

20.04.2022

Appellant present through representative.

He made a request for adjournment in order to prepare the brief of the case. Adjourned. To come up for preliminary hearing on 17.06.2022 before S.B at Camp Court, Abbottabad.

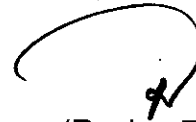


(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

17.06.2022

Junior to counsel for appellant present.

He made a request for adjournment as senior counsel is not available. Adjourned by way of last chance. To come up for preliminary hearing on 19.08.2022 before S.B at Camp Court, Abbottabad.



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

19.08.2022

Due to cancelation of tour to Camp Court, Abbottabad, case is adjourned to 21.10.2022 for the same as before.



Reader

21.10.2022

Nemo for appellant.

Notice be issued to appellant/counsel for 26.12.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.



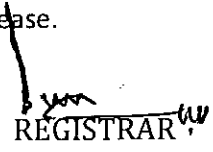


(Rozina Rehman)  
Member (J)

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 212 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/02/2022	<p>The appeal of Mst. Haseena Shaheen presented today by Mr. Nomanullah Malik 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> <p>2-</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put there on <u>19-4-22</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>19.04.2022</p> <p>Appellant present through counsel.</p> <p>He requested for a short adjournment in order to prepare the brief. Adjourned. To come up for preliminary hearing by tomorrow i.e. 20.04.2022 before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J) Camp Court, A/Abad</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST

Case Title: \_\_\_\_\_

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	NOMANULLAH	H MALIK
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	Yes	
3	Whether appeal is within time?		
4	Whether the enactment under which the appeal is filed mentioned?	Yes	
5	Whether the enactment under which the appeal is filed is correct?	Yes	
6	Whether affidavit is appended?	Yes	
7	Whether affidavit is duly attested by competent Oath Commissioner?	Yes	
8	Whether appeal/annexures are properly paged?	Yes	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	Yes	
10	Whether annexures are legible?	Yes	
11	Whether annexures are attested?	Yes	
12	Whether copies of annexures are readable/clear?	Yes	
13	Whether copy of appeal is delivered to AG/DAG?	Yes	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	Yes	
15	Whether numbers of referred cases given are correct?		
16	Whether appeal contains cutting/overwriting?		No
17	Whether list of books has been provided at the end of the appeal?	Yes	
18	Whether case relate to this court?	Yes	
19	Whether requisite number of spare copies attached?	Yes	
20	Whether complete spare copy is filed in separate file cover?	Yes	
21	Whether addresses of parties given are complete?	Yes	
22	Whether index filed?	Yes	
23	Whether index is correct?	Yes	
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		

H MALIK  
ADVOCATE

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

Name:

NOMANULLAH MALIK

Signature:

*[Handwritten Signature]*

Dated:

21/2/2022

ADVOCATE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No. 212/2022

Mrs. Haseena Shaheen V/S Education Department & others.

**SERVICE APPEAL**

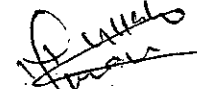
**INDEX**

Sr. No:	Description of Documents	Annexure	Page No:
(1)	Memorandum of Appeal alongwith affidavit, addresses of the parties, certificate & list of Books.	-	1 - 7 7A - 7A1
(2)	Copy of Service Book of appellent.	"A"	8 - 51
(3)	Copy of Notification No. So (B&A)/1-18/E&SE/2012, dated 11-07-2012.	"B"	524
(4)	Copies of departmental appeals/applications. <i>along receipt</i>	"C"	53 - 57
(6)	Copies of confidential report and other relevant letters showing the good performance and conduct of the appellent.	"D"	58 - 65
(7)	Copy of Departmental Appeal with Postal Receipt.	"E"	66 - 68
(8)	Vakalat Nama.		69

Dated: 21/2/2022

Haseena Shaheen  
Appellant  
(Mrs. Haseena Shaheen)

Through:-

  
(Nomanullah Malik)  
Advocate High Court  
at Haripur.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No. 212/2022

Mrs. Haseena Shaheen D/O Raja Faqir Muhammad Khan,  
PST, Govt. Girls Primary School Pandak, Tehsil & District Haripur,  
R/O Mohallah Rajgan, Village & Post Office Mankarai, Tehsil & District  
Haripur.

**Appellant**

**VERSUS**

- (1) Education Department, Govt. of Khyber Pakhtunkhwa through its  
~~Secretary~~ Director, Peshawar.
- (2) District Education Officer, Elementary & Secondary Education (Female),  
Haripur.
- (3) ADO, Circle Pharhala, Haripur.

**Respondents.**

APPEAL UNDER SECTION 4 OF K.P.K. SERVICE TRIBUNAL  
ACT, 1974 READ WITH RULE 19 OF K.P.K. GOVT. SERVANTS  
EFFICIENCY & DISCIPLINE ORDER 2001.

**PRAYER:-**

On acceptance of instant appeal the Respondents  
may graciously be directed to promote the appellant from  
BPS-12 to BPS-15 on the basis of her eligibility as per  
seniority list with effect from 11-07-2012 vide Notification  
No. So. (B&S)/1-18/E&S/2012 with arrears whatsoever.

Respectfully Sheweth:-

The facts giving rise to the instant appeal are as under:-

- (1) That the appellant has been serving in Education  
Department as PST since 30-10-1988 in BPS-12 and  
currently she is performing the assigned duties in Govt:

Girls Primary School Pandak, Tehsil & District Haripur.

(Copy of Service Book is annexed as **Annexure "A"**)

- (2) That the appellant is still performing the duties in BPS-12 in spite of fact that 32 years service tenure has been passed in the Respondent's department, but the Respondents have intentionally and deliberately deprived the appellant from promotion from BPS-12 to BPS-15 due to malafide intention.
- (3) That the appellant was ignored from *lawful* promotion time and again by the Respondents i.e. in 2012, 2013, 2014 & 2015 which is an ample instance of malafide intention and ulterior motive on the part of Respondents.
- (4) That the appellant is more qualified having qualification of B.A. in her credit and she is also senior in service than the certain PTC teachers, but the Respondents paid no intention towards these facts and deprived the appellant from her genuine and lawful right.
- (5) That the name of the appellant properly existed on the merit list of BPS-15 vide Notification No. So (B&A)/1-18/E&SE/2012, dated 11-07-2012, but the Respondent No. 3/ADO Circle Pharhala intentionally and deliberately set aside/concealed the seniority file and service book of the appellant merely to deprive her from promotion and the Respondent's department took no action on this illegal and unlawful act of Respondent No. 3/ADO Circle Pharhala, Haripur. (Copy of Notification No. So (B&A)/1-18/E&SE/2012, dated 11-07-2012 is annexed as **Annexure "B"**).
- (6) That Respondent No. 3/ADO Circle Pharhala made a concocted and fabricated case against the appellant and without issuing any warning letter or show cause notice

imposed penalty Rs:150,000/-. It is pertinent to mention here that another PST who was declared defaulter had been awarded the requisite scale on 11-07-2012, and both PST teachers were acquitted from the charge levelled against them inspite of that fact the appellant has been deprived intentionally. Inspite of repeated appeals of the appellant, she was kept deprived from promotion which is sheer violation of law and colourful exercise of powers on the part of Respondents.

(7) That the appellant preferred departmental appeals to Respondents No. 2 & 3 for her *lawful* promotion, but she received no fruitful result as yet. (Copies of departmental appeals/applications are annexed as **Annexure "C"**).

(8) That Deputy District Officer (F) Elementary & Secondary Education, Haripur recorded the remarks on Synopsis of ACR's of appellant that her work and conduct is very good and gave no adverse remarks against the appellant which is an ample instant of good performance of assigned duties. Moreover, the Deputy District Officer (F) Elementary & Secondary Education Haripur also issued Non Involvement Certificate to the appellant. The same Officer again issued 03 years result report showing good result/progress of the appellant. Another Service Certificate issued by same officer also clears the work and good conduct of the appellant. The Assistant District Officer, Azra Afridi also submitted confidential report stating therein "Fit for Promotion. (Copies of all above evidence are annexed as **Annexed "D"**).

- (9) That the appellant having no alternate avenue prefers the instant appeal before this Honourable Tribunal inter-alia on the following grounds:-

**GR OUNDS:**

- a. That non-appreciation of prolong service tenure i.e. 32 years of the appellant and her deprivation from promotion BPS-12 to BPS-15 by the Respondents is merely colourful exercise of powers which is illegal, unlawful, against the facts and law and the appellant is eligible for the requisite *Promotion* as per seniority list on merit.
- b. That the allegation levelled against the appellant is result of malafide intention of Respondent No. 3, however it is crystal clear from the record that another PST whose name was included in the defaulter's list was also upgraded from BPS-12 to BPS-15 and the appellant has been deprived intentionally illegally and unlawfully.
- c. That the appellant submitted departmental appeal to Respondent No. 1 on 26/10/2021, but in vain. (Copy of Departmental Appeal is annexed as Annexure "E")
- d. That there are so many other grounds which would be agitated at the time of hearing of the instant appeal.

It is therefore, respectfully prayed that on acceptance of instant appeal the Respondents may graciously be directed to promote the appellant from BPS-12 to BPS-15 with effect from 11-07-2012 alongwith arrears whatsoever as per Notification No. So. (B&S)/1-18/E&S/2012, on the basis of her seniority as per seniority list and prolong service tenure i.e. 32 years in the interest of justice.

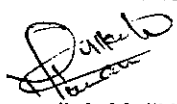


Any other relief, which this Honourable Tribunal may deem fit and appropriate, in the peculiar circumstance of the instant case may kindly be granted.

Dated: 21/2/2022

Appellant  
(Mrs. Haseena Shaheen)

Through:-

  
(Nomanullah Malik)  
Advocate High Court  
at Haripur.


VERIFICATION

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

Dated: 21/2/2022

Huseenashaheen  
Appellant  
(Mrs. Haseena Shaheen)

Through:-

  
(Nomanullah Malik)  
Advocate High Court  
at Haripur.

(5)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2021

Mrs. Haseena Shaheen. V/S Education Department & others.

**APPEAL**

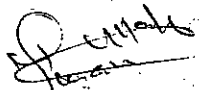
**AFFIDAVIT**

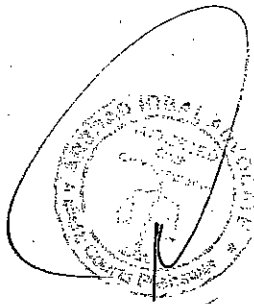
I, Mrs. Haseena Shaheen D/O Raja Faqir Muhammad Khan,  
PST, Govt: Girls Primary School Pandak, Tehsil & District Haripur,  
R/O Mohallah Rajgan, Village & Post Office Mankarai, Tehsil & District  
Haripur, do hereby solemnly affirm and declare on oath that the  
contents of accompanying Service Appeal are true and correct to the  
best of my knowledge and belief and nothing has been suppressed  
from this Honourable Tribunal.

Dated: 21/2/2022

Haseena Shaheen  
Deponent

Identified by:

  
(Nomanullah Malik)  
Advocate High Court  
at Haripur.



21.02.2022

(7)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2021

Mrs. Haseena Shaheen V/S Education Department & others.

**APPEAL**

**ADDRESSES OF THE PARTIES.**

**Appellant:**

Mrs. Haseena Shaheen D/O Raja Faqir Muhammad Khan,  
PST, Govt: Girls Primary School Pandak, Tehsil & District Haripur,  
R/O Mohallah Rajgan, Village & Post Office Mankarai, Tehsil & District  
Haripur.

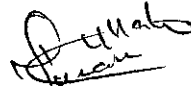
**Respondents:**

- (1) Education Department, Govt: of Khyber Pakhtunkhwa through its  
Secretary/Director, Peshawar.
- (2) District Education Officer, Elementary & Secondary Education (Female),  
Haripur.
- (3) ADO, Circle Pharhala, Haripur.

Dated: 21/7/2022

Haseena Shaheen  
Appellant  
(Mrs. Haseena Shaheen)

Through:-

  
(Nomanullah Malik)  
Advocate High Court  
at Haripur.

7A

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2021

Mrs. Haseena Shaheen V/S Education Department & others.

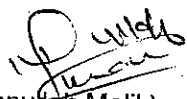
**APPEAL  
CERTIFICATE**

It is certified that the appellant prefers the accompanying appeal before this Honourable Tribunal. He neither filed any appeal in this Honourable Tribunal nor is pending and it is the first appeal in this Honourable court.

Dated: 21/2/2022

Haseena Shaheen  
Appellant  
(Mrs. Haseena Shaheen)

Through:-

  
(Nomanullah Malik)  
Advocate High Court  
at Haripur.

741

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2021

Mrs. Haseena Shaheen V/S Education Department & others.

**APPEAL**

**LIST OF BOOKS**

- (1) Servant Act 1974.
- (2) K.P.K. Services Rules E&D 2011.
- (3) Other Ruling of High Courts, Superior Courts and Service Tribunal will be cited at the time of hearing.

Dated: 21/2/2021

*Huseenashaheen*  
Appellant  
(Mrs. Haseena Shaheen)

Through:-

*Nomanullah Malik*  
(Nomanullah Malik)  
Advocate High Court  
at Haripur.

S.No. 130  
2013-16-21-2018

# SERVICE BOOK

7 To 12

پست (پست)

والد کا نام ذرا لکھو

BA

PST

12

مستحق اور غنت

علی آباد

مستحق اور غنت

مستحق اور غنت

مستحق اور غنت

Accepted to be  
signature  
by  
M. J. Khan

S.No. 180  
10013-16-221-228

# SERVICE BOOK

To 12

Alotted to be true  
Punjab  
India

Name محمد رفیق خان  
 Father's Name محمد رفیق خان  
 Qualification پہلے  
 Designation سید کمال  
 Department پبلک ورکس  
 Permanent Address گالہ پورہ

GS&PD, NWFP-1595 P.B. 50,000 B. 7-547-(25)

Handwritten marks and initials at the bottom left corner.

Handwritten signature or name at the bottom center.

832806-1308

1968 Bank of Punjab



حکومت پاکستان  
قومی شناختی کارڈ  
13302-1220501-0



نام: سوز شاہین  
جنس: عورت  
پیدائشی تاریخ: 03/04/1968

شمارہ شناختی کارڈ: 13302-1220501-0  
تاریخ: 03/04/1968

دستخط: سلیم حسن



University of Peshawar  
(PAKISTAN)



Provisional Certificate

SESSION 1999

Examination :- Annual Supplementary

Certified that Haseena Shaheen

son / daughter of Raja Faqir Muhammad

and a candidate / student of District Hanjra

has passed the Bachelor of Arts

Examination held in Feb 2000

by securing 239 marks out of 550 and is placed in Third Division

The examination was taken as a whole / in parts.

No 037765

Attested  
to be true  
*[Signature]*

97-PS-17609

Registration No. \_\_\_\_\_

Roll No. 33981

Result declared on 28-4-2000

*[Signature]*  
Asstt. Controller of Examinations  
University of Peshawar  
R

# UNIVERSITY OF PESHAWAR

(PAKISTAN)

No. 003560



## DETAILED MARKS CERTIFICATE

Roll No 23511

BA PART-11 EXAMINATION, 1999. (Annual/Supplementary)

Mr./Ms. Hussana Shahzad

Certified that the subjects offered and marks obtained by the candidate are as under :

SUBJECTS	MARKS OBTAINED		
	MAXIMUM MARKS	IN FIGURE	MARKS IN WORDS
1. English	75	24	Twenty four
2. Urdu	75	29	Twenty nine
3. Islamic Studies	75	25	Twenty five
4. Pakistan Studies	40	19	Nineteen only
B.A. Part-I marks	285	112	
<b>TOTAL</b>	<b>550</b>	<b>239</b>	<b>Two hundred &amp; thirty nine</b>

Errors & omissions are subject to subsequent rectification

The Examination was taken as Whole in Parts.

RESULT DECLARATION DATE \_\_\_\_\_

Date 9/5/2000

CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

H. Shahzad  
 23511  
 9/5/2000

(17)

S-B.

IPC

3797

12

969

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**

**ABBOTTABAD  
N.W.F.P. PAKISTAN  
PROVISIONAL CERTIFICATE**

INTERMEDIATE EXAMINATION

Session 1995 Annual/Supplementary

Humanities Group

THIS IS TO CERTIFY THAT Hussaina Shaeen  
 Son/daughter of Raja Faqir Muhammad  
 and a candidate of Haripur  
 Registered No \_\_\_\_\_ has passed the INTERMEDIATE EXAMINATION of the  
 Board of Intermediate & Secondary Education Abbottabad held in Dec 19 95  
 as a Regular/Private candidate. He/She obtained 464 Marks out of 1100 and  
 has been placed in Grade (D) Representing Fair

The Examination was taken as a whole/in parts \_\_\_\_\_

Prepared by Amal

Checked by \_\_\_\_\_

Date of Preparation 13/3/96

Attested  
 Shabir  
 Head Mistress  
 Girls High School  
 No. 12 Haripur

Asst. Secretary (Certificates)  
 Board of Intermediate &  
 Secondary Education Abbottabad

Attested  
 Ali-ud-Din Shakhzad  
 S.D.O. (F)  
 HARIPUR

Attested to be correct  
 by Amal

(13) (2)

## Board of Intermediate & Secondary Education ABBOTTABAD

10737

S. No: A

**DETAILED MARKS CERTIFICATE**  
Intermediate Examination (Humanities Group)  
Part - II  
Session 19 95 (Annual/Supplementary)



Name Hussena Shabeen

Father's Name Raja Faqir Mohammad Khan Roll No. 969

SUBJECT	Subjects Marks	MARKS OBTAINED			
		Part - I	Part - II	Total in	
				Figures	Words
1. English	200			72	
2. Urdu	200			90	
3. Islamic Education	50			62	
4. Pakistan Studies	50			81	
5. IH	200			83	
6. CW	200			76	
7. WA	200			464	
<b>Total</b>	<b>1100</b>				

*Accessed*  
*Shabeen A*  
 Head Mistress  
 Love Girls High Sch.  
 No. 2 Maripus

*(Four Hundred & Sixty four)*

Note: Errors/Omissions excepted

2 MAR 1996

Date \_\_\_\_\_ 19 \_\_\_\_\_

Prepared by: [Signature]

Checked by: [Signature]

*[Signature]*

Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Attested to  
be true

*[Signature]*

s.No 577983

16  
Roll No. 1639



**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 1987 SUPPLEMENTARY

THIS IS TO CERTIFY THAT Hussna Shaheen

Son/Daughter of Raja Faqeer Mohammad Khan

and a resident of Abbottabad District

has passed the *Secondary School Certificate Examination*  
of the Board of Intermediate & Secondary Education, Peshawar held in October 1987 as  
a *Private Candidate*. He/She obtained 339 Marks out of 850

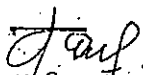
and has been placed in Grade E Representing Satisfactory

The Candidate passed in the following subjects:

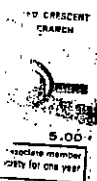
- |            |                     |                 |                     |
|------------|---------------------|-----------------|---------------------|
| 1. English | 3. Islamiyat        | 5. Gen: Science | 7. Gen: Mathematics |
| 2. Urdu    | 4. Pakistan Studies | 6. Isl: Studies | 8. Civics           |

Date of birth according to admission form is Third April,

one thousand nine hundred and Sixty six 03-4-1968

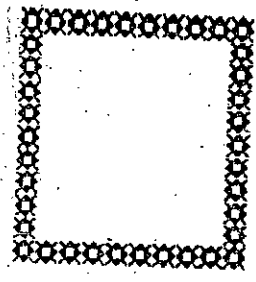
  
Asstt Secretary  
28th January 1988

Attested to be true  
  
Secretary  
This certificate is issued without alteration or erasure



13

Q



### DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in North-West Frontier Province having been born/~~settled~~ in this province.

I was born at village/~~mohallah~~ MANAKRAI, MOHALLAH RAJGAN  
Tehsil HARIPUR District ABBOTTABAD, HAZARA DIVISION

Huseena Shaheen  
SIGNATURE OF THE APPLICANT

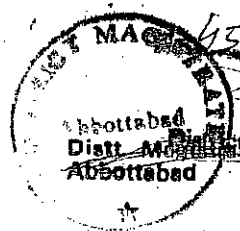
DATED 9.2.1988

Pursuant to the declaration dated 9.2.1988

filed by ~~Mr~~ MISS ROSEENA SHAHEEN, S/o RAJA FAGEER KHAN  
domiciled in North-West Frontier Province. It is hereby certified that the  
said HUSEENA SHAHEEN is born of parents who are permanent residents of the  
North-West Province having been born/~~settled~~ within it.

I have satisfied myself from ~~personal~~ <sup>my own</sup> knowledge/verification  
that the above declaration is true and certify accordingly.

This 10th day of February 1988



Countersigned  
Magistrate Abbottabad

Dated 10.2.88  
MAGISTRATE 1ST CLASS  
HARIPUR

Attested to be true  
[Signature]

The form can be had from Syed Munir Hussain Shah Haripur Hazara  
Madina Stationery Mart Rahmania Road, Haripur Hazara Ph : 3230

1255  
I have passed the 5th class from an Middle school. Name

To My Dear

Saeeda Akhlaq  
1255

میرا نام سیدہ سہیل ہے۔ میں نے پچھلے سال  
پانچویں کلاس میں امتحان دیا تھا۔

میں نے اس امتحان میں اچھے نمبروں سے پاس کیا ہے۔  
میں نے اس امتحان میں اچھے نمبروں سے پاس کیا ہے۔

9/2  
1255

9/2  
1255

2

- 1- نام مستتر -
- 2- نام سوال - گورنمنٹ ٹریننگ کالج
- 3- نام معلم / ملازم / ملازمین - حسینہ شاہین - وزارت برصغیر ہندوستان
- 4- شناختی کارڈ نمبر 056003-88-122 (5) تاریخ پیدائش 68.6.68
- 6- تاریخ آغاز ملازمت 30.10.88 (7) آئی ڈی نمبر 1000
- 8- ٹی ایچ ڈی نمبر اگر ہے تو x (9) تنگ ادوار نمبر اگر ہے تو x
- 10- جی بی ایف ایف ڈی ایس اگر ہے تو رقم
- 11- تنخواہ سے GPF ایوارڈ کی جوڑی سے نو عابور فیس
- 12- عادی جوڑی ایسے میں کتنی رقم ادا کی اور باقی رقم
- 13- بعد از مرگ GPF کے حقدار اور ان سے رشتہ
- 1- نام - لڑیم گوتمبرکان بابرخان رشتہ
- 14- اگر شادی شدہ جوڑی شہر نام x شناختی کارڈ نمبر x
- 15- تمام بچوں کے نام بعد تاریخ پیدائش

1	
2	
3	
4	
5	
6	

Attested to be true  
 H. Shah  
 Khan

Museena Shaheen

Museena Shaheed

عمر 50 سال



Revised D.M.C. of the Government,  
 GS&P.D. NWFP. - 546 Dir. E 14, 3000 P. - 22 11-92 - (30)

**DETAIL MARKS CERTIFICATE.**

**P.T.O. EXAMINATION 1992 (CONDENSED COURSE) NEW**

Roll No. 743

Name Huseena Shah Son/Daughter of Faqir Muhammad Khan

(17)

Serial No.	SUBJECT	Max. Marks	Marks Obtained	
			In Figures	In Words
1.	Principles of Education	50	21	
2.	Child Development and Council	50	17	
3.	School Organization	50	23	
4.	Urdu/Pashto	50	21	
5.	Arts and Crafts	50	36	
6.	Islamiat and S. Studies	100	50	
7.	Maths/Science	100	38	
8.	Teaching Practice	50	26	
	<b>Total</b>	<b>500</b>	<b>232</b>	

Attended  
 Mumtaz Shah  
 24-8-93

FAILED/PASSED  
 Division..... 11

Prepared by.....  
 Checked by.....

Result Declared on 7/4/93

- N. B.— 1. Passed percentage 33% and Aggregate 40%  
 2. Marks in Circle not to be counted.  
 3. Grace marks not to be counted.  
 4. A candidate may be considered un-successful in the subject comprising of theory and practical if he fails Theory of the said Subject.

Attended to be kept  
 [Signature]

Registrar,  
 Departmental Examinations,  
 Education Department,  
 N.-W.F.P., Peshawar.

(11) (19)

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) HARIPUR.  
No. 225 / Appt  
To

L:Vac: Dated Haripur the, 19/12

Mst, Naheed Akter  
Mo R Farque Ullah  
R/o Alordi Haripur

SUBJECT: APPOINTMENT IN LEAVE VACANCY.  
Memo:

You are hereby allowed temporarily to take charge of the leave vacancy of Mst. Naheed Akter who has proceeded on leave for the period wef. 1-1-85 to 28-3-85 at Govt Girls Middle Primary School, Alordi wef date of your taking over charge.

Please note that you will not be paid any pay and allowances if your appointment is not approved by the District Education Officer (Female) / Director of Education Hazara Division Abbottabad (Schols).

You are also directed to produce Health & Age Certificate from the, M.S, District Head Quarter Hospital Abbottabad within seven days so that your pay could be drawn on the approval of your appointment by the competent authority.

Sub Divl: Edu: Officer (Female),  
Haripur Sub Division Haripur.

Encl: No. / Appt: L: Vac: Dated Haripur the,

Copy to:-

1. The District Education Officer (F) A-Abad District with the request that necessary approval of appointment may very kindly accord at an early date please (Application & Other documents are attached).
2. The Head Teacher Govt: Girls Middle Primary School, Alordi for necessary and necessary action.

Sub Divl: Edu: Officer (Female)  
Haripur Sub Division Haripur

Accepted to  
be true  
F. Ullah

19

~~12~~ ~~17~~

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (F) HARIPUR.

ADJUSTMENT/CANCELLATION.

Exchange of post between Furrakh Taj PTC GGPS Gheran Rasheeda Bibi GGPS Makhan ordered vive this office Endst: No.2010-13 dated 26-8-1997, is hereby cancelled.

Met: Hussina Shaheen PTC under order of adjustment at GGPS Laban Bandi is hereby allowed to continue at GGPS Mankerai by held in obedience of the order.

Tahzeem Bibi PTC GGPS Nara Amazai is hereby adjusted at GGPS Kohala Payen against vacant PTC post on her own pay and grade in the interest of public service.

- Note: 1. No TA/DA is allowed.  
 2. Charge report should be sent in duplicate.

*Sd/-*  
Sub Divisional Education Officer  
(F) Haripur.

Endst: No. 2197-2267 /PTC Dated: 30/6 /1997.

Copy for information to the:-

1. Director, Primary Education NWFP Peshawar.
2. Distt: Education Officer (F) FRY: Haripur.
3. Acctt: local office.

*[Signature]*  
Sub Divisional Education Officer  
(F) Haripur.

*Attended to by  
sent  
of copies  
[Signature]*

NATIONALIZATION:-

In compliance with the Director, Primary Education (WFP) Resolves NO. 1-NO. 5/DFE/PRI/MS/AC(WFP) dated 13-6-1997, adjustments of the following surplus teachers are hereby ordered on 30.06.1997. The grade in the school noted against the name of each teacher is to be maintained. The order is to be implemented with immediate effect:-

Sl. No.	Name of teacher, with school name	Remarks
1-	Hargis Bibi FFC GGPS S/No. 1, S/No. I.	Adjusted to maintain ratio of 1:10
2-	Naz Parveen FFC GGPS NO. 2, Hariqur.	GGPS Mohra Maqsood
3-	Robina Shaheen FFC GGPS S/No. 1, S/No. I.	GGPS Akhtar Band
4-	Husina Shaheen FFC GGPS S/No. 1, Mankarai.	GGPS Laban Band
5-	Zohra Bibi FFC GGPS C/Jail.	GGPS Dana, Ferozpur
6-	Saeeda Mehmood FFC GGPS NO. 1, Hariqur.	GGPS Mohri NO. 2
7-	Umzi Khatun FFC GGPS KTS-NO. 2, PS: NO. 1	GGPS Mohri NO. 2
8-	Bushra Nazli FFC GGPS KTS-3	GGPS Bagra
9-	Zahida Bibi FFC GGPS KTS-2	GGPS Gauri S/No. 1
10-	Ishida Bibi FFC GGPS P.K. Khan	GGPS Kailaga
11-	Shamala Yasmin FFC GGPS Gauri GGPS Darra.	
12-	Samina Akhtar FFC GGPS, Malikyar.	GGPS Bahi Munia
13-	Naveeda Bibi FFC PS: Nojafpur	GGPS Khoi Naza
14-	Sajida Bibi FFC PS: Saltanpur	GGPS Gauri Syedan
15-	Rishwar Naseem FFC GGPS Fefkian.	GGPS Garamthoon
16-	Naseem Sultana FFC Mhaspur.	GGPS Chhoi
17-	Nadia FFC GGPS Sangian.	GGPS Gucha Dhak
18-	Zahida Bibi FFC GGPS Nojafpur.	GGPS Bagpur Dhak
19-	Nashida Kousar FFC GGPS, KTS NO. 2 PS: NO. 1.	GGPS KTS NO. 2 PS: NO. 2
20-	Zahida Begum FFC PS: KTS-4.	GGPS Gauri
21-	Bibi Zaitoon FFC PS: NO. 2 PS: NO. 1	GGPS Pkharari

Adjusted to be true  
*[Signature]*

21 (H) 23  
 OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) HARIPUR.  
 POSTING/TRANSF.

As approved by the competent authority the following Posting/Transfer of Education Department are hereby ordered on their own pay & Grade in the interest of public service with immediate effect, in relaxation of ban by the Hon: Chief Minister NWFP Peshawer

Sl. No.	From School	To	Remarks
1.	Abdul Muneem PT GHS Khan Pur Haripur	GHS Tofkian	Vice S.No II
2.	Muhammad Sultan PT GHS Tofkian Haripur	GHS Khan pur	Vice S.No 1 (Mutual Tr)
3.	Zahoor Akhter PTC GPS Khan pur No I	GPS Khai Maria	Vice S.No 4
4.	Shoukat Mehmood PTC GPS Khai Maria	GPS Khan pur I	Vice S.No 3 (Mutual)
5.	Abdul aziz Peon GHS No II	GHS Tofkian	Against V.Pest
6.	Misbah Bukhari PTC GGPS Mallat Haripur	GGPS Sultanpur	...do.....
7.	Munshi Khan PTC GPS Kumbala	GPS Sarhadana	...do.....
8.	Muhammad Tufail PTC GHS S.N.Khan	GHS Neer Pur	...do....
9.	Shaziq Ahmad PTC GPS Neer Colony	GPS No II Haripur	Vice S.No 10
10.	Chenzab PTC GPS No II Haripur	GPS Neer Colony	Vice S.No 09
11.	Margos Sultana GGPS Babetri	GGPS Tofkian	against V.Pest
12.	Rizwan DM GMS Moonan Haripur	GHS No I Haripur	Vice S.No 13
13.	Raza Muhammad DM GHS No I Haripur	GMS Moonan	Vice S.No 12
14.	Aysha Siddique PTC GGPS Kalu Find Haripur	GGPS Taleker	Vice S.No 15
15.	Riffat Bibi PTC GGPS Kalu Find Haripur	GGPS Kalu Find	Vice S.No 14
16.	Akhter Nawaz PTC GPS Taleker	GPS Gujartian	against V.Pest
17.	Hazeena Shaheen PTC GGPS Magri	GGPS Nartopa	Vice S.No 18
18.	Rubina Qureshi PTC GGPS Nartopa Haripur	GGPS Magri	Vice S.No 17
19.	Nazmia Shaheen PTC GGPS Darwash	GGPS KTS No I	Vice S.No 20
20.	Samina Nasir PTC GGPS KTS I	GGPS Darwash	Vice S.No 19 (Mutual Transf)

Note:- No TA DA & TG is allowed to any one.  
 No Contract Teacher is allowed to relive the charge  
 No Single Teacher is allowed to relive till the arrival of his/Her substitute.

(SYED SALAH UD DIN SHAH)  
 EXECUTIVE DISTRICT OFFICER  
 (SCHOOLS & LITERACY) HARIPUR

And it: No. 14698-05 / Dated 27/11 / 2004.

- Copy to the :-
- SO(1) Chief Minister Sectt: NWFP Peshawer w/r to his No.s SO(1) SOM/3-15 Dated 24/9/2004 for information please.
  - Hon: Minister for Sports, Culture, Tourism, Museums, NWFP Peshawer
  - The Zila Nazim Haripur
  - P/S to District Coordination Officer Haripur
  - P/S to Director S&L NWFP Peshawer.
  - DO(M&P) Schools & Literacy Haripur for necessary action.
  - By: DO(M&P) Schools & Literacy Haripur for n/a
  - Prin / Headmaster all concerned Ms P/S, Office order file.

*Attested to be true*  
*P. J. Khan*

EXECUTIVE DISTRICT OFFICE  
 (SCHOOLS & LITERACY)

As approved by the competent authority the following Posting/Transfer of Education Department are hereby ordered on their own pay & Grade in the interest of public service with immediate effect in relaxation of ban by the Hon: Chief Minister NWFP Peshawer

S.No	Name of School	To	Remarks
1.	Abdul Hameed TT GHS Khan Far Haripur	GHS Tofkian	Vice S.No II
2.	Muhammed Sultan TT GHS Tofkian Haripur	GHS Khan pur	Vice S.No 1 (Mutual Tr)
3.	Zahoor Akhter PTC GPS Khan pur No I	GPS Khei Maria	Vice S.No 4
4.	Shoukat Mahmood PTC GPS Khei Maria	GPS Khan pur I	Vice S.No 3 (Mutual)
5.	Abdul aziz PTC GHS No II	GHS Tofkian	Against V.Post
6.	Misbah Bukhari PTC GGPS Mallat Haripur	GGPS Sultanpur	...do.....
7.	Famshi Khan PTC GPS Fumbala	GPS Sarhadana	...do.....
8.	Muhammed Tufsih PTC GHS S.N.Khan	GHS Noor Fur	...do.....
9.	Shafiq Ahmad PTC GPS Noor Colony	GPS No II H.Pur	Vice S.No 10
10.	Chanzab PTC GPS No II H.Pur	GPS Noor Colony	Vice S.No 09
11.	Marsos Sultana GGPS Babetri	GGPS Tofkian	against V.Post
12.	Rizwan DM GHS Moonan Haripur	GHS No I H.Pur	Vice S.No 15
13.	Raza Muhammed DM GHS No I H.Pur	GHS Moonan	Vice S.No 12
14.	Aysha Siddique PTC GGPS Kala Pind Haripur	GGPS Taleker	Vice S.No 15
15.	Rifat Bibi PTC GGPS Kala Pind Haripur	GGPS Kala Pind	Vice S.No 14
16.	Akhter Nawaz PTC GPS Taleker	GPS Gujaratian	against V.Post
17.	Haseena Shaheen PTC GGPS Magri	GGPS Nartopa	Vice S.No 11
18.	Rubina Qureshi PTC GGPS Nartopa Haripur	GGPS Magri	Vice S.No 11
19.	Nazmia Shaheen PTC GGPS Darwash	GGPS KTS No I	Vice S.No 2
20.	Sadia Nasir PTC GGPS KTS I	GGPS Darwash	Vice S.No 19 (Mutual Transf)

Note:- No TA DA & TG is allowed to any one.  
 No Contract Teacher is allowed to relive the charge  
 No single teacher is allowed to relive till the arrival of his/her substitute.

(SYED SALAH UD DIN SHAH)  
 EXECUTIVE DISTRICT OFFICER  
 (SCHOOLS & LITERACY) HARIPUR

And it: No. 14698-05 / Dated 27/11 / 2004.

- Copy to the :-
1. SO(1) Chief Minister Pectt: NWFP Peshawer w/r to his No. 8 EC(I) SO(1)/3-15 Dated 24/9/2004 for information please.
  2. Hon: Minister for Sports, Culture, Tourism, Museums, NWFP Peshawer
  3. The Zila Nazim Haripur
  4. P/S to District Coordination Officer Haripur
  5. P/S to Director S&L NWFP Peshawer.
  6. DO(M&F) Schools & Literacy Haripur for necessary action.
  7. Dy: DO(M&F) Schools & Literacy Haripur for n/a
  8. Prin / Headmaster all concerned No. P/9, Office order file.

Attended to  
 be true  
 [Signature]

EXECUTIVE DISTRICT OFFICE  
 SCHOOLS & LITERACY

(16) (23)


**OFFICE OF THE DEPUTY DISTRICT OFFICER (FEMALE) E & S EDUCATION HARIPUR.**

**Mutual Transfer**

The following Mutual transfer of PST (female) are hereby ordered on their own pay and grade in the interest of public service with immediate effect:-

S.No	Name of Teacher & School	To	Remarks
01	Haseena Shaheen PST GGPS Kahaka	GGPS Awan Mohra	Vice s.no 2
02	Razia Bagum PST GGPS Awan Mohra	GGPS Kahaka	Vice s.no 1

Note;-Charge Report should be sent to all concerned.  
No TA DA is allowed.

  
DEPUTY DISTRICT OFFICER (FEMALE)  
E&S EDUCATION HARIPUR


Endst No'- 2088-93

Dated Haripur the 08/11/2012.

Copy to the:-

1. The Executive District Officer E & S Education Haripur.
2. District Education Officer E & S Education Haripur.
3. ADO concerned
4. Head Teacher concerned.
5. Office file.

*Attended to be  
your  
Punah*

  
DEPUTY DISTRICT OFFICER (FEMALE)  
E&S EDUCATION HARIPUR

(17) (26)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEM: & SEC:EDU: HARIPUR**

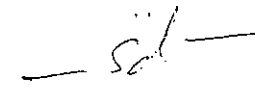
**Adjustment:**

Consequent upon the approval of the competent authority the following adjustment in E & S E Deptt: Haripur are here by made in the interest of Public Service

S.No	Name & Address	To	Remarks
1	Yasmin Bibi PST GGPS Khaka	GGPS Nartopa	Vice S.No.2
2	Hascena Shaheen PST GGPS Nartopa	GGPS Khaka	Vice S.No.1

**Note:**

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


  
Executive District Officer  
Elementary & Secondary Education  
Haripur

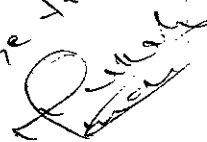
Endt: No. 1932-35

Dated: 22/11/2010

**Copy to the**

1. Headmistress Concern.
2. Account Branch Local Office.

  
District Officer (Female)  
Elementary & Secondary Education  
Haripur

Attested to  
be true  




(25)

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) HARIPUR.  
No. 2225 / Apptt: on L: Vac: Dated Haripur the 29/2/88  
To

Mst, Hussina Chahaa  
Mo Raja Fozia Uba  
R/o M. H. H. H. H.

SUBJECT: APPOINTMENT IN LEAVE VACANCY.  
Memo:

You are hereby allowed temporarily to take charge in the leave vacancy of Mst. Nasir Afroz M. who has proceeded on leave for the period wef. 1-1-88 to 28-2-88 at Govt. Girls Madre Primary School, Nasidi wef date of your taking over charge.

Please note that you will not be paid any pay and allowances if your appointment is not approved by the District Education Officer (Female) / Director of Education Hazara Division, Abbottabad (Schols).

You are also directed to produce Health & Age Certificate from the, M.S, District Head Quarter Hospital, Abbottabad within seven days so that your pay could be drawn on the approval of your appointment by the competent authority.

M. A. M.  
Sub Divl: Edu: Officer (Female),  
Haripur Sub Division Haripur.

Endst: No. \_\_\_\_\_ / Apptt: L: Vac: Dated Haripur the, \_\_\_\_\_ / 88.

Copy to:

1. The District Education Officer (F) A-Abad District with the request that necessary approval of appointment may very kindly accorded at an early date please (Application & Other documents are Att.)
2. The Head Teacher Govt. Girls Madre Primary School, Nasidi for information & necessary action.

Sd  
Sub Divl: Edu: Officer (Female),  
Haripur Sub Division Haripur.

*A. H. H. H. H.*  
*Q. H. H. H. H.*



26

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
HARIPUR**  
(Office Phone No. 0995-613244 Fax No. 0995-615140)

**NOTIFICATION:**

1. **Whereas, Mst: Haseena Shaheen PST GGPS Awan Mohra District Haripur** was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules-2011, on the charges of willful absenteeism from her duty.
2. **And Whereas, show cause notices** were served upon Mst: Haseena Shaheen PST GGPS Awan Mohra Haripur at her home address vide this office No. 6092-93/DEO(F) Haripur/Estb: Pry/Discipl Action dated 16/06/2015, 7781-85 DEO(F) Haripur/Estb: Pry/Discipl Act dated 10/08/2015, 7838 dated 12/08/2015, 18466-70 / DEO(F) Haripur/Estb: Pry/Discipl Action dated 21/08/2015 & 14247-51 DEO(F) Haripur/Estab: Pri/Haseena Shaheen dated 04/12/2015 for resuming her duty within Seven (7) days of the issuance of the notices.
3. **And Whereas Mst: Samina Mushtaq Principal GGHS Sarai Selah** was appointed as inquiry officer vide this office notification No. 9332/DEO(F)Haripur/Estb: Pry /Discip Act dated 05/10/2015.
4. **And Whereas** the inquiry officer after having examine the charges, evidence on the record submitted the report vide letter No. 165 /Inquiry/File dated 20/10/2015.
5. **And Whereas, Mst: Haseena Shaheen PST GGPS Awan Mohra Haripur** was called for personal hearing vide letter No.9129 dated 22-09-2015 and 14440 dated 11-12-2015. However she badly failed to appear before the authority within the stipulated time and hence rendered herself liable to an ex- parte action.
6. **And Whereas, The authority** having considered the charges, evidence on the record as per report of inquiry officer, ASDEO (F) Circle Pharhalla, SDEO (F) Haripur and giving the opportunity of personal hearing /appearing in person, to the accused teacher, is of the view that the charges leveled against her have been proved.
7. **Now, Therefore**, in exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary ) Rules 2011, rule 2 (b (iv), the Competent authority is pleased to impose the **Major Penalty Of Compulsory Retirement From Service, upon Mst: Haseena Shaheen PST GGPS Awan Mohra Haripur with immediate effect.**

(Naheed Arjum)

District Education Officer (Female)  
Haripur.  
(Competent authority)

446-54

Endst; No \_\_\_/DEO (F) Haripur/Estab;Pry /Haseena shaheen PST, Dated Haripur the 19/01/2016  
Copy forwarded for information and n/action to the;

1. Director E & S Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Haripur.
3. Senior District Accounts Officer Haripur.
4. SDEO (F) Haripur with the directions to make necessary arrangements for the recovery of the whole pecuniary losses caused to Government Exchequer by receiving salary and allowances during the absence period.
5. District Monitoring Officer E & SE Haripur.
6. ASDEO (F) Circle concerned.
7. Primary School Head Teacher GGPS Awan Mohra Haripur.
8. Mst Haseena Shaheen PST GGPS Awan Mohra Haripur.
9. ADO Estab Primary Local Office.
10. Master File.

District Education Officer (Female)  
Haripur

Hastad to  
be true  
[Signature]

**FORM III**

**FORM OF LEAVE ACCOUNT UNDER THE REVISED LEAVE RULE, 1981.**

Leave Account of Mr./Miss/Mrs. Haseema Shakeem Father Name Raja Fajiz Khan  
 Date of Commencement of Service 30.10.88 Date of Birth 03.04.68 Designation PST  
 Date of attaining the age of superannuation 19.01.16 (N.B.—Instruction for filling in the form are printed on reverse)

Government/Department served under	LEAVE TAKEN (From column 8 to 20)																				Remarks
	PERIOD OF DUTY				Leave earned on full pay 4- days for each calendar month.	Leave at credit (column 7 & 6)		PERIOD			LEAVE ON HALF PAY			LEAVE NOT DUE		ABSENCE		Table Leave (column 10+11+12+ 14+15+17+19)	Balance on 1-7-1978/revise from leave (column 7-20)		
	From	To	Y.M.D.	Full Calendar months		Days	Day s	From	To	Days	Days	Days	Days	Days	Days	Days	Days			Days	
EDUCATION DEPARTMENT	30 <sup>10</sup> / <sub>88</sub>	03 <sup>5</sup> / <sub>11</sub>	22	06	03	=	270														
	24 <sup>5</sup> / <sub>11</sub>	To 10 <sup>2</sup> / <sub>12</sub>	01-03-16	=	16	+ 249 =	265	11 <sup>9</sup> / <sub>12</sub>	To 25 <sup>9</sup> / <sub>12</sub>	=	15 day e/Leave Full Pay =	249									
	26 <sup>9</sup> / <sub>12</sub>	To 14 <sup>2</sup> / <sub>14</sub>	01-04-18	=	17	+ 250 =	267	15 <sup>2</sup> / <sub>14</sub>	To 15 <sup>5</sup> / <sub>14</sub>	=	90 day Maternity Leave	267									
	16 <sup>5</sup> / <sub>14</sub>	To 19 <sup>1</sup> / <sub>16</sub>	01-08-03	=	20	+ 267 =	287	Leave Encashment		287 days											

*to be returned*  
*attached*

(20)

738

122-88-054003

221/1010 13585/2

Cite 1

Attested to  
by two

*[Signature]*  
James

(For use in Police Department only).

Heirs,

1. Passed B.A Exam: from University of
2. Peshawar Under Roll No: 33991, Session
3. 1999 marks obtained 239/550, Result declared on 28-4-2000.

*[Signature]*  
S.D.P.O. (P)  
HARIPUR

Verification Roll No.      dated      received back

Left thumb-impression.

Qualification	Date	Qualifications	Date
English	Passed SSC Exam under R. No. 1639 in 1987 (3) in 2nd class	First Arts	Passed P.T.C. (Condensed) under R. No. 793 in 1992
Pashtu	Obtaining 239/550 in 2nd class	B. L. or B. A.	Reg. Deptt. Exam: Pashtu obtain - 97.22 marks Result declared on 7-4
Urdu		Pleadership examination	<i>[Signature]</i>
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
Drill instructing	Passed Intermediate Examination 1985 (An from 'The Board of Intermediate' Education Abbottabad Under Roll No. 9)		
Court duties	Securing 464/1100 marks. The Regd declared on 03-3-1986		
Reserve duties	<i>[Signature]</i> S.D.P.O. (P) HARIPUR		

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

010. 005 2-53

29

NK No 100-08-056003

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

1. Name *Hussena, Shabeen*

2. Race *Pak.*

3. Residence *vill: S P O Mankaran Teh Haripur Distt. Abbottabad.*

4. Father's name and residence *Raja Fagiro Khan*

5. Date of birth by Christian era as nearly as can be ascertained *9-4-1968*

6. Exact height by measurement *5-5*

7. Personal marks for identification *nil*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger. Ring Finger

Middle Finger. Fore Finger

Thumb.

9. Signature of Government servant. *Hussena Shabeen*

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

*SHabeen*

*Attested to be*

*True*  
*[Signature]*

32

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. 371 C. S. B.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
GIS Nordini			750	fixed		30/10/88	Huseena Shah
- Do -						12/88	Huseena Shah
			750			12/88	Huseena Shah
P.S			750			12/89	Huseena Shah
M.S. [unclear]			750			9/5/90	Huseena Shah
M.S. Mankar	B.P.S.R	1095	60	1995		1/6/91	Huseena Shah
D.		1095	1215			1/12/91	Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah
							Huseena Shah

Office of the Assistant Comptroller  
 H.W. & P. Department  
 City Road, Lucknow - 226001  
 (U) No. 1095/1215/14-1508

Assistant Comptroller  
 and Finance Officer

may please see  
 @ 120/- MP (6/6/30/6/93)  
 ₹ 3000/-

A/103 office of

1985

12/83

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
Mr. S. D. F. Hazra	30-11-83	Expiry	Mr. S. D. F.				Appointed against post vide office of the S.D.F. order No. 8642-45.
Mr. S. D. F.	30-11-84		Mr. S. D. F.				
Mr. S. D. F.	1-5-90	Transfer	Mr. S. D. F.				
Mr. S. D. F.	10-12-90	Transfer	Mr. S. D. F.				
Mr. S. D. F.	30-11-91	B-PSR	Mr. S. D. F.				
Mr. S. D. F.	30-11-91	Expiry	Mr. S. D. F.				
Mr. S. D. F.	30-11-92	Expiry	Mr. S. D. F.			1-12-90	30-11-92
Mr. S. D. F.	30-11-92		Mr. S. D. F.				
<p>Certified that amounting to Rs 3000/- is overpayment has been deducted out of her Pay through regular Pay bill @ Rs 120/- PM Wef 8/83 to 8/85.</p>							
Mr. S. D. F.	30-11-93		Mr. S. D. F.				

Attested to be  
 [Signature]



NIC 122-88-054003

(88)

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating (i) whether appointment or re-appointment (ii) whether service counts under Art. 371 C.S.R.	If officiating, state (i) substantive or (ii) officiating	Pay in substantive post	Additional pay for officiating	Other entitlement under pay	Date of appointment	Signature of Government official
GP PS			1155/-			1/12	HLSR P. No. 27 (1988-8-2-885)
						1/12	HLSR P. No. 27 (1988-8-2-885)
			1561/-			1/6	HLSR P. No. 27 (1988-8-2-885)
			1642/-			1/12	HLSR P. No. 27 (1988-8-2-885)
			1733/- PM			1/12	HLSR P. No. 27 (1988-8-2-885)
DR. G. P. S. P. No. 27 (1988-8-2-885)			1885/-			02/3	HLSR P. No. 27 (1988-8-2-885)
			1966/-			01/12	HLSR P. No. 27 (1988-8-2-885)
			2047/-			1/12	HLSR P. No. 27 (1988-8-2-885)
			2188/-			1/12	HLSR P. No. 27 (1988-8-2-885)
			2309/-			1/12	HLSR P. No. 27 (1988-8-2-885)
			2450/-			28/4	HLSR P. No. 27 (1988-8-2-885)
			2531/-			1/12	HLSR P. No. 27 (1988-8-2-885)
			2700/-			1/12	HLSR P. No. 27 (1988-8-2-885)
			2850/-			1/12	HLSR P. No. 27 (1988-8-2-885)
			3000/-			1/12	HLSR P. No. 27 (1988-8-2-885)

33

24

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
<i>[Signature]</i> S.D.E.O. (F)							
<i>[Signature]</i>	31/5/94	Scale	<i>[Signature]</i>				01/12/94 to 30/11/96
<i>[Signature]</i>	30/11/95	Prob.	<i>[Signature]</i>				<i>[Signature]</i> S.D.E.O. (F) Haripur
<i>[Signature]</i>	30/11/96	Annual	<i>[Signature]</i>				
<i>[Signature]</i>	30/11/96	Exam allowed	<i>[Signature]</i>				
<i>[Signature]</i>	30/11/96	Annual	<i>[Signature]</i>				
<i>[Signature]</i>	30/11/97	Annual	<i>[Signature]</i>				12/1/96 to 30/11/99
<i>[Signature]</i>	30/11/98	Annual	<i>[Signature]</i>				<i>[Signature]</i> S.D.E.O. (F) Haripur
<i>[Signature]</i>	30/11/99	Annual	<i>[Signature]</i>				
<i>[Signature]</i>	27/4/2000	Allowed three advance months	<i>[Signature]</i>				Allowed three advance months on the of passing BA Exam on 28-4-2000
<i>[Signature]</i>	30/11/01	Scale	<i>[Signature]</i>				vide P.O. No: 1529 dated 17-7-2000
<i>[Signature]</i>	30/11/03	Annual	<i>[Signature]</i>				<i>[Signature]</i>

*[Signature]*  
S. D. E. O. (F)  
Haripur









300

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. 371 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
<b>REVERSED ENTRIES</b>							
		Allowing 3rd class to 4th class...	750	✓		5/10/65	
		750	750	✓		1/1/65	
		751	751	✓		1/1/65	
		812	812	✓		1/1/65	
		592/25-7 (1075-6) - (1875)	1075	✓		1/1/61	
			1325	✓		1/1/61	
			1395	✓		1/1/62	
			1655	✓		1/1/65	
		47/20-7 (1270-8) - (2075)	1270	✓		1/1/61	
			2047	✓		1/1/62	
			2178	✓		1/1/62	
			2290	✓		2/1/66	
			2337	✓		1/1/64	
			2352	✓		1/1/64	
			2357	✓		1/1/64	
			2614	✓		1/1/66	
			2695	✓		1/1/67	
		722-4-20 2575-5 (1575-57) - (2600)	2600	✓		12/2/68	
			2772	✓		1/1/68	
			2866	✓		1/1/61	
			4140	✓		1/1/61	
			4260	✓		1/1/61	
			4380	✓		1/1/61	

Signature of  
 Government  
 Servant  
 Date

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER(FEMALE) HARIPUR.

GRANT OF LEAVE.

As approved by the competent authority, Sanction is hereby accorded to the grant of leave in respect of the PST mistress for the period/Schools & /nature of leave as due as admissible under the Revised leave rules -1981 are given below:-

S.No.	Name of mistress/School	Period of leave	Nature of leave	Remarks .
1.	Nazma Shaheen PST GGPS, KTS-3	19-2-14 to 12-3-14(22-days)	Ex-Pak;leave.	22-days on full pay 250052
2.	Haseena Shaheen PST GGPS, Chooar Shareef	15-2-14 to 15-5-14(90-days)	Maternity leave	90-days on full pay. 252258
3.	Rukhsana Bibi PST GGPS No.1 S/Saleh	21-2-14 to 28-2-14(08-days)	Earned leave	08-days on full pay. 252668
4.	Zrmina Bibi PST GGPS Qutba Dhakj	24-2-2014 to 24-5-2014(90-days)	Maternity leave	90-days on full pay. 357102
5.	Tilat Nageen PST GGPS, Trar (Jab).	20-2-14 to 20-5-14(90-days)	Earned leave.	90-days on full pay. 252460

Note:- Necessary entry to this effect should be made in their Service Books & etc.

Sd/-  
District Education Officer  
Female Haripur.

Endst:No. 3414-161

Dated Haripur the 21-02 /2014.

Copy for information & necessary action to S:-

1. The District Education Officer(F) Haripur.
2. The District A/Cs Officer Haripur.
3. O.O.file.

*Attended to be true*  
*[Signature]*  
Sub Divisional Education Officer  
Female Haripur..



42

~~42~~

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
							544
							27/11/06
							18/11/06
							10/07/07
							21/07/08
							21/14/11

Attested so be

True

*[Signature]*

Bank of Govt over Jm B-8 to B-8 on 1-12-2008 velle @ 20/1/2010

*[Signature]*  
Elementary & Secondary Education Karipur

(98)

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. 371 C. S. B.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature of Government servant
	RS-7	(2230-120-580)	4740	4500			
	RS-7	(2533-100-675)	5485	5215			
			5835	5355			
			5925	5485			
	RS-7	(2740-160-7740)	6260	6300			
			6780	6460			
			7010	6490			
	RS-12	(835-270-12635)	8355	7765			
			8635	8075			
			8905	8385			

8075/12

No. FD-208  
 Pay Scale of Rs. 2008  
 Pay Ver. 1st Dec 2008  
 with next increment on

Pay SVW

FST/CHRS Nariupa  
Muzipala

Rs. 2528/- P.M.

01/12/2010

48

29

9	10	11	12	13		14	15	
				Leave				
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Period	Government to which debitable		
							<p>170</p> <p>5/3/2010</p>	
							<p>11/3/2010</p> <p>21.0</p> <p>7.2/2010</p>	
							<p>Dr. M.A.D.</p> <p>1/12/07</p>	
							<p>to be paid to the holder of this post and other posts of this Office.</p>	
							<p>1/12/07</p>	
							<p>30/10/2010</p> <p>to be paid to the holder of this post and other posts of this Office.</p>	
							<p>Dr. M.A.D.</p>	
							<p>Attention to be drawn</p> <p>P. Mada</p>	
							<p>A-10/88</p>	
							<p>P-4/93</p>	
							<p>F-3/98</p>	
							<p>P-4/2000</p>	
	24/11/2010	Transferred to GGPS Khake					<p>01-01-2010</p>	

43

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. 37(1) 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 G673 Khawa Peshawar			Ps.	8583/P24		25/10	
				8595/P24		21/12/2010	
do	Substantive	8152 (7000-500-2400)		8695/		13/10	
do	do			14000/		7/11	
do	do			14507		12/11	
				15000/2		12/12	
		<p>Basis Pay Scales 2011 Office of The Accountant General Khyber Pakhtun Khawa Peshawar Pay fixed in R.G.P.S. 2011</p> <p>of Rs- 2000-500-22000 (12) at Rs- 14000/- (07-2011) With No increment on 12/2011</p> <p>Accounts Officer Pay Fixation Party K. P. Khawa Peshawar</p>					
				15500/2		1/12/2013	
				16000/2		1/12/14	
				12-12 (9055-650-28555)		2/2015	
				20255/2			

46

2

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
S. K.	30/11/2009	S/R	S. K.				25-11-2009
S. K.	12/2/2010	Transfer to D. J. 1025	S. K.				
DDO (F)	30/6/11	S/R	DDO (F)				
DDO (F)	30/11/11	A/1	DDO (F)				
DDO (F)	30/11/12	A/1	SDEO (F) DISTT HARIPUR				
							Service verified w.e.f. 13-01-11 to 30-11-2011 from the acquittance rolls and the other record.
	30/11/13	A/1	SDEO (F) DISTT HARIPUR				
	30/11/14	A/1					Services verified from 01-12-11 to 31-8-12 from the acquittance rolls and other office record.
	30/6/15	S/R	SDEO (F) DISTT HARIPUR				
	30/11/15	A/1					Granted E/Leave w.e.f. 11-9-12 to 25-9-12 on full pay vide 12 DO (F) Distt Haripur vide No. 33048-50/KC dated 29-9-12.
	30/11/16	A/1	SDEO (F) DISTT HARIPUR				
	30/11/16	A/1					

S 277  
14/11/11  
ADJUTANT G 45  
No. 45/12/11 G  
24/5/2011  
District Assistant Registrar  
HARIPUR

affected to be transferred  
D. J. 1025  
man

(47)

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. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
		R-12	11120	800		2-1-20	
			26340			1-7-18	
CCPS			26340			1-12-18	
Jama		B-12	3320	1900		4-12-01	
Handi			31560			1-9-17	
			31560			1-12-17	
PST			31560			12/18	
CCPS						12/18	
Jama Handi						12/18	

46

252258

31

9	10	11	12	13	14	15			
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8		Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government			
SDEO(F) HARIPUR		20/11/16	not due	SDEO(F) HARIPUR		Period: Government to which debitible	Name: [Signature] Leave for the period from 15-2-14 to 15-5-14 (90 days) on SLD as per AEP/ [Signature] No. 3414-16 of 21-2-14	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
SDEO(F) HARIPUR		30/17	S/P	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		19/18	not due	SDEO(F) HARIPUR				SUB-DIVISIONAL EDUCATION OFFICER FEMALE HARIPUR	
SDEO(F) HARIPUR		30/18	A/G	SDEO(F) HARIPUR			Service verified w/c-1/12 to 30/14 from the Acq. Roll and other record of this office.		
SDEO(F) HARIPUR		17/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		18/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		19/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		20/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		21/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		22/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		23/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		24/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		25/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		26/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		27/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		28/20	A/G	SDEO(F) HARIPUR					
SDEO(F) HARIPUR		29/20	A/G	SDEO(F) HARIPUR					

Attested to be true

[Signature]

Compulsory Retirement from Service

13/11/2015

13/11/2015

13/11/2015

13/11/2015

SDEO(F) HARIPUR






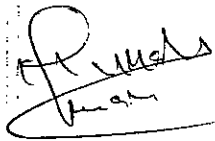
(48)

(52)

23

9	10	11	12	13		14	15	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Period	Government to which debitable		
					<p style="font-size: small;">Reinstated in service, the decision of the Service Tribunal Court from the date of Judgment i.e 19-04-2018 vide D.E.O. H.R. No 10-9259-64 dt. 03-08-2018.</p>			
					<p style="text-align: center;">S 52 4/19/18</p>			
					<p style="font-size: small;">Pay active welf 1-9-18 due to reinstate in service.</p>			
					<p style="font-size: small;">Granted Medical leave welf 02-10-2018 to 15-12-2018 (78 days on full pay) vide D.E.O. H-pur issued under Enclt No. 328-51. Dated 29-01-2018.</p>			
					<p style="text-align: center;">   <b>SDEO(F)</b>  <b>HARIPUR</b> </p>			

Attested to be true

  
 District Registrar

SA Regional Edt. Office  
 (Female) District Registrar



(2)

(3)

25

(For use in Police and other similar Departments).

### RECORD OF POSTINGS.

District and post	No of District Order	Date	District and post	No of District Order	Date

3  
12  
460

Attested  
to by  
[Signature]  
[Date]



FORM III

FORM OF LEAVE ACCOUNT UNDER THE REVISED LEAVE RULES, 1951

Name of the officer/employee: *A. S. ...*  
 Date of commencement of service: *30/10/1951*  
 Date of retirement: *2/10/1958*

Government/Department served under: *...*

From		To		Period	Days		Leave taken		Leave not due		Absence		Balance	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
From		To		Period	Days		Leave taken		Leave not due		Absence		Balance	
16	17	18	19	20	21	22	23	24	25	26	27	28	29	30

From		To		Period	Days		Leave taken		Leave not due		Absence		Balance	
31	32	33	34	35	36	37	38	39	40	41	42	43	44	45

29

299  
 266  
 246  
 214  
 248

ATTESTATION  
*Attested to be true*

Principal District Officer  
 ...  
 24/10/58



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
HARIPUR

**NOTIFICATION**

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Punjab Paktunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11-07-2012, the following Primary School Teacher (Female) PST-B-14 are hereby promoted to the post of Senior Primary School Teachers (Female) SPST-B-14 (8000-610-26300) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further they will be posted later on in the Government Girls Primary Schools in District Haripur by the undersigned against the newly upgraded Senior Primary School Teachers SPST B-14:

تعمیراتی ڈیوٹی کے لئے 03005642594

Total No. of PST (F) Posts duly verified by the DAO	1266
Share of Senior PST (B-14) Posts	402
Net to be Promoted	322
Proposed for promotion	322

S.NO	Seniority NO	NAME OF TEACHER	P/Name	Name of School	D/O Birth	Date of Regularisation on of PST Post	Remarks
1	696	IRSHAD BIBI	MEHBOOB UR REHMAN	ALLOOLI	01-11-1980	21-04-1999	Their further adjustment will be made later on by the undersigned
2	698	MUDASAR BIBI	S.SHAH MOHAMMAD	QUTBA DHAK	06-01-1973	21-04-1999	****Do****
3	699	NAZRA BEGUM	MISKEEN	PATHAN COLONY	23-03-1973	21-04-1999	****Do****
4	700	Sajida Bibi	Bashir Ahmed	Islampur	25-11-1973	21-04-1999	****Do****
5	701	BIBI SALMA	M.WARIS	GANDAF	23-04-1974	21-04-1999	****Do****
6	702	ARZOO SUNDAL	M.ASGHAR	(NA) MIRPUR	20-03-1975	21-04-1999	****Do****
7	703	AMINA BIBI	S.MEHRAM SHAH	JOULIAN	01-01-1976	21-04-1999	****Do****
8	704	RAPIA NAZ	FIDA MOHAMMAD	GAHRA	23-02-1976	21-04-1999	****Do****
9	707	HAJIDA BIBI	HAYAT GUL	GOKARI	01-03-1976	21-04-1999	****Do****
10	708	GULFAM BIBI	M. NAWAZ	KARWALA RAILWAY STATION	10-06-1976	21-04-1999	****Do****
11	710	MELIAHEEN	M.HI.YAS		01-07-1977	21-04-1999	****Do****
12	713	SIHANZADI SHAH BANO	BANARIS KHAN	KTS SECT.4	04-08-1977	21-04-1999	****Do****
13	714	TAJ BIBI	M.SARWAR	JACA MODEL KTS	15-04-1978	22-04-1999	****Do****
14	715	TAHIRA BIBI	M.ASLAM	TALOKER	18-07-1978	22-04-1999	****Do****
15	717	RIZWANA SHAHEEN	HAJI AHMED DIN	JEHMRA	21-02-1973	22-04-1999	****Do****
16	718	RUBINA SHAHEEN	MAHROOF SULTAN	TALOKER	04-01-1974	22-04-1999	****Do****
17	719	SHAKIRA BIBI	M.UMER	KOTEHRA	27-01-1975	22-04-1999	****Do****
18	720	NAZIA BIBI	Faqar Zaman	CHOI	23-02-1975	22-04-1999	****Do****
19	721	NASREEN AKHTAR	ALLAH DETA	NEELAN	03-03-1975	22-04-1999	****Do****
20	723	ATIQA JADOON	M.JAMIL	KAILAGE	07-01-1976	22-04-1999	****Do****
21	724	SHAHREEN AKHTAR	M. SARWAR	KOTLA	11-05-1975	22-04-1999	****Do****
22	725	SHAHIDA BIBI	M.MATI-UR-REHMAN	GALHAM	20-04-1977	22-04-1999	****Do****
23	726	GUL FARAZ BIBI	FUQAR ZAMAN	CHDI	31-01-1978	22-04-1999	****Do****
24	727	NUZHAT BIBI	JHANDAD	Nelar Maira	05-10-1978	22-04-1999	****Do****
25	728	RUKHTAJ BEGUM	ABDUL IQBALIL	KOTIHILA	26-04-1975	22-04-1999	****Do****
26	729	SHAHEEN BEGUM	Avul Shahi	Qudwalian	09-10-1979	22-04-1999	****Do****
27	730	NAZIA PARVEEN	RAFUZ ZAMAN	BARKOT	12-12-1979	22-04-1999	****Do****
28	731	PUKHRAJ	MUSTAKEEM	JOULIAN	25-12-1973	23-04-1999	****Do****
29	732	PARZANA BIBI	ABDUL MAJID	DEHRI KAKOTRI	19-03-1977	23-04-1999	****Do****

MALIK AHILAQ AND UHRAN KHAN

0300-5642594

Handwritten notes and signatures at the bottom of the page, including the date 11-7-2012 and various signatures.

S.No	Serial No	Name of Applicant	Address	Date of Birth	Religion	Category
126	460	RAHAT ALI	RAHAT ALI	17-11-1978	Muslim	SC
127	870	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
128	871	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
129	872	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
130	873	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
131	874	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
132	875	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
133	876	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
134	877	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
135	878	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
136	879	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
137	880	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
138	881	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
139	882	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
140	883	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
141	884	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
142	885	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
143	886	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
144	887	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
145	888	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
146	889	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
147	890	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
148	891	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
149	892	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
150	893	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
151	894	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
152	895	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
153	896	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
154	897	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
155	898	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
156	899	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
157	900	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
158	901	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
159	902	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
160	903	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
161	904	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
162	905	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
163	906	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
164	907	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
165	908	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
166	909	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
167	910	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
168	911	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
169	912	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
170	913	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
171	914	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
172	915	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
173	916	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
174	917	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
175	918	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
176	919	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
177	920	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
178	921	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
179	922	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC
180	923	RAZMA SHAHEEN	RAHAT ALI	01-09-2004	Muslim	SC

MAJLIS AL-UMMAH WA-MAN KHALIFAH

Page No. 4

اپیل بنام: ڈی ای او صاحبہ زلفہ نگار بی اسکول ایف ڈی ایس ایس لاہور

جناب عالیہ!

میں معتمدہ حسینہ شاہین PST بی بی ایس 12 گورنمنٹ گرلز پرائمری سکول اعوان موہڑہ میں اپنے فرائض منصبی سر انجام دے رہی ہوں۔ میری اس وقت 26 سال میں سروس جاری ہے اور میں نے بی اے اور پی ٹی سی کیا ہوا ہے اور مجھے دوسری بار BSP-15 سکیل سے محروم کیا گیا ہے۔ بغیر کسی وجہ کے میرے ساتھ دوسری بار ADO پھر ہالہ سرکل سے سراسر نا انصافی کی ہے۔

Notification No: So (B&A)/1-18/E&SE/2012-11-07-2012

نوٹیفیکیشن نمبر 11-07-2012 کی بی بی ایس 15 سکیل لسٹ میں میرا نام شامل تھا اور مجھے بغیر کسی وجہ کے 15 سکیل سے محروم کیا گیا۔ اور میری سینئرٹی فائل اور سروس بکت کو ADO صاحبہ سرکل پھر ہالہ نے غائب کر دیا تھا اور بڑی مشکل سے اپنی کریڈنٹس سرکل آفس ہری پور سے برآمد ہوئی۔ جو کہ ADO نے میرے بھائی کو Removed کی ہوئی سینئرٹی فائل اور سروس بکت دی۔ جس کی فوٹو کاپی اپیل کے ساتھ لف ہے۔ اس پر ٹکدے لگائی فوٹو نہیں لیا۔

ADO نے مجھ پر جعلی اور فرضی ڈیفالٹر کا کیس بنایا اور مجھ پر بغیر کسی وارننگ اور شو کاز نوٹس کے ایک لاکھ پچاس ہزار جرمانہ ڈلوایا۔ اس میں شامل ڈیفالٹر سجدیہ محفوظ جس کا سیریل نمبر 140 اور سینئرٹی نمبر 888 ہے اس کو 11-07-2012 کو سکیل سے نوازا ہے۔ میری بار بار اپیل کرنے کے باوجود بھی مجھے سکیل سے محروم رکھا گیا۔ ثبوت کے طور پر فوٹو کاپی لف کر رہی ہوں۔ ADO نے اپنے عہدے کا ناجائز استعمال کرتے ہوئے ADO میں روایتی ڈیفالٹر کا عرصہ بھی اپنی سروس میں شامل کر کے مجھے پر 2010 کا جعلی کیس ڈالا۔

میں نے ڈائریکٹر ایجوکیشن پشاور میں اپنے 15 سکیل کے لئے اپیل جمع کروائی تھی اور ساتھ ہی DEO صاحبہ کے دفتر میں اپیل جمع کروائی تھی جس پر تاحال ابھی تک کوئی کارروائی نہیں ہوئی۔ فوٹو کاپی ساتھ لف ہے۔

جناب عالیہ! دوسری بار بغیر کسی وجہ کے 15 سکیل سے محروم کیا گیا ہے۔ میرا ڈفر کا کیس تھا۔ میری پہلے سے ہی سینئرٹی فائل اور سروس بکت کٹیل کی ہوئی ٹھیک صاحبان کے پاس موجود تھی۔

جسے ADO پھر ہالہ سرکل منظور کیا ہوا تھا۔ Notification No: 5729-34 Dated: 13-11-2014 کے مطابق میرا نام سینئرٹی لسٹ میں شامل کیا گیا۔

میرا سینئرٹی نمبر 346 اور سیریل نمبر 322 ہے اور میرا ڈفر کا کیس تھا۔ مجھے ADO پھر ہالہ سرکل نے جان بوجھ کر دوسری بار 15 سکیل سے محروم کیا۔ میری اس وقت 26 سالہ سروس ہے۔ اور میں B.A ہوں اور ساتھ PTC ہوں جناب عالیہ میری کن و جو بات کی بنا پر مجھ کو میرے حق سے محروم کیا گیا۔ اور اس سلسلے میں ADO پھر ہالہ سرکل انکوائری کی جائے کہ اس میں میری سروس بکت اور سینئرٹی فائل کو CPC کے وقت کیوں نہیں پیش کیا۔

آپ سے گزارش ہے کہ سالکہ کے ساتھ انصاف کیا جائے جو کہ سالکہ قانونی طور پر حقدار ہے۔ اس کرم نوازی کے لئے سالکہ تاحیات آپ کی عزت و اقبال باندی کے لئے دعا گو رہے گی۔

اور

جناب معتمدہ

حسینہ شاہین

PST بی بی ایس 12

گورنمنٹ گرلز پرائمری سکول اعوان موہڑہ

Hussain Shahreen

Date: 8/12/2014

Received

M. J. Khan

10/12

14

Attested to be

true

Officially



حکومت خزانہ پیش کشی - اس - او - ہذا کے ساتھ ساتھ سارا سیکول اینڈ ٹریڈنگ کمپنی

حصہ چالیس

فقوہ ماہہ گزارش ہے کہ آپ نے میرا بینڈ میں سیکول (15) میں سیکول پر لکھا تھا اور اب  
میں سیکول پر مجھے آپ کے بارے میں جاننے کے لیے آپ کو Defaulters سے مدد چاہتا ہوں  
دلبر محمد محفوظ کو پتہ 27-2-2013 کو BPS (14) سے لگاوا گیا ہے اور اس کے ساتھ ساتھ (SSC) سے  
اس دوران میں اس کے خلاف 2013-4-16 کو آپ کے اسٹیکل کے ذریعے درخواست بھی کرائی تھی اور جس  
پر تاحال اب تک عمل درآمد نہیں کیا گیا اور میں سے مدد چاہتا ہوں کہ اسٹیکل کے ذریعے اس کے  
اب میں ایک صورت میں سیکول کو اس کے ساتھ ساتھ لگاوا گیا ہے اور اس کے ساتھ ساتھ (2013-4-16)  
حکم کر دیں کہ اس صورت میں سیکول کو اس کے ساتھ ساتھ لگاوا گیا ہے اور اس کے ساتھ ساتھ

سب سے اہم بات یہ ہے کہ میری سرور میں بائو سٹیفن اور میں نے لگاوا گیا ہے اور اس کے ساتھ ساتھ  
یہ کہ میں نے اسٹیکل کو لگاوا گیا ہے اور میں نے لگاوا گیا ہے اور اس کے ساتھ ساتھ  
سٹیفن کے ساتھ ساتھ لگاوا گیا ہے اور میں نے لگاوا گیا ہے اور اس کے ساتھ ساتھ  
سرور میں لگاوا گیا ہے اور میں نے لگاوا گیا ہے اور اس کے ساتھ ساتھ  
ذمہ دار ہوں گا۔  
لینڈ اینڈ کے ساتھ ساتھ لگاوا گیا ہے اور میں نے لگاوا گیا ہے اور اس کے ساتھ ساتھ

Attested to be true  
[Signature]  
شکرہ  
میں گزارش ہوگی  
احسان  
[Signature]  
28/8/2013

ٹائٹل صفحہ چہینہ سندس PST کو ریفٹ گزرنے پر لکھی سکول اعلان مورخہ 0  
مورخہ 28-8-2013

13302-1220561-0

BPS12 014

13302-1220561-0

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0312-4888104

Checked 20/11/2014

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No. SO(Complaint)E&SED/KPK/1-7/2014/N. Moalma Haseena Shahcen  
Dated Peshawar the December 15<sup>th</sup>, 2014

To

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

Subject: - APPLICATION/COMPLAINT

I am directed to refer to the subject noted above and to enclose herewith an application/complaint alongwith its enclosure received from Naib Muallama Haseena Shahcen-PST (BPS - 12) GGPS, Awaan Mouhra, Tehsil & District Haripur addressed to the Secretary E&SE, Khyber Pakhtunkhwa, Peshawar for further necessary action under intimation to this office.

Encs. Above:

(NASRULLAH)  
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:

Copy of the above is forwarded to the:-

Mr. Mukkaram Khan, Deputy Chairman, Chief Minister's Complaint & Redressal Cell, Chief Minister's Secretariat, Khyber Pakhtunkhwa, Peshawar w/r to his letter referred to above.

SECTION OFFICER (COMPLAINT)

Attended  
to be  
done

644  
21/1/2015

Handwritten notes in Urdu

Sup/ADO  
PR reported

# BIO-DATA

1. Name Haseena Shaheen
2. Father's Name Raja Fagis Muhammad Khan
3. Post PST School Govt. PS Awan Mahra
4. Academic Qualification B.A.
5. In case of B.Sc (Subjects) \_\_\_\_\_
6. Division in BA/B.Sc 3rd Division
7. Professional Qualification (Training received) \_\_\_\_\_

Serial No	Description	Institute	Period
1.	PTC	Education Dept	1991-92
2.	_____	Peshawar	_____

8. Date of Birth 3<sup>rd</sup> APRIL 1968

9. Date of first joining the service and the Post in which joined 30-10-1988

10. Record of Appointment:-

S.No	Post held	BPS	Whether on	Period	
				From	To
(1)	PST		regular/adhoc basis		
(1)	PST	7	Regular	30-10-1988	2-05-1990
(2)	PST	12	"	01-07-07	1-07-2010
(3)	PST	12	Regular	25-11-2010	Present

11. Total service years 24 months 2 days. 3

12. Total service on the present post years 24 months 2 days. 3

13. Detail of Non qualifying Service if any, Nil

Signature Haseena Shaheen

ADO /Principal /Headmaster

DY:DO/DO

A. E. C.  
 Headmistress  
 Govt. Girls Primary School  
 Awan Mahra  
 Countersigned by EDO

22/10/13

Attested  
to be true  
Principal  
Awan

# BIO-DATA

1. Name Haseena Shaheen
2. Father's Name Raja Faqir Muhammad Khan
3. Post PST School Govt Girls Awar Mahara
4. Academic Qualification B.A
5. In case of B.Sc (Subjects) \_\_\_\_\_
6. Division in BA/B.Sc 3<sup>rd</sup> Division
7. Professional Qualification (Training received) \_\_\_\_\_

Serial No	Description	Institute	Period
1.	PTC	Education Dep	1991-92
2.		Peshawar	

8. Date of Birth 3<sup>rd</sup> APRIL 1968

9. Date of first joining the service and the Post in which joined 30-10-1988

10. Record of Appointment:-

S.No	Post held	BPS	Whether on	Period	
				From	To
(1)	PST		regular/adhoc basis		
(1)	PST	7	Regular	30-10-1988	2-05-1990
(2)	PST	12	//	01-07-07	1-07-2010
(3)	PST	12	Regular	25-11-2010	Pte. Sent..

11. Total service years 24 months 2 days. 3

12. Total service on the present post years 24 months 2 days. 3

13. Detail of Non qualifying Service if any, NIL

Signature Haseena Shaheen

ADO /Principal /Headmaster

[Signature]  
DY:DO/DO

[Signature]

[Signature]  
Headmaster  
Govt. Girls Primary School  
Awar, Mohra  
Countersigned by EDO

22/10/13

Attested to be

True

[Signature]



(59)

**OFFICE OF THE DEPUTY DISTRICT OFFICER (FEMALE)  
ELEMENTARY & SECONDARY EDUCATION HARIPUR**

SYNOPSIS OF ACR'S IN RESPECT OF MST: Miss Haseena Shaheen

DATE OF BIRTH 3-4-1968

D/O FIRST APPOINTMENT AS 30-10-1988

SENIORITY NO. \_\_\_\_\_

DOMICILE Abbottabad

S.NO.	YEARS	GRADING	PIN PICTURE	ADVERSE	EXPUNGE	REMARKS
1	2012-2012	100%	Very Good	Nil	Nil	Nil
2	2010-2010	100%	Very Good	Nil	Nil	Nil
3	2007-2007	86%	Very Good	Nil	Nil	Nil
4	2006-2006	87%	Very Good	Nil	Nil	Nil
5	2011-2011	98%	Very Good	Nil	Nil	Nil

Y. Z. Q.  
22/10/13

Deputy District Officer (F)  
Elementary & Secondary Education  
Haripur

M. R. Q.  
Head Mistress  
Govt. Girls Primary School  
Abbottabad

Attested to  
be true  
M. R. Q.

60

(R)

**NON INVOLVEMENT CERTIFICATE**

It is certify that Mrs / Mr. Harjeena Sheher Post PST Station Awan Mohra

Has no involve any disciplinary / departmental / proceeding / anticorruption / judicial enquiry is pending against them nor as any penalty been imposed upon any one of them during the last five years.

*[Handwritten signature]*

22/10/13

Deputy District Officer  
S&L Haripur

*[Handwritten signature]*  
Head Mistress  
Govt Girls Primary School  
Haripur

C/S EDO ESSE  
Haripur

Accepted to  
be true

*[Handwritten signature]*



(61)

OFFICE OF THE DEPUTY DISTRICT OFFICER (FEMALE)  
ELEMENTARY & SECONDARY EDUCATION HARIPUR

THREE YEARS RESULTS IN RESPECT OF MST, Haseena Shabeen D/o  
Raja Mohammad Faris Khan

S.NO.	YEARS	NAME OF CLASS	RESULT	REMARKS
1	2012-2012	3th	100%	V. Good
2	2010-2010	Nursery <sup>kg1</sup>	100%	V. Good
3	2007-2007	1th	86%	V. Good

Deputy District Officer (F)  
Elementary & Secondary Education  
Haripur

22/10/13

Attested  
to be true

Head of Institution  
Govt. Girls Primary School  
Haripur

*[Signature]*



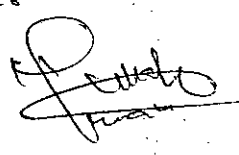
69  
 13302-1220591-0  
 56936M  
 13302-1220591-0  
 20/09/2005  
 31/08/2018  
 03/10/1988  
 Attest

**SERVICE CERTIFICATE**

Certified that MISS Huseena Shaheen D.F  
Raja Faqeer Muhammad Khan has been serving as PGT teacher at  
GGPS/GHS/GMS Alwan Mohra w.e.f 30/10/1988. His  
 work and conduct with the institution is very good.

Assistant  
 District Officer (F)  
 Education Haripur

15/11/13  
 Dy. DISTRICT OFFICER (F)  
 SCHOOLS & LITERACY HARIPUR.

Attested to be  
 true  


**(CONFIDENTIAL REPORT)  
TEACHING STAFF**

**CONFIDENTIAL REPORT FOR THE YEAR ENDING 31<sup>st</sup> DECEMBER 2009**

1. Name Hilpana Shaban P.T.
2. Father's Name Capt. Faris Mohammad Khan
3. Qualifications P.T. B.A.
4. Total Service on 31<sup>st</sup> December 24 years and month 3 and day 12
5. Scale of Pay and Present pay (Running Basic) 12 Pay Scale and 14508/-
6. Various posts held during the years with period PST
7. Period of report (PST) 01-01-2009 to 31-12-2009

**PARTICULARS REMARKS ON:-**

1. Judgments and sense of proportion V Good
2. Initiative and drive Good
3. Technical knowledge and application V Good
4. Supervision and control over students V Good
5. Integrity Honest and hard working
6. Co-Operation with Staff Cooperative
7. Relation with public Good
8. Suitability for promotion Fit for promotion
9. Knowledge of language Good level - Hindi, English, Punjabi
10. Casual leaves 17
11. Results (Annual) 100%

General Remarks by the High Officer

*She is hardworking.*

Name in block letter and

APRIL AIRBN

Designation of the report officer (with seal)

Assistant District Officer (F)  
District Officer (F)  
3/2/09

*Checked  
to be true  
15/1/11*

Prepared by Saeed

(63)

(64)

بخدمت جنابہ ڈی ای او صاحبہ زنانہ مدارس سکول اینڈ لیٹریسی ضلع ہری پور

جنابہ عالیہ!

موزبانہ گزارش ہے کہ میں معلمہ حسینہ شاہین PST BPS-12 گورنمنٹ گرلز پرائمری سکول پانڈک میں اپنے فرائض منصبی سرانجام دے رہی ہوں۔ جنابہ اہج مورخہ 05-10-2021 صبح 8:30 اور 09:00 بجے کے درمیان SDEO صاحبہ نے سکول کا وزٹ کیا جہاں پر SDEO صاحبہ نے داخل ہوتے ہی مجھے دھمکی دی کہ میں تمہیں نوکری سے ڈیس کر دوں گی اگر تم نے اس ڈاکو مینٹس پر دستخط نہ کیے میرے پوچھنے پر مجھے دوبارہ دھمکی دی تمہیں نوکری کرنی ہے یا نہیں۔ سٹاف کی ملی بھگت اور SDEO صاحبہ ٹریا تاج کی ذاتی رنجش میرے سامنے دستخط والا توج رکھا گیا اور بغیر پڑھے مجھ سے ڈاکو مینٹس پر بیک ڈیٹ میں دستخط کروائے گئے جبکہ SDEO صاحبہ نے آج مورخہ 05-10-2021 وزٹ کیا ہے جبکہ عملے کی ملی بھگت اور SDEO صاحبہ نے مجھ سے بیک ڈیٹ میں دستخط کروائے۔ سکول کے گیٹ سے نکلنے وقت SDEO صاحبہ نے مجھے کہا میں نے اپنا کام کر دیا ہے میں نے تم سے 15 سکیل کی بجائے 14 سکیل پر دستخط کروالیے۔ اپنے وکیل سے کہو میرا تمہارے وکیل نے جو کچھ کرنا ہے وہ کر لے۔ یہ اس لیے کیا گیا تاکہ میں 15 سکیل و ویک بیٹیفیس نہ لے سکوں اور اس کے ساتھ میرا ایک اور مقدمہ سروس ٹریٹمنٹ میں چل رہا ہے اس کو دبانے کی خاطر یہ ڈرامہ رچایا گیا ہے۔ میری اپ سے التجا ہے کہ مجھے انصاف دلایا جائے اور اس بات پر SDEO صاحبہ اور باقی سٹاف گورنمنٹ گرلز پرائمری سکول پانڈک سے پوچھا جائے۔ میرا وکیل ان پرسن سروس ٹریٹمنٹ میں SDEO صاحبہ ٹریا تاج کو بلوائے گا۔

شکریہ

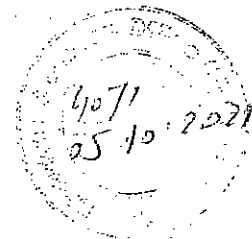
العارضہ

نائب معلمہ شاہین PST-BPS 12  
گورنمنٹ گرلز پرائمری سکول پانڈک ہری پور  
موبائل نمبر: 0310-1580271

مورخہ: 05-10-2021

Huseena Shaheen

Attested to be  
true  
[Signature]



5/20/21

53A

No. 413

For In Stamp Rs. Ps.  
RGL58066213  
uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

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

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Accepted  
to be insured  
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Amroha

GST No. 12-003809-002-73



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CASH 2021-10-26 10:42

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Staff: 50438 Route: X26114

\*\*\*\*\* Sender Details \*\*\*\*\*  
Name : HASEENA SHAHEEN  
Phone : 03101580271  
Address : G G PS PANDAK HARIPUR KPK

\*\*\*\*\* Consignee Details \*\*\*\*\*  
Name : THE DIRECTOR ELEMENTRY  
Phone : 332332323352  
Address : & SECONDRY EDUCATION GOVT OF KPK P  
ESHAWAR

\*\*\*\*\* Package Content \*\*\*\*\*  
DCX  
Insured Value  
Rs. 0

Service CHG	216.0
Other Amount	0.0
VAS	0
Insurance CHG	0
GST	34
Premium	0
<b>TOTAL</b>	<b>250.0</b>

\*\*\*\*\* \*\*\*\*\*

\*\*\*\*\* \*\*\*\*\*

\*\*\*\*\* \*\*\*\*\*

*Attended  
to be true*

*H. M. Khan*

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To

The Secretary/Director Education,  
Govt. of Khyber Pakhtunkhwa, Peshawar.

Sub: Departmental Appeal for promotion from BPS-12 to  
BPS-15 on the basis of eligibility as per seniority list  
with effect from 11-07-2012.

Respected Sir,

The facts giving rise to the instant appeal are as under:-

- (1) That the appellant has been serving in the Education Department as PST since 30-10-1988 in BPS-12 and currently she is performing the assigned duties in Govt. Girls Primary School Pandak, Tehsil & District Haripur.
- (2) That the appellant is still performing the duties in BPS-12 inspite of fact that 32 years service tenure has been passed in the Respondent's department, but the Respondents have intentionally and deliberately deprived the appellant from promotion from BPS-12 to BPS-15 due to malafide intention.
- (3) That the appellant was ignored from up-gradation/promotion time and again by the Respondents i.e. in 2012, 2013, 2014 & 2015 which is an ample instance of malafide intention and ulterior motive on the part of Respondents.
- (4) That the appellant is more qualified having qualification of B.A. in her credit and she is also senior in service than the certain PTC teachers, but the Respondents paid no intention towards these facts and deprived the appellant from her genuine and lawful right.
- (5) That the name of the appellant properly existed on the merit list of BPS-15 vide Notification No. So (B&A)/1-18/E&SE/2012, dated 11-07-2012, but the Respondent No. 3/ADO Circle Pharhala intentionally and deliberately set aside/concealed the seniority file and service book of the appellant merely to deprive her from promotion and the Respondent's department took no action on this illegal and unlawful

Attested to  
be true  
*[Signature]*

act of Respondent No. 3/ADO Circle Pharhala, Haripur.

(6) That Respondent No. 3/ADO Circle Pharhala made a concocted and fabricated case against the appellant and without issuing any warning letter or show cause notice imposed penalty Rs. 50,000/-.

It is pertinent to mention here that another PST, who was declared defaulter had been awarded the requisite scale on 11-07-2012, and both PST teachers were acquitted from the charge levelled against them inspite of that fact the appellant has been deprived intentionally. Inspite of repeated appeals of the appellant, she was kept derived from promotion which is sheer violation of law and colourful exercise of powers on the part of Respondents.

(7) That the appellant preferred departmental appeals to Respondents No. 2 & 3 for her up-gradation/promotion, but she received no fruitful result as yet.

(8) That Deputy District Officer (F) Elementary & Secondary Education, Haripur recorded the remarks on Synopsis of ACR's of appellant that her work and conduct is very good and gave no adverse remarks against the appellant which is an ample instant of good performance of assigned duties. Moreover, the Deputy District Officer (F) Elementary & Secondary Education Haripur also issued Non Involvement Certificate to the appellant. The same Officer again issued 03 years result report showing good result/progress of the appellant. Another Service Certificate issued by same officer also clears the work and good conduct of the appellant. The Assistant District Officer, Azra Afridi also submitted confidential report stating therein "Fit for Promotion.




It is therefore, requested that the appellant may please be promoted from BPS-12 to BPS-15 on the basis of eligibility as per seniority list with effect from 11-07-2012.

Dated: 26/10/2021


Huseena Shahreen  
Appellant  
(Mrs. Haseena Shahreen)  
PST, GPS, Pandak, Haripur.

Attested to  
be true

*[Signature]*

102405			
ایڈویکٹ: <u>سید ابرار احمد صاحبی کورٹ</u>	پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <u>2146-10-10</u>			
رابطہ نمبر: <u>03129872865</u>			

بعدالت جناب: سید ابرار احمد صاحبی کورٹ

	دعوی:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

**باعت تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام ایڈووکیٹ ابرار احمد کیلئے سید ابرار احمد کو دوکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا تاؤ گری یا طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل گرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا اجزوی کارروائی کے واسطے اور وکیل یا مختار کوئی کو اپنے لئے یا اپنے لئے لقمہ لقمہ اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائزہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا ذرا کالت نامہ لکھ دیا تاکہ سند رہے

الرقوم: 27/09/2022

العبد سید ابرار احمد العبد

مقام ایڈووکیٹ ابرار احمد کے لیے منظور ہے۔

سید شہناز بیگم فوٹو فیکچر  
سائنڈ مائٹرنائٹ فیکس و منیجر ایجوکیشن  
نوٹ: اس دکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Husna Shaheen