

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1504/2018

Date of institution 11.12.2018

Mst. Nazma Ali, Certified Teacher (BPS-15), GGMS Rajjar, District Charsadda.

VERSUS

The Director of E&SE Department, Khyber Pakhtunkhwa, Peshawar and two others.

ORDER
11.11.2021

Mr. Muhammad Maaz Madni, Advocate, for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Learned counsel for the appellant stated at the bar that the instant appeal has been filed for release of salary of the appellant but during the pendency of the instant appeal, removal order of the appellant has been passed, therefore, he wants to withdraw the instant appeal being infructuous. In this respect, he submitted written application, which is placed on file.

In view of the above, the appeal in hand stands dismissed as withdrawn being infructuous. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
11.11.2021



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



(Salah-Ud-Din)
Member (Judicial)

KP Service Tribunal, Peshawar.

Service Appeal # 1504/2018.

Nazma Ali v/s Edu: Deptt.

Application for withdrawal of the
above appeal being infructuous.

Respectfully Sheweth;

- 1) That the above titled appeal was filed for release of salary
- 2) That after submission & during pendency of the above service appeal removal order was issued which was also challenged and is fixed for hearing today on 11/11/2021
- 3) That appellant intends to withdraw the above titled appeal being infructuous.

It is therefore most humbly prayed that the above titled appeal be withdrawn, please

11/11/2021

Appellant
Enough.


& Umar Farooq
M. Maaz Mahmood

08.10.2021

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

Since counsel for the appellant in connected appeals is not available, therefore, the appeal at hands is also adjourned. To come up for arguments on 11.11.2021 before the D.B.

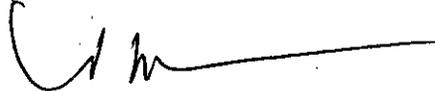

(Mian Muhammad)
Member(Executive)


Chairman

13.11.2020

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

The Bar is observing general strike, therefore, the matter is adjourned to 28.01.2021 for hearing before the D.B.


(Atiqur Rahman Wazir)
Member


Chairman

28.01.2021

Due to pandemic of Covid-19, the case is adjourned to 15.04.2021 for the same.


Reader

15.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 03.08.2021 for the same as before.


Reader

03.08.2021

Counsel for the appellant present.

Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment as connected service appeal of the appellant is pending before this Tribunal and is fixed for arguments on 08.10.2021 before D.B. Request is acceded and the present service appeal is adjourned to 08.10.2021 for arguments before D.B.


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


(Rozina Rehman)
Member (J)

12.05.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 22.06.2020 before D.B.



Reader

22.06.2020

Due to public holiday on account of COVID-19 the case is adjourned for the same on 09.09.2020 before D.B.



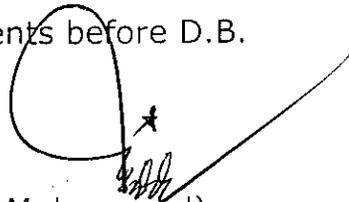
Reader

09.09.2020

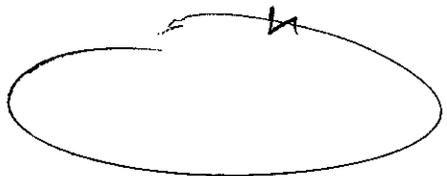
Mr. Afrasyab Wazir, Advocate for the appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

The perusal of record reveals that the case was fixed for submission of rejoinder and arguments but rejoinder has not been submitted so far and the learned counsel is seeking time for submission of rejoinder. Time is allowed with the direction to submit rejoinder well before the next date.

According to the learned counsel his senior namely Noor Muhammad Khattak is busy in the Hon'ble Peshawar High Court, Peshawar. He is seeking adjournment. The appeal is adjourned to 13.11.2020. File to come up for arguments before D.B.



(Mian Muhammad)
Member (Executive)



(Muhammad Jamal Khan)
Member (Judicial)

29.08.2019 Junior to counsel for the appellant present. Addl: AG alongwith Mr. Irfanullah, Assistant and Mr. Zakiullah, Senior Auditor for respondents present. Written reply on behalf of respondents not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 26.09.2019 before S.B.


(Ahmad Hassan)
Member

26.09.2019 Counsel for the appellant present. Addl: AG alongwith Mr. Mr. Mudassir Shah, ADEO and Mr. Tayab, ADO for respondents present. Written reply submitted which is placed on file. To come up for rejoinder and arguments on 11.12.2019 before D.B.


Member

11.12.2019 Lawyers are on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for further proceedings/arguments on 29.01.2020 before D.B.,


Member


Member

29.01.2020 Junior to counsel for appellant and Addl. AG for the respondents present.

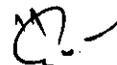
Former requests for adjournment due to general strike of the Bar. Adjourned to 31.03.2020 for arguments before the D.B.


Member


Member

16.04.2019

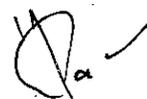
Junior to counsel for the appellant present. Written reply not submitted. Hayat AD representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 22.05.2019 before S.B.



Member

22.05.2019

Husband of the appellant on behalf of appellant present. Written reply not submitted. Private respondent No.3 in person present and seeks time to furnish reply. Hayat AD (for respondent No.1) and Mudassir Litigation Officer (for respondent No.2) absent. Official respondents i.e. respondents No.1 & 2 as well as the absent representatives be put to notice with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 03.07.2019 before S.B.



Member

03.07.2019

Learned counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Written ^{reply} not submitted. Representative of the respondents No. 1 to 3 is not in attendance nor submitted their written reply/comments, therefore, notice be issued to the representative of the respondents department for attendance and submitted their written reply/comments on the next date positively. Adjourned. To come up written reply/comments on 29.08.2019 before S.B.



Member

08.03.2019

Counsel for the appellant Mst. Nazma Ali present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Certified Teacher vide order dated 28.01.2011. It was further contended that the appellant was serving in Government Girls Middle School Rajjar, District Charsadda. It was further contended that on 27.02.2013, the appellant submitted application to the competent authority for her transfer to her own district and accordingly application was accepted and she was transferred vide order dated 01.03.2013 to Government Girls High School Shabqaddar District Charsadda. It was further contended that the appellant was receiving salary till September 2017 and learned counsel for the appellant also filed copy of pay slip in this respect but after September 2017 the respondent-department has stopped the salary of the appellant without any reason therefore, the appellant filed departmental appeal on 28.08.2018 but the same was not responded hence, the present service appeal. It was further contended that the respondent-department has stopped the salary of the appellant without any reason therefore, the respondent department is bound to release the salary of the appellant.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 16.04.2019 before S.B.


Appellant Deposited
Security & Process Fee

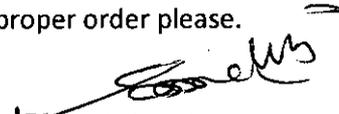


(Muhammad Amin Khan Kundi)
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1504/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/12/2018	<p>The appeal of Mst. Nazma Ali resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	24/12/2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21/01/2019</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
21.01.2019		<p>Husband of the appellant present and seeks adjournment as Learned counsel for the appellant is not available. Adjourn. To come up for preliminary hearing on 15.02.2019 before S.B.</p> <p style="text-align: right;"> Member</p>
15.02.2019		<p>Husband of appellant alongwith learned counsel for the appellant present. Learned counsel for the appellant seeks adjournment to furnish last salary slip of the appellant. Adjourn. To come up for preliminary hearing on 08.03.2019 before S.B.</p> <p style="text-align: right;"> Member</p>

The appeal of Mst. Nazma Ali C.T GGMS Rajjar Distt. Charsadda received today i.e. on 11.12.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of impugned order and departmental appeal against it are not attached with the appeal which may be placed on it.

No. 2379 /S.T,

Dt. 12-12-2018.


REGISTRAR 12/12/18
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M.Noor Muhammad Khattak Adv. Pesh.

Note.

That objection No.1 has been removed the objection No.2 Departmental appeal for the release of salaries is attached as annexure-M on page No.34 and ^{no} such impugned order has been passed. The instant appeal filed just for the release of salaries, hence re-submitted today dated 19/12/2018.

19/12/2018

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 1504 /2018

NAZMA ALI

VS

E&SE DEPARTMENT

INDEX

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5	Transfer order	D	16.
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7	Transfer order dt: 1.3.2013	F	19.
8	Relieving order	G	20.
9	Charge report	H	21- 22.
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11	Verification letters	J	24- 29.
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15	Vakalat nama	35.

APPELLANT

THROUGH:

**NOOR MOHAMMAD KHATTAK,
ADVOCATE**

ROOM NO. 1, UPPER FLOOR,
NEW ISLAMIA CLUB BUILDING,
KHYBER BAZAR, PESHAWAR CITY

0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

APPEAL NO. 1504 /2018

Diary No. 1743

Dated 11/12/2018

Mst: Nazma Ali, Certified Teacher (BPS-15),
GGMS Rajjar, District Charsadda..... **APPELLANT**

VERSUS

- 1- The Director of E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer (F), District Charsadda.
- 3- The District Accounts Officer, District Charsadda.

..... **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT RELEASING MONTHLY SALARIES OF THE APPELLANT W.E.F. 1.8.2011 TILL AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

Conceded

PRAYER:

That on acceptance of this appeal the respondents may be directed to release the monthly salaries of the appellant w.e.f. 1.8.2011 till date. Any remedy which this august Court deems fit may also be awarded in favor of appellant.

Filed to-day
Registrar
11/12/18

Conceded

R/SHEWETH:
ON FACTS:

1- That appellant was appointed as C.T (BPS-15) in the respondent Department on the proper recommendation of Departmental selection committee vide Notification dated 28.1.2011. Copies of the Educational testimonials, appointment order and service book are attached as annexure **A, B & C.**

2- That during service the appellant was transferred from GGHS Banian Battagram to GGMS Shamlai, District Battagram vide office order dated 31.1.2011. Copy of the order is attached as annexure **D.**

3- That during service at District Battagram the appellant submitted an application for her transfer to her home District i.e. District Charsadda. That the said application of the appellant was accepted by the respondent No.1 and

Re-submitted to -day
and filed.
Registrar
11/12/18

resultantly the appellant was transferred to GGHS Shabqadar Fort, District Charsadda vide order dated 1.3.2013. Copies of the application, domicile and order are attached as annexure **E and F.**

- 4- That in light of the said order dated 1.3.2013 the appellant was relieved from GGHS Banian, Battagram and as such the appellant submitted her charge report at GGHS Shabqadar Fort, District Charsadda vide dated 4.3.2013. That Last Pay certificate was also issued to the appellant by the concerned quarter and as such the appellant started her duty at the concerned station. Copies of the relieving, charge report and LPC are attached as annexure **G, H & I.**
- 5- That the respondent No.2 wrote a letter to the DEO (F), District Battagram for verification of the FA/F.SC certificate of the appellant and accordingly the same was verified by the concerned quarter. Copies of the verification letters are attached as annexure **J.**
- 6- That accordingly the pay of the appellant was released by the respondent No.3. That during service the appellant was further transfer to GGMS Kulalan, Charsadda vide order dated 2.11.2013 and after that to GGMS Rajjar, Charsadda vide order dated 30.7.2015. Copies of the orders are attached as annexure **K & L.**
- 7- That appellant while serving as Certified teacher at the concerned station salaries of the appellant were stopped/withheld by the respondents w.e.f. 1.10.2017 without any reason and clear justification. That feeling aggrieved the appellant preferred Departmental appeal before the competent authority but of no avail. Copy of the \Departmental appeal is attached as annexure **M.**
- 8- That having no other remedy the appellant filed this instant appeal on the following grounds amongst the others.

GROUND:

- A- That the inaction of the respondents by not releasing monthly salaries of the appellant w.e.f. 1.10.2017 till date is against the law, facts and norms of natural justice.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.

- C- That the respondent Department acted in arbitrary and malafide manner by not releasing monthly salaries of the appellant w.e.f. 1.10.2017 till date.
- D- That the appellant has been discriminated by the respondent Department on the subject noted above and as such the respondent violated the principle of natural justice.
- E- That the domicile and educational testimonials of the appellant have properly been verified by the concerned authority but inspite of that the respondents stopped/withheld the salaries of the appellant w.e.f. 1.10.2017 till date.
- F- That the respondent Department also violated the principle of "WORK DONE MUST PAID" by not releasing the monthly salaries of the appellant w.e.f. 1.10.2017 till date.
- G- That the respondents violated Article 11 of the Constitution of Pakistan 1973 read with Section 17 of the Civil servant Act, 1973 by not releasing monthly salaries of the appellant w.e.f. 1.8.2018 till date.
- H- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that appeal of the appellant may be accepted as prayed for.

Dated: 7.12.2018

APPELLANT

Nazma

NAZMA ALI

THROUGH:

Noor
NOOR MOHAMMAD KHATTAK
ADVOCATE

Nº 0047847

University of Peshawar

A-4



Pakistan
Detailed Marks Certificate

Bachelor of Arts

Part-II

Annual Examination 2010

District Charsadda



Private

Name: NAZMA ALI

Gender: Female

Roll No: 73070

Father's Name: MUHAMMAD ALI

Registration No: 2008-PE-11619

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Comp)	75	29	Twenty Nine
Urdu	75	41	Forty One
Islamic Studies	75	48	Forty Eight
Pakistan Studies	40	18	Eighteen
Part-I	285	138	One Hundred and Thirty Eight
Part-II	550	274	Two Hundred and Seventy Four

ATTESTED

(Dr. Mohammad Shafi)

ADDITIONAL CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Errors & omissions are subject to subsequent rectification

Chances Availed: 2

The Examination was taken in Parts

Examination held From 20-May-2010 to 28-Jun-2010

Result Declared on Monday, August 30, 2010

Issue Date: 01-Sep-2010

9:31 am



University of Peshawar Pakistan

5

Detailed Marks Certificate

Master of Arts in Islamiyat
Final
Annual Examination 2015
District Charsadda



Private

Name: NAZMA ALI

Gender: Female Roll No: 26674

Father's Name: MUHAMMAD ALI

Registration No: 2008-PE-11619

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al Quraan Translation 2nd Half & Com with Grammar-VI	100	60	Sixty Only
Usul al-Fiqh(Principles of Islamic Jurisprudence)-VII	100	57	Fifty Seven
Islam & Other World Religions-VIII	100	66	Sixty Six
Contemporary Muslim World-IX	100	63	Sixty Three
Islam, Modren Thought & Islamic Law of Inheritance-X	100	62	Sixty Two
Viva Voce	100	50	Fifty Only
Previous 12248:Annual:2014	500	302	Three Hundred and Two
Final	1100	660	Six Hundred and Sixty

Errors & omissions are subject to subsequent rectification

Chance: 1

The Examination was taken As a Whole

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

Issue Date: Thursday, February 11, 2016

Issue Date: 12-Feb-2016

10:32 am

ATTESTED

[Signature]

[Signature]

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

Serial No.

60692

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



6

Name: NADIA ALI
Father's Name: MUHAMMAD ALI
Address: MOH FATIMA KHEL RAJJAR P/O
RAJJAR D/O MUHAMMAD ALI

Roll No: W694382
Registration No: 07NCA0050
Final Semester: AUT-2007

Tehsil: CHARSADA
District: CHARSADA
has successfully completed **CERTIFICATE OF TEACHING**

Programme.

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR-07	0633	SCHOOL ORGANIZATION	100	69
SPR-07	0632	EDUCATIONAL PSYCHOLOGY	100	66
SPR-07	0631	DIMENSIONS IN EDUCATION	100	69
SPR-07	0638	TEACHING STRATEGIES & EVALUATION	100	51
AUT-07	0634	ENGLISH AND ITS TEACHING	100	54
AUT-07	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	80
AUT-07	0605	SOCIAL STUDIES & ITS TEACHING	100	66
AUT-07	0604	URDU LANGUAGE AND ITS TEACHING	100	57
AUT-07	0635	ISLAMIAT AND ITS TEACHING	100	72

ATTESTED

CREDITS: 5

Total Marks / Obtained 900 / 606

Result Declared on SEPTEMBER 29, 2008

Percentage / Grade 67 B

Date of issue OCTOBER 07, 2008

Controller of Examinations

Disclaimer:

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

RESULT INTIMATION CARD

POSTAGE PREPAID
No postage Required to be Affixed
Examinations Department AIQU.

PROGRAMME: C. T. (WORKSHOP) SEMESTER: AUTUMN-07 7
 ROLL NO.: W694382 REGISTRATION NO.: 07NCA0050
 NAME: NAZMA ALI
 FATHER NAME: MUHAMMAD ALI
 ADDRESS: MOH FATIMA KHEL RAJJAR P/O RAJJAR
 D/O MUHAMMAD ALI

CHARSADA

CHARSADA

SR. NO.	COURSE CODE	ASSIGNMENTS		FINAL MARKS				CONFL. MARKS	GRADE	RESULT
		Theory	Practical	Work-Shop	Teach Practice	Exam	Viva			
1	C. T-612 F			80				80	A+	PASS

ATTESTED

Signature of Dealing Official _____

Controller of Examinations

The result card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not itself confer any right or privilege independently to the grant of a proper Certificate/Degree which will be issued under the Regulations in due course.

29/09/2008

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

APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee and approval of the competent Authority the appointments of the following CT (F) candidates are hereby ordered at the ration of 25% Open Merit BPS-09 @Rs.3820-230-10720 plus usual allowances as admissible under the rules in the interest of public service w.e.f. the date of their taking over charge on the terms and conditions given below:-

S.No	Name of Candidates	Name of School where posted	Batch	Remarks
1	Shazia Bibi	GGMS Dubri Sultana Abad	1999	A.V Post
2	Nazma Ali	GGHS Banian	2005	-do-
3	Saima Jabeen	GGMS Shamlat	2006	-do-
4	Bibi Zenat	GGMS M.B./Khal	2007	-do-
5	Saima Zair Gul	GGMS Shinglipayeen	2007	-do-
6	Neelam Shiahzadi	GGMS Gidri Khair Abad	2007	-do-
7	Maria Masood	GGMS Gijbori Bar-Pow	2008	-do-
8	Muhsina	GGMS Pora	2008	-do-
9	Nagena Naz	GGMS Dabri Sultana Abad	2008	-do-
10	Saima Shouab	GGMS Argashori	2008	-do-
11	Hussan Bibi	GGMS Argashori	2008	-do-

TERMS AND CONDATIONS.

1.	Charge report should be submitted to all concerned.
2.	The appointees will get initial allowances as admissible to them under the rules. They will entitle for annual increments as per relevant Govt. policy however they will not be eligible for pension and gratuity as per current policy of Govt. of KP
3.	The appointees will produce Age & health certificate from the DHQ Hospital Battagram.
4.	Their service will be considered dealt as per rules and regulations of Govt. of KPK.
5.	Contribution of CP Fund will be as per rules and regulations of Govt of KPK
6.	The appointees are bound to take over charge in their respective schools within 15 days after issuance of this order.
7.	Those appointees whose documents proved bogus/fake they will be terminated From their services without serving any notice. They have no right to make approach to the department as will as court. Undertaking will also be recorded in their services books besides they will get no salary till the completion of verification
8.	The appointees will be Governed and dealt with current notified rules and policy of the Govt KPK. Finance Department.

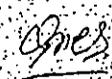
ATTESTED

(Muhammad Saeed)
Executive District Officer (E&SE)
Battagram

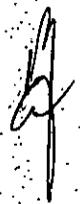
Endst: No. SS09-14/EB/AE-11/Appointments/2010 dated 28-7-2011
Copy forwarded for information and necessary action to the:

8
9

- 1- District Coordination Officer Battagram.
- 2- District Accounts Officer Battagram.
- 3- District Officer (F) Elementary & Secondary Education Battagram.
- 4- Assistant District Officer (B&A) Local Officer.
- 5- Candidates Concerned.


District Officer
Elementary & Secondary Education
Battagram


ATTESTED



(For use in Police Department only)

C-10

The entries on this form should be dated

Heirs, Passed B.E.D Examination from Allama Iqbal
 1. of Govt University Islamabad session 2015 under
 2. R.No BB 646831 marks - obtained 591/900 result declared
 3. on 14-01-2016

Name: _____
 Race: _____
 Residence: _____

Verification Roll No. _____ dated _____ received back _____
 Passed MA Examination from University of
 Peshawar Under R.No 26674 Session 2015

Father's name: _____
 Date of birth: _____
 nearly as _____

marks obtained 660/1000 result declared
 on 11-02-2016

Qualification Passed SSC exam from PAFSC
 Lahore w/Roll No. 0099858
 Session 2007 obtained marks 475/850
 English

Qualification First Arts

Pushto
 Govt. Girls High School
 Santa Battagram

B.L. or B.A

Urdu Passed FA exam from PAFSC
 Lahore w/Roll No. 0045348
 Session 2003 obtained marks 593/1100.
 Plan-drawing

Pleadership examination

Training School Final examination

Finger Print
 Govt. Girls High School
 Santa Battagram

Other qualifications

Drill Instructing
 Court Duties Passed BA exam from
 University of Peshawar
 w/Roll No. 73070 Session
 2006 obtained marks 275/350
 Reserve Duties

Passed CT exam from
 Allama Iqbal University Islamabad w/Roll No.
 W 694382 Session 2007
 obtained marks 66/100

Exact height: _____
 Personal: _____
 Left hand of (Non-): _____
 Little Finger: _____
 Middle Finger: _____
 Thumb: _____
 Signature: _____
 Signature: _____

Entries on this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

(11)

Nazma Ali
Afghan

Chisadda

Name and residence: Mohommad Ali

Birth by Christian era as far as can be ascertained: 02-10-1985
(2nd October N.H. - Eighty five)

Height by measurement: 5-6"

Facial marks for identification: nil

Thumb and Finger impression

ATTESTED

(Gazetted) officer:

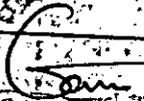
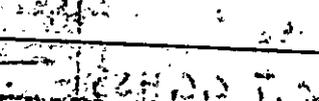
Index Finger:  Ring Finger: 

Fore Finger:  



Signature of Government Servant: Nazma Ali

Name and designation of the

12

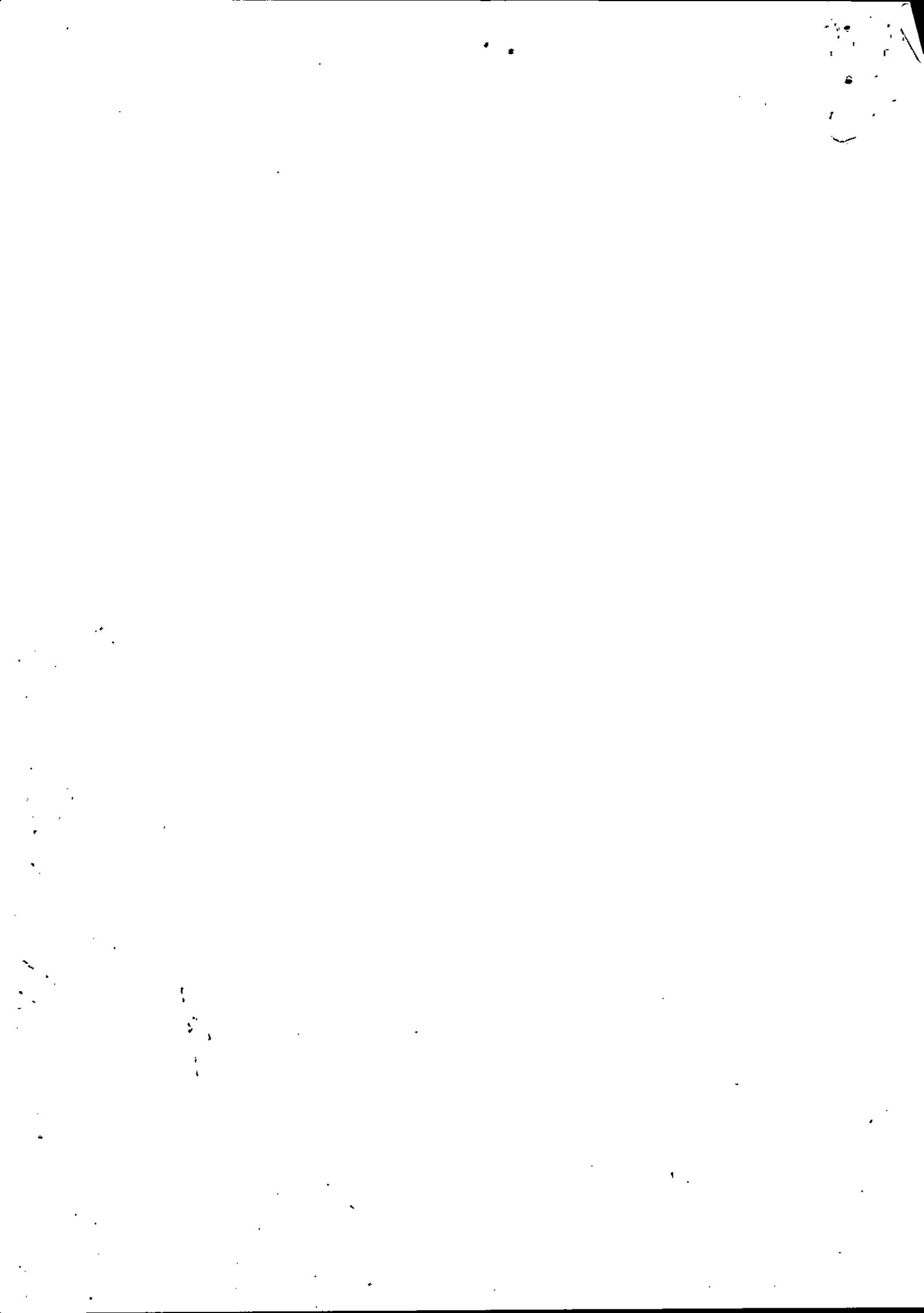
10	11	12	13		14	15
			Leave			
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
1st APR 11		<i>Janveer Akhtar</i> Head Mistress Govt. Girls High School Banla Battagram				Appointed as C.T BPS-09 at 99HS. Baniam against vacant post. Used vide executive District office, Elementary and Secondary Education, Banla Battagram, BndSR No: 5509-14 dated 28-1-2011
A/E 30/11		<i>Janveer Akhtar</i> Head Mistress Govt. Girls High School Banla Battagram				
R.P. 30/11		<i>Janveer Akhtar</i> Head Mistress Govt. Girls High School Banla Battagram				Service verified with effect from 28/1/2011 from the Acq Roll and other record of this office
Scale upgraded 30/11		<i>Janveer Akhtar</i> Head Mistress Govt. Girls High School Banla Battagram				Allowed BPS-14 on RA wef. 28-1-2011 vide EDO (ESSE) Bt. Endst no. dated
A/E 30/11		<i>Janveer Akhtar</i> Head Mistress Govt. Girls High School Banla Battagram				
A/E 30/11		<i>Janveer Akhtar</i> Head Mistress Govt. Girls High School Banla Battagram				Scale upgradation in BPS-15 wef. 1/10/11 vide Finance Deptt. PD/50/PRD 10-22/2007 dt: 26/08 wef. 1-7-2007

ATTEST

Janveer Akhtar
Head Mistress
Govt. Girls High School
Banla Battagram

Janveer Akhtar
Head Mistress
Govt. Girls High School
Banla Battagram

Janveer Akhtar
Head Mistress
Govt. Girls High School
Banla Battagram



D-16

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION BATTGRAM

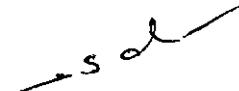
OFFICE ORDERS:

MST, Nazma Ali CT Govt Girls High school Banian Battgram is directed to perform her duty at Govt Girls Middle School Shamlai till further order.

Her salary will be drawn from her original station..ie GGHS Banian.

NOTE: charge report should be submitted to all concerned.

No TA, DA is allowed.


EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
BATTAGRAM

Endst: No 1355-59/EB/AE-II

dated 31-1-2011

Copy for information to the

1. District Accounts Officer Battagram
3. Headmistress GGHS Banian & GGMS Shamlai
4. Teacher concerned

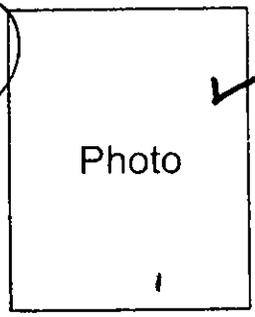
ATTESTED




EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
BATTAGRAM

Domicile Certificate

18



I declare that I was born of parents who are permanently Domiciled in N.W.F.P. having been born in this province.

I was born at Mohallah / Village

Tehsil District

Pursuance to the declaration dated 7-10-2006

.....
Sign. Applicant

Filled by

S/D/W of

of Mohallah Village

domiciled in N.W.F.P. It is hereby Certified that his/her Parents are permanent residents of the N.W.F.P. having born with in it.

I have satisfied myself from ~~personal~~ / my own knowledge / verification that the above declaration is true & certified accordingly. This day of 7 / 10 / 2006

ATTESTED
.....
Countersigned

Distt: Revenue Officer
District Officer

29241
7/10/06

.....
Deputy Distt. Revenue Officer

جناب عالی! تصدیق کی جاتی ہے کہ مکھی / مسماة فاطمہ مسیحی ولد / زوجہ محمود

محلہ فاطمہ محلہ سکنہ تحصیل ضلع میں
کا مستقل پیدائشی / رہائشی باشندہ ہے اور اس کے آباؤ اجداد بھی یہاں کے مستقل پیدائشی باشندگان ہیں اور پاکستانی ہیں۔ میں
ان کو ذاتی طور پر جانتا ہوں لہذا تصدیق عرض بخفہ ہے۔

سالم
Sahib
مہر و دستخط تصدیق کنندہ

جناب عالی! مندرجہ بالا تصدیق پر تصدیق کی جاتی ہے کہ مکھی / مسماة فاطمہ مسیحی

ولد / زوجہ محلہ سکنہ تحصیل ضلع میں
کا مستقل پیدائشی / رہائشی باشندہ ہے اور اس کے آباؤ اجداد بھی یہاں کے مستقل
پیدائشی باشندگان ہیں۔



SAHIB
Union Council Nagra & Gurdaspur.

مہر و دستخط تصدیق کنندہ

Verified
Sahib
S. Sahib
S. Sahib

F-19

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA

OFFICE ORDER.

Consequent upon the approval of the competent authority, Mr. Nazima Ali CT Govt Girls High School Baniar District Battagramme is hereby transferred / adjusted at Govt Girls High School Shabqadar Fort District Charsadda against CT vacant Post on his own pay and BPS in the interest of public service with effect from the date of his taking over charge.

Note:--

1. Charge report should be sent to all concerned.
2. NO.TA/DA etc are allowed.
3. The District Education officer (Female) Charsadda is directed to check all service documents before the release of pay.

DIRECTOR
Directorate of Elementary & Secondary,
Khyber Pakhtunkhwa Peshawar.

Endst: No 833-38 /A-16 CT 2013. Dated Peshawar the 1/3 2013.

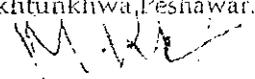
Copy for information to the:-

1. District Education Officer (Male) Charsadda / Battagramme
2. District Account Officer Charsadda / Battagramme
3. Principal concerned.
4. Teacher Concerned
5. PA to Director Local Directorate.
6. M/File.

ATTESTED



Deputy Director (Estab)
Directorate of Elementary & Secondary,
Khyber Pakhtunkhwa Peshawar.



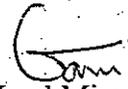
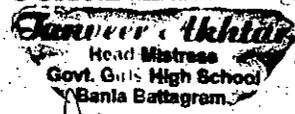
RELIEFING CERTIFICATE

G-20

Mst:Nazama Ali CT GGHS.Banian.Battagram is hereby relieved of her duty on the fore/after noon of 23/02/2013 in compliance with the order issued by the Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar under Endst No:1833-38 Dated:01/03/2013.

She is directed to report for his duty to her new station GGHS Shabqadar Fort District Charsadda immediately.


Principal
GGHSS
Shabqadr Fort (CHL)


Head Mistress
GGHS.Banian Battagram

Head Mistress
Govt. Girls High School
Banla Battagram

H - (21)

The Principal
GGHSS Shabqadar Fort

Subject: - Arrival Report

Consequent upon the orders issued

by Dy. Director EASE Peshawar K.P.K. Enclst
No. 1833-38 dated 1-3-2013

I the undersigned is hereby
Submitted my arrival report to day i.e.
on 4-3-2013, in GGHSS Shabqadar Fort
(Charsadda.)

It is requested that arrival
report on the above mentioned date may
kindly be accepted please.

Nazima Ali
Yours obediently

Nazima Ali C.T.

GGHSS Shabqadar Fort

Principal
GGHSS
Shabqadr Fort (CHL)

Accepted

ole

Fort
4-3-2013

Principal
GGHSS
Shabqadr Fort (CHL)

22

CERTIFICATE OF TRANSFER OF CHARGE 04-3-2013 (F.N)

- 1. Certified that we have on the fore/afternoon of this day respectively made over and receive charge of this office of the Principal GGHSS Shabqadar Fort (CHD) Transfer of C.T. to this school vide Dir. F&SE of RPE Pesh. Ex. No 1833-38/A-167 C.T. 2013 dt. Pesh. 01/3/2013
- 2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:---

Station: GGHSS SRF, CHD,

Signature of relieved Government servant: VACANT Post

Designation: C.T. (G)

Dated: 04-3-2013

Signature of relieving Government servant: [Signature]

Designation: C.T. (G)

No 958-60 dt 04-3-2013

Copies to All concerned for necessary action pl. Jic Zam

Principal Govt Girls Higher Secondary School Shabqadar Fort

[Signature] Principal GGHSS Shabqadar Fort (CHD)

LAST PAY CERTIFICATE.

I - 23

1. Last pay Certificate of Mst Nazma Ali CT (BPS-15)
Of the GGHS Banian Battagram.
Proceeding of transfer.
To GGHS Shabqadar Charsadda.
2. He has been paid upto 28-02-2013
At the following rates;-

Particulars.

Substantive Pay	Pay	9900
Officiating Pay	HRA.	1566
Exchange compensation allowances.	M.A.	1000
	UAA.	1000
	CA	2720
	Adh;Relf-10	2610
	Adh;Relf-11	783
	Adh Relf;12.	1980
	<u>Total Amount.</u>	<u>15133/-</u>

Dedications .

CFP-835/- B/F.180/-
AGIS-13/- GIS-154 EEF-15/-

Handwritten signature
District Accounts Officer
Battagram

She made over charge of the office
On the noon of

4. Recoveries are to be made from the pay of the Government Servant as detailed on the reverse.
5. She has been paid leave salary as detailed below. dedications have been made as on the reverse.

Period.	Rate.	Amount.
Fromto.....	at Rs.....a month
Fromto.....	at Rs.....a month
Fromto.....	at Rs.....a month

6. She is entitled to draw the following.
7. She is also entitled to joining time for.....days.
8. The detailed to the Income-Tax recovered from him upto the date from the beginning the current year are noted on the reverse.

No 7671-72/. Dated 28/2/13/.

- Copy forwarded to the;-
1. District Accounts Officer Charsadda.
2. Executive District Officer (E&SE) Charsadda..

ATTESTED

Handwritten signature

Handwritten signature
HEADMISTRESS
GGHS, Banian Battagram.

Janvier Chhila
Head Mistress
Govt. Girls High School
Banian Battagram

J-24

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE (E&S) BATTAGRAM.

NO. 8874 /Verification

Dated 17/4 /2013.

To

The District Education Officer (Female),
(E&S) Education Charsadda.

Subject: VERIFICATION OF SERVICE DOCUMENTS.

Memo:

Reference your letter No.2198 Dated 27/03/2013 on the subject noted above.

The transfer orders in respect of Mst; Nazma Ali CT GGHS Banian

Battagram under transfer to GGHS, Shabqadar Fort Charsadda issued vide

Director Elementary & Secondary Education Khyber Pakhtunkawa Peshawar order

Endst No.1833-38 Dated: 1-03-2013. Checked with office record verified and found correct.


DISTRICT EDUCATION OFFICER
(FEMALE (E&S) BATTAGRAM


Principal
GGHS
Shabqadar Fort (CHL)

OFFICE OF THE DISTRICT EDUCATION OFFICER
FEMALE CHARSAJDA

NO. 2379 /DATED/ 24/4 /13

25

To

The Principal,
GGHSS SKF
Charsajda

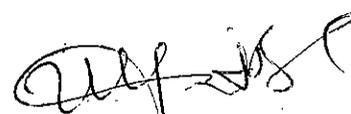
SUBJECT: - VERIFICATION
Memo

Reference your letter No.961 Dated 15-03-2013 on the subject cited above.

In this connection the undersigned has been deputed Mr Khadim Shah Supdt: Local office for the purpose of verification in respect of Mstt: Nazma Ali CT From the concerned offices.

The Said verification has been made and found correct as per DEO (Female) Battagram letter No. 8874 Dated 17-04-2013 (Copy attached).

You are requested to release the pay of the concerned Mistress after verification of all academic and professional documents.


DISTRICT EDUCATION OFFICER
FEMALE CHARSAJDA

Endstt: No. _____

Copy to the:

1. Director, E&SE Khyber Pakhtunkhwa Peshawar with reference to his Endstt. No.833-38/Dated 01/03 /2013.


Principal
GGHSS
Shabqadr Fort (CHL)


DISTRICT EDUCATION OFFICER
FEMALE CHARSAJDA

26

OFFICE OF THE PRINCIPAL
GGHSS SHABQADAR FORT (CHD).

NO. 973 DATED 22.03.2013.

To:

The Controller of Examination
B.I.S.E. Lahore Board.

Subject:- VERIFICATION OF SSC/FA IN R.O. NAZMA ALI D/O
MUHAMMAD ALI.

Memo:-

I have the honour to enclosed herewith SSG/FA DMG/
Certificates in the respect of Nazma Ali Muhammed Ali is hereby
submitted for verification and early return to the undersigned, the
detail are as under:-

S.No.	Name of Candidate	Father, s Name	R.No	Session	Marks.	Name of Exam
1.	Nazma Ali	Muhammad Ali	0092858	2001-A	475	S.S.C.
2	Nazma Ali	Mouammed Ali	0045348	2003-A	593	F.A

[Signature]
Principal
GGHSS
Shabqadr Fort (CHD)

[Signature]

PRINCIPAL
GGHSS SHABQADAR FORT
CHARSABDA.

No: 00693939

27

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Serial No. 19126

Roll No. 0045348



ATTACHED

BOARD OF INTERMEDIATE & SECONDARY EDUCATION, LAHORE

Intermediate ANNUAL Examination 2003.

HUMANITIES Group

Certified that NAZMA ALI

Son/Daughter of MUHAMMAD ALI

Registered No. 19894-PVT.-2002

College/District SHEIKHUPURA

has passed the Intermediate Examination, conducted by this Board in FULL as a PRIVATE candidate. He/She offered the subjects and obtained the marks as follows:

Sr.No.	SUBJECTS	MARKS	
		Maximum	Obtained
1.	URDU (COMPULSARY)	200	124
2.	ENGLISH (COMPULSARY)	200	072
3.	ISLAMIATE (COMPULSARY)	50	35
4.	PAKISTAN STUDIES (COMPULSARY)	50	33
5.	EDUCATION	200	100
6.	PUNJABI	200	127
7.	ISLAMIC STUDIES	200	102
TOTAL MARKS (In Figures)		1100	593
(In Words)		FIVE HUNDRED NINETY THREE ONLY	

External Grade: C

Lahore JULY 31, 2003

Principal GGHSS Shabqadr Fort (CHL)

Assistant Controller (Records) For Secretary Board of Intermediate & Secondary Education, Lahore

SECRETARY

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BETTER COPY OF PAGE NO.31

OFFICE OF THE PRINCIPAL GGHSS SHABQADAR FORT CHARSAJDA

RELIEVING CHIT

Mrs Nazma Ali C.T of GGHSS Shabqadar Fort (Charsadda) has been transferred to GGMS Mufti Abad Charsadda order issued by DEO (F) Charsadda vide Endst: No. 3162-67 dated 2-11-2013.

You are hereby relieved from your duty today on 01-11-2013 and you are directed to attend at your new station GGMS Mufti Abad Charsadda for further duty immediately.

PRINCIPAL
GGHSS SHABQADAR FORT
CHARSAJDA

OFFICE OF THE PRINCIPAL GONSS SHAHQADAR FORT (CHARSADDA).

پہلے تینویں چیت

Mrs Nazma Ali C.D of GONSS Shaheedar Fort (Charsadda) has been transferred to GOMS Mufti Abad Charsadda order issued by DEO (F) Charsadda vide Endst: No. 3162-67 dated 2-11-2018.

You are hereby relieved from your duty today on 24-11-2018 and you are directed to attend at your New station GOMS Mufti Abad Charsadda for further duty immediately.

AC
Principal
GONSS SHAHQADAR FORT
CHARSADDA.

ATTESTED



32

9

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA.

OFFICE ORDER

Transfer /Adjustment of the following Teachers are hereby ordered on their own pay & BPS to the schools noted against each name in the interest of public service with immediate effect.

S.No	Name of teacher	Designation	From	To	Remarks
1	Taskeen Tabasum	SST (G)	GGHS Dhab Banda	GGHSS Sherpao	V.S.No.2
2	Safia Begum	SST (G)	GGHSS Sherpao	GGHS Dhab Banda	V.S.No.1
3	Shahzadi Sarwat	SST(Sc)	GGHSS Sherpao	GGHSS Turangzai	Newly Sanctioned Post
4	Farah Naz	SST (Sc)	GGHS Sheikh Killi	GGCMHS Charsadda	Newly Sanctioned Post
5	Hussan Maab SST(SC)Pay.Math working SST (G)	SST	GGHS Charsadda	GGHS Charsadda	Against SST SST(SC)
6	Shehla Rukh	CT B-15	GGMS Kalyas	GGMS Toor Killi Haleem Abad	A.V.P
7	Tauheed Jamal	SrCT B-16	GGHS Shah Passand Killi	GGHS Dhab Banda	A.V.P
8	Shehla Rahman	CT B-15	GGMS Wardaga	GGMS Umar Abad	A.V.P
9	Mehreen Gul	CT B-15	GGMS Sheikh Abad Nisatta	GGMS Tariq Abad Utmanzai	A.V.P
10	Nazima Ali	CT B-15	GGMS Mufti Abad Kulalan	GGMS Rajjar	A.V.P
11	Tauheed Begum	Qaria B-12	GGHS Dhab Banda	GGHS Prang	A.V.P
12	Sitara Gul	Qaria B-12	GGHS Sheikh Killi	GGHS Dhab Banda	A.V.P

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

(MISS ZUHRA AKHUNZADA)
DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA.

Endstt: No. 2653-57 /Dated/ 30/7 /2015.

Copy to the:

1. PA to Director E&SE Khyber Pakhtunkhwa Peshawar
2. District Account Officer Charsadda.
3. Principal / Head Mistresses Concerned.
4. SDEO (Female) Charsadda.
5. Supdt Local Office.
6. Official Concerned
7. Office Copy.


DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA.

ATTESTED



CERTIFICATE OF TRANSFER OF CHARGE

33

I. Certified that I have on the fore/ noon 31/7/2015 of this day respectively made over and received charge of the Office of the CT - G. G. M. S.
Rajjar Charsadda vide D.F.O. (F) Ord. - Encl. No. 2633-57 dt. 31/7/2015

Signature of relieved _____
Government Servant: Vacant Post
Designation CT

Station Charsadda

Signature of relieving Nazima Ali
Government Servant Nazima Ali
Designation CT

Dated: 31/07/2015

OFFICE OF THE HEAD MISTRESS GGHS SIABQADAR FORT CHARSHADDA

No. _____ / Dated _____ / 2015

- Copy for information to the:
1. District Accounts Officer Charsadda.
 2. Head Mistress GGHS Behlola.
 3. Teacher concerned.
 4. Officer record.

ATTESTED

[Signature]

[Handwritten mark]

کتابخانه عمومی

L-34
کتابخانه

کتابخانه عمومی
کتابخانه عمومی

کتابخانه عمومی

کتابخانه عمومی

کتابخانه

کتابخانه عمومی

28-8-18

ATTESTED

Handwritten signature

Handwritten signature

4595

29-8-18

Handwritten signature and date 29-8-18

VAKALATNAMA

Before the KP Service Tribunal Peshawar.

_____ OF 2018

Nazma Ali

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education's Department

(RESPONDENT)
(DEFENDANT)

I/We Nazma Ali

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2018

Nazma Ali

CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

MUHAMMAD MAAZ MADNI
ADVOCATES

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391
Mobile No.0345-9383141

Charsadda

S#:1

P Sec:001 Month:September 2017
CA6098 -DISTRICT OFFICER SCHOOL AN
GOVT MIDDLE SCHOOLS (FEMA

Pers #: 00693939 Buckle:

Name: NAZMA ALI
CERTIFICATED TEACHER

NTN:

GPF #:

Old #:

CNIC No.3540117568776

GPF Interest Applied

15 Vocational Temporary

CA6098 -70

PAYS AND ALLOWANCES:

0001-Basic Pay	25,430.00
1000-House Rent Allowance	1,566.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
2148-15% Adhoc Relief All-2013	600.00
2199-Adhoc Relief Allow @10%	410.00
2211-Adhoc Relief All 2016 10%	2,135.00
2224-Adhoc Relief All 2017 10%	2,543.00

Gross Pay and Allowances 37,040.00

DEDUCTIONS:

IT Payable 413.37 Deducted 69.00	TAX:(3609) 46.00
GPF Balance 117,719.00	Subrc: 2,890.00
3501-Benevolent Fund	600.00
3990-Emp.Edu. Fund KPK	125.00
4004-R. Benefits & Death Comp:	1,052.00

Total Deductions 4,713.00

32,327.00

D.O.B
02.10.1985

LFP Quota:
ALLIED BANK LIMITED TEHSIL BAZAR
120063807

06 Years 08 Months 004 Days

Charsadda

S#:1

P Sec:001 Month:August 2017
CA6098 -DISTRICT OFFICER SCHOOL AN
GOVT MIDDLE SCHOOLS (FEMA

Pers #: 00693939 Buckle:

Name: NAZMA ALI
CERTIFICATED TEACHER

NTN:

GPF #:

CNIC No.3540117568776

Old #:

GPF Interest Applied

15 Vocational Temporary

CA6098 -70

PAYS AND ALLOWANCES:

0001-Basic Pay	25,430.00
1000-House Rent Allowance	1,566.00
1300-Medical Allowance	1,500.00
2148-15% Adhoc Relief All-2013	600.00
2199-Adhoc Relief Allow @10%	410.00
2211-Adhoc Relief All 2016 10%	2,135.00
2224-Adhoc Relief All 2017 10%	2,543.00
5011-Adj Conveyance Allowance	1,428.00

Gross Pay and Allowances

35,612.00

DEDUCTIONS:

IT Payable	116.90	Deducted	23.00	TAX: (3609)	12.00
GPF Balance	114,829.00			Subrc:	2,425.00
3501-Benevolent Fund					600.00
3990-Emp.Edu. Fund KPK					125.00
4004-R. Benefits & Death Comp:					600.00

Total Deductions

3,762.00

31,850.00

D.O.B

02.10.1985

LFP Quota:

ALLIED BANK LIMITED TEHSIL BAZAR

06 Years 07 Months 005 Days

120063807

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 1504/2018

Mst Nazma Ali

Vs

Govt. of Khyber Pakhtunkhwa

INDEX

S.No.	Description	Annexure	Page
1	Comments		1-3
2	Affidavit		4
3	Annexure	A,B,C	5 - 14

1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No 1504/2018

Mst Nazma Ali

Vs

Govt. of Khyber Pakhtunkhwa

Written Reply on behalf of Respondents

Respectfully Sheweth:

Preliminary Objections:

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

PARA WISE REPLY ON FACTS:

1. Para 1 Incorrect & concocted the Appointment order of the appellant along with others teachers found fake & bogus after conducting Enquiry and also registered FIR against the Similarly fake teachers(**Copy of Enquiry & FIR annexure A**)
2. Incorrect, false and concocted hence denied, the Appellant just mislead the Hon,ble tribunal by self-made story moreover reply as para above)
3. Incorrect, all the record of appellant is fake & bogus hence certified teacher is District cadre post and District Battagram hailing from Hazara division.
4. Para 4 related to the personal information of the Appellant, further reply as Per enquiry report.
5. Incorrect, according to categorically statement of the DEO (F) Battaram (**Mst Rehana Yasmeen**) through E-mail that signature put on subject letter is fake, I did not signed on such type of letter not dispatch number and regretted to say letter is Totally bogus and fake signature. (**COPY OF E-mail letter annexure B**)
6. That in the light of Enquiry report the Competent authority issued dismissal order of the appellant and also wrote to the Anti-corruption Department & others concerned Department may registered an FIR against the Appellant and all amount taken as salaries may be recovered and refund to Government exchequer. (**Copy annexure C**) hence the Appellant not come within the ambit of Civil servant due to having fake appointment order.
7. That the Appointment order of the appellant found fake in the light of the Enquiry report and also issued dismissal notification of the appellant
8. That the respondent department acted as per law.

ON GROUNDS:

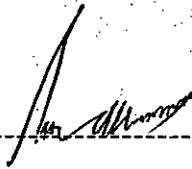
- A. Incorrect the respondents acted accordance with law hence as per recommendation of the enquiry report the appointment order of the appellant was fake & bogus.
- B. Incorrect and baseless, enquiry already conducted against the appellant, detail reply has been given in the above para .
- C. Incorrect and against the actual facts, A detail reply has been given in above para 6.
- D. Incorrect as replied in para 6, the appellant has no valid ground to rely on. Similarly placed cases subjudice before the Peshawar high court and lodge FIR against the all fake teachers who was transfer from District Battagram.

- E. Reply of this ground as per para 6, moreover the appointment order of the appellat found fake and bogus and also issued direction to the Anti-corruption department for registered FIR against the appellat.
- F. That the appointment order of the Appellant declared fake & bogus in the light of enquiry report hence the Appointment order of the Appellant void ab initio.
- G. No constitutional right of the appellat has been violated the appellat just invoke constitutional jurisdiction of the Hon,,ble tribunal.
- H. That the answering respondent also seek permission of the Hon,ble tribunal to adduce further points at the time of arguments.

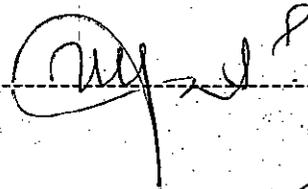
It is, therefore, most humbly prayed that the appeal of the appellat may be dismissed with cost.

Respondents:

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



3 District Education officer female Chrsadda-----



3 District Account officer District Charsadda-----



4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No 1504/2018

Mst Nazma Ali

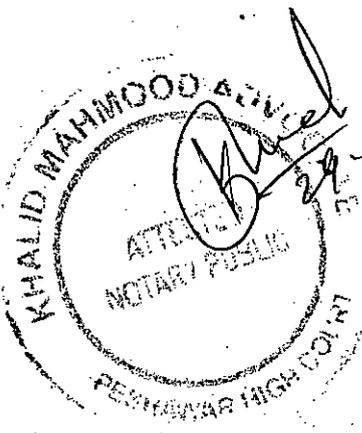
Vs

Govt. of Khyber Pakhtunkhwa

Written Reply on behalf of Respondents

AFFIDAVIT

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



Deponent

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

ANNEX W (A)

5

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Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

2839

No _____ F. No. Inquiry/2019
Dated Peshawar 13/2/2019

To.

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

Subject:-

Inquiry Report.

Memo.

P-193

Reference notification No.9749-51 Dated 26-10-2018 wherein the under signed was appointed as Inquiry Officer in r/o Mst. Nazma Ali C.T transfer from District Batagram to district Charsadda.

Please find attached herewith the inquiry report for information and further necessary action.

Mehal
13/2/19

Deputy Director (B/TRG)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No _____
Copy for information to the.

- 2. PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

Deputy Director (B/TRG)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

1755
15/2

ADDE.

The inquiry report may be
imp. commented in letter
✓ Spirit.

Haroon
14/2/19

DD(P)

389

14-2-19

Zahid
15/2

6

204

INQUIRY REPORT

PERTAINING TO THE TRANSFER OF Mst NAZMA ALI CT
FROM DISTRICT BATTAGRAM TO DISTRICT CHARSADE

AUTHORITY

DIRECTOR

ELEMENTARY & SECONDARY EDUCATION

KHYBER PAKHTUNKHWA PESHAWAR

INQUIRY OFFICER

NAHEED ANJUM

DEPUTY DIRECTOR E&SE KHYBER PAKHTUNKHWA

7

20

INQUIRY REPORT

TERMS OF REFERENCE

The Director E&SE Khyber Pakhtunkhwa Peshawar was pleased to nominate the undersigned as the enquiry officer under the Notification Endst No.9749-51/F.NO14/(F) Appeal Charsadda Dated Pesh the 26/10/2018(Annexure-I).

BACKGROUND:

The DEO (F) Charsadda requested the worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa vide Letter No.19585 Dated 5/10/2018 to order an inquiry regarding the transfer of Mst. Nazma Ali CT from Battagram to Charsadda (Annexure-II).

PROCEDURE:

1. After intimating vide Letter No. 2048 Dated:09/11/18(Annexure-III), the undersigned visited the Office of the District Education Female, Charsadda on 14/11/2018. She perused and collected all the relevant available record. During the visit of DEO(F) office, Mst; Nazma was also present (Annexure-IV). She submitted her written statement on the spot.
2. Letter No. 195 Dated 1/11/18 and Letter No. 2048 Dated 9/11/18(Annexure-V &VI) were sent to the District Education Officer (F) Battagram requesting him to direct the dealing hands to attend the office of the undersigned along with all relevant record. He attended the office however, he provided incomplete record. The DEO(F) Battagram was again requested vide Letter No. 8609 dated 31/1/2019(Annexure-VII) and was telephonically contacted as well but the requisite information was not provided.
3. The Deputy Director (F)Establishment Directorate of E&SE was requested vide Letter No. 193 Dated 01/11/2018 (Annexure-VIII) to verify the transfer order of Mst. Nazma from Battagram to Charsadda. In response, vide Letter No 603/F.No.14/Appeal Charsadda Dated Peshawar the 21/12/2018(Annexure-IX) it was replied that the file had been misplaced during shifting of office and the dispatch/issue register was in the custody of NAB and they did not possess any record pertaining to the transfer in question.
4. The existing dealing assistant of Deputy Director (F)Establishment Directorate of E&SE Mr. Muhammad Zahir was asked vide Letter No. 380 Dated 1/1/2019(Annexure-X) to record statement regarding misplacement of the required file. In reply, he said that the dealing assistant in 2013, was Mr. Munir and that he would be in a better position to response (Annexure-XI). Therefore, Mr. Munir Khan, the then dealing assistant was asked vide No 794 Dated 3/1/19(Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education. (Annexure-XIII). So, in those conditions the



2018

inquiry officer was unable to retrieve any official record or documents despite issuing official letters.

5. Letter to District Education Officer Male Swat was sent vide No. 5265 Dated 22/11/2018(Annexure-XIV) to direct Mr. Khadim Shah the then Suptt Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as he had personally visited the DEO Office Battagram to verify the documents of Mst. Nazma. Statement of Mr. Khadim Shah was recorded (Annexure-XV).
6. Studied the case thoroughly.
7. Reported findings accordingly.

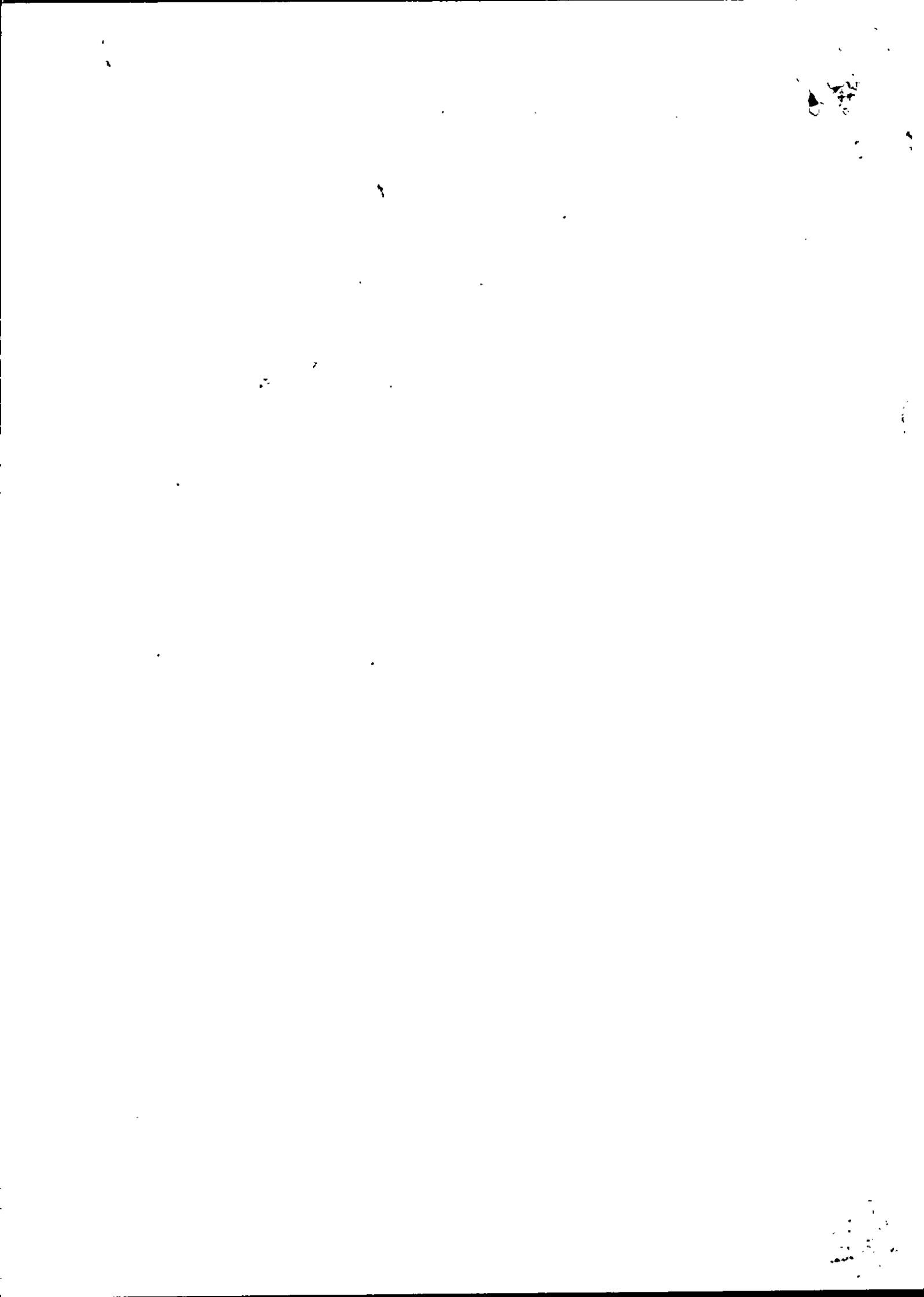
DETAILS:

i. SUMMARY OF THE STATEMENT OF MST NAZMA

After detailed verbal discussion in the office of District Education Officer, Mst Nazma Ali gave written statement in the presence of DEO (F). She stated that she was appointed in GGHS Banian District Battagram vide Endst No5509-14/FB/AE-II/Appointment/2010 Dated 28/1/2011(Annexure-XVI) as a CT without any written test. As CT post was not lying vacant in GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office order endorsement No 1385-89 Dated 31/1/2011 (Annexure-XVII). Her husband was posted in account office Battagram as a class IV. He belonged to District Charsadda. After four months she applied for medical leave but she could not provide any record of her medical leave to the undersigned. According to her statement she was transferred to Charsadda vide endorsement No. 1833-38/A-167CT2013 Dated Peshawar the 1/3/2013. She provided charge report in GGMS Shamlae, relieving certificate from GGHS Banian, Application for transfer, transfer order, attendance register of GGMS Shamlai, pay slip along with her written statement (Annexure XVIII a,b,c,d,e,f,g). Surprisingly pay slip which she provided name of the school is GHS Asharban.

ii. SUMMARY OF THE STATEMENT OF MR. MUHAMMAD JAMIL SUPERINTENDENT BATTAGRAM:

Mr. Muhammad Jamil superintendent office of the DEO (F) Battagram visited the office of the undersigned twice on 28/11/2018 and 6/12/2018. He provided incomplete record and only provide an appointment order of 2011(Annexure-XIX), Photocopy of statements of Headmistresses of GGHS Banian and GGMS Shamlae (upgraded to high school in June 2012), letter of DEO (F) Battagram attendance register of GGMS Shamlae (Annexure-XX, a, b, c & d). He gave the statement that the name of MST Nazma could neither be found in the appointment order nor in the attendance register (Annexure-XXI). A Written statement given by the Headmistress of GGHS Shamlae saying that, as per the attendance register no teacher on the subject name was found". DEO female in his letter also mentioned that the name of Mst. Nazma was not found in any school of Battagram. He provided minutes of DSC meeting in which



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of total 12 vacant posts, 9 posts were recommended/approved to be filled from batch wise list (quota) and 3 from open merit, at the ratio of 75% and 25% as per policy that time in vogue. However, 10 candidates were appointed in batch wise quota and 3 from open merit, total 13 appointments were made instead of 12. In the appointment order provided by Mst. Nazma Ali 11 candidates were enlisted. Alarming, the appointment file was incomplete and a transfer file of that period was missing in the office of the DEO Battagram. (Annexure XXII a, b)

iii. SUMMARY OF THE STATEMENT OF MR. KHADIM SHAH EX-SUPERINTENDENT CHARSADDA:

Mr. Khadim Shah recorded his statement and clarified that he visited office of the DEO (F) Battagram to verify the service documents of Mst. Nazma by hand on 14/4/2013 and checked all the record their but due to absence of DEO (F) Battagram on that day he left the record for signatures/verification. Later on, the verification was sent to DEO (F) Charsadda vide letter no 8874/verification Dated 17/4/2013 through post/ Mail. (Annexure-XXIII). He also provided attendance certificate signed by the then DDEO Battagram, Mr. Fida Muhammad (Annexure-XXIV). It is astonishing that all the record was also signed by the same DDEO but not provided by hand and sent that through post.

ORIGIN OF THE ISSUE:

During visit of DEO (F) Office Charsadda, the DEO female told that she requested for the inquiry after the anticorruption Charsadda sent a letter to her office on 25/9/17, regarding detail of the teachers who were transferred from other districts and FATA from 2006 onward. (Annexure-XXV). Hence, a letter for the verification of service documents was again sent vide letter no 7972/Dated 21/10/2017 to DEO (F) Battagram. (Annexure-XXVI). Reminder for verification was sent vide endorsement no 18919 dated 3/2/2018. (Annexure-XXVII). The documents were received duly verified, vide letter no 5390 Dated Battagram the 9/3/2018 bearing signatures like the then DEO (F) Battagram MST Rehana Yasmin. (Annexure-XXVIII). The DEO Charsadda was worried about fake appointments so, she sent the documents to the DEO (F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) Battagram in which she told that not only the verification letter was fake but also the dispatch number on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted that District accounts office Battagram verified her LPC vide letter no 174 DAO/BM Dated 13/04/2013 (Annexure-XXX a, b).

Findings

From the available record of both the DEO (F) Offices, statement of all the people/officials concerned, it is clear that;

- The appointment order is fake and bogus.

(10)

~~2018~~

- Teacher attendance register of GGMS Shamlae revealed that she had never been a part of that school.
- The salary record was not traceable from Battagram.
- Transfer order issued by the directorate was also not confirmed as the file was missing in the directorate.
- The academic documents provided were also not verified by the institutions concerned.
- Verification of all document also proved to be fake.
- The ministerial staff in the female DEO office are responsible for the loss or non-production of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

RECOMMENDATIONS

1. The fake appointment order produced by Mst. Nazma may be treated as no effect and be treated as null and void ab initio. The DEO (F) Charsadda may register a FIR in the Anti-Corruption against the said teacher.
2. All amount taken as salary may be recovered and refund to government exchequer.
3. An in-depth inquiry may be initiated against the Ministerial staff of DEO office Battagram and establishment branch in Directorate for their casual handling of the office record and squandering valuable official record pertaining to the appointment /transfer and they should then be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
4. DEO female office Battagram may be directed to bring her house in order, recover the official record of her office and secure them from loss.

The report is submitted for perusal and further necessary action under the rules, please.

Naheed
12/2/19

Miss Naheed Anjum

Deputy Director

E&SE Khyber Pakhtunkhwa

تلمذ شدہ بیانات، حرمول شدہ و پرنٹنگن رپورٹ حاتمہ و نسلی انتوائرن سے تمام ملزمان
 اضیاء میں پمیل ٹیچر DMO گریڈ GMS9 جدیدیاں ڈھیری جارہے ② نگیٹ سیمای میں ٹیچر AT
 یڈ GMS15 دادہ کے ③ حدت فی پمیل ٹیچر PET گریڈ GMS9 ترملا ندی ④ ٹائینہ ولی فی پمیل
 ٹیچر SST گریڈ 16 GMS9 دہت پورن ⑤ سٹو بیگم فی پمیل ٹیچر PST گریڈ 7 GMS9 پنام گورنر
 بارہہ ⑥ صوفیہ DEO فی پمیل گریڈ 19 صلہ جارہے ⑦ الفت بیگم سابقہ DEO فی پمیل گریڈ فی اصلو
 ریدہ ⑧ قدا یاز DAO گریڈ 18 صلہ شدہ ام حال ڈسبس ⑨ حامد یونس سب امانت گریڈ 15
 و شدہ ام حال ڈسبس ⑩ قدا ریاض سب امانت گریڈ 16 صلہ شدہ ام حال د فترہ DAO صلہ جائیدہ ⑪
 ان پشورہ 14 گریڈ صلہ جائیدہ د فترہ DAO ⑫ طاری قسور ATO گریڈ 16 صلہ شدہ ام ⑬
 رنگزیب سب امانت گریڈ 15 د فترہ DAO شدہ ام حال ڈسبس ⑭ قدا امین سب امانت گریڈ 14
 امانت گریڈ سب امانت ⑮ قساق احمد سب امانت گریڈ 17 د فترہ DEO فی پمیل جارہے
 علی رضن سب امانت د فترہ DEO فی پمیل صلہ شدہ ام گریڈ 17 ⑯ حفیہ حسین جو نیر حکرت گریڈ 11
 ترمہ DEO فی پمیل جارہے ⑰ قدا امین سب امانت گریڈ 11 د فترہ SDEO فی پمیل گریڈ ⑱ سہیل PST
 گریڈ 18 PS سب امانت جو پورٹ ⑳ سرتاج جو نیر حکرت گریڈ 11 د فترہ SDEO فی پمیل جارہے ام حال
 ایگزٹا جارہے وقتا وقتا ایسین ملی نڈت کرے فراڈ د جو کم دسی سے اپنے احصارات کے غلط و ناجائز
 ال کرے صلہ جارہے سب سب سب سب کو نتوان و مد میں صلہ 5766918 روس لفسان پویا
 جبکہ بیانات تلمذ شدہ زبردست 16/11/17 سے مایا گیا کہ ملزمان سب سب ملزم کا نام 2 ایف منظم کر کے
 بینک کے اکاؤنٹ میں اسی طرح کارروائی کر کے تو گوں کو نوکری یا جائیدہ دیکھ کر ان سے مدد گوں سے پتہ چلے
 ہیں کہ تمام ملزمان کا نام 20 ایسین ملی نڈت فراڈ د جو کم دسی احصارات کے غلط اور ناجائز
 شمال اور جنوب دینے اور پنے کے بعد ملک پارکین کے خلاف حرام جس انگریزی میں 15313 جونہ 9/10/17
 یہ از حجاب DAC خبر بخوشواں نے ور مقدمہ درجہ ریجسٹر کیا جاتا ہے تمام نوکری کارروائی ملزم کا صلہ
 اور ہوا اگر دوران ترمین دیکھوں تمھیں یا اشخاص یا دیگر سرکاری ملزمین صلہ مانتے گئے تو ان کے
 حق بھی حسب ضابطہ قانونی کارروائی محسب میں لیا جائیگی۔ پھر گزارش یہ میں صورت

میں ہوئی
 COACECHD
 9-10-017

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

ANNEXURE B

31 ✓

13

Rehana Yasmin <deorehanabasi@gmail.com>

To: DEOFEMALE CHARSAJDA

May 23 at 7:47 AM

R/DEO F

Charsajda

Reference your letter received through e mail for verification

It is stated that signature put on subject letter is fake .I did not signed on such type of letter nor dispatch no. put on letter mach with despatched register of o/o undersigned copy of dispatched register attached. Therefore it is regretted to say letter is totaly bogus and fake signature with fake d/no put on that.

REHANA YASMIN
DEO F BATTAGRAM



Office of the District Education Officer Female District Charsadda

14

☎ 0919220086

✉ emischarsadda.deof@yahoo.com

No. _____ / Dated _____ / 2019

NOTIFICATION

1 Whereas Mst Nazma Ali CT (BPS-15) GGHS Rajjar r/o Rajjar Charsadda, was proceeded under Khyber Pakhtun khwa Govt. servants (Efficiency and Discipline) Rules 2011, on the charges of Fake Appointment.)

2 And whereas the undersigned directed to the accused teachers through notice time and again and found her as a fake appointee.

And whereas the Worthy director E&SE Deptt Khyber Pakhtun khwa Peshawar initiated/conducted enquiry Vide No, 6754 F, No. 14 (F)/ Appeal Charsadda, dated 24-05-2019 against Mst Nazma Ali (CT) through Mst Naheed Anjum Deputy Director Female E&SE Khyber Pukhtoon-khwa, Hence the Appointment order of Mst Nazma Ali declared fake by the enquiry officer with the direction to the DEO (F) Charsadda may register an FIR in the Anti Corruption against the said fake teacher and all amount taken as salary may be recovered and refund to Government exchequer,

3 And Whereas, the show cause notices vide NO 16615 dated 30/5/2018, No,16665 dated,2/6/2018, No16736 dated 6/6/2018 and personal hearing 20825 dated 13/11/2018 and E-mail verification by DEO(F) Battagram dated 23-5-2019 was served upon to Mst Nazma Ali Through DEO (F) Charsadda.

4 And Whereas, the authority having considering the charges, evidence on the record as per enquiry report, hence keeping in view the charges leveled against her have been proved hence she is not remained a civil servant under the rules on account of fake appointment lettet.

Therefore, in exercise of the powers conferred by the Khyber pakhtun khwa Govt. servants, (Efficiency and Discipline) rules 2011, the competent authority is pleased to impose the **Major penalty of Dismissal from service upon Mst Nazma Ali CT GGHS Rajjar Distt Charsadda** with immediate effect

The DDEO (F) Charsadda already stopped her salary due to having fake appointment letter.

(Ulfat Begum)

District Education officer (Female)
Charsadda

Endst No. (1508-15) dated (19/7) 2019

Copy forwarded for information and n/action to the;

1. PA to the Director E & S Education Khyber Pakhton khwa Peshawar.
2. PA to the Deputy Commissioner Charsadda.
3. District Monitoring Officer E & SE Charsadda.
4. District Accounts Officers Charsadda.
5. The Concerned DDEO Female Charsadda with the request to recovered the salaries and deposit in Govt. Treasury through Challan under intimation to this office.
6. Head teacher GGHS rajjar Charsadda
7. Mst Nazma Ali Ex CT Charsadda..
8. ADO Estab Primaay Local Office.
9. The Anti-Corruption Department Charsadda may be request to register FIR against the said fake teacher for Compliance the Enquiry recommendation.
10. Master File.

District Education officer (Female)
Charsadda