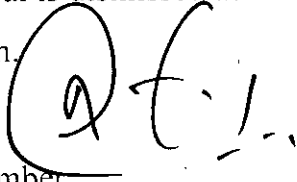
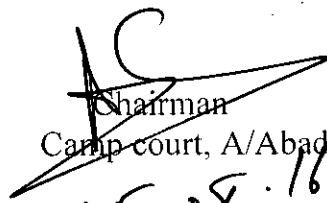


15.08.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Learned counsel for the appellant pressed into service copy of notification dated 23.11.2015 vide which the appellant has been reinstated in service. Requested for withdrawal of the appeal .

In the light of the afore-stated developments. the appeal is dismissed as withdrawn. File be consigned to the record room.


Member
ANNOUNCED
15.08.2016


Chairman
Camp court, A/Abad

15.08.16

21.1.2016

Syed Rizwan Kazmi on behalf of the appellant alongwith agent of counsel for the appellant and Mr. Muhammad Fayaz, ADO alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 15.8.2016 at Camp Court A/Abad.

Chairman
Camp Court A/Abad

15.08.2016

~~Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Learned counsel for the appellant pressed into service copy of notification dated 23.1.2015 vide which the appellant has been reinstated in service. Requested for withdrawal of the appeal~~

~~In the light of the afore-stated developments, the appeal is dismissed as withdrawn. File be consigned to the record room.~~

~~Member
ANNOUNCED
15.08.2016~~

~~Chairman
Camp court A/Abad~~

3

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 10.3.2015 which was not responded and hence the instant service appeal on 8.7.2015.

Appellant Deposited
Security & Process Fee



That the appellant was given no opportunity of hearing nor the inquiry was conducted in the prescribed manners and major penalty in the shape of dismissal from service was passed which penalty is against facts and law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed.



Chairman
Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Requested for adjournment. To come up for written reply/comments on 21.01.2016 before S.B at Camp Court A/Abad.





Chairman
Camp Court A/Abad.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 774/2015

| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1 | 08.07.2015 | <p>The appeal of Mst. Bushra Gul presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> REGISTRAR</p> |
| 2 | 10-2-15 | <p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u></p> <p> CHAIRMAN</p> |

63

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

NOTIFICATION.

WHEREAS, Mst Bushra Gul, AT at Government Girls Middle School Kothri, District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1532-41 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 4411-18 dated 22-09-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Her name is included in the merit list at S.No. 07. On awarding the marks of M.A wrongly her score was 55.15. But her M.A result has been declared on 16/01/2012 whereas the date of submission of application was 06/06/2011. Hence after deducting the marks of M.A her score became 50.05 and her position in the merit list reaches to 17 instead of 07, wherein she deserves to be appointed on merit basis against one of the prevailing 18 vacancies of A.T. She has been appointed as A.T vide General order No. 710-52/Estt(F)/Appt.AT(F)/2012 dated Mansehra the 14/06/2012.
2. Appeal may be accepted with the remarks that she fulfilled/possessed the minimum prescribed qualification for the post of A.T at the time of appointment..

NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1532-41, dated 03/03/2015 and reinstate Ms. Bushra Gul, AT at Government Girls Middle School Kothri District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

2530-35
Endst: No. _____/F.No. _____/Appeals Female MSR Dated Peshawar the 23/11/15

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

1. District Education Officer (Female) Mansehra
2. District Accounts Officer Mansehra
3. Head Mistress Concerned.
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

23/11/15
Deputy Director (Female)
Directorate E&SE, KP
Peshawar

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 786/2015

Bushra Gul D/O Masood Khan (AT GGHS Kothri) R/O ,Mohallah
lehari Nomani Baffa town, Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

INEX

| S.No | Prescription of Document | Annexure | page |
|------|---|----------|-------|
| 1 | | | 1-10 |
| 2 | Copy of Advertisement | "A" | 11 |
| 3 | Copies of Documents/testimonial are annexed | "B" | 12-28 |
| 4 | Copy of appointment order and corrigendum | "C" | 29-30 |
| 5 | Copy of Show cause notice and one page of inquiry of the then EDO | "D" | 31-34 |
| 6 | Copy of impugned dismissal order of appellant | "E" | 33 |
| 7 | Copy of departmental appeal /representation | "F" | 34 |
| 8 | Copy of merit list | "G" | |
| 9 | Wakalatnama | | |

Dated: 2/5/2015


Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

(1)

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

Appeal no. 774/15

A.W.F. Province
Service Tribunal
Diary No. 802
Dated 8-7-2015

Bushra Gul D/O Masood Khan (AT GGHS Kothri) R/O , Mohallah
lehari Nomani Baffa town, Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

SERVICE APPEAL.

**Service Appeal u/s 4 of KPK Service
Tribunal, 1974**

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is as under:-

1. That, respondent No 3 announced the posts of AT in Dailly "The Aaj" dated 20/5/2011 for appointment of Qaria. The Appellant fulfills the entire criteria which sine qou non for appointment for the post of AT. Copy of Advertisement is annexed as Annexure "A"

877/15

(2)

2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, Hifz, tajweed, teaching of tajweed, Shahadat ul Almia from registered Institution/ Maddaris. Copies of Documents/testimonial are annexed as Annexure "B"
3. That, following this, the appellant was appointed as AT in respondents' Department on the basis of merits and was posted in GGHS Kothri vide appointment order endrst No 710-52/ ESTT AT (F) APPTT; (f) 2012 Dated 14/6/2012. Copy of appointment order is annexed as Annexure "C".
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 14.6.2012 onwards.
5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1532-41/AE-J/ESTB on 3.3.2015.
6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi DEO, Shamim Akhtar was found attached with the show cause notice, wherein it was mentioned against the name of appellant that "No

(3)

relevant, sannād for appointment and the appointment is not valid and is against the recruitment policy". Copy of Show cause notice and one page of inquiry of the then EDO is annexed as Annexure "D". AS the inquiry committee did recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of AT and appeared in ETTA Test and thereafter was appointed on merit Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their sannads of Hifz and tajweed from registered institutions are to be appointed "as per service structure in prescribe rules the sannad of Qirat from a recognized Institution meant a certificate obtained from Maddaris/Intuition Registered by the Govt. of KPK.
8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order.

(4)

endst. No 1532-41/AE-J/ESTB dated 3.3.2015. Copy of impugned dismissal order of appellant is attached as annexure "E".

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 10.3.2015. Copy of departmental appeal /representation is attached as annexure "F" but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

GROUND

- a. That, the appellant fulfilled the criteria of appointment as AT being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee. Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.
- b. That, as per educational record annexed with the appeal, the appellant has been appointed as AT according to the laid down procedure and criteria

(5)

mentioned in the advertisement published by respondent 3. It is further submitted that no institution/madaris of female is not recognized in KPK since 1969 onwards. Therefore Qarias were appointed in Education Department prior to 2012 on the basis of sannads similar to that of appellant. Therefore if hundreds of female AT are serving in Educational Department on the basis of similar sannads then the appellant is also entitled to serve the department as per law. Hence impugned dismissal order is liable to be set aside.

- c. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as AT . But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- d. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore, respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in

(6)

future as well. Hence impugned dismissal order is liable to be set aside.

- e. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.
- f. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- g. That, right from the appointment of the appellant as AT in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- h. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of removal of Umar Kundi from service, the appellant cannot be dismissed for the acts committed by the ex-EDO.

(7)


- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order endrst. No 1532-41/AE-J/ESTB dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc. Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 7/3/2015


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

(8)

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Bushra Gul D/O Masood Khan (AT GGHS Kothri) R/O ,Mohallah
lehari Nomani Baffa town, Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

APPLICATION FOR SUSPENSION
OF IMPUGNED ORDER NO 1532-
41/AE-J/ESTB AND GRANT OF
STATUS QUO TILL FINAL DISPOSAL
OF THE MAIN APPEAL .

Respectfully Sheweth,

1. That the instant service appeal is being filed today and this application may be treated as part and partial of the service appeal.
2. That, competent authority i.e District Education Officer (Male) Masehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued
3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the

(9)

applicant has not been contested by any one as there was no contesting rival candidate.


5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

It is, therefore, very humbly prayed that on acceptance of the instant application, impugned termination order dated 03.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: 2/5/2015


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

10)

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Bushra Gul D/O Masood Khan (AT GGHS Kothri) R/O ,Mohallah
lehari Nomani Baffa town, Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

AFFIDAVIT

I, Bushra Gul D/O Masood Khan (AT GGHS Kothri) R/O ,Mohallah
lehari Nomani Baffa town, Tehsil & District Mansehra do hereby
solemnly affirm and declare that the contents of foregoing
service appeal are true and correct to the best of my knowledge
and belief and nothing has been concealed from this Honourable
Court.

Dated: _____/2015


Deponent

29070014218

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Annex B

005456



شبكة المدارس العربية
وفاة المدارس الإسلامية

P-12



الحمد لله رب العالمين . والصلاة والسلام على خاتم الانبياء والمرسلين ، وعلى آله وصحبه أجمعين . أما بعد ، فإن رئاسة
 وفاق المدارس العربية بباكستان ، تشهد بأن الطالبة بشري گل بنت مسعود خاند من مانسهره
 المولودة في عام 1988 قد أتمت الدراسة العالية في دارالعلوم اسلاميه ونجحت في الامتحان النهائي المنعقد
 تحت إشراف وفاق المدارس العربية بباكستان في شعبان 1429 هـ بتقدير جيد جداً وبستاناً على ذلك استحضت الشهادة العالية
 ورئيس الوفاق إذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل الصالحات العاملات .



مدير المدارس / د. سید محمد

مدير المدارس / د. سید محمد

مدير المدارس / د. سید محمد

سید محمد

سید محمد

سید محمد

رقم التسجيل 1427-05-015989

رقم الجلس 8743

الدرجات 464 / 1-

محل الإصدار: الناشر: د. سید محمد

التاريخ: 01-09-2008

Tanoli
Advocate
Masthead

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



وفاق المدارس العربية
باكستان

كشف الدرجات

امتحان الشهادة العالية في العلوم الإسلامية والعربية (ج 1)

عام ٢٩ ١٤ (السنوات)

رقم التسجيل 1427-05-015989 2008 رقم الجلوس 8743

اسم الطالب بشري گل - اسم الوالد مسعود خان

المديريّة مانسهره - تاريخ الميلاد 1988

اسم الجامعة/ المدرسة دار العلوم اسلاميه

الحاق نمبر 01527 صفه محلّه مسعود آباد مانسهره

| المادة | الدرجة | المادة | الدرجة |
|---------------|--------|--------------|--------|
| التفسير | 72 | الفرائض | 74 |
| الحديث واصوله | 77 | المبلاغة | 80 |
| الفقه | 85 | الادب العربي | 76 |

الدرجة الضعيفى ٤- الدرجة الكبرى ١٠٠- مجموع الدرجات ٦٠٠- الدرجات المحصلة 464

تشهد إدارة وفاق المدارس العربية أن الطالبة المذكورة أعلاه قد نجحت في امتحان الشهادة العالية

بتقدير جيد جداً - وصل الله على سيدنا محمد وآله وصحبه وسلم

توقيع مراقب الامتحان



المكتب الرئيسي ملتان

التاريخ 01-09-2008

Attested

Muhammad...
District Office Abbottabad

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



وفاق المدارس العربية
باكستان

كشف الدرجات

امتحان الشهادة العالمية في العلوم الإسلامية والعربية (الطبعة العربية - اعلامية)

عام ١٤٣٠ هـ (السنوات)

2009

رقم الجلوس 1864

رقم التسجيل 1427-05-015989

اسم الطالب: بشري گل

اسم الوالد: مسعود خان

المديونية مانسهره تاريخ الميلاد 1988 هـ

اسم الجامعة: دارالعلوم اسلاميه

بفہ محلہ مسعود آباد مانسهره

الحاق نمبر 01527

| الدرجات | الكتب الدراسية | الدرجات | الكتب الدراسية |
|---------|------------------------------|---------|------------------------------|
| 51 | الصحيح البخاري ^{١٤} | 57 | الصحيح البخاري ^{١٤} |
| 46 | الجامع للترمذي ^{١٤} | 88 | الصحيح لمسلم |
| 77 | السنن لأبي داود | 70 | الجامع للترمذي ^{١٤} |

الدرجة الصغرى ٤٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ٦٠٠ - الدرجات المحصلة 389

تشهد إدارة وفاق المدارس العربية أن الطالب المذكور أعلاه قد نجح في امتحان الشهادة العالمية

بتقدير جيد جدا

وقد نال على سيدنا محمد وآله وصحبه وسلم

توقيع مراقب الامتحان



المكتب الرئيسي ملتان

التاريخ 21-08-2009 هـ

Attested
Mubashir Khan Janoli
Advocate
Distt: Couhis Abouatabad

P-16

30080021144

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

013647



الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد. فإن رئاسة
 وفاق المدارس العربية بباكستان، تشهد بان الطالبة بشرى گل بنت مسعود خان من مانصهره
 المولودة في عام 1988. وقد أتمت الدراسة النهائية في دارالعلوم اسلاميه ونجحت في الامتحان النهائي المنعقد
 تحت إشراف وفاق المدارس العربية بباكستان في شعبان 1430 هـ بتقدير جيد جدا وبنتا على ذلك استحققت الشهادة،
 ورئيس الوفاق إذ يمنحها هذه الشهادة، يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل العالمات العاملات.

مخرج الوثيقة

مدير مدرسة / الفوق

مدير مدرسة

مدير مدرسة



[Signature]

[Signature]

[Signature]

رقم التسجيل... 1427-05-015989

رقم الجلوس... 1864

الذخجات / 1- 389

محل الإصدار: دارالعلوم اسلاميه

التاريخ 21-08-2009

[Handwritten signature]

[Handwritten signature]

Director General
Ministry of Education
Government of Punjab
Lahore

P-15

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وفاق المدارس العربية
باكستان

كشف الدرجات

امتحان شهادة الثانوية الخاصة في العلوم الإسلامية والعربية (ايك)

عام ٢٠٠٧ - ١٤٢٨ هـ (للسنوات)
رقم التسجيل 1427-05-015989 رقم الجلوس 9687

اسم الطالب بشري گل اسم الوالد مسعود خان
المديرة مانسهره تاريخ الميلاد ١٣٠٨ هـ 1988 م
اسم الجامعة/المدرسة دارالعلوم اسلاميه الحاق نمبر 01527
بف محله مسعود آباد مانسهره

| المادة | الدرجة | المادة | الدرجة |
|---------|--------|----------------------|--------|
| التفسير | 74 | اصول الفقه | 84 |
| الحديث | 78 | التحوي | 69 |
| الفقه | 43 | الأدب العربي والشايع | 73 |

الدرجة الشغرى ٤٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ٦٠٠ - الدرجات المصنفة 421

شهادة إدارة وفاق المدارس العربية أن الطالبة المذكورة أعلاه قد نجحت في امتحان الشهادة الثانوية الخاصة
بتقدير جيد جدا
وصل الله على سيدنا محمد وآله وصحبه وسلم

المكتب الرئيسي وفاق المدارس العربية
توقيع مراقب الامتحان

الشارح 13-09-2007

Attested
Muh...
Dis...
Anoli
Date
D...

28960003918

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



اللَّهُمَّ كُنَّا

الْمَثَابَةِ الْخَاصَّةِ



الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين. وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة
 وفاق المدارس العربية بباكستان، تشهد بأن الطالبة بشرى گل بنت مسعود خان من مانسهره
 المولودة في عام 1988 هـ قد أتمت دراسة الثانوية الخاصة في دارالعلوم اسلاميه ونجحت في الامتحان النهائي المنعقد
 تحت إشراف وفاق المدارس العربية بباكستان في حجب 1428 هـ بتقدير جيد جداً. وبذلك استحققت الشهادة
 ورئيس الوفاق إذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل العالقات العاملات.

رقم التسجيل 1427-05-015989
 رقم الجلوس 9687
 الدرجات 421 / 100
 محل الإصدار: دارالعلوم العربية بباكستان
 التاريخ: 13-09-2007 ع.
 توقيع: سید محمد سعید
 توقيع: محمد سعید
 توقيع: محمد سعید
 توقيع: محمد سعید



P-17

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



وفاق المدارس لعربية
باكستان

كشف الدرجات

امتحان شهادة الثانوية العامة في العلوم الإسلامية والعربية (مبتكر)

عام ٢٠٠٦ هـ (للسنات)

13575

رقم الجلوس

رقم التسجيل 1427-05-015989

اسم الطالب بشري گل

اسم الوالد

مسعود خان

المديونية مانسهره

تاريخ الميلاد

١٣٠٨ هـ
1988

اسم الجامعة المدرسة دارالعلوم اسلاميه

بف محله مسعود آباد مانسهره

الحاق نمبر 01527

| الدرجة | المادة | الدرجة | المادة |
|--------|-----------------------|--------|---------|
| 25 | الصرف | 57 | التفسير |
| 20 | التحوي | 84 | الحديث |
| 58 | التاريخ والأدب العربي | 49 | الفقه |

الدرجة الصغرى ٤- الدرجة الكبرى ١٠٠- مجموع الدرجات ٦٠٠- الدرجات المحصلة 293

تشهد إدارة وفاق المدارس لعربية أن الطالبة المذكورة أعلاه قد نجحت في امتحان الشهادة الثانوية العامة

بتقدير مقبول

ووصل الله على سيدنا محمد وآله وصحبه وسلم

توقيع مراقب الامتحان



المكتب الرئيسي ملتان

التاريخ 22-09-2006

الشارح

Muhammad

Advocate

Dist: Gujrat Abbottabad



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ
شهادة
الثانوية العامة



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين. وعلى آله وصحبه أجمعين. أما بعد. فإن رئاسة
وفاق المدارس العربية بباكستان. تشهد بان الطالبة نسي گل بنت مسعود خان من مانسهره
المولودة في عام 1989م. قد أتمت دراسة الثانوية العامة في دار العلوم اسلاميه ^{بمنحة مستغرة} مانسهره. ونجحت في الامتحان النهائي المنعقد
تحت إشراف وفاق المدارس العربية بباكستان في 2006م بتقدير مقبول. وبسبب ذلك استحققت الشهادة
ورئيس الوفاق اذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل العالقات العاملات.



رئيس وفاق المدارس العربية بباكستان

رئيس وفاق المدارس العربية بباكستان

رئيس وفاق المدارس العربية بباكستان

رقم التسجيل 1427-05-015989
رقم الجلوس 13575
الذخبات 293 / 1-

محل الإصدار: وفاق المدارس العربية بباكستان
التاريخ: 22-09-2006 ع

01527

P-19

ADA 146376

Roll No. 56646

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2004

This is to certify that BUSHRA GUL
Son/Daughter of MASOOD KHAN
A candidate from GOVT. GIRLS HIGHER SECONDARY SCHOOL BAFFA MANSEHRA
has passed the Secondary School Certificate Examination of the Board of
Intermediate and Secondary Education, Abbottabad held in March 2004 as a
Regular/Private Candidate. He/She obtained 571 marks out of 850 and has been
placed in Grade B Representing VERY GOOD.

The candidate passed in the following subjects.

- | | | | |
|------------|------------|--------------|----------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS | 6. PHYSICS | 7. CHEMISTRY | 8. BIOLOGY |

Date of Birth according to admission form is SECOND AUGUST

One Thousand Nine Hundred and EIGHTY-EIGHT (02-08-1988)

Asstt/Secretary

This certificate is issued without alteration or erasure.

Secretary

ADA No. 060141

Roll No. 43076

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



P-20

Abbottabad N.W.F.P. - Pakistan
HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2006

Humanities Group

This is to certify that BUSHRA GUL

Daughter of MASOOD KHAN

A candidate from GGHSS BAFFA MANSEHRA

has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 2006 as a Regular Candidate. She has obtained 683 marks out of 1100 and has been placed in Grade B Representing VERY GOOD.

The Examination was taken as a Whole/In Parts and the candidate passed in the following subjects:

1. ENGLISH

2. URDU

3. ISL. EDU-PAK STUDIES

4. ECONOMICS

5. STATISTICS

6. MATHEMATICS

Asstt. Secretary

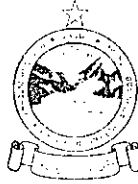
This certificate is issued without alteration or erasure.

Secretary

Certificate No: 37166

P-21

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 8292
Group: HUMANITIES

RESULT CARD
HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION
Part - I

Session: 2005 (Annual)

Name: BUSHRA GUL
Father Name: MASOOD KHAN
Reg No: 0044125059
Institution/
District: GGHSS BAFFA MANSEHRA

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-I held in the month of May/June as a Regular candidate

| Subjects | Marks | Marks Obtained | | | |
|--------------------|-------|----------------|-------|-------|-------------------------------|
| | | Theory | Pract | Total | Marks in Words |
| English | 100 | 56 | | 56 | Fifty-Six |
| Urdu (Comp) | 100 | 76 | | 76 | Seventy-Six |
| Islamic Education | 50 | 42 | | 42 | Forty-Two |
| Economics | 100 | 51 | | 51 | Fifty-One |
| Statistics | 100 | 51 | 19 | 70 | Seventy Only |
| Mathematics | 100 | 54 | | 54 | Fifty-Four |
| Total : 550 | | | | 349 | Three Hundred Forty-Nine Only |

Remarks :

Date : 11-August, 2005

Checked By : Zahid

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISe Abbottabad.
Visit us: www.biseatd.edu.pk

Controller of Examinations

[Handwritten signature and stamp]

P-22

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

Certificate No: 206043076



Roll No: 43076

Group: HUMANITIES

DETAILED MARKS CERTIFICATE HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION Part - II Session: 2006 (Annual)

Name: BUSHRA GUL
Father Name: MASOOD KHAN
Institution/
District: GGHSS BAFFA MANSEHRA

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May / June as a Regular Candidate

| Subjects | Marks | Marks Obtained | | | | | |
|-------------------|-------|----------------|-------|---------|-------|-------|-------------------------|
| | | Part-I | | Part-II | | Total | Marks in Words |
| | | Theory | Pract | Theory | Pract | | |
| English | 200 | 56 | -- | 66 | -- | 122 | One Hundred Twenty-Two |
| Urdu (Comp) | 200 | 76 | -- | 72 | -- | 148 | One Hundred Forty-Eight |
| Islamic Education | 50 | 42 | -- | -- | -- | 42 | Forty-Two |
| Pakistan Studies | 50 | -- | -- | 31 | -- | 31 | Thirty-One |
| Economics | 200 | 51 | -- | 54 | -- | 105 | One Hundred Five |
| Statistics | 200 | 51 | 19 | 60 | 18 | 148 | One Hundred Forty-Eight |
| Mathematics | 200 | 54 | -- | 33 | -- | 87 | Eighty-Seven |

Total: 1100

683-B Six Hundred Eighty-Three Only

Remarks :

Date : 05-August, 2006

Checked By : [Signature]

[Signature]
Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.biseatd.edu.pk

[Signature]
Distt: Courts Abbottabad

P-23

302566

Sr. No. AD

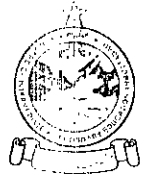
BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination

(Class X)

Session 2004 (Annual)

Group (SCIENCE GROUP)



Name: Bushra Gul

Father's Name: Masood Khan

Roll No 56646

| Subjects | Marks | MARKS OBTAINED | | | |
|-------------------|-------|----------------|----------|-------|------------------|
| | | Theory/A | Pract/ B | Total | In Words |
| 1. English | 150 | 54 | 46 | 100 | One Hundred Only |
| 2. Urdu | 150 | 53 | 47 | 100 | One Hundred Only |
| 3. Islamiyat | 75 | 57 | | 57 | Fifty-Seven |
| 4. Pakistan Study | 75 | 46 | | 46 | Forty-Six |
| 5. New Riazi | 100 | 60 | | 60 | Sixty Only |
| 6. Physics | 100 | 55 | 16 | 71 | Seventy-One |
| 7. Chemistry | 100 | 46 | 19 | 65 | Sixty-Five |
| 8. Biology | 100 | 48 | 24 | 72 | Seventy-Two |

Total 850

571-B Five Hundred Seventy-One Only

Checked By:

Remarks

Date: 18-06-2004

Note: Error / Omission are excepted

Khaksar and BRAINS Software Enterprise (KBSoft)

Controller of Examinations
BISE Abbottabad

Advocate
Distt. Courts Abbottabad

P-24



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SN: 0815

DETAILED MARKS CERTIFICATE

**MASTER OF ARTS (PREVIOUS)
ANNUAL EXAMINATION 2010**

Roll No: 9791
Name: Bushra Gul
Institution: MANSEHRA
District: MANSEHRA

Reg No: 0584MAFPX-BA7
Father's Name: Masood Khan
Subject: Islamiyat

| Course Title | Max. Marks | | Marks Obt: | | Total | Marks in Words | Remarks |
|---|------------|----|------------|----|------------|-------------------------------|--------------|
| | TH | PR | TH | PR | | | |
| (Al-Quran) Translation (1st Half) Commentator & Principles of Tafseer | 100 | | 60 | | 60 | SIXTY-SIX | Pass |
| Hadith and Principles of Hadith | 100 | | 72 | | 72 | SEVENTY-TWO | Pass |
| Islamic Jurisprudence (Text) | 100 | | 64 | | 64 | SIXTY-FOUR | Pass |
| Speech of Nabi (SAWS) & History of Islam | 100 | | 54 | | 54 | FIFTY-FOUR | Pass |
| Arabic Grammar and Literature | 100 | | 62 | | 62 | SIXTY-TWO | Pass |
| Total: | | | | | 318 | THREE HUNDRED EIGHTEEN | |
| Percentage: | | | | | | | 63.60 |

Date: 25-11-2010

Checked By:

Controller Examinations
Hazara University, Mansehra
November 25, 2010

Errors and Omissions are subject to subsequent rectification.
Note: Any mistake in Name, Father Name etc must be intimated within 15 days of the issuance date of this Certificate.

Muhammad Ali
Distt: Courts Abbottabad

P-25



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 20863

DETAILED MARKS CERTIFICATE

BA ANNUAL 2008

Roll No: 62242

Registration No: 0584MAFPX-BA7

Student's Name: Bushra Gul

Father's Name: Masood Khan

Institution/District: Mansehra

Part: Second

| Course Name | Maximum Marks | Marks Obtained | Marks In Words | Remarks |
|-----------------------|---------------|----------------|----------------------------|---------|
| Part: I Marks | 285 | 179 | One Hundred & Seventy-Nine | Pass |
| 1. English Compulsory | 75 | 25 | Twenty-Five | Pass |
| 2. Pakistan Studies | 40 | 32 | Thirty-Two | Pass |
| 3. Islamic Studies | 75 | 57 | Fifty-Seven | Pass |
| 4. Urdu | 75 | 40 | Forty | Pass |

Total: 550 / 333

Percentage: 60.55%

Division: First

Checked by:

Errors and omissions are subject to subsequent rectification. Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this certificate.

[Signature]

Controller Examinations
Hazara University, Mansehra
August 20, 2008

[Signature]
District Controller

Principal
Hazara University
Mansehra

HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

SNo: 2404

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL)
ANNUAL EXAMINATION 2011

Roll No: 3874
Name: Bushra Gul
Institution: MANSEHRA
District: MANSEHRA

Reg No: 0584MAFPX-BA7
F/Name: Masood Khan
Subject: Islamiyat

| COURSE TITLE | Max: Marks | | Marks Obt: | | Total | Marks in Words | Remarks |
|---|------------|--------------|------------|----|------------|-----------------------------|---------|
| | TH | PR | TH | PR | | | |
| MA-Previous Marks | | 500 | | | 318 | THREE HUNDRED EIGHTEEN | |
| (Al-Qura'an) Translation 2nd Half & Commentary along with Grammar | 100 | | 77 | | 77 | SEVENTY-SEVEN | Pass |
| Principles of Islamic Jurisprudence | 100 | | 65 | | 65 | SIXTY-FIVE | Pass |
| Islam & other World Religions | 100 | | 63 | | 63 | SIXTY-THREE | Pass |
| Koran & Philosophy of Islam / Islam in Contemporary Muslim World | 100 | | 76 | | 76 | SEVENTY-SIX | Pass |
| Islamic Economics / Islamic Politics / Islam & Science | 100 | | 69 | | 69 | SIXTY-NINE | Pass |
| General Viva Voce | 100 | | 44 | | 44 | FORTY-FOUR | Pass |
| Total: | | 1100 | | | 712 | SEVEN HUNDRED TWELVE | |
| Percentage: | | 64.73 | | | | | |
| Division: | | FIRST | | | | | |

Print Date: 29-01-2012

Checked By: *[Signature]*

Errors and omissions are subject to subsequent rectification
Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate

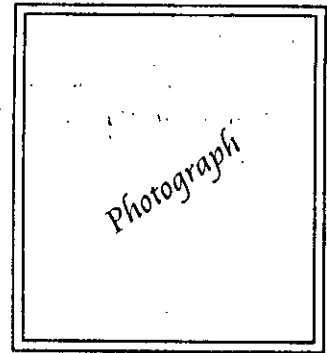
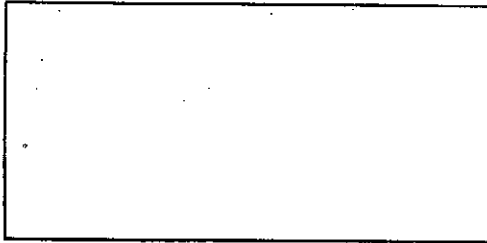
Controller Examinations
Hazara University, Mansehra
January 16, 2012

[Signature]
Taquli

P-27

Domicile Certificate

N.W.F.P. DISTRICT



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

I was born at Village/Mohallah DOHDYARI BAFFA KHURD

Tehsil MANSEHRA District MANSEHRA Hazara Division

Bushra Gul
Signature of applicant

Date 09/09/2004

Pursuance to the Declaration date 09/09/2004

Filled by Mr./Miss./Mrs BUSHRA GUL S/D/W/O MASOOD KHAN SWATI

Domiciled in North West Frontier Province, It is here by certified that the said BUSHRA GUL

is born of parents who are/were/permanent residents of the North West Frontier Province, having been born/settled within it.

Verification Over Leaf

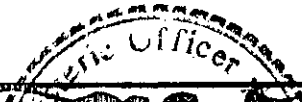
I have satisfied myself from Personal/my Knowledge verification that the above declaration is true and certify accordingly.

This 10th Day of Sept. 2004

Countersigned
[Signature]
District Officer
Revenue & Estate

No 11725 Dated 16/9/2004
Countersigned
[Signature]
District Officer,
Revenue & Estate

[Signature]
Deputy District Officer
Revenue & Estate



مقامہ تعیناتی کے لئے درخواستیں منظور کر کے ان کے لئے ملازمتیں فراہم کرنے کے لئے اقدامات کیے جائیں گے۔
ان کے لئے ملازمتیں فراہم کرنے کے لئے اقدامات کیے جائیں گے۔

Alam Zeb Khan
Nazim U/C Baffa Town
Member Zillahi Council manshra.

جناب عالی! یہ درخواستیں منظور کر کے ان کے لئے ملازمتیں فراہم کرنے کے لئے اقدامات کیے جائیں گے۔

مقامہ تعیناتی کے لئے درخواستیں منظور کر کے ان کے لئے ملازمتیں فراہم کرنے کے لئے اقدامات کیے جائیں گے۔

مقامہ تعیناتی کے لئے درخواستیں منظور کر کے ان کے لئے ملازمتیں فراہم کرنے کے لئے اقدامات کیے جائیں گے۔

9/9/04

Handwritten signature

Handwritten text: 10/9/04

PRINTED: MANAGER

10/9/04

F-100

Annex E,

P-29



OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following AT (Female) against vacant posts mentioned against each in BPS-15 @ Rs.8500-700-29500 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

| S# | Name | Family Name | Address | Place of Posting | Remarks |
|----|---------------|----------------------|--------------|----------------------|---------|
| 1 | BIBI HANIFA | ABDUL QAIM | BAFFA MERA | GGMS Balimang | AV/Post |
| 2 | BIBI HALIMA | QAZI RAFIQ UR REHMAN | MANSEHRA | GGMS Moolat Mera | AV/Post |
| 3 | SHAMILA | YOUSAF | MANSEHRA | GGMS Khait Sarash | AV/Post |
| 4 | ROMALA | M. IOBAL | TANDA | GGMS An | AV/Post |
| 5 | SAFIA DIDI | HADIB REHMAN | BAFFA MARA | GGMS Mathra Jal Gafi | AV/Post |
| 6 | MARIA | ASHRAF | MANSEHRA | GGMS Chansair | AV/Post |
| 7 | BUSHRA GUL | MASOOD KHAN | BAFFA | GGMS Kolti | AV/Post |
| 8 | FOZIA BIBI | FAZAL REHMAN | BLHAG BALA | GGMS Sinjli | AV/Post |
| 9 | ASIA KHATDOON | FAR ZAMAN | KAWAJ | GGMS Kawai | AV/Post |
| 10 | BIBI SADIA | GHULAM SARWER | MANSEHRA | GGMS Chamial | AV/Post |
| 11 | KALSOOM BIBI | CHANZEB | JISGRAN | GGMS Bai Bohal | AV/Post |
| 12 | PARVIN BIBI | MOHD YAQUB | SHINYARI | GGMS Bradar | AV/Post |
| 13 | SEEMI NAZ | SHEIKH AHMED | DAB MANSEHRA | GGMS Karon | AV/Post |
| 14 | SIDRA BIBI | GHULAM AHMED | BALAKOT | GGMS Mohandri | AV/Post |
| 15 | SHAZIA RANI | MOHD ISMAHIL | DADAR | GGMS Kamal Ban | AV/Post |
| 16 | SAMMIA | GHULAM FARID | OGH | GGMS Fateh Bandi | AV/Post |
| 17 | AYSHA | M SIDDIQUE | OGH | GGMS Bagrian | AV/Post |
| 18 | ZAUBRIA | M FAID | KALGAN | GGMS Madserian | AV/Post |

Note: The pay of the candidates falls at S# 8,11,&12 will be effective from 01/09/2012 after the re-opening of summer vacations Zone Schools.

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature will be stand automatically cancelled.
4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards CP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.

- 1 -

Multan
District Council
District Council
District Council

MANSEHRA



P-30

5. They will submit to this office, their all testimonial and along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Manshira)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny of all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice. Their one month pay/allowances if any shall be forfeited to Government Treasury.
9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
10. They should produce Age & Health Certificate from the MS DHQ Hospital Manshira.
11. They may not be handed over the charge if their age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1st July 2001 in pervious post, they are entitled for pension / gratuity etc.
13. No. TA/DA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

(Dr. Ambar Ali Khan)
DISTRICT COORDINATION OFFICER
MANSEHRA

Endst: No 7/0 -52/Estt: (F)Appt: AT (F)/2012 Dated Manshira the 14/6/2012
Copy to the:-

1. Secretary to Govt. of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Manshira.
- 4-5. District Officer (M&F) Local Office.
- 6-23. Principal/Headmistresses School concerned.
24. PA to District Coordination Officer, Manshira.
25. Budget & Accounts Officer, local office, Manshira.
- 26-43. Candidates concerned.

Attested

EXECUTIVE DISTRICT OFFICER
E&SE MANSEHRA

Mul...
Dist: ...
-2-
Khan Tanoli
Date
Manshira

P-33

Annex E



Certified that Mst Bushra Gul
D/O Masood Khan
Termination letter
25.05.2015
[Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Bushra Gul D/O Masood Khan working as AT GGHS/GGMS/GGP Kotri was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.
 - i) Syed Hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
 - ii) Mr. Akhlaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notice, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Bushra Gul D/O Masood Khan CT/PET/TT AT GGHS/GGM GGPS Kotri.

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

Endst: No 132-41 /AE- 3 /Estab: dated 03/03 /2015

Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress Kotri
7. SDEO (F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: Bushra Gul
10. Office File.

Attested

[Signature]

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

۱۔ یہ سلسلہ عجلتاً قانون صواب کی بنیاد پر ہونی چاہیے۔
اور سلسلہ سال 2012 سے ایف ڈی ایف ایف ایف ایف ایف پر
مراجعات رہیں۔

۲۔ یہ کہ ڈسٹرکٹ ایجوکیشن آفیسرز کے سامنے بغیر صرفی
اور ذاتی شہادتوں اور غائب شہادتوں show cause نوٹس دینے
بغیر اور بغیر قانونی جواز کے نوٹسوں کی طرف توجہ
میں نقل dismissed آرڈر صدر 3/2015 لف 2۔

۳۔ یہ سلسلہ میں تو فی فیڈ بیک کے کوئی نقصان نہ رہے۔
اور نہ ہی غیر قانونی طور پر ہونے پر۔ سلسلہ 2015
2012 سے دوبارہ 2015 تک نوٹسوں کی طرف توجہ
یوں سلسلہ کے حقوق مسلم ہوئے۔ سلسلہ کی جہاں
تعمیلی قابلیت AT پوسٹ کے ذریعے۔

امتیاز مہمانی جہت سے غیر قانونی بہ طرفی

جو کہ نہ صرف 3/2015 کو پیش کیے گئے

یہ سلسلہ کو بحال کرنے کے لیے

صرف 3/2015

انٹرنیٹ کے ذریعے
www.gov.pk کوٹ کر کے

قلمی

کورٹ فیس

وکالت نامہ

بعدالت KPK سرورین گورنمنٹ لیسٹاؤ

عنوان: لٹریٹریل AT بنام گورنمنٹ KPK ایجوکیشنل

منجانب: ایسٹ

نوعیت مقدمہ: اصل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

فہرستہ رضوان منیر ایڈووکیٹ جوائنٹی کی طرف سے اور ایسٹ

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب

موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول

ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم:

بمقام:

Attested

M. Arshad Khan
Adv High Court Ad

Bushno Gu
شریک

(1)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL

CAMP COURT ABBOTTABAD

Appeal No. 774/2015

Mst: Bushra Gull , D/O; Masood Khan AT, GGHS Kothri , R/O Mohalla Lehari Nomani Baffa Town,

Tehsil & District Mansehra.....APPELLANT

Versus

1. Govt of Khyber Pakhtun Khawa, through Secretary Elementary and Secondary Education, Peshawar and others.
2. Director Elementary and Secondary Education, Govt. of Khyber Pakhtun Khawa, Peshawar.
3. District Education Officer (Female) District Mansehra.

.....RESPONDENTS.

Written reply on behalf of Respondent 1 to 3.

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action to file the present appeal.
2. That the appeal is not maintainable in its present form.
3. That the appeal is time-barred and not entertain able.
4. That the appellant has not come to the tribunal with cleans hands.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appeal is based on false and mala fide hence deserves dismissal.
7. That the appeal is barred by law, hence liable to be dismissed on the score alone.
8. That the appellant has suppressed the original facts from this Honorable Service Tribunal, hence not entitled for any relief & the appeal is liable to be dismissed.

- 9. That the competent authority has dismissed the appellant in accordance with law / rules. Thereafter the appellant preferred an appeal against the said order before the appellate authority i-e Director E & SE KPK, who has converted the penalty of "Dismissal to removal"
- 10. The appointment of the appellant was illegal ab initio And against the law and rules, hence the authority has conducted the inquiry against the then appointing officer i-e EDO, E & SE, appointed to present appellant in which it was found that the appointed to present appellant along with the number of other teachers were made against the rules / law and the then EDO, E & SE Mansehra namely Umer Khan Kundi was removed from Service, by the competent authority i-e chief Minister KPK under E & D rules 2011. **(Copy is attached)**

FACTUAL OBJECTIONS:

- 1) Para No.1 is correct to the extent that respondent No. 3 announced the post of AT in the daily "The AAJ" dated 20-5-2011, while the rest of the para is incorrect.
- 2) Para No.2 is incorrect. The appellant was not a qualified candidate for appointment.
- 3) Para No.3 is incorrect. Remarks/ finding of the inquiry committee (The appellant, S. No 07 of the appointment order appointed at GGMS Kothri, award of weight age of MA to raise the merit is not justified as she was not MA at the time of submission of application form, result of Ma was declared on 29-01-2012). The appointment is against the recruitment rules/procedure. **(Annexure-A)**
- 4) Para No.4 is incorrect, hence denied.
- 5) Para No.5 is incorrect, hence denied.
- 6) Para No.6 is incorrect. Respondent No.3 issued show cause notice to the appellant after the finding of inquiry committee and the office of the Worthy Secretary E & SE Department Peshawar has directed the respondent No.3 to take action in the light of finding of the inquiry committee. **(Annexure-B)**
- 7) Para No.7 is incorrect. But the respondent No.3 was not satisfied with the reply of the appellant.
- 8) Para No.8 is incorrect. The appellant was removed from service after fulfilling the codal

formalities.

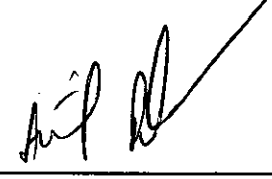
- 9) Para No.9 is incorrect. The appellant did not file departmental appeal to the higher authority.

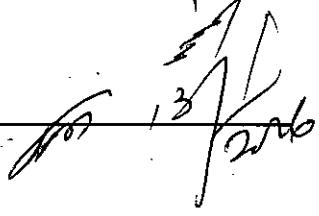
GROUND:-

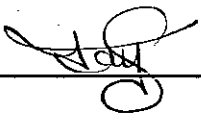
- a. Para No. a is incorrect. The appellant was appointed out of the merit, hence the authority has dismissed the appellant after fulfill the codal formalities.
- b. Para No. b is incorrect. The appellant was appointed out of laid down procedure and criteria.
- c. Para No. c is incorrect, hence denied. Further stated that the appellant is not entitled for the said post because the appointment of the appellant is against the recruitment rules / procedure.
- d. Para No. d is incorrect, hence denied.
- e. Para No. e is incorrect. The appellant was dismissed from service after fulfilling the codal formalities.
- f. Para No. f is incorrect. The appointment of the appellant was against the recruitment policy; hence after fulfilling the codel formalities the appellant was dismissed from service.
- g. Para No. g is incorrect. The appellant's name does not exist in the merit list.
- h. Para No. h is incorrect. The appellant was dismissed from service after the finding of high level inquiry committee.
- i. Para No. i is incorrect hence denied the appeal is time barred and liable to be dismissed non the score alone.

Prayers:

It is therefore humbly prayed that the instant appeal may kindly be dismissed.


Respondent No. 1 
Secretary E&SE, KPK, Peshawar.

Respondent No.2 
Director E&SE, KPK, Peshawar.

Respondent No. 3 
District Education Officer
(Female) Mansehra.

AFFIDAVIT

I, Mr. Sakinullah, ADEO(Litigation), District Education Officer (F) Mansehra, do, hereby solemnly affirm and declared that the contents of reply in the instant Appeal No.774-A/2015 titled case Mst: Bushra Gull, AT Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Court.



DEPONENT

6

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWR

Mst: Bushra Gull ,APPELLANT

VERSUS

Govt. of Khyber Pakhtun Khawa, through Secretary Education,
Peshawar etc..... Respondents

SERVICE APPEAL


**REAPPLICATION IN RESPECT OF SUSPENSION OF OPERATION OF IMPUGNED
ORDER DATED 03-03-2015.**

RESPECTFULLY SHEWETH:

1. The replication may please be considered as integral part of written-reply.
2. Para no. 2 is incorrect. The appellant was dismissed from the service after fulfilling all the codel formalities.
3. Para no. 3 in incorrect, hence denied.
4. Para No. 4 is incorrect.
5. Para No. 5 is incorrect. The applicant got appointment against the criteria of the merit policy.
6. Para No. 6 the ingredients of suspension are not fulfilled. The dismissal of the appellant was made in accordance with the law by the competent authority.

It is therefore most humbly prayed that the application may graciously be dismissed with cost.

Respondent No. 1 to 3 through
District Education Officer
(Female) Mansehra.



AFFIDAVIT

I, Mr. Sakinullah, ADEO (Litigation), District Education Officer (F) Mansehra, do, hereby solemnly affirm and declared that the contents of replication in the instant Appeal No. 774-A/2015 titled case Mst: Bushra Gull, AT Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Court.



DEPONENT



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the February 27, 2014

8

NOTIFICATION

NO.SO(S/M)E&SED/4-17/2013/Umar Khan DEO:

WHEREAS Mr. Umar Khan Ex-Executive

District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) was proceeded against under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. **AND WHEREAS** inquiry committee was constituted comprising the following officers to conduct formal inquiry against the accused officer, for the charges leveled against him in accordance with the rules.

- i. Syed Hidayat Jan, (PCS SG BS-20), Special Secretary, Agricultural Department, Khyber Pakhtunkhwa Peshawar (now Secretary Zakat, Usher, and Social Welfare Department.
- ii. Mr. Khallaq Baig Principal BS-20, RITE Male Haripur

3. **AND WHEREAS** the Inquiry committee after having examined the charges, evidence on record and explanation of the accused officer has submitted the report.

4. **AND WHEREAS** a show cause notice was served upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) dated 25-12-2013 circulated to him on 01-01-2014.

5. **AND WHEREAS** the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after having considered the charges and evidence on record, inquiry report, explanation of the accused officer in response to the Show Cause Notice and personal hearing granted to him by Secretary Establishment Khyber Pakhtunkhwa on behalf of Chief Minister Khyber Pakhtunkhwa on 14-02-2014 at 1100 hours, is of the view that the charges against the accused officer have been proved.

6. **NOW, THEREFORE**, in exercise of the powers conferred under section 14 of Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of **Removal from service** upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) with immediate effect.

SECRETARY

Endst: of Even No. & Date:

Copy forwarded to the: -

- 1- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- PSO to Chief Minister Khyber Pakhtunkhwa Peshawar.
- 3- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 4- District Education Officer (Male), Mansehra/ Karak.
- 5- Mr. Umar Khan District Education Officer Male (BS-19) District Karak.
- 6- District Accounts Officer Mansehra/ Karak.
- 7- PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 8- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 9- PS to Special Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 10- Office order file.

(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

INTRODUCTION:

DURING THE YEAR 2012 AND 13 IN OFFICE OF THE EDO, ELEMENTARY AND SECONDARY EDUCATION, DISTRICT MANSEHRA APPOINTMENTS OF FEMALE TEACHERS IN VARIOUS CADRES WERE CARRIED OUT PURSUANT TO AN ADVERTISEMENT PUBLISHED IN DAILY AAJ DATED: 20-05-2011, WHEREIN CERTAIN IRREGULARITIES/ILLEGALITIES IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE WERE NOTED, THEREBY RESULTING IN BREACH OF MERIT/ILLEGAL PRACTICE AND IGNORING THE RIGHTFUL CANDIDATES.

1. The Competent Authority has constituted the enquiry committee, comprising the following officers vide Notification No: SO(S/M)S&SED/4-17/2013 to conduct formal enquiry against Mr. Umar Khan Ex-EDO (E & SE) (BS-19) Mansehra now DEO(M) Haripur and Miss. Shamim Akhtar Deputy DO (E & SE) Mansehra (BS-18) and others for the charges mentioned in the charge sheet and statement of allegations(**Annex-A**)

SAYED HIDAYAT JAN (PCS SG BS-20), Special Secretary, Agriculture Department, Khyber Pakhtunkhwa, Peshawar.

MUHAMMAD KHALAQ BAIG, Principal (BS-20) R.I.T.E (M), Haripur.

2. Both the accused officers i.e. Mr. Umar Khan, Ex-DEO (E & SE) , Mansehra and Miss. Shamim Akhtar, Deputy District Officer(E & SE) , Mansehra have been charge sheeted as under:

a. The accused Mr. Umar Khan Ex-DEO (M) (E & SE) Mansehra presently posted as DEO(M) Haripur

i. That while posted as DEO (M) Mansehra (BS-19) committed the following irregularity (**Annex-I**)

MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.

b. Mst. Shamim Akhtar Deputy District Officer (BS-18) Female (E & SE), Mansehra

i. That while posted as Deputy District Officer (BS-18) (Female) (E & SE), Mansehra, committed the following irregularity (**Annex-II**)

MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.

3. **Venue of Enquiry:**

The enquiry was conducted in the office of Dy. DEO (Female) Mansehra.

1. **PROCEEDINGS:**

The committee informed both the accused officers vide No. PS/SSA/Enquiry /2013 Dated 16/7/2013. The District Accounts Officer Mansehra was also asked to provide copies of appointment orders of the teachers quoted in subject enquiry (**Annex-III**)

Copies of Charge sheets and Statements of allegations which were already sent to the other officers by the Department were re-submitted to them with the directions to submit their replies in the stipulated time.

The committee visited the office of DEO (Female) Mansehra on 01/8/2013 to conduct enquiry. Mr Umar Khan Ex EDO (E & SE) Mansehra and Miss Shamim Akhtar Dy. DEO (female) Manshera were present alongwith their staff and attended the enquiry proceedings (**Annex-IV**)

8. The Present DEO (M) and Dy. DEO (F) Mansehra were asked to provide all the record /files and other related record mentioned in the letter to the committee on the day of enquiry vide. No: SS (AD) Enquiry/2013 Dated 01/08/2013 (**Annex-V**).

9. The enquiry proceedings continued on daily basis w.e.f 01-08-2013 and on the very second day, one of the accused Mr. Umar Khan, insisted on his designation as recorded in his reply to the Charge sheet/statement of allegations submitted to the committee, claiming that he had not served as DEO (Male) Mansehra during the year 2012 rather he had served as EDO(E & SE)Mansehra. Despite persuasion by the committee regarding factual position of the designation as contained in the Education Department Notification No: SO(S/M E&SED/3-2/2012/Management Cadre dated: 28-12-2012, he was still adamant not to change his stance. (**Annex-V (A)**).

On account of this, the committee immediately informed and requested the Administrative Department for rectification of the designation of the accused as contained in the charge sheet/statement of allegation vide letter No: SS (AD) Enquiry/2013 dated: 02-08-2013 and subsequent reminder of even number dated: 17-08-2013 (**Annex-V(B-C)**) viz a viz reminder to the department from the Chief Minister Secretariat, vide No: SO-1/CMS/KPK/3-1/2013/3514 dated: 27-08-2013 (**Annex-V (D)**).

The proceedings remained continued until the same were adjourned due to falling of Eid-ul-Fitr Holidays, Independence day, coupled with appearance in the PHC by Chairman of the enquiry committee in an official case and proceedings on leave by most of the concerned staff of the office of DEO(F), Mansehra as well. The same were, however, resumed w.e.f 16-08-2013 and since action on rectification of designation of the accused couldn't be communicated to the committee, therefore, the Administrative Department was again reminded for early needful as well as granting an extension of two weeks vide letter No: SS (AD) Enquiry/2013 dated: 27-08-2013 (**Annex-V (E)**).

The Education Department vide their letter No: SO(S/M)E&SED/4-17/2013/Umer Khan dated: 02-Sept. 2013 intimated that a summary for rectification of the designation of the accused in the charge sheet /statement of allegation was moved to the Chief Minister, Khyber Pakhtunkhwa/Competent Authority. Similarly an extension for further two weeks w.e.f 27-08-2013 was also allowed vide letter quoted ibid (**Annex-V (F)**).

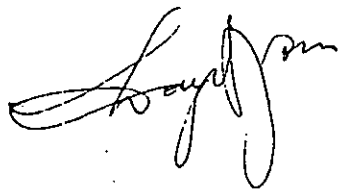

FACTS

REPLIES TO THE CHARGE SHEET:

REPLY OF MR UMER KHAN TO THE CHARGE SHEET:

10. Mr. Umar Khan EX- EDO E&SE Mansehra in his reply of charge sheet sent to the committee through registered cover vide NO:7475-76 Dated 27/07/2013 *has taken the stand that he had not served as DEO (M) BS-19 Mansehra during the period 2012 but worked as EDO E&S BS-19 Mansehra w.e.f.01/03/2011/to 31/12/2012*. He added that in the charge sheet it has been recorded that he while posted as DEO(M) BS-19 Mansehra committed the irregularities of making illegal appointments of female teachers during the year 2012& 2013 in violations of rules and prescribed procedure in District Mansehra whereas he had not worked as DEO Male Mansehra during the said period. He further added that he was neither an authority for appointments for female side nor made even a single appointment of female teacher in capacity of posting as District Education Officer BS-19 (M) Mansehra and hence question of making illegal appointments of CT,DM,PET,AT,QARI, PST(Female) during the year 2012 and 2013 in violation of rules and prescribed procedure does not arise. He requested for the exemption from the charges and with-drawl of charge sheet from him (**Annex-VI**).

| | | | | | |
|----|-----|----------------------------------|--|---|---|
| 5 | 190 | Tayyuba Bibi D/O Mohmmad Rasheed | Endst No. 6514-19/Estt: apptt:(F) AT/2011-12 Dated Manshera 11.8.2012 Appointed as AT at GGHS Kawai in BPS-15 | Appointment order was issued by the EDO E & SE Mansehra on acceptance of appeal . Her name was at S.No 190 of the merit list with score 22.16. Candidates from S.No 1 to 18 were appointed. The score of the last candidate was 49.52. The appointment is unjustified. DSC meeting was not held to decide the case and proper procedure was not adopted (Annex-XXXIII) . | The appointment is irregular and illegal. |
| 6. | 4 | Romala D/O Mohammad Iqbal | Endst No. 710-52/Estt:(F) apptt:AT/2012 Dated 14.6.2012 Appointed at GGMS Ahl in BPS-15 | Her MA Previous DMC was attached with her Forms at the time of submission of application but MA final result was declared on 16.1.2012. weightage of MA was awarded to her in the merit list which was not justified as the closing date for the receipt of the application form was 6.6.2011. Her merit was raised by award of weightage of MA which is against the recruitment policy and also the condition of advertisement. (Annex-XXXIV) . | The appointment is irregular and against the recruitment rules/procedure. |
| 7 | 7 | Bushra Gul D/O Masood Khan | Endst No. -710-52/Estt:(F) apptt:AT/2012 Dated 14.6.2012 Appointed at GGMS Kotril in BPS-15 | She was not MA at the submission of application form. Result of MA was declared on 29.1.2012 i.e. after the closing date. Award of fake weightage of MA to raised the merit is not justified (Annex-XXXV) . | The appointment is against the recruitment rules/procedure. |



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

(B)

No.SO(S/M) E&SED/4-17/2013/Umar Khan EDO BS-19
Dated Peshawar the August 25, 2014

(12)

To:

- i. The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
- ii. District Education Officer (Female)
Mansehra.

Mr. ... / ...
file use ... / ...
put up ...
D.E.O.

Subject: - ENQUIRY REGARDING APPOINTMENT/ GUIDANCE

I am directed to refer to your letter No:3076 dated 16-07-2014 on the subject noted above and to forward herewith a copy of inquiry report conducted by inquiry committee comprising the following officers.

- i. Syed Hidayat Jan, (PCS SG BS-20) Ex-Special Secretary Agriculture Department
Khyber Pakhtunkhwa Peshawar.
- ii. Mr. Khafaq Baig, Principal (BS-20) RITE Male Haripur.

2. It is requested that further action may be taken in the light of findings of the inquiry committee after issuance of show cause notices to the female teachers who were illegally appointed.

Encl: As Above:

Muqeeb-ur-Rehman
(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)