

16-8-22

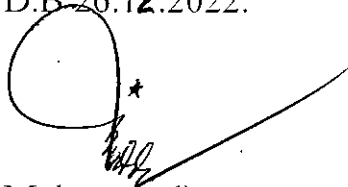
Due to summer vacation the case is adjourned to 18-10-22 for the hearing.



18.10.2022

Nemo for the appellant. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Previous date was changed on Reader note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments before the D.B. 26.12.2022.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)


18


16.03.2022 Due to retirement of the Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same before on 18.05.2022


Reader

18.05 2022 Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Last opportunity given. To come up arguments before this D.B on 13.06.2022 at camp court Abbottabad.



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

13.06.2022 Counsel for the appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present.

Due to paucity of time, arguments in the instant case could not be heard. Adjourned. To come for arguments on 16/18/2022 before D.B at Camp Court, Abbottabad.


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


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

14.06.2021

Due to cancellation of tour, Bench is not available. Therefore, case is adjourned to 28.09.2021 for the same as before.

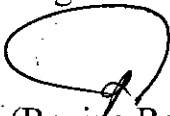

Reader


28.09.2021

Nemo for appellant.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present.

Preceding date was adjourned on a Reader's note, therefore, appellant/counsel be put on notice for 21.12.2021 for arguments before D.B at Camp Court, Abbottabad.



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

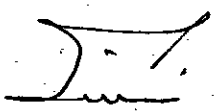

Chairman
Camp Court, A/Abad

21.12.2021

Clerk of learned counsel for the appellant present. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned. To come up for arguments on 16.03.2022 before the D:B at Camp Court Abbottabad.


(Mian Muhammad)
Member (E)
Camp Court A/Abad


(Salah-ud-Din)
Member (J)
Camp Court A/Abad

20.02.2020

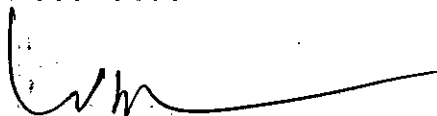
Due to COVID-19, the case is adjourned for the same on 08.02.2021.


READER

18.02.2021 Counsel for appellant present.

Noor Zaman Khattak learned District Attorney for respondents present.

Former made a request for adjournment. Adjourned. To come up for arguments on 14.06.2021 before D.B at Camp Court, Abbottabad.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad



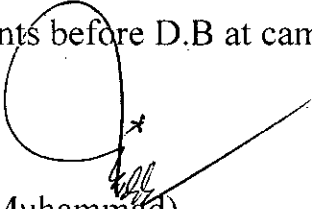
(Rozina Rehman)
Member(J)
Camp Court, A/Abad

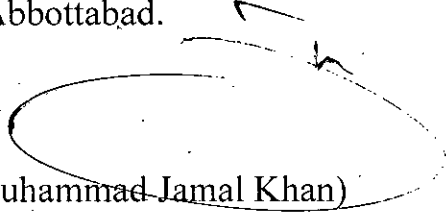
17.11.2020

Counsel for the appellant is present. Mr. Muhammad Riaz Khan Pindakhel, Assistant Advocate General alongwith Mr. Sohail Ahmad Zeb, Assistant Litigation for respondents is present.

Learned counsel for the appellant requests for adjournment on the ground that he has not prepared the brief.

Adjourned to 20.01.2021 on which date to come up for arguments before D.B at camp court Abbottabad.


(Mian Muhammad)
Member(E)


(Muhammad Jamal Khan)
Member(J)
Camp Court Abbottabad

18.12.2019

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 17.02.2019 for arguments before D.B at Camp Court Abbottabad.



(Hussain Shah)
Member
Camp Court Abbottabad

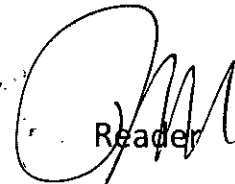


(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

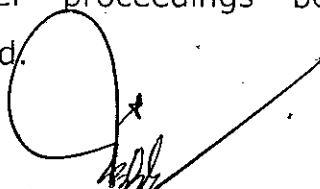
Due to summer vacation case to come up for the same on 11/4
9 / 20 at camp court abbottabad.



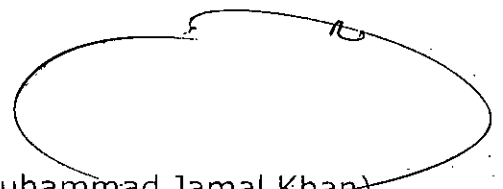
Reader

14.09.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Sohail Ahmad Zeb, Assistant Litigation are also present. According to the appellant his counsel is engaged in other courts and could not attend the Tribunal today and requested for adjournment. Adjourned to 17.11.2020. File to come up for further proceedings before D.B at Camp Court, Abbottabad.



(Mian Muhammad)
Member (Executive)
Camp Court Abbottabad




(Muhammad Jamal Khan)
Member (Judicial)
Camp Court Abbottabad

Service Appeal No. 58/2019


11.07.2019


Counsel for the appellant and Mr. Saqib Shehzad, Assistant alongwith Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Representative of the department submitted written reply on behalf of respondents No. 1 to 3. Case to come up for rejoinder and arguments on 17.09.2019 before D.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

17.09.2019

Learned counsel for the appellant present. Mr. Muhammad Bilal learned Deputy District Attorney alongwith Mr. Sohail Ahmed Zeb Litigation Officer for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for rejoinder and arguments on 19.11.2019 before D.B

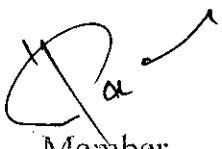

(Hussain Shah)
Member
Camp Court Abbottabad


(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

19.11.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Sohail Ahmad Zeb, Assistant for respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 18.12.2019 before D.B at Camp Court, Abbottabad.


Member



Member
Camp Court Abbottabad


22.03.2019

Appellant present. Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Ex-PST) has filed the present service u/s 4 of Khyber Pakhtunkhwa Service Tribunal Act 974 against the order dated 27.09.2018 whereby major penalty of compulsory retirement from service was imposed upon the appellant.


Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 17.06.2019 before S.B at Camp Court A/Abad.


Appellant Deposited
Security & Process Fee


Member
Camp Court A/Abad

17.06.2019



Counsel for the appellant and Mr. Muhammad Bilal, DDA alongwith Mr. Sohail Ahmad Zeb, Assistant Litigation for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 11.07.2019 before S.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 58/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/1/2019	<p>The appeal of Mr. Muhammad Hafeez received today by post through Mr. Hamayun Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 14/1/19</p>
2-	25-1-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>22-3-19</u>.</p> <p> CHAIRMAN</p>

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

Appeal No. 58 /2019

Muhammad Hafeez son of Akram, Ex-PST, Teacher, Resident of Khan Khurd Cum Bakot Tehsil and District, Abbottabad.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL

INDEX

S. #	Description	Page #	Annexures
1.	Memo of Appeal alongwith affidavit	1 to 09	
2.	Copy of attendance register	10-20	"A" A-1
3.	Copy of application	21	"B"
4.	Copies of application	22-24	"C"
5.	Copy of show cause notice	25-30	"D" D-1
6.	Copy of appeal	31-37	"E"
7.	Copy of judgment dated 23/11/2017	38-41	"F"
8.	Copy of petition	42-43	"G"
9.	Copy of order and charge report	44-45	"H"
10.	Copy of charge sheet and reply	46-51	"I"
11.	Copy of show cause notice and reply	52-55	"J"
12.	Copy of impugned order	56	"K"
13.	Copy of appeal	57-60	"L"
14.	Wakalatnama		

...APPELLANT

Dated: 4-Jan /2019

Through

(HAMAYUN KHAN)
Advocate High Court, Abbottabad

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

Appeal No. 58 /2019

Muhammad Hafeez son of Akram, Ex-PST Teacher, Resident of Khan Khurd Cum Bakot Tehsil and District, Abbottabad.

...APPELLANT

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 58

Dated 14-01-2019

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Abbottabad

...RESPONDENTS

Filed to-day

Registrar

14/1/19

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST IMPUGNED ORDER DATED 27/09/2018 PASSED BY RESPONDENT NO. 3 WHEREBY. APPELLANT WAS COMPULSORY RETIRED FROM SERVICE, WHICH IS ILLEGAL, AGAINST THE LAW, FACTS AND LIABLE TO BE SET ASIDE.

PRAAYER: ON ACCEPTANCE OF INSTANT APPEAL IMPUGNED ORDER DATED 27/09/2018 PASSED BY RESPONDENT NO. 3 MAY KINDLY BE DECLARED NULL AND VOID, AND APPELLANT BE RE-INSTEAD IN SERVICE WITH ALL BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM FIT AND PROPER IN THE INTEREST OF JUSTICE.

=====

Respectfully Sheweth;-

Appellant beg to solicit through this appeal on the following legal and factual back grounds;-

1. That appellant was appointed on 03/08/1984 as PST/ PTC Teacher in Education department.
2. That thereafter appellant joined service and continuously performed duty in different schools of District Abbottabad, with full devotion and liabilities till 24/05/2016. Copy of attendance register is annexed as annexure "A".

3. That on 18/08/2015 A.D.O Circle on surprise visit to the school signed so called retirement order from appellant on the basis of political interference. Copy of application is annexed as Annexure "A"¹
4. That on 19/08/2016 appellant filed application before respondent No. 3 and stated all actual position of the incident. Copy of application is annexed as Annexure "B".
5. That therefore, on 04/11/2015 and on 05/11/2015 appellant filed application before respondent No. 1 & 2 respectively. Copies of application is annexed as Annexure "C".
6. That when respondent No. 3 failed to achieved is unlawful purpose, on 14/01/2016 respondent No.3 issued show cause notice to appellant with allegation of absence from duty and on 26/01/2016 appellant filed reply

of the same. Copy of show cause notice is annexed as Annexure "D".

7. That on 24/05/2016 respondent No. 3 issued so called impugned. Copy of order is annexed as Annexure "D".¹
8. That on 06/06/2016 appellant filed department at appeal before the respondent No. 2 against the impugned order dated 24/05/2016 passed by respondent No. 3 and similarly on 30/09/2016 filed appeal No. 1025/2016 before this tribunal. Copy of appeal is annexed as Annexure "E".
9. That on 23/11/2017 after hearing of argument this tribunal accepted appeal of appellant with all back benefits. Copy of judgment dated 23/11/2017 is annexed as Annexure "F".
10. That thereafter respondent No. 3 refused to implement the judgment dated 23/11/2017 appellant filed implementation petition No.

5/18. Copy of petition is annexed as Annexure "G".

11. That on 14/02/2018 respondent No. 3 issued reinstatement order and on 16/03/2018 appellant assumed change of duty at GPS Saranda Abbottabad. Copy of order and charge report is annexed as Annexure "H".
12. That on 22/02/2018 respondent No. 3 issued charge sheet with some new allegation which was not delivered to appellant and within time and on 05/03/2018 appellant received the same from office of the respondent No. 3 and similarly on the same date 05/03/2018 submitted reply of the charge sheet in the office of respondent No. 3 and on the same day appellant went to the office of inquiry officer at GHS, Havelian for submission of reply but inquiry officer refused to received and lastly on 16/03/2018 appellant send reply of charge sheet through registered post. Copy of charge sheet and reply are annexed as Annexure "I".

13. That on 28/04/2018 respondent No. 3 issued show cause notice to appellant but intentionally not delivered to the appellant and kept in office till 27/08/2018, and on 27/08/2018 when show cause notice received to appellant, applied for record/ inquiry report but respondent No. 3 refused the same and lastly appellant submitted reply of the show cause notice. Copy of show cause notice and reply is annexed as Annexure "J".
14. That finally for achievement of illegal and unlawful purpose respondent No. 3 passed impugned order dated 27/09/2018 on the basis of so called allegation. Copy of impugned order is annexed as Annexure "K".
15. That on 01/10/2018 appellant filed departmental appeal before the respondent No. 2 against the impugned order passed by respondent No. 3. But till date respondent No. 2 not given any response and similarly

not passed any order on the same. Copy of appeal is annexed as annexure "L".

16. That feeling aggrieved with the order passed by respondent No. 3 appellant invoke, the jurisdiction of this Honourable tribunal on the following major point of law.

GROUNDS:-

- a. That impugned order dated 27/09/2018 against the law, facts and circumstances hence liable to be set aside.
- b. That order dated 27/09/2018 passed without personal hearing and legal formalities hence liable to be set aside.
- c. The impugned order passed against the basic principle of Natural Justice there liable to be a set aside.
- d. That at the time of passing impugned order respondent No. 3 ignored all basic and legal requirement of law and law.

- e. That, impugned order against the well known precedents of the superior courts of the country.
- f. That all proceeding were conducted on the direction of local politician for political revenge.
- g. That order dated 27/09/2018 against the fundamental rights of the appellant.
- h. That respondent No. 3 not considered different application and replies filed by the appellant for bringing actual facts and personal revenge of the A.D.O namely Muneeb Abbasi and other official of the respondent No. 3 establishments. Hence order dated 27/09/2018 is liable to be set aside.
- i. That respondent No. 3 issued impugned order on the recommendation A.D.O through which they deprived appellant from his basic rights of further service,

hence order dated 27/09/2018 is liable to be set aside.

- j. That others points would be urged at the time of argument with the kind permission of this Honourable Tribunal.

It is therefore, humbly prayed that on acceptance of instant appeal impugned order dated 27/09/2018 passed by respondent No. 3 may kindly be declared null and void, and appellant be re-instated in service with all back benefits. Any other relief which this Honourable Tribunal deem fit and proper in the interest of justice.


...APPELLANT

Through

Dated: 4 Jan /2019


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

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


...APPELLANT

رجسٹرڈ ماضی تدبیرین G.M.P.S سنٹر کراچی

نام: محمد حیدر
 پتہ: بیت ماہ اکتوبر 2025
 شمارہ: (محلہ)

تاریخ آمد	دستخط روزانگی	دستخط آمد	دستخط روزانگی	دستخط آمد	دستخط روزانگی	دستخط آمد	دستخط روزانگی	دستخط آمد	دستخط روزانگی
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29	1-35	1-35	1-35	1-35	1-35	1-35	1-35	1-35	1-35
30	1-35	1-35	1-35	1-35	1-35	1-35	1-35	1-35	1-35

قسمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقہ									
استحقاق									
پہاری									
میزان									

دستخط پیدائش

محمد حیدر

بیمبر حاضر فی تدبیرین GMP'S منتقل کردن

۱۹۰۰

۲۰۷۵

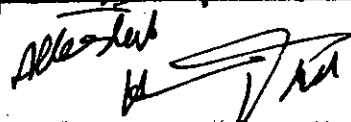
بابت ماه فروردین

شماره اول سند

تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
۱	انوار											
۲	۳۵	۱۱/۱۲	۱۱/۱۲	۳۵								
۳	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۴	۳۵	۱۱/۱۲	۱۱/۱۲	۳۵								
۵	۱-۳۵	۱۱/۱۲	۱۱/۱۲	۱-۳۵								
۶	۱۲	۱۱/۱۲	۱۱/۱۲	۱۲								
۷	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۸	انوار											
۹	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۱۰	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۱۱	۱-۳۵	۱۱/۱۲	۱۱/۱۲	۱-۳۵								
۱۲	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۱۳	۳۵	۱۱/۱۲	۱۱/۱۲	۳۵								
۱۴	۱۳۳	۱۱/۱۲	۱۱/۱۲	۱۳۳								
۱۵	انوار											
۱۶	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۱۷	۳۵	۱۱/۱۲	۱۱/۱۲	۳۵								
۱۸	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۱۹	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۰	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۱	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۲	انوار											
۲۳	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۴	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۵	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۶	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۷	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۸	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۲۹	انوار											
۳۰	۱۳۵	۱۱/۱۲	۱۱/۱۲	۱۳۵								
۳۱												

تیمت	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان
اتفاقیه									
استحقاقی									
بیماری									
میزان کل									

دستخط پیدمانش

دستخط


رجسٹر حاضری مدرسین GMP5 سنٹر کورٹ

نام: محمد حفیظ بایتاہ رجسٹر 2075

19

تاریخ	آمد	دستخط روزگی	دستخط آمد	دستخط روزگی	دستخط آمد	دستخط روزگی	دستخط آمد	دستخط روزگی	دستخط آمد
1	135	144	144	135	144	144	135	144	144
2	135	144	144	135	144	144	135	144	144
3	135	144	144	135	144	144	135	144	144
4	135	144	144	135	144	144	135	144	144
5	135	144	144	135	144	144	135	144	144
(4) انصر									
6	135	144	144	135	144	144	135	144	144
7	135	144	144	135	144	144	135	144	144
8	135	144	144	135	144	144	135	144	144
9	135	144	144	135	144	144	135	144	144
10	135	144	144	135	144	144	135	144	144
11	135	144	144	135	144	144	135	144	144
12	135	144	144	135	144	144	135	144	144
(5) انصر									
13	135	144	144	135	144	144	135	144	144
14	135	144	144	135	144	144	135	144	144
15	135	144	144	135	144	144	135	144	144
16	135	144	144	135	144	144	135	144	144
17	135	144	144	135	144	144	135	144	144
18	135	144	144	135	144	144	135	144	144
19	135	144	144	135	144	144	135	144	144
(6) انصر									
20	135	144	144	135	144	144	135	144	144
21	135	144	144	135	144	144	135	144	144
22	135	144	144	135	144	144	135	144	144
23	135	144	144	135	144	144	135	144	144
24	135	144	144	135	144	144	135	144	144
25	135	144	144	135	144	144	135	144	144
(7) انصر									
26	135	144	144	135	144	144	135	144	144
27	135	144	144	135	144	144	135	144	144
28	135	144	144	135	144	144	135	144	144
29	135	144	144	135	144	144	135	144	144
30	135	144	144	135	144	144	135	144	144
31	135	144	144	135	144	144	135	144	144

26
2016
144

سہ ماہی

تعداد	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان

دستخط پیدائش

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تاریخ	آمد	دستخط روانگی	دستخط آمد	دستخط روانگی	دستخط آمد	دستخط روانگی	دستخط آمد	دستخط روانگی	دستخط آمد	دستخط روانگی
1	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
2	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
3	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
4	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
5	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
6	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
7	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
8	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
9	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
10	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
11	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
12	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
13	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
14	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
15	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
16	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
17	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
18	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
19	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
20	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
21	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
22	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
23	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
24	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
25	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
26	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
27	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
28	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
29	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
30	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135
31	8-20	11/1	135	11/1	11/1	135	11/1	11/1	11/1	135

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

دستخط پیدائش
 [Signature]


حسب حاضری مادر حسین

۱۶

نام خدمتگزار: بیت ماه لعل علی تاریخ: ۱۶ / ۱۰ / ۱۹۷۰

تاریخ	آمد	دستخط روانگی	آمد	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
۱												
۲												
۳												
۴												
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۳۱												

تعداد	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان
تفصیلاً									
استحقاق									
بیماری									
میزان کسب									

دستخط پزشک *Attested* 

رئیس بیمارستانی مدرسین (۱۰)

نام هر صفت بابت ماه ۲۰۰۶
 شماره ۱۹

تاریخ	آمد	دستخط روزی	دستخط	آمد	دستخط روزی	دستخط	آمد	دستخط روزی	دستخط
۱									
۲	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۳	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۴	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۵	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۶	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۷	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۸	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۹	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۰	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۱	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۲	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۳	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۴	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۵	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۶	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۷	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۸	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۱۹	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۰	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۱	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۲	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۳	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۴	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۵	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۶	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۷	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۸	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۲۹	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۳۰	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				
۳۱	۱۲۳۵	۱۱۴	۲۳۰	۱۱۴	۱۲۳۵				

تقسیمات	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان
اتفاقیه									
استحقاقی									
بیماری									
میزان کل									

دستخط پزشک

استاد
 [Signature]

حسبہ حاضری مدرسہ

16

نام سرگودھا بیت ماہ جون

19

شمارہ

تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
1	7.00	11/12	11/12									
2	7.00	11/12	11/12									
3												
4	7.00	11/12	11/12									
5	7.00	11/12	11/12									
6	7.00	11/12	11/12									
7	7.00	11/12	11/12									
8	7.00	11/12	11/12									
9	7.00	11/12	11/12									
10	7.00	11/12	11/12									
11	7.00	11/12	11/12									
12	7.00	11/12	11/12									
13	7.00	11/12	11/12									
14	7.00	11/12	11/12									
15	7.00	11/12	11/12									
16	7.00	11/12	11/12									
17	7.00	11/12	11/12									
18	7.00	11/12	11/12									
19	7.00	11/12	11/12									
20	7.00	11/12	11/12									
21	7.00	11/12	11/12									
22	7.00	11/12	11/12									
23	7.00	11/12	11/12									
24												
25												
26												
27												
28												
29												
30												
31												

دستخط پیدار

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قسمت
اتفاق
استحقاق
بیماری
میزان

National Bank of Pakistan

Account Statement

Account Title(s) MUHAMMAD HAFIZ S/O M.AKRAM

Address: KALLAN
ATD

Postal Code:

Branch Code/Name: 1314 Nathiagali Branch
Region Name: Abbotabad

Statement of Account

Statement Printing Date: 21-Jun-2016

Town:

District:

City: ABBOTABAD

Province/State: KH.PAKHTOON

Country: PAKISTAN

Product Name: PLS Savings Account

Currency: PKR

CIF No: 6605472

Account No: 3082675797


IBAN: PK84NBPA1314003082675797

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Sl. No.	Date	Description	Ref. No.	Type	Debit	Credit	Balance
1	02-Jan-2014	SALARY				31,787.00	31,838.70
2	15-Jan-2014	PROFIT/LOSS	20157	01	0.00	764.00	32,602.70
3	15-Jan-2014	W.H.TAX	20158	01	76.40	0.00	32,526.30
4	20-Jan-2014	CASH	743481	20	32,000.00	0.00	526.30
5	03-Feb-2014	SALARY		03	0.00	29,067.00	29,593.30
6	03-Mar-2014	SALARY		03	0.00	29,067.00	58,660.30
7	21-Mar-2014	CASH	743482	21	58,000.00	0.00	660.30
8	21-Mar-2014	W.H.TAX	18423482	21	174.00	0.00	486.30
9	01-Apr-2014	SALARY		01	0.00	29,067.00	29,553.30
10	04-Apr-2014	CASH	743483	04	29,000.00	0.00	553.30
11	02-May-2014	SALARY		02	0.00	31,787.00	32,340.30
12	06-May-2014	CASH	743484	06	30,000.00	0.00	2,340.30
13	02-Jun-2014	SALARY		02	0.00	31,787.00	34,127.30
14	27-Jun-2014	CASH	743485	27	33,000.00	0.00	1,127.30
15	02-Jul-2014	SALARY		02	0.00	31,786.00	32,913.30
16	11-Jul-2014	CASH	743486	11	32,000.00	0.00	913.30
17	16-Jul-2014	PROFIT/LOSS	20157	01	0.00	698.00	1,611.30
18	16-Jul-2014	W.H.TAX	20158	01	69.80	0.00	1,541.50
19	25-Jul-2014	SALARY		25	0.00	33,179.00	34,720.50
20	06-Aug-2014	CASH	743487	06	34,600.00	0.00	120.50
21	01-Sep-2014	SALARY		01	0.00	33,712.00	33,832.50
22	12-Sep-2014	CASH	743488	12	16,500.00	0.00	17,332.50
23	15-Sep-2014	CASH	743489	15	15,000.00	0.00	2,332.50
24	01-Oct-2014	SALARY		01	0.00	33,712.00	36,044.50
25	27-Oct-2014	CASH	743490	27	36,000.00	0.00	44.50
26	31-Oct-2014	SALARY		31	0.00	33,713.00	33,757.50
27	01-Dec-2014	SALARY		01	0.00	33,713.00	67,470.50

This is a computer generated statement and does not require any signature

Page 1 of 3

Muhammad Hafiz


National Bank of Pakistan

Account Statement



18

Account Title(s) MUHAMMAD HAFIZ S/O M.AKRAM

Address: KALLAN
ATD

Town:
District:
City:
Province/State:
Country:
Product Name: PLS Savings Account
Currency:
CIF No: 6605472
Account No: 3082675797
IBAN:

Postal Code:

Branch Code/Name: 1314 Nathiagali Branch
Region Name: Abbotabad

Statement of Account

Statement Printing Date: 21-Jun-2016

28	29-Dec-2014	CASH	16971551	29	50,000.00	0.00	17,470.50
29	02-Jan-2015	SALARY	1	02	0.00	34,416.00	51,886.50
30	08-Jan-2015	CASH	16971552	08	50,000.00	0.00	1,886.50
31	09-Jan-2015	PROFIT/LOSS	20155	01	0.00	958.00	2,844.50
32	09-Jan-2015	W.H.TAX	20156	01	95.80	0.00	2,748.70
33	02-Feb-2015	SALARY	1	02	0.00	31,642.00	34,390.70
34	12-Feb-2015	CASH	16971553	12	34,300.00	0.00	90.70
35	02-Mar-2015	SALARY	1	02	0.00	31,642.00	31,732.70
36	13-Mar-2015	CASH	16971554	13	31,700.00	0.00	32.70
37	01-Apr-2015	SALARY	1	01	0.00	31,642.00	31,674.70
38	06-Apr-2015	CASH	16971555	06	31,500.00	0.00	174.70
39	04-May-2015	SALARY	2000311	04	0.00	34,292.00	34,466.70
40	08-May-2015	CASH	16971556	08	33,000.00	0.00	1,466.70
41	02-Jun-2015	SALARY	1	02	0.00	34,393.00	35,859.70
42	08-Jun-2015	CASH	16971557	08	35,700.00	0.00	159.70
43	02-Jul-2015	SALARY	1	02	0.00	34,361.00	34,520.70
44	09-Jul-2015	CASH	16971558	09	34,500.00	0.00	20.70
45	10-Jul-2015	PROFIT/LOSS	20153	01	0.00	250.00	270.70
46	10-Jul-2015	W.H.TAX	20154	01	25.00	0.00	245.70
47	03-Aug-2015	SALARY	1	03	0.00	37,158.00	37,403.70
48	19-Aug-2015	CASH	16971559	19	37,000.00	0.00	403.70
49	31-Aug-2015	SALARY	2000313	31	0.00	37,261.00	37,664.70
50	01-Sep-2015	CASH	16971560	01	37,400.00	0.00	264.70
51	03-Sep-2015	TRANSFER	2090005	03	0.00	350.00	614.70
52	21-Sep-2015	SALARY	2000317	21	0.00	37,261.00	37,875.70
53	13-Oct-2015	CASH WITHDRAWAL	16971561		37,600.00	0.00	275.70
54	02-Nov-2015	SALARY		02	0.00	36,917.00	37,192.70

This is a computer generated statement and does not require any signature

Page 2 of 3

Alkesh

National Bank of Pakistan

Account Statement

Account Title(s) MUHAMMAD HAFIZ S/O M.AKRAM



L9

Address: KALLAN
ATD

Town:
District:
City:
Province/State:
Country:
Product Name: PLS Savings Account
Currency:
CIF No: 6605472
Account No: 3082675797
IBAN:

Postal Code:

Branch Code/Name: 1314 Nathiagali Branch

Region Name: Abbotabad

Statement of Account

Statement Printing Date: 21-Jun-2016

55	23-Nov-2015	CASH WITHDRAWAL	16971562	37,000.00	0.00	192.70
56	30-Nov-2015	SALARY		0.00	36,917.00	37,109.70
57	07-Dec-2015	CASH WITHDRAWAL	16971563	37,000.00	0.00	109.70
58	31-Dec-2015	SALARY		0.00	37,632.00	37,741.70
59	07-Jan-2016	CASH WITHDRAWAL	16971564	37,000.00	0.00	741.70
60	11-Jan-2016	GROSS PROFIT		0.00	326.99	1,068.69
61	11-Jan-2016	WithHolding Tax		32.70	0.00	1,035.99
62	29-Jan-2016	SALARY		0.00	34,776.00	35,811.99
63	08-Feb-2016	CASH WITHDRAWAL	16971565	35,000.00	0.00	811.99
64	29-Feb-2016	SALARY		0.00	34,776.00	35,587.99
65	07-Mar-2016	CASH WITHDRAWAL	16971566	35,000.00	0.00	587.99
66	31-Mar-2016	SALARY		0.00	34,776.00	35,363.99
67	08-Apr-2016	CASH WITHDRAWAL	16971567	35,000.00	0.00	363.99
68	29-Apr-2016	SALARY		0.00	37,532.00	37,895.99
69	03-May-2016	CASH WITHDRAWAL	16971568	36,000.00	0.00	1,895.99
70	01-Jun-2016	SALARY		0.00	37,632.00	39,527.99
71	02-Jun-2016	CASH WITHDRAWAL	16971569	39,000.00	0.00	527.99

Total 36 Credit transactions of amount: 1,020,749.99

Total 35 Debit transactions of amount: 1,020,273.70

1,020,273.70

1,020,749.99

Attested
Hafiz

This is a computer generated statement and does not require any signature

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع ایبٹ آباد
عنوان :- ریٹائرمنٹ سروس

جناب عالی

بہت احترام سے گزارش ہے کہ اس حیدہ سائل 59/1984 سے بطور پرائمری ٹیچر
خدمات انجام دے رہا ہے۔ سائل کے سروس 35 سال سے زیادہ ہو چکے ہیں۔
سائل اب مزید سروس جاری نہیں رکھ سکتا۔ لہذا سائل اپنی ترقی سے
سروس سے ریٹائرمنٹ لینا چاہتا ہے۔ جسے 20/08/2015 سے ریٹائرمنٹ دی جائے۔
لہذا گزارش ہے حیدہ سائل کی ریٹائرمنٹ کی منظوری دی جائے
اور سائل کے واجبات سائل کو ادا کیے جائیں۔

Attested
[Signature]

الغرض

سائل محمد حفیظ بی ایس ٹی
سروس پیروٹ ایبٹ آباد
GMPSS سنٹرل کونسل یونین کونسل بکھوٹ
پر سائل نمبر 8646 CNIC-13101-0885519.1

[Signature]
18-8
2015
Muzaffar Ahmad
Muzaffar Ahmad
Muzaffar Ahmad

Submitted in original to SDEO (M) Atd along with S/ book
for the issue of retirement w.e.f 20/08/2015.

M. Jafar
[Signature]
19/8/15

[Signature]
19/08/2015

Attested
[Signature]

محفوظہ جناب ڈی۔ اے۔ صاحب قلم تعلیم ضلع ایبٹ آباد

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درخواست براد صدر علم ڈرامے پانے
انف سائل پٹو محمد حفیظ کورنٹ ڈرامی
مکتب سول سنٹرل کورٹ سیریا کفن نکلاں
کچھ قہقہا و خط ایبٹ آباد

Annexure 'B'

جناب عالی درخواست حقون ذیل ہے

دو جناب عالی، خود بیان گذارش جسک سائل کی وجہ تین سال قلم تعلیم ضلع ایبٹ آباد میں فوری ہے
عایب آباد وجہ دو سال سوئے میں کہ سائل کا آڈر کورنٹ ڈرامی مکتب
سول سنٹرل کورٹ سیریا کفن نکلاں میں ہوا ہے۔

دو جناب عالی

یہ کہ تقاضا وگت اس وجہ کے دوران سائل کو تنگ و پریشان کرنے سے ہے
جس کہ متعلق سائل نے جناب کو قبل ازین درخواستیں بھی دی ہیں کہ سائل
کو اس سول سے تبدیل کر کورنٹ ڈرامی سول کفن خود یا کورنٹ ڈرامی سول
چیتوئے لگا دیا جاوے کیونکہ یہاں کے وگت سائل تنگ کرتے ہیں

دو جناب عالی

یہ کہ سائل جن بات سے ڈرتا تھا آخر کار سائل کے ساتھ وہ ہی ہوا جناب عالی
کل روز 18 کو 1 سے ڈی۔ اے۔ آئی نئیب عباسی بونت دس بجے میرے
سول میرا 10 ماڈوں پر انفراد تقاضا وگت سائقہ رکھا گیا سائل سول نئیب
بچوں کو پڑھا رہا تھا مذکورہ ADI صاحب نے جاتے ہی نہایت غیر شرعی
غیر مندرجہ طریقہ سائل کو مخاطب کرتے ہوئے کہا کہ تم فوری طور فوری سے خارج
اور اہل کاغذ پر مجھ سے دستبردار اور خود سول کی میر لگا کر مجھے حکم دیا کہ
تم فارغ نہو ایبٹ آباد دفتر میں حاضر ہو کر وہاں نے تینیں جبری خارج کر دیا
دو جناب عالی مذکورہ ADI صاحب نے میری کوئی بات نہ سنی اور ان ہی وگت کے
ساتھ مجھ ریلوے دھکیاں دیکھو چلا گیا جسکو سائل نے جبری دیکھا کورنٹ کے
مشقت یہ کہ کتا میری آئی 17 سال سروس بنایا تھیں فوری کورنٹ میں
غریب آدمی ہوں جس پر مذکورہ صاحب نے یہاں سے ہونے اور میری کلمہ پر
ایک پٹو قلم لکھ کر عباسی ڈرامی سول کورنٹ سول سے میری جگہ سنٹرل کورٹ
لگا دیا

Handwritten signature

دو جناب عالی

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دو جناب عالی

یہ کہ سائل فوری کرنا چاہتا ہے ADI صاحب نے سائل کے ساتھ زیادتی کی ہے سائل
مذکورہ بالا دونوں سکولوں میں سے کسی ایک سکول تعینات کیا جاوے جناب
کی عین فوارنگ ہو جائے

Handwritten signature and date 19/10/15

Annexure "C" ANNEXURE 'C'

4

DEPARTMENT

KPK اور خیبر پختونخوا کے لیے
Please consider and decide as per rules.

DEPT. of Education

Personal Assistant
Elementary Education
Quetta

Director
Elementary Education
Khyber Pakhtunkhwa Province

جناب سید صاحب
میں نے قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات

1۔ میری سہیلی نے سکول کے کاموں میں
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات

2۔ میری سہیلی نے سکول کے کاموں میں
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات

3۔ میری سہیلی نے سکول کے کاموں میں
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات
میں قلمی طور پر اپنی گزارشات

قیس ان کے روزنامہ کا ذریعہ میں کہیں ہم اور کس کے نام سے نہیں دیکھا
میں بہت ہی عاجز و غریب ہوں۔ مجھے اس کا دلدار ہمارا
میرا دل نہیں چاہی کہ تم صاف زمانہ ہمارا
سے ایسے روزنامہ لکھو کہ اس کا اثر دیکھ کر میرا دل آسیر لے لے

اپنا آبادی 11/2015

NIC NO 15101-88953-19-1

مہر و فیصلہ پتہ PSF ملذم گورنمنٹ سب ڈسٹرکٹ سکول سنٹر روڈ
گورنمنٹ سکول روڈ ایبٹ آباد

0346 9523565

0346 9523565

فون

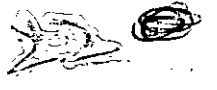
MUNAWAR SULTAN
Registration # 1051 Oaten St. Abbottabad
Name of Business: Pkdt in Writer Grade 2nd
Licensee expires: 4-11-2015
S. dal No. 4-11-2015
Free Received Recd: MUNAWAR SULTAN
Sig

Muhammad Wafer
Taser
GMPS Saranwala
Khan Kalan Road

حضرت جناب شہدائے بھارتی صاحب محمد تقی صاحب پھول پور جیلور پٹنہ

۵

24



درخواست برادر محالی ملازمت سٹیجیئر گورنمنٹ ہیرا پٹنہ پولیس
سٹیشن پولیس سٹیشن کن پلان پولیس سٹیشن ایسٹ آباد

جناب عالی

سائل حسب ذیل کم فیس ہاں ہیں

1. پہلے سائل عمر 30 سال نوکری سے وابستہ تھا اور سائل کا آڈر گورنمنٹ ہیرا پٹنہ پولیس
سٹیشن کن پلان میں ہوا

2. دوسرے سائل عزیز خاندان سے تعلق رکھتا ہے اور ذرا اچھے مکانی ماوراء کوٹی
اللہ اور آسٹریلیا کے صحابان کے سوا کوئی نہیں ہے

3. تیسرے ADO صاحب نے جو سے درخواست کی اور بعد نوکری سے فارغ ہو گیا جو کم از کم
تا انسانی پیمانی ہے اور دیگر خلاف کسی قسم کی شکایت وغیرہ موجود نہیں ہے

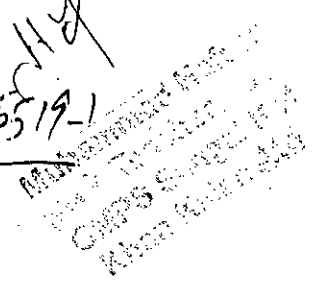
4. چوتھے درخواست آپ صحابان سے تشریح کرنا ہے کہ ADO صاحب کو
محالی کے احکامات جاری کریں کیونکہ سائل کا چھوٹا چھوٹا بچہ ہیں
اور ضعیف العمر والدین دعا گو رہیں

شہدائے بھارتی
محمد تقی صاحب

لینڈ انڈیا بمبائی ہے کہ بتھوری درخواست لیا محالی تا احکامات
صنادد فرمائی جا رہی

سائل محمد حفیظ اللہ پٹنہ
13101-0885519-1

Date 5/2/15



ANNEXURE 'D'
Annexure 25

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

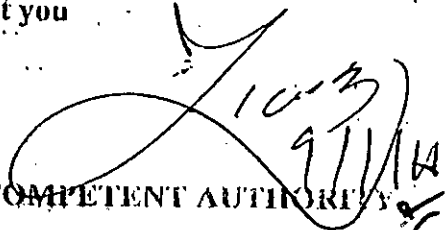
No. 951 /F.No.21/Vol-II

Dated 11-12-2015

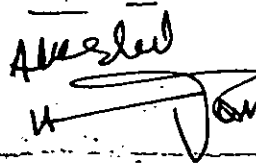
SHOW CAUSE NOTICE

I Zia-ud-Din, District Education Officer (Male) Abbottabad as Competent Authority under the Khyber Pakhtoonkhwa Government servants (Efficiency & Discipline) Rules, 2011, do hereby serve you Mr. Muhammad Hafeez, PST Govt: Primary School, Sangal Kot (Circle Birote) Abbottabad follows:

- a) You remained absent from duty w.e. from 30.9.2015 to 11.12.2015 as per report of ASDEO (Circle) Birote Abbottabad vide No. 34 dated 15.12.2015.
- b) There is no need of holding former enquiry in this case.
- c) In exercise of the power conferred by the Khyber Pakhtoonkhwa, Govt: Servant (Efficiency & Discipline) Rules, 2011, the Competent Authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice regarding your wilful absence from duty with the direction to submit your defence in writing within 15 (fifteen) days of the issuance of this notice as to why the major penalty of Rule 4 (b) of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person.
- d) In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defence to offer and ex-parte decision will be taken against you


COMPETENT AUTHORITY

Mr. Muhammad Hafeez, PST Govt: Primary School, Sangal Kot (Circle Birote) Abbottabad





OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) ABBOTTABAD

No. 251/F.No.21/Vol-II

Dated 11/01/2016 J

SHOW CAUSE NOTICE

I Zia-ud-Din, District Education Officer (Male) Abbottabad as Competent Authority under the Khyber Pakhtunkhwa Government servants (Efficiency & Discipline) Rules, 2011, do hereby serve you Mr. Muhammad Hafeez, PST Govt. Primary School, Sangal Kot (Circle Birote) Abbottabad follows:

- a. You remained absent from duty w.e.f 30/09/2015 to 11/12/2015 as per report of ASDEO (Circle) Birote Abbottabad vide No. 34 dated 15/12/2015.
- b. There is no need of holding former enquiry in this case.
- c. In exercise of the power conferred by the Khyber Pakhtunkhwa, Govt. Servant (Efficiency & Discipline) Rules, 2011, the Competent Authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice regarding your willful absence from duty with the direction to submit your defence in writing within 15 (fifteen) days of the issuance of this notice as to why the major penalty of Rule 4 (b) of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person.
- d. In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defence to offer and ex-parte decision will be taken against you.



COMPETENT AUTHORITY

Mr. Muhammad Hafeez, PST Govt. Primary School, Sangal Kot (Circle Birote) Abbottabad

کے طور پر صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں ایک ایسے ایجنڈے کے تحت

عنوان: صائب ڈیپارٹمنٹ ایجوکیشن، لاہور

تاریخ: 25/11/2015 No. 251
No. 251/2015-16

میں جواب دہ ذیل ہے۔
1. یہ کہ جو فیس جو الگ سے وصول ہو رہی ہے اسے الگ سے جمع کرنا ہے۔
2. یہ کہ ADP میں مندرجہ ذیل اسکولوں میں صاف پانی کی فراہمی کرنے سے منع کیا گیا ہے۔
3. یہ کہ صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں صاف پانی کی فراہمی کرنے سے منع کیا گیا ہے۔
4. یہ کہ اسکولوں میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
5. یہ کہ اسکولوں میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
6. یہ کہ اسکولوں میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
7. یہ کہ اسکولوں میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
8. یہ کہ اسکولوں میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
9. یہ کہ اسکولوں میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
10. یہ کہ اسکولوں میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔

صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔

صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔
صائب ڈیپارٹمنٹ ایجوکیشن، لاہور میں صاف پانی کی فراہمی کے لیے اسکولوں میں پائپ لائنیں لگوانی ہیں۔

NIC No. 131010895192
P.No. 03078142800

محمد علی
H Jan

9

28

بخدمت جناب DEO (مردانہ) ضلع ایبٹ آباد

عنوان: وضاحت منسوخی درخواست بتاریخ 18/08/2015 بابت ریٹائرمنٹ مسائل:

جناب عالی!

مؤدبانہ گزارش ہے کہ مسائل نے مورخہ 18/08/2015 کو ایک درخواست بابت ریٹائرمنٹ آنجناب کو دی تھی جس پر جناب منیب عباسی صاحب سابقہ ADO نے مجھ سے جبری طور پر دستخط کروائے تھے میں نے اپنی خوشی و رضامندی کے ساتھ دستخط نہیں کئے تھے اور میں نہ تو اس وقت ریٹائر ہونا چاہتا تھا اور نہ اب ریٹائر ہونا چاہتا ہوں بلکہ اپنی سروس جاری رکھنا چاہتا ہوں۔ یہ کہ مسائل کو مورخہ 18/08/2015 سے مسلسل فرائض منصبی کی ادائیگی سے روکا جاتا ہے اور مجھے رجسٹر حاضری پر دستخط ثبت کرنے سے زبردستی روکا ہوا ہے جبکہ مسائل ریگولر اپنی ڈیوٹی پر حاضر ہوتا ہوں اور اپنے فرائض بطریق احسن ادا کر رہا تھا جس کے ثبوت کے طور پر یہ اساتذہ ریکارڈ گواہ ہے۔

لہذا آنجناب سے التماس ہے کہ مسائل کی ریٹائرمنٹ والی مذکورہ بالا درخواست بتاریخ 18/08/2015 کو منسوخ فرمایا جاوے اور مسائل کو اپنے فرائض منصبی ادا کرنے کے احکامات صادر فرمائے جائیں تاکہ مسائل احسن طریقے سے اپنے فرائض سرانجام دینے کے قابل ہو سکے۔

المرقوم: 14/05/2016

العارض:

OK if

محمد حفیظ PST

گورنمنٹ مسجد سکول سنگل کوٹ کھن کلاں۔ یو۔ سی۔ بکوٹ

19/5/2016
کودی کی

Annexure

ANNEXURE

26
D-1

29

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD
RETIREMENT/ENCASHMENT

Sanction is hereby accorded to the grant of encashment of leave in lieu of not availing LPR for 365 days in respect of Mr. Muhammad Hafeez, PST CMPS Sangal Kot (Circle) Birote as due and admissible to him under the rules.

He stands retired from service on 20.8.2015 (Pre-Mature) upon completion of 30 Years-11 Months 15 days qualifying service

- Note:
1. Necessary entries to this effect should be made in his service book.
 2. Recovery of over payment, if any be made good from the official concerned.

Sd/—
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst: No. 4172 / EB-II/F.No.21/Vol-II/Complaint. Dated 24-5 /2015

Copy forwarded for information and necessary action to the:

1. Sub Divisional Education Officer (Male) Abbottabad w/r to his No.2315 dated 30.11.2015 alongwith Service Book of the above named teacher.
2. District Accounts Officer Abbottabad
3. Mr. Muhammad Hafeez, PST CMPS Sangal Kot (Circle) Birote

*Tausif Khan &
Ishaq Khan sb.
For n/a plear.*

*Shahid
S.D. Birote
26/09*

DISTRICT EDU. OFFICER (M)
ABBOTTABAD
[Signature]

*Attested
[Signature]*

اپیل

بخدمت جناب ڈائریکٹر سکرلز خیبر پختونخوا ایشیاویڈ

جناب عالی

مخدومانہ گزارش ہے کہ سٹاف پوسٹ 2016-5-14 آف درخواست DE 0
ایسٹ آباد مسسوحی ریٹائرمنٹ ڈی پی سی میری درخواست پر کارروائی کرنے
کے بجائے مجھے 16-5-2016 آرڈر نمبر 2417 کے تحت 15 ماہ قبل سے
ریٹائر کر دیا گیا ہے۔
جناب عالی! اس موقع پر عرض ہے کہ قبل از وقت ریٹائرمنٹ

میں لینا چاہیے۔
لہذا جناب سے استدعا ہے کہ میرا ریٹائرمنٹ
کا آرڈر نمبر 41720 بتاریخ 16-5-2016 منسوخ فرمایا جائے۔

الحارث
محمد حنیف P.S.T گورنمنٹ میجر سکول حدنگا لوہ کھن کلاں
ایسٹ آباد

المکرقوم 2016-06-06

6/6/2016

اللہ اعلم
H
Jani

ANNEXURE 'E' ³⁶  3

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

Appeal No. 1025 -A/2016

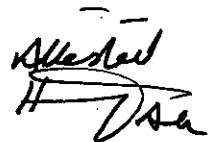
Muhammad Hafeez son of Akram, Ex PST teacher resident of Khan Khard
Cum Bakot, Tehsil & District, Abbottabad.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Abbottabad.
4. Muneeb Abbasi Assistant Education Officer (Male) Abbottabad.

...RESPONDENT



**APPEAL UNDER SECTION 4 KPK SERVICE
TRIBUNAL ACT AGAINST THE IMPUGNED
RETIREMENT ORDER NO. 4172/EB-H/F-
NO.21/VOL/COMPLAINANT DATED 24/05/2016
ISSUED BY RESPONDENT NO.3 WHICH IS**



ILLEGAL, AGAINST THE LAWS FACTS
CIRCUMSTANCE AND LIABLE TO BE SET ASIDE.

PRAYER:- ON ACCEPTANCE OF THE INSTANT
APPEAL, IMPUGNED RETIREMENT ORDER
NO.4172 DATED 24/05/2016 MAY KINDLY BE
DECLARED NULL AND VOID, AND APPELLANT
BE RESISTED ALONG WITH ALL BACK BENEFITS
AND ANY OTHER RELIEF WHICH THIS
HONOURABLE COURT DEEM FIT AND PROPER.

Respectfully Sheweth;-

This appeal mainly proceeds on bellow stated factual and
legal grounds.

Attested
H. J. D. Ac

1. That appellant was appointed on 03/08/1984 as
P.S.T teacher in education department.
2. That therefore appellant joined service and
continuously performed duty in different schools
with full devotion and liability till 24/05/2016 and
there had no complaint against appellant in respect

of duty. Copy of relevant pages of attendance register and pay slip Annexed "A".

3. That on 15/06/2013 respondent No.3 issued transfer order of appellant from GMPS Topa Khan Khurd to GMPS Sangal kote against vacant post and after receiving transfer order appellant took charge in the said school, and started duty therein.
4. That on 18/08/2015 ADO respondent No.4 on surprise visit to the school signed so called retirement order from appellant on the basis of interference of the local (MPA). Copy of application annexed as Annexure "A-1".
5. That on 19/08/2016 appellant preferred application before the DO / Respondent No.3 and stated all actual position of the incident. Copy of application dated 19/08/2015 annexed as Annexure "B".
6. That therefore, on 04/11/2015 and on 05/11/2015 appellant filed applications before respondent No.1 and 2 respectively. Copies application is annexed as Annexure "C".

Allooted
H. J. Das

34

7. That on 14/01/2016 respondent No.3 issued show cause notice on the allegation of absence from duty and on 26/01/2016 appellant filed reply of the show cause notice. Copy of show cause and reply is annexed as Annexure "D".
8. That thereafter, on 24/05/2016, respondent No.3 issued so called impugned retirement order of the appellant. Copy of order is annexed as Annexure "E".
9. That on 06/06/2016 appellant filed departmental appeal before the respondent No.2 against the impugned order dated 24/05/2016 issued by respondent No.3 but till dated respondent No.2 not given any response and similarly not passed any order on the said appeal. Copy of appeal is annexed as Annexure "F".
10. That feeling aggrieved with the orders so passed, appellant invokes, the jurisdiction of this Honourable Court on the following major points of law.

Attested
H.S. Jau

GROUNDS:-

- a. That impugned order dated 24/05/2016 against the law, facts and circumstances. Hence liable to be set aside.
- b. That order dated 24/05/2016 passed without personal hearing and legal formalities hence liable to be set aside.
- c. That impugned order passed against the basic principle of natural justice therefore liable to be set aside.
- d. That at the time of passing impugned order respondent No. 3 ignored all basic and legal requirement of law and procedure.
- e. That impugned order against the well known precedents of the superior courts of the country.

Attested
H. S. J. Oka

- f. That all proceeding were conducted on the direction of local (MPA) for political revenge.
- g. That order dated 214/05/2016 against the fundamental rights of the appellant.
- h. That respondent No. 3 not considered different application filed by the appellant for bringing actual facts and personal revenge of the respondent No. 4. hence order dated 24/05/2016 is liable to be set aside.
- i. That respondent No. 3 issued impugned order on the recommendation of respondent No. 4 and through which they deprived appellant from his basic right of further service hence order dated 24/05/2016 is liable to be set aside.
- j. That other points would be urge at the time of Arguments with the kind permission of this Honourable Court Tribunal Court.

Attested
[Signature]

It is, therefore, humbly prayed that on acceptance of the instant appeal, impugned retirement order No. 4172 dated 24/05/2016 may kindly be declared null and void, and appellant be resisted along with all back benefits and any other relief which this Honourable court deem fit and proper.



...APPELLANT

Through

Dated: 28-9 /2016



(HAMAYUN KHAN)


Advocate High Court, Abbottabad

VERIFICATION:-

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



...APPELLANT

Attested


ANNEXURE "F"

38

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD

Service Appeal No. 1025/2016

Date of Institution... 30.09.2016

Date of decision... 23.11.2017



Muhammad Hafeez son of Akram Ex-PST Teacher resident of Khan Khard Cum Bakot, Tehsil and District, Abbottabad. ... (Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar and 3 others. (Respondents)

MR. HAMAYUN KHAN,
Advocate

... For appellant.

MR. KABEERULLAH KHATTAK,
Addl. Advocate General,

... For respondents.

MR. NIAZ MUHAMMAD KHAN,
MR. AHMAD HASSAN,

... CHAIRMAN
... MEMBER


JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: Arguments of the learned counsel for the parties heard and record perused.

FACTS

2. The appellant is aggrieved from an order dated 24.05.2016 whereby he was retired from service prematurely, against which the appellant filed a departmental appeal on 06.06.2016 which was not responded to and thereafter he filed the present service appeal on 30.09.2016.

ATTESTED



ATTESTING OFFICER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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ARGUMENTS

3. The learned counsel for the appellant argued that signature of the appellant was obtained on a blank paper by ADO on 18.08.2015 which was then written by the said ADO as an application for retirement. That on the next day the appellant submitted an application to the District Education Officer concerned, stating therein that on 18.08.2015, ADO Muneeb Abbasi came to his school and asked him to sign the blank paper. That the appellant signed blank paper and he then filled the same paper and directed him that he was not required any more in service and that he had been terminated forcibly. This application was not responded to and the appellant then moved another application to the Director of Education, Elementary & Secondary Education on 04.11.2015 which was also not responded to then he filed another application on 05.11.2015 to the Secretary concerned. He further argued that on 11.1.2016 the appellant was given a show cause notice for his absence from duty from 30.09.2015 to 11.12.2015 which was duly replied to by the appellant. That thereafter, the impugned order was passed. He next contended that the whole proceedings are violative of law and rules and are not sustainable in the eyes of law.

Attested


4. On the other hand the learned Addl. Advocate General argued that there was a complaint on behalf of elders of the locality against the appellant regarding his inefficiency. That the appellant himself submitted an application for early retirement. That in a questionnaire during personal hearing on 14.5.2016, the appellant admitted his application for retirement.

ATTESTED


 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal,
 Peshawar

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CONCLUSION.

5. The very impugned order dated 24.05.2016 does not refer to any application moved by the appellant. This order does not give any clear cut message that under which provision and on which basis this order was passed. Had it been on the application of the appellant then under rules such pension is called "Retiring Pension". (under Rule 3.5 of the West Pakistan Civil Services Pension Rules). The premature pension is dealt with by Section 13 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 where under such pension can be ordered on the completion of 20 years of qualifying service for pension. But in case under Section 13, a notice is must to be given to the concerned civil servant which has not been done in this case. Presuming it for arguments sake that this order was passed on the basis of application submitted by the appellant then the concerned authority had not taken into consideration his other applications negating his application dated 18.08.2015. A civil servant cannot be dealt with by the department in the method in which the appellant was treated. Normally, when any person asks for retirement, it is the duty of the superior to look into the matter and to satisfy himself about voluntariness of the civil servant concerned and if the authority reaches the conclusion that any undue influence is exercised or application was in any manner not voluntary then such orders cannot be passed. But in the present case the appellant by so many applications to all the authorities had expressed his unwillingness of retirement. But despite all these circumstances the authority passed the order of retirement.

Attested
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6. If the appellant was inefficient and complaints were submitted by the elders of the locality against his inefficiency, then the proper course was to have

TESTED

WAVR
Khyber Pakhtunkhwa
Tribunal,
Peshawar

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conducted either departmental proceedings on the basis of inefficiency or to have ordered the retirement under Section 13 of the Khyber Pakhtunkhwa Civil Servants Act, 1973. But an inefficient person cannot be shown the doors ^{out of} ~~service~~ by adopting such indirect means.

7. Consequently the present appeal is accepted and the appellant is reinstated in service with all back benefits. The department is however, at liberty to proceed on the complaints in accordance with the observations mentioned above. Parties are left to bear their own costs. File be consigned to the record room.

Announced
23.11.2017
SD/- Niaz Muhammad Khan,
Chairman
Camp Const A/Abad.

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

SD/- Ahmad Hassan
Member

Date of Presentation of Application	28-11-17
Number of Words	1600
Copying Fee	10.00
Urgent	2.00
Total	12.00
Name of Copyist	<i>[Signature]</i>
Date of Completion of Copy	28-11-17
Date of Delivery of Copy	28-11-17

[Signature]
11/11/17

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Execution Petition No. 05 /2018

Muhammad Hafiz son of Akram, (PST Teacher), resident of Khankhurd cum Bakot, Tehsil and District, Abbottabad.

...PETITIONER

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary (E&SE) Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male), Abbottabad.

...RESPONDENTS

Attested
H. Khan

APPLICATION FOR IMPLEMENTATION
OF JUDGMENT DATED 23/11/2017 PASSED
BY THIS HONOURABLE TRIBUNAL IN
APPEAL NO. 1025/2016 TITLED
"MUHAMMAD HAFIZ V/S GOVT. OF KPK
& OTHERS.

Respectfully Sheweth:-

1. That petitioner filed service appeal No. 1025/2016 against impugned order passed by respondent No 3. Copy of appeal is attached as Annexure "A".


2. That on 23/11/2017 after hearing of arguments this Honourable tribunal accepted appeal of the petitioner alongwith all back benefits. Copy of judgment is attached as annexure "B".
3. That thereafter on 29/11/2017 petitioner filed application before the respondent No. 3 for implementation/ reinstatement with back benefits. Copy of application is attached as Annexure "C".
4. That after laps of 40 days respondents not implemented judgment of this Honourable Tribunal and similarly they have not filed any appeal before August Supreme Court of Pakistan against the judgment of Honourable Tribunal.
5. That respondent No. 3 instead of complying with the direction of this Honourable Tribunal, straightaway refused to comply with the direction of this Honourable Tribunal.
6. That other point would be raised at the time of arguments with kind permission of this Honourable Tribunal.

It is therefore, humbly prayed that on acceptance of instant application respondent No. 3 be kindly be directed forth with comply with the direction of this Honourable Tribunal contained in judgment dated 23/11/2017 in it true letter and spirit


...PETITIONER

Dated: 6-1/2018

Through


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

ANNEXURE 'H' 44

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD
REINSTATEMENT

In pursuance to Judgment of Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad passed in Service Appeal No.1025/2016 dated 23.11.2017, Mr. Muhammad Hafeez, Ex-PST GMPS Sangal Kot (Bakote), Abbottabad is hereby reinstated in service and further posted at GPS Saranda (Bakote) till the finalization of departmental proceedings.

Sd/-
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst: No 2018-52 / PF Hafeez PST(Litig)
Copy forwarded to the:-

Dated 16/03/2018

1. Registrar Honourable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad w/r to Judgment passed in service appeal No.1025/2016 dated 23.11.2017.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Comptroller of Accounts Abbottabad
4. Sub Divisional Education Officer (Male) Abbottabad.
5. Mr. Muhammad Hafeez, Ex-PST GMPS Sangal Kot presently reinstated & posted at GPS Saranda (Bakote) Abbottabad.

P. Ali
Asst. Dir. Elem. & Sec. Edu.
concerned
07/03/18

Sd/-
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Attested
9/3/18

311
7/3/18

۶۵ چارج رپورٹ

مسی محمد حفیظ PST آرڈر برائے D.E.O
صائب خورگہ $14\frac{2}{18}$ کو جاری کیا گیا۔ گورنمنٹ پرائمری

سکول سرانڈہ کھنڈاں آرڈر نمبر 2048-52

آج خورگہ $16\frac{3}{18}$ کو اپنے عہدہ کا چارج

لے لیا ہے

رپورٹ عرض خدمت ہے

16-3-18
PSHT
GPS SARANDA
ABBOTTABAD

دستی چارج دیندہ

دستی چارج کریندہ

Attested

Handwritten signature

CHARGE SHEET

ANNEXURE '1'

46

I Qazi. Tajammal Hussain, District Education Officer (Male) Abbottabad as Competent Authority, hereby charge you, Mr. Muhammad Hafeez, Ex-PST GMPS Sangal Kot (Bakote) presently reinstated & posted at GPS Sarhanda Bakote as follows:

1. That you, while posted as PST at GMPS Sangal Kot Circle Birote Abbottabad committed the following irregularities:
 - a) You are an inefficient and cannot read the Urdu news paper as per complaint filed by inhabitant of village Sangal Kot Bakote.
2. By reason of the above, you appear to be guilty of inefficiency, under Rule-3 of the Khyber Pakhtunkhwa Govt: Servants (E&D) Rules 2011 and have rendered yourself liable to all or any of the penalties specified rules 4 of the rules ibid.
3. You are, therefore, required to submit your written defense within ten days of the issuance of this Charge Sheet to the Inquiry Officer.
4. Your written defence, if any, should reach the Inquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegations is enclosed.

Mr. Muhammad Hafeez, PST
GPS Sarhanda Bakote

COMPETENT AUTHORITY

Attest
[Signature]

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

In pursuance to Judgment of Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad passed in service appeal No.1025/2016 dated 23.11.2017, Dr. Ianayat ur Rehman, V/Principal GHS No.1 Havelian is hereby appointed as Inquiry Officer to conduct inquiry under E&D Rules 2011, in respect of Mr. Muhammad Hafeez, Ex-PST GMPS Sangal Kot (Bakote) presently reinstated & posted at GPS Saranda Bakote and submit comprehensive report.

TERMS OF REFERENCE

To probe the following issues:-

- a) Mr. Muhammad Hafeez, PST GMPS Sangal Kot/^{is}an inefficient and cannot read the Urdu news paper as per complaint against him received through inhabitants of village Sangal Kot Bakote, .

The inquiry officer shall submit report to the undersigned within fifteen (15) days with solid recommendation as laid down in Rules 11 to 14 of the Khyber Pakhtunkhwa Govt. Servants Efficiency & Disciplinary Rules 2011. Opportunity of self defense and cross examination, the witness/evidence be provided to the accused.

sd
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst: No. 2402-06 / PF M. Hafeez PST (Litg)

Dated 22/2/2018

Copy forwarded to the:-

1. Registrar Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad w/r to Judgment passed in service appeal No.390/2016 dated 22.11.2017.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. Dr. Ianayat ur Rehman, V/Principal GHS No.1 Havelian alongwith copy relevant documents.
4. Sub Divisional Education Officer (Male) Abbottabad with the remarks to cooperate with the inquiry officer.
5. Mr. Muhammad Hafeez, Ex-PST GMPS Sangal Kot (Bakote) presently reinstated & posted at GPS Saranda Bakote.

sd
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Attestal
sd

DISCIPLINARY ACTION

48

Qazi Tajammal Hussain, District Education Officer (Male) Abbottabad as Competent Authority, am of the opinion that Mr. Muhammad Hafeez, Ex-PST GMPS Sangal Kot Bakote presently reinstated & posted at GPS Saranda Bakote has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

- a) You are an inefficient and cannot read the Urdu news papers as per complaint filed against inhabitant of village Sangal Kot Bakote,

For the purpose of inquiry of the said accused with reference to the above allegation Dr. Inayat ur Rehman V/Principal, GHS Havelian is hereby appointed as inquiry officer under Rule 10 (1) (a) of the Ibid Rules:

2. The inquiry officer shall, in accordance with the provisions of the Ibid Rules, provide you reasonable opportunity of hearing to the accused, record it findings and make, within fifteen days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.
3. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer.

Mr. Muhammad Hafeez, PST
GPS Saranda Bakote

COMPETENT AUTHORITY

Attested
H. D.



جواب خارج شدت تحریر 22/02/2018

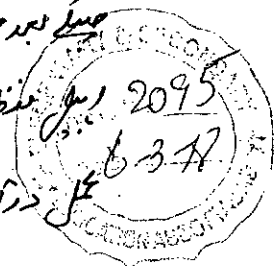
Handwritten signature and initials.

جواب ذیل ہے۔

1- یہ کہ میری تعیناتی جینٹ PSI/PTC سال 1984ء میں بعد از شدت انٹرویو ہوئی۔

2- یہ کہ بعد از تعیناتی میں باقاعدگی سے اپنے فرائض سرانجام دینا رہا مگر سال 2013ء کے جنرل الیکشن اور بعد ازاں سال 2015ء میں بلدیاتی الیکشن میں مخالف امیدواران کو ووٹ نہ دینے کی وجہ سے مجھے سیاسی انتقام کا نشانہ بنا گیا، کیونکہ موجودہ MPA حملہ 45 PK کے کارندہ مجھ سے ووٹ کا مطالبہ کرتا رہے اسی طرح بلدیاتی نمائندگان جن میں میرے عزیز و غلط کونسل و دیگر ممبران جن کو میں نے ووٹ نہ دیا تھا۔ انہوں نے مجھے نشانہ بنا یا اور او مجھے ہتھکڑوں پر لے کر آئے۔ میری خلاف بے بنیاد درخواست بازی کرتے رہے اور مذکورہ بالا ممبران کے اعزاء سابقہ ADO سرکل نے مجھے سیاسی انتقام کا نشانہ بنا یا اور مجھے جبراً ریٹائرڈ کیا اور سکول میں میرے داخلہ پر ہتھی لگائی۔

جیل بعد میں نے KPK سروس ٹریبونل میں سروس اپیل کی اور معزز عدالت نے میری اپیل منظور کرتے ہوئے مجھے بعد سے تعمیرات بجالی کا حکم صادر فرمایا جس پر تاحال جیل درآمد نہ ہوا ہے۔ اور نہ ہی مجھے ڈھائی سال کی سزا مل چکی ہے۔



3- یہ کہ مذکورہ بالا انتقامی کارروائی میں دفتری عملہ اور سیاسی پوسٹوں پر تعینات ADOs شامل رہے اور تاحال انتقام کے درجے ہیں۔

Attest
Handwritten signature.

4- یہ کہ بروئے قانون تعیناتی کے بعد کسی بھی ملازم سے دوبارہ شدت اور انٹرویو نہ لیا جائے گا۔ کیونکہ مجھ سے تین دہائیوں کے بعد اس کا مطالبہ کیا جاتا ہے کہ شدت اور انٹرویو دوں، دیوانے کی سوچ معلوم ہوتی ہے۔ اور اگر اس سے پہلے تو اس کے محکمہ کے ملازمین سے دوبارہ شدت اور انٹرویو لیا جائے تو میں بھی تیار ہوں۔

یہ کہ میں ”الحمد للہ“ محنت مند اور شہرت میں اور اپنے فرائض حسب سابق بخوبی ادا کرتا ہوں۔ عزیز یہ کہ آپ کے دفتری ایڈیٹران کی بدینہی اس امر سے بھی واضح ہو چکی ہے کہ مورخہ 22/02/2018 کی خارج شدت آج مورخہ 05/03/2018 کو وصول ہوئی۔

لکھنا سید عاصمہ مذکورہ خارج شدت والی لکھی ہوئی حکم عدالت کی تعمیل کی گئی۔
محمد حفیظ سابقہ PSI/PTC
05/03/2018

{ قلم خارج شدت }
{ لکھی }

گھونکے مال 1984ء سے کبھی 2015ء تک میں
ایسی طریقے سے ڈیوٹی سرانجام دینا یا مگر سیاسی
انتقام کی وجہ سے میری ادائیگی میں تاخیر اور بے شمار
الزامات عائد کیے۔

کہ 28 سال سے اس عہدے اور بعد از پینشن دوبارہ
سٹیٹ انٹرویو نہیں ہو سکتا ہے اگر آج بھی
دوبارہ سٹیٹ انٹرویو لینا چاہتا ہے تو تمام P.S.A
پتھریں لیں اور میں بھی تیار ہو

کہ ہندوستان کے نوٹوں میں جو نوٹوں کو اس سیاسی
انتقام کی وجہ سے اس وقت تک باقی رکھا گیا ہے
تو وہ ہیں جن میں کل 12 اور موجودہ نمبر 12
عزیزانہ روپے کا حکم ملتا ہے

لے لیا گیا
#

کے بارے میں مذکورہ نوٹوں کی
اور دیگر روائی کو داخل دستاویز میں
تمام سابق نمبر ہیں اور موجودہ نمبروں کی
ادائیگی کا حکم صادر فرمائیں

المترجم 27 اگست 2018ء

محمد حفیظ P.S.A گورنمنٹ پرائمری سکول سرحدہ پیر پورہ
ضلع ایبٹ آباد

(Handwritten signature)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

ORDER

ANNEXURE 'K'

56

1. WHEREAS, Mr. Muhammad Hafeez, PST Primary School Teacher GMPS Sangal Kot (presently posted at GPS Sarhanda) Circle Birote was retired from service w.e.from 20.8.2015 upon completion of 30 years, 11 months & 15 days qualifying service vide this office Endst: No.4172 dated 24.5.2016.
2. AND WHEREAS, in pursuance to the judgment of Honourable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad passed in Service Appeal No. 1025/2016 dated 23.11.2017, he was reinstated in service and further posted as GPS Sarhanda till the finalization of departmental proceedings vide this office Endst: No.2048-52 dated 14.02.2018.
3. AND WHEREAS, you Mr. Muhammad Hafeez, PST Primary School Head Teacher GPS Sarhanda (Birote) was proceeded under Rule-3 of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011.
4. AND WHEREAS, Inquiry Officer was appointed vide this Office Notification issued under Endst No. 2402-6 dated 22.02.2018 to conduct inquiry in accordance with law and provide you opportunity of self defence as well as cross examination, the witness against you. Charge Sheet and Statement of Allegations were served upon you through SDEO (M) Abbottabad vide this office Memo: No.2410 dated 22.02.2018.
5. AND WHEREAS, On receipt of findings of Inquiry report dated 23.2018, Show Cause Notice regarding your *inefficiency* was served upon you through Sub Divisional Education Officer (Male) Abbottabad vide this office Memo: No.5197 dated 28.4.2018, wherein major penalty of Compulsory Retirement from service was tentatively imposed upon you under Rule-3 of Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule, 2011.
6. AND WHEREAS, you submitted reply of the show cause notice on 27.8.2018 instead of stipulated period. You were summoned for personal hearing on 03.7.2018 vide this office of Memo: No.7415 dated 28.6.2018, but you failed to attend the same and recalled for personal hearing on 07.9.2018 through SDEO (M) Abbottabad vide this office Memo: No.9501 dated 31.8.2018 to avail the opportunity of self defence.
7. AND WHEREAS you appeared for personal hearing on 10.9.2018 and failed to defend the charges leveled against you.
8. And by reason of the above, charges leveled against you have been proved and you are found guilty of *inefficiency* under Rule-3 of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule, 2011.

9. NOW THEREFORE, the Competent Authority in exercise of the power conferred upon him under Rule-4 (1) (b) sub Rule (ii) of Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule, 2011 is pleased to impose major penalty of "COMPLUSORY RETIREMENT FROM SERVICE" upon Mr. Muhammad Hafeez, PST Primary School Teacher GPS Sarhanda (Birote) with immediate effect as you remained out of service from 20.8.2015 to 13.02.2018.

Mr. Muhammad Hafeez, PST Primary School Teacher GPS Sarhanda (Birote)
Endst: No. 11585-91

Endst: No. 11585-91 /M.Hafeez, PST/Lit

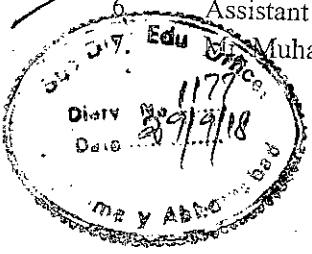
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Dated 27/9 /2018

Attested
[Signature]

Copy for information & necessary action to the:-

1. Registrar Honourable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad w/r to Judgment passed in Service Appeal No.1025/2016 dated 23.11.2017.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. District Comptroller of Accounts Abbottabad.
4. District Monitoring Officer (IMU) Abbottabad.
5. Sub Divisional Education Officer (M) Abbottabad.
6. Assistant Programmer EMIS Branch Local Office
7. Muhammad Hafeez, PST Primary School Teacher GPS Sarhanda (Birote).



DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

اپیل برصلاف حکم نمبر 27/09/2018 جسکی رو سے
 سائل نمبر 20/08/2015 سے جبراً ریٹائر کیا جو کہ
 سراسر غلط، خلاف قانون اور اختیارات کے
 ناجائز استعمال کا نتیجہ ہے لہذا ناقابل بحالی
 اور قابل منسوخی ہے۔

استدعا صلہ بمنظوری اپیل صفا حکم نمبر
 27/09/2018 جاری کردہ "ڈسٹرکٹ اچولکشی
 آف منیر (مردانہ) ایڈ آباد" کو مالدعم
 قرار دے کر سائل کو دوبارہ نوکری
 پر بحال کیا جا کر سابقہ بقایات ادا کرنا
 کا حکم بھی صادر فرمایا جائے۔

— x — x —

Attested
 H.C.
 D. Khan

صواب عالی! اپیل ذیل میں ہے۔

1- یہ کہ سائل/ایپلنٹ کی تعیناتی جسٹس PSC/PTC
 30/08/1984 کو ہوئی۔

2- یہ کہ اسکے بعد سائل نے باقاعدہ خارج لیکر اپنی ڈپٹی
 سرانجام دی۔ اور یہ سلسلہ 24/05/2016 تک جاری رہا۔

/

3- یہ کہ مورخہ 11/05/2016 کو سائل کو شوکار نوٹس

DEO نے جاری کیا جس میں سائل کے اوپر ڈپوٹی سے غیر حاضر رہنے کے الزامات عائد کیے گئے۔

4- یہ کہ مورخہ 24/05/2016 کو سائل کو مقامی سیاسی

مداخلت کی بنیاد پر منیب عباسی ADO کی اہلیہ پر DEO نے نوٹری سے خارج کیا۔

5- یہ کہ مذکورہ علی کا خلاف سائل نے محلیمانہ اپیل دائر

کیا اور بعد ازاں اپیل نمبر 1025/2016 بعنوان "محمد حفیظ نیلم گورنمنٹ" KPK گورنمنٹ

لعدالت سروس ٹریبونل KPK دائر کی۔

6- یہ کہ مورخہ 23/11/2017 کو سائل کی اپیل مع Back Benefits

عدالت نے منظور کیا۔

7- یہ کہ سائل نے دفتر سے ہرائے عمل درآء کرنے منظر عدالت

رابطہ کیا تو محکمہ نے عمل درآء کرنے سے صریحاً انکار کیا۔

تو سائل نے اہل سروس ٹریبونل میں دائر کیا۔

مورخہ 19/02/2018 کو DEO نے سائل کی بحالی

کا حکم جاری کیا۔

8- یہ کہ مورخہ 22/02/2018 کو سائل نے خلاف منیب عباسی

ADO اور DEO ظفر عباسی اور سہیل نامی

ڈسپلینری نے خارج شدت جاری کیا جس میں سائل

Attested
14
Jawar

پرے بنیاد اور من گھڑت الزامات عائد کیے اور عمداً
مذکورہ چارج شیٹ سائل کو ارسال نہ کی اور بعد میں
03/05/2018 کو جاری کیا۔

9- یہ کہ مورخہ 03/05/2018 کو سائل نے چارج شیٹ کا جواب
انکوٹری آفیسر ڈاکٹر عنایت الرحمن پر سنیل آفیسر
حوصلوں کے پاسی جمع کرنے تکلیف کیا، تو مذکورہ انکوٹری
آفیسر نے چارج شیٹ کا جواب جمع کرنے سے انکار کیا اور
مورخہ 06/03/2018 کو سائل نے DEO کے پاسی چارج
شیٹ کا جواب جمع کیا، جبکہ انکوٹری آفیسر نے سن
دفعہ انکوائری سے سائل کے بعد سائل نے 17/03/2018 کو بذریعہ
رہبری چارج شیٹ کا جواب انکوٹری آفیسر مذکورہ کو
جمع کیا۔

10- یہ کہ مورخہ 28/09/2018 کو DEO نے شوکارا نوٹس

جاری کیا مگر DEO اور اسکے ایگزاران کی بدینگی کی

وجہ سے چار ماہ تک سائل کو نہ بھیجا اور نہ علم رکھا

تھا۔ 27/08/2018 کو مذکورہ شوکارا نوٹس جب سائل کو

موصول ہوا تو سائل نے اسی دن DEO سے باہر

رہکارڈ رابطہ کیا مگر DEO صاحب نے سائل

کو رہکارڈ نہ دیا، جبکہ بعد سائل نے اپنی علم

کے مطابق 27/08/2018 کو مذکورہ شوکارا نوٹس کا

جواب دیا۔

Attested
[Signature]

(4)

11۔ یہ کہ DEO صاحب نے اپنے اختیارات کا ناجائز استعمال کرنے
 یوں 27/09/2018 کو سائل کو بغیر کسی وجہ کے بے بنیاد اور
 من گھڑت الزامات لگا کر نوکری سے جبراً ریٹائر کر دیا۔

د حکم لکھئے

12۔ یہ کہ سائل کا خلاف مذکورہ بالا تمام کارروائی اختیارات کے
 ناجائز استعمال، نظر نہ طور پر، غلط خلاف قانون،
 خلاف حالات و واقعات عمل میں لائی گئی ہے۔

لکھنا سندھ اسٹیشنری بنظوری اسٹیشن عملیاً نہ ہوا
 حکم نمبر 27/09/2018 جاری کردہ DEO (وردانہ)
 ایسٹ آباد کو کالعدم قرار دیا جا کر سائل کو
 مع سابقہ مراعات نوکری پر بحالی کے احکامات
 صادر فرمائی جائیں

Attestad
 #

الموجودہ: 10/01/2018
 دہلی النور ۲۰۱۸

محمد حفیظ (سابقہ PST) ولد حاجی اکرم
 کالہ کھن خورد ڈائنامک بکونٹریٹ
 ضلع ایسٹ آباد 9530565-0346

کورٹ فیس

وکالت نامہ

BEFORE THE H.P.K SERVICE TRIBUNAL

عنوان: Govt بنام M. Hafeez

مخانب: Appellant

Appeal

نوعیت مقدمہ:

ATD

باعث تحریر آنکے

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ اس مقام

Hamayun Khan Advocate H.C. ATD

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر حالت و فیصلہ بد حلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناشر، بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

الرقوم: U Jan 19

بمقام:

Accepted by

[Signature]

صفت
اسم
صفت

[Signature]

"B"

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

713

No.

Appeal No. 58 of 20 19

M. Hafeez Appellant/Petitioner

Through Beq. Eht. 15/16 Pesh. Respondent

Respondent No. 3

Notice to: —

Distt. Education Officer (Male)
Hattalabad

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

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

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

Given under my hand and the seal of this Court, at Peshawar this 26th Day of March 2019.

at Camp Court A. Akbar

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

TR

Appeal No. 58 of 20 19

M. Hafeez Appellant/Petitioner

Versus

Through Secy. Edu: Pesh: Respondent

Respondent No. 1.....

Notice to: —

Govt. of KP Through Secy:
Edu: & Sec: Education Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 17-6-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 26th.....

Day of Monday.....20 19

at Camp Court A. Abad

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

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