

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M No _____ 2024

In

Execution Petition No. 677/2022

In

Service Appeal No 2086/2019

Mst. Zubaida Hanif. **APPELLANT**

VERSUS

Government of Khyber Pakhtunkhwa & others. . . **RESPONDENTS**

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Application with Affidavit		1-3
2.	Copy of Notification dated 10.12.2021		4
3.	Copy of Complaints dated 28.12.2022, 12.07.2023, 13-07-2023, 18-07-2023 & 08.08.2023 against Mst. Fanoos Jamal DEO Bannu		5-10
4.	Copy of Notification dated 28.12.2022		11
5.	Copy of Letters dated 12.01.2023		12-13
6.	Copy of Inquiry Report dated 17.03.2023		14-18
7.	Copy of Letter dated 05-06-2023		19
8.	Copy of Notification dated 5-09-2023		20
9.	Copy of Notification dated 13.11.2023, Whereby Mst. Fanoos Jamal was promoted to BPS 19.		21
10.	Copy of Letter dated 19-03-2024		22-23

Through

Appellant

Fazal Shah Mohmand
Advocate Supreme Court

Dated: 27.10.2023

OFFICE:-

Cantonment Plaza Flat 3/B Khyber Bazar Peshawar. Cell # 0301 8804841

Email-

fazalshahmohmand@gmail.com

03-06-24
S-B
Peshawar

①
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M No _____ 2024

In

Execution Petition No. 677/2022

In

Service Appeal No 2086/2019

Khyber Pakhtunkhwa
Service Tribunal

Case No. 12904

Date 21-05-24

Mst. Zubaida Hanif, DEO (Female), presently Deputy DEO(F)
Mohmand, Ghallani District Mohmand. **APPELLANT**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary Establishment, Khyber Pakhtunkhwa, Peshawar.
3. Secretary Education, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. **RESPONDENTS**

APPLICATION FOR PLACING ON RECORD
ADDITIONAL DOCUMENTS WHICH MAY BE
READ AS PART AND PARCEL OF CAPTIONED
EXECUTION PETITION.

Respectfully Submitted:-

1. That the above titled Petition is pending before this honorable Tribunal and is fixed for 03.06.2024.

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2. That the following documents are very necessary to be included in the record and be placed before the Hon'ble Tribunal.

- I. Copy of Notification dated 10-12-2021.
- II. Copy of Complaints dated 28.12.2022, 12.07.2023, 13-07-2023, 18-07-2023 & 08.08.2023 against Mst. Fanoos Jamal DEO Bannu.
- III. Copy of Notification dated 28-12-2022.
- IV. Copy of Letters dated 12-01-2023.
- V. Copy of Inquiry Report dated 17-03-2023.
- VI. Copy of Letter dated 05-06-2023.
- VII. Copy of Notification dated 5-09-2023.
- VIII. Copy of Notification dated 13-11-2023, Whereby Mst. Fanoos Jamal was promoted to BPS 19.
- IX. Copy of Letter dated 19-03-2024.

It is therefore most humbly prayed, that on acceptance of this application, the appellant may please be allowed to submit/file the annexed documents before this honorable Tribunal and be read as part and parcel of the captioned Execution Petition and may be treated accordingly.

Through Appellant


Fazal Shah Mohmand ASC


Ibad Ur Rehman Khalil

&


Baseer Ahmad Shah
Advocates Peshawar

Dated:-21-05-2024

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M No _____ 2024
In
Execution Petition No. 677/2022
In
Service Appeal No 2086/2019

Mst. Zubaida Hanif. **APPELLANT**

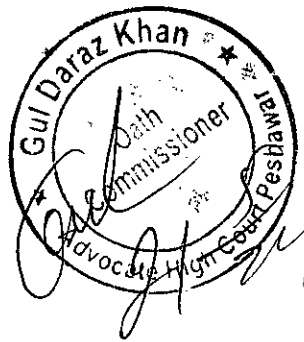
VERSUS

Government of Khyber Pakhtunkhwa & others. . . **RESPONDENTS**

AFFIDAVIT

I, Mst. Zubaida Hanif, DEO (Female), presently Deputy DEO(F) Mohmand, Ghallani District Mohmand, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Dated Peshawar the December 10th, 2021

JUSTIFICATION

1. SO(S/E)E&SED/4-17/2021/Bannu: WHEREAS Mst. Zubaida Hanif (MC BS-18) Ex-District Education Officer (Female) Mansehra was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. AND WHEREAS Mst. Tanzeela Sabahat (PMS BS-19) Executive Director E&SE KP and Mst. Samina Ghani (MC BS-19) DEO (Female) Peshawar were appointed as inquiry officer/inquiry committee to conduct inquiry against the accused Lady Officer for the charges levelled against her in accordance with the rules.

AND WHEREAS, the inquiry officer/inquiry committee after having examined the charges, evidence on record and explanation of the accused officer has submitted the inquiry report.

NOW, THEREFORE, in exercise of the powers conferred under Rule-14 of Khyber Pakhtunkhwa (Efficiency & Discipline) Rules-2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to exonerate Mst. Zubaida Hanif (MC BS-18) Ex-District Education Officer (Female) Mansehra from the charges levelled against her.

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

List of Even No. & Date:

- 1. Forwarded to the
 - Accountant General, Khyber Pakhtunkhwa, Peshawar
 - 2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
 - 3. District Education Officer (Female) Bannu
 - 4. District Accounts Officer Mansehra.
 - 5. PS to Chief Minister, Khyber Pakhtunkhwa.
 - 6. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar
 - 7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
 - 8. Mst. Zubaida Hanif (MC BS-18) Ex-District Education Officer (Female) Mansehra now DEO (Female) Kohistan Lower.
 - 9. Master File

(Signature)
(SAMIRA MEHSOOD)
SECTION OFFICER (SCHOOLS FEMA)

ATTESTED



Prime Minister's Performance Delivery Unit
(PMU)

Pakistan Citizen's Portal (PCP)

Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa

KP261222-90445974 (AB)

Print Date: 28/12/2022



A. Complaint Details

DATE OF COMPLAINT	26/12/2022	CURRENT STATUS	In Progress (since 2 Days, 0 months, 0 years)
COMPLAINT CATEGORY/ LEVEL 1:	Corruption / Malpractice	COMPLAINT SUB-CATEGORY/ LEVEL 2:	Financial Corruption (Corruption / Misappropriation in Govt Funds)
LOCATION OF COMPLAINT:	Bannu (Khyber Pakhtunkhwa, Pakistan)	COMPLAINT ADDRESS:	Bannu
GPS ADDRESS:	Hidden by citizen	CITIZEN PROFILE	Hidden by Citizen
COMPLAINT SUBJECT	Request for recovery due to bogus appointment with fake signature		

Contents

Respected sir Haleema namely DDEO FEMSLD Bannu appointed her nephew imranullah as chawkidar through fake signature of DEO FEMALE Bannu in the 2018 with the collusion of Nafid Clerk...president of clerks association The pay of (hr said chawkidar drawn through DDO of male side and during reconciliation of posts The said chawkidar came out as bogus by SDEO MALE Bannu. The SDEO writtenly submitted letter to DEO FEMALE Bannu and as well as to highups but haleema DDEO female and Nafid clerk ignored the letter. The pay change from BU-6073 to BU-6074 Haleema got millions of rupees from govt treasury with effect from 2018 in the name of bogus salary The appointment order of imranullah chawkidar fake and stamped bogus dispatch number ... Request for clear up inquiry...because previously I have complained but imran wazir namely Superintendent right hand of haleema stopped complain through programmer Request for inquiry and disciplinary action against all officials

Attachment

This complaint has 1 attachment.

B. Complaint Processing History

#	DATED	FROM	TO	STATUS	REMARKS
1	27/12/2022	Directorate of Anti-Corruption	Directorate of Elementary & Secondary Education	In-progress	Dear Officer, Have these allegations been probed departmentally. What was the outcome of fact finding inquiry if any Please share your view/ response on the basis of available record and depute an officer for fact finding inquiry. The complaint is being placed on watch list for follow up and cognisance by ACE.
2	27/12/2022	Chief Secretary, Khyber Pakhtunkhwa	Directorate of Anti-Corruption	In-progress	Dear citizen, your complaint has been forwarded to concerned department.
3	26/12/2022	Initiated	Chief Secretary, Khyber Pakhtunkhwa	In-progress	Complaint has been assigned to Chief Secretary, Khyber Pakhtunkhwa

[Signature]
ATTESTED

Prime Minister's Performance Delivery Unit (PMDU)

Pakistan Citizen's Portal (PCP)

Elementary & Secondary Education Khyber Pakhtunkhwa

KP261222-90445974 (AB)

Print Date: 12/07/2023



A. Complaint Details

DATE OF COMPLAINT	26/12/2022	CURRENT STATUS	In Progress (since 18 Days, 6 months, 0 years)
COMPLAINT CATEGORY/ LEVEL 1:	Corruption / Malpractice	COMPLAINT SUB-CATEGORY/ LEVEL 2:	Financial Corruption (Corruption / Misappropriation in Govt. Funds)
LOCATION OF COMPLAINT:	Bannu (Khyber Pakhtunkhwa, Pakistan)	COMPLAINT ADDRESS:	Bannu
GPS ADDRESS:	Hidden by citizen	CITIZEN PROFILE	Hidden by Citizen
COMPLAINT SUBJECT	Request for recovery due to bogus appointment with fake signature		

Contents

Respected sir Haleema namely DDEO FEMSLD Bannu appointed her nephew imranullah as chawkidar through fake signature of DEO FEMALE Bannu in the 2018 with the collusion of Nafid Clerk.....president of clerks association The pay of the said chawkidar drawn through DDO of male side and during reconciliation of posts The said chawkidar came out as bogus by SDEO MALE Bannu. The male SDEO writtenly submitted letter to DEO FEMALE Bannu and as well as to highups but haleema DDEO female and Nafid clerk hidden the letter . The pay change from BU-6073 to BU-6074 Haleema got millions of rupees from govt treasury with effect from 2018 in the shape of bogus salary The appointment order of imranullah chawkidar fake and stamped bogus dispatch number ... Request for clear cut inquiry. ...because previously I have complained but imran wazir namely Superintendent right hand of haleema stopped complaint through programmer Request for inquiry and disciplinary action against all officials

Attachment

This complaint has 1 attachment.

3. Complaint Processing History

#	DATED	FROM	TO	STATUS	REMARKS
1	11/07/2023	Directorate of Elementary & Secondary Education	Secretary, Elementary & Secondary Education	In-progress	Sir, the inquiry report is forwarded to your good office (copy attached) for further necessary action please..
2	11/07/2023	Directorate of Elementary & Secondary Education	Citizen	<input checked="" type="checkbox"/> Reopened In-progress	For attachment
3	11/07/2023	Directorate of	Citizen	<input checked="" type="checkbox"/> Reopened	For attachment

Handwritten signature
ATTESTED

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	FROM	TO	STATUS	REMARKS	
	01/2023	Directorate of Elementary & Secondary Education	Citizen	Resolved (PRG) ★	<p>Dear Citizen, your complaint is in-process at hand of an honest inquiry officer to dig-out facts and for fixing responsibilities. In this connection the dispatch register is in NAB custody. The Inquiry officer sent letters to NAB authority for providing attested copies of dispatch register and others to DAO, Bannu for providing record.</p> <p>As per user manual guide lines of Pakistan Citizen Portal, the complaint has completed its limited time of 20 days, therefore the complaint is resolved as partially resolved. Please wait till the arrival of inquiry recommendation for fully resolution. Thank you for using Pakistan Citizen Portal.</p>
5	29/12/2022	Directorate of Elementary & Secondary Education	Citizen	In-progress	Dear Citizen your Complaint is approved for inquiry and Muhammad Ilyas DEO (M) Larik Marwat has been Nominated as inquiry Officer, please.
6	28/12/2022	Directorate of Elementary & Secondary Education	Citizen	In-progress	Dear Citizen, your complaint is in-process, please wait and thank you for using Pakistan Citizen Portal
7	27/12/2022	Directorate of Anti-Corruption	Directorate of Elementary & Secondary Education	In-progress	Dear Officer, Have these allegations been probed departmentally. What was the outcome of fact finding inquiry if any. Please share your view/ response on the basis of available record and depute an officer for fact finding inquiry. The complaint is being placed on watch list for follow up and cognisance by ACE.
8	27/12/2022	Chief Secretary, Khyber Pakhtunkhwa	Directorate of Anti-Corruption	In-progress	Dear citizen, your complaint has been forwarded to concerned department.
9	26/12/2022	Initiated	Chief Secretary, Khyber Pakhtunkhwa	In-progress	Complaint has been assigned to Chief Secretary, Khyber Pakhtunkhwa

D. Citizen's Feedback

★ ★ ★ ★ ★ (5 out of 5)

Satisfied: Yes

Great work by department . We will wait for inquiry officer recommendation

Dated: 18/02/2023

ATTESTED

(8)

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

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No.PCP File/Gen/SO(C.)E&SED/KPK/1-7/2022/SE-Nil

Dated 13.07.2023

To

The Director,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar.

Attention: The Assistant Director (Complaint),
Directorate of E&SE Department,
Khyber Pakhtunkhwa Peshawar.

Subject: **COMPLAINT AGAINST DEO (FEMALE) BANNU AND MINISTERIAL
STAFF, RECEIVED THROUGH (PAKISTAN CITIZEN PORTAL) NO.
KP261222-90445974 (AB).**

I am directed to refer to the subject cited above and to enclose herewith a copy of complaint received through Pakistan Citizen Portal vide No. KP261222-90445974 (AB) dated: 12.07.2023 and to state that Assistant Director (Complaint), Directorate E&SED constituted fact finding inquiry and nominated Mr. Ilyas Khan, DEO (Male) Lohar Marwat as Inquiry Officer regarding bogus appointment of Mr. Imran Ullah Chowkidar through fake signature in the year 2018. The Inquiry Officer submitted comprehensive report to Directorate of E&SED dated: 05.06.2023. The covering letter the said Inquiry Report uploaded to Pakistan Citizen Portal online complaint dashboard with the remarks that the Inquiry Report is forwarded to your good office for further necessary action dated: 03.07.2023 while, except the covering letter the report is found detached.

I am further directed to state that the Inquiry Report/Recommendations may be submitted to this office within 03 days positively, as the subject complaint is near to super escalation reflected on the Dashboard of Secretary, E&SE Department.

Encl: As Above:

[Signature]
ATTESTED

[Signature] 13/7
SECTION OFFICER (COMPLAINT).

Endst: of even number & date:
Copy of the above is forwarded to the:

1. PS to Secretary, E&SE Department.
2. PA to Additional Secretary (Monitoring), E&SE Department Peshawar.
3. PA to Deputy Secretary (Monitoring) E&SE Department.
4. District Education Officer (Female), Bannu.
5. Section Officers (Enquiry, Management Cadre), E&SE Department.

[Signature] 13/7
SECTION OFFICER (COMPLAINT).

Reference to your office notification bearing 5901-04 File. PCP/21-
Complaint Cell /2022 dated 28-12-2022, enclose please find the detail enquiry
report along with necessary documents equal to thirty-eight (38) Pages for your
perusal & further necessary action, please.



**DIRECTORATE OF
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
KHYBER PAKHTUNKHWA, PESHAWAR**
Phone: 091-9225336, 9235342, E-mail: complaintcellse@gmail.com



No. 7608 /File: PCP/21-6/Complaint Cell/2022
Dated Peshawar the 18-7-2023

To

The Section Officer (Complaint),
Elementary & Secondary Department,
Khyber Pakhtunkhwa Peshawar.

Subject: - **COMPLAINT AGAINST DEO(FEMALE) BANNU AND MINISTERIAL
STAFF, RECEIVED THROUGH (PAKISTAN CITIZEN PORTAL)
NO.KP261222-90445974(AB)**

I am directed to refer to your office letter vide No. PCP File/Com/SD (C)
E&SED/KPK/1-7/2022/SE-Nil Dated 13-07-2023 on the subject cited above and to
enclose the inquiry report along with its enclosure of inquiry officer of Mr.
Muhammad Ilyas Khan District Education Officer (Male) Lakki Marwat, received to
this Directorate vide No.4768 dated 05/6/2023 (Copy Attached) on the subject cited
above.

I am further directed to submit the case to your good office for perusal and
further necessary action, please.

Enclose as Above.

Assistant Director (Complaint)
Directorate of E&SE KPK

Endst. No. _____/

Copy forwarded to the: -

1. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.

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Assistant Director (Complaint)
Directorate of E&SE KPK



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223547

No.PCP.File/Gen/SO(C.)E&SED/KPK/1-7/2022/SE-NII

Date: 08.08.2023

To

The Section Officer (Enquiry),
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar.

16/8/23

Subject:

COMPLAINT AGAINST DEO (FEMALE) BANNU AND MINISTERIAL STAFF, RECEIVED THROUGH (PAKISTAN CITIZEN PORTAL) NO. KP261222-90445974 (AB).

I am directed to refer to the subject cited above and to enclose herewith a copy letter No. 7608/File: PCP/21-6/Complaint Cell/2022 dated: 18.07.2023 along-with Inquiry Report/Recommendations, received from Assistant Director (Complaint), Directorate of E&SE Department Khyber Pakhtunkhwa Peshawar.

I am further directed to state that as per recommendations of the Inquiry Officer the charges proved against Mst. Fanoos Jamal, Ex-DEO (Female) Bannu now, DEO (Female) Karak, therefore, Formal Inquiry may be proceeded under E&D Rules, 2011, under intimation to this office, as desired by the Competent Authority, please.

Encl: As Above:

SECTION OFFICER (COMPLAINT)

Endst: of even number & date:

Copy of the above is forwarded to the:

1. Director, E&SE Department Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary, E&SE Department.
3. PA to Additional Secretary (Monitoring), E&SE Department Peshawar.
4. PA to Deputy Secretary (Monitoring) E&SE Department.
5. District Education Officer (Female), Bannu.
6. Section Officers (Management Cadre), E&SE Department.

SECTION OFFICER (COMPLAINT)

ATTESTED

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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

KHYBER PAKHTUNKHWA, PESHAWAR

Phone: 091-9225336, E-mail: complaintcellese@gmail.com

NOTIFICATION

Muhammad Ilyas, DEO (M) (BS-18), Lakki Marwat is nominated as an enquiry officer to conduct fact finding inquiry in a complaint received through Pakistan Citizen Portal vide No. KP261222-90445974 (AB) regarding appointment of Mr. Imran Ullah as a Chowkidar through fake signature of DEO (F) Bannu. (copy of the letter attached).

The inquiry officer concerned is requested to submit their findings & clear cut recommendations to this office on or before 06-01-2023, positively.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst:No.

5961-64

File. PCP/21-06/Complaint Cell/2022

Dated Pesh: the 28 / 12 / 2022

- Coy of the above is forwarded for information and n/action to the:-
1. Muhammad Ilyas, DEO (M) (BS-18), Lakki Marwat.
 2. District Education Officer (Male) Bannu with the remarks to provide relevant record to the above mentioned inquiry officer as and when required.
 3. District Education Officer (Female) Bannu with the remarks to provide relevant record to the above mentioned inquiry officer as and when required.
 4. P.A to Director E&SE KPK.

Assistant Director (Complaint)
Elementary & Secondary Education

E:\Complaint Cell\Complaint Cell\ANTI-CORRUPTION\Nomination Of Inquiry Officer 3755.doc

ATTESTED

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**Office of The District Education Officer
Male Lakki Marwat**

Ph: (0969)538291, email: mlakki@vahoo.com
www.facebook.com/deo.male.lakki, www.twitter.com/deo_m_lakki

No. 408Dated. 12-01-2023

To,

The District Account Officer
Bannu.

Subject: PROVISION OF RECORD FOR ENQUIRY.

With reference to Director Elementary & Secondary Education Khyber Pakhtunkhwa notification bearing No 5961-64 File No. PCP /21-06/Complaint Cell /2022 dated 28-12-2022 in light of complaint filed through Pakistan citizen portal vide no KP 261222-90445974(AB) regarding appointment of Mr. Imran Ullah Chowkider through fake signature of DEO (F) Bannu in 2018 by Miss Halima DDEO (F) Bannu along with Nafid clerk. To proceed further into the matter the undersigned require the following detail of Mr. Imran Chowkider bearing CNIC No11101-4194434-9- & personal 926801 against the post of chowkider till January 20, 2023.

1. Pay releases order issued by the office of the then EDEO Karak as it is not available in the office of DEO (F) Bannu & was mandatory as per his appointment order.
2. Copy of employment exchange.
3. Copy of verified documents from concerned institutions it was mandatory as per his appointment order.
4. Copy of Source I duly signed by the then SDEO/DDO.
5. Reason why 1st salary has been transferred on his personal account instead of DDO designated account.
6. Reason why salary has been activated in BU 6073 instead of BU 6074.
7. Copy of Source -II from concerned DDO regarding his stoppage of pay.
8. Copy of Source -II from concerned DDO regarding activation of his pay in BU 6074.
9. Total amount of gross salary drawn since his appointment till date.

Inquiry Officer/
District Education Officer
(Male) Lakki Marwat

Even No. & Dated

Copy to:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

attest
ATTESTED

District Education Officer
(Male) Lakki Marwat

13



**Office of The District Education Officer
Male Lakki Marwat**

Ph: (0969)538291, email: emislakki@yahoo.com
www.facebook.com/deomalelakki, www.twitter.com/deo_m_lakki

No. 409

Dated. 12-01-2023

To,

Mr. Wasif Khan
Assistant Director NAB (KP)

Subject: PROVISION OF ATTESTED COPY OF DISPATCH RECORD
DATED 11-09-2019.

With reference to Director Elementary & Secondary Education Khyber Pakhtunkhwa notification bearing No 5961-64 File No. PCP /21-06/Complaint Cell /2022 dated 28-12-2022 in light of complaint filed through Pakistan citizen portal vide no KP. 261222-90445974(AB) regarding appointment of Mr. Imran Ullah Chowkider through fake signature of DEO (F) Bannu in 2018 by Miss Halima DDEO (F) Bannu along with Nafid clerk.

The undersigned has been nominated as an enquiry officer to probe into the allegation (Annex A).

On dated 10-01-2023 the undersigned visited the office of DEO (F) Bannu where it was brought in to the notice of undersigned that official dispatch register of the office of DEO (F) Bannu is in the custody of Mr. Wasif Khan Assistant Director NAB KPK & proper receipt in this context is enclosed as (Annex B).

Keeping in view the above detail you are kindly requested to provide attested copy of the above cited dispatch register containing the record of Ends. No issued on dated 11-09-2019 (Annex C).

Furthermore the undersigned will visit your office in next week to collect the same. Your cooperation in this context is requested, please.

Inquiry Officer/
District Education Officer
(Male) Lakki Marwat

Even No. & Dated

Copy to:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with reference to the above cited letter.
2. District Education Officer (Female) Bannu.

ATTESTED

District Education Officer
(Male) Lakki Marwat

Scanned with CamScanner

(16) 14

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) LAKKI MARWAT

ENQUIRY REPORT

Authority: Director E&SE Khyber Pakhtunkhwa Peshawar vide Notification No 5961-64 File. PCP/21-06/Complaint Cell /2022 dated 28-12-2022

Venue : Office of DEO (F) Bannu

Dated : March 17, 2023

INTRODUCTION

Reference to the above cited notification of the Director E&SE Khyber Pakhtunkhwa Peshawar, whereby, an inquiry through the undersigned was constituted in light of complaint filed through Pakistan citizen Portal vide No KP261222-90445974(AB) regarding appointment of Mr. Imran Ullah Chowkidar through fake signature of District Education Officer (F) Bannu

BACKGROUND OF THE CASE

The fact of the case is that complaint through Pakistan citizen portal vide No KP261222-90445974(AB) was filed. The prayer of the complainant was that Miss Haleema DY.DEO in association with Clerk named Nafid, who is also president of the clerk association, appointed one of his close relatives named Imran Ullah as chowkidar. Later on, his salary was drawn through Male DDO Bannu. During reconciliation of the post, it came to surface & his salary was shifted from cost center BU 6073 to BU 6074 & thus Miss Haleema manage million of rupees from govt treasury. Furthermore Mr. Imran Ullah appointment order contains bogus dispatch register (Annex A)

PROCEDURE FOLLOWED

After the receipt of above cited notification the undersigned requested District Education Officer (F) Bannu vide letter No 9100 dated 30-12-2022 (Annex B) with the request that the undersigned will visit your good office dated 10-01-2023 for conducting above cited enquiry. The office of DEO (F) Bannu was further requested for the availability of relevant record of the case as shown in below Table A, along with well conversant officer /official of the case & Mr. Haleema Dy.DEO F Bannu. Mr, Nafid Clerk, Mr. Imran Ullah Chowkidar & ADEO (F) Estab O/O DEO (F) Bannu.

TABLE A

S. No	Documents required
1	Application of Mr. Imran Ullah submitted to the office of DEO F Bannu for appointment against the post of Chowkidar
2	Verified copy of employment exchange card showing Mr. Imran Ullah name in both consolidated district wise & individual list
3	Interview attendance of the candidate
4	Final merit list showing his name & position
5	Working Paper
6	Notification of nominee of appointing authority for DSC
7	Nomination letter of the nominee of the administrative department /Director E&SE


ATTESTED

	Letter for DSC meeting showing date & time
	Minutes of the DSC Meeting
10	Appointment order of the cited chowkider
11	Charge report of the applicant
12	Office dispatch register showing the record of the relevant appointment order
13	Pay release order issued by the competent authority
14	Initial source -1 signed by the concerned SDEO /DDO
15	Copy of the service book of the cited chowkider Detail of shifting of salary in various DDO Code
16	Duty Certificate
17	Total amount drawn till date

On the stipulated date, the undersigned visited the office of DEO (F) Bannu & met with all concerned. Written Statement of Mr. Nasir J/C, dealing concerned (Annex C-) was reordered. He stated at the bar that he has not received any kind of record pertaining to Mr. Imran Ullah Chowkidar.

Furthermore, written Statement of Mr. Nafid Clerk were also recorded which is (Annex D). He flatly denied his association or involvement in the cited case.

Statement of Mr. Shadman EX J/C was also recorded. According to him he has no knowledge or record of the cited case (Annex E).

The undersigned vide letter No 408 dated 12-01-2023 (Annex F) also requested District Account Officer Bannu for the provision of following record as per below table.

TABLE B

S. No	Documents required
1	Pay releases order issued by the office of the DEO (F) Bannu as it is not available in the office of DEO (F) Bannu & was mandatory as per his appointment order.
2	Copy of employment exchange
3	Copy of verified documents from concerned institutions as it was mandatory as-per his appointment order
4	Copy of Source I dully signed by the then SDEO/DDO.
5	Reason why 1 st salary has been transferred on his personal account instead of DDO designated account
6	Reason why salary has been activated in BU 6073 instead of BU 6074
7	Copy of Source -II from concerned DDO regarding his stoppage of pay.
8	Copy of Source -II from concerned DDO regarding activation of his pay in BU 6074
9	Total amount of gross salary drawn since his appointment till date

The District Account officer Bannu vides its letter No DAO/Admn-1/ BU Misc/2022-23/215 dated 18-01-2023 (Annex G) provided the following documents

1. Source -1 Performa dully signed by the DDO concerned
2. Copy of Source -II Performa dully signed by the DDO
3. Copy of activation Source -II dully signed by the DDO concerned.

During discussion it came to known that office dispatch register is in the custody of NAB. In this connection the office of DEO F Bannu presented proper receipt /seizure Memo (Annex H).

ATTESTED

(16) 3

The undersigned vide letter No 409 dated 12-01-2023 requested Mr. Wasif Khan Assistant Director NAB (KP) to provide the attested copy of above cited register containing record of Ends No issued on dated 11-09-2010. (Annex I)

Later on, Mr. Adnan Abass Additional Director (Staff) for Director General NAB (KP) vide No 1/34/(1065)/IW-I/NAB(NAB(KP))/66 dated 22-02-2023 (Annex J) informed the undersigned that dispatch register which is in the custody of NAB under seizure memo 17-02-2021 contain 128*No of Pages (from 01.01.2019 to 04-05-2019). The relevant record (3*pages) is enclosed with the letter for ready references. However, the requested dispatch record of DEO (F) Bannu dated 11-09-2019 is not in the custody of this bureau.

The undersigned also served questioner upon Miss Haleema Dy. DEO (F) Bannu & Mr. Imran Ullah Chowkidar and their reply along with questioner is (Annex K & L).

More over to ascertain the status of the appointment order issued by Miss Fanoos Jamal the then DEO (F) Bannu Now DEO (F) Karak was asked & her replies along with questioner are (Annex M). It is further stated that she refused to own her signature.

Similarly, statement of Mr. Barkat Ali Ex Litigation officer in the O/O DEO(F) Bannu & Mr. Akhtar Niaz Ex Supt who were the members of DSC were recorded (Annex N). They stated that they both were the part of DSC meeting held for the appointment of Mr. Imran Ullah Chowkidar.

The District Education Officer (F) Bannu vide letter No 1269 dated 15-02-2023 (Annex O) & No 2251 dated 16-03-2023 (Annex P) was requested to provide the same & finally the DEO(F) Bannu vide letter No 3928 dated 17-03-2023 provide the record as per below (Annex Q).

TABLE C

S. No	Detail of required Documents	Detail of Documents provided by DEO(F) Bannu
1	Application of M., Imran submitted to the office of DEO F Bannu for appointment against the post of Chowkider	Yes
2	Verified copy of employment exchange card showing Mr. Imran Ullah name both consolidated district wise & separately	No
3	Interview attendance of the candidate	No
4	Final merit list showing his name & position	No
5	Working Paper	No (It is simple page with no detail)
6	Notification of nominee of appointing authority for DSC	No
7	Nomination letter of the nominee of the administrative department /Director E&SE	No
8	Letter for DSC meeting showing date & time	No
9	Minutes of the DSC Meeting	No
10	Appointment order of the cited chowkider	No
11	Charge report of the applicant	Yes
12	Office dispatch register showing the record of the relevant appointment order	Yes
13	Pay release order issued by the competent authority	Yes
14	Initial source -1 signed by the concerned SDEO /DDO	Yes
15	Copy of the Service Book of the cited chowkider	No
		Yes

ATTESTED

16	Detail of shifting of salary in various DDO Code	No
17	Duty Certificate	Yes
18	Total amount drawn till date	No

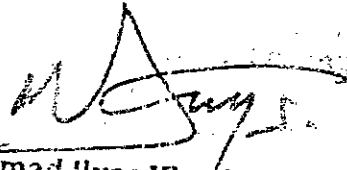
FINDINGS /KEY POINTS OF THE CASE

The perusal of above detail & available record the following points are brought into surface.

- I. It is true that Mr. Imran Ullah was appointed against the post of Chowkidar and he is very close relative of Miss Haleema Dy. DEO (F) Bannu
- II. Mr. Imran Ullah was appointed against the post of chowkider in GGPS Beri Khel Mandan Bannu.
- III. Employment registration card, DSC Minutes & appointment order of Mr. Imran Ullah are available (Annex R).
- IV. Working Paper consist of single page with no detail. It is just like formality. (Annex S)
- V. Appointment order bearing No 704-709 dated 11-09-2019 in r/o Mr. Imran Ullah is available on DEO(F) office Dispatch register. (Annex T)
- VI. Initial salary on Source -I & II unverified by Account office was submitted on DDO code BU 6073(Annex U) however as per account office verified Source -II (Annex V) salary was process on DDO Code BU 6074 specified for SDEO (M) Bannu for the reason best known to the officer concerned.
- VII. Keeping in view the statement of other DSC member regarding their participation Miss Fanoos Jamal Statement regarding her fake signature /refusal to own her signature carry no worth.
- VIII. Record keeping is very poor

KEEPING IN VIEW THE ABOVE DETAIL IT IS RECOMMENDED THAT

1. The allegation of fake signature of the Miss Fanoos Jamal the then DEO(F) Bannu Now DEO (F) Karak is baseless
2. The allegation contained in the instant complaint regarding involvement of Miss Haleema DY DEO F Bannu & Mr. Nafid J/C in appointment of Mr. Imran Ullah has no worth. Hence both may please be exonerated of the charges.
3. In light of DSC members statement Miss Fanoos Jamal Ex-DEO(F) now DEO (F) Karak may please be proceeded formally due to her wrong statement and refusal from her signature on the appointment order of Mr. Imran Ullah.



(Muhammad Ilyas Khan)
Inquiry Officer/ District Education Officer (Male)
Lakki Marwat.

sub
ATTESTED

(18) 97 5

**OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE LAKKI MARWAT**

: (0969)53 @1, samista00@yahoo. f. n. www.facebook.com/deomalelak www.twitter.com/deo_m_lakki

To

No. _____

Dated. _____

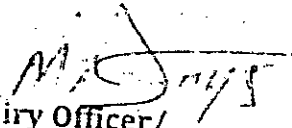
The District Education Officer,
(Female) District Bannu.

Subject: **INQUIRY**

With reference to Director Elementary & Secondary Education Khyber Pakhtunkhwa notification bearing No 5961-64 File No. PCP /21-06/Complaint Cell /2022 dated 28-12-2022 in light of complaint filed through Pakistan citizen portal vide no KP 261222-90445974(AB) regarding appointment of Mr. Imran Ullah Chowkider through fake signature of DEO (F) Bannu in 2018 by Miss Halima DDEO (F) Bannu along with Nafid clerk . To proceed further into the matter the undersigned will visit your officer on 10-01-2023 at 10:00 am & you are therefore, kindly requested to provide Two (02) sets the following document dully attested by your good office

You are further requested to inform the cited chowkider, Mr. Nafid Clerk ADEO (P) Estb & Miss Haleema (DDEO F) Bannu to ensure their presence along with relevant record on the date & time as mentioned above

1. Application of cited Chowkider submitted to the office of DEO(F) for appointment against the post of chowkider
2. Copy of employment registration card showing his name in verified consolidated list
3. Interview attendance of the candidate.
4. Final merit list showing his name & position
5. Working Paper.
6. Notification of nominee of the appointing Authority for DSC.
7. Nomination letter of the nominee of administrative department/Director E&SE.
8. Letter for schedule of the DSC meeting.
9. Minutes of the DSC meeting.
10. Appointment order of the cited chowkider
11. Charge report of the appellant.
12. Office dispatch register showing the record of the relevant appointment order
13. Pay release order by the Competent Authority.
14. Initial Source -I dully signed by concerned SDEO/DDO.
15. Copy of service book of the cited chowkider
16. Detail of shifting of salary from various DDOs codes.
17. Duty certificate
18. Total amount drawn till date.

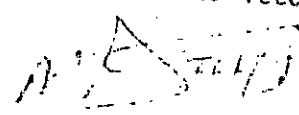

Inquiry Officer/
District Education Officer
(Male) Lakki Marwat

Even No. & Dated

Copy to:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Male) Bannu for the provision of relevant recode pertaining to the case on his part, if any.


ATTESTED


District Education Officer
(Male) Lakki Marwat



(15)

154

(19)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) LAKKI MARWAT

Phone No: 0969-538291 - Fax No: 0969-538291

No 4768

Dated 05-06-2023

To
The Director
Elementary & Secondary Education
Khyber Pakhtun Khawa, Peshawar.

Subject: ENQUIRY REPORT

With reference to your office notification bearing 5961-64 File. PCP/21-06/Complaint Cell /2022 dated 28-12-2022, enclose please find the detail enquiry report along with necessary documents equal to thirty-eight (38) Pages for your perusal & further necessary action, please.

(Muhammad Iqbal Khan)
Inquiry Officer/ District Education Officer
(Male) Lakki Marwat.

c-cell

1421
12-6-2023.

sub
ATTESTED



Dated Peshawar the Sep 5th, 2023

NOTIFICATION

No. SO(INO)E&SED/1-18/Complaint/DDEO (F) Bannu: Mr. Noman Wazir, Deputy Secretary, Transport Department is hereby nominated as inquiry officer to conduct de novo inquiry into the complaint received through Pakistan Citizen Portal vide No. KP261222-90445974 (AF) regarding appointment of Mr. Imran Ullah, Chowkidar, GGPS Beri Khel Mandan, Bannu through fake signature of DEO (F), Bannu.

2. The inquiry officer shall submit report within fifteen days positively.
3. Copy of complaint is attached.

Sd/
Secretary
E&SE Department

Endst: of Even No. & Date:

Copy of the above is forwarded to:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. Mr. Noman Wazir, Deputy Secretary, Transport Department.
3. District Education Officer (Female), Bannu.
4. PS to Secretary E&SE Department.
5. PA to Deputy Secretary (Admn), E&SE Department.
6. Master file.

Sd/
(Bilal Khan)
Section Officer (Inquiries)

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9210626

21

Dated: 13th November, 2023

NOTIFICATION

NO.SO(MC)E&SED/1-3/2023/PROMOTION(MC-BS-19): The Competent Authority (Chief Minister, Khyber Pakhtunkhwa) on the recommendations of the Provincial Selection Board, in its meeting held on 19.09.2023, in agenda item No. 01, is pleased to appoint the following Deputy District Education Officers / Deputy Directors (Female MC BS-18) of Elementary & Secondary Education Department as District Education Officers / Additional Directors (MC BS-19) on Acting Charge Basis, with immediate effect:-

S #	Name of officer	Remarks
1.	Mst. Rehana Yasmin (MC BS-19)	Appointed on Acting Charge Basis
2.	Mst. Shahida Parveen (MC BS 19)	Appointed on Acting Charge Basis
3.	Mst. Nighat Bibi (MC BS-19)	Appointed on Acting Charge Basis
4.	Mst. Nargis Jabeen (MC BS-19)	Appointed on Acting Charge Basis
5.	Mst. Laila Ali (MC BS-19)	Appointed on Acting Charge Basis
6.	Mst. Mehr un Nisa (MC BS-19)	Appointed on Acting Charge Basis
7.	Mst. Fanoos Jamal (MC BS-19)	Appointed on Acting Charge Basis
8.	Mst. Hussan Ara (MC BS-19)	Appointed on Acting Charge Basis

2. The placement/posting Notification will be issued subsequently.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. All District Education Officers (Female) in Khyber Pakhtunkhwa.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officer of concerned districts.
6. SO (PSB), Establishment Department.
7. PS to Minister E&SE Khyber Pakhtunkhwa.
8. PS to Secretary Establishment, Khyber Pakhtunkhwa.
9. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
10. Master file.

11/13-11-2023
(IMRAN ZAMAN)
SECTION OFFICER (Management Cadre)

ATTESTED



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

No. SO(Inq)E&SED/1-18/2023/Complaint against DEO (F) Bannu
Dated Peshawar the March 19th, 2024

To

1. Mst. Fanoos Jamal,
Ex-DEO (F) Bannu now DEO (F) Karak.
2. Mst. Halima Bibi,
Ex-SDEO (F) Bannu now DDEO (F) Bannu.
3. Mr. Akhtar Niaz Khan,
Superintendent, O/o DEO (F) Bannu.
4. Mr. Barkat Ali Khan,
Litigation Officer, O/o DEO (F) Bannu.

SUBJECT: PERSONAL HEARING.

I am directed to refer to the subject noted above and to state that a personal hearing has been scheduled to be held on **Wednesday March 27th, 2024 at 12:00 PM** in the office of **Additional Secretary (Monitoring), E&SE Department** regarding appointment of Mr. Imran Ullah, Chowkidar.

02. I am further directed to request you to attend the subject hearing on the date, time & venue mentioned above.

(3 P-15)
[Signature]

(Bilal Khan)

Section Officer (Inquiries)

Endst: of Even No. & Date:

Copy of the above is forwarded to the:

1. District Education Officer (Female), Bannu with the request to attend the subject hearing on the date, time & venue mentioned above alongwith original working paper, DSC minutes and appointment order of Mr. Imran Ullah, Chowkidar.
2. PS to Secretary, E&SE Department.
3. PA to Deputy Secretary (Mon), E&SE Department.

(3 P-15)
[Signature]

Section Officer (Inquiries)

[Signature]
ATTESTED

(23)

(Handwritten mark)

جناب وزیر اعلیٰ صاحب، چیف سیکرٹری صاحب و سیکرٹری صاحب اجماعی تعلیم خیبر پختونخوا

جناب عالی!

عنوان: شکایت بر خلاف فانوس جمال ڈی ای او زمانہ کرک

جناب عالی! ڈی ای او زمانہ کرک فانوس جمال کرک کو ڈبئی مانگی ہے وہ دونوں ہاتھوں دونوں پاؤں سے کما کر، حکام بالا و اعلیٰ وقتیشی افسران و دفتر علیٰ کو بھی خوش رکھتی ہے۔ دفتر میں تین کلرک ارشد، رمضان، جاوید دلال بلکہ سیزمین ہیں۔ فانوس ہفتہ میں صرف ایک دن دفتر آتی ہے۔ دلال سو دے ملے کر کے تین چار لاکھ اسکے حوالے کر کے تبادلوں اور تقرریوں پر دستخط کر کے چلی جاتی ہے۔ معمول کے دفتری کام دھرے کے دھرے رہتے ہیں۔

SSS
Handwritten initials

۱- علاقہ غیر یعنی منم اضلاع سے سینکڑوں تبادلے بعض ایک لاکھ روپے فی نفر کر گئی۔

۲- اندرون ضلع یونین کونسلز کا خیال رکھے بغیر سینکڑوں تبادلے بحساب 60 ہزار روپے فی نفر کرتی ہے۔

۳- ڈیپٹمنٹ جو کہ بند ہے سینکڑوں کئے۔ اب ڈیپٹمنٹ کو ایڈجسٹمنٹ کا نام دے کر کر رہی ہے۔ بحساب 60 ہزار روپے فی نفر کر گئی۔

۴- ایس ایس کیلئے مجوزہ پروموشن آرڈر ابھی جاری نہیں ہوئے ہیں۔ کہ موصوفہ بحساب 80 ہزار فی نفر تبادلے کر گئی۔

۵- اکثر ان سکولوں میں جاتی ہے۔ جہاں ڈیپٹمنٹ یا غیر قانونی آستانوں بھنائے رکھی ہیں۔ پھر ان کو حکم دیتی ہے کہ اپنے اپنے سکولوں میں واپس جاؤ وہ آستانیاں دس دس ہزار روپے دے دیتی ہیں تو خاموش ہو جاتی ہیں۔

۶- پی ٹی سی فنڈ میں سے پیسے مانگتی ہے۔ ٹی اے بلز پاس کرنے پر پیسے مانگتی ہے۔ دفتر کیلئے دو نمبر سولر خرید کر چار لاکھ کیشن وصول کر گئی۔ بانڈ اور چوتھرہ کے سکول خالی پڑے ہیں۔ افسران بالا اسکے دوست ہیں۔ اندے گونگے اور ہرے بیٹھے ہیں۔

جناب عالی! مذکورہ ڈی ای او فیملی فانوس جمال اور اس کے دفتری سولت کاروں کے خلاف اعلیٰ سطح پر انکوائری کی جائے ان کو چارج شیٹ جاری کیا جائے اور برطرف کیا جائے تاکہ آئندہ کوئی اور اس طرح کرپشن کی ہمت نہ کریں۔

العارض
شیخ الدین گاؤں رحمت آباد ضلع کرک

05-11-2023

solcamp

ATTESTED