BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR AT CAMP COURT, ABBOTTABAD

Service Appeal No. 1128/2018

Date of Institution ... 30.08.2018
Date of Decision ... 17.02.2021

Zahir Shah son of Syed Badshah Caste Syed C.T Teacher Government High School, Balakot, resident of Garllat Tehsil Balakot, District Mansehra.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar and two others.

... (Respondents)

Malik Ishfaq Ahmed Jilani, Advocate ... For appellant.

Noor Zaman Khan Khattak, District Attorney ... For respondents.

ROZINA REHMAN ... MEMBER (J)
ATIQ-UR-REHMAN WAZIR ... MEMBER (E)

JUDGMENT

ROZINA REHMAN, MEMBER : Brief facts of the case are that appellant was appointed as CT Teacher at Government High School Boi in the year 1983. He proceeded to Saudi Arabia on Ex-Pakistan Leave in the year 1997 and returned back in the year 2000. He was not properly treated by

respondent No.3 who refused to pay salary, therefore, he filed an appeal on 28.12.2013. During the pendency of departmental appeal, he was issued with charge sheet and statement of allegations. The departmental appeal was not responded to, therefore, Service Appeal No.528/2014 was filed which was disposed on 17.01.2018 with direction to respondents to decide the pending appeal of the appellant and complete the pending disciplinary proceedings. That appeal was rejected. He then filed an appeal before the competent authority against the impugned order which was not responded to, hence, the instant service appeal.

2. Learned counsel for appellant argued that Ex-Pakistan Leave was properly sanctioned and approved by the competent authority where-after he proceeded to Saudi Arabia and returned back in the year 2000. That he properly submitted arrival report and started to perform his professional duties at the posted school. He argued that disciplinary proceedings which were initiated on the basis of charge sheet, were illegal and a detailed reply was submitted by the appellant but the same was not properly decided. He submitted that the appellant was neither suspended nor any sort of punishment was imposed upon the appellant in consequence of the disciplinary action initiated on the charge sheet dated 01.04.2015 and even till date, the service of appellant is intact and no adverse action was taken against him and lastly, he submitted that the impugned order was passed without affording an opportunity to the appellant, therefore, the same is illegal and void ab-initio and liable to be set aside.

3. Conversely, learned District Attorney argued that no record of the appellant was found at GHS Balakot and that he never applied for any kind of leave. He submitted that statement of different teachers were recorded

by the inquiry committee and are available on record who all denied the service of appellant and lastly, he submitted that as per report of the inquiry committee, the appellant did not serve at GHS Balakot after 1990 as he failed to provide the record of application for adjustment and sanction of leave, therefore, it was rightly recommended by the inquiry committee that appellant does not deserve to be reinstated in service after the gap of 25 years. He, therefore, requested for dismissal of instant appeal.

4. We have heard learned counsel for the parties and perused the record. It would be important to mention that the appellant hails from Bala Kot, where a catastrophic earthquake in the year 2005 caused huge damage and where the relevant record pertaining to appellant in possession of both parties also destroyed, hence we mostly relied on the available record. Appellant himself admitted that he proceeded to Saudi Arabia in the year 1997 and returned in the year 2000. Nothing is available on record to ascertain as to whether the appellant obtained NOC for proceeding abroad or otherwise. Neither any application seeking NOC nor Passport was produced before the Tribunal. After a long slumber, he surfaced in 2013 by filing a departmental appeal, which was turned down by respondents being barred by time. We are of the considered opinion that appellant failed to produce any document in support of his service right from 1990 till date. As per appellant, he returned back in the year 2000 and started to perform his duty at Government High School Balakot but nothing was produced in black & white in order to show his arrival report in the year 2000 in the said school. He failed to show his service book as well as his salary slip and after return to Pakistan in the year 2000, departmental appeal was filed on 28.12.2013 which is badly time barred

where-after he knocked at the door of Service Tribunal in the year 2014 and his service appeal was disposed of in the year 2018 with direction to the Department to decide the pending appeal of the appellant. Needless to mention that the appellant absented himself without any permission of the employer for a longer time, which also tantamount to misconduct.

5. In view of the above, the instant appeal is dismissed with no orders as to costs. File be consigned to record room.

ANNOUNCED.
17.02.2021

(Attiq ur Rehman Wazir)
Member (E)
Camp Court, Abbottabad

(Rozina Rehman)
Member (J)
Camp Court, Abbottabad

19.01.2021 Due to COVID-19, the case is adjourned for the same on 17.02.2021 before D.B.

READER

17.02.2021 Appellant present through counsel present.

Noor Zaman Khan Khattak learned District Attorney for respondent present.

Arguments heard. Vide detailed judgment of today of this Tribunal placed on file, the instant appeal is dismissed. With no order as to costs. File be consigned to the record room.

Announced.
17.02.2021

(Atiq-ur-Rehman Wazir)
Member (E)
Camp Court, Abbottabad.

(Rozina Rehman)
Member (J)
Camp Court, Abbottabad.

16.11.2020 Counsel for the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Touseef, ADEO for respondents present.

The Lawyers community is not appearing in the Tribunal for the reason that they are observing sough of the Hon'able Chief Justice, Peshawar High Court, Peshawar, therefore, the case is adjourned to 19.01.2021 for arguments before D.B at camp court Abbottabad.

(Mian Muhammad)
Member(E)

(Muhammad Jamal Khan)
Member(J)
Camp Court Abbottabad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on

17 / 9 / 20 at camp court abbottabad.

Reader

17.09.2020 Appellant in person alongwith his counsel namely Malik Muhammad Ishfaq, Advocate is present. Mr. Usman Ghani, District Attorney for respondents present.

Learned counsel for the appellant submitted that he is not prepared the brief due to prevalence of Covid-19. He is seeking time. Time is allowed.

Adjourned to 16.11.2020 for arguments before D.B at Camp Court Abbottabad.

(Mian Muhammad)
Member(E)

(Muhammad Jamal)
Member
Camp Court A/Abad

18.11.2019 Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 19.12.2019 before D.B at Camp Court, Abbottabad.

Member

Member
Camp Court Abbottabad

19.12.2019 Due to general strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Ziaullah, Deputy District Attorney for the respondents present. Adjourned to 18.02.2020 for arguments before D.B at Camp Court Abbottabad.

(Hussain Shah)
Member
Camp Court Abbottabad

(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

22.05.2019 Appellant in person and Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Faheem Anwar, Assistant for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further adjournment. Adjourned to 09.07.2019 for written reply/comments before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

09.07.2019 Counsel for the appellant and Mr. Muhammad Touseef, ADO (Litigation) alongwith Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further adjournment. Last chance is granted. Adjourned to 16.09.2019 for written reply/comments before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

16.09.2019 Counsel for the appellant and Mr. Hamid Ali, Assistant alongwith Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Representative of respondents No. 1 to 3 submitted written reply which is placed on record. Case to come up for rejoinder and arguments on 18.11.2019 before D.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

18.01.2019 Appellant with counsel present. Preliminary arguments heard.

The appellant has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 02.05.2018 through which the departmental appeal of the appellant was rejected.

Points urged need consideration. The present 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.

Appellant Deposited Security & Process Fee

The respondent department is directed to furnish IBMS (Passport Travel History) of the appellant alongwith written reply/comments on 19.03.2019 before S.B at camp court Abbottabad.

Member

Camp Court A/Abad

19.03.2019 Counsel for the appellant present. Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Representative of the department is absent therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on 22.05.2019 before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of_____

Case No. 1128/**2018**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/09/2018	The appeal of Mr. Zahir Shah received today by post through Malik Ashfaq Ahmad Jillani Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR 10/9/18
2-	13-9-18	This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up there on 16-11-18. CHAIRMAN
	16.11.2018	Clerk to Counsel for the Appellant present. Due to retirement of the Hob'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 18.01.2019 at camp court Abbottabad. Reader

The appeal of Mr. Zahir Shah sn of Syed Badshah caste Syed C.T Teacher GHS Balakot Mansehra received today i.e. on 30.08.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Page nos. 10 to 13 and 19 of the appeal are illegible which may be replaced by legible/better one.

No. 1756 /S.T,

Dt. 30/8 /2018.

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Malik Ashfaq Ahmad Jillani Adv.
High Court Mansehra

Page 10 to 13 and 19 of the appeal are attached As 10 to 13 better copies and 19 bettercopy, As per order of registrar sab. 2 better copies for 2nd file and AG sab file.

07/09/2018

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No 1128 of 2018

Zahir Shah .....**Appellant**

VERSUS

Govt. of KPK through Secretary Elementary and Secondary education & others
.....**Respondent**

APPEAL

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Dated 27 /08/2018

ZAHIR SHAH
(Appellant)

Through:-

MALIK ASHFAQ AHMED JILANI
High Court District Courts
Mansehra

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Khyber Pakhtukhwa
Service Tribunal
Diary No. 1357
Dated 30/8/2018

Service appeal No 1428 of 2018

Zahir Shah son of Syed Badshah Caste Syed C.T Teacher Government High School, Balakot, resident of Garllat, Tehsil Balakot, District Mansehra.

.....**Appellant**

VERSUS

1) Govt. of KPK through Secretary Elementary and Secondary education Peshawar.

2) Director Elementary and Secondary Education, KPK Pashawar.

3) District Education officer (DEO) Mansehra.

.....**Respondents**

Filed to-day
Registrar 30/8/18

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER ENDST: NO 7494-98 DATED 02.05.2018 PASSED BY THE RESPONDENT NO 03 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED.

PRAYER:-

On acceptance of the appeal, the impugned order dated 02.05.2018 be set-aside while declaring the same as illegal, void-abnito and against the law on the subject and appellant be re-instated into service as CT Teacher with all back benefits or any other order/relief not specifically prayed may also be passed/granted in the facts and circumstances of the case.

Respectfully Sheweth:-

1. That, initially, appellant was appointed as CT Teacher at Govt. High School Boi, vide appointment order dated 13.10.1983.

   (Copy of appointment order is annexed as Annexure "A")

2. That, vide transfer order, dated, 27.08.1994, appellant was transferred and posted at govt. High School Balakot, where he assumed the charged.

   (Copy of Transfer order is annexed as Annexure "B")

3. That, in the year 1997, petitioner proceeded to Suadia-Arabia on ex Pakistan leave and returned back in

the year 2000 and started to perform his duty at Govt. High School Balakot.

(Copy of Certificate is annexed as Annexure "C")

4. That, after returning from ex-Pakistan leave, respondent No 03 was neither treating the appellant as teacher nor paying his salaries. To this effect, he filed an appeal before respondent No 01 on 28.12.2013.

(Copy of appeal is annexed as Annexure "D")

5. That, during the pendency of the aforesaid appeal respondent No 03 instated of resolving the grievance of the appellant issued him with charge sheet and statement of allegations while initiating disciplinary proceedings. Appellant filed a detailed and comprehensive reply to charge sheet, but respondents did not take the same to its logical conclusion/end.

(Copies of Charge Sheet, statement of allegations and reply are annexed as Annexure "E"& "F")

6. That, when departmental appeal of the appellant was responded to, he filed service appeal No 528/2014 before this worthy tribunal. Which was disposed of on 17.01.2018 with direction to the respondents to decide the pending appeal of the appellant and complete the pending disciplinary proceedings.

(Attested Copies of Judgment dated 17.01.2018 are annexed as Annexure "G")

7. That, incompliance with the directions of this Honourable Tribunal contained in judgment dated 17.01.2018, respondent No 03 issued a ***questionnaire*** to the appellant on 10.04.2018, which was dully responded to/ replied by the appellant.

(Copies of questionnaires and reply are annexed as annexure "H")

8. That, without adopting due course, respondent no 03 without any solid reason, straightway rejected the departmental appeal of the appellant vide impugned order dated. 02.05.2018.

(Copy of impugned order dated 02.05.2018 annexed as Annexure "I")

9. That, against the said impugned order, appellant filed an appeal before appellate authority on 19.05.2018, which has not been responded to so far.

(Copy of departmental appeal is annexed as Annexure "J")

10. That, felling aggrieved, from the impugned order dated 02.05.2018, appellant having no other remedy except to file the present appeal before this worthy tribunal for interference

inter alia on the following amongst other grounds.

GROUNDS:-

A) That, admittedly, ex-Pakistan leave was sanctioned and approved by the competent authority in conformity with the rules on the subject in the year 1997.

B) That, admittedly, appellant returned back in the year 2000 and duly submitted **arrival report** to the concerned authority/quarter and started to perform his professional duties at the posted school.

C) That, disciplinary proceeding, initiated on the basis of charge sheet dated 01.06.2015, was illegally held to which appellant submitted a detailed reply. Thereafter, it was put into cold storage.

D) That, it is interesting/pertinent to mention that so far, appellant has neither been suspended nor any major/minor penalty has been imposed upon the appellant in consequence of disciplinary action initiated on charge sheet dated 01.06.2015.

E) That, even till date, the service of the appellant is still intact and no adverse action in black and white has been taken against the appellant.

F) That, after the judgment of this honourable tribunal, dated 17.01.2018 no

inquiry was held nor due course was adopted by the respondents so, appellant has not been treated in accordance with the law on the subject which is his inalienable rights.

G) That, the impugned order dated 02.05.2018 has also been passed without affording an opportunity to the appellant, so, it is illegal and void-abinito and liable to be set at naught.

PRAYER:-

On acceptance of the appeal, the impugned order dated 02.05.2018 be set-aside while declaring the same as illegal, void-abnito and against the law on the subject and appellant be re-instated in to service as CT Teacher with all back benefits or any other order/relief not specifically prayed may also be passed/granted in the facts and circumstances of the case.

Dated 27 / 08/2018

ZAHIR SHAH
(Appellant)

Through:-

MALIK ASHFAQ AHMED JILANI
High Court District Courts
Mansehra

VERIFICATION :

I, Zahir Shah son of Syed Badshah Caste Syed C.T Teacher Government High School, Balakot, resident of Garllat, Tehsil Balakot, District Mansehra do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

ZAHIR SHAH

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No _____of 2018

Zahir Shah .....**Appellant**

VERSUS

Govt. of KPK through Secretary Elementary and Secondary education & others
.....**Respondent**

APPEAL

AFFIDAVIT

I, ZAHIR SHAH SON OF SYED BADSHAH CASTE SYED C.T TEACHER GOVERNMENT HIGH SCHOOL, BALAKOT, RESIDENT OF GARLLAT, TEHSIL BALAKOT, DISTRICT MANSEHRA DO HERBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT THE NO SUCH SUBJECT MATTER APPEAL HAS EVER BEEN FILED BEFORE THIS HONORABLE COURT NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Dated: 27 /08/**2018**

ZAHIR SHAH
DEPONENT

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

Service appeal No _____of 2018

Zahir Shah .....**Appellant**

VERSUS

Govt. of KPK through Secretary Elementary and Secondary education & others

.....**Respondent**

APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT:

Zahir Shah son of Syed Badshah Caste Syed C.T Teacher Government High School, Balakot, resident of Garllat, Tehsil Balakot, District Mansehra.

RESPONDENTS:

1). Govt. of KPK through Secretary Elementary and Secondary education Peshawar.

2). Director Elementary and Secondary Education, KPK Pashawar.

3). District Education officer (DEO) Mansehra.

Dated 27 /08/2018

ZAHIR SHAH
(Appellant)

Through:-

MALIK ASHFAQ AHMED JILANI
High Court District Courts
Mansehra

Attested

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Annex "A"

OFFICE OF THE DIRECTOR OF EDUCATION(SCHOOLS)HAZARA DIVISION ABBOTTABAD

OFFICE ORDER NO. 94 /CT(

DT:A.ABAD,THE 13.10 /83.

APPOINTMENTS/TRANSFERS/ADJUSTMENTS:

The following appointments/transfers/adjustments of CTs/S (Male)are hereby ordered in the interest of public service with immedi effect:-

S.N	Name	From	To	Remarks
1.	Arif Hussain Shah,BSc Cadt: s/o Mehdi Hussain Shah Vill:Rajan P.O.Tarnawai.ATD.		GHS [illegible]	Agst:N/Created CT post.
2.	Zahir [illegible] Shah Cdt: Vill:Garlat Balakot Mansehra.		GHS [illegible]	[illegible]e Abdur Qad CT promoted to SET post.
3.	Ali Akbar,s/o Molvi [illegible]roz, Vill:Battagram Mansehra.	"	[illegible]	[illegible]ce Mohd Ayub promoted to SE post.
4.	Muns[illegible] s/o Rehmatullah Khan Vill:Piswal Mian,P.O., Public School,ATD.	"	GHS Nagri Tutial.	Agst:vacant CT post.
5.	Rafiulla[illegible] Vill:Rajdhani Battamohri Mansehra	"	GMS Dilbori	----do----
6.	Khalid [illegible] Vill:Saradna Haripur.	"	GMS Kotla	---do-----
7.	Sardar Ali s/o Mohd Khan [illegible]agram Mansehra.	"	GMS Kanai	Vice Saeed Akl CT alrdy:Trfd
8.	Mohammad Nawaz,s/o Mohd Aslam V&PO Tannan,A.Abad.	"	GHS Lora	[illegible] SV alrdy:Trfd
	Ihsanullah s/o Qazi Sibghatullah V&PO Shergarh Mansehra.		GMS Kolika	Agst:vacant S post.
10.	Mohammad Daud s/o Mohd Yousuf [illegible],Sadar Bazar A.Abad.	"	GHS Namli Maira	---do----
11.	Fazal Dad s/o Umar Din V&PO [illegible]	"	GHS Store	Agst:vacant C post.
12.	Abdul Sali[illegible] Roshan Din Vill:Derwesh Pangwwarian Wala Haripur.(Ex-Serviceman L/Naik)	"	GMS Derwesh	Agst:N/Created post.
13.	Qazi Jamilur Rehman,FSc s/o Q.Habibur Rehman V&PO Shergarh Mans[illegible]	"	GHS Gidderpur	Agst:vacant SV post(To provide Science Teacher
14.	Ayyaz Hussain,FSc s/o Habibur Rehman Moh:Aurangzaad Chitti Dheri	"	GHS Ghazi	Vice Sher Azar CT died.
15.	Mohammad Ayyaz,FSc s/o [illegible] Khan Vill:Gulmaira G.H.U[illegible] Mansehra.	"	GMS Hadora Bandi.	Agst:vacant S[illegible]
16.	Mohammad T[illegible] s/o Khushal Khan Vill:Juna [illegible],ATD.(Teacher Son)		GHS Kuthiala	Agst:vacant SV post(To provide Science Teache
17.	Shah Zaman,FSc s/o Mir Alam Vill: Dader Mansehra.	"	GMS Chamhad	Agst:vacant SV post.
18.	Tahir Saeed Siddiqui,FSc s/o Mohd Saeed Siddiqui Vill: Harhalla Dadar Sanitoriom.	"	GMS Kanthiali	------do-----

Contd:page-2-

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19.	Mohammad Javed s/o Abdul Latif c/o Khurshid Hotel G.H.Ullah Mansehra.	Cdt:	GMS Kothera	Agst:vacant SV post.
20.	Alam Zeb s/o Abdul Sattar Behali Mansehra.	"	GHS Khanspur	---do---
21.	Shabir Ahmad s/o [illegible]zaman V&PO Sherwar [illegible].	"	GHS Gadda	Agst:N/Created CT post.
22.	Shahzada s/o Anwar Khan V&PO Mongon Mansehra	"	GMS Galgali	Agst:N/Created SV post.
23.	Shaheen Iqbal s/o Mohd Yousuf Khan Shopkeeper Gali Bazar [illegible]	"	GHS Ghazi	Agst:vacant SV post.
24.	Mubarak Zeb s/o Aurangzeb Swatti Vill:Faqirabad PO Battar Kot Mansehra.		GMS [illegible]	----do------
25.	Mohammad Sadiq [illegible] Via Rehana [illegible] Naib Subed[illegible]	"	GMS Gandhian Haripur.	----do-----
26.	Saeedur Rehman s/o Gohar Rehman Moh:Noshad Dhodial Mansehra.(Teacher Son).	"	[illegible]	Agst:N/Created CT post.
27.	Mohammad Salim s/o Fida Mohd V&PO Jarral [illegible]	"	[illegible]	Agst:vacant SV post.
28.	Haroonur Rashid s/o Abdul Wahab V&PO Sherpur Mansehra		GMS Tori Sharif	Vice Sr:No.42
29.	Safdar Hussain [illegible] Shah c/o W Vanity Shoe Link Road ATD. (Ex-Serviceman Son)		[illegible]pur Dheri	Vice Sr:No.35
30.	Mohammad Farooq s/o Molvi Rahimullah c/o Suba Khan Shopkeeper Gali Bazar Balakot Mansehra.		GMS [illegible]	post.

XXX EX-SERVICEMAN QUOTA.

31.	Umar Said s/o Abdullah Shah Vill:Kund Bashem Tehsil Bagrar Mansehra.(Ex-KDS Serviceman)	Cdt:	GMS Kund	Agst:N/Created SV post.

XXX EDUCATION EMPLOYEES SON QUOTA.

32.	Mushtaq Ahmad s/o Mohammad Aslam V&PO Labarkot Mansehra(Tech:Son)	"	GMS Labarkot	Agst:vacant SV post.
33.	Zulfiqar Ahmad s/o Abdul Ghafoor V Sajikot Qalandar Abad(Class-IV Son)	"	GMS Gadda	Agst:N/Created SV post.
34.	Farid Shah s/o [illegible] Mohd Ghous HM GHS Dh[illegible] [illegible]ner Son).	"	GHS [illegible]	Vice Sr:No.37

XXX TRANSFERS

35.	Mohammad Sohail CT	GHS Baghpur Dheri.	GMS Choi	Vice Sr:No.36.
36.	Abdul Saghir CT	GMS Choi	GHS Najirpur	Agst: Vacant post.
37.	Khalid Mehmood Khan,CT	GHS Tarnawai	GHS Mirpur	Vice Mohd Shoaib not joined
38.	Aftab Ahmad,CT	GMS Sangar	GMS Labarkot	Agst:N/Created CT post.
39.	Saeed Ahmad,CT	GMS Basian	GMS Sangar	Vice Sr:No.38.
40.	Mian Shahzad Gul,CT 1978,working on [illegible] post	GHS Kund	GMS Kund	Agst:N/Created CT post.in B.S.No 9.
41.	Mumtaz Khan,CT,GMS Karsela Under transfer to GHS Kahal		GMS Derwesh	Agst:N/Created CT post we.from 11-10-83 the date of arrival at GHS Kahal.

Attested
Gaffar

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42.	Mohammad Yaqoob, CT	GMS Tori Sharif	GHS Pattan Khurd	Agst: vacant CT post.
43.	Khaliquz Zaman, CT, GHS Berote.	On return from Long Leave.	GMS Bassian	Vice Sr: No.3
44.	Said Akbar Shah s/o Mohammad Shah Cdt Vill: & PO Bilandkot Battagram Mansehra. (B.A).		GMS Sakhargah Battagram.	Agst: vacant SV post.

Notes:-

1. Charge reports should be sent [illegible] all concerned in duplicate.
[illegible] to [illegible].
3. All untrained candidates will get initial scale of CT/SV i.e. 620-p.m. fixed and 590/-p.m. fixed [illegible] respectively.
4. All the newly appointee candidates are required to produce their age and Health Certificate from the [illegible] and no pay etc shall be drawn unless and untill they produce [illegible] certificate from the said officer.
5. Educational Professional qualfications of cadts: should be checked [illegible] handing over charge to them.
[illegible] of candidates shall automatically stand [illegible] if they failed to join the post within 15 days of the issue of this order.
[illegible] the charge of post [illegible] exceed 30 years [illegible] service man 10 years service [illegible] allowed. Provided they have served in X [illegible] on they [illegible] have to give one month [illegible] in lieu of notice.
X Defence [illegible] atleast 10 years.
9. The appointments of candidates are puerly on temporary basis and liable to termination without notice or reason.

(MOHAMMAD RAFIQ KHAN JADOON)
DIRECTOR OF EDUCATION(S),
HAZARA DIVN: ABBOTTABAD.

Endst. No. 21516-97/AE.III CT/SV Dated A/Abad the 13.10.[illegible]/1983.

Copy to :-

1. The Director of Education (S). N.W.F.P. Peshawar.
2-4 The DEO(M) Abbottabad, Mansehra and Kohistan.
5-8. The S.D.E.O.(M) Abbottabad, Mansehra, Haripur and Battgram.
9-25 The Headm[illegible] [illegible]hawai, Boi, Battagram, Nagri Totial, Lora, Namli maira, Sator[illegible], Giddarpur, Ghazi, Kuthiala, Kanthiali, Khanaspur Gadda, Baghpur Dheri, Najafpur, Mirpur, PattanKhurd.
26-44 The Headmaster [illegible] Dilbori, Kotla [illegible] Kolika, Darwesh, Hadora Bandi, [illegible], Kotera, Jalgal[illegible], Bassian, Gh[illegible] Haripur, Jarrak Tori Shareef, Kiala, [illegible] Choi, [illegible] [illegible]rGah.
45-79 All candidates concerned.
80 The ADE Local Directorate.
81 V AE.
82. Office order File.

DIRECTOR OF EDUCATION(S),
HAZARA DIVN: ABBOTTABAD.

THE HEAD MASTER
GOVT. HIGH SCHOOL

Attested

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BETTER COPY

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) HAZARA DIVISION ABBOTTABAD

Annx A

Office Order No. 94/CT(M)

DT:A.ABAD, THE_____/83.

APPOINTMENTS/TRANSFERS/ADJUSTMENTS:

The following appointments/transfers/adjustments of CTs/SVs (Male) are hereby ordered in the interest of public service with immediate effect:-

S. NO	NAME & ADDRESS	FROM	TO	REMARKS
1.	Arif Hussain Shah, BSc S/O Mehdi Hussain Shah Vill: Rajan PO Tarnawai ATD.	Cadt	GHS Tarnawai	
2.	Zahir Shah, FSc S/O S. Bad Shah Vill: Garlat alakot Mansehra	Cadt	GHS Boi	Vice Abdur Qadir CT Promoted to SET post.
3.	Ali Akbar, S/O Molvi Feroz, Vill: Battagram Mansehra	Cadt	'GHS Battagram	Vice Mohd Ayub, CT Promoted to SET Post
4.	Munsif Khan S/O Rehmatullah Khan Vill: Piswal Mian, PO Public School. ATD	Cadt	GHS Nagri Tutial	Agst: Vacant CT Post
5.	Rafiullah S/O Mukhtiar Nabi Vill: Rajdhani Battamohri Mansehra	Cadt	GMS Dilbori	------do------
6.	Khalid Zaman S/O Khan Mohd Vill: Saradna Haripur	Cadt	GMS Kotla	------do------
7.	Sardar Ali S/O Mohd Khan Vill: & PO Battagram Mansehra	Cadt	GMS Kanai	Viace Saeed Akhter CT Alrd: Trfd:
8.	Mohammad Nawaz S/O Mohd Aslam V&PO Tanan, A. Abad	Cadt	GHS Lora	Vice SV Alrdy: Trfd:
9.	Ihsanullah S/O Qazi Sibghatullah V&PO Shergarh Mansehra	Cadt	GMS Kolika	Agst: Vacant SV post
10.	MOhammd Daud S/O Mohd Yousuf C/O haroon Gen: Store, Sadar Bazar A. Abad	Cadt	GHS Namli Maira	----do-----
11.	Fazal Dad S/O Umar Din V&PO Jhangra, ATD	Cadt	GHS Store	Agst: Vacant CT post
12.	Abdul Salim S/O Roshan Din Vill :Derwesh Pangwarian Wala Haripur. (Ex-Serviceman L/Naik)	Cadt	GMS Derwesh	Agst: N/Created SV Post.
13.	Qazi Jamilur Rehman, FSc S/O Q. Habib ur Rehman, V&PO Shergarh Mansehra.	Cadt	GHS Gidderpur	Agst: Vacant SV Post (To provide Science Teacher).
14.	Ayyaz Hussain, FSc S/O Habib ur Rehman Moh: Aurangabad Chitti Dheri Mansehra	Cadt	GHS Ghazi	Vice Sher Azam CT diod.
15.	Mohammad Ayyaz, FSc S/O Mohd Khan Vill: Gulamaira G.h.Ullah Mansehra	Cadt	GMS Hadora Bandi	Agst: Vacant SV Post
16.	Mohammd Tariq, FSc S/O Khushal Khan Vill: Juna Chamhatti, ATD. (Teacher Son)	Cadt	GHS Kuthiala	Agst: Vacant SV post (To provide Science Teacher).
17.	Shah Zaman, FSc S/O Mir Alam Vill: Dadar Mansehra	Cadt	GMS Chamhad	Agst: Vancant SV Post
18.	Tahir Saeed Siddiqui, FSc S/O Mohd Saeed Siddqieui Vill: harhalla Dadar Sanitoriom.	Cadt	GMS Kanthiali	-----do-----
19.	Mohammad Javed S/O Abdul Latif C/O Khurshid Hotel G.H.Ullah Mansehra	Cadt	GMs Kothera	Agst: Vacant SV Post
20.	Alam Zeb S/O Abdul Sattar Behali Mansehra	Cadt	GHS Khanspur	----do----
21.	Shabir Ahmad S/O Khanizaman V&Po Sherwan A. Abad		GHS Gadda	Agst: N/Created

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22.	Shahzada S/O Anwar Khan V&PO Mongon Mansehra		GMS Galgali	Agst: N/Created SV Post
23.	Shaheen Iqbal S/O Mohd Yousuf Khan Shopkeeper Gali Bazar		GHS Ghazi	Agst: Vacant SV Post
24.	Mubarak Zeb S/O Aurangzeb Swatti Vill: Faqirabad PO Battar Kot Mansehra		GMS Bassian	----do----
25.	Mohammad Sadiq V&PO Gandhian Via Rehana Haripur. (Ex. Serviceman naib Subedar).		GMS Gandhian Haripur	----do----
26.	Saeed ur Rehman S/O Gohar Rehman Moh: BNoshad Dhodial Mansehra (Teacher Son).		GMS Galgali	Agst: N/Created CT Post
27.	Mohammad Salim S/O Fida mohd V&PO jarral a.Abad		GMS Jarral	Agst: Vacant SV Post
28.	Harroon ur Rashid S/O Abdul Wahab V&PO Sherpur Mansehra		GMS Tori Sharif	Vice Sr. No 42
29.	Safdar Hussain S/O Abdul Wahab C/O Vanity Shoe Link Road ATD (Ex-Serviceman Spey)		GMS Baghpur Dehri	Vice Sr. No.35
30.	Mohammad Farooq S/O Molvi Rahimullah C/O Suba Khan Shopkeeper Garlat Bazar Balakot Mansehra		GMS Klala	
EX-SERVICE MAN QUOTS.				
31.	Umar Said S/O Abdullah Shah Vill: Kund Basham Battagram Mansehra (Ex-KDB Serviceman)		GMS Kund	Agst: N/Created SV Post.
EDUCATION EMPLOYEES SON QUOTA.				
32.	Mushtaq Ahmad S/O Mohammad Aslam V&PO Labarkot Mansehra (Teach: Son)		GMS Labarkot	Agst: Vacant SV Post
33.	Zulfiqar Ahmad S/O Abdul Ghafoor V Sajikot Qalandarabad (Class IV Son)		GMS Gadda	Agst: N/Created SV Post.
34.	Farid Shah S/O Shah Mohd Ghoud HM GHS Data (Teacher Son)		GHS Tarnawai	Vice Sr: No. 37
TRANSFERS.				
35.	Mohammd Sohrab CT	GHD Baghpur Dehri	GMS Chori	Vice Sr. No. 36
36.	Abdul Saghir CT	GMS Choi	GHS Najirfpur	Agst: Vacant Post.
37.	Khalid Mehmood, FA, CT	GHS Tarnawai	GHS Mirpur	Vice Mohd Shaib not joined
38.	Aftab Ahmad, CT	GMS Sangar	GMS Labarkot	Agst: N/Created CT post.
39.	Saeed Ahmad, CT	GMS Basian	GMS Sangar	Vice Sr. No. 38
40.	Mian Shahzad Gul, Ct 1978. Working on JV post	GHS Kund	GMS Kund	Agst: N/Created CT post in B.S. No 9
41.	Mumtaz Khan, CT, GMS Nareela Under Transfer to GHS Kahal		GMS Derwesh	Agst: N/Created CT Post we form 11-10-83 the date of arrival at GHS Kahal.
42.	Mohammad Yaqoob Ct	GMS Tori Sharif	GHS Pattan Khurd	Agst: Vacant CT Post
43.	Khaliquz Zaman, Ct, GHS berkte	Onreturn from Long Leave.	GMS Bassian	Vice Sr: No. 39
44.	Said Akbar Shah S/O Mohammad Shah Vill: & PO Bilandkot Battagram Mansehra (B.A)	Cadt	GMS Sakhargah Battagram	Agst: Vacant SV Post.

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Annx A

NOTES:

1. Charge reports should be sent to all concerned in duplicate.
2. No TA/DA or TG is allowed to anyone.
3. All untrained candidates will get retail scale of CT/SV i.e 620-p.m fixed and 590/- p.m fixed respectively.
4. Al the newly appointee candidates are required to produce their age and Health Certificate from the Medical Supdt: and no pay etc Shall be drawn unless and until they produce the above certificate form the said officer.
5. Educational/professional qualifications of cadts: should be checked before handing over charge to them.
6. The appointment of candidates shall automatically stand concerned it they failed to join the post within 15 days of the issue of this order.
7. The candidates should not be given the charge of post in case their age below 18 years or exceed 30 years X Defense Forces however in the cases of Ex-service man 10 years service at least 10 years. Concession is allowed-Provided they has served in X.
8. In case of resignation they should have to give one month prior notice or forfeit one month pay in lieu of notice.
9. The appointments of candidates are purely on temporary basis and liable to termination without notice or reason.

MUHAMMAD RAFIQ KHAN JADOON
DIRECTOR OF EDUCATION (S)
HAZARA DIVN: ABBOTTABAD

Endst: No.21516-97/AE.III CT/SV

Dated: A/Abad the 13-10-1983

COPY TO:-

1. The Director of Education (S), N.W.F.P Peshawar

2-4 The D.E.O (M) Abbottabad, Mansehra and Kohistan.

5-8 The S.D.E.O (M) Abbottabad, Mansehra, Haripur and Battagram.

9-25 The Headmasters, GHS Tarnawai, Boi, Battagram, Nagri Totial, Lora, Namli Maira, Satora, Gidderpur, Ghazi, Kuthiala, Kanthiali, Khanaspur, Gadda, Baghpur Dheri, Najafpur, Mirpur, Pattankhurd.

26-44 The Headmaster GMs, Dilbori, Kotla, Kanai, Kolika, Darwesh, Hadora Bandi, chamhad, Kotera, Jalgali, Basian, Ghandian Haripur, Jarrat, Tori Shareef, Kiala, Kund, Labarkote, Choi, Sangar & Sakargah.

45-79 All candidates concerned.

80 The ADE Local Directorate.

81 VAE

82 Office order File

DIRECTOR OF EDUCATION (S)
HAZARA DIVN: ABBOTTABAD

[illegible]

[illegible]

[illegible]

Attested

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Anx = 'B'

OFFICE OF THE DIRECTOR OF EDU:(SCHOOLS) [illegible] DIVISION ABBOTTABAD.

OFFICE O.B.E.O. [illegible]/CT

PRA SEERS/ADJUSTMENTS:

The following transfer & adjustments of CT(Male)are hereby ordered in the interest of public service with immediate effects:-

Sr:No.	Name	From	To	Remarks
1.	Khalid Zaman,CT	GHS Kotla	GHS Najjifpur	Agst:vacant CT po
2.	[redacted]	[redacted]	[redacted]	[redacted]
3.	[illegible] Gaudar,CT	GHS Gijbori	GHS Tailoos	Vice Sr:No.4.
4.	[illegible] ed,CT	GHS Tailoos	GHS Gijbori	Vice Sr:No.3.abov
5.	Tanveer Hussain Shah SV.(Untrained)	GHS Tarhat	GHS Tarhat	Agst:vacant CT po @ Rs:620/-PM(Fixed)
6.	Mohammad Yous [illegible] (UTD.)	[illegible]	[illegible]	Vice Sr:No.8.
7.	Matiullah,CT	GHS [illegible] Kot and GHS Sarri		Vice Jamil(Utd:) [illegible] designed for so vi
8.	Gulzar Ahmad,CT	GHS Kotgali	GHS Khait Sarash.	Agst:vacant CT po
9.	Hanzoor Elahi,CT	GHS Garam Thun.	GHS Chhoi	Agst:N/Created CT post.
10.	Mohammad Tahir,CT	GHS Hadora	GHS Balakot	Agst:vacant CT po

Notes:- Charge reports should be submitted to the concerned. TA/DA & TG is allowed to [illegible] one.

(Mohammad Rafiq Khan Jadoon)
Director of Education (S),
Hazara Division Abbottabad.

Endst No. [illegible] Adjustment/Trf:/CT/SV(M) Dt: A.Abad, the [illegible]

Copy forwarded for information to the:-

1-2. [illegible] Education Officers [illegible]
3-6. [illegible] B.E.E.O.(M), Abbottabad, [illegible] & Mansehra.
7-12. [illegible] Headmaster GHS Najafpur, Balak[illegible], Tailoos, Chhoi, Kangra [illegible] and Sarri
13-16 The Headmaster GHS Kotl[illegible] [illegible] Tank, Khait Sarash. [illegible]
17. V- AE Local Direct[illegible]
18. O.O.File.
19. A.D.E. Local Directorate

PDW/ DIRECTOR OF EDUCATION (S),
HAZARA DIV: ABBOTTABAD.
[illegible]

Attested

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Annx-B

BETTER COPY

OFFICE OF THE DIRECTOR OF EDU: (SCHOOLS) HAZARA DIVISION ABBOTTABAD

Office Order No. 170/CT(M)

TRANSFERS/ADJUSTMENTS:

The following transfers/adjustments of CT (Male) are hereby ordered in the interest of public service with immediate effect:-

S. NO	NAME & ADDRESS	FROM	TO	REMARKS
1.	Khalid Zaman, CT	GMS Kotla	GHS Najifpur	Agst: Vacant CT post
2.	Zahir Shah, CT	GHS Boi	GHS Balakot	----do----
3.	Sultan Sikandar, Ct	GMS Gijbori	GHS Tailoos	Vice Sr: No. 4
4.	Mohamma Saeed, Ct	GHS Tailoos	GMS Gijbori	Vice Sr: No. 3 Above
5.	Tanveer Hussain Shah	GMS Tarhat	GMS Tarhat	Agst: Vacant CT post Rs: 620/- PM (Fixed)
6.	Mohammad Yousuf, CT (UTd:)	GHS Kangra	GHS Kotgali	Vice Sr: No. 8
7.	Matiullah CT	GMS Salam Khund	GHS Sarri	Vice Jamil (Utd) CT Resigned for service
8.	Gulzar Ahmad, CT	GHS Kotgali	GMS Khait Sarash	Agst: Vacant CT Post
9.	Manzoor Elahi, CT	GMS Garam Thun	GHS Chhoi	Agst: N/Created CT Post
10	Mohammad Ishfaq CT	GMS Hadora	GHS Balakot	Agst: Vacant CT Post

Notes: Charge reports should be submitted to all concerned. No TA/DA & TG is allowed to any one.

MUHAMMAD RAFIQ KHAN JADOON
DIRECTOR OF EDUCATION (S)
HAZARA DIVN: ABBOTTABAD

Endst: No.17515-34/Appointment/Trf:/CT/SV (M) Dt: A. Abad, the _____

COPY FORWARDED FOR INFORMATION TO THE:-

1-2 Distt: Education Officers (Male) A. Abad & Mansehra.

3-6 The S.D.E.O (M), Abbottabad, Haripur, Battagram, Mansehra.

7-12 The headmaster GHS Rajafpur, Balakot, Tailoos, Chooi, Kangra Coloney and Sarri.

13-16 The Headmaster GMS Kotla Gijbori, Tarhat, Khait, Sarash

17 V-AE Local Directorate

18 O.O File

19 A.D.E Local Directorates.

DIRECTOR OF EDUCATION (S)
HAZARA DIVN: ABBOTTABAD

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Annex (C)

To,
The DEO (M),
Mansehra

Subject. CONFIRMATION AND ATTESTATION

This is hereby strongly confirmed, affirmed, attested and certified that Mr Zahir shah S/O Syed Bad shah CNIC NO: 13501-2379999-3 had been serving this school as C.T Teacher from 1984 (as per transfer order No:170/CT(M) endorsement No.17515-34 Dated.27-08-1984)

In the earthquake of 2005,a lot of school record has been destroyed (The details has already been supplied by the previous incharge principals, during the case proceedings of Mr.Zahir shah)

Furthermore Mr Zahir shah is a hard working teacher and his ex-students are still teaching in this school.

PRINCIPAL
G.H.S Balakot 2/5/2018
PRINCIPAL
Govt High School
Balakot Mansehra

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بخدمت جناب سیکرٹری صاحب محکمہ ایجوکیشن پشاور

Awan (D)

محکمانہ اپیل

جناب عالی! موجبات اپیل ذیل عرض ہے۔

۱۔ یہ کہ من اپیلانٹ نے بذریعہ انڈورسمنٹ نمبری 21516/97/AE/III/CT/SV مورخہ 13.10.1983 کو گورنمنٹ ہائی سکول بوئی میں بطور C.T. ٹیچر تعینات ہوا اور باقاعدگی سے اپنی ڈیوٹی سرانجام دیتا رہا۔ بعدازاں آفس آرڈر انڈورسمنٹ نمبر 17515-34/Adjustment/Trf:/CT/SV(M) مورخہ 27.08.1994 کو گورنمنٹ ہائی سکول بوئی سے ٹرانسفر ہو کر گورنمنٹ ہائی سکول بالاکوٹ میں چارج لیا۔ → 1984 (correction)

۲۔ یہ کہ سال 1997ء میں اپیلانٹ Ex-Pakistan leave پر Without pay سعودی عرب روانہ ہو گیا اور سال 2000ء میں واپس آنے پر اپیلانٹ نے اپنی حاضری گورنمنٹ ہائی سکول بالاکوٹ میں کی۔

۳۔ یہ کہ اس وقت سے لے کر آج تک من سائل کو تنخواہ کی ادائیگی نہیں ہوئی اور من سائل کی سروس بک بھی ضائع کر دی گئی ہے۔ کئی مرتبہ حکام بالا کو اس نسبت درخواستیں دی گئیں لیکن کوئی عمل درآمد نہ ہوا۔

لہٰذا آپ سے دست بستہ اپیل ہے کہ اپیلانٹ کی اپیل پر غور فرماتے ہوئے من اپیلانٹ کو اس تمام عرصہ کی تنخواہ معہ جملہ واجبات ادائیگی کا حکم صادر فرمایا جائے۔ بصورت دیگر من اپیلانٹ سروس ٹریبونل میں اپیل کا حق محفوظ رکھتا ہے۔

المرقوم 28.12.2013

ATTESTED Muhammad Khan (Advocate) District Mansehra

ظاہر شاہ ولد سید بادشاہ C.T. گورنمنٹ ہائی سکول بالاکوٹ، گاؤں گرلاٹ بالاکوٹ ---------- اپیلانٹ

Attested

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Annex E

CHARGE SHEET

I, Abdullah, District Education Officer (M) E & S E Deptt Mansehra as Competent Authority, hereby charge you, M/S,

1. Zahir Shah Ex.CT Government High School Balakot Manshra as follows:-

That you while posted as Ex. CT GHS Balakot committed the following irregularities:-

(i) Misconduct (ii) Corruption (Inefficiency) not performed your official duty and you were remained absent for the last 25 years, and there is no any proper record of your service at your schools.

(ii). You have committed breach of aforesaid rules being a government servant within the Meaning of Section 15 of Khyber Pakhtunkhwa Civil Servants Act, 1973.

2. By reason of the above, you appear to be guilty of misconduct under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered your self liable to all or any of the penalties specified in Rule-4 of the Rules ibid.

3. You are, therefore required to submit your written defense within seven days of the receipt of this Charge Sheet to the inquiry officer/inquiry committee, as the case may be.

4. Your written defense, if any, should reach the inquiry officer/inquiry committee within specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-part action shall be taken against you.

5. Intimate whether you desire to be heard in person.

6. A statement of Allegations is enclosed.

(ABDULLAH)
District Education Officer (Male)
Mansehra (COMPETENTAUTHORITY)

Endst No. 7850 -53 Dated 01/6 2015

Copy is forwarded to the :

1. The Director E&SE Khyber Pakhtunkhwa Peshawar
2. Assistant Registrar Right to information Commission 7th Floor Near Benola Fund Building 6th Sector Road Peshawar
3. Mr Zahir Shah Ex. CT Teacher GHS Balakot Mansehra
4. The Principal G HS Balakot Mansehra

District Education Officer (Male)
Mansehra (COMPETENTAUTHORITY)

Attested

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Annex E

DISCIPLINARY ACTON

I, Abdullah, District Education Officer (M) E & S E Deptt Mansehra as Competent Authority, hereby charge you, M/S,

Zahir Shah Ex.CT Government High School Balakot Manshra as follows:-

have rendered himself liable to be proceeded against, as they committed the following Acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011

STATEMENT OF ALLEGATIONS

i. By reason of the above, you appear to be guilty of misconduct, corruption and inefficiency under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered not performed your official duty and you were remained absent for the last 25 years, and there is not proper record of your service at your schools.

ii. They have committed breach of aforesaid rules being a government servant within the meaning of Section 15 of Khyber Pakhtunkhwa Civil Servants Act, 1973.

2. For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer/inquiry committee, consisting of the following is constituted under Rule 10(1) (a) of the ibid Rules:

i. Mr Fayyaz Ahmed HM GHS Trangri Bala (B-17) Mansehra – Chairman
ii. Mr Mohammad Miskeen GHS Chansair (B-17) Mansehra - Member

3. The inquiry officer/inquiry committee shall, in accordance with the provisions of the ibid Rules, provide reasonable opportunity of hearing to the accused, record its findings and make within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer/inquiry committee.

(ABDULLAH)
District Education Officer (Male)
Mansehra (COMPETENTAUTHORITY)

Endst No. 7854 – 57 Dated 01 / 6 2015

Copy is forwarded to the :

1 The Director E&SE Khyber Pakhtunkhwa Peshawar
2 Assistant Registrar Right to information Commission 7th Floor Near Benola Fund Building 6th Sector Road Peshawar
3 Mr Zahir Shah Ex. CT Teacher GHS Balakot Mansehra
4 The Principal GHS Balakot Mansehra

District Education Officer (Male)
Mansehra (COMPETENTAUTHORITY)

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Attested

تحریری دفاعی جواب بحوالہ چارج شیٹ انڈورسمنٹ نمبر 53-7850 مورخہ 01-06-2015 منجانب EO(M)

رجسٹری وصول شدہ بتاریخ 4-06-2015

جناب عالی!

میں مسمی ظاہر شاہ ولد سید بادشاہ EX-CT ہائی سکول بالاکوٹ کے نام بھیجی گئی چارج شیٹ کے مندرجہ ذیل جوابات انتہائی ادب کے ساتھ پیش خدمت کرتا ہوں۔

1. **Misconduct** میں قطعی طور پر اسکا مرتکب نہیں ہوا۔

ا۔ میں نے ہمیشہ اپنے فرائض منصبی کو اپنی تمام تر اعلیٰ صلاحیتوں کے ساتھ بروئے کار لاتے ہوئے بطریق احسن انجام دیا ہے۔ ذاتی وجوہ کی بنیاد پہ بعدازاں 3 سال چھٹی بغیر تنخواہ کے محکمہ کی باقاعدہ منظوری سے حاصل کی۔

۲۔ اپنی چھٹی کے اختتام پر میں نے محکمہ سے ایڈجسٹمنٹ کے لئے رجوع کیا اور ایڈجسٹمنٹ کے لئے تا حال دربدر کی ٹھوکریں کھانے پر مجبور ہوں لیکن مجھ سے ٹال مٹول ہی کیا جاتا رہا۔ اور دوبارہ مجھے اس عظیم خدمت کا موقع ہی نہیں دیا گیا۔

2. **Corruption**

ا۔ اس الزام سے نہ صرف میں بلکہ ہر سننے والا ذی شعور شخص ماسوائے حیرت کے کچھ اور نہیں کہہ سکتا۔

۲۔ میری چھٹی بغیر تنخواہ کے تھی۔

۳۔ مجھے محکمے کا کچھ نہیں دینا بلکہ میرے واجبات (GP Fund) وغیرہ محکمے کی طرف بقایا ہیں۔

۴۔ اپنی چھٹی کے اختتام پہ اپنی ایڈجسٹمنٹ کے لئے آج تک بھاگتے دوڑتے میں اپنے احباب کا مقروض ہو چکا ہوں۔ اور نوبت فاقوں تک پہنچ گئی ہے۔

۵۔ Teaching میرے ایمان کا حصہ ہے اور اس کار عظیم کو انجام دینے کے لئے میں اپنی ہر ممکن سعی کرتا رہوں گا۔

3. **Absent from 25 Years**

ا۔ اپنی قانونی چھٹی کے اختتام پر میں نے محکمہ کو درخواست برائے حاضری وایڈجسٹمنٹ دی اور باقاعدہ گورنمنٹ ہائی سکول بالاکوٹ (جہاں سے چھٹی پر گیا تھا) Arrival دی لیکن پوسٹ خالی نہ ہونے کا کہا گیا جس کے لئے آج تک بھاگ رہا ہوں لیکن کوئی شنوائی نہیں ہوئی۔

۲۔ اسی دوران 2005 کا ہولناک زلزلہ آ گیا اور گورنمنٹ ہائی سکول بالاکوٹ کی انتظامیہ کے مطابق میری سروس بک اور ریکارڈ ضائع ہو گیا۔ 2005 کے ہولناک زلزلے میں مجھے شدید مالی اور جانی نقصان اٹھانہ پڑا جس سے میں ذہنی طور پر ابھی تک ڈسٹرب ہوں۔

4. **Proper Record of Service unavailable**

ا۔ میرے سروس ریکارڈ کا محافظ متعلقہ سکول اور محکمہ تعلیم تھا۔

۲۔ میرے متعدد بار کے مطالبے پر اس وقت کے پرنسپل جناب محمد عارف خان نے آفیشل لیٹر بنا کر دیا جس میں اس حقیقت کو تسلیم کیا گیا کہ آپ کا ریکارڈ دوران زلزلہ سکول سے گم ہو چکا ہے۔ اور DEO صاحب سے درخواست کی گئی کہ متعلقہ ٹیچر کو نئی سروس بک بنا کر دی جائے جس پر تا حال عمل درآمد نہیں ہوا (لیٹر کی کاپی ہمراہ ہے)

۳۔ میں اپنے گھریلوں پریشانیوں اور انتہائی غربت کے باعث چھٹی پر گیا (بغیر تنخواہ کے چھٹی) بعدازاں چھٹی کی درخواستیں اپنے متعلقہ ہیڈ ماسٹر صاحبان کو ارسال کرتا رہا۔

۴۔ انتہائی ادب اور عاجزی کے ساتھ گزارش کرتا ہوں کہ کیا محکمہ تمام رولز مجھ پر ہی لاگو کرنا چاہتا ہے اور خود ہر قانون سے بچنا چاہتا ہے جبکہ اس سے بڑی محکمانہ غفلت اور کیا سکتی ہے کہ مجھے کبھی بھی شوکاز نوٹس نہیں دیا گیا اور مجھے اندھیرے میں رکھ کر ایک غریب لاچار بیروزگار اور بے بس ٹیچر کا معاشی قتل کیا جا رہا ہے۔

۵۔ جبکہ مجھے شوکاز نوٹس کے ذریعے خبردار کرنا محکمہ کا فرض تھا۔

۶۔ اس پر مزید ظلم یہ کہ DEO کے بعض افیشل لیٹر میں مجھے سرے سے ہی بالاکوٹ ہائی سکول کا ٹیچر ماننے سے ہی سراسر انکار کیا گیا ہے (جس کی کاپی ہمراہ ہے)

۷۔ بعدازاں میری خصوصی درخواست پر ڈائریکٹر صاحب نے انکوائری کمیٹی کے احکامات صادر کیے اور گواہان اساتذہ، طلباء اور دستیاب ریکارڈ اور حقائق کے مطابق مجھے گورنمنٹ ہائی سکول بالاکوٹ کا باقاعدہ ٹیچر تسلیم کیا گیا۔

ارض

ظاہر شاہ ولد سید بادشاہ ساکنہ لیپر وسی ہسپتال گرلاٹ بالاکوٹ

فون نمبر: 0343-5952351

18-06-2015

Attested

P-19-A
Annx "F"

OFFICE OF THE DISTRICT EDUCATION OFFICE (MALE) MANSEHRA

No._____Dated_____/2014

To

The Assistant Registrar Tight of Information Commission

7th Floor, Tanzeem Plaza Near Benevolent Fund Building

6th Sadar Road Peshawar

SUBJECT: SUPPLY OF INFORMATION UNDER RTIC/AR-2013 (COMPLAINT NO: 00168

Memo;

I am directed to refer to letter No. RIT/IC/10/23/4/91 dated 23 Oct 2014 & No. RTIC/Ar/1-168/14 dated 11 Nov 2014 & No. RTIC/Ar/1-68/14 dated 25 Nov, 2014 on the above noted subject.

It is stated that this office vide letter No. 13779 dated 24-11-2014 directed principal GHS Balakot to provide the requiset information. The Principal have submitted his reply with the remarks that as per available record of the school No such name teacher have served that school.

The same copy is attached for further necessary action please.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No._____ Dated:_____2014

Copy Forwarded for information to:

1. The Director E&SE Peshawar.
2. Monitoring Officer-III ESRU Secretariat of E&SE Deptt: Khyber Pakhtunkhwa
3. Peshawar to his letter No. Mo-II/ESRU/2-9/2014/RTI.Act.2013 dated.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

OFFICE OF THE DISTRICT EDUCATION OFFICE (MALE) MANSEHRA

No. _____ Dated _____ /2014

To

The Assistant Registrar Right of Information Commission

7th Floor, Tanzeem Plaza Near Benevolent Fund Building

6th Sadar Road Peshawar

SUBJECT: SUPPLY OF INFORMATION UNDER RTIC/AR-2014 (COMPLAINT NO: 03158

Memo:

I am directed to refer to letter No. RTI/IC/10/75/M-11 dated 2 Oct 2014 & No RTIC/AR/1-168/14 dated 1 Nov 2014 & No. RTIC/AR/1-68/14 dated 25 Nov 2014 on the above noted subject.

It is stated that this office vide letter No. 13779 dated 24-11-2014 directed principal of Balakot to provide the required information. The Principal have submitted his reply with the remarks that as per available record of the school No such name teacher have served that school.

The same copy is attached to further necessary action please.

DY. DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst. No. _____ Dated _____ /2014

Copy Forwarded for information to.

1. The Director E&SE Peshawar
2. Monitoring Officer in ESRU Secretariat of E&SE Deptt. Khyber Pakhtunkhwa
3. Peshawar to his letter No. Mo-I/ESRU/2-3/2014/RTI-A-2013 dated.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Attested Copy

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Annex "F"

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

No. 15526 Dated 22/12/2014

To

The Assistant Registrar, Right of Information Commission
7th Floor, Tanzeem Plaza, Near Benevolent Fund Building,
6th Sadar Road Peshawar

Subject: - SUPPLY OF INFORMATION UNDER RTI ACT, 2013 (COMPLAINT NO: 00168)

Memo:

I am directed to refer to letter No.RTI/IC/10/23/ 4/91 dated 23 Oct, 2014 & No.RTIC/AR/1-168/14 dated 11 Nov 2014 & No.RTIC/AR/1-168/14 dated 25 Nov 2014 on the above noted subject.

It is stated that this office vide letter No. 13779 dated 24/11/2014 directed Principal GHS Balakot to provide the requisite information. The Principal have submitted his reply with the remarks that as per available record of the school No such name teacher have served that school."

The same copy is attached for further necessary action please.

Encl. (03)

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No. _____ Dated _____/_____/2014

Copy forwarded for information to:

1. The Director E&SE Peshawar.
2. Monitoring Officer -III ESRU Secretariat of E&SE Deptt: Khyber Pakhtunkhwa Peshawar c/r to his letter No. MO –II/ESRU/2-9/2014/RTI Act.2013 dated 08/12/2014.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

2024
26/12/14

Attested

جناب ای۔ڈی۔او صاحب مانسہرہ

جناب عالی

گزارش ہے کہ ہمارے سکول ٹیچر (CT) ظاہر شاہ ولد سید بادشاہ کی سروس بک دوران زلزلہ کچھ سکول ریکارڈ کے ساتھ ضائع ہو گئی ہے

از راہ کرم مذکورہ بالا ٹیچر کو سروس بک جاری کرنے کے احکامات جاری فرمائیں

ٹیچر مذکورہ کے تقرری ارڈر کی کاپی ہمراہ درخواست ہے۔

العارض

انچارج ہائی سکول بالاکوٹ

10/5/2010

PRINCIPAL
Govt. High School
Balakot Mansehra

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD

Service Appeal No. 528/2014

Date of Institution... 28.03.2014

Date of decision... 17.01.2018

Zahir Shah son of Syed Badshah Caste Syed C.T Teacher Government High School, Balakot resident of Garlat Balakot District Mansehra. ... (Appellant)

Versus

1. The Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar and 5 others. .... (Respondents)

Sardar Muhammad Ashfaq, Advocate ... For appellant.

Mr. Usman Ghani, District Attorney ... For respondents.

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN
MR. AHMAD HASSAN, ... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: Arguments of the learned counsel for the parties heard and record perused.

FACTS

2. The appellant as per averments in the memorandum of appeal, proceeded on long leave in the year, 1997 and when he came back the department did not accept his arrival report. That the appellant had been submitting applications to the department for his adjustment but the department did not respond to the said requests. That thereafter, due to earthquake in the year, 2005 as per the appellant, the whole record in his home

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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was destroyed and finally he filed departmental appeal in the year, 2013 which was not responded to and thereafter he filed the present service appeal. During pendency of the present service appeal, the department initiated departmental proceedings against the appellant which are still pending.

ARGUMENTS

3. The learned counsel for the appellant argued that the appellant had been running from pillar to post for redressal of his grievance but the department had been showing cold shoulders to all the requests. That no order of termination was ever passed against the appellant. That there was no other way but to file a departmental appeal and then to approach this Tribunal.

4. The learned District Attorney argued that this Tribunal had no jurisdiction for the reason that there was no original or appellate order within the meaning of Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. That the present service appeal was not maintainable on the ground of limitation as well. That this Tribunal cannot pass any order including direction to the department to conclude the pending enquiry due to lack of jurisdiction.

CONCLUSION.

5. It is a settled jurisprudence that the Tribunal or Courts assumes the jurisdiction subject to law. In the present case there is no original or appellate order as argued by the learned District Attorney in view of Section 4 mentioned above. But the question would be that when the department has not been issuing any order of termination of the appellant and would not issue any such order indefinitely then where the appellant would go in case of wrong done to him. Under the present scheme of law in this Province when there is no other adequate remedy/forum available then the aggrieved person can knock

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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jurisdiction under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973. But again in service matters Article 212 of the Constitution has been given overriding effect over Article 199 by insertion of *non-obstante* clause in Article 212 and thereby Article 199 has been given subordinate status to Article 212 which means that in matters of terms and conditions a civil servant cannot seek remedy under Article 199 mentioned above. It is a settled jurisprudential principle of *ubi jus ibi remedim* (when there is right there is remedy). The civil servant would be left with no remedy at all under the present scheme of law. In such situation, the law as developed since time immemorial has given the concept of hardship cases. (*Epeikea of Aristotle*). Every procedural law has a provision for such hardship cases in the name of "inherent powers of courts or Tribunal". The inherent powers are exercised by the courts and Tribunal when the law provides no solution to a particular situation. In our administrative law this situation has also been dealt with by providing application of Code of Civil Procedure to the procedure of this Tribunal under Section 7 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. Section 151 of the Code of Civil Procedure 1908 deals with the hardship cases and saves the inherent powers of the courts in order to do justice in the mater on which law is silent. So much so that Rule 27 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 also gives inherent powers to this Tribunal in all those matters as mentioned above which surely includes the ends of justice and to prevent abuse of the process of a court or Tribunal.

6. This Tribunal is therefore, of the view that the present case is a case of hardship and the appellant would be left with no remedy if this Tribunal refuses to assume jurisdiction on the technical ground of non-availability of original/appellate order. The department if allowed to continue the present situation by not deciding the appeal of the appellant or by not ordering the conclusion of pending departmental proceedings it would amount to allowing the department to abuse the process of law on the ground of technicality. In such

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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Annex G

situation the superior courts have time and again ruled that technicalities should not come in the way of substantive justice.

7. Another hardship situation in this appeal arise when we go through sub rule 2 of Rule 19 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. According to this sub rule whenever any service appeal is pending before the Service Tribunal then the department become *functus officio* and no order can be passed by the department during pendency of the service appeal. In this case during the pendency of the present service appeal, the department had initiated departmental proceedings against the appellant which are violative of this sub rule. Now the department under this sub rule cannot pass any order. No limitation would run in such unclear cases.

8. In order to resolve this imbroglio this Tribunal in exercise of its inherent powers assumes the jurisdiction without touching the merits of the appeal and directs the department to decide the pending appeal of the appellant as well as the departmental proceedings mentioned above within a period of ninety days of the receipt of this judgment/order. Decided accordingly. Parties are left to bear their own costs. File be consigned to the record room.

SD/-
(Niaz Muhammad Khan)
Chairman
Camp Court, A/Abad

SD/-
(Ahmad Hassan)
Member

ANNOUNCED
17.01.2018

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EX
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Personal hearing of Mr. Zahir Shah EX CT GHS Balakot Mansehra Dated 13-04-2018 at the office of DEO(M) Mansehra (Reference Notification No 6400-1/Estt:(M) dated 10/4/18

Annex "H"

Attested

1- آپ کب ایجوکیشن ڈیپارٹمنٹ میں بھرتی ہوئے اور کس پوسٹ پر؟
2- آپ کی ٹرانسفر گورنمنٹ ہائی سکول بالاکوٹ میں کب ہوئی؟
3- اس سکول سے آپ نے کب Ex-Pakistan Leave کیلئے اپلائی کیا؟
4- آپ کتنا عرصہ اور کون سے ملک میں رہے۔
5- کیا آپ نے سرکاری پاسپورٹ پر بیرون ملک سفر کیا؟
6- کیا آپ نے 1990ء کے بعد اور 1997ء سے پہلے کسی بیرونی ملک کا سفر یا وہاں قیام کیا ہے؟
7- 1997ء کے بعد آپ کتنا عرصہ بیرونِ ملک مقیم رہے (تاریخوں کا تعین کریں)
8- 2000ء کے بعد کب سے کب تک آپ بیرون ملک مقیم رہے؟
9- آپ نے Ex-Pakistan leave کے اختتام پر کب ڈیپارٹمنٹ میں نئی تعیناتی کیلئے اپلائی کیا اور کیا اس کا دستاویزی ثبوت آپ کے پاس موجود ہے؟
10- محمد ساجد خان SCT 1992 سے گورنمنٹ ہائی سکول بالاکوٹ میں تعینات ہیں اُن کے بیان کے مطابق آپ نے 1992ء کے بعد کبھی بھی مذکورہ سکول میں سروس نہیں کی؟ آپ اس بارے میں کیا کہنا چاہتے ہیں۔
11- سلمیٰ شاہین خان GHS بالاکوٹ کے Peon کے مطابق آپ مذکورہ سکول سے اپنی سروس بک Ex-Pak leave کیلئے لے گئے تھے لیکن آپ نے وہ واپس سکول میں جمع نہیں کرائی۔ اس بارے میں آپ کا کیا مؤقف ہے؟
12- زلزلہ 2005ء کے بعد بالاکوٹ ہائی سکول کا جو ریکارڈ بچ گیا تھا اس میں EFF لسٹ 1995ء قبض الوصول 1996ء Payment list مارچ 2000 سے ظاہر ہوتا ہے کہ آپ سکول مذکورہ میں اس عرصہ کے دوران ڈیوٹی پر حاضر نہ تھے۔ اس بارے میں آپ کیا وضاحت کرتے ہیں؟
13- 2012ء سے پہلے GHS بالاکوٹ کے جو انچارج پرنسپل رہے ہیں اُن کے بیان کے مطابق GHS بالاکوٹ میں آپ کی سروس بک موجود نہ تھی۔ جن لوگوں کا ریکارڈ اور سروس بک پہلے موجود تھا وہ آج بھی موجود ہے۔ آپ کی سروس بک موجود نہیں۔ کیا اس سے یہ ظاہر نہیں ہوتا کہ آپ نے سروس بک سکول سے وصول کی تو واپس نہیں کی؟
14- 1992 اور 1995ء کی GP Fund کی کٹوتی کی لسٹ جو GHS بالاکوٹ کے ریکارڈ سے ملی ہے اس کے مطابق آپ مذکورہ سکول میں اس عرصہ کے دوران ڈیوٹی پر نہ تھے کیونکہ کٹوتی کی فہرست میں آپ کا نام موجود نہیں ہے؟ آپ اس کے متعلق کیا وضاحت کرتے ہیں؟
15- آپ اپنے مؤقف کی تائید میں مزید کیا کہنا چاہتے ہیں؟ کوئی دستاویزی ثبوت اگر آپ کے پاس موجود ہے وہ بھی مہیا کریں

کھیتی میرا تبدیل
13-4-18
1- محمد نسیم خان پرنسپل
GHSS

2- ظاہر بشیر
SDEO(M) مانسہرہ

(1) 13-10-83 کو C-T پوسٹ پر

(2) 24-08-84 کو بالاکوٹ ہائی سکول ٹرانسفر ہوئی

(3) 1997ء

Attested

(4) تین (03) سال - سعودی عرب

(5) جی ہاں - حکومت پاکستان کے جاری کردہ پاسپورٹ پر

(6) جی نہیں

(7) 2000ء تک

(8) 2000ء میں گھریلو پریشانیوں کی وجہ سے واپس آنا پڑا - پھر نہیں گیا

(9) 2000ء کے اختتام پر میری تعیناتی کیلئے درخواستیں دیتا رہا جسکا ثبوت میری ڈوپلیکیٹ سروس بک میں موجود تھا جو زلزلہ 2005 گھر زمین بوس ہونے سے ضائع ہوا -

(10) مذکورہ صاحب بھی اسی مخالف گروپ کا حصہ ہیں جنہوں نے کہا تھا کہ "طاہر شاہ" نام کے کسی استاد نے میرے سے ہائی سکول بالاکوٹ میں سروس ہی نہیں کی -

(ثبوت صفحہ نمبر 1 پر)

(11) مسمی شاہ زمان Peon کی مکمل کہانی اسی مذکورہ گروپ نے ترتیب دے کر ایک Fabricated story بنائی - یہ ان کی ہی کارستانی ہے جسکا حقیقت سے کوئی تعلق نہیں - جبکہ مسمی شاہ زمان Peon کی بیان حلفی بیچ کا کھلا ثبوت ہے -

(ثبوت صفحہ نمبر 2 پر)

(12) یہ بیان بھی مذکورہ گروپ کی کارستانی اور ہتھکنڈہ ہے - جنہوں نے مجھے ہائی سکول بالاکوٹ کی لسٹ سے ہی نکال باہر کرنے کیلئے ہر حربہ استعمال کیا - اور EDO صاحب نے بھی ان کے بیان کی تصدیق کی (ثبوت صفحہ نمبر 3 پر)

(13) یہ بھی حضرت پرنسپل صاحب کی مہربانی ہے اور کارستانی ہے - حالانکہ مسمی شاہ زمان Peon زندہ سلامت موجود ہے اور گواہی کیلئے ہر وقت دستیاب ہے - علاوہ ازیں سروس بک گزٹیڈ آفیسر کے ہی حوالے کی جاتی ہے اور کلرک باقاعدہ رسید لیتا اور اندراج کرتا ہے -

(14) یہ سارا معاملہ اپنی غلطیاں ڈھانپنے (گمشدگی سروس بک جو کہ انتظامیہ کی ذمہ داری تھی) کی ایک کوشش اور سائل کے ساتھ ظلم ہے - اپنے عیب Cover کرنے کی کوشش ہے

(15) 1. میں مذکورہ سکول میں استاد تھا - اور اپنے ناموں سے نجات کیلئے محکمے سے انصاف اور رحم کی اپیل کرتا ہوں تاکہ میری بحالی ہو سکے -

2. مجھے آج تک کسی بھی وجہ پر کوئی بھی شوکاز نوٹس یا برطرفی (زبانی تحریری) نہیں ملی

3. سائل اب کس دروازے پر جائے اور اس 56 سال کی عمر میں کیا کرے ؟

4۔ سائل کا گھر اور تمام اسباب جانی نقصانات کے زلزلہ 2005 میں ختم ہو گیا ہے۔ سائل انتہائی ذہنی پریشانی، ذہنی دباؤ اور سخت مفلسی کا شکار ہے۔ از راہ کرم انصاف کیا جاوے تاکہ سائل ایک باعزت شہری کی طرح زندگی گزار سکے۔

فقط

ظاہر شاہ

14-04-2018

نوٹ:۔ انتظامیہ (EDO) آفس نے سائل کو کہا تھا کہ سروس بک کی پرسنی گمشدگی کی رپورٹ لاؤ تاکہ نئی سروس بک اشیو کی جا سکے، اسکے علاوہ پرنسپل سے بھی تصدیق لاؤ گمشدگی کی تاکہ نئی ڈپلیکیٹ بنا کر دی جائے۔ لیکن کوئی عمل درآمد نہیں ہوا

(ثبوت صفحہ نمبر 3، 4)

H406377 ANNEXURE "H" P-27

Rupees 30 ۳۰ روپیہ

بیان حلفی بر یک قطعہ اسٹامپ مالیتی 30/- روپے

منکہ شاہزمان خان ولد ملک آمان خان قوم سمورنی ساکن پوڑی تحصیل بالاکوٹ ضلع ہاسرہ کا ہوں۔

حلفاً ضروری ہوں کہ ظاہر شاہ ولد سید بادشاہ ساکن گرلڈ CT گورنمنٹ ہائی سکول بالاکوٹ کی سروس بک کا مجھے کوئی علم نہیں ہے کیونکہ میں کلاس فور ہوں یہ ہائی سکول بالاکوٹ کے متعلقہ کلرک کا کام ہے آپ متعلقہ بابو سے اسکی معلومات کر سکتے ہیں اس واقعہ کو کم و بیش کافی عرصہ ہو چکا ہے میں کلاس فور کی حد تک ہائی سکول بالاکوٹ کی گھنٹی بجانے تک محدود ہوں مجھے قطعی طور پر اس کا علم نہیں ہے اگر میں اس میں کسی قسم کی غلط بیانی کروں تو میں اس کا ذمہ دار ہوں۔

بیان حلفی ہذا درستی پر مبنی ہے کوئی امر مخفی / مجبوب نہیں رکھا گیا

لہذا بیان حلفی سنداً تحریر ہے۔ راقم 18/12/2015 بالاکوٹ

شاہزمان خان ولد ملک آمان خان مخلف مذکور

13501-1292938

WALI UR REHMAN ADVOCATE NOTARY PUBLIC MANSEHRA No. Date 18/12/15

تیمور فدا ولد فدا محمد سکنہ بلیانی کفیل بالاکوٹ 13501-3723923-1

نیاز محمد نائب تحصیلدار تحصیل بالاکوٹ 18/12/2015

حبیب الرحمان ولد عبدالقیوم 13501-5039300-7

3770 / 18-7-75 یک قطعه رشته مرب ماشینی 30/- پیرو مدت شاه [illegible] خان و [illegible] خان ساکن [illegible] تحصیل [illegible] ضلع [illegible] (برای بیان حلفی)

13501-1292938-7

Muhammad Hamid
D.A.O Mansehra
Head Treasurer

[illegible]

Attested

P-28

Annx-I

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT MANSEHRA
Phone # 0997-382271 Fax # 0997-382244
E-mail Address: edoedu_mansehra@yahoo.com
Facebook Page: www.facebook.com/DEOMMANSEHRA

NOTIFICATION

I, Zaffar Arbab District Education Officer (Male) Mansehra as competent Authority for deciding an appeal which was entrusted to me by Honorable Khyber Pakhtunkhawa Service Tribunal camp court Abbottabad, vide judgment dated 17-01-2018 and received on 06-02-2018 in appeal No. 528/14 title Zahir Shah Vs Govt of Khyber Pakhtunkhawa, whereupon the appeal of the appellant is converted into Departmental Appeal.

1. WHEREAS an inquiry committee was constituted for the purpose to probe into the matter vide this office No. 6400-01 dated 04-10-2018.

2. WHEREAS inquiry committee submitted his report along with recommendations that: -
   Mr. Zahir Shah Ex-CT does not deserve be reinstated in to service after gap of 25 years.

3. AND WHEREAS the competent authority District Education Officer (M) E&SE Mansehra after having considered the report of the inquiry committee, available relevant record/documents, is of the view that the submission an appeal before Honorable Khyber Pakhtunkhwa Service Tribunal camp court Abbottabad, could not be considered for any relief.

NOW, THEREFORE, in exercise of the powers conferred under Section 21 of General Clauses Act, 1897, the departmental appeal is hereby rejected.

-sd-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHR

Endst: No. 7494-98 /Estt:(M)/ /Dated 02/5 /2018

Copy forwarded for information to the:

1. Registrar Honorable Khyber Pakhtunkhawa Service Tribunal Peshawar with reference to his 233/ST dated 30-01-2018.
2. Secretary Govt: of Khyber Pakhtunkhawa Elementary & Secondary Department Peshawar.
3. Director E&SE Khyber Pakhtunkhwa Peshawar.
4. Principal GHS Balakot Mansehra.
5. Zahir Shah R/O Village Mohar Tehsil & District Mansehra.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Attested

P-29

Annex-J

بخدمت جناب سیکرٹری تعلیم صاحب (ایلیمنٹری اینڈ سیکنڈری ایجوکیشن پشاور

محکمانہ اپیل

جناب عالی! اپیل ذیل عرض ہے۔

۱)۔ یہ کہ من سائل سال 1983ء میں محکمہ تعلیم میں بطور CT ٹیچر بھرتی ہوا اور سال 1984ء میں من سائل کا تبادلہ گورنمنٹ ہائی سکول بالاکوٹ میں ہوا۔

۲)۔ یہ کہ سال 1997ء میں سائل ایکس پاکستان Leave پر بیرون ملک چلا گیا اور سال 2000 جب واپس وطن آیا تو محکمہ کو اپنے Arival Report دی جس پر محکمہ آج اور کل پر ٹالتا رہا بالآخر مجبور ہو کر قبل ازیں بھی محکمانہ اپیل دائر کیں۔ جس کا کوئی جواب موصول نہ ہوا جس کے بعد من سائل نے سروس اپیل نمبری 528/2014 مورخہ 28.03.2014 کو دائر کی۔ جو مورخہ 17.01.2018 کو محکمہ تعلیم کو اس ہدایت کے ساتھ واپس ہوئی کہ من سائل کا Disciplinary Action اور چارج شیٹ مورخہ 01.06.2015 کے تحت حسب ضابطہ کاروائی کی جائے۔ لیکن ڈسٹرکٹ ایجوکیشن آفیسر میل مانسہرہ نے نوٹیفکیشن End7494-98/ESTT.M محررہ 02.05.2018 کو من سائل کو نہ تو سروس میں Reinstate کیا اور نہ ہی من سائل کو Suspend کیا اور نہ ہی Dismiss from service کیا۔ (نقولات لف ہیں)۔

۳)۔ یہ کہ من سائل کی اپیل نمبری 528/2014 کی اصل روح کو آفسر مجاز سمجھنے سے قاصر ہے۔

استدعا ہے کہ سروس اپیل نمبر 528/2014 کے تحت \ من سائل کو یا تو محکمہ تعلیم میں Reinstate کیا جائے یا Dismiss from service کیا جائے تاکہ من سائل مطلوبہ دادرسی فاضل سروس ٹریبونل سے حسب ضابطہ حاصل کر سکے۔

لہذا آپ سے استدعا ہے کہ آپ محکمانہ اپیل کو consider کرتے ہوئے من سائل کو سروس میں بحالی کے احکامات صادر فرمائیں۔

المرقوم 19 مئی 2018ء

العــــــارض

ظاہر شاہ ولد سید بادشاہ ساکنہ گرلاٹ تحصیل بالاکوٹ ضلع مانسہرہ

رابطہ نمبر: 0343-5952351

No.1225 Received a registered* addressed to

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

Initials of Receiving Officer

Date Stamp

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

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

Insurance fee Rs. Ps.

Weight (in words) Kilo Grams

Name and address of sender

If insured

P-30

وکالت نامہ

بعدالت جناب خیبر پختونخواہ سروس ٹریبونل KPK پشاور

کیمپ کورٹ ایبٹ آباد

ظاہر شاہ بنام حکومت KPK بذریعہ سیکرٹری تعلیم وغیرہ

سروس اپیل

منجانب: اپیلانٹ

باعث تحریر آنکہ!

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے پیروی وجواب دہی بمقام KPK سروس ٹریبونل

ملک اشفاق احمد جیلانی ایڈووکیٹ ہائی کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رُوبرُو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہوگیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام کچہری کے آگے یا پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجرائے ڈگری ونظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپرد ثالثی وراضی نامہ ودستبرداری واقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل وبرآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ ڈگری واجرائے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیٰحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل ونگرانی کسی دوسرے وکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پرداختہ مثل ذات خود منظور وقبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 27/08/18

ظاہر شاہ ولد سید بادشاہ قوم سید ساکنہ گرلاٹ بالاکوٹ ضلع مانسہرہ/CT ٹیچر گورنمنٹ ہائی سکول گیالاکوٹ

Attested & Accepted

Malik Ashfaq Ahmed Jellani
High Court Mansehra

(original copy)

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

Appeal No.1128-A/2018

Zahir Shah.....APPELLANT.

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (Male) Mansehra.....RESPONDENTS.

PARAWISE COMMENTS / WRITTEN REPLY ON BEHALF OF RESPONDENTS NO 1, 2 AND 3.

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DISTRICT EDUCATION OFFICE
(MALE) MANSEHRA.

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

Appeal No.1128-A/2018

Zahir Shah.....APPELLANT.

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (Male) Mansehra.....RESPONDENTS.

PARAWISE COMMENTS / WRITTEN REPLY ON BEHALF OF RESPONDENTS NO 1, 2 AND 3.

PRELIMINARY OBJECTIONS:-

1. That the Appellant is not the "AGGRIEVED" person.
2. That the Appellant is stopped by his own conduct.
3. That the Appellant has not come to the Hon'ble Tribunal with clean hand.
4. That the Appellant has no cause of action/locus standi to file the instant appeal.
5. That instant Appeal is against the prevailing law and rules.
6. That the Appellant has concealed the material facts from this Hon'ble Tribunal. Hence not entitled for any relief and appeal is liable to be dismissed without any further processing.
7. That the appeal is groundless and based on malafide, ulterior motive, hence the same is liable to be dismissed.
8. The instant appeal is not maintainable in the present form and also in the present circumstances of the issue.
9. That the demand of the appellant is against the law and facts hence the appellant is not entitled for any relief and appeal is liable to be dismissed on this score alone.
10. That after the long gape of 25 year he cannot be reinstated into the services.

Factual Objections:-

1) Para No.1 is pertains to the service record of the appellant, hence need no comments.

2) Para No. 2 is totally incorrect and misleading that the appellant was appointed CT vide Endst no.21516-97 dated 13/10/1983, whereas the copy of transfer order vide Endst No. 17515-34 dated 27/08/1983 to GHS Balakot . Which is very surprising because is a person can be transferred before the appointment? Which shows that both the order of the appellant are fake/ bogus. Whereas the same has been highlight by the inquiry committee.***(Copy of the appointment order dated 27/10/1983 and Copy of the transfer order dated 27/058/1983 are annexed as annexure A &B)***

3) Para No.3 is totally misleading because the no record of the appellant was found at GHS Balakot never apply for any kind of leave nor he has any record regarding this leave. In the verification regarding the Zahir Shah the statement of the different teachers were taken by the inquiry

committee. The statement of Incharge Principal M.Wajid Ali khan, the reply of M. Hassan & Tahir Khan, the statement Zahir Shah, statement of Class -IV Shah Zaman, Statement of M. Sajid Khan ,the affidavit of Class IV Shah Zaman are also present on the record. ***(Copy of all statement are annexed as annexure C,D,E,F,G & H)***

4) Para No.04 is totally incorrect and misleading that the appellant has never applied for Ex- Pakistan Leave nor performed his duty at GHS Balakot. But after 21 year he submit a departmental appeal that he was Ex-CT Teacher at GHS Balakot

5) Para No.5 is incorrect because in the light of the appeal the first inquiry committee was constitute vide Endst No.1475-76 dated 29/01/2015. The inquiry submitted his report. According to the report of the inquiry committee the statement of the Teacher Muhammad Sajid is very important. According to his statement "***he has been serving at GHS Balakot since 1992 but he did not see Mr. Zahir Ex-CT did not serve at GHS Balakot after 1990".*** Inquiry committee report on the behalf of written statement also stated that the appellant Zahir Shah did not serve at GHS Balakot after 1990. And he also failed to provide the record of his application for adjustment and sanction of leave. The inquiry committee recommended that appellant does not deserve to re-instate in the service after the gap of 25 year. ***(Copy of the inquiry Report is Annexed as annexure I)***

6) Para 6 is correct hence need no comments.

- Pare No. 7 is incorrect, whereas on the direction of the Worthy Tribunal the Competent authority again constituted the inquiry committee to dig out the fact about the case of the appellant before deciding the appeal of the appellant. The committee was constituted vide Endst No. 6400-1 dated 10/04/2018. The inquiry submitted his report on 26/04/2018. According to inquiry report Findings "***he failed to provide Sanction of Ex-Pakistan Leave and extension thereof, is service book, pay slip acquaintance roll, even personal No or GP fund issued by the District Account office".*** Record provided by the Principal GHS Balakot vide letter No. 316 dated 13/12/2014 to DEO (M) Mansehra in his response to his letter No. 3779 dated 24/11/2014 including EEF list for the year 1995, Acquaintance roll pay bill of 1996 and acquaintance roll of year 2000, all those documents shows that he had served in the school as hid name his not listed as teacher in these documents. So in the light whole record committee recommended that " ***the appellant does not deserve to be reinstated in service after gap of 25 year and his departmental appeal may be rejected*** " ***(Copy of the inquiry report, copy of the bill 1295, Copy of pay bill 1995, copy of pay bill year 1996, are annexed as annexure J , K , L & M)***

7) Para No.08 is incorrect that the on the basis of valid record and solid grounds the appeal of the appellant was rejected by the competent vide Endst No.7494-98 dated 02/05/2018. ***(Copy of the Rejection of the appeal is annexed as annexure N)***

8) Para 9 is correct, hence need no comments.

9) That appellant have no right to invoke the Constitution jurisdiction of this Hon'ble Tribunal, the appellant is not aggrieved Person inter alia on the following Grounds:-

GROUNDS:-

a) Incorrect and denied, detail reply is already been given in the above para.

b) Incorrect and denied. Detail reply has already been given in the above para.

c) Incorrect and denied, Detail reply has already been given in the above para.

d) Incorrect and denied, whereas the appellant was not on strength of the department. Also on basis of suspicious transfer order before the appointment order, hence in such situation the appellant has no right to be proceeded under E &D rule 2011.

e) Incorrect and Denied, detail reply has already been given in the above Para.

f) Incorrect and denied, detail reply is already been given in the above para.

g) Incorrect that the on the basis of valid record and solid grounds the appeal of the appellant was rejected by the competent vide Endst No.7494-98 dated 02/05/2018.

PRAYER:-

It is therefore, humbly prayed that on acceptance of the above submissions, the instant appeal may very graciously be dismissed in the favour of the answering Respondents in the interest of the Justice

Respondents.....

The Secretary
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
(Respondent No.1)

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
(Respondent No.2)

The District Education Officer,
(Male) Mansehra
(Respondent No.3)

(4)

AFFIDAVIT

I, Muhammad Toseef, Assistant DEO(M) Mansehra hereby solemnly affirm and declare that the content of the reply of the comments in the above appeal No.1128-A/2018 titled as Zahir Shah versus Education Department are true to the best of my conviction and belief and I have concealed nothing.

ASSISTANT DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Ann-A 5 (33)

OFFICE OF THE DIRECTOR OF EDUCATION(SCHOOLS)HAZARA DIVISION ABBOTTABAD.

OFFICE ORDER NO. 94 /CT(M)

DT:A.ABAD,THE 13.10 /83.

APPOINTMENTS/TRANSFERS/ADJUSTMENTS:

The following appointments/transfers/adjustments of CTs/SVs (Male)are hereby ordered in the interest of public service with immediate effect:-

S.No	Name & Address	From	To	Remarks
1.	Arif Hussain Shah,BSc s/o Mehdi Hussain Shah Vill:Rajan P.O.Tarnawai,ATD.	Cadt:	GHS Tarnawai	Agst:N/Created CT post.
2.	Zahir Shah,FSc s/o S.Bad Shah Vill:Garlat Balakot Mansehra.	Cdt:	GHS Boi	Vice Abdur Qadir CT promoted to SET post.
3.	Ali Akbar,s/o Molvi Feroz Vill:Battagram Mansehra.	"	GHS Battagram	Vice Mohd Ayub,CT promoted to SET post.
4.	Munsif Khan s/o Rehmatullah Khan Vill:Piswal Mian,P.O. Public School,ATD.	"	GHS Nagri Tutial.	Agst:vacant CT post.
5.	Rafiullah s/o Mukhtaar Nabi Vill:Rajdhani Battamohri Mansehra.	"	GMS Dilbori	----do----
6.	Khalid Zaman s/o Khan Mohd Vill:Saradna Haripur.	"	GMS Kotla	---do----
7.	Sardar Ali s/o Mohd Khan V&PO Battagram Mansehra.	"	GMS Kanai	Vice Saeed Akhtar CT alrdy:Trfd:
8.	Mohammad Nawaz,s/o Mohd Aslam V&PO Tannan,A.Abad.	"	GHS Lora	Vice [illegible] El SV alrdy:trfd:
9.	Ihsanullah s/o Qazi Sibghatullah V&PO Shergarh Mansehra.		GMS Kolika	Agst:vacant SV post.
10.	Mohammad Daud s/o Mohd Yousuf c/o Haroon Gen:Store,Sadar Bazar A.Abad.	"	GHS Namli Maira	---do---
11.	Fazal Dad s/o Umar Din V&PO Jhangra,ATD.	"	GHS Store	Agst:vacant CT post.
12.	Abdul Salim s/o Roshan Din Vill:Derwesh Pangwwarian Wala Haripur.(Ex-Serviceman L/Naik)	"	GMS Derwesh	Agst:N/Created SV post.
13.	Qazi Jamilur Rehman,FSc s/o Q.Habibur Rehman,V&PO Shergarh Mansehra.	"	GHS Gidderpur	Agst:vacant SV post(To provide Science Teacher).
14.	Ayyaz Hussain,FSc s/o Habibur Rehman Moh:Aurangabad Chitti Dheri Mansehra.	"	GHS Ghazi	Vice Sher Azam CT died.
15.	Mohammad Ayyaz,FSc s/o Mohd Khan Vill:Gulmaira G.H.Ullah Mansehra.	"	GMS Hadora Bandi.	Agst:vacant SV post.
16.	Mohammad Tariq,FSc s/o Khushal Khan Vill:Juna Chamhatti,ATD.(Teacher Son)		GHS Kuthiala	Agst:vacant SV post(To provide Science Teacher).
17.	Shah Zaman,FSc s/o Mir Alam Vill: Dadar Mansehra.	"	GMS Chamhad	Agst:vacant SV post.
18.	Tahir Saeed Siddiqui,FSc s/o Mohd Saeed Siddiqui Vill: Harhalla Dadar Sanitoriom.	"	GMS Kanthiali	------do----

Contd:page-2-

19.	Mohammad Javed s/o Abdul Latif c/o Khurshid Hotel G.H.Ullah Mansehra.	Cdt:	GMS Kothera	
20.	Alam Zeb s/o Abdul Sattar Behali Mansehra.	"	GHS Khanspur	----do
21.	Shabir Ahmad s/o Khanizaman V&PO Sherwan A.Abad.	"	GHS Gadda	Agst:N/Created CT post.
22.	Shahzada s/o Anwar Khan V&PO Mongon Mansehra.	"	GMS Jalgali	Agst:N/Created SV post.
23.	Shaheen Iqbal s/o Mohd Yousuf Khan Shopkeeper Gali Bazar Serai Saleh.	"	GHS Ghazi	Agst:vacant post.
24.	Mubarak Zeb s/o Aurangzeb Swatti Vill:Faqirabad PO Battar Kot Mansehra.		GMS Bassian	----do------
25.	Mohammad Sadiq HEDO Gandhian Via Rehana Haripur.(Ex-Serviceman Naib Subedar)	"	GMS Gandhian Haripur.	----do-----
26.	Saeedur Rehman s/o Gohar Rehman Moh:Noshad Dhodial Mansehra.(Teacher Son).	"	GMS Jalgali	Agst:N/Created CT post.
27.	Mohammad Salim s/o Fida Mohd V&PO Jarral A.Abad.	"	GMS Jarral	Agst:vacant SV post.
28.	Haroonur Rashid s/o Abdul Wahab V&PO Sherpur Mansehra.		GMS Tori Sharif	Vice Sr:No.42
29.	Safdar Hussain s/o Anwar Shah c/o W Vanity Shoe Link Road ATD. (Ex-Serviceman Spey)		GHS Baghpur Dheri	Vice Sr:No.
30.	Mohammad Farooq s/o Molvi Rahimullah c/o Suba Khan Shopkeeper Garlat Bazarx Balakot Mansehra.		GMS Kala	Agst:vacant SV post.
	EX-SERVICEMAN QUOTA.			
31.	Umar Said s/o Abdullah Shah Vill:Kund Basham Battagram Mansehra.(Ex-KDB Serviceman)	Cdt:	GMS Kund	Agst:N/Created SV post.
	EDUCATION EMPLOYEES SON QUOTA.			
32.	Mushtaq Ahmad s/o Mohammad Aslam V&PO Labarkot Mansehra(Tech:Son)	"	GMS Labarkot	Agst:vacant SV post.
33.	Zulfiqar Ahmad s/o Abdul Ghafoor V Sajikot Qalandarbad(Class-IV Son)		GMS Gadda	Agst:N/Created SV post.
34.	Farid Shah s/o Shah Mohd Ghous HM GHS Data(Teacher Son).	"	GHS Tarnawai	Vice Sr:No.37
	TRANSFERs			
35.	Mohammad Sohrab CT	GHS Baghpur Dheri.	GMS Choi	Vice Sr:No.36.
36.	Abdul Saghir CT	GMS Choi	GHS Najifpur	Agst: Vacant post.
37.	Khalid Mehmood,FA,CT	GHS Tarnawai	GHS Mirpur	Vice Mohd Shoa not joined
38.	Aftab Ahmad,CT	GMS Sangar	GMS Labarkot	Agst:N/Created CT post.
39.	Saeed Ahmad,CT	GMS Basian	GMS Sangar	Vice Sr:No.38.
40.	Mian Shahzad Gul,CT 1978.working on JV post	GHS Kund	GMS Kund	Agst:N/Created CT post.in B.S. 9.
41.	Mumtaz Khan,CT,GMS Nareela Und er transfer to GHS Kahal		GMS Derwesh	Agst:N/Created CT post we.from 11-10- the date of arrival at GHS Kahal.

	Mohammad Yaqoob, CT	GMS Tori Sharif	GHS Pattan Khurd	Agst: vacant CT post.
	Khaliqus Zaman, CT, GHS Berkte.	On return from Long Leave.	GMS Bassian	Vice Sr:No.39.
44.	Said Akbar Shah s/o Mohammad Shah Vi 11:& PO Bilandkot Battagram Manschra.(B.A).	Cdt:	GMS Sakhargah Battagram.	Agst: vacant SV post.

Notes:-

1. Charge reports should be sent to all concerned in duplic--ate.
2. No TA/D A or TG is allowed to any one.
3. All untrained candidates will get Initial scale of CT/SV i.e. 620-p.m.fixed and 590/-p.m.fixed.respectively
4. All the newly appointee candidates are required to produce their age and Health Certificate from the Medical Supdt: and no pay etc shall be drawn unless and untill they produce the above certificate from the said officer.
5. Educational/Professional qualfications of cadts: should be checked before handing over charge to them.
6. The appointment of candidates shall automatically stand cancelled if they failed to join the post within 15 days of the issue of this order.
7. The candidates should not be given the charge of post incase their age below 18 years or exceed 30 years However in the cases of Ex- service man 10 years service X Defence Forces atleast 10 years concession is allowed. Provided they have served in X
8. Incase of resignation they should have to give one month prior notice or forfiet one month pay in lieu of notice.
9. The appointments of candidates are puerly on temporary basis and liable to termination without notice or reason.

(MOHAMMAD RAFIQ KHAN JADOON)
DIRECTOR OF EDUCATION(S),
HAZARA DIVN: ABBOTTABAD.

Endst:No. ~~21516~~ 97 /AE.III CT/SV Dated A/Abad the 13.10. /1983.

Copy to :-

1. The Director of Education (S), N.W.F.P.Peshawar.
2-4 The DEO(M) Abbottabad, Mansehra and Kohistan.
5-8. The S.D.E.O.(M) Abbottabad, Mansehra, Haripur and Battgram.
9-25 The Headmasters, GHS Tarnawai, Boi, Battagram, Nagri Totial, Lora, Namli maira, Satora, Gidderpur, Ghazi, Kuthiala, Kanthiali, Khanaspur Gadda, Baghpur Dheri, Najafpur, Mirpur, PattanKhurd.
26-44 The Headmaster GMS, Dilbori, Kotla, Kanai, Kolika, Darwesh, Hadora Bandi, Chamhad, Kodera, Jalgali, Basian, Ghandian Haripur, Jarrak Tori Shareef, Kiala, Kund, Lbarkote, Choi, Sangar & SakarGah.
45-79 All candidates concerned.
80 The ADE Local Directorate.
81 V AE.
82. Office order File.

DIRECTOR OF EDUCATION(S),
HAZARA DIVN: ABBOTTABAD.

Anx: B"

8

31

OFFICE OF THE DIRECTOR OF EDU:(SCHOOLS)HAZARA DIVISION ABBOTTABAD.

OFFICE ORDER NO. 170 /CT(M)

TRANSFERS/ADJUSTMENTS:

The following transfers/adjustments of CT(Male)are hereby ordered in the interest of public service with immediate effect:-

Sr:No.	Name	From	To	Remarks
1.	Khalid Zaman,CT	GMS Kotla	GHS Najifpur	Agst:vacant CT post
2.	Zahir Shah,CT	GHS Boi	GHS Balakot	----do------
3.	Sultan Sikandar,CT	GMS Gijbori	GHS Tailoos	Vice Sr:No.4.
4.	Mohammad Saeed,CT	GHS Tailoos	GMS Gijbori	Vice Sr:No.3.above
5.	Tanveer Hussain Shah SV.(Untrained)	GMS Tarhat	GMS Tarhat	Agst:vacant CT post @ Rs:620/-PM(Fixed)
6.	Mohammad Yousuf,CT (UTd:)	GHS Kangra Colony	GHS Kotgali	Vice Sr:No.8.
7.	Matiullah,CT	GMS Salam Khund	GHS Sarri	Vice Jamil(Utd:)CT resigned for service
8.	Gulzar Ahmad,CT	GHS Kotgali	GMS Khait Sarash.	Agst:vacant CT post
9.	Manzoor Elahi,CT	GMS Garam Thun.	GHS Chhoi	Agst:N/Created CT post.
10.	Mohammad Ishfaq,CT (Untrained).	GMS Hadora Bandi,	GHS Balakot	Agst:vacant CT post.

Notes:- Charge reports should be submitted to all concerned. No TA/DA & TG is allowed to any one.

(Mohammad Rafiq Khan Jadoon)
Director of Education (S),
Hazara Division Abbottabad.

Endst:No. 17515-34 /Adjustment/Trf:/CT/SV(M) Dt: A.Abad, the 27/8/83

Copy forwarded for information to the:-

1-2. Distt:Education Officers(Male)A.Abad & Mansehra.
3-6. The S.D.E.O.(M), Abbottabad, Haripur , Battagram & Mansehra.
7-12. The Headmaster GHS Najafpur, Balakote,Tailoos,Chhoi,Kangra Coloney, and Sarri
13-16 The Headmaster GMS Kotla,Gijbori, Tarhat, Khait Sarash. S.Kand
17. V- AE. Local Directorate.
18. O.O.File.
19. A.D.E. Local Directorate.

G.Mohammad
FOR/ DIRECTOR OF EDUCATION(S),
HAZARA DIVN: ABBOTTABAD.
27/8/83

Anx: C

(9)

(A)

21

658

ایم واجد علی خان صاحب

انچارج گورنمنٹ ہائی سکول مالاکوٹ

آپ کے سکول کے ایک سابق C.T ظاہر شاہ نے اپنی نوکری کی بحالی کے لیے DEO مردانہ ضلع مانہرہ کو ایک درخواست دی ہے جس پر DEO صاحب نے انکوائری کمیٹی مقرر کی ہے اس ضمن میں آپ سے درج ذیل سوالات پوچھے جاتے ہیں اور آپ کو ہدایت کی جاتی ہے کہ آپ مذکورہ سوالات کے تحریری جوابات دیں تاکہ انکوائری کے Process کو مکمل کر کے رپورٹ حکام بالا کو بھیجی جا سکے۔

س نمبر (1) کیا ظاہر شاہ نے آپ کے سکول میں بحیثیت C.T ٹیچر فرائض سرانجام دیئے ہیں؟ اگر دیئے ہیں تو کب سے کب تک تاریخ اور سال بھی درج کریں۔

س نمبر (2) کیا ٹیچر مذکور آپ کے سکول سے Ex-Pakistan Leave پر گیا ہے؟ اگر گیا ہے تو کب سے کب تک Leave پر رہا ہے؟

س نمبر (3) کیا ٹیچر مذکور نے Ex Pakistan Leave مکمل کرنے کے بعد دوبارہ آپ کے سکول میں حاضری کی ہے؟

س نمبر (4) کیا ٹیچر مذکور نے اپنی Adjustment کے سلسلے میں درخواست اس وقت کے انچارج پارسنل سے DEO آفس کو Forward کروائی ہے؟ اگر کروائی ہے تو آپ کے پاس کسی قسم کا ریکارڈ Diary / Dispatch موجود ہے؟

س نمبر (5) کیا محکمہ نے ٹیچر مذکور کی ضلع مانہرہ میں کسی سکول میں Adjustment کی ہے؟

س نمبر (6) کیا آپ کے سکول میں ٹیچر مذکور کی Ex-Pakistan Leave کی منظوری کا کوئی آرڈر موجود ہے۔ مہیا کیا جائے؟

س نمبر (7) کیا ٹیچر مذکور کی سروس بک آپ کے سکول میں موجود ہے؟

س نمبر (8) دوران زلزلہ 2005 میں ظاہر شاہ C.T کے علاوہ اور کس کس کی سروس بک وغیرہ ضائع ہوئی ہیں؟

س نمبر (9) سکول حاضری رجسٹر کے ریکارڈ ٹیچر مذکورہ کی حاضری کا ریکارڈ مہیا کیا جائے؟

عبدالماجد

Service Tribunal
Peshawar

(10)

جناب گرامی القدر ممبران انکوائری کمیٹی میں بحیثیت

54 انکوائری کے سلسلہ میں مندرجہ ذیل گزارشات عرض

(B-1)

کر رہا ہوں۔

(1) شخصی شواہدات کے مطابق مذکورہ ٹیچر نے 1984

تا 1990 تک سکول ہذا میں بحیثیت آئے ٹیچر کام کیا ہے

جبکہ تباہ شدہ ریکارڈ کے مطابق اُن کا 1990 کے بعد

اُن کے یہاں ہونے کے کوئی شواہد نہیں۔

(2) ٹیچر مذکورہ کے باہر جانے کے بارے میں اُس وقت کے

انچارج بخوبی واقف ہونگے لیکن اگر ایکس پاکستان چھٹ

ہو گئے ہیں تو یقیناً سروس بک اُن کے پاس ہو گی۔

(3) ٹیچر مذکورہ نے آج تک یہاں حاضری نہیں کی۔ کچھ پوسٹ

رجسٹرڈ معلمین اس کے گواہ ہیں۔

(4) ٹیچر مذکور کے دوبارہ Adjustment کے کوئی ریکارڈ نہیں

(5) چونکہ ریکارڈ کا بڑا حصہ تباہ ہوا اور بعد از زلزلہ

آگ کی نظر ہوا لہذا Ex. Pak. Leave کا کوئی آرڈر

نہیں ہے

(6) میرے سکول میں جملہ اساتذہ کی سروس بکس دوران زلزلہ

PRINCIPAL
Govt. Pri. School
Balakot, Mansehra

(11)

جبکہ مذکورہ ٹیچر کی سروس بک میں
ٹیچر کی حاضری رجسٹر کے مطابق 1992
1996 بوسیدہ حالت میں موجود ہیں اُن
مذکورہ ٹیچر کا ذکر نہیں ہے۔

جناب عالی! متوجہ گزارش ہے کہ میں نے بحیثیت انچارج
GHS بالاکوٹ میں مورخہ 09/10/2012 کو چارج لیا
ہے مذکورہ ٹیچر کی دفعہ سابقہ انچارج صاحبان
ریکارڈ طلب کرتے رہے ہیں جس کے وہ خود بھی
گواہ ہیں مگر آج تک کوئی چیز اُن کے بارے میں
نہیں ملی۔ میں بحیثیت انچارج آپ سے استدعا
کرتا ہوں کہ مذکورہ ٹیچر کے بارے میں
کوئی حل تلاش فرمائیں۔

PRINCIPAL
Govt: High School
Balakot (Mansehra)

Anx "D" ماہنامہ (12) 19 بخدمت جناب سول جج صاحب

B-2

B-2

مضمون ۱۔ جواب دعویٰ۔

53

جناب عالی

مودبانہ گزارش ہے کہ بسلسلہ دعویٰ سید ظاہر شاہ S/o سید بادشاہ سکنہ گرلوٹ بالاکوٹ (مدعی) بنام پرنسپل GHS بالاکوٹ (مسئول علیہ نمبر 2) چند معروضات آنجناب کے گوش گزار کرنے کی جسارت کرتا ہوں۔

۱۔ بقول مدعی، مدعی 1997ء میں GHS بالاکوٹ سے Ex-Pakistan Leave پر بیرون ملک گیا تو کیا مدعی نے مجاز اتھارٹی (سیکرٹری ایجوکیشن) سے منظوری لی اس سلسلہ میں دستاویزی ثبوت پیش کرے۔

۲۔ Ex Pakistan Leave کی منظوری کے بعد محکمہ سے تحریری طور پر NOC حاصل کی اس سلسلہ میں بھی دستاویزی ثبوت پیش کرے

۳۔ مدعی کا پاسپورٹ چیک کیا جائے آیا اس پر Govt Employee درج ہے

۔ مدعی کا یہ دعویٰ کہ وہ 1997ء میں GHS بالاکوٹ Ex Pakistan Leave پر بیرون ملک گیا غلط ہے کیونکہ شخصی شہادتوں اور دستیاب ریکارڈ سے پتہ چلتا ہے کہ 1990ء کے بعد مدعی کا کوئی سروس ریکارڈ موجود نہیں ہے گویا وہ 1990ء یا اس سے قبل ملازمت چھوڑ چکا تھا ثبوت کے طور پر اس کا پاسپورٹ / ویزا چیک کیا جائے

۵۔ مدعی کا دعویٰ ہے کہ اس نے 1997ء میں Leave حاصل کی اور 2000ء میں واپس پاکستان آکر بحالی سروس / حاضری کیلئے درخواست دی اور یہ کہ اسے بتایا گیا کہ 2005ء کے زلزلہ کے دوران اس کی سروس کا ریکارڈ ضائع ہو گیا ہے

52 تو مدعی سے پوچھا جائے کہ سنہ 2000ء تا سنہ 2005ء اور اب تک کل تیئس سال (23)
وہ کہاں تھا، کیوں خاموش رہا اور عدالتی چارہ جوئی سے کیوں دستبردار رہا۔
جبکہ اس عرصہ میں عدالتیں موجود تھیں

۶۔ مدعی نے یہ اقرار کیا ہے کہ اس نے منسٹرز / سیاستدانوں سے بھی سفارش کروائی
اگر وہ حق پر تھا تو سیاستدانوں کے پاس کیوں جاتا رہا عدالت سے کیوں رجوع
نہیں کیا۔

۷۔ جناب عالی:۔ اگر مدعی نے Ex Pakistan Leave کی ہائر اتھارٹی (سیکرٹری
ایجوکیشن) سے منظوری لی ہے تو پھر ضروری بات ہے کہ سروس بک بھی انہی
کے دفتر میں ہوگی کیونکہ مذکورہ چھٹی کے حصول کیلئے سروس بک کا ساتھ
پیش کرنا ضروری ہوتا ہے۔

۸۔ جناب عالی۔ یہ حقیقت ہے کہ اکتوبر سنہ 2005ء کے ہولناک زلزلے میں جہاں
تقریباً 150 بچے، تین اساتذہ کرام اور دو مندرجین درجہ چہارم
سکول میں دوران ڈیوٹی شہید ہوئے وہاں عمارت کے گرنے، عمارت کے
کچھ حصہ کو آگ لگنے اور بعد کی شدید بارشوں کی وجہ سے سکول
کا بیشتر ریکارڈ ضائع ہو گیا تاہم دستیاب ریکارڈ (جو لف ہے)
اور کلرک صاحبان اور بعض سینئر اساتذہ (جو کہ سنہ 1991ء سے تا حال سکول
میں تعینات ہیں) کی شہادتوں سے یہ بات واضح ہوتی ہے کہ مدعی یعنی
ظاہر شاہ ۹/۵ سید بادشاہ نام کا کوئی استاد سنہ 1990-91ء سے سکول ہذا
میں تعینات نہیں رہا۔ (شخص شہادتوں [illegible]

(13-4) (14) 59 | 17

51

جناب عالی۔ آخر میں، میں ملتمس ہوں کہ میں نے انچارج پرنسپل کی حیثیت سے سال اکتوبر 2012ء میں چارج سنبھالا اور انتہائی چھان بین اور تلاش کے باوجود سکول ہذا سے مدعی کی سروس یا اس طرح کا کوئی ریکارڈ مجھے دستیاب نہیں ہوا اور دستیاب ریکارڈ اور شخصی شہادتوں سے واضح طور پر پتہ چلتا ہے کہ مدعی یعنی ظاہر شاہ ولد سید بادشاہ نام کا کوئی استاد 1990 کے بعد سکول ہذا میں تعینات نہیں رہا۔

العبد پرنسپل GHS بالاکوٹ

PRINCIPAL
Govt: High School
Balakot (Mansehra)

گواہ نمبر ۱
محمد حسن ولد محمد مسکین (ٹیچر)

گواہ نمبر ۲
طاہر حسین ولد الف دین (ٹیچر)

Tahir

Attested

Ans "E"

ایم ظاہر شاہ × سی ٹی

گورنمنٹ ہائی سکول بالاکوٹ

10/58 (15)

50

آپ نے DEO مردانہ ضلع مانسہرہ کو ایک درخواست دی ہے جس میں آپ نے اپنی سروس کی بحالی کا مطالبہ کیا ہے جس پر DEO صاحب نے انکوائری کمیٹی مقرر کی ہے۔ آپ کو ہدایت کی جاتی ہے کہ آپ درج ذیل سوالات کے تحریری جوابات دیں۔

س ① آپ کی 1st تقرری کب ہوئی ہے؟

س ② کیا آپ کے پاس 1st Appointment کا آرڈر موجود ہے؟

س ③ آپ نے کون کون سے سکولوں میں سروس کی ہے؟

س ④ آپ کب سے Ex-Pakistan Leave پر بیرون ملک گئے ہیں؟

س ⑤ کیا آپ کے پاس مذکورہ چھٹی کی منظوری کا آرڈر ہے؟

س ⑥ آپ کب پاکستان واپس آئے ہیں؟

س ⑦ پاکستان آکر آپ نے دوبارہ سروس کی بحالی کے لیے محکمہ کو کوئی درخواست دی ہے؟ اگر دی ہے تو اس کا کوئی ثبوت آپ کے پاس ہے؟

س ⑧ آپ اپنا پاسپورٹ بطور ثبوت فراہم کریں؟

س ⑨ آپ کے مطابق چھٹی ایک دفعہ ختم ہونے پر دو بار Extend کرائی اس کا ریکارڈ بھی پیش کریں؟

س ⑩ اگر آپ کو محکمہ نے Adjust نہیں کیا تو اس طویل عرصے کے دوران آپ نے اپنی سروس کی بحالی کے لیے کوئی عدالتی کارروائی بھی کی ہے؟ اگر کی ہے تو ثبوت فراہم کریں؟

س ⑪ کیا اس دوران میں آپ کو محکمہ کی طرف سے کسی قسم کا غیر حاضری کا نوٹس وغیرہ ملا ہے یا نہیں؟

انکوائری کمیٹی

شہزادہ خان

عبدالماجد

7/2/15

(16) 15/57 49

ظاہر شاہ - سی ٹی ہائی سکول بالاکوٹ

(D)

جوابات سوالنامہ - انکوائری کمیشن

(1) 1ST تقرری 1983 سنہ

(2) جی ہاں 1st Appointment کا آرڈر میرے پاس موجود ہے -

(3) دو سکولوں میں - (1) گورنمنٹ ہائی سکول جوئی (2) گورنمنٹ ہائی سکول بالاکوٹ

(4) میں نے پہلی Ex-Pakistan چھٹی 1990 سنہ میں لی -

(5) جی ہاں مذکورہ چھٹی اور بعد میں ہونے والی Extention کی کاپیز میری ڈریلیکٹ سروس بک میں موجود تھیں جو کہ میرا گھر زمین بوس ہونے سے ضائع ہو گئیں -

(6) میں 2000 سنہ میں پاکستان واپس آیا تھا -

(7) پاکستان واپس آکر میں نے محکمہ کو ایڈجسٹمنٹ کیلئے متعدد درخواستیں دی جن کے ثبوت میرے پاس تھے - جن کا ریکارڈ 2005 سنہ کے زلزلہ میں ضائع ہوا -

(8) زلزلے میں بچے جانے والے ایک پاسپورٹ کی کاپی میرے پاس موجود ہے -

(9) چھٹی Extention کا مکمل ریکارڈ میری ڈریلیکٹ سروس بک میں موجود تھا جو زلزلہ کے دوران میرا گھر زمین بوس ہونے سے ضائع ہو چکی ہے -

(10) اس طویل عرصے کے دوران (ایڈجسٹمنٹ نہ ہونے کا پیریڈ) میں مسلسل عدالتوں کے چکر سالوں سے کاٹتا رہا جسکا ثبوت میرے پاس موجود ہے

(11) مجھے محکمہ کی طرف سے آج تک کوئی غیر حاضری کا نوٹس وغیرہ نہیں ملا اور نہ ہی کوئی شوکاز نوٹس وغیرہ ملا ہے -

Attested

07-02-2015

Anx 'F' (17)

14/8/48

(E)

میں مسمی شاہزمان (Peon) GHS بالاکوٹ 989

سے فرائض ادا کر رہا ہوں۔ سید ظاہر شاہ

ٹیچر GHS بالاکوٹ نے میری موجودگی میں

Ex.Pak. Leave کے سلسلہ میں اپنی سروس بک

وصول کی تھی اور پھر واپس نہیں کی۔

شاہزمان

Attested

PRINCIPAL
Govt: High School
Balakot (Mansehra)

Attested

(18) (8) Ann* G

15
56

47

جناب عالی!

میں مسمی محمد ساجد خان S.C.T 1992 سے
گورنمنٹ ہائی سکول بالاکوٹ میں تعینات ہوں
میرے ساتھ مسمی ظاہر شاہ EX-CT نے نہ ہی
سکول ہذا میں سروس کی ہے اور نہ ہی 1992 سے
آج تک میں نے مسمی ظاہر کو سکول ہذا میں
دیکھا ہے

ایم ساجد خان S.C.T

7/2/15

Attested

07/02/2015

PRINCIPAL
Govt: High School
Balakot (Mansehra)

Attested

J6377

ANNEXURE "a"

38

(19)

Rupees 30 ۳۰ روپیہ

Anx H

بیان حلفی بر یک قطعہ اسٹامپ مالیتی 30/- روپے

منکہ شاہزمان خان ولد ملک آمان خان قوم سمورتی ساکن پوڑی تحصیل بالاکوٹ ضلع مانسہرہ کا ہوں۔

حلفاً اقرار ہوں کہ ظاہر شاہ ولد سید بادشاہ ساکن گرلاٹ آف گورنمنٹ ہائی سکول بالاکوٹ کی سروس بک کا مجھے کوئی علم نہیں ہے کیونکہ میں کلاس فور ہوں یہ ہائی سکول بالاکوٹ کے متعلقہ کلرک کا کام ہے آپ متعلقہ بابو سے اسکی معلومات کر سکتے ہیں اس واقعہ کو کم و بیش کافی عرصہ ہو چکا ہے میں کلاس فور کی حد تک ہائی سکول بالاکوٹ کی گھنٹی بجانے تک محدود ہوں مجھے قطعی طور پر اس کا علم نہیں ہے اگر میں اس میں کسی قسم کی غلط بیانی کروں تو میں اس کا ذمہ دار ہوں۔

بیان حلفی ہذا درستی پر مبنی ہے کوئی امر مخفی / محبوب نہیں رکھا گیا

لہذا بیان حلفی سنداً تحریر ہے۔ راقم 18/12/2015 بالاکوٹ

شاہزمان خان ولد ملک آمان خان مکلف مذکور

13501-1292938

18/12/2015

تیمور خداداد ولد خدا محمد سکنہ بلیانی کفیل بالاکوٹ 13501-3723923-1

نیاز محمد
نائب نویس بالاکوٹ
18/12/2015

FIR
Regarding
Service

3770
18-7-15

یک قطعه رشته سپ ماسی 30/- روپیه بدست شاه زمان خان در ملک آمان خان ساکن پوزی تحصیل بابرکوت ضلع مانسهره

13501-1292938-7

(بیان حلفی)

Muhammad Hamid
D.A.O Mansehra
Head Treasurer

Annexure (I) (20)

2730 05/5/15

Support 22 for Immediate 64 86

The District Education Officer,
(Male) Mansehra.

Subject: INQUIRY REPORT IN I/R OF MR. ZAHIR SHAH EX.CT GHS BALAKOT

Memo:

In response to your letter No. 1475-76 dated 29-01-2015.

BACKGROUND:

The inquiry committee informed to I/C GHS Balakot and Mr. Zahir Shah Ex. CT through telephonic message and fixed date and time for conduct of inquiry i-e 7-02-2015 at GHS Balakot.

Mr Wajid Ali I/C of the school was served a questionnaire (copy of questionnaire) and his reply are attached as annex A&B 1 --- B4.

A questioner was also served to Mr. Zahir Shah Ex. CT (copy of questionnaire and his reply are attached as annex C&D). According to his statement he served at GHS Balakot up to 1990 and after that he got Ex -Pakistan Leave and went to abroad. He further stated that his duplicate service book & sanction of EX- Pakistan leave record have destroyed in the Earth Quake-2005. He also declared that he applied several times for adjustment but department neither adjusted nor terminated him till now.

FACTS:

Mr. Shah Zaman peon of GHS Balakot submitted a written statement. According to his statement Mr. Zahir Shah Ex. CT received his service book from concern clerk in his presence and did not return to the clerk of the school. The said written statement is attached as annex "E".

Mr Muhammad Sajid SCT of GHS Balakot also submitted a written Statement. According to his statement he has been serving at GHS Balakot since 1992 but he did not see MR. Zahir Shah Ex.CT in this Institution. The Said written statement is attached as annex" F".

FINDINGS

According to School record and written statements of different concerns of the institution, Mr. Zahir Shah Ex. CT did not serve at GHS Balakot after 1990.

Besides, Mr. Zahir Shah Ex. CT could not provide the record of his application for adjustment and sanction of Ex Pakistan leave.

RECOMMENDATIONS.

In the light of school record and written statements of different concerns of the institution, The inquiry committee is of the view that Mr. Zahir Shah Ex. CT does not deserve to re-instate in service after gap of 25 years.

COMMITTEE

- Shahzada Khan Principal GHS No.3 Mansehra. 30/4/2015
- Abdul Majid Vice Principal GHSS N0.1 Mansehra. 30/4/2015

Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Subject: ENQUIRY REPORT IN R/O MR. ZAHIR SHAH EX-CT GHS BALAKOT.

Memo:

Annex I

Reference to your office notification No 6400-01 dated 10/04/2018, the requisite enquiry report is submitted as under:

INTRODUCTION AND BACKGROUND

An application received from one MR. Zahir Shah Ex-CT GHS Balakot Mansehra in the office of DEO (M) Mansehra on 24/01/2015 and DEO (M) Mansehra constituted an enquiry committee comprising of Mr. Shahzada Khan Principal GCMS No 3 Mansehra and Mr. Abdul Majid Vice Principal GHSS NO 1 Mansehra vide notification No 1475-76 dated 29/01/2015 for fact finding in the matter. This enquiry committee submitted its report on 30/04/2015 wherein it is recommended that applicant does not deserve to be reinstated in service after a gap of 25 years.

As the applicant claimed during the inquiry that he has never been proceeded against nor issued any termination order against his appointment order and transfer order presented to the committee. Departmental proceeding was started and he was issued charge sheet / statement of allegation vide DEO (M) Mansehra No 7854-57 dated 01/06/2015, wherein an enquiry committee was constituted for formal enquiry under E&D Rules 2011. Meanwhile the applicant preferred a service appeal in NWFP/KP Service Tribunal bearing No 528/2014 with date of institution 28/03/2014. (Annexure 1)

Therefore in pursuance to sub rule 2 of rule 19 of KP Government (E&D) Rules 2011 the proceeding was kept pending / whitheld on receipt of notice from the court and it remained pending till the disposal of appeal on 17/01/2018 received in the DEO(M) office on 06/02/2018 wherein a direction was given to the department to decide the pending appeal of appellant well as the departmental proceeding mentioned above within the ninety days of receipt of this judgment / order.

Hence this enquiry committee was constituted vide DEO (M) Mansehra notification No 6400-1 / Estab (M) Dated 10/04/2018 for formal enquiry in the matter as per requirement of E&D Rules 2011.

PROBE / ENQUIRY.

All available record in the office of DEO (M) Mansehra, GHS Balakot was perused besides the findings and proceedings of enquiry committee already constituted for fact finding and personal evidences of concerned official of the period, he claimed to be posted at GHS Balakot, was also taken into account.

The applicant Mr. Zahir Shah was heard in person. His documentary proof were also considered and he was given an opportunity of cross examination in the presence of departmental representative.

FINDINGS.

After going through the above mentioned record, reports and evidence the committee comes to the conclusion that;

1. Mr. Zahir Shah claimed to be appointed as CT at GHS Balakot vide Divisional Director Order No 94 Dated 13/10/1983 and has been transferred to GHS Balakot vide No 170 CT(M) Dated 27/08/1983 except these two office orders nothing is available as a proof of his service matter in the school office nor with applicant himself. These office orders too, are not verifiable at this stage as these were pertaining to defunct Divisional Directorate, Hazara Division. **The transfer order to GHS Balakot bearing date 27/08/1983 while his appointment order bears date of 13/10/1983. How can transfer be possible before his appointment? Therefore, these orders are bogus. (Annexure 2, pages No 8-10)**
2. in reply to the questionnaire he says that he went abroad in 1997 and returned back in 2000, but in earlier enquiry he told that he first applied for Ex-Pakistan leave in 1990 and got further extension in Ex-Pakistan leave; the proofs thereof were attached with duplicate service book

Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

which were lost in 2005 earth quack; this misstatement also leads to the conclusion that he had never served in the said school in the period he claimed for. (**Annexure 3**)

3. There is no evidence of his service in this department either documentary or personal. He failed to furnish the sanction of Ex-Pakistan leave and extension thereof, his service book, pay slip, acquaintance roll or even personnel No or GP fund NO issued by District Account Office.
4. He claimed to approach his Department / School after expiry of Ex-Pakistan leave in the year 2000 but there is no documentary proof with him or in the office except his application/ complaint No 168 received through Assistant Registrar RTI commission KPK Peshawar vide his NO: RTI/IC/1023/14/91/ Dated 23/10/2014 and his departmental appeal to the DEO (M) Mansehra on 24/01/2015 which, were duly responded by department.
5. As regard issuance of formal order of termination by the competent authority, his service in the Department in not yet acknowledged / accepted.
6. Record provided by Principal GHS Balakot vide letter No 316 dated 13/012/2014 to DEO (M) in response to his letter No 13779 dated 24/11/2014 includes EEF list for year 1995, Acquaintance Roll pay bill of 1996 and Acquaintance Roll of 2000, all these documents show that he had not served in the school as his name is not listed as teacher in these documents. (**Anx 4**).

RECOMMENDATION.

In the light of finding narrated above the enquiry committee for formal enquiry in hand endorse the recommendation of fact finding enquiry that;

1. Mr. Zahir Shah E-CT does not deserve to be re-instated in service after gap of 25 years.
2. His subject departmental appeal may be rejected.

26/04/2018

1. Muhammad Naseem Khan Principal GHSS Behali (Chairman) _____
2. Babur Basir Khan SDEO (M) Mansehra (Member) _____

26/4/18

Anx (K)

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18

OF THE HEADMASTER GOVERNMENT HIGH SCHOOL BALAKOT MANSHRA.
E OF GENERAL PROVIDENT DEDUCTION FOR THE MONTH OF OCTOBER 1992.

	Name of Subscribers &	Pay	Rate	Refund	Total	Instt:-
.A	Umer Z eb	3189/-	150/-	-	150/-	-
HA	Mohammad Farooq	2244/-	140/-	50/-	190/-	
/HA	Ghulam Rabbani	2482/-	140/-	-	140/-	
/M.A	Mohammad Anwer	2751/-	175/-	-	175/-	
/H-A	Ghulam Hussain	1755/-	55/-	-	55/-	
0/ H-A	Mohammad Bashir	1284/-	25/-	-	25/-	
376/H-A	Gul Zaman	1284/-	25/-	100/-	125/-	
2437/H-A	Mohammad Shafiq	3043/-	175/-	200/-	375/-	
1752/H-A	Shafiqur Rehman	3189/-	175/-	-	175/-	
2129/H-A	Shah Nawaz	2193/-	60/-	-	60/-	
877/M-A	Mohammad Ayyub	1202/-	25/-	-	25/-	
878/M-A	Ghulam Jilani	1206/-	25/-	-	25/-	
879 /M-A	Shah Zaman	1232/-	25/-	-	25/-	
880/M-A	Abdul Aziz	1206/-	-25/-	-	-25 /-	
1000/M.A	Mohd Tufail	1768/-	140/-	50/-	190/-	
2632/M.A	Mohammad Javed	1768/-	140/-	-	140/-	
2631/M.A	Rehmat Ullah	1635/-	50/-	100/-	150/-	
063 /M-A	Abdullah Jan	1206/-	25/-	-	25/-	
4104/MA	Imtiaz Ahmad	1768/-	140/-	-	140/-	
2044/M-A	Abdul Waheed	1769/-	140/-	-	140/-	
1844/M-A	Rafaqat Ali	1400/-	60/-	-	60/-	
4461/M-A	Ashfaq Ahmad	1875/-	~~150~~/ 175/-	100/-	~~275~~/- 275/-	
2705 /M-A	Ashfaq	1689/-	60/-	-	60/-	
1242 /M-A	Abdul Wahab	2121/-	60/-	~~50~~/- 50/-	~~60~~/- 110/-	
4174/ M.A	Mohd Bashir	1050/-	25/-	-	25/-	
2708/ M-A	Nazir Hussain	1617/-	60/-	-	60/-	
4118/ M-A	Abdus Saboor	1716/-	60/-	-	60/-	
1713/M-A	Naseer Hussain Sha	1617/-	60/-	-	60/-	
7043/M-A	Shoukat Iqbal	920/-	25/-	-	25/-	
20950/H-A	Fazl-ur-Rehman	2315/-	75/-	-	75/-	
	Total:-		2515/-	650/-	3165-00 ~~3165~~/=	

23

2515/=

Headmaster
Government High School
Balakot.

20.10.92./

2515
650
3165/-

Anx L (24) 2-17

OFFICE OF THE PRINCIPAL GOVT. HIGH SCHOOL BALAKOT (MANSEHRA).
SCHEDULE OF (3336) (3337) & (331110) E.F.F FOR THE MONTH of 4/95.

S.No.	Name.		(3336)	(3337)	(331110)	One day Pay.
1.	Shafiqur Rehman	SET	40/-	9/37	07/-	-
2.	Muhd: Arif.	SET	40/-	9/37	07/-	-
3.	Muhd: Anwar	SET	40/-	9/37	07/-	-
4.	Muhd: Shafique	SET	40/-	9/37	07/-	-
5.	Ashfaq Ahmed.	SET	40/-	9/37	07/-	-
6.	Umar Zeb.	DM	10/-	1/57	05/-	-
7.	Muhd: Farooq	CT	10/-	1/57	0 5/-	-
8.	Muhd: Tufail	CT	10/-	1/57	05/-	-
9.	Muhd: Javid.	CT	10/-	1/57	05/-	-
10.	Niaz Muhd:	CT	10/-	1/57	05/-	-
11.	Muhd: Sajjid.	SV	10/-	1/57	05/-	-
12.	Ghulam Rahbani	SV	10/-	1/57	05/-	-
13.	Fazalur Rehman	SV	10/-	1/57	05/-	-
14.	Muhd: Ashfaq.	CT	10/-	1/57	03/-	-
15.	Khurshid Akhtar	CT	10/-	1/57	03/-	57/-
16.	Afra Siab.	CT	10/-	1/57	03/-	-
17.	Nazeer Hussain.	SV	10/-	1/57	03/-	-
18.	Abdul Saboor	SV	10/-	1/57	03/-	-
19.	Abdul Wahab.	OT	10/-	1/57	03/-	-
20.	Shah Nawaz	PET	10/-	1/57	03/-	-
21.	Nasir Hussain	DM	10/-	1/57	03/-	-
22.	Abdul Akhad.	TT	10/-	1/57	03/-	55/-
23.	Sher Zaman	TT	10/-	1/57	03/-	-
24.	Mushtaq Feroz.	JC	10/-	1/57	03/-	55/-
25.	Muhd: Bashir.	SW:	10/-	-	02/-	-
26.	Shah Zaman	NQ	10/-	-	02/-	-
27.	Abdullah Jan	BR:	10/-	-	02/-	-
28.	Ghulam Jilani	SW:	10/-	-	02/-	-
29.	Abdul Aziz.	Mali	10/-	-	02/-	-
30.	Muhd:Ayub.	WG:	10/-	-	02/-	-
31.	Shaukat Iqbal	Ch:	10/-	-	02/-	47/-
32.	Amjid Ali	L/A	10/-	-	02/-	43/-
TOTAL:-			470/-	76/68	124/-	257/-

Mushtaq Feroz.

Countersigned
Principal
GOVT. HIGH SCHOOL
Hassa Mansehra

PRINCIPAL
GOVT. HIGH SCHOOL
BALAKOT.

.....x.....

Govt. High School Balakot

Detailed Pay Bill for ... 01201-

Cheque No. ... G.O. ... Code Audit No. ...

Senior Accountant ... Auditor ... Grant No. 018 ... Auditor ... 7/11/56

Name of Section and of Incumbent	Name of post	Basic Pay of Other Staff	House Rent Allowance	Conveyance Allowance	Local Compensatory Allowance	Special Allowance	Special Allowance	Special Duty Allowance	Other Regular Allowances (e.g. Hill Allowance)	Total	Overtime Allowance	Night Duty Allowance	Honorarium	Medical Charges	Rose and Recreation Allowance	Leave Salary Contribution	Total	Total Establishment Charges	General Provident Fund	Provident Fund Advances to Government Servants (Form 152)	Contributory Pension
		(012)	(022)	(023)	(026)	(027)	(025)	(028)	(029)	(030)	(031)	(032)	(033)	(034)	(035)	(038)	(036)	(039)	(1302)	(1303)	
B-16. 2535-197-5490																					
1. Shafiqur Rehman	SET	5096/-	562/50	90/-	356/-				6104/50	325/-	1000/-	40/-	9/37	7/-	103/-	XXXXXX	1484/37		4620/13		
2. Muhd: Arif	SET	4809/-	562/50	90/-	342/-				5893/50	325/-	[illegible]	40/-	9/37	7/-	83/-	XXXXXX	1464/37		4429/13		
3. Muhd: Anwar	SET	4702/-	562/50	90/-	329/-				5683/50	325/-	-	40/-	9/37	7/-	63/-	XXXXXX	444/37		5239/13		
4. Muhd: Shafiq	SET	4702/-	562/50	90/-	329/-				5683/50	325/-	-	40/-	9/37	7/-	63/-	XXXXXX	444/37		5239/13		
5. Muhd: Mushtaq	SET	3323/-	562/50	90/-	233/-				4208/50	325/-	-	40/-	9/37	7/-	-	XXXXXX	381/37		3827/13		
6. Ishfaq Ahmed	SET	2929/-	562/50	90/-	205/-	200/-			3986/50	325/-	[illegible]	40/-	9/37	7/-	-	XXXXXX	381/37		3605/13		
B-15. 2190-177-4845.																					
7. Umar Zeb Khan	DM	4668/-	486/-	90/-	326/-				5570/-	285/-	-	10/-	1/57	5/-	59/-	958/-	1318/57		4251/43		
B-14. 2065-161-4480.																					
8. Muhd: Tufail	CT	3031/-	459/-	90/-	212/-				3792/-	265/-	-	10/-	1/57	5/-	-	-	281/57		3510/43		
9. Muhd: Javaid	CT	3031/-	459/-	90/-	212/-				3792/-	265/-	-	10/-	1/57	5/-	-	-	281/57		3510/43		
10. Muhd: Sajjid	CT	3031/-	459/-	90/-	212/-				3792/-	265/-	-	10/-	1/57	5/-	-	-	281/57		3510/43		
11. Shafiqur Rehman	DM	2387/-	459/-	90/-	167/-				3103/-	265/-	-	10/-	1/57	5/-	-	-	281/57		2821/43		
12. Khalid Mehmood	CT	2226/-	459/-	90/-	156/-				2930/-	265/-	-	10/-	1/57	5/-	-	-	281/57		2648/43		
13. Niaz Muhammad	CT	2709/-	459/-	90/-	189/-				3447/-	265/-	-	10/-	1/57	5/-	-	-	281/57		3165/43		
14. Mashkoor Hussain	CT	2226/-	459/-	90/-	156/-				2930/-	265/-	-	10/-	1/57	5/-	-	-	281/57		2648/43		
15. Khurshid Akhtar	CT	2065/-	459/-	90/-	144/-				2759/-	265/-	-	10/-	1/57	5/-	-	-	281/57		2477/43		
B-12. 1830-130-3780.																					
16. Fazalur Rehman	OT	3780/-	406/50	90/-	264/-				4540/50	145/-	-	10/-	1/57	5/-	-	-	XXXXXX 161/57		4378/93		
17. Shah Nawaz	PET	3650/-	406/50	90/-	254/-				4401/50	145/-	-	10/-	1/57	XXXXX	-	690/-	841/57		3559/93		
B-9. 1625-97-3060.																					
18. Muhd: Ishtiaq	CT	2672/-	355/50	90/-	186/-				3304/50	120/-	225/-	10/-	1/57	3/-	-	-	559/57		2744/93		
19. Nazir Hussain	CT	2575/-	355/50	90/-	180/-				3200/50	120/-	500/-	10/-	1/57	3/-	-	-	634/57		2565/93		
20. Abdul Saboor	SV	2478/-	355/50	90/-	173/-				3096/50	120/-	-	10/-	1/57	3/-	-	-	134/57		2961/93		
21. Abdul Wahab	OT	3265/-	355/50	90/-	228/-				3938/50	120/-	50/-	10/-	1/57	9/-	XXXX	419/-	603/57		3334/93		
22. Abdul Saboor	CT	1605/-	355/50	90/-	112/-				2162/50	120/-	-	10/-	1/57	3/-	-	-	134/57		2027/93		
B-7. 1480-81-2695.																					
23. Faiz Ahmed	TT	2452/-	328/50	90/-	171/-				3042/50	100/-	-	10/-	1/57	3/-	-	-	114/57		2927/93		
24. Sher Zaman	TT	2209/-	328/50	90/-	154/-				2781/50	100/-	200/-	10/-	1/57	3/-	-	-	314/57		2466/93		
B-5. 1400-66-2390.																					
25. Syed Ejaz H. Shah	Jr/C	1862/-	310/50	90/-	130/-				2392/50	95/-	-	10/-	1/57	3/-	-	-	109/57		2282/93		
B-2. 1275-44-1935.																					
26. Muhd: Bashir	SW	1891/-	276/-	90/-	132/-			30/-	35/-	2454/-	85/-	-	10/-	-	2/-	-	97/-		2357/-		
27. Shah Zaman	NQ	1803/-	276/-	90/-	126/-			30/-	40/-	2365/-	85/-	-	10/-	-	2/-	-	97/-		2268/-		
28. Muhd: Ayyub	WC	1803/-	276/-	90/-	126/-			30/-	35/-	2360/-	85/-	-	10/-	-	2/-	-	97/-		2263/-		
B-1. 1245-35-1770.																					
29. Abdullah Jan	BR	1770/-	276/-	90/-	123/-				2259/-	50/-	-	10/-	-	2/-	-	-	62/-		2197/-		
30. Ghulam Jilani	SW	1770/-	276/-	90/-	123/-			30/-	35/-	2324/-	50/-	200/-	10/-	-	2/-	-	262/-		2062/-		
31. Abdul Aziz	Mali	1770/-	276/-	90/-	123/-			30/-	35/-	2324/-	50/-	-	10/-	-	2/-	-	62/-		2262/-		
32. Rehmat Din	Chow.	1665/-	276/-	90/-	116/-			30/-	35/-	2212/-	50/-	-	10/-	-	2/-	-	62/-		2150/-		
33. Amjid Ali	L/Att.	1315/-	276/-	90/-						1773/-	50/-	-	10/-	-	2/-	-	62/-		1711/-		
34. Badiuzaman	Cook	1280/-	276/-	90/-						1735/-	50/-	-	10/-	-	2/-	-	62/-		1671/-		
		92640/-	13575/-	3060/-	6472/-	200/-	100/-	215/-	116342/-	6095/-	2175/-	520/-	86/05	XXXX/- 139/-	371/-	2057/-	11443/05		104898/95		

CERTIFICATE:- Certified that the off[illegible] Class VI [illegible] noted above in this bill has not been provided any accomodation by the Govt.

(3) جرا میلیم -

آپ کی عدالت عالیہ میں عرض کرتا ہوں کہ میں نے جب اس سکول

PAKISTAN AUDIT DEPARTMENT
COMPUTER WING
DEPARTMENT: 41400-00 SECONDARY EDUCTION
D.D.O. : 04149
SUB-D.D.O : 000-
PRIN: G.H.S BALAKOT MANSEHRA

D.A.O MANSEHRA
PAYMENT LIST
FOR THE MONTH OF MARCH , 2000 NON-GAZ

REPORT: PAYR04
DATE: 28/03/2000
PAGE : 110

SECTION : PAYROLL 01

IDCARD NUMBER	NAME	DESIG	NET AMOUNT	SIGNATURE OF EMPLOYEE
123 86 091503	ATTIQ UR REHMAN	ARABIC TEACHER	4,733.43	
123 49 434112	ABDULLAH JAN	BARA	2,851.43	
123 48 920087	MUHAMMAD ISHAQ	CLASSICAL TEACHER (C	5,781.43	
123 62 253430	NIAZ MUHAMMAD	CLASSICAL TEACHER (C	4,261.43	
123 64 005812	SHAKIL AHMED	CLASSICAL TEACHER (C	4,588.43	
123 65 524177	MUHAMMAD AMJAD AWAN	CLASSICAL TEACHER (C	4,761.43	
123 85 355469	SAEED AHMED	CLASSICAL TEACHER (C	4,605.43	
123 85 413083	MUHAMMAD TAHIR	CLASSICAL TEACHER (C	4,405.43	
123 85 466351	MUHAMMAD SAJID	CLASSICAL TEACHER (C	4,605.43	
123 88 233833	KHALID MEHMOOD	CLASSICAL TEACHER (C	4,244.43	
123 90 325657	RIAZ AHMAD	CLASSICAL TEACHER (C	4,072.43	
123 92 062962	NAZIR HUSSAIN	CLASSICAL TEACHER (C	3,771.93	
123 92 181877	WARIS MAHMOOD	CLASSICAL TEACHER (C	3,899.43	
213 89 008720	WAQAAR AHMAD	CLASSICAL TEACHER (C	3,899.43	
123 89 016260	BADIUZAMAN	COOK	2,527.43	
123 43 002342	UMAR ZEB KHAN	DRAWING MASTER	5,731.63	
123 88 076420	SHAFIQ UR REHMAN	DRAWING MASTER	4,416.43	
123 87 121197	SYED EJAZ HUSSAIN SHAH	JUNIOR CLERK	3,355.93	
123 87 466360	AMJAD ALI	LABORATORY ATTENDANT	2,565.43	
123 56 209166	ABDUL AZIZ	MALI	3,116.43	
123 49 176937	SHAH ZAMAN	NAIB QASID	3,177.93	
123 49 509030	MUHAMMAD-ULLAH	NAIB QASID	2,939.93	
123 54 523980	MUHAMMAD YAQUB	ORIENTAL TEACHER (O	4,075.93	
123 86 092614	IHSAN UL HAQ KHAN LUGHMANI	PHYSICAL EDUCATION T	4,244.43	
123 90 066686	MUHAMMAD RAFIQ	QARI	3,860.93	
123 62 577605	GHULAM JILLANI	SWEEPER	2,616.43	
123 92 793057	MUHAMMAD BANARAS	SWEEPER	2,448.43	
123 48 001562	GHULAM HUSSAIN	THEOLOGY TEACHER (T	4,244.93	
123 69 390910	MUHAMMAD KHUSHAL	THEOLOGY TEACHER (T	2,840.93	
123 39 182095	MUHAMMAD AYUB	WATER CARRIER	3,165.43	

CASHLOC TOTAL: 115,810.10

Pr. t ctt 1/2000
124,773/96

Cop
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(27) Annex N'

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT MANSEHRA
Phone # 0997-382271 **Fax # 0997-382244**
E-mail Address: edoedu_mansehra@yahoo.com
Facebook Page: www.facebook.com/DEOMMANSEHRA

NOTIFICATION

I, Zaffar Arbab District Education Officer (Male) Mansehra as competent Authority for deciding an appeal which was entrusted to me by Honorable Khyber Pakhtunkhawa Service Tribunal camp court Abbottabad, vide judgment dated 17-01-2018 and received on 06-02-2018 in appeal No. 528/14 title Zahir Shah Vs Govt of Khyber Pakhtunkhawa, whereupon the appeal of the appellant is converted into Departmental Appeal.

1. WHEREAS an inquiry committee was constituted for the purpose to probe into the matter vide this office No. 6400-01 dated 04-10-2018.

2. WHEREAS inquiry committee submitted his report along with recommendations that: -
   Mr. Zahir Shah Ex-CT does not deserve be reinstated in to service after gap of 25 years.

3. AND WHEREAS the competent authority District Education Officer (M) E&SE Mansehra after having considered the report of the inquiry committee, available relevant record/documents, is of the view that the submission an appeal before Honorable Khyber Pakhtunkhwa Service Tribunal camp court Abbottabad, could not be considered for any relief.

NOW, THEREFORE, in exercise of the powers conferred under Section 21 of General Clauses Act, 1897, the departmental appeal is hereby rejected.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHR

Endst: No. 7494-98 /Estt:(M)/ /Dated 02/5 /2018

Copy forwarded for information to the:

1. Registrar Honorable Khyber Pakhtunkhawa Service Tribunal Peshawar with reference to his 233/ST dated 30-01-2018.
2. Secretary Govt: of Khyber Pakhtunkhawa Elementary & Secondary Department Peshawar.
3. Director E&SE Khyber Pakhtunkhwa Peshawar.
4. Principal GHS Balakot Mansehra.
5. Zahir Shah R/O Village Mohar Tehsil & District Mansehra.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

04 set on legal page 2