

11.11.2021

Ms. Naila Jan, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, placed on file of Service Appeal bearing No. 550/2018 titled "Mst. Zia Gul Versus Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and three others", the instant appeal is allowed by setting-aside the impugned order and the matter is remitted to the respondents to conduct regular inquiry into the matter within a period of 90 days of receipt of copy of this judgment. Needless to mention that the appellant shall be associated with the inquiry by providing him fair opportunity of defending himself. Keeping in view the peculiar nature of controversy in question, no order regarding release of salary of the appellant could be passed at this stage, which of course would be subject to outcome of the inquiry. Findings in this judgment shall have no bearing upon the criminal case registered vide FIR No. 02/2017 Police Station Anti-Corruption Establishment Charsadda. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

11.11.2021



(Atiq-Ur-Rehman Wazir)
Member (E)

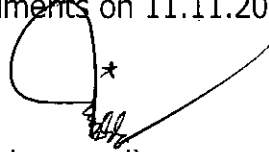


(Salah-Ud-Din)
Member (J)

08.10.2021

Nemo for the appellant. Mr. Kabirullah Khattak,
Add. AG for the respondents present.

Notice be issued to appellant and her counsel. To
come up for arguments on 11.11.2021 before the D.B.


(Mian Muhammad)
Member(Executive)


Chairman

10.03.2021

Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Learned A.A.G stated that similar nature cases are pending for hearing on ~~17.07~~.2021 before this Tribunal, and requested that the instant case may be adjourned to ~~17.07~~.2021. Request is accepted. To come up for arguments on ~~17.07~~.2021 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

17.06.2021

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 08.10.2021 before D.B.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIARY)

02.07.2020

Mr. Juma Gul, Special Attorney for the appellant on behalf for the appellant and Mr. Muhammad Jan learned DDA for the respondents present.

Former requests for adjournment due to indisposition of learned counsel.

Adjourned to 01.10.2020 for arguments before D.B.



Member

Chairman 

01.10.2020

Junior to counsel for the appellant Addl. AG for the respondents present.

Request for adjournment is made due to non-availability of learned senior counsel for the appellant. The matter is adjourned to 22.12.2020 for hearing before the D.B.

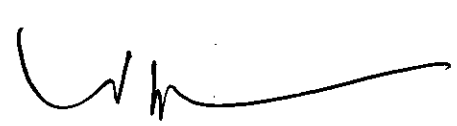

(Mian Muhammad)
Member (Executive)

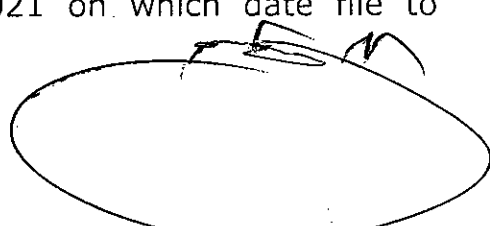
Chairman 

22.12.2020

Mr. Juma Gul, husband of the appellant who is also attorney for appellant is present. Zara Tajwar, Deputy District Attorney for the respondents is also present.

According to the husband of appellant the learned counsel representing appellant is indisposed of today. Requested for adjournment. Adjourned to 10.03.2021 on which date file to come up for arguments before D.B.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

11.12.2019

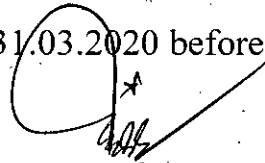
Lawyers are on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for further proceedings/arguments on 14.02.2020 before D.B.


Member


Member

14.02.2020

Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Wahid Ullah ADO and Mudassir Litigation Officer present. Learned counsel for the appellant seeks adjournment. Adjourned To come up for arguments on 31.03.2020 before D.B.


Member


Member

31.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 02.07.2020 before D.B.


Reader

01.07.2019

Appellant with counsel present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondent present. Written reply not submitted. None present on behalf the respondent department therefore notice be issued to the respondent department to attend the court and submitted written reply/comments. Adjourned. To come up for written reply/comments on 27.08.2019 before S.B.


Member

27.08.2019

Brother of appellant and Addl. AG alongwith Fawad Senior Clerk, Mudassir Shah, ADEO and Hayatur Rahman, Superintendent for the respondents present.

Representatives of respondents state that written reply prepared but not yet vetted and request for further time. Last opportunity is granted to the respondents for submission of requisite reply/comments on 25.09.2019 before S.B.


Chairman

25.09.2019

Counsel for the appellant and Addl. AG alongwith Mudassir Shah, ADO for the respondents present.

Written reply on behalf of respondents furnished which ~~are~~^{is} placed on record. The appeal is assigned to D.B for arguments on 11.12.2019. The appellant may submit rejoinder, within a fortnight, if so advised.


Chairman

1380/18

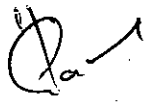
09.04.2019 Counsel for the appellant and Addl. AG on behalf of the respondents present.

Learned AAG requests for time to procure reply of the respondents. The respondents shall positively submit the requisite reply/comments on next date of hearing.

Adjourned to 14.05.2019 before S.B.

Chairman 

14.05.2019 Learned counsel for the appellant present. Written reply not submitted. No one present on behalf respondents. Shakeel Ahmad Superintendent (for respondent No.1) and Hayat Assistant Director (for respondent No.2) absent. The above mentioned representatives as well as respondents ~~No.3 & 4~~ be put to notice with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 01.07.2019 before S.B.


Member

17.1.2019

Miss Humma Khan, Advocate submitted an application for adjournment on account of indisposition of learned senior counsel for the appellant.

Adjourned to 21.02.2019 before S.B.


Chairman

21.02.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Ex-PST) has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 22.11.2017 whereby the services of the appellant alongwith other (04) teachers were dispensed..

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 09.04.2019 before S.B.

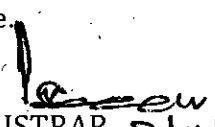



Appellant Deposited
Security & Process Fee


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1380/2018

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 08/11/2018 | <p>The appeal of Mst. Nighat Seema presented today by Naila Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 8/11/18</p> |
| 2- | 17-11-2018 | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>4-12-18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |
| | 04.12.2018 | <p>Counsel for the appellant requests for adjournment in order to further prepare the brief on the point of status of appellant as civil servant and also the competency of instant appeal. Adjourned to 17.01.2019 before S.B.</p> <p style="text-align: right;"> Chairman</p> |

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A. 1380 /2018

Nighat Seema

VERSUS

Director of Elementary and Secondary Education Khyber
Pakhtunkhwa Peshawar and Others

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Dated: 08/11/2018

Through

Nighat Seema
Appellant
Naila Jan
Naila Jan

Advocate, High Court
Peshawar.

D

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A. 1380 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1617

Dated 08/11/2018

Nighat Seema D/O Raz Muhammad R/o Noor
Bahar Colony No.1 District Charsadda.

Appellant

VERSUS

- ✓1. The secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa.
- ✓2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- ✓3. District Education officer Female Charsadda.
- ✓4. District Education Officer Female Batagram.

Respondents

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST THE ORIGINAL ORDER
DATED 22/11/2017, WHEREBY SERVICES OF
THE APPELLANT WAS DISPENSED, WHICH
IS AGAINST THE LAW, RULES,
PRINCIPLES OF NATURAL JUSTICE, VOID
ABINITIO IS NOT APPLICABLE ON THE
RIGHTS OF THE APPELLANT**

Filed to-day

Registrar

8/11/18

alwajh

PRAYERS:-

ON ACCEPTANCE OF THIS APPEAL THE
IMPUGNED ORDER DATED 22/11/2017 MAY

KINDLY BE SET ASIDE BEING ILLEGAL VOID
ABINITIO AND THE APPELLANT MAY
KINDLY BE REINSTATED INTO SERVICE
WITH ALL BACK BENEFITS.

Respectfully Sheweth,

The appellant submits as under:-

Facts:-

1. That the appellant after acquiring the requisite qualification was appointed on dated 01/09/2009 by the competent authority as AT Teacher (BPS-09) and was posted at Government girls Middle School Gidri Khairabad District Batagram and after appointment the appellant performed her duties with great zeal zeast. **(Copy of the appointment order is annexed as annexure "A")**
2. That the appellant was transferred by the Respondents from district Batagram to District Charsadda vide order dated 16/11/2012 and was posted at Government Girls Middle School Amir Abad Daki District Charsadda and then vide order dated 04/12/2012 the appellant was posted as AT Teacher at Government Girls High School Dadu Kalay. **(Copy of the LPC in**



District Batagram is annexed as annexure "B" and the transfer order dated 16/11/2012 is annexed as annexure "C" and order dated 04/12/2012 is annexed as annexure "D").

3. That after assuming the charge and performing of his duty the services of the appellant was duly verified from the District Education Officer Female Batagram vide letter No.7519/ verification dated 09/01/2013 and after the verification of the service as well as Educational documents of the appellant the district Education Officers Female Charsadda vide order No.270 dated 16/01/2013 order for release pay of the appellant. (Copies of the same are annexed as annexure "E,F & G" and pay slip is annexed as annexure "H")

4. That all of a sudden services of the appellant was dispense with vide impugned order dated 22/11/2017 though the word dispenses of services has no where mentioned in any service law or rules. (Copy of the impugned order is annexed as annexure "I")

submit

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5. That feeling aggrieved from the order dated 22/11/2017 the appellant filed a departmental appeal before Respondent No.1 however the same has not yet been decided. **(Copy of the Departmental Appeal is annexed as annexure "J")**
6. That feeling aggrieved from the impugned order the appellant filing this appeal on the following grounds inter alia:-

GRUNDS:-

- A. That the impugned order is against the law, rules and, principle of natural justice, hence void abinitio.
- B. That the punishment of dispensation of service is neither been mentioned in the Efficiency and Disciplinary Rules 2011. Nor did in the Khyber Pakhtunkhwa Civil Servant Act 1973, or any other Law and Rules so on this score alone the impugned orders are liable to be set aside.

[Handwritten signature]

5

C. That the appellant since her appointment with effect from 2009 till the impugned order served the department and regularly received salaries. So valuable rights of the appellant has been created and the appellant under the principle of locus pententia is entitled for reinstatement.

D. That the appellant has been subjected to discrimination hence the Respondents violated articles 25 of the constitution of Islamic republic of Pakistan 1973.

E. That the impugned order is not speaking orders.

F. That the right of fair Trails has not been provided to the appellant hence violated Article 10-A of the constitution of Islamic Republic of Pakistan 1973.

G. That no charge sheet, statement of allegation final show cause notice is served upon the appellant. Nor did any regular inquiry was

aladdin

6

conducted hence the whole proceeding were
illegal.

H. That appellant has not been provided
opportunity of personal hearing hence
condemned unheard.

I. That appellant seeks permission of this Hon'ble
Tribunal to adduce other grounds during course
of arguments.

It is, therefore, most humbly prayed
that the appeal may kindly be accepted as
prayed for in the heading of the appeal.

Dated: 08/11/2018

Aigmal Zaman
Appellant

Through

Naila San
Naila San

Advocate, High Court
Peshawar.

NOTE:-

No such like appeal for the same appellant,
upon the same subject matter has earlier been
filed by me, prior to the instant one, before this
Hon'ble Tribunal.

Naila San
Advocate

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**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A _____/2018

Nighat Seema

VERSUS

Director of Elementary and Secondary Education Khyber
Pakhtunkhwa Peshawar and Others

AFFIDAVIT

I, Nighat Seema D/O Raz Muhammad R/o Noor Bahar Colony No.1 District Charsadda, do hereby solemnly affirm and declare that all the contents of the **accompanied appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

Nighat Seema
DEPONENT

Identified By;

Naila Jan
Naila Jan
Advocate High Court
Peshawar.

ATTESTED
IRFAN ULLAH ADVOCATE
NOTARY PUBLIC
IRFAN ULLAH

8

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A _____/2018

Nighat Seema

VERSUS

Director of Elementary and Secondary Education Khyber
Pakhtunkhwa Peshawar and Others

ADDRESSES OF PARTIES

APPELLANT.

Nighat Seema D/O Raz Muhammad R/o Noor
Bahar Colony No.1 District Charsadda

RESPONDENTS

1. The secretary Elementary and Secondary Education Government of Khyber Pakhtunkhwa.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education officer Female Charsadda.
4. District Education Officer Female Batagram.

Dated: 08/11/2018

Nighat Seema
Appellant

Through

Naila San
Naila San

Advocate, High Court
Peshawar.

(11)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E& SE) BATTAGRAM.

APPOINTMENT ORDER.

Consequent upon the approval of competent authority that Mst Nighat Seema D/O Raz Muhammad is hereby appointed as A.T in Govt. Girls Middle School, Gidri Khair Abad Battagram in BPS -09 against vacant post plus usual allowances as admissible under the rule in the interest of public service with effect from the date of her taking over charge.

TERMS & CONDITIONS.

1. She will be governed by such rules & regulation as may be prescribed by the Govt. from time to time for category of the Govt. Servant to which he belong.
2. In case of resignation prior notice of one month should be given by the official concerned other wise one month pay /allowances will be forfeited in lieu thereof Her original Certificate/degrees should be checked and verified from the concerned BISE/University concerned etc before handing taking over charge by the DDO concerned through Agency Education Officer concerned.
3. She declaration of assets should be obtained and kept in safe custody by the DDO concerned.
4. She take over charge of her post with in one month after the issue of this appointment order
5. Charge reports should be sent to all concerned.
6. NO TA/DA etc is allowed

EXECUTIVE DISTRICT OFFICER
ELE & SECY EDU BATTAGRAM

Endst No 394-70/AB/Estb (F).

Dated 01-09/2009.

Copy forwarded for information & necessary action to the:-

- 1:- P.S to DCO Battagram..
- 2:- District Accounts Officer concerned
- 3:- Distt. Officer Female Concerned..
- 4:- Candidate concerned
- 5:- Personal file

DISTRICT OFFICER (FEMALE)
ELE & SECY EDU BATTAGRAM

DISTRICT OFFICER (FEMALE)
ELE & SECY EDU BATTAGRAM

Handwritten signature

LAST PAY CERTIFICATE

"B"

(6)

A Pay Certificate of M. J. Seema
of the GEMS, Giddi Chauri, Abad, Battagram
proceeding to Transfer to GEMS, Amra, Abad, Distt. Charsadda

12

He has been paid upto 30-11-2012

as the following rates:

Particulars:

Substantive Pay: 12-11-11 to 30-11-12

Officiating Pay: 11-20-12

Exchange Compensation Allowance

P.No. 00607147

Pay = 8500

HRA = 1566

C/A = 2000

MA = 1000

UAA = 1000

Adh 5% = 1900

Ad. 2011 = 871

Ad. 2012 = 1700

G. Total = 18814

PC No. 112
Pay St. P. No. 112
1-12-2011
Deductions =

C.P.F. = 15.20 B.F. = 180

A.S. = 13.91 = 115

Entitled to Charge of the Office of

on the noon of

Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

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

From to at Rs. a month

From to at Rs. a month

From to at Rs. a month

Head Mistress
G.C. M. Chauri
Distt. Charsadda

He is entitled to draw the following:—

He is also entitled to joining time for days.

The details to the income tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

Endst No 7018-19 dt: 30/11/12

① BDO (E.S.F.) Charsadda

② DAO (E.S.F.) Charsadda

Verified

Dated at 19

DISTRICT OFFICER (FEMALE)
ELEMENTARY & SECONDARY EDUCATION
BATGRAM

Signature.....
Designation.....
DISTRICT OFFICER (FEMALE)
ELEMENTARY & SECONDARY EDUCATION
BATGRAM

Handwritten signature

" 11
C
13

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR.

OFFICE ORDER.

Consequent upon ban relaxation by the competent authority, Mst. Nighat Seema (AT) GGMS Gidri Khairabad District Battagram is hereby transferred/adjusted against the vacant post of (AT) at GGMS Amir Abad Dakki District Charsadda on her own pay & BPS in the interest of public service with effect from the date of her taking over charge.

- Note: -
1. Charge report should be submitted to all concerned.
 2. No TA/DA etc are allowed.
 3. The EDO concerned is directed to check her original service documents before making payment of salary.
 4. Her Seniority will be determined as per rules/policy.

DIRECTOR
ELEMENTARY & SECY; EDUCATION
KHYBER PAKHTUNKHWA

Enclst: No. 17/66-71 /F.No.167/ Vol-5 Transfer(F) K.P Dated Pesh: the 16/11/2012

Copy of the above is to the:-

1. Executive District Officer (E&SE) Battagram & Charsadda.
2. District Accounts Officers Battagram & Charsadda.
3. Teacher concerned.
4. Headmistress concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. M/File.

Manzoor
DISTRICT OFFICER (E&SE)
ELEMENTARY & SECONDARY EDUCATION
BATTAGRAM

for Deputy Directress (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Manzoor

Relaxing

Narayan

12

12
14

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) CHARSADDA

OFFICE ORDER

Mstt: Nighat Seema AT GGMS-Gidri Khair Abad District Battagram under transferred to GGMS Amir Abad Dhakki is hereby posted at GGHS Dado Killi against the vacant post AT on her own pay & grade in the interest of public service with immediate effect.

Note:-

1. No TA/DA is allowed
2. Charge report should be submitted to all concerned.

(ATTA ULLAH KHAN)
EXECUTIVE DISTRICT OFFICER
E&SE CHARSADDA

Endstt No. 2486-90 /Dated Charsadda the 4/12/12

Copy for Information & Necessary action to the:

1. District Account Office Charsadda
2. Head Mistress Concerned
3. Accountant Local Office
4. ADO B&A/Suptt: Local Office
5. Official Concerned
6. Office File

~~EXECUTIVE~~ DISTRICT OFFICER
E&SE CHARSADDA

Sajid

F
16

OFFICE OF THE DISTRICT EDUCATION OFFICER

(FEMALE) CHARSADDA
No 2009 / Date 18/3 2013

To

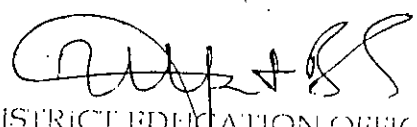
The District Accounts Officer,
Charsadda

SUBJECT: RELEASE OF PAY

Memo:

The documents in r/o Mst: Nighat Seema D/O Raz Muhammad GGLIS (AT) Dado Killi has been verified from the concerned Board/Universities and found correct.

In the light of the above mentioned verification, the undersigned is pleased to release the pay of the said teacher.

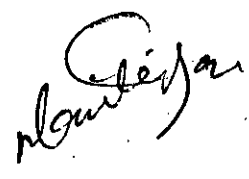

DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA

16/3

Endst: No

Copy for information to the:
1. Head Mistress concerned

DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA



"E"

17

OFFICE OF THE DISTRICT EDUCATION OFFICER
FEMALE CHARSAKDA
NO. 270 DATED 14/1/2013

To

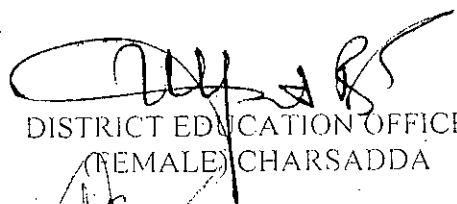
The Head Mistress
GGHS Dado Kili Charsakda

SUBJECT:- VERIFICATION OF SERVICE DOCUMENTS

Memo

The following documents along with original S/Book /LPC/ Transfer order in r/o Mstt: Nighat Seema (AT) of your school has been unified from DEO (F) Education Battagram through special messenger.

Her pay may be therefore released.


DISTRICT EDUCATION OFFICER
(FEMALE) CHARSAKDA



Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (September-2017)

" H "



Personal Information of Ms NIGHAT SEEMA d/w/s of RAZ MUHAMMAD

Personnel Number: 00607147 CNIC: 1710154189974 NTN:
Date of Birth: 09.03.1987 Entry into Govt. Service: 01.09.2009 Length of Service: 08 Years 01 Months 001 Days

Employment Category: Vocational Temporary

Designation: ARABIC TEACHER 80001160-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6206-
Payroll Section: 001 GPF Section: 001 Cash Center: 01
GPF A/C No: 607147 Interest Applied: Yes **GPF Balance:** 129,428.00
Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 5

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|---------------------------|----------|
| 0001 | Basic Pay | 22,770.00 | 1000 | House Rent Allowance | 1,566.00 |
| 1210 | Convey Allowance 2005 | 2,856.00 | 1300 | Medical Allowance | 1,500.00 |
| 2148 | 15% Adhoc Relief All-2013 | 530.00 | 2199 | Adhoc Relief Allow @10% | 365.00 |
| 2211 | Adhoc Relief All 2016 10% | 1,911.00 | 2224 | Adhoc Relief All 2017 10% | 2,277.00 |

Deductions - General

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|-------------------|---------|
| 3015 | GPF Subscription - Rs2890 | -2,890.00 | 3501 | Benevolent Fund | -600.00 |
| 3609 | Income Tax | -2.00 | 3990 | Emp.Edu. Fund KPK | -125.00 |
| 4004 | R. Benefits & Death Comp: | -1,052.00 | | | 0.00 |

Deductions - Loans and Advances

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

Deductions - Income Tax

Payable: 20.30 Recovered till September-2017: 2.00 Exempted: 7.41 Recoverable: 10.89

Gross Pay (Rs.): 33,775.00 Deductions: (Rs.): -4,669.00 Net Pay: (Rs.): 29,106.00

Payee Name: NIGHAT SEEMA
Account Number: 02177900409603
Bank Details: HABIB BANK LIMITED, 220217 TEHSIL BAZAR, CHARSADDA. TEHSIL BAZAR, CHARSADDA., CHARSADDA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: BTTAGRAM Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address: City: Email: marwajanichd@gmail.com

System generated document in accordance with APPM 4.6.12.9 (SERVICES/29.09.2017/20:15:23/v1.1)
** All amounts are in Pak Rupees*
** Errors & omissions excepted*



103

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
CHARSADDA

No. 10643 dated 22/11/2017

81

Office order

(1)

(19)

In the light of inquiries report & court judgments, the appointments of the following teachers are illegal, void ab-initio and against the prescribed rules, therefore the services of the following teachers are hereby dispensed hence they are no more remained teachers.

| S.NO | NAME OF TEACHERS | DESIGNATION | SCHOOL NAMES | REMARKS |
|------|------------------|-------------|----------------------------------|---|
| 01 | Zia Gul | DM | GGMS Hameed mian dheri Charsadda | Through court Judgment w/p no 2028/2017, enquiry report. |
| 02 | Nighat seema | AT | GGHS Dado killi charsadda | Through verification vide letter No 312 dated 18-01-2017 |
| 03 | Hasrat PET | PET | GGHS turlandi charsadda | DO |
| 04 | Sania wali | SST | GGHS Daulat pura | Vide letter No, 7603 dated 13-10-2017 send by the DEO (F) to director, response vide letter No, 2630 dated 13-10-2017 |
| 05 | Shama begum | PST | GGPS pegham koroona charsadda | Through judgment w/p no 4738-p/2016 & enquiry report |

DISTRICT EDUCATION OFFICER
FEMALE CHARSADDA

Endst N _____ dated _____ 2017

Copy for information

- (1) Registrar Judicial Peshawar high court.
- (2) Director E&SE kpk peshawar.
- (3) Official concerned.

DISTRICT EDUCATION OFFICER
FEMALE CHARSADDA

Received on
2/12/2017.

FAIRDA

Received
dated 2-12-17
at 01:12 PM.

Chatterjee

بجھور جناب سیکرٹری ایجوکیشن صاحب خیبر پختونخوا، پشاور

محکمہ اہل ادرخواست

گزارش ہے کہ میری تعیناتی بطور (A.T (BPS-9) گورنمنٹ گرلز ہائی اسکول، گدڑی، خیر آباد، ضلع بگرام میں بروئے آرڈر نمبر (F) 3964-70/AB/Estb مورخہ 01.09.2009 کو ہوئی۔ بعد میں میرا تبادلہ بروئے چھٹی نمبر (F) K.P 1766-71/E.No.167/Vol-5/Transfer مورخہ 16/11/2012 گورنمنٹ گرلز ہائی اسکول، عامر آباد، ڈھکی، ضلع چارسدہ، کیا گیا جس کے بعد مجھے گورنمنٹ گرلز ہائی اسکول، دادوکلے، ضلع چارسدہ بروئے چھٹی نمبر 2486-90، مورخہ 04.12.2012 کو تعینات کیا گیا۔ ابھی حال ہی میں مجھے ڈسٹرکٹ ایجوکیشن آفیسر (فیمیل)، چارسدہ نے بروئے چھٹی نمبر 10643، مورخہ 22.11.2017 کو نوکری سے برخاست کیا گیا جس میں چھٹی نمبر 312، مورخہ 18.01.2017 کا حوالہ دیا گیا ہے۔ مجھے سنے کا موقع دیا گیا ہے اور نہ ہی کوئی مناسب انکوائری ہوئی ہے۔ میری تعیناتی عین قانون کے مطابق ہوئی ہے اور بعد از ضروری قانونی لوازمات مجھے بطور A.T تعینات کیا گیا تھا۔ میری کوالیفیکیشن مذکورہ پوسٹ کے عین مطابق ہے، میرے تعلیمی اسناد کی باقاعدہ تصدیق کی گئی ہے اور دیگر دستاویزات کی تصدیق بھی محکمہ تعلیم نے کی ہے جو درست و صحیح ثابت ہوئے ہیں، مذکورہ تمام کاغذات درخواست ہذا کے ساتھ لف کئے جا رہے ہیں۔

لہذا میری آپ حضور سے استدعا ہے کہ حکم برخواستگی / چھٹی نمبر 10643،

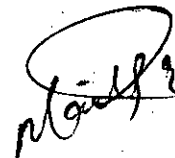
مورخہ 22.11.2017 کو منسوخ فرما کر مجھے اپنے پوسٹ پر بحال کیا جائے۔

عرضی

نگہت سیما ولد راز محمد

ساکن نور بہار کالونی نمبر 1، چارسدہ۔ (سائلہ)

موبائل نمبر: 0321-9884189



21

وکالت نامہ

بعدالت کپ سرویس ٹریبونل پشاور

نام محمد سعید
تاریخ 08/11/2018 منجانب Appellant

Appel No. 1380
2018 باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی وجوہد ہی بمقام Peshawar کے لئے

نانکہ جان ایڈوکیٹ ہائی کورٹ انڈیا حیدرآباد

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشوری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پشوری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پشوری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچنے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرواختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے 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 اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد دہائی 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 امتناعی یا قرقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا ہوگی علیحدہ مختیار نامہ 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، اقبال کے واسطے کسی دوسرے وکیل یا ہیر منٹر 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 پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختیار نامہ لکھ دیا تاکہ سند رہے مورخ 08/11/2018۔ مضمون مختیار نامہ بن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

ATTESTED & ACCEPTED

n/antafan
نانکہ جان ایڈوکیٹ پشاور ہائی کورٹ پشاور

Abdul Samad
محمد سعید

Final
aul

Before the KP Service Tribunal Peshawar.

Nighat Seema

VS

Education

Application for Adjournment

Respectfully Sheweth: Applicant Submits as Undee.

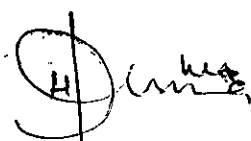
- 1) That the above mention appeal is pending before this Hon'able Tribunal and today the date is fixed for preliminary hearing
- 2) That due to illness Counsel of the applicant is unable to attend the Court / Tribunal

So, it is therefor requested that the case / Appeal may kindly be adjourned due to the above reason

Applicant through Counsel

Date 17:01:2019

Naila Jan
HUMA KHAN Advocates



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 1380/2019

Mst Nighat Seema

Vs

Govt. of Khyber Pakhtunkhwa

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 1380/2019

Mst Nighat Seema

Vs

Govt. of Khyber Pakhtunkhwa

Written Reply on behalf of Respondents

Respectfully Sheweth:

Preliminary Objections:

- A. The Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless hence not tenable in the eyes of law, and not maintainable, it shows no cause to be taken for adjudication, therefore the same Appeal is liable to be rejected/ dismissed.
- C. That the Appeal is bad for misjoinder and nonjoinder of necessary parties.
- D. That no legal right of the appellant has been violated, therefore the appellant has no right to file the instant appeal.
- E. That the appeal is wholly incompetent, misconceived & not maintainable in its present form..
- F. The Appellant is completely estopped /precluded by her conduct to file this Appeal.
- G. Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from mis-statements and concealments of facts and as such the Appellant is not entitled to equitable relief.
- H. That the the Hon' able Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I. That the appeal is not maintainable under section(4) of service tribunal Act. The appellant not come within the Ambit of civil Servant & the appeal of the appellant badly time barred

PARA WISE REPLY ON FACTS:

1. Para 1 Incorrect & concocted the Appointment order of the appellant along with others teachers found fake & bogus and also registered FIR against the appellant along with others fake teachers under section 218-409-419-420-468-471-474-477-A PPC/5(2) PC Act at AC Charsadda(**Copy of FIR annexure A**) hence the above mentioned FIR is subjudice before the Hon,ble high court Peshawar for adjudication and the District Education officer (F) Battagram also declared the appointment order of the Appellant fake & bogus vide letter No3046/2019 dated 16/072019. (**Copy of letter Annexure B**)
2. Incorrect, false and concocted hence denied, the Appellant just mislead the Hon,ble tribunal by self-made story moreover the brother of the appellant recorded categorically statement before the Civil court Charsadda that Mr (Ameen clerk GHS NO 1, Peshawar) took Rs 5,8000 from my father for getting employment for my sister in Education department, thereafter I came to know that the above said Ameen clerk has committed fraud with us and handed over to us a bogus & fake appointment & transfer order, (**Copy of order sheet of civil court annexure C**)
3. Incorrect, all record of the appellant is fake & bogus the brother of the appellant admitted before the civil court Charsadda that the said Ameen clerk handed over to us a bogus & fake appointment & transfer order hence facts admitted need not be prove, the other hand AT is District cadre post and District Battagram hailing from Hazara division.
4. Para 4 the Appellant is not a civil servant she has no right to file the instant appeal before the Hon,ble service tribunal.
5. Incorrect & concocted the appellant not filed departmental appeal before respondent No 1 there is no dispatch No on the Appeal .
6. That the respondent department acted as per law.

ON GROUNDS:

- A. Incorrect the respondents acted accordance with law hence as per the statement of the brother of the appellant the appointment order is fake & bogus and void abinitio.
- B. Incorrect and baseless, detail reply has been given in the above paras .
- C. Incorrect and against the actual facts, A detail reply has been given in above para 1&2.
- D. Incorrect the appellant has no valid ground to rely on. Similarly placed cases subjudice before the Peshawar high court and lodge FIR against the all fake teachers who was transfer from District Battagram. And same questions of

facts pending before this Hon,ble tribunal as Appeal No 1390/18, Mst Shama Appeal no 1504 Nazma Ali, Appeal No 550/18 Zia Gul hence there is no discrimination amongst the fake teachers.

- E. Reply of this ground as per paras 1&2, moreover the appointment order of the appellant found fake and bogus and also the Anti-corruption department registered FIR against the appellant & others fake teachers.
- F. That the appointment order of the Appellant declared fake & bogus moreover facts admitted needs not to be prove hence the Appointment order of the Appellant void ab initio.
- G. The Appellant just invoke constitutional jurisdiction of the Hon,,ble tribunal moreover facts admitted needs not to be prove.
- H. Reply of this grounds as per paras above
- I. That the answering respondent also seek permission of the Hon,ble tribunal to adduce further points at the time of arguments.

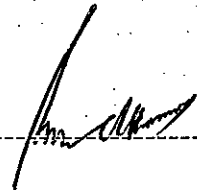
It is, therefore, most humbly prayed that the appeal of the appellant may be dismissed with cost.

Respondents:

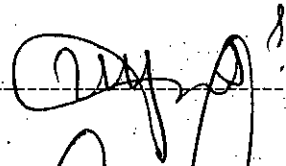
1 Secretary E&SE Khyber pukhtoon kha



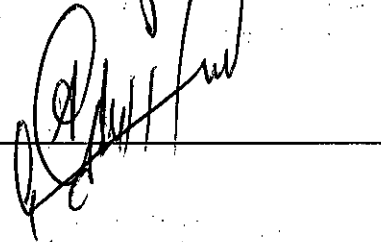
2 Director E&SE Khyber pukhtoon khwa-----



3 District Education officer female Charsadda-----



3 District Education officer (F) Battagram-----



4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No 1380/2019

Mst Nighat Seema

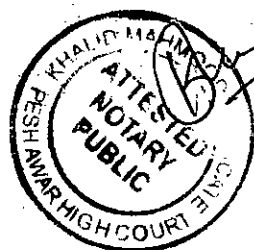
Vs

Govt. of Khyber Pakhtunkhwa

Written Reply on behalf of Respondents

AFFIDAVIT

I Mr Mudassir shah ADEO Litigation of the DEO (F) Charsadda do hereby as per information conveyed to me by DEO (F) Office solemnly affirm and declared that the contents of para wise reply are true and correct to the best of my knowledge and nothing has been intentionally concealed from this Hon'ble Tribunal.



Deponent

Mudassir shah ADEO Litigation
O/O DEO (FEMALE)
Charsadda CNIC: 17101 6347249-1

فلمند شدہ بیانات حرمول شدہ و پرنٹیشن رپورٹ حاتمہ د لکھی اتواروں سے غام ملزمان
 اضیاء میں ٹیپر DM گریڈ 66MS9 جلدیاں ڈھیری جارہے (2) نگیٹ سیمائی جیل ٹیپر AT
 یڈ 66MS15 دادو کے (3) حدت فی جیل ٹیپر PET گریڈ 66MS9 ترملا ندی (4) ٹائینہ ولی فی جیل
 ٹیپر SST گریڈ 16MS15 دو تہ پورن (5) سٹو بیگم فی جیل ٹیپر PST گریڈ 7MS15 بیگم کوروا
 ارہ (6) سو فیہ DEO فی جیل گریڈ 19 صلہ جارہے (7) الفت بیگم سابقہ DEO فی جیل گریڈ 15 اصلو
 زندہ (8) قد آیاز DAO گریڈ 18 صلہ بیگم ام حال ڈسبس (9) حامد یونس سہا اگما وینٹ گریڈ 15
 وینٹ ام حال ڈسبس (10) قد ریاض سینرا ڈسٹری گریڈ 16 صلہ بیگم ام حال دفتر DA صلہ عالیہ (11)
 ران بیگم گریڈ 16 صلہ عالیہ دفتر DA (12) طاری قصور ATO گریڈ 16 صلہ بیگم ام (13)
 رنگزیب سینرا ڈسٹری گریڈ 15 دفتر DA بیگم ام حال ڈسبس (14) قد امین سینر کلرک گریڈ 14
 لا ایجوکیشن سیکریٹریٹ (15) فتناق احمد سابق سینر سٹڈنٹ گریڈ 17 دفتر DEO فی جیل جارہے
 علی رضن سابق سینر سٹڈنٹ دفتر DEO فی جیل صلہ بیگم ام گریڈ 17 (16) حفیہ حسین جوینر کلرک گریڈ 11
 زہرہ DEO فی جیل جارہے (18) قد امین سینر کلرک گریڈ 11 دفتر SDEO فی جیل ٹیپر (19) سہیل PST
 گریڈ 18MS15 پیپر ہجویٹ (20) سورتاج جوینر کلرک گریڈ 11 دفتر SDEO فی جیل جارہے حال
 ای بڑا جارہے وقتا فوقتا الجین ملی طلبت کرتے فراڈ دھوکہ دہی سے اپنے احکامات کے غلط و ناجائز
 مال کے صلہ جارہے بیس سہارا خرم کو نتوانوں حد میں کل میلو 5766918 روپے نقصان پہنچایا
 جبکہ بیانات فلمند شدہ (سردہ 164MS15) سے پائی گئی کہ ملزمان سہیل نے 8 تا 8 اگست منظم کر کے
 بینک کے سہیل میں اسکا 2 کارڈوں کے جوڑوں کو نوکری کا حوالہ دینے کے بعد ان سے نوکریوں کے پورے
 میں لکھ کر تمام ملزمان ان کا 20 اگست ملی بینک فراڈ دھوکہ دہی احکامات کے غلط اور ناجائز
 سہیل اور بیگم دینے اور اپنے کے ہر ملک یا کرجن کے خلاف خرم جن انگریزی میں 15313 جوڑے 9
 یہ از جناب DAC، خیر پور جوڑے اور متعدد درجہ رجسٹر لیا جاتا ہے تمام نوکریوں کا رول بھی لیا گیا ہے
 اور پورا انگریزوں تفسیر دیکھ کر کوئی شخص یا اشخاص یا دیگر سرکاری ملزمان صلور مانتے تھے تو ان کے
 ہاں ہی جب ضابطہ قانونی کارروائی عمل میں لائی جاسکتی ہے۔ پھر گزارش ہے میں جوڑے
 میں ہوں

COACEHD
 9-10-017

اطلاع کے لیے اطلاع دہندہ کا دستخط ہوگا یا اس کی مہر یا نشان لگایا جائے گا۔ اور اس پر تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔ حروف الف یا ب سرخ روشنائی سے بالفاظ نام پر
 ایک ملزم یا شہر علی الترتیب واسطے باشندگان علاقہ غیر یا وسط ایشیا یا افغانستان جہاں سوزوں ہوں لکھنا چاہئے۔

(6)

ANNEXURE B,



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demisfbattagram@yahoo.com

No. 3046 - /Primary /2019/

Dated: 16 /07/2019

To

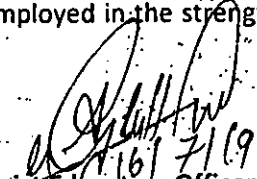
The Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject: **SUBMISSION OF REPORT IN RESPECT OF FAKE EMPLOYEES**

Memo

Kindly refer to the subject noted above it is stated that all the record in this office/school have been checked and no record found in respect of Mst. Zia GUI DM appeal No. 550/2018, Mst. Nighat Seema AT GGMS Khairabad Appeal No. 1380/2018 and Mst. Shama Begum PST GGPS Paimal Shareef, it is concluded that these teachers have never been employed in the strength of this office.

The report is hereby submitted for onward submission


District Education Officer (F)
Battagram

Endstt No. As above

Copy for information to the:-

- 1- Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
- 2- Account General Khyber Pakhtunkhwa, Peshawar.
- 3- District Accounts Officer Battagram with the same request.
- 4- Master file.


District Education Officer (F)
Battagram

Amirul W. C.

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IN THE COURT OF HANID KAMAL, JUDICIAL
MAGISTRATE-IV, CHARSAKDA.

Inquiry No. 112 dated 21.09.2017 through writ petition on 2023-P/2017

Statement of Adnan S/O Raz Muhammad R/O Saeed High Station
Korona, Charsadda, Tehsil & District Charsadda, u/s 164 Cr. P.C on
oath.

Stated that Mst. Nighat Secuni female teacher (AT) is my sister
After passing her matric examination and she continued her study in
Madhassa Ayisha Lillbanat which is registered with Wilful Madras and
obtained her Shuhadate Aulia degree which is equal to master degree in
Islamiat. After education, she and my father were in search of government
service, when my father met with one Ameen Clerk at Government High
School No. 01 Peshawar, who took Rs. 5,80,000/- from my father for getting
employment for my sister in education department, who handed over a
employment order No. 3564/70 dated 01.09.2009 to my father for
appointment of as AT at District Baitagram and then transferred her to
District Charsadda vide transfer order No. 1766/71 dated 16.11.2012 and
after that my sister was performing her duties as AT teacher in Government
Middle School Dada Killy, which is now upgraded to High School. As all
the above dealing was made in my presence, therefore, I know about the
fact, in proof thereof I produce a Photostat that in which all the detail is
mentioned and bears my father's signature. Now my father is dead and
through this inquiry I came to know that the above said Ameen Clerk has
committed fraud with us and handed over to us a bogus and fake
appointment & transfer orders. As other persons/staff was also involved in
the said fraud, therefore, I charge the clerk Ameen along with other staff
members and prayed for justice.

XX. Nil opportunity given

RD & ...
03.10.2017

Adnan
NIC No. 1701-5229337-5

(Hanid Kamal)
Judicial Magistrate-IV
Charsadda
Hanid Kamal
J.M. Charsadda

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BETTER COPY OF PAGE NO.
IN THE COURT OF HAMID KAMAL, JUDICIAL
MAGISTRATE-IV, CHARSADDA

Inquiry No, 112 dated 21.09.2017 through writ petition
No.2028-P/2007.

Statement of Adnan S/O Raz Muhammad R/O saeed Bagh Station
Koroona, Charsadda, Tehsil & District charsadda u/s 164 Cr. P.C
on oath.

Stated that Mst Nighat Seema female teacher (AT) is my
sister. After passing her matric examination and she continued her
study in Madrassa Ayisha Lilbanat which is registered with Wifaqul
Madaras and obtained her Shuhadat-e-Anila degree which is equal
to Master degree in Islamiat. After education , she and my father
were search of government sevice, when my father met with one
Ameen Clerk at Government High school No.01 Peshawar, who took
5,80,000/- from my father for getting employment for my sister in
education department, who handed over employment order No.
3964-70 dated 01.09.2009 to my father for appointment at as AT at
District Battagram and then transferred her to District charsadda
Vide transfer order No.1766-7 dated 16.11.2012 and after that my
sister was performing her duties as AT teacher in Government
Middle School Dadu killy, which is now upgard High school. As all
the above dealing was made in my presence, therefore. I know
about the fact, in proof thereof I produce a photostate chit in which
all the detail is mentioned and bears my father's signature. Now my
father is dead and through this inquiry I came to know that the
above said Ameen Clerk has committed fraud with us and handed
over to us a bogus and fake appointment & transfer order. As other
person/staff was also involed in the said fraud, therefore, I charge
the clerk Ameen alongwith other staff members and prayed for
justice

XX... Nil opportunity given.

RO & AC

03.10.2017

Adnan

NIC No 17101-5729337-5

(Hamid Kamal)
Judicial Magistrate-IV
Charsadda