

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT, ABBOTTABAD

Service Appeal No. 60/2019

Date of Institution ... 14.01.2019
Date of Decision ... 16.03.2021

Obaid ur Rehman, Theology Teacher, presently, residing at House No. T/C 1092, Lower Mohallah Shaib Zai, Village and Post Office, Nawanshehr, Tehsil & District Abbottabad.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Education (School and Literacy) Khyber Pakhtunkhwa Peshawar and two others.

... (Respondents)

Muhammad Shafiq Awan,
Advocate

... For appellant.

Riaz Khan Paindakheil,
Assistant Advocate General

... For respondents.

ROZINA REHMAN
ATIQU UR REHMAN WAZIR

... MEMBER (J)
... MEMBER (E)

JUDGMENT

ROZINA REHMAN, MEMBER : Obaid ur Rehman was a Theology Teacher. He was dismissed from service vide order dated 02.07.2018. It is the legality and validity of this order which has been challenged

16/3/21

by him in the present service appeal filed U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

2. Brief facts of the case are that appellant applied for leave without pay for two years which was accordingly sanctioned, whereafter, he applied for its extension. After expiry of leave he submitted an application for his adjustment but to no avail and instead of issuing adjustment order, an inquiry was ordered to be initiated. He was charge sheeted which was properly replied and vide order dated 02.07.2018 he was dismissed from service, he, therefore, submitted departmental appeal which was not responded to, hence, the present service appeal.

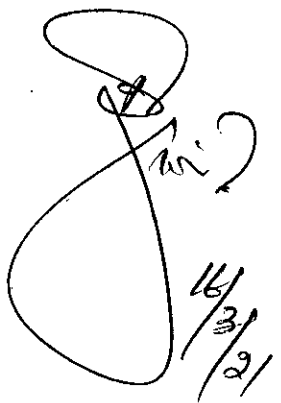
3. Learned counsel for appellant argued that the impugned order dated 02.07.2018 is against law and facts as inquiry was not conducted according to law and that the entire proceedings were carried out in the absence of appellant. He argued that despite repeated requests, no adjustment order was issued. He contended that the appellant was not afforded any opportunity of personal hearing and he was condemned unheard and lastly, he submitted that appellant has put in considerable pensionable service of almost 18 years and that he would have no objection if major penalty in shape of dismissal from service is converted into major penalty in shape of compulsory retirement.

4. Conversely, learned A.A.G argued that the appellant remained willful absent from duty from 01.05.2011 to 20.03.2018. He further

8
16/3/21

submitted that inquiry committee was constituted in order to conduct proper inquiry against appellant in accordance with law and that proper charge sheet as well as statement of allegations were served upon appellant.

5. From the record it is evident that proper application was submitted by the appellant for long leave which application was properly forwarded and which application was accepted by the respondents to the extent of sanction of EOL without pay w.e.f 01.05.2009 to 30.04.2011, where-after, he submitted another application for extension of leave from 1st May, 2011 to 30th April, 2013. It is admitted that this application was properly forwarded by the Principal of the concerned school to the E.D.O (E&SE) Abbottabad but no sanction was granted and the appellant availed the said leave without any sanction. He then submitted his arrival report on 02.05.2013 and a request was made for adjustment but to no avail. It is astonishing that right from the date of submission of application i.e. 23.08.2011 till 28.03.2018 no action was taken against the appellant. Nothing was brought on record in order to show that appellant was habitual absentee. Keeping in view the last request of the learned counsel for appellant and without touching other merits of the case, we are of the view that since the appellant has put in considerable regular service, it would be appropriate, keeping in view the circumstances of the case to convert major penalty awarded in the shape of dismissal from service into that of compulsory retirement



Handwritten signature and date: 16/3/21

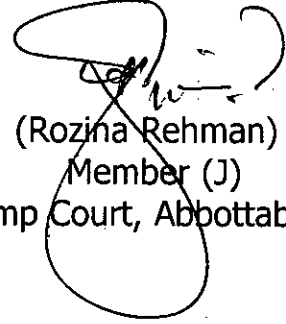
from service. As such, we convert the said penalty into that of compulsory retirement. Order accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

16.03.2021


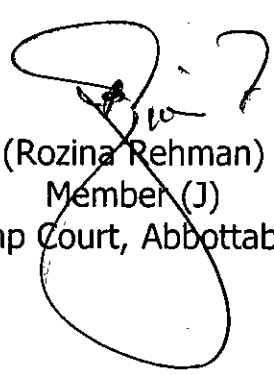


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Abbottabad



(Rozina Rehman)
Member (J)
Camp Court, Abbottabad

Service Appeal No. 60/2019

S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	16.03.2021	<p><u>Present.</u></p> <p>Muhammad Shafiq Awan, ... For appellant Advocate</p> <p>Riaz Khan Paindakheil, ... For respondents Assistant Advocate General</p> <p>Vide detailed judgment of today placed on file, the penalty of dismissal from service is converted into compulsory retirement from service. Order accordingly. Parties are left to bear their own costs. File be cosigned to the record room.</p> <p><u>ANNOUNCED.</u> 16.03.2021</p> <p> (Atiq ur Rehman Wazir) Member (E) Camp Court, Abbottabad</p> <p> (Rozina Rehman) Member (J) Camp Court, Abbottabad</p>

18.01.2021

Due to COVID-19, the case is adjourned for the same on 16.02.2021 before D.B.

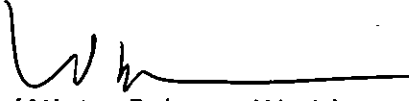

READER


16.02.2021

Appellant present through counsel.

Noor Zaman Khattak alongwith Sohail Ahmad Zeb
Litigation Officer for respondents present.

Latter made a request for adjournment; allowed but
with last chance. To come up for record/arguments on
16.03.2021 before D.B at Camp Court, Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Abbottabad

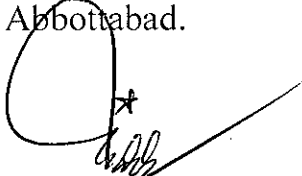

(Rozina Rehman)
Member (J)
Camp Court, Abbottabad

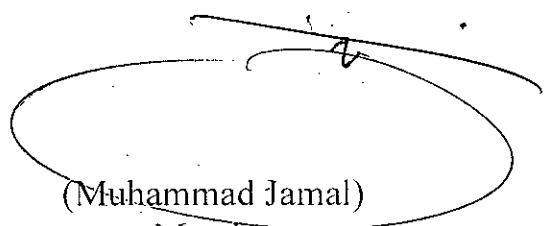
14.09.2020

Appellant has not forth come despite having been called time and again and he was waited for till 3:30 PM. Mr. Usman Ghani, District Attorney alongwith Mr. Sohail Ahmad Zeb, Assistant Litigation for respondents present.

Perusal of preceding order sheet revealed that the case was adjourned due to summer vacation, therefore, in the circumstances it is deemed appropriate to issue notice to the appellant as well as his respective counsel.

Adjourned to 16.11.2020 for arguments before D.B at camp court Abbottabad.

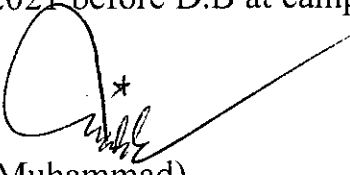

(Mian Muhammad)
Member(E)

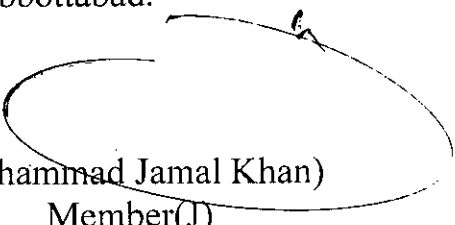

(Muhammad Jamal)
Member
Camp Court A/Abad

16.11.2020

Appellant alongwith his counsel is present. Mr. Usman Ghani, District Attorney alongwith Mr. Sohail Ahmad Zeb, Assistant (Litigation) for respondents are present.


Learned counsel for the appellant submitted to be furnished entire record of enquiry proceedings including the statements of witness, if any, enabling him to prepare for arguments. The learned District Attorney is directed to hand him over the copy of enquiry proceedings. The learned District Attorney submitted to direct appellant to produce his passport. He was directed to adopt proper procedure set for the purpose. File to come up for further proceedings/arguments on 18.01.2021 before D.B at camp court Abbottabad.

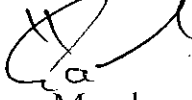

(Mian Muhammad)
Member(E)


(Muhammad Jamal Khan)
Member(J)
Camp Court Abbottabad

23.01.2020

Appellant in person present. Mr. Muhammad Jan, DDA alongwith Mr. Sohail Ahmad Zeb, Assistant for the respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings on 17.02.2020 before D.B at camp court Abbottabad.



Member


Member
Camp Court A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on 11/9
9 / 20 at camp court abbottabad.


Reader

22.08.2019

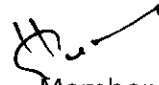
Learned counsel for the appellant present. Written reply not submitted. Sohail Ahmad Zeb Litigation Officer present and requested for time to furnish written reply/comments. Granted. To come up for written reply/comments on 23.10.2019 before S.B at Camp Court Abbottabad.



Member
Camp Court A/Abad

23.10.2019

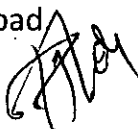
Appellant in person present. Mr. Usman Ghani, District Attorney present. Mr. Sohail Ahmad Zaib, Assistant for the respondents present. Representative of respondents has furnished joint parawise comments on behalf of the respondents, placed on record. The appeal is assigned to D.B for rejoinder, if any and arguments on 17.12.2019 at camp Court, Abbottabad.



Member
Camp court, A/Abad

✓ 17.12.2019

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Sohail Ahmad Zeb, Litigation Officer for the respondents present. Learned counsel for the appellant requested for requisitioning of statements of witnesses recorded during the inquiry proceeding by the inquiry officer. Representative of the department is directed to furnish the aforesaid record alongwith complete record of inquiry proceeding on the next date positively. Case to come up for record and arguments on 23.01.2020 before D.B at Camp Court Abbottabad



(Hussain Shah)
Member
Camp Court Abbottabad



(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

21.06.2019

Counsel for the appellant present.

Contends that the appellant was allowed two years leave w.e.f. 01.05.2011 upto 30.04.2013. Subsequently, he applied for extension of leave for another period of two years which request was duly forwarded to the District Education Officer (Male) Elementary & Secondary Education Abbottabad. On 18.05.2013 the appellant reported for duty to the Principal GHS Kakul Abbottabad and his request for the purpose was forwarded to the DEO(M) Abbottabad. There-after the appellant has been submitting reminders/applications time and again for the purpose but to no avail. Ultimately on 02.07.2018 an order of dismissal from service was passed against the appellant on account of absence from duty from 01.05.2011 to 20.03.2018. It was added that no proper enquiry was conducted against the appellant before passing of the impugned order nor he was extended the opportunity of his defence. His departmental appeal also remained un-responded. During the departmental proceedings the provisions contained in Rule 9 of the Government of Khyber Pakhtunkhwa Government Servants (E&D) Rules 2011 was not complied with.

In view of the record and arguments of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 22.08.2019 before S.B at camp court, Abbottabad.

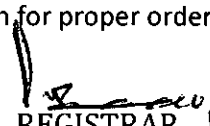
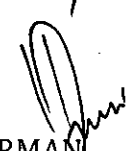


Appellant Deposited
Security & Process Fee

28/6/19


Chairman
Camp Court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 60/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/1/2019	<p>The appeal of Mr. Obaid-ur-Rehman presented today by Mr. Muhammad Shafiq Awan 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 14/1/19</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>
22.03.2019		<p>Appellant in person present and submitted application for adjournment. Adjourn. To come up for preliminary hearing on 21.05.2019 before S.B at Camp Court A/Abad.</p> <p style="text-align: right;"> Member Camp Court A/Abad</p>
21.05.2019		<p>Junior counsel for the appellant present and requested for adjournment on the ground that learned senior counsel is busy before the Hon'ble Peshawar High Court Abbottabad Bench. Adjourned to 21.06.2019 for preliminary hearing before S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court Abbottabad</p>

BEFORE THE KHYBER PAKHTUNKHWA PROVINCE
SERVICE TRIBUNAL, PESHAWAR

Appeal No. 60 /2018

Obaid ur Rehman, Theology Teacher, presently, residing at House No. T/C 1092 Lower Mohallah Shoaib Zai, Village and Post Office, Nawanshehr, Tehsil and District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Education, (Schools and Literacy) Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page Nos.	Annexures
1.	Memo of appeal alongwith affidavit	1 to 09	
2.	Addresses of the parties	10	
3.	Copy of the application	11	"A"
4.	Copy of application dated 18/05/2013	12 to 13	"B"
5.	Copy of the application	14 to 15	"C"
6.	Copy of the letter No. 3774/EB/I/F. No. 5 Leave AT/TT/Q/DM dated 29/03/2018 alongwith charge sheet and statement of allegations	16 to 18	"D"
7.	Copy of the reply of charge sheet	19 to 20	"E"
8.	Copies of show cause notice and reply	21 to 23	"F" & "G"
9.	Copy of impugned order No. 7466-70 dated 02/07/2018.	24	"H"
10.	Copy of the application	25 to 26	"I"
11.	Copy of appeal and copy of receipt No. 1394	27 to 32	"J" & "K"
12.	Wakalatnama	33	

...APPELLANT

Through:-

Dated: 11/01/2018

(MUHAMMAD SHAFIQ AWAN)
Advocate High Court, Abbottabad

1

BEFORE THE KHYBER PAKHTUNKHWA PROVINCE
SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 55

Dated 14-01-2019

Appeal No. 60 /2018

Obaid ur Rehman, Theology Teacher, presently, residing at House No. T/C 1092, Lower Mohallah Shoaib Zai, Village and Post Office, Nawanshehr, Tehsil and District Abbottabad.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, (Schools and Literacy) Khyber Pakhtunkhwa, Peshawar.
2. Director Education, (Schools and Literacy) Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Tehsil and District Abbottabad.

...RESPONDENTS

Filed to-day

Registrar

14/1/19

APPEAL SOLICITING SETTING ASIDE DISMISSAL ORDER PASSED BY RESPONDENT NO. 3 VIDE NOTIFICATION NO. 7466-70 DATED 02/07/2018 VIDE WHICH THE APPELLANT IS DISMISSED FROM SERVICE, AND, PRAYING THAT ON ACCEPTANCE OF THE INSTANT APPEAL, THE SERVICES OF THE APPELLANT MAY KINDLY BE

RESTORED WITH ALL BACK BENEFITS AND ANY
OTHER RELIEF WHICH THIS HONOURABLE
TRIBUNAL DEEMS FIT MAY KINDLY BE
GRANTED TO THE APPELLANT.

=====

Respectfully Sheweth;-

1. That the appellant was serving as Theology Teacher from the year 1993 and was posted as such in Govt. High School Kakul.
2. That the appellant obtained leave without pay from 01/05/2009 and the same was extended after the expiry of the initial period upto 18/05/2013. Copy of the application is attached as Annexure "A"
3. That after the expiry of leave, the appellant submitted an application dated 18/05/2013 for his adjustment to the then Principal Govt. Higher Secondary School, Kakul, Abbottabad and the said application was forwarded to respondent No. 3 vide diary No. 787 dated 18/05/2013. Copy of the application is attached as Annexure "B".
4. That the appellant time and again visited the principal as well as the office of the respondent No. 3 for his adjustment, however, the appellant

was informed time and again by the officials of the office of the respondent No 3 that his case is in progress for adjustment and whenever the order of adjustment is made, the appellant will be informed accordingly.

5. That lastly, the appellant again moved an application to the respondent No. 3 through Principal Govt. Higher Secondary School Kakul for his adjustment. The said application was again sent to respondent No. 3 vide diary No. 11161 dated 24/11/2017. Copy of the application is attached as Annexure "C".
6. That on receipt of application dated 23/11/2017, (Annexure "B") the respondent No. 3 instead of issuing adjustment order, ordered inquiry of the appellant through inquiry officer by realizing the faults of his own officials and to save their own skin.
7. That the respondent No. 3 issued charge sheet as well as summary of allegations vide letter No. 3774/EB/I/F. No. 5. Leave AT/TT/Q/DM dated 29/03/2018. Copy of the aforesaid letter alongwith

charge sheet and statement of allegations are attached as Annexure "D".

8. That the appellant submitted his reply to the charge sheet to the inquiry officer. Copy of the reply of charge sheet is attached as Annexure "E".
9. That the respondent No. 3 on receipt of so-called illegal inquiry proceedings issued show cause notice No. 5705 dated 11/05/2018 to the appellant and the appellant filed his reply to the show cause notice on 25/05/2018 in the office of respondent No. 3. Copies of show cause notice and reply are attached as Annexure "F" & "G".
10. That respondent No. 3 instead of realizing the illegalities and inactions on the part of their own and the illegal proceedings of inquiry officer issued dismissal order of the appellant vide Endst. No. 7466-70 dated 02/07/2018. Copy of the impugned order is attached as Annexure "H".
11. That the respondent No. 3 with malafide intention did not send the impugned notification to the appellant, so, the appellant moved an application and in view of the application of the appellant, the

respondent No. 3 issued copy of the impugned notification to the appellant on 10/09/2018. Copy of the application is attached as Annexure "I"

12. That on receipt of the copy of the impugned notification the appellant submitted his appeal against the impugned notification to respondent No. 2 on 15/09/2018. Copy of appeal and copy of receipt No. 1394 are attached as Annexures "J" & "K".

13. That the respondent No. 2 has ~~kept~~^{not} not decided the appeal of the appellant, so, the appellant being aggrieved of the impugned notification dated 02/07/2018, now, moves this Honourable Tribunal and praying that on acceptance of the instant appeal, the services of the appellant may kindly be restored with all back benefits and any other relief which this Honourable Tribunal deems fit may kindly be granted to the appellant and it is also prayed that if any adverse order is passed by the respondent No. 2 in the meantime, the said order may kindly be also set-aside, inter-alia, on the following grounds:-

GROUND:-

- a. That impugned order dated 02/07/2018 against the law and fact, hence liable to be a set-aside.
- b. That no inquiry proceedings are carried out by the inquiry officer in accordance with the law and justice and rules but all the proceedings are done in the absence of the appellant and the impugned order is passed by respondent No. 3 to cover his own malafide actions as well as the faults of his own office officials in utter disregard of the law on the subject, thus, the impugned order is un-sustainable at law and facts and is liable to be set-aside.
- c. That respondent No. 3 by not issuing any adjustment order in view of the application dated 18/05/2013 of the appellant, committed serious illegalities and proved the height of inefficiency and lack of interest in the official duties by the respondent No. 3 as well as his subordinate staff which require actions against them under the relevant

provisions of the law on the subject and the impugned order is liable to be set-aside in view of these illegalities and inefficiency on the part of respondent No. 3.

- d. That the respondent No. 3 before passing the impugned order did not afforded an opportunity of personal hearing to the appellant and even did not consider the record produced and annexed by the appellant with his replies, thus, the impugned order being violative of law as well as the natural justice is liable to be set-aside and the appellant is entitled to be restored as Theology Teacher with all the back benefits.
- e. That during the entire period of service no complaint of any kind of involvement of the appellant is ever made against the appellant and the appellant being sole supporter of his family as well as parents is liable to be restored as Theology Teacher by setting aside the impugned notification with all the back benefits.

- f. That the entire proceedings conducted by respondent No. 3 as well as the inquiry officer are against the guaranteed constitutional rights of the appellant, so, the impugned notification is liable to be set-aside on this score too.

It is, therefore, humbly prayed that, on acceptance of the instant appeal, the impugned order dated 02/07/2018 of respondent No. 3 may kindly be set-aside and the services of the appellant may kindly be restored with all back benefits and any other relief which this Honourable Tribunal deems fit may kindly be granted to the appellant and it is also prayed that if any adverse order is passed by the respondent No. 2 in the meantime, the said order may kindly be also set-aside in the best interest of justice and law .


...APPELLANT

Through:

Dated: 11/01/2019


(MUHAMMAD SHAFIQ AWAN)
Advocate High Court, Abbottabad

VERIFICATION:-

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


...APPELLANT

BEFORE THE KHYBER PAKHTUNKHWA PROVINCE
SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____/2018

Obaid ur Rehman, Theology Teacher, presently, residing at House No. T/C 109, Lower Mohallah Shoaib Zai, Village and Post Office, Nawanshehr, Tehsil and District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Education, (Schools and Literacy) Khyber Pakhtunkhwa, Peshawar & others.

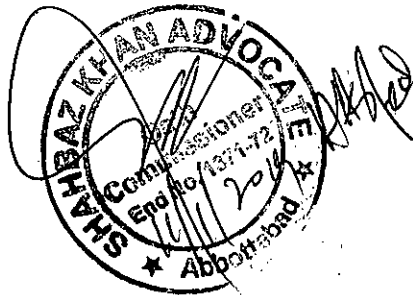
...RESPONDENTS


SERVICE APPEAL

AFFIDAVIT OF

Obaid ur Rehman, Theology Teacher, presently, residing at House No. T/C 109, Lower Mohallah Shoaib Zai, Village and Post Office, Nawanshehr, Tehsil and District Abbottabad

I, the deponent named above, do hereby declare on oath that the contents of foregoing appeal are true and correct to the best of my knowledge, information and belief and nothing has been suppressed from this Honourable Tribunal.




 DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA PROVINCE
SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____ /2018

Obaid ur Rehman, Theology Teacher, presently, residing at House No. T/C 109~~2~~, Lower Mohallah Shoaib Zai, Village and Post Office, Nawanshehr, Tehsil and District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Education, (Schools and Literacy) Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

ADDRESSES OF THE PARTIES

Obaid ur Rehman, Theology Teacher, presently, residing at House No. T/C 109, Lower Mohallah Shoaib Zai, Village and Post Office, Nawanshehr, Tehsil and District Abbottabad.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, (Schools and Literacy) Khyber Pakhtunkhwa, Peshawar.
2. Director Education, (Schools and Literacy) Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Tehsil and District Abbottabad.

...RESPONDENTS

...APPELLANT

Dated: 11/01/2018

Through



(MUHAMMAD SHAFIQ AWAN)
 Advocate High Court, Abbottabad

کامیاب اور ترقی دہندہ اور سرگرم اور خوشامیاب اور صبر اور ...

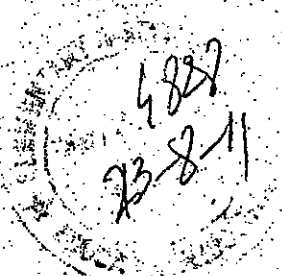
11

عہدوں :- درخواست رائے رائے لیسو

Annex "A"

گزارش کے لئے سائلے خوردہ دہم سے 2009ء سے 30 اپریل 2011ء تک دو سال کے لئے گورنمنٹ سکول کاکول سے ...
... 2011ء تک 30 اپریل 2013ء تک چھ عہدے رد کیا جائے ...

Handwritten signature



اسرائیل
عبدالرحمان

علم اسلامیات گورنمنٹ سکول کاکول

تاریخ 23.8.2011

Application forwarded on 15/10/2011

No. 485 dated kaku the 06/09/2011 forwarded to the E.D.O (E+SE) A Asad in original application along with 8/Board for EOL without pay w/e 1-5-20 to 30-4-2013 (two years) for favor; n/a please

Attested
M. B. ...

PRINCIPAL 6/9/2011
Govt. Secondary School
KAKUL, Abbottabad

خدمت حساب پر لٹل ماہی گریڈنگ سیکٹری سکول کاکول ایدھا آباد

جناب عالی! - B Amex

گزارش ہو کر سائل یکمٹی 2009 سے 30 اپریل 2011 تک

لانڈ لیو پر تھا جو کہ ایڈریٹنگ ڈسٹرکٹ سیکرٹری کاکول ایدھا آباد

6599-6600 تاریخ 02-06-2010 عرصہ 2 سال منظور ہوئی تھی۔

ایک لکھ میں جس کام کیلئے لٹی کی تھی وہ کام مکمل نہ ہو سکا ہے میں بااثر

محوری دورہ یکمٹی 2011 تا 30 اپریل 2013 تک چٹی لفٹر تنخواہ کیلئے درخواست

دی گئی اب جبکہ چٹی کا سیریل ٹائم ہو چکا ہے میں اب درخواست یکمٹی

2013 کو اپنی ڈیوٹی بحال رہا ہوں۔ لہذا عرض ہو کہ سیری حافی رپورٹ

منتظر رہنا کہ شکر فرمائیں اور لٹی کی سکول میں تعیناتی کا حکم صادر

فرمائیں =

العارض

عبدالرحمان (معلم اسپیشل) سابقہ گریڈنگ سیکٹری سکول کاکول

No 787 Dated 19-05-2013 02-05-2013

[Handwritten Signature]

Forwarded in original to The DEO (male) Abbottabad

Attested
Mansoor

13

along with service Book for further information please.
with the removals that the 9 TT is already filled. (in in) 12/5/2013

PRINCIPAL
Govt. Secondary School,
KAMUL, Abbottabad,

Attested
MB

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب ضلع اینٹ آباد بوساطت پرنسپل گورنمنٹ سیکنڈری سکول کاکول

مضمون: درخواست برائے تعیناتی / ایڈجسٹمنٹ

جناب عالی! گزارش ہے کہ سالانہ یکم مئی 2009 سے 30 اپریل 2011 تک اور پھر یکم مئی 2011 سے 30 اپریل 2013 تک گورنمنٹ سیکنڈری سکول کاکول سے لائنگ لیولی تھی اور چھٹی ختم ہونے پر یکم مئی 2013 کو Arrival report کی تھی لیکن متعدد بار ڈسٹرکٹ آفس کے چکر لگانے کے باوجود تا حال نہ تو مجھے اپنے سکول میں اور نہ ہی کسی اور سٹیشن پر تعینات کیا گیا اور نہ ہی اس عرصہ میں مجھے تنخواہ دی گئی۔

لہذا استدعا ہے کہ سائل کو جلد از جلد معلم اسلامیات کی پوسٹ پر تعیناتی کا حکم صادر فرمایا جائے اور اس عرصہ کی تنخواہ بھی دی جائے تاکہ سائل معاشی مسائل سے چھٹکارا حاصل کر سکے۔

العارض

عبید الرحمن (معلم اسلامیات)

تاریخ: 23 نومبر 2017

Attested
Mansoor

15

Date:

Dairy NO 11161
dated 24-11-2017
D.E.O (M)
Office Abbottabad

Attested
Mansoor

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

(A)
16

No. 3774 / EB-I/F.No.5 leave AT/TF/Q/DM Dated 29 / 3 / 2018

2/0


Amra - D

To

The Principal,
GHS Kakul,
Abbottabad.

Subject:- CHARGE SHEET AND STATEMENT OF ALLEGATIONS
Memo:

Enclose please find herewith charge sheet and statement of allegations in
r/o Mr.Ubaid Ur Rehman TT of your school with the direction to serve upon him and
return one copy to this Office as a token of receipt.


DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Attested
Maid

No. 3774 /EBII/F.No.5/L/Cases AT/TT/Q/DM

Dated 29/3 2018

(A)

(17)

25

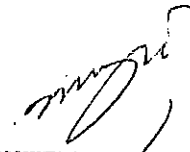
CHARGE SHEET

1. I Qazi Tajammal Hussain, District Education Officer (Male) Abbottabad as Competent Authority, hereby charge you, Mr. Ubaid-ur-Rehman, Theology Teacher, as follows:

That you, while posted as Theology Teacher at GHS Kakul, Abbottabad committed the following irregularities:

“You were granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to uptil now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018”.

2. By reason of the above, you appear to be guilty of willful absent from duty under Rule-3 of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified Rules of the Rules ibid
3. You are, therefore, required to submit your written defence within ten days of the issuance of this Charge Sheet to the Enquiry Officer, as the case may be.
4. Your written defence, if any, should reach the Inquiry Officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be head in person.
6. A statement of allegations is enclosed.


COMPETENT AUTHORITY

Mr. Ubaid-ur-Rehman, Theology Teacher, GHS Kakul, Abbottabad.

Attested


(A)

DISCIPLINARY ACTION

18

24

1. I Qazi Tajammal Hussain , District Education Officer (Male) Abbottabad as competent authority, am of the opinion that Mr.Ubaid Ur Rehman TT GHS Kakul, Abbottabad has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

"You were granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to uptil now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018".

2. For the purpose of inquiry of the said accused with reference to the above allegations .Inquiry committee comprising the following officers is hereby constituted under Rule 10 (1) (a) of the ibid rules :

1. Syed Amjad Ali, Principal, GHS Sheikhal Bandi Abbottabad.
2. Mr.Abdul Salam Principal, GHS No.4 Abbottabad.

3. The inquiry committee shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused, record it findings and make, within fifteen days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.
4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer.

COMPETENT AUTHORITY

Mr.Ubaid Ur Rehman TT GHS Kakul Abbottabad

Attested
Maidy

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر ضلع ایبٹ آباد

عنوان :- جواب چارج شیٹ نمبری 3774 مورخہ 29-03-2018

جناب عالی! *Amro* -
جواب چارج شیٹ ذیل عرض ہے۔

۱۔ فقرہ نمبر اچھٹی 01-05-2009 تا 30-04-2011 کی حد تک درست ہے۔ بقایا فقرہ جس طرح تحریر ہے سراسر غلط ہے لہذا انکار ہے اصل حقائق یوں ہیں کہ مذکورہ چھٹی کے اختتام پر سائل نے حسب ضابطہ گورنمنٹ ہائی سکول کاکول میں مورخہ 23-08-2011 کو چھٹی میں توسیع متعلقہ اتھارٹی کو بذریعہ ڈائری نمبر 455 مورخہ 06-09-2011 دی جو کہ پرنسپل نے بروقت درخواست کو ارسال کر کے سائل چھٹی منظوری کا زبانی حکم صادر کر دیا کہ سکول نے آپ کی چھٹی پر سنکشن کر دی ہے جو مذکورہ چھٹی کے اختتام پر سائل نے مورخہ 02-05-2013 کو حاضر ہو کر درخواست دی جو کہ پرنسپل نے باقاعدہ تحت 787 مورخہ 18-05-2013 درخواست سائل معہ دیگر ضروری کاغذات ڈسٹرکٹ ایجوکیشن میل کو ارسال کئے۔ اس کے بعد سائل نے متعدد بار سکول و D.E.O آفس برائے تعیناتی چکر لگائے مگر سائل کو زمداران بار بار زبانی طور پر تاریخ دیتے رہے آخر کار سائل نے مورخہ 23-11-2017 کو بذریعہ درخواست اپنی تعیناتی / ایڈجسٹمنٹ پرنسپل صاحب نے اپنے ریماکس کے ساتھ متعلقہ اتھارٹی کو بھیجا کہ سائل کی درخواست مورخہ 18-05-2013 کو تحت ڈائری نمبر 787 برائے مزید کارروائی ارسال کی گئی تھی جو درخواست نمبر 1394 مورخہ 23-11-2017 DEO میل کے آفس بھیجی گئی جو درخواست ہذا DEO آفس میل ایبٹ آباد تحت ڈائری نمبر 11161 مورخہ 24-11-2017 درج کی گئی جس سے عیاں ہے کہ سائل نے کوئی غیر حاضری جان بوجھ کر یا عمدانہ کی بلکہ متعلقہ اہلکاران اپنے غیر قانونی غیر مجازانہ وغیر اخلاقی افعال کو چھپانے کی خاطر سائل کی ہی درخواست مورخہ 23-11-2017 کی وجہ سے جملہ غیر قانونی کارروائی کر کے اپنی لاپرواہی پر پردہ ڈالنے کی خاطر سائل کے خلاف جھوٹ پڑنی الزامات لگا رہے ہیں تاکہ سائل کو اس کے قانونی و آئینی حق سے محروم کیا جاسکے جو متعلقہ اہلکاران کے مذکورہ افعال قابل سزا ہیں مزید یہ کہ سائل کی درخواست جو کہ پرنسپل صاحب مذکورہ مورخہ 18-05-2013 کو بذریعہ ڈائری نمبر 187 پر کارروائی کرنے کے بجائے سائل کو عرصہ دراز بعد نام نہاد چارج شیٹ جاری کی جو کہ E & D رول 2011 صریحاً خلاف ورزی ہے ثبوت ہائے جو کہ مشتمل 4 اوراق ہیں لف ہیں۔

۲۔ فقرہ نمبر ۲ چارج شیٹ جس طرح تحریر ہے سراسر غلط ہے لہذا انکار ہے مفصل جواب فقرہ بالا میں دیا گیا ہے۔

۳۔ فقرہ نمبر ۳ کے جواب میں عرض ہے کہ سائل کو چارج شیٹ مورخہ 16-04-2018 بذریعہ انکوائری آفیسر وصول ہوئی جس کا جواب آج مورخہ 17-04-2018 کو دیا جا رہا ہے جو اندر میعاد ہے۔

Attest
Mansoor

۴۔ فقرہ نمبر ۴ کا جواب فقرہ بالا میں دیا جا چکا ہے۔

۵۔ فقرہ نمبر ۵ چارج شیٹ کے جواب میں عرض ہے کہ سائل اصالتاً پیش ہو کر اپنے حقوق کا دفاع کرنے کا خواہاں ہے

حالات مذکورہ بالا کی روشنی میں تقاضہ انصاف و قانون ہے کہ سائل نا کردہ گناہ ہے اس لئے سائل کو نوکری پر ہمراہ سابقہ مراعات و واجبات بحال کرنے کا حکم صادر فرمایا جاوے۔

المقوم:-

عبد الرحمان معلم اسلامیات

عبد الرحمان معلم اسلامیات

نوٹ:- تمام ضروری کاغذات دستاویزات اور نوٹوں کا پی سرورس بک برائے ملاحظہ ہیں

Attested
M. A. R.

5705 EB-III-PF

Dated _____ 2018

SHOW CAUSE NOTICE. Annex - "F"38
21


I, Qazi Tajammal Hussain, District Education Officer (Male) Abbottabad as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 do hereby serve you, Mr. Obaidur Rehman, Theology Teachers, GHS Kakul Abbottabad Abbottabad:

1. (i) That consequent upon the completion of inquiry conducted against you by the inquiry committee, for which you were given opportunity of hearing and further Inquiry Committee provided you chance of self defence and cross examination.
- ii) On going through the findings and recommendations of the Inquiry Committee, the material on record and other connected papers including your defence before the inquiry committee.

I am satisfied that you have committed the following offences/acts/omissions specified in Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule, 2011.

"You were granted Extra Ordinary Leave without pay w.e.from 01.5.2009 to 30.4.2011 (730 day) vide this Office Endst: No.6599-6600 dated 02.6.2010, whereas after the expiry of leave, you remained willful absent from duty w.e.from 01.5.2011 to uptil now without any information/approval of the Competent Authority".

2. As a result thereof, I, as Competent Authority, have tentatively decided to impose upon you the major penalty of "Dismissal from Service" under Rule-4(1) Sub Rule (b)(iv) of the said rules.
3. You are therefore required to show cause as to why the aforesaid penalties should not be imposed upon you and also intimate whether you desire to be heard in person.
4. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.


COMPETENT AUTHORITY

Mr. Obaidur Rehman, Theology Teachers, GHS Kakul Abbottabad.

House No- T/C 1092, Mohallah Shoeb Zai,
Village & PO. Nawansheri, Abbottabad.

Regd.

Attested
Mansoor

District Education Officer
(Male) Abbottabad

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ایبٹ آباد

عنوان :- جواب شوکا ز نوٹس نمبری 5705 مورخہ 11-05-2018

جناب عالی! - Annex

جواب شوکا ز نوٹس ذیل عرض ہے۔

عذرات :-

- ۱- یہ کہ جملہ انکوآری برخلاف سائل سراسر غلط، غیر قانونی ہونے کی وجہ سے سائل کے حقوق پر باطل و کالعدم ہے جو قابل اخراج ہے اور سائل اپنی مع سابقہ مراعات ڈیوٹی پرائیڈ جسٹمنٹ کا حقدار ہے۔
- ۲- یہ کہ جملہ انکوآری اعلیٰ عدالت ہائے کے فیصلہ جات کی روشنی میں قابل اخراج ہے اور سائل مع سابقہ مراعات و واجبات ڈیوٹی پرائیڈ جسٹمنٹ کا حقدار ہے۔
- ۳- یہ کہ سائل کی تقریباً 22 سال بے داغ نوکری ہے اور سائل ناکردہ گناہ ہے و نیز سائل کے چھوٹے بچے اور بوڑھے والدین ہیں جنکی سائل کے سوا کوئی دیکھ بھال کرنے والا نہ ہے اسلئے سائل مع سابقہ مراعات و واجبات ڈیوٹی پرائیڈ جسٹمنٹ کا حقدار ہے۔
- ۴- یہ کہ سائل اگر جان بوجھ کر غیر حاضر تھا تو سائل کے خلاف سائل کی درخواست محررہ 23/11/2017 سے قبل کاروائی کیوں نہ کی گئی۔ سائل کی درخواست داخل کرنے پر محکمہ نے اپنے غیر قانونی افعال پر پردہ ڈالنے اور اپنے اہلکاران کو بچانے کی خاطر انکوآری کی جو وہ بھی برطبق قانون نہ کی گئی جو کہ سائل کو اس کے قانونی حق سے محروم کرنے کی کوشش ہے جو اس بنیاد پر انکوآری قابل اخراج ہے اور سائل مع مراعات و واجبات ڈیوٹی پرائیڈ جسٹمنٹ کا حقدار ہے۔
- ۵- یہ کہ جملہ کاروائی خلاف سائل متعلقہ قانون E & D رولز 2011 کی صریحاً خلاف ورزی ہے بدیں وجہ سائل سابقہ مراعات و واجبات ایڈ جسٹمنٹ کا حقدار ہے۔

جواب فقرہ جات شوکا ز نوٹس۔

(i) - یہ کہ فقرہ نمبر شوکا ز نوٹس جس طرح تحریر کیا گیا ہے سراسر غلط، خلاف قانون ہے لہذا انکار ہے سائل کی اطلاع کے مطابق اور سائل کی موجودگی میں کوئی گواہ پیش نہیں ہوا اس لیے کہ اس کا سوال بے معنی ہے نیز انکوآری میں بھی کسی گواہ کا ذکر نہیں اور کوئی گواہ سائل کی عدم موجودگی میں پیش ہو تو بھی Cross Examination کا موقع نہ دیا گیا۔ اور نہ ہی سائل کو گواہان کے بیانات کی نقول فراہم کی گئی۔ بدیں وجہ انکوآری برخلاف سائل void Abinitio ہے۔

(ii) - یہ کہ انکوآری کی سفارشات قانون اور حالات کے صریحاً خلاف ہے کیونکہ سائل نے جو چارج شیٹ کا جواب انکوآری کمیٹی کے پاس جمع کروایا تھا اسکو سرے سے نظر انداز کیا گیا اور اس جواب میں تحریر کردہ واقعات کو بھی نظر انداز کیا گیا جو کہ انکوآری سفارشات اس بنا پر ہی قابل اخراج ہیں نیز انکوآری کمیٹی نے یکطرفہ طور پر کاروائی کرتے ہوئے بدیں معنی کے سارا امور و الزام

ADD (1/16)
انکوائری

3/199
9/5/18

Handwritten signatures and initials at the bottom left.

سائل کو ہی ٹھہرایا گیا اور متعلقہ اہلکاران کے غیر قانونی اور غیر مجازانہ افعال کو چھپایا ہے اور ساری لاپرواہی کا ذمہ دار سائل کو ٹھہرایا ہے۔ دراصل چھٹی کے اختتام پر سائل نے مورخہ 02-05-2013 کو حاضر ہو کر درخواست دی جو کہ پرنسپل نے باقاعدہ تحت نمبر 787 مورخہ 18-05-2013 درخواست سائل معہ دیگر ضروری کاغذات ڈسٹرکٹ ایجوکیشن میل کو ارسال کئے۔ اس کے بعد سائل نے متعدد بار سکول و D.E.O آفس برائے تعیناتی چکر لگائے مگر سائل کو ذمہ داران بار بار زبانی طور پر تاریخ دیتے رہے آخر کار سائل نے مورخہ 23-11-2017 کو بذریعہ درخواست اپنی تعیناتی / ایڈجسٹمنٹ پرنسپل صاحب دی جس پر پرنسپل صاحب نے اپنے ریمارکس کے ساتھ درخواست سائل متعلقہ اتھارٹی کو بھیجی کہ سائل کی درخواست مورخہ 18-05-2013 کو تحت ڈائری نمبر 787 برائے مزید کارروائی ارسال کی گئی تھی جو درخواست نمبر 1394 مورخہ 23-11-2017 DEO میل کے آفس بھیجی گئی جو درخواست ہذا DEO آفس میل ایبٹ آباد تحت ڈائری نمبر 11161 مورخہ 24-11-2017 درج کی گئی جس سے عیاں ہے کہ سائل نے کوئی غیر حاضری جان بوجھ کر یا عمدانہ کی بلکہ متعلقہ اہلکاران اپنے غیر قانونی غیر مجازانہ وغیر اخلاقی افعال کو چھپانے کی خاطر سائل کی ہی درخواست مورخہ 23-11-2017 کی وجہ سے جملہ غیر قانونی کارروائی کر کے اپنی لاپرواہی پر پردہ ڈالنے کی خاطر سائل کے خلاف جھوٹ پر مبنی الزامات لگا رہے ہیں تاکہ سائل کو اس کے قانونی و آئینی حق سے محروم کیا جاسکے جو متعلقہ اہلکاران کے مزکورہ افعال قابل سزا ہیں مزید یہ کہ سائل کی درخواست جو کہ پرنسپل صاحب مزکورہ مورخہ 18-05-2013 کو بذریعہ ڈائری نمبر 787 پر کارروائی کرنے کے بجائے سائل کو عرصہ دراز بعد نام نہاد چارج شیٹ جاری کی جو کہ E & D رول 2011 صریحاً خلاف ورزی ہے ثبوت ہائے جو کہ مشتمل 4 اوراق ہیں لف ہیں۔ نیز جواب چارج شیٹ کو شوکا ز نوٹس ہذا کا لازمی جز و حصہ تصور فرمایا جاوے۔ تائید میں نقل جواب چارج شیٹ لف ہے۔ مذکورہ وجوہات جواب چارج شیٹ میں موجود ہیں مگر انکو آری کمیٹی نے ان وجوہات بغیر کوئی وجہ بتائے نظر انداز کیا جس بناء پر پورٹ غلط ہے جو قابل اخراج ہے۔

۲۔ یہ کہ فقرہ نمبر ۲ کے جواب میں عرض ہے کہ سائل کے خلاف لگائے گئے الزامات بے بنیاد ہیں اور سفارشات انکو آری کمیٹی قانون و واقعات کے بالکل برعکس ہیں۔

۳۔ یہ کہ فقرہ نمبر ۳ کے جواب میں عرض ہے کہ سائل کو اصالتاً پیش ہو کر اپنے دفاع کا موقع دیا جاوے۔

۴۔ یہ کہ فقرہ نمبر ۴ شوکا ز کے جواب میں عرض ہے کہ سائل کو شوکا ز نوٹس مورخہ: 22/05/2018 بذریعہ ڈاک موصول ہوا

اور جس کا جواب اندر معیار بذریعہ رجسٹر AD دیا جا رہا ہے جسکی ایک نقل سائل کے پاس محفوظ ہے۔

لہذا استدعا ہے کہ شوکا ز نوٹس کو منسوخ کرتے ہوئے سائل کو ملازمت پر معہ سابقہ مراعات ڈیوٹی پر Adjust کیا جاوے۔

المرقوم:- 25-05-2018

عبدالرحمان معلم اسلامیات

Handwritten signature and stamp.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

(24)

Armen "H" ?

1. ND WHEREAS, you Mr. Obaidur Rehman, Theology Teacher, Government High School Kakul, Abbottabad were proceeded for having committed the following gross irregularities which constitute inefficiency, misconduct, corruption and habitually absenting from duty without prior approval of leave under Rule-3 of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011.
2. AND WHEREAS, you were granted Extra Ordinary Leave Without Pay w.e.from 01.5.2009 to 30.4.2011 vide this Office Endst.No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained willful absent from duty w.e.from 01.5.2011 to 20.3.2018 as per report of Principal GHS Kakul vide Memo: No.1421 dated 20.3.2018 and further uptil now.
3. AND WHEREAS, Inquiry Committee was constituted vide this Office Notification issued under Endst: No.3794-98 dated 29.3.2018 to conduct inquiry against you in accordance with law, rules and to provide you full opportunity of defence as well as cross examination the witness against you, if any. Charge Sheet and Statement of Allegations were served upon you through Principal, GHS Kakul vide this Office Memo: No. 3774 dated 29.3.2018.
4. AND WHEREAS, the Inquiry Committee provided you full opportunity of self defence, even to cross examine the evidence against you and submitted its finding/recommendations dated 23.4.2018.
5. AND WHEREAS, Show Cause Notice was served upon you through Principal, GHS Kakul vide this Office Memo: No.5705 dated 11.5.2018 and also on your home address through Registered Post, wherein major penalty of "Dismissal from Service" was tentatively proposed under Rule-4(1) Sub Rule (b)(iv) of Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule,2011.
6. AND WHEREAS you submitted your reply dated 25.5.2018 of the show cause notice which was found unsatisfactory and you were summoned for personal hearing on 07.6.2018 to avail the opportunity of self defence vide this office Memo No.6440 dated 29.5.2018.
7. You appeared for personal hearing on the scheduled date and failed to defend the charges levelled against you.
8. AND By reason of above charges levelled against you have been proved and you are found guilty of habitually/willful absenting from duty without prior approval of leave under Rule-3 of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule-3 of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rule, 2011.

NOW THEREFORE, the Competent Authority in exercise of the power conferred upon him under Rule-4(1) Sub Rule (b)(iv) of Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule,2011 is pleased to impose major penalty of "DISMISSAL FROM SERVICE" upon Mr. Obaidur Rehman, Theology Teacher, Government High School Kakul, Abbottabad with immediate effect.

Sd/-
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst: No. 7466-10 /EB-II/PF/Obaidur Rehman TT

Dated 2/7 /2018

Copy forwarded for information & necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts, Abbottabad.
3. Principal, Govt: High School, Kakul, Abbottabad
4. Mr. Obaidur Rehman, Theology Teacher, Government High School Kakul, Abbottabad resident of House No.T/C 1092, Mohallah Shoab Zai Village & P.O.Nawanshehr, Abbottabad
5. Master File.

Sd/-
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

5/20
Affected
Maid

حکومت خیاب ٹری ای او منافع (میلن) ایسٹ آباد

Amex - I

درخواست: لکھنؤ حاصل مقدمات / نتیجہ شوکارڈوٹس ٹمبری 5705

مخاریہ 05/2018 11 از دفتر DEO (M) ایسٹ آباد و جواب شوکارڈوٹس

نوٹس منجانب سائل

جنان عالی! درخواست ذیل قدر میں ہے

1- یہ کہ سائل نے محکمہ انجوائنٹمنٹ میں تقریباً 22 سال کا داغ نوٹری کی ہے اور

سائل نے محکمہ سے باقاعدہ چھٹی ماہر کی اور اجتناب چھٹی پیر درخواست دی

جو پرنسپل گورنمنٹ سکول مانگل کے باقاعدہ تحت نمبر 787 مورخہ 05/2013 درخواست

سائل مفقہ نمبر 8 دیگر ماخذات DEO (M) ایسٹ آباد کو ارسال کرنے اس کے بعد

سائل نے مفقہ دیار سنگھ اور دفتر DEO (M) ایسٹ آباد کے حکم لگانے تاکہ سائل

کو تعینات کیا جائے مگر ذمہ داران بار بار ذمہ ای طور پر تاریخ دیتے رہے۔

آخر کار سائل نے مورخہ 11/2017 23 کو بند بوند درخواست اپنی تعیناتی /

Adjustment دی جس کے بعد محکمہ نے پیشگی سے اپنے غیر قانونی وغیر مجازان

(D# 5735
dated 28/8/18)

Attested
Mand

افعال پر پردہ ڈالنے کی خاطر مسائل کے خلاف E & D Rule 2011

22 ⁰⁵/₂₀₁₈ تحت کارروائی شروع کی جس پر مسائل کو مورخ

ایک Show Case Notice موصول ہوا جس کا جواب مسائل کے اندر
مہینہ داخل کیا۔

2۔ یہ کہ تا حال مسائل کو کوئی اطلاع / معلومات نسبت کسی / محکمات
کارروائی نہ دی گئی ہیں وہ مسائل درخواست گزار کے تحت قانونی

(R.T.I) کے تحت داخل کر رہے ہیں۔ یہاں مہربانی مسائل کو مکمل
معلومات فراہم کی جاوے گی کیونکہ مسائل قسیمی حقوق کا سوال ہے بصورت
دیگر مسائل محکمہ کے خلاف تحت متعلقہ قانون کارروائی کا مجاز ہو گا۔

27 ⁰⁸/₂₀₁₈ اظہر قوماً

M. S. M. M.

عبدالرحمن محمد اسلامیات گورنمنٹ سکول کوالی
میرا ایڈریس ہے: 0300-8115111
فون نمبر:-

M. S. M. M.

محضور جناب ڈائریکٹر ایجوکیشن سکول اینڈ لیٹرریسی خیبر پختونخواہ پشاور

محکمانہ اپیل برخلاف حکم/نوٹیفکیشن نمبری 7466-70 محررہ 02-07-2018 صادر

شدہ DEO ایبٹ آباد جس کی رو سے اپیلانٹ کو نوکری سے برطرف (Dismiss) کیا

گیا۔ استدعا ہے کہ بمنظوری اپیل ہذا اپیلانٹ کو معہ جملہ سابقہ مراعات کے نوکری پر بحال

فرمایا جاوے

جناب عالی! اپیل ذیل عرض ہے۔

1- یہ کہ اپیلانٹ سرکاری ملازم ہے جو کہ محکمہ تعلیم DEO ایبٹ آباد کی زیر نگرانی عرصہ 21 سال سے ڈیوٹی سرانجام دے رہا ہے۔ جو بوقت چھٹی گورنمنٹ ہائی سکول کاکول میں تعینات تھا۔

31 3/93

2- یہ کہ اپیلانٹ نے مورخہ 01-05-2009 کو عرصہ 2 سال کی چھٹی without pay کے لئے درخواست DEO صاحب کو گزاری۔ جو کہ چھٹی عرصہ 2 سال کی DEO ایبٹ آباد نے منظور فرمائی۔ (نقل درخواست لف ہے)۔

3- یہ کہ سائل دو سال کی چھٹی کے اختتام پر اپیلانٹ نے چھٹی کی توسیع کے لئے دوبارہ درخواست گزاری جو بذریعہ ڈائری نمبر 455 مورخہ 06-09-2011 پر اپیل گورنمنٹ ہائی سکول کاکول نے درخواست اپیلانٹ DEO میل ارسال کر دی اور اپیل نے زبانی طور پر اپیلانٹ کو چھٹی کی منظوری کے بارے میں بتایا کہ اپیلانٹ کی چھٹی منظور ہوئی ہے اور درخواست پر DEO ایبٹ آباد نے Sanction کر دی ہے۔

Attested
Mansoor

4- یہ کہ مذکورہ چھٹی کے اختتام پر پھر اپیلانٹ نے مورخہ 18-05-2013 کو درخواست برائے Adjustment گزاری جو کہ باقاعدہ ڈائری نمبر 787 مورخہ 18-05-2013 کو درخواست DEO میل ارسال کی گئی۔

5- یہ کہ اس کے بعد اپیلانٹ نے متعدد بار پرنسپل اور DEO میل کے دفتر کے چکر لگائے کہ اپیلانٹ کو تعینات/ Adjust کیا جائے۔ مگر ذمہ داران نے ہر بار اپیلانٹ کو زبانی طور پر یہ کہہ کر ٹال دیتے کہ آپ کی درخواست پر کارروائی ہو رہی ہے جوں کوئی تعیناتی کا حکم ہوتا ہے تو آپ کو آگاہ کیا جائے گا۔

6- یہ کہ آخر کار اپیلانٹ نے تھک ہار کہ مورخہ 23-11-2017 کو اپنی تعیناتی کے لئے درخواست پرنسپل گورنمنٹ ہائی سکول کاکول گزاری کہ سائل کو نوکری پر تعینات/ ایڈجسٹ کیا جائے مذکورہ درخواست بحوالہ ڈائری نمبر 1394 مورخہ 23-11-2017 ڈی۔ ای۔ او میل ایبٹ آباد کو ارسال ہوئی جو DEO میل ایبٹ آباد کے پاس بحوالہ ڈائری نمبر 11161 مورخہ 24-11-2017 وصول ہوئی۔ جس سے یہ عیاں ہوتا ہے کہ سائل نے کوئی غیر حاضری جان بوجھ کر نہ کی ہے بلکہ ذمہ داران DEO نے اپنی نااہلی کو چھپانے کے لئے اپیلانٹ کی قبل از وقت دی گئی درخواست پر کوئی حکم صادر نہ کیا جس سے اپیلانٹ کی غیر حاضری کا سوال ہی پیدا نہ ہوتا ہے۔

7- یہ کہ DEO ایبٹ آباد نے اپیلانٹ کی قبل از وقت ارسال شدہ درخواست اور اپنے غیر قانونی و غیر مجازانہ افعال کو چھپانے کی خاطر اپیلانٹ کی درخواست محررہ 23-11-2017 کو بنیاد بنا کر اپیلانٹ کے خلاف انکوائری شروع کر کے اپیلانٹ کو شوکانوٹس جاری کیا جس کا جواب اپیلانٹ نے تفصیلاً جملہ ضروری کاغذات کے دیا۔

Attested
Mansoor

نقل شوکاژ نوٹس و جواب شوکاژ نوٹس لف ہے۔

8- یہ کہ DEO ایٹ آباد نے نام نہاد انکوآٹری کی بناء پر اپیلانٹ کو مورخہ 02-07-2018 کو نوکری سے برطرف/Dismiss کر دیا اور جان بوجھ کر اور اپنے غیر قانونی و غیر مجازانہ افعال پر پردہ ڈالنے کی خاطر کہ اپیلانٹ کو اس غیر قانونی حکم کا علم بروقت نہ ہونے دیا۔ حکم مذکورہ اپیلانٹ کو ارسال کرنے کے بجائے پرنسپل متعلقہ کو کر دیا جس کا ثبوت خود ان کا ریکارڈ ہے۔

9- یہ کہ اپیلانٹ نے جب شوکاژ نوٹس پر کی جانے والی کارروائی اور اس پر آنے والے فیصلہ کے متعلق معلومات حاصل کرنے کے لئے اپیلانٹ نے DEO آفس ایٹ آباد آیا تو ذمہ داران نے اس بابت کوئی معلومات فراہم نہ کی اور نہ ہی حکم ہذا سے مطلع کیا جس پر اپیلانٹ نے بذریعہ وکیل خود RTI قانون کے تحت درخواست گزاری کہ اپیلانٹ کو اس کے خلاف ہونے والی انکوآٹری کے حکم کے بارے میں معلومات فراہم کریں۔ نقل درخواست لف ہے۔

10- یہ کہ اپیلانٹ کی درخواست پر عمل کرتے ہوئے DEO ایٹ آباد نے Covering Letter کے ساتھ صرف حکم/Dismissal Order اپیلانٹ کو ارسال کیا جو اپیلانٹ کو مورخہ 10-09-2018 کو وصول ہوا۔ تائید میں نقل Dismissal Order/ Covering Letter و نقل لفافہ لف ہیں۔ نیز حکم مذکورہ اپیلانٹ کو مورخہ 10-09-2018 کو وصول ہوا اسلئے اپیل اپیلانٹ اندر میعاد

ہے۔

Affected
Mandir

یہ کہ ایپلانٹ کو اپنے دفاع کا کوئی موقع مطابق قانون نہ دیا گیا ہے۔ اس بناء پر بھی نا قابل بحالی و قابل منسوخی ہے مزید یہ کہ ایپلانٹ نے محکمہ تعلیم میں عرصہ تقریباً 21 سال دیانتداری سے نوکری کی اور کبھی بھی کسی غیر قانونی فعل میں ملوث نہ رہا اور نہ ہی محکمہ کو ایپلانٹ سے کوئی شکایت ہوئی۔ ایپلانٹ گھر کا واحد کفیل ہے جس کے بوڑھے ماں باپ اور چھوٹے چھوٹے بچے ہیں جن کا ایپلانٹ کے علاوہ کوئی دیکھ بھال کرنے والا نہ ہے اس لیے ایپلانٹ پر نوکری پر معہ سابقہ مراعات کے ساتھ بحال کرنے کا حقدار ہے۔

یہ کہ انکو آری آئین کی سراسر خلاف ورزی ہے کہ: کسی شخص کو بغیر سُننے اُس کے خلاف فیصلہ صادر نہیں کیا جاسکتا ہے۔ بدیں وجہ ایپلانٹ معہ سابقہ مراعات کے بحالی کا حقدار ہے۔

لہذا استدعا ہے کہ بمختوری اپیل ہذا ایپلانٹ کو معہ سابقہ مراعات کے نوکری پر بحال فرمایا جاوے

المرقوم: 15 ستمبر 2018

عبدالرحمن اسلامیات معلم گورنمنٹ ہائی سکول
- ماکول ایٹ آباد
بند لیو و ایس 3

Attested
Mband

11- یہ کہ ایپلانٹ DEO ایبٹ آباد کے اس غلط خلاف قانون حکم مصدرہ
02-07-2018 کے خلاف دیگر وجوہات کے علاوہ ذیل وجوہات کی بنا پر جناب
کے پاس اپیل ہذا دائر کرتے ہوئے استدعا کرتا ہے کہ ایپلانٹ کو معہ جملہ سابقہ
مراجعات کے ساتھ اپنی نوکری پر بحال فرمایا جاوے اور ذمہ داران کے خلاف برطابق
قانون متعلقہ کارروائی کی جاوے۔

وجوہات اپیل:

الف: یہ کہ حکم زیر اپیل سراسر غلط خلاف قانون و خلاف واقعات ہے اس لیے ناقابل بحالی و
قابل منسوخی ہے۔

ب: یہ کہ ایپلانٹ کے خلاف کوئی انکوائری مخلصانہ طور پر نہ کی گئی ہے بلکہ دفتر میں بیٹھ کر اپنے
سابقہ نااہلی پر پردہ ڈالنے کی خاطر حکم ہذا صادر کیا گیا ہے۔

ج: یہ کہ ایپلانٹ کی درخواست برائے تعیناتی / ایڈجسٹمنٹ محررہ 18-05-2013 پر
بروقت کارروائی نہ کر کے محکمہ نے قانونی غلطی کی جس بنا پر حکم محررہ 02-07-2018
ناقابل بحالی و قابل منسوخی ہے۔

د: یہ کہ ایپلانٹ کو کوئی Personal hearing کا کوئی موقع فراہم نہ کیا گیا اور
ایپلانٹ کے پیش کردہ ریکارڈ شامل شدہ درخواست محررہ 18-05-2013 کو جان
بوجھ کر نظر انداز کیا گیا۔ جو بھی قرین انصاف و تقاضوں کے مترادف ہے اس لیے
ایپلانٹ سابقہ مرعات کے ساتھ بحالی کا حقدار ہے۔

Attested
Mand

32

For instruction see

No. 1394

RP-51 (PD) (Rev)

Received a Registered Parcel Registered Insured Addressed to

Postage Registration Fee Acknowledgement Fee Insurance Fee Late Fee Total

Weight Kg. Value Rs. Sender's Name and Address

If Insured

Signature of Booking Official

Date stamps of Booking Office

15/9/8

Attested
Mbad

وکالت نامہ

کورٹ فیس
قیمتی

بعدالت جناب: **سمروس ٹریبونل خیر پختونخواہ کپشاور**

منجانب: **ایپل انٹ**

محمد الرحمن بنام: **حکومت خیر پختونخواہ منڈی**

دعویٰ اپیل انگرانی آرٹ یا جرم **سمروس اپیل** - باعث تحریر آنکھ

1- مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جوابدہی مقام **ایپل آباد سے لئے** -

حکم نشین انجمن الیٹرو و گیس ہائی کورٹ منڈی آباد بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر ہوں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر یا بروز کچہری کے آگے پیچھے ہونے پر منظر کو کوئی نقصان پہنچے تو ذمہ دار یا اسکے واسطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرداختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل انگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنیکا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد ثالثی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ منسوخی ڈگری یکطرفہ درخواست حکم اتناعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا ایگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کرونگا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے سند ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted

4

Attested

[Signature]

المرقوم
11/01
2019

محمد الرحمن ولد عبد الرحمن
العبد العبد
محلہ شہب زئی لوانڈہ تحصیل ضلع ایپل آباد
1024

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. ____/2019

Obaid ur Rehman

VERSUS

Govt. of Khyber Pakhtunkhwa & others

SERVICE APPEAL

**APPLICATION SOLICITING ADJOURNMENT OF THE
TITLED APPEAL**

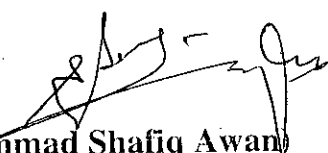
Sheweth; -

1. That the titled appeal is pending disposal before this Honourable Tribunal and is fixed for 22/03/2019 and the applicant is counsel for appellant.
2. That the applicant is unable to appear before this Honourable Tribunal on the date fixed due to illness.

Hence, this application.

It is therefore, prayed that the hearing of the titled appeal may kindly be adjourned.

Dated: 21-03 /2019


(Muhammad Shafiq Awan)
Advocate High Court, Abbottabad
Counsel for Appellant

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 60/2019

Obaid-ur-RehmanAppellant

VERSUS

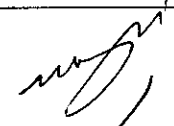
Govt: of Khyber Pakhtunkhwa & Others.....Respondents

Joint Parawise Comments on behalf of Respondents

INDEX

Sr.#	Description	Page No's	Annexure
1	Comments alongwith Affidavit	01 to 04	
✓ 2	Copy of Sanction of EOL letter No. 6599-6600 dated 01-06-2010	05	"A"
✓ 3	Copy of Report of Principal vide letter No. 1421 dated 20-03-2018	06	"B"
✓ 4	Copy of Notification of Inquiry Committee dated 29-03-2018	07	"C"
✓ 5	Copy of letter No. 3774 dated 29-03-2018 regarding Charge Sheet & Statement of Allegation	08 to 10	"D"
✓ 6	Copy of Inquiry Report dated 23-04-2018	11 to 12	"E"
✓ 7	Copy of Dismissal From Service order dated 02-07-2018	13	"F"
✓ 8	Copy of Registered Postal Receipt No. 699 dated 05-07-2019	14	"G"
✓ 9	Copy of proceedings of personal hearing dated 07-06-2018	15	"H"

Dated: 07/08/2019


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

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 60/2019

Obaid-ur-RehmanAppellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

RESPECTFULLY SHEWETH:-

Comments on behalf of respondents are submitted as under:-

Preliminary objections:-

1. That the appellant has no cause of action to file the instant service appeal.
2. That the instant appeal is time barred. Hence liable to be dismissed.
3. That the impugned order was passed on 02-07-2018 whereas he filed his departmental appeal on 15-09-2018.
4. That the instant appeal is not maintainable in its present form.
5. That the appellant has no locus standi to file instant appeal.
6. That the appellant has filed the present appeal just to pressurize the respondents.
7. That the appellant has not come to this Honorable Tribunal with clean hands.
8. That the appellant is estopped to sue due to his own conduct.
9. That the instant appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
10. That the instant appeal is against the rules and policy of the Provincial Government.
11. That the appellant has suppressed the material facts from this Honorable Tribunal, hence, not entitled for any relief and appeal is liable to be dismissed without any further proceeding.

Factual Objections:-

1. That the Para No. 1, of the instant service appeal relates to record.
2. That the Para No. 2 of the service appeal is correct to the extent of sanction of EOL without pay w.e.f 01-05-2009 to 30-04-2011 vide Endst: No. 6599-6600 dated 01-06-2010. As per report of Principal GHS Kakul, Abbottabad vide

letter No. 1421 dated 20-03-2018 appellant remained willful absent from duty w.e.f 01-05-2011 to 20-03-2018 and further up till now. (Copy of letter No. 6599-6600 dated 01-06-2010 and Report of Principal dated 20-03-2018 is annexed herewith as Annexure "A" & "B").

3. That the Para No. 3 of the instant service appeal as composed is incorrect hence, denied as appellant remain willful absent from duty since 01-05-2011 but no sanction regarding extension of EOL was granted.
4. That the Para No. 4 of the instant service appeal as composed is incorrect hence, denied. He himself admitted that he never approached with the high ups regarding sanction of his extension of EOL and posting.
5. That the Para No. 5 of the instant service appeal as composed is incorrect hence, denied. Inquiry Committee was constituted vide Notification No. 3794-98 dated 29-03-2018 to conduct inquiry against appellant in accordance with Law and charge sheet as well as statement of allegation was served against appellant through Principal GHS Kakul, Abbottabad vide office Memo No. 3774 dated 29-03-2018. (Copy of Notification of Inquiry Committee dated 29-03-2018 and letter No. 3774 dated 29-03-2018 regarding charge Sheet & Statement of Allegation are annexed herewith as Annexure "C" & "D").
6. That the Para No. 6 of the instant service appeal is correct to the extent of appointment of inquiry committee while rest of the para as as composed is incorrect hence, denied.
7. That the Para No. 7, of the instant service appeal is correct.
8. That the Para No. 8, of the instant service appeal is correct.
9. That the Para No. 9, of the instant service appeal as composed is incorrect hence, denied. Inquiry was conducted in accordance with law and inquiry committee provided full opportunities of self defence even to the cross examine the evidence against the appellant and submitted its finding/recommendation dated 23-04-2018. (Copy of Inquiry Report dated 23-04-2018 is annexed herewith as Annexure "E").
10. That the Para No. 10, of the instant service appeal as composed is incorrect hence, denied. The charges levelled against appellant have been proved through regular inquiry and major penalty of "**DISMISSAL FROM SERVICE**" was imposed upon appellant after observing all the due process of Law. (Copy of Dismissal From Service order dated 02-07-2018 is annexed herewith as Annexure "F").
11. That the Para No. 11, of the instant service appeal as composed is incorrect hence, denied as the order dated 02-07-2018 was communicated to appellant through registered postal Receipt No. 699 dated 05-07-2018. (Copy of Registered Postal Receipt dated 05-07-2019 is annexed here with as Annexure "G").


12. That the Para No. 12, of the instant service appeal subject to cogent proof. Furthermore, appellant did not file departmental appeal within the statutory period hence, service appeal in hand may please be dismissed without any further proceedings.

13. That the Para No. 13, of the instant service appeal is subject to cogent proof. Hence, instant service appeal may kindly be dismissed inter-alia, on the following grounds:

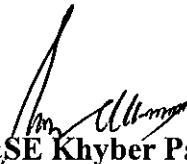
Grounds:-

- a. That the ground a, as composed is incorrect hence, denied.
- b. That the ground b, as composed is incorrect hence, denied.
- c. That the ground c, as composed is incorrect hence, denied.
- d. That the ground d, as composed is incorrect hence, denied as opportunity for personal hearing was provided to appellant and same was availed by him. (Copy of proceedings of personal hearing dated 07-06-2018 is annexed herewith as Annexure "H").
- e. That the grounds e, of the service appeal is subject to cogent proof.
- f. That the ground f, of the service appeal as composed is incorrect hence, denied.
- g. That the respondents seek leave of this Honourable Tribunal to raise additional points/grounds during the course of arguments.

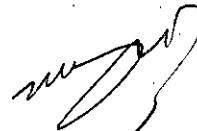
It is, therefore, very humbly prayed that in the light of forgoing comments the service appeal in hand may graciously be dismissed with cost throughout.



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



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



**District Education Officer (M)
Abbottabad
(Respondent No. 3)**

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 60/2019

Obaid-ur-RehmanAppellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

AFFIDAVIT

I, Mr. Qazi Tajjamal Hussain, District Education Officer (M) Abbottabad, do hereby affirm and declare on oath 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

Anx "A"
05

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEM: & SECY: EDU: ABBOTTABAD.

GRANT OF EXTRA ORDINARY LEAVE.

Under the provision of leave rules 1981, sanction is hereby accorded to the grant Extra Ordinary leave without pay w.e.from 01-05-2009 to 30-04-2011 (730-days) in respect of Mr. Ubaidur Rehman Theology teacher Govt: High School Kakul (ATD) , due and admissible to him under the rules.

Necessary entries to this effect should be made in his service book and other relevent record.

[Signature]
EXECUTIVE DISTRICT OFFICER
ELEM: & SECY: EDU: ABBOTTABAD.

Endst: No: 6599-6600 /EB-II/Leave cases, Dated A'Abad the 4-6 /2010.

Copy to:-

1. The Principal Govt: High School Kakul Abbottabad, alongwith S/Book of the teacher concerned.
2. District Account Officer Abbottabad.

Entry made on Page 12 of S Book.

[Signature]
DISTRICT OFFICER
ELEM: & ELEM: & SECY: EDU: A'ABAD.

Annex "B"
06

OFFICE OF THE PRINCIPAL GOVERNMENT HIGH SCHOOL KAKUL ABBOTTABAD

No 1421 Dated 20-03-2018

To

The District Education Officer (M)
Abbottabad

Subject: Application for adjustment I/R Mr. Ubaid ur Rehman Ex TT.

Memo:

Incompliance with your No 2916 /EBII/F.No.5/Leave Cases AT/TT/DM/Qari Dated 07/03/2018, I have the honour to bring in your kind notice that according to the school record said Mr. Ubaid_Ur_Rehman Ex TT of this school was granted 02 years Extra Ordinary leave w.e.f 01-05-2009 to 30-04-2011 vide Endst No 6599-6600 Dated 01-06-2010 and vacated the T.T post at this school. Mean while Mr. Ubedullah T.T was adjusted against the said vacant post on 06-05-2009. As the post was filled hence this institution has no further attendance record about said Mr. Ubaid_ur_Rehman T.T. Another application for 02 years EOL was sent to the DEO (M) vide No 455 dated 06-09-2011. Later on his case was sent to the office along with service book vide no 787 dated 18-05-2013. Hence here is no further record for the said teacher at this institution and he did not performed any duty at this school after 30/04/2009.

ADD (E)

Pl do the
needful

21/3/0/8

Principal
Govt: High School Kakul
Abbottabad

2758
R-318

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

Inquiry Committee comprising the following Officers is hereby constituted to conduct inquiry against Mr. Ubaid-ur-Rehman, Theology Teacher GHS Kakul Abbottabad on account of charges/allegations leveled against him with immediate effect.

1. Syed Amjad Ali, Principal, GHS Sheikhu Bandi Abbottabad.
2. Mr. Abdul Salam Principal, GHS No.4 Abbottabad.

TERMS OF REFERENCES:

To probe into the issues as noted below:-

"The accused was granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to uptil now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018".

The above charges proved gross misconduct and wilful absence from duty on the part of accused. Opportunity of self defense and cross examination be provided to the accused under the rule.

The Inquiry Committee shall submit recommendations/report to the undersigned within ten (10) days.

Encls: 1. Charge Sheet 2. Statement of allegations

sd
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst: No. 3794-98 / EB-1/F.No.5 leave AT/TT/Q/DM Dated 29/3/2018

Copy forwarded to the:-

1. Director Elementary & Secy: Education Khyber Pakhtunkhwa Peshawar.
2. Syed Amjad Ali, Principal, GHS Sheikhu Bandi Abbottabad a/w charge sheet and statement of allegations.
3. Mr. Abdul Salam Principal, GHS No.4 Abbottabad.
4. Principal, GHS Kakul Abbottabad with the remarks to cooperate with the inquiry committee.
5. Mr. Ubaid-ur-Rehman, Theology Teacher GHS Kakul Abbottabad

Receiv
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

No. 3774 / EB-I/F.No.5 leave AT/TT/Q/DM

Dated 29/3/2018

Annex "D"
68

To

The Principal,
GHS Kakul,
Abbottabad.

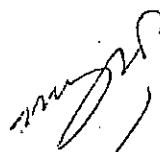
AD



Subject:-
Memo:

CHARGE SHEET AND STATEMENT OF ALLEGATIONS

Enclose please find herewith charge sheet and statement of allegations in
r/o Mr.Ubaid Ur Rehman TT of your school with the direction to serve upon him and
return one copy to this Office as a token of receipt.

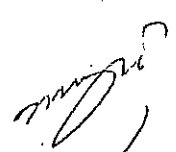

DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

CHARGE SHEET

1. I Qazi Tajammal Hussain, District Education Officer (Male) Abbottabad as Competent Authority, hereby charge you, Mr. Ubaid-ur-Rehman, Theology Teacher, as follows:

That you, while posted as Theology Teacher at GHS Kakul, Abbottabad committed the following irregularities:

- "You were granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to uptil now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018".
2. By reason of the above, you appear to be guilty of willful absent from duty under Rule-3 of the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified Rules of the Rules ibid
3. You are, therefore, required to submit your written defence within ten days of the issuance of this Charge Sheet to the Enquiry Officer, as the case may be.
4. Your written defence, if any, should reach the Inquiry Officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegations is enclosed.


COMPETENT AUTHORITY

Mr. Ubaid-ur-Rehman, Theology Teacher, GHS Kakul, Abbottabad.

DISCIPLINARY ACTION

1. I Qazi Tajammal Hussain , District Education Officer (Male) Abbottabad as competent authority, am of the opinion that Mr.Ubaid Ur Rehman TT GHS Kakul, Abbottabad has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

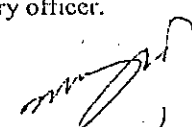
STATEMENT OF ALLEGATIONS

"You were granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to uptil now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018".

2. For the purpose of inquiry of the said accused with reference to the above allegations .Inquiry committee comprising the following officers is hereby constituted under Rule 10 (1) (a) of the ibid rules :

1. Syed Amjad Ali, Principal, GHS Sheikhu Bandi Abbottabad.
2. Mr.Abdul Salam Principal, GHS No.4 Abbottabad.

3. The inquiry committee shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused, record it findings and make, within fifteen days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.
4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer.


COMPETENT AUTHORITY

Mr.Ubaid Ur Rehman TT GHS Kakul Abbottabad

Anx "E"
110

**From the office of the Principal Government High
School Sheikh ul Bandi Abbottabad**

Phone: 0992-9310378

Dated: 23.04.2018

To

The District Education Officer (M)
Abbottabad

Page | 1

Subject: INQUIRY REPORT OF MR. UBAID UR REHMAN, EX TT GHS
KAKUL

Memo:

Reference to the DEO (M) Abbottabad (M) Notification/
Endorsement No: 3794-98/E.B-I/File No: 5 Leave AT/TT/Q/DM
Dated: 29.03.2018, the undersigned officers have probed into the
matter.

**PLACE OF
INQUIRY:**

GHS Kakul and GHS No: 4 Abbottabad

PROCEEDINGS: The undersigned adopted the proceedings given below:

1. The teacher concerned was called on 16.04.2018 at GHS No: 4
Abbottabad and given Statement of Allegations & Charge sheet
issued by your good self. (Annexure: A)
2. He was also given questionnaire separately for proper reply.
(Annexure: B)
3. The undersigned officers also made contact with the Principal GHS
Kakul (on chair) and requested for the available attendance record
w.e.f: 01.05.2009. (Annexure: C)

FINDINGS

Keeping in view the reply and information gathered, the undersigned
is of the opinion that he was charged for his willful absence w.e.f:
01.05.2011 to till date, after the sanction of EOL w.e.f: 01.05.2009 to
30.04.2011 (730days). Hence the findings are as follows:

1. He was appointed as Lab. Assistant at GGHSS Havelian vide DEO
(F) Abbottabad Endst No: 2631-34 Dated: 29.03.1993 as per his
service book. He was appointed as TT at GMS Hazeera vide DEO
(M) Abbottabad Endst No: 19863-93 Dated: 24.07.1993 as per his
service book.

2. He was posted as TT at GHS Kakul on 01.10.1996.

3. His history of Earned Leaves availed at GHS Kakul is as under:

S.#	Period of E.L	Days
01	01.12.2000 to 22.12.2000	22 days
02	16.11.2001 to 15.12.2001	30 days
03	06.12.2007 to 20.12.2007	15 days
04	06.08.2008 to 18.11.2008	105 days
05	19.11.2008 to 20.12.2008	32 days
	Total E.L availed	204 DAYS

4. He applied for EOL w.e.f: 01.05.2009 to 30.04.2011 (730 days) and
sanction was given by the then EDO Abbottabad vide Endst No:
6599-6600 / EB-II Dated: 02.06.2010.

2656
30478

ADD (E.)
for n/19/11

DEO
30/9/18

18

5.

He came to school on 02.05.2013 and applied for the extension of EOL w.e.f: 01.05.2011 to 30.04.2013 (730 days) dully forwarded by the Principal concerned vide his letter No: 787 Dated: 18.05.2013. He again requested for his extended EOL (01.05.2011 to 30.04.2013) and the same was forwarded by the Principal concerned vide his Letter No: 455 Dated: 06.09.2011; but no sanction of that EOL was granted by the EDO Abbottabad as per record and no entries were recorded in his service book.

*

6.

He said that he remained in contact with Mr. Khalid, the then Dealing Assistant but never met regarding sanction of his extended EOL and posting with the then EDO or DY.DEO. He said that he remained in Abbottabad w.e.f: 01.05.2011 to till date. This indicates his open negligence and lack of interest in his service. He never approached the high ups or to any court of law for any kind of relief the sanction and posting other than GHS Kakul.

*

7.

He, in addition to above, remained absent w.e.f: 01.05.2013 to 29.03.2018 (4 years, 10 months and 29 days) without any information, which clearly shows his passive attitude towards govt. service.

8.

He never came to office especially during promotion of TTs to STTs period in December 2012 onwards and failed to contact office regarding inclusion of his name in the seniority list of TTs in District Abbottabad. He, however, performed Hajj in 2015 as per his statement in Annexure B, but no record is available and even his passport was missing. He admitted, during inquiry, that he never approached the then EDO, DY.DEO and DEO (M) Abbottabad, indicating his passive and irresponsible conduct being a govt. servant leading to an appropriate disciplinary action under E& D 2011, which was initiated in 2018. He has received a copy of statement of allegations & charge sheet and has submitted reply.

*

9.

His absence from duty w.e.f: 01.05.2011 to 30.04.2013 (730days) without waiting the approval of leave and w.e.f: 01.5.2013 to 29.03.2018 (1548 days / 4 years 10 months and 29 days) while living in Abbottabad and admitting no contact with the high ups.

All the above period of absence from duty with or without leave is more than five years of leave w.e.f: 01.05.2009 to 29.03.2018. He is, therefore, guilty of 3 (a) and (b) of E& D Rules 2011. Under FR-18, a government servant ceases to be a government servant, who remained absent from duty with or without leave for more than five years. As per record his absence exceeds more than five years from duty, and therefore, FR-18 is applicable to him.

*

RECOMMENDATIONS

In the light of the findings, the following is recommended:

* His services shall be dismissed under Major Penalty 4 (b) - iv of E&D Rules 2011.

Submitted for kind perusal and further necessary action, please.

Abdussalam
Abdussalam
Principal
GHS No: 4 Abbottabad
(Inquiry Officer 1)

Syed Amjad Ali
Syed Amjad Ali
Principal
GHS Sheikh-ul-Bandi, Abbottabad
(Inquiry Officer 2)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

Annex "F"
13



Handwritten signature and date

1. AND WHEREAS, you Mr. Obaidur Rehman, Theology Teacher, Government High School Kakul, Abbottabad were proceeded for having committed the following gross irregularities which constitute inefficiency, misconduct, corruption and habitually absenting from duty without prior approval of leave under Rule-3 of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011.
2. AND WHEREAS, you were granted Extra Ordinary Leave Without Pay w.e.from 01.5.2009 to 30.4.2011 vide this Office Endst.No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained willful absent from duty w.e.from 01.5.2011 to 20.3.2018 as per report of Principal GHS Kakul vide Memo: No.1421 dated 20.3.2018 and further uptil now.
3. AND WHEREAS, Inquiry Committee was constituted vide this Office Notification issued under Endst: No.3794-98 dated 29.3.2018 to conduct inquiry against you in accordance with law, rules and to provide you full opportunity of defence as well as cross examination the witness against you, if any. Charge Sheet and Statement of Allegations were served upon you through Principal, GHS Kakul vide this Office Memo: No. 3774 dated 29.3.2018.
4. AND WHEREAS, the Inquiry Committee provided you full opportunity of self defence, even to cross examine the evidence against you and submitted its finding/recommendations dated 23.4.2018.
5. AND WHEREAS, Show Cause Notice was served upon you through Principal, GHS Kakul vide this Office Memo: No.5705 dated 11.5.2018 and also on your home address through Registered Post, wherein major penalty of "Dismissal from Service" was tentatively proposed under Rule-4(1) Sub Rule (b)(iv) of Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule,2011.
6. AND WHEREAS you submitted your reply dated 25.5.2018 of the show cause notice which was found unsatisfactory and you were summoned for personal hearing on 07.6.2018 to avail the opportunity of self defence vide this office Memo No.6440 dated 29.5.2018.
7. You appeared for personal hearing on the scheduled date and failed to defend the charges levelled against you.
8. AND By reason of above charges levelled against you have been proved and you are found guilty of habitually/willful absenting from duty without prior approval of leave under Rule-3 of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule-3 of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rule, 2011.

NOW THEREFORE, the Competent Authority in exercise of the power conferred upon him under Rule-4(1) Sub Rule (b)(iv) of Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rule,2011 is pleased to impose major penalty of "DISMISSAL FROM SERVICE" upon Mr. Obaidur Rehman, Theology Teacher, Government High School Kakul, Abbottabad with immediate effect.

3/12
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst: No. 7466-10 /EB-II/PF/Obaidur Rehman TT

Dated 2/7 /2018

Copy forwarded for information & necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts, Abbottabad.
3. Principal, Govt: High School, Kakul, Abbottabad
4. Mr. Obaidur Rehman, Theology Teacher, Government High School Kakul, Abbottabad resident of House No.T/C 1092, Mohallah Shoaib Zai Village & P.O.Nawanshehr, Abbottabad
5. Master File.

Handwritten signature
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Annex 20 ²³ ~~22~~
14

No. 699

For Insurance Notices see reverse.
Stamps Affixed except in case of

insured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgment is due.

Received a registered
addressed to

Date-Stamp

Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Initials of Receiving Office

Insured for Rs. (in figures) 21 (in words) Twenty One

Weight: Kilo 100 Grams

Insurance fee Rs. Ps. (in words) 5

Name and address of sender: A. D. S. A.

insured

پرنسپل صدر کیمبریا ہائیڈرولجی کے سربراہان کے نام پر
 18/07/2018

آپ شوکارڈز ٹولس کے جواب کے علاوہ اپنے دماغ
 میں کچھ کیا جا چکے ہیں تو لہذا کچھ کر دیں۔

س

موصولہ شوکارڈز ٹولس کے جواب میں پہلے بھی تفصیل سے جواب دے چکا

ح

ہوں۔ مزید صرف یہی عرض ہے کہ مجھے دوبارہ اپنی پوسٹ پر تعینات

کر کے بحال کیا جائے کیونکہ میں جان بوجھ کر غیر حاضر نہیں رہا میری

کوشش رہی ہے کہ متعلقہ حکام مجھے کسی بھی خالی پوسٹ پر

تعینات کریں میری اب بھی یہی درخواست ہے اور گورنمنٹ کیوری

ہی۔

عبدالرحمن

معلم اسلامیات

3-4783072-13101

(0300-8115111)

Handwritten signature and date: 7/6/18

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 580 /ST Dated 25/03 / 2021


To

The District Education Officer Male,
Government of Khyber Pakhtunkhwa,
Abbotabad.

Subject: - JUDGMENT IN APPEAL NO. 60/2019, MR. OBAID UR REHMAN.

I am directed to forward herewith a certified copy of Judgement dated 16.03.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

(45)

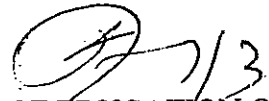
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

/EBII/F.No.5/Leave Casses AT/TT/DM/Qari Dated 07/03 /2018

The Principal,
GHS Kakul Abbottabad.

Subject:- APPLICATION FOR ADJESTMENT
Memo:

I am directed to refer application of Mr. Ubaid ur Rehman Ex-TT of your school received through you Memo, No. 1394 dated 23.11.2017 on the subject noted above and ask you that the teacher concerned remained absent from duty w.e.f. 01.05.2011 to uptil now, whereas his absent report has not been received in this Office so far. You are therefore directed to submit report whether he performed duty during the said period. *or remained absent from duty.*


DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

7/3
7/2

OFFICE OF THE PRINCIPAL GOVERNMENT HIGH SCHOOL KAKUL ABBOTTABAD

No 1416 Dated 06-03-2018

The District Education Officer (M)
Abbottabad

Subject: Mr. Ubaid ur Rehman Ex TT Case

Memo:

Incompliance with your telephonic order regarding Mr. Ubaid_Ur_Rehman Ex TT of this school I have the honour to bring in your kind notice that according to the school record said teacher was granted 02 year Extra Ordinary leave w.e.f 01-05-2009 to 30-04-2011 vide Endst No 6599-6600 Dated 01-06-2010 and vacated the T.T post at this school. Mean while Mr. Ubedullah T.T was adjusted against the said vacant post on 06-05-2009. As the post was filled hence this institution has no further attendance record about said Mr. Ubaid_ur_Rehman T.T. Another application for 02 years EOL was sent to the DEO (M) vide No 455 dated 06-09-2011. Later on this case sent to the office along with service book vide no 787 dated 18-05-2013. Hence here is no further record for the said teacher at this institution.

2139
7-3-18

Principal
Govt. High School Kakul
Abbottabad
GOVT. HIGH SCHOOL
ABBOTTABAD

ADO (E)
Pl. take
further action

5/3/18

OFFICE OF THE PRINCIPAL GOVERNMENT HIGH SCHOOL KAKUL ABBOTTABAD

No 142i Dated 20-03-2015

The District Education Officer (M)
Abbottabad

Subject: Application for adjustment I/R Mr. Ubaid ur Rehman Ex TT.

Memo:

Incompliance with your No 2916 /EBII/F.No.5/Leave Cases AT/TT/DM/Qari Dated 07/03/2018, I have the honour to bring in your kind notice that according to the school record said Mr. Ubaid_Ur_Rehman Ex TT of this school was granted 02 years Extra Ordinary leave w.e.f 01-05-2009 to 30-04-2011 vide Endst No 6599-6600 Dated 01-06-2010 and vacated the T.T post at this school. Mean while Mr. Ubedullah T.T was adjusted against the said vacant post on 06-05-2009. As the post was filled hence this institution has no further attendance record about said Mr. Ubaid_ur_Rehman T.T. Another application for 02 years EOL was sent to the DEO (M) vide No 455 dated 06-09-2011. Later on his case was sent to the office along with service book vide no 787 dated 18-05-2013. Hence here is no further record for the said teacher at this institution and he did not performed any duty at this school after 30/04/2009.

Principal
Govt: High School Kakul
Abbottabad.

ADD (E)

PC do the
needful

21/3/0/8

2758
2378

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب ضلع ایبٹ آباد بوساطت پرنسپل گورنمنٹ سیکنڈری

مضمون: درخواست برائے تعیناتی / ایڈجسٹمنٹ

جناب عالی! گزارش ہے کہ سائل نے یکم مئی 2009 سے 30 اپریل 2011 تک اور پھر یکم مئی 2011 سے 30 اپریل 2013 تک گورنمنٹ سیکنڈری سکول کاکول سے لائٹ لیولی تھی اور چھٹی فہم ہونے پر یکم مئی 2013 کو Arrival report کی تھی لیکن متعدد بار ڈسٹرکٹ آفس کے چکر لگانے کے باوجود تاحال نہ تو مجھے اپنے سکول میں اور نہ ہی کسی اور سٹیشن پر تعینات کیا گیا اور نہ ہی اس عرصہ میں مجھے تنخواہ دی گئی۔

لہذا استدعا ہے کہ سائل کو جلد از جلد معلم اسلامیات کی پوسٹ پر تعیناتی کا حکم صادر فرمایا جائے اور اس عرصہ کی تنخواہ بھی دی جائے تاکہ سائل معاشی مسائل سے چھٹکارا حاصل کر سکے۔

الحاضر

عبد الرحمن (معلم اسلامیات) RT.

تاریخ: 23 نومبر 2017

0300-8115111

Recommended and Forwarded
required to the Competent Authority
with request that use of applicant was
sent to DZO office on 18-05-2013 No 787.
Necessary papers are attached herewith
for further N.A please
Date: 23-11-2017

11161
24-11-17

27/11/2017
ADP
ABAD

EB-II

Put up on file

24/11/017

ADP (E)
As per file

24/11/17

From the office of the Principal Government High
School Sheikh ul Bandi Abbottabad

Phone: 0992-9310378

Dated: 23.04.2018

Page | 1

To

The District Education Officer (M)
Abbottabad

Subject:

INQUIRY REPORT OF MR. UBAID UR REHMAN, EX TT GHS
KAKUL

Memo:

Reference to the DEO (M) Abbottabad (M) Notification/
Endorsement No: 3794-98/E.B-I/File No: 5 Leave AT/TT/Q/DM
Dated: 29.03.2018, the undersigned officers have probed into the
matter.

PLACE OF
INQUIRY:

GHS Kakul and GHS No: 4 Abbottabad

PROCEEDINGS: The undersigned adopted the proceedings given below:

1. The teacher concerned was called on 16.04.2018 at GHS No: 4
Abbottabad and given Statement of Allegations & Charge sheet
issued by your good self. (Annexure: A)
2. He was also given questionnaire separately for proper reply.
(Annexure: B)
3. The undersigned officers also made contact with the Principal GHS
Kakul (on chair) and requested for the available attendance record
w.e.f: 01.05.2009. (Annexure: C)

FINDINGS

Keeping in view the reply and information gathered, the undersigned
is of the opinion that he was charged for his willful absence w.e.f:
01.05.2011 to till date, after the sanction of EOL w.e.f: 01.05.2009 to
30.04.2011 (730days). Hence the findings are as follows:

1. He was appointed as Lab. Assistant at GGHSS Havelian vide DEO
(F) Abbottabad Endst No: 2631-34 Dated: 29.03.1993 as per his
service book. He was appointed as TT at GMS Hazeera vide DEO
(M) Abbottabad Endst No: 19863-93 Dated: 24.07.1993 as per his
service book.

2. He was posted as TT at GHS Kakul on 01.10.1996.

3. His history of Earned Leaves availed at GHS Kakul is as under:

S.#	Period of E.L	Days
01	01.12.2000 to 22.12.2000	22 days
02	16.11.2001 to 15.12.2001	30 days
03	06.12.2007 to 20.12.2007	15 days
04	06.08.2008 to 18.11.2008	105 days
05	19.11.2008 to 20.12.2008	32 days
	Total E.L availed	204 DAYS

4. He applied for EOL w.e.f: 01.05.2009 to 30.04.2011 (730 days) and
sanction was given by the then EDO Abbottabad vide Endst No:
6599-6600 / EB-II Dated: 02.06.2010.

39

2656
30418

ADe(E)
12/11/18
DEC
30/9/15

He came to school on 02.05.2013 and applied for the extension of EOL w.e.f: 01.05.2011 to 30.04.2013 (730 days) dully forwarded by the Principal concerned vide his letter No: 787 Dated: 18.05.2013. He again requested for his extended EOL (01.05.2011 to 30.04.2013) and the same was forwarded by the Principal concerned vide his Letter No: 455 Dated: 06.09.2011; but no sanction of that EOL was granted by the EDO Abbottabad as per record and no entries were recorded in his service book.

Page | 2

- 5.
6. He said that he remained in contact with Mr. Khalid, the then Dealing Assistant but never met regarding sanction of his extended EOL and posting with the then EDO or DY.DEO. He said that he remained in Abbottabad w.e.f: 01.05.2011 to till date. This indicates his open negligence and lack of interest in his service. He never approached the high ups or to any court of law for any kind of relief the sanction and posting other than GHS Kakul.
7. He, in addition to above, remained absent w.e.f: 01.05.2013 to 29.03.2018 (4 years, 10 months and 29 days) without any information, which clearly shows his passive attitude towards govt. service.
8. He never came to office especially during promotion of TTs to STTs period in December 2012 onwards and failed to contact office regarding inclusion of his name in the seniority list of TTs in District Abbottabad. He, however, performed Hajj in 2015 as per his statement in Annexure B, but no record is available and even his passport was missing. He admitted, during inquiry, that he never approached the then EDO, DY.DEO and DEO (M) Abbottabad, indicating his passive and irresponsible conduct being a govt. servant leading to an appropriate disciplinary action under E& D 2011, which was initiated in 2018. He has received a copy of statement of allegations & charge sheet and has submitted reply.
9. His absence from duty w.e.f: 01.05.2011 to 30.04.2013 (730days) without waiting the approval of leave and w.e.f: 01.5.2013 to 29.03.2018 (1548 days / 4 years 10 months and 29 days) while living in Abbottabad and admitting no contact with the high ups.

All the above period of absence from duty with or without leave is more than five years of leave w.e.f: 01.05.2009 to 29.03.2018. He is, therefore, guilty of 3 (a) and (b) of E& D Rules 2011. Under FR-18, a government servant ceases to be a government servant, who remained absent from duty with or without leave for more than five years. As per record his absence exceeds more than five years from duty, and therefore, FR-18 is applicable to him.

RECOMMENDATIONS

In the light of the findings, the following is recommended:

- * His services shall be dismissed under Major Penalty 4 (b) - iv of E&D Rules 2011.

Submitted for kind perusal and further necessary action, please.

Abdussalam
Principal
GHS No: 4 Abbottabad

Syed Amjad Ali
Principal
GHS Sheikh-ul-Bandi, Abbottabad
(Inquiry Officer 2)

Annexure A

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

27

(A)

NOTIFICATION

Inquiry Committee comprising the following Officers is hereby constituted to conduct inquiry against Mr. Ubaid-ur-Rehman, Theology Teacher GHS Kakul Abbottabad on account of charges/allegations leveled against him with immediate effect.

1. Syed Amjad Ali, Principal, GHS Sheikhul Bandi Abbottabad.
2. Mr. Abdul Salam Principal, GHS No.4 Abbottabad.

TERMS OF REFERENCES:

To probe into the issues as noted below:-

"The accused was granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to uptil now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018".

The above charges proved gross misconduct and willful absence from duty on the part of accused. Opportunity of self defense and cross examination be provided to the accused under the rule.

The Inquiry Committee shall submit recommendations/report to the undersigned within ten (10) days.

Encls: 1. Charge Sheet 2. Statement of allegations

SD
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Received
16/04/2018
Mansoor
Principal
GHS Kakul

Endst: No. 3794-98 / EB-I/F.No.5 leave AT/TT/Q/DM Dated 29/3/2018

Copy forwarded to the:-

1. Director Elementary & Secy: Education Khyber Pakhtunkhwa Peshawar.
2. Syed Amjad Ali, Principal, GHS Sheikhul Bandi Abbottabad a/w charge sheet and statement of allegations.
3. Mr. Abdul Salam Principal, GHS No.4 Abbottabad.
4. Principal, GHS Kakul Abbottabad with the remarks to cooperate with the inquiry committee.
5. Mr. Ubaid-ur-Rehman, Theology Teacher GHS Kakul Abbottabad

Received

DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

3774 / EB-I/F.No.5 leave AT/TT/Q/DM

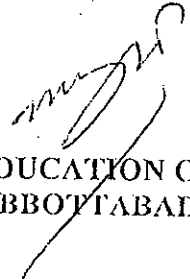
Dated 29/3/2018

(A)
9/0

The Principal,
GHS Kakul,
Abbottabad.

Subject:- CHARGE SHEET AND STATEMENT OF ALLEGATIONS
Memo:

Enclose please find herewith charge sheet and statement of allegations in r/o Mr. Ubaid Ur Rehman TT of your school with the direction to serve upon him and return one copy to this Office as a token of receipt.


DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

CHARGE SHEET

25

1. I Qazi Tajammal Hussain, District Education Officer (Male) Abbottabad as Competent Authority, hereby charge you, Mr. Ubaid-ur-Rehman, Theology Teacher, as follows:

That you, while posted as Theology Teacher at GHS Kakul, Abbottabad committed the following irregularities:

- “You were granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to uptil now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018”.
2. By reason of the above, you appear to be guilty of willful absent from duty under Rule-3 of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified Rules of the Rules ibid
3. You are, therefore, required to submit your written defence within ten days of the issuance of this Charge Sheet to the Enquiry Officer, as the case may be.
4. Your written defence, if any, should reach the Inquiry Officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegations is enclosed.


COMPETENT AUTHORITY

Mr. Ubaid-ur-Rehman, Theology Teacher, GHS Kakul, Abbottabad.

3774 /EB-I/F.No.5/LeaveAT/TT/Q/DM

Dated 29/3/2018

DISCIPLINARY ACTION

1. I Qazi Tajammal Hussain, District Education Officer (Male) Abbottabad as competent authority, am of the opinion that Mr.Ubaid Ur Rehman TT GHS Kakul, Abbottabad has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

"You were granted Extra Ordinary Leave w.e.f. 01.5.2009 to 30.4.2011 (730 days) without pay vide EDO (E&SE) Abbottabad Office Endst: No.6599-6600 dated 01.6.2010. After the expiry of leave, you remained wilful absent from duty w.e.f. 01.5.2011 to upto now without any information/approval of the Competent Authority as per report of Principal, GHS Kakul vide Memo:No.1421 dated 20.3.2018".

2. For the purpose of inquiry of the said accused with reference to the above allegations. Inquiry committee comprising the following officers is hereby constituted under Rule 10 (1) (a) of the ibid rules :

1. Syed Amjad Ali, Principal, GHS Sheikhu Bandi Abbottabad.
2. Mr.Abdul Salam Principal, GHS No.4 Abbottabad.

3. The inquiry committee shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused, record its findings and make, within fifteen days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.
4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer.

COMPETENT AUTHORITY

Mr.Ubaid Ur Rehman TT GHS Kakul Abbottabad

Annexure: B

Dated: 10.04.2018

Mr. Ubaid ur Rehman, EX TT
GHS Kakul

23

Subject: INQUIRY / SHOWCAUSE NOTICE & STATEMENT OF ALLEGATIONS

Memo:

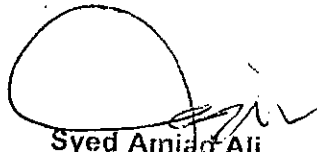
Reference to the DEO (M) Abbottabad (M) Notification / Endorsement No: 3794-98/E.B-I/File No: 5 Leave AT/TT/Q/DM Dated: 29.03.2018, the undersigned Officers are your Inquiry Officer into the matter.

You are hereby directed to appear in the office of Principal GHS No: 4 Abbottabad on 12.04.2018 at 10 AM to clarify your position in written to the show cause notice and statement of allegations issued by DEO (M) Abbottabad vide above quoted letter.

You are also directed to bring copies of sanction of availed leave(s) during the period.

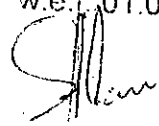
Shaw Case
w/c received
Received
12/04/2018
Mansoor


Abdussalam
Principal
GHS No: 4 Abbottabad
(Inquiry Officer 1)


Syed Anjad Ali
Principal
GHS Sheikh-ul-Bandi, Abbottabad
(Inquiry Officer 2)

Copy for information to:

1. The D.EO (M) Abbottabad w.r to the above quoted letter.
2. The Principal GHS Kakul, Abbottabad with the request to provide copy of Attendance Register for the period 01.05.2009 to 30.04.2011 and sanction of leave w.e.f. 01.05.2009 to 30.04.2011.


Abdussalam
Principal
GHS No: 4 Abbottabad
(Inquiry Officer 1)


Syed Anjad Ali
Principal
GHS Sheikh-ul-Bandi, Abbottabad
(Inquiry Officer 2)

Annexure B

QUESTIONNAIRE FOR MR. UBAID UR REHMAN, EX-TT

Q.1: When you were appointed in the E & SE Department? Please mention the date, school and post of your 1st appointment?

میری تقرری 27/03/1993 کو ریٹائرمنٹ کے بعد گورنمنٹ ٹیچنگ کالج سکول، ہویڈیاں میں ہوئی۔

Q.2: When you were posted as TT at GHS Kakul?

میں گورنمنٹ ہائی سکول، کاکول میں 10/1996ء کو تعینات کیا گیا۔

Q.3: Have you reported to the then Principal GHS Kakul after the expiry of the said EOL sanction w.e.f: 01.05.2009 to 30.04.2011? Answer in YES or NO.

جیسا کہ آئیے کے خلاف 01/05/2009 سے 30/04/2011 تک کی عطلی ہوئی تھی۔ البتہ متعلقہ عطلی کے بعد میں رپورٹنگ کی تھی۔

Q.4: If No, why?

سوال نمبر 3 کے جواب کی روشنی میں اس کا جواب ضروری نہیں۔

Q.5: When did you visit the DEO (M) Office for your posting and to whom you gave you application?

میں نے اپنی آمد Arrived رپورٹ بذریعہ پرنسپل گورنمنٹ ہائی سکول، کاکول، 22/05/2013ء کو دی تھی۔ اس کو پرنسپل نے 18/05/2013ء کو ڈائری نمبر 87 کے تحت DEO کو بھیجا جبکہ درخواست 23/11/2017ء کو بذریعہ پرنسپل GHS کاکول DEO دفتر میں دی۔

Q.6: As per Show cause notice of the DEO (M) E & SE Abbottabad issued to you vide Notification / Endorsement No: 3794-98/E.B-I/File No: 5 Leave AT/TT/Q/DM Dated: 29.03.2018, you are reported willful absent from duty w.e.f: 01.05.2011 to till date? Where were you till date? What do you say in your defense?

میں مذکورہ نوٹس انکوائری کمیٹی کے ذریعہ صرف 16/05/2018ء کو وصول ہوا میں، البتہ: آزاد میں ہی رہا۔ اس کے بعد 29/03/2018ء کو DEO دفتر کے حکمران تیار ہوا۔ 23 نومبر 2017ء کو میں نے اپنی آمد پیش کی اور درخواست جمع کی۔ وہاں نوٹس آئے۔ دفاع میں 16/05/2018ء کو خارج شد۔ رومی آفیسر جان لوہو کر غیر حاضر تھا۔ آئیے کے بعد 23/11/2017ء کو کوئی کارروائی کیوں نہ کی گئی اور مذکورہ نوٹس جین کوئی نوٹس مجھ کو جاری نہ کیا گیا۔ یہاں کوئی تہہ نہیں۔ میں نے یہ وقت پرنسپل، ڈی ایچ او، کاکول کو حاضری رپورٹ کر دی۔ یہ دفتر DEO آئیڈ آر سال کی تھی۔

Q.7: Have you visited abroad during EOL period or absence? If yes, give detail.

میں بیرون ملک صرف حج کی خاطر سال 2015ء میں گیا اور حج کے لیے واپس آیا۔

Q.8: Have you worked somewhere else during the period of your EOL or absence in the country or abroad? Answer in Yes or No.

میں نے دوران عطلی یا بحال ملک یا ملک سے باہر کوئی ملازمت نہیں کی۔

Any other detail you want to add: (Write at the reverse of it)

مزید تفصیل لکھ کر اس کے الٹے سر کے پتے پر تحریر ہے۔

Certificate: I certify that all the answers are correct and if any wrong statement is found against the fact would liable to strict disciplinary action as proposed in the inquiry Rules mentioned in the ESTA CODE 2011.

Dated: 17-04-2018

(Signature)

بخدمت جناب انکوائری کمیٹی ایبٹ آباد

عنوان: جواب چارج شیٹ نمبر 3774 مورخہ 29-03-2018

جناب عالی!

جواب چارج شیٹ ذیل عرض ہے۔

فقہہ نمبر اچھٹی 01-05-2009 تا 30-04-2011 کی حد تک درست ہے۔ بقایا فقرہ جس طرح تحریر ہے سراسر غلط ہے لہذا انکار ہے اصل حقائق یوں ہیں کہ مذکورہ چھٹی کے اختتام پر سائل نے حسب ضابطہ گورنمنٹ ہائی سکول کاکول میں مورخہ 23-08-2011 کو چھٹی میں توسیع متعلقہ اتھارٹی کو بذریعہ ڈائری نمبر 455 مورخہ 06-09-2011 دی جو کہ پرنسپل نے بروقت درخواست کو ارسال کر کے سائل چھٹی منظوری کا زبانی حکم صادر کر دیا کہ سکول نے آپ کی چھٹی پر سنکشن کر دی ہے جو مذکورہ چھٹی کے اختتام پر سائل نے مورخہ 02-05-2013 کو حاضر ہو کر درخواست دی جو کہ پرنسپل نے باقاعدہ تحت 787 مورخہ 18-05-2013 درخواست سائل معہ دیگر ضروری کاغذات ڈسٹرکٹ ایجوکیشن میل کو ارسال کئے۔ اس کے بعد سائل نے متعدد بار سکول و D.E.O آفس برائے تعیناتی چکر لگائے مگر سائل کو زمداران بار بار زبانی طور پر تاریخ دیتے رہے آخر کار سائل نے مورخہ 23-11-2017 کو بذریعہ درخواست اپنی تعیناتی / ایڈجسٹمنٹ پرنسپل صاحب نے اپنے ریمارکس کے ساتھ متعلقہ اتھارٹی کو بھیجا کہ سائل کی درخواست مورخہ 16-05-2013 کو تحت ڈائری نمبر 787 برائے مزید کارروائی ارسال کی گئی تھی جو درخواست نمبر 1394 مورخہ 23-11-2017 DEO میل کے آفس بھیجی گئی جو درخواست ہذا DEO آفس میل ایبٹ آباد تحت ڈائری نمبر 11161 مورخہ 24-11-2017 درج کی گئی جس سے عیاں ہے کہ سائل نے کوئی غیر حاضری جان بوجھ کر یا عمدانہ کی بلکہ متعلقہ اہلکاران اپنے غیر قانونی غیر مجازانہ و غیر اخلاقی افعال کو چھپانے کی خاطر سائل کی ہی درخواست مورخہ 23-11-2017 کی وجہ سے جملہ غیر قانونی کارروائی کر کے اپنی لاپرواہی پر پردہ ڈالنے کی خاطر سائل کے خلاف جھوٹ پڑنی الزامات لگا رہے ہیں تاکہ سائل کو اس کے قانونی و آئینی حق سے محروم کیا جاسکے جو متعلقہ اہلکاران کے مذکورہ افعال قابل سزا ہیں مزید یہ کہ سائل کی درخواست جو کہ پرنسپل صاحب مذکورہ مورخہ 18-05-2013 کو بذریعہ ڈائری نمبر 787 پر کارروائی کرنے کے بجائے سائل کو عرصہ دراز بعد نام نہاد چارج شیٹ جاری کی جو کہ E & D رول 2011 کے مطابق خلاف ورزی ہے ثبوت ہائے جو کہ مشتمل 4 اوراق ہیں لف ہیں۔

۲۔ فقرہ نمبر ۲ چارج شیٹ جس طرح تحریر ہے سراسر غلط ہے لہذا انکار ہے مفصل جواب فقرہ بالا میں دیا گیا ہے۔

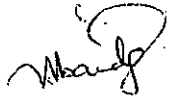
۳۔ فقرہ نمبر ۳ کے جواب میں عرض ہے کہ سائل کو چارج شیٹ مورخہ 16-04-2018 بذریعہ انکوائری آفیسر وصول ہوئی

جس کا جواب آج مورخہ 17-04-2018 کو دیا جا رہا ہے جو اندر میعاد ہے۔

فقہ نمبر ۴۲ کا جواب فقہہ بالا میں دیا جا چکا ہے۔
فقہ نمبر ۵۵ چارج شیٹ کے جواب میں عرض ہے کہ مسائل اصالتاً پیش ہو کر اپنے حقوق کا دفاع کرنے کا خواہاں ہے

حالات مذکورہ بالا کی روشنی میں تقاضہ انصاف و قانون ہے کہ مسائل ناکردہ گناہ ہے اس لئے مسائل کو نوکری پر ہمراہ سابقہ
مراعات و واجبات بحال کرنے کا حکم صادر فرمایا جاوے۔

المقوم :- ۱۷ اپریل ۲۰۱۸



عبدالرحمان معلم اسلامیات

نوٹ :- تمام ضروری کاغذات و دستاویزات اور فوٹو کاپی سروس بک برائے ملاحظہ ہیں

999-90-486942

000 13094

SERVICE
BOOK

20

OF

Technology Teacher
MR. UBAIDUR RAHMAN *Lab Assistant*
S/O ABDUL RAHMAN
Govt. (M) Higher Secondary School Haveli
T.T. GHS KANUL

GS&PE. NWFP.---1923 P.B. 50,900 B.-26-4-89-(561)

Price Rs. 10

GPF#

16659/ess.

Control

T

19

(For use in Police Department only).

Particulars verified
to be - Attested.

Witness
15/8/2020
School
Kakul Abbottabad.

2.

3.

Verification Roll No. dated received back

Passed Samad-ul-Tasleeh from Madrasat Arabia
Darul-Halqam Hazrat Dehaima Alyadi Hafid Nawansheri
Samad No: 129/200 dated 7.9.1992.
Left thumb-impression.

(Signature)
PRINCIPAL
Govt. Secondary School
KAKUL, Abbottabad.

Qualification	Date	Qualifications	Date
English		First Acts	
Fashtu		B. L. or B. A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
Drill instructing	1.	Passed S.S.C. Exam: under R. No: 36800 (Science Group) in 1989(A) from B.I.S.E. Peshawar obtaining 484/850 Marks.	
Court duties			
Reserve duties	2.	Passed Inter: Exam: (Humanities Group) under R. No: 29350 in 1992 (A) from the B.I.S.E. Abbottabad obtaining 625/1100 Marks	

(Signature)
Principal

N. B.—Line to be drawn under the signature of the Principal, Govt. Girls Higher Secondary School, Hazrat Dehaima, Abbottabad.

Previous 2 999-2-486942

No. 00013094

(18)

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

1. Name

UBAIDUR RAHMAN

2. Religion

Islam - PAKISTANI

3. Residence

House No. 7/c 1092, Mohallah Shuaibzai
Village P.O. NAWAN SHARH TEHSIL OF DISTT. ABBOT

4. Father's name and residence

ABDUR RAHMAN - do -

5. Date of birth by Christian era as nearly as can be ascertained

10.4.1971 - Tenth April, One Thousand Nine hundred & Seventy-one.

6. Height in inches by measurement

5' 3"

7. Personal marks for identification

Black Mole on Left Arm

8. Non-wood thumb and Finger impressions of (non-gazetted) officer

Little Finger.

Ring Finger

Middle Finger.

Fore Finger

Thumb.

9. Signature of Government servant.

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

Principal
Govt. Girls Higher Secondary School
Hayelian Abbotabad.

Attested

No. 18/11/71
11/11/71
11/11/71

1	2	3	4	5	6	7
Job: Assistant GHS Havelock TI GMS Hoppers	Off: Temp + Tax Adv: ducts for Fr. II 120/- 1095/1215/- 99.793	Grades: 1095-60-1995 (BPS-7)		1-8 93	1-8 93	
TI: GMS Hoppers	Grades: BPS-9 (Rs. 1185-72-2265)					
TI: GMS Hoppers	Temp: Rs. 1185/- pm					
TI: B/Superior	Rs. 1605/- pm				1-6 94	
TI: B/Superior	Rs. 1605/- pm				23 8 94	
TI: do	Rs. 1700/- pm				1-12 94	
TI: do	Rs. 1799/- pm				1-12 95	
TI: do	Rs. 1799/- pm				8 30/96	
GHS Kakul STD	Rs. 1799/- pm				1-10 96	
do	do					
do	do					
do	do					
do	do					
do	do					
do	do					

Signature
Government
Service

(4)

Placed in BPS 9 inst. 1.8
 being P.A. (II) vide D.O. (S/W) dt. 14.9.93

(5)

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or award or praise of the Government servant.
				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		
				Period	Government to which debitable		
Principal Govt. Girls Higher Secondary School Havelian	21/3/93	Transferred to Govt. Girls Higher Secondary School Havelian	Principal			Appointed as Lab. Ass in BPS 7 vide D.O. (S) Secy Govt. Girls Higher Secondary School Havelian dt. 21.3.93 in under Enclt. No. 2631-34 of 29.3.93 (F.N.)	
Secy Govt. Girls Higher Secondary School Havelian	5/3/94	Scale revised	Secy			Govt. Girls Higher Secondary School Havelian	
Secy Govt. Girls Higher Secondary School Havelian	22/6/94	Transfer	Secy			Services verified w.e.f. 29/3/93 to 31/12/93 from Acq. and other school record	
Secy Govt. Girls Higher Secondary School Havelian	30/11/94	A/O	Secy			Principal Govt. Girls Higher Secondary School Havelian	
Secy Govt. Girls Higher Secondary School Havelian	30/11/95	A/O	Secy			Services verified w.e. from 1-8-93 to 29-8-96 from the Acquittance Roll of office record.	
Secy Govt. Girls Higher Secondary School Havelian	29/8/96	Transfer to Havelian	Secy			Principal Govt. Girls Higher Secondary School Havelian	
Secy Govt. Girls Higher Secondary School Havelian	10/9/96	Transfer to GHS Havelian	Secy			DEO (M) ATD	
Principal Govt. Girls Higher Secondary School Havelian	30/11/96	Annual Increment	Principal			Services Verified from 1-8-96 to 31-12-96 from the Acquittance Roll and other record of the School.	
Principal Govt. Girls Higher Secondary School Havelian	30/11/97	Annual Increment	Principal			Services Verified from 1-10-96 to 30-11-96 from the Acquittance Roll and other record of the School.	
Principal Govt. Girls Higher Secondary School Havelian	30.11.98	Increment	Principal			Services Verified from 1-12-96 to 30-11-97 from the Acquittance Roll and other record of the School.	

17

GOVT. SECONDARY SCHOOL
 HAVELIAN ABBOTTABAD

Approved as I.I. by the ...
 Secy. Abbottabad vide O/O No. 76/T-T dated
 27-4-1993 Formed under Encls. No. 19863-92
 dated 24-7-1993 at S. No. 2

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 4	Date of termination or appointment	Reason of termination (such as promotion, transfer, discharge, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to recorded file or censure record or p of the Govt. Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		
				Period	Government to which debitible	Services Verified from... to...	Roll and other record of...
<i>[Signature]</i>	30-11-99	Annual Leave	<i>[Signature]</i>			<i>[Signature]</i> Principal Govt. Secondary Kakul Abbottabad	Services Verified from... to... Roll and other record of...
<i>[Signature]</i>	30-11-2001	Annual Leave	<i>[Signature]</i> Govt. Secondary School Kakul Abbottabad			<i>[Signature]</i> Principal Govt. Secondary Kakul Abbottabad	Services Verified from... to... Roll and other record of...
<i>[Signature]</i>	30-1-2001	Annual Leave	<i>[Signature]</i>			<i>[Signature]</i> Principal Govt. Secondary Kakul Abbottabad	Services Verified from... to... Roll and other record of...
				3247 7-12-2001		<i>[Signature]</i> Principal Govt. Secondary & Kakul Abbottabad	Services Verified from... to... Roll and other record of...
			<i>[Signature]</i> Principal Govt. Secondary School Kakul Abbottabad	Drawn P. 24-2-12 2001 D = 1570/-		<i>[Signature]</i> Principal Govt. Secondary & Kakul Abbottabad	Services Verified from... to... Roll and other record of...
			<i>[Signature]</i> Principal Govt. Secondary School Kakul Abbottabad	1693 4.1.2001 Drawn Excl Allowance D = 1605/-		<i>[Signature]</i> Principal Govt. Secondary School Kakul Abbottabad	Services Verified from... to... Roll and other record of...
			<i>[Signature]</i> Principal Govt. Secondary School Kakul Abbottabad	17416 1976 Drawn of Salary w. ef 1/13 2001 D = 2968/-		<i>[Signature]</i> Principal Govt. Secondary School Kakul Abbottabad	Services Verified from... to... Roll and other record of...

1	2	3	4	5	6
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 emoluments falling under the term 'pay'
T.T. GHS Kakul	off/Perm		Rs. 2380/- PM		12 1/200
-do-	"		Rs. 3570/- PM		12 1/200
		Revised National Basic Pay Scale w.e.f. 1-12-2001		Rs. 2410-145-4760 BPS-9	

(Admission)
 Appointment
 as EST. was
 recorded in the
 9/5/01
 M. V. P. Peshawar

Please See
 Page 7.

(1994)
 Office of the Accountant General
 P. W. P. Peshawar
 Pay Fixed in accordance with pay scale 1994
 of Rs. 2380/- PM BPS-9
 at Rs. 2380/- PM BPS-9
 with effect from 1-12-2001
 Accounts Officer
 P. W. P. Peshawar

(2002)
 Office of the Accountant General
 P. W. P. Peshawar
 Pay Fixed in accordance with pay scale 2002
 of Rs. 3570/- PM BPS-9
 at Rs. 3570/- PM BPS-9
 with effect from 1-12-2001
 Accounts Officer
 P. W. P. Peshawar

Leave	Allocation of period of leave on average pay pro rata for months for which leave salary is payable to another Government	Period to which Government is debitable		Signature of the head of the office or other attesting officer	Reference recorded in the file of the Government	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 5	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period of leave taken
		Government	debtible							
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										

Handwritten notes at top left of page.

Handwritten notes in the first column.

Handwritten notes in the second column.

Handwritten notes in the third column.

Handwritten notes in the fourth column.

Handwritten notes in the fifth column.

Handwritten notes in the sixth column.

Handwritten notes in the seventh column.

Handwritten notes in the eighth column.

Handwritten notes in the ninth column.

Large handwritten notes in the tenth column.

Handwritten signatures and stamps in the eleventh column.

Handwritten signatures and stamps in the twelfth column.

Handwritten notes in the thirteenth column.

Handwritten signatures and stamps in the fourteenth column.

Handwritten notes in the fifteenth column.

Handwritten notes in the sixteenth column.

Handwritten notes in the seventeenth column.

Handwritten notes in the eighteenth column.

Large handwritten notes at the bottom left of the page.

Small handwritten mark at the bottom center.

Page No. 00015094
 Name: DAVID IR REHMAN
 DES: THEOLOGY TEACHER
 INC No. 99900003189

P. Sec: 002 North
 804007 - GHS KAKUL
 Edu: Education School
 NTN: 0
 EPF No: EDU 014459
 Old A: 99990486940

OF Active Temporary

GROSS PAY AND ALLOWANCES:		804007
1001-Basic Pay		4,752.00
1003-House Rent Allowance		354.00
1000-Medical Allowance		425.00
1770-Spl. Additional allowance		401.00
1800-Special Relief All(2005)		401.00
1801-Adhoc Relief (2005)		401.00
1804-Deernee Allowance (2006)		712.00
Gross Pay and Allowances		8,387.00
DEDUCTIONS:		
MP Balance	40,516.00	
6505-EPF Loan Principal Instal	2,440.00	269.00
3201-Bankment Fund		210.00
3204-Group Insurance		35.00
3149-Exp Edu Fund		44.00
Total Deductions		538.00
		7,849.00

D.O.E 10.04.1971
 12 Years 04 Months 004 Days
 EPF Quota: Payment through DDG.

		Revised pay scale 2005			
		BPS-9 (2770-165-7720)			
Theology Teacher GHS Kakul Abbottabad Cantonment	sub/par	Rs	(4200) 4585/PM	01/07	2005
Principal	sub/par	Rs	4750/PM	01/12	2005
		Rs	4915/PM	01/12	2006
		Pay Scale Reversion 2007			
		BPS-09 (3185-170-3995)			
T-T					
G.H.S Kakul	sub/par	Rs	5655/PM	01/07	2007
		Rs	5845/PM	01/12	2007
T-T					
		BPS-09 (3185) (3920-230-70720)			
G.H.S Kakul	Dec	Rs	7040/PM	01/07	2008
		Rs	7270/PM	01/12	2009

Leave taking

about 4000. Referred to S/O Absentee Rehman T-T 9.4.5 Kakul. do hereby
 take to refund any over payment made in connection revised

Signature of the head of the office or other attesting officer	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded penitance or censure, or reward or praise of the Government servant.
			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		
			Period	Government to which debitable		
M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	30/11/2007	Annual leave	11 months		M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	Service received from 27/11/2002 to 30/11/2007 Roll and other record of the School
M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	30/11/2007	Annual leave	11 months		M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	
M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	30/11/2007	Annual leave	11 months		M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	Drawn Rs 1000/- (Ten thousand) on account of GP fund admissible under rules 15(a) - Revised @ Rs 210.00 PM plus interest. The amount sanctioned by EDO School & Literacy No 15876-77/AB dated 10.7.2003. M. Ashraf Principal Govt. Secondary School Kakul Abbottabad.
M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	30/11/2007	Annual leave	11 months		M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	
M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	30/11/2007	Annual leave	11 months		M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	Drawn Rs 1000/- by Principal on sec s-ATC. vide T-482. 4/8/2003 A-A-O
M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	30/11/2007	Annual leave	11 months		M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	Service received from 1/11/2002 to 30/11/2007 from the Acquittance Roll and other record of the School. M. Ashraf Principal Govt. Secondary School Kakul Abbottabad.
M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	30/11/2007	Annual leave	11 months		M. Ashraf Principal Govt. Secondary School Kakul Abbottabad	Service received from 1/11/2002 to 30/11/2007 from the Acquittance Roll and other record of the School.

S. J. I
 10/1/09
 Pay act in 2011/09
 72207

12

1	2	3	4	5	6	7	
Name of post	Whether substan- tive 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 "Pay"	Date of appointment	Signature Governor Service
<p>2005 OFFICE OF THE ACCOUNTANT GENERAL N.W.E.P. PESHAWAR PAY FIXED IN THE SERVICE BASIC OF RS. 2770-165-7720 45857</p>	<p>1-07-2005 1-07-2005</p>	<p>CFRS AFES ATRS With Nox With Nox</p>	<p>365-180-8585 5657</p>	<p>N.W.E.P. INDEFINITE</p>	<p>7-2007 1-2-2007</p>		<p>Pay Fixation Pay</p>
							<p>Principal KAROL</p>

Granted Extra Ordinary leave without pay
w.e.f 1.5.2009 to 30.4.2011 (two years) vide E.D.O (E4)
Education Abbottabad's E n/c 110.0599-6600/E.S. II/pen
Cases dated 26.2.2010.

Principal
KAROL

F 271 dated 10-5-2009

Drawn leave Salary way 1-9-08

13

18 1/2 months amounting to 27550/-

1	2	10	11	12	Leave		14	15
					Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months for which leave salary is debitable to another Government		
						Period		
							<p>Signature of the head of the office or other attending officer</p> <p>Services Verified from 01-11-2008 to 30-11-2008</p> <p>Roll and other record of the school</p> <p>M. Ashraf PRINCIPAL Govt. Sec. School Kakul, Abbottabad</p>	<p>Records recorded for or census award of the Govt. Servant</p>
							<p>Signature of the head of the office or other attending officer</p> <p>Services Verified from 01-11-2008 to 30-11-2008</p> <p>Roll and other record of the school</p> <p>M. Ashraf PRINCIPAL Govt. Sec. School Kakul, Abbottabad</p>	<p>Records recorded for or census award of the Govt. Servant</p>
							<p>Signature of the head of the office or other attending officer</p> <p>Services Verified from 01-11-2008 to 30-11-2008</p> <p>Roll and other record of the school</p> <p>M. Ashraf PRINCIPAL Govt. Sec. School Kakul, Abbottabad</p>	<p>Records recorded for or census award of the Govt. Servant</p>
							<p>Signature of the head of the office or other attending officer</p> <p>Services Verified from 01-11-2008 to 30-11-2008</p> <p>Roll and other record of the school</p> <p>M. Ashraf PRINCIPAL Govt. Sec. School Kakul, Abbottabad</p>	<p>Records recorded for or census award of the Govt. Servant</p>
							<p>Signature of the head of the office or other attending officer</p> <p>Services Verified from 01-11-2008 to 30-11-2008</p> <p>Roll and other record of the school</p> <p>M. Ashraf PRINCIPAL Govt. Sec. School Kakul, Abbottabad</p>	<p>Records recorded for or census award of the Govt. Servant</p>
							<p>Signature of the head of the office or other attending officer</p> <p>Services Verified from 01-11-2008 to 30-11-2008</p> <p>Roll and other record of the school</p> <p>M. Ashraf PRINCIPAL Govt. Sec. School Kakul, Abbottabad</p>	<p>Records recorded for or census award of the Govt. Servant</p>
							<p>Signature of the head of the office or other attending officer</p> <p>Services Verified from 01-11-2008 to 30-11-2008</p> <p>Roll and other record of the school</p> <p>M. Ashraf PRINCIPAL Govt. Sec. School Kakul, Abbottabad</p>	<p>Records recorded for or census award of the Govt. Servant</p>

9/4/09
Drawn leave Salary on full pay way 1-9-08 to 18-11-08 amounting to 27550/-

District 2016
Comptroller of Accounts
Abbottabad
27/4/09

Granted sanctioned leave on full pay way 1-9-08 to 20-12-2007

full pay with D.O.S

Abbottabad and No: 24
dated: 12-12-2007

S.H.S. PRINCIPAL
ABBOTTABAD

Services verified from 01-11-2007 to 30-11-2007 from the A and other office school record

PRINCIPAL
Govt. Sec. School
Kakul, Abbottabad

granted/sanctioned leave with D.O.S/PTD and No: 166
dated: 29-8-2008
26-08-2008 to 11-11-2008 (16 days)
19-11-2008 to 12-12-2008 (32 days)
out pay

PRINCIPAL (D.D.F)
Govt. Secondary School
KAKUL, ABBOTTABAD

Services Verified from 01-12-2007 to 30-12-2007 from the A and other office school record of the school.

PRINCIPAL

OFFICE OF THE ASSISTANT COMMISSIONER
GOVT. OFFICE SHANWAR
PUNJAB
PAIN PUNJAB

OF NO 3820-230-10720
AT NO 70407 P.M.V.C.F
W. No. Government oil

1-07-2008
1-12-2008

Signature: Roohaver

11

OFFICE OF THE DISTRICT EDUCATION OFFICER(M) SECONDARY ABBOTTABAD.

Office Order No. 76 / 177

Dated A'Abad the 24.7.1993

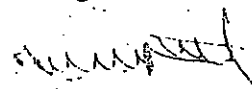
APPOINTMENT.

Consequent upon the approval/recommendation of selection committee and qualifying the prescribed test/interview, the following candidates are hereby temporarily appointed on the post of Theology Teacher in BPS-7 @ Rs.1095-fixed with effect from the date of their taking-over charge.

S.No.	Name of candidates & Address	Name of school where appointed	Remarks.
1.	Jaffar Ali S/O Abdul Rahim R/O Nawanshehr A'Abad	GMS Surjal	Against vac: T.T. Post.
2.	Ubaidur Rehman S/O Abdur Rahim R/O Nawanshehr-Abbottabad.	GMS Hazeera	---do---
3.	Mehboobur Rehman S/O Abdur Rahim R/O Bandi Attai Khan	" Manjia	---do---
4.	Shahir Ahmed S/O Ali Zaman R/O Nagri Bala.	" Bathian	---do---
5.	Muhammad Wajid S/O Ali Bahadar R/O Dheri Maira Abbottabad.	GHS Nagri Tutial	---do---
6.	Muhammad Ilyas S/O Jehanda R/O Salhad-Abbottabad.	GMS Sunna Karaga	---do---
7.	Chanzeb S/O Ali Mardan R/O Keri Raiki-Abbottabad.	" Lahore	---do---
8.	Jamilur Rehman S/O Azizur Rehman R/O Serian Dharm Pani-A'Abad	" S. D. Pani	---do---
9.	Maasoodur Rehman S/O Abdul Hakoem Vill: Faqir Mohd P.O Bodla-A'Abad	" Kangar Maira	---do---
10.	Umar Khatab S/O Qazi Tahir R/O Police line Abbottabad	GMS Chamhad	---do---
11.	Muhammad Iqbal S/O Maasoodur Rehman R/O Kukmong-Abbottabad.	GMS Kukmong	---do---
12.	Shoaib S/O Abdul Karim R/O Nawanshehr-Abbottabad.	" Goreeni	---do---

CONDITIONS:-

1. Charge report should be submitted to all concerned.
2. The appointment is purely on temporary basis and subject to termination at any time without notice or assigning any reason.
3. The Head of Institution/office are required to checked all original documents before handing over charge.
4. They should produce their age and health certificate from the Medical supdt: concerned.
5. In case they wish to resign from service they will have to give one month's prior notice or forfeit one month's pay in lieu of short notice.
6. The appointment shall stand automatically cancelled if they fail to join the post within 15 days of the issue of this order.
7. The candidates should not handed over charge if their age exceeds 30 years or below 18 years.
8. No TA/DA or TG is allowed on fresh appointment.


 Fazal Mahmood,
 Distt. Education Officer (T),
 Secondary Abbottabad.

Endst:No. 19863-92 /AE-IV /TT dated Atd:tho 24/7 /1993.

Copy for information to the:-

1. Divl: Director of Education (Schools) Hazara Div: A'Abad.
- 2-3. District Accounts Officer Abbottabad and Haripur.
- 4-5. Headmaster Government High School Nagri Tutill, Chamhad.
- 6-15. Headmaster Government Middle Schools Surjal, Hazeera, Manjia, Bathiar, Sumar Karaga, Lahoor, Serian Dharm Pani, Kanger Maira, Kukmons and Goreeni.
- 16-28. All candidates concerned.
29. ADEO (Accounts) Local office.
30. Office Order File.

Attested

[Signature]

Safdar Rehman
4/8/93

M.A. M.L.S.
Librarian
Bureau of Curriculum Dev.
& Edu. Extension Services
NWFP, Abbottabad

[Signature]
DISTRICT EDUCATION OFFICER (MALE)
SECONDARY, ABBOTTABAD. 24/7/93

18

Office Order No. 93/TTS

Dated Abbottabad the 22/6/1994

TRANSFER

Mr. Ubaidur Rehman, Theology Teacher Government Middle School Hanoora-Abbottabad is hereby transferred against newly created post of T.T at Government High School Bandi Thundan on ^{his} own pay and grade with effect from the date of his taking over charge.

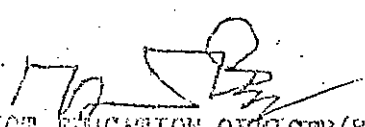
NOTE: Change report should be submitted to all concerned.
NO TA/DA etc; is allowed.

(BARIAN MUHAMMAD IDREES)
DISTRICT EDUCATION OFFICER (S-M)
ABBOTTABAD.

Order No. 93-23-7/1/1994/TTS/DT/AB-IV

Copy to the:-

1. Headmaster Government Middle School Hanoora.
2. Headmaster Government High School Bandi Thundan.
3. ADBO (Accounts) Local office.
4. Office Order File.


DISTRICT EDUCATION OFFICER (S-M)
ABBOTTABAD.

OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE) SECONDARY ABBOTTABAD.

TRANSFER

The following transfer/Adjustment of TTs are hereby ordered in the interest of public service with effect from the date of taking over charge on their own pay & Grade/BPS.

SNO.	NAMES & DESIGNATION/SCHOOL	TRANSFERRED TO	REMARKS
1.	Obaid ur Rehman TT U/T to GHSS, Nawanshehr	GHS, Kakul	vice SNO.2
2.	Muhammad Qasim TT GHS Kakul	GHSS Nawanshehr	""""""""B

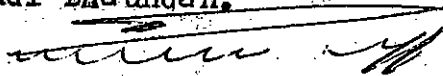
NOTE

1. Charge Reports should be sent to all concerned.
2. No TA/DA/TG is allowed to any one.
3. Mr Obaid ur Rehman TT will get his pay for 9/96 from GHSS, Nawanshehr. He is also adjusted at GHSS Nawanshehr for the purpose of drawal of pay for 9/1996.

(FAZL UR REHMAN)
District Edu: officer(M/S)
A b b o t t a b a d.

Endst No. 11662-65 Dated Abbottabad, the 1/10/1996.

- Copy to:-
1. The Principal, GHSS, Nawanshehr & GHS, Kakul/GHS Dhamtur.
 2. The Headmaster, GMS, Bandi Dhaundan.


District Education officer(M)
A b b o t t a b a d

GRANT OF EXTRA ORDINARY LEAVE.

Under the provision of leave rules 1981, sanction is hereby accorded to the grant Extra Ordinary leave without pay w.e.from 01-05-2009 to 30-04-2011 (730-days) in respect of Mr. Ubaidur Rehman Theology teacher Govt: High School Kekul (ATD), due and admissible to him under the rules.

Necessary entries to this effect should be made in his service book and other relevant record.

[Signature]
EXECUTIVE DISTRICT OFFICER
ELEM: & SECY: EDU: ABBOTTABAD.

Endst: No: 6599-6600 / EB-II/Leave cases, Dated A'Abad the 4-6 /2010.

Copy to:-

1. The Principal Govt: High School Kekul Abbottabad, alongwith S/Book of the teacher concerned.
2. District Account Officer Abbottabad.

*Entry made
on Page 12 of 2 book.*

[Signature]
DISTRICT OFFICER
ELEM: & ELEM: & SECY: EDU: A'ABAD.

3) گورنمنٹ سکول ایبٹ آباد کے پرنسپل کی درخواست پر مقررہ وقت پر

عملوں کی درخواست رائے رائے لکھی

فجائی

گورنمنٹ سکول ایبٹ آباد کے پرنسپل کی درخواست پر مقررہ وقت پر
تبدیلی کے لیے نوٹیفکیشن سکول ایبٹ آباد سے
مقررہ وقت پر - مقررہ وقت پر سکول ایبٹ آباد سے
مقررہ وقت پر سکول ایبٹ آباد سے
مقررہ وقت پر سکول ایبٹ آباد سے
مقررہ وقت پر سکول ایبٹ آباد سے

محمد

4827
23-8-11

اسرار

محمد الرحمان

گورنمنٹ سکول ایبٹ آباد کے پرنسپل کی درخواست پر

تاریخ 23-8-2011

Application received on 15/09/2011

No. 485 dated Kakul the 06/09/2011
Forwarded to the EDO (E & SE) Asad
in original application along with
SPOB for EOL without pay w/e 1-5-20
to 30-4-2011 (two years) for favor;
n/a please

PRINCIPAL 6/9/2011
Govt. Secondary School
KAKUL, Abbottabad

6) محنت ڈسٹرکٹ ایجوکیشن آفیسر صاحب ضلع ایبٹ آباد

مضمون: درخواست رائے یاد دہانی تعیناتی / ایڈمنسٹریٹو

جناب عالی! گزارش ہے کہ سائل نے اس سے قبل بھی درجہ 23 نومبر 2017 کو ریہ ریلوے پرنسپل گورنمنٹ سیکنڈری سکول کاکول ایبٹسمنٹ کے لیے درخواست دی تھی لیکن تا حال نہ تو کسی سکول میں مجھے تعینات کیا گیا اور نہ ہی مجھے تنخواہ ادا کی گئی بلکہ ایجوکیشن آفس آئے پر کسی پیش رفت سے بھی آگاہ نہیں کیا گیا۔

لہذا استدعا ہے کہ سائل کو جلد معلم اسلامیات کی پوسٹ پر ایڈمنسٹریٹو کیا جائے اور گزشتہ پانچ سال کی تنخواہ بھی دی جائے تاکہ سائل سہولتی کے اس دور میں اپنا اور اپنے بچوں کے باعزت روزگار کو ممکن بنا سکے۔

سائل امان مند ہوگا!

الحاج

عبد الرحمن (معلم اسلامیات)
سابقہ گورنمنٹ سیکنڈری سکول کاکول

تاریخ 7 مارچ 2018

0300-8115111

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب ضلع ایبٹ آباد بواسطت پر نیل گورنمنٹ سیکنڈری سکول

معمون: درخواست برائے تعیناتی / ایڈجسٹمنٹ

جناب عالی! گزارش ہے کہ سائل نے یکم مئی 2009 سے 30 اپریل 2011 تک اور پھر یکم مئی 2011 سے 30 اپریل 2013 تک گورنمنٹ سیکنڈری سکول کاکول سے لائنگ لیولی تھی اور چھٹی فتم ہونے پر یکم مئی 2013 کو Arrival report کی تھی لیکن متعدد بار ڈسٹرکٹ آفس کے چکر لگانے کے باوجود تاحال بند تو مجھے اپنے سکول میں اور نہ ہی کسی اور سٹیشن پر تعینات کیا گیا اور نہ ہی اس عرصہ میں مجھے تنخواہ دی گئی۔

لہذا استدعا ہے کہ سائل کو جلد از جلد معلم اسلامیات کی پوسٹ پر تعیناتی کا حکم صادر فرمایا جائے اور اس عرصہ کی تنخواہ بھی دی جائے تاکہ سائل معاشی مسائل سے چھٹکارا حاصل کر سکے۔

الغرض

عبید الرحمن (معلم اسلامیات)

تاریخ: 23 نومبر 2017

0300-8115111

Recommended and Forwarded
replied to the Competent Authority
with request that case of applicant was
sent to DDO office on 18-05-2013 No 787.
Necessary papers are attached along with
for father N.A please.
Date: 22.11.2017

(Signature)
22/11/2017
D.D.O.
ABTABAD

خدمت خدای پرستارین صاحب گریه و غم و سیکندری سکول کراچی ایسٹ ایم ایم

خدای عالی

گزارش پورے سال یکم سنی 2009 سے 30 اپریل 2011 تک

لائسنس لیو پرنٹنگ ہاؤس ایبٹ آباد ٹی ٹی سی کے پاس

6599-6600 تاریخ 02-06-2010 عرصہ 2 سال منظور ہوئی تھی۔

اس کے بعد میں جس کام کیلئے ٹی ٹی سی کے پاس گئے وہ کام نکل نہ سکا پھر میں نا اہل

محوری صورت یکم سنی 2011 تا 30 اپریل 2013 تک چٹی لیسٹ تنخواہ کیلئے درخواست

دی لیکن اب تک چٹی کا سیریل نہ مل سکا ہے میں اب درخواست یکم سنی

2013 کو اپنی ڈیوٹی سنبھال رہا ہوں۔ لہذا عرض ہو کر میری ہامفری رپورٹ

منتظر رہتا کہ شکوہ فرمائیں اور مجھے کسی سکول میں تعینات کیا جائے گا حکم صادر

فرمائیں =

العارض

عبدالرحمان (معلم ابتدائے) سابق لائسنس یافتہ سیکندری سکول کراچی

No 787

02-05-2013

Handwritten signature

Dated 18-05-2013

alongwith servie Book for further or/ action please.
with the servies that the of TT is already filled. (18/5/2013)

PRINCIPAL
Govt. Secondary School,
WAKUL, ABOULLABAD,

حافظی رپورٹ

(3)

میں مسیحی عبید الرحمان معلم اسلامیات ج.م. مورخہ

۰۲ مئی ۲۰۱۳ کو گورنمنٹ سیکنڈری سکول کاکول ایٹ آباد

میں لائٹ لیو لہتم ہونے کے بعد حاضر ہو گیا ہوں۔



عبید الرحمان

معلم اسلامیات گورنمنٹ سیکنڈری سکول

کاکول۔

۰۲-۰۵-۲۰۱۳

Annexure C

2

رجسٹر حاضر و مدرسین ڈیپارٹمنٹ سیکولر اسکول کراچی

نمبر	نظارت خان	مدرسین	ایبٹ آباد	غیر رجسٹرڈ
Code	Dme	PEI	Dist	J.T

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1												
2	87	N-2	2/15	87	N-2	2/15	87	N-2	2/15	87	N-2	2/15
3												
4	87	N-2	2/15	87	N-2	2/15	87	N-2	2/15	87	N-2	2/15
5	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
6	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
7	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
8	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
9	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
10												
11	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
12	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
13	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
14	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
16	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15	87.5	N-2	2/15
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												
31												

School closed for
 summer vacation
 from 16-05-2009 to 26-05-2009
 M.D.P.S.

قسم	حالت	میزان	حالت	میزان	حالت	میزان	حالت	میزان	حالت	میزان
انقاریہ	01	NIL	01	05	04	01	04	02	02	05
استثنائی										
بیماری										
میزان										

قسم حضرت
 انقاریہ
 استثنائی
 بیماری
 میزان

دستخط ہیڈ ماسٹر

