

01.09.2022

Clerk of learned counsel for the appellant present.  
Mr. Asif Masood Ali Shah learned Deputy District  
Attorney for the respondents present.

Learned Member (Judicial) Mrs. Rozina Rehman is  
on leave, therefore, arguments could not be heard.  
Adjourned. To come up for arguments on 20.10.2022  
before the D.B.




(Salah-Ud-Din)  
Member(J)

20<sup>th</sup> Oct., 2022

Junior to counsel for the appellant present, Mr. Naseerud  
Din Shah, Asstt. A.G for the respondents present.

Request for adjournment was made on behalf of learned  
senior counsel for the appellant due to his engagement before  
the Hon'ble High Court today. Adjourned. To come up for  
arguments on 19.12.2022 before D.B.



(Fareeha Paul)  
Member (E)

(Kalim Arshad Khan)  
Chairman

20<sup>th</sup> June, 2022

Counsel for the appellant present. Mr. Naseer Ud Din Shah,  
Asstt. AG for the respondents present.

Learned counsel for the appellant submits that during pendency of this appeal, the appellant had been dismissed from service and for the said cause the appellant had filed another appeal No. 7870/21 which was fixed for 14.07.2022. He requested that the instant appeal may be clubbed with the same. Order accordingly. To come up for further proceedings on 14.07.2022 before the D.B.


  
**(Fareeha Paul)**  
Member(E)


  
**(Kalim Arshad Khan)**  
Chairman

14.07.2022

Junior of learned counsel for the appellant present.  
Mr. Naseer-ud-Din Shah, Assistant Advocate General for  
the respondents present.

Junior of learned counsel for the appellant requested  
for adjournment on the ground that learned counsel for  
the appellant is not available today. Adjourned. To come  
up for arguments on 01.09.2022 before the D.B.

  
**(Rozina Rehman)**  
Member (J)

  
**(Salah-ud-Din)**  
Member (J)

14.09.2021

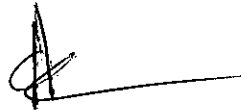
Junior to counsel for appellant present.

Muhammad Adeel Butt learned Additional A.G for respondents present.

Reply on behalf of respondents is still awaited. Learned A.A.G made a request for adjournment in order to submit reply/comments. Request is accorded with direction to positively submit the same within 10 days in office. To come up for arguments on 13.01.2022 before D.B.



(Rozina Rehman)  
Member (J)



Chairman

13.01.2022

Junior to counsel for the appellant present.

Mr. Kabirullah Khattak, Addl. AG alongwith Ghulam Qadir, Superintendent and Hameed Ullah Senior Clerk for respondents present. Reply/comments on behalf of respondents have already been submitted through office which is placed on file. To come up for rejoinder if any, and arguments before the D.B on 11.05.2022.



(Atiq-Ur-Rehman Wazir)  
Member (E)

11-5-22

*Proton DB not available in case is  
adjourned on 25-7-22*

*Atiq-Ur-Rehman Wazir*

25.06.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all legal objections including the limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 10.08.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

An application for interim relief for release of salary has also been submitted alongwith the appeal. Notice of the application be also issued to the respondents. If the validity of appointment of the appellant is not disputed and she is performing her duty, her current salary be released as a matter of interim relief subject to final decision of the appeal.

  
Chairman

10.08.2021

Since, 1<sup>st</sup> Moharram has been declared as public holiday, therefore, case is adjourned to 14/9/2021 for the same as before.

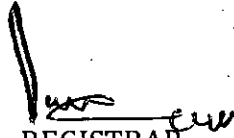


  
Reader

Form- A

FORM OF ORDER SHEET

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

Case No.- 4816 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/04/2021	<p>The appeal of Mst Memona Asma resubmitted today by Mr. Zartaj Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	27/05/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>07/06/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	07.06.2021	<p>The Worthy Chairman is on leave, therefore, case to come up for preliminary hearing on 25.06.2021 before S.B.</p> <p style="text-align: right;"> Reader</p>

The appeal of Mst. Memoona Asma PST GGPS Siab Kohat received today i.e. on 01/04/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of letter dated 10/2/2021 mentioned in para-8 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 631 /S.T,

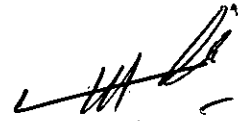
Dt. 02/04 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Zartaj Anwar Adv. Peshawar.

*Six*

*Re Submitted files. Completion  
Please put in the Court.*

  
*Adl*  
13/4/2021.

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

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

**Memoona Asma**, Primary School Teacher (PST) Government Girls  
Primary School, Siab Kohat.

(Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education, Khyber Pakhtunkhwa and others.

(Respondents)

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Appellant

Through

**ZARTAJ ANWAR**

Advocate High Court

Office FR, 3 Forth

Floor Bilour Plaza

Peshawar Cantt.

Cell: 0331-9399185

Email: [Zartaj9@yahoo.com](mailto:Zartaj9@yahoo.com)

**BEFORE THE KHYBER PAKHTUNKWA****SERVICE TRIBUNAL PESHAWAR**Khyber Pakhtunkhwa  
Service Tribunal4816  
Appeal No. \_\_\_\_\_/2021

Diary No. 4527

Dated 01/04/2021

*Memoona Asma*, Primary School Teacher (PST) Government  
Girls Primary School, Siab Kohat.**(Appellant)****VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Kohat.
4. District Accounts Officer, Kohat

**(Respondents)**

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against not releasing the salary of the appellant w.e.f October 2018 till date and onwards, the appellant is still performing her duties, and against which the departmental appeal dated 16.12.2020, which is not yet responded despite the lapse of 90 days statutory period.

Prayer in appeal**Filed to-day**Registrar  
01/04/2021Re-submitted to -day  
and filed.Registrar  
12/4/2021

On acceptance of this appeal the respondents may kindly be directed to release the salaries of the appellant w.e.f October 2018, till date and onward as the petitioner till date regularly performing her duties, further the reluctance on the part of the respondents by not releasing the monthly salaries of the appellant is against the law and against the fundamental rights secured & guaranteed under the Constitution of Islamic Republic of Pakistan 1973, thus she is entitled for salaries with all back benefits and arrears,



Respectfully submitted,

1. That the appellant is the law abiding citizen and the permanent resident of the District Kohat. *(Copy of the CNIC is attached as annexure A).*
2. That the respondent department advertised various post including the post of Primary School Teacher (PST) BPS-12 through NTS, being fit and eligible the appellant applied for the said post after fulfilling all the legal and codal formalities, the appellant was called for the written test in which the appellant duly appeared, merit list was prepared in which the total score of the appellant was 94.5 and the name of the appellant was brought in the merit position for appointment. *(Copies of the educational documents are attached as annexure B)*
3. That the appellant was initially appointed as Primary School Teacher in Government Girls Primary School Siab Kohat vide office order dated 03.05.2017 and started her duty at the GGPS Siab Kohat. *(Copies of the appointment order dated 03.05.2017 and charge report are attached as Annexure C & D).*
4. That it is pertinent to mention here that ever since her appointment, the appellant has performed her duties as assigned, with great zeal and devotion without any complaint whatsoever regarding her performance.
5. That in the meanwhile one Mst Asma BiBi filed a writ petition *2647 P/2017* title Asma Bibi vs Govt of KPK, before the Honourable Peshawar High Court Peshawar, in which the petitioner challenge the appointment of the appellant. *(Copy of the Writ Petition is attached as annexure E).*
6. That during the pendency of the writ petition no *2647 P/2017* title Asma Bibi vs Govt of KPK, there is no such order issued by the honourable court while restraining the appellant from performing her duties neither passed any order regarding stoppage of salary, furthermore the respondent admitting that the appellant still performing her duties. but astonishingly the respondents stopped the salary of the appellant without any reason and justification.

7. That the writ petition no ~~2447-P/2012~~ title Asma Bibi vs Govt of KPK, was dismissed by the Honourable Peshawar High Court Peshawar in non-Prosecution/Default, despite of this the respondents are not releasing the salaries of the appellant which is illegal, unlawful and against the fundamental rights. *(Copy of the order sheet is attached as annexure F).*
8. That being aggrieved from the illegal act of the respondents, the appellant filed a departmental appeal on 16.12.2020, which is not yet responded by the respondents even after laps of the statutory period of 90 days, the respondents while processing the case of the appellant, admits that the appellant performing her duties regularly, *(Copy of the departmental appeal and letter dated 10.02.2021 are attached as annexure G & H).*
9. That the appellant prays for the acceptance of her appeal inter alia on the following grounds:

**GROUND OF SERVICE APPEAL**

- A. That the appellant has not been treated in accordance with law, hence her rights secured and guaranteed under the law are badly violated.
- B. That the appellant has never been proceeded against, nor any charge sheet or show cause notice has ever been served upon her, moreover the services of the appellant has not been terminated thus she is entitled for the release of her salary and also entitled for back benefits.
- C. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice, salary of the appellant has been stopped without any reason and justification.
10. That during the pendency of the writ petition no ~~2447-P/2012~~ title Asma Bibi vs Govt of KPK, there is no such order issued by the honourable court while restraining the appellant from performing her duties neither passed any order regarding stoppage of salary, furthermore the respondent admitting that the appellant still performing her duties. but astonishingly the respondents stopped the salary of the appellant without any reason and justification.

- D. That the writ petition no. 2017/2017 title Asma Bibi vs Govt of KPK, was dismissed by the Honourable Peshawar High Court Peshawar in non-Prosecution/Default, despite of this the respondents are not releasing the salaries of the appellant which is illegal, unlawful and against the fundamental rights.
- E. 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.
- F. That the appellant was appointed by the competent authority, she duly took over charge of her post and performed her duties since 2017 and have received salaries against her post thus valuable rights has been created in her favour and the same cannot be undone or snatched away illegally.
- G. That the appellant is continuously approaching the concerned authorities for releasing of her salaries, but the respondents turned a deaf ear.
- H. That not releasing salary of the appellant is also violation of section 4 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, besides violation of her fundamental rights guaranteed and secured to her under the Constitution of Pakistan, 1973.
- I. That the appellant throughout agitated the matter of the release of her salary and continuously approached the Respondent department, however her salary has not been released till date.
- J. That the appellant belongs to a poor family and has a large family dependent upon her, moreover the appellant have no other source of income, due to the withholding of her salary her whole family is thus suffering.
- K. That the appellant seeks permission of this Honourable court to rely on additional grounds at the time of hearing of the appeal.

It is therefore prayed that On acceptance of this appeal the respondents may kindly be directed to release the salaries of the appellant w.e.f October 2018, till date and onward as the petitioner till date regularly performing her duties, further the reluctance on the part of the respondents by not releasing the monthly salaries of the appellant is against the law and against the fundamental rights secured & guaranteed under the Constitution of Islamic Republic of Pakistan 1973, thus she is entitled for salaries with all back benefits and arrears.

*[Signature]*  
Appellant

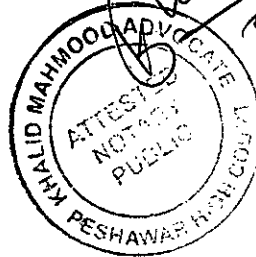
Through

*[Signature]*  
**ZARTAJ ANWAR**  
Advocate, Peshawar

*[Signature]* & *[Signature]*  
**IMRAN KHAN**  
Advocate, Peshawar

**AFFIDAVIT**

I, **Memoona Asma**, Primary School Teacher (PST) Government Girls Primary School, Siab Kohat, do hereby solemnly affirm and declare on oath that the contents of the above noted appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



*[Signature]*  
Deponent

HP301-7887818-4

6

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

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

***Memoona Asma***, Primary School Teacher (PST) Government Girls  
Primary School, Siab Kohat.

**(Appellant)**

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education, Khyber Pakhtunkhwa and others.

**(Respondents)**

**APPLICATION FOR RELEASING THE CURRENT  
SALARY OF THE APPELLANT.**

Respectfully Sheweth:

1. That the applicant was initially appointed as Primary School Teacher in Government Girls Primary School Siab Kohat vide office order dated 03.05.2017 and started her duty at the GGPS Siab Kohat and since her appointment the appellant performing her duties with great zeal and devotion and to the entire satisfaction of her superiors.
2. That the applicant has never been proceeded against, nor any charge sheet or show cause notice has ever been served upon her, moreover the services of the appellant has not been terminated thus she is entitled for the release of her salary and also entitled for back benefits.
3. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice, salary of the applicant has been stopped without any reason and justification.
4. That during the pendency of the writ petition no ~~2017/2021~~ title Asma Bibi vs Govt of KPK, there is no such order issued by the honourable court while restraining the appellant from performing her duties neither passed any order regarding stoppage of salary, furthermore the respondent admitting that the applicant still

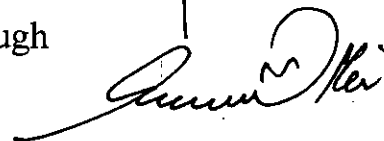
performing her duties. but astonishingly the respondents stopped the salary of the appellant without any reason and justification.

5. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice salary of the applicant has been stopped.
6. That the applicant belongs to a poor family and has a large family dependent upon her, moreover the applicant have no other source of income, due to the withholding of her salary her whole family is thus suffering.

It is therefore most humbly prayed that on acceptance of this application the respondents may kindly be directed to release the current salary of the applicant.

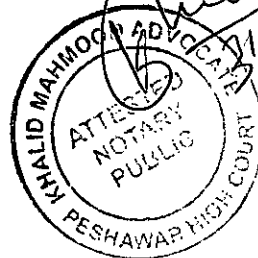
  
Applicant

Through

  
**ZARTAJ ANWAR**  
Advocate, Peshawar

### AFFIDAVIT

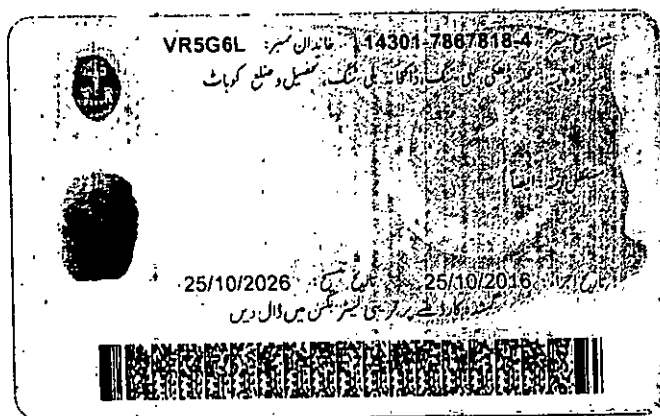
I, *Memoona Asma*, Primary School Teacher (PST) Government Girls Primary School, Siab Kohat. , do hereby solemnly affirm and declare on oath that the contents of the above noted application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



  
-3-21 M  
Dependent

8

ANNEX. "A"



**ATTESTED**

*[Handwritten signature]*

18387

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION

9 ANNEX "B"



## PESHAWAR

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
Session: 2002 (Annual)

Name: Maimoona Asma

Father's Name: Mustafa Kamal

Roll No 12809

Subject	Marks	MARKS OBTAINED			
		Theory	Practical	Total	In Words
1. English	150	-	-	68	Sixty-Eight
2. Urdu	150	-	-	89	Eighty-Nine
3. Islamiyat (Comp)	75	46	-	46	Forty-Six
4. Pakistan Studies	75	40	-	40	Forty Only
5. New/Riazi	100	37	-	37	Thirty-Seven
6. G. Science	100	63	-	63	Sixty-Three
7. Elements Of H. Economics	100	62	-	62	Sixty-Two
8. Islamic Studies	100	73	-	73	Seventy-Three

Total 850

478-C Four Hundred Seventy-Eight Only

Remarks

IS.EHE,

Checked By: \_\_\_\_\_

Date: 29-06-2002

Note: Error / Omission are excepted:

Khakeer and BRAINS Software Enterprise (KBSoft)

Controller of Examinations

**ATTESTED**



S.No. 236054

Roll No. 12809

# Board of Intermediate and Secondary Education

Mezhar N.M.J.H. Pakistan

Secondary School Certificate Examination

SESSION 2002 -- ANNUAL

(Humanities Group)

This is to Certify that Maimoona Asma Son / Daughter of Mustafa Kamal  
and a student of Govt. Girls High School, Billitang, Kohat has passed the Secondary School Certificate  
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March/April, 2002 as a Regular  
candidate. He / She obtained 478 Marks out of 850 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiyat
4. Pakistan Studies
5. Mathematics
6. General Science
7. Islamic Studies
8. Elements of Home Economics

He / She has been awarded Grade C on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form March 3, 1986

Asstt Secretary

**ATTESTED**

Secretary

This certificate is issued without alteration or erasure.

11

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION KOHAT

## DETAILED MARKS CERTIFICATE Intermediate Examination Humanities Group



Sr.No. 16547

Part - II

Session 200 h (Annual/Supplementary)

Name Mamoona Asma

Father's Name Mustafa Kamal Roll No. 39438

SUBJECT	Subjects Marks	Marks Obtained			
		Part-I	Part-II	Total In	
				Figures	Words
1. English	200			73	
2. Urdu	200			122	
3. Islamic Education	50			66	
4. Pakistan Studies	50			98	
5. <u>14</u>	200			107	
6. <u>ci</u>	200			123	
7. <u>15</u>	200				
Total	1100			589	

Note: Errors/Omissions excepted

Total Marks in Words Five H-7 C only time

Date 1/1

Controller of Examinations  
Board of Intermediate & Secondary Education  
KOHAT.

Prepared by: [Signature]

Checked by: [Signature]

**ATTESTED**  
[Signature]

S.No.KB 5457

Roll. No. 39438

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

12

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



**KOHAT**  
(N.W.F.P. Pakistan)

**INTERMEDIATE EXAMINATION**

HUMANITIES GROUP  
SESSION: 2004 (ANNUAL)

THIS IS TO CERTIFY THAT Mamoona Asma

Son/Daughter of Mustafa Kamal

and a student of Govt Girls Higher Secondary School Babri Banda Kohat

Registered No 9-BK/GBBK-2002 has passed the *Intermediate Examination*

of the Board of Intermediate & Secondary Education, Kohat held in May, 2004

as a Regular candidate. He / She obtained 589 marks out of 1100 and has been placed in C Grade Representing Good

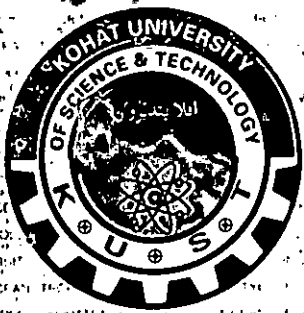
The Examination was taken as a whole / in parts.

  
Asstt Secretary

  
Secretary

*This certificate is issued without alteration of erasure.*

**ATTESTED**  

Serial No. 049844

# Kohat University

## of Science & Technology, Kohat (Pakistan)

### Detailed Marks Certificate

**Bachelor of Arts (B.A) Part-II, Annual Examination, 2011**

Name: Maimona Asma Roll Number: 30149  
 Father's Name: Mustafa Kamal Registration Number: 2008-PCKU-271

Certified that the candidate secured the following marks and has been placed in 2nd Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figures	In Words
English Compulsory	75	30	Thirty
Urdu	75	42	Forty-Two
Islamic Studies	75	46	Forty-Six
Pak Studies	40	19	Nineteen
<b>Part-I Marks</b>	<b>285</b>	<b>176</b>	<b>One Hundred Seventy-Six</b>
<b>Total</b>	<b>550</b>	<b>313</b>	<b>Three Hundred Thirteen</b>

The examination was taken in parts  
 To pass 40% marks in each subject (Written & Practical Separately) and  
 15% marks in aggregate.

Result Declared on: 29-Aug-2011

**CONTROLLER OF EXAMINATIONS**  
 Kohat University of Science and Technology  
 Kohat, Pakistan.

**ATTESTED**

~~ATTESTED~~

Serial No. **006969**

Roll No. **30149**

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. **2008-PCKU-271**

# Kohat University of Science & Technology, Kohat (Pakistan)

Session **ANNUAL, 2011**

**MADONA ASMA** DAUGHTER OF **MUSTAFA MAAL**

of \_\_\_\_\_ having passed the prescribed

examination held in **JUNE** **2011**, is this day admitted by

The Kohat University of Science & Technology, Kohat

to the Degree of

**Bachelor of Arts**

in the **SECOND** Division

The Examination was taken as a whole / in parts

Controller of Examinations

Countersigned

**ATTESTED**



*Nyayans*

Vice Chancellor

Result declared on **AUGUST 29, 2011**

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## PROVISIONAL RESULT CARD



Serial No 62655

Roll No. 15

BA586178

Name MAIMOONA ASMA

Registration No.

06NKT0126

Final Semester

SPR-2016

Father's Name MUSTAFA KAMAL

Address ABDUL WAHAB HARD WARE SERVICE MANID BILLI  
TANG

Tehsil KOHAT

District KOHAT



has successfully completed **MASTER OF SCIENCE**  
**(PAKISTAN STUDIES)**

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 14	0538	GENESIS OF PAKISTAN MOVEMENT	100	66
AUT- 14	4655	GEOGRAPHY OF PAKISTAN-I	100	69
AUT- 14	4656	GEOGRAPHY OF PAKISTAN-II	100	56
AUT- 14	4657	PAKISTANI LANGUAGES & LITERATURE-I	100	61
AUT- 14	4659	PAKISTANI LANGUAGES & LITERATURE-II	100	56
SPR- 15	0537	IDEOLOGICAL FOUNDATIONS OF PAKISTAN	100	55
SPK- 15	4659	ECONOMIC DEVELOPMENT IN PAKISTAN-I	100	66
SPR- 15	4660	ECONOMIC DEVELOPMENT IN PAKISTAN-II	100	64
SPR- 15	4661	FOREIGN POLICY OF PAKISTAN-I	100	71
SPR- 15	4662	FOREIGN POLICY OF PAKISTAN-II	100	70
AUT- 15	0541	SOCIAL CHANGE	100	61
AUT- 15	4663	PAKISTANI SOCIETY & CULTURE-I	100	59
AUT- 15	4664	PAKISTANI SOCIETY & CULTURE-II	100	66
AUT- 15	4665	RESEARCH METHODS-I	100	56
AUT- 15	4666	RESEARCH METHODS-II	100	60
SPR- 16	0545	POLITICAL PARTIES & PRESSURE GROUPS IN	100	69
SPR- 16	4667	POLITICAL AND CONSTITUTIONAL	100	62
SPR- 16	4668	POLITICAL AND CONSTITUTIONAL	100	62
SPR- 16	4669	SOCIAL THEORY-I	100	65
SPR- 16	4670	SOCIAL THEORY-II	100	65

**ATTESTED**  
*[Signature]*

Credit Hours 60

Total Marks/Obtained

2000 / 1260

Result Declared on MARCH 17, 2017

Percentage/Grade

63 / B

Date of Issue APRIL 11, 2017

*[Signature]*  
**Controller of Examinations**

**Disclaimer:**

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

16

# Allama Iqbal Open University Islamabad



Serial No. 13636

Certified that Mr. / Ms. MAIMOONA ASMA

Son / Daughter of MUSTAFA KAMAL

Registration No: 06NKT0126

Roll No: BA586178

having completed the prescribed requirements in semester  
SPRING 2016 is awarded the degree of:

*Master of Science*

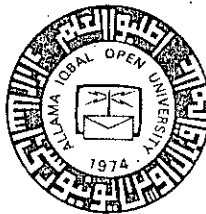
**PAKISTAN STUDIES**

He / She has secured 63 % marks and has been placed in B grade.

**ATTESTED**

*M. Aslam*  
CONTROLLER OF EXAMINATIONS

Result declared on: March 17, 2017



*S. M. Iqbal*  
VICE-CHANCELLOR

ISLAMABAD. DATED: November 07, 2017

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



## PROVISIONAL RESULT CARD

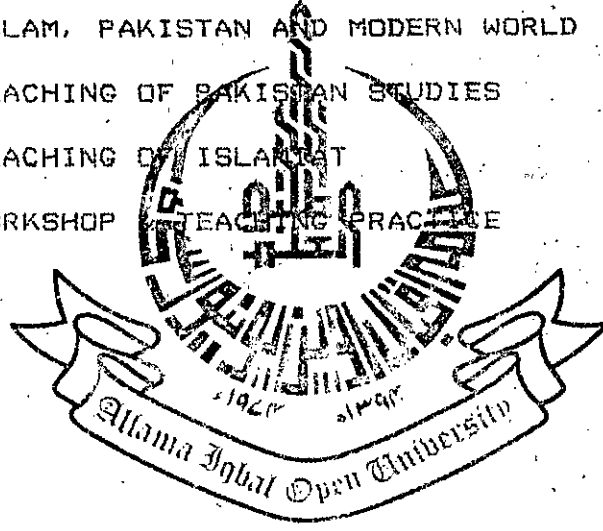
Serial No. 505676

Name MAIMOONA ASMA  
 Father's Name MUSTAFA KAMAL  
 Address D. O MUSTAFA KAMAL C. O ABDUL WAHAB HARD  
 WAR E SERVICE BILLITANG P. O BILLITANG  
 Tehsil KOHAT  
 District KOHAT  
 has successfully completed BACHELOR OF EDUCATION (B. ED)

Roll No. AP643426  
 Registration No. 06NKTO126  
 Final Semester SPR-2013

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 12	0512	PERSPECTIVES OF EDUCATION	100	75
AUT- 12	0513	SCHOOL ORGANIZATION	100	68
AUT- 12	0514	EVALUATION, GUIDANCE & RESEARCH	100	56
AUT- 12	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	73
AUT- 12	0651	ENGLISH (COMPULSORY)	100	81
AUT- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	75
SPR- 13	0517	TEACHING OF PAKISTAN STUDIES	100	63
SPR- 13	0654	TEACHING OF ISLAM AT	100	64
SPR- 13	0655	WORKSHOP TEACHING PRACTICE	100	92



CREDITS: 6

Total Marks / Obtained

900 / 647

Result Declared on DECEMBER 26, 2013

Percentage / Grade

72 A

Date of issue JANUARY 07, 2014

**Controller of Examinations**

**Disclaimer:**

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on the candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

**ATTESTED**



18

# Allama Iqbal Open University Islamabad



Serial No. 251126

Certified that Mr. / Ms. **MAIMOONA ASMA**

Son / Daughter of **MUSTAFA KAMAL**

Registration No: **06NKT0126** Roll No: **AP643426**

having successfully completed the prescribed requirements  
in semester **SPRING 2013** is awarded the degree of

## Bachelor of Education (B.Ed)

He/She has secured **72** % marks and has been placed in **A** grade.

  
CONTROLLER OF EXAMINATIONS



  
VICE-CHANCELLOR

Result declared on: **December 26, 2013**

Date of Issue: **January 06, 2017**

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

**ATTESTED**

Serial No.  
140792

**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**PROVISIONAL RESULT CARD**



Name MAIMOONA ASMA  
Fathers's Name MUSTAFA KAMAL  
Address D.O MUSTAFA KAMAL C.O ABDUL WAHAB HARD WAR  
E SERVICE BILLITANG P.O BILLITANG  
Tehsil KOHAT  
District KOHAT

19  
Roll No. T645090  
Registration No. 06NKT0126  
Final Semester AUT- 2006

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	69
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	63
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	67
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	67
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	65
AUT- 06	0617	TEACHING OF URDU	100	68
AUT- 06	0618	TEACHING OF MATHEMATICS	100	66
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	71
AUT- 06	0620	TEACHING OF ISLAMIAH & SOCIAL STUDIES	100	74



CREDITS : 5

Total Marks / Obtained 900 / 610

Result Declared on SEPTEMBER 20, 2007

Percentage / Grade 68 B

Date of issue SEPTEMBER 25, 2007

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

*[Signature]*  
Controller of Examinations

**ATTESTED**

20

# Allama Iqbal Open University Islamabad

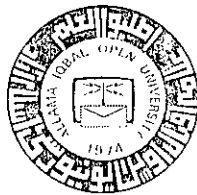


Serial No. 246732

Certified that *Mr/Ms* **MAIMOONA ASMA**  
*Son/Daughter of* **MUSTAFA KAMAL**  
*Registration No* **06NKT0126** *Roll No* **T645090**  
*Semester* **AUTUMN 2006** *having met all the requirements under*  
*the semester system is this day awarded the*

## Primary Teaching Certificate

*He/She has secured* **68 %** *marks*  
*and has been placed in* **B** *grade*



Result declared on: **September 20, 2007**

Date of issue: **October 10, 2016**

*[Signature]*

*Mamun*  
Controller of Examinations

Note: This certificate is issued without alteration/erasure.  
The detail of courses is overleaf.

**ATTESTED**  
*[Signature]*

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
613	PRINCIPLES OF EDUCATION	69
614	EDUCATIONAL PSYCHOLOGY	63
615	SCHOOL ORGANIZATION & MANAGEMENT	67
616	SCHOOL COMMUNITY & PRACTICAL ARTS	67
617	TEACHING OF URDU	68
618	TEACHING OF MATHEMATICS	66
619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	71
620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	74
611	PRACTICAL WORKSHOP & TEACHING PRACTICE	65

Total credit hours

XXX

Obtained / Total marks

610 / 900

Total credits AIOU

5

Cumulative grade point average

XXX

First semester: **SPRING 2006**

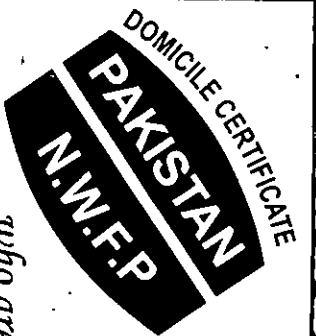
Final semester

**AUTUMN 2006**

Grading Scheme

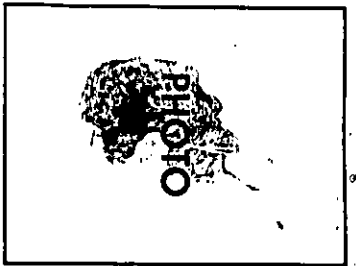
80% and above:	A+ grade
70% to 79%	A grade
60% to 69%	B grade
50% to 59%	C grade
40% to 49%	D grade
Below 40%	Fail

*M. Khan*  
Controller of Examinations



# DOMICILE CERTIFICATE

I declare that I am born of parents 21 who are permanently domiciled in N.W.F.P. and having been born in this province.



Mr. / Miss ✓ Maimona Asma S/o, D/o, W/o Mustafa Kamal

was born at Distt. Kohat N.W.F.P. Tehsil Kohat

Village / Mohallah Dhaki Billitang

Dated 3.2.2008 Sign. Maimona Asma

In the pursuance to the above declaration Dated 3/2/08 Filed by Maimona Asma

I have been satisfied through verification that the said is born of parents who are permanent residents of Distt. \_\_\_\_\_

Tehsil Kohat N.W.F.P. and having been born within it.



It is hereby certified according to the above declaration is true.

District Officer Revenue & Estate

No. \_\_\_\_\_ Date 21.2.08

Month Feb Year 2008

Deputy Distt. Officer Revenue & Estate

**ATTESTED**

جناب عالی!

میں نے اس کے ..... تقدیر کی جاتی ہے کہ کسی اسماعیہ

میں نے اس کے ..... سائن محلہ / گاؤں اشہر

صوبہ ..... کا / کی پیدائش اور مستقل رہائش باشندگان میں اور میں ان کو ذاتی طور پر جانتا ہوں۔ کہ اس کے والدین اشہر بھی علاقہ مذکورہ کے پیدائش اور مستقل رہائش باشندگان میں اور یہ ایک اچھے پاکستانی شہری ہیں۔

ALLIANCE  
Aisling Rehan  
Union Council Bili Yang  
68, Court No. 14901-62/9728-7

تقدیر کنندہ کا نام .....  
**TESTED**

ہمدہ / حیثیت

دستخط / مہر اور تاریخ

MRS. HAN-BO-DIN  
Eden Council Bili Yang  
Kob...

دستخط / مہر اور تاریخ

**APPOINTMENT**

*22 Annex-11*

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Primary School Teacher (PST) School based in BPS-1, (Rs.11140-800-35140) @ Rs. 11140/- P.M fixed plus usual allowances as admissible under the rules on adhoc basis or Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

Sl#	Name & Father Name	CNIC No	UC	Score	Name of School where posted	Remarks
1	Miss Noor Barkat D/O Barkat Ali	14301-0308517-4	Alizai	102.61	GGPS No.2 Sositang	AVP
2	Miss Tabassum D/O Naimat Ali	14301-3094579-8		100.35	GGPS Khawaja Khizar	AVP
3	Anifa Ambar D/O Abdul Waheed Khan	14301-9970361-6	Bahadar Kot	126.42	GGPS No.1 Sheikhan	AVP
4	Sidra-lul-Muntaha D/O Faqir Muhammad	14301-5535061-8		120.78	GGPS Kamar Mola	AVP
5	Safia Bibi D/O M. Razzaq	14301-5556184-8	Bililang	120.22	GGPS Dhok Akbar Jan	AVP
6	Noor-e-Aliqa D/O Inayat ullah	14301-0423569-4		115.51	GGPS Siab	AVP
7	Nazia Bibi D/O Muhammad Raziq	14301-5582377-4		103.03	GGPS Dhok Akbar Khan	AVP
8	Maimoona Humayun D/O Muhammad Humayun	42101-0920331-0		100.60	GGPS Nari Kak	AVP
9	Madiha Shahab D/O Shahab ud Din	14301-7909757-8		95.94	GGPS Gandyali Payan	AVP
10	Noor-ul-Saba D/O Muhammad Naeem Khan	14301-6792411-4		95.13	GGPS Siab	AVP
11	Maimoona Asma D/O Mustafa Kamal	14301-7237812-4		94.05	GGPS Siab	AVP
12	Mehwish Resham Gul D/O Resham Gul	14301-6705917-2		93.97	GGPS Gandyali Payan	AVP
13	Sara Shabir D/O Shabir Ahmad	14301-5313150-0		91.32	GGPS Gandyali Payan	AVP
14	Urooba Shahab D/O Shahab ud Din	14301-6125795-6		91.04	GGPS Gandyali Payan	AVP
15	Nagina D/O Riaz ullah	14301-6791867-0	90.69	GGPS Dhok Jat Siab	AVP	
16	Javaria Noor D/O Inayat ullah	14301-5092119-6	90.12	GGPS Gandyali Payan	AVP	
17	Fozia Bibi D/O Fazal Rahim	14301-9433575-2	Chorlaki	110.45	GGPS Jabbar	AVP
18	Shomalia D/O Farid Gul	14301-7125995-0	Dhoda	119.05	GGPS Alind Banda	AVP
19	Abida Bibi D/O Anees Khan	14301-5253295-6	Gumbat	116.92	GGCMS Ghurzai Payan	AVP
20	Sabra D/O Noor-ul-Haq	14301-9454757-6		101.60	GGCMS Ghurzai Payan	AVP
21	Ghazala Bibi D/O Muhammad Zaman	14301-5205509-5		101.14	GGCMS Ghurzai Payan	AVP
22	Nabeela Gul D/O Muhammad Nazir	14301-5729518-8		98.95	GGPS Tulang Jadeed	AVP
23	Romana Bibi D/O Mughal Khan	14301-7833662-4	Khushal Garh	93.89	GGPS Tulang Jadeed	AVP
24	Ayesha Busra D/O Banaras Khan	14301-5203255-8		104.36	GGPS Parshai	AVP
25	Sidra Munaza D/O Noshewan Khaltak	54400-8775423-3		100.56	GGPS Parshai	AVP
26	Amina Kaisoom D/O Muhammad Khurshid	14301-5375809-2		98.53	GGPS Kamar	AVP
27	Abida Parveen D/O Abdul Waheed	14301-3239261-6		93.11	GGPS Resi Banda	AVP
28	Umm-e-Salma D/O Rehmat ullah	14301-9359087-0		87.74	GGPS Kamar	AVP

*out of 47  
14  
Not on the list  
in NO 1475*

QSMAT ULLAH KHAN  
Nazim VC-62  
Bililang II U.C Bililang

**ATTSTED**

*11/2/17*

S#	Name & Father Name	CNIC No	UC	Score	Name of School where posted	Remarks
29	Faima Majid D/O Abdul Majeed	14301-1170311-6	Muhammad Zai	108.43 Adj UC	GGCMS Banda Parachgan	AVP
30	Hifza Farhat D/O Farhat Raheem	14301-8067121-2		107.09 Adj UC	GGPS No.1 Muhammad Zai	AVP
31	Sadia Bibi D/O Ghulam Hassan	14301-8108832-8		101.55 Adj UC	GGPS No.1 Muhammad Zai	AVP
32	Arifa Urooj D/O Taj-ud-din	14301-5009407-6		101.48 Adj UC	GGCMS Banda Parachgan	AVP
33	Nafeesa Bibi D/O Muhammad Hussan	14301-4954159-4		100.17	GGCMS Banda Parachgan	AVP
34	Humaira Khan D/O Nawab Khan	14301-3068683-4		96.52	GGPS No.1 Muhammad Zai	AVP
35	Kaisoom Bibi D/O Iqbal Muhammad	14301-0532418-6		96.50	GGCMS Banda Parachgan	AVP
36	Basmina D/O Farash Khan	14301-5131962-8		94.86	GGPS No.1 Muhammad Zai	AVP
37	Mehwish Abdur Rehman D/O Abdur Rehman	14301-6311155-8		89.62 Adj UC	GGPS No.1 Muhammad Zai <i>part B</i>	AVP
38	Amina Naz D/O Badshah Gul	14301-8118276-2		74.94	GGPS No. 2 Muhammad Zai	AVP
39	Zarnaz D/O Zarmin Khan	4200-7423363-8	Nasrat Khel	144.27	GGPS Jabbi	AVP
40	Dilnaz D/O Zarmin Khan	4200-5548682-0		136.24	GGPS Jabbi	AVP
41	Haleema Ismat D/O Abdur Rashid	14301-0957988-4		111.6	GGPS No.1 Ambar Banda	AVP
42	Taiba Naz D/O Muhammad Moeen Ud din	14301-8605045-8		98.00	GGPS No.2 Ambar Banda	AVP
43	Kainat Ayaz D/O Muhammad Ayaz	14301-2102550-6	Shahpur	100.37	GGPS Aslam Abad	AVP
44	Gulnaz D/O Misree Khan	17201-1890955-0		93.98	GGPS Fateh Khan Khel	AVP
45	Dilshad D/O Muhammad Hanif	14301-7141996-4		93.58	GGPS Mir Bash Khel	AVP
46	Shabana Akhtar D/O Hameed ur Rehman	14301-4351473-6		84.57	GGPS Mir Bash Khel	AVP
47	Aisha Shabir D/O Shabir ur Rehman	14301-1823421-0		76.69	GGPS Lal Garhi	AVP
48	Saira Bano D/O Ghulam Muslim	14301-0491561-2	Sherkot	94.00	GGPS No.1 Chikar Kot Bala	AVP
49	Najma Bibi D/O Ahmad Hayat	14301-6976574-4	Togh Bala-I	121.70	GGPS No.1 Togh Bala (Part-A)	AVP
50	Warda Ghufraan D/O Ghufraan Gul	14301-8941870-0		100.30	GGPS No.1 Togh Payan	AVP
51	Miss Zeenat Yasmin D/O Wali Muhammad	38302-3089613-0	Urban-II	121.39	GGPS No.2 Sangher	AVP
52	Madiha Iram D/O Sultan Ahmad	14301-8866320-4		115.68	GGPS No.2 Garhi Risaldar	AVP
53	Miss Kinza Wafa D/O Gulzar Ahmad	14301-8403221-6		114.80	GGPS No.2 Sangher	AVP
54	Miss Sana Zaman D/O Zaman Khan	14301-0694520-8		108.57	GGPS No.1 Garhi Risaldar	AVP
55	Zahida Bibi D/O Khalid Zaman	14301-6214867-0	Urban-III	114.63	GGPS No.5 Jungle Khel	AVP
56	Mehnaz Bibi D/O Bahadur Shah	14301-1937232-6	Urban-IV	129.69	GGPS Malang abad	AVP
57	Maryam D/O Saadat Qayum	14301-2317241-4	Urban-VI	97.71	GGPS No.2 Baqizai	AVP
58	Sehrish Khan D/O Javed Khan	14301-4317816-0		95.00	GGPS Shaheeda Road	AVP
59	Miss Rubab Hassan D/O Ghulam Hassan	17301-9324313-8	Usterzai	127.38	GGPS Essa Khel Kachai	AVP
60	Miss Sanam Sakina D/O Abu Talib	14301-1986983-8		123.05	GGPS Hassan Khel Kachai	AVP
61	Zuhra Abdul Qayyum D/O Abdul Qayyum	14301-4206785-8	S.A. Alla Dad	128.62	GGPS Banda Zamir Gul	AVP
62	Sajda Zareef D/O Muhammad Zarif	34302-7438896-6		97.37	GGPS Dhok Islam Din	AVP
63	Salma Khaliq D/O Abdul Khaliq	WP244782017-Asma-Bibi-VS-Govt-KP-FC		94.39 Adj UC	GGPS Dhok Alif Gul	AVP

**ATTESTED**



S#	Name & Father Name	CNIC No	UC	Score	Name of School where posted	Remarks
64	Shazia D/O Khaista Badshah	14301-6039473-4	Z.S:Alla Dad	93.63	GGPS Darsha Khel	AVP
65	Tabassum D/O Hafiz ur Rehman	14301-6282105-6		93.25 Adj UC	GGPS Dhok Ibrahim	AVP
66	Naheeda Farid D/O Farid Gul	14301-7126508-8		85.45 Adj UC	GGPS Dhok Sparli Gul	AVP
67	Fehmida Jalil D/O Jalil Khan	14301-4266625-6		82.92 Adj UC	GGPS Dhok Islam Din	AVP
68	Jawaria Noshin D/O Rana Gul	42401-3376176-8		75.26	GGPS Shadipur	AVP
69	Nadia Mehmood D/O Sullan Mehmood	37104-1227126-6		70.89	GGPS Dhok Noor Afzal	AVP
70	Tabassum D/O Rauf Khan	14302-8341181-0		Lachi (Rural)	104.69	GGPS Terawal Banda (Lachi)
71	Apan Bibi D/O Gul Janan	14301-1901197-8	104.27		GGPS Chanda Fateh Khan (Lachi)	AVP
72	Razia Nasir Khan D/O Nasir Khan	35201-6855490-4	88.31		GGPS Ali Kach (Lachi)	AVP
73	Riffat Naz D/O Ashraf Zada	14302-9129088-4	86.72		GGPS, Wali (Lachi)	AVP
74	Iqbal Bano D/O Maqsood Khan	14302-0588465-3	76.47		GGPS, Ghurzandi, (Lachi)	AVP
75	Najma Bibi D/O Rashid Gul	14301-9105130-0	111.41		GGPS, Inzar Wala Banda (Lachi)	AVP
76	Chand Bibi D/O Syed Ghulam Hussain Shah	14301-3674994-4	Sudal		104.79	GGPS, Shewaki (Lachi)
77	Asma Bibi D/O Siddiq Ur Rehman	14301-1932883-8		109.15	GGPS, Hawasi Banda (Lachi)	AVP
78	Samina Naz D/O Siddiq Ur Rehman	14302-6342013-0		108.22	GGPS Chishana Ghunda (Lachi)	AVP
79	Shadaba Farid D/O Muhammad Farid	14301-4451648-8		105.54	GGPS, Kata Kani (Lachi)	AVP
80	Mussaral Shaheen D/O Faqir Shah	14301-5106434-6		106.57	GGPS, Grawan (Lachi)	AVP
81	Shazia Shamim D/O Amanullah Khan	14302-2933832-6		96.07	GGPS, Rukwan (Lachi)	AVP
82	Najma Shaheen D/O Umar Khan	14301-3736457-0		S/Dara (Rural-II)	92.73	GGPS, Zer Koi (Lachi)
83	Shahida Bibi D/O Ahmad Din	14301-0522280-8	92.17		GGPS, Janak (Lachi)	AVP
Minority Quota						
1	Sabita Laxmi D/O Urjan Das	14301-0743351-0	Urban-V	97.12	GGPS Aziz Abad, Ghurzai Payan	AVP
2	Nayyab D/O Nasir Masih	14301-0597767-0	Urban-I	90.00	GGPS NO.3 Muhammad Zai	AVP
3	Rachna Kanwal D/O Dhayan Chand	14301-9197129-8	Urban-I	76.91	GGPS No.2 Kharmatoo	AVP
Disabled Quota						
1	Ayesha Ashraf D/O Muhammad Ashraf	14301-6931070-8	Urban-V	113.24	GGPS, Wish Dhal Behzadi	AVP

### Terms & Conditions

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. They should not be handed over charge if She exceeds 35 years or below 18 years of age.
5. Appointment is subject to the condition that the certificate, documents, CNIC & Domicile must be verified from the concerned authorities by the DDO (concerned). If anyone found producing bogus/fake Certificate(s)/ Document(s) will be reported to the law enforcing agencies for further action.

WP2447-2017-Asma-Bibi-VS-Govt-KP-Full

**ATTESTED**

- 25
6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.
  7. Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that her/ their certificates / domicile /CNIC are verified.
  8. She/they should join her post within 15 days of the issuance of this notification. In case of failure to join her/their post within 15 days of the issuance of this notification, her/ their appointment will expire automatically and no subsequent appeal etc shall be entertained.
  9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
  10. Before handing over charge She / they will sign an agreement with the department, otherwise this order will not be valid.
  11. She/they will be governed by such rules and regulations as may be issued from time to time by the Govt.
  12. Her / their services shall be terminated at any time, in case her performance is found unsatisfactory during her / their contract period. In case of misconduct, she /they shall be preceded under the rules framed from time to time.
  13. Her / their appointment is made on School based, She/they will have to serve at the place of posting, and her / their service is not transferable to any other station.
  14. Before handing over charge once again her /their document may be checked if she / they has/have not the required qualifications she / they may not be handed over charge.
  15. If anyone candidate with fake document(s) / low score has been appointed erroneously, her / their appointment order would be withdrawn since the day of issuance in the best interest of the entitled/ right position holder candidate(s).

(Rizwana Liaqat )  
District Education Officer  
(Female) Kohat

Endst: No.2792-2886 / File PST Apptt: (2017)

Dated Kohat the 03/05/2017.

Copy forwarded for information and necessary action to the: -

1. District Controller of Accounts Kohat.
2. SDEO(F) Kohat & Lachi.
3. Official Concerned.
4. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
6. M/File

Attested

— Umar Hayat

Umar Hayat

District Education Officer  
(Female) Kohat

**ATTESTED**

مورخہ: ۰۵ مئی 2017


چارچ رپورٹ

فائل نمبر: ۰۵ Annex: D

1. بحال آرڈر نمبر (2017) Endst No 2792-2886/File PST April (2017) آمڈازڈ سرکٹ ایجوکیشن


آفیسر (زنٹانڈ) کولہاٹ۔

۲۔ مسماۃ میمنہ آسیا شانی کارڈ نمبر 4-7867878-14301 ساکن ملی ٹھک ہمراہ آرڈر نمبرہ بالا نے آج مورخہ ۰۵ مئی 2017 نے قبل از روپورٹ بوقت 0900 بجے سکول پہنچا اور نمونہ گرز پرائمری سکول سیاب کولہاٹ میں آکر اپنے عہدے PST کا چارج سنبھال لیا۔

  
 M. G. P. S. Sidi  
 Director  
 G. G. P. S. Sidi

دستخط چارج دہندہ  
 M. G. P. S. Sidi  
 Director  
 G. G. P. S. Sidi

مورخہ: ۰۵ مئی 2017

  
 Director  
 G. G. P. S. Sidi

دستخط چارج کر ہندہ  
 M. G. P. S. Sidi  
 Director  
 G. G. P. S. Sidi

ANNEX D

**ATTESTED**

27 ANNEX E

**BEFORE PESHAWAR HIGH COURT, PESHAWAR.**

WP No. 2447/2017



**Asma Bibi D/O Muhammad Afzal Khan**

R/O Mohallah New Abadi Union Council Billatang,  
Tehsil Tangi, District Kohat.

..... Petitioner

Versus

1. Govt. of K.P.K., through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
  2. Director Elementary & Secondary Education K.P.K., Directorate of Education of KPK, GT Road, Peshawar.
  3. District Education Officer (female) (Elementary & Secondary Education, District Kohat.
  4. Deputy District Officer (F) Primary (E & SE) Kohat.
  5. Regional Director NTS, Regional Office Rahatabad Colony, near Pakistan Forest Institute, Peshawar.
  6. Mamoona Asma D/O Mustafa Kamal, Primary School Teacher, GGPS, Siab, Billatang, Kohat.
  7. Mehwish Resham Gul D/O Resham Gul, Primary School Teacher, GGPS, Gandyali Payan, Billatang, Kohat.
  8. Javaria Noor D/O Inayat Ullah, Primary School Teacher, GGPS, Gandyali Payan, Billatang, Kohat.
- ..... Respondents

**WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN, 1973,**

**RESPECTFULLY SHEWETH:**

1. That the Petitioner is permanent residents of the Union Council Billatang Mohallah New Abadi, Tehsil & District Kohat.

**(Copy of Domicile attached as Annexure-A)**

**ATTESTED**

**ATTESTED**  
FILED TODAY  
Deputy Registrar  
06 JUN 2017

WP2447-2017-Asma-Bibi-VS-Govt-KP-Full

2. That the Petitioner is master degree holder and has done CT & PTC from the Allama Iqbal Open University Islamabad.

**(Copies are attached as Annexure- B & C)**

3. That the respondent No. 3 advertised some post of PSTs in a daily Newspaper in which all the terms and conditions were elaborately mentioned.

**(Copy of advertisement is attached as Annexure-D)**

4. That the Petitioner, being qualified for the post of Primary School Teacher (PST), applied for five schools according to the prescribed procedure. After going through the process and procedure (NTS), the merit list was drafted by Respondent No.5, in which the Petitioner was shown on merit according to the score for the Government Girls Primary Schools for selected schools except on GGPS Siab, of Union Council Billatang.

**(Merit lists are attached as Annexure-E & F)**

5. That the Petitioner time and again approached the respondents through written application but in vain and the Petitioner was orally informed that the merit list has been prepared under the undue and illegal pressure of the political authorities and Respondent No.3 as they wanted to adjust/appoint their own favorable persons instead of the Petitioner and other competent candidates.

6. That after the finalization of merit list the Respondent No.6, 7 & 8 were appointed, besides the facts that respondent No.7 is not the permanent resident of Union Council Billatang and according to rules and regulations / advertisement she is not entitled for appointment in petitioner union council. Secondly Respondent No.6 name is not figure in NTS result / merit list. Thirdly Respondent No.8 marks are less than petitioner. The petitioner filed departmental appeals before Respondent No.3 & 5 but of no avail and against the rules and their own advertisement final merit list has been prepared and the respondents No. 3 & 4 issued appointment orders respondents

**ATTESTED**

**FILED TODAY**

**ATTESTED**

WP2447-2017-Allama Iqbal Open University Islamabad

Deputy Registrar

**EXAMINER**  
Peshawar High Court

06 JUN 2017

No.6 to 8 smashing the legal and fundamental right of appointment of the petitioner for her personal benefit.

**(Impugned appointment order is attached as annexure-G)**

7. That, aggrieved by the actions/conducts of the respondents, and having no other adequate and efficacious remedy, the Petitioner do invoke the extra ordinary constitutional jurisdiction of this August Court, inter alia, on the following grounds:

**GROUNDS:**

- a) That action of respondents and the drafting the impugned merit lists by respondents No. 3 to 5 are based on mala fide, political pressure, and against the principle of Natural justice and the Fundamental Rights as enshrined in the Constitution of Pakistan, hence liable to be struck down.
- b) That the impugned actions taken by the respondents No. 3 to 5 are in utter disregard of the Constitution of Pakistan so as to defeat the cardinal Principle of equity. Hence, issuance of writ to undo the illegal, unconstitutional action and merit list as prayed for here and above.
- c) That the petitioner on better position on merit list and permanent resident of Union Council Billatang while the Respondent No.6 to 8 are missing all there qualification / qualities, hence, in this scenario the Petitioner is entitle to be appointed but the acts of the respondents, is violative of Article 4, 25 & 27 of the constitution as it, on its face, floatingly, smack of unsavory backdrop creating a jumping board for their blue eyed.
- d) That the Petitioner, being a deserving candidate, was not considered till date besides on the top of the merit lists and intentionally ignored, which act of the Respondents is illegal, void-ab-initio, without jurisdiction, in excess of

FILED TODAY

WP2447-2017 Asma Bibi VS Govt-KP-Full

06 JUN 2017

ATTESTED  
EXAMINER  
Peshawar High Court

06 JUN 2017

FILED TODAY  
Deputy Registrar

EXAMINER  
Peshawar High Court  
ATTESTED




Advocate

- 1. Constitution of Islamic Republic of Pakistan, 1973.
- 2. Any other law books as per needs

List of Books

Advocate



Certificate  
Certified that no Writ Petition has earlier been filed by the PETITIONERS on the above subject before this Honourable Court.

Peshawar

Advocate High Court,

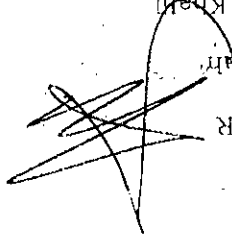
Bilal Khan Khan

&

Asif Ali Shah

Through

PETITIONER



IT IS, FURTHER, PRAYED THAT THE APPOINTMENT  
ORDER OF RESPONDENTS NO. 6 TO 8 MAY KINDLY BE  
SUSPENDED TILL THE FINAL DISPOSAL OF THIS WRIT  
PETITION.

Interim Relief:

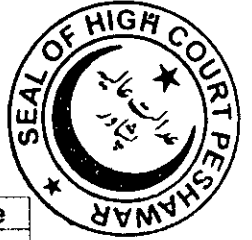
IT IS, THEREFORE, PRAYED THAT IN VIEW OF THE  
ABOVE SUBMISSIONS THE INSTANT WRIT PETITION  
MAY GRACIOUSLY BE ACCEPTED AND THE  
PETITIONER MAY KINDLY BE APPOINTED ACCORDING  
TO THE MERIT LIST.

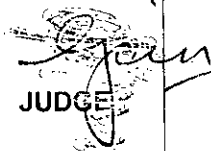

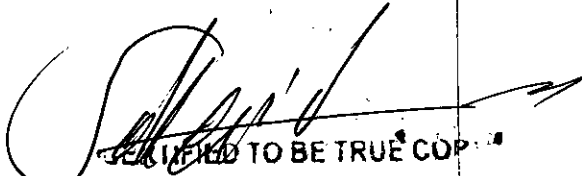
- 1) That the Petitioners reserves rights to advance other points at the time of hearing this petition.
- 2) That such practice of the respondents will encourage the political authorities to get involved themselves into the appointment/posting and transfer matters of the civil servants in future, which has been very strictly prohibited by the apex courts including the Supreme Court of Pakistan.
- 3) That the Petitioner has been discriminated without any just and reasonable cause and thereby offending the fundamental rights of the Petitioners as provided by the constitution of 1973.
- 4) That the Petitioners reserves rights to advance other points at the time of hearing this petition.

Amended 300

**PESHAWAR HIGH COURT, PESHAWAR.**

**FORM 'A'**  
**FORM OF ORDER SHEET**



Date of order.	Order or other proceedings with the order of the Judge
24.02.2021	<p><b><u>W.P.No.2447-P of 2017.</u></b></p> <p><b>Present:</b> Nemo for the petitioner.</p> <p>Mr. Muhammad Riaz, AAG for the Provincial Government.</p> <p>Mr. Zia-ur-Rehman, advocate for the respondent No.6.</p> <p>-----</p> <p><b><u>LAL JAN KHATTAK, J.-</u></b> Despite date by court, neither the petitioner nor her counsel is in attendance.</p> <p>Dismissed in default.</p> <p style="text-align: right;">   <b>JUDGE</b> </p> <p style="text-align: right;">   <b>JUDGE</b> </p> <p style="text-align: right; font-size: 2em;">  </p> <p style="text-align: right;"> <b>EXAMINER</b>  Peshawar High Court, Peshawar  Authorized Under Article 87 of  the Constitution of Pakistan 1973  <b>04 MAR 2021</b> </p>

No. 22486

Date of Presentation of Application. 3/3/2021

No of Pages 69

Copying fee 24/-

Total 24/-

Date of Preparation of Copy 4/3/2021

Date of Delivery of Copy 4/3/2021

Received By [Signature]



Amex G

مختصر جناب انجمن ترقی تعلیمات اسلامیہ (Pay release)

درخواست برائے (Pay release)

جناب عالمی

مورد نامہ گزارش ہے کہ سائنسدان کی تنخواہ جو کہ 2018/11/11

سے بند کی گئی ہے۔ جو کہ اب تک بند ہے۔ میں ایک ریگولر ڈیپارٹمنٹ ہوں۔ کنونشن

میں (NATS) سے (Appoint) ہوئی تھی۔ میں پہلے ہی تنخواہیں لے چکی ہوں

میں بھی بغیر کسی وجہ کے میری تنخواہیں بند کر دی گئی تھی۔ جو کہ بعد میں تقرر

تین ماہ بعد کھول دی گئی تھی۔ اور اب بغیر کسی وجہ کے پھر بند کر دی گئی ہیں

جو اب جناب کا کام لینا تھا۔ کمیشن اور باجی کورٹ میں ایک پٹریٹ

(Pending) ہے۔ جب اس کا فیصلہ ہوگا تو تب آپ کی تنخواہ کھول دی جائے گی۔

جبکہ عدالت مختصر کی جناب سے میری تنخواہ بند کرنے کی بابت کوئی آرڈر

جاری نہیں کیا گیا تھا۔ میں روزانہ ریگولر سکول جا کر اپنے فرائض سر انجام

دے رہی ہوں۔ لہذا اب جناب سے گزارش ہے کہ میری تنخواہ کھولی جا کر میری

داد رسی کی جاوے۔

عین نواری میں ہوگی۔ 16/12/2020

العازمہ: مہونہ أسماء بی بی (سربراہ)

یہ منسل نمبر: 06870599

14301-7867818-4

شہناز میاں وارث مختصر

ATTESTED

ANNEA H 34

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) KOHAT

No 211

Dated 10/2/2021

To

The District Education Officer,  
(Female) Kohat.

Subject: APPLICATION FOR PAY RELEASE

Memo,

Enclosed please find herewith an original application in respect of Mst. Maimoona Asma D/O Mustafa Kamal PST GGPS Siab requesting for release of her pay w.e.f 10/2018. Her pay release order withdrawal due to non verification of academic / professional documents, till further order vide your good office Endst No. 13307-8/F.21/Vol:1 dated: 03-10-2018. The Advocate General Peshawar High Court also verbally directed to release her pay till the decision of High Court. As per statement of PSHT of said school that she is performing her duty regularly.

NO 1385  
of 13/2/21

Submitted for further order please.

Returned with the remarks that  
Please process the case as per law/  
policy and send detail report  
fulfilling all the costal  
formalities at your end, pls.

Sub: DIV. EDU. OFFICER  
(FEMALE) KOHAT

10/02

209

No ——— dated ——— 2021.  
Resubmitted, with the request that - the case  
is purely pertain to your office as disciplinary  
proceeding was initiated by your office but not yet  
reach to logical conclusion, Pay has also been  
stopped vide order referred above. Please guide the  
office what to do next, now.

Attested  
*[Signature]*

S.D. (OFF)  
Kohat

PAYROLL FORM SYSTEM  
ADJUSTMENT FORM  
SINGLE EMPLOYEE ENTRY

OFFICE OF THE SUB DIVISION EDUCATION OFFICER (FEMALE) KOHAT  
FOR THE MONTH OF 08/2018

DDO CODE (New Centre)  
K T - 6 0 9 0

Description

P.Code: 80107149

380  
618

EMPLOYEE NUMBER	EMPLOYEE NAME	GENERAL DATE CHANGE		Change in payments/deductions			STOP SALARY	EFFECTIVE DATE	REMARKS
		Info Type	Field ID	New Contents	Wage Type	Amount			
0987059	Memoona Asma, PST								She obey the order now her pay for the month of 5-7/2018, is release by the under signed. Pay release order attached
	GCPS Dh. Slah								
	BPS-12			Adj: Pay	S801	42840			
				Adj: HRA	S002	3918	(+)		
				Adj: Med: Allow	S012	4500	(+)		
				Adj: Convy Allow	S011	3568	(+)		
	DEDUCTIONS for 05-07/2018								
6075	GPF: 2220*3= 4410			Adj: Ar-2013	S309	1050	(+)		
6001	IME: 600*02= 1800			Adj: Ar-2015	S364	678	(+)		
6060	EEF: 125*03= 375			Adj: Ar-2016	S075	3582	(+)	Arrear 01-05-2018 TO 31-07-2018 (3 Months)	
2617	REASDC: 1052*03= 3156			Adj: Ar-2017	S990	4281	(+)		
						4281	(+)		
						3704	(+)		
						65136	(+)		

Entered / Verified By

Audit/Checked by

DDO SDEO (F)

Kohat

**ATTESTED**

PAYROLL FOR SYSTEM  
ADMINISTRATIVE FORM  
SINGLE EMPLOYEE ENTRY

OFFICE OF THE SUB DIVISION EDUCATION OFFICER (FEMALE) KOHAT  
FOR THE MONTH OF 08/2018

DDO CODE K T . G O 9 0  
(Check Correct)

Description

P.Code: 80107149  
*Shahid*

380  
218

FORM: PAY10  
Date: \_\_\_\_\_  
Page No: \_\_\_\_\_

EMPLOYEE NUMBER	EMPLOYEE NAME	GENERAL DATE CHANGE		Change in payments/deductions			EFFECTIVE DATE	REMARKS
		Field ID	New Contents	Wage Type	Amount	STOP SALARY		
		Info Typ			Rupees	Adj		
00870599	Necanora Asma, PST			078		Pay Active	01/08/2018	She obey the order now her pay for the month of 5-7/2018, is release by the under signed Pay release order attached.
	GGPS Da, Slab							
	BPS-12		Adj: Pay	5001	4240			
			Adj: HRA	5002	3918	(*)		
			Adj: Med: Allow	5012	4500	(*)		
			Adj: Convy Allow	5011	8368	(*)		
6075	GPF: 2220*3= 4410		Adj: Ar-2013	5309	1050	(+)		
6001	EPF: 600*03= 1800		Adj: Ar-2013	5564	678	(+)	01-05-2018 TO 31-07-2018	
6060	EEF: 125*03= 375		Adj: Ar-2016	5075	3582	(+)	(3 Months)	
2617	RB&DC: 1052*03= 3150		Adj: Ar-2017	5090	4284	(+)		
			Adj: Ar-2018		4284	(+)		
					13704	(+)		
					65136	(+)		

DDO *Shahid*  
SDEO (F1)  
P. Koha:

Audit Checked by *Shahid* 9/8. *Shahid*

Entered / Verified By

**ATTESTED**

**POWER OF ATTORNEY**

In the Court of

*Wahab Rabeem Khan Service Tribunal Peshawar*  
*Memona Asma*

} For  
} Plaintiff  
} Appellant  
} Petitioner  
} Complainant

**VERSUS**

*Govt of KPK and others.*

} Defendant  
} Respondent  
} Accused  
}

Appeal/Revision/Suit/Application/Petition/Case No. \_\_\_\_\_ of \_\_\_\_\_  
Fixed for \_\_\_\_\_

I/W, the undersigned, do hereby nominate and appoint

**ZARAJ ANWAR & IMRAN KHAN ADVOCATES**, my true and lawful attorney, for me in my same and on my behalf to appear at *Peshawar* to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

**AND** to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

**AND** I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

**PROVIDED** always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

**IN WITNESS** whereof I/we have hereto signed at \_\_\_\_\_  
the \_\_\_\_\_ day to \_\_\_\_\_ the year \_\_\_\_\_

Executant/Executants \_\_\_\_\_

Accepted subject to the terms regarding fee \_\_\_\_\_

*Imran Khan*  
**IMRAN KHAN**  
Advocate High Court.  
Mob: 0345-9090648

*Zaraj Anwar*  
**ZARAJ ANWAR**  
Advocate High Courts

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT  
FR-3, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt.  
Mobile-0331-9399185  
BC-10-9851  
CNIC: 17301-1610454-5

**"B"**

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

No.

*Recd*

Appeal No. 4816 of 2021  
Memoonah Asma Appellant/Petitioner

— through Secy ERSE Pesh. *Versus* Respondent

Respondent No. ....

Notice to: —

Distt: Education officer (Female) Kohat.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa 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 appellent/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.....9<sup>th</sup>

Day of.....July.....2021

(for reply)

[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.

**"B"**

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

No.

Appeal No. 4816 of 20 21

Memoona Asma Appellant/Petitioner

Versus

Through Secy EESE Pesh. Respondent

Respondent No. 4

Notice to:

Distt - Accounts officer, Kohat.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa 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 10/8/2021 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.

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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 9th

Day of July 21

(for reply)

M. J. J.  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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. SB

No.

Appeal No..... 4/816 ..... of 2021.

..... Memoona Asma ..... Appellant/Petitioner

Versus

Govt. of KPK Through Secy E&S Pesh. Respondent

Respondent No..... 2 .....

Notice to:

Director Elementary & Secondary Education  
KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa 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..... 10/8/2021 ..... 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.

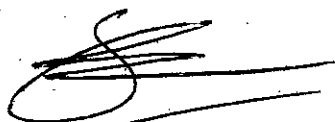
Copy of appeal is attached. Copy of appeal has already been sent to you vide this


office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 9<sup>th</sup> .....

Day of..... July ..... 20 21.

(for Reply)

  
30/7/2021

  
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. SB

No.

Appeal No. 4816 of 2011

Memona Asma Appellant/Petitioner

Versus

Govt. of KPK Through Secy. EBSE Pesh. Respondent

Respondent No. 1

Notice to: Govt. of KPK Through Secretary Elementary & Secondary Education Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa 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 10/8/2011 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 via this office~~ Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 9th .....

Day of July 2011

(for Reply)

*[Handwritten signature]*  
03/08

*[Handwritten 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.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.**

Service Appeal No. 4816/2021

Mst. Memoona Asma, PST, GGPS, Saib District Kohat.

*.....Appellant*

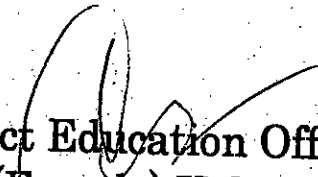
**VERSUS**

Secretary (E&SC) Department, Khyber Pakhtunkhwa  
and Others.

*.....Appellant*

**INDEX**

S#	Description of Documents	Annexure	Pages
1.	Joint Para Wise Comments	-	1-3
2.	Affidavit	-	4
3.	Copy of Detail Marks Certificate of M.Sc	"A"	5
4.	Notification	"B"	6-8
5.	Copy of Charge Sheet, Statement of allegations, Show Cause Notice and Letter of Personal Hearing / Inquiry Report / Speaking Order.	"C"	9-17

  
District Education Officer  
(Female) Kohat

①

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

Service Appeal No: 4816/2021

**Mst: Memoona Asma PSTGGPS Siab District Kohat.....Appellant.**

**VERSUS**

**Secretary (E&SE) Department, Khyber Pakhtunkhwa & others...Respondents**

**JOINT PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No:1-3.**

Respectfully Sheweth:-

The Respondents No.1-3 submit as under:-

**Preliminary Objections.**

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 8 That the instant Service Appeal is not maintainable in its present form.
- 9 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.

11 That the Appellant is not competent to file the instant appeal against the Respondents.

ON FACTS.

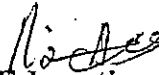
- 1 That Para-1, needs no comments being pertains to the service record of the appellant.
- 2 That Para-2 concern to the extended that proper advertisement duly published in daily newspaper, seeking application from suitable candidates the appellant also applied for PST post and sneaked her way to get appointment via fraudulent back ground by tempering date of declaration of result in M.SC Pak study degree , the appellant conceals material facts before the authority as well as the Honorable Tribunal.(Copy of order is attached annexed as annexure A).
- 3 That Para-3 is correct that the appointment were made but initially the appellant was in probation period subject to the verification of the testimonials which were duly verified and the academic records were found in different. (Copy of record is annexed as annexure B).
- 4 Para No.4 is based on presumption and assumption, the appellant tender illegal testimonials which were under processes for verification and after result of verification, proper departmental enquiry were conducted by serving the charge sheet & Show Cause Notice which was duly served to the appellant and the appellant deliberately not submitted reply in due course of time, the appellant was ask for to appear personally before authority for personal hearing but she failed, resultantly, the services of appellant were removed (Copy of record is annexed as annexure C).
- 5 That Para-5 pertain to record.
- 6 That Para-6 has no concern with respondent department, the pay of appellant was stopped due to her own conduct.
- 7 That Para-7 has no concern hence no comments.
- 8 That Para-8 is concern the appellant filed appeal for release of pay before appellate authority which is irrelevant forum, having no locus standi to the appellant, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia:-

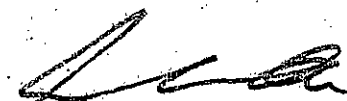
ON GROUNDS.


- A Incorrect & not admitted. The appellant has been treated in strictly in accordance with rules & regulations.


- B Incorrect & not admitted. The appellant has been served Charge Sheet, Show Cause Notice, after fulfilling the legal formalities, resultantly she was remove from service copy already attached.
- C Incorrect & not admitted. The ground is incorrect already discuss hence need no comments.
- 10 Incorrect & not admitted. Already explained in leading para of facts.
- D Incorrect & not admitted. Already explained in leading para of facts.
- E Incorrect & not admitted. The appellant violate the rules & mar the right of next meritorious candidate by tempering date of declaration of result of MSc Pak study Degree.
- F Incorrect & not admitted. All the received salary were be recovered with the approval of the competent authority on the basis of gross misconduct of the appellant.
- G Incorrect & not admitted. Already explained in leading para of facts.
- H Incorrect & not admitted. Already explained in leading para of facts.
- I Incorrect & not admitted. Already explained in leading para of facts.
- J Incorrect & not admitted. This has no concern with Respondent Department.
- K Legal. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

  
 District Education Officer  
 (Female) Kohat.  
 (Respondent No: 3)  
 District Education officer  
 (Female) Kohat

  
 District Accounts Officer  
 Kohat  
 (Respondent No: 4)  
 District Accounts Officer  
 Kohat

  
 DIRECTOR  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondent No: 2)  
 Director  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa Peshawar

  
 SECRETARY  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondent No: 1)  
 SECRETARY  
 Elementary and Secondary Education  
 Govt. of Khyber Pakhtunkhwa

4

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No: 4816/2021

**Mst: Memoona Asma PSTGGPS Siab District Kohat.....Appellant.**

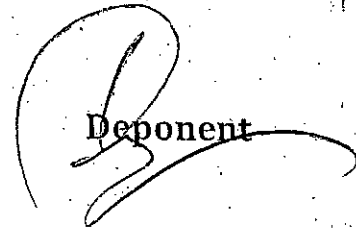
**VERSUS**

**Secretary (E&SE) Department, Khyber Pakhtunkhwa & others...Respondents.**

**AFFIDAVIT**

I, **Ghulam Qadir Supdt BPS-17 District Education Officer  
(Female) Kohat**, do hereby solemnly affirm & declare on oath that the contents of the instant parwise Comments are true & correct to the best of my knowledge & belief.

**Deponent**



6

NO 10

(40)

**ALLAMA IQBAL OPEN UNIVERSITY**

Department of Examinations  
(Verification Certificate Section)

\*\*\*

No.F.1-22-2018-Supdt-Veri-Cert/

Dated: - 16<sup>th</sup> August, 2018

Sub Divisional Education Officer,  
(Female), Kohat

Subject: - Re-verification/Authentication of Provisional Result Card

Dear Student,

In continuation of this office letter No.F.1-5/Veri/136217 dated 23<sup>rd</sup> May, 2018 on the subject cited above.

I am directed to inform, that some ambiguity in the already verified certificate in favor of Ms. Miamoona Asma, Registration No. 06NKT0126, under reference has been pointed out after issuance of verified copy of PRC No. 62655 of Master of Science (Pakistan Studies) program.

You are requested to provide original PRC through Courier Services/By hand enabling this office to proceed further. If require documents does not receive to this office, the already verified PRC will not be considered.

0/6

(Superintendent Verification)



6 7

**Postage Prepaid**  
No postage required to be affixed



Regd Letter No 821

Verification Section  
Sub Post Office  
Allama Iqbal Open Unive

By Post Credit  
Facility by Rawalpindi G.P.O.  
24 MAY 2018  
Express Post (Registered) (NPO)  
Care of Post Office

If Undelivered please return to:  
Incharge Certificate Section Block No. 3,  
Allama Iqbal Open University,  
Sector, H-8, Islamabad.  
Post Code: 44000



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD



19055

Roll No.

EA586178

Registration No.

06NKT0126

MAIMOONA ASMA

Final Semester

SPR-2016

Name MUSTAFA KADAL

ABDUL WAHAB HAD WARE SERVICE MANID BILLI  
TANG



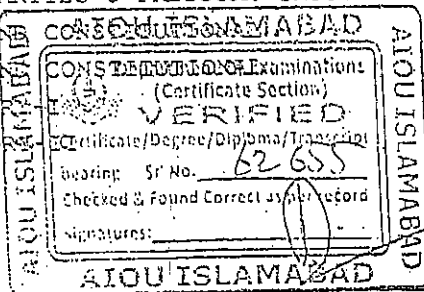
KORAT

KORAT

Successfully completed MASTER OF SCIENCE  
(PAKISTAN STUDIES)

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT-14	4655	GENESIS OF PAKISTAN MOVEMENT	100	66
AUT-14	4655	GEOGRAPHY OF PAKISTAN-I	100	69
AUT-14	4656	GEOGRAPHY OF PAKISTAN-II	100	56
AUT-14	4657	PAKISTANI LANGUAGES & LITERATURE-I	100	61
AUT-14	4658	PAKISTANI LANGUAGES & LITERATURE-II	100	56
SPR-15	4659	IDEOLOGICAL FOUNDATIONS OF PAKISTAN	100	55
SPR-15	4659	ECONOMIC DEVELOPMENT IN PAKISTAN-I	100	66
SPR-15	4660	ECONOMIC DEVELOPMENT IN PAKISTAN-II	100	64
SPR-15	4661	FOREIGN POLICY OF PAKISTAN-I	100	71
SPR-15	4662	FOREIGN POLICY OF PAKISTAN-II	100	70
AUT-15	4641	SOCIAL CHANGE	100	61
AUT-15	4663	PAKISTANI SOCIETY & CULTURE-I	100	59
AUT-15	4664	PAKISTANI SOCIETY & CULTURE-II	100	66
AUT-15	4665	RESEARCH METHODS-I	100	56
AUT-15	4665	RESEARCH METHODS-II	100	60
SPR-16	4645	POLITICAL PARTIES & PRESSURE GROUPS IN	100	69
SPR-16	4667	POLITICAL AND CONSTITUTIONAL	100	62
SPR-16	4668	POLITICAL AND CONSTITUTIONAL	100	63
SPR-16	4669	SOCIAL THEORY	100	65
SPR-16	4670	SOCIAL THEORY	100	65



Credit Hours 60  
Result Declared on MARCH 17, 2017  
Date of Issue APRIL 17, 2017

Total Marks/Obtained 2000 / 1250  
Percentage/Grade 63 B

Controller of Examinations

Declaration: This result is provisional and subject to verification. Any entry appearing in this card does not itself confer a degree or diploma. The final certificate or diploma will be issued under the rules/regulations on the basis of the final result.

(X) (9) (71) (36)  
NO 13

OFFICE OF THE DISTRICT EDUCATION  
OFFICER (FEMALE) KOHAT  
No. 11583 / Appu file PST  
Dated Kohat the 11-08-2018

To

Miss Mamoona Asma  
PST GGPS Siab Tehsil & District Kohat

Subject CHARGE SHEET/ STATEMENT OF ALLEGATION

Memo:-

I am to refer to the subject noted above and to ask you that the following allegations have been charged against you

- a) Misconduct: - That you have been found guilty to attempt criminal assault by providing/ presenting fake DMC of MSc Pak Study obtained from AIOU Islamabad, recorded thereon date of declaration of result as 06.09.2016, before Scrutiny committee during meeting held in order to check and scrutinized the documents, resultantly your merit position raised from 85.51 score to 94.94 consequently appointed as PST at GGPS Siab Kohat, in pursuance of complaint lodged by Asma D/O Muhammad Afzal R/O Village Billitang Tehsil & District Kohat you are asked for vide this office letter No: 4139 dated 20.06.2018 to come up with original documents. The MSc PS DMC shown by you which depicts that original date of declaration of result is 17.03.2017 the score of which is not valid to be included in merit list after due date i.e. last date of submission of application, owing to your fraud/ cheating thus committed you are not deserve/ eligible to be appointed as PST

- b) Cheating

In the wake of above you are directed to explain your position and submit written reply in your defence, if any, within 07 days of the receipt of this notice or within 15 days of issuance of this letter. In case you failed to submit reply of this notice, it will be presumed that you have no defence and in that case an ex-parte action will be taken against you under E&D rules 2011.

It may also be intimated whether you desire to be heard in person or not.

*sd*  
DISTRICT EDUCATION OFFICER  
(FEMALE) KOHAT

Encls As Above

Endst No \_\_\_\_\_

Copy of the above is forwarded to:-

- 1-4 Inquiry committee concerned
5. Sub Divisional Education Officer (Female) Kohat
6. Master file.

*sd*  
DISTRICT EDUCATION OFFICER  
(FEMALE) KOHAT

*Www*

(24) (10) (22) (35)

CHARGE SHEET

I, Mrs. Bibi Rizwana District Education Officer (Female) Kohat, as a competent authority, hereby charge you, Miss Mamoon Asma PST GGPS Siab (Kohat) as follow:-

That you, while posted as PST at GGPS Siab Kohat committed the following irregularities:-

- a) Misconduct: - That you have been found guilty to attempt criminal assault by providing/ presenting fake DMC of MSc Pak Study obtained from AIOU Islamabad, recorded thereon date of declaration of result as 06.09.2016, before Scrutiny committee during meeting held in order to check and scrutinized the documents, resultantly your merit position raised from 85.51 score to 94.94 consequently appointed as PST at GGPS Siab Kohat, in pursuance of complaint lodged by Asma D/O Muhammad Afzal R/O Village Billitang Tehsil & District Kohat you are asked for vide this office letter No: 4139 dated 20.06.2018 to come up with original documents. The MSc PS DMC shown by you which depicts that original date of declaration of result is 17.03.2017 the score of which is not valid to be included in merit list after due date i.e. last date of submission of application, owing to your fraud/ cheating thus committed you are not deserve/ eligible to be appointed as PST.
  - b) Cheating
2. By the reasons of the above, you appear to be guilty of misconduct, cheating/fraud /violation of rules under rules-3 of the Khyber Pakhtunkhwa Government Servant (Efficiency & Disciplinary) Rules 2011 and you have rendered yourself liable to all or any of the penalties Specific in Rules 4 of the rules ibid.
  3. You are, therefore required to submit your written defence within Seven Days of the receipt of this charge Sheet to the enquiry officer.
  4. Your written defence, if any, should reach the enquiry Officer within the Specified period, failing which it shall be presumed that you have no defence to put in and in the case ex-parte action shall be taken against you.
  5. Intimate whether you desired to be heard in person.
  6. Statement of allegation is enclosed.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) KOHAT

(11) NO 18 (77)



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHAT

Miss Mamoon Asma  
PST GGPS Siab Tehsil & District Kohat

Subject: SHOW CAUSE NOTICE

I, Rizwana Liaqat, as competent authority, under the Khyber Pakhtunkhwa Government Servants Efficiency and Discipline Rules, 2011, do hereby serve you Show cause Notice, Miss Mamoon Asma PST GGPS Siab District Kohat.

(i) That consequent upon the completion of enquiry conducted against you by The enquiry committee consisting of the following officers :-

- (a) Mrs. Musara Fida Principa: GGHS Babri Banda Kohat.....(Chairman)
  - (b) Mrs. Najma Sahar Headmistress GGHS Kharmatoo Kohat.....(Member)
  - (c) Mrs. Shabana Inam SS GGHS Jungie Khel Kohat.....(Member)
  - (d) Mr. Muhammad Rashid Asstt Programmer DEO(F) Kohat.....(Member)
  - (e) Mr. Musharaf Khan S/Clerk DEO(F) Kohat.....(Member)
- the enquiry Committee for which you were given opportunity of personal hearing.

(ii) On going through the findings and recommendations of the enquiry report, the material on record and other connected papers including your defence before the enquiry Committee.

I am satisfied that you have committed the following acts/omissions specified in rules 3 of the ibid rules:

- (a) Guilty of Misconduct
- (b) Cheating

2. As a result therefore, I as competent authority, have tentatively decided to impose upon you the penalty of REMOVAL FROM SERVICE as specified under rule 4 (b) (iii) of the said rules.
3. You are, therefore required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
4. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in, and in that case an ex-parte action shall be taken against you.
5. A copy of the findings of the enquiry officer committee is enclosed.

DISTRICT EDUCATION OFFICER  
(FEMALE) KOHAT

No. 3392-93 /PF Mamoon Asma Dated Kohat the 04/3/2019

Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Sub: Divisional Education Officer (Female) Kohat
3. Personal File

*N. Liaqat*  
DISTRICT EDUCATION OFFICER  
(FEMALE) KOHAT

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NO 13

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Musarrat Fida  
Incharge Principal GGHSS Babri Banda Kohat  
Chairman Enquiry Committee

To:

Mst. Maimoona Asma-D/o Mustafa Kamal  
Mohallah Dhakki Billitang Kohat/ PST GGPS Saib Billitang  
Kohat

Subject:

ATTENDANCE /FACE THE ENQUIRY

Memo:

It is inform you that the enquiry committee is going to enquire the allegation leveled by the DEO (F) Kohat for which charge sheet already communicated to you vide DEO (F) No. 11583 dated 04-08-2018, reply of which was supposed to be furnished before enquiry committee within stipulated time but failed to do so.

You are directed to appear before enquiry committee on 13-09-2018 in the office of DEO (F) Kohat at 10am. It is mandatory to ensure your attendance otherwise impartial enquiry will be carried out from available record.

sd

Musarrat Fida  
Incharge Principal GGHSS Babri Banda Kohat  
Chairman Enquiry Committee

Copy to the:

1. DEO (F) Kohat with reference to her No. 11578-82 dated 04-08-2018 for information please
2. SDEO (F) Kohat and Dealing assistant with the remarks ensure your attendance on the date fixed
3. Mst. Asma Afzal D/o Muhammad Afzal Khan resident of Billitang Kohat with the request to come up at the venue and date fixed in order to observe transparency and impartial ongoing departmental proceedings/ enquiry. Please ensure your attendance.

Musarrat Fida  
Incharge Principal GGHSS Babri Banda Kohat  
Chairman Enquiry Committee

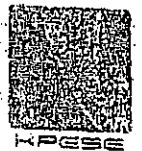
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MO = 152 B

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OFFICE OF THE  
DISTRICT EDUCATION OFFICER



demisfemalekohat@gmail.com (FEMALE) KOHAT 0922-9260290

No. \_\_\_\_\_ / F.No.1/Vol-1/Appointment /Estab:Primary /DEO (F) Kohat . Date \_\_\_\_ / \_\_\_\_ /2018  
\*\*\*\*\*

To,  
Mst; Musarrat Fida (SS),  
GGHSS Babri Banda, Kohat.

Subject: PERSONAL HEARING ON REQUEST OF MST; MAIMOONA ASMA  
PST GGPS SIAB

Memo:  
Reference application dated 02/10/2018 received from Maimoona Asma PST GGPS Siab (photocopy attached), you are directed to call the teacher concerned for personal hearing as she could not present on 06/09/2018 before the inquiry committee due to her illness. You are further directed to submit your finding within 3 days positively, as you are already nominated as inquiry officer in the instant case.

*gdl*  
DISTRICT EDUCATION OFFICER  
(FEMALE), KOHAT

Date: 08 / 11 /2018

No. 167cc-03 / F.No.1/Vol-1/Appointment/  
Estb: Pry/DEO (F) Kohat

- Copy to the:
1. Director E& SE KPK, Peshawar.
  2. Deputy Commissioner Kohat.
  3. SDEO Concerned.
  4. PA to DEO (F) Kohat
  5. Master File

*h. a. s.*  
DISTRICT EDUCATION OFFICER  
(FEMALE), KOHAT

(15)

(17)

ENQUIRY REPORT IN RESPECT OF MAIMOONA ASMA PST GGPS SLAB

Authority:

DEO (F) Kohat through Notification issued Vide Endst No. 11578-82/F.No.39/Vol-I/ADEO (Estab) Primary/DEO (F) Kohat dated 04.08.2018.

Preamble:

To probe into the matter as complaint filed by Asma Afzal D/O Muhammad Afzal alleged therein that Mst: Maimoona Asma PST GGPS Slab with the collaboration of office hand including MSC Pak Study Score in merit list on eve of appointment process by tempering/altering date of declaration of result which was not included in NTS displayed merit list, as the result of said degree was declared on 17.03.2017, after cut off date i.e last date of submission of application which should not be incorporated as per rules.

VENUE: DISTRICT EDUCATION OFFICE (FEMALE) KOHAT

DATE OF ENQUIRY: 13-09-2018

PROCEDURE:

We, the enquiry committee, thus constituted by DEO (F) Kohat, with a view to make surveillance study of the complaint against the above named accused teacher, adapted the following procedure to bring the fact on surface.

1. The accused Mst: Maimoona Asma PST GGPS Slab has been sent a letter through mail to appear personally before enquiry committee on 13.09.2018 in the office of DEO (F) Kohat and submit reply of charge sheet issued by DEO (F) Kohat Vide No. 11583 dated 04.08.2018, on the day of enquiry, being a chairperson of enquiry committee, telephonically contact the accused to present before enquiry committee and waited till the close of office hour, but she failed to appear rather deliberately turned deaf ear to enquiry proceeding; instead her father come up before enquiry committee in front of DEO (F) Kohat sitting in chair, threaten the enquiry committee for dire consequences and sued in court of law the whole enquiry committee as well as officers/officials of entire office, if disciplinary proceedings initiated against her daughter (Mst: Maimoona Asma PST) may not stop forthwith. In other words, neither the accused teacher appear before enquiry committee nor submit reply of charge sheet and statement of allegations which hints rampant attitude towards official responsibility and does not consider herself abide by rules/regulations and going on her own whim like and dislike.
2. The complainant Mst: Asma Afzal D/O Muhammad Afzal has been asked for to appeared before enquiry committee, she appeared and submit her statement, the pleading/stance of her complaint is convincing one. (Copy attached as Annexure A).
3. A questionnaire has been served upon the Rozina Begum Principal BPS-19 Chairperson scrutiny committee, she crystal clear refute to enter MA Pak Study score in merit list provided /displayed by NTS, neither the said degree was provided by accused during scrutiny meeting nor the MSc degree score was entered in NTS merit list. (Copy attached as Annexure B).
4. A questionnaire has been served upon Mr. Muhammad Yaqoob SC office of the SDEO (F) Kohat the dealing Assistant for PST appointment process, member of scrutiny committee and custodian of PST appointment relating record, he pleaded that during the course of scrutiny meeting the accused Mst: Maimona Asma PST herself present all testimonials duly attested by one bank officer including the MSc Pak Study score which was not entered/ included by NTS. He was supposed to enter the score with the approval of competent authority or with consent of chairperson of scrutiny committee and should remain within the dimension of prescribed limit. (Reply of questionnaire is attached as Annexure C).

Ryhad

AD

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(14) (15) (16)

BACKGROUND:

An essence of the instant case is that accused Mst: Maimoona Asma PST GGP's Siab at the time of submission of application to NTS, applied for PST post and entered on NTS web site her qualification as BA/PTC; after conducting test, the NTS displayed tentative merit list and directed all the candidates to make queries if there found some errors, the accused does not bother to communicate MSc degree score within a stipulated period of query. Finally, the NTS displayed final merit list in which the accused obtained 85.50 aggregate score. After downloading the compiling the UC wise merit list the DEO (F) displayed the said merit list and given vast publicity through print media and social media, there after framed scrutiny committee in order to scrutinize the documents of candidates. On occasion of scrutiny or after scrutiny, what so ever the circumstances, her MSc Pak study score included in merit list due to which her aggregate score has been enhanced from 85.50 to 94.94. It is also astonishing to observe that the DSC also unintentionally or over sightedly consider the amended score without knowing why and how the MSc Pak Study score of accused has been included without the approval of competent authority. To grab any officer/officials in the instant controversy for deliberate commission wrong, no substantive evidence was collected against anyone but next meritorious candidate push to brink of ledge, from light onto darkness, deprived her (the complainant Mst: Asma Afzal) from due deserving right, who would be appointed as PST securing 90.10 total marks and stood at S. No.12 of the UC Billitang merit list and 12 posts of PST were required to be filled up in specific UC.


FINDINGS:

Bare perusal of record and circumstantial documentary evidence revealed that:

1. Mst: Maimoona Asma PST GGP's Siab has deceived the Department and get job through fraudulent background by altering the actual date of declaration of result i.e 17.03.2017 and present fake Degree showing the date of result as 16.09.2016 before cut off date for submission of application to NTS.
2. The SDEO (F) Kohat vide her office communication, sent a MSc Pak Study degree for verification to AIOU Islamabad which was received back duly verified recorded thereon the date of declaration of result 16.09.2016 is also fake as confirm AIOU web site result section.
3. As and when imposture caught publicity the SDEO (F) Kohat once again approached to AIOU Islamabad in response of which the concerned university vide letter dated 16.08.2018 inform the SDEO (F) the required original MSc Pak Study degree may be sent once again the already verified PRC may not be consider.
4. The SDEO (F) vide her letter Endst No.4481-82 dated 01.09.2018 asked the accused teacher to furnish original MSc Pak study degree for onward transmission to AIOU Islamabad. As stated by SDEO (F) Kohat that the accused is reluctant to submit original degree.
5. The pay of accused has been released provisionally but should be stopped forthwith as and when knowing the factual position but instead drawing her pay regularly till date of enquiry.
6. The accused does not appeared before enquiry committee and hesitant to put before them reply of charge sheet and defence.
7. The accused teacher at the time of scrutiny meeting herself presented all credential documents along with MSc Pak study degree duly attested by one bank officer Riaz Mohammad NBP Main Branch Kohat.

Conclusion/Recommendation:

The crux of above discussion we the enquiry committee consistently arrive to the conclusion that the role of accused teacher Mst: Maimoona Asma is absolutely disliking to rules of business and recommended that major penalty of removal from service may be imposed upon her within the ambit of Section-4 E&D Rules 2011.

Rashed      ~~AA~~      



17/16

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2. The pay of accused teacher as per terms and conditions of the appointment order should be recovered by hoke & crock and deposited into Govt. treasury.
3. The complainant Mst. Asma Afzal D/O Muhammad Afzal RO Billitang being a meritorious candidate may be appointed as PST at GGPS Siab.

1. Musarat Fida Incharge Principal GGHSS Babri Banda

Chairperson

*[Signature]*  
25/9/18

2. Najma Sahar Headmistress GGHS Kharmatoo

Member

*[Signature]*

3. Shabana Inam SS GGHSS Junghe Khel

Member

*[Signature]*

4. M. Rashid Khan AP DEO (F) Kohat

Member

*[Signature]*

5. Musharraf Khan SC DEO (F) Kohat

Member

*[Signature]*

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHAT

NOTIFICATION:

WHERE AS, Mst. Mamooni Asma D/O Musaffa Kamal has got appointed Vide this office Endst No.2792-2886 file PST Appnt;(2017) dated 03.05.2017 as PST BPS-12 at GGPS Siab District Kohat by tampering the date of declaration of result in MSc Pak study degree.

WHERE AS the above named teacher was awarded marks of MSc Pak Study Degree. The degree submitted by the teacher concerned was showing result declaration dated 06.09.2016 (Before the closing date of advertisement)

WHERE AS a complainant submitted the photo copy of MSc Pak Study Degree of Mamooni Asma showing result declaration as 17.03.2017 (After the closing date of advertisement)

WHERE AS both the degree i-e with result declaration dated 06.09.2016 and 17.03.2017 were sent to AIOU Islamabad vide registered mail for verification and both were verified.

WHERE AS, both the degrees were re-verified through special messenger i-e SDEO (F) Kohat and degree with declaration dated 06.09.2016 was disowned.

WHERE AS, inquiry committee was constituted Vide this office No.11578-82 dated 04.08.2018 and the committee categorically recommended the penalty of "Removal from service" for accused teacher

WHERE AS, Show cause Notice was issued vide No.3392-93 dated 04.03.2019 and statement of allegation and charge sheet was also served upon the accused teacher but she failed to submit either written reply or presenting her self for personal hearing.

WHERE AS, the accused teacher Mst. Mamooni Asma was again informed Vide this office No.5383 Dated 19.07.2021 to submit written reply of the show cause and ensure her presence for personal hearing before the undersigned on 30.07.2021 but she failed to appear before competent authority for the purpose of forgery and tampering the date of declaration of result degree of MSc Pak study, presented on occasion of PST appointment.

Therefore, the under signed in capacity of competent authority, is absolutely agreed with the recommendation of inquiry committee, and keeping in view available material on record placed in file, in exercise of power conferred upon me, impose major penalty of "Removal from Service" within the ambit of [ & D Rule 2011 Section 4(b)(iii) ab initio.

*Sd/-*  
District Education Officer  
(Female) Kohat

Dated 05/08 2021

Endst No. 4389-95 PF Mamooni Asma

- 1. Copy of the above is forwarded to
- 2. District Education Officer, Peshawar
- 3. DMO (M) Kohat
- 4. SDEO (F) Kohat
- 5. District Account Officer Kohat
- 6. PNH (GGPS) Siab Kohat
- 7. Mst. Mamooni Asma D/O Musaffa Kamal R/O Dillana District Kohat

*Sd/-*  
District Education Officer  
(Female) Kohat