

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR

Service Tribunal Appeal No. 267 of 2024

Hazrat Bilal

Versus

Secretary Elementary & Secondary Education, KP and others

INDEX

S/NO	SUBJECT	ANNEXURE	PAGE NO
1.	Comments / Reply from respondents		1-6
2.	Affidavit		07
3.	Copy of appointment order	A	08-10
4.	Copy of Complaint filed by one Shahzaib	B	11
5.	Copy of letter to Assistant Commissioner for verification of appellant's dual domiciles	C	12
6.	Copy of letter by Assistant Commissioner along-with report of domicile clerk and copies of both domiciles	D, E, F & G	13-16
7.	Copy of order for constitution of committee	H	17
8.	Copy of order for personal hearing	I	18
9.	Copy of attendance of appellant on hearing	J	19
10.	Copy of questionnaire and reply	K & L	20-22
11.	Copy of report of inquiry committee and order of dismissal of appellant's appointment contract	M & N	23-26
12.	Authority Letter		27

11-03-24

Zahoor Khan
District Education officer (M)
Lakki Marwat

1

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR**

Service Tribunal Appeal No. 267 of 2024

Hazrat Bilal

Versus

Secretary Elementary & Secondary Education, KP and others

Written Reply on behalf of Respondent No. 2 & 3

**Khyber Pakhtunkhwa
Service Tribunal**

Dated: 12/7/24

By: 13-05-2024

Respectfully Sheweth:

Preliminary Objections:

- A. The appeal is wholly incompetent and untenable.
- B. The appellant has not come to the Hon'ble Tribunal with clean hands.
- C. The appeal is filed by the appellant with malafide intent.
- D. The appeal is suffer from exaggeration and mis-statement.
- E. The appellant has no locus standi and cause of action.
- F. The appellant has not come to the Hon'ble Tribunal with clean hands. The appeal also suffers from mis-statement and concealment of facts and as such the appellant is not entitled to any relief.
- G. The appeal is liable to be dismissed due to non-joinder and mis-joinder.
- H. That the appellant has not achieved the status to civil servant as his appointment order was issued for one year of contract, hence the learned Tribunal has no jurisdiction in instant matter.
- I. That the appellant was found guilty of fraud and as per serial No.7 of the terms and conditions mentioned in appointment orders, the competent authority dismiss his contract of appointment in accordance with law.
- J. That no departmental appeal was preferred within specified period nor has this appeal been filed within the prescribed period, hence instant appeal being time barred is liable to be dismissed.

REPLY ON FACTS:

1. That Para No.1 is incorrect to the extent of permanent residence of appellant. The appellant has dual domicile one from union council Kot Kashmir, Tehsil Sarai Naurang and other is prepared after due date with address of Mohallah Mina Khel, Lakki Marwat. It is pertinent to mention that the appellant has concealed the fact about previous / original domicile with address of union council Kot Kashmir.
2. That Para No. 2 has no concern with respondents, hence need no reply.
3. That Para No.3. It is submitted that union council wise PST posts were advertised where against the appellant applied for the post of PST in union council Lakki-I along with the copy of domicile, with address of Mohallah Mina Khel, Lakki Marwat and succeeded to get appointment order. It is pertinent to mention that the appellant at the time of interview provided copies of two domiciles No.3110 dated: 25-06-2015 and No.5538-A dated: 09-08-2022 and stated that original domicile No.3110 dated: 25-06-2015 was lost and then he obtained second domicile bearing No.5538-A dated: 09-08-2022 but he cheated with the department as the previous original domicile No.3110 dated: 25-06-2015 bearing the address of U/C Kot Kashmir Tehsil Sarai Naurang, while the appellant applied for the post of U/C Lakki-I, Tehsil Lakki Marwat. **(Copy of appointment order-A)**
4. That Para No.4 pertains to record.
5. That Para No.5 also pertains to record.
6. That Para No.6. It is submitted that one Shahzaib resident of U/C Lakki City-I, who got the 5th position in merit list and was left from the appointment due to appellant's appointment being 4th in merit list, file a complaint dated: 01-06-2023 against appellant, wherein it was alleged that the appellant played fraud with the department by fabricating his address and union council in the copy of previous domicile, whereon the competent authority as caution stopped the

salary for initiation of proper inquiry. **(Copy of complaint is Annexure-B)**

7. That Para No.7. It is submitted that the appellant was well informed by the concerned authority about the complaint and allegation leveled against him. The copy of complaint is already mentioned and annexed above.
8. That Para No.8. It is submitted that the appellant is concealing the procedure and inquiry about his personal hearing, verification of both domicile through Assistant commissioner etc. The actual facts are that the appellant after receiving complaint against appellant, the competent authority / D.E.O Lakki Marwat has issued letter No. 6960 dated: 07-09-2023, for verification of domicile certificate to Assistant Commissioner Lakki Marwat. The Assistant Commissioner Lakki Marwat conducted inquiry wherein it was found that the appellant both domiciles were different as prior one has the address of U/C Kot Kashmir Tehsil Sarai Naurang and the second one has the address of U/C Lakki-I and requested to initiate criminal proceeding u/s 419/40/182-PPC against appellant. After receiving the above said copy, the competent authority constituted a committee for personal hearing and appellant was directed to appear before committee. The appellant appears before committee and a proper questionnaire was given to him where against he submitted his written reply / answers but fails to justify holding two domiciles with different addresses prior one holding address of union council Kot Kashmir and second one having the address of U/C Lakki-I. Thereafter the committee recommended the dismissal of appellant from service and recovery of salary and all the allowances and on the recommendation of inquiry committee the appellant's appointment contract was dismissed vide order dated: 25-09-2023 and recovery of salaries etc was also ordered. **(Copy of letter to Assistant Commissioner for verification of appellant's domiciles is Annexure-C, Copies of Letter No.305/AC/LM dated:14-09-23, report of Domicile Clerk and both domiciles are Annexure-D, E, F & G Copy of notification for constitution of personal hearing Committee is Annexure-H, Copy of order of personal hearing is Annexure-I, Copy of attendant of appellant at the**

time of hearing is Annexure- J, Copy of questionnaire and reply are Annexure-K & L, Copy of finding of inquiry Committee and order dismissal of appellant's appointment contract are Annexure-M & N)

9. That Para No.9. It is submitted that proper inquiry was conducted against the appellant, wherein he appeared and submitted his reply and thereafter the appellant's appointment contract was dismissed. It is pertinent to mention here that no show cause is needed firstly because the allegations were proven against the appellant for fabricating the address in the prior Domicile Certificate No.3110 dated: 25-06-2015 and secondly the appellant was appointed on contract basis and his service was not yet converted to permanent, hence he had not attained the status of being civil servant at the time of dismissing his appointment contract.
10. That Para NO.10 pertains to record.
11. That the instant appeal is illegal and filed to pressurize the Department, therefore is liable to be dismissed.

REPLY ON GROUNDS:

- A) That Para A is incorrect. The subject order is correct and is according to law and procedure. The competent authority dismissed the appointment contract of appellant after full satisfaction about the cheating of appellant whereby he fabricated his address and union council in prior domicile certificate No.3110 dated: 25-06-2017 from U/C Kot Kashmir to U/C Lakki-I and obtained a post of PST of union council Lakki-I. It is pertinent to mention that due to appellant's cheating the well eligible and deserving candidate namely Shahzaib was left from being appointed.
- B) That Para No. B. It is submitted the annexed birth certificate has no legal value as the said birth certificate was prepared after many years of appellant's birth. Moreover, the said birth certificate cannot disprove the fabrication of prior domicile certificate, obtaining second domicile certificate by submitting fake affidavit


stating that he has never acquired any domicile. The appellant acquires the second domicile without cancelling the previous domicile and with changed address just to obtain seat of PST of U/C Lakki City-I.


- C) That Para No. C. It is submitted that the appellant himself acquired prior domicile certificate No.3110 dated; 25-06-2015, wherein he himself stated his union council Kot Kashmir Tehsil Sarai Naurang, hence he could not take advantage of his own wrong.
- D) That Para No. D is incorrect. The PST posts were advertised on union council based and application were called from the candidates of concerned union council.
- E) That Para No. E. It is submitted that the appellant admitted in this para that the appointment was made union council based. Moreover, the appellant committed fraud with the department and fabricated his prior domicile by tempering his address and union council from U/C Kot Kashmir Tehsil Naurang to U/C Lakki-I Tehsil Lakki. At the time of appointment, it was mentioned in the appointment contract at serial No.7 that the competent authority could terminate or dismiss the contract if the documents found fabricated or ineligible, hence the appointment contract was dismissed.
- F) That Para No. F. That it is already stated above that the appellant at the time of interview the appellant submitted copy of prior / first domicile No.3110 dated: 25-06-2015 and stated that his original domicile is lost therefore he requested for duplicate domicile but in actual, the appellant's prior domicile was of U/C Kot Kashmir and thereafter obtained second domicile with address of U/C Lakki-I just to secure post of U/C Lakki-I. The appellant is guilty of fraud, tempering legal document. It is pertinent to mention that the teachers are the most important pillar of our society and fraud people like appellant could not be trusted to play with students' future.
- G) That Para No.G is incorrect. The complaint was filed by Mr. Shahzaib against dual domicile of appellant, which copy is already

annexed. Moreover, for initiation of inquiry, any complaint is not mandatory, the competent authority by himself could initiate the inquiry in case of any kind of fraud or misconduct. In the present case a property inquiry was conducted and proof of dual domicile with different addresses was given by the concerned authority i.e Assistant Commissioner Lakki Marwat, hence the contract of appellant's appointment was dismissed.

- H) That Para No. H is incorrect. The appellant was treated in accordance with law and policy. The appellant was guilty of fraud by tempering his address in prior / first domicile from U/C Kot Kashmir to U/C Lakki-I and withheld a deserving candidate from U/C Lakki-I.
- I) That Para No. I. It is submitted that the first / prior domicile is of U/C Kot Kashmir and the second domicile is acquired by the appellant after due date, hence the appellant's second domicile could not be considered for his appointment. In the appointment process on U/C based, the basic document is domicile and at the time of applying the appellant was not having domicile of Union Council Lakki-I. The appellant is not entitled to be re-instated.
- J) That Para J. That the counsel of the respondents may please be allowed to raise further points at the time of the arguments.

It is, therefore, most respectfully prayed that the appeal of the appellant may kindly be dismissed with special compensatory costs coupled with expenses of litigation.


 Samina Altaf
 Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar.
 (R.No.2)


 Zahoor Khan
 District Education Officer
 (M) Lakki Marwat
 (R.No.3)

7

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR**

Service Tribunal Appeal No. 267 of 2024

Hazrat Bilal

Versus

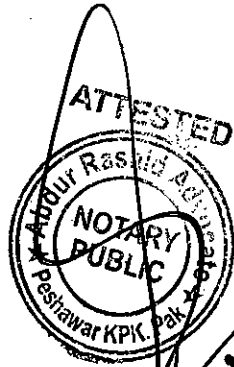
Secretary Elementary & Secondary Education, KP and others

AFFIDAVIT

I, Zahoor Khan, District Education Officer Male Lakki Marwat, do hereby solemnly affirm and declare upon oath that the contents of the accompanied written reply are true and correct to the best of my knowledge and belief and nothing has been intentionally concealed from this Hon'ble Tribunal. It is further added on oath that in this appeal the answering respondent have neither been placed ex-parte nor their defense have been struck off.

Deponent

**Zahoor Khan
District Education Officer (M)
Lakki Marwat**



13/5/24

(Annex - A)

OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE LAKKI MARWAT

Ph & Fax: (0969)530291, Email: emislakki@yahoo.com, Facebook: www.facebook.com/dcomalelakki

A

8

APPOINTMENT ORDER.

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

SUB-DIVISION LAKKI MARWAT

1. Union Council: Abba Khel

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
1.	9426262	MUHAMMAD NOUMAN S/O GUL REHMAN	14-08-1997	11201-0816377-1	140.21	GPS LALA KHEL ABBA KHEL
2.	951065	KHALID USMAN S/O ABDUR RAHMAN	14-08-1994	11201-9334484-1	133.90	GPS MIRZALI SHAH ABBA KHEL
3.	947612	SHARIF ULLAH S/O YAQOOB KHAN	11-04-1989	11201-6391963-3	132.01	GPS NO.1 ABBA KHEL
4.	951307	INAM ULLAH S/O GUL BAD SHAH	03-02-1997	11201-9644812-5	131.63	GPS SHERI KHEL ABBA KHEL
5.	943291	NAVEED ULLAH S/O GU MUHAMMAD KHAN	21-06-1997	11201-1829026-1	130.61	GPS NO.2 ABBA KHEL
6.	948040	ASLAM KHAN S/O BAHADER ZAMAN	30-03-1994	11201-6978238-9	130.13	GPS TALL KHAN ABBA KHEL
7.	944082	ASIF ULLAH KHAN S/O MUHAMMAD YOUSAF KHAN	03-06-1998	11201-1301094-9	129.63	GPS MIRZALI SHAH ABBA KHEL
8.	945597	FARMAN ULLAH KAHN S/O GUL BEG KHAN	30-03-1998	11201-5383822-5	128.08	GPS MOHALLA SHAH SAHIB ABBA KHEL
9.	943968	ASIF QADIR S/O GHULAM QADIR	22-03-1992	11201-2895622-3	127.97	GPS WANDA ZERAN ABBA KHEL

2. Union Council: Ahmad Khel

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
10.	945133	SHAFI UR RAHMAN S/O MUHAMMAD AYUB KHAN	01-03-1999	11201-4677990-7	135.33	GPS NO.1 AHMAD KHEL
11.	951462	SHAFQAT ULLAH KHAN S/O INAYAT ULLAH KHAN	05-04-1995	11201-9859772-3	130.48	GPS DHODA NO.1
12.	945387	MUHAMMAD MUNIR KHAN S/O ALLAH DAD	08-03-1998	11201-15091356-7	129.28	GPS DHODA NO.1
13.	944982	IHSAN ULLAH KHAN S/O KHUMD ULLAH JAN	01-03-1995	11201-4430619-1	129.38	GPS DHODA NO.3
14.	942697	YASEEN KHAN S/O MANZOOR KHAN	21-10-1993	11201-0931257-7	126.35	GPS WANDA LANGER KHEL SUR BAND
15.	943659	ABDUL WADOOD KIIAN S/O SYED MUHAMMAD	02-03-1997	11201-2405995-7	123.96	GPS SHAH HASAN KHEL NO.2
16.	947893	IMDAD ULLAH KHAN S/O NOOR MUHAMMAD KHAN	05-06-1998	11201-6777817-3	121.86	GPS DHODA NO.1
17.	945381	NAZEER ULLAH KHAN S/O AMAN ULLAH	15-02-1995	11201-5076862-1	120.48	GPS DHODA NO.2
18.	952493	NAVEED IQBAL S/O ABDUL MAJEED	06-04-1998	17301-8950406-5	119.86	GPS WANDA KUTANA

[Handwritten Signature]

9

5. Union Council.....Isak Khel

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
65.	951207	RIZWAN ULLAH S/O FAIZ ULLAH	05-04-97	11201-9530655-3	142.44	GPS NO.3 NAWAR KHEL
66.	944730	SAEED AHMAD S/O JAN MUHAMMAD	12-05-1998	11201-4096669-3	138.81	GPS NO.1 ZANGI KHEL
67.	948039	ANEES UR REHMAN S/O ABDUL GHAFOR	01-04-1999	11201-6976528-7	138.22	GPS NO.1 ZANGI KHEL
68.	944482	MUHAMMAD SOHAIL S/O ASLAM KHAN	02-02-1996	1120136482491	137.35	GPS NO.2 ZANGI KHEL
69.	949347	WAJID ULLAH KHAN S/O KHAN SARDAR	02-04-1998	1120188836087	135.26	GPS NO.1 DAULAT KHEL
70.	943260	ABDUL WAHEED S/O HAYAT ULLAH KHAN	24-02-1987	1120117819031	131.35	GPS NO.2 NAWAR KHEL
71.	948770	TAHIR NAWAZ S/O DIL NAWAZ KHAN	15-04-1999	1120180616135	130.31	GPS NO.1 DAULAT KHEL
72.	943339	RAHAT ULLAH S/O REHMAT ULLAH KHAN	13-03-1991	1120118911433	130.22	GPS NO.2 ZANGI KHEL
73.	943416	SALMAN WARIS S/O WARIS KHAN	15-03-1997	1120120180783	129.47	GPS ISAK KHEL NO.2
74.	948279	RIZWAN ULLAH S/O OBAID ULLAH JAN	05-15-1994	1120173298509	128.65	GPS NO.4 ZANGI KHEL
75.	949396	NAQEEB ULLAH KHAN S/O MUHAMMAD ALI KHAN	02-05-1993	1120189544127	128.48	GPS KOHI KILLA ISAK KHEL NO.3
76.	944711	MUHAMMAD NOAMAN S/O INAYAT ULLAH KHAN	07-03-1995	1120140648583	128.14	GPS NO.2 NAWAR KHEL
77.	943652	MISBAH ULLAH S/O SHARIF ULLAH KHAN	28-12-1996	1120124008753	126.92	GPS NO.4 ZANGI KHEL
78.	948084	KARIM NAWAZ S/O AZIZ KHAN	15-08-1992	1120170424201	126.69	GPS WANDA AHMAD KHEL
79.	948019	MUHAMMAD RIZWAN KHAN S/O MUHAMMAD JAVED KHAN	26-05-1993	1120169505295	126.28	GPS NO.3 DAULAT KHEL JADID ABADI
80.	948380	TANVEER IQBAL S/O MUHAMMAD IQBAL	05-03-1999	1120174589947	126.23	GPS NO.3 DAULAT KHEL JADID ABADI
81.	942392	TAHIR NAWAZ S/O MUHAMMAD NAWAZ	01-05-1994	1120104482419	126.15	GPS NAWAR KHEL NO.1
82.	947458	SADDAM HUSSAIN S/O RAEES KHAN	20-02-1995	1120161666599	125.84	GPS CHUNAI MASTI KHEL

6. Union Council.....Lakki

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

7. Union Council.....Lakki

S.#	ETEA Roll #	Name & Father's Name of Candidate	Date of Birth	CNIC #	Merit Position	Place of Posting
86.	944582	MUHAMMAD INAM ULLAH S/O MUHAMMAD YAQOOB	01-05-1994	1120138246543	138.83	GPS RAILWAY JUNCTION
87.	944213	MUHAMMAD ARIF ULLAH S/O ABDULLAH JAN	08-09-1996	1120132768733	137.65	GPS JAN ABAD LAKKI
88.	944666	WASI ULLAH S/O SHER AFZAL	07-03-1998	1120139853527	134.26	GPS NO.1 KHOIDAD KHEL

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

10

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

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

S.#	Name of Union Council	Name of Candidate with Father's Name	CNIC #	Date of Birth	Period for which relaxation is granted
1.	Mash Masti Khani	MUHAMMAD NAWAZ KHAN S/O HUKAM KHAN	1120162131207	15-03-1985	01 Year, 9Months & 16 Days
2.	Mela Shahab Khel	FARHAD ALI S/O NAIK MUHAMMAD	1120168358401	24-03-1986	01 Year, 9Months & 7 Days
3.	Bakhmal Ahmad Zai	NAUSHAD KHAN S/O GUL MUHAMMAD	1120186691835	28-02-1986	00 year , 10Months & 3Days
4.	Takhti Khel	LUQMAN E HAKEEM S/O RAHAM DIL KHAN	1120195611681	09-03-1985	01 Years, 9Months & 22 Days

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

Endst: No. 5495-5506 /Apptt:PST/2022 Dated. 06/10/2022

Copy forwarded for information to the: -

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

(Signature)
District Education Officer
(Male) Lakki Marwat

(Annex - B) بخدمت جناب SDEO مردانہ لکی مروت

عنوان: ماسٹر حضرت بلال پرائمری سکول میناخیل ڈومیسائل تصدیق

جناب عالی!

گزارش ہے کہ مسائل یونین کونسل کی نمبر 1 کا مستقل رہائشی ہے۔ مسائل ایک تعلیم یافتہ گھرانے سے تعلق رکھتا ہے۔ سال 2022

میں آپ کے محکمے نے اخبار میں خالی اسمیوں کا اشتہار دیا تھا۔ جس کیلئے مسائل نے بھی درخواست جمع کیا تھا۔ اور مسائل اپنے یوسی میں

5th پوزیشن پر آ گیا تھا۔ جبکہ مسائل کے یوسی میں کل چار سیٹیں تھیں۔ جس میں حضرت بلال ٹاپ پر تھا۔ انٹرویو کے دن ڈومیسائل کے طلب

کرنے پر اس نے ڈومیسائل گم ہونے کا روز نامہ پیش کیا اور بعد میں دوسرا ڈومیسائل بنا کر اپنا کام چلایا، اور وہ بھرتی بھی ہو گیا لیکن اس

بندے نے محکمہ کو دھوکہ دے کر ہمارا حق مارا ہے۔

اس بندے کا ڈومیسائل بگس تھا۔ اس بندے کے پاس دو ڈومیسائل ہیں۔ جس میں ایک لکی ٹی 1 کا ہے اور ایک کسی دوسرے یونین کونسل کا

ہے۔

لہذا آپ صاحبان سے التماس ہے کہ اس بندے کے دونوں ڈومیسائل کی تصدیق کی جائے اور غلط ثابت ہونے پر حکمانہ کارروائی

بھی کی جائے۔

بڑی مہربانی ہوگی۔

موریہ: 01-06-2023



العارض

شیاد زیب خان ولد فضل ربی خان لکی UC ون تحصیل ضلع لکی مروت



OFFICE OF THE
DISTRICT EDUCATION OFFICER MALE LAKKI MARWAT

Phone & Fax: (0969) 538291, Email: emislakki@yahoo.com,
Facebook: www.facebook.com/deomalelakki, Twitter: www.twitter.com/deo_m_lakki

No. 6960 Misc

(Annex-C)

Dated: 07/09/2023

To

The Assistant Commissioner
Lakki Marwat.


Subject: VERIFICATION OF DOMICILE CERTIFICATE

It is submitted that the office of undersigned had appointed one Mr. Bilal s/o Khalil ur Rehman against the post of primary school teacher. During the process of appointment the cited teacher has provided two copies of domicile certificates issued by the competent authority with bearing No.5538 dated- 29-08-2022 and 3110 dated.25-06-2015.

During scrutiny of documents, the above cited teacher verbally claimed that domicile issued vide No.3110 dated-25-06-2015 has misplaced from him and then he obtained a duplicate domicile certificate.

Keeping in view the above you are requested to,

1. Please provide attested copy (both sides) of both domicile certificates issued vide No.3110 dated 25-06-2015 and No. 5538 dated 29-08-2022.
2. Please clarify whether or not the domicile certificate, issued vide No-3110 dated-25-06-2015, is still intact or cancelled. If cancelled, please provide cancellation notification issued by the competent authority.
3. Please clarify the union council of holder (Mr Bilal s/o Khalil ur Rehman) as per domicile certificates bearing No. 3110 dated 25-06-2015 and No. 5538 dated 29-08-2022.


District Education Officer
(Male) Lakki Marwat





OFFICE OF THE
ASSISTANT COMMISSIONER (H.Q.)
LAKKI MARWAT

☎ 0969-510518
☎ 0969-512148
@ ad@lakkiarwat.gov.punjab

(42)
(13)

No.

312/AC/LM

Dated: 20/09/2023

To

The District Education Officer
(Male) Lakki Marwat

(Annex-D)

Subject:

DUPLICATION OF DOMICILE CERTIFICATES.

Memo

Reference your office letter No. 6960/Misc dated 07.09.2023 on the subject cited above

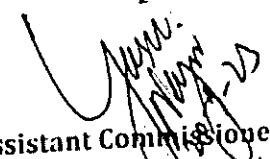
It is stated that one Mr. Hazrat Bilal son of Khalil-ur-Rehman Resident of Kot Kashmir (Union Council Kot Kashmir) Tehsil Naurang District Lakki Marwat had applied for issuance of Domicile Certificate to which the Domicile Certificate has been issued vide No. 3110 dated 25.06.2015 (Attested copy is enclosed).

In the year 2022 the said applicant Mr. Hazrat Bilal again applied for issuance of Domicile Certificate with the permanent address Mohallah Ayan Town Lakki City (Union Council Lakki-I) Tehsil & District Lakki Marwat which was issued vide No. 5833-A dated 29.08.2022 without the surrender/ cancellation of his old Domicile certificate i.e. 3110 dated 25.06.2015. (Attested copy enclosed for ready reference). In this regard the Domicile Clerk was asked for verification / authentication of domicile certificate. The attested copy of his report is attached herewith.


Assistant Commissioner
HQrs Lakki Marwat

Even No & Date.

Copy forwarded to the Deputy Commissioner Lakki Marwat for information please


Assistant Commissioner
(HQrs) Lakki Marwat



(Annex - E)

(14)

جانب عالی

گزارش منظور اور ہے کہ بحال چینی انگریزی نمبر 3011/AC/LM مورخہ 08.09.2023 بت اور پبلیکیشن اور میسج سرٹیفیکٹ مندرجہ

ذیل معروض ہوں

نمبر	نام محلہ و سکونت و زمین کو فصل	جاری کرو نمبر	شناختی کارڈ نمبر ڈومیسائل جاری ہوا	قدیم شناختی کارڈ نمبر	کیفیت
1.	حضرت بلال ولد ظہیر الرحمن سکھ کوٹ کشمیر یونین کوٹس کوٹ کشمیر	3110 مورخہ 25.06.2015	11201-5539052-7	11201-0726753-5	ریکارڈ موجود ہے اور کینسل نہیں ہے
2.	تسکتیہ ولد یعقوب خان سکھ بہرام نیشنل یونین کوٹس بہرام نیشنل	نمبر 5538 مورخہ 29.08.2022	-	11201-2714198-3	ریکارڈ موجود ہے اور کینسل نہیں ہے
3.	حضرت بلال ولد ظہیر الرحمن سکھ آیان ٹاؤن ریٹائیل یونین کوٹس گئی مٹی نمبر 1	5538 مورخہ 29.08.2022	11201-0726753-5	-	ریکارڈ موجود ہے اور کینسل نہیں ہے

جانب عالی

گزارش ہے کہ مزید وضاحت کی جاتی ہے کہ سلسلہ نمبر 3 پر حضرت بلال کا ڈومیسائل نمبر 8-5538 مورخہ 29.08.2022 درج ہوا ہے یعنی
کہ سلسلہ نمبر 5538 اور بھی ڈومیسائل درج ہوئے ہیں۔ جبکہ متذکرہ ڈومیسائل سرٹیفیکٹ بحال بدستور ریکارڈ میں موجود ہیں اور کوئی بھی ڈومیسائل منسوخ نہیں
ہوا ہے۔ حضرت بلال ولد ظہیر الرحمن کی ڈومیسائل کاپی ہمراہ ہے۔

Handwritten notes and signatures in the middle section of the page.

Handwritten signature and stamp of a government official, dated 20-8-23.

Handwritten signature at the bottom right of the page.

Handwritten signature: Hazrat Bilal

KKI



DOMICILE CERTIFICATE



I HAZRAT BILAL Son / Daughter / Wife of Khalil ur Rahman, declare that I was born of parents who are permanently Domiciled in Khyber Pakhtunkhwa having been born / settled in this province.

I belong by birth to Mohallah _____
Village Kot Kashmir Tehsil Lakki Marwat
District Lakki Marwat.

Self / Father / Brother / Husband CNIC No.

1	1	2	0	1	-	5	5	3	9	0	5	2	-	7
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

HAZRAT BILAL
Signature of the Applicant
Dated: / / 2015

Pursuance to the declaration dated: / / 2015 filed by HAZRAT BILAL Son / Daughter / Wife of Khalil ur Rahman domicile in the Khyber Pakhtunkhwa, it is hereby certified that the said HAZRAT BILAL is born of parents who are permanent residents of the Khyber Pakhtunkhwa having been born / settled in it.

I have satisfied my self from ~~personal~~ knowledge / verification through Revenue Staff that the above declaration is true & certified accordingly.

This 25 day of 06 2015



Add: Assistant-Commissioner
Lakki Marwat

No. 3110 / DC / LM- Dated: 25 / 06 / 2015

SABZ ALI
Seal of Court

Attested
11/08/2015

COUNTERSIGNED
Deputy Commissioner
Lakki Marwat

(نوٹ) درج ذیل رپورٹ پٹواری حلقہ اپنے قلم سے خود پر کریں۔

جناب عالی!

تصدیق کی جاتی ہے۔ کہ متسی / اسماۃ _____ حضرت بلال
ولد / دختر / زوجہ _____ ضلع لکی مروت قوم _____ صرورت
خود اور اس کے والدین محلہ _____ گاؤں کھوٹ کشمیر
تخلیل _____ لکی صرورت ضلع لکی مروت کے مستقل رہائشی و پیدائشی باشندگان ہیں۔
اور ایف۔ آر سے کوئی تعلق نہیں رکھتے۔ لہذا رپورٹ عرض ہے۔

محمد امجد علی
کی پٹواری حلقہ 15-6-15

Respected Sir,
Mr. Khalid bin Lehman
is not police official.

SM
DEPT. CHANISAN
14/11/15

Attested as verified by the Revenue Staff

تصدیق شد
محمد امجد علی
گرو اور سرکل

Attested as verified by the Revenue Staff

Tehsildar / Naib Tehsildar

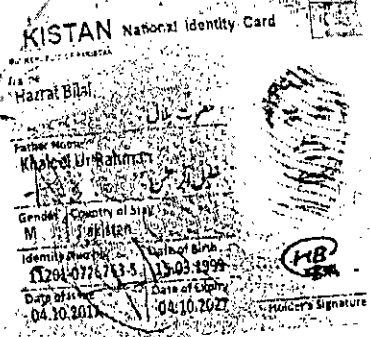
Attested as per
record available
with Domulla
11/09/15

Attested
محمد امجد علی
DEPT. CHANISAN
14/11/15

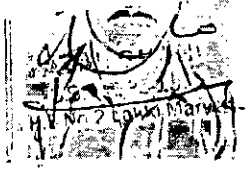
(Annex-G)

G

16



STATE OF DOMICILE



Under the Pakistan Citizenship Act, 1951 (Act, II of 1951)
Rules made thereunder (vide Rule No.23)

I HAZRAT BILAL Son / Daughter / Wife
of KHALEEL UR RAHMAN hereby declare that I was born of parents who are
permanently Domiciled in Khyber Pakhtunkhwa Province, having belonged to it by birth/
settled in it.

I belong to Village / Mohallah AYAN TOWN MINA KHAIL LAKKI
Tehsil LAKKI District Laicki Marwat.

Signature / Thumb Impression of the Applicant

Name in Block Letters HAZRAT BILAL

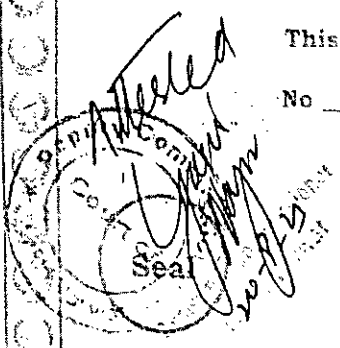
Dated: _____

Pursuance to the declaration dated: _____ / _____ /20 _____ filed by
Mr/Mrs/Miss HAZRAT BILAL S/O, D/O, W/O KHALEEL UR RAHMAN
CNIC No 11201-0726753-5 domiciled in the Khyber Pakhtunkhwa
Province. It is hereby certified that the said HAZRAT BILAL
is born of parents who are permanent residents of Khyber Pakhtunkhwa Province having
belong to it by birth / settled in it. I have satisfied myself personally / through my
relevant sources that the above declaration is true and duly certified overleaf.

This 29 day of 08 - 2022

No SS 38-A dated 29-08-2022

COUNTERSIGNED BY



Deputy Commissioner / Assistant Commissioner

11-09-2023

101

اس بات کی تصدیق کرتا کرتی ہوں کہ اس سے پہلے میں نے کسی بھی ضلع کو ڈومیسائل سرٹیفکیٹ حاصل نہیں کیا ہے۔

موبائل نمبر 9128986-0342، پتہ/پتہ انٹرنیٹ: MBSA

ولد اختر ازبجہ خلیل الرحمن قوم سروٹ حضرت اللہ مغلہ تریان ٹاؤن مینارل

گاہن اشرف مکیرت تحصیل مہارٹ ضلع گلگت مروت کا اکی رہائشی ہے اور اس کے والدین اشوہر بھی علاقہ مذکورہ کے رہائشی و پیدائشی باشندگان ہیں اور اچھے پاکستانی ہیں۔ میں اس کو ذاتی طور پر جانتا جانتی ہوں۔

نام RAZAL MAHAR دستخط Razal پتہ Sus t کیپیڈراؤڈ ڈسٹریکٹ کارڈ نمبر

تاریخ 12/11/2022 11-2011-0813694-1

(Handwritten signature)

291 *(Handwritten number)*

ڈومیسائل سرٹیفکیٹ کے حصول کیلئے ضروری شرائط

- ڈومیسائل سرٹیفکیٹ حاصل کرنے کے لئے عمر کی کوئی حد نہیں بلکہ امیدوار کسی بھی وقت اور کسی بھی کلاس میں زیر تعلیم کیوں نہ ہو اس سرٹیفکیٹ کے لئے اہل ہوتا ہے۔
- والدین کو چاہئے کہ وہ اپنے بچے کے ڈومیسائل بر وقت بنوائے۔
- ایک سے زیادہ ڈومیسائل رکھنا ناجائز ہے۔
- ایک ایسے دار ایک وقت میں صرف ایک ڈومیسائل بنوانے کا حقدار ہے۔
- جس امیدوار کے پاس ایک سے زیادہ ڈومیسائل سرٹیفکیٹ موجود ہوں ان کو چاہئے کہ وہ فوری طور پر ان میں سے صرف ایک اپنے پاس رکھیں جس کا وہ قانونی طور پر حقدار ہو۔ باقی تمام سرٹیفکیٹس امیدوار کا حقیقی طور پر جس ضلع سے تعلق ہو اسی ضلع کا ڈومیسائل سرٹیفکیٹ اپنے پاس رکھنے کا حقدار ہے۔ اگر کوئی ایک سے زیادہ رجسٹرڈ ڈومیسائل رکھنے کے خواہم میں پایا گیا تو صرف اس امیدوار کے خلاف بلکہ اس کے والدین اور تصدیق کنندہ کے خلاف بھی قانونی کارروائی کی جائے گی۔

ڈومیسائل سرٹیفکیٹ فارم میں ایسے گئے کوائف کی تصدیق مندرجہ ذیل افسروں/ اشخاصیات میں سے کسی ایک سے کرانا لازمی ہے۔ امیدوار کی صورت کو مد نظر رکھتے ہوئے ڈومیسائل سرٹیفکیٹ کی تصدیق کیلئے حکومت نے (9) کلاسز کا تعین کیے ہیں جن میں سے کسی ایک سے تصدیق کی جاسکتی ہے۔

سینیئر زکین قومی آسٹری زکین سوہانی آسٹری زکین قومی آسٹری زکین سوہانی آسٹری زکین قومی آسٹری زکین سوہانی آسٹری
گریڈ آفیسر (BPS-17 / BPS-16)

امیدوار کو چاہئے کہ اپنا حقیقی وقت بچانے کیلئے جلد از جلد ڈومیسائل سرٹیفکیٹ حاصل کرے تاکہ یہ ٹرک کا امتحان پاس کرنے کے بعد انہیں ڈومیسائل کے حصول کیلئے انتظار اور رش کا سامنا نہ کرنا پڑے۔



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

Ph: (0969)538291 email: emlslakki@yahoo.com
www.facebook.com/deomale Lakki, www.twitter.com/deo_m_lakki

No. 7216 /Misc Dated. 16 / 09 / 2023.

OFFICE ORDER:

The undersigned, being the competent authority, is pleased to constitute the following two member committee to conduct personal hearing of Mr Hazrat Bilal PST Government Primary School No. 2, Mina Khel (Mandar) Lakki Marwat along with Sub Divisional Education Officer Male Lakki Marwat in the office of the undersigned on 18th September 2023 (Monday) at 02:00 PM

1. Mr Muhammad Ilyas Khan, DEO Male Lakki Marwat
2. Mr Gul Faraz, Deputy DEO Male Lakki Marwat

District Education Officer
(Male) Lakki Marwat

Even No. & Date

Copy to the;

1. Director E&SE Khyber Pakhtunkhwa Peshawar
2. Deputy Commissioner Lakki Marwat
3. Members of Committee

District Education Officer
(Male) Lakki Marwat

(Annex - I)

I (18)

(22)



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

Phone & Fax: (0969)538291, Email: emislakki@yahoo.com
www.facebook.com/deomaleLakki, www.twitter.com/deo_m_lakki

To

No. 7215 /Misc Dated: 16/09/2023

The Sub Divisional Education Officer
(Male) Lakki Marwat

Subject: **Personal Hearing**

It refers to the subject quoted above and to ask you to inform Mr Hazrat Bilal PST S/O Khalil-ur-Rehman GPS No. 2, Mina Khel Lakki Marwat to attend the office of the undersigned along with you in connection with his personal hearing on 18th September 2023 (Monday) at 02:00 PM. He shall bring the following original academic and professional and other relevant documents/credentials with him.

1. Secondary School Certificate (SSC)
2. Higher Secondary School Certificate (HSSC)
3. BA/BSc Degree
4. MA/MSc Degree
5. Other Academic/Professional documents if any
6. CNIC
7. Father's CNIC
8. Domicile Certificate bearing No. 3110 dated 25-06-2015
9. Domicile Certificate bearing No. 5538 dated 29-08-2022
10. Copy of FIR regarding missing of Domicile Certificate


District Education Officer
(Male) Lakki Marwat

Even No. & Date

Copy to the,

1. Director E&SE Khyber Pakhtunkhwa Peshawar
2. Deputy Commissioner Lakki Marwat
3. District Monitoring Officer EMA Lakki Marwat


District Education Officer
(Male) Lakki Marwat

(Annex - J)




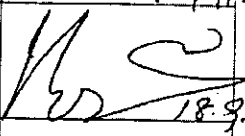
Office of The District Education Officer
Male Lakki Marwat

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

(19/9/23)

PERSONAL HEARING REGARDING DOMICILE CERTIFICATE
DEO (MALE) OFFICE DISTRICT COMPLEX TOWN TAJA ZAI TOWN

DATED: 18/09/2023

S.No	Name of Officers/ Official	Designation	Office/ School	Contract No	Signature
01	Hazrat Bilal	P.S.T	G.P.S No.2 Mina Khel	0342-91289 86	 18/9/2023
02	Ali. Rehman	SDBO (M) L/M	SDBO Office LM 9855253	0345-	 18.9.2023



- 1- آپ کا پورا نام، ولدیت اور پتہ
- 2- آپ کا قومی شناختی کارڈ نمبر (تصدیق شدہ نقل فراہم کریں)
- 3- آپ کے والد کا قومی شناختی کارڈ نمبر (تصدیق شدہ نقل فراہم کریں)
- 4- آپ کا رابطہ نمبر / سوبائل فون نمبر
- 5- آپ کی تقرری بطور پرائمری سکول ٹیچر یونین کونسل لگی دن میں ہوئی ہے۔ کیا یہ درست ہے؟
- 6- محکمہ تعلیم میں پرائمری سکول ٹیچر کی بھرتی یونین کونسل کی بنیاد پر کی جاتی ہے۔ آپ کی تقرری ڈومیسائل سرٹیفکیٹ کی رو سے یونین کونسل لگی دن میں ہوئی ہے؟ (ڈومیسائل سرٹیفکیٹ کی تصدیق شدہ نقل فراہم کریں)
- 7- یہ کہ آپ نے ایک بیان حلفی جمع کرایا ہے جس میں آپ نے اپنا ایڈریس کوٹ کشمیر ظاہر کیا ہے، آپ کے والد کے قومی شناختی کارڈ کے مطابق مستقل پتہ کوٹ کشمیر ہے۔ کیا یہ درست ہے؟
- 8- ریکارڈ کے مطابق آپ نے سال 2015 میں ڈپٹی کمشنر لگی مروت آفس سے بذریعہ نمبر 3110 تاریخ 25-06-2015 جو ڈومیسائل سرٹیفکیٹ حاصل کیا تھا اس میں آپ کی یونین کونسل کوٹ کشمیر درج ہے۔ یہی ڈومیسائل سرٹیفکیٹ آپ نے میٹرک کے بعد مزید تعلیم جاری رکھنے کے لئے استعمال کیا تھا لیکن آپ نے دانستہ طور پر یہ ڈومیسائل سرٹیفکیٹ محکمہ تعلیم لگی مروت کے انفران سے پوشیدہ رکھا، کیوں؟ (ذکورہ ڈومیسائل سرٹیفکیٹ کی تصدیق شدہ نقل فراہم کریں)
- 9- سال 2022 میں آپ نے ایک دوسرا ڈومیسائل سرٹیفکیٹ بسلسلہ نمبر A-5538 تاریخ 29-08-2022 حاصل کیا جس میں آپ کا ایڈریس محلہ آیان ناؤن لگی شٹی درج ہے، اسی ڈومیسائل سرٹیفکیٹ پر آپ کی پی ایس ٹی پوسٹ پر تقرری ہوئی۔ اس ڈومیسائل سرٹیفکیٹ کے حصول کے لئے آپ نے اپنا پہلا والا (سال 2015 میں جاری کردہ) ڈومیسائل سرٹیفکیٹ متعلقہ اتھارٹی سے پوشیدہ رکھا، کیوں؟ (ذکورہ ڈومیسائل سرٹیفکیٹ کی تصدیق شدہ نقل فراہم کریں)
- 10- آپ نے کوٹ کشمیر یونین کونسل کا ایک ڈومیسائل سرٹیفکیٹ ہوتے ہوئے دھوکہ دہی، فراڈ اور سرکاری اہلکاروں کی آنکھوں میں دھول جھونکتے ہوئے لگی دن یونین کونسل کا دوسرا ڈومیسائل سرٹیفکیٹ حاصل کیا تاکہ اپنے آپ کو پی ایس ٹی پوسٹ پر بھرتی کرا سکیں۔ آپ کیا کہنا چاہیں گے؟
- 11- کیا سال 2022 میں دوسرے ڈومیسائل سرٹیفکیٹ کے حصول کے لئے آپ نے پہلے ڈومیسائل سرٹیفکیٹ کی گمشدگی کی تھانے میں ایف آئی آر روزنامہ رپورٹ درج کرائی تھی؟ (نقل فراہم کریں)
- 12- یونین کونسل تبدیلی کی خاطر دوسرا ڈومیسائل بنوانے سے یہ صاف ظاہر ہوتا ہے کہ آپ کے پاس پہلا ڈومیسائل موجود تھا لیکن اس کے باوجود آپ نے اس کی گمشدگی ظاہر کی۔ اس بات میں کتنی حقیقت ہے؟
- 13- ایک یونین کونسل کا ڈومیسائل سرٹیفکیٹ ہوتے ہوئے آپ نے دھوکہ دہی اور فراڈ سے دوسری یونین کونسل کا ڈومیسائل حاصل کیا۔ اپنا موقف پیش کریں؟
- 14- کیا آپ اپنے دفاع میں مزید کچھ کہنا چاہتے ہیں؟ -----

Handwritten mark at the top center.

11201-0726753-5

Handwritten text in a circle, possibly "HR 8/11".



Handwritten text in Arabic script, possibly a title or header.

Handwritten text in Arabic script.

Handwritten text in Arabic script, starting with a circled number 6.

Handwritten text in Arabic script.

Handwritten text in Arabic script.

Handwritten text in Arabic script.

Handwritten text in Arabic script, starting with a circled number 8.

Handwritten signature or mark on the right side.

Handwritten text in Arabic script.

Handwritten text in Arabic script, starting with a circled number 7.

Handwritten text in Arabic script, starting with a circled number 6.

Handwritten text in Arabic script, starting with a circled number 5.

Handwritten text in Arabic script, starting with a circled number 4.

Handwritten text in Arabic script, starting with a circled number 3.

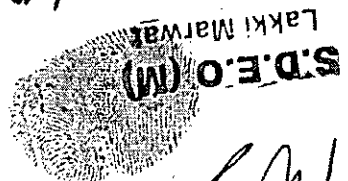
Handwritten text in Arabic script, starting with a circled number 2.

Handwritten text in Arabic script, starting with a circled number 1.

(Annex-2)

Handwritten text in Arabic script, possibly a signature or mark.

1201-0726753-5



Handwritten signature and initials, including 'HBS' in a circle.

Handwritten notes in Urdu, including a date '18/3/2023' and a signature.

Handwritten notes in Urdu, mentioning 'S.D.E.O (M) Lakki Marwat'.

Handwritten notes in Urdu, including a circled number '15'.

Handwritten notes in Urdu, including a circled number '13'.

Handwritten notes in Urdu, including a circled number '12'.

Handwritten notes in Urdu, including a circled number '11'.

Handwritten notes in Urdu, including a circled number '10'.

Handwritten notes in Urdu, including a circled number '9'.

Handwritten notes in Urdu, including a circled number '8'.

Handwritten notes in Urdu, including a circled number '7'.

(Annex-M)

(M)



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

Phone & Fax: (0969)538291. Email: emislakki@yahoo.com
www.facebook.com/deomalelakki, www.twitter.com/deo_m_lakki

**Minutes of Personal Hearing Committee in respect of Mr Hazrat Bilal PST, GPS
No. 2, Mina Khel Lakki Marwat**

Reference: District Education Officer Male Lakki Marwat letter No. No. 7215/Misc dated 16-09-2023.

Procedure:

We, the undersigned, conducted personal hearing of Mr Hazrat Bilal PST, GPS No. 2, Mina Khel Lakki Marwat at the district education offices located in DHQ Complex Tajazai on 18th September 2023. The above quoted official is facing charges of having double domicile certificates, one of Union Council Kot Kashmir and the other of Union Council Lakki City-1. Mr Hazrat Bilal-Ex-PST appeared before the personal hearing committee and he was given a questionnaire with direction to submit his reply. He was also interviewed in-depth about possession of two domicile certificates with separate/different addresses and union councils. In his reply to the questionnaire and during interview, Mr Hazrat Bilal PST failed to prove himself not guilty of possessing two domicile certificates with different and tempered address.

Findings/Conclusion:

After in-depth investigation, reply to questionnaire and interview, the committee is of firm belief that Mr Hazrat Bilal PST is in possession of two domicile certificates - one of Union Council Kot Kashmir and the other of Union Council Lakki City-1. In 2015, he obtained a domicile certificate bearing No. 3110 dated 25-06-2015, with the address of Village Kot Kashmir Union Council Kot Kashmir Tehsil Naurang District Lakki Marwat. He tempered the original address of Village Kot Kashmir UC Kot Kashmir Tehsil Naurang District Lakki Marwat with address of Mohallah Ayan Town UC Lakki City-1 Tehsil Lakki Marwat District Lakki Marwat.

In 2022, he again applied for domicile certificate which was issued to him vide No. 5538-A dated 29-08-2023, with the address of Mohallah Ayan Town Union Council Lakki City-I Tehsil Lakki Marwat District Lakki Marwat without surrendering/cancellation of old domicile certificate. Mr Hazrat Bilal claimed that he had lost original domicile certificate issued vide No. 3110 dated 25-06-2015 and then obtained another domicile certificate from competent forum bearing No. 5538-A dated 29-08-2022 after filing a report in daily diary (roznámchà) with local police. During investigation, it was revealed that he had tempered his permanent address in the photocopy of domicile certificate issued vide No. 3110 dated 25-06-2015, he produced at the time of interview in order to make it a true copy of the domicile certificate issued vide No. 5538-A dated 29-08-2022 so far as his permanent address is concerned. The domicile certificate bearing No. 5538-A dated 29-08-2022 was obtained after closing date of advertisement.

The committee reached the conclusion that Mr Hazrat Bilal obtained the domicile certificate bearing No. 5538-A dated 29-08-2023 with the address of Mohallah Ayan Town Union Council Lakki City-I Tehsil Lakki Marwat District Lakki Marwat through cheating and without surrendering/cancellation of his old domicile certificate. Thus he got employment

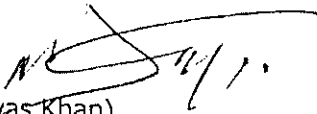
(Handwritten signature)

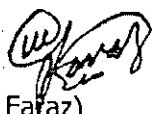
as Primary School Teacher BPS-12 in Education Department and drawn salaries from government exchequer through cheating. 24

Hazrat Bilal has fraudulently obtained two different domicile certificate issued vide No. 3110 dated 25-06-2015 and No. 5538-A dated 29-08-2023. He has provided domicile certificate issued vide No. 3110 dated 25-06-2015 with tempered address of Mohallah Ayan Town Union Council Lakki City-I Tehsil Lakki Marwat District Lakki Marwat though original address was Village Kot Kashmir UC Kot Kashmir Tehsil Naurang District Lakki Marwat.

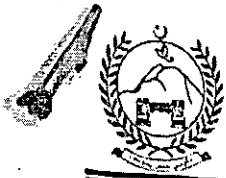
Recommendations:

1. The one year appointment contract of Mr Hazrat Bilal PST son of Khalil ur Rehman resident of Mohallah Ayan Town Union Council Lakki City-1 Tehsil Lakki Marwat District Lakki Marwat may be dismissed.
2. All kinds of salaries, allowances and other perks and privileges received by Mr Hazrat Bilal PST may be recovered through Deputy Commissioner Lakki Marwat.
3. The Deputy Commissioner Lakki Marwat may be requested to initiate legal/criminal action against Mr Hazrat Bilal under relevant sections of law for obtaining domicile certificate through cheating and getting employment on the basis of it.


(Muhammad Ilyas Khan)
District Education Officer
Male Lakki Marwat


(Gul Faraz)
Deputy DEO Male
Lakki Marwat





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

OFFICE ORDER:-

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

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

6. **AND WHEREAS**, the above letters proves that during appointment process the above ex-official has provided copy of domicile certificate bearing No. 3110 dated 25-06-2015 of UC Kot Kashmir with tempered permanent address of Mohallah Ayan Town UC Lakki City-1 Lakki Marwat, making himself eligible for appointment against the post of Primary School Teacher by cheating and to make the office of DEO Male Lakki Marwat to consider his both domicile certificates with permanent address of Mohallah Ayan Town of same union council (Lakki City-1).

7. **AND WHEREAS**, the above quoted teacher was provided an opportunity of personal hearing/cross examination of the evidence wherein he failed to satisfy committee members about his double domicile certificates of different union councils, tempering with permanent address and cheating the office of DEO Male Lakki Marwat to secure the job of PST (Primary School Teacher).

8. **AND NOW THEREFORE**, after having considered the charges and evidence on record and documents submitted by office of Assistant Commissioner (HQ) Lakki Marwat, the competent authority (District Education Officer Male Lakki Marwat) is of the view that the charges of possessing double domicile certificates, tempering with permanent address, cheating and concealment of facts have been proved true upon the ex-official and as per terms and conditions of appointment order No. 5495-5506 dated 06-10-2022 at S. No. 07, the competent authority (District Education Officer Male Lakki Marwat) is satisfied and is pleased to dismiss the appointment contract of Mr Hazrat Bilal Ex-PST Government Primary School No. 2, Mina Khel District Lakki Marwat with ab initio effect with recovery of salaries, allowances and perks and privileges equal to amount **Rs 263272/- (Rupees Two Lac Sixty Three Thousand Two Hundred Seventy Two)** from him.

District Education Officer
(Male) Lakki Marwat

Endst No. 7508-15 Dated. 25/09/2023.

Copy to the:-

- 1) Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2) Deputy Commissioner Lakki Marwat
- 3) District Monitoring Officer (EMA), Lakki Marwat.
- 4) District Accounts Officer, Lakki Marwat.
- 5) Deputy District Education Officer (Male) Local Office.
- 6) Sub Divisional Education Officer Male Lakki Marwat with directions to record necessary entry in his service book.
- 7) Primary School Head Teacher (PSHT) GPS No. 2, Mina Khel Lakki Marwat
- 8) Mr. Hazrat Bilal S/O Khalil ur Rehman, Ex-PST Resident of Ayan Town District Lakki Marwat.

District Education Officer
(Male) Lakki Marwat



**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
LAKKI MARWAT**

Phone & Fax: (0969)538291, Email: cmislakki@yahoo.com
www.facebook.com/deomalelakki, www.twitter.com/deo_m_lakki

AUTHORITY

Mr. Khamdullah jan Assistant Director I.T, O/O the District Education Officer (Male) Lakki Marwat is hereby authorized to Submit Reply in Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar in S.A 267/2024 Titled as Hazrat Bilal Versus Government of Khyber Pakhtunkhwa on behalf of the undersigned.

Mussarat Hussain
District Education Officer (M)
Lakki Marwat