

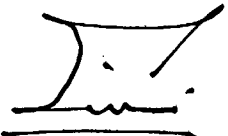
06.06.2022

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

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 18.08.2022 before the D.B.



(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

18.8.22

due to business variation the case is adjourned to 15-9-22 for the Queen.



15.09.2022

Nemo for parties.

Muhammad Adeel, learned Additional Advocate General present.

Preceding date was changed on Reader note, therefore, both parties be put on notice for arguments on 13.10.2022 before D.B.

Noted

5/10/22

Local respondent were put on notice for the date fixed 13/10/2022 while out district was not served upon notice.



(Fareeha Paul)
Member (E)




(Rozina Rehman)
Member (J)


02.08.2021

Learned counsel for the appellant present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Javed Iqbal Stenographer for respondents present.

At the very outset, a notification bearing endorsement No.2715-20 dated 10.10.2019 was produced which shows that in compliance to the judgment of Hon'ble Pehsawar High Court, the present appellant alongwith others were conditionally appointed subject to final decision filed in the Hon'ble Supreme Court of Pakistan. When learned counsel was confronted with the notification he requested for adjournment in order to apprise the Tribunal in respect of the present situation. Case is adjourned to 09.12.2021 for arguments/ further proceedings in view of the notification produced today before this Tribunal.

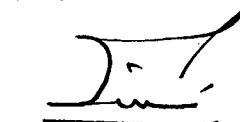

(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

09.12.2021

Counsel for the appellant and Mr. Muhammad Asif Masood, DDA alongwith Muhammad Murtaza, Superintendent for the respondents present.

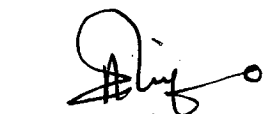
Learned AAG seeks time for preparation. Request is accorded. To come up for arguments on 30.03.2022 before the D.B.


(Salah-ud-Din)
Member(J)


Chairman

30-3-2022

Proper DB not available the case is adjourned to come up for the same as before on 6-6-2022



Reader


02.12.2020

Counsel for appellant present.

Riaz Paindakhel learned Assistant Advocate General for respondents present.

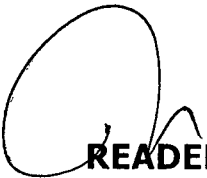
Former requests for adjournment as issue involved in the present case is pending before a Larger Bench of this Tribunal. Adjourned. To come up for arguments on 01.03.2021 before D.B


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


(Rozina Rehman)
Member (J)

01.03.2021


Due to COVID-19, the case is adjourned for the same on 01.06.2021 before D.B


READER

01.06.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Former sought adjournment on the ground that similar issue involved in the instant appeal is pending before a Larger Bench of this Tribunal, therefore, Adjourned. To come up for arguments before the D.B on 02.08.2021.


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


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

03-4 .2020

Due to COVID19, the case is adjourned to
06/8/2020 for the same as before.



Reader

06.08.2020

Due to summer vacation case to come up for the same on
08.10.2020 before D.B.




Reader

08.10.2020


Counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General
for respondents present.

Learned AAG made a request for adjournment in order to
produce record/inquiry report. Adjourned. To come up for
record/arguments on 02.12.2020 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

06.01.2020

Learned counsel for the appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Fawad Afzal, Senior Clerk for respondents present. Representative of the respondents seeks time for submission of enquiry record. Adjourn. To come up for enquiry record and arguments on 04.02.2020 before D.B.


Member


Member

04.02.2020

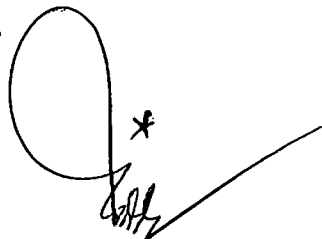
Due to general strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Muhammad Tariq, Assistant for the respondents present. Case to come up for inquiry record mentioned in order sheet dated 21.11.2019 and arguments on 09.03.2020 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

09.03.2020

Counsel for the appellant present. Addl: AG for respondents present. Enquiry record not submitted. Respondents are strictly directed to produce enquiry report mentioned in order sheet dated 21.11.2019 positively on the next date of hearing. Adjourned. To come up for record and arguments on 03.04.2020 before D.B.

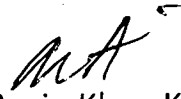

Member


Member

17.10.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned Assistant AG requested for adjournment. Adjourned to 21.11.2019 for arguments before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

21.11.2019

Learned counsel for the appellant present. Mr. Riaz Paindakheil learned Assistant Advocate General for the respondents present. Learned Asst: AG requested that the inquiry report is not available on record, therefore, the same may be requisitioned. Respondents are directed to direct the representative to attend the court and furnished the relevant inquiry record on the basis of which the appellant was terminated vide order dated 11.12.2015 positively on the next date. Adjourned. To come up for record and arguments on 06.01.2020 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

30.01.2019 Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney alongwith M/S Bahadur Computer Operator and Daud Jan Superintendent present. Adjournment requested. Adjourn. Adjourn. To come up for arguments on 14.03.2019 before D.B.


Member


Member

14.03.2019 Junior for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Junior counsel for the appellant seeks adjournment on the ground that learned senior counsel is not available today. Adjourn. To come up for arguments on 29.03.2019 before D.B.

(M. AMIN KHAN KUNDI)
MEMBER


(M. HAMID MUGHAL)
MEMBER

29.3.2019. The bench is incomplete, therefore
the case is adjourned to 14-5-19


Reader

14-5-19 The bench is incomplete, therefore
the case is adjourned to 16-10-19


Reader

16-10-19 The bench is incomplete therefore
the case is adjourned to 17-10-19


Reader

27.09.2018

As per order of worthy chairman in service appeal No, 296/16 Sakhi Akbar vs Secretary Education etc, this case be fixed before the bench comprising of Mr Mohammad Hamid Mughal learned Member (J) & Mr Ahmad Hassan learned Member (E) for hearing and disposal *am 1-11-2018*


Registrar

01.11.2018

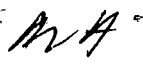
Due to retirement of Hon'able Chairman, the Tribunal is defunct. Therefore, the case is adjourned for the same on 03.12.2018 before D.B.


Reader

03.12.2018

Junior counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for arguments on *23*.01.2019 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

02.01.2019


Learned counsel for the appellant and Mr. Riaz Paindakheil learned Assistant Advocate General alongwith Sarwar Khan ADEO present. Representative of the respondents seeks time to furnish complete record. Granted. To come up for record and arguments on 30.01.2019 before D.B.


Member

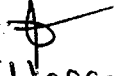

Member

31.08.2018 Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. Adjourned. To come up for order on 18.09.2018.


(Ahmad Hassan)
Member

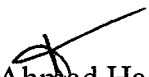

(Muhammad Amin Khan Kundi)
Member

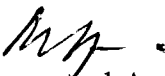
18.09.2018 Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. Adjourned. To come up for order on 27.09.2018.:


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

27.09.2018 Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. The case was fixed for order, however, Judicial Member want to submit that perusal of the file reveal that on 23.04.2018 the bench comprising of Mr. Muhammad Hamid Mughal and Mr. Ahmad Hassan heard the arguments in all connected appeals including the present appeal but decided only five appeals out of total connected appeals and adjourned the remaining connected appeals including the present appeal for arguments. Propriety demand that the bench comprising above named members should also decide the remaining connected appeals including the present one. Hence, the case file be put up today before the learned Chairman of Service Tribunal for appropriate orders.


(Ahmad Hassan)
Member (E)


(Muhammad Amin Kundi)
Member (J)

Service Appeal No. 301/2016

29.06.2018

Appellant with counsel present. Mr. Kaibrullah Khattak, Additional AG alongwith Mr. Ahmad Khan, Agency Education Officer and Mr. Daud Jan, Superintendent for the respondents present and requested for adjournment. Adjourned. To come up for arguments on 17.08.2018 before D.B.



(Muhammad Amin Kundi)
Member


(Muhammad Hamid Mughal)
Member

17.08.2018

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 28.08.2018 before D.B.


(Muhammad Amin Kundi)
Member


(Muhammad Hamid Mughal)
Member

28.08.2018

Appellant with counsel and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Ahmad Khan, Additional Agency Education Officer and Mr. Daud Jan, Superintendent for the respondents present. Arguments heard. To come up for order on 31.08.2018.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

28.05.2018

Bench is incomplete. To come up for order on 31.05.2018 before D.B


Member

31.05.2018

Learned Additional Advocate General present. Some points needs consideration. Learned counsel for the appellant is not available. Adjourned. To come up for further arguments on 07.06.2018 before D.B


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

07.06.2018

Junior to counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Daud Jan ADO for the respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel is not in attendance. Adjourned. To come up for arguments on 29.06.2018 for arguments before D.B.


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

10.04.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Last opportunity granted. To come up for record and arguments on 23.04.2018 before the D.B.


Member


Chairman

23.04.2018

Learned counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General alongwith Ahmad Khan AEO for the respondents present. Arguments heard. To come up for order on 09.05.2018 before D.B.


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

09.05.2018


The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come on 28.05.2018


READER

08.02.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Superintendent for the respondents present. Due to shortage of time, arguments could not be heard. To come up for record and arguments on 29.03.2018 before the D.B.


Member


Chairman

29.03.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Adjourned. To come up for record and arguments on 04.04.2018 before D.B.



Member


Chairman

04.04.2018

Counsel for the appellant and Addl; AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for record and arguments on 10.04.2018 before D.B.

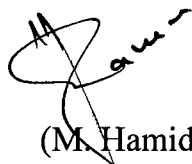

(Ahmad Hassan)
Member


(M. Hamid Mughal)
Member

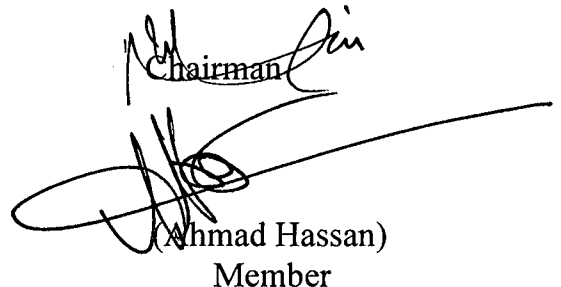
17.08.2017

Junior to counsel for the appellant and Asstt. AG
alongwith Daud Jan, Superintendent for the respondents
present.

Since the matter in controversy has already been
resolved by the judgment of Hon'ble Peshawar High Court
reported as PLD 2014-Peshawar-132, there is no need to
decide this issue any further. The matter may be put up
before the D.B for decision on merits. To come up for
arguments before the D.B on 29.11.2017.



(M. Hamid Mughal)
Member



Chairman
Ahmad Hassan
Member

29.11.2017

Counsel for the appellant Mr. Ziaullah, DDA
alongwith Mr. Daud Jan, Supdt for the respondents present.
Representative of the respondents is directed to bring
enquiry report and other documents. To come up for such
record and arguments on 08.02.2018 before the D.B.



Member



Chairman

07.03.2017

Counsel for the appellant and Addl: AG for respondents present. Rejoinder submitted. To come up for arguments on 10.07.2017 before D.B.




(ASHFAQUE TAJ)
MEMBER



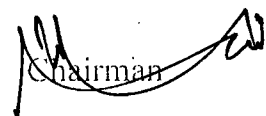
(MUHAMMAD AAMIR NAZIR)
MEMBER

10.07.2017

Counsel for the appellant and Muhammad Jan, Government Pleader for the respondents present. Vide our detailed order of to-day in service appeal No. 261/2016, entitled "Hamid Ullah Khan Versus Director of Education FATA, FATA Secretariat, Peshawar and others" a special bench of 3 members is constituted in which Mr. Muhammad Hamid Mughal, Learned Member (Judicial) shall also be included in addition to the present bench. To come up for arguments on the point of jurisdiction on 17.08.2017.



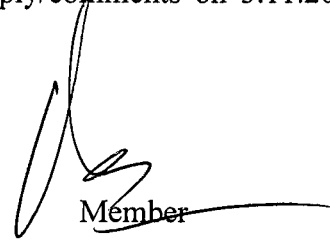
Member



Chairman

24.08.2016

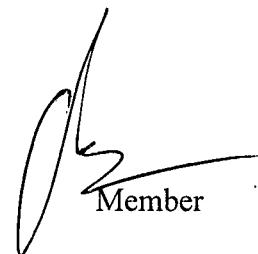
Clerk to counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl. AG for respondents present. Written reply not submitted. . Requested for further adjournment. Last opportunity is extended. To come up for written reply/comments on 3.11.2016 before S.B.



Member

03.11.2016

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for further adjournment. Another last opportunity is extended. To come up for written reply/comments on 12.01.2017 before S.B.



Member

12.01.2017

Counsel for the appellant and Mr. Daud Jan, Superintendent alongwith Additional AG for respondents present. Written statement by respondents No. 2 & 3 submitted. Learned Additional AG relies on the same on behalf of respondents No. 1 & 4. The appeal is assigned to D.B for rejoinder and final hearing for 07.03.2017 before D.B.



Chairman

14.4.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as C.T (BPS-15) GHS Kochi Kuram Agency when terminated from service vide impugned order dated 11.12.2015 on the allegations of irregularities in his appointment where-against he preferred departmental appeal on 18.12.2015 which was not responded and hence the instant service appeal on 28.03.2016.

That appointment of the appellant was made in accordance with provisions of Rule-10 of Khyber Pakhtunkhwa Civil Servants (Appointments, Promotion and Transfer) Rules, 1989 and that there was neither any illegality nor irregularity in the said appointment and, moreover, neither any enquiry was conducted nor any opportunity of hearing extended to the appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 15.06.2016 before S.B.

Appellant Deposited
Security & Process Fee


Chairman

15.06.2016




Counsel for the appellant and Asstt. AG alongwith Daud Jan, Supdt. for the respondents present. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 24.08.2016 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 301/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.03.2016	<p>The appeal of Mr. Farooq Muhammad presented 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	29.3.16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>12.4.16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	12.04.2016	<p>Junior to counsel for the appellant present. Seeks adjournment. Case is adjourned for preliminary hearing to 26.4.2016.</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 301 /2016

FAROOQ MOHAMMAD VS EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
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2.	Appointment order	A	5.
3.	Charge report	B	6.
4.	Medical certificate	C	7.
5.	Disability certificate	D	8.
6.	Advertisement	E	9.
7.	Appointment order	F	10.
8.	Charge report	G	11.
9.	Service certificate	H	12.
10.	Service book	I	13- 18.
11.	Educational testimonials	J	19- 28.
12.	Memo of writ petition	K	29- 35.
13.	Impugned order	L	36- 37.
14.	Departmental appeal	M	38- 39.
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APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 301 /2016

K.W.P. Province
Service Tribunal
Diary No. 278
Date 28-3-2016

Mr. Farooq Mohammad, Ex: C.T (BPS-15),
Govt: Middle School Taudy Oby, Kurram Agency..... **APPELLANT**

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat, Warsak Road, Peshawar.
- 2- The Director of Education FATA, FATA Secretariat, Warsak Road, Peshawar.
- 3- The Additional Agency Education Officer, Lower & Central Kurram Agency at Sadda.
- 4- The Agency Account Officer, Kurram Agency.

..... **RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 11.12.2015 WHEREBY THE SERVICES OF THE APPELLANT HAS BEEN TERMINATED WITH EFFECT FROM THE DATE OF HIS APPOINTMENT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINTY DAYS.

PRAYER:

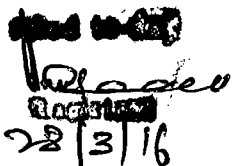
That on acceptance of this appeal the impugned order dated 11.12.2015 may be set aside and the respondents may be directed to re-instate the appellant with all back benefits w.e.f the date of his appointment. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That initially the appellant was appointed in the respondent Department as PST on contract basis vide order dated 12.10.2009. That later on the services of the appellant were regularized vide Notification dated 14.5.2013. Copies of the first appointment order, charge report, medical certificate and disability certificate are attached as annexure **A, B, C & D.**
- 2- That the respondent No.3 through advertisement published in the Daily News Paper advertised various posts including


28/3/16

the post of C.T (BPS-09) now (BPS-15). Copy of the advertisement is attached as annexure **E.**

- 3- That appellant having the Domicile of Kurram Agency and having the requisite qualifications for the said post applied through proper channel and after participated in the test and interview the appellant was declared successful in the said selection process. That in consequence the appellant was offered the said post through appointment order dated 18.01.2013. Copies of the appointment order, charge report, Medical certificate, service book and Education Testimonials are attached as annexure **F, G, H, I & J.**
- 4- That in response the appellant started performing his duty at the concern station quite efficiently and up to the entire satisfaction of his superiors.
- 5- That the service book of the appellant is also been prepared by the respondent No.3 and proper entry regarding the appointment of the appellant has been made by the respondent No.3 in the said service book of the appellant. That astonishingly right from appointment the salaries of the appellant has been withheld by the respondents without assigning any reason and clear justification. Copy of the service book is already attached as annexure---- **I.**
- 6- That appellant time and again visited the concerned quarter for the release of his salaries but of no avail, feeling aggrieved from the inaction of the respondents by not releasing the monthly salary of the appellant the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. W.P. 3602-P/2014 which is still pending adjudication before the august Peshawar High Court Peshawar. Copy of the Memo of writ petition No WP 3602-P/2014 is attached as annexure **K.**
- 7- That astonishingly the respondent No.3 issued the impugned order dated 11.12.2015 whereby the services of the appellant has been terminated with retrospective effect without conducting regular inquiry and without assigning any reason/clear justification. Copy of the impugned order dated 11.12.2015 is attached as annexure **L.**
- 8- That appellant feeling aggrieved from the impugned order dated 11.12.2015 filed Departmental appeal on 18.12.2015 before the respondent No.2 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure **I.**

GROUND:

- A- That the impugned order dated 11.12.2015 issued by the respondent No.3 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- 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 appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015.
- D- That no show cause notice has been served on the appellant by the respondent Department before issuing the impugned order dated 11.12.2015 against the appellant.
- E- That no regular inquiry has been conducted before issuing the impugned order dated 11.12.2015.
- F- That no chance of personnel hearing/personnel defense has been given to the appellant before issuing the impugned order dated 11.12.2015.
- G- That the impugned order dated 11.12.2015 has been issued by the respondents in violation of the principle of Locus Poenitentiae.
- H- That appellant has successfully completed his probationary period and has served the respondent Department for more than three years but inspite of that the respondent No.3 issued the impugned order dated 11.12.2015.
- I- That the respondent Department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 against the appellant.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 19.3.2016

APPELLANT

Farooq

FAROOQ MOHAMMAD

THROUGH:

NK

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

(0345-9383141)

PST

A-5

APPOINTMENT

Consequent upon the approval by the Selection Committee, the appointment of the following PTC Male teachers is hereby ordered in the schools noted against their names against vacant PTC posts purely on contract basis in BPS No.7/BPS No.9 (If passed FA/FSC Examination in 2nd Division plus usual allowances as admissible under the rules with effect from the date of their taking over charge.

S #	Name of Candidate/Father,s Name	School Where Appointed	Remarks
1	Salim Khan S/O Khan Sahib	GPS Shandwani CK	Against vacant post
2	Muhammad Shafiq S/O Shundi Gul	GPS Tanorak CK	Against vacant post
3	Nek Muhammad S/O Lal Muhammad	GPS Somana CK	Against vacant post
4	Farooq Muhammad S/O Arab Gul	GPS Awad CK	Against vacant post
5	Ihsanul Haq S/O Muhammad Jan	GPS Tatrai CK	Against vacant post
6	Gulab Hussain S/O Noor Hussain	GPS Ormagai CK	Against vacant post
7	Nawroz Khan S/O Nasir Khan	GPS Mirdo Tang CK	Against vacant post
8	Sajid Gul S/O Rehmat Gul	GPS Daya CK	Against vacant post
9	Eidu Rehman S/O Talooth Khan	GPS Tindo N/Kali CK	Against vacant post
10	Azizu Rehman S/O Syed Rehman	GPS Narari CK	Against vacant post
11	Hujmir Khan S/O Ajmir Khan	GPS Khuram CK	Against vacant post
12	Muhammad Umar S/O Gul Bat Khan	GPS Neka Ziarat CK	Against vacant post
13	Gul Janan S/O Sardar Khan	GPS Sandaghar CK	Against vacant post
14	Liaqat Ali Khan S/O Hibat Khan	GPS Tarali CK	Against vacant post
15	Aurangzeb Khan S/O Nazir Khan	GPS Zarana CK	Against vacant post
16	Rehmat Khan S/O Gulbat Khan	GPS Kemal Baza CK	Against vacant post
17	Noor Ahmad Shah S/O Rehmat Shah	GPS Sam Khakak CK	Against vacant post
18	Noor Muhammad Khan S/O Hayat Shah	GPS Surmai CK	Against vacant post

TERMS/CONDITIONS

1. They are directed to produce their Medical certificates from the Medical Supdt AHQ Hospital Parachinar.
2. Their age should be between 18-33 years for Male and 18-40 years for female candidates.
3. Their appointment is purely made on temporary and contract basis and liable to termination at any time without assigning any notice, in case they want to resign their posts, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. Their appointment will be considered as regular but without pension/gratuity on the term of section-15 of the NWFP Civil servants Act 1973, as amended with Civil servants amendment Act 2003 but will be entitled to contribution provident fund at such rate as may be prescribed by the Govt.
5. No payment will be made to the appointees until and unless their academic and professional certificates are got verified from the Issuing Authorities concerned.
6. If they failed to take over charge within 15 days, their appointment will automatically be considered as cancelled.
7. Charge reports should be submitted to this office.

No. 8231-30/Edu Dated 12/10/2009

Copy forwarded to the.

1. Director of Education FATA NWFP Peshawar.
2. Political Agent Kurram Agency.
3. Asstt Political Agent Upper Kurram.
4. Agency Accounts Officer Kurram
5. Principals/Headmasters/Teachers concerned.

Fikhar Aman
Agency Education Officer
Kurram Agency Parachinar

Fikhar Aman
Agency Education Officer
Kurram Agency Parachinar

ATTESTED

[Signature]

CHARGE REPORT

B-6

Mr/Miss Farooq Mohd S/O, D/O Arab Gul

Have taken of the charge of P. T. G post at G. P. S
Awad Central Kurram on 13-10-2009

Fore Noon /After Noon vide Agency Education Officer Kurram Agency.

Endst: No 8231-50 /Edu dated 12-10-2009

Signature of Receiving Farooq Mohd Signature of Relieved _____
Govt: Servant Govt: Servant _____

NO _____ /Dated _____ /2009.

Ullah
Head Teacher
G.P.S. Audh Killi
F.R. Kurram Agency

- Copy to the:-
1. Agency Education Officer Kurram Parachinar.
2. Agency Account Officer Kurram Parachinar.
3. AAEO Local Office Sadda Ck & LK.
4. Office file record.

CHARGE REPORT

Mr/Miss Farooq Mohd S/O, D/O Arab Gul

Have taken of the charge of P. T. G post at G. P. S
Awad Central Kurram on 13-10-2009

Fore Noon /After Noon vide Agency Education Officer Kurram Agency.

Endst: No 8231-50 /Edu dated 12-10-2009

Signature of Receiving Farooq Mohd Signature of Relieved _____
Govt: Servant Govt: Servant _____

NO _____ /Dated _____ /2009.

Ullah
Head Teacher
G.P.S. Audh Killi
F.R. Kurram Agency

- Copy to the:-
1. Agency Education Officer Kurram Parachinar.
2. Agency Account Officer Kurram Parachinar.
3. AAEO Local Office Sadda CK & LK.
4. Office file record.

ATTESTED
||

C-7

MEDICAL CERTIFICATE.

Name of Official..... Mr. Farooq Mohammad.

Caste or race..... Masso Zai.

Father's name..... Mr. Arab Gul.

Residence..... Village OUD (PR) Kurram Agency.

Date of Birth..... 1-5-1983

Exact height by measurement..... 5'5"

Personal mark of identification..... Lt. Leg. paralysed - P.P.P.

Signature of the Official..... *[Signature]*

Signature of head of office.....

Seal of Office.....

I do hereby certify that I have examined Mr. Farooq. Mohammad candidate for employment in the Office of the Education and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except..... Nil - P.P.P. Lt. Leg.

I do not consider this as disqualification for employment in the office of the Education As P.T.C. His age according to his own statement (24) ... year and by appearance about..... Twenty one years.

ATTESTED

[Signature]

[Signature]

LEFT HAND THUMB AND FINGER IMPRESSIONS.....

Medical Superintendent, Civil Hospital.....

[Signature]

Disability Certificate

D-8

GS&PD. NWFP.--846 D.M.P.T--30,000--29-11-82-- (31)



NCRDP

Form-2

INDEX CARD OF THE DISABLED PERSONS EMPLOYMENT EXCHANGE.

Name in full. FAROOQ MUHAMMAD.. Registration No. 577/DP/10
Father's Name ARAB GUL..... Dated 17/12/2010.
Qualification .. B.A.

Specimen Signatures of the
Disabled or thumb impression

Farooq M. d.

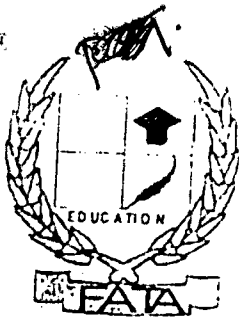
Signature of the Attesting Officer.



Manager, Exchange
Peshawar Exchange,

ATTESTED

[Signature]



C.T

F-10

ADD: AGENCY EDUCATION
OFFICE SADDA KURRAM AGENCY.

PHONE. 0926-520674 FAX 0926520674

No. _____/Edu:

Dated Sadda: the ____/____/2013

APPOINTMENT.

Consequent upon the approval by the Selection Committee, the appointment of the following CT teachers are hereby ordered in the school noted against their names against vacant CT posts purely on Regular contract basis in BPS No 9 Plus usual allowances as admissible under the rules with effect from 01.03.2013

S #	Name of Candidate	Father Name	School where Appointed	Remarks
1	Ishaq Khan	Malik Jan	GMS Ossai	Against Vacant Post
2	Muhammad Haleem	Muhammad Nazir	GHS Paloseen	----do----
3	Ayaz Khan	Noor Hussain	GHS Minatoo	----do----
4	Abdur Rehman	Eida Khan	GMS Samkhakak	----do----
5	Hussain Ahmad	Muhammad Rafiq	GMS Jilamy CK	----do----
6	Syed Hassan	Muhammad Hassan	GMS Tarai	----do----
7	Ismail Khan	Abdul Habib	GHS Badama	----do----
8	Ferooz Khan	Gul Zam Khan	GHS Baza	----do----
9	Taj Ahmad	Lal Muhammad	GMS Gandaw	----do----
10	Farooq Muhammad	Arab Gul	GMS Taudy Oby	----do----
11	Sabir Gul	Noor Gul	GMS Samkhakak	----do----
12	Aziz ur Rehman	Sayed Rehman	GMS Jilamy CK	----do----
13	Muhammad Ayaz	Gul Karim	GHS Paloseen	----do----
14	Ajab Khan	Gul Muhammad	GHS Baza	----do----
15	Muhammad Saeed	Zar Bat Khan	GHS Baza	----do----
16	Muhammad Siddique	Abdul Rashid	GMS Ossai	----do----
17	Latif Hussain	Inam Hussain	GHS Anguri	----do----

TERMS/CONDITIONS.

1. They are directed to produce their Medical certificate from the Medical Supdt:AHQ Hospital Sadda Kurram Agency
2. Their age should be between 18-35 years.
Their appointment is purely made on temporary and Regular contract basis and liable to termination at any time without assigning any notice, in case they want to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
3. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the Issuing Authorities concerned.
4. If they failed to take over charge within 15 days, their appointment will automatically be considered as cancelled.
5. Charge reports should be submitted to this office.
7. Their appointment will be consider as regular but without Pension/gratuity on the term of section-15 of the KPK Civil Servant Act 1973 as amended with civil servants amendment Act: 2003 but will be entitled to contribution Provident Fund at such rate as may be prescribed by the govt.

Add: Agency Education Officer
Lower & Central Kurram Sadda.

No 156-77 / Edu Dated 15/1 /2013
Copy forwarded to the.

1. Director of Education FATA KPK Peshawar.
2. Agency Account officer Parachinar.
3. Political Agent Kurram Parachinar.
4. Asstt: Political Agent Central Kurram.
5. Teachers Concerned.
6. Headmaster concerned.
6. Office file.

ATTESTED

Add: Agency Education Officer

CHARGE REPORT

G-11

I Mr/Miss Farooq Muhammad SIO Arab Gul

Have taken of the charge of CoT Post BPS 09

at Go.M.S Tawdi oby on 17-01-2013

Fore Noon vide Add:AEO Enc:No 156-77 dated 15-01-2013

Signature of Receiving
Govt:Servant [Signature]

Signature of Relieved
Govt:Servant [Signature]
**HEAD MASTER
GMS Tawdi Oba
Central Kurram**

[Signature]
Add: Agency Education Officer
Sadda Kurram Agency

CHARGE REPORT

I Mr/Miss Farooq Muhammad SIO Arab Gul

Have taken of the charge of CoT Post BPS 09

at Go.M.S. Tawdi oby on 17-01-2013

Fore Noon vide Add:AEO Enc:No 156-77 dated 15-01-2013

Signature of Receiving
Govt:Servant [Signature]

ATTESTED

[Signature]

Signature of Relieved
Govt:Servant [Signature]
**HEAD MASTER
GMS Tawdi Oba
Central Kurram**

[Signature]
Add: Agency Education Officer

OFFICE OF THE SMO INCHARGE THQ HOSPITAL SADDA KURRAM AGENCY.
HEALTH AND AGE CERTIFICATE

Name of Official, MR. FAROOQ MUHAMMAD

H - (12)

Father Name, ARAB GUL

Date of Birth, 01/05/1983

Residence, VILLAGE AUDH P/O SADDA & TEHSIL CENTRAL KURRAM
AGENCY

Cast of Race, MASOZAI

Exact Height by measurement, 5 FEET 7 INCH

Personal mark of identification, NIL

Signature of Official, [Signature]

Signature of head of the Office, _____

Seal of Office

It is certified that I examined, MR. FAROOQ MUHAMMAD S/O ARAB GUL

Candidate for employment in the Office of the ADD. AGENCY EDUCATION

DEPARTMENT LK & CK and cannot discover that he has any communicable Diseases OR

Other mentally & physically abnormality but the person in PPP (Post Polio Paralysis) in left leg but now the person is fit for teaching job .therefore I do not consider this disqualification

for employment in the office of the ADD. AGENCY EDUCATION DEPARTMENT LK & CK.

His age is according to his CNIC & School leaving Certificate is (29Years 9 Months) and by appearance about (30 Years).

ATTESTED

LEFT HAND THUMB AND
SIGNATURE IMPRESSION.

1 _____ 2 _____ 3 _____ 4 _____ 5 _____

[Signature]
SMO Incharge THQ
Hospital SADDA
Dated, 2-2-2013
INCHARGE
T.H.Q. Hospital
Sadda Kurram Agency

[Signature] 25/2/13
Countersigned,
Medical Superintendent
Agency Hospital

Heirs:

1. Passed S.S.C Exam from B-I-S-E Peshawar
Under Roll No 166010 Session 1998 marks obtained
out of 850 in grade B.
2. _____
3. _____

Verification Roll No. _____ dated _____ received back

Passed F.Sc Exam from BISE Peshawar
under Roll No: 633 Session 2000(s) marks
obtained 575/1100 in grade C result declared
10.12.2001.

Left Thumb Impression

Passed B.A Exam from University of Peshawar
under Roll No: 72493 Session 2006 marks obtained
247/550 in 2nd Division result declared date
30.9.2006

Qualification	Date	Qualification	Date
passed D.I.E from director of Education Curriculum & Teachers Education Abbottabad under R: No 168 Session 2006-07 marks obtained 972/1500 declaration of result 15-12-2007		First Arts	
Pushto		B.L. Or B.A.	
Urdu		Pleadership examiantion	
Plan-drawing		Training School Final examiantion	
passed B.Ed Exame from Comal Finger Print University D.I Khan session - 2008-2009 under Roll No 5227 marks obtained - 705/1100.		Other qualification:—	
Drill Instructing			
Court Duties			
Reserve Duties			

Add: Add: Sadda Kurram

Add: Add: Sadda Kurram

ATTESTED

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

1. Name: Farooq Muhammad (14)

2. Race: Masrozi

3. Residence: village Audh Central Kurram Agency

4. Father's name and residence: Arab Gul

5. Date of birth by Christian era as nearly as can be ascertained: 1st may N.H Eighty Three
01-05-1983

6. Exact height by measurement: 5' 5"

7. Personal marks for identification: Nil

8. Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb



ATTESTED


9. Signature of Government Servant: Jaweed

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

Agency Education Officer
Kurram Agency Parachinar

15

Signature of Government Servant.

Name of post	Whether substantive or officiating and whether permanent or temporary	(i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'A.P.'	Date of appointment	Signature of Government Servant.
P.T.C Project Post emms Bemdaghvan C.K	066/Temp			3166/- Fixed ✓		15 ⁵ / ₂₀₀₈	Haroon Md
N		2555-140-6755)		3166/- Fixed ✓		1 ¹² / ₂₀₀₈	Haroon Md
BPS-7C		2555-140-6755)					
N	N			2555/- ✓ 2255/-	1 ⁷ / ₂₀₀₅	1 ⁷ / ₂₀₀₅	Haroon Md
N	N			2555/- ✓ 2255/-		1 ¹² / ₂₀₀₅	Haroon Md
N	N			2555/- ✓ 2255/-		1 ¹² / ₂₀₀₅	Haroon Md
N		<u>BPS-7C(2940-160-7740) 2940/-</u> ✓				1 ⁷ / ₂₀₀₇	Haroon Md
N	N			2940/- ✓		1 ¹² / ₂₀₀₇	Haroon Md
ATTESTED 		N BPS-7C(3530-190-9230)		3530/- ✓		1 ⁷ / ₂₀₀₈	Haroon Md
	N	<u>BPS-7C(3820-230-10720)</u>		3720/- ✓		1 ¹² / ₂₀₀₈	Haroon Md
						12-10	Haroon Md

9	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 debitale to another Government.		
Signature of the head of the office or other attesting officer.	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 debitale	Signature of the head of the office or other attesting officer	Reference to an recorded part of merit or certificate or praise of the Government Servant.
2004	30/11/2004	Final	Amin Amir AEO KURRAM		Appointed as PIC Project Post at GMS Sandoghar C.K vide AEO Kurram Endst No 2877-2934 Dated 15-05-2004	Amin Amir	
2005	30/2005	Pay Revision	Amin Amir		Agency Education Kurram Agency Peshawar	Amin Amir	
2005	30/11/2005	no one					
2006	30/11/2006	no one			Service verified w.e.f 15-05-2004 to 30-11-2004 from the office record.		
2007	30/11/2007	Pay Revision			Service verified w.e.f 1-12-2006 to 30-11-2007 from office record.		
2008	30/11/2008	no one					
2008	30/11/2008	Pay Revision			Service verified w.e.f 1-12-2007 to 30-11-2008 from office record.		
2009	30/11/2009	Inc:					
2009	12/10/2009	APPH: as PTE-regular Post.			Appointed as PTE regular Post at GMS Avadh C.K vide A.E.O No: 8231-S dated: 12-10-2009		


16

ATTESTED

2009

2009

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant
P.T.C Post at eps Anah e.k	Temp/off		3820/-			1 ¹² / ₂₀₀₉	Farooq Me
do	do		4050/-			1 ¹² / ₂₀₁₀	Farooq Me
do	do	BPS-9 (5200-380-17600)	6580/-			1 ⁷ / ₂₀₁₁	Farooq Me
do	do		6960/-			1 ¹² / ₂₀₁₁	Farooq Me
do	do		7340/-			01 ¹² / ₂₀₁₂	Farooq Me
							Farooq Me
							Farooq Me
							Farooq Me
							Farooq Me
							Farooq Me

ATTESTED


9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	1 Referenc recorded ment or or prais Govern Serv	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitab to another Government			
					Period			Government to which debitab
<i>[Signature]</i>	30/11/2010	Jnc:	<i>[Signature]</i>		Service Verified w.e.f. 1-12-2006 to 30-11-2007 from this office record.	(18)		
<i>[Signature]</i>	30/6/2011	Pay Revision	<i>[Signature]</i>		Agency Education Officer Kuram Agency Parachinar			
<i>[Signature]</i>	30/11/2011	Jnc:	<i>[Signature]</i>		Service Verified w.e.f. 13/10/2010 to 30/11/2011 from This Office Record			
<i>[Signature]</i>	30/4/2012	Jnc:	<i>[Signature]</i>				Add: A.I	
<i>[Signature]</i>							Service Verified to 30/11/2011 from This Office Record	
<i>[Signature]</i>							Add: A.I Sudda Kur	
<i>[Signature]</i>							Service Verified w.e.f. to 30/4/2012 from This Office Record	
<i>[Signature]</i>							Add: A.I Sudda Kur	
<i>[Signature]</i>								

ATTESTED

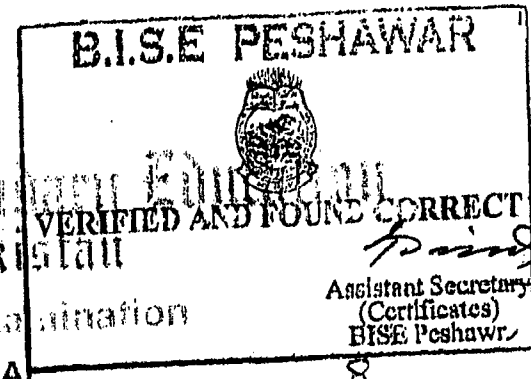
[Signature]

Matric

S.No. 10536

Roll No. 166010

J-19



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 1998 - ANNUAL
 (Science Group)

Assistant Secretary
 (Certificates)
 BISE Peshawar

23-7-14
 2247124

This is to Certify that Farooq Muhammad Son / Daughter of Arab Gul
 and a student of Frontier Children Academy Hayatabad, Peshawar has passed the Secondary School Certificate
 Examination of the Board of Intermediate and Secondary Education, Peshawar held in May/June 1998 as a Regular
 candidate. He / She obtained 571 Marks out of 850 and has been placed in Grade B Representing Very Good

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Chemistry |
| 2. Urdu | 4. Pakistan Studies | 6. Physics | 8. Biology |

He / She has been awarded Grade B on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form May 1, 1983

[Signature]
 Assistant Secretary

[Signature]
 Secretary

ATTESTED

This certificate is granted without alteration or abridgement

[Signature]

S. No. PB 99904

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(SCIENCE GROUP)

Session 19 98 (Annual/Supplementary)

Name Farooq Muhammad

Father's Name Muhammad Iqbal Roll No. 166010

SUBJECT	Total Number of marks allotted	MARKS OBTAINED			
		Theory	Practical	In Figure	In Words
1. English	150			126	
2. Urdu	150			97	
3. Islamiyat	75			57	
4. Pakistan Studies	75			48	
5. Mathematics	100			55	
6. Physics	100	51	16	67	
7. Chemistry	100	51	15	66	
8. Biology	100	41	14	55	
Total	850			571-13	Five Hundred & Seventy one

Note: Errors/Omissions excepted
F: Failed in the paper (s)

Prepared by: JH DC

Checked by: _____

Date 27/8 1998

ATTESTED

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

FSC

S.No. 74128

Roll.No. 633

Group Pre-Medical

پشاور



21

Board of Intermediate and Secondary Education Peshawar N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION SESSION 2000 - SUPPLEMENTARY

This is to Certify that Farooq Muhammad Son of Arab Gul

and a resident of Kurram Agency Registered No. 136-B/PMDC-98

has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar held in November, 2000 as a Private Candidate. He obtained 575 Marks out of 1100 and has been placed in Grade C Representing Good. He has been awarded Grade - on the basis of internal assessment by the institution concerned. The Examination was taken in parts.

Asstt. Secretary

ATTESTED

Secretary

This certificate is issued without alteration or erasure.

GRADING FORMULA

Maximum Marks 1100

Percentage of Marks

Grades

Remarks

80% and above

A One 880 and above

Outstanding

70% and below 80%

A 770 to 879

Excellent

60% and below 70%

B One 660 to 769

Very Good

50% and below 60%

C 550 to 659

Good

40% and below 50%

D 440 to 549

Fair

Below 40% and Minimum Pass Marks

E 439 and below

Satisfactory

UI

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar

(Pakistan)

22

Session ANNUAL 2006

FAROOQ MUHAMMAD Son / ~~Daughter~~ of ARAB GUL

DISTRICT PESHAWAR

JUNE 2006

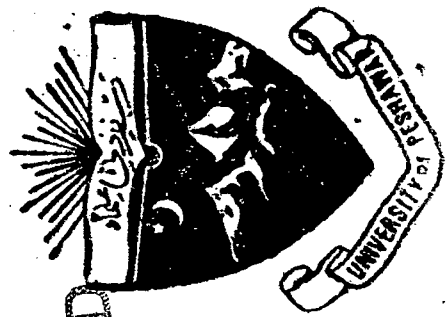
and a student/private candidate of
having passed the prescribed examination held in

is this day admitted by the University of Peshawar to the Degree of

Bachelor of Arts

in SECOND Division

The Examination was taken as a whole / ~~in parts~~



Serial No 0118100

Registration No. 2005-PC-1280

Roll No. 72493

Result declared on 30TH SEPTEMBER, 2006

[Signature]
Registrar

Countersigned
M. Javed Khan
Vice-Chancellor



UNIVERSITY OF PESHAWAR

1979
(PAKISTAN)

Roll No.
724935

Registration No.
2005-PC-1280

Detailed Marks Certificate
Bachelor of Arts (Part-II), Annual Examination-2006
Private Candidate Appeared from Hayatabad-Peshawar

23

Name: **Farooq Muhammad**

Father's Name: **Arab Gul**

Certified that the candidate secured the following marks and is placed in **Second** division

SUBJECTS / PAPERS	Maximum Marks Allowed	Marks Obtained	
		In Figures	In Words
English (Compulsory)	75	27	Twenty Seven
Pakistan Studies	40	23	Twenty Three
Political Science	75	32	Thirty Two
Sociology	75	30	Thirty Only
Total:	285	135	One Hundred and Thirty Five

Checked with record & found correct
 DMC Assit: *[Signature]*
 Programmer Secretary
 Countersigned

[Handwritten Signature]
 Head Master
 G.M.S Saadaghar
 Central Kurram Agency

[Signature]
 Controller of Examinations
 University of Peshawar

Errors & omissions are subject to subsequent rectification

The Examination was taken as a whole

Declaration Date 30th September 2006

Prepared by *[Signature]*

ATTESTED

[Signature]
 Controller of Examinations
 University of Peshawar

24

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE Intermediate Examination (Pre-Medical Group)



S. No: PBPM-II 55416

Part - II

Session 18 2000 (Annual / Supplementary)

Name: Farooq Mohamud
Father's Name: Arab Gul Roll No. 63

SUBJECT	Marks Allotted			Marks Obtained					REMARKS	
	Part-I	Part-II		Part-I		Part-II				
		Theory	Practical	Total	Theory	Practical	Theory	Practical		Total
1. English	100	100	-	200					101	
2. Urdu	100	100	-	200					114	✓
3. Islamic Education	50	-	-	50					64	✓
4. Pakistan Studies	-	50	-	50						✓
5. Biology (Zoology)	100	75	25	200					110	✓
6. Physics	100	75	25	200					106	✓
7. Chemistry	100	75	25	200					80	✓
Total	550	475	75	1100					575	✓

Note: Errors/Omissions excepted

Total Marks in Words Five hundred & Seventy Five

Date: 10 DEC 2001

Prepared by: [Signature]

Checked by: [Signature]
VERIFIED

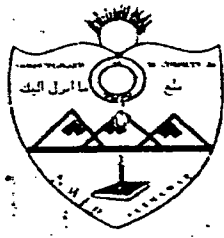
Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

M. Arif issued by
21-1-13
[Signature]
HEAD MASTER
G.M.S Suddarbar
Central Kurram Agency

ATTESTED
[Signature]

25

DIRECTORATE OF CURRICULUM & TEACHERS EDUCATION, NWFP, ABBOTTABAD



DETAIL MARKS CERTIFICATE
DIPLOMA IN EDUCATION

OK

NAME: - FAROOQ MUHAMMAD - SESSION: - 2006-07

FATHER'S NAME: - ARAB GUL - ROLL NO: - 168

Subjects: -	Maximum Marks	Marks Obtained		
		Internal	External	Total
1. Curriculum and Instructions	100	30	27	57
2. School Organization & Management	100	32	22	54
3. Testing, Evaluation & Basic Research	100	32	31	63
4. Teaching of Computer Science	100		46	46
5. Teaching of English	100		39	39
6. Teaching of Calligraphy/Art & Craft/Industrial Arts Agriculture/Home Economics/Phy: Education	100	36	44	80
7. Teaching Practice	150		45	45
Total 2 nd Term Marks: -	750			523
Total 1 st Term Marks:	750			449
G. Total Marks: -	1500			972

VERIFIED
ASSISTANT DIRECTOR
EXAMINATIONS
NWFP PESHAWAR

Note: Errors/Omission excepted.

Failed/Passed: - Passed Division: - Ist

Prepared By _____
Checked By _____
Date of Declaration of Result - 7th Feb

Theory Papers } Internal & External
Teaching Practice } Internal & External

Assistant Director
(Examinations)
NWFP Peshawar

Witnessed by

HEAD MASTER
G M S Sandaghar
Central Kurram Agency

ATTESTED

(Signature)



ABDUL WALI KHAN UNIVERSITY

MARDAN, PAKISTAN

26

TRANSCRIPT

NATIONAL COLLEGE OF PHYSICAL EDUCATION, MARDAN
M Ed

Name: FAROOQ MUHAMMAD

F: Name: ARAB GUL

Roll No: 6713

Reg. No: 11-AU-NCPM-M-84

1st Semester (Spring, 2011)							
Title of course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Educational Research	100	79	3	3.9	11.7		
Guidance & Counseling	100	70	3	3	9		
Teacher Education in Pakistan	100	68	3	2.8	8.4		
Advance Educational Psychology	100	70	3	3	9		
Curriculum Development	100	83	3	4	12		
Educational Measurement And Evaluation	100	89	3	4	12		
TOTAL	600	459	18		62.1	3.45	Promoted
2nd Semester (Fall, 2011)							
Title of course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Islamic System of Education	100	68	3	2.8	8.4		
Philosophy of Education	100	61	3	2.1	6.3		
Education in Pakistan Issues and Problems	100	61	3	2.1	6.3		
Educational Planing & Management	100	58	3	1.8	5.4		
Research Thesis	200	100	6	1	6		
TOTAL	600	348	18		32.4	1.80	Passed
			36		94.5		

CGPA 2.63

Errors & Omissions are subject to subsequent rectification
 Result Declaration Date: - May 01, 2012
 Prepared by: Ijaz Ahmad
 Checked by: Shahzad Khan

Arab Gul
Controller of Examinations

Witnessed by
Shahzad Khan
 DEAN
 Sins Sindhoghar

VERIFIED

Ijaz Ahmad
 Controller of Examinations
 Abdul Wali Khan University
 Mardan

ATTESTED

Arab Gul

(27)

Abdul Wali Khan University Mardan

S. No 9514



Provisional Certificate

Session Spring 2011

Roll No 6713

Registration No 11-AU-NCPEM-M-84

Certified that. Mr. / ~~Miss.~~ FAROOQ MUHAMMAD

Son / ~~Daughter~~ of ARAB GUL

Student / candidate of National College of Physical Education, Mardan has passed the MASTER OF EDU:

Examination held in Feb, 2012 by securing 807 Marks out of 1200

and has been placed in 2.63 ~~Division~~ / ~~Grade~~ / C.G.P.A

(The Examination was taken as a whole / ~~in parts~~)

[Signature]
Prepared by:

[Signature]
Checked by:

[Signature]
Controller of Examinations
Abdul Wali Khan University
Mardan

ATTESTED

[Signature]

28



ABDUL WALI KHAN UNIVERSITY

MARDAN PAKISTAN

25094

DETAILED MARKS CERTIFICATE

NATIONAL COLLEGE OF PHYSICAL EDUCATION, MARDAN
M Ed

Name: FAROOO MUHAMMAD

F: Name: ARAB GUL

Roll No: 6713

Reg. No: 11-AU-NCPEM-M-84


1st Semester (Spring, 2011)							
Title of course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Educational Research	100	79	3	3.9	11.7		
Guidance & Counseling	100	70	3	3	9		
Teacher Education in Pakistan	100	68	3	2.8	8.4		
Advance Educational Psychology	100	70	3	3	9		
Curriculum Development	100	83	3	4	12		
Educational Measurement And Evaluation	100	89	3	4	12		
TOTAL	600	459	18		62.1	3.45	Promoted

Errors & Omissions are subject to subsequent rectification

Result Declaration Date: - Sep 22, 2011

Prepared by: Ijaz Ahmad

Checked by: Shahzad Khan


Controller of Examinations

ATTESTED



K-29

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 3602-P /2014

Farooq Muhammad and others.....Petitioners

VERSUS

Additional Chief Secretary, FATA & others.....Respondents

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Date: 11.11.2014

Through

Petitioner

Adnan Khattak
Adnan Khattak

Advocate, Peshawar

Cell: 0300-5930703

ATTESTED

[Signature]

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2014

- ✓ 1. Farooq Muhammad S/o Arab Gul
- ✓ 2. Muhammad Saeed S/o Zarbat Khan
- 3. Ajab Khan S/o Gul Muhammad
- ✓ 4. Latif Hussain S/o Inam Hussain
- 5. Muhammad Ayaz S/o Gul Karim
- 6. Aziz ur Rehman S/o Said Rehman
- 7. Taj Ahmad S/o Lal Muhammad
- 8. Feroz Khan S/o Gul Zaman khan
- 9. Said Hassan S/o Muhammad Hassan
- 10. Hussain Ahmad S/o Muhammad Rafiq
- ✓ 11. Wahid Zaman S/o Zawta Khan
- 12. Mst. Muzlifa D/o Muhammad Farooq
- 13. Muhammad Yousaf S/o Abdul Aziz
- ✓ 14. Aqib Zaman S/o Syed Amir Shah (All CT Teachers,
Lower & Central Kurram Agency)
- 15. Khiyal Bat Khan S/o Hibat Khan
- 16. Kifayatullah S/o Mir Jehan
- ✓ 17. Zar Taj Bibi D/o Haji Ajmir Khan (All PET Teachers,
Lower & Central Kurram Agency)
- 18. Noor Zaman S/o Noor Jamal
- ✓ 19. Mst. Shamim Bibi D/o Spin Gul

ATTESTED



- ✓ 20. Parveen Bibi D/o Spin Gul (All DM Teachers, Lower & Central Kurram Agency)
- ✓ 21. Siraj ud Din S/o Walayat Khan
22. Zubair Khan S/o Ghafoor Khan (Both Junior Clerks/ JC, Lower & Central Kurram Agency)
23. Rehmatullah S/o Muhammad Rahim (Pesh Imam, Lower & Central Kurram Agency)
24. Rashid Khan S/o Khadi Khan (Lab Assistant)

.....PETITIONERS

VERSUS

1. Additional Chief Secretary, FATA
FATA Secretariat, Warsak Road, Peshawar
2. Secretary Finance,
Govt of KPK, Civil Secretariat, Peshawar
3. Additional Agency Education Officer,
Lower & Central Kurram, Sadda
4. Agency Account officer, Parachinar
5. Director of Education, FATA KPK, Peshawar

.....RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973**

Respectfully Sheweth:

1. That the respondent No.3 (Additional Agency Education Officer, Lower & Central, Kurram Sadda)

ATTESTED



floated advertisement in daily newspapers about the posts of PET, CT, Lab Assistant etc and petitioners, being eligible and qualified, applied for the same for selection on merit as such. (Copy of advertisement is attached as Annexure "A").

2. That the petitioners were interviewed and after going through the prescribed procedure of selection, they were, on the recommendation of Departmental Selection Committee appointed as such vide orders/ letters dated 15.01.2013, 18.01.2013 and 21.01.2013 respectively. (Copy of order/ appointment letters are attached as Annexures "B").

3. That petitioners were performing their duties with full devotion, after carrying-out their medical examination and taking charge on their respective posts, performing their duties till date. (Copies of medical certificates are attached as Annexure "C", charge reports are Annexure "D" and attendance sheets are Annexure "E").

4. That petitioners contacted respondents for payments of their monthly salaries but were told time and again that the department is going to prepare bills for the purpose. Every month took such practice but no fruitful result was ever achieved.

ATTESTED


- (33)
5. That petitioners were constrained to prefer their departmental appeals before the authorities but in vain. (Copies of appeals are attached as Annexure "F"). Hence, the petitioners being aggrieved, approached this Honourable Court, inter alia, on the following grounds

G R O U N D S:

- A. That from the date of appointments, petitioners are performing their duties on the respective posts till date.
- B. That respondents were contacted from time to time for payments of their monthly salaries but every time they were deceived with commitment to be paid the same in the next month.
- C. That when petitioners came to know that the department is not fulfilling its commitment for the purpose, they agitated the matter through representations, but without any response.
- D. That two junior clerks namely Sakhi Akbar S/o Siddique Akbar and Abidullah S/o Muhammad Ghulam were also appointed vide dated 18.01.2013 according to the same advertisement dated 25.10.2012, are receiving salaries from the respondent No.3 which is clear cut violation of Article 25 of the Constitution of Pakistan, 1973.

ATTESTED



E. That the act of the respondents by not paying the monthly salaries to the petitioners since the date of appointments, they are not only violating natural justice but also the cardinal principles of Islam.

F. That the petitioners are performing their respective duties honestly and the attendance sheets are duly attested by the Headmaster. (Copies are attached).

In view of the above, it is therefore, humbly prayed that on acceptance of this petition, this Honourable Court may graciously be pleased to:

- i. Direct the respondents to forthwith pay monthly salaries to the petitioners.
- ii. Any other relief available in the circumstances of the case, not specifically asked for, may also be granted to the petitioner.

Through

Petitioner

Adnan Khattak
Adnan Khattak
Advocate, Peshawar

Date: __.11.2014

CERTIFICATE:

Certified on instructions of my client that petitioners have not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.

Adnan Khattak
ADVOCATE

LIST OF BOOKS:

1. Constitution of Islamic Republic of Pakistan, 1973
2. Any other law books according to need

Adnan Khattak
ADVOCATE

ATTESTED




[Signature]

34

PESHAWAR HIGH COURT, PESHAWAR.

35

FORM 'A'
FORM OF ORDER SHEET

S.No.	Date of order	Order or other proceedings with signature of the Judge
1	2	3
	1.12.2015.	<p><u>W.P.No.3602/2014.</u></p> <p>Present: Mr.Adnan Khattak, Advocate for the petitioners.</p> <p>Syed Qaiser Ali Shah, AAG for Provincial Government.</p> <p>Comments have not been filed. The latter seeks time to do the needful. May do so. Adjourned to a date in office.</p> <p style="text-align: right;">  <u>JUDGE</u> </p> <p style="text-align: right;">  <u>JUDGE</u> </p> <p style="text-align: center;">ATTESTED</p> <p style="text-align: center;"></p> <p style="text-align: center;"><u>*M.Gul*</u></p>

Lower & Central Kurram Agency

NO 2987-93 /Edu

Dated 11/ 12 /2015

L-36

TERMINATION ORDER.

Consequent upon the direction by the competent authority, Director of Education FATA Peshawar vide his No 12228 dated 07.12.2015, on the decision of oversight committee the following in-eligible teaching/Non teaching appointees (M/F) BPS (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S #	Name	Father Name	Desg:	B P S	Name of Institution	Remarks
✓ 1	Aqib Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quotas.
2	Muhammad Asif	Syal Khan	CT	9	GHS Makhizai	Terminated due to excess in sub divisional quota & advance appointment against on fill post.
3	Sara Bibi	Sakhi Mar Jan	DM	9	GGMS Bagan	DM diploma found fake & bogus.
4	Shahid Melimood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of JDPE found fake & bogus.
5	Muhammad Usman	Haji Shah Wazir	PET	9	GMS Arawali	Having no professional qualification.
6	Muhammad Alam Khan	Salam Khan	I/C	7	GHS Makhizai	Failed in typing test & rejected by enquiry officers.
✓ 7	Zubair Khan	Ghafoor Khan	I/C	7	GDC Bagan	Rejected by PA enquiry.
8	Muhammad Sadiq	Gul Mar Jan	I/C	7	GGDC Alizai	Failed in typing test as per advertisement & rejected by enquiry officers.
9	Sakhi Akbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officers.
10	Sadia Batool	Abid Alam Jan	Lab/A-sstt	7	GGDC Alizai	Documents not provided for verification.
✓ 11	Muhammad Saeed	Zar Bat Khan	CT	9	GHS Baza	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota.
✓ 13	Latif Hussain	Inam Hussain	CT	9	GHS Angori	Domicile holder of upper kurram.
✓ 14	Wahid Zaman	Zawta Khan	CT	9	GHS Dogar	Terminated due to excess in sub divisional quota.
✓ 15	Farooq (Muhammad)	Arab Gul	CT	9	GMS Taudy Oby	Out of merit (M.Ed. has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar Khan	CT	9	GGMS Dogar No-2	Terminated due to excess in sub divisional quota.

TESTED

✓	Sakina	Niaz Bahadar	CT	9	GGMS Tabi Khonikhel	Terminated due to ex in sub divisional quot
	Samreen	Niaz Bahadar Khan	DM	9	GGMS Tarali	Documents not provide for verification.
✓	Maham Bibi	Spin Gul	DM	9	GGMS Dogar NO-2	Having no DM certificate & has not provide BA degree for verification.
✓	20. Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM certificate & has not provide BA degree for verification.
	21. Bibi Jamila	Niaz Bahadar Khan	DM	9	GGMS Tabi khonikhel	Having no DM certificate/diploma
	22. Sajid Rehman	Haji Haider Khan	PET	9	GMS Dappa	JDPE diploma found false & bogus.
	23. Zia ul Alam	Noor Alam	PET	9	GMS Khazeena	JDPE diploma found false & bogus.
	24. Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai	JDPE diploma found false & bogus.
✓	25. Kifayatullah	Mir Jehan	PET	9	GMS Kimal Baza	Having no professional documents.
✓	26. Zar Taj Bibi	Haji Amir Khan	PET	9	GGMS Ossai	Having no professional documents & Lower Kurram domicile holder while she was appointed in Central Kurram, also appeared in CT (LK) while appointed as PET (CK).
	27. Sajid Rehman	Said Aslam Khan	I/C	7	GHS Paloseen	Has been excluded by PA enquiry.
✓	28. Siraj U Din	Walayat Khan	I/C	7	GHS Manatoo	Failed in typing test as per advertisement & rejected by enquiry officers.

Add: Agency Education Officer Lower & Central Kurram Sadda.

No 2987-93 /Edu: Dated 11 / 12 /2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for similar action.

Add: Agency Education Officer Lower & Central Kurram Sadda.

ATTESTED

[Handwritten signature]

Before the Director of Education FATA
FATA Secretariat, Warsak Road,
Peshawar.

M-38

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER OF
ADDITIONAL EDUCATION OFFICE, KURRAM
AGENCY WHEREBY THE SERVICES OF THE
APPELLANT HAVE BEEN TERMINATED ON
11.12.2015.

Sir,

That the appellant states as under:

- 1) That according to the advertisement dated 25.10.2012 the appellant applied for the C.T post
- 2) That the appellant having the requisite qualification BA, Bed, DIE and Med
- 3) That the interview was held on 10.12.2012.
- 4) That the appellant was selected and appointed as a C.T teacher on GHS rudy oba ck dated 15.01.2013. by letter no-156-77
- 5) That the appellant performed their duties according to the entire satisfaction of their superiors.
- 6) That after a long time of three years an enquiry was conducted in the case of the appellant and the appellant was terminated on 11.12.2015 without any fault of the appellant.
- 7) That aggrieved with the order, the appellant has come before your honour on the following grounds:

GROUND:

- A. That all the acts and actions of the department is against law, facts, hence liable to be set aside.

ATTESTED

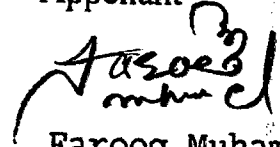


- B. That the department has ignored the fact that the appellant has the requisite qualifications.
- C. That the department has ignored the fact that the appellant has performed the duties for more than three years.
- D. That the department has not followed the law of the superior courts.
- E. That the selection was made according to law and rules by the department.

Therefore, it is requested that on acceptance of this appeal, the appellant may be reinstated in service with all back benefits.

Dated: 18.12.2015

Appellant



Farooq Muhammad
s/o Arab Gul , Central
Kurram Agency.

ATTESTED



VAKALATNAMA

IN THE COURT OF KPK Service Tribunal Peshawar
_____ OF 2016

Farooz Mohammad (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Department (RESPONDENT)
(DEFENDANT)

I/We Farooz Mohammad
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. ____/____/2016

Farooz Mohammad
CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK
(ADVOCATE)

OFFICE:
Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391
Mobile No.0345-9383141

"B"

Regd.
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 301 of 20 16.

Mu. Farooq Muhammad
Appellant/Petitioner

Versus

Chief Secretary, PATA PATA Sect.
Respondent

Respondent No. 3

Notice to: *All Agency Education Officer
Lower & Central Government Agency at Sialkot*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15-5-2016 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by an Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 5th Day of May 20 16.

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: 301/16
Mr. Farooq Muhammad Bz-CIT
GHS Tandy vs Kurram Agency Appellant.
VERSUS

1. Additional Chief Secretary FATA Secretariat Warsak Road Peshawar.
2. Director Education FATA Secretariat Peshawar.
3. Additional Agency Education Officer Lower & Central Kurram Agency
4. The Agency Account Officer Kurram Agency..... Respondents.

Para-wise comments on behalf of respondent No: 2 & 3

Respectfully Sheweth:

Preliminary Objections

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law.

On Facts:

1. Correct to the extent that advertisement was stated for different categories of post by Agency Education Officer, but the candidates applied were not eligible, as on various complaints inquiry was conducted and anomalies were found in the recruitment process.
2. Correct to the extent that appointment orders were issued to the petitioners and other candidates, but the respondents Department legally intervened and constituted search committee to trace out bogus degree holders, therefore, the committee submitted its report clearly picked out those candidates who had applied through fake/bogus degrees, report of search committee attached as (Annexure-A).
3. No comments. Subject to record.
4. The respondent department in order to investigate/inquire the anomalies carried out in recruitment process in Kurram Agency held inquiries and constituted search Committee. It is pertinent to mention here that the responsible Officer was charge Sheeted and proposed to the Government for necessary action under E&D rules. However the salaries of those candidates whose degree's/certificates were verified by the over-sight committee were ordered to be initiate against all those involved in fakism and forgery, copy of letter annexed as (Annexure-B) also a letter No. 12229-36 dated 07/12/2015 was addressed to Additional Agency Education Officer, Lower and Central Kurram Agency for the release of salaries of eligible candidates and terminate in-eligible candidates, copy of letter attached as (Annexure-C).
5. No comments. As explained in Para No.4 above.
6. No comments. As explained in Para No.4 above.
7. No comments. Pertains to record.

Grounds:

- A. Incorrect. Respondent has not taken any action which is against Law & facts.
- B. Incorrect. Respondents have acted according to law/policy as the appellant was wrongly appointed, therefore their appointment was liable to struck down under the law.
- C. As explained in Para-B above.
- D. No comments. As stated above in Para-B.
- E. Incorrect. As explained in Para-D above.


- F. No comments. Hence denied.
- G. No comments. Pertains to record.
- H. No comments. Pertains to record.
- I. No comments. As stated above.
- J. Respondents also seeks permission to advance other grounds at the time of arguments.

In light of the above facts it is humbly requested to please dismiss the appeal having no legal grounds with cost.

Respondent NO. 2


Director Education FATA

Respondent NO. 3


Addl: Agency Education Officer
Kurram at Parachinar


AFFIDAVIT

We the above respondents do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.

Respondent NO. 2


Director Education FATA

Respondent NO. 3


Addl: Agency Education Officer
Kurram at Parachinar

(A) 32
Better Copy

Additional agency Education officer
Lower & Central Kurram agency
No. 2787-23/Edu
Dated 11/12/2015

TERMINATION ORDER.

Consequent upon the direction by competent authority, Director of Education FATA Peshawar vide his no. 12228 dated 07-12-2015 on the decision of overnight committer the following in-eligible teaching/non-teaching appointees (m/F) BPA (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S#	Name	F/Name	Desg:	B P S	Name of institution	Remarks
1	Aqlb Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota
2	Muhammad Asif	Syal khar.	CT	9	GHS Makhuzu	in sub divisional quota & advanced appointment against on fill post
3	Sara bibi	Sakhi mar jan	DM	9	GGMS Bagan	DM diploma found fake & bogus
4	Shahid Mehmood	Haji Sher Shah	PET		GMS Sraghurga	Diploma of JDr found fake & bogus.
5	Muhammad usman	Haji Shah wazir	Pet	9	GMS Arawali	Having no professional qualification
6	Muhammad Alam Khan	Salam khan	I/C	7	GHS Markuzai	Failed in typing test & rejected by enquiry officer.
7	Zubair Khan	Ghafoor Khan	I/C	7	GDC Bagan	Rejected by PA enquiry
8	Muhammad Sadiq	Gul Mar jan	I/C	7	GGDC Ahzair	Failed in typing test as per advertisement & rejected by enquiry officer
9	Sakhi Akhbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officer
10	Sadia Batool	Abid Alam Jan	Lab/A	7	GGDC	Documents not provided
11	Muhammad Saced	Zar bat khan	Ct	9	GHS	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota
13	Latif Hussain	Imam Hussain	CT	9	GHS Augori	Domicile holder of upper Kurram
14	Wahid Zaman	Zawta khan	CT	9	GH Dogar	Terminated due to excess in sub divisional quota
15	Farroq Muhammad	Arab Gul	CT	9	GMS Taudy oby	Out of merit (m.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar khan	CT	9	GGMS Dogas No-2	Terminated due to excess in sub divisional quota

1. Sajid Sakhin	Terminated due to evidence of subversive activities. Documents not presented for verification.
2.	Having no DM certificate & has not provide BA degree for verification.
3.	Having no DM certificate & has not provide BA degree for verification.
4.	Having no DM certificate/diploma
5.	DDP diploma found fake & bogus.
6.	DDP diploma found fake & bogus.
7.	DDP diploma found fake & bogus.
8.	Having no professional documents.
9.	Having no professional documents & lawyer. But a domestic holder while she was appointed in Central Kurram, also appointed (V.P. 11) while appointed as P.T. (11) 1982 (then included by PTA enquiry).
10. Sajid Rehman	Said Anwar Khan	16	17	18	19	20	Failed in typing test as per advertisement & reported by enquiry officers.
11. Saif U Din	Muhammad Khan	17	18	19	20	21	

77

Adl Agency Education Officer
Lower & Central Kurram, Badkha

No. 2987-01 / Education / 11/12/2011
Copy for information to:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for similar action.

Adl Agency Education Officer
Lower & Central Kurram, Badkha

	Bibi Sakina	Haji Gul Akbar	CT	9	GGMS tabi Khonikhel	Terminated due to excess in sub divisional quota
18	Samreen Sadaf	Haji Anis Khan	DM	9	GGMS Tarali	Documents not provided for verification
19	Shamin Bibi	Spin Gul	DM	9	GGMS Dogar No2	Having no DM Certificate & has not provide BA degree for verification
20	Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM Certification & has not provide BA Degree for verification
21	Bibi Jamila	Khan	DM	9	GGMS tabi khonikhel	Having no DM certificate / Diploma
22	Sajid Rahman	Haji Haider Khan	PET	9	GMS DAPA	JDPE diploma found fake & bogus
23	Zia ul Alam	Noor Alam	Pet	9	GMS Khazcena	JDPE diploma found fake & bogus
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai	JDPE diploma found fake & bogus
25	Mr. Jehan	PET	9	GMS Kunal Baza	Having no professional documents
26	Zar Taj Bibi	Haji Anmir Khan	Pet	9	GGMS Ossai	Having no professional documents & lower Kurram domicile holder while she was appointed in Central Kurram also appointed ...
27	Sajid Rehman	Said Adam Khan	I/C	7	GHS	Hs been expelled by pa enquiry
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatoo	Failed in typing test as per advertisement & rejected by enquiry officers.

Add. Agency Education Officer
Lower & Central Kurram Sadda.

No 2987-93 /Edu dated 11-12-2015

Copy for information to the: -

1. Director of education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency
4. Agency Account Officer Kurram Agency.
5. Assistant political agent Lower Kurram
6. Assistant Political Agent Central Kurram.
7. Principals/ Headmasters concerned for similar action

Add: Agency Education Officer
Lower & Central Kurram Sadda



2

(18) ineligible
Concluded

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE 091 9210166 FAX 091-9210216

NO. _____
DATED 7/12/2015 E-7-6 MEETING FILE RC

Most Urgent.

To

The Additional Agency Education Officer
Lower & Central Kurram Agency

Subject: RELEASING OF PAY /SALARIES OF FRESH APPOINTEES,
APPOINTED DURING 2012-13.

Memo:

Please refer to this Directorate Memo.No.1446 dated 13/12/2014, addressed to Agency Accounts Officer Kurram Agency.

Consequent upon the recommendations of oversight committee, constituted by the competent authority, I am directed to inform you to release the salaries of eligible candidates appointed during 2012-13 by your office as per enclosed lists attached duly signed by the oversight committee members and terminate in-eligible candidates as per lists attached with effect from the date of their appointments and if salaries paid to them be recovered from them accordingly.

^{Set}
Deputy Directress (Estab)

Endst.No. 12228-36
Copy to;

Dated 7/12 2015

1. Political Agent Kurram Agency with the request to take action against the candidates as per enclosed lists appointed on fake documents as per rules.
2. Agency Education Officer Kurram Agency.
3. Deputy Director (F/A) local Directorate.
4. Deputy Secretary Law & Order FATA Secretariat.
- ✓ 5. Assistant Director (Litigation) local Directorate.
6. PS to secretary AI&C FATA Secretariat.
7. PS to Secretary SSD FATA.
8. P.A to Director Education, FATA.

(2)

Deputy; Directress (Estab)



no. 10118

DATED 30/9/2015 E-7-6 MEETING FILE KC

To

The Political Agent
Kurram Agency

10118

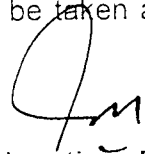
Subject: APPOINTMENT MADE BY MR. MOEEN GUL AAEO; AEO
LK/CK.

Memo:

I am directed to refer to your letter No.5733 dated 30-4-2015 on the subject noted above and to state that on the recommendation of oversight Committee, the competent authority is pleased to dispose of instant case as under.

1. Being Appellate authority, the Political Agent concerned may dispose with the services of the ineligible candidate's initiate criminal cases against these appointees on fake documents and recover the salaries from them (list attached).
2. The eligible candidates may be retained and their salaries be released (list attached).


You are therefore requested that action may be taken at your end under intimation to all concerned.


o/c Director Education, FATA

Endst.No. 10119-25
Copy to;

Dated 30/9 2015

1. Agency Education Officer Kurram Agency at Parachinar.
2. Deputy Secretary Law & Order FATA Secretariat.
3. Deputy Director (F&A) local Directorate.
4. PS to Secretary F&A FATA Secretariat.
5. Additional Agency Education Officer Lower/Central Kurram.
6. PS to Secretary SSD FATA.
7. PA to Director Education, FATA.


o/c Deputy Directress (Estab)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 301 /2016

FAROOQ MUHAMMAD VS

EDUCATION DEPTT:

REJOINER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Admitted correct the extent of advertisement which was published in the Daily Newspaper advertised various posts while the remaining para is incorrect. That appellant having Domicile of Kurram Agency and the requisite qualification applied for the said post and after participation in the test and interview the appellant was declared successful in the said selection process. That after completion of selection process the appellant was appointed vide appointment order dated 18.01.2013. That in response of the said appointment order the appellant submitted his charge report and started performing his duty at the concerned station quite efficiently and up to the entire satisfaction of his superiors. That no complaint whatsoever has been received during the entire service of the appellant and appellant had regularly performed his duty.
- 2- Admitted correct to the extent of appointment order of the appellant while the remaining Para is incorrect. That after appointment salaries of the appellant withheld by the respondent Department without assigning any reason while the appellant was regularly performing his duty. That at the time of appointment the appellant submitted original educational documents but the respondent No.3 malafidely terminated the appellant.
- 3- Needs no comments.
- 4- Incorrect and misconceived. That the respondent Department inquire/verified the educational documents of the appellant from the concerned Board/University which

were found clear. That inspite of that the respondent Department withheld the salaries of the appellant. That appellant time and again approach the concerned quarter for release of his salaries but no response has been given by the concerned authority. That feeling aggrieved finally the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. 3602-P/2014 for release of his salaries but during the pendency of the said writ petition the Additional Agency Education Officer, Lower and Central Kurram Agency terminated the services of the appellant without conducting regular inquiry in the matter.

- 5- Incorrect and not replied accordingly hence denied.
- 6- Incorrect and not replied accordingly hence denied.
- 7- Need no comments.

GROUND:
(A to D):

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect, baseless and not in accordance with law and Rules hence denied. That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015. That the respondent department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 and the respondent Department had not adopted the codal formalities before issuing the impugned termination order. Moreover as per Supreme Court Judgments regular inquiry is necessary before taking punitive action against the civil servants.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT

FM.
FAROOQ MUHAMMAD

THROUGH:

N. Q.
NOOR MOHAMMAD KHATTAK
ADVOCATE

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. ^{DB} 301, 303, 304, 488 & 487 of 2011

Farooq Mohammad & (4) other Connected
Appellant/Petitioner

AD J
10/10/22

Versus

Additional Chief Secy - FATA Secretariate Pesh.
RESPONDENT(S)

Respondent (1)

Notice to Appellant/Petitioner

Additional Chief Secy FATA,
FATA Secretariat, Warsak Road, Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/10/2022 at 9:00am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Arguments
[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar
10/10/22

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. 301, 303, 304, 480 & 487 ^{DB} of 2016.

Farooq Muhammad & (4) other connected
Appellant/Petitioner

AD II

Versus

10/10/22 Additional Chief Secy FATA Secretariat Pesh.
RESPONDENT(S)

Respondent (2)
Notice to Appellant/Petitioner Director of Education FATA, FATA
Secretariat, Wazirabad Road Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/10/2022 at 9.00am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Arguments

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Received
Notice
10-22-22
Assistant Director (Litigation)
ESSE Department
Khyber Pakhtunkhwa Peshawar