

4<sup>th</sup> July, 2022

Mr. Akhtar Ilays, Advocate present and submitted wakalatnama on behalf of the appellant present.

Learned counsel for the appellant submits that the impugned order dated 03.09.2021 was communicated to him on 13.10.2021 during the execution petition proceedings. The appellant was earlier dismissed from service. His service appeal was allowed with the direction to conduct de-novo enquiry, which was conducted and he was again dismissed on 03.09.2021. According to him he filed departmental appeal within thirty days of the communication and awaiting ninety days statutory period, within next thirty days he filed this appeal which is within time. This appeal is thus admitted to full hearing subject to all just and legal objections by the other side. Out district respondents be summoned through TCS, the expenses of which be deposited by the appellant within three days, while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 06.09.2022 before S.B. The appellant shall also deposit security within 10 days.



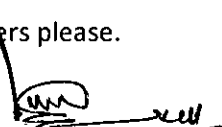
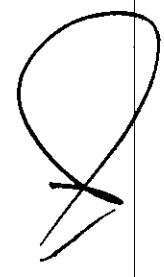

(Kalim Arshad Khan)  
Chairman

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 443 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/03/2022	<p>The appeal of Mr. Rahim Dad Khan resubmitted today by Mr. Muhammad Iqbal Safi Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper orders please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put up there on <u>20-05-2022</u> <i>at Peshawar</i> &amp; <i>the appellant's Counsel</i></p> <p style="text-align: right;">CHAIRMAN </p>
2-	20.05.2022	<p>Junior to counsel for the appellant present and requested for adjournment on the ground that senior counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 04.07.2022 before S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member (E)</p>

4<sup>th</sup> July, 2022

D.F.A  
Appellant alongwith his counsel present.

Learned counsel for the appellant submits that the impugned order dated 03.09.2021 was communicated to him on 13.10.2021 during the execution petition proceedings. The appellant was earlier dismissed <sup>for service</sup> and his service appeal was allowed with the direction to conduct de-novo enquiry which was conducted and he was again dismissed on 03.09.2021. <sup>Accordingly</sup> he filed departmental appeal within thirty days of the communication and awaiting ninety days <sup>of</sup> statutory period, within next thirty days he filed this appeal which is within time. This appeal is thus admitted to full hearing subject to all just and legal objections by the other side. Out district respondents be summoned through TCS, the expenses of which be deposited by the appellant within three days, while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 06.09.2022 before S.B.

*The appellant-  
shall also deposit security w/i 10  
days.*

(Kalim Arshad Khan)  
Chairman

07. For one post of the Junior Scale Stenographer (BS-14) from Zone IV from amongst the above selectees of the said Zone, the topper **Mr. Musaddaq Rehman Son of Gul Rait Khan** resident of District Karak and for the second post of Junior Scale Stenographer from Zone-III, from amongst the above selectees of Zone-III, the topper of the zone **Mr. Zia-Ul-Haq son of Muhammad Zarin** resident of District Shangla were unanimously recommended by the Committee for appointment as Junior Scale Stenographers (BS-14).

08. Similarly as per the final merit list for the post of Junior Clerk (BS-11), from amongst the above selectees the topper **Mr. Wajahat Ullah son of Safer Ullah Khan** resident of FR. Bannu (Zone-1) was unanimously recommended by the Committee for appointment as Junior Clerk (BS-11).

**Mr. Hassan Mehboob**  
Civil Judge/Judicial Magistrate, Peshawar  
Member DSC

**Mr. Mehmood Ur Rehman Kazi**  
Manager MIS  
Member DSC

**Mr. Kalim Arshad Khan**  
Chairman  
Khyber Pakhtunkhwa Service  
Tribunal Peshawar

VAKALAT NAMA

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Rahim Dad

Appellant(s)

VERSUS

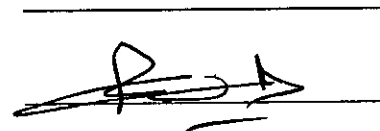
Govt of KP

Respondent(s)

I/We, Appellant, do hereby appoint and constitute **AKHTAR ILYAS** Advocate High Court **CHANGAIZ KHAN, UBAID HAYAT KHAN** Advocates, Peshawar, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated: 04/07/22



CLIENT(s)

Ilyas

ACCEPTED

**AKHTAR ILYAS**

BC: 11-1572



**CHANGAIZ KHAN**

BC: 19-1507



**UBAID HAYAT KHAN**

BC: 20-2131

The appeal of Mr. Rahim Dad Khan S/O Mohib Gul, DM GMS Kayan Mansehra received today i.e. on 09.03.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Checklist is not attached with the appeal.
2. Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
3. Copy of pervious departmental appeal annexed as F/G is not attached with the appeal which may be placed on it.
4. Page no. 5, 5A, 63 and 67 attached with the appeal are illegible which may be replaced by legible/better one.

No. 654 /S.T,

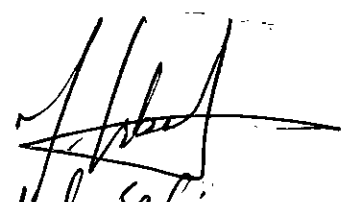
Dt. 10-3- /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. M. Iqbal Safi Adv. Pesh.

*The needful has been done and rectified  
So re-submitted please.*


*Respected Sir,  
Kindly for completion of  
file ~~request~~ please  
gave one week.  
Dated- 024.03-2022.  
M*

  
M. Iqbal Safi  
Advocate  
High Court

*7 days time further extended.  
Objection of removed.*

*All deficiencies are clear  
but only ~~part~~ S A no need.*

*Departmental appeal is annexed F/H on page #  
39-A to 39 D.*

  
24/3/2022.

*28/3/2022*

# KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

## CHECK LIST

Rahim dad  
..... Appellant

**Versus**

Govt of KPK  
..... Respondents

Sl No	CONTENTS	YES	NO
1	This petition has been presented by: _____ Advocate _____ Court	√	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3	Whether appeal is within time?	√	
4	Whether the enactment under which the appeal is filed mentioned?	√	
5	Whether the enactment under which the appeal is filed is correct?	√	
6	Whether affidavit is appended?	√	
7	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8	Whether appeal/annexures are properly paged?	√	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10	Whether annexures are legible?	√	
11	Whether annexures are attested?		
12	Whether copies of annexures are readable/clear?	√	
13	Whether copy of appeal is delivered to AG/DAG?	√	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15	Whether numbers of referred cases given are correct?	√	
16	Whether appeal contains cutting/overwriting?	x	
17	Whether list of books has been provided at the end of the appeal?	√	
18	Whether case relate to this court?	√	
19	Whether requisite number of spare copies attached?	√	
20	Whether complete spare copy is filed in separate file cover?	√	
21	Whether addresses of parties given are complete?	√	
22	Whether index filed?	√	
23	Whether index is correct?	√	
24	Whether Security and Process Fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26	Whether copies of comments/reply/rejoinder submitted? On _____		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table, have been fulfilled.

Name:- M. Iqbal Safi (AMC)

Signature:- M. Iqbal Safi

Dated:- 28-03-2022

**BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 443 /2022

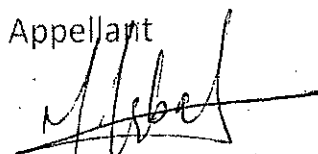
**Rahim Dad (Drawing Master)** S/O Mohib Gul, GMS, Kayan, District Mansehra

**VS**

Government of Khyber Pakhtunkhwa through Chief Secretary Et. Al.

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06.	Copy of Un-Served Show Cause	E	30-32
07.	Copy of WP	F	33-39
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Appellant  
Through   
(Muhammad Iqbal Safi)  
Advocate High Court



①

**BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Service Appeal No. 443 /2022

**Rahim Dad Khan** S/O Mohib Gul, Drawing Master, GMS Kayan Mansehra R/O  
Mohalla Hidayatullah Shah, G.T Road Peshawar

.....Appellant

VS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar
2. Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Civil Secretariat Peshawar
3. Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Main G.T Road Near Qilla Bala Hisar, Peshawar, Khyber Pakhtunkhwa
4. District Education Officer(DEO), Elementary & Secondary Education, District Mansehra, Kachehri Road, Mansehra
5. District Education Officer(DEO), Elementary & Secondary Education, District Battagram
6. District Accounts Officer (DAO), Mansehra, Kachehri Road District Mansehra
7. District Account Officer (DAO), District Battagram

.....Respondents

**SERVICE APPEAL UNDER SECTION 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED: 03/09/2021 WHEREBY THE APPELLANT HAS BEEN AWARDED MAJOR PENALTY OF DISMISSAL FROM SERVICE**

The appellant is pleased to beseech before this Honorable Court as under;

1. That the appellant was appointed on the post of "Drawing Master" (BPS-15) at "Government High School, Asharband, Allai District Battgram" vide Order Dated: 16/04/2013 against a vacant post among other employees/appointees and service book was lawfully issued with all the required entries which was rightly endorsed by the competent authority. **(Copy of Appointment Order & Service Book & Payslips is attached as F/A, F/B & F/C)**
2. That after performing duties in "GHS Asharband, District Battgram" for about one year, the appellant was transferred to "GMS Kayyan, District Mansehra" vide order Dated: 06/08/2014, properly issued by the Directorate of Elementary & Secondary Education and started performing his duties with zeal and zest. **(Copy of Transfer Order & LPC is attached as F/D)**
3. That the appellant performed his duties at "GMS Kayyan" for several months but the stroke of misfortune hit the appellant when he was issued an un-served Show-Cause Notice regarding his absence from duty vide Order Dated: 15/09/2015 whereby it was proposed that major penalty of removal from service might be imposed in case of no reply. Even the appellant has also drawn salaries from both the schools and also had got entire service record. **(Copy of Un-Served Show Cause Notice as F/E)**
4. That it is also indispensable to submit that the appellant's salary was unceremoniously stopped from the month of March 2015 which compelled ~~the~~ to file Writ Petition bearing No. 478-P/2017 which was in fact, withdrawn due to the wrong forum. It is also added that the appellant filed a number<sup>7</sup> applications for the release of his salary but remained heedless. **(Copy of Writ Petition is attached F/F)**
5. That feeling aggrieved, a proper departmental appeal was also filed which was rejected followed by Service Appeal No. 13/2018, was instituted in the Worthy Service Tribunal Khyber Pakhtunkhwa. **(Copy of Previous Departmental Appeal F/G)**
6. That it is of utmost importance to mention here that the Service Appeal No. 13/2018 was decided by the Honorable larger bench on 13/01/2021 wherein the appeal was remitted back to the department for conducting regularly<sup>inquiry</sup> within a time period of 90 day and also to associate the appellant in the inquiry proceedings. **(Copy of Previous Service Appeal & Judgment is attached as F/H)**

7. That it is indispensable to mention here that the appellant appeared before the inquiry committee on 26/02/2021 and also recorded his statement before the inquiry committee consisted of "Mr. Sajjad & Mr. Rashid". (Copy of Written Statement is attached as F/I)
  
8. That despite clear-cut directions issued by the worthy Tribunal to conclude the inquiry process within 90 days but the Respondents remained failed to do so, so Execution Petition No. 104/2021 was filed. (Copy of the Execution Petition is attached as F/J)
  
9. That it is further necessary to submit that the department remained failed to complete the inquiry within the specified period of 90 days. Further added that the department conducted another inquiry in which the impugned order was passed based on ex-parte proceedings against the appellant which culminated on the dismissal from service vide order Dated: 03/09/2021. (Copy of Impugned Order Dated: 03/09/2021 is attached as F/K)
  
10. That the impugned order was in fact, received by the appellant during the execution proceedings before the Worthy Service Tribunal on 13/10/2021, and the appellant preferred departmental appeal on 10/11/2021 which remained heedless. Hence, the instant Service Appeal properly within time. (Copy of Departmental Appeal Dated: 10/11/2021 is attached as F/L)
  
11. That it is also intrinsic to submit that the department has taken false and fabricated stance before the tribunal by stating and concealing the facet of conduction of inquiry by the concerned committee and ex-parte decision was passed which is altogether illegal and unlawful, which needs to be set-aside.
  
12. That even a number of applications have been submitted by the appellant to the concerned DEO via RTI to provide the outcome of the inquiry conducted by the committee but remained heedless for considerable time. At last through RTI, documents were received on 13/11/2021 where the appellant was astonished to know about the alleged show-cause notice, statement of allegation etc. (Copy of Applications to RTI & Response is attached as F/M)
  
13. That to conduct inquiry is a delicate and complex phenomenon wherein each and every facet is required to be kept in mind by the inquiry

committee. In the case in hand, no show-cause, statement of allegations and charge sheet has been given which has made all the inquiry proceedings a question mark.


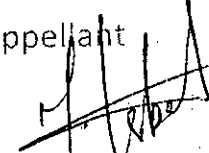
14. That the appointment of the appellant has rightly been made by the competent authority followed by his transfer to the "District Mansehra" which has rightly been issued by the competent authority as well.

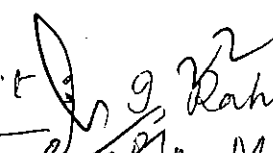
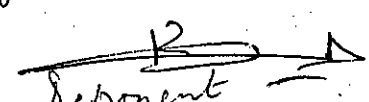
15. That the impugned dismissal notification/order is against the mandate of law and rules and has badly affected the fundamental rights of the appellant.

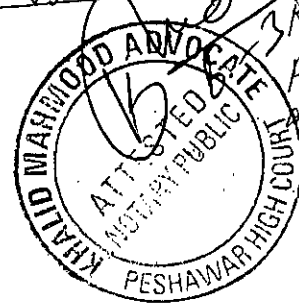
16. That it is also indispensable to submit that in similar and identical case, one employee known as "Fazal Wahab" (SPST), District Battagram has already been re-instated by this Honorable Service Tribunal followed by the Department as well who is currently performing duties.

**PRAYER:**

It is, therefore, most humbly requested that on acceptance of this Service Appeal, the impugned order Dated: 03/09/2021 whereby the appellant has been dismissed from service may kindly be set-aside and the appellant may kindly be reinstated on the post of "Drawing Master" (BPS-15) with all back benefits. Any other order which is also detrimental to the service record of the appellant may also be set-aside please.

Through   
Appellant  
  
(Muhammad Iqbal Safi)  
Advocates High Court

*Agg'davit*  
  
Rahimdad S/o Mohib Gul  
3R/10 Mohalla Hidayatullah Shahi, GT  
Road Peshawar do hereby solemnly  
affirm & declare that the contents  
of the service appeal are true &  
correct to the best of my knowledge.  
  
Deponent



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.

Annexure

5

OFFICE ORDER/APPOINTMENT

Consequent upon the recommendation/ approval of the District selection Committee BATTAGRAM in its meeting held on 27.12.2012, the Competent Authority is pleased to appoint the following fresh trained Male DM candidates on merit having the prescribed qualification in BPS 15 (Rs.8500-700-29500), plus usual allowances as admissible under the rules against the vacant post of D.M (Male) mentioned against each their names on regular basis under the existing policy of the Provincial Govt. on terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

S. N	Candidate Name	Father's Name	Qualification	Score	Address	School/Station where posted	Remarks
1	Maseer Ahmed	Sher Dad	MSc. DM	80.36	Ajmern Battagram	GHS Karg	Against v/post
2	Muhammad Ismail	Abdur Rehman	MA, DM	61.76	Thakot Battagram	GMS Nehar	-do-
3	Saleh Ahmad	Rahim Gul	MA, DM	59.47	Pasho Allai	GMS Koshgram	-do-
4	Khurshid Ali Khan	Ahmad Rizwan	MA, DM	59.37	Ropkani Allai	GHS Karg	-do-
5	Zanwar Zeb	Sher Rehman	BA, DM	48.23	Peshawr	GHS Hujal Batkool	-do-
6	Saeed	Hazrati Azam	MA, DM	47.85	Thakot Battagram	GMS Soorgai	-do-
7	Lahim Dad	Muhib Gul	BA, DM	45.11	Peshawar City	GHS Asharban	-do-

TERMS AND CONDITIONS:

1. Their services will be considered regular but without pension & gratuity in terms of section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
2. The appointees who are already in Govt. service and working against a pensionable post on regular basis before 1<sup>st</sup> day of July 2001 without any service break, on application to the Competent Authority/this office through proper channel are appointed and allowed choice of option either to retain benefit of pension and gratuity as allowed to them under their previous terms of appointment or to avail the benefit of contributory provident fund allowed to them under new appointment.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.
4. The appointees should join their posts within 15 days of the issuance of this order. The Headmaster Concerned. Would furnish a certificate to the effect that the candidates have joined the posts, otherwise after 15 days of the issuance of this Order, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
5. They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1989.
6. They will be governed by such rules and regulations as may be issued from time to time by the Government.

Attendant

[Signature]

5 A-1

BETTER COPY

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM

OFFICE ORDER/APPOINTMENT

Consequent upon the recommendation/approval of the District Selection Committee Battagram in its meeting held on 27/12/2012, the competent authority is pleased to appoint the following fresh trained male DM candidates on merit having the prescribed qualification in BPS-15 (Rs 8500-700-29500) plus usual allowances as admissible under the rules against the vacant posts of DM (Male) mentioned against each their names on regular basis under the existing policy of the provincial government on terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

S.NO	CANDIDATE NAME	FATHER NAME	QUALIFICATION	SCORE	ADDRESS	SCHOOL/STATION WHERE POSTED	REMARKS
01.	Naseer Ahmad	Sherdad	MSc. DM	80.36	Ajmera, Battagram	GHS, Karg	Against V/Post
02.	Muhammad Ismail	Abdur Rehman	M.A DM	61.76	Thakot, Battagram	GMS, Nehar	Do
03.	Salah Ahmad	Rahim Gul	MA DM	59.47	Pasho Allai	GMS, Koshgram	Do
04.	Khursheed Ali Khan	Ahmad Rizwan	MA DM	59.37	Ropkani Allai	GHS Karg	Do
05.	Anwar Zeb	Sher Rehman	BA DM	48.23	Peshawar	GHS Hutal Batool	Do
06.	Saeed	Hazrati Azam	MA DM	47.85	Thakot Battagram	GMS Soorgai	Do
07.	Rahimdad	Muhib Gul	BA DM	45.11	Peshawar	GHS Asharban	Do

Terms & Conditions:

1. Their services will be considered regular but without pension and gratuity in term of section 19 of the NWFP Civil Servant Act 1973 as amended vide NWFP Civil Servants (Amendment Act 2005). They will however, entitle to contributory provident fund in such a manner and at such rates as prescribed by the government.
2. The appointees who are already in government service and working against pensionable post on regular basis before 1<sup>st</sup> day of July 2001 without any service break, on application to the competent authority/ this office through proper channel are appointed and allowed choice of option either to retain the benefit of pension and gratuity as allowed to them under their previous terms of appointment or to avail the benefit of contributory provident fund allowed to them under new appointment.

SA

8

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- ... ..
1. ... ..
  2. ... ..
  3. ... ..

... ..  
 Dy District Education Officer  
 (Male) District Battagram

(B) (6)  
Annexure  
**SERVICE BOOK**

OF

Mr. RAHIM DAD

S/o MANIR GUL

Designation DM

Department Education

Price : Rs. 50/-

PRINTED BY:  
STATIONERY & PRINTING DEPARTMENT, GOVERNMENT OF KHYBER PAKHTUNKHWA,  
PESHAWAR



(For use in Police Department only).

Heirs,

- 1.
- 2.
- 3.

Verification Roll No.

dated

received back

Left Thumb Impression

Qualification	Date	Qualification	Date
English		(1) Passed Exam SSC under R.No. 160030 Session 1995 (F) First Arts from BSE Peshawar. Marks obtained 406/850.	
Pushto		(2) B.L. & B.A. Passed Ex Exam under R.No. 7026 Session 1998 from BSE Peshawar.	
Urdu		(3) Pleadership examination Marks obtained 435/1100.	
Plan-drawing		(4) Training School Final examination Passed in 1st position under R.No. 00597 Session 2006-2007 from Skill Development Association Punjab. Marks obtained 827/1000 A Grade.	
Finger Print			
Drill Instructing			
Court Duties			
Reserve Duties			

  
 GH'S  
 Asharban (Allan)  
 Bhattagram

Note: The entries on this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

8



Name: RAHIM DAD

Race: Afghan

Residence: Battagram

Father's name and residence:

MOHIR GUL

Date of birth by Christian era as nearly as can be ascertained:

06-01-1977


Exact height by measurement:

5-5"


Personal marks for identification:

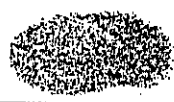
NIL

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: 

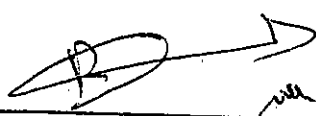
Ring Finger: 

Middle Finger: 

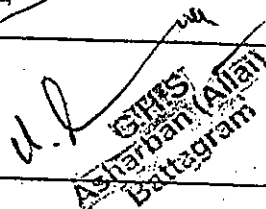
Fore Finger: 

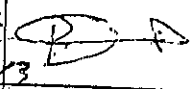


Thumb: 

Signature of Government Servant:



Signature and designation of the Head of the office, or other Attesting Officer.

  
GHS  
Asharban (Atari)  
Battagram

1	2	3	4	5	6	7	8
Name of Post	Substantive Whether substan- tive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
DM Ch. S. Ashokan (Alai) Bolepalli.		BPS-15 (8500-700-29500)					
			Rs = 8500/-			18 <sup>3</sup> / <sub>2013</sub>	
- do -						12 <sup>12</sup> / <sub>2013</sub>	
dm						31 <sup>7</sup> / <sub>2014</sub>	

9 Name and Designation of head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer.	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period		
U.I. G.H.S Asharban (Allai) Battagram	Appointed 18/3/2013		U.I. G.H.S Asharban (Allai) Battagram		Appointed as DM Teacher at G.H.S Asharban (Allai) Battagram (as BPS-4) (8500-700-29500) vide DEO/Manila Battagram Order No. 8892-97 dt: 16-03-2013.	U.I. G.H.S Asharban (Allai) Battagram	
U.I. G.H.S Asharban (Allai) Battagram			U.I. G.H.S Asharban (Allai) Battagram			U.I. G.H.S Asharban (Allai) Battagram	
U.I. G.H.S Asharban (Allai) Battagram	30/11/2013	A/Order	U.I. G.H.S Asharban (Allai) Battagram			Service Verified w.e.f. 18-3-2013 to 30-11-2013 From the A/Roll and other record of this office.	
U.I. G.H.S Asharban (Allai) Battagram	31/7/2014	Transferred to Manselna at G.H.S. Kaian vide Director Order No. 4372-89 dt: 6/8/2014.	U.I. G.H.S Asharban (Allai) Battagram			Service Verified w.e.f. 01-12-2013 to 31-7-2014 From the A/Roll and other record of this office.	
			U.I. G.H.S Asharban (Allai) Battagram			U.I. G.H.S Asharban (Allai) Battagram	

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1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
D.M. BMS Karan District Mansarovar		BPS-15 (7500 - 700 - 291500)	Rs 9200/- PM			12/9 2014	✓
- 20 -		Rs 9900/- PM				12/11 2014	✓



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# Annexure

Manshra  
 P Sec:002 Month:September 2014  
 MA7166 -Govt Middle School (M) Man  
 Education Schools

SF:2  
 Name: RAHIM DAD  
 Drawing Master  
 CNIC No.1730135769383  
 GPF Interest Applied  
 15 Vocational Temporary

MA7166

**PAYS AND ALLOWANCES:**

0001-Basic Pay	9,200.00
1000-House Rent Allowance	1,565.09
1210-Convey Allowance 2015	2,855.00
1300-Medical Allowance	1,200.00
1923-UAA-OTHER 201 (1-15)	1,060.00
1971-Adhoc Allowance 2011 15%	783.00
1973-Adhoc Allowance 2010 15%	2,610.00
2118-Adhoc Relief Allow (2112)	1,840.00
2148-15% Adhoc Relief All-2013	1,380.00
Gross Pay and Allowances	23,355.00

**DEDUCTIONS:**

GPF Balance	3,040.00	Subtr:	1,520.00
3501-Benevolent Fund			180.00
3511-Addl Group Insurance			13.00
3604-Group Insurance			115.00
3950-Emp. Edu. Fund KPK			100.00
Total Deductions			1,928.00
			21,427.00

D.O.B 07.01.1988  
 03 Years 06 Months 017 Days

LFP Quota:  
 ALLIED BANK LIMITED Gur Mandi Peshawar C  
 0010097493940026

Manshra  
 P Sec:002 Month:September 2014  
 MA7166 -Govt Middle School (M) Man  
 Education Schools

SF:2  
 Name: RAHIM DAD  
 Drawing Master  
 CNIC No.1730135769383  
 GPF Interest Applied  
 15 Vocational Temporary

MA7166

**PAYS AND ALLOWANCES:**

2174-Adhoc Relief Allow-2014	920.00
Gross Pay and Allowances	23,355.00

**DEDUCTIONS:**

GPF Balance	3,040.00	Subtr:	1,520.00
Total Deductions			1,928.00
			21,427.00

D.O.B 07.01.1988  
 03 Years 06 Months 017 Days

LFP Quota:  
 ALLIED BANK LIMITED Gur Mandi Peshawar C  
 0010097493940026

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P Sec:002 Month:October 2014  
MA7166 -Govt Middle School (M) Man  
Education Schools

NIN:  
GPF #:  
Old #:

MA7166

Basic Salary	9,200.00
House Rent Allowance	1,566.00
Dearment Allowance 2005	2,856.00
Medical Allowance	1,200.00
DA-DRA 20% (1-15)	1,000.00
Adhoc Allowance 2011@ 15%	783.00
Adhoc Allowance 2010@ 50%	2,610.00
Adhoc Relief Allow (2012)	1,840.00
Adhoc Relief All-2013	1,380.00
Gross Pay and Allowances	23,355.00

DEDUCTIONS:

GPF Balance 4,560.00	Subrc: 1,520.00
3501-Benevolent Fund	180.00
3511-Addl Group Insurance	13.00
3604-Group Insurance	115.00
3990-Emp. Du. Fund KPZ	100.00

Total Deductions	1,928.00
	21,427.00

D.O.B 07.01.1988 LFP Quota: ALLIED BANK LIMITED Gur Mandi Peshawar C  
03 Years 07 Months 018 Days 0010097493940026

Manshra

St:2

P Sec:002 Month:October 2014  
MA7166 -Govt Middle School (M) Man  
Education Schools

Pers #: 00718867  
Name: RAHIM DAD  
DRAWING MASTER  
CNIC No.1730135769383  
GPF Interest Applied

NIN:  
GPF #:  
Old #:

MA7166

15 Vocational Temporary  
PAYS AND ALLOWANCES:  
2174-Adhoc Relief Allow-2014

920.00

Gross Pay and Allowances

23,355.00

DEDUCTIONS:

GPF Balance 4,560.00	Subrc:
----------------------	--------

Total Deductions	1,928.00
	21,427.00

D.O.B 07.01.1988 LFP Quota: ALLIED BANK LIMITED Gur Mandi Peshawar C  
03 Years 07 Months 018 Days 0010097493940026

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Manshra  
P Sec:002 Month:November 2014  
MA7166 -Govt Middle School (M) Man  
Education Schools

S#1  
Pers #: 00718807 Buckle:  
Name: RAHIM DAD  
DRAWING MASTER  
CNIC No.1730135769383  
GPF Interest Applied  
15 Vocational Temporary

MA7166  
PAYS AND ALLOWANCES:  
0001-Basic Pay 9,200.00  
1000-House Rent Allowance 1,556.00  
1210-Convey Allowance 2005 2,856.00  
1300-Medical Allowance 1,200.00  
1923-UAA-OTHER 20(1-15) 1,000.00  
1571-Adhoc Allowance 20118 15% 783.00  
1573-Adhoc Allowance 20108 50% 2,610.00  
2118-Adhoc Relief Allow (2012) 1,840.00  
2148-15% Adhoc Relief All-2013 1,380.00  
Gross Pay and Allowances 23,355.00

DEDUCTIONS:  
GPF Balance 6,080.00  
3501-Benevolent Fund Subrc: 1,520.00  
3511-Addl Group Insurance 180.00  
3604-Group Insurance 13.00  
3950-Emp Edu. Fund EPK 115.00  
100.00

Total Deductions 1,928.00  
21,427.00

D.O.B 07.01.1988 LFP Quota:  
03 Years 08 Months 017 Days ALLIED BANK LIMITED Gur Mandi Peshavar C  
0010097493940026

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Manshra  
P Sec:002 Month:November 2014  
MA7166 -Govt Middle School (M) Man  
Education Schools

S#2  
Pers #: 00718807 Buckle:  
Name: RAHIM DAD  
DRAWING MASTER  
CNIC No.1730135769383  
GPF Interest Applied  
15 Vocational Temporary

MA7166  
PAYS AND ALLOWANCES:  
2174-Adhoc Relief Allow-2014 920.00  
Gross Pay and Allowances 23,555.00

DEDUCTIONS:  
GPF Balance 6,080.00 Subrc:  
1,520.00

Total Deductions 1,928.00  
21,427.00

D.O.B 07.01.1988 LFP Quota:  
03 Years 08 Months 017 Days ALLIED BANK LIMITED Gur Mandi Peshavar C  
0010097493940026

September 2014  
Middle School (M) Man  
Education Schools

7166  
920.00

Sheet no. 1

S#1 Manshra  
 Pers #: 00718807 Buckle:  
 Name: RAHM DAD  
 DRAWING MASTER  
 CNIC No.1730135769383  
 GPF Interest Applied  
 15 Vocational Temporary

P Sec:002 Month:December 2014  
 MA7166 -Govt Middle School (H) Man  
 Education Schools

NTN:  
 GPF #:  
 Old #:

PAYS AND ALLOWANCES:	
0001-Basic Pay	MA7166
1000-House Rent Allowance	9,500.00
1210-Convey Allowance 2005	1,555.00
1300-Medical Allowance	2,826.00
1923-AAA-OTHER 20% (1-15)	1,200.00
1971-Adhoc Allowance 2011# 15%	1,000.00
1973-Adhoc Allowance 2010# 50%	783.00
2118-Adhoc Relief Allow (2012)	2,520.00
2148-15% Adhoc Relief All-2013	1,550.00
Gross Pay and Allowances	1,465.00
DEDUCTIONS:	24,370.00

GPF Balance	7,600.00
3501-Benevolent Fund	
3511-Addl Group Insurance	Subrc: 1,520.00
3604-Group Insurance	180.00
3990-Emp. Edu. Fund KPK	13.00
	115.00
	100.00

Total Deductions 1,928.00  
 22,442.00

D.O.B 07.01.1988 LFP Quota:  
 03 Years 09 Months 018 Days ALLIED BANK LIMITED Gur Mandi Peshawar C  
 0010097493940026

*Handwritten signature/initials*

S#2 Manshra  
 Pers #: 00718807 Buckle:  
 Name: RAHM DAD  
 DRAWING MASTER  
 CNIC No.1730135769383  
 GPF Interest Applied  
 15 Vocational Temporary

P Sec:002 Month:December 2014  
 MA7166 -Govt Middle School (H) Man  
 Education Schools

NTN:  
 GPF #:  
 Old #:

PAYS AND ALLOWANCES:	
2174-Adhoc Relief Allow-2014	MA7166
	990.00

* Gross Pay and Allowances	
DEDUCTIONS:	24,370.00
GPF Balance	7,600.00
	Subrc:

Total Deductions 1,928.00  
 22,442.00

D.O.B 07.01.1988 LFP Quota:  
 03 Years 09 Months 018 Days ALLIED BANK LIMITED Gur Mandi Peshawar C  
 0010097493940026

17

Sheet no. 1

SN:1 Manshra

Pers #: 00718807  
Name: RAHIM DAD  
DRAWING MASTER  
CNIC No. 1730135769383  
GPF Interest Applied  
15 Vocational Temporary

P Sec:002 Month:January 2015  
MA7166 -Govt Middle School (M) Man  
Education Schools

NTN:  
GPF #:  
Old #:

PAYS AND ALLOWANCES:	
0001-Basic Pay	MA7166
1000-House Rent Allowance	9,900.00
1210-Convey Allowance 2005	1,566.00
1300-Medical Allowance	2,855.00
1923-UAA-OTHER 20i(1-15)	1,200.00
1571-Adhoc Allowance 2011i 15i	1,000.00
1973-Adhoc Allowance 2010i 50i	783.00
2118-Adhoc Relief Allow (2012)	2,610.00
2148-15i Adhoc Relief All-2013	1,980.00
Gross Pay and Allowances	1,485.00
DEDUCTIONS:	24,370.00

GPF Balance 9,120.00  
3501-Benevolent Fund  
3511-Addl Group Insurance  
3604-Group Insurance  
3990-Emp.Edu. Fund KPK

Subtr: 1,520.00  
180.00  
13.00  
115.00  
100.00

Total Deductions

1,928.00  
22,442.00

D.O.B 07.01.1968  
03 Years 10 Months 018 Days

LFP Quota:  
ALLIED BANK LIMITED Gur Mandi Peshawar C  
0010097493940026

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SN:2 Manshra

Pers #: 00718807  
Name: RAHIM DAD  
DRAWING MASTER  
CNIC No. 1730135769383  
GPF Interest Applied  
15 Vocational Temporary

P Sec:002 Month:January 2015  
MA7166 -Govt Middle School (M) Man  
Education Schools

NTN:  
GPF #:  
Old #:

PAYS AND ALLOWANCES:	
2174-Adhoc Relief Allow-2014	MA7166
	990.00

Gross Pay and Allowances

24,370.00

DEDUCTIONS:  
GPF Balance 9,120.00

Subtr:

Total Deductions

1,928.00  
22,442.00

D.O.B 07.01.1968  
03 Years 10 Months 018 Days

LFP Quota:  
ALLIED BANK LIMITED Gur Mandi Peshawar C  
0010097493940026

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Batagram  
 S#:1  
 Pers #: 00718807 Buckle:  
 Name: RAHIM DAD  
 DRAWING MASTER  
 CNIC No.1730135769383  
 GPF Interest Applied  
 15 Vocational Temporary

P Sec:002 Month:August 2014  
 BM7067 -Head Master GHS Hatal Bath  
 Education Schools:  
 NTN:  
 GPF #:  
 Old #:

PAYS AND ALLOWANCES:  
 0001-Basic Pay  
 1000-House Rent Allowance  
 1210-Convey Allowance 2005  
 1300-Medical Allowance  
 1923-UAA-OTHER 20%(1-15)  
 1971-Adhoc Allowance 2011@ 15%  
 1973-Adhoc Allowance 2010@ 50%  
 2118-Adhoc Relief Allow (2012)  
 2148-15% Adhoc Relief All-2013  
 Gross Pay and Allowances  
 DEDUCTIONS:  
 GPF Balance 1,520.00  
 3501-Benevolent Fund  
 3511-Addl Group Insurance  
 3604-Group Insurance  
 3990-Emp.Edu. Fund KPK

EM7067 -  
 9,200.00  
 1,566.00  
 2,856.00  
 1,200.00  
 1,000.00  
 783.00  
 2,610.00  
 1,840.00  
 1,380.00  
 23,355.00  
 Subrc: 1,520.00  
 180.00  
 13.00  
 115.00  
 100.00

Total Deductions 1,928.00  
 21,427.00  
 D.O.B 07.01.1988  
 LFP Quota: Payment through DDO.  
 01 Years 05 Months 016 Days

Batagram  
 S#:2  
 Pers #: 00718807 Buckle:  
 Name: RAHIM DAD  
 DRAWING MASTER  
 CNIC No.1730135769383  
 GPF Interest Applied  
 15 Vocational Temporary  
 PAYS AND ALLOWANCES:  
 2174-Adhoc Relief Allow-2014

P Sec:002 Month:August 2014  
 BM7067 -Head Master GHS Hatal Bath  
 Education Schools  
 NTN:  
 GPF #:  
 Old #:

EM7067 -  
 920.00  
 Gross Pay and Allowances  
 DEDUCTIONS:  
 GPF Balance 1,520.00

BM7067 -  
 920.00  
 23,355.00  
 Subrc:

Total Deductions 1,928.00  
 21,427.00  
 D.O.B 07.01.1988  
 LFP Quota: Payment through DDO.  
 01 Years 05 Months 018 Days

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**Annexure**

STATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER

Mr. Rahim Dad, DM Govt: High School Asharaban District Battagram is hereby transferred / adjusted against the vacant post of DM at Govt: Middle School Kaian District Mansehra in his own pay & BPS in the interest of public service with effect from the date of his taking over charge.

- Note:
1. Charge report should be sent to all concerned.
  2. No TA/DA etc is allowed.
  3. Necessary entry to this effect should be made in his service book

DIRECTOR  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst No. 4372-2 of F.No. Other District Transfer, Dated 6/8 /2014

Copy of the above is to the :-

1. District Education Officer (Male) Battagram & Mansehra.
2. District Account Officer, Battagram & Mansehra.
3. PA to Director (E&SE) Pkhyber Pakhtunkhwa, Peshawar.
4. Head Master concerned school.
5. Official concerned.
6. Master File.

*M. Dad* 6/8  
Deputy Director (Establishment)  
(E&SE) Khyber Pakhtunkhwa.

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Annexure

(19)

Arrival Report

R/sir

In compliance with the order  
of Director Elementary & Secondary  
Education Khyber Pakhtunkhwa Peshawar  
Issue vide F.No. 4372-SO-F.No. 0124  
District Transfer Dated 6-8-2014. I beg to  
submit my arrival report for duty today  
on 17-8-2014 as DM please.

Head Master  
Govt. Boys School  
Kayan Manshira

Rahim Dacl Durr  
CPMS, Kalam Darsi  
Manshira

ATC

[Signature]

20

SF: 1 Manshra  
 P Sec: 002 Month: February 2015  
 MA7166 - Govt Middle School (M) Man  
 Education Schools  
 Pers #: 00718807 Buckle:  
 Name: RAHM DAD DRAWING MASTER  
 CNIC No. 1730135769383  
 GPF Interest Applied  
 15 Vocational Temporary  
 NIN:  
 GPF #:   
 Old #:

PAYS AND ALLOWANCES:		MA7166
0001-Basic Pay		9,900.00
1000-House Rent Allowance		1,566.00
1300-Medical Allowance		1,200.00
1923-DAA-OTHER 205(1-15)		1,000.00
1971-Adhoc Allowance 20118-151		783.00
1973-Adhoc Allowance 20108-504		2,610.00
2118-Adhoc Relief Allow (2012)		1,980.00
2148-151 Adhoc Relief All-2013		1,485.00
2174-Adhoc Relief Allow-2014		990.00
Gross Pay and Allowances		21,514.00

DEDUCTIONS:		Subrc:
GPF Balance	10,640.00	1,520.00
3501-Benevolent Fund		180.00
3511-Addl Group Insurance		13.00
3604-Group Insurance		115.00
3990-Emp. Edu. Fund KPK		100.00

Total Deductions 1,928.00  
 19,586.00

D.O.B 07.01.1988 LEP Quota:  
 03 Years 11 Months 015 Days ALLIED BANK LIMITED Gux Mandi Peshavar C  
 0010097493940026

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LAST PAY CERTIFICATE

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Last Pay Certificate of Rahim Dada Durrani Personal No: 718807  
of the S.H.S. Ashraf Khan  
proceeding to Transfer to S.H.S. Khatana  
He has been paid upto 31-07-2014

as the following rates:-

Particulars:	Pay	Rs.
Substantive Pay:-	HRA	Rs. 9200 /-
Deputing Pay:-	Cont.	Rs. 1566 /-
Exchange Compensation Allowance:-	Medical	Rs. 2856 /-
	U.A.A.	Rs. 1200 /-
	U.A.A.	Rs. 1000 /-
	With 2010 15%	Rs. 783 /-
	With 2010 50%	Rs. 2610 /-
	With 2012 20%	Rs. 1840 /-
	With 2013 5%	Rs. 1380 /-
	With A.P. 2014	Rs. 900 /-
	<b>Total</b>	<b>Rs. 23355 /-</b>

3501 - B.F. Rs. 1520 /-  
 3511 - Adm. C. Inv. Rs. 185 /-  
 3604 - Comp. Inv. Rs. 13 /-  
 3940 - Deductions:- Rs. 115 /-  
 1525 /-

1. He made over charge of the Office of S.H.S. Khatana  
on the \_\_\_\_\_ near of \_\_\_\_\_

2. He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

From \_\_\_\_\_ to \_\_\_\_\_ at Rs. \_\_\_\_\_ a month  
 From \_\_\_\_\_ to \_\_\_\_\_ at Rs. \_\_\_\_\_ a month  
 From \_\_\_\_\_ to \_\_\_\_\_ at Rs. \_\_\_\_\_ a month

3. He is entitled to draw the following:-

4. He is also entitled to joining time for \_\_\_\_\_ days.

5. The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

No. - 25 Dated 28-8-2014  
Forwarded to The D.E.O (M) Manshara for n/a per

Dated at 2/8/2014 19

Signature: H.M. F. Akbar  
Designation: Govt. P.O. Manshara

ATC  
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جسٹریٹری حکومت سندھ

کوئٹہ ڈیپارٹمنٹ برائے سکول مائیکرو

23

۳۰/۹/۲۰۱۴

ریٹائرڈ عملے					سروس شدہ عملے				
RSM					PEV				
ردیف	نام	آئی ڈی نمبر	تاریخ	نوٹس	ردیف	نام	آئی ڈی نمبر	تاریخ	نوٹس
۱	P	7/15	R	7/30	B1	11/5	B1	7/30	
۲	P	11/5	R	7/30	B1	7/15	B1	7/30	
۳	A	11/5	R	7/30	B1	11/5	B1	7/30	
۴	B	11/5	R	7/30	B1	11/5	B1	7/30	
۵	P	11	R	7/30	B1	11/5	B1	7/30	
۶	P	11/5	R	7/30	B1	11/5	B1	7/30	
۷	P	11/5	R	7/30	B1	11/5	B1	7/30	
۸	P	11/5	R	7/30	B1	11/5	B1	7/30	
۹	P	11/5	R	7/30	B1	11/5	B1	7/30	
۱۰	C	Leave	C	Leave	B1	11/5	B1	7/30	
۱۱	P	11/5	R	7/30	C	Leave	C	Leave	
۱۲	P	11/5	R	7/30	B1	7/15	B1	7/30	
۱۳	P	11/5	R	7/30	B1	11/5	R	7/30	
۱۴	P	11/5	R	7/30	B1	11/5	R	7/30	
۱۵	P	11/5	R	7/30	B1	11/5	R	7/30	
۱۶	P	11/5	R	7/30	B1	11/5	R	7/30	
۱۷	P	11/5	R	7/30	B1	11/5	R	7/30	
۱۸	P	11/5	R	7/30	B1	11/5	R	7/30	
۱۹	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۰	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۱	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۲	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۳	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۴	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۵	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۶	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۷	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۸	P	11/5	R	7/30	B1	11/5	R	7/30	
۲۹	P	11/5	R	7/30	B1	11/5	R	7/30	
۳۰	P	11/5	R	7/30	C	Leave	C	Leave	
۳۱	C	Leave	C	Leave	B1	11/5	B1	7/30	
۳۲	C	Leave	C	Leave					

موجودہ

مقام	میان	میان	میان	میان	میان	میان	میان
		4	2	2	12	9	3
		-	-	-	-	-	-
		-	-	-	-	-	-
		4	2	2	12	9	3

وزیر تعلیم، سندھ  
۳۰-۹-۲۰۱۴

رکن کونسل





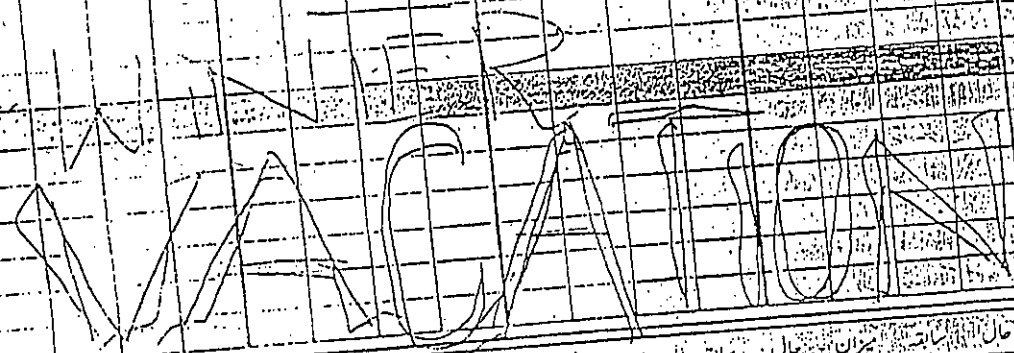
58

26

۲۰۱۳  
رجسٹر حاضر کی فہرست سہ ماہی  
۲۰۱۴

وقت	مدرسہ	مدرسہ	مدرسہ	مدرسہ	رجسٹر حاضر کی فہرست		رجسٹر حاضر کی فہرست				
					Drawing	Physical Education	Physical Education	Physical Education			
				R	1-35	R	8:00	B1	1-35	B1	8/1
				C	Leave			C	Leave		
				R	11:35	A	8:00	B1	11:35	B1	8/1
				C	Leave			B1	11:35	B1	8/1
				R	11:40	R	8:00	B1	11:40	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1
				R	11:35	R	8:00	B1	11:35	B1	8/1

Attended  
by



ماہ	ماہ	ماہ	ماہ	ماہ	ماہ	ماہ	ماہ	ماہ	ماہ	ماہ
9	8	1	9	17	2					
9	8	1	9	17	2					

وزیر تعلیم سندھ

دستخط مسیٹر





29-A

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

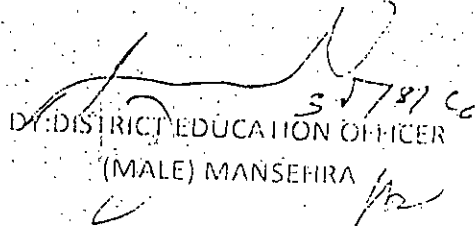
No. 9513

Dated 30/8/2014

To  
The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject: VERIFICATION

Memo:  
Order issued vide your office Endst:No.4372-36 /i.No.Other  
District Transfer dated 06-08-2014 is hereby submitted for verification.  
please:

  
35787 CC  
DY. DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA



29-B

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

No. 4583  
Date 9/9/2014

The District Education Officer,  
(Male) Mansehra.

Subject: VERIFICATION

Reference your letter No.9513, dated 30.8.2014 on the subject cited above.  
Order issued vide this office Endst No.4372-30?F.No/other district transfer, dated 06.08.2014  
is hereby found to correct.

*M=MA*

Deputy Director (Establishment)  
(E&SE) Khyber Pakhtunkhwa



(E)

(30)

Annexure

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT MANSEHRA

To Mr. Rahim Dad DM: GMS Kayan Mansehra.

Wb \_\_\_\_\_  
Dated \_\_\_\_\_/12/15

Subject:- SHOW CAUSE NOTICE

The District Education Officer (Male) Elementary & Secondary Education District Mansehra, under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 do hereby serve you Mr. Rahim Dad DM GMS Kayan Mansehra

ii)- As reported by the Head Master GMS Kayan, you was found absent from duty w.e.f. 01.05.2015, irregular, non cooperative and disobedience and shows negligence in performing your duties and are habitual in non performing your duties.

iii)- On going through report, I am satisfied as per rule 7 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 that you have committed the following acts/omissions specified under rule 03 of the said rules.

- a)- Misconduct
- b)- Corruption
- c)- Inefficient


As a result therefore, I as competent authority, have tentatively decided to impose upon you the major penalty of REMOVAL FROM SERVICE under the rules 4 of the said rules.

- 1 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 or not.
- 2 If no replay to this notice is received within seven days or not more than fifteen days of receipt delivery, it shall be presumed that you have no defense to put in and in that case an ex-prate action shall be taken against you.

Sd/-  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst: No. 14331-34 /Estt: Branch/Show Cause Dated Mansehra the 15/9/2015  
Copy forwarded for information to:

- 1 The Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2 Head Master Govt: Middle School Kayan,
- 3 Mr. Rahim Dad DM GMS Kayan.
- 4 Office Copy

  
DY: DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

ATC  


Annexure

To

The District Education Officer  
(Male) District Mansehra.

Subject:-

SHOW CAUSE NOTICE  
Provision of Information Under RTI Act,  
2013

R/Sir,

Reference your show cause Notice No.NIL  
dated NIL while endst:No.14331-34 dated 15.09.2015

It is submitted for your kind information  
that I was issued Show Cause Notice but there is no any other  
documents i.e.Explanation,Charge Sheet has not been received  
to me and I am a poor man and facing hardship in maintaining  
my family.On the other hand I am unaware of the facts  
whether I am suspended,Terminated from service or otherwise  
if so I may kindly be provided all the orders/documents as  
I am going to knock the door of Hon'able Peshawar High Court  
Peshawar as my salaries from 2015 till date is not paid to  
me and now I am not in position to maintain my family in  
absence of service.

It is,therefore most humbly requested that  
I may kindly be informed whether I am in service or my  
services is terminated.

Yours Obediently,

Rahim Dad S/O Muhib Gul  
R/O G.T.Road Mohallah  
Hidayatullah Shah Pesh:

Dated 14.07.2017

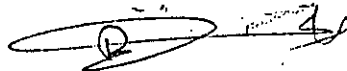
03139684669

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....2....

Copy of the above is forwarded to:-

- 1- The Minister Education School & Elementary KPK Peshawar.
- 2- The Secretary Education KPK Peshawar for information and with the request that concerned DEO(Male) may kindly be directed to take the matter on Top priority basis.



(Rahim Dad)

Drawing Master.

Annexure

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P No 478/P/2017

Rahim Dad Khan s/o Mohib gul  
R/o G.T Road Mohallah Hidayat Ullah Shah, Peshawar,  
.....Petitioner

VERSUS

- 1) Govt. of K.P.K. through Secretary Education Department, Civil Secreterate, Peshawar
- 2) The Accountant General of K.P.K
- 3) The Director of Education & Secondary Education, G.T Road, Peshawar, K.P.K
- 4) The Deputy Director Elementary & Secondary Education Khyber PukhtunKhuwa, Peshawar
- 5) District Education Officer of Education & Secondary Education, G.T Road, Peshawar, K.P.K

.....Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN 1973

Respectfully Sheweth:

1. That the petitioner did graduation (B.A) from Peshawar University beside this done (DM) Diploma from Punjab and has been inducted in Education Department against the post as in (BPS-15) on 16.04.2013 at GHS Asharban (Allai) Battagram. (Copy of the appointment letter and certificates are attached here with as annexure "A")

ATTESTED  
EXAMNER  
Peshawar High Court  
05 JUL 2017

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2. That the petitioner has served the GHS Asharban (Allai) Battagram from the day first; his performance was satisfactory. He has rendered valuable service to the best to the GHS Asharban ( Allai) Battagram, he is dutiful and no adverse remarks ever been passed by the department.
3. That, on. 06.08.2014 under the Endst No.4372-8 the petitioner has been transferred by respondent no.4 from GHS Asharban ( Allai) Battagram to Govt. Middle School Kaian District Mansehra.(Copy of the transfer order dated: 06.08.2014 is attached here as annexure "B")
4. That the petitioner obeyed the transfer order and did arrival report on.17.08.2014 to the head Master of Govt. Middle School Kaian District Mansehra.(Copy of the arrival report dated: 17.08.2014 is attached as annexure "C")
5. That afterwards the petitioner was working ceaselessly in the Govt. Middle School Kaian District Mansehra and no adverse remarks ever been passed by the department.
6. That the petitioner did received salaries under the Pers # 00718807 months, of September 2014, October 2014, November 2014, December 2014, January 2015 and February 2015 respectively.(Copies of the salaries receipts are attached as annexure "D")

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EXAMINER  
Peshawar High Court  
05 JUL 2017

FILED TODAY  
Deputy Registrar  
03 FEB 2017

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7. That February 2015 onward the petitioner didn't get a single salary form the department, even though the petitioner was giving services to the Govt. Middle School Kaian District Mansehra.
8. That astonishingly on 15.09.2015 the petitioner received a show cause notice regarding removal of service, which the petitioner did follow the proceedings. (Copy of the show cause notice is annexure "E")
9. That the petitioner didn't receive a single letter, while the petitioner salary has been stopped by the respondents, though the petitioner was serving the Govt. Middle School Kaian District Mansehra.
10. That the petitioner did submit applications to the respondent's on 09.03.2015 and on 09.11.2015 but, nobody paid any heed; which amounts to the denial of the petitioner's right, who otherwise legally fully liable to get monthly his salary like other colleagues. (Copies of the applications dated: 09.03.2015 and on 09.11.2015 are annexure "F-F1")
11. That the NAB of Khyber Pakhtunkhwa has arrested officials of District Battagram for committing embezzlement, which is reflected from the Daily Newspaper "Aaj" on 12.01.2017. (Copy of the publication dated: 12.01.2017 in Newspaper Aaj is attached as annexure "E")

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Deputy Registrar  
03 FEB 2017

FILED TODAY  
Deputy Registrar  
03 FEB 2017



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12. That the petitioner did approach the respondents with service record regarding his grievances but nobody paid any heed.
13. That the petitioner feelings aggrieved from the actions and acts of the respondents and finding no other adequate and officious remedy is constrained to file this writ petition inter alias on the following grounds.

**GROUNDS:**

- A. That the petitioner is giving his services continuously at GHS Asharban ( Allai) Battagram to Govt. Middle School Kaian District Mansehra even then the respondents illegally, unlawfully against the rules and policy have stopped the petitioner salary, which is basically the legal right of the petitioner, this is completely discrimination in the eye of law and thus the respondents have acted in violation of Article (4) of the Constitution of 1973.
- B. That the petitioner was denied his legal right of his salary, which was provided to him under the law and therefore, he was discriminated and not given his due right without any lawful reason.
- C. That the petitioner other colleagues/employees under the same circumstances are taking their salaries, while the petitioner has been denied, which offend article (25) of the constitution of Pakistan 1973.

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Deputy Registrar

03 FEB 2017

STAMPED  
03 FEB 2017

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- D. That to be treated in accordance with law and to enjoy equal protection of law is the inalienable right of every citizen, guarantee by the constitution.
- E. That though the petitioner is ceaselessly working at GHS Asharban ( Allai) Battagram to Govt. Middle School Kaian District Mansehra but even then he is not dealt fairly, justly and was ignored by the respondents for malafide reasons.
- F. That the petitioner is still on the strength of department and performing his duties, thus stoppage of salaries will definitely affect his fundamental rights to live as well as the act on the part of respondent's amount to forced labour.
- G. That the respondents have acted in a manner, which clearly amounted to the denial of the right of petitioner hence this petition.
- H. That any other relevant ground, which has not been taken in this petition please, may be allowed to agitate at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this Writ Petition the act of the respondents not accepting legal right of the petitioner salary since the month March 2015 till present i-e (December 2016) is based on malafide, without lawful authority and of no legal

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Deputy Registrar  
03 FEB 2017

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Peshawar High Court  
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effect, this Honorable Court may be pleased to declare the act of respondents not releasing salary as unlawful, void ab initio and please may direct the respondent no. 2 that to act in the matter in accordance with law to consider the petitioner genuine matter and to release his salary with arrears accordingly.

Any other relief which this Honorable Court may deem appropriate in circumstances of the case may also be granted to the petitioner.

*D.B Case*

Petitioner

Through

Dated 21/01/2017

*[Signature]*  
Advocate Ullah Khan Chamkani  
Advocate High Court, Peshawar

**CERTIFICATE:**

It is certified that no Writ Petition on the subject has been earlier filed in this Honorable Court by the petitioner.

*[Signature]*  
ADVOCATE

**LIST OF BOOKS:**

1. Constitution of Pakistan, 1973.
2. K.P.K, Civil Servants (Appointment, Promotion, and Transfer) Rules 1989.
3. Any other law books as per need.

*[Signature]*  
ADVOCATE

D. FODAR  
[Stamp]

CERTIFIED TO BE TRUE COPY

Advocate Ullah Khan Chamkani  
Peshawar High Court, Peshawar  
Autonomous Under Article 87 of  
The Constitution of Pakistan Order 1983

02 JULY 2017

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**PESHAWAR HIGH COURT, PESHAWAR**  
FORM OF ORDER SHEET

Date of Order or Proceedings	3
	2
01.06.2017	<u>WP No.478-P/2017.</u>
	<i>Present: Mr. Aamirullah Khan Chamkani, Advocate for petitioner.</i>
	****
	<u>MUHAMMAD YUNIS THAHEEM, J.-</u> Learned counsel for the petitioner submits that petitioner has removed from service and he wants to approach the proper forum for the redressal of his grievance, therefore, seeks withdrawal of the instant petition.
	In wake of the above, this petition is dismissed as withdrawn, if so, advised.
	<i>Dr. Muhammad Amirullah Khan Chamkani</i> <i>Dr. Muhammad Amirullah Khan Chamkani</i> JUDGE JUDGE
No. ....	234
Date of Presentation of Application	05/7/17
No of Pages	7
Copying fee	
Urgent Fee	
Total	28-00
Date of Preparation of Copy	05/7/17
Date Given For Delivery	05/7/17
Date of Delivery of Copy	05/7/17
Received By	

CERTIFIED TO BE TRUE COPY  
Peshawar High Court, Peshawar  
Authorized under Article 167 of  
The Constitution of Pakistan  
05/06/2017

\*Insan\*

office  
2/6/17

398A

BEFORE THE DIRECTOR ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

F/IJ

Subject: REQUEST TO RELEASE THE UNPAID ACCRUED SALARY  
AND RE-INSTATE / ADJUST THE APPELLANT IN CASE OF  
TERMINATION / REMOVAL FROM SERVICE.

With due respect Sir,

It is intimated that the appellant was enrolled on 16/4/2013 as Drawing Master at Government High School Asharban Allai District Battagram and on 6/8/2014 posted / transferred to Govt Middle School Kayan District Mansehra. The appellant being a dutiful DM worked efficiently, honestly and in a manner becoming of a civil servant and it was for this reason that no adverse remarks of action were taken against the appellant by the department concerned.

It is further intimated that the stroke of misfortune hit the appellant when his monthly salary in March 2015 was unceremoniously stopped / blocked without issuing / offering any explanation or notice to the appellant despite the fact the I was regularly serving on my post which is evident from the attendance sheet of that school. In this regard the appellant forwarded several applications to the Department and making countless visits to the office of District Education Officer District Mansehra but in vain. Latter on the appellant managed to get an un-served Show Cause Notice in which tentatively major punishment of removal of service was imposed on the appellant for the reason of absence from duty from 1/5/2015.

It is therefore, requested that my departmental appeal may kindly be considered and direction may be issued to the relevant quarters to re-start my salary and also pay me all my pending salaries since March 2015 till date. I may kindly be adjusted to my post please as I am a poor man and the only source of my income was my salary due to the stoppage of which I have been facing great problems to satisfy the needs of my family.

*Dor-EE  
Appeal is  
hereby referred*

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

*28/12/2017*

*RA*  
**Rahim Dad Khan**  
DM GMS Kayan District Mansehra  
*20/12/2017*

Present Address:

Mohallah 111 Post Ullah Shah, G.T. Road Peshawar  
Cell No. 0313-9684669

*Attested*  
*[Signature]*

*Attested*  
*[Signature]*

بخدمت جناب ڈائریکٹر ایڈمنسٹریشن اینڈ سکلڈ ڈی ایچ ایس گلبرگ

جناب عالی

1/3

مورد بالا تیار شدہ ہے کہ فردی سولہ 4/2015 کا کو بطور ڈرائیوٹ ماسٹر

(BPS-15) گورنمنٹ ہائی سکول عمریاں عالیہ بنگلہ 13 میں تعینات کیا گیا تھا۔ آخر مورخہ 8/6/2014 کو گورنمنٹ ہائی سکول کیمانی پہلے ماسٹر اور ڈرائیوٹ ماسٹر بن کر 1۔ مذکورہ سکول میں این ڈی ٹی

جانشینی سے سہرا خاتم دینے ہوئے فردی کو ماہ فروری 2015ء کی تنخواہ 10000 روپے دلی جس کی معلومات کثرت ہوئے فردی کو پہلے چلا گیا۔ اسکی تنخواہ 10000 روپے دلی کی ہوئی ہے اس بابت فردی نے شک کی ہے۔ اسکا جواب اسکی درخواستوں گزری ہوئی تنخواہ 10000 روپے دینے کی کوئی وجہ معلوم نہ ہو سکی اور نہ ہی تاحال تنخواہ 10000 روپے دلی کیسے ملے اسکی بارے میں بات ہو

فردی اپنے ڈیوٹی پر حاضر رہا اور اپنی ڈیوٹی سہرا خاتم دینا رہا۔ یہ کہ مورخہ 7/4/2015 کو ایک شوکار نوٹس بابت Removal from service پر بنا غیر حاضری موصول ہوا۔

کیونکہ فردی اپنے ملازمت سے ایک گورنمنٹ کیلئے بھی غیر حاضری نہ ہو ایسے جناب عالی فردی نے مذکورہ شوکار نوٹس کی تحریر ہی جواب دینے کے ساتھ ساتھ ڈسٹرکٹ ایجوکیشن آفیسر کے دفتر کے بے شمار حکم دیکھے ہیں۔ فردی نے کوئی تنخواہی

پہنچائی اور نہ ہی ڈسٹرکٹ ایجوکیشن آفیسر کے کوئی اڈو لٹر کی اور نہ ہی فردی کی پیشکش کیے ہوئے کوئی عرضی ملی۔ اور آخر کار مورخہ 9/2016 کو فردی کو ڈیوٹی سے منع کیا گیا جس سے دلبرداشتہ ہو کر فردی نے عدالت عالیہ پشاور میں ایک

ریٹ پٹیشن دائر کر دی جس میں عدالت عالیہ نے فردی کو متعلقہ نوام مہانہ کی حد تک کرنے اور ریٹ پٹیشن ڈسپوز آفا کر دی۔ اس راجحیت 11/11/2016

شعبہ ایڈمنسٹریشن اینڈ سکلڈ ڈی ایچ ایس گلبرگ میں فردی کی اس میں اپیل و منظور کرتے ہوئے فردی کو اپنے ملازمت پر بحال کرتے ہوئے ان تمام مہینوں (فروری 2015ء تاحال) کی تمام تنخواہیں اس میں دینے کے احکامات صادر فرمائی جاوے۔ فردی تصدیقات دعا کی رہے گی۔

ATTESTED

[Signature]

جناب عالی عین ڈائریکٹر ایچ ایس گلبرگ  
7-6-2017 (مخبرہ)

العارض

محمد داد خان ولد محمد گل ڈائریکٹ ماسٹر گورنمنٹ ہائی سکول کیمانی ضلع ماسٹرہ  
حال = جی ٹی روڈ، محلہ جہانپور اللہ شاہ آباد

Rejected

Deputy Director (G&SE) Khyber Pakhtunkhwa  
20/17

بذریعہ اطلاع: ڈسٹرکٹ ایجوکیشن آفیسر گلبرگ ماسٹرہ  
Attested  
[Signature]

محمد رفیق صاحب ڈائرینگ ایجنسی ایڈیشنل سیکرٹری ایجوکیشن، جی ڈی ایف سٹیٹ اسکول، کمانڈنگ آفیسر

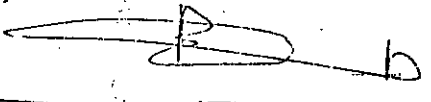
جناب عالی!

عوامی تعلیم کے فروغ کے لیے ضروری ہے کہ فوری طور پر ایڈیشنل سیکرٹری ایجوکیشن اور ڈائرینگ آفیسر کے  
مدد کوئی اور ایجنسی فراہم کرے جناب عالی فوری طور پر ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری  
تعمیر کوئی وجہ بتائیے جو تھے نکالے جانے کی بابت اس سے پہلے بھی  
میرے 2017-5-7 کو ایک حکم نامہ ایڈیشنل سیکرٹری ایجوکیشن کو بھیج دیا گیا تھا جس کا جواب  
فوری طور پر نہیں آیا۔ یہاں پر یہ معلوم نہ ہو کہ ایجنسی فراہم کی گئی ہے یا نہیں۔ ایڈیشنل سیکرٹری ایجوکیشن  
ایجوکیشن نے اس ایڈیشنل سیکرٹری ایجوکیشن کو ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے  
فوری طور پر ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے  
فوری طور پر ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے

ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے  
فوری طور پر ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے  
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ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے ایڈیشنل سیکرٹری ایجوکیشن سے

جناب عالی عین وائٹس پوری

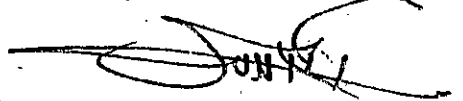
المیرہ سوم 2-2017-9-8

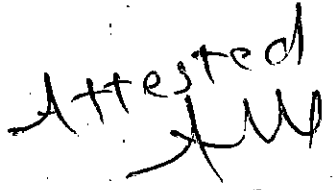


محمد رفیق صاحب ڈائرینگ ایجنسی ایڈیشنل سیکرٹری ایجوکیشن، جی ڈی ایف سٹیٹ اسکول، کمانڈنگ آفیسر  
محمد رفیق صاحب ڈائرینگ ایجنسی ایڈیشنل سیکرٹری ایجوکیشن، جی ڈی ایف سٹیٹ اسکول، کمانڈنگ آفیسر  
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ATTESTED



Attested  


محکم دلائل سے مزین و متنوع ومنفرد موضوعات پر مشتمل مفت آن لائن مکتبہ

جناب عالی! گزشتہ بیانی میں کہ فدوی نے اس سے پہلے جھٹانہ اپیل دائر کی ہوئی تھی اور اس نے بعد میں ریفرنڈم بھی دیا تھا لیکن فدوی کو ہر بار کل آجائی اور پھر سبوں آجائی کا یہ کہہ کر ٹال مٹول کیا جا رہا ہے اور فدوی کو کوئی حقیقت نہیں بتائی جا رہی ہے کہ میری نوکری اور تنخواہوں کا کیا بنا جناب عالی نہ تو فدوی کی تنخواہ بحال ہو رہی ہے اور نہ نوکری کرنے دیا جا رہا ہے اور اپیل کا بھی کوئی حقیقت نہیں بتائی جا رہی ہے۔

لہذا نہ صرف درخواست اسٹامپس سے کہ فدوی کے اپیل و حالات پر پھر پھر جان چوری کرتے ہوئے فدوی کی تنخواہ جاری کرنے اور ملازمت بحال کرنے کے احکامات صادر فرمائی جائے۔

جناب عالی حسین کوثر شاہ

مدرسہ 7/12/2012

القاری

اعلیٰ داد خان ولد محمد علی DM گورنمنٹ فوڈ سکول کمانڈیاں ماہرہ

حال ایڈریس، محلہ حیدرآباد شاہ، جی ٹی روڈ لاہور

فون نمبر 0313-9684689

Attested  
محمد

ATTESTED



(H) (40)



**BEFORE THE HONOURABLE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 13 /2018

Rahim Dad Khan S/O Mohib Gul, Drawing Master, GMS Kayan Mansehra  
R/O Muhallah Hidayat Ullah Shah, G.T Road Peshawar

Appellant  
Khyber Pakhtunkhwa Service Tribunal

Diary No. 1440

Dated 19/12/2017

**Versus**

- ✓ 1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Sahibzada Abdul Qayum Road, Civil Secretariat Peshawar
- ✓ 2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Main Grand Trunk road near Qila Bala Hisar Peshawar
- ✓ 3. District Education Officer Elementary & Secondary Education Mansehra, Kachehri Road Mansehra
4. District Audit Officer Mansehra, Kachehri Road Mansehra

Respondents

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST UNLAWFUL STOPPAGE OF SALARY SINCE MARCH 2015 TILL DATE**

The petitioner is pleased to beseech before this Honorable Court as under;

1. That the appellant is a civil servant in terms of the civil servants act 1974 and was appointed on 16/4/2013 as Drawing Master (BPS-15) at Government High School Asharban, Allai Battagram. (Copy of the appointment order dated 16/4/2013 is attached as F/A)

Filed to-day

Registrar

19/12/17

2. That on 6/8/2014, the appellant was transferred to government Middle School Kayan District Mansehra. (Copy of Transfer Order dated 6/8/2014 is attached as F/B)

Re-submitted to-day and filed.

Registrar

3/1/18

ATTESTED

Khyber Pakhtunkhwa Service Tribunal Peshawar

That upon receipt of transfer order, the appellant submitted his Charge relinquish report on 7/8/2014 and reported to GMS Kaian, Mansehra. (Copy of the Charge Relinquish Chit dated 7/8/2014 is attached as F/C)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.**

**Service Appeal No. 13/2018**

Date of Institution ... 19.12.2017

Date of Decision ... 13.01.2021



Rahim Dad Khan S/O Mohib Gul, Drawing Master, GMS Kayan Mansehra.

R/O Muhallah Hidayat Ullah Shah, G.T Road Peshawar.

... (Appellant)

**VERSUS**

Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Sahibzada Abdul Qayum Road, Civil Secretariat, Peshawar and three others.

... (Respondents)

Mr. MIAN MUHAMMAD IMRAN,  
Advocate

For appellant.

MR. KABIRULLA KHATTAK,  
Additional Advocate General

For respondents.

MUHAMMAD JAMAL KHAN  
MIAN MUHAMMAD  
ATIQU-UR-REHMAN WAZIR

MEMBER (Judicial)  
MEMBER (Executive)  
MEMBER (Executive)

**JUDGEMENT:**

**MUHAMMAD JAMAL KHAN, MEMBER:-** Through the instant Service appeal submitted under Section-4 of the Khyber Pakhtunkhwa Services Tribunal Act, 1974, the order of stoppage of salary since March 2015 till date has been called in question.

2. According to the appellant being civil servant, he was inducted into service on 16.04.2013 as Drawing Master (BPS-15) at Government High School Asharband, Allai District Battagram. Appellant was transferred from the aforesaid school to Kayan, District Mansehra, on 06.08.2014, in consequence thereof he submitted his charge

**ATTESTED**


**MEMBER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

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relinquishment report on 07.08.2014 and as such reported to GMS Kayan. He rendered his duties efficiently and honestly in a manner becoming of a civil servant and for this reason no adverse remarks were recorded or action was taken, during the course of rendition of services at GMS Kayan he received regular salaries till February 2015 whereafter his salaries were unceremoniously stopped/blocked without tendering any explanation or notice to appellant. It was during this period that he made strenuous efforts to unblock his salaries or to ascertain the reason for its stoppage but did not succeed. After putting in immense efforts he was able to get an un-served show-cause notice in which he has been tentatively imposed major penalty of removal from service for the reason of absence from duty. No statement of allegations was served on appellant nor any inquiry was conducted nor allegiance to the provision of Rule 5, 7 & 9 of Government of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules was made nor he has been handed over any manuscript as to the status of employment of appellant eliciting mala-fide on the part of respondents thus violating the Fundamental Rights of appellant, he made recourse to the Hon'ble Peshawar High Court, Peshawar, through Writ Petition No. 478-P/2017 which was ultimately withdrawn with the direction to make recourse to the proper forum. He made efforts to procure the copies of the relevant documents from the office of District Education Officer concerned through the good offices of RTI but no response was received by him vide his application dated 14.07.2017. The departmental appeal dated 29.06.2017 moved for the purpose proved unsuccessful vide order dated 07.12.2017 followed by the instant service appeal.

3. It is worth to be mentioned that earlier the Hon'ble Members of this Tribunal in their respective judgments differed essentially on the point as to the legal status of appellant one Member declared him as Civil Servant while the other subjected his opinion in this regard to the outcome of the inquiry to be conducted against appellant although both of them respectively concurred on the point of holding of inquiry in the matter thus due to this tie the appeal was referred to the Larger Bench for adjudication.

4. Respondents were summoned in response thereof they attended the Tribunal through their legally authorized representative, vehemently

ATTESTED  
  
 EXAMINER  
 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar

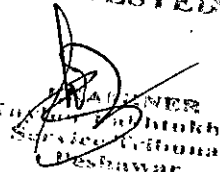
controverting the claim of appellant by submitting comments/reply wherein certain legal and factual objections were raised, inter-alia, that appellant is not aggrieved person, appellant is estopped by his own conduct, appellant has not come to this Tribunal with clean hand, appellant has no cause of action/locus standi, appeal is against the prevalence law and rules and appellant has concealed the material facts etc.

5. We have heard arguments of the learned counsel representing appellant as well as learned Additional Advocate General representing respondents and were able to go through the record with their assistance.....

6. While initiating arguments the learned counsel representing appellant submitted that the moot question for resolution before this bench relates to the release of salary of appellant. While making reference to the split judgment passed earlier by the Hon'ble Members of this Tribunal he submitted that there was complete unanimity regarding conducting of inquiry for ascertainment of the facts. The point at which the worthy Members were at variance was with regard to fact that as to whether appellant is a civil servant or else otherwise. The learned counsel submitted that in case appellant was not a civil servant in that eventuality this Tribunal was divested of jurisdiction and this Tribunal would have returned the very appeal at the very outset. The learned counsel declared that appellant is a civil servant and he has to be dealt with in accordance with the Khyber Pakhtunkhwa Government Servants Efficiency & Discipline) Rules, 2011.

7. On the contrary, the learned Additional Advocate General submitted that there is no order either original or appellate before this Tribunal for adjudication. He referred to the Writ Petition filed in the Hon'ble Peshawar High Court which was withdrawn on 01.06.2017 wherein the learned counsel representing appellant submitted that appellant has been removed from service and he want to approach proper forum, appellant has concealed material facts from this Tribunal. He further contended that no order regarding the release of salary of appellant has been passed which fact was not entertained by the Tribunal rather dismissed the very plea in the judgements pronounced, the appointment of appellant is fake and fabricated the case of

ATTESTED

  
 ATTENDING OFFICER  
 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar

(44)

appellant cannot be reckoned to be included in the category of civil servant. He has been removed from service rightly. The appointing authority has not been made party hence, the appeal is bad due to non-joinder of necessary party.

8. The perusal of record would reveal that while conducting post audit process certain irregularities were noticed in the payment of salary made to the appellant upon which his salary was stopped. For ascertainment of the facts the District Education Office (Male) Mansehra, dispatched a letter regarding the veracity of appointment order of appellant to District Education Officer (Male) Battagram, who reportedly was the authority vide letter bearing no. 6851 dated 19.04.2018. In response thereof the District Education Office (Male) Battagram, by virtue of letter dated 03.09.2018 submitted that appellant has not been appointed by his office nor he performed duty at GHS Asharband and it was concluded that the appointment order of appellant was fake and fabricated. Accordingly, his salary was stopped with effect from March 2015, it is worth to be mentioned that appellant did receive his salaries till February 2015 regularly however, he was proceeded against on account of absence from duty. The record on file nowhere mentions that appellant has been proceeded in accordance with the cannon of rules as visualized by the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, nor the matter has been inquired to ascertain as to how the appointment of the appellant was made to the post of Drawing Master (BPS-15) and how he managed to be transferred from the District Cadre post which he held at District Battagram to District Mansehra, how he received salary at the last mentioned place of posting? Appellant claimed to be a civil servant if this plea of appellant is taken into consideration it was incumbent upon the authority at the helm of affairs to have properly initiated departmental proceedings as mandated by the law and as such initiating the same by issuance of show-cause notice alongwith statement of allegations followed by conducting of regular inquiry so that the grain should have been sifted from the chafe. Whatever may be the allegations against the appellant conformity with the rules and following the law in this regard was the only course open for the authorities to have been adopted before initiation of proceedings or making any order adversely affecting his case. The authenticity and

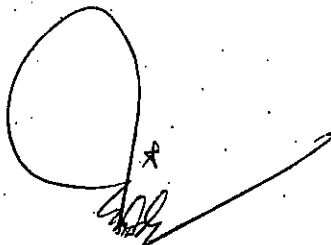
(45)

credulity of appointment order could have been established only when full-fledged inquiry in the matter was made as regard the position held by the appellant it has to be ascertained vis-à-vis his appointment order. If it is established that he held the post by a valid appointment order an order with regard to release of salary could be made and the case would be otherwise if the appointment order is invalidated.

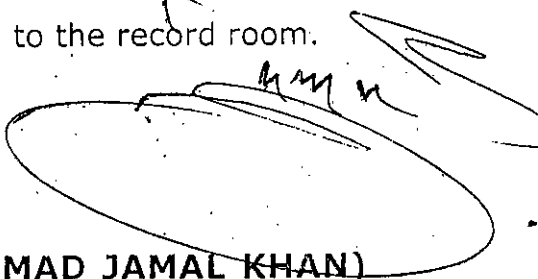
9. There could be no second opinion as regard the factum that when no final order is challenged before this Services Tribunal as enunciated by the Hon'ble Supreme Court of Pakistan in its judgement reported as 2006 SCMR 1630 and the unreported judgement of this Tribunal in Service Appeal No. 19/2011 Captioned Mr. Abdul Waheed SET Versus Executive District Officer E&SE Education Department decided on 15.12.2017 however, at the moment the question for determination is the establishment of the veracity and genuineness of appointment order of appellant, the resolution of which is not possible unless and until it is ascertained through a regular inquiry.

10. Resultantly, the appeal is remitted back to the respondents for conducting of regular inquiry in the process of which the appellant has to be associated by providing him fair opportunity of defending himself within a period of 90 days from the date of receipt of copy of this judgement. Keeping in view the circumstances of the instant case no order or reinstatement or release of pay could be passed at this stage which of course would be subject to outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

**ANNOUNCED**  
**13.01.2021**



**(MIAN MUHAMMAD)**  
**Member (Executive)**

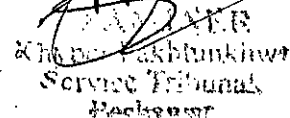


**(MUHAMMAD JAMAL KHAN)**  
**Member (Judicial)**



**(ATIQ-UR-REHMAN WAZIR)**  
**MEMBER (Executive)**

Certified to be true copy



Services Tribunal  
Pakistan

میرا ریمداد مہلوں دار عجب نکل اس وقت کا انورا دور  
 یوں کہ میرا آرڈر ڈی۔ او۔ (D.O) منظر کے دفتر سے  
 ہوا اور میں نے گورنمنٹ ہائی سکول - حاشیہ میں الائیڈنگ  
 میں فرائض انجام دیئے اور شہوان بھی لی ہے۔ اور اس وقت  
 بعد میری فرائض سفر منظر سے گورنمنٹ ہائی سکول کے  
 کاتبان مال پارہ میں ہوئی۔ اور وہاں میں نے کاتبان  
 کاہنڈی ڈیوٹی کی ہے اور سیکری ضروری کااج میں  
 لکھی ہے۔ میرا آرڈر فوائض پرمینی ہے۔ اور میں  
 آج پشاور سے عمان آکر ہوا۔ اور اس وقت میں  
 پیش ہوا۔ اور میں اس بات کو ملحوظ خاطر کرنا  
 چاہتا ہوں کہ کسی کو یہ دینے میں  
 اور ایک بعد میں نے عدالت سے رجوع کیا۔ اور  
 عدالت نے میرے حق میں فیصلہ دیا ہے۔  
 میرے تھوڑے تھوڑے سے ہوا

میں رحیم داد ولد محبت گل اس بات کا اقرار کرتا ہوں کہ میرا آرڈر ڈی او (DO) بنگرام کے دفتر سے ہوا اور میں نے گورنمنٹ ہائی سکول حاشر بن الائی بنگرام میں فرائض انجام دیئے اور تنخواہ بھی لی ہے اور اسکے بعد میری ٹرانسفر بنگرام سے گورنمنٹ مڈل سکول کانیاں مانسہرہ میں ہوئی اور وہاں میں نے مارچ 2015 تک ڈیوٹی کی ہے اور سیلری فروری 2015 تک لی ہے میرا آرڈر حقائق پر مبنی ہے اور میں آج پشاور سے مانسہرہ آ کر انکوائری کمیٹی کے سامنے پیش ہوا اور میں اس بات کی حلفاً اقرار کرتا ہوں کہ میں نے نہ کسی کو پیسے دیئے ہیں۔ اور نہ اسکے بعد میں نے عدالت سے رجوع کیا اور عدالت

نے میرے حق میں فیصلہ دیا ہے۔

میرے چھوٹے چھوٹے بچے ہیں۔



(J)

(48)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Execution Petition No. 104 /2021

IN

Service Appeal No. 13/2017



Rahimdad S/O MuhiB Gul (Drawing Master), GMS Kayan Mansehra R/O Mohallah  
Hidayatullah Shah, GT Road Peshawar

...Petitioner

VS

1. Secretary Elementary & Secondary Education, Government of Khyber Pakhtunkhwa Civil Secretariat Peshawar
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, GT Road Peshawar
3. District Education Officer (M), Kachehri Road, District Mansehra
4. District Audit Officer, Kachehri Road, District Mansehra

...Respondents

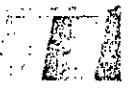
EXECUTION PETITION IN RESPECT OF THE JUDGMENT RENDERED BY THE  
WORTHY LARGER BENCH OF THIS HONORABLE TRIBUNAL VIDE DATED:  
13/01/2021 IN THE ABOVE SERVICE APPEAL WHEREBY THE RESPONDENTS WERE  
DIRECTED TO CONDUCT INQUIRY WITHIN A PERIOD OF 90 DAYS BUT THE  
RESPONDENTS REMAINED FAILED TO CONCLUDE THE SAID INQUIRY  
PROCEEDINGS IN THE SPECIFIED PERIOD WHICH ENTITLES THE PETITIONER TO  
BE RE-INSTATED WITH ALL BACK BENEFITS ON THE POST OF DRAWING MASTER  
(DM) IN THE EDUCATION DEPARTMENT

The petitioner is pleased to beseech before this Honorable Court as under;

1. That the petitioner filed Service Appeal No. 13/2017 before this Honorable Service Tribunal which was decided by the Worthy Larger Bench of this Honorable Tribunal vide Judgment Dated: 13/01/2021. (Copy of the Service Appeal and Judgment Dated: 13/01/2021 is attached as F/A)

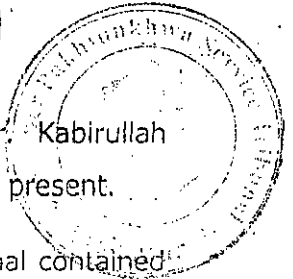
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Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

M. A. H. Khan



E.P. No. 104/2021  
Rahim Dad VS Govt

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13.10.2021

Petitioner alongwith his counsel present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

In pursuance of the directions of Service Tribunal contained in its judgement dated 13.01.2021 in service appeal No. 13/2018 titled Rahim Dad Khan S/o Mohib Gul, Ex-Drawing Master, GMS Kayan Mansehra, a proper regular enquiry was conducted and based thereon notification dated 03.09.2021 was issued "awarding him the major penalty of dismissal from service".

Learned counsel for the Petitioner did not agree with the final order passed as a result of de-novo enquiry and raised objection particularly with regard to conducting the said proceedings after the lapse of ninety days period given by the Service Tribunal in its Larger Bench judgement. It was contended that the specific time given by the court has to be complied with, in letter and spirit. In support of his arguments he relied and made reference to 2017 PLC (CS) Note 20, 2020 PLC (CS) 918 and 2010 PLC(CS)608. To counter arguments of the learned counsel for the petitioner, learned AAG relied on case law, to be produced, according to which when final order was passed pursuant to the judgement of Larger Bench dated 13.01.2021, then the Execution Petition in hand stands infructuous. To come up for further proceedings before the S.B on 09.12.2021.

*[Handwritten signature]*

(MIAN MUHAMMAD)  
MEMBER (E)

Date of Presentation of Application 30/11/21  
Number of Words 800  
Copying Fee 10/-  
Urgent 10/-  
Total 20/-  
Date of Delivery of Copy 07/12/21  
Date of Delivery of Copy 07/12/21

Certified to be true copy

*[Handwritten signature]*  
KABIRULLAH KHATTAK  
Service Tribunal,  
Peshawar

AAC ✓


**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)**  
**DISTRICT MANSEHRA**

K 50

**NOTIFICATION:-**

WHEREAS Mr. Raheem Dad DM (B-15) GMS Kayyan District Mansehra was proceeded under Khyber Pakhtunkhawa Government Servant (Efficiency & Discipline) Rules 2011 on account of bogus and fake appointment.

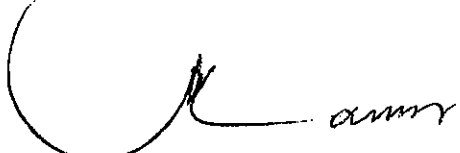
- 1) AND WHEREAS you inducted yourself into the Government Service fraudulently through appointment order vide Endst: No8178-83 dated: 11-03-2013 which was fake and fabricated, whereas the appointment order of only five candidates as a Drawing Master were issued by the DEO(M) Battagram, in original appointment Order and your name was not there in the original appointment order.
- 2) AND WHEREAS on basis of fake & Fabricated appointment order you were allegedly transferred from GHS Arshban District Battagram to GMS Kayyan District Mansehra through inter district transfer Vide Endst: 372-8 dated: 06-08-2014, whereupon after transfer the relieving chit and the last LPC Certificate could not be verified from the concerned authority.
- 3) AND WHEREAS appeal No. 13/2018 was filed by you before the KP service Tribunal Peshawar, which was decided vide judgement dated 13/01/2021.
- 4) AND WHEREAS the denovo inquiry was initiated in the light of the decision of KP Service Tribunal Peshawar. So the inquiry committee was constituted vide this office letter No. 1197 dated 04/02/2021 but committee refused to inquire the matter, whereas another committee was constituted vide this office letter No. 1760-61 dated 20/01/2021 to inquire the matter, whereas due to Covid-19 pandemic schools were closed and administrative offices were also placed on work from home strategy as per direction of NCOC.
- 5) AND WHEREAS inquiry committee submitted its report dated 19/04/2012 vide diary No. 2507, wherein the opportunity of hearing and fair chance of self defence as well as cross examination was provided to you.
- 6) AND WHEREAS the Showcause notice was served upon you vide this office Endst No. 6919 dated 01/07/2012, wherein major penalty of rule 4 sub rule 1 (b) was tentatively imposed upon you. Whereas you did not submit the reply of showcase notice within stipulated period hence placed *Ex-Parte* and you were summoned for personal hearing on 25/08/2021 vide this office letter No. 9172 in your mailing address and you did not appear for personal hearing on scheduled date and failed to defend the charges leveled against you, hence proceeded *Ex-Parte*.
- 7) AND WHEREAS you were called for personal hearing on 25/08/2021 vide this office letter No. 9172 dated 17/08/2021 and you failed to attend the office of undersigned for personal hearing in stipulated time and failed to avail the opportunity of self defence.
- 8) NOW THEREFORE the competent authority in exercise of the power conferred upon him under rule 4 sub rule 1 (b) (iv) of the Khyber Pakhtunkhawa Government servants (Efficiency & Discipline) rules 2011, is pleased to impose the major penalty of "**DISMISSAL FROM SERVICE**" upon Mr. Raheem Dad DM GMS Kayyan Mansehra with immediate effect.

  
(MUHAMMAD TANVEER)  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst: No. 10289-95Date at Mansehra the 03 / 09 / 2021

Copy forwarded for information to:

1. The Honourable Registrar service Tribunal Khyber Pakhtunkhawa Peshawar vide his judgement dated 13/01/2021 in service Appeal No. 13/2018.
2. The Secretary to Govt. of Khyber Pakhtunkhwa E&S Department Peshawar.
3. The Director Anti-Corruption Establishment Peshawar with the request to initiate the legal action against the accused i.e FIR as per relevant law with regard to the fake and bogus appointment.
4. The Director E&S Khyber Pakhtunkhwa Peshawar.
5. The Deputy Commissioner Mansehra.
6. The District Account Officer Mansehra.
7. The District Monitoring Officer Mansehra.
8. The Headmaster GMS kayan District Mansehra.
9. Office file.

  
(MUHAMMAD TANVEER)  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

To

The Worthy Director,  
Elementary and Secondary Education Department,  
Government of Khyber Pakhtunkhwa,  
Peshawar

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 03/09/2021  
WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE BASED ON EX-  
PARTE PROCEEDINGS DESPITE THE FACT THAT THE APPELLANT APPEARED  
BEFORE THE INQUIRY COMMITTEE ON 26/02/2021 AND RECORDED HIS  
STATEMENT IN CONJUNCTION WITH THE FACT THAT APPELLANT HAS BEEN A  
BONA FIDE EMPLOYEE OF THE EDUCATION DEPARTMENT SERVING AS DRAWING  
MASTER BPS-15 IN DISTRICT MANSEHRA

The appellant submits as under;

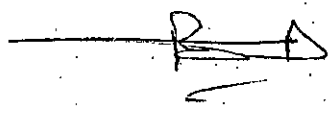
1. That the appellant was appointed on the post of drawing master BPS-15 in District Battagram vide Order Dated: 16/04/2013 against a vacant post among other appointees and a service book regarding service was lawfully issued with all the required entries which was endorsed by the competent authority.
2. That after performing his duties in "GHS Asharban, District Battagram" for about one year, the appellant was transferred to "GMS Kayyan, District Mansehra" vide Order Dated: 06/08/2014, properly issued by the Directorate of Elementary and Secondary Education and started performing his duties with zeal and zest.
3. That after serving for several months in "GMS Kayyan District Mansehra", the appellant was issued an unserved Show-Cause Notice regarding his absence from duty vide Order Dated: 15/09/2015 whereby it was proposed that major penalty of removal from service might be imposed in case of no reply. Even the appellant has also drawn salaries from both the schools and also had entire service record.
4. That it is also indispensable to submit that the appellant's salary was unceremoniously stopped from the month of March 2015 which compelled him to file a Writ Petition bearing No. 478-P/2017 which was in fact withdrawn due to the wrong forum. It is also added that the appellant filed a number of applications for the release of his salary but remained heedless.

(Consisting of  
03 pages)

1546  
10-11-21

52

5. That feeling aggrieved, a proper departmental appeal was also filed which was rejected by your good office followed by Service Appeal No. 13/2018 was instituted in the worthy KP Service Tribunal.
6. That it is indispensable to submit that the Service Appeal No. 13/2018 was decided by the Honorable larger bench on 13/01/2021 wherein the appeal was remitted back to the department for conducting regular inquiry within a time period of 90 day and also to associate the appellant in the inquiry proceedings.
7. That it is of the utmost importance to mention here that the appellant appeared before the inquiry committee on 26/02/2021 and also recorded his statement before the inquiry committee consisted of "Mr. Sajjad & Mr. Rashid".
8. That it is further necessary is to submit that the department remained failed to complete the inquiry within the specified period of 90 days. Further added that the department conducted another inquiry in which the impugned order was passed based on ex-parte proceedings against the appellant which culminated on the dismissal from service vide order dated 03/09/2021.
9. That the impugned order was in fact, received by the appellant during the execution proceedings before the Worthy Service Tribunal on 13/10/2021, hence, the instant departmental appeal properly within time.
10. That it is also intrinsic to submit that the department has taken false and fabricated stance before the tribunal by stating and concealing the facet of conduction of inquiry by the concern committee and ex-parte decision was passed which is altogether illegal and unlawful, which needs to be set-aside.
11. That even a number of applications have been submitted by the appellant to the concerned DEO via RTI to provide the outcome of the inquiry conducted by the committee but remained heedless.
12. That to conduct inquiry is a delicate and complex phenomenon wherein each and every facet is required to be kept in mind by the inquiry committee. In



3 53

the case in hand, no show-cause, statement of allegation and charge sheet has been given which has made all the inquiry proceedings a question mark.

13. That the appointment of the appellant has rightly been made by the competent authority followed by his transfer to the "District Mansehra" which has rightly been issued by the competent authority as well.

14. That the impugned dismissal notification/order is against the mandate of law and rules and has badly affected the fundamental rights of the appellant.

It is, therefore, most humbly requested that on acceptance of this departmental appeal, the impugned Order Dated: 03/09/2021 whereby the appellant has been dismissed from service may kindly be set-aside and the appellant may kindly be reinstated on the post of Drawing Master (DM BPS-15) with all back benefits. Any other order which is also detrimental to the service record of the appellant may also be set-aside please.

Dated 10/11/2021

Appellant



(Rahim Dad)

Drawing Master (DM)  
(BPS-15)  
GMS Kayan  
District Masehra



**M&P Express Logistics (Pvt) Ltd.**

M 54

Accounts Copy

Shipment Information		Client Information		Price Information	
Tracking # 391000169749		To: EDO	Address: DISTRICT EDUCATION OFFICER MANSEHRA Contact: 0997382271	Pieces: 1	Charging Weight: 0.5 Dimension: 0 X 0 X 0
Ref No:		From: RAHIM DAD KHAN		Val. Declared:	
Service: Flyer		Address: OFFICE NO 5 SHAN PALAZA SIKANDAR PURA HASHNAGRI PESHAAWAR	Insurance:		
Origin: PESHAWAR		Contact: 03339577770	Amount: 243.48 Discount: N/A GST: 36.52		
DST: MANSEHRA		Supplymentary:	Net Amount: 280 Description: ON SHIPPER RISK		
Booking Date: 14 Jun 2021 13:57:32:587	Special Instructions:	Package Contents: DOC			
User: muhammad.umar_rse@mulphilog.com					
NTN No: 0860540-8					
Signature:					

Note: Please refer to our website for terms and conditions.

(55)

The Worthy District Education Officer,  
District Manshera

Subject: Provision of the below mentioned  
information/documents under RTI Act

Respected Sir, With profound veneration, it is submitted  
that the undersigned requires the  
following detail/documents under "Right to  
Information Act";

(i) Inquiry proceedings conducted &  
Carried out in "Rahimdad, DM"  
issue as per direction of Worthy  
senior tribunal judgment Dated: 13/1/2021

(ii) All statements recorded during  
the inquiry proceedings.

(iii) Recommendation & findings

(iv) Statement of allegation

(v) Show-Cause

(vi) Letter to the undersigned to appear  
in the inquiry proceedings.

(The inquiry Committee Consisted of)  
Mr. Rashid & Mr. Sajjad

(P70) (Pg #2)

Dating #  
of RTI  
2839

14/6/2021



(2)

(56)

~~15A~~

It is therefore, most humbly requested that the mentioned information/documents may kindly be provided to the undersigned as soon as possible please.

→ 14/6/2021

(Rahim dad Khan)

Drawing Master  
District Manshera  
Education Department  
Fyzes Peshawar

→ Address: Office #05, Shaw Plaza  
Sikandarpora, Hashtnagri  
Peshawar c/o Mian  
Muhammad Imran  
High Court Peshawar

Cell # 0313 9684669  
0333 9577770

Copy forwarded to;

(i) Chief Commissioner, Right to  
Information Commission, Peshawar  
K-P

14/6/2021

(57)

KP-RTI COMMISSION
Diary No: 3475
Date: 12.07.2021
Section: _____

The Chief Information Commissioner,  
K.P. Information Commission

Subject: Complaint for non provision of information

Dear Sir,

With the reference to my report submitted for DEO, Male, Mandya, but despite of stipulated time, no info is still received.

So please direct the concerned authority, to provide me the requested info.

Sincerely yours

Rahim Dad Khan  
Address: Office no 5, Shan /  
Sikandar pur, Hasthageri

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History # 3472  
12-07-2021

KP INFORMATION COMMISSION  
Near SRT Abdera Station, Behind Jabar Flats,  
Arbab Colony, University Road, Peshawar  
Email: [Complaints.kprti@kp.gov.pk](mailto:Complaints.kprti@kp.gov.pk)  
Ph: 92-91-9216557  
Fax: 92-91-9216561

(59)

REMINDER

No. KPIC/AR/1-8084/2021  
Dated:

12.4 AUG 2021

The District Education Officer (Male)/PIO,  
Mansehra.

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION  
(COMPLAINT NO: 08084)**

I am directed to refer the Office letter No. RTIC/AR/1-8084/2021/9214-16 dated 04<sup>th</sup> August, 2021, and to state that the reply is still awaited.

It is to direct that the necessary compliance is required within five days positively of the receipt of this letter under intimation to this Commission.

Assistant Registrar  
KP Information Commission  
KPK, Peshawar.

Copy to:-

1. PS to Chief Information Commissioner, KPIC, Peshawar
2. Mr. Rahim Dad Khan (Complainant)

Assistant Registrar  
KP Information Commission  
KPK, Peshawar.

(60)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION COMMISSION  
Near BRT Abdara Station, Arbab Colony, Opposite Jabar  
Flats, University Road, Peshawar.  
Email: [complaints.kprti@kp.gov.pk](mailto:complaints.kprti@kp.gov.pk)  
Phone: 091-9216557  
Fax: 091-9216561

No: RTIC/AR/1-8084/2021

Dated: 07.4 AUG 2021

To

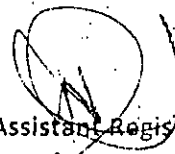
The District Education Officer (Male)/PIO,  
Mansehra.

Subject:  
Memo:

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO: 08084)**

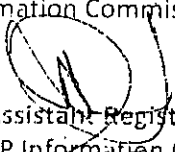
I am directed to state that a citizen Mr. Rahim Dad Khan has filed an information request with your Office for seeking some information, however the same was not provided to him within prescribed time limit, therefore, he has filed a complaint before the KP Information Commission. (copy attached)

2. It is to direct to respond under section 10 of the KP RFI Act, 2013 to the complainant within ten working days of the receipt of this letter under intimation to KP Information Commission.

  
Assistant Registrar,  
KP Information Commission,  
Peshawar.

Copy to:-

1. PS to Chief Information Commissioner, KP Information Commission, Peshawar.
2. Mr. Rahim Dad Khan (Complainant)

  
Assistant Registrar,  
KP Information Commission,  
Peshawar.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
RIGHT TO INFORMATION COMMISSION  
Near AbdaraBRT stop, behind jabar flats, Arbab colony  
Univesity Road, Peshawar  
Email: [ps.cic.kprti@kp.gov.pk](mailto:ps.cic.kprti@kp.gov.pk)  
Ph: 92-91-9216556  
Fax: +92-91-9216561

61

No: KPIC/AR/1-8084/2021  
Dated:

21 SEP 2021

18635  
38

**FINAL NOTICE**

To

The District Education Officer (Male)/PIO,  
Manshra.

Subject:

**FINAL NOTICE FOR NON SUPPLY OF INFORMATION TO MR. RAHIM  
DAD KHAN (COMPLAINT NO.08084).**

I am directed to refer to the subject noted above and to state that a complaint has been filed by the requester/complainant regarding non-supply of information. In this regard necessary direction vide letter No. KPIC/AR/1-8084/2021/9859-61, dated: 24<sup>th</sup> August, 2021 has been issued to you, the response whereof is still awaited.

I am further directed to convey that the Commission has expressed concern over the violation of time lines fixed under Section 11 read with Section 23 of the KP RTI Act, 2013, and non-compliance of lawful directions of the Commission given under Section 25 read with Section 26 of the act ibid, forwarded through letters referred to above.

In view of the above, the Officer (s) responsible have rendered themselves liable to be proceeded against under Section 26 read with Section 28 of the Act ibid, the Commission however, has decided that before invoking punitive provisions, a final opportunity be extended to the public body to respond and provide the requested information to the complainant within seven working days after the receipt of this notice under intimation to this Commission.

Assistant Registrar  
KP Information Commission  
Peshawar.

Copy to:-

1. PS to Chief Information Commissioner, KP Information Commission Peshawar.
2. Director, Directorate of Elementary & Secondary Education, Peshawar
3. Mr. Rahim Dad Khan (Complainant)

Assistant Registrar  
KP Information Commission  
Peshawar.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION COMMISSION  
Near BRT Abdara Station, Arbab Colony, Opposite Jabar  
Flats, University Road, Peshawar.  
Email: [complaints.kprti@kp.gov.pk](mailto:complaints.kprti@kp.gov.pk)  
Phone: 091-9216557  
Fax: 091-9216561

62

No: RTIC/AR/1-8084/2021

Dated:

12958-01  
10 9 NOV 2021

To

Mr. Rahim Dad Khan,  
Office No. 5, Shan Plaza, Sikandar Pura, Hashtangri,  
Peshawar.

Subject: **COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO: 08084)**  
Memo:

I am directed to refer to the subject noted above and to enclose herewith the information received from District Education Officer (Male), Nowshera vide No. **11068** dated: **28-90-2021**.

With these remarks your case stands disposed of.

Assistant Registrar,  
KP Information Commission,  
Peshawar.

Copy to:-

1. PS to Chief Information Commissioner, KP Information Commission, Peshawar.
2. PA to Commissioner-II, KP Information Commission, Peshawar.
3. District Education Officer (Male), Manshera

Assistant Registrar,  
KP Information Commission,  
Peshawar.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT MANSEHRA

Phone # 0997-302271 Fax # 0997-302270  
E-mail Address: dloedu\_manshra@yahoo.com  
Facebook Page: www.facebook.com/DIOEMMANSEHRA

No. 11062 /

Date 28/09/2021

To,

The Assistant Registrar,  
Right to Information Commission,  
Khyber Pakhtunkhwa Peshawar

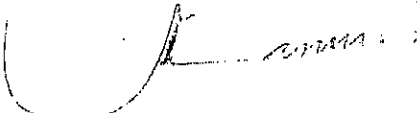
KP-RTI COMMISSION
Diary No: <u>5/10/2021</u>
Date: <u>21-10-2021</u>
Section: <u>5/10</u>

Subject: FINAL NOTICE FOR NON SUPPLY OF INFORMATION TO MR. RAHIM DAD KHAN (COMPLAINT NO. 08084)

Memo:

Reference your good Office letter No. KPIC/AR/1-8084/2021 Dated 21-09-2021 on the subject cited above.

The requisite information/documents in r/o Mr. Rahim Dad Khan E-DM copy of inquiry report, Show cause Notice, letter for personal hearing & Dismissal from Service order are enclosed herewith for further necessary action/process please.

  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA



(64)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA

Mr. Rahim Dad DM (B-15) GMS Kayyan District Mansehra was proceeded under Khyber Pakhtunkhwa Government Service (Efficiency & Discipline) Rules 2011 on account of bogus and fake appointment.

WHEREAS you inducted yourself into the Government Service fraudulently through appointment order vide Endst No. 1173-63 dated: 11-03-2013 which was fake and fabricated, whereas the appointment order of only five posts as a Drawing Master were issued by the D.E.O(M) Battagram, in original appointment Order and your name was not there in the original appointment order.

WHEREAS on basis of fake & Fabricated appointment order you were allegedly transferred from GMS Battagram District Battagram to GMS Kayyan District Mansehra through inter district transfer Vide Endst No. 1173-63 dated: 25-08-2014, whereupon after transfer the relieving chit and the last LPC Certificate could not be verified from the concerned authority.

WHEREAS appeal No. 13/2018 was filed by you before the KP service Tribunal Peshawar, which was decided by the judgement dated 13/01/2021.


WHEREAS the denovo inquiry was initiated in the light of the decision of KP Service Tribunal Peshawar. So an inquiry committee was constituted vide this office letter No. 1197 dated 04/02/2021 but committee refused to inquire the matter, whereas another committee was constituted vide this office letter No. 1760-61 dated 20/02/2021 to inquire the matter, whereas due to Covid-19 pandemic schools were closed and administrative offices were also placed on work from home strategy as per direction of NCOG.

AND WHEREAS inquiry committee submitted its report dated 19/04/2021 vide dly No. 2507, which in the absence of opportunity of hearing and fair chance of self defence as well as cross examination was provided to you.

AND WHEREAS the Showcause notice was served upon you vide this office Endst No. 6910 dated 04/07/2021. Wherein major penalty of rule 4 sub rule 1 (b) was tentatively imposed upon you. Whereas you did not submit the reply of showcase notice within stipulated period hence placed *Ex-Parte* and you were summoned for personal hearing on 25/08/2021 vide this office letter No. 9172 on your mailing address and you did not appeared for personal hearing on scheduled date and failed to defence the charges leveled against you, hence proceeded *Ex-Parte*.

7) AND WHEREAS you were called for personal hearing on 25/08/2021 vide this office letter No. 9172 and on 17/08/2021 and you failed to attend the office of undersigned for personal hearing in stipulated time and failed to avail the opportunity of self defence.

8) NOW THEREFORE the competent authority in exercise of the power conferred upon him under rule 4 sub rule 1 (b) (iv) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) rules 2011, is pleased to impose the major penalty of "DISMISSAL FROM SERVICE" upon Mr. Rahim Dad DM GMS Kayyan Mansehra with immediate effect.

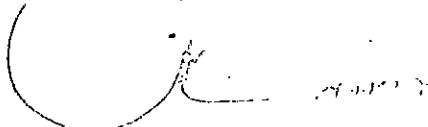
  
(MUHAMMAD TANVEER)  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst No. 10289-95

Date: Mansehra the 23 / 09 / 2021

Copy forwarded for information to:

1. The Honourable Registrar service Tribunal Khyber Pakhtunkhwa Peshawar vide his judgement dated 13/01/2021 in service Appeal No. 13/2018.
2. The Secretary to Govt. of Khyber Pakhtunkhwa Education Department Peshawar.
3. The Director Anti-Corruption Establishment Peshawar with the request to initiate the legal action against the undersigned in connection with the fake and bogus appointment.
4. The Director E&SE Khyber Pakhtunkhwa Peshawar.
5. The Deputy Commissioner Mansehra.
6. The District Account Officer Mansehra.
7. The District Monitoring Officer Mansehra.
8. The Headmaster GMS kayan District Mansehra.
9. Office file.

  
(MUHAMMAD TANVEER)  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

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**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)**  
**DISTRICT MANSEHRA**

Phone # 0997-302271 Fax # 0997-302244  
E-mail Address: edgedu\_mansehra@yahoo.com  
Facebook Page: www.facebook.com/DEOMMANSEHRA

No. 9172 /litigation branch/

Date 16-8-2021

The Rahim Dad  
Office#05 Shan Plaza Skindar Para Hashitnagri  
Peshawar C/O Mian Muhammad Inam High Court  
Peshawar  
(Cell # 03139684669 / 0333957770)

Subject: PERSONAL HEARING

Memo:

It is to inform you that competent authority has directed you that, you may be attend the office of undersigned on 25/08/2021 regarding your **personal hearing** before the competent authority.

You are hereby directed to attend this office on aforementioned date, otherwise ex-parte proceeding shall be initiated against you under E&D rules 2011.

  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

66

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA


No. 6919

Date 01/10/2021

Rahim Dad Khan (Ex-DM)  
Office#05 Shan Plaza Sikandar Pura Hashtnagri  
Peshawar c/o Mian Muhammad Imran High Court  
Peshawar.  
Cell No.0313-9684669/0333-9577770

Subject: SHOW CAUSE NOTICE  
Memo;

Show cause notice in R/O Mr. Rahim Dad Ex-DM GMS Kayyan Manshara is attached herewith with the direction to serve the same to the concerned teacher and return one copy to this office as token of receipt duly received by him.

  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA

No. 6919


Date 01/17/2021

To

Rahim Dad Khan (Ex-DM)  
Office#05 Shan Plaza Sikandar Pura Hashtnagri  
Peshawar c/o Mian Muhammad Imran High Court  
Peshawar.  
Cell No.0313-9684669/0333-9577770

Subject: SHOW CAUSE NOTICE  
Memo;

Show cause notice in R/D Mr. Rahim Dad Ex-DM GMS Kayyan Manshara is attached herewith with the direction to serve the same to the concerned teacher and return one copy to this office as token of receipt duly received by him.

  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA



## FINAL SHOW CAUSE NOTICE

67

I, Mr. Muhammad Tanveer District Education Officer (M) Manshra, being competent authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011 do hereby serve a show cause Notice, to Mr. Rahim Dad DM GMS Kayyan for getting appointment order which is fake & fabricated/Bogus at District Battagram and there after transferred on the basis of fake inter district transfer order are, as follow:

- i. That you inducted/indulged yourself in to the Government Service fraudulently through appointment order vide Endstt:No8178-83 dated:11-03-2013 issued by DEO Battagram, which is fake and fabricated, whereas the appointment order of only five candidates as a Drawing Master were issued by the DEO(M) Battagram, in original Order and your name is not exists in this appointment order.
- ii. Whereas as per report of Head Master GHS Asharban Battagram, wherein no service record of your in the said school exists.
- iii. Whereas no attendance record, no pay record, no charge report, no academic record are found in the office of DEO (M) Battagram as well as in the office of DEO (M) Manshra.
- iv. Whereas on basis of fake & Fabricated appointment order you were allegedly transferred from GHS Arshban District Battagram, to GMS Kayyan District Manshra through inter district transfer Vide Endstt:4372-8 dated:06-08-2014, whereupon after transfer the relieving chit and the last LPC Certificate cannot be verified from the concerned authority.
- v. Whereas on the basis of fake and fabricated/bogus transfer order you have performed your duty at GMS Kayyan Manshra up to 28-04-2015 and thereafter you are absent from the school.
- vi. Whereas the Showcause notice was also served to you on absence from duty w.e.f from 15-09-2015, whereupon no reply has been received from you.
- vii. Whereas during the interview before inquiry committee, and observation of record and complete fair opportunity was provided to you for self-defiance but you could not satisfied the inquiry committee.
- viii. Whereas in above facts and circumstance and on the basis of report of inquiry committee it shows that you have committed misconduct/illegality and getting appointment on the basis of fake and fabricated appointment order. you have been proceeded under E&D rule 2011
- ix. I am satisfied that you found guilty of misconduct, corruption and committed illegal act as specified in rule 3 of the said rules. Thus you have rendered yourself liable to be proceeded against under the said rules.
- x. In exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011. The competent authority is pleased to issue show cause notice with the direction to submit your reply within 07 (seven) days of the receipt of this notice, as, why one of the major penalty under rule-4 of the said rule should not be imposed against you and also intimate whether you desire to be heard in person.
- xi. In case you failed to submit your reply within the stipulated period of time, it will be presumed that you have no defense to offer and an ex-parte decision will be taken against you.

COMPETENT AUTHORITY

Rahim Dad Khan (Ex-DM)  
Office #05 Shan Plaza Sikanadar Pur, Hashimnagri  
Peshawar c/o Mian Muhammad Inam High Court  
Peshawar.  
Cell No. 0313-9684669/0333-9577710

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INQUIRY REPORT

1	<b>Caption of Inquiry</b>	Denovo inquiry in respect of Rahim Dad Ex. DM GMS Kayan (Mansehra) in the light of judgment passed by services tribunal on 20-01-2021
2	<b>Inquiry officer</b>	Sajjad Ahmed Principal GHS Data Muhammad Rashid Principal GHSS Seri Gorla
3	<b>T.O. R</b>	Verification of appointment order and other related matter.
4	<b>Date of Inquiry</b>	The inquiry committee visited GMS Kayan on 28-02-2021 and DEO (M) Office Batagram on 01-03-2021 to probe into the matter i.e. checking relevant record of appointment.
5	<b>Brief History</b>	<p>Mr. Rahim Dad DM; GMS Kayan was appointed on 16-04-2013 at GHS Asharaban District Batagram against vacant DM post according to appointment order vide DEO (M) Batagram Endst No. 8804-8, dated 16-04-2013.</p> <p>When he was transferred from GHS Asharaban District Batagram to GMS Kayan District Mansehra, District Education office Mansehra on verification from DEO (M) Batagram and HM GHS Asharaban exposed the matter that the initial appointment of Mr. Rahim Dad was fake and fabricated. As a result, his salary was stopped and show cause notice was served to the teacher concerned. The teacher knocked at the door of Honourable High court, Peshawar through writ petition, No. 478-P/2017 for justice but the High court withdrew the case and directed to go to Services Tribunal. The Tribunal remitted back the appeal to the Department for conducting of regular enquiry for the determination of the veracity and genuineness of the appointment order of the teacher concerned, by giving appellant complete opportunity for self-defense.</p>
6	<b>Procedure</b>	<ol style="list-style-type: none"> <li>1- Interviewed Mr. Rahim Dad Ex.DM GMS Kayan on 26-02-2021 and obtained a written statement.</li> <li>2- Checked the relevant available record kept with the teacher concerned</li> <li>3- Visited GMS Kayan (Mansehra) on 28-02-2021 to check the relevant record and Questionnaire was served to the HM.</li> <li>4- Visited DEO (M) office Batagram on 01-03-2021 to check the relevant appointment record like merit list etc.</li> </ol>

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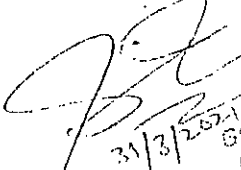
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(69)

7 Findings




- 1- Mr. Rahim Dad was interviewed, relevant documents were explored and it was observed from the appointment order kept with him that he was appointed on vacant D.M. post at GHS Asharban (District Battagram) by DEO (M) Battagram, vide order Endst No.8804-8, dated 16-04-2013. This appointment order has seven (07) appointee teachers. This appointment order is not in accordance with the merit list for the said posts and has no record in the office. Hence cannot be verified by DEO (M) office Battagram. **(Annexure A)**
- 2- The appointment order Endst No. 8178-83, dated 11-01-2013, provided by DEO(M) office Battagram for the same merit list has only five appointee teachers and the name of Mr. Rahim Dad does not exist in this appointment order. This appointment order is in accordance with the merit list and verified by the DEO(M) office Battagram. **(Annexure B)**
- 3- The date of approval/ recommendation of District Selection Committee Battagram is same on both the appointment orders i.e., 27-12-2012.
- 4- The Name of Rahim Dad is not found in the merit list for the posts of DM. **(Annexure C)**
- 5- The post is District based and the person from Peshawar cannot be appointed on this post.
- 6- According to the report of HM GHS Asharban the teacher has no service record at GHS Asharban.
- 7- Service book maintained by the teacher concerned cannot be verified by the HM GHS Asharban and DEO (M) office Battagram. **(Annexure D)**
- 8- No attendance record of the teacher concerned is found in the teacher attendance register of GHS Asharban. **(Annexure E)**
- 9- The name of the teacher concerned is not present in the Monthly Staff statement of school during his service at GHS Asharban.
- 10- No pay record is found at GHS Asharban, but he has drawn one month pay from account office Battagram.
- 11- No charge report of the teacher concerned is found at GHS Asharban.
- 12- No academic documents of the teacher concerned are found in the DEO(M) office Battagram.
- 13- Mr. Rahim Dad was transferred from GHS Asharban (District Battagram) to GMS Kayan (District Mansehra), vide Director E&SE, K P K Peshawar transfer order, Endst No. 4372-8, dated 06-08-2014. **(Annexure F)**
- 14- After transfer the relieving certificate and Last pay certificate issued to the teacher concerned cannot be verified.
- 15- According to written statement of the Headmaster GMS Kayan, in response to the questionnaire served, the teacher concerned performed his duties regularly at GMS Kayan up to 28-01-2015 and has drawn his pay up to Feb 2015. After

	<p>29-04-2015 the teacher concerned has been absent from duty. (Annexure F)</p> <p>16- On the written complaint of Headmaster, about his absence from duty, a show cause notice was served to the teacher concerned on 15-09-2015. (Annexure H)</p> <p>17- During interview and record observation, complete and fair opportunity was provided to the teacher concerned for self-defense but he cannot satisfy the inquiry committee.</p> <p>18- In his written statement the teacher concerned only emphasized on the so-called fact that his appointment order is original, without any proof. (Annexure D)</p>
<p>8. <b>Recommendation.</b></p>	<p>On the basis of above observations, it is clear that the appointment order kept with the teacher concerned is <u>fake</u> and fabricated, as it has no official record and hence cannot be verified by DEO (M) office Battagram. His service record is not found at G IS Asharban as well. It means he never performed his duties at G IS Asharban.</p> <p>Therefore, it is recommended that a stern action should be taken against the teacher concerned and the official in the D. D. (M) office Battagram involved in this fraudulent practice as per the E&amp;D rules.</p>

  
 31/3/2024  
 SAHAD AHMED  
 PRINCIPAL  
 GHS DATTA (MANSEHRA)

  
 MUHAMMAD RASHID KHAN  
 PRINCIPAL  
 GHSS SERI GORIA (MANSEHRA)

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50 روپے	112788			
ایڈوکیٹ: M. Iqbal Safi		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: BC-15-5537				
رابطہ نمبر: 0300-9031181				

بعدالت جناب: Khyber Pakhtunkhwa Service Tribunal

مخانب: Appellant	دعویٰ: Service Appeal
Rahim Ullah	علت نمبر:
بنام	مورخہ:
Sec Educator Govt	جرم:
	تھانہ:

**باعت تحریر آنگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام لکھنؤ کیلئے محمد اقبال صہابی کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 08/03/2022

العبد \_\_\_\_\_ والعبد \_\_\_\_\_

کے لیے منظور ہے۔

Attested

Accepted

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

مقام لکھنؤ  
Muhammad Iqbal Safi  
Attc

رہم داد ولد صاحب گل سنگھ  
علی اوف سید در