

S.No.	Date of Order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	19.07.2016	<p style="text-align: center;"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> <u>CAMP COURT ABBOTTABAD</u></p> <p>1. Service appeal No. 603/2014, Aurangzeb and 2. Service appeal No. 604/2014, Gulfaraz.</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:-</u></p> <p>Counsel for the appellant and Mr. Muhammad Siddique, Senior Government Pleader alongwith Mr. Zubair Ali, ADO (Litigation) for respondents present.</p> <p>2. This judgment shall dispose of service appeal No. 603/2014 tiled "Aurangzeb Versus Deputy Director (Establishment) E&amp;SE, Khyber Pakhtunkhwa, Peshawar and others", as well as service appeal No. 604/2014 titled Gulfaraz Versus Deputy Director (Establishment) E&amp;SE, Khyber Pakhtunkhwa Peshawar and others" as identical questions of law and facts are involved in both the appeals.</p> <p>3. Brief facts of the case of the appellants are that the appellants were serving as PST when subjected to enquiry on the allegations of absence from duty etc. and vide impugned order dated 26.12.2013 recovery to the tune of Rs. 535334/- at the rate of Rs. 5000/- per month was ordered against the appellant Aurangzeb treating his period of absence from duty w.e.f. 01.08.2010 to 31.07.2012 as extra-ordinary</p>

*19.07.16*

leave without pay and his promotion withheld till recovery of the said amount while recovery to the tune of Rs. 527647/- was ordered against the appellant Gul Faraz at the rate of Rs. 5000/- per month and treating his absence period w.e.f. 01.08.2010 to 17.02.2013 as extra-ordinary leave without pay and his promotion withheld till recovery of the said amount. Departmental appeals of the appellants were also rejected vide order dated 07.04.2014 and hence the instant service appeals.

4. Learned counsel for the appellants has argued that the appellants were not found absent from duty but despite their presence the impugned order was passed. That no regular enquiry was ever conducted nor any opportunity of hearing was afforded to the appellants. That the impugned orders are based on a fact-finding report and as such the same is liable to be set aside.

5. Learned Government Pleader has argued that the appellants were involved in receiving salary without teaching in the school where children of the nearby locality were not encouraged by the appellants to study in the school. That the impugned orders are based on correct appreciation of the circumstances including attitude of the appellants towards their duties and as such the same warrants no interference.

6. We have heard arguments of learned counsel for the parties and perused the record.

7. According to record no regular enquiry whatsoever was conducted in the mode and manners prescribed by rules. The appellants were not associated with the enquiry proceedings. The appellants were thus not treated in accordance with law and as such the impugned

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19.07.16.

orders are liable to be set aside.

8. In view of the above we are constrained to accept the present appeals, set aside the impugned order dated 26.12.2013 and direct that denovo enquiry in the matter be conducted by the competent authority in the mode and manners prescribed by rules within a period of 2 months from the date of receipt of this judgment, where-after order deem appropriate shall be passed by the competent authority. Parties are left to bear their own costs. File be consigned to the record room.



(Abdul Latif)  
Member



(Muhammad Azim Khan Afridi)

Chairman

Camp Court, A/Abad.

19.07.16.

ANNOUNCED

19.07.2016

18.01.2016

Appellant in person and Mr. Zubair Ali, ADO  
alongwith Mr. Muhammad Saddique, Sr.G.P for respondents  
present. Appellant requested for adjournment as his counsel  
is busy before the august Peshawar High Court, Abbottabad  
Bench. Adjourned for rejoinder and final hearing before D.B.  
to 19.07.2016 at Camp Court A/Abad.



Member

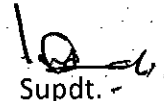


Chairman  
Camp Court A/Abad


6 20.5.2015 Appellant with counsel and Mr.Sohail Ahmad Zeb, Assistant (lit) alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Requested for adjournment. To come up for written reply/ comments on 20.7.2015 at camp court A/Abad. Status-quo be maintained.

  
Chairman  
Camp Court A/Abad

20.07.2015 Since the 21<sup>st</sup> July 2015 has been declared as a public holiday on account of Eid-ul-Fiter. Therefore case is adjourned to 14.09.2015 for submission of written reply at Camp Court Abbottabad.

  
Supdt. -

14.9.2015 Appellant in person and Mr.Sohail Ahmad, Assistant alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Written reply by respondents No.1 to 5 submitted. Learned G.P relies on the same on behalf of respondent No.6. The appeal is assigned to D.B for rejoinder and final hearing for 10.01.2016 at Camp Court A/Abad.

  
Chairman  
Camp Court A/Abad

4 18.3.2015

Appellant in person present. Due to strike of the Bar requested for adjournment. Adjourned for preliminary hearing to 19.3.2015.


  
Chairman  
Camp Court A/Abad

05 19.3.2015

Counsel for the appellant present. Learned counsel for the appellant argued that vide impugned order dated 26/12/2013 the appellant, while serving as PST, was awarded punishment in the shape of recovery of Rs.535334/- @ Rs.5000/- per month and the alleged period of absence w.e.f 1.8.2010 to 31.7.2012 was converted into extraordinary leave without pay and, furthermore, promotion of the appellant was withheld till the completion of recovery of the afore-stated amount.

That the appellant was neither absent from duty nor the afore-stated amount drawn by him as salary is recoverable from the appellant nor promotion of the appellant can be legally withheld till the recovery of the amount which the appellant has received as salary. That the appellant preferred departmental appeal against the impugned order on 9.01.2014 which was rejected vide a non-speaking order dated 7.4.2014 and hence the present service appeal on 30.4.2014.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 20.5.2015 before S.B at camp court A/Abad. No tice of application be also issued for the date fixed. Till further orders deduction shall not be made from the salary of the appellant.

  
Chairman  
Camp Court A/Abad


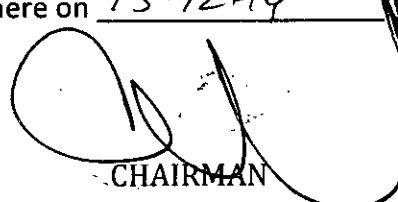


Appellant Deposited  
Security & Process Fee



Form- A  
FORM OF ORDER SHEET

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

Case No. 603 /2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	30/04/2014	<p>The appeal of Mr. Aurangzeb presented today by Mr. Tahir Faraz Abbasi Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	30-5-14	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up there on <u>15-12-14</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: center;"><i>Appellant in person present. The Tribunal is incomplete. To come up for preliminary hearing at c/o A/Abad on 19.5.2015.</i></p> <p style="text-align: right;"> Reader</p>
3	10.03.2015	<p>Counsel for the appellant submitted an application for early hearing. Application allowed. To come up for preliminary hearing on 18.03.2015 instead of 19.05.2015 at camp court Abbottabad.</p> <p style="text-align: right;"> Chairman</p>

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

Service Appeal No 603 /2014

Aurangzeb Primary School Teacher, GPS, Nari Kari, Abbottabad, Tehsil &  
District, Abbottabad

...APPELLANT

**VERSUS**

1. Deputy Director (Establishment) Elementary and Secondary Education  
Khyber Pakhtunkhwa, Peshawar & others

...RESPONDENTS

**APPEAL**

**INDEX**

Description of Document	Annexure	Page No.
Appeal alongwith affidavit	--	1-7
Addresses of the Party		8
Application alongwith Affidavit		9-10
Copy of Report of ADO Circle	"A"	11-20
Copy of Show cause Notice & Reply	"B" & "C"	21-22
Copy of Notification	"D"	23
Copy of Appeal	"E"	24
Copy of Order	"F"	25
Copy of Wakalat Nama		26

...APPELLANT

Through:

(TAHIR FARAZ ABBASI)

Advocate Supreme of Pakistan,  
Abbottabad.

Dated: 29/4 /2014



1

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

Service Appeal No 603 /2014

Aurangzeb Primary School Teacher, GPS, Nari Kari , Abbottabad, Tehsil & District , Abbottabad

...APPELLANT

**V E R S U S**

1. Deputy Director (Establishment) Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar..
2. Govt of Khyber Pakhtunkhwa Peshawar, through Secretary to Govt of KPK & E & SED Peshawar.
3. Director Elementary And Secondary Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer(M) Abbottabad.
5. Sub Divisional Education Officer (M) Abbottabad.
6. District Account Officer Abbottabad.

...RESPONDENTS

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**APPEAL U/S 4, KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER NO.F.No 34/Vol 11/PST (M) Abbottabad Dated 07-04-2014 issued by the Office of Respondent No.1, wherein the Appeal against imposition of Recovery of Rs.535,334/- from Appellant @ 5000/- Per month and showing absent period w.e.f from 01-08-2010 to 31-07-2012 converted in to Extra Ordinary leave without pay and Promotion of the Appellant is withheld till the completion of Recovery amount was filed without any reason, that the facts upon which the Appellant is penalized are without lawful Authority, against law**

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SECRETARY  
NO. 637  
30/4/2018

30/4/14

and facts. The enquiry conducted against the Appellant Ex-party and against the facts without giving opportunity of hearing, that Recovery of amount without giving reasons in Appellate order dated 07-04/2014 and Appeal is filed illegally without any fortification.

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**PRAYER:-**

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By acceptance of instant Appeal, the punishment of Recovery of amount and showing absented period in to extra ordinary leave without pay and withheld promotion, which is without any fault on the part of Appellant may graciously be set-aside and Appellant be exonerated from charges leveled against the Appellant on the basis of an Enquiry conducted Ex-party and without hearing Appellant and any adverse remarks in the service record, may graciously also be expunged.

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**Respectfully Sheweth,**

Brief facts giving rise to the instant Appeal are as under:-

1. That the appellant is old employee of Education Department and presently working as PST at GPS Nari Kari, District Abbottabad.
2. That Govt School Bata Kari was Established on 10<sup>th</sup> April 1972 in a room of locality mosque. After few

years School was shifted to near private building in the year 1984.

3. That, Govt Primary School Bata Kari remain functioning smoothly with 50/60 students up to 1992. In the year 1992 school Building was damaged due to flood and strength of the students gradually reduced.
4. That Govt Primary School Bata kari building was completely damaged due to the earthquake of 2005 and school was shifted by the order of then SDEO to Mohallah Toap. After few days the then Head Teacher Muhammad Daud shifted the school to mosque and then to private building.
5. That on 19-06-2012 the then ADO Circle shifted the school to mosque again. From 26-06-2012 up till now the school is functioning in the mosque, while building of the school is under construction from a long time.
6. That Appellant remain present on his duty and teaching with honesty and devotion and informed the department regularly with present situation.
7. That during this period different surprised and secret visits were made by officials of Education Department and Appellant was found in school performing his duty.
8. That the duration period of recovery shown in recovery notification is against facts as the Attendance Register and Attendance of Student Register shows the presence of Appellant in school, rather report of ADO Circle shows the presence of Appellant on his duty. (Copy of Report of ADO Circle is annexed as Annexure "A")

9. That the enquiry is based on malafide, against the law and facts and without hearing Appellant. Enquiry was not conducted fairly and students and their parents were not consulted and enquired.(Copy of show cause notice & Reply thereof is annexed as annexure "B' & "C")
10. That, inspite of no documentary and sound proof, on mere allegation of opponents of Appellant the Respondent penalized the Appellant without any cogent proof against the Appellant. Appellant prefer Appeal against the punishment of recovery of amount, but Respondent No.1 illegally rejected /filed the Appeal without any reason. (Copy of Recovery Notice, Appeal and order are annexed as annexure "D" "E" & "F" respectively).
11. That, being aggrieved by rejection of Departmental Appeal, the Appellant prefers the instant Appeal before this honourable Tribunal, inter-alia on the following grounds:-

**GROUNDS: -**

- a) That the impugned order of punishment of recovery of amount as well as period from 01-08-2010 to 31-07-2012 converted in to extra ordinary leave without any order leave without pay and promotion is withheld is quiet illegal and impugned order is against law and Justice and Rules of Servicves. Hence is liable to be set-aside.
- b) That the report of ADO circle is self Explanatory and record of attendance shows the presence of Appellant.

- c) That, the Decrease in number of students is due to non-availability of school building, which is still under construction, and fault of others imposed on Appellant and make him scape goat just to save their skin is highly un-justified against the law and facts.
- d) That the Enquiry report is ex-pary without adopting the proper mode and without enquiring students and their parents, enquiring from opponents of Appellant, who were interested in the transfer of their relatives in this school is highly objectionable. Hence enquiry report is not fair and nor impartial which does not carry weight of impartial enquirey and hence deserved not to be considered as impartial enquiry.
- e) That rejection / filing of Appeal by Respondent No.1 is non-speaking order and Appeal has been filed without giving any reason, which deserve immediate interference by this Honourable Court.

In view of the above facts, reasons and record attached in support of this Appeal, it is requested that the Appellant may graciously be exonerate from any kind of charge and punishment of any kind of recovery from 01-08-2010 to 31-07-2012 converting extra ordinary leave and withholding of promotion in service record may graciously be set-aside to save the innocent Appellant.

...APPELLANT

Through:

(TAHIR FARAZ ABBASI)

Advocate Supreme of Pakistan,  
Abbottabad.

**Verification:**

Verified that the contents of instant appeal are true and correct to the best of my knowledge and belief.

Dated 29/4/2014 ....Appellant

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

Service Appeal No \_\_\_\_\_ /2014

Aurangzeb Primary School Teacher, GPS, Nari Kari , Abbottabad, Tehsil & District , Abbottabad

...APPELLANT

**VERSUS**

1. Deputy Director (Establishment) Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar..
2. Govt of Khyber Pakhtunkhwa Peshawar, through Secretary to Govt of KPK & E & SED Peshawar.
3. Director Elementary And Secondary Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer(M) Abbottabad.
5. Sub Divisional Education Officer (M) Abbottabad.
6. District Account Officer Abbottabad.

...RESPONDENTS

**APPEAL**  
**AFFIDAVIT**

I, Aurangzeb appellant do hereby solemnly affirm and declare on oath that the contents of instant Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

...Deponent

Dated:- 29/4 /2014

Aurangzeb

  
 ...APPELLANT

**Identified By:**

  
 (TAHIR FARAZ ABBASI)

Advocate Supreme of Pakistan,  
 Abbottabad.

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

Service Appeal No \_\_\_\_\_ /2014

Aurangzeb Primary School Teacher, GPS, Nari Kari, Abbottabad, Tehsil & District,  
 Abbottabad

...APPELLANT

**VERSUS**

1. Deputy Director (Establishment) Elementary and Secondary Education Khyber  
 Pakhtunkhwa, Peshawar etc.

...RESPONDENTS

**SERVICE APPEAL**  
**ADDRESSES OF THE PARTIES**

Respectfully Sheweth:-

Address of the parties are as under:-

Aurangzeb Primary School Teacher, GPS, Nari Kari, Abbottabad, Tehsil & District,  
 Abbottabad

...APPELLANT

**VERSUS**

1. Deputy Director (Establishment) Elementary and Secondary Education Khyber  
 Pakhtunkhwa, Peshawar etc.
2. Govt of Khyber Pakhtunkhwa Peshawar, through Secretary to Govt of KPK & E &  
 SED Peshawar.
3. Director Elementary And Secondary Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer(M) Abbottabad.
5. Sub Divisional Education Officer (M) Abbottabad.
6. District Account Officer Abbottabad.

i. ...RESPONDENTS

Through:

  
 ...APPELLANT

(TAHIR FARAZ ABBASI)

Advocate Supreme of Pakistan,  
 Abbottabad.

Dated: 29/11/2014

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

Service Appeal No \_\_\_\_\_/2014

Aurangzeb, Primary School Teacher, Govt. Primary School Teacher, Nari Kari  
Abbottabad

...APPELLANTS

VERSUS

Deputy Director (Establishment) Elementary and Secondary Education Khyber  
Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

**SERVICE APPEAL**

**APPLICATION** FOR RESTRAINING RESPONDENTS  
FROM RECOVERY OF AMOUNT FROM PAY OR  
OTHER INCOME OF APPELLANT TILL DECISION OF  
APPEAL.

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Respectfully Sheweth:-

1. That, the above titled appeal is being filed before this Honourable Court and the present application is integral part of the same.
2. That, as per facts of the case, appeal is prima facie strong, balance of convenience is in favour of



appellant and in case of recovery poor appellant shall suffer badly and irreparable loss.

It is, therefore, requested that till decision of appeal, respondents be restrained form recovery of amount.

  
...APPELLANTS

Through:



(TAHIR FARAZ ABBASI)  
Advocate Supreme Court of Pakistan,  
Abbottabad.

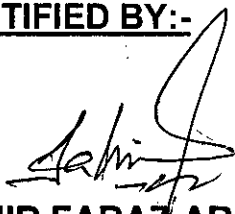
Dated:- 29/04/2014

**AFFIDAVIT:-**

I, Aurangzeb Govt. Primary School Teacher, Nari Kari Abbottabad **appellant**, do hereby solemnly affirm and declare that the contents of forgoing **application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

  
DEPONENT

**IDENTIFIED BY:-**



(TAHIR FARAZ ABBASI)  
Advocate Supreme Court of Pakistan,  
Abbottabad



29/4/14

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ -

Annexure "A"

تاریخ: 16/4/2011 کو نوٹیفکیشن سہولت سکول میں لکھی گئی تھی تاکہ اساتذہ کرام کو اطلاع دی جا سکے۔

یڈر میٹر: سولہ مدرسے (اساتذہ اور سہولت سکول) اور چار شاخہ اسکولوں میں نوٹیفکیشن۔

کامیابی طلباء: 2000, 2000, 2000, 2000, 2000, 2000, 2000, 2000, 2000, 2000  
NIC, NIC, NIC, NIC, NIC, 2/3

گزارت: اساتذہ اور سہولت سکول اور چار شاخہ اسکولوں میں سہولت سکول کے نام سے نوٹیفکیشن جاری کیا گیا ہے۔  
تعمیراتی نذر: سکول میں جو خرچ صرف دو کمرے موجود تھے - آرائش کا کام نہیں کیا گیا۔  
دعوت: نہیں دی گئی۔

صلہ برائے سکول کما می مہلے سے جو خرچہ لکھی گئی ہے۔ سکول کے نام سے نوٹیفکیشن جاری کیا گیا ہے۔

Enrollment 1972 میں سہولت سکول اور اساتذہ سکول میں - 3000

نوٹیفکیشن - سکول کو سہولت سکول کے نام سے جاری کیا گیا ہے تاکہ اساتذہ کرام کو اطلاع دی جا سکے۔  
تعمیراتی نذر: اساتذہ سکول اور سہولت سکول میں

APD  
Shanazai  
Assistant District  
E & Sec  
16/2011

Dy: District Officer  
(M/P)E&SE A/Abad

سوال نمبر 240 کے لیے شراکت کا ADP کیلئے امریکی GPS کے کیری ایبل

240

سوال نمبر 240 کے لیے لاجر ADP کے بارے میں سوال

جو کہ اس میں سے کئی کو اپنا حارج سمجھتا ہے

سوال نمبر 240 کے لیے GPS کے کیری ایبل کے بارے میں سوال

جو کہ اس میں سے کئی کو اپنا حارج سمجھتا ہے

سوال نمبر 240 کے لیے GPS کے کیری ایبل کے بارے میں سوال

جو کہ اس میں سے کئی کو اپنا حارج سمجھتا ہے

سوال نمبر 240 کے لیے GPS کے کیری ایبل کے بارے میں سوال

جو کہ اس میں سے کئی کو اپنا حارج سمجھتا ہے

سوال نمبر 240 کے لیے GPS کے کیری ایبل کے بارے میں سوال

سوال نمبر 240 کے لیے GPS کے کیری ایبل کے بارے میں سوال

جو کہ اس میں سے کئی کو اپنا حارج سمجھتا ہے

سوال نمبر 240 کے لیے GPS کے کیری ایبل کے بارے میں سوال

کراچی کی موجودگی میں ڈی ڈی (D.D) فزیکل کونٹریکٹ کے تحت اس کے دورے کے  
 سے دور میں حساب ڈی ڈی ماہ ماہ مئی ۱۹۸۵ء میں پیش کیے گئے

۱۰

پتہ کراچی کو منسٹریل سائٹ کے لیے ایک ڈی ڈی فزیکل کونٹریکٹ ہے  
 میری تجویز یہ ہے کہ مشرعیوں اور افسران PST GPS کنڈیٹا اور مشرعیوں اور افسران PST  
 GPS ڈیٹا کو اگر GPS پتہ کراچی میں شراکتیں کیا جائے تو سکول فنڈیشنل  
 ہو سکتا ہے۔ اور دوسرے پروگراموں کے اعداد میں اضافہ ہوگا۔ جب سکول کی قیمت کا کام  
 مکمل ہو جائے گا تو سکول کے اعداد میں اور زیادہ اضافہ ہو سکتا ہے۔

۱۱۔ ایک چیلنج میں GPS پتہ کراچی کے نان منسٹریل سائٹ کے ذمہ دار کون ہیں؟ اگر GPS  
 پتہ کراچی کا سکول کانسٹرکشن کیا جائے تو اس کے لیے جو رقم ہے اسے

سورہ ۱۰۔ GPS پتہ کراچی کے نان منسٹریل سائٹ کے *Construction Progress* کے ذمہ داروں  
 درج ذیل ہیں۔

- ۱) سکول کے عمارت کا نیا ہونا۔
- ۲) اساتذہ کی عدم دستیابی۔
- ۳) لوگوں کا اساتذہ کی عدم اعتماد دینا۔

GPS پتہ کراچی کا مستقبل یہ ہے کہ اگر وہ پتہ کراچی میں سکول اور مشرعیوں اور افسران  
 کو تبدیل کیا جائے تو سکول فنڈیشنل ہو جائے گا۔ سکول کے عمارت کا مسئلہ  
 حل ہونے تک اسے مسجد میں چلایا جائے۔ لوگوں کو اعتماد میں لانے کے لیے  
 سکول میں ایک فنڈیشن منظم کرنا چاہیے۔

(14) 9 (272)

## INQUIRY REPORT

01	Caption of inquiry	Govt Primary School Batta Kari Kalabagh
02	Date of Inquiry	02/08/2012
03	Inquiry Officer	Nisar Ahmed Principal GHS Mir Pur Abbottabad
04	Brief History of the case	<p>GPS Bata Kari is situated near Barmi Gali Bazar Kala bagh U/C Nagri Bala NA 18 &amp; PF 48 district Abbottabad.</p> <p>The school was established on 10<sup>th</sup> April 1972 in a room of locality Mosque.</p> <p>After some time the school was shifted to near private building.</p> <p>In 1984 the school was shifted to newly Govt Building.</p> <p>The school was smooth functioning with 50 -60 students up to 1992.</p> <p>In 1992, the Building of the school was damaged due to flood and the strength of the students gradually reduced.</p> <p>Due to the earthquake 2005, the school building was totally damaged, so vide Mr Zaffar Pervez ex DEO(primary) the school was shifted to Toap. After few days Mr Mohammed Daud PST( ex head teacher) shifted the said school to the mosque on his own will.</p> <p>Mr Gul Faraz (ex head Teacher retired) shifted the school in his house on his own will.</p> <p>Mr sharafat Khan (Present ADO Circle) on 19/6/2012 shifted the school to mosque again.</p> <p>From 26/6/2012 to up till now, the school is functioning in a mosque without any student, but one PST &amp; one Chowkidar are working.</p> <p>The building of the school is under construction from a long time.</p>
05	Reference	<p>EDO (E &amp; S) Abbottabad vide letter Endst No, 12756/EB-iv/visit inquiry report of non functional school <u>GPS Batta Kari</u> Abbottabad, dated 17/7/2012, appointed the undersigned as inquiry officer regarding the,</p> <p>Building of the GHOST SCHOOL ✓</p> <p>Students attendance/strength ✓</p> <p>Teachers attendance ✓</p> <p>Class iv attendance. ✓</p>

Invested

22/4/14

Assistant District Officer  
(E & S) Education  
Abbottabad

CTC

Assistant District Officer  
Elementary & Secondary  
Education, Abbottabad, S

15

51

271

Procedure

As. Inquiry officer, I

Visited GPS Batta Kari on 02/8/2012, got written

- 1- statements of local persons, (Annexure A I & A II)
- 2- Ex-Head Teacher Mr Gul faraz & Aurangzeb (Annexure B I, II)
- 3- Present H/Teacher Mr Mohammad Alyas (Annexure C)
- 4- ADO Circle Mr Sharafat Khan (Annexure D)
- 5- Collect data from EMIS section. (Annexure E)
- 6- AWR at EDO (E & S) at Abbottabad office (Annexure G)
- 7- Teachers/ Att Register at EDO (E & S) office (Annexure H)
- 8- Students/ Att Register at EDO (E & S) office (Annexure I)

*Investigation*  
*22/4/14*

Assistant District Officer  
 (E & S) Education  
 Abbottabad

BUILDING

GPS Bata Kari was functioning in a mosque and then in private building from 1972 to 1983.

In 1984, it is shifted to its newly built Govt building. Here, it was functioning till 2005, after the earthquake 2005, the building was damaged and the school was shifted to the place (Toap) by the order of DDO of that time.

According to EMIS record, the 2 kanals land is of the Goyt property, where the school is situated.

The two rooms building of the school is under construction for a long time.

Students Strength:-

Vide written statements of the teachers and ADO circle, 362 students are confirmed to on roll from 1972 to 2012 (40 years).

On 06/6/2011, vide ADO circle, the attendance was as under,

Zero	KG	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>	Total
03	02	Nil	Nil	Nil	Nil	Nil	05

Vide EMIS record of recent three years

2009	Zero	KG	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>	Total
	07	08	01	03	01	nil	nil	20

2010	Zero	KG	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>	Total
	nil	10	02	01	01	04	nil	18

2011	Zero	KG	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>	Total
	05	08	08	nil	nil	nil	nil	21

Students strength didn't match in different available records, entered by same teacher. The perusal of the AWR confirms that the same was factiously maintained and apparently bearing the tampered signature of Ex ADOs circle.  
 Log Book, Stock register of school and PTC funds record are still lying in custody of Gulfraz PST, didn't provide on demand.

07 Findings

2

22/11/12  
Assistant District Officer  
(E & S) Education  
Abbottabad

16  
276

Two PST posts and one class iv post in this school. On the visit of present DO Edu on 13/06/2012, Mr. Aurangzeb PST was transferred to GPS Nari Kari. Mr. Ilyas PST was transferred from Nari Kari to this school, he took over the charge on 26/06/2012. He admitted that no student came to school in his period. The school record is in EDO Office Abbottabad. Mr Gul Faraz PST was on Medical leave, and retired on 31<sup>st</sup> July 2012. Mr Khursheed is on class iv post since 01/10/1989. He admitted that there is no student in the school since last six months. Presently the School is running with one PST Mr. Mohammed Ilyas and a class iv Mr khursheed.

### ADO Circle Remarks

Present ADO circle Mr Sharafat Khan after taking over the charge visited this school on 06/6/2011 and submitted the report with proposal to Dy DO(P) Attd about the bad condition of the school.

He also informed the officer concern time and again, that the people's of the locality demanded the transfer of both teachers, Mr Gul Faraz & Aurangzeb from GPS Bata Kari. Both teachers are responsible for nil attendance of the students in the school.

The above mentioned facts confirm that the report of DO Edu (E & S) is based on reality.

The school is non functional (GHOST SCHOOL) after the earthquake October 2005.

Teachers, Cluster Head, ADO circle & Dy DO Primary of prescribed time period are responsible to this great loss.

After the flood 1992, the teachers didn't take keen interest for the battement of the school.

Now they are the agents of private schools of some religious groups. Present PST teacher (Mohammad Ilyas) is a master trainer of DAWA Schools system. He is a neighbor of the the mosque, where the school is functioning now a days, he couldn't improve the attendance of the students so far.

Parents prefer to admit their kids in private institutions.

### Recommendations

There are several Govt & Private Primary Schools in the locality and there is no need of this school.

1-Vide the report of present ADO Circle, the school should be shifted to nearest GPS Nari Kari.

3

*Handwritten notes:*  
22/4/14

**Joint District Office  
(E & S) Education  
Abbottabad**

- 2- Present staff should be transferred to the needy schools.
- 3- The pay of the staff should be stopped immediately till the decision of future of school and pay already got for last 24 months be recover from
  - I) Gul fraz PST
  - II) Aurang zaib PST
- 4- After the audit, pay of the staff, PTC funds & other funds should be recovered by the staff on the school record before 26/6/2012 & deposited in Govt treasury as soon as possible.
- 5- All the responsible officers should be punished according to the rules.
- 6- Log Book, Stock register of school and PTC funds record are still lying in custody of Gulfraz PST which need to be recovered.
- 7- As responsibility also lies on Gulfraz PST so his pension case should not be moved to higher Offices till the clearance of matter.

*(Signature)*  
NISAR AHMED

Inquiry officer

Principal GHS Mir Pur Abbottabad

NO. 93 Dated 06/8/212

Copy to

- 1- EDO (E & S) Abbottabad vide his letter No, Endst No, 12756/EB iv /visit GPS Bata Kari datec 17/7/2012

*(Signature)*  
NISAR AHMED

Inquiry officer



(18)

To letter no. 160 dated 25 August 2012

INQUIRY REPORT

GPS BATTI KERI-ABBOTTABAD AS NON FUNCTIONAL SCHOOL

01	Caption of inquiry	Govt Primary School Batta Keri Abbottabad
02	Reference	EDO office letter no.13989/EB-IV/Visit dated 07-08-2012.
03	Date of inquiry	13-08-2012 ✓
04	Inquiry Officer	Khurshid Ahmed Principal GHS Banda Pir Khan-Abbottabad
05	Brief History of the case	<p>GPS Batta Keri is situated near Barmi Gali Bazar, Kala Bagh, U/Nagri Bala, NA-18 and PF- 48 district Abbttabad. The school was established in a room of local mosque in 1972. After some time the school was shifted to a private building. In 1984 the school was shifted to newly constructed Govt Building. Record (AWR) shows that total <u>207 students</u> were enrolled in 21 years including 19 re-admitted cases from 1972 to 1992. In 1992 the building of the school was damaged due to flood and the strength gradually reduced. In 2005 the building was totally damaged due to earthquake and the school was shifted to Toap by the order of Deputy DO of that time. After few days the head teacher Mr. Muhammad Daud shifted the school to the mosque again on his own will. Mr. Gul Fraz (Ex Head teacher-now applied for retirement) shifted the school to his house without consulting the authority concerned. Mr. Sharafat Khan (present ADO) shifted the school to the same mosque again on 19-06-2012. ✓</p> <p>From 26-06-2012 the school is functioning in the mosque <b>without an student</b>. One PST and a Chowkidar are still working there. The building is under construction for a long time (work stopped) but could not be completed so far by the ERRA.</p>
06	Procedure	<p>As an inquiry officer the undersigned visited the school on 13 August and collected the data as shown below:-</p> <ul style="list-style-type: none"> <li>a. Statement of Ex Head Teacher Mr. Gul Fraz, PST -A ✓</li> <li>b. Statement of Ex Teacher Mr. Aurangzeb, PST -B ✓</li> <li>c. Statement of Mr. Muhammad Ilyas (present H/T) -C ✓</li> <li>d. Statement of Mr. Sharafat Khan, ADO Circle -D ✓</li> <li>e. AWR collected from EDO(E&amp;SE) Office, Atd -E ✓</li> <li>f. Teachers &amp; Students Attendance Registers collected from EDO(E&amp;SE) Office -F ✓</li> <li>g. Three statements of local persons -G&amp;H ✓</li> </ul>

*Handwritten:*  
 Avested  
 22/4/14

*Stamp:*  
 Assistant District Officer  
 (E & S) Education  
 Abbottabad

*Stamp:*  
 Assistant District Officer  
 Elementary & Secondary  
 Education Abbottabad

07 Findings

- a. According to the EMIS record, 02 kanal land is of the govt property where is the school is being reconstructed.
- b. Strength of classes in EMIS data and AWR don't match.
- c. Year wise strength of the school according to AWR is as under:-

Year	Str	Year	Str	Year	Str	Year	Str
1972	34	1983	07	1994	05	2005	05
1973	14	1984	05	1995	05	2006	07
1974	07	1985	06	1996	05	2007	06
1975	12	1986	12	1997	05	2008	07
1976	12	1987	01	1998	15	2009	04
1977	07	1988	16	1999	20	2010	04
1978	05	1989	12	2000	Nil	2011	11
1979	07	1990	08	2001	19	2012	*03
1980	12	1991	05	2002	11	-	-
1981	11	1992	08	2003	01	-	-
1982	06	1993	12	2004	20	-	-

\*Note: 03 students were shown only on AWR whereas head teacher could not produce them physically. ✓

- d. Perusal of AWR confirms that the same was factiously maintained with tampered signatures of ex ADO(s). ✓
- e. Log Book, Stock Register and PTC Fund record is still lying in the custody of ex head teacher Mr. Gul Fraz, PST. He didn't provide on demand.
- f. **Staff:** There were two PST posts and a Chowkidar post in the school. DO (E&SE), on his visit to the said school, has transferred Mr. Aurangzeb to GPS Nari Keri and Mr. Ilyas, PST has been adjusted in his place from GPS Nari Keri to this school keeping in view the worst condition of the school.
- g. The teachers of the school were drawing pay since long without improving condition of the school.
- h. Inquiry report by DO (E & SE) vide letter no 11596-601 dated 18-06-2012 is based on facts. ✓

08 Recommendations

- a. As Mr. Gul Fraz, PST has recently applied for pension without providing record of the school so his pension case must not be forwarded to higher authority without clearance.
- b. As almost all students have been admitted to private schools (approachable) by the parents so there is no need of this school in near future. And hence the school should be shifted to the nearest GPS Nari Keri or Girls Primary school of the same village i.e Bata Keri.
- c. All the teachers/staff of GPS Bata Keri must be transferred to some other needy schools.
- d. It is also the negligence of concerned ADO(s) and Deputy DO(s)

Assistant District Officer  
E & S Education  
Abbottabad

A. U. S. Khan  
22/11/14

who took it light and threw the ...  
necessary action should be taken against them according to rules.  
Pay of the current academic year (April 2012 onward), PTC funds,  
and other funds must be recovered from the said teachers and  
pay hence forth should be stopped immediately till decision of  
future of the school.

20

- f. Log book, stock register and PTC files are still in the custody of Gul Fraz, PST which needs to be recovered.
- g. Department should also take keen interest for the completion of all such schools which are under construction because no school can function better without proper building.

*Handwritten signature*  
22/8/12

*Handwritten signature*  
KHURSHID AHMED  
(INQUIRY OFFICER)  
PRINCIPAL GHS BANDA PIR KHAN- ABBOTTBAD

No. 160 dated 25 August 2012  
(Page # 01 to 03)

Assistant District Officer  
(E & S) Education  
Abbottabad

*Handwritten Urdu notes:*  
مذکورہ کے بارے میں  
مکمل طور پر جاننا  
مطلوب ہے۔

3

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

SHOW CAUSE NOTICE

Annexure "B"

I, Muhammad Riaz Swati District Education Officer (Male) Abbottabad as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) rules, 2011, do hereby serve you Mr. Aurangzeb PST Government Primary School Batta Keri Abbottabad follows:

- a) As per inquiry report in respect of GPS Batta Keri (Non functional school) submitted by Sub Divisional Education Officer (M) Abbottabad vide his letter No. 2551 dated 30.10.2012, No. 2822 dated 29.11.2012 & No.222 dated 28.01.2013 you have been found absent from duty w.e.from 01.08.2010 to 31.7.2012
- b) You have illegally/fraudulently drawn an amount of Rs. 535334/- for the absent period w.e.from 01.8.2010 to 31.7.2012 without performing your duty.
- c) In exercise of the power conferred by the Khyber Pakhtunkhwa. Govt: servant (Efficiency & Discipline) rules, 2011, the Competent Authority is please to serve you with the instant show cause notice regarding your willful absence from duty and illegally drawl of Rs. 535334/- with the direction to submit your defence in writing within seven days of the issuance of this notice as to why the major penalty of rule 4 (b) of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person.
- d) In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-parte decision will be taken against you.

*Aurangzeb*  
*22/4/14*

*M. Riaz Swati*  
COMPETENT AUTHORITY

Mr. Aurangzeb, PST  
GPS Bata Keri  
Assistant District Officer  
(E & S) Education  
Abbottabad

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (مردانہ) ایبٹ آباد۔

## Annexure "C"

عنوان:- جواب Show Cause Notice بمطابق چھٹی نمبری 10:22

مورخہ 09-02-2013 وصول کردہ 11-02-2013۔

جناب عالی! جواب شوکاژ نوٹس ذیل عرض ہے۔

۱۔ یہ کہ مورخہ 01-08-2010 سے لے کر 31-07-2012 تک سکول کے معائنے جنکار یکاڑ رڈ رجسٹر حاضری مدرسین رجسٹر حاضری طلباء موجود ہے۔  
۲۔ یہ کہ سائل ADO سرکل کی رپورٹس صفحہ نمبر ۵ تا ۵۵ جو کہ منسلک ہیں اور میری پر پوزل بھی جو کہ ADO سرکل نے دی ہیں جن کار یکاڑ درج ذیل ہے۔ مورخہ 01-08-10 سے لے کر مورخہ 31-07-12 تک سائل نے محکمہ کو بارہا درخواستیں دی مورخہ 30-08-10 صفحہ نمبر ۵۷، مورخہ 06-12-10 صفحہ نمبر ۵۸، 04-01-11 صفحہ نمبر ۵۹، 16-08-11 صفحہ نمبر ۱۵، 09-12-11 صفحہ نمبر ۱۱، 15-03-2012 صفحہ نمبر ۱۲ جن پر کوئی عمل درآمد نہ کیا گیا۔ تاہم 2 عدد پر پوزل ٹرانسفر ADO سرکل نے ڈپٹی DO صاحب کو دی جن پر کوئی عمل در آمد نہیں ہوا۔

۳۔ یہ کہ انکوائری سراسر غلط ہے کیونکہ انکوائری آفیسر نے علاقے کے لوگوں اور زیر تعلیم بچوں کے والدین سے انکوائری نہیں کی۔ ماسوائے دو اشخاص محمد صدیق اور علی بنیامین سے انکوائری کی۔ محمد صدیق جو کہ عتیق الرحمن PST کا والد ہے اور بنیامین محمد الیاس PST کا بھائی ہے۔ ہر دو ٹیچرز سکول میں اپنی تعیناتی پر زور لگا رہے تھے۔ سائل تمام تر حقائق پیش کرنے کیلئے ہر وقت تیار ہے جو کہ حقیقت پر مبنی ہیں۔ سکول کی تعداد کم ہونے کی وجہ بلڈنگ اور سرگز دعویٰ کا سکول کھلنا چاہیے۔ سکول میں قریبی محلہ توپ کے بچے زیر تعلیم تھے اب جو کہ سکول مسجد میں چل رہا تھا جو کہ فاصلہ زیادہ ہونے کی وجہ سے پرائمری سکول ڈونگ میں چلے گئے۔ مقامی محلہ کے لوگ قدامت پسند (بڑی لوگ) تھے جو اپنے بچوں کو دعویٰ سکول میں لے گئے۔

۴۔ یہ کہ سائل بیمار ہے۔ سائل کی دونوں ٹانگیں اور بازو 1992ء کے فلڈ میں ٹوٹ گئی تھیں اور سائل اپنی بیماری کی وجہ سے ہسپتال آیا ہوا تھا اس دوران DO (میل) ایبٹ آباد نے سکول ریکارڈ محمد الیاس PST سے منگوا لیا اور اپنے قبضے میں لے لیا۔ جس کی وجہ سے سکول کار یکاڑ انکوائری کے وقت پیش نہ کیا جاسکا کیونکہ ریکارڈ دفتر میں موجود تھا۔

عالی جا! سکول بند کر دیا گیا اور پھر سکول میں دو سائزہ کرام کا آرڈر کر دیا گیا اور سکول تاحال اسی تعداد پر چل رہا ہے۔

۵۔ یہ کہ سائل تمام تر حقائق زبانی طور پر جناب کے حضور عرض کر سکتا ہے۔ اور ساتھ لطف سے ہیں۔

لہذا استدعا ہے کہ سائل پر رحم کرتے ہوئے سائل کی ریکوری کو ختم کیا جائے اور سائل کو دوبارہ ایڈجسٹ کیا جائے۔

جناب کی نوازش ہوگی۔

المرقوم: ۱۳/۰۲/۱۸

العارض

گلفراز PST، GPS، بٹہ کیری تحصیل ضلع ایبٹ آباد۔

شناختی کارڈ نمبر: 7-5386749-13101

رابطہ نمبر: 0341-5298698

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

Annexure "D"

WHEREAS you, Mr. Aurangzeb PST GPS Nari Keri Abbottabad was proceeded for having committed the following gross irregularities which constitute inefficiency, misconduct and corruption under Rule 3, Sub Rules (a), (b) and (c) of the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011:

AND WHEREAS as per inquiry report in respect of GPS Bata Keri (Non functional school) submitted by Sub Divisional Education Officer (Male) Abbottabad vide his letter No.2551 dated 30.10.2012 and No. 2822 dated 29.11.2012 you Mr. Aurangzeb, PST while posted at GPS Bata Keri remained absent from duty w.c.from 01.8.2010 to 31.7.2012. You have illegally/fraudulently drawn an amount of Rs. 535334/- without performing your duty.

AND WHEREAS a Show Cause Notice was served upon you through Sub Divisional Education Officer (M) Abbottabad vide this office No. 1022 dated 09.02.2013 under charge of wilful absence and irregular drawl of Rs. 535334/-

AND WHEREAS your reply received vide Sub Divisional Education Officer (M) Abbottabad letter No.568 dated 04.3.2013 and was found unsatisfactory.

AND WHEREAS you have been found guilty of misconduct, inefficiency and absenting yourself for the period w.c.from 01.8.2010 to 31.7.2012 (202 days) and irregular and unauthorized drawl of Rs. 535334/- from the Govt. Exchequer.

NOW THEREFORE in exercise of Powers conferred by the Khyber Pakhtunkhwa Govt. servant (Efficiency & Discipline) Rules-2011, the undersigned being Competent Authority is hereby pleased to impose recovery of Rs. 535334/- (Five lac thirty five thousand three hundred & thirty four) @ Rs.5000/- PM upon Mr. Aurangzeb PST GPS Nari Keri with immediate effect. Moreover, absent period w.c.from 01.8.2010 to 31.7.2012 is converted into Extra Ordinary Leave without pay and promotion of the accused official is hereby withheld till the completion of recovery amount.

DISTRICT EDUCATION OFFICER (M)  
ABBOTTABAD

Dated 26-12-2013

Indst. No. 9995-98 /F.No.1 Vol-II

Copy forwarded to the:-

1. Secretary to Govt. of Khyber Pakhtunkhwa E&SED Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. District Accounts Officer Abbottabad
4. Sub Divisional Education Officer (Male) Abbottabad w/r to his No. 568 dated 04.3. 2013 with the direction that entry should be recorded in the service book & deduction/recovery be made accordingly under intimation to this office.
5. Official concerned.

DISTRICT EDUCATION OFFICER (M)  
ABBOTTABAD

Assistant District Officer  
(E & S) Education  
Abbottabad

*D/ASST I/A/B/Brund*  
*Please deduct the recovery as mentioned in order.*

*A. Anees*  
*22/12/13*

*P 70*

29


~~"C" Shikhar~~

Office of The Sub-Divisional Edu: Officer (M) Abbottabad

Encl: NO 3982-84 | F.No. | dated 30-12-13

Copy to:

- 1 - The ASDEO Circle Nathegali for perusal of the serial letter & also directed that entry should be made/recorded in the G/B of the school concerned & put up for signature of the U/Signed immediately.
- 2 - The Accountant Local office with the requis to do the needful in the light of above letter of ASDEO (M) and under intimation to the C/authority as directed.
- 3 - The District Education Officer (M) Abbottabad with his no. 2, dated above for information.

  
 Sub-Divisional Education Officer (M) Abbottabad

خدمت جناب ڈائریکٹر صاحب ایجوکیشن ڈیپارٹمنٹ خیبر پختونخواہ پشاور

DEO (M)  
Abbottabad

اپیل برائے معافی ریکوری مابیت برائے سکول مدرسین (1) گلزار ازاوول مدرس  
(2) اورنگ زیب نائب مدرس، گورنمنٹ برائے سکول تہہ کبریٰ سرکل تھانگی

For detail  
report  
جناب صاحب  
10/11/2014

گزارش ہے کہ سائین بر DEO صاحب نے (یو۔ غیر حاضری) مورچہ 01-08-2010 سے 31-07-2012 تک ریکوری ڈال لی ہے۔ چونکہ سرسفل ہے جناب عالی اس عرصہ میں دونوں مدرسین سکول میں حاضر رہے اور اسی دوران محکمہ کے Dy. DO اور IADO صاحبان نے کئی بار اچانک معائنے بھی کئے اور مذکورہ بالا مدرسین کو سکول میں مصروف کار پایا گیا۔ (جس کا ثبوت منسلک ہے جن میں رپورٹ / پروپوزل ADO سرکل تھانگی کے بھی شامل ہیں)۔ جناب عالی! سکول کی تعداد کم ہونے کی وجہ سے سکول کی عمارت کا نہ دانا ہے کیونکہ سکول لہذا کی عمارت 2005ء کے زلزلہ میں بڑی طرح متاثر ہوئی تھی اور محکمہ کو کئی بار اس کی اطلاع بھی دی گئی مگر کوئی شنوائی نہیں ہوئی۔ آخر کار ERRا نے دوبارہ تعمیر کی خاطر 2010ء میں عمارت کو مکمل طور پر اکھاڑ دیا جس پر تاحال 2014ء تک کام مکمل نہیں ہو سکا اور ابھی تک چھت ڈھیر ڈالنی باقی ہے۔ اسی وجہ سے سکول کو مسجد میں شفٹ کیا گیا جو کہ زیر تعلیم حلقہ ٹوپ کے بچوں سے زیادہ فاصلے پر واقع تھی۔ اور اسی وجہ سے زیر تعلیم حلقہ ٹوپ کے بچے قریبی سکول، ڈونگ، مسجد سکول کرٹی اور دیگر پرائیویٹ سکولوں میں چلے گئے۔ جس کی اطلاع محکمہ کے افسران بالا کو متعدد بار دی گئی مگر کوئی عمل نہ ہو سکا۔ اس دوران مدرسین کی جانب سے متعدد بار اپنے جانوروں کے لئے درخواستیں ڈپٹی ایجوکیشن آفیسر کو ارسال کی گئیں اور ان درخواستوں پر عمل کرتے ہوئے دونوں مدرسین کے تبادلے کے پروپوزل بھی تیار کئے گئے۔ مگر ان پر اس دوران کوئی پیش رفت نہ ہوئی۔ تاہم اس عرصہ میں ہم دونوں مدرسین اپنے سکول میں باقاعدہ ڈیوٹی سرانجام دیتے رہے اور موجود بچوں کی تعلیم و تربیت کا سلسلہ بھی جاری رکھا (جس کے تمام ثبوت لف ہیں)۔ لیکن اس کے بعد 10 جون 2012ء کو DEO جناب ظفر ارباب صاحب سکول ریکارڈ (رجسٹر داخل حارین، رجسٹر حاضری تک تمام ثبوت لف ہیں)۔ لیکن اس کے بعد 10 جون 2012ء کو DEO جناب ظفر ارباب صاحب سکول ریکارڈ (رجسٹر داخل حارین، رجسٹر حاضری مدرسین، رجسٹر حاضری طلباء اور لاگ ایک) اپنے ساتھ لے گئے اور ابھی تک مذکورہ سکول ریکارڈ واپس نہیں کیا گیا۔ لہذا گزارش ہے کہ سکول کا مذکورہ تمام ریکارڈ طلب کریں اور اسے دیکھ کر فیصلہ صادر فرمائیں۔

جناب عالی! مندرجہ بالا حقائق اور ثبوت کے باوجود محکمہ نے ہمیں غیر حاضر تصور کرتے ہوئے ہمارے ذمہ ریکوری مبلغ 5,27,647/- روپے مندرجہ ازاوول مدرس اور مبلغ 5,35,334/- روپے مندرجہ مدرسین، اورنگ زیب ڈال دی گئی جو کہ سرسفل زیادتی اور ہم غریب مدرسین کے ساتھ ظلم ہے۔ لہذا جناب سے گزارش ہے کہ مندرجہ بالا حقائق کی روشنی میں ہم دونوں مدرسین پر دم کرتے ہوئے ہماری ریکوری کے آرڈر کو منسوخ کر کے ہمیں اس پریشانی سے نجات دلائی جائے تاکہ ہم دونوں مدرسین اپنی تعلیمی خدمات کو بہتر طریقے سے سرانجام دے سکیں۔ امید ہے کہ آپ جناب ہماری درخواست پر ہمدردانہ طور پر فرما کر ہماری داد رسی کریں گے۔ ہم آپ کی دراز کی عمر کے لئے تازیت دعا گو ہیں گے۔

ارضیہ

2۔ اورنگ زیب  
PST

1۔ گلزار  
PST  
10/11/2014

*(Handwritten signature)*



(25)

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

Annexure "F"

F No.34/Vol:II/PST (M) Abbottabad

Dated Peshawar the ~~7/3/2014~~ 2014.

7/4/2014

To.

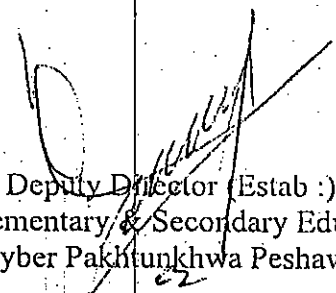
The District Education Officer (M)  
Abbottabad.

Subject: -

**REPLY OF APPEAL IN RESPECT OF MR.GUL FARAZ PST**  
**AND AURANGEB PST REGARDING RECOVERY.**

Memo:-

I am directed to refer to your letter No.769/F.No1/Vol:II dated 01.02.2014 on the subject noted above and to state that the case in respect of Mr. Gul Faraz PST and Mr. Aurangzeb PST GPS Bata Keri Abbottabad has been filed.

  
Deputy Director (Estab :)  
Elementary & Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.

Endst: No. 7752-53<sub>1</sub>

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Local Office.

Deputy Director (Estab :)  
Elementary & Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR AT CAMP COURT ABBOTTABAD.**

**APPEAL No.603/2014**

AURANG ZEB.....Appellant

**VERSUS**

DY: DIRECTOR ESTABLISHMENT & OTHERS.....Respondents

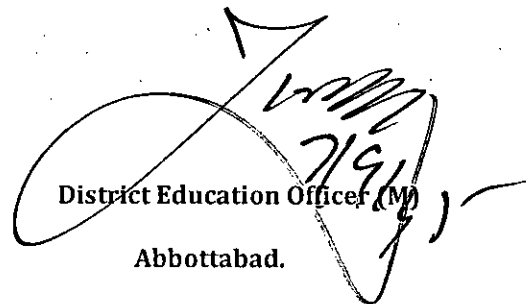
Comments on behalf of Respondents No. 1 to 5

**SERVICE APPEAL**

**INDEX**

<b>Sr.No</b>	<b>Description</b>	<b>Page Nos</b>	<b>Annexures</b>
1	Comments alongwith affidavit	1 to 4	
2	Copy of inquiry report dated 02.08.2012	5 to 8	"A"
3	Copy of inquiry report dated 25.08.2012	9 to 11	"B"
4	Copy of letter No. 2551 dated 30.10.2012	12	"C"
5	Copy of letter No. 2822 dated 29.11.2012	13	"D"

Dated /09/2015

  
District Education Officer (M)  
Abbottabad.

(Respondent No. 4)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR AT CAMP COURT ABBOTTABAD..**

**APPEAL NO.603/2014**

AURANG ZEB.....Appellant

**VERSUS**

DY: DIRECTOR ESTABLISHMENT & OTHERS.....Respondents

**Comments on behalf of Respondents No. 1 to 5**

**Respectfully Sheweth:-**

Comments on behalf of respondents are submitted as under:-

**PRELIMINARY OBJECTIONS:-**

1. That the appellant has no cause of action to file the instant appeal.
2. That the appellant has no locus standi.
3. That the appellant did not come to this Honorable Tribunal with clean hands.
4. That the appellant concealed and distorted the material facts from this Honorable Tribunal.
5. That the present appeal has been filed just to pressurize and blackmail the respondents.
6. That the instant appeal is not maintainable in its present form.
7. That the instant appeal is hopelessly time barred.

**Factual objections:-**

1. That para No. 1, of the instant appeal relates to the service record of appellant.
2. That para No. 2, of the instant appeal is incorrect hence, denied as per inquiry report in 1984 school was shifted to newly Government building. Copies of the inquiry reports are annexed as annexure "A", & "B" respectively.
3. That para No. 3, of the instant appeal is correct.
4. That para No.4, of the instant appeal is incorrect hence, denied. As per inquiry report the building of the school was damaged due to flood & strength gradually reduced & in year 2005 the building was totally

damaged due to earthquake & the school was shifted to Toap by the order of then Deputy DEO. After few days then Head Teacher Mr. Muhammad Daud shifted the school to the Mosque on his own will. Furthermore, appellant shifted the school to his house without consulting the concerned authority & since 26/06/2012 the school was functioning in the Mosque without any student. Copies of the inquiry reports are already annexed with comments as annexure "A", & "B".

5. That para No.5, of the instant appeal is correct to the extent that on 19/06/2012 the then ADEO Circle shifted the school to Mosque again while rest of the para as composed is incorrect.
6. That para No. 6, of the instant appeal as composed is incorrect, hence, denied.
7. That para No. 7, of the instant appeal is subject to cogent proof. Furthermore, appellant never submitted any application regarding the situation of the school and deliberately concealed the real situation from the department for his personal interest.
8. That para No. 8, of the instant appeal is incorrect, hence, denied.
9. That para No. 9, of the instant appeal is incorrect hence, denied as per inquiry report in respect of GPS Batta Keri (non functional school) submitted by Sub Divisional Education Officer (Male) Abbottabad, vide letter No. 2551 dated 30.10.2012 & No. 2822 dated 29.11.2012, appellant have been found absent from duty w.e.f 01.08.2010 to 31.07.2012, copies of the letters are annexed as annexure "C", & "D".
10. That para No. 10, of the instant appeal as composed is incorrect hence, denied. Appellant himself admitted in his written reply that inquiry officer recorded the statements of the two local persons.
11. That para No. 11 of the instant appeal is incorrect, hence, denied. Complete & comprehensive reply has already been given in above para No.9 of the factual objections.
12. That appellant is wasting the precious time this Honorable Tribunal as instant appeal is meritless.

**GROUND:-**

- a. In reply to ground No a, it is stated that all the allegations which were levelled against the appellant were proved through the inquiry reports.
- b. As per report of ADO Circle only two (02) students were present in the school without having books & copies.
- c. That ground c, as composed is incorrect hence, denied. Furthermore, appellant never submitted any application regarding the situation of the school and deliberately concealed the real situation from the department for his personal interest.
- d. That ground d, as composed is incorrect hence, denied. Furthermore, all the allegations which were levelled against the appellant were proved through the inquiry reports.
- e. That ground e, as composed is incorrect hence, denied.
- f. That respondents seeks permission of this Hon: Tribunal to advance further grounds during arguments.

It is, therefore, very humbly prayed that in the light of forgoing comments the appeal in hand may graciously be dismissed with cost throughout.

Sub Divisional Education Officer (M)

Abbottabad.

(Respondent No. 5)

District Education Officer (M)

Abbottabad.

(Respondent No. 4)

Dy. Director (Establishment)

E & SE, KPK, Peshawar.

(Respondent No. 1)

Director (E & SE)

E & SE, KPK, Peshawar.

(Respondent No. 3)

Secretary (E & SE) KPK,

Peshawar.

(Respondent No. 2)

*Vetted  
Subject to Affixation  
of Affidavit & record*

*M. L. en  
GP ST AD  
8/9/15*

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR AT CAMP COURT ABBOTTABAD..**

**APPEAL No.603/2014**

**AURANG ZEB.....Appellant**

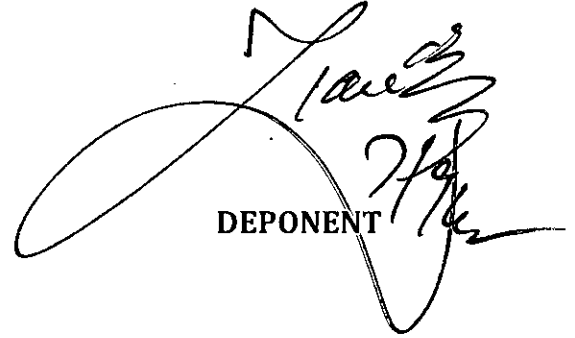
**VERSUS**

**DY: DIRECTOR ESTABLISHMENT & OTHERS.....Respondents**

**Comments on behalf of Respondents No. 1 to 5**

**AFFIDAVIT**

I, Mr. Zia ud Din, District Education Officer (M) Abbottabad, declare on oath that the contents of forgoing Comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

  
DEPONENT

(5)

Annex (A)

(24)

(278)

### INQUIRY REPORT

Annex A

5

02. Caption of Inquiry

Govt Primary School Batta Kari Katabagh

03. Date of Inquiry

02/08/2012

04. Inquiry Officer

Nisar Ahmed Principal GHS Mir Pur Abbottabad

05. Brief History of the case

GPS Bata Kari is situated near Barmi Gali Bazar Kala bagh U/C Nagri Bala NA 18 & P# 48 district Abbottabad. The school was established on 10<sup>th</sup> April 1972 in a room of locality Mosque.

After some time the school was shifted to near private building. In 1984 the school was shifted to newly Govt Building. The school was smooth functioning with 50 -60 students up to 1992. In 1992, the Building of the school was damaged due to flood and the strength of the students gradually reduced. Due to the earthquake 2005, the school building was totally damaged, so vide Mr Zaffar Pervez ex DEO(primary) the school was shifted to Hoap. After few days Mr Mohammed Daud PST( ex head teacher) shifted the said school to the mosque on his own will. Mr Gul Faraz (ex head Teacher retired) shifted the school in his house on his own will. Mr sharafat Khan (Present ADO Circle) on 19/5/2012 shifted the school to mosque again. From 26/6/2012 to up till now, the school is functioning in a mosque without any student, but one PST & one Chowkidar are working. The building of the school is under construction from a long time.

*Invested*  
*22/4/14*  
 Assistant District Officer  
 (E & S) Education  
 Abbottabad

06. Reference/T.O.P.s

EDO (E & S) Abbottabad vide letter Endst No, 12756/ES-iv/visit Abbottabad, dated 17/7/2012, appointed the undersigned as inquiry officer regarding the,

- Building of the GHOST SCHOOL ✓
- Students attendance/strength ✓
- Teachers attendance ✓
- Class iv attendance ✓

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Procedure

As Inquiry officer,

Visited GPS Batta Kari on 02/8/2012, got written

- 1- statements of local persons, (Annexure A1 & A11)
- 2- Ex-Head Teacher Mr Gul faraz & Aurangzeb (Annexure B1, II)
- 3- Present H/Teacher Mr Mohammad Alyas (Annexure C)
- 4- ADO Circle Mr Sharafat Khan (Annexure D)
- 5- Collect data from EMIS section. (Annexure E)
- 6- AWR at EDO (E & S) at Abbottabad office (Annexure G)
- 7- Teachers/ Att Register at EDO (E & S) office (Annexure H)
- 8- Students/ Att Register at EDO (E & S) office (Annexure I)

*Arrested*  
*Am*  
*22/9/14*

Assistant District Officer  
 (E & S) Education  
 Abbottabad

BUILDING

GPS Bata Kari was functioning in a mosque and then in private building from 1972 to 1983.

In 1984, it is shifted to its newly built Govt building. Here, it was functioning till 2005. after the earthquake 2005, the building was damaged and the school was shifted to the place (Toap) by the order of DDO of that time.

According to EMIS record, the 2 kanals land is of the Govt property, where the school is situated.

The two rooms building of the school is under construction for a long time.

Students Strengths-

Vide written statements of the teachers and ADO circle, 362 students are confirmed to on roll from 1972 to 2012 (40 years).

On 06/6/2011, vide ADO circle, the attendance was as under,  
 Zero KG 1<sup>st</sup> 2<sup>nd</sup> 3<sup>rd</sup> 4<sup>th</sup> 5<sup>th</sup>  
 03 02 Nil Nil Nil Nil Nil Total 05

Vide EMIS record of recent three years  
 2009 Zero KG 1<sup>st</sup> 2<sup>nd</sup> 3<sup>rd</sup> 4<sup>th</sup> 5<sup>th</sup>  
 07 08 01 03 01 nil nil Total 20

2010 Zero KG 1<sup>st</sup> 2<sup>nd</sup> 3<sup>rd</sup> 4<sup>th</sup> 5<sup>th</sup>  
 nil 10 02 01 01 04 nil Total 18

2011 Zero KG 1<sup>st</sup> 2<sup>nd</sup> 3<sup>rd</sup> 4<sup>th</sup> 5<sup>th</sup>  
 05 08 08 nil nil nil nil Total 21

Students strength didn't match in different available records, entered by same teacher. The perusal of the AWR confirms that the same was factiously maintained and apparently bearing the tampered signature of Ex ADOs circle.  
 Log Book, Stock register of school and PTC funds record are still lying in custody of Gulfraz PST, didn't provide on demand.

07 Findings

2



Assistant District Officer  
(E & S) Education  
Abbottabad

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(26)

Two PST posts and one class iv post in this school. On the visit of present DO Edu on 13/06/2012, Mr. Aurangzeb PST was transferred to GPS Nari Kari. Mr. Aurangzeb PST was transferred from Nari Kari to this school, he took over the charge on 26/06/2012. He admitted that no student came to school in his period. The school record is in EDO Office Abbottabad. Mr Gul Faraz PST was on Medical leave, and retired on 31<sup>st</sup> July 2012. Mr Khursheed is on class iv post since 01/10/1989. He admitted that there is no student in the school since last six months. Presently the School is running with one PST Mr. Mohammed Ilyas and a class iv Mr khursheed.

### ADO Circle Remarks

Present ADO circle Mr Sharafat Khan after taking over the charge visited this school on 06/6/2011 and submitted the report with proposal to Dy DO(P) Atd about the bad condition of the school.

He also informed the officer concern time and again, that the people's of the locality demanded the transfer of both teachers, Mr Gul Faraz & Aurangzeb from GPS Bata Kari. Both teachers are responsible for nil attendance of the students in the school.

The above mentioned facts confirm that the report of DO Edu (E & S) is based on reality.

The school is non functional (GHOST SCHOOL) after the earthquake October 2005.

Teachers, Cluster Head, ADO circle & Dy DO Primary of prescribed time period are responsible to this great loss.

After the flood 1992, the teachers didn't take keen interest for the betterment of the school.

Now they are the agents of private schools of some religious groups. Present PST teacher (Mohammad Ilyas) is a master trainer of DAWA Schools system. He is a neighbor of the mosque, where the school is functioning now a days, he couldn't improve the attendance of the students so far.

Parents prefer to admit their kids in private institutions.

### Recommendations

There are several Govt & Private Primary Schools in the locality and there is no need of this school.

1-Vide the report of present ADO Circle, the school should be shifted to nearest GPS Nari Kari.

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17

*A. Ahmad*  
*A. Ahmad*  
*22/4/14*

Assistant District Officer  
(E & S) Education  
Abbottabad

2- Present staff should be transferred to the needy schools.

3- The pay of the staff should be stopped immediately till the decision of future of school and pay already got for last 24 months be recover from  
I) Gul fraz PST  
II) Aurang zaib PST

4- After the audit, pay of the staff, PTC funds & other funds should be recovered by the staff on the school record before 26/6/2012 & deposited in Govt treasury as soon as possible.

5- All the responsible officers should be punished according to the rules.

6- Log Book, Stock register of school and PTC funds records are still lying in custody of Gulfraz PST which need to be recovered.

7- As responsibility also lies on Gulfraz PST so his pension case should not be moved to higher Offices till the clearance of matter.

*Nisar Ahmed*  
NISAR AHMED

Inquiry officer

Principal GHS Mir Pur Abbottabad

NO. 93 Dated 06/8/2012

Copy to

1- EDO (E & S) Abbottabad vide his letter No, Endst No, 12756/EB iv /visit GPS Bata Kari dated 17/7/2012

*Nisar Ahmed*  
NISAR AHMED

Inquiry officer

4

Annex-("B")

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(21) 20

Annexure: A

To letter no. 160 dated 25 August 2012

**INQUIRY REPORT**

**GPS BATA KERI-ABBOTTABAD AS NON FUNCTIONAL SCHOOL**

Annex B 9

01	Caption of inquiry	Govt Primary School Batta Keri Abbottabad
02	Reference	EDO office letter no. 13989/EB-IV/Visit dated 07-08-2012.
03	Date of inquiry	13-08-2012 ✓
04	Inquiry Officer	Khurshid Ahmed Principal GHS Banda Pir Khan-Abbottabad
05	Brief History of the case	<p>GPS Batta Keri is situated near Barmi Gali Bazar, Kala Bagh, U/Nagri Bala, NA-18 and PF- 48 district Abbttabad. The school was established in a room of local mosque in 1972. After some time the school was shifted to a private building. In 1984 the school was shifted to newly constructed Govt Building. Record (AWR) shows that total <u>207 students</u> were enrolled in 21 years including <u>19 re-admitted cases from 1972 to 1992.</u> In 1992 the building of the school was damaged due to flood and the strength gradually reduced. In 2005 the building was totally damaged due to earthquake and the school was shifted to Toap by the order of Deputy DO of that time. After few days the head teacher Mr. Muhammad Daud shifted the school to the mosque again on his own will. Mr. Gul Fraz (Ex Head teacher-now applied for retirement) shifted the school to his house without consulting the authority concerned. Mr. Sharafat Khan (present ADO) shifted the school to the same mosque again on 19-06-2012. ✓</p> <p>From 26-06-2012 the school is functioning in the mosque <b>without an student</b>. One PST and a Chowkidar are still working there. The building is under construction for a long time (work stopped) but could not be completed so far by the ERRA.</p>
06	Procedure	<p>As an inquiry officer the undersigned visited the school on 13 August 2012 and collected the data as shown below:-</p> <ul style="list-style-type: none"> <li>a. Statement of Ex Head Teacher Mr. Gul Fraz, PST -A ✓</li> <li>b. Statement of Ex Teacher Mr. Aurangzeb, PST -B ✓</li> <li>c. Statement of Mr. Muhammad Ilyas(present H/T) -C ✓</li> <li>d. Statement of Mr. Sharafat Khan, ADO Circle -D ✓</li> <li>e. AWR collected from EDO(E&amp;SE) Office, Atri -E ✓</li> <li>f. Teachers &amp; Students Attendance Registers collected from EDO(E&amp;SE) Office -F ✓</li> <li>g. Three statements of local persons -G&amp;H ✓</li> </ul>

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 22/4/12

*Stamp:*  
 Assistant District Officer  
 (E & S) Education  
 Abbottabad

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07 Findings

- a. According to the EMIS record, 02 kanal land is of the govt property where is the school is being reconstructed.
- b. Strength of classes in EMIS data and AWR don't match.
- c. Year wise strength of the school according to AWR is as under:-

Year	Str	Year	Str	Year	Str	Year	Str
1972	34	1983	07	1994	05	2005	05
1973	14	1984	05	1995	05	2006	07
1974	07	1985	06	1996	05	2007	06
1975	12	1986	12	1997	05	2008	07
1976	12	1987	01	1998	15	2009	04
1977	07	1988	16	1999	20	2010	04
1978	05	1989	12	2000	Nil	2011	11
1979	07	1990	08	2001	19	2012	*03
1980	12	1991	05	2002	11	-	-
1981	11	1992	08	2003	01	-	-
1982	06	1993	12	2004	20	-	-

*A. U. Ester*  
*22/4/14*

*Assistant District Officer  
 E & S Education  
 Abbottabad*

\*Note: 03 students were shown only on AWR whereas head teacher could not produce them physically.

- d. Perusal of AWR confirms that the same was factiously maintained with tampered signatures of ex ADO(s).
- e. Log Book, Stock Register and PTC Fund record is still lying in the custody of ex head teacher Mr. Gul Fraz, PST. He didn't provide on demand.
- f. Staff: There were two PST posts and a Chowkidar post in the school. DO (E&SE), on his visit to the said school, has transferred Mr. Aurangzeb to GPS Nari Keri and Mr. Ilyas, PST has been adjusted in his place from GPS Nari Keri to this school keeping in view the worst condition of the school.
- g. The teachers of the school were drawing pay since long without improving condition of the school.
- h. Inquiry report by DO (E &SE) vide letter no 11596-601 dated 18-06-2012 is based on facts.

08 Recommendations

- a. As Mr. Gul Fraz, PST has recently applied for pension without providing record of the school so his pension case must not be forwarded to higher authority without clearance.
- b. As almost all students have been admitted to private schools (approachable) by the parents so there is no need of this school in near future. And hence the school should be shifted to the nearest GPS Nari Keri or Giris Primary school of the same village i.e Bata Keri.
- c. All the teachers/staff of GPS Bata Keri must be transferred to some other needy schools.
- d. It is also the negligence of concerned ADO(s) and Deputy DO(s)

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who took it light and threw the school into disarray. Necessary action should be taken against them according to rules. Pay of the current academic year (April 2012 onward), PTC funds, and other funds must be recovered from the said teachers and pay hence forth should be stopped immediately till decision of future of the school.

- f. Log book, stock register and PTC files are still in the custody of Gul Fraz, PST which needs to be recovered.
- g. Department should also take keen interest for the completion of all such schools which are under construction because no school can function better without proper building.

*Attestd*  
*22/8/12*

*[Signature]*  
KHURSHID AHMED  
(INQUIRY OFFICER)

PRINCIPAL GHS BANDA PIR KHAN- ABBOTTBAD

No. 160 dated 25 August 2012

(Page # 01 to 03)

Assistant District Officer  
(E & S) Education  
Abbottabad

*لو*  
*عبد جبار*  
*25/8/12*

(3)

(12)

Ann - (C)

49

OFFICE OF THE DEPUTY DISTRICT OFFICER (MALE) PRIMARY ABBOTTABAD.

NO 2551 /

DATED A-ABAD THE 30 / 10 / 2012.

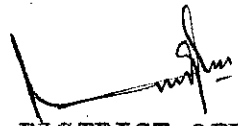
To

The Executive District Officer  
Ele: & Sec: Edu: Abbottabad.

Subject :- ENQUIRY REPORT NON FUNCTIONAL SCHOOL.

Memo :-

Enclosed please find herewith enquiry report of GPS Bata Keri is put up for further necessary action please.



DY: DISTRICT OFFICER (MALE)  
PRIMARY ABBOTTABAD.

(13)

Ann - ("D") ("D")

(PB)

OFFICE OF THE DEPUTY DISTRICT OFFICER (MALE) PRIMARY ABBOTTABAD.

NO 2222 /

DATED A-ABAD THE 29/11/2012.

To

The Executive District Officer  
Ele: & Sec: Edu: Abbottabad.

Subject :- APPLICATION FOR WITHDRAWAL OF RETIREMENT CASE IN R/O MR: GUL FARAZ (P.S.T) G.P.S BATTI KARI.

Memo :-  
Enclosed find herewith an original self explanatory application of Mr: Gul Faraz (PST) G.P.S Batta Kari whose retirement case has already been submitted Vide this office letter No. 2749 Dated 20-11-2012.

It is further stated that the teacher concerned remained absent from his duties w.e.from 01-08-2010 to 31-07-2012 as per *reports* Enquiry Officer, Principal GHS Mirpur and Principal GHS Banda Pir Khan (Photo copies of enquiry reports are attached). His recovery amount calculated for the absent period is Rs: 527647/- (Copy attached)

Hence case is submitted for your kind perusal and further necessary action please. If agreed Mr. Gul Fraz may be adjusted at GPS Jhangra Tajwa against V/Post.

DO(M)

11431  
1-12-12

*[Signature]*  
BY: DISTRICT OFFICER (MALE)  
PRIMARY ABBOTTABAD.

*Pl: take further  
ya accordingly  
[Signature] 29/11/12*