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**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 416/2024**

Muhammad Ibrar, Senior Clerk (reverted to Junior Clerk Post) District  
Charsadda..... Appellant

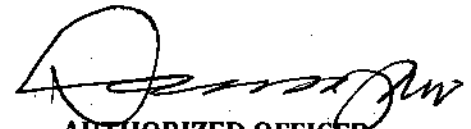
**VERSUS**

District Education Officer (M) Charsadda & others..... Respondents

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**SAMINA ALTAF  
DIRECTOR**



**AUTHORIZED OFFICER  
ABDUS SAMAD  
DEPUTY DIRECTOR**

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

①

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15/18

Dated 22/8/24

**Service Appeal No: 416/2024**

Muhammad Ibrar, Senior Clerk (reverted to Junior Clerk Post) District  
Charsadda..... Appellant

**VERSUS**

District Education Officer (M) Charsadda & others..... Respondents

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1 to 2.**

Respectfully Sheweth,

The Respondents submit as under.

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action and locus standi to file instant appeal before this Honorable Tribunal against the Respondents.
- 2 That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 3 That the appeal is not maintainable and even incompetent under the relevant provision of law & rules in vogue.
- 4 That the appellant is estopped by his own conduct to file the instant appeal against the Respondent Department.
- 5 That the appellant has not come to this Honorable Tribunal with clean hands and has also concealed material facts from the ambit of this Honorable Tribunal in the titled appeal.
- 6 That the appeal is bad for mis-joinder and non-joinder of necessary parties to the titled appeal.
- 7 That the appeal in hand is pre mature, hence, liable to be dismissed on the sole ground of maintainability under the rules.
- 8 That the appeal is barred by law & limitation.

ON FACTS:

- 1 That Para-1 pertains to the service record of the appellant against the senior clerk post in BPS-14 & has been reverted to the post of junior clerk on the grounds of the inquiry report submitted by the District Education Officer (M) Mohmand on dated 15-07-2023 with the contention that in utter violation of the procedure directed by the Govt: of KP Establishment Department vide letter No. SO(Policy) E&AD/1-3/2012/APT Rules dated 07-06-2023 & collusion with Mr. Abdur Rehman the then Junior Clerk in BPS-11 of the SDEO (F) Charsadda has been found involved/ guilty in issuance of fake & bogus letters bearing No. 1278 dated 05-05-2023 & other letter No. 1271 dated 05-05-2023 under the fake/scanned signatures of the Assistant Director (Estab/M-I) Local Director in connection with the retirement cases on medical ground basis of the following PSHTs in BPS-15 namely Noor Ullah Jan GPS Mian Sahib Gul Qilla Tangi & Muhammad Tayyab GPS Gul Khittab Korona District Charsadda as evident from the letter dated 27-09-2023 & Show Cause Notice *attached as Annex-A & B*.
- 2 That Para-2 is incorrect & denied on the grounds that the appellant has been found involved/ guilty in issuance of fake & bogus letters bearing No. 1278 dated 05-05-2023 & other letter No. 1271 dated 05-05-2023 under the fake/scanned signatures of the Assistant Director (Estab/M-I) Local Director in connection with the retirement cases on medical ground basis of the PSHTs in BPS-15 namely Noor Ullah Jan GPS Mian Sahib Gul Qilla Tangi & Muhammad Tayyab GPS Gul Khittab Korona District Charsadda as evident from the letter dated 27-09-2023 & Show Cause Notice, hence, the claim of the appellant is liable to be rejected.
- 3 That para-3 is correct that the appellant has been proceeded under the mandatory provision of Rule3 (c) & 3 (d). Rule-4(b)(i) & Rule-7 of E&D Rules, 2011 on account of his direct involvement in processing fake & bogus papers/documents for invalid pension on medical grounds of Noor Ullah Jan & Muhammad Tayyab PSHTs in BPS-15 of District Charsadda resulted in the nomination of the inquiry vide Notification No. 5579-82 dated 06-07-2023 through Mr. Liaqat Ali, the then District Education Officer (M) Mohmand who after threadbare perusal & investigation has submitted his inquiry report on dated 15-07-2023 with the recommendations that:

*"Both the clerks i.e Mr. Muhammad Ibrar Senior Clerk, SDEO (M) Charsadda & Mr. Abdur Rehman Junior Clerk, SDEO (F) Charsadda may be proceeded under the KP Govt: Servants (E&D Rules, 2011) & stringent action may be taken against Mr. Abdur Rehman because he is the main actor in this play & all the characters are*

*revolved around him in this fraudulent drama". (Copy of the inquiry report is Annex-C)*

- 4 That Para-4 is correct to the extent of serving a Show Cause Notice vide letter dated 27-09-2023 upon the appellant under the provision of Rule-7 of E&D Rules, 2011 regarding the allegation of processing a fake & bogus retirement on medical ground cases of the above said teachers in violation of the Rules & Policy in vogue.
- 5 That Para-5 is correct that a regular inquiry vide Notification bearing Endst No. 5579-82 dated 06-07-2023 has been conducted by the Respondent No, 2 through Mr. Liaqat Ali the then District Education Officer (M) Mohmand in terms of the fake & bogus letters No. 1278 & 1273 dated 05-05-2023 under the scanned & bogus signature of the AD (Estab/M) Local Directorate maneuvered by the appellant to the authority concerned on the mala fide.
- 6 That Para-6 is incorrect & mis leading in terms of the reply submitted by the Respondents in the above referred Paras as he has directly been involved in the alleged fake & bogus transaction.
- 7 That Para-7 is correct that a Departmental appeal against the Notification dated 08-11-2023 has been filed by the appellant which was seen & filed by the proper forum under the Rules.
- 8 That Para-8 is incorrect as the appellant is not an aggrieved person within the meaning of Section 4 of KP Service Tribunal Act 1974 read with Article, 212 of the constitutional of 1973, therefore, the appeal in hand is liable to the dismissed on the following ground inter alia: -

**ON GROUNDS.**

- A. **Incorrect & not admitted.** the appellant has been treated as per law vide Notification dated 08-11-2023, hence, not entitled for the relief he is seeking from this learned Tribunal in the tiled appeal.
- B. **Incorrect & not admitted.** The plea of the appellant is illegal & liable to be rejected as the Notification dated 08-11-2023 is the result of due process of law & Rules.
- C. **Incorrect & not admitted.** The act of the Department with regard to the Notification dated 08-11-2023 is legal & liable to be maintained.
- D. **Incorrect & not admitted.** The plea of the appellant is illegal & liable to be rejected as he has been treated vide the above said Notification under the Rules & Policy by the Department.

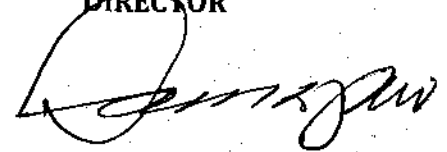
- E. Incorrect & not admitted, the stand of the appellant is illegal & liable to be rejected on the grounds that he is not entitled for the restoration against the senior clerk post in view of the fore made factual position of the titled appeal in hand.
- F. Incorrect & not admitted, the stand of the appellant is illegal & liable to be rejected in terms of the fore-made submission on the grounds that the Notification dated 08-11-2023 is in accordance with the provision of 4 & 25 of the constitution of 1973.
- G. Incorrect & not admitted, the stand of the appellant is illegal & liable to be rejected as he has been served with a show cause notice as referred above.
- H. Incorrect & not admitted, the stand of the appellant is illegal & liable to be rejected as he has been given fair chance of participation in the departmental proceedings against the appellant as evident from the cited inquiry report.
- I. Incorrect & not admitted, the stand of the appellant is illegal on the grounds that the Notification dated 08-11-2023 is the result of prescribed legal procedure in vogue.
- J. Incorrect & not admitted, the stand of the appellant is illegal as formal inquiry through DEO (M) Mohmand has been conducted by the Department who has proposed Departmental proceedings against the appellant under the Rules.
- K. Incorrect & not admitted, the stand of the appellant is illegal on the grounds that the Notification dated 08-11-2023 is the result of prescribed legal procedure in vogue.
- L. Legal. However, the Respondent also seek leave of this Honorable Bench to submit additional grounds record & case law at the time of arguments on the date fixed in the titled case.

PRAYER

In view of the above made submission it is requested that this Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department by maintaining the Notification dated 08-11-2023 in favor of the Respondent Department in the interest of justice please.

Dated \_\_\_/\_\_\_/2024.

SAMINA ALTAF  
DIRECTOR



AUTHORIZED OFFICER  
ABDUS SAMAD  
DEPUTY DIRECTOR  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 416/2024**

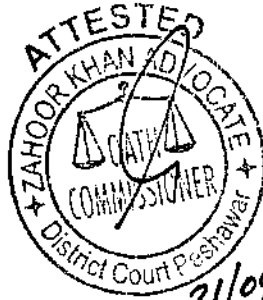
**Muhammad Ibrar, Senior Clerk (reverted to Junior Clerk Post) District  
Charsadda..... Appellant**

**VERSUS**

**District Education Officer (M) Charsadda & others..... Respondents**

**AFFIDAVIT**

**I, Samina Altaf Director E&SE Khyber Pakhtunkhwa**, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.



**SAMINA ALTAF  
DIRECTOR**

**AUTHORIZED OFFICER  
ABDUS SAMAD  
DEPUTY DIRECTOR  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.**



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) E&SE CHARSADDA



001-9220-101-82 unischarsadda@yahoo.com facebook.com/Deomcharsadda

No. 10387-94 Dated: 27/9/2023

To,

1. The DEO (Female) Charsadda.
2. The SDEO (Male) Charsadda.
3. The SDEO (Male) Tangi.

SUBJECT:- SHOW CAUSE NOTICES.

Memo.

I am to refer to the subject cited above and to enclose herewith Show cause notices in original received from worthy Director (E&SE) Khyber Pakhtunkhwa in respect of the following officials with the direction to issue the said notices to the officials concerned.

1. Mr. Noor Ullah Jan PS/IT BPS-15 GPS Mian Sahib Gul Qilla Tangi Charsadda.
2. Muhammad Tayyub PS/IT BPS-15 GPS Gul Khitab Koroona Charsadda.
3. Abdur Rahman Junior Clerk BPS-11 SDEO (Female) Charsadda.
4. Muhammad Ibrar Senior Clerk BPS-14 SDEO (Male) office Charsadda.

Therefore, you are informed to hand over the original Show cause notices of your respective officials properly under intimation to this office.

DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Assistant Director (Litigation)  
E&SE Department  
Khyber Pakhtunkhwa

No. \_\_\_\_\_ / dated Charsadda the \_\_\_\_\_ / 2023

Copy for information to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar w/r to his good office letter No. 5028/F.No C-333/Establishment (M-1) dated 13.09.2023
2. Officials Concerned.
3. Master File.

DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA



-6/A-



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

**SHOW CAUSE NOTICE**

I, Dr. Iqbal Khan, Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules (7), 2011, do hereby serve upon you, Muhammad Ibrar Senior Clerk at SDEO (M) Charsadda as follow:

1. As per report of inquiry report bearing No. 8624 dated 15-07-2023 submitted by District Education Officer (Male) Mohmand in the light of this office Notification bearing No.5579-83 dated 06-07-2023; you, in utter violation of the procedure directed by the Govt. of Khyber Pakhtunkhwa Establishment Department vide letter No. SO(Policy) E&AD/1-3/2012/APT Rules dated 07-06-2023 and close collusion with Mr. Abdur Rehman J/Clerk (BPS-11) SDEO (F) Charsadda have been found involved in issuance of fake letters bearing No.1278 dated 05-05-2023 and 1271 dated 05-05-2023 under the signatures of Assistant Director (Etab-I) Local Directorate, in connection with the retirement cases on medical ground basis of the following teachers.

- Mr. Noor Ullah Jan PSHT(BPS-15) GPS Mian Sahib Gul Qilla Tangi District Charsadda.
- Muhammad Tayyub PSHT(HPS-15) GPS Gul Khitab Koorona District Charsadda.

Your conduct is prejudicial to service discipline, contrary to the Khyber Pakhtunkhwa Province Government Servants (Conduct) Rules, 1987 and conduct unbecoming of a Civil Servant.

I am satisfied that you are guilty of misconduct and involved in illegal practice of corruption as specified in Rule 3(c) and 3(d) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

2. As a result thereof, I, Dr. Iqbal Khan Director, Elementary & Secondary Education Khyber Pakhtunkhwa, as competent authority, have tentatively decided to impose upon you the major penalty of "Reduction to Lower Post" under rule 4(b)(i) of the Ibid rules.


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

4. If no reply to this notice is received within fifteen days of its issuance, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

  
(Dr. Iqbal Khan)  
Director

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

Muhammad Ibrar Senior Clerk at SDEO (M) Charsadda

*Attester*  
  
Assistant Director (Litigation)  
E&SE Department  
Khyber Pakhtunkhwa Peshawar

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INQUIRY REPORT

**INTRODUCTION:**

The Director Elementary & Secondary Education Khyber Pakhtunkhwa was pleased to nominate the w/signed as inquiry officer to conduct inquiry against the following teachers being involved in provision of fake letter of the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for retirement on Standing Medical Board vide his office Notification No 5579-82 dated 6/7/2023.

S.No.	Name of Teacher & Designation	School	Fake letter No & Date
1	Noor Ullah Jan PSHT	GPS Mian Sahib Gul Qilla Tangi	No. 1278 dated 5/5/2023
2	Muhammad Tayyeb PSHT	GPS Gul Khilab Koroonah Charsadda	No. 1271 dated 5/5/2023

(Annexure-1 & 2 & 3)

**PROCEEDINGS:**

1. Soon after the receipt of notification regarding inquiry, the w/signed adopted his own modus operandi i.e. a letter was written to District Education Officer (Male) Charsadda vide DEO (M) Mohmand No 8544 dated 8/7/2023 which was shared on the personal WhatsApp No of the DEO (M) Charsadda No.0331-9512981 with the request to direct all the concerned stake holders through a proper letter to appear for the instant inquiry at his office on 11/7/2023 before the inquiry officer and make ready all the relevant record in proper order. (Annexure-4). The DEO (M) Charsadda shared a letter in response to the said letter addressed to the SDEOs (M) Tangi & Charsadda vide his office No 6732 dated 8/7/2023 in which he directed them to attend the instant inquiry on 11/7/2023 at 10 am. (Annexure-5) The w/signed visited the said office on the scheduled date and time in order to follow the principle of Audi alteram partem and also to observe the soul of Article 10A of the Constitution of Pakistan which related to the right of a person of fair trial & gathered the following statements and record.

2. Mr. Noor Ullah Jan PSHT GPS Mian Gul Sahib Gul Qilla Tangi stated that he has been working since 1987 and promoted to PSHT. He stated that he is suffering from different diseases and he applied for pension on Medical Board. He said that he handed over this task to his nephew, Mr. Muhammad Ibrar s/clerk at SDEO (M) Charsadda who has assigned this task to his friend Abdul Rehman J/C at SDEO (F) Charsadda in his presence. He further stated that Muhammad Ibrar shared the letter in question (Fake letter as mentioned above against his name as Annexure-2) & the same letter was handed over to SDEO (M) Tangi. The statement was recorded in presence of the SDEO (M) Tangi & he attested. (Annexure-6)

3. Mr. Muhammad Tayyeb PSHT GPS Gul Khilab Koroonah Charsadda recorded his statement and he said that he is working as PST since 28/9/1987 and promoted to PSHT and he also said that he has been suffering from various diseases. He also wanted to take pension on Medical Board and he assigned this task to his relative Mr. Abdul Lateef who was a clerk in DEO (F) Charsadda now retired and he further assigned this task to Abdul Rehman J/C SDEO (F) Charsadda. He said that he did not have any knowledge about the fake letter as mentioned above against his name as Annexure 3 and information may be asked about this fake letter from Abdul Lateef and Abdul Rehman. The statement was recorded in presence of the SDEO (M) Charsadda & he attested. (Annexure-7)

Attested  
of  
Assistant Director (Litigation)  
E&SE Department  
Peshawar  
Khyber Pakhtunkhwa

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4. Mr Muhammad Ibrar S/Clerk SDEO (M) Charsadda recorded his statement in the presence of the SDEO (M) Charsadda. He said that he received letter No 1278 dated 5/5/2023 (fake letter of the Directorate) from Abdur Rehman J/C SDEO (F) Charsadda and shared with Mr Noorullah Jan PSHT at his whatsapp No on 5/6/2023 at 6:13 pm. (Annexure-8) He attached the screen shot of the whatsapp with his statement. (Annexure-9)
  5. Mr, Abdur Rehman J/Clerk SDEO (F) Charsadda recorded his statement in which he said that he has not shared the fake letter in question with any one. He said that it is a scanned copy and anyone can scanned easily in order to malign his name. He blamed Mr. Fakhre Alam s/clerk DEO (M) Charsadda who is working at ADEO (Pry) Charsadda had a money deal with him that he would do the retirement cases in hand. He said that he gave him the money for the said task. He further stated that Fakhre Alam shared the fake letter with Mr. Anwer Ali Shah AD Establishment in the Directorate through his Class IV to malign his name through these fake letters. He said that he can present a witness regarding the said deal/bribe. (Annexure-10).
  6. Mr. Sheraz ADEO (Pry) Establishment and Fakhre Alam dealing clerk jointly recorded their statement. The gist of their statement is that the p/o the DEO (M) Charsadda received the fake letters in question from the concerned SDEOs i.e. SDEO (M) Tangi letter No 2570 dated 12/6/2023 & SDEO (M) Charsadda No 1678 dated 20/6/2023. (Annexure-11 & 12 & 13)
  7. Mr. Shams ul Islam SDEO (M) Charsadda & Mr. Muhammad Ibrar s/clerk jointly stated that the photo copies fake letter No 1271 dated 5/5/2023 & other relevant documents were received from Muhammad Tayyeb PSHT and sent to DEO (M) Charsadda vide his office No 1678 dated 20/6/2023. (Annexure-14)
  8. In order to verify the Standing Medical Board letters, the u/signed visited the Medical Superintendent Services Hospital Peshawar on 13/7/2023 and met with the concerned Medical Superintendent Mr. Dr. Niaz Muhammad (MS & Chairman SMB) and wrote a letter with the request for verification of SMB in r/o Mr. Noor Ullah Jan PSHT vide his office No 6645-46 dated 13/7/2023 and SMB in r/o Mr Muhammad Tayyeb PSHT vide his office No 8750-51 dated 13/7/2023 and the same were verified vide his office No 2614 dated 13/7/2023. (Annexure-15 & 16). The Medical Superintendent narrated the story of fake & fabricated SMBs retirement in the DEO (F) Charsadda & also handed-over copies of two letters i.e. one letter the MS wrote to the Secretary Govt of Khyber Pakhtunkhwa Health Department vide his office No 564-69 dated 18/8/2022 in which he stated that most of the SMBs cases of DEO (F) Charsadda were fabricated and bogus. (Annexure-17) while another letter enclosing the said letter of the MS & Chairman of SMB Services hospital Peshawar addressed to the Secretary to Govt of Khyber Pakhtunkhwa E&SED, Peshawar vide Govt of Khyber Pakhtunkhwa Health Department No SOG/HD/1-49/M.A.R/2022 dated 29/9/2022 with the request for inquiry. (Annexure-18)
  9. In order to verify the Directorate letters No 1278 dated 5/5/2023 & 1271 dated 5/5/2023, the u/signed visited the Establishment Section of the Directorate of E&SE KP Peshawar on 13/7/2023 and obtained the statement of concerned Assistant Directors. They jointly stated that the letters in question are fake & fabricated and the Despatched Nos recorded on the letters are also fake. In fact as per Directorate of E&SE KP Peshawar Despatched Register No 1278 dated 5/5/2023 was addressed to the Section Officer for retirement Grant & No 1271 dated 5/5/2023 is not existed but No 1270-76 dated 28/4/2023 existed which was issued in r/o Rizwan ullah J/C (Annexure-19 & 20 & 21)

Assistant Director  
E&SE Department  
Khyber Pakhtunkhwa

1577/2023



RECORD/DOCUMENTS RECEIVED FROM THE O/O THE DEO (M) CHARSAJDA

- ❖ SMB letters of Chairman SMB MS Police Service Hospital Peshawar to the Assistant Director Directorate of E&SE KP Peshawar vide his office No 6645-46 dated 3/4/2023 in r/o Mr Noor Ullah Jan PSHT & SMB No 8750-51 dated 14/4/2023 in r/o Mr. Muhammad Tayyeb PSHT. (Annexure-22 & 23)
- ❖ A letter of DEO (M) Charsadda to the Directorate for verification of SMB & fake letter in question in r/o Muhammad Tayyeb PSHT GPS Gul Khitab Korona Charsadda vide his office No 6515 dated 27/6/2023. (Annexure-24)
- ❖ Note sheet copy regarding retirement case of Mr. Muhammad Tayyeb PSHT is attached as Annexure-25.

11. FINDINGS: The prima facie evidences & statements prout patet per recordum unveil the following facts and findings.

- i. That the Directorate of E&SE KP Peshawar letters No 1278 dated 5/5/2023 & 1271 dated 5/5/2023 were fabricated, scanned & bogus and the two clerks i.e. Mr Muhammad Ibrar S/clerk SDEO (M) Charsadda and Abdur Rehman J/Clerk SDEO (F) Charsadda were involved in this bargain and scanned letters as both of them deal with the concerned teachers for money especially Mr. Abdur Rehman is the main character of this whole drama and the hub of these fake & fabricated letters. The past track record of Abdur Rehman J/clerk is also tainted as he was transferred on administrative ground from SDEO (M) Charsadda to GHS Shabqadar by the then DEO (M) Charsadda vide DEO (M) Charsadda No 13232-37 dated 24/9/2021 upon the recommendation of the inquiry report. (Annexure-26)
- ii. That there was contradiction in the verbal statement and written statement of Mr. Abdur Rehman J/C as verbally he admitted that he handed over the fake and scanned fabricated letter to Mr. Muhammad Ibrar but subsequently he denied the same in his written statement which indicates his dual nature and deceitful personality. He tried to hide facts from the inquiry officer.

- iii. That Mr. Abdul Malik (DEO (M) Charsadda) issued the Retirement Notification in respect of Mr. Noor Ullah Jan PSHT GPS Mian Sahib Gul Qila Tangi in haste astonishingly in spite of the fact that ADEO (Establishment) clearly wrote in the note sheet that the letter needs to be verified from the Directorate. However, there is also doubt about one line of the note sheet & it may be written afterwards by the concerned ADEO as the font size is slightly smaller than the whole Para and also two ideas were put up to the DEO concerned in the same Para i.e. the other is retirement notification. However, it is also worth mentioning that dealing Assistant put up the case on 14/6/2023 and ADEO Establishment also wrote his Para on 14/6/2023 and DEO (M) Charsadda approved the Para of the ADEO concerned on 14/6/2023 while DDEO concerned was bypassed in the said case. The DEO (M) Charsadda signed and issued the Retirement Sanction on medical ground on 15/6/2023 in r/o Mr. Noor Ullah Jan PSHT vide his office No 6158-59 dated 15/6/2023 without bothering to verify the scanned copy received from the SDEO (M) Tangi. (Retirement Notification on SMB in r/o Mr. Noor Ullah Jan PSHT is attached as Annexure-27 & Note sheet copy is attached as Annexure-28)



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- 18
- iv. That the DEO (M) Charsadda withdrew the retirement order issued vide his office No 6155-59 dated 15/6/2023 in r/o Mr. Noor ullah Jan PSHT vide his office No 6191-95 dated 15/6/2023 (Annexure-29) but astonishingly no action was initiated against wrong doers. However, at last the fake & fabricated scanned letter No 1278 dated 5/5/2023 was sent to the Directorate for verification vide his office No 6305 dated 21/6/2023 (Annexure-30).
- v. Both Mr. Shanis ul Islam (SDEO (M) Charsadda) & Mr. Wisal (SDEO (M) Tangi) committed blunders for forwarding the cases for retirement on medical ground on the basis of a fake scanned copy of the Directorate letter and not verifying the letter from the DEO (M) Charsadda as the letters were addressed to DEO (M) Charsadda.

RECOMMENDATIONS: In view of the above, it is recommended:

- 1) That both the clerks i.e. Mr. Muhammad Ibrar S/clerk SDEO (M) Charsadda & Mr. Abdur Rehman J/clerk SDEO (F) Charsadda may be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 & stringent action may be taken against Mr. Abdur Rehman because he is the main actor in this play and all the characters are revolved around him in this fraudulent drama.
- 2) That Mr. Abdur Rehman J/clerk may also be transferred immediately from the SDEO (F) Charsadda and may be posted in a male school and his transfer to offices may be banned forever.
- 3) The reports of Standing Medical Board in r/o of both the teachers may be sent to the SMB for review as both the teachers look healthy and also they used money for the said purpose.
- 4) That both the teachers may also be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the said action in the play.
- 5) The Mr. Abdul Malik DEO (M) Charsadda, Mr. Wisal SDEO (M) Tangi & Mr. Sham ul Islam SDEO (M) Charsadda may be warned not to repeat such mistake in future.
- 6) A full-fledged inquiry may be conducted to probe all the cases of SMB in the DEO (F) Charsadda or a soft request may be sent to the Secretariat of E&SED KP Peshawar by enclosing the said letters of the Medical Superintendent Services Hospital, Peshawar as annexed 17 & 18 above.

The report is submitted for further necessary action please.

Affected

Assistant Director (Litig.  
E&SE Department  
Khyber Pakhtunkhwa Pesna.

(LIQAT ALI)  
District Education Officer  
(Male) Mollund

15/7/2023







**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.**

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**AUTHORITY LETTER**

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Muhammad Rizwan, Assistant Director (Litigation-II) of this Directorate for submission of Joint Parawise Comments in Service Appeal No. 416/2024 case titled Muhammad Ibrar, Senior Clerk (reverted to Junior Clerk Post) District Charsadda Vs Government of Khyber Pakhtunkhwa & others, hence, an authority letter is hereby issued in favor of the above-named officer.

**(SAMINA ALTAF)  
DIRECTOR**

**AUTHORIZED OFFICER  
(ABDUS SAMAD)  
DEPUTY DIRECTOR  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.**



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

**NOTIFICATION**

I, Samina Altaf, Director Elementary & Secondary Education Department Khyber Peshawar do hereby authorize, Mr. Abdus Sammad, Deputy Director (Legal) Directorate of Elementary & Secondary Education to sign parawise comments, replies, implementation report, objection petitions, civil miscellaneous application etc on my behalf for onward submission before the courts of law/tribunals as the case may be, with immediate effect in the interest of public service.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

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Dated Peshawar the 26/07/2024.

Copy of the above is forwarded for information & n/action to the:

1. Chief Secretary Khyber Pakhtunkhwa.
2. Advocate General Khyber Pakhtunkhwa.
3. Secretary Law Department Khyber Pakhtunkhwa.
4. Learned Registrar High Court Peshawar (with one each spare copy for the Honorable Judges).
5. Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar (with one each spare copy for the Honorable Chairman/Members).
6. All Section Officers E&SE Department Khyber Pakhtunkhwa, Peshawar.
7. All District Education Officer (Male/Female) Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department Khyber Pakhtunkhwa, Peshawar.
9. PA to Additional Secretary (General) E&SE Khyber Pakhtunkhwa, Peshawar.
10. PA to Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
11. Master File.

**(SAMINA ALTAF)**  
**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.