

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. 2083/2019

Date of Institution ... 16.12.2019

Date of Decision ... 01.06.2021

Syed Aziz Ahmed Shah S/o Syed Ahmed Hussain
R/o Mohallah Bakhshali, Tehsil & District Mardan.

... (Appellant)

VERSUS

District Education Officer (DEO Male) District Mardan and three
other respondents.

... (Respondents)

Mr. AMIN ULLAH JAN,
Advocate

--- For appellant.

MR. RIAZ AHMAD PAINDAKHEIL,
Assistant Advocate General

--- For respondents.

MR. SALAH-UD-DIN ---
MR. ATIQ-UR-REHMAN WAZIR ---

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)


JUDGEMENT:

SALAH-UD-DIN, MEMBER:- The appellant has filed the instant service appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, challenging the impugned office order bearing No. 10893 dated 25.09.2019, whereby the departmental representation of the appellant against the order regarding recommendation of conversion of his detention period with effect from 10.03.2017 to 31.08.2018 as leave, was rejected.

2. The brief facts as alleged by the appellant in his appeal are that he was serving as Teacher in Government High School Gujrat District Mardan, when he was picked up by unknown persons, probably officials of Security Agencies on 09.03.2017, on the basis of suspicion; that the

matter was reported to Local Police Station, which was entered vide Daily Diary No. 19 dated 10.03.2017; that the appellant was released on 31.08.2018, who approached the appointing Authority on 01.09.2018 and submitted an application narrating therein the whole episode regarding his arrest by the Security Agencies; that the appellant was found innocent during the inquiry conducted into the matter, therefore, he resumed the duty on 01.09.2018, however upon the order of competent Authority, pay and allowances for the period w.e.f 10.03.2017 till 31.08.2018 have not been paid to the appellant.

3. The respondents submitted comments wherein it was mainly alleged that the appellant was adjusted on humanitarian grounds with effect from 01.09.2018 and his detention period with effect from 10.03.2017 to 31.08.2018 has rightly been converted into leave; that the appellant has not performed any duty with effect from 10.03.2017 to 31.08.2018, therefore, he cannot claim any salary for the said period.

 4. Mr. Amin Ullah Jan, Advocate, representing the appellant has contended that the appellant was taken into custody by Security Agencies on the basis of suspicion on 09.03.2017 and report regarding the same was registered in the concerned Police Station on 10.03.2017; that the appellant was not found involved in an illegal activities, therefore, he was released on 31.08.2018 and on the very next day, he submitted arrival report to the competent Authority through an application, narrating therein the whole episode; that the inquiry officer has given categorical findings in his report that the appellant is a dedicated and punctual Teacher and that his absence is not willful; that the absence of the appellant from duty with effect from 10.03.2017 to 31.08.2018 was not due to any fault of the appellant, therefore, he is legally entitled for salary and allowances of the said period.

5. On the other hand, Mr. Riaz Ahmad Paindakheil, Assistant Advocate General has contended that it has not been proved that the appellant was in custody of Law Enforcement Agencies; that it was on compassionate grounds that the appellant was allowed to resume his duty and as he has remained absent with effect from 10.03.2017 to 31.08.2018, therefore, the competent Authority has rightly held that the appellant is not entitled to any salary for the said period; that the

appellant has not produced any clearance certificate issued by the concerned quarter, therefore, his departmental appeal was rightly dismissed.

6. We have heard the arguments of learned counsel for the appellant as well as learned Assistant Advocate General for the respondents and have perused the record.

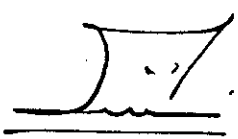
7. A perusal of the record would show that the appellant has alleged that he was taken into custody by some unknown person, probably officials of Security Agencies, who kept the appellant in custody for 17 months and 22 days. The appellant was allegedly taken into custody on 09.03.2017 and his brother namely Syed Shakeel Ahmed Shah reported the matter to the local police, which was recorded vide Daily Diary No. 19 dated 10.03.2017 Police Station Chooria District Mardan. Copy of the Daily Diary report is available on the record, which is supporting the stance of the appellant regarding his taking into custody by some unknown people. Upon the order of District Education Officer (Male) Mardan, Hafiz Zubair Ahmed Principal GCMHS No. 3 Mardan was appointed as inquiry officer for conducting of inquiry into the matter. The inquiry officer has submitted inquiry report, copy of which is available on record. The inquiry officer has concluded that the nature of absence of the appellant cannot be considered as *willful* as he was in the custody of Law Enforcement Agencies. The inquiry officer has recommended that the pay of the appellant may be released as per Financial Rules and procedure accordingly, after fulfilling of the required codal formalities. The inquiry officer has not made any recommendation that the detention period of the appellant with effect from 10.03.2017 to 31.08.2018 may be converted into leave, however upon the receipt of inquiry report office order bearing Endorsement No. 7907-09/V:I/E:file/Aziz Ahmed Shah/SCT dated 17.10.2018 was issued by District Education Officer (Male) Mardan with a note that the detention period of the appellant with effect from 10.03.2017 to 31.08.2018 for conversion into leave may be sent for further process of the case. The departmental appeal of the appellant against the recommendation regarding the considering of the period of his detention with effect from 10.03.2017 to 31.08.2018 as leave was also rejected with the remarks that no clearance certificate has been provided by the appellant. In view

of the inquiry report, it is clear that the absence of the appellant from 10.03.2017 to 31.08.2018 cannot be considered as willful absence because appellant was in custody of Law Enforcement Agencies. Keeping in view the facts and circumstances of the case, it was beyond control of the appellant to attend his duty for the period from 10.03.2017 to 31.08.2018, therefore, the respondents have wrongly and illegally considered the period of absence of the appellant as leave.

8. In light of the above discussion, the appeal in hand is accepted by setting-aside the impugned order and it is directed that the appellant shall be considered to have remained on duty for the period from 10.03.2017 to 31.08.2018 and he shall be paid the pay as well as allowances for the said period in accordance with the relevant law/rules. Parties are left to bear their own costs. File be consigned to the record room.


(**ATIQ-UR-REHMAN WAZIR**)
MEMBER (EXECUTIVE)


ANNOUNCED
01.06.2021

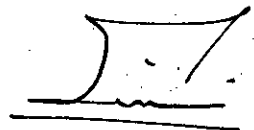

(**SALAH-UD-DIN**)
MEMBER (JUDICIAL)

ORDER
01.06.2021

Appellant alongwith his counsel Mr. Amin Ulla Jan, Advocate, present. Mr. Riaz Ahmad Paindakheil, Assistant Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand is accepted by setting-aside the impugned order and it is directed that the appellant shall be considered to have remained on duty for the period from 10.03.2017 to 31.08.2018 and he shall be paid the pay as well as allowances for the said period in accordance with the relevant law/rules. Parties are left to bear their own costs. File be consigned to the record room.


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


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

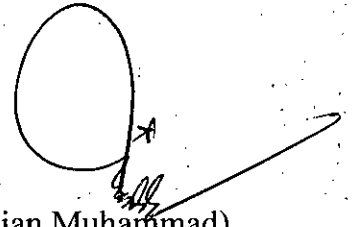
ANNOUNCED
01.06.2021

30.12.2020

None for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Sajid Khan, ADEO for respondents present.

Written reply on behalf of respondents No.1 to 3 submitted. Written reply on behalf of respondent No.4 not submitted. Notice be issued to respondent No.4 for submission of written reply/comments.

Adjourned to 24.02.2021 before S.B.

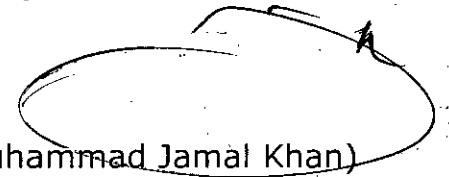


(Mian Muhammad)
Member(E)

24.02.2021

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

Written reply on behalf of respondents No. 1 to 3 has already been submitted while neither written reply on behalf of respondent No. 4 is submitted nor anyone else representing him is present despite issuance of notice vide preceding order sheet dated 30.12.2020, therefore, he is proceeded against ex-party. File to come up for rejoinder and arguments on 01.06.2021 before D.B.



(Muhammad Jamal Khan)
Member

21.07.2020

Appellant himself is present. Mr. Kabirullah Khattak, Additional AG alongwith representative of the department Mr. Sajid, Superintendent are also present.

Representative of the department seeks further time to submit the requisite reply/comments. May do so on next date of hearing. Adjourned to 16.09.2020 for submission of written reply/comments before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER

16.09.2020

Counsel for the appellant and Addl. AG alongwith Sajid ADEO for the respondents present.

Representative of the respondents requests for time to furnish the reply/comments. Adjourned to 05.11.2020 on which date reply/comments shall be submitted without fail.


Chairman

05.11.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional AG for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Additional AG requests for further time to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 30.12.2020 on which date written reply/comments shall be positively submitted before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER

31.01.2020

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (S.T.T) has filed the present service appeal for the release of pay and allowances/salaries of 17 months & 22 days.

Submissions made by the learned counsel for the appellant need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 20.03.2020 before S.B.


Member

20.03.2020

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Written reply on behalf of respondents not submitted. Learned Additional AG seeks time to obtain written reply/comments from respondents. Adjourned to 29.04.2020 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

29.04.2020

Due to COVID19, the case is adjourned to 21.07.2020 for the same as before.

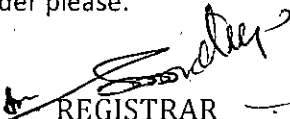
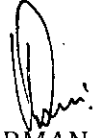

Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2083/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/12/2019	<p>The appeal of Syed Aziz Ahmad Shah resubmitted today by Mr. Aminullah Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>31/01/20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Syed Aziz Ahmad Shah son of Syed Ahmad Hussain r/o Mohallah Bakhshali Tehsil and District Mardan received today i.e. on 16.12.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- 2- Annexures of the appeal may be flagged.

No. 2216 /S.T,

Dt. 17-12 /2019.


REGISTRAR -
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amin Ullah Jan Adv. Pesh.

5/16

Re-submitted appeal removal
of official objection, fl 3.

1. Better copy of Annex 4 (new typed)
2. Annexes re-flagged.



Mr. Ismael
Adv

0312-9900704

Appeal No. 2023 / 2019

Syed Aziz Ahmed Shah S/O Syed Ahmed Hussain, R/O Mohallah Bakhshali, Tehsil and District Mardan

.....Appellant.

VERSUS

1. District Education Officer (DEO Male) District Mardan.
2. Director education, Directorate of Elementary & Secondary Education K.P.K, Peshawar.
3. Secretary Elementary & Secondary Education K.P.K, Peshawar.
4. Principal Government High School Gujrat, District Mardan.

.....Respondents

INDEX SHEET

S/No	Description Of Documents	Annexure	Page No
1	Memo of Appeal		1-4
2	Copy of Appointment Order	A	5-6
3	Copy of Mad Report dated 10/3/2017	B	7
4	Copy of application dated 01-09-2018 along with school principal letter No. 248 dated 4/9/2018 of GHHS Mardan, & Inquiry Report dated 1/10/2018	C, D, E	8-13
5	Copies of office order no. 7907-09 dated 17/10/2018 and Charge resumption letter No. 1093 dated 5/10/2018	F & G	14-15
6	Copy of Departmental appeal of the appellant dated 20-10-2018 and school principal letter No 230 dated 31-10-2018 And impugned order no. 10893 of DEO Mardan dated 25/09/2019	H, I, J	16-18
7	Copy of Police Station Clearance Report dated 19/2/2019	K	19
8.	Wakalat Nama		

APPELLANT


Syed Aziz Ahmed Shah

Through


Amin Ullah Jan
Advocate High Court

BEFORE THE K.P.K SERVICES TRIBUNAL PESHAWAR.

Appeal No. 2083 / 2019

Syed Aziz Ahmed Shah S/O Syed Ahmed Hussain, R/O Mohallah Bakhshali, Tehsil & District Mardan.

Khyber Pakhtunkhwa
Service Tribunal

.....Appellant

VERSUS

Diary No. 1887

Dated 16/12/2019

1. District Education Officer (DEO Male) District Mardan.
2. Director Education, Directorate of Elementary & Secondary Education K.P.K, Peshawar.
3. Secretary Elementary & Secondary Education K.P.K, Peshawar.
4. Principal Government High School Gujrat, District Mardan.

.....Respondents

APPEAL U/S 4 OF THE KPK SERVICES TRIBUNAL ACT 1974, AGAINST THE IMPUGNED OFFICE ORDER NO. 10893 DATED 25/09/2019 OF DEO MARDAN, WHEREBY THE RESPONDENT NO 1 HAS REJECTED THE APPLICATION OF THE APPELLANT ON REMARKS THAT "NO CLEARANCE CERTIFICATE HAS BEEN PROVIDED" BUT IN FACT THE APPELLANT SUBMITTED THE CLEARANCE DOCUMENTS OF CONCERN POLICE STATION, FOR FURTHER PROCEEDING BEFORE THE IMPUGNED ORDER DATED 25-09-2019, BUT IN VAIN, HENCE THIS APPEAL.

PRAYER

On acceptance of the instant appeal, the Impugned office order No. 10893 dated 25/09/2019 of the Respondent No.1 DEO Mardan, may kindly be set aside, and the Respondents may kindly be directed to release all the Arrears of Pay and Allowances / salaries which is outstanding almost 17 Months and 22 days may pleased kindly be handed over to appellant, And any other relief and remedy deems justified by this Hon'ble Tribunal may also be passed in favour of the appellant.

Respectfully Sheweth.

The appellant humbly submits as under: -

That the appellant is a law abiding citizen of the Pakistan.

That the appellant was appointed as a Senior Theology Teacher (STT) in GHS Gujrat, District Mardan vide KPK Education Department Order No. 1532/G dated 22/02/2007 on regular basis.

(Copy of Appointment Order is attached as Annexure A).

Registered and filed.

Medico-day
Registrar
16/12/19
Registrar
16/12/19

3. That the appellant has performed his duty upto the entire satisfaction of Public and his department professional sincerity and sobriety.
4. That on **09/03/2017**, the appellant was picked up / arrested by Unknown person while going with brother from Bakhshali to Mardan on Motorcycle and was taken by them to unknown location for investigation on mere suspicious grounds. The report about picking up / abduction of the appellant was also reported to Police Station by his real brother of the appellant on dated **10/03/2017** and Mad Report to this effect was also chalked out by Police Station Choor District Mardan.

(Copy of Mad Report dated 10/3/2017 is attached as Annexure B).
5. That the appellant was detained for 17 Months and 22 days by this unknown person (probably the state Law Enforcement Agencies/ Security Agencies) and the appellant was kept / detained at different locations/places and was investigated at length and thoroughly, the appellant also feels wretchedness to have no any contact with his family during detention period.
6. That during the time of appellant detention with the unknown person/ institution, the family of the appellant not only faced the agony of losing appellant on one hand and on the other hand, the salary / monthly pay of the appellant was stopped by the Education Department DEO Male Mardan nor a single penny of stipend / sustenance allowance has been paid to the family of the appellant during detention period as the appellant was the only source of income of his family.
7. That the appellant was released from detention on **31/08/2018** and thereafter on the very next day i.e **01/09/2018**, the appellant reported to his concerned authority and presented his narration of the entire facts in shape of application. That upon the said request/application of appellant, a proper inquiry was conducted, which declared the appellant as innocent and recommended for re-instatement in service after going through all the material facts and circumstances culminated on the release of appellant from theses unknown person/ institution and thereafter submission of application for re-joining on service.

(Copy of application dated 01-09-2018 along with school principal letter No. 248 dated 4/9/2018 of GHHS Mardan, & Inquiry Report dated 1/10/2018 are attached as Annexure C, D, & E)

8. That upon the inquiry report the appellant was re-instated on his service / adjusted against his original STT post in the same school with effect from **01/09/2018** in the interest of public service and thereupon the appellant join his service and resume his duty on **01/09/2018**.

(Copies of office order no. 7907-09 dated 17/10/2018 AND Charge resumption letter No. 1093 dated 5/10/2018 are attached as Annexure F & G).

9. That the appellant requested to his high ups for release of his outstanding salary/ pay and allowances, however the same has been rejected/ turned down by the DEO Mardan with the direction that **"No Clearance certificate has been provided"**. Which is illegal, void against the law and facts, and ineffective upon the rights of the appellant.

(Copy of Departmental appeal of the appellant dated 20-10-2018 and school principal letter No 230 dated 31-10-2018 And impugned order no. 10893 of DEO Mardan dated 25/09/2019 are attached as Annexure H, I & J,)

10. That the appellant has submitted the clearance documents from the concern police station as per the requirements of the Respondents, but the Respondents has not given any preference to the said clearance of the Appellant.

(Copy of Police Station Clearance Report dated 19/2/2019 is attached as Annexure K)

11. That being aggrieved from the said impugned office order of the respondent No 1, the appellant approaches to this Hon'ble Forum / Tribunal for setting aside the above mentioned impugned office order on the following grounds amongst others: -

G R O U N D S.

- A. That the impugned order of the respondents is against law, facts, and violation of the procedure.
- B. That absence of the appellant from duty was neither habitual nor willful but due to the above mentioned compelling circumstances.
- C. That inquiry Report has also recommended for release of pay of the appellant vide para 2 of the Recommendation of inquiry Report conducted upon the instruction of Competent Authority i.e. DEO (Male) Mardan.
- D. That the order of the respondent is without any legal justification and against due course of law which is ineffective, unlawful, illegal and void upon the rights of the appellant and is liable to be set aside on this score alone.

- E. That the order of the respondent by declining to pay the outstanding salary of 17 Months & 22 days to the appellant without assigning any proper, valid and justified reason is highly unjust and prejudicial to the rights of the appellant.
- F. That the appellant is a poor citizen of the state having no any other source of income and family of the appellant has taken/ obtained loan from different relative for their feeding/ sustenance and also faced extreme starvation during detention period of the appellant.
- G. That precedents of the superior courts favour the stance of the appellant beside humanitarian consideration.
- H. That the appellant totally stand condemned unheard, and the appellant could not be deprived of his due rights without any due process of law, such orders being void ab-initio could not be allowed to remain in field.
- I. That liberty of the appellant was jeopardized during the time of detention period which could not be measured in any manner/ terms as the appellant was also physically incapable to join his duty during the entire detention period, furthermore the appellant was not in position to breath in free environment under the open sky during entire detention period.
- J. That on permission of this Hon'ble Tribunal, the Appellant reserves the right to urge other grounds at the time of arguments.

PRAYER

It is therefore humbly prayed that on acceptance of the instant appeal, the Impugned Office Order No. 10893 dated 25/09/2019 of Respondent No.1 DEO (Male) Mardan, may kindly be set aside, and the Respondents may kindly be directed to release all the Arrears of Pay and Allowances/salaries which is outstanding almost 17 Months and 22 days may pleased kindly be handed over to appellant, And any other relief and remedy deems justified by this Hon'ble Tribunal may also be passed in favour of the appellant.

APPELLANT

Syed Aziz Ahmed Shah

Through

Amin Ullah Jan
Advocate High Court

Muhammad Nasir Ghilzai
Advocate High Court

ad Ismail
eshawar

BETTER COPY

Annexure A

EXECUTIVE DISTRICT OFFICER (SCHOOLS AND AGENCY) MARDAN

No. 1532G

Dated: 22/02/2007

Recommendation:

Consequent upon the decision upon the decision of Hon'ble High Court Peshawar dated 14/02/2007 in writ petition no. 637/2005, 925/2005 and 926/2005 and advertisement published in the daily "Aaj" Peshawar dated 23/06/2004 and resulted interview held on 27/07/2004 by the instrs/ selection committee, the undersigned being competent authority is pleased to appoint the following TT (Male) candidates in **BPS-07 (Rs. 2555 -140-6755)** plus usual allowances admissible under the rules against the vacant TT Post at the schools noted against each with effect from the dates of their taking over charge in the interest of public service subject to the following existence terms and conditions: -

Ser	Name	Father's name	Residence	School where Appointed	Remarks
1.	Husamuddin	Muhammad Amin	Shakar Mori Gujar Garhi	GMS Mirbaz Ghaz	Against Vacant TT Post
2.	Mufti Amjad Ali	Khan Bahadar	Haji Killi Fazal Abad T/Bhai	GHS Khadi Killi	Against Vacant TT Post
3.	S.Aziz Ahmad Shah	Syed Ahmad Hussain	Bakhshali	GHS Gujrat	Against Vacant TT Post
4 to 46	X X X X	X X	X X	X X X	X X

TERMS AND CONDITIONS

1. Their appointments are made purely on contract policy 2005 and will not be entitled for pension/ gratuity as per policy and are liable to termination at any time without any notice or reason.
2. They are required to produce health and age certificates from the concerned Medical Superintendent before taking over charge.
3. They are not allowed to take over charge if their age is less than 18 years and above 38 years.
4. Their educational/ professional certificate/ degree should be verified from their concerned Board/ University before drawl of their pay and pay should not be released till the comparison of their score with merit list maintained in this office after verification.
5. No TA/DA is allowed.

105 J/C
 THE EXECUTIVE DIRECTOR (SCHOOLS) ATLETA, ALAHDAN
 hand over to the teacher total
 SNO 3 Mr. 10 N 23/02/07
 ANX. A

Consequent upon the decision of Hon'ble High Court Peshawar Dated: 14/02/2007 in
 Case No. 634/2005, 925/2005 and 926/2005 and advertisement published in the daily 'Yaf
 dated: 23/06/2004 and resulted interview held on 27/07/2004 by the
 selection committee, the undersigned being competent authority is pleased to appoint the
 following TT (Male) candidates in BPS-07 (Rs. 2555-140-6755) plus usual allowances as admissible
 under the rules against the vacant TT post at the schools noted against each with effect from the date
 of their taking over charge in the interest of public service subject to the following existence terms and
 conditions:

No	Name	Father's Name	Residence	School where Appointed	Remarks
1	Musamuudin	Muhammad Amin	Shakar Mori Gujar Garhi	GMS Mirbaz Ghaz	Against Vacant TT Post
2	Mufti Amjad Ali	Khan Bahadar	Haji Killi Fazal Abad T/Bhai	GHS Khadi Killi	Against Vacant TT Post
3	S. Aziz Ahmad Shah	Syeed Ahmad Hussain	Bakhshali	GHS Gujrat	Against Vacant TT Post
4	Hanif Ullah	Abdul Sattar	VPO Hathian	GHSS Hathian	Against Vacant TT Post
5	Zawar Hussain	Ihsanullah	Kas Koroona	GHS Naseer Killi	Against Vacant TT Post
6	Attaullah	Roohul Amin	Barath Kheil Babozai	GHSS Kohi Bannoi	Against Vacant TT Post
7	Gul Badshah	Tali Zar	Madi Baba	GMS Mohammad Dir. Killi	Against Vacant TT Post
8	Khalid Mehmood	Husnul Maab	Pump Killi Pir Abad	GHSS Takkar	Against Vacant TT Post
9	Muhammad Shuaib	Muhammad	Qutab Garh	GHS Jalala	Against Vacant TT Post
10	Q Muhammad Abrar	Q Fazal Badshah	Mayar	GMS Mohabat Abad	Against Vacant TT Post
11	Muhammad	Amir Shah	Inzargai Katlang	GHS Katlang	Against Vacant TT Post
12	Muhammad	Ghulam Dastagir	Gargar Toru Maira	GMS Mehmood Abad	Against Vacant TT Post
13	Noorul Haq	Sabir Khan	Arif Khan Killi Takht Bhai	GHS Parknoo	Against Vacant TT Post
14	Mushtaq Ali	Aman Gul	Haji Abad Rustam	GMS Nawan Killi Rustam	Against Vacant TT Post
15	Snoukat Ali	Mehboob-ur-Rehman	Kopar Pir Abad	GMS Tariq Abad	Against Vacant TT Post
16	Noorullah	Karim Dad	Gulshan Abad Mayar	GHS Gumbat	Against Vacant TT Post
17	Muhammad Hassan	Muhammad Ishaq	Moh. Pir Sahib Mazdoor Abad T/Bhai	GMS Gunjai	Against Vacant TT Post
18	Muneer Ahmad	Noor-ul-Haq	Bharat Kheil Babozai	GMS Bharat Kheil Babozai	Against Vacant TT Post
19	Siraj-ud-Din	Rahman Gul	Alo	GHS Sangaoo	Against Vacant TT Post
20	Muhammad Hussain	Muhammad Ishaq	Moh. Pir Sahib Mazdoor Abad T/Bhai	GHSS Takkar	Against Vacant TT Post
21	Muhammad ul Haq	Misbah Ahmad	Babozai	GHS Qasmi	Against Vacant TT Post
22	Muhammad Ibrahim	Muhammad Abdul Sattar	Kunj Katlang	GMS Shewa Banda	Against Vacant TT Post
23	Syed Akbar Sabir	Banjer Khan	Seri Behlol T/Bhai	GMS Shah Bag	Against Vacant TT Post
24	Aman Ullah	Muhammad Khan	Wazir Abad Khaksar Manzil	GMS Khazana Dheri	Against Vacant TT Post
				GHS Bala Garhi	Against Vacant TT Post


ATTESTED

Name	Father's Name	Residence	School where Appointed	Remarks
Shamsur Rahman	Gul Rahman	Rustam	GHS Bannagan	Against Vacant TT Post
Gul Sher Khan	Sham Sher Khan	Akbar Road Mardan	GHS Ghalla Dheri	Against Vacant TT Post
Riaz-ud-Din	Abdul Haleem	Mir Aman Killi Jhandai T/Bhai	GHS Sanga	Against Vacant TT Post
Syed Murtaza	Syed Muhammad Nabi	Bazar Rustam	GMS Cheena Rustam	Against Vacant TT Post
Aziz Ahmad	Bashir Ahmad	Pipal	GMS Pipal	Against Vacant TT Post
Fazli-karim	Fazli-i-Maabood	Mian Khan	GHSS Kohi Barmol	Against Vacant TT Post
Syed Riaz Ahmad	Syed Anwar Ahmad	Pishkand Rustam	GHS Machi	Against Vacant TT Post
Sher Bahadar	Hunar Gul	Garo Shah Takht Bhai	GMS Mehtar Ghundai	Against Vacant TT Post
Naeemullah	Abdul Ghani	Mayar	GHSS Garhi Kapura	Against Vacant TT Post
Rooh-ul-Amin	Momin Khan	Dara Lund Khwar	GMS Safi Abad	Against Vacant TT Post
Aabid-ur-rahman	Fazal Manan	Alo	GHS Alo	Against Vacant TT Post
S Muhammad Yahya Jan	Syed Shakir ullah Jan	Gaddar Mardan	GHS Gujrat	Against Vacant TT Post
Muhammad Arshad	Rahman Gul	Bari Cham Gujar Garhi	GHS Garyala	Against Vacant TT Post
Muhammad Jehanzeb	Abul Hasan	Abul Hassn Killi Fazal Abad T/Bhai	GMS Sadiq Abad	Against Vacant TT Post
Fayyaz Ali	Meher Muhammad	Sowaryan	GHS Dhakki	Against Vacant TT Post
Fazal Gatoor	Muhammad Ajmeer	Haji Koroona Baghdada	GMS Bhai Khan	Against Vacant TT Post
Fazli Rahim	Abdul Sattar	Khazana Dheri	GMS Khazana Dheri	Against Vacant TT Post
Abdul Aziz	Raham Karim	Irum Colony Mardan	GHSS Shahbaz Garhi	Against Vacant TT Post
Naseemul Haq	Abdul Haq	Alo	GHS Ikrampur	Against Vacant TT Post
Muhammad Ali	Nazeer Ullah	Guli Bagh Sawai Dheri	GMS Spelano Dheri	Against Vacant TT Post
Mukhtar Alam	Knan Badshah	Jungara Gujrat	GMS Landai	Against Vacant TT Post

TERMS AND CONDITIONS:

- 1- Their appointments are made purely on contract policy 2005 and will not be entitled for pension / Gratuity as per policy and are liable to termination at any time without any notice or reason.
- 2- They are required to produce health and age certificates from the concerned Medical Superintendent before taking over charge.
- 3- They are not allowed to take over charge if their age is less than 18 years and above 38 years.
- 4- Their educational/professional certificates/degree should be verified from the concerned Board/University before draw of their pay and pay should not be released without the comparison of their score with merit list maintained in this office after verification.
- 5- No TA/DA is allowed.

ATTESTED

تقلمد 19 روزنامی 3 10
17

صہلہ خان

میر 19 رپورٹ سید شہین احمد شاہ ولد سید احمد حسین قوم افغان نمبر 47/4 سال سکندہ کشمال
 حافظ آباد حال شیخ گلشن ٹاؤن مردان سیکٹر B سٹریٹ نمبر 10:10 اور روزنامی 3 10
 مجاہدی کمانچون آکر لویل رپورٹ کرنا حدیث عودہ 03 17 09 کو برادر ال ام سید عزیز اللہ شاہ عرف
 سردار حاجی نمبر 40/4 سال سید سعید اللہ شاہ عرف جان حاجی سواری خوش سائیکل جانب
 مردان سے ہیں رپورٹ کشمال پیر لہون کشمال مجاہد تھے جب بوقت قریب 11:30 اور 12:00 مقام نزد
 BHL کشمال پورچ ٹو اس دوران ان سے ایک ڈیل سین ڈو گاڑی بزنس برادران آئے
 جو کہ جس کا بزنس ڈیلنگ نامیوں فوانڈنگ تھا جو کہیں کو رو کر دعا سلام کرنے کے بعد برادر ام
 سید عزیز اللہ شاہ عرف سردار حاجی کو کہا کہ ہم انجیر سے تعلق رکھنے والے سواری ایجنٹوں
 ہیں آپ کی ملکیت نشن ضرور رکھیں اور برادر ام ضرور کو چھینے ساتھ گاڑی میں بیٹھا
 کر لطف سردان چلے گئے۔ برادر ام ایک سیکرٹ ٹیکسٹ اور گورنمنٹ ہائی سکول کجرات
 میں اسلامیات پڑھاتے ہیں۔ حوالہ نمبر 9886132-0313 اسٹیمال کر رہے تھے جو ہی اب
 بند آ رہا ہے۔ اور دیگر کوئی رابطہ نہیں آیا ہے۔ سردار سے اطلاع رپورٹ دیا گیا ہے کہ
 کہ تقریباً 9 سال قبل ہی برادر ضرورہ کی اسی طرح سیکرٹس ہو چکی ہے۔ اطلاعاً
 دیکھا جائے۔ البتہ انگریزی کارروائی پولیس سے گفتہ سائن رپورٹ درج مان سے کر لیا گیا
 سمجھایا جا کر جس نے زیر رپورٹ خود درستگی کا وعدہ شدت کی جگہ میں نشدہ کرنا میں
 رپورٹ نشدہ اطلاعاً رپورٹ درج کئے رپورٹ کثرت رفعت آیا گیا۔ جیلہ تقلمد علیحدہ عربی
 کر کے لفرنی عناصر کارروائی حوالہ سیکرٹ آفس سردان خان نے کیا گیا ہے حدیث عربی میں
 رپورٹ درج روزنامی 3 10

صہلہ خان
 لعل سلطان اللہ خان
 mm-p8-clh
 18-3-17

ATTESTED

بکھنور جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب مردان

عنوان درخواست برائے برآمدگی بنایا گیا 01-03-17 تا حال و ملازمت

جناب عالی!

مردانہ گزارش کی جاتی ہے کہ

نمبر: سائل محکمہ تعلیم گورنمنٹ شہید شفیق الرحمان ہائیر سیکنڈری سکول گجرات مردان میں بحیثیت (BPS-16) STT(09-03-17) تک ڈیوٹی سرانجام دیتا رہا۔

نمبر: 09-03-17 کو بد قسمتی سے مجھے پاکستان کے خفیہ ایجنسیوں نے کسی نامعلوم شک کی بنا پر اور نامعلوم مقام پر لے گیا۔

نمبر: 13 جسکی FIR میرے بھائی نے درج کرائی تھی اور محکمہ تعلیم کے آفسران بالا کو آگاہ کر دیا تھا۔ نیز محکمہ تعلیم نے اس بابت ایکویٹری بھی کرائی ہیں لیکن کوئی نتیجہ ابھی تک اخذ نہیں کیا گیا ہے۔

نمبر: 14 سائل ایک سال 5 ماہ اور 22 دن تک ان کی قید میں رہا۔ اور 31-08-18 کورٹ کے وقت سائل کو چھوڑ دیا۔

نمبر: 15 اب سائل نے 01-09-18 سے اپنے فرائض منصبی ادا کرنے کیلئے اپنے سکول میں رپورٹ کیا ہے۔

اسلئے آپ صاحبان مہربانی فرما کر سائل کی تنخواہ مورخہ 01-03-17 سے دینے اور ڈیوٹی پر بحال ہونے

کے احکامات صادر فرمائیں۔ سائل تا عمر دعا گور ہے گا۔

نوٹ: جناب عالی FIR اور متعلقہ کاغذات شامل درخواست ہیں۔

العارض

المترقوم: 01-09-18

آپکا تابع فرمان سید عزیز احمد شاہ STT (GSSHSS) گجرات (مردان)

Cell: 0313-9856132

ATTESTED

9
ANK-D

OFFICE OF THE PRINCIPAL GOVT, SHAHEED SHAFIQ UR REHMAN HIGHER SECONDARY SCHOOL
GUJRAT MARDAN.

NO 248 /

Dated 4/9/2018

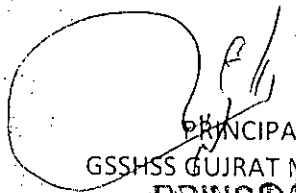
To

The District Education Officer
Male Mardan.

Subject:- APPLICATION FOR RESUME SERVICE AND PAY WEF 1/3/2017 IN R/O SYED AZIZ
AHMAD SHAH STT.

Memo:-

Enclosed please find herewith Original application in respect of Syed Aziz Ahmad Shah STT of
this School for further necessary action please.


PRINCIPAL
GSSHSS GUJRAT MARDAN
PRINCIPAL
GSSHSS Gujrat
Mardan


ATTESTED

(10)
ANX-E 71

INQUIRY REPORT

GENERAL REMARKS & REFERENCES

Inquiry Committee: Hafiz Zubair Ahmad, Principal GCMHS No.3 Mardan
Reference: DEO (M) Mardan Letter No.7092-95 dated 19.09.2018
Date of Inquiry: 01.10.2018
Inquiry against: Mr Aziz Ahmad Shah STT GHSS Gujrat Mardan
Purpose of Inquiry: To check the attendance record and other documentary proofs in r/o Mr Aziz Ahmad Shah STT

Terms of References (ToRs) of the Inquiry

The following ToRs have already been framed for the said inquiry from the Office order of the undersigned as inquiry officer, issued by the Honorable DEO Male Mardan:

1. To submit report in r/o Aziz Ahmad Shah STT, after having released from the custody of law enforcement agencies, since his arrest on 09.03.2017.

History and Background of the Inquiry

Mr Aziz Ahmad Shah is working at GHSS Gujrat against the post of STT since his appointment/posting as per departmental order No 1532/G dated: 22.02.2007. On March 10, 2017, the said teacher remained absent from the school duty consecutively. According to the FIR No. DD 19 Police Station Chooria dated 10.03.2017, lodged by his brother, the teacher Mr Aziz Ahmad Shah was picked up by some unknown persons while they were going on their motorcycle to Mardan from Bakhshali on 09.03.2017; and since then, he was missing. After receiving the report, the Principal concerned reported to the office and stopped his salary of March 2017. The office conducted an inquiry regarding his attendance and situation after his absence, complete report of which was submitted. On September 01, 2018, the absent teacher Mr Aziz Ahmad Shah reported his arrival to the Principal of the school with request to allow him for joining his duty (annex-1). The application was properly forwarded to the DEO (M) Mardan for consideration accordingly (annex-2). In light of the application, the DEO Mardan, as competent authority, appointed the undersigned for re-inquiry in this regard as per reference mentioned above.


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Procedure of the Inquiry

In light of the DEO's notification, the Inquiry officer, called the applicant through the School Principal for face-to-face personal hearing regarding his absence since 09.03.2017 up to 01.09.2018. The undersigned prepared a questionnaire for the applicant (annex-3) to submit his responses in written form. The Principal of GHSS Gujrat was requested to submit his official report regarding performance of Mr aziz ahmad Shah STT as immediate officer. The Principal submitted his report of satisfaction to the Inquiry Officer in favor of Aziz Ahmad Shah STT (annex-4). The applicant submitted his detailed replies to all areas of the questionnaire (annex-5). On the basis of his responses, the findings were drawn by the inquiry officer.

The following enclosures are therefore attached herewith:


- Application of the applicant regarding resumption of his duty in school. (annex-1)
- Forwarding letter of the School Principal to DEO Mardan (annex-2)
- Statement of the Principal for favor regarding joining of duty (annex-3)
- Questionnaire for the applicant (10 questions): (annex-4)
- Statement/Responses in the Questions by the applicant. (annex-5)

Findings of the Inquiry

After thorough analysis of the required documents, personal hearing and responses submitted in written, the inquiry officer therefore reached the following fact finding conclusion:

1. Mr Aziz Ahmad Shah STT remained absent after he was picked up by unknown persons, reported by the teacher as belonging the law enforcement agencies, on 09.03.2017 on his way when he was going to Mardan on motorbike with his brother who, later on, launched FIR on 10.03.2017. Report was registered by his brother on 10.03.2017 in *Thana Chooru* regarding his brother's missing status.


ATTESTED


Page 3 of 5
S/10
12

2. The existing position of the applicant is that his Pay was immediately stopped by the School Principal as DDO and is still blocked.
3. The applicant was in no position to communicate either with his office or even his family. What is concluded of his situation is that he was totally helpless in front of the long procedure of investigation of the law enforcement agencies.
4. Out of all his interviews and written replies, his patriotism and respect for nationhood was found up to the mark. No feeling of anti-state nature could be found
5. He was released from custody after his innocence was ensured during the investigation, and no charge of anti-state activities was witnessed.
6. Conclusion of the Inquiry

Mr Aziz Ahmad Shah remained missing /absent from 10.03.2017 up to 31.08.2018. However, absence of this nature cannot be declared as "willful" as he was totally helpless in getting himself released from the custody of the law enforcement agencies. According to the previous inquiry report and report of satisfaction by the School Principal as immediate Boss, Mr Aziz Ahmad Shah STT has always been found punctual and dedicated which shows his love for duty. Further, he has reported his arrival and resumed his duty on 01.09.2018 and is regularly coming since then. The absence on behalf of Mr Aziz Ahmad Shah STT is neither willful nor habitual. His salary is stopped from 01.03.2017 up to 31.08.2018 (18 months)

Recommendations


On the basis of the above facts and figures, the following recommendations are therefore submitted:


1. As Mr Aziz Ahmad Shah STT is neither willfully absent nor habitually absent from his duties, so his application of reinstatement may be favorably considered, being a dedicated and punctual teacher as per report of the school Principal
2. The absence of Mr Aziz ahmad Shah STT may be taken as "on leave" because he was being investigated in the larger interest of the country against any involvement in


ATTESTED

any anti-state activities, unless otherwise reported by the concerned law enforcement agencies.

- 3. Keeping in view the nature of absence, (neither habitual nor willful) in respect of Aziz Ahmad Shah, it is recommended that his pay may be released as per financial rules and procedure accordingly after fulfilling all the required codal formalities in this regard.
- 4. As findings and recommendations of this report are based mainly on the information provided by the applicant Mr Aziz Ahmad Shah STT, so he will be responsible for all his truthfulness or otherwise, if found wrong, false or contradictory in any course of future time, either by the department or the concerned law enforcement agencies.


 Hafiz Zubair Ahmad
 Principal GCMIS No.3Mardan
 Inquiry Officer


ATTESTED



OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) MARDAN

(14)

ANX-F

OFFICE ORDER

Consequent upon the recommendation of the Enquiry Officer Mr. Aziz Ahmad Shah STT GHSS Gujarat is hereby adjusted against his original STT post in the same school with effect from 01-09-2018 in the interest of public service.

Note:- His detention period with effect from 10-03-2017 to 31-08-2018 for conversion in to leave may be sent to this office for further process of the case.

(IJAZ ALI KHAN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

7907-09

Endst:No. _____/V:I/E.file/Aziz Ahmad Shah/STT Dated 17-10-/2018.

Copy forwarded for information to the:-

1. Principal GHSS Gujarat Mardan
2. District Accounts Officer, Mardan.
3. Official Concerned.
4. Gen: File.

DISTRICT EDUCATION OFFICER
(MALE) MARDAN

ATTESTED



OFFICE OF THE PRINCIPAL
Government Centennial Model High School No.3 Mardan
Endst : No.1093

Dated: 05.10.2018

15

ANK-67

The District Education Officer (Male),
Department of Elementary & Secondary
Education Mardan.

Subject: Re-Inquiry in respect of Mr. Aziz Ahmad Shah STT GHSS Gujrat

Memo:

With reference to your Office Order No. 7092-95 dated Mardan, September 19, 2018, the re-inquiry report in respect of Mr Aziz Ahmad Shah STT GHSS Gujrat Mardan regarding his release after long absence, and other relevant documentary record since his resumption of charge is hereby submitted for further necessary action please.

01.10.2018,

Hafiz Zubair Ahmad
Inquiry Officer, Principal
GCMHS No.3 Mardan

5453

9-10-18

DAC(D)

29/10/18

ATTESTED

محمد حسرت جناب ڈائریکٹر صاحب محکمہ تعلیم خیبر پختونخوا پشاور

جناب عالی! درخواست بمراد ادائیگی بقایا جات/تخوہ والا ونسز WEF 10-03-17 to 31-08-2018

مودبانہ گزارش ہے کہ میں مورخہ 23-02-2007 سے محکمہ تعلیم میں مستقل بنیادوں پر تعینات ہوں۔

سائل محکمہ تعلیم گورنمنٹ شہید شفیق المر رحمان ہائی اسکول گجرات میں بحیثیت STT BPS-16 09-03-207 تک ڈیوٹی سرانجام دیتا رہا بد قسمتی سے ری سس کے دوران گھرت سکول واپس آتے ہی راستے میں خفیہ ایجنسی کے نامعلوم اہلکاروں نے گرفتار کر کے نامعلوم مقام پر منتقل کر دیا جسکی FIR 10-03-2017 کو میرے بھائی نے درج کرائی تھی۔ ایک سال 5 ماہ 22 دن ایجنسی کے

حراست میں رہنے کے بعد 31-08-18 کو رات کے وقت مجھے clear کر کے باعزت طور پر رہا کر دیا۔ رہائی کے اگلے روز 01-09-18 کو میں نے سکول کو رپورٹ کیا اور پرنسپل صاحب کی خدمت میں درخواست پیش کرتے ہوئے عرض کی مجھے اپنے پوسٹ پر

دوبارہ کام کرنے اور تخوہ اجاری کرنے کے ادکامات صادر فرمائیں۔ انہوں نے یہ درخواست اپنی DEO, comments میں

مردان صاحب کو لکھوا دیا۔ DEO صاحب نے فوری کارروائی کرتے ہوئے انکو اٹری مقرر کی۔

انکو اٹری آفسر صاحب نے انکو اٹری کر کے میری گزارشات کو درست قرار دیتے ہوئے DEO صاحب کی خدمت میں رپورٹ دیکر کہ درخواست گزار واقعی ایجنسی کی حراست میں تھا اور یہ کہ ان کی غیر حاضری ارادتا اور قصد نہیں تھی۔

جناب DEO صاحب نے Recommend کیا کہ ان کی غیر حاضری کی مدت 10-03-17 تا 31-08-18

conversion into leave میں شامل کیا جائے۔ درآں حال یہ کہ میری غیر حاضری میں میرا کوئی قصور نہیں تھا بلکہ میری غیر

حاضری میری مجبوری اور بے بسی کی وجہ سے تھی۔

اسلئے آپ صاحبان کی خدمت اقدس میں التجا کی جاتی ہے کہ مسائل کے حالات زار پر رحم فرما کر اس سلسلے میں بندہ کو on duty تصور

کر کے تمام تخوہ اور جملہ الا ونسز ادا کرنے کے ادکامات صادر فرما کر مشکور و ممنون فرمادیں۔

بندہ تاحیات دعاگوں رہے گا۔

مورخہ: 20-10-2018

العارض
آپ کا تابع فرمان سید عزیز احمد شاہ STT

گورنمنٹ شہید شفیق المر رحمان ہائی اسکول گجرات مردان

DEO (M) Mardan

Resolve his issue
by providing justice
to him strictly in accordance
with the rules and policy.

ATTESTED

11/7/18

(17)

ANX-1

OFFICE OF THE PRINCIPAL GOVT; SHAHEED SHAFIQ UR RAHMAN
HIGHER SECONDARY SCHOOL GUJRAT MARDAN

NO 230 /

DATED 31/10/2018.

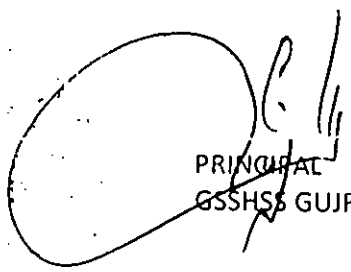
TO

The District Education Officer
Male Mardan.

Subject:- APPLICATION FOR PAY & ALLOWANCES WEF 10/3/17 TO 31/8/2018

Memo:-

Enclosed please find herewith application in r/o Syed Aziz Ahmad Shah STT of this School on the subject cited above for onward submission to the quarter concerned please.


PRINCIPAL
GSSHSS GUJRAT MARDAN


ATTESTED



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) MARDAN



☎ & 📠 0937-933151 , 📧 deomalemardan@gmail.com

NO. 10893
To,

Dated. 25-9-2019

The Principal, ✓
GSSHSS Gujarat Mardan.

Subject: APPLICATION FOR PAY AND ALLOWENCE W.E.F 10/3/17 TO 31/8/2018.

Memo:

Reference your letter No. 132 dated 21/08/2019.

The request for the subject cited above has been considered and rejected with the remarks that "No Clarence certificate has been provided" the applicant may be informed accordingly.

(ZULFIQAR UL MULK)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Ensdtd No _____/PF/Aziz/2017-19/STT

Dated _____/2019.

1. Gen. file

ATTESTED

تصدیق کی جاتی ہے۔ کہ میں سید عزیز احمد شاہ ولد سید احمد حسن
 ساکن کھٹائی محلہ جلسی وال تحصیل قلعہ لانہ سابق ریاستی
 وید اسٹیٹس۔ بنڈہ 9³/₂₀₁₇ سے 31⁸/₂₀₁₈ تک نامعلوم خفیہ اجنبی کی طرح رہا
 میں ان کو ذاتی طور پر جانتا ہوں۔ ضرورہ بنڈہ اعلیٰ
 کردار کا مالک ہے۔ خوں اخلاق و ملنسار انسان ہے۔ یہ کسی قوم
 کے غیر قانونی سرگرمیوں میں ملوث نہیں ہے۔
 اسکے خلاف کوئی کیس درج نہیں ہوا ہے۔ یہ بنڈہ بطور
 (S.T.A) سینئر سیکرٹری اسلامیات گورنمنٹ سید سقی الرحمن (رہم)
 پرائمری سکول کجرات میں فرائض منصبی سر انجام
 دے رہا ہے۔ بطور مدرس اسکی کارکردگی قابل ستائش ہے۔
 لہذا رپورٹ دربارہ صفائی عرض ہے۔

NAZIR
 V/O Bakhsal
 Distt: Mardan
 16101-9891604-3
 03459359927




16/01/2018
 16101-9891604-3
 03459359927
 Qazi Dushir Ahmad
 District Council
 Bakhsal Mardan

جناب عالی!

برائے مال و کھاد و مقام سے میں سید عزیز احمد شاہ
 ولد سید احمد حسین ساکن کھٹائی محلہ
 چورہ کو کسی جسم میں مطلوب نہیں
 ہے رپورٹ صرف ہے۔

CH080
 19-02-19

ATTESTED

50 روپے	34166			
ایڈوکیٹ: امین الرحمن و منیر امین علی خان		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: 132-15-8076				
رابطہ نمبر: 0312-9136048				

بعدالت جناب: سر و سسٹر سوشل لیکوٹی کے لیے شیڈور

مخانب: اسپیلانٹ / سپرٹنڈنٹ / ایڈووکیٹ / ایڈووکیٹ	دعویٰ: Appeal to PST
سپرٹنڈنٹ / ایڈووکیٹ	علت نمبر: Appeal No. 2083/19
بنام	مورخہ:
EDD میں سدوٹن	جرم:
	تھانہ:

بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام لکھنپور کیلئے محمد ناصر علی، امین الرحمن، امین علی خان اور رکنین کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 2019-11-24

العبد العبد
مقام: سر و سسٹر سوشل لیکوٹی کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

محمد ناصر علی

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No: 2083/2019

Syed Aziz Ahmed Shah S/O Syed Ahmad Hussain, R/O Mohallah Bakhshail,
Tehsil & District Mardan.....(Appellant)

VERSUS

Peshawar The Govt of KPK through Secretary Elementary & Secondary Education
KPK & Others.....(Respondents)

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	06
2	Copy of adjusted Order dated 17- 10-2018	A	07	*****

Respondent

**District Education Officer
(Male) Mardan**

(2)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No: 2083/2019

Syed Aziz Ahmed Shah S/O Syed Ahmad Hussain, R/O Mohallah Bakhshail,
Tehsil & District Mardan..... (Appellant)

V E R S U S

Peshawar The Govt of KPK through Secretary Elementary & Secondary Education
KPK & Others.....(Respondents)

Para Wise Comments on Behalf of Respondents No 1 to 4

Respectfully, Sheweth,

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action as well as locus standi, to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to this Honorable Tribunal with clean hands.
6. That the appellant is estopped by his own conduct.
7. That the appellant has concealed the material facts from this Honorable tribunal hence appeal is liable to be dismissed.
8. That the instant appeal is against the prevailing law and rules.
9. That the appellant has adjusted on the basis of humanity ^{avian} ground with effect from 01-09-2018 in the interest of public service, and his detention period with effect from 10-03-2017 to 31-08-2018 for conversion in to leave.

(Copy of Order is as Annexure A)

10. That the detention story of the appellant is self-made story and is not believable, because the appellant has not produced any documents which show that he was picked up / arrested by state law enforcement agencies.
11. That the appellant has not provided **Clarence Certificate to the department.**

FACT:

1. Para No 1 Pertains to record, hence needs no comments.
2. Para No 2 Pertains to record, hence needs no comments.
3. Para No 3 Pertains to record, hence needs no comments.
4. Para No 4 is incorrect, baseless, against fact & law, as the appellant stated himself that he was arrested by unknown person, it means the appellant has not arrested by the state law enforcement agencies, hence denied.
5. Para No 5 is incorrect, baseless, against fact & law, as the detention story of the appellant is self-made story and is not believable, because the appellant has not produced any documents which show that he was picked up / arrested by state law enforcement agencies. That the appellant has not provided **Clarence Certificate to the department**. Furthermore, the appellant himself stated in this para that , he was arrested by unknown person, (Probably the state Law Enforcement Agencies/ Security Agencies) it means that the appellant is not sure that he was arrested by the state Law Enforcement Agencies, hence denied .
6. Para No 6 is incorrect, baseless, as the respondents being the competent authority acted in accordance with law and rules. The appellant has not performed his duty, and this period is considered in to leave, hence denied.
7. Para No 7 Pertains to record, however the Inquiry Officer Recommended in para No 4 in his Inquiry Report, that this report is based on the information provided by the appellant, so he will be responsible for all his truthfulness, hence needs no comments.

(Copy of Inquiry Report is as Annexure E with the Service Appeal)

8. Para No 8 Pertains to record, hence needs no comments.
9. Para No 9 is incorrect, baseless, against fact & law, as the appellant has adjusted on the basis of humanitarian ground with effect from 01-09-2018 in the interest of public service, and his detention period with effect from 10-03-2017 to 31-08-2018 for conversion in to leave.

(Copy of Order is as Annexure A)

10. Para No 10 is incorrect, baseless, as the police only verified that the appellant has no previous criminal history and not convicted in crime. The report of U/C Nazam is not believable because there is contradiction between the statement of the U/C Nazam and the appellant. The U/C Nazam has surely stated, that the appellant was in the custody of secrete Agencies , while the

④

Other hand the appellant himself stated that he was arrested by unknown person, (Probably the state Law Enforcement Agencies/ Security Agencies).

(Copy of Report is as Annexure K with the Service Appeal)

However detail reply of the grounds is as under:

GROUND:

A. Para A is incorrect, baseless, against fact & law, as the respondents completed all codal formalities, and has not violated of the procedure hence denied.

B. Para B is related to his personal matters, hence needs no comments.

C. Para C is incorrect, baseless, against law as the appellant has adjusted on the basis of humanity ground with effect from 01-09-2018 in the interest of public service, and the respondent has released pay of the appellant and para of the recommendation is regarding to pay release and is not regarding to the arrear, hence denied.

(Copy of Inquiry Report is as Annexure K with the Service Appeal)

D. Para D is incorrect, baseless, against the facts & law, as the Order of the respondent is legal, effective, and is not liable to be set aside, hence denied.

E. Para E is incorrect, baseless, against the facts & law, as the respondents being a responsible Govt Officer acted in accordance with law and rules.

F. Para No F is related to his personal matters, hence needs no comments.

G. Para G is incorrect, Each and every case has their own merits, hence denied.

H. Para H is incorrect, baseless, against facts & law, as the respondents being a responsible Govt Officer acted in accordance with law and rules. The appellant has not performed his duty, and this period is consider in to leave, and the appellant has not deprive his rights, hence denied.

I. Para I is incorrect, baseless, against facts & law, as the respondents being a responsible Govt Officer acted in accordance with law and rules.

The appellant has not performed his duty, and this period is consider in to leave, and the appellant has not deprive his rights, hence denied.

J. Para J, needs no comments.

That the respondent seeks permission to raise additional grounds at the time of arguments.

It is therefore humbly prayed that in the light of above facts, the appeal may please be dismissed with cost.

[Handwritten signature]
Respondents

[Handwritten signature]
District Education Officer
(Male) Mardan

[Handwritten signature]
Director of (E&SE)
Education KPK, Peshawar

[Handwritten signature]
Secretary of (E&SE)
Education KPK, Peshawar

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No: 2083/2019

Syed Aziz Ahmed Shah S/O Syed Ahmad Hussain, R/O Mohallah Bakhshail,
Tehsil & District Mardan..... (Appellant)

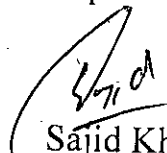
V E R S U S

Peshawar The Govt of KPK through Secretary Elementary & Secondary Education
KPK & Others..... (Respondents)

AFFIDAVIT

I, Mr Sajid Khan Litigation Officer Education Department Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by on behalf of Respondents No 1 to 4 are true to the best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.

Deponent


Sajid Khan


16101-6005318-5

Annex A (07)

(7)



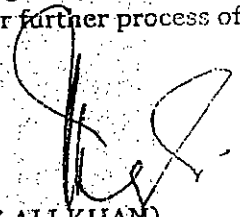
OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) MARDAN


AJX DE

OFFICE ORDER

Consequent upon the recommendation of the Enquiry Officer Mr. Aziz Ahmad Shah SIT GHSS Gujarat is hereby adjusted against his original SIT post in the same school with effect from 01-09-2018 in the interest of public service.

Note: - His detention period with effect from 10-03-2017 to 31-08-2018 for conversion in to leave may be sent to this office for further process of the case.

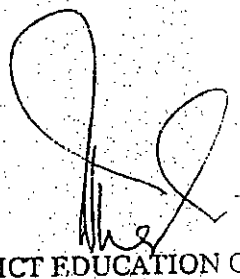


(JAZ ALI KHAN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Endst:No. 7907-09 /V:I/E.file/Aziz Ahmad Shah/SIT Dated 17-10-2018.

Copy forwarded for information to the:-

1. Principal GHSS Gujarat Mardan
2. District Accounts Officer, Mardan.
3. Official Concerned.
4. Gen: File.


DISTRICT EDUCATION OFFICER
(MALE) MARDAN

رہنما ادنیٰ کو
410000
دیجا ہے۔

Reference

بخدمت جناب ڈائریکٹر محکمہ تعلیم، خیبر پختونخواہ پشاور

مضمون: درخواست برادار کی تقاضا حرات، تنخواہ والا ڈسٹریکٹ

جناب عالی

مؤدبانہ گزارش ہے کہ:

- (1) میں 18 مارچ 1992ء سے محکمہ تعلیم میں مستقل بنیادوں پر تعینات ہوں۔
- (2) 18 اگست 2014ء کو جبکہ میں GHSS گوجرگڑھی میں CT پر کام کر رہا تھا، رات کے وقت فوجی وردی میں لہوس پاکب آری کے اہلکاروں نے ہمارے گھریں چھاپہ مارا اور مجھے گرفتار کر کے نامعلوم مقام پر منتقل کر دیا۔
- (3) 22 ماہ اور 8 دن فوج کی جراثیمت میں رہنے کے بعد 16 جون 2015ء مجھے Clear کر کے باعزت طور پر رہا کر دیا۔
- (4) رہائی کے اگلے روز یعنی 17 جون 2016ء کو میں نے سکول کی رپورٹ کیا اور پرنسپل صاحب کی خدمت میں تحریری درخواست پیش کرتے ہوئے عرض کی کہ مجھے اپنے پوسٹ پر دوبارہ کام کرنے اور تنخواہ جاری کرنے کے احکامات صادر فرمائیں۔ انہوں نے یہ درخواست اپنی Comments کے ساتھ D.E.O صاحب کو Forward کیا۔
- (5) D.E.O صاحب نے فوری کارروائی کرتے ہوئے اس سلسلے میں انکواری مقرر کی۔
- (6) انکواری آفیسر صاحب نے میرے سکول اور میرے محلے کا دورہ کیا۔ پرنسپل صاحب، اساتذہ صاحبان اور میرے محلے کے چند افراد کے بیانات قلم بند کئے اور میری گزارشات کو درست قرار دینے ہوئے D.E.O صاحب کی خدمت میں رپورٹ کیا کہ درخواست گزار واقعی پاک فوج کی جراثیمت میں تھا اور یہ کہ ان کی غیر حاضری ارادتاہر قصداً نہیں تھی۔
- (7) پھر انہوں نے Recommend کیا کہ ان کی غیر حاضری کی مدت یکم ستمبر 2014ء تا 16 جون 2016ء Extra Ordinary Leave میں شمار کیا جائے، درآں حال کہ میری غیر حاضری میں میرا کوئی تصور نہیں تھا۔ بلکہ میری غیر حاضری میری مجبوری اور بے بسی کی وجہ سے تھی۔
- لہذا آجی ہوں کہ اس سلسلے میں مجھے On-Duty تصور کر کے تمام تنخواہ اور جملہ Allowances ادا کرنے کے احکامات صادر فرما کر مشکور و ممنون فرمائیں۔

عین نوآزش دہرانی ہوگی

الغرض

آپ کا تابع فرمان

C.T خان

G.H.S.S گوجرگڑھی مریان

11/08/2016

OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) MARDAN.

NO. 946 /

DATED 28/11 /2016.

To,

The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject: SALARY & OTHER ALLOWANCES ARREARS.

Memo:

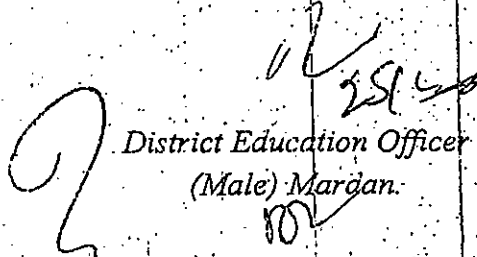
Reference your office letter No.885/1035/A-15/KC(10) dated 13-10-2016 on the subject cited above.

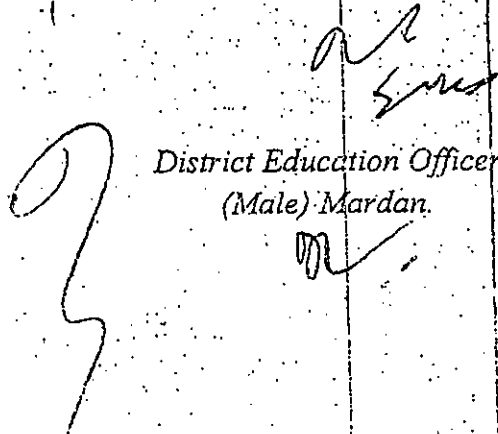
It is submitted that the said teacher was taken by the army for some purpose best known to them on 08-08-2014 and was released on 16-06-2016. In this case an inquiry was conducted and in the light of the recommendation of that inquiry the said official was adjusted on his original CT post in the same school w.e.f 17-06-2016. The detention period was converted into half pay for 286 days and without pay for 369 days. Presently the said official has applied for full pay/allowances for the whole missing period in a self-explanatory application attached.

Endst: No. 947 /

Copy forwarded for information to the:-

1. Principal GHSS Gujar Gorkhi Mardan.


District Education Officer
(Male) Mardan.


District Education Officer
(Male) Mardan.

OFFICE OF THE DISTRICT EDUCATION OFFICE (MALE) MARDAN

OFFICE ORDER.

Consequent upon the recommendation of the enquiry officer Mr. Muntazir Khan CT GHSS Gujar Garhi is hereby adjusted against vacant CT post in the same school w.e.f from 17/06/2016 in the interest of public service.

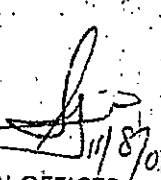
- Note:-
1. The detention period w.e.f 01.09.2014 to 13.06.2015 (286) day on half pay and w.e.f 14.06.2015 to 16.06.2016 (369) days with out pay.
 2. Necessary entry should be made in his service book.

(SIRAJ MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

Endst: No. 5825-27 /PF/Muntazir Khan CT. Dated 11/08/2016.

Copy forwarded for information and necessary action to the:-

1. Principal GHSS Gujar Garhi Mardan.
2. District Accounts Officer Mardan.
3. Teacher Concerned.


DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.

OFFICE ORDER.

Consequent upon the recommendation of the provincial Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar letter No.2239/F.No.1035/A-15/KC/10 dated 07.02.2017, Sanction is hereby accorded for the grant of detention period in favour of Mr.Muntazir Khan CT (B-15) Government Higher Secondary School Gujar Garhi (Mardan) already granted leave with half pay and without vide this office Endst:No.5825-27 dated 11/08/2016, is hereby considered as on duty as the teacher was in the custody of Pak Army being competent authority under the rules with effect from 08.08.2014 to 16.06.2016.

Note. Necessary entry to this effect should be made in his service book.

(ZIA UD DIN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

Endst:No. 1617-18 /PF file. Dated 17 / 02 2017.

Copy forwarded for information and necessary action to the:-

1. PA to Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Principal GHSS Gujar Garhi (Mardan)
3. District Accounts Officer Mardan.
4. Teacher concerned.

6-7
16/11/17
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.



**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

NO. 2239 / F.No.1035/A-15/KC/10

Dated Peshawar the 7/2 /2017

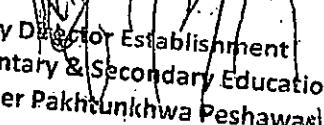
To

The District Education Officer
(Male) Mardan

SUBJECT:- SALARY AND OTHER ALLOWANCES ARREARS.

Memo:-

I am directed to refer to your letter No.9416 dated 28-11-2016, on the subject cited above and to inform you that the detention period of the teacher concerned may be considered as on duty as he was in the custody of Pak Army being competent authority under the rules please.


Deputy Director Establishment
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. _____

Copy forwarded to the:-

1- PA to Director E&SE Local Office.

Deputy Director Establishment
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

/Noor/16/



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

NO. 2239 / F.No.1035/A-15/KC/10

Dated Peshawar the 7/2 /2017

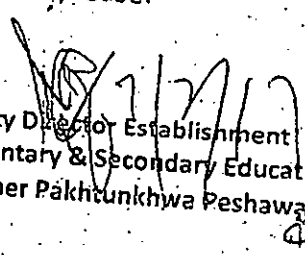
To

The District Education Officer
(Male) Mardan

SUBJECT:- SALARY AND OTHER ALLOWANCES ARREARS.

Memo:-

I am directed to refer to your letter No.9416 dated 28-11-2016, on the subject cited above and to inform you that the detention period of the teacher concerned may be considered as on duty as he was in the custody of Pak Army being competent authority under the rules please.


Deputy Director Establishment
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. _____

Copy forwarded to the:-

1- PA to Director E&SE Local Office.

Deputy Director Establishment
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

/Noor/16/

Mr. Muntazir Khan, CI
GHS Gujral Ghari (Mardan)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.

OFFICE ORDER.

Consequent upon the recommendation of the provincial Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar letter No.2239/F.No.1035/A-15/KC/10 dated 07.02.2017, Sanction is hereby accorded for the grant of detention period in favour of Mr.Muntazir Khan CT (B-15) Government Higher Secondary School Gujar Garhi (Mardan) already granted leave with half pay and without vide this office. Endst:No.5825-27 dated 11/08/2016, is hereby considered as on duty as the teacher was in the custody of Pak Army being competent authority under the rules with effect from 08.08.2014 to 16.06.2016.

Note. Necessary entry to this effect should be made in his service book.

(ZIA UD DIN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

Endst:No. 16.17-18 /PF file. Dated 17 / 02 2017.

Copy forwarded for information and necessary action to the:-

1. PA to Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Principal GHSS Gujar Garhi (Mardan)
3. District Accounts Officer Mardan.
4. Teacher concerned.

1-7
16/1/17
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) MARDAN.

NO. 9416 /

DATED 23/11 /2016.

To,

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject: SALARY & OTHER ALLOWANCES ARREARS.

Memo:

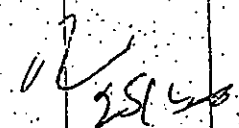
Reference your office letter No.885/1035/A-15/KC(10) dated 13-10-2016 on the subject cited above.

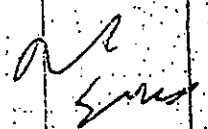
It is submitted that the said teacher was taken by the army for some purpose best known to them on 08-08-2014 and was released on 16-06-2016. In this case an inquiry was conducted and in the light of the recommendation of that inquiry the said official was adjusted on his original CT post in the same school w.e.f 17-06-2016. The detention period was converted into half pay for 286 days and without pay for 369 days. Presently the said official has applied for full pay/allowances for the whole missing period in a self-explanatory application attached.

Endst: No. 9417 /

Copy forwarded for information to the:-

1. Principal GHSS Gujar Garhi Mardan.


District Education Officer
(Male) Mardan.


District Education Officer
(Male) Mardan.

اس آڈیٹ کو
دیکھو
وہ کیا ہے -

Reference

بخدمت جناب ڈائریکٹر محکمہ تعلیم، خیبر پختونخوا، پشاور

مضمون: درخواست بمراداریگی بقااجات / تنخواہ والا ڈنسر

جناب عالی!

مؤدبانہ گزارش ہے کہ:

- (۱) میں 18 مارچ 1992ء سے محکمہ تعلیم میں مستقل بنیادوں پر تعینات ہوں۔
 - (۲) 8 اگست 2014ء کو جبکہ میں GHSS گوجرگڑھی میں OT پر کام کر رہا تھا، رات کے وقت فوجی وردی میں بلبوس پاک آری کے اہلکاروں نے ہمارے گھر پر چھاپ مارا اور مجھے گرفتار کر کے نامستطوم مقام پر منتقل کر دیا۔
 - (۳) 22 ماہ اور 8 دن فوج کی حراست میں رہنے کے بعد 16 جون 2016ء مجھے Clear کر کے باعزت طور پر رہا کر دیا۔
 - (۴) ربانی کے اگلے روز یعنی 17 جون 2016ء کو میں نے سکول کی رپورٹ کیا اور پرنسپل صاحب کی خدمت میں تحریری درخواست پیش کرتے ہوئے عرض کی کہ مجھے اپنے پوسٹ پر دوبارہ کام کرنے اور تنخواہ جاری کرنے کے احکامات صادر فرمائیں۔ انہوں نے یہ درخواست اپنی Comments کے ساتھ D.E.O صاحب کو Forward کیا۔
 - (۵) D.E.O صاحب نے فوری کارروائی کرتے ہوئے اس سلسلے میں انکو آری مقرر کی۔
 - (۶) انکو آری آفیسر صاحب نے میرے سکول اور میرے بچنے کا دورہ کیا۔ پرنسپل صاحب، اساتذہ صاحبان اور میرے محلے کے چند افراد کے بیانات قلم بند کئے اور میری گزارشات کو درست قرار دیتے ہوئے D.E.O صاحب کی خدمت میں رپورٹ کیا کہ درخواست گزار واقعی پاک فوج کی حراست میں تھا اور یہ کہ ان کی غیر حاضری اراذات اور تصدیق نہیں تھی۔
 - (۷) پھر انہوں نے Recommend کیا کہ ان کی غیر حاضری کی مدت یکم ستمبر 2014ء تا 16 جون 2016ء Extra Ordinary Leave میں شمار کی جائے، درآں حال یہ کہ میری غیر حاضری میں میرا کوئی قصور نہیں تھا۔ بلکہ میری غیر حاضری میری مجبوری اور بے بسی کی وجہ سے تھی۔
- لہذا تجھی ہوں کہ اس سلسلے میں مجھے On-Duty تصور کر کے تمام تنخواہ اور جملہ Allowances ادا کرنے کے احکامات صادر فرما کر مشکور و ممنون فرمائیں۔

عین خواہش دہنہ ربانی ہوگی

الحاضر

آپ کا تابع فرمان

مفتخر خان C.T

GHSS گوجرگڑھی مردان

11/08/2016

OFFICE OF THE DISTRICT EDUCATION OFFICE (MALE) MARDAN

OFFICE ORDER.

Consequent upon the recommendation of the enquiry officer Mr. Muntazir Khan CT GHSS Gujar Garhi is hereby adjusted against vacant CT post in the same school w.e.f from 17/06/2016 in the interest of public service.

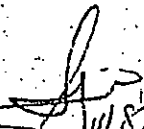
- Note:-
1. The detention period w.e.f 01.09.2014 to 13.06.2015 (286) day on half pay and w.e.f 14.06.2015 to 16.06.2015 (369) days with out pay.
 2. Necessary entry should be made in his service book.

(SIRAJ MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

Endst:No. 5825-27 /PF/Muntazir Khan CT. Dated 11/08/2016.

Copy forwarded for information and necessary action to the:-

1. Principal GHSS Gujar Garhi Mardan.
2. District Accounts Officer Mardan.
3. Teacher Concerned.


DISTRICT EDUCATION OFFICER
(MALE) MARDAN.