


Form- A

## FORM OF ORDER SHEET

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

Case No.- 1216/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/08/2022	<p>The appeal of Bibi Asma presented today by Mr. Abdur Rehman Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12-08-2022 .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

SCANNED  
KPST  
Peshawar

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

**S.A.No...../2022**

BIBI ASMA

**VERSUS**

Government of Khyber Pakhtunkhwa, through Chief Secretary and  
Others

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Dated: 10/08/2022

*Bibi Asma*  
Appellant

Through

*RAJ*  
*Ampln*  
**ABDUR RAHMAN MOHMAND**  
**ADVOCATE HIGH COURT**  
**PESHAWAR.**

**Off Add: Mohmanil Law Chamber near Charsadda Adda**  
**Peshawar. 03005991598**

①

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

**S.A.No...../2022**

BIBI ASMA D/O MEHER MUHAMMAD R/O MADINA  
COLONY NAWO DEH POST OFFICE TORO TEHSIL AND  
DISTRICT MARDAN.

----- *Appellant.*

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.
2. Secretary Education, Government of Khyber Pakhtunkhwa, Peshawar.
3. Director General Commerce Education & Management Science, Khyber Pakhtunkhwa, Peshawar.
4. Principal Govt. College of Commerce for women Mardan.
5. Manager, District Employment Exchange, Mardan.
6. Senior Auditor (IV) Anti- Corruption Establishment Khyber Pakhtunkhwa Peshawar.-----RESPONDENTS

---

**Appeal U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the impugned Office Order No. GCC(W)/MRD/1192(1-5) Dated 12.04.2022 of the Office of the Principal Govt. College of Commerce for women Mardan, whereby the Appellant was dismissed from service and departmental appeal dated 20.04.2022 of the appellant was not considered.**

.....

**Respectfully Sheweth:**

1. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable family of district Mardan. (Copy of CNIC is annexure "A").
2. That the appellant is qualified up to Master of Arts in Islamiyat (M.A. Islamiyat) and has also got her Primary Teaching Certificate (PTC) from Allama Iqbal open University Islamabad. (Copies of credentials/ degree is annexure "A-1 to A-10").
3. That the appellant has got her Diploma in Information Technology from Govt. of Khyber Pakhtunkhwa, Khyber Pakhtunkhwa Trade Testing Board Peshawar. (Copy of diploma in Information Technology is annexure "B").
4. That the appellant was registered at the Employment Exchange Mardan on dated 26.11.2018 as essential personnel and her registration number is EP/TS/223/2018, which was issued by respondent No.5. **(Copy of Employment Exchange Mardan registration number EP/TS/223/2018 issued by respondent No.5 is annexure "C")**.
5. That after going through mandatorily required criteria, and after being envisaged with the ordeals and inquisition of selection process, the Appellant was appointed as **Cook** in BPS-03 plus usual allowances as admissible under the rules and posted at Government College of Commerce for Women, Mardan, through Endst. No.GCC/W/MRD/CLASS-IV/659(1-5) dated 20.12.2018 by Respondent No.4. (Copy of appointment letter Endst. No.GCC/W/MRD/CLASS-IV/659(1-5) dated 20.12.2018 is annexure "D").
6. That thereafter the appellant submitted her arrival report on dated 24.12.2018 to the respondent No.4. and after conduction of her medical, her medical certificate was issued to her. (Copy of Arrival Report dated 24.12.2018 is

annexure "E" while copy of office order dated 24.12.2018 of respondent No.4 regarding Appellant arrival report is annexure "F" and medical certificate is annexure "G").

7. That thereafter the Appellant took charge & with her most sincere and pragmatic way, performed her duties with full zest and devotion & never left any stone unturned in performance of her duties and has always won felicitations and appreciations of her High-up at certain junctures due to her Mantle whetted skills, punctuality and behavior.
8. That before parting with the facts of the instant case and to make and vesicate out a case for the Appellant, it would equally be important to mention here that the present principal Respondent No.4 has compelled the Appellant by performing the duties of sweeper and bearer forcefully.
9. That respondent No.4 has stared personal grudges with the appellant and issued an explanation letter No.GCCW/(MRD)/2021/9281 dated 09.05.2021. (Copy of explanation letter No.GCCW/(MRD)/2021/9281 dated 09.05.2021 is annexure "H").
10. That on dated 09.06.2021 the appellant replied to the explanation letter wherein she mentioned in detail that due to Corona Vaccination she got some diseases and was on leave for two days.(Copy of reply dated 09.06.2021 is annexure "I" copy of Vaccination card is annexure "J" while copy of Doctor medical report is annexure "K").
11. That due to personal acrimony, respondent No.4 again issued an explanation letter No.942 dated 06.08.2021, but on same day dated 06.08.2021, the appellant submitted her reply along with attendance sheet. (Copy of explanation letter No.942 dated 06.08.2021 is annexure "L", reply is annexure "M" while attendance sheet is annexure "N").
12. That the respondent No.4 continued her personal animosity and on dated 22.10.2021 another explanation

letter No.GCC/(W)/2021/975 was issued wherein respondent No.4 blamed the appellant for threatening her in the office during performing of her official duty, but the same was again explained/replied by the appellant.(Copy of explanation letter No.GCC/(W)/2021/975 dated 22.10.2021 is annexure "O" while reply is annexure "P").

13. That on the direction of Respondent No.4 one Mst. Rukhsana Begum filed a complaint in the office of Director Anti-Corruption Khyber Pakhtunkhwa Peshawar dated 11.11.2021 and another application to respondent No.4 on dated 12.11.2021 against the appellant wherein they have challenged the appointment of the appellant after a lapse of more than 03 years.(Copy of complaint to Director Anti-Corruption dated 11.11.2021 is annexure "Q" while copy of application to respondent no.4 dated 12.11.2021 is annexure "R").
14. That on the complaint of Mst. Rukhsana Begum, the Superintendent for Deputy Commissioner, Mardan issued a letter No.1786/DC(M)/EA-32 dated 19.11.2021 to Respondent No.4 for further necessary action against Appellant.(Copy of letter No.1786/DC(M)/EA-32 dated 19.11.2021 of Superintendent for Deputy Commissioner, Mardan is annexure "S").
15. That from January 2022, salary of the appellant was discontinued through a letter No.Nil dated Nil by the Respondent No.4 without any cogent reason. It is pertinent to mention here that appellant performed her duties with full devotion and zest. (Copy of the Salary Discontinuation letter No.Nil dated Nil is annexure "T" while reply to the letter is annexure "T/1").
16. That an illegal Audit Report No.278-82/ACE/dated 24.03.2022 was prepared by respondent No.6, where in the conclusion paras Respondent No.6 arrived to the conclusion that Mst. Bibi Asma was appointed as Cook in BPS-03 but her name was not included in the list provided by the office

(5)

of Manager Employment Exchange Mardan.(Copy of the Audit Report No.278-82/ACE/dated 24.03.2022 of Respondent No.6 is annexure "U").

17. That an enquiry was conducted who was assigned two task .1. Appointment of Appellant. 2. Harassment part of the case. This enquiry was conducted in the absence of the appellant and no chance of personal hearing was provided to the appellant, at the end the enquiry committee concluded that the name of the Appellant was not among the registered candidates provided by Respondent No.5. (Copy of enquiry report of the committee is annexure "V")
18. That during performing of her duties, on dated 26.03.2022, through letter No.GCC/(W)/2022/1176, a show cause notice was suddenly issued by Respondent No.4 and some charges were mentioned by respondent No.4 in that show cause notice and has tentatively decided to imposed major penalty of "Dismissal from service" upon appellant. (Copy of Show cause Notice along with charges are annexure "W" & "W/1")
19. That on dated 02.04.2022, the appellant submitted her reply to the show cause notice wherein she rejected the allegations level against her in the show cause notice. It is pertinent to mention here that Respondent No.4 has some relation and sympathy with one Mst. Rukhsana Begum, who applied for bearer Post but was not selected in the year 2018. (Copy of the reply to show cause notice dated 02.04.2022 is annexure "X")
20. That without conducting any departmental enquiry against the letter No.GCC/(W)/2022/1176 dated 26.03.2022, and without providing any chance of personal hearing the Appellant was straight away dismissed from her service vide impugned Office Order No: GCC(W)/MRD/1192(1-5) dated: 12.04.2022 in a classical, cursory and whimsical manner. **(Copy of impugned dismissal Office Order No: GCC(W)/MRD/1192(1-5)**



dated: 12.04.2022 of Respondent No.4 is Annexure "Y").

21. That feeling aggrieved from impugned Dismissal from Service Order, the Appellant preferred a Departmental Appeal dated 20.04.2022 to the Deputy Director as well as the Principal Govt. College of commerce for Women Mardan (Respondent No.4) which was received on dated 23.04.2022 but the same was not considered. **(Copy of Departmental Appeal dated 20/04/2022 is annexure "Z" while receiving is annexure "Z/1")**

22. That feeling aggrieved from the impugned Dismissal Order and impugned Appellate Order the Appellant approaches this Hon'able Tribunal for his reinstatement into service with all back benefits upon the following grounds, inter-alia:

**GROUND:**

- A. That the impugned dismissal order is wrong, illegal, unlawful, void hence the same is liable to be set aside.
- B. That the act of the respondents in so called circumstances is purely baseless, unlawful, void ab-initio, coram non iudice and is not warranted by the law.
- C. That no fair Departmental inquiry against the Appellant was ever conducted, nor any inquiry dispensation order was ever passed & nor was given any opportunity to be heard, to defend, clear her position hence was deprived of her right to be heard, which is against the principles of natural justice.
- D. That neither the Appellant was ever served with any Show Cause Notice, nor was ever issued any Final Show Cause Notice & thus mandatory instruments are glaringly missing, which renders the impugned order as illegal & void.

- E. That the Appellant has thoroughly been condemned unheard which under the law is not allowed.
- F. That no opportunity of cross examining any witness was ever extended to the Appellant, hence main ingredients are missing in case of the Appellant.
- G. That the impugned dismissal order is unlawful, illegal and liable to be cancelled because the Respondent utterly violated the service law, rules, regulations and policy of the Government for Civil servants while passing the impugned dismissal order.
- H. That the impugned dismissal order is the violation of the fundamental rights of the Appellant which is guaranteed and protected by the constitution of Islamic Republic of Pakistan 1973.
- I. That under the mandate of Article 4 of the Constitution, no one should be treated otherwise than in an accordance with law, wherein Article 25 postulates that alike are to be treated alike, but here a different discriminative approach has been used to treat the Appellant.
- J. That discrimination in any form is highly abominable and bete-noire and is always checked down in derisorous manner by the Superior Courts of the land. Reason behind checking it down and chucking it away is to ensure equality and equal treatment of its citizens and to remove any sense of discrimination.
- K. That the law and law courts of the land have always preferred and encouraged that rules and policies are to be followed and have always discouraged, deplored, and depreciated any variation from the rules or policies.
- L. That where an action is taken on the complaint of such person who applied for Bearer Post after lapse of three

years and without providing a chance of personal hearing to the appellant and not conducting the same departmental proceedings, then how and from where the Appellant has been penalized with the major penalty?

M. That from every angle the impugned dismissal Order is null and void and not sustainable hence is liable to be set aside.

N. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

*It is, therefore, most humbly prayed that on acceptance of the instant Service Appeal, the impugned dismissal Office Order No. GCC(W)/MRD/1192(1-5) Dated 12.04.2022 of the Office of the Principal Govt. College of Commerce for women Mardan, whereby the Appellant was dismissed from service, may very graciously be set aside and by doing so the Appellant may very graciously be reinstated into service with all back benefits and the enquiry conducted by Respondent No.6 may kindly be declared null and void and also be quashed.*

*Any other relief not specifically asked for may also graciously be extended in favor of the Appellant in the circumstances of the case.*

Dated:10/08/2022

*Bibi Asme*  
Appellant

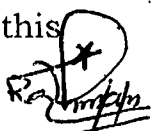
Through



**ABDUR RAHMAN MOHMAND**  
Advocate High Court Peshawar

**NOTE:-**

No such like appeal has earlier been filed by me before this Hon'able Tribunal, prior to this one.



Advocate.

9

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

**S.A.No...../2022**

**BIBI ASMA**

**VERSUS**

**Government of Khyber Pakhtunkhwa, through Chief Secretary  
and Others**

**AFFIDAVIT:**

I, Bibi Asma D/O Meher Muhammad R/O Madina Colony Nawo  
Deh Post Office Toro Tehsil And District Mardan., do hereby  
solemnly affirm and declare on oath that the contents of the  
instant appeal are true and correct to the best of my knowledge  
and belief and that nothing has been concealed or kept secret  
from this Hon'able court.



**Identified By Advocate**

**ABDUR RAHMAN MOHMAND  
ADVOCATE HIGH COURT, PESHAWAR.**

*Bibi Asma*

**DEPONENT**



10

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

**S.A.No...../2022**

BIBI ASMA

**VERSUS**

Government of Khyber Pakhtunkhwa, through Chief Secretary and  
Others

**ADDRESSES OF PARTIES**

**APPELLANT.**

BIBI ASMA D/O MEHER MUHAMMAD R/O MADINA COLONY  
NAWO DEH POST OFFICE TORO TEHSIL AND DISTRICT  
MARDAN.

**RESPONDENTS:**

1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.
2. Secretary Education, Government of Khyber Pakhtunkhwa, Peshawar.
3. Director General Commerce Education & Management Science, Khyber Pakhtunkhwa, Peshawar.
4. Principal Govt. College of Commerce for women Mardan.
5. Manager, District Employment Exchange, Mardan.
6. Senior Auditor (IV) Anti- Corruption Establishment Khyber Pakhtunkhwa Peshawar.

Dated: 10/08/2022

*Bibi Asma*

Appellant

Through

*RAHMAN MOHMAND*

**ABDUR RAHMAN MOHMAND  
Advocate High Court Peshawar**

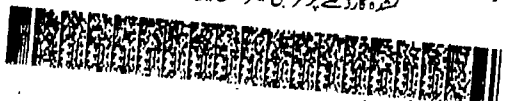


شناختی نمبر: 16101-0490466-8  
 خاندان نمبر: SV8T9C  
 موجودہ پتہ: مدرسہ کالونی، ٹونو، ڈاکخانہ طور، تحصیل ونگل، مہمان



12984880418  
 شناختی نمبر  
 منتقل پتہ: ایضاً

تاریخ اجراء: 11/02/2014  
 تاریخ ترمیم: 11/02/2024  
 کمرہ کارڈ کے برقریبی لیٹرنگس میں ڈال دیں



ATTESTED



Annex - "A" (11)  
 حکومت پاکستان

ذاتی شناختی کارڈ  
 16101-0490466-8



نام:   
 جنس:   
 پتہ:   
 شناختی علامت:   
 تاریخ پیدائش: 01/01/1984

امینہ تاجور  
 دستخط مشورہ نیشنل

دستخط حامل کارڈ


ATTESTED

(12)

Annex - A/1

SNO: 18212

Roll No: 37

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION MARDAN**  
  
**MARDAN N.W.F.P. PAKISTAN**  
**PROVISIONAL CERTIFICATE**  
**SECONDARY SCHOOL CERTIFICATE EXAMINATION**  
**SESSION 2002 ANNUAL/SUPPLEMENTARY**  
Science Group

THIS IS TO CERTIFY THAT BIBI Asma  
 Son/Daughter of Mehar Muhammad  
 and a candidate of Mardan

has passed the Secondary School Certificate Examination of the  
 Board of Intermediate and Secondary Education, Mardan held in Oct 2002  
 as a Regular/Private candidate. He/She obtained 480 marks out of 850 and has  
 been placed in Grade ( C ) Representing Good

The Candidate passed in the following subjects.

- |                 |               |               |                     |
|-----------------|---------------|---------------|---------------------|
| 1. English      | 2. Urdu       | 3. Islamiyat. | 4. Pakistan Studies |
| 5. <u>Maths</u> | 6. <u>PHY</u> | 7. <u>Ch</u>  | 8. <u>Bio</u>       |

Internal assessment Grade by the institution concerned is (    )

Date of birth according to admission form is 1.1.84

One thousand nine hundred and 154 - Jan - Eighty four

Prepared by A

Checked by J

Date of Preparation 3/7/2003

D. Mac  
 Asstt. Secretary (Certificates)

P  
**ATTESTED**

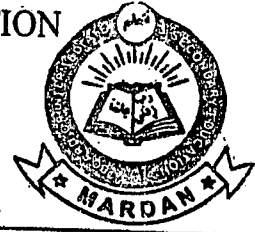
(13)

Annex-A/2

BOARD OF INTERMEDIATE & SECONDARY EDUCATION  
MARDAN

DETAILED MARKS CERTIFICATE  
SECONDARY SCHOOL CERTIFICATE EXAMINATION  
(SCIENCE GROUP)

SESSION 2002 ANNUAL/SUPPLEMENTARY



S. No. MBS 00037

Name Bibi Asma

Father's Name Mehar Muhammad Roll No. 37

Subjects	Total Number of Marks Alloted	Marks Obtained			
		Theory	Practical	In Figures	In Words
1. English	150			81	
2. Urdu	150			97	
3. Islamiyat	75			41	
4. Pakistan Studies	75			41	
5. Mathematics	100			35	
6. Physics	100			50	
7. Chemistry	100			45	
3. Biology	100			46	
<b>Total</b>	<b>850</b>			<b>430-D</b>	

Errors and omissions excepted.

Total Marks in Words Four hundred & Thirty

Prepared by \_\_\_\_\_

Checked by \_\_\_\_\_

Date of Preparation 12 JAN 2003

Controller of Examinations  
Board of Intermediate & Secondary Education  
MARDAN

ATTESTED



A/13

S.No. 086248

Roll No. 49175

Group: Humanities



# Board of Intermediate and Secondary Education Mardan N.W.F.P. Pakistan INTERMEDIATE EXAMINATION

14

SESSION 2009 - ANNUAL

*This is to certify that* BIBI ASMA *Daughter of* MEHER MUHAMMAD

*and resident of* District Mardan *Registration No.* 843-B/MP-2007 *has passed the Intermediate*

*Examination of the Board of Intermediate & Secondary Education, Mardan held in* May/June, 2009

*as a* Private *Candidate. She Obtained* 476 *Marks out of 1100 and has been placed in*

*Grade* D *Representing* Fair

*Asstt. Secretary*

Asstt. Secretary

*Attested*  
ATTESTED

*Secretary*  
Secretary

This certificate is issued without alteration or erasure.

A/13

S. No. 086248

Roll No. 49175

Group. Humanities

Annex



# Board of Intermediate and Secondary Education Mardan N.W.F.P. Pakistan INTERMEDIATE EXAMINATION

114

SESSION 2009 - ANNUAL

*This is to certify that*

**BIBI ASMA**

*Daughter of*

**MEHER MUHAMMAD**

*and resident of* **District Mardan**

*Registration No.* **843-B/MP-2007**

*has passed the Intermediate*

*Examination of the Board of Intermediate & Secondary Education, Mardan held in* **May/June, 2009**

*as a* **Private** *Candidate. She Obtained* **476** *Marks out of* **1100** *and has been placed in*

*Grade* **D** *Representing* **Fair**

*Asstt. Secretary*  
**Rasool**

**Asstt. Secretary**

*Attested*  
**ATTESTED**

*Secretary*  
**Secretary**

This certificate is issued without alteration or erasure.



(15) Annx - A/

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION  
MARDAN N.W.F.P. PAKISTAN**

S.No.MB 034966

Roll No: 49175

Reg No: 843-B/MP-2007

**PROVISIONAL AND DETAILED MARKS CERTIFICATE  
INTERMEDIATE (ANNUAL) EXAMINATION - 2009  
HUMANITIES ( Part-II )**

BIBI ASMA

Son/Daughter of MEHER MUHAMMAD

of Institution/District MARDAN

has secured the marks shown against each subject in the Higher Secondary School Examination held in the month of APRIL/MAY as PRIVATE Candidate.

Subjects	Marks	Marks Obtained						
		Part-I		Part-II		Total	Marks in Words	
		Theory	Pract	Theory	Pract			
English	200	35	--	33	--	68	Sixty-Eight	
Urdu	200	43	--	35	--	78	Seventy-Eight	
Islamic Education	50	18	--	--	--	18	Eighteen	
Pakistan Studies	50	--	--	33	--	33	Thirty-Three	
Islamic History	200	44	--	45	--	89	Eighty-Nine	
Civics	200	48	--	45	--	93	Ninety-Three	
Islamic Studies	200	44	--	53	--	97	Ninety-Seven	
<b>Total</b>						<b>1100</b>	<b>476-D</b>	<b>Four Hundred Seventy-Six Only</b>
Remarks :								

Prepared by :


Checked by :

Date of Declaration of Result: 21-JUL-09

Date of Issue: 21-JUL-09

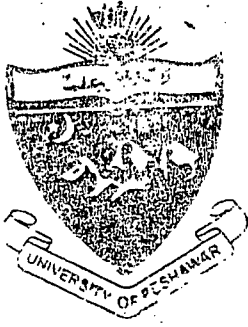
Note: Errors/Omissions are excepted: Any mistake in above particulars must be intimated within 30 days after declaration of result.

**ATTESTED**

  
Controller of Examinations  
BISE, Mardan

(16)

Annex - A/S



# University of Peshawar

Pakistan

## Detailed Marks Certificate

Bachelor of Arts.

Part-II

Supplementary Examination 2013

District Mardan



Private

Name: BIBI ASMA

Gender: Female

Roll No: 17308

Father's Name: MEHER MOHAMMAD

Registration No: 2010-PE-27702

Division: 3rd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Compulsory)	75	24	Twenty Four
Urdu	75	37	Thirty Seven
Islamic Studies	75	37	Thirty Seven
Pakistan Studies	40	23	Twenty Three
<b>Part-I</b> 5742: Supplementary-2013	<b>285</b>	<b>111</b>	<b>One Hundred and Eleven</b>
<b>Part-II</b>	<b>550</b>	<b>232</b>	<b>Two Hundred and Thirty Two</b>

ATTESTED

Errors & omissions are subject to subsequent rectification

Chances Available: 3

The Examination was taken In Parts

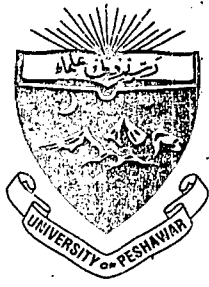
Examination held From 18-Dec-2013 to 20-Jan-2014

Result Declared on Monday, April 7, 2014

Issue Date: 14-May-2014

8:20 am

(Prof. Dr. Rashid Khan)  
CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR



# University of Peshawar Pakistan

## Detailed Marks Certificate

Master of Arts in Islamiyat

Previous

Annual Examination 2015

District Mardan



Private

Name: BIBI ASMA

Gender: Female

Roll No: 15439

Father's Name: MEHER MOHAMMAD

Registration No: 2010-PE-27702

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al-Quraan Translation Commentary-I	100	54	Fifty Four
Hadith & Principles of Hadith-II	100	48	Forty Eight
Islamic Jurisprudence-III	100	76	Seventy Six
Seerat un Nabi and History of Islam-IV	100	62	Sixty Two
Arabic Grammar and Literature-V	100	56	Fifty Six
	500	296	Two Hundred and Ninety Six

ATTESTED

Errors & omissions are subject to subsequent rectification

Chance: 1

The Examination was taken As a Whole

Examination held From 12-Aug-2015 to 15-Sep-2015

Result Declared on Tuesday, January 26, 2016

Issue Date: 27-Jan-2016

5:33 pm

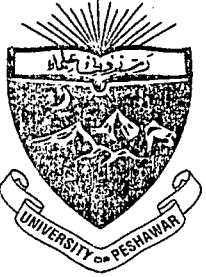
Computerized by RTC

Mardan City Area

(Prof. Dr. Rashid Khan)  
CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

Annex - A/

18



# University of Peshawar Pakistan

## Detailed Marks Certificate

Master of Arts in Islamiyat  
Final  
Annual Examination 2016  
District Mardan



Private

Name: **BIBI ASMA**

Gender: *Female*

Roll No: **24767**

Father's Name: **MEHER MOHAMMAD**

Registration No: **2010-PE-27702**

Division: **2nd**

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al Quraan Translation 2nd Half & Tafsir of Surah Nur & Ahzab-VI	100	48	Forty Eight
Usul al-Fiqh(Principles of Islamic Jurisprudence)-VII	100	70	Seventy
Comparative Study of Judaism, Christianity & Islam-VIII	100	44	Forty Four
Contemporary Muslim World(Resources & Challenges)-IX	100	54	Fifty Four
Eco System of Islam (Comparison with Modern Eco Thought)-X	100	63	Sixty Three
Viva Voce	100	55	Fifty Five
<b>Previous</b> 15439:Annual-2015	<b>500</b>	<b>296</b>	<b>Two Hundred and Ninety Six</b>
<b>Final</b>	<b>1100</b>	<b>630</b>	<b>Six Hundred and Thirty</b>

*[Signature]*

**ATTESTED**

Errors & omissions are subject to subsequent rectification

Chance: 1

**The Examination was taken As a Whole**

Examination held From 03-Aug-2016 to 19-Sep-2016

Result Declared on Tuesday, February 14, 2017

Issue Date: 16-Feb-2017

4:58 pm

*[Signature]*

(Dr. Fazal Sher)  
CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

(19) Annex - A/8  
**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**



Serial No. 209941

**PROVISIONAL RESULT CARD**

Name **BIBI ASMA**  
 Father's Name **MEHER MUHAMMAD**  
 Address **MOH IKRAMULLAH KHAN, TORU**

Roll No. **AC614657**  
 Registration No. **07NMN00215**  
 Final Semester **AUT- 2009**

Tehsil **MARDAN**  
 District **MARDAN**

has successfully completed **PRIMARY TEACHING CERTIFICATE**

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 09	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	79
SPR- 09	0614	EDUCATIONAL PSYCHOLOGY	100	65
SPR- 09	0613	PRINCIPLES OF EDUCATION	100	55
SPR- 09	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	69
AUT- 09	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	68
AUT- 09	0618	TEACHING OF MATHEMATICS	100	75
AUT- 09	0617	TEACHING OF URDU	100	56
AUT- 09	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	75
AUT- 09	0620	TEACHING OF ISLAMIC & SOCIAL STUDIES	100	60

**ATTESTED**

CREDITS: 5

Total Marks / Obtained 900 / 602

Result Declared on **SEPTEMBER 17, 2010**

Percentage / Grade 67 B

Date of issue **SEPTEMBER 29, 2010**

**Controller of Examinations**

**Disclaimer:**

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

20 Annix - A/g

Sr. No. 307052

Certificate No. K16-07052



Government of Pakistan

National Vocational & Technical Training Commission (NAVTTTC)



It is certified that Bebe Asma S/D/o Meher Mohammad

has successfully completed the certificate course of Fashion Designing & Dress Making

The course was organized by National Vocational & Technical Training Commission in collaboration with Govt. Technical & Vocational Center (Women)

at Mardan from 17-Aug-15 to 16-Feb-16

Issued at Peshawar on this 14th day of May 2016



364103240637115248



Director General, NAVTTTC

ATTESTED

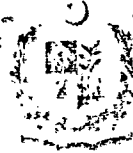


Amx - A/10

21

367300

Certificate No.



Government of Pakistan



National Vocational & Technical Training Commission (NAVTTIC)  
Prime Minister's Youth Skill Development Program Phase-IV (Batch-II)



Bibi Asma

Meher Mohammad

It is certified that

has successfully completed the certificate course of  
Beautician (Skin-Care, Hair Styling and Cutting)

in B Grade

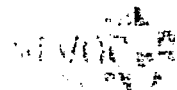
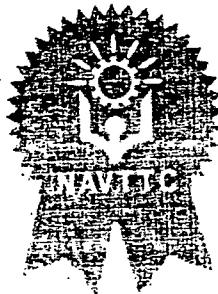
The course was organized by  
National Vocational & Technical Training Commission  
in collaboration with

Government Technical & Vocational Centre (W), Mardan

**ATTESTED**

at Mardan  
from 14-May-2018 to 16-Nov-2018

Issued at Pesahwar on this 30 day of November 2018



Director General



# KHYBER PAKHTUNKHWA TRADE TESTING BOARD

PESHAWAR PAKISTAN

Diploma in Information Technology

## Diploma



Amx - "B"

No. 23168

Session 2016-2017

Roll No. 59186

Awarded to *Mr./Miss/Mrs.* BIBI ASMA *S/D/W.O* MEHER MUHAMMAD

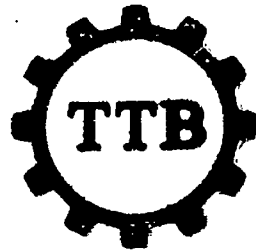
*Registration No.* IIMS/MRD/DIT/SEP/16/21 *Institute* ISLAMIC INSTITUTE OF MANAGEMENT SCIENCES, MARDAN

*has successfully completed the one year duration course titled "Diploma in Information Technology (DIT)" and passed its examination conducted by Khyber Pakhtunkhwa Trade Testing Board Peshawar* 19th September 2017

*and has obtained* 1000 *marks out of* 1400 *Grade* A *And in recognition thereof this one year Diploma in Information Technology is awarded to him/her.*

2nd *day of* May, 2018

  
Secretary



  
ATTESTED

  
Chairman

23

Annx-B/1

# DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in N.W.F.P., having belonged to it by birth/settlement.

I belong by birth to village Mohallah TOYU, Moh, Khramullah Khan  
TOYU Tehsil Mardan District Mardan

B.B. Asma  
Signature of the applicant

Date 20/3/02

Pursuance to the declaration dated 20/3/02 filed

By B.B. Asma Son/daughter of Mehrez Muhammad Domiciled  
in the N.W.F.P., it is hereby certified that the said B.B. Asma  
is born of parents who are permanent residents of the N.W.F.P., having belonged  
to it by birth/settled in it.

I have satisfied myself from personal knowledge verification that the above  
declaration is true certify..

This 21

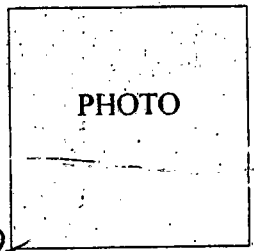
Day of MARCH 2002

[Signature]  
Name  
DEPUTY DISTRICT OFFICER  
(JUDL: / REV:)  
MARDAN/THAT BHAI

**ATTESTED**

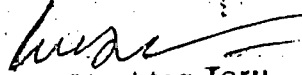
COUNTERSIGNED

[Signature]  
DISTRICT OFFICER  
(REVENUE & ESTATE)  
MARDAN



No. 17592 Date 22.3.02

Certified That M<sup>ST</sup>. Bibi Asma  
D/o Meher Muhammad is personally  
known to me and her parents are the  
permanent Residents of Mohallah,  
Karamullahi Khan, village Toru Khan,  
District and Tehsil Mardan.

  
Engr. Mushtaq Toru  
General Councillor  
Union Council # 24  
Toru (Mardan)

24

Annex - "C"

GSAPD.KPK.1851/6-Emp.Exchange-6000 Cards-4.5.2016-Introduction Card Emp. Exchange

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
TECHNICAL EDUCATION & VOCATIONAL AUTHORITY, KP-TEVTA  
EMPLOYMENT EXCHANGE  
ESSENTIAL PERSONNEL REGISTRATION CERTIFICATE  
(Vide Section 5 (I) of Ordinance No. P. Of 1948)**

It is hereby certified that BI BI AS ma  
son/daughter of Mr. Meher Muhammad residing at Madina colony  
Alawan Kalli Ebru, Mardan was registered at this Employment  
Exchange on 26/11/2018 as an essential personnel and that  
his registration number is EP/TS/223/2018  
Employment Exchange Mardan

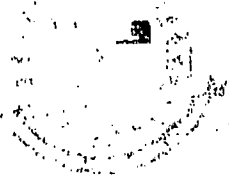
Dated 26/11/2018

**ATTESTED**

Signature [Signature]  
**MANAGER**  
Employment Exchange  
Mardan

25

Annex - "D"



**OFFICE OF THE PRINCIPAL**  
**GOVT: COLLEGE OF COMMERCE FOR WOMEN MARDAN.**

PHONE NO:-0937-9230090

**OFFICE ORDER:**

Mrs. Bibi Asma D/O Meher Muhammad resident of Madina Colony Post office Toru Tehsil & District Mardan, is hereby appointed as Cook in BPS-03 Plus usual allowances as admissible under the rules and posted at Government College of Commerce for Women, Mardan against the vacant post with effect from the date of taking over charge and subject to the terms and conditions stated as under:-

**TERMS & CONDITIONS:**

- 1- Her appointment will be in accordance with the contents of sub Section(2) of Section-19 of the Khyber Pakhtunkhwa, Civil Servants Act, 1973 (KPK, Act No. XVIII of 1973) as amended by the K.P.K Civil Servants (Amendment) Act 2005 (KPK, Act No. IX of 2005) and the rules framed there under.
- 2- She will have to join duty at her own expenses.
- 3- She will have to produce Certificate of Medical fitness from the concerned Medical Superintendent/Civil Surgeon within a week time of the resumption of duty.
- 4- She service shall be liable to termination on one month's notice from either side. In case of resignation without proper notice, one month's pay and allowances shall be forfeited.
- 5- Her character/antecedents are verified well by the Police authorities.
- 6- She will be governed by such rules and regulations as may be issued from time to time by the Government for the category of Government Servants to which he belongs.
- 7- She should report for duty to the Principal concerned within thirty (30) days of the issue of this order otherwise the offer of the appointment would be treated as cancelled.

**ATTESTED**

**PRINCIPAL**

Endst.No.GCC/W/MRD/CLASS-IV/ 659(1-5)

Dated: 20/12/2018.

**Copy forwarded to:-**

- 01 Director General Commerce Education & Management Science Peshawar.
- 02 The Deputy Commissioner Mardan.
- 03 The District Account Officer Mardan.
- 04 The Manager Employment Exchange Mardan.
- 05 Mrs. Rukhsana Begum W/O Naeem Ullah resident of Mohallah Dang Baba, Nali Par Hoti Tehsil & District Mardan
- 06 Office Record.

*Handwritten signature*  
**PRINCIPAL**

(26)

Annx — "E"

TO

The Principal


Govt College of Commerce (w)

Mardan

Subject: - Arrival Report.

In Pursuance of the Government of Khyber Pakhtunkhwa , Establishment and Administration Department Peshawar. Endost : No.GCC/W/MRD/CLASS-1V/659)1-5) Dated 20/12/2018. I beg to submit my arrival report as Cook on Dated 24/12/2018.(F.N).

Dated 24/12 2018

  
ATTESTED

  
Yours Obediently

Mrs. Bibi Asma

GCCW Mardan

27

TO

The Principal

Govt College of Commerce (w)

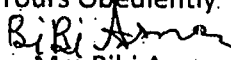
Mardan

Subject: - Arrival Report.

In Pursuance of the Government of Khyber Pakhtunkhwa , Establishment and Administration Department Peshawar. Endost : No.GCC/W/MRD/CLASS-1V/659)1-5) Dated 20/12/2018. I beg to submit my arrival report as Cook on Dated 24/12/2018.(F.N).

Dated 24/12/2018

  
**ATTESTED**

Yours Obediently,  
  
Mrs. Bibi Asma

GCCW Mardan



28

Annx - "F"

OFFICE OF THE PRINCIPAL  
GOVERNMENT COLLEGE OF COMMERCE FOR WOMEN  
MARDAM

OFFICE ORDER

Consequent upon the appointment of Mrs. Bibi Asma as Cook BPS-03 (Rs. 9610-390-21310) against the vacant post at this college office order Endst: NO.GCC/W/MRD/CLASS-1V/ 659 (1-4) Dated 20/-12/2018. He report for duty on the forenoon of 24/12/2018 and taken on the strength from the same date.

PRINCIPAL.

Endst:No.GCMS(W)MRD/

Dated 24/12/2018

Copy for information to & necessary action:-

- 1- The Director General Commerce Education & Management Sciences , Khyber Pakhtunkhwa, Peshawar
- 2- The District Account Officer Mardan.
- 3- Official concerned.
- 4- Office Order File
- 5- PF of the official concerned.

  
**ATTESTED**

  
PRINCIPAL

Principal  
Govt College of Commerce  
Mardan, Peshawar

29

Annex - G

**MEDICAL CERTIFICATE** No. 1738/083

Name of Official Mrs. Bibi Asma 10101-0490466-8

Caste of Race Afghan

Father's Name Mehar Mohammad w/o Noorul Amin

Residence Madina Colony Nawan Kuli, P.O. Toru Tehsil and District Mardan

Date of Birth 01-01-1984 (As per card)

Exact Height by measurement 5-4

Exact mark of identification Scar on Right hand

Signature of the Official \_\_\_\_\_

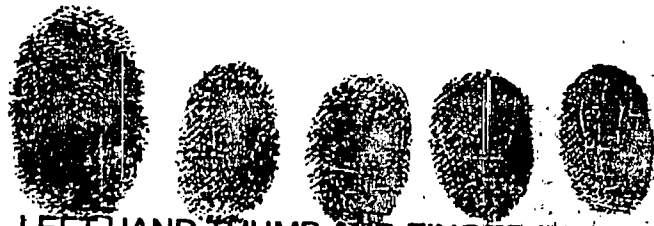
Signature of the Head of Office \_\_\_\_\_

**ATTESTED**

Seal of Office \_\_\_\_\_

I do hereby certify that I have examined Mrs. Bibi Asma for employment in the office of the Principal, GCC for Women Mardan and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nil

I do not consider this is disqualification for employment in the office of the above as Cook BIR-03 his age according to his own statement 35 year and by appearance about year thirty five years



**LEFT HAND THUMB AND FINGER IMPRESSION**

[Signature] 24/12/2018  
 Medical Superintendent, 2018  
 DHQ Hospital, Mardan.  
 Medical Superintendent  
 DHQ Hospital, Mardan.

Dated 24-12-2018



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT AND ADMINISTRATION DEPARTMENT**

30

**SERVICE CARD FORM**

Secretariat Employee    
  Attached Employee    
  District Employee

Department: G.C.C.W Mardan    
 Personal No: 00898756

Paste one recent Passport size photograph for Service Card

**Personal Information**

1. CNIC No: 1611011-0490466-8  
 2. Name: Bibi Asma  
 3. Father's/Husband's Name: Noor-Ul-Amin  
 4. Date of Birth: 04-03-1984  
 5. Gender / Sex:  Male  Female    
 6. Marital Status:  Married  Single  
 7. Blood Group: B    
 8. Religion: Islam  
 9. Mark of identification: \_\_\_\_\_

10. Province: KPK    
 11. District of Domicile: Mardan  
 12. Phone Office/Mobile: \_\_\_\_\_    
 13. Emergency Contact: \_\_\_\_\_

14. Present Address: Mohallah Medina Toru Nawakali Mardan

15. Permanent Address: Mohallah Medina Toru, Nawakali Mardan

**First Govt Appointment:** Day - Month - Year  
 16. Appointment Date: 20-12-2018    
 17. Designation: Cook BPS03  
 18. BPS: 03

**ATTESTED**

**Present Posting:** Day - Month - Year  
 19. Joining Date: 24-12-2018    
 20. Designation: Cook BPS03  
 21. BPS: 03    
 22. Service Group: \_\_\_\_\_

- 1. Initial Appointment
  - 2. Promotion
  - 3. Deputation
  - 4. Acting Charge
- e.g PAS/PMS, For BPS 17 & Above

**Qualification (start with the highest qualification):**

S.No	Institute Name & Address	Degree/Certificate	Year of Passing	Subject
1	University of Peshawar	M.A	2016	Islamicat
2	University of Peshawar	B.A	2013	Arts
3	Mardan Board	F.A	2009	Arts

<b>To be verified by Reporting Officer:</b>  Designation: _____  Signature/Date/Stamp: _____	<b>Verified by Estate Officer:</b>   Signature/Date/Stamp: _____
--	---



(31) Annx — "H"  
GOVT: COLLEGE OF COMMERCE FOR (W) MARDAN

PH: 0937-9230090

DATED: - 4/05/2021

NO. GCCW/(MRD)/2021/9281-

To

Miss Asma (Cook)

GCC (W) Mardan.

Subject:- EXPLANATION

You were found absent from your duty on 08<sup>th</sup> and 09<sup>th</sup> May, 2021 without any prior permission and without submitting proper application to the undersigned which is a clear cut violation of the prevailing service rules and resultantly sabotaging the rules of business.

You know that, there is too much work burden in the college due to BBA (Hons) and BS (Hons) classes, which needs to be discharged on priority basis but due to irregularity and non seriousness toward your duties; the undersigned face hurdles in the smooth run of the college.

You are therefore directed to explain your position within three (03) days of the issuance of this order that why not a disciplinary action shall be taken against you prevailing Service rules.

  
ATTESTED

PRINCIPAL

Endst: No. GCC(W)/MRD/2021/ 9281-

Dated: 04/05/2021

Copy forwarded for Information to

1. Director General Commerce Education & Management Sciences | Peshawar.
2. Official Concerned
3. Office Record

  
PRINCIPAL

جی . سی . سی ، ڈبلیو سردان

جناب عالم ا

تزارش ہے کہ میں نے 7 تاریخ کو آر

ز آئیے پر یہ ویکسین لگوائی تھی۔ میں نے بدن میں اس ویکسین  
کا ٹیم نہیں کھی۔ لیکن آپ نے کہا کہ یہ ویکسین خواجہ وار لگوادو

پر فان اور ٹائٹنڈ میں بدن میں موجود ہے۔ اس وجہ  
سے اس ویکسین نے مجھ پر یہی اٹکشن کیا۔ اور میں نے سہ ماہی

میں زیادہ درد اور صدمہ آ رہے تھے۔ اور ابھی کھا یہ صدمہ آ رہے  
ہے۔ آپ نے کہا کہ صدمہ نقل ہو سکتا ہے۔ تو میں نے صدمہ نقل

بجوا دیا۔ تو آپ نے اس صدمہ نقل اسبب سے نہیں کیا۔  
میں نے یہ صدمہ نقل اس لیے اور اس ڈاکٹر سے بنا یا۔ کیونکہ میں

س ڈاکٹر سے ٹائٹنڈ اور پر فان کا علاج کر رہی ہوں۔  
اور صدمہ جسم میں آجھی بھی بہت زیادہ کٹھن جسم چل رہا ہے

اس وجہ سے آفیس 7، 8 تاریخ کو حاضر نہ ہو سکی۔ میں کو ٹھیک  
تھی۔ لیکن آپ نے بار بار کہا کہ ویکسین کرو۔ تو ویکسین نہ کرنے

سبب یہ سببوں کہا۔ اور مجھ پر کٹھن لگ گیا اور سہ ماہی کے حکم بار بار  
نے اور آجھی بھی آ رہے ہیں۔ اور صدمہ میں تو بیماری بیماری

یہ (وہوشیاں) سہ ماہی کے لیے ہے۔ اور آپ نے صدمہ لگوانے سے انکسائشن لگادی

ATTESTED

Bibi Asma

BPS: 03

Date - 9-6-2021

Annex - "J"



MINISTRY OF NATIONAL HEALTH SERVICES REGULATIONS AND COORDINATION  
GOVERNMENT OF PAKISTAN

Issue Date: 07-09-2021



Certificate No. DJ7740586

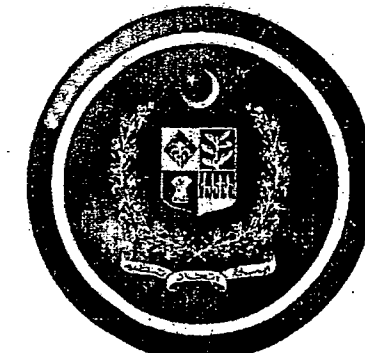
IMMUNIZATION CERTIFICATE FOR COVID-19

Name Bibi Asma  
Date of Birth 01-01-1984 CNIC / Identity No. 16101-0490466-8  
Nationality Pakistan Passport No. \_\_\_\_\_



FULLY VACCINATED

33



has been administered following COVID-19 vaccine:

Vaccine Name	Recommended Dosage	Dose	Date	Health Center	Manufacturer & Batch No
CoronaVac-SinoVac	2	1	07-06-2021	Mardan Medical Complex Mardan	Sinovac Lifesciences Co Ltd - Beijing Kexing Zhongwei Biotechnology C202104052
CoronaVac-SinoVac	2	2	07-09-2021	Type-D Hopsital Toru	Sinovac Lifesciences Co Ltd - Beijing Kexing Zhongwei Biotechnology 202108162F

ATTESTED



*[Signature]*

MINISTRY OF NATIONAL HEALTH  
SERVICES REGULATIONS & COORDINATION  
Issuing Authority

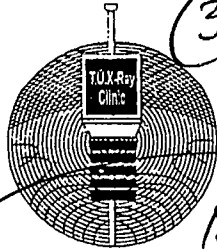
# Tariq COLOR Ultrasound Clinic & X-ray

Dr. Tariq Anwar //

M.B.B.S., M.C.P.S.  
D.M.R.D., BMUS

SENIOR CONSULTING RADIOLOGIST  
and Ultrasound Specialist  
District Headquarter Hospital Mardan

**Clinic:** Bahader Medical Centre  
opp: D.H.Q. Hospital  
Shamsi Road, Mardan



(34) Anwar K  
اکٹر طارق انور

ابی بی ایس، ایم ایس، ڈی ایم آر ڈی، بی ایم یو ایس

سرکنسلنٹ ریڈیالوجسٹ اینڈ الٹراساؤنڈ سپیشلسٹ

Mob: 0300-9305473

رکت ہیڈ کوارٹر ہسپتال مردان

بہادر میڈیکل سنٹر شمس روڈ بال تقابل ڈسٹرکٹ ہیڈ کوارٹر ہسپتال مردان

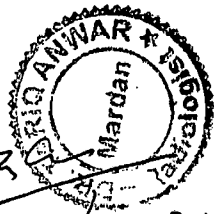
Date 8-6-21

Mucus discharge

certified the B.D. Anwar

is suffering from Eye pain & fever  
& Cornea vacuolated & Puffiness  
in eye (light) she is  
advise bed rest for 03 days

for today



8/6/2021

ATTESTED

(35)

Annex - "L"

گورنمنٹ کالج آف کامرس اینڈ مینجمنٹ سائنسز مردان

اسماء کوک

جواب طلبی

آپ کو بذریعہ نوٹس مطلع کیا جاتا ہے کہ مورخہ یکم جولائی سے اگست تک آپ چھٹی  
نی کالج کھولنے کے بعد آپ نے خاطر رجسٹر میں جولائی کی ساری  
ظری ایک دن میں لگائی جو کہ ایک غیر ذمہ دارانہ اور غیر قانونی فعل ہے  
اگر آپ کے پاس جولائی کے چھٹیوں میں کالج آنے کا کوئی ثبوت ہے تو اس کے آپ کو تین  
ماہوں اور اس کے شناختی کارڈ نمبر درکار ہونگے  
کالج انتظامیہ آپ کی اس رویہ سے تنگ آچکی ہے اور بار بار آپ کو سمجھانے کے بعد بھی آپ اپنا  
یے اور بدزبانی سے باز نہیں آتی۔

اسلیے آخری دفعہ آپ کو بذریعہ نوٹس مطلع کیا جاتا ہے کہ اس نوٹس کے دو دن کے اندر اپنا جواب  
درستی کے پاس جمع کرادیں ورنہ آپ کے خلاف انتظامی کارروائی عمل میں لائی جائی گی  
آپ کی فائل کو مزید کارروائی کے لیے ڈائریکٹریٹ بھیجی جائی گی۔

ATTESTED

پرنسپل

PRINCIPAL  
Govt. College of Commerce (W)  
Wardan

تاریخ 21-8-6

جی سی سی نمبر - مردان - 946

اپنی برائے۔

ایئر ایکٹریٹ جنرل کامرس اینڈ مینجمنٹ سائنسز پیارو

اسماء کوک



Amex "m"  
نورمنٹ کالج آف کامرس اینڈ مینجمنٹ سائنسز مردان  
(36)  
آسماء کوک

تشمہ میڈم

گزارش ہے جیسا کہ آپ نے نوٹس میں لیا ہے کہ آپ 1 جولائی  
سے آگسٹ تک چھٹی پر تھی۔ تو آپ صاحبان نے مجھے چھٹیوں کا نسیں کیا تھا  
جسکی وجہ سے میں 1 جولائی سے کالج آتی رہی جسٹر آئیے پاس تھا۔  
جو آپ نے لکھا کیا تھا اور بابو صاحب نے مجھے پرو فارم دیا تھا  
جس میں ہم نے حاضرگی لگائی ہیں۔ عید کے چھٹیوں کے علاوہ میں  
نے اپنی حاضرگی برقرار رکھی تھی۔ بطور ثبوت پرو فارم میرے  
پاس موجود ہے۔ اور Sweeper نورین بھی کالج آتی رہتی تھی۔  
رشد بابو، نورین اور چوکیدار سب میرے گواہ ہیں۔ اور حاضرگی  
میں نے ساری اس لئے لگائی ہے ایک دن میں۔ کیونکہ جسٹر آئیے  
پاس لکھا ہوا تھا۔ تو میں ایک ایک دن کی حاضرگی سے لگاتی  
وہ میں نے پرو فارم میں لگائی ہے آپ چیک کر سکتی ہے  
اور باقی ایک کلاس فور بھی نہیں آئی تھی۔

شکر بہ

ATTESTED

موافقہ = 6-8-2021

# GOVT: COLLEGE OF MANAGEMENT SCIENCES MARDAN.

ATTENDANCE PROFORMA FOR THE MONTH OF 1st July 2021 - 31 July

CLASS:-M.COM-II (2ND SHIFT)

SESSION:-

SUBJECT

37

Annex - "N"

NO	NAME	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	T.ABSENTY	T.ATTENDANCE		
1	Asma Bibi	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
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**ATTESTED**

38

Annx - "0"



OFFICE OF THE PRINCIPAL  
GOVT: COLLEGE OF COMMERCE (W) MARDAN.  
PHONE NO: -0937-9230090

NO. GCC/(W)/2021/ 975

DATED: 22/10/2021

To

Asma Bibi

/ Hostel Cook

GCC (W) Mardan

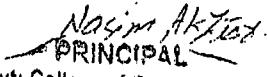
Subject: - EXPLANATION

Asma Bibi you are directed to Explain and clear your position. You were under observation for the last few months. Your lavish language, your non seriousness in job and your misbehave disrupting the college environment. So many times your duty was rotated upon your request, lavish excuses and staff complaints against you.

Now you have threatened the undersigned in the office during performing her official duty. Your threat assures that even life of the undersigned is on risk. Which may have cast upon you and May goes against you in future.

Your reply should reach to the undersigned within three days.

  
**ATTESTED**

  
**PRINCIPAL**  
Govt: College of Commerce (W)  
**PRINCIPAL**

To

(39) Annx - "P"

The principal

Govt. College of Commerce (W) Mysore

Subject: Explanation

It is very humbly stated that

I am performing my duties with Zeal and zest since taking charge at this

College. It is also stated that considering

the complaints of staff against a class employee is just an apprehension and he

a competent authority you know the point of every person better.

I am not personal and I have nothing with you.

Ram  
ATTESTED

I didn't threaten you, but by threat once to stop my pay at Account office, have just replied in response.

~~will~~ will not have such a problem. and in future (Ann)

بخدمت جناب ڈائریکٹر صاحب ایٹی کرپشن چیئر پمختو ننحو اسپتاور

درخواست براد شروع کرنے انکواری مابست  
غیر قانونی بھرتی مسماة بی بی اسماء دختر مہر محمد ساکنہ  
مدینہ کالونی، ڈاکخانہ طور و تحصیل و ضلع مردان  
حال COOK-BPS-03 گورنمنٹ کامرس  
کالج برائے خواتین ضلع مردان

جناب عالی: سانکہ حسب ذیل غرض رساں ہے۔

1- یہ کہ سانکہ ضلع مردان کی مستقل باشندہ ہے۔

2- یہ کہ سانکہ نے ایف اے تک تعلیم حاصل کی ہے بدیں وجہ دفتر روزگار Employment Exchange ضلع مردان میں روزگار کیلئے رجسٹرڈ کروایا ہے۔ (نقل لف درخواست ہذا ہے)۔

3- یہ کہ اس وقت گورنمنٹ کامرس کالج برائے خواتین مردان میں کلاس فور (Class-IV) کی آسامیاں خالی تھیں تو اس وقت کی پرنسپل نے مذکورہ بالا کالج نے نیچر دفتر روزگار Employment Exchange مردان سے اہل امیدواروں کی فہرست طلب کی جس میں سانکہ کا نام سیریل نمبر 02 پر درج تھا اور بعد ازاں سانکہ کو باقاعدہ انٹرویو کیلئے بلایا گیا بعد ازاں انٹرویو سانکہ کو کہا گیا کہ اسکی سلیکشن ہوگی ہے تاہم Appointment Order نہیں دیا گیا۔

ATTESTED

ATTESTER

4- یہ کہ سالکہ نے اس وقت کی پرنسپل مذکورہ بالا کالج کو بھی کئی درخواستیں دی لیکن سالکہ کو کوئی جواب نہیں دیا اور سالکہ انتظار کرتی رہی۔

5- یہ کہ کچھ دن قبل موجودہ پرنسپل صاحبہ مذکورہ بالا کالج نے سالکہ کو طلب کیا اور کہا کہ آپ کی بھرتی مذکورہ بالا پوسٹ پر کیوں نہیں کی گئی ہے تو سالکہ نے سارا قصہ سنایا اور مزید کہا کہ میں نے تو اس سلسلے میں کئی درخواستیں دے رکھیں ہیں، لیکن سالکہ کو کوئی جواب نہیں ملا ہے تو اس پر موجودہ پرنسپل صاحبہ نے مسماۃ اسماء بی بی دختر مہر محمد ساکنہ مدینہ کالونی ڈاکخانہ طور و تحصیل و ضلع مردان کاتیناتی آرڈر دکھایا۔

6- یہ کہ جب سالکہ نے مذکورہ مسماۃ بی بی اسماء کے تعیناتی آرڈر کا بغور مطالعہ کیا اور یادداشت پر زور دیا تو سالکہ کے ذہن میں آیا کہ مذکورہ بالا خاتون تو شارٹ لسٹ امیدواروں میں نہیں تھی تو پرنسپل صاحبہ کو بتایا کہ کس طرح بی بی اسماء کو بھرتی کیا گیا ہے۔

7- یہ کہ اب سالکہ کو معلوم ہوا ہے کہ مسماۃ بی بی اسماء کو غلط اور غیر قانونی طور پر بھرتی کیا گیا تھا جبکہ سالکہ کو اس وقت بتایا بھی گیا تھا کہ اسکی سلیکشن کی گئی ہے کیونکہ اس وقت سالکہ شارٹ لسٹ امیدواروں میں زیادہ تعلیم یافتہ اور سوزوں امیدوار تھیں لیکن اس کو تعیناتی حکم نہیں دیا گیا اور سالکہ کو انتظار کا کہتے رہے اور اب معلوم ہوا کہ بی بی اسماء کاتیناتی حکم چھپایا گیا تھا جس میں اس وقت کی پرنسپل صاحبہ کی بدینتی شامل تھی۔

8- یہ کہ مذکورہ عملہ حالات و واقعات کی روشنی میں بی بی اسماء مذکورہ بالا کی بھرتی کی تحقیقات کی جائے اور ہر مطابق قانون انکو اتری کر کے حقائق سامنے لائے جائے تاکہ سن سالکہ کو اس کا حق مل جائے

ATTESTED

ATTESTED

(42)

اور ملوث افراد کی نشاندہی کر کے ان کی خلاف عملہ کارروائی کی جائے۔

اہم نذا استدعا کی جاتی ہے کہ مذکورہ بالا حقائق اور واقعات کے تناظر میں برطابق قانون  
مذکورہ بالا بھرتی کی انکوائری کی جائے اور سائلہ کو اس کا حق دیا جائے۔

المرقوم 11/11/2021

سائلہ Rana

رخسانہ بیگم زوجہ نعیم اللہ

ساکن۔ ڈانگ بابا ڈاکخانہ ہوتی مردان

شناختی کارڈ نمبر 0-3237983-16101

رابطہ نمبر 0313-5757929

کاپی برائے ضروری کارروائی و اطلاع :-

- 1- ڈائریکٹر جنرل کامرس ایجوکیشن اینڈ ٹیکنالوجی سائینس پشاور
- 2- ڈپٹی کمشنر صاحب مردان
- 3- میجر ایسپلائمنٹ آفیسر مردان
- 4- ڈی جی نیب خیبر پختونخوا ایشیا راجیات آباد پشاور
- 5- ڈائریکٹر ہوٹل ریسٹورانٹس پشاور ہائی کورٹ پشاور
- 6- پرنسپل گورنمنٹ کامرس کالج برائے خواتین مردان

ATTESTED

ATTESTED

ظاہر کالغ و زال

صداہ عالیہ

ہم سے پیشگی لکھی ارسال ہوئی ہے جو کہ میں نے مطلع ہو جانے کے  
 کی مستقل باشندہ ہوں میں نے اپنی اس حق تصدیق حاصل کی ہے  
 میں نے حاصل کالغ میں Classmate کے لئے Apply کیا گیا  
 اس وقت کی تکلیف صد کوہ مال کالغ کے ذریعہ روزگار و جلال سے  
 میں امیدواروں کی صورت طلب کی جس میں میں نے اپنی اسمبلی  
 میں 2000 سے زیادہ اس کے لئے درخواستیں لکھیں اور ان کے لئے  
 لکھا کہ آپ کی سلیکشن ہوگی تاکہ آپ اپنی Appointment order  
 میں دیا گیا وقت کے اصل وقت کے مطابق کوئی درخواستیں دی  
 گئیں اس کے لئے جو کہ میں نے دیا ہے اس کے مطابق کوئی رہی  
 اب مجھے باخبر ذرا عرصے سے معلوم ہوا کہ میری طلبہ مسماۃ بی بی آسماء  
 کو غلط لکھا گیا ہے اور ان کے لئے طلبہ کو لکھا گیا ہے کہ مجھے اس وقت  
 تک لکھا گیا ہے کہ آپ کی سلیکشن ہوگی تاکہ آپ اس وقت  
 سٹارٹ لیسٹ (مردمانوں) میں زیادہ تعلیم یافتہ (مردمانوں)  
 امیدواروں میں ان میں سے چار لکھے گئے ہیں کہ بی بی آسماء کا تعلق  
 علم جیٹا مالک ہے جو کہ ان کے لئے درخواستیں لکھی گئیں اس کا اندراج  
 ہو گیا ہے تاکہ آپ کو Appointment order لکھا گیا ہے تاکہ آپ  
 میرے پاس اپنا فارم (درخواست) منجور ہو جائے  
 آپ سے میری درخواستیں ہے کہ ان کے لئے طلبہ و اطفال کو  
 سٹارٹ لیسٹ (مردمانوں) میں آسماء کے لئے درخواستیں لکھی گئی ہیں تاکہ

ATTESTED

Handwritten signature and stamp



(44)

اس متعلقہ کارروائی کے بارے میں جاننے کے لیے  
میں نے

19-11-21 کو، <sup>میرا</sup> سے

R.sana

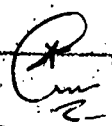
میں نے اپنے خفیہ دست نامہ

میں نے اس کے ساتھ

CNIC No 16401-3237988-0

Mobil No 0313-5757929

0342-9192590



ATTESTED



OFFICE OF THE DEPUTY COMMISSIONER, MARDAN

Phone No: 0937-9230048-56 Fax No: 0937-9230303

Email: dcmardan0937@gmail.com

No. 1786 /DC(M)/EA-32

Dated Mardan the: 19/11/21


To:-

The Principal  
Govt Collège of Commerce (Women)  
Mardan.

Subject:- Application.

Memo:-

Enclosed is letter No. Nil dated 11-11-2021, received from Ruksana Begam W/O Naeem Ullah R/O Dang Baba PO Hoti Mardan on the subject noted above for further necessary action under intimation to this office, pt

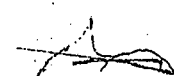
  
Superintendent  
For Deputy Commissioner,  
Mardan

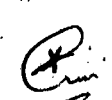
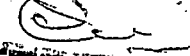
Endst No. & Date Even:

Copy to:

The applicant for information..

رخسانہ بیگم زویہ  
سکونت ڈانگ بابا ڈانگ پو ہتی مردان  
0313-5757929

  
Superintendent  
For Deputy Commissioner,  
Mardan

  
**ATTESTED**   
**ATTESTED**

(46)

Annex - T

From,  
The Principal  
Gcc(w), Mardan.

To

Mst. Bibi Asma  
Cook, Gcc(w),  
Mardan

Subject: Salary discontinuation

Your appointment order is doubtful, when it was read by the undersigned. The different names can be seen in your appointment letter. Appointment letter was may be in the name of Mrs. Rukhsana Begum because her name is mentioned in (copy forwarded to) portion. May or may not be wilfully her name was erased in the top of letter while dispatching, what so ever?

The audit objection can be raised any time on DDO. So, your salary may be stoped by the undersigned by this month until you clear yourself from the directorate.

*Nasim Akhtar*  
Principal  
PRINCIPAL  
Govt. Gcc(w) Mardan  
Mardan

*Rim*  
ATTESTE

Copy for information to:

1. PA to DG(CE&MS) HED, KP.
2. Mst. Bibi Asma D/O Meher Muhammed class-iv GCC(W), Mardan.
3. Director Admin DG(CE&MS) HED, KP. From,

The Principal  
Gcc(w), Mardan.

(47)

Annex- T/11

To

The Director Administration,  
Commerce Education and Management Sciences,  
Khyber Pakhtunkhwa, Peshawar.

Subject: **SALARY DISCONTINUATION**

Respected Sir,

Reference to a letter received from GCC(W), Mardan without any dispatch No. and official college logo, it is stated that my salary has been stopped by the Principal concerned without any solid reason. Principal concerned has just made a personal statement that my Appointment order is doubtful and a copy for information has been made to a woman named Rukhsana in my order. So, on this reason she stopped my salary. Principal concerned has made it ground to stop my salary which is out of the mind of a sound person.

You know when an interview is scheduled for a post, 5 candidates are called for interview and Rukhsana was also one of them. So, Rukhsana was just forwarded a copy for information that Mrs. Bibi Asma has been selected as a cook.

A question arises that serving on my post for years I have never been asked by any Principal that your order is doubtful but this Principal has done it which is just a mere oppression and personal interest or lack of knowledge of business.

Keeping in view all of the above, you are requested to direct the Principal concerned to open my salary as soon as possible and stop annoying me without any reason. This college is the property of Government and we both are just employees.

Note: All my documents i.e Appointment Order, Employment Exchange Registration Certificate, Medical, Charge report and Arrival report are enclosed with this letter.

Thanks,

Yours, sincerely

  
**ATTESTED**

BIBI ASMA

Cook  


Copy for information:

1. Principal GCC(W), Mardan.
2. PA to DG(CE&MS) HED, KP.

# Attendance sheet

48

1-2-2022

days	time	sign	out time	sign
1)	8:10	A	12:00	A
2)	8:15	A	12:00	A
3)	8:20	A	12:00	A
4)	8:25	A	12:00	A
5)		Kashmir	day	
6)		Sunday		
7)	8:10	A	12:10	A
8)	8:30	A	12:10	A
9)	8:30	A	12:15	A
10)	8:10	A	12:10	A
11)	8:15	A	12:10	A
12)	8:18	A	12:30	A
13)		Sunday		
14)	8:10	A	12:10	A
15)	8:10	A	1:00	A
16)	8:00	A	12:30	A
17)	8:05	A	12:20	A
18)	8:30	A	12:00	A
19)	8:30	A	12:30	A
		Sunday		
20)			<b>ATTESTED</b>	
21)	8:10	A	12:30	A
22)	8:15	A	12:30	A
23)	8:20	A	12:00	A
24)	8:30	A	12:00	A
25)	8:30	A	12:00	A

Days	time	Attendance	Sign	out time	Sign
1)	8:25		A	12:00	A
2)	8:15		A	12:00	A
3)	8:20		A	12:00	A
4)	8:15		A	12:30	A
5)	8:10		A	12:20	A
6)		Sunday			
7)	8:10		A	12:10	A
8)	8:20		A	12:00	A
9)	8:10		A	12:00	A
10)	8:25		A	12:00	A
11)	8:20		A	12:10	A
12)	8:15		A	12:00	A
13)		Sunday			
14)	8:25		A	12:10	A
15)	8:20		A	12:00	A
16)	8:10		A	12:00	A
17)	8:10		A	12:30	A
18)					
19)					
20)		Sunday			
21)	8:10		A	12:30	A
22)	8:10		A	2:00	A
23)		Defence day			
24)	8:00		A	12:45	A
25)	8:10		A	12:30	A
26)	8:00		A	2:00	A
27)	<del>8:00</del>		Sunday	<del>2:00</del>	A
28)	8:00		A	2:00	A
29)	8:00		A	2:00	A
30)	8:00		A	2:00	A

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*[Signature]*

1-3-2022

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Government of Khyber Pakhtunkhwa  
District Accounts Office Mardan  
Monthly Salary Statement (August-2021)

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Personal Information of Mr BIBI ASMA d/w/s of MEHER MUHAMMAD

Personnel Number: 00898756 CNIC: 1610104904668  
Date of Birth: 01.01.1984 Entry into Govt. Service: 24.12.2018

NTN:  
Length of Service: 02 Years 08 Months 009 Days

Employment Category: Active Temporary

Designation COOK 80394184-GOVERNMENT OF KHYBER PAKH

DDO Code: MP4721-Govt Commerce College (Women) Mardan

Payroll Section: 003 GPF Section: 003 Cash Center:

GPF A/C No: Interest Applied: Yes GPF Balance: 27,610.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 03 Pay Stage: 2

Wage type	Amount	Wage type	Amount
0001 Basic Pay	10,390.00	1001 House Rent Allowance 45%	2,120.00
1210 Convey Allowance 2005	1,785.00	1300 Medical Allowance	1,500.00
2211 Adhoc Relief All 2016 10%	804.00	2224 Adhoc Relief All 2017 10%	1,039.00
2247 Adhoc Relief All 2018 10%	1,039.00	2264 Adhoc Relief All 2019 10%	1,039.00
2309 Adhoc Relief All 2021 10%	1,039.00	2311 Dress Allowance - 2021	1,000.00
2312 Washing Allowance 2021	1,000.00	2313 Integrated Allowance 2021	600.00

Deductions - General

Wage type	Amount	Wage type	Amount
3003 GPF Sub-creation	-770.00	3501 Benevolent Fund	-600.00
3534 R. Pen & ...	-300.00	3990 Emp. Edu. Fund KPK	-60.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions In Tax Payable: Recovered till August-2021: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 23,355.00 Deductions: (Rs.): -1,730.00 Net Pay: (Rs.): 21,625.00

Payee Name: BIBI ASMA  
Account Number: 7900163401  
Bank Details: ... ANIC LIMITED, 220902 TORU, MARDAN, TORU, MARDAN., MARDAN

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Add: City: MARDAN Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
Temp. Address: City: Email:

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Annex "U"

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AUDIT REPORT OF OPEN ENQUIRY NO.05/2022-EDU: AGAINST THE CONCERNED STAFF OF GOVT: COMMERCE COLLEGE FOR WOMEN DISTT: MARDAN (C NO.11264 DATED 17.11.2021).

ACCUSATIONS:

A complaint submitted by Mst. Rukhsana Begum containing allegations of Corruption, illegal appointment and mis-use of official power by the subject officers/officials etc (Annex-A).

PREAMBLE:

On the direction of the worthy Director, Anti-Corruption Establishment, Khyber Pakhtunkhwa, Peshawar an audit was conducted by the undersigned in presence of Investigation Officer and concerned staff of the office of Principal Govt: College of Commerce for Women Mardan. The concerned staff produced the relevant record which was audited in their presence.

AUDIT EXTRACT:

During the course of an audit it was revealed that the office of Principal Govt: College of Commerce for Women Mardan vide letter No.GCC/WOMEN/PF(MRD)/578 dated 22.11.2018 addressed to the Manager Employment Exchange, Mardan for provision list of suitable unemployed registered class-IV candidates (Annex-B). The office of Manager Employment Exchange Mardan vide No.EE/Mdn/Recr/1-13/210(1-2) dated 27.11.2018 depicted that a list of suitable unemployed registered class-IV candidates sent to the office of Principal Govt: College of Commerce for Women Mardan (Annex-C). The Office of Principal Govt: College of Commerce for Women Mardan constituted a Departmental Selection Committee vide No.GCC/V/(MRD)/2018/612 dated 01.12.2018 (Annex-D).

On probing the matter, it was revealed that Mst. Bibi Asma D/O Meher Muhammad was appointed as Cook in BPS-03 but her name was not included in the list provided by the office of Manager Employment Exchange Mardan vide No.EE/Mdn/Recr/1-13/210(1-2) dated 27.11.2018 which is violation of "The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989". (Annex-E). For appointment of Class-IV employees, in the Province under the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 have provided two modes. The reading of the Rule-10 relevant for the purpose would be imperative in the given circumstances which read as under:-

CO, Mardan  
For n/a  
under law  
As per  
Mdn  
25/03/2022

Rule-10. Appointment by initial recruitment. (1) Initial appointment to posts in various pay scales shall be made-  
(a) If the posts falls within the purview of the Commission, on the basis of Examination or test to be conducted by the Commission; or  
(b) If the post does not fall within the purview of the commission, in the manner determined by Government. Initial recruitment to the post which does not fall within the purview of the Commission, shall be as may be made on the recommendation of the Departmental Selection Committee vacancies have been advertised in newspapers: Provided that nothing contained in this sub-rule shall apply to the household staff of the Chief Minister's House Peshawar, Frontier House Islamabad, Frontier Rest House Bannu, Swat and Abbottabad, Frontier House Nathiagali and Shahi Mehman Khana, Peshawar and any other House to be established by the Government. Provided further

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AUDIT REPORT OF OPEN ENQUIRY NO.05/2022-EDU: AGAINST THE CONCERNED STAFF OF GOVT: COMMERCE COLLEGE FOR WOMEN DISTT: MARDAN (C NO. 11264 DATED 17.11.2021).

ACCUSATIONS:

A complaint submitted by Mst. Rukhsana Begum containing allegations of Corruption, illegal appointment and mis-use of official power by the subject officers/officials etc (Annex-A).

PREAMBLE:

On the direction of the worthy Director, Anti-Corruption Establishment, Khyber Pakhtunkhwa, Peshawar an audit was conducted by the undersigned in presence of Investigation Officer and concerned staff of the office of Principal Govt: College of Commerce for Women Mardan. The concerned staff produced the relevant record which was audited in their presence.

AUDIT EXTRACT:

During the course of an audit it was revealed that the office of Principal Govt: College of Commerce for Women Mardan vide letter No.GCC/WOMEN/PF(MRD)/578 dated 22.11.2018 addressed to the Manager Employment Exchange, Mardan for provision list of suitable unemployed registered class-IV candidates (Annex-B). The office of Manager Employment Exchange Mardan vide No.EE/Mdn/Recr:/1-13/210 (1-2) dated 27.11.2018 depicted that a list of suitable unemployed registered class-IV candidates sent to the office of Principal Govt: College of Commerce for Women Mardan (Annex-C). The Office of Principal Govt: College of Commerce for Women Mardan constituted a Departmental Selection Committee vide No.GCC/W/(MRD)/2018/612 dated 01.12.2018 (Annex-D).

On probing the matter, it was revealed that Mst Bibi Asma D/O Mehor Muhammad was appointed as Cook in BPS-03 but her name was not included in the list provided by the office of Manager Employment Exchange Mardan vide No.EE/Mdn/Recr:/1. 13/210(1-2) dated 27.11.2018 which is violation of "The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989". (Annex-E). For appointment of Class-IV employees, in the Province under the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 have provided two modes. The reading of the Rule-10 relevant for the purpose would be imperative in the given circumstances which read as under:-

Rule-10. Appointment by initial recruitment. (1) Initial appointment to posts in various pay scales shall be made-

(a) If the posts falls within the purview of the Commission, on the basis of Examination or test to be conducted by the Commission; or

(b) If the post does not fall within the purview of the commission, in the manner determined by Government. Initial recruitment to the post which does not fall within the purview of the Commission, shall be as may be made on the recommendation of the Departmental Selection Committee vacancies have been advertised in newspapers. Provided that nothing contained in this sub-rule shall apply to the household staff of the Chief Minister's House Peshawar, Frontier House Islamabad, Frontier Rest House Bannu, Swat and Abbottabad, Frontier House Nathiagali and Shahi Mehman Khana, Peshawar and any other House to be established by the Government. Provided further

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that the appointment in Basic Pay Scale 3 to 5 shall be made on the recommendations of the Departmental Selection Committee through the District Employment Exchange concerned, or, where in a district the office of the Employment Exchange does not exist after advertising the post in leading newspapers.

The above, rule clearly reflects that firstly, if the post falls within the purview of the commission, is to be filled in through the commission i.e. Public Service Commission and secondly if the post does not fall within the purview of the commission in the manner as may be determined by Government. According to the second provision of the above rules, the initial appointment in the pay scales 3 to 5 (amended vide notification No SO (R-VI) E&AD / 1-3 / 2015 dated 19.4.2016) previously it was BPS 1 to 4, was to be made on the recommendations of the Departmental Selection Committee through the District Employment Exchange concerned, or when in a district the office of the Employment Exchange does not exist, after advertising the post in the leading newspaper.

(17)

A letter of Ms. Nayab Gul addressed to the enquiry committee revealed that they conducted interviews of female applicants only, they were provided a computerized attendance sheet on which Names of 7 females candidates were typed. They interviewed 6 of them and one was absent. At the end of the interview, the committee agreed upon Ms Rukhsana Begum to be appointed as cook. She also declared that her signature on attendance sheet is fake (Annex-F). A letter of Ms Hejab Rahman addressed to the Principal GCMS (W) Mardan shows that the committee decided to hire Mst. Rukhsana Begum. Later on by the instruction of the then Director Administration Mr. Tayyab appointment letter of the Mst. Asma Bibi was signed. Oral objection was raised by her to the then Director Administration as Mst. Bibi Asma was neither interviewed in her presence nor any call letter was sent to her, even her name was not mentioned in the list of employment exchange Mardan. She was told by the then Director Administration that she has been selected and her details would be provided shortly by the directorate. Despite her calls no detail was provided to her. Moreover, the complete hiring file of all the class IV was not provided just to show their hegemony. Furthermore, the females' attendance list shows the name of Mst Bibi Asma entered manually afterward and without her knowledge. The list include her signature and Ms Nayab Gul signature only and those are fake (Annex-G).

Moreover, in order to authenticate the appointment & recommendation of Departmental Selection Committee; duly signed minutes of meeting of the selection committee, was not provided and missing from the office record. A Departmental enquiry is also conducted in which the enquiry committee concluded that the appointment was made illegal and void ab initio as the candidate Mst Bibi Asma was not from the amongst the list of registered candidate provided by the manager employment exchange (Annex-H).

#### CONCLUSION:

Keeping in view the above scenario and scope of an audit, the signatory arrived to the conclusion that Mst Bibi Asma was appointed as Cook in BPS-03 but her name was not included in the list provided by the office of Manager Employment Exchange Mardan. The available records indicate nepotism, favoritism, negligence, violation of rules & regulation and non-observance of merit in selection process.

(Signature)  
**ATTESTED**

(Signature)  
**ATTESTED**

LOSS TO GOV'T EXCHEQUER:

The available record reveals that Rs. 507,173/- financial loss occurred to Government Treasury at this stage.


RESPONSIBLE:

1. Mst Bibi Asma being direct beneficiary
2. The Concerned Officer/Officials involved in illegal appointment and stealing duly signed minutes of meeting of the selection committee
3. Other persons if found involved later on during the course of investigation.

RECOMMENDATION:

1. Circle Officer/Investigation Officer initiate legal proceedings against the responsible under the rules.
2. Just may be providing to the complainant under the relevant law/rules.

Report is submitted please.

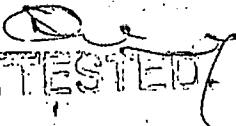
  
Senior Auditor (IV)  
Anti-Corruption, Establishment  
Khyber Pakhtunkhwa,  
Peshawar.

No. 278-82 /ACE/Dated 24/03/2022.

Copy forwarded to the:-

1. Director Anti-Corruption Establishment, Khyber Pakhtunkhwa Peshawar.
- ✓ 2. Assistant Director Crimes, Mardan.
3. Circle Officer District, Mardan. (Original Enquiry File & all relevant record enclosed)
4. Statistical Assistant, ACE, Peshawar.
5. Audit Section, ACE, Peshawar.

  
**ATTESTED**

  
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Annex - V

The Director General,  
Commerce Education & Management Sciences  
Khyber Pakhtunkhwa Peshawar.

Subject: COMPLAINT FOR ILLEGAL APPOINTMENT OF THE COOK AT  
GCC(W) MARDAN LODGED BY MS. RUKHSANA BEGUM W/O  
NADEM KHAN, RESIDENT OF DANG BABA, POST OFFICE HOTI  
MARDAN

Dear Sir,

Please receive hereunder the findings of Enquiry Committee, formed vide Office Order No. DGCE&MS/Admn/Enquiry Gen/1253(1-7) dated 06-01-2022 to prob the matter mentioned in the subject above, for your kind consideration please. It seems also pertinent to mention that according to the nature of the case, the study is broadly divided into two parts. The First Part pertains to Illegal Appointment of Class-IV (Cook), and the Second Part pertains to Protection against Harassment of women at work place.

Annexure attached include

1. Enquiry Committee constituted vide order No. DGCE&MS/Admn/Enquiry Gen/1253(1-7) dated 06/01/2022.
2. Copy of Appointment Letter of Bibi Asma (cook)
3. Copy of Arrival Report of Bibi Asma (cook)
4. Copy of Complaints by Rukhsana Begum. (The Complainant)
5. Copy of Requisitioning List of the Registered Candidates by the Employment Exchange
6. Questionnaire (handwritten) filled by Bibi Asma Cook
7. Copy of Judgment.
8. Complaint lodged by Ms. Hijab Rehman Associate Professor (Commerce).
9. Questionnaire provided to the complainant and the responses.
10. Written reply of the by the Professor Muhammad Nadeem.

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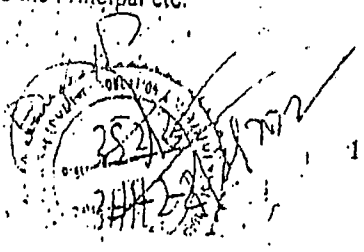
**ILLEGAL APPOINTMENT PART OF THE ENQUIRY**

**FINDINGS OF THE ENQUIRY**

Ms. Bibi Asma was appointed as Cook (BPS-3) against the vacant post at GCC (W) Mardan on 20-12-2018.

Later, on 11-11-2021, after three years, Ms. Rukhsana Begum, who was also a contestant for the said post at that time, and was not selected, questioned the authenticity of the said appointment through a formal complaint to the Director Anti-corruption KP, citizen Portal, DGCE&MS KP and directly lodging complaint to the Principal etc.

  
**ATTESTED**



1 Page

  
**ATTESTED**

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The Director General.  
Commerce Education & Management Sciences  
Khyber Pakhtunkhwa Peshawar.

Subject: COMPLAINT FOR ILLEGAL APPOINTMENT OF THE COOK AT GCC(W) MARDAN LODGED BY MS. RUKHSANA BEGUM W/O NAEEM KHAN, RESIDENT OF DANG BABA, POST OFFICE HOTI MARDAN

Dear Sir,

Please receive hereunder the findings of Enquiry Committee, formed vide Office Order No. DGCE&MS/Admn/Enquiry Gen/1253(1-7) dated 06-01-2022 to prob the matter mentioned in the subject above, for your kind consideration please. It seems also pertinent to mention that according to the nature of the case, the study is broadly divided into two parts. The First Part pertains to Illegal Appointment of Class-IV. (Cook), and the Second Part pertains to Protection against Harassment of women at work place.

  
**ATTESTED**

Annexure attached include

1. Enquiry Committee constituted vide order No. DGCE&MS/Admn/ Enquiry Gen/12539 (1-7) dated 06/01/2022.
2. Copy of appointment Letter of Bibi Asma ( Cook)
3. Copy of Arrival Report of Bibi Asma ( Cook)
4. Copy of Complaints by Rukhsana Begum. (The Complainant)
5. Copy of Requisitioning List of the Registered Candidates by the Employment Exchange
6. Questionnaire (handwritten) filled by Bibi Asma Cook
7. Copy of Judgment.
8. Complaint lodged by Mst. Hijab Rehman Associate Professor (Commerce).
9. Questionnaire provided to the complainant and the responses.
10. Written reply of the by the Professor Muhammad Nadeem.

### 1. ILLEGAL APPOINTMENT PART OF THE ENQUIRY

#### FINDINGS OF THE ENQUIRY :

One Bibi Asma was appointed as Cook (BPS-3) against the vacant post at GCC (W) Mardan on 20-12-2018.

Later, on 11-11-2021, after three years, Ms. Rukhsana Begum, who was also a contestant for the said post at that time, and was not selected, questioned the authenticity of the said appointment through a formal complaint to the Director Anti-corruption KP, citizen Portal, DGCE&MS KP and directly lodging complaint to the Principal etc.

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Enquiry Proceedings

The Enquiry Committee visited GCC (W) Mardan on dated 17-01-2022 and the following essential record/documents for checking the authenticity of the appointee in question, were demanded from the worthy Principal (current) Ms. Naseem Begum at GCC (W) Mardan. These include:

1. The appointment letter in question.
2. Requisitioning List of the Registered Candidates by the Employment Exchange.
3. Duly signed Minutes of Meeting of the Selection Committee formed for conducting interviews of the candidates mentioning name(s) and Post for which selected.

Of the three aforementioned essential documents, only two i.e. appointment letter and requisitioning list of the eligible candidates from the Employment Exchange was found in the College record. While neither the College concerned nor the Directorate could provide the Minutes of Meeting of the Selection Committee, as these documents were missing from the office record.

Through scrutiny of requisitioning list of the eligible candidates provided by the Manager Employment Exchange, it is disclosed that Ms. Bibi Asma was not one of the eligible candidates. Which means her application was lodged/accepted directly for the said post and was appointed. Which is a clear violation of PHC Judgment dated 03-10-2018, circulated for strict compliance by NAB KP in its letter circulated vide No. 3/2/Monitoring/A&P/NAB(KP)/401 dated 15 May, 2019 (Sareer Ahmed and others Vs Secretary Government of Khyber Pakhtunkhwa Health Department Peshawar), which says that the appointment of the candidate in question is not in compliance with the requisitioning list of eligible candidates provided by the Employer/Manager/Exchange.

Therefore, it can easily be concluded that the appointment made ~~is not valid~~ as the candidate appointed Ms. Bibi Asma was not from amongst the list of Registered Candidates provided by the Manager Employment Exchange.

**2. HARASSMENT PART OF THE CASE**  
**COMPLAINT FILED BY MST. HIJAB REHMAN ASSOCIATE PROFESSOR**  
**COMMERCE V/S PROFESSOR MUHAMMAD NADEEM PRINCIPAL GCMS-I**  
**BOYS MARDAN UNDER THE PROTECTION AGAINST HARASSMENT OF**  
**WOMEN AT THE WORK PLACE ACT 2010.**

Enquiry Report

The enquiry committee visited GCC(W) Mardan and GCMS-I Bbys Mardan on 17/01/2022. The committee delved into the essence of the matter by interviewing both the complainant and the accused. Their responses were brought in written form and recorded thoroughly. Their written statements are annexed with the report.

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**Enquiry Proceedings**

The Enquiry Committee visited GCC (W) Mardan on dated 17-01-2022 and the following essential record/documents for checking the authenticity of the appointee in question were demanded from the worthy Principal (current) MsNaseem Begum at GCC (W) Mardan These include:

1. The appointment letter in question.
2. Requisitioning List of the Registered Candidates by the Employment Exchange.
3. Duly signed Minutes of Meeting of the Selection Committee formed for conducting interviews of the candidates mentioning name(s) and Post for which selected.

Of the three aforementioned essential documents, only two i.e. appointment letter and requisitioning list of the eligible candidates from the Employment Exchange was found in the College record. While neither the College concerned nor the Directorate could provide the Minutes of Meeting of the Selection Committee, as these documents were missing from the office record.

Through scrutiny of requisitioning list of the eligible candidates provided by the Manager Employment Exchange, it is disclosed that Ms. Bibi Asma was not one of the eligible candidates. Which means her application was lodged/accepted directly for the said post and was appointed. Which is a clear violation of PHC Judgment dated 03-10-2018, circulated for strict compliance by NAB KP in its letter, circulated vide No. 3/2/Monitoring/A&P/NAB(KP)/401 dated 15 May, 2019 (Sareer Ahmed and others Vs Secretary Government of Khyber Pakhtunkhwa Health Department Peshawar), which says that the appointment should be made only from the requisitioning list of eligible-candidates provided by the Employment Exchange.

Therefore, it can easily be concluded that the appointment made was illegal and void ab initio, as the candidate appointed Ms., Bibi Asma was not from amongst the list of Registered Candidates provided by the Manager Employment Exchange.

**2. HARASSMENT PART OF THE CASE**

COMPLAINT FILED BY MST. HIJAB. REHMAN ASSOCIATE PROFESSOR COMMERCE V/S PROFESSOR MUHAMMAD NADEEM PRINCIPAL GCMS-I BOYS MARDAN UNDER THE PROTECTION AGAINST HARASSMENT OF WOMEN AT THE WORK PLACE ACT 2010.

*Enquiry Report*

*[Signature]*  
**ATTESTED**

*The enquiry committee visited GCC(W) Mardan and GCMS-I Boys Mardan on 17/01/2022. The committee delved into the essence of the matter by interviewing both The Complainant and the accused. Their responses were brought in written form and recorded thoroughly. Their written statements are annexed with the report.*

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Brief facts of the case are under:-

The complaint lodged by Mst. Hijab Rehman Associate Professor GCC(W) Swabi against Professor Muhammad Nadeem Principal GCMS-I Boys Mardan under the protection against harassment of women at work place act 2010 was studied and discussed thoroughly.

**Enquiry Proceedings**

The enquiry committee executed its proceedings on 17/01/2022. A questionnaire was provided to the complainant that sought her responses in written form to furnish her reply for the better understanding of the enquiry committee.

Likewise, Professor Muhammad Nadeem Principal GCMS-I Boys Mardan was interviewed through the provision of a questionnaire that recorded his responses in written form and furnished his reply against the allegations imposed by the complainant.

In reply to the question No.01, she stated under:-

"In my opinion, harassment means to find a soft target and then manipulate it by adopting illegal ways. subject matter of my complaint is discrimination and discrimination is a type of harassment".

In view of the reply to question No. 01, the committee observed that the complainant has tried to define harassment in her own terms that is contradictory to the definition quoted in "protection against harassment of women at work place act 2010. She has stated that discrimination is a sort of harassment but her definition of the term does not meet with the parameters given in the Act of 2010. She has not uttered a single word or quoted a single incident that could qualify the definition of harassment against the accused Professor Muhammad Nadeem Principal GCMS-I Boys Mardan. This bald allegation does not qualify the term harassment nor does her complaint lodged on 09/12/2021 reveal any specific incidents of the harassment. It is just a collection of allegations about not letting her to perform her duties smoothly and conducting a series of enquiries in a fabricated and concocted case.

In view of the contents of the complaint, no specific case is made out to prove the charge of harassment. The complainant has tried to defeat the purpose of departmental enquiry proceedings regarding illegal appointment of one cook Mst. Amina Bibi. Allegations of such nature do not fall within the definition and provisions of protection against harassment of women at work place Act-2010. Allegations of such nature bears long lasting adverse effects on any Government official to make him soupergoat in order to fulfill unlawful objectives through illegal means.

30.1.2022  
30/1/22

  
**ATTESTED**

  
**ATTESTED**





Brief facts of the case are under: -

The complaint lodged by Mst. Hijab Rehman Associate Professor GCC(W) Swabi against Professor Muhammad Nadeem Principal GCMS-I Boys Mardan under the protection against harassment of women at work place act 2010 was studied and discussed thoroughly.

### Enquiry Proceedings

The enquiry committee executed its proceedings on 17/01/2012. A questionnaire was provided to the complainant that sought her responses in written form to furnish her reply for the better understanding of the enquiry committee.

Likewise, Professor Muhammad Nadeem Principal GCMS-I Boys Mardan was interviewed through the provision of a questionnaire that recorded his responses in written form and furnished his reply against the allegations imposed by the complainant.

In reply to the question No. 6 I, she stated under: -

"in my opinion, harassment means to find a soft target and then manipulate it by adopting illegal ways. subject matter of my complaint is discrimination and discrimination is a type of harassment".

In view of the reply to question No. 01, the committee observed that the complainant has tried to define harassment in her own terms that is contradictory to the definition quoted in Protection against harassment of women at work place act 2010. She has stated that discrimination is a sort of harassment but her definition of the term does not meet with the parameters given in the Act of 2010. She has not uttered a single word or quoted a single incident that could qualify the definition of harassment against the accused Professor Muhammad Nadeem Principal (CMS-I Boys Mardan. This bald allegation does not qualify the term harassment nor does her complaint lodged on 09/12/2021 reveal any specific incident of the harassment. It is just a collection of allegations about, not letting her to perform her duties smoothly and conducting a series of enquiries in a fabricated and concocted case.

**ATTESTED**

In view of the contents of the complaint, no specific case is made out to prove the charge of harassment. The complainant has tried to defeat the purpose of departmental the enquiry proceedings regarding illegal appointment of one cook Mst. Amina Bibi. Allegations of such nature do not fall within the definition and provisions of protection against harassment of women at work place Act-2010. Allegations of such nature bears long lasting adverse effects on any Government official to make him scapegoat in order to fulfill unlawful objectives through illegal means.

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Conclusion

Since the enquiry committee has left no stone unturned to look at every aspect of the matter, therefore, it has been concluded that the allegations does not meet with the provisions of the protection against harassment of women at work place Act-2010. Hence, it needs to be discarded.

COMMITTEE

1. Professor Musnif Khan  
Principal (B-20)  
GCMS Thana Malakand/ Chairman
2. Professor Syed Tasdiq Hussain Shah  
Principal (B-20)  
GCMS Mansehra / Member
3. Mrs. Fouzia Burki  
Professor (B-20)  
GCC(W) Dalazak Road Peshawar / Member

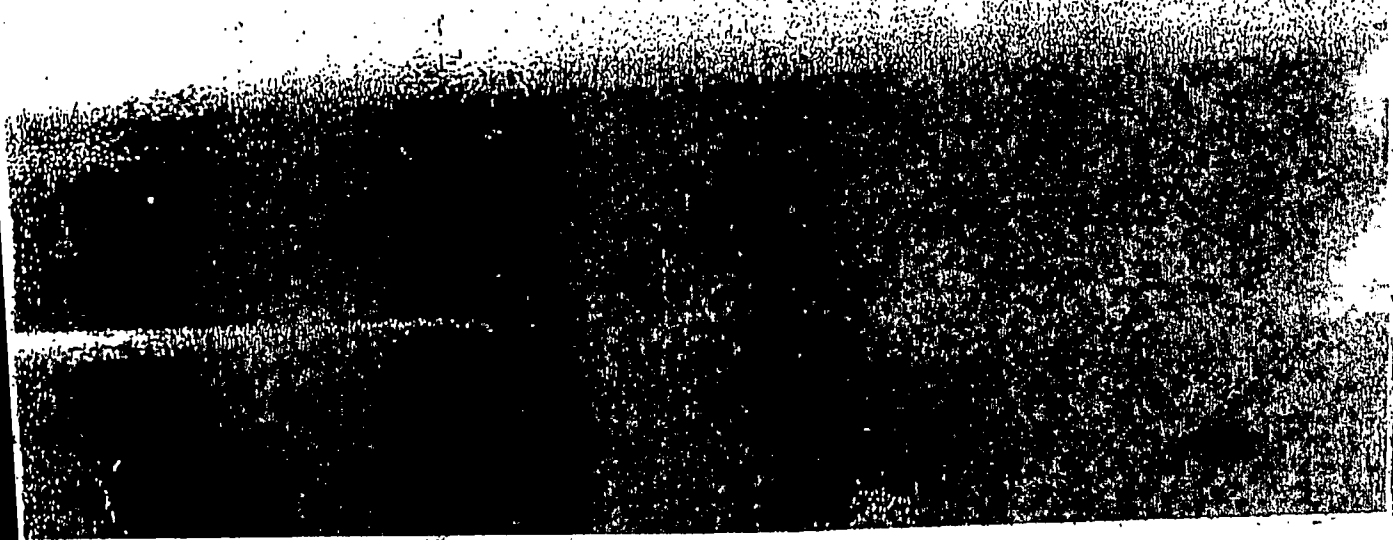
*[Signature]*

*[Signature]* 30/11/20

*[Signature]*  
31/11/20

*[Signature]*  
**ATTESTED**

*[Signature]*  
**ATTESTED**



(62)

Amx - "W"



OFFICE OF THE PRINCIPAL  
GOVT: COLLEGE OF COMMERCE (W) MARDAN.

PHONE NO:-0937-9230090

NO. GCC/(W)/2022/1176

DATED:- 26/03/2022

To,

Mst Bibi Asma,  
Cook,  
GCC (W) Mardan

Subject: Show cause Notice

I am directed to serve a show cause notice regarding the charges mentioned in the attached notice for further necessary action.

*Nasim Akhtar*

Principal  
PRINCIPAL

Govt: College of Commerce (W)  
Mardan

Dated: 26/03/2022

Endst No: GCC (W)/PF/MR/

Copy for information to:

1. DG CE & MS Rano Garhi Peshawar along with a copy of show cause notice
2. Office File

*Rany*  
**ATTESTED**

Principal

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Annex - "w/1"



**OFFICE OF THE PRINCIPAL  
GOVT: COLLEGE OF COMMERCE (W) MARDAN.**

NO: GCC/(W)/2022/1176

Dated: 26-03-2022

**SHOW CAUSE NOTICE**

As per details of the charges framed against you and inquiry conducted by the Directorate of commerce education and management sciences, Peshawar I, Nasim Akhtar principal GCC (W) Mardan, as competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Asma Bibi cook of this:-

Ongoing through the findings and recommendations of inquiry Committee on record including your defense before the said inquiry officers:

I am satisfied that you have committed the following acts/omissions specified in section -03 of the Rules ibid:-

- i. Inefficiency
- ii. Misconduct
- iii. Warning issued from Directorate
- iv. Staff complaints in different times.

As a result, thereof, I, as Competent Authority has tentatively decided to impose upon you the major penalty of "Dismissal from Service" as mentioned in Rule 4(b) (4) of the Rules ibid.

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.

If no reply to this notice is received within seven days of its delivery, in the normal course of circumstances, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

**ATTESTED**

Endst: GCC/ (W)/2022/1176

Copy for information to:

1. PA to Director General DG (CE & MS) HED, KP Peshawar.
2. Director Admin. DG (CE & MS) HED, KP Peshawar.
3. Asma Bibi, (Cook) Class-iv, GCC(W), Mardan
4. Office copy

*Nasim Akhtar*  
PRINCIPAL  
GCC (W) MARDAN  
COMPETENT AUTHORITY  
PRINCIPAL  
Govt: College of Commerce (W)

PRINCIPAL  
GCC (W) MARDAN  
COMPETENT AUTHORITY

(64)

Annex - "X"

To,

The Principal Government College Of  
Commerce (W) Mardan.

Subject: Reply to show cause notice no. GCC/(W)/2022/1176 Dated: 26/03/2022

Respectfully Shweth,

In response to your show cause notice mentioned above  
is as under:-

1. That I have been appointed as cook (Class III) in the your esteemed institution through the legal process and letter of appointment was issued by the competent authority on 20/12/2018. Copy (Attached with)
2. That I was an eligible candidate and the enquiry conducted is wrong illegal against the law.
3. That complaint lodged by ~~me~~ Mst. Rukhsana Begum was not a candidate for such post so having no locus standi to file complaint. Copy attached with
4. That the selection committee after going through all the formalities, appointed me against such post (EPS-03) as cook in this esteemed institution.
5. That I have done my duty with due diligence and conscience since 2018 till today.
6. That such like complaints against me cannot be entertained because the appointment committee who has appointed <sup>me</sup> can remove me otherwise its Courts Jurisdiction may.

  
ATTESTED

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- 7. That appointing authority has to be constituted again for such removal.
- 8. That you the Principal of Government college of commerce (W) have no authority or power to remove me or dismiss me otherwise.
- 9. That in your show cause Notice no charges for inefficiency, misconduct has been levelled nor proved in the Enquiry Report.
- 10. That any action taken against me under such grounds will be illegal against the law and Justice and I shall have recourse to court of Law against you. Thanking You

Dated:

Yours Obediently

Hst. BIBI ASMA

Bibi Asma

2-4-2022

copy to:

- 1) DG (CE&MS) HED, KP PESHAWAR.
- 2) Director Admin DG (CE&MS) HED, KP PESHAWAR
- 3) office copy.



ATTESTED

(66)

Annex - "Y"

OFFICE OF THE PRINCIPAL  
GOVT: COLLEGE OF COMMERCE (W) MARDAN.  
PHONE NO: 0937-848198

NO. GCC/(W)/2022/

Dated: / /2022

OFFICE ORDER:

1. Whereas Mst. Bibi Asma was appointed as Cook BPS-03 for GCC (W) Mardan vide letter No GCC (W) MRD/dated 20-12-2018.
2. Whereas Mrs Rukhsana Begum who was also candidate for the said post at that time lodged in complaint with the Principal GCC(W) Mardan wherein the legality of Asma Bibi appointment was challenged vide application dated 17-11-2021.
3. Director General Commerce Education & Management Sciences KP, constituted a committee vide letter No DGCE&MS/Admn/Inquiry/Gen/1253 (1-7) dated 06-01-2022. The committee comprised of three BPS-20 officers who submitted inquiry report to Director General on 31-01-2022.
4. The inquiry report concluded that the appointment made was illegal and void ab initio as the candidate's name was not in any list of registered candidates provided by Manager Employment Exchange.
5. Whereas Mst. Asma Bibi was issued show cause notice vide letter No GCCW/2022/1176 dated 26-03-2022 wherein with respect to the charge of misconduct (because of her illegal appointment), and inefficiency ( because of other lapses ), she was asked to clarify her position.
6. Whereas she could not clarify her position with respect to her illegal appointment (misconduct).
7. Consequent upon the finding of inquiry report reply of the accused employec and available record, the undersigned being Competent Authority has dismissed Mst. Asma Bibi the Cook BPS-03 from the present position.



**ATTESTED**

Principal

NO. GCC (W)/MRD/ 1192 (1-5)

Dated: 12.104 2022

Copy Forwarded to:

1. PA to DG CE & MS KP, Peshiwar
2. Accountant General Khyber Pakhtunkhwa
3. District Account Office Mardan
4.  Mst. Asma Bibi
5. Office File

*Nasim Akhtar*  
PRINCIPAL  
Govt. Commerce College  
(Women) Mardan.

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To,

**The Director General  
Commerce Education & Management Sciences  
Khyber Pakhtunkhwa.**

**Departmental Appeal against illegal dismissal Order No.GCC (W)/MRD/ 1192(1-5) dated 12.04.2022, for discrimination, violation of fundamental right and non observance of real facts of the appellant, hence on the complaint of one Mrs. Rukhsana Begum the present appellant was dismissed from her service without any cogent reason and dismissal order of the appellant was passed in a hurried manner without any lawful authority.**

.....

**RESPECTED SIR!**

Appellant submits as under:

1. That the Appellant was appointed as Cook (BPS-3) by your worthy department through letter Endst. No. GCC/W/MRD/CLASS- IV/659 (1-5) on dated 20.12.2018 and since then has performed her duties with honesty and full devotion and has been a responsible, hard worker, skillful, dutiful, punctual and obedient Cook. (Copy of the Appointment Letter Endst. No. GCC/W/MRD/CLASS- IV/659 (1-5) dated 20.12.2018 is annexed).
2. That the Government of Khyber Pakhtunkhwa Technical Education & Vocational Authority, KP-TEVTA Employment Exchange Essential Personnel Registration Certificate was issued to appellant on dated 26.11.2018 whereby she was registered at the Employment Exchange and a registration number FP/TS/223/2018 was issued to her.(Copy of Government of Khyber Pakhtunkhwa Technical Education & Vocational Authority, KP-TEVTA Employment Exchange Essential Personnel Registration Certificate is annexed).
3. That the appellant has neither committed any misconduct, nor she was inefficient but despite the fact your worthy office has sent the appellant with a show cause notice, without any cogent reason and violating the law by ignoring the performance of the appellant, which is a clear violation of law and fundamental rights.
4. That even the enquiry committee did not observe the real facts of the appellant who was legally appointed for the said by fulfilling all legal formalities.
5. That despite the fact that appellant worked for more than three years and 4 months for the said post hence entertaining a

ATTESTED



complaint from an outsider Mst. Rukhsana at this stage is against appellant basic rights.

- 6. That your August office has not observed the appellant dismissal in accordance with her present and previous better performance and for the betterment of the public interest So Appellant has not been treated in accordance with law, and appellant rights secured and guaranteed under the law and constitution have been violated.
- 7. That the discrimination as observed by this office with Appellant is highly deplorable and condemnable, being unlawful, unconstitutional, without lawful authority, without jurisdiction, against the norms of natural justice, equity and against the law on subject, hence liable to be declared void ab initio.
- 8. That the act of your good office not considering the best performance of the appellant and her selection on merit is against law and is based on malafide, and ulterior motive.
- 9. That the action on the part of your good office has been affecting adversely appellant good performance and her good character as protected by the constitution and the Appellant may not be dismissed from the current post of Cook in the best public interest and as such to equally deal in accordance with the law and rules.

*It is therefore, most humbly prayed that on acceptance of the instant appeal an appropriate direction may please be issued and the dismissal order of the Appellant may kindly be cancelled and any other relief not specifically prayed and to which the Appellant is found entitled may also be granted.*

DATED:20.04.2022

Appellant *Bi Bi Asma*

Bibi Asma (Cook) Class IV GCC(W) Mardan.

**ATTESTED**

To,

69

The Principal  
Govt. College of Commerce for Women Mardan.

Departmental Appeal against illegal dismissal Order No.GCC (W)/MRD/1192(1-5) dated 12.04.2022, for discrimination, violation of fundamental right and non observance of real facts of the appellant, hence on the complaint of one Mrs. Rukhsana Begum the present appellant was dismissed from her service without any cogent reason and dismissal order of the appellant was passed in a hurried manner without any lawful authority.

.....

**RESPECTED SIR!**

Appellant submits as under:

1. That the Appellant was appointed as Cook (BPS-3) by your worthy department through letter Endst. No. GCC/W/MRD/CLASS- IV/659 (1-5) on dated 20.12.2018 and since then has performed her duties with honesty and full devotion and has been a responsible, hard worker, skillful, dutiful, punctual and obedient Cook. (Copy of the Appointment Letter Endst. No. GCC/W/MRD/CLASS- IV/659 (1-5) dated 20.12.2018 is annexed).
2. That the Government of Khyber Pakhtunkhwa Technical Education & Vocational Authority, KP-TEVTA Employment Exchange Essential Personnel Registration Certificate was issued to appellant on dated 26.11.2018 whereby she was registered at the Employment Exchange and a registration number FP/TS/223/2018 was issued to her.(Copy of Government of Khyber Pakhtunkhwa Technical Education & Vocational Authority, KP-TEVTA Employment Exchange Essential Personnel Registration Certificate is annexed).
3. That the appellant has neither committed any misconduct, nor she was inefficient but despite the fact your worthy office has sent the appellant with a show cause notice, without any cogent reason and violating the law by ignoring the performance of the appellant, which is a clear violation of law and fundamental rights.
4. That even the enquiry committee did not observe the real facts of the appellant who was legally appointed for the said by fulfilling all legal formalities.

  
**ATTESTED**

(70)

5. That despite the fact that appellant worked for more than three years and 4 months for the said post hence entertaining a complaint from an outsider Mst. Rukhsana at this stage is against appellant basic rights.
6. That your August office has not observed the appellant dismissal in accordance with her present and previous better performance and for the betterment of the public interest So Appellant has not been treated in accordance with law, and appellant rights secured and guaranteed under the law and constitution have been violated.
7. That the discrimination as observed by this office with Appellant is highly deplorable and condemnable, being unlawful, unconstitutional, without lawful authority, without jurisdiction, against the norms of natural justice, equity and against the law on subject, hence liable to be declared void ab initio.
8. That the act of your good office not considering the best performance of the appellant and her selection on merit is against law and is based on malafide, and ulterior motive.
9. That the action on the part of your good office has been affecting adversely appellant good performance and her good character as protected by the constitution and the Appellant may not be dismissed from the current post of Cook in the best public interest and as such to equally deal in accordance with the law and rules.

*It is therefore, most humbly prayed that on acceptance of the instant appeal an appropriate direction may please be issued and the dismissal order of the Appellant may kindly be cancelled and any other relief not specifically prayed and to which the Appellant is found entitled may also be granted.*

DATED: 20.04.2022

  
**ATTESTED**

APPELLANT Bibi Asma

Bibi Asma (Cook) Class IV GCC(W) Mardan.

CNIC: 16161-0490466-8


Cell No. 0318-9680531

(71)

Muhammad Usama Assistant (CC) Masdar

received departmental Appeal 1.8.0

Bibi Asma Submitted by her by hand  
to me RA 23-04-2022



Assistant  
CC (w) Masdar



ATTESTED

قیمت 50 روپے	32048			
ایڈوکیٹ: عبدالرحمن احمد		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: 10-0611				
رابطہ نمبر: 03005991598				

بعدالت جناب: خیبر پختونخواہ سروس ٹریبیونل پشاور

منجانب: اپیلانٹ	دعویٰ:
 بی بی اسماء حکومت خیبر پختونخواہ	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
 آن مقام پشاور کیلئے عبدالرحمن احمد لکھنوی کو وکیل مقرر  
 کر کے قرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زرین لکھنے و دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور غلطی، نیز  
 دائرہ کے اپیل گرانے و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کارروائی 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 با اختیار حاصل ہوں گے اور اس کا سہارا ختم پر داخلہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جائزہ التوائے 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

المقوم:   
 PESHAWAR BAR ASSOCIATION  
 KHYBER PAKHTOONKHWA

پشاور کے لیے منظور ہے  
 Attest  
 Agent  
 مقام پشاور

نوٹ: اس وکالت نامہ کی فونڈ کا پی تا قابل قبول ہوگی۔

Bi Bi Asma  
 بی بی اسماء دختر ہر محمد سیدہ کابونی ناو دہی ڈرائی نہ طور وکیل پشاور  
 16101-0490466-8