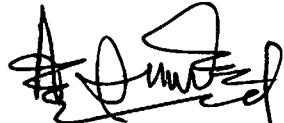


ORDER  
19.01.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakheil, Assistant Advocate General for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, passed in service appeal bearing No. 826/2019 "titled Mst Sadia Bibi Versus Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Civil Secretariat Peshawar and two others", we are inclined to accept the instant service appeal. The impugned orders are set aside and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs, file be consigned to record room.

ANNOUNCED  
19.01.2022



(AHMAD SULTAN TAREEN)  
CHAIRMAN



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

14.01.2022

Appellant present through representative.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Due to non-availability of Mr. Mian Muhammad Member (Executive), the case could not be heard. Adjourned. To come up for arguments on 19.01.2022 before D.B.




(Rozina Rehman)  
Member (J)

18.10.2021

Junior to counsel for the appellant and Mr. Muhammad Rasheed, DDA for the respondents present.

Due to general strike of the bar, counsel for the appellant is not in attendance today. To come up for arguments on 02.02.2022 before the D.B.

  
(Salah-ud-Din)  
Member(J)

  
Chairman

14-12-21

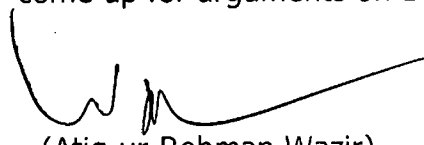
*DiB is on Tour case to come up  
For the same on Dated. 3-1-22*

*Reader*

03.01.2022

Junior to counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Former requests for adjournment due to engagement of learned senior counsel for the appellant before the Honourable High Court today. Request accorded. Case to come up for arguments on 14.01.2022 before the D.B.

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

  
Chairman

12.03.2021 Appellant present through counsel.

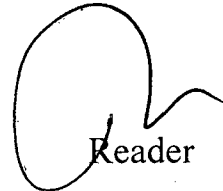
Kabir Ullah Khattak learned Additional Advocate General alongwith Roheen ADO (Litigation) and Mehtab Gul Law Officer for respondents present.

A request for adjournment was made by the learned A.A.G; granted. To come up for arguments on 14/04/2021 before D.B.

  
(Mian Muhammad)  
Member (E)

  
(Rozina Rehman)  
Member (J)

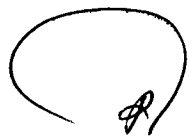
14.04.2021 Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 29.07.2021 for the same as before.

  
Reader

29.07.2021 Counsel for appellant present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.


Former made a request for adjournment; granted. To come up for arguments on 18.10.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman

17.08.2020

Due to summer vacations, the case is adjourned to 19.10.2020 for the same.

  
Reader

19.10.2020

Junior to counsel for the appellant and Addl. AG alongwith Abdul Wali, Superintendent for the respondents present.

The Bar is observing general strike today, therefore, the matter is adjourned <sup>to</sup> 04.12.2020 for hearing before the D.B.

  
(Mian Muhammad)  
Member

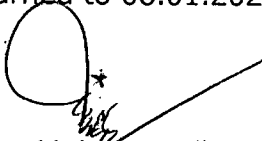
  
Chairman

04.12.2020

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

Request for adjournment is made due to engagement of learned senior counsel for the appellant before the Honourable Peshawar High Court in various cases today.

Adjourned to 08.01.2021 for hearing before the D.B.

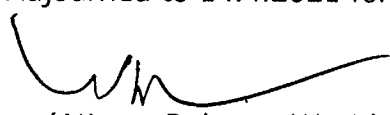
  
(Mian Muhammad)  
Member(E)

  
Chairman

08.01.2021

Junior to counsel for the appellant and Asstt. AG alongwith Hamid Saleem, Law Officer for the respondents present.

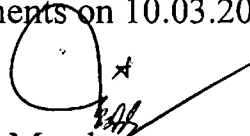
Former requests for adjournment on account of indisposition of learned senior counsel for the appellant. Adjourned to 14.4.2021 for hearing before the D.B.

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

  
Chairman

13.02.2020

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney alongwith Irfan Ali Assistant (for respondents No.1 & 2) present. Representative of respondents No.1 & 2 submitted reply. Adjournment requested. Adjourned To come up for arguments on 10.03.2020 before D.B.

  
Member

  
Member

10.03.2020

Learned counsel for the appellant present. Mr. Ziaullah learned Deputy District Attorney alongwith M/S Irfan Ali Assistant for respondent No. 1 & 2 and Mr. Iftikhar Bangash Superintendent for respondent No.3 present. Representative of the respondent No.3 submitted Para-wise comments. Learned counsel for the appellant submitted rejoinder which is placed on file. Adjournment requested. Adjourn. To come up for further proceedings/arguments on 14.05.2020 before D.B.

  
Member

  
Member

05.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 17.08.2020 before D.B.

  
Reader

09.10.2019

Counsel for the appellant and Addl. AG alongwith Irfanullah, Assistant for the respondents present.

Representative of respondents seeks further time. Adjourned to 13.11.2019 on which date requisite reply/comments shall positively be submitted.



Chairman

13.11.2019

Mr. Muhammad Shakeel, attorney for the appellant and Addl. AG present. No representative on behalf of the respondents is available.

Fresh notices be issued to the respondents for the next date. Adjourned to 12.12.2019 for submission of requisite written reply/comments by way of last chance.



Chairman

12.12.2019

Junior to counsel for the appellant present. Asst: AG alongwith Mr. Hayat Khan, AD for respondents present.

The representative of the respondents requests for further time to submit parawise comments on behalf of the respondents despite last opportunity, therefore, the case is posted to DB for arguments on 13.02.2020.



Chairman

30.07.2019

Counsel for the appellant present.

Contends that the appellant was appointed as Assistant District Education Officer (F) on 16.09.2016 whereafter she assumed the charge and started performing her duty as such. On 28.02.2019, the impugned order was issued whereby the appointment order of the appellant was declared null and void ab-initio. In addition, the District Education Officer concerned was required to recover salaries received by the appellant. The contents of the impugned order suggested that the appellant was never associated with the enquiry proceedings, while upon her appointment and performance of duty as ASDEO (F), certain valuable rights were created in her favour as a civil servant. Accordingly, she was to be treated under the applicable rules and was entitled to put forth her defense. The same was denied, it was added.

Appellant Deposited  
Security & Process Fee

8/18/19

In view of the available record and arguments of learned counsel, instant appeal is admitted for regular hearing. 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 18.09.2019 before S.B.

Alongwith the appeal an application for maintenance of status-quo has been submitted. Notice of the application be also given to the respondents for the date fixed.

  
Chairman

18.09.2019

Junior to counsel for the appellant and Addl. AG alongwith Roheen Naz, ADO and Irfan, Assistant for the respondents present.

Representatives of the respondents request for time for furnishing the reply/comments of the respondents. Adjourned to 09.10.2019 on which date the requisite reply shall positively be furnished.



  
Chairman



Form- A  
FORM OF ORDER SHEET

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

Case No.- 827/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/06/2019	<p>The appeal of Mst. Neelam presented today by Mr. Amin-ur-Rehman 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 24/6/19</p>
2-	26/06/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>31/07/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No. 827/2019

Mst. Neelam. ....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others .....Respondents

**I N D E X**

S.No.	Description of documents	Annex	Pages
1.	Service Appeal		1-4
2.	Application for Grant of Status Quo alongwith Affidavit		5-6
3.	Addresses of the parties		7
4.	CNIC	"A"	8
5.	Domicile Certificate	"B"	9-10
6.	Educational Testimonials	"C"	11-16
7.	Professional Degrees/Certificate	"D"	17-18
8.	Advertisement dated: 05.03.2015	"E"	19-20
9.	Recommendation dated: 10.08.2016 of KP PSC	"F"	21
10.	Medical Board Letter dated: 06.09.2016 alongwith Medical Certificate dated: 08.09.2016	"G"	22-23
11.	Appointment Notification dated: 16.09.2016	"H"	24
12.	Office Order dated: 24.09.2016 alongwith transfer of charge dated: 24.09.2016	"I"	25-26
13.	pay release certificate dated: 14.01.2017	"J"	27
14.	Recognition Certificate/Award dated: 01.02.2019	"K"	28
15.	Recognition Certificate/Award dated: 01.02.2019	"L"	29
16.	Recognition Certificate/Award dated: 14.12.2018	"M"	30
17.	Recognition Certificate/Award dated: 13.01.2017	"N"	31
18.	Recognition Certificate/Award dated: 04.11.2016	"O"	32
19.	Impugned Notification dated: 28.02.2019	"P"	33
20.	Departmental Appeals dated: 01.03.2019	"Q"	34
21.	Wakalatnama		35

Appellant   
Through  
**Amin ur Rehman Yusufzai**

  
**Sajjad Mehsud**

&

  
**Khalid Khan**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

①

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

Service Appeal No. 827/2019

Mst. Neelam D/o Fazli Malik, Ex-ASDEO (F) Swabi R/o Mohalla Kandar,  
Village & PO Rustam, Tehsil & District Mardan. .... **Appellant**  
Khyber Pakhtunkhwa Service Tribunal

....VERSUS....

Diary No. 888

Dated 24-6-2019  
Elementary & Secondary

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt. .... **Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING  
PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:**

NOTIFICATION ENDORSEMENT NO.6698-6704/F.No.A-17/  
ASDEOs/Neelam, DATED: 28.02.2019 OF RESPONDENT  
NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED:  
16.09.2016 OF THE APPELLANT WAS DISOWNED.

**PRAYER-IN-APPEAL:**

On Acceptance of Instant Appeal, the Impugned Notification dated 28.02.2019 of respondent No.2 alongwith pro and post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority and of no legal effect, hence be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Filed to-day  
Registrar  
24/6/19

**Respectfully Sheweth:**

1. That appellant is law abiding peaceful citizen of Khyber Pakhtunkhwa and permanent resident of Tribal District Mohmand.  
(Copies of CNIC and Domicile Certificate, are attached as Annexure "A" & "B" respectively)
2. That appellant is qualified upto BS (Hons) Botany and having passed B.Ed degree course alongwith Certificate of Teaching (C.T).  
(Copies of Educational Testimonials and Professional Degree/Certificate, are attached as Annexure "C" & "D", respectively)
3. That respondent No.3, invited applications for fifteen (15) Vacant Posts of Female ADOs, vide Advertisement No.02/2015, dated: 05.03.2015.  
(Copy of Advertisement is attached as Annexure "E")

4. That appellant, being qualified, applied for one of the aforementioned advertised posts of ADOs and gone through the entire process of selection successfully, eventually she was recommended by the KP PSC to the Govt of KP for the desired appointment, vide recommendation dated: 10.08.2016 and was subsequently referred to the Medical Board by respondent No.2, vide office letter dated: 06.09.2016 and was found Medically Fit, evident from Medical Certificate dated: 08.09.2016.  
**(Copies of, Recommendation dated: 10.08.2016 of KP PSC and Medical Board Letter dated: 06.09.2016 alongwith Medical Certificate dated: 08.09.2016, are attached as Annexure "F" & "G", respectively)**
  
5. That appellant, after completion of all codal/legal formalities, was appointed as ADEO/ASDEO (Female) BPS-16, on regular basis, in the Elementary & Secondary Education Department, Khyber Pakhtunkhwa, vide Notification Endorsement No.3013-70/A-17/ADEO(F)2015-16/Public Service Commission dated: 16.09.2016.  
**(Copy of Appointment Notification dated: 16.09.2016, is attached as Annexure "H")**
  
6. That appellant was subsequently adjusted against the vacant post of ADEO(F), at the office of the DEO(F) Razzar (Swabi), vide office order No.3517-21 Dated: 24.09.2016. Needless to add that prior to payment of salary, clearance Certificate regarding release of pay was issued on 14.01.2017.  
**(Copies of Office Order dated: 24.09.2016 alongwith transfer of charge dated: 24.09.2016 and pay release certificate dated: 14.01.2017, are attached as Annexures "I" & "J", respectively)**
  
7. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, evident from certificates of recognition dated: 01.02.2019, 14.12.2018, 13.01.2017 and 04.11.2016, however she has unilaterally been shunt-out from service vide impugned Notification dated: 28.02.2019 by respondent No.2 without due process and following the law/rules governing the subject.  
**(Copies of Recognition Certificates/Awards dated: 01.02.2019, 01.02.2019 14.12.2018, 13.01.2017 and 04.11.2016 and Impugned Notification dated: 28.02.2019, are attached as Annexures "K", "L" "M", "N", "O" & "P", respectively)**
  
8. That appellant preferred departmental appeal to respondent No.1, which was received in the office of respondent No.1, vide Diary No. 12343 dated: 01.03.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.  
**(Copies of Departmental Appeals dated: 01.03.2019, is attached as Annexure "Q")**
  
9. That appellant, being aggrieved of impugned notification dated: 28.02.2019 and not considering her departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

**GROUNDS:**

- A. That impugned Notification dated: 28.02.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor she has been provided equal protection of law, rather she has not been provided fair opportunity to defend herself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.
- C. That neither regular enquiry was conducted into the guilt of the appellant nor she has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterem-partem.
- D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.
- E. That appellant has served the department with zeal, devotion and to the best of her abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

**I. 2011 SCMR 1581**

“Appointment order found to be bogus/fake/irregular .... Validity ..... Such charge was vague, nonspecific and did not show any lapse on part of employee or commission of any fraud by him or non-possession of requisite qualification by him or his appointment to be made by an incompetent officer .... Department had not found performance of employee to be unsatisfactory .... Impugned order was set aside in circumstances”

**II. 2004 SCMR 303**

“Appointment of Civil Servants were made by Competent Authority. If prescribed procedure was not followed by the Concerned Authority the Civil Servants could not be blamed for what was to be performed and done by the Competent Authority. Supreme Court noted it with concern that in case the Civil Servants were to be removed then the same would amount to hitting them hard creating problems for the society at large considering each of the Civil Servants being the bread earner of his family. Appointing authorities had been acting mechanically without application of mind, therefore, the Civil Servant could not be made to suffer for whimsical and mechanical acts of the authorities.”

**III. 2016 SCMR 1299**

“The solution we have come out is simple, let them continue, if they besides the certificates or diplomas, issued by the council, possesses the

requisite or equivalent qualification. Let them all also continue who improve their qualification even thereafter. Those who could not improve their qualification up till now should improve it within a period of one year, which could be reckoned from the date of commencement of the next available academic session of the respective program.”



**IV. 2010 PLD SC 483**

“Principle of Audi-alterm-Partem was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, because no adverse action can be taken against a person without providing right of hearing to him”

F. That any other grounds, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 28.02.2019 of respondent No.2 alongwith pro and post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority and of no legal effect, hence be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Tribunal in circumstances of the case may also be granted.

Appellant   
Through 

**Amin ur Rehman Yusufzai**

**Sajjad Mehsud**

&




**Khalid Khan**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar  
Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

**VERIFICATION:**

Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

  
  
Department 

5

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

C.M No.\_\_\_\_/2019

In

Service Appeal No.\_\_\_\_/2019

Mst. Neelam.....**Appellant**

**....VERSUS....**

Govt of Khyber Pakhtukhwa & 02 others.....**Respondents**

**APPLICATION FOR STATUS-QUO TILL FINAL DECISION OF THE  
TITLED SERVICE APPEAL**

Respectfully Sheweth:-

1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant applicant.
3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted she will suffer irreparable loss.
4. That applicant has got good prima facie case in her favour and is very much sanguine of its success. Moreover, balance of convenience also lies in her favor.
5. That there is no legal bar to grant the subject permission, rather grant of status quo will prevent the titled appeal from being infructuous.

It is therefore, most humbly prayed that on acceptance of instant application, Status-quo may please be ordered to be maintained till final decision of the titled appeal, so as to secure the ends of justice.

Applicant   
Through

**Amin ur Rehman Yusufzai**

&

  
**Sajjad Mensud**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

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

C.M No.\_\_\_\_/2019

In

Service Appeal No.\_\_\_\_/2019

Mst. Neelam.....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others.....Respondents

**AFFIDAVIT**

I, Mst. Neelam D/o Fazli Malik, Ex-ASDEO (F) Swabi R/o Mohalla Kandari, Village & P.O Rustam, Tehsil & District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying Petition are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

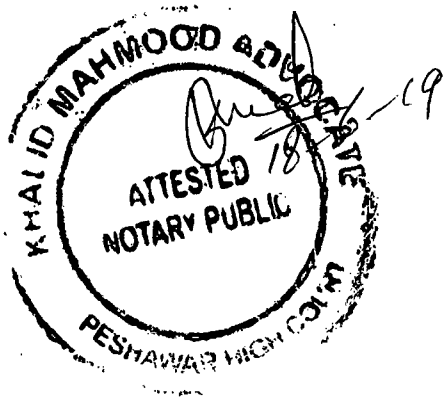
Identified By:

Amin-ur-Rehman Yusufzai  
Advocate, Peshawar

DEPONENT

CNIC #: 16101-2942484-2

03456078132





7

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

Service Appeal No.\_\_\_\_/2019

Mst. Neelam.....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others .....Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Mst. Neelam D/o Fazli Malik, Ex-ASDEO (F) Swabi R/o Mohalla Kandari, Village & P.O Rustam, Tehsil & District Mardan

**RESPONDENTS:**

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt

Appellant  
Through

**Amin ur Rehman Yusufzai**

**Sajjad Mehsud**

**&**

**Khalid Khan**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

ANNEX "A" (8)



دستخط مال کارڈ

حکومت پاکستان

قومی شناختی کارڈ  
16101-2942484-2



نام: سلیم  
پتو: گلبرگ  
کراچی

علی ارشد حکیم  
شناختی نمبر: 01/01/1990

دستخط مستشار منزل



شناختی نمبر: 16101-2942484-2  
V4S5DG

تاریخ اجراء: 11/11/2010

مستقل پتہ: ایوانا



تاریخ ترمیم: 31/10/2020  
محکمہ کارڈس نے پرکریبی لیٹر میں ڈال دیں



ATTESTED

ANNEX "B"

9

OFFICE OF THE  
POLITICAL AGENT MOHMAND AGENCY  
Domicile Certificate

Political Agent  
Mohmand Agency

Certified that Mr./Miss NEELAM

Son/Daughter of FARU MALIK

Belongs to a recognized tribe of Mohmand Agency

section Safi Sub section Shinwari

Residence / Village Sheikh Baba

and his / her father is a permanent bonafide of the tribal area of Mohmand Agency.  
He / She is an eligible candidate to avail himself / herself of the Seats reserved for  
FATA Mohmand Agency.

Category B3

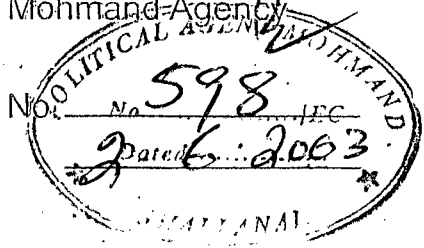


Political Naib Tehsildar

Countersigned

No. 132 Dated 21/6/2003

Political Agent  
Mohmand Agency



Assistant Political Agent  
Mohmand Agency

No. 302 Dated 3/5/2003

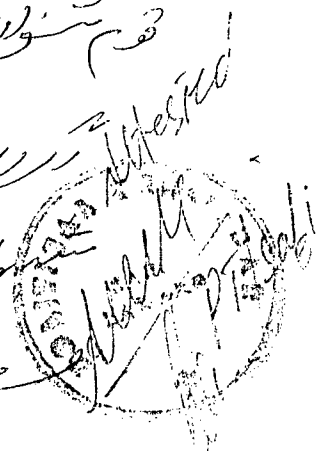
**ATTESTED**

بیت مکان قوم شہزادہ صافی

بیت مکان قوم شہزادہ صافی  
سہ ماہی دفتر فضل مائد قوم شہزادہ صافی کو ذرا کھڑ

میں جو ہے۔  
میں جو ہے۔  
میں جو ہے۔  
میں جو ہے۔  
میں جو ہے۔

قوم شہزادہ صافی  
قوم شہزادہ صافی  
قوم شہزادہ صافی  
قوم شہزادہ صافی



- مستفصل قلمی  
مستفصل قلمی  
مستفصل قلمی  
مستفصل قلمی
- ۱۹۲-۲۸-۵۹۳۵۲
- ۱۹۲-۴۸-۵۸۲۳۵
- ۱۹۲-۹۳-۱۰۷۹۳۰
- ۱۹۲-۳۰-۵۰۳۵۹۱

Serial No. 000034

Reg. No. \_\_\_\_\_  
Roll No. \_\_\_\_\_ 12

# Abdul Wali Khan University

Mardan, Pakistan



ANNEX C

11

The University in recognition of the fulfilment of prescribed requirements has conferred upon  
Mr. / Ms. NEELAM Son / Daughter of FAZLI MALIK

The Degree of

## BACHELOR OF SCIENCE (HONOURS) IN BOTANY

in the examination held in June 2013 session Fall 2009-13

He / She was placed in 3.61 Division / Grade / CCPA

The examination was taken as a whole / in Parts.

Controller of Examinations

Registrar

Vice Chancellor

Result Declaration Date 13-06-2013

*[Handwritten signature]*



# ABDUL WALI KHAN UNIVERSITY

MARDAN, PAKISTAN

## TRANSCRIPT

THE RUSTAM MODEL SCHOOL AND COLLEGE, RUSTAM  
B.Ed

Name: Neelam

Father's Name: Fazli Malik

Roll No: 8005

Registration No: 09-AWKUM-Bot-820

1st Semester( Fall, 2013)								
Title of Course	Total Marks	Marks Obtaine	CR Hrs	Grade	NG	GP	GPA	Remarks
Perspective of Education	100	83	3	A-	3.5	10.5		
Curriculum & Instruction	100	87	3	A	3.8	11.25		
School Organization & Management	100	73	3	B	3	9		
Computer Literacy	100	74	3	B	3	9		
Islamic Education	50	42	2	A-	3.5	7		
Functional English	50	38	2	B+	3.3	6.5		
<b>TOTAL</b>	<b>500</b>	<b>397</b>	<b>16</b>			<b>53.25</b>	<b>3.33</b>	<b>Promoted</b>
2nd Semester (Spring, 2014)								
Title of Course	Total Marks	Marks Obtaine	CR Hrs	Grade	NG	GP	GPA	Remarks
Educational Psychology	100	78	3	B+	3.3	9.75		
Classroom Assesment	100	71	3	B	3	9		
Teaching of English	100	81	3	A-	3.5	10.5		
Teaching of Pak Studies	100	79	3	B+	3.3	9.75		
Project	100	65	3	B-	2.8	8.25		
Teaching Practice	200	150	6	B+	3.3	19.5		
<b>TOTAL</b>	<b>700</b>	<b>524</b>	<b>21</b>			<b>66.75</b>	<b>3.18</b>	<b>Passed</b>

CGPA

3.24

Errors & Omissions are subject to subsequent rectification

Result Declaration Date: Sep 22, 2014.

Prepared by: Computer Cell

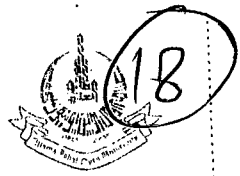
Checked by: Ijaz Ahmad

*Ijaz Ahmad*

Controller of Examinations

**ATTESTED**

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 167455

## PROVISIONAL RESULT CARD

Name: NEELAM  
 Father's Name: FAZLI MALIK  
 Address: MEH KANDAR VILL AND P/O RUSTAM

Roll No. AX683112  
 Registration No. 14NMNO0379  
 Final Semester AUT-2014

Tehsil: MARDAN  
 District: MARDAN

has successfully completed **CERTIFICATE OF TEACHING**

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 14	0630	TEACHING STRATEGIES & EVALUATION	100	67
SPR- 14	0633	SCHOOL ORGANIZATION	100	73
SPR- 14	0632	EDUCATIONAL PSYCHOLOGY	100	63
SPR- 14	0631	DIMENSIONS IN EDUCATION	100	71
AUT- 14	0634	ENGLISH AND ITS TEACHING	100	63
AUT- 14	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	87
AUT- 14	0607	SCIENCE AND ITS TEACHING	100	71
AUT- 14	0635	ISLAMIAT AND ITS TEACHING	100	63
AUT- 14	0605	SOCIAL STUDIES & ITS TEACHING	100	60

CREDITS: 5

Total Marks / Obtained

900 / 618

Result Declared on: JULY 14, 2015

Percentage / Grade

69

B

Date of issue

AUGUST 07, 2015

**Controller of Examinations**

**Disclaimer:**

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

**ATTESTED**

Annex 'E'

19

**KHYBER PAKHTUNKHWA PUBLIC SERVICE  
COMMISSION**  
**2- Fort Road Peshawar Cantt:**  
**Website: [www.kppsc.gov.pk](http://www.kppsc.gov.pk)**  
**Tele: Nos. 091-9214131, 9213563, 9213750, 9212897**

Dated: 05.03.2015

**ADVERTISEMENT No. 02 / 2015.**

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **03.04.2015** (candidates applying from abroad by **17.04.2015**). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

<b>AGRICULTURE LIVESTOCK &amp; COOPERATIVE DEPTT:</b>	
1.	<p><b>TWO (02) POSTS OF FEMALE RESEARCH OFFICER HORTICULTURE FOR (WOMEN QUOTA) IN AGRICULTURE (RESEARCH).</b></p> <p><b>QUALIFICATION:</b> 2<sup>ND</sup> class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p><b>AGE LIMIT:</b> 21 to 32 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Female. <b>ALLOCATION:</b> Merit.</p>
2.	<p><b>TWO (02) POSTS OF RESEARCH OFFICER PLANT PATHOLOGY IN AGRICULTURE (RESEARCH).</b></p> <p><b>QUALIFICATION:</b> 2<sup>ND</sup> class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p><b>AGE LIMIT:</b> 21 to 32 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> One each to Merit &amp; Zone-5.</p>
3.	<p><b>THREE (03) POSTS OF RESEARCH OFFICER FOOD TECHNOLOGY IN AGRICULTURE (RESEARCH).</b></p> <p><b>QUALIFICATION:</b> 2<sup>ND</sup> class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p><b>AGE LIMIT:</b> 21 to 32 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> One each to Merit, Zone-1 &amp; Zone-2.</p>
4.	<p><b>FOUR (04) POSTS OF RESEARCH OFFICER CHEMISTRY IN AGRICULTURE (RESEARCH).</b></p> <p><b>QUALIFICATION:</b> 2<sup>ND</sup> class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p><b>AGE LIMIT:</b> 21 to 32 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> One each to Merit, Zone-2, Zone-3 &amp; Zone-4.</p>

ADVERTISED



23.	<p><b>TWO (02) LEFTOVER POSTS OF DRAFTSMAN IN C&amp;W DEPARMTENT.</b></p> <p><b>QUALIFICATION:</b> Secondary School Certificate from a recognized Board and (ii) Two (02) years certificate course in Civil Draftsmanship from a recognized institute/ Board of Technical Education.</p> <p><b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-11 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> One each to Zone-3 &amp; 5.</p>
<b>ELEMENTARY &amp; SECONDARY EDUCATION DEPARTMENT</b>	
24.	<p><b>FIVE (05) (LEFTOVER) POSTS OF FEMALE SUBJECT SPECALISTS (PHYSICS) IN ELEMENTARY &amp; SECONDARY EDUCATION DEPARTMENT.</b></p> <p><b>QUALIFICATION:</b> 1. Master's Degree in the relevant subject with Bachelor of Education or M.Ed or Master of Education (Industrial Arts or Business Education) or M.A Education or Equivalent of Qualification from recognized University. <b>OR</b> 2. If no suitable candidate possessing the above qualification is available, a candidate possessing Master's Degree in the relevant subject may be appointed as Subject Specialist to the condition that he/she shall acquire the requisite qualification as specified above within three years from the date of his appointment, failing which his service will be terminated without notice irrespective of any provision of the rules for the time being enforce.</p> <p><b>Note:</b> - The person appointed as Subject Specialist shall be transferable only to a post relevant to his subject.</p> <p><b>AGE LIMIT:</b> 25 to 40 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Female. <b>ALLOCATION:</b> Zone-1.</p>
25.	<p><b>ONE (01) (LEFTOVER) POST OF FEMALE SUBJECT SPECALIST STATISTICS (DISABLE QUOTA).</b></p> <p><b>QUALIFICATION:</b> 1. Master's Degree in the relevant subject with Bachelor of Education or M.Ed or Master of Education (Industrial Arts or Business Education) or M.A Education or Equivalent of Qualification from recognized University. <b>OR</b> 2. If no suitable candidate possessing the above qualification is available, a candidate possessing Master's Degree in the relevant subject may be appointed as Subject Specialist to the condition that he/she shall acquire the requisite qualification as specified above within three years from the date of his appointment, failing which his service will be terminated without notice irrespective of any provision of the rules for the time being enforce.</p> <p><b>Note:</b> - The person appointed as Subject Specialist shall be transferable only to a post relevant to his subject.</p> <p><b>AGE LIMIT:</b> 25 to 40 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Female. <b>ALLOCATION:</b> Merit.</p>
26.	<p><b>FIFTEEN (15) (LEFTOVER) POSTS OF FEMALE A.D.O.</b></p> <p><b>QUALIFICATION:</b> BA/ B.Sc 2<sup>nd</sup> Division with B.Ed and Five years teaching/ administrative experience in Govt: recognized education institution/ office.</p> <p><b>AGE LIMIT:</b> 21 to 35 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Female. <b>ALLOCATION:</b> Zone-1.</p>
<b>ENVIRONMENT DEPARTMENT</b>	
27.	<p><b>FIVE (05) POSTS OF RANGE OFFICER.</b></p> <p><b>QUALIFICATION:</b> B.Sc in Wildlife Management/ Wildlife Ecology/ Wildlife Biology from a recognized university or institute with at least 2<sup>nd</sup> Division or (ii) B.Sc Forestry from Pakistan Forest Institute Peshawar in 2<sup>nd</sup> Division or (iii) B.Sc from a</p>

ATTENTION

ANNEX F

21



KHYBERPAKHTUNKHWA PUBLIC SERVICE COMMISSION  
2 Fort Road, Peshawar Cantt (Near Governor House)  
PH No. 9213563  
9213750, 9214131  
Fax No. 9211796  
No. PSC-SR-IX/15572

Dated ... 2/28/2016

To,

The Secretary to  
Govt of Khyber Pakhtunkhwa  
Elementary & Secondary Education Department.

Subject: Recruitment of 15 Female ADO (B-16) In Elementary & Secondary Education Deptt: Adv: No.2/2015 & S.No. 26

Dear Sir,

In continuation to this office letter No.012399 dated 16.3.2016 and to state that the commission recommends Miss Neelam D/O Fazal Malik of Mohmand Agency to the Govt for appointment against the subject cited post.


2 Recommendation in favour of the recommendee is provisional subject to her medical fitness, verification of all documents and perusal of her ACR/PER, which may be provided at the earliest.

3 Recommendation of only one (01) candidate has been kept pending due to her vital deficiencies.

4 Original application (with enclosure) of the above one selectee is enclosed herewith for your record.

Kindly acknowledge receipt the same.

~~ATTESTED~~

Yours Faithfully,  
  
(Ghulam Dastagir Ahmad)  
Director Recruitment

ANNEX G

22



**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**

NO. \_\_\_\_\_/A-17/ADEO/ASDEO/F/2015-16/PSC

Dated Peshawar the 6/9/2016

To

The Director General Health  
Khyber Pakhtunkhwa Peshawar.

**SUBJECT:- RECRUITMENT OF 15 FEMALE ADO (B-16) IN ELEMENTARY AND**  
**SECONDARY EDUCATION DEPARTMENT ADVER: NO. 2/2015**  
**AND S.NO.26**

**Memo:-**

I am directed to refer to the subject cited above and to say that Mst. Neelam D/O Fazal Malik Mohmand Agency, resident of Zone-I has been recommended by the Khyber Pakhtunkhwa Public Service Commission (PSC) for appointment as Assistant District Education Officer (F) in B-16 in the Education Department.

It is therefore requested that Medical Board for the above candidates may very kindly be arranged and findings of the Standing Medical Board thereof may be communicated to this office as an early date for further necessary action please.

Assistant Director Establishment(F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst.No. 15860

Copy forwarded to the:-

- 1- Section Officer(Primary) Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department w/r to his No.SO(PE)E&SED/3-9/Public Service Commission/2016 dated 28-08-2016.
- 2- Mst. Neelam D/O Fazal Malik Mohmand Agency
- 3- PA to Director E&SE Local Office.

Assistant Director Establishment(F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

\*/Noor/16/\*

**ATTESTED**

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### MEDICAL CERTIFICATE

Name of official NEELAM ✓  
 Caste or race Abghan  
 Father's name FAZAL MALIK ✓  
 Residence Mohalla Kandax village  
P.O. Rustam Distt. Taji Mardan  
 Date of birth 01-01-1950  
 Exact height by measurement 5'5"  
 Personal mark of identification Nic  
 Signature of the official [Signature]  
 Signature of head of office \_\_\_\_\_

Seal of office \_\_\_\_\_

I do hereby certify that I have examined Mr. NEELAM a candidate for employment in the Office of the Education Department (ADD) and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nic

I do not consider this as disqualification for employment in the office of the Edu. Department  
 His age according to his own statement 26 year and by appearance about Twenty Six year.

[Signature]  
 MEDICAL SUPERINTENDENT,

CIVIL HOSPITAL Medical Department  
Police/Service Hospital  
Peshawar.

[Signature]  
 Secretary  
 Standing Medical Board  
 Police/Service, Hospital  
 Peshawar.

LEFT HAND THUMB AND FINGER IMPRESSIONS

# ATTESTED

[Signature]  
 Physician  
 Police/Service, Hospital  
 Peshawar

[Impression]  
[Signature]



**Directorate of Elementary and Secondary Education**  
**Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936  
E-mail [desekpk@yahoo.com](mailto:desekpk@yahoo.com)

ANNEX H  
24

**NOTIFICATION**

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the candidate is hereby ordered against the post of ADEO/ASDEO(Female) BPS-16 (Rs.12910-1035-34960) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Management Cadre on the terms and condition given below with immediate effect and further their services are placed at the disposal of DEO(F) concerned for further posting against vacant ADEO/ASDEO(F) posts.

S. #	Name	Father Name	Domicile	Zone	Permanent address	Remarks
1	Mst. Neelam	Fazal Malik	Mohmand Agency	I	Mohallah Kandar Village & P/O Rustam District & Tehsil Mardan	Service is placed at the disposal of DEO(F) Swabi for further posting against vacant ADEO/ASDEO posts.

**TERMS AND CONDITIONS:-**

- 1- Her service will be considered regular under the Khyber Pakhtunkhwa Civil Servant Amendment Act.2013 and Finance Department Circular No SOSR-III/FD/12-1/2005 dated 27-02-2013.
- 2- Her service is liable to termination on one months notice from either side. In case of resignation without notice her one month pay/allowances shall be forfeited to the Government.
- 3- She should join the post within 30 days of the issuance of this notification. In case of failure to join her post within one month of the issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 4- She should be on probation for a period of one year extendable for another one year.
- 5- She will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 6- Her service can be terminated at any time, in case her performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
- 7- Charge report should be submitted to all concerned.
- 8- The DEO (F) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of her posting orders.
- 9- The DEO(F) concerned will verify her documents before release of pay.
- 10- Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
- 11- No TA/DA etc will be allowed to the appointee for joining her duty.

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

Endst.No. 3013-20/A-17/ADEO(F) 2015-16/Public Service Commission Dated Peshawar the 16/9/2016

Copy of the above is forwarded to the:-

- 1- District Education Officer(Female) Swabi
- 2- District Account Officer, Swabi
- 3- Sub Divisional Education Officer(F) Swabi
- 4- Mistress concerned
- 5- PA to Director (E&SE) Local Office.
- 6- Master file.

**ATTESTED**

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

ANNEX 'I'

25



DISTRICT EDUCATION OFFICE (FEMALE) SWABI  
(Office phone Fax No 0938280339, [emisfswabi@yahoo.com](mailto:emisfswabi@yahoo.com))

Adjustment/posting order

Consequent upon the appointment against ADEO/ASDEO (Female) Post in BPS-16 on the term and condition given in the appointment order issued vide Director (E&SE) Khyber Pakhtunkhwa Peshawar Endost No.3013-20 Dated 16-9-2016.

Mst Neelam D/o Fazal Malik ASDEO is hereby adjusted/Posted against newly created ASDEO (Female) post in the office of SDEO (Female) Razzar in the best interest of public service from the date of her taking over charge.

(NAGHIMANA SARDAR)  
District Education Officer,  
(Female) Swabi

Endst: No: 3517-21 /dated: 24/9 /2016

Copy of the above is forwarded to the: -

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer Swabi
3. District Accounts Officer Swabi.
4. SDEO Concerned.
5. ADO B&A Local Office.

District Education Officer,  
Swabi (Female) Swabi

~~ATTESTED~~

**CERTIFICATE OF TRNSFER OF CHARGE**

1. Certified that we have on the fore/afternoon of this day respectively made over and received charge of this office of the ASDEO (F)Post at SDEO(F) Swabi,vide Director E&SE Khyber PAKhtunkhwa Peshawar Notification Endst No.3013-20/A-17/ADEO(F) 2015-16/Public Service Commission Dated Swabi the 16-09-2016 & adjustment order issued vide DEO(F) Swabi Endst No.3517-21 Dated Swabi the 24-09-2016.
2. Particulars of cash and important and confidential documents handed over and noted on the reversers

Signature of relieved  
 Government Servant ( Newly Created posts )  
 Designation:- ASDEO (Female)

Station:- SDEO (F) Razzar Swabi

Signature of relieving  
 Government Servant ( NEELAM )  
 Designation:- ASDEO (Female)

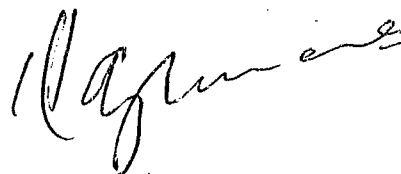
Dated:- 26-09-2016 (F.N)

**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE SWABI.**

Endst No. 3553-59/Dated 26/9/ /2016.

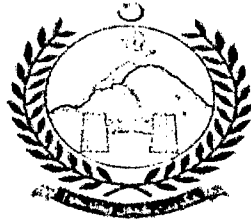
Copy of the above is forwarded for information and necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawa
2. Deputy Commissioner Swabi.
3. District Accounts Officer Swabi.
4. SDEO(Female) Razzar Swabi.
5. District Monitoring Officer Swabi
6. Budget & Accounts Officer Local Office
7. Superintendent local office.
8. P/File of official concerned.



**District Education Officer  
 (Female) Swabi.**

**ATTESTED**



ANNEX J

97

**DISTRICT EDUCATION OFFICE (FEMALE) SWABI**  
(Office phone Fax No 0938280339, [emisfswabi@yahoo.com](mailto:emisfswabi@yahoo.com))

**RELEASE OF PAY: -**

Consequent upon "the documents of the following officers" have been verified departmentally from the concerned Board/University /Departments. In this connection the pay release sanction is hereby accorded from the date stated against each name.

S.No	Name of Officer	Father Name	Name of Office	Date from which pay released
1.	Neelam, ASDEO(F) Razzar	Fazal Malik	SDE (F) Razzar	26-9-2016

(NAGHMANA SARDAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE) SWABI

Endst: No., 236-C /

Dated Swabi the 14-1- /2017

Copy forwarded for information and necessary action to the:

1. Director E & Secy: Edu: KP Peshawar
2. District Accounts Officer Swabi.
3. S.D.E.O (Female) Razzar.
4. Official concerned.

DISTRICT EDUCATION OFFICER  
931 (FEMALE) SWABI

**ATTESTED**



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# Certificate of Recognition

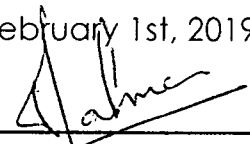
## INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of November 2018  
to

**Ms. Neelum**

ASDEO (Female) – Circle Roshanpura  
for performance in improving education service delivery.

Date: February 1st, 2019



Salman Khan Lodhi  
Deputy Commissioner, Swabi



ATTESTED



**ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT,  
GOVERNMENT OF KHYBER  
PAKHTUNKHWA**

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# Certificate of Recognition

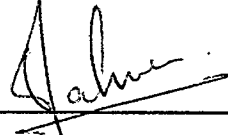
## INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of December 2018  
to

MS. NEELUM

ASDEO (Female) – Circle Roshanpora  
for performance in improving education service delivery.

Date: February 1st, 2019



Salman Khan Lodhi  
Deputy Commissioner, Swabi



ATTESTED



**ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT,  
GOVERNMENT OF KHYBER  
PAKHTUNKHWA**

36

ANNEX

# Certificate of Recognition

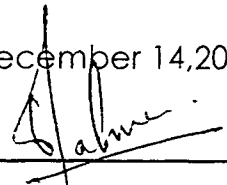
## INTRA-DISTRICT PERFORMANCE SCORECARD

is hereby awarded for the month of October 2018  
to

**Ms. Neelum**

ASDEO (Female) – Circle Roshanpura  
for performance in improving education service delivery.

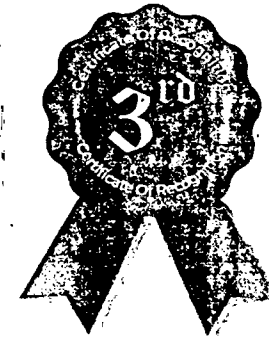
Date: December 14, 2018



Salman Khan Lodhi  
Deputy Commissioner, Swabi



**ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT,  
GOVERNMENT OF KHYBER  
PAKHTUNKHWA**



ATTESIED

31

Annex "N"



No. TRG/PITE/911/(2017)

# Pakistan Academy for Rural Development Peshawar

It is certified that


Neelam

has attended Five-Day Training Course in Collaboration with PITE

on

“Education Planning”

held at PARD from January 09-13, 2017

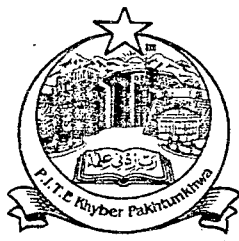
  
**Director**  
Provincial Institute for  
Teacher Education KP

  
**(Nighat Mehroze)**  
Director General PARD

**ATTESTED**

ANNEX "D"

37



No. TRG/PITE/894/(2016)

# Pakistan Academy for Rural Development Peshawar

It is certified that

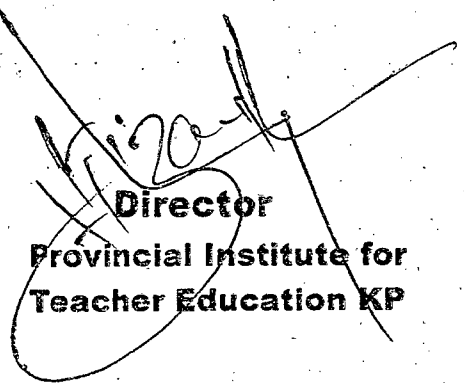
Neelam


has attended Five-Day Training Course in Collaboration with PITE

on

**"Education Management"**

held at PARD from October 31 to November 04, 2016

  
**Director**  
Provincial Institute for  
Teacher Education KP

  
**(Nighat Mehroze)**  
Director General PARD

**ATTESTED**

**NOTIFICATION**

- 1- WHEREAS, One Mst. Neelam D/O Fazal Malik domiciled Mohamand Agency resident of Mohallah Kandar Village & P/O Rustam Tehsil & District Mardan who herself adjusted as ASDEO (Female) in District Swabi vide Notification No.3013-20/A-17/ADEO(F)2015-16/Public Service Commission dated 16/09/2016 upon the production of fake & bogus appointment order not issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa.
- 2- AND WHEREAS, the competent authority had directed the above said accused ASDEO to produce authentic/verified service record from the concerned authorities but she failed to comply with the legitimate directions of high-up's regarding production of requisite authentic documents.
- 3- AND WHEREAS, further an inquiry committee was constituted by the competent authority vide No.6979-82 dated 25-01-2019 who have gone through the entire case record and it has been proved that the said recommendation letter of the Commission for the afore said post of ADEO(F) advertised vide Public Service Commission Khyber Pakhtunkhwa Peshawar advertisement No.2/2015 Sr. 26 was turned out fake & bogus.
- 4- AND WHEREAS, it has come into the notice of the competent authority that Mst. Neelam D/O Fazal Malik having no legal status of the said appointment order as well as the recommendation letter of Public Service Commission which has been proved fake & bogus vide Public Service Commission Khyber Pakhtunkhwa Peshawar letter NO.PSC-/IX 003780 dated 20/02/2019.
- 5- NOW THEREFORE, under the mandatory provisions and power conferred under the section 20 & 21 of General Clauses Act 1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in respect of above mentioned ADEOs/ASDEOs which was found fake/bogus, their appointment /adjustment Notification No. 3013-20 dated 16-09-2016 is here by "Disowned" ab initio and with the direction to the District Education Officer concerned to recover salaries and other allied benefits drawn by Mst. Neelam D/O Fazal Malik in the interest of Public Service.

6698-6704

Endst: No. \_\_\_\_\_/F.No.A-17/ASDEOs/Neelam

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar  
Dated Peshawar the 28/9 2019.

Copy forwarded with the request to take legal action and recover the outstanding amount from the accused to the :-

1. Accountant General, Khyber Pakhtunkhwa Peshawar with the request to direct the DAOs concerned for appropriate action.
2. Director Anti Corruption, Hayat Abad Khyber Pakhtunkhwa Peshawar.
3. Assistant Director Anti Corruption, District Swabi.
4. District Education Officer (Female) concerned with the direction to take necessary steps for the recovery of outstanding amount against the fake & bogus accused ASDEO (Female) concerned.
5. District Accounts officer concerned with the request to cooperate in the matter.
6. Section Officer (S/F) E&SED, Khyber Pakhtunkhwa.
7. P.S to sectary E&SED, Khyber Pakhtunkhwa.
8. P.A to Director E&SED, Khyber Pakhtunkhwa.

**ATTESTED**

Deputy Director (F/Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

کریڈٹ بنیاد سیکرٹری د+E ایجوکیشن ڈیپارٹمنٹ لاہور  
درخواست برائے اپیل

12343  
1/3/19

جناب عالی

گزارش یہ ہے کہ میں نے بذریعہ درخواست 20-13-30

تاریخ 16-2-2016 کو ایجوکیشن ڈسٹرکٹ صوبائی میں

کمیٹی کے ASDEO تعینات کر دی گئی۔

اور مورخہ 19-02-28 کو سروس سے Withdraw

کی گئی۔

جناب! مجھے تو باقاعدہ بیلٹ سروس کمیشن نے  
Recommend کی ہے۔ اور ڈاکٹر کمرنگ اور محترمی اینڈ سیکرٹری

سروس جاری کی گئی۔ جبکہ ڈاکٹر کمرنگ نے ایجوکیشن سے مجھے تبدیل کرنے کے لیے

سروس جاری کی ہے۔ اور میں نے ایجوکیشن سروس ہسپتال لاہور سے رکن

ڈاکٹر کمرنگ نے APPI کی سروس جاری کی۔ اور میں نے باقاعدہ سروس

جاری کی۔ لیکن Withdraw کا عرصہ گزر جانے کے بعد مجھے

کا ادور دیا گیا۔ میں در لیٹن و حیران ہو گئی۔ کہ اگر ایسا کیوں؟

جناب! آپ صاحبان نے تمہاری فرمائش کو اسی سروس

پر بحال کر کے جواب داریں قابل اس لیے ہے۔

مورخہ 19-02-28

یا العارضہ :-

مسماة نسیم بی بی  
EXASDEO  
طیبتی ڈسٹرکٹ صوبائی

ATTESTED