

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 692/2019

Date of Institution ... 24.05.2019

Date of Decision ... 20.10.2021

Mst. Shakeela Masih (Ex-PST) at GGPS Gul Mat Kor Khushali Tehsil Mirali. R/o Pir Rehman Kot Mirali District Bannu.

... (Appellant)

VERSUS

The Director Education FATA, FATA Secretariat Peshawar and two others.

... (Respondents)

MISS. NAILA JAN

Advocate

... For Appellant

MR. ASIF MASOOD ALI SHAH,

Deputy District Attorney

... For Respondents

ROZINA REHMAN

ATIQU-UR-REHMAN WAZIR

...

...

MEMBER (JUDICIAL)

MEMBER (EXECUTIVE)

JUDGMENT

ATIQU-UR-REHMAN WAZIR MEMBER (E):-

Brief facts of the case are

that the appellant was appointed as Primary School Teacher and the appellant was serving in North Waziristan. During the course of her service, the appellant was proceeded against on the charges of absence from duty and was awarded with major penalty of compulsory retirement from service vide order dated 21-03-2018. Feeling aggrieved, the appellant filed departmental appeal, which was not responded, hence the instant service appeal with prayers that impugned order dated 21-03-2018 may be set aside and the appellant may be re-instated in service with all back benefits.

02. Learned counsel for the appellant has contended that absence of the appellant was not willful but due to illness, which does not amount to misconduct, hence the impugned order is liable to be set aside; that no charge sheet/statement of allegations has been served upon the appellant; that letter dated 17-01-2018 would show that the appellant is shown as compulsory retired even before issuance of the impugned order dated 21-03-2018, which alone is sufficient to declare the impugned order as void order; that no regular inquiry was conducted nor did any opportunity of personal hearing have been provided to the appellant; that till date, the appellant is ill, however the inquiry officer did not bother to take into consideration her illness or to inquire from the concerned hospital regarding illness of the appellant; that the appellant has not been provided right of fair trial as guaranteed by Article 10-A of the Constitution.

W h 03. ~~Learned Deputy District Attorney~~ for the respondents has contended that the appellant was issued show cause notice on her willful absence from duty vide order dated 07-02-2018, but the appellant did not respond, hence the same notice was published in a national daily on 20-02-2018; that inquiry was dispensed with, but the respondents taking a lenient view and taking into consideration her long service, imposed major punishment of compulsory retirement from service.

04. We have heard learned counsel for the parties and have perused the record.

05. Record reveals that the appellant has been shown as proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, but has been awarded with major punishment of compulsory retirement from service on the basis of a show cause notice, hence the appellant was kept deprived of opportunity of defense as inquiry was dispensed with, without recording any reason, thus the respondents skipped a mandatory step in the disciplinary proceedings, therefore action of authority in awarding major

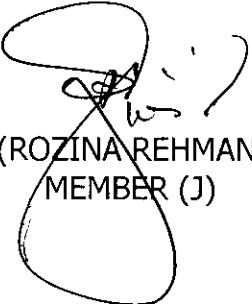
penalty in circumstances, was in sheer violation of principles of natural justice. Reliance is placed on 2011 PLC (C.S) 387. It otherwise is a well settled legal proposition that regular inquiry is must before imposition of major penalty, which however was not done in case of the appellant and the appellant was condemned unheard. Reliance is placed on 2009 PLC (C.S) 650. The Supreme Court of Pakistan in another judgment reported as 2008 SCMR 1369 have held that in case of imposing major penalty, the principles of natural justice required that a regular inquiry was to be conducted in the matter and opportunity of defense and personal hearing was to be provided to the civil servant proceeded against, otherwise civil servant would be condemned unheard and major penalty would be imposed upon him without adopting the required mandatory procedure, resulting in manifest justice. On this score alone, the impugned order is liable to be set at naught. The respondents failed to frame proper charge and its communication to the civil servant alongwith statement of allegations explaining the charge and other relevant circumstances proposed to be taken into consideration. Framing of charge and its communication alongwith statement of allegations was not merely a formality but it was mandatory prerequisite which was to be followed. Reliance is placed on 2000 SCMR 1743.

06. Ailment factor of the appellant was not taken into consideration by the respondents, the appellant however had placed valid reasons of her treatment alongwith documentary proof, which however, were not taken into consideration. The appellant neither absented herself deliberately nor intentionally, so the respondents should have considered case of the appellant as a case of hardship rather. Reliance is placed on PLJ 2018 Tr.C. (Services) 138. As is held in various judgments of the apex court, absence from duty on medical ground without permission of competent authority does not constitute gross misconduct, entailing major penalty. Most importantly, we have observed that Agency Education Officer vide his letter dated 17-01-2018 has referred the name of the appellant as


compulsory retired from service, whereas she was retired vide order 21-03-2018, which shows malafide on part of the respondents that they had already decided to award such punishment to the appellant and issuance of show cause on 07-02-2018 was only to the extent of fulfillment of codal formalities, which however was not warranted. Record does not support that such show cause was served upon the appellant, hence the appellant was condemned unheard. We are of the considered opinion that the appellant has not been treated in accordance with law.

07. In view of the foregoing discussion, the instant appeal is accepted. The impugned orders dated 21-03-2018 is set aside and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
20.10.2021



(ROZINA REHMAN)
MEMBER (J)



(ATIQ UR REHMAN WAZIR)
MEMBER (E)

ORDER


20.10.2021


Appellant with counsel present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Shahid Nawaz ADO (Litigation) for respondents present.

Vide our detailed judgment of today, separately placed on file, the instant appeal is accepted. The impugned orders dated 21-03-2018 is set aside and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

20.10.2021


(ROZINA REHMAN)
MEMBER (J)

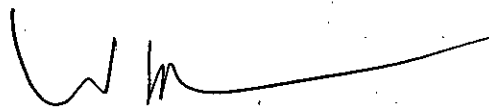

(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

14.10.2021

Appellant with counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Muhammad Nisar Focal Person of respondents present.

Partial arguments heard on behalf of appellant. [@] ~~heard.~~
Learned A.A.G requested for adjournment on the ground that the instant case was marked to Asif Masood Ali Shah, learned Deputy District Attorney and due to a domestic issue, he has gone to home. Adjourned. To come up for further arguments on 20.10.2021 before D.B.



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



(Rozina Rehman)
Member (J)

31-12-2020


Due to summer vacation, case is adjourned to
18-3-2021 for the same as before.


Reader

18.03.2021

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

On the last date, the proceedings were adjourned upon the strength of Reader's Note. Notices shall, therefore, be issued to appellant/counsel for next date of hearing. Adjourned to 10.06.2021 for arguments before D.B.


(SALAH-UD-DIN)
MEMBER (JUDICIAL)



CHAIRMAN

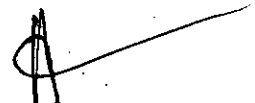
10.06.2021

Nemo for appellant.

Javid Ullah learned Assistant Advocate General alongwith Muhammad Nisar Senior C.T for respondents present.

Notice be issued to appellant/counsel for 14.10.2021 for arguments before D.B.


(Rozina Rehman)
Member (J)


Chairman

Noted by
Nabila Jinnah
AHC
30/06/2021

30.06.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for the respondents present.

Again, request was made for submission of comments on behalf of respondent No.3. Case is adjourned on cost of Rs.2000/-. To come up for written reply/comments of respondent No.3, on 20.08.2020 before S.B.



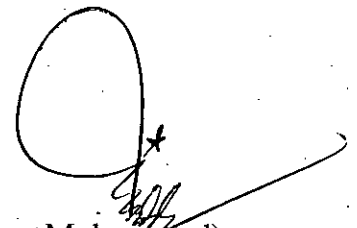
Member (J)

20.08.2020

Counsel for the appellant present. Addl: AG for respondents present. Representative of the respondents are absent.

Written reply on behalf ^{of} respondent No.3 not submitted.

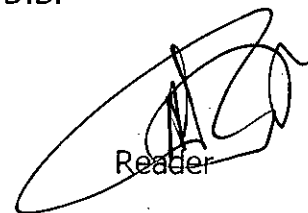
The instant appeal is posted to D.B for rejoinder and arguments on 30.10.2020.



(Mian Muhammad)
Member(E)

30.10.2020

Due to public holiday, the matter is adjourned to 31.12.2020 for arguments before the D.B.



Reader

22.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Muhammad Tariq, Assistant for respondents No. 1 & 2 present. Comments on behalf of the said respondents have already been furnished. Nemo for respondent No. 3.

Fresh notice be issued to respondent No. 3 for submission of requisite reply/comments on 27.02.2020 by way of last chance.


Chairman

27.02.2020

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for respondent present.

Reply on behalf of respondent No. 1 & 2 already submitted. None present on behalf of respondent No.3 or submitted written reply/comments; therefore, notice be issued to the respondent No.3 by way of last chance. To come up for written reply/comments on 07.04.2020 before S.B


(Hussain Shah)
Member

07.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 30.06.2020 for the same. To come up for the same as before S.B.


Reader

14.10.2019

Nemo for the parties.

Fresh notices be issued to appellant/learned counsel as well as respondents. To come up for written reply/comments of the respondents on 14.11.2019 before S.B.


Chairman

14.11.2019

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

Learned AAG seeks time to contact the respondents and submit the reply/comments on the next date. Adjourned to 13.12.2019 on which date the requisite reply/comments shall positively be furnished.


Chairman

13.12.2019

None present on behalf of the appellant. Mr. Muhammad Sharif, ADEO on behalf of respondents No. 1 & 2 alongwith Mr. Kabirullah Khattak, Additional AG present. Representative of respondents No. 1 & 2 submitted written reply. The same is placed on record. Neither written reply on behalf of respondent No. 3 submitted nor his representative is present, therefore, notice be issued to respondent No. 3 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Case to come up for written reply/comments on behalf of respondent No. 3 on 22.01.2020 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

16.08.2019

Counsel for the appellant Shakeela Masih present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as Primary School Teacher. She was imposed major penalty of compulsory retirement vide order dated 21.03.2018 on the allegation of absence from duty. The appellant filed departmental appeal on 16.05.2018 which was not responded hence, the present service appeal on 24.05.2019. Learned counsel for the appellant further contended that neither any absence notice was issued to the appellant nor any advertisement of her absence was published in newspaper. It was further contended that neither charge sheet, statement of allegation was served upon her nor any regular inquiry was conducted therefore, the impugned order is illegal and liable to be set-aside. It was further contended that though there is some delay in departmental appeal as well as in service appeal but the appellant has filed application for condonation of delay.

The contention raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 14.10.2019 before S.B.

Appellant Deposited
Security & Process Fee

16/8/19


(MUHAMMAD AMIN KUNDI)
MEMBER




Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____

692/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/05/2019	<p>The appeal of Mst. Shakeela Masih presented today by Naila Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;">  REGISTRAR 24/5/19 </p>
2-	27/05/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>26/06/19</u></p> <p style="text-align: right;">  CHAIRMAN </p>
	26.06.2019	<p>Tanveer husband of the appellant on behalf of appellant present and seeks adjournment as learned counsel for the appellant is indisposed. Adjourn. To come up for preliminary hearing on 16.08.2019 before S.B.</p> <p style="text-align: right;">  Member </p>

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A. 692 /2019

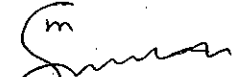
Mst. Shakeela Masih

VERSUS

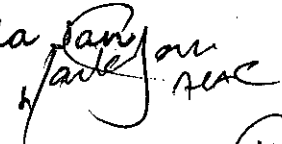
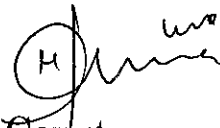
The Director Education FATA and others

INDEX

<i>S#</i>	<i>Description of Documents</i>	<i>Annex</i>	<i>Pages</i>
1.	Grounds of Appeal.		1-5
2.	Affidavit.		6
3.	Condonation of Delay		7-8
4.	Addresses of Parties.		9
5.	Copies of the medical prescriptions	"A"	10-16
6.	Copy of the order Dated 21/03/2018 and applications.	"B & C"	17-19
7.	Copy of departmental appeal	"D"	20
8.	Copy of order	"E"	21-22
9.	Wakalatnam		23


Appellant

Through

Naila Farooq
& 
Huma Khan 
Advocates, High Court
Peshawar.

Dated: 24/05/2019

D

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A. 699 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 802

Dated 24-5-2019

Mst. Shakeela Masih (Ex PST) at GGPS Gul
Mat Kor Khushali Tehsil Mirali. R/o Pir
Rehman Kot Mirali District Bannu.

-----*(Appellant)*

VERSUS

- ✓1. The Director Education FATA, FATA Secretariat Peshawar.
- ✓2. Agency Education Officer North Waziristan Tribal District/ District Education Offices North Waziristan Newly created District.
3. Agency Account Office North District Waziristan at Miran Shah.

-----*(Respondents)*

Filed to-day

Registrar,

24/5/19

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT, 1974 AGAINST THE ORDER DATED
21/03/2018 BY WHICH THE APPELLANT WAS
IMPOSED MAJOR PENALTY OF
COMPULSORY RETIREMENT AND IN-
ACTION OF THE RESPONDENTS ON
DEPARTMENTAL APPEAL OF THE
APPELLANT**

PRAYERS:-

**ON ACCEPTANCE OF THE INSTANT APPEAL
THE IMPUGNED ORDER DATED 21/03/2018,
MAY KINDLY BE SET ASIDE AND THE
APPELLANT MAY KINDLY BE REINSTATED
INTO SERVICE WITH ALL BACK BENEFITS.**

Respectfully Sheweth,

The appellant submits as under:-

1. That the appellant was appointed as PST and since her appointment the appellant performed her duty with great zeal, zeast and to the entire satisfaction of the Respondents.
2. That during performance of duty the appellant fell ill. There was no one to communicate leave application of the appellant to highups. Thus the appellant remained under treatment in various Hospitals at Kohat, Peshawar, Bannu Districts due to which the appellant could not continue her duties. (Copies of the medical prescriptions are annexed as annexure "A").
3. That salary of the appellant was stopped by the Respondents so the appellant submitted applications for release of the same and there the appellant came to know that without any charge sheet, show cause notice, and regular inquiry the appellant was imposed major penalty of

compulsory retirement. (Copy of the order dated 21/03/2018 and applications are annexed as annexure "B&C")

4. That feeling aggrieved from the same the appellant filed a departmental appeal, against the impugned order and on the verbal assurances for reinstatement by the Respondents, the appellant waited for the same however no order has been passed/communicated to the appellant hence filling the instant appeal. (Copy of the Departmental appeal is annexed as annexure "D")

GROUND:-

- A. That the impugned order is against law, rules. Principles of Natural justice hence void-ab-initio not sustainable in the eyes of law.
- B. That the absence of the appellant is not willful but due to illness which does not amount to misconduct hence the impugned order is liable to be set aside.
- C. That no charge sheet, statement of allegation or show cause notice has been issued/served upon the appellant.

D. That from the letter NO. 5219-25AEO/NWA, Dated 17/01/2018 issued by Respondent NO.2 to Respondent No.3 showed that even before the issuance of the impugned order the appellant was shown to be compulsory retired which alone is sufficient to declare the impugned order as a void order. **(Copy of the order is annexed as annexure "E")**

E. That the absence is not willful but due to illness which is already in the knowledge of the Respondents and is evident from the report of meeting held on 16/10/2018 in which the Respondent have treated the compulsory retirement into medical retirement which is sufficient evidence that the absence is not willful hence does not constitute misconduct.

F. That no regular inquiry was conducted nor did any opportunity of defense has been provided hence condemned unheard.

G. That no witness has been examined nor did opportunity of personal hearing have been provided to the appellant.

H. That even till date the appellant is ill however the inquiry officer did not bother to inquiry about the illness from the concerned Hospitals,

5

even the Respondents failed to take notice of the illness of the appellant.

I. That the appellant has not been provided right of fair Trial as guaranteed by article 10-A of the constitution of Islamic Republic of Pakistan 1973.

J. That since the impugned order the appellant is jobless.

K. That the appellant seeks permission to adduce other grounds during Arguments.

It is, therefore, most humbly prayed on acceptance of this appeal may kindly be accepted as prayed for in the heading of the appeal.

Any other relief not specifically asked for may also graciously be extended in favour of the appellant in the circumstances of the case.

Through

Sumar
Appellant

Naila Jan

&

Huma Khan

Advocates, High Court
Peshawar.

Dated: 24/05/2019

NOTE:-

As per information of my client no such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

Naila Jan
Advocate

6

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

S.A _____/2019

Mst. Shakeela Masih

VERSUS

The Director Education FATA and others

AFFIDAVIT

I, Mst. Shakeela Masih (Ex PST) at GGPS Gul Mat Kor Khushali Tehsil Mirali. R/o Pir Rehman Kot Mirali District Bannu, do hereby solemnly affirm and declare that all the contents of the **accompanied appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.


DEPONENT

Identified By:


Naila Jan

Advocate High Court
Peshawar.


ATTESTED
IRFAN ULLAH ADVOCATE
NOTARY PUBLIC

2

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A. _____/2019

Mst. Shakeela Masih

VERSUS

The Director Education FATA and others

ADDRESSES OF PARTIES

APPELLANT.

Mst. Shakeela Masih (Ex PST) at GGPS Gul Mat Kor Khushali Tehsil Mirali. R/o Pir Rehman Kot Mirali District Bannu.

RESPONDENTS

1. The Director Education FATA, FATA Secretariat Peshawar.
2. Agency Education Officer North Wazirstan Tribal District/ District Education Offices North Wazirstan Newly created District.
3. Agency Account Office District North Wazirstan at Miran Shah.

Through


Appellant


Naila Jan

&

Huma Khan

Advocates, High Court
Peshawar.

Dated: 24/05/2019

8

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A _____/2019

Mst. Shakeela Masih

VERSUS

The Director Education FATA and others

APPLICATION FOR CONDONATION OF DELAY

RESPECTFULLY SHEWETH:-

Application submits as under.

1. That the above mentioned appeal is filing before this Hon'ble Court in which no date is fixed for hearing so far.
2. That after filing the departmental appeal the appellant was assured time and again that the departmental appeal will be decided soon therefore the appellant was under the impression that the same will be accepted that's why a few days delay accrue and filling this appeal which is condonable in the entrust of justice on the following grounds.

GROUND:

- A. That the impugned order is void order so no limitation runs against void order.

B. That rights of the appellant is attached with the instant appeal.

C. That there are number of precedents of Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

It is therefore requested that the limitation period (if any) may kindly be condone in the interest of justice.


Appellant

Through

Naila Jan

&

Huma Khan

Advocates, High Court
Peshawar.

Dated: 24/05/2019



OUTPATIENT DEPARTMENT (OPD)

Lady Reading Hospital
Medical Teaching Institution,
Peshawar - PAKISTAN

Appointment Time : 09:16

Amount Paid : 20

Invoice No : K02180987922

Invoice Date : 16-APR-18 09:03:57

MRNO : K0200002590982

Name : SHAKEELA BIBI

Father / Husband Name : SUNEEL ""

Gender : Female

Age : 35 Year(s)

District : Peshawar

Visit Type : REGULAR

Clinic : SKIN FEMALE

Room No : 35

Operator : ZUBAIR AHMAD

Counter : MAIN OPD

Complaints:

Rx -

Jab Deltacortril
(٣ ڀيرا) 3 + 3 5mg

(٣ ڀيرا) 2 + 2

(٣ ڀيرا) 2

١ ڀيرا 1

Findings:

- Jab Imuran

(١ ڀيرا) ١ ڀيرا 1 + 1 50mg

- Jab Drate 70mg

١ ڀيرا (١ ڀيرا) 1

- cap Zolbi 40mg

(١ ڀيرا) 1 ڀيرا 1

- Jab Galsan-D

(١ ڀيرا) ١ ڀيرا 1

cap Triazolam 150mg

(٣ ڀيرا) ١ ڀيرا 1

- Nistat oral drops

١ ڀيرا ١ ڀيرا 1

Signature: Kam-B

Investigations:

Free
Flora

Referred to
Endocrinology OPD

Diagnosis:

P. vulgaris
in Remission.

Next Visit:

Consultant Name:

Signature:

Uncorrected level

many mg.
TDS

Eye sight weak

Non-compliant

lose Motion

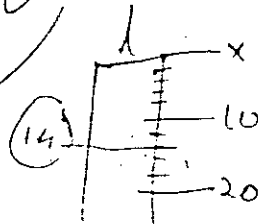
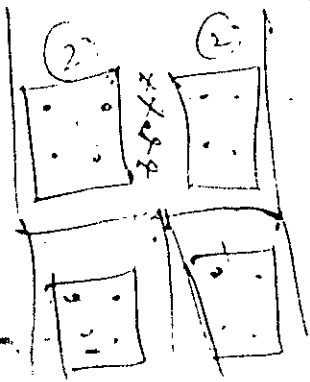
Diabetic / see to avoid
use - cushing syndrome
lathogenic

R. Tail Chlorophyll
(in 2000)

May need
work up
for cushing effects

Day mixed with
20
20
(in 2014)

D.E



20 = 20
14 = 14

20 20 20

2
2
2

80-130 2
80-180 2



①
ACCIDENT & EMERGENCY DEPARTMENT
Lady Reading Hospital
Medical Teaching Institution,
Peshawar - PAKISTAN

Amount Paid : 20
Invoice #: K02171697245
Invoice Date : 14-SEP-17 19:30:30

MR No : 20170001792301 Name : SHAKEELA
Gender : Female Age : 35 Year(s) District : Peshawar
Father / Husband Name : UNKNOWN

Complaints:

Admitted to Emergency Department : EMERGENCY
Admitted by : MUHAMMAD BIN C Counter : EMERGENCY

Findings:

(Refused Admission)

C/c
 → Multiple recurrent erosions all over the body + oral cavity erosions along whitish coated Tongue; Multiple erosions on scalp + Dystrophic Nails
 → History of flaccid blisters (suppurating in less than 24 hours)

Investigations:

→ CBC
 → LFT's

Diagnosis:

P. Vulgaris

skin care

Next Visit: _____ Consultant Name: _____ Signature: _____

→ Tab Delecocon Syng

- 861 - 6+6
- 861 - 6+4
- 861 - 4+4
- 5,4 - 3+3

→ Tab Dalfan D
(5,6) nis, 3

→ Tab Drate
(862) nis, 3

→ Tab Zolamix
(861) 0, 2 nis, 3

→ Fudic - Dintmed
nis, 3, 0, 2 nis, 3

→ Liquid Paraffin
nis, 3, 0, 2 nis, 3

Daktarin
 nis, 3, 0, 2 nis, 3
 nis, 3, 0, 2 nis, 3

PLAN for ^{trans} on next visit

Associate Professor

Dr. Muhammad Majid Paracha

MBBS, MCPS, FCPS, (Dermatology)



ایسوسی ایٹ پروفیسر

ڈاکٹر محمد ماجد پراچہ

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس (ڈرماٹالوجی)

Skin Unit

PMDC 6205N

Lady Reading Hospital Peshawar

سکن یونٹ لیڈی ریڈنگ ہسپتال پشاور

Pt's Name

Shakela

Age

40y

Sex

F

Date

19 MAY 2018

It is certified that Ms. Shakela Marik was suffering from pemphigus vulgaris. She is under continuous treatment.

She is now in Recovery & is stable. No Active Lesions. She can resume her duties.

Associate Professor
DR. MOHAMMAD MAJID PARACHA
MBBS, MCPS, FCPS (Dermatology)
Dept. of Dermatology
MTI/LRH Peshawar.

COPY ATTESTED

Muzafar Hayer Hanjash
Advocate / Notary
Public Kohat

Not Valid For Court

0334-8267879 بابو: نمبر کیلئے
0332-5636261
0333-3803637: کمال حسین
0312-0920694: کوہاٹ 0308-5313515: پشاور نمبر کیلئے
کرہ نمبر 28 فرنیچر میڈیکل سنٹر تیراہ بازار کوہاٹ بروز اتوار صبح 8 تا 1 بجے دن
پشاور کلینک: B-11 خٹک میڈیکل سنٹر ڈبگری گارڈن پشاور نمبر کیلئے: 0308-5313515 کوہاٹ: 0312-0920694

اس کارڈ کو احتیاط سے رکھیں

دوبارہ معائنہ کے لئے O.P.D
سوائے جمعرات اتوار (1) ماہ --- دن بعد تشریف لائیں

DEPARTMENT OF
DERMATOLOGY

Mitefree Lotion.
(Permethrine + Sulphur)

(B)
DEPARTMENT OF DERMATOLOGY
POSTAGE GRADUATE MEDICAL INSTITUTE
MTI
LADY READING HOSPITAL PESHAWAR

DISCHARGE SLIP

Associate Professor & Incharge

Dr. Sahibzada Mahmood Noor
MBBS, FCPS (Derm)

Associate Professor

Dr. Mohammad Majid Paracha
MBBS, MCPS, FCPS (Derm)

MEDICAL OFFICERS

Dr. Ikram Afridi
Dr. Wali Khan
Dr. Mustafa Kamal
Dr. Kamran Durrani
Dr. Nadia Ashiq
Dr. Mohammad Zubair Bhatti

TMO'S

Dr. Ashfaq
Dr. Zabia
Dr. Nasma Noor
Dr. Shawana
Dr. Farman
Dr. Shahid Khan
Dr. Jahangir
Dr. Imran
Dr. M Faheem
Dr. Sassi
Dr. Farhad

Name of Patient: Shakeela

Age: 35yrs Sex: female Adm No: 525/36 Bed No: F-8

Admitted on: 03/10/17 Discharge on: 10/10/17

Address: Danoo

Diagnosis: Pemphigus Vulgaris

Prepared By: Lordi

Checked By: Dr. Nam

FOLLOW UP

16

Smg Doplet - 3 - ① ① ^{100%} _{100%}

Cap Zolanix 150mg ② ② ^{100%} _{100%}
(8/6) ① ①

Tab Depiril 50mg ⑩ ⑩ ^{100%} _{100%}

Tab Bevidox 150 ③ ③

✓ Tab Deltacortil 5mg ⑦ ⑦ ^{100%} _{100%}
⑩ ⑩

0.6 ① ⑥ - ⑥

0.6 ① ⑤ - ⑤

0.6 ① ④ - ④

0.6 ① ③ - ③

0.6 ③ ③ - ②

0.6 ③ ② - ②

0.6 ③ ② - ①

0.6 ③ ① - ①

0.6 ③ ① - ①

0.6 ③ ①/2 - 0

Wage

Restogen-M
(Tribulus Terrestris)



17

OFFICE OF THE AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY AT MIRAN SHAH
Ph.NO.0928313045

10/02
B

NOTIFICATION

1. *WHEREAS* the AAEO Circle/Inquiry Officer reported the absence of Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084
2. *AND WHEREAS* meanwhile it was also reported that Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal 50226084 has been absence.
3. *AND WHEREAS* Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 was served with Show Cause/willful Absence Notice vide this office No: 601-606 dated: 07/02/2018 and published in daily Newspaper on 20/02/2018 for being willful absence without proper permission of the competent authority. Dispensing with enquiry as envisaged in section 7 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011.
4. *AND WHEREAS* Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 for personal hearing in response to the Show Cause served upon her and she was failed in her reply.
5. *AND WHEREAS* the Agency Education officer in his capacity as the competent Authority after having examined the record conducting a deep and detailed scrutiny of papers from all the relevant aspects is of the view that the charges of willful and unauthorized absence of Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 has been proved and is accused of misconduct under the rules.
6. **NOW THEREFORE** In exercise of the powers conferred under Rules 4 (b) ii of Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011, the competent Authority, the Agency Education Officer North Waziristan Agency, is pleased to impose major penalty of "Compulsory Retirement From Service" upon Mst: *Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih* bearing personal No: 50226084 North Waziristan Agency Miranshah with immediate effect on account of her willful absence.

Attested
Namika

(HABIBULLAH)
Agency Education Officer,
North Waziristan Agency

Endst: No.2077-83, Dated 21/03/2018.

Copy forwarded to the:

1. Director Education FATA, FATA Secretariat Peshawar.
2. Political Agent North Waziristan Agency at Miran Shah
3. Head Quarter 7-Division Camp Area Miranshah.
4. Agency Accounts officer North Waziristan Agency at Miran Shah for stoppage pay of the official
5. PS to Additional Chief Secretary FATA for perusal of the Additional Chief Secretary FATA
6. PS to Secretary SSD FATA for perusal of the Secretary SSD FATA
7. AAEO concerned for entry in his service book
8. Accountant local office for stoppage of his pay forthwith.
9. Official concerned

Agency Education Officer
North Waziristan Agency



OFFICE OF THE AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY.

No. 4954 AEO/NWA,
Dated 13/07/2018.

To: The Director Education,
FATA KPK Peshawar.

Subject: APPLICATION FOR RELEASE OF PAY.

Memo;

Reference your letter No. 9714 dated: 11/7/2018, it is submitted for your kind information that Mst; Shakeela Masih PST was working at GGPS Gulmat Kot Khushali Tehsil Mirali. During various surprise visits of AAEO circle concerned as well as on the complaint of Land Donor she has been found absent since long from Government Duty. This office has been issued Explanation with the direction to assume her duty but she failed every time at last her pay was stopped, she produce various prescription from Medical Officer. At last this office has issued Show Cause Notice to the teacher concerned vide this office No: 601-06 dated; 07/01/2018, with the direction to submit reply regarding willful absence from Govt: Duty but she failed. This office has published in daily Newspaper on 20/02/2018 absence Notice with the direction to assume duty but she failed in the prescribed period of time which was intimated in daily Newspaper. After completion of all the codel formalities the teacher concerned was compulsory retired from Govt; Service vide this office No: 2077-83 dated: 20/03/2018. Now she has submitted an application that her health is ok and she is in a position to perform duty regularly.

So you are requested to consider her application on a humanitarian basis please.

Handwritten signature/initials

Handwritten signature
Agency Education Officer,
North Waziristan Agency

12-7-18

حضرت جناب ڈاکٹر لبرائن پشاور ایجوکیشن ٹرଷٹ
Amma C
جناب عالی ا

موجودہ ایس ایس سی جاتی ہے۔ کہ گزشتہ چند ماہ میں یہ
ہی۔ ہیں اب میں بائبل کلاس میں اور اپنی
جاری دیکھ سکتی ہوں۔ آپ کا خیال ہے ایس
جاتی ہے کہ مجھے میری ڈیوٹی پر بحال کیا جائے

الغرض

سائلہ سید صاحبہ سیر رحمان کوٹ میر علی
بی۔ بی۔ سی

Forwarded to DEPTA
for favourable consideration please.

12/7/08

صدر ایف ایف اے کے رکن ایف ایف اے کی طرف سے
صدر ایف ایف اے کے رکن ایف ایف اے کی طرف سے

درخواست - مرانہ وفد زعت حالی و تنخواہ

صدر عالی گزشتہ سے کہ سائلہ سکتی جلالت کی

وجہ سے ⁷⁶محلہ عمرہ کی دن ڈیوٹی سے غیر حاضر ہونے
کی وجہ سے صدر "ریشٹریٹر کر دیا گیا ہے -

صدر عالی! سائلہ تین چھوٹے بچوں کی والدہ ہے اور بیماری

کی وجہ سے ڈیوٹی پر نہ جاسکتی چونکہ سائلہ کی ڈیوٹی G.P.S Gultmat

کے قریب ہے اور مرانہ سے دور ہے اور سائلہ کو بائیں سے کئی سہولت

دور ہے چھوٹے بچوں اور بیماری کی وجہ سے کئی بار مرانہ میں درخواستیں
کئی دن ملے مگر کوئی شہزادی نہ ہوئی میری بیماری کی اطلاع وغیرہ

کھیلے درخواستیں کچھ نہ مانگی نہ ذرا سوائے نذر لیں ڈاک

جو کہ وقت پر اطلاع دینے کی کوشش کی مگر صدر اطلاع صدر ایف ایف اے
وجہ غیر حاضر ہونے سے معلوم ہو گیا کہ ڈاک کئی روز سے درخواست

نہیں ملی ہے میری بیماری کی حالت اور بچوں کو مد نظر رکھتے ہوئے
ایک مجبور انسان ہے۔ سوئے رسم فرمائیں اور میری نوکری

و تنخواہ حال کرنے کے احکام جاری فرمائیں آئندہ سائلہ
کے قسم کے شکایت کا موقع نہ دے گی -

طالعہ

شکریہ
اللہ اعلم
پ.ت.ع
DD(S) 1005



21

(E)

**OFFICE OF THE AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY.**

No. 5219-25 AEO/NWA,

Dated 17/02/2018.

To

The Agency Account Officer,
North Waziristan Tribal District.

Subject: **REMOVAL FROM SERVICE.**

Memor:

It is submitted that the following teachers have been removed from Govt. Service due to long absence after observing all codel formalities. The inactive proformas have already been sent to your office; however you are once again requested to check the following names in Payroll System.

S.No	Personal No	Name	School	Remarks
01	50233898	Zenat Bibi PST	GGPS Taj Ali Kot	Removed from Service
02	50216169	Kalsoom Bibi PST	GGPS Nekam Kot	Removed from Service
03	50240661	Zahora Begum PST	GGPS Gul Hawas Kot	Removed from Service
04	50216292	Zinat Gul PST	GGPS Mir Kazam Kot	Removed from Service
05	50225376	Zartaj Begum PST	GGPS Gul Wali	Removed from Service
06	50225770	Shahida Kalsoom PST	GGPS Mir Sahib Gul Kot	Removed from Service
07	50188092	Salma PST	GGPS Nekam Kot	Removed from Service
08	50216282	Salma Begum PST	GGPS Sher Nawaz Kot	Removed from Service
09	50203272	Shabnum PST	GGPS Pashum Razoni	Removed from Service
10	50225880	Rashid Bano PST	GGPS Akram Kot	Removed from Service
11	50246916	Abida Farooq PST	GGPS Sarfaraz Kot	Removed from Service

Handwritten signature and text:
NWA
17/02/2018

Handwritten signature:
Haji

12	50215990	Akhtar Numana PST	GGPS Dil Nawaz	Removed from Service
13	50213215	Baswari Begum PST	GGPS Gulmat Kot	Removed from Service
14	50213341	Gul Shan Ara PST	GGPS Taj Ali Kot	Removed from Service
15	50215847	Kausar Shabana PST	GGPS Dil Nawaz	Removed from Service
16	50262159	Memoon Akhtar PST	GGPS Saiful Kot	Removed from Service
17	50232331	Nusrat Kalsoom PST	GGPS Muhammad Azam	Removed from Service
18	50238909	Parveen Begum PST	GGPS Sher Nawaz Kot	Removed from Service
19	50227131	Bibi Naheeda PST	GGPS Kajeer Kot	Removed from Service
20	50227131 <i>50227131</i>	Dilshad Begum PST	GGPS Gul Dad Kot	Removed from Service
21	50215327	Mehnaz PST	GGPS Gul Zaray Kot Garyum	Removed from Service
22	50226084	Shakila Masih PST	GGPS Gul Mat Kot	Compulsory Retired from Service
23	50232165	Malmooda Saleem PST	GGPS Gul Shin Kot	Compulsory Retired from Service

S.H.
(Habib Ullah Khan)
Agency Education Officer,
North Waziristan Tribal District.

Even No & Date

Copy to the:

1. The Director Education FATA KPK Peshawar.
2. The Deputy Commissioner North Waziristan Tribal District at Miranshah.
3. Head Quarter 7-Division Camp Area Miranshah.
4. AAEO circle concerned.
5. Dealing Clerk of up gradation of this office.
6. Accountant Primary Education of this office.

[Signature]
Agency Education Officer,
North Waziristan Tribal District.

N.D.I.B

وکالت نامہ

بعدالت صائب کرسٹینس ٹریڈنگ سٹور

منجانب ایڈووکیٹ مسٹر سید محمد سعید بنام شمیم قاسم
تاریخ 24/5/2019

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی وجوہد ہی بمقام سٹور کے لئے

نانکہ جان اینڈ ہما خان ایڈووکیٹس ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو بروعدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے کسی اور جگہ ساعت ہونے یا بروذ قہطیل یا پکھری کے کسی اور جگہ ساعت ہونے یا بروذ قہطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچنے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا اختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرددہاشی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختیار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزوی کارروائی کے واسطے یا بصورت اپیل، اہیل کے واسطے کسی دوسرے وکیل یا پیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختیار نامہ لکھ دیا تاکہ سند رہے مورخہ 24/5/2019۔ مضمون مختیار نامہ من لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

ATTESTED & ACCEPTED

نانکہ جان اینڈ ہما خان ایڈووکیٹس پشاور ہائی کورٹ پشاور

محمد سعید

BEFORE THE HONRABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

APPEAL NO.692/2019

MST. SHAKILA MASIH

VERSUS

DIRECTOR OF EDUCATION FATA, & OTHERS

INDEX

S.NO	DISCRIPTION OF DOCUMENTS	ANNEXTURE	PAGES
1	COMMENTS		1-3
2	AFFIDAVITE		4
3	AUTHORITY LETTER		5
4	SHOW CAUSE NOTICE	ANNEXURE-A	6
5	INQUIRY COMMITTEE	ANNEXURE- B	7-10
6	COPY OF THE COMPULSORY RETIREMENT	ANNEXURE-C	11
7	COPY OF MINUTES OF THE INQUIRY COMMITTEE FATA	ANNEXURE-D	12-14
8	COPY OF THE PAGES OF DISPATCH REGISTER	ANNEXURE-E	15-16
9	COPY OF THE LETTER OF RESPONDENT NO. 2	ANNEXURE-F	17
10	COPY OF MINUTES OF THE INQUIRY COMMITTEE FATA	ANNEXURE-G	18-20


ASSISTANT DISTRICT EDUCATION OFFICER
NORTH WAZIRISTAN TRIBAL DISTRICT

D

BEFORE THE HONRABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL. NO.692/2019

Mst. Shakila Masih (Ex-PST) at GGPS Gul Mat kot Khoshali Tehsil Mir Ai R/O Pir Rehman
Kot Mir Ali District North Waziristan-----Appellant

VERSUS

1. DIRECTOR OF Education FATA, FATA Secretariat, Peshawar.
2. District Education Officer North Waziristan Tribal District.
3. District Account Officer North Waziristan Tribal District.

-----Respondents

Comments on behalf of Respondent NO. 1 & 2

Respectfully Sheweth.

Mushtaq Maryam
Asstt. District Education Officer
North Waziristan Tribale Distt.

Preliminary Object

1. That the appellant got no cause of action, locus standee to file the instant appeal
2. That the appellant has not come to this honorable court with clean hands.
3. That the appellant is stopped by his own conduct to bring the instant appeal.
4. That the appellant has concealed material facts from the Honorable Court.
5. That the appellant is not maintainable in the present form.

-----Respondents

On facts

1. Correct to the extent that the petitioner was appointed as PST teacher but her performance as a teacher was not satisfactory.
2. Incorrect. Being ill and admitted in various hospitals, she could avail medical leaves through submitting an application to her department.
3. Incorrect. The appellant was served with show cause notice on her willful absence from duty vide this office No. 601-606 dated 07. 02. 2018 and published in a national daily on 20.02.2018 (**Copy of the show cause notice is attached as Annexure-A** Dispensing with enquiry as envisaged in section 7 of the Khyber pakhtunkhwa Government servant Efficiency and Discipline Rule-2011(**Copy of the enquiry committee for checking the show cause notices is attached as Annexure-B**), where the petitioner is mentioned on S.# 32. In the stipulated period, the petitioner failed to respond to the show cause notice of

the respondent department. As a result, the then Agency Education Officer in his capacity as a competent authority after having examined the record conducting deep and detailed study of papers from all the relevant aspects was of the view that the charges of willful and unauthorized absence of the petitioner had been proved and is accused of misconduct Under the rule. And so, in the exercise of the power conferred under Rule-4(b) ii of Khyber pakhtunkhwa government E&D rule 2011, the Agency education imposed major penalty of compulsory retirement from service upon the petitioner on 21.03.2018 **(Copy of the compulsory retirement is attached as Annexure-C)**. After that the petitioner submitted an application to the respondent No. 2 and prayed that her health was ok then and she was in a position to perform her duty regularly, the respondent No.2 wrote a letter to the Director Education FATA for his consideration over the plea of the petitioner. The Director Education constituted a high level committee to consider the case of the petitioner. In the recommendation, the committee stated that the compulsory retirement order of 21.03.2018 might be ordered as intact and the DEO might be directed to provide her benefit of retirement expeditiously as permissible under the rule **(Copy of the minutes of the inquiry committee is attached as Annexure-D)**

4. Keeping in view the above facts, the appeal may kindly be dismissed on the following ground.


Masih
Masih
 Asstt. District Education Officer
 North Waziristan Tribale Distt.

Grounds:


- A. Incorrect. The impugned order is not against the law, rule and principal of natural justice. Hence it is sustainable in the eyes of law.
- B. Incorrect. If the absence of the appellant was not willful, she could submit medical leave application to her department.
- C. Incorrect. Show cause notice has been served upon the appellant on 01.01.2018 and published in the National Daily on 20.02.2018.
- D. Incorrect. The mentioned letter has never been issued by the respondent No. 2 to respondent-No.3. It is totally fake. **(Copy of the page of the dispatch register is attached as Annexure-E)**
- E. Incorrect. If the appellant was ill, she should have informed the respondent department. Ironically, just after the issuance of the impugned order, on the application of the appellant, the respondent No. 2 wrote a letter to the respondent No.1 i.e. DE FATA to consider the application of the appellant, as she is ok then and she liked to continue her duty as a teacher. **(Copy of the letter of respondent No. 2 is attached as Annexure-F)**. And in response to the letter, the DE. FATA constituted a high level committee to check the appeal of the appellant. As a result, the committee endorsed the impugned order of 21.03. 2018.
- F. Incorrect. Inquiry committee was constituted to check a see whether the absentees have reported to the department or not. **(Copy of the committee is attached as Annexure-G)**
- G. Incorrect. A show cause notice was served upon the appellant and within a stipulated period, the appellant failed to report to the respondent department.
- H. Incorrect. The respondent department wrote a letter to respondent No.1 i.e. the D E FATA and stated that the appellant, Mst. Shakila Masih wished to continue her duty as a teacher as she is ok and fees healthy. In the response to that letter, the high level committee in Peshawar when asked the appellant, if she was interested in her service, in case she is reinstated. She showed negligence **(Copy of the minutes is attached as annexure-D)**

- I. Incorrect. Compulsory retirement of the appellant was just according to law and rules.
- J. Incorrect. The appellant is on compulsory retirement and she may be taking legal financial advantages.
- K. The respondents seek permission of the Honorable Tribunal to put forward other points during arguments.

Respondent No.1


Director Education
Newly Merged districts KPK


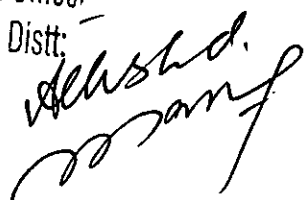
Respondent No. 2


District Education Officer
North Waziristan Tribal district

AFFIDEVIT

I, Mr. Muhammad Sharif ADEO Education Office North Waziristan Tribal District do hereby solemnly affirm and declare that all the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal




 DEPONENT
 Asstt. District Education Officer
 North Waziristan Tribie Distt.


(5)

AUTHORITY LETTER

This office has the honor to state that Mr. Mohammad Sharif has been serving in the District Edu: Office as an ADEO. He has been given the authority to attend any kind of court case. So he may be considered as representative of the District Edu: officer, N.W.T.D

*Muhammad
Sharif*
Asstt. District Education Officer
North Waziristan Tribal Distt.

[Signature]
DISTRICT EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY

(A)

NOTICE (1) - THE POST OFFICE IS NOT RESPONSIBLE FOR LOSS OR DAMAGE IN THE CASE OF INLAND REGISTERED ARTICLES, UNLESS THEY ARE ALSO INSURED.

Agency Education Office
North Waziristan Agency
PHONE NO. 0928-313045

No: 601-606

Dated: 07/02/2018.

②
②

Show Cause/Willful Absence Notice.

You, Mst: Shakila Maasih PST Personal No: 50226084 GGPS Gulmat Kot Khushali Tehsil Mirali, with charge sheet/ show cause of Education Department North Waziristan Agency Miranshah has been absent from their respective schools without proper permission of the competent authority w.e.f from long period as reported by AAEO Circle concerned, who reported the same for disciplinary proceedings to the undersigned.

I, Mr. Habib Ullah the Agency Education Officer North Waziristan Agency Miranshah, in the capacity of the competent authority do hereby issue this notice, directing you to appear before the under signed for personal hearing within 7 days, not more than 15 days of issuance of this notice, failing which another willful absence notice will be published in two leading news papers. In case you again failed to show cause of your willful absence one of the major penalty as specified in section 4 of KP Govt: Servants (Efficiency & Discipline) Rules 2011 will be imposed upon you

Mst: Shakila Maasih PST
GGPS Gulmat Kot Khushali

(Habib Ullah)
Agency Education Officer,
North Waziristan Agency,
(The competent Authority)

Even No: & Date:

Copy for information and necessary action to:-

1. The Director Education FATA Peshawar.
2. The Political Agent North Waziristan Agency Miranshah.
3. Head Quarter 7-Divison Camp Area Miranshah.
4. AAEO (C) local office
5. School Concerned.
6. KPO of this office.

Waleed
Asstt: District Education Officer
North Waziristan Tribel Distt.

Agency Education Officer,
North Waziristan Agency,
EO

The Committee checked the show cause issued to various teachers male & female and comments are as under: Dated: 14-03-2018.

S.No	Name & Design:	School	Reply	Remarks
01	Shaheen CT	GGMS Bakhtali Kot Nauna Mirali	Replied that she was suffering from illness.	Directed to provide proper medical documents and her further duty may be verified.
02 ✓	Farah Bibi PST	GGPS Muhammad Nawaz Kot Razmak	Replied to the show cause notice and submitted undertaking to be regular in future.	Recommended one step/ scale degradation as a penalty and her further duty may be verified.
03	Sofia Shaheen PST	GGPS Adam Khan Kot Dossali	Replied to the show cause notice and submitted undertaking to be regular in future.	Her duty may be verified from the School if she is not found present then one increment may be deducted out of her pay as penalty.
04 ✓	Mehnaz Pari PST	GGPS Fazal Karim Dossali	Replied to the Show Cause notice and pretended that she had submitted leave application through AAEO (F) circle concerned.	Her leave application may be checked from the office record if leave is sanctioned then she may be exempted otherwise deduction of one increment as penalty may be imposed out of her monthly pay. Her further duty may be verified.
05 ✓	Bibi Zina PST	GGPS Fazal Karim Kot Dossali	Replied to the Show Cause notice and submitted undertaking to be regular future.	Recommended one step/ scale degradation as a penalty and her further duty may be verified.
06 ✓	Jamsheda TT	GGPS Fazal Karim Kot Dossali	Replied to the Show Cause notice and submitted undertaking to be regular future.	Recommended one step/ scale degradation as a penalty and her further duty may be verified.
07 ✓	Rukhsana Naz PST	GGPS Amir U Din Kot Razmak	Replied to the Show Cause and explained that the School was closed for winter vacation.	The school may be checked whether it is situated in winter vacation areas or not. If not then one increment deduction may be made out of her pay as penalty. Her further duty may be verified.
08	Nawroz Khan PST	GPS Nek Umar Kot Spinwam	Replied to the Show Cause notice and pretended that he was absent only on the visit day.	His further duty may be investigated, if he is not found present then one increment deduction as penalty is recommended.
09	Nadia Akhtar PST	GGPS Mir Qazan Dossali	Replied to the Show Cause notice and submitted undertaking to be regular in future.	Recommended one step/scale degradation as penalty. And her further duty may be verified.

*Asst. District Education Officer
North Waziristan Tribble Distt.*

10	Shazia Begum PST	GGPS Muzamil Kot Shewa	Replied to the Show Cause and explained that she was absent only for two days while construction work was in progress in the school.	School visit may be made and construction work may be checked if her statement is true then she may be exempted otherwise one increment deduction may be imposed as penalty.
11	Salma Gul PST	GGPS Gulat Khan Kot	Replied to the Show Cause notice and provided documents that she has been transferred to GGPS Abdul Hamid Kot Mirali on dated 19/09/2017.	Her attendance may be check at GGPS Abdul Hamid Kot Mirali if she is present then she may be exempted this time if not then one Step/scale degradation may be made as penalty.
12	Asia Bibi PTC	GGPS Gul Ismail Kot Garyum	Replied to the Show Cause notice and explained that the school was closed for winter vacation.	The school should be checked whether it is situated in winter vacation area or not. If not then one increment deduction may be imposed as penalty. Her further duty may be verified.
13	Reshma Khan PST	GGPS Muhammad Nawaz Kot Razmak	Replied to the Show Cause notice and explained that the school was closed for winter vacation.	The school should be checked whether it is situated in winter vacation area or not. It not then one increment deduction may be imposed as penalty. Her further duty may be verified.
14	Akbar Zuman PST	GPS Ali Janan Sarobi	Replied to the Show Cause notice and submitted undertaking to be regular in future.	His duty may be verified if he is found absent then one step/scale degradation as penalty is recommended.
15	Miss Ishrat PET	GGMS Arsala Jan Kot	Replied to the Show Cause notice that she is transferred to Sa rdar Ali Kot	Her transfer order may be checked from the office record. And her further attendance may be verified on Sardar Ali Kot.
16	Ashoora Bibi CT	GGMS Mir Sahib Gul Kot Mirali	Replied that she is performing duty regularly and that she is appointed on 23/02/2018.	The said teacher is appointed on dated 23/02/2018 she may be exempted this time.
17	Tehsina PST	GGPS Rabat Khan Mirali	Replied that she was absent only for few days, while suffering from illness.	Her duty may be verified if she is found present then she may be exempted.
18	Shagufta CT	GGMS Mir Sahib Gul Kot	Not yet replied.	

Waliullah
M. J. Khan
 Asstt. District Education Officer
 North Waziristan Tribale Distt.

B-3

19	Farzana PST	GGPS Noor Muhammad Kot Mirali	Not yet replied.	
20	Anwar Sultana PST	GGPS Noor Muhammad Kot Mirali	Not yet replied.	
21	Maryum Ali AT	GGMS Mir Sahib Gul Kot Mirali	Not yet replied.	
22	Noorun Nisa PST	GGPS Zawab Kot Ghulam Khan	Not yet replied.	
23	Najma PST	GGPS Sher Nawaz Kot Khushali	Not yet replied.	
24	Mehnaz Begum PST	GGPS Guldad Kot	Not yet replied.	
25	Bibi Salma PST	GGPS Mat Khuzai	Not yet replied.	
26	Zubida Ghani PST	GGPS Bakhtali Kot Mirali	Not yet replied.	
27	Farzana PST	GGPS Muhammad Nawaz Kot Miranshah	Replied that she was suffering from illness and provided Medical Documents.	Her duty may be verified if she is found absent then one increment deduction may be made out of her monthly pay.
28	Masahib Din PET	GMS Aba Khel Spinwam	Not yet replied.	
29	Nahid Islam PST	GGPS Muhammad Nawaz Kot	Not yet replied.	
30	Saima Rashid PST	GGPS Mazai Kot Mirali	Not yet replied.	
31	Nadia Khan PST	GGPS Gulmat Kot Khushali	Not yet replied.	
32	Shakila Masih PST	GGPS Gulmat Kot Khushali	Not yet replied.	
33	Karim Khan CT	GMS Aba Khel Spinwam	Not yet replied.	
34	Mati U Rehman AT	GMS Aba Khel Spinwam	Not yet replied.	
35	Gul Nar AT	GGMS Arsala Jan Kot Mirali	Replied that he is performing his duty regularly.	His duty may be checked if he is not found present then one increment deduction may be made out of his pay.
36	Fazal Nawaz PST	GPS Khan Faqir Kot	Not yet replied.	
37	Gulab PST	GGPS Multan Kot	Not yet replied.	
38	Daud Khan PTC	GPS Bango Kot	Replied that he is performing his duty regularly.	His duty may be checked if he is not found present then one increment deduction may be made out of his pay.
39	Naveeda Yasmin PST	GGPS Gul Zary Garyum	Replied that the school was closed for winter vacations.	Her school may be checked if the school is situated in the winter vacation zone then she may be exempted.
40	Asma PST	GGPS Saif Ali	Not yet replied	Not yet replied


Willis

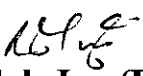
Asstt. District Education Officer
North Waziristan Tribal Distt.

B-4

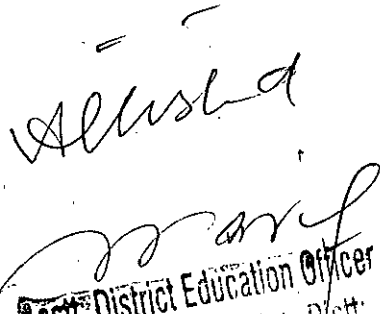
10

41	Jamsheda PST	GGPS Fazal Karim Kot	Not yet replied	Not yet replied	<i>Pauleh manoor</i>
42	Fawzada PST	GGPS Gul Manoor	Not yet replied	Not yet replied	
43	Khatim Bibi PST	GGPS Kajir Kot	Not yet replied	Not yet replied	
44	Mehmoda PST	GGPS Gul Shin Kot	Not yet replied	Not yet replied	


1- Sami Ullah Khan (V.P)
GHSS Eidak


2- Habib Ullah Jan (H.M)
GHS Tall


3- Noor Ullah Jan (AAEO)


Asst. District Education Officer
North Waziristan Tribe Distt.



OFFICE OF THE AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY AT MIRAN SHAH
Ph. NO. 0928313045

NOTIFICATION

1. WHEREAS the AAEO Circle/Inquiry Officer reported the absence of Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084
2. AND WHEREAS meanwhile it was also reported that Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 has been absence.
3. AND WHEREAS Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 was served which Show Cause/willful Absence Notice vide this office No: 601-606 dated: 07/02/2018 and published in daily Newspaper on 20-02/2018 for being willful absence without proper permission of the competent authority. Dispensing with enquiry as envisaged in section 7 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011.
4. AND WHEREAS Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 for personal hearing in response to the Show Cause served upon him and she was failed in her reply.
5. AND WHEREAS the Agency Education officer in his capacity as the competent Authority after having examined the record conducting a deep and detailed scrutiny of papers from all the relevant aspects is of the view that the charges of willful and unauthorized absence of Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 has been proved and is accused of misconduct under the rules.
6. NOW THEREFORE In exercise of the powers conferred under Rules 4 (b) ii of Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011, the competent Authority, the Agency Education Officer North Waziristan Agency, is pleased to impose major penalty of "Compulsory Retirement From Service" upon Mst: Shakila Masih PST GGPS Gulmat Kot Khushali Tehsil Mirali daughter of Saddiq Masih bearing personal No: 50226084 North Waziristan Agency Miran Shah with immediate effect on account of her willful absence.

Missed
Asst. District Education Officer
North Waziristan Tribel Distt.

Attested
Nami

(HABIBULLAH)
Agency Education Officer,
North Waziristan Agency

Endst: No.2077-83, Dated 21/03/2018
Copy forwarded to the:

1. Director Education FATA, FATA Secretariat Peshawar.
2. Political Agent North Waziristan Agency at Miran Shah
3. Head Quarter 7-Division Camp Area Miran Shah.
4. Agency Accounts officer North Waziristan Agency at Miran Shah for stoppage pay of the official
5. PS to Additional Chief Secretary FATA for perusal of the Additional Chief Secretary FATA
6. PS to Secretary SSD FATA for perusal of the Secretary SSD FATA
7. AAEO concerned for entry in his service book
8. Accountant local office for stoppage of his pay bothwith.
9. Official concerned

Agency Education Officer
North Waziristan Agency

نانہ جان ایند هما خان ایڈوکیٹس پشاور ہائی کورٹ پشاور

Missed



D-9

D-1

NO. _____ /
DATED _____ / _____ / 2018.

(D) 9

**MINUTES OF APPELLATE COMMITTEE REGARDING DISPOSAL OF
DEPARTMENTAL APPEALS.**

A meeting of the committee was held on 16/10/2018 at 11.00 AM in the office of Additional Director (Estab.) FATA in order to examine/scrutinize the appeals submitted by various appellants against the dismissal/removal order issued by Agency Education Officers on various grounds mentioned in the impugned orders. The following attended the meeting.

1. Additional Director (Estab) : Chairman.
2. Deputy Director (F/A). : Member.
3. Deputy Director (Colleges) : Member.

The Appellants were provided opportunity of hearing one by one keeping in view the Principles of natural justice. The committee after perusal of the record available and threadbare discussion on each issue unanimously agreed to submit the following recommendations for approval of the competent authority.

1. Shakeela Masih ExpST NWA.

The appellant was called in person for personal hearing on target dated. She was appointed as per statement on 24/11/2988 and was working as PST teacher at GGPS Miranshah. The appellant found absent from her actual duty during frequent visit of AAEO concerned circle, consequently AEO/DEO Proceeded against the appellant by serving upon her show Cause Notice through daily Newspaper vide date 20/2/2018; thereby not responding after the notice served upon her impose major penalty of 'Compulsory Retirement from service' on 21/3/2018.

The appellant during course of hearing contended that she was suffering from skin decease since 2017. Therefore, she was absent from duty on inquiry from the appellant that whether she submit any leave application to the DEO concerned? The appellant remained "MUM" and on the contrary request the committee to convert her compulsory retirement order into Medical retirement, from statement of the appellant presumption can be drawn to the fact, that appellant is still not interested in her services, and remained negligent from her services.

Recommendation.

1. The compulsory Retirement order dated 21/3/2018 may be ordered as intact.
2. DEO may be directed to provide her benefits of retirement expeditiously as permissible under the rules.

Allied
Asstt. District Education Officer
North Waziristan Tribel Distt.

D-2

2. **Mst: Saira Bibi Ex-PST.**

The appellant earlier filed Service Appeal No. 235/2015 in KPK Service Tribunal which was disposed of by the honourable tribunal vide order dated 09/01/2018 for decision and accordingly directions issued by the Service Tribunal was complied with by the Department as case/domicile certificate of appellant was sent for verification to the Political Agent/DC Khyber. It has come to known that the salary of the appellant concerned has been released by DEO Khyber. The appellant now seeks payment of arrears in lieu of salaries un-paid for the period from 2015 to 2018.

Recommendation.

- i. The District Education Officers Khyber may be directed to probe in to the matter and accordingly pay the remaining salaries of the appellant subject to performance of duty.
- ii. In case she had not performed the duty for the prescribed period that may be converted into leave without pay.
- iii. The verification of domicile may be carried out properly.

3. **Mst; Robina Kulsoom PST.**

The appellant as per her contentions was appointed as PST on 3.5.2007 in Tehsil Bara, was transferred to GGPS Malak Wali Khan Jamrud in 2014 and her salary is stopped w.e.f. 28th March, 2017.

Perusal of available record shows that appellant was absent from actual duty as she contends that she was absent due to **maternity Leave**, on the converse, she did not produce any applications as record.

Recommendation:

The case being incomplete due to lack of complete record on the file, therefore, DEO concerned may be directed to furnish the requisite record and report accordingly present status of the appellant.

Mr. Muhammad Ashraf Ex-TT.

The appellant was TT in Orakzai Agency in Ibrahim area, which was closed since 2007-08 to 2016 also the school in which the appellant was appointed was also closed.

Appellant was removed from service due to absence from duty vide order dated 17/2/2017. The appellant, during the course of hearing, contended that whole area was closed and during that period he performed duty in Hangu district which fact were in knowledge of Agency Education Officer, Orakzai.

Recommendation.

The removal order has been passed in hazed, without keeping in view the ground realities i.e. law & order situation, which in fact was deteriorated at that time and appellant,

W. Hussain
Asstt. District Education Officer
North Waziristan Tribal Dist.

12/1/18

E-1 (E)

17-1-2018

143	DE (FAIA) Pesh.	Demand of Leave Salary Invis	
144-50	All concerned	Transfer order in v/o Mahmud CJ Teacher	
151-53	Agency Surgeon (NWA)	Appointment of Female Teacher Safya HOG	
154-60	All concerned	Show Cause Notice	
161	PA (NWA)	Application in v/o Nafise Begum	
162-64	All concerned	Show Cause Notice	
167-72	All concerned	Show Cause Notice	
172	Asstt Director NPS Bannu	No objection certificate	
173-75	Head quarter 7 Division computers	Absent teaching staff of School in NWA	
176-80	HAO (NWA)	Pension case in Jummah area ch. GPs AKhtar Kot	
181-85	All concerned	Retirement Sanction in v/o Gul Bahadur 870 Sail Mohd	
		ED TT GPs MIV Beheder Kant DPK	
186	HAO MRN	Pension case in v/o Gul Bahadur Kant	
		DPK	
		Regularization of ASMA PST GPs Awanj Zaki	
187-90	All concerned	Pull Down of Extra Room	
17-01-18	191-94	P.A N.W.A Bother	Instruction
"	95-100	All concerned	Recharge of Pay in v/o Tajmura A.A.F.O.C.F
"	101	A.A.V	Authority of Bank Account
"	100	Principled GAAP Muzsh.	

Asstt. District Education Officer
North Waziristan Tribal District

REGISTER OF LETTERS DESPATCHED

Date	Issue No.	NAME & DESIGNATION	Place	SUBJECT	File head and No.	Stamps received		Stamps used		Remarks
						Rs.	Ps.	Rs.	Ps.	
18/1/18										
"	123-6	All Concerned		Transfer of (4) NAB Federal Teachers						Musoni Shaker rollers
"	195-96	DE (FAIA) Peskaw		pension claim in v/o						Yousuf Durrani Hum Qasbi Mohd Kat
"	197-100	AAO (NWA)		Sanction of GPF Advances						
"	201	DE (FAIA)		Retirement Grant of BF						in v/o Gul Saad Khan Ex-principal
"	202	Managing Director ESP		"						"
"	203-6	AAO (NWA)		Sanction of GPF Advances						
"	207	A.D. Pass Port Basmal		Grant of international passport						in v/o A.B. Rehman AT
"	208	A.D. Pass Port Basmal		Grant of international passport						in v/o Shey Ali Khan
"	209	DE (FAIA) Peskaw		Grant of GPF sanction						in v/o Muziel Rehman sst Guss Eidak
"	210-13	All Concerned		M/L in v/o						Shamim Heksimi Ps I GAMS, Azad P. S. (45 day)
"	214-17	no		no						Grant of leave (45 day)
"	218-19	Deputy Director (Coord) NAB		Provision of information / documents						
20/1/18	220-22	PA NWA - H/Q 7-Div. DE (FAIA)		Report regarding absent teaching staff						
"	23-25	All Concerned		Office order regarding						leave distribution
"	223-26	All Concerned		Cancellation of leave						in v/o Bushra Gul et

22-1-18	227-28	DE (FATA) Peshawar	Community Appraisal	office order in/fo Mahmood Sharif Khan AAO's
"	229	All Continued		Sanction letter without pay Mahmood Sharif Khan of
"	230-33	All Continued		Maternity leave in/fo Shamim Nadeem PT
"	234-40	All Continued		Absent teaching staff of school in (NWA)
"	241-42	PA (NWA)		Preparation of PC-1 ADP-166 & 167
"	244-47	P.A (NWA)		Work Shop Instructions
"	248-55	AAEOs		Absent report of G. MS Khan Mir Jal
"	256-60	All Continued		Shuhada Package in/fo Asif Gulal & C.T. MS
"	261	D-E (FATA) Peshawar		NOC for International Passport in/fo Ragib Ullah
23-1-18	262	A.D Passport		Instruction to all AAEOs.
"	263-66	AAEOs		Sanction of EPF Advance in/fo Samiul Din TI
23-1-018	267-70	AAO (NWA)		Application for Transfer in respect of Mukhtyar Ahmad
"	271	DE FATA		Sanction of EPF Advance in/fo Muhammad Khan ET
"	272-74	Hm GHS Alikhel		Sanction of EPF Advance
"	275-77	-do-		
"	278-80	Hm GHS Dargal Khel / DE (FATA)		Sanction of EPF Advance in/fo Sakhi Maw Khan SST
"	280-83	Hm GHS Heider Khel		Sanction of EPF Advance
"	284-86	Hm GHS Heider Khel		Sanction of EPF Advance
"	287	PA N.W.A		Nomination of class-IV in/fo Noor Rehman
"	288	DC Health & Services		Medical Board in/fo Asmat Rami
"	289	D-E (FATA)	Transfer Proposal / Ad Justice	
"	290-95	AAO (NWA)		Retirement order Mir Jawad Chaudhary GHS Gul Shah Jank

Assit. District Education Officer
North Waziristan Tribel Distt.

E-3

REGISTER OF LETTERS DESPATCHED

Date	Issue No.	NAME & DESIGNATION	Place	SUBJECT	File head and No.	Stamps received		Stamps used		Remarks
						Rs.	Ps.	Rs.	Ps.	
				11-7-2018						
	97	com Wallerab Etan AIOU		verification of CI certificate						
	98	AO (NWA)		Assume check post facilitation						
	99-100	DE (FAIA) prestawor		Sanction of S.N.E GPs SHW Mahmud Kat Arman						
	101-4	All concerned		Maternity In r/o Noor Jehan Qas						
	105-8	AAO (NWA)		Sanction of GPF Advance in r/o Humad PTC						
	109-	DE (FAIA) prestawor		Transfer proposal in r/o Gul Nazam Khan / Mahmud Adnan Khan						
	110-16	All concerned		Transfer order in r/o Mir Rasool Khan PSI						
	117-26	All concerned		Mutual Transfer						
	127	AAO (NWA)		Pension Documents in r/o Sapiullah DM						
	128	AAO (NWA)		conversion of Retiring into Family Pension Gul Badar						
12-1-2018	129	PA (NWA)		Cump sum grant of B/Fund						
"	130	Asstt Director Regional		grant of gubernatorial passport						
"	131-33	All concerned		Tents Demand						
	134	PA (NWA)		List of class IV of Eidah view						
"	135	PA NWA		B-Fund in r/o Tuluda Akhtar En-PET						
	136-40	AAO (HWA)		Sanction of GPF Advance in r/o Baloch Khan PTC						
"	141-49	AAO (NWA)		Form 10 in r/o Shadila Naz PTC						
5-3-18	1379	DE (FAIA)								

ASST. DIR. REGIONAL OFFICE
 PUNJAB
 LUDHIANA



OFFICE OF THE AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY.

No. 4954 AEO /NWA,
Dated 13 / 7 /2018.

To: The Director Education,
FATA KPK Peshawar.

Subject: APPLICATION FOR RELEASE OF PAY.

Memo;

Reference your letter No. 9714 dated: 11/7/2018, it is submitted for your kind information that Mst; Shakeela Masih PST was working at GGPS Gulmat Kot Khushali Tehsil Mirali. During various surprise visits of AAEO circle concerned as well as on the complaint of Land Donor she has been found absent since long from Government Duty. This office has been issued Explanation with the direction to assume her duty but she failed every time at last her pay was stopped, she produce various prescription from Medical Officer. At last this office has issued Show Cause Notice to the teacher concerned vide this office No: 601-06 dated; 07/01/2018, with the direction to submit reply regarding willful absence from Govt: Duty but she failed. This office has published in daily Newspaper on 20/02/2018 absence Notice with the direction to assume duty but she failed in the prescribed period of time which was intimated in daily Newspaper. After completion of all the codel formalities the teacher concerned was compulsory retired from Govt; Service vide this office No: 2077-83 dated: 20/03/2018. Now she has submitted an application that her health is ok and she is in a position to perform duty regularly.

So you are requested to consider her application on a humanitarian basis please.

[Signature]
Asstt. District Education Officer
North Waziristan Tribale Distt.

[Signature]
Agency Education Officer,
North Waziristan Agency
@
12-7-18

