

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR.

Appeal No.1632/2023

Samia Begum..... Appellant.

Versus

District education officer (F) district Khyber & Others... Respondents.

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Samina Ghani (DEO) - F  
Khyber

*Samina Ghani*

Dated \_\_\_\_\_ / \_\_\_\_\_ /2023

*16-1-2024  
Peshawar*

**BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR.**

**Appeal No.1632/2023**

**Samia Begum..... Appellant.**

**Versus**

**District education officer (F) district Khyber & Others... Respondents.**

**Comments on behalf of Respondents No.1, 2 & 3.**

**Preliminary objections.**

Page No. 10452

Date: 09-1-2024

- That the appellant has got no cause of action locos standi to file the instant appeal.
- That the appellant has not come to this honorable tribunal with clean hands.
- That appellant concealed material facts from this honorable tribunal.
- That the appellant is estopped by her own to bring the present appeal
- That the appellant is bad due to mis-joinder and non-joinder of necessary parties
- That the appeal is barred by law and limitation.

**Respectfully Sheweth; That the respondent submit as under;**

**ON FACTS.**

01. Incorrect denied. All of the teachers of the affected area schools were redeployed to other nearby schools under the proposal of assistant district education officer, and they carried out their duties. Meanwhile, the appellant was reported by the concerned officer that she has been absent and no attendance records was available in concerned school GGPS Turkistan BZK landi kotal and GGPS zulafiqar kalli Landi kotal district Khyber.

02. Incorrect, hence denied The DEO Khyber had come to know through the ADEO by checking the master pay roll that the appellant Mrs. Samia Begum D/O Muhammad rafique Ex-T.T P.No.50162005 was drawing pay as primary school teacher from district account office Khyber, then her pay was stopped and her name and personal number also reflected in two leading newspaper "Daily Mashriq"& Daily Express dated 27/05/2017. Copies are attached as Annexure-A & B. It reveals that the concerned so called teacher was directly inducted into the system, copy attached as Annexure-C & D.

03. Incorrect. Hence denied. All the ghosts' employees were informed through newspapers to reach the DEO (AEO) themselves for physical verification however, the appellant neither approach to office nor verified herself till today and as a result the appellant salary was stopped.

04. Incorrect denied. Despite being inducted herself fraudulently and illegally, received salary through dubious means, and never performed her duties, the appellant has the right to appeal; nevertheless, she didn't file a departmental appeal or confirmed her service record. Rather, she caused a great loss to the government exchequer.

05. Incorrect, hence denied. Proper opportunity was given but she failed to prove herself legally and rightly.

**Grounds.**

A. Incorrect. Hence denied. The respondent department has treated the appellant in accordance with laws and rules. The appellant was being fraudulently inducted into the Education Department.

B. Incorrect hence denied. As elucidated in para 2 above facts.

C. Incorrect hence denied. The appellant was informed through various means that is daily newspaper Mashriq and Express. Thereafter, having no contact with concerned department so her salary was stopped in 2017. She did not bother to clarify her stance regarding the actions taken by competent authority directly or through the counsel. It is very much clear that her induction was made by unfair means. It is obvious from her belated appeal that her case already time barred and hence not entertainable.

D. Subject to record. As already elucidated in para 1 above facts.

E. Incorrect hence denied. As elucidated above that the appellant could not prove herself innocent because She was fraudulently induced in SPA system and thus she was guilty of misconduct and violation of rules.

F. Incorrect. Hence denied. The appellant neither filed the department appeal nor performed her duty.

G. Incorrect hence denied. As elucidated in para 1 above facts.

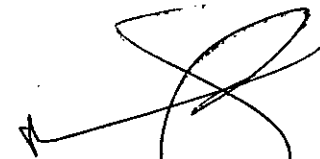
H. Subject to proof

Respondents department also seeks permission of this Honorable Tribunal to advance other grounds at the time of hearing the case.


**Pray:**

In light of the above stated facts it is submitted, that the case of the appellant may be ordered as dismissed with cost.


**Respondent No. 1**

  
**(MOHTASIM BILLAH)**  
Secretary of E&SE  
Khyber Pakhtunkhwa

**Respondent No.2**

  
**(SAMINA ILTAF)**  
Director of E&SE  
Khyber Pakhtunkhwa

**Respondent No. 3**

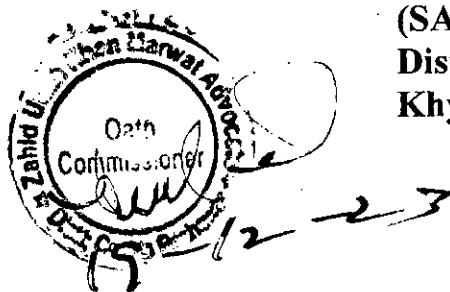
  
**(SAMINA GHANI)**  
District Education Officer (F)  
Khyber at Jamrud

**AFFIDAVIT**

I, Samina Ghani District education Officer Khyber do hereby solemnly affirm and declare that the contents of the accompanying better para-wise comments submitted by the respondents is correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.



**(SAMINA GHANI)**  
District Education Officer (F)  
Khyber at Jamrud



**BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR.**

**Appeal No.1632/2023**

**Samia Begum..... Appellant.**

**Versus**

**District Education Officer (F) District Khyber & Others... Respondents.**

**Para-wise Comments on behalf of Respondents No. 01 to 03.**

**AFFIDAVIT**

I, Samina Ghani District education Officer Khyber do hereby solemnly affirm and declare that the contents of the accompanying better para-wise comments submitted by the respondents is correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

**(SAMINA GHANI)  
District Education Officer (F)  
Khyber at Jamrud**

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR.

P-5

Appeal No.1633/2023

Safia..... Appellant.

Versus

District education officer (F) district Khyber & Others.... Respondents.

**Authority Letter**

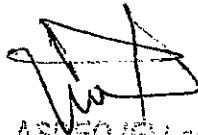
Mr.Munawar Khan /focal Person of (Litigation) District education Officer Khyber is hereby authorized to submit para-wise comments in the court on the behalf of respondent.

Samina Ghani  
District education Officer (F)  
Khyber at Jamrud  
18/11/2023

Certificate:      Annex A      6

It is certified that there has not been any teacher on the name of Mst: Safia and Samia in GIBPS Zulfigar kili Landikotal Kam. Ghulam.

Submitted please



ASDEO (F) Landikotal  
District Khyber At Jamrud

16/11/2023

Attended  


Handwritten notes in Urdu at the bottom of the page, including dates like 2015, 16, 17 and a reference number: 2120-3-3400374-9


# Certificate:


ANXA, 7

It is certified that there has not been any teacher namely Mst. Safia and Samia in GGPS Turkistan Landikotal,

However, Mst. Farzana worked there in 2009 as Govt teacher, but due to Law & order situation and militancy in the area, she also left the school in <sup>year</sup> 2010, since then no regular teacher has been posted there

Submitted 

  
ASDEO (F) Landikotal  
District Khyber A.P. Jaisalmer  
16/11/2023

Attested  




# روزنامہ آج 5 اپریل 2017

قائد روٹے کو آگ، کیا کیا عمر انہوں نے جو اسٹیشن حکومت اور پورے ملک میں

**دریائے گمبھاییل پر کھڈے** حکمہ تعلیم خیر کے 101 گھوسٹ لہکاروں کی تجویزیں بند

**پڑ گئے ٹریک حادثات معمول** سرانے ٹورنگ کے لاکھوں آج کامیابی منگاتے اور لاہور ایس کے اے کے لاکھوں آج کے پورے دریا کے گمبھاییل پر کھڈے ٹریک حادثات میں اضافہ ہو چکا ہے۔ حکومت اور ارباب اختیار سے پروردگار کا کہنا ہے کہ یہی کی تیرا مرمت کیے جانے اور حادثات اٹھائے جائیں۔

جہود (مناصفہ آج) حکمہ تعلیم خیر نے ایک سو ایک گھوسٹ لہکاروں کی تجویزیں بند کیں اور آفیسروں کو برٹے میڈیا کو گھوسٹ لہکاروں میں دو چکر لہکاروں کا کارہ 97 عمل امراتہ شامل ہیں جو کہ حکمہ تعلیم خیر سے باقاعدہ درخواستیں لے رہے تھے۔ گران گھوسٹ لہکاروں کا حکمہ تعلیم خیر کے عمل فرمیں جیادہ شرحہ ہار شامل ہے۔

گہری تلاش کے 70 تار

# روزنامہ اوصاف

مسیحی اہل حق کے ہرگز حیل بکری میں ہاتھ نہیں لی لی ان سے سستی ہر حال کو اپنی ذمہ داری ہے ہیں

**حکمہ تعلیم میں غفلت برداشت نہیں کی جائیگی، جردن وزیر**

حکمہ تعلیم خیر کے 101 گھوسٹ لہکاروں کی تجویزیں بند

تعمیر (مناصفہ اوصاف) ایچ ایچ ایچ کے آفیسروں نے کہا کہ گھوسٹ لہکاروں میں دو چکر لہکاروں کا کارہ 97 عمل امراتہ شامل (باقی صفحہ 24 پر 20)

مردانہ، حکمہ صحت کے افسروں کا ملازمہ

*Handwritten signature or note in Urdu script.*

حکمہ تعلیم خیر کے 101 گھوسٹ لہکاروں کی تجویزیں بند

تعمیر (مناصفہ اوصاف) ایچ ایچ ایچ کے آفیسروں نے کہا کہ گھوسٹ لہکاروں میں دو چکر لہکاروں کا کارہ 97 عمل امراتہ شامل (باقی صفحہ 24 پر 20)

مردانہ، حکمہ صحت کے افسروں کا ملازمہ







Agency Education Office  
Khyber Agency at Jamrud

12  
116 P-11  
Auzc

No. \_\_\_\_\_ Dated: \_\_\_\_\_/\_\_\_\_\_/2017

LIST OF THE OFFICIAL MISSING FROM THEIR DUTIES AND THE AGENCY EDUCATION OFFICER  
KHYBER AGENCY AT JAMRUD HAS STOPPED THEIR SALARIES AND DISCIPLINARY ACTION UNDER

E&D RULES HAS BEEN INITIATED

S.No	Personal#	Name	Design:	S.No	Personal#	Name	Design:
1	414825	Sana Bibi	TT	51	50161615	nazia Shabbir	TT
2	412630	Fouzia	PST	52	423512	Nishad Shaheen	PTC
3	423514	Shakeela Begum	PST	53	572881	Nudrat begam	PTC
4	436337	Yasmin Bibi	TT	54	422964	Rabia Aziz	PTC
5	423462	Naseem Begum	PST	55	50187098	Rahat Begam	PTC
6	423543	Bibi Zahab	TT	56	413787	Rashida Bibi	PTC
7	511421	Gul Afsha	TT	57	423454	Rubina Kalsoom	PTC
8	423536	Asma	PST	58	414830	Saba	PTC
9	50189537	Zakira	PST	59	423589	Sadia Haroon	TT
10	50190854	Belqees	PST	60	409608	Safia-Sabir	PTC
11	413771	Nosheen	PST	61	423086	Saima Akhter	PTC
12	50171842	Naveed Shazad	PST	62	414826	Saira Azam	TT
13	423462	Salma Shaheen	PST	63	413810	Saira Bano	PTC
14	423474	Shaheen Akhtar	PST	64	50203770	Salma Noreen	PTC
15	414782	Faheema	PST	65	50183005	Samina Begam	PTC
16	524096	Roayya Bibi	TT	66	423091	Samra Ruhi	CT
17	412353	Bakht Meena	TT	67	422978	Seema	PTC
18	413784	Musarart	PST	68	422721	Shabnam Shah Nawaz	CT
19	414031	Sonia Bhatti	PST	69	414865	Shafat Begam	PTC
20	521855	Humera Bibi	TT	70	428268	Shaheen Firdus	PTC
21	445226	Zakia Saleem	PST	71	423502	Shakera Bano	TT
22	50189536	Habiba	PST	72	422979	Shazia Ambreen	PTC
23	50183006	Nargis	PST	73	50174975	Shazia Yasmeen	AT
24	428267	Naveeda Akhtar	PST	74	493644	Sofia Ambreen	PTC
25	50193142	Aqsa	PST	75	530326	Sonia Begam	PTC
26	450671	Kalsoom Begum	PST	76	589560	Tamana Naz	PTC
27	412706	Saira Bano	PST	77	50204603	Tamanna Naz	PTC
28	423480	Salma Afridi	PST	78	423212	Ujala Azam	PTC
29	423570	Shaheen	PST	79	409052	Zahida Begam	PTC
30	50161611	Mehwish Ashraf	PST	80	410281	Abida Waqar	PTC
31	507422	Noreen Afridi	PST	81	50150046	Arifa Naz	PTC
32	423495	Qismat Ara	PST	82	414913	Asia Begam	TT
33	423091	Saima Roohi	CT	83	415435	Asia Perveen	PTC
34	50181568	Haseeba	PTC	84	423539	Asmat Bibi	PTC

03149918740  
11/11/16

2/1/20

AGENCY EDUCATION OFFICER

Personal#	Name	Design:	S.No	Personal#	Name	Design:
35 410028	Humaira Gul <i>working</i>	DM	85	409911	Aysha Azam	PTC
36 412627	Humaira Gul <i>working</i>	PTC	86	414822	Farzana	PTC
37 440038	Maria <i>working</i>	PTC	87	413778	Fatima <i>working</i>	PTC
38 428284	Maria	PTC	88	416280	Gushan Ara	PET
39 422958	Maryam Ayaz	PTC	89	451788	Hamida BiBi <i>working</i>	PTC
40 <del>50161611</del>	<del>Mehwish Ashraf</del>	PTC	90	428412	Muzammil Shah	PTC
41 50150036	Najma	PTC	91	423163	Nabila <i>working</i>	PTC
42 <del>414031</del>	<del>Saima Bhatti(PST)</del>	PST	92	410359	Iram Naz PST	PST
43 414670	Wahab Ali(Chow)	CHOW	93	423511	Gul Bibi(PST)	PST
44 413178	Gulshan(caller)	CALLER	94	414680	Naghma Naqvi	PST
45 424203	Asia Parveen(TT) <i>working</i>	TT	95	50174991	Zeenat (PST)	PST
46 423077	Zartaja(PST) <i>working</i>	PST	96	446076	Taj Mehreen	CT
47 416103	BIBI HAMIDA	CT	97	410740	Badana Begum	AT
48 423590	SHAMIM <i>Retired</i>	TT	98	423449	Nasreen Gul	TT
49 412375	Rashid	Chow	99	413446	Ayesha	PST
50 423494	Salma Gul Bahar	PST	100	414687	Alia Begum	AT
			101	414804	Azra Shaheen	PST

AGENCY EDUCATION OFFICER  
KHYBER AGENCY AT JAMRUD

Indst No. 1698-1708 Dated 20/03/2017

Copy forwarded to the for information please:

- 1 Director of Education FATA Peshawar
- 2 Political Agent Khyber Agency at Peshawar.
- 3 AAEOs Female concerned.
- 4 Superintendant local office
- 5 Office copy

AGENCY EDUCATION OFFICER  
KHYBER AGENCY AT JAMRUD



Agency Education Office

Khyber Agency at Jamrud

Phone. 091-5820584 Fax 091-5820584

No. 3451 Dated 13 /11/2017.

R-13

To:

The Director of Education,  
(FATA) Secretariat Peshawar.

Subject:- GUIDANCE / PROVISION OF INFORMATION.

Reference: this Office Endst No. 2151-60 and No. 2162-71 dated 12/10/2017 on the subject cited above.

It is to bring in to your information that following teachers were called through print media to attend office of the undersigned about their schools duty, but they failed to report till fixed date 21/09/2017.

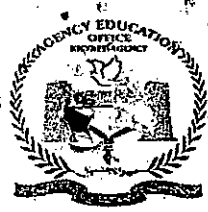
Then submitted the attached list to Agency Accounts Office vide this Office letter No.2161 dated 12/10/2017 for provision of source and attachments of each ghost employee. But did not provide information till date.

Therefore your are requested to guide the undersign for further codal formalities

AGENCY EDUCATION OFFICER  
KHYBER AGENCY AT JAMRUD

OK

Attended  
11/11/2017



**Agency Education Office**  
**Khyber Agency at Jamrud**

Phone. 091-5820265 Fax 091-5820265

Handwritten initials and numbers: "B", "37", "14", and "D".

**Notification**

Consequent upon the recommendation of enquiry committee Mst: Samina Begum fake PST (P/No.50183005 and Bank account No.0001060507 UBL Umarzai ) is hereby struck off from the Education roll Khyber Agency with immediate effect in the best interest of public service.

The monthly salaries drawn by the above named fake PST is hereby reported to the concerned political/District administration for early recovery which will be deposited into the Govt: treasury on Challan.

(MUHAMMAD JADOON KHAN)  
AGENCY EDUCATION OFFICER  
KHYBER AGENCY AT JAMRUD

7/09  
Endst:No:8009-17/Struck Off/Notification Dated:28/11/2017

Copy of the above is forwarded to:

1. Director Education FATA at Peshawar.
2. Political Agent Khyber at Peshawar.
3. Deputy Commissioner District Charsada: for recovery traceable from her bank detail mentioned above
4. AGPR Sub Office Peshawar.
5. PS to Additional Chief Secretary FATA
6. PS to Secretary SSD FATA.
7. Agency Accounts Officer Khyber with the request to stop payment of monthly salaries to the above named fake employee.
8. Branch Manager UBL Umarzai ): to freeze account of the above named fake employee immediately till the recovery of irregular drawl and to provide the address of the account holder.
9. Superintendent Local Office.

AGENCY EDUCATION OFFICER  
KHYBER AGENCY AT JAMRUD

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