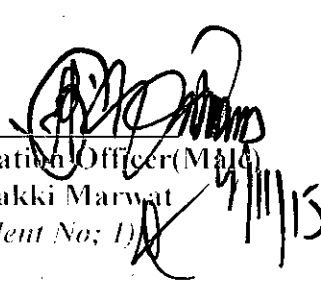
the law to put signatures on the attendance Register in his supervisory capacity .

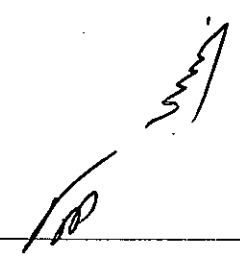
- 4). Correct to the extent of his appeal , however, an inquiry on the subject matter was suggested by the law Department , however, as the matter was pending subjudice before KPK Service Tribunal, hence no findings are arrived so far.


GROUNDS:-

- a). Incorrect. As replied in para 4 of the PRELIMINARY OBJECTIONS.
- b). Incorrect. No duty whatsoever has performed by him.
- c). Incorrect. Every case has different nature and facts but all such appointments which were illegal and fake are pointed out by Provincial Inspection Team (copy of PIT inquiry is enclosed as Ref: "A"), Inquiry so conducted is sent to NAB by Secretary E&SED KPK and directed the appointing authority to take action and make calculation for recovery of pay(copy of NAB & Secretary E&SED are enclosed as Ref: "B", "C" & "D").
- d). No comments.
- e). As per Para NO.1 & 4.

It is therefore humbly prayed that on acceptance of these para-wise comments this Honourable Court of Service Tribunal may very graciously be pleased to dismiss the instant appeal with costs through out.


District Education Officer(Male)
District Lakki Marwat
(Respondent No; 1)


Director(E&SE)KPK
(Respondent No; 2)


Secretary E&SED KPK
(Respondent No; 3)

Affidavit

Solemnly affirm and declare on oath that the contents of the above application are true and correct to the best of my knowledge and belief.

DEPONENT _____

(91)

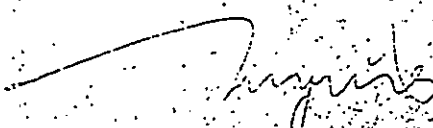
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No. SO(S/M) E&SED/4-17/2011/Noor.Hassan/Ex-DEO & Others
Dated Peshawar the April 17, 2014

The District Education Officer (Male)
Lahore

PROVISION OF RECORD/ INQUIRY REGARDING IRREGULAR
APPOINTMENT IN DIFFERENT BY THE EX-DEO (NOOR HASSAN KHAN)

For information to refer to your letter No. 132 dated 25-03-2014 on the subject noted above and to forward herewith a copy of inquiry report conducted by Mr. Muhammad Humayun Khan, Chairman Financial Inspection Team, for assisting HAB in their investigation.


(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

Copy of the above is forwarded to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar. He is requested to keep a close liaison with the responsible officer/ official.
2. Officer Incharge (Complaint Cell) National Accountability Bureau Block III, PDA Complex Phase-V, Hayatabad, Peshawar. With reference to his letter No. 32/1/1537/11/HQ/(CC)/NAB(KPK)/331 dated 16-12-2013.
3. PS to Secretary, E&SE Department Khyber Pakhtunkhwa Peshawar.
4. SO to Special Secretary, E&SE Department Khyber Pakhtunkhwa Peshawar.

SECTION OFFICER (SCHOOLS/MALE)

P-6

(90)
CONFIDENTIAL



Provincial Inspection Team K.P

Block No. 15, Attached Department Complex,
Khyber Road, Peshawar Cantt.

Tele: 9210956-9212270

No. 241/INSP/By Name Inq/PIT/2013/

Dated: March 01, 2013

To

✓
The Secretary to
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education,
Peshawar.

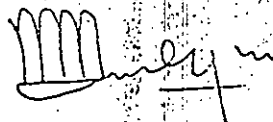
Attention: Section Officer (Schools/Male)

Subject: Inquiry Regarding Irregular Appointments in Different
Cadres in EDO (E&SE) Office Lakki Marwat.

Memo:

I have honour to refer your Notification No. SO(S/M)
E&SE/4-17/2012/Noor Hassan Khan, Ex-EDO Lakki dated 31.12.2012
on the subject cited above to forward herewith a copy of inquiry report
regarding irregular appointments in different cadres made by Mr. Noor
Hassan Khan, Ex-EDO Lakki Marwat containing (Twenty Two) pages
alongwith (39) Annexures in two volume for further necessary action at
your end.

2. Kindly acknowledge.


1-3-13

Muhammad Humayun
Chairman, PIT.

Encl: Report 1 to 22 pages
Annex: A to AM

CONFIDENTIAL

SUBJECT:- INQUIRY REGARDING IRREGULAR APPOINTMENTS IN DIFFERENT CADRES IN EDO (E&SE) OFFICE LAKKI MARWAT

According to the Elementary & Secondary Education Department Notification No SO(S/M) E&SE/4-17/2012/Noor Hassan Khan, Ex EDO, Lakki Marwat, dated 31.12.2012, the Chief Minister KPK was pleased to appointment the undersigned as Inquiry Officer to conduct inquiry regarding irregular appointments in different cadres and other irregularities mentioned in the Charge Sheets and submit report within one month (Annexure-A). Letter in question was received on 08.01.2013. All the accused were asked through registered letter for submission of written replies within seven days failing which it shall be presumed that they had no defence to put in & in that case ex-parte decision shall be taken (Annexure-B). The Elementary & Secondary Education Department nominated Mr. Mujeeb-ur-Renman, Section Officer (Schools/Male) as departmental representative to assist and appear before the committee along with relevant record (Annexure-C).

A) MR. NOOR HASSAN KHAN:

Mr. Noor Hassan Khan was appointed as EDO (E&SE) Lakki Marwat with effect from 14-03-2009. He served as EDO till 28-02-2011. Subsequently he was posted as Principal, GHSS Khaweshgi, District Nowshera. According to his date of birth he stood retired from service with effect from 17-10 2012. In the light of FR 54-A no action can be taken against a retired civil servant after retirement from service. However department has to register an FIR with local police for recovery of loss caused to Provincial exchequer (Annexure-D). Since a number of Officials are involved therefore it is decided to conduct inquiry and submit report. Loss caused by the Ex-EDO to public exchequer may be recovered from him by registering an FIR with local police.

According to Charge Sheet Mr. Noor Hassan Khan, Ex-EDO (E&SE) Lakki Marwat now Principal GHSS Khaweshgi Payan District Nowshera has been charged as under:-

"Committed irregularity of illegal appointments in different cadres in violation of merit, Government policy and procedures in the office of EDO (E&SE) Lakki Marwat" —

He in his written reply dated 17-1-2013 stated that he joined Education Department in October, 1973 as SV Teacher. He served in various capacities (Annex- E). He added that all the orders have been issued in accordance with rules, regulations & policy of the Government. All the codal formalities were fulfilled before filling vacancies. He always followed rules and regulations therefore he may be exonerated. During the month of May, 2010 applications were invited for various posts through daily "Aaj" dated 11-05-2010 (Annexure-F). A large number of candidates applied for various posts. According to selection

(88)

criteria 100 marks have been distributed as per detail given below:-

Academic qualification	= 100 marks*
<u>Academic qualification</u>	
SSC or equivalent	marks obtainedx30/total marks
HSSC or equivalent	marks obtainedx20/total marks
PTC	marks obtainedx30/total marks
<u>Additional qualification</u>	
BA/BSc or equivalent	marks obtainedx10/total marks
MA/MSc or equivalent	marks obtainedx5/total marks
Experience	marks obtainedx5/total marks
<hr/>	
Total marks	= 100

During checking of record it was noticed that the posts of TT, AT (Females) and PST (Male) were kept vacant for the reasons that Peshawar High Court, D.I Khan Bench has issued stay order (Annex-G). However appointments have been made against the posts of TT (Female) & PST (Male) in violation of court orders.

2) Mr. Muhammad Ayub Khan, District Officer(M) Lakki/Marwat

Muhammad Ayub Khan is working as District Officer (Male), Lakki Marwat with effect from 24-4-2008. He was charged as follow:-

"Being member of DSC committee committed irregularity by signing fictitious and fake merit list and approved some illegal quotas in violation of merit, Government policy and procedures and supporting the Ex-EDC (E&SE) Lakki Marwat in making illegal appointment"

His written reply was received on 17-1-2013 (Annex-H). He claimed that appointment orders of TT (Male), Qari (Male), DM (Male), PST (Male), Lab Assistant and Driver were issued by the Ex- EDO. He neither took part in the meeting of DSC nor signed merit lists. He signed merit lists of CT (Male), CT (Female) and PST (Female) prepared by dealing Assistant. It is possible that some candidates have submitted fake documents with their application. Before issuance of appointment orders verification of documents was required. He requested the EX-EDO for verification of documents before issuing appointment orders which was not honoured. On the direction of Ex-EDO tests & interviews were conducted by the Principal/Headmaster of the school concerned and ministerial staff. He was not member of test/interview committees. He only matched the final merit list with interview list. No discrepancy was noticed. At the time of interview original documents were checked by the interviewing committee. At the time of signing final merit list original documents were not available. Only interview list was provided. He never intentionally signed illegal quota in violation of merit.

Mr. Noorani Shah, Dy Distt Officer (M/F)

Mr. Noorani Shah, worked as Deputy District Officer (M/F) with effect from 2.11.2009 to 11.10.2011. He was charged as under:-

"Drawing and Disbursing Officer of PST (Male) committed gross negligence and made irregular payment causing huge loss to the public exchequer"

Mr. Noorani Shah the then DDO Lakki Marwat now Headmaster, Government High School Baist Khel, Lakki Marwat in his reply claimed that it is sole responsibility of Selection Committee to appoint suitable candidates against available vacancies (Annex-I). The composition of the District Selection Committee notified by the E&AD vide Notification No.SOR-V(E&AD)2-7/2003 dated 1-11-2006 is as under (Annex-J):

- a) EDO Education (E&SE) Chairman
- b) Nominee of DCO Member
- c) One nominee of Administrative Deptt: Member
- d) District Officer concerned Member

Mr. Noor Hassan Khan, Ex-EDO constituted District Selection Committee of his choice composition of which is as under:-

S.No	Name	Designation	
1	Mr. Noor Hassan Khan	Ex EDO, Lakki Marwat	Chairman
2	Mr. Muhammad Ayub Khan,	District Officer(M) Lakki Marwat	Member
3	Mr. Shafiullah, PS to DCO	Representative of DCO	Member
4	Mr. Amanullah, Mr. Bahadar Zaman Mr Haroon Badshah (For respective cadets)	Head Clerk, EDO, Lakki Marwat. Senior Clerk, EDO, Lakki Marwat. Junior Clerk, EDO, Lakki Marwat shown as Assistant	Member

Since he was not member of the selection committee therefore he was never consulted in the selection process. Appointees were directed to report the concerned headmaster of the school after having medical examination. After completion of these documents by the concerned school, cases were forwarded to DDO. The DDO scrutinized documents for release of salaries. This procedure is in practice since long. Accordingly I forwarded names of appointees for payment of salaries after fulfilling all legal requirements. On 28.2.2011 Mr. Abdul Malik took over the charge of EDO. He decided that salaries may be

(86)

His order was implemented with letter and spirit.

Mr. Amanullah, Head Clerk, EDO, Lakki Marwat

Mr. Amanullah is working as Head Clerk (BPS-14) in the office of the DDO (M) E&SE Lakki Marwat with effect from 23-5-2004 till date. He was charged as follow:-

"Committed gross negligence, supporting and assisting the Ex-EDO in making illegal appointment in violation of merit, Government policy and procedures in the office of EDO (E&SE) Lakki Marwat"

His written reply was received on 15-01-2013 by post (Annex-K). In his reply he claimed that he has no concern with appointment orders during the tenure of Mr. Noor Hassan Khan therefore he committed no irregularity or illegality. He never assisted or supported the EDO in illegal appointments, in violation of merit, Government Policy and procedure in practice. Files dealt with were of routine manners & being no authority, He has no concern with appointments, under the quoted laws; being defective. He is neither guilty nor liable to any penalty specified in the rules. He has signed CT (Female) DSC minutes dated 24-2-2011 which negates his statement.

5 Mr. Bahadar Zaman, Senior Clerk, EDO, Lakki Marwat,

Mr. Bahadar Zaman, worked as Junior Clerk at Govt High School Tajori District Lakki Marwat with effect from 30-4-1995 to 15-2-2010. On his promotion as Senior Clerk he was transferred to EDO office, Lakki Marwat on 16-2-2010. He has been charged as follows:-

"Committed gross negligence, supporting and assisting the Ex-EDO in making illegal appointment in violation of merit, Government policy and procedures in the office of EDO (E&SE) Lakki Marwat"

His written reply was received on 16-01-2013 by post which is within given time. In his reply he claimed that he has no concern with appointment orders during the tenure of Mr. Noor Hassan Khan therefore he committed no irregularity or illegality (Annex-L). He never assisted or supported the EDO in illegal appointments, in violation of merit, Government Policy and procedure in practice. Files dealt with were in routine manners & being no authority, he has no concern with appointments. Under the quote I laws, being defective he is neither guilty nor liable to any penalty specified in the rules. Checking of record revealed that he has signed CT (Female) DSC minutes dated 24-2-2011.

6 Mr. Haroon Badshah, Junior Clerk, EDO, Lakki Marwat,

Mr. Haroon Badshah is working as Junior Clerk, in the office of Deputy District Officer (Female) Lakk Marwat with effect from 22-4-2006 till date. Following charges were leveled against him:-

"Committed gross negligence, supporting and assisting the Ex-EDO in making

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illegal appointment in violation of merit, Government policy and procedures in the office of EDO (E&SE) Lakki Marwat"

His written reply was received on 15-01-2013 by post which is within given time. In his reply he claimed that he has no concern with appointment orders during the tenure of Mr. Noor Hassan Khan therefore he committed no irregularity or illegality (Annex-III). He never assisted or supported the EDO in illegal appointments, in violation of merit, Government Policy and procedure in practice. Files dealt with were in routine manners & being no authority, he has no concern with appointments. Under the quoted laws, being defective he is neither guilty nor liable to any penalty specified in the rules.

He admitted that he distributed and collected application forms. Due to death of his father on 27-1-2011 he handed over data as well as other documents to Ex-EDO. He has also signed PST (Female) DSC minutes dated 24-2-2011.

OBSERVATIONS

The composition of the District Selection Committee notified by the Provincial Government is as under:

- | | |
|---|----------|
| a) EDO Education (E&SE) | Chairman |
| b) Nominee of DCO | Member |
| c) One nominee of Administrative Deptt: | Member |
| d) District Officer concerned | Member |

District Selection Committee notified by Mr. Noor Hassan Khan, Ex-EDO is as under:-

S.No	Name	Designation	
1	Mr. Noor Hassan Khan	Ex EDO, Lakki Marwat	Chairman
2	Mr. Muhammad Ayub Khan,	District Officer(M) Lakki-Marwat	Member
3	Mr. Shafiullah, PS to DCO	Representative of DCO	Member
4	Mr. Amanullah,	Head Clerk, EDO, Lakki Marwat	Member
	Mr. Bahadar Zaman	Senior Clerk, EDO, Lakki Marwat,	
	Mr Haroon Badshah (For respective cadres)	Junior Clerk, EDO, Lakki Marwat shown as Assistant	

Since composition of the DSC is not in accordance with notification of the Provincial Government therefore it by itself is irregular. Ex-EDO E&SE Lakki Marwat intentionally avoided to associate representative of the Administrative Department.

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PST (Male):-

Mr Noor Hassan Khan, Ex-EDO invited applications for various posts through daily Aaj dated 11-5-2010. A number of applications were received for the post of PST (Male). A number of PST (M) were appointed without preparation of merit lists and convening meeting of DSC. Test and interview were conducted however due to stay granted by the PHC Bench D.I.Khan vide letter No. 3022/Jud/AR dated 23-9-2010 further action was kept pending. DO (Male) in his statement confirmed the same. Mr. Noor Hassan Khan, Ex-EDO issued fifty one (51) appointment orders as per details given below. Copies of appointment orders are attached (Annexure-N).

STATEMENT SHOWING THE DETAILS OF APPOINTMENTS PST (MALE)

SNo.	NAME	FATHER'S NAME	ORDER NO.	DATE	CATEGORY / QUOTA	REMARKS
1	Rustam Khan	Qasim Khan	201-5	08-02-2011	1999 AIOU	
2	Said Nawaz	Mir Ali Khan	10937-41	04-10-2011	Class-IV Quota	No such quota exists at the moment.
3	Qayyum Khan	Pir Ghulam Khan	11714-19	25-10-2010	Class-IV Quota	No such quota exists at the moment.
4	Muhammad Anwar	Hayatullah	8344-49	22-01-2011	Class-IV Quota	No such quota exists at the moment.
5	Niamatullah	Sheikh Rasool	10001-6	8-09-2010	Court Case	Court orders not produced. Appointed as 1999 denied candidate
6	Azhar Shah	Mehmood Shah	11772-77	25-10-2010	Court Case	Court orders not produced. Appointed as 1999 denied candidate
7	Sayed Wali	Sarfraz Khan	11795-801	26-10-2010	Court Case	Court orders not produced. Appointed as 1999 denied candidate
8	Saif ur Rahman	Abdul Raheem Khan	1203-40	01-11-2010	Court Case	Court orders not produced
9	Hidayatullah	Zafar Khan	11391-96	05-11-2010	Court Case	Court orders not produced
10	Amanullah	Mir Qadar Khan	11917-22	25-11-2010	Court Case	Court orders not produced
11	Damsaz Khan	Saday Khan	1690-95	01-01-2011	Court Case	Court orders not produced. Appointed as 1999 denied candidate
12	Rahim Shah	Zarban Shah	1400-07	01-01-2011	Court Case	Court orders not produced
13	Sher Daraz	Gul Nawaz	67-70	17-01-2011	Court Case	Court orders not produced
14	Hidayatullah	Maman Baksh	8355-62	24-01-2011	Court Case	Court orders not produced
15	Raham Dil Khan	Mani Khan	135-38	01-02-2011	Court Case	Court orders not produced

NAME	FATHER'S NAME	ORDER NO.	DATE	CATEGORY / QUOTA	REMARKS
	Syed Sadshah	1315-20	09-02-2011	Court Case	Court orders not produced
	Muhammad Yousaf	1391-97	10-02-2011	Court Case	Court orders not produced
Manawar Khan	Ayoub Khan	1615-1620	19-02-2011	Court Case	Court orders not produced. Appointed as 1999 denied candidate
Najeeb Ullah	Gul Rehman	1878-80	22-02-2011	Court Case	Court orders not produced
Abdul Wahab	Arzoman Khan	278-81	22-02-2011	Court Case	Court orders not produced
Gul Mar Jan	Wazir Khan	298-302	22-02-2011	Court Case	Court orders not produced
Islam Badshah	Abdul Habib	2108-12	25-02-2011	Court Case	Court orders not produced
Abd Hussain	Neer Qalam Khan	2108-12	25-02-2011	Court Case	Court orders not produced
Moin Khan	Mir Abbas	2108-12	25-02-2011	Court Case.	Court orders not produced. Appointed as 1999 denied candidate
Nematullah Khan	Amir Nawaz Khan	1441-46	16-2-2010	Court Case.	Court orders not produced. Appointed as 1999 denied candidate
Samiullah	Ayub Khan	1427-33	16-2-2010	Court Case.	Court orders not produced. Appointed as 1999 denied candidate
Shah Wali Khan	Hameedullah Khan	2340-46	11-3-2010	Court Case.	Court orders not produced. Appointed as 1999 denied candidate
Memin Khan	Mahboob Khan	4672-78	23-4-2010	Court Case.	Court orders not produced
Inamullah Khan	Muhammad Khan	12516-21	21-12-2010	Deceased Son	
Farhatullah	Akbar Jan	1288-92	22-12-2010	Deceased Son	Documents be produced
Abdul Hamid	Rahim Jan	725-30	18-01-2011	Deceased Son	Documents be produced
Aliqullah Khan	Taj ali Khan	1647-52	21-02-2011	Deceased Son	Documents be produced
Shafiqat Ullah	Inayatullah Khan (Late)	1840-44	22-02-2011	Deceased Son	Documents be produced
Ihsanullah	Abdul Ghani	1860-65	22-02-2011	Deceased Son	Documents be produced
Mashtal Khan	Abdul Jalil	1434-40	16-2-2010	Disable	No of disable persons & total number of employees not known.
Amjadullah Khan	Abdul Sattar Khan	9285-91	29-07-2010	Disable	No of disable persons & total number of employees not known.

No.	NAME	FATHER'S NAME	ORDER NO.	DATE	CATEGORY / QUOTA	REMARKS
	Kaleem Ullah	Muhammad Aslam Khan	1684-89	30-12-2010	Disable	No of disable persons & total number of employees not known.
38	Nasir Mahmood	Muhammad Subhan	1680-95	30-12-2010	Disable	No of disable persons & total number of employees not known.
39	Munawar Khan	Abdul Sattar	144-47	01-02-2011	Disable	No of disable persons & total number of employees not known.
40	Javed Iqbal	Akbar Khan	303-09	23-02-2011	Disable	No of disable persons & total number of employees not known.
41	Faridullah	Abdul Manan	95-98	21-01-2011	Ex-Service Man Son Quota	No such quota exists at the moment.
42	Zafar Ullah Shah	Saifullah Khan	3651-56	27-3-2010	Merit	No meeting of DSC held
43	Farmanullah	Hayatullah Jan	4185-87	09-4-2010	Merit	No meeting of DSC held
44	Abdul Qadir Khan	Habibullah Khan	11802-05	26-10-2010	Merit	No meeting of DSC held
45	Niamatullah Khan	Inayatullah Khan	29-32	01-01-2011	Merit	No meeting of DSC held
46	Khalid Usmani	Amir Nawaz	1106-11	29-01-2011	Merit	No meeting of DSC held
47	Bashir Ullah	Muzaffar Khan	224-27	10-02-2011	Merit	No meeting of DSC held
48	Fahimullah	Mashai Khan	2001-05	24-02-2011	Merit	No meeting of DSC held
49	Asim Jan	Hakam Jan	1821-26	5-11-2010	Rtd. Employee Son Quota	No such quota exists at the moment
50	Wahid Ullah	Saifullah	11778-84	25-10-2010	Shaheed Brother's Quota	No such quota exists at the moment
51	Iftikhar Ahmad Khan	Sher Ali Khan	201-5	08-02-2011	Teacher Son	No such quota exists at the moment

WP No. 451 with CM 441 of 2010, WP 222/2008 & WP No22 of 2010 PHC DI Khan Berak remanded cases to EDO to decide the same 15 days & 60 days respectively. (Annex-D). No specific orders with regard to the appointment of petitioners were passed. The Ex-EDO misinterpreted the judgments of the courts in his own way. It is astonishing to note that only seven persons were appointed on merit. Three candidates were appointed against class-IV quota which does not exist. Twenty four appointment orders were issued under the shelter of court cases. One candidate was appointed as PST being 1999 qualified from Allama Iqbal Open University. Six candidates were appointed against deceased son quota. Similarly six were appointed against disable quota. Actual number of posts falling to

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The share of disable has not been indicated. Mr. Farid ullah s/o Abdul Manan was appointed being ex-serviceman. No such quota exists at the moment. One person was employed being teacher's son. One person was appointed being brother of Shaheed and one person being son of retired employee. Ex-EDO failed to produce merit list and minutes of the DSC. Thus all the appointments can be termed as irregular. Ex-EDO Lakki Marwat, issued appointment orders in piecemeal just to conceal his illegal acts. Details of piecemeal appointments are as under:

SNo.	Number of persons appointed	Date of appointment	Dispatch Number
1.	One	29-07-2010	9285-91
2.	One	8-09-2010	10001-06
3.	Three	25-10-2010	11772-77, 11778-84, 11714-19
4.	One	26-10-2010	11795-801
5.	One	1-11-2010	12035-40
6.	Two	5-11-2010	1821-26, 11391
7.	One	25-11-2010	11917-22
8.	One	21-12-2010	12516-24
9.	One	22-12-2010	1288-92
10.	Two	30-12-2010	1684-89, 1630-55
11.	One	1-1-2011	1690-95
12.	One	17-1-2011	67-70
13.	One	18-1-2011	725-30
14.	One	21-1-2011	95-98
15.	One	22-1-2011	8344-49
16.	One	24-1-2011	8355-62
17.	One	29-1-2011	1108-11
18.	One	1-2-2011	144-47
19.	One	9-2-2011	1315-20
20.	One	10-2-2011	1391-97
21.	One	19-2-2011	1615-20
22.	One	21-2-2011	1647-52
23.	Four	22-2-2011	1840-44, 1860-35, 1878-30, 278-31
24.	Two	23-2-2011	298-302, 303-06
25.	One	24-2-2011	2001-05
26.	One	08-2-2011	201-5
27.	One	4-10-2010	10937-41
28.	One	1-2-2011	135-38

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29.	Three	25-2-2011	2108-12
30.	One	16-2-2010	1441-46
31.	One	16-2-2010	1427-33
32.	One	11-3-2010	2340-46
33.	One	23-4-2010	4672-78
34.	One	16-2-2010	1434-40
35.	One	1-2-2011	144-47
36.	One	27-3-2010	3651-56
37.	One	9-4-2010	4185-87
38.	One	1-1-2011	29-32
39.	One	8-2-2011	201-5
40.	One	1-1-2011	1400-07
41.	One	26-10-2010	11802-05
42.	One	10-2-2011	224-27
43.	Fifty one (51)		

Six (6) persons were appointed against deceased son quota on 21-12-2010, 18-01-2011, 21-2-2011, 22-2-2011, 5-2-2011 & 22-12-2010 which are justified. Neither meeting of DSC was convened nor was final merit list prepared. Two (2) appointment orders of Mr. Gul Marjan s/o Wazir Khan, GPS Guli Khel Battani and appointment of Ismat kausar D/o Shah Muhammad, Masha Mansoor, GGPS Azim Kilia (Masha Mansoor) have been allotted same dispatch number i.e 298-302 dated 23-2-2011 (Annex-P). Similarly appointment orders of Mr. Damsaz Khan s/o Saday Khan, GPS Kotka Gul, Karar, Sra Darga and appointment of Nasir Mehmood S/o Muhammad Subhan, GPS Purana Mari wala have allotted same dispatch number i.e 1690-95 dated 30-12-2010 (Annex-C). Thus all the appointments are irregular. Mr. Noor Hassan Khan, Ex-EDO is personally responsible for the same. Members of the DSC can't be held accountable for this irregularity.

PST(Female):-

About 1134 applications were received for the post of PST(F). According to DDO (Female) only nineteen (19) vacancies were available. Ex-EDO issued seventy nine (79) appointment orders. Thirty nine appointment orders were issued vide notification No 2074-79/PST(F) dated 25-2-2011 duly approved by the DSC (Annex-R). Remaining forty (40) orders have been issued on 16-2-2010, 5-11-2010, 4-1-2011, 13-1-2011, 10-2-2011, 24-1-2011, 23-2-2011, and 25-2-2011 that too without obtaining approval of DSC. Appointment order of two persons against deceased son quota seems justified. Remaining appointment orders are irregular. Three appointment orders were issued prior to advertisement dated 11-5-2011. Miss Bibi Zainab d/o Munawar Khan was appointed at GGPS Langer, Khel as PST against deceased son quota. Reportedly her father is alive.

No.	Name of Candidate	Father's Name	Name of School	Date of Issue Order	Pay Status	Service Status	Name of Court	Remarks
1	Aama Bibi	Sahab Gul	GGPS Saifullah Mash Mastikhani	18-10-10	Stopped	Terminated	Reasons	Fake appointment order
2	Zara Tari	Zari Jan	GGPS Saifullah Mash Mastikhani	18-10-10	Stopped	Terminated	Reasons	Fake appointment order
3	Bibi Saadga	Harbat Khan	GGPS Kotka Zarwali Khan (Naumang)	28-01-11	Stopped	Terminated	Reasons	Fake appointment order
4	Rukia Bibi	Wali Jan	GGPS Wanda Mashmasti Khani	22-02-11	Stopped	Terminated	Reasons	Fake appointment order
5	Shahida Bibi	Najibullah	GGPS Mir Azam Michin Khel	22-02-11	Stopped	Terminated	Reasons	Fake appointment order
6	Shamshad Bibi	Rahim Yar Khan	GGPS Ghazi Michin Khel	22-02-11	Stopped	Terminated	Reasons	Fake appointment order
7	<u>RUKHSANA HAYAT</u>	Hayatullah	GGPS Textile Mills Sera-e-Naurang	25-02-11	Stopped	Terminated	DSC Approval	Duly approved by DSC. PTC Marks 563. Not 053 as recorded in the merit list. Service terminated due to fake documents.
8	<u>NUSRAT SHAHEEN</u>	Awaj Khan	GGPS Sheri-Khel Faqiran	25-02-11	Stopped	Terminated	DSC Approval	Duly approved by DSC. Passed FA 2009. Marks for experience not correct. Service terminated due to fake documents.
9	<u>JAMSHID BIBI</u>	Ghulam Nabi	GGPS Hamid Abad Lakki	25-02-11	Stopped	Terminated	DSC Approval	Duly approved by DSC. SSC found Fake. Service terminated due to fake documents.
10	<u>FEHMIDA BIBI</u>	Amin Khan	GGPS Toll Abad Lakki	25-02-11	Stopped	Terminated	DSC Approval	Duly approved by DSC. Service terminated due to fake documents.
11	<u>NAUREEN NAZI</u>	Abdul Ghaflar	GGPS Wanda Khara	25-02-11	Stopped	Terminated	DSC Approval	Duly approved by DSC. Service terminated due to fake documents.
12	<u>SHAMIM BEGUM</u>	Ahmad Jan	GGPS Khushal Adamzal	25-02-11	Released	Terminated	DSC Approval	Duly approved by DSC. Passed FA in July 2010. Not eligible. Service terminated due to fake documents.
13	<u>RIFAT RANI</u>	Feroz Khan	GGPS Jhang Khel No. 2	25-02-11	Stopped	Terminated	DSC Approval	Duly approved by DSC. Only two vacancies in the U.C. She is at S. No. 28 in U.C. merit list. On the orders of the PHC her appointment was terminated and Miss Sonia Aman was appointed.
14	Ruqia Bibi	Muhammad Khan	GGPS Kechi Qamar	25-02-11	Stopped	Terminated		
15	Abba Meena	Moeenullah	GGPS Khan Khel Mastaran	21-12-10	Pay Stop		Regular Case pending in Service Tribunal K.P	
16	Aishan Bibi	Azim Khan	GGPS Wanda Faqiran (Sheri Khel)	21-02-11	Pay Stop		Regular Case pending in Service Tribunal K.P	
17	Ismat Kausar	Shah Muhammad	GGPS Azim Kala Mashmansoor	23-07-11	Pay Stop		Regular Case pending in Service Tribunal K.P	
18	<u>M. FARHIDA BIBI</u>	Sahab Jan	GGPS Ghazi Khel	25-02-11	Pay Stop		Regular Case pending in Service Tribunal K.P	DSC Approval Duly approved by the DSC. She is at S# 45 of U.C merit list. No Court Order available.

						Regular Case pending in Service Tribunal K.P.	DSC Approval	Duty approved by the DSC.
19	<u>SHAZIA NAURIN</u>	Muhammad Afzal	GGPS Rehamd/W Oureshi Adamzai	25-02-11	Stopped			
20	Faibada Matin	Rais Khan	GGPS Hafiz Mala Khel	24-10-10	Released			According to existing service rules no quota is reserved for ex servicemen at the moment.
21	Rehmana Bibi	Sahab Khan	GGPS Hafiz Mala Khel	24-10-10	Released			
22	Kulsoom Bibi	Habibullah	GGPS No. 3 Mala Mandra Khel	11-05-10	Released			No Court Order available.
23	Ikhlat Rehana		GGPS Hafiz Mala Khel	01-03-11	Released		Reverted CT to PST	
24	Bibi Zahab	Munawar Khan	GGPS Langer Khel Hindal	01-04-11	Released			Her Father still alive. Her Husband was a Sailor in Pak Navy. Provl. Govt. is not supposed to provide her job.
25	Miss Musarat Bibi	Nasrullah Khan	GGPS Sharbi Khel	13-01-11	Released			Does not appears in the final merit list. No vacancy is available in the U.C.
26	Famat Bibi	Tahir Shah	GGPS Sargrah Muhammad Kran	24-01-11	Released			
27	Madaha Asmat	Asmatullah	GGPS Akhtojan Baitani	02-10-11	Released			Appointed against Deceased Son quota. Unattested. DSC approval not available.
28	Zainab Nooreen	Sanauddin	GGPS Akhtojan Baitani	22-02-11	Released			
29	Sabra Bibi	Ali Jan	GGPS Kotka Zarwali Khan (Naurang)	22-02-11	Released			
30	Farida Begum	Mirzali Khan	GGPS Zarjano	24-02-11	Released			
31	<u>SHEHLA MEHMOOD</u>	Mehmood Hashim	GGPS Khushdil Adamzai	25-02-11	Released		DSC Approval	Duty approved by the DSC. She was a regular student Govt. College Lakk. Experience marks not allowed.
32	<u>NAJMA NOOREEN</u>	Muhammadullah	GGPS Wanda Khan Doran	25-02-11	Released		DSC Approval	Duty approved by the DSC. She did BSc from Bannu Univ; hence not eligible for exp. marks.
33	<u>HUSAN PARI</u>	Nowaz Khan	GGPS Azal Mir Baitani	25-02-11	Released		DSC Approval	Duty approved by the DSC.
34	<u>HAMIDA GUL</u>	Dilawar Khan	GGPS Ghandi Qamar Zaman	25-02-11	Released		DSC Approval	Duty approved by the DSC.
35	<u>KANWAL UROOJ</u>	Muhammad Ramzan	GGPS Wanda Khan Doran	25-02-11	Released		DSC Approval	Duty approved by the DSC. She passed PTC in 2009. Not eligible for teaching experience.
36	<u>QAMAR TALAT</u>	Hamiullah	GGPS Amina Jabo Khel	25-02-11	Released		DSC Approval	Duty approved by the DSC. She passed PTC in Sept 2010. Thus Ineligible.
37	<u>ZUBAIDA</u>	Gulnawaz Khan	GGPS Harama Tzla Wakil	25-02-11	Released		DSC Approval	Duty approved by the DSC. No vacancy in U/C.
38	<u>FAHMEDA</u>	Inayatullah Khan	GGPS Zarjano	25-02-11	Released		DSC Approval	Duty approved by the DSC. She was a regular student of Govt. College Lakk. Not entitled for experience marks.
39	<u>GULSHAN BIBI</u>	Jan Gul	GGPS Khan Khel Mandazai	25-02-11	Released		DSC Approval	Duty approved by the DSC. No vacancy available in U/C. Experience marks irregular.

						DSC Approval	Duty approved by the DSC. Dis/le
40	<u>SHAKIDA</u>	Ali Khan	GGPS Harama Tala Wajal	25-02-11	Released		
41	<u>Shahida Bait</u>	Mr. Saqar	GGPS Gulbot Dehqan	25-02-11	Released		No vacancy in U/C. She is at S33. No approval of DSC. She passed PTC in 2009. Not entitled for experience marks.
42	<u>Shahida Aro</u>	Mr. Ayub Khan	GGPS Wada Kuttana	25-02-11	Released		No vacancy in U/C. DSC approval not available.
43	<u>Farda Yasmin</u>	Abdul Mansa	GGPS Dulatmir Lawang Khel	25-02-11	Released		No vacancy in U/C. Poor merit.
44	<u>Nadia Koreen</u>	Rehmatullah	GGPS Tarkha Badi Khel No. 2	25-02-11	Released		No vacancy in U/C.
45	<u>Raza Noomen</u>	Majid Rasool	GGPS Landwa Mazulah	25-02-11	Released		
46	<u>Iram Naveed</u>	Nobal Khan	GGPS Muhammad Nawaz Tajazai	25-02-11	Released		No post available in U/C. Experience marks wrongly awarded.
47	<u>Gu. Rabbani</u>	Azed Khan	GGPS Akhtojan Baitani	25-02-11	Released		No post available in U/C. Experience marks wrongly awarded.
48	<u>Tania Aman</u>	Amanullah	GGPS Jhang Khel No. 2	03-03-12	Released	In place of Rifaq Rani	
49	<u>Asma Dilawar</u>	Dilawar Khan	GGPS No. 3 Mela Mandra Khel	05-11-12	Released		
50	<u>Mentab Gul</u>	Momin Khan	GGPS Gul Akhtar Ghazni Khel		Released		
51	<u>Asia Bano</u>	Yousaf Khan	GGPS M. Ayaz Bahmal Ahmadzai	23-02-11	Stopped		
52	<u>HASINA LATIF</u>	Latifullah	GGPS Hafiz Mala Khel	25-02-11	Stopped	DSC Approval	Duty approved by the DSC. Regular Student of Jinnal College Peshawar. Not eligible for experience marks.
53	<u>SHAKILA CAYIMA</u>	Abdul Cayum	GGPS Mash Habzullah	25-02-11	Stopped	DSC Approval	Duty approved by the DSC.
54	<u>ROMANA GUL</u>	Saifur Rehman Shah	GGPS Oeemat Manjwala	25-02-11	Stopped	DSC Approval	Duty approved by the DSC. She passed BSc. from Univ. of Bannu. Not entitled for experience marks.
55	<u>SOBIA GUL</u>	Gul Badshah	GGPS Shamoni Khattak Maazullah	25-02-11	Stopped	DSC Approval	Duty approved by the DSC.
56	<u>ROBINA SHAHEEN</u>	Falak Noz	GGPS Langer Khel Hindal	25-02-11	Stopped	DSC Approval	Duty approved by the DSC.
57	<u>SUMIA RAHIM QURESHI</u>	Abdul Baheem	GGPS Sarga Khero Khel	25-02-11	Stopped	DSC Approval	Duty approved by the DSC.
58	<u>SHEHLA SHAHEEN</u>	Muzaff Khan	GGPS Wanda Kalan	25-02-11	Stopped	DSC Approval	Duty approved by the DSC.
59	<u>FARHAT NISA</u>	Watan Khan	GGPS Wanda Lughman	25-02-11	Stopped	DSC Approval	Duty approved by the DSC. She passed PTC in 30-3-2010. Regular student Govt. College. Not entitled for experience marks.
60	<u>NIGHAT SULTANA</u>	Muhammad Bashir	GGPS Shakh Quli Khan No. 2	25-02-11	Stopped	DSC Approval	Duty approved by the DSC. She passed PTC in 2009. Not entitled for experience marks.
61	<u>MUSARAT SHAHEEN</u>	Muhammad Nazir Khan	GGPS Sherjan Abad	25-02-11	Stopped	DSC Approval	Duty approved by the DSC.

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62	ZAHREEN DEGUJI	Nasib Ali Shah	GGPS Kotka Madat	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. Regular student of Bannu Univ. in 2007.
63	FARIDA BIBI	Muhammad Ghulam	GGPS Jhang Khel No. 2	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. PTC documents not available.
64	HAJRA MUSARAT	Muhammad Ibrahim	GGPS Baland Khel	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. She was a regular student of B.Sc. Not entitled for experience marks.
65	NADIA PERVEEN	Ataf Khan	GGPS Nar Gul Hassan Shah	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. No vacancy in U/C. Regular student of Bannu Univ. Not entitled for experience marks.
66	ROMANA SOHRAD	Sohrab Khan	GGPS Kotka Zarwa Khan (Naurang)	25-02-11	Stopped		DSC Approval	Duty approved by the DSC.
67	SADIA KHAN	Katu Khan (Ghazni Khel)	GGPS Bai Khan	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. No vacancy available in U/C.
68	HAJMA IRAM	Amanullah Khan	GGPS Kawal Khel	25-02-11	Stopped	Case pending in Service Tribunal K.P	DSC Approval	Duty approved by the DSC.
69	SAKINA GUL	Shah Alam Khan	GGPS Tapi Murad	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. No vacancy available in U/C.
70	SHAGUFTA BIBI	Yunas Khan	GGPS Wanda Banochi	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. No quota is reserved for ex-matriculates at the moment.
71	ZAITOON BIBI	Umer Khan	GGPS Wanda Aurangzeb	25-02-11	Stopped		DSC Approval	Duty approved by the DSC. Overage. No vacancy in U/C. Merit position 72. If candidates within age limit are available then relaxation cannot be accorded.
72	Abida Perveen	Abdul Aziz	GGPS Langer Khel Hindal	25-02-11	Stopped		Appoint. Order not Available	
73	Ruhana Bibi	Syed Ahmad	GGPS Aghza Ouzha	25-02-11	Stopped			Passed FA on 21.7.2010.
74	Naila Hassan	Noor Hassan	GGPS Tari Khel No. 2	25-02-11	Stopped			D/O of Noor Hassan Ex-EDO Laki Marwar.
75	Aamera Bibi	Gul Muhammad	GGPS Sargarha Mehmud Khan	25-02-11	Stopped			
76	Safina DSI	Muhammad Shafi	GGPS Ghulam Ali Simli	25-02-11	Stopped			Only three seats in the U.C. Merit position is 72.
77	Fatma Bibi	Babrai Khan Renar	GGPS Mirsha Balian	25-02-11	Stopped			S.No.7 in U/C. Not approved by DSC. Only matriculate.
78	Mehnaz Bibi	Amanullah Khan	GGPS Wanda Ansala	25-02-11	Stopped			No vacancy in U/C. Not approved by DSC. S.No.2
79	Bahar Noma	Farooz Khan	GGPS Kotka Muhammad Nawaz	10-02-11	Stopped		Appoint. Order not Available	

Applications for the post of PST (F) were invited through daily Aaj Peshawar dated 16-10-2008. Last date for submission of application was 31-10-2008. According to office order No 10449-53 dated 31-8-2009 Miss Rabia Kalsoom D/O Muhammad Saadiq has been appointed as PST (Female). At the time submitting application she was matriculate. She passed Primary Teaching Certificate from Allama Iqbal Open University on 14-3-2009. Similarly she passed F.A. examination from BISE Bannu on 26-7-2009. She was not eligible for the post of PTC. It is astonishing to know how she was awarded marks and selected against open merit quota. Dispatch No 10449-53 dated 31-8-2009 tally with dispatch register. It may be pointed out that after passing FA/FSc a candidate becomes eligible to appear in the PTC course. In the instant case she claims to pass PTC examination first in then appeared in FA. His

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appointed is irregular. His husband is working as KPO in EDO office who used unfair means for appointment as PST(Annex-S).

When documents were got verified by the sitting EDO which revealed that following six female PST appointed vide office order No 2074-79/PST(F) dated 25-2-11 presented fake documents.

S.No	Name	Father's name	Place of appointment
1	Shamim Begum	Ahmad Jan	GGPS Khushdil Adamzai
2	Jamshed Bibi	Ghulam Nabi	GGPS, Hameed Abad, lakki
3	Rukhsana Hayat	Hayatullah	GGPS Textile Mills
4	Fahmida Bibi	Amin Khan	GGPS Tooti Abad
5	Nusrat Shaheen	Awal Khan	GGPS Sheri Khel Faqiran
6	Naureen Niazi	Abdul Ghafoor Niazi	GGPS Wanda Khara

Their services have been terminated vide office order No.5800-806 dated 27-07-2012 but no criminal proceedings have been initiated against them (Annex-T). Cases should be registered with Anti Corruption Establishment for producing fake certificates and forgery otherwise this practice will continue in future. He appointed Miss Bibi Zainab d/o Munawar Khan at GGPS Langer Khel as PST against deceased son quota vide office order No. 1611-17 Dated 4-1-2011(Annex-U). Reportedly her father is alive.

CT(Male)

After inviting applications through advertisement dated 11-5-2010 recruitment process was completed. Minutes were approved by the DSC (Annexure-V). Appointment orders of nine CT (Male) were issued through a consolidated notification No. 2119-24/CT(M) dated 25-2-2011 (Annex-W). Mr. Ihsanullah s/o Watan Khan, Dallo Khel, Mr. Munir Khan s/o Atlas Khan Lakki Michan Khel, Fakhrul Islam s/o Muhib Ullah Mr. Abdur Rehman s/o Abdul Qayyum and Mr. Atiq ur Rehman s/o Abdul Qayyum were appointed as CT Teacher against retired son quota which does not exist at the moment. Four candidates were appointed on 31-5-2010, 4-11-2010, 23-11-2010 without observing codal formalities. Three appointment orders were issued without preparation of merit list and approval of DSC. Mr. Gohar Rehman s/o Muhammad Ayub, District Officer was appointed CT teacher vide office order no. 11874-78 dated 30-11-2010 against quota reserved for Disable person special meeting of the DSC was held on 20-11-2010 for his appointment. All the appointments are illegal.

OPEN MERIT

S.No	Name	Father name & address	Posted at	Remarks
1.	Laiq Shah	Nabi Shah R/O Gandhi	GHS No.1	Against a Vacant post

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		Khan Khel	Jajori	
2.	Naqibullah Khan ✓	Muhammad Zaman R/O Umer Abad	GHS No.1 Tajori	Against a Vacant post. Teaching experience in private institution not countable. Experience marks wrongly awarded.
3.	Muhammad Iqbal ✓	Zar Gul Khan		No codal formalities i.e advertisement, test, interview, preparation of merit list & approval of DSC have been observed.

SESSION WISE MERIT (OPEN MERIT)

Remarks

S.No.	Name	Father name & address	Posted at	Remarks
1.	Dilawar Khan ✓	Mehr Jan R/O Langer Khel Hindal	GMS Satar Bhattani	Against a Vacant Post.
2.	Abdul Khan Majid ✓	Abdul Karim R/O Wanda Lughman Baist Khel	GHS Khan Khel Mandozai	Against a Vacant Post..
3.	Hidayatullah	Saadullah R/O Umer Titter Khel	GHS No.1 Taori	Against a Vacant Post.
4.	Abdul Wahab	Muhammad Yousaf Mina Khel	GHS Wanda Aurangzeb	Against a Vacant Post.
5.	Sifatullah ✓	Asmat Ullah R/O Asmat Abad	GHSS Landiwah	Against a Vacant Post.
6.	Wahid Ullah	Hameed ullah Jan	GHS Daraka, Aziz Khan	He is at S.No. 126 in the session wise merit list

RETIRED GOVT SON

S.No.	Name	Father name & address	Posted at	Remarks
1. ✓	Ihsanullah	Watan Khan R/O Dallo Khel	GHS No.2 Tajori	Retired son quota. does not exist at the moment.
2. ✓	Munir Khan	Atlas Khan R/O Lakki Michan	GHS Abdul Khel	Ex-Service men Quota. Does not

3.	Abdur Rehman	Khel - Abdul Qayyum		exist at the moment He applied for the post of CT on 7-10-2010 i.e. 4.5 months later after the last date
4.	Fakhrul Islam	Mohibullah Khan		Retired son quota: does not exist at the moment
5.	Mr. Ateeq ur Rehman	Abdul Qayyum	GHS Wanda Baru	He was appointed against retired employees son quota which does not exist. Approval of DSC not obtained

COURT CASE

S.No.	Name	Father name & address	Posted at	Remarks
1.	Muhammad Jamil	Abdullah Jan		Record not available
2.	Fakhar Zaib	Abdul Aziz		No court decision and other records are available in the office.
3.	Inamullah	Nasir Jan		Record is not available in the office. He is working against CT post at GHS Jang Khel & drawing his monthly salary under personal No.499376. The H/M concerned failed to provide his record in spite of proper correspondence of the EDO vide his letter No.7592-97 dated 10.05.2011.
4.	Gohar Rehman	Muhammad Ayub	GMS Samandi	He was appointed against Disable quota. Approval of DSC not obtained

CT(Female)

According to dealing Assistant eighteen (18) posts of CT (Female) were lying vacant (Annex-X). Against the post of CT (Female) Ex-EDO issued twenty two (22) appointment orders.

Twenty appointment orders duly approved by DSC were notified vide office order Nos. 1976-78 dated 25.2.2011, 2125-28 dated 25.2.2011 and 2143-48 dated 25.2.2011 in three consolidated lists (Annexure-Y). Appointment order of Nargus Naureen is not traceable. Two appointment orders were issued in piecemeal and without obtaining approval of DSC. A number of anomalies were noticed in the appointments of twelve teachers. Miss Fareeda Khanum D/O Bahadar Shah who secured second position in the merit list was dropped for unknown reasons. Similarly Miss Nargus Naureen D/O Khan Badshah & Miss Rehana Guli D/O Muhammad Qasim (disable Quota) recommended by DSC for appointment was ignored for unknown reasons.

Sr. No.	Name of Candidate	Father's Name	Name of School	Date of Issue Order	Service Status	Remarks
1	Rukhtana Gul	Gul Marjan	GGMS Mash Habbullah	25.2.2011	-	
2	Narain Arshad	Raufat Khan	GGMS Jhang Khel	25.2.2011	-	SSC DMC not available, B.A degree and CT certificate seem fake. Being fresh candidate not entitled for experience marks. She possess the lowest merit.
3	Hameeda Bano	Zainud Din	GGMS Naqibullah Tajori	25.2.2011	-	BA Degree fake. CT certificate is also doubtful. All the documents are unattested.
4	Mahnoora Rehman (PST)	Gul Rehman	GGMS Wanda Shahab Khel	25.2.2011	-	
5	Rizwana Gul	Muhammad Qasim	GGMS Bharat Khel Landwah.	25.2.2011	-	Applied as fresh candidate but awarded two extra marks for experience.
6	Shabnum Bibi	Izaf Khan	GGMS Kotka Ayaz Khan Bakhmal Ahmadzai	25.2.2011	-	All the certificates are fake. All the documents are unattested.
7	Fayqa Bashir	Roshni Hussain	GGMS Abdul Khel	25.2.2011	-	She was appointed against retired employee with quota, which does not exist. She was at S.No. 48 in the session-wise merit list. She applied for the post of CT in May 2010 while her Mother retired in October 2010.
8	Samin Bibi	Muhammad Nawaz	GGHS Tajori.	25.2.2011	-	She was appointed against retired employee with quota, which does not exist. She applied for the CT post on 12.2.2011 i.e. 9 months after the last date of submission of application. She never appeared in the interview but appointed.
9	Rehana Shaheen	Zulfiqar Ahmad	GGMS Umer Daraz Tajori.	25.2.2011	-	Overage by 3 years 8 months. All the documents are unattested.
10	Rizwana Kokab	Abdul Hadi	GGMS Abdul Khel	25.2.2011	-	CT certificate not available. Hence, session is unknown. CNIC (Bannu) differs from domicile certificates (Lakki Marwat)
11	Hameeda Bibi PST	Ibrahim Khalil	GGMS Tati Murad.	25.2.2011	-	
12	Adila Tanq PST	Muhammad Tariq	GGMS Jhang Khel	25.2.2011	-	
13	Nargus Yarmin	Juma Khan	GGMS Mandan Majwala.	25.2.2011	-	
14	Binta Begum	Kanan Khan	GGMS Kheru Khel Pacca	25.2.2011	-	
15	Narain Gul	Syed M. Iqbal Ali	GGMS Naqibullah Tajori	25.2.2011	-	
16	Rehana Guli	Muhammad Qasim	GGMS Landwah.	25.2.2011	-	

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17	Mahboob Bibi	Habibur Rehman	GGMS Bachka Ahmadrai	25.2.2011		
18	Saima Malik	Momin Khan	GGMS Ghad Khel	25.2.2011		She passed CT examination in 2004. In the session-wise merit list 2002 has been reflected which is incorrect. From the merit list of 2009 it is evident that no candidate of 2003 session comes in the session-wise merit.
19	Ashraf D/S PGT	Alamdad Khan	GGMS Khwaja Khel	25.2.2011		
20	Khawariz Tahir PGT	Juma Khan	GGMS Kotka Ahmad Khan	25.2.2011		CT certificate not available. Hence, session is unknown.

TT(Female)

DCO Lakki Marwat floated an advertisement dated 11-6-2010 in the newspapers in which it was clearly mentioned that no one shall apply under disable quota for the reasons that no vacant post is available in the said quota (Annex-Z). Moreover due to stay order issued by the PHC Bench DI Khan further process was kept pending. Neither meeting of DSC was held nor any merit list was approved but appointment orders were issued by the Ex-EDO. During checking of record it was noticed that Miss Gulshan Bibi D/O Abdul Manan was appointed as Theology Teacher by the DCO against disable quota, in violation of court orders (Annex-AA). Since case was initiated by Ex-EDO therefore he is equally responsible. Similarly Miss Shehzadi Ambareen D/O Muhammad Yousaf was also appointed as TT (Female) and adjusted/appointed at GGMS Tajori Lakki Marwat. It may be pointed out her name was not in the list of candidates who appeared for Test & Interview.

Qari(Male)

Lt Col 40th Battalion, FF Regiment, Kohat recommended that Mr. Salim Dil Khan brother of Sepoy Khushdil Khan (Shaheed) may be appointed as Junior Clerk. No vacant post of Junior Clerk was available therefore he was appointed as Qari vide office order No. 4/19-24 dated 7-4-2010 without advertisement of post, preparation of merit list and convening meeting of DSC (Annex-AB). It may be pointed out that according to Mr. Salim Dil Khan s/o Rhan Dil Khan he is Matriculate, hence even not qualified for the post of Qari. Appointment of Mr. Salim Dil can be termed as irregular. For army shaheeds GHQ maintains waiting list and provides jobs. Since Sepoy Khushdil Khan (Shaheed) was an employee of Army therefore army authorities are supposed to provide job to his family members. Provincial Government provides jobs to bereaved family members of its own employees who die/expire during service. Such cases shall be initiated by the Department in which deceased was employed.

Lab Assistant

Ex-EDO appointed Mst Najma Bibi D/O Haq Nawaz as Lab Assistant (BPS-7) vide Notification No 2368-73 12-3-2010 at GGHS Shshbaz Khel without advertising the post. No test and interview was conducted. She has taken over the charge & is drawing her salary. Her appointment is also irregular (Annex-AC).

percent quota for females in all the Provincial Services (except to cadres exclusively reserved for females) and 0.5 percent for minorities (Annexure-AK). Contrary to these written instructions Ex-EDO recruited candidates against retired government son quota which does not exist at the moment. Provincial Government is bound to provide jobs to son/daughter of deceased government servants. Similarly Federal Govt and Army authorities are bound to provide jobs to the children of their deceased employees. Mr. Noor Hassan Khan, provided jobs to Mr. Salim Dil Khan Brother of Sepoy Khushdil Khan (Shaheed). He also appointed his own son Mr. Jamshed Ahmed; resident of Tari Khel as Junior Clerk at GHS Amir Wali vide office order No 2585-89 dated 17-3-2010 against deceased son quota.

RECOMMENDATIONS

- 1) Charge of illegal and irregular appointments leveled against Mr. Noor Hassan Khan, Ex-EDO Lakki Marwat stands proved without any doubt. Not only eligible and qualified candidates were deprived of their due rights but it also created liabilities for the Provincial Government. His illegal action lead to litigation and caused huge loss to Provincial exchequer. He appointed a large number of candidates without approval of the DSC. Mr. Noor Hassan Khan, Ex-EDO (E&SE) Lakki Marwat is personally responsible. Since he stands retired from service therefore in the light of FR 54-A disciplinary action cannot be taken at this stage therefore either an FIR may be registered with local police for recovery of losses caused to Provincial Exchequer or his case may be referred to NAB.
- 2) Members of DSC Mr. Muhammad Ayub Khan, DO (Male) and Mr. Shafiullah Khan, HRDO (Representative of DCO) signed merit lists, they are equally responsible. Mr. Muhammad Ayub, District Officer appointed his own son against quota reserved for Disable person. Both the officers may be reverted to lower post.
- 3) Mr. Amanullah, Head Clerk, Mr. Bahadar Zaman, Senior Clerk, and Mr. Haroon Badshah, Junior Clerk, EDO office, Lakki Marwat are responsible for preparation of merit lists, marking and maintenance of office record. They failed to perform their duties honestly. They also facilitated/supported the Ex-EDO in the illegal appointments. Stoppage of two increments for period of two years is recommended. They may also be transferred from the EDO Office immediately.
- 4) Mr. Noorani Shah, DDO in violation of court orders made payments. He may be reverted to lower pay scale.
- 6) Action may also be taken against Mr. Muhammad Akram Marwat dealing Assistant who processed appointment of Miss. Gulsan Bibi D/O Abdu Manan despite the fact in the advertisement it was clearly mentioned that quota reserved for disable does not exist therefore no one shall apply the same. The case of Gulshan Bibi was got approved.

General Observations

- 1) According to the E&AD letter No. SO(R-II)(S&GAD)5-2/80 dated 27-10-1981 in

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pursuance of the policy decision of the Federal Government, the question of reemployment of Armed Forces Personal in Civil posts was considered in Provincial Cabinet in its meeting held on 23-9-1981 and it was decided that ten percent of all vacancies to be filled in by initial recruitment are to be reserved for Ex-Servicemen at all levels. Amendments to be made in all the service rules keeping in view the interest of Ex-Servicemen. No exception is to be allowed at any department (Annex-AL). In the light of above all the departments including E&SE Department may amend the service rules particularly pertaining to teaching cadres to avoid litigations and court cases.

2) All the clerical staff working in the EDO offices who have completed their tenure must be transferred to other offices.

3) At the time of inviting applications computer printed forms were issued at a cost of rupees twenty (Rs 20/-) per candidate (Annex-AM). Amount collected by the Ex-EDO on account of cost of application has not been deposited in the treasury but unlawfully utilized which may also be recovered.

4) In order to discourage production of fake documents the EDO must register cases with local police or Anti Corruption Establishment against those whose appointment orders have been terminated on account of production of fake certificates/degrees or produced fake appointment orders:

5) Services of all the persons appointed without advertisement of post, preparation of merit list and approval of DSC may be terminated after serving them with show cause notices.


1-3-13

MUHAMMAD HUMAYUN
INQUIRY OFFICER.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) LAKKI MARWAT

No. 2503

Dated 27/04/2015

To.

1. Sub Divisional Education Officer (M)
Lakki Marwat

Subject: **AUTHORIZATION OF INQUIRY U/S 18 (C) OF NAO 1999 INQUIRY AGAINST NOOR HASSAN EX-DISTRICT EDUCATION OFFICER LAKKI MARWAT (BPS-19) AND OTHERS REGARDING MISUSE, OF AUTHORITIES, ILLEGAL APPOINTMENT ORDERS IN DIFFERENT CADERS/CORRUPTION AND CORRUPT PRACTICES.**

Memo

You are directed to intimate this office total amount drawn regarding the pay of illegal appointments made by Mr. Noor Hassan Khan Ex-Executive District Officer Lakki Marwat of each appointee by giving detail from the date of appointment to date.

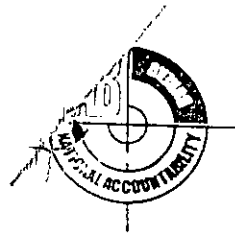
The above information are urgently required for onward submission to the National Accountability Bureau Khyber Pakhtunkhwa on the format given as under.

S.No	Name	Designation	Order No. dated	Date of Taking over charge	Total amount drawn	Personal No	Remarks
1	XYZ	RST					1. Photocopy of first Pay Bill drawn /Source - I 2. Appoint: Order 3. Charge report MUST BE ATTACHED

(Registry No: 1302
dt: 27/04/2015)

District Education Officer
(Male) Lakki Marwat

27/4



GOVERNMENT OF PAKISTAN
NATIONAL ACCOUNTABILITY BUREAU
PDA COMPLEX BLOCK-III PHASE-V HAYATABAD
KP PESHAWAR

NOTICE U/S 19 NA ORDINANCE, 1999

To: The District Education Officer (Male)
Lakki Marwat Khyber Pakhtunkhwa.

Subject: - **AUTHORIZATION OF INQUIRY U/S 18 (C) OF NAO 1999-INQUIRY AGAINST NOOR HASSAN EX-DISTRICT EDUCATION OFFICER LAKKI MARWAT (BPS-19) AND OTHERS REGARDING MISUSE OF AUTHORITY, ILLEGAL APPOINTMENTS ORDERS IN DIFFERENT CADRES/ CORRUPTION AND CORRUPT PRACTICES**

National Accountability Bureau KPK Peshawar is conducting the subject inquiry under NA Ordinance 1999. The documents / information useful or relevant to the inquiry are in your control or you are acquainted with facts and circumstances of the case.

2. Therefore, you are requested to provide the under mentioned record / information to Investigation Officer **Rafiuddin** for examination on or before **24. 04. 2015** at NAB (KP) Block-III, PDA Complex, Phase-V, Hayatabad, Peshawar.

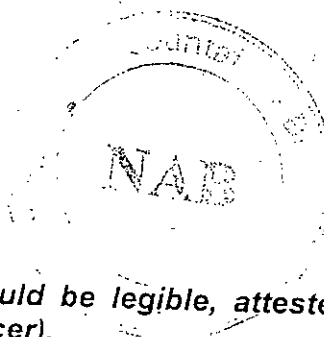
3. This notice is issued under Section 19 of the NA Ordinance, 1999 which provides that any one who fails to provide information / record requisitioned or knowingly provides false information / record or refuses to answer the question, shall be liable for prosecution under NA Ordinance, 1999.

LIST OF RECORDS/DOCUMENTS REQUIRED

1. Copy of advertisement for vacant posts during the tenure of Noor Hassan.
2. Detail of vacant posts for each category.
3. Detail of recruitment process with marking sheet and recommendations of the selection committee.
4. Committee constituted for appointment/selection.
5. Responsibilities assigned to selected members.
6. Minutes of constituted committee.
7. Total number of applications received for each category.
8. Merit list of candidates.
9. Short listed candidates.
10. List of total appointed candidates each category.
11. Approval list of appointed candidates from the concerned committee.
12. Copy of appointment letters issued.
13. Verification received of degree/certificates from concerned institutes.
14. Present status of candidates either serving or terminated.
15. Total withdrawals made by illegal appointees alongwith their personal numbers.

No. 1/25/IW-I/NAB (KPK) 235

Dated 26 April, 2015



Deputy Director (Coord)
(Muhammad Umar Khan)
Ph # 091-9217874

(The requisite documents should be legible, attested and with covering memo addressed to Investigation Officer).


OFFICE OF THE DEO (M) E & Se. Lakki

No 2/74-79 dtd — 9.4.2015

Copy to The

- 1) DEO (F) Lakki Marwat
- 2) DY/DEO (M) Local office
- 3) ADD (Est)
- 4) Supdt (Est)
- 5) D.A concerned (M) Category
- 6) Dm & dispatch clerk

with the direction to direct all concerned to provide the list of record / documents 1-15, up to 20/04/15 to the undersigned positively, as directed by NAB. KP. Peshawar



District Edu: Officer
(Male) Lakki Marwat

19/4/15

Even No/dtd:

Copy to the

DY/ Director CORD with reference to his NO: Notice U/S 19/NAO, 1999/ 1/25/ JW-1/235 dtd 6/4/15.


District Edu: Officer
(Male) Lakki Marwat

19/4/15



GOVERNMENT OF PAKISTAN
NATIONAL ACCOUNTABILITY BUREAU
PDA COMPLEX BLOCK-III PHASE-V HAYATABAD
KP PESHAWAR
SAY NO TO CORRUPTION

NOTICE U/S 19 NA ORDINANCE, 1999

To: The District Education Officer (Female)
Lakki Marwat Khyber Pakhtunkhwa.

Subject: PROVISION OF INFORMATION U/S 19 OF NAO 1999-INVESTIGATION AGAINST NOOR HASSAN EX-DISTRICT EDUCATION OFFICER LAKKI MARWAT (BPS-19) AND OTHERS REGARDING MISUSE OF AUTHORITY, ILLEGAL APPOINTMENTS ORDERS IN DIFFERENT CADRES/ CORRUPTION AND CORRUPT PRACTICES

National Accountability Bureau KPK Peshawar is conducting the subject investigation under NA Ordinance 1999. The documents / information useful or relevant to the investigation are in your control or you are acquainted with facts and circumstances of the case.

2. Therefore, you are requested to provide the under mentioned record / information to Investigation Officer Rafiuddin for examination on or before 12.08. 2015 at NAB (KP) Block-III, PDA Complex, Phase-V, Hayatabad, Peshawar.

3. This notice is issued under Section 19 of the NA Ordinance, 1999 which provides that any one who fails to provide information / record requisitioned or knowingly provides false information / record or refuses to answer the question, shall be liable for prosecution under NA Ordinance, 1999.

LIST OF RECORDS/DOCUMENTS REQUIRED

Please provide following information in the instant case:

- Original record of appointments made during the tenure of Ex-EDO Noor Hassan.
- List of total appointments also mentioning whether illegal/irregular.
- Complete record of departmental inquiries and court judgments.
- Status of court case filed by illegal appointees against the department.
- Number of appointments made prior to advertisement and their current status.

No. 1/25/IV-1/NAB (KPK) 802

Dated 11 August, 2015

Deputy Director (Coord)
(Muhammad Umar Khan)
Ph # 091-9217874

(The requisite documents should be legible, attested and with covering memo addressed to Investigation Officer).

From : Noor Hassan Khan
Br - EDO (Br SE)
Cariac Point

To : The Dist's office (M)
(EASU) Cariac Point

Subj: Verification of P.S.T (M&F) Appointment orders/D.M (F)

Reference your No. 1128 dated 28/12/2012 on the above, it is stated that the following orders have not been signed by me and are bogus.

- (1) Burhanullah s/o Raza Khan order No 96-100 dtd 24/1/2011
- (2) Noor Majid Khan s/o Mir Sada Khan order No 117-20 dtd 24/1/2011
- (3) Mumtaz Ullah s/o Asghar Khan _____ do _____
- (4) Rashidullah Khan s/o Saadullah Khan order No 274-78 dtd 24/1/2011
- (5) Hikmatullah s/o Asmatyallah order No 155-59 dtd 24/1/2011
- (6) Saifullah Khan s/o Noor Ali Khan _____ do _____
- (7) Meekim Nayab s/o Nagriullah (DM) order No 117-20 dtd 24/1/2011
- (8) Farhadi Mubin s/o Rais Khan order No 71465-68 dtd 24/1/2011
- (9) Rukhsana Bi Bi s/o Saib Khan _____ do _____
- (10) Samreen Bi Bi s/o Noubar Khan order No 155-59 dtd 24/1/2011
- (11) Fauziya Saleem s/o Muhammad Sabir order _____ do _____
- (12) Shahida Begum s/o Muhammad Gulshan order No 287-89 dtd 24/1/2011
- (13) Asma Gul s/o Yous Muhammad _____ do _____
- (14) Mehroz s/o Akram Zeb Khan 0 _____ do _____
- (15) Farzeelat Bi Bi s/o Gul Zaman order No 175-78 dtd 19/1/2011

Moreover specimen signatures are also sent herewith for verification of orders with these signatures to avoid further same practice.

Noor Hassan Khan
Br - EDO (Br SE)
Cariac Point
P.O. S. Khoshji Payan,
Nagbora

Verified

Noor Hassan Khan
13/2/2014
Br - EDO (Br SE)
Cariac Point

From: Noor Hassan
EOL-EDO (Ex SE)
Larici Ahmad

To: The Special Govt's Pleader,
Larici Ahmad.

Sbs: Verification of PSI (M & F) Appointments & orders.

Memo:-

Reference your letter No 44 dated 2/2/2013.

It is stated for your kind information that the following orders have not been signed by the undersigned and be treated as Bogus due to false signatures.

(1) Farooq Ahmad S/o Dim. Muhoumar Order No 275-30 dtd 22/2/011

(2) Samseen Bi Bi D/o M. M. M. Order No 278-81 dtd 22/2/011

(6954/14) (3) → Bakht Nanna D/o Farooz Khan Order No 262-66 dtd 10/2/011

(4) Saifud Din S/o Saifud Din Order No 1615-20 dtd 19/2/011

Moreover it is requested that in future original orders may be sent for verification as photo copy signatures are not authentic.

Noor Hassan
3/2/013

EOL-EDO (Ex SE)
Larici Ahmad

Verified

Noor Hassan
13/2/014
EOL-EDO (Ex SE)
Larici

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 493/2014

Gul Badshah

Versus

D.E.O & others

REJOINDER

Respectfully Sheweth,

Preliminary Objections:-

All the 06 preliminary objections are illegal and incorrect. No reason in support of the same is ever given as to why the appellant had no cause of action, locus standi, non maintainable, unclean hands, concealment of material facts, bad for miss and non joinder of parties malafide fabricated appointment letter.

ON FACTS

1. Not correct. The para of the appeal is correct regarding requisite qualifications, appointment as PST on the recommendation of DSC, etc with proof as (Annex "A")
2. Not correct. Charge was assumed at the said school and is performing duties till date. Every year inspection of the school was/is made by the authority with remarks entered in the Register kept in the school.
3. As above. Proper signature on the Attendance Register is made by the head of the school.
4. Admitted correct to the extent of submission of representation by the respondents. Appellant has no concern with any inquiry, pending disposal against appellant.

G R O U N D S :

All the grounds of the appeal are legal and correct while that of the reply are illegal and incorrect. As for as inquiry of the PIT is concerned, the same was carried out against Noor Hassan khan Ex EDO, M.Ayub khan DO now died, Noorani shah DDO, Shafiullah PS, DCO, Aman ullah Head clerk, Bahadar Zaman senior clerk, Haroon Badshah junior clerk. Appellant was not figured in the inquiry report anywhere.He was never associated with the inquiry as is evident from the same.

It is, therefore, most humbly requested that the appeal be accepted as prayed for.

GulBadShah

Appellant

Through

Saadullah Khan Marwat

Saadullah Khan Marwat

Dated: 5.09.2016

Arbab Saif Ul Kamal

Arbab Saif Ul Kamal

Miss Rubina Naz

Miss Rubina Naz
Advocate,

A F F I D A V I T

I, Gul Badshah S/o Yousaf Jan, Appellant, do hereby solemnly affirm and declare that contents of **Rejoinder** are true and correct to the best of my knowledge and belief. While that of the reply of respondents are illegal and incorrect.

I reaffirm the same on oath once again to be true and correct as per the available record.

GulBadShah

DEPONENT