

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

Service Appeal No. 1639/2019

Date of Institution ... 04.12.2019

Date of Decision ... 11.11.2021

Mst. Nazma Ali, Ex-Certified Teacher (BPS-15), GGMS Rajjar,  
District Charsadda.

... (Appellant)

VERSUS

The Director of E&SE Department, Khyber Pakhtunkhwa, Peshawar  
and two others.

... (Respondents)

-----  
MR. UMAR FAROOQ,  
Advocate

--- For appellant.

MR. KABIRULLAH KHATTAK,  
Additional Advocate General


--- For respondents.

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

--- MEMBER (JUDICIAL)  
--- MEMBER (EXECUTIVE)

JUDGMENT:

SALAH-UD-DIN, MEMBER:-

  
Precisely stated the facts as alleged by the appellant in her appeal are that vide Notification dated 28.01.2011, the appellant was appointed as C.T BPS-15 upon recommendations of Departmental Selection Committee; that the appellant after taking charge of her post, performed her duty with zeal and zest in various schools; that the appellant was performing her duties in Government Girls Middle School Rajjar, when her salary was stooped/withheld by the respondents with effect from 01.10.2017 without any reason and justification, therefore; the appellant preferred

2

departmental appeal followed by Service Appeal bearing No. 1504/2018 before this Tribunal; that during the pendency of the aforementioned service appeal, the appellant was dismissed from service vide impugned order dated 19.07.2019, communicated to the appellant on 17.08.2019, which was challenged by the appellant through filing of departmental appeal, however the same was not responded, hence the instant service appeal.

2. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellant in her appeal.

3. Learned counsel for the appellant has contended that the appellant was properly appointed as C.T (Female), upon the recommendations of Departmental Selection Committee and has served in various schools; that the service book of the appellant was prepared and she was receiving salaries till stoppage of the same by the respondents on 01.10.2017; that upon transfer of the appellant to various schools, the concerned officers have verified the appointment order as well as service of the appellant through written letters; that any show-cause notice, charge sheet or statement of allegations was not issued to the appellant and she was condemned unheard; that the appellant was neither issued final show-cause notice nor was she afforded the opportunity of personal hearing; that whole of the proceedings were conducted at the back of the appellant without associating her in the inquiry proceedings, therefore, the impugned order is liable to be set-aside and the appellant is entitled to be reinstated in service with all back benefits. Reliance was placed on 2003 PLC (C.S) 365, 2008 SCMR 1369, 2008 SCMR 609, 2011 SCMR 1618 and 2011 SCMR 1220.

4. On the other hand, learned Additional Advocate General for the respondents has contended that after a thorough inquiry into the matter, the appointment as well as all record pertaining to the service of the appellant was found fake and bogus; that the appellant was associated in the inquiry and

proper opportunity of self defence as well as personal hearing was provided to her; that the inquiry officer has found the appointment order of the appellant as fake and recommended that FIR may be registered against the appellant and the salaries received by her may be recovered and refunded in the government exchequer; that a proper legal inquiry was conducted into the matter by complying all legal and codal formalities, therefore, the impugned order may be kept intact and the appeal in hand may be dismissed. Reliance was placed on judgments dated 28.01.2019, 09.08.2017 and 13.01.2021 rendered by this Tribunal in Service Appeals No. 540/2014, 161/2014 and 13/2018 respectively.


5. Arguments heard and record perused.

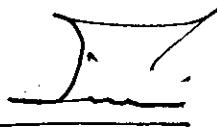
6. A perusal of the record would show that it is the contention of the appellant that she was appointed as C.T (BPS-15) vide notification dated 28.01.2011 upon recommendations of Departmental Selection Committee, where-after she served in various schools and was also receiving salary, which was wrongly and illegally stopped by the respondents with effect from 01.10.2017. On the other hand, it is the contention of respondents that the very appointment order of the appellant was fake, therefore, an inquiry was conducted in the matter and she was dismissed from service vide order dated 19.07.2019. While going through the impugned order dated 19.07.2019, it is evident that the appellant was proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, however it is astonishing that no charge sheet or statement of allegations was issued to the appellant. Similarly, final show-cause notice was also not issued to the appellant. In these circumstances, the proceedings so taken by the respondents cannot be considered a regular inquiry. Moreover, the respondents have not confronted the appellant with the alleged documentary evidence relied by them for declaring the appointment order of the appellant as fake. The respondents have failed to show that the appellant was provided fair

opportunity of defending herself. The appellant has allegedly rendered service of more than 07 years, therefore, in order to meet the end of justice, conducting of a full-fledged inquiry in accordance with relevant law/rules is required for determination of the fact as to whether the appointment order of the appellant was genuine or fake.

7. In view of the above discussion, the appeal in hand is allowed by setting-aside the impugned order and the appellant is reinstated in service with the directions to the respondents to conduct regular inquiry within a period of 90 days of receipt of copy of this judgment. Needless, to mention that the appellant shall be associated with the inquiry by providing her fair opportunity of defending herself. Keeping in view the peculiar nature of the controversy in question, the issue of release of salary of the appellant as well as grant of back benefits shall be subject to final outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
11.11.2021

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

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

11.11.2021

Mr. Umar Farooq, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present. Arguments heard and record perused.

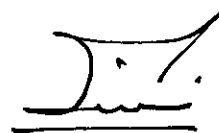
Vide our detailed judgment of today, separately placed on file, the appeal in hand is allowed by setting-aside the impugned order and the appellant is reinstated in service with the directions to the respondents to conduct regular inquiry within a period of 90 days of receipt of copy of this judgment. Needless, to mention that the appellant shall be associated with the inquiry by providing her fair opportunity of defending herself. Keeping in view the peculiar nature of the controversy in question, the issue of release of salary of the appellant as well as grant of back benefits shall be subject to final outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

11.11.2021



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



(Salah-Ud-Din)  
Member (J)

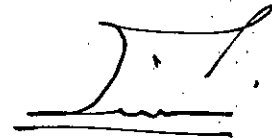
17.06.2021

Clerk of counsel for the appellant present. Mr. Riaz Ahmad Paindakhel, learned Assistant Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 08.10.2021 before D.B.



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

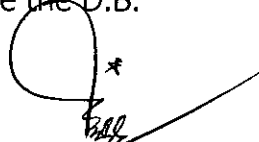


(SALAH-UD-DIN)  
MEMBER (JUDICIARY)

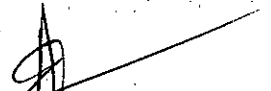
08.10.2021

Counsel for the appellant present. Mr. Kabirullah Khattak, Add. AG for the respondents present.

Since counsel for the appellant in connected appeals is not available, therefore, the appeal at hands is also adjourned. To come up for arguments on 11.11.2021 before the D.B.



(Mian Muhammad)  
Member(Executive)



Chairman

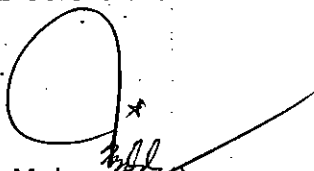
1639/19

22.02.2021

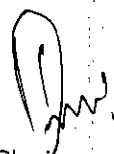
Counsel for the appellant and Addl. AG alongwith Shagufta Rani, ADO (Litigation) for the respondents present.

Learned counsel for the appellant concluded his arguments when the representative of the respondents informed that there were some more pending service appeals regarding the proposition, therefore, requested for time in order to bring on record the particulars pertaining to the other appeals and some documents relevant to the instant appeal.

It is considered appropriate to allow an opportunity to the respondents for doing the needful in order to avoid multiplicity of decision in respect of identical proposition. Adjourned to 10.03.2021 before the D.B.



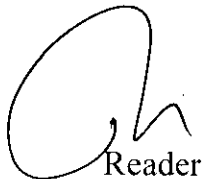
(Mian Muhammad)  
Member(E)



Chairman

10.3.2021

The Worthy Chairman is on leave, therefore, the bench is incomplete. To come up for hearing on 17.06.2021 before the D.B.



Reader

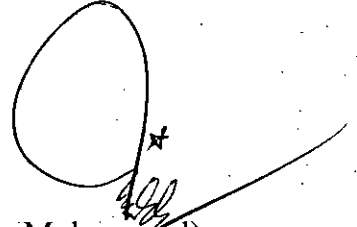
01.10.2020

Counsel for the appellant present.

Mr. Kabirullah, Khattak, Additional Advocate General  
for respondents present.

Written reply on behalf of the respondents not  
submitted. Learned AAG requested for time to submit written  
reply/comments. Requested is allowed.

Adjourned to 24.11.2020 for written reply/comments  
before S.B.

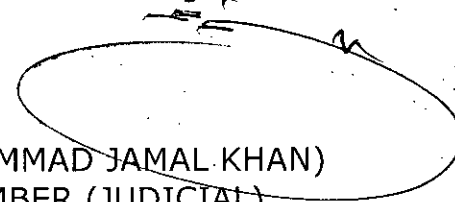


(Mian Muhammad)  
Member (E)

24.11.2020

Counsel for appellant is present. Mr. Kabirullah Khattak,  
Additional Advocate General and Miss. Shagufta Rani, ADEO, for  
the respondents are also present.

Representative of the department submitted written reply  
on behalf of respondents No. 1 to 3, which is made part of  
record. File to come up for rejoinder and arguments on  
22.02.2021 before D.B.



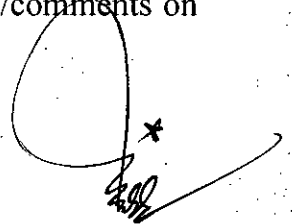
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)



02.04.2020 Due to public holiday on account of COVID-19, the case is adjourned for the same on 25.06.2020 before S.B.

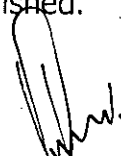
  
Reader

25.06.2020 Junior to counsel for the appellant present. Addl: AG for respondents present. Written reply not submitted. Learned AAG seeks time. To come up for written reply/comments on 12.08.2020 before S.B.

  
MEMBER

12.08.2020 Counsel for the appellant and Addl. AG alongwith Mst. Shagufta Rani, ADO for the respondents present.

The representative of respondents requests for further time to furnish the requisite reply. Adjourned to 01.10.2020 on which date the requisite reply shall positively be furnished.

  
Chairman


20.02.2020

Counsel for the appellant Nazma Ali present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed on the recommendation of Selection Committee as Certified Teacher (BPS-15) vide notification dated 28.01.2011. The appellant was regularly performing her duty. She was imposed major penalty of dismissal from service vide order dated 19.07.2019 on the allegation of fake appointment and the competent authority has also directed for recovery and refund of her salary vide same order. The same was received to the appellant on 17.08.2019, therefore, the appellant filed departmental appeal on 23.08.2019 but the same was not responded, hence, the present service appeal. Learned counsel for the appellant further contended that neither charge sheet, statement of allegation was served upon the appellant nor proper inquiry was conducted nor the appellant was associated in regular inquiry nor any final show-cause notice alongwith copy of inquiry was issued to the appellant. It was further contended that the appellant has already performed her duty therefore, the respondent-department is not competent to recover her salary already received by her on the basis of locus ponententia, therefore, the impugned order is illegal and liable to be set-aside.

The contention raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 02.04.2020 before S.B.

Appellant Deposited  
Security & Process Fee

20/2

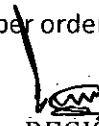


  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 1639/2019 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/12/2019	<p>The appeal of Mst. Nazma Ali presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 4/12/19</p>
2-	05/12/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>10/01/20</u>.</p> <p> CHAIRMAN</p>
	10.01.2020	<p>Nemo for appellant.</p> <p>Notice be issued to appellant/counsel for preliminary hearing on 20.02.2020 before S.B.</p> <p> Chairman</p>

P-39

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

APPEAL NO. 1639 /2019

NAZMA ALI

VS

EDUCATION DEPTT:

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5	Transfer order	<b>D</b>	17.
6	Application & Domicile	<b>E</b>	18- 19.
7	Transfer order dt: 1.3.2013	<b>F</b>	20.
8	Relieving order	<b>G</b>	21.
9	Charge report	<b>H</b>	22- 23.
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APPELLANT

THROUGH:



**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

ROOM NO. 1, UPPER FLOOR,  
NEW ISLAMIA CLUB BUILDING,  
KHYBER BAZAR, PESHAWAR CITY

**0345-9383141**

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

Khyber Pakhtunkhwa  
Service Tribunal

**APPEAL NO. 1639 /2019**

Diary No. 1767

Mst: Nazma Ali, Ex- Certified Teacher (BPS-15),  
GGMS Rajjar, District Charsadda.....

Dated 04/12/19

**APPELLANT**

**VERSUS**

- 1- The Director of E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer (F), District Charsadda.
- 3- The District Accounts Officer, District Charsadda.

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 19.07.2019 COMMUNICATED TO THE APPELLANT THROUGH A REGISTERED ACKNOLEDGMENT ON 17/08/2019 WHEREBY MAJOR PENALTY OF DISMISSAL FROM SERVICE HAS BEEN IMPOSED UPON THE APPELLANT AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 19.07.2019 communicated to the appellant on 17.08.2019 may very kindly be set aside the appellant may be re-instated into service with all back benefits. Any remedy which this august Court deems fit may also be awarded in favor of appellant.

Filed to-day

Registrar

4/12/19

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was appointed as C.T (BPS-15) in the respondent Department on the proper recommendation of Departmental selection committee vide Notification dated 28.1.2011. Copies of the Educational testimonials, appointment order and service book are attached as annexure ..... **A, B & C.**
- 2- That during service the appellant was transferred from GGHS Banian Battagram to GGMS Shamlai, District Battagram vide office order dated 31.1.2011. Copy of the order is attached as annexure ..... **D.**

- 3- That during service at District Battagram the appellant submitted an application for her transfer to her home District i.e. District Charsadda. That the said application of the appellant was accepted by the respondent No.1 and resultantly the appellant was transferred to GGHS Shabqadar Fort, District Charsadda vide order dated 1.3.2013. Copies of the application, domicile and order are attached as annexure ..... **E and F.**
- 4- That in light of the said order dated 1.3.2013 the appellant was relieved from GGHS Banian, Battagram and as such the appellant submitted her charge report at GGHS Shabqadar Fort, District Charsadda vide dated 4.3.2013. That Last Pay certificate was also issued to the appellant by the concerned quarter and as such the appellant started her duty at the concerned station. Copies of the relieving, charge report and LPC are attached as annexure ..... **G, H & I.**
- 5- That the respondent No.2 wrote a letter to the DEO (F), District Battagram for verification of the FA/F.SC certificate of the appellant and accordingly the same was verified by the concerned quarter. Copies of the verification letters are attached as annexure ..... **J.**
- 6- That accordingly the pay of the appellant was released by the respondent No.3. That during service the appellant was further transfer to GGMS Kulalan, Charsadda vide order dated 2.11.2013 and after that to GGMS Rajjar, Charsadda vide order dated 30.7.2015. Copies of the orders are attached as annexure ..... **K & L.**
- 7- That appellant while serving as Certified teacher at the concerned station salaries of the appellant were stopped/withheld by the respondents w.e.f. 1.10.2017 without any reason and clear justification. That feeling aggrieved the appellant preferred Departmental appeal followed by service appeal No.1504/2018 before this august Tribunal and during the pendency of the aforementioned service appeal the respondent No.2 has been issued the impugned order dated 19.07.2019 whereby major penalty of dismissal from service has been imposed on the appellant. Copies of the Departmental appeal, memo of Service appeal and impugned order are attached as annexure ..... **M, N & O.**
- 8- That appellant feeling aggrieved from the impugned order dated 19.07.2019 communicated to the appellant 17.08.2019 preferred Departmental appeal before the respondent No.1 but no reply has been received so far.

Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure.....P.

**GROUND:**

- A- That the impugned order dated 19.07.2019 communicated to the appellant on 17.08.2019 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That the respondent Department acted in arbitrary and malafide manner by while issuing the impugned order dated 19.07.2019 which is not tenable and liable to be set aside.
- D- That the respondent Department has been issued the impugned order dated 19.07.2019 without any plausible reason and clear justification.
- E- That plea of dismissal which has been taken by the respondents is not based on fact, hence the impugned order dated 19.07.2019 is not tenable and liable to be set aside.
- F- That before issuing the impugned order dated 19.07.2019 no charge sheet and statement of allegation has been served on the appellant.
- G- That no show cause notice has been issued to the appellant before issuing the impugned order dated 19.07.2019.
- H- That no chance of personal hearing/defence has been provided to the appellant before issuing the impugned order dated 19.07.2019 which is necessary as per judgment of the Apex Court, before taking punitive action against the Civil Servant.
- I- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 28.11.2019

**APPELLANT**



**NAZMA ALI**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK**

**&**



**MIR ZAMAN SAFI  
ADVOCATES**



No. 9047847

University of Peshawar A-5



Pakistan Detailed Marks Certificate

Bachelor of Arts  
Part-II  
Annual Examination 2010  
District Charsadda



Name: NAZMA ALI  
Father's Name: MUHAMMAD ALI

Gender: Female Roll No: 73070  
Registration No: 2008-PE-11619

Private  
Division: 2nd

Papers	Max. Marks	Marks Obtained	
		In Figures	In Words
English (Comp)	75	29	Twenty Nine
Urdu	75	41	Forty-One
Islamic Studies	75	48	Forty Eight
Pakistan Studies	40	18	Eighteen
<b>Part-I</b>	<b>285</b>	<b>138</b>	<b>One Hundred and Thirty Eight</b>
<b>Part-II</b>	<b>550</b>	<b>274</b>	<b>Two Hundred and Seventy Four</b>

Errors & omissions are subject to subsequent rectification

The Examination was taken in Parts

Examination held From 20-May-2010 to 28-Jun-2010

Result Declared on Monday August 30, 2010

Issue Date: 01 Sep 2010

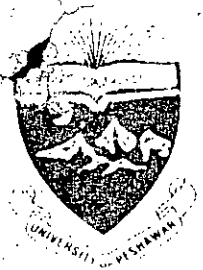
Chances Availed: 2

ATTESTED

(Dr. Mohammad Shafi)  
ADDITIONAL CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

ATTESTED

Prepared by Computer Cell



# University of Peshawar Pakistan

⑤  
①

## Detailed Marks Certificate

Master of Arts in Islamiyat

Final  
Annual Examination 2015

District Charsadda



Private

Name: NAZMA ALI

Gender: Female Roll No: 26674

Father's Name: MUHAMMAD ALI

Registration No: 2008-PE-11619

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In words
Al Quraan Translation 2nd Half & Com with Grammar-VI	100	60	Sixty Only
Usul al-Fiqh(Principles of Islamic Jurisprudence)-VII	100	57	Fifty Seven
Islam & Other World Religions-VIII	100	66	Sixty Six
Contemporary Muslim World-IX	100	53	Fifty Three
Islam, Modern Thought & Islamic Law of Inheritance-X	100	62	Sixty Two
Viva Voce	100	50	Fifty Only
<b>Previous 1224B Annual-2014</b>	<b>500</b>	<b>302</b>	<b>Three Hundred and Two</b>
<b>Final</b>	<b>1100</b>	<b>600</b>	<b>Six Hundred and Sixty</b>

Errors & omissions are subject to subsequent rectification

Chance: 1

The Examination was taken As a Whole

Examinations held from 12-Aug-2015 to 15-Sep-2015

Issue Date: 12 Feb 2016  
10:32 am

ATTESTED

*[Handwritten signature]*

(Prof. Dr. Rashid Khan)  
CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

ATTESTED

*[Handwritten signature]*

Serial No.

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD PROVISIONAL RESULT CARD



6

7

Roll No. W694082  
Registration No. 07NCA0050  
Final Semester AUT-2007

Father's Name: MUHAMMAD ALI  
Address: HOUSE NO. 174, KHEI RAJWAR, P.O. RAJWAR, DISTRICT MUHAMMAD ALI  
Tehsil: CHARSADA  
District: CHARSADA  
has successfully completed **CERTIFICATE OF TEACHING** Programme

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR-07	0632	SCHOOL ORGANIZATION	100	69
SPR-07	0632	EDUCATIONAL PSYCHOLOGY	100	66
SPR-07	0631	DIMENSIONS IN EDUCATION	100	69
SPR-07	0630	TEACHING STRATEGIES & EVALUATION	100	61
SPR-07	0634	LEARNING AND THE TEACHER	100	64
AUT-07	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	80
AUT-07	0605	SOCIAL STUDIES & ITS TEACHING	100	66
AUT-07	0604	URDU LANGUAGE AND ITS TEACHING	100	69
AUT-07	0635	ISLAMIC AND ITS TEACHING	100	72

ATTESTED

Total Marks / Obtained 900 / 606

Percentage / Grade 67 B

CREDITS

Result Declared on SEPTEMBER 27, 2008

Date of issue DECEMBER 07, 2008

**Disclaimer:**

This result card is issued provisionally errors and omission excepted as a notice only. Any entry appearing in this card does not itself confer any right or privilege in connection with the grant of certificate, degree, diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Controller of Examinations

ATTESTED

## RESULT INTIMATION CARD

**POSTAGE PREPAID**  
No postage Required to be Affixed  
Examinations Department AIOU

PROGRAMME: C. T. (WORKSHOP)

SEMESTER:

AUTUMN-07

ROLL NO.: W694382

REGISTRATION NO.:

07NCA0050

NAME: NAZMA ALI

FATHER NAME: MUHAMMAD ALI

ADDRESS: MQH FATIMA KHEL RAJJAR P/O RAJJAR  
D/O MUHAMMAD ALI

CHARBADA

CHARBADA

SR. NO.	COURSE CODE	ASSIGNMENTS		FINAL MARKS				CONFL. MARKS	GRADE	RESULT
		Theory	Practical	Work-Shop	Teach Practice	Exam	Viva			
1	C. T-612 F			80				80	A+	PASS

ATTESTED

Signature of Dealing Official

Controller of Examinations

The result card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not itself confer any right or privilege independently to the grant of a proper Certificate/Degree which will be issued under the Regulations in due course.

29/09/2008

ATTESTED

**APPOINTMENT**

Consequent upon the recommendation of the Departmental Selection Committee and approval of the competent Authority the appointments of the following CT (E) candidates are hereby ordered at the ration of 25% Open Merit BPS-09 @Rs.3820-230-10720) plus usual allowances as admissible under the rules in the interest of public service w.e.f the date of their taking over charge on the terms and conditions given below:-

①  
②  
③  
④  
⑤  
⑥  
⑦  
⑧  
⑨  
B

S.No	Name of Candidates	Name of School where posted	Batch	Remarks
1	Shazia Bibi	GGMS Dubri Sultana Abad	1999	A-V Post
2	Nazma Ali	GGHS Banian	2005	-do-
3	Saima Jabeen	GGMS Shamalai	2006	-do-
4	Bibi Zenat	GGMS M.B./Khail	2007	-do-
5	Saima Zair Gul	GGMS Shinglipayeen	2007	-do-
6	Neelam Shahzadi	GGMS Gidri Khair Abad	2007	-do-
7	Maria Masood	GGMS Gijbori Bar Pow	2008	-do-
8	Mulsina	GGMS Pora	2008	-do-
9	Nagena Naz	GGMS Dabri Sultana Abad	2008	-do-
10	Saima Shouab	GGMS Argashori	2008	-do-
11	Hussan Bibi	GGMS Argashori	2008	-do-

**TERMS AND CONDATIONS.**

1.	Charge report should be submitted to all concerned.
2.	The appointees will get initial allowances as admissible to them under the rules. They will entitle for annual increments as per relevant Govt. policy however they Will not be eligible for pension and gratuity as per current policy of Govt. of KP
3.	The appointees will produce Age & health certificate from the DHO Hospital Battagram
4.	Their service will be considered dead as per rules and regulations of Govt. of KPK.
5.	Contribution of CP Fund will be as per rules and regulations of Govt of KPK
6.	The appointees are bound to take over charge in their respective schools within 15 days after issuance of this order.
7.	Those appointees whose documents proved bogus/fake they will be terminated From their services without serving any notice. They have no right to make approach to the department as will as court. Undertaking will also be recorded in their services books besides they will get no salary till the completion of verification
8.	The appointees will be Governed and dealt with current notified rules and policy of the Govt KPK. Finance Department

ATTESTED

*[Handwritten signature]*

(Muhammad Saeed)  
Executive District Officer (E&SE)  
Battagram

ATTESTED


*[Handwritten signature]*

Endst: No. SS09-14/EB/AE-11/Appointments/2010 dated 28-11-2011

Copy forwarded for Information and necessary action to the:

(S)  
(S)  
(10)

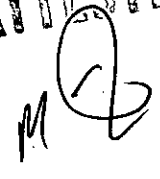
- 1- District Coordination Officer Battagram.
- 2- District Accounts Officer Battagram.
- 3- District Officer (F) Elementary & Secondary Education Battagram.
- 4- Assistant District Officer (B&A) Local Officer.
- 5- Candidates Concerned.

  
District Officer (F)  
Elementary & Secondary Education  
Battagram. *Qnes*

ATTESTED



ATTESTED



(For use in Police Department only).

C-118

Passed B.E.D Examination from Allama Iqbal  
Open University Islamabad session 2015 under  
roll No. 66891  
marks obtained 591/900 result declared  
on 14-01-2016.

Qualification Roll No.

dated

received back

Passed MA Examination from University of  
Peshawar Under R. No 26674 Session 2015

marks obtained 660/1000 result declared  
on 11-02-2016

Left Thumb Impression

Passed SSC exam from P.S.S  
roll No. 009858  
marks obtained 475/850

Qualification

First Arts.

Govt.  
Maqbool Bhatti  
Head Mistress  
Govt. Girls High School  
Peshawar

B.L. or B.A.

Passed P.A. exam from P.S.S  
roll No. 0045348

Pledership examination

marks obtained  
575/1100.

Training School Final examination

Govt.  
Maqbool Bhatti  
Head Mistress  
Govt. Girls High School  
Peshawar

Other qualification

Passed B.A. exam from  
University of Peshawar  
roll No. 26674  
marks obtained 575/850

Passed B.A. exam from  
University of Peshawar  
roll No. 26674  
marks obtained 575/850

MB

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

(12)

Nazma Ali  
Afghan

Chisadda

Name and residence: Mohammed Ali



Birth by Christian era as far as can be ascertained: 02-10-1985  
(2nd October N.H. - Eighty five)



Height by measurement: 5' 6"

Remarks for identification: nil

Thumb and Finger impression  
(Gazetted) officer:

ATTESTED  
*[Signature]*

Index Finger:  Ring Finger: 

Index Finger:  Fore Finger: 



ATTESTED

Signature of Government Servant: Nazma Ali

*[Signature]*

Name and designation of the *[Signature]*



Office	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				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		
10 Ukhtar Head Mistress Govt. Girls High School Banis Bettagram	28/11		<i>[Signature]</i> Janvier Ukhtar Head Mistress Govt. Girls High School Banis Bettagram				
11 Ukhtar Head Mistress Govt. Girls High School Banis Bettagram	30/11		<i>[Signature]</i> Janvier Ukhtar Head Mistress Govt. Girls High School Banis Bettagram				
12 Ukhtar Head Mistress Govt. Girls High School Banis Bettagram	30/11		<i>[Signature]</i> Janvier Ukhtar Head Mistress Govt. Girls High School Banis Bettagram				
13 Ukhtar Head Mistress Govt. Girls High School Banis Bettagram	30/11		<i>[Signature]</i> Janvier Ukhtar Head Mistress Govt. Girls High School Banis Bettagram				
14 Ukhtar Head Mistress Govt. Girls High School Banis Bettagram	30/11		<i>[Signature]</i> Janvier Ukhtar Head Mistress Govt. Girls High School Banis Bettagram				
15 Ukhtar Head Mistress Govt. Girls High School Banis Bettagram	30/11		<i>[Signature]</i> Janvier Ukhtar Head Mistress Govt. Girls High School Banis Bettagram				

Appointed as C.T BPs-09 at 99HS. Banis against vacant post. Issued vide executive District office elementary and secondary Banis Bettagram Bndsk. No. 5509-14 dated 28-1-2011

Service verified with effect from 28/1/2011 from the Acq Roll and other record of this office

ATTEST

Allowed BPs-14 on BA wef. 28-1-2011 vide EDO (ESSE) dt 28/1/2011

Vide upgradation in BPs-15 wef 11/01/11 vide Finance Deptt. PD/50 JRD 10-22/2007 dt 26-08-07 wef. 1-7-2007

*[Signature]*

(14) (B)

1	2	3	4	5	6	7	8
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 the term "pay"	Date of Appointment	Signature Government
CT		BPS No 15 (Rs. 8500 - 700 - 29500)					
G.M.S. Mufti, Abad			Rs. 19300/-			1-6 2014	/
Chaudhary			Rs. 12000/-			1-12 2014	/
		BPS No 15 (Rs. 10985 - 905 - 38135)					
G.M.S. Mufti			Rs. 15510/-			1-7 2015	/
Abad			Rs. 16415/-			1-12 2015	/
<del>do</del>							
G.M.S. Loya			20230/-			1-7 2016	/
Pay special honorarium			21350/-			1-12 2016	/
G.M.S. Loya							

ATTESTED

Mx

10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer.	15 Reference to any recorded punishment or 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		
30/11/2014	A/in	<i>[Signature]</i> D.E.O (F) Charsadda			<i>[Signature]</i>	Source is verified for Rs 2582 on a/c of pay also w/j 3/13
		D.E.O. (F) Charsadda			<i>[Signature]</i>	
	30/11/2015	D.E.O. (F) Charsadda			<i>[Signature]</i>	Office verified W.E.P. 04-3-13 to 04-11-2013 from Attri Roll & Other Record of this Office
	30/6/2016	D. (F) Charsadda			<i>[Signature]</i>	Principal G.H.S. School Shabqadar Fort Charsadda
	30/11/2015	D.E.O. (F) Charsadda			<i>[Signature]</i>	Service verified w-e-t 5-11-2013 to 30-11-2013 from the A.S. Roll and other other record
	30/11/2015	D.E.O (F) Charsadda			<i>[Signature]</i>	<i>[Signature]</i>
	12/3/2014				<i>[Signature]</i>	123/2014 dated 30/5/2014

ATTESTED

*[Signature]*

10	11	12	13		14	15
			Leave			
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to Which debitable	
						<p>Service Verified W-e-t  1-12-2013 To 30-11-2015  from the HRB Rottwell  other office record</p> <p>ATTESTED</p> <p><i>[Signature]</i></p> <p>D. O. (F)  Charsadda</p> <p>Service Verified W-e-t  1-12-2015  Post 16 from the Acq. Rtd.  copy record of this office</p> <p>District Education Officer  (Female) Charsadda</p>

*[Handwritten signature]*

~~16~~ 17

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION BATTGRAM

OFFICE ORDERS:

MST, Nazma Ali CT Govt Girls High school Banian Battgram is directed to perform her duty at Govt Girls Middle School Shamlai till further order.

Her salary will be drawn from her original station, i.e. GGHS Banian.

NOTE: charge report should be submitted to all concerned.

No TA, DA is allowed.

*s d*  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY EDUCATION  
BATTAGRAM

Endst: No 1355-55/EB/AE-II

dated 31-1-12-11

Copy for information to the

1. District Accounts Officer Battagram
3. Headmistress GGHS Banian & GGMS Shamlai
4. Teacher concerned

ATTESTED

*A*

*[Signature]*  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY EDUCATION  
BATTAGRAM

ATTESTED

*M B*

1

E-18

APPLICATION FORM FOR INTER DISTRICT TRANSFER

- 1. Name of the Teacher/Applicant: Nazma Ali
- 2. & District of Domicile: Chaisadda
- 3. Designation/Post held with UPS: CT
- 4. Date of 1<sup>st</sup> Appointment: 28-01-2011
- 5. Date of Taking over charge (District of Present Post): 28-01-2011
- 6. Name of Present School of Posting: GSHS, Banian Bafayam
- 7. Name of School where posting is required 1: District Chaisadda
- 2: any vacant Post
- 3: Domestic Problems
- 8. Reason for Transfer: NIL
- 9. G.P. Fund No: 00693939
- 10. Personal No: NA
- 11. Numbers of CA leave (Availed):
- 12. Signature of P/T/HM/HT
- Signature of ADO in case of Primary Teacher

DD/CS  
 Please  
 H.H.  
 28/2/2013

I solemnly declare that all above information's from S.No 1 to 12 are correct and  
 has been concealed.

Signature: \_\_\_\_\_  
 Name of applicant: Nazma Ali  
 NIC No: [3540117568776]

Certified that I have no objection to the transfer of Mr/Ms: Nazma Ali CT  
 From GSHS, Banian Bafayam to Chaisadda

2. The following arrangement will be made by me for filling up the post of CT  
 in case of transfer of Mr/Ms: Nazma Ali it is certified that:
- (1) The study/education of the students of the school will not suffer with proposed transfer.
  - (2) The applicant is regular employee and not contract (Mention) period

Signature: \_\_\_\_\_  
 I have no objection to the transfer of \_\_\_\_\_  
 Of against a vacant post of CT at (Name of School) Chaisadda  
 I have also examined his/her relevant documents and found correct. I have  
 certified that no NOC has been issued to any other person against this post.

Name of EDO(E&SE): ulfat Begam Signature: \_\_\_\_\_  
 Date: 27/2/2013 Dated: \_\_\_\_\_ Stamp:

- The following documents (Duly attested) should be provided:
- 1. Service Book Photo State
  - 2. 1<sup>st</sup> appointment order (Original or Attested Photo copy co-attested signed by EDO E&SE)
  - 3. Domicile (If previous transfer order (if any) 5) SSC, Intermediate, PTC, CT, H. Ed, etc.
  - 6. Last Pay Roll (If 2) Last Balance Sheet of G.P. Fund

ATTESTED

ATTESTED

*[Handwritten signature]*

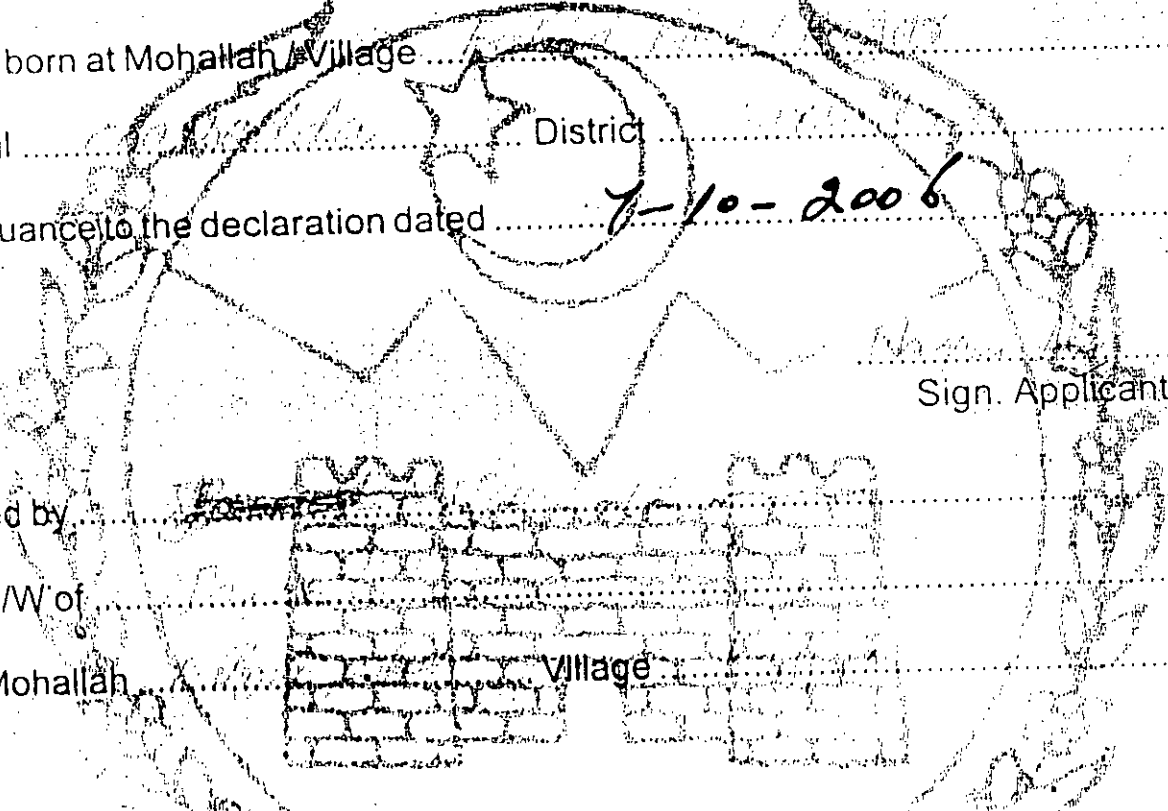
*[Handwritten signature]*

# Domicile Certificate

(18) (19) ✓  
Photo

I declare that I was born of parents who are permanently Domiciled in N.W.F.P. having been born in this province.

I was born at Mohallah / Village .....  
Tehsil ..... District .....  
Pursuance to the declaration dated 7-10-2006



Sign. Applicant

Filled by .....  
S/D/W of .....  
of Mohallah ..... Village .....

domiciled in N.W.F.P. It is hereby Certified that his/her Parents are permanent residents of the N.W.F.P. having born with in it.

I have satisfied myself from ~~my own~~ personal / my own knowledge / verification that the above declaration is true & certified accordingly. This day of 7 / 10 / 2006

ATTESTED

Countersigned  
Distt. Revenue Officer  
District Officer

25241  
7/10/06

Deputy Distt. Revenue Officer  
Office of the District Officer Revenue  
D. R. O.

ATTACHED

M B

F-20

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA

OFFICE ORDER

Consequent upon the approval of the competent authority, Mr. Nazim Ali C.T. Govt. Girls High School Bannan District Battagramme is hereby transferred / adjusted at Govt. Girls High School Shabqadar Fort District Charsadda against CT vacant Post on his own pay and BPS in the interest of public service with effect from the date of his taking over charge.

Note:-

1. Charge report should be sent to all concerned.
2. NOTA/DA etc are allowed.
3. The District Education officer (Female) Charsadda is directed to check all service documents before the release of pay.

DIRECTOR  
Directorate of Elementary & Secondary  
Khyber Pakhtunkhwa Peshawar.

Endst. No. 833-38 / A-167 of 2013

Dated Peshawar the 1/3/2013

Copy for information to the:-

1. District Education Officer (Male) Charsadda / Battagramme
2. District Account Officer Charsadda / Battagramme
3. Principal concerned.
4. Teacher Concerned
5. PA to Director Local Directorate.
6. M/File.

*[Handwritten signature]*

Deputy Director (Estab)  
Directorate of Elementary & Secondary  
Khyber Pakhtunkhwa Peshawar.

*M. K.*

ATTESTED

*[Handwritten signature]*

ATTESTED

*M. K.*





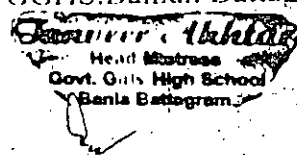
TRANSFER CERTIFICATE

G-20 (21)

Mst: Nazama Ali CT GGHS, Banian, Battagram is hereby relieved of her duty on the fore/after noon of 23/02/2013 in compliance with the order issued by the Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar under Endst No: 1833-38 Dated: 01/03/2013

She is directed to report for his duty to her new station GGHS Shabqadar Fort District Charsadda immediately.

  
Principal  
GGHSS  
Shabqadar Fort (C.H.S.)

  
Head Mistress  
GGHS, Banian Battagram  
  
Head Mistress  
Govt. Girls High School  
Banian Battagram

ATTESTED



H - 22

The Principal  
GGHSS Shabqadar Fort

Subject: - Arrival Report

Consequent upon the orders issued

by Dy. Director EASE Peshawar K.P.K. Endst  
No 1833-38 dated 1-3-2013

I the undersigned is hereby  
Submitted my arrival report to duty i.e.  
on 4-3-2013, in GGHSS Shabqadar Fort  
(Charsadda).

It is requested that arrival  
Report on the above mentioned date may  
kindly, be accepted please.

Thank you  
Nazima Ali

Yours obediently

Nazima Ali C.T.

GGHSS Shabqadar Fort

Principal  
GGHSS  
Shabqadar Fort (CHL)

Accepted ✓

DL

Principal  
GGHSS  
Shabqadar Fort (CHL)  
4-3-2013

ATTESTED

23

CERTIFICATE OF TRANSFER OF CHARGE 04-3-2013 (F.N)

1. Certified that we have on the fore/afternoon of this day respectively made over and receive charge of this office of the Principal GGHSS Shabqadr Fort (CID) transfer of this school vide D.O. No. 958-60 of A.P.R. Peshawar, No. 1933-2013/A-12707-2013 dt. Peshawar 04/3/2013
2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:

Signature of relieved Government servant [Signature]

Designation C.T. (G)

Station GGHSS SRF (CID)

Signature of relieving Government servant [Signature]

Designation C.T. (G)

Dated 04-3-2013

No. 958-60 dt. 04-3-2013

copies to all concerned for necessary action of [Signature]

**Principal**  
Govt Girls Higher Secondary School Shabqadr Fort

[Signature]  
**Principal**  
GGHSS  
Shabqadr Fort (CID)

**ATTESTED**

[Signature]

**LAST PAY CERTIFICATE.**

I - 24

1. Last pay Certificate of Mst Nazma Ali CT (BPS-15)  
Of the GGHS Banian Battagram.  
Proceeding of transfer.  
To GGHS Shabqadar Charsadda..  
2. He has been paid upto 28-02-2013  
At the following rates:-  
Particulars.

Substantive Pay	Pay	9900
Officiating Pay	HRA.	1566
Exchange compensation allowances.	M.A.	1000
	UAA.	1000
	CA	2720
	Adh;Relf-10	2610
	Adh;Relf-11	783
	Adh Relf;12.	1980
	<u>Total Amount.</u>	<u>15133/-</u>

Dedications .

CFP-835/- B/F.180/-  
AGIS-13/- GIS-154 EEF-15/-

*CS*  
*[Signature]*  
District Accounts Officer  
Battagram

- She made over charge of the office on the 7 noon of 7 Battagram.
4. Recoveries are to be made from the pay of the Government Servant as detailed on the reverse.
  5. She has been paid leave salary as detailed below. dedications have been made as on the reverse.

Period.	Rate.	Amount.
From ..... to ..... at Rs.....		.....a month
From ..... to ..... at Rs.....		.....a month
From ..... to ..... at Rs.....		.....a month

6. She is entitled to draw the following.
  7. She is also entitled to joining time for.....days.
  8. The detailed to the Income-Tax recovered from him upto the date from the beginning the current year are noted on the reverse.
- No 7671-72/. Dated 28/2/13/  
Copy forwarded to the:-  
1. District Accounts Officer Charsadda.,  
2. Executive District Officer (E&SE) Charsadda..

ATTESTED

*[Signature]*

HEADMISTRESS  
GGHS, Banian Battagram.

*[Signature]*  
Head Mistress  
Govt. Girls High School  
Banian Battagram.

ATTESTED

*[Signature]*

J-25

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) (E&S) BATTAGRAM.**

NO. 8874 /Verification

Dated 12/4/2013.

To:

The District Education Officer( Female),  
(E&S) Education Charsadda.

**Subject: VERIFICATION OF SERVICE DOCUMENTS.**

Memo:

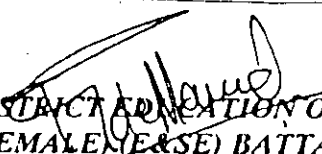
Reference your letter No.2198 Dated 27/03/2013 on the subject noted above.


The transfer orders in respect of Mst;Nazma Ali CT GGHS Banian

Battagram under transfer to GGHS, Shabqadar Fort Charsadda issued vide


Director Elementary & Secondary Education Khyber Pakhtunkawa Peshawar order

Endst No.1833-38 Dated:1-03-2013. Checked with office record verified and found correct.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) (E&S) BATTAGRAM

  
Principal  
GGHSS  
Shabqadr Fort (CHL)

**ATTESTED**



OFFICE OF THE DISTRICT EDUCATION OFFICER  
FEMALE CHARSAJDA  
NO. 2379 /DATED/ 24/4 /13

(23)  
(26)

To

The Principal,  
GGHSS SKF  
Charsajda ✓

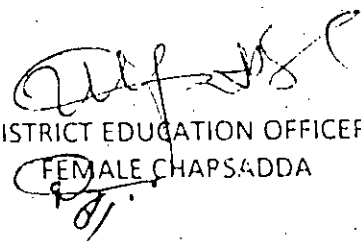
SUBJECT: - VERIFICATION  
Memo

Reference your letter No.961 Dated 15-03-2013 on the subject cited above.

In this connection the undersigned has been deputed Mr Khadim Shah Supdt: Local office for the purpose of verification in respect of Mstt: Nazma Ali CT From the concerned offices.

The Said verification has been made and found correct as per DEO (Female) Battagram letter No. 8874 Dated 17-04-2013 (Copy attached).


You are requested to release the pay of the concerned Mistress after verification of all academic and professional documents.

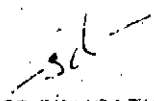
  
DISTRICT EDUCATION OFFICER  
FEMALE CHARSAJDA

Endstt: No. \_\_\_\_\_

Copy to the:

1. Director, E&SE Khyber Pakhtunkhwa Peshawar with reference to his Endstt No.833-38/Dated 01/03 /2013.

  
Principal  
GGHSS  
Shabqadr Fort (CHL)

  
DISTRICT EDUCATION OFFICER  
FEMALE CHARSAJDA

**ATTESTED**



OFFICE OF THE PRINCIPAL  
GCHSS SHABQADAR FORT (CHD).

NO. 973 DATED 22.03.2013.

26

27

To:

The Controller of Examination  
B.I.S.E. Lahore Board.


Subject:- VERIFICATION OF SSC/FA IN R.O. NAZMA ALI D/O  
MUHAMMAD ALI.

Memo:-

I have the honour to enclosed herewith SSC/FA DMC/  
Certificates in the respect of Nazma Ali Muhammad Ali is hereby  
submitted for verification and early return to the undersigned, the  
detail are as under:-

S.No.	Name of Candidate	Father, s Name	R.No.	Session	Marks.	Name of ExamL
1.	Nazma Ali	Muhammed Ali	0092858	2001-A	475	S.S.C.
2	Nazma Ali	Mouammed Ali	0045348	2003-A	593	F.A

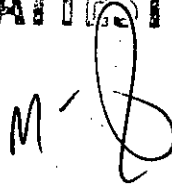
A.C.  
F.

  
Principal  
GCHSS  
Shabqadr Fort (CHD)

PRINCIPAL  
GCHSS SHABQADAR FORT  
SHARSADDA.

No: 00693939

ATTESTED

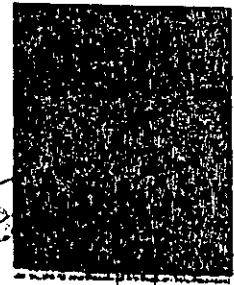
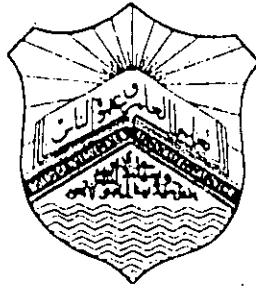


28

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Serial No. 19126

Roll No. 0045348



ATTN

BOARD OF INTERMEDIATE & SECONDARY EDUCATION, LAHORE

Intermediate ANNUAL Examination 2003.

HUMANITIES Group

Certified that NAZMA ALI

Son/Daughter of MUHAMMAD ALI

Registered No. 19894-PVT.-2002

College/District SHEIKHUPURA

has passed the Intermediate Examination, conducted by this Board in FULL as a PRIVATE candidate. He/She offered the subjects and obtained the marks as follows:

Sr.No.	SUBJECTS	MARKS	
		Maximum	Obtained
1.	URDU (COMPULSARY)	200	124
2.	ENGLISH (COMPULSARY)	200	072
3.	ISLAMIATE (COMPULSARY)	50	35
4.	PAKISTAN STUDIES (COMPULSARY)	50	33
5.	EDUCATION	200	100
6.	PUNJABI	200	127
7.	ISLAMIC STUDIES	200	102
<b>TOTAL MARKS (In Figures)</b>		<b>1100</b>	<b>593</b>

(In Words) FIVE HUNDRED NINETY THREE ONLY

External Grade C

Lahore JULY 31, 2003

Handwritten signature of Secretary

SECRETARY

Principal GCHSS Shabqadr Fort (CHL)

Assistant Controller (Records) For Secretary Board of Intermediate & Secondary Education, Lahore

ATTESTED

Handwritten signature for attestation



بکار سرکار پاکستان

3036

29

موجودہ ایڈریس (جہاں تصدیق شدہ کاپی درکار ہے)

3036

گورنمنٹ گھنٹہ گھر، کراچی۔  
ہار۔ ۵

paid required for Bulk Users  
(درجہ ایڈریس - 2 00000 - 30-3-2012)

Principal  
GGHSS  
Shabqadr Fort (CHS)

ATTESTED

817

کار - کار اک

موجودہ ایڈریس (جہاں تصدیق شدہ کاپی درکار ہے)

روز نمبر

م

پورے

29 - سوانیہ روڈ لاہور - 80

Generational Registration Fee  
Paid as Required For Bulk Data

10.3.2012 - 1,000,000

30

30

Principal  
GGHSS  
Shabqadr Fort (CHL)

ATTESTED

M-Q

31  
30  
3

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

OFFICE ORDER

Consequent upon the approval of the competent authority, and relaxation of Ms. Nazma Ali CT B-15 GGHSS Shabqadar, Fort is hereby transferred / posted to GGMS Mufti Abad Kulalan Charsadda on her own pay & BPS in the interest of public service with immediate effect.

Note: -

1. No TADA is allowed
2. Change report should be submitted to all concerned.

(RABIA ANEES)  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADDA

Ends No. 3162-67 / Dated Charsadda the 02-11-13

Copy for Information & Necessary action to the:

1. District Account Office Charsadda.
2. Principal GGHSS Shabqadar Fort Charsadda
3. Head Mistress GGMS, Mufti Abad Kulalan Charsadd
4. B&AO Officer
5. Official Concerned
6. Office File

Rabia Anees 1/11/2013  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADDA

ATTESTED



ATTESTED



OFFICE OF THE PRINCIPAL GGHSS SHABQADAR FORT CHARSAKDA

RELIEVING CHIT —

Mrs Nazma Ali C.T of GGHSS Shabqadar Fort (Charsadda) has been transferred to GGMS Mufti Abad Charsadda order issued by D.E.O (F) Charsadda vide Endst: No. 3162/67 dated 2-11-2013.

You are hereby relieved from your duty today on 01-11-2013 and you are directed to attend at your new station GGMS Mufti Abad Charsadda for further duty immediately.

PRINCIPAL  
GGHSS SHABQADAR FORT  
CHARSAKDA

**ATTESTED**

*M. S.*

39

OFFICE OF THE PRINCIPAL GGNSS SHARQADAR FORT (CHARSABDA).

TELITNYING CHYT.

Mrs. Nazma Ali C.T. of GGNSS Sharqadar Fort (Charsabda) has been transferred to GGMS Mufti Abad Charsabda order issued by DE9 (P) Charsabda vide Kmd No. 8182-07 dated 2-11-2012.

You are hereby relieved from your duty today on 24-11-2012 and you are directed to attend at your New station GGMS Mufti Abad Charsabda for further duty immediately.

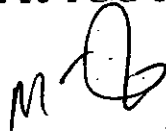
AC  
Principal

PRINCIPAL  
GGNSS SHARQADAR FORT  
CHARSABDA.

ATTESTED



ATTESTED



**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSAJDA.**

**OFFICE ORDER**

Transfer /Adjustment of the following Teachers are hereby ordered on their own pay & BPS to the schools noted against each name in the interest of public service with immediate effect.

S.No	Name of teacher	Designation	From	To	Remarks
1	Taskeen Tabasum	SST (G)	GGHS Dhab Banda	GGHS Sherpau	V.S.No.2
2	Safia Begum	SST (G)	GGHS Sherpau	GGHS Dhab Banda	V.S.No.1
3	Shahzadi Sarwat	SST(Sc)	GGHS Sherpau	GGHS Turangzai	Newly Sanctioned Post
4	Farah Naz	SST (Sc)	GGHS Sheikh Killi	GGCMHS Charsadda	Newly Sanctioned Post
5	Hussan Maab SST(SC) Pay. Math working SST (G)	SST	GGHS Charsadda	GGHS Charsadda	Against SST SST(SC)
6	Shehla Hukh	CT B-15	GGMS Kalyas	GGMS Toor Killi Haleem Abad	A.V.P
7	Tauheed Jamal	SiCT B-16	GGHS Shah Passand Killi	GGHS Dhab Banda	A.V.P
8	Shehla Rahman	CT B-15	GGMS Wardaga	GGMS Umar Abad	A.V.P
9	Mehreen Gul	CT B-15	GGMS Sheikh Abad Nisatta	GGMS Tariq Abad Utrmanzai	A.V.P
10	Nazima Ali	CT B-15	GGMS Mufti Abad Kulalan	GGMS Rajjar	A.V.P
11	Tauheed Begum	Qaria B-12	GGHS Dhab Banda	GGHS Prang	A.V.P
12	Sitara Gul	Qaria B-12	GGHS Sheikh Killi	GGHS Dhab Banda	A.V.P

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

(MISS ZUHRA AKHUNZADA)  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAJDA.

Endstt: No. 2653-57 /Dated/ 30/7 /2015.

Copy to the:

1. PA to Director E&SE Khyber Pakhtunkhwa Peshawar
2. District Account Officer Charsadda.
3. Principal / Head Mistresses Concerned.
4. SDEO (Female) Charsadda.
5. Supdtt Local Office.
6. Official Concerned
7. Office Copy.

*(Signature)*  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAJDA.

ATTESTED

ATTESTED

CERTIFICATE OF TRANSFER OF CHARGE

28

34

I. Certified that I have on the fore/ noon 31/7/2015 of this day respectively made over and received charge of the Office of the CT G.G.M.S.

Rajgarh Charsadda vide DFO (F) and Enrolment 2013/57 dt 31/7/2015

Signature of relieved \_\_\_\_\_

Government Servant: Vacant Post

Designation CT

Station Charsadda

Signature of relieving Nazim Ali

Government Servant Nazim Ali

Designation CT

Dated: 31/07/2015


OFFICE OF THE HEAD MISTRESS CGHS SEHABQADAR FORT CHARSHADDA

No. \_\_\_\_\_ / Dated \_\_\_\_\_ / 2015

Copy for information to the:

1. District Accounts Officer Charsadda.
2. Head Mistress CGHS Behlola.
3. Teacher concerned.
4. Officer record.

**ATTESTED**

M.P.  


**ATTESTED**







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

N-36

APPEAL NO. \_\_\_\_\_/2018

Mst: Nazma Ali, Certified Teacher (BPS-15),  
GGMS Rajjar, District Charsadda..... **APPELLANT**

**VERSUS**

- 1- The Director of E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer (F), District Charsadda.
- 3- The District Accounts Officer, District Charsadda.

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT RELEASING MONTHLY SALARIES OF THE APPELLANT W.E.F. 1~~0~~.201~~8~~ TILL AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the respondents may be directed to release the monthly salaries of the appellant w.e.f. 1~~0~~.201~~8~~ till date. Any remedy which this august Court deems fit may also be awarded in favor of appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was appointed as C.T (BPS-15) in the respondent Department on the proper recommendation of Departmental selection committee vide Notification dated 28.1.2011. Copies of the Educational testimonials, appointment order and service book are attached as annexure ..... **A, B & C.**
- 2- That during service the appellant was transferred from GGHS Banian Battagram to GGMS Shamlai, District Battagram vide office order dated 31.1.2011. Copy of the order is attached as annexure ..... **D.**
- 3- That during service at District Battagram the appellant submitted an application for her transfer to her home District i.e. District Charsadda. That the said application of the appellant was accepted by the respondent No. 1 and

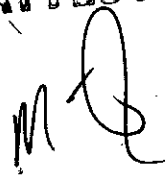
**ATTESTED**  
M

- C- That the respondent Department acted in arbitrary and malafide manner by not releasing monthly salaries of the appellant w.e.f. 1.10.2017 till date.
- D- That the appellant has been discriminated by the respondent Department on the subject noted above and as such the respondent violated the principle of natural justice.
- E- That the domicile and educational testimonials of the appellant have properly been verified by the concerned authority but inspite of that the respondents stopped/withheld the salaries of the appellant w.e.f. 1.10.2017 till date.
- F- That the respondent Department also violated the principle of "WORK DONE MUST PAID" by not releasing the monthly salaries of the appellant w.e.f. 1.10.2017 till date.
- G- That the respondents violated Article 11 of the Constitution of Pakistan 1973 read with Section 17 of the Civil servant Act, 1973 by not releasing monthly salaries of the appellant w.e.f. 1.10.2017 till date.
- H- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 7.12.2018

**ATTESTED**



**APPELLANT**

**NAZMA ALI**

**THROUGH:**  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**



resultantly the appellant was transferred to GGHS Shabqadar Fort, District Charsadda vide order dated 1.3.2013. Copies of the application, domicile and order are attached as annexure ..... **E and F.**

4- That in light of the said order dated 1.3.2013 the appellant was relieved from GGHS Banian, Battagram and as such the appellant submitted her charge report at GGHS Shabqadar Fort, District Charsadda vide dated 4.3.2013. That Last Pay certificate was also issued to the appellant by the concerned quarter and as such the appellant started her duty at the concerned station. Copies of the relieving, charge report and LPC are attached as annexure ..... **G, H & I.**

5- That the respondent No.2 wrote a letter to the DEO (F), District Battagram for verification of the FA/F.SC certificate of the appellant and accordingly the same was verified by the concerned quarter. Copies of the verification letters are attached as annexure ..... **J.**

6- That accordingly the pay of the appellant was released by the respondent No.3. That during service the appellant was further transfer to GGMS Kulalan, Charsadda vide order dated 2.11.2013 and after that to GGMS Rajjar, Charsadda vide order dated 30.7.2015. Copies of the orders are attached as annexure ..... **K & L.**

7- That appellant while serving as Certified teacher at the concerned station salaries of the appellant were stopped/withheld by the respondents w.e.f. 1.8.2017 without any reason and clear justification. That feeling aggrieved the appellant preferred Departmental appeal before the competent authority but of no avail. Copy of the \Departmental appeal is attached as annexure ..... **M.**

8- That having no other remedy the appellant filed this instant appeal on the following grounds amongst the others.

**GROUND:**

A- That the inaction of the respondents by not releasing monthly salaries of the appellant w.e.f. 1.8.2017 till date is against the law, facts and norms of natural justice.

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

**ATTESTED**

M



Office of the District Education Officer Female  
District Charsadda

0 - 39

☎ 0919220086

✉ emischarsadda.deof@yahoo.com

No. \_\_\_\_\_ /

Dated \_\_\_\_\_ / \_\_\_\_\_ 2019

NOTIFICATION

1 Whereas Mst Nazma Ali CT (BPS-15) GGHS Rajjar r/o Rajjar Charsadda, was proceeded under Khyber Pakhtun khwa Govt. servants (Efficiency and Discipline) Rules 2011, on the-charges of Fake Appointment.)

2 And whereas the undersigned directed to the accused teachers through notice time and again and found her as a fake appointee.

And whereas the Worthy director E&SE Deptt Khyber Pakhtun khwa Peshawar initiated/conducted enquiry Vide No, 6754 F, No. 14 (F)/ Appeal Charsadda, dated 24-05-2019 against Mst Nazma Ali (CT) through Mst Naheed Anjum Deputy Director Female E&SE Khyber Pukhtoon khwa, Hence the Appointment order of Mst Nazma Ali declared fake by the enquiry-officer with the direction to the DEO (F) Charsadda may register an FIR in the Anti Corruption against the said fake teacher and all amount taken as salary may be recovered and refund to Government exchequer,

3 And Whereas, the show cause notices vide NO 16615 dated 30/5/2018, No, 16665 dated, 2/6/2018, No 16736 dated 6/6/2018 and personal hearing 20825 dated 13/11/2018 and E-mail verification by DEO(F) Battagram dated 23-5-2019 was served upon to Mst Nazma Ali Through DEO (F) Charsadda.

4 And Whereas, the authority having considering the charges, evidence on the record as per enquiry report, hence keeping in view the charges leveled against her have been proved hence she is not remained a civil servant under the rules on account of fake appointment letter.

Therefore, in exercise of the powers conferred by the Khyber pakhtun khwa Govt. servants, (Efficiency and Discipline) rules 2011, the competent authority is pleased to impose the Major penalty of Dismissal from service upon Mst Nazma Ali CT GGHS Rajjar Distt Charsadda with immediate effect

The DDEO (F) Charsadda already stopped her salary due to having fake appointment letter.

(Ulfat Begum)

District Education officer (Female)  
Charsadda

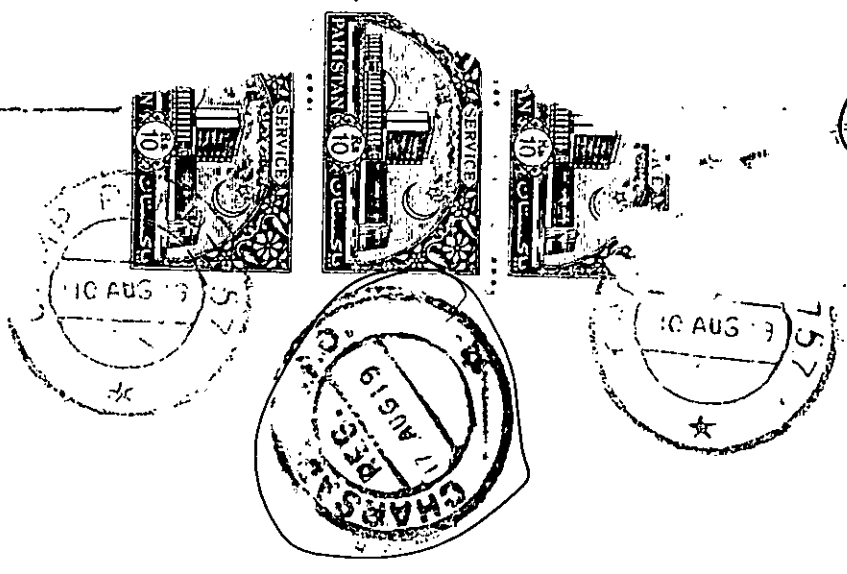
Endst No. (1508-15) dated (19/7) 2019

Copy forwarded for information and n/action to the:

1. PA to the Director E & S Education Khyber Pakhtun khwa Peshawar.
2. PA to the Deputy Commissioner Charsadda.
3. District Monitoring Officer E & SE Charsadda.
4. District Accounts Officers Charsadda.
5. The Concerned DDEO Female Charsadda with the request to recovered the salaries and deposit in Govt. Treasury through Challan under intimation to this office.
6. Head teacher GGHS rajjar Charsadda
7. Mst Nazma Ali Ex CT Charsadda.
8. ADO Estab Primary Local Office.
9. The Anti-Corruption Department Charsadda may be request to register FIR against the said fake teacher for Compliance the Enquiry recommendation.
10. Master File.

District Education officer (Female)

39/A



OPSS

قماة ناظمی دختر مدلی  
محلہ مارخیل رحیل  
کھیل، قلعہ چارسدہ -

892

سید علی  
District Education Officer  
(Female) Charsada

CAMP. P.O.P-757

Attested  
M. S.

TO,

P-46

**THE DIRECTOR (E&SE) DEPARTMENT,**  
Khyber Pakhtunkhwa, Peshawar.

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 19-07-2019 COMMUNICATED TO ME ON 17.08.2019 WHEREBY I HAVE BEEN DISMISSED FROM SERVICE**

Respected Sir,

With due respect it is stated that I was the employee of your good self Department and was serving as **CT (BPS-15) at Government Girls High School, Rajjar, District Charsadda.** That during service my salary was withheld by the District Education Officer, District Charsadda w.e.f 01.10.2017 without any cogent reason and clear justification. Feeling aggrieved from the impugned action of the concerned authority I have preferred Departmental appeal followed by service appeal No. 1504/2018 before the Khyber Pakhtunkhwa Service Tribunal, Peshawar which is still pending. That instead of releasing the monthly salary of the appellant w.e.f 01.10.2017 the concerned authority issued the impugned Dismissal order dated 19.07.2019 on the baseless allegations that the my appointment order against the post of C.T is fake. I am feeling aggrieved from the impugned order dated 19.07.2019 preferred this Departmental appeal before your good self. *Salary*

It is therefore, requested that on the acceptance of this departmental appeal the impugned order dated 19.07.2019 may very kindly be set aside and I may be re-instated into service with all back benefits. Any other remedy which your good-self deems fit that may also be awarded in my favor.

Dated: 23.8.2019

*Attested  
M-6*

Yours Obediently

*Naazma Ali*  
**MST NAZMA ALI (CT)**  
GGHS Rajjar, Charsadda

**VAKALATNAMA**

Before the 1st Service Tribunal, Peshawar

OF 2019

Nazma Ali

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We Nazma Ali

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

Dated. \_\_\_\_/\_\_\_\_/2019

Nazma Ali  
CLIENT

ACCEPTED  
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN  
&  
MIR ZAMAN SAFI  
ADVOCATES

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

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

Service Appeal No.1639/2019

Mst; Nazima Ali.....Petitioner.


Vs

Government of Khyber Pakhtunkhwa Peshawar.....

Respondents.

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S.NO	Description	Annexure	Page
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02	Annexures	A	4
03	Annexures	B	5-6
04	Annexures	C	7-11
05	Letter		12
06	Affidavit		13

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADEA



(1)

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

Service Appeal No.1639/2019

Mst; Nazima Ali

Vs

Govt. of Khyber PakhtuneKhwa

**Written Comments on behalf of Respondent.**

**Respectfully Sheweth:**

**PRELIMINARY OBJECTIONS:**

- A. The Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless hence not tenable in the eyes of law, and not maintainable, it shows no cause to be taken for adjudication, therefore the same Appeal is liable to be rejected/dismissed.
- C. That the Appeal is bad for misjoinder and no joinder of necessary parties.
- D. That no legal right of the appellant has been violated, therefore the appellant has no right to file the instant Appeal.
- E. That the Appeal is wholly incompetent, misconceived & not maintainable in its present form.
- F. The Appellant is completely Stopped/Precluded by her conduct to file this Appeal.
- G. Appellant has not come to this Hon'able Tribunal with clean hands. The Appeal also suffers from miss-statements and concealments of facts and as such the Appellant is not entitled to equitable relief.
- H. That the Hon'able Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I. That the Appeal is not maintainable under section (4) of Service Tribunal Act. The appellant not come with in the Ambit of civil Servant & the appeal of the appellant badly time barred.

**ON FACTS:**

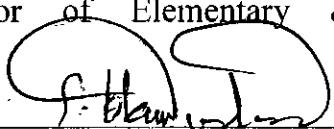
1. In correct according to the statement of DEO(F) Battagram through her Email signature put on subject letter is fake. According to the versions shedid not signed on such type of letter nor did Dispatch No. put on letter match with the Dispatched Register of undersigned. Copy of Email is attached as Annexure "A".
2. Incorrect as stated under Para '1' above of the Appellant have no any kind of service then how could be transferred. The appellant is just trying to mislead the Hon'able tribunal by self made stories.
3. Incorrect that the petitioner again mislead the Hon'able tribunal that all the records of the appellant is fake and bogus and after conducting enquiry an FIR was also lodge against the appellant and other fake teachers Copy of FIR is attached as Annexure "B".
4. Incorrect hence denied.
5. Incorrect as stated under Para "1" above according to the statement of DEO (F) Battagram that signature put on subject matter is fake, photo copy attached as Annexure "A".
6. Incorrect as stated above that all the records of the Appellant was fake and bogus. In order to probe into the matter an enquiry was conducted a in light of such inquiry report the competent authority issued dismissal order of the appellant and also recommend the anti-corruption department and other concerned departments may register an FIR against the appellant and all amount was receive as salary may be recovered and refund to the Govt. exchanger. Photo copy of inquiry is attached as Annexure "C".
7. Incorrect as stated under Para '6' above that the appointment order of the appellant was found fake in light of the enquiry report and also issued dismissal notification of the appellant. Furthermore in order to do justice this department also give a chance of personal hearing to the appellant photo copy of letter is attached as Annexure "D".
8. That this department shall seeks permission of the Hon'able tribunal to draw additional grounds at the time of hearing.

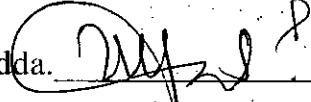
**ON GROUNDS:**

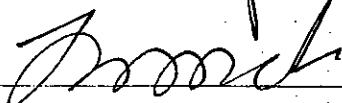
- A. Incorrect that the respondent department have acted according to law/policy.
- B. Incorrect as stated under Para '7' (on Facts) above.
- C. Incorrect that the respondent department have issued the dismissal order after conducting proper inquiry and after the recommendations of the competent authority.
- D. Incorrect hence denied.
- E. Incorrect that the department issued letter for personal hearing in order to justify the matter. Copy attached as Annexure "D".
- F. Incorrect hence denied.
- G. Incorrect as stated under Para "F"(On Grounds) above.

**PRAY:**

In aformentioned circumstances it is humbly prayed that the Appeal of the Appellant may be dismissed with cost.

**Respondent No.1:.** Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.: 

**Respondent No. 02:.** District Education Officer (Female) Charsadda. 

**Respondent No. 03:.** District Account Officer Charsadda. 

DISTRICT ACCOUNTS OFFICER  
CHARSADDA

ANNEXURE B

(31)

(4)

(13)

Rehana Yasmin <deorchanabasi@gmail.com>  
To: DEOFEMALE CHARSADDA  
May 23 at 7:47 AM  
R/DEO F  
Charsadda

Reference your letter received through e mail for verification  
It is stated that signature put on subject letter is fake .I did not signed on such type of letter nor dispatch  
no.put on letter mach with despatched register of u/o undersigned copy of dispatched register  
attached. Therefore it is regretted to say letter is totaly bogus and fake signature with fake d/no put on  
that.

REHANA YASMIN  
DEO F BATTAGRAM

Education Office  
Female Charsadda



(19) قلمندندہ بیانات، حوصلہ مندہ و پرفیکشن دیوت ہاتے و سبکی ۱۰ نوٹوں سے تمام ملزموں  
 اضاہ میں پمیل ٹیچر DA 64MS9 گریڈ ۱۹ جلدیاں ڈیوی جاریہہ (۱۸) نگیٹ سیاہی میں ٹیچر AT  
 پمیل 64MS15 دادہ کے (۱۹) حدت فی پمیل ٹیچر PET گریڈ 64MS9 ترمندی (۲۰) ٹائیہ ولی فی پمیل  
 پمیل 64MS15 گریڈ 16 دہنت پورن (۲۱) سٹو بیگم فی پمیل ٹیچر PST گریڈ 7 پمیل پمیل نام کوئی  
 پمیل 64MS15 گریڈ 19 علم جاریہہ (۲۲) الٹ بیگم سابقہ DEO فی پمیل گریڈ 19 اصلو  
 (۲۳) قادیار ڈاؤن گریڈ 18 اصلو پمیل نام حال ڈسپن (۲۴) حادہ پورن سب اکا و شہ گریڈ 15  
 (۲۵) قادیار ڈاؤن گریڈ 16 اصلو پمیل نام حال د فتر DA اصلو عالیہہ (۲۶)  
 (۲۷) قادیار ڈاؤن گریڈ 15 اصلو عالیہہ د فتر DA (۲۸) طاری قادیار AT گریڈ 16 اصلو پمیل نام (۲۹)  
 (۳۰) قادیار ڈاؤن گریڈ 15 اصلو پمیل نام حال ڈسپن (۳۱) قادیار ڈاؤن گریڈ 17 اصلو عالیہہ د فتر DE  
 (۳۲) قادیار ڈاؤن گریڈ 17 اصلو پمیل نام حال ڈسپن (۳۳) قادیار ڈاؤن گریڈ 17 اصلو عالیہہ د فتر DE  
 (۳۴) قادیار ڈاؤن گریڈ 17 اصلو پمیل نام حال ڈسپن (۳۵) قادیار ڈاؤن گریڈ 17 اصلو عالیہہ د فتر DE  
 (۳۶) قادیار ڈاؤن گریڈ 17 اصلو پمیل نام حال ڈسپن (۳۷) قادیار ڈاؤن گریڈ 17 اصلو عالیہہ د فتر DE  
 (۳۸) قادیار ڈاؤن گریڈ 17 اصلو پمیل نام حال ڈسپن (۳۹) قادیار ڈاؤن گریڈ 17 اصلو عالیہہ د فتر DE  
 (۴۰) قادیار ڈاؤن گریڈ 17 اصلو پمیل نام حال ڈسپن (۴۱) قادیار ڈاؤن گریڈ 17 اصلو عالیہہ د فتر DE

COACECHD  
9-10-017

اطلاع کے لیے اطلاع دہندہ کا دستخط ہوگا یا اس کی مہر یا نشان لگایا جائے گا۔ اور اس پر تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔ حروف الف یا ب سرخ روشنائی سے یا تھامس نام سے  
 ایک لٹرم یا شہر علی الترتیب اسلئے باشندگان علاقہ غیر یا وسط ایشیا یا افغانستان جہاں موزوں ہوں لکھنا چاہئے۔

*(Signature)*  
 Office  
 Femandi, Wazirabad

INQUIRY REPORT

(7) 204

PERTAINING TO THE TRANSFER OF Mst NAZMA ALI CT  
FROM DISTRICT BATTAGRAM TO DISTRICT CHARSADE

AUTHORITY

DIRECTOR

ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

INQUIRY OFFICER

NAHEED ANJUM

DEPUTY DIRECTOR E&SE KHYBER PAKHTUNKHWA

# INQUIRY REPORT

8

## TERMS OF REFERENCE

The Director E&SE Khyber Pakhtunkhwa Peshawar was pleased to nominate the undersigned as inquiry officer under the Notification Endst No.9749-51/F.NO14/(F) Appeal Charsadda Pesh the 26/10/2018(Annexure-I).

## BACKGROUND:

The DEO (F) Charsadda requested the worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa vide Letter No.19585 Dated 5/10/2018 to order an inquiry regarding the transfer of Mst. Nazma Ali CT from Battagram to Charsadda (Annexure-II).

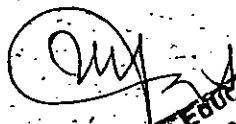
## PROCEDURE:

After intimating vide Letter No. 2048 Dated:09/11/18(Annexure-III), the undersigned visited the Office of the District Education Female, Charsadda on 14/11/2018. She perused and collected all the relevant available record. During the visit of DEO(F) office, Mst; Nazma was also present (Annexure-IV). She submitted her written statement on the spot.

Letter No. 195 Dated 1/11/18 and Letter No. 2048 Dated 9/11/18(Annexure-V &VI) were sent to the District Education Officer (F) Battagram requesting him to direct the dealing hands to attend the office of the undersigned along with all relevant record. He attended the office however, he provided incomplete record. The DEO(F) Battagram was again requested vide Letter No. 8609 dated 31/1/2019(Annexure-VII) and was telephonically contacted as well but the requisite information was not provided.

The Deputy Director (F)Establishment Directorate of E&SE was requested vide Letter No. 193 Dated 01/11/2018 (Annexure-VIII) to verify the transfer order of Mst. Nazma from Battagram to Charsadda. In response, vide Letter No 603/F.No.14/Appeal Charsadda Dated Peshawar the 21/12/2018(Annexure-IX) it was replied that the file had been misplaced during shifting of office and the dispatch/issue register was in the custody of NAB and they did not possess any record pertaining to the transfer in question.

The existing dealing assistant of Deputy Director (F) Establishment Directorate of E&SE Mr. Muhammad Zahir was asked vide Letter No. 380 Dated 1/1/2019(Annexure-X) to record statement regarding misplacement of the required file. In reply, he said that the dealing assistant in 2013, was Mr. Munir and that he would be in a better position to response (Annexure-XI). Therefore, Mr. Munir Khan, the then dealing assistant was asked vide No 794.Dated 3/1/19(Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education. (Annexure-XIII). So, in those conditions the

  
District Education Officer  
Female Charsadda



Inquiry officer was unable to retrieve any official record or documents despite issuing official letters.

Letter to District Education Officer Male Swat was sent vide No. 5265 Dated 21/11/2018(Annexure-XIV) to direct Mr. Khadim Shah the then Suptt Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as he had personally visited the DEO Office Battagram to verify the documents of Mst. Nazma. Statement of Mr. Khadim Shah was recorded (Annexure-XV).

Undersigned studied the case thoroughly.

Undersigned reported findings accordingly.

DETAILS:

SUMMARY OF THE STATEMENT OF MST NAZMA

Mst Nazma Ali gave detailed verbal discussion in the office of District Education Officer, Mst Nazma Ali gave statement in the presence of DEO (F). She stated that she was appointed in GGHS District Battagram vide Endst No5509-14/FB/AE-II/Appointment/2010 31/1/2011(Annexure-XVI) as a CT without any written test. As CT post was not lying in GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office order No 1385-89 Dated 31/1/2011 (Annexure-XVII). Her husband was posted in office Battagram as a class IV. He belonged to District Charsadda. After four months he was granted for medical leave but she could not provide any record of her medical leave to the undersigned. According to her statement she was transferred to Charsadda vide endorsement No. A-167CT2013 Dated Peshawar the 1/3/2013. She provided charge report in GGMS relieving certificate from GGHS Banian, Application for transfer, transfer order, attendance register of GGMS Shamlai, pay slip along with her written statement (Annexure a,b,c,d,e,f,g). Surprisingly pay slip which she provided name of the school is GHS

As per

SUMMARY OF THE STATEMENT OF MR. MUHAMMAD JAMIL SUPERINTENDENT BATTAGRAM:

Mr. Muhammad Jamil superintendent office of the DEO (F) Battagram visited the office of the undersigned twice on 28/11/2018 and 6/12/2018. He provided incomplete record and only appointment order of 2011(Annexure-XIX), Photocopy of statements of employees of GGHS Banian and GGMS Shamlae (upgraded to high school in June 2011) of DEO (F) Battagram attendance register of GGMS Shamlae (Annexure-XX, a, b, c, d, e, f, g). He gave the statement that the name of MST Nazma could neither be found in the appointment order nor in the attendance register (Annexure-XXI). A Written statement given by employee of GGMS Shamlae saying that, as per the attendance register no teacher on the name of MST Nazma was found". DEO female in his letter also mentioned that the name of Mst. Nazma was not found in any school of Battagram. He provided minutes of DSC meeting in which

*Muhammad Jamil*  
 Distt: Education Officer  
 (Female) Charsadda

10/2/11

of total 12 vacant posts, 9 posts were recommended/approved to be filled from batch wise list (a) and 3 from open merit, at the ratio of 75% and 25% as per policy that time in vogue. However, 10 candidates were appointed in batch wise quota and 3 from open merit, total 13 appointments were made instead of 12. In the appointment order provided by Mst. Nazma Ali 11 candidates were enlisted. Alarming, the appointment file was incomplete and a transfer file of a period was missing in the office of the DEO Battagram. (Annexure XXII a, b)

iii. SUMMARY OF THE STATEMENT OF MR. KHADIM SHAH EX-SUPERINTENDENT CHARSADDA:

Mr. Khadim Shah recorded his statement and clarified that he visited office of the DEO (F) Battagram to verify the service documents of Mst. Nazma by hand on 14/4/2013 and checked all the record their but due to absence of DEO (F) Battagram on that day he left the record for signatures/verification. Later on, the verification was sent to DEO (F) Charsadda vide letter no 74/verification Dated 17/4/2013 through post/ Mail. (Annexure-XXIII). He also provided endorsement certificate signed by the then DDEO Battagram, Mr. Fida Muhammad (Annexure-XXIV). It is astonishing that all the record was also signed by the same DDEO but not provided by hand and sent that through post.

ORIGIN OF THE ISSUE:

During visit of DEO (F) Office Charsadda, the DEO female told that she requested for the enquiry after the anticorruption Charsadda sent a letter to her office on 25/9/17, regarding detail of the teachers who were transferred from other districts and FATA from 2006 onward. (Annexure-XXV). Hence, a letter for the verification of service documents was again sent vide letter no 7972/Dated 21/10/2017 to DEO (F) Battagram. (Annexure-XXVI). Reminder for verification was sent vide endorsement no 18919 dated 3/2/2018. (Annexure-XXVII). The documents were received duly verified, vide letter no 5390 Dated Battagram the 9/3/2018 bearing signatures like the then DEO (F) Battagram MST Rehana Yasmin. (Annexure-XXVIII). The DEO Charsadda was worried about fake appointments so, she sent the documents to the DEO (F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) Battagram in which she told that not only the verification letter was fake but also the dispatch number on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted that District accounts office Battagram verified her LPC vide letter no 174 DAO/BM Dated 04/2013 (Annexure-XXX a, b).

Findings

From the available record of both the DEO (F) Offices, statement of all the people/officials concerned, it is clear that;

- The appointment order is fake and bogus.

*M. F. Education Officer*  
 (Female) Charsadda

- Teacher attendance register of GGMS Shamlac revealed that she had never been a part of that school.
- The salary record was not traceable from Battagram.
- Transfer order issued by the directorate was also not confirmed as the file was missing in the directorate.
- The academic documents provided were also not verified by the institutions concerned.
- Verification of all document also proved to be fake.
- The ministerial staff in the female DEO office are responsible for the loss or non-production of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

### RECOMMENDATIONS

1. The fake appointment order produced by Mst. Nazma may be treated as of no effect and be treated as null and void ab initio. The DEO (F) Charsadda may register a FIR in the Anti-Corruption against the said teacher.
2. All amount taken as salary may be recovered and refund to government exchequer.
3. An in-depth inquiry may be initiated against the Ministerial staff of DEO office Battagram and establishment branch in Directorate for their casual handling of the office record and squandering valuable official record pertaining to the appointment /transfer and they should then be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
4. DEO female office Battagram may be directed to bring her house in order, recover the official record of her office and secure them from loss.

The report is submitted for perusal and further necessary action under the rules, please.

*[Signature]*  
 Mr. Edur Amin Otho  
 Female DEO Charsadda

*[Signature]*  
 12/24/19  
 Miss Nahced Anjum

Deputy Director  
 E&SE Khyber Pakhtunkhwa

DISTRICT EDUCATION OFFICE FEMALE CHARSAKDA

Contact No.0919220486, Email address, emischarsakda.deof@yahoo.com

No. 20825 / Dated 13 / 11 2018

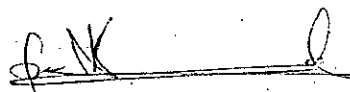
To

Mst: Nazma Ali  
EX-CT  
GGHS Rajjar

Subject: PERSONAL HEARING

Memo:

YOU are hereby directed to attend the office of the undersigned for personal hearing on 14/11/2018 at 9: AM positively, as the Dy: Directress will visit this office for the enquiry of your transfer case.

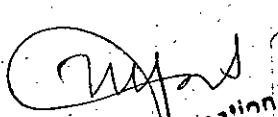
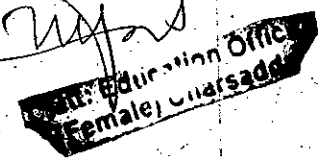
  
DISTRICT EDUCATION OFFICER  
FEMALE CHARSAKDA

Endst: No. \_\_\_\_\_ / Dated \_\_\_\_\_ / 2018

Copy for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Principal GGHS Rajjar
3. Office File.

DISTRICT EDUCATION OFFICER  
FEMALE CHARSAKDA

(13)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR**

Service Appeal No.1639/2019

Mst; Nazima Ali

Vs

Govt. of Khyber Pakhtunkhwa

Written comments on behalf of Respondent.

AFFIDAVIT

I Mst; Shagufta Rani ADEO Litigation of the DEO (F) Charsadda do hereby as per information conveyed to me by DEO (F) Office solemnly affirm and declared that the contents of Para wise reply are true and correct to the best of my knowledge and nothing has been intentionally concealed from this Hon'ble Tribunal.

Deponent

Shagufta Rani ADEO Litigation  
O/O DEO (F) Charsadda  
CNIC: 17101-6293694-8

2



**KHYBER PAKHTUNKWA**  
**SERVICE TRIBUNAL, PESHAWAR**

No. 2554 /ST

Dated: 21/12 /2021

All communications should be  
addressed to the Registrar KPK Service  
Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

To

The District Education Officer Female,  
Government of Khyber Pakhtunkhwa,  
Charsada.

Subject: JUDGMENT IN APPEAL NO. 1639/2019 MST. NAZMA ALI.

I am directed to forward herewith a certified copy of Judgement dated  
11.11.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR

KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADEA

Contact No. 091-9220486 Email Address: emscharsadda.deof@yahoo.com

NO. 16735 /Dated/ 6/6/2018.

39

To

Mst: Nazma Ali D/O Muhammad Ali  
CT GGHS Rajjar.

SUBJECT:- SHOWCAUSE/EXPLANATION  
Memo,

You have directed to be present in this office for personal Hearing vide this office No. 16615 dated 30-05-2018, and 16665 dated 02-06-2018 but you has not come for personal hearing and presented medical Certificate through your husband Mr Jawad Khan for 15 days rest w-e-f 04-06-2018.

You are hereby directed to appear before the undersigned after completion of rest days in case of further delay ex-party action would be initiated against you as per the rules.

Endstt No. 16726-40 c/c  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADEA

- Copy for Information to the:
1. PA to Director, E&SE Khyber Pakhtunkhwa Peshawar.
  2. Principal GGHS Rajjar.
  3. ADEO (F) Local Office.
  4. Official Concerned
  5. Office File

DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADEA

5. 222 For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Rs. Ps. 40

Weight } Kilo  
(in words) } Grams

Name and address of sender