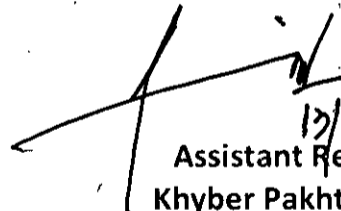


Cost of Rs. 2000/- received in Service Appeal No. 990/2023

Titled Farzana Sardar VS EGYSE

in the office of Assistant Registrar, Vide Order 19-02-2024

submitted on 13/03/2024.


13/03/24
Assistant Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL # 990/2023

Mst. Farzana Sardar, DEOAppellant.

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents.

INDEX

S#	Description of Documents	Annex	Pages
1.	Affidavit	A	1
2.	Authority Letter	B	2
3.	Parawise Comments	C	3-7
4.	Annexures	D	8-33


Deponent

*Met date
20/3/24
S.B. - Peshawar*

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 990/2023

Mst. Farzana Sardar, DEO..... Appellant

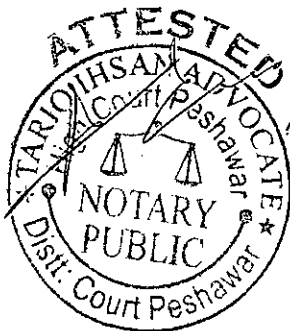
VERSUS

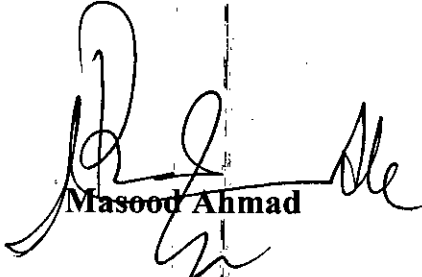
Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, **Masood Ahmad**, Secretary, Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off.




Masood Ahmad
Secretary
E&SE Department Peshawar



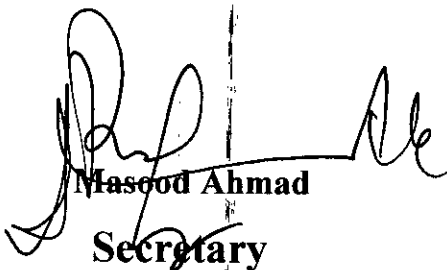
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY LETTER

It is certified that **Mr. Amjid Ali, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar **Service Appeal# 990/2023 Case Titled Mst. Farzan Sardar, DEO vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.**


Masood Ahmad
Secretary

E&SE Department Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 990/2023

Mst. Farzana Sardar.....

Appellant
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 11741

Dated 13/3/24

Secretary E&SE, Govt: of Khyber Pakhtunkhwa & others..... Respondents.

PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS NO 01, 02 & 03

Respectfully Sheweth

Preliminary Objections

1. That the appellant has not come to the Honorable Tribunal with clean hands. The malpractice has been proved against the appellant, after following legal proceedings and thereafter she was awarded a major penalty of reduction to a lower post for a period of three years.
2. That the appellant is not an aggrieved person nor has any locus standi to file the present appeal as she has been dealt in accordance with law therefore, the present appeal is liable to be dismissed in limine.
3. That the appellant is estopped by his own conduct to file the present appeal.
4. That the appellant has concealed material facts from this Honorable Tribunal, therefore, is not entitled to any relief.
5. That the present appeal is against the prevailing law and rules.
6. That the appellant is a guilty person in the eyes of law and is not entitled for any relaxation or any relief she has sought from this Honorable Tribunal.
7. That the present appeal is liable to be dismissed being devoid of any merits.
8. That the present appeal is hopeless time barred, hence liable to be dismissed.
9. That the present appeal is just filed by the appellant to pressurize the respondents for getting illegal unlawful benefits.
10. That the appellant is just wasting the precious time of this Honorable Tribunal through the instant frivolous appeal.
11. That the present appeal is liable to be dismissed with heavy compensatory cost.

REPLY ON FACTS

1. That Para-01 pertains to service record of the appellant.
2. That Para-02 also pertains to service record of the appellant.
3. Incorrect and misleading. The alleged documents were prepared after an action was taken against the appellant and others by the competent authority. The appellant is involved in malpractice like fake appointments and posting transfer orders without the due course of law.
4. Incorrect, hence denied. The guilt of the appellant has been proved after following due course of law and procedure.
5. Incorrect, all the charges against appellant is based on truth, and the appellant was served with the charge sheet and statement of allegations, wherein all the charges were mentioned and the appellant reproduced the same.
6. Incorrect hence denied. The appellant has never proved herself innocent at any stage of the departmental proceedings and failed to defend herself.
7. Incorrect and denied in toto. The findings and recommendations of inquiry committee are totally against the appellant and guilt is proved against her.
8. Incorrect, hence denied. The inquiry committee not only proved the guilt of the appellant and brought all the illegalities on the file of inquiry but also confronted the appellant with them, but the appellant failed to justify her acts and omissions. The appellant transferred 19 PST, SPST and PSHTCF) in utter violation of the transfer policy notified on 11-09-2019 She has also transferred 04 CT, DM and TT Teachers furthermore, an illegal appointment of Mst. Sumbal has also been made as Laboratory Assistant against deceased son quota vide Endstt#92/G dated 06-10-2020. Neither any one in her parents is Government Employee nor any one among her parents died during service. The appellant being Ex-DEO (F) Mardan is directly responsible for abetment and negligence in the case of fake appointments. **(Copies are attached as Annex 01 to 10 respectively)**
9. Incorrect and denied. As explained above many irregularities and negligence have been proved on the part of the appellant. The charges 1,2,3,4&7 are against the appellant and are the conclusive proof of her guilt, therefore she is not entitled to any relief what so ever claimed by her through the instant appeal.

10. Para-10 is incorrect, hence denied. The appellant has been given free and fair chance of hearing and defense at the time of departmental inquiry proceedings.
11. Incorrect, hence denied. The appellant is misleading this Honorable Tribunal by false statements and is trying to convince this Honorable Tribunal through oral arguments instead of reliable justification of her guilt as is proved against her.
12. Incorrect and denied. The inquiry proceedings is in accordance with law and based on justice. The appellant is just repeating the facts again and again in subsequent para's of the appeal but indeed the guilt of appellant is tangible and duly proved against her.
13. Para-13 is incorrect and the inquiry report regarding 26 PSTs, TTs, ATs and CTs is comprehensive and conclusive proof against the appellant.
14. Para-14 is incorrect hence denied. The appellant has intentionally issued fake appointment order duly signed by her which shows malpractice on the part of the appellant. All the acts and omissions done by the appellant is with an evil mind and bad intention in order to gain illegal benefits.
15. Incorrect hence denied. The proceedings against the appellant is in accordance with law and the appellant has been given every chance of defense to which she badly failed to justify herself.
16. The appellant is guilty of misconduct and her departmental appeal as well as the instant appeal are baseless and liable to be dismissed.
17. Para-17 alongwith all grounds of appeal are totally incorrect hence denied.


Reply on Grounds

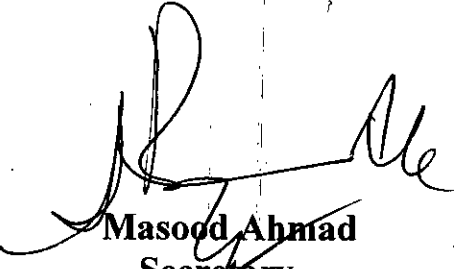
- A. Pertains to record in light of the current situation and misconduct.
- B. Incorrect, the findings of the inquiry committee are based on merits, justice and real facts.
- C. Incorrect, hence denied. The appellant has been proceeded against as per law and justice.
- D. Incorrect, there is no violation of Article-04 & 10 A of the Constitution and the findings of the inquiry committee are based on real facts and justice.

- E. Incorrect, the inquiry committee exhibited and confronted the appellant with each and every document but she failed to explain and justify herself towards the illegal acts and omissions done by the appellant.
- F. Para-F is incorrect and is a false story just to mislead this Honorable Tribunal. The charge against the appellant amounts to misconduct by the appellant and therefore has been treated in accordance with law and awarded with major penalty of "reduction to lower post for a period of three years"
- G. Para-G is incorrect and denied in toto. The guilt of the accused is proved and all the illegal Acts and omissions of the appellant are also transparent from the record of the appeal.
- H. Incorrect and denied. The findings of inquiry committee alongwith notification dated 24-11-2022 is in accordance with law!
- I. Incorrect and denied. Proper and just inquiry has been proceeded against the appellant.
- J. Incorrect and denied. Proper and fair opportunity has been given to the appellant during the course of department inquiry proceedings and nothing is illegal in the inquiry proceeding.
- K. Incorrect, the prescribed procedure has been followed by the inquiry committee.
- L. Incorrect, hence denied. The inquiry proceedings are in accordance with law and prescribed procedure.
- M. Incorrect, hence denied. The appellant is misleading. She has been personally heard and given every opportunity of her defense.
- N. Incorrect hence denied. The competent authority have followed every legal step to achieve the ends of justice.
- O. Incorrect hence denied. Detail reply has been given above. There is no violation of the Constitution of Pakistan.
- P. Incorrect, the appellant has been given opportunity of personal hearings.
- Q. Incorrect hence denied. The appellant is not an innocent person and has been proved guilty of misconduct.

- R. Incorrect and denied. The appellant has never been deprived from any legal right indeed the appellant is guilty of misconduct and has been awarded with major penalty.
- S. That the respondent will raise further points at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly requested that the appeal in hand may kindly be dismissed with heavy cost in favor of the respondent.


Samina Altaf
Director
E&SE Department
(Respondents No. 03)


Masood Ahmad
Secretary
E&SE Department
(Respondents No.01 & 02)

از طرف مسماة فرزانہ سردار (MC BS-19)
ڈسٹرکٹ ایجوکیشن آفیسر زنانہ ڈیرہ اسماعیل خان
جواب بابت شوکا ز نوٹس

Letter No. SO(IQ) E & GED/1-1/2022, Inquiry against
Mardan Dated Feshawar 26/04/2022

جناب عالی!

عرض خدمت ہے کہ سالہ... نے بطور ڈسٹرکٹ ایجوکیشن آفیسر زنانہ سردار، ایف اے ایف اے (2020-2021) میں...
 06-11-2020 تک ٹوٹل 50 مہینے سروس کی تھی اس دوران میں ڈسٹرکٹ ایجوکیشن آفس میں تروت جہاں نامی ایک لڑکی کا بطور...
 اسٹیٹ بگس آرڈر جاری ہوا جس کو میں نے... علاقہ... کی... سے... کو باخبر کیا اور... گیا کہ مردان ایک...
 آفس میں 2 نمبر ٹرانسفر اقرری آرڈر ہو رہے ہیں اور اس کے ساتھ ہی میں نے میڈیا کے ایک چینل 92 نیوز میں اپنے اس بابت...
 انٹرویو میں اس بابت... طرح واضح کیا کہ اس پر فوری کارروائی اور انکو آئی ایچ کیو کیشن اور اسٹیبلشمنٹ... کی جانب سے...
 میرے اوپر میرے مردان میں مردان سروس ٹیریڈ میں ٹرانسفر کرنے کا الزام عائد کیا گیا ہے عرض خدمت ہے کہ...
 نے مردان ڈسٹرکٹ میں ٹرانسفر ہو کر بطور ڈسٹرکٹ ایجوکیشن آفیسر زنانہ ایف اے ایف اے ایف اے کیشن دفتر زنانہ سردار میں...
 جو دیگر لہکاروں میں سے کسی نے بھی نہیں کیا کہ... تبادلوں پر کسی قسم کی پابندی کا آرڈر ایگزسٹ نہیں ہے۔ اس لئے کہ میرے اس...
 دوران ڈائریکٹریٹ اور مگر ٹریڈ سے کسی قسم کے تبادلے... تھے اور میرے دفتر میں جب بھی کسی قسم کے تبادلے...
 موجود تمام لٹریچر مشاورت سے اور باقاعدہ آفس کارروائی کی صورت میں کئے جاتے تھے۔ باقی جب میری اس انکو آئی ایف اے بابت...
 ہوگی تو میں اپنے مردان میں موجود دہریہ کا تمام ریکارڈ موجود برقرار رکھتا ہوں۔

(Signature)
 Family Dera Ismail Khan

میرا جواب بمذ شوکا ز نوٹس کی فوٹو کاپی کے ہمراہ ارسال خدمت ہے۔

فرزانہ سردار MC BS-19

ایف اے ایف اے ڈسٹرکٹ ایجوکیشن آفیسر

موجودہ ڈسٹرکٹ ایجوکیشن آفیسر

ڈیرہ اسماعیل خان

08-05-2022

Attested
Soig
 Secretary (Inquiries)
 Elementary & Secondary Dept
 Govt of Khyber Pakhtunkhwa
BS (Acting)
So (MC)
BS (Acting)
 13/5

207

11 5

از عرف مسماة فرزانہ سردار (MC BS-19)
ڈسٹرکٹ ایجوکیشن آفیسر زنانہ ڈیرہ اسماعیل خان

جواب بابت شوکاژ نوٹس

Letter No. SO(IQ) E. & SED/1-1/2022/Inquiry against
DEO(F) Mardan Dated: Peshawar 26/04/2022

جناب عالی!

عرض خدمت ہے کہ سائل نے بطور ڈسٹرکٹ ایجوکیشن آفیسر زنانہ مردان میں از مورخہ 13-04-2020 سے 06-11-2020 تک نوٹس 05 سینے سروں کی تھی اور مردان میں ڈسٹرکٹ ایجوکیشن آفس میں شرکت جہاں نامی آئیڈیلز کی کا بطور ایب اسٹینٹ لوگس آرڈر جاری ہوا جس کو میں نے معائنہ حلفہ کے تحت دیکھا اور اس کے ساتھ ہی میں نے میڈیا کے ایک چینل 92 نیوز میں اپنے اس بابت ایک آفس میں 2 نمبر ٹرانسفر اقراری آرڈر ہو رہے ہیں اور اس کے ساتھ ہی میں نے میڈیا کے ایک چینل 92 نیوز میں اپنے اس بابت ایک انٹرویو میں اس بابت اچھی طرح واضح کیا کہ اس پر فوری کارروائی اور انکوائری ایجوکیشن آفیسر کے حکام کی جانب سے انتہائی ضروری ہے۔ میرے اوپر میرے مردان میں دوران مردان پشاور کے ٹرانسفر کے ذریعہ لایا گیا ہے۔ عذر خدمت ہے کہ جب میں نے مردان ڈسٹرکٹ میں ٹرانسفر ہو کر بطور ایب اسٹینٹ ایجوکیشن آفیسر زنانہ کا چارج لیا تو ایب اسٹینٹ ایجوکیشن آفیسر زنانہ مردان میں دفتر میں موجود تمام سینئر جو تیز رفتاروں میں سے کسی نے بھی یہ نہیں کہا کہ تبادلوں پر کسی قسم کی پابندی کا آرڈر ایب اسٹینٹ ایجوکیشن آفیسر زنانہ مردان میں موجود تمام سینئر دوران ڈائریکٹریٹ اور سیکریٹریٹ سے کئی قسم کے تبادلے ہوئے تھے اور میرے دفتر میں جب بھی کسی قسم کے تبادلے ہوئے تھے تو دفتر میں موجود تمام عملے کی مشاورت سے اور باقاعدہ آفیسر کا روالہ کی صورت میں کئے جاتے تھے۔ باقی ادب میری اس انکوائری کی بابت پرسنل ہیئرنگ ہوگی تو میں اپنی مردان میں موجود ہیریز کا تمام ریکارڈ موجودہ پشاور ڈسٹرکٹ میں رکھوں گی۔

(Handwritten signature)

میرا جواب بابت شوکاژ نوٹس کی نوٹ کاپی کے ہمراہ ارسال خدمت ہے۔

نوٹ:

مجھے اس شوکاژ نوٹس کی بنیاد پر Personal Hearing کا موقع دیا جائے تاکہ میرے پاس جو ثبوت موجود ہیں ان کو موقع پر آپ کے سامنے واضح کر سکوں اور اس بات کا ثبوت دے سکوں کہ جو انکوائری ہوئی تھی وہ 3 سال کے ریکارڈ کی ہوئی تھی اور میرا ایجوکیشن آفس مردان ڈسٹرکٹ میں سروں کا دورانیہ صرف اور صرف 5 مہینے کا تھا اور نہ ہی یہ بیان صرف اور صرف سچ پوچھی ہے۔

MC BS-19

فرزانہ سردار
 سابقہ ڈسٹرکٹ ایجوکیشن آفیسر مردان
 موجودہ ڈسٹرکٹ ایجوکیشن آفیسر زنانہ

ڈیرہ اسماعیل خان

08-05-2022

(Official stamps and signatures)
 Section Officer (Inquiries)
 Elementary & Secondary Edu. Deptt.
 Govt. of Punjab
 Peshawar

(Handwritten notes)
 24/5



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No. SO(Inq)E&SED/1-1/2022/Inquiry against DEO (F) Mardan and Others
Dated Peshawar the July 6th, 2023

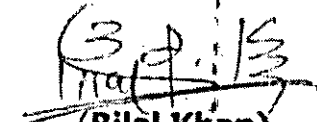
To

1. Mst. Farzana Sardar,
Ex-DEO (F), Mardan,
Now DEO (F) Lakki Marwat.
2. Mr. Sartaj Khan,
Ex-Senior Clerk, office of DEO (F), Mardan.
3. Muhammad Nisar,
Senior Clerk, GGHS Kooper Mardan.

ECM
6.7.23

Subject: - **REVIEW PETITIONS AGAINST THE NOTIFICATION DATED 24-11-2022.**

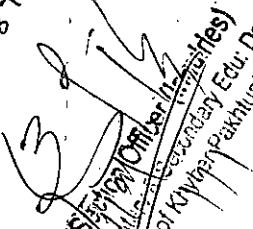
I am directed to refer to your review appeal on the subject cited above and to state that the Appellate Authority/Chief Minister Khyber Pakhtunkhwa has rejected your review appeal having no valid grounds.

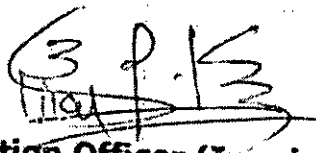

(Bilal Khan)
Section Officer (Inquiries)

Endst: Even No. & Date:

Copy of the above is forwarded to the: -

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Female) Mardan.
3. Section Officer (MC) E&SE Department for further necessary action please.
4. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.

Attested

Section Officer (Inquiries)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa


Section Officer (Inquiries)

Through: Proper channel.

Subject: APPEAL/ REVIEW AGAINST NOTIFICATION NO. SO (INQ) ESSED/1-1/2022/INQUIRY/DEO (F) MARDAN DATED: 24-11-2022, ISSUED BY WORTHY SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT, VIDE WHICH MAJOR PENALTY OF "REDUCTION TO A LOWER POST FOR A PERIOD OF THREE YEARS" HAS BEEN IMPOSED UPON APPELLANT.

Respected Sir,

It is very humbly submitted:

1. That the appellant has at her credit-unblemished lengthy service record and she has served Govt. with zeal & zest, to the utmost satisfaction of authorities.
2. That when the appellant was posted as DEO (F) Mardan, she was charge sheeted and served with statement of allegations due to incorrect reporting and misconception of facts. Later on, she was unwarrantedly put to Inquiry through an Inquiry Committee constituted under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules 2011. The inquiry report was submitted without fair trial, in absolute departure of prescribed procedure, entirely against the ground realities and the record, as well.
3. That the Inquiry Committee did not appreciate the fact that the appellant fairly performed her duty as DEO (F) Mardan. When she identified bogus activity of manipulating fake orders, she took the immediate steps to launch inquiries vide Endst: NO. 4902/G dated 09-11-2020 and Endst: NO. 4976/G dated 16-11-2020, besides intimation to DPO for FIR against the culprits vide letter NO. 4985 dated 16-11-2020. Resultantly, the gang of culprits joined hands against the appellant to victimize and get her away from the station. [Copies of the said letters are annexure: A, B, C]
4. That ultimately, having been misled by the null & void inquiry report, major penalty has been imposed upon the appellant, vide the impugned Notification, mentioned in the above subject with necessary details. [Copy of the Notification is annexure: D]
5. That the impugned Notification coupled with all the proceedings prior to it are illegal, based on mala fide, against the law and procedure, in utter infringement of relevant Rules, in absolute violation of settled principles of natural justice and in sheer contravention of constitutionally guaranteed rights of the appellant. Hence, the appellant avails this opportunity to submit before your good self the following grounds for sympathetic consideration.

GROUNDS

1. That in the above mentioned circumstances, distorted and tainted facts, containing false allegations, were reported to authorities with the ulterior motive to save the actual culprits and make the appellant an escape goat. The impugned inquiry, the proceedings thereafter, and the consequent Notification are therefore malafide, arbitrary, capricious, void ab initio, legally incorrect, factually wrong and based on misjudgment. Hence, not tenable.

That the vague Charge Sheet & the ambiguous Statement of allegation served on the Appellant were deficient and misleading. The inquiry committee was not validly constituted. The inquiry committee did not follow the law & prescribed rules during the proceedings. The appellant was not duly associated with the inquiry proceedings. Evidence was not recorded according to law and the documents collected and referred by the inquiry committee were neither shown nor discussed with the appellant for their correct appreciation. The authenticity and relevancy of the relied upon documents was not ascertained. Irrelevant

SSG
BT/12

ASCA
13-12-22
SECRETARY DIARY
No. 3368
Date 13/12/22

SO (129)

Attached
Secretary (Inquiries)
Secondary Edu. Deptt.
Khyber Pakhtunkhwa

documents were considered and the relevant documents were not considered. The explanation of the appellant was not read by the inquiry committee with attention nor it was given due consideration. It was referred in inquiry report in wrong contexts, without application of mind and was misconstrued. The disputed questions of law and facts emerged in inquiry were ignored, instead of putting them to a fair test of trial. No fair chance of defense was provided to appellant and practically the appellant has been condemned unheard. The inquiry report itself is highly sketchy, unreasonable, biased, non-speaking, unjust, baseless, untrustworthy and totally in violation of Rules. Therefore, the punitive action based thereon has been misjudged. It is devoid of force and not sustainable.

- III. That the appellant was not provided complete inquiry report with the annexed or referred documents nor was she extended personal hearing by the competent authority in accordance with the Rules. As such she has been materially prejudiced during the proceedings. Consequently, the penalty imposed vide the Impugned Notification is not sustainable.
- IV. That the appellant is innocent. She has denied all that has been alleged against her. Majority of the allegations against the appellant have not been proved as admitted in inquiry report. The allegations about transfers have been emphatically refuted by the appellant and the inquiry committee instead of understanding the true facts, has adopted incorrect view, without any proof, having been misled by mistaken assumptions, conjectures and surmises. Similarly, the appellant has sternly denied signing any fake appointment but the inquiry committee blamed the appellant without their being genuine, reliable and cogent proof. Hence, the basis being worthless, the impugned Notification is liable to be set aside.
- V. That the quantum of major penalty, viz'-a-viz' the allegations, do not commensurate. The excessive punitive action is too harsh and not sustainable, on this score too.
- VI. That pre and post, each and every step of the proceedings behind the Impugned Notification are in violation of recognized principles of natural justice and the fundamental rights relating to fair trial and treatment in accordance with law. The inquiry committee and the competent authority have conceived the inquiry report in vacuum because conclusions have been drawn without there being legal evidence in support of charges and the appellant's legal rights to defend her against the documents referred in the inquiry report, was withheld. Hence, grave injustice has been done to appellant which demands your good-self's attention for her redressal, in the interest of justice and to promote rule of law.

It is, therefore, humbly prayed that the appellant may graciously be given opportunity of personal hearing, she may kindly be exonerated from the charges levelled against her and the impugned Notification may be set aside.

Attested

[Signature]

Section Officer (Inquiry)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa

Date: 13/12/2022.

Appellant

[Signature]

District Education Officer
Farzana Siddiqi
District Education Officer (F)
Lakki Marwat.

Replies of Mst Rukhsana Raheem (Annexure E23-E36)

Charge 1.3 You, although not part of district DSC Meetings, yet signed minutes of the meeting for appointments etc.

Reply

I was just titular part of District DSC Meeting. But DEO Never invited me in any meeting. She did all work related to appointment outside office especially (Misses Hanyal) school. One at the meeting minutes of person DEO requested me to sign person meeting minutes although was not involved in any recruitment/ appointment process. I accepted DEO request at that time senior clerk Sartaj brought meeting minutes for signature. He told that its class four meeting minutes thus I sign it. After some time I noticed that he hide Ct meeting copy in it. Fraudulently he take my signature on CT. I complaint about that to honorable Director with reference No 1699 Dated 16/04/2020 when senior Clerk take fraudulently my signature on CT minutes thus I informed Director with reference letter no 1748 Dated 07/05/2020. I also forwarded copies to DC Mardan and Manger employee and exchange cured Mardan. Without this card same class four were recruited NAB inquiry was also under process in this matter. Thus I forwarded a copy to manger employ that I was not involved in any process regarding class.

Conclusion

Reply of the accused apparently seems convincing. As soon as she noticed certain irregularity in the minutes, she immediately complained both in writing and through SMS to the concerned authority for taking remedial measure. **CHARGE NOT PROVED**

Charge 2.4 you did not verify service documents of under transfer employees before activating their salaries.

Reply

I took charge of DDO and remained DDO wef 12.08.2020 to 30.11.2020 (3 Months 12 days). During the course of this period no under transfer teacher's service documents came to me for verification nor salary activation. All the teachers and clerks appointed or transferred belong to high and higher secondary schools, that have their own DDOs. Mst Farzana Sardar had forbidden me to visit high and higher secondary school (Copy Attached). I remained DDO only for 3 months and 12 days.

Conclusion

Transfer orders placed at B-27 till B-17 have been verified by the DEO (F) Mardan Office, however this does not exclude the possibility of the non verification of other transfer orders which according to verbal complaints are in hundreds. However the charge could not be proved with documentary evidence. **CHARGE NOT PROVED**

Attested

S. P. Khan
 Section Officer (Inquiries)
 Elementary & Secondary Edu. Deptt.
 Govt. of Khyber Pakhtunkhwa

Mst Rukhsana Raheem

Mst Rukhsana Raheem

Charge 3/5 You are responsible for fake appointment of Mst Asma CT.

Reply

M. Farzana

Ist of all I informed Director Sahib about the FAKE appointment of Mst Asma CT GGHS Moti Banda vide letter #1793 dt 29.10.2020 that was received by him personally (Copy attached) and vide SMS that is existing on record I informed director about all the 3 appointment orders of Asma CT that she on 14.09.2020 was transferred from GGHS Khanori malakand to GGHS Kotkey Mardan. Khanori exists in a far flung area of malakand I asked from DEO(F) malakand they replied that there was no Higher secondary school in khanori whereas only one girl primary school exists in khanori, SMS is existing on record. Then I informed director sb that in FTS two orders had been issued in respect of Mst Asma vide #104/G dt 11.05.2020 and #1706/G dt 11.05.2020, both the numbers are not existing in the record of DEO(F) mardan. All bogus appointees turn up in August 2020 and i reported them all to director in October 2020. after wards reports were submitted to Anti corruption and NAB. When this information of my reporting was sent to Mst Farzana Sardar she with the connivance of Mr Younas the brother of Mr Shokat MPA tried to defame my Position. Farzana sardar fultsely refused to own the transfers of NTS teachers she made, disowning her own signatures. I sent the signature of Mst Farzana sardar to director sb for sending to forensic laboratory for verification. that letter had been received by director himself. The signature over the citizen portal complaint had been put by Mst Farzana Sardar and is not photostated. You may verify that signs. In those days there was an enquiry going on in mardan headed by Mr Ishfaq Director ESRU I described some bogus appointments of Mr Ishfaq that infuriated Mst Farzana Sardar so she with the help of Mr Usman J.C. (Whome you invited as witness against me during the course of our personal hearing) and who is the Personal Assistant of MPA Mashwani hatched conspiracy against me in MPA hostel that all these appointments have been made by Mst Rukhsana Rahim DDEO. Mr ishfaq had come again for enquiry on 05.11.2020 on that very day the mother of Farzana had passed away, Mr Ishfaq asked me for the detail of bogus appointments so I handed over that annoyed Mst Farzana sardar. When Mr Ishfaq came again for enquiry on 16.11.2020 Mst Farzana sardar wrote against me in the last week of November or december whereas the bogus appointments had been unearthed in 2020, so with out spoiling time I informed director sb through sms and letters. why did Mst Farzana not report me in writing at that time. Asma CT was working in GGHS Kotkey and her salaries were being drawn from GGHS Moti Banda and Head Mistriss GGHS Moti Banda had given cheque collection/receipt authority from treasury of Mardan, to her fake JC immad. Asma CT P#is 952808 and has received no salary and arrears. On the intimation of Mst Sarwat bogus Lab Asstt I stopped the cheque of salatriis and arrears in respect of Mst Asma CT. My job was reporting to the high ups which I did. Removal was the prerogative of DEO and Director. She was not removed rather she ran away and hide herself.

Conclusion The accused was not on good terms with Mst Farzana Sardar, the then DEO (F) Mardan and had been excluded from the official hierarchy in

8
Attested
Section Officer (Institutes)
Govt. of Punjab Funitankhwag
Mr. Deptt.

M. Farzana

the office of DEO (F) In fact most of the documentary documents reveals that most of the files were submitted by Mr. Sartaj dealing assistant for AT,DM,Qaria, -----direct to MST Farzana Sardar DEO(F) without routing the same through proper channel i.e Superintendent, ADEO both primary and Secondary and Deputy DEO. Charge Not Proved

Charge 4/6 Mr Israr, fake employee, got inducted with your advent while you were posted as DDEO, Mardan.

Reply

I was DDEO(F) Mardan wef 08/08/2019. DEO(F) Mardan was not allowing me any peerform any official duty. DEO(F) Mardan was doing all the posting transfer through clerks. Allah is witnessed that I did not know whether Mr Israr is genuine or bogus. I have seen him in the office of the Higher secondary school Kallang. I have seen him at various places with the Miss Rabia, head mistriss GGHS Moti Banda. Collection of cheques authority had been issued to Mr Israr JJC by Mst Rabia I/C GGHS Kotkey. Mr Israr service card had also been signed by Mst Rabia. The service card of other bogus clerk Mr Imad JC also bears the signatures of Mst Rabia. Other two sisters of Bogus clerk Mr Imad JC named Mst Azra CT and Mst Maryam SST had also been appointed by Mr Israr JC. The cheque collection authority in respect of Mst Asma CT had also been issued by Mst Rabia to bogus Imad JC. I intervened well in time and stopped the cheque in treasury. Mst Rabia is supporting all the bogus Mr Israr, Mr Imad JC and Asma CT. When Mst Rabia is in Kotkey Mr Israr is accompanied by her and when she comes to GGHS Moti she draws the salary of Bogus Asma CT. I find out these bogus appointees in the way described below:-

Some one sent me the appointment order of Mst Sarwat. She had been appointed as Qaria in GGHS Shamozai. On 19th october some one upleaded a complaint on citizen portal that DEO is getting Rs50,000/= for each transfer. I wrote on that printed complait to DEO that her frequent and repeated orders of transfer of teachers had made the condition of the district a worst as 6 schools were closed and 45 schoold turned to single teacher and also wrote that you have appointed Mst Sarwat as Qaria with out any advertisement and DFC. DEO had seen that letter. And had put her signature and said that she is not afraid of these complaints. On 22nd october a chowkidar called me on phone saying that a girl had been appointed in our school on laboratory assistant. I went to GGHS Kohi Barmol. As the school was far away so I coult not reach well in time. I asked chowkidar about the address of Mst Sarwat Lab Asstt. I prassurized her that she will be jailed and FIR will be lodged against her. Sarwat was frightened so she handed over two othe appointment orders one of Qaria and other of Lab Asstt the former had been issued on 15.10.2020 and the latter on 22.10.2020. sarwat wem on weeping saying that she is not the sole bogus other bogus have been appointed. My cousin Mst Nusrat CT, Mst Sumdal, Maryam and Asma have also been appointed. When I asked who did issue these orders she said that her order has been issued by Mr Israr JC. Then DEO(F) Mardan ordered an enquiry in the instant case. Sarwat had given in writing to enquiry officer Mr Arshud Hussain that when it was pointed out that the order of Mst Sarwat is bogus, on that day the brother of MPA shokat named younas, who is a clerk in GHS Alo called Sarwat and

[Handwritten signature]

[Handwritten signature]

Attested
 Section Officer (Inquiries)
 Govt. of J.Ky. I.P.S. No. 1124

her father to MPA Hujra and pressurized them not to name Mr Israr JC, other wise her academic credentials will be spoiled and an FIR will be lodged against her and she will be jailed. Sarwat had recorded this statement in the office of the Anticorruption. Attached Two clerks of DEO office Mr Sartaj and Mr Murad were also present in the Hujra. Sarwat had admitted in front of all that her orders had been issued by Mr Israr JC. Then other bogus appointments were unearthed and I informed Director Mr Hafiz Ibrahim through SMS and in writing to him on 29.10.2020 that had been received by him personally. Farzana said that she is not afraid of any one. Then I informed NAB of all bogus appointments. NAB replied to my letter and invited me to office. But I did not go there. I wrote a letter to Anti corruption on 19.11.2020 for lodging an FIR against Mr Israr JC along with the detail of bogus appointments made by Mr Israr JC. Anti corruption replied that an FIR had already been lodged against Mr Israr JC for putting the bogus signatures of Judge of peshawar High court in 2018, but he was roaming freely till 2020, but after my complaint he was arrested on 21.02.2021 and is still in jail, as high court and supreme court had rejected his bail. Now sarwat had also a witness against Israr in the court of Anti corruption establishment.

conclusion	The accused was not on good terms with Mst Farzana Sardor, she then DEO (F) Mardan and had been excluded from the official hierarchy in the office of DEO (F). In fact most of the documentary documents reveals that most of the files were submitted by Mr. Sartaj dealing assistant for AT, DM, Qaria, -----direct to Mst Farzana Sardar DEO(F) without routing the same through proper channel i-e Superintendent, ADEO both primary and Secondary and Deputy DEO. Charge Not Proved
------------	--

Lubna Tauheed A questionnaire (Annexure A4) had already been served upon Lubna comprising of 16 questions including those questions reflected in the charge sheet. Mst Lubna replied (Annexure B15-B21) by her as follow. The first 5 charges are reflected in the charge sheet.

Charge 1/3:- Four fake employees were inducted while you were principal GGHSS Koper Mardan wef 06.03.2019 to 03.09.2020.

Reply :-

I did not allow four employees, I allow two namely Israr & Sumbal after following proper procedure of verification from the concerned office (DEO F). (Annexure C71) Among the fake employees only two - i) Israr as J/c (Annexure A98) and ii) Sumbal as laboratory assistant took charge in GGHSS Koper. (Annexure B6) The transfer order of Israr was from Directorate Peshawar that I received through post and I send it for verification to DEO (F) Mardan. The verification from DEO (F) was also received through post. Once verified from the concerned quarter I had no reason to refuse giving charge.

Attested
 [Signature]
 Section Officer (Inquiries)
 Elementary & Secondary Edu. Deptt.
 Govt. of Khyber Pakhtunkhwa

Similarly Sumbal had also an appointment order (appointed in deceased quota) signed by the then DEO(F) Mardan, and I verified it from the DEO (F).

The other two employee iii) Nusrat and iv) Karishma took charge after my transfer from that school. I left the school on 3-9-21 while Nusrat took charge in GGHSS Koper as CT on 5-10-20 and Karishma as lab.assistant on 31-10-21. So the later two cases are not of my tenure.

Conclusion :-

Perusal of the record reveals that appointment order of Mr. Israr was sent to Directorate for verification vide letter no. 457/ dated 17/09/2019 . while the verification documents in respect of Mst Sumbal Lab Asst proves negligence of the accused. So far as induction is concerned, Lubna Tauheed is not responsible for induction/appointment. Payments to the Fake employees during her tenure could not be proved.

Mst Nusrat CT took charge on 05.10.2020 after her transfer from that school. Mst Lubna left the school on 3-9-21 while Nusrat took charge in GGHSS Koper as CT on 5-10-20(Annexure B22) and Karishma as lab.assistant on 31-10-21. So the later two cases are not of her tenure **CHARGE NOT PROVED**

[Handwritten signature]

[Handwritten signature]

Charge 2/4	you adjust fake employees in GGHSS Koper Mardan while you were Principal of the school.
Reply	Both provide original appointment order, I verified the original appointment order from DEO (F). Nusrat CT took charge in October 2020 after my transfer GGHSS Koper. Therefore Nusrat should be excluded from charge sheet.(Annexure C71), I did not adjust any fake employee, as I was/am not the appointing authority.
Conclusion	Same as conclusion of charge . I Charge Not Proved.

Charge 3/5	You being principal of GGHSS Koper Mardan, neither demanded original orders nor verified the same before release of salary of fake employee Mst Nusrat
Reply	I am not directly responsible sir, as I am not the appointing and

[Handwritten signature]
Office (Inquiries)
Elementary Education
Govt. of Khyber Pakhtunkhwa

	transferring authority (Annexure C71) Nusrat took charge in GGHSS Koper after my transfer from that school. The then incharge miss Yadmin gave her charge. I did not gave her charge.
Conclusion	
Same as conclusion of charge 1. <u>Charge Not Proved.</u>	

Charge 4/6	You being EX-Principal GGHSS Koper Mardan are directly responsible for etment andab negligence in the case of fake appointments
Reply	Allegation 5 is not related to me because I never performed duty as DEO (F) Mdn. (Annexure C72). Nusrat took charge(Annexure B22)in GGHSS Koper after my transfer from that school. The then incharge miss Yadmin gave her charge. I did not gave her charge.
Conclusion	
Same as conclusion of charge 1. <u>Charge Not Proved.</u>	

Charge 5/7	3. You being Ex-DEO (F) Mardan are responsible for fake appointment of Mst Karishma Shah Lab Asst.
Reply	I never perform duty as DEO Mardan, so this allegation is not related to me
Conclusion	<u>Charge not proved</u>

Naheed replies (E37) to questionnaire and conclusion of the committee

Only one question first was included in the charge sheet

Charge 1/3	You being incharge of GGHS Shamozai Mardan are involved in induction of fake employee, Mst Azra CT.
Reply	I don't know Azra. She did not receive charge from me.

Naheed

12
 Elementary & Secondary Edu. Deptt.
 Govt. of Khyber Pakhtunkhwa

Reply

That I am not involved in any type of fake appointment in my tenure. The appointment orders of the Mst. Sarwat Lab Assistant is totally fake & fictitious one having fake/scanned sign with the bogus dispatch Nos. The same have no record in office register. Two different appointment orders have been made on two different dates. The first order Endst No. 5051-56 dated 13-10-2020 is clearly fake one which is evident from the body of the appointment order where in it is written as "against the post of Certified Teacher (Qari) in (RPS-12/Rs. 13320-960-42120)". While the second order is of the Deceased Son's Quota which is also fake with bogus dispatch No. having no record in the office dispatch register. (Copies attached as Annex - "D", "E")

Conclusion

Mst Sarwat recorded her statement that Mr Israr JC prepared two appointment orders for her one as Qaria in GGHS Shamozai and the other as Lab Asstt in GGHS Kohi Barnol. Later on both the orders were found fake so both the orders were returned to Mr Israr JC so Mr Israr JC requested her not to mention his name and mention the name of Mr Fawad. After wards Mr Younas invited me and my father to the Hujra of Malak Shokat, MPA and pressurized us not to mention Mr Israr JC other wise they threatened me to spoil my academic credentials and an FIR will be lodged against me. At this moment Mr Murad SC and Mr Sarraj SC of the DEO office were also present (Annexure C69). However the charge could not be proved with documentary evidence.

[Handwritten signature]


[Handwritten signature]

Charge 4/6	You are responsible for induction of fake employee Mr Imad Khan JC DEO(F) office Mardan
---------------	---

Reply

That I am not responsible in the induction. However, the fake induction of Mr Israr Junior Clerk was disclosed to the office on his arrest by the law enforcement agencies. During checking the it was found that he was duly transferred from district Malakand and his transferred was also verified Vide Endst No 14120 dated 04/10/2020 from the concerned quarters. (Copy attach to Annex "F"). I am totally unaware of the appointment of Mr Immad JC

Conclusion	<u>Charge Not Proved</u>
------------	--------------------------

Attested

 Section Officer (Inquiries)
 Elementary & Secondary Edu: Deptt:
 Govt of Khyber Pakhtunkhwa

Mr Nisar Replies(B72-75) to questionnaire already served upon Mr Nisar SC GGHSS Koper Mardan the first question/charge is existing in the charge sheet

Charge 1/3	You, being SC at GGHSS Koper Mardan are directly responsible for abetment and negligence in the case of fake appointments.
Reply	I did not include any fake employee because I was not appointment and transfer authority two fake appointment was made by Mr Israr JC at my tenure. Mr Israr is responsible for this fake appointment
comments	This was the whole responsibility of the senior clerk to have a check on illegal actions being done in his jurisdiction by his junior clerk. So he badly failed in carrying out his responsibility but the argument/ proof he presented in his support as he was not allowed to visit office due to corona gains gravity so the <u>Charge Proved.</u>

Questionnaire (Annexure A10-A11) comprising 35 questions including the three questions shown in the charges sheet issued to Mr Israr Junior clerk their Replies(Annexure B76-B79) and comments of the enquiry committee are as under

Charge 1/3	you, being clerk at GGHSS Koper Mardan are directly responsible for abetment and negligence in the case of fake appointments.
Reply	I am not responsible for any kind of bogus appointment as I was not the competent officer.
conclusion	Mr Israr is really not the competent authority rather he is a MAFIA/Eminence Grise. Doing these illegal appointments through transfer from other districts. <u>Charge Fully Proved</u>

Charge 2/4	you are responsible for fake appointment of Mst Asma CT.
Reply	I am not aware of of the appointment of Mst Asma CT and have no information about.
conclusion	If he does not know Asma CT, how did he come to know that her salary had been issued from GGHSS Moti Banda whereas the cheque had been returned, as he replied in question 8. <u>Charge FULLY Proved.</u>

Mr Israr

Mr Israr

Attested

16

[Signature]

Secretary
 Government of Khyber Pakhtunkhwa

Conclusion	Though the charge of fake appointments could not be proved with documentary evidence. However his negligence in the matter could not be ruled out.
------------	--

Charge 3/5	You are responsible of induction of fake employee, Mst Sarwat Lab Assit.
------------	--

Reply	That I am not involved in any type of fake appointment in my tenure. The appointment orders of the Mst. Sarwat Lab Assistant is totally fake & factitious one having fake scanned sign with the bogus dispatch Nos. The same have no record in office register. Two different appointment orders have been made on two different dates. The first order Endst No. 5051-56 dated 13-10-2020 is clearly fake one which is evident from the body of the appointment order where in it is written as "against the post of <u>Certified Teacher (Qari)</u> in (BPS-12/Rs. 13320-960-42120)". While the second order is of the Deceased Son's Quota which is also fake with bogus dispatch No. having no record in the office dispatch register. (Copies attached as Annex - "B", "C")
-------	--

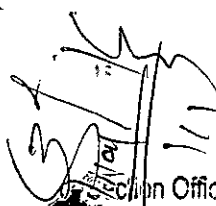
Conclusion	Mst Sarwat recorded her statement that Mr Israr JC prepared two appointment orders for her one as Qaria in GGHS Shamozai and the other as Lab Assit in GGHS Kohi Barnol. Latter on both the orders were found fake so both the orders were returned to to Mr Israr JC so Mr Israr JC requested her not to mention his name and mention the name of Mr Fawad. After wards Mr Younas invited me and my father to the Hujra of Malak Snokat, MPA and pressurized us not to mention Mr Israr JC other wise they threatened me to spoil my academic credentials and an FIR will be lodged against me. At this moment Mr Murad SC and Mr Sartaj SC of the DEO office were also present (Annexure C69). <u>However the charge could not be proved with documentary evidence.</u>
------------	---

Charge 4/6	You are responsible for induction of fake employee Mr Inaaf Khan JC DEO(F) office Mardan.
------------	---

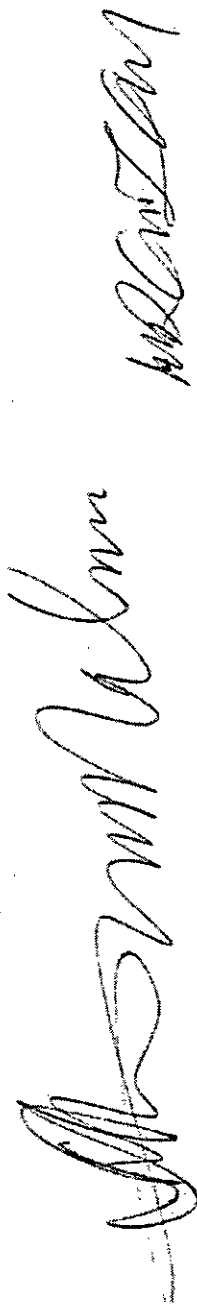
Reply	That I am not responsible in the induction. The fake induction of Mr Israr Junior Clerk was disclosed to the office on his arrest by the law enforcement agencies. As per record he was shown duly transferred from district Malakand and his transferred was also verified Vide Endst No 14120 dated 04/10/2020 from the concerned quarters. (Copy attach as Annex "D")
-------	--

Conclusion	<u>Charge Not Proved</u>
------------	--------------------------

Attested



Section Officer (Inquiries)
Elementary & Secondary Edu: Deptt:
Govt. of Khyber Pakhtunkhwa



Conclusion

1) Sumbal has been appointed as Laboratory Assistant (Annexure 262) in GGHS Koper Mandan CC Mr-6254 with other particulars as per CNIC# is 1610207012825 D.O Rahmat Khan F#932774 DOB: 12/01/1988 DOA as 08/01/2020 her salaries were being sent to MCB Account #883877777777 the bank levy was 241848 her position code was not known that is why she was given integrated default post her pay is stopped at the moment

2) The same Sumbal with a bit addition of Sumbal Israr has been appointed (Annexure 263) as SS in GGHS Koper Mandan CC Mr-6254 with other particulars as per CNIC# is 1610207012826 D.O Rahmat Khan F#934100 DOB: 12/01/1986 DOA as 05/09/2019 her position code was not known that is why she was also given integrated default position her pay is stopped at the moment

3) Like Mst Lubna a great many heads of schools don't know the basics of administration, training needs to be given to them before assigning the responsibility of the headship.

4) The committee, in the light of the remarks of Naheed SSI GGHS Shamozai during her personal hearing, decided to call Mr Aqib Imroz JC GGHS Shamozai Mandan for personal hearing so a letter was issued to him vide Annexure D18 besides that two complaints one annexed as (D1) and the other the remarks of Mst Naheed who verbally stated that Mr Aqib Imroz was cutting deal with people for bogus appointment, her this very statement was fortified by the complaint handed over to the committee by Mr Farhad an aspirant of appointment in education who is now working in police his Mobile #03433003114

5) Mst Naheed incharge GGHS Shamozai charged Mr Aqib Imroz for releasing salaries of Mr Sultan Ali Chowkidar GGHS Shamozai Mr Sultan Chowkidar was served with a show cause (Annexure D21) by the then DEO(F) Samina Ghani and had stopped the salaries of Mr Sultan Ali Chowkidar. But Mr Sultan Chowkidar salaries were released, that annoyed Naheed the incharge and wrote against his clerk Mr Aqib Imroz JC. Mr Aqib Imroz JC was served with a questionnaire (Annexure D22) An appeal/application (Annexure D23) was submitted by Mr Sultan Chowkidar accompanied by Mr Aqib Ali JC during the course of his personal hearing dated 22.12.2021.

6) The complainant had complained that his other brother had also been appointed in the education department under decepted son quota besides Mr Aqib Imroz. (Annexure D1) so his family members Mr Kabir S O Shah Nazam (2) Feem Begum D O Aimal Khan (3) Aqib Imroz S O Kabir Khan (4) Ijaz Ali S O Kabir Khan (5) Sameeullah Jan S O Kabir Khan. The other inquiry already recommended may investigate this charge of 2nd son appointment.

19/12/2021

Office Incharge
Elementary & Secondary Education
Govt of Khyber Pakhtunkhwa

- 7) When asked about Mst Azra CT (Annexure D2), the bogus appointee in GGHS Shamozai Mr Aqib Imroz JC also disowned (D4) employees that were on the pay role of GGHS Shamozai mardan, so a letter was written to DAO Mardan for the detail of payment made to them (Annexure D25) beside the detail already sent by DAO (Annexure D2, D26).
- 8) Aqib Imroz JC shared his staff statement and vacant positions (Annexure D27, D28).
- 9) Aqib Imroz JC says that he was kept in dark while activating the salaries of Mr Sultan Chowkidar, and Mst Azra CT (Annexure D29), this clearly reveals that he is involved in the activation of salaries of both Mr Sultan and Mst Azra CT.
- 10) Mst Azra CT GGHS in Shamozai with PR952810 is not existing in the controller general of accounts pakistan islamabad DDOs open and filled posts in Shamozai (Annexure D35)
- 11) Mst Farzana Sardar had included Mst Rukhsana Raheem DDEO in the DPC from SPST to PSHT and had also collected the sign of the latter over the minutes (Annexure D31 to D36) it is a matter of grave concern that Mst Rukhsana being local and having ties with locals made cutting in the promotion and adjustment making the situation from bad to worse as the deserving teachers were annoyed so the Mst Farzana Sardar DEO(F) constitute a committee headed by GGHS No.2 Hoti Mardan so ameliorate the problem of wrong adjustment shown in th order (Annexure D37 to D41). As a consequence of this corrigendum was issued (Annexure D42).
- 12) Mst Rukhsana Raheem DDEO was a part of the process as is evident from note sheet (Annexure D43-44).
- 13) The incharge DEO(F) Mardan Mr Idrees had written a complaint (Annexure D45) to Director E&SE KP that Mst Rukhsana Raheem was a part of the DSC but she latter erased her signs that made the documents suspicious.
- 14) Mst Rukhsana Raheem DDEO was also a part of CT appointment (annexure D46-47)
- 15) Mst Rukhsana Raheem DDEO has really eat her signatures (Annexure D48)
- 16) Mst Farzana Sardar DEO(F) has made Mst Rukhsana Raheem DDEO as part of every committee of departmental selection viz viz for CT (Annexure D49-50) for IT (Annexure D51-52).
- 17) Mst waheeda Naz SDEO(F) Takht Bhai has replied (Annexure D53-64).
- 18) Mst Shehla SDEO(F) Katlang has replied (Annexure E3-4).
- 19) It is to the astonishment of enquiry committee as to how a single teacher Mst Sumbal is being allotted two personal numbers and ...

A. H. S. A.



Section Officer (Inquiry)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa

laboratory assistants and one as subject specialist as per 11/1/20 and that both are existing on controller general of accounts Islamabad DDOS open filed posts (Annexure D67) one or both the personal numbers may be arrested any time in future by MAFIA

20) Mst Rukhsana Rahim stated that a great many bogus employees have been inducted in the system among which she provided the name of Mst Shehna SS Faheer the daughter of Mr Taj Mohammad who was earlier working as PST in GGPS Huzar Banda Lunkhwar and then transferred to orahai agency and came back as SST in Mrdan tooru.

21) Mst Rukhsana Rahim stated that a great many bogus employees have been inducted in the system among which she provided the name of Mst suraya laboratory Assistant. She has been bogusly appointed in GGMS Haji abad Mardan.

22) Mst Rukhsana Rahim stated that a great many bogus employees have been inducted in the system among which she provided the name of Mst Kauser Parveen. She was working in mohmand agency and then came to swabi and from swabi Mst Rukhsanana stated that she came to GGHS Kani grahi Mardan. Certain papers (Annexure D73-D92) regarding Mst Kauser Parveen were collected from her school that were critically scrutinized and it was found that she has once reported as SS in Islamiat by her principal while in rest of the documents she is SS in Pakistan studies. Critical examination and further investigation will disclose the actual position.

23) Mst Nasira PST (Annexure A34) GGPS Ahmad Saeed Kot Dist North Waziristan has been shown as transferred to GGPS Alam Karoona Lod Lower Man vide order #4228-32/34 dt 22.02.2020. The committee scrutinized its papers (Annexure D94-D100) and record its observations. DEO(F) Mardan has issued three letters vide her #2187, 2188, 2189 on 15.06.2020 (Annexure D94, 95, 96) to three different offices DEO(F) NWD, DAO NWD and Director E&SE KP respectively. Among these letters DEO NWD responds on 17.06.2020 vide #5827 and receives in the office of DEO(F) Mardan on 22.06.2020 whereas the same has been marked to ADEO Primary on 20.06.2020 (Annexure D97). The DAO had already been addressed by DEO(F) Mardan for verification of LPC vide her #2188 dt 15.06.2020 who responded with no stamp and number (Annexure D98-99) and Mst Farzan Sardar released her salaries (Annexure D100). It needs further verification as to the said teacher is genuine or otherwise.

24) Like wise the documents in respect of Mst Saira Mukhtiar PST GGPS Aman Tabar tribal district mohmand daughter of HABIB UL MUKHTAIR P=50512304 is also suspicious. The one annexed as E1 with a stamp "District Account Officer" where as the correct word is Accounts and not account. Both of her particulars in mohmand and Mardan are the same like CNIC=1010104336790 DOB 09.05.1993 DOA 21.09.2016 and her Bank in mardan it is HBL with Key of the bank as 220441

[Handwritten signature on the left margin]

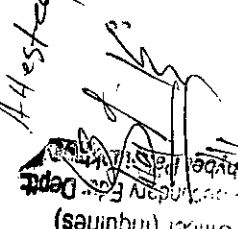
[Handwritten signature on the right margin]

[Handwritten signature and initials at the bottom center]

and account #7900591903 whereas in mohmand it was ABL with key as 830. it needs further verification as to the transfer has been made through proper way or otherwise.

S#	Name	P#	Salary drawn	Cummulative total	Period	Inactive wef
1	M.Israr JC B-11 GGHS Koper Banda	926 918	Rs411318(19m onths)	Rs411318 /=	01.06.2019 to 31.12.2020	01.01.2021
2	Nusrat CTB- 15GGHS Koper Banda	953 073	Rs55332(2Mon ths)	Rs466650 /=	01.10.2020 to 30.11.2020	01.12.2020
3	Sumbal/Asst B-7GGHS Koper Banda	932 174	Rs211490(11M onths 24days)	Rs678140 /=	08.01.2020 to 31.12.2020	01.01.2021
4	MaryamSST B-16GGHS Koper Banda	932 315	Rs688144(21m onths)	Rs136628 4/=	01.04.2019 to 31.12.2020	01.01.2021
5	Sumbal Israr SSGGHS Koper Banda	954 100	Rs102832/= (2months)	Rs149611 6/=	05.09.2019 to 30.11.2020	01.12.2020
6	Azra CT GGHS Shamozai	952 810	Rs521880/= (18months)	Rs199099 6/=	01.06.2019 to 30.11.2020	01.12.2020
7	Asma CT GGHS Moti Banda	952 808	Rs162744/= 5months 19days)	Rs215374 0/=	13.05.2020 to 31.10.2020	01.11.2020

25) A letter had been sent to DEO(F) Mohmand(Annexure A53) along with a list of (08) employees (Annexure A54) who had been on the pay role of DEO Mohmand and are now on the pay role of DEO(F) Mardan and asked DEO (F) Mohmand to convey the mode of their recruitment in Mohmand and mode of transfer to Mardan and also the mode of promotion of Mst Shaheen Aslam CT/SST. Mst Riaz Begum DEO(F) Mohmand disowned Mst Shaheen Aslam CT stating that she has no record in Mohmand district and submitted report on whatsapp (Annexure D19). The committee went to Mohmand asking DEO(F) to verify Mst Shaheen Aslam CT/SST record from accounts office Mohmand as the whatsapped letter had no sign. Mst Riaz Begum owned remaining Seven Employees(Annexure D20), and owned Mst Saheen Aslam CT(Annexure E3) admitting that Mst Shaheen Aslam CT had been working in Mohmand wef 01.11.2004 to 31.12.2012 under P#110439. Further investigation

A4sted

 Section Officer (Inquiries)
 Element of Khuzdar District
 Dept. of Khuzdar District

needs to be made as to the facts about Mst Shalween Aslam CT are correct or otherwise while investigating her payment record in Mohmand district it was revealed that she had been appointed on 21.04.2001 whereas Mst Riuz Begum admits her payment wef 01.11.2004 to 31.12.2012. Where was she working during the period wef 21.04.2001 to 31.10.2004, as the Mohmand payment record shows her first appointment on 21.04.2001.

Recommendations:-

Utmost efforts were made to objectively fix responsibility in the form of whether charge proved or not in the conclusions, below each reply to the charges of each accused, save the one Mst Yasmeen SST (G) Ex-incharge GGHSS Koper Mardan who reportedly has passed away. The quantum of penalty may be imposed in the light of the nature of charge and its gravity. It is further recommended that:-

1. (07) separate FIR may be lodged against Mr Israr JC for illegalities committed by him in E&SED KP, the one that has already been lodged by Higher education as a consequence of which he is now a days in jail, photographs of his existence in jail (Annexure F 87-89). One FIR may be lodged by the Secretary to Government of KP E&SED KP for fakely appointing Mst Sumbal Israr as SS in GGHSS Koper and (06) others FIR may be lodged against Mr Israr by the DEO (F) Mardan 1st in case of appointing himself bogusly through transfer from GGHSS Khanori Malakand where there is no Girl Higher secondary school, and 2nd FIR each in case of direct induction of Mst Nusrat CT GGHSS Koper Mardan 3rd Mst Sumbal Lab Assst GGHSS Koper Maraan 4th Mst Maryam SST GGHSS Koper Mardan 5th for appointing Mst Sarwat as Lab Assst GGHSS Koper 6th for appointing Asma CT through transfer from GGHSS Khanori Malakand where there is no Higher secondary school (Annexure B1,2)

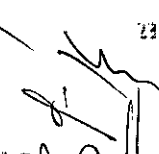
2. All the employees transfer orders listed in (Annexure 2-3,20,22-23 &25-32) issued by:-

a) Mst Farzana Sardar Ex-DEO(F) Mardan either with her own signature or with her scanned signatures mentioned in the lists above whose record was not available in the office, including the number of employees (19,4,25&127) respectively, may be cancelled by the sitting DEO in a single order.

3. Deputy commissioner Mardan May be asked to recover, under land revenue Act 1981, the embezzled amount of money that had already been paid to the following fake employees through their salaries.

a) Mr Israr Junior clerk GGHSS Koper Banda Mardan

Rs1469116/= may be recovered, through land revenue Act 1981 from Mr Israr JC GGHSS Koper Mardan village Moti Banda land khwar tukht bhair mardan. The calculated amount is his own illegally drawn salaries for (19) months wef 01.06.2019

Attested

 Secretary (Inquiries)
 Elementary & Secondary Edu: Deptt.
 Govt of Khyber Pakhtunkhwa

to 31.12.2020 amounting to Rs 411318/= and that of Mst Nusrat CT GGHSS Koper for (02) months wef 01.10.2019 to 30.11.2020 amounting to Rs 55332/= Mst Sumbal for (11) months and 24 days wef 08.01.2020 to 31.12.2020 amounting to Rs 211490/= Mst Maryam SST for (21) months wef 01.04.2019 to 31.12.2020 amounting to Rs 688144/= and Mst Sumbal Israr SS for (02) months wef 01.10.2020 to 30.11.2020 amounting to Rs 102832/=.

b) Mst Nusrat CT GGHSS Koper Mardan

Rs 55332/= may be recovered, through land revenue Act 1981, from Mst Nusrat CT GGHSS Koper for her illegal payment of (02) months wef 01.10.2019 to 30.11.2020 amounting to Rs 55332/=

c) Mst Sumbal LabAsstt GGHSS Koper Mardan

Rs 211490/= may be recovered, through land revenue Act 1981, from Mst Sumbal LabAsstt GGHSS Koper Mardan for illegally getting salaries for (11) months and 24 days wef 08.01.2020 to 31.12.2020 amounting to Rs 211490/=

d) Mst Maryam SST GGHSS Koper Mardan

Rs 688144/= may be recovered, through land revenue Act 1981, from Mst Maryam SST GGHSS Koper for illegal payment of salaries for (21) months wef 01.04.2019 to 31.12.2020 amounting to Rs 688144/=

e) Mst Sumbal Israr SS GGHSS Koper Mardan

Rs 102832/= may be recovered, through land revenue Act 1981 from Mst Sumbal Israr SS GGHSS Koper Mardan for her illegal salaries for (02) months wef 01.10.2020 to 30.11.2020 amounting to Rs 102832/=.

f) Mst Azra CT GGHS Shamozai P#952810 Rs521880/=

Rs 521880/= may be recovered through land revenue Act 1981, from Mst Azra CT GGHS Shamozai bearing P#952810 for her illegal salaries of (18) months wef 01.06.2019 to 30.11.2020 amounting to Rs 521880/=

g) Mst Asma CT GGHS Moti Banda Mardan P#952808 Rs162744/=

Rs 162744/= may be recovered, through land revenue Act 1981, from Mst Asma CT GGHS Moti Banda bearing P#952808 for her illegal salaries of (05) months 19 days wef 13.05.2020 to 31.10.2020 amounting to Rs 162744/=

4. The Accountant General Office may be approached through relevant forum to take to task the staff of DAO Mardan, for:-
- Punching the source I of the following CT invoices with out checking the relevant documents of newly inducted employees with specimen signatures of the issuing authority.
 - The competent authority in E&SED KP may write to the AG KP to take to task the concerned DAO Mardan officials on whose "user name"/ "name" ...

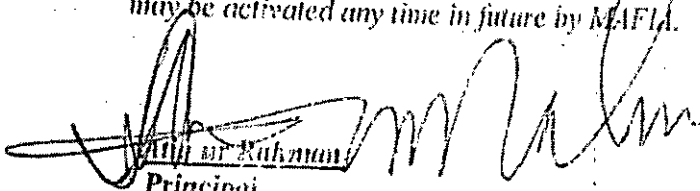
Affected
11/10/20
15


Section Officer (Inquiries)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa

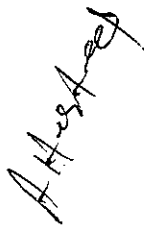
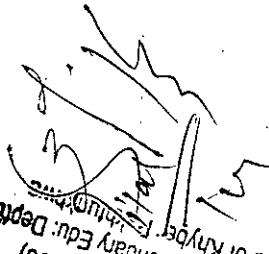
- ii. The complainant had complained that Mr. Aqib Inroz J.C. (G.H.S. Mohmand), other brother had also been appointed in the education department under deceased son quota besides Mr. Aqib Inroz. (Annexure D1). This inquiry may investigate this charge of 2nd son appointment.
- iii. Like wise a list of 31 employees (Annexure D65-66) among which 17 intra district transfer and 2 appointments against a single deceased son quota was handed over to the committee that included a complaint of two sons appointment of Marnaf one named as Shah Hussain and the other as Rauf.
- iv. And verify the genuineness of intra/inter district 63 transfers (Annexure D11-18) issued by Directorate of E&SE KP Peshawar especially the genuineness of 8 employees (Annexure A54) who came through intra district transfer from Mohmand to various cost centers in Mardan specially Mst. Shaheen Aslam who was CT in Mohmand and was posted as SET in Cost Center MR6158 in Mardan and who had been disowned by DEO(F) Mohmand (Annexure D19). It was later revealed that Mst. Riaz Begum DEO(F) had not signed D19. Mst. Riaz Begum owned remaining Seven Employees (Annexure D20).
- v. The genuineness of transfer/induction/ appointment of the employees listed A15-A43.
- vi. The genuineness of appointment made wef 01.01.2018 till 31.10.2021 (Annexure A55-A59) in various schools, mentioned in the list, in Mardan.
- vii. Whether the decision/judgement on which 2 Served PSTs had been restored in service are among the genuine 17 shown in the judgement of Peshawar High court or tempering had been made by MAFIA in the judgement including others.
- viii. Investigate the position of Mst. Kauser Parveen SS in Islamiat D/O Sakawat Shah (Annexure D85) and SS in Pakistan studies (Annexure D86) and veracity of the papers (Annexure E73- D92) she is being paid out of G.H.S.S. Katti Garhi Mardan CCMR6229, with CNIC#1610258612124 her DOB is 17.03.1975 whereas her DOA is 06.03.1996.
- ix. Further investigation needs to be made as to whether Mst. Shaheen Aslam CT (Annexure E19-20) had been appointed on 21.04.2001, as shown in Mohmand district payment record whereas Mst. Riaz Begum admits her payment wef 01.11.2004 to 31.12.2012, now question arises as to where was she working during the period wef 21.04.2001 to 31.10.2004, as the Mohmand payment record shows her first appointment on 21.04.2001. It needs investigation as to how she was promoted to SST in Mardan. (Annexure E5).
- x. Further probe needs as to whether the accused and bogus appointees were patronized by whom.

A. Kestod
 111
 Sub-Divisional Officer (Inquiries)
 Elementary & Secondary Edu: Deptt:
 Govt. of Khyber Pakhtunkhwa

- 6. It should be made binding upon all the DEOs male and female to keep a clear cut record of posting transfer and appointment and in no case loose paper orders should be issued. In case of transfer of DEO the DEO in the proximity of the district may be asked to carry out an internal audit of the transfer posting and appointment. The latter will give a certificate to the effect that all the transfer posting and appointment made in the district are on the record.
- 7. Strict directions may be issued to the DEO (F) Mardan to direct all the Principals especially Principal GGHSS Koper Mardan, not to activate the salaries of Mst Sumbal either as a laboratory assistant with personal number 932174 or as a subject specialist with P#954100, as both are existing on controller general of accounts Islamabad DDOs open filled posts (Annexure D67) and may be activated any time in future by MAFLA.


M. A. Khan
 Principal,
 Areas GHSS#1 Peshawar Cantt.


M. A. Khan
 Managing Director, Merged
 Education Foundation


 A. Hussain

 Section Officer (Inquiries)
 Elementary & Secondary Edu. Deptt.
 Govt. of Khyber Pakhtunkhwa

SHOW CAUSE NOTICE

I, Mahmood Khan, Chief Minister, Khyber Pakhtunkhwa, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve on you, Mst. Farzana Sardar (MC BS-19), Ex-DEO (Female) Mardan as follows: -

1.
 - (i) That consequent upon the completion of the inquiry conducted against you by the Inquiry Committee for which you presented your written defense before the Inquiry Committee, and
 - (ii) While on-going through the findings and recommendations of the Inquiry Officer/Inquiry Committee, the material on record and other connected papers including your defense before the Inquiry Officer/Inquiry Committee.

I am satisfied that you have committed the following acts/omissions specified in Rule-3(a&c) of the E&D Rules:

"In-efficiency & Corruption"

2. 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. OR pay scale or to a lower stage in a time scale for (5) years.
3. You are, therefore, required to show cause as to why the afore-mentioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
4. If no reply to this notice is received within Seven days or not more than Fifteen days of its delivery, it shall be presumed that you have no defense to put in and, in that case, an ex-parte action shall be taken against you.
5. A copy of the findings of the Inquiry Officer/Inquiry Committee is enclosed.

Attested
CS of CM



(MAHMOOD KHAN)
CHIEF MINISTER, KHYBER PAKHTUNKHWA/
COMPETENT AUTHORITY

Section Officer (Inquiries)
Government of Khyber Pakhtunkhwa
Secondary Education Deptt.

Mst. Farzana Sardar (Ex-DEO (Female) Mardan
Now DEO (Female) DI Khan

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the November 24, 2022

NOTIFICATION

No. SO(Inq)E&SE/1-1/2022/Inquiry/DEO (F) Mardan: WHEREAS Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) 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 Muhammad Ramzan (PCS SG BS-20) Managing Director, Merged Area Education Foundation and Mr. Atiq ur Rehman, Principal (BS-19), GHSS No. 1, Peshawar Cantt were nominated as Inquiry Committee to conduct Formal Inquiry under the ibid Rules, against Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) Lakki Marwat, for the charges leveled against her.

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

4. AND WHEREAS the Competent Authority (Chief Minister) after having considered the charges and evidence on record, inquiry report, explanation of the accused in response to the show cause notice and personal hearing granted to her by Secretary, Home & Tribal Affairs Department on behalf of the Competent Authority on 10.08.2022 is of the view that charges against the accused have been proved.

5. NOW, THEREFORE, in exercise of the powers conferred under section 14 (5) of the ibid Rules, the Competent Authority (Chief Minister), is pleased to impose major penalty of "Reduction to a lower post for a period of three years" upon Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) Lakki Marwat with immediate effect.

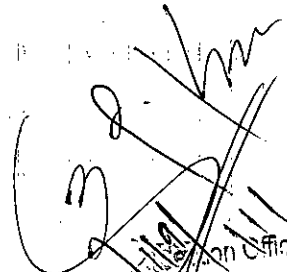
SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT


Encls: of even No. & Date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) Mardan & Lakki Marwat.
4. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
6. Section Officer (Schools/ Female), E&SE Department.
7. Section Officer (Management Cadre), E&SE Department.
8. Incharge EMIS E&SE Department.
9. Mst. Farzana Sardar, Ex-DEO (F), Mardan now DEO (F) Lakki Marwat.
10. Office order file.

Attested


Section Officer (Inquiries)
Elementary & Secondary Edu. Dept.
Govt. of Khyber Pakhtunkhwa


(Bilal Khan)
24-11-22
Section Officer (Inquiries)