

20.05.2019

Appellant in person present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Said Badshah ADO present. Representative of the respondent department submitted reply to the application for interim relief. Adjourn. To come up for arguments on the said application on 30.05.2019 before S.B. Learned counsel for the appellant absent.

for the appellant absent.

Learned counsel

Member

30.05.2019

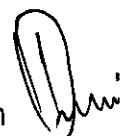
Appellant with counsel and Addl. AG alongwith Said Badshah, ADO for the respondents present.

The representative of respondents No. 1 to 3 has submitted joint parawise comments which are placed on record. It is stated at the bar by learned AAG that the appellant stands removed from service through order dated 12.01.2019, therefore, instant appeal has become infructuous.

On the other hand, learned counsel for the appellant states that the order dated 12.01.2019 has been questioned through departmental appeal which is yet to be decided by the respondents. It is the view of learned counsel that during the pendency of appeal before this Tribunal no adverse order could be passed by the respondents against the appellant. He, therefore, requests for sine-die adjournment of instant appeal so that it is restored for hearing after the decision of departmental appeal or other proceedings against order dated 12.01.2019.

In the circumstances of the case the request of learned counsel appears to be reasonable, therefore, instant appeal is adjourned sine-die which may be restored in accordance with law.

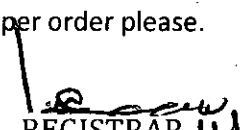


Chairman



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 42/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/1/2019	<p>The appeal of Mr. Muhammad Asif resubmitted today by Mr. Sajid-ur-Rehman 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 11/1/19</p>
2-	25-1-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>22-3-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
07.02.2019		<p>Learned counsel for the appellant argued the case at some length and then requested for adjournment in order to further prepare the brief. He also requested for posting of instant matter before the Touring Bench at Abbottabad.</p> <p>Adjourned to 21.02.2019 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman</p>
	- N J S	

This is an appeal filed by Mr. Muhammad Asif today on 31/12/2018 against the order dated 07.08.2018 against which he preferred/made departmental appeal/ representation on 10.10.2018 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

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

- 1- Annexures of the appeal may be attested.
- 2- Annexures B, C, D and E of the appeal are illegible which may be replaced by legible/better one.
- 3- Annexure-B of the appeal is incomplete which may be completed.
- 4- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2496 /ST,

Dt. 31-12/2018

[Signature]
REGISTRAR 31/12/18
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sajid-ur-Rehman Adv. Haripur.

Respected Sir,

The appeal after removal of objections / deficiencies is re-submitted. for

Yr. *[Signature]*

[Signature]
11/01/2019.

10/10/15

10/10/15

The effect of the removal of the
of the system is to be determined
the effect of the removal of the
of the system is to be determined

10/10/15

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 42 /2018

Muhammad Asif

V/S

Govt. of K.P.K etc

SERVICE APPEAL

I N D E X

S.No	Description of Documents	Annex	Page No
1.	Service appeal affidavit, addresses of parties		1-7
2.	Application for suspension of impugned order with affidavit		8-9
3.	Copy of CNIC	"A"	10
4.	Copy of appointment order as Naib Qasid GHS Kakotri	"B"	11-12
5.	Copy of order as Lab Attendant vide Endst: No. 5546-49 dated 08.07.2017 at High School Machan Da Maira	"C"	13
6.	Copy of service book	"D"	14
7.	Copies of the statements issued by Controller General and Accounts Office Haripur	"E"	15
8	Copy of transfer order No. 8569-61 dated 07.08.2018 to GMS Julian	"F"	16-17
9	Copies of writ petition and order	"G&H"	18-24
10	Copies of departmental appeal and <i>Postal Received</i>	"I&J"	25-26
12	Residential certificate	"K"	27-28
13	Wakalat Nama		29

Dated: 31/12/2018

Appellant

M. Asif

Through Counsel

Sajid-ur-Rehman Khan
Sajid-ur-Rehman Khan
Advocate High Court
At Haripur

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1832

Dated 31-12-2018

Appeal No. 42 /2018

Muhammad Asif son of Muhammad Yousaf resident of Mohallah Degrah Kakotri, Union Council Beer, Tehsil & District Haripur

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, KPK, Peshawar.
2. Director Elementary & Secondary Education, KPK, Peshawar.
3. District Education Officer (Male) Haripur
4. Headmaster Govt. High School Kakotri, Haripur

....Respondents

=====

SERVICE APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED OFFICE ORDER ENDT NO. 8549-61 DATED 07.08.2018 WHEREBY RESPONDENT NO.3 TRANSFERRED AND POSTED AT GMS JULIAN, HAIRPUR WHICH IS BASED ON MALAFIDE AND POLITICAL INFLUENCE.

Filed to-day

 Registrar
 31/12/18

PRAYER :- ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED ORDER ENDT# 8549-61 DATED 07.08.2018 MAY KINDLY BE SET ASIDE AND THE ORDER ENDT # 5546-49 DATED 08.07.2017 MAY KINDLY BE RESTORED WITH ALL BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM FIT AND PROPER MAY ALSO BE GRANTED TO THE APPELLANT.

Re-submitted to -day and filed.


 Registrar
 11/1/19

=====

Respectfully Sheweth:-

Brief facts giving rise to the present appeal are arrayed as under:-

1. That the Appellant is permanent and bonafide resident of Degra Village Kakotri, Union Council Beer District Haripur. Copy of CNIC is annexed as **Annexure "A"**.
2. That the Appellant being permanent resident of Mohalah Degra Kakotri was appointed against the post of Class-IV as Naib Qasid GHS Kakotri. Copy of appointment order is annexed as **Annexure "B"**.
3. That the appellant, after lapse of a period of 7 years was adjusted against the vacant post of Lab Attendant at Govt. High School Machan Da Maira vide Endst: No. 5546-49 dated 08.07.2017. Copy of the order is annexed as **Annexure "C"**.
4. That the cadre of the Appellant i.e. from Naib Qasid to Lab Attendant was also put in the record of the appellant including service book of the appellant. Copy of service book is attached as **Annexure "D"**.
5. That the Appellant is withdrawing the salary against the post of Lab Attendant, copy issued vide Controller General of Accounts Pakistan as well as the District Accounts Office, Haripur. Copies of the statements issued

by Controller General and Accounts Office Haripur are annexed as **Annexure "E"**.

6. That the Respondent No.3 on the dictation of the newly local acted MPA has transferred the appellant from its native village i.e. Kakotri (Machan Da Maira) to GMS Jolian Union Council Tofkian against the post of Naib Qasid vide Endst No. 8569-61 dated 07.08:2018. Copy of order dated 07.08.2018 is annexed as **Annexure "F"**
7. That the appellant filed writ petition before the Honourable Peshawar High Court Bench Abbottabad and the Honourable Court directed to appellant to file the case in proper forum this Honourable Court. Copies of Writ Petition and order are annexed as **Annexure "G&H"**
8. That the appellant also filed before the Respondent No.2 for reversal of impugned transfer order and respondent No.2 rejected the appeal of appellant. Copies of departmental appeal and order are annexed as **Annexure "I&J"**.
9. That the aforesaid situation, the Appellant has come to this Honourable Court, assailing the impugned order of Respondent No.2&3 being unwarranted at law and facts, inter-alia on the following amongst many others:-

GROUND OF SERVICE APPEAL: -

- (a) That the impugned transfer order of respondent No.3 is unlawful authority, arbitrary, malafide, without jurisdiction against the natural justice, hence order dated 07.08.2018 is liable to be set aside.
- (b) That the post of Class-IV as per ESTA Code Rules will remain on local basis and the present Appellant is transferred from its native village Union Council Beer to another Union Council Tofkian which is approximately more than 50 KMs away from his native village. Copy of residential certificate is annexed as **Annexure "K"**.
- (c) That the political influence, as is being exercised in the present case is neither warranted at law nor can be considered in the situation, where the rights of citizen are involved.
- (d) That the Appellant has been subjected to political rivalry. The Appellant has the right to cast vote as per his own choice. Such victimization for not casting the votes to the rival candidate should have been curbed by this Honourable Court.
- (e) That Appellant has brought a fit case for immediate indulgence of this Honourable Court.
- (f) That the other points shall be agitated at the time of arguments with the leave of this Honourable Court.
- (g) That the addresses of the parties hence been given correctly at the point of arguments.

In the light of above stated facts it is humbly prayed that on acceptance of the instant service appeal, the impugned order Endst# 8549-61 dated 07.08.2018 may kindly be set aside and the order Endst # 5546-49 dated 08.07.2017 may kindly be restored with all back benefits. Any other relief which this honourable court deem fit and proper may also be granted to the appellant.

Dated 31/12/2018

Appellant *M. Asad*

Through counsel

M. Asad

**Sajid ur Rehman Khan
Advocate High Court
At Haripur**

VERIFICATION

Verified on oath that the contents of forgoing Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Service Tribunal.

Dated 31/12/2018

Appellant *M. Asad*

ATTESTED



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Muhammad Asif

V/S

Govt. of K.P.K etc

SERVICE APPEAL

AFFIDAVIT

I, Muhammad Asif son of Muhammad Yousaf resident of Mohallah Degrah Kakotri, Union Council Beer, Tehsil & District Haripur do hereby solemnly affirm and declare on oath that the contents of the foregoing service appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Dated: 31/12/2018

M Asif

Deponent
Muhammad Asif



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Muhammad Asif

V/S

Govt. of K.P.K etc

SERVICE APPEAL

ADDRESSES OF THE PARTIES

APPELLANT

Muhammad Asif son of Muhammad Yousaf resident of Mohallah Degrah Kakotri, Union Council Beer, Tehsil & District Haripur

RESPONDENTS

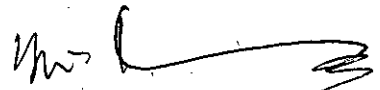
1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, KPK, Peshawar.
2. Director Elementary & Secondary Education, KPK, Peshawar.
3. District Education Officer (Male) Haripur
4. Headmaster Govt. High School Kakotri, Haripur

Dated 31/12/2018

Appellant M

Asif

Through counsel



**Sajid ur Rehman Khan
Advocate High Court
At Haripur**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

CM _____/2018

IN

Service Appeal # _____/2018

Muhammad Asif

V/S

Govt. of K.P.K etc

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF IMPUGNED
TRANSFER ORDER 8549-61 DATED 07.08.2018 MAY
KINDLY BE SET ASIDE TILL THE FINAL DISPOSAL OF
SERVICE APPEAL**

Respectfully shewth:

1. That service appeal is being filed along with this application and this application may be treated as part and parcel of the service appeal
2. That the Respondent No.3 has illegally and unlawfully has transfer from native village Kakotri to GMS Julian Village Council Jualan on political basis.
3. That if the impugned transfer order not suspended then the appellant will suffer irreparable loss and present service appeal will become infructuous.
4. That the balance of convenience also lies in favour of appellant.

Therefore it is humbly prayed that the impugned transfer order No. 8549-61 dated 07.08.2018 may kindly be set aside till the final disposal of main service appeal

Dated: 31/12/2018

Appellant *M. Asif*

Through Counsels

Sajid
Sajid-ur-Rehman Khan
Advocate High Court
At Haripur

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

CM _____/2018

IN

Service Appeal # _____/2018

Muhammad Asif

V/S

Govt. of K.P.K etc

APPLICATION

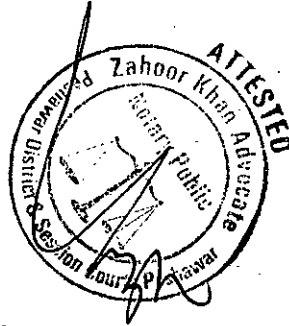
AFFIDAVIT

I, Muhammad Asif son of Muhammad Yousaf resident of Mohallah Degrah Kakotri, Union Council Beer, Tehsil & District Haripur do hereby solemnly affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Dated: 31/12/2018

**Deponent
Muhammad Asif**

M Asif



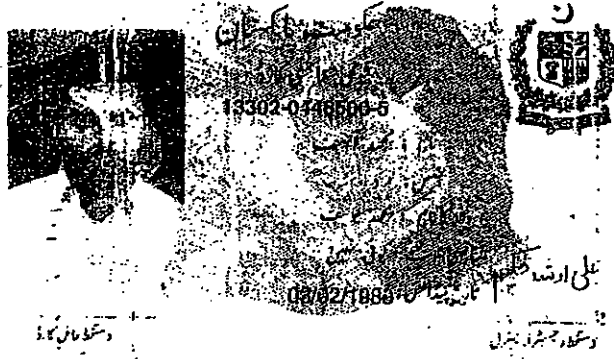
ANNEXURE "A"



(10)

Annex "A"

(11)



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Sajid-ur-Rehman Khattak
ADVOCATE
M.A., LL.B (HONS) Sh & Law (UJ) U
Dist. Courts Haripur

Ms. Samirah J/c
 Please prepare the
 necessary documents by 10/4/10

(11)

Office of the Executive District Officer
 Elementary & Secondary Education

PH No. 0995-610178, 610268

Appointment Order

Consequent upon the selection District Selection Committee in its meeting recommendation of sub-committee, the following local candidates of Union LADERMANG, KALINJAR, BEER, BAITGALI, NARA AMAZAI, KUNDI, SIRIKOT, KHAIRBARA, KOTEHRA AND QAZIPUR. (PF-52) are hereby appointed as Class-IV in BPS-01 along with usual allowances admissible to the Govt. Servants in the Schools mentioned against each w.e.f the date of their taking over charge in the interest of service.

S.No	Name	Father's Name	Village	Post Applied for	School	Remarks
1	Ahmed Dilshad	Zardad Khan	Kalinjar	Lab Att:	GHS Kalinjar	Against Vacant
2	Shamraiz Khan	Muhammad Ashraf	Chaintry	Water Carrier	GHS Chaintry	Against Vacant
3	Sajid Ali	Rashid Ali	Jhamra	Sweeper	GHS Jhamrah	Against Vacant
4	Zakir Shah	Sarwar Khan	Billah	Chowkidar	GHSS Sirikot	Against Vacant
5	Nazakat Shah	Abdul Malik	Sirikot	Sweeper	GHSS Sirikot	Against Vacant
6	Sanwal Khan	Muhammad Aslam	Timbr	Chowkidar	GHS Machanda Maira	Against Vacant
7	Sadam Hussain	Shabbir Ahmed	Tahala	Lab Att:	GHS Machanda Maira	Against Vacant
8	Naveed Ahmed	Sher ur Rehman	Tahala	Water Carrier	GHS Machanda Maira	Against Vacant
9	Sadaqat Ali	Abdul Malik	Salamkhand	Chowkidar	GHS Salamkhand	Against Vacant Retired
10	Qamar Zaman	Yaqoob Khan	Mian Dhari	Behshti	GIS Dheri Nagarchian	Retired
(11)	Muhammad Waseem	Gul Muhammad	Kakotri	Chowkidar	GHSS Kakotri	Against Vacant
(12)	Muhammad Asif	Muhammad Yousaf	Kakotri	Naib Qasid	GHS Kakotri	Against Vacant
13	Muhammad Saleem	Muhammad Miskeen	Beer	Lab Att:	GHSS Beer	Retired
14	Fida Muhammad	Farid Muhammad	Beer	Lab Att:	GHSS Beer	Retired
15	Waris Shah	Muzaffar Shah	Umer Khana	Sweeper	GMS Umer Khana	Against Vacant Retired
16	Abdul Hakeem	Muhammad Ishaq	Kachi	Naib Qasid	GMS Kachi	Against Vacant
17	Tariq Hussain	Khawaj Muhammad	Brug	Naib Qasid	GMS Brug	Against Vacant
18	Babar Khan	Jehanzaib	Swar Maira	Naib Qasid	GMS Swar Maira	Against Vacant
19	Masood Ahmed	Rasool Khan	Kandhori	Naib Qasid	GMS Spaha	Against Vacant
20	Muhammad Anwar	Muhammad Akbar	Gorraki	Sweeper	GMS Gorraki	Against Vacant

Signature and Stamp of the District Officer, Elementary & Secondary Education, District Kalan.

11-A

21	Noor Nabi Shah	Hazrat Shah	Kheri	Water Carrier	GMS Khairi	Against Vacant Post
22	Lal Shahzada	Muhammad Hassan	Kaneer	Sweeper	GMS Kaneer	Against Vacant Post
23	Daud Khan	Dolahat Khan	Thali Kot	Naib Qasid	GMS ThaliKot	Against Vacant Post
24	Juanid Khan	Ahmed Zamun	Kaneerari	Naib Qasid	GMS Kanerri	Against Vacant Post
25	Faqiri Zaman	Taj Muhammad	Khair Bara	Chowkidar	GPS Khair Bara	Deceased Son
26	Riaz Muhammad	Ghulam Din	Gallai Amazai	Chowkidar	GPS Galli No.1	Retired Son
27	Gul Bacha	Aziz ur Rehman	Brug	Chowkidar	GPS Burg	Against Vacant Post
28	Zahir Shah	Chanan Shah	Pit Bandi	Chowkidar	GPS Pat Bandi	Against Vacant Post Retired Son
29	Saqib Shah	Nazir Ahmed	Ghari Sathna	Chowkidar	GPS Ghuri Sathana	Against Vacant Post Deceased Son
30	Nashat Khan	Muhammad Khan	New Khabal	Chowkidar	GPS Khabal	Against Vacant Post
31	Shahzad Ahmed Khan	Muhammad Suleman	Anora	Chowkidar	GPS Anora	Against Vacant Post
32	Ghulam Mustafa	Wali Gul	Chajakka	Chowkidar	GPS Chajaka	Against Vacant Post Retited Son
33	Khan Afsar	Shah Zaman	Swabi Maira	Chowkidar	GPS Swabi Mera	Against Vacant Post
34	Taj Ur Rehman	Khan Zaman	Kalinjar	Chowkidar	GPS Kalinjer No 3	Against Vacant Post Deceased Son
35	Wali Dad Khan	Ali Zaman	Kalinjar	Chowkidar	GPS Dana Kalinjar	Against Vacant Post
36	Mehar Khan	Akhbar Hussain	Tooi	Chowkidar	GPS Tooi	Against Vacant Post Deceased Son
37	Bular Zaman	Haider Zaman	Parhati	Chowkidar	GPS Parhati	Against Vacant Post
38	Rawaiz Ahmed	Pervaiz Khan	Kandhori	Chowkidar	GPS Soha	Against Vacant Post Deceased Son
39	Sagheer Ahmed	Naseer Ahmed	Kalupar	Chowkidar	GPS Kandhori	Against Vacant Post Retired Son
40	Abdul Ghafoor	Malik Aman	Beer	Chowkidar	GPS M D Mera	Against Vacant Post
41	Adnan Khan	Muhamamd Akram	Tahala	Chowkidar	GPS Balhar	Against Vacant Post
42	Muhammad Shafi	Muhammad Zaman	Shingri Amazi	Chowkidar	GPS Shingri	Against Vacant Post
43	Muhammad Umair Khan	Aalamgir Khan	Garhi Karam Din	Chowkidar	GPS Garhi Karam Dad	Against Vacant Post
44	Malik Rafiqat	Wali Muhammad	Latif Abad	Chowkidar	GPS Latif Abad	Against Vacant Post
45	Wahid Iqbal	Khan Bahadar	Ghazi	Chowkidar	GPS Ghazi	Against Vacant Post

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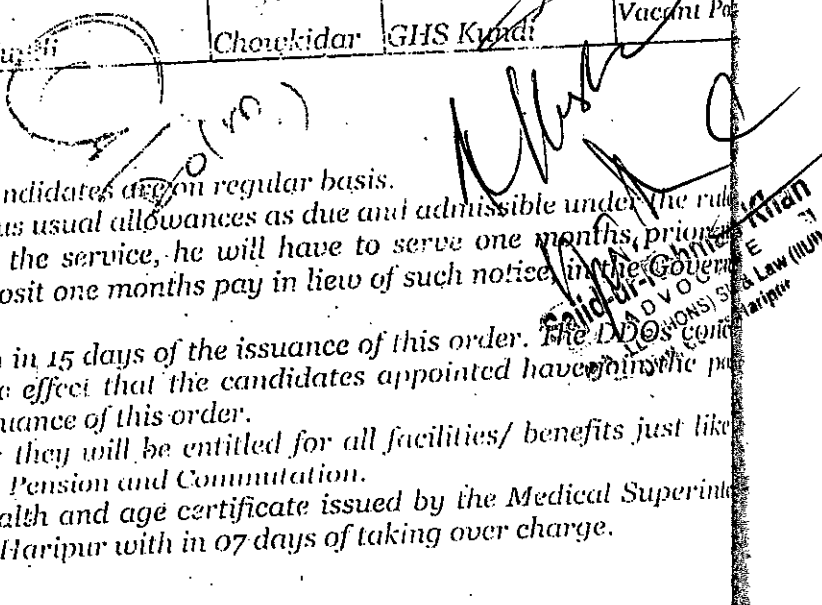
Sajid-ur-Rahman
ADVOCATE
LLB (HONS) Sh & Law (HLL)
Courts Haripur

11-B

5	Aziz Saeed	Saeed Ahmed	Ghazi	Chowkidar	GPS Khaloo	Against Vacant Post
7	Muhammad Jamshad	Mehboob Khan	Boarwsu	Chowkidar	GPS Barwassa	Against Vacant Post Retired Son
18	Yawar Khan	Faiz Muhammad	Jummu	Chowkidar	GPS Jammu	Against Vacant Post
19	Riasat Shah	Ghareeb Shah	Sheikh Chhor	Chowkidar	GPS Sheikh Chor	Against Vacant Post
50	Tanveer Ali Awan	Muhammad Sadiq Awan	Sokra	Chowkidar	GPS Sokra	Against Vacant Post Deceased Son
51	Imran Khan	Sultan Afsar	Pephalya	Chowkidar	GPS Pipliala	Against Vacant Post
52	Ijaz Khan	Haidar Zaman	Umer Khana	Chowkidar	GPS Umer Khana	Against Vacant Post
53	Muhammad Amir	Muhammad Ilyas	Nandi Kiyari	Chowkidar	GPS Nandi Kiari	Against Vacant Post Retired Son
54	Syed Safdar Shah	Faqir Shah	Boketer	Chowkidar	GPS Boketer	Against Vacant Post
55	Zahoor Elahi	Mehboob Elahi	Gallai	Chowkidar	GPS Phalwari	Against Vacant Post
56	Asghar Shah	Aksar Shah	Anarga	Chowkidar	GPS Anargah	Against Vacant Post
57	Muhammad Usman	Muhammad Javed	Bhail	Chowkidar	GPS Bail	Against Vacant Post
58	Fazai e Raziq	Muhammad Mahroof	Nare Amazai	Chowkidar	GPS Chanjlo	Against Vacant Post
59	Hamid Khan	Muhammad Dastan	Parba	Chowkidar	GPS Parba	Against Vacant Post
60	Farzand Hussain Shah	Ibrar Hussain Shah	Gowari	Chowkidar	GPS Gawari	Against Vacant Post Deceased Son
61	Sajjad Ali	Muhammad Sabir	Khoi Dara	Chowkidar	GPS Morian Terchiti	Against Vacant Post Retired Son
62	Babar Shahzad	Mumtaz Ali	Khoi Dara	Chowkidar	GPS Khoi Dara	Against Vacant Post
63	Asif Nawaz	Shah Nawaz	Maira Khurd	Chowkidar	GPS Maira Khairo	Against Vacant Post
64	Shahzad Khan	Badri Zaman	Kahaka	Chowkidar	GPS Kapla	Against Vacant Post
65	Darul Islam	Chaman Sher	Kurshi	Chowkidar	GPS Kurshi	Against Vacant Post

Terms & Conditions

- The appointments of the above candidates are on regular basis.
- They will get Salary in BPS-01 plus usual allowances as due and admissible under the rules.
- if any one want to resign form the service, he will have to serve one months prior notice failing which he will have to deposit one months pay in lieu of such notice in the Government treasury.
- They should join their posts with in 15 days of the issuance of this order. The DDOs should furnish certificates to the effect that the candidates appointed have joined the posts otherwise after 15 days of the issuance of this order.
- Their services will be regular & they will be entitled for all facilities/ benefits just like regular Govt. Employees, except Pension and Commutation.
- They will bound to produce Health and age certificate issued by the Medical Superintendent District Head Quarter Hospital-Haripur with in 07 days of taking over charge.


 Official stamp and signatures of the District Officer, Haripur. The stamp includes the text "District Officer, Haripur" and "D.O. Haripur". There are several handwritten signatures and initials over the stamp.

11-9

7. Charge report should be submitted to all concerned in duplicate.
8. The Age limit is 18 years to 40 years and no under age / over age candidate should be allowed to take charge with out relaxation by the authority concerned.
9. No. TA/DA is allowed to any one.

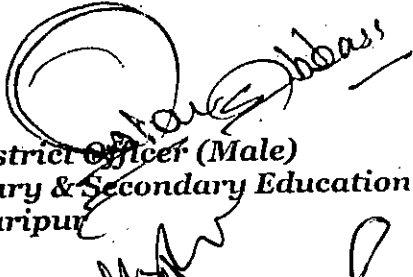
-----sd/-----
Executive District Officer
Elementary & Secondary Education
Haripur


Endst: No. 4820-93 /

Dated: 09-04 - /2010

Cc:

1. The District Coordination Officer Haripur.
2. The Senior District Accounts Officer Haripur.
3. The District Officer Male E&SE for account branch.
4. The DDO (M) Elementary Education Haripur.
5. Principals/s/ Headmistress/ Head Teachers concerned.
6. Candidates concerned.
7. Office record file.


District Officer (Male)
Elementary & Secondary Education
Haripur


Sajid-ur-Rehman Khan
ADVOCATE
M.A., LL.B (HONS) Sh & Law (Huj)
Dist. Courts Haripur



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

12

Transfer / adjustment.

0995/610178, 610268.

Consequent upon the approval by the competent authority that Mr. Muhammad Asif N/Qasid Govt. High School, Darwesh is hereby transferred at Govt. High School, M.D. Maira against the vacant post of Lab Attendant on his own pay & grade in the interest of public service with immediate effect.

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

Sd/-
District Education Officer
(Male) Haripur.

Dated Haripur the 8/7 /2017.

Endst:No. 5546-49 /C/IV /G.Br./

Copy to :-

- 1-The District A/Cs Officer Haripur.
- 2-3)The HM GHS, Darwesh & M.D.Maira.
- 4-O.O. file.

By: District Education Officer
(Male) Haripur

Sajid-ur-Rehman Khan
ADVOCATE
MA. LLB (HONS) Shi & Law (100)
Dist. Courts Haripur

19	Masood Ahmed	Raseool Khan	Kandhori	Naib Qasid	GMS Soha	Vac
20	Muhammad Anwar	Muhammad Akbar	Gorraki	Sweeper	GMS Guraki	Vac

Dist. Govt. NWFP-Provincial
District Accounts Office Haripur
Monthly Salary Statement (July-2018)

(13) 7 (12)
[Circular Stamp]

Personal Information of Mr MUHAMMAD ASIF d/w/s of MUHAMMAD YOUSAF

Personnel Number: 00514160 CNIC: 1330204485005 NTN:
Date of Birth: 03.02.1980 Entry into Govt. Service: 12.04.2010 Length of Service: 08 Years 03 Months 021 Days

Employment Category: Active Permanent

Designation: LABORATORY ATTENDANT 80002254-DISTRICT GOVERNMENT KHYBE

DDO Code: HR6216-GHS MACHAN- DE-MAIRA

Payroll Section: 002 GPF Section: 001 Cash Center:

GPF A/C No: 514160 Interest Applied: Yes GPF Balance: 28,199.00

Vendor Number: - Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 03 Pay Stage: 5

Wage type		Amount	Wage type		Amount
0001	Basic Pay	11,560.00	1000	House Rent Allowance	1,413.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
1968	Incentive Allowance 20%	1,000.00	2148	15% Adhoc Relief All-2013	255.00
2199	Adhoc Relief Allow @10%	183.00	2211	Adhoc Relief All 2016 10%	934.00
2224	Adhoc Relief All 2017 10%	1,156.00	2247	Adhoc Relief All 2018 10%	1,156.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription - Rs 770	-770.00	3501	Benevolent Fund	-300.00
3990	Emp.Edu. Fund KPK	-60.00	4004	R. Benefits & Death Comp:	-451.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till July-2018: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 20,942.00 Deductions: (Rs.): -1,581.00 Net Pay: (Rs.): 19,361.00

Payee Name: MUHAMMAD ASIF
Account Number: CA 1002135
Bank Details: MCB BANK LIMITED, 240585 STAR BRANCH STAR BRANCH. ABBOTABAD

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: HARIPUR Domicile: - Housing Status: No Official
Temp. Address: Email:

[Signature]
Sajid-ur-Rehman Khan
ADVOCATE
MA LLB (HONS) Sh & Law (Pvt)
Dist. Courts Haripur

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

Name: Mr MUHAMMAD ASIF 13302-0448500-5

Race: "AWAN"

Residence: Village DEAGHRA P.O. KAKOTRI Distt: HARI PUR.


Father's name and residence: MUHAMMAD JOUSAF


Date of birth by Christian era as nearly as can be ascertained: 03-02-1980


Exact height by measurement: 5-7"


Personal marks for identification: NIL

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: 

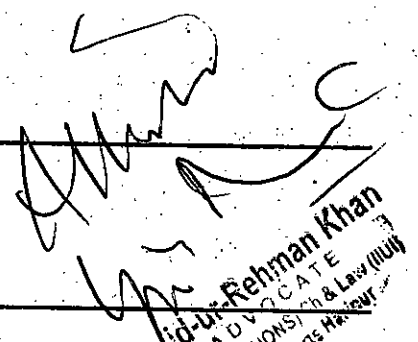
Ring Finger: 

Middle Finger: 


Fore Finger: 

Thumb: 

Signature of Government Servant: M. ASIF


Said-ur-Rehman Khan
ADVOCATE
M.A. LL.B (HONS) in Law (Muz)
Distt. Courts Haripur

Signature and designation of the Head of the office, or other Attesting Officer.


PRINCIPAL
Govt: Higher Secondary
School, Kakotri (Haripur)

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	
N/QASD								
		BPS 01(2970-90-5670)						
C.H.S. KAKOTRI	Temp		Rs: 2970/			12 ⁰⁴ / ₂₀₁₀	M. Asif	
			Rs: 4800/pm			06 ⁰⁶ / ₂₀₁₃	M. Asif	
			Rs: 4800/pm			01 ¹² / ₁₃	M. Asif	
			Rs: 9950/pm			01 ¹² / ₁₄	M. Asif	
C.H.S No 2 Haridan NR	Temp		Rs: 5100/pm			01-12-2014	M. Asif	
			Rs: 5100/pm			09 ⁰⁶ / ₁₅	M. Asif	
		BPS-01(6210-195-12060)						
			Rs: 6600/pm			01 ¹² / ₁₅	M. Asif	
		BPS-(4800-150-9300)						
C.H.S Kakotri			Rs 4800/pm			06 ⁰⁶ / ₁₃	M. Asif	
			Rs 4800/pm			01 ¹² / ₁₃	M. Asif	
"			Rs 4950/pm			01 ¹² / ₁₄	M. Asif	
			Rs 5100/pm			01 ¹² / ₂₀₁₄	M. Asif	
C.H.S No 2/19			Rs 5100/pm			9-6-15	M. Asif	
		BPS-1(6210-195-12060)						
			Rs 6600/pm			01 ¹² / ₁₅	M. Asif	
Rec'd Enters due to upgradation of scale BPS-01 to BPS-3 vide Govt No FD/501/F/20/205 dt 30-6-2015								
		BPS-3 (6535-260-14335)						
C.H.S No 2 NR 67957860			Rs 7055/pm			7 ⁰⁷ / ₂₀₁₅	M. Asif	
			Rs 7315/pm			01 ¹² / ₁₅	M. Asif	

43-B

9 Name and Designation of head of the office attesting officer of columns 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer.	15 Reference to any recorded punishment or cessure, or reward or praise of the Government Servent
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debttable to another Government		
				Period	Government to Which debttable		
<i>[Signature]</i> PRINCIPAL Govt: Higher Secondary School, Kakotri (Haripur)	16/9/2010	Dismissed from service w.e.f. 17-9-2010	<i>[Signature]</i>			<i>[Signature]</i>	appointed/assigned vide No 4820-93 dated 9.4.10 EDO (EYSE) Haripur
<i>[Signature]</i>	30/6/14	one School Adm	<i>[Signature]</i>			<i>[Signature]</i>	PRINCIPAL Govt: Higher Secondary School, Kakotri (Haripur)
<i>[Signature]</i>	30/11/14	A/mo	<i>[Signature]</i>			<i>[Signature]</i>	5.50 31015
<i>[Signature]</i>	30/6/15	Scale Revised	<i>[Signature]</i>			<i>[Signature]</i>	9.50 11/1/2015 & 9.50 12/1/2015
<i>[Signature]</i>	06/6/13	Re-Instal & Serv	<i>[Signature]</i>			<i>[Signature]</i>	E. 30/6/2010
<i>[Signature]</i>	30/6/14	one S. Ad Insruc	<i>[Signature]</i>			<i>[Signature]</i>	06/11/14
<i>[Signature]</i>	30/11/14	A/Im	<i>[Signature]</i>			<i>[Signature]</i>	Dismissed from service under RSO (2000) w.e.f. 17-9-2010 vide EDO R.4 SE Haripur
<i>[Signature]</i>	30/6/15	Scale Revised PB-3	<i>[Signature]</i>			<i>[Signature]</i>	Re-instal No. 7257-58 dated 28-4-2011 ELL
<i>[Signature]</i>			<i>[Signature]</i>			<i>[Signature]</i>	one School Adm by Govt 12/1/2015 & 9.50/2015
<i>[Signature]</i>			<i>[Signature]</i>			<i>[Signature]</i>	30/6/14
<i>[Signature]</i>			<i>[Signature]</i>			<i>[Signature]</i>	one S. Ad 12/1/2015
<i>[Signature]</i>	30/11/15	A/Im	<i>[Signature]</i>			<i>[Signature]</i>	Re-Instal in Service vid Govt 12/1/2015 vide No 4812-16 EDO A/2015 vide EDO (M) HR No 426-30 d 17/1/15
<i>[Signature]</i>	30/6/16	S. Ad	<i>[Signature]</i>			<i>[Signature]</i>	Re-instal on 6-6-2013 order AL

District Accounts Officer
HARIPUR

Muhammad Rehmeh Khan
Advocate
Haripur

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitble to another Government		
Signature and Designation of the head og the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to Which debitble	Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or cesure, or reward or praise of the Government Servent
<i>[Signature]</i> PRINCIPAL GHS No 2 Haripur	30 ¹¹ / ₁₆	A/m	<i>[Signature]</i> PRINCIPAL GHS No 2			<i>[Signature]</i> C 558 10/7/17	
<i>[Signature]</i> PRINCIPAL GHS No 2 Haripur	18 ³ / ₂₀₁₇	Transfer to GHS Dows	<i>[Signature]</i> PRINCIPAL GHS No 2			<i>[Signature]</i> Office of Dy na 1/6/21 et 3-9/15	
<i>[Signature]</i> Headmaster Govt: High School Darwash (Haripur)	30 ⁰⁶ / ₁₇	Scale Revised	<i>[Signature]</i> Headmaster Govt: High School Darwash (Haripur)			<i>[Signature]</i> Officer HARIPUR	
<i>[Signature]</i> Govt: High School Darwash	11 ⁰⁷ / ₂₀₁₇	Transfer to GHS M.P. Mawa Haripur	<i>[Signature]</i> Govt: High School M.P. Mawa			<i>[Signature]</i> C 516 8/11/16 Office of Dy na 6/6/13 to 31/5/15 Vice Prae. Dist NO. 3624-26 D.O. No. 7/9/16, DCO Haripur	
<i>[Signature]</i> Headmaster GHS. M-DA Mawa Haripur		A/m	<i>[Signature]</i> GHS M-DA Mawa			<i>[Signature]</i> 13/11/16	
			<i>[Signature]</i> Dist. Accounts Officer HARIPUR			<i>[Signature]</i> Solved with a work 9/6 to 18/17 off Har	
	16 ⁰⁸ / ₁₈	Transfer to GHS Jouhar HR	<i>[Signature]</i> Vide Enrol # 8569-61 Date 07 D.E-3 Ms HR	08 18		<i>[Signature]</i> Sajid-U-Rehman Khan ADVOCATE D.A. & L.B (HANS) SN & Law (DUI) Dist. Court, Haripur	
			<i>[Signature]</i> Head Master Govt. High School Machan Da Maira Haripur				

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Period	Government to which debitable	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
					Suspended from Service w.e. 12-04-2017 To 10-05-2017 vide DEO(M) HR Endst No. 1170-72 Dated 13-04-2017.		
						H.M. Govt: High School Darwest (Haripur)	
					With Approval vide this Office order Endst No. 1170-72 dated 13-4-2017, vide D.O. (M) HR Endst No. 3646 Dated 11-5-2017.		
						H.M. Govt: High School Darwest (Haripur)	
					Service verified from 19 ⁸³ 11-07-2017 from the App. Roll & other records.		
						H.M. Govt: High School Darwest (Haripur)	
					3 241 14/8/17		
					Pay active w.e. 1-8-17 in VHR 6216 and pay adjusted w.e. 1-7-17 to 31-7-17.		
		Service Verified w.e. from 12-07-2017 to 16-08-2018.					
			Head Master Govt. High School Machan Da Nairo Haripur			District Accounts Officer HARIPUR	

DDO'S OPEN AND FILLED POSTS SUMMARY REPORT

15

Communication Failure: RFC destination SALV_WD_EXPORT_PDF does not exist. Display Help

Department Selection



Controller General of Accounts, Pakistan
Islamabad
DDO'S OPEN & FILLED POSTS

Government: IN DDO CODE: HR6216

Details:

View:

OPEN/FILLED	POSITION	Personnel No	Employee Name	BPS	DESCRIPTION	Job Description
FILLED	80176650	247250	FARHAD KHAN	16	SENIOR CERTIFIED TEACHER	SENIOR CERTIFIED TEACHER
FILLED	80176701	247244	JEHAN ZEB	18	Senior English Teacher	SENIOR ENGLISH TEACHER
FILLED	80176702	247508	QARI MUHAMMAD MURSLEEN	12	QARI	QARI
FILLED	80176703	247551	TAHIR ZAMAN	15	DRAWING MASTER	DRAWING MASTER
FILLED	80176704	247556	ABDUL MASHOOD	02	NAIB QASID	NAIB QASID
FILLED	80176705	249862	MUHAMMAD HALEEM	16	SENIOR PHYSICAL EDUCATION TEACHER	SENIOR PHYSICAL EDUCATION TEACHER
FILLED	80176706	868188	MUHAMMAD SHAKEEL	15	ARABIC TEACHER	ARABIC TEACHER
FILLED	80176707	660412	SAJID KHAN	16	SENIOR ENGLISH TEACHER	SENIOR ENGLISH TEACHER
FILLED	80176708	251504	JAVED AHMED	17	HEAD MASTER	PRINCIPAL
FILLED	80176709	254187	MUHAMMAD ISMAIL	15	CERTIFICATED TEACHER	CERTIFICATED TEACHER
FILLED	80176710	253267	MIR AFZAL KHAN	16	SENIOR ENGLISH TEACHER	SENIOR ENGLISH TEACHER
FILLED	80176712	868202	HABIB JAVED	11	JUNIOR CLERK	JUNIOR CLERK
FILLED	80176713	508374	MUHAMMAD ISMAIL TANOLI	01	CHOWKIDAR	CHOWKIDAR
FILLED	80176714	510812	NAVEED AHMED	01	BEHISHTI	BEHISHTI
FILLED	80176715	514160	MUHAMMAD ASIF	01	LABORATORY ATTENDANT	LABORATORY ATTENDANT
FILLED	80426600	758076	ASAD AYUB	16	SENIOR ENGLISH TEACHER	SENIOR ENGLISH TEACHER
FILLED	60486783	253712	SYAD AHMAD RAZA	15	Certificated Teacher	CERTIFICATED TEACHER
OPEN	80176649			15	THEOLOGY TEACHER	THEOLOGY TEACHER
OPEN	80176711	251710		15	CERTIFICATED TEACHER	CERTIFICATED TEACHER

Handwritten signature

Sajid-ur-Rehman Khan
ADVOCATE
M.A., LLB (HONS) Sh & Law (Huj)
Dist. Courts Haripur



17

Office of the District Education Officer (Male) Haripur

PH No: 0995-612178, 610268

Order

As approved by competent authority, Mr Muhammad Asif N/Q working wrongly against the post of L/Attand: GHS M.D. Maria Haripur is hereby adjusted against his original post of N/Q at GMS Joulia, on his own pay and grade in the interest of public service with immediate effect.

1. No TA/DA or TG is allowed.
2. Charge report should be submitted to all concerned

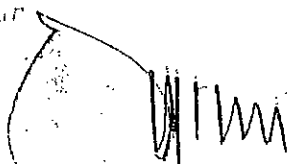
Endst: No. 8569-61 /

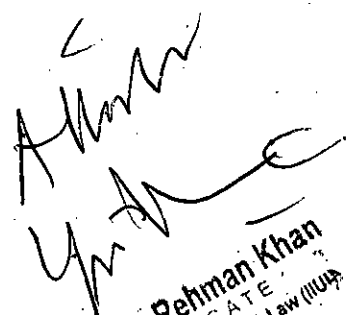
Sd/-----
District Education Officer (Male)
Haripur

Dated: 07 / 08 / 2018.

Cc

1. Senior District Accounts Officer Haripur.
2. Headmaster GHS M.D Maria Haripur
3. Headmaster GMS Joulia Haripur
4. Office copy.


Asst. District Education Office (M)
Haripur


Sajid-ur-Rehman Khan
ADVOCATE
MA., LLB (HONS) Sh & Law (HQA)
Distt. Courts Haripur

19	Masood Ahmed	Rasool Khan	Kandhori	Naib Qasid	GMS Soha	Vacant
20	Muhammad Amir	Muhammad Akbar	Goraki	Sugeper	GMS Guraki	Against Vacant

Annexure - (9)

(1)

(18)

BEFORE THE HONOURABLE PESHAWAR HIGH COURT
ABBOTTABAD BENCH

W.P No. 1012 /2018

Muhammad Asif son of Muhammad Yousaf resident of Mohallah Degrah Kakotri, Union Council Beer, Tehsil & District Haripur

..... **Petitioner**

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, KPK, Peshawar.
2. Director Elementary & Secondary Education, KPK, Peshawar.
3. District Education Officer (Male) Haripur
Headmaster Govt. High School Kakotri, Haripur

..... **Respondents**

Certified to be True Copy
 01 OCT 2018
 Pect. 31 - High Court, Bench
 Authorized Under Seal & Evid Ordns

20-4-18
 1578/18

WRIT PETITION UNDER ARTICLE 199 OF CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 FOR DECLARATION TO THE EFFECT THAT THE PETITIONER LOCAL AND PERMANENT RESIDENT OF VILLAGE DEGRA, KAKOTRI, UNION COUNCIL BEER, TEHSIL & DISTRICT HARIPUR WAS APPOINTED AGAINST THE POST OF NAIB QASID EARLY IN 2010 AND LATER ON THE PETITIONER WAS TRANSFERRED TO GOVT. HIGH SCHOOL M.D MAIRA AGAINST THE VACANT POST OF LAB ATTENDANT AFTER APPROVAL OF THE COMPETENT AUTHORITY VIDE ENDST: 5546-49 DATED 08.07.2017 AND THE PETITIONER IS ALSO WITHDRAWING HIS SALARY AGAINST THE POST OF LAB ATTENDANT, WHEREAS IMPUGNED OFFICE ORDER ENDT NO. 8549-61 DATED 07.08.2018 IS ILLEGAL, UNLAWFUL WITHOUT JURISDICTION, AGAINST THE LAW, POLICY AND LAID DOWN AS THE ESTA CODE AND BASED UPON THE POLITICAL INFLUENCE HENCE LIABLE TO BE SET ASIDE.

FILED TODAY
 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH

1578

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PRAYER:- ON ACCEPTANCE OF THE INSTANT WRIT PETITION, THE IMPUGNED ORDER ENDST# 8549-61 DATED 07.08.2018 MAY KINDLY BE SET ASIDE AND THE ORDER ENDST # 5546-49 DATED 08.07.2017 MAY KINDLY BE RESTORED WITH ALL BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM FIT AND PROPER MAY ALSO BE GRANTED TO THE PETITIONER.

=====
Respectfully Sheweth:

The brief facts of the case are as under:-

FACTS:

1. That the petitioner is permanent and bonafide resident of Degra Village Kakotri, Union Council Beer District Haripur. Copy of CNIC is annexed as **Annexure "A"**.

2. That the petitioner being permanent resident of Mohalah Degra Kakotri was appointed against the post of Class-IV as Naib Qasid GHS Kakotri. Copy of appointment order is annexed as **Annexure "B"**.

That the petitioner, after lapse of a period of 7 years was adjusted against the vacant post of Lab Attendant at Govt. High School Machan Da Maira vide Endst: No. 5546-49 dated 08.07.2017. Copy of the order is annexed as **Annexure "C"**.

Certified to be True Copy
EXAMINER
01 OCT 2018
Peshawar High Court /td. Bench
Authorized Under Sec: 3 Evid Ordns:

FILED TODAY

**ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH**

[Handwritten Signature]

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4. That the cadre of the petitioner i.e. from Naib Qasid to Lab Attendant was also put in the record of the petitioner including service book of the petitioner. Copy of service book is attached as **Annexure "D"**.
5. That the petitioner is withdrawing the salary against the post of Lab Attendant, copy issued vide Controller General of Accounts Pakistan as well as the District Accounts Office, Haripur. Copies of the statements issued by Controller General and Accounts Office Haripur are annexed as **Annexure "E"**.
6. That the Respondent No.3 on the dictation of the newly local acted MPA has transferred the petitioner from its native village i.e. Kakotri (Machan Da Maira) to GMS Jolian Union Council Tofkian against the post of Naib Qasid vide Endst No. 8569-61 dated 07.08.2018. Copy of order dated 07.08.2018 is annexed as **Annexure "F"**
7. That feeling aggrieved of the aforesaid situation, the petitioner has come to this Honourable Court, assailing the impugned order of respondent No.3 being unwarranted at law and facts, inter-alia on the following amongst many others:-

GROUND: -

- (a) That the post of Class-IV as per ESTA Code Rules will remain on local basis and the present petitioner is transferred from its native village Union Council Beer to another Union Council Tofkian which is approximately

Certified to be True Copy
EXAMINER
01 OCT 2018
Peshawar High Court Atd. Bench
Authorized Under Sec 15 Evid Q

ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

11/10/18

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more than 50 KMs away from his native village. Copy of residential certificate is annexed as Annexure "G".

- (b) That the political influence, as is being exercised in the present case is neither warranted at law nor can be considered in the situation, where the rights of citizen are involved.
- (c) That the petitioner has been subjected to political rivalry. The petitioner has the right to cast vote as per his own choice. Such victimization for not casting the votes to the rival candidate should have been curbed by this Honourable Court.
- (d) That petitioner has brought a fit case for immediate indulgence of this Honourable Court.
- (e) That no other efficacious, speedy or adequate remedy is available to the petitioner except the instant constitutional petition.
- (f) That valuable right of the petitioner is involved in the matter.
- (g) That the other points shall be agitated at the time of arguments with the leave of this Honourable Court.

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

Certified to be True Copy
EXAMINER
01 OCT 2018
Peshawar High Court Atd. Bench
Authorized Under Sec. 75 Evid Ordns.

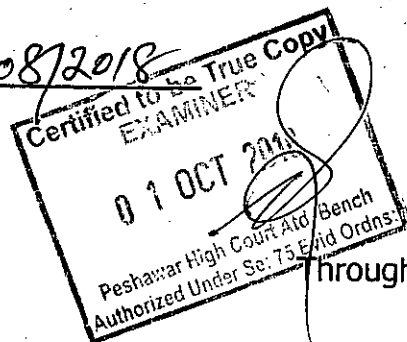
- (5)
(22)
- (h) That the notices had been sent to all respondents along with copy of writ petition. Copies of notices alongwith receipt of GPO are annexed as **Annexure "H&I"**.
- (i) That court fee stamps worth Rs. 500/- is annexed with the petition.

Under the circumstances, it is respectfully prayed that on acceptance of the instant writ petition, the impugned order Endst# 8549-61 dated 07.08.2018 may kindly be set aside and the order Endst # 5546-49 dated 08.07.2017 may kindly be restored with all back benefits. Any other relief which this honourable court deem fit and proper may also be granted to the petitioner.

INTERIM RELIEF

It is prayed that the impugned order Endst No. 8569-61 dated 07.08.2018 may kindly be suspended till the final disposal of main Writ petition

Dated: 20/08/2018



M. Asif
PETITIONER

Sajid-ur-Rehman Khan
Sajid-ur-Rehman Khan
Advocate High Court,
At Haripur

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
9/2/18

VERIFICATION

Verified that the contents of this writ petition are true and correct to the best of my knowledge as per record made available to me and that nothing has been concealed therein.

Dated: 20/08/2018

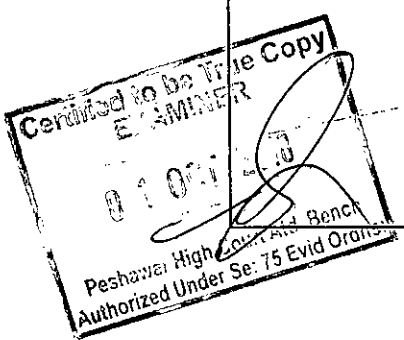
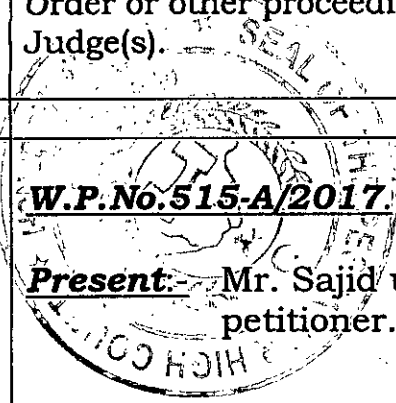
M. Asif
PETITIONER

JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH

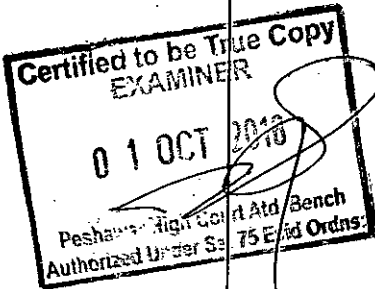
FORM OF ORDER SHEET

Date of order or proceedings	Order or other proceedings with signature of Judge(s).
(1)	(2)
19.09.2017	<p style="text-align: center;">W.P.No.515-A/2017</p> <p>Present: Mr. Sajid ur Rehman, Advocate for petitioner.</p> <p style="text-align: center;">*****</p> <p>SYED ARSHAD ALI, J:- Petitioner through the instant writ petition have approached this Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the following prayer:-</p> <p style="text-align: center;"><i>“Under the circumstances, it is respectfully prayed that on acceptance of the instant writ petition, the impugned order Endst# 8549-61 dated 07.08.2018 may kindly be set aside and the order Endst# 5546-49 dated 08.07.2017 may kindly be restored with all back benefits. Any other relief which this honourable court deem fit and proper may also be granted to the petitioner.”</i></p> <p>2. Brief but essential facts of the instant</p>



case are that the petitioner is civil servant who is working as Naib Qasid at GHS, Kakotri. After lapse of seven years, he was adjusted against the post of Lab Attendant at GHS, Machan Da Maira vide order dated 08.07.2017. Thereafter on 07.08.2018 he was transferred to GMS, Jolian against the post of Naib Qasid, hence, the petitioner being aggrieved from the said transfer order, has filed the instant writ petition.

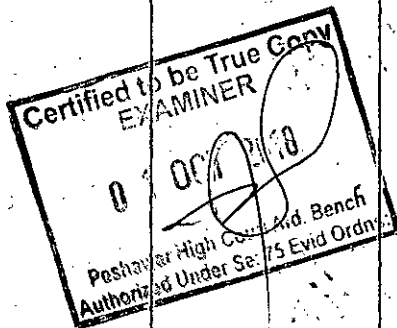
3. Be that as it may, admittedly the petitioner is a civil servant and his transfer & posting from one place to another place albeit reversion from higher post to lower post are the terms and conditions of his service. The jurisdiction of this Court is barred under Article 212 of the Constitution to entertain petition for enforcement of terms and conditions of the civil servants. Reliance is placed on cases Dr. Ahmad Salman Waris, Assistant Professor, Services Hospital, Lahore Vs. Dr. Naeem Akhtar and others (PLD 1997 Supreme Court 382) and Pir Muhammad V. Government of Baluchistan through Chief Secretary and others (2007 SCMR 54).



5/11

4. Hence, this petition being barred by Article 212 of the Constitution of Islamic Republic of Pakistan is dismissed *in limine*. However, the petitioner is at liberty to approach the appropriate forum for redressal of his grievance, if deemed appropriate.

Announced.
19.09.2017.



The Director
Elementary & Secondary Education
KPK Peshawar

Annexure - I (25)

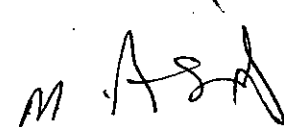
Subject: **DEPARTMENTAL APPEAL / REPRESENTATION**

Respected Sir,

1. That the Appellant is permanent and bonafide resident of Degra Village Kakotri, Union Council Beer District Haripur.
2. That the Appellant being permanent resident of Mohalah Degra Kakotri was appointed against the post of Class-IV as Naib Qasid GHS Kakotri.
3. That the appellant, after lapse of a period of 7 years was adjusted against the vacant post of Lab Attendant at Govt. High School Machan Da Maira vide Endst: No. 5546-49 dated 08.07.2017.
4. That the cadre of the Appellant i.e. from Naib Qasid to Lab Attendant was also put in the record of the appellant including service book of the appellant.
5. That the Appellant is withdrawing the salary against the post of Lab Attendant, copy issued vide Controller General of Accounts Pakistan as well as the District Accounts Office, Haripur.
6. That the DEO (Male) on the dictation of the newly local elected MPA has transferred the appellant from its native village i.e. Kakotri (Machan Da Maira) to GMS Jolian Union Council Tofkian against the post of Naib Qasid vide Endst No. 8569-61 dated 07.08.2018.
7. That the act of DEO(Male) is totally illegal, unlawful without jurisdiction against the ESTA Code Rules, the post of Class-IV local based and the Appellant is transferred from its native village Union Council Beer to another Union Council Julian which is approximately more than 50 KMs away from his native village.

It is therefore requested that on acceptance of departmental appeal, the transfer order bearing Endst No. 8569-61 dated 07.08.2018 passed by DEO(M) Haripur may graciously be suspended.

Dated 10/10/18


Applicant
Muhammad Asif
Lab Attendant GHS Machan Da
Maira Haripur

Annexure **K**

RESIDENTIAL CERTIFICATE

It is certified that MUHAMMAD ASIF s/o MUHAMMAD YOUSAFIS permanent resident of village KAKOTRI which lies in village council Kakotri union council Beer tehsil & district Haripur ,is residing within the limits of this union council.

[Signature]
Abdul Hameed, Awan
VIC Kakotri Haripur.

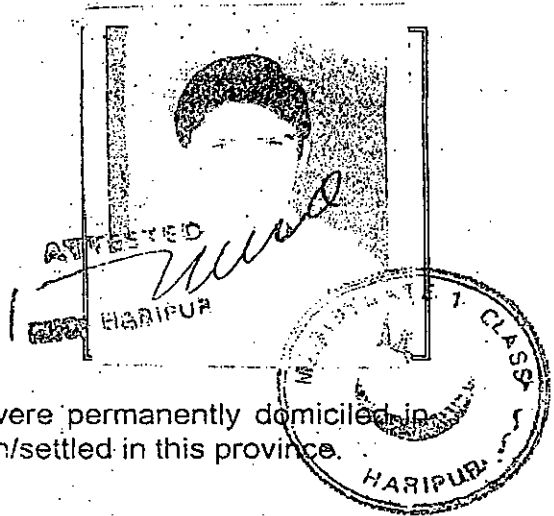
[Signature]
Secretary
Vc Kakotri

Tehsil & District Haripur

Deputy Secretary
Village Council Kakotri
District Haripur
5/12/17

[Signature]
Sajid-ur-Rehman Khan
ADVOCATE
M.A., LLB (HONS) Sn & Law (Huj)
Distt. Courts Haripur

DOMICILE CERTIFICATE



I declare that I am born of parents who are/were permanently domiciled in NORTH WEST FRONTIER PROVINCE having been born/settled in this province.

I was born at village / Mohallah..... DEGRA DAKHLI KAKOTRI.....
Tehsil..... HARI PUR..... District..... HARI PUR..... Hazara Division

M. Asif
Signature of the applicant

Dated: 14.12.1998

FOR OFFICE USE ONLY

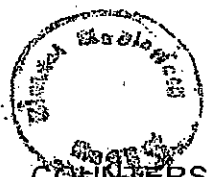
Pursuance to the declaration dated 14.12.1998
filled by Mr. / Miss..... MOHAMMAD ASIF..... S/D W/O..... MR. MOHAMMAD YOUSAF.....
domiciled in North West Frontier Province, it is hereby certified that the said
MR. MOHAMMAD ASIF..... is born of parents who are/were permanent
residents of the North West Frontier Province, having been born/settle within it.

Over Seal

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

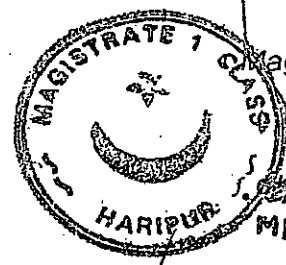
27146 on 20-9-2000
Counter Signed

This 25th day of Sep: 2000



COUNTERSIGNED,
DISTRICT MAGISTRATE
HARI PUR.

District Magistrate
HARI PUR



M Asif
Magistrate 1st Class
HARI PUR.
M. Asif
MIC: EAC. III HARIPUR

SYED BOOK DEPOT
Main Bazar, Haripur, Ph. 4399

M Asif
4/21
Sajid-ur-Rehman Khan
ADVOCATE
MA. LLB (HONS) Sh & Law (HUR)
Distt. Courts Haripur

روپی لیا جاتا ہے کہ محمد اکمل ولد محمد کوسیف قوم اہوان ساکنہ ڈیگہ داخلہ گورنری
 ہسپتال تحصیل ڈیگہ ہری پور ابتدائی تعلیم گورنمنٹ ہائی سیکولر گورنری سے
 حاصل کی ہے۔ یہ اپنے آباؤ اجداد سے اس گاؤں کا رہنے والا ہے۔

محمد اکمل ولد محمد کوسیف قوم اہوان ساکنہ ڈیگہ داخلہ گورنری
 ہسپتال تحصیل ڈیگہ ہری پور ابتدائی تعلیم گورنمنٹ ہائی سیکولر گورنری سے
 حاصل کی ہے۔ یہ اپنے آباؤ اجداد سے اس گاؤں کا رہنے والا ہے۔

محمد اکمل ولد محمد کوسیف قوم اہوان ساکنہ ڈیگہ داخلہ گورنری
 ہسپتال تحصیل ڈیگہ ہری پور ابتدائی تعلیم گورنمنٹ ہائی سیکولر گورنری سے
 حاصل کی ہے۔ یہ اپنے آباؤ اجداد سے اس گاؤں کا رہنے والا ہے۔

VERIFIED THE REPORTS
 OF REVENUE STAFF
 TEHSIL HARIPUR
 Naib-Talsildar Haripur

Prof. Abdul Rehman
 W.P.O. Kot Hajrudan Tehsil
 District Hangu
 Cell: 0334-0513025

وکالت نامہ

KHYBER PAKHTUNKHWA
 BAR COUNCIL

29

Sajid-ur-Rehman Khan
 Advocate
 Bc-10-1693
 Date of Issue: 27-12-2013
 Valid upto: 27-12-2016



از دفتر ساجد الرحمن خان ایڈووکیٹ ہائی کورٹ
 آفس نمبر 9، شیرپاؤ پلازہ ڈسٹرکٹ کورٹس ہری پور

بعدالت جناب سید عزیز محمد

منجانب مہر اصف اسلم

نوعیت مقدمہ Service Appeal بمقام گورنمنٹ

مندرجہ بالا عنوان میں اپنی طرف سے پیروی مقدمہ کیلئے ساجد الرحمن خان ایڈووکیٹ ہائی کورٹ کو پدیں شرط وکیل مقرر کیا جو کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب کو اطلاع دیکر حاضری کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پشہری کے علاوہ کسی اور جگہ یا پشہری کے مقرر اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پشہری کے کسی اور جگہ سماعت ہونے پر یا بروز پشہری کے اوقات کے آگے یا پیچھے ہونے پر منظر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ و پرداختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ، جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی و اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار پیہ وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیادینے اور سپردتاشی و رضی نامہ و فیصلہ برخلاف کرنے، اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتنالی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا ایڈووکیٹ کو بجائے اپنے یا ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے تاکہ مندر ہے۔ مضمون مختار نامہ مندر لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

المرکزہ 20/12/2013

Accepted & Attested
 ساجد الرحمن خان ایڈووکیٹ ہائی کورٹ

M. Asif
 Appellant
 petitioner

Before the Chairman of KPK Service Tribunal

M. Asif Vs Govt

put up to the court with
relevant appeal.

Service Appeal

Deed

4/2/19

Application for fixation of
appeal on 27/02/2019 instead of
08/02/2019

Be accelerated
as requested.

4/2/19

Respectfully shows that

① That the above titled appeal is pending
and fixed for preliminary hearing on
08/02/2019

② That the counsel for appellant is
practising in Abbottabad and have
a case on 27/02/2019 at Peshawar.

③ That it will be un-easy and
difficult for counsel to travel

from peshawar to Atollah
for 2 consecutive dates

Therefore, it is requested
that the date 08/02/2019
may kindly be changed
to 07/02/2019

Yours faithfully,
Sajid Mr. Rehman Khan
Adv. High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL JS-01-19
PESHAWAR

CM _____/2019

Service Appeal # IN 42 /20189

Muhammad Asif

V/S

Govt. of K.P.K etc

*put up to the court with
relevant appeal.*

SERVICE APPEAL

**APPLICATION FOR EARLY HEARING AND FIXATION OF
APPEAL AT PESHAWAR**

*25/11/19
Deodu*

Respectfully Sheweth:

1. That the above titled service appeal service appeal is fixed for hearing before this Honourable Tribunal.
2. That the valuable rights of the appellant request for an early hearing at Principal Seat Peshawar

It is therefore respectfully prayed that on acceptance of this application, an early hearing may kindly be fixed at Principal seat Peshawar.

M. Asif

Dated: 24/01/2019

Appellant

Through Counsel

Sajid-ur-Rehman Khan
Sajid-ur-Rehman Khan
Advocate High Court
At Haripur

*Be accelerated
to 8/2/2019 at
Peshawar.*

30/1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

CM _____/2019
IN
Service Appeal # 42 /2019

Muhammad Asif

V/S

Govt. of K.P.K etc

SERVICE APPEAL

**APPLICATION FOR EARLY HEARING AND FIXATION OF
APPEAL AT PESHAWAR**

AFFIDAVIT

I, Muhammad Asif son of Muhammad Yousaf resident of Mohallah Degrah Kakotri, Union Council Beer, Tehsil & District Haripur do hereby solemnly affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Dated: 24/01/2019

M. Asif
Deponent
Muhammad Asif



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

CM _____ /2019

Service Appeal # **IN** 42 /2019

Muhammad Asif

V/S

Govt. of K.P.K etc

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF IMPUGNED
TRANSFER ORDER 8549-61 DATED 07.08.2018 MAY
KINDLY BE SET ASIDE TILL THE FINAL DISPOSAL OF
SERVICE APPEAL**

Respectfully shewth:


1. That service appeal is being filed along with this application and this application may be treated as part and parcel of the service appeal
2. That the Respondent No.3 has illegally and unlawfully has transfer from native village Kakotri to GMS Julian Village Council Jualan on political basis.
3. That if the impugned transfer order not suspended then the appellatant will suffer irreparable loss and present service appeal will become infructuous.
4. That the balance of convenience also lies in favour of appellatant.

Therefore it is humbly prayed that the impugned transfer order No. 8549-61 dated 07.08.2018 may kindly be set aside till the final disposal of main service appeal

Dated: 24/01/2019


Appellant

Through Counsels


Sajid-ur-Rehman Khan
Advocate High Court
At Haripur

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

CM _____/2019

IN
Service Appeal # 42 /2018

Muhammad Asif

V/S

Govt. of K.P.K etc

APPLICATION

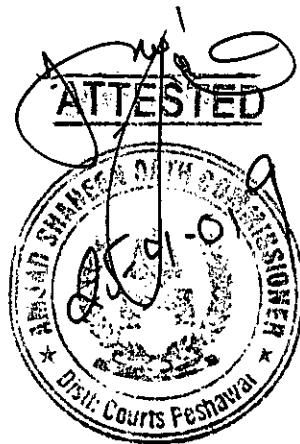
AFFIDAVIT

I, Muhammad Asif son of Muhammad Yousaf resident of Mohallah Degrah Kakotri, Union Council Beer, Tehsil & District Haripur do hereby solemnly affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Dated: 24/01/2019

M. Asif

Deponent
Muhammad Asif



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP COURT ABBOTTABAD.

Application in Service Appeal No. 42/2019

Muhammad Asif N/Q District Haripur

.....Appellant

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & Others

..... Respondents

REPLY TO APPLICATION FILED FOR SUSPENSION OF NOTIFICATION DATED 12-01-2019

Respectfully Sheweth :-

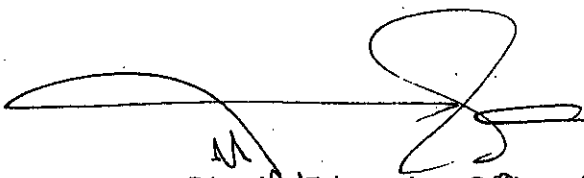
The Respondents submit as under:-

1. That the instant application in service appeal No.42/2019 of the present appellant is pending before this honorable Tribunal and is fixed for today.
2. That the respondent Department initiated disciplinary proceedings against the present appellant on sound grounds as he remained willful absent instead of repeated notices issued to him but he turned deaf ear to it.
3. That the notification dated 12-01-2019 was issued much prior than the filing of instant service appeal and he was removed from service on sound grounds.
4. That the notification dated 12-01-2019 regarding removal from service was issued in the interest of public service which is liable to be maintained.

It is therefore humbly prayed that on acceptance of foregoing comments/reply, the instant application along with main appeal may very graciously be dismissed and the notification dated 12-01-2019 may very kindly be maintained in the interest of public service, please.

Dated: 20 /05/2019.

Respondent.....


District Education Officer (M)
Haripur (for respondents)

①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP COURT ABBOTTABAD.

Service Appeal No. 42/2019

Muhammad Asif N/Q District Haripur

.....Appellant.

VERSUS

Secretary E&SE Department, Khyber Paktunkhwa & Others

..... Respondents

JOINT PARA WISE COMMENTS FOR & ON BEHALF OF RESPONDENTS NO: 1-3.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

1. That the appellant has no cause of action/locus standi.
2. That the instant Service Appeal is badly time barred.
3. That the appellant has concealed material facts from this Honorable Tribunal.
4. That the instant Service Appeal is based on mala-fide intentions.
5. That the appellant has not come to this Honorable tribunal with clean hands.
6. That the instant Service Appeal is against the prevailing law & rules.
7. That the appellant has been treated as per law, rules & policy.
8. That the appeal is not maintainable in its present form.
9. That the appeal is bad for mis-joinder and non-joinder of the necessary parties.
10. That the appellant has already been removed from service hence the instant appeal becomes infructuous.
11. That the appellant is not competent to file the instant appeal against the respondents.
12. That the appellant is not entitled for the relief seeking through instant appeal in the Respondent department.

ON FACTS

1. That Para-1, needs no comments being pertain to the personal record of the appellant.
2. That Para-2 is correct to the extent of his appointment as N/Q post in Education Department at GHS Kakotari but later on due to his unserious attitude towards his job/ duty, he was proceeded under the E&D Rules 2011 and by observing all codal formalities he was removed from his service vide order / notification No. 402-07/F.No.11-

1/GB/Disciplinary Action/M Asif Dated: 12-01-2019. **(Copy of order dated: 12-01-2019 is attached herewith as annexure-A)**

3. That Para- 3 is misrepresented and against the factual position, the appellant was charged in a murder case vide FIR No. 314 Dated: 16-09-2010 and his services were suspended and he did not surrender before the law, remained fugitive and absconder, due to which he was proceeded under the law and was dismissed from service, however later on he was acquitted by the court of law and was reinstated by the appellate authority vide order bearing Endst: No. 4812-16.F.No.A-20.C IV / Haripur Dated: 24-12-2014 and consequently was reinstated / adjusted against Naib Qasid post 06-06-2013 at GHS Kakotari by the office of DEO (M) Haripur vide order bearing Endst: No. 426-30 Dated: 17-01-2015. **(Copy of FIR dated: 16-09-2010, Copy of suspension Order Dated: 23-12-2010, Copy of Dismissal Order Dated: 28-04-2014, Copy of Court Judgement Dated: 06-06-2013, copy of Appeal for reinstatement, Copy of Reinstatement Order dated: 24-12-2014 and copy of further adjustment order Dated: 17-01-2015 are attached as annexure B,C,D,E,F,G & H).** Further more later on he was transferred against the vacant post of Lab Attendant on his own pay and grade. **(Copy of Transfer order is attached as Annexure-I)**
4. Para 4 is misconceived and against the facts, a civil servant appointed against a post in a cadre cannot change his cadre except in cases of promotion/fresh recruitment, but in the case of appellant, the acquisition code along with cadre has been changed by the appellant on malafide intention without bringing the matter in the knowledge of competent authority which is liable to be set aside.
5. That the appellant with malafide intention / fraud changed his cadre from Naib Qasid to Lab Attendant which is not permissible under the law. However the matter of changing his cadre and acquisition code came into the knowledge of competent authority when he was adjusted against his original post of N/Q at GMS Julian vide order dated 07-08-2018 as one Mr. Saddam Hussain Lab Attendant was adjusted against his original post after expiry of leave sanctioned to him upto 30-08-2018 vide order Dated: 27-08-2018 w.e.f 01-09-2018. **(Copy of orders are attached as Annexure J&K)**
6. Incorrect, the appellant was transferred on his original post purely on merit as one Mr. Saddam Hussain Lab Attendant was adjusted against his original post after expiry of leave sanctioned to him upto 30-08-

2018 vide order Dated: 27-08-2018 w.e.f 01-09-2018, while the appellant was adjusted on his original post as Naib Qasid at GMS Joulain Haripur vide order Dated: 07-08-2018 being wrongly posted against the Lab Attendant Post with additional submission that the adjustment order was passed / approved by proper competent authority but he did not ensure compliance of orders of his superiors and absented himself from his duty and therefore on reports from concerned quarter and notices issued to him by this office along with notices published in 02 news papers, Daily Nida-e- khalq Haripur dated 25-10-2018 and Daily Nawa-e- Hazara Abbottabad dated 25-10-2018 and opportunity of personal hearing by serving show cause notice upon him vide registered post, the appellant neither submitted reply to show cause nor appeared before the competent authority for personal hearing. Therefore after observing all codal formalities he was removed from service vide order dated 12-01-2019. **(Copy of absent report, copy of notice, copy of news papers, copy of show cause notice are attached as annexure-L,M,N,O,P and Q)**

7. That Para-7 needs no Comments.
8. That the Departmental appeal of the appellant was rejected on sound grounds.
9. Incorrect, the appellant does not fall within the definition of aggrieved person, as he is not serious to his duty/work inter-alia on the following and some other grounds.

GROUNDS.

- a. Incorrect & not admitted. The stand of the appellant is against the relevant provisions of law, rules & criteria for service adjustment on the grounds that the appellant was duty bound to work in his own cadre, pay & grade, while the act of the respondent Department is in accordance with law, rules and policy which is liable to maintained.
- b. That Para "b" of the grounds is incorrect and misconceived under section 10 of the N.W.F.P civil servant Act No. XVIII of 1973, every civil servant will be liable to serve anywhere within or outside the province, in any post under the Federal Government, or any Provincial Government or local authority or a corporation or body setup or established by any such Government.
- c. Incorrect & misleading on the grounds that the appellant was went upon to challenge authority, therefore was treated under the E&D Rules and was removed from service by observing all codal formalities.

- d. Incorrect, the detail reply is given in the above preceding Paras.
- e. Incorrect & denied. Detail reply to this ground has been given in the forgoing Paras. Hence, needs no further comments.
- f. That the answering respondents also seek permission of this Honorable Tribunal to adduce further points and facts at the time of arguments.
- g. Para "g" needs no comments.

PRAYER:

In the light of above maid humble submissions it is humbly prayed that the appeal of the appellant may very kindly be dismissed being devoid of merit please.

Secretary (E&SE) Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 1)

Director (E&SE)
Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 2)

District Education Officer (M)
Haripur.
(Respondent No. 3)

VERIFICATION:

Certified that contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

DEPONENT



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

No. 0995-610178,610268.

deomalehrp@yahoo.com

NOTIFICATION No. 1027 /F.No.11-1/GB/Disciplinary action/M.Asif Dated 12/1/2019.

WHEREAS, Mr. Muhammad Asif Naib Qasid Govt: High School, Macha Da Maira (Haripur) was proceeded under the Khyber Pakhtunkhwa civil servant (Efficiency and Disciplinary Rules-2011, on the charge of willful absence from duty.

WHEREAS, He was adjusted at Govt: Middle School, Joulia against his original post of Naib Qasid vide this office order Endst: No. 8569-61 dated 07-08-2018.

WHEREAS, As reported by the Headmaster Govt: High School, Macha Da Maira he was relieved on 18-08-18 from his duties and was directed to report for duty against his new assignment of posting vide letter No. 602 dated 18-08-2018.

WHEREAS, The Headmaster Govt: Middle School, Joulia has also reported that he did not join his duty uptill now vide letter No. Nil dated 24-08-2018.

AND WHEREAS, A final Show cause notice was published in two daily newspapers i.e. Daily Nada-i-Khalq Haripur dated 25-10-2018 and Daily Nawai Hazara Abbottabad dated 25-10-2018 directing him to join his duty within 15-days of the publication of the notice and appear before the appointing authority in person and clarify the position of his absence from duty, failing which an ex-parte decision shall be taken against him. But all efforts went in vain.

AND WHEREAS, taking a lenient view of the case he was further provided the opportunity by extending the date for further 15 days over and above the date already advertised in the newspapers through notice on his home address vide this office bearing No. 2333 dated 05-12-18 under registered cover. But he neither appeared in person nor submitted any reply.

NOW THEREFORE, in exercise of powers conferred upon the District Education Officer (Male) Haripur (Competent authority) under E&D Rules-2011 and keeping in view the absence reports sent by the Headmaster GHS Macha Da Maira & GMS Joulia and also on availability of evidence on record and by giving him the opportunity for submitting his reply and fulfilling all codal formalities.

I, the undersigned being the competent authority, is satisfied to impose the Major Penalty of Removal from service upon Mr. Muhammad Asif Ex-Naib Qasid Govt: High School, Macha Da Maira with effect from 18-08-2018 i.e. from the date of his absence from duty.

(Umer Khan Kundi)
District Education Officer (Male)
Haripur

Even No & date.

Copy of the above is forwarded to:-

- 1- The Director of Elementary & Secondary Education KPK Peshawar.
- 2- The Deputy Commissioner Haripur.
- 3- The District Accounts Officer Haripur.
- 4- The Headmaster Govt: High School Macha Da Maira.
- 5- The Headmaster GMS, Joulia.
- 6- The ADEO (Estab) local Office for OAMIS record.
- 7- The Concerned.

Deputy District Education Officer
(Male) Haripur

Annexure - "C"
p-7

99



**Office of the Executive District Officer
Elementary & Secondary Education Haripur**

PH No. 0995-610178, 610268

SUSPENSION

Mr. Muhammad Asif C-IV, GHSS Kakotri is hereby suspended from service w.e.f 16.09.2010, because he is involve in case vide FIR No.314 by the Police Station KTS Haripur under section 302 PPC dated 16.09.2010.

Further he is allowed for the ^{Suspension} ~~subsistence~~ allowance as per rules. Necessary entry to this effect should be made in his service book.


-----Sd/-----
Executive District Officer
Elementary & Secondary Education
Haripur

Endst: No. 17990-92

Dated: 27 /12/2010.

Cc:

1. The Senior District Accounts Officer, Haripur.
2. The Headmaster/ Cluster Incharge GHSS Kakotri Haripur.
3. Official concerned.
4. Office record file.


District Officer (Male)
Elementary & Secondary Education
Haripur

Haripur
Kakotri
14
Kand



Annexure
"D" P-8

120

Office of the Executive District Officer
Elementary & Secondary Education Haripur

ORDER

EDO (ETSC) Office
Yousaf N/Q GHSS
inal case vide FIR No. 2
2 PPC and Services of
vide EDO (ETSC) Haripur
10. He had been remanded
Kakotri Btr No 911 dated
of competent authority,
of S/O Muhammad Yousaf N/Q
dismissed w.e.f 17-9-2010

Consequent upon the approval of competent authority, the services of Muhammad Asif S/O Muhammad Yousaf N/Q GHSS Kakotri r/o village Kakotri District Haripur are hereby dismissed w.e.f 17.09.2010 under RSO 2000.

He was involved in criminal case vide FIR No.314 dated 16.09.2010 under 202 PPC and services were suspended w.e.f 16.09.2010 vide this office order No. 2 dated 23.12.2010. the accused official has never approved before any authority being absconder, Enquiry process dispense due to his non availability. He was served with absence notice vide this office No. (1) 10913 dated 12.10.2010 (2) No. 779 and final notice in news papers dated 05.03.2011, but up till date he is not performing his duties and also absconder as intimated by the Principal GHSS Kakotri Btr No.911 dated 13.04.2011.

He presented himself before the court and remained in Central Jail, after a compromised settlement. He is seeking rehabilitation.

Executive District Officer
Elementary & Secondary Education
Haripur
Dated: 26/04/2011

Principal GHSS Kakotri Haripur w/r to his office letter No.894 dated 01/04/2011 for intimation and necessary entries in his service record. Copy of this order is being placed in the concerned service record file.

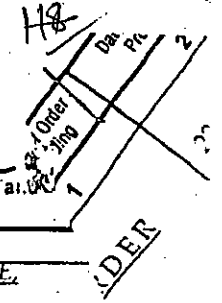
Executive District Officer
Elementary & Secondary Education
Haripur

Requested for your consideration

EJAZ AHMED KHAN
Principal
GHSS Kakotri

08/7/2013

دورہ 1300 اور 1301 کے لیے



Serial No. of Order of Proceeding Date of Order of Proceeding Order or other proceedings with signature of Judge or Magistrate and that of Parties or Counsel, where necessary

1 2 3

13/7 2012
19/1/12 2012
6/1/13 2013
102
41384
1416

دورہ 1300 اور 1301 کے لیے

IN THE COURT OF AYAZIUN ZIA, SESSIONS JUDGE, HARIPUR.

Case file No. 13/7 of 2012.
Date of Institution: 19/01/2012.
Date of Decision: 06/06/2013.

P-9

State Vs Muhammad Asif

Case FIR No. 314 dated 16/09/2010 U/S 302 PPC, Police Station KTS, Tehsil & District Haripur

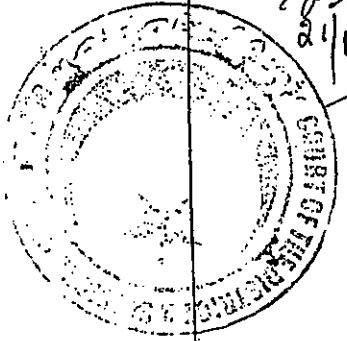
ORDER
06/06/2013

Accused facing trial namely Muhammad Asif is charged in case FIR No.314 dated 16/09/2012 u/s 302 PPC, Police Station KTS, Haripur for the murder of Muhammad Rizwan s/o Haider Zaman. APP on behalf of the state present.

ADO(E)

put up for further info

21/1/13



Attested to be true copy
Authorized U/A 87 of
Qanoon-e-Shahadat order; 1988
Date 24/07/13

Examiner
Sessions Judge
Haripur

Today, LRs of deceased Muhammad Rizwan namely 1) Asad Mehmood, 2) Sajjad Ahmad (brothers of the deceased), 3) Mst. Nasreen (sister of the deceased), and 4) mst. Mehboob Sultan (mother of deceased), appeared before this court and recorded their joint statement in respect of compromise duly identified and verified by witnesses/jirga members, wherein they stated that they have effected a genuine compromise with the accused facing trial and received a sum of Rs.20,00,000/- as part of the diyat and waived off their right to remaining diyat amount. In this respect, they produced compromise proforma ExP.A and compromise affidavit ExP.B alongwith copies of their respective CNICs ExP.C to Ex.P.F. Moreover, a special condition was also settled between the parties that accused will not visit the crime village during the lifetime of mother of the deceased. In this respect, a separate undertaking was scribed, copy of which is ExP.G.

Order No.	Date of Order of Proceeding	Order or other proceedings with signature of Judge or Magistrate and that of Parties or Counsel, where necessary
	2	3

79/7 2013

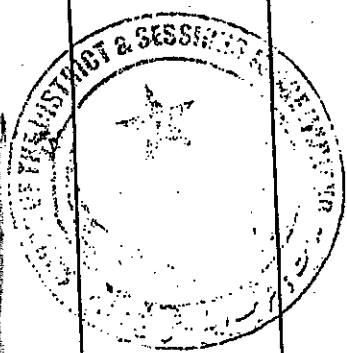
Gul Muhammad and Fazal-ur-Rehman jirga members, appeared as witnesses of the compromise and also recorded their joint statement wherein they verified/endorsed the factum of compromise between the parties. They also supported the undertaking Ex.P.C.

As per the list of LRs placed on the record by the concerned I.O, the abovementioned mentioned LRs are the only LRs of the deceased.

Keeping in view the above facts and circumstances and peace and tranquility between the parties, the compromise arrived between the parties is genuine, hence is accepted and the accused facing trial is hereby acquitted of the offence charged with. He is in custody, be released forthwith if not required in any other case. Case property if any, be kept intact till the expiry of period of appeal/revision and thereafter, the same be dealt with in accordance with law. File be consigned to record room after completion and compilation.

Announced
06/06/2013

(Signature)
(AYMON ZIA)
SESSIONS JUDGE,
HARIPUR



Requested to be true copy
Authorized U/A 87 of
Shahadat order; 198
24-07-13
(Signature)
Sessions Judge
Haripur

No. 183-24-06-13

Date of presentation of application

No of Words 10

Court Fee

Stamp Fee

24-07-13

24-07-13

24-07-13

7

Udt: EB

Annexure
"F"

107

بجسور جناب ڈی ای او صاحب ہری پور

بوساطت؛ جناب پرنسپل صاحب گورنمنٹ ہائیر سیکنڈری سکول ککوتری ہری پور

عنوان؛ اپیل برائے بحالی ملازمت بطور نائب قاصد - C.iv

جناب عالی!

DEO
HU

08/7/13

گزارش ہے کہ سائل مورخہ 10-04-2010 سے گورنمنٹ ہائیر سیکنڈری سکول ککوتری ہری پور میں بطور نائب قاصد تعینات تھا۔

دوران ملازمت مورخہ 16-09-2010 کو ایف آئی آر نمبر 314 کے تحت تھانہ کھلاہٹ میں سائل کے خلاف قتل کے الزام پر مہمہ مقدّمہ درج ہوا۔ اپنی اور اہل خانہ کی جانوں کو خطرہ لاحق ہونے کے باعث سائل بمعد اہل خانہ گھربار اور علاقہ چھوڑ کر چلا گیا۔

مورخہ 29-11-2011 کو سائل نے مقدمہ عنوان بالا میں خود کو قانون کے حوالے کیا اور مورخہ 06-06-2013 تک سنٹرل جیل ہری پور میں زیر حراست رہا۔ عدالتی فیصلے کی رو سے سائل کو مندرجہ بالا مقدمہ میں بری کر کے رہا کیا گیا۔

جناب عالی! اس طویل عرصہ کے دوران محکمہ تعلیم کے ارباب اختیار نے سائل کے خلاف RSO-2000 قانون کے تحت کارروائی کر کے معطل کرنے کے بعد برطرف کر دیا۔ اپنے خلاف ہونے والی کسی بھی محکمہ کارروائی کا علم سائل

مورخہ 17-09-2010 کو ملازمت سے معطل کرنے کے بعد برطرف کر دیا۔ اپنے خلاف ہونے والی کسی بھی محکمہ کارروائی کا علم سائل کو بروقت نہیں ہوا۔

حضور والا! سائل اس وقت گونا گوں معاشرتی مسائل کا شکار ہے اور ملازمت ختم ہو جانے کے باعث شدید ذہنی اذیت کا شکار ہے۔ مفلوک الحال خاندان کا واحد کفیل ہے۔ اس لئے آپ سے عاجزانہ التماس ہے کہ سائل کو انسانی ہمدردی کے ناطے ملازمت پر بحال کرنے

کے احکامات صادر فرمائیں۔ امید واثق ہے کہ درخواست ہذا پر انتہائی ہمدردانہ غور کیا جائے گا۔

Shakeel Anwar DA
Put up in file

DEO
HU
9/7

العارض

M Asif
محمد آصف ولد محمد یوسف

C.iv گورنمنٹ ہائیر سیکنڈری سکول ککوتری ہری پور

94
8-7-13

P.T.O cont: on next page

1) According to order No 7257-58 EDO (ETSC) Office Hasepur
Mr. Muhammad Asif s/o Muhammad Yousaf N/O GHSS Kakotri
Hasepur was involved in criminal case vide FIR No 314
dated 16.9.2010 under Section 302 PPC and Services of the Officer
were suspended w.e.f 16.9.2010 vide EDO (ETSC) Hasepur
Order No 7990-92 dated 23.12.2010. He had been remained
in custody vide principal GHSS Kakotri btr No 911 dated
13.4.2011.

2) Consequently upon the approval of competent authority,
the services of Muhammad Asif s/o Muhammad Yousaf N/O
GHSS Kakotri Hasepur were dismissed w.e.f 17-9-2010
under RSO 2000.

3) Mr Muhammad Asif presented himself before the Court
of Law on 29 Nov, 2011 and remained in Central
Jail Hasepur up to 6th June, 2013.

4. He was released from jail, after a compromised
deal with the deceased family.

5. Now, through this application, he is seeking rehabilitation
of his govt. services.

Application is being forwarded for your consideration
and action please.

EJAZ AHMED KHAN
Principal
GHSS Kakotri

08/7/2013

Annexure - "G" p. 12

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

NOTIFICATION

WHEREAS, Muhammad Asif Naib Qasid GHS Kokotri, District Haripur was charged under Government of Khyber Pakhtunkhwa E&D Rules-2011 by the District Education Officer (Male) Haripur due to his involvement in murder/police case vide FR No. 314 dated 16.09.2010 followed by his willful absence from duty with effect from 17.11.2010 resulting which he was suspended from service by the District Education Officer concerned vide order No. 17990-92 dated 23.12.2010.

AND WHEREAS, Mr. Muhammad Asif Naib Qasid was dismissed from service by the DEO (M) Haripur vide order No. 7257-53 dated 28.04.2014 being absconder/involved in murder/police case.

AND WHEREAS, the said Naib Qasid was arrested by the police on 29.11.2011 and he was dealt under the law accordingly. On termination of court proceeding against him, he was finally acquitted by the Honorable Court vide Judgment dated 06.06.2013

AND WHEREAS, consequent upon his acquittal/release from the police case the aggrieved Naib Qasid lodged an appeal dated 11.07.2014 to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against the major punishment awarded to him whereby he was dismissed from service by the DEO(M) Haripur. Vide order No. 7252-47 dated 28.04.2011.

AND WHEREAS, his appeal was considered for review by the Director E&SE Khyber Pakhtunkhwa, Peshawar being appellant authority as per provision envisaged in Sub; Para-17 of the E&D Rules-2011 in the instant case. His appeal was sent to the DEO concerned vide letter No. 865 dated 18.08.2014 for report/comments.

AND WHEREAS, consequent upon receipt of the detailed report from DEO (M) Haripur vide letter No. 12878 dated 20-09-2014, the order and circumstances under which Mr. Muhammad Asif Naib Qasid, GHS Kokotri, District Haripur was dismissed from service were analyzed/reviewed by the appellant authority in the light of Honorable Court Judgment dated 06.06.2013 and in terms of the procedure as laid down in the E&D Rules-2011. The appellant authority was of the view that the circumstances under with Mr. Muhammad Asif Naib Qasid remained absconder/absent from duty were beyond his control.

NOW, THEREFORE, in exercise of powers conferred by the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules 2011, the Appellate Authority is pleased to accept the appeal of Mr. Muhammad Asif Naib Qasid, GHS Kokotri, District Haripur. His dismissal order cited above is set aside. He is reinstated in service from the date of his acquittal by the Honorable Court. The intervening period will be decided later on.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

4812-16

Endst.No. _____ /F.No. A-20/C-IV/Haripur. Dated Peshawar the 27/12/2014.

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

- 1- District Education Officer (Male) Haripur with reference to her letter No. 12878 dated 20.09.2014
- 2- District Accounts Office Haripur
- 3- Principal GHS Kokotri, Haripur.
- 4- Appellant concerned
- 5- PA to the Director E&SE Khyber Pakhtunkhwa Peshawar

3745
9/1/15

20/1/15

Deputy Director (F&A)
E&SE, Khyber Pakhtunkhwa, Peshawar

Simpth E/S
27/12/2014

27/1/15



P-13
Annexure - "H"

Office of the District Education Officer
Haripur

Phone No.0995-610178 / 610268.

RE-INSTATEMENT IN SERVICE

Consequent upon the acceptance of appeal by the worthy Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar vide notification issued under Endst:No.4812-16/F.No.A-20/C.IV /Haripur, dated 24-12-2014, Mr. Muhammad Asif Naib Qasid S/O Muhammad Yousif is hereby re-instated in Service w.e.f. 06-06-2013 at Govt: Higher Secondary School, Kakotri against the original post post of Naib Qasid.

- Note:-
1. Intervening period shall be decided later on from 6-6-2013 to the date of taking over charge.
 2. Charge report should be submitted to all concerned.

Sd/-
District Education Officer
(Male) Haripur.

Endst:No. 426-30 / Dated Haripur the 17/01 /2015.

Copy for information & necessary action to :-

- 1- The Director E&SE KPK Peshawar w/r to his notification No & date cited above.
- 2- The Principal GHSS, Kakotri (Haripur) with the remarks that if he has changed the cadre from Chowkidar to N/Qasid post, it shall stand null & void.
- 3- The District A/C's Officer Haripur.
- 4- Mr. Muhammad Asif S/O Muhammad Yousif.
- 5- O.O. file

Dy: District Education Officer
(Male) Haripur.



Annexure - F1
P-14

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

Transfer / adjustment.

0995/610178, 610268.

Consequent upon the approval by the competent authority that Mr. Muhammad Asif N/Qasid Govt: High School, Darwesh is hereby transferred at Govt; High School, M.D. Maira, against the vacant post of Lab Attendant on his own pay & grade in the interest of public service with immediate effect.

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

Sd/-
District Education Officer
(Male) Haripur.

Dated Haripur the 8/7 /2017.

5546-49
Endst.No. 5546-49 /C/IV / G.Br./

Copy to :-

- 1-The District A/Cs Officer Haripur.
- 2-3)The HM GHS, Darwesh & M.D.Maira.
- 4-O.O. file.

Receivable 08/07/17
Dy: District Education Officer
(Male) Haripur



Annexure - J, P-15

Office of the District Education Officer (Male)
Haripur

PH No. 0995-610178, 610268

Order

As approved by competent authority, Mr Muhammad Asif N/Q working wrongly against the post of L/Attand: GHS M .D. Maira Haripur is hereby adjusted against his original post of N/Q at GMS Joulia, on his own pay and grade in the interest of public service with immediate effect .

1. No TA/DA or TG is allowed.
2. Charge report should be submitted to all concerned

Endst: No. 8569-61

-----Sd/-----
District Education Officer (Male)
Haripur

Dated: 07 / 08 / 2018.

Cc

1. Senior District Accounts Officer Hraipur.
2. Headmaster GHS M.D Maria Haripur
3. Headmaster GMS Joulia Haripur
4. Office copy.


Asst: District Education Office (M)
Haripur

حضرت جناب ڈی او ای او مہذب (مردانہ) ضلع ہری پور -

Annex - "K" - 16

163

جناب عالی -
تاریخ ہے کہ سائے ڈی او ای او مہذب ہری پور
تاریخ 30 08 2016

لیپ ایڈمنٹ فورم 2016
بائے موجود کسی گھر بلو معروضیت کے باعث باقاعدہ طور پر
leave (730 دن) تک

مورخہ 01 09 2016 تا 01 08 2018
مذکورہ سوائے جس کے گاؤں درخواست جذا کے ساتھ منسلک
ہے۔ اب چونکہ سائے کے گھر بلو حالات گھٹیا ہیں اور سروس جاری
رکنے کے قابل نہیں، لہذا برائے سہ ماہی قواعد و ضوابط کے مطابق

مورخہ 01 09 2018 سے دوبارہ اسے سروس میں لے کر
تعمیناتی کارڈ جاری فرمایا جائے۔
مقرر سیکول معیار میں مذکورہ پوسٹ Vacant ہے۔

Received 21/9/2018

القاریہ
مدامین لیپ ایڈمنٹ ڈی او ای او مہذب ہری پور

Forwarded
to the D.E.O (M)
Haripur
for n/a please.
24/08/18

Head Master
GHS M.D Maira
Haripur

3-1142351-23302

Date: 24-08-2018

Piece of the Headmaster GMS JULIAN (Haripur)

Annexure
"L" P-17 Dated 24-08-18 (4)

To:

The D.E.O. (M) Haripur.

Subject:

Report regarding Muhammad Asif N/A
has not been taken charge till 24-08-18

Sir,

Respectfully, it is for your kind information that Mr. Muhammad Asif N/A of GMS M.D. Maira, Distt: Haripur, who has been transferred from GMS M.D. Maira to GMS Julian Haripur under Endct. No. 8569-61 Dated 07-08-18.

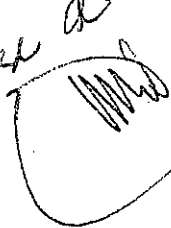
The said class @ Muhammad Asif did not took charge till this date. 24-08-18


It is requested to take necessary action please

Thanks.

Supdt (G)

Please do the needful

 24/8/2018



Head Master
Govt. Middle School
Julian (Haripur)

24/08/18

27/9/18

ز دفتر محترم ماسٹر GAS جولیان - ضلع جھڑ پور

تاریخ 18/08/08

Annex - 18

960-B

پیام : محمد آصف ولد محمد يوسف کاندہ محلہ دنگرہ گاؤں گکوری - ملازم نائب قاعدہ GAS جولیان -

مضمون : نوٹس عنبر حافی

یادداشت : بحوالہ ٹرانسفر آرڈر نمبر 8569-6 مورخہ 18-08-07

از دہانہ D.E.O حوی پور، آب ڈیپارٹمنٹ، درج ذیل تاریخ تک سیکولر پرائس خارج نہیں کیا۔ لہذا آب کو مزید نوٹس آگاہ کیا جاتا ہے کہ آب 7 سات دن کے اندر اندر اپنی ڈیلوٹی بر حاضری ہوں۔ ورنہ ایک خلاف ایفیشنٹی اینڈ ڈسپلن رولز 2011 تحت یکطرفہ کارروائی عمل میں لائی جائے گی۔

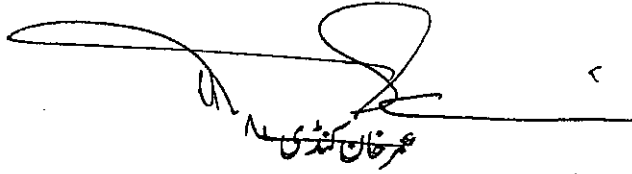
U.S. GAS
25/08/18
Govt. Middle School
Jaulian (Haripur)

Annexure "M" P-19

دفتر ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ہری پور

نوٹس غیر حاضری

ہرگاہ آپ مسی محمد آصف ولد محمد یوسف محلہ دیگران گاؤں سکوتری ملازم گورنمنٹ ہائی سکول چھاں دامیرا ضلع ہری پور آپ کو اپنی اصل نائب قاصد کی پوسٹ پر بذریعہ آرڈر نمبر 61-8569 مورثہ 07-8-2018 کو گورنمنٹ ہائی سکول جولیاں میں اڈجسٹ کیا گیا تھا۔ اور متعلقہ ہیڈ ماسٹر نے بھی آپ کو لیٹر نمبر 602 مورثہ 18-08-18 کو ریلیو کر کے ہدایت کی کہ آپ اپنے گورنمنٹ ہائی سکول جولیاں میں حاضری کریں۔ آپ نے ابھی تک نہ حاضری کی ہے اور نہ دفتر کو رجوع کیا ہے۔ آپ کو بذریعہ اشتہار ہذا مطلع کیا جاتا ہے کہ اس نوٹس کی اشاعت کے 15 دن کے اندر اندر آپ زبردستی کے پاس حاضر ہو کر اپنی غیر حاضری کی منقول وجہ ہو تو بیان کریں۔ ورنہ آپ کے خلاف قواعد و ضوابط کے مطابق یکطرفہ کارروائی عمل میں لاتے ہوئے آپ کو ملازمت سے برخاست کر دیا جائے گا۔


محمد خان کنڈی

ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ)

ہری پور

11/10

25-10-2018.

Annex "N" p-20

پشاور اور ہری پور سے بیک وقت شائع ہونے والا سب سے پہلا واحد کثیر الاشاعت قومی اخبار
DAILY NADA-I-KHALQ HARIPUR باقاعدہ تصدیق شدہ اشاعت روزنامہ

ہری پور
A.B.C
CERTIFIED
Member APNS
چیف ایڈیٹر ڈاکٹر چین مبارک ہزاروی

صفحات 8 قیمت 10

108

جمرات 25 اکتوبر 2018ء برطانیہ 15 ستمبر 1440ھ

14

دفتر ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ہری پور

ذمہ دار

برگاہ آپ کسی محکمہ و دیگر دست عملہ دیکھا گیا ہے کہ اس کو کوری ملازم گورنمنٹ سکول
بجائے رہا ہے۔ ہری پور کو اپنی اصل نائب قاضی کی پوسٹ پر بذریعہ آڈیٹر
8569-61 مورخہ 07-08-2018 کو گورنمنٹ مل سکول جولیان میں ایڈجسٹ کیا
گیا تھا اور متعلقہ ہیڈ ماسٹر نے بھی آپ کو لیٹر نمبر 602 مورخہ 18-08-18 کو
رہیو کے کہدیت کی کہ آپ اپنے گورنمنٹ مل سکول جولیان میں حاضری کریں آپ
نے ابھی تک حاضری کی ہے نہ ہی دفتر رجوع کیا ہے۔

آپ کو بذریعہ اشتہار پتلا کیا جاتا ہے کہ اس نوٹس کی اشاعت کے 15 روز بعد آپ
ذریعہ سختی کے پاس حاضر ہو کر اپنی غیر حاضری کی مقبول وجہ و توجیہ بیان کریں، ورنہ آپ کے
غلاف قواعد و ضوابط کے مطابق ٹیکسٹ کارروائی عمل میں لاتے ہوئے آپ کو ملازمت سے
برخواستہ کر دیا جائے گا

عمر خان کنڈی

ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ہری پور

BN/A01222

Website: <http://www.dailynawaahazara.com> ----- e-mail: nhazara77@gmail.com

ABC Certified **روزنامہ نواز شریف** Member APNS

ایبٹ آباد چیف ایڈیٹر: محمد وسیم عباسی

روزنامہ نواز شریف

شمارہ نمبر 135 جلد نمبر 12

بھارت 25 ستمبر، 2018ء، 15 ستمبر، 1440ء صفحات، 8، قیمت 10 روپے

Tel: 0992-342326, 051-2202888, Fax: 051-2202868

دفتر ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ہری پور

نوٹس غیر حاضری

ہر گاہ آپ کسی محمد آصف ولد محمد یوسف محلہ دیکراں گاؤں ککوتری ملازم گورنمنٹ ہائی سکول سکول جھان داہیرا ضلع ہری پور آپ کو اپنی اصل ثابت قاعدہ کی پوسٹ پر بذریعہ آرڈر نمبر 61-8569 مورخہ 07-08-2018 کو گورنمنٹ ہڈل سکول جولیاں میں اڈجسٹ کیا گیا تھا اور متعلقہ ہیڈ ماسٹر نے بھی آپ کو لیٹر نمبر 602 مورخہ 18-08-18 کو بریلو کر کے ہدایت کی کہ آپ اپنے گورنمنٹ ہڈل سکول جولیاں میں حاضری کریں آپ نے ابھی تک نہ حاضری کی ہے ورنہ دفتر کو رجوع کیا ہے آپ کو بذریعہ اشتہار بذراطلاع کیا جاتا ہے کہ اس نوٹس کی اشاعت کو 15 دن کے اندر اندر آپ زبردستی کے پاس حاضر ہو کر اپنی غیر حاضری کی مقبول وجہ بتو بیان کریں ورنہ آپ کے خلاف قواعد و ضوابط کے مطابق یکطرفہ کارروائی عمل میں لاتے ہوئے آپ کو ملازمت سے برخاست کر دیا جائیگا۔

محمد عثمان کنڈی (ڈسٹرکٹ ایجوکیشن مردانہ) ہری پور

دفتر ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ہری پور

5/10/18

F-22

23/11/18

رجسٹرڈ

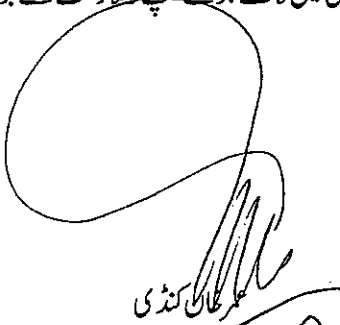
محمد آصف ولد محمد یوسف ملازم گورنمنٹ ہائی سکول جولیاں ہری پور محلہ دیگران گاؤں سکوتری نام:

مضمون: نوٹس غیر حاضری

یادداشت:

ہر گاہ آپ کو اس سے قبل بھی بذریعہ روزنامہ ندائے خلق ہری پور بمورخہ 25-10-2018 اور نوائے ہزارہ ایبٹ آباد بمورخہ 25-10-2018 آگاہ کیا جا چکا ہے کہ آپ کو اپنی اصل پوسٹ نائب قاصد پر بذریعہ آرڈر نمبر 61-8569-61 بمورخہ 07-08-2018 کو GMS جولیاں ہری پور ایڈجسٹ کیا گیا تھا۔ لیکن آپ نے متعلقہ سکول سے ریلیو ہونے کے باوجود اپنے ڈیوٹی کے اسٹیشن یعنی GMS جولیاں میں تاحال حاضر ہونے سے قاصر رہے۔

آپ کو بذریعہ نوٹس ہذا آخری بار مطلع کیا جاتا ہے کہ اس نوٹس کے ملنے کے 15 دن کے اندر اندر آپ زبردستی کے پاس حاضر ہو کر اپنی غیر حاضری کی معقول وجہ ہو تو بیان کریں۔ ورنہ آپ کے خلاف قواعد و ضوابط کے مطابق یکطرفہ کارروائی عمل میں لاتے ہوئے آپ کو ملازمت سے برخاست کر دیا جائے گا۔



ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ)

ہری پور

EXPRESS POST

Consolidate Report
Haripur GPO

P-23

Sender Name: [Redacted] Akhtar
Sender Address: [Redacted]
Sender Name: EDO

5/12/2018 AM

Sr #	Article ID	Recipient Name	Recipient Address	City	Weight/Amount	Tariff/Commission
1	RGL16707956	SECTION OFFICER	ESEDU DEPP KPK PES	Peshawar	60	50
2	RGL16707955	MUHAMMAD ASIF	JU SERVENT GH SCHOOL KAKOTRE	Haripur	20	38
Total					80	88

Handwritten signature and date: 5/12/2018