

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal # 2209/2023

Muhammad Adnan.....Appellant.

VERSUS

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

Service App INDEX 2023

S#	Description of Documents	Annex	Pages
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Deponent

*Received on verbal directions
of registrars*

Registered



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

Dated Peshawar the November 8th, 2023

NOTIFICATION

No. SO(Inq)E&SED/1-17/2023/Mr. Sami Ullah & Mr. Mati Ullah/SS/Kohat: The Competent Authority/ Chief Secretary Khyber Pakhtunkhwa is pleased to constitute Inquiry Committee comprising of Muhammad Khalid Zaman (PMS BS-19), Project Director, Computerization of Land Record, Phase-I, Board of Revenue Department and Muhammad Shiraz, District Education Officer (MC BS-19), awaiting posting to conduct formal inquiry against the following Subject Specialists for the charges mentioned in the Charge Sheet and Statement of Allegations:

S#	Name & Designation of Accused
1	Mr. Sami Ullah, Subject Specialist (Chemistry), BS-17, GHSS Nandraka, Kohat
2	Mr. Mati Ullah, Subject Specialist (Physics), BS-17, GHSS Nandraka, Kohat

2. The inquiry committee shall submit report to the Competent Authority within (60) days positively (Copies of Charge Sheets & Statements of Allegations are enclosed for all concerned).

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date:

Copy forwarded to the:

1. Muhammad Khalid Zaman (PMS BS-19), Project Director, Computerization of Land Record, Phase-I, Board of Revenue Department (**Copy of Charge Sheet & Statement of allegations enclosed**).
2. Muhammad Shiraz, District Education Officer (MC BS-19), awaiting posting (**Copy of Charge Sheet & Statement of allegations enclosed**).
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Male), Kohat.
5. Mr. Sami Ullah, Subject Specialist (Chemistry), BS-17, GHSS Nandraka, Kohat (**Copy of Charge Sheet & Statement of allegations enclosed**).
6. Mr. Mati Ullah, Subject Specialist (Physics), BS-17, GHSS Nandraka, Kohat (**Copy of Charge Sheet & Statement of allegations enclosed**).
7. Section Officer (Schools/ Male) E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. Office order file.

Assisted
3/11/23
Section Officer (Inquiries)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa

3/11/23
(Bilal Khan)
Section Officer (Inquiries)



(12)
GOVERNMENT OF KHYBER PAKHTUNKHWA
COMPUTERIZATION OF LAND RECORDS (PMU)
BOARD OF REVENUE
Revenue Academy Hayat Abad
Office: 9219242, 9219243
Email: computerization.phase2@gmail.com

(60)

PD/PMU/CLR/: 34199

Dated: 25-01-2024.

To.

The Secretary
Elementary & Secondary Education,
Khyber Pakhtunkhwa.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 16364

Dated 07-10-24

Subject: SUBMISSION OF INQUIRY REPORT.

Reference to the E&SED notification no. So(inq) E&SED /1-17/2023/Mr. Sami Ullah & Mati Ullah/SS/ Kohat dated on 8 November 2023 wherein the inquiry committee comprising of Muhammad Khalid Zaman (Project Director) & Muhammad Sheraz (DEO) has been constituted.

In this regard, the same inquiry has been completed and the report is submitted for further necessary action please.

Attended

S. J. 13

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

M. J. 2
Project Director

Computerization of Land Records
Board of Revenue.

(13)

(61)

1. Introduction:

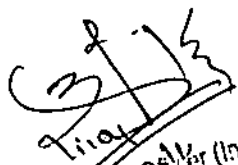
The Chief Secretary Khyber Pakhtunkhwa had appointed the following inquiry committee comprising of Mr. Muhammad Khalid Zaman (PD Computerization of Land Records) and Mr. Muhammad Sheraz (DEO awaiting posting) (ANNEX: A) Vide Elementary and Secondary Education Department Khyber Pakhtunkhwa Notification No. SO(Inq) E&SED/1-17/2023/Mr. Sami Ullah & Mr. Mati Ullah/SS/Kohat Dated the November 8TH 2023.

2. The charge sheet and statement of allegations against the accused officers state that:

1. The accused officer Mr. Sami Ullah SS Chemistry GHSS Nandraka Kohat has paid Rs: 60000/ as bribe to Mr. Muhammad Adnan Senior Scale Stenographer (BPS-16) E&SED for issuance of posting/transfer order despite ban on all kinds of posting/transfers.
2. The accused officer Mr. Mati Ullah SS Physics GHSS Nandraka Kohat has paid Rs: 60000/ as bribe to Mr. Muhammad Adnan Senior Scale Stenographer (BPS-16) E&SED for issuance of posting/transfer order despite ban on all kinds of posting/transfers.
3. By the reason of the above, both officers have appeared to be guilty of inefficiency misconduct and misuse of authority under Rule-3 of the Khyber Pakhtunkhwa government servants (Efficiency and Discipline) Rules 2011 and have rendered themselves liable to all or any of the penalties specified in Rule-3 of the Rule ibid.

3. Inquiry Proceedings:

1. The Inquiry Committee proceeded with the inquiry vide letter No. PMU/CLR/PD Phase-1: 34006 Dated 23/11/2023 (ANNEX: F) requesting the Secretary E&SED, Khyber Pakhtunkhwa, to depute his representative well versed with the case and directed to appear before the inquiry committee on Friday, 24th November 2023 at 11:00AM in the office of Project Director Phase-1, CLR, PMU.
2. All the stake holders attended the inquiry proceedings on 24/11/2023 on the given venue and time.
3. Mr. Sami Ullah SS Chemistry GHSS Nandraka Kohat, Mr. Mati Ullah SS Physics GHSS Nandraka Kohat appeared before the inquiry committee on 23/11/2023(ANNEX: G) and submitted their written statements. (ANNEX: G&H)
4. Mr. Farid Ullah Shah Principal GHSS Jandrai Karak, Mr. Akhtar Mehmood Principal GHSS Nandraka Kohat and Mr. Muhammad Adnan Senior Scale Stenographer E&SED also appeared before the inquiry committee and submitted their written statements (ANNEX: I).
5. Mr. Bilal Khan Section Officer Inquiry also provided a copy of the inquiry report conducted by Mr. Abdul Haq Section Officer E-III against Mr. Muhammad Adnan senior scale stenographer.


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

4. Findings.

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1. Fake transfer Notification NO.SO(SM) E&SED/5-17/2022/PT/SS Dated the August 31, 2022, was issued in respect of Mr. Sami Ullah SS Chemistry GHSS Nandraka Kohat. (ANNEX:M).
2. Fake transfer Notification NO.SO(SM) E&SED/5-17/2022/PT/SS Dated the August 31, 2022, was issued in respect of Mr. Mati Ullah SS Physics GHSS Nandraka Kohat. (ANNEX: N).
3. Both the transfer Notifications were issued with the same No.SO (SM) E&SED/5-17/2022/PT/SS dated 31 August 2022.
4. It may be added that another inquiry in the subject case has already been completed wherein the senior scale stenographer Mr. Muhammad Adnan has been proven guilty and the correspondence between the two accused subject specialists and Mr. Adnan has been established resulting in issuing of the above-mentioned fake transfer orders.
5. Another person involved in issuing these fake transfer orders is Mehboob Ur-Rehman. As per the inquiry report of Mr. Abdul Haq Mr. Mehboob Ur-Rehman is a private person/party worker associated with the Ex Minister of education Mr. Shahram Tarakai. As per the statement of Mr. Adnan, as reported by inquiry officer Mr. Abdul Haq in his inquiry report, the amount received by Mr. Muhammad Adnan from the two accused subject specialist had been handed over to Mr. Mehboob Ur- Rehman. Mr. Abdul Haq in his inquiry report has recommended FIR under section 162/417/419 of the Pakistan Penal Code.
6. Transaction history of the alleged amount made by two subject specialists to Mr. Muhammad Adnan senior scale stenographer through Easy Paisa Account is not available on the record.

5. Conclusion:

From the perusal of the produced record and statements of the concerned officials it has been established that the subject transfer orders were fake. And Mr. Adnan has already been punished in the subject case. The two subject specialists also have established correspondence with Mr. Muhammad Adnan which negate their innocence. The third person involved in this case is Mr. Mehboob Ur-Rehman, who by virtue of his political clout had been able to extract bribe from departmental official Mr. Muhammad Adnan.

6. Recommendations:

1. It is recommended that the department proceed to initiate proceedings under the relevant section of laws against Mr. Mehboob Ur- Rehman so as to discourage such touts.
2. It is also recommended that the department of E&SED should issue a notification barring all irrelevant person's entry and discussing official matters with the officials of the department.

(39/13)
Tiaat
Inspection Officer (Inquiries)
Elementary & Secondary Edu Deptt:
Faisalabad, Punjab, Pakistan

- (8)
3. The departmental officials must be directed in unequivocal terms not to engage/share official information with any political person/tout, until he or she has been officially notified?
 4. The department of E&SED needs to frame the clear-cut transfer/posting policy to avoid such like cases in future.
 5. Penalty of Stoppage of two annual increment for a period of two years be imposed on Mr. Sami Ullah SS Chemistry GHSS Nandraka Kohat and Mr. Mati Ullah SS Physics GHSS Nandraka Kohat.

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~~11/11/24~~

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

~~MKZ~~

Muhammad Khalid Zaman (PMS-19)
Project Director Computerization of Land Records.
Mohamend.
Chairman of inquiry committee.

~~Sheraz Ahmad~~
22/11/24

Mr. Sheraz Ahmad (BPS-19) Member
District Education Officer (M)



(6)

Computerization of Land Records Project
Project Management Unit
Revenue & Estate Department, KP
Office: 9219242, 9219243

PMU/CLR/PD Phase-I: 34006

Dated: 23/11/2023

To

The secretary
Elementary & Secondary Education
Khyber Pakhtunkhwa.

Subject: INQUIRY

Reference to the E&SE notification no. So(inq) E& SED /1-17/2023/ Mr. Sami Ullah & Mati Ullah/SS/ Kohat dated on 8 November 2023 wherein the undersigned has been nominated as inquiry officer.

In this regard it is requested that a departmental representative (well versed with the case) may please be nominated & directed to appear before the inquiry officer on Friday, 24th November 2023 at 11:00 PM in the office of the Project Director Phase-I, CLR, PMU.

(3) 1/11/23
Section Officer (Inquiries)
Elementary & Secondary Edu. Deptt
Govt. of Khyber Pakhtunkhwa

Project Director
Computerization of Land Records

Endst: of even No. & Date: 34006(1-6)

1. Muhammad Shiraz (DEO) Elementary & Secondary Education, Kp
2. Ex Deputy Secretary (Rehmat Ali) Elementary & Secondary Education, Kp.
3. EX Section Officer (M) Elementary & Secondary Education, Kp.
4. Senior Steno Grapher (Adan) Establishment, Kp
5. Principal Fareed Ullah Shah GHSS (Jandrai) district Karak, Kp.
6. Principal GHSS Akhtar Mehmood (Nandraka). district Kohat, Kp.

To appear before
the inquiry office on
Friday, 24th Nov
2023 in the office of
the Project Director
Phase-I CLR, PMU

Project Director
Computerization of Land Records

(17)

(65)

BEFORE THE WORHTY INQUIRY COMMITTEE .

Ref: No Notification No. SO (Ing) E&SED/1-17/2023 DATED 08/11/2023.

subject:- Written Reply to the charge on behalf of Mati Ullah Subject Specialist (Physics) , BPS-17, GHSS Nandraka, Kohat presently Subject Specialist GHSS Kando Khel Tehsil & District, Karak.

Respected Sir,

Written reply is submitted on behalf of the above said Mati Ullah.

1. That the allegations leveled against the undersigned is illegal, against law and baseless.
2. That the undersigned has not paid a single penny to the so called Muhammad Adnan Senior Scale Stenographer (BPS-16).
3. That payment of Rs. 60,000/- as bribe is mere and mere allegations leveled against the undersigned.
4. That before the constitution of inquiry committee the undersigned was forced and blacked mailed by the some maneuvering persons and pressurized to give statement before Deputy Secretary Education (Establishment) and Section Officer (Male) Schools. The undersigned was pressurized that if you are not ready to give such like statement then you will be dismissed from service and you will be sent to jail. So I the undersigned have given a statement as they wished.
5. That the undersigned has blatantly denied the allegations of payment of bribe given to Mr. Adnan.
6. That the transfer order of the undersigned was not issued during ban period but it was issued before imposing of ban on transfer & posting on 31/08/2022 and the ban was imposed on 01/09/2022.
7. That with permission of the inquiry committee any other ground for defense will be taken during personal hearing.

It is, therefore, most humbly and respectfully prayed that undersigned is not guilty of inefficiency and committed no mis-conduct, may be honourably exonerated

Dated:- 20/11/2023

Mati Ullah Subject Specialist
(Physics) BPS-17 GHSS
Kando Khel , Karak.
Cell No. 0334-9006475

Section Officer (Inquiries)
Secretary & Secy. Edu. Deptt.
Govt. of Khyber Pakhtunkhwa

(8)

(66)

BEFORE THE WORTHY INQUIRY COMM

Ref: No Notification No. SO (Ing) E&SED/1-17/2023 DATED 08/11/2023.

subject:- Written Reply to the charge on behalf of Sami Ullah Subject Specialist (Chemistry) , BPS-17, GHSS Nandraka, Kohat presently Subject Specialist GHSS Dabli Lawaghar Tehsil & District, Karak.

Respected Sir,

Written reply is submitted on behalf of the above said Sami Ullah.


1. That the allegations leveled against the undersigned is illegal, against law and baseless.
2. That the undersigned has not paid a single penny to the so called Muhammad Adnan Senior Scale Stenographer (BPS-16).
3. That payment of Rs. 60,000/- as bribe is mere and mere allegations leveled against the undersigned.
4. That before the constitution of inquiry committee the undersigned was forced and blacked mailed by the some maneuvering persons and pressurized to give statement before Deputy Secretary Education (Establishment) and Section Officer (Male) Schools. The undersigned was pressurized that if you are not ready to give such like statement then you will be dismissed from service and you will be sent to jail. So I the undersigned have given a statement as they wished.


That the undersigned has blatantly denied the allegations of payment of bribe given to Mr. Adnan.

6. That the transfer order of the undersigned was not issued during ban period but it was issued before imposing of ban on transfer & posting on 31/08/2022 and the ban was imposed on 01/09/2022.
7. That with permission of the inquiry committee any other ground for defense will be taken during personal hearing.

It is, therefore, most humbly and respectfully prayed that undersigned is not guilty of inefficiency and committed no mis-conduct, may be honourably exonerated

Dated:- 20/11/2023


Sami Ullah Subject Specialist
(Chemistry) BPS-17 GHSS
Dabli Lawaghar, Karak.
Cell No. 0333-9713635


Section Officer (Inquiries)
Elementary & Middle Schools
Govt. of Khyber Pakhtunkhwa
Edu. Deptt
Shawa

(9)

CHARGE SHEET

1. Mr. Nadeem Aslam Chaudhary, Chief Secretary Khyber Pakhtunkhwa as Competent Authority, hereby charge you Mr. Samiullah, Subject Chemistry (BS-17), GHSS Nandraka, Kohat as follows:

2. That, you while posted as Subject Specialist Chemistry, GHSS Nandraka, Kohat committed the following irregularities:

i. As per your statement, you have paid Rs.60,000/- as bribe to Muhammad Adnan, Senior Scale Stenographer (BPS-16), E&SE for issuance of posting / transfer order despite ban on all kinds of posting / transfers.

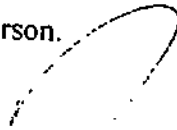
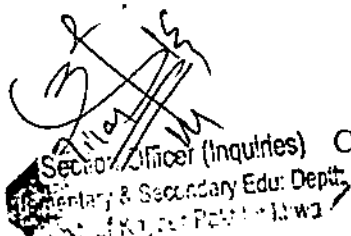
3. By reasons of the above, you appear to be guilty of inefficiency, misconduct and misuse of authority under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-3 of the Rules ibid.

4. You are, therefore, required to submit your written defense within ten days of the receipt of this Charge Sheet to the Inquiry Officer / inquiry committee, as the case may be.

5. Your written defense, if any, should reach the inquiry officer / inquiry committee within specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

6. Intimate whether you desire to be heard in person.

7. Statement of Allegations is enclosed.



Secretary (Inquiries)
Primary & Secondary Edu. Deptt.
Khyber Pakhtunkhwa

(NADEEM ASLAM CHAUDHARY)
CHIEF SECRETARY KHYBER PAKHTUNKHWA

Mr. Samiullah,
Subject Specialist Chemistry (BS-17),
GHSS Nandraka, Kohat

(40)

10/1/11

DISCIPLINARY ACTION

I, Mr. Nadeem Aslam Chaudhary, Chief Secretary Khyber Pakhtunkhwa as Competent Authority, am of the opinion that Mr. Samiullah, Subject Specialist Chemistry (BS-17), GHSS Nandraka, Kohat has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011.

STATEMENT OF ALLEGATIONS

That Mr. Samiullah, while posted as Subject Specialist Chemistry, GHSS Nandraka, Kohat, committed the following irregularities:


i. As per his statement, he has paid Rs.60,000/- as bribe to Muhammad Adnan, Senior Scale Stenographer (BPS-16), E&SE for issuance of posting / transfer order despite ban on all kinds of posting / transfers.

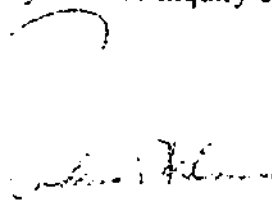
2. For the purpose of inquiry against the said accused with reference to the above mentioned allegations, an inquiry officer / inquiry committee, consisting of the following, is constituted under Rule 10(1)(a) of the ibid Rules:

- i. Muhammad Khalid Zaman. PD Level Record.
- ii. Muhammad Shaiq (DEO) District Peshawar

3. The inquiry officer / inquiry committee shall, in accordance with the provisions of ibid Rules, provide reasonable opportunity of hearing to the accused, record its findings and make within sixty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer / inquiry committee.


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


(NADEEM ASLAM CHAUDHARY)
CHIEF SECRETARY KHYBER PAKHTUNKHWA

Mr. Samiullah, Subject Specialist Chemistry
(BS-17), GHSS Nandraka, Kohat


(U)

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CHARGE SHEET

I, Mr. Nadeem Aslam Chaudhary, Chief Secretary Khyber Pakhtunkhwa as Competent Authority, hereby charge you Mr. Matiullah, Subject Specialist Physics (BS-17), GHSS Nandraka, Kohat as follows:

2. That, you while posted as Subject Specialist Physics, GHSS Nandraka, Kohat committed the following irregularities:
 - i. As per written statement, you have offered Rs.60,000/- as bribe to Muhammad Adnan, Senior Scale Stenographer (BPS-16), E&SED through Mr. Samiullah, SS Chemistry, for issuance of posting / transfer order despite ban on all kinds of posting / transfers.
3. By reasons of the above, you appear to be guilty of inefficiency, misconduct and misuse of authority under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-3 of the Rules ibid.
4. You are, therefore, required to submit your written defense within ten days of the receipt of this Charge Sheet to the Inquiry Officer / inquiry committee, as the case may be.
5. Your written defense, if any, should reach the inquiry officer / inquiry committee within specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
6. Intimate whether you desire to be heard in person.
7. Statement of Allegations is enclosed.


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

Mr. Matiullah,
Subject Specialist Physics (BS-17),
GHSS Nandraka, Kohat

(NADEEM ASLAM CHAUDHARY)
CHIEF SECRETARY KHYBER PAKHTUNKHWA

(12)

DISCIPLINARY ACTION

I, Mr. Nadeem Aslam Chaudhary, Chief Secretary Khyber Pakhtunkhwa as Competent Authority, am of the opinion that Mr. Matiullah, Subject Specialist Physics (BS-17), GHSS Nandraka, Kohat has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011.

STATEMENT OF ALLEGATIONS

That Mr. Matiullah, while posted as Subject Specialist Physics, GHSS Nandraka, Kohat, committed the following irregularities:

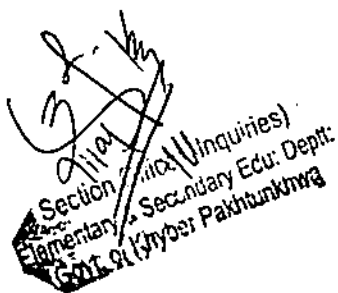
i. As per written statement, he has offered Rs.60,000/- as bribe to Muhammad Adnan, Senior Scale Stenographer (BPS-16), E&SE through Mr. Samiullah, SS Chemistry, for issuance of posting / transfer order despite ban on all kinds of posting / transfers.

2. For the purpose of inquiry against the said accused with reference to the above mentioned allegations, an inquiry officer / inquiry committee, consisting of the following, is constituted under Rule 10(1)(a) of the ibid Rules:

- i. Muhammad Khalid Zamora PD, Land Record
- ii. Muhammad Shireq (DFO) awaiting posting

3. The inquiry officer / inquiry committee shall, in accordance with the provisions of ibid Rules, provide reasonable opportunity of hearing to the accused, record its findings and make within sixty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer / inquiry committee.



(NADEEM ASLAM CHAUDHARY)
CHIEF SECRETARY KHYBER PAKHTUNKHWA

Mr. Matiullah, Subject Specialist Physics
(BS-17), GHSS Nandraka, Kohat

23

Registered



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

No. SO(Inq)E&SED/1-17/2024/Sami ullah & Mati ullah Distt Karak
Dated Peshawar the October 01, 2024

To

Mr. Mati Ullah,
Subject Specialist (Physics)
GHSS Nandraka District Karak.

SUBJECT: SHOW CAUSE NOTICE.

GOVERNMENT OF KHYBER PAKHTUNKHWA

I am directed to refer to the subject noted above and to enclose herewith Show Cause Notice wherein the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) has tentatively decided to impose minor penalty of "withholding of two increments for a period of two years" under Rule-4 (i) (a) (ii) of the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011 in connection with the charges leveled against you.

2. Your reply to the show cause notice shall reach to this Department within ten (10) days of delivery of this letter otherwise ex-parte action shall be taken against you.

GOVERNMENT OF KHYBER PAKHTUNKHWA

Encl: as above: I am directed to refer to the subject noted above and to enclose herewith Show Cause Notice wherein the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) has tentatively decided to impose minor penalty of "withholding of two increments for a period of two years" under Rule-4 (i) (a) (ii) of the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011 in connection with the charges leveled against you.

GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst: of even No. & date: I am directed to refer to the subject noted above and to enclose herewith Show Cause Notice wherein the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) has tentatively decided to impose minor penalty of "withholding of two increments for a period of two years" under Rule-4 (i) (a) (ii) of the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011 in connection with the charges leveled against you.

Copy forwarded for information to the:

1. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Male), Karak with the request to deliver the show cause notices to the accused Subject Specialist under intimation to this office.
3. Section Officers Schools (Male), E&SE Department.
4. Principal GHSS Nandraka District Karak with the request to deliver the show cause notices to the accused Subject Specialist under intimation to this office.
5. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

Endst: of even No. & date:

Copy forwarded for information to the:

1. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Male), Karak with the request to deliver the show cause notices to the accused Subject Specialist under intimation to this office.
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5. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

Endst: of even No. & date:

(14)

Registered



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

No. SO(Inq)ESSED/1-17/2024/Samu Ullah & Mati Ullah Distt Karak
Dated Peshawar the October 01, 2024

To

Mr. Sami Ullah,
Subject Specialist (Chemistry)
GHSS Nandraka District Karak

SUBJECT: SHOW CAUSE NOTICE.

I am directed to refer to the subject noted above, and to enclose herewith Show Cause Notice wherein the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) has tentatively decided to impose minor penalty of "withholding of two increments for a period of two years" under Rule-4 (i) (a) (ii) of the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011 in connection with the charges leveled against you.

2 Your reply to the show cause notice shall reach to this Department within ten (10) days of delivery of this letter otherwise ex-parte action shall be taken against you.

Encl: as above:

(Bilal Khan)

Section Officer (Inquiries)

Endst: of even No. & date:

Copy forwarded for information to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar
2. District Education Officer (Male), Karak with the request to deliver the show cause notices to the accused Subject Specialist under intimation to this office.
3. Section Officers Schools (Male), E&SE Department.
4. Principal GHSS Nandraka District Karak with the request to deliver the show cause notices to the accused Subject Specialist under intimation to this office.
5. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

Section Officer (Inquiries)



(18)
Computerization of Land Records Project
Project Management Unit
Revenue & Estate Department, KP
Office: 9219242, 9219243

Dated: 23/11/2023

Inquiry Committee Attendance Sheet

S. No	Name	Designation	Phone No.	Signature
1	Samiullah	S.S (Chem)	03339713635	
2	Matiullah	SS (physics)	03349006475	
3				
4				
5				
6				
7				

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BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 2209/2023

Muhammad Adnan Senior Scale Stenographer..... Appellant

VERSUS

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

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

AFFIDAVIT

Service Appeal # 2209/2023

I, Fiaz Alam, Additional Secretary (Estab), Elementary & Secondary Education, Department do hereby solemnly affirm and declare that

Secondary Education, Department do hereby solemnly affirm and declare that

the contents of the accompanying that the inquiry Report, submitted by the

respondents, are true and correct to the best of my knowledge and belief and

nothing has been concealed from this Honorable Court.

It is further, stated on oath that in this appeal the answering

Respondents have neither been placed ex-parte nor has their defense

been struck off.

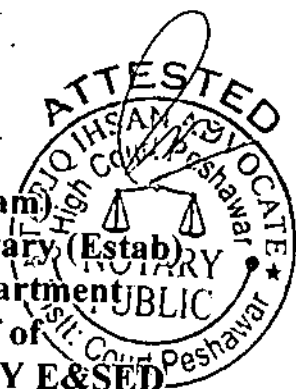
(Fiaz Alam)

Additional Secretary (Estab)

on behalf of

SECRETARY E&SE

(Respondent No. 04)



(17)



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

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

Dated Peshawar, the 27-08-2024.

NOTIFICATION

NO.SO(Lit-II)/E&SED/1-5/2021. I, Mr. Masood Ahmad, Secretary Elementary & Secondary Education Department is pleased to authorize Mr. Fiaz Alam, Additional Secretary (Establishment) Elementary & Secondary Education Department to sign parawise comments, replies, implementation reports, objection petitions, civil miscellaneous applications etc on my behalf for submission before various courts of law/tribunals in the best public interest.

(MASOOD AHMAD)
SECRETARY TO THE
GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst: of even No. & date.

Copy forwarded to the:-

1. Chief Secretary Khyber Pakhtunkhwa.
2. Advocate General Khyber Pakhtunkhwa.
3. Secretary Law Department.
4. Registrar Peshawar High Court Peshawar (with one each Spare copy for the Honorable Judges).
5. Registrar Service Tribunal Peshawar (with one each Spare copy for the Honorable Chairman/Members).
6. All Section Officers (Litigation) E&SE Department.
7. PS to Secretary, E&SE Department.
8. PA to Additional Secretary (General) E&SE Department.
9. PA to Deputy Secretary (Legal-I&II) E&SE Department.

SECTION OFFICER (Lit-II)



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

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY LETTER

It is certified that **Mr. Sajid Ullah, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary, Elementary & Secondary Education Department Peshawar in **Service Appeal # 2209/2023 Case Titled Muhammad Adnan vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar & Others.**

It is certified that **Mr. Sajid Ullah, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary, Elementary & Secondary Education Department Peshawar in **Service Appeal # 2209/2023 Case Titled Muhammad Adnan vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar & Others.**

(Fiaz Alam)
Additional Secretary (Estab)
E&SE Department
on behalf of
SECRETARY E&SED
(Respondent No. 04)

It is certified that **Mr. Sajid Ullah, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary, Elementary & Secondary Education Department Peshawar in **Service Appeal # 2209/2023 Case Titled Muhammad Adnan vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar & Others.**

(Fiaz Alam)
Additional Secretary (Estab)
E&SE Department
on behalf of
SECRETARY E&SED
(Respondent No. 04)