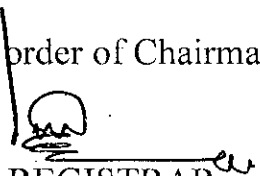


FORM OF ORDER SHEET

Court of _____

Case No. - _____ 1764/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/12/2022	<p>The appeal of Mst. Shehzadi resubmitted today by Mr. Rehman Ullah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and her counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Shehzadi D/O Mir Azam r/o village Kalo Khan Tehsil Razzar Swabi received today i.e. on 29.11.2022 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Copy of proper impugned order dated 23.02.2022 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 2- Copy of impugned order dated 05.8.2022 and departmental appeal against it are not attached with the appeal which may be placed on it.


No. 3427 /S.T.

Dt. 30/11 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Rahmanullah Adv.
Supreme Court of Pakistan at Pesh.

Opinion / Report.

- i) The appellant approached to D.E.O Fernal Swabi several times for providing of proper photocopy of impugned order date 23-02-2022, but the D.E.O Fernal Swabi has failed and neglect the plea of appellant.
- ii) The appellant also approached to ibid officer for providing of proper photo copy of order of departmental appeal. but the D.E.O fernal Swabi has failed to do so and appellant feeling aggrieved and moved an application to Director R.T.I for the same on 2/2/2022. (copy of RTI application is attached on page "36A")
- Copy of impugned order dated 05-8-2022 and department appeal order/decision are hereby attached with grounds of appeal as a annexure "C1"
- 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1764 /2022

Shehzadi.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa,
through Secretary Education and others Respondents


INDEX

S.No.	Description of documents.	Annexure	Page
1.	Memo of appeal with affidavit.		1-6 ^A
2.	Addresses of parties		7
3.	Copy of appointment order	A	8
4.	Copies of salary slips	B	9
5.	Copy of impugned order dated 23.02.2022 & order dated 5-8-2022	C & C1	10, 10 ^A)
6.	Copy of grounds of writ petition and judgment	D	11-22
7.	Copy of departmental appeal & order of appeal.	E, F	23-25 ^A -26-36, 36-A
8.	Wakalatnama		37

Dated:


Appellant

Through


Rahman Ullah
Advocate
Supreme Court of Pakistan

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1764 /2022

Shehzadi _D/O Mir Azam Resident of Village Kalo khan,
Tehsil Razzar, District Swabi _____
.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Education, Civil Secretariat, Peshawar.
2. Director Elementary and secondary Education Peshawar Khyber Pakhtunkhwa.
3. District Education Officer (F), Swabi

....Respondents

**SERVICE APPEAL U/S 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST THE ORDER DATED
23.02.2022 AND Endst. No. 1896-1901 dated
05-08-2022 VIDE WHICH SALARY OF THE
APPELLANT WAS STOPPED WITHOUT
ANY PLAUSIBLE REASON AS WELL
DECLARED THE APPOINTMENT ORDER
OF APPELLANT FAKE AND BOGUS.**

Respectfully Sheweth:-

1) That appellant is a bonafide citizen of Pakistan and is residing at Village Kalo Khan, Tehsil Razzar, District Swabi

2) That the appellant was appointed on the post of Qaria at District Education Office (Female) Swabi on deceased son/daughter quota under Rule 10(4) of the Khyber

Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 after completion

of all codal and legal formalities for the said post. For ready reference, Rule 10(4) is reproduced below:-

"RULE 10(4): Where a civil servant dies or is rendered incapacitated or invalidated permanently during service or retired on medical board, notwithstanding the procedure provided for in sub-rule (2), the appointing authority may appoint one of the children of such civil servant or if the child has not attained the age prescribed for appointment in Government service, the widow or wife as the case may be, of such civil servant, to a posts in any of the basic pay scales 3 to 11 in Provincial cadre post and basic pay scales 3 to 12 in District cadre posts:

Provided that the child or the widow or wife, as the case may be, possesses the minimum qualification prescribed for appointment to the post:

Provided further that if there are two widows or wives of the deceased civil servant, as the case may be, preference shall be given to the elder widow or wife:

Provided also that appointment under this sub-rule is subject to availability of a vacancy and if more than one vacancies, in

different pay scales, are available at a time and the child or the widow or wife, as the case may be, possesses the qualifications eligible for appointment in more than one post, such child or the widow or wife, as the case may be, shall ordinarily be appointed to the post carrying higher pay scale:

Provided also that the provision of this sub-rule shall not be applicable to posts falling within the purview of the Commission.

(Copy of appointment order is attached as Annexure "A")

- 3) That after appointment, the appellant performed her duties to the entire satisfaction of her superiors and since her appointment, there is no complaint whatsoever against appellant.
- 4) That the appellant since her appointment served the Department with the best of her ability and commitment for about three years without any break and was paid her salary vide her pay release with regular deduction of GP Fund. **(Copy of some of salary slips are attached as Annexure "B")**
- 5) That it was to the utmost shock of the appellant, that vide impugned order dated 23.02.2022 issued by respondent No.3, the salary of the appellant was stopped and she was not paid her due salary for her duties. **(Copy of impugned order dated 23.02.2022 is attached as Annexure "C")**
- 6) That on 05-08-2022 the respondent No.03 issued a notification No.1896-1901 and declared and disown the appointment order of the petitioner fake and bogus

(4)

which is vivid clear violation of **Poenitentia, Principle** of natural justice and reproduce in the judgment of Honorable Peshawar high Court as citation No.2017 PLC (C.S) 587.(**Copy Notififaction is attached as Annexur D)**)

- 7) That appointment of appellant was made by the competent authority, thus the impugned order dated 23.02.2022 and 05.08.2022 passed by respondent No.3 is against the law and in violation of the rules on the subject matter.
- 8) That being aggrieved of the said order, the appellant files WP No. 1985-P/2022 before the Hon'ble Peshawar High Court, Peshawar which was decided on 19/08/2022 with directions to the appellant to file a departmental appeal before the proper forum. (**Copy of grounds of writ petition and judgment dated 19/08/2022 is attached as Annexure "E)**)
- 9) That in light of directions passed by the Hon'ble High Court, the appellant filed departmental appeal before respondent No.2, but the same was rejected. (**Copy of departmental appeal & order are attached as Annexure "F")**)
- 10) That being aggrieved, and having no other remedy available, the appellant now approaches this Hon'ble Tribunal against the impugned order dated 23.02.2022 and 05.08.2022 on the following grounds:

GROUND.

- A. That the impugned order dated 23.02.2022 and 05.08.2022 passed by respondent No.3 on the face of it,

is illegal, unlawful, without any lawful authority and is ineffective upon the rights of appellant, as appellant was validly and properly appointed on the post concerned by the competent authority and have performed her duties on the said post for 03 long years without any complaint against her.

B. The appellant was appointed by the competent authority, thus respondent No.3 violated and neglected the order of competent authority and with her malafide intention issued the impugned order regarding the stoppage of salary and disown/declared fake and bogus the appointment order of the petitioner which is clearly misconduct and the respondent is liable for penal consequences.

C. That there is no misconduct and other irregularities available on the whole service record of appellant.

D. That no opportunity of personal hearing was afforded to appellant, which is against the law and natural justice "audi-alteram-partem" "That no one should be condemned unheard"

E. That the impugned Notification is illegal unlawful and against the natural justice.

F. That the petitioner is only earning hand of her entire family and there is no source of income.

G. That equal treatment before law and protection of law is an inalienable right of the petitioner

H. The fair trial is the fundamental right of appellant under article 10A of Constitution of Islamic Republic of

(6)

Pakistan 1973 which is clearly violated by the DEO
Female Swabi.

- I. That as per Article 4 of the Constitution of Pakistan,
1973 all citizens are equal before law.
- J. That as per Article 4 of the Constitution of Pakistan,
1973 the appellant has not been dealt with in
accordance with law.

PAYER

It is therefore, humbly prayed that on acceptance
of this appeal, the impugned order dated 23.02.0222
and 05.08.2022 may graciously be set-aside, be
declared as null and void, and necessary directions be
issued to the respondents to release the past & present
salaries forthwith and also to pay future salaries of
appellant without any break.

Any other relief which this Hon'ble Court deems
appropriate in the circumstances of the case though not
specifically asked for may kindly also be granted.

Dated:

Appellant

Through


Rahman Ullah

Advocate

Supreme Court of Pakistan
&


NIAZ KHAN

ADVOCATE HIGH COURT

(6A)

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this Hon'ble Tribunal.

Deponent

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2022

Shehzadi.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa,
through Secretary Education and others Respondents

ADDRESSES OF PARTIES

APPELLANT

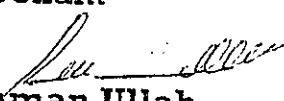
Shehzadi _____

RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Education, Civil Secretariat, Peshawar.
2. Director Elementary and secondary Education Peshawar Khyber Pakhtunkhwa.
3. District Education Officer (F), Swabi


Appellant

Through


Rahman Ullah
Advocate
Supreme Court of Pakistan



DISTRICT EDUCATION OFFICE (FEMALE) SWABI

8

(Office phone & Fax No 0938280339, emisfswabi@yahoo.com)

"A"

APPOINTMENT OF QARIA UNDER DECEASED QUOTA

Consequent upon the powers conferred by the Provincial Govt, recommendation of the Departmental Selection Committee, the undersigned is pleased to appoint the following candidate against the posts of Qaria BPS-12 in Deceased 100% Quota in BPS-12 (Rs. 13320-960-42120) plus usual/allowances under 100% Quota reserved for deceased Sons /Daughters as admissible to her under the rules in the light of notification Issued Vide No:SO(R-VI),E&AD/I-3/2015 Dated 19-04-2016 under policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge.

S#	Name	Father Name	CNIC No	Date Of Birth	Address	Place of Posting
1	SHAHZADI	MIR AZAM KHAN	16201-5914585-6	28-10-1983	VPO Kalu Khan, Swabi	GGHS JALSAI

Terms & Conditions.

1. TA/DA is not allowed to anyone.
2. Charge reports should be submitted to all concerned.
3. Age is automatically relaxed due to her appointment on deceased quota.
4. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the office of the under signed. If anyone found producing bogus certificate will be reported to the law enforcing agencies for further action.
5. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice, their one-month pay/allowances shall be forfeited to the Government.
6. Pay will not be drawn until and unless a certificate to the effect by the Under signed is issued that her/their certificates are verified.
7. They should join their posts within 15 days of the issuance of this notification. In case of failure to join their posts within 15 days of the issuance of this notification their appointments will expire automatically and no subsequent appeal etc; shall be entertained.
8. Health and age certificate should be produced from the Medical Superintendent concerned before taking over charge.
9. They will be governed by such rules and regulations as may be issued from time to time by the Government.
10. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.

(DILSHAD BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Dated Swabi the 11/9 2019

Encls: No 4525-29

Copy of the above is forwarded for information and n/action to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Swabi.
3. District Monitoring Officer (IMU) Swabi.
4. District Accounts Officer, Swabi.
5. Principals/Head Masters concerned schools.
6. Officials concerned.

DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Dist. Govt. NWFP-Provincial
District Accounts Office Swabi
Monthly Salary Statement (January 2022)



B
 9

Personal Information of Mr SHAHZADI * d/o/s of MUR AZAM KHAN

Personnel Number: 00976676 CNIC: 1620159148456
 Date of Birth: 28.10.1983 Entry into Govt. Service: 14.09.2019

NTN:
 Length of Service: 02 Years 04 Months 019 Days

Employment Category: Vocational Temporary

Designation: QARI

80001661-DISTRICT GOVERNMENT KHYBE

DIO Code: SU6246-Head Mistress GGHS Jalsai Swabi

Payroll Section: 003

GPF Section: 001

Cash Center:

GPF AC No:

Interest Applied: Yes

GPF Balance:

67,398.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pa. Scale Type: Civil BPS: 12

Pay Stage: 2

Wage type	Amount	Wage type	Amount
1001 Basic Pay	15,240.00	1001 House Rent Allowance 45%	2,940.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2211 Adhoc Relief All 2016 10%	1,114.00	2224 Adhoc Relief All 2017 10%	1,524.00
2247 Adhoc Relief All 2018 10%	1,524.00	2261 Adhoc Relief All 2019 10%	1,524.00
2309 Adhoc Relief All 2021 10%	1,524.00	2316 Teaching Allowance 2021	2,664.00

Deductions - General

Wage type	Amount	Wage type	Amount
3012 GPF Subscription	-2,220.00	3501 Benevolent Fund	-1,200.00
3534 IR, Ben & Death Comp Fresh	-600.00	3990 Emp. Edu. Fund KPK	-125.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till January-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 32,416.00 Deductions: (Rs.): -4,145.00 Net Pay: (Rs.): 28,265.00

Payee Name: SHAHZADI *

Account Number: 482-00-9

Bank Details: THE BANK OF KHYBER, 080077 YAR HUSSAIN SWABI YAR HUSSAIN SWABI, SWABI

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: SWABI

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email:

Gmail

Search mail

26

10

Fwd: CHANGES ALERT - SU6246 Dated 23.02.2022

Gghsjalsai Su6246

1 min

Urdu

English

Translate message

----- Forwarded message -----

From: Employee Services <SERVICES@ndrc.gov.pk>

Date: Wed, Feb 23, 2022, 5:09 PM

Subject: CHANGES ALERT - SU6246 Dated 23.02.2022

To: <GGHSJALSUISU6246@gmail.com>

00926676 SHAHZADI *

00926676 LEAVING ACTION PERFORMED (SALARY STOPPED) with effect from 01.02.2022.

00926676 DESIGNATION CHANGED to 99999999 - PRIMARY SCHOOL TEACHER

میں شامل سائز میں کسی پیسٹر میں کوئی غلطی پتہ جاری ہو، تو حکم از حکم اپنے متعلقہ اکاؤنٹ اس سے رابطہ کر کے درستگی کروالیں

"E1" 27 10(a)



DISTRICT EDUCATION OFFICE (FEMALE) SWABI

Phone No: 0938-280339

Email: emsfswabi@yahoo.com



[/deofswabi](#)



Notification:

1. Whereas the competent authority MS: SOFIA TABASSUM DEO (F) Swabi, during perusal of record, got suspected on her initial recruitment and found that some teachers of various cadres (CT, CT-IT, TT Qaria), have been appointed on extraneous grounds during 2019 & 2020.
2. AND Whereas, the office constituted a fact-finding enquiry committee vide DEO (F) Swabi Endstt No 462 Dated 14/02/2022 and Endstt NO 658-61 Dated 04-03-2022.
3. AND whereas the committee carried out a comprehensive enquiry wherein a full opportunity of defense without any prejudice and fear of reprisal, was provided to the teacher under enquiry. The committee submitted its report to the competent authority wherein the committee submitted its report to the competent appointment orders flying, fake and bogus. The main apple of discord behind the whole illegal flying, fake and bogus in the office has been declared as Suleem Akhtar Ex APO.
4. AND Whereas the DEO (F) Swabi sent a report regarding appointments on extraneous grounds to the worthy Director E & Sec Education Peshawar consequent upon which vide Endstt No. 789-92/A-23/complaint /Mardan vol-II/2021 Dated Peshawar, Mr. Sharif Gul Principal BPS-19 was nominated as enquiry officer.
5. AND Whereas the enquiry officer conducted his enquiry, wherein he affirmed and agreed with the enquiry report already conducted by DEO (F) Swabi as mentioned above, submitted to the Director E & SED Khyber Pakhtunkhwa vide No. 116 Dated 29/06/2022.
6. AND Whereas the Director E & SED Peshawar, directed the undersigned to disown the appointment order of fake and bogus teachers vide No 1577/A-23/MS/complaint/ Mardan/vol-II/2021/KC.
7. AND Whereas MS: SHAH/ADI Qaria GGHS Jalsai (Swabi) was appointed as Qaria (Diseased) Quota vide Endstt No 4525-29 dated 11/09/2019 and posted at GGHS Jalsai (Swabi). Her father was neither an employee of E & SE department nor died during service. She got married in May 2001. No record exists on file.
8. Now therefore, in exercise of Powers conferred under the Khyber Pakhtunkhwa Govt servant (Efficiency and discipline) rules, 2011. I. MS: SOFIA TABASSUM DEO (F) Swabi, being competent authority, am of the opinion to disown the flying, fake and bogus appointment order in r/o MS: SHAZADI Qaria GGHS Jalsai (Swabi) in the best public interest.

(SOFIA TABASSUM)
District Education officer
Female Swabi

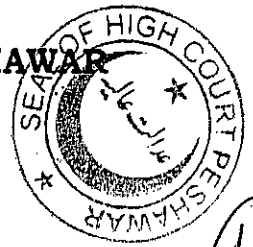
Endst. No. 1896-1901 /File, Dated: 05/08/2022

Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Department KPK Peshawar.
2. District Account Officer Swabi.
3. District Monitoring officer Swabi.
4. Superintendent local office.
5. Principal GGHS Jalsai (Swabi)
6. MS: SHAH/ADI D/O Mir Azam Khan (L) VPO Kalu Khan, Tehsil: Razar District Swabi under register cover.


District Education officer
Female Swabi

BEFORE THE PESHAWAR HIGH COURT PESHAWAR



WRIT PETITION NO 1985-P OF 2022

Mst: Shehzadi Daughter of Mir Azam

Resident of Village Kalu Khan, Tehsil Razzar District

Swabi / Qaria Government Girls .

(Petitioner)

VERSUS

1. District Education Officer (Female) District Swabi.
2. District account Officer Swabi District swabi.
3. Director Elementary & Secondary Education Khyber Pakhtoonkhwa at Peshawar.
4. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.

{Respondents}

WRIT PETITION UNDER ART 199 OF
THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN 1973.

Respectfully Sheweth;

**Facts giving rise to the present writ
petition are as under:-**

FACTS :-

ATTESTED
EXAMINER
Peshawar High Court

1. That the petitioner hails from a respectable
family where his father out of his meager

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27 MAY 2022

INCHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

resources could manage to provide her education, so that to live her life happily and honourably. Education qualification of the petitioner is MA Islamiyat.

12

(Copy of DMC of MA Islamiyat of the petitioner is attached as annexure A).

2. That the petitioner applied to the respondent No 1, for appointment in education department under deceased son / daughter quota and after fulfillment of all legal and coddle formalities the petitioner was appointed as qaria on regular basis in BPS 12 by the predecessor of respondent No 1 vide order Endst: No 4525-29 dated 11-09-2019.

(Copy of the appointment order is attached as Annexure B).

3. That after medical examination and fulfillment of all formalities, the petitioner assume her charge on dated 14-09-2014 at GGHS Jalsai District Swabi and in the light of appointment order and joining duty service book of the petitioner was prepared by the competent authority.

(Cop of Medical Certificate & Charge Report are attached as Annexurs C & C1 while copy of service book is attached as annexure C2)

FILED TODAY

27 MAY 2022

INCHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

ATTESTED
EXAMINER
Peshawar High Court

4. That the petitioner was regularly performing her duty and receiving her salary vide her pay release with deduction of GP funds, when in the month of February 2022, her salary was stopped through pay code No.00926676 without any reasons.

(Copy of pay release order and pay slip etc are attached as Annexure D, D1 while impugned notification of the Pay code for stoppage of salary of the petitioner is attached as annexure D2).

5. That after that, the petitioner was again regularly attending and serving in her place of duty ie GGHS Jalsai but despite doing her duty, salary was not paid to the petitioner for the month of February 2022, and on wards till now.

(Copy of the register of attendance of the school is attached as annexure E).

6. That the petitioner submitted application to the respondent No 1, for the release of her pay/ salary on dated 25-03-2022, which application was entered vide diary No 855 dated 25-03-2022 but yet not responded.

(Copy of the application is attached as annexure F).

FILED TODAY

27 MAY 2022

IN CHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SIWASI

7. That feeling aggrieved from the stoppage of the pay/salary of the petitioner by the respondent

ATTESTED
EXAMINER

Peshawar High Court

No 141 the petitioner have no other alternate, efficacious and adequate remedy, but to approach to this Hon"ble court, inter alia on the following grounds:

GROUND S :-

A. That the impugned order / Notification of the stoppage of the pay/salary of the petitioner through pay code dated 23.02.2022 with effect from 01.02.2022 of the petitioner by the respondents are illegal, unlawful, without lawful authority, void ab initio and is liable to be set aside.

B. That the respondent No 142 have issued the illegal order / notification mentioned above in the hasty manners and without any reasons, which is against the law, rules, code and violation of the natural justice.

C. That the impugned order / notification of the stoppage of the salary of the petitioner through pay code is arbitrary, mechanical and without application of mind to the

FILED TODAY

27 MAY 2022

INCHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

ATTESTED
EXAMINER
Peshawar High Court

policy of departmental actions which attitude of the respondents have caused a serious miscarriage of justice and has deprived the petitioner of what she had the right.

D. That the petitioner has committed no offence / wrong and order of the stoppage of the salary of the petitioner is wrong, incorrect and very harsh.

E. That the petitioner is entitled to receive her pay/salary as she is regularly attending her school and rendering her services.

F. That neither summon, notice nor proper opportunity of hearing has been given to the petitioner by the respondent No I, in connection of the stoppage of her salary and illegal order / notification through pay code has been issued which act is illegal, unlawful, without lawful authority and the same is liable to be quashed/ set aside.

FILED TODAY

27 MAY 2022

IN CHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SIYABI

ATTESTED
EXAMINER
Peshawar High Court

G. That appointment order of the petitioner is correct, legal and valid being issued after fulfillment of all legal and coddle formalities and no wrong/ offence what's over has committed and if any wrong was committed then why the petitioner was not informed and proceeded as neither summon, notice nor proper opportunity of hearing has been given to the petitioner by the respondent No I, and the petitioner was kept in dark till now of any legal / departmental proceedings and ex-parte and illegal order / notification of the stoppage of the salary has been issued which act is illegal, unlawful, without lawful authority void ab-initio and the same is liable to be set aside.

~~ATTESTED~~
EXAMINER
Peshawar High Court

H. That the petitioner has not been treated according to law and illegal, ex-parte, and harsh illegal order of the stoppage of the salary has issued against the

FILED TODAY

27 MAY 2022

INCHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

petitioner which is never tenable under the law, rules and constitution.

I. That the poor petitioner is the only source of income of her whole family is victimizing on no ground and even without any reasons, the petitioner was deprived of their halal pay/salary during the holy month of Ramdan and Eid-ul-fitr, which is tantamount to extreme abuse and starvation of petitioner including her family, which biased treatment speaks a lot of the malafide on the part of the respondent No I, and it is a willful harassment, deprivation of legal rights which even the constitution of the Islamic republic of Pakistan, 1973, does not allow.

J. That fundamental right of the petitioner to be dealt in accordance with law, equal treatment and to be provided equal protection of law, but respondent No I, has exceeded his power and violated the

FILED TODAY

27 MAY 2022

IN CHARGE, SUB REGISTAR
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

ATTESTED
EXAMINER
Peshawar High Court

law, rules, code and for the reasons the impugned order/ notification/ direction is illegal, null and void in the eye of law and is not maintainable hence liable to be set aside.

K. That any other grounds not specifically raised will be taken and argued during the course of arguments with the permission of this august court.

It is, therefore, most humbly prayed that on acceptance of the instant writ petition, the impugned order/ notification dated 23.02.2022 of the respondent No I, of the stoppage of the salary of the petitioner with effect from 01.02.2022 may kindly be set aside and the respondents be directed to release the monthly pay/salary of the petitioner from the date of the stoppage till date and the petitioner may also be given present / current and future pay/salary for her duties.

The respondents may also be directed not to take any other adverse action against the petitioner

FILED TODAY

27 MAY 2022

INCHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY QAWABI

ATTESTED
EXAMINER

Peshawar High Court

Any other relief which this August Court deems appropriate according to the circumstances of the case may kindly be awarded to the end of justice.

Dated : 28/05/2022

Petitioner Through :-

Muhammad Ashfaq Khan
Advocate High at Judicial
Complex Shah Mansoor
Swabi District Swabi
Cell No 0345 9507441

INTERIM RELIEF

It is humbly prayed that the operation of the impugned order / notification for stoppage of the salary of the petitioner through pay code 00926676 dated 23-02-2022 with effect from 01.02.2022 be suspended and salary of the petitioner be ordered to be released and the respondents be also directed not to take any other adverse action, till the final decision / disposal of the instant writ petition.

Muhammad Ashfaq Khan
Advocate High Court
Distt Courts (Swabi)

NOTE:

The petitioner repeatedly contacted the respondents to provide her with the relevant documents and conclusive details per policy, but she was refused the same.

Advocate

27/05/2022

Muhammad Ashfaq Khan
Advocate High Court
Distt Courts (Swabi)

FILED TODAY

27 MAY 2022

INCHARGE SUB REGISTRAR
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

ATTESTED
EXAMINER
Peshawar High Court

CERTIFICATE

Certified that as per instruction of my client no such like constitutional petition has earlier been filed by the petitioner in this Honourable Court.

[Signature]
Muhammad Ashfaq Khan
Advocate High Court
at Judicial Complex Swabi

MUHAMMAD ASHFAQ KHAN
Advocate High Court
Distt. Courts (Swabi)

LIST OF BOOKS

- A. Constitution of Islamic Republic of Pakistan .
- B. Any other law books according to need.
- C. Case Law.

[Signature]
Advocate

MUHAMMAD ASHFAQ KHAN
Advocate High Court
Distt. Courts (Swabi)

ATTESTED
EXAMINER
Peshawar High Court

FILED TODAY

27 MAY 2022

INCHARGE JUB REGISTRAR
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

21

WRIT PETITION NO 1985-POF 2022

MST: SHEHZADI D/O MIR AZAM KHAN

Resident of Village Kalu Khan, Tehsil Razzar District Swabi.

(Petitioner)

VERSUS

D.E.O Female Swabi and others

(Respondents)

AFFIDAVIT

I Mst: Shehzadi Daughter of Mir Azam Khan resident of Kalu Khan Tehsil Razzar District Swabi, the petitioner, do hereby solemnly affirm and declare on oath that contents of the Constitutional Writ Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this August Court .

Deponent

[Signature]

Mst Shehzadi

CNIC NO 16201-5914585-6

Cell No 03159705207

FILED TODAY

27 MAY 2022

IN CHARGE, SUB REGISTRY
PESHAWAR HIGH COURT PESHAWAR
DISTRICT JUDICIARY SWABI

Identified by:

Muhammad Ashfaq Khan
Advocate High Court
at Judicial Complex Swabi
Cell No 03459507441

MUHAMMAD ASHFAQ KHAN
Advocate High Court
District Judiciary Swabi

No. 19581

Certified that the above was verified on solemnly affirmation before me in the office, this 27 day of May 2022 by Mst. Shehzadi

27 MAY 2022

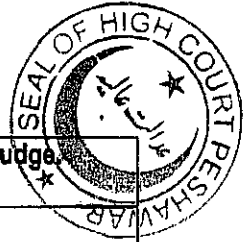
s/o Mir Azam Khan identified by Muhammad Ashfaq Khan who is permanent known to me

OATH COMMISSIONER
Peshawar High Court Peshawar Sub-Registry, District Judiciary Swabi

ATTESTED
EXAMINER
Peshawar High Court

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET



Date of Order of Proceedings	Order of other Proceedings with Signature of Judge
1	2
<p align="center">19.08.2022</p>	<p>WP No.1985-P-2022</p> <p>Present: Mr. Rehman Ullah Khan, Advocate, for the petitioner Rabnawaz Khan, AAG for respondents.</p> <p align="center">****</p> <p>SHAKEEL AHMAD, J:- Through the instant petition filed under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973, the petitioner has challenged Notification dated 23.02.2022, whereby her salary has been stopped.</p> <p>At the very out, the learned AAG representing the respondents produced copy of notification dated 05.08.2022 reveals that after a proper inquiry her appointment was found as Bogus and fake and she is not in the strength of the education department. Learned counsel for the petitioner was shown the said notification, he stated that he does not press the instant petition on merit provided he is allowed to appear before the proper forum. Hence dismissed being not pressed.</p>

60033

Date of Presentation of Application: 24/11/2022

No of Pages: 19

Copying fee: 18/-

Total: 18/-

Date of Preparation of Copy: 24/11/2022

Date of Delivery of Copy: 24/11/2022

Received By: M.A. 50064

JUDGE

Kamran

JUDGE

[Signature]

DB-Hon'ble Mr. Justice Shakeel Ahmad & Hon'ble Mr. Justice Kamran Hayat Miankhel.
Ayub. CS

CERTIFIED TO BE TRUE COPY

EXAMINER

24 NOV 2022

3 2
E
=

23

To,

Director Elementary and secondary Education Peshawar Khyber
Pakhtunkhwa

SUBJECT: REPRESENTATION/APPEAL AGAINST ODER

DATED 23-02-2022 and Order dated 5-8-2022

Respected Sir,

1. That the applicant appointed on the post of Qaria at District Education Office (Female) Swabi on deceased son/daughter quota under **Rule 10(4) of the khyber pakhtunkhwa civil servants (appointment, promotion & transfer) rules, 1989** after completion of all codal and legal formalities for the said post.

RULE 10(4): *Where a civil servant dies or is rendered incapacitated or invalidated permanently during service or retired on medical board, notwithstanding the procedure provided for in sub-rule (2), the appointing authority may appoint one of the children of such civil servant or if the child has not attained the age prescribed for appointment in Government service, the widow or wife as the case may be, of such civil servant, to a posts in any of the basic pay scales 3 to 11 in Provincial cadre post and basic pay scales 3 to 12 in District cadre posts:*

Provided that the child or the widow or wife, as the case may be, possesses the minimum qualification prescribed for appointment to the post;

Provided further that if there are two widows or wives of the deceased civil servant, as the case may be, preference shall be given to the elder widow or wife:

Provided also that appointment under this sub-rule is subject to availability of a vacancy and if more than one vacancies, in different pay scales, are available at a time and the child or the widow or wife, as

the case may be, possesses the qualifications eligible for appointment in more than one post, such child or the widow or wife, as the case may be, shall ordinarily be appointed to the post carrying higher pay scale: Provided also that the provision of this sub-rule shall not be applicable to posts falling within the purview of the Commission.

2. That I have been performed my duties as a teacher with the entire satisfaction of my high-ups since 2019 and no complaints as such as filed against me and there is no absentia available during my service period.

3. That there is no misconduct and other irregularities available on my whole service record while performed my duty regularly and with punctuality.

4. That the appellant served in Department with the best of his ability and commitment for about three years.


5. That the appellant was regularly performing her duty and receiving her salary vide her pay release with deduction of GP Fund.

6. The appellant appointed by the competent authority and then the respondent DEO Female violated and neglected the order of competent authority ultra virus and mala fide issued the impugned order regarding the stoppage of salary which is clearly misconduct and the respondent is liable for penal consequences.

7. That there is no opportunity of being heard was given to the appellant which is against the law and natural justice 'audi alteram partem' (That no one should be condemned unheard)

- 8. The fair trial is the fundamental right of appellant under article 10A of Constitution of Islamic Republic of Pakistan 1973 which is clearly violated by the DEO Female Swabi.
- 9. That on meanwhile the District Education Office (Female) Swabi issued ultra virus and mala fiddy impugned order dated 23/02/2022 regarding stoppage of salary through pay Code No. 00926676 without giving any prior show cause notice and being heard.
- 10. That the applicant file writ petition No. 1985-P/22 before the peshawar high court Peshawar which is decided on 19.8.2022 and direction was given to the applicant to file a departmental appeal before the proper forum.
- 11. That the impugned Notification is illegal unlawful and against the natural justice.
- 12. That the petitioner is only earning hand of his entire family and there is no source of income.
- 13. That equal treatment before law and protection of law is an inalienable right of the petitioner.
- 14. That being aggrieved from the instant order, I approached before your worthy office for redressal of my grievance and may kindly accept my appeal.

It is, therefore, requested that the notification Dated 23-02-2022 may kindly be cancelled and release the pay of the applicant.

Yours Obediently,

 Shahzadi

"F" 23

Subject: APPEAL

Memo:

Reference your good office No 4038F.No16/Vol-1/F/Appeal/Swabi, Dated Peshawar the 21-09-2022 the detail report views comments are as under,.

That the appointment order of Mst. Shahzadi Qaria (Deceased) quota vide endst.No 4525-29 dated Swabi the 11-09-2019 was fake, flying and bogus. This her appointment order was rightly disowned by the competent authority .

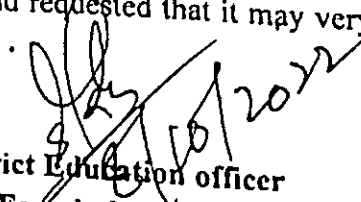
An inquiry committee was ordered inquiry conducted. An ample opportunity of defuses was provided to the appellant. On perusal of record , nothing exist on proper file in DAO Swabi photocopies of her record exist with no proper evidence . the most interesting fact in neither her father belong to Elementary and secondary Education Department nor died during service.it was revealed during proceeding that her father belonged to Jail Police. The appellant got married in May 2001 and has joined another family now.. according to the appellant her father was died on 11-04-2000. No documents /due approval exists on file for availing this quota.

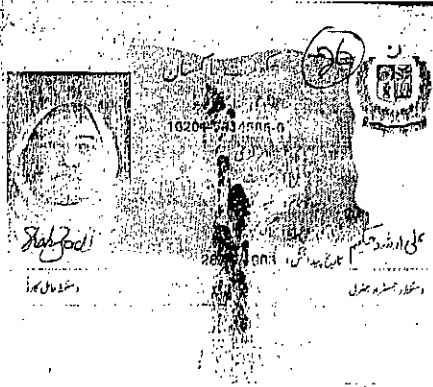
She could not reply the questioner confidently she named died person, her brother-in law and Late:- & Safdar Assistant DEO (F) Swabi, who facilitated her appointment she also failed to provide necessary relevant documents orally, she admitted if the matter finisher up with her resignation from the post she is ready to do so.

The teacher could not preset her original appointment order pay release order , father death and service certificate any approval to be appointed against the deceased quota in Elementary and secondary Education Department or any other authentic documents which may justify her appointment. The disown order is as speaking.

she failed a writ petition in the Peshawar High Court which was Dismissed. The appointment order 07 teachers including the appellant are vide ab initio with any legal effect, the appointment order were found flying, fake and bogus this the competent authority disowned them inquiry is attached.

Report is hereby submitted for your kind perusal and requested that it may very graciously be rejected.


District Education officer
Peshawar



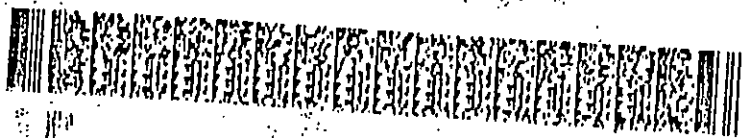


T74G0C 16201-5914585-9

شماره پستی: 16201-5914585-9
مستوفی امور پستی، کسب و کار، کسب و کار، کسب و کار

16201-5914585-9

تاریخ تسویه: 19/04/2022
تاریخ اجراء: 19/04/2012
آشہ کاروانے بر حسب لیٹر بکس میں مال دیں



رقم التسجيل ١٠٥٤

بسم الله الرحمن الرحيم
كلية شريعة الفقه والحديث
التجويد القران الكريم

٥٧

دار العلوم سيدنا ابراهيم صديق رضي الله عنه بدرشي فوشوره

عام 2016 رقم التسجيل 479 رقم الجلوس

اسم الطالبه شهزادي اسم الوالد مير اعظم

تاريخ الميلاد 10 - 10 - 1983 المديرية صوالي

مكتسبة	الدرجات	المادة
82	100	الترتيل
90	100	الحذر
80	100	كتب التجويد
76	100	اجراء التجويد
95	100	فقه وحديث
98	100	ترجمة (سورة الفاتحة الى سورة الاحقاف)
520	٦٠٠	مجموع الدرجات

تشهد دار العلوم سيدنا ابراهيم صديق رضي الله عنه الطالبة المذكورة قد نجحت في امتحان النهائي بتقدير ممتاز وصلى الله على سيدنا محمد وآله وصحبه وسلم
المكتب الرئيسي

تاريخ الامتحان 15 - 30 - 2016

دار العلوم سيدنا ابراهيم صديق رضي الله عنه

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

التشهاد

للتجويد والقراءة

دار العلوم سيدنا ابوبكر صديق
منطقة سيدنا عثمان بن عفان
بشارشي نوشهروفيش

التاريخ ١٥-٣-٢٠١٦
الشارح

بسم الله الرحمن الرحيم
الحمد لله الذي جعل القرآن الكريم آية من آياته
وآية من آياته التي لا تحصى ولا تعد
والله ولي التوفيق

دار العلوم سيدنا ابوبكر صديق

تشهد بان الطالب **محمد زوي** في سنة ١٩٨٣ م ٢٨٠٤٠٤ هـ الموافق ٢٠١١ م قد قرأت القرآن الكريم مع
المولوي دة في ١٩٨٣ م ٢٨٠٤٠٤ هـ الموافق ٢٠١١ م وقد قرأت القرآن الكريم مع
التجويد على قرءة الامام عاصمي الكوفي رحمه الله تعالى (برواية حفص) في المدرسه و فازت في
اختبارها النهائي بتقديمها عام ١٤٣٢ هـ الموافق ٢٠١٢ م وبناء على ذلك تمنحها الادارة هذه
الشهادة، وتوصيها بتقوى الله عز وجل في السر والعلانية وتتضرع الى الله تعالى ان يوفقها
بتعاهد القرآن الكريم وتعاليمه وان لا تنساني في دعواتها الصالحة والله ولي التوفيق

توقيع المدير
د. طارق سلمان احمد
1057

توقيع المعلمه

ختم الاداره
دار العلوم سيدنا ابوبكر صديق
طريق سيدنا عثمان بن عفان بشارشي

102445

Serial No: _____

Roll No: 20586

(29)



PESHAWAR

DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination: _____

A 2001

Name: _____

Sheh Zadi

Father's Name: _____

Mir Azam

Institution/District: _____

Date of Birth: _____

SUBJECTS	Marks Obtained						Remarks
	Max:	P/M	Theory	Practical	Total	P/F	
English	150	49			70		
Urdu	150	49			74		
Islamyat (Comp)	75	25			59		
Pak. Studies	75	25			31		
Riazi (New)	100	33			44		
General Science	100	33			64		
<u>15</u>	100	33			68		
<u>P</u>	100	33			42		
Total	850				452	-c	

Total (in words): _____

Four Hundred and Fifty Two

Prepared by: _____

[Signature]

Checked by: _____

[Signature]

Dated: _____

12 JUN 2001

Controller of Examinations
Board of Intermediate and Secondary
Education, Peshawar.

Note: Errors/Omissions excepted

S. No. 1041

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION PESHAWAR
PROVISIONAL CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION



Peshawar N.W.F.P. Pakistan

Session: 2001-02 Annual

THIS IS TO CERTIFY THAT SHAHZADI
 Daughter of MIR AZAM
 and a candidate of SWABI DISTRICT
 has passed the Secondary School Certificate Examination of the
Board of Intermediate and Secondary Education, Peshawar held in March, 2001
 as a Private candidate. She obtained 452 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. Science | 7. Pashto | 8. Islamic Studies |

Date of birth according to admission form is 28 October 1988

Prepared by Computer Cell

Checked by _____

Date of Preparation: 14/09/2001

(Signature)

Joint Secretary (General)
 Board of Intermediate and Secondary Education,
 Peshawar



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MARDAN N.W.F.P PAKISTAN

S. No. MB 043615

(31)

Roll No: 35819

Registration No: _____

PROVISIONAL AND DETAILED MARKS CERTIFICATE
INTERMEDIATE (ANNUAL) EXAMINATION- 2006
HUMANITIES (Part-II)

SHAHZADI Son/Daughter of MIR AZAM KHAN

of Institution/District SWABI

has secured the marks shown against each subject in the Higher Secondary School Examination held in the month of MAY/JUNE as PRIVATE Candidate.


Subjects	Marks	Marks Obtained						
		Part-I		Part-II		Total	Marks in Words	
		Theory	Pract	Theory	Pract			
English	200	33	--	30 *	--	63	Sixty-Three	
Urdu	200	49	--	50	--	99	Ninety-Nine	
Islamic Education	50	29	--	--	--	29	Twenty-Nine	
Pakistan Studies	50	--	--	28	--	28	Twenty-Eight	
Islamic History	200	33	--	45	--	78	Seventy-Eight	
Islamic Studies	200	73	--	52	--	125	One Hundred Twenty-Five	
Pashto	200	57	--	66	--	123	One Hundred Twenty-Three	
Total : 1100							545-D	Five Hundred Forty-Five Only
							Remarks :	* Passed with grace marks

Prepared by : 

Checked by : 

Result Date: 05 August, 2006

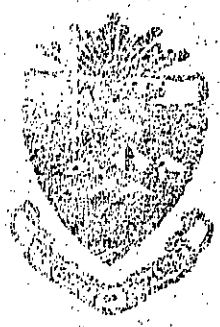
Note: Error/Omission accepted. Any mistake in above particulars must be intimated within 30 days after declaration of result.


Controller of Examinations
BISE Mardan

013197

University of Peshawar

32



Pakistan
Detailed Marks Certificate
Bachelor of Arts



Part-II
Supply Examination 2010
District Swabi

Private

Name: SHAH ZADI

Gender: Female

Roll No: 30717

Father's Name: MIR AZAM KHAN

Registration No: 2007-PC-6208

Division: 3rd

Papers	Max Marks	Marks Obtained		
		In Figures	In Words	
English (Comp)	75	24	Twenty Four	
Pashto	75	25	Twenty Five	
Islamic Studies	75	55	Fifty Five	
Pakistan Studies	40	16	Sixteen	
Part-I	58056:Annual-2011	285	115	One Hundred and Fifteen
Part-II		550	235	Two Hundred and Thirty Five

Errors & omissions are subject to subsequent rectification

Chances Availed: 3

The Examination was taken In Parts

Examination held From 29-Oct-2010 to 29-Jan-2011

Result Declared on October 04, 2011

Issue Date: 04-Oct-2011

12:45 pm

(Iftekhar Hussain Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Computerized by RTC

Kamal Sher Killi Area



University of Peshawar

Pakistan

Detailed Marks Certificate

Master of Arts in Islamiyat

Final

Annual Examination 2013

District Swabi



Private

Name: SHAH ZADI

Gender: Female Roll No: 37182

Father's Name: MIR AZAM KHAN

Registration No: 2007-PC-6208

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al Quraan Translation 2nd Half & Com with Grammar-VI	100	62	Sixty Two
Principles of Islamic Jurisprudence-VII	100	47	Forty Seven
Islam & Other World Religions-VIII	100	55	Fifty Five
Kalam & Philosophy of Islam-IX	100	52	Fifty Two
Islam, Modren Thought & Islamic Law of Inheritance-X	100	43	Forty Three
Viva Voce	100	55	Fifty Five
Previous 18711:Annual-2013	500	286	Two Hundred and Eighty Six
Final	1100	600	Six Hundred Only

Errors & omissions are subject to subsequent rectification.

Chances Availed: 1

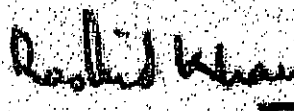
The Examination was taken As a Whole

Examination held From 21-Aug-2013 to 30-Sep-2013

Result Declared on Friday, January 17, 2014

Issue Date: 17-Jan-2014

6:50 pm


 (Prof. Dr. Rashid Khan)
 CONTROLLER OF EXAMINATION
 UNIVERSITY OF PESHAWAR

Computerized by RTC

Swabi Area

DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in N.W.F.P. having belonged to it by birth / settled in it.

34

I belong by birth to Village / Mohallah YASUDI MOH. DHERI SAR
Tehsil LAHOR.....District SWABI.

SHAHZADI

Signature of the applicant

Dated 21 / 12 / 2007

Pursuance to the declaration dated 21 / 12 / 2007 filed by SHAHZADI W/O son/daughter of SHER RAHMAN domiciled in the N.W.F.P., it is hereby certified that the said SHAHZADI is born of parents who are permanent residents of the N.W.F.P., having belonged to it by birth/settled in it.

I have satisfied myself from personal/my knowledge verification that the above declaration is true and certify.

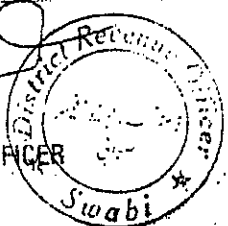
This 27th day of Dec 2007

DEPUTY DISTRICT REVENUE OFFICER
SWABI / LAHOR

Deputy Dist. Officer
(District) Swabi

COUNTERSIGNED

DISTRICT REVENUE OFFICER
SWABI.



عزنا علی

جناب صدری کیانی سے شہزادی زویبہ الرحمن سرگودھا کے لیے یا شہزادگان

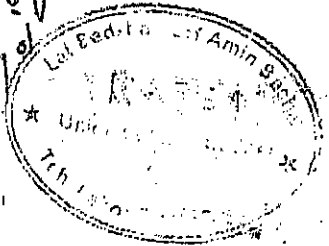
مذکورہ نکلوریا فیکس و پیدائش یا شہزادگان کے لیے یا کنڈل سے

دور افغان یا فہا پریس سے ایورڈ کے لیے

35

کلمہ یا ہ شامہ

۱۹/۱۹



جناب عالی! حسب لکھنے لعل بادشاہ ناظمیہ کے ساتھ شہزادی زویبہ سرگودھا

موصوفیہ کی اصل دستاویزوں کی کاپی حاصل کی جا رہی ہے۔

منذوب

22/12/20

Handwritten signature and date in a circular scribble.

VERIFIED AS ABOVE

DEPUTY COMMISSIONER

Muzaffargarh



حکومت خیبر پختونخوا پاکستان
Govt. Khyber Pakhtunkhwa Pakistan



36

اندراج وفات سرٹیفکیٹ

Death Registration Certificate

Tracking Id: 91100007168431
CRMS No. D621751016
OLD/M REG #.

دفتر اندراج : Kalu Khan V_1000742

Old CRMS No. :

Deceased Person's Details متوفی کے کوائف

Name :	Mir Azam Khan	نام :	میر اعظم خان
Nationality :	Pakistan	قومیت :	پاکستان
CNIC No :		شناختی کارڈ :	
Date of Birth :	10-Sep-1956	تاریخ پیدائش :	10-Sep-1956
Gender :	Male	جنس :	مرد
Religion :	Islam	مذہب :	اسلام
Sickness Period :	01 Days 00 Months 00 Years	مدت علالت :	01 دن 00 ماہ 00 سال
Date of Death :	11-Apr-2000	تاریخ وفات :	11-Apr-2000
Date of Burial/Last rite :	11-Apr-2000	تاریخ تدفین/آخری رسومات :	11-Apr-2000
Place of Death :	Kalu Khan	جائے وفات :	کالو خان
Reason of Death :	Natural	وجہ وفات :	قدرتی
Nature of Death :	Normal	کیفیت وفات :	عادی
Buried/Last rite at :	Kalu Khan Moqbara	جگہ تدفین/آخری رسومات :	کالو خان مقبرہ

Parental Information والدین کے کوائف

Father's Name :	Zarif Khan	والد کا نام :	ظریف خان
CNIC No :		شناختی کارڈ :	
Mother's Name :	Zaroo Bibi	والدہ کا نام :	زرو بی بی
CNIC No :		شناختی کارڈ :	

Address پتہ

Address :	parrah Village Kalu Khan	پتہ :	پرڑہ گاؤں کالو خان
Telasil :	Razzar	تحصیل :	رزڑ
District :	Swabi	ضلع :	صوابی

Applicant's Details درخواست دہندہ کے کوائف

Name :	Mukhtar Ali	نام :	مختیار علی
CNIC No :	16202-0939596-1	شناختی کارڈ :	16202-0939596-1
Relation with Deceased :	Son	متوفی سے رشتہ :	بیٹا

Information of Burial/Last rite by تدفین/آخری رسومات کنندہ کے کوائف

Name :	Mukhtar Ali	نام :	مختیار علی
CNIC No :	16202-0939596-1	شناختی کارڈ :	16202-0939596-1
Relation with Deceased :	Son	متوفی سے رشتہ :	بیٹا

Entry Date :	16-Aug-2022	تاریخ اندراج :	16-Aug-2022
Issue Date :	16-Aug-2022	تاریخ اجراء :	16-Aug-2022
Entry Status :	Normal	اندراج اسٹیٹس :	نارمل
Additional Information :		اضافی معلومات :	

دستخط سیکریٹری
ویلج کونسل کالو خان 5
تحصیل رزڑ ضلع صوابی
رسول اللہ

SECRETARY
Village Council
Kalu Khan
District Swabi
SECRETARY



To,

36-A

The Director right to information

K.P. Peshawar.

Subject: Application for proper photocopy of
impugned order dated 23/02/22 and
proper photocopy of decision of appeal
passed by District Education Office [Female].

Respectfully Sheweth,

That the Applicant submitted as under;

- 1) The Applicant was appointed on 11/09/2019 in Education Department Swabi.
- 2) The District Education Office stopped the salary of applicant on 23/02/2022 from which she feeling aggrieved while the D.E.O Female has failed to handed over the proper photocopy of salary stopage.
- 3) The Applicant moved departmental Appeal to the Director Elementary & Secondary Education KPK, which was rejected and the Applicant required proper photocopy of order of Appeal.

It is therefore humbly stated that on the acceptance of this Application, the worthy Director RTI may kindly directed to (D.E.O Female Swabi) to provide proper photocopy of order dated 23/02/2022 and order of Appeal.

Dated: 02/02/2022

Applicant:

Shehzadi D/O Mir Azam, R/O Kaku
Khan vill, Tehsil Razzar, District
Swabi.
Phone: 0335-0998442

