

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

S.A # 1469/2023

Mr. Umair Matloob Appellant

Versus

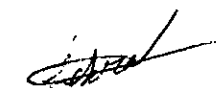
Govt of Khyber Pakhtunkhwa,
Through Secretary, Higher Education,
Khyber Pakhtunkhwa, Peshawar
& others.....

Respondents

DATE OF HEARING = 01/11/2023

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Respondents



**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI, CHAMKANI STOP, PESHAWAR**

Tel # 091-2650024 / Fax # 091-2260181

E-mail:- dhekpkesh@gmail.com Facebook.com/dhekpkeshwar Twitter.com/dhekpkeshwar1

AUTHORITY LETTER

Mr. Sohrab, (Lecturer in Law) Govt. Degree College, Mathra is hereby authorised to submit the Parawise Comments in Service Tribunal, Peshawar in case S.A # 1469/2023 Mr. Umair Matloob versus Govt: of Khyber Pakhtunkhwa on behalf of respondents.

**Law Officer (H.E.D)
Muhammad Sohrab Khan**

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

S.A # 1469/2023

Mr. Umair Matloob Appellant

Versus

Govt of Khyber Pakhtunkhwa,
Through Secretary, Higher Education,
Khyber Pakhtunkhwa, Peshawar
& others.....

Respondents

AFFIDAVIT

I, Sohrab, Lecturer in Law, Govt Degree College, Mathra, Peshawar do hereby declare and affirm on oath that the contents of parawise comments are correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court. It is further stated on oath that in this appeal the answering respondents have neither been placed ex-parte nor their defense has been struck off.

Identified by:



Sohrab

Deponent

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

S.A # 1469/2023

Mr. Umair Matloob.....Appellant

Khyber Pakhtunkhwa
Service Tribunal

Versus

Case No. 8739

Govt. of Khyber Pakhtunkhwa
Through Secretary
and Director, Higher Education Peshawar..... Respondents

Dated 31-10-2023

SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 to 3

Respectfully Sheweth: -

Preliminary Objections:-

1. That the appellant has got neither cause of action nor locus standi to file the instant Service Appeal.
2. That the appellant has not come to this Tribunal with clean hands.
3. That the appellant is estopped by his own conduct to file the instant appeal.

Facts: -

- 1) Correct to the extent that the appellant was appointed as Beshashti (BPS-03) vide appointment Order dated 26/04/2021 at Govt. Degree College, Khanpur, District Haripur and was given responsibilities in the Clerk Office (**Annex-A**)
- 2) Incorrect. That on 08/12/2022 the respondent no. 3 was informed by the National Bank of Pakistan Khanpur Branch about suspicious transaction/withdrawals. On probing, the respondent no. 3 came to know that Umair Matloob withdrew an amount of 1324000/- (Thirteen Lac Twenty-Four thousand) illegally from College pupil fund by forged signature of the principal. The respondent no. 3 vide office order dated 09.12.2022 constituted inquiry committee comprising Mr. Tariq Naveed Qureshi, Associate Professor & Mr. Sami Ullah Shah, Assistant to conduct fact finding inquiry (**Annex-B**). The inquiry committee investigated and record statement of concerned staff members including the appellant wherein the appellant confessed that he has withdrawn the money illegally from college account and also did fake signature of the principals (**Annex-C**). It is pertinent to mentioned here that the family of the

appellant submitted the illegally withdrawn amount by the appellant the very next day (Annex-D). Statement of the Bank Manager was also recorded wherein he has clearly mentioned that the appellant cashed two Cheque on 08.12.2023 (Annex-E). The Inquiry committee submitted its recommendation on 07.01.2023 (Annex-F). In light of the recommendation of fact finding inquiry committee, the respondent no. 3 initiated formal inquiry against the appellant and constituted inquiry committee vide order dated 10.01.2023 (Annex-G). Statement of allegations (Annex-H) and charge sheet (Annex-I) were served upon the appellant. The appellant submitted the reply wherein he confessed all the charges/allegation (Annex-J). The inquiry committee served upon him the questioner (Annex-K) and the appellant gave confessional statement on oath before the inquiry committee (Annex-L). Show cause was served upon the appellant on 28/01/2023 (Annex-M). The appellant requested for personal hearing (Annex-M) which was provided to him on 06.02.2023 (Annex-N) and after fulfillment of all codal formalities the appellant was removed from service vide notification dated 06.02.2023 (Annex-O)


- 3) Correct, to the extent that charge sheet & statement of allegation were served upon the appellant, rest of the para is misleading, the appellant has confessed the charges/allegations before the inquiry committee as already explained in para 2 and documentary evidence is also attached.
- 4) Correct to the extent that the appellant has been removed from service vide notification dated 06.02.2023.
- 5) Correct to the extent that the appellant filed departmental appeal and respondent no. 2 assigned task to Mr. Waheed Akbar Awan Principal, Govt. Degree College, Ghandaf Haripur vide letter dated 15.06.2023 to conduct fact finding inquire (Annex-P). and the inquiry officer also recommended to regret his appeal (Annex-Q) personal hearing in the said appeal was scheduled on 06.09.2023 (Annex-R)
- 6) Incorrect. That the appellant is not aggrieved as he himself confessed all the allegations/charges.


Grounds: -

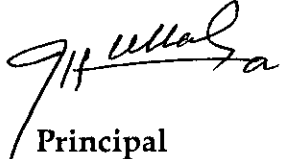
- A. Incorrect. As already explained in para 2 of facts, all the codal formalities are fulfilled.
- D. Incorrect. That show cause notice dated 28/11/2023 has been served upon the appellant as already explained in para 2.
- E. Incorrect. That the appellant was part of the disciplinary proceedings he submitted written statement, reply to questioner and personal hearing was also granted to him on 06.2.2023 as already explained in para 2 and documentary evidence is also attached.
- F. Incorrect. As already explained in para 2.
- G. Incorrect. As already explained in para 2.
- H. Incorrect. That the respondent may be allowed to raise additional grounds at the time of arguments

Prayer:-

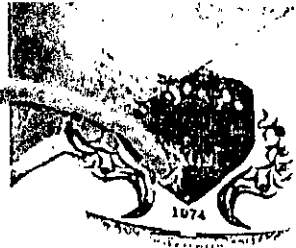
It is, therefore, humbly prayed that the instant Service Appeal is based on misconception/misstatements hence may graciously be dismissed.


Secretary,
Higher Education Department
Khyber Pakhtunkhwa
Respondent No. 1


Director
Directorate of Higher Education,
Khyber Pakhtunkhwa
Respondent No. 2


Principal
Govt. Degree College, Khanpur, Haripur
Respondent No. 3
PRINCIPAL
Govt. Degree College
Khanpur (Haripur)

Ank-A



GOVERNMENT OF KHYBER PAKHTUNKHWA
GOVT: DEGREE COLLEGE,
TARNAWA KHANPUR, (HARIPUR).

Telephone #: 0995-354151
email: hr4110gdckhanpur@gmail.com



No. 181-188/21

Dated: 26 / 04 / 2021.

APPOINTMENT ORDER:-

Consequent upon the recommendation submitted by the Department Selection Committee, the competent authority is pleased to appoint the following candidates against the vacant posts of Class-IV servants mentioned against their names in BPS-03 (9,610-390-21,310) plus other usual allowances as admissible under the rules (Regular Policy) from the date of taking over charge on the terms and conditions mentioned below:

Sr No.	Name	Father Name	CNIC	Address	Designation	Remarks
1	ZAHEER ABBAS	GUL AZIZ	13302-5073100-5	Village Najafpur, Khanpur,	Laboratory Attendant	AVP
2	UMAIR MATLOOB	MUHAMMAD MATLOOB	13302-1967718-1	Moh: Qazlan, Khanpur	Behishti	AVP

Terms and Conditions:

1. The candidate shall produce Health & Age Certificate from the Medical Supdt: DHQ, Haripur before the taking over Charge.
2. He will have all the rights / privileges contained in Khyber Pakhtunkhwa Civil Servants Act, 1973 with all amendments made therein including Khyber Pakhtunkhwa Civil Servant (Amendment) Act, 2013 and Rules made therein.
3. In case of resignation the official will have to give one month prior notice or his one month pay all allowances shall be forfeited to Government treasury.
4. They will be governed by such rules and regulations issued from time to time by the Provincial Government.
5. In case of disciplinary matters Khyber Pakhtunkhwa Government Servants (efficiency and disciplinary) rules 2011 shall be applicable.
6. Charge reports should be submitted to all concerned.
7. They will produce clearance / verification certificate for their CNIC from NADRA / Franchise.
8. No. TA / DA is allowed to join duty.
9. He will be on probation for a period of 01 Year extendable up to 02 Years.
10. They must join their posts within 30 days of the issuance of this notification.



J. H. Ullah
PRINCIPAL,
GOVT: DEGREE COLLEGE
KHANPUR (HARIPUR).

Endst: No. & Dated Even

Copy of the above is forwarded to the:

1. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Dy: Director (Establishment), Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Members of the Departmental Selection Committee for their recommendations on 24/04/2021.
4. District Accounts Officer, Haripur.
5. Manager Employment Exchange, Haripur.
6. Officials concerned

B

Ann-B

OFFICE OF THE PRINCIPAL, GOVERNMENT DEGREE COLLEGE
KHANPUR, HARIPUR

No. 675/2

Dated: 09/12/2022

NOTIFICATION

The following fact finding committee is being constituted hereby to inquire the financial irregularities found in the pupil fund after getting the statement of account from the National Bank of Pakistan, Khanpur Branch. The committee is directed to submit their report within 3 days.

1. Mr. Tariq Naveed Quershi, Associate Professor of Physics (BPS-19), Chairman
2. Mr. Sami Ullah Shah, Assistant (BPS-16), Member

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PRINCIPAL
Govt Degree College
PRINCIPAL
GDC KHANPUR, HARIPUR

C

Ana-C

(Khan)

بیان حلفی

کوالہ فرد حرم منیر 21/23 دورہ 2023/01/10 مانڈ کردہ

کوالہ فرد حرم منیر ڈاگری کالج خانیوردھری پور) میں سٹی ٹیچر
مطالبہ نمبرہ پیشہ (BPs-3) ہذا اعلیٰ کو حاضر و ناظر جان کر اقرار
کرتا ہوں کہ تمام سولہ چیک ہیں نے بذات خود کسی بھی کالج ملازم
کی مراد، طائفے یا حمایت کے بغیر بذات خود ہماری سے کالج اور
کوالہ فرد حرم منیر کئی بہر لگائی اور خود دستخط کیے۔ صحت
کاٹا میں رقم مختلف لوگوں سے کالج سے باہر لگوائی۔

کمیٹی مطالبہ

13302-1967718-1

تاریخ 2023-01-24

Annex - D

S.NO	DATE	CHEQUE NO.	AMOUNT
1	10/11/2022	293917075	90,000
2		293917094	
3	14/11/2022	293917095	80,000
4	16/11/2022	293917100	65,000
5	17/11/2022	293917101	73,000
6	18/11/2022	293917102	62,000
7	21/11/2022	293917118	89,000
8	23/11/2022	293917119	91,000
9	25/11/2022	293917130	77,000
10	2/12/2022	293917133	96,000
11	5/12/2022	293917110	97,000
12	5/12/2022	293917108	73,000
13	6/12/2022	293917106	87,000
14	7/12/2022	293917135	94,000
15	7/12/2022	293917114	83,000
TOTAL			1,157,000

16	8/12/2022	293917128	79,000
17	8/12/2022	233917142	88,000
TOTAL			167,000
GRAND TOTAL			1,324,000

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74 11/11

CASH/TRANSFER PAY IN SLIP

Date: 12-12-22

Branch: National Bank of Pakistan, Khairpur
 Account Type: PLS Saving Current Other
 Title of Account: Public Officer
 A/C No: 13302-30327769
 Currency: PKR USD EURO GBP Others

Bank / Branch (Drawee)	Cheque/Instrument No.	Denomination	Amount
		5000 x	
		1000 x	79,000
		500 x	
		100 x	
		50 x	
		20 x	
		10 x	
		Cash	
Total Amount			

Total Amount In Words: Seventy Nine Thousand
 RECEIVED BY: [Signature]
 Cashier's Signature with Stamp

Depositor's Signature: [Signature]
 Name: [Name]
 Contact No: [Number]
 C.N.I.C. #: 13302-30327769

Sr. No. 3147635 AUTHORIZED OFFICER'S SIGNATURE

RECEIVED BY CASH

We have read, understood and accepted the terms and conditions printed overleaf

CASH/TRANSFER PAY IN SLIP

Date: 09-12-22

Branch: National Bank of Pakistan, Khairpur
 Account Type: PLS Saving Current Other
 Title of Account: Govt. Degree College Khanpur, Hanpur
 A/C No: 13302-30327769
 Currency: PKR USD EURO GBP Others

Bank / Branch (Drawee)	Cheque/Instrument No.	Denomination	Amount
		5000 x	
		1000 x	
		500 x	
		100 x	
		50 x	
		20 x	
		10 x	
		Cash	
Total Amount			715,700

Total Amount In Words: Seven Lacs and Fifty Seven Thousand only
 RECEIVED BY: [Signature]
 Cashier's Signature with Stamp

Depositor's Signature: [Signature]
 Name: [Name]
 Contact No: 13302-30327769
 C.N.I.C. #: [Number]

Sr. No. 3147636 AUTHORIZED OFFICER'S SIGNATURE

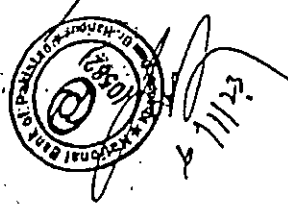
RECEIVED BY CASH

We have read, understood and accepted the terms and conditions printed overleaf

خواجہ خانپور کے دو چیلنجیشنز میں دو ٹوٹا ہوا نوٹ بھرا پاس کورٹمنٹ ڈگری ملانے
 یعنی ہے۔ اور چیلنجیشن نمبر 293917142 ہے جس میں سے ایک چیلنجیشن کی مالیت 790000
 ہے۔ اور چیلنجیشن نمبر 293917142 ہے۔ جبکہ دوسرا چیلنجیشن جس کی مالیت 293917142
 ہے۔ یہ دونوں چیلنجیشن بھرا پاس ڈگری
 خواجہ خانپور کے ملازم عظیم ملکوٹ جو کہ حسب معمول خواجہ کے پاس ہیں ان
 کے لیے آگاہی عظیم ملکوٹ کے یہ چیلنجیشنز پر ایشیا کے پیمزمنٹ کے
 اور پیمزمنٹ کے پیمزمنٹ کے عمر دستاویزی وجہ سے عظیم ملکوٹ کو ایشیا پیمزمنٹ
 کمری اور بعد میں جب ایشیا کے پیمزمنٹ چلا۔ تو پیمزمنٹ کے دوران چیلنجیشن
 کے دستخط کو پیمزمنٹ کے دستاویز سے مل گیا۔ تو ان میں سے فرق پایا گیا
 اور پیمزمنٹ کے دستخط کو (CERTIFY) کرنے کے لیے پیمزمنٹ کو ایشیا کے خواجہ
 کو مل گیا۔ اور ان سے برہنہ چلا کہ چیلنجیشن پر موجود سائنس پیمزمنٹ کے
 پاس اور ان سے برہنہ چلا کہ چیلنجیشن پر موجود سائنس پیمزمنٹ کے
 پیمزمنٹ کے چیلنجیشن کے نمائندوں کے عظیم ملکوٹ کی تین تین تاروں کی نمائندگی
 مسئلہ کمری ہے تاکہ اب اس سیشن کو بینجھو ملیں۔

دراپہ حسین احمد
 خواجہ خانپور ڈیپوٹ

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F

Ann-F

(Annexure 1)

(14)

The Principal,
Government Degree College,
Khanpur, Haripur.

Subject: REPORT OF FACT FINDING COMMITTEE REGARDING
IRREGULARITIES IN PUPIL FUND

MEMO:

The committee constituted by principal regarding the above-mentioned subject held several meetings with all concerned staff members to find the facts about irregularities to find the

Foregrounds of Fact Finding:

On 08th December 2022 Principal told the committee that he received a call from NBP Khanpur branch that two cheques amounting Rs. 79000/- and Rs. 88000/- brought by Mr. Umair Matloob (Beheshti) of the college, and the signatures of principal on the cheques are not matching with your specimen signatures.

Principal contacted Mr. Zia ur Rehman (senior clerk who keeps the cheque book of Pupil Fund a/c) just after receiving this information from bank and instructed him to investigate about these cheques as Principal did not signed any cheque on the same day. When Mr. Zia ur Rehman contacted the bank and inquired about cheques it was confirmed that the signatures on both the cheques are forged.

In the meanwhile Mr. Zia ur Rehman try to contact Mr. Umair Matloob but failing which he contacted to Mr. Haris Matloob (brother of Mr. Umair Matloob) and told him about the situation. He accepted to pay the amount Rs. 167,000/- and handed over to Mr. Zia Ur Rehman. The next day Mr. Zia Ur Rehman deposited the amount in Pupil Fund a/c and got bank statement which showed that different cheques amount Rs. 1,157,000/- were drawn the forged signature and stamp of the DDO / Principal in addition to the amount submitted on 09/12/2022. As the MR. Haris Matloob was along with Mr. Zia ur Rehman in the Bank so Mr. Umair Matloob family accepted and pay the remaining amount Rs. 1,157,000/- after lessening voice massage of Mr. Umair Matloob.

To find the facts and figures Principal constituted a committee comprising the following:

- | | | |
|-----------------------------|----------------------------|----------|
| 1- Mr. Tariq Naveed Qureshi | Associate Prof: of Physics | Chairman |
| 2. Mr. Samiullah Shah | Assistant: BPS 16 | Member |

Committee started his work after a short briefing by Principal about the situation. Committee moved forward in the assignment in the following way. (briefing of Principal is hereby attached in the form of statement as Annexure 1) in light of briefing

167,000/-+1,157,000/-= 1,324,000/- details of cheques having Cheque No., dated and amount is attached with statement of Mr. Zia ur Rehman with the annexure II.

In the mean while Mr. Zia ur Rehman received a Voice message of Mr. Umair Matloob of doing all these illegal cheque withdrawals. After looking evidences, family of Mr. Umair Matloob agreed to pay back all the remaining amount of Rs.1,157,000/- which they handed over to Mr. Zia ur Rehman and he deposited in College account on 09/12/2022.

3- In his statement Mr. Ashfaq Ahmed told the committee that stamps remain in his draw and all the office members use these stamps according to their need, he told that the stamps on the cheques have been embossed in his absence and he has no knowledge about stamping of these cheques.

4- In the statement if Mr. Asif Mehmood Naib Qasid, he stated that he and Mr. Umair Matloob both are working in admin office as Naib Qasid and we both are custodian of offices keys.

5- According to his statement, Mr. Umair Matloob admitted of drawing these cheques having forge signatures and have been paid back by him / his family to the College.

6- National Bank of Pakistan Khanpur Dam Branch manager Mr. Raja Habib Ahmed stated in his statement that he informed the Principal on 08/12/2022 about last two cheques but manager did not give any details about other 14 cheques cash earlier from bank during 10/11/2022 to 07/12/2022.

Conclusion of the committee.

Committee concludes that:

1. An amount of Rs. 1,324,000/- have cashed through different cheques from pupil fund account.
2. The amount then recovered and re-deposited in the same account on 09/12/2022.
3. These cheques have been taken out from the cheque book along with counter files, by Umair Matloob, and drawn by him using forged signatures of DDO and stamps on various date between 10/11/2022 to 8/12/2022.
4. The custodian of the Cheque book Mr. Zia ur Rehman did not handled the cheque book professionally.
5. All the staff of the College have an open access to use the stamps of the different cadre for attestation of NADRA registration forms and documents attestation etc.

In the light of the above fact finding report, it is suggested that the matter needs to be probed further.

1- Mr. Tariq Naveed Qureshi Associate Professor

Chairman

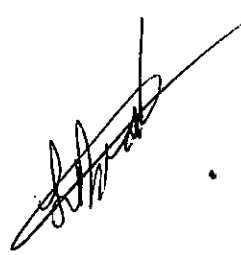


2. Mr. Sami Ullah Shah Assistant

Member



27/11/2023



G

Ans - G

OFFICE OF THE PRINCIPAL, GOVERNMENT DEGREE COLLEGE
KHANPUR, HARIPUR

No. 23/23

Dated: 10/01/2023

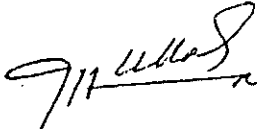
INQUIRY ORDER

In pursuance of Rule 5(b) of the Government Servants (Efficiency & Discipline) Rules, 1973, the I am pleased to appoint inquiry Committee to conduct inquiry proceedings against Mr. Umair Matloob.

2. The inquiry shall be conducted in accordance with the provisions of the Government Servants (Efficiency & Discipline) Rules, 1973 and the report shall be submitted to the undersigned within 30 days of the conclusion of the proceedings.

3. Copies of the charge sheet served upon the accused and statement of allegation are enclosed.

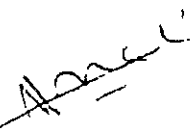
Encl. As Above


Principal

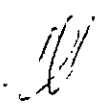
GDC Khanpur, Haripur

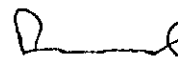
PRINCIPAL
Govt. Degree College
Khanpur, Haripur

1. Mr. Tahir Naseem, Associate Professor of mathematics, GDC Khanpur, Haripur

(Convener) 

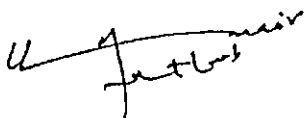
2. Mr. Tariq Naveed Quershi, Associate Professor of Physics, GDC Khanpur, Haripur

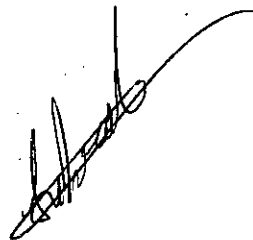
(member) 

3. Mr. Sajawal Khan, Assistant Professor of English, GDC Khanpur, Haripur (member) 

Copy to:

- i) The Umair Matloob
Behishti, BPS-03.





H

Annex-H

(Annex-17)

OFFICE OF THE PRINCIPAL, GOVERNMENT DEGREE COLLEGE
KHANPUR, HARIPUR

No. 22/23

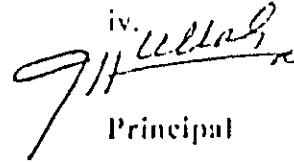
Dated: 10/01/2023

STATEMENT OF ALLIGATIONS

Mr. Umar Matloob, Behishti BPS-03, presently working as Naib Qasid, is accused of inefficiency / corruption/ misconduct/arising out of the following acts of omission and commission.

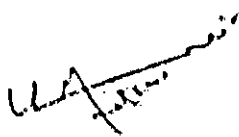
That while posted as Naib Qasid in Assistant Office you:

- i. Stole 16 leaves of cheques with counter files.
- ii. Signed the cheques with membrane signature of the DDO Principal
- iii. Draw the cheque of amounting Rs. 1,354,000/
- i. Willful absence w.e.f 9/12/2022 to 24/12/2022

iv. 
Principal

GDC Khanpur, Haripur

PRINCIPAL
Govt. Degree College
Khanpur (Haripur)





I

Ann-I

①
Annex-18

OFFICE OF THE PRINCIPAL, GOVERNMENT DEGREE COLLEGE
KHANPUR, HARIPUR

No. 21/23

Dated: 10/01/2023

CHARGE SHEET

WHEREAS the 'Authority' in your case in terms of rule 2 of Government Servants (Efficiency and Discipline) Rules, 1973 is of the opinion that sufficient grounds exist to proceed against you in terms of rule 3 (b), (c), and (f) thereof; and

2. WHEREAS I, AttaUllah Jan, Principal, Government Degree College Khanpur, Haripur as Authorized Officer in your case, have decided to proceed against you under rule 5 of the Government Servants (Efficiency and Discipline) Rules, 1973; and

3. WHEREAS, I, consider that in the light of the facts of the case and in the interest of justice, it is necessary to hold an enquiry through an Enquiry Committee; and

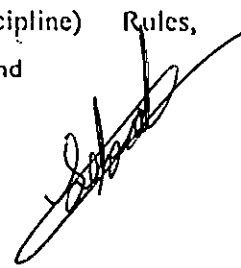
4. THEREFORE, you Mr. Umair Matloob, Bhashiti, BPS-03, Class-IV, Presently posted as Naib Qasid in the office of the Assistant GDC Khanpur, are hereby charged as under:

That while posted as Naib Qasid in the office of the Assistant GDC Khanpur, you committed the following acts of misconduct and corruption.

- i. Stole 16 leaves of checques with counter files.
- ii. Signed the checques with membrane signature of the DDO/Principal
- iii. Draw the cheque in different dates of amounting Rs. 1,354,000/=
- iv. Willful absence w.e.f 9/12/2022 to 24/12/2022

5. By reason of the above you appear to be:

- a. Guilty of misconduct within the meaning of rules 2(1) and 3(b) of the Government Servants (Efficiency and Discipline) Rules, 1973 for the said commission/omission on your part; and



b. Corrupt or may reasonably be considered as corrupt within the meaning of rule 3(c) of the Government servants (Efficiency and Discipline) Rules, 1973

6. And where as, by reason of the above read with details given in the enclosed statement of allegations, you are liable to Disciplinary action under rules 3 of the Government Servants (Efficiency and Discipline) Rules, 1973 which may involve imposition of the penalty of dismissal from service prescribed under rule 4 of the said Rules.

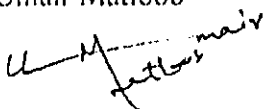
7. Now therefore, you are hereby required to submit your written defense to the above charges within fourteen (14) days of the receipt of this charge sheet, explaining as to why disciplinary action, as aforesaid, should not be taken against you, and stating at the same time whether you also desire to be heard in person.

8. Please take notice that your written defense should reach within the aforesaid period direct to Mr. Tahir Naseem, Associate Professor of Mathematics, who has been appointed as Convener to the Enquiry Committee, failing which it shall be presumed that either you have no defense to offer or you have declined to offer the same and accept the charges and in that case action shall be taken ex-parte.


Principal

GDC Khanpur, Haripur

Mr. Umair Matloob

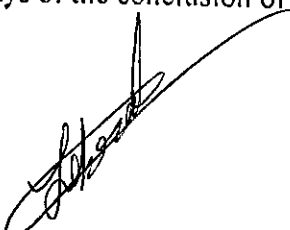

Umair Matloob

Enclsd:

1. A copy of Statement of Allegations is forwarded for information and necessary action to the convener Enquiry Committee Mr. Tahir Naseem. The inquiry may be conducted day to day basis without interruption and your findings and grounds thereof be submitted to the authorized officer within 10 days of the conclusion of the proceedings.


Principal

GDC Khanpur, Haripur


PRINCIPAL
Govt. Degree College
Khanpur (Haripur)

ARJ

حضرت بنان بنوریؒ کے بارے میں جاننے والے بنو زعفران کو ()
جناب عالی

28

مؤرخانہ گزارش میں مذکور محمد مطلوب بحیثیت پیشہ کام کرنا ہوں
 گزارش دیکھ کر سائل نے بااثر ملک جانے کیلئے کچھ پیسے کسی بندہ کے پاس جمع کروائے۔ اس
 بندہ کو کچھ رقم اور زمین ملے۔ وہ کچھ پیسے سے مقصد حاصل کر کے اپنے گھر سے نکلے۔
 رقم جانے پر اور وہ کچھ پیسے لے کر اپنے گھر سے نکلے۔ اور اس کے ساتھ اپنے گھر سے نکلے۔
 پریشان کیا گیا تھا۔ اس پریشان کے جمع سے کچھ دن کا کالج میں حاضر نہ ہو سکا۔ اور وہ
 بندہ میرے پیسے لے کر گیا۔ بند سے پیسے نکلوانے کا مقصد یہ تھا کہ چند دن تک
 بعد ہمیں ہمارے پلاٹ کی رقم ملنے لگی تھی تاکہ وہ ہم اگادٹ میں جمع کروا دیں گے۔ پھر وہ
 کچھ پلاٹ کی رقم ملنے سے وہ پیسے جمع کروا دیے۔ اور جنگ میں نے اس طرح نکالے
 کہ جب پریشان صاحب کے پاس جاتا تو ان کے پاس کچھ پیسے اور کچھ نوٹس بھی تھے۔
 میں جاتے ہوئے چیک نکال لیتا تھا۔ اور اس پر وہ سلیپ میں نہ ہیں میرا گھر
 والے اور نہ ہی کالج کا کوئی بندہ ملوث ہے۔

سائل اس سارا معاملے سے بہت زیادہ شرمندہ ہے۔ اور سائل پریشان صاحب
 سے معافی چاہتا ہے اور آئندہ وعدہ کرتا ہوں کہ اس کو کئی کام میں نہ لگائے گا
 سائل کو ایک ترمیم معافی کا موقع دے دیں۔

سائل تاثر دے گا گورنر کا
 رعاوض

سائل محمد مطلوب پیشہ گو رفت کالج خانپور

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 Fattah
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(Annex V)

سوالنامہ

1- اپنی پرنسپل صاحب سے چیک سائن کرانے آپ لے کر جاتے تھے؟ (۷۰)

2- یہ چیک نبیا الرحمن لکھ کر دیتا تھا؟ (جواری) کیسے لکھتے تھے جیولرس یا ۱۱۱۱۱۱؟ (۷۰)

3- چیک سائن کروانے کے بعد چیک بک سے چیک آپ علیحدہ کرتے تھے یا کلرک؟
لکھی، کلرک صاحبہ اور لکھی صاحبہ سے علیحدہ کرتا تھا۔

4- جس الماری میں چیک بک رکھی ہوتی تھی اسے تال لگا ہوتا تھا یا نہیں؟

تال لگا ہوتا تھا۔ (صناد کے آنے سے پہلے تال لگا ہوتا تھا۔)
صناد کے آنے کے بعد الماری کھلی رہتی تھی۔

5- الماری کی چابیاں کس کے پاس ہوتی تھیں؟
الماری کی چابیاں دراز صاحبہ ہوتی تھیں۔

6- DDO اپنی پرنسپل نے بھی آپ سے یہ کہا کہ آپ چیک کیوں لائے ہیں؟
لکھی اعتراض نہیں کیا۔

7- آپ نے بھی پرنسپل یا کسی ٹاف ممبر کا ذاتی چیک بھی کیش کروایا ہے؟ Yes

8- آپ نے چیک بک سے چیک ایک ہی بار نکالے؟

مہینہ دو دنوں میں چیک نکالے۔

9- آپ نے چیک بک الماری سے نکال کر چیک نکالے؟
لکھی چند تقریباً 7 یا 8 الماری سے صناد سے آنے سے پہلے نکالے اور باغیچہ پر چیک
دھریا اوقات سے دوران الماری سے ہی نکالے۔

10- کیا آپ نے پرنسپل سے دستخط کروانے کے بعد کلرک کو چیک بک واپس کرنے کے دوران چیکس نکالے؟ No

11- کتنے چیک الماری سے اور کتنے چیکس پرنسپل آفس اور کلرک آفس کے درمیان آتے جاتے نکالے؟

سارے الماری سے ہی نکالے۔

12- اپنی بینک سے چیک کیش کرانے کی ذمہ داری کس نے رکھی؟

میرزا محمد خان سہیل نے چیک اور دستخط کرانے میں اپنی ذمہ داری ادا کی تھی۔

13- آپ رقم نکھوا کر کس کے پاس رکھتے تھے؟ (پوری شدہ)

میرزا محمد خان سہیل نے رقم نکھوائی تھی۔ (Hina) کو اپنی پیسہ کرتا تھا۔

حنا بہادر لیپور کی رہائشی ہے۔

14- آپ پاکستان سے باہر کس ملک جانا چاہتے تھے؟

Behrain

15- آپ اپنی ایجنٹ کے ساتھ کتنی رقم کی بات طے ہوئی تھی؟

لکھنؤ 1650000/- بحاس بنار

16- کتنی رقم نکھوانے سے پہلے کتنی رقم آپ ایجنٹ کو دے چکے تھے؟

Rs = 1700000/-

17- وہ رقم کہاں سے حاصل کی تھی؟

ذاتی اکاؤنٹ سے ادائیگی۔

18- آپ کا پلاٹ کب فروخت ہوا؟

بیسارہ مبلغ 7 لاکھ اکتوبر

19- جو چیک پوری کئے، ان پر رقم اور دوسری تفصیلات خود لکھتے تھے یا کسی اور سے لکھواتے تھے؟

میرزا محمد خان سہیل نے خود لکھا اور کچھ بینک میں موجود خالیوں میں سے لکھواتا تھا۔

آخری دو چیک میں نے خود لکھے۔

20- چیک کیش کرتے وقت بینک عملہ نے کبھی اعتراض نہیں اٹھایا؟

کبھی نہیں لگا۔

21- ایجنٹ کے خلاف آپ نے FIR کھوائی؟

خالد علی کادوانی ایجنٹ کے خلاف میرے چچا شوکت محمود نے

جو کہ اسلام آباد پولیس میں ASI ہیں کی ہے۔

22- پرنسپل کی سٹیپ (جہ) آپ کیسے استعمال کرتے تھے؟

نہا سٹیپ میں آٹھ لاکھ میں لکھی پٹری ہوتی تھی۔ پرنسپل کی سٹیپ

جب بھی موقع ملتا میں لگا لیتا تھا۔

(Annex-I)

محترم جناب پرنسپل صاحب گورنمنٹ ڈگری کالج خان پور

جناب عالی!

مؤدبانہ گزارش ہے کہ میں فدوی عمیر مطلوب بھنڈت
 اپنی کامیابیوں اور گزارش ہنگامہ سائل نے باہر ملک جانے کے لیے کئی
 ہیٹ ایس بندے کے پاس جمع کروائے اور باقی سب سوچا کہ ہمارا پلاٹ بکنے
 والا ہے تب ادا کرونگا لیکن مقررہ وقت تک پلاٹ نہ بک سکا اور
 بقیم رقم ادا کرنے کیلئے میں نے کالج کے اکاؤنٹ سے نکلوانے اور اس
 بندے کو دیے جس نے مجھے سب تنگ کر دیا تھا۔ بینک سے سب نکلوانے
 کا مقصد یہی تھا کہ چند دن بعد پلاٹ کے سب ملنے پر ساری رقم
 بینک میں واپس جمع کروا دوں گا۔ میرا ارادہ کالج کو دھوکہ دینا نہیں
 بلکہ سب مجبوری اور پریشانی کے تحت مجھ سے غلط قدم اٹھ گیا
 وہ بندہ جس نے سب کے لیے کمر ہیا گیا میں اسکو ڈھونڈنے کیلئے تیار
 ہوں۔ سب کے مطابق لاہور بھی گیا مگر وہ سب فریب نکلا اور میں پریشانی
 اور شہدہ ہوئی۔ اسے تحت میں کچھ دن گئے اور کالج سے غنیمت حاضر رہا۔ میں
 نے کالج کے اکاؤنٹ سے جتنے سب نکلوانے سب لوٹا دیے۔ میں اپنی
 غلطی پر بہت شرمندہ ہوں اور اس پورے سلسلے میں نہیں مہم
 ہوں۔ اس لیے کالج کو کوئی بندہ ملوٹ ہے۔

سائل نے اس سارے معاملے سے بہت زیادہ شرمندہ ہے اور یہ وہ
 ہے کہ اگر شہدہ بھی وہ سب ایسی شہادت نہیں ہوئی۔ آپ سے
 مؤدبانہ گزارش ہے کہ سائل کو نیک و ستم معافی مانگو اور اسے
 سائل دعاؤں سے ہے گا

العارضی

عمیر مطلوب

Date - 23-01-2023

علی محمد
 23/01/23

M
Ann-M
OFFICE OF THE PRINCIPAL, GOVT. DEGREE COLLEGE, KHANPUR (HARIPUR) (Annex-XIII)

049/23

Dated 28 01 2023

1. Atta Ullah Jan, Principal Government Degree College Khanpur, Haripur, as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 hereby serve you, Mr. Umair Matloob, Bahashiti (BS-03), Govt. Degree College Khanpur, Haripur as follows:

- i. That consequent upon the completion of inquiry conducted against you by Inquiry Committee comprising of Mr. Tahir Naseem, (BS-19), Associate Professor of mathematics, Govt. Degree College Khanpur, Haripur, and Mr. Tariq Naveed Quershi, (BS-19), Associate Professor of Physics, Govt. Degree College Khanpur, Haripur, for you were given opportunity of hearing.
- ii. Pending, through the findings and recommendations of the Inquiry Committee, the material on record and other connected papers including your confessional statement before the Inquiry Committee.

I am satisfied that you have committed the following acts/omissions specified in rule 3 of the said rules:

- a) Guilty of misconduct within the meaning of rules 2(1) and 3(b) of the Government Servants (Efficiency and Discipline) Rules, 2011 for the said commission/omission on your part; and
- b) Corrupt or may reasonably be considered as corrupt within the meaning of rule 3(c) of the Government servants (Efficiency and Discipline) Rules, 2011

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of Removal from service under rule 4 of the said rules.
3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
4. If no reply to this notice is received within 07 days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.
5. A copy of the findings of the Inquiry Committee is enclosed.

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matloob
00900
28/01/23
11-36-23
Mr. Umair Matloob, Bahashiti (BS-03)
GDC Khanpur, Haripur

Principal
Govt. Degree College,
Khanpur, Haripur.
PRINCIPAL
Govt. Degree College
Khanpur (Haripur)

M

ANX-M

جناب پرنسپل صاحب گورنمنٹ ڈگری کالج خانپور

جناب عالی!

مؤدبانہ التماس ہے کہ سائل پرنسپل صاحب کو ذاتی حیثیت سے ملنا چاہتا ہے۔

لہذا مہربانی فرما کر سائل کو ذاتی طور پر ملنے کے لئے ٹائم دیا جائے۔

العارض

سائل عمیر مطلوب

گورنمنٹ ڈگری کالج خانپور

سورہ 01-02-2022

Samiullah Shah
(ASST)

issue letter to
Mr. Umair Malloob for personal hearing.

9/11/2023
02/02/2023

(ANX-M III)



OFFICE OF THE PRINCIPAL
GOVT: DEGREE COLLEGE,
TARNAWA KHANPUR, (HARIPUR).

Telephone #: 0995-354151
email: hr4110gdcckhanpur@gmail.com



Ann-O

No. 065-68 / 23

Dated: 06 / 02 / 2023

NOTIFICATION:

No. 23/23, dated January 10, 2023, Mr. Umair Matloob, Bahashiti (BS-03) in Govt: Degree College Khanpur, Haripur was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & discipline) Rules, 2011, for the charges mentioned in the charge sheet and Statement of Allegations.

AND WHEREAS, the Competent Authority appointed Mr. Tariq Naveed Quershi, Associate Professor of Physics (BPS-19), Mr. Sami Ullah Shah, Assistant (BPS-16), Government Degree College Khanpur Haripur as Fact-Finding Committee to sort out the facts and submit the report on January 7, 2023. After proposed further investigation against the accused.

2. AND WHEREAS, the Competent Authority appointed Mr. Tahir Naseem, Associate Professor Maths (BPS-19), Mr. Tariq Naveed Quershi, Associate Professor of Physics (BPS-19), and Mr. Sajawal Khan Assistant Professor of English (BPS-18), Government Degree College Khanpur, Haripur as Inquiry Committee to conduct inquiry against the accused for the charges leveled against him in accordance with the Law/Rules.

3. AND WHEREAS, the Inquiry Committee after having examined charges, evidence on record and explanation of the accused, submitted its report on January 25, 2023.

4. AND WHEREAS, the Competent Authority has served the accused with the Show Cause Notice for "Removal from Service".

5. NOW THEREFORE, The Competent Authority, After having considered the charges, evidence on record, findings of the inquiry report, the explanation of the accused after affording him personal hearing, and in exercise of powers under Rule 14(7) of the Khyber Pakhtunkhwa Government Servants (Efficiency & discipline) Rules, 2011, has been pleased to confirm the major penalty of "Removal from Service" with February 6, 2023 upon the accused.

PRINCIPAL,
GOVT: DEGREE COLLEGE,
KHANPUR (HARIPUR).

Copy forwarded to the:

1. Director, Higher Education Department, Khyber Pakhtunkhwa, Peshawar
2. District Account Officer, Haripur.
3. Regional Director, Higher Education department, Hazara Division, Abbottabad.
4. Mr. Umair Matloob, Bahashiti (BS-03), GDC Khanpur, Haripur.

PRINCIPAL,
GOVT: DEGREE COLLEGE,
KHANPUR (HARIPUR).