


12.08.2015

Counsel for the appellant, M/S Khurshid Khan, SO, Javed Ahmed, Supdt. and Muhammad Akram, Supdt. alongwith Assistant A.G for respondents present. Learned counsel for the appellant informed the Tribunal that the appellant has died. Requested for adjournment. To come up for further proceedings on 27.10.2015 before S.B.

  
Chairman

27.10.2015

None present for appellant despite repeated calls. M/S Hameed-ur Rehman, AD (lit.) and Sharifullah, ADO alongwith Assistant A.G for respondents present. Perusal of record would suggest that the appellant has died as this Tribunal was informed by the learned counsel for the appellant on the previous date. The appeal is disposed of accordingly. File be consigned to the record room.

  
Chairman

ANNOUNCED  
27.10.2015

27.10.15

12.02.2015

Counsel for the appellant, M/S Khurshid Khan, SO for respondents No. 1 to 3 and Muhammad Akram, Supdt. for respondent No. 4 alongwith Addl: A.G present. Requested for adjournment. To come up for written reply on 30.03.2015.

  
Chairman

30.03.2015

Counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 2 and Akram Khan, Supdt. for respondent No. 4 alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 4.6.2015 before S.B.

  
Chairman

04.06.2015

Counsel for the appellant and Mr. Akram Khan, Supdt for respondent No.4 alongwith Addl: AG for the respondents present. Written reply/comments not submitted. Requested for adjournment. Another last opportunity granted. To come up for written reply/comments on 12.08.2015 before S.B.

  
Member

26.08.2014

Appeal No. 601/2014  
Mr. Muhammad Ayub

Counsel for the appellant present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned order dated 26.12.2013 of respondent No.1 vide which major penalty of reduction to lower post was imposed upon the appellant. Against the impugned order the appellant filed representation before the respondent No. 1 to review the aforesaid punishment which was not responded within the statutory period on 90 days, hence the present appeal on 16.04.2014. Counsel for the appellant further stated that similar nature of appeal titled Mr. Shafi Ullah, Service Appeal No. 753/2014 has already been admitted and pending before the learned Bench-I, therefore, the instant appeal may also be clubbed with the above mentioned appeal.

Since the matter pertains to terms and conditions of service of the appellant, hence admit for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply. To come up for written reply/comments on 27.10.2014 before the learned Bench-I.

Member

Appellant Deposited  
Security & Process Fee  
Rs. 3,500/- Bank  
Receipt is Attached with File.

27.10.2014

No one is present on behalf of the appellant. M/S Khurshid Khan, S.O for respondent No.2 and Sharifullah, ADEO, Lakki Marwat for respondent No. 4 with Mr. Muhammad Adeel Butt, AAG for the respondents present. Written reply has not been received. To come up for written reply/comments alongwith connected appeal on 12.02.2015.

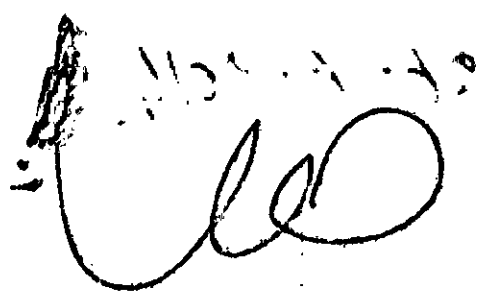
Chairman

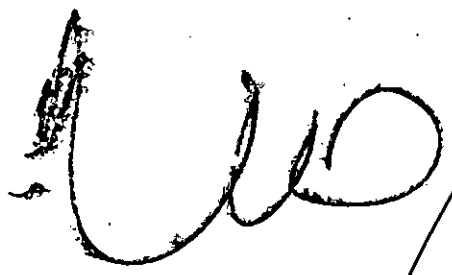
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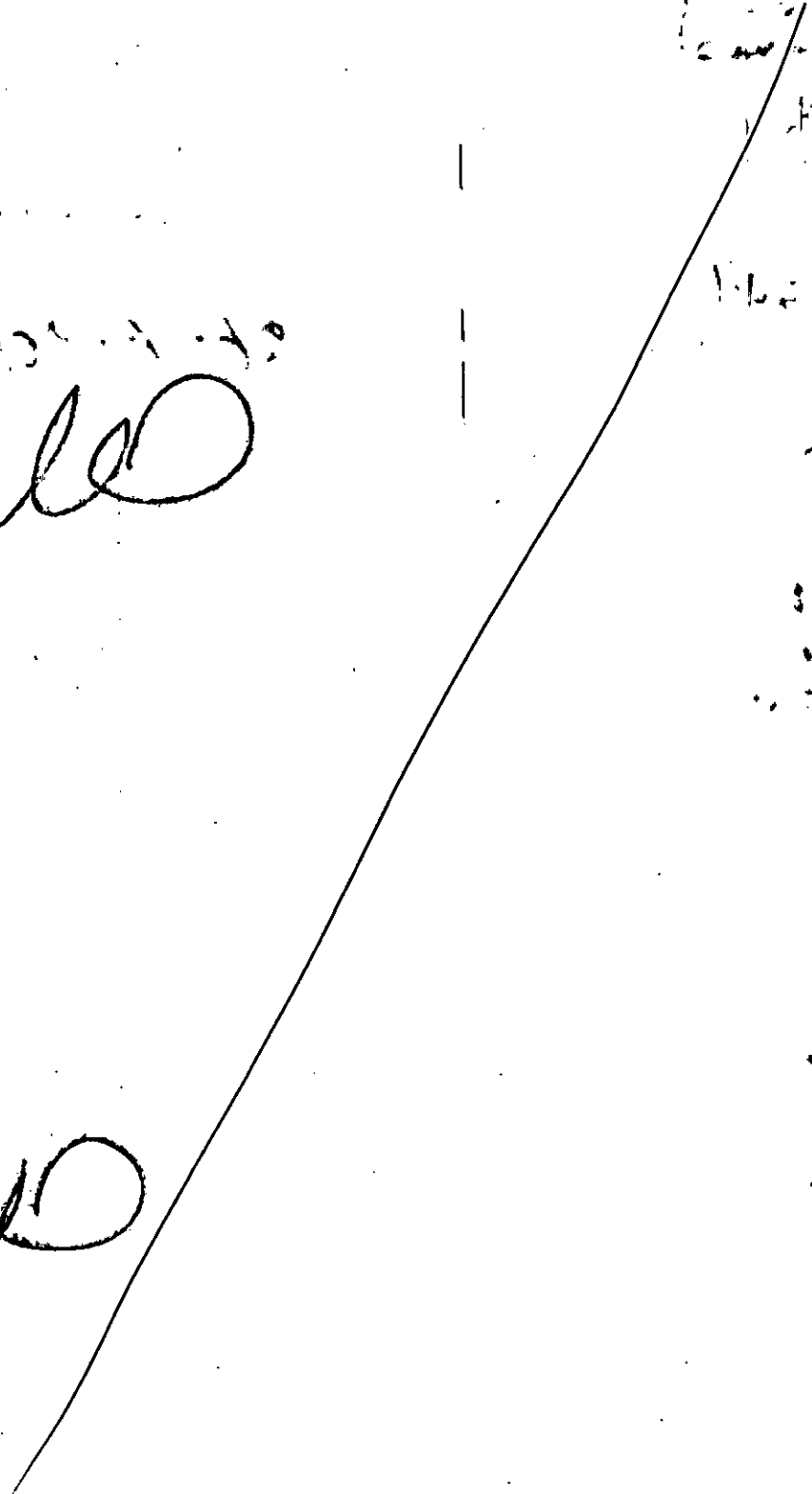
26.06.2014

Counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 25.08.2014.

  
Member



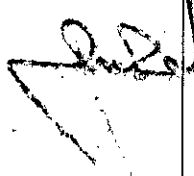







Form-A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 601/2014


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	29/04/2014 	The appeal of Mr. Muhammad Ayub Khan resubmitted today by Mr. Muhammad Tariq Qureshi Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.  REGISTRAR
2	8-5-2014 	This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>26-6-2014</u> .  CHAIRMAN

The appeal of Mr. Muhammad Ayub Khan Principal GHSS Tajazia Lakki Marwat received today i.e. on 16.04.2014 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of reply to charge sheet mentioned in para-4 of the memo of appeal (Annexure-E) is not attached with the appeal which may be placed on it.
- 3- Annexure H of the appeal is incomplete which may be completed.

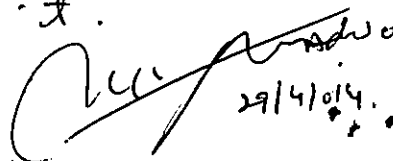
No. 613 /S.T.

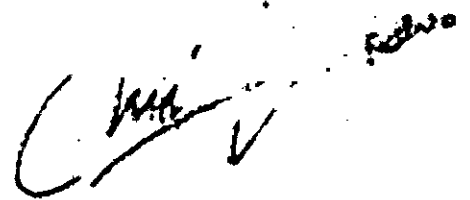
Dt. 16/04 /2014.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA - 4a  
PESHAWAR.

APPLICATION -  
Mr. Muhammad Tariq Qureshi Adv.  
High Court Lakki Marwat.

Sir, I have removed all above objection  
Now only recommendation is only on two pages 20, 21. No  
more copy/page of said recommendation has been given.  
So please, re-submit it.

  
29/4/14.



①

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR**

S.A No. 601 / 2014

Muhammad Ayub Khan

Appellant

Versus

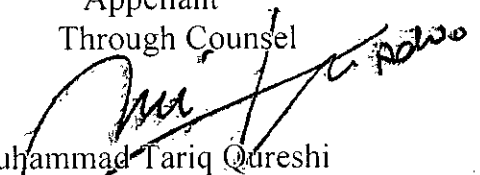
Chief Minister, Govt. of KPK through Chief Secretary and others


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Dated: 19-03-2014

Muhammad Ayub Khan Khan  
Appellant  
Through Counsel

  
Muhammad Tariq Qureshi  
Advocate Lakki Marwat



①

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR**

S.A No. 601 / 2014

Muhammad Ayub Khan S/O Atta Ullah Khan Presently Principal Govt:  
High Secondary School Tajazia District Lakki Marwat.

Appellant

1. Chief Minister, Govt. of KPK through Chief Secretary, Govt. of KPK Civil Secretariat, Peshawar.
2. Secretary, Government of KPK Elementary & Secondary Education Department, Peshawar.
3. Director of Education, Directorate of Elementary & Secondary Education, KPK Peshawar.
4. District Education Officer (Male), Elementary & Secondary Education, Lakki Marwat ..... Respondants

*ADJUTANT -*

**APPLICATION FOR SUSPENSION OF THE ORDER DATED: 26-12-2013**  
**OF RESPONDENT NO.1**

**Respectfully Sheweth:-**

- 1) That, the above captioned case has been instituted in shape of service appeal in this Honorable Court.
- 2) That, the appellant case is prima facie and balance of convenience also, *tilts* towards appellant.
- 3) That, after the order in question, appellant is working on his prior position i.e. as a principle Govt: High Secondary School Tajazia but respondents are at their best to gave the appellant to lower grade on the basis of impugned order which is not as per law and the same must be suspended till the disposal of case/appeal otherwise appellant would get irreparable loss.

So in circumstances above, the order dated: 26-12-2013 may kindly be suspended till the disposal of instant appeal by leaving the appellant on BPS-18 (Prior Possessing Grade).

Dated: 19-3-2014

Appellant  
Through

*Muhammad Tariq Qureshi*  
Muhammad Tariq Qureshi  
Advocate High Court  
Lakki Marwat



3

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR**

S.A No. \_\_\_\_\_ / 2014

Muhammad Ayub Khan S/O Atta Ullah Khan Presently Principal Govt:  
High Secondary School Tajazia District Lakki Marwat.  
Appellant

573  
16-4-2014

1. Chief Minister, Govt. of KPK through Chief Secretary, Govt. of KPK Civil Secretariat, Peshawar.
2. Secretary, Government of KPK Elementary & Secondary Education Department, Peshawar.
3. Director of Education, Directorate of Elementary & Secondary Education, KPK Peshawar.
4. District Education Officer (Male), Elementary & Secondary Education, Lakki Marwat ..... Respondants

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST OFFICE NOTIFICATION NO. SO (S/M) E&SED / 4-17/2012, DATED 26-12-2013 OF RESPONDENT NO. 1 WHERE BY MAJOR PENALTY OF REDUCTION TO LOWER POST WAS IMPOSED TO APPELLANT FOR NO LEGAL REASON.**

**Respectfully Sheweth:**

Short facts giving rise to the present appeal are as under:-

1. That appellant has been working as District Officer Male since 24-4-2008 in the office of District Education Office Lakki Marwat
2. That, The inquiry was conducted by Muhammad Salim Khan Principle GCMHS Tank and Hamidullah ACO D.I.Khan as inquiry officer and submitted the inquiry report on dated: 23-06-2011 without giving the opportunity of personal hearing and defense. The said inquiry was initiated but was not conducted as per the mandate of law, because neither statement of any witness was recorded in the presence of appellant nor afforded opportunity of cross examination being mandatory. After it, the appellant was served with charge sheet and appellant replied by denying the allegations. Copies of inquiry report and reply are annexed as Annexure "A & B".
3. That, on dated 31-12-2012, secretary / respondent no. 2 appointed another inquiry through letter no "so (S/M) E & SED/4-17 / 2012" and appointed Mr.Hamayun Khan as inquiry officer on dated 8-1-2013, the inquiry officer initiated the inquiry and issued charge sheet & statement of allegation, copies of notification and charge sheet are annexed herewith as Annexure "C & D".

16/4/14

re-submitted to  
and filed,

29/4/14

- (47/00)
4. That, the 2<sup>nd</sup> charge sheet was replied by appellant in aforesaid manner. Copy of reply is Annexed as Annexure "E".
  5. That, on dated: 17-04-2013, the appellant was served with showcase notice on the basis of aforesaid allegations. Which was replied on dated: 17-5-2013 in the afore said manner. Copies of showcase notice and reply are Annexed as "F & G".
  6. That, inquiry report / recommendation was submitted. In said inquiry report it was alleged that the (appellant) M. Ayub Khan D.O (Male) and Shafiullah (HRDO) representative of DCO signed the merit list, they are equally responsible. And Mr. Muhammad Ayub Khan DO appointed his own son against reserve quota of disable person, "both the officer may be reverted to lower post". Copy of recommendation / inquiry report is annexed as Annexure "H".
  7. That, on dated: 26-12-2013 major penalty of reduction to lower post was imposed by the Chief Minister (Respondent No.1) upon appellant, which order was issued by secretary (Respondent No.2). Copy of notification is Annexed as Annexure "I".
  8. That, appellant submitted review / representation before Respondent No.1 to review the aforesaid punishment which met dead response till date. Copy of review is Annexed as Annexure "J".

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

**Grounds:-**

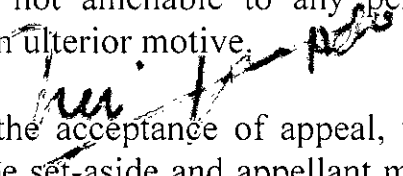
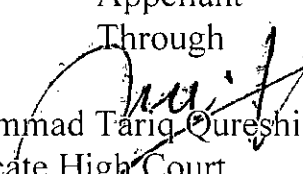
1. That, in the inquiry, the impossible thing has been imputed to the appellant and pure and bonafide appointment of petitioner's son is being inferred as fake and against merit. Though it is strictly on merit. In other words, it leads to a statement that a candidate even being on the criterion, cannot be appointed in the department where his father works?
2. That, the appellant has been requited for his best services in the shape of degradation. The inquiry officers statement is baseless and result of animosity.
3. That, appellant son has been duly appointed by DEO after DSB's approval and observances of all the codal formalities. The remarks put against appellant can never be expected by an illiterate person just on the dint of these remarks, Appellant has been degraded from BPS-18 to BPS-17.
4. That, the inquiry officer, further suggests that all the appointments made without referring codal formalities like advertisement, merit list and DSB's approval etc may be terminated as far as this exception is concerned, the appellant has been a part/member to just three DSB's

and declared these three DSB's as defacto DSBs. Then why the appellant has been degraded? And why only a member is being penalized from the whole DSB?

5. That, the appellant has been degraded to lower post which is against the law and very norms of justice.
6. That, inquiry was not conducted as per the mandate of law. Neither any statement of any witness was recorded in the presence of appellant nor he was afforded opportunity of cross examination.
7. That, the procedure lapses took place in dealing with the mater, so on this score alone, he was not liable to any punishment.
8. That, personal hearing, being mandatory, was not afforded to appellant what to speak of providing him opportunity of self defense.
9. That, the show cause notice did not bear complete inquiry proceeding which was mandatory to reply the notice as per the mandate of law.
10. That, appellant, being employee, was not amenable to any penal action, so the impugned order is based on ulterior motive.

It is therefore, most humbly prayed that on the acceptance of appeal, the order dated: 26-12-2013 of respondent no. 1 be set-aside and appellant may kindly be restored / re-instated on prior / previous basic pay scale 18 with such other relief as may be deemed proper in circumstances of the case.

Dated: 19-3-2014

  
 Appellant  
 Through  
  
 Muhammad Tariq Qureshi  
 Advocate High Court  
 Lakki Marwat

2 49

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR**

S.A No. \_\_\_\_\_ / 2014

Muhammad Ayub Khan

Appellant

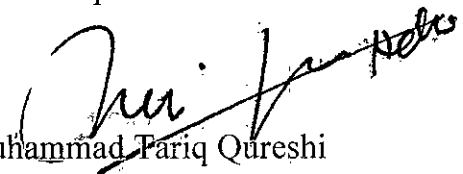
Versus

Chief Minister, Govt. of KPK through Chief Secretary and others

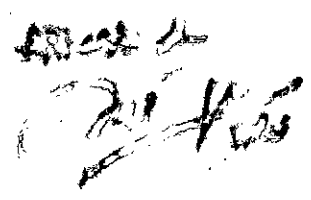
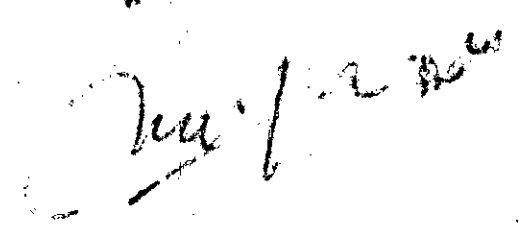
**AFFIDAVIT**

I, Muhammad Tariq Qureshi Advocate hereby solemnly affirm and declare on oath that the service appeal are true and correct to the best of my knowledge and belief. Nothing has been concealed from this Court.

Deponent



Muhammad Tariq Qureshi  
Advocate



INQUIRY REPORT**Title of inquiry**

Inquiry into the complaint against Mr. Noor Hassan Ex-EDO (E&SE) Lakki Marwat.

**Inquiry officers**

1. Mr. Muhammad Salim  
Principal, GCMHS, No.1 Tank.  
(Chairman, I/C)
2. Mr. Hameed Ullah Shah  
ACO, D.I.Khan  
(Member, I/C)

**Place of inquiry**

Office of the EDO (E&SE) Lakki Marwat.

**Background of the inquiry**

The Govt. of KP, constituted the above cited inquiry committee, vide notification No.-SO(AB)4-4/Inq/Lukky/2011, dt-29/3/2011, to conduct preliminary inquiry into the complaints and allegations leveled against Mr. Noor Hassan Ex-EDO (E&SE) Lakki Marwat, regarding illegal appointments in various teaching cadres in District, Lakki Marwat.

**Mechanism of the Inquiry**

Questionnaires were served upon the Ex-EDO and other concerned officers/officials, in order to find out the facts (Annex: 1-18). Moreover, satisfactory opportunity and ample of time was allocated for hearing and cross examination with the concerned officers and other departmental representative before reaching any conclusion. All the available record, pertaining to the appointment orders of various cadres, was thoroughly examined. However, some very important record, pertaining to the current recruitments, was found missing and despite of our repeated requests, it was not provided by the officers/officials concerned (Annex: 19). The delay in provision of record, not only delayed the task assigned, but also made it difficult to probe appropriately into the matter. Similarly, a lot of other written complaints received by the committee were also examined and considered during enquiry proceedings.

**OBSERVATIONS**

The Ex-EDO performed his duties w.e.f March 14, 2009 till the posting of incumbent EDO of management cadre on February 28, 2011. During his tenure a consolidated advertisement for recruitment against vacant posts of different teaching and non teaching cadres (No of posts not indicated in the advertisement) was published in daily news paper "the Aaj" dated 11-05-2010 (Annex: 20).

In response, a large number of applications were received and necessary process for all the cadres was completed except TT, AT (Female) and PST (Male) due to status quo, granted by Peshawar High Court Bench D.I.Khan (Annex:21-22). However, recruitments have also been made in PST (Male) and TT (Female) in violation of court orders. During the detail scrutiny of record it was revealed that a lot of irregularities have been carried out in the said recruitment process. e.g.:

- ❖ Mostly, merit has been violated in all cadres.
- ❖ A lot of appointment orders have been issued under irrelevant and illegal quotas like Ex-Serviceman's son quota, retired employee's son quota, shaheed brother/sister's quota, Class IV servant's quota, besides irrelevant court references.

Attested

*[Signature]*

- ❖ Necessary codal formalities i.e. availability report of vacant posts, allocation of UC and open merit quota, disable quota, proper meeting of DSC, notification of interview panel, consolidated appointment orders, verification of documents prior to appointment orders etc have not been complied with.
- ❖ Proper record, related to appointment process, have not been duly maintained & looked after.
- ❖ Overage and ineligible candidates have been appointed.
- ❖ Some very important record pertaining to the current appointments of various cadres is missing.

In the following paragraphs these irregularities have been elaborated in detail.

#### PST (Male)

In this cadre numerous applications were received, tests and interviews were conducted and tentative merit list was prepared, but no further process was carried out due to status quo granted by the Honorable Peshawar High Court Bench D.I.Khan (Annex:22).

The incumbent DO (Male), the dealing hand and the litigation in-charge, in their written statements, have clearly narrated that no further recruitment process (preparation of final merit list and meeting of DSC) was carried out due to the said status quo (Annex:2,11,15,23)

Despite the above mentioned facts, the Ex-EDO has issued 33 No. of appointment orders in this cadre at various intervals in piecemeal. Copies of these appointment orders are attached as (Annex: 24). Three out of these 33 appointment orders, issued under deceased's son quota vide No 12516-27 dated 21-12-2010, No725-30 dated 18-01-2011 and No 1647-52 dated 21-02-2011, are justified and according to the rules. Out of these 33 orders 28 have been implemented and the teachers appointed, are getting their salaries regularly since assuming their charge.


As no recruitment process i.e. preparation of final merit list and approval of DSC etc. has been carried out in this cadre, therefore, all the appointment orders except issued under deceased son's quota as mentioned above are illegal and baseless. The irregularities, pointed out in the orders, can be perused in the irregularities & remarks columns of the statement attached as (Annex: 25.)

In addition to these orders the Ex EDO has also issued 11 appointment orders of PST Male prior to the advertisement appeared on 11-05-2010, in piecemeal without following the requisite process (Annex:26). All these orders are illegal and unjustifiable. Their complete record was not available in the office.

Ironically, two appointment orders have been issued to one person under different references under the same order No: and date (Annex: 27).

#### PST FEMALE

Applications for the PST (Female) under the advertisement appeared on 11-05-2011, were received and the process was completed. The Ex- EDO has issued 59 appointment orders in this cadre (Annex: 28), whereas the total number of vacancies in this cadre as reported by Dy; D.O (Female) was nineteen only. (Annex: 29). Out of these 59 appointment orders 39 orders have been issued through a consolidated notification approved by DSC, while the rest of the orders have been issued in piecemeal without formal approval of DSC. During the detail examination of the record, it was found that only six orders, one under deceased son's quota vide order No 40-46 dated 24-01-2011 and five under open merit at S No 5,7,8,11 and 12 in the consolidated appointment notification No 2074-79 dated 25-02-

Attested  


(6)

2011 are justified and according to the merit as per available record. But their documents require verification and the vacancies need confirmation.

A lot of irregularities were noticed in the remaining 53 appointment orders. The detail of these irregularities can be perused in the irregularities & remarks columns of the statement attached as (Annex: 30).

Three of appointment orders have also been issued by the Ex-EDO prior to the advertisement, published on 11-05-2010. All these orders are illegitimate and baseless as these orders have been issued without observing requisite codal formalities i.e. advertisement the posts, preparation of merit list and approval of DSC etc (Annex: 31). These three appointees are getting their salaries regularly. Their complete record was not traced out in the office.

#### CT MALE

The vacancies of CT male were advertised in the consolidated advertisement published on 11.05.2010. The applications were received and the process was completed. Minutes of the DSC were approved. The Ex-EDO issued 14 appointment orders in this cadre, 09 under a consolidated notification while 04 in piecemeal without preparation of merit list and approval of DSC (Annex: 32).

Gross irregularities have been made in 08 out of 14 orders, issued under the consolidated notification and in piecemeal. The detail of these irregularities can be read in the irregularities & remarks columns of the statement attached as (Annex: 33).

In addition to these appointment orders, the Ex-EDO, has also issued 03 appointment orders in this cadre prior to the advertisement appeared on 11-05-2010, without following the requisite procedure i.e. advertisement, preparation of merit list and approval of DSC etc (Annex: 34). All these appointments are illegitimate and unjustified. Their complete record was not available in the office.

#### CT FEMALE

The applications for CT (F) were received where the Ex-EDO issued 22 appointment orders in this cadre against eighteen vacant posts as reported by dealing assistant (Anex: 35,36)

20 appointment orders have been issued in the consolidated form, whereas 02 were issued in piecemeal without final merit list, approved by DSC. A lot of anomalies have also been observed in 12 out of 22 appointment orders. The detail in given in the irregularities & remarks columns of the statement attached as (Annex: 37)

One of the candidates, named Fareeda Khanum D/O Bahadar Shah has been dropped for unknown reasons in spite of her second position in merit list (Annex: 38). Likewise, two other candidates Miss Nargus Noureen D/O Khan Badshah and Rehana Gul D/O Muhammad Qasim (disabled quota), recommended for appointment by DSC, have not been appointed for unknown reasons (Annex: 39).

#### GROSS IRREGULARITIES IN THE APPOINTMENT ORDERS OF TT (F), QARI (M) LAB: ASSITT:(F) DM (MALE) AND DRIVER.

##### 1 Theology Teacher (TT) (Female)

The incumbent DCO Lakki (Muhammad Ayaz Mendo Khel) with the consultation of Ex-EDO (E & SE) Lakki, advertised the vacancies of TT Female in daily "The Aaj" on 11-06-2011. It was clearly declared in the press cutting that no one would be allowed to apply under disabled quota for the reason that no vacant position was available in the said quota.

Aweshed

*[Handwritten signature]*

⑦

Annex:40). Test and interview were held and final merit list was prepared, but was not approved by DSC, due to status quo granted by Peshawar High Court Bench, D.I.Khan (Annex:21)

The incumbent DO male secondary has stated in his written statement that no recruitment process (approval of final merit list and appointment order etc) has been carried out in this cadre due to status quo granted by the Honorable Court (Annex: 23).

In spite of the above mentioned facts, two appointment orders of TT (Female) have been issued illegally and unlawfully. The detail is as under:

- 1 One of the candidates named Gulshan Bibi D/O Abdul Manan, applied for the post and her case was submitted to DCO Lakki for approval of appointment under disable category. A separate merit list consists of only one candidate was prepared and approved by the members of DSC. Violating the court decision, the DCO approved the case and she was appointed against TT Post.(Annex: 41).

It is pertinent to note that no applicant was allowed to apply under disable quota and hence, other deserving candidates remained deprived as they did not apply for.

- 2 One Miss: Shahzadi Ambreen D/O Muhammad Yousaf, Qaria at G.G.H.S.No.3 Lakki was adjusted/ appointed against TT at GGMS Tajori, Lakki. Her name was not included in test and interview lists. The relevant record was not traced out in the office. However, she is drawing her pay & allowances regularly in BPS-14 since December 2010 under personal No.0556821. Hence both the appointment orders are illegal and baseless (Annex: 42).

## 2. Qarri (Male)

While going through the record in hand, it was found that an application of Mr. Saleem Dil Khan Brother of sepoy Khush Dil Khan (Shaheed), requesting for appointment as J/C, was recommended by Lt Col: 40<sup>th</sup> Battalion the Frontier Force Regiment Kohat to the EDO (E&SE) Lakki for favorable consideration. The Same application was forwarded to the DCO Lakki with remarks, that as there was no vacant post of J/C, the applicant may be appointed against Qari post, lying vacant. The DCO agreed to the proposal and the applicant was appointed against Qari post. (Annex: 43). As the appointment has been made without advertisement and preparation of merit list, it is, therefore, illegal and baseless. Moreover, there is no such quota reserved under the current recruitment policy.

## 3. Lab: Assistant.

The Ex-EDO (E-SE) Lakki Marwat appointed Mst; Najma Bibi D/O Haq Nawaz as Lab: in charge in BPS-07 under No.2368-73 dated 12-03-2010 at GGHS Shahbaz Khel Lakki Marwat without any advertisement(Annex: 44). Her application and proper file was not available in the office. No test and interview was conducted and thus the appointment orders are illegal and irregular. She is drawing her salary regularly since taken over charge.

## 4. DM (Male)

The EDO (E&SE) Lakki Marwat advertised the posts of DM in Daily "The Aaj" on 16-10-2008. (Annex: 45). Test and interview was held, final merit list was prepared and approved by DSC and a consolidated appointment orders was issued on 06.03.2009 (Annex: 46). Later on, the Ex-EDO Lakki Noor Hassan Khan issued 02 appointment orders illegally under different references. One Mr. Feroz Khan who had not even applied for the post was appointed under session-wise category. The 2<sup>nd</sup> one Mr. Farman Ullah S/O Wali Khan having lowest merit was appointed under court reference. He was at S.No.05 and 06 in the open and session wise merit lists respectively and the candidate at S.No.2,3 and 4 were deprived of their due rights (Annex:47-48).

Complete record of both the appointment orders was also not available in the office:

Attested

*[Handwritten Signature]*



**5. DRIVER**

The Ex-EDO (E-SE) Lakki Marwat advertised the post of Driver in Daily "The Aaj" on 11-05-2010 (Annex:20). The candidates having S.S.C and LTV license were eligible to apply for the post. Applications were received and a list consists of 90 candidates was prepared. The motor vehicle examiner Lakki Marwat recommended 03 candidates for recruitment. The one Mr. Sohail Ahmed S/o Abul Hassan, an illiterate and ineligible for the post, was placed on the top of the list. He was appointed as a driver by the Ex-EDO, violating the merit and basic criterion of current recruitment policy (Annex:49).

**FINDINGS OF THE INQUIRY**

1. In view of the above narrated facts and from the perusal of the record, the committee came to the conclusion that 127 illegal appointment orders in different cadres have been issued in violation of merit, Govt: policy and requisite procedure. Due to this illegal practice, not only the deserving and eligible candidates were deprived of their due rights but it also caused a huge loss to the public exchequer. Being appointing authority, Mr: Noor Hassan Ex-EDO (E&SE) Lakki Marwat is responsible for all these illegal appointments and huge loss to the Govt: exchequer.
2. The members of DSC i.e. Mr: Muhammad Ayub Khan, DO and Mr: Shfiulah Khan, HRDO (Representative of the DCO Lakki), who have signed fictitious and fake merit lists and approved some illegal quotas, are also responsible for violation of merit, Govt: policy/ procedure, and assisting and supporting the Ex-EDO Mr: Noor Hassan Khan in making illegal appointments, which caused a huge loss to the public exchequer.
3. From the perusal of available record, pertaining to the current recruitment made in Feb: 2011, it has also been confirmed that
  - a. Merit of PST (F) and CT (F) has been violated.
  - b. Office record has not been properly maintained and looked after.
  - c. Ineligible candidates have been allowed to appear in the appointment process.
  - d. Wrong entries of score i.e. academic and other have been made while preparing these lists.
  - e. Fictitious merit lists have been approved by the members /participants of DSC.

As Mr. Amanullah Khan H/C, Mr. Bahadur Zaman S/C and Mr: Haroon Badsha J/C are the dealing hands of their respective cadres, custodians of official record and signatories of the minutes of DSC approved on 24/2/2011. They, therefore, are responsible for gross negligence, supporting and assisting the Ex-EDO in making illegal appointments in violation of merit, Govt: policy/procedure which caused a huge loss to public exchequer.

4. Irregular payment of pay and allowances has been made, particularly to PST (M) by the DDO concerned, in violation of Court orders, the notification issued by the sitting EDO and even during the inquiry proceedings (Annex:50)
5. Being Drawing & Disbursing-Officer of PST (Male), Mr. Noorani Shah Dy DO Primary (M) is responsible for gross negligence and irregular payment, causing huge loss to the public exchequer.

Attested

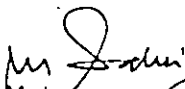
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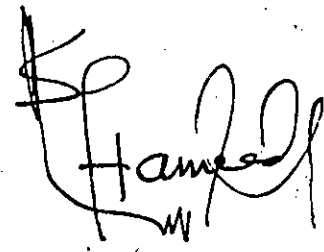
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## RECOMMENDATIONS

As a sequel to what has been explained above, the committee unanimously recommends

- a. All the illegal appointment orders issued on or after 11-05-2010, may be cancelled forth with and recovery of pay and allowances, where involved, may be made from Mr:Noor Hassan Ex:EDO and the Drawing and Disbursing officers concerned and a committee comprising senior officers of school cadre not less than BPS-17, may be constituted to scrutinize the whole procedure and prepare transparent merit lists of all cadres in order to appoint eligible candidates after observing necessary codal formalities particularly verification of documents prior to their appointment orders under consolidated advertisement appeared on 11-05-2010.
- b. All the officials/teachers appointed illegally prior to the advertisement published on 11-05-2010 may be terminated and recovery of pay and allowances may be made from Mr Noor Hassan Ex:EDO and the DDO's concerned.
- c. Not only Mr Noor Hassan Ex EDO, Lakki but all the helping hands such as members of DSC, Mr Muhammad Ayub DO and Shafi ullah Khan HRDO (o/o The DCO Lakki), DDO of PST(M) Noorani Shah Dy Distt:Officer, dealing assistants, Haroon Badshah J/C, Bahadur Zaman S/C, Amanullah H/C may be charge sheeted.
- d. It is also recommended that the competent authority may also be approached for initiating necessary legal action against the DCO Lakki Marwat and others for according illegal and unlawful approval in two cases explained at S No: 1(a) & 2 under the caption "Gross irregularities in the appointment orders of TT (F), Qari(M), Lab; Assistants (F) DM (F) and Driver".
- e. All officials (O/Asstt, J/C and S/Clerks) having a tenure more than two years and particularly involved in the current recruitment process may be transferred from EDO(E&SE) office Lakki Marwat immediately.
- f. Other serious irregularities have also, been observed in the appointment orders of class IV servants and J/Clerks which needs separate inquiry also.

  
Mr. Muhammad Salim  
Principal, GCMHS, No.1 Tank.  
(Chairman, I/C)

  
Mr. Hameed Ullah Shah  
Assistant Coordination Officer,  
Dera Ismail Khan  
(Member, I/C)

Dated: 23.06.2011

Attested



To


~~Chairman,~~  
The Inquiry Committee

Serial wise replies to the questions are outlined below.

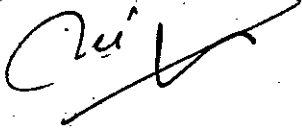
1. I am working as District Officer male since 24-04-2008
2. Most of the official business in the office of E.D.O (E&S) Education routed through proper procedure but not the all. Some time EDO signed office order with out proper procedure/file.
3. Tentative and final merit list of CT (M), CT (F) and PST (F) have been prepared by concerned-dealing Assistant checked and list of candidates for appointment have been prepared , signed by DSC and order were issued by E.D.O. The undersigned only checked the merit list with the interview list prior to sign to it.
4. Due procedure was followed in the appointment of CT (M&F) and PST (F) by participating all the DSB members. But I think verification of certificates/degrees should be made before appointment which was not done due to already delayed process of appointment.
5. No I have not issued any single appointment order in February, 2011
6. After advertisement the whole process of PST (F) including entries in the computer, test, interview, tentative, final merit and orders were carried out by Mr. Haroon Badshah J/Clerk female Establishment Branch, similarly CT (M) by Mr. Mir Ajab Assistant Establishment branch male and CT(F) by Mr. Baharadar Zaman S/Clerk female Secondary branch. All the business was distributed by E.D.O but I don't know either verbally or in black and white.
7. The Tentative merit list was displayed on the notice board for the candidates to check their position and to submit the applications in case of any mistake in the tentative merit list.
8. All the relevant record of the appointment of CT (M&F) and PST (F) ordered through DSB on 25-02-2011 are present with the dealing Assistant/clerks. I don't know about orders issued with out the DSB.
9. Each and every application of the CT(M&F) and PST(F), after the display of tentative merit lists, was checked and signed by the E.D.O and suitable directions were given to the dealing assistants/clerks to redress the genuine reservations.
- X. The said status quo is still continued and no PST order has been issued by file through the undersigned.
10. Tentative merit list was prepared from the interview list and final merit list was checked with the interview list, application forms and attested photo copies of the testimonials of the candidates.
11. Only one meeting on 24-02-2011 was attended by the undersigned.

Attested  


12. On 24-02-2011 the DSC meeting under the chairmanship of E.D.O and Members District Officer,(M) E&S and Representative of District Co-ordination Officer Lakki Marwat Mr. Shafiullah Khan HRDO office of District Co-ordination Officer Lakki Marwat was held.
13. Prior to signing the minutes of DSC, I have checked the final merit list with the interview list and application forms of the candidates, vacancies detail was given by the dealing Assistant/clerks to the E.D.O not to me.
14. The appointments of 39 PST (F), 22 CT (F) and 09 CT (M) were approved through file by the undersigned and I don't know with out above mentioned orders.
15. This was the task of dealing assistant and I have nothing to do with it. However, due to frequent power failure apart of the work was done in the house of E.D.O.
16. In the DSC meeting, recommendations under special quota, denied candidates (PST), Disable quota and Ex-Service man quota has been made and the same has been done through the instructions of E.D.O.
17. I have no information about the corruption of E.D.O, nor any one reported about allegation of corruption against him.

  
Muhammad Ayub  
District Officer (M)  
E&S Education Deptt: Lakki Marwat

Attested





(12) Annex B/C

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

**NOTIFICATION**

Dated Peshawar the December 31, 2012

**NO.SO(S/M)E&SED/4-17/2012/Noor Hassan Khan Ex-EDO Lakki:** The Competent Authority is pleased to appoint Mr. Muhammad Humayun, Chairman (BS-21) Provincial Inspection Team, Khyber Pakhtunkhwa, Peshawar to conduct enquiry against Mr. Noor Hassan Khan, Ex-Executive District Officer (BS-19) E&SE Lakki Marwat (Now Principal GHSS Khesghi Payan District Nowshera) and others to probe into the allegations leveled against them in the Charge Sheets and Statements of Allegations with immediate effect.


2. The enquiry officer shall submit recommendations/ report to the Competent Authority within thirty (30) days. (Copies of charge sheets & statements of allegations are enclosed).

**SECRETARY**

**Endst: of even No. & Date**

Copy forwarded to the:

1. Mr. Muhammad Humayun, Chairman (BS-21) Provincial Inspection Team, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Mr. Noor Hassan Khan, Ex-Executive District Officer (BS-19) E&SE Lakki Marwat (Now Principal GHSS Khesghi Payan District Nowshera).
4. Mr. Muhammad Ayub, District Officer (Male) E&SE Lakki Marwat (Copies of Charge Sheet & statement of allegations are enclosed).
5. Mr. Noorani Shah, Deputy District Officer (M/P), E&SE Lakki Marwat (Copies of Charge Sheet & statement of allegations are enclosed).
6. Mr. Amanullah, Head Clerk Office of the EDO E&SE Lakki Marwat (Copies of charge sheet & statement of allegations are enclosed).
7. Bahadur Zaman, Senior Clerk Office of the EDO E&SE Lakki Marwat (Copies of charge sheet & statement of allegations are enclosed).
8. Mr. Haroon Badshah, Junior Clerk Office of the EDO E&SE Lakki Marwat (Copies of charge sheet & statement of allegations are enclosed).
9. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
10. PS to Additional Secretary, E&SE Department, Khyber Pakhtunkhwa.
11. Office order file.

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

*Handwritten notes and signatures in the bottom left corner, including the word 'Noted' and a signature.*

Registered (13)



## Provincial Inspection Team K.P

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

Tele: 9210956-9212270

No. 1529-25/INSP/ /PIT/2013

Dated: January 08, 2013

To

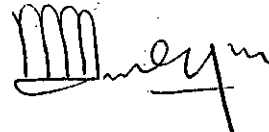
1. Mr. Noor Hassan Khan,  
Ex-Executive District Officer (BS-19) E&SE Lakki Marwat  
(Now Principal GHSS Kheshgi Payan District Nowshera).
- ✓ 2. Mr. Muhammad Ayub,  
District Officer (Male) E&SE Lakki Marwat.
3. Mr. Noorani Shah,  
Deputy District Officer (M/P), E&SE Lakki Marwat.
4. Mr. Amanullah,  
Head Clerk Office of the EDO E&SE Lakki Marwat.
5. Bahadur Zaman,  
Senior Clerk Office of the EDO E&SE Lakki Marwat.
6. Mr. Haroon Badshah,  
Junior Clerk Office of the EDO E&SE Liakki Marwat.

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

Memo,

According to Elementary and Secondary Education Department Notification No. SO(S/M) E&SED/4-17/2012/Noor Hassan Khan, Ex-EDO, Lakki, dated 31-12-2012 the Chief Minister Khyber Pakhtunkhwa has been pleased to appoint the undersigned as Inquiry Officer. I have been asked to conduct inquiry regarding irregular appointments in different cadres & other irregularities mentioned in the charge sheets and statement of allegations and submit report within one month. A copy of charge sheet and statement of allegation is attached.

2. You are directed to submit your written reply within seven days failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you. You are also asked to intimate whether you desire to be heard in person or otherwise.

 8.1.13

**MUHAMMAD HUMAYUN  
INQUIRY OFFICER  
CHAIRMAN,  
PROVINCIAL INSPECTION TEAM**

Encl as above.

Endorsement No & Date of Even:

Copy forwarded to.

- 1). The Secretary, to Govt. of Khyber Pakhtunkhwa, E&SE Department with the request that a departmental representative may be nominated to assist and appear before the inquiry officer along with relevant record.

  
INQUIRY OFFICER

(17)

Amir Haider Khan Hoti

**CHARGE SHEET**

I, Amir Haider Khan Hoti, Chief Minister, Khyber Pakhtunkhwa as Competent Authority, hereby charge you, Mr. Muhammad Ayub, District Officer (BS-18) E&SE Lakki Marwat, as follows:-

That you, while posted as District Officer (BS-18) E&SE Lakki Marwat committed the following irregularity:

**"Being member of DSC committed irregularity by signing fictitious and fake merit lists and approved some illegal quotas in violation of merit, Government Policy and Procedures and supporting the Ex-EDO E&SE Lakki Marwat in making illegal appointment."**

- 2- By reason of the above, you appear to be guilty of misconduct under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.
- 3- You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the inquiry officer/ inquiry committee, as the case may be.
- 4- Your written defence, if any, should reach the inquiry officer/ inquiry committee within specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
- 5- Intimate whether you desire to be heard in person.
- 6- A Statement of Allegations is enclosed.

A. H.  
**(AMIR HAIDER KHAN HOTI)  
CHIEF MINISTER KHYBER PAKHTUNKHWA  
COMPETENT AUTHORITY**

Mr. Muhammad Ayub, District Officer (BS-18)  
Elementary & Secondary Education Lakki Marwat.

Accepted  
Accepted  
Accepted

Annex ~~in~~ ~~the~~ ~~file~~

No. 2

Dated 27-1-13

From

District Officer Male  
Ele: & Sec: Edu: Deptt Lakki Marwat

To

Mr. Muhammad Hamayun Khan  
Chairman Provincial Inspection Team, Peshawar

Subject: QUESTIONNAIRE

Answers:

No.1. No quota is reserved in any policy of provincial government is available regarding appointment of family members of Army Shaheed.

No.2. Not related to undersigned. It is the job of Executive District Officer, he can give better reply.

No.3. There is no quota reserved for retired employee ward and Class-IV in the recruitment policy. But advocate General has issued vide letter No. 117 DAG Dated 10-02-2009 to "Prepare list of the sons of deceased/retired government officer/official and strictly accommodate them against vacant posts (copy attached). But in this letter retired son means only Class-IV appointment, not in PST.

No.4. In Elementary & Secondary Education Deptt no marks for interview are reserved. According to Govt: of Khyber Pakhtunkhwa, Ele: & Sec: Education Deptt Notification No. SO(PE)4-5/SSRC/Vol-III dated 18-01-2011 rules for recruitment are clarified. In the said notification no marks for interview are allocated.

No.5. Related to the Executive District Officer.

No.6. Advertisement was published in newspapers by the Executive District Officer, he can reply better in this regard.

No.7. Undersigned don't know about that. It relates to the Executive District Officer.

No.8. Copy of prescribed application form is attached.

No.9. Executive District Officer can tell about the total amount collected through application forms.

PST Male:

1. Executive District Officer will answer to this question, because there was a status quo for PST male and the recruitment process was stopped. I neither participate the District Selection Committee meeting nor signed DSC minutes.
2. Piecemeal appointment is forbidden according to the recruitment policy and orders of honorable court (photo copy attached). Undersigned has never signed piecemeal order not co-operated the then EDO in this regard.

PST Female:

1. Sir, undersigned signed only PST female DSC of 39 candidates. The posts were actually vacant and pay of 40 candidates was released by District Accounts Officer Lakki Marwat. District Account Officer Lakki Marwat issued salary of some appointees other than that of DSB recommended appointee on the signature of present Executive District Officer, resultantly some the appointee whose appointment were made on the recommendation of DSB approved appointees remained with out salaries. Out to 39 appointees of DSB six were terminated after verification of their education certificates from concerned BISE Boards and Universities which were found fake and bogus.



2. E.D.O. can answer it better I don't know about that.
3. Miss Bibi Zainab D/o Munawar khan has been appointed as deceased person daughter by EDO so he can tell about her father.
4. These names were not included in DSC list.
5. Miss Qamar Talat was not present in DSC list and the undersigned has not signed the file.
6. E.D.O. will know about her. The undersigned have no knowledge about this appointment order.

CT Male:

1. These four appointment orders were issued by E.D.O. not included in DSC approved list.
2. Undersigned don't know about it. E.D.O. can answer it better.

CT Female:

1. Related to E.D.O.
2. Fareeda Khanam D/O Bahader Sher is working as PST teacher she has been dropped from appointment as CT on her own written request.
3. Nargus Naurin and Rehana Gul have been included in DSC list from merit list and list was signed. It was the duty of E.D.O. to issue their appointment order. Why he did not issued the order, he can reply it better.
4. 6 candidates in open merit and 15 in session wise merit list were included in DSC approved list. Miss Fazilat was not included in list. Hence, E.D.O can tell how she has been appointed.
5. E.D.O. can better tell about it.
6. E.D.O. has granted age relaxation hence, he can reply.

TT Female:

1. Advertisement date was 11-05-2010 not the 11-06-2011. There was status quo actually on the appointment of TT. No DSC meeting was held nor any list was approved but EDO issued order. Undersigned has no knowledge about it.
2. As the orders issued in piecemeal and the name was not included in DSC list. Therefore, EDO can answer.

Lab Assistant:

1. No knowledge about it. Order is issued in piecemeal. Hence EDO is responsible.

DM Male:

1. Order issued in piecemeal. No file no process about the appointment was adopted. Hence EDO can answer.
2. Appointment order of Farmanullah has been issued in piecemeal. The undersigned has not signed. Hence, I have no knowledge about it.

Driver:

1. No, Mr. Sohail Ahmad has not passed SSC.
2. EDO can answer it better.
3. Undersigned has no knowledge about this. E.D.O. can tell what has been done and why it has been done.

Sir, piecemeal order has been issued by E.D.O. and dealing assistants, undersigned has neither signed any order nor co-operate the EDO during any process of such orders. Hence undersigned is not responsible for such like orders.

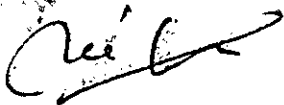


(Muhammad Ayub)

District Officer Male

Ele: & Sec: Education Lakki Marwat

Attested



From

②

District Officer (Male)  
Ele: & Sec: Education Deptt: Lakki Marwat

To

Chairman Provincial Inspection Team/The Inquiry Officer  
Khyber Pakhtunkhwa, Peshawar

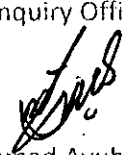
Respected Sir;

I want to take honor to defend my position against the statement of allegations served by Honorable Chief Minister Khyber Pakhtunkhwa on following grounds.

1. As mentioned in the inquiry report of Inquiry officers (Mr. Saleem Khan-Principal GCMHS Tank and Hameedullah Shah ACO D-I-Khan,) the then E.D.O. issued appointment orders of TT (Male), Qari (male), DM (Male), Lab Assistant, Driver and PST male but undersigned did not signed merit list or participated in DSB meeting.
2. Under signed only signed merit of CT (F), CT(M) and PST (F) . Written test and interview of these categories which is prerequisite for formation of merit list, was conducted by Principals/Headmasters and ministerial staff under the directions of the then E.D.O. undersigned was not a member test/interview committee. Tentative and final merit list was prepared and undersigned matched the final merit lists with interview list. There was no discrepancy between interview list and final merit list. At the time of interview original documents was checked by the interview committee. May be some candidates produced fake degrees/certificates during the interview and deceived the interview committee. At the time of signing final merit list the source of undersigned was only interview list not the original degrees/certificates.
3. Undersigned requested the then E.D.O. in black and white to verify the certificates/degrees of candidates eligible for appointment from concerned Board/university, as directed by Secretary to Govt. of Khyber Pakhtunkhwa, E&SE Department Peshawar, to identify fake/tempered certificates/degrees and to take appropriate action against the wrong doers.
4. Undersigned never intentionally signed/approved any illegal quota(s) in violation of merit.

Due to aforesaid reasons undersigned consider that he is not a guilty of irregularity. Moreover during the posting of undersigned as District Officer Male E&SE, undersigned always tried for appointment of teaching and non teaching staff on meritorious grounds. Hence, it is requested that undersigned may not be consider as guilty of irregularities in the appointments made in Feb: 2011 by the then E.D.O.

Note: Undersigned wants to be heard in person by the inquiry Officer/Chairman Provincial Inspection Team.

  
Muhammad Ayub  
District Officer Male  
Ele: & Sec: Education Lakki Marwat

REGISTERED/AD

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Annex - 17



No. SO(S/M)E&SED/4-17/2012/Noor Hassan Ex-DEO Lakki Marwat  
Dated Peshawar the April 23, 2013

To

Mr. Muhammad Ayub,  
Deputy District Education Officer (Male),  
Lakki Marwat.

Subject: - SHOW CAUSE NOTICE

I am directed to refer to the subject noted above and to enclose herewith a copy of the Show Cause Notice wherein the Competent Authority (Chief Minister Khyber Pakhtunkhwa) has tentatively decided to impose the Major Penalty of "Reduction to Lower Post" under Rule-4 of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 in connection with the charge leveled against you.

2. You are therefore directed to furnish your reply to the Show Cause Notice as to why the aforesaid penalty should not be imposed upon you and **also intimate whether you desire to be heard in person.**

3. Your reply should reach to this Department **within Seven (07) days** of the delivery of this letter otherwise ex-parte action shall be taken against you.

Encl: As Above:

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

Endst: of even number & date:

Copy of the above is forwarded to PS to Secretary E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (SCHOOLS/MALE)

Attended

*[Handwritten signature]*

## SHOW CAUSE NOTICE

I, Justice (R) Tariq Pervez Khan, Chief Minister, Khyber Pakhtunkhwa, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Mr. Muhammad Ayub, Deputy District Education Officer (BS-18) (Male) Lakki Marwat as follows:-

- (i) that consequent upon the completion of inquiry conducted against you by the inquiry officer/ inquiry committee for which you were given opportunity of hearing; and
- (ii) on going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defence before the inquiry officer/ inquiry committee,-

2. I am satisfied that you have committed the following acts/omissions specified in Rule-3 of the said rules:

(b) Guilty of Misconduct

3. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of Reduction to a lower post under Rule-4 of the said Rules.

4. You are, thereof, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

6. A copy of the findings of the inquiry officer/ inquiry committee is enclosed.

  
 (JUSTICE (R) TARIQ PERVEZ KHAN)  
 CHIEF MINISTER KHYBER PAKHTUNKHWA  
 COMPETENT AUTHORITY

17.4.2013

Mr. Muhammad Ayub,  
 Deputy District Education Officer (BS-18) (Male),  
 Lakki Marwat.

Attested



To:- The Chief Minister, Khyber Pakhtunkhwa,  
Peshawar.

Through: Section Officer (Schools/Male) Elementary & Secondary Education Department  
Khyber Pakhtunkhwa

Subject: REPLY TO SHOW CAUSE NOTICE

Respected Sir,

With reference to show cause notice dated 17.4.2013, received through Section Officer (Schools/Male) Elementary & Secondary Education Department Khyber Pakhtunkhwa letter No: SO (S)/M/E&SAD/4-17/2012/Noor Hassan Ex DEO Lkki Marwat dated 23.4.2013, received on 13.5.2013.

Reply to show cause notice is submitted as provided in Rule 14 (4) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, as under please:-

1. I have been served as a District Officer (Male) Lakki Marwat whereas Appointing Authority in Education Department was EDO.
2. During the course of personal hearing, I have submitted detailed reply/justification dated 23.01.2013 to the Enquiry Officer on the spot wherein I have clearly shown my innocence as there is no role of District Officer in Appointment cases as provided in Appointment, Promotion & Transfer Rules 1989.
3. I have never signed the merit list of all those staff under report whereas I have only signed the merit list of CT (M), CT (F) & PST (F) on which their appointments have been recommended strictly in accordance with the prescribed rules by DSB as evident from my statement/reply furnished to the Enquiry Officer on 23.01.2013.(Photocopy enclosed).
4. I am ~~not~~ *not owned nor* associated with all the appointment made other then recommendation of DSB and have never signed any merit list nor DSB proceedings.
5. As provided in Rules 14 © of the Khyber Pakhtunkhwa, (E&D) Rules 2011, copy of enquiry report has not been provided to me.
6. I pray for personal hearing as provided in Rule 15 of Khyber Pakhtunkhwa, (E&D) Rules 2011.

Sir, in the absence of above lapses, I would like to place my request for the provision of the above documents/actions as required vide relevant rules of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, therefore, I request your kind honour that the quarter concerned may kindly be asked to do the needful so that I could not be deprived from my fundamental rights.

Sir, I am innocent and have not committed any irregularities during my entire service and bearing clean conduct and prayed that I may very kindly be exonerated from the charges leveled against me.

Thanking you Sir,

Yours Most Obedient Servant.



Muhammad Ayub  
Principal GHSS Tajazai  
District Lakki Marwat.

Dated: 17/05/2013

*Attested*



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

### RECOMMENDATIONS

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

### General Observations

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

Mr. Muhammad Ayub Khan,  
Deputy District Education Officer (BS-17) (Male),  
Lakki Marwat.

Attested  
Cui

2

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

- 2) All the clerical staff working in the EDO offices who have completed their tenure must be transferred to other offices.
- 3) At the time of inviting applications computer printed forms were issued at a cost of rupees twenty (Rs 20/-) per candidate (Annex-AM). Amount collected by the Ex-EDO on account of cost of application has not been deposited in the treasury but unlawfully utilized which may also be recovered.
- 4) In order to discourage production of fake documents the EDO must register cases with local police or Anti Corruption Establishment against those whose appointment orders have been terminated on account of production of fake certificates/degrees or produced fake appointment orders.
- 5) ~~Services of all the persons appointed without advertisement of post, preparation of merit list and approval of DSC may be terminated after serving them with show cause notices.~~

*M. Humayun*  
1-3-13

MUHAMMAD HUMAYUN  
INQUIRY OFFICER.

Mr. Muhammad Humayun  
Deputy District Education Officer (BS-10) (Male)  
Lakki Marwat.

*Attested*  
*Chief*



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the December 26, 2013

**NOTIFICATION**

**NO.SO(S/M)E&SED/4-17/2012/ Noor Hassan & others:** WHEREAS Mr. Muhammad Ayub, Ex-Deputy District Education Officer Male (BS-18) District Lakki Marwat (now Principal GHSS Tajazai District Lakki Marwat) was proceeded against under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. **AND WHEREAS** Mr. Muhammad Humayun, Chairman (BS-21) Provincial Inspection Team, Khyber Pakhtunkhwa Peshawar was appointed as Inquiry Officer to conduct formal inquiry against the accused officer, for the charges leveled against him in accordance with the rules.

3. **AND WHEREAS** the Inquiry Officer after having examined the charges, evidence on record and explanation of the accused officer has submitted the report.

4. **AND WHEREAS** a show cause notice was served upon Mr. Muhammad Ayub, Ex-Deputy District Education Officer Male (BS-18) District Lakki Marwat (now Principal GHSS Tajazai District Lakki Marwat) dated 17-04-2013.

5. **AND WHEREAS** the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after having considered the charges and evidence on record, inquiry report, explanation of the accused officer in response to the Show Cause Notice, personal hearing before the Competent Authority, is of the view that the charges against the accused officer have been proved.

6. **NOW, THEREFORE**, in exercise of the powers conferred under section 14 of Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of "Reduction to a lower post" upon Mr. Muhammad Ayub, Ex-Deputy District Education Officer Male (BS-18) District Lakki Marwat (now Principal GHSS Tajazai District Lakki Marwat).

SECRETARY

**Endst: of Even No. & Date:**

Copy forwarded to the: -

- 1- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- PSO to Chief Minister Khyber Pakhtunkhwa Peshawar.
- 3- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 4- District Education Officer (Male), Lakki Marwat.
- 5- District Accounts Officer, Lakki Marwat.
- 6- Mr. Muhammad Ayub Ex-DDEO Lakki Marwat (now Principal GHSS Tajazai District Lakki Marwat).
- 7- PS to chief Secretary Khyber Pakhtunkhwa Peshawar.
- 8- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 9- PA to Additional Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 10- Office order file.

*Received on  
2/1/2014  
[Signature]*

*[Signature]*

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

*Alleged  
[Signature]*



No. 203

Dated 07-01-2014

From

District Education Officer  
Malo Lakki Marwat


To

The Director,  
E&S Education Deptt: Khyber Pakhtunkhwa, Peshawar

Subject: SUBMISSION OF REVIEW PETITION OF MR. MUHAMMAD AYUB KHAN EX-DDEO (M) LAKKI MARWAT

Memo;

Enclosed please find herewith an application in original in respect of Mr. Muhammad Ayub Khan Principal, GHSS Tajazai, Ex-DDEO (M) Lakki Marwat for further submission to Honorable Chief Minister Khyber Pakhtunwkha please.

  
District Education Officer  
Malo Lakki Marwat

No. 1560 For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered\* addressed to M. A. Khan Date Stamp 07-01-14

Initials of Receiving Office MA Write by "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (In figures) 2000 (in words) Two thousand

Weight 0.5 Kilo Grams

Insurance fee Rs. 0.50

Name and address of sender M. A. Khan

11-1-14

From

Muhammad Ayub Khan  
Principal, GHSS Tajazai,  
Ex-DDEO (M) Lakki Marwat

To

The Honorable Chief Minister  
Khyber Pakhtunkhwa, Peshawar

Through: PROPER CHANNELSubject: REVIEW PETITION TO ABSOLVE THE PENALTY OF REVERSION

Respected Sir;

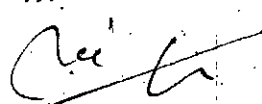
Most respectfully I beg to state that reference notification issued by Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department No. SO(s/m)E&SED/4-17/2012/Noor Hassan and others dated 26-12-2013 the penalty of "Reduction to the lower post" has been imposed on the undersigned by your good self (photo copy attached). I most humbly request your good self to absolve the said penalty, being a "Chief Executive" with following requests /grounds.

1. I have been served as DDEO (Deputy District Education Officer male) Lakki Marwat whereas appointing authority in District level is EDO.
2. The enquiry officer final remarks on final page No. 22 (high light) are "services of all the persons appointed without advertisement, preparation of merit list and approval of DSC (District Selection Committee) may be terminated after serving them show cause notice"

Respected Sir;

I being DDEO signed the DSC of only three categories C.T. (Male), CT (F), and PST (F) for which advertisement have been made, merit list have been prepared and DSC has been arranged. Whereas the EDO have been appointed candidates in nine categories by himself (photo copy of advertisement, merit list, and DSC is attached).

Attested



Hence, it is clear from the enquiry officer remarks that I am innocent and not committed any irregularity, while on the other hand he proposed the penalty of reversion to lower post. Sir it is unjust with me and appeals you to absolve my penalty.

3. The enquiry officer remarks on page No.21 of the inquiry report are (attached and highlighted) "Mr. Muhammad Ayub DDEO appointed his own son against quota reserved for Disable persons"

Sir, the charge to appoint my son in disable quota is also unjust with me. DDEO is not the appointing authority, nor I appointed my son. He has appointed by EDO (order copy attached).

Qualification of my son is B.Sc, CT and B.Ed. He has been applied in Disable quota alongwith disable certificate from M.S. DHQ Lakki Marwat and social welfare department registration certificate. Merit list has been prepared and DSC (District Selection Committee) have prepared and signed the merit list. The EDO has been appointed him as CT in 2 % reserved quota for disable persons, not by undersigned (disable certificate, social welfare department certificate, merit list approved by DSC and documents are attached).

All the record was provided to inquiry officer in personal hearing, but sorry on writing this that:

- 1. He is my son and appointed in disable quota 02 % being on merit.
- 2. I am his father , therefore penalized.

Respected Sir; I request/prayed , as your good-self is the last door for knocking for justice to exonerate me from charges please.

*Muhammad Ayub*  
5/11/2014

Muhammad Ayub  
Principal, GHSS Tajazai  
Ex-DDEO (Male) Lakki Marwat

Attested  
*[Signature]*



MINUTES OF DSB MEETING FOR APPOINTMENT IN ELEMENTARY & SECONDARY EDUCATION DEPT LAKKI MARWAT

The meeting of District Selection Board, for appointment of various categories of teaching staff has been held on 24/02/2011, under the chairmanship of Executive District Officer E&S Education Deptt: Lakki Marwat. The following attended the meeting.

- |   |          |
|---|----------|
| 1. Noor Hassan Khan Executive District Officer E&S Edu:       | Chairman |
| 2. Muhammad Ayub Khan District Officer (M)E&S Education Deptt | Member   |
| 3. Representative District Co-ordination Officer Lakki Marwat | Member   |
| 4. Haroon Badshah Dealing assistant E&S Edu: Deptt            | Member   |

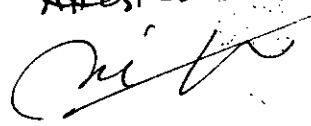
The Committee approved the following candidates to be appointed as PST female BPS-07.

OPEN MERIT

1. Marwarida Bibi D/o Sahib Jan R/o Titter Khel (Court Case)
2. Haseena Latif D/o Latif Ullah R/o Gandhi Khan Khel
3. Shehla Mehmood D/o Mehmood Hashim R/o Tajazai
4. Najma Naureen D/o Muhammad Ullah Khan R/o Pahar Khel Thall
5. Shakila Qayyum D/o Abdul Qayyum R/o Lakki
6. Romana Gul D/o Saif Ur Rehman Shah R/o Marmandi
7. Hussan Pari D/o Nawaz Khan R/o Gandhi Khan Khel
8. Sobia Gul D/o Gul Badshah R/o Lakki City
9. Harneeda Gul D/o Dilawar Khan R/o Gandhi Khan Khel
10. Robina Shahin D/o Falak Naz R/o Lakki City
11. Sumia Rahim Qureshi D/o Abdur Rahim R/o Dara Pezu
12. Shehla Shaheen D/o Mir Zali Khan R/o Mela Shahab Khel (Dalo Khel)
13. Kanwal Urooj D/o Muhammad Ramzan R/o Lakki City
14. Farhat Nisa D/o Watan Khan R/o Lakki City
15. Rukhsana Hayat D/o Hayat Ullah Khan R/o Nar Abu Samand Begu Khel
16. Nighat Sultan D/o Muhammad Bashir R/o Nar Abu Samand Begu Khel
17. Musarat Saheen D/o Muhammad Nazir Khan R/o Serai Naurang
18. Zaheen Begum D/o Nasib Ali Shah R/o Mama Khel
19. Farida Bibi D/o Muhammad Ghulam R/o Abdul Khel
20. Hajara Musarat D/o Muhammad Ibrahim R/o Mashe Mansoor

UNION COUNCIL WISE MERIT

S.No	Name	Father Name	Union Council
1	Nadia Parveen	Altaf Khan	Marmandi Azim
2	Roman Sohrab	Sohrab Khan	Serai Nawrang
3	Zubaida	Gul Nawaz Khan	Baist Khel
4	Qamar Talat	Hameed Ullah	Gandhi Khan Khel
5	Jamshid Bibi	Ghulam Nabi	Lakki
6	Sadia Khan	Kalo Khan	Ghazni Khle
7	Nusrat Shaheen	Awal Khan	Kheru Khel Pacca
8	Najma Irum	Aman Ullah	Abdul Khel
9	Sakcen Gul	Shah Alam Khan	Titter Khel
10	Fehmeeda	Inayat Ullah	Isak Khel
11	Fehmeeda Bibi	Amin Khen	Begu Khel
12	Naureen Niazi	Abdul Ghafar	Dara Tang
13	Gulshan Bibi	Jan Gul	Bakhmal Ahmad Zai
14	Shamim Begum	Ahmad Jan	Behram Khel

Attested  


**DISABLE QUOTA**

S.No	Name	Father name	R/o
1	Shakiba	Ali Khan	Gandi Umar Chiker

**DENIED CANDIDATE OF 1999**

S.No	Name	Father Name	R/o
1	Zaitoon Bibi	Umar Khan	Lakki

**EX- SERVICE MAN/RETIRED DAUGHTER**

S.No	Name	Father Name	Union Council
1	Shahzia Naureen	Muhammad Afzal	Behram Khel
2	Rifat Rani	Feroz Khan	Abdul Khel
3	Shagufta Bibi	Younas Khan	Darra Pezu

*H. A. Badshah*  
 Haroon Badshah  
 Dealing Astt: Local office

*Muhammad Ayub Khan*  
 Muhammad Ayub Khan  
 District Officer male  
 E&S Education Deptt Lakki Marwat

*Representative of District Co-ordination Officer*  
 Representative of District Co-ordination Officer  
 Lakki Marwat

*Executive District Officer*  
 Executive District Officer  
 E&S Education Deptt Lakki Marwat

Attested

*Signature*

**MINUTES OF DSB MEETING FOR APPOINTMENT IN ELEMENTARY & SECONDARY**  
**EDUCATION DEPT LAKKI MARWAT**

The meeting of District Selection Board, for appointment of various categories of teaching staff has been held on 24/02/2011, under the chairmanship of Executive District Officer E&S Education Deptt: Lakki Marwat. The following attended the meeting.

- |  |           |
|--|-----------|
| 1. Noor Hassan Khan Executive District Officer E&S Edu:          | Chairman. |
| 2. Muhammad Ayub Khan District Officer (M)E&S Education Deptt.:  | Member    |
| 3. Representative of District Co-ordination Officer Lakki Marwat | Member    |
| 4. Amanullah Head Clerk E&S Edu: Deptt                           | Member    |

The Committee approved the following candidates to be appointed as CT female BPS-09.

**OPEN MERIT**

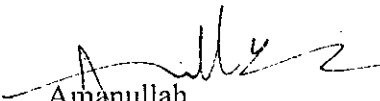
1. Rukhsana Gul D/o Gul Marjan R/o Nawar khel
2. Nasim Akhtar D/o Rasool Khan R/o Isak khel
3. Hameeda Babo D/o Zain Ud Din Jabu khel
4. Maimoona Rehman PST, D/o Gul Rehman Muslim Abad Lakki City
5. Rizwana Gul D/o Muhammad Qasim Muslim Abad Lakki city
6. Shabnum Bibi D/o Izat Khan R/o Michen khel

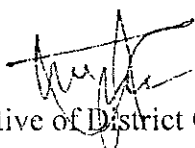
**SESSION WISE MERIT**


1. Rehana Shaheen D/o Zulfiqar Ahmad R/o Lakki Mina khel
2. Rizwana Kokab (PST, D-I-Khan) D/o Abdul Hadi Khan R/o Sarga Kheru khel
3. Hameed Bibi PST D/o Ibrahim Khalil R/o Titter khel
4. Adila Tariq PST, D/o Muhammad Tariq R/o Toti Abad Lakki
5. Nargus Yasmin D/o Juma Khan R/o Toti Abad Lakki
6. Razia Begum D/o Karim Khan R/o Nawar khel
7. Nazia Gul TT, D/o Syed Mumtaz Ali Shah R/o Mina Khel Lakki
8. Bibi Ruqia PST, D/o Nabiullah Jan R/o Michen khel Lakki
9. Kalsoom Bibi D/o Habib Ur Rehman R/o Gulbaz Dehqan
10. Saima Malik Nazir D/o Momin Khan R/o Titter khel
11. Akhtar Bibi PST, D/o Alam Dad Khan R/o Tajazai
12. Khurshid Talat PST, D/o Juma Khan R/o Nasir Khel
13. Nargus Noreen D/o Khan Badshah R/o Saeed khel Lakki
14. Faiqa Bashir D/o Bashir Hussain (Retired employee son/daughter quota vide High Court Bench D-I-Khan, Deputy Advocate General No. 117 Dated 10-02-2009)
15. Samrin Bibi D/o Muhammad Nawaz (Retired employee son/daughter quota vide High Court Bench D-I-Khan, Deputy Advocate General No. 117 Dated 10-02-2009)

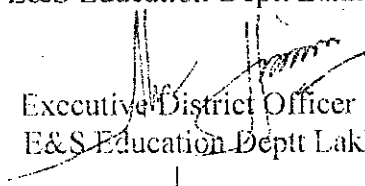
**Disable Quota**

Rehana Bibi D/o Muhammad Qasim

  
Amanullah  
H/C Local office

  
Representative of District Co-ordination Officer  
Lakki Marwat

  
Muhammad Ayub Khan  
District Officer male  
E&S Education Deptt Lakki Marwat

  
Executive District Officer  
E&S Education Deptt Lakki Marwat

*Alotted*  



Minutes of DSB meeting for appointment in Elementary & Secondary Education Deptt: Lakki Marwat

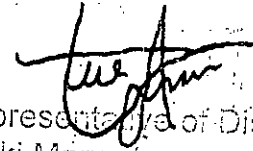
The meeting of District Selection Board for appointment of various categories of teaching staff has been held on 21-11-2010, under the Chairmanship of Executive District Officer E&S Education Department Lakki Marwat. The following are the participants of meeting.

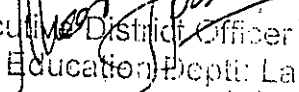
1. Noor Hassan Khan Executive District Officer E&S Lakki Marwat Chairman
2. Muhammad Ayub Khan District Officer Male E&S Lakki Marwat Member
3. Representative of District Co-ordination Officer Lakki Marwat Member

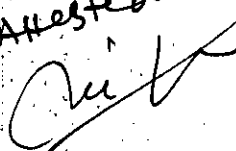
The committee approved the below named candidate for appointment as CT male BPS-09 against the 2 % disable quota.

Gohar Rehman S/o Muhammad Ayub Resident of Hakim Topa, Lakki Marwath having qualification of B.Sc and CT.

  
Muhammad Ayub Khan  
District Officer Male  
E&S Education Deptt: Lakki Marwat

  
Representative of District Co-ordination Officer  
Lakki Marwat

  
Executive District Officer  
E&S Education Deptt: Lakki Marwat

Attested  




OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELE: & SEC: Edu: Deptt LAKKI MARWAT

Merit list of Disable candidates for CT (MALE) interviewed on 15-6-2010

S No	R.No	Name	Father Name	D.OB	SSC			FA			BA			MA			CT			Session	Exp	T. Score
					Obt:	Total	Score	Obt:	Total	Score	Obt:	Total	Score	Obt:	Total	Score	Obt:	Total	Score			
2	341	Gohar Rehman	Muhammad Ayub Khab	1/4/1988	543	850	15.971	594	1100	13.5		550	0				603	900	16.75	2010	5	51.22059
3	143	Abdul Jalil	Muhammad Qadar Khan	1/2/1978	373	850	10.971	579	1100	13.159	256	550	4.6545	530	1100	4.818	541	900	15.028	2005		48.63018

District Officer  
Ele: & Sec: Education Deptt  
Lakki Marwat

Representative of DCO  
Lakki Marwat

Executive District Officer  
Ele: & Sec: Education Deptt  
Lakki Marwat

Attested

APPOINTMENT ORDER

Consequent upon the recommendations of District Selection Committee, the appointment of below named candidate is hereby ordered as CT (m) in BPS-09 (3820-230-10720) plus usual allowances as admissible under the rules on regular basis against 2% Quota reserved for Disable persons, under provision of Establishment & Administration Department circular bearing No. SOR-6(E&AD)13-01/2005 dated 10-08-2005 on the terms & conditions given below in the interest of public service from the date of taking over charge.

<i>S No</i>	<i>Name</i>	<i>Father name &amp; address</i>	<i>To be posted at</i>	<i>Remarks</i>
1	Gohar Rehman	Muhammad Ayub R/o Hakim Topa	GMS Samandi	Against vacant post being disable

TERMS & CONDITIONS:

1. His appointment will be considered without pension and gratuity in terms of section 19 of NWFP Civil Servant Act 1973, as amended vide NWFP Civil Servant (Amendment) Act, 2005. He will however be entitled to contributory provident fund in such a manner and such a rate as may be prescribed by Govt:
2. In case of resignation without notice two months pay/allowance will be refunded to Govt.
3. His services will be governed by such a rules and regulations as may be issued by Govt time to time.
4. In case of misconduct he will proceeded against the civil servant removal from service (special power) ordinance, 2000 and rules frame from time to time.
5. Charge reports should be submitted to all concerned
6. No TA/DA is allowed
7. The undersigned will check and verify the certificates/degree of above candidate from concerned Board/Universities before the drawl of pay.
8. The appointment order is liable to termination, if the candidate failed to take over charge with in 15 days of commencement date:
9. The undersigned reserve the rights of amendment in case of any mistake.
10. He is required to produce health and age certificate from medical superintendent DHQ hospital Lakki Marwat

**(Noor Hassan Khan)**  
Executive District Officer  
Ele: & Sec: Education Deptt  
Lakki Marwat

Endst No. 11874-78  
Copy to the

Dated 23/11/2010

1. Director Ele: & Sec: Education Deptt Khyber Pukhtunkhwa, Peshawar
2. District Co-ordination Officer Lakki Marwat
3. District Officer male local office
4. District Accounts officer Lakki Marwat
5. Headmaster school concerned
6. Candidate concerned

Executive District Officer  
Ele: & Sec: Education Deptt  
Lakki Marwat

Attested

*One*

OFFICE OF THE DISTRICT OFFICER SOCIAL WELFARE AND WOMEN DEVELOPMENTAL  
DEPARTMENT LAKKI MARWAT.

Dated 04-02-2010

Reg: No. 930-10

PCRD/KPK/LM

DISABILITY CERTIFICATE.

ASSESSMENT BOARD FOR THE DISABALED PERSON

- |   |  |                          |                            |
|---|--|--------------------------|----------------------------|
| 1- Name   | Gohar Rehman                               | 2- Father Name.          | Muhammed Ayub              |
| 3- Married/Unmarried                                    | MARRIED                                    | 4- Spouse                | Nahida Biloi               |
| 5- Date of Birth.                                       | 01-04-1988                                 | 6- N.I.C                 | 11201-8696365-5            |
| 7- Qualification.                                       | F. Se.                                     | 8- Nature of disability. | Right Ear is deaf by Birth |
| 9- Present Address.                                     | vill: Habim Tope Teh: & Dist: Lakki Marwat |                          |                            |
| 10- Permanent Address.                                  | -do-                                       |                          |                            |
| 11- Recommendation of the board Disability Certificate. |  |                          |                            |

*Qullat*  
District Officer,  
Social Welfare & Women Development  
Department Lakki Marwat.  
**DISTRICT OFFICER**

Community Development Department  
Social Welfare Dept: Lakki Marwat

*Attested*  
*Qullat*



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
(PROVINCIAL COUNCIL FOR THE REHABILITATION OF DISABLED PERSONS)**

**APPLICATION FOR DISABILITY CERTIFICATES**

Name: Gohar Rehman Father's Name: Muhammad Anub  
 Married/Unmarried: Married Spouse: ~~Asma~~ Nohida  
 IC No: 11201-8696365-5 Date of Birth: 01-04-1988  
 Qualification: F.Sc. Type of Disability (Physical/Visually/Hearing/Mentally):  Hearing  
 Nature of Disability: Right Ear is Deaf Cause of Disability: By Birth  
 Type of job can do: Teaching Source of Income: Nil  
 Applied for: Disability Certificate Phone No: 0245-9851862  
 Present Address: Village Hahim Tapa Tehsil and District  
Mohi Marwat  
 Permanent Address: do-

*Gohar Rehman*  
Signature of the Applicant

**RECOMMENDATION OF THE ASSESSMENT BOARD**

Applicant is declared: \_\_\_\_\_  
 Disabled/Net Disabled: \_\_\_\_\_ Disability/Impairment: Auditory  
 Fit to work/.net fit to work: \_\_\_\_\_ Type of job advised (Optional): paraent  
 Referred to: \_\_\_\_\_ Recommendations of the Board

- i. \_\_\_\_\_
- ii. \_\_\_\_\_

*Attested*  
*Qureshi*

*Arumad*  
Chairman

**Medical Assessment Board**  
MEDICAL SUPERINTENDING  
D.H.Q Hospital Lakki Marwat

*Qureshi*  
Member  
PRINCIPAL  
Govt. Technical Vocational  
Training Center Ghazni Khel  
Lakki Marwat.

Member

Member

*Qureshi*  
Member  
26/11/2010  
Senior Medical Officer  
D.H.Q Hospital Lakki Marwat.

*Qureshi*  
**DISTRICT OFFICER**  
Community Development Department  
Social Welfare Deptt: Lakki Marwat

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD



GOHAR REHMAN

Roll No. AB624281

Address MUHAMMAD AYUB KHAN  
C/O MUNTAZ BOOK DEPOT MICHAN  
KHEL ADDA

Registration No. OENLM00428

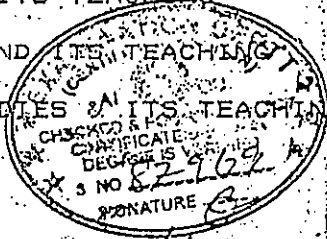
Final Semester SPR-2009

Tehsil LAKKI MARWAT  
District LAKKI MARWAT

has successfully completed CERTIFICATE OF TEACHING

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT-08	0638	TEACHING STRATEGIES & EVALUATION	100	67
AUT-08	0633	SCHOOL ORGANIZATION	100	65
AUT-08	0632	EDUCATIONAL PSYCHOLOGY	100	62
AUT-08	0631	DIMENSIONS IN EDUCATION	100	60
SPR-09	0634	ENGLISH AND ITS TEACHING	100	61
SPR-09	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	74
SPR-09	0607	SCIENCE & ITS TEACHING	100	64
SPR-09	0635	ISLAMIAT AND ITS TEACHING	100	62
SPR-09	0605	SOCIAL STUDIES & ITS TEACHING	100	68



Deputy Controller  
Allama Iqbal Open University  
Islamabad

*Attested*  
*[Signature]*

DISTRICT OFFICER  
(E.S.) Edu. Larki Marwat

CREDITS: 5

Total Marks / Obtained 900 / 603

Result Declared on MARCH 30, 2010

Percentage / Grade 67 B

Date of issue APRIL 05, 2010

*[Signature]*

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right of privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

*Attested*  
*[Signature]*

S.No: 20129463 09585

# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION, BANNU

## DETAILED MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION



Session 2004 ANNUAL (Part-II)

Name: Gohar Rehman

Father's Name: Muhammad Ayub Khan

Roll No: 29463

Subject	Marks	MARKS OBTAINED			In Words	
		Theory/Paper-A	Pract/Paper-B	Total		
1. English-I	75	67		67	Sixty-Seven	
2. English-II	75	40		40	Forty Only	
3. Urdu-I	75	49		49	Forty-Nine	
4. Urdu-II	75	46		46	Forty-Six	
5. Islamiyat (Comp)	75	39		39	Thirty-Nine	
6. Pakistan Studies	75	53		53	Fifty-Three	
7. Mathematics	100	52		52	Fifty-Two	
8. Chemistry	100	42	23	65	Sixty-Five	
9. Biology	100	35	23	58	Fifty-Eight	
10. Physics	100	53	21	74	Seventy-Four	
Total				850	543-B	Five Hundred Forty-Three Only

Controller of Examinations  
Board of Intermediate and  
Secondary Education Bannu

Prepared by: [Signature] Compiled by: [Signature]

Checked by: [Signature]

Date: 19-06-2004

Note: Errors / Omissions are excepted.

Khaksar and BRANS Software-Enterprise (KBSoft)  
Compiled by (HNR) Computer CELL BISE, Bannu

Total 850

Remarks: SC

Controller of Examinations  
Board of Intermediate & Secondary Education  
BANNU

Attested  
[Signature]

Attested  
[Signature]  
DISTRICT OFFICER  
(E&S) Edu: Lakki Mahwat

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION,  
BANNU N-W.F.P. PAKISTAN** S.No 10187

**Higher Secondary School Certificate Examination**

36

Session: 2006 (Annual Part-II)



Roll No: 23636  
Group: Pre-Engineering

Registration No: 021-B-BCEGCL-H-04

Certificate No: 20623636

This is to certify that Gohar Rehman  
Daughter of Muhammad Ayub Khan  
and a student of The Educators College Lakki Gramar Campus, Lakki Marwat

has secured the marks shown against each subject, in the Higher Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu, held in May, 2006 as Regular Candidate

**CHECKED OVER**

Subject	Marks	MARKS OBTAINED						In Words
		Part-I		Part-II		Total		
		Theory	Practical	Theory	Practical			
1. English	200	54	-	30	-	84	Eighty-Four	
2. Urdu	200	70	-	61	-	131	One Hundred Thirty-One	
3. Islamic Education	50	41	-	-	-	41	Forty One	
4. Pakistan Studies	50	-	-	32	-	32	Thirty Two	
5. Mathematics	200	58	-	38	-	96	Ninety Six	
6. Physics	200	38	22	37	8	105	One Hundred Five	
7. Chemistry	200	30	20	42	13	105	One Hundred Five	

Total: 1100      594-C      Five Hundred Ninety-Four Only

Remarks

Date of declaration of Result: 05-08-2006  
Prepared by: [Signature]  
Checked by: [Signature]  
Date of issue: 05-08-2006

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**DISTRICT OFFICER**  
(E&S) Edu. Lakki Marwat  
**Controller of Examinations**  
Board of Intermediate and  
Secondary Education, Bannu.

(Compiled by Computer CELL BISE, Bannu)

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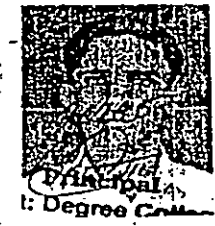
Errors/Omission excepted

Serial No. 03 947

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Science & Technology Bannu

Khyber Pakhtunkhwa  
P.A.F.P. Pakistan



## Provisional Certificate

Session 2006-2008

This is to certify that Mr./Miss. Gohar Rahman S/D of Muhammad Ayub  
a Student of Govt. Degree College Isak Khel Lakki Marwat  
has passed Bachelor of Science Examination  
held in June, 2011. He/She was placed in 2nd Division/Grade/OPD securing 300 marks out of 550

The Examination was taken as a whole / in parts In Parts

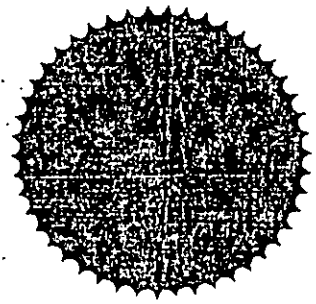
Roll No. 1147

Reg. No. 2006-UB-GCL-2628

Issue Date 23-01-2012

Prepared by: [Signature]

Checked by: [Signature]



UST BANNU

[Signature]  
Controller of Examinations

[Signature]

[Signature]

DISTRICT OFFICER  
(ESS) Edu: Lakki Marwat

Akeshal  
[Signature]

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## وکالت نامہ

کوٹ فیس		قیمتی ایک روپیہ
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بعد ازاں خیر پختہ خوا، سروس ٹریڈینگز، پنج ماہ، پشاور۔

محمد ایوب خان <sup>مخانب</sup> وزیر اعلیٰ نذر سکریٹری PPK پشاور <sup>پیشینتر</sup>

دعویٰ یا جرم

سروس اپیل

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہات کے پیش یا تصفیہ مقدمہ <sup>محمد ایوب خان</sup> <sup>مخانب</sup> وزیر اعلیٰ نذر سکریٹری PPK پشاور <sup>پیشینتر</sup> کیلئے  
محمد طارق قریشی ایڈووکیٹ ہائی کورٹ، لکی مروت۔

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت ہمارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا چھپے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا چھپے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا معیت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پر داخستہ صاحب موصوف حمل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسلئے ڈگری نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر غائبی یا راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از پکھری صدر بیرونی مقدمہ مزکور نظر ثانی اپیل گمرانی و ہر قسم مقدمہ مزکورہ یا مشورتی ڈگری یک طرفہ یا درخواست حکم اتناہی یا قرقرہ یا گرفتاری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا نگلی علیحدہ مختصر دی کا اختیار ہوگا اور تمام ساختہ پر داخستہ صاحب موصوف حمل کردہ از خود منظور قبول ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل گمرانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا پریزبر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جہان التواہ پرے گا وہ صاحب موصوف کا حق ہوگا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

2014

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

مارچ

ناہ

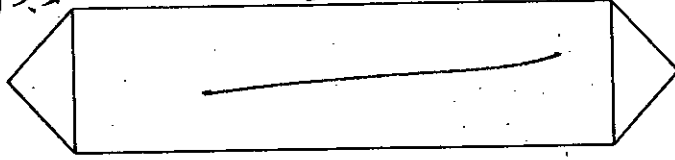
22

مورخہ

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

محمد ایوب خان - پیشینتر

بعدالت ضیبر خٹوا خواہ سروس ٹریبونل لہشاور



اپیلنسٹ

2014ء پنجاب

25 اگست

مورخہ

بنام

قہر ایوب خان

مقدمہ

سروس اپیل دہ 2014

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

قہر طارق فریشی ایڈووکیٹ  
سکھ روٹ

آن مقام لہشاور کیلئے سید رشید خان دروست ایڈووکیٹ لہشاور  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا مکمل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت 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۔ از بصورت ضرورت مقدمہ مذکور 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 بھی وہی جملہ مذکورہ با اختیار 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 وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted  
Chai

قہر ایوب خان  
(اپیلنسٹ)

2014ء 25 اگست 25

العہد گ د گ العہد  
مقام لہشاور کے لئے منظور ہے۔

عدنان سٹیشنری مارٹ  
چوک مشٹری لہشاور ٹی ٹون 2220193  
Mob: 0345-9223239

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