


22nd July 2022 None for the appellant present.


Notices were direct to be issued to the appellant and her counsel but those were not issued. Office is directed to issue fresh notices to the appellant and her counsel. To come up for preliminary hearing on 23.09.2022 before S.B at camp court Abbottabad.


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

23.09.2022

Appellant in person present and submitted Wakalat Nama in favor of Allah Yar Khan Advocate.

She made a request for adjournment as her counsel is not available today. Adjourned. To come up for preliminary hearing on 18 / 11 / 2022 before S.B at Camp Court, Abbottabad.





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

[Faint handwritten notes in Urdu script, likely a court record or case file entry, located at the bottom left of the page.]

FORM OF ORDER SHEET

Court of _____

Case No.- 7849/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/12/2021	<p>The appeal of Mst. Faiza Bibi resubmitted today by Mr. Sardar Shahzad Akbar 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-		<p>This case is entrusted to S. Bench at Abbottabad for preliminary hearing to be put there on <u>30/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	30.12.2021	<p>None is present on behalf of the appellant. Notice be issued to appellant and her counsel for the next date. Case to come up for preliminary hearing on 18.02.2022 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp Court, A/Abad</p> <p><i>18-2-22.</i> <i>Due to retirement of worthy chair-man case is adjourned. To come up for the same on 22-7-2022.</i></p> <p style="text-align: right;"><i>Read</i></p>

The appeal of Mst. Faiza Bibi D/O Musharraf Hussain, DM GGMS Ali Abad, R/O Bhair Kund, Tehsil and District Mansehra received today i.e. on 23.11.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Checklist is not attached with the appeal.
2. Appeal has not been flagged/marked with annexure marks.
3. Copy of order dated 12/12/2019 mentioned in heading of the appeal is not attached with the appeal which may got be placed on it.
4. Annexures of the appeal may be attested.
5. Copy of Annexure B, C, D, F, G, J, M, P attached with the appeal are illegible which may be replaced by legible/better one.
6. Nine more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2331 /S.T.

Dt. 23/11 /2021

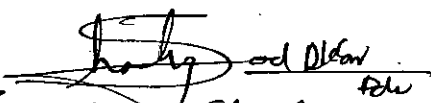

REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sardar Shahzad Akbar Adv.
High Court, Abbottabad.

Respected Sir,

The objection raised above are being removed and the instant appeal is resubmitted for fixation before the Tribunal for preliminary hearing/arguments.

Dated: 06 12
2021


Sardar Shahzad Akbar
Advocate High Court

Note: Copy of order dated 12 12
2019
Letter No.: 5122-25/F No 362
is Annex - Q Page 50

ATD
SARDAR SHAHZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Mrs. Faiza Bibi vs Director ELPSE

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Sardar Shahzad Akbar</u>		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
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?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the 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?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?	✓	✓
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 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		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Sardar Shahzad Akbar

Signature:

Dated:

08/12/2021

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR CAMP AT ABBOTTABAD

Appeal No. 7849/2021

Mst. Faiza Bibi

...APPELLANT

VERSUS

Director of Elementary and Secondary Education, Khyber Pakhtunkhwa,
Peshawar and others

...RESPONDENTS

APPEAL

INDEX

S.No	Description of Document	Annexure	Page No.
1.	Appeal alongwith Verification, affidavit and Certificate	--	1-15
2.	Copies of appointment letter No.280-85 dated 02.18.2009 and letter No.628-33 dated 02.12.2009.	"A" & "B"	16-17
3.	Copies of Letter No. 8418-22 dated 22.11.2010 and Letter No. 2238-42 dated 27.07.2012 and	"C", "D" & "E"	18-25
4.	Copies of Show Cause Notice, letter No. 7033 dated 28.04.2015 and Reply of Show Cause Notice	"F" & "G"	26-28
5.	Copies of enquiry report, Letter No. 245 dated 18.01.2016	"H"	29-33
6.	Copy of Letter No. 2863 dated 04.09.2018 alongwith enquiry report	"I"	34-37
7.	Copies of Letter No.1284 dated 17.09.2018 and Letter No.5198 dated 14.03.2019	"J"	38-39
8.	Copies of Letter No.504 dated 08.06.2020 and Letter No.5166 dated 13.09.2019 alongwith	"K" "L" & "M"	40-42
9.	Copy of letter No.5219-20 dated 10.08.2020	"O"	43-44
10.	Copies of departmental appeal dated 27.07.2021	"P"	45-49
11.	Vakalat Nama and order dated 12-12-2019	Q	50-51-b

Through:

Faiza APPELLANT

Dated: 23/11/2021

(SARDAR SHAHZAD AKBAR)

(BABAR SHAH TIRMIZI)

Advocates High Court, Abbottabad

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR CAMP AT ABBOTTABAD

Appeal No. /2021

Mst. Faiza Bibi D/o Musharaf Hussain R/o Bhair Kund, Tehsil and
District Mansehra, (DM, G.G.M.S Ali Abad, Abbottabad)

...APPELLANT

V E R S U S

- 1) Director of Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2) Deputy Director Female, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3) District Education Officer (Female), Abbottabad.
- 4) Deputy District Education Officer, (Female), Abbottabad.
- 5) District Education Officer (Female), Mansehra.
- 6) Deputy District Education Officer (Female), Mansehra.
- 7) District Education Officer (Female) Kohistan.
- 8) District Accountant Officer Abbottabad.
- 9) Deputy District Account Officer Abbottabad.
- 10) Govt of K.P.K. Through Secretary Education K.P.K ...RESPONDENTS

Medto-day
Registrar
23/11/2021

APPEAL U/S 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974 READ WITH
OTHER ENABLING PROVISION OF LAW
AGAINST THE OFFICE ORDER NO.52-19-20

DATED 10.08.2020 VIDE WHICH THE RESPONDENT NO.3 HAS INSTEAD OF MAKING ADJUSTMENT OF APPELLANT AT DISTRICT ABBOTTABAD AS PER THE DIRECTION OF RESPONDENT NO.1 NOT ONLY DECLARED ORDER NO.5122-25/F. NO.362 DATED 12.12.2019 AS INFRUCTUOUS AS WELL AS MAY BE CONSIDERED AS NULL AND VOID AND THE DEPARTMENTAL APPEAL NO.799 DATED 27.07.2021 AGAINST THE SAID ORDER SUBMITTED TO THE RESPONDENT NO.1 AFTER LAPSE OF SUFFICIENT TIME THE FATE OF THE SAME IS NEITHER DECIDED NOR CONVEYED TO THE APPELLANT.

Respectfully Sheweth,

1. That the Appellant was appointed as Primary School Teacher (PST) BPS-07 in G.G.P.S Banseri, at District Kohistan vide appointment letter endst No.280-85 / dated 02.02.2009, however, the cadre of the appellant was changed from PTC to DM (BPS-9) by the competent authority vide change of cadre endst No.628-33 dated 02.12.2009. (Copies of

appointment letter No.280
02.18.2009 and letter No.628-dated
02.12.2009 are annexed as Annexure
"B" respectively)

2. That later on the appellant was transferred on her own Pay Scale from G.G.M.S Soyal Joshai and adjusted at G.G.M.S Jalkot vide letter endst No.8418-22 dated 22.11.2010 and thereafter the appellant was again transferred from G.G.M.S Soyal Joshai District Kohistan and adjusted against the vacant post of DM at G.G.M.S Aliabad, Abbottabad vide letter Endst No.2238-42/F.No.167/9 dated 27.07.2012 by competent authority. (Copies of Letter No. 8418-22 dated 22.11.2010 and Letter No. 2238-42 dated 27.07.2012 and relevant extract from service Book are annexed as Annexures "C", "D" & "E" respectively)
3. That after transfer to District Abbottabad the Appellant had tried her level best to assume charge on 02.08.2012 reported to the concerned D.E.O Abbottabad, but with regret, neither appellant was allowed to assume charger nor

her arrival report was accepted at Abbottabad, therefore, the appellant in such a compelling situation herself reported the matter to the D.E.O (Female) Abbottabad when the appellant was refused to assume charge by the I/C G.G.M.S Aliabad in the month of January 2013 and in this way a show cause Notice was served through the Head Mistress G.G.M.S Aliabad on the appellant vide letter No. 7033 dated 28.04.2015 where after the written reply of show cause Notice was sent by the Appellant to the Respondent No.3. **(Copies of Show Cause Notice, letter No. 7033 dated 28.04.2015 and Reply of Show Cause Notice are annexed as Annexures "F" & "G" respectively)**

4. That, later on an enquiry was conducted by the enquiry committee and submitted the enquiry report to the Respondent No.4 who in turn had placed the service of the appellant at the disposal of Respondent No.1 for further adjustment other than District Abbottabad vide letter No.245/EB-H dated 18.01.2016. **(Copies**

of enquiry report, Letter No. 245 dated 18.01.2016 are annexed as Annexure "H")

5. That, feeling dissatisfied the present appellant had preferred an appeal before the respondent No.1 by making a prayer for an enquiry afresh after affording opportunity of hearing to the appellant, which was accepted by Respondent No.1 and another enquiry was conducted by appointing Mr. Shahzad Principal G.H.S.S Shinkari as Enquiry Officer / Committee, who prepared his enquiry report after recording statement of appellant and submitted the same to the Respondent No.1 vide letter No. 2863 dated 04.09.2018 by forwarding some recommendations including the adjustment of appellant against any D.M post in District Mansehra. (Copy of Letter No. 2863 dated 04.09.2018 alongwith enquiry report is annexed as Annexure "I")

6. That, upon receipt of the said enquiry report the Respondents No.1, 2 have asked the Respondent No.5 to implement the

recommendations of enquiry Officer for adjustment of appellant against any D.M post at District Mansehra vide letter No. 1284/ F No.362 dated 17.09.2018 but the Respondent No.5 instead of adjusting the appellant as D.M at District Mansehra, vide letter No.5198/AB dated 14.03.2019 has once again requested the Respondent No.1 for guidance for the adjustment of appellant at District Mansehra or at District Abbottabad. (Copies of Letter No.1284 dated 17.09.2018 and Letter No.5198 dated 14.03.2019 are annexed as Annexure "J")

7. That, another enquiry with regard to the verification of service record of the appellant was conducted by D.D.E.O (Female) Kohistan / Respondent No.7 who has submitted his enquiry report to the Respondent No.1 through Respondent No.7 vide Letter No.5166 dated 13.09.2019. Moreover yet another enquiry proceeding for verification of service record of the appellant was conducted by V. Principal G.G.H.C School Abbottabad and submitted her

enquiry report to the Respondent No.3 vide Letter No.504 dated 08.06.2020. (Copies of Letter No.504 dated 08.06.2020 and Letter No.5166 dated 13.09.2019 alongwith enquiry report are annexed as Annexures "K" "L" & "M" respectively)

8. That, the respondent No.3 instead of conducting an another paneled enquiry for verification of service record of Appellant in the light of inquiry report of Vice Principal of G.G.H.C School Abbottabad vide impugned office letter endst No.5219-20 dated 10.08.2020 remarked in the following words *"so this office seems least interested in her adjustment at District Abbottabad, her order is thus becomes infructuous and may be considered as null and void"*. (Copy of letter No.5219-20 dated 10.08.2020 is annexed as Annexure "O")
9. That after receiving the letter No.5219-20 by the present appellant on 12.06.2021, has once again preferred a departmental appeal to the Competent Authority / respondent No.1 on

27.07.2021 but despite of lapse of 03 months, the fate of the appeal is still undecided and unresolved because it is not within the knowledge of the appellant whether the through proper channel appeal has been decided or not, and under this compelling scenario the appellant is being left with no other option but to knock the doors of this Worthy Tribunal for redressal of her genuine legal grievance by filing the instant appeal. (Copies of departmental appeal dated 27.07.2021 is annexed as Annexure "P")

10. That the present appellant feeling highly aggrieved by the impugned orders and acts of the respondents assail the same inter-alia on the following grounds:-

GROUNDS:-

- a. That the impugned office order No.5219-20 dated 10.08.2020 of respondent No.3 alongwith office order vide letter No.245/SB-11 dated 18.01.2016 of respondent No.5 and act of respondent No.1 for not deciding the departmental appeal No.79 dated

27.07.2021 of the appellant are against the law, facts, record available on the case file, based on presumptions, conjectures and surmises, the result of non-application of prudent mind and conscious, without affording proper opportunity of audience to the appellant not observing the recommendations of enquiry officer, against the policy and rules on the subject, misuse, abuse and excessive use of authority, ultra-vires, void ab-initio and hence liable to be set-aside.

- b. That it is worth perusal that although the service record of the appellant ranging from the date of appointment i.e 02.12.2009 till the impugned order dated 10.08.2020 has been verified according to the service book, by the enquiry officer vide letter No.5166 dated 13.09.2019 alongwith enquiry conducted by enquiry officer vide letter No.2863 dated 04.09.2018 and yet for further verification of service record / appointment order recommendations for paneled inquiry was proposed by enquiry officer vide letter No.504 dated 08.06.2020 but still the appellant has

neither been adjusted nor was allowed to assume charge at G.G.M.S Ali Abad inspite of the fact that the service of the appellant is still intact and not being suspended nor terminated.

- c. That most of enquiry proceedings conducted by the Enquiry Officers culminated with recommendations for adjustment of the appellant either at District Abbottabad or at District Mansehra because the appellant is the resident and domiciled of District Mansehra, but those enquiry reports with recommendations were not acted upon / implemented. Moreover the said enquiry reports are still in field as the same were not set-aside by the Competent Authority, hence, the appellant has an inalienable right to be adjusted as DM at any vacant post of G.G.M.S Mansehra by giving effect to the said enquiry reports.
- d. That it is also highlighted with regret that although the respondent No.3 has mentioned in her order vide letter No.5219-20 dated

10.08.2020 the fact that the appellant has fraudulently drawn a huge amount on record but intentionally and deliberately not considered this fact that the appellant has deposited an amount of Rs.1,00,000/- vide DDO Code No.7045 NBP Main branch Abbottabad vide receipt No.4392 dated 08.06.2015 and is still willing to deposit the remaining amount on her adjustment on one side and has reported the matter in dispute to the concerned DEO herself and also explained her position by submitting reply to the Show Cause Notice on the other side but, still after passage of sufficient time the appellant is waiting for her adjustment, however, the respondents generally and respondents No.1, 2, 3, 5 specially not taking keen interest in this regard rather have made the appellant as a rolling stone.

- e. That all the respondents being public officials and public servants are bound to performed their respective duties justly, fairly, honestly, impartially and in a transparent manner by considering as a sacred trust but it is

submitted with deep concern that the respondents specially respondents No.1 to 5 have exceeded their authority and wrongly assumed the powers even though not available under the Act as well the Rules which resulted into grave miscarriage of justice particularly in case in hand of the appellant by showing partisan as well as partial and malafide attitude and character.


- f. That the respondents have also miserably failed to act upon the novel principle of natural justice i.e. "*Audi alteram partem*" on one hand and not considering rather appreciating the statement as well as claim of the appellant on the other hand.
- g. That the service record of the appellant ranging from her appointment dated 02.12.2009 till the date of impugned letter dated 10.08.2020 is clean, neat and clear even verified and authenticated by Enquiry Officer (E.O) but inspite of this very harsh action was taken against the appellant by the respondents by not adjusting her without any

It is, therefore, humbly prayed that on acceptance of instant Service Appeal:

- 1) The impugned office order No.5219-20 dated 10.08.2020 of Respondent No.3 alongwith office order vide letter No.245/SB-11 dated 18.01.2016 of respondent No.5 and negligent act of respondent No.1 for not deciding the departmental appeal No.799 dated 27.07.2021 of the appellant are against the law, facts, record available on the case file, based on presumptions, conjectures and surmises, the result of non-application of prudent mind and conscious, without affording proper opportunity of audience to the appellant not observing the recommendations of enquiry officer, against the policy and rules on the subject, misuse, abuse and excessive use of authority, ultra-vires, void ab-initio and hence liable to be set-aside.
- 2) The respondent No.1 may please be directed to decide the departmental appeal No.799 of the appellant as soon as possible by issuing directions to the respondents No.3 and 5 for implementing the adjustment orders of the appellant.
- 3) Any other relief whichever is deemed appropriate favouring the rights of appellant.

Faiza
...APPELLANT

Through:


(SARDAR SHAHZAD AKBAR) *Sh*
Advocate High Court, Abbottabad

Dated:- 23/11 /2021

VERIFICATION:-

Verified that the contents of the instant Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal.

Dated:- 23/11 /2021

Faiza
...APPELLANT

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR CAMP AT ABBOTTABAD

Appeal No. /2021

Mst.Faiza Bibi D/o Musharaf Hussain R/o Bhair Kund, Tehsil and District Mansehra, (DM, G.G.M.S Ali Abad, Abbottabad)

...APPELLANT

V E R S U S

Director of Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar and others

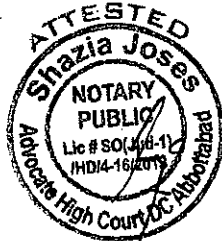
...RESPONDENTS

APPEAL

AFFIDAVIT

I, Mst.Faiza Bibi D/o Musharaf Hussain R/o Bhair Kund, Tehsil and District Mansehra, (DM, G.G.M.S Ali Abad, Abbottabad), *appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble tribunal.

Dated: 23/11 /2021



15/11/2021

D E P O N E N T

Faiza

Annex - A P → (16)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION KOHISTAN

APPOINTMENT

Consequent upon approval of Departmental Committee Kohistan and acceptance of appeals, the competent authority is pleased to appoint the following out District (Female) candidates in BPS-7 plus usual allowance as due and admissible under the rules in the schools noted against each on vacant posts with immediate effect in the interest of public service according to the merit policy issued by the Government of NWFP Elementary & Secondary Education Department, subject to the following conditions.

S#	Name of Candidates with Father Name	R/O	Name of School	Remarks
1	Robina sadaq D/O Mohammad Sadaq	Manshra	GGPS Chushang	Agst P. Post
2	Rubi Naz D/O Fazal Elahi	-do-	-do-	-do-
3	Faiza Bibi D/O Musharaf Hussain	-do-	GGPS Bansert	-do-
4	Saima Shereen D/O Shereen	-do-	-do-	-do-

CONDITIONS:

1. Charge report should be submitted to all concerned
2. No TA/DA is allowed to him.
3. Her appointments is purely on temporary basis and liable to termination at any time with out assigning any reason/ notice
4. She will be governed by such rules & regulation enforced and as prescribed by the Government from time to time, for the category of the Government servants to which she belong
5. In case the above candidate failed to assume the charge of his post with in 15-days, her appointment will automatically stand cancelled.
6. She should not be allowed to take over charge if his age is less than 18-years and above 35-years.
7. She should produced Age & Health Certificate from EDO Health Kohistan before taking over Charge.
8. Dy. District Officer (F) is directed to verify his certificates/ Documents from the concerned Board/ Institution before drawl of her pay.

[Signature]
Executive District officer
(E & S) Education Kohistan

Endst: No. 280-85/

Dated Kohistan the 2/12 /2009

Copy of the above is forwarded to the:-

1. PA to Director Schools & Literacy NWFP Peshawar
2. District Nazim Kohistan
3. District Coordination Officer Kohistan
4. District Accounts Officer Kohistan
5. Dy. District Officer (F) E&SE Kohistan Kohistan.
6. Candidate concerned.

[Signature]
Executive District officer
(E & S) Education Kohistan

CTC

SARDAR SHAHZAD AKBAR
ADVOCATE GENERAL
ABOTTABAD

[Signature]

Annex-B

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY
EDUCATION KHISTAN

P-17

2

CHANGE OF CADRE

Conceptual approval of Departmental Selection Committee of CGSE Department Kohistan and upon acceptance of appeal, the competent authority is pleased to change cadre of the following (Female) Teachers from DM to CT & PT to CT on BPS-9 plus usual allowance as due and admissible under the rules in the schools noted against each on vacant posts with immediate effect in the interest of public service according to the merit policy issued by the Government of NWFP Elementary & Secondary Education Department, subject to the following conditions:

S.//	Name of Candidates with Father Name	Change Cadre	Name of School where posted	Remarks
1	Fauza Bano B/D Muhammad Hussain	From PTC to DM BPS-9	GGMS Sayal Jashoi	Agst V Post
2	Ramzaan B/D Muhammad Zaman	From DM to CT BPS-9	GGMS Dubair	Agst NI Post
3	Lebra Iqbal B/D Muhammad Iqbal	-do-	-do-	-do-
4	Sumra Inam B/D M Inam	From PTC to AT BPS-9	-do-	-do-

CONDITIONS

1. Charge report should be submitted to all concerned
2. No TA/ DA is allowed to them
3. District Officer (I) is directed to verify their certificates/ Documents from the concerned Board/ Institution before deval of her pay.

[Signature]
Executive District officer
(E & S) Education Kohistan

Encl: No 628-33

Dated Kohistan the 2/12 /2009

Copy of the above is forwarded to the:-

1. PA to Director Schools & Literacy NWFP Peshawar
2. District Nazim Kohistan
3. District Coordination Officer Kohistan
4. District Accounts Officer Kohistan
5. District Officer (F) E&S Kohistan
6. Candidate concerned

[Signature]
Executive District officer
(E & S) Education Kohistan

CTC
SARDAR SHAHZAD AKBAR
ADVOCATE HIGH COURT
ABOTTABAD

[Signature]
[Signature]

P-2 (17-a)
BETTER COPY

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY
EDUCATION KOHISTAN**

CHANGE OF CADRE:

Consequent approval of departmental selection committee of E&SE department Kohistan and upon acceptance of appeal the competent authority is pleased to change cadre of the following (female) Teachers DM to CT & PET to CT and BPS-09 plus annual allowance as due and admissible under the rules to the schools noted against each on vacant post with immediate effect in the interest of public service according to the merit policy issued by the Government of NWFP Elementary & Secondary Education Department upper Kohistan in the following conditions:

S#	Name of Candidates with Father Name	Change Cadre	Name of School where posted	Remarks
1	Faiza Bibi D/O Musharaf Hussain	From PTC to DM BPS-9	GGMS Soyai Jashoi	Agst V. Post
2	Namzaad D/O Muhammad Zaman	From DM to CT BPS-9	GGMS Dubair	Agst ND Post
3	Lubna Iqbal D/O Muhammad Iqbal	-do-	-do-	-do-
4	Saima Imran D/O M. Imran	From PTC to AT BPS-9	-do-	-do-

CONDITIONS:

1. Charge report should be submitted to all concerned
2. No TA/DA is allowed to them
3. District Officer (F) is directed to verify their certificates / Documents from the concerned Board/ Institution before drawl of her pay.

Sd/-
Executive District Officer
(E & S) Education Kohistan

Endst: No. 628-33

dated Kohistan the 2/12/2009

Copy of the above is forwarded to the:-

1. PA to Director Schools & Literacy NWFP Peshawar.
2. District Nazim Kohistan
3. District Coordination Officer Kohistan
4. District Accounts Officer Kohistan
5. District Officer (F) E&SE Kohistan
6. Candidate Concerned

Sd/-
Executive District Officer
(E & S) Education Kohistan

CFC
[Signature]
SARDAR SHAHZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

Office order

Office of the Executive District Officer
Elementary & Secondary Education Kohistan

The following female teachers are hereby adjusted/ transferred on their own pay grade with immediate effect in the interest of public service.

S.No	Name of teacher with school	Name of School where adjusted	Remarks
1	Farzana CT GGMS Pattan	GGMS Maidan Kolai	Agst V Post
2	Nazina Shaheen CT GGMS Maidan Kolai	GGMS Pattan	-do-
3	Tabbasum Shaheen CT GGMS Maidan Kolai	GGMS Maidan Kolai	-do-
4	Mehar-un-Nissa DM GGMS Jalkot	GGMS Shikhanabad	Agst N.C Post
5	Faiza Bibi DM GGMS Dadbotm	GGMS Dashti Colony	Agst V Post
6	Lubna Iqbal CT GGMS Shikhanabad	GGMS Shikhanabad	Agst N.C Post
7	Namzaad CT GGMS Shikhanabad	-do-	-do-
8	Faiza Bibi DM GGMS Sural Jalkot	GGMS Jalkot	V.S No.4
9	Shazia Bano DM GGMS Maidan Kolai	GGMS Maidan Kolai	Agst V Post
10	Saima Imran AT GGMS Jalkot	GGMS Shikhanabad	Agst N.C Post
11	Neelofar Shaheen CT GGMS Pattan	GGMS Pattan	Agst V Post

Note:

1. No TA/DA is allowed to any one.
2. Charge report should be submitted to all concerned.

Executive District Officer
E&SE Kohistan

Dated Kohistan the 22/11/2010

Endst. No. 8418-22/1

Copy of the above is forwarded to the

1. PS to Secretary E&SE KPK Peshawar
2. PA to Director E&SE KPK Peshawar
3. District Coordination Officer Kohistan
4. District Accounts Officer Kohistan
5. District Officer (F) E&SE Kohistan

CTC

SARDAR SUZAN DARBAN
ADVOCATE HIGH COURT
ABBOTTABADExecutive District Officer
E&SE Kohistan

BETTER COPY

P → (18-a)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION KOHISTAN**

OFFICE ORDER:

The following Female teachers are hereby adjusted/transferred on their own pay & grade with immediate effect in the interest of public service.

S.No	Name of teacher with school	Name of School where adjusted	Remarks
1	Farzana CT GGMS Pattan	GGMS Maidan Kolai	Agst V.Post
2	Nazina Shaheen CT GGMS Maidan Kolai	GGMS Pattan	-do-
3	Tabbasum Shaheen CT GGMS Maidan Kolai	GGMS Maidan Kolai	-do-
4	Mehar-un Nissa DM GGMS Jalkot	GGMS Shilkanabad	Agst N.C Post
5	Faiza Bibi DM GGMS Dadboon	GGMS Dassu Colony	Agst V.Post
6	Lubna Iqbal CT GGMS Shilkanabad	GGMS Shilkanabad	Agst N.C Post
7	Namzaad CT GGMS Shilkanabad	-do-	-do-
8	Faiza Bibi DM GGMS Soyai Jashoin	GGMS Jalkot	V.S S.No.4
9	Shazia Bano DM GGMS Maidan Kolai	GGMS Maidan Kolai	Agst V.Post
10	Saima Imran AT GGMS Jalkot	GGMS Shilkanabad	Agst N.C Post
11	Neelofar Shaheen CT GGMS Pattan	GGMS Pattan	Agst: V.Post

NOTE:-

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

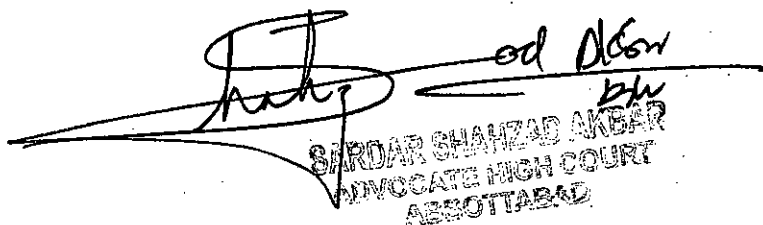
**Executive District Officer
E&SE Kohistan
Dated Kohistan the 22.11.2010**

Endst: NO. 8418-22/

Copy of the above is forwarded to the:-

1. PS to Secondary E&SE KPK Peshawar
2. PA to Director E&ES KPK Peshawar
3. District Coordination Officer Kohistan
4. District Account Officer Kohistan
5. District Officer (F) E&ES Kohistan

**Executive District Officer
E&ES Kohistan**

CTC

SARDAR SHANZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

Annex - D

P ⇒ (19)

DEPARTMENT OF ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA, PESHAWAR.

OFFICE ORDER

Mrs. Faiza Bibi DM GGMS, Soyal Jashowi District Kohistan is hereby transferred against the vacant post of DM at GGMS Ali Abad District Abbottabad on her own pay & DPS in the interest of public service with effect from the date of her taking over charge.

- Note:-
1. Charge report should be submitted to all concerned.
 2. No TA/DA etc are allowed.
 3. The EDO concerned is directed to check her original service documents before making payment of salary.
 4. Her Seniority will be determined as per rules/policy.

DIRECTOR
ELEMENTARY & SECY. EDUCATION
KHYBER PAKHTUNKHWA

Endst. No. 2238-42 /F.No167/G. Transfer of (F) Teachers/2012 Dated Peshr the 27/7/2012

Copy of the above is to the:-

1. Executive District Officer (E&SE) Kohistan & Abbottabad.
2. District Accounts Officers Kohistan & Abbottabad
3. Teacher concerned.
4. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.

SARDAR SHAHID AKBAR
ADVOCATE IN COURT
ABBOTTABAD

[Signature]
Deputy Directress (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar
27/7/12

Minz oor

verified
[Signature]
Deputy Directress (Estab)
Elementary & Secy. Education
Khyber Pakhtunkhwa Peshawar.

BETTER COPY

P ⇒ (19-a)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

OFFICE ORDER.

Mst. Faiza Bibi DM GGMS; Soyab Jashowi District Kohistan is hereby transferred/adjusted against the vacant post of DM at GGMS Ali Abad District Abbottabad on her own pay & BPS in the interest of public service with effect from the date of her taking over charge.

NOTE:-

1. Charge report should be submitted to all concerned.
2. No TA/DA etc are allowed.
3. The EDO concerned is directed to check her original service documents before making payment of salary.
4. Her Seniority will be determined as per rules/policy.

DIRECTOR
ELEMENTARY & SECY: EDUCATION
KHYBER PAKHTUNKHWA

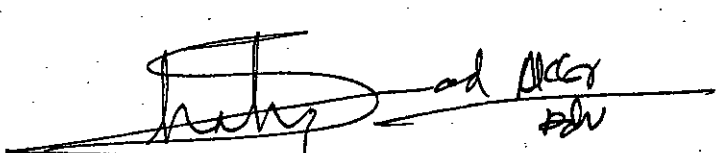
Endst: No 2238-42/F.No 167/G. Transfer of (F) Teachers/2021 Dated Peshr the 27.7.2012

Copy of the above is to the:-

1. Executive District Officer (E&SE) Kohistan & Abbottabad.
2. District Account Officer Kohistan & Abbottabad.
3. Teacher concerned.
4. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
5. M/File.

Deputy Directress (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

CFC


SARDAR SHAHZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

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

Name: Mst. Faiza Bibi

Race: Swati

Residence: Makala Bairkund Tehsil K District
Mansohra

Father's name and residence: Mushraf Hussain
As above

Date of birth by Christian era as nearly as can be ascertained: (02-02-1986)

Date Exact height by measurement: 5-3

Personal marks for identification: ovil

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

Little Finger:

Ring Finger:

Middle Finger:

Fore Finger:

Thumb:

Attested
Signature
Executive District Officer
District, Swat
Khyber Pakhtunkhwa

Signature of Government Servant: Faiza Bibi

Signature and designation of the Head of the Office, or other Attesting Officer: [Signature]
By: D.O (F)
[Signature]

~~SAKIB SHAIKH AKBAR~~
~~ADJUTANT ATTORNEY GENERAL~~
~~ADJUTANT ATTORNEY GENERAL~~
~~ADJUTANT ATTORNEY GENERAL~~
AKSAR
100

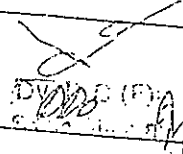
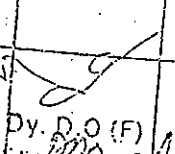
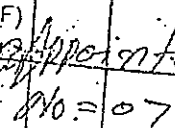
9 Signature and Designation of the head of the office or other attesting officer in attestation of column 1 to 6	10 Date of termination or appointment	11 Reason of termination (such as Promotion, transfer, dismissal, etc)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting " officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
				Nature and Jura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitble to another Government			
					Period			Government to which debitble
				Approp. 9 Plus used	Period 01.12.2010 to 31.3.2011	Govt of Sindh All allowances E.C. Attracted		
				Change of Cadre known				
				PST 2 DM Post in BOS				
				9 Plus unused allowances				
				Under the rule vide E.D.O				
				Enstit: ND 02-12-2009				
				628-3301.				
						District Officer Female DPO (E & S) Education Kohistan		


*Executive District Officer
Sindh
Education*

R-8: P-59
 Servo-11 verified for 4/2011
 due to change of cadre
 w.p/ 1-12-2010 to 31-3-2011
 vide S.no 30 dt. 22-4-11
 II: 6256/2
 21/4/2011

CTC

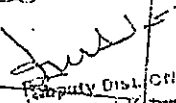
od ALLER
 RN

8 Signature of Government Servant	9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 6	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	15 reference to records, purchase certificate, or or praise of Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months inc. which leave salary is debutable to another Government		
						Period		
		30/11/2010	Transfer					
					Appointed as Pst In EPS No. 07 at EPS Banarsi vide EPO (EPS) Kohistan Endest. No. 280-85 dt 2-12-09			
					18.20			
					TEA Di-			
	Verified Soras I for MO 6/2010				Drman Pay v Allow: due to Appointment of Est bill vide T.No. 640 dt 10 th 12/2009 to 31/5/2010			
					4255/11/2009			
					21/12/09			
					4255/11/2009			
					4255/11/2009			
					4255/11/2009			
					4255/11/2009			
					4255/11/2009			
					4255/11/2009			
					4255/11/2009			

SARDAR... COURT ABBOTABAD

 2010
 cye

Executive District Officer
 District & Secretary
 Abbotabad

Service verified vide
 3-12-2009 to 30-11-10
 from application
 after retrieval return
 of this office


 Deputy Dist. Officer
 E.S. Kohistan

P => (23)

1	2	3	4	5	6	7	8
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. 374 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
Pst 99/B	BPS	D10 = 107 (BPS)	3530/-	190/-	9230/-		
Ban Seri		BPS	3530/-			3/12/09	Fazila Biter
C.G.M.S. Sajal Fashonari D.M		BPS No. 9 Ks	3820/-	230/-	10720/-	01/01/2011	

Executive District Officer
Secondary & Secondary Education
Khyber Pakhtunkhwa

SARWAR AHMED
ADVOCATE HIGH COURT
ABBOTABAD

etc

P → (24)

(For use in Police Department only)

Name

1.

2.

3.

(24)

T.S.

Name

Ra

Re

Verification Roll No.

dated

received back

Fat

Date

Left Thumb Impression

Passed SSC Exam: Grom BISE ATD
under the R. NO. 56020 MARKS
874 131/250 Session 2003 (A)

Qualification

Date

Qualification

Date

Ex

English

Passed FA Exam: Grom
under the R. NO. 41372
686/1100. Session 2005 (A)

Passed ATD
MARKS abt.

Pushto

B.L. of B.A. Sec. 122

Per

Urdu

Passed P.T. Examination Grom
Departmental Exam: S&L Department
under the R. No. 246
Marks - 707/1200 R.D.

Pleadership examination

Lev
of

Plan-drawing

28/12/2005
Training School Final examination

Litt

Finger Print

C.C.

Other qualifications

Mid

Drill Instructing

SRDAR KHANZAR
ABOTTABAD
ABBOTTABAD

Thu

Court Duties

Accepted

Sig

Reserve Duties

Executive District Officer
Secretary, Government of Punjab
Karachi

Sig
Her
Off

N.B. — Line to be drawn under the qualification possessed.

Particulars	Prev Per No	Design	Rate	Amount	Code	Account No	Period
1000 House Rent Allowance	1000	3109	144.00	144.00	CPA	0000000000	01.07.2011 - 31.07.2011
1210 Convey Allowance 20	1210	3501	150.00	150.00	CPA	0000000000	01.07.2011 - 31.07.2011
1300 Medical Allowance	1300	3511	1000.00	1000.00	CPA	0000000000	01.07.2011 - 31.07.2011
1520 UAA-KOHISTAN 402(1)-1	1520	3604	500.00	500.00	CPA	0000000000	01.07.2011 - 31.07.2011
1945 Educ Allowance 2010	1945	3640	710.00	710.00	CPA	0000000000	01.07.2011 - 31.07.2011
1920 Educ Relief Allow-2	1920		573.00	573.00	CPA	0000000000	01.07.2011 - 31.07.2011
PAYMENTS				7737.00			
Travel Code							

DEDUCTIONS
 Payment through CGR 144.00
NET PAY 21,007.00 01.07.2011 31.07.2011
 Acct. No:

Particulars	Prev Per No	Design	Rate	Amount	Code	Account No	Period
1000 House Rent Allowance	1000	3109	144.00	144.00	CPA	0000000000	01.07.2011 - 31.07.2011
1210 Convey Allowance 20	1210	3501	150.00	150.00	CPA	0000000000	01.07.2011 - 31.07.2011
1300 Medical Allowance	1300	3511	1000.00	1000.00	CPA	0000000000	01.07.2011 - 31.07.2011
1520 UAA-KOHISTAN 402(1)-1	1520	3604	500.00	500.00	CPA	0000000000	01.07.2011 - 31.07.2011
1945 Educ Allowance 2010	1945	3640	705.00	705.00	CPA	0000000000	01.07.2011 - 31.07.2011
1920 Educ Relief Allow-2	1920		807.00	807.00	CPA	0000000000	01.07.2011 - 31.07.2011
PAYMENTS				11,008.00			
Travel Code							

DEDUCTIONS
 Payment through CGR 704.00
NET PAY 13,304.00 01.07.2011 31.07.2011
 Acct. No:

Particulars	Prev Per No	Design	Rate	Amount	Code	Account No	Period
1000 House Rent Allowance	1000	3109	144.00	144.00	CPA	0000000000	01.07.2011 - 31.07.2011
1210 Convey Allowance 20	1210	3501	150.00	150.00	CPA	0000000000	01.07.2011 - 31.07.2011
1300 Medical Allowance	1300	3511	1000.00	1000.00	CPA	0000000000	01.07.2011 - 31.07.2011
1520 UAA-KOHISTAN 402(1)-1	1520	3604	500.00	500.00	CPA	0000000000	01.07.2011 - 31.07.2011
1945 Educ Allowance 2010	1945	3640	510.00	510.00	CPA	0000000000	01.07.2011 - 31.07.2011
1920 Educ Relief Allow-2	1920		573.00	573.00	CPA	0000000000	01.07.2011 - 31.07.2011
PAYMENTS				13,479.00			
Travel Code							

DEDUCTIONS
 Payment through CGR 793.00
NET PAY 12,686.00 01.07.2011 31.07.2011
 Acct. No:

Particulars	Prev Per No	Design	Rate	Amount	Code	Account No	Period
1000 House Rent Allowance	1000	3109	144.00	144.00	CPA	0000000000	01.07.2011 - 31.07.2011
1210 Convey Allowance 20	1210	3501	150.00	150.00	CPA	0000000000	01.07.2011 - 31.07.2011
1300 Medical Allowance	1300	3511	1000.00	1000.00	CPA	0000000000	01.07.2011 - 31.07.2011
1520 UAA-KOHISTAN 402(1)-1	1520	3604	500.00	500.00	CPA	0000000000	01.07.2011 - 31.07.2011
1945 Educ Allowance 2010	1945	3640	710.00	710.00	CPA	0000000000	01.07.2011 - 31.07.2011
1920 Educ Relief Allow-2	1920		573.00	573.00	CPA	0000000000	01.07.2011 - 31.07.2011
PAYMENTS				13,479.00			
Travel Code							

DEDUCTIONS
 Payment through CGR 793.00
NET PAY 12,686.00 01.07.2011 31.07.2011
 Acct. No:

P => 25

Executive District Officer
 Secondary Education
 Kohistan

SAJID AHMED
 ADVOCATE
 COURT

etc

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

SHOW CAUSE NOTICE

I, Mr. Zia-ud-Din District Education Officer (Male) Abbottabad & in charge District Education Officer (Female) Abbottabad as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve Show Cause upon you Mst. Faiza Musharaf, DM GGMS Ali Abad Abbottabad as follows:

As per Enquiry Report received from Mst. Farhat Bashir Principal, GGHS No.2 Abbottabad and Mr. Abdur Rashid, Vice Principal, GHSS Nawanshahr Abbottabad Vide No. & dated 07-02-2015.

- a. You were transferred from District Kohistan & Posted at GGMS Ali Abad Abbottabad through Inter District Transfer Order by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No.2238-42/ File No.167/G dated 27-07-2012.
- b. You just after taking over charge on 02-08-2012 remained yourself will fully absent from duty and also been drawing salary w.e. from 01-09-2012 to 31-12-2014 without performing duty amounting to Rs.4,99,147/- (Rs.117487/-through manual bill and Rs.381660/-through bank account).

In exercise of the power conferred by the Khyber Pakhtunkhwa, Govt: Servant (Efficiency & Discipline) Rules 2011, the Competent Authority is hereby serve you with the instant show cause notice with the directions to submit reply within 15 days of the receipt of this notice as to why the penalties as defined in Rule 4 (a) & (b) ibid should not be imposed upon you and also intimate whether you desire to be heard in person.

In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-parte decision will be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

Mst. Faiza Musharaf, DM
Govt: Girls Middle School,
Ali Abad, Abbottabad,

CFC

[Handwritten Signature]
COMPETENT AUTHORITY

[Handwritten Signature]
ADVOCATE GENERAL
COURT
ABBOTTABAD

BETTER COPY

P ⇒ 26-a

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
ABBOTTABAD.

SHOW CAUSE NOTICE

I Mr. Zia-ud-Din, District Education Officer (Male) Abbottabad & In charge District Education Officer (Female) Abbottabad as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve Show Cause upon you Mst. Faiza Musharaf, DM GGMS Ali Abad Abbottabad as follows:

As per Enquiry Report received from Mst. Farhat Bashir Principal, GGHS No.2 Abbottabad and Mr. Abdur Rashid, Vice Principal, GHSS Nawanshehr Abbottabad Vide No. & dated 07-02-2015.

- a. You were transferred from District Kohistan & Posted at GGMS Ali Abad Abbottabad through Inter District Transfer Order by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No.2238-42/ File No.167/G dated 27-07-2012.
- b. You just after taking over charge on 02-08-2012 remained yourself will fully absent from duty and also been drawing salary w.e. from 01-09-2012 to 31-12-2014 without performing duty amounting to Rs.4,99,147/- (Rs.117487/- through manual bill and Rs.381660/- through bank account).

In exercise of the power conferred by the Khyber Pakhtunkhwa, Govt: Servant (Efficiency & Discipline) Rules 2011, the Competent Authority is hereby serve you with the instant show cause notice with the direction to submit reply within 15 days of the receipt of this notice as to why the penalties as defined in Rule 4 (a) & (b) ibid. should not be imposed upon you and also intimate whether you desire to be heard in person.

In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-parte decision will be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

COMPETENT AUTHORITY

Mst. Faiza Musharaf, DM
Govt: Girls Middle School,
Ali Abad, Abbottabad,

CTC
SARFARAZ AHMED AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD
dear

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

No. 7833 / F-1/Show Cause Notice.

Dated: 28/4/2015

0992-9310102

District Education Officer Aid@gmail.com



(27)
2

To:

The Head Mistress,
Govt. Girls Middle School,
Ali Abad, Abbottabad.

C/O Musharaf Hussain R/o Mohallah
Bani Khand Tehsil & District Mansehra.

Subject:

SHOW CAUSE NOTICE.

Memo:

Show Cause in respect of Mst. Faiza Musharaf DM of your school is attached herewith. You are hereby directed to serve the same to her and return one copy to this office as a token of receipt.

CTC

SARDAR SHAHZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

DISTRICT EDUCATION OFFICER (F)
ABBOTTABAD.

7

District Education Officer (F)
Abbottabad

Annex-9

P=)

28

Subject: REPLY TO SHOW CAUSE NOTICE AND NO. 7033/EB-1/SHOW
CAUSE NOTICE DATED 23-04-2014

Dear Madam/Sir

Most respectfully it is stated that parawise comments are as under:-

- a) Correct I was transferred from District Kohistan and posted at GGMS Ali abad through Inter District transfer order.

I was not willful absent from duty. I was always willing to perform duty, my father in law was admitted in hospital being heart patient and I was also pregnant (Maternity issue, child birth 28-08-2012) both certificate are attached.

It is also brought in your kind notice that I was not reported as absent by any authority from the office of DEO(F), but I myself visited the DEO (F) office in December, 2014 and reported my whole case to DEO(F), if I was culprit, I should have kept the authority in dark, but I approached the office and told the authorities about my problems and related complications.

It is requested that keeping in view my personal initiative in this case, I may be provided justice and adjusted anywhere in Abbottabad against vacant post. I was sincere and told the department real situation.

- b) In connection with drawl of pay for disputed period, it is stated that I myself brought the case into notice of authority, therefore I am ready to refund the amount into Government treasury in the shape of advance and installment any time.

Dear Madam/Sir

It is requested that keeping in view my sincerity because I did not keep the department in dark and my willingness to deposit amount for disputed period into government treasury and being poor financial position of my family, I may be exonerated from charges and adjusted at any vacant post in Abbottabad. I am also ready to appear in person if you direct me.

I hope that being female and only earning hand and I will be provided justice.

CTC
SARFARAZ AKBAR
ADVOCATE IN COURT
ABBOTTABAD

Yours Obediently,

Faiza
Faiza Musharat, DM
Govt Girls Middle School
Ali abad, Abbottabad

BETTER COPY

P ⇒ (28-a)

District Education Officer (F)
Abbottabad.

Subject: REPLY OF SHOW CAUSE NOTICE VIDE NO.7033/EB-I/SHOW CAUSE NOTICE DATED 28-04-2015.

Dear Madam/Sir.

Most respectfully it is stated that parawise comments are as under:-

- a) Correct I was transferred from District Kohistan and posted at GGMD Ali Abad through inter District transfer order.

I was not willful absent from duty. I was always willing to perform duty, my father in law was admitted in hospital being heart patient and I was also pregnant (Maternity issue, child birth 28-08-2012) both certificate are attached.

It is also brought in your kind notice that I was not reported as absent by any authority from the office of DEO (F), but I myself visited the DEO (F) office in December, 2014 and reported my whole case to DEO (F), if I was culprit, I should have kept the authority in dark, but I approached the office and told the authorities about my problems and related complication.

It is requested that keeping in view my personal initiative in this case, I may be provided justice and adjusted anywhere in Abbottabad against vacant post. I was sincere and told the department real situation.

- b) In connection with drawl of pay for disputed period, it is stated that I myself brought the case into notice of authority, there for I am ready to refund the amount into Government treasury in shape of advance and installment any time.

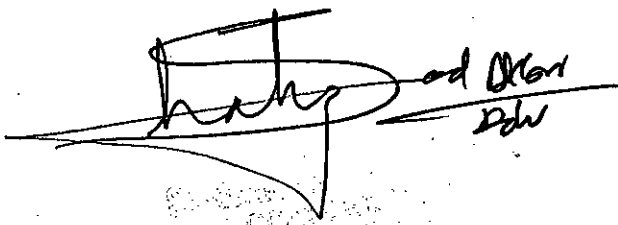
Dear Madam / Sir.

It requested that keeping in view my sincerity because I did not keep the department in dark and my willingness to deposit amount for disputed period into government treasury and being poor financial position of my family, I may be exonerated from charges and adjust any vacant post in Abbottabad. I am also ready to appear in person if you direct me.

I hope that being female and only earning hand and I will be provided justice.

Yours Obediently,

Sd/-
Fiza Musharraf, DM
Govt, Girls Middle School.
Aliabad Abbottabad.

CTC

ad D/O
D/O

Enquiry Report

Subject of Enquiry:	Mst Faiza Musharraf was transferred to GGMS Ali Abad from Distt. Kohistan, through inter district transfer but failed to join her duty with in stipulated time.
Enquiry Committee:	Mst Farhat Bashir Principal GGHS No.2 Atd and Mr. Abdur Rashid V/P GHSS Nawan Shehr vide notification issued under Endst No. 05-8 dated 01-01-2015 by DEO(F) Atd.
TOR's	<ul style="list-style-type: none"> ➤ Willful absence from duty / not resumption of charge of the post properly. ➤ Drawal of pay from Govt. treasury for not being at the strength of DEO(F) Abbottabad.
Procedure: <i>From case notion accused to Mst Faiza Musharraf</i>	For the purpose, probing into the TORs, the enquiry committee served the questionnaire to:- <ol style="list-style-type: none"> 1. I/C GGMS Ali Abad, Mst. Saeeda Bibi. 2. Dy DEO(F) the DDO also, Miss Abida Shaheen. 3. The accused teacher Mst Faiza Musharraf DM and also pursued the record as under: 4. Service Book of the accused. 5. First appointment order, change of Cadre order, and transfer (Inter Distt) order. 6. Cash Book, Pay print for the month of April, May, June 2013, Arear drawn from 01-09-2012 to 31-3-2013. Following documents were demanded from the Office of DEO(F) but could not be provided:- <ol style="list-style-type: none"> 1. NOC accorded to the accused and availability of post. 2. Copy of pay print wef. 07/2013 to 09/2013. 3. Statement of count r/o accused. 4. Copies of change form(Source), 5. Total amount Paid/drawn from Govt. Treasury in term of the pay of the accused wef 01-09-2012 to 31-12-2014.
Brief History: <i>CTC</i>	Mst Faiza Musharraf is permanent resident of Distt. Mansehra Tehsil Balakot as per domicile. But in her service book her permanent address has been found recorded as Bairkund Mansehra and she is close relative of Ex. EDO Kohistan Mr. Mukhtiar Khan Swati. She was appointed as PST without having certificate of PTC in Distt. Kohistan in 2009. Her Cadre was changed from PST to DM(BPS-9 to 12). Both the orders were passed by Mukhtiar Khan as EDO Kohistan. On 27-07-2012 with the help of the same officer she was posted at GGMS Ali Abad through inter district transfer by Director E&SE Peshawar. The record of NOC for availability of post is not available in the office of DEO(F) Abbottabad. She bitterly failed to comply with the order and did not resume her charge at GGMS Ali Abad Abbottabad. For the first time she appeared on scene in the month of Jan 2013 when she approached to I/C school at home during winter vocation for resumption of charge but I/C School refused to hand over charge for being too late and brought the matter into the notice of DEO(F) Office. In this way her transfer order became infructuous automatically. Office sources revealed that Mr. Mukhtiar Khan has been visiting DEO(F) office and found sitting with Ex-Dealing Clerk M. Shafique. A bogus charge report was prepared, perhaps in the

SAFIA AKBAR
ADVOCATE
COURT
ABBOTTABAD

month of April 2013 and sent it to DAO for activation of her pay. But DAO raised objection on change of Cadre. DDO Abida Shaheen recorded a certificate in the S/Book of the teacher regarding the change of Cadre from PST to DM under her signature. After compulsory retirement of Mr. Shafique D/A and shifting of DDO ship to DEO(F) Samina Iltaf, the matter was disclosed.

Fact/Findings:

The situation was analyzed, the record, questionnaires and service record of the teacher were minutely perused. The enquiry reached to the following facts:

1. Basically, her appointment as PST and later on change of Cadre are doubtful and illegal.
2. Her transfer from Distt. Kohistan to Distt. Abbottabad is malafide for the reason that she was appointed in Distt. Kohistan through low merit /illegal means to serve in said Distt. whereas for appointment in Distt Abbottabad needs very high merit and tough competition, Secondly she belonged to Distt. Mansehra not Distt. Abbottabad and thirdly the record of NOC for availability of post is not available in DEO(F) and no body is ready to shoulder the responsibility thereof. She is liability for Distt: Abbottabad.
3. She did not resumed her charge with in stipulated time and her transfer order had become infructuous when she made effort for charge with delay of about 6 months. It is further added that she was relieved from Distt: Kohistan on 29-08-2012 wef 31-08-2012 but she tried to get the charge of the post in Distt: Abbottabad wef 02-08-2012 i-e retrospective date as mentioned on the body of so called charge report. It is clear cut forgery case.
4. Drawal of her pay wef. 01-09-2012 and upgradation from BPS-09 to 15 is illegal and responsibility thereof rests on the shoulder of dealing hand and concerned DDO as valid record of handling over charge is not available in paper and in her service book.
5. It is astonishing to observe that her pay was activated on 15-04-2013 as her record of sevice book, by DAO but drawn manually in the months of April, May and June 2013 and embezzled as it was neither paid to concerned nor recorded in Cash Book.
6. Arrear of the pay of the teacher was drawn wef. 01-09-2012 to 31-03-2013 (07) month Rs. 117487/= but neither paid to the teacher nor recorded in Cash Book and bungled by the dealing hands.
7. Rs. 42354/= found recorded in S/Book with receipt by the teacher concerned but she totally denies the receipt, it is fake entry which was not to be made in S/Book otherwise the amount has been embezzled.
8. Record of pay wef 01-07-2013 to 31-10-2013 is not available anywhere in the office of DEO(F). It is assumed that pay of these three months have also been drawn and embezzled.
9. In the month of Sep 2013, Dy DEO Mst Abida Shaheen was transferred to Distt. Haripur. It is noteworthy that just after one month of her transfer the pay of the teacher was drawn through pay print and sent to her bank account.
10. The teacher confessed that she, for the first time received her

CTC

~~SALDAR SAHIB AMBIA~~
~~ADVOCATE HIGH COURT~~
~~ABBOTTABAD~~

pay wef 01-11-2013 to 12/2014. She was ignorant of the amount drawn as her salary wef 01-09-2012 to 31-10-2013. It means that her pay was drawn through illegal means wef 01-09-2012 to 31-10-2013 that was not paid to her and embezzled by Dealing hands and DDO herself.

11. The teacher as well as DDO are ready to refund the salary drawn from Govt. treasury without handing/taking over charge to the teacher in Distt Abbottabad (Questionnaire).
12. All this happened due to the incompetence of the DDO Mst. Abida Shaheen who is occupying very responsible position but not ready to shoulder the responsibility, thereof. She has failed to provide cogent reasons about the charge of the teachers and drawl of her illegally and unlawfully and shifting the responsibility to the dealing hands and the teachers concerned.
13. The DDO is of the opinion that the teacher has unlawfully drawn the pay, she forgets that no individual employee can draw her pay by herself. It is DDO who draws/disburse the salary observing the coddle formalities. She, as DDO, bitterly failed to do her job demanded by her position. She shares equal responsibility with dealing hands. Furthermore, her reply of questionnaire is not satisfactory and relevant to the questions asked. (Copy annexed)

Recommendations:

1. The teacher has not taken over charge in Distt. Abbottabad. Her transfer order has become infructuous, she may not be considered on the strength of DEO(F) Abbottabad, and be sent back to Distt Kohistan for disciplinary proceeding.
2. The salary of the teacher drawn wef 01-09-2012 to 31-10-2013 be recovered from dealing hand Mr. M. Shafique and DDO Mst Abida Shaheen to the Govt treasury.
3. Salary drawn wef 01-11-2013 to 31-12-2014 be recovered from the teacher concerned to the Govt. treasury.
4. Manually drawn pay and arrears during the DDO ship of Mst Abida Shaheen and M. Shafique as dealing clerk should be investigated and reconciled from the recipients to make sure the payment to the concerned.
5. Mr. Shafique, the dealing clerk should be dismissed from service without any benefit rather to make him proceed on compulsory retirement. His case should be referred to anticorruption department for legal proceedings.
6. It is not a single case of corruption and embezzlement, there is chain of corrupt practices being carried on making the DEO(F) office, a bargain centre, the matter should be brought into the notice of Director E&SE and Secretary E&SE KPK for necessary measures/steps while posting/transferring the officers against such a important positions.
7. The appointments made in Distt: Kohistan are mostly through bargaining/out of merit and without having proper educational qualifications, should be restricted to the Distt: concerned. All the teachers appointed at PST/CT/DM/TT/Qari/AT etc, the Distt: Cadres, appointed in Distt: Kohistan. And posted/transferred to Distt: Abbottabad should be sent back to their respective Distt, on the strength of which they got their appointments. They are liabilities for Distt: Abbottabad and should be disposed off. The

CTC

[Signature]
 SADEEN CHAUDHARY
 JUDGE
 ADJUTANT HIGH COURT
 ABBOTTABAD

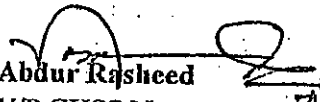
P => (32)


opportunity should given to candidates highly qualified, -
waiting for appointment from Distt: Abbottabad against the
vacant post on merit in the best interest of generation to
come. As it is common business to get employment in Distt:
Kohistan and later on seek transfer to the other Districts
vacating the in Distt: Kohistan for further business. This is
illegal practice and should be stopped.

49

No. _____ Date. _____

Report submitted to DEO(F) E&SE Abbottabad.



Abdur Rashheed
V/P GHSS Nawanshehr 7/2/2015
Abbottabad.


Principal
G.G.H. School
No. 2 Abbottabad
Farhat Bashi
Principal
GGHS No.2
Abbottabad.

Enclosed:

1. Service Book original.
2. Attendance register original
for GGMS Ali Abad.
3. Questionnaire from:
 1. DY DEO (P)
 2. Saeeda Bibi / GGMS Ali Abad
 3. Faiza Bibi the accused teacher.

CTC


SARDAR SAEED AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 245 / EB-II

Dated: 18 / 01/2016

0992-342533, 0992-342314

deofemale_abbottabad@yahoo.com

To:

The Director
E&SE Khyber Pakhtunkhwa.
Peshawar.

SUBJECT: DISS MISSEL OF Mst. FAIZA MUSHARAF PST/DM GGMS SOYAL JASWAI KOHISTAN UNDER TRANSFER TO GGMS ALI ABAD, ABBOTTABAD.

Memo:

Please read with:-

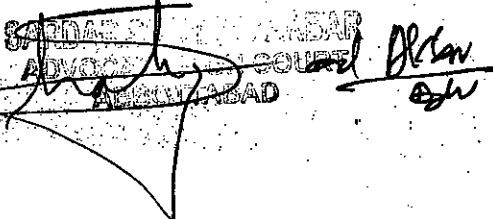
- i. Enquiry Report Conducted by enquiry Committee attached as Annexure-----A
- ii. Copy of service book of Mst. Faiza Musharaf.....Annexure-----B
- iii. Transfer order Endst: No. 2238-42 issued on 27-07-2012
Signed by/verified by Deputy Director (Estb) Khyber Pakhtunkhwa
Peshawar..... Annexure-----C

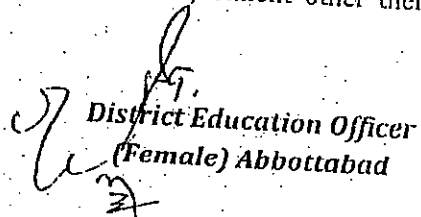
It is submitted that:-

1. Mst. Faiza Musharaf resident of Bhairkund District Mansehra she relative of Mukhtiar Khan Ex-E.D.O Kohistan.
2. She was appointed as PST (Untrained) at GGPS Bansari District Kohistan On 03/12/2009.
3. Her cadre was changed from PST to DM (BPS-7 to 09) both the order were Passed by Mukhtiar Khan Ex-E.D.O Kohistan, as appeared page-07 of service book.
4. She was transferred to GGMS Ali Abad on 07-07-2012 by Dy: Director (Estb) E&SE Peshawar.
5. She did not resume her charge at GGMS Ali Abad up till now but has Succeeded to draw Salary Rs.4, 99,147/- (Four Lac Ninety Nine thousand & one hundred & forty seven) with mal practice and involvement of Mst. Abida Shaheen, Ex-DDO (F) Abbottabad and Clerk Mr. Muhammad Shafiq, Ex-Accountant who has already been compulsory retired, detail can be read in findings of Enquiry report attached as Annexure-----A. above
6. She is willing to refund the drawn amount if her services are restored
Annexure-----D
7. Mst. Faiza Musharaf, DM has never performed duty in District Abbottabad and is absent after transfer from District Kohistan.
8. This office is not in position to take any decision about her future as she has not properly taken over charge at District Abbottabad.
9. She has refunded Rs. One lac through chalian No. 1222 DATED 08/06/2015 and she is also willing to refund remaining drawn amount.

On the basis of above facts, the case is submitted before your good self with the remarks that case be settled at your office or D.E.O (F) Kohistan as she cannot be given charge at GGMS Ali Abad District Abbottabad after elapse of more than 03 years.

Keeping in view the position explained above the services of above accused teachers are placed at your good self disposal for further adjustment other than District Abbottabad.

etc

District Education Officer
(Female) Abbottabad


District Education Officer
(Female) Abbottabad

Annex - I P → (34)

OFFICE OF THE PRINCIPAL GHS SHINKIARI MANSEHRA
email: ghsshinkiar@gmail.com Phone: 6997-531111 Mob: 03009119058

No. 2863
Date 4/9/2018

(11)

To:
The Director (E&SE)
Khyber Pakhtunkhwa Peshawar

Subject:- Enquiry report in respect of Mrs Faiza Musharaf DM
Memo: under transfer from GGMS Soyal Jashoi to GGMS Aliabad

It is submitted that in the light of notification issued under Endstt No-1907-9 dated 10-04-2018. Wherein I have been appointed as inquiry officer on the appeal of Mrs. Faiza Musharaf DM under transfer from GGMS Soyal Jashoi District Kohistan to GGMS Aliabad District Abbottabad. In accordance with the said notification I have conducted the detail enquiry of the case and report thereof is enclosed herewith for further n/a please.

etc
~~SARDAR SHAHZAD AKBAR
ADDITIONAL DISTRICT COURT
ABBOTTABAD~~ *Alam*
BSW

[Signature]
MUHAMMAD SHAHZAD
Principal
GHS Shinkari Mansehra
(Enquiry officer)

ENQUIRY REPORT

LOCATION OF ENQUIRY	The Director (E&SE) Khyber Pakhtunkhwa Peshawar
ENQUIRY COMMITTEE	Muhammad Shaiqad Principal GHS Shunkari District Manshera
PLACE OF INQUIRY	Office of the District Education Officer (Female) Abbottabad
DATE OF INQUIRY	22-04-2018 onward

BRIEF HISTORY OF THE CASE

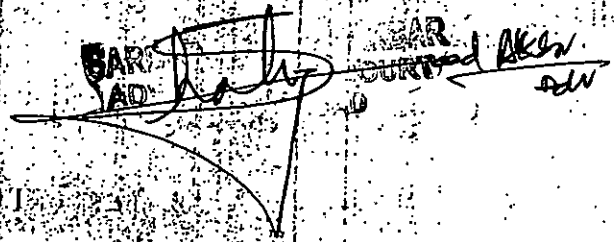
Mrs. Faiza Musharaf DM has been transferred from GGMS Soyai Jasawi District Kohistan to GGMS Aliabad District Abbottabad vide Director (E&SE) Khyber Pakhtunkhwa office order No 2238-42 dated 27-07-2012. She reported her arrival at GGMS Aliabad on 02-08-2012 and reported to have not been handed over the charge by the incharge of the school as reported by the DEO (Female) Abbottabad her pay has been drawn from the treasury for the period from 01-09-2012 to 31-12-2014.

REFERENCES/TORS

- To probe and inquire the facts with reference to DEO (Female) Totghar letter No No:4176-78 dated 02-03-2018 regarding dismissal of accused teacher.
- To probe the facts of the case about not handing over charge and draw of salary without performing the duty by the teacher concerned.

PROCEDURE

- Questionnaires were served to the DEO (F) Abbottabad and teacher concerned.
- Scrutiny of the records.
- Personal hearing.



OFFICE OF DEO (F) ABBOTTABAD

P → (36)

- The accused teacher transferred from District Kohistan to GGMS Aliabad District Abbottabad but she never went to her school.
- The pay of said teacher was drawn from government treasury at that time through manual bills by the then accountant of this office whose name is Mr. Shafique
- The pay of the said teacher was drawn for the period from 01-09-2012 to 31-12-2014.
- In order to hide the facts and figures from the higher authorities and also illegally drawl of salary of accused teacher Mrs. Abida shaheen Ex-DDO (F) was punished by imposing major penalty i.e compulsory retirement from the service.

STATEMENT OF FAIZA MUSHARAF THE TEACHER CONCERNED.

- She said that the transfer order and charge report submitted to DEO (F) Abbottabad and then applied for the maternity leave after the medical fitness when I reported to take charge I was not given the charge on the basis of late reporting the duty, while I have submitted my arrival report well in time and then submitted leave application which certificate for maternity leave.
- I have requested many times to the higher authorities for my adjustment but no action has been taken so far.
- It is evident by the submission of transfer order, Charge reports, LPC and service book in the DEO (F) office Abbottabad my pay was drawn.
- After expiry of leave I again reported my arrival at DEO (F) Abbottabad as well as GGMS Aliabad, but I have not been handed over charge due to reason for late submission of arrival report.
- She has submitted an appeal to the Director (E&SE) Education Khyber Pakhtunkhwa for adjustment, but till now I have not been adjusted.
- According to the reply of teacher she has received and amount of Rs-381660/ through bank account.
- Out of the above amount Rs. 100000/ has been deposited in the treasury vide chalan No. 4392 dated 08-06-2015 NBP Main Branch Abbottabad. He also willing to deposit the remaining amount after adjustment through monthly salary.

CTC

SARDAR CHANAN ANWAR
ADDITIONAL JUDGE
ABBOTTABAD
D. Khan
12/11

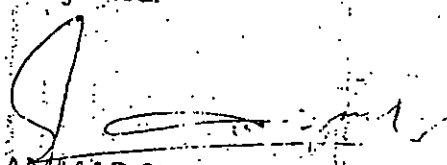
DETAILS OF FACTS FINDING

- P-37
- I have not found any notification regarding dismissal of the accused teacher in the record provided by DIO (F) Abbottabad as reported in the letter No.4176-78 dated 02-03-2018 by DEO (F) Torghar
 - The teacher concerned was transferred from District Kohistan on 02-08-2012
 - It is observed that she did not take over charge as DM at GGMS Aliabad.
 - It is found that she did not submitted her arrival report or charge report of GGMS Aliabad to DEO (F) office Abbottabad.
 - The salary has been drawn illegally without performing the duties.
 - The teacher herself admitted the facts and refunded an amount of Rs.100000 vide chalan No 4392 dated 08-06-2015 A/C No 2814 NBP main Brach Abbottabad.
 - The teacher is still surplus and has not been adjusted
 - An amount of Rs.399147/- is still required to be recovered.
 - From the record it is observed that she presented herself for recovery of pay and she appealed for adjustment.
 - In the earlier Inquiry made By DEO (F) Abbottabad No 245 dated 18-01-2016. She recommended for further adjustment other than district Abbottabad.

RECOMMENDATION

Keeping in view the above facts it is suggested and recommended that

- The remaining amount received by the teacher must be recovered from the teacher which has been paid by the DEO (F) Abbottabad without performing the duties.
- As already recommended by the DEO(F) Abbottabad vide order NO,245 dated 18-01-2016 the teacher concern may be adjusted against any DM post in district Mansehra as she domiciled this District, however an affidavit may be obtained from the teacher concern regarding recovery of remaining amount before her adjustment.
- The intervening period may be treated as leave without pay as she has not performed duties and remained unadjusted.



MUHAMMAD SHAHZAD
Principal
GHS Shinkhari Mansehra
(Inquiry officer)

Email: shahzad_sir@gmail.com
Phone: 0997-577154
Cell: 999719058

c/c

~~SARDAR SHAHZAD ALIBAN~~
SARDAR SHAHZAD ALIBAN
COURT
ABBOTTABAD

Annex - J

P →

38

TO BE SUBSTITUTED WITH SAME NO. & DATE

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Pesh:

No. 1284 /F.No. 362/(F)/Appeal Abbottabad

Dated Peshawar the 17/9/2018

The District Education Officer,
(Female) Mailselira

Subject -

ENQUIRY REPORT IN RESPECT OF MST. FAIZA MUSHARAF DM UNDER
TRANSFER FROM GGMS SOUAL JASHOI KOHISTAN TO GGMS ALIABAD
ABBOTTABAD.

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiry report carried out by Muhammad Shahzad Principal GHS Shinkiani Mailselira in respect of Mst. Faiza Musharaf DM GGMS Ali Abad Abbottabad and to ask you to implement the recommendations of enquiry officer for adjustment against any DM post.

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,

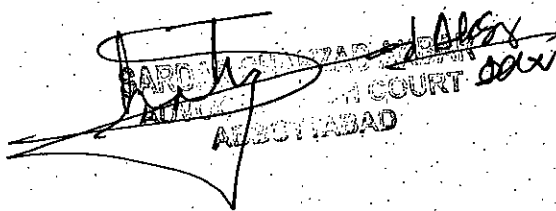
Enlist No

Copy forwarded your information to the:-

P.A to Director (E&SE) Khyber Pakhtunkhwa local Directorate.

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,

CTL



BETTER COPY

P⇒

38-a

**Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Pesh:**

**No 1284/F.No,362/(F)Appeal Abbottabad
Dated Peshawar the 17/09/2018**

To,

The District Education officer,
(Female) Mansehra

SUBJECT:-

**INQUIRY REPORT IN RESPECT OF MST.FAIZA MUSHARAF DM
UNDER TRANSFER FROM GGMS SOUAL JASHOI KOHISTAN TO
GGMS ALIABAD ABBOTTABAD.**

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiry report carried out by Muhammad Shahzad Principal GHS Shinkiari Mansehra in respect of Mst. Faiza Musharaf DM GGMS Ali Abad Abbottabad and to ask you to implement the recommendations of enquiry officer for adjustment against any DM post.

**Deputy Director Female
(E&SE) Khyber Pakhtunkhwa**

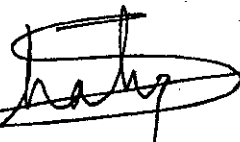
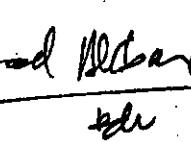
Endst: No. _____

Copy forwarded your information to the:-

1. PA to Director (E&SE) Khyber Pakhtunkhwa local Directorate.

**Deputy Director Female
(E&SE) Khyber Pakhtunkhwa**

C.T.C

**SARWAR SHAMZAD ANWAR
ADVOCATE NON COURT
ABBOTTABAD**

P → 39

DISTRICT EDUCATION OFFICER (F)
MANSEHRA

P → 39

The Director
Elementary and Secondary Education
(Khyber Pakhtunkhwa Peshawar)

362/1/2018

Subject:-

INQUIRY REPORT IN RESPECT OF MST. FAIZA MUSHARAF DM UNDER
TRANSFER FROM GGMS SOUAL JASHOI KOHISTAN TO GGMS ALLI ABAD
ABBOTTABAD

Memo,

Reference to the subject cited above in connection with your letter No. 1284/F.No.362 (F)/Appeal Abbottabad dated 17/09/2018, it is brought in to your kind notice that Mst. Faiza Musharaf D.M GGMS Ali Abad (Abbottabad) was initially appointed in District Kohistan and later on transferred to District Abbottabad against D.M post. It is submitted that she was neither appointed nor transferred to District Mansehra. However, the inquiry officer recommended her adjustment at District Mansehra. Your good self is requested to guide this office whether to adjust the teacher concerned at District Mansehra after obtaining comments from District Education Officer (Female) Abbottabad or your office may direct DEO (F) Abbottabad to adjust her there because the case falls in the ambit of DEO (F) Abbottabad.

18/11/18

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

CTC

[Signature]
SARFARAZ KHAN
ADVOCATE GENERAL COURT
ABBOTTABAD

Annex 'K' 3

P-40

104

OFFICE OF THE PRINCIPAL GOVT GIRLS COMP HIGHER SECY SCHOOL ABBOTTABAD.

No. 504

Dated 08/06/2020

10

The District Education Officer (F)
Abbottabad.

Subject: INQUIRY REGARDING VERIFICATION OF SERVICE RECORD/
APPOINTMENT IN R/O MST. FAIZA MUSHARAF, DM.

Memo:

With reference to your Notification issued vide Endst: No. 1581 dated 05-03-2020 on the subject cited above.

The following facts are being submitted.

1. Mst Faiza Musharaf D/O Musharaf Hussaini was appointed on 02-12-2009 in BPS-07 at GGPS Banseri vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: No.280-85 dated 02-12-2009.
2. Her cadre was changed to PTC BPS-07 to DM BPS-09 vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: No. 628-33 dated 02-12-2010 and adjusted at GGMS Jashoi.
3. She was transferred to District Abbottabad vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar order issued under Endst: No.2238-42 dated 27-07-2012.

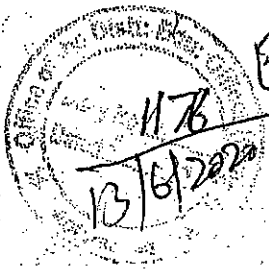
Different enquiries were conducted by the following officers.

1. Miss Farhat Bashir, Principal B-19 GGHS No.2 Abbottabad & Mr.Abdur Rashid, V.principal GHSS Nawanshehr ATD.
2. Mr.Riaz Swati, District Education Officer (F) TorGhar.
3. Mr.Shehzad, Principal GHS Shenkri District mansehra.

SERVICE RECORD / APPOINTMENT ORDER.

Now it is being directed to conduct enquiry regarding verification of Service record/ Appointment order in r/o Mst Faiza Musharaf.

It is submitted that a paneled enquiry should be conducted under the supervision of the most senior hierarchy as no record was found in this regard to verify.



EB-II
1176
13/6/2020
For
Shamshad
12/06/2020

IChaudhary
V.Principal
Govt Girls Comp
Higher secy: School ATD
Vice Principal
Govt. Girls Comp: Higher
Secy: School Atd

SARDAR AKBAR
COURT
ABBOTTABAD
Alkon
M

Annex - L

P ⇒

(41)

OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN

No. 5166 DFO (F) KH Dated: 13/9/2019

To,

The Director Elementary
& Secondary Education KP
Peshawar.

Subject: INQUIRY REPORT IN R/O MST. FAIZA MUSHRAF DMI.

Memo.

Reference your letter No. 6806 /F.No.362/F/Appeal/Vol-I/Abbottabad
dated Peshawar the 24/05/2019 on the subject cited above.

Mr. Abdur Rehman DDEO (F) Kohistan nominated as inquiry officer
on 11/06/2019 regarding on the subject cited above. The inquiry officer submitted
his finding and facts.

All relevant record along with comments of inquiry officer is hereby
attached and forwarded for further necessary action please.

District Education Officer
(Female) Kohistan

Endst. No. 5167-68 DEO (F) KH Dated: 13/9/2019.

Copy of the above is forwarded to the:-

01. Deputy District Education Officer (F) Kohistan.
02. Office File.

District Education Officer
(Female) Kohistan

CTC
SARIAB KHAN
ADVOCATE
ABBOTTABAD
COURT

Better Copy

P ⇒ (41-a)

OFFICER OF THE DISTRICT EDUCATION OFFICER (FEMALE)
KOHISTAN

No.5166 DEO (F) KH/Dated: 13.09.2019

To,

The Director,
Elementary & Secondary Education KP,
Peshawar.

SUBJECT: INQUIRY REPORT IN R/O MST. FAIZA MUSHARAF DM.

Memo,

Reference your letter No.6806/F.No.362/F/appeal/Vol-1/Abbottabad dated Peshawar the 24.05.2019 on the subject cited above.

Mr. Abdur Rehman DDEO (F) Kohistan nominated as inquiry officer on 11.06.2019 regarding on the subject cited above. The inquiry officer submitted his finding and facts.

All relevant record along with comments of inquiry officer is hereby attached and forwarded for further necessary action please.

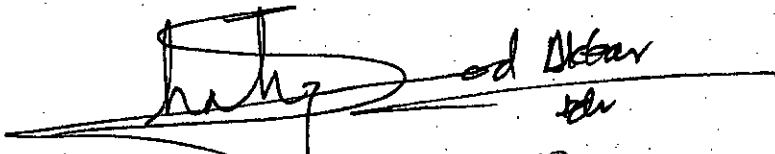
**District Education Officer
(Female) Kohistan**

Endstt. No.5167-68 DEO (F) KH Dated: 13.09.2019.

Copy of the above is forwarded to the:-

1. Deputy District Education Officer (F) Kohistan.
2. Office File.

**District Education Officer
(Female) Kohistan**

CTC

**SARDAR SHAHZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD**

Annex - M'

P => (49)

OFFICE OF THE DEPUTY DISTRICT EDUCATION OFFICER (FEMALE)
KOHISTAN

To: The District Education Officer,
(Female) Kohistan

Subject: INQUIRY IN R/O MIST. FAIZA MUSTARAF DM.

Memo,

Reference letter No.68061 No.36 I appeal Vol I Abbottabad dated
24.05.2019 issued from Director Elementary & Secondary Education Peshawar

In this regard I was directed to check the record and report.

I visited DFO (M) Office Kohistan because all record of FDO office is
lying there, no any record was found there about the said teacher due to abolishment
of FDO post the record was not shifted to DFO (F) office and now not available.

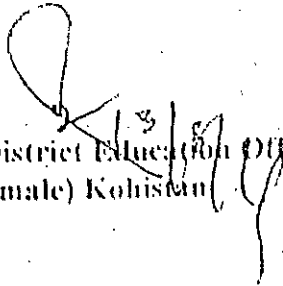
I approached DFO (F) office Abbottabad and teacher concerned and got
the following record from them:

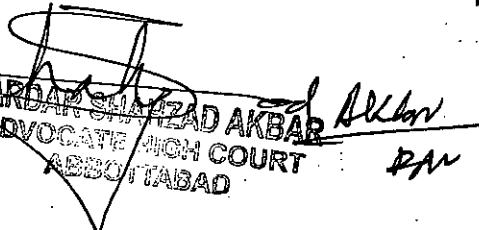
- a. Office Order regarding change of cadre.
- b. Relieving Chit.
- c. Appointment order of PTC.
- d. LPC.

According to this available record,

01. She was appointed as PST teacher vide FDO Office No.280-85 dated
02/12/2009.
02. She was ordered to DM post vide change of cadre letter No.28-33 dated
02/12/2010.
03. She got pay up to 31/08/2012 according to LPC receiving by FDO office and
countersigned by DAO KH.
04. She was transferred to GGMS Ali Abad Abbottabad vide Directorate order
No. 2238-12 dated. 27/07/2012.
05. All documents have been verified by the then FDO concerned on telephonic
message

Hence the report is submitted for further necessary action please.


Deputy District Education Officer
(Female) Kohistan


SARDAR SHAFIQ AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

Better Copy

P ⇒

(42-a)

OFFICER OF THE DEPUTY DISTRICT EDUCATION OFFICER (FEMALE)
KOHISTAN

To,

The District Education Officer,
(Female) Kohistan.

SUBJECT: INQUIRY IN R/O MST. FAIZA MUSHARAF DM.

Memo,

Reference letter No.6806/F, No.362/F/appeal/Vol-1/Abbottabad dated 24.05.2019 issued from Director Elementary & Secondary Education Peshawar.

In this regard I was directed to check the record and report.

I visited DEO (M) Officer Kohistan because all record of DEO office is lying there, no any record was found there about the said teacher due to abolishment of DEO post the record was not shifted to DEO (F) Officers and now not available.

I approached DEO (F) office Abbottabad and teacher concerned and got the following record from them:

- a. Officer Order regarding change of cadre:
- b. Relieving Chit.
- c. Appointment order of PTC.
- d. LPC.

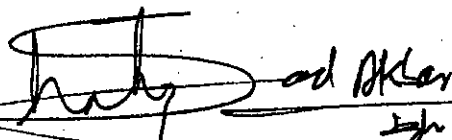
According to this available record.

1. She was appointed as PST teacher vide EDO Office No.280-85 dated 02.12.2009.
2. She was ordered to DM post vide change of cadre letter No.28-33 dated 02.12.2010.
3. She got pay up to 31.08.2012 according to LPC receiving by EDO office and countersigned by DAO KH.
4. She was transferred to GGMS Ali Abad Abbottabad vide Directorate order No.2238-42 dated 27.07.2012.
5. All documents have been verified by the then EDO concerned on telephonic message.

Hence the report is submitted for further necessary action please.

Deputy District Education Officer
(Female) Kohistan

C.T.C



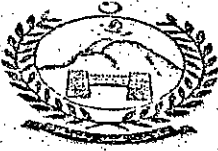
SIRDAR GHANI ULLAH
ADVOCATE HIGH COURT
ABBOTTABAD

Annex - 'O'

P →

43

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



0992-342533, 0992-342314
Deofemale_abbottabad@gmail.com

Notification:

WHEREAS, Mst: Faiza Mushraf D/O Musharaf Hussain was appointed on 02-12-2009 in BPS-07 at GGPS Banseri vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: No. 280-85 dated 02-12-2009, later on her cadre was changed from PTC BPS-07 to DM vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: NO. 628-33 dated 02-12-2010 and adjusted at GGMS Jashoi.

WHEREAS, she was transferred to District Abbottabad vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar order issued under Endst: No. 2238-42 dated 27-07-2012, but unfortunately failed to take charge at GGMS Ali Abad/ or resumed duty there.

WHEREAS, the said Teacher has drawn a huge amount Rs: 499147/- for the period of 01-09-2012 to 30-11-2014, without performing duty against her post, she confessed that in her previous statements (copy attached) and also during personal hearing in the office of undersigned under no. 4291 dated 06-07-2020,

WHEREAS, amount of Rs: 100000/- deposited vide DDO code 7045, CO 2814 R/O/P NBP main branch Atd Receipt no.4392 dated 08-06-2015, while an amount of Rs: 399147/- still pending on her part that need to be deposited immediately.

WHEREAS, inquiry conducted by Mr. Abdul Rasheed V-Principal GHSS Nawansher and Ms. Farhat Bashir GGHS No. 2 Abbottabad. Vide No.05-8 dated 01-01-2015, given below allegation against the said teachers head been proved.

- Willful absence from duty/not resumption of charge of the post properly.
- Drawl of pay from Govt: Treasury for not being at the strength of DEO (F) Abbottabad.

Therefore, her case for dismissed from service was sent to Director E&SE KPK vide No.245/EB-II dated 18-01-2016.

WHEREAS, another inquiry was conducted vide No. 1907-9/F.No.362/(F)/appeal Abbottabad dated 10-04-2018, by Mr. Muhammad Shahzad Principal GHS Shinkhari Mansehra, inquiry officer submitted inquiry report with the recommendation that the Teacher concerned may be adjusted against any DM post in District Mansehra as she has domicile of District Mansehra, remaining amount Rs: 399147/- must be recovered from said teacher which has been paid her without performing the duties.

WHEREAS, she filed her appeal to director E&SE. In response to her appeal she were called for personal hearing along with undersigned and DEO (F) Dassu (Upper) Kohistan vide No. 1289/F.NO. 362/F/Abbottabad Dated: 17-10-2019, at Directorate of E&SE KPK Peshawar.

WHEREAS, the appellate Authority the Director E&SE placed Mst. Faiza Musharaf back at the Disposal of DEO (F) Abbottabad with the following further direction vide No. 5122-25/F.No. 362 dated; 12-12-2019.

- a. The authenticity as to the genuineness of the service record, her appointment as PST and then change of cadre to DM may be verified and determined from the DEO (F) Dassu (Upper) Kohistan through a formal inquiry and process accordingly.
- b. If proved bogus she may be reported to law-enforcing agencies and all the salaries drawn fraudulently be recovered from her.

Contd: P2

C.T.C.
SARFAT KHAN
ADVOCATE GENERAL
COURT

and D.Khan

edhi

P ⇒ (44)

- c. If proved genuine then she may be proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules 2011, for non-reporting/non-performance of duty while regularly and fraudulently drawing salaries from 01-09-2012 to 30-11-2014.

WHEREAS, District Education officer (F) Kohistan submitted report vide No. 6486/DEO (F) KH-4 dated: 08-02-2020, that no record be traced in r/o said teacher, and office is unable to verify the service/cadre change record of Mst. Faiza Musharaf from PST to DM.

WHEREAS, Mst. Khoula Javed V. Principal GGCHSS Abbottabad was nominated as inquiry officer vide this office No. 1581 dated 05-03-2020, she submitted her inquiry report with the recommendation that on inquiry regarding verification of service record/ appointment order in r/o Mst. Faiza Musharaf should be conducted as no record was found in this record to verify. WHEREAS, Mst. Faiza Musharaf was also called No. 4153/EB-II dated 30-06-2020, but she failed to satisfy the undersigned.

WHEREAS, After going through her case thoroughly and considering the fact, that Mst. Faiza Mushraf has never been on strength of District Abbottabad and fraudulently drawn a huge amount on accord of salary, thus lost her credibility, so this office seems least interested in her adjustment at District Abbottabad, her order is thus infructuous and maybe considered as null and void.

[Signature]
District Education Officer
(Female) Abbottabad

Endst No: 5219-20 dated: 10/08/2020

Copy of the above is forwarded to:

1. PS to Secretary, Elementary & Secondary Education KPK Peshawar.
2. PS to Director, Elementary & Secondary Education KPK Peshawar vide reference letter No. 5122-25/F.No. 362 dated; 12-12-2019.
3. Deputy Commissioner Abbottabad.
4. District Account Officer Abbottabad.
5. District Education Officer (F) Dasso (Upper) Kohistan.
6. Official Concerned.
7. Office file.

[Signature]
District Education Officer
(Female) Abbottabad

Received by
Ehsan Khan
3/10/21
12/6/21

10/8/2020

[Signature]
ADVOCATE GENERAL
ABOTTABAD

نفاذ کے لئے ایجنسی کے سربراہ کی ذمہ داری ہے اور اس میں ڈائریکٹریٹ اور اس کے ذمہ داروں کی شمولیت ضروری ہے۔
 9 جنوری 2018ء کو ڈائریکٹریٹ نے فیورٹ سٹریم ڈیمو کو منظور کیا جس کے تحت ڈی ایم کو منظور کیا گیا۔
 9 جنوری 2018ء کو ڈائریکٹریٹ نے فیورٹ سٹریم ڈیمو کو منظور کیا جس کے تحت ڈی ایم کو منظور کیا گیا۔
 17 مئی 2018ء کو ڈائریکٹریٹ نے فیورٹ سٹریم ڈیمو کو منظور کیا جس کے تحت ڈی ایم کو منظور کیا گیا۔
 18 مئی 2018ء کو ڈائریکٹریٹ نے فیورٹ سٹریم ڈیمو کو منظور کیا جس کے تحت ڈی ایم کو منظور کیا گیا۔
 22 مئی 2018ء کو ڈائریکٹریٹ نے فیورٹ سٹریم ڈیمو کو منظور کیا جس کے تحت ڈی ایم کو منظور کیا گیا۔
 23 مئی 2018ء کو ڈائریکٹریٹ نے فیورٹ سٹریم ڈیمو کو منظور کیا جس کے تحت ڈی ایم کو منظور کیا گیا۔

یہ امور درج ذیل کے تحت حل کیے جائیں گے۔
 1. ڈی ایم کو منظور کیا گیا۔
 2. ڈی ایم کو منظور کیا گیا۔
 3. ڈی ایم کو منظور کیا گیا۔
 4. ڈی ایم کو منظور کیا گیا۔
 5. ڈی ایم کو منظور کیا گیا۔

الحاجن
 خانزادہ شرف
 DM
 اے جی ایم
 علی آباد ایمپ اینڈ ایڈمنسٹریشن
 فیورٹ سٹریم ڈیمو

SARDAR SAJJAD AKBAR
 ADEQUATE COURT
 HEAD

P→

46-a

BETTER COPY

بخدمت جناب ڈائریکٹر صاحب ایلمنٹری اینڈ سیکنڈری ایجوکیشن صوبہ خیبر پختونخواہ پشاور

مضمون: اپیل برائے بحالی ملازمت

جناب والا!

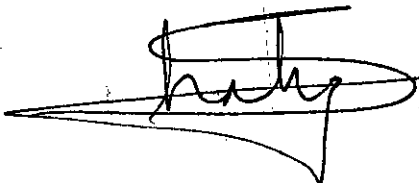
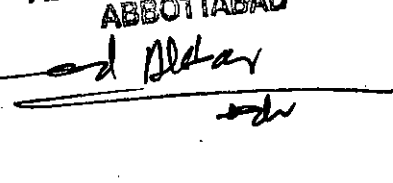
نہایت منودبانہ گزارش ہے کہ سائلہ بطور PST ٹیچر بمطابق آرڈر نمبر 85-280 مورخہ 09-12-2009 ضلع کوہستان میں بھرتی ہوئی سائلہ کو بعد ازاں DM ٹرینڈ ہونے کی وجہ سے چیئنج آف کیڈر کے آرڈر نمبر 33-628 مورخہ 09-12-2002 کے ذریعے GGMS سویال جھوٹی کوہستان میں DM پوسٹ پر تعینات کیا گیا سائلہ اس دوران باقاعدگی سے ڈیوٹی کر رہی تھی اور تنخواہ وصول کرتی رہی بمطابق آرڈر نمبر 42-2238 مورخہ 12-7-27 کو آنجناب کے حکم کے مطابق GGMS علی آباد ضلع ایبٹ آباد میں ٹرانسفر کیا گیا سائلہ چارج رپورٹ LPC اور سروس بک وغیرہ جملہ کاغذات وغیرہ DEO زنانہ ایبٹ آباد میں جمع کیا اور سکول گئی بد قسمتی سے میٹرنٹی کی رخصت کی وجہ سے تین ماہ بعد سکول گئی مگر انچارج ہیڈ مسٹریس نے چارج دینے سے انکار کر دیا اس کے بعد DEO آفس کے چکر لگاتی رہی کہ کسی دوسرے سکول میں ایڈجسٹ کر دیں مگر کوئی شنوائی نہ ہوئی تاہم تنخواہ جاری کر دی گئی درخواست برائے پوسٹنگ کے جواب میں میری انکوائری شروع ہو گئی اور 15-4-28 کو شو کاز نوٹس جاری کر دیا گیا جس کا جواب میں نے دے دیا اور حقائق سنائے DEO(F) ایبٹ آباد میں کیس بمطابق نمبر 245 مورخہ 16-1-18 ڈائریکٹر صاحب آنجناب کو مزید کارروائی کیلئے بھیج دیا اور آخری پیرا گراف میں کسی دوسرے ضلع میں تعیناتی کی سفارش کی۔

جناب عالی!

میری اپیل اور DEO(F) ایبٹ آباد کے مذکورہ لیٹر پر ڈائریکٹر صاحب نے بمطابق نوٹیفکیشن نمبر 198 مورخہ 18-4-10 کو ایک ہائی لیول کی انکوائری کی اور گریڈ 18 کے پرنسپل GHS شنکیاری مانسہرہ محمد شہزاد صاحب انکوائری آفیسر مقرر کیا گیا پرنسپل شہزاد صاحب نے تفصیلی انکوائری کی اور سائلہ کو انکوائری رپورٹ نمبر 863 مورخہ 18-9-4 کو ضلع مانسہرہ DM پوسٹ پر ایڈجسٹمنٹ کیلئے سفارش کی اور موصول شدہ تنخواہ جس میں سے ایک لاکھ روپے بقایا رقم ریکور کرنے کی سفارش کی اس انکوائری کے نتیجے میں جناب ڈائریکٹر صاحب نے DEO(F) مانسہرہ میں تعینات کیا جائے بمطابق نمبر 1289 مورخہ 17-9-2018 کہ فائزہ مشرف DM کو مانسہرہ میں تعینات کیا جائے DEO(F) مانسہرہ نے تعمیل حکم کی بجائے کیس دوبارہ ڈائریکٹر صاحب کو

C.T.C

SARDAR SHANZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

P ⇒ (46-b)

بھیج دیا بحوالہ 5198 مورخہ 14-1-2019 نا انصافی اور حکم عدولی ہے اس آرڈر کو Implement کرنا چاہیے تھا مگر D.E.O(F) مانسہرہ نے نہیں کیا حالانکہ کلیئر کٹ آرڈر تھا بمطابق 25-12-2019 مورخہ 12-12-2019 کیس دوبارہ D.M.O(F) ایبٹ آباد کے پاس آ گیا D.E.O(F) کوہستان سے سروس ریکارڈ طلب کیا جو بمطابق نمبر 5166 مورخہ 13-9-2019 کو مہیا کیا گیا اور D.M.O(F) کوہستان نے سروس ریکارڈ کی تفصیل پیش کی اور ٹرانسفر ٹو ایبٹ آباد ضلع تک کا احوال لکھا انکواریوں کا لامتناہی سلسلہ چل نکلا اور مجھے بھی پرسنل ہیئرنگ کیلئے بلایا اور میں نے صحیح صورتحال بیان کی۔ اب مورخہ 10-08-2020 کو ایک اور نوٹیفیکیشن نمبر 20-5219 مورخہ 10-08-2020 کو جاری کیا مفہوم سمجھنے سے سائلہ قاصر ہے اور آرڈر مذکورہ مجھے نہیں دیا گیا بعد میں 12-6-2021 کو دفتر سے فوٹو کاپی حاصل کی اور آپ سے اپیل ہے کہ ازراہ کرم سائلہ کو ضلع مانسہرہ DM پوسٹ پر ایڈجسٹ کیا جائے سائلہ نے وصول شدہ تنخواہ سے ایک لاکھ روپے جمع کرادیئے ہیں باقی ایڈجسٹمنٹ پر جمع کرواؤں گی غلطی کی معافی دی جائے اور میرے چھوٹے چھوٹے بچے سکولوں میں زیر تعلیم ہیں اور مالی حالات سخت خراب ہیں۔

گزارش ہے کہ شہزاد صاحب پرنسپل GHS BPS-19 شنکیاری کی انکواری کی سفارشات پر عمل درآمد کرتے ہوئے آنجناب نے ضلع مانسہرہ میں ایڈجسٹمنٹ آرڈر کر دیا تھا اس آرڈر کو Implement کیا جائے۔

آپ کی عین نوازش ہوگی۔

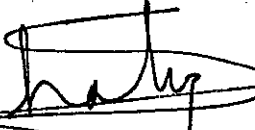

سائلہ آپ کیلئے آپ کے بچوں کیلئے دعا گو رہے گی۔

العارض

فائزہ مشرف DM

GGMS علی آباد ایبٹ آباد

CTC

SARDAR SHANZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

1543

Department of Examinations Schools & Literacy Department, NWFP

P => (47)



NWFP
DETAILED MARKS CERTIFICATE
Training Classes Examination (Drawing Master)

Name Fauza Bibi

Session 2006

Father's Name Musharaf Hussain

Roll No. 246

Subject	Maximum Marks	Marks obtained		
		Internal	External	In words
1. Scale, Technical and Geometrical Drawing: Free hand Sketching	1100			55
2. Model Drawing	150			23
3. Nature Study	150			36
4. Black-Board Sketching	150			36
5. Craft	1700			133
6. Islamiyat	100			54
7. History (Art)	100			76
8. Experimental Drawing	50			37
9. Physical Education	50			39
10. Design	50			26
11. Teaching practice	200			192
Total	12200			707

Note: Errors/commissions excepted.

Patrol Passed Division _____ Division 2

Prepared by _____

Checked by Department _____

Date of Declaration of Result 10 DEC 2006

Deputy Director (Examination),
Schools & Literacy Department,
N.W.F.P., Peshawar.

CFC

SARDAR SHAHID AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

P-48

REGIONAL INSTITUTE OF TEACHERS EDUCATION
GHAZIKOT, MANSEHRA

Roll No. 24

8



PROVISIONAL CHARACTER
CERTIFICATE

Session 2005 - 2006

This is to certify that Miss FAIZA BIBI
Daughter of MUSARRAF HUSAIN who has been a
regular student of JDPE / D.M / Diploma in Education class has passed the
Departmental Examination of the Board of Feshwar held on 17-06-2006
She has obtained 727 marks 1st Division

Date of declaration of result 23-06-2006

Elective subject _____

Distinction _____

Her conduct during her stay in this institution was Good

Checked by: _____

Date: 17-6-2006

Nur Hafsa

PRINCIPAL
RITE (F), Mansehra.

CTC

Abdul Wahid
SARFAT
ADVOCATE
ABBOTTABAD

P → (49)

770-Code-7045

STATE BANK OF PAKISTAN

dated the 08 of 06 2015

(13)

Received from the bearer Faiza Mustafa
the sum of Rs. 100000/- one lac only
to be credited to Government account under the head
on account of C.O. 2814 R/O/R

Manager

This portion to be returned to the payee as per receipt deposited by the Agent.

Note - The Bank Agent is instructed not to release money unless both portion the invoice are carefully and clearly filed in.

RECEIVED
JUN 8 2015
STATE BANK OF PAKISTAN
ABOTTABAD

See reverse

NWFP A&T 200

etc

Faiza Mustafa
SARWAR AHMED ARBAR
ADVOCATE HIGH COURT
ABOTTABAD

edw

Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar

Notification

Whereas Mst. Faiza Musharraf appealed against her disposal at the Directorate by the DEO (F) Abbottabad vide her report No. 275/EO/11 dated 18/01/2016.

And whereas an inquiry was conducted through Mr. Muhammad Shahzad Principal GHS Shinklad District Muzishra vide No. 1907-9/F/No 362/(F)/Appeal Abbottabad dated Peshawar the 10/4/2018 who submitted his report vide No. 2863 dated 04/9/2018 recommending her adjustment, recovery of the salaries she received without performing her duty and conversion of the intervening period into leave without pay.

And whereas the appellant along with the DEO (F) Abbottabad and DEO (F) Dasso (Upper) Kohistan were called for formal hearing of their respective point of view and presentation of related official record on 25/10/2019 which they all duly attended.

And whereas the Hearing Committee heard the point of view of Mst. Faiza Musharraf.

And whereas during the proceeding of the hearing the DEO (F) Abbottabad doubted the appointment of Mst. Faiza Musharraf as PST and her cadre change from PST to DM by the EDO Kohistan and further informed that upon her inter-district transfer to Abbottabad, she did not report for duty but regularly received her salaries without performing duty with the connivance of some officials in the DEO (F) office from 01/9/2012 to 30/11/2014.

And whereas the DEO (F) Dasso (Upper) Kohistan regretted provision of the official record pertaining to the case as the same was claimed to be non-available/non-existing in his office and also doubted the genuineness of her appointment as PST and change of cadre to DM.

And whereas the Appellate Authority after having considered the appeal of Faiza Musharraf, the inquiry report, the reports and point of views of the DEOs (F) Abbottabad and Dasso (Upper) Kohistan is of the view that the case may be remanded back to the DEO (F) Abbottabad for proper fact-finding inquiry being the competent authority.

Now, therefore, the Appellate Authority the Director Elementary and Secondary Education Khyber Pakhtunkhwa places Mst. Faiza Musharraf back at the disposal of the DEO (F) Abbottabad with the following further directions:

1. The authenticity as to the genuineness of the service record, her appointment as PST and then change of cadre to DM may be verified and determined from the DEO (F) Dasso (Upper) Kohistan through a formal inquiry and proceed accordingly.

ETC
M. SHARAF AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

if proved correct) she may be reported to law enforcing agencies and all the salaries drawn fraudulently be recovered from her. If proved correct, then she may be proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for non-reporting/non-performance of duty while regularly and fraudulently drawing salaries from 01/9/2012 to 30/11/2012. Compliance/implementation/progress report may be submitted to the undersigned during the whole course of the proceedings of the instant case.

Director
(Appellate Authority)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Encl. No. 122-2-5 / F.No. 362/(F) Appeal A.abad Dated Peshawar the 12-12-2012
Copy forwarded for information and necessary action to the:

- 1. District Education Office (F) Abbottabad.
- 2. District Education Officer (F) Dera (Upper) Kohistan for extending full cooperation to DEO (B) Abbottabad in the inquiry against Mst. Fatza Mushorraf d/o Mushorraf Hussain resident of District Mansehra.
- 3. Teacher concerned.
- 4. P.A. to Director E&SE Khyber Pakhtunkhwa.
- 5. Muster File.

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

etc

Shahzad Akbar

SARDAR SHAHZAD AKBAR
ADVOCATE HIGH COURT
ABBOTTABAD

Better Copy

P => (51-a)

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

NOTIFICATION:

Whereas, Mst. Faiza Musharraf appealed against her disposal at the Directorate by the DEO (F) Abbottabad vide her report No.245/EB-II dated 18.01.2016.

And whereas, an inquiry was conducted through Mr. Muhammad Shahzad Principal GHS Shinkiari District Mansehra vide No.1907-9/F.No.362/(F)/Appeal A. Abad dated Peshawar the 10.04.2018 who submitted his report vide No.2863 dated 04.09.2018 recommending her adjustment, recovery of the salaries she received without performing her duty and conversion of the intervening period into leave without pay.

And whereas, the appellant along with the DEO (F) Abbottabad and DEO (F) Daasu (Upper) Kohistan were called for formal hearing of their respective point of view and presentation of related official record on 29.10.2019 which they all duly attended.

And whereas, the Hearing Committee heard the point of view of Mst. Faiza Musharraf.

And whereas, during the proceeding of the hearing the DEO (F) Abbottabad doubted the appointment of Mst. Faiza Musharraf as PST and her cadre change from PST to DM by the EDO Kohistan and further informed that upon her inter-district transfer to Abbottabad, she did not report for duty but regularly received her salaries without performing duty with the connivance of some officials in the DEO (F) office from 01.09.2012 to 30.11.2014.

And Whereas, the DEO (F) Dassu (Upper) Kohistan regretted provision of the official record pertaining to the case as the same was claimed to be non-available / non-existing in his office and also doubted the genuineness of her appointment as PST and change of cadre to DM.

And Whereas, the Appellate Authority after having considered the appeal of Faiza Musharraf, the inquiry report, the reports and point of views of the DEOs (F) Abbottabad and Dassu (Upper) Kohistan is of the view that the case may be

CTC
SARDAR SAJJAD AKBAR
ADVOCATE GENERAL COURT

[Handwritten signature] and *[Handwritten signature]*
SDH

P ⇒ (51-6)
Better Copy

remanded back to the DEO (F) Abbottabad for proper fact-finding inquiry being the competent authority.

Now, therefore, the Appellate Authority the Director Elementary and Secondary Education Khyber Pakhtunkhwa places Mst. Faiza Musharraf back at the disposal of the DEO (F) Abbottabad with the following further directions:

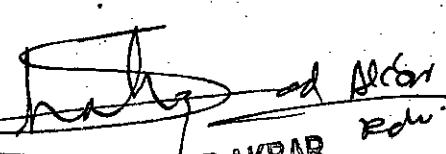
- a) The authenticity as to the genuineness of the service record, her appointment as PST and then change of cadre to DM may be verified and determined from the DEO (F) Dassu (Upper) Kohistan through a formal inquiry and proceed accordingly.
- b) If proved bogus she may be reported to law-enforcing agencies and all the salaries drawn fraudulently be recovered from her.
- c) If proved genuine then she may be proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for non-reporting/ non-performance of duty while regularly and fraudulently drawing salaries from 01.09.2012 to 30.11.2014.
- d) Compliance / implementation / progress report may be submitted to the undersigned during the whole course of the proceeding of the instant case.

Director
(Appellate Authority)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

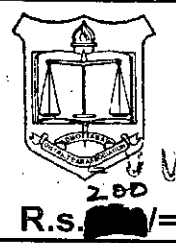
Endst: No.5122-25/F.No.362/(F)Appeal A.abad Dated Peshawar the 12.12.2019
Copy forwarded for information and necessary action to the:

1. District Education Officer (F) Abbottabad.
2. District Education Officer (F) Dassu (Upper) Kohistan for extending full cooperation to DEO (F) Abbottabad in the inquiry against Mst. Faiza Musharraf d/o Musharraf Hussain resident of District Mansehra.
3. Teacher concerned.
4. P.A. to Director E&SE Khyber Pakhtunkhwa.
5. Master File.

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

CTC

SARDAR SAIF AKBAR
ADVOCATE IN COURT
ABBOTTABAD

S.No. 155185
 Name of Advocate سردار شہزاد اکبر ایڈووکیٹ و بابر شاہ ترمیزی
 DBA NO. 343, 397 TBA NO.
 BC No. 1 0 - 2 5 6 2



Finance Secretary
 District Bar Association
 Abbottabad

بعدالت جناب جہیز تھوخواہ سرویس ٹرینینگ کونسل کراچی اور کراچی کورٹ آف ایپل اے

عنوان: مہاتہ فائزہ بی بی
 منجانب: ایبلا رٹ
 نوعیت مقدمہ سرویس ٹریننگ کونسل کے خلاف 4 دسمبر 1974ء

باعث تحریر آنکہ من بعد لکھنے والی مہاتہ فائزہ بی بی

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ایبلا رٹ آباد کے لیے
 سردار شہزاد اکبر ایڈووکیٹ و بابر شاہ ترمیزی و مسند محمد الطاف ایڈووکیٹ H.C.
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے
 جانے مقدمہ مکمل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ
 سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے
 علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ
 سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے
 کسی معاوضہ کے ادا کرنے یا جانشین کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختم صاحب موصوف
 مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم
 درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے
 اور ہر قسم کے بیان دینے اور اس پر عائشہ درامتی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات
 از پٹھان صدر اپیل و برآمدگی مقدمہ یا منوشی ڈگری یکطرفہ درخواست حکم امتناعی یا قرقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب
 موصوف کو بشرط ادا ایگی علیحدہ جتانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے
 کسی جزو کی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں
 وہی اور ایسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جاننا اتواترے گا وہ صاحب موصوف
 کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ
 کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔
 مورخہ: / / سال
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ دن ماہ سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Accepted by me
 SARDAR SHAHZAD AKBAR
 ADVOCATE HIGH COURT
 ABBOTTABAD

Receipt
 BABAR SHAH TIRMIZI
 ADVOCATE HIGH COURT
 ABBOTTABAD
 MALIK MUHAMMAD ALTAZ
 ADVOCATE HIGH COURT
 ABBOTTABAD

مہاتہ فائزہ بی بی و جہیز تھوخواہ سرویس ٹریننگ کونسل کراچی ... ایبلا رٹ

"A"

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

No.

713

APPEAL No. 7849 of 20 21

Ms. Farze Bito

Appellant/Petitioner

Versus

Director Edu. in Pk Pesh.

RESPONDENT(S)

^{Counsel}
Notice to Appellant/Petitioner

Sardar Shahzade Akbar
and Babar Shah Tirmizi
Advocate High Court
Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 18-2-2022 at 9:00 AM

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.

at Camp Road A. Road

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

7B

APPEAL No. 7849 of 20 21.

Mst. Faiza Bibi

Appellant/Petitioner

Versus

Director Edm: KP/ Pesh:

RESPONDENT(S)

Hussain

Notice to Appellant/Petitioner

Mst. Faiza Bibi D/O Musharraf

R/O Bhair Kund Tehsil

Mansehra.

Take notice that your appeal has been fixed for Pre-
replication, affidavit/counter affidavit/record/arguments/or
on 18-2-2022 at 9:00 AM

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.

at Camp Court A. Shah

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

KP
SER. TRIBUNAL