

Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	02.09.2019	<p align="center"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> <u>At Camp Court, Swat.</u> Service Appeal No. 755/2018</p> <p>Date of Institution 30.05.2018 Date of Decision 02.09.2019</p> <p>Qurish Khan Ex PST Government Primary School Nagri, District Buner.</p> <p align="right">Appellant</p> <p align="center">Versus</p> <ol style="list-style-type: none"> District Education Officer (M) Buner. Director E&SE Khyber Pakhtunkhwa, Peshawar. Government of Khyber Pakhtunkhwa, through Secretary E&SE Khyber Pakhtunkhwa, Peshawar. SDEO, Mandanr District Buner. Head Teacher GPS Nagrai District Buner. <p align="right">Respondents</p> <p>Mr. Muhammad Hamid Mughal-----Member(J) Mr. Ahmad Hassan-----Member(E)</p> <p align="center"><u>JUDGMENT</u> <u>MUHAMMAD HAMID MUGHAL, MEMBER:</u> Appellant</p> <p>with counsel present. Mr. Mian Amir Qadir learned Deputy District Attorney present.</p> <p>2. The appellant (Ex-PST) has filed the present service appeal against the order dated 20.01.2018 whereby the appellant was awarded major penalty of compulsory retirement from service w.e.f 01.07.2016 alongwith recovery of amount of Rs. 412885/-.</p>

2.9.2019

3. Learned counsel for the appellant argued that the appellant was appointed as Primary School Teacher on 03.10.1988; that in the month of May 2016 the appellant became unable to perform his duties due to his illness hence he filed application through proper channel/headmaster, for his retirement; that the headmaster informed the appellant that he has been relieved from duty in pursuance of his application for retirement and as such the appellant was under impression that he has been relieved/retired; that son of the appellant inquired about the pensionary benefits of the appellant however he was told that due to discrepancy in the date of birth of the appellant in his documents i.e. CNIC and Service Book, the sanction for retirement was not granted; that thereafter the appellant decided to join back his duties but the headmaster concerned did not allow the appellant to do so; that a fact finding inquiry was conducted against the appellant at his back; that the appellant was served with Show Cause Notice which the appellant also replied; that without issuing any charge sheet/statement of allegation i.e. without conducting any regular inquiry, the appellant was awarded punishment of compulsory retirement vide order dated 20.01.2018 alongwith recovery of Rs. 412885/-. Learned counsel for the appellant next contended that the departmental appeal of the appellant against the impugned order, was not answered; that the impugned order is against law, facts and norms of justice.

4. As against that learned Deputy District Attorney stated that the appellant submitted application for his retirement to the

2.9.2019

headmaster instead of competent authority and that the application was then taken back; that the competent authority conducted inquiry against the appellant and in the light of the said inquiry, the appellant was awarded punishment of compulsory retirement; that proper Show Cause Notice was issued to the appellant; that the appellant absented himself from duty and illegally received salary of absence period hence the order made impugned in the present service appeal is legally justified.

5. Arguments heard. File perused.

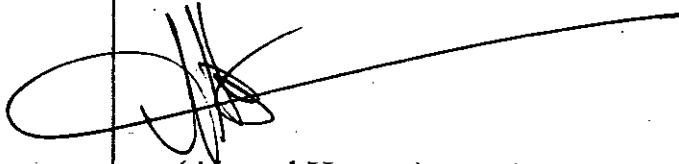
6. There is no denying fact that the appellant has more than 25 years of service at his credit. In the year 2016 the appellant submitted application for his retirement on the ground of his illness and even today, before this Tribunal the appellant expressed his desire for retirement on the ground of his illness.

7. The competent authority without conducting any regular inquiry under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, compulsory retired the appellant by way of major punishment. Learned Deputy District Attorney remained unable to show that in fact any charge sheet/statement of allegation were served upon the appellant, similarly learned Deputy District Attorney could not demonstrate that a fact finding inquiry can be made basis for awarding major punishment.

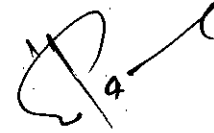
8. In the light of above, the present service appeal is accepted and the case of the appellant is remitted to the competent authority

2.9.2018

for decision afresh after de-novo inquiry in accordance with law. Issue of back benefit shall be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.



(Ahmad Hassan)
Member





(Muhammad Hamid Mughal)
Member
Camp Court, Swat.

ANNOUNCED
02.09.2019

11.06.2019


Counsel for the appellant and Mr. Mian Ameer Qadir, learned District Attorney alongwith Mr. Obaid-ur-Rehman, ADO for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 02.09.2019 before D.B at Camp Court Swat.

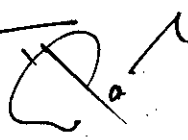

(M. Amin Khan Kundi)
Member
Camp Court Swat


(M. Hamid Mughal)
Member
Camp Court Swat

02.09.2019

Appellant present. Learned counsel for the appellant present. Mr. Mian Amir Qadir learned Deputy District Attorney present. Vide separate judgment of today of this Tribunal placed on file, the present service appeal is accepted and the case of the appellant is remitted to the competent authority for decision afresh after de-novo inquiry in accordance with law. Issue of back benefit shall be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.


(Ahmad Hassan)
Member



(Muhammad Hamid Mughal)
Member
Camp Court, Swat

ANNOUNCED.
02.09.2019

06.02.2019

Clerk to counsel for the appellant and Mian Amir Qadar learned Deputy District Attorney present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 06.03.2019 before D.B at camp Court Swat.


Member

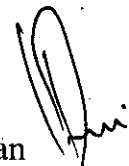

Member
Camp Court Swat.

06.03.2019

Mr. Raees Khan son of appellant and Mian Amir Qadir, District Attorney alongwith Ubaidur Rahman, ADO for respondents present.


Rejoinder to the comments of respondents has been submitted which is placed on file. To come up for arguments before the D.B on 03.04.2019 before the D.B at camp court, Swat.

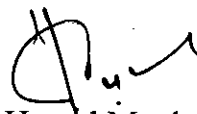

Member


Chairman
Camp Court, Swat

03.04.2019

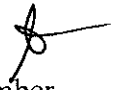
Counsel for the appellant and Mr. Mian Ameer Qadir, District Attorney alongwith Mr. Obaid-ur-Rehman, ADO for the respondents present. Learned counsel for the appellant submitted additional documents, placed on file and seeks adjournment. Adjourn. To come up for arguments on 11.06.2019 before D.B at Camp Court Swat.


(M. Amin Khan Kundi)
Member
Camp Court Swat


(M. Hamid Mughal)
Member
Camp Court Swat

01.10.2018

Clerk of counsel for the appellant present. Mr. Usman Ghani, District Attorney for the respondents present. Written reply not submitted. Learned District Attorney sought some time to submit the same on the next date. Case to come up for written reply/comments on 06.11.2018 before S.B at camp court Swat.



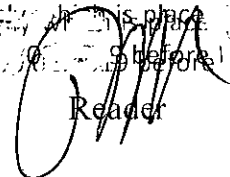
Member
Camp Court Swat

06.11.2018

Due to retirement of the Hon'ble Chairman Service Tribunal is incomplete. Tour to Camp Court Swat has been cancelled. To come up for the same on 05.12.2018 at camp court

~~05.12.2018~~
05.12.2018

~~Appellant in person. Mr. Usman Ghani learned District Attorney alongwith Mr. Ubaid Ur Rehman ADO litigation for the respondents present. Representative of the respondents submitted written reply which is placed on file. Adjourn. To come up rejoinder if any arguments on 06.02.2019 before D.B at Camp Court Swat.~~



Reader

Member
Camp Court Swat

05.12.2018

Appellant in person. Mr. Usman Ghani learned District Attorney alongwith Mr. Ubaid Ur Rehman ADO litigation for the respondents present. Representative of the respondents submitted written reply which is placed on file. Adjourn. To come up rejoinder if any arguments on 06.02.2019 before D.B at Camp Court Swat.



Member
Camp Court Swat

06.07.2018

Appellant Quresh Khan in person alongwith his counsel Mr. Mushtaq Ahmad Khan, Advocate present. Preliminary arguments heard.

Contends that appellant has been compulsory retired from service in violation of law as neither any reason was shown nor personal hearing was given to him.

Points raised need consideration. The appeal is admitted for regular hearing, subject to all legal objections, if raised by the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 03.09.2018 before S.B at camp court, Swat.

Appellant Deposited
Security Process Fee

Chairman
Camp court, Swat

03.09.2018

Appellant Qurish Khan in person present. Mr. Usman Ghani, District Attorney for respondents present. Written reply on behalf of respondents not submitted. Requested for adjournment. Granted. Case to come up for written reply/comments on 01.10.2018 before S.B at camp court Swat.

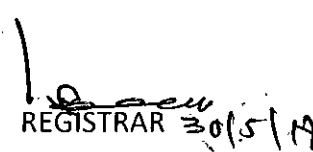

(AHMAD HASSAN)
MEMBER
Camp Court Swat

Form -A

FORM OF ORDER SHEET

Court of _____

Case No. _____ 755/2018 _____

S.No.	Date of Order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	30/05/2018 31-05-2018	<p>The appeal of Mr. Qurish Khan presented today by Mr. Mushtaq Ahmad Khan Advocate may be entered in the Institution register and put up to the Wrothy Chairman for proper order please.</p> <p style="text-align: right;">  REGISTRAR 30/5/18 </p> <p>The case is entrusted to Touring S.P Bench at Swat for preliminary hearing to be put up there on- <u>06-07-2018</u></p> <p style="text-align: right;">  CHAIRMAN </p>

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....755.....2018

Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant


Vs

District Education officer(M) Buner and others.....respondents

Index

S NO	Description of documents	Annextures	Pages
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2	Affadavit		5
3	Adresses of parties		6
4	Stay application along with affidavit		7-8
5	Application for retirement	"A"	9
6	Extract of register Mudarriseen	"B"	10
7	Application for resuming duties	"C"	11
8	Application under right to information act along with p/o receipt.	D	12-14
9	Showcause notice dated 14.11.2017	"E"	15
10	Reply to showcause along with p/o receipt.	"F"	16-18
11	Impugned order dated 20.1.2018	G	19
12	Departmental appeal dated 6.2.2018	H	20-22
13	Court fee		
14	Wakalat nama		23

Dated: 30 /05/2018

Petitioner
Through 
Mushtaq ahmad khan
Office at district court
daggar,buner
Cell no

①

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....755.....2018

Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant

Khyber Pakhtukhwa
Service Tribunal

Vs

Diary No. 1019

Dated 30-5-2018

1. District Education officer(M) Buner .
2. Director E & SE khyber pukhtoonkhwa at Peshawar.
3. Govt of K.P.K through secretary E & SE khyberpukhtoonkhwa at Peshawar.
4. SDEO Mandanr district buner.
5. Head teacher GPS Nagrai district Buner.

Appeal against the impugned order dated 20/1/2018 whereby the respondent No 1 compulsorily retired the appellant from service with effect from 1. 7. 2016 and directed recovery of RS 412885 from him.

Respectfully sheweth:

1. That the appellant was appointed as primary school teacher on 3. 10. 1988 and since then he was performing his duties efficiently,with full zeal and devotion.
2. That the appellant remained in the aforesaid service for about 28 years with unblemished service record and never ever absented from his duty and it is evident from his service record that he remained on leave for only 59 days in the whole of his service.
3. That in may 2016 the appellant became ill due to which he was unable to perform his duties and hence filled an application, through proper channel, for his retirement.(application for retirement attached as annex A)
4. That the head teacher informed the appellant that he had been relieved from duty pursuant to his application for retirement where after the appellant did not perform the duties for several days under the bonafid

Filed to-day
30/5/18
Registrar

belief that he had been relieved/retired .(extract of register mudariseen attached as annex B)

5. That after few months the son of the applicant went to the office of the respondent No 1 for information of retirement benefits etc but he was told that due to the difference between the date of birth of the appellant in CNIC and service book the retirement sanction had not then granted and also told him that after solving this legal issue they were going to grant retirement sanction, however they did not later on communicated the information of rejecting of his application for retirement.
6. That when the appellant came to know regarding the above mentioned facts he joined his duties but the headmaster concerned was not allowing the appellant to record his attendance as his stance was that, that the appellant had already been relieved by him, similarly the respondent no 4 was also approached but he also did not settle the issue .
7. That the applicant then filed an application before the respondent No 1 for formally resuming his duties when came to know regarding rejection of his application for retirement.(copy of the application for resuming duties attached as annex C)
8. That the appellant time and again requested the respondents for formally allowing him to resume his duties as his health was also sound then, but despite the appellant's attending the school the respondent did not allow him for recording his formal attendance with malafide intention.
9. That the appellant came to know that a fact finding inquiry had been conducted at his back without issuance of any show cause notice to the applicant, hence he filed an application for providing the inquiry, if any, under Right to information act 2013 on 14.11.2017, but no such inquiry was provided to the appellant.(application dated 14.11.2017 under right to information act attached as annex D)
10. That on the same day i.e. 14.11.2017, the appellant was served with a show cause notice which was properly replied by the appellant.(copy of the show cause notice and reply thereto are attached as annex E & F)
11. That without providing any charge sheet, statement of allegation, final show cause notice and conducting inquiry the respondent no 1 passed the

impugned order dated 20/1/2018 where by the appellant was compulsorily retired from service with recovery of amount Rs 412885, hence a departmental appeal ,dairy No 141 dated 6.2.2018 was filled before the appellate authority but the same was not decided within the statutory period.(impugned order dated 20.1.2018 and departmental appeal attached as annex G and H).

GROUND:

1. That the impugned order dated 20.1.2018 is against the law, rules and natural justice.
2. That the appellant have neither been charge sheeted nor any statement of allegation have been communicated to him. more over no regular inquiry have been conducted nor the appellant have been heard in the matter and the whole proceeding have been done it the back of the appellant on which score the impugned order is illegal and unjustified.
3. That the appellant have neither been associated with any inquiry nor any final show cause notice have been send to him and he has been completely condemn unheard.
4. The the procedure contained in efficiency and discipline rules ,2011 has not been followed rather the process/procedure adopted by the respondents is contrary to the law on the subject hence liable to be set aside.
5. That the appellant have not been treated according to the law applicable to the civil servants, hence the impugned order is against the spirit of the law.
6. That returning of the retirement application of the appellant on the ground of wrong date of birth in the CNIC and service book had not been communicated to the appellant by the respondents. hence the appellant could not be penalized for the same. more over the respondent no 5 had not communicated the retirement application to the respondent no 1 in time and in the same way had not communicated to the appellant the returning of the retirement application by the respondent no 1 with malafide intention and he also adopted the role of competent authority by relieving the appellant and then by not allowing him to his duties but no departmental action have been initiated against the respondent no 5 which

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show the discriminatory treatment and unfair play on the part of respondent no 1.

7. That the respondent have penalized the appellant for their own wrongs which penalty is not sustainable in the eye of law.
8. That the appellant seek the permission of this worthy tribunal to rely on additional grounds at the time of arguments.

It is therefore kindly prayed that on acceptance of this appeal the impugned order dated 20/1/2018 may kindly be set aside and the appellant be re instated in service with all back benefits.

Any other relief not specifically prayed for and which this worthy tribunal deem fit and appropriate in the facts and circumstances of the instant case may also kindly be granted for the end of justice.

Dated: 30/5/2018

Appellant 

Through 

Mushtaq Ahmad Khan Alizai

Advocate, office district court

Buner. cell No 03469014199.

5

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....2018

Qurish khan Ex PST Government primary school Nagrai,district

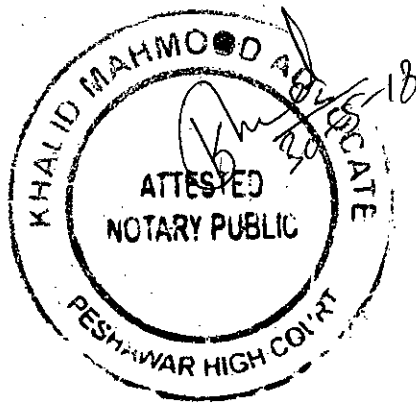
Buner.....appellant

Vs

District Education officer(M) Buner and others.....respondents

AFFIDIVET

I Qurish khan EX PST govt primary school nagrai district buner, do hereby solemnly affirm and declare on oath that the contents of the instant service appeal is correct to the best of my knowledge and belief & nothing has been concealed from this worthy tribunal.



Qurish Khan
Deponent

5

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....2018

Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant

Vs

District Education officer(M) Buner and others.....respondents

Addresses of parties

petitioner

Qurish khan Ex PST Government primary school Nagrai,district Buner,cell No
03429475265.

respondents

1. District Education officer(M) Buner .
2. Director E & SE khyber pukhtoonkhwa at Peshawar.
3. Govt of K.P.K through secretary E & SE khyberpukhtoonkhwa at
Peshawar.
4. SDEO Mandanr district buner.
5. Head teacher GPS Nagrai district Buner.

Appellant

Through



Mushtaq Ahmad khan alizai

Advocate,office district court

Buner.cell No 03469014199.

7

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....2018

Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant

Vs

District Education officer(M) Buner and others.....respondents

Application for suspension of the impugned order dated 20.1.2018

Respectfully sheweth,;

1. That the titled service appeal is filed before this worthy tribunal in which no date has been fixed till yet.
2. That there exist a strong prima facie case in favor of the appellant and the appellant will face inconvenience and irreparable loss if the impugned order is not suspended till the final disposal of the instant appeal.
3. That the contents of the main appeal may kindly be considered par and parcel of the instant application.

It is therefore kindly prayed that on acceptance of this application the impugned order dated 20.1.2018 may kindly be suspended till the final disposal of the appeal.

Appellant

Through



Mushtaq Ahmad khan alizai

Advocate,office district court

Buner.cell No 03469014199.

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Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....2018

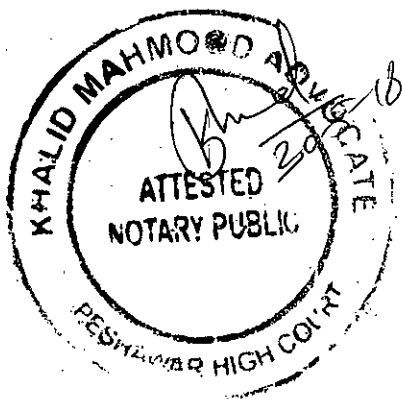
Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant

Vs

District Education officer(M) Buner and others.....respondents

AFFIDIVET

I Mushtaq Ahmad khan advocate as per instruction of my client do hereby solemnly affirm and declare on oath that the contents of the instant application is correct to the best of my knowledge and belief & nothing has been concealed from this worthy tribunal.



Deponent

(9)

Annex A³

(4)

عنوان: ریٹائرمنٹ جرائے پی ایس پی ٹی پوسٹ 107/01 سے

جناب عالی!

خود بانہ گزارش ہے کہ میں بحیثیت پی ایس پی ٹی وارڈن

03/88 سے اپنے فرائض منصبی انجام دے رہا ہوں

میں نے اپنے ملازمت کے 28 سال پورے کر لیے اور اس

کے علاوہ میں بیمار بھی ہوں میں مزید سروس جاری
نہیں رکھ سکتا۔

لینڈا آپ صاحبان سے مالی کٹے کے لیے 01/07/2016 سے سکھوش کر رہا ہوں

دعا گوہ رہنمائی

فقط

آپ کا عبد اللہ

فریش خان پی ایس پی ٹی ٹاؤن شپ ٹی ایچ ڈی

01-07-2016

جناب عالی!

attested
accepted
(Signature)

درخواست حقیقت پر مبنی ہے
خود بانہ عرض ہے کہ میں نے
Head Master
GPS Nagrai
GPS-15 Distt. Buner
11/7/16

بابت ماہ جولائی سال 2015

چیسٹر حاجی خیری مدرسیہ

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Headmaster

15/7/15

Head Master

17/7/15

attested

رجسٹر حاضری مدرسین

مدرسه ابتدائی اسلامیہ کراچی - بابت ماہ اگست ۱۹۵۱ء

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03469441522			03449641821			03469441522		
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11

حضرت جناب ڈی ای او صاحب - ایگزیکٹو ایڈیٹر سیکنڈری ایجوکیشن (سرڈان) ضلع بونیر

عنوان: درخواست مجدد زبردفعات رائٹ ٹو الفارمیشن ایکٹ 2013ء

سائل حسب ذیل عرض رسال ہے!

جناب والا:

۱۔ یہ کہ سائل حکمہ ہڈا میں 10/03 کو بحیثیت مدرس بی ایس ٹی بھرتی ہوا ہے۔ اور تب سے زوال

منصبی بطریق احسن انجام دے رہا ہے۔ اور 28 سال اپنی مدت ملازمت پوری کر چکا ہے۔

۲۔ یہ کہ سائل 07/2016 کو بہ امر جنوری بوجہ بیماری ریٹائرمنٹ کیلئے ایک درخواست گزاری جس

کو ہیڈ ماسٹر صاحب نے اپنے اختیارات کا غلط استعمال کرتے ہوئے مجھے رخصت کیا۔ جبکہ قانون کے مطابق

ہیڈ ماسٹر صاحب نہ تو سائل Competent Authority ہے۔ اور نہ ہی قانون نے اسے درخواست منظور

کرنے کا اختیار دیا ہے۔

۳۔ یہ کہ سائل کی درخواست کو ہیڈ ماسٹر صاحب نے Competent اتھارٹی کو ارسال کرنے خود ہی منصب بن

بیٹھا۔ جسکی نااہلی کی وجہ سے ایک تکنیکی مسئلہ بن گیا۔ اور معاملہ الجھ گیا۔

۴۔ یہ کہ سائل باقاعدہ سکول میں حاضر ہوتا رہا۔ کیونکہ اس کی درخواست پر ابھی تک کوئی عمل نہیں ہوا

تھا۔ لیکن ہیڈ ماسٹر صاحب حاضری لگانے سے سائل کو منع کرتا رہا۔

accepted
No

No-1466

22-11-2017

Handwritten signature or initials at the bottom center of the page.

5. یہ کہ اس کے بعد محکمہ جواز نے حالات و واقعات کو مد نظر رکھ کر سیرا پانٹ انکوائری کا حکم دیا۔ جو کہ سابقہ اطلاع کے مطابق مکمل ہو چکی ہے۔ اور انکوائری کمیٹی نے اپنے سفارشات محکمہ جواز کو ارسال کی ہے

6. یہ کہ قانون کے مطابق سائل کے معاملے میں جو انکوائری ہوئی ہے۔ اس کی مکمل فائل وغیرہ تک رسائی

سائل کا ناقابل تردید حق ہے۔ تاکہ سائل اپنے حق کا قانونی دفاع کر سکے۔

اس لیے استدعا کی جاتی ہے کہ سائل کو درج خواہش سے لیکر مکمل انکوائری بمعہ سفارشات اور

اگر اس کیس سے متعلق تمام دستاویزات قانون ذکر شدہ میں دیئے گئے وقت میں دینے کے احکامات

جاری فرمایا جائے۔ تاکہ سائل اپنے قانون حق کا دفاع بطور احسن کر سکیں۔

العارض

عین لوازس ہوگی۔ فقط

قریش خان

14/11/2017

attested &
accepted



14

~~14~~

No. 1466 For Insurance Notices see reverse. Rs. Ps.
 Stamps affixed except in case of
 uninsured letters of not more than
 the initial weight prescribed in the
 Post Office Guide or on which no
 acknowledgement is due.


Received a registered addressed to _____ Date-Stamp _____

Initials of Receiving Officer _____ Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____ (in words) _____

If insured. { Insurance fee Rs. _____ Ps. _____ (in words) } Weight { Kilo _____ Grams _____

Name and address of sender _____

attest d


Reg.

(15)

Ann 'E'

(10)

SHOW CAUSE NOTICE

I Mr. Bakht Zada District Education Officer (M), as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you, as follows.

I am satisfied that you have committed the following acts / omissions specified in rule 3 of the said rules;

- (a) You, Mr. Quraish Khan PST GPS Nagrai was found guilty of absenteeism, inefficiency and misconduct.
- (b) Time and again you were reported absent from your duty by the SDEO(M) Mandanr.
- (c) You were found guilty of absenting himself from duty
- (d) You are not interested in Govt; duty.

Consequently a comprehensive /detail enquiry was conducted against you which proved the charges of continuous absence and embezzlement of Rs.412885/- against you.

1. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major/minor penalties, under rule 4 of the said rules.
2. You are, thereof, required to show cause as to why the one of the major penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
3. If no reply to this notice is received within seven days of not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.


(BAKHT ZADA)

DISTRICT EDUCATION OFFICER (M)
BUNER.

Endstt: No 6425-28 Dated 14/11/17

Copy of the above is forwarded for information to the

1. Deputy Commissioner Buner
2. District Monitoring Officer Buner
3. Sub Divisional Education Officer (M) Mandanr Buner.
4. Official concerned.

attested



DISTRICT EDUCATION OFFICER (M)
BUNER.

16

Ann "F"
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WRITTEN REPLY OF SHOWCAUS NOTICE NO:6425-28 (14-11-2017) ON BEHALF OF UNDERSIGNED (MR. QURAIKH KHAN) PST GPS NAGRAI.

Respectfully Sheweth,

Brief Facts/History before para-wise relay to the show cause.

1. That the undersign has been appointed as PST on 03-10-1988 and since that he is serving his duty honestly and with full efficiency.
2. That the applicant during his whole career of service i.e. in 28 years only for 59 days have remained on casual leaves which is the clear proof of my duty fullness.
3. That the applicant due to his serious illness on 01-07-2016 filed a written application for his retirement to the Head teacher of GPS Nagrai who assured me that he will forward my application to the concern authority/ office i.e. before your kind ship.
4. That the under signed was informed by the Head teacher that your application has been forwarded and you have been retired from duty and also the said Head teacher effected writing in the concern register which is attached as a proof.
5. That the Head teacher with malafide intension did not forward the said application bet retained it with him in the school for Ten days.
6. That after 10 days' application was forwarded to the office i.e. to your kindness but the application was returned by the competent authority due to the difference of age (date of birth) of the applicant in CNIC and service book and directions were made that the application should be filed after correction of date of birth but the whole process was kept hid e from the applicant by the Head teacher namely Fazal Qayoom.
7. That the applicant was seriously ill and was unable to pursue his application therefore the son of the applicant went to the office for information.

at 5 Feb
M

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8. That in the office, the son of the applicant informed that the application has been returned and there after I received my salaries and also attended the school for my duty but the Head teacher who was bias to me without any authority did not permit me to my duty and also did not make any attendance.
9. That the applicant time and again went to the Head teacher and also to the ESDO Mandanr but no fruitful solution was made.
10. That the applicant also informed your kindness but then also any necessary steps were not taken.
11. That your kindness also referred the matter for inquiry but up till now no inquiry report has been delivered to me and the office is reluctant to handover the copy of inquiry report which is against the facts.
12. That the Show Cause Notice is against the Law and facts and rules, so may kindly be dismissed.

It is therefore, humbly prayed that the show Cause Notice may kindly be withdrawn and the case of the undersigned may kindly be disposed of amicably.

Thanks

Your faithful

Quarish Khan PST.

(Signature)

29.11.2017
Dir No 630

(Signature)
Atst

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DB

No. 1554

For Insurance Notices see reverse. Stamps affixed except in case of un-insured letters of not more than the initial weight prescribed in the Post Office Guide or on which no additional charge is due.

Rs. Ps.

Received a registered* addressed to

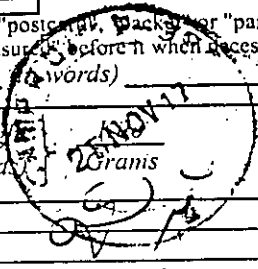
Date-Stamp

Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) (in words)

If insured.

Insurance fee Rs. (in words) Weight Grams Name and address of sender



Attested
M. P. S. 1

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Ann^o 6^o (14)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT BUNER.

OFFICE ORDER.

✓
WHEREAS Mr. Quraish Khan PST GPS Nagrai was proceeded against under the Khyber Pukhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. AND WHEREAS the show cause notice vide this office Endst;No.6425-28 dated 14/11/2017 was issued to him but reply of the show cause notice was found unsatisfactory as well as he did not desired to be heard in person.

3. AND WHEREAS the competent authority (D.E.O Male Buner) is satisfied that he is not interested in Govt; duty and the charges against the accused teacher have been proved.

4. NOW, THEREOF, in exercise of the powers conferred under sub rule 4b (ii) of Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules 2011, the Competent Authority is pleased to impose Major penalty "Compulsory retirement from service with effect from 01/07/2016 (A/N) and recovery of amount Rs.412885/- upon Mr. Quraish Khan PST GPS Nagrai .

Note:-

Necessary entry to this effect should be made in his service Book accordingly.

(BAKHT ZADA)
DISTRICT EDUCATION OFFICER (M)
BUNER

Dated 20/1/2018.

Endst; No. 421-26

Copy for information to :-

1. Director (E&SE) Khyber Pakhtun Khwa Peshawar.
2. Deputy Commissioner Buner.
3. District Monitoring Officer Buner.
4. Sub Divisional Education Officer (M) ~~Khanjira~~ *Mandera*
5. District Accounts Officer Buner.
6. Official Concerned.

attested
(Signature)

(Signature)
DISTRICT EDUCATION OFFICER (M)
BUNER

F.M.14 / 32nd
~~ATI~~
کمران جاوید

To,

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Ann H

141
6/2/18

The Worthy Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: **DEPARTMENTAL APPEAL AGAINST THE ORDER ENDST NO.421-26 DATED 20.01.2018 RECEIVED ON 28.01.2018, WHEREBY MAJOR PENALTY OF COMPULSORY RETIREMENT FROM SERVICE W.E.F. 01.07.2016 AND RECOVERY OF AMOUNT RS.412885/- HAS BEEN IMPOSED.**

Respected Sir,

The appellant submits as under:-

1. That appellant was rendering services as PST Teacher in your esteemed department since 03.10.1988 with full zeal and devotion and, as such, he has completed more than 28 years of service with unblemished record.
2. That in the month of May, 2016, the appellant suffered from Psychiatric illness due to which he filed an application to the Head Teacher on 01.07.2016 for pre-mature retirement. **(Application is attached)**
3. That Head Teacher of the School instead of forwarding the stated application to the competent authority, he himself resumed the power of competent authority and relieved the appellant from the duty. **(Copy attached)**



- (21)
4. That on receiving the application of retirement by the concerned authority, the stated application was returned for the simple reason that there is a conflict in the date of birth of the appellant's service book and CNIC and the office will entertain the same after its correction by the Court of law, but this was not conveyed to the appellant.
 5. That due to the stated facts the application for retirement was not confirmed/ sanctioned by the competent authority, the appellant a filed another application for resuming duty. **(Copy attached)**
 6. That appellant time and again requested to the competent authority for allowing him to resume his duty, but in vain.
 7. That fact finding committee was constituted by the competent authority before issuing of show cause notice, but the same was not conveyed to the appellant despite the fact he has submitted application under Right to Information Act, 2013 through R/A. **(Copy attached)**
 8. That on the same day the appellant was served with a show cause notice dated 14.11.2017. **(Copy attached)**
 9. That the appellant filed reply to the show cause notice within the stipulated period.
 10. That no regular inquiry has been conducted by the competent authority, hence the impugned order of compulsory retirement is illegal and of no legal effect.
 11. That no final show cause notice has been issued to the appellant, which shows the malafide intention of the competent authority.



- (22)
12. That the procedure contained in Efficiency and Deficiency Rules, 2011 has not been followed rather the process conducted is contrary to the law on the subject, hence is liable to be set at naught.
 13. That no right of hearing is given to the appellant before passing the impugned order, hence it liable to be set-aside on this score alone.
 14. That the fact finding inquiry has not been supplied to the appellant, which is mandatory under the law.
 15. That appellant has not been treated in accordance with law on the subject, hence the impugned order is against the spirit of law.
 16. That appellant has not misconducted himself by way of absence or by way of embezzlement, hence the punishment is not commensurate with the facts of the case.
 17. That appellant is desirous to be heard in person, hence he request for the same.

It is, therefore, requested that on acceptance of this appeal, the impugned order dated 28.01.2018 may kindly be set-aside and the appellant may be reinstated in to service with all back benefits.

Request

Appellant

قرايش خان
Quraish Khan

PST GPS Nagrai

District Buner

Cell: 0345-2827179

0342-9475265

6/2/2018

Dated: 06.02.2018

وکالت نامہ

بعدالت سرسوس ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ
 قریبہ خان نامہ ڈوسر لکڑی ایجوکیشنل افسر اور
 منجانب رسیدہ دعویٰ سرسوس اپیل

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام کے لیے جسے ورو و سنگھ کسمپ کورٹ
 مشتاق احمد خان ایڈووکیٹ پشاور کو بدین شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو
 عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر
 پیشی پر من مظر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی
 طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا
 پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز
 تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظر کو کوئی نقصان پہنچے تو اس کی ذمہ دار یا اس کے واسطے کسی
 معاوضہ کے ادا کرنے یا محتانہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر ساختہ صاحب
 موصوف مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری و نظر
 ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کاروبار
 وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد ثالثی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ
 دینے کا بھی اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری، یکطرفہ درخواست حکم امتناع یا قرتی یا گرفتاری قبل
 از اجراء ڈگری بھی موصوف کو بشرط ادا کی علیحدہ محتانہ پیروی کا اختیار ہوگا، اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا
 ، یا مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے
 یا اپنے ہمراہ مقرر کریں، اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے، جیسے کہ صاحب موصوف کو
 حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور
 ایسی صورت میں میرا کوئی مطالبہ بھی صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا تاکہ سند رہے۔
 مورخہ ----- مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Attested & Accepted



Mushtaq Ahmed Khan Advocate

العبد

العبد

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 755/2018

Quraish Khan -----Appellant.

VERSUS

District Education Officer (Male) Buner & Others -----Respondents.

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DEPONENT

CNIC No.15101-0882586-3

①

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 755/2018

Qurish Khan Ex-PST Govt; Primary School Nagrai, District Buner _____ Appellant

Versus

1. District Education Officer Male District Buner
2. Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar
3. Govt: Of KPK through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
4. SDEO Mandanr District Buner.
5. Head Teacher GPS Nagrai District Buner.

Respondents

Written reply / Para wise comments for on half of Respondents No. 1, 2, 3, 4 & 5.

Respectfully Sheweth

Preliminary Objections.

1. The Appellant has no cause of action/locus standi.
2. The instant appeal is badly time barred.
3. The Appellant has concealed the material facts from this honourable Tribunal, hence liable to be dismissed.
4. The Appellant has not come to this honourable Tribunal with clean hands.
5. The Appellant has filed the instant appeal just to pressurise the respondent.
6. The appellant has filed the instant appeal on malafide motives.
7. The instant appeal is against the prevailing law and rules.
8. That the appellant has been estopped by his conduct to file the appeal.

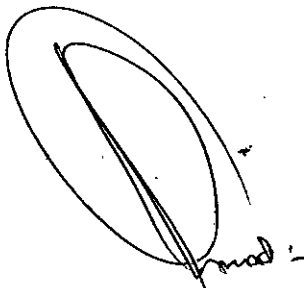
Facts

1. Correct, to the extent that the appellant was appointed as Primary School Teacher on 03/10/1988 and then he was performing his duties in different schools.
2. Pertains to the service record of the appellant.
3. Correct, to the extent that on May 2016 the appellant submitted an application for retirement to the concerned head teacher instead of competent authority which is illegal against the rules and head teacher is not competent authority for resignation.
4. Contradiction has made in his statement that the head teacher informed the appellant that he had been relieved from duty pursuant to his application for retirement, neither the competent authority approved his application nor the concerned head teacher sent the application of the appellant for further proceeding. How the appellant absented from duty without the approval of the competent authority.
5. In correct, if the appellant has neither submitted any application to the competent authority for retirement, nor he is retired from service, how he can have claimed for retirement benefits.
6. In correct, neither the appellant joined his duty nor the applicant submitted any application to the concerned authority for solving the matter.
7. Pertains to record.
8. Pertains to record.
9. Pertains to record.
10. Correct, to the extent that the wilful absence from duty of the appellant the competent authority issued show cause notice on 14/11/2017 as Annexure-A.
11. Incorrect, before the major penalty "Compulsory retirement from service the competent authority conduct enquiry against the appellant, in the light of the said enquiry the competent authority has removed the appellant from compulsory retirement on 01/07/2018 issued on 20/01/2018 enquiry report is attached as Annexure B & C

Grounds.

1. Incorrect, that the impugned order dated 20/01/2018 is legal justified in accordance with law rule and policy.
2. Incorrect, before the compulsory retirement the competent authority issued show cause notice and conducted an enquiry against the appellant. In the light of enquiry report the appellant has been compulsory retirement from service.
3. Incorrect, as per Para No. 11 of the Facts.
4. Incorrect, before the retirement the competent authority has fulfilled criteria for compulsory retirement.
5. Incorrect, as per Para No. 11 of the Facts.
6. Being a Govt servant the department cannot take the law in their hands in correctly and properly proceeded.
7. Incorrect, as per para No. 11 of the facts.
8. Legal, however the respondents seeks leave of the honourable Court to submit additional grounds and record at the time of arguments.

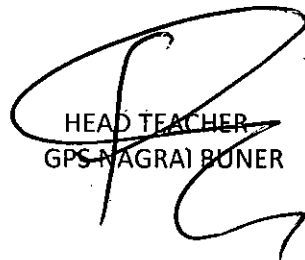
In view of the above noted submissions it is requested that this honourable Tribunal may very graciously be pleased to dismiss the instant appeal and favour of the respondent department.



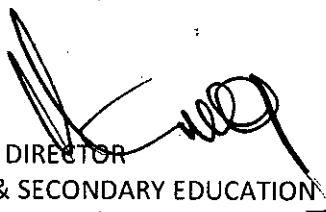
SDEO MANDANR
DISTRICT BUNER



DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER



HEAD TEACHER
GPS NAGRAI BUNER



DIRECTOR
ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR



SECRETARY
ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 755/2018

Quraish Khan -----Appellant.

VERSUS

District Education Officer (Male) Buner & Others -----Respondents.

AFFIDAVIT

I Ubidur Rahman ADEO (litigation) office of the District Education officer (Male) Buner do hereby solemnly affirms & state on oath that the whole contents of the reply are true & correct to the best of my knowledge & belief & nothing has been concealed from this August Court.



DEEDONENT
15101-0882586-3

NOTICE (1) - The Post Office is not responsible for loss of damage in the case of internal articles, unless they are otherwise stated.

SHOW CAUSE NOTICE

Amrore LAT

(4)

(5)

I Mr. Bakht Zada District Education Officer (M), as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you, as follows.

I am satisfied that you have committed the following acts / omissions specified in rule 3 of the said rules;

- You, Mr. Quraish Khan PST GPS Nagrai was found guilty of absenteeism, inefficiency and misconduct.
- Time and again you were reported absent from your duty by the SDEO(M) Mandanr.
- You were found guilty of absenting himself from duty
- You are not interested in Govt; duty.

Consequently a comprehensive /detail enquiry was conducted against you which proved the charges of continuous absence and embezzlement of Rs.412885/- against you.

- As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major/minor penalties, under rule 4 of the said rules.
- You are, thereof, required to show cause as to why the one of the major 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 not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

(BAKHT ZADA)

DISTRICT EDUCATION OFFICER (M)

BUNER.

Endstt: No 6425-28 Dated 14/11/17

Copy of the above is forwarded for information to the

- Deputy Commissioner Buner
- District Monitoring Officer Buner
- Sub Divisional Education Officer (M) Mandanr Buner
- Official concerned.

Relieved in original

14/11/17
[Signature]

DISTRICT EDUCATION OFFICER (M)

BUNER.

[Signature]

سوال نمبر 1: آپ کا پورا نام، رکنیت اور CNIC نمبر کیا ہے؟

جواب: 1۔ تحصیل فیٹوم ولد شہروز خان

1-7-248-15101

سوال نمبر 2: آپ کی پہلی تقرری تک کیوں ہے؟

جواب: 1۔ $\frac{10}{1988}$

سوال نمبر 3: سکول میں (جی ایس ٹری) آپ تکب خارج کیا ہے؟

جواب: 1۔ $\frac{8}{2006}$

سوال نمبر 4: سٹی قریس خان آPS نے جی ایس ٹری میں تکب خارج کیا ہے؟

جواب: 1۔ $\frac{8}{2006}$

سوال نمبر 5: کیا قریس خان آPS نے کم ایسٹ کو ایسٹ میں تکب خارج کیا ہے؟

جواب: 1۔ یاں

سوال نمبر 6: اگر جواب یاں میں ہے تو درخواست پر کارروائی کرنے کے بعد آپ نے قریس خان کو مقام بالا کو لیکھانے کے لیے حوالہ کیا تھا؟

جواب: 1۔ یاں

سوال نمبر 7: کیا آپ کو علم ہے کہ 1-7-248 کے بعد قریس خان آPS نے ایس ٹری کو

وہل کیا ہے؟

جواب: 1۔ یاں

Head Master
GPS Nagrai
BPS -15 Distt: Buner

3/8/2017

سوال نمبر 1: آپ کا پورا نام، ولدیت اور CNIC ملندہ کیا ہے؟

جواب: قریش خان ولد سرنگھار خان
 15101-343790-5

سوال نمبر 2: آپ کی پہلی تدریسی کب ہوئی ہے؟

جواب: 3/19/88

سوال نمبر 3: سکول انڈارجی پی ایچ ایس ٹنڈی میں آپ نے کب چارج لیا ہے؟

جواب: 16/06/08

سوال نمبر 4: پی ایچ ایس ٹنڈی سے پہلے آپ کس سکول میں ڈپٹی اوپریٹنگ تھے؟ اور کب سے کب تک؟

جواب: گورنمنٹ ایچ ایچ ایس ٹنڈی سے 2003ء تا 2008ء تک

سوال نمبر 5: آپ نے دوران سروس میں کس قسم کا Long Leave لیا ہے؟

جواب: لیا گیا ہے

سوال نمبر 6: کیا آپ نے 16-7-18 سے ریٹائرمنٹ کیلئے درخواست دی تھی؟

جواب: ہاں

سوال نمبر 7: اگر جواب ہاں میں ہے تو بیدارگی سے دستخط کنندہ SDFO آفس ڈگری میں اپنی درخواست

کس کو حوالہ دی ہے؟

جواب: تاج پور ڈسٹرکٹ کارڈ اور سروس بک میں فرق کی وجہ سے درخواست

سوال نمبر 8: ریٹائرمنٹ درخواست کی ہے آپ نے کب تک اپنی تنخواہ بند سے واپس لی ہے؟

جواب: 15-فانہ تنخواہ وصول کی ہے

سوال نمبر 9: کیا یکم اگست 2016ء سے آپ تک کبھی -PST- ٹنڈی میں -ڈپٹی- تھے؟

جواب: ہاں سکول میں -ڈپٹی- ڈپٹی ایچ ایچ ایس ٹنڈی میں

دستخط
 قریش خان PST پرائمری سکول ٹنڈی

Amesme(B)

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INQUIRY AGAINST MR. QURAIKH KHAN PST, GPS NAGRAI (BUNER)

Reference District Education Officer (M) letter No. Dated / /2017 on the subject titled above, I, Iftikhar Ul Ghani Dy. DEO (M) Buner, along with Mr. Bakht Sher Hussain SDEO (M) Mandan as member of the said committee visited GPS Nagrai in connection with to inquire the case against Mr. Quraish Khan PST, GPS Nagrai. The present inquiry is being conducted in response to the report of the SDEO Mandan wherein it was identified during his surprise visit that the mention delinquent official has been absent since long and regularly taking his salary. The delinquent teacher has kept both the school and office in darkness under the false disguise of his retirement while regularly receiving his salary unlawfully, hence the present inquiry.

Methodologies Used for Inquiry

1. Field Visit
2. Obtaining information through questionnaires
3. Interview
4. Cross-questioning
5. Obtaining information from teachers and students.

Venue

GPS Nagrai District Buner.

Background/Problem review

The instant inquiry is being conducted in response to the report put forward by the SDEO (M) Mandan which exposed that Mr. Quraish Khan PST, GPS Nagrai was absent from 01/07/2016 till date under the false disguise of retirement and is regularly taking his salary. On inquiry from the H.T, it was reported that he has forwarded application for retirement from the former and his name has been omitted from the teachers' attendance register accordingly. On the other hand he

ADEO (BUNER)
10/7/17

(23) 2. (8)

has not yet submitted his case for retirement to the office and kept the school in darkness; otherwise the H.T could have marked him as absent. Furthermore, pension/retirement case has also not been submitted to SDEO(M) Mandan for onward submission to DEO Office for sanction and further necessary processing. The case has neither been detected by the IMU nor the school administration pointed due to the fraudulence, fake and phony appearance of being retired prematurely on the part of the delinquent teacher.

Findings of Facts

In order to establish the guilt or innocence of Mr. Quraish Khan PST, the inquiry officers made use of all the available information. Para wise perusal of record and allegation collaborated with sieving and sifting of evidences connotes the following evidential comments.

1. Attendance register was perused, revealing that his name exists in the month of May 2016, while onwards i.e from June 1st 2016, it has been omitted due to his false submission of retirement application. (photocopies of the attendance register are attached as annexure 1). As per averment of the head teacher Mr.Quraish khan said that his retirement case is in progress at the DEO Office and his name may not be recorded in the attendance register as he has got retired. Therefore, his name was effaced from the register and could not be recorded further.
2. Bank statement of his salary account was got and checked. (Attached as annexure 2.) It exhibits that his salary has continuously been transferred to his account, and has withdrawn the same accordingly. He has been absent from school since 1/7/2016 till the inquiry date, while received his salary to 30/5/2017 (10 months) amounting Rs.412885 unlawfully for his absent period.

3. Questionnaires were served to Head Teacher and the delinquent official. According to the H.T assertion, Quraish Khan PST has apparently written and forwarded an application for retirement from July 1st, 2016, however it is not known whether he has submitted the same to SDEO (M) Mandan/Daggar for further necessary action or not. He also denied knowing whether he is regularly receiving his salary or not. A separate questionnaire was also served to Quraish Khan, who in his responses on the questionnaire admitted that he had submitted an application for retirement, however took it back due to discrepancy in D.O.B in service book and CNIC. However, his claim of discrepancy in his date of birth could not be verified as he refused to provide his service book in order to verify the validity of his claim. It seems then a lame excuse because neither he informed the office nor did process the case for rectification of his D.O.B. and was regularly taking his salary from the bank. Even if he is honest and true to his averment, he should have resumed his duty immediately after the discrepancy was found in his D.O.B or should have informed the office of his absence due to retirement and the salary should not have been taken regularly. But infact, he purposely detained his application with him in order to keep both the school and office in darkness and ignorance and thereby enjoy salary without performing duty. If it was not caught by the then SDEO, he would have been regularly receiving free salary from the Government unlawfully.

Recommendations

Analyzing and thorough perusal of all the available record and evidences, we rummaged out that he is guilty of inefficiency, misconduct and absenting himself from duty under Rules 3 (a) (b) and (d) of the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules 2011,

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which resulted in pecuniary loss to the state treasury. Keeping in view the above discussion, the following recommendations are suggested for further necessary action:

1. Major penalty of Compulsory Retirement under Rules 4 (b) (ii) is recommended to be imposed and he may be compulsorily retired from service due to proved grave charges of inefficiency, misconduct and absenting himself from duty under Rules 3 (a) (b) and (d) of the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules 2011, w.e.f the date of his absence and abscondence from duty i.e 1/7/2016.
2. The salary amount i.e **Rs. 412885/** of 10 months absent period may be recovered from him and be refunded in the Govt. treasury through proper challan within fifteen days of the issuance of his retirement order, failing which, the same amount may be recovered through police and anticorruption Deptt.
3. His pension case may not be processed unless he refunds salary of 10 months calculated above.

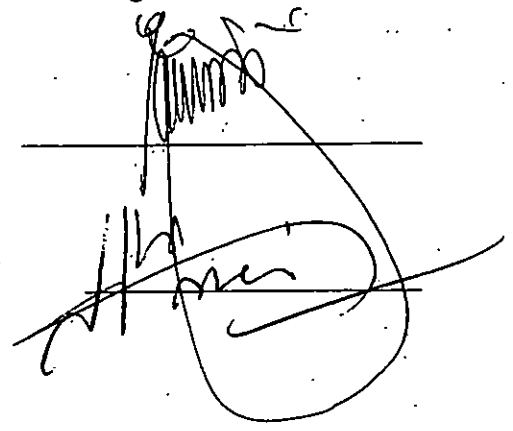
1. Ifikhar Ul Ghani (Chairman)

Dy. DEO (M) Buner

2. Bakht Sher Hussain

SDEO (M) Gagra

Signature



Amir (C)

(11)

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT BUNER.

OFFICE ORDER.

WHEREAS Mr. Quraish Khan PST GPS Nagrai was proceeded against under the Khyber Pukhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. AND WHEREAS the show cause notice vide this office Endst;No.6425-28 dated 14/11/2017 was issued to him but reply of the show cause notice was found unsatisfactory as well as he did not desired to be heard in person.

3. AND WHEREAS the competent authority (D.E.O Male Buner) is satisfied that he is not interested in Govt; duty and the charges against the accused teacher have been proved.

4. NOW, THEREOF, in exercise of the powers conferred under sub rule 4b (ii) of Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules 2011, the Competent Authority is pleased to impose Major penalty "Compulsory retirement from service with effect from 01/07/2016 (A/N) and recovery of amount Rs.412885/- upon Mr. Quraish Khan PST GPS Nagrai

Note:-

Necessary entry to this effect should be made in his service Book accordingly.

(BAKHT ZADA)
DISTRICT EDUCATION OFFICER (M)
BUNER

Endst; No. 421-26

Dated 20/11 /2018.

Copy for information to :-

1. Director (E&SE) Khyber Pakhtun Khwa Peshawar.
2. Deputy Commissioner Buner.
3. District Monitoring Officer Buner.
4. Sub Divisional Education Officer (M) Khadukhail .
5. District Accounts Officer Buner.
6. Official Concerned.

DISTRICT EDUCATION OFFICER (M)
BUNER

Before the khyber-pukhtoonkhwa service tribunal Peshawar.

Rejoinder in Appeal No 755 of 2018

Qurish khan.....petitioner

Vs

District Education officer Buner and others.....respondents


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S NO	Description of documents	Annextures	Pages
1	rejoinder		
2	Affadavit		

Dated: 6/02/2019

Appellant

Through

Mushtaq Ahmad khan advocate 

Office district court daggar

Cell no.03469014199-

Before the khyber pukhtoonkhwa service tribunal Peshawar.

Rejoinder in Appeal No 755 of 2018

Qurish khan.....petitioner

Vs

District Education officer Buner and others.....respondents

Rejoinder to the comments of respondents.

Following replication/rejoinder is submitted on behalf of Appellant:.

Preliminary objections

1. Preliminary objection no 1 is incorrect. The departmental has committed an illegality by compulsorily retiring the appellant and ordering recovery of salary from him, hence the only remedy was to prefer an appeal before this worthy tribunal which he has rightly availed.
2. Incorrect hence denied.
3. No material has been concealed from the honorable court. the objection is without any factual and legal base.
4. The objection is without any factual and legal base.
5. The objection is without any factual and legal base.
6. As per Para no 1.
7. The objection has no legal foundation.
8. Preliminary objection no 8 is without any legal base hence denied.

Facts

1. Para no 1 of the appeal has been accepted by the respondents hence needs no reply.
2. Para no 2 of the appeal have been accepted by the respondents hence needs no reply.
3. Para no 3 have been admitted by the official respondents in substance however the explanation given is misconceived and incorrect.
4. Para no 4 of the appeal is correct and reply thereto is misconceived. The appellant have filled application to his head according to law.
5. Para no 5 of the appeal is correct and reply thereto is misconceived. the remaining portion has been answered in the preceding Para.
6. Para no 6 of the appeal is correct and reply thereto is without any legal and factual base.
7. Para no 7 of the appeal has been accepted by the respondents hence needs no reply.
8. Para no 8 of the appeal has been accepted by the respondents hence needs no reply.
9. Admitted by respondent hence need no reply.

10. Para no 10 of the appeal has been accepted by the respondents hence needs no reply.
11. Para no 11 of the appeal is correct and reply thereto is without any legal and factual base. Neither any regular inquiry have been conducted after issuance of show cause notice dated 14/11/2014 nor any inquiry officer had been appointed for the purpose. Moreover no charge sheet, statement of allegation and final show cause notice has been sent to the appellant and he has been condemn unheard by violating the cardinal principle of Audi alterm partum.

Grouns

- A. Ground no 1 of the appeal is correct and reply thereto is wrong in law.
- B. Ground no 2 of the appeal is correct and reply thereto is without any legal and factual base. Detail has been given in Para no 11 of the instant rejoinder.
- C. Ground no 3 of the appeal is correct and reply thereto is without any legal and factual base. Detail has been given in Para no 11 of the instant rejoinder.
- D. Ground no 1 of the appeal is correct and reply thereto is wrong in law. the competent authority has violated the law ,rules and principles of natural justice..
- E. As per the preceding Para.
- F. Ground no 6 to 8 of the appeal are correct and reply thereto is without any legal and factual base. Detail has been given in Para no 11 of the instant rejoinder.

It is therefore kindly prayed that the appeal of the appellant may kindly be accepted for the end of administration of justice according to law.

Appellant

Through



Mushtaq Ahmad Khan advocate

Office district court daggar

Cell no 03469014199

Before the khyber pukhtoonkhwa service tribunal Peshawar.

Rejoinder in Appeal No 755 of 2018

Qurish khan.....petitioner

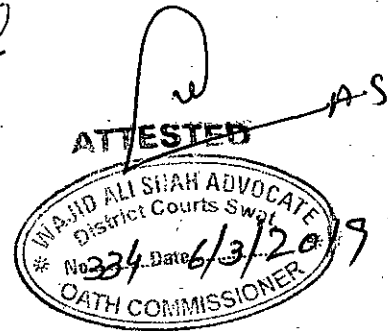
Vs

District Education officer Buner and others.....respondents

Affidavit

I Mushtaq Ahmad khan Alizai advocate as per instruction of my client ,do hereby solemnly affirm and declare on oath that the contents of the rejoinder are correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

Deponent.



KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1759 /ST

Dated 14 / 10 / 2019

To


The District Education Officer Male,
Government of Khyber Pakhtunkhwa,
Buner.

Subject: -

JUDGMENT IN APPEAL NO. 755/2018, MR.OURISH KHAN.

I am directed to forward herewith a certified copy of Judgement dated 02.09.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

Before the service tribunal khyber pukhtoonkhwa Peshawar .

C.M in

Service appeal No 755 of 2018

Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant

Vs


District Education officer(M) Buner and others.....respondents

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S.NO	Description of documents	annexures	pages
1	Application for placing on file additional documents		1
2	Affidavit		2
3	Extract of service Book	A	3
4	Copy of CNIC of the appellant	B	4
5	Letters of SDEO Mandanr district Buner	C	5 to 8

along with bank statement

Appellant
Through


Mushtaq ahmad khan alizai
Advocate
Office district court buner
Cell no 03469014199.

Before the service tribunal khyber pukhtoonkhwa Peshawar .

C.M in

Service appeal No 755 of 2018

**Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant**

Vs

1. District Education officer(M) Buner .
2. Director E & SE khyber pukhtoonkhwa at Peshawar.
3. Govt of K.P.K through secretary E & SE khyberpukhtoonkhwa at Peshawar.
4. SDEO Mandanr district buner.
5. Head teacher GPS Nagrai district Buner.



Application for placing on file additional documents on behalf of the Appellant.

Respectfully sheweth:.

1. That the titled appeal is pending adjudication before this hon,able Tribunal and is fixed for today i.e 3 . 4 .2019.
2. That the appellant have inadvertently not annexed some necessary public documents which are indispensable for proper adjudication of the case(Documents are attached as anx A,B and C).
3. That non submission of the above mentioned documents were not willful and being relevant public documents its submission is necessary for the end of justice.

It is therefore kindly requested that by accepting the present application the accompanied documents be placed on file and may be considered part and parcel of the titled case for the proper administration of justice.

Dated 3 /04/2019


Appellant
Through 
Mushtaq ahmad khan alizai
Advocate
Office district court buner

Before the service tribunal khyber pukhtoonkhwa Peshawar .

C.M in

Service appeal No 755 of 2018

Qurish khan Ex PST Government primary school Nagrai,district
Buner.....appellant

Vs

District Education officer(M) Buner and others.....respondents

Affidavit

I Mushtaq Ahmad khan alizai advocate as per instruction of appellant , do hereby solemnly affirm and declare on oath that the contents of the instant application is true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable tribunal.



Deponent
Mushtaq Ahmad khan

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

1. Name *QURAIISH KHAN.*

2. Race *Afghan*

3. Residence *Vice Sp. O. Nagrai, Teh: Dargan Dist: Swat*


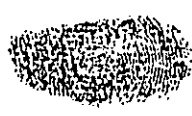
4. Father's name and residence *Sardar G. Khan*

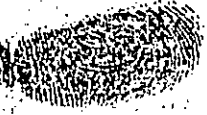
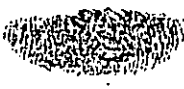
5. Date of birth by Christian era as nearly as can be ascertained *12-12-1934*

6. Exact height by measurement *5-6*

7. Personal marks for identification *Scars on right hand*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger  Ring Finger 

Middle Finger  Fore Finger 

Thumb 

9. Signature of Government servant *[Signature]*

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

Sub-Divisional Edu. Officer (M)
Dargan, Swat Dist.

attested and accepted

(5)

Annex "C"

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

NO. 1170 DATED 4 / 8 2017

To

The Assistant Director,
NRC Kankowai, Buner

Subject :-

D/O BIRTH VERIFICATION IN R/O QURISH KHAN.PST

Memo:-

Reference your Office Letter No.01/25/2017/V/NRC- Kankowai 292 dated 25th July 2017 regarding the subject cited above

The Correct D/o Birth in R/o the above named teacher according to Original Service Book/ SSC Certificate as 12/12/1964 therefore correction please may be made in CINC.

DA. 12

F.No. 1/25/17

dt 4/8/17

04/08/2017

SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

20/30

Assistant Director
NRC Kankowai
Dist. Buner

attested
&
accepted -
CMS

CB

OFFICE OF THE SUB DIVISIONAL OFFICER(M)
DAGGAR DISTRICT BUNER
NO 1171 DATED 7 / 18 / 2017

To

The Assistant Director
NRC Kankowai ,Buner.

Subject;- NOC IN R/O MR. QURAIKH KHAN PST CORRECTION IN D/BIRTH

Memo;

Enclose please find herewith no objection certificate regarding Mr. Quraish Khan PST, GPS Nagrai, further more clarified that the undersigned has no objection on correction of Date of Birth in R/O official Above cited.
Per original service book and SSC certificate record.

SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

Sub 13
F.No. 112A/17
dt 7/18/2017

20130
Assistant Director
NRC Kan Kawai
Dist Buner

attested

OFFICE OF THE SUB DIVISIONAL OFFICER(M)
DAGGAR DISTRICT BUNER
NO 1172 DATED 9 / 18 2017

To

The Asstt; Director
NRC Kankowai, Buner.

Subject; VERIFICATION OF NOC

Memo;

Reference is made due to your office No 01.25.2017/v/NRC Kankowai dated 07.08.2017 regarding NOC verification of Mr.Quraish khan S/O Sarfaraz khan NOC issued vide this office Endst No; 1171 dated 7-8-17 is correct and verified.

B.No. 14

Ex.No. 1/25/17

dt. 9/8/2017

SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

2017

20130
Assistant Director
NRC Kan Kawai
Dist Buner

Attested
and accepted

8

National Bank of Pakistan Account Statement

Account Title(s) QURESH KHAN S/O SARFARAZ KHAN

Address: VILL NAGRAI DISTT DAGGAR

STOPED BY DDO

Postal Code:

Branch Code/Name: 1704 DAGGAR

Region Name: Mardan

Statement of Account

Statement Printing Date: 03-Aug-2017

B/F Balance: 10,294.00

From: 02-Jun-2016 To: 31-Jul-2017

Town:
District:
City: BUNNER
Province/State: KH, PAKHTOON
Country: PAKISTAN
Product Name: PKR Current Account
Currency: PKR
CIF No: 1374698
Account No: 4016191772
IBAN: PK19NBPA1704004016191772
Your CNIC has expired. Kindly provide a copy of your new CNIC to the bank at the earliest

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
					0.00	39,528.00	49,822.00
1	27-Jun-2016	SALARY		27			
					42,000.00	0.00	7,822.00
2	28-Jun-2016	CASH WITHDRAWAL	635479				
					0.00	39,679.00	47,501.00
3	29-Jul-2016	SALARY		29			
					42,000.00	0.00	5,501.00
4	01-Aug-2016	CASH WITHDRAWAL	635480				
					0.00	42,449.00	47,950.00
5	31-Aug-2016	SALARY		31			
					47,000.00	0.00	950.00
6	03-Sep-2016	CASH WITHDRAWAL	635481				
					0.00	42,102.00	43,052.00
7	30-Sep-2016	SALARY		30			
					0.00	41,630.00	84,682.00
8	31-Oct-2016	SALARY		31			
					0.00	41,630.00	126,312.00
9	30-Nov-2016	SALARY		30			
					0.00	42,459.00	168,771.00
10	31-Dec-2016	SALARY		31			
					0.00	39,689.00	208,460.00
11	31-Jan-2017	SALARY		31			
					150,000.00	0.00	58,460.00
12	04-Feb-2017	CASH WITHDRAWAL	635482				
					0.00	39,269.00	97,729.00
13	28-Feb-2017	SALARY		28			
					95,000.00	0.00	2,729.00
14	07-Mar-2017	CASH WITHDRAWAL	635484				
					0.00	42,039.00	44,768.00
15	31-Mar-2017	SALARY		31			
					42,000.00	0.00	2,768.00
16	04-Apr-2017	CASH WITHDRAWAL	635485				
					0.00	41,939.00	44,707.00
17	27-Apr-2017	SALARY		27			
					42,000.00	0.00	2,707.00
18	03-May-2017	CASH WITHDRAWAL	635486				
					460,000.00	452,413.00	
Total 11 Credit transactions of amount:					452,413.00		
Total 7 Debit transactions of amount:					460,000.00		

Handwritten signature

This is a computer generated statement and does not require any signature

Before the service tribunal khyber pukhtoonkhwa Peshawar .

C.M in

Service appeal No 755 of 2018

Qurish Khan Ex PST Government primary school Nagrai, district
Buner.....appellant

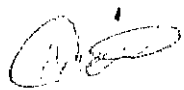
Vs

District Education officer(M) Buner and others.....respondents

Index

S.NO	Description of documents	annexures	pages
1	Application for placing on file additional documents		1
2	Affidavit		2
3	Extract of service Book	A	3
4	Copy of CNIC of the appellant	B	4
5	Letters of SDEO Mandanr district Buner	C	5 to 8

along with basic statements

Appellant
Through 
Mushtaq ahmad khan alizai
Advocate
Office district court buner
Cell no 03469014199.

Before the service tribunal khyber pukhtoonkhwa Peshawar .

C.M in

Service appeal No 755 of 2018

Qurish khan Ex PST Government primary school Nagrai, district
Buner.....appellant

Vs

1. District Education officer(M) Buner .
2. Director E & SE khyber pukhtoonkhwa at Peshawar.
3. Govt of K.P.K through secretary E & SE khyberpukhtoonkhwa at Peshawar.
4. SDEO Mandanr district buner.
5. Head teacher GPS Nagrai district Buner.

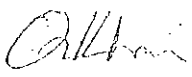
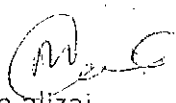
Application for placing on file additional documents on behalf of the Appellant.

Respectfully sheweth:.

1. That the titled appeal is pending adjudication before this hon,able Tribunal and is fixed for today i.e 3 . 4 .2019.
2. That the appellant have inadvertently not annexed some necessary public documents which are indispensable for proper adjudication of the case(Documents are attached as anx A,B and C).
3. That non submission of the above mentioned documents were not willful and being relevant public documents its submission is necessary for the end of justice.

It is therefore kindly requested that by accepting the present application the accompanied documents be placed on file and may be considered part and parcel of the titled case for the proper administration of justice.

Dated 3 /04/2019


Appellant
Through 
Mushtaq ahmad khan alizai
Advocate
Office district court buner

Before the service tribunal khyber pukhtoonkhwa Peshawar .

C.M in

Service appeal No 755 of 2018


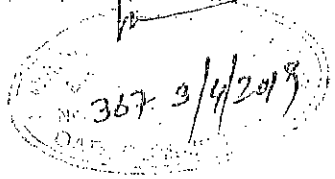
Qurish khan Ex PST Government primary school Nagrai, district
Buner.....appellant

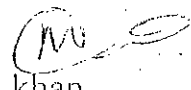
Vs

District Education officer(M) Buner and others.....respondents

Affidavit

I Mushtaq Ahmad khan alizai advocate as per instruction of appellant , do hereby solemnly affirm and declare on oath that the contents of the instant application is true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable tribunal.


A.S.


Deponent 
Mushtaq Ahmad Khan

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

1. Name QURAIISH KHAN

2. Race Afghan

3. Residence Vice Consul General, New Islamabad



4. Father's name and residence Sardar Abdul Karim Khan, New Islamabad


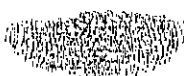
5. Date of birth by Christian era as nearly as can be ascertained 12-14-1946


6. Exact height by measurement 5 6

7. Personal marks for identification Scars on Right Hand

8. Left hand thumb and Finger impression of (non-gazetted) officer [Signature]

Little Finger  Ring Finger 

Middle Finger  Fore Finger 

Thumb 

9. Signature of Government servant [Signature]

10. Signature and designation of the Head of the Office, or other Attesting Officer [Signature]

Sub-Divisional Edu. Officer (M)
Daggar, Swat Dist.

attested and accepted



PAKISTAN National

ISLAMIC REPUBLIC OF PAKISTAN

Name

Quarish Khan



Father Name

Sarfraz Khan

قریش خان

Gender

M

Country of Stay

Pakistan

سرفراز خان

Identity Number

15101-0343790-5

Date of Birth

12.12.1963

Date of Issue

08.09.2014

Date of Expiry

08.09.2021

Holder's Signature

15101-0813790-5



سرکار کی نمائندگی کے لئے

Ministry of Finance
Secretary General of Pakistan

503261017667
115-63-083140

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں

(5)

Annex 'C'

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

NO. 1170 DATED 4 / 8 / 2017

To
The Assistant Director,
NRC Kankowai, Buner

Subject :- D/O BIRTH VERIFICATION IN R/O QURISH KHAN PST

Memo:-

Reference your Office Letter No.01/25/2017/V/NRC- Kankowai 292 dated 25th July 2017 regarding the subject cited above

The Correct D/o Birth in R/o the above named teacher according to Original Service Book/ SSC Certificate as 12/12/1964 therefore correction please may be made in CINC.

DA. 12
F.A. 1/25/17
Jr 4/8/17

04/08/2017

SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

2017
Assistant Director
NRC Kankowai

attested
& accepted
ALS

(B)

OFFICE OF THE SUB DIVISIONAL OFFICER(M)
DAGGAR DISTRICT BUNER
NO 1171 DATED 7/18 2017

To

The Assistant Director
NRC Kankowai ,Buner.

Subject;- NOC IN R/O MR. QURAIKH KHAN PST CORRECTION IN D/BIRTH

Memo;

Enclose please find herewith no objection certificate regarding Mr. Quraish Khan PST, GPS Nagrai ,further more clarified that the undersigned has no objection on correction of Date of Birth in R/O official Above cited.
Per original service book and SSC certificate record.

SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

Sub 13

F.No. 1124/17

dt - 7/8/2017

20130
Assistant Director
NRC Kankowai
Dist Buner

attested

OFFICE OF THE SUB DIVISIONAL OFFICER(M)
DAGGAR DISTRICT BUNER
NO 1177 DATED 9 / 8 2017

To

The Asstt; Director
NRC Kankowai, Buner.

Subject; VERIFICATION OF NOC
Memo;

Reference is made due to your office No 01.25.2017/v/NRC Kankowai dated 07.08.2017 regarding NOC verification of Mr. Quraish Khan S/O Sarfaraz Khan NOC issued vide this office Endst No; 1171 dated 7.8.17 is correct and verified.

*S/No. 14
F/No. 1/25/17
dt. 9/8/2017*

SUB DIVISIONAL EDUCATION OFFICER (M)
DAGGAR DISTRICT BUNER

20130
Assistant Director
NRC Kan Kawai
Dist Buner

*Attested
and accepted
(MS)*

National Bank of Pakistan

Account Statement

Account Title(=) QURESH KHAN S/O SARFARAZ KHAN

Address: VILL NAGRAI DISTT DAGGAR

STOPED BY DDO

Postal Code:

Branch Code/Name: 1704 DAGGAR

Region Name: Mardan

Statement of Account

Statement Printing Date: 03-Aug-2017

Town:

District:

City: BUNNER

Province/State: KH.PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 1374698

Account No: 4016191772

IBAN: PK19NBPA1704004016191772

Your CNIC has expired. Kindly provide a copy of your new CNIC to the bank at the earliest

B/F Balance: 10,294.00

From: 02-Jun-2016 To: 31-Jul-2017

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
				27	0.00	39,528.00	49,822.00
1	27-Jun-2016	SALARY					7,822.00
2	28-Jun-2016	CASH WITHDRAWAL	635479		42,000.00	0.00	47,501.00
3	29-Jul-2016	SALARY		29	0.00	39,679.00	5,501.00
4	01-Aug-2016	CASH WITHDRAWAL	635480		42,000.00	0.00	47,950.00
5	31-Aug-2016	SALARY		31	0.00	42,449.00	950.00
6	03-Sep-2016	CASH WITHDRAWAL	635481		47,000.00	0.00	43,052.00
7	30-Sep-2016	SALARY		30	0.00	42,102.00	84,682.00
8	31-Oct-2016	SALARY		31	0.00	41,630.00	126,312.00
9	30-Nov-2016	SALARY		30	0.00	41,630.00	168,771.00
10	31-Dec-2016	SALARY		31	0.00	42,459.00	208,460.00
11	31-Jan-2017	SALARY		31	0.00	39,689.00	58,460.00
12	04-Feb-2017	CASH WITHDRAWAL	635482		150,000.00	0.00	97,729.00
13	28-Feb-2017	SALARY		28	0.00	39,269.00	2,729.00
14	07-Mar-2017	CASH WITHDRAWAL	635484		95,000.00	0.00	44,768.00
15	31-Mar-2017	SALARY		31	0.00	42,039.00	2,768.00
16	04-Apr-2017	CASH WITHDRAWAL	635485		42,000.00	0.00	44,707.00
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Total 11 Credit transactions of amount:					452,413.00		
Total 7 Debit transactions of amount:					460,000.00		
					460,000.00	452,413.00	

This is a computer generated statement and does not require any signature