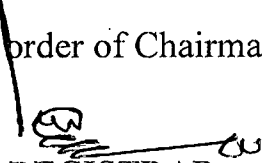


# FORM OF ORDER SHEET

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

Case No.- 1730/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/12/2022	<p>The appeal of Razia resubmitted today by Mr. Yasir Saleem Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellánt and her counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>


The objections raised by the Honorable tribunal are removed.  
The removed objections are as following:

**1-Objection No.1, 2, 3, 4 are removed, hence corrected.**

**2-Objection No.5, that 16.09.2014, 07.05.2014, and 07.03.2014 are attached as annexure (D & E), while 17.09.2018 is incorrectly mentioned due to clerical mistake while its 12.09.2018 mentioned on the same annexure (H) given as remarks, and in the 06.09.2019 the remarks are also given on the same annexure (I).**

**3-Objection No.6, departmental appeal is available on annexure (M).**

Hence Re-submitted today.

  
Afrasiab Khan Wazir  
Advocate High Court  
Peshawar


This is an appeal filed by Razia today on 28/10/2022 for release of salaries against which she show her departmental appeal/ representation in the present appeal which was made on 11.08.2022 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

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

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4-- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 5- Copies of applications/letter dated 16.1.2014,7.3.2014,17.9.2018 & 6.9.2019 in respect of appellant mentioned in para-3, 4, 8 & 9 respectively are not attached with the appeal which may be placed on it.
- 6- Copy of departmental appeal dated 11.08.2022 in respect of appellant is not attached with the appeal which may be placed on it.

No. 3086 /ST,

Dt. 20/10/2022.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Yasir Saleem Adv. Peshawar.

- Objets no 1, 2, & 3 are removed
  - Objets no 4 enquiry report is attached as Annex C,
  - Objets no 5 Dept appeal is an Annex (A), while Adjutmt/Release of pay is attached as Annex (F), and the list of the appellant is given Annex (D), 11/12/19 page attached.
  - Objets H & G, Annex H better is (replaced by better copy) and Annex G is readable.
  - Objets no 7 is removed
- Annex (F) submitted today
- Yasir Saleem Adv. Peshawar

**IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. 1730 /2022

Razia

.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa & others

.....Respondents

**INDEX**

S.No	Description of Documents	Annex	Pages
1.	Service Appeal alongwith affidavit		1-5
2.	Address of Parties		6
3.	Copy of the Office Order dated 21.12.2013	A	7
4.	Copies of the application dated 16.12.2013 and re-adjustment dated 07.03.2014	B&C	8-9
5.	Copies of the appeal dated 07.03.2014 and letter dated 07.03.2014	D&E	10-11
6.	Copy of the inquiry report dated 05.04.2014	F	12.
7.	Copies of the letter dated 07.06.2018	G	13
8.	Copy of the appeal dated 12.09.2018	H	14
9.	Copy of the appeal dated 09.01.2019	I	15
10.	Copy of Office Order dated 30.01.2019	J	16
11.	Copies of the letter dated 16.02.2019& advertisement dated 21.12.2018	K&L	17-18
12.	Copy of appeal and office order dated 11.08.2022	M & N	19-20
13.	Copy of report of inquiry committee dated 08.09.2022	O	21.
14.	Wakalatnama		22.

*Razia*  
Appellant

Through:

  
**YASIR SALEEM**  
Advocate High Court

&

**Afarsyab Wazir**  
Advocate High Court

①

**IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. 1730 /2022

**Razia PTC Government Girls Primary School Zar Muhammad Kot North  
Waziristan District**

.....Appellant

**VERSUS**

1. **Government of Khyber Pakhtunkhwa**, through the Secretary Elementary & Secondary Education, Peshawar.
2. **Secretary Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar.
3. **Director Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar
4. **District Education Officer**, North Waziristan.

.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT AGAINST INACTION OF THE RESPONDENTS REGARDING THE RELEASE OF SALARIES OF THE APPELLANT DESPITE THE FACT THAT HE IS STILL ON THE ROLL OF THE DEPARTMENT AS PERFORMING HIS DUTIES AND HAS NOT RESPONDED THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.**

**Prayer-in-Appeal:**

**On acceptance of this Service Appeal, respondents may kindly be directed to release the salaries of the appellant from the date of stoppage and to adjust the appellant on his post.**

**Respectfully Sheweth:-**

1. That the appellant was initially appointed as PTC in the Respondent establishment vide office order dated 21.12.2013. ***(Copy of the Office Order dated 21.12.2013 is attached as Annexure A).***
2. That the Appellant, ever since her appointment as PTC teachers in 2013, had been performing her duties without any complaint, albeit the appellant had been denied her salaries. Later the nomenclature of PTC is changed to PST. Ever since appointment, the Appellant has agitated the matter of adjustment and release of her salaries.
3. The since the Appellant was not paid her salary, she was constrained to filed application dated 16.01.2014 to the then Director Education FATA for the redressel of her grievances. The application was processed and the Appellant was issued re-adjustment order vide notification dated 07.02.2014. ***(Copies of the application dated 16.01.2014 and re-adjustment dated 07.05.2014 are attached as Annexure B & C)***
4. That although the Appellant was readjusted, however her salary was not released, therefore the appellant filed appeal to Additional Accountant General, Peshawar on 07.03.2014 which was processed and vide letter dated 07.03.2014 the then Agency Accounts Officer was requested to entertain the claims of appellant. ***(Copies of the appeal dated 07.03.2014 and letter dated 07.03.2014 are attached as Annexure D & E)***
5. That an inquiry committee was also constituted in the matter on the instructions of the then Agency Education Officer North Waziristan vide his letter dated 04.02.2014. The inquiry committee conducted its inquiry and submitted its report on 05.04.2014 wherein it was recommended to release the salary of the Appellant. ***(Copy of the inquiry report dated 05.04.2014 is attached as Annexure F)***
6. That later when the law and order situation got worsen due to militancy, the appellant alongwith her family migrate being IDPs in June 2014 to Peshawar.

7. That the Appellant throughout agitated the matter of release of her salary with the respondents on the post. One of the appeals was processed and Agency Education Officer (NWA)/ District Education Officer were asked to resolve the issue. The Respondent No. 4 replied vide his letter dated 07.06.2018 admitted that neither the Appellant were terminated nor she has been paid her salary, further added that pay bill was submitted to the accounts officer in the year 2014 which was returned with the remarks that the bill would be passed after the post verification. **(Copy of the letter dated 07.06.2018 is attached as Annexure G)**
8. That later on another appeal dated 12.09.2018 was submitted to the Respondent No. 3 which was marked to the Respondent NO.4 to release the pay vide his remarks dated 17.09.2018 on the body of the said appeal. **(Copy of the appeal dated 12.09.2018 is attached as Annexure H)**
9. That the above cited appeal was followed by another appeal dated 06.01.2019 again to Respondent No. 3 which was again marked to the Respondent No. 4 with a query that why the salary has not been released to the Appellant vide his remarks dated 09.01.2019 on the body of the appeal. **(Copy of the appeal dated 06.01.2019 is attached as Annexure I)**
10. That while processing the appeal dated 09.01.2019, the Respondent No. 3 directed the respondent No. 4 vide office order dated 30.01.2019 to implement his directives already made by him in his remarks on the appeal dated 09.01.2019 of the Appellant. **(Copy of Office Order dated 30.01.2019 are attached as Annexure J)**
11. That the office order dated 30.01.2019 was replied by the Respondent No. 4 vide his letter dated 16.02.2019 wherein he admitted that Appellant was never terminated. Astonishingly he added that the many posts including the post of the Appellant has been advertised published in newspaper dated 21.12.2018. **(Copies of the letter dated 16.02.2019 & advertisement dated 21.12.2018 are attached as Annexure K & L)**

- 12. That still the appellant is pursuing the case and lastly filed his appeal to respondent No. 2 for redressal of his grievances vide his appeal dated 11.08.2022 which was forwarded to DEO North Waziristan with directions to resolve the issue under intimation to this office vide order dated ~~08.11.2022~~<sup>11-8-</sup> 11.08.2022. (Copy of appeal and office order dated 11.08.2022 are attached as **annexure M & N**).
- 13. That in response the DEO referred the matter to already constituted inquiry committee to probe the matter in hand, where-after the inquiry committee submitted his report to the DEO on 08.09.2022. (Copy of report of inquiry committee dated 08.09.2022 is attached as **annexure O**).
- 14. That the acts and omissions of the respondents regarding stoppage of salaries of the appellant is illegal and unconstitutional inter alia on the following grounds.

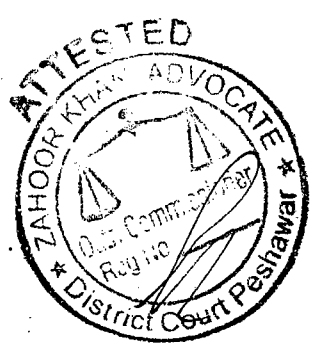
**GROUND:**

- A. **That** the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the law are badly violated
- B. **That** withholding of salary amounts to punishment albeit without any charge sheet or show cause notice his salary has been stopped.
- C. **That** ever since appointment as PTC (PST) in 2014, the Appellant has been on the roll of the department and has not been terminated yet.
- D. **That** the appellant has been denied of her livelihood, which amounts to violation of Article-4 of the Constitution of Islamic republic of Pakistan, 1973, it is the fundamental right of the Appellant that she must be paid her salary for the services she are rendering for the respondents.
- E. **That** since her services has not been terminated, therefore she is on the strength of the department for all intents and purposes, thus being civil servant, she is entitled for salary of her post.



- F. **That** from the reply/ letter dated 16.02.2019 of the respondent No. 4, it is quite clear that the Post against which the Appellant has been promoted is still in field meaning thereby the Appellant is still on the roll of the department, so it is in the interest of justice not to re-advertise the posts but to adjust on her respective post and also release her pay also.
- G. **That** since the issue relates to the monthly salaries and adjustment of the appellant in service, therefore the matter being recurring, hence no time limitation runs in the instant matter.
- H. **That** the appellant has been appointed by the competent authority, duly took over charge of her post and performed her duties thus valuable rights have been created in her favour the same cannot be undone or snatched away from them illegally.
- I. **That** the appellant seek the permission of this Honourable Court to rely on additional grounds at the hearing of this petition.

***It is, therefore prayed that the Service Appeal may please be allowed in favour of appellant as prayed for.***



Through:

*Razvi*  
Appellant  
*[Signature]*  
**YASIR SALEEM**  
Advocate High Court  
&  
**Afarsyab Wazir**  
Advocate High Court

**CERTIFICATE:**

It is certified that that appellant has not previously moved any service appeal regarding the instant matter.

*[Signature]*  
**ADVOCATE**

**AFFIDAVIT:**

It is do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon;able Tribunal.

*Razvi*  
**DEPONENT**

6

**IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_/2022

Razia

.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa & others

.....Respondents

**ADDRESSES OF PARTIES**

**APPELLANT:**

Razia PTC Government Girls Primary School Zar Muhammad Kot  
North Waziristan District

**RESPONDENTS:**

1. **Government of Khyber Pakhtunkhwa**, through the Secretary Elementary & Secondary Education, Peshawar.
2. **Secretary Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar.
3. **Director Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar
4. **District Education Officer**, North Waziristan.

Through:

  
Appellant

**YASIR SALEEM**

Advocate High Court

&

**Afarsyab Wazir**

Advocate High Court

**EDUCATION OFFICER/NORTH WAZIRISTAN AGENCY**  
 Appointment Order

As per recommendation of Selection Committee and approval of the worthy Director Education FATA. The following male / female PTC is hereby appointed against the vacant post in BPS-09 plus usual allowances as admissible under the rules mentioned against each with immediate effect from their taking overcharge against the post noted against each in the best interest of public.

S#	Name	Place of Posting	Remarks
1	Ruqia PTC	GGPS Adam Khan Kot	AVP
2	Bushra Qadir PTC	GGPS, Akhtar Nawaz Kot	
3	Zaibun Nisa PTC	GGPS, Ghulam Sher Khan Kot.	
4	M. Shahid PTC	GPS, Awal Knari Kot.	
5	Ijaz-ur- Rehman PTC	GPS, Gul Rauf Kot.	
6	Asad Ullah PTC	Zar Gul Khan Kot	
7	Imran Ullah PTC	GPS, Noor Khan Mada Khel.	
8	Taskin PTC	GGPS, Rehmat Ullah Kot	
9	Amra Haider PTC	GGPS, Muhammad Amin Kot.	
10	Sawal Haider PTC	GGPS, Sher Dad Kot.	
11	Jabreela PTC	GGPS, Shahzad Gul Kot.	
12	Smina Naz PTC	GGPS, Muhammad Noor Din Kot.	
13	Abid Rehman PTC	GPS, Darpa Khel.	
14	Razia PTC	GGPS Zar Muhammad Kot	
15	Noor Zahid PTC	GPS, Muhammad Aslam Kot.	
16	Abdul Qayum PTC	GPS, Inayat Khan Kot.	
17	Usma Rashid PST	GGPS Rasool Khan kot.	
18	Janzeba PST	GGPS Zindai kot.	

**Terms & Conditions**

1. Their appointments are made on contract / temporary basis and liable to be terminated any time and without any notice.
2. They should bring their medical certificate from Medical Supdt AHQ Hospital Miranshah. If they fail to assume their charges within 15 days, their orders will be treated as cancelled.
3. Their original CNICs should be produced to the accountant local office.
4. Their services will be terminated if they found absent for days continuously from the date of taking over.

*Abid d*  
 ✓

*[Signature]*  
 Agency Education Officer  
 North Waziristan Agency

Encl: No. 1035-41

ATTESTER

Dated: 21/12/2013

Copy to the:-

1. Director Education FATA, Governor Secretariat, Peshawar.
2. Political Agent North Waziristan Agency Miranshah.
3. Agency Accounts Officer, NWA.
4. AAEO circle concerned.
5. Head Teacher concerned.
6. The Accountant Local Officer.
7. Candidates Concerned.

*[Signature]*  
 Agency Education Officer  
 North Waziristan Agency

حصہ ڈائریکٹر ایجوکیشن خانہ سوراہک لہور لیاؤ  
Amex 35  
مندان - جاخواست برائے ڈائریکٹر افسانہ Pay

گزارش کا حصہ  
دو کے بند کے بعد اور اس میں written order دینے سے اور ڈائریکٹر ایجوکیشن  
نے اپنے بند کے بند اور ABO افسانہ کے ساتھ ساتھ سٹور سے کام  
تو یہ سٹور سٹیشن انڈر دیا جائے۔ اگر سٹور سٹیشن سے سٹور سٹیشن کے بند  
کی ڈائریکٹر کے احکامات سے اور سٹور سٹیشن کے بند کو سٹور سٹیشن  
سے سٹور سٹیشن سے  
Date 16/1/14

Director  
Amex 35  
مندان وغیرہ

ABO NWA

Please resolve the  
Matter of the teachers are  
terminated, give them termination  
order if not they do have  
right for salary. Why they have  
been kept under stores. If  
they were reported absent, then  
there must be a written proof to  
refer.

16-01-14  
DE PATA

Director Education  
PATA.

Director

ATTESTED

Annex 'C'

(9)

Office Of The Agency Education Officer North Waziristan Agency Miranshah

Re- Adjustment Order

According to the order of the worthy Director education FATA, Khyb Pakhtunkhwa, Peshawar order dated 16-1-2014. The following candidates are hereby adjusted / release of pay against the vacant of post of PTC mentioned against their name with immediate effect in the larger interest of justice.

Note: - Necessary entries should be made in their service books.

- |                        |                              |
|------------------------|------------------------------|
| 1. Ruqia PTC           | GGPS Adam Khan Kot           |
| 2. Bushra Qadir PTC    | GGPS, Akhtar Nawaz Kot       |
| 3. Zaibun Nisa PTC     | GGPS, Ghulam Sher Khan Kot.  |
| 4. M. Shahid PTC       | GPS, Awal Khan Kot.          |
| 5. Ijaz-ur- Rehman PTC | GPS, Gul Rauf Kot.           |
| 6. Asad Ullah PTC      | Zar Gul Khan Kot.            |
| 7. Imran Ullah PTC     | GPS, Noor Khan Mada Khel.    |
| 8. Taskin PTC          | GGPS, Rehmat Ullah Kot.      |
| 9. Amra Haider PTC     | GGPS, Muhammad Amin Kot.     |
| 10. Sawal Haider PTC   | GGPS, Sher Dad Kot.          |
| 11. Jabreela PTC       | GGPS, Shahzad Gul Kot.       |
| 12. Smina Naz PTC      | GGPS, Muhammad Noor Din Kot. |
| 13. Abid Rehman PTC    | GPS, Darpa Khel.             |
| 14. Razia PTC          | GGPS Zar Muhammad Kot.       |
| 15. Noor Zehra PTC     | GPS, Muhammad Aslam Kot.     |
| 16. Abdul Qayum PTC    | GPS, Inayat Khan Kot.        |
| 17. Umera Rashid PST   | GGPS Rasool Khan Kot.        |
| 18. Janzaba PST        | GGPS Zindalet.               |

*[Signature]*  
Agency Education Officer  
North Waziristan Agency

Encl: No. 365-68 / R-Adj: PTC/MRN/AEO dated 7/5 /2014

Copy to the:-

1. Director Education FATA KPK, Peshawar w/r to his order dated 16-12-2013.
2. Agency Accounts Officer North Waziristan Agency.
3. AAEO Circle Concerned.
4. Accountant Local office is directed to prepare their bills with immediate effect and onward submission in favour of the Teachers mentioned above accordingly.

*[Signature]*  
Agency Education Officer  
North Waziristan Agency

*[Signature]*

ATTESTED

*[Signature]*

Aux D  
(10)

The Add: Acc: General  
AGPS Sub Office Desk

Subject Appeal For Justice

R/Sri,

with great respect it is stated  
that our pays was stopped by the CR APOs  
w. agency of without any cogent reasons/written  
order. The AEO has released our pays but the Account  
officer NW Agency did not entertain our claims or was  
delay tactics.

Therefore it is humbly prayed that necessary order  
may kindly be passed <sup>to APOs</sup> to entertain our claims without  
any further delay cases which have already been  
got delay, for which we shall be greatful to you  
for this regards.

Dated. 6/3/14

Yours

Yours Sincerely

- 1- Rusia PTC and others  
Jahans
- Jehanzeb PTC and others  
M. Zabit Ishaan PTC and others  
A.S.
- 2- Ihsanullah T.T. and others

Pl look into the matter  
and process it

A.A.O / Mr. Sub

7/3/14

Attest  
A

ATETSTED

Annex E (11)

# Accountant General

Pakistan Revenues, Sub Office, Peshawar  
Ph # 091-9211278 Fax# 091-9211301

Legal Cell/General Corr/2013-14/113

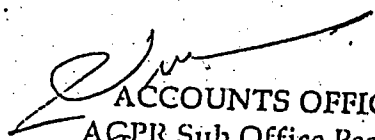
Dated; 07.03.2014

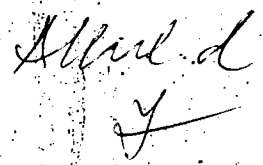
The Agency Accounts Officer  
North Waziristan Agency  
Miranshah

Subject: APPEAL FOR JUSTICE

I am directed to enclosed herewith a copy of appeal submitted by MS  
Razia Pst and others and Jehanzeba PTC and others which is self-explanatory.

The additional Accountant General AGPR sub Office Peshawar has  
recorded his directive on the face of the said appeal you are therefore requested  
to entertain the claims submitted by the applicants after completing all codded  
formalities

  
ACCOUNTS OFFICER  
AGPR Sub Office Peshawar



  
TESTED  


Ann R (19) (15)

Office of the Agency Education Officer North Waziristan Agency

From

The Enquiry Committee

To

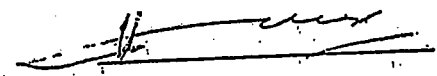
The Agency Education Officer  
North Waziristan Agency

Subject: Enquiry

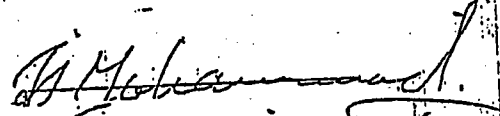
Memo:

Kindly refer to your order dated 4/2/2014 on the subject noted above and to state that we the undersigned checked the record and determined that the contain mentioned in the appeal filed by Ruqia and Others to the Director Education FATA on date 11/1 /2014, is based on fact and found that neither they were terminated nor released their pays until now. They are deserve for the same as requested in the appeal please.

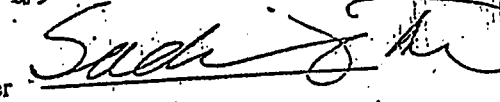
1- Mr Umar Niaz Khan Supdt

Chairman 

2- Taj Muhammad AAEO


Member 

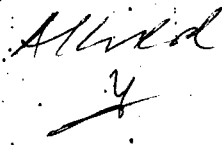
3- Sadiq Ali AAEO

Member 

Agreed and Physically Checked

Attested

  
A. E. O. 5/9/14



ATTESTED



OFFICE OF THE DISTRICT EDUCATION OFFICER NORTH WAZIRISTAN  
TRIBAL DISTRICT

Dated 21/5/2018

No. 5342 / Appointment DEO/WTD

The Director Education  
Newly Merged Districts Khyber  
Pakhtunkhwa, Warsak Road Peshawar

APPEAL FOR ADJUSTMENT / RELEASE OF PAY

Subject  
Memo:

Kindly refer to your remarks on the body of an appeal to resolve the issue in respect of \*  
Fahim Junior Clerk on the subject cited above and to state that Ex. DEO has been issued order on 24-01-

2014 in the light of notification dated 24-01-2013 (copy attached).

It is further stated that Ex. DEO has issued order in respect of Rujia PTC and others after  
enquiry (copy attached).

Pay bill of the above officials have been submitted to the accounts office NWD.  
Miran Shah and returned with the remarks that bills will entertain / passed after post verification (copy  
attached).

It is further added that neither they were terminated nor release their pays up till now.  
They are performing their duties regularly to the entire satisfaction of their superior up till. But  
presently there are no vacant posts of PTC / Junior Clerk to adjust them for release of pay as they need  
vacancies. As and when the posts are available / exist in the office of undersigned, they will be adjusted  
For the release of pay accordingly to avoid more litigation, please.

Report is submitted for further necessary action, please.

District Education Officer  
North Waziristan Tribal District

*Muz*

3956  
11-7-18

ATTESTED

*Muz 9/13*

ATLANTA

Atlanta

DIRECTOR OF INVESTIGATION  
FEDERAL BUREAU OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE

Your associate,  
Linger  
Kugan etc. with an  
ethics of Fahimullah and  
and others.

As mentioned  
in  
the  
report  
of  
the  
committee  
on  
the  
ethics  
of  
Fahimullah  
and  
others.

Dated 12/21/18

of your issued direction one way or another way, we shall  
during the case, which have already been changed  
to ensure that there are no gaps without in further  
likely you in the minimum order of we were not  
pays up cut in. If we were to minimize them  
neither we were to minimize nor release them  
but no action has been taken on these directions.  
On this connection you had office has been issued  
clear directions to go north for ethics of pays  
any written order verbally.  
The ethics great respect it is stated that  
the ex-DE part has been stated on pays without  
any written order verbally.

Appreciate for ethics of pays in 1/10  
Kugan etc. and others a Fahimullah and others

the honorable Director Sir,  
A. M. A.  
14

(A)

signature

★  
Mishra

Date 5/11/09

Yours obediently  
Rajiv Ruggie and other  
Rajiv Ruggie

My comments with  
me. I am so  
happy with  
the documents  
you have provided.

It is one again requested in your kind letter that  
a necessary order may kindly be passed to ABO NISA to  
release our pays for all persons.  
Please note that we have already been  
not terminated. Then issue direction to ABO NISA  
if we were terminated. Please issue direction to give  
things it is brought into your kind notice that  
determination is believed our pays settlement  
is worthily mentioned that neither we ever  
directions but using a delay tactics.  
but no action has been taken on your  
a clear directions to ABO NISA for release of pays  
in this connection your good office has been issued.  
any further order verbally.  
ex Director EMI PATR has been stopped our pays without  
R/Sri, with great respect it is stated that the  
subject: Appeal for release of salaries in w/o Ruggie and  
FATA message read fresh.

(15)

Ans I (15)

The Honorable Director Education.

FATA message read fresh.

Appeal for release of salaries in w/o Ruggie and

Subject:

List of appellants are attached.

- 2 - Bushra Bader
- 3 - Tabbara
- 3 - Tabbara Nisa
- 4 - M. Shafiq
- 4 - M. Shafiq
- 5 - Iqbal Rehman
- 5 - Asadullah
- 7 - Imran Ullah
- 8 - Taskeen
- 9 - Sami Haidar
- 10 - Jibreel
- 11 - Samina Naz
- 12 - Abdul Rehman
- 13 - Faysal Raza
- 14 - Amir Jaid
- 15 - Abdul Baqar
- 16 - Lura Rashid
- 17 - Zahid

~~Atish~~

~~Blind~~

DIRECTORATE OF EDUCATION  
NEWLY MERGED TRIBAL DISTRICTS  
WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE. 091-9210166 FAX 091-9210216

No. 1666 /Date Pesh: the 30/11 /2019

To

The District Education Officer,  
North Waziristan District.

Subject: APPEAL FOR ADJUSTMENT/RELEASE OF PAY.

Memo:

I am directed to refer to this office letter No. 300 dated 7/1/2019 on subject noted above and to enclose herewith an application in respect of Mr. Fahimullah Junior Clerk and Mst: Ruqia PST and others of North Waziristan District and to ask you to implement the directions on the body of the previous applications dated 09.01.2019.

I am further directed to ask you to follow the directions put up by Director Education Erstwhile FATA on the body of enclosed application under intimation to this office positively please.

Encl: A.A.

Endst: No. \_\_\_\_\_ /-

Copy to the :-

1. District Accounts Officer NWD for necessary action.
2. PA to Director Education NMTD,

Deputy Director (F/A)

Dated Pesh: the \_\_\_\_\_ /2019. 29/11/19

Deputy Director (F/A).

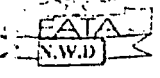
*Ali Akbar*

REGISTERED

Annex K. (17)

OFFICE OF THE DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH.

No. 1064 /DEO/NWTD Dated: 16 /02/2019



(17)

TO:

The Director Education  
Newly Merged District KPK Peshawar.

Subject: APPEAL FOR ADJUSTMENT/RELEASE OF PAY.

Memo:

Reference your letter No:1665 dated 30/01/2019 the undersigned was directed to release the salaries and adjust the applicants if there is no termination order and cogent reason in this connection the Ex.District Education Officer submitted a detail report along with enquiry report vide letter No:4347 dated 7/06/2018.

This office searched a lot, but we found no termination order on the record of this office. Moreover, this office has advertised the posts of all categories for filling up through ETEA. Hence this office is unable to release/adjust the applicants as they need vacancies.

Report is submitted for your perusal and further necessary action please.

*Ali Akbar*

*[Signature]*  
DISTRICT EDUCATION OFFICER  
North Waziristan Miranshah.

# دور نامہ

کے نام سے 30 جنوری 2019ء سے 30 جون 2019ء تک درخواستیں مندرجہ ذیل اسماں پورہ کورسز کے لیے قبول کی جائیں گی۔ درخواستیں مندرجہ ذیل اسماں پورہ کورسز کے لیے قبول کی جائیں گی۔ درخواستیں مندرجہ ذیل اسماں پورہ کورسز کے لیے قبول کی جائیں گی۔

رد نمبر	کورس نام	درجہ	تعمیراتی سال	دور نامہ کی شرائط
1	سی (CT) برآمدات (BPS-16)	ایس ایچ ای	35-19 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔
2	ای ایم (DM) (BPS-16)	ایس ایچ ای	35-13 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔
3	ایس ایچ ای (BPS-15)	ایس ایچ ای	35-11 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔
4	ٹی ٹی (TT) (BPS-15)	ایس ایچ ای	35-11 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔
5	ایس ایچ ای (AT) (BPS-15)	ایس ایچ ای	35-19 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔
6	پرائمری سکول ٹیچر (PST) (BPS-12)	ایس ایچ ای	35-19 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔
7	ٹی ٹی (TT) (BPS-11)	ایس ایچ ای	35-20 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔
8	آئی ٹی ایس (DIT) (BPS-07)	ایس ایچ ای	35-19 سال	(i) کسی بھی تسلیم شدہ تعلیمی ادارہ سے بی اے پاس کیا جائے۔ (ii) ایس ایچ ای کے بعد 9 ماہ کی لازمی نوڈیٹنگ سے قبل درخواست دینا۔

18

Annex 18

1- سیکرٹریٹ نہریہ ETEA=100 نمبر

تعمیراتی سال	تعمیراتی سال	تعمیراتی سال
20x	20x	5x
20x	20x	5x
20x	20x	5x
10x	10x	5x

1- سیکرٹریٹ نہریہ ETEA=100 نمبر

تعمیراتی سال	تعمیراتی سال	تعمیراتی سال
30x	20x	15x
30x	20x	15x
30x	20x	15x

**دور نامہ کی شرائط:**

1. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

2. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

3. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

4. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

5. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

6. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

7. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

8. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

9. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

10. درخواست دہندگان کو اپنی شناختی تصویر مندرجہ ذیل اسماں پورہ کورسز کے لیے منسلک کرنا۔

www.khyberpakhtunkhwa.gov.pk

Say no to Corruption/Drugs

INF(P)4821

Attested

Attested

The Honourable Secy Edu Distt.  
ICP Peshawar.

Subject: Appeal for release of pay stopped  
without any logical reason/illegal

R/W, with great respect it is brought into your  
kind notice that our pays were stopped without  
any logical reason/illegal. We have already lodged  
appeal to Director Edu merged Distt. The DE(M) Distt  
was kind enough and issued order vide No 1666  
dt 30/1/2019 and No 2149-51 dt 7/2/19. (Copy attached)  
The District Edu officer conducted enquiry in this  
regard (copy attached). After enquiry Bills were prepared  
and submitted to the Distt. Accounts officer, but returned  
due to some observation, then the same was removed  
and resubmitted to the DAO office. (Copy attached)  
The Ex DAO stopped the process and we filed appeal  
to AG ICP. The AG ICP was kind enough and issued  
direction to process the claim. (Copy attached)

When a new DEO was posted and stopped all the  
lengthy correspondence without any legal reason.

Therefore it is humbly requested in your gracious  
honour that a necessary order may kindly be  
passed do to DEO North for release of salaries  
without stopped by the Ex DEO, for which we are strugg-  
ling for the last year.

Dated 11/8/2019

Copy to the

- (1) The worthy AG ICP Peshawar.
- (2) The DE(M) Distt ICP
- (3) Distt. Accounts officer North

Yours obediently  
Rajiv Ragiapst and others.

SO (PE)

ATTESTED

11/8

Please ask  
Report from DEO  
Concerned.

Attended



List of appellants are attached.

- Bushra ————— Bushra Qader. - 2
- Zabunisa ————— Zabun Nisa - 3
- Mr. Shahid ————— Mohd Shahid - 4
- Ijaz Reh ————— Ijaz ur Rehman. - 5
- Asadullah ————— Asadullah. - 6
- Imran ————— Imranullah - 7
- Tasim ————— Tasim - 8
- Sawal ————— Sawal Haider. - 9
- Tebroela ————— Tebroela - 10
- Samia ————— Samina Naz - 11
- Abid ————— Abid. Rehman - 12
- Razia ————— Razia - - 13
- Nor Zahid ————— Nor Zahid. - 14
- A. Qayum ————— Abdul Qayum - 15
- Uma ————— Uma Rashid. - 16
- Jahanzeb ————— Jahanzeb - 17

Attested  
✓

Attested  
✓

Attested  
✓

Amr N (20)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block "A" Opposite M PA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223587

No. SO(PE)/E&SED/5-1/ Gen Misc/2022  
Dated Peshawar the August 11<sup>th</sup>, 2022

To

The District Education Officer (Male)  
District North Waziristan.

Subject: -

APPEAL FOR RELEASE OF PAYS IN R/O NASIRUDDINTT RUOIA  
PST AND OTHERS

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application submitted by Mr. Nasiruddin TT and others along with its enclosure, for further necessary action.

2 You are therefore, directed to resolved the issued under intimation to this office.

Encl. As above.

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PE)

Copy forwarded to the PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

SECTION OFFICER (PE)

11/8/22

*The Ex. Comm. The Member,  
provide the already proper  
recommendation for award  
Submission to the Quarter Command  
that is reported and submit to the  
for signature.  
8/2/22*

*Attested*

ATTESTED

Annex 0 21

To

The District Education Officer,

North Waziristan District.

Subject: PHYSICAL VERIFICATION FOR IMPLEMENTATION OF DIRECTOR EDUCATION MERGED DISTRICT

Kindly refer your office No30410-12 dated 23-07-2022 on the subject noted that and to state in pursuance of director Education FATA order No. 1666-68 dated 30-01-2019 on the subject noted above. We the following committee members thoroughly checked and verified the teachers whose salaries were stopped without any cogent reason and they are performing their duties regularly to the entire satisfaction of their superiors and they are regular employees of this department. In view of the above facts we the enquiry committee members recommended for releasing the outstanding salaries of the following teachers.

Report is submitted for further necessary action being low paid Government servants.

- |   |  |
|---|--|
| 1. Ruqia PST GGPS Adam Khan Kot             | 11. Jabreia PST GGPS Shehzad Gul Kot         |
| 2. Bushra Qadar PST GGPS Akhtar Nawaz Kot   | 12. Samia Naz PST GGPS Muhammad Noor Din Kot |
| 3. Zaiba Nisa PST GGPS Ghulam Sher Khan Kot | 13. Noor Zahid PST GPS Muhammad Aslam Kot    |
| 4. Muhammad Shahid PST GPS Awal Khan Kot    | 14. Abdul Qayum PST GPS Inayat Khan Kot      |
| 5. Ijaz Ur Rehman PST GPS Gul Rauf Khan Kot | 15. Umra Rashid PST GGPS Rasool Khan Kot     |
| 6. Asad Ullah PST GPS Zar Gul Kot           | 16. Razia PST GGPS Zaindad Kot               |
| 7. Imran Ullah PST GPS Muhammad Aslam Kot   | 17. Abid Rahman PST GPS Darpa Khel           |
| 8. Taskin PST GGPS Rahmat Ullah Kot         | 18. Janzaba PST GGPS Zainda Kot              |
| 9. Amra haidar PST GGPS Muhammad Amin Kot   |  |
| 10. Sawal Haidar PST GGPS Sher Dad Kot      |  |

Enquiry Committee Members:

1. Sami ullah V/Principal GHSS Idak:
2. Habib Ullah H/Master GHS Tall Village:
3. Mr. Shanabaz Khan S/Clerk DEO Office:
4. Mr. Arbab Khan J/Clerk DEO Office:

*Alleshid*

*[Signature]*

*[Signature]*

*[Signature]* R/DDESB

The above physical verification report is correct and hence verified by the enquiry officers and submitted for further action please.

*[Handwritten notes]*

*[Signature]*

*[Handwritten notes]*

*[Signature]*

*[Signature]*

کوریٹیشن کروہ ٹریڈرسٹریٹ لاہور

مورخہ	۲۰۰۲ء منجانب
مقدمہ	بنام ریجنل ٹریڈرسٹریٹ لاہور
دعویٰ	
جرم	

پاعث تحریر آنکے

مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ ان مقام کے لئے ہارکس سلم ایمر و مہندہ ایمر مسابا مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی مکمل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو راضی نامہ و مقرر ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق ذرا اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مستحوی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے مکمل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے سخت وکیل صاحب موصوف ہوں گے۔ نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہوگا تھانہ باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی مقدمہ مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Razia

المرقوم ۱۱/۱۱/۵۲۲ ہا نومبر ۲۰۰۲ء

العبد گواہ شد العبد

Ajma ul Nazim Adolati

Yasir Saleem Adolati