

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 875/2019

Date of Institution ... 03.07.2019

Date of Decision ... 22.09.2021

Mst. Nabeela Afridi, PST, GGPS Mari Kor, Pandiali, District Mohmand
... (Appellant)VERSUSThe Director (E&SE) Government of Khyber Pakhtunkhwa, Peshawar and
two others. ... (Respondents)Present.Mr. Noor Muhammad Khattak,
Advocate.

... For appellant.

Mr. Muhammad Adeel Butt,
Addl. Advocate General

... For respondents.

MR. AHMAD SULTAN TAREEN
MRS. ROZINA REHMAN,... CHAIRMAN
... MEMBER(J)JUDGMENT

AHMAD SULTAN TAREEN, CHAIRMAN:-The appellant named above invoked the jurisdiction of this Tribunal through service appeal described above in the heading challenging thereby her removal from service dated 18.10.2013, communicated to her on 04.03.2019 during proceedings before this Tribunal in Service Appeal No. 1172/2018.


2. The factual account as given in the memorandum of appeal is summed up as hereinafter follows. The appellant was appointed as PST in the respondent department in the year, 1993. She while serving at GPS



Tarkho Bajaur Agency was transferred and posted at GFCS Spinki Tangi Mohmand Agency, vide order date 06.08.2007. The appellant assumed charge at her new assignment and started performing her duty. LPC was also issued in her favour by the concerned authority. The appellant was then transferred to GGPS Mari Kor District Mohmand Agency. The appellant being bonafide resident of FR Kohat submitted application to the Director, E&SE Department, Khyber Pakhtunkhwa Peshawar on 17.09.2013 under Section 3 of the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 for her permanent transfer to home District. In response to the said application, the District Education Officer, Kohat was directed to adjust the appellant against the post of PST at FR Kohat. Vide order dated 05.05.2014, the appellant was adjusted against the post of PST at GGMS Feroz Mela, FR Kohat. The appellant assumed the charge on 27.05.2014 and started performing her duty. After serving for some time in the said school, respondent No. 3 relieved her and directed to report back to her previous assignment. The appellant went to GGPS Mari Kor District Mohmand for submitting arrival report which was refused by the Headmistress. Since then the appellant agitated her grievance before the concerned authorities but in vain. Lastly, she filed departmental appeal on 11.06.2018 before respondent No. 1 which elicited no response. Ultimately, the appellant approached this Tribunal through Service Appeal at hands. After admission of the appeal for regular hearing, the respondents were given notices. They after attending the proceedings have filed the written reply refuting the claim of the appellant.

3. We have heard the arguments and perused the record.

4. The appointment of the appellant in the respondent department in the year, 1993 and her continuous service thereafter has not been specifically denied in parawise comments filed on behalf of the respondents No. 1 & 2. Similarly account of her transfers given by the appellant that she was transferred to GFCS Spinki Tangi Mohmand Agency from GGPS Tarkho, Bajaur Agency followed by issuing of LPC is also not denied. The fact of rendering service by the appellant at Mohmand Agency is also not disputed. The dispute relates to the version of the appellant that she being bonafide resident of Kohat, submitted application for her transfer to her home Agency/District in the light of Section 3 of the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 and the respondent No. 1 directed the respondent No. 3 to adjust the appellant against the post of PST at FR Kohat. There is note of "no objection" recorded by A.E.O Mohmand Agency on application of the appellant as available on record. The copy of office order dated 05.05.2014 issued by Agency Education Officer, FR Kohat is also available on file as annexed with the Memorandum of Appeal. According to the order dated 05.05.2014, the appellant was adjusted in GGMS Feroz Mela FR Kohat on temporary basis with immediate effect till further order, in pursuance to direction of the Director of Education FATA Warsak Road, Peshawar. However, the respondent No. 1 and 2 in their Parawise comments did not admit the correctness of facts stated in Para-4 of the Memorandum of Appeal and denied the same. It was added on behalf of the said respondents that the duration, during which the appellant claims that she submitted application for her transfer, she was already removed from service and her salary was also stopped w.e.f. 01.07.2012. The copy of

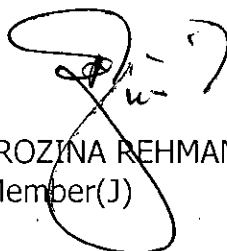


the order showing removal of the appellant from service has been annexed with the Parawise comments. The order dated 18.10.2013 as to removal of the appellant as referred before is in the style of Memorandum addressed to her by Agency Education Officer, Mohmand Agency at Ghalanai. It is stated in the said Memo. that consequent upon her absence from duty, she i.e. the appellant was asked to explain her absence but no reply was received in the office and again she was given show cause notice to show the reasons of absence but in vain. Therefore, she was informed that she by the said Memo. was removed from service with immediate effect. On the other hand, respondent No. 3 in his separate comments, submitted that the appellant was transferred to Mohmand Agency from Bajaur Agency and there at Mohmand Agency, she served till April, 2014. She was deputed from Mohmand Agency to F.R Kohat at the direction of Director of Education FATA on 24.04.2014 and the deputation order was issued for duty vide order dated 05.05.2014 at GGMS Feroz Mela, FR Kohat. It is also an admitted position on behalf of respondent No. 3 that she performed her duty in FR Kohat till October, 2014 and there-after she was relieved with direction to join her service in the previous station i.e. Mari Kor at Mohmand Agency. If version of the respondent No. 3 is kept in view, proceedings as to absence as reflected in the Memo. dated 18.10.2013 addressed to the appellant about her removal becomes questionable, when she was on duty till October, 2014 as per version of respondent No. 3. Obviously, the available parawise comments of respondents No. 1 and 2 with the copies of supporting record are short to provide the material for determination of the question of conflict between versions of respondents No. 1 & 2 and that of the respondent No. 3. There is yet another aspect of case in hand. The impugned order dated 18.10.2013 suggests that departmental proceedings



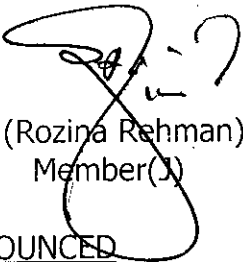

against the appellant were taken ex-parte due to her non-participation. The relevant Rule 9 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 provides that in case of non-availability/absence of a civil servant, he/she has to be served with notice through registered post at her residential address and, in case of failure of appearance, the notice is required to be published in two leading Newspapers. But no such notice was published before the impugned order. In the circumstances, the appellant remained at loss in defending her cause in accordance with law.

5. For what has been discussed above, the appeal in hand is allowed, the impugned order dated 18.10.2013 is set aside and the appellant is reinstated into service. The respondents shall be at liberty to hold regular/proper enquiry against the appellant and pass order afresh strictly in accordance with law. De-novo exercise shall be completed by the respondents within a period of ninety days from the receipt of copy of instant judgment, also allowing the appellant to participate therein and bring forth her defense. She shall be allowed to cross examine witnesses appearing against her, if any. The issue of back benefits in favour of the appellant shall be subject to the outcome of de-novo proceedings. Parties are, however, left to bear their respective costs. File be consigned to the record room.


(ROZINA REHMAN)
Member(J)

ANNOUNCED
22.09.2021


(AHMAD SULTAN TAREEN)
Chairman

S.No. of proceedings	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	22.09.2021	<p style="text-align: center;"><u>Present</u></p> <p>Mr. Noor Muhammad Khattak, Advocate ... For appellant</p> <p>Mr. Muhammad Adeel Butt, Addl. Advocate General, ... For respondents</p> <p>Vide our detailed judgment of today and placed on file, the appeal in hand is allowed, the impugned order dated 18.10.2013 is set aside and the appellant is reinstated into service. The respondents shall be at liberty to hold regular/proper enquiry against the appellant and pass order afresh strictly in accordance with law. De-novo exercise shall be completed by the respondents within a period of ninety days from the receipt of copy of instant judgment, also allowing the appellant to participate therein and bring forth her defense. She shall be allowed to cross examine witnesses appearing against her, if any. The issue of back benefits in favour of the appellant shall be subject to the outcome of de-novo proceedings. Parties are, however, left to bear their respective costs. File be consigned to the record room.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  (Rozina Rehman) Member(J) </div> <div style="text-align: center;">  Chairman </div> </div> <p><u>ANNOUNCED</u> 22.09.2021</p>

08.03.2021 Husband of appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Due to non-availability of D.B, case is adjourned to 07.06.2021 for the same as before.



Reader

07.06.2021

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

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. To come up for arguments on 13.09.2021 before D.B. Appellant be put on notice for the date fixed.



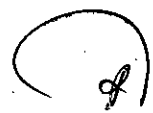
(ROZINA REHMAN)
MEMBER (J)

13.09.2021

Appellant present through counsel.

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

Arguments heard. To come up for order on 22.09.2021 before D.B.



(Rozina Rehman)
Member (J)



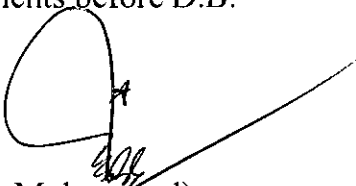
Chairman

13.10.2020

Counsel for the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for respondents are present.

Request was made on behalf of the learned Asst: AG as record is incomplete. He is seeking time to submit the same on the next date. Request is acceded to and the appeal is adjourned.

Adjourned to 23.12.2020 for such record and arguments before D.B.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member(J)

23.12.2020

Mr. Noor Muhammad Khattak, Advocate, for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General, for the respondents is also present.

Neither record was produced nor arguments were addressed, the learned Additional Advocate General for respondents submitted that since no representative of the respondents is present, therefore, time may be allowed to him to make contact with the quarter concerned for doing the needful, time was allowed and after resuming proceedings at 01:50 P.M, the requisite record could not be produced and time was again sought for its submission on the next date. Respondents were duty bound to have made compliance of the order of this Tribunal in its letter and spirit and must not have wasted time in its retrieval and consequent production before the bench however, they did not bother to pay proper heed to the direction so made, they are adamant to extend their assistance to the Tribunal in the timely disposal of appeal and therefore, have exposed themselves to appropriate legal action. Accordingly, notices of attachment of salaries followed by issuing of warrants of attachment of the salaries of respondents be issued to the offices concerned and directing the executing official to submit compliance report. The case is adjourned and in the meanwhile directing the respondents through the good offices of Additional Advocate General to produce the requisite record on or before 08.03.2021 positively. File to come up for arguments before D.B.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

11.03.2020

Junior counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith M/S Javed, Litigation Officer on behalf of respondents No. 1 & 2 and Abdul Qayum, ADEO on behalf of respondent No. 3 present. Representatives of the respondents submitted para-wise comments on behalf of respondents No. 1 to 3. The same are placed on record. To come up for rejoinder, if any, and arguments on 28.04.2020 before D.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

28.04.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 05.08.2020 before D.B.


Reader

05.08.2020

Due to summer vacation case to come up for the same on 13.10.2020 before D.B.


Reader

25.11.2019

Junior to counsel for the appellant and Addl.AG for the respondents present.

Learned AAG seeks time to contact the respondents and procure the requisite reply/comments. To come up for written reply/comments on 07.01.2020 before S.B.


Chairman

07.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Javed Litigation Assistant for the respondents present.

Representative of respondents seeks further time to furnish reply/comments. Adjourned to 17.02.2020 on which date the requisite reply/comments shall positively be furnished.


Chairman

17.02.2020

Junior counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Javed, Litigation Officer on behalf of respondents No. 1 & 2 present. Representative of respondents No. 1 & 2 seeks further time to furnish reply/comments. None present on behalf of respondent No. 3 therefore, notice be issued to him with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned to 11.03.2020 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

12.09.2019

Counsel for the appellant present.

Contends that the appellant, due to conduct of respondents, was constrained to submit service appeal No. 1172/2018 with the prayer for her adjustment and release of monthly salary. During the pendency of the appeal the appellant came to know that on 18.10.2013 an order of removal of appellant from service was passed by Agency Education Officer Mohmand at Ghalanai. The appeal was, therefore, withdrawn on 04.03.2019 and a departmental appeal was submitted on 25.03.2019 which remained un-responded. It was the argument of learned counsel that the impugned order dated 18,10,2013 was passed by an officer who was not competent for the purpose, therefore, the order was not valid under the law. Besides the appellant was never conveyed/served with the order till 04.03.2019. No departmental proceedings were undertaken by the respondents in accordance with the relevant rules before passing the impugned order.

Instant appeal is admitted for regular hearing subject to all just exceptions regarding delay in submission of departmental appeal. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 25.11.2019 before S.B.

Appellant Deposited
Security & Process Fee

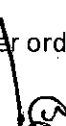


14/9/19


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 875/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/07/2019	<p>The appeal of Mst. Nabeela Afridi presented today by Mr. Noor Muhammad Khattak 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 3/7/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15/08/19</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>16.08.2019</p> <p>Since 15.08.2019 has been declared as public holiday on account of Eid-ul-Azha, therefore, case to come up for the same on 12.09.2019 before S.B.</p> <p style="text-align: right;"> Reader</p>

P-32
20/08/19

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 875 /2019

NABEELA AFRIDI

VS

EDUCATION DEPTT:

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5.	Applications	E	20- 23.
6.	Order & Charge report	F & G	24- 25.
7.	Arrival report	H	26.
8.	Departmental appeal	I	27.
9.	Service appeal	J	28- 32.
10.	Impugned order	K	33.
11.	Departmental appeal	L	34.
12.	Vakalat nama	35.

APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK,
ADVOCATE

Flat No. 3, Upper Floor,
Islamia Club Building,
Khyber Bazar, Peshawar
0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 875 /2019

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 918

Dated 03/7/2019

Mst; Nabeela Afridi, PST,
GGPS Mari Kor, Pandiali, District Mohmand.....**APPELLANT**

VERSUS

- 1- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Mohmand.
- 3- The District Education Officer, District Kohat.

.....**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
ORDER DATED 18/10/2013 COMMUNICATED TO THE
APPELLANT ON 04/03/2019 DURING PROCEEDINGS BEFORE
THIS AUGUST TRIBUNAL IN APPEAL NO. /2018
AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL
APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF
NINETY DAYS**

PRAYER:

That on acceptance of this appeal the impugned order dated 18.10.2013 communicated to the appellant on 04/03/2019 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That the appellant was initially inducted in the respondent Department as PST in the year 1993. That right from appointment the appellant served the respondent Department at far flung areas of FATA quite efficiently and up to the entire satisfaction of her superiors. Copy of the service book is attached as annexure **A.**
- 2- That during service the appellant was transferred and posted at GFCS Spinki Tangi, Mohmand Agency from GPS Tarkho, Bajaur Agency vide order dated 6/08/2007. That in pursuance of the above mentioned order the appellant submitted her charge report and started performing her duty at concerned station with zeal and zest. That it is pertinent to mention that the concerned authority also issued LPC to the appellant. Copies of the order and charge report are attached as annexure **B & C.**

Filed to-day
Registrar
3/7/19

- 3- That during service at Mohmand Agency the appellant was transferred from one station to another quite regularly and as such being obedient to high ups the appellant complied all the orders and had performed her duties quite efficiently and with devotion. Copies of the posting orders and charge reports are attached as annexure **D.**
- 4- That being the bonafide resident of FR Kohat the appellant submitted applications for her transfer to her home Agency/District in light of section-3 of the transfer/posting Regulatory Act, 2011. That in response the respondent No.1 directed the respondent No.3 to adjust the appellant against the post of PST at FR Kohat. Copies of the applications are attached as annexure **E.**
- 5- That vide order dated 5.5.2014 the appellant was adjusted against the post of PST at GGMS Feroz Mela FR Kohat. That in compliance the appellant submitted her charge report and started her duty at the station with devotion. Copies of the order and charge report are attached as annexure **F & G.**
- 6- That appellant after serving for some time at GGMS Feroz Mela, FR Kohat the respondent No.3 relieved the appellant and directed her to report back to her previous place of posting i.e. GGPS mari kor, accordingly the appellant submitted her arrival report at GGPS mari Kor, Mohmand Agency but the same was refused by the Head mistress as well as by the respondent No.2 without showing any reason and justification. Copy of the arrival report is attached as annexure **H.**
- 7- That since then the appellant is requesting the respondents for adjustment against the post of PST at GGPS Mari Kor, Mohmand Agency and this regard the appellant lastly submitted her Departmental appeal before the respondent No.1 but of no avail. Copy of the Departmental appeal is attached as annexure **I.**
- 8- That appellant feeling ^{aggrieved} filed service appeal No. 172/2018 before this august Tribunal and during proceedings in the above mentioned service appeal the respondent Department submitted the impugned order dated 18.10.2013 which was communicated to the appellant on 04.03.2019 whereby the appellant was removed from service. Copies of the memo of appeal and impugned order are attached as annexure..... **J & K.**
- 9- That appellant feeling aggrieved from the impugned order dated 18.10.2013 preferred Departmental appeal but no reply has been received so far hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure..... **L.**

GROUNDS:

- A- That the impugned order dated 18.10.2013 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan-1973.
- C- That the respondents acted in arbitrary and malafide manner while issuing the impugned order dated 18.10.2013.
- D- That the respondent Department transferred the appellant to FR Kohat where she was posted on temporary basis in GGPS Feroz Mela FR Kohat, but the respondent Department inspite of knowing the fact issued the impugned order dated 18.10.2013 on account of absentia.
- E- That no charge sheet and statement of allegation has been served on the appellant before issuance of the impugned order dated 18.10.2013.
- F- That no show cause notice has been served on the appellant before issuing the impugned order dated 18.2013.
- G- That chance of personal hearing/defense has been provided to the appellant which is mandatory under the law and rules.
- H- That no regular inquiry has been conducted in the matter of the appellant which is mandatory as per judgments of the Honorable Supreme Court of Pakistan before taking punitive actions against the civil servants.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 02.07.2019

APPELLANT

NABEELA AFRIDI

THROUGH:

NOOR MOHAMMAD KHATTAK
&

MIR ZAMAN SAFI
ADVOCATE

MISS. NABILA AFRIDI

(For use in Police Department only)

A-4

Heirs:—

- 1.
- 2.
- 3.

P.T.C Teachers Service Book

Verification Roll No. _____ dated _____ received back.

Left Thumb-Impression

Qualifications	Date	Qualifications	Date
① Passed SSL Examination			
B.S. Educ. Garden Sharif		First Arts	
English	1992 (A) marks obtained 57.5/100.	B.L. or B.A.	
Urdu	Agency Education Office Rajour Agency at Khas	Pleadership Examination	
Plan-Drawing		Training School Final Examination	
② Passed P.T.C Examination from AIOU		Other Qualifications:—	
Islam Abad under Roll No. E-6595241			
S.No. 78351, held in 1986, marks obtained 430/900, result declared on 31-12-1986.			
Drill Instructing			
Court Duties		Agency Education Office Rajour Agency	
③ Passed P.T.C Examination from AIOU			
Reserve Duties			
Islam Abad under Roll No. E-6595241			
S.No. 78351, held in 1986, marks obtained 530/900, result declared on 31-12-1986.			

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

Agency Education Office
Rajour Agency at Khas

ATTACHED

Note:— T

1. N

2. R

3. R

4. F

5. D

6. E

7. P

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I

9.

10.

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

5

1. Name: MISS. Nabeela Ajrudi

2. Race: Ashraf/Muslim

3. Residence: Village - Feroz Khan, PO Dara Adam Icheel.
DIST. Kohat (PR) Kohat.

4. Father's name and residence: Mr. Karim Khan Ajrudi

5. Date of birth by Christian era as nearly as can be ascertained: (24-08-1973) Twenty fourth August
N.H. and Seewy Three.


6. Exact height by measurement: 5-0

7. Personal marks for Identification: A mole on left arm.

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger 

Ring Finger 

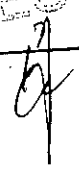
Middle Finger 


Fore Finger 

Thumb 

9. Signature of Government Servant: Nabeela Ajrudi

10. Signature and Designation of the Head of the Office, or other Attesting Officer: S. Raza 29/8/91
Agency Education Officer
Salwar Agency of E.H.

ATTESTED


ATTESTED


Date
on

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
<i>PR</i>		<i>BPS no 215 1025-60-1991</i>					
<i>BPS Phudrai 52</i>		<i>B 1097/2Ked</i>				<i>25¹⁰/₉₃</i>	<i>Nabeela Afridi</i>
<i>u</i>		<i>BPS 215 1480-87-2691</i>					
<i>u</i>		<i>B 1487/20</i>				<i>1⁰/₉₉</i>	
<i>u</i>		<i>B 1487</i>				<i>1¹²/₉₅</i>	

Signature of the officiating Government Servant

SV

Prin

Prin

Servant	10	11	12	13		14	15
				Nature and duration of leave taken	Leave		
					Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
				Period	Government to which debitabale	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
Bhichi	Signature of head of office or other attesting officer in columns 1 to 8 A. B. O. Rajaur Agency 31/94	Reason of termination (such as promotion, transfer, dismissal, etc.) Retired A. B. O. Rajaur Agency	Signature of the head of the office or other attesting Officer A. B. O. Rajaur Agency			Signature of the head of the office or other attesting officer Approved against ATR Post in BMS 7 & 10957/91 7/10/1992 Proc No 6,028-38 IR 20/10/1993	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
	Signature of head of office or other attesting officer in columns 1 to 8 A. B. O. Rajaur Agency 30/11/95	Reason of termination (such as promotion, transfer, dismissal, etc.) A. B. O. Rajaur Agency	Signature of the head of the office or other attesting Officer A. B. O. Rajaur Agency			Signature of the head of the office or other attesting officer 9/8/92 Agency Education Officer Rajaur Agency at Khar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
	Signature of head of office or other attesting officer in columns 1 to 8 A. B. O. Rajaur Agency 3/96	Reason of termination (such as promotion, transfer, dismissal, etc.) on leave A. B. O. Rajaur Agency	Signature of the head of the office or other attesting Officer A. B. O. Rajaur Agency			Signature of the head of the office or other attesting officer Service Verified w.e.f. 25/10/93 To 25/11/93 From Office record Agency Education Officer, Rajaur Agency at Khar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Signature of the head of the office or other attesting officer Service Verified w.e.f. 1-7-93 To 30/11/93 From Office record Agency Education Officer, Rajaur Agency at Khar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Signature of the head of the office or other attesting officer Service Verified w.e.f. 1-7-95 To 3/9/96 from Office record Agency Education Officer, Rajaur Agency at Khar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Signature of the head of the office or other attesting officer 2/leave w.e.f. 4/9/96 to 2-10/96 (34 days in July, 1996) and 2 days only Car with driver w.e.f. 8-10/96 to 20-11/96 (49 days) Some amount will ABOS of BMS no. 5873-8 obtain 1/12/96	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Signature of the head of the office or other attesting officer AGENCY EDUCATION OFFICER RAJOUR AGENCY AT KHAR	Reference to any recorded punishment or censure, or reward or praise of the Government Servant

ATTENDED

ATTENDED

1	2	3	4	5	6	7	8	9
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371-C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant	Signature of the officer requesting of attestation columns
PTC		B7 (2220-120-5820)				1		
SSPS Chingga	Temp	A. 2220/m. ind				26/2005		A. B. Bajaj
Revised B7 (2555-140-6755)		A. 25557-m. ind				12/05		A. B. Bajaj
		B. 25557-				12/2005		A. B. Bajaj
		A. 26957				12/2006		A. B. Bajaj
B-7 (2840-160-7740)		A. 3100/				12/2007		A. B. Bajaj
SSPS SPIMKI Fauda		B. 3100/A.				18/07		A. B. Bajaj
		B.						

دائرہ تعلیم و تربیت
DIRECTORATE OF EDUCATION (FATA) N.W.F.P PESHAWAR.

TRANSFER.

Mst: Nabila Afridi PTC Govt: Girls Primary School Tarkho (Bajour Agency) is hereby transferred to GPCS Spinki Tangi (Mohmand Agency) against a vacant post of PTC on her own pay & grade w/e the date of her taking over charge.

NOTES:-

1. Change reports should be submitted to all concerned.
2. No TA/DA etc: is allowed.

(FAZLI MANAN)
Director of Education
(FATA) N.W.F.P. Peshawar.

Endst: NO 17858-62 /WAS/Mohmand/Vol-II/Dated 6/08/2007

Copy forwarded for information to the:-

1. Agency Education Officer Bajour Agency at Khar.
2. Agency Education Officer, Mohmand Agency at Ghallanai w/r to his letter No: 8198 dated 2.8.07
3. Agency Accounts Officer (Bajour Agy:) at Khar.
4. Agency Accounts Officer (Mohmand Agy:) Ghallana
5. Teacher concerned.

[Signature]
Dy: Director of Education
(FATA) NWFP Peshawar.

[Signature]
36/8

ATTESTED

[Signature]

Inshad

For 11/08

ATTESTED

10) خارج رپورٹ

میں نے محکمہ ایجوکیشن اور سائنس کے سیکرٹری جنرل سے درخواست کی

کہ وہ ایف جی ایف اور ایف جی ایف کے تحت ایف جی ایف کے تحت

میں موجودہ طور پر 9/8/07 میں قبل از روٹیشن کے تحت خارج

سہ ماہی لیا

دستخط خارج دہندہ

دستخط خارج لکرنہ

نبیلہ آفریدی

Aleena Afriti

P.T.C

Handwritten signature

ATTENDED

Handwritten initials

ATTENDED

Handwritten signature

LAST PAY CERTIFICATE

11

1. Last Pay Certificate of Wahid Afridi PTC
 of the GCPS, Tanku Demand Bazar Agency.
 proceeding to Transfered.
 2. He has been paid upto 31/07/2007.

as the following rates:—
 Particulars:

Substantive Pay:—
 Officiating Pay:—
 Exchange Compensation Allowance:—

Pay.....Rs.	3100/-
HRA.....Rs.	882/-
SAA.....Rs.	370/-
MA.....Rs.	425/-
DA.....Rs.	75/-
SRA.....Rs.	595/-
15%.....Rs.	404/-
T.Allow.....Rs.	500/-
TOTAL:.....Rs.	6422/-

Verified
[Signature]
 Agency Accounts Officer

Deductions:—
 GPFund @Rs. 230/- PM vide A/C No. 101800/1A3/2452/CSS.
 GPFund @Rs. 25/- PM
 GPFund @Rs. 44/- PM
 EPFUND @ Rs. 04/- PM.

3. He made over charge of the Office of PTC Post:
GCPS, Tanku Demand Bazar Agency.
 on the 1st day noon of 3/8/2007 (AN).

4. Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

5. He has ben paid leave salary as detailed below. Deductions have been made as noted on the reverse.

From _____ to _____ at Rs. _____ a month
 From _____ to _____ at Rs. _____ a month
 From _____ to _____ at Rs. _____ a month

6. He is entitled to draw the following:—

7. He is also entitled to joining time for 13 per rule days.

8. The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

AT _____
[Signature]

AGENCY OFFICER
 BAZAR AGENCY KHAR

Signature: _____

REVERSE

Details of Recoveries

Name of recovery: _____

Amount Rs: _____

To be recovered in _____ instalments.

Deductions made from Leave Salary

From _____ to _____ on account of _____ Rs. _____

From _____ to _____ on account of _____ Rs. _____

From _____ to _____ on account of _____ Rs. _____

Name of months	Pay	Gratuity Fee, etc.	Fund and other deductions	Amount of Income-Tax recovered	Remarks
July, 19					
August, 19					
September, 19					
October, 19					
November, 19					
December, 19					
January, 19					
February, 19					
March, 19					
April, 19					
May, 19					
June, 19					

BETTER COPY PAGE-12

OFFICE OF THE AGENCY EDUCATION OFFICER, MOHMAND
AGENCY AT GHALLANAI

TRANSFER ORDER:

Miss Nabila Afridi PTC Female Community School Spinki Tangi Mohmand Agency is hereby transferred to Govt. Girls Primary School Shin sari Pandialai against the vacant PTC post with immediate effect in the interest of public service.

NOTE:-

- 1:- No TA/DA and Transferred grant is allowed.
- 2:- Charge report should be submitted to all concerned.

(HAJI HASHIM KHAN)
Agency Education Officer,
Mohmand Agency at Ghallanai

Indst. No. 12156-59/ dated 25/10/2007
Copy forwarded to all concerned.

Agency Education Officer,
Mohmand Agency at Ghallanai

ATTENDED

D-12

OFFICE OF THE DISTRICT INSPECTOR OF SCHOOLS
MADRAS STATE

The Madras State District Inspector of Schools
Pinki. Tangi Mohand Agency is hereby transferred to Govt. Girls
Primary School, Chinari, Chidambaram against vacant post with
immediate effect in the interest of public service.

NOTE:-

- 1:- No DA/DA and Transfer grant is allowed.
- 2:- Charge report should be submitted to the concerned authority.

(NAME OF THE OFFICER),
Agency Education Officer,
Mohand Agency at Chidambaram.

Order No. 12156-59 / dated 28/10/2007.

Copy to the:-

- 1:- A.I.C (Female) at this office.
- 2:- A.I.C, Mohand Agency at Chidambaram.
- 3:- Accountant/Clerk at this office.
- 4:- Teacher concerned.

Agency Education Officer,
Mohand Agency at Chidambaram.

مقامہ سیدہ آفریدی سجاد علی

(13)

از دفتر اے ای او سہیل احمد نے گورنمنٹ ٹرنڈ ٹیرا ٹرنڈ

سیدہ آفریدی کے لئے تحصیل سندھالی (13) از 15/07/2007

تو قسمل از دو کمر

از کوشکری گل کوراب

13-12
13
13/12/07
سے خارج حاصل کیا

خارج دیکھو

گل کوراب

سیدہ آفریدی
(P.T.C)

DR. A. S. Khan
F. C. M. A.
13/12/07

Handwritten signature

Handwritten signature

14



OFFICE OF THE AGENCY EDUCATION OFFICER,
MHMAND AGENCY AT GHALLANAI.
No. 5076 /Dated. 22/11/2011.

Subject:- Transfer/Posting

Memo:-
The following transfer/Posting of Female PTC teacher is hereby ordered to the school noted against her name on her own pay and scale in the interest of public service with effect from the date her taking over charge.

S.No.	Name and Designation	Present Posting	Transferred to	Remarks
01	Nabeela Afridi PTC	GGPS Shin Sari	GGPS Mari Kore	Vacant Post

- Note:-
- 01:- No TA/DA is allowe.
 - 02:- Charge Report should be submitted to all concerned.

[Signature]
Agency Education officer,
Mohmand Agency at Ghallanai.

Endst;No. _____ /Dated. _____ /2011.

- Copy to:-
- 01:-AAEO Concerned.
 - 02:-Pay clerk.
 - 03:-Teacher Concerned.

ATTESTED

[Signature]

Agency Education officer,
Mohmand Agency at Ghallanai.

ATTESTED

Allauz Rahman
For n/a pl

خارج الزور
24/11/11

(15)

میں نے حکم ایک کوشش آفیسر کے پاس، اوپر
ایکس (علی) آرڈینر
5076 صفحہ 22/11/11

حکومت Original پوسٹ P.T.C پر گورنمنٹ
پرائمری سکول GAPS خانہ 19 میں مورخہ 23/11/2011
قبل از دوپہر عہدے کا چارج سنبھال لیا۔

دستخط خارج ٹرین

پ.ت.سی

Aleeb Akhidi

P.T.C

دستخط چارج دھندہ

Allauz
23/11/11

ATTESTED

Handwritten signature

Rabina Tabasam
23/11/11

Teacher's Attendance Register

For the Month of MAY 2011

16

Name: <u>Ms. Sana</u>				<u>Ms. Sana</u>				<u>Ms. Sana</u>				<u>Ms. Sana</u>				
Designation: <u>P.T.</u>																
Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1	8:00	M-N	12:30	M-N	8:00	N-B	12:30	N-B	8:00	T-B	12:30	T-B	8:00	N-A	12:30	N-A
2	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
3	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
4	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
5	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
6	Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday	
7	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
8	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
9	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
10	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
11	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
12	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
13	Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday	
14	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
15	"	ON	July	"	"	"	"	"	"	T-B	"	T-B	"	N-A	"	N-A
16	"	"	"	"	"	"	"	"	"	T-B	"	T-B	"	N-A	"	N-A
17	"	"	"	"	"	"	"	"	"	T-B	"	T-B	"	N-A	"	N-A
18	"	"	"	"	"	"	"	"	"	T-B	"	T-B	"	N-A	"	N-A
19	"	"	"	"	"	"	"	"	"	T-B	"	T-B	"	N-A	"	N-A
20	Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday	
21	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
22	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
23	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
24	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
25	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
26	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
27	Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday	
28	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
29	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
30	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	N-A	"	N-A
31	"	"	"	"	"	"	"	"	"	"	"	"	"	"	"	"

STATEMENT OF LEAVES TAKEN

	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total
This Month																
Prv. Month																
Total																

KOH-I-NOOR PRINTING PRESS 14-UNION BAZAR LAHORE 54000

Signature M. Naz
Headmistress / Headmaster

G. C. P. S. Zahid Shah.

ATTACHED

A

A

Teacher's Attendance Register

For the Month of April 2011

(17)

Name: <u>M. Naz</u>		Designation: <u>P.T.C.</u>				Designation: <u>P.T.C.</u>				Designation: <u>P.T.C.</u>				Designation: <u>P.T.C.</u>			
Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	
1	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
2	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
3	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
4	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
5	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
6	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
7	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
8	7-30	M-N	7-30	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	on duty	"	"	
9	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	"	"	
10	Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		
11	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	"	"	
12	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	"	"	
13	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	"	"	
14	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	2.30	N.A	12.00	
15	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
16	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
17	Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday		
18	"	on duty	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
19	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
20	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
21	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
22	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
23	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
24	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	
25	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
26	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
27	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
28	"	"	"	"	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
29	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
30	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	"	N.A	"	
31																	

STATEMENT OF LEAVES TAKEN

	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total
This Month																
Prv. Month																
Total																

KOH-I-NOOR PRINTING PRESS 14-URDU BAZAR LAHORE 54000

Signature: M. Naz
Headmaster / Headmistress

Zahir Shah

AT

Teacher's Attendance Register

For the Month of 5/26/2011

18

Name: جی۔ بی۔ بی Designation: P.T.C P.T.C P.T.C P.T.C

Dates	P.T.C				P.T.C				P.T.C				P.T.C			
	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1																
2	T-B	M-N	T-B	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
3	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
4	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
5	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
6	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
7	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
8	Sunday				Sunday				Sunday				Sunday			
9	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
10	C-L	C-L	C-L	C-L	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
11	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
12	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
13	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
14	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
15	Sunday				Sunday				Sunday				Sunday			
16	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
17	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
18	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
19	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
20	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
21	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
22	Sunday				Sunday				Sunday				Sunday			
23	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
24	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
25	C-L	C-L	C-L	C-L	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
26	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
27	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
28	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
29	Sunday				Sunday				Sunday				Sunday			
30	"	M-N	"	M-N	"	N-B	"	N-B	"	T-B	"	T-B	"	N.A	"	N.A
31																

STATEMENT OF LEAVES TAKEN

	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total
This Month																
Prv. Month																
Total																

Signature M. Naz
Headmistress/Headmaster

ATTENDED

CP

H

سخدمت جناب اہل کوشش ڈائریکٹر، فائبر

(19)

عنوان نمبر ای۔ ڈی۔ ڈی، حاضری

جناب عالی :-

تذکرہ میں ہے کہ میں تبدیلہ آفیسری پی۔ ٹی۔ سی نے ڈی جی 2010 سے

بھارے سکول گورنمنٹ گورنر پورائٹری سکول ظاہر شاہ سرور قلعے میں
ڈیپٹی ایگزیکیوٹو پروجیکٹ سنبھالی۔ اور 2011 14 مئی تک

باقاعدہ ڈیپول سہرا انجام دی ہے اور ہمیں کوہ شغابہ کا موقع مل دیا
میں قلم حاضری دی ہے

تین ڈی ایس ہوئے

الذکر

تک قلم صہم خاں نعم 33۔ سرور قلعہ صہم خاں

ATTESTED

6/10/2011

ATTESTED

منور مینا - ڈائریکٹر آف محکمہ تعلیم خانہ KPK پشاور

جناب عالی :- درخواست عبادتبادلہ :-

گزارش گھنور اور سے کہ سائیکل نمبر 25¹⁰/₁₄₉₃ سے تاحال بحیثیت آ.سی. پی. گورنمنٹ کولجز میں منتقلی جاری ہے اور تحصیل منڈی مائی میں منتقلی سے روک دیا گیا ہے۔

سائیکل نمبر FR کو عسکری کے زینے والی ہے۔ سائیکل نے اپنی علاقے سے دور بہت سے مشکلات کا سامنا کیا۔ اور ہر دست بھجوا دی۔ اب چونکہ گھنور میں مشکلات بہت زیادہ ہو چکی ہیں۔ اور بچوں کی پرورش و بچہ تربیت دینے کے لئے اپنے گاؤں جانا ہنوردی ہو چکی ہے،

منڈی آ.سی. پی. میں عسکری کے سائیکل نے مشکلات کو مد نظر رکھ کر تحصیل منڈی مائی سے FR کو تبادلہ کا حکم ہمارے ذمہ ہے۔

العارض :- جناب عالی کا تابع فرماں نبیلہ آفریدی آ.سی. پی. گورنمنٹ کولجز میں منتقلی جاری ہے اور منڈی مائی تحصیل منڈی مائی

ATTESTED

[Handwritten signature]

NO objection on next transfer to FR school

[Handwritten signature]

17/9/13
A. E. O.
Mohmand Agency.

ATTESTED

[Handwritten signature]

حضرت صاحب دائرہ پبلشر اف تحلیف عالمی ماٹا - KPIC لیسٹا
صاف عالی (22)
درخواست بھرا دیا تبادا

گورنمنٹ گزٹ پبلشر اف سٹیٹسٹس
پیدا ہوا ہے کہ سٹیٹسٹس 25¹⁰ 1993 سے تاحال کتب PST
اور بیٹ سے مشکلات کا سامنا کیا۔ اور لہر داشت ہوئی ہے۔
موجودہ گورنمنٹ گزٹ پبلشر اف سٹیٹسٹس سے زیادہ موجودگی ہے۔ اور پبلشر اف
موجودہ گورنمنٹ گزٹ پبلشر اف سٹیٹسٹس سے زیادہ موجودگی ہے۔ اور پبلشر اف
موجودہ گورنمنٹ گزٹ پبلشر اف سٹیٹسٹس سے زیادہ موجودگی ہے۔ اور پبلشر اف

NABILA
PST SM

As I have already stated on here to Kohat
Previous application we don't have vacant post in FR Kohat
However she is deputy from Mohmand Agency
to FR Kohat, we will adjust her in FR Kohat
& when any vacant post arises she will be
adjusted accordingly.

ATTESTED

ATTESTED

Asst. Edu. Officer (M)
FR Kohat
18-4-2014

حضرت جناب ڈائریکٹر آف ٹیکنیکل ایڈمکسٹریشن - پاکستان ایسٹابلیشمنٹ
درخواست نمبر 111/2014

23

تذکرہ سائیکل 25¹⁰ 1993 سے تاحال مختص
گورنمنٹ گریڈ پرائمری سکول مارہ کو رکھنا
پتہ پال بھنگا ایجنسی سے ڈیوٹی انجام دے رہی ہے۔
سائیکل F.R کوٹہ کے رہنے والی ہے۔ سائیکل کے اپنے علاقہ کے
حوالہ سے مشکلات کا سامنا کیا۔ اور پتہ پال بھنگا سے
اب چونکہ گورنمنٹ کے مسائل بہت زیادہ ہو چکے ہیں۔ اور پتہ پال
پتہ پال اور اس کے تربیت دینے کے لئے اس کا واپس جانا
درخواست ہے۔ لہذا آپ صاحبان سرکاری کر کے سائیکل کے مسائل
مد نظر رکھ کر پتہ پال کو F.R کوٹہ کو تادیب
کے لئے درخواست ہے۔

ATTESTED

PST Nabilah
مختص

As I have already started on this vacant post in Kohat
previous applicant we don't have vacant post in Kohat
to FR Kohat, she is deputy teacher in FR Kohat
& when we will adjust her in FR Kohat
admitted according to post order she will be

18.4.2014

15/4/2014
Director Education
Peshawar

ATTESTED

F-24

OFFICE OF THE AGENCY EDUCATION OFFICER FR KOHAT AT KDA KOHAT.

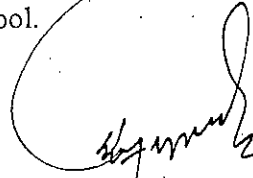
No. 833-35

Dated: 5/5/2014.

OFFICE ORDER.

As directed by the Director of Education FATA, Warsak Road Peshawar
Mst: Nabila Afridi PST at GGPS Mari Kor Tehsil Pandiali Mohamand Agency is here by adjusted
in GGMS Feroz Mela FR Kohat on temporary basis with immediate effect till further order.

NOTE: - She will draw her salary from here original school.


6/5/2014
Agency Education Officer
FR Kohat.

Endst No. _____/

Dated: ____/____/2014.

Copy to the:-

1. Director of Education FATA, warsak Road Peshawar.
2. Agency Education Officer Mohmand Agency.
3. Assistant Agency Education Officer (Fe-Male) FR Kohat.

Agency Education Officer
FR Kohat.

ATTESTED



ATTESTED

کتابت سے 20/1/2014ء

67

25

ماہانہ رپورٹ
 میں سید آفتاب احمد P.T.C. کے ذریعہ 833-35
 طالبان کمالیہ کراچی کے ذریعہ
 فeroze khel میں سید آفتاب احمد کے ذریعہ
 ماہانہ رپورٹ سنہ 2014ء

دستخط
 P.T.C. کے ذریعہ
 Date 25/1/2014

N. Kumar
 Head Mistress
 G.G.M School
 Feroze Khel Mela

Abul Kadir

ATTEST

Handwritten signature

Handwritten signature

کارخانہ

H-26

میں نیندہ انڈیا P.T.C. کے ساتھ ٹرانزیکشن کی سہولت
کارخانہ میں 26/5/2014ء کو

دو لاکھ روپے کی رقم کی سہولت

5

26/5/2014

دستخط

P.T.C. میں

Behula Shardi

P.T.C

Attested
by

ATTESTED

by

محترم جناب ڈائریکٹر ایجوکیشن، فائنا، فائنا سکریٹریٹ، لاہور

I-27 درخواست برائے منظوری خارج رپورٹ

جناب عالی

عرض ہے کہ میں بیہور پرائمری سکول پٹیگر گورنمنٹ
گورنمنٹ پرائمری سکول مہرگور، پنڈیالی ہمنڈ ایجنسی میں اپنی
خدمات سرانجام دے رہی تھی۔ اس دوران میں ہمنڈ ایجنسی
سے ایف آر کوٹاہٹ تبادلہ کیے درخواست جمع کی جو منظور
ہو کر مجھے گورنمنٹ گورنمنٹ پرائمری سکول فیروز مہلہ ایف آر
کوٹاہٹ عارضی طور پر ٹرانسفر کیا گیا۔ یہاں کوئی عالی
آسامی نہ ہونے کی بناء پر اس کے بعد دوبارہ گورنمنٹ
گورنمنٹ پرائمری سکول مہرگور ہمنڈ ایجنسی میں اپنا کام چاہا اور
جمع کیا لیکن وہ منظور نہیں کیا گیا اور تاحال میں دفتروں کے
دیکرناٹ رہی ہوں

اس لیے آپ صاحبان سے ملاقات کرنا چاہتا ہوں کہ متعلقہ ایجنسی
ایجوکیشن آفیسر کو حکم صادر فرمائے کہ سرانجام دیا جائے منظور
کرنے کے لیے ڈیوٹی کرنے کی اجازت دی جائے۔

Suba Akhtar

Attested

الموافق 11/06/2018

سیدہ آفریدی سے P.T.

گورنمنٹ گورنمنٹ پرائمری سکول مہرگور ہمنڈ ایجنسی

Attested

J-28

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 1172 /2018

Mst; Nabeela Afridi, PST,
GGPS Mari Kor, Pandiali, District Mohmand.....**APPELLANT**

VERSUS

- 1- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Mohmand.
- 3- The District Education Officer, District Kohat.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT ADJUSTING THE APPELLANT AGAINST THE POST PRIMARY SCHOOL TEACHER AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the respondents may very kindly be directed to adjusted the appellant against the post of Primary School Teacher (BPS-12) and release the monthly salaries of the appellant w.e. from October, 2011 till date. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

1- That the appellant was initially inducted in the respondent Department as PST in the year 1993. That right from appointment the appellant served the respondent Department at far flung areas of FATA quite efficiently and up to the entire satisfaction of her superiors. Copy of the service book is attached as annexure

A.

2- That during service the appellant was transferred and posted at GFCS Spinki Tangi, Mohmand Agency from GPS Tarkho, Bajaur Agency vide order dated 6/08/2007. That in pursuance of the above mentioned order the appellant submitted her charge report and started performing her duty at concerned station with zeal and zest. That it is pertinent to mention that the concerned authority also issued LPC to the appellant. Copies of the order and charge report are attached as annexure

B & C.

3- That during service at Mohmand Agency the appellant was transferred from one station to another quite regularly and as such being obedient to high ups the appellant complied all the orders and had performed her duties quite efficiently and with devotion. Copies of the posting orders and charge reports are attached as annexure **D.**

4- That being the bonafide resident of FR Kohat the appellant submitted applications for her transfer to her home Agency/District in light of section-3 of the transfer/posting Regulatory Act, 2011. That in response the respondent No.1 directed the respondent No.3 to adjust the appellant against the post of PST at FR Kohat. Copies of the applications are attached as annexure **E.**

5- That vide order dated 5.5.2014 the appellant was adjusted against the post of PST at GGMS Feroz Mela FR Kohat. That in compliance the appellant submitted her charge report and started her duty at the station with devotion. Copies of the order and charge report are attached as annexure **F & G.**

6- That appellant after serving for some time at GGMS Feroz Mela, FR Kohat the respondent No.3 relieved the appellant and directed her to report back to her previous place of posting i.e. GGPS mari kor, accordingly the appellant submitted her arrival report at GGPS mari Kor, Mohmand Agency but the same was refused by the Head mistress as well as by the respondent No.2 without showing any reason and justification. Copy of the arrival report is attached as annexure **H.**

7- That since then the appellant is requesting the respondents for adjustment against the post PST at GGPS Mari Kor, Mohmand Agency and this regard the appellant lastly submitted her Departmental appeal before the respondent No.1 but of no avail. Copy of the Departmental appeal is attached as annexure **I.**

8- That appellant feeling aggrieved and having no other remedy filed the instant service appeal before this august Tribunal on the following grounds amongst the others.

GROUND:

A- That the inaction of the respondents by not adjusting and accepting the arrival report of the appellant is against the law, facts and norms of natural justice.

B- That the appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan-1973.

ATTESTED

C- That the respondents acted in arbitrary and malafide manner by not adjusting and accepting the arrival report of the appellant as PST.

D- That respondents are duty bound to adjust and accept the arrival report of the appellant as Primary School Teacher at GGPS mari kor, Mohmand Agency.

E- That appellant has served the respondent Department for more than 20 years but inspite of that respondents are using tactics by not adjusting and accepting the arrival report of the appellant.

F- That the inaction of the respondents is violative of Article 27 of the Constitution of Pakistan 1973.

G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 18.09.2018

APPELLANT

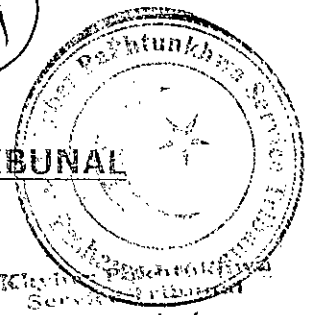
Nes
NABEELA AFRIDI

THROUGH:

N
**NOOR MOHAMMAD KHATTAK
ADVOCATE**

N
ATTORNEY

31



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. 1172 /2018

Diary No. 1461
Date 19-9-2018

Mst; Nabeela Afridi, PST,
GGPS Mari Kor, Pandiali, District Mohmand.....**APPELLANT**

VERSUS

- 1- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Mohmand.
- 3- The District Education Officer, District Kohat.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT ADJUSTING THE APPELLANT AGAINST THE POST PRIMARY SCHOOL TEACHER AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the respondents may very kindly be directed to adjusted the appellant against the post of Primary School Teacher (BPS-12) and release the monthly salaries of the appellant w.e. from October, 2011 till date. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

1-That the appellant was initially inducted in the respondent Department as PST in the year 1993. That right from appointment the appellant served the respondent Department at far flung areas of FATA quite efficiently and up to the entire satisfaction of her superiors. Copy of the service book is attached as annexure **A.**

2- That during service the appellant was transferred and posted at GFCS Spinki Tangi, Mohmand Agency from GPS Tarkho, Bajaur Agency vide order dated 6/08/2007. That in pursuance of the above mentioned order the appellant submitted her charge report and started performing her duty at concerned station with zeal and zest. That it is pertinent to mention that the concerned authority also issued LPC to the appellant. Copies of the order and charge report are attached as annexure **B & C.**

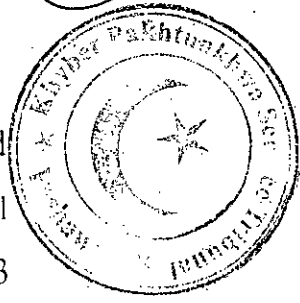
ATTESTED

[Signature]
Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Filed today
Registrar
19/9/18

Appel No. 1172/2018
MSA. Nabeela Afridi vs Govt

32




04.03.2019

Learned counsel for the appellant present and submitted application for withdrawal of the present service appeal with the permission to challenge the order dated 18.10.2013 of the removal of appellant from service, on the ground that from the perusal of reply of respondent No.2 and documents annexed therewith, it came to his knowledge that the appellant has been removed from service vide order dated 18.10.2013.

In view of above, the present service appeal is hereby dismissed as withdrawn and the appellant is at liberty to file fresh service appeal at his own cost and risk subject to all legal objections including the issue of limitation. No order as to costs. File be consigned to the record room.


Member

ANNOUNCED.
04.03.2019

Certified to be true copy

MEMBER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 02-07-19
Number of Words 800
Copying Fee 600
Urgent 2500
Total 800
Name of Applicant [Signature]
Date of Completion of Copy 02-07-19
Date of Delivery of Copy 02-07-19



AMMEN ✓ @

KI-33

**OFFICE OF THE AGENCY EDUCATION
AT GHALLANAI MOMAND AGENCY**

Phone.0924290180 Fax.0924290180

No. _____

Dated Ghallanai the. _____ / _____ /2013

To,

Mst; Nabila Afridi PST.
GGPS,Marai kor Tehsil Pandaily M/Agency.

Subject;- **REMOVAL FROM SERVICE.**

Memo,

Consquent upon your absence from duties you were asked vide this office No. 18486-92 dated, 20/09/2013, to explain about your absence, but no reply was received form this office, then you were asked vide this office No. 18570-75 dated, 02/10/2013, to show the reasons of absence and no response towards the explanations served upon you, but in vein.

Therefore, you are hereby removed from service in the best interest of public service with immediate effect.

Agency Education Officer,
Mohmand Agency at Ghallanai.

Endst; 18721-26 / Dated Ghallanai the, 18 / 10 /2013.

Copy for information to the,

1. Director of Education FATA,KPK,Peshawar.
2. Political Agent Mohmand Agency.
3. Asstt; Political Agent Upper/Lower Mohmand.
4. AAO,Mohmand Ghallanai.
5. AAEO,Concerned.

Agency Education Officer
Mohmand Agency at Ghallanai.

AO

To

The Director, (E&SE) Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 18.10.2013 COMMUNICATED TO THE APPELLANT DURING COURT PROCEEDINGS ON 04.03.2019 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE.

Respected Sir,

It is most humbly stated that I was initially appointed before your good self Department as PST in the year 1993. After appointment I was submitted my charge report and started performing duty quite efficiently and upto the entire satisfaction of my superiors. I have served the respondent Department for more than 20 years at far flung areas in FATA. During service I was submitted several applications for my transfer to my home station i.e. FR Kohat which was allowed and I was adjusted on temporary basis in GGMS Feroz Mela, FR Kohat vide order dated 05.05.2014 and in response to the said order I was submitted my arrival report and started performing my duty at the concerned station. After few days I was again relieved due to non availability of the vacant post from FR Kohat to Mohmand Agency and I was submitted my charge report in GGPS Mari Kor, Mohmand Agency but the same was refused. I was time and again visited the concerned quarter and requested for acceptance of my arrival at the concerned station but the concerned authority was not willing to accept my arrival report. Finally I was feeling aggrieved filed Departmental appeal before the Director Education FATA on 11.06.2018 followed by service appeal No.1172/2018 before the august Service Tribunal. During the pendency of the above mentioned service appeal the District Education Officer, District Mohmand submitted his reply alongwith other documents on 04.03.2019 from which It came into my knowledge that the concerned authority removed me from service on 18.10.2013. Respected Sir, I am feeling aggrieved from the impugned order dated 18.10.2013 communicated to me during proceedings before the august Service Tribunal on 04.03.2019 preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 18.10.2013 may very kindly be set aside and I may be re-instated into service with all back benefits.

Dated: 25.03.2019.

Your Obediently


NABEEL AFRIDI

PST

GGPS Mari Kor, District Mohmand

VAKALATNAMA

*Before the Khyber Pakhtunkhwa Service Tribunal
Peshawar*

No. _____/2019

Nabeela Afridi

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Department

(RESPONDENT)
(DEFENDANT)

I/We *Nabeela Afridi*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. *02 / 07* /2019



CLIENT,

ACCEPTED

NOOR MOHAMMAD KHATTAK

SHAHZULLAH KHAN YOUSAFZAI

**MIR ZAMAN SAFI
ADVOCATES**

OFFICE:

Room No. 1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391.

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: #875/2019.

NABEELA AFRIDI **Appellant**

VERSUS

The Director E&SE Department Khyber Pakhtunkhwa and Others
..... **Respondents**

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	PARAWISE COMMENTS AND AFFIDAVIT	1-3
2	Copy of the removal order	A	4
3	Copy of the charge reports/letters	B, C,D	5-7
5	Show cause notice	E	8

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No: 875/2019.

1

NABEELA AFRIDI **Appellant**

VERSUS

The Director E & SE Department Khyber Pakhtunkhwa and Others

..... **Respondents**

Para-wise comments on behalf of respondent No: 2 and 1

Respectfully Sheweth:

Preliminary Objection

1. That the appellant has got no cause of action to file the instant appeal
2. That the appellant has not come to this Honorable Tribunal with clean hands
3. That the appellant has concealed material facts from this Honorable Tribunal
4. That the instant appeal is badly time barred , hence liable to be dismissed
5. That the appellant is estopped by her own conduct to bring the instant appeal

On Facts:

1. Subject to record
2. Subject to record
3. Subject to record
4. Incorrect. Hence denied. The duration, during which the appellant claim that she submitted application for her transfer, she was already removed from service. **(Copy of the removal from service order is attached A)**
Similarly, the appellant salary was also stopped w.e.f 1/7/2012.
And even that the appellant did not inform the answering respondent about her transfer process nor she submitted any application in this regard to the District Education office Mohmand. Similarly, she didn't bother to respond the letter/notices issued by the respondent No 2. Which shows that how the appellant was interested in performing her duties?
5. Incorrect. The appellant didn't inform DEO Mohmand office about her transfer neither she got Last Pay Certificate (LPC) of her salary from DEO Mohmand office.

It is also noteworthy that the appellant attached a document on page (25) whereby as per her claim the appellant took charge as PTC teacher on dated 7/5/2014 in FR Kohat and then on 26/5/2014 the appellant admittedly submitted a charge report indicating that again she want to take charge in a school in District Mohmand without having/showing

any transfer order. Moreover, despite the above mentioned facts the appellant submitted an application on date. 11-6-2018, for accepting her Charge report. So, during these four years i.e. from 26/5/2014 to 11/6/2018, where did she actually performing her duty? (2)

(Copy of the letters are attached as annexure B, C & D and also available on Appellant File)

6. Incorrect. Hence denied. There is nothing on record that the appellant has provided any relieving chit/certificate issued by the Respondent No. 3.

Furthermore, there is nothing on record that the appellant submitted any application or inform the DEO Mohmand office about her retaking charge at GGPS Mari Kor Distt Mohmand.

7. Incorrect. The appellant submitted a departmental appeal in 11/06/2018 which was a time barred appeal.

Moreover, she was removed from service on 18/10/2013 after following all the codal formalities. Hence, she has no right to bring the instant appeal.

8. Correct to the extent that about 5 years later of appellant removal from service, the appellant filed an appeal No. 1172/2018 before the Hon'ble Service Tribunal for her adjustment on the post of PST and release of salary. It is noteworthy that during four/five years the appellant even didn't bother to perform her duty in any school either in District Mohmand or in FR Kohat, Which shows that how much the appellant was interested in performing her duty.

9. Incorrect. Hence denied. That the departmental appeal of the appellant is time barred as she filed it almost six years later of her removal from service. Hence, has no right to file the departmental appeal.

Grounds:

- A. Incorrect. Hence denied. The respondent being bound by law and competent authority acted in accordance with law and in accordance with the principles of natural justice.
- B. Incorrect. Hence denied. The respondent department treated the appellant in accordance with law and followed all the codal formalities; hence no provision of the constitution has been violated.
- C. Incorrect. As elucidated in the above para.
- D. Incorrect. Hence denied. As elucidated in para 6 and 7 on facts above.
- E. Incorrect. Hence denied. As per above paras.
- F. Incorrect. Hence denied. The respondent being bound law followed all the codal formalities and as such issued a show cause notice on dated 2/10/2013. **(Copy of the show cause notice is attached E)**
- G. Incorrect. Hence denied. As replied above.
- H. All codal formalities were completed.

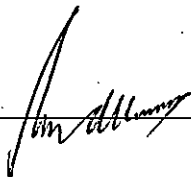
- I. That the respondents seek permission of this Hon'ble tribunal to present some other grounds at the time of hearing of the instant appeal.

3

Pray:

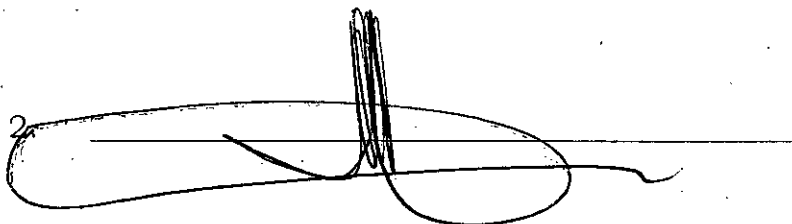
In view of the above factual and legal position, it is humbly prayed that the appeal in hand be dismissed with cost.

Respondent NO. 1.



Director Elementary and Secondary Education,
Khyber Pakhtunkhwa

Respondent NO. 2

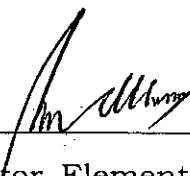


District Education Officer
Mohmand

AFFIDAVIT

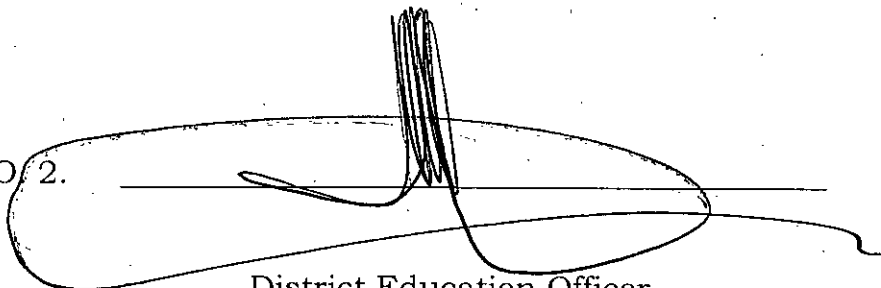
We the above respondents do hereby declare and affirm on oath that the above comments are true and correct to the best of our Knowledge and belief and that nothing has been concealed from this Honorable Tribunal.

Respondent NO. 1.



Director Elementary and Secondary Education,
Khyber Pakhtunkhwa

Respondent NO. 2.



District Education Officer
Mohmand



OFFICE OF THE AGENCY EDUCATION
AT GHALLANAI MOMAND AGENCY

Phone.0924290180 Fax.0924290180

No. _____

Dated Ghallanai the _____ / _____ /2013

To,

Mst; Nabila Afridi PST.
GGPS, Marai kor Tehsil Pandaily M/Agency.

Subject;- **REMOVAL FROM SERVICE.**

Memo,

Consquent upon your absence from duties you were asked vide this office No. 18486-92 dated, 20/09/2013, to explain about your absence, but no reply was received form this office, then you were asked vide this office No. 18570-75 dated, 02/10/2013, to show the reasons of absence and no response towards the explanations served upon you, but in vein.

Therefore, you are hereby removed from service in the best interest of public service with immediate effect.

Agency Education Officer,
Mohmand Agency at Ghallanai.

Endst; 18721-26 / Dated Ghallanai the, 18 / 10 /2013.

Copy for information to the,

1. Director of Education FATA,KPK,Peshawar.
2. Political Agent Mohmand Agency.
3. Asstt; Political Agent Upper/Lower Mohmand.
4. AAO,Mohmand Ghallanai.
5. AAEO,Concerned.

Agency Education Officer
Mohmand Agency at Ghallanai.

کتابت فی تاریخ ۱۴۳۵ھ

ماہنامہ تعلیم

833-35
P.T.C. (P.T. C. School)
P.T.C. (P.T. C. School)
P.T.C. (P.T. C. School)
P.T.C. (P.T. C. School)

دستخط
P.T.C. (P.T. C. School)
Date 7/5/2014

Signature
Head Mistress
G.G.M School
Feroze Khol Mela

Signature

ATTESTE

Signature

Amman



طابع التوثيق

A- (6)

(6)

من سید انور P.T.C. خود طبعاً تہذیبی اسکول
کاروانیہ میں 9 جولائی 2019/5/26 قبل 11

دو گزرائے پیر 666 ج سوال 5

دستخط "ج بزرگ"

پ.ت.سی

Behar Akhroti

P.T.C

Attested
by

محفوظ جناب ڈائریکٹر ایجوکیشن فائنا، فائنا سیکرٹریٹ لاہور

(7)

دعا ہے کہ منظری چارج رپورٹ

صاف عالی

D

عصر ہے کہ میں بطور سرانٹری سکول ٹیچر گورنمنٹ
گورنمنٹ سرانٹری سکول مری ٹور، میڈیکل ایمریٹی ایجوکیشن میں اپنی
خدمات سرانٹری سے ایف آ آر کوہٹ تبادلہ کی درخواست جمع کی جو منظور
کیا گیا ہے۔ اس دوران میں ایمریٹی ایجوکیشن
گورنمنٹ گورنمنٹ گورنمنٹ سرانٹری سکول فیروز مہلہ ایف آ آر
کے عارضی طور پر ٹرانسفر کیا گیا۔ لیکن وہاں کوئی عالی
آسامی نہ ہونے کی بناء پر اس کے تبادلے میں دوبارہ گورنمنٹ
گورنمنٹ سرانٹری سکول مری ٹور، ایمریٹی ایجوکیشن میں اپنا چارج رپورٹ
جمع کیا گیا۔ وہ منظور نہیں کیا گیا اور تاحال میں دفتروں کے
دفتروں کے

اس لئے ایجنٹوں سے ملاقات کی گئی ہے کہ متعلقہ ایجنسی
ایجوکیشن آفیسر کو حکم صادر فرمائے کہ میرا چارج رپورٹ منظور
کرنے کے لئے ڈیوٹی کرنے کی اجازت دی جائے

Abdul Wahid

Attested

الموافق 11/06/2018

سیدہ آفریدی P.T.C
گورنمنٹ گورنمنٹ سرانٹری سکول مری ٹور، ایمریٹی ایجوکیشن



OFFICE OF THE AGENCY EDUCATION
AT GHALLANAI MOMAND AGENCY

Phone.0924290180 Fax.0924290180

No. _____

Dated Ghallanai the _____ / _____ /2013

~~8~~

8

To,

Annen

E

Mst; Nabila Afridi PST,
GGPS, Marai kor Tehsil Pandialy.

Subject;- Show cause Notice.

Memo,

Consquent upon your absence from duty in the School you have asked vide this office No, 18486-92 dated 20/09/2013, to explain about your absence , but till now no reply has been received in this office from your-side.

You are asked to show the reason for your absence , and no response to the explanations served upon you within seven days after the issuing date of this letter, otherwise you will be considered as removed from service in the interest of public service.

Agency Education Officer,
Mohmand Agency at Ghallanai.

Endst; 18570-75/ Dated Ghallanai the 02 / 10 /2013.

Copy for information to the,

1. Director of Education FATA,KPK,Peshawar.
2. Political Agent Mohmand Agency.
3. Asstt; Political Agent (Lower) Mohmand.
4. AAO,Mohmand Ghallanai.
5. AAEO,Concerned.

Agency Education Officer,
Mohmand Agency at Ghallanai.

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No. 875 /2019

Mst; Nabeela Afridi, PST,

GGPS Mari Kor, Pandiali, District Mohmand **APPELLANT**

Versus

1. The Director E & SE KPK, Peshawar.
2. District Education Officer, Distract Mohmand.
3. The District Education Officer, District Kohat **RESPONDENT**

PARA WISE REPLY ON THE BEHALF OF RESPONDENTS NO. 3

PRELIMINARY OBJECTIONS

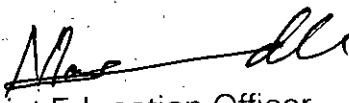
1. The Appeal is bad for non-joinder and mis-joinder and unnecessary Parties.
2. The appellant has got no locus standai to file the instant appeal.
3. That the appellant has not come to this august tribunal with clear hand.
4. That appeal is badly time bared.
5. The instant appeal is not maintainable in the present form.

FACT:

1. The Appellant belong to FR Kohat. But her father was a government servant at Bajaur Agency. So she was Appointed against PST post at Bajaur Agency.
2. The Appellant was transferred to Mohmand Agency from Bajaur Agency. There at Mohmand Agency she served up till April 2014.
3. The Appellant was deputed from Mohmand Agency to FR Kohat at the direction of Director Education FATA, on dated 24/04/2014 and the deputed order Issued vide AEO FR Kohat Letter No 833-35 dated 05/05/2014 at GGMS Faroz Mela FR Kohat. **Attached as Annexure A & B**
4. The Appellant performed her Duty in FR Kohat as a depute person up till October 2014.

5. After that the above cited period the Appellant was relived with the direction to join her service in the previous station/posting i.e Mari Kor at Mohmand Agency.
6. There after the respondent No 3 has no information about the service /duty of the Appellant.

Respondent No 3


District Education Officer
TSD Darra Kohat

حضرت صاحب ڈائریکٹر آف محکمہ تعلیم ناٹا - PK-1 لیٹا سون
درخواست نمبر 114

23

تذکرہ سائنس 1993 سے 25¹⁰ تا حال تک
گورنمنٹ گریڈ پرائمری سکول ماری کورجھل
پتہ ناٹا لیٹا سون سے
سائنس F.R کوٹا کے رہنے والے ہیں۔ سائنس کے اپنے علاقے سے
جو رہتے ہیں وہاں سے مشکلات کا سامنا کیا۔ اور پورا وقت گھر سے
ان کو دیکھنا پڑا۔ بہت زیادہ سوچا گیا۔ اور پھر
مد نظر آفیسر کے پاس آ کر درخواست کی۔ اور پھر
حکم صادر ہوا۔ لیڈ آف صاحبان ماری کورجھل
گورنمنٹ پرائمری سکول ماری کورجھل ناٹا - PK-1

ATTESTED

PST Nabilga
گورنمنٹ پرائمری سکول ماری کورجھل ناٹا - PK-1

Amranchi Juncin Educator

As I have already stated on my previous application we don't have any vacant post in the school. She is deputy teacher and we will adjust her in FR Kohat when any vacant post arises. She will be adjusted accordingly.

Signature

18.4.2014

Director Education
F.C. Kohat

15/4/2014
ARCO Peshawar
consider the for administrative
in Peshawar on priority basis

Signature
Director Education
Secretary, Peshawar

B

F-24

OFFICE OF THE AGENCY EDUCATION OFFICER FR KOHAT AT KDA KOHAT.

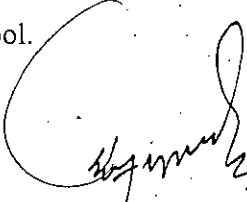
No. 833-35

Dated: 5/5/2014.

OFFICE ORDER.

As directed by the Director of Education FATA, Warsak Road Peshawar
Mst: Nabila Afridi PST at GGPS Mari Kor Tehsil Pandiali Mohamand Agency is here by adjusted
in GGMS Feroz Mela FR Kohat on temporary basis with immediate effect till further order.

NOTE: - She will draw her salary from here original school.


Agency Education Officer
FR Kohat.

Endst No. _____ /

Dated: ___ / ___ / 2014.

Copy to the:-

1. Director of Education FATA, warsak Road Peshawar.
2. Agency Education Officer Mohmand Agency.
3. Assistant Agency Education Officer (Fe-Male) FR Kohat.

Agency Education Officer
FR Kohat.

ATTESTED



