


FORM OF ORDER SHEET

Court of _____

12(2) CPC Application No. 358 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	14/05/2024	<p>The application U/S 12(2) CPC in Service Appeal no. 391/2023 submitted by respondents no. 1 to 4 through District Education Officer (M) North Waziristan. It is fixed for hearing before Single Bench at Peshawar on 16.05.2024. Original file be requisitioned. Parcha peshi given to the representative of the respondent departments.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR.

12(a) CPC Petition No: 358 /2024 in Service Appeal No.391/2023

1. Director E&SE KP Peshawar,
2. District Education Officer (Male), District North Waziristan,
3. District Account Officer, District North Waziristan,
4. The Secretary E&SE Department KP Peshawar.....Petitioners.


VERSUS

Niamat Ullah, PST (BPS-12) District Education Officer (Male) North Waziristan
.....Respondent

INDEX

S/#	Description of document	Annexure	Pages No.
1	Petition Under Section 12 (2) CPC, 1908 along with affidavit.		1-5
2	Copy of the Service Appeal	A	6-9
3	Copy of the order dated 06-06-2023.	B	10
4	Copy of the Execution Petition.	C	11-13
5	Copy of the Appointment order dated 15-03-2014.	D	14
6	Copies of the Notification dated 31-01-2024 & inquiry report dated 21-03-2024.	E & F	15-29
7	Copy of the memo dated 11-11-2023.	G	30
8	Copy of the letter dated 07-12-2020.	H	31

Through :


District Education Officer,
(Male) North Waziristan
PETITIONERS No.1,2&3,
Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar.

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR.

12(2)PC Petition No: 358 /2024 in Service Appeal No.391/2023 Khyber Pakhtukhwa
Service Tribunal

1. Director E&SE KP Peshawar,
2. District Education Officer (Male), District North Waziristan,
3. District Account Officer, District North Waziristan,
4. The Secretary E&SE Department KP Peshawar.....Petitioners.

Diary No. 12763

Dated 14/5/24

VERSUS

Niamat Ullah, PST (BPS-12) District Education Officer (Male) North Waziristan
.....Respondent

**SUBJECT: PETITION UNDER SECTION 12 (2) CPC 1908 ALONG WITH OTHER
ENABLING LAWS AGAINST THE ORDER DATED 06-06-2021, PASSED BY
THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR IN SERVICER APPEAL NO. 391/2023 UNDER CASE TITLE
NIAMAT ULLAH VS GOVT; OF KHYBER PAKHTUNKHWA & OTHERS,
OBTAINED BY THE APPELLANT NOW RESPONDENT ON THE GROUNDS
OF MISREPRESENTATION, FRAUD & CONCEALMENT OF MATERIAL
FACTS REGARDING THE FAKE, FORGED & BOGUS APPOINTMENT
ORDER DATED 15-03-2014 ON MALA FIDE INTENTIONS.**

Respectfully Sheweth:-

The petitioners/applicants submit as under: -

ON FACTS:

1. The Appellant namely Niamat Ullah (hereinafter referred to as Respondent) filed Service Appeal No. 391/2023 under Section-4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 before the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar with the following prayer:

“That on acceptance of this instant service appeal of the appellant the inaction of the Respondents by not releasing salaries of the appellant w.e.f 01-07-2019 till date may very kindly be declared illegal & without lawful authority of law & the Respondents may further please be directed to release salaries of the appellant w.e.f 01-07-2019 till date with all back benefits”. (Copy of the Service Appeal is Annex-A)

2. That Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar has disposed of the afore-noted appeal vide Order dated 06-06-2021 in the following terms:

“Learned Counsel for the appellant present & submitted copy of letter No. 35016-21/DEO/NWTD dated 19-12-2022 & stated that in view of the said letter, the desired relief has otherwise been granted to the appellant, therefore, this appeal has outlived its utility. Disposed of accordingly ”(Copy of the order dated 06-06-2021 is Annex-B).

No specific order/direction has been given to the Department vide ibid orders.

- 2
3. **That** in the meanwhile the Respondent has filed Execution Petition before the Honorable Tribunal for implementation of the Order dated 06-06-2023, which is pending adjudication and is fixed for hearing on 2-5-2024 before the Honorable Tribunal. *(Copy of the Execution Petition attached as Annex-C).*
 4. **That** after filing the said appeal before the Honorable Tribunal & admission for regular hearing, the petitioners were not put on notice to contest the case on legal & factual grounds, rather the same has been disposed of against the Department (hereinafter referred to as petitioners) without providing proper opportunity for defense and submission of reply & thus the Respondent succeeded to obtain the impugned order on the basis of misrepresentation, fraud & concealment of material facts from this Honorable Tribunal.
 5. **That** the Respondent has claimed to have been appointed against the PST (BPS-12) post appointment vide order No.386-90/AEO/NWA dated 15-03-2014 under the signature & administrative authority of the then Agency Education Officer North Waziristan Agency which is fake, forged and bogus and without lawful authority. *(Copy of the Appointment order attached as Annex-D).*
 6. **That** perusal of the relevant record in the custody of the District Education Officer (M) North Waziristan transpires that no formal advertisement regarding the appointments & recruitments of Male/Female PSTs/Class-IVs has been published & floated by the E&SE Department in any National & Local Newspaper which is mandatory for the appointments in question under the prevailing law Rules & Policy, a copy whereof has not been annexed by the of the Respondent with his appeal, hence, the so-called appointment order dated 15-03-2014 is admittedly fake, forged & bogus without any shadow of doubt. Moreover, the burden of proof regarding the said order lies upon the Respondent under the provision of Article-117 of the Qanoon-e-Shahadat order 1984.
 7. **That** the record further reveals that neither written test/interview has been conducted by the Department nor any kind of Roll No/Transcript for entry test has been allotted to the appellant, whereunder the appellant has appeared for the written test & interview for the post in question, which shows that the impugned appointment order dated 15-02-2014 is self-generated & without lawful authority. Furthermore, no meeting of the Departmental Selection Committee has been held for recruitment in question as no cogent record regarding the Notification of DSC members & minutes of the DSC meeting is available in the office concerned, which prove the bogosity of the impugned appointment order.
 8. To further substantiate the plea & stand as taken by the petitioners in the instant petition against the impugned fake & bogus appointment order dated 15-03-2014, it is apprised that the Respondent has not produced/annexed the following record/documents with the main the appeal for which the burden of proof lies upon the shoulders of the Respondent under the mandatory provision of Article-117 of the Qanoon-e-Shahadat Act, 1984, which reflects the mala fide intentions on the part of the so-called official concerned:
 1. Medical Fitness certificate/report of the Physician of Civil Hospital concerned.
 2. Copy of the charge/arrival report in response to the fake & bogus appointment order dated 15-03-2014 under the signature of the authority concerned
 3. Verified attendance report in the attendance register concerned.
 4. Duty certificate from the Head Teacher, ASDEO circle or SDEO concerned.
 5. Copy of the Service Book concerned.

6. Copy of Pay Rolls whereunder the Respondent has drawn his monthly salary against the said post w.e.f 15-03-2014 to 01-07-2019 from the District Accounts Officer North Waziristan.
9. That while taking cognizance of the alleged matter under reference, the petitioner No. 4/Secretary E&SED KP Peshawar has conducted a fact finding inquiry vide Notification No.SO(Inq)1-19/2024/SO(Lit-II)/SA#391/2023/EP No. 567-2023/Niamat Ullah dated 31-01-2024 through the following inquiry committee: -
- Dr. Muhammad Iqbal Khan Additional Director BS-19 MC,
 - Mr Zahoor Khan DEO (M) Karak now Lakki Marwat &
 - Miss. Gul Raj Deputy Director E&SE

The inquiry committee submitted its report vide letter No. 1912 dated 21-03-2024 to the petitioner No. 4, wherein, the committee has concluded **that major illegalities have been made in the appointments, regularization & reinstatement of teachers in North Waziristan Shelling District and has suggested for conducting of formal inquiry into the matter. (Copies of the Notification & inquiry report are E & F)**

10. That the Respondent is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act 1974, has filed the titled appeal on mala fide intentions to legitimize/legalized a fake, forged & bogus appointment order & subsequent drawl of salaries, hence, the order dated 06-06-2023 being the result of misrepresentation, fraud & concealment of fact on the part of the appellant which is liable to be re-called in favor of the petitioners /E&SE Department in the interest of justice on the following grounds inter alia:-

ON GROUNDS

- That** the impugned order dated 06-06-2023 is the result of exceed of jurisdiction & violation of Section-5 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, wherein, it has clearly been enunciated that this learned Tribunal cannot dispose of appeals in limine without formal notice to the Respondent
- That** the Respondent has concealed material facts regarding his appointment on a fake, forged & bogus order dated 15-03-2014 against the PST (M) in BPS-12 in District North Waziristan from the ambit of this Honorable Tribunal in his main appeal as cited above on mala fide intentions & thus succeeded in obtaining an impugned order dated 06-06-2023 on fraud & concealment of material facts from the Honorable Tribunal.
- That** the whole case of the Respondent is mainly based on mala fide & concocted story for gaining illegal service benefits against the fake & bogus appointment in question in District North Waziristan in violation of the Rules in vogue already opposed by the District Accounts Officer concerned as well as the Accountant General Khyber Pakhtunkhwa Peshawar vide letter dated 07-12-2020 **attached as Annex-G.**
- That** valuable legal rights are attached with the instants case of the Petitioners which cannot be denied on the basis of order dated 06-06-2023 passed by this Honorable Tribunal on technical grounds without affording an opportunity of fair Trial to the


petitioners as mandatory under the Rules & ensured under the mandatory provision of Articles-10-A & 38E of the constitution of Islamic Republic of Pakistan 1973.


- E. *That* the instant petition is within time limitation & jurisdiction of the Honorable Service Tribunal to entertain the matter in hand having no legal bar on the grounds that huge financial rights are directly involved with the title matter, furthermore, if the orders of the like nature are implemented, then it will open a flood gate of litigation for no valid cause of action for the others in an area which is already a backward one & is facing multiple financial crises in restoring the basic infrastructure after the chronic phase of extremism & terrorism, however, this Honorable Tribunal has not considered the facts & circumstances of the case prior to the announcement of the order dated 06-06-2023 against the petitioners in the titled appeal.
- F. *That* the Respondent is a habitual litigant against the Department for no valid cause of action in terms of the afore-made submissions, hence, the order dated 06-06-2023 is liable to be re-called in favor of the petitioners in the interest of justice.

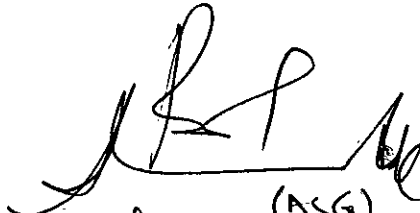
PRAYER:

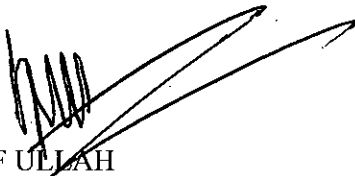
It is therefore, most humbly requested that on the acceptance of this petition under section 12 (2) CPC 1908, the order dated 06-06-2023 of this Honorable Tribunal in the above referred appeal may kindly be re-called in terms of the above made submissions in favor of the petitioners, however, it is further submitted that the operation of the subsequent orders of this Honorable Tribunal in the pending Execution Petition for the implementation of the order dated 06-06-2023 may also be graciously suspended in favor of the petitioners in the interest of justice please.

Dated: ___ / ___ 2024.


DILAWAR KHAN
District Education Officer,
(Male) North Waziristan
E&SE Education Khyber
Pakhtunkhwa Peshawar.
PETITIONERS No.2,


SAMINA ALTAF
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Petitioner No: 1)


Mr. Abdul Akram (ASG)
By MASOOD AHMAD
SECRETARY
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Petitioner No: 4)


ARIF ULLAH
District Account Officer,
North Waziristan,
E&SE Department Khyber
Pakhtunkhwa Peshawar.
Petitioner No.3

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR.

Petition No: _____/2024 in Service Appeal No.391/2023

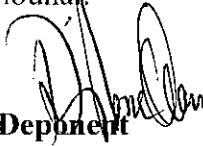
1. Director E&SE KP Peshawar,
2. District Education Officer (Male), District North Waziristan,
3. District Account Officer, District North Waziristan,
4. The Secretary E&SE Department KP Peshawar.....Petitioners.

VERSUS

Niamat Ullah, PST (BPS-12) District Education Officer (Male) North Waziristan
.....Respondent

AFFIDAVIT

I, District Education Officer, District North Waziristan do hereby solemnly affirm & declare on oath that the contents of the instant petition under 12(2) CPC 1908 against the order/Judgment dated 06-06-2023 of this Honorable Service Tribunal in the titled Service Appeal are true & correct to the best of my knowledge & belief. It is further stated on oath that the right of defense of the petitioners/E&SE Department KP Peshawar has not been struck off by this Honorable Tribunal.


Deponent

Through : **District Education Officer,**
(Male) North Waziristan
PETITIONERS No.1,2&3,
Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar.

ATTESTER



6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 391 /2022

SCANNED
KPST
PESHAWAR

Naimat Ullah

VS


EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	1-2
2.	Affidavit & appointment letterA.....	3, 4
3.	Order dated 09.01.2019	A/1	4/1
4	Order dated 07.02.2020	B	5
4.	Letter dated 10.02.2020 & 12.02.2020	C	6-7
5.	Letter date 03.03.2020	D	8
6	departmental appeal	E	9
7.	Vakalatnama	10

لفعل الذ
APPELLANT

THROUGH:


Yasir Saleem
&
Afrasiab Khan Wazir
Advocate high Court

Afrasiab

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

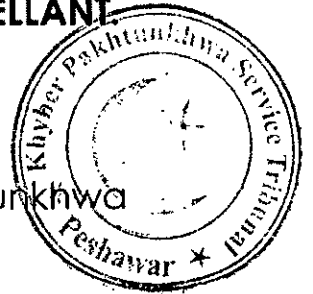
Service Appeal No. 391/2022

Diary No. 2674

Date 2-1-2023

Mr. Naimat ullah, PST (BPS-12), in district education Officer
District North Waziristan **APPELLANT**

Versus



1. Director education merged district, Khyber Pakhtunkhwa Peshawar.
2. District education officer, District North Waziristan.
3. District Account Officer, District North Waziristan.

4. *Sony B.U.S.E. Dept. CP Peshawar* **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST INACTION OF THE RESPONDENT BY NOT RELEASING SALARIES W.E.F 01.07.2019 OF THE APPELLANT AND AGAINST INACTION ON DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STIPULATED PERIOD.

Prayer:

That on acceptance of this instant service appeal of the appellant the inaction of the respondents by not releasing salaries of the appellant w.e.f 01.07.2019 till dated may very kindly be declared illegal and without lawful authority of law, and the respondents may further please be directed to release salaries of the appellant w.e.f 01.07.2019 till dated, with all back benefits. Any other remedy which august tribunal deems fit that may also be decided in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts of the appeal are as under;

ATTESTED

[Signature]
Khyber Pakhtunkhwa
Service Tribunal
Peshawar
6/15/23

1. That the appellant is working as PST (BPS-12) in the respondent department. *(Copy of appointment letter is attached as Annexure 'A')*
2. That the appellant approached respondent No.1 to kindly released our salaries while respondent No.1 vide order dated 09.01.2019 issued order to respondent No.3 to release their salaries if not terminated. *Copy of order dated 09.01.2019 is attached as annexure.....A/1*
3. That in response of order dated 09.01.2019 the respondent No.3 issued the outstanding salary released order dated 07.02.2020 after scrutiny and enquiry. Copy of the order dated 07.02.2020 is attached as annexure.....B.

Submitted to Registrar and filed.

Registrar

- 4. That on 10.02.2020 the respondent No.3 made an observation over the impugned bills which was removed by the respondent No.2 and resubmitted to respondent No.3 vide order dated 12.02.2020 which is still pending. Copy of letters are attached as annexureC.
- 5. That the Respondent No.2 sent letters date 03.03.2020 regarding the outstanding salaries but the respondent No.3 is still mum over it. Copy of letter 03.03.2020 is attached as annexure.....D.
- 6. That against the inaction of the respondents with regard to the outstanding salaries of the appellant, he also filed departmental appeal to the appellate authority which is still pending. Copy of the departmental appeal is attached as annexure.....E.
- 7. That appellant further feeling aggrieved and having no other remedy but to file this appeal on the following grounds inter alia.

ON GROUNDS:

- A. That the inaction of the respondents by not releasing salaries of the appellant w.e.f 01.07.2019 is against law, rules and norms of natural justice.
- B. That the appellant have not be treated in accordance with law and rules and as such respondents violated Article 4 and 24 of the constitution of Islamic republic of Pakistan 1973.
- C. That the action of the respondent No.3 amounts to sheer arbitrary and autocratic in nature hence against the norms of natural justice.
- D. That the conduct of respondent No.3 is not only ignoring the competent authority orders but conduct and attitude of the respondents No.3 from such inaction show something unfair means hence also violating the mandatory provision of the constitution that all Govt. departments are duty bound to strictly act in accordance with law.
- E. That its apex court decisions that salary is not bounty that can be stopped at the wishes of high ups.
- F. That the inaction of the respondents by not releasing salaries of the appellant is against Article 38(e) of the Constitution of Islamic republic of Pakistan, 1973.

ATTESTED
 [Signature]
 Secretary
 Tribunal

That the respondents are using colorful exercise of power regarding not releasing the salaries outstanding against the respondents hence this action of the respondents is unwarranted under the law.

H. That the appellant seeking indulgence of this honorable Tribunal for intervening in the matter to release immediately the outstanding salaries and clear the bill pending before the respondent No.3 without any cogent reason and the respondent No.3 has no locus standi to stop the bills being clear cut orders of the high ups and competent authority.

I. That the remaining points if any arise during the course of hearing may also be allowed.

It is therefore humbly prayed that the appeal of the appeal may very kindly be accepted as prayed for.

APPELLANT

Naimat Ullah
Naimat Ullah

THROUGH:

Y
Yasir Saleem
&

Afrasiab
Afrasiab Khan Wazir
Advocates high Court

Certificate:

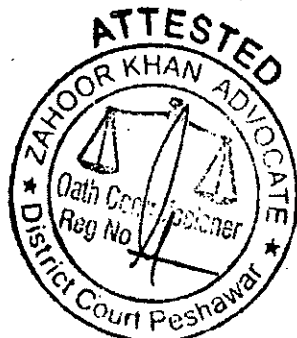
That no earlier appeal is preferred before this august tribunal.

Naimat Ullah
Deponent

Affidavit:

I Naimat Ullah S/O Aslam Khan, resident of district north waziristan, solemnly affirm and declare that the contents of this Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this August Tribunal.

Naimat Ullah
Deponent

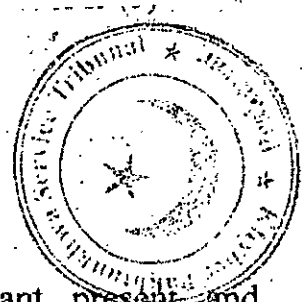


Certified to be true copy

Khyber Pakhtunkhwa
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Appeal NO = 391/2023

5



ORDER
06.06.2023

Learned counsel for the appellant present and submitted copy of letter No. 35016-21/DEO/NWTD dated 19.12.2022 and stated that in view of the said letter, the desired relief has otherwise been granted to the appellant, therefore, this appeal has outlived its utility. Disposed of accordingly. File be consigned to the record room.

ANNOUNCED
06.06.2023

(Salah-Ud-Din)
Member (Judicial)

Naeem Amin

ATTESTED

BEFORE THE COURT OF SERVICE TRIBUNAL,
PESHAWAR

Execution Petition No. 567/2023

In line with Service appeal No. 391 /2023

Niamat UllahAppellant

Versus

Director Education & others.....Respondents

INDEX

S#	Description of documents	Annexure	Page No
1	Execution petition with Affidavit		1-2
2	Copy Office Order dated 17-06-2022	"A"	3
3.	Copy of Order Dated 06-06-2023	"B"	4-5
4.	Copy of letter dated 17-12-2020	"C"	6
5.	Copy of order sheet dated 30-05-2022	"D"	7-8
6.	Wakalat Nama		9

Dated: 08-08-2023

Niamat
Appellant

Through

Y *M. Z*
Yasir Saleem & Mir Zaman

Advocates High Court

Peshawar

12

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Execution petition No 57/2023
In service appeal No 391/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6935

Dated 09/08/23

Naimat Ullah PTC (BPS-12) in District Education Officer
District North Waziristan.....Appellant

Versus

1. Director Education Merged Districts Khyber Pakhtunkhwa
Peshawar
2. District Education Officer, District North Waziristan
3. District account officer, District North Waziristan
4. The Secretary E&SED Khyber Pakhtunkhwa.



APPLICATION FOR THE IMPLEMENTATION OF
ORDER AND JUDGMENT DATED 19.07.2022 IN
ALL ABOVE CONNECTED SERVICE APPEALS.

Respectfully Sheweth:

1. That above titled service appeal was pending adjudication before this Hon'ble Tribunal and was fixed for hearing on 06-06-2023
2. That on the date fixed representative of the respondents appeared and produce copy of office order dated 06-06-2022 vide which directions were issued with regard to the payment of outstanding salaries of the applicants. **(Copy of office order dated 06-06-2022 is attached as annexure A).**
3. That in the light of new development the appeal was disposed of accordingly vide order dated 06-06-2023. **(Copies of order dated 06-06-2023 of the applicants is attached as annexure B).**
4. That there after the applicant approached the respondents and requested for release of their outstanding salaries. In response to the request the department released only the salaries of Abid Ullah Service Appeal No. 742/023 & Asad Ullah Service Appeal No. 744/023 and their outstanding salaries have been issued. However the rest of appellants/ the present applicant is still struggling for release of their salaries and outstanding bills.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

5. That it is pertinent to mention here that the pay bills of the applicant is prepared but respondent No. 03 is creating hurdles in way of release of salaries. In this regard the Accountant General KP Peshawar also issue direction to the respondent No. 03 for release of salaries vide letter dated 07-12-2020 however he is not even honoring the order of this Honble Tribunal nor letter dated 07.12.2020. **(Copy of letter dated 07.12.2020 is attached as annexure C).**

6. That it is pertinent to mention here that an identical nature matter an execution No. 15/2020 has been decided by this Hon'ble Tribunal wherein salaries of the employees! Petitioners are allowed with the direction to respondent No. 02 and 03 therein that salaries of the petitioners according to their entitlement may be released along with outstanding arrears if any within 30 days of this order. **(Copy of order sheet dated 30-05-2022 is attached as annexure D).**

7. That as per the order of this Hon'ble Tribunal dated 06-06-2023 respondents are bound to release the salaries as well as outstanding bills. However they have not yet implemented the same in the letter and spirit.

It is, therefore, most humbly prayed that on acceptance of this application, the order dated 06-06-2023 may please be implemented and respondent No. 03 (DAO) may please be directed to pass and release the monthly salaries as well as the arrears / outstanding pay bills.

Wakil
Applicants

Date: 05-08-2023

Through

[Signature]
Yasir Saleem & Mir Zaman
Advocates, High Court
Peshawar

AFFIDAVIT

I, **Yasir Saleem Advocate** (as per instructions of my client), is solemnly affirm and declare that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal

Certified to be true copy

[Signature]
M. AMINER
Khatim Paktikhwa
Justice Tribunal
Peshawar

[Signature]
DEPONENT

Date of Presentation of Application 07/15/23
Number of Words 2-11
Copying Fee 15/-
Urgent 8/15
Total 15/-
Name of Yasir Saleem
Date of Completion 07/18/23
Date of Delivery of Copy 07/18/23



09 AUG 2023

OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN**AGENCY****Appointment order**

As per recommendation of the departmental selection committee the following Male/Fe-male PST teachers are hereby appointed against the vacant posts with immediate effect from the date of taking over charge in the best interest of public.

1. Mr. Niamat Ullah PST GPS Bare kot.
2. Mr. Asad Ullah PST GPS Data Khel.
3. Mr. Ghulam Rasool PST GPS inayat Khan kot.
4. Mr. Zahid Ullah PST GPS Zindai Kot.
5. Mr. Abid Ullah PST GPS Salman Kot.
6. Mr. Sher Abbas Khan PST GPS Mami Rogha Manzar Khel.
7. Mr. Inam Ullah PST GPS Dari Wasta.
8. Mr. Naseer Ud Din PST GPS M. Aslam Kot.
9. Mst. Salma PST GGPS Akhtar Nawaz Kot.
10. Mst. Safia PST GGPS Said Rasool Kot.
11. Mst. Saima PST GGPS Siraj Ud Din Kot.
12. Mst. Zainab PST GGPS Muhammad AMin Kot.
13. Mr. Israr Ullah PST GPS Maaz Alam Kot.
14. Mr. Abdul Tawab PST GPS Hassan Shah Kot.


Agency Education Officer
North Waziristan Agency

Endst No. 386-91/AEO/NWA

Dated: 15/3/2014

Copy to:

1. Director Education FATA, FATA Secretariat Peshawar.
2. Political agent North Waziristan Agency.
3. Agency account Officer NWA.
4. AAEO circle Concerned.
5. Candidates concerned.


Agency Education Officer
North Waziristan Agency

Attested


ATETSTED





Annex - E

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Phone No.091-9210624 Email: so.inquiries.ense@gmail.com

28/15
DB
Sed

Dated Peshawar the 31st January, 2024

NOTIFICATION

No.SO(Ing)1-19/2024/SO(Lit-II)SA No.391/2023/EP No.567-2023/Niamat Ullah

The competent authority has been pleased to constitute the following inquiry committee to conduct fact finding inquiry into the Service Appeal No.391/2023 Niamat Ullah PST, NWTD and similar Service appeals (Flag "A"):-

- i. Dr. Muhammad Iqbal, Additional Director (Estab), Directorate of E&SE
- ii. Mr. Zahoor Khan, District Office Officer (M), Karak
- iii. Miss Gulraj, Deputy Director, Directorate of E&SE ✓

ToRs

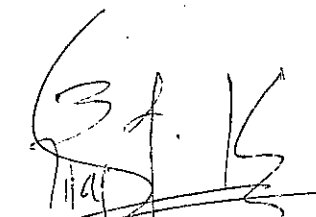
- a. To thoroughly check the appointment process of all the appellants, like advertisement, final merit list, DSC Minutes, first appointment orders, schools where duties performed and their seniority lists on yearly basis.
 - b. Fix the role of Mr. Akhtar Nawaz, SS BPS-17 and others in processing these cases (Flags "B" D3)
 - c. Fix the responsibility upon the officers / officials involved in the process.
02. The inquiry committee shall submit report within 03 weeks, positivey.
03. Copy of relevant record is attached herewith.

SECRETARY E&SE DEPARTMENT

Endst: of E ren No. & Date:

Copy of the above is forwarded to:

- 1. Director, E&SE, Peshawar
- 2. Dr. Muhammad Iqbal, Additional Director (Estab), Directorate of E&SE/Inquiry Office
- 3. Mr. Zahoor Khan, District Office Officer (M), Karak / Inquiry Officer
- 4. Miss Gulraj, Deputy Director, Directorate of E&SE / Inquiry Officer
- 5. Section Officer (Lit-II), E&SE Department
- 6. PS to Secretary, E&SE Department
- 7. PA to Additional Secretary (General), E&SE Department
- 8. PA to Additional Secretary (Monitoring), E&SE Department
- 9. PA to Deputy Secretary (Admn), E&SE Department.


(Bilal Khan)
Section Officer (Inquiries)

DD (PA/D) ✓
ADD (B/I) ✓
21/2/24 ✓

1100
07-02-24

SI
2/2/24



Annex-2

16

(2/1/03)

(1/1/03)

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

No. 1912 /F.No.

Dated the Peshawar 21/03/2024

To

The Section Officer (Inquiries)
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

Subject: **FACT FINDING INQUIRY INTO THE SERVICE APPEAL NO. 391/2023 NIAMAT ULLAH PST, NWTD AND SIMILAR SERVICE APPEALS**

I am to refer to your office Notification No. SO (Inq) 1-19/2024/SO (Lit-II)SA No. 391/2023/EP No. 567-2023/Niamat Ullah dated 31-01-2024 on the subject cited above and to submit herewith the inquiry report along with its annexures and copies of relevant record (14 number of original books) for further necessary action please.

o/c

(Signature)
Dr. Iqbal Khan (Inquiry Officer)
Additional Director (Estab-Male)
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 1913-18 /
Copy forwarded to:

Dated: ___/___/2024

1. Section Officer (Lit-II) E&SE Department.
2. PS to Secretary, E&SE Department.
3. P.A to Additional Secretary (General), E&SE Department.
4. P.A to Additional Secretary (Monitoring), E&SE Department.
5. P.A to Deputy Secretary (Admn), E&SE Department.
6. P.A to Director, Elementary & Secondary Education Khyber Pakhtunkhwa.

o/c

(Signature)
Dr. Iqbal Khan (Inquiry Officer)
Additional Director (Estab-Male)
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar



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

No. 1912 /F.No.

Dated the Peshawar 21/03 /2024

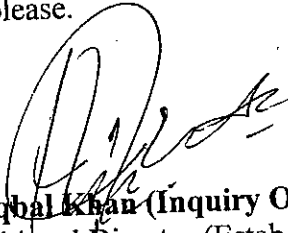
To

The Section Officer (Inquiries) — 21/3 Syed Iram Ullah,
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

Subject:

**FACT FINDING INQUIRY INTO THE SERVICE APPEAL NO. 391/2023 NIAMAT
ULLAH PST, NWTD AND SIMILAR SERVICE APPEALS**


I am to refer to your office Notification No. SO (Inq) 1-19/2024/SO (Lit-II)SA No. 391/2023/EP No. 567-2023/Niamat Ullah dated 31-01-2024 on the subject cited above and to submit herewith the inquiry report along with its annexures and copies of relevant record (14 number of original books) for further necessary action please.


Dr. Iqbal Khan (Inquiry Officer)
Additional Director (Estab-Male)
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. _____ /
Copy forwarded to:

Dated: _____ / _____ 2024

1. Section Officer (Lit-II) E&SE Department.
2. PS to Secretary, E&SE Department.
3. P.A to Additional Secretary (General), E&SE Department.
4. P.A to Additional Secretary (Monitoring), E&SE Department.
5. P.A to Deputy Secretary (Admn), E&SE Department.
6. P.A to Director, Elementary & Secondary Education Khyber Pakhtunkhwa.


Dr. Iqbal Khan (Inquiry Officer)
Additional Director (Estab-Male)
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

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**REPORT REGARDING FACTS FINDING INQUIRY INTO THE SERVICE APPEAL NO.
391/2023 NIAMAT ULLAH, PST NWTD AND SIMILAR SERVICE APPEALS**

1. AUTHORITY

The undersigned Committee was authorized by the Secretary Elementary & Secondary Education Department Government of Khyber Pakhtunkhwa vide Notification No. SO (Inq)1-19/2024/SO (Lit) SA No. 391/2023 EP No. 567-2023/ Niamatullah dated 31-01-2024 (**Annexure-A**) to conduct fact finding inquiry into the service appeal No. 391/2023 Niamatullah, PST NWTD and similar service appeals with the following TORs:

- a) To thoroughly check the appointment process of all the appellants, like advertisement, final merit list, DSC Minutes, first appointment orders, schools where duties performed and their seniority lists on yearly basis.
- b) Fix the role of Mr. Akhtar Nawaz, SS BPS-17 and others in processing these cases.
- c) Fix the responsibility upon the officers/ officials involved in the process.

2. PROCEDURE

- i. A letter bearing No. 9527-31 dated 01-02-2024 was issued to DEO (Male) North Waziristan (**Annexure-B**) asking him to inform Mr. Akhtar Nawaz, SS (BS-17) to visit the inquiry committee on 06-02-2024 (Tuesday) to record his statement accordingly but he failed to attend the office of the chairman of the inquiry committee on the date. Then, another letter bearing No. 523 dated 09-02-2024 (**Annexure-C**) was issued wherein, the said SS (BS-17) was directed to visit the inquiry committee on 12-02-2024 (Monday) to proceed further into the matter but he requested to be appeared before the inquiry committee on 26-02-2024 (**Annexure-D**) however, he attended the office of the inquiry officer(s) on 19-02-2024 and submitted his written statement wherein, he stated that he has no concern with the aforementioned service appeals and further told that he was performing his duties as Head Master at GHS Darpa Khel District North Waziristan (**Annexure-E & F**).
- ii. A letter bearing No. 9624-25 dated 01-02-2024 addressed to DEO (Male & Female) North Waziristan was issued wherein they were directed to visit and provide the record/ details regarding the inquiry, which they did but incomplete (**Annexure G**).
- iii. In order to provide complete information as per TOR (a) of the Notification dated 31-01-2024, another letter having No. 2646-47 dated 20-02-2024 was issued (**Annexure-H**). In response to the letter, DEO (Female) North Waziristan submitted the information vide letter No. 15 dated 21-02-2024 (**Annexure-I**) with the following details as mentioned in **Table No. 1**:

Table No. 1

S.N	Name Of Teacher with Desig/BPS	School	Advertisement No	Final Merit List	Dsc Minutes	First Appointment Order	School Where Duty Performed	Seniority list Yearly Basis
1	Hasina Arif PST Bps-12	FCS Jahangir Kot	Not Available	Not Available	Not Available	Yes	GGPS Nasir ud Din Kot	Not Available
2	Saila PST Bps-12	FCS Jahangir Kot	Not Available	Not Available	Not Available	Yes	GGPS Wali Zuman Kot	Not Available
3	Saima PST Bps-12	FCS Akhtar Nawaz Kot	Not Available	Not Available	Not Available	Yes	GGPS Gul rat Kot	Not Available
4	Ambrin PST Bps-12	FCS Masroor Kot	Not Available	Not Available	Not Available	Yes	GGPS Shahzar Khan Kot	Not Available

5	Mehnaz PST Bps-12	FCS Rahim Kot	Not Available	Not Available	Not Available	Yes	GGPS Guldad Kot	Not Available
6	Kaloom PST Bps-12	FCS Rahim Kot	Not Available	Not Available	Not Available	Yes	GGPS Shah Zar Khan Kot	Not Available
7	Razia PST Bps-12	FCS Naeem Kot	Not Available	Not Available	Not Available	Yes	GGPS Qutab Khan Kot	Not Available
8	Nayar Sultan PST Bps-12	FCS Naeem Kot	Not Available	Not Available	Not Available	Yes	GGPS Danger Kot	Not Available
9	Rozina PST Bps-12	FCS Naeem Kot	Not Available	Not Available	Not Available	Yes	GGPS Dost Muhammad Kot	Not Available
10	Nazia Bibi PST Bps-12	FCS Salman Kot	Not Available	Not Available	Not Available	Yes	GGPS Qutab Khan Kot	Not Available
11	Saima Burhan Ud Din PST Bps-12	FCS Masroor Kot	Not Available	Not Available	Not Available	Yes	GGPS Akhtar Zuman Kot	Not Available
12	Arifa Manzoor PST Bps-12	FCS Taimoor Kot	Not Available	Not Available	Not Available	Yes	GGPS Akhtar Zuman Kot	Not Available
13	Abida Ijaz PST Bps-12	FCS Nawoob Kot	Not Available	Not Available	Not Available	Yes	GGPS Guldad Kot	Not Available
14	Saira Khaton PST Bps-12	FCS Naeem Kot	Not Available	Not Available	Not Available	Yes	GGPS RAhmat Ullah Kot	Not Available
15	Uzma PST Bps-12	FCS AKHTAR NAWAZ KOT	Not Available	Not Available	Not Available	Yes	GGPS Akhtar Nawaz Kot	Not Available
16	Asifa Zubair PST Bps-12	FCS Nawoob Kot	Not Available	Not Available	Not Available	Yes	GGPS Pir Muhammad Salam Kot	Not Available
17	Ruqia Khan PST Bps-12	FCS Mabroor Kot	Not Available	Not Available	Not Available	Yes	GGPS Faqir Matari Kot	Not Available
18	Safia PST Bps-12	FCS Masroor Kot	Not Available	Not Available	Not Available	Yes	GGPS Mirza Gul Kot	Not Available
19	Zainab PST Bps-12	GGPS Akhtar Nawaz Kot Danday Darpa khel	Not Available	Not Available	Not Available	Yes	GGPS Akhtar Nawaz Kot Danday Darpa khel	Not Available
20	Mrs Masoom PST Bps-12	GGPS Akhtar Nawaz Kot	Not Available	Not Available	Not Available	Yes	GGPS Akhtar Nawaz Kot	Not Available
21	Kalnoon PST Bps-12	GGPS Rahmat	Not Available	Not Available	Not Available	Yes	GGPS Rahmat	Not Available

		Ullah Kot Datta Khel					Ullah Kot Datta Khel	
22	Laiba Ijaz PST Bps- 12	GGPS Noor Gul Kot	Not Available	Not Available	Not Available	Yes	GGPS Noor Gul Kot	Not Available
23	Shamila PST Bps- 12	GGPS Rasool Khan Kot	Not Available	Not Available	Not Available	Yes	GGPS Rasool Khan Kot	Not Available
24	Rehana Bibi PST Bps-12	GGPS Nasib Khan Kot	Not Available	Not Available	Not Available	Yes	GGPS Nasib Khan Kot	Not Available
25	Imrana PST Bps- 12	GGPS Gul Bat Kot	Not Available	Not Available	Not Available	Yes	GGPS Gul Bat Kot	Not Available
26	Bibi Gul PST Bps- 12	GGPS Barak Kot	Not Available	Not Available	Not Available	Yes	GGPS Barak Kot	Not Available
27	Nilma Masood PST Bps- 12	GGPS Mir Ghulam Kot	Not Available	Not Available	Not Available	Yes	GGPS Mir Ghulam Kot	Not Available
28	Abida Khan PST Bps-12	GGPS Noor Gul Kot	Not Available	Not Available	Not Available	Yes	GGPS Noor Gul Kot	Not Available
29	Mrs Kalsoom PST Bps- 12	GGPS Akbar Khan Kot	Not Available	Not Available	Not Available	Yes	GGPS Akbar Khan Kot	Not Available
30	Fatima Masood PST Bps- 12	GGPS Shah Mehmood kot Garyum	Not Available	Not Available	Not Available	Yes	GGPS Shah Mehmood kot Garyum	Not Available
31	Shamim PST Bps- 12	GGPS Siraj Ud Din Kot Miranshah	Not Available	Not Available	Not Available	Yes	GGPS Siraj Ud Din Kot Miranshah	Not Available
32	Anila Essam PST Bps-12	GGPS Noushad Ali Kot Hurmaz	Not Available	Not Available	Not Available	Yes	GGPS Noushad Ali Kot Hurmaz	Not Available
33	Sumbal Laila Gul PST Bps12	GGPS Mir Ghulam Kot	Not Available	Not Available	Not Available	Yes	GGPS Mir Ghulam Kot	Not Available
34	Mrs Noorin PTC Bps- 12	GGPS Atta Muhammad Kot	Not Available	Not Available	Not Available	Yes	GGPS Atta Muhammad Kot	Not Available
35	Ambrin Bano PST Bps-12	GGPS Birmula Kot	Not Available	Not Available	Not Available	Yes	GGPS Birmula Kot	Not Available
36	Amber Hanif PST Bps-12	GGPS Ghulam Sher Kot	Not Available	Not Available	Not Available	Yes	GGPS Ghulam Sher Kot	Not Available
37	Salma Naz PST Bps- 12	GGPS Aziz Muhammad Kot	Not Available	Not Available	Not Available	Yes	GGPS Aziz Muhammad Kot	Not Available
38	Mrs Mukhtar Zada PSt Bps-12	GGPS Alif Khan Kot	Not Available	Not Available	Not Available	Yes	GGPS Alif Khan Kot	Not Available

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39	Mrs Nargis Bibi Pst Bps-12	GGPS Rahmat Ullah Kot	Not Available	Not Available	Not Available	Yes	GGPS Rahmat Ullah Kot	Not Available
40	Mrs Amra Haider	GGPS NASib Khan Kot Darpa Khel	Not Available	Not Available	Not Available	Yes	GGPS NASib Khan Kot Darpa Khel	Not Available
41	Sawal Haider Pst Bps-12	GGPS NASib Khan Kot Darpa Khel	Not Available	Not Available	Not Available	Yes	GGPS NASib Khan Kot Darpa Khel	Not Available
42	Mrs Sumira PST Bps-12	GGPS Janat Mir Kot	Not Available	Not Available	Not Available	Yes	GGPS Janat Mir Kot	Not Available

iv. DEO (M) North Waziristan submitted the required information vide letter No. 4639 dated 22-02-2024 (Annexure-J) with the following details as mentioned in Table No. 2:

Table No. 2

S.No	Name of teacher with Desig:	School	Advertisement No & Date.	Final Merit List	DSC Minutes	First appointment	School where duty performed	Seniority list yearly basis having name of teacher.
01	Aftab Khan PST	GPS Qatab khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
02	Sabat Rehman PST	GPS Gukzar khan kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
03	Nati Ullah Shah PST	GPS Miranshah Village	Not available	Not available	Not available	Original record not available.	No record available	No record available
04	Syed Ahmad Khan PST	GPS Khonam Shah kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
05	Taj Nawaz Khan PST	GPS Khonam Shah kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
06	Rahid Ullah PST	PSG Bara Khozai	Not available	Not available	Not available	Original record not available.	No record available	No record available
07	Ghulam Rasool PST	GPS Lawrga	Not available	Not available	Not available	Original record not available.	No record available	No record available
08	Eid Nazar PST	GPS Nazar kot	Not available	Not available	Not available	Original record not available.	No record available	No record available

09	Sadiq Ur Rehman PST	GPS Imran Ullah kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
10	Muhammad Ullah PST	GPS Eidak	Not available	Not available	Not available	Original record not available.	No record available	No record available
11	Zafran Ullah PST	GPS Assar Datta khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
12	Naseer Ullah PST	GPS Khaddi	Not available	Not available	Not available	Original record not available.	No record available	No record available
13	Suraj Ud Din PST	GPS Chashma khaddar khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
14	Israr Ahmad PST	GPS Rimal kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
15	Muhammad Nek Shah PST	GPS Mashar kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
16	Rahmat Ullah TT	GPS Razmak	Not available	Not available	Not available	Original record not available.	No record available	No record available
17	Mehmood khan CT	GPS Chashma khaddar khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
18	Abdul Majid PST	GPS Quali khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
19	Abid Ullah PST	DPS Mir Bahadar kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
20	Mohab Ullah PST	GPS Datta khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
21	Manzoor Ahmad PST	GPS Khan Zada kot Tappi	Not available	Not available	Not available	Original record not available.	No record available	No record available
22	Atta Ur Rehman PST	GPS Datta khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
23	Barkat Ullah PST	GPS Said Malook kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
24	Ijaz Muhammad PST	GPS Sarfaraz kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
25	Rahim Ullah PST	GPS Sarfaraz kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
26	Sher Zaman PST	GPS Gub kot	Not available	Not available	Not available	Original record not available.	No record available	No record available

27	Andullah Noor PST	GPS	Not available	Not available	Not available	Original record not available.	No record available	No record available
28	Abid Ullah PST	GPS	Not available	Not available	Not available	Original record not available.	No record available	No record available
29	Iftakhar Ud Din.	GPS	Not available	Not available	Not available	Original record not available.	No record available	No record available
30	Mati Ullah PST	GPS Muhammad Aslam kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
31	Hayat Ullah PST	GPS Muhammad Aslam kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
32	Asmat Ullah PST	GPS Salman kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
33	Umer Ali TT	GPS Khwajwani	Not available	Not available	Not available	Original record not available.	No record available	No record available
34	Ihsan Ahmad CT	GMS Khwajawani	Not available	Not available	Not available	Original record not available.	No record available	No record available
35	Sami Ullah TT	GPS Zindai	Not available	Not available	Not available	Original record not available.	No record available	No record available
36	Hadayat Ullah shah PTC	GPS Gulshin Kot Spulga	Not available	Not available	Not available	Original record not available.	No record available	No record available
37	Arif Ullah PST	GPS Wreshmin Jan	Not available	Not available	Not available	Original record not available.	No record available	No record available
38	Sabil Ur Rehman PST	GPS Gul Shah Jan Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
39	Sher Zad Ullah PST	GPS Murad Ali	Not available	Not available	Not available	Original record not available.	No record available	No record available
40	Abdul Wahid PST	GPS Mubarak Shahi	Not available	Not available	Not available	Original record not available.	No record available	No record available
41	Syed Asad Ullah PST	GPS Muhammad Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
42	Syed Noor Shah PST	GPS Akbar Khan Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available

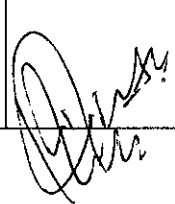
[Handwritten signature]

43	Khalid Rehman PST	GPS Aslam Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
44	Gohar Ullah PST	GPS Dabak Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
45	Javid PST	GPS Sher Bahader Kot Spulga	Not available	Not available	Not available	Original record not available.	No record available	No record available
46	Javid Ullah PST	GPS Gul Khandan Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
47	Shahzeb PST	GPS Dabak Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
48	Atif Ullah PST	GPS Hameed Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
49	Gohar Hussain PST	GPS Zar Mar Jan Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
50	Muhammad Ali PST	GPS Land Said Abad	Not available	Not available	Not available	Original record not available.	No record available	No record available
51	Naseer Ullah PST	GPS Hurmaz	Not available	Not available	Not available	Original record not available.	No record available	No record available
52	Inam Ullah PST	GPS Kharseen	Not available	Not available	Not available	Original record not available.	No record available	No record available
53	Abdul Tawab PST	GPS Doga Macha	Not available	Not available	Not available	Original record not available.	No record available	No record available
54	Asad Ullah PST	GPS Nawar Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
55	Muhammad Ilyas PST	GPS Rimal Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
56	Mohab Ullah CT	GMS Gul Shin Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
57	Ijaz Ur Rehman PST	GPS Khair Killa	Not available	Not available	Not available	Original record not available.	No record available	No record available
58	Javid Khan PST	GPS Doga Macha	Not available	Not available	Not available	Original record not available.	No record available	No record available
59	Inam Ullah PST	GPS Janat Mir Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available





60	Niamat Ullah PST	GPS Khunam shah	Not available	Not available	Not available	Original record not available.	No record available	No record available
61	Sanobar Khan PST	GPS Sher Gul Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
62	Qismat Ullah PST	GPS Maleez Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
63	Wasim Ullah PST	GPS Abdul Salam Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
64	Ghufran Nawaz PST	GPS Gul Sharif Khan Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
65	Zafar Islam PST	GPS Abdullah Khan Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
66	Manzoor Ahmad PST	GPS Mamiz Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
67	Muhammad Mamoor PST	GPS Dewgar Saidgi	Not available	Not available	Not available	Original record not available.	No record available	No record available
68	Muftah Ud Din PST	GPS Taj Muhammad Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
69	Naqib Ur Rehman PST	GPS Gul Khandan Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
70	Abadul Samad PST	GPS Jahadaraz Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
71	Khan Nawaz Khan	GPS Dawal Din Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
72	Amar Ullah PST	GPS Mir Bahader Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
73	Muhammad Faizan PST	GPS Nadim kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
74	Hazrat Zaman PST	GPS Mir Sahib khan kot	Not available	Not available	Not available	Original record not available.	No record available	No record available



75	Muhammad Rauf CT	GMS Mashar kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
76	Inshaullah PST	GPS Issori	Not available	Not available	Not available	Original record not available.	No record available	No record available
77	Sarfaraz Khan PST	GPS Bara khozai	Not available	Not available	Not available	Original record not available.	No record available	No record available
78	Noor Zahid PST	GPS Tabi Tool khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
79	Israr Ahmad PST	GPS Gagali	Not available	Not available	Not available	Original record not available.	No record available	No record available
80	Haider Ali PST	GPS Mamadi	Not available	Not available	Not available	Original record not available.	No record available	No record available
81	Habib Ullah PST	GPS Mamadi	Not available	Not available	Not available	Original record not available.	No record available	No record available
82	Abdul Hakim PST	GPS Nadeem kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
83	Muhammad Abbas PST	GPS Mama killa	Not available	Not available	Not available	Original record not available.	No record available	No record available
84	Raza Ullah TT	GPS Gagali	Not available	Not available	Not available	Original record not available.	No record available	No record available
85	Muhammad Hazoor TT	GPS Boya	Not available	Not available	Not available	Original record not available.	No record available	No record available
86	Muhammad Kabir PST	GPS Mir Shahid Ullah Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
87	Qismat Ullah PST	GPS Ghazlama	Not available	Not available	Not available	Original record not available.	No record available	No record available
88	Din Muhammad TT	GPS Mir Salam Kot Spinwam	Not available	Not available	Not available	Original record not available.	No record available	No record available
89	Abdul Haq CT	GHS Mir salam Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
90	Israr Ullah TT	GPS Spinwam	Not available	Not available	Not available	Original record not available.	No record available	No record available
91	Muhammad Imran PST	GPS Raghzi killa	Not available	Not available	Not available	Original record not available.	No record available	No record available
92	Naid Ullah PST	GPS Lawarga	Not available	Not available	Not available	Original record not available.	No record available	No record available

93	Asad Ullah PST	GPS Mir Shahid Ullah Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
94	Muhammad Sijad TT	GPS Naurak	Not available	Not available	Not available	Original record not available.	No record available	No record available
95	Naimat Ullah TT	GPS Mukaram Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
96	Rashid Ullah TT	GPS Jan Muhammad Kot Spulga	Not available	Not available	Not available	Original record not available.	No record available	No record available
97	Mazhar ullah TT	GPS Rahim Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
98	Sher Muhammad Din TT	GPS Mukaram kot	Not available	Not available	Not available	Original record not available.	No record available	No record available
99	Rashid Ullah TT	GPS Ahmad khel	Not available	Not available	Not available	Original record not available.	No record available	No record available
100	Khalil Ur Rehman CT	GHS Razmak Camp	Not available	Not available	Not available	Original record not available.	No record available	No record available
101	Gul Ali Khan PST	GPS Samar Gul Kot	Not available	Not available	Not available	Original record not available.	No record available	No record available

Data in Table No. 1 and 2 reflect that there were few teachers which were not mentioned by both DEOs as provided to them in the lists (Annexure-K & L), the details of these teachers are given below in Table No. 3:

Table No. 3

S #	Name & Designation	Service appeal No.	Serial No.
1.	Mst Sadia, PST (BS-12)	1202/2022	
2.	Name not clear in service appeal record, PST (BS-12)	277/2006 in Execution Petition No. 8/2020	Sr. No 09 in Book-2
3.	Mst Ayesha, PTC (BS-12)	Service appeal No. 1818/2023	
4.	Mst Narges Begum, PTC	Service Appeal No. 230/2006	Sr. No 08 in Book-2
5.	Mst. Zaib un Nisa, PTC	Service Appeal No. 1708/2022	
6.	Mst. Nasreen Shahee, PST (BS-12)	Service Appeal No. 1208/2023	Sr. No 03 in Book-2
7.	Mst. Attia Kiran, PST (BS-12)	Service Appeal No. 1205/2023	Sr. No 04 in Book-1

8.	Mst. Taskeen, PST (BS-12)	Service Appeal No. 1201/2023	Sr. No 13 in Book-2
9.	Mst. Samina, PST (BS-12)	Service Appeal No. 1194/2023	
10.	Mst. Rokhia Begum, PST (BS-12)	Service Appeal No. 1200/2023	
11.	Mst. Noreen Qayoom, PST (BS-12)	Service Appeal No. 1578/2023	
12.	Mst. Fozia Rahim, TT (BS-12)	Service Appeal No. 1587/2023	
13.	Mst. Krishma, PTC GGPS Masher Kot		
14.	Mst. Noorin, PTC GGPS Ata Muhammad kot		
15.	Mst. Sanobia, PTC GGPS Muhammad ijaz		
16.	Mst. Amber Khanif, GGPS Ghulam Sher Khan Kot		
17.	Mst. Muqadas, PTC GGPS Zar Muhammad		
18.	Mst. Hazrat Memona, PTC GGPS Siraj ud Din		
19.	Mst. Ayesha Ghulam Qadir, PTC GGPS Rahmatullah Kot		
20.	Mst. Noor Zubaida, PTC GGPS Izar Kas		
21.	Mst. Sulma, TT GGPS Abdullah Jan Kot		
22.	Mst. Fozia Rahim, TT GGPS Said Rasool Kot		
23.	Mst. Fozia Sawab, PTC GGPS Sher dad kot		
24.	Mst. Nargas, PTC GGPS Farooq Khan Kot		
25.	Mst. Mst. Aqila, PTC GGPS Zer Muhammad Kot		

Data in the **Table No. 3** shows that the teachers mentioned in the Table are suspicious and have no record regarding their appointments.

- v. Deputy Director (P&D) NMDs was called in person and directed to check the record of the appellant/ teachers in the PC-1's regarding appointments of community School teachers which they did and submitted a certificate duly signed by Assistant Director (P&D) and counter signed by Deputy Director (P&D) (NMDs) wherein they stated that no appointee teachers were found in the PC-1 regarding North Waziristan except Mr. Abidullah, PST at serial No. 28 of the list dated 08-11-2023. (Copies of the certificate and PC-1 attached as **(Annexure-M&N)**). However, the name of the mentioned teacher could not be verified having no father name/ CNIC etc.
- vi. Photocopies of the appointment orders, re-instatement orders and regularization orders received from the record provided by DEO Male & Female North Waziristan **(Annexure- O)**

3. FINDINGS

Following findings are drawn from the procedure adopted in the inquiry:

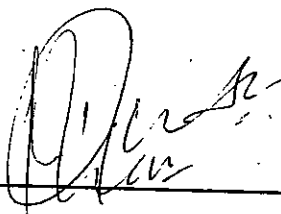
- i. Neither original nor photocopy of the Advertisement No, Final Merit List, Dsc Minutes, School Where Duty Performed and Seniority lists Yearly Basis were found, however photocopies of the few Appointment Orders, regularization orders and re-instatement orders were found (Table No. 1 & 2).
- ii. Few suspicious and un-verified teachers were found during the inquiry process (Table No.3).
- iii. No evidences were found regarding the involvement of Mr. Akhtar Nawaz, SS (BPS-17) and others in processing these cases because he had no role in the appointment of these teachers.

4. CONCLUSION


The committee concludes that major irregularities have been made in the appointments, regularization and re-instatement of teachers in North Waziristan Tribal District and a formal inquiry may be conducted. It is further concluded that the following Agency Education Officers (AEO) and District Education Officers (DEO) are responsible in this unwanted/ illegal activities:

- i. Mir Zali Khan, AEO (Retired)
- ii. Gul Nawaz Khan, AEO (Died)
- iii. Younas Ali Shan, AEO (Retired)
- iv. Gul Sayad Khan, AEO (Retired)
- v. Saeed Gul, DEO (Retired)
- vi. Saifullah Khan, DEO (Retired)
- vii. Muhib ur Rehman, DEO (Serving & OSD)
- viii. Dilawar Khan, DEO (Serving)

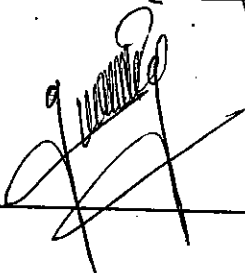
1. **Dr. Iqbal Khan**
 (Additional Director-Estab)
 Directorate of E&SE Peshawar



2. **Mr. Zahoor Khan**
 District Education Officer (M) Karak



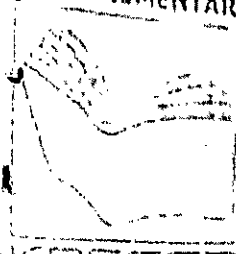
3. **Miss. Gul Raj Khan**
 Deputy Director
 Directorate of E&SE Peshawar



AW-CT

(28) 30

PRINCIPAL SECONDARY EDUCATION DEPARTMENT, GOVERNMENT OF KHYBER PAKHTUNKHWA



Office of the
DISTRICT EDUCATION OFFICER (M)
District North Waziristan, Miranshah

KPESSED

Tel: 0928 - 313040

No: 2458/DEO(M)/DHW

Email: deomale@vtd@gmail.com

Dated: 11/11/2023

To
The District Accounts Officer,
North Waziristan.

Subject: FAKE/BOGUS SIGNATURES.


It brought in to your kind notice and information that during my tenure, some Court Cases along with implementation letters from Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar as well as contempt of court have been forwarded by various candidates i.e. TTs, CTs and PSTs and also shared with District Accounts Office too for consideration as per policy in vogue. Various correspondences have also been made with your good office (Record of these letters is also available in both offices). This actual status and claims have also been shared with each others through various letters.

It is pertinent to mention over here that the undersigned have been suspended by the Secretary, Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar w.e.f. 18/11/2023 and as per authentic sources my fake/bogus signatures have been put by someone to honour various more claims.

Respect Sir, Court Cases, COCs and implementation letters may be obtained from competent authority while honouring any case.

In a nut shell, if any irregularities occur in future in violation of accounts and finance rules and regulation as well as recruitment rules, then I may be not held responsible for the consequences please.

mesko
D
M


(MUHEEB UR REHMAN)
DISTRICT EDUCATION OFFICER
(MALE) NORTH WAZIRISTAN



Annex- *[Handwritten initials]*
Office of the

Accountant General

Khyber Pakhtunkhwa Peshawar

Phone: 091 9211250-53

[Handwritten number 4]

[Handwritten number 29]

[Handwritten number 31]

[Handwritten letter M]

No.H-24 (89)/Miran Shah/Vol-II/1642-43
To

Dated 7.12.2020

✓
District Account Officer,
Miran Shah (North Waziristan).

Subject: REINSTATEMENT OF SALARIES.

The undersigned is directed to enclose a self explanatory complaint received from Mrs. Hanifa Bibi and Muhammad Younas & others on the subject cited above and to state that the issue in hand be checked and resolved immediately as per rules and in light of the Khyber Pakhtunkhwa Service Tribunal orders.

2. Moreover, you were asked vide this office letter No. H-24 (89)/Miran Shah/Vol-II/902 (copy enclosed) that cost center PR0049 pertains to Additional Accountant General Pakistan Revenue (Sub-Office) Peshawar used for Erstwhile FATA. Against the old cost center PR-8129 (allotted by the Government of Khyber Pakhtunkhwa Finance Department), through which 38 employees are drawing their salaries up to 30.11.2020, the same may also be elucidated accordingly please.

3. In this regard, report of the same may be submitted to this office for perusal of the competent authority.

[Handwritten signature]
ACCOUNTS OFFICER (HAD)

Copy of the above is forwarded to Hanifa Bibi LHV Mr. Muhammad Younas and others for information.

[Handwritten signature]
ACCOUNTS OFFICER (HAD)

[Handwritten signature]

[Handwritten signature]