FORM OF ORDER SHEET

Appeal No. 267/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/02/2024	The appeal of Mr. Hazrat Bilal resubmitted today
		by Mr. Tajdar Faisal Khan Advocate. It is fixed for
		preliminary hearing before Single Bench at Peshawar on
		15-2-2024 Parcha Peshi is given to counsel for the appellant.
		By the order of Chairman

The appeal of Mr. Hazrat Bilal received today i.e on 02.02.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Departmental appeal is unsigned.

 ± 2 . Page no. 13 of the appeal is illegible which may be replaced by legible/better one.

No. 233 /S.T.

m. b 2 /2024.

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Taidar Faisal Khan Adv. High Courret Peshawar.

objections seen. Removed as per instructions. Re-submitted for Frantion

Taydor Faisal Khan

BEFORE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 267 /2024

Hazrat Bilal S/O Khaleel ur Rehman, Primary School Teacher BPS-12 at GPS No.2 Mina Khel Lakki Marwat. [Appellant]

VERSUS

Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar & others [Respondents]

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5.	Copy of attendance register	С	14 23
6.	Copy of impugned order dated: 25-09-2023	D	24.25
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Through

Arbab Saif ul Kamal Advocate High Court.

Tajdar Faisal Khan (Mina Khel) Advocate High Court. 0313-9609168 minakhel@yahoo.com

BEFORE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 267/2024

Hazrat Bilal S/O Khaleel ur Rehman, Primary School Teacher BPS-12 at GPS No.2 Mina Khel Lakki Marwat. [Appellant]

VERSUS

- 1. Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Peshawar
- 2. The Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar
- 3. The District Education Officer (Male), Lakki Marwat

[Respondents]

SERVICE APPEAL U/S-4 OF KPK SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED ORDER DATE 25-09-2023 OF
DISTRICT EDUCATION OFFICER, MALE LAKKI MARWAT
WHEREBY APPELLANT WAS DISMISSED FROM SERVICE AND
INACTION OF RESPONDENTS TO DECIDE THE
DEPARTMENTAL APPEAL WITHIN THE STATUTORY PERIOD.

PRAYER:-

On acceptance of the instant appeal it is earnestly and very humbly requested to set aside the impugned Order dated 25-09-2023 issued by District Education Officer, Male Lakki Marwat and the appellant may kindly be reinstated into service from the date of dismissal with all back benefits. Moreover, salaries from the month of July, 2023 till date of dismissal may also be released to the appellant. Further order of recovery of salaries / allowance is to be declared null and void, against the norms of justice and in violation of judgments of superior courts of Pakistan.

Respectfully Sheweth:

FACTS:

1. That appellant is the permanent resident of Mohallah Mina Khel Union Council Lakki-I Tehsil and District Lakki Marwat as per his CNIC and domicile certificate. Appellant has unblemished service record and there is no complaint against him during the entire service. It would be relevant to mention that appellant has a distinction in SSC and has earned Bechlor of Engineering (Civil), which is awarded to him by the University of Engineering & Technology, Peshawar.

{Copy of CNIC & educational record is attached, as mark Annex-A}

- 2. That the appellant belongs to a respectable family and has a dignified and integrated status among the family, society.
- **3.** That the appellant was appointed through office order bearing No.5495-5506 dated: 06-10-2022 against the vacant post of PST BPS-12 and posted in Government Primary School No.2 Mina Khel Lakki Marwat.

{Copy of Appointment Order is attached, as mark Annex-B}

- 4. That the appellant served the duties as PST with zeal and zest in the Government Primary School No.2 Mina Khel Lakki Marwat.
- 5. That the appellant since his appointment always performed his assigned duties to the entire satisfaction of superiors which is evidently based upon the teacher's attendance register maintained in Government Primary School No.2 Mina Khel Lakki Marwat, showing his duties to be performed punctually/regularly.

{Copy of Attendance register is attached, as Annex-C}

- **6.** That during the first week of July-2023, when appellant visits the bank for asking about salary, the bank authorities informed that your salary has been estopped by the department concerned.
- 7. That upon asking about stoppage of salary in the office of Sub Divisional Education Officer, Male Lakki Marwat who informed the appellant that a complaint has been submitted by one Shahzaib R/O Lakki City against the appellant. It would be relevant to state that neither shahzaib filed any complaint against the appellant nor any person deposed against him.
- 8. That one fine morning, appellant was informed that he has been dismissed from government service vide office order bearing No.7508-15 dated 25-09-2023 issued by the District Education Officer, Male LakkiMarwat. Vide impugned order it has been mentioned that MAJOR PENALTY OF
 MINA KHEL LAKKI AND RECOVERY OF SALARIES/

<u>ALLOWANCES WAS ALSO ORDERED</u> without initiating any departmental inquiry proceedings.

{Copy of impugned order dated: 25-09-2023 is attached, as Annex-D}

- 9. That no direct show cause Notice was given/issued to appellant by the Respondent/DEO, Male Lakki Marwat in terms of Rules-5 of Khyber Pakhtunkhwa Government Servants (E&D) Rules-2011 and nor any charge sheet/statement of allegation is served upon him, which is glaring violation of service laws.
- against the impugned order of District Education Officer, Male Lakki Marwat dated 25-09-2023 before Appellate Authority/Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar which was received in his office vide diary No. 1629 dated: 09-10-2023, fate of which is still awaited, as such no response has been received by the appellant till date.

{Copy of Department Appeal is attached, as Annex-E}

11. That feeling aggrieved from the impugned order dated 25-09-2023 of District Education Officer, Male Lakki Marwat (being final order), and from the inaction of the respondents to decide departmental appeal of the appellant within statutory period, is invoking the jurisdiction of this Hon'ble Tribunal on the following grounds:-

GROUNDS:

- **A.** That the impugned order dated 25-09-2023 of District Education Officer, Male Lakki Marwat is against the law, rules and facts on the record.
- B. That appellant has obtained birth certificate from the secretary Union Council Lakki-1 (031) on 28-04-2015 which shows that he belongs to the Union Council Lakki-1 but this aspect of the case has not been given any weightage.

{Copy of birth certificate is attached, as Annex-F}

C. That appellant produced his first educational instution record wherein he was enrolled as student vide No. 1439 dated: 13-04-2004 at Govt. Primary

School Mina Khel No. 1 which is situated in Union Council Lakki-1 and importantly address of the parents of appellant was mentioned as Mohallah Mina Khel which is part of Union Council Lakki-1.

{Copy of educational institution admission is attached, as Annex-G}

- D. The sequence level of the case is that initially respondents have advertised Five Hundred & Four vacancies of Primary School Teachers BPS-12 for District Lakki Marwat upon the school based policy of the Provincial Government Policy in vogue.
- E. After clearing test conducted by ETEA, during the scrutiny process by the then Departmental Selection Committee and issuance of different tentative lists of Union Council Lakki-I for the post of PST, the appellant's has unblemished/clean & clear record.
- F. That appellant has a domicile of Union Council Lakki-1 which was obtained by him before interview / scrutiny of documents by the Departmental Selection Committee.

{Copy of domicile certificate is attached, as Annex-H}

- G. The plea of the Competent Authority in connection with the appellant's dismissal is that a complaint submitted by Mr.Shahzeb S/O Fazal Rabi R/O Mohallah Gul Wali Abad Lakki Marwat against the appellant regarding dual domicile certificates of different UCs and the ibid complaint was forwarded by the Sub Divisional Education Officer Male Lakki Marwat vide letter No.560 dated 08-09-2023 for possessing double domicile certificates. But interestingly, said Shahzaib not only denied such complaint but he has given statement on affidavit that he has not filed any complaint against the appellant.
- H. That the respondents have not treated appellant in accordance with law, departmental rules, regulations and policy on the subject and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 & unlawfully issued the impugned order, which is unjust, unfair, hence is liable to be set aside/declared as ineffective to the extent appellant's rights.

- I. That appellant is a poor man residing with his parents infront of Govt. Post Graduate College for Boys (Mohallah Ayan Town) which is part of Union Council Lakki-1.
- J. That instant appeal is well within time and this Hon'ble Service Tribunal has got every jurisdiction to entertain and adjudicate upon the same.

PRAYERS:

It is therefore, humbly prayed that on acceptance of instant Service Appeal, this Hon'ble Tribunal may please be gracious enough to set aside the impugned Order dated 25-09-2023 and the appellant may kindly be reinstated into service as PST BPS-12 with all back benefits. Moreover, salaries since July, 2023 till dismissal order may also be released. Further order of recovery of salaries / allowance is to be declared null and void, against the norms of justice and in violation of judgments of superior courts of Pakistan. Any other relief which this Hon'ble Tribunal deems fit may be granted.

Through

Arbab Saif ul Kamal Advocate High Court.

Appellañ

Tajdar Faisal Khan Advocate High Court.

Dated ____/01/2024

VERIFICATION:

It is verified that contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.

Dated ____/01/2024

ppellant

BÉFORE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.______/2024

Hazrat Bilal S/O Khaleel ur Rehman, Primary School Teacher BPS-12 at GPS
No.2 Mina Khel Lakki Marwat. [Appellant]

VERSUS

Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar & others [Respondents]

AFFIDAVIT

I, Hazrat Bilal, Primary School Teacher, at GPS No.2 Mina Khel Lakki Marwat (resident of Mohallah Ayan Town, Lakki Marwat) do hereby solemnly affirm and declare that all the contents of this **Service Appeal** is true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Deponent

BEFORE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service A	Appeal	No.	/2024
			 ,

Hazrat Bilal S/O Khaleel ur Rehman, Primary School Teacher BPS-12 at GPS No.2 Mina Khel Lakki Marwat. [Appellant]

VERSUS

Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar & others [Respondents]

MEMO OF ADDRESSES

Hazrat Bilal S/O Khaleel ur Rehman, Primary School Teacher BPS-12 at GPS No.2 Mina Khel Lakki Marwat. [Appellant]

VERSUS

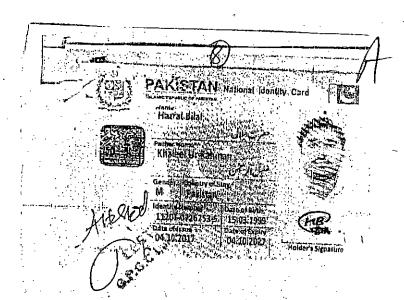
- 1. The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar
- 2. The Director E & S Education Department Khyber Pakhtunkhwa Peshawar
- 3. The District Education Officer, Male LakkiMarwat

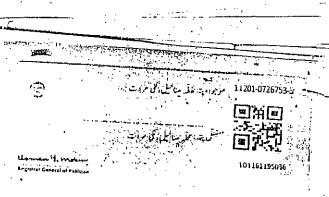
[Respondents]

Through

Arbab Saif ul Kamal Advocate High Court.

Tajdar Faisal Khan (Mina Khel) Advocate High Court.





گشده کارڈ ملنے پرقریبی لیزبکس میں ڈال دیں







گشده کار ڈیلنے پر قریبی لینر کمس میں ڈال دیں



University of Engineering & Technology Peshawar, Pakistan

By virtue of the authority granted by Statutes, the University has conferred the degree of

Bachelor of Science

n

Civil Engineering (Bannu Campus)

tpou

Hazrat Bilal

(Registration No.17BNCIV0922)

S/O

Khaleel Ur Rahman

Who is entitled to all rights and honours thereto appertaining, this 14th Day of September, Two Thousand and Twenty One

Registrar



Vice Chancellor







OFFICE OF THE DISTRICT EDUCATION OFFICER MALE LAKKI MARWAT

Ph & Fax: (0969)538291. Email: emislakki@yahoo.com, Facebook: www.facebook.com/deomalelakki

APPOINTMENT ORDER.

Consequent upon the recommendation of the Departmental Selection Committee meeting held on 04-10-2022, the appointment of the following Five Hundred & Four (504) candidates is hereby ordered against the post of Primary School Teacher (PST) School Based in BPS-12@ Rs. (19770-1430-62670)/-(Rs.19770)/- fixed plus usual allowances as admissible under the rules on adhoc /school-based policy of the Provincial Government in vogue, in teaching cadre on the terms and conditions given below, with immediate effect, in the best interest of public service.

SUB-DIVISION LAKKI MARWAT

I. Union Council...... Aba Khel

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
1.	9426262	MUHAMMAD NOUMAN S.O GUL REHMAN	14-08- 1997	11201- 0816377-1	140.21	GPS LALA KHEL ABBA KHEL
2	951065	KHALID USMAN S-O ABDUR RAHMAN	14-08- 1994	11201- 9334484-1	133.90	GPS MIRZALI SHAH ABBA KHEL
3	947612	SHARIF ULLAH S O YAQOOB KHAN	11-04-1 1989	11201- 6391963-3	132,01	GPS NO.1 ABBA KHEL
4,	951307	INAM ULLAH S'O GUL BAD SHAH	03-02- 1997	11201+ 9644812+5	131.63	GPS SHERI KHEL ABBA KHEL
5.	913291	MAUEED ULLAH S O GU MUHAMMAD KHAN	21-06- 1997	11201- 1829026-1	130.61	GPS NO.2 ABBA KHEL
6.	945040	ASLAM KHAN S-O BAHADER ZAMAN	30-03- 1994	11201- 6978238-9	130.13	GPS TALL KHAN ABBA KHEL
7.	944082	ASIF ULLAH KHAN S'O MUHAMMAD YOUSAF KHAN	03-116- 1998	11201- 1301094-9	129.63	GPS MIRZALI SHAH ABBA KHEL
8.	945597	FARMAN ULLAH KAHN S O GUL BEG KHAN	30-03- 1998	11201- 5383822-5	128.08	GPS MOHALLA SHAH SAHIB ABBA KHEL
<u>9</u> .	943968	ASIF QADIR S O GHULAM QADIR	22-03- 1992	11201- 2895622-3	127.97	GPS WANDA ZERAN ABBA KHEL

2 Union Council Ahmad Khel

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
10.	945/33	SHAFI UR RAHMAN S/O MUHAMMAD AYUB KHAN	01-03- 1999	11201- 4677990-7	135,33	GPS NO.1 AHMAD KHEL
11.	951462	SHAFQAT ULLAH KHAN S/O INAYAT ULLAH KHAN	05-04- 1995	11201- 9859772-3	130.48	GPS DHODA NO. 1
12.	945387	MUHAMMAD MUNIR KIIAN S/O ALLAH DAD	08-03- 1998	11201- 15091356- 7	129.28	GPS DHODA NO.1
З.	944982	HISAN ULLAH KHAN SYO KHUMD ULLAH JAN	01-03- 1995	11201- 4430619-1	129.38	GPS DHODA NO.3
4.	943659	YASEEN KHAN SYO MANZOOR KHAN	27-10- 1993	11201- 0931257-7	126.35	GPS WANDA LANGER KHEL SUR BAND
5.	947893	ABDUL WADOOD KILAN S/O SYED MUHAMMAD	02-03- 1997	11201- 2405995-7	123.96	GPS SHAH HASAN KHEL NO.2
ú.		IMDAD ULLAH KHAN SYO NOOR MUHAMMAD KHAN	05-06- 1998	//20/- 67778/7-3	121.86	GPS DHODA NO.1
7.	945381	NAZEERV ULLAH KHAN SYO AMAN ULLAH	15-02- 1995	11201- 5076862-1	120.48	GPS DHODA NO.2
8.	952493	NAVEED IQBAL S/O ABDUL MAJEED	06-04- 1998	17301- 8950406-5	119.86	GPS WANDA KUTANA

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PST (B-12) Adhee School Based Appointment Order 2022 (ETEA) District Lakki Marwat

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
	951247	RIZIVAN ULLAH S O FAIZ ULLAH	112-111-0	11201- 9538655-3	142,44	GPS NO.3 NAWAR KHEL
66.	944~30	SAEED AHMAD'S O'JAN MCH (MMAD)	12-05- 1998	11561-	138.81	GPS NO.1 ZANGI KHEL
;;	Q48()3Q	ANEES UR REHMAN'S O ABDUL GHAFOOR	01-04- 1099	11201- 6976328-7	138.22	GPS NO.1 ZANGI KHEL
8	944482	MUHAMMAD SOHAIL S O ASLAM KHAN	02-02- 1096	1120136482491	137.35	GPS NO.2 ZANGI KHEL
= 3	949347	WAJID ULLAH KHAN S O KHAN SARDAR	02-04- 1998	1120188836087	135.26	GPS NO.1 DAULAT KHEL
70.	943260	ABDUL WAHLED'S O HAYAT ULLAH KHAN	24-02- 1987	1120117819031	131.35	GPS NO.2 NAWAR KHEL
71.	948770	TAHR NAWAZ S O DIL NAWAZ KHAN	15-04- 1999	1120180616135	130.31	GPS NO.1 DAULAT KHEL
7 <u>2</u> .	943339	RAHAT ULLAH S-O REHMAT ULLAH KHAN	13-03- 1991	1120118911433	130.22	GPS NO.2 ZANGI KHEL
ī3.	943416	SALMAN WARIS S'O WARIS KHAN	15-03-	1120120180783	129.47	GPS ISAK KHEL NO.2
74.	948279	RIZWAN ULLAH S O OBAID ULLAH JAN	05-15- 1994	1120173298509	128.65	GPS NO.4 ZANGI KHEL
75.	949396	NAQEEB ULLAH KHAN S-O MUHAMMAD ALI KHAN	02-05- 1993	1120189544127	128.48	GPS KOHI KILLA ISAK KHEL NO.3
76.	944711	MUHAMMAD NOAMAN STO INAYAT ULLAH KHAN	07-03- 1995	1120140648583	128,14	GPS NO.2 NAWAR KHEL
77.	943652	MISBAH ULLAH S O SHARIF ULLAH KHAN	28-12- 1996	1120124008753	126.92	GPS NO.4 ZANGI KHEL
7 S .	948084 300-	KARIM NAWAZ S O AZIZ KHAN	15-08- 1992	1120170424201	126,69	GPS WANDA AHMAD KHEL
79.	948019	MUHAMMAD RIZWAN KHAN S/O MUHAMMAD JAVED KHAN	26-05- 1993	1120169505295	126.28	GPS NO.3 DAULAT KHEL JADID ABADI
S O .	948380	TANVEER IQBAL S.O MUHAMMAD IQBAL	05-03- 1999	1120174589947	126.23	GPS NO.3 DAULAT KHEL JADID ABADI
S1.	942392	TAHIR NAWAZ S/O MUHAMMAD NAWAZ	01-05- 1994	1120104482419	126.15	GPS NAWAR KHEL NO.1
82.	947458	SADDAM HUSSAIN S/O RAEES KHAN	20-02- 1995	1120161666599	125.84	GPS CHUNAI MASTI KHEL

6-Union Council..... Lakki-I .

S,#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
83.	942562	HAZRAT BILAL S/O KHALEEL UR RAHMAN	15-03- 1999	1120107267535	135.01	GPS NO.2 MINA KHEL
84.	947342	MUHAMMAD HASSAN ALI S/O MUHAMMAD YOUNAS	20-03- 1997	1120159999663	131.69	GPS NO.1 HAODAD ABAD
85.	943855	MANZOOR HUSSAIN S/O AMIR NAWAZ	15-04- 1998	1120127167227	130.74	GPS NO.1 TOTI ABAD LAKKI

7. Union Council..... Lakki-II .

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
86,	944582	MUHAMMAD INAM ULLAH S/O MUHAMMAD YAQOOB	01-05- 1994	1120138246543	138.83	GPS RAILWAY JUNCTION
87.	944213	MUHAMMAD ARIF ULLAH S/O ABDULLAH JAN	08-09- 1996	1120132768733	137.65	GPS JAN ABAD LAKKI
38.	944666	WASI ULLAH S/O SHER AFZAL	07-03- 1998	1120139853527	134.26	GPS NO.1 KHOIDAD KHEL

Page 4 of 21

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PST [B-12] Adhoc School Based Appointment Order 2022 (ETEA) District Lakki Marwat

- Their appointment is made on School based, they will have to serve at the place of posting, and their services are not transferable to any other station during above excel contract period.
- Before handing over charge once again their original documents must be checked by the concerned DDO with final ment list, if they have not the requisite qualifications or they are overage, they may not be handed over charge,
- the undersamed reserves the rights of umendment in this appointment order in case of any mistake/error or onission if any meritarious candidate is deprived of appointment by this order and the competent authority accepts his appeal, the appointment order of the low ment candidate will be withdrawn in favour of mentorious candidates.
- They will receive nine (09) months in-service mandatory professional (Induction) training from Directorate of Ιô. Professional Development (DPD)/ Regional Directorate of Professional Development (RDPD)
- Posting/adjustment on the available vacancies is the discretionary power of the appointing authority and no one 17. has the right to claim for adjustment at the specific school.
- . Salary will be paid subject to provision of Duty Certificate from Hend/DDO concerned. 18.
- In case of regularization, their inter-se-seniority will be determined on the basis of their score and their services 19. will not be transferrable before the completion of three years tenure on original place of posting.

Note: -Relexation of upper age limit in respect of the following candidates as per below detail is hereby relexed vide under this office order No.5427 dated 04-10-2022.

Name of Union Council	Name of Candidate with Father's Name	CNIC #	Date of Birth	Period for which relaxation is granted
March March Charm	MUHAMMAD NAWAZ	1120162131207	15-03-1985	01 Year, 9 Months & 16 Days
34030 /1233 10300	KRAN SO HUKAM KRAN	1120102131201	37.63.1056	01Year,9Monhts & 7
Mela Simhab Khel	FARHAD ALI S/O NAIK	1120168358401	24-03-1930	Days
Bakhmal Ahmad	NAUSHAD KHAN S/O GUL	1120186691835	28-02-1986	00 year , 10Months & 3Days
Zai Takhu Khel	LUQMAN E HAKEEM S/O	1120195611681	09-03-1985	01 Years, 9 Months & 23 Days
	Mash Masti Kham Mela Simbah Khel Bakhmal Ahmad Zai	Council Father's Name	Name of Union Name of California Name of California Name of California Name	Name of Union Name of Canadate Bith

(Zahoor Khan) District Education Officer (Male) Lakki Marwat

/Apptt:PST/2022 Dated. 66 /10/2022

Copy forwarded for information to the: •

- Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner Lakki Marwat.
- 3. Deputy District Education Officer, (Male) Local Office.
- District Accounts Officer, Lakki Marwat
- District Monitoring Officer EMA Lakki Marwat .5
- Sub-Divisional Education Officer Male Lakki Marwat
- Sub-Divisional Education Officer Male Serai Naurang
- Sub-Divisional Education Officer Male Ghazni Khel 8.
- 9. PA to DEO (Male) Local Office.
- 10. AP DEMIS Local Office.
- 11. Candidates concerned.
- 12. Master File.

District Education Officer (Male) Lakki Marwat

Page 21 of 21

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Office of The District Education Officer Male Lakki Marwat

Ph: (0969)538291 ematl: <u>emislakktīryahoo.com</u> facebook.com/deomale Lakki, www.twitter.com/deo_m_lakki

OFFICE ORDER:-

- 1. WHEREAS, Mr Hazrat Bilal son of Mr Khalil-ur-Rehman R/O District Lakki Marwat was appointed against the post of Primary School Teacher BPS-12 on one (01) year contract base in Government Primary School No. 2, Mina Khel District Lakki Marwat vide Appointment Order No. 5495-5506 dated 06-10-2022 at S. No. 83 on the basis of Union Council Lakki City-1 domicile certificate. He assumed charge of the post and his educational documents were verified for the purpose of pay release by Sub Divisional Education Officer Male Lakki Marwat.
- 2. AND WHEREAS, a complaint with allegation that Mr Hazrat Bilal has two (02) domicile certificates with different UCs and tempered address was received to the office of the undersigned. The Sub Divisional Education Officer Male Lakki Marwat also forwarded a complaint of Mr Shahzaib R/O Lakki City to this office; vide his letter No. 560 dated 08-09-2023 against Mr Hazrat Bilal for possessing double domicile certificates.
- 3. AND WHEREAS, during scrutiny of documents at the time of interview/appointment process, Mr Hazrat Bilal Ex-PST had provided copies of two different domicile certificates issued by competent forum vide No. 3110 dated 25-06-2015 and No. 5538-A dated 29-08-2022 with same union council Lakki City-1. He claimed that he had lost original domicile certificate issued vide No. 3110 dated 25-06-2015 and then obtained another domicile certificate from competent forum bearing No. 5538-A dated 29-08-2022 after filing a report in daily diary (roznamcha) with local police. He had tempered his permanent address in the photocopy of domicile certificate issued vide No. 3110 dated 25-06-2015, he produced at the time of interview in order to make it a true copy of the domicile certificate issued vide No. 5538-A dated 29-08-2022 so far as his permanent address is concerned. The domicile certificate bearing No. 5538-A dated 29-08-2022 was obtained after closing date of advertisement.
- 4. AND WHEREAS, the copies of both domicile certificates bearing No. 3110 dated 25-06-2015 and No. 5538-A dated 29-08-2022 were forwarded to the office of Assistant Commissioner (HQ) Lakki Marwat with the request to verify the permanent address along with Union Council and active status of both domiciles, vide DEO Male Lakki Marwat letter No. 6960/Misc dated 07-09-2023.
- 5. AND WHEREAS, the Assistant Commissioner (HQ) Lakki Marat, vide letter No. 305/AC/LM dated 14-09-2023, addressed to Deputy Commissioner Lakki Marwat with a copy to DEO Male Lakki Marwat, confirmed that the above cited ex-official is in possession of two (02) domicile certificates issued vide No. 3110 dated 25-06-2015 pertains to Village Kot Kashmir Union Council Kot Kashmir Tehsil Naurang District Lakki Marwat and the other issued vide No. 5538-A dated 29-08-2022, pertains to Mohallah Ayan Town Union Council Lakki City-I Tehsil Lakki Marwat District Lakki Marwat. Furthermore, the Assistant

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Commissioner (HQ) Lakki Marwat, vide letter No. 312/AC/LM dated 20-09-2023, addressed to DEO Male Lakki Marwat disclosed that Mr Hazrat Bilal ex-PST is in possession of double domicile certificates with separate/different addresses and union councils.

- AND WHEREAS, the above letters proves that during appointment process the 6. above ex-official has provided copy of domicile certificate bearing No. 3110 dated 25-06-2015 of UC Kot Kashmir with tempered permanent address of Mohallah Ayan Town UC Lakki City-1 Lakki Marwat, making himself eligible for appointment against the post of Primary School Teacher by cheating and to make the office of DEO Male Lakki Marwat to consider his both domicile certificates with permanent address of Mohallah Ayan Town of same union council (Lakki City-1).
- AND WHEREAS, the above quoted teacher was provided an opportunity of personal hearing/cross examination of the evidence wherein he falled to satisfy committee 7. members about his double domicile certificates of different union councils, tempering with permanent address and cheating the office of DEO Male Lakki Marwat to secure the job of PST (Primary School Teacher).
- AND NOW THEREFORE, after having considered the charges and evidence on record and documents submitted by office of Assistant Commissioner (HQ) Lakki Marwat, the competent authority (District Education Officer Male Lakki Marwat) is of the view that the charges of possessing double domicile certificates, tempering with permanent address, cheating and concealment of facts have been proved true upon the ex-official and as per terms and conditions of appointment order No. 5495-5506 dated 06-10-2022 at S. No. 07, the competent authority (District Education Officer Male Lakki Marwat) is satisfied and is pleased to dismiss the appointment contract of Mr Hazrat Bilal Ex-PST Government Primary School No. 2, Mina Khel District Lakki Marwat with ab initio effect with recovery of salaries, allowances and perks and privileges equal to amount Rs 263272/- (Rupees Two Lac Sixty Three Thousand Two Hundred Seventy Two) from him.

District Education Officer (Male) Lakki Marwat

Endst No.

1) Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar. Copy to the:-

2) Deputy Commissioner Lakki Marwat

District Monitoring Officer (EMA), Lakki Marwat.

4) District Accounts Officer, Lakki Marwat,

5) Deputy District Education Officer (Male) Local Office. 6) Sub Divisional Education Officer Male Lakki Marwat with directions to record necessary entry in his service book.

Primary School Head Teacher (PSHT) GPS No. 2, Mina Khel Lakki Marwat

8) Mr. Hazrat Bilai S/O Khalii ur Rehman, Ex-PST Resident of Ayan Town District Lakki Marwat.

> District Education Office (Male) Lakki Marwat

То

Worthy Director

Elementary & Secondary Education Department Khyber Pakhtunkhwa

Peshawar

Subject:

DEPARTMENTAL APPEAL AGAINST THE ORDER OF DISTRICT

EDUCATION OFFICER, MALE LAKKI MARWAT BEARING NO.7508-15

DATED 25-09-2023

Respected Sir.

PRAYER IN DEPARTMENTAL APPEAL:

By accepting this departmental appeal, regarding office order bearing No.7508-15 dated 25-09-2023 issued by District Education Officer, Male Lakki Marwat in respect of Hazrat Bilal PST BPS-12 Government Primary School Mina Khel No.2 may be set aside and directed the DEO Male Lakki Marwat to re-instate the appellant into government service.

FACTS:

- That appellant is the permanent resident of Mohallah Mina Khel Union Council Lakki-I Tehsil and District Lakki Marwat as per his CNIC and domicile certificate.
- 2. That the appellant was appointed bearing Order No.5495-5506 dated 06-10-2022 against the vacant post of PST BPS-12 and posted in Government Primary School No.2 Mina Khel Lakki Marwat. The appellant has unblemished service record and there is no complaint against him during the entire service. (Copy of Appointment Order is annexed as F/A).
- That the appellant served the duties till his posting as PST with zeal and zest in the Government Primary School No.1 Mina Khel Lakki Marwat.
- 4. That the appellant since his appointment always performed his assigned duties to the entire satisfaction of superiors which is evidently based upon the teacher's attendance register maintained in Government Primary School No.2 Mina Khel Lakki Marwat enabling served his duties also punctually/regularly. (Copy of Attendance is annexed as F/B).
- That in the month of July-2023 when the appellant asking about salary in the bank, the authorities of bank informed that salary has been estopped by the department concerned.
- 6. Despite the facts that no departmental inquiry was conducted by appointment authority nor any proceedings initiated as per E&D Rules in vogue and the District Education Officer, Male Lakki Marwat directly dismissed the appellant from service.
- 7. That feeling aggrieved from the dismissal order of District Education Officer, Male Lakki Marwat being appointment authority submitted the instant Departmental Appeal before this Appellate Authority on the following grounds:

1629



GROUNDS:

- a) Now the Appointment Authority/District Education Officer, Male Lakki Marwat issued office order vide No.7508-15 dated 25-09-2023 regarding MAJOR PENALTY TO DISMISS THE APPELLANT FROM THE POST OF PRIMARY SCHOOL TEACHER BPS-12 GPS NO.1 MINA KEL LAKKI AND RECOVERY OF SALARIES, ALLOWANCES without initiating any departmental inquiry proceedings.
- b) The plea of the Competent Authority is that a complaint submitted by Mr.Shahzeb S/O Fazal Rabi R/O Mohallah Gul Wali Abad Lakki Marwat against the appellant regarding dual domicile certificates of different UCs and the ibid complaint was also forwarded by the Sub Divisional Education Officer Male Lakki Marwat vide letter No.560 dated 08-09-2023 for possessing double domicile certificates.
- c) The aforementioned complainant represents an affidavit in this aspect that no complaint was lodged against Mr.Hazrat Bilal S/O Khalil ur Rehman R/O Lakki City by mine (Copy of Affidavit is annexed as F/C).
- d) That even the aforesaid situation, the District Education Officer, Male Lakki Marwat adopted the lethargic attitude towards the finalization of appellant's re-instatement.
- e) That the appointment authority has not treated appellant in accordance with law, departmental rules, regulations and policy on the subject and has acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 & lawfully issued the dismissal office order, which is unjust, unfair, hence are liable to be set aside/declared as ineffective to the extent of appellant's rights.
- f) Sir, I am a poor man enabled residing with my parents, brothers & sisters and there is no source of income other than PST teacher.
- g) That instant departmental appeal is well within time and this Appellate Authority has got every jurisdiction to entertain and adjudicate upon the same.

In view of the above narrated facts, it is humbly prayed that office order No.7508-15 dated 25-09-2023 issued by the District Education Officer, Male Lakki Marwat may kindly be set aside and directed to re-instate the appellant into government service along with all consequential back benefits. I shall be very thankful to you for your this act of kindness.

[®]Appellant

Hazrat Bilal PST Government Primary School No.1

Mina Khel Lakki Mawat

Dated:

/10/2023

0313- 4609100





و كومت خيبر پختونخوا پاكستان

THE GOVT OF KHYBER PAKHTUNKHWA PAKISTAN



بيدائش مرشفيكيث

BIRTH CERTIFICATE

CRMS No: B112031-15-0284

FORM No: P004291073

درخواست دسنده کا نام: خلیل الرحمان درخواست دسنده کا شناختی کارد نمسر: 1120155390527 ع كا نام والدكا نام اشناختي كارة نمبر والده كا نام اشناختي كارة نمبر جس مدبب بيدائش كا صلع 1 تاريخ : شمع بی بی خليل الرحمان 1120155390527 15-3-1999 APPLICANT'S NAME: KHALIL UR REHMAN Son APPLICANT'S CNIC NO1120155390527 RELATION: CHILD's NAME FATHER'S NAME / MOTHER'S NAME / GENDER RELIGION: DISTRICT AND NIC NO DATE OF BIRTH DATE OF BIRTH LAKKI MARWAT SHAMA BIBI ISLAM KHALIL UR REHMAN MALE HAZRAT BILAL 1120155390527 GRAND FATHER'S NAME: UMAR GUL GRAND FATHER's CNIC NO: 28-4-2015 ناديل اندراج: ﴿ ﴿ لَيْكُ اندراج: إِسِ ينه: الدسمين باغ جوك، شهر لكي مروت، تحسيل: لكي مروت، صلع الكي مروت

NAME OF THE PARTY

TEMPOLA ALIE

DEANN

ADDRESS : NEAR SHEEN BAGH CHOWK, CITY: LAKKI MARWAT, TEHSIL: LAKKI MARWAT, DISTRICT: LAKKI MARWAT

ABSEMBLE AVA 28-4-2015 رستخط: لکی نمبر 1(031) صلع:لکی مروت

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NAME OF THE PARTY. ANG DEC. تاریخ آثراء:

سال في المام الما سنحدمت وت طلك كويت مريي منواست برای پشت پرایسے گئے ہیں کس کا اقراركرا بوں كرتهو كدو، أب كس 01 (49)

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he Pakistan Citizenship Act, 1951 (Act, II of 1951) Rules made thereunder (vide Rule No.23) __ Son / Daughter / Wife HALEEL LIR RAHMAN hereby declare that I was born of parents who are permanently Domiciled in Khyber Pakhtunkhwa Province, having belonged to it by birth/ settled in it. I belong to Village / Mohallah Ayau Toular Mark Kulail Lauks District Lakki Marwat. Signature / Thumb Impression of the Applicant HBS Name in Block Letters HAT RAT BILAL Dated: __ Pursuance to the declaration dated: /20 filed by Mr/Mrs/Miss HAZRAT RILAI S/O, D/O, W/O KHALEEL IR RAHMAN CNIC No _ domiciled in the Khyber Pakhtunkhwa Province. It is hereby certified that the said HAZRAT CHILAL is born of parents who are permanent residents of Khyber Pakhtunkhwa Province having belong to it by birth / settled in it. I have satisfied myself personally / through my relevant sources that the above declaration is true and duly certified overleaf. COUNTERSIGNED BY

Deputy Commissioner

Assistant Commissioner

الريارة كانقي لق كروا كري من المراج والمراج وا
اس بات کی تقیدیق کرتا1 کرتی ہوں کہاس سے پہلے میں نے کسی بھی ضلع کا ڈومیسائل سرٹیفیکیٹ حاصل نہیں کیا ہے۔
موبائل نبر <u>0342-9128 و يخط</u> انشان انگونفا <u>1884</u>
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ڈومیسائل سر ٹیفیکیٹ کے حصول کیلئے ضروری مدایات
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• ڈوملیمانگل سرٹیفیکیٹ حاصل کرنے کے لئے عمر کی کوئی حدثیں بلکہ امید وار کسی بھی وقت اور کسی بھی کلاس میں زیرتعلیم کیوں نہ ہو، ڈوملیمائل سرٹیفیکیٹ حاصل کرسکتا ہے۔ • وال ان کر ایسانی کر ایس نہری کر میں کا میں تقدیم میں میں ایسان کے ایسان کرسکتا ہے۔
 والدین لوچامین که دوه این بیج یک دومیال برونت بنوا بے۔ ایک سے دیادہ دور دسیال رکھنا قانوناً جرم ہے۔
• ایک امید دارایک وقت میں صرف ایک ڈومیسائل بنوانے کا حقد ار ہے۔
• جن امید دار دل کے پاس ایک سے زیادہ ڈومیسائل سرٹیفیکیٹ موجود ہوں اُن کو جاسے کہ وہ فوری طور بران میں سے صرف ایک این ایس جے بیاری اور
ہو۔ بالفاظ دیل سم امید دارکا کلیٹی طور پر جس صفع ہے تعلق ہوا کا قبلے کا ڈ ومیسائل سرٹیفیکیٹ اپنے باس رکھنے کا مجازے یا گرکو ڈیا کی سے زیادہ اجعلی ڈی و اکل کھنے
معظم الما يما يا ليا لونه مرف الساميدوار كے طلاف، بلكها من كے والدين اور تقعد كي كنندہ كے خلاف بھي قانو كي كاروائي كي جائيگے۔
ڈوملیائل سرٹیفیکیٹ فارم میں دیئے گئے کوا کف کی تقدیق مندرجہ ذیل افسروں انتخصیات میں ہے کی ایک ہے کروانالازمی ہے۔ ام رن کی بہوا یہ کی نظر کہتا ہے برمیں اکا میٹرف کی تاریخ ہیں اس
امیدداری مہولت کو مذظرر کھتے ہوئے ڈومیسائل مڑیفیکیٹ کی تقدیق کیلئے حکومت نے (9) نجاز حکام تعین کئے ہیں جن میں سے کی ایک سے تقیدیق کی جاستی ہے۔
سینیر زکن قومی اسمبلی زکن صوبائی اسمبلی سیکرٹری یونین کونسل جزل کونسلر استان استان کرنسلر کرنسلر استان کرنسلر کرنسلر استان کرنسلر استان کرنسلر استان کرنسلر استان کرنسلر استان کرنسلر کرنسل
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اُمیدوارکوچاہیئے کہ اپنائیمتی وقت بچانے کیلئے جلداز جلد ڈومیسائل سرٹیفیکیٹ حاصل کرے تا کہ میٹرک کاامتحان پاس کرنے کے بعدانہیں ڈومیسائل کے حصول
سیسے انظاراورز کی کا سامنانہ کرنا پڑے۔
Wanting Printers taskil 631208A-1-1-

