Appellant in person present.

Muhammad Jan, learned District Attorney for respondents present.

Written reply on behalf of respondents No.1 to 5 has already been submitted. Respondent No.6 attended the Bench on 19.04.2022 with a request for adjournment, where-after, he did not appear, hence, placed ex-parte. Respondents No.7 & 8 were served but not presente, hence, placed ex-parte. Attendance is complete and reply of respondents No.1 to 5 has been submitted. Therefore, file to come up for arguments on 17.11.2022 before D.B at Camp Court, Abbottabad.

(Rozina Rehman) Member (J) Camp Court, A/Abad 15.06.2022

Appellant in person present. Mr. Adeel Butt, Additional Advocate General alongwith DEO (M) Mansehra, Muhammad Toseef ADEO and Muhammad Hassan present.

Despite direction notices were not issued to respondents No. 7 & 8. Therefore, fresh notice be issued to respondent No. 7 & 8 for submission of reply/comments failing which their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for written reply/comments on 22.07.2022 before S.B at Camp Court Abbottabad.

(Fareeha Paul) Member (E) Camp Court A/Abad

22nd July 2022 Appellant alongwith his counsel present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Hamid Mansoor, Assistant for respondents present.

Written reply on behalf of the respondents No. 1 to 5 submitted. Copy handed over to the appellant. None for private respondents No. 7 and 8 not in attendance. On previous date notices were directed to be issued to private respondents No. 7 and 8 but those were not issued. Office is directed to issue fresh notices to private respondents No. 7 and 8 for submission of written reply/comments. To come up for written reply of private respondents No. 7 and 8 on 23.09.2022 before S.B at camp court Abbottabad.

(Kalim Arshad Khan) Chairman Camp Court Abbottabad 04.04.2022

Appellant present in person. None present on behalf of the respondents.

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Notices issued to the respondents have not been received back. Fresh notices be issued to the respondents for the date fixed. The appeal pertains to territorial limits of Hazara Division, therefore, it would be proper to enter it in the diary of Camp Court, Abbottabad. To come up for reply/comments on 19.04.2022 before S.B at camp court, Abbottabad.

Chairman

19.04.2022

Appellant in person present. Mr. Muhammad Touseef, ADO (Litigation) alongwith Mr. Kabirullah Khattak, Additional Advocate General for official respondents No. 1 to 6 present and requested for further time to submit written reply/comments. Respondents are directed to submit their written reply/comments on the next date positively, failing which their right for submission of reply/comments shall be deemed as struck off.

None present on behalf of private respondents No. 7 & 8, therefore, notice be issued to private respondents No. 7 & 8 for submission of written reply/comments on the next date positively, failing which their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for written reply/comments on 15.06.2022 before the S.B at Camp Court Abbottabad.

(Salah-Ud-Din)

Member (J)

Camp Court Abbottabad

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant at the outset of his arguments stated that this is second round of litigation. In the first round of litigation, the Service Tribunal had earlier set aside the notification of compulsory retirement of the appellant dated 06.11.2017 and directed the respondent-department to conduct de-novo enquiry vide its judgement dated 15.03.2021. The department conducted the de-novo enquiry through an enquiry committee but the competent authority did not agree with its recommendations (lenient and favorable to the appellant) and awarded him the same penalty of compulsory retirement. with recovery of Rs. 8,50,000/- vide impugned order dated 04.09.2021. Feeling aggrieved, the appellant submitted departmental appeal on 09.09.2021 but no appellate order was passed and resultantly the instant service appeal was instituted in the Service Tribunal on 18.10.2021. It was further contended that neither any amount of the PTC was embezzled nor such like allegation was proved against the appellant. The impugned order dated 04.09.2021, show cause notice as well as inquiry report being wrong, illegal, against the law and facts, arbitrary, fanciful, without lawful authority, based on malafide, is liable to be set aside.

Appeliant Deposited
Security Process Fee

The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 04.04.2022 before S.B.

(Mian Muhammad) Member(E)

Form-A

FORM OF ORDER SHEET

Court of	sed pagents.	and the second	
. B1 -		7057.	

	Case No	7857/2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/12/2021	The appeal of Mian Muhammad Hassan resubmitted today by M
i	•	Junaid Anwar Khan Advocate may be entered in the Institution Register an
	•	put up to the Worthy Chairman for proper order please.
		· · ·
	•	REGISTRAR
	•	
2-		This case is entrusted to touring S. Bench at A.Abad for preliminar
	·	hearing to be put there on 301212.
		$\mathcal{A}_{\mathcal{A}}$
·	•	CHAIRMAN
İ		
	-	
3	0.12.2021	Clerk of counsel for the appellant seeks adjournment due to
-	r	on-availability of learned senior counsel. Request is accorded. To
	. c	ome up for preliminary hearing on 18.02.2022 before S.B at
	c	amp court, Abbottabad.
.	· .	Chairman
	_	Camp Court, A/Abad
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	· / ·	
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This is an appeal filed by Mr. Mian Muhammad Hassan today on 18/10/2021 against the order dated 04.09.2021 against which he preferred/made departmental appeal/ representation on 09.09.2021 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Certificate/Verification be given to the effect that the appellant has not been filed any service appeal earlier on the subject matter before this Tribunal is not signed by the appellant.
- 3- Check list is not attached with the appeal.
- 4- Annexures attached are not attested, which may got be attested.
- 5- Annexures A, B, E, H, Z and show cause notice on page 129 attached with the appeal are illegible which may be replaced by legible/better one.

No. 2073/ST, Dt. 18/10/2021

REGISTRAR SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Junaid Anwar Khan Adv. High Court Manschra.

Objection has been removed and 90 (ninety) das has also been lapsaed, Hince please put up before the court.

Hassam

BEFORE KHYBER PKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CHECK LIST

Case Title: Mign Muhamorad Hallan vs Govt. of KPK

S.#	Contents	Yes	No
1.	This appeal has been presented by: Tunaid Anway Advocate		
	Whether Counsel / Appellant / Respondent / Deponent have signed the	/	
2.	requisite documents?	V	
3	Whether Appeal is within time?		
4.	Whether the enactment under which the appeal is filed mentioned?		
5.	Whether the enactment under which the appeal is filed is correct?	V	
6.	Whether affidavit is appended?	~	
7.	Whether affidavit is duly attested by competent oath commissioner?		
8.	Whether appeal/annexures are properly paged?	V	
9.	Whether certificate regarding filing any earlier appeal on the	V	
10	subject, furnished?		
10.	Whether annexures are legible?		
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?		
13.	Whether copy of appeal is delivered to A.G/D.A.G?	V	 -
14.	Whether Power of Attorney of the Counsel engaged is attested and	V	
	signed by petitioner/appellant/respondents?		
15.	Whether numbers of referred cases given are correct?		\
16.	Whether appeal contains cuttings/overwriting?	<u> </u>	<u> </u>
17.	Whether list of books has been provided at the end of the appeal?		<u> </u>
18.	Whether case relate to this Court?		
<u> 19.</u>	Whether requisite number of spare copies attached?	Y	-
20.	Whether complete spare copy is filed in separate file cover?	V	
21.	Whether addresses of parties given are complete?		
22.	Whether index filed?	//	
23.	Whether index is correct?	V	
24.	Whether Security and Process Fee deposited? on		
	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974		·
25.	Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on	:	

is certified that formalities/documentation as required in the above table ha	ave been fulliled.
Name:	ad Armes Advante

Signature:

Dated:

09/12/2011



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Mian Muhammad Hassan

VERSES

Govt of KPK..Respondents.

Balako Mian Muhammad Hassan S/O Mian Mehmood resident of Shahoter Tehsil Balakot District Mansehra do hereby solemnly affirms and declares that I have not been filed any service appeal earlier on the subject matter before this Tribunal

Dated of /11 / 2021

Through

Advocate High Court,

Mansehra.

<u>PAKHTUNKHWA, PESHAWAR</u>

Service No. <u>7857</u> /2021

Main Muhammad Hassan son of Mian Mehmood resident of Shahoter, Tehsil Balakot District Mansehra, Ex-PSHT, Govt. Primary School Pludran, Circle Kaghan, Tehsil Balakot District Mansehra.

..APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, thrugh Secreatry Elementry & Secondary Educaton, Peshawar & Others.

... RESPONDENTS

SERVICE APPEAL CHECK LIST

S.#	Description	Annexure	Page#
. 1	Service appeal along with affidavit		1 to 28
. 2	Copy of the appointment letter	"A"	29-30
3	Copy of the promotion order	"B"	31-33
4	Copy of the transfer order	"C"	34
5	Copies of the log book of ADO Circle Kaghan	"D"	35-45
6	Copy of the resolution	"E"	46
7	Copies of expenditure	"F"	47-99
. 8	Copies of pictures and other relevant record	"G"	100-127
9	Copy of show cause notice	"H"	128-129
10	Copy of reply	"I"	130-131
11	Copy of the impugned notification dated	"Ј"	132
	06/11/2017		
12.	Copy of the departmental appeal	"K"	133-136
13	Copy of the notification / order dated 02/05/2018	"L"	137
14	Copy of service appeal	"M"	138-154
15	Attested copy of order dated 15/03/2021 of this	"N"	155-159
	Honourabel Tribunal		
16	Copies of the applications	"O"	160-161
17	Copies of Affidavits	"P"	162-163
18	Copy of the show cause notice	"O"	164
_19	Copy of Endst. Dated 24/06/2021	"R"	165
20	Copy of reply	* "S"	166-168
21	Copy of impugned inquiry report	"I"	169-172

_	Parent Teacher Council	,	
25	Copy of Module-1	· "X"	180-181
26	Copy of Booklet Module-2	"Y"	182-183
. 27-	Copy of the extract of compensation	"Z"	184-189
28	Wakalatnama	. 1	190

/2021

..APPELLANT

Through

(JUNAID ANWAR KHAN)

Advocate High Court, Mansehra

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 7857 /2021

Mian Muhammad Hassan son of Mian Mehmood, resident of Shahotar, Tehsil Balakot, District Mansehra, Ex-PSHT, Govt. Primary School Pludran, Circle Kaghan, Tehsil Balakot, District Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar & others.

... RESPONDENTS

SERVICE APPEAL

INDEX

S. #	Description	Annexure	Page #
1.	Service appeal along with affidavit		1 to 28
2.1	Copy of the appointment letter	"A"	29.30
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7.	Copies of expenditure	"F"	47-99
8.	Copies of pictures and other relevant record	"G"	100_ /2
9.	Copy of show cause notice	"H"	128-129
10.	Copy of reply	"I"	130-13
11.	Copy of the impugned notification dated 06.11.2017	"J"	132
12.	Copy of the departmental appeal	"K"	133-136
13.	Copy of the notification/ order dated 02.05.2018	"L"	137

"M"	138-154
"N"	155_ 159
"O"	160-161
"P"	162-163
"Q"	164
"R"	165
"S"	166-168
"T"	169-172
"U"	173
"Ý"	174-178
"W"	179
"X"	180-181
"Y"	182-183
"Z"	184-18
	190
	"P" "Q" "R" "S" "T" "U" "W" "X"

Through

Dated: **25/9** /2021

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(JUNAID ANWAR KHAN)
Advocate High Court, Mansehra

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. /202

Main Muhammad Hassan son of Mian Mehmood resident of Shahoter, Tehsil Balakot District Mansehra, Ex-PSHT, Govt. Primary School Pludran, Circle Kaghan, Tehsil Balakot District Mansehra.

..APPELLANT

VERSUS

- 1. Govt. of Khyber Pakhtunkhwa, thrugh Secreatry Elementry & Secondary Educaton, Peshawar.
- 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. Deputy Director (Establishment), Elementary & Secondary Education, Khyer Pakhtukhwa, Peshawar.
- 4. District Education Officer (Male), Mansehra.
- 5. Sub-Divisional Education Officer, Balakot.
- 6. ASDEO Circle Balakot.
- 7. Muhammad Aslam, Principal, Govt. High School Shohal Mazullah, Tehsil Balakot, District Mansehra
- 8. Muhammad Sajid, Head Master, Govt. High School Paras, Tehsil Balakot, District Mansehra.

..RESPONDENTS

SERVICE APPEAL UNDER SECTION OF KP SERVICE TRIBUNAL ACT, 1974

AGAINST THE IMPUGNED SHOW CAUSE NOTICE BEARING NO.6323/LIT 24.06.2021 PASSED/ **ISSUED** BY RESPONDENT NO.4 AND ON THE BASIS OF ŠÅME SO-CALLED **INQUIRY** REPORT DATED 10.06.2021 PREPARED/ ISSUED BY THE RESPONDENTS NO.7 & 8 AND THE IMPUGNED OFFICE ORDER **BEARING** NO.10377/LITIGATION/S.A # 696/2018 DATED 04.09.2021 PASSED/ ISSUED BY RESPONDENT NO.4, WHEREBY. APPELLANT WAS COMPULSORY RETIRED FROM THE GOVT. SERVICE, FURTHER AMOUNT OF CONDITIONAL: **GRAND** OUTSTANDING AGAINST THE APPELLANT AMOUNTING TO RS.8,50,000/- WAS ALSO ORDERED TO BE RECOVERED FROM THE APPELLANT AND BE DEPOSITED INTO THE GÖVT. TREASURY IMMEDIATELY.

H965 an

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED SHOW CAUSE NOTICE BEARING NO.6323/LIT DATED 24.06.2021

PASSED/ ISSUED BY RESPONDENT NO.4 AND ON THE BASIS OF SO-CALLED INQUIRY REPORT DATED 10.06.2021 PREPARED/ ISSUED BY THE RESPONDENTS NO.7 & 8 ALONGWITH THE IMPUGNED ÖFFICE ORDER **BEARING** NO.10377/LITIGATION/S.A # 696/2018 DATED 04.09.2021 PASSED/ ISSUED THE RESPONDENT NO.4, WHEREBY. APPELLANT WAS COMPULSORY RETIRED FROM THE GOVT. SERVICE, FURTHER AMOUNT OF CONDITIONAL **GRAND** OUTSTANDING AGAINST THE APPELLANT AMOUNTING TO RS.8,50,000/- WAS ALSO ORDERED TO BE RECOVERED FROM THE APPELLANT AND BE DEPOSITED INTO THE GOVT. TREASURY IMMEDIATELY PEEASE BESET ASIDE AND THE APPELLANT MAY GRACIOUSLY BE REINSTATED INTO SERVICE WITH ALL BACK BENEFITS AND THE ORDER FOR RECOVERY OF RS.8,50,000/- MAY ALSO KINDLY BE SET-ASIDE.

Respectfully Sheweth:-

That the appellant was inducted in the Education Department as PST on 16.09.1989 and since then, the appellant is working with great zeal and zest to the entire satisfaction of his superiors.

(Copy of the appointment letter is annexed as Annexure "A").

That, later on, the appellant was promoted to the post of PSHT on 19.11.2015 keeping in view the best service of the appellant.

(Copy of the promotion order is annexed as Annexure "B").

That, after the promotion, the appellant was transferred to Govt. Primary School Pludran as PSHT on 21.12.2015.

(Copy of the transfer order is annexed as Annexure "C").

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That, at the time of transfer of appellant, an amount of Rs.8,50,000/- was lying in Parent

Teacher Association (PTA) Account for the

construction of boundary wall, wash rooms alongwith sanitation.

That, GPS Pludran is situated at the bank side of River Kunhar and the school building was badly affected due to the flood of 9th September, 1992 and 24 Marlas property of the school was destroyed due to heavy flood and the boundary walls were also damaged.

That during earthquake of 8th October, 2005, the school building of the Govt. Primary School Pludran was also badly damaged rather collapsed and the students and teachers were carrying out their educational activities under the open sky in a very bad weathers of Kaghan area. This fact was also mentioned in the log book of ADO Circle Kaghan in so many times. The appellant after his transfer to the school, immediately called the meeting of Parent Teacher Council to discuss the matters mentioned above.

(Copies of the log book of ADO Circle Kaghan are annexed as Annexure "D").

That, Chairman and the members of Parent
Teacher Council (PTC) alongwith the elders
of the locality passed a unanimous
resolution to the fact that the amount which
is lying pending in PTA account for
boundary wall was to be used for the other
immediate and necessary construction works
and to this effect, the appellant was asked to
sought permission for the construction work
of school.

(Copy of the resolution is annexed as Annexure "E").

That, on the basis of unanimous resolution and unanimous decision of Parent Teacher Council and on the recommendation and permission of the highups of Education Department i.e respondent No.3, an amount of Rs.3,04,050/- were spent on the construction and renovation of the building. Similarly, an amount of Rs.2,84,289/- was spent on the Water Supply Scheme for school children.

(Copies of expenditure are annexed as Annexure "F").

That, it is also worth mentioning here that an amount of Rs.1,60,000/- was expended on the construction of group latrine for the students of Govt. Primary School Pludran with the permission of highups and an amount of Rs.73,661/- was also spent on the construction of washroom for the teachers and to this effect, a permission was also sought from the DEO (Male), Mansehra. Furthermore, an amount of Rs.1,00,000/was also spent on the white wash of the walls of school as well as for making boards etc. in the school, whereas, an amount of Rs.10,000/- was also paid to the masons etc. Besides this, an amount of Rs.5880/- was spent for purchase of water tank and Rs.6100/- was spent on 06 chairs one table and Rs.4000/- was spent on CCA fund for the purchase of stationary etc. So, total amount of Rs.8,58,980/- was spent and Rs.8980/- were spent by the appellant from his own pocket for the construction and other works of the Govt. Primary School Pludran.

10.

İ1.

That, all the development works were carried out on the spot with the permission of DEO Mansehra during and the construction, DEO, Deputy DEO and ADEO Circle Kaghan visited the spot many times and they also taken pictures of the construction work on the spot. The file of construction work alongwith the pictures was also handed over to the respondents and they appreciated the work of the appellant on the spot.

(Copies of pictures and other relevant record are annexed as Annexure "G").

That, later on, the respondent No.4 initiated a so-called inquiry against the appellant with the connivance of his opponents and the ASDEO Mansehra was appointed as Inquiry Officer who conducted inquiry and submitted his false and fictitious inquiry report to respondent No.3 through letter No.395 dated 15.08.2017.

Harson

12. That, later on, on the basis of so-called inquiry, the respondent No.4 issued a show cause notice to the appellant with the connivance of the opponents of the appellant.

(Copy of show cause notice is annexed as Annexure "H").

- 13. That, the appellant duly replied the show cause notice issued by the respondent No.4.

 (Copy of reply is annexed as Annexure "I").
- 14. That, later on, respondent No.4 issued the impugned notification/ order bearing No.19303-10 dated 06.11.2017, whereby, the appellant was compulsory retired from service and ordered for the recovery of Rs.8,50,000/- from the appellant and depositing the same in relevant PTC account immediately.

(Copy of the impugned notification dated 06.11.2017 is annexed as Annexure "J").

16.

5. That the appellant preferred a departmental appeal before respondent No.2 on 14.11.2017 upon which comments were sought from respondent No.4 who submitted his comments vide his letter No.20732 dated 06.12.2017.

(Copy of the departmental appeal is annexed as Annexure "K").

That, the appellate authority constituted another inquiry committee to dig out the facts vide notification Endst. No.4126-28 dated 18.02.2018 and appointed the officials of the respondents' department as inquiry officers. The inquiry committee submitted his report which was sent to DEO (Male), Mansehra for his comments. The DEO (Male), Mansehra submitted his comments vide letter No.6553 dated 12.04.2018 with the remarks that inquiry recommendations are against the ground realities and material facts on the ground and therefore it can be regretted.

Harsan

18.

17. That, later on, the respondents No.2 and 3 issued the order/ notification bearing No.7019-20 dated 02.05.2018, whereby, the departmental appeal of the appellant was turned down.

(Copy of the notification/ order dated 02.05.2018 is annexed as Annexure "L").

That the appellant being aggrieved from the order/ notification dated 02.05.2018 filed a service appeal No.696/2018 on 21.05.2018 which was decided by this Honourable Tribunal on 15.03.2021 and impugned order dated 06.11.2017 was set aside and the appellant was reinstated in his service. Further the respondents were directed to conduct denovo inquiry strictly in accordance with law and rules, within a period of 90 days.

(Copy of service appeal alongwith attested copy of order dated 15.03.2021 of this Honourable Tribunal is annexed as Annexure "M" & "N").

That after obtaining the attested copy of 19. judgment/ order of this Honourable Tribunal, the appellant approached the respondents for the implementation of the order of this Honourable Tribunal but neither the appellant was reinstated in the service nor the pay of the appellant or back benefits were given to the appellant. To this effect appellant has submitted. also application alongwith affidavits to the respondents and also submitted several other applications to the respondents but in vain. (Copies of the applications alongwith affidavits are annexed as Annexure "O" & (P'').

20: That in the meanwhile, the respondents issued impugned show cause notice without dated to the petitioner and sent the same through respondents No.5 & 6 through Endst. No.6323/Lit dated 24.06.2021. (Copy of the show cause notice alongwith Endst. dated 24.06.2021 is annexed as Annexure "Q" & "R").

21. That the appellant submitted a complete and comprehensive reply of the show cause notice to the respondents.

(Copy of reply is annexed as Annexure "S").

22. That the inquiry committee/ respondents
No.7 & 8 have not taken into consideration
the statements and the reply of the appellant
and illegally given their recommendations
through impugned inquiry report No.903
dated 10.06.2021.

(Copy of impugned inquiry report is annexed as Annexure "T").

That later on, the respondent No.4 issued impugned office order bearing No.10377/Litigation/S.A # 696/2018 dated 04.09.2021, whereby, the appellant was compulsory retired from service and ordered for recovery of amount of Rs.8,50,000/-from the appellant and depositing the same in the Govt. treasury with immediate effect. (Copy of the impugned office order dated 04.09.2021 is annexed as Annexure "U").

Harson

23.

24. That the appellant preferred a departmental appeal before the respondent No.2 on 09.09.2021 which has not been answered/decided by the respondent No.2 till the expiry of mandatory period.

(Copy of the departmental appeal is annexed as Annexure "V")

25. That the appellant being aggrieved from the impugned orders and by not deciding the appeal of the appellant within time, seeks the gracious indulgence of this Honourable Tribunal, inter-alia, on the following grounds:-

GROUNDS;-

a) That the impugned order dated 04.09.2021 alongwith show cause notice as well as inquiry report issued by the respondents are wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, without lawful

Jassan

authority, based on malafide, hence, liable to be set aside/ struck down..

any amount of Parent Teacher Council nor any such like allegation was proved against the appellant. Similarly, Parent Teacher Council also do not level any allegations upon the appellant regarding any type of embezzlement rather they have submitted their statement on oath before the Inquiry Officer as well as before the respondent No.4.

(Copy of the statement on oath of the members of Parent Teacher Council is annexed as Annexure "W").

c) That Parent Teacher Council was already in existence when the appellant was transferred to the Govt.

Primary School Pludran and an account of Parent Teacher Council was already opened in Habib Bank

Limited Kaghan Branch as a joint

Hassan

7 . {

d)

account in the name of Chairman and Secretary of Parent Teacher Council.

On transfer of appellant to Govt.

Primary School Pludran, appellant was made Secretary in replacement of previous Secretary who was transferred to other school and in the bank account name of the appellant was also entered in joint account.

That since the year 2011, a new system in the Govt. Schools was started for promoting standard of education and providing facilities to the students and in this respect, Parent Teacher Councils were constituted for which seven members are elected among the parents of students and one person from the locality Chairman and Head Teacher of the School is nominated as Secretary and PTC performs with the help of members through Chairman Secretary.

That, after the transfer of appellant in the Govt. Primary School Pludran a project of construction of new classroom of school building, construction of washrooms and construction of Water Supply Schemes were started with the prior approval and permission of respondent No.4 and to this effect, a unanimous declaration was passed by the members of PTC and the same was approved by respondent No.4. Therefore, initiation of inquiry and the impugned office order of respondent No.4 is against the facts and law and is liable to be set aside.

f) That for the construction of above stated projects, an amount Rs.8,50,000/approximately was encashed with the joint signatures of Chairman and Secretary and from this amount, construction material alongwith other articles' were

Hasan,

purchased with the signature of Chairman and Secretary through purchase receipts which are already exhibited.

governmental council which functions through Chairman and Secretary and with joint responsibility projects are started and completed. Responsibility and liability of Chairman and Secretary are provide in the booklet Module-I.

(Copy of Module-I is annexed as Annexure "X").

h) That, in booklet Module-2, management of financial matters of PTC has been provided for verification of it, third party has to be constituted.

(Copy of booklet Module-2 is annexed as Annexure "Y").

- being non-governmental council, therefore, its functions and liabilities does not fall within the ambit of Civil Servant Act and rules and its functions cannot be questioned by DEO, Deputy DEO or any Govt. official under Civil Servant Acts and Rules.
- j) That the inquiry committee constituted by the respondent No.4 was illegal and without jurisdiction and on the basis of same, issued of show cause notice as well as office order are also illegal.
- for the refund of Rs.8,50,000/- to appellant is also illegal and null and void as all the proceedings including constitution inquiry committee, sending of show cause notice and all the proceedings carried out by the respondents against the appellant are

Haisan

also illegal, wrong, corum non-judice arbitrary, fanciful, perverse, without lawful authority and are null and void.

- Secretary in financial matters and in all other matters of construction etc. in Parent Tacher Council are joint and anyone of them cannot be singled out for any action.
- before concluding an inquiry or before finalizing and passing any order against the civil servants, fair opportunity is required to be provided and before taking any final action against him, three show cause notice are required to be issued and full opportunity have to be provided to such civil servant but in the instant case, the natural principle of law was grossly violated.

Jassan

- That in the Civil Servants Act and n) Rules, no law have been provided for chalking and controlling of functions of Parent Teacher Council nor any separate law and rules have been made except the booklets which have been provided in the facts in which functions and powers of Chairman and Secretary are equal and no one could be singled out for disciplinary action.
- Parent Teacher Council has purchased construction material and performed his function with the consent and approval of Chairman and transported the material to the site and this act of the appellant was also approved/sanctioned by the competent authority i.e respondent No.4, therefore, no liability could be imposed on the appellant and all the proceedings carried out by the respondents are

Harsan

against the law, rules and regulations and are liable to be set aside.

That the so-called allegations levelled p) against the appellant are baseless. The appellant regularly performed his duties which is evident from the relevant record of the Parent Teacher Council, if, the appellant has any negligent behavior regarding his duty then the respondents have ample power to stop his salary or any other proceedings would be initiated against him but no such proceedings have ever been initiated against appellant which shows that the appellant never remained negligent in performance of his duties.

Hars an

q)

That the real facts have been concealed from the higher authorities and the inquiry officers who conducted the previous inquiry at the spot and rendered their findings in favour of the appellant but these

findings have been considered as a trash and the findings of the previous inquiry officer constituted by the respondents were set aside without assigning any reason which is also against the well settled principles of law and rules applicable thereto.

r) That the so-called inquiry which was made basis for the compulsory retirement of the appellant is wrong, illegal, against the law, rules and regulations as the appellant submitted detailed reply to the respondents but the reply, departmental appeal of the appellant alongwith inquiry report of the respondents No.7 & 8 have not been considered in its true letter and spirit.

Hassar.

well as inquiry report and show cause notice offends all norms of justice, fair play, equity and the respondents have transgressed upon their

jurisdiction while issuing the impugned office order.

- That it is also worthy to note that the respondent No.4 has not considered the recommendations of the impugned inquiry committee and rendered his own findings but the respondent No.4 has not given any cogent reasons while dissenting/ disagreeing from the impugned recommendations of the impugned inquiry committee.
- nor the respondent No.4 have rendered any cogent and confidence inspiring findings while delivering their inquiry report and impugned office order.

Hassan,

that it is also worth mentioning here that the property of Govt. Primary School Pludran alongwith its building has been acquired by the Govt. for the construction of Sukki Kinari Dam and

an amount of Rs.55,00,000/- was also issued to the Education Department as a compensation of building which can only be done due to the construction work carried out by the Parent Teacher Council on the spot.

(Copy of the extract of compensation is annexed as annexure "Z").

by the respondents without conducting of regular denovo inquiry as per directions given by this Honourable Tribunal in its judgment.

Therefore, impugned office order was passed by the respondent No.4 in violation of the judgment of this Honourable Tribunal.

Hassan

non-supplying of copy of inquiry report before passing of impugned order is not only violation of the direction of this Honourable Tribunal which was given in the judgment but

also against the law and rules. Thus impugned office order is void, without jurisdiction and not sustainable.

- witnesses were recorded in presence of the appellant nor the opportunity of cross examining the witnesses were afforded to the appellant and all the proceedings were conducted by the respondents on the back of the appellant which are also against the well settled principle of law of natural justice that no one should be condemned unheard.
- z) That the other points will be agitated at the time of arguments with the leave of this Honourable Tribunal.

Hassan.

It is, therefore, respectfully prayed that on acceptance of the instant service appeal, the impugned show cause notice bearing No.6323/Lit dated 24.06.2021 passed/ issued by respondent

No.4 and on the basis of same so-called inquiry report dated 10.06.2021 prepared/ issued by the respondents No.7 & 8 alongwith the impugned office order bearing No.10377/Litigation/S.A # 696/2018 dated 04.09.2021 passed/ issued by the respondent No.4, whereby, the appellant was compulsory retired from the Govt. service, further amount of conditional grand outstanding against the appellant amounting to Rs.8,50,000/- was also ordered to be recovered from the appellant and be deposited into the govt. treasury immediately may please be set aside and the appellant may graciously be reinstated into service with all back benefits and the order of recovery of Rs.8,50,000/-may also kindly be set-aside.

Dated: **25/9** /2021

Through

Hassan_

(JUNAID ANWAR KHAN)
Advocate High Court, Mansehra

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

...APPELLANT

Hassan

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No.	/2021
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Mian Muhammad Hassan son of Mian Mehmood, resident of Shahotar, Tehsil Balakot, District Mansehra, Ex-PSHT, Govt. Primary School Pludran, Circle Kaghan, Tehsil Balakot, District Mansehra.

...APPELLANT

Hassan

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar & others.

... RESPONDENTS

ATTESTED

SERVICE APPEAL

MIAN MUHAMMAD FIAZ Advocate High Court OATH COMMISSIONER Balakot

AFFIDAVIT

I, Qaisar Ali son of Aurangzeb, Ex-Field Worker, Agriculture, Kala Bagh, Nathiagali, resident of Village & P.O Tatreela, Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.

DEPONENT

0.Order No_201_ Dated: 16/9/1989.

APPOINTMENT:

As recommended by Mian Wali ur Rehman M.P.A and approved by Muhammad Afsar Khan Chairman D.D.A.C Mansehra the following Candidates are herby appointed as Primary Teacher in BPS-7 (RS.750/--PM fixed) plus usual allowances as admissible to them under the rules in the interest of the public service with offset from the date of their taking over charge.

S.No. Name, Father's Name & address.	School where	Remarks,
	appointed.	
1. Mohd Baroog S/O Mohd Ismail	GPS Naka Jareed	Agst: V/PTC Post.
R/O Mang (Balakot)		
2. Mohd Miskeen S/O Ibrahim R/O	GPS Ghanila	-qo-
Batkan Cum Ghaniala		
3. Mr. Abdur Reshid Mian S/O Khan	GPS Prori	-do-
Mohd Mian R/O Jochia		
4. Mr. Junaid Khan S/O Azizur Rehman		
R/O Ochri	GMS Ochri	-do-
. 5. Mr. İmtiaz Ahmad S/O Jia Khan	GPS Batta Kundi	-do-
R/O Batta Kundi		
6. Mr. Ghulam Nabi S/O Mohd Yaqub	GPS Noori Bala	-do-
R/O Mandi Cum Jiggal.		
7. Mr. Habibur Rehman S/O Biro R/O	GPS Kawai	-clo-
• Darra (Shohal)		
8. Nian Mohd Hassan S/O Mian Mehmood	GPS Serion	-(10-
R/O Shahtar (Garlat).	(Balakote)	
9. Mr. Aurangzeb S/O Nabiur Rehman		
R/O Mishala Manoor	GPS Bala Manoor	-do-
10. Mohd Sadiq S/O Abdul Qayyum	GPS Sangar	-40-
R/O Kanshian (Balakote)		
11. Mr. Ghulam Jan S/O Gul Zaman	GPS kawai	-40-
R/O Shangri (Balakote)		
12. Mr. Aneyetur Rehman S/O Sarder	GPS Khola	-do-
Abdur Rehman R/O Khola		
13. Mohammad Ashiq S/O Mohd Miskeen	GPS Jebri (B/Kot	e) -do-
R/O Garlat		

Contd: Page No …2…

Hassan

Printing Marketha

No:- 1. Charge report should be submitted to all concerned.

- 2. No TA/DA etc is allowed to anyone.
- 3. They should not be handed over charge if their

 Age is below 18 years and above then 25 years.
- 4. Their original certificate may be checked before Handing over charge.
- 5. They should produce their age and health certificate.
 From Medical Supdt: DHO. Hospital Mansehra.
- 6. The appointment is purely temporary & ell able to be termination at any time without any reasons.
- 7. Other terms and condition is laid down in the service rules.

(KHURSHID AHMAD)
DISCTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

Endst: No 1/70/-29 III Dated Mansehra the 16-9- /89.

Copy of the above is forwarded for information and

necessary action to the:-

- 1. Mohemmad Afsar Khan Chairman. D.D.A.O Mansehra.
 - 2: Mian Waliur Rehman M.P.A N.W.F.P.
 - 3. Sub Divisional Education Officer (Male) Mansehra.
 - 4. Head master Govt: Middle School concerned.
 - 5. Headmaster Govt: Primary / Moauq School concerned.
 - 6. Candidates concerned.
 - 7. .0. File.

DEPUTY, VEDISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

Hasan





ANNEXUYE

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) DISTRICT MANSEHRA

"B"

ECHFICATION:

In pursuance of Government of Khyber Pakhfunkhy. iementary & Secondary Education Department Notification No SO (B&A)/1-18/E&SE/2012 and Fine ice Department Notification No SO(FR)/FD/10-22(E)/2010 Dated 16/07/2012 and subsequently Notification issued by the District Education Officer (Mile) Manisehra Endst: No 17669.75 Notification PSHT Dated 19/11/2015; the following Primery School Flead Teacher 8-15 are adjusted against vacant post of PSHT (B-15) with the following terms & conditions given below with effect from the date of their taking over the charge

\$.#	S.L.,N	NAME OF TEACHER.	NAME OF PRESENT SCHOOL	ADJUSTED SCHOOL
1	381	MALAK AMAN	GPS BAJNA MERA	GPS GHAFOOR JABRI
_2	060	MUSHTAQ AHMAD	GPS KULHARAY	GPS KULHARY
3	1515	MIAN M. HASSAN	GPS BATTA KUNDI,	GPS PHULDARIAN
4	1527	MUHAMMAD ISRAR	GPS RIAZ ABAD , ,	GPS CHACHIAN
	1521 B	Muhammaci Sadiq	GPS GHORY PHER	GPS TOOT NAKKA
6	1594	MUHAMMAD RAFIQUE	GES BANI KARNOL	GPS SINGAL DHERE
7	1641	M NASEFR KHAN	GPS CHOMBORA	GPS BANDA SACHAN
	1642	SHAHID SHUJA UZ ZAMAN	GPS PANO DHERI	GPS CHAMARSI
9	1643	MUHAMMAD RIAZ	GPS TANOHÀ	GRS BATKARAR
10	1644	MUHAMMAD IRFAN	GPS KANCHIAN BALA	GPS BATSAHGRA
!i_	1645	ANJUM SARED	GPS BAFFA MARA NO 1	GPS SARYALA
10	1647_	MUHAMMAD MUSEITAQ	GPS BOLI	THANCA KATHA
13	1648	SHAKIR ULLAH	GPS KULARY WEST	TO HATSE WEST .
	1650	LE MADEEN MUSICALITY	GPS DAMMORI	GPS SATI
15	1651	STREET.	GPS DHODIAL	GES TAR MANIPAEWOUN
15	1652	MOHAMB AKBAR	SPS TANDA	GET BHANDAR
17	1653	ISHFA@ HUSSAIN SHAH	GPS TALHATTA	GET NAD HARD
18	1654	LIAQAT HUSSAIN SHAH	GPS KOTKAY	MARIORIAN
. 19	1656	SHAH NAWAZ	GPS SHAMDHRA	SHANDHRA
20	1657	ZAHID JAMII.	GF) SHOCIAL MUZULA	SESHARBANDA .
45.	1858	SISA GILAG	GPS NARAN	CASINGRAN
22	1659	AFTAB HUSSAIR	GES PATLANC TREE	SCOUNAMBER NARAN U
	1661	AURANG ZEB	GPS KHANIAN	GEODHANI KAMALBAN
23	1662	MUHAMMAD HAROON	GPS KHARAR MARA	GP KANGAR DOGA
25	1670	AKHTAR ZED	GPS Q ZI ABAD	GPS EAIR PAIN
1 30	1719	HAZARAT JALAL SHAH	GPS JISKOT	PS JALGALI
27	0.31	NAZ AR SHAH	GPS SHAHTAY 1	58 PANJOOL
28	1082	ABDUL SABOOR	GPS JABORI	GPS CHALYANI
29	1635	HAME KHAN :	GPS MALIK PUR	GPS MOKOT
<u>30</u>		ABBUL HAYEE ABID	GPS DH O DIAL	GPS BAKKI F - LLA
31	1537	MUHAMMAD ARIF CHAN	C 'S MAKHRA BALA	GPS PANJOOL BELA
<u> </u>	1688	MOHAMD JAVED	GPS SHATAY LO 1	GPS JACHA NO 1



Hassan

	ا			i
33	1: 39	S/ CHAWAT KHAM	GPS NAWAN SHER	GPS REEN BANDA
.34	1391	SIBCHAT ULLAH	GPS SYAMALBOOY	GPS GHAZIKOTI
	1692	M.ALAM KHAN	GPS BATTAL	-
	<u>. 1693</u>	YAR MUHAMMAD	GPS BAILIAN	GPS SERI BELA
37.	1694	RAB NAWAZ	GPS CHAJJAR PAIN	GPS LUNDI TARLI
.39	1695	FIF AMU JAMMAD	GPS TARAWARA	GPS BEERIAN
111	1696	ANVAR ZAIB	GPS RIAZ ABAD	GPS BATTANG!
-40-	1698	DILDAR HUSSAIN SHAF	000 1101	GPS CHAKAL BALA
.11.	1701	CHAN ZEB	GPS CHIRI KOT	GPS NARAL BAN
.43.[1702	MUHAMMAD ARIF		GPS K@CHATTI
43	1704	ZUDAIR MUHAWMAD	GPS SHADORE PAIN	GPS SHADORE PAIN
34.	<u>1705</u>	MUHAMMAD BASHIR	GPS GALLIAN	GPS DHAIR
<u> 15 </u>	1706	MUHANMAD FARAZ KHAN	GPS DILBØRI	GPS MALKANA
46	1707	UMER FAROOD	GPS TARLAL	GPS ASHIWAL
47	17.10	MUHAMHAD NAZIR	GPS KARORI MIANA	GPS KARORI
<u> 18 </u>	1712	SAIF UL AKEUK	GPS OGHI NO. 1	GPS ARBORA
49.	1719	BAKHTIAR I TALIK	GPS E VIIAN	GPS NAMSHRA
50	1720	SHER MUHAMMAD	GPS NARADOGA	GPS CHEENA GHAZIKOT
<u> 5i j</u>	1702	MISAR HUSSAIN SHAH	GPS DHAMBORI	GPS BHOSUM
.53	1725	MUHAMMAD IRFAN	GPS TANOHA	GPS NAROLL
53	1729	MUHAMMAD ILYAS	CPS GHAINIAN	GPS JEEMANG
tai į	1730 [MULAWMAD SADIO	GPS MITTI KOT	GPS:SAWAIN
<u>55 </u>	17'5	M. NAWAZ KHAH	GPS SHULAHORISH	GRAJABIJI NO 2
56	1738	MIR BAD SHAH	GPS TRARAY	A COMPANIES OF THE RESIDENCE OF
<u>57.</u>	1744	SHER AFZAL	GPS KHARYALA	GPS KALEE GEETTI
<u> </u>	1746	MUHA IMAD RIAZ	GPS OCHI NO. 1	GPS SUFFAIDA BALA
<u>50 [</u>	. 17-40	S. H. P. S. P. Series	GPS GARHTHADIB ULLAH	GPS RAWAL KOT NO DA
co 	1749	Material Man Swelly	GPS AND ARIBALA	GPS KORI KAGHAN
<u> </u>		ASEEDZAR	GPS CHAVARIPAIN	GPS HAWA GALI
62	1752	MUHAMMAL SI DULLAT	GPS BHERIOUND	G . SATLA PAYIAN
<u>60 </u>	1755	MUHAMMAD ZUBAR	GPS BHATIAN	GPS SHUKHRA
<u> </u>	175t:	MUHAMMAD G. L. ZI	GPS HAKKIAN PARAS	GPS PHAGNA
GC;	!759	SHAMS UR REHMAN	GPS POTHA	GPS DANA SARELAND
(is i -	767	CIAIM! AHE A LAT	GPS BANPHORA	GPS KUNGA
37	1774	DILAWAR KHAN	GPS TEER BAT	GPS SEHRA GALI
<u> 16</u>	1775	MOHAMD HAROO!		GRSCHINAR KOT
<u>G9</u> _	1777	IKHLAO HUSSAIN SHAH	B.1.5	GPS-BECA MANOOR
70	1782	HADAYAT ULLAH	GPS SERIAN	SPS GHAPRA CHOSHIL
7.1	1783	MUHAMMAD ASHRAF	GPS GHORI PHAR	GPS GUL DHER!
7.2	1784	SAJAD ALI	GPS BASUND	GPS TARHERI
". <u>:</u>		M' MTAZ IMAD	GPS SHALIA	GPS PAKHER KHUI
· i	12 27 ()HA MIE	GPS KODAR	GPS GORI KHURD
75	<u>179t</u>	(SHAD)	GPS BANDI SHUNGLI	GPS DALBALA
7:1	}	C LMA GAMMAHUM	GPS L/BOR KOT	GPS SHALL DADAR 7
<u> </u>		MAC OOL UR REHMAN	GPS MAPTHISARACH	GFS CHOKANA
		MUHAN" IAD SIE DIQUE	GPS PATLANG	GPS NALLA HANGAL
; ; I		The British Color and American Color and American Color	44, 41, 42, 43, 44, 44, 44, 44, 44, 44, 44, 44, 44	***
1.		GAVELSEE IN LID OIN ARSHED	GPS :ANDI SHUNCLI	GPS PHOGORA
		MIL SULTAN	GI'S SEEKI BALA	GPS PHOGORA GPS JABA YAQOO8

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31 1802	1 1UHAMMAD JAVED	Part and the same	The state of the s	ALC: N
(11)		GPS SHAROTA	GPS SHARHOTA	
<u>82 1803</u>	ABDUR RASHEED	Philippin the Colon Colon Colon		雅诗
00 1		TOT O TRANSPOR	©PS CHAKLI SARAI	i d
<u> 83 11.J9</u>	MUHAMMAD JAVED	GPS BAI BOMAL	GPS CHAKLI ILYAS	`
			OF A CHARCE SERVE	- 1

TERMS AND CONDITIONS:

They would be on probation for a period of one year extendable for mother one year. ï 2.

They will Le governed by such rules and regulations as may to issued from time to

Their service can be reverted at any time, their performance is found unsatinfactory during probationary period. In case of mission duct, they shall be 3. prece. ed under the E&D Rules 2011. .1.

Charge report should be submitted to all concerned.

Their inter se Seniority on lover post will remain intact. 5.

No TA/DA allowed for joining his duty. [Ű.

They will give an under taking to this effect to be recorded in their service Book.

DISTRICT EDUCATION OFFICER (MALE) MANGEFIRA

Notification PSHT Dated J

Copy forwarded for information and necessary action to the:-

The Director E&SE Whyber Reichtunkinwar Peshawar

Der ity Genvissioner Manschia.

4. Dis. ic Jaitening Officer Mansehra.

Deputy District Lettention Officer (Male) Mansehra. 5. G.

Sub Divisional Education Officer (Male) Mansehra.

7. Office order file:

> SUB DIVISIONAL EDUCATION OFFICER (MALE) MANGET RA



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

NOTIFICATION

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No SO (B&A) /1-18/E&SE/2012 and Finance Department Notification No SO (FR) FD/10-22 (E) 2010 Dated 16/07/2012.

In the light of Order Endst: No 2405-9/F.No.7/PST (M) Mansehra Dated Peshawar the 11-03-2015, Office of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar on acceptance of appeal, in r/o Mr. Mian Muhammad Hussan PSHT GPS Pludran Circle Kaghan is hereby allowed for promotion B-14 To B-15 according to seniority list, because he deferred in DPC on 27/02/2015, this office Endst: No 17669-75 Notification PSHT Dated 19/11/2015 at S.No 4, his promotion is considered from the date of 2nd Promotion i.e. 27/02/2015, with back benefits.

Note: All the entries to this effect should be made in his Service Book and other relevant record.

— SoP —

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No _____

4769-73

_File No 32 Promotion PSTs Dated

19-04/2016

Copy for information to the:

1. Director Elementary & Secondary Education Khyber PakhtunKhwa with reference to his No 267/F.No 162/Removal from Service PST/TT/AT/QARI (M:Gen) Dated 02/03/2016.

- 2. District Accounts Office Mansehra.
- 3. SDEO (M) Circle Mansehra.
- 4. Teacher Concerned.

5. Office Copy.

DY: DISTRICT EDUCATION OFF

MALE) MANSEH

Wright Berend

Hassan

الكو مي دوم) ربورٹ ک رشتی پیسکول انقارق نے مجارروان کی رائے کے ربورے معاشر Chang da ching Either will 10 de 19/07 2/10 de 19/07 2/10 - de for for July make for the one i wind out of the Made of Little & Mar wiedle - E El Scher M 5/10-411- 3rd- 2nd- with 1518: 12 /18/010. 24 6/8 10/13 12/3 16/16 24/24 Talal 70 المان من المان الم july 2 2 6 6% - Ubed MA 11 - e 2 1/2 6 60 / MG31 627 12 1 - 20 10 15015 20 - 10 10 1- 101 1 - 66 July (8. W. W. J.) A. 146 F. 2 C. W. Look 1/1/1/200 WW 经 B 5 77 196 222 1-5 GMS WELL WISSELF COUNTY OF PORTE

التصدوم) رلورٹ کی روشنی میں سکول انتخا نے جو کاررواق کی رائ ريورك معامد UTOLING JUS or wind by my brujuing IL LOSS WICE 1. 6 4 6 4 4 4 5 5 6 6 5 -# 21 or operful full - 1 for المراتم الولي سوافف س الريس معلى المولان الريس pointe de dust mel e - LOS/ 16 - -3 - 4 3 10 100

Brobs al Ju 3102762 Some Colored En Word ما مام برداه من کے ۔ انباک - 1- 30 (B) db cb. Ev. ره فرس ک- اورکوی کی دور estilité e 15-2/2 الريروري لم خطا بره مي أ ركي لتر مطلور تما عم 10 July 20 1 100 1 المرك والمره عدى واطرز عراميا. e 16/5/1/2) Mein Gen ADO 23/10/07

ر بورٹ کی روشنی میں سکول انھار کی نے جوکا دروائی کی الام معا من كر من في مراك ميل ميلوال مراه 25 على معرف المرابع المرا معلى من مدما تعامل ك اذك مرى حمرا مع ما موم ما تا منال فان آءم در جولسر ملان عام فرمر مرار معرف کاریائے۔ 5/h 4/h 3 al 2 of 18/A 18/13 Tolar 1/4 USO 60 7/2 60 8/10 1/5 /11 /17 1/63 des Damaje e e aisi est ع مزمر عد بى موجور يى . ونارد در احرا در فافری در مورکی فلار نحد - 92 روع مِلَ بِي جُودِورِانِ وَرِيالًا إِلَى وَرِينَ الْ تعبى ما رم الم المجم عدي الم المان المكان ام م بدرال می لید کی جور ایم طیعا جماعت جمام کے ملی وکا فیلی کرسری وزن کی جائزه ما ما دساء رسام من كمروريات عبد ارد , معالى يرمالى ملى الح

ربورف کارشنی پیشکول انقارق نیجارروا ل کی رائع إر ديوريط بيعامر ی نی طانع ریا می می منزور بات داریزی بر منے میں بونالعام بر مزیر منٹ یا مے۔ مول جائد ووئم کے ماس کا جنی حا اگر ہ ساک محنیث فموعی طلباء مسلی بخش ہے۔ ادل رسلی وادنی کے ملائد کا بس جا کرہ یہ تبها لملها سرم تولى حومتحلي امرحروف المامي ل درائد- سرحر رسائلره منا می توسی یا م يامية عام كما عن فعادن عاصل إ. العبرى عاتى مع أمرين دائي عام كر حد ر رزق علول کرتے ہوئے جوں کا تعلی عالت کو بیزے لیے بنا نے کی بوری ہوئے رس کے سرو بردرمعلین کورٹل کی سالا فر افت (مر ایمان کی روتی می شیم کا المان کر دنی میرس میری می جائے نقول ریگ کی متعلق د تمانز کو اربهال کی جاکش

الك الكاف الكاف المحتمدوم) كالم ربورٹ کی روشنی میں سکول انتقاد ق نے جوکاررواق کی رائے رابور ط معاشد 84 find aps in which مان درور کول مرا یا ماندم جعید درمال ما جي مرن ته روره يو رو ل مدار درام سرم الروعي كارباء -5/8 1/4 3/14 5/10 1/10 1/6 4/6 - Les Danage Les distributions de ملید می ملے تھے میں فی صوفے می او درے مام یں 1, 1, 19 0, 00 0 646 0640 Cipin 10 Plans -66 16 w 94 6 83 for 3 deily Wolle wit with it is 23/13 JUNE 575 de 6 w 2008 6 2005 de رسی جانوی کی کراری کا فراری و زیانی جانوری کا e 4 66 2 9 000 000 if it is in the contraction of t

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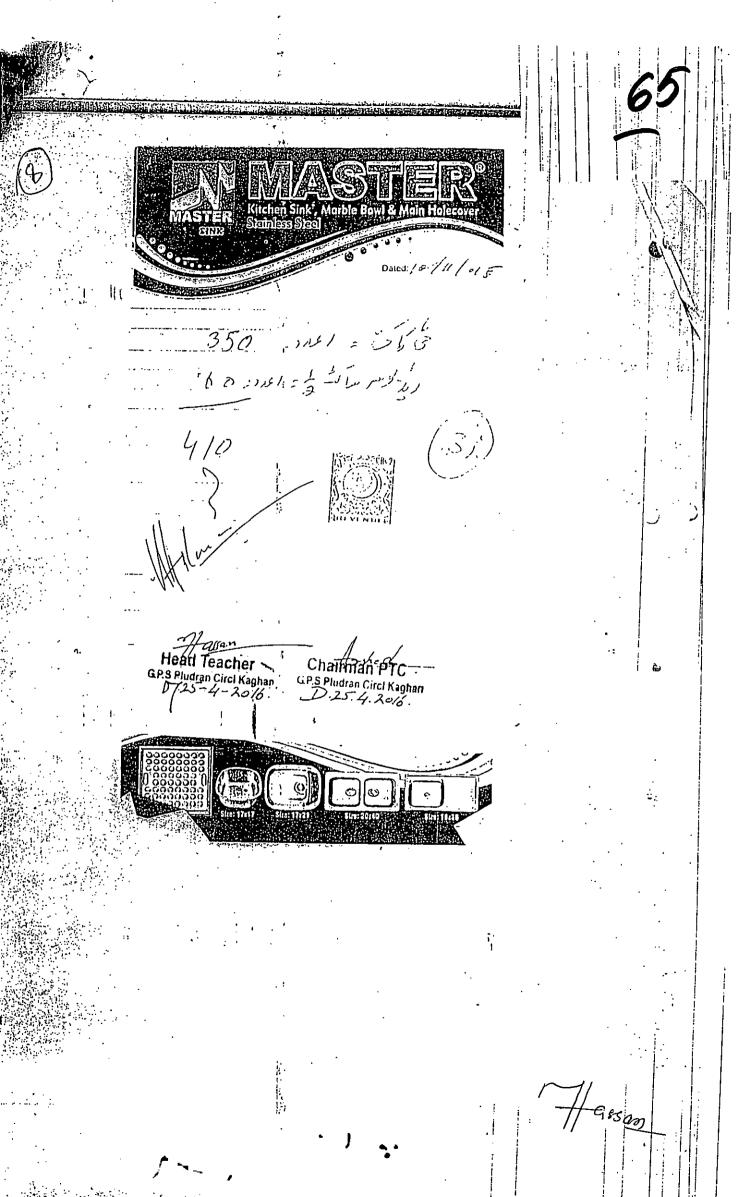
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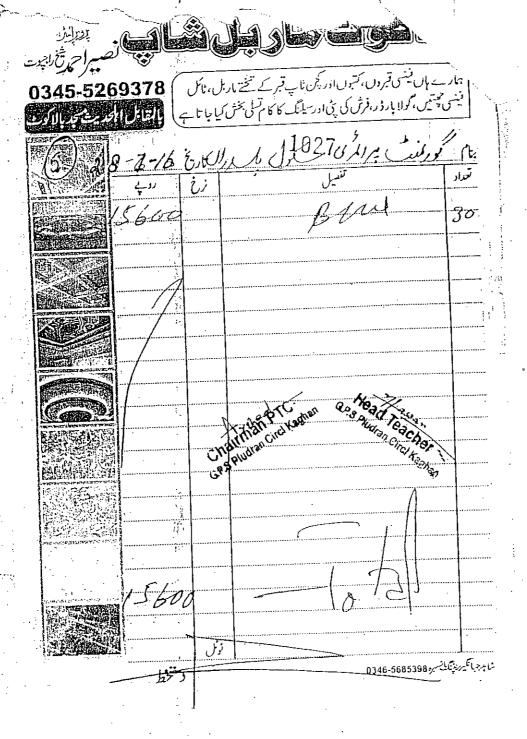
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Date 28-01-2016.



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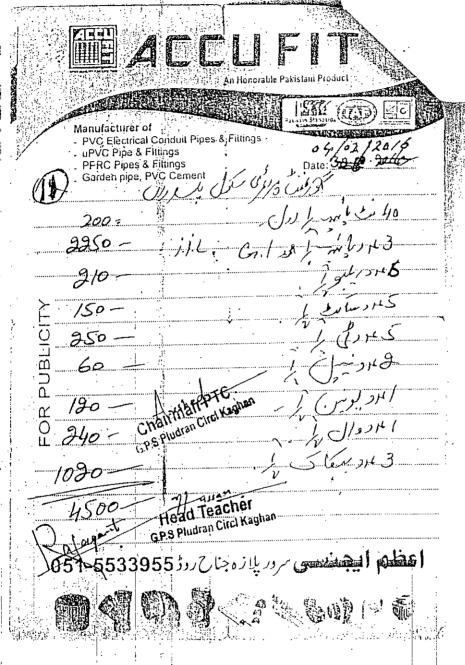
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Parent Teacher Council (P.T.C)

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تفصیل اخراجات برائے کئر (قان در ۱۹۳۵ PTC ورنمنٹ پرائمری سکول ملر اراز کا کا کا خصیل بالا کوٹ ضلع مانسمرہ

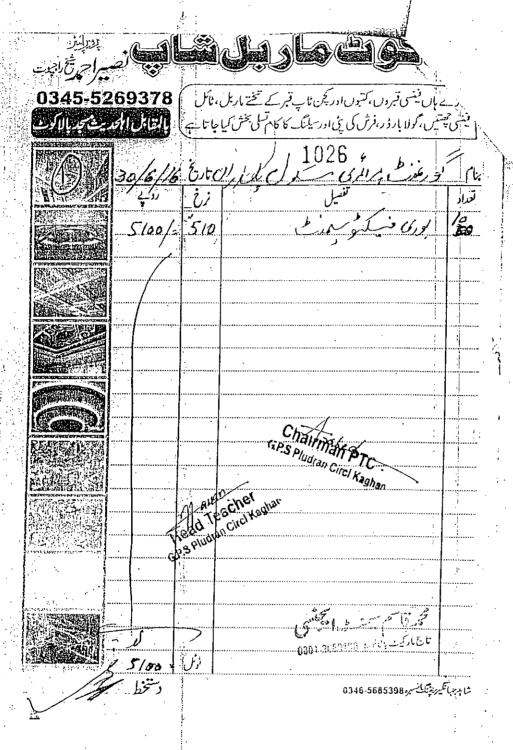
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	• ,			L		ستان	ادكر(سول) درمياندما تزماخته يا	14
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					رجنر ليكر داراساده	25
:		:			رجشر دالمل فارج	26
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ŀ			7 7		سٹاک دجٹر	33
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	,				المنز (يرش كرزا)	35
				:	ف جتی درمیانهائز ،	36
		į.		7	بالني جشتى درميانه مائز	37
-	:				وافركولر بإاستك	38
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-					المالان المالي	40
-	1000	St	20	1	جماڑ د	41
-	1.00		<u>`</u>	4	انخورا	42
-				6.15 6.15 6.15 6.15 6.15 6.15 6.15 6.15	ليني الم	43
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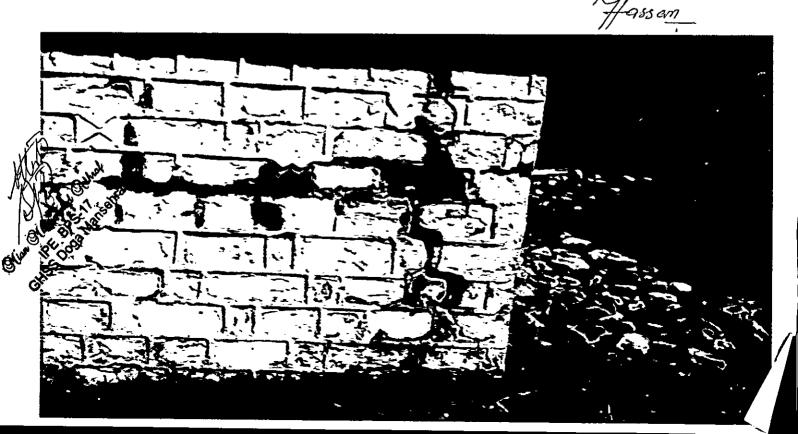
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				و الريش	51
	2/0	70 J	33	· · · · · · · · · · · · · · · · · · ·	52
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				با کار بختر	54
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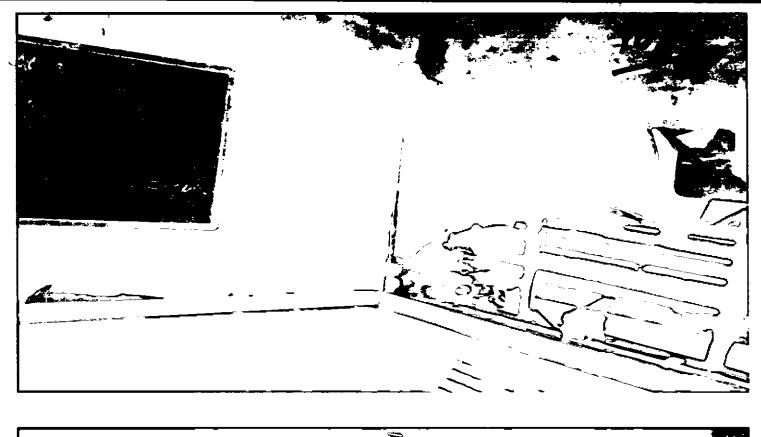


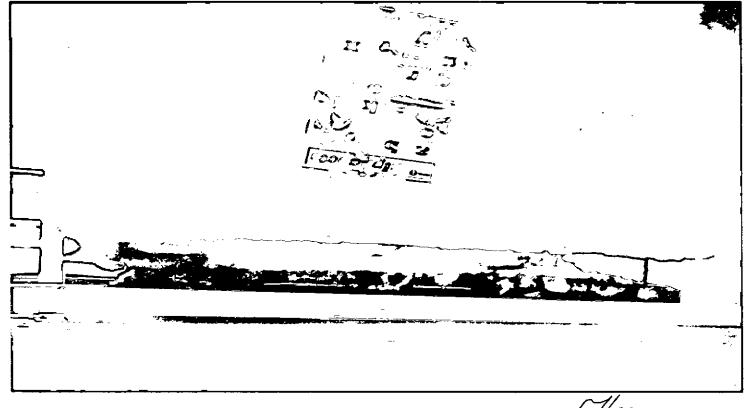










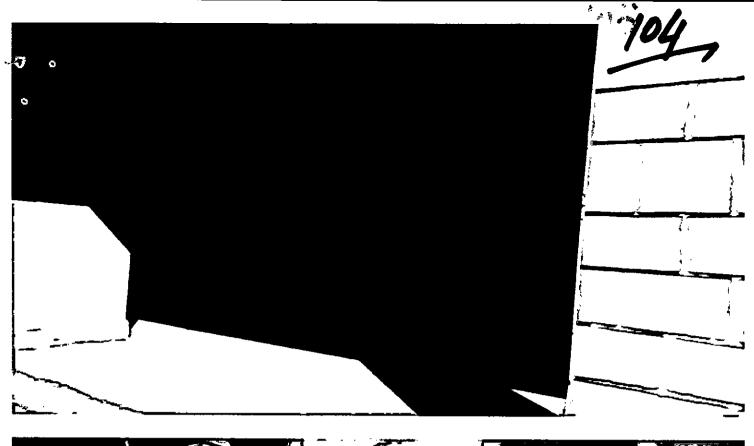






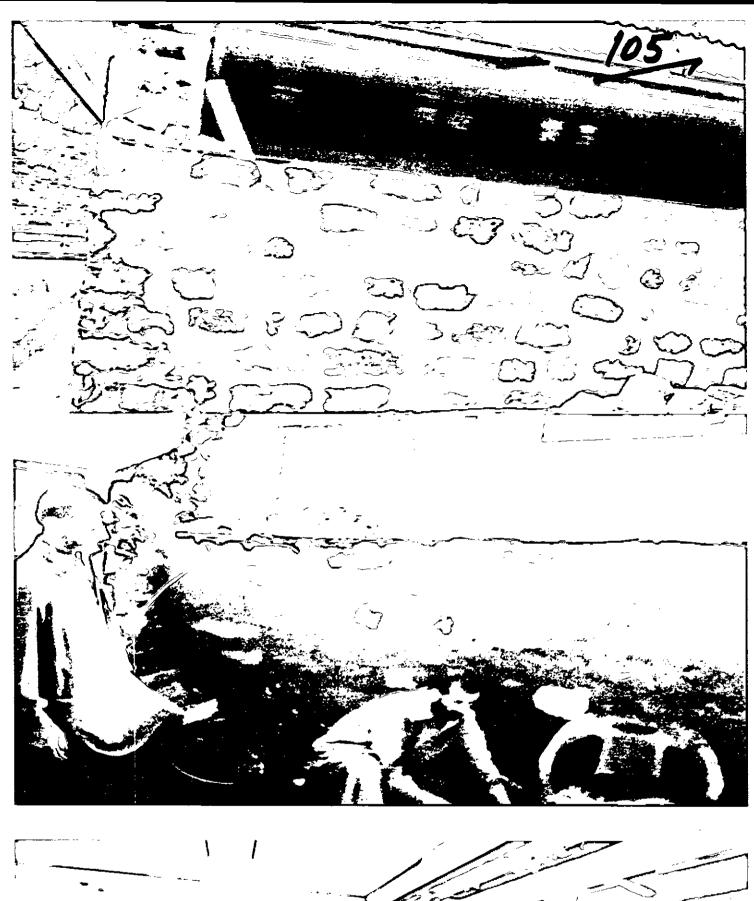




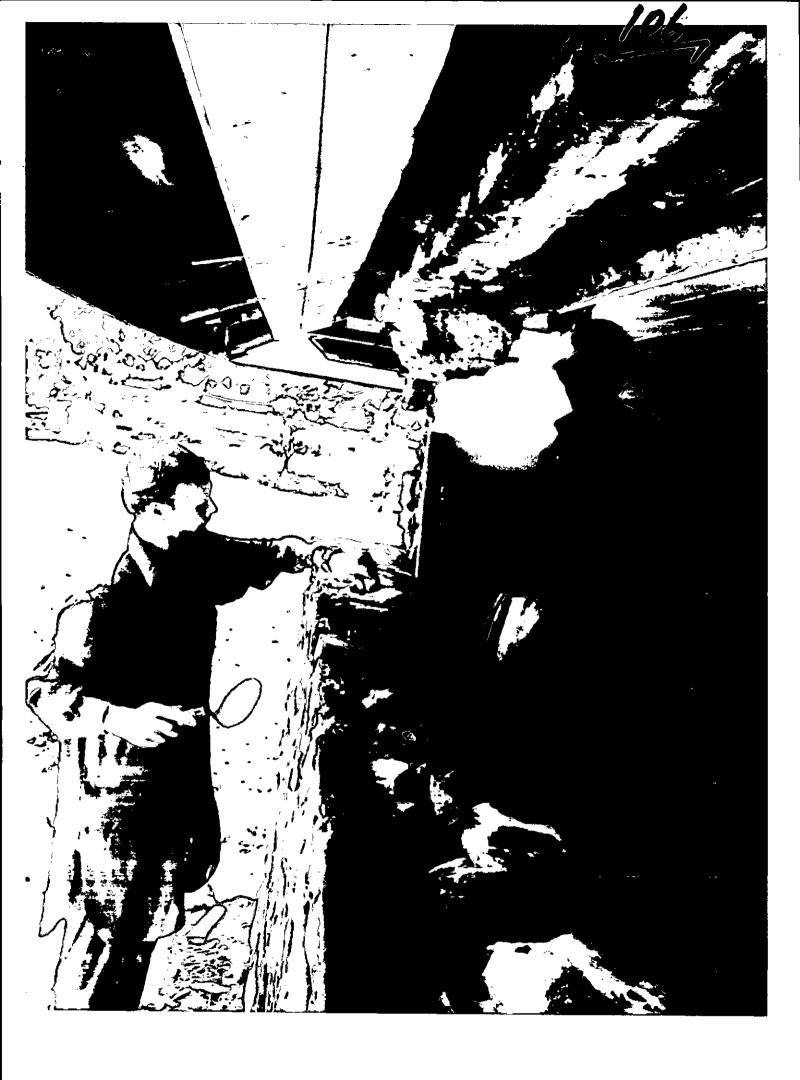












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