

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No: 388 -P /2023

**SCANNED**  
KPST  
Peshawar

Nighat Seema

(Appellant)

**VERSUS**

Government of KPK, through Secretary Elementary & Secondary  
Education KPK & Others

(Respondents)

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*Nighat Seema*  
**Appellant: Mst Nighat Seema**  
Through

*Muhammad Irshad Mohmand*  
**Muhammad Irshad Mohmand**  
Advocate High Court

*Farhan Sheikh*  
& Farhan Sheikh  
Advocate

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No: 388 -P /2023

Nighat Seema (Ex Arabic Teacher) D/o Raz Muhammad R/o Noor  
Bahar Colony No 1 Tehsil & District Charsadda **(Appellant)**

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Secretary  
Elementary & Secondary Education KPK, Peshawar
2. Director, Elementary & Secondary Education Khyber  
Pakhtunkhwa Peshawar
3. District Education Officer (Female) District Charsadda
4. District Education Officer (Female) District Battagram

**(Respondents)**

SERVICE APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974,  
AGAINST THE IMPUGNED OFFICE ORDER NO  
12025-30 DATED 16-06-2022 WHEREBY THE  
INITIAL IMPUGNED OFFICE ORDER NO.10643  
DATED 22/11/2017 PASSED BY THE DEO  
(FEMALE) CHARSADDA HAS BEEN KEPT  
MAINTAINED, AND THE SERVICE OF THE  
APPELLANT HAS BEEN DISPENSED BEING NO  
MORE REMAINED TEACHER AND THE  
DEPARTMENTAL APPEAL OF THE APPELLANT  
HAS NOT BEEN RESPONDED WITHIN THE  
STIPULATED PERIOD.

**Prayer:-**

On acceptance of this Service Appeal, both the impugned Office Order No 12025-30 dated 16-06-2022 & initial impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda whereby the service of the appellant has been dispensed may kindly be set aside and the Appellant be re-instated to her service with all back benefits.

*Any other remedy which this august tribunal deems appropriate may also be granted to the appellant.*

**Respectfully Sheweth:-**

The brief facts leading up to the filing of this appeal are as under:-

1. That the Appellant was initially appointed in BPS-9 as Arabic Teacher (AT) vide appointment order dated 01/09/2009 by the competent authority after adopting all the codal & legal formalities and then posted at Government Girls Middle School Gidri Khairabad District Batagram. **(Copy of Appointment Order is attach as Annex "A")**
2. That the appellant was performing her duty with great zeal & zest and no complaint whatsoever was made against the appellant and in the year 2012 the appellant was transferred from District Batagram to District Charsadda by the Respondent No 2 / Director E & SE KPK Peshawar vide transfer Order dated 16/11/2012, and posted at Government Girls Middle School Amir Abad Dakki District Charsadda duly issued LPC and thereafter the Respondent No 3 / DEO Charsadda issued further transfer order vide, dated 4-12-2012 whereby the appellant was posted as Arabic Teacher at Government Girls High School Dadu Kalay District Charsadda **(Copy of Transfer orders dated 16-11-2012 , LPC & transfer order dated 04-12-2012 are attach as Annex "B")**

3. That thereafter the service documents, service record and educational record of the appellant were duly verified vide letter No 7519 dated 09-01-2013 & letter No 270 dated 18-01-2013 by the Respondent No.3 & 4 from the quarter concerned as evident from the letters and duly issued letter No 700 dated 18-03-2013 for the release of appellant pay and thereafter the appellant was performing her duty with great zeal & zest up to the entire satisfaction of her high ups.**(Copy of verification letters & letter for released of Pay and Pay slip are attach as Annex "C")**
  
4. That the Respondent No.3 / DEO Female Charsadda without issuance of charge sheet & statement of allegation and without conducting any departmental inquiry straightaway issued the impugned office order dated 22/11/2017 whereby service of the appellant was dispensed. **(Copy of initial impugned office order dated 22/11/2017 is attach as Annex "D")**
  
5. That the appellant filed departmental appeal against the impugned order dated 22-11-2017 before the Respondent No.1 / Secretary E & SE KPK Peshawar which was not respondent, therefore the appellant filed Service appeal No 1380 / 2019 which was allowed vide order dated 11-11-2021 by setting aside the impugned order and the case was remanded to the Respondents for regular and detail inquiry within 90 days **(Copy of Service Appeal & judgment / order dated 11-11-2021 passed by this Honorable Tribunal is attach as Annex "E")**
  
6. That the Respondent were not implementing the judgment / order of this Honorable Tribunal, therefore the appellant filed implementation application before this Honorable Tribunal.**(Copy of execution filed for implementation is attach as Annex "F")**

7. That during the pendency of execution petition, the Respondent No 3 submitted the alleged inquiry report just to absolved herself from the direction of this Honorable Tribunal by preparing the alleged inquiry report and without conducting any detail inquiry as order by this Honorable Tribunal, the DEO (Female) Charsadda again passed the impugned Office Order No 12025-30 dated 16-06-2022 whereby the initial order dated 22-11-2017 has been kept maintained by dispensing the service of appellant but the same was not conveyed & received to the appellant, and it is pertinent to mentioned here that the alleged inquiry was submitted by the Respondents in the execution proceeding on 17-10-2022 before this Honorable Tribunal , wherefrom the appellant has got the knowledge of the alleged impugned office order dated 16-06-2022 and this Honorable Tribunal disposed-off the execution petition of the appellant vide order dated 04-11-2022. **(Copy of alleged Inquiry report & impugned office order dated 16-06-2022 & execution disposed-off order dated 04-11-2022 are attach as Annex "G")**
8. That the appellant then filed departmental appeal against the impugned Office Order No 12025-30 dated 16-06-2022, before the Respondent No 2 / Director Education KPK Peshawar but the same has not been responded within the statutory period. **(Copy of Departmental Appeal is attach as Annex "H")**
9. That the appellant being aggrieved from the impugned service dispensing Order No 12025-30 dated 16-06-2022 & impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda and by not responding the departmental appeal within the stipulated period prefer the instant service appeal before this Honorable Tribunal on the following Grounds:-

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GROUNDS

- A. That both the impugned office order No 12025-30 dated 16-06-2022 & initial impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda are totally illegal, against E&D Rules 2011, justice and facts of the case therefore not tenable.
- B. That according to the Direction of this Honorable Service Tribunal no inquiry has been conducted, nor any show cause notice / charge sheet & statement of allegation has been issued to the Appellant, nor the Appellant was informed or associated in the alleged inquiry and no opportunity of hearing has been provided to the Appellant, therefore the impugned order has been passed on the back of the appellant and the initial order of DEO (Female) Charsadda has been endorsed without complying the direction of this Honorable Tribunal.
- C. That the alleged inquiry officer / committee has not called the appellant for inquiry proceeding and the alleged inquiry report was prepared just to absolved himself by the DEO (Female) Charsadda from the direction of this Honorable Tribunal, therefore both the impugned office orders are illegal and not according to law nor inconsonance with the fact of the case rather the same has been passed to show that the inquiry proceeding has been conducted in the light of the order of Honorable Tribunal.
- D. That the appellant has been appointed in the year 2009 and the DEO (Female) Charsadda has been awakened from deep slumber in the year 2017 by declaring the appointment order of the appellant to be fake, despite the fact that every year in the service book of the appellant, the service of the appellant has been verified by the competent authority, therefore the allegation of fake appointment of the appellant is baseless and based on mala fide.

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- E. That in the alleged inquiry, there is no assertion of the officer / competent authority of the relevant time who has denied the appointment order of the appellant nor the statement has been recorded of the officer, who had appointed the appellant by the inquiry officer to determine the genuineness or fakeness of the appointment order of the appellant.
- F. That the appellant has more than 10 year service on her credit and at this belated stage, it does not appeal to the prudent mind that the appointment order of the appellant is false or fraudulent and fake.
- G. That the alleged inquiry officer has not followed the E & D Rule 2011 in letter & spirit rather the same has been violated by submitting a frivolous inquiry report for dispensing the service of the appellant and the impugned order are liable to be struck down being not sustainable under the law.
- H. That the word dispensing is nowhere mentioned in the service law or E & D Rule 2011, therefore the impugned dispensing order as well as the alleged inquiry conducted by the so called inquiry officer are not true & correct in the light of the judgment & direction of this Honorable Tribunal, therefore both the impugned orders are liable to be set aside.
- I. That while dispensing the service of the appellant, no final show cause notice was issued to the appellant and the appellant has been kept un informed from the alleged inquiry and the alleged inquiry was filed in the execution proceeding on 17-10-2022 before this Honorable Tribunal, wherefrom the appellant has got the knowledge of the alleged inquiry & impugned order, and the execution petition was disposed-off on 04-11-2022.
- J. That any other ground will be raised at the time of final arguments with the permission of this Honorable Tribunal.

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**Prayer:-**

It is therefore most humbly requested that on acceptance of this Service appeal on behalf of appellant, the impugned service dispensing Order No 12025-30 dated 16-06-2022 & impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda as well as the inaction of the Respondents on the departmental appeal of the appellant be declared as illegal against the Service law & E & D Rule 2011 may graciously be set aside and the appellant be re-instated to her service with all back benefits.

*Nighat Seema*

**Appellant: Mst Nighat Seema**  
Through

*Muhammad Irshad Mohmand*

**Muhammad Irshad Mohmand**  
Advocate High Court

*Farhan Sheikh*

**& Farhan Sheikh**  
Advocate

Certificate:

As Per Instruction of my client, certified that no such like service appeal has earlier been filed by the appellant before this Honorable Tribunal

Advocate



(8)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No: -P /2023

Nighat Seema

(Appellant)

**VERSUS**

Government of KPK, through Secretary Elementary & Secondary  
Education KPK & Others (Respondents)

**AFFIDAVIT**

I Nighat Seema D/o Raz Muhammad R/o Noor Bahar Colony No 1  
Tehsil & District Charsadda , do hereby solemnly affirm and declare  
that all the contents of the accompanied service appeal are true and  
correct to the best of my knowledge and belief and nothing has been  
concealed or withheld from this Honorable Tribunal.

**DEPONENT**

*Nighat Seema*

**Identified by**

*Muhammad Irshad Mohmand*

Muhammad Irshad Mohmand  
Advocate High Court  
Peshawar



*23/2/23*

(9)

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

CM No -P/2023

In Service Appeal No: -P /2023

Nighat Seema

(Applicant)

**VERSUS**

Government of KPK, through Secretary Elementary & Secondary  
Education KPK & Others

(Respondents)

APPLICATION FOR SUSPENSION OF BOTH THE  
IMPUGNED OFFICE ORDER NO 12025-30 DATED  
16-06-2022 & INITIAL IMPUGNED OFFICE ORDER  
NO.10643 DATED 22/11/2017 PASSED BY THE  
DEO (FEMALE) CHARSADEA WHEREBY THE  
SERVICE OF THE APPELLANT HAS BEEN  
DISPENSED MAY KINDLY BE SUSPENDED AND  
THE APPELLANT BE ALLOWED TO PERFORM  
HER DUTY TILL THE FINAL DECISION /  
OUTCOME OF THE CASE

Respectfully Sheweth:-

1. That the above noted service appeal is being filed before this Honorable Tribunal in which no date of hearing has yet been fixed.
2. That the Respondents without issuance of show cause notice / charge sheet & statement of allegation and without following the lawful procedure as provided under the law & without conducting any detail inquiry as directed by this Honorable Tribunal issued the above mentioned impugned office orders whereby the applicant / appellant service has been dispensed, therefore the applicant has got a good prima facie case in her favour and balance of convenience also lies in favour of applicant and in sanguine of its success.

- 3. That while passing the impugned order by Respondent no show cause notice has been issued to the applicant and just for nothing the applicant / appellant has been penalized, therefore both the impugned orders be suspended and the appellant be allowed to perform her duty.
- 4. That if the impugned orders are not suspended the applicant / appellant will further suffer without any reason & lawful justification
- 5. That the facts and grounds of the appeal may kindly be read as an integral part of this application.

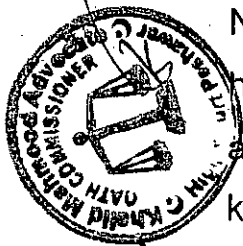
**Prayer**

It is therefore most respectfully prayed that on acceptance of this application, both the impugned Office order No 12025-30 dated 16-06-2022 & initial impugned Office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda whereby the service of the applicant / appellant has been dispensed may kindly be suspended and the applicant be allowed to performed her duty till the final decision / outcome of the case

*Night Seema*  
22/11/23

**AFFIDAVIT**

Night Seema (Ex Arabic Teacher) D/o Raz Muhammad R/o Noor Bahar Colony No 1 Tehsil & District Charsadda, do hereby solemnly affirm and declare that all the contents of the accompanied Application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal.



*Night Seema*  
**DEPONENT**

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No: -P /2023

Nighat Seema

(Appellant)

**VERSUS**

Government of KPK, through Secretary Elementary & Secondary  
Education KPK & Others.

(Respondents)

**ADDRESSES OF PARTIES**

Nighat Seema D/o Raz Muhammad R/o Noor Bahar Colony No  
1 Tehsil & District Charsadda


(Appellant)

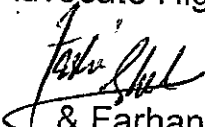
**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Secretary  
Elementary & Secondary Education KPK, Peshawar
2. Director Elementary & Secondary Education Khyber  
Pakhtunkhwa Peshawar
3. District Education Officer (Female) District Charsadda
4. District Education Officer (Female) District Battagram

(Respondents)

  
Appellant: Mst Nighat Seema  
Through

  
Muhammad Irshad Mohmand  
Advocate High Court

  
& Farhan Sheikh  
Advocate

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Annex A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E& SE) BATTAGRAM.

APPOINTMENT ORDER.

Consequent upon the approval of competent authority that Mst Nighat Seema D/O Raz Muhammad is hereby appointed as A.T in Govt Girls Middle School, Gidri Khair Abad Battagram in BPS -09 against vacant post plus usual allowances as admissible under the rule in the interest of public service with effect from the date of her taking over charge.

TERMS & CONDITIONS.

1. She will be governed by such rules & regulation as may be prescribed by the Govt. from time to time for category of the Govt. Servant to which he belong.
2. In case of resignation prior notice of one month should be given by the official concerned other wise one month pay /allowances will be forfeited in lieu thereof Her original Certificate/degrees should be checked and verified from the concerned BISE/University concerned etc before handing taking over charge by the DDO concerned through Agency Education Officer concerned.
3. She declaration of assets should be obtained and kept in safe custody by the DDO concerned.
4. She take over charge of her post with in one month after the issue of this appointment order
5. Charge reports should be sent to all concerned.
6. NO TA/DA etc is allowed

EXECUTIVE DISTRICT OFFICER  
E & SECY EDU BATTAGRAM

Endst No 294-701AB/Sub (F).

Dated 01-09-2009.

Copy forwarded for information & necessary action to the:-

- 1:- P.S to DCO Battagram..
- 2:- District Accounts Officer concerned
- 3:- Distt. Officer Female Concerned..
- 4:- Candidate concerned
- 5:- Personal file

*Verified*

*[Signature]*

DISTRICT OFFICER (FEMALE)  
E & SECY EDU BATTAGRAM

DISTRICT OFFICER (FEMALE)  
ELEMENTARY & SECONDARY EDUCATION  
BATTAGRAM

*Mustafiz*

7  
**ATTESTED**

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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

Annex "B"

OFFICE ORDER

Consequent upon ban relaxation by the competent authority, Mst. Nighat Seema (AT) GGMS Gidri Khairabad District Battagram is hereby transferred/adjusted against the vacant post of (AT) at GGMS Amir Abad Dakki District Charsadda on her own pay & BPS in the interest of public service with effect from the date of her taking over charge.

- Note: -
1. Charge report should be submitted to all concerned.
  2. No TA/DA etc are allowed.
  3. The EDO concerned is directed to check her original service documents before making payment of salary.
  4. Her Seniority will be determined as per rules/policy.

DIRECTOR  
ELEMENTARY & SECY. EDUCATION  
KHYBER PAKHTUNKHWA

Order No. 17,66-71 /F.No.1677 Vol-5 Transfer(F) K.P. Dated Pesh: the 16 / 11 /2012

Copy of the above is to the:-

1. Executive District Officer (E&SE) Battagram & Charsadda. -
2. District Accounts Officers Battagram & Charsadda.
3. Teacher concerned.
4. Headmistress concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. M/File.

*[Signature]*  
 DISTRICT OFFICER (E&SE)  
 ELEMENTARY & SECONDARY EDUCATION  
 PESHAWAR

*[Signature]*  
 Deputy Directress (E/lab)  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

Manzoor  
\*\*\*\*\*

*[Signature]*

*[Signature]*

ATTESTED

LAST PAY CERTIFICATE

(14)

Pay Certificate of Nighal Seema  
G.M.S. Giddi Chaur Abad Battagram  
transferred to G.M.S. Amer Abad Distt. Charsadda

He has been paid upto 30-11-2012

at the following rates:  
Particulars:  
Substantive Pay  
Officiating Pay  
Exchange Compensation Allowance

P No 00607147

Pay = 8500  
GRA = 1566  
CIA = 2000  
MA = 1000  
UAA = 10000  
Ad 5% = 1900  
Ad 2011 = 871  
Ad 2012 = 1700

G Total = 18814

PC No 112  
By Sp. P. 2011  
1-12-2011

*[Signature]*  
District Accounts Officer  
Battagram

CP = 1520 BF = 180  
AS = 1391 15

He is in charge of the Office of  
on the  
noon of

Recoveries are to be made from the pay of the Government servant as detailed on the reverse.  
He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

From ..... to ..... at Rs ..... a month  
From ..... to ..... at Rs ..... a month  
From ..... to ..... at Rs ..... a month

*[Signature]*  
Head Mistress  
G.M.S. Giddi Chaur  
Distt. Charsadda

6. He is entitled to draw the following:—  
7. He is also entitled to joining time for ..... days.  
8. The details to the Income Tax recovered from him upto the date from the beginning of the current year are given on the reverse.

Budst No 7018-19 dt: 30/11/12

- ① BDO (F&SE) Charsadda
- ② DAO (F&SE) Charsadda

Dated at ..... 19 .....

*[Signature]*  
District Officer (Female)  
Elementary & Secondary Education  
Battagram

Signature.....  
Designation.....  
DISTRICT OFFICER (FEMALE)  
ELEMENTARY & SECONDARY EDUCATION  
BATTGRAM

*[Signature]*

ATTESTED

(15)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) CHARSAKDA

OFFICE ORDER

Mstt: Nighat Seema AT GGMS Gidri Khair Abad District Battagram under transferred to GGMS Amir Abad Dhakki is hereby posted at GGHS Dado Killi against the vacant post AT on her own pay & grade in the interest of public service with immediate effect.

Note:-

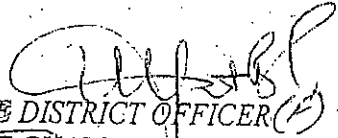
1. No TA/DA is allowed
2. Charge report should be submitted to all concerned.

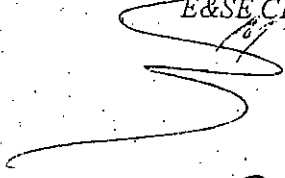
(ATTA ULLAH KHAN)  
EXECUTIVE DISTRICT OFFICER  
E&SE CHARSAKDA

Endstt No. 2486-90 /Dated Charsakda the 6/12/12

Copy for Information & Necessary action to the:

1. District Account Office Charsakda
2. Head Mistress Concerned
3. Accountant Local Office
4. ADO B&A/Suptt: Local Office
5. Official Concerned
6. Office File

  
EXECUTIVE DISTRICT OFFICER (E&SE)  
CHARSAKDA

  
Said qur

ATTESTED



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Annex C

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) (E&S) BATTAGRAM.

NO 7514 Verification

Dated 09/01/2013.

To

The District Education Officer Female,  
(E&S) Education Charsadda.

Subject: VERIFICATION OF SERVICE DOCUMENTS.

Memo:

Reference your letter No.119 Dated 07/01/2013 on the subject noted above.

The transfer orders in respect of Mst. Nighat Seema AT GCMS, Gidri

Khair Abad Battagram transfer to GCMS, Amir Abad Charsadda issued vide

Director Elementary & Secondary Education Khyber Pakhtunkawa Peshawar

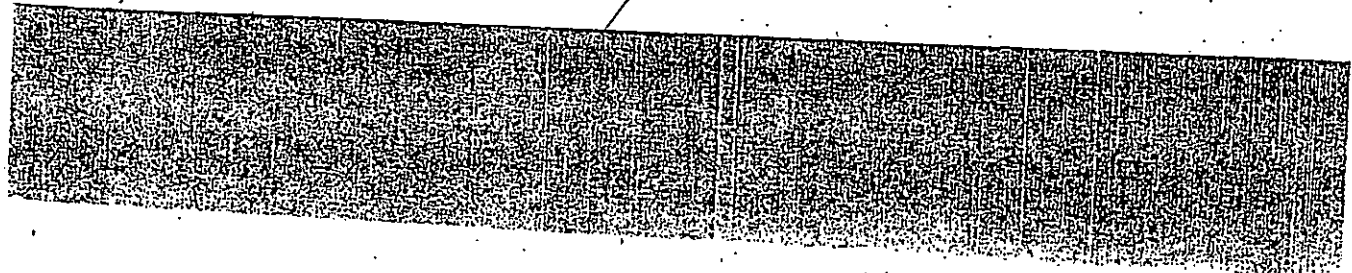
order under Endst No.1766-71 Dated:16-11-2012. Checked with office record

verified and found correct.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) (E&S) BATTAGRAM

*[Signature]*

ATTESTED



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OFFICE OF THE DISTRICT EDUCATION OFFICER  
FEMALE CHARSAKDA  
NO. 272 /DATED/ 14/1/2013

To

The Head Mistress  
GGHS Dado Killi Charsakda

SUBJECT:- VERIFICATION OF SERVICE DOCUMENTS

Memo

The following documents along with original S/Book /LPC/ Transfer order in r/o Mstt. Nihat Seema (AT) of your school has been unified from DEO (F) Education Battagram through special messenger.

Her pay may be therefore released.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

*[Signature]*

ATTESTED

17  
14  
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18

OFFICE OF THE DISTRICT EDUCATION OFFICER

(FEMALE) CHARSAKDA

No. 207

Date

18/3

2013

The District Accounts Officer,  
Charsakda

SUBJECT: RELEASE OF PAY

Memo:

The documents in r/o Mst. Nighat Seema D/O Raz Muhammad GCNIS (AT) Dado Killi has been verified from the concerned Board/Universities and found correct.

In the light of the above mentioned verification, the undersigned is pleased to release the pay of the said teacher.

DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

16/3

Endst: No

Copy for information to the:  
1. Head Mistress concerned

DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

ATTESTED

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**Dist. Govt. NWFP-Provincial  
District Accounts Office Charsadda  
Monthly Salary Statement (September-2017)**

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**Personal Information of Ms NIGHAT SEEMA d/w/s of RAZ MUHAMMAD**  
 Personnel Number: 00607147 CNIC: 1710154189974  
 Date of Birth: 09.03.1987 Entry into Govt. Service: 01.09.2009

NTN:  
 Length of Service: 08 Years 01 Months 001 Days

**Employment Category: Vocational Temporary**  
 Designation: ARABIC TEACHER  
 BDO Code: CA6206- 80001160-DISTRICT GOVERNMENT KHYBE  
 Payroll Section: 001 GPF Section: 001 Cash Center: 01  
 GPF A/C No: 607147 Interest Applied: Yes GPF Balance: 129,428.00  
 Vendor Number: -  
 Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 5

Wage type		Amount	Wage type		Amount
0001	Basic Pay	22,770.00	1000	House Rent Allowance	1,566.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	530.00	2199	Adhoc Relief Allow @10%	365.00
2211	Adhoc Relief All 2016 10%	1,911.00	2224	Adhoc Relief All 2017 10%	2,277.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription - Rs2890	-2,890.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-2.00	3990	Emp.Edu, Fund-KPK	-125.00
4004	R. Benefits & Death Comp:	-1,052.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 20.30 Recovered till September-2017: 2.00 Exempted: 7.41 Recoverable: 10.89

Gross Pay (Rs.): 33,775.00 Deductions: (Rs.): -4,669.00 Net Pay: (Rs.): 29,106.00

Payee Name: NIGHAT SEEMA  
 Account Number: 02177900409603  
 Bank Details: HABIB BANK LIMITED, 220217 TEHSIL BAZAR, CHARSADDA. TEHSIL BAZAR, CHARSADDA., CHARSADDA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: BITAGRAM Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address: City: Email: marwajanichd@gmail.com

*Signature*

System generated document in accordance with APPM 4.6.12.9 (SERVICES/29.09.2017/20:15:23/v1.1)  
 \* All amounts are in Pak Rupees  
 \* Errors & omissions excepted

**ATTESTED**



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OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
CHARSADDA

No 106/13 dated 22/11/2017

Annex "D"

Office order

In the light of inquiries report & court judgments, the appointments of the following teachers are illegal, void ab-initio and against the prescribed rules, therefore the services of the following teachers are hereby dispensed hence they are no more remained teachers.

S.NO	NAME OF TEACHERS	DESIGNATION	SCHOOL NAMES	REMARKS
01	Zia Gul	DM	GGMS Hameed mian dheri Charsadda	Through court Judgment w/p no 2028/2017, enquiry report.
02	Nighat seema	AT	GGHS Dado killi charsadda	Through verification vide letter No 312 dated 18-01-2017
03	Hasrat PET	PET	GGHS turlandi charsadda	DO
04	Sania wali	SST	GGHS Daulat pura	Vide letter No, 7603 dated 13-10-2017 send by the DEO (F) to director, response vide letter No, 2630 dated 13-10-2017
05	Sharna begum	PST	GGPS pegham koroono charsadda	Through judgment w/p no 4738-p/2016 & enquiry report

DISTRICT EDUCATION OFFICER  
FEMALE CHARSADDA

Endst N \_\_\_\_\_ dated \_\_\_\_\_ 2017

- Copy for information
- (1) Registrar Judicial Peshawar high court.
  - (2) Director E&SE kpk peshawar.
  - (3) Official concerned.

DISTRICT EDUCATION OFFICER  
FEMALE CHARSADDA

Received on  
2/12/2017

Fair DA

Received dated 2-12-17  
at 01:12 pm

Chatterjee

ATTESTED

Ammer "E" (21)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

S.A. 1380 /2019

Case No. 1617

Date 08/11/2018

Nighat Seema D/O Raz Muhammad R/o Noor  
Bahar Colony No.1 District Charsadda.

Appellant

**VERSUS**

- ✓1. The secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa.
- ✓2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- ✓3. District Education officer Female Charsadda.
- ✓4. District Education Officer Female Batagram.

Respondents

**APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT,  
1974 AGAINST THE ORIGINAL ORDER  
DATED 22/11/2017, WHEREBY SERVICES OF  
THE APPELLANT WAS DISPENSED, WHICH  
IS AGAINST THE LAW, RULES,  
PRINCIPLES OF NATURAL JUSTICE, VOID  
ABINITIO IS NOT APPLICABLE ON THE  
RIGHTS OF THE APPELLANT**

**PRAYERS:-**

ON ACCEPTANCE OF THIS APPEAL THE  
IMPUGNED ORDER DATED 22/11/2017 MAY

**ATTESTED**

KINDLY BE SET ASIDE BEING ILLEGAL VOID  
ABINITIO AND THE APPELLANT MAY  
KINDLY BE REINSTATED INTO SERVICE  
WITH ALL BACK BENEFITS.

Respectfully Sheweth,

The appellant submits as under:-

Facts:-

1. That the appellant after acquiring the requisite qualification was appointed on dated 01/09/2009 by the competent authority as AT Teacher (BPS-09) and was posted at Government girls Middle School Gidri Khairabad District Batagram and after appointment the appellant performed her duties with great zeal zeast. (Copy of the appointment order is annexed as annexure "A")
2. That the appellant was transferred by the Respondents from district Batagram to District Charsadda vide order dated 16/11/2012 and was posted at Government Girls Middle School Amir Abad Daki District Charsadda and then vide order dated 04/12/2012 the appellant was posted as AT Teacher at Government Girls High School Dadu Kalay. (Copy of the LPC in

*M. G. J.*

ATTESTED

District Batagram is annexed as annexure "B" and the transfer order dated 16/11/2012 is annexed as annexure "C" and order dated 04/12/2012 is annexed as annexure "D").

3. That after assuming the charge and performing of his duty the services of the appellant was duly verified from the District Education Officer Female Batagram vide letter No.7519/ verification dated 09/01/2013 and after the verification of the service as well as Educational documents of the appellant the district Education Officers Female Charsadda vide order No.270 dated 16/01/2013 order for release pay of the appellant. (Copies of the same are annexed as annexure "E,F & G" and pay slip is annexed as annexure "H")

4. That all of a sudden services of the appellant was dispense with vide impugned order dated 22/11/2017 though the word dispenses of services has no where mentioned in any service law or rules. (Copy of the impugned order is annexed as annexure "I")

*Handwritten signature*

ATTESTED



- 5. That feeling aggrieved from the order dated 22/11/2017 the appellant filed a departmental appeal before Respondent No.1 however the same has not yet been decided. (Copy of the Departmental Appeal is annexed as annexure "J")
- 6. That feeling aggrieved from the impugned order the appellant filing this appeal on the following grounds inter alia:-

**GROUND:-**

- A. That the impugned order is against the law, rules and, principle of natural justice, hence void abinitio.
- B. That the punishment of dispensation of service is neither been mentioned in the Efficiency and Disciplinary Rules 2011. Nor did in the Khyber Pakhtunkhwa Civil Servant Act 1973, or any other Law and Rules so on this score alone the impugned orders are liable to be set aside.

*[Handwritten signature]*

**ATTESTED**

(25)

c. That the appellant since her appointment with effect from 2009 till the impugned order served the department and regularly received salaries. So valuable rights of the appellant has been created and the appellant under the principle of locus pententia is entitled for reinstatement.

d. That the appellant has been subjected to discrimination hence the Respondents violated articles 25 of the constitution of Islamic republic of Pakistan 1973.

e. That the impugned order is not speaking orders.

f. That the right of fair Trails has not been provided to the appellant hence violated Article 10-A of the constitution of Islamic Republic of Pakistan 1973.

g. That no charge sheet, statement of allegation final show cause notice is served upon the appellant. Nor did any regular inquiry was

ATTESTED

conducted hence the whole proceeding were illegal.

H. That appellant has not been provided opportunity of personal hearing hence condemned unheard.

I. That appellant seeks permission of this Hon'ble Tribunal to adduce other grounds during course of arguments.

It is, therefore, most humbly prayed that the appeal may kindly be accepted as prayed for in the heading of the appeal.

Dated: 08/11/2018

**ATTESTED**

*Sigmal Eem*  
Appellant

Through

*Naila San*  
Naila San  
Advocate, High Court  
Peshawar.

NOTE:-

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

*Naila San*  
Advocate

conducted hence the whole proceeding were illegal.

H. That appellant has not been provided opportunity of personal hearing hence condemned unheard.

I. That appellant seeks permission of this Hon'ble Tribunal to adduce other grounds during course of arguments.

It is, therefore, most humbly prayed that the appeal may kindly be accepted as prayed for in the heading of the appeal.

Dated: 08/11/2018.

*Qighal Eemari*  
Appellant

Through

*Naila San*  
Naila San  
Advocate, High Court  
Peshawar.

ATTESTED

NOTE:-

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

*Naila San*  
Advocate *Naila San*

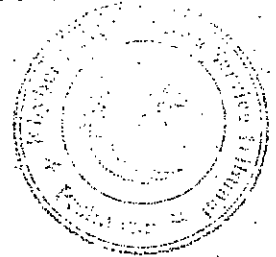
28

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. 550/2018

Date of Institution ... 17.04.2018

Date of Decision ... 11.11.2021



Mst. Zia Gul (Drawing Master BPS-15) Wife of Hamayoun Abil Rahman Resident of Mohallah Painda Khel Tehsil & District Charsadda.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and three others.

... (Respondents)

MR. MOHIB JAN SALARZAI,  
Advocate

(For appellant in Service Appeal No.550/2018).

MS. NAILA JAN,  
Advocate

(For appellants in Service Appeals No. 1380/2018 & 1390/2018).

MR. KABIRULLAH KHATTAK,  
Additional Advocate General

--- For respondents.

MR. SALAH-UD-DIN  
MR. ATIQ-UR-REHMAN WAZIR

--- MEMBER (JUDICIAL)  
--- MEMBER (EXECUTIVE)

JUDGMENT:

SALAH-UD-DIN, MEMBER:-

Through this single judgment we intends to dispose of instant Service Appeal as well as connected Service Appeal bearing No. 1380/2018 titled "Nighat Seema Versus the Secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa and three others" and Service Appeal bearing No. 1390/2018 titled "Mst. Shama Begum Versus Director Elementary and Secondary Education Khyber

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Member (Judicial)

Pakhtunkhwa Peshawar and four others", as common question of law and facts are involved therein.

2. Brief facts as alleged by the appellant in the instant service appeal are that certain posts of Drawing Masters were advertised through newspaper in the year 2006; that as the appellant was eligible and qualified for the said post, therefore, she applied for the same and was properly appointed vide appointment order dated 14.03.2006 issued upon recommendations of the Departmental Selection Committee after fulfilling of all legal and codal formalities; that the appellant was initially posted at Government Girls Middle School Thakot and was later on transferred to District Charsadda vide order dated 27.10.2011; that the salary of the appellant was astonishingly stopped in the month of January 2017, therefore, she filed Writ Petition in the august Peshawar High Court, Peshawar, seeking release of her salary; that vide order dated 14.09.2017, august Peshawar High Court, Peshawar directed the Director Anti-Corruption Khyber Pakhtunkhwa for probe into the matter and to submit his report in the court; that the Director Anti-Corruption instead of submitting his report in the Worthy High Court, straightaway registered FIR against the appellant as well as others, which has been challenged through filing of Writ Petition before august Peshawar High Court, Peshawar, wherein interim relief has been granted and the matter is still sub-judice; that the District Education Officer (Female) District Charsadda did not conduct any departmental inquiry and straightaway issued the impugned office order dated 22.11.2017, whereby the service of the appellant was dispensed with; that the impugned order dated 22.11.2017 was challenged through filing of departmental appeal, however the same was not responded within the statutory period, hence the instant service appeal.

3. Precise facts as alleged by the appellant in Service Appeal No. 1380/2018 are that she was appointed as Arabic Teacher vide order dated 01.09.2009 issued by the

Handwritten signature and stamp of the District Education Officer (Female) District Charsadda.

ATTESTED

competent Authority and she was posted in Government Girls Middle School Gidri Khairabad District Battagram; that the appellant performed her duty with zeal and zest and was later on transferred to Government Girls Middle School Amir Abad Daki District Charsadda; that vide order dated 04.12.2012 the appellant was posted as Arabic Teacher in Government Girls High School Dadu Kally; that upon transfer of the appellant from District Battagram to District Charsadda, District Education Officer (Female) Battagram issued letter dated 09.01.2013, whereby the service as well as Educational documents of the appellant were verified, where-after District Education Officer (Female) Charsadda issued letter dated 16.01.2013 for release of salary of the appellant; that the appellant was receiving her salary, however all of a sudden, impugned order dated 22.11.2017 was issued, whereby service of the appellant was dispensed with; that the appellant challenged the same through filing of departmental appeal, which was not responded, therefore, the appellant filed the instant service appeal for redressal of her grievance.

4. Briefly stated the facts as alleged by the appellant in Service Appeal bearing No. 1390/2018 are that she had successfully completed/passed the required course of PTC Program in the year 1998 and was subsequently appointed as trained PTC vide order dated 07.05.2003 issued by Agency Education Officer Khyber Agency; that the appellant was posted in Government Girls Primary school Akakhel Bara Khyber Agency and was later on transferred to Government Girls Primary School Pemall Sharif Battagram, where she performed her duty with zeal and zest; that the appellant was then transferred to District Charsadda and served in various schools; that the Educational documents as well as appointment order of the appellant were verified by the concerned officer during her transfer from one school to another; that while serving in Government Girls Primary School Pegham Koroona District Charsadda, impugned order dated 22.11.2017 was issued, whereby the service of the

*[Handwritten signature]*

*[Handwritten signature]*

**ATTESTED**

appellant was dispensed with; that the same was challenged by the appellant through filing of departmental appeal, which was rejected on 29.02.2017 and communicated to the appellant on 05.10.2018; hence the instant service appeal.

5. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellants in their appeals.

6. Mr. Mohib Jan Salarzai, Advocate, representing the appellant in the instant service appeal has contended that the appellant was properly appointed as Drawing Master by the competent Authority upon approval of District Selection Committee; that the appellant has served in various schools and has rendered services in the Education Department for more than 11 years and was also receiving her salary till illegal stoppage of the same by the respondents in the month of January 2017; that the appellant had filed Writ Petition No. 2028-P/2017 in the august Peshawar High Court, Peshawar seeking release of her salary; that during the proceedings in the aforementioned Writ Petition, august Peshawar High Court, Peshawar referred the matter to Anti-Corruption Department with the directions to probe into the matter and submit its report, however instead of submitting its report, Circle Officer Anti-Corruption Establishment Charsadda directly registered FIR against the appellant as well as others, which has been challenged through filing of Writ Petition and interim relief has been granted to the appellant; that the departmental Authority has not conducted any inquiry against the appellant and has directly issued the impugned order, whereby services of the appellant were dispensed with by wrongly and illegally mentioning in the column of remarks that the same was done in light of judgment rendered in Writ Petition No. 2028-P/2017 because the said Writ Petition was dismissed being infructuous; that no regular inquiry was conducted in the matter and the appellant was condemned unheard; that upon transfer of the appellant to various schools, the

*[Handwritten signature]*

**ATTESTED**

**ATTESTED**  
*[Signature]*  
EXAMINER  
Department of Education  
Peshawar



concerned officers have verified the appointment order as well as service record of the appellant through written letters; that the impugned order being wrong and illegal is liable to be set-aside and the appellant is entitled to be reinstated in service with all back benefits. Reliance was placed on 2004 SCMR 303, 2009 SCMR 412, 2009 SCMR 663, 2011 SCMR 1220, 2004 SCMR 468 and 1997 SCMR 1552.


7. Ms. Naila Jan, Advocate, representing the appellants in connected Service Appeals No. 1380/2018 and 1390/2018 has relied upon the arguments advanced by learned counsel for the appellant in the instant service appeal.

8. On the other hand, learned Additional Advocate General for the respondents has contended that after a thorough inquiry into the matter, the appointments as well as all record pertaining to the service of the appellants were found fake and bogus; that the appellants were associated in the inquiry and proper opportunity of self defence as well as personal hearing were provided to them; that the inquiry officer has found the appointment orders of the appellants as fake and recommended that FIR may be registered against the appellants and the salaries received by them may be recovered and refunded in the government exchequer; that a proper legal inquiry was conducted into the matter by complying all legal and codal formalities, therefore, the impugned order may be kept intact and the appeals in hand may be dismissed. Reliance was placed on judgments dated 28.01.2019, 09.08.2017 and 13.01.2021 rendered by this Tribunal in Service Appeals No. 540/2014, 161/2014 and 13/2018 respectively.

9. We have heard the arguments of learned counsel for the appellants as well as learned Additional Advocate General for the respondents and have perused the record.

10. A perusal of the record would show that the appellants have alleged that they were properly appointed upon the

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ATTESTED  
  
 ATTESTED

recommendations of Departmental Selection Committee and they had served for so many years in various schools, however vide impugned order dated 22.11.2017, their services were dispensed with without any regular inquiry being conducted by the competent Authority. A bare perusal of the impugned order dated 22.11.2017 would show that the same was not passed in light of any regular inquiry conducted into the matter upon order of the competent Authority. The appellants have allegedly rendered services for considerable long period, therefore, it was incumbent upon the competent Authority to have conducted a proper inquiry into the matter prior to declaring the appointment orders of the appellants as fake. The appellants have not been afforded fair opportunity to defend themselves. The competent Authority has though given reference of court judgments rendered in Writ Petitions No. 2028-P/2017 and 4738-P/2017 in the column of remarks of the impugned orders, however the respondents have failed to produce any such judgments, whereby august Peshawar High Court, Peshawar had ordered for dispensing with the services of the appellants.

11. In view of the above discussion, the appeal in hand as well as connected Service Appeal bearing No. 1380/2018 titled "Nighat Seema Versus The Secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa and three others" and Service Appeal bearing No. 1390/2018 titled "Mst. Shama Begum Versus Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar and four others", are allowed by setting-aside the impugned orders and the matter is remitted to the respondents to conduct regular inquiry into the matter within a period of 90 days of receipt of copy of this judgment. Needles to mention that the appellants shall be associated with the inquiry by providing them fair opportunity of defending themselves. Keeping in view the peculiar nature of controversy in question, no order regarding release of salaries of the appellants could be passed at this stage, which of course

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would be subject to outcome of the inquiry. Findings in this judgment shall have no bearing upon the criminal case registered vide FIR No. 02/2017 Police Station Anti-Corruption Establishment Charsadda. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
11.11.2021

(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

Chief Justice  
Peshawar

Date of presentation of application 12/11/2021  
Number of words 3200  
Copy fee 34/-  
Fees -  
Total 34/-  
Date of completion of copy 22/12/2021  
Date of delivery of copy 22/12/2021

ATTESTED

Amend "F"

35



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

Khyber Pakhtunkhwa  
Service Tribunal

Execution petition No. 116 /2022

In

Service Appeal No: 1380/2018

Diary No. 306

Date 16/02/2022

Mst. Nighat Seema D/o Raz Muhammad R/o Noor  
Bahar Colony No.1, District Charsadda.

.....Petitioner

**V**ersus

1. The Secretary, Elementary & Secondary Education, Government of Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer, Female, Charsadda.
4. District Education Officer (F), Batagram.

.....Respondents

**EXECUTION PETITION FOR**  
**IMPLEMENTATION OF THE**  
**JUDGMENT OF THIS HON'BLE**  
**TRIBUNAL IN APPEAL No.**  
**1390/2018 DECIDED ON 11-11-**  
**2021**

Respectfully Sheweth,

1. That the above mention appeal was decided by this Hon'ble Tribunal vide Judgment dated 11/11/2021. (Copy of the judgment is annexed as annexure "A")
2. That the relevant portion of the judgment is reproduced "In view of the above discussion, the appeal in hand as well as connected Service Appeal bearing No. 1380/2018 titled "Nighat Seema Versus The Secretary Elementary and Secondary Education Government of Khyber

Certified to be true copy  
*[Signature]*  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Annex "G" (36)

BEFORE THE KHYBER PUKHTUN KHAWA SERVICE TRIBUNAL PESHAWAR

**SUBJECT: Implementation reports**

Memo:

- (1) That the Hon'ble. Khyber Pukhtun Service Tribunal Peshawar (1) S/Appeal No 1639/2019, titled Mst Nazma Ali, (2) S/Appeal NO, 1380/2019 titled Mst Nighat Seema (3) S/Appeal No, 550/2018 Mst Zia Gul (4) S/Appeal NO, 1390/18 Mst Shama Begum V/S Government of Khyber Pukhtun khwa E&SE department Peshawar, were remanded to the Competent authority for de novo proceeding vide judgment dated 11-11-2021.
- (2) That de novo proceeding were conducted in compliance with judgment of the Hon,ble service tribunal and the petitioners/Appellants were removed from service vide Endst NO, 12025-30 dated 16-06-2022. (Copies Appended)
- (3) That the respondent department filed CPLAs against the said Judgments vide CPLAs NO, 55, 56, 57, 58-P/2022

it is therefore humbly requested that the Judgments dated 11-11-201 has been Implemented as such Execution petitions may very graciously be Consigned please,

*Sumer 25/08/22*  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

ATTESTED



27

Office of the District Education Officer Female

District Charsadda

0919220086 emischarsadda.deof@yahoo.com

No. 6720 / Dated 20 / 01 - 2022.

Notification

In the light of the Judgment passed by the Hon,ble Service Tribunal on 11-11-2021 with others (3) club cases, the competent authority is pleased to reinstate the following teachers for the purpose of de novo enquiry only.

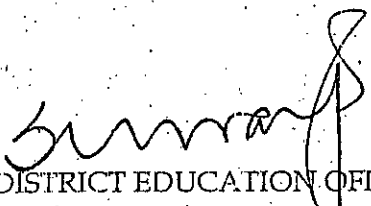
S.No.	Name of teacher	School names
1	Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
2	Mst shama begum Ex-PST	GGPS pigham Charsadda
3	Nighat seema Ex AT	GGHS Dadu killi Charsadda
4	Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda

DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

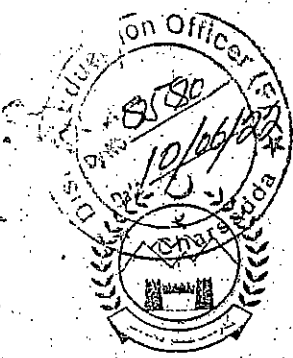
Endst NO 6720-4 dated 20 / 01 - 2022

Copy for information

- (1) PA to director E&SE khber pukhtoon khwa.
- (2) Mst Nazma Ali Ex-CT GGMS Rajjar Charsadda.
- (3) Mst Shama begum EX-PST GGPS Pigham 'killi Charsadda.
- (4) Mst Nighat seema EX-AT GGHS Dadu killi Charsadda.
- (5) Mst Zia Gul EX- DM- GGMS dheri Hameed Mian Charsdda.
- (6) office file.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

  
ATTESTED



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**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR**  
Phone No: 091-9225339, Fax #: 091-9219936

No. 7671 /AD (Lit-II)

Dated Peshawar the 03 / 06 /2022

*ADO (Lit II) ADO S/P  
Keep in record  
in party of Nazima  
DBO*

To: The District Education Officer,  
(Female) Charsadda.

Subject: - SERVICE APPEAL NO. 1639/2019 TITLED BY MST. NAZIMA ALI  
SERVICE APPEAL NO. 1390/2018 BY MST. SHAMA BEGUM. SERVICE  
APPEAL NO. 1380/2019 TITLED BY NIGHAT SEEMA SERVICE  
APPEAL NO. 550/2018 TITLED BY ZIA GUL.

**Memo:**

I am directed to refer you letter No. 8158 dated 03-03-2022 on the subject cited above & to intimate you that vide Notification bearing Endst No. 469-72/F. No. Lit-II Charsadda Nazima Ali/SA: 1639/19 dated 16-03-2022, inquiry has been conducted in the titled cases by this Directorate E&SE on your request vide the above cited letter.

In this regard, the Chairman of inquiry committee has submitted inquiry report vide letter No. 723 dated 28-04-2022 consisting of 5 pages & 24 Annexures is hereby forwarded with the directions that an appropriate action may be taken pursuant to the recommendation of the inquiry report immediately being a competent authority, under the intimation of this Directorate E&SE Khyber Pakhtunkhwa Peshawar please.

*11/06/2022*  
ASSISTANT DIRECTOR (LIT: II)

Endst No: \_\_\_\_\_

Dated Peshawar the: \_\_\_/\_\_\_/2022.

**Copy forwarded for information to the:-**

1. Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. Principal GHSS Musazia Peshawar.
3. Deputy District Education Officer (Male) Mohmand.
4. Deputy Director (Legal) E&SE Khyber Pakhtunkhwa Peshawar.
5. Deputy Directress (Estab/F-I) E&SE Khyber Pakhtunkhwa Peshawar.
6. PA to Director E&SE, Khyber Pakhtunkhwa Peshawar.
7. Master file.

ASSISTANT DIRECTOR (LIT: II)

**ATTESTED**

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OFFICE OF THE PRINCIPAL GHSS MOSA ZAI PESHAWAR

No. 723 /Inquiry Charsadda (F)

Dated: 28/4/2022

To

The Director  
Elementary & Secondary Education KP Peshawar.

SUBJECT: INQUIRY REPORT REGARDING SERVICE APPEAL NO1639/2019 TITLED MST NAZMA ALI, SERVICE APPEAL NO 1390/2018 TITLED MST SHAMA BEGUM, SERVICE APPEAL NO 1380/2019 TITLED NIGHAT SEEMA AND SERVICE APPEAL NO 550/2018 TITLED ZIA BEGUM

R/Sir,

Kindly refer to your office Notification No 469-72 dated 16/3/2022 enclosed please find herewith Inquiry Report consisting of 5 pages and 24 Annexures is submitted to your goodself for further necessary action please.

*Shabeer Ahmad*  
Shabeer Ahmad

PRINCIPAL  
GHSS Mosa zai Peshawar

912-I

1864  
29/3/2022

ATTESTED



**INTRODUCTION:**

The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar constituted the following committee vide his office Notification No 469-72 dated 16/3/2022 received on 29/3/2022 to probe as per report of the DEO(F) Charsadda letter No 8158 dated 3/3/2022 regarding Service Appeal No1639/2019 titled Mst Nazma Ali, Service Appeal No 1390/2018 titled Mst Shama Begum, Service Appeal No 1380/2019 titled Nighat Seema and Service Appeal No 550/2018 titled Zia Begum.

- ❖ Mr. Shabeer Ahmad Principal (BS-19) GHSS Mosazia Peshawar Chairman
- ❖ Mr. Liaqat Ali (Bs-18) DDEO(M) Mohmand Member

Annexure ---1 & 2

**PROCEEDINGS:**

- ❖ The committee visited the o/o the DEO (F) Charsadda on 31/3/2022 before informing the DEO (F) Charsadda telephonically on 30/3/2022 but it was very sad that she did not bother to attend the committee. However, the Committee was handed over the related record by the Litigation branch.
- ❖ The DEO (F) Charsadda was requested through a letter No 706 dated 8.4.2022 to be present with all the relevant record along with statement in speaking order and also inform the concerned Ex- Teachers to appear before the committee on 12.4.2022 at the o/o the DEO (F) Charsadda. Annexure ---03
- ❖ The DEO (F) Charsadda directed all the following 04 Ex- Teachers to appear before the inquiry committee for personal hearing along with all the relevant record/documents on 12/04/2022 at 09:30 AM at the Office of the DEO (F) Charsadda vide DEO (F) Charsadda letter No. 9388-89 dated 08/04/2022.
  - i. Mst. Nazma Ali EX-CT GGMS Rajar Charsadda
  - ii. Mst. Shama Begum Ex- PST GGPS Pigham Charsadda
  - iii. Mst. Nighat Seema Ex- AT GGHS Dadu Killi Charsadda
  - iv. Mst. Zia Gul Ex-DM GGMS Dheri Hamid Mian Charsadda

Annexure --- 04

- ❖ The letters were dispatched to the Ex-teachers/petitioners on their home address through registry. Annexure --- 05. The Ex- teachers were also informed telephonically one day before on 11/4/2022 regarding their personal hearing on 12/04/2022.
- ❖ The inquiry committee again visited the office of DEO (F) Charsadda on 12/04/2022 as per schedule in order to record the statement of the Ex- teachers and further analyse the available record but none of the Ex- teachers/petitioners turned up for personal hearing till office hours on the said date. Attendance is attached as Annexure---6. The DEO (F) Charsadda stated that the four Ex-teachers were called to her office one day before the arrival of the inquiry committee i.e. on 11/4/2022 and asked them to appear before the inquiry committee on 12/4/2022 and handed over the hard copies of her office letter No 9383-87 dated 8/4/2022 in reference to the letter of the inquiry committee but they refused to receive the hard copies. Statement of the DEO (F) Charsadda Mst. Suraya Begum is attached as Annexure -07

After scrutinizing the available record and inquiries at the office of DEO (F) Charsadda, the committee gathered the following:

NAZMA ALI Ex- CT CHARSAKDA

**BACK GROUND & ORIGIN OF THE ISSUE:**

That Nazma Ali Ex-CT was dismissed from service on the charge of fake appointment vide DEO (F) Charsadda No 1508-15 dated 19/07/2019 upon the recommendation of the inquiry report of Miss Naheed Anjum Deputy Directress E&SE Khyber Pakhtunkhwa Peshawar constituted vide No. 9749-51 dated 26/10/2018. The origin of the issue was that the DEO (F) Charsadda requested for inquiry after the anti-corruption Charsadda sent a letter to her office on 25/9/2017 regarding detail of the teachers who were transferred from other districts and ex FAXA from 2006 onward. A letter for verification of service documents was again sent to DEO (F) Battagram vide No 7972 dated 21/7/2017 and reminder for the verification was sent vide No 18919 dated 3/2/2018. The documents were received duly verified vide DEO (F) Battagram No 5390 dated 9/3/2018 bearing signatures like the then DEO (F) Battagram Mst Rehana Yasmin. However, the DEO (F) Charsadda was in doubt and she sent the documents for re verification through email. In reply an email was received from the DEO (F) Battagram in which she told that not only the verification letter was fake but also the

**ATTESTED**

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Dispatch No on the letter did not match with the Dispatch Register.

Annexure---8(Dismisal order) &9 (Inquiry Report).

**FINDINGS OF THE INQUIRY OF Miss NAHEED ANJUM DEPUTY DIRECTRESS E&SE KHYBER PAKHTUNKHWA:**

- The appointment order No. 5509-14 dated 28/01/2011 (District Battagram) is fake and bogus.
- Teacher Attendance Register of GGMS Shamlae revealed that she had never been part of that school.
- The salary record was not traceable from Battagram.
- Transfer order issued by the Directorate No. 833-38/A-167/2013 dated 01/03/2013 was also not confirmed as the file was missing in the Directorate.
- The academic documents provided were also not verified by the institutions concerned.
- Verification of all documents also proved fake.
- The ministerial staff in the female DEO office are responsible for the loss or non-production of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

**FILING OF SERVICE APPEAL IN THE KP SERVICE TRIBUNAL PESHAWAR**

- She filed service appeal No.1639/2019 Vide Diary No.1767 dated 4/12/2019 before the KP Service Tribunal Peshawar for her re-instatement.
- The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a de-novo inquiry.

**SHAMA BEGUM Ex-PST CHARSADDA**

**BACK GROUND & ORIGIN OF THE ISSUE:**

That Shama Begum was dismissed/dispensed from service vide DEO (F) Charsadda No 10643 dated 22/11/2017 at S# 5 upon the recommendation of the inquiry committee consisting of Mr Muhammad Iqbal BS-19 Principal GHS Badabher District Peshawar and Safdar Khan BS-18 Principal GHS Gulshan Rehman Colony Peshawar which was constituted by the Directorate on the request of the DEO (F) Charsadda Vide her Office No4798 dated 22/6/2017. History of the case was that salary of Mst Shama Begum Ex-PST GGPS Piaghani Charsadda was stopped by the then SDEO (F) Charsadda, Miss Nadia (Present DDEO F Peshawar) for the reason that her appointment order and other relevant documents regarding her services were fake as she failed to provide the documents required to the SDEO (F) Charsadda asked vide her office No 219 dated 26/8/2014. That Shama Begum instead of providing the requisite documents to the SDEO concerned knocked at the door of the Honourable Peshawar High Court against the decision of the SDEO (F) Charsadda of her stoppage of pay.

Annexure---10 (Dismissal/Dispensed Order) & 11 (Inquiry Report)

**FINDINGS OF THE INQUIRY COMMITTEE CONSISTING OF Mr. MUHAMMAD IQBAL BS-19 PRINCIPAL GHS BADABHER DISTRICT PESHAWAR AND Mr. SAFDAR KHAN BS-18 PRINCIPAL GHS GULSHAN REHMAN COLONY PESHAWAR which is reproduced as under:**

- 1) The Agency Education Officer Khyber Agency at Jamrud in his written statement when asked about verification of service documents of Mst Shama Begum Ex-PST GGPS Aka Khel Bara Khyber Agency furnished the following to the inquiry committee:
  - i. The name of the school i.e. GGPS Aka Khel Bara Khyber Agency where the teacher concerned was shown her adjustment on her initial appointment neither exist on the grounds of Khyber Agency nor in the papers of the record of Khyber Agency Education Department i.e. in the SNE of the AEO office of the Khyber Agency.
  - ii. The bogus signature ridiculously appended to the appointment order of Mst Shama Begum has been resembling to the signature of the Ex-AEO Khyber Agency Mr Dilbar Khan but his period of service has been w.e.f 21/03/2004 to 16/8/2005 as is evident from the AEO display board in the office of the AEO.
  - iii. Mr Jahngi Khan remained the AEO of Khyber Agency for the period w.e.f 01/04/2003 to 6/8/2003.
  - iv. The bogus signature appended to the LPC of Mst Shama Begum was resembling to the signature of Ex-AEO Khyber Agency Mr. Hashim Khan Afridi which did not match with his specimen signature.
  - v. No record was available regarding appointment/service/salaries of the teacher concerned in the office of the AEO Khyber Agency.
- 2) The Director Education ex FATA Secretariat Peshawar in his written statement has disown the signature appended to the LPC of the teacher concerned.

ATTESTED

- 3) The Director E&SE KP Peshawar in his written statement disown the Endst No and signature appended to the transfe orders in r/o Mst Shama Begum bearing No 12085-97/F.No 103/PTC (F) FATA to settle: dated 13/4/2011 and 3464-69/F.No 51/Gen.Transfer(F) FATA to settle dated 7/9/2011 and further declared that no record was found regarding her transfer either from FATA to District Battagram or from District Battagram to District Charsadda.
- 4) During the course of inquiry proceedings this inquiry committee came across many other anomalies such as :
  - i. The LPC No 975 dated 31/5/2011 prepared for the month of May, 2011 depicts her Basic Pay Rs 3820 per month which is minimum initial of BPS-09 in May 2011.
  - ii. And the LPC No 129 dated 31/8/2011 prepared for the month of August 2011 depicts her Basic Pay Rs 6200 per month which is minimum initial of BPS-09 in July 2011.
  - iii. Whereas the page No 06 of her Service Book shows her Basic pay Rs 5200 in May 2011 and the Rs 8480 in the August 2011 which is 6<sup>th</sup> stage which she might deserve only after passage of his six long years.
- 5) Looking for her own interest to validate her fake services, the teacher concerned driving the nail aright, ultimately succeeded in her fraudulent plan, when in pursuance of the Director E&SE KP Peshawar Endst No 3464-69F.No 51/Gen.Transfer(F) dated 7/9/2011 she was transferred from District Battagram to GGPS Paigham District Charsadda where her pay was started and she claimed and drew her all undue and illegal arrears w.e.f. 31/5/2011 to 01/09/2011 on the basis of fake documents as evident from the page No 07 of her Service Book and pay Roll for the month of June 2011.
- 6) She was paid normally up to 30/6/2014 till her pay was stopped by the SDEO (F) Charsadda for the doubt of fakeness of her basic service documents.

In short the committee stated that all her documents are bogus.

**FILING OF SERVICE APPEAL IN THE KP SERVICE TRIBUNAL PESHAWAR**

- She filed service appeal No.1390/2018 Vide Diary No.1585 dated 30/10/2018 before the KP Service Tribunal Peshawar for her re-instatement
- The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a de-novo inquiry.

**MST. NIGHAT SEEMA EX- AT CHARSADDA**

**BACK GROUND & ORIGIN OF THE ISSUE:**

- ❖ Mst. Nighat Seema was appointed as AT (BS-09) at GGMS Gidri Khair Abad in Battagram District allegedly on a fake and bogus appointment letter bearing Enst No.3964-70 dated 01/09/2009 by DEO (F) Battagram. **Annexure --- 12**
- ❖ She was transferred to GGMS Amir Abad Dhaki District Charsadda vide Director E&SE Khyber Pakhtunkhwa Endst No.1766-71 dated 16/11/2012. **Annexure --- 13**
- ❖ The said teacher was re-adjusted at GGHS Dado Killi Vide DEO E&SE Charsadda Endst No. 2486-90 dated 04/12/2012. **Annexure---14**
- ❖ The DEO (F) Charsadda dispensed with the service of Mst. Nighat Seema for allegedly being fake and bogus on 22/11/2017 vide order No.10643.(Already attached as Annexure-10)
- ❖ The said teacher, being aggrieved, submitted a departmental appeal to Director E&SE KP for re-instatement on 20/12/2017. **Annexure---15**
- ❖ In response to a letter for verification of appointment order and service record of Mst. Nighat Seema. the DEO (F) Battagram in a letter to Directorate E&SE Khyber Pakhtunkhwa Vide No.3046 dated 16/07/2019 stated that the said teacher was never employed and there is no record available regarding her service at DEO (F) Battagram. **Annexure---16**
- ❖ In the meanwhile, Mst. Nighat Seema (Ex-AT) on rejection of her Departmental Appeal by the competent authority submitted service appeal No.1380/2019 Vide Diary No.1617 dated 08/11/2018 before the KP Service Tribunal Peshawar for her re-instatement.
- ❖ The KP Service Tribunal Peshawar in its judgment on 11/11/2021 set aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and ordered a fresh regular inquiry.

**FINDINGS:-**

- 1. Arabic Teacher (AT) is a District cadre post and a domicile holder of one district is not eligible to apply for the said post in another district in normal circumstances as per rules.
- 2. Mst Nighat Seema has no service record at District Battagram as per DEO (F) Battagram report. (Already attached as Annexure 14)
- 3. Mst. Nighat Seema has no salary record at District Battagram.
- 4. DEO (F) Charsadda has also declared the appointment of Mst. Nighat Seema as fake and bogus.

**ATTESTED**

- 5. Mr. Adnan B/O Mst Nighat Seema confessed in Court that his sister's appointment letter was fake and bogus. He further stated that Ameén named clerk who was serving at that time in GHS No 1 Peshawar had taken Rs 5,80,000/- from his father and handed over a fake and bogus order. **Annexure---17**

**MST. ZIA GUL EX-DM CHARSAJDA**

**BACK GROUND & ORIGIN OF THE ISSUE:**

- ❖ Mst. Zia Gul of District Charsadda was appointed as DM (BS-09) on allegedly a fake and bogus appointment letter in District Battagram vide Endst No 3505-09 dated 14/03/2006 and was posted at GGMS Thakot Battagram on her appointment. **Annexure---18**
- ❖ Her posting is also mentioned at GGMS Mohandri (District Mansehra) w.e.f 01/10/2009 as per copy of her service book at page No.50. **Annexure---19**
- ❖ There is no record available of her transfer from GGMS Thakot Battagram to GGMS Mohandri (Mansehra).
- ❖ She was transferred to GGMS Dheri-Hamid Mian Charsadda from GGMS Shalian District Mansehra vide office of the Director E&SE KP Peshawar Endst No.3655-50 dated 27/01/2011. **Annexure---20**
- ❖ It is noteworthy to mention here that there is no record of Mst. Zia Gul either transferred to or served at GGMS Shalian Mansehra.
- ❖ An inquiry was conducted through Mr. Jehangir (Principal) Government Shaheed Osama Zafar GMHSS No.2 Peshawar City and Mr. Khizer Hayat Senior Subject Specialist GHSS No.4 Peshawar city in compliance to Director E&SE KP Notification bearing Enst No.4184-86 dated 25/09/2017.
- ❖ The said inquiry committee in its findings concluded that the appointment order of Zia Gul as DM at GGMS Thakot District Battagram is fake and bogus as per record of DEO (F) Battagram. **Annexure---21**
- ❖ In response to DEO (F) Charsadda letter No.8956 dated 8/12/2016 regarding service verification in R/O Mst. Zia Gul (Ex-DM), the DEO (F) Battagram declared her appointment as fake and bogus vide letter No.312 dated 18/01/2017. **Annexure---22**
- ❖ The Peshawar High Court in its decision on 14/09/2017 in W.P.No 2028-P/2017 referred the case to Director Anticorruption KP with the direction to probe into the matter within a fortnight positively and submit the report. **Annexure---23**
- ❖ The Anticorruption Department Charsadda lodged an FIR against Mst. Zia Gul on 21/09/2019 without submitting an inquiry report to Court or any other office.
- ❖ In the meanwhile, the DEO (F) Charsadda dispensed with the services of Mst. Zia Gul (Ex-DM) for being fake and bogus vide DEO (F) Charsadda order No.10643 dated 22/11/2017. (Already attached as Annexure-10)
- ❖ The Said teacher submitted a Department Appeal for her re-instatement into service to Director E&SE KP on 20/12/2017
- ❖ On-rejection of her appeal by the Appellate Authority, she filed a service appeal in the KP Service Tribunal Peshawar.
- ❖ The KP Service Tribunal gave its judgment in the said case on 11.11.2021, setting aside the impugned order by DEO (F) Charsadda dated 22/11/2017 and also ordered to conduct a regular inquiry into the matter.

**FINDINGS:-**

1. Drawing Master (DM) is a District-cadre post and Mst. Zia Gul (Domicile holder of District Charsadda) was not eligible to apply for DM post at a far flung District Battagram.
2. No record of Mst.Zia Gul's appointment and transfer is available at DEO (F) Battagram.
3. The said teacher was provided a fair opportunity to defend herself by inquiry committee led by Mr. Jehangir (Principal) GHSS No.2 Peshawar city.
4. Mst Zia Gul did not appear for self-defence and personal hearing to the present inquiry committee on 12/04/2022.
5. All the relevant record and the earlier inquiry report clearly suggest that the appointment letter of Mst. Zia Gul (Ex-DM) was fake and bogus.

**CONSOLIDATED MAIN FACTS & FINDINGS OF ALL FOUR CASES:**

After scrutinizing the statement, Inquiries and available record at the on the DEO (F) Charsadda, the following major findings were brought about as a result:

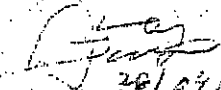
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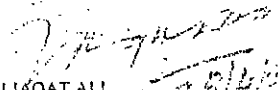
1. All the four posts in the concerned cases i.e CT, PST, AT and DM are District cadre posts and no candidate from out district is eligible to apply for the posts.
2. The Four Ex-teachers i.e. Mst. Nazma Ali (Ex-CT), Shama Begum (Ex-PST), Nighat Seema (Ex-AT) and Mst. Zia Gul (Ex-DM) are the residents of District Charsadda and they were not even eligible for the district cadre posts in out districts.
3. The Four Ex-teachers i.e Mst. Nazma Ali (Ex-CT), Shama Begum (Ex-PST), Nighat Seema (Ex-AT) and Mst. Zia Gul (Ex-DM) deliberately abstained from appearing before the inquiry committee for personal hearing and self-defence on 12/4/2022.
4. As per the earlier inquiry reports, Peshawar High Court decision, thorough scrutiny of available evidences and record, The DEO (F) Charsadda order No.10603 dated 22/11/2017 regarding termination of Shama Begum Ex-PST, Nighat Seema Ex-AT and Zia Gul Ex- DM is legal and justified.
5. That Nazma Ali Ex-CT Dismissal from Service on the charge of fake appointment vide DEO (F) Charsadda No 1508-15 dated 19/07/2019 upon the recommendation of the inquiry report of Miss Naheed Anjum Deputy Directress E&SE Khyber Pakhtunkhwa Peshawar constituted vide No. 9749-51 dated 26/10/2018 is also legal and justified.
6. No action had been taken against the officers/officails responsible for it as per FIR of COACECHD dated 09/10/2017.

Annexure --24

The report is submitted for further necessary action please.

  
Shabeer Ahmad  
20/04/2022

Principal  
Mosa zai Peshawar

  
LIAQAT ALI  
20/04/2022

Deputy District Education Officer  
(Male) Mohmand

ATTESTED

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OFFICE OF THE DIRECTRESS ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

NOTIFICATION

The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar is pleased to constitute the following committee to probe as per DFO Female Charsadda letter No. 8158 dated 3.3.2022.

1. Mr. Shabeer Ahmad Principal (B-19) GHS Mosazai Peshawar Chairperson
2. Mr. Liaqat Ali DDEO Mohmand Member

The inquiry committee will submit report to this office within ten (10) days positively.

**Director**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst. No. 469-72 /F.No.Lit-II Charsadda Nazma Ali SA:1639/19 Dated 16/3/2022

Copy forwarded to the:-

1. Mr. Shabeer Ahmad Principal (B-19) GHS Mosazai Peshawar **(Registered)**
2. Mr. Liaqat Ali Dy. District Education Officer Mohmand **(Registered)**
3. District Education Officer (F) Charsadda with the remarks to assist and provide the relevant record to the Inquiry Officer concerned.
4. PA to Director E&SE Peshawar.

**Assistant Director (Female)**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

ATTESTED

**OFFICE OF THE DIRECTRESS ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

**NOTIFICATION**

The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar is pleased to constitute the following committee to probe as per DEO Female Charsadda letter No 8158 dated 03.03.2022.

1. Mr Shabeer Ahmad principal (B-19)  
GHSS Mosazai Peshawar Chairperson
2. Mr Liaqaat Ali DDEO Mohmand Member

The inquiry committee will submit report to this office within ten 10 days positively.

**Director**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa, Peshawar**

Endst No. 469-72/F.No.Lin-II Charsadda Nazma Ali/SA:1639/19 Dated 16.02.2022

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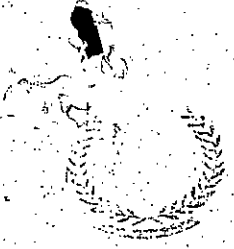
1. Mr Shabeer Ahmad Principal B-19 GHSS Mosazai Peshawar (Registered)
2. Mr Liaqat Ali Dy: District Education Officer Mohmand (Registered)
3. District Education Officer (F) Charsadda with the remarks to assist and provide the relevant record to the Inquiry Officer concerned.
4. PA to Director E&SE Peshawar.

**Assistant Director (Female)**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa, Peshawar**

**ATTESTED**

46

A number 12



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSDADA.  
NO. 2154 / DATED: 23 / 01 / 2022

Immediate Court Matter Case.

To  
The Director,  
E&SE Govt of Khyber Pakhtunkhwa  
Peshawar.

SUBJECT:- APPEAL AGAINST JUDGMENTS ISSUED BY COURT IN CHARSDADA IN 2021

Reference to your letter no 12114 dated 31/12/2021 on the subject noted above as per your directions this office has filed the CPLA against the subject judgments. As the CPLA has already been filed, your good office is requested by the undersign through letters no 6764-66 dated 21/01/2022 and 7876 dated 21/02/2022. It is once again requested to nominate an inquiry officer at your own level in order to avoid legal complication.  
Your good office early response will be highly appreciated please.

DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSDADA

- Endstr No. \_\_\_\_\_
- Copy to the:
1. Section officer litigation (II) E&SE department Khyber Pakhtunkhwa Peshawar.
  2. Deputy Director (legal) E&SE department Khyber Pakhtunkhwa Peshawar.
  3. Office file.

DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSDADA

Handwritten signature and date: 27/01/2022

ATTESTED





OFFICE OF THE PRINCIPAL GHSS MUSAZAI PESHAWAR

97

No. 706 /Inquiry Charsadda (F)

Dated: 08-11-22

To:

The District Education Officer  
(Female) Charsadda

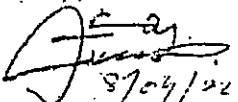
SUBJECT: INQUIRY REGARDING SERVICE APPEAL NO1639/2019 TITLED MST NAZMA ALI, SERVICE APPEAL NO 1390/2018 TITLED MST SHAMA BEGUM, SERVICE APPEAL NO 1380/2019 TITLED NIGHAT SEEMA AND SERVICE APPEAL NO 550/2018 TITLED ZIA BEGUM

Memo.

The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar was pleased to constitute the following committee vide his office Notification No 469-72 dated 16/3/2022 to probe as per report of the DEO(F) Charsadda letter No 8158 dated 3/3/2022 regarding Service Appeal No 1639/2019 titled Mst Nazma Ali, Service Appeal No 1390/2018 titled Mst Shama Begum, Service Appeal No 1380/2019 titled Nighat Seema and Service Appeal No 550/2018 titled Zia Begum:

- Mr. Shabeer Ahmad Principal (BS-19) Chairman
- Mr. Liaqat Ali (Bs-18) DDEO(M) Mohmand Member

You are hereby requested to make ready the record along with your written statement reflecting the whole history in speaking order and also direct/inform the said four Ex-teachers to appear before the committee in person on 12.4.2022 at your office positively.

  
8/11/22  
Shabeer Ahmad

PRINCIPAL  
GHSS Musazai Peshawar

PRINCIPAL  
G.H.S.S. Musazai  
Peshawar

ATTESTED

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OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE)CHARSADDA.

NO. \_\_\_\_\_ DATED \_\_\_\_\_ 2022.

TO

1. MST Nazma Ali Ex.CT GGMS Rajjar.
2. Mst Shama Ex PST GGPS Pigham Chd.
3. Mst Nighat Seema Ex AT GGHS Dadu kili.
4. Mst Zia-BEGUM Ex DM GGMS Dheri Hameed (Mian).

Subject. INQUIRY REGARDING SERVICE APPEAL NO 1639/2019 TITLED MST MST NAMA ALI  
SERVICE APPEAL NO 1390/2018 TITLED TITLED MST-SHAMA BEGUM SERVICE APPEAL  
NO 1380/2019 TITLED NIGHAT SEEMA AND SERVICE APPEAL NO 550/2018 TITLED ZIA  
BEGUM.

MEMO

Reference letter received from the Inquiry Officer vide NO 706/Inquiry Charsadda(f)  
dated. 08.04.2022 regarding above cited subject.

You all are directed to attend the office of the undersigned in person on 12.4.2022 at  
9.30 AM along with your complete service record positively.

Encl (Photo copy attached)

DISTRICT EDUCATION OFFICER  
(FEMALE)CHARSADDA.

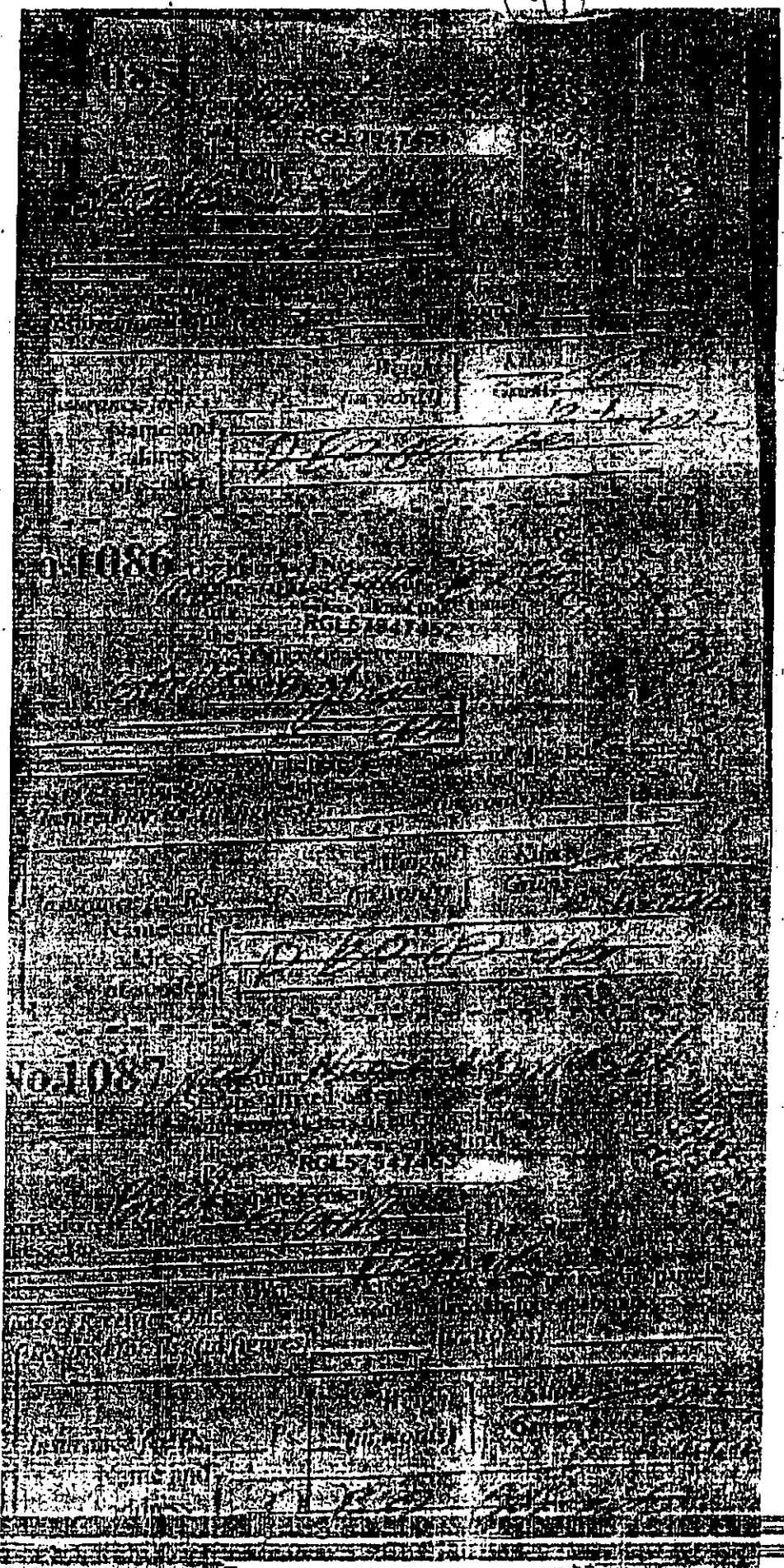
Endst NO 9355-88

Copy forwarded to the

1. Principal GHSS Musazai Peshawar for information please.
2. ADEO(litigation )local office.
3. Office file.

18/4/22  
DISTRICT EDUCATION OFFICER  
(FEMALE)CHARSADDA

ATTESTED



ATTESTED

50

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REGISTRATION

ATTESTED

### ATTENDANCE SHEET

INQUIRY: - VIDE DIRECTORATE OF E&SE KHYBER PAKHTUNKHWA NO:469-72 DATED 16/3/2022

VENUE: - DISTRICT EDUCATION OFFICER (F) CHARSADDA

Date 12/4/2022 (A. S. Office Charsadda)

S.#	NAME OF OFFICER/OFFICIAL	DESIGNATION	CONTACT NO	SIGNATURE
01	Sumaira Begum	District Officer	0333353653	<i>[Signature]</i>
02	Sumaira Begum	Ex. CT		<i>[Signature]</i>
03	Neqhat Seema	Ex - AT		Absent
04	Zia Gul	Ex - I.M		Absent
05	Nazma Ali	Ex - CT		Absent
06	Shagufta Ram	Ex - A.E. (I.M)	—	<i>[Signature]</i>

(5)  
 Summary 12/4/22

ATTESTED

*[Signature]*  
12/4/22

*[Signature]*  
12/09/2022

STATEMENT OF DEO (FEMALE) CHARSAKDA.

MST: SURAYYA BEGUM EX- DEO (F) BANNU / PRESENT DEO (F) CHARSAKDA.

In pursuance of the letter of the inquiry committee vide his office No. 706 dated 8/4/2022, a letter was issued to the Ex-teachers named, Nazma Ali, Shama begum, Nighat Seema and Zia Gul vide DEO (F) Charsakda. No. 9383-87 dated 08/04/2022 with the direction to appear before the inquiry committee in person in the office of the DEO (F) Charsakda on 12/04/2022 along with record. Moreover, the said Ex- Teachers were also informed telephonically to attend this office on 11/04/2022. They attended the office of the DEO (F) Charsakda one day before the arrival of the inquiry committee i-e 11/04/2022. They refused to receive the hard copies of the said letter of this office.

*Surayya Begum 12/04/22*  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

ATTESTED

*[Handwritten signature]*



Office of the District Education Officer Female  
District Charsadda

0919220036

amischarsadda.deof@yahoo.com

No.

Dated

2019

**NOTIFICATION**

1. Whereas Mst Nazma Ali CT (BPS-15) GGHS Rajjar r/o Rajjar Charsadda, was proceeded under Khyber Pakhtun khwa Govt. servants (Efficiency and Discipline) Rules 2011, on the charges of Fake Appointment.

2. And whereas the undersigned directed to the accused teachers through notice hire and again and found her as a fake appointee.

And whereas the Worthy director E&SE Deptt. Khyber Pakhtun khwa Peshawar initiated/conducted enquiry Vide No. 6754 F. No. 1411/Appeal Charsadda, dated 24-05-2019 against Mst Nazma Ali (CT) through Mst. Naheed Anjum Deputy Director Female E&SE Khyber Pakhtoon khwa, Hence the Appointment order of Mst Nazma Ali declared fake by the enquiry officer with the direction to the DEO (F) Charsadda, may register an FIR in the Anti Corruption against the said fake teacher and all amount taken as salary may be recovered and refund to Government exchequer.

3. And Whereas, the show cause notices vide NO 16615 dated 30/5/2018, No.16665 dated, 2/6/2018, No.16736 dated 6/6/2018 and personal hearing, 20825 dated 13/11/2018 and E-mail verification by DEO(F) Battagram dated 23-5-2019 was served upon to Mst Nazma Ali Through DEO (F) Charsadda.

4. And Whereas, the authority having considering the charges, evidence on the record as per enquiry report, hence keeping in view the charges leveled against her have been proved hence she is not remained a civil servant under the rules on account of fake appointment letter.

Therefore, in exercise of the powers conferred by the Khyber pakhtun khwa Govt. servants, (Efficiency and Discipline) rules 2011, the competent authority is pleased to impose the Major penalty of Dismissal from service upon Mst Nazma Ali CT GGHS Rajjar Distt Charsadda with immediate effect.

The DDEO (F) Charsadda already stopped her salary due to having fake appointment letter.

(Ulfat Begum),

District Education officer (Female)  
Charsadda

Endst/No. (SD8-15) dated (19/7/2019)

Copy forwarded for information and n/action to the:

1. PA to the Director E & S Education Khyber Pakhtun khwa Peshawar.
2. PA to the Deputy Commissioner Charsadda.
3. District Monitoring Officer E & SE Charsadda.
4. District Accounts Officers Charsadda.
5. The Concerned DDEO Female Charsadda with the request to recovered the salaries and deposit in Govt. Treasury through Challan under intimation to this office.
6. Head teacher GGHS rajjar Charsadda
7. Mst Nazma Ali Rk CT Charsadda..
8. ADO Estab Primary Local Office.
9. The Anti-Corruption Department Charsadda may be request to register FIR against the said fake teacher for Compliance the Briquiry recommendation.
10. Master file.

(Ulfat Begum),  
District Education officer (Female)  
Charsadda

ATTESTED

**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE**  
**DISTRICT CHARSADDA**

**NOTIFICATION**

1. Whereas Mst Nazma Ali CT (BPS-15) GGHS Rajjar R/o Rajjar Charsadda, was proceeded under Khyber Pakhtunkhwa Govt servants (Efficiency and Discipline) Rules 2011, on the charges of Fake appointment.
2. And whereas the undersigned directed to the accused teachers through notice time and again and found her as a fake appointee.  
And whereas the worthy director E&SE Department Khyber Pakhtunkhwa, Peshawar initiated / conducted enquiry vide No 6754-F, No. 14 (F)/Appeal Charsadda, dated 24.05.2019 against Mst Nazma Ali (Ct) through Mst Naheed Anjum Deputy Director Female E&SE Khyber Pakhtunkhwa. Hence the appointment order of Mst Nazma Ali declared fake by the enquiry officer with the direction to the DEO (F) Charsadda may register an FIR in the Anti Corruption against the said fake teacher and all amount taken as salary may be recovered and refund to Government exchequer.
3. And whereas, the show cause notice vide No. 16615 dated 30.05.2018, No. 16665 dated 02.06.2018, No. 16736 dated 06.06.2018 and personal hearing 20825 dated 13.11.2018 and E-mail verification by DEO (F) Battagram dated 23.05.2019 was served upon to Mst Nazma Ali through DEO (F) Charsadda.
4. And whereas, the authority having considering the charges, evidence on the record as per enquiry report, hence keeping in view the charges leveled against her have been proved, hence she is not remained a civil servant under rules on account of fake appointment letter.  
Therefore, in exercise of the powers conferred by the Khyber Pakhtunkhwa Govt servants, (Efficiency and Discipline) Rules 2011, the competent authority is pleased to Rajjar District Charsadda with immediate effect.  
The DEO (F) Charsadda already stopped her salary due to having fake appointment letter.

(Ulfat Begum)  
District Education Officer (Female)  
Charsadda

Endst No. 1508-15 Dated 19.07.2019

Copy forwarded for information and n/action to the:

1. PA to the Director E&S Education Khyber Pakhtunkhwa, Peshawar.
2. PA to the Duty Commissioner Charsadda.
3. District Monitoring Officer E&SE Charsadda.
4. District Accounts Officers Charsadda.
5. The Concerned DDEO Female Charsadda with the request to recovered the salaries and deposit in Gvt Treasury through challan under intimation to this office.
6. Head Teacher GGHS Rajjar Charsadda.
7. Mst Nazma Ali Ex CT Charsadda.
8. ADO Estab. Primary Local Office.
9. The Anti-Corruption department Charsadda may be request to register FIR against the said fake teacher for compliance the Enquiry recommendation.
10. Master File.

District Education Officer (Female)  
Charsadda

**ATTESTED**



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MADE BY ITS  
LEGIBLE COPY  
INQUIRY REPORT

TERMS OF REFERENCE

The Director E&SE Khyber Pakhtunkhwa Peshawar was pleased to nominate the undersigned as the inquiry officer under the Notification Endst. No. 9749-51/F.NO14(F) Appeal Charsadda Peshawar dated the 26/10/2018 (Annexure-I).

BACKGROUND:

The DEO (F) Charsadda requested the worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa vide Letter No. 19585 Dated 5/10/2018 to order an inquiry regarding the transfer of Mst. Nazma Ali CT from Battagram to Charsadda (Annexure-II).

PROCEDURE:

After intimating vide Letter No. 2048 Dated: 09/11/18 (Annexure-III), the undersigned visited the Office of the District Education Female, Charsadda on 14/11/2018. She perused and collected all the relevant available record. During the visit of DEO(F) office, Mst. Nazma was also present (Annexure-IV). She submitted her written statement on the spot.  
- Letter No. 195 Dated 1/11/18 and Letter No. 2048 Dated 9/11/18 (Annexure-V & VI) were sent to the District Education Officer (F) Battagram requesting him to direct the dealing hands to attend the office of the undersigned along with all relevant record. He attended the office however, he provided incomplete record. The DEO(F) Battagram was again requested vide Letter No. 8609 dated 31/1/2019 (Annexure-VII) and was telephonically contacted as well but the requisite information was not provided.  
- The Deputy Director (F) Establishment Directorate of E&SE was requested vide Letter No. 193 Dated 01/11/2018 (Annexure-VIII) to verify the transfer order of Mst. Nazma from Battagram to Charsadda. In response, vide Letter No. 603/F.No.14/Appeal Charsadda Dated Peshawar the 21/12/2018 (Annexure-IX) it was replied that the file had been misplaced during shifting of office and the dispatch/issue register was in the custody of NAB and they did not possess any record pertaining to the transfer in question.  
- The existing dealing assistant of Deputy Director (F) Establishment Directorate of E&SE Mr. Muhammad Zabir was asked vide Letter No. 198 Dated 1/1/2019 (Annexure-X) to record statement regarding misplacement of the required file. In reply, he said that the dealing assistant in 2013, was Mr. Munir and that he would be in a better position to respond (Annexure-XI). Therefore, Mr. Munir Khan, the then dealing assistant was asked vide No 794 Dated 3/1/19 (Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education. (Annexure-XIII). So, in those conditions the

*[Handwritten Signature]*  
District Education Officer  
Female, Charsadda

ATTESTED  
*[Signature]*  
Assistant Secretary  
Elementary and Secondary Education  
Peshawar

*[Handwritten Signature]*

ATTESTED

**INQUIRY REPORT****TERMS OF REFERENCE**

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**PROCEDURE:**

1. After intimating vide letter No 2048 dated 09.11.2018 (Annexure-III), the undersigned visited the office of the District Education Female, Charsadda on 14.11.2018. She perused and collected all the relevant available record. During the visit of DEO F office, Mst Nazma was also present (Annexure-IV), She submitted her written statement on the spot.
2. Letter No 195 Dated 01.11.18 and Letter no. 2048 Dated 09.11.18 (Annexure-V & VI) were sent to the District Education Officer (F) Battagram requesting him to direct the dealing hands to attend the office of the undersigned along with all relevant record. He attended the office however, he provided incomplete record. The DEO (F) Battagram was again requested vide Letter No 8609 dated 31.01.2019 (Annexure-VII) and was telephonically contacted as well but the requisite information was not provided.
3. The Deputy Director (F) Establishment Directorate of E&SE was requested vide letter No 193 dated 01.11.2018 (Annexure VIII) to verify the transfer order of Mst Nazma from battagram to Charsadda. In response, vide letter No 633/F No. 14/Appeal Charsadda dated Peshawar the 21.12.2018 (Annexure-IX) it was replied that the file had been misplaced during shifting of office and record pertaining to the transfer in question.
4. The existing dealing assistant of Deputy Director (F) Establishment Directorate of E&SE Mr Muhammad Zabir was asked vide letter No 580 dated 1.1.2019 (Annexure-X to record statement regarding misplacement of the required file. In reply, he said that the dealing assistant in 2013 was Mr Munir and that he would be in a better position to response (Annexure-XI). Therefore, Mr Munir Khan, the then dealing assistant was asked vide No. 794 Dated 3.1.19 (Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education (Annexure-XIII). So, in those conditions the

**ATTESTED**

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WOMEN'S EMPOWERMENT

Enquiry officer was unable to retrieve any official record or documents despite issuing official letters.

Letter to District Education Officer Male Swat was sent vide No. 5265 Dated 22/11/2018 (Annexure-XIV) to direct Mr. Khadim Shah the then Suptt Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as he had personally visited the DEO Office Battagram to verify the documents of Mst. Nazma. Statement of Mr. Khadim Shah was recorded (Annexure-XV).  
Studied the case thoroughly.  
Reported findings accordingly.

SUMMARY OF THE STATEMENT OF Mst NAZMA

Detailed verbal discussion in the office of District Education Officer, Mst Nazma Ali gave statement in the presence of DEO (F). She stated that she was appointed in GGHS District - Battagram, vide Endst No5509-14/FB/AE-II/Appointment/2010 dated 1/2011 (Annexure-XVI) as a CT without any written test. As CT post was not lying in GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office order No 1385-89 Dated 31/1/2011 (Annexure-XVII). Her husband was posted in office Battagram as a class IV. He belonged to District Charsadda. After four months he was on medical leave but she could not provide any record of her medical leave to the school. According to her statement she was transferred to Charsadda vide endorsement No. A-167CT2013 Dated Peshawar the 1/3/2013. She provided charge report in GGMS Banian relieving certificate from GGHS Banian, Application for transfer, transfer order, register of GGMS Shamlai, pay slip along with her written statement (Annexure A, B, C, D, E, F, G). Surprisingly pay slip which she provided name of the school is GHS

SUMMARY OF THE STATEMENT OF MR. MUHAMMAD JAMIL SUPERINTENDENT BATTAGRAM.

Muhammad Jamil superintendent office of the DEO (F) Battagram visited the office of the undersigned twice on 28/11/2018 and 6/12/2018. He provided incomplete record and only provided appointment order of 2011 (Annexure-XIX). Photocopy of statements of employees of GGHS Banian and GGMS Shamlae (upgraded to high school in June 2011) of DEO (F) Battagram attendance register of GGMS Shamlae (Annexure-XX, a, b, c) and the statement that the name of Mst Nazma could neither be found in the transfer order nor in the attendance register (Annexure-XXI). A Written statement given by the undersigned of GGHS Shamlae saying that, as per the attendance register no teacher on the name was found. DEO female in his letter also mentioned that the name of Mst. Nazma was not found in any school of Battagram. He provided minutes of DSC meeting in which

*Muz*  
District Education Officer  
Female Charsadda

*Reference of*

ATTESTED

Inquiry officer was unable to retrieve any official record or documents despite issuing official letters.

5. Letter to District Education Officer Male Swat was sent vide No. 5265 dated 22.11.2018 (Annexure-XIV) to direct Mr Khadim Shah the then Suptt Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as he had personally visited the DEO Office Battagram to verify the documents of Mst Nazma Ali. Statement of Mr Khadim Shah was recorded (Annexure-XV)
6. Studied the case thoroughly.
7. Reported findings accordingly.

**SUMMARY OF THE STATEMENT OF MST NAZMA**

(sic) assailed verbal discussion in the office of District Education Officer, Mst Nazma Ali gave her statement in the presence of DEO(F). she stated that she was appointed in GGHS Banian district Battagram, vide Endst No. 5509-14/FB/AE-II/Appointment /2010 dated 21.01.2011 (Annexure XVI) as a CT without any written test. As CT post was not lying in GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office Order advertisement No. 1385-89 dated 31.01.2011 (Annexure XVII). Her husband was posted in \_\_\_\_\_ office Battagram as a Class IV. He belonged to District Charsadda. After four months applied for medical leave but she could not provide any record of Her Medical leave to the undersigned. According to her statement she was transferred to Charsadda vide endorsement No. \_\_\_\_\_ A-167CT2013 Dated Peshawar the 01.03.2013. She provided charge report in GGMS Banian relieving certificate from GGHS Banian, Application for transfer, transfer order, attendance register of GGMS Shamlai, pay slip along with her written statement (Annexure XVIII). Surprisingly pay slip which she provided name of the school is GHS \_\_\_\_\_.

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Mr Muhammad Jamil Superintendent office of the DEO (F) Battagram visited the office of the undersigned twice on 28.11.2018 and 06.12.2018. He provided incomplete record and only (sic) appointment order of 2011 (Annexure XIX) Photocopy of statements of teachers of GGHS Banian and GGMS Shamlae (upgraded to high school in June ) DEO (F) Battagram attendance register of GGMS Shamlae (Annexure XX, a,b, c, ) (sic) the statement that the name of Mst Nazma could neither be found in the (sic) nor in the attendance register (Annexure XXI). A Written statement given by the head Mistress of GGHS Shamlae saying that, as per the attendance register no teacher on the attendance was found. DEO female in his letter also mentioned that the name of Mst Nazma (sic) found in any school of Battagram. He provided minutes of DSC meeting in which

**ATTESTED**

COPIES  
ORIGINAL COPY

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total 12 vacant posts, 9 posts were recommended/approved to be filled from batch wise list (a) and 3 from open merit, at the ratio of 75% and 25% as per policy that time in vogue. However, 10 candidates were appointed in batch wise quota and 3 from open merit, total 13 appointments were made instead of 12. In the appointment order provided by Mst. Nazma Ali 11 candidates were enlisted. Alarming, the appointment file was incomplete and a transfer file of that period was missing in the office of the DEO Battagram. (Annexure XXII a, b)

SUMMARY OF THE STATEMENT OF MR. KHADIM SHAH EX-SUPERINTENDENT CHARSADDA:

Mr. Khadim Shah recorded his statement and clarified that he visited office of the DEO (F) Battagram to verify the service documents of Mst. Nazma by hand on 14/4/2013 and checked all the records but due to absence of DEO (F) Battagram on that day he left the record for signatures/verification. Later on, the verification was sent to DEO (F) Charsadda vide letter no 74/verification Dated 17/4/2013 through post/ Mail. (Annexure-XXIII). He also provided a finance certificate signed by the then DDEO Battagram, Mr. Fida Muhammad (Annexure-XXIV). It is astonishing that all the record was also signed by the same DDEO but not provided by hand and sent that through post.

ORIGIN OF THE ISSUE:

During visit of DEO (F) Office Charsadda, the DEO female told that she requested for the inquiry after the anticorruption Charsadda sent a letter to her office on 25/9/17, regarding detail of the teachers who were transferred from other districts and FATA from 2006 onward. (Annexure-XXV) Hence, a letter for the verification of service documents was again sent vide letter no 7972/Dated 21/10/2017 to DEO (F) Battagram. (Annexure-XXVI). Reminder for verification was sent vide endorsement no 18919 dated 3/2/2018. (Annexure-XXVII). The documents were received duly verified, vide letter no 5390 Dated Battagram the 9/3/2018 bearing signatures like the then DEO (F) Battagram MST Rehana Yasmin. (Annexure-XXVIII). DEO Charsadda was worried about fake appointments so, she sent the documents to the DEO (F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) Battagram in which she told that not only the verification letter was fake but also the dispatch number on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted that District accounts office, Battagram verified her LPC vide letter no 174 DAO/BM Dated 14/4/2013 (Annexure-XXX a, b).

Findings

From the available record of both the DEO (F) Offices, statement of all the people/officials concerned, it is clear that:  
• The appointment order is fake and bogus.

*Shahid*

*Muzna*  
District Education Officer  
(Female) Charsadda

RECEIVED  
District Education Officer  
(Female) Charsadda

2. Always quote Case No. While making any correspondence.

ATTESTED

Total 12 vacant posts, 9 posts were recommended / approved to be filled from batch wise list (sic) and 3 from open merit, at the ration of 75% and 25% as per policy that time in vogue however, no candidates were appointed in batch wise quota and 3 from open merit, total 13 appointments were made instead of 12. In the appointment order provided by Mst Nazma Ali. If candidates were enlisted. Alarminglly, the appointment file was incomplete and a transfer file of the period was missing in the office of the DEO Battagram. (Annexure XXII a, b)

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During visit of DEO (F) Office Charsadda, the DEO female told that she requested for the enquiry after the anti-corruption Charsadda sent a letter to her office on 25.09.17, regarding detail of the teachers who were transferred from other districts and FATA from 2006 onward. (Annexure XXV), Hence a letter for the verification of service documents was again sent vide letter No 7972/Dated 21.10.2017 to DEO (F) battagram. (Annexure XXVI). Reminder for verification was sent vide endorsement No 18919 dated 03.02.2018. (Annexure XXVII). The documents were received duly verified; vide letter no 5390 dated Battagram the 09.03.2018 bearings signatures like the then DEO (F) Battagram Mst Rehana Yasmin (Annexure XXVIII). The DEO Charsadda was worried about fake appointments so, she sent the documents to the DEO(F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) Battagram in which she told that not only the verification letter was fake but also the dispatch member on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted the District Accounts Office, Battagram verified her LPC vide letter No 174 DAO/BM dated 02.4.2013. (Annexure-XXX a, b)

**Findings:**

From the available record of both the DEO (F) Offices, statement of all the people / officials concerned, it is clear that:

- The appointment order is fake and bogus.

**ATTESTED**

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- Teacher attendance register of GGMS Shumfac revealed that she had never been a part of that school.
- The salary record was not traceable from Battagram.
- Transfer order issued by the directorate was also not confirmed as the file was missing in the directorate.
- The academic documents provided were also not verified by the institutions concerned.
- Verification of all document also proved to be fake.
- The ministerial staff in the female DEO office are responsible for the loss or non-production of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

**RECOMMENDATIONS**

- The fake appointment order produced by Mst. Nazma may be treated as of no effect and be treated as null and void ab initio. The DEO (F) Charsadda may register a FIR in the Anti-Corruption against the said teacher.
- All amount taken as salary may be recovered and refund to government exchequer.
- An in-depth inquiry may be initiated against the Ministerial staff of DEO office Battagram and establishment branch in Directorate for their casual handling of the office record and squandering valuable official record pertaining to the appointment /transfer and they should then be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
- DEO female office Battagram may be directed to bring her house in order, recover the official record of her office and secure them from loss.

The report is submitted for perusal and further necessary action under the rules, please.

*Nahed*  
12/24/19

Miss Nahed Anjum

Deputy Director

E&SE Khyber Pakhtunkhwa

*[Signature]*  
Director Education Office  
Female, Charsadda

*[Signature]*

**ATTESTED**

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**RECOMMENDATIONS:**

1. The fake appointment order produced by Mst. Nazma may be treated as of no effect and be treated as null and void ab initio. The DEO (F) Charsadda may register a FIR in the Anti-Corruption against the said teacher.
2. All amount taken as salary may be recovered and refund to government exchequer.
3. An in-depth inquiry may be initiated against the Ministerial Staff of DEo Office Battagram and establishment branch in Directorate for their casual handling of the office record and squandering valuable officials record pertaining to the appointment / transfer and they should be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011.
4. DEO Female Office Battagram may be directed to bring her house in order, recover the official record of her office and secure then from loss.
5. The report is submitted for perusal and further necessary action under the rules, please.

**Miss Naheed Anjum  
Deputy Director  
E&SE Khyber Pakhtunkhwa**

**ATTESTED**





PLEASE DO NOT WRITE  
LEGIBLE COPY

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
CHARSADDA

No 100/23 dated 22/11/2017

Office order

In the light of inquiries report & court judgments, the appointments of the following teachers are illegal, void ab-initio and against the prescribed rules, therefore the services of the following teachers are hereby dispensed hence they are no more remained teachers.

S.NO	NAME OF TEACHERS	DESIGNATION	SCHOOL NAMES	REMARKS
01	Zia Gul	DM	GGMS Hamood mian dheri Charsadda	Through court Judgment w/p no 2028/2017, enquiry report.
02	Nighat seema	AT	GGHS Dado killi charsadda	Through verification vide letter No 312 dated 18-01-2017
03	Hasrat PET	PET	GGHS helonji charsadda	OC
04	Sania wali	SST	GGHS Daudat pura	Vide letter No, 7603 dated 13-10-2017 send by the DEO (F) to director, response vide letter No, 2630 dated 13-10-2017
05	Shama begum	PST	GGMS pegham kornora charsadda	Through judgment w/p no.4735-p/2016 & enquiry report

DISTRICT EDUCATION OFFICER  
FEMALE CHARSADDA

Encl N \_\_\_\_\_ dated \_\_\_\_\_ 2017

- Copy for information
- (1) Registrar Judicial Peshawar high court.
  - (2) Director E&SE kpk peshawar.
  - (3) Official concerned.

DISTRICT EDUCATION OFFICER  
FEMALE CHARSADDA

*Recd. on 2/12/2017.*  
*Fazal*  
*Recives dated 2/12/17 at 01:10 pm*

CERTIFIED TO BE A TRUE COPY

For the District Education Officer  
Advocate General's Office  
Supreme Court of Pakistan

*Fazal*

ATTESTED

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
CHARSADDA**

**OFFICE ORDER**

In the light of inquiries report & Court Judgments, the appointments of the following teachers are illegal, void ab initio and against the prescribed rules, therefore the services of the following teachers are hereby dispensed, hence they are no more remained teachers.

S No	Name of teachers	Designation	School Names	Remarks
01	Zia Gul	DM	GGMS Hameed Man Dheri Charsadda	Through court judgment w/p No. 2028/2017, enquiry report
02	Nighat Seema	AT	GGHS Dadi Killi Charasadda	Through verification vide letter No 312 dated 18.01.2017
03	Hasrat PET	PET	GGHS Turlan Charsadda	DG
04	Sania Wali	SST	GGHS Daulat Pura	Vide letter BNo 7603 dated 13.10.2017 send by the DEO (F) to director, response vide letter No 2630 dated 13.10.2017
05	Shama Begum	PST	GGHS Pegham Koroona Charsadda	Through Judgment w/p No. 4738-P/2016 & enquiry report

**DISTRICT EDUCATION OFFICER  
FEMALE CHARASADDA**

Endst No. \_\_\_\_\_ Dated \_\_\_\_\_ 2017

**Copy for information**

- (1) Registrar Judicial Peshawar High Court.
- (2) Director E&SE KPK Peshawar.
- (3) Official concerned.

**ATTESTED**

**DISTRICT EDUCATION OFFICER  
FEMALE CHARASADDA**

NATURE OF THE INQUIRY:-

In pursuance of the letter of the District Education Officer (Female) Charsadda bearing Endst. No. 4798 dated 22/06/2017 the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar in his capacity as the appellate authority vide Notification No. 2702-03/F.No.56/(F)/Appeal Charsadda dated 28-07-2017 ordered an Inquiry in respect of Mst. Shama Begum PST GGPS Piagham Charsadda to probe the matter with the following TORs.

TERMS OF REFERENCES OF THE INQUIRY:

1. To inquire the 1<sup>st</sup> appointment order of the incumbent.
2. To verify pay slip/LPC/salaries drawn from FATA/AEO concerned.
3. To verify transfer order of the said teacher, made from FATA to district Batagram and then to district Charsadda along with No Objection Certificate from FATA to district Batagram and from district Batagram to district Charsadda.
4. To verify pay slip/LPC/salaries drawn from DAO Batagram and district Charsadda.
5. To check thoroughly the Attendance Register of the relevant school of the teacher concerned.

HISTORY OF THE INQUIRY:

The salary of Mst. Shama Begum PST GGPS Piagham Charsadda had been stopped by the then SDEO (F) Charsadda, Miss Nadia, for the reason that her appointment order and other relevant documents regarding her services were fake as she failed to provide the documents required to SDEO (F) Charsadda asked vide Endst. No. 219 dated 26/08/2014. (Copy of letter is annexed as A).

Mst. Shama Begum PST GGPS Piagham Charsadda instead of providing the requisite documents to the SDEO concerned, knocked at the doors of the Hon'ble Peshawar High Court Peshawar against the decision of the SDEO (F) Charsadda of her stoppage of pay.

MECHANISIM OF THE INQUIRY:

The following procedure was adopted to conduct the inquiry:

1. Both the offices of the Director Education FATA Khyber Agency Warsak road Peshawar and the AEO Khyber Agency Jamrud were visited on 11/08/2017 who had already been intimated by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Notification No. 2702-03/ F.No.56/(F)/Appeal Charsadda dated 28-07-2017.
2. The Inquiry committee was provided with a written detailed statement regarding the TORs, by the AEO Khyber Agency Jamrud bearing Memo No. 546 dated 11-08-2017. (Copy annexed as B)
3. Likewise, the inquiry committee, for the purpose to verify the LPC issued and duly signed by the then AEO Khyber Agency Mr. Hashim Khan Afridi, now Director Education FATA Secretariat Peshawar, visited the office of the Director Education FATA Secretariat Peshawar on 16/08/2017.
4. The Inquiry committee was provided with a written statement from the then AEO Khyber Agency now the Director Education FATA Secretariat Peshawar vide Memo No. Nil dated 16-08-2017. (Copy annexed as C)
5. The Inquiry committee, for the purpose to verify the transfer order bearing Endst: 12085-97/F. No. 103/PTC (F) FATA to Sett: dated 13/04/2011 and subsequent transfer order Endst: No. 3464-69 /F. No. 51/Gen. Transfer (F) dated 07/09/2011, issued by the Director Elementary & Secondary Education NWFP/ Khyber Pakhtunkhwa,

ATTESTED

**NATURE OF THE INQUIRY** In pursuance of letter of the District Education Officer (Female) Charsadda bearing Endst No 4798 dated 22.06.2017 the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar in his capacity as the appellate authority vide notification No. 2702-03/F No. 56/F/Appeal Charsada dated 28.07.2017 ordered an inquiry in respect of Mst Shama Begum PST GGPS Piagham Charsadda to probe the matter with the following TORs.

**TERMS OF REFERENCE OF THE INQUIRY**

1. To inquire the 1<sup>st</sup> appointment order of the incumbent.
2. To verify pay slip /LPC/Salaries drawn from FATA/AEO, concerned.
3. To verify transfer order of the said teacher, made from FATA to district Battagram to district then to district Charsadda along with no Objection certificate from FATA to district Battagram and from Battagram to district Charsadda.
4. To verify pay slip/LPC/salaries drawn from DAO BAtagram and District Charsadda.
5. To check thoroughly the attendance Register of the relevant school of the teacher concerned.

**HISTORY OF THE INQUIRY:**

The salary of Mst Shama Begum PSt GGPS Piagham Charsadda had been stopped by the then SDEO(F) Charsadda, Mis Nadia, for the reason that her appointment order and other relevant documents regarding her services were fake as she failed to provide the documents required to SDEO (F) Charsadda asked vide Endst No. 219 dated 26.08.2014. (Copy of letter is annexure A).

Mst Shama Begum PST GGPS Piagham Charsadda instead of providing the requisite documents to the SDEO concerned, knocked the doors of the Hon'ble Peshawar High Court Peshawar against the decision of SDEO (F) Charsadda of her stoppage of pay.

**MECHANISM OF THE INQUIRY:**

The following procedure was adopted to conduct the inquiry:

1. Both the offices of the Director Education FATA Khyber Agency Warsak Road Peshawar and the AEO Khyber Agency Jamrud were visited on 31.08.2017 who had already been intimated by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Notification No. 2702-03/F No. 56/F/Appeal Charsadda dated 28.07.2017.
2. The inquiry Committee was provided with a written detailed statement regarding the TORs by the AEO Khyber Agency Jamrud bearing memo No 546 dated 11.08.2017. (Copy Annexed as B).
3. Likewise, the inquiry committee, for the purpose to verify the LPC issued and duly signed by the then AEO Khyber Agency Mr Hashim Khan Afridi, now Director Education FATA Secretariat Peshawar visited the office of the Director Education FATA Secretariat Peshawar on 16.08.2017.
4. The inquiry Committee was provided with a written statement from the then AEO Khyber Agency now the Director Education FATA Secretariat Peshawar vide Memo No. Nil dated 16.08.2017. (Copy Annexed as C)
5. The inquiry Committee, for the purpose of verify the transfer order bearing Endst: 12085-97/F No. 103/PTC (F) to Sett: dated 13.04.2011 and subsequent transfer order Endst No. 3464-69/F No. 51/Gen Transfer (F) dated 07.09.2011, issued by the Director Elementary & Secondary Education NWFP / Khyber Pakhtunkhwa

**ATTESTED**

- Peshawar visited the office of the Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar on 22/08/2017 and made a request for the purpose vide letter No. 512/F. No. Inquiry Dated: 22/08/2017. (Copy annexed as D)
6. The inquiry committee was provided with a detailed written statement by the Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar, bearing Memo No. 4588/F.No. 56(F)/Appeal Charsadda dated 21-05-2017. (Copy annexed as E)

FINDINGS AND CONCLUSION OF THE INQUIRY:

After thorough examination of the available record, detailed written statements of the AEO Khyber, DE FATA, Director Elementary and secondary education KP the inquiry committee furnishes its findings and conclusions as follows.

1. The AEO Khyber Agency Jamrud in his written statement when asked about verification of service documents of Mst. Shama Begum PST GGPS Aka Khel Bara Khyber Agency now PST in GGPS Paghani Charsadda furnished to the inquiry committee has declared that:
  - (i) The name of the school i.e. GGPS Aka Khel Bara Khyber Agency, where the teacher concerned has been shown as adjusted on her initial recruitment, does neither exist on the grounds of Khyber agency nor in the papers of the record of Khyber Agency education department i.e. in the SNE of AEO office Khyber Agency.
  - (ii) The bogus signature, ridiculously appended to the appointment order of Mst. Shama Begum PST has been resembling to the signature of Ex. AEO Khyber Agency Mr. Dilbar Khan but his period of services has been w.e.f 21/03/2004 to 16/08/2005, as is evident from the AEO display board in the office of AEO.
  - (iii) Mr. Jahngi Khan remained the AEO of Khyber Agency for the period w.e.f 01/04/2003 to 05/08/2003.
  - (iv) The bogus signature appended to the LPC of Mst. Shama Begum PST has been resembling to the signature of Ex. AEO Khyber Agency Mr. Hashiri Khan Afridi which did not match with his specimen signature.
  - (v) No record was available regarding appointment/services/salaries of the teacher concerned in the office of the AEO Khyber Agency.
2. The Director Education FATA Secretariat Peshawar in his written statement has disowned the signature appended to the LPC of the teacher concerned.
3. The Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar in his written statement has disowned the Endst: No(S) and signatures appended to the transfer orders in respect of Mst. Shama Begum PST bearing Endst: 12085-97/F. No. 103/PTC (F) FATA to Settle: dated 13/04/2011 and Endst: No. 3464-69/F. No. 51/Gen. Transfer (F) dated 07/09/2011 and further declared that no record was found regarding her transfer either from FATA to district Batagram or from district Batagram to district Charsadda.
4. During the course of the inquiry proceedings this inquiry committee came across many other anomalies such as:
  - (i) The LPC No. 975 dated 31/05/2011 prepared for the month of May 2011 depicts her basic pay Rs. 3820/- per month which is the minimum/initial of BPS-05 in May 2011.
  - (ii) And the LPC No. 129 dated 31/08/2011 prepared for the month of August 2011 depicts her basic pay Rs. 6200/- per month which is the minimum/initial of BPS-09 in July 2011.
  - (iii) Whereas the page No. 06 of her service book shows her basic pay Rs. 5200/- in May 2011 and then Rs. 8480/- in August 2011 which is the 6<sup>th</sup> stage, which she might deserve only after the passage of six long years.

COMMISSIONER

DEPARTMENT OF  
EDUCATION  
PESHAWAR

ATTESTED

Peshawar visited the office of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar on 22.08.2017 and made a request for the purpose vide letter No. 1012/F No. inquiry Dated 22.08.2017. (Copy annexed as D)

6. The inquiry committee was provided with a detailed written statement by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, bearing Memo No 4588/F. No. 56(F)/Appeal Charsadda dated 21.08.2017. (Copy annexed as E)

**FINDINGS AND CONCLUSION OF THE INQUIRY:**

After thorough examination of the available record, detailed written statements of the AEO Khyber, DE-FATA, Director Elementary and Secondary Education KP the inquiry committee furnishes its findings and conclusion as follows:

1. The AEO Khyber Agency Jamrud in his written statement when asked about verification of service documents of Mst Shama Begum PST GGPS Aka Khel Bara Khyber agency now PST in GGPS Piagham Charsadda furnished to the inquiry committee has declared that:
  - (i) The name of the school i.eGGPS Aka Khel Bara Khyber Agency where the teacher concerned has been shown as adjusted on her initial recruitment, does neither exist on the ground of Khyber Agency nor in the papers of the record of Khyber Agency education department i.e in the SNE of AEO Office Khyber Agency.
  - (ii) The bogus signature ridiculously appended to the appointment order of Mst Shama Begum PST has been resembling to the signature of Ex. AEO Khyber Agency Mr Dilbar Khan but his period of services has been w.e.f 21.03.2004 to 16.08.2005, as is evident from the AEO display board in the office of AEO.
  - (iii) Mr Jhangi Khan remained the AEO of Khyber Agency for the period w.e.f 01.04.2003 to 06.08.2003.
  - (iv) The bogus signature appended to the LPC of Mst Shama Begum PST has been resembling to the signature of Ex.AEO Khyber Agency Mr Hashim Khan Afridi which did not match with his specimen signature.
  - (v) No record was available regarding appointment / services / salaries of the teacher concerned in the office of the AEO Khyber Agency.
    - a. The Director Education FATA Secretariat Peshawar in his written statement has disowned the signature appended to the LPC of the teacher concerned.
2. The Director Education FATA Secretariat Peshawar in his written statement has disowned the signature appended to the LPC of the teacher concerned.
3. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar in his written statement his disowned the Endst No. (S) and signatures appended to the transfer orders in respect of Ms Shama Begum PST bearing AEndst No. 12085-97/F No. 103/PTC (F) FATA to Settle dated 3.04.2011 and Endst No. 3464-69/F No.51/Gen. Transfer (F) dated 07.09.2011 and further declared that no record was found regarding her transfer either from FATA to district Batagram or from district Batagram to district Charsadda.
4. During the course of the inquiry proceedings this inquiry committee came across many other anomalies such as:-
  - (i) The LPC No. 975 dated 31.05.2011 prepared for the month of May 2011 depicts her basic pay Rs. 3820/- per month which is the minimum / initial of BPS-05 in May 2011.
  - (ii) And the LPC No. 129 dated 31.08.2011 prepared for the month of August 2011 depicts her basic pay Rs. 6200/- per month which is minimum / initial of BPS-09 in July 2011.
  - (iii) Whereas the page No 06 of her service book shows her basic pay Rs. 5200/- in May 2011 and then Rs. 8480/- in August 2011 which is the 6<sup>th</sup> stage, which she might deserve only after the passage of six long years.


**TESTED**


- (61)
5. Looking for her own interest to validate her fake services, the teacher concerned, driving the nail right, ultimately succeeded in her fraudulent plan, when in pursuance of the Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar Endst: NO. 3464-69/F. No. 51/Gen. Transfer. (F) dated 07/09/2011 she was transferred from district Batagram to GGPS Palgham district Charsadda where her pay has been started and she has claimed and drawn her all undue and illegal arrears w.e.f 01/09/2011 to 31/05/2011 on the basis of fake documents as evident from the page No. 07 of her service book and pay roll for the month of June 2011.
  6. She has been paid normally up to 30/06/2014 till her pay has been stopped by the then SDEO (F) Charsadda for the doubt of fakeness of her basic service documents.
  7. The worthwhile step of stoppage of monthly salaries of Mst. Shama Begum PST by SDEO Charsadda is worth commendable and appreciable. Had the DEO (F) Charsadda lodged an FIR against the bogus teacher in the police station concerned after conducting an inquiry in the instant case, for the reason that Mst. Shama Begum PST is not a civil servant to be proceeded under any rules of law meant for disciplinary proceedings against a civil servant?
  8. The basic documents which determine the entire services as fair/fake of a teacher are his/her first appointment order, medical report, LPCs, entries in the service book, transfer orders and other similar record and in the case of the teacher concerned it has been proved beyond any doubt that all these documents were found fake and bogus. She has been inducted in the educational system with the connivance of the active MAFIA.
  9. The committee is of the opinion that further investigation in the instant case is needed in term of reference to fix the responsibility upon her facilitators who were the essential part of this fraudulent plan other than the teacher concerned which may need a detailed inquiry.


**RECOMMENDATIONS OF THE INQUIRY:**

In view of the above submissions it is recommended that:

1. Her pay may not be released in any circumstances thereto.
2. All the salaries drawn by her may immediately be recovered from her.
3. An FIR may be lodged against her in the police station concerned.
4. A detailed inquiry is recommended for the purpose to point out and take the MAFIA persons to task who facilitated her.

  
 (SAFDAR KHAN)  
 PRINCIPAL BPS-18  
 GOVT. SHAHEED SAADUR REHMAN HIGH SCHOOL  
 (GULSHAN-REHMAN COLONY) PESHAWAR  
 (Inquiry Officer)

  
 (MUHAMMAD IQBAL)  
 PRINCIPAL BPS-19  
 GOVT. HIGH SCHOOL  
 BADHBER PESHAWAR  
 (Chairman Inquiry Committee)

  
 Principal  
 Government High School  
 Supreme Court Road, Peshawar

**ATTESTED**

5. Looking for her own interest to validate her fake services, the teacher concerned during the nail aright, ultimately succeeded in her fraudulent plan, when in pursuance of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Endst No. 3464-69/F No. 51/Gen Transfer (F) dated 07.09.2011 site was transferred from district Batagram to GGPS Piagham district Charsadda where her pay has been started and she has claimed and drawn her all undue and illegal arrears w.e.f 01.09.2011 to 31.05.2011 on the basis of fake documents as evident from the page nO 07 of her service book and pay roll for the month of June 2011.
6. She has been paid normally up to 30.06.2014 till her pay has been stopped by the then SDEO (F) Charsadda for the doubt of fakeness of her basic service documents.
7. The worthwhile step of stoppage of monthly salaries of MSt Sama Begum PST by SDEO Charsadda is worth commendable and appreciable. Had the DEO (F) Charsadda lodged an FIR against the bogus teacher in the police station concerned after conducting an Inquiry in the instant case, for the reason that Mst Shama Begum PST is not a civil servant to be proceeded under any rules of law mean for disciplinary proceedings against the a Civil servant ?
8. The basic documents which determine the entire services as fair / fake of a teacher are his / her first appointment order, medical report, LPCs entries in the service book, transfer orders and other similar record and in the case of the teacher concerned it has been proved beyond any doubt that all these documents were found fake and bogus. She has been inducted in the educational system with the connivance of the active MAFIA.
9. The committee is of the opinion that further investigation in the instant case is needed in term of reference to fix the responsibility upon her facilitators who were the essential part of this fraudulent plan other than the teacher concerned which may need a detailed inquiry.

**RECOMMENDATIONS OF THE INQUIRY:**

In view of the above submissions it is recommended that:

1. Her pay may not be released in any circumstances thereto.
2. All the salaries drawn by her may immediately be recovered from her.
3. An FIR may be lodged against her in the police station concerned.
4. A detailed Inquiry is recommended for the purpose to point out and take the MAFIA persons to task who facilitated her.

**ATTESTED**



**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) BATTAGRAM**

**APPOINTMENT ORDER**

Consequent upon the approval of competent authority that Mst Nighat Seema D/o Raz Muhammad is hereby appointed as AT by Govt Girls Middle School, Gidri Khair Abad Battagram in BPS 09 against vacant post plus usual allowances as admissible under the rule in the interest of Public service with effect from the date of her taking over charge.

**TERMS AND CONDITIONS:**

1. She will be governed such rules & regulations as may be prescribed by the Govt from time to time for category of the Govt Servant to which he belong.
2. In case of resignation prior notice of one month should be given by the official concerned otherwise one month pay allowances will be forfeited to lieu thereof. Her original certificate / degrees should be checked and verified from the concerned BISE/ University concerned etc before handing taking over charge by the DDO concerned through Agency Education Officer concerned.
3. She declaration of assets should be obtained and kept in safe custody by the DDO concerned .
4. She take over charge of her post within one month after the issue of this appointment order.
5. Charge reports should be sent to all concerned.
6. No TA/DA etc is allowed.

**EXECUTIVE DISTRICT OFFICER  
ELE&SECY EDU BATTAGRAM**

Dated 01.09.2009

Endst No. 3964-70/AT/Estb (F)

Copy forwarded for information & necessary action to the:

1. PS to DCO Battagram
2. District Account Officer concerned.
3. Distt Officer Female concerned.
4. Candidate concerned
5. Personal file

**DISTRICT OFFICER (FEMALE)  
ELE&SECY EDU BATTAGRAM**

**ATTESTED**

PLEASE SEE  
ORIGINAL COPY

63

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR.**

**OFFICE ORDER**

Consequent upon ban relaxation by the competent authority, Mst. Nighat Seemil A.P. CGMS Gude, Khairabad District, Hattaga-6 is hereby transferred/adjusted against the vacant post of (AT) at CGMS Amir Abad-Dakki, District Charsadda on her own pay & BPS in the interest of public service with effect from the date of her coming over charge.

- Note:-
1. Charge report should be submitted to all concerned.
  2. No TA/DA etc are allowed.
  3. The EDO concerned is directed to check her original service documents before making payment of salary.
  4. Her Seniority will be determined as per rules/policy.

**DIRECTOR  
ELEMENTARY & SECY. EDUCATION  
KHYBER PAKHTUNKHWA.**

Order No. 1766-71 / P.No.1677 Vol-5 Translat (J.K.P.) Dated Pesh: the 16/11/2012

Copy of the above is to the:-

1. Executive District Officer (E&SE) Battagram & Charsadda.
2. District Accounts Officers Battagram & Charsadda.
3. Teacher concerned.
4. Headmaster concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. M.F.O.

*[Signature]*  
 DISTRICT OFFICER (E&SE)  
 KHYBER PAKHTUNKHWA  
 PESHAWAR

*[Signature]*  
 Deputy Director (E&SE)  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

*Missed*

*Relami*

*[Signature]*

ORIGINAL & TRUE COPY

**ATTESTED**

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER**  
**PAKHTUNKHWA**

**OFFICE ORDER**

Consequent upon the approval of the competent authority Mst Nighat Seema of GGMS Gidr Khairabad District Hangu is hereby transferred / adjusted against the vacant post of AT at GGMS Amir Abad Dakki District Charsadda on his own pay and BPS in the interest of Public service with effect from the date of his taking over charge.

Note:-

1. Charge report should be sent to all concerned.
2. NO TA/DA etc are allowed.
3. The DEO (Female) Charsadda is directed to check all service documents before the release of pay.
4. Her seniority will be determined as per rules / policy.

**Director**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa, Peshawar**

Endst No. 1766-71/F No. 16/Vol5 Transfer(F) KP Dated Peshawar the 16.11.2012

Copy for information to the:

1. Executive District Officer (E&S) Battagram Charsadda
2. District Accounts Officer Charsadda / battagram.
3. Principal concerned.
4. Teacher concerned
5. PA to Director Local Directorate
6. M/ File.

**Deputy Director (Estb)**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa, Peshawar**

**ATTESTED**

(84) 12

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) CHARSADDA  
OFFICE ORDER

Mstt: Nighat Seema AT GGMS Gidri Khair Abad District Bannagram under transferred to GGMS Amir Ahad Dhalkki is hereby posted at GGHS Dado Khil against the vacant post AT on her own pay & grade in the interest of public service with immediate effect.

Note:-

1. No TA/DA is allowed
2. Charge report should be submitted to all concerned.

(ATTA ULLAH KHAN)  
EXECUTIVE DISTRICT OFFICER  
E&SE CHARSADDA

Order No. 2486-90 Dated Charsadda the 4/12/12

- Copy for Information & Necessary action to the:
1. District Account Office Charsadda
  2. Head Mistress Concerned
  3. Accountant Local Office
  4. ADO B&A/Suptt: Local Office
  5. Official Concerned
  6. Office File

*[Signature]*  
EXECUTIVE DISTRICT OFFICER  
E&SE CHARSADDA

*Accepted*

CERTIFIED TO THE ORIGINAL

Field Officer  
District Office  
Supervisor

**ATTESTED**

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) CHARSADDA**

**OFFICE ORDER**

Mst Nighat Seema AT GGMS Gidri Khairabad District Barragram under transferred to GGMS Amir Abad Dhakki is hereby posted at GGHS Dado Killi against the vacant post AT on her own Pay & grade in the interest of public service with immediate effect.

Note:-

1. NO TA/DA etc are allowed.
2. Charge report should be submitted to all concerned.

**ATTA ULLAH KHAN  
EXECUTIVE DISTRICT OFFICER  
E&SE CHARSADDA**

Endst No. 2486-90

Dated Charsadda the 04.12.2012

Copy for information to the:

1. District Accounts Officer Charsadda
2. Head Mistress concerned
3. Accountant Local Office
4. ADO B&A./Supdt: Local Office.
5. Official concerned
6. Office File.

**EXECUTIVE DISTRICT OFFICER  
E&SE CHARSADDA**

**ATTESTED**

(65)

محضور جناب سیکرٹری ایجوکیشن صاحب خیبر پختونخواہ پشاور

محکمانہ اپیل اور درخواست

گزارش ہے کہ میری تعیناتی بطور (A.T (BPS-9) گورنمنٹ گرلز ہائی اسکول، گدڑی، خیبر  
آباد، ضلع بگرام میں بروئے آرڈر نمبر 01.09.2009 مورخہ 3964-70/AB/Estb(F) کو  
ہوئی۔ بعد میں میرا تبادلہ بروئے چھٹی نمبر 1766-71/E.No.167/Vol-5/Transfer(F)K.P  
مورخہ 16/11/2012 گورنمنٹ گرلز ہائی اسکول، حامر آباد، ڈھکی، ضلع چارسدہ، کیا گیا جس کے بعد مجھے  
گورنمنٹ گرلز ہائی اسکول، دادو کٹے، ضلع چارسدہ بروئے چھٹی نمبر 2486-90 مورخہ 04.12.2012 کو  
تعینات کیا گیا۔ ابھی حال ہی میں مجھے ڈسٹرکٹ ایجوکیشن آفیسر (نیمیل)، چارسدہ نے بروئے چھٹی نمبر  
10643 مورخہ 22.11.2017 کو نوکری سے برخاست کیا گیا جس میں چھٹی نمبر 312 مورخہ  
18.01.2017 کا حوالہ دیا گیا ہے۔ مجھے سٹے کا سونپا دیا گیا ہے اور نہ ہی کوئی مناسب آئوٹری ہوئی ہے۔  
میری تعیناتی بین قانون کے مطابق ہونے اور بعد از ضروری قانونی لوازمات مجھے بطور A.T تعینات کیا گیا  
تھا۔ میری کوالیفیکیشن مذکورہ پوسٹ کے عین مطابق ہے، میرے تعلیمی اسناد کی باقاعدہ تصدیق کی گئی ہے اور دیگر  
دستاویزات کی تصدیق بھی محکمہ تعلیم نے کی ہے جو درست و صحیح ثابت ہوئے ہیں، مذکورہ تمام کاغذات درخواست  
لذا کے ساتھ لف کئے جا رہے ہیں۔

لہذا میری آپ حضور سے استدعا ہے کہ حکم برخواستگی / چھٹی نمبر 10643،  
مورخہ 22.11.2017 کو منسوخ فرما کر مجھے اپنے پوسٹ پر بحال کیا جائے۔

غرضی

نگہت سید ولد راز محمد

سٹاکن نور بہار کالونی نمبر 1، چارسدہ۔ (سائلہ)

موبائل نمبر: 0321-9884189

18/11/17

Handwritten signature and stamp area.

ATTESTED

BB

ANNEXURE B



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM

(Phone # 0997-310460) E-mail: deimisfbattagram@yahoo.com

No. 3046 -/Primary/2019/

Dated: 16/07/2019

To: The-Director Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.

Subject: SUBMISSION OF REPORT IN RESPECT OF FAKE EMPLOYEES

Memo Kindly refer to the subject noted above it is stated that all the record in this office/school have been checked and no record found in respect of Mst Zia Gul DM appeal No. 550/2018, Mst. Nighat Seema AT GGMS Khairabad Appeal No. 1380/2018 and Mst Shama Begum PST GGPS Paimal Sharqef, it is concluded that these teachers have never been employed in the strength of this office.

The report is hereby submitted for onward submission.

[Signature] District Education Officer (F) Battagram

Endstt No. As above

Copy for information to the:-

- 1- Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
2- Account-General Khyber Pakhtunkhwa-Peshawar
3- District General Officer Battagram with the same request.
4- Master file.

District Education Officer (F) Battagram

Handwritten signature and checkmark

CERTIFIED TO BE TRUE COPY

Formal stamp of the District Education Officer

ATTESTED

Large handwritten signature

legible copy

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**BETTER COPY OF PAGE NO.  
IN THE COURT OF HAMID KAMAL, JUDICIAL  
MAGISTRATE-IV, CHARSADDA**

Inquiry No, 112 dated 21.09.2017 through writ petition  
No.2028-P/2007.

Statement of Adnan S/O Raz Muhammad R/O saeed Bagh Station  
Koroona, Charsadda, Tehsil & District charsadda u/s 164 Cr. P.C  
on oath.

Stated that Mst. Nighat Seema female teacher (AT) is my  
sister. After passing her matric examination and she continued her  
study in Madrassa Ayisha Lilbanat which is registered with Wifaqul  
Madaras and obtained her Shuhadat-e-Anila degree which is equal  
to Master degree in Islamiat. After education, she and my father  
were search of government sevice, when my father met with one  
Ameen Clerk at Government High school No.01 Peshawar, who took  
5,80,000/- from my father for getting employment for my sister in  
education department, who handed over employment order No.  
3964-70 dated 01.09.2009 to my father for appointment at as AT at  
District Battagram and then transferred her to District charsadda  
Vide transfer order No.1766-7 dated 16.11.2012 and after that my  
sister was performing her duties as AT teacher in Government  
Middle School Dadu killy, which is now upgard High school. As all  
the above dealing was made in my presence, therefore, I know  
about the fact, in proof thereof I produce a photostate chit in which  
all the detail is mentioned and bears my father's signature. Now my  
father is dead and through this inquiry I came to know that the  
above said Ameen Clerk has committed fraud with us and handed  
over to us a bogus, and fake appointment & transfer order. As other  
person/staff was also involed in the said fraud, therefore, I charge  
the clerk Ameen alongwith other staff members and prayed for  
justice

XX... Nil opportunity given.

RO & AC

03.10.2017

Adnan

NIC No 17101-5729337-5

(Hamid Kamal)  
Judicial Magistrate-IV  
Charsadda

*Adnan*  
District Education Officer  
Charsadda

ATTESTED



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OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) BATAGRAM

APPOINTMENT  
Consequent upon the Approval of the District Selection Committee, Batagram the following DM Female trained candidates are hereby appointed against the vacant post in BPS NO-09. Plus usual allowances admissible under the rules @ 25% in the schools noted against each in the interest of public service with effect from the date of their taking over charge on the terms & conditions mentioned below:-

S.No	Name of Candidate	Father's Name	Address	Place of Posting	Remarks	
1	Pazia Rashid	Abdul Rashid	Khawan	Mansehra	GGMS Gian Khair Abad	Against V/Post
2	Zia Gul	Gul Pasand	Charadda	Charadda	GGMS Thakot	Against V/Post
3	Bushra Anwar	Mohammad Anwar	Khawan	Mansehra	GGMS Shingil Pevan	Against V/Post

- Terms & Conditions.**
- Charge reports should be submitted to all concerned.
  - They are entitled to get all benefits as admissible under the rules in civil servant Act except pension. They should however be entitled to receive such amount contributed by them toward the contributory provident fund along with contribution made by the provisional government in the said fund in the prescribed manner. Provided further that in the event of death of civil servant whether before or after retirement their families should be entitled to receive the said amount if it has already not been received by the concerned.
  - Their services will be liable to termination on one-month notice from either side. In case of resignation without notice.
  - Her one month pay shall be tendered to the Govt.
  - The candidate are required to produce Age and Health certificate from the Medical. Supdt: DHQ Hospital Batagram. (Only for fresh candidate).
  - The candidates should join their posts within seven days of the issue of this order. Otherwise appointment order will be cancelled.
  - The Appointment will get salaries against the sanctioned posts in the Budget.
  - They will paid salaries after verification of their degree/certificates from the concerned universities/boards/institution on their own expenses by the DDO concerned. Personally/by hand verification will not be acceptable.

(Mukhtar Ahmad Swati)  
Executive District Officer  
Schools & Literacy Batagram.

Encl: No. 3505-07 /EB/AE-II/APPTT  
Copy forwarded for information & necessary action to the:-  
Batagram the 14/10/06.

- District Coordination Officer Batagram.
- I/C Head Master of Govt. High/Middle Schools concerned.
- District Accounts Officer Batagram.
- A.D.O (B & A) Local Office with the remarks to not draw the salaries till the completion of their document's verification.
- I/C Pay Section (Male) Local Office.
- Candidate Concerned.
- Office file.

S.E.T (Gen)  
C.H.S. CHO Khaw

*[Signature]*  
District Officer (Female)  
Schools & Literacy Batagram  
14/10/06

ATTESTED

ATTESTED

89

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "P"	Date of appointment	Signature of Government Servant	Where and to what office he has been appointed, in other cases in other columns
D.M. C.G.M.S. Thakot			Rs. 6480/-			20/9/09		District School Thakot
D.M. C.G.M.S. Mohandoli (mas)			Rs. 6480/-			1/10/09		District School Mohandoli
			Rs. 6500/-			1/12/09		Primary School Ma...
			Rs. 7320/-			1/12/2010		
		Revised B-15 = (8500 - 750 - 29500)						
			Rs. 12000/-			1/07/2011		
			Rs. 12700/-			1/12/2011		
			Rs. 13400/-			1/12/2012		
			Rs. 14100/-			1/12/2013		
			Rs. 14900/-			1/12/2014		

ATTESTED

ATTESTED

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PLEASE SEE ITS  
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OFFICE OF THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUN KHAWA, PESHAWAR  
OFFICE ORDER

Consequent upon the approval of the competent authority, Mst Zia Gul DM at  
CGMS, Shalian (Manshera) is hereby transferred to CGMS, Dher Hamid Mian Charsadda,  
against vacant post of DM on her own pay, and EPS in the interest of Public Service with effect  
from the date of his taking over charge.

Note:-  
Charge report should be sent to all concerned.  
NO TADA etc is allowed  
The EDO (E&SE) concerned is directed to check her original service documents  
before making payment of salary  
Her Seniority list will be determined under the rule.

DIRECTRESS  
ELEMENTARY & SECONDARY  
EDU KHYBER PAKHTUN KHAWA PESHAWAR

Endst No 3655-60/F.No.134/Dist Trsl, Dated Peshawar the 27/01/2011.

Copy forwarded for information to the:-

1. Executive District Officer (E&SE) Manshera/Charsadda.
2. District Accounts Officer Manshera/Charsadda.
3. Headmistress Concerned.
4. Teacher Concerned.
5. P.A to Director (E&SE) Khyber Pakhtun Khawa Peshawar.
6. M/ File.

Deputy Directress (Estab)  
(E&SE) Khyber Pakhtun  
Khawa Peshawar.

ATTESTED

CI 11/11/11

ATTESTED

**OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**

**OFFICE ORDER**

Consequent upon the approval of the competent authority Mst Zia Gul DM at GGMS Shallan (Mansehra) is hereby transferred to GGMS Hamid Mian Charsadda against vacant post of DM on her own pay and BPS in the interest of Public Service with effect from the date of his taking over charge.

Note:-

1. Charge report should be sent to all concerned.
2. NO TA/DA etc are allowed.
3. The DEO (Female) Charsadda is directed to check all service documents before the release of pay.
4. Her seniority will be determined as per rules / policy.

**Director**  
**Elementary & Secondary**  
**EDU Khyber Pakhtunkhwa, Peshawar**

Endst No. 3655-60/F. No. 134/1/Dist Trsl

Dated Peshawar the 27.01.2011.

Copy for information to the:

1. Executive District Officer (E&S) Battagram Charsadda
2. District Accounts Officer Charsadda / battagram.
3. Headmistress Concerned
4. Teacher concerned.
5. PA to Director E&SE Khyber Pakhtunkhwa Peshawar
6. M/ File.

**Deputy Director (Estb)**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa, Peshawar**

**ATTESTED**

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PLEASE SEE THE ORIGINAL FILE NO. 101  
ANNEXURE - A

ENQUIRY REPORT

Vide Notification Endst. No. 4124-86 dated 25/09/2017 (F/A) Mr. Jemalir Principal Government Shahid Osama Zafar CMHS No. 2 Peshawar City along with Mr. Khizar Hayat Senior Subject Specialist GHSS No. 4 Peshawar, as Co-opted member are authorized to conduct Enquiry against Mst. Zia Gul presently working as DM at GGMS Dheri Hameed Mian Distt Charsadda regarding her matter of fake documents.

Back ground

Mst. Zia Gul Submitted her Service Book vide which she has been appointed as DM in PPS-09 at GGMS Thakot District Battagram against vacant post vide EDO(S&L) Battagram Endst. No. 3505-09 dated 14-3-2006. Subsequently she has been allowed to PPS-14 on the basis of BA 2<sup>nd</sup> division w.e.f 15-03-2006 vide EDO(S&L) Battagram Endst. No. 1219-22 dated 10-05-2006. Further she has been allowed PPS-15 on the basis of up gradation of P&S from 01-10-2007. Service verified w.e.f 15/03/2006 to 30/11/2007 from the Acquaintance Roll and other record of the EDO(S&L) Battagram. Later on she has been transferred to GGMS Manohari (Mansehra) on 01/10/2009. Her service record from the office of District Officer (Female) E&S Education Battagram while her service also verified w.e.f 01/10/2009 to 30/11/2009 from the Acquaintance Roll & other record from the District Officer (Female) School & Literacy Mansehra. In addition w.e.f 01/08/2010 to 26/02/2011 (212 days) leave without pay was sanctioned vide EDO E&S Mansehra under Endst No. 3965-66 dated 14/03/2011. At last she has been transferred to GGMS Dheri Hameed Mian Distt Charsadda vide Endst No. 3655-60 F.No. 134/F/Distt Charsadda Dated 27/10/2011. Till date she is working as DM at the very school i.e Dheri Hameed Mian Distt Charsadda.

Proceedings:

The undersigned along with Mr. Khizar Hayat senior Subject Specialist No. 4 Peshawar as Co-opted member visited office of the District Education Officer (F) E&SE Battagram & Mansehra on 25-26/09/2017. The matter was discussed with DEO (Female) Battagram and concerned staff. Record pertaining to appointment orders of the period 2006 with regards to DM appointments was examined and discussed with the concerned staff. Mr. Wasia said she then District Officer (Female) school and Literacy Battagram was called upon by the

to be  
M. Wasia  
2017

*[Handwritten signature]*

CERTIFIED TO BE TRUE COPY

Fazal Ullah Kundli  
Advocate-on-Record  
Supreme Court of Pakistan

ATTESTED

**ENQUIRY REPORT**

Vide notification Endst NI. 4184-86 dated 25.09.2017 (P/A) Mr Jehangir Principal Government Shaheed Qsama Zafar CMHSS No 2 Peshawar City along with Mr Kizar Hayat Senior Subject Specialist GHSS NO 4 Peshawar, as Co0working as DIV at GGMS Dheri Hameed Mian Distt Charsadda regarding her matter of fake documents.

**BACKGROUND**

Mst Zia Gul submitted her service Book vide which she has been appointed as DM in BPS-09 at GGMS Thakot District Battagram against vacant post vide EDO(S&L) Battagram Endst No 3505-09 dated 14.03.2006. subsequently she has been allowed to BPS-14 on the basis of BA 2<sup>nd</sup> Division w.e.f 15.03.2006 vide EDO(S&E) Battagram Endst No 1819-22 dated 10.05.2006. Further she has been allowed BPS-15 on the basis of up gradation of BOS from 01.10.2007. Service verified w.e.f 15.08.2006 to 30.11.2007 from the acquaintance Roll and other record of the EDO (S&L) Battagram. Later on she has been transferred to GGMS Mohandri (Mansehra) on 01.10.2009. her service verified w.e.f 01.12.2007 to 30.11.2009 from the acquaintance Roll & other record from the office of District Officer (Female) E&S Education Battagram. While her service also verified w.e.f 01.10.2009 to 30.11.2009 from the literacy Mansehra. In addition w.e.f 01.08.2010 to 18.02.2011 (212 days) leave without oay was sanctioned vide EDI E&SE Mansehra under Endst No. 3965-66 dated 14.03.2011. At least she has been transferred to GGMS Dheri Hameed Mian Distt Charsadda bide Endst No. 3655-60 F No. 134/F/Distt Charsadda dated 27.10.2011. Till date she is working as DM at The very school i.e Dheri Hameed Mian Distt Charsadda.

**Proceedings:**

The undersigned along with Mr Khizar Hayat senor subject specialist No 4 Peshawar as Co opted member visited office of the District Education Officer (F) E&SE Battagram & Mansehra on 25-26.09.2017. The matter was discussed with DEO (Female) Batagram and concerned staff. Record pertaining to appointment orders of the priod 2006 with regards to Dm appointments was examined and discussed with the concerned staff Mr Wasiq Sadi, the then District Officer (Female) school and literacy Battagram was called upon by the

**ATTESTED**

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ORIGINAL COPY

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undersigned at the office of DEO (Female) Battagram. He was presented original appointment order and Service Book of Mst. Zia Gul (F/B). Mr. Wasiq Said flatly denied his signatures on the appointment order as well as entries made in the Service Book of Mst. Zia Gul.

Mr. Wasiq said the then District Officer (F) S&L District Battagram in his written statement (F/C) termed that signatures made on the appointment order as well as service book (illegible). He appended his specimen signatures in his written statement as well.

In addition nothing was found regarding appointment of Mst. Zia Gul as DM at GGMS Takot Battagram. Further Teacher Attendance Register GGMS Takot Battagram of the Period September 2006 to November 2009 was examined in original (copy attached) (F/D) where in attendance of Zia Gul as DM is not verified for the period claimed in the service book i.e (w.e.f 15-03-2006 to 30-11-2009). Her salary too for the same period at Battagram has no whereabouts as per office record of district Battagram and at prima facie seems that salary has not drawn for the period mentioned above.

2- The undersigned also visited office of the DEO (F) Mansehra on 26/9/2017. Office record regarding Mst. Zia Gul was searched by the concerned relevant staff but nothing was found regarding Inter District Transfer order etc of Mst. Zia Gul. It merits consideration that salary for the period November 2009 to July 2010 was drawn at District Mansehra (F/E).

3- Mst. Zia Gul in her written statement (F/F) commented that in response to advertisement she applied for the post of DM at District Battagram. She took written test securing 48 marks out of 50 and also appeared for interview, on the basis of which selected and took charge of DM at GGMS Takot District Battagram and received salary for about 2 years but did not provide any supporting documents in this regard.

4- DEO (F) Battagram vide (F/G) confirmed that office record regarding the appointment of Mst. Zia Gul is silent and may be considered as fake and bogus.

5- DEO (F) Mansehra vide (F/H) asserted that whole documentation on behalf of this office from her transfer to this District at GGMS Mohandri and onward to District Charsadda is fake and bogus.

Attested  
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CERTIFIED TO BE TRUE COPY

Advocate General  
Supreme Court of Pakistan.

ATTESTED

Undersigned at the office of DEO (Female) Battagram. He was presented original appointment order and service Book of Mst Zia Gul (F/B) Mr Wasiq Said flatly denied his signatures on the appointment order as well as entries made in the Service Book of Mst Zia Gul.

Mr Wasiq said the then District Officer (F) S&L District Battagram in his written statement (F/C) termed that signatures made on the appointment order as well as service Book fictitious his specimen signatures in his written statements as well.

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2- The undersigned also visited office of the DEO (F) Mansehra on 26.09.2017 office record regarding Mst Zia Gul was searched by the concerned relevant staff but nothing was found regarding inter District Transfer order etc of Mst Zia Gul. It merits consideration that salary for the period November 2009 to July 2010 was drawn at District Mansehra (F/F)

3- Mst Zia Gul in her written statement (F/F) commented that in response of advertisement she applied for the post of DM at District Battagram. She took written test securing 48 marks out of 50 and also appeared for interview, on the basis of wch selected and took charge of DM at GGMS Takot District Battagram and received salary for about 2 years but did not provide any supporting documents in this regard.

4- DEO (F) Battagram vide (F/G) confirmed that office record regarding the appointment of Mst Zia Gul is silent and may be considered as fake and bogus

5- DEO (F) Mansehra vide (F/H) asserted that whole documentation on behalf of this office from her transfer to this District at GGMS Mohandri and onward to district Charsadda is fake and bogus.

**ATTESTED**



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Findings

- I. Appointment Order of Mst Zia Gul as PM at GGMS Takot District Battagram is fake and bogus as per record of the office of DEO (F) Battagram.
- II. As per Teacher Attendance Register GGMS Takot District Battagram her attendance for the period March 2005 to November 2009 did not verify (F/A).
- III. Mst Zia Gul failed to provide any supporting documents before the committee in favor of duty performed/attendance, charge took over, Inter District Transfer Orders, salary drawn at GGMS Takot District Battagram etc.
- IV. The then District Officer Education District Battagram viz Mr Wasiq said confirmed the signatures on Appointment Order as well as entries made in Service Book fake and Bogus. (F/C)
- V. Salary for the period September 2009 to July 2010 (9 months) drawn at Mansehra (F/D) but record/documentation in this regard is not traceable at the Office of DEO (F) Mansehra.
- VI. Inter District Transfer order of Mst Zia Gul from District Battagram to District Mansehra is untraceable at the office of DEO (F) Mansehra.
- VII. DEO (F) Mansehra viz her letter (F/H) does not confirm performance of duty at GGMS Mohandri while salary drawn and record in this regard is not traceable.
- VIII. Allied Bank Charsadda, Statement Period 01 January 2014 to 28 September 2017 (F/K) depicts online transfer salary of Mst Zia Gul.

Recommendations

- 1- District Education Officer (F) and District Accounts Officer District Mansehra are held responsible for drawl of illegal salary in R/O Zia Gul for the period November 2009 to July 2010.
- 2- Recovery of salary drawn for the period November 2009 to July 2010 (9 Month) at Mansehra be made.
- 3- (a) As such, the appointment Order as well as Service Book document of Mst Zia Gul are cancelled and hence to be considered as null and void or otherwise.

Attested

IDENTIFIED TO BE TRUE COPY

Farid Ahmad Kundi  
Advocate-on-Record  
Supreme Court of Pakistan

ATTESTED

**Findings**

- i. Appointment order of Mst Zia Gul as DM at GGMS Takot District Battagram is fake and bogus as per record of the office of DEO (F) Battagram.
- ii. As per Teacher Attendance Register GGMS Takot District Battagram her attendance for the period March 2006 to November 2009 did not verify (F/D)
- iii. Mst Zia Gul failed to provide any supporting documents before the committee in faovur of duty performed / attendance, charge took over, inter district transfer orders, salary drawn at GGMS Takot District Battagram etc.
- iv. The then District Officer Education District Battagram viz Mr Wasiq said confirmed the signature on appointment order as well as entries made in Service Book fake and Bogus (F/C)
- v. Salary, for the period September 2009 to July 2010 (9 months) drawn at Mansehra (F/D) but record / documentation in this regard is not traceable at the Office of DEO (F) Mansehra.
- vi. Inter District Transfer order fo Mst Zia Gul from District Battagram to District Mansehra is untraceable at the office of DEo (F) Mansehra.
- vii. DEO (F) mansehra vide her letter does not confirm performance of duty at GGMS Mohandri while salary drawn and record in this regard is not traceable.
- viii. Allied Bank Charsadda, Statement period 01 January 2014 to 28 September 2017 (F/K) depict on line transfer salary of Mst Zia Gul.

**Recommendations**

- 1- District Education Officer (F) and District Accounts Officer District Mansehra are held responsible for drawl of illegal salary in R/O Zia Gul for the period November 2009 to July 2010.
- 2- Recovery of salary drawn for the period November 2009 to July 2010 (9 months) at Mansehra be made.
- 3- (a) As such the appointment order as well as Service Book document of Mst Zia Gul are concerned and hence be considered as nul and void or otherwise.

**ATTESTED**

(b) As a 2<sup>nd</sup> option if the Department deem it appropriate, Mst Zia Gul be reappeared for recruitment through NTS on the grounds of her academic qualification, experience/duty, against which she has received salary at GGMS Dheri Hameed Malh Thungl Charsadda for the period 01 January 2014 to 28 September 2017.

*[Signature]*  
12-10-2017  
Mr. Jahangir  
Enquiry Officer

*[Signature]* 12/10/17  
Mr. Khizar Hayat  
Co-opted Member

Attested  
*[Signature]*

DEPARTMENT TO BE TRULY COPY

*[Signature]*  
12/10/17

ATTESTED

(b) As a 2<sup>nd</sup> option if the Department deem it appropriate Mst Zia Gul be reappeared for recruitment through NTS on the grounds of her academic qualification, experience / duty, against which she has received salart at GGMS Dheri Hameed Mian Thungi Charsadda for the period 01 January 2014 to 28 September 2017.

MR. Jehangir  
Enquiry Officer

Mr. Khizar Hayat  
Coopted Member

**ATTESTED**

75

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM

No. 312 / F.No. 8/Vol-I  
Dated 28-07-2017

ADP: (1) / (2)  
D. Bhattarai  
C. S. ...  
...  
28/7/17  
D. Bhattarai

The District Education Officer,  
(female) Charsadda

Subject: SERVICE VERIFICATION

Memo:

Reference your letter No.8956 dated 20.12.2016 on the subject cited above and to state that the official record of this office is completely silent regarding the appointment under reference. Hence they may be considered fake and bogus please.

The service book in respect Miss. Zia Gul, DM is returned herewith for further necessary disposal please.

DISTRICT EDUCATION OFFICER (FEMALE)  
BATTAGRAM

312 No. 1175  
du 28/7/2017

attested

VERIFIED TO BE TRUE COPY

Supreme Court of Pakistan

ATTESTED

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PESHAWAR HIGH COURT, PESHAWAR.

FORM A  
FORM OR ORDER SHEET

Date of order.	Order or other proceedings with the order of Judge
ORDER 14.09.2017	<p>Writ Petition No. 2028-P/2017 with COC No. 477-F/2017</p> <p>Present:- Mr. Muhib Jan Salurzal, Advocate, for the petitioner.</p> <p>Mr. Rab Nawaz Khan, A.A.C, for the respondents along with Ms Bushra Begum, ADEO, DEO(F) Office Charsadda.</p> <p>*****</p> <p>Mst. Zia Gul wife of Hamayoun, the petitioner, allegedly serving as a Drawing Master BPS-18 and presently Posted in Govt Girls Middle School, Dheri Hamid Nifan, District Charsadda, is aggrieved from the action of the respondents whereby her monthly salary has been withheld since January, 2017, without any legal justification.</p> <p>Learned counsel for the petitioner contended that ever since her appointment way back in the year 2006 as a Drawing Master at GGMS Thakot Battagram, the petitioner has been regularly performing her duties and even after her transfer to District Charsadda, she has been regularly attending to her duty and she has been receiving her monthly salary as well, but all of a sudden, in pursuance of a letter addressed by DEO (female)</p>

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alleged

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**PESHAWAR HIGH COURT, PESHAWAR**

**FORM "A"**

**FORM OF ORDER SHEET**

Date of Order	Order or other proceedings with the order of Judge
<p>Order 14.09.2017</p>	<p>Writ Petition No. 2028-P/2017 With COC No. 477-P/2017</p> <p>Present: Mr Muhib Jan Salarzai, Advocate for the Petitioner</p> <p>Mr. Rab Nawaz Khan AAG for the respondents along with MS Bushra Begum, ADEO, DEO (F) office Charsadda.</p> <p>Mst Zia Gul wife of Hamayoun, the petitioner allegedly serving as a Drawing Master BPS-16 an presently posted in Govt Girls Middle School, Dheri Hamid Mian, District Charsadda is aggrieved from the action of the respondents whereby her monthly salary has been withheld since February 2017, without any legal justification.</p> <p>Learned counsel for the petitioner contended that ever petitioner appointment, way back in the year 2006 as a Drawing Master at GGMS Thakot Battagram, the Petitioner has been regularly performing her duties and even after her transfer to District Charsadda, she has been regularly attending to her duty and she has been receiving her monthly salary as well, but all of a sudden in pursuance of a letter addressed by DEO (Female)</p> <p style="text-align: center;"><b>ATTESTED</b></p>

(77)

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Battagram, her salary has been withheld since January, 2017.

On the previous date when learned AAG was confronted with the relief sought by the petitioner, he submitted that the very appointment order of the petitioner is fake and that is how an enquiry is in progress in the matter which will take some time. In this view of the matter, this Court hold that as to why at Thakot Battagram for five long years and even after her transfer to District Charsadd in the year 2011, nobody in the Education Department noticed the appointment of the petitioner to be based on fake and bogus appointment letter and that in such like matters, it should not be merely an individual to be sent home packing but the responsible persons in the high echelons of Education Department should also be strictly proceeded against in accordance with law, however, the respondents were directed to release the salaries of the petitioner subject to the final outcome of the enquiry.

Since, the respondents have not paid released salary of the petitioner as directed by this Court, therefore, the petitioner has filed GOC No.477-P/2017, which is also fixed today. Learned AAG accepted notice and reiterated that when appointment of the petitioner is fake and there is no record of the same, the respondents

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10/10/2017

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Battagram, her salary has been withheld since, January 2017.

On the previous date when learned AAG was confirmed with the relief sought by the Petitioner, he submitted that the very appointment order of the petitioner is fake and that is how an enquiry is in progress in the matter which will take some time. In this view of the matter, this court hold that as to why at Thakot Battagram for five long years and even after her transfer to District Charsadda in the year 2011, nobody in the Education Department noticed the appointment of the petitioner to be passed on fake and bogus appointment letter and that in such like matters, it should not be merely an individual to be sent home packing but the responsible persons in the High Schools of Education Department should also be strictly proceeded against in accordance with law, however, the respondents were directed to release the salaries of the Petitioner subject to the final outcome of the enquiry.

Since, the respondents have not paid released salary of the petitioner as directed by this court, therefore, the petitioner has filed COC No. 477-P/2017, which is also fixed today. Learned AAG accepted notice and reiterated that when appointment of the petitioner is fake and there is no record of the same, the respondents

**ATTESTED**

ATTESTED

ATTESTED

JUDGE  
JUDGE

...were unable to release the salaries of the petitioners.  
 ...the parties agreed and requested the Court for sending the  
 matter to Anti Corruption Department for probe and  
 proceedings. Accordingly, the matter is sent to the  
 Director Anti Corruption, Khyber Pakhtunkhwa with the  
 direction to probe into the matter within a fortnight,  
 positively and to submit report to this Court. Office is  
 directed to send copy of writ petition and all documents  
 annexed therewith coupled with the comments and  
 documents brought on record by the respondents to the  
 Director Anti Corruption Khyber Pakhtunkhwa for doing  
 the needful within a fortnight and to submit report on or  
 before the date fixed. Adjourned to 11.10.2017.

PLEASE PRINT

(S)

(H)

(B)

(C)

Were unable to release the salaries of the petitioners.

Confronting with the stance of each other, the parties agreed and requested the Court for sending the matter to Anti-Corruption Department for probe and proceedings. Accordingly, the matter is sent to the Director Anti-Corruption Khyber Pakhtunkhwa with the direction to probe into the matter within a fortnight, positively and to submit report to this court. Office is directed to send copy of writ petition and all documents annexed therewith coupled with the comments and documents brought on record by the respondents to the Director Anti Corruption Khyber Pakhtunkhwa for doing the needful within a fortnight and to submit report on or before the date fixed. Adjourned to 11.10.2017.

**JUDGE**

**ATTESTED**

ATTESTED

ATTESTED

Handwritten text, possibly a signature or date, located below the second 'ATTESTED' stamp.

9-10-017

COACHMAN

Main body of handwritten text, appearing to be a list or record with various entries and circled numbers.

Handwritten initials or mark at the bottom left, possibly '79'.

Handwritten mark or signature at the bottom right.



80

Office of the District Education Officer Female  
District Charsadda

0919220086 emischarsadda.deof@yahoo.com

No. \_\_\_\_\_ / Dated 16 / 06 / 2022

OFFICE ORDER

In Compliance of the Judgment dated 11-11-2021 titled Nazma Ali others (3) club cases passed by the Hon,ble Service tribunal with the consultation and recommendation of the Enquiry committee discussed herein above the undersigned in the capacity of being competent authority and the instant cases of the considered opinion that the following appellants are not entitled to reinstate against the posts in question. Moreover notification been Endst Nos 1508-15 dated 19-07-2019 and Endst No, 10644-46 dated 22-11-2017 of the Ex-DEO (F) Charsadda are hereby maintained in the interest of public service please.

S.No.	Name of teachers	School names
1	Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
2	Mst shama begum Ex-PST	GGPS pigham Charsadda
3	Nighat seema Ex AT	GGHS Dadu killi Charsadda
4	Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda

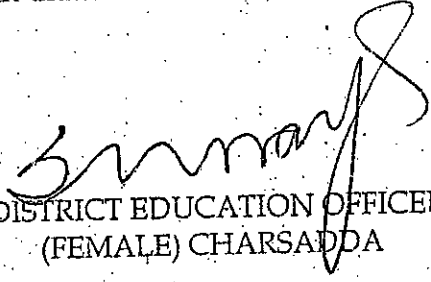
  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

Endst NO 12025-30 dated 16 / 06 / 2022

Copy for information

- (1) PA to director E&SE khber pukhtoön khwa
- (2) Mst Nazma Ali Ex-CT GGMS Rajjar Charsadda.
- (3) Mst Shama begum EX-PST GGPS Pigham killi Charsadda.
- (4) Mst Nighat seema EX-AT GGHS Dadu killi Charsadda.
- (5) Mst Zia Gul EX- DM- GGMS dheri Hameed Mian Charsdda.
- (6) office file.

  
ATTESTED

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

81



17<sup>th</sup> Oct., 2022

Counsel for the petitionert present. Mr. Kabirullah Khattak, Addl. AG alongwith Tauseef Ahmad, ADEO for the respondents present.

Learned counsel for the petitioner seeks adjournment in order to further prepare the brief. Adjourned. To come up for further proceedings on 04.11.2022 before S.B.

(Kalim Arshad Khan)  
Chairman

SCANNED  
KPST  
Peshawar

4<sup>th</sup> Nov, 2022

1. None for the petitioner present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

02. On 02.09.2022 implementation report was filed by the DEO (F) Charsadda according to which, in compliance with the judgment of the Tribunal, the petitioner, alongwith three others, were initially reinstated in service vide order dated 20.01.2022 but on the directions of the Tribunal a de-novo enquiry was conducted where-after the petitioner and the three others were found not entitled to be reinstated vide office order Endst No. 12025-30 dated 16.06.2022. The order dated 16.06.2022 has created a new cause of action in favor of the petitioner and he may recourse to other legal proceedings available to him under the law. As regards this petition, the compliance of the judgment has been made, therefore it is filed. Consign.

3. *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal on this 4<sup>th</sup> day of November, 2022.*

(Kalim Arshad Khan)  
Chairman

Certified to be true copy  
Khalid Raza  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Ammer "H" (82)

**BEFORE THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR**

**Subject:**

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED  
OFFICE ORDER NO 12025-30 DATED 16-06-2022  
WHEREBY THE INITIAL IMPUGNED OFFICE ORDER  
NO.10643 DATED 22/11/2017 PASSED BY THE DEO  
(FEMALE) CHARSADDA HAS BEEN KEPT MAINTAINED.  
AND THE SERVICE OF THE APPELLANT HAS BEEN  
DISPENSED BEING NO MORE REMAINED TEACHER.

**Prayer:**

On acceptance of this departmental appeal, both the impugned Office Order No 12025-30 dated 16-06-2022 & initial impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda may kindly be set aside and the appellant be re-instated to her service with all back benefits.

=====

**Respectfully Sheweth:**

1. That the Appellant was initially appointed in BPS-9 as Arabic Teacher (AT) vide appointment order dated 01/09/2009 by the competent authority after adopting all the codal & legal formalities, which was later on upgraded to B.P.S-15 and thereafter without any legal & lawful reason vide office order No 10643 dated 22/11/2017 passed by the DEO (Female) Charsadda, the service of appellant was dispensed, thereafter the appellant filed Service appeal No 1380 / 2019 which was allowed vide order dated 11-11-2021 by setting aside the impugned order and the case was referred for regular and detail inquiry but now again without conducting any detail inquiry as order by the Honorable Tribunal, the DEO (Female) Charsadda passed the impugned Officer Order No 12025-30 dated 16-06-2022 whereby the initial order has been kept maintained by dispensing the service of appellant.

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**ATTESTED**

2. That both the impugned office order No 12025-30 dated 16-06-2022 & initial impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda are totally illegal, against E&D Rules 2011, justice and facts of the case therefore not tenable.
3. That according to the Direction of Honorable Service Tribunal no inquiry has been conducted, nor any no show cause notice and statement of allegation has been issued to the Appellant, neither the Appellant was informed or associated in the alleged inquiry and no opportunity of hearing has been provided to the Appellant, therefore the impugned order has been passed on the back of the appellant meaning thereby, that the initial order of DEO (Female) Charsadda has been endorsed without complying the direction of the Honorable Service Tribunal KPK Peshawar.
4. That the alleged inquiry officer has not called the appellant for inquiry proceeding and the alleged inquiry report was prepared just to absolved himself by the DEO (Female) Charsadda from the direction of Honorable Service Tribunal KPK Peshawar, therefore the impugned order is illegal and not according to law nor inconsonance with the fact of the case rather the same has been passed to show that the inquiry proceeding has been conducted in the light of the order of Honorable Service Tribunal KPK Peshawar.
5. That the appellant has been appointed in the year 2009 and the DEO (Female) Charsadda has been awakened from deep slumber in the year 2017 by declaring the appointment order of the appellant to be fake, despite the fact that every year in the service book of the appellant, the service of the appellant has been verified by the competent authority, therefore the allegation of fake appointment of the appellant is baseless and based on mala fide.

ATTESTED



(3)

6. That in the alleged inquiry, there is no assertion of the officer / competent authority of the relevant time who has denied the appointment order of the appellant nor the statement has been recorded of the officer, who had appointed the appellant by the inquiry officer to determine the genuineness & fakeness of the appointment order of the appellant.
7. That the appellant has more than 10 year service on her credit and at this belated stage, it does not appeal to the prudent mind that the appointment order of the appellant is false or fraudulent and fake.
8. That the alleged inquiry officer has not followed the E & D Rule 2011 in letter & spirit rather the same has been violated by submitting a frivolous inquiry report for dispensing the service of the appellant.
9. That the word dispensing is no where mentioned in the service law or E & D Rule 2011, therefore the impugned dispensing order as well as the alleged inquiry conducted by the so called inquiry officer are not true & correct in the light of the judgment & direction of the Honorable Service Tribunal KPK Peshawar.
10. That while dispensing the service of the appellant, no final show cause notice was issued to the appellant and the appellant has been kept un informed from the alleged inquiry and the alleged inquiry was filed in the execution proceeding before the Honorable Service Tribunal KPK Peshawar, wherefrom the appellant has got the knowledge of the alleged inquiry & impugned order, and the execution petition was disposed off on 17-10-2022.
11. That the appellant also request for personal hearing at the time of hearing / disposal of instant appeal.

ATTESTED

Prayer:-

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It is therefore requested that on acceptance of this departmental appeal on behalf of appellant, the impugned service dispensing Order No 12025-30 dated 16-06-2022 & impugned office order No.10643 dated 22/11/2017 passed by the DEO (Female) Charsadda may graciously be set aside and the appellant be re-instated to her service with all back benefits.

**Appellant**

*Nighat Seema*

Mst Nighat Seema

(Ex-Arabic Teacher (AT) GHHS Dadu Kalli

Charsadda

ATTESTED

86



33687

ایڈوکیٹ: *Mirza Hafeez*

بار کونسل ایسوسی ایشن نمبر: *bc-12-3483*

رابطہ نمبر: *0300-5917744*



پشاور بار ایسوسی ایشن، خیبر پختونخواہ

*سروس میٹریکل کارڈ*

بعدالت جناب:

مخاطب: <i>ایڈووکیٹ</i>	دعویٰ:
<i>سماہٹ لٹریچر سکیم</i>	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

**باعث تحریر آتکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام *ایڈووکیٹ* کیلئے *سماہٹ لٹریچر سکیم* کے کوڈیکل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: *23-02-2023*

العبد *گواہ شد* العبد  
مقام *ایڈووکیٹ* کے لیے منظور ہے۔

*ایڈووکیٹ*  
تاریخ اس حکایت نامہ کی نوکالی تاحیل قبول ہوگی۔  
*0300-5917744*

*سماہٹ لٹریچر سکیم*  
*Digital Seema*