

24.07.2015

Appellant Deposited
Security & Process Fee

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 9.3.2015 which was not responded and hence the instant service appeal on 8.7.2015.

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. Representative submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant has been reinstated in service.

In the light of the said application, learned counsel for the appellant requested for withdrawal of the appeal as the grievances of the appellant have been redressed.

Dismissed as withdrawn. File be consigned to the record room.

Chairman
Camp Court A/Abad



20.10.15

ANNOUNCED
20.10.2015

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 770/2015

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. Kalsoom bibi 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 style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<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 style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 770/2015

Kalsoom Bibi D/O Chanzaib (AT GGHS Bhai Bohall) R/O , 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	APPEAL		1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12-24
4	Copy of appointment order and corrigendum	"C"	25-26
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	27-28
6	Copy of impugned dismissal order of appellant	"E"	30
7	Copy of departmental appeal /representation	"F"	31-32
8	Copy of merit list	"G"	33-34
9	Wakalatnama		

Dated: 7/7/2015

Kalsoom
Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 770/15 ①

A.W.P. Province
Service Tribunal

Diary No. 798

Dated. 8/7/15

Kalsoom Bibi D/O Chanzaib (AT GGHS Bhai Bohall) R/O , 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,

Filed to-day
8/7/15

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

1. That, respondent No 3 announced the posts of Qaria 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 Qaria. Copy of Advertisement is annexed as Annexure "A"

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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 Qaria in respondents' Department on the basis of merits and was posted in GGHS Afzal abad vide appointment order endrst No 893/942/ ESTT Qaria (F) APPTT; (f) 2012 Dated 16/6/2012. Copy of appointment order and corrigendum 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. 16.6.2012 onwards.
5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1636-45/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

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was mentioned against the name of appellant that "No relevant, sannad 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 Qaria and appeared in ETTA Test vide Roll No 454 dated 22.6.2011 and was placed at S. No 9 of the merits list 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

④

required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1726-35/AE-1/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 Qaria being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed at S.No 10 of the merit list. Copy of merit list is attached as Annexure "G". Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

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- b. That, as per educational record annexed with the appeal, the appellant has been appointed as Qaria according to the laid down procedure and criteria 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 Qarias 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 Qaria . 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

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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 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 Qaria 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

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removal of Umar Kundi from service, the appellant cannot be dismissed for the acts committed by the ex-EDO.


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

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order endrst. No 1636-45/AE-1/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

Kulson
Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

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BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Kalsoom Bibi D/O Chanzaib (AT GGHS Bhai Bohall) R/O., 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 ³/₁₅ 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

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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: -----/2015

Appellant

Through

Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

(10)

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Kalsoon Bibi D/O Chanzaib (AT GGHS Bhai Bohall) R/O ,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, Kalsoon Bibi D/O Chanzaib (AT GGHS Bhai Bohall) R/O ,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: 7/7 /2015

Kalsoon
Deponent

Amey A
P-11

حکومت صوبہ خیبر پختونخوا

31-Gilardain 3047G
ADP No. 102 (2010-11)

نمبر	تاریخ	موضوع
1	2-6-2011	...
2	8-6-2011	...
3	15-6-2011	...

Pre Bid Meeting
31-5-2011
11:00

Pre Bid Meeting
31-5-2011
11:00

- 1) ...
- 2) ...
- 3) ...
- 4) ...
- 5) ...
- 6) ...
- 7) ...
- 8) ...
- 9) ...
- 10) ...
- 11) ...

0937-870861

نمبر	تاریخ	موضوع
1	2-6-2011	...
2	8-6-2011	...
3	15-6-2011	...

Pre Bid Meeting
31-5-2011
11:00

...

0937-870861

Muhammad A. Amey
Advocate
Distt. Courts Abbottabad

DAIRY MESSING

Annex B

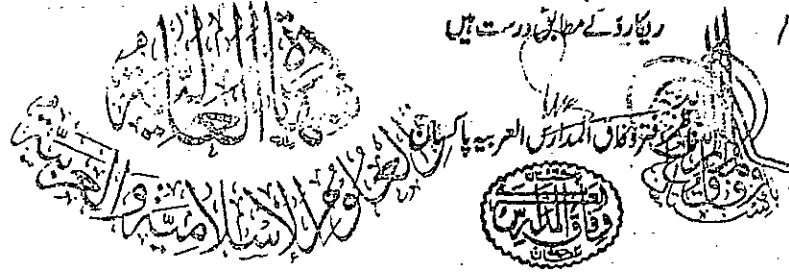
P-12

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

تقدیر کی بجائی ہے کہ سند ذاکے جملہ کوائف
ریکارڈ کے مطابق درست ہیں

4774

13-07-17



الحمد لله رب العالمين. والصلاة والسلام على خاتم الانبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسه
وفاق المدارس العربيه بپاکستان، تشهد بان الطالبة كلثوم بي بي بنت جناب من لاهور
المولودة في عام 1983 قد اتممت الدراسة العاليه في جامعه شميم الهادي ايجو كيشنل انسٹی ٹیوٹ للبنات و تخرجت في الامتحان النهائي المنعقد
و بتكيد ماذل فاون لاهور
تحت إشراف وفاق المدارس العربيه بپاکستان في رجب 1424 هـ بتقدير جيد جدا وبمساعدة على ذلك استحققت الشهادة العاليه
و رئيس الوفاق اذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى و يسأل الله عز وجل ان يسلك بها سبيل الصالحات العاملات.

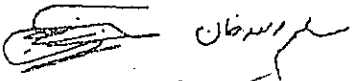
26171

Attested
M. J. J.

رقم التسجيل 1925-05-010406
رقم الملف 5009
الذريعات 460
محل الإصدار: المجلس الأعلى للتعليم بپاکستان
التاريخ: 22-09-2006

رقم الوثيقة: 1925/2006-07
رقم الوثيقة: 1925/07
رقم الوثيقة: 1925/07

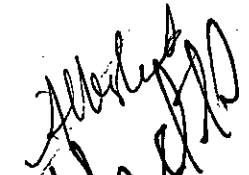
م. ج. ج.



M. J. J.

AT
Firmly
PRESIDENT
P. B. S. E.
Lahore

HEAD MISTRESS
Meera


 M. Naqvi, Advocate
 District Courts Abbottabad

28080001813

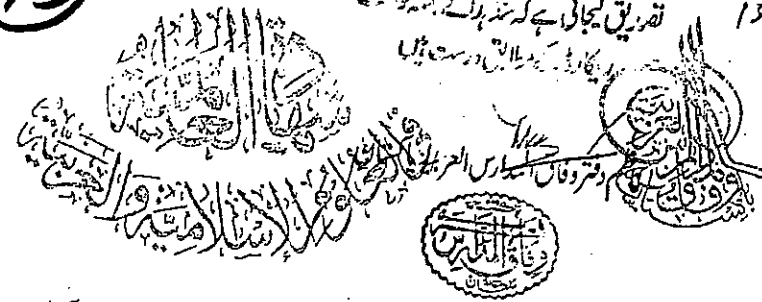
13

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

4781

13-07-15

تقریریں کی جاتی ہے کہ سند ہلکے جملہ کو ان کے
 پر کاروائی کے درمیان درست ہیں



الحمد لله رب العالمين. وانصرت لوجه الاسلام على خاتم الانبياء والمرسلين، وعلى الله وصحبه اجمعين. أما بعد، فإن رئاسة
 وفاق المدارس العربية بباكستان، تشهد بأن الطالبية كلثوم بي بي بنت جن زيب من لاهور
 المولودة في عام 1983 قد تمّت الدراسة الثانوية في جامعہ شمیم الیادی اوجو کیشنل انسٹی ٹیوٹ نظامیہ الامتحنان التمهائی المنعقد
 في باك ماڈل ٹاؤن لاهور تحت اشراف وفاق المدارس العربية بباكستان في رجب 1378ھ بتقدير جيد جدا. وبما على ذلك استحققت الشهادة،
 ورئيس الوراق اذ يفتي جهاد هذه الشهادة، يوصيها ببقوى الله تعالى ويسأل الله عز وجل ان يكف بها سبيل التالعات العاملات.

رقم التسجيل 1425-05-010406
 رقم البورس 1053
 الأذونات 391
 محل الإصدار
 التاريخ 13-09-2007



سم الله خان

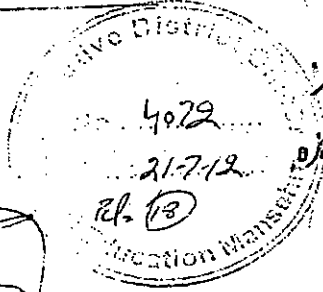
HEAD MISTRESS
 G.G.S Moorat Maira
 (Mansehra)



Date-13-07-2012

Supert II

14



مکرمی جناب ایگزیکٹو ڈسٹرکٹ آفیسر
ایڈمیٹری اینڈ سیکنڈری ایجوکیشن مانتھ

السلام علیکم ورحمۃ اللہ وبرکاتہ!

جناب کی طرف سے 08 طالبات کی اسناد کی فوٹو کاپیاں

بحوالہ لیٹر نمبر 1754 مورخہ 01-07-2012 برائے تصدیق موصول ہوئیں، جن کی تفصیل درج ذیل ہے۔

سیریل	نام	ولدیت	کیفیت
01	سعدیہ سرور	غلام سرور	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
02	زواریہ	فرید	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
03	کلثوم بی بی	چمن زیب	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
04	ماریہ اشرف	محمد اشرف	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
05	ناظمہ بی بی	عبدالستار	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
06	فوزیہ	فضل الرحمان	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
07	نگینہ الہی	فضل الہی	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
08	عائشہ صدیق	محمد صدیق	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔

اطلاعاً تصدیقاً

والسلام

ناظم مرکزی دفتر
وفاق المدارس العربیہ پاکستان

Attested
Muhammad Ali
Advocate
Distt: Courts Abbottabad



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مکرمی جناب ایگزیکٹو ڈسٹرکٹ آفیسر
ایڈمیٹری اینڈ سیکنڈری ایجوکیشن مانسہرہ

السلام علیکم ورحمۃ اللہ وبرکاتہ!

جناب کی طرف سے 07 طالبات کی اسناد کی فوٹو کاپیاں
بجوالہ لیٹر نمبر 1754 بمورخہ 01-07-2012 برائے تصدیق موصول ہوئیں، جن کی تفصیل درج ذیل ہے۔

سیریل	نام	ولدیت	کیفیت
01	ماریہ اشرف	محمد اشرف	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
02	کلثوم بی بی	چمن زیب	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
03	زوباریہ	فرید	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
04	عائشہ صدیق	محمد صدیق	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
05	سعدیہ سرور	غلام سرور	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
06	فوزیہ	فضل الرحمان	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔
07	حکیمہ الہی	فضل الہی	سند عالیہ ہمارے ریکارڈ کی مطابقت درست ہے۔ DX

اطلاعاً تمہاری طرف سے

والسلام

ناظم مرکزی دفتر

وفاق المدارس العربیہ پاکستان



Attested
M. A. A. A.
Distt. Courts And District

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Wifaq - ul - Madaris - il - Arabia, Pakistan.



وفاق المدارس العربیہ پاکستان

مرکزی دفتر: گارڈن ٹاؤن، شیرشاد روڈ، ملتان۔ فون نمبر: 6539665 - 6539376 - 061
ٹیکس نمبر: 6539485 - 061

Date 21-07-2009

HMT.157.1430

تصدیق نامہ

تصدیق کی جاتی ہے کہ!

کلثوم بی بی بنت جن زب من لاہور سن پیدائش 1983ء نے
وفاق المدارس العربیہ پاکستان کے تحت درجات عامہ تا عالمیہ تک کے امتحانات پاس کئے۔ وفاق المدارس کے
امتحانات میں کامیابی کے گریڈ کی تفصیل درج ذیل ہے۔

نمبر شمار	تناسب	تقدیر	گریڈ	ڈویژن
01	49.4640 فیصد	مقبول	سی گریڈ	تھرڈ ڈویژن
02	59.6550 فیصد	جید	بی گریڈ	سیکنڈ ڈویژن
03	79.6700 فیصد	جید جدا	اے گریڈ	فیسٹ ڈویژن
04	84.0010 فیصد	ممتاز	اے ون گریڈ	ایکسپلنٹ

نوٹ..... وفاق المدارس العربیہ پاکستان کے ضابطہ کے مطابق کامیابی کا معیار کم از کم (40) چالیس فیصد نمبرات حاصل کرنا ضروری ہے

اطلاع تحریر

والسلام

ناظم مرکزی دفتر

وفاق المدارس العربیہ پاکستان



Attested

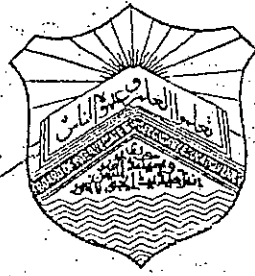
District Courts Abbottabad

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Serial No. 43839

Roll No. 0082703

Enrolment No. 18514-SR.02-2001



Superintendent
Verification Section

BOARD OF INTERMEDIATE & SECONDARY EDUCATION, LAHORE

Secondary school ANNUAL Examination 2001
SCIENCE Group

17

Certified that KULSOOM BIBI
son/daughter of CHUN ZAIB
School/District LAHORE
Date of Birth 12-02-1983 (TWELFTH FEBRUARY
EIGHTY THREE) has passed the

Secondary School Examination, Conducted by this Board in FULL as a PRIVATE
candidate. He/She offered the subjects and obtained the marks as follows.

1. URDU (COMPULSORY)
2. ENGLISH (COMPULSORY)
3. ISLAMIYAT (COMPULSORY)
4. PAKISTAN STUDIES (COMPULSORY)
5. MATHEMATICS (COMPULSORY)
6. PHYSICS
7. CHEMISTRY
8. BIOLOGY

VERIFIED
Dealing Official

MARKS	Maximum	Obtained
	150	109
	150	107
	75	057
	75	060
	100	084
	100	070
	100	048
	100	062
	850	597

TOTAL IN FIGURES: (FIVE HUNDRED AND NINETY SEVEN ONLY)

External Grade A Internal Grade

Lahore JULY 20, 2001

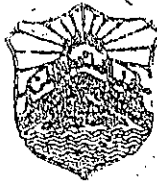
SECRETARY

A. Meeked
S. 34
HEAD MISTRESS
G.G.H.S. Minorat Malra
(Manshera)

Attested
M. H. M. Khan
Distt: Courts Abbottabad

Sr

No 008484



AP-2

6165

16-11-12

624-

Section of FICB

(CONFIDENTIAL)
REGISTERED

14/7/12 (F)
S. M. A. (F)

DISTRICT OFFICER,
ELEMENTARY AND SECRETARY
EDUCATION - MANSEHRA

18

Designation: FICB MANSEHRA

Please refer to your letter No. 1733 -

1733 -

02-7-2012

on the subject mentioned above.

The particulars (with photo/photocopy) shown in the enclosed certificate card of Roll No. 6273 for the Secondary School Certificate (Spring-
Autumn) Examination, 1972, bearing Serial No. 43839, have been checked
and they appear correct and found correct.

Checked/verified by

Head of Office

Office Superintendent

Date: 14/11/12

Assistant Director, Control Unit (Mansehra)
for Consideration of the Board

Attested

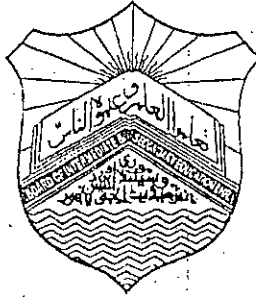
HEAD MISTRESS
G.G.H.S Moorat Majra
(Mansehra)

Lahore

Attested
M. A. Ishaq
Advocate
Distt: Courts Abbottabad

Matr. No. 01568

Roll No. 0002563



VERIF
Dealing



19

BOARD OF INTERMEDIATE & SECONDARY EDUCATION, LAHORE

Intermediate ANNUAL Examination 2003

PRE-MEDICAL Group

Certified that KULSOOM BIBI

Son/Daughter of CHUN ZAYB

Registered No. 00001-2205-2001

College/District: GOVT. ISLAMIA COLLEGE FOR WOMEN, LAHORE CANTT

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

MARKS

Sl. No.	SUBJECTS	MARKS	
		Maximum	Obtained
1.	URDU (COMPULSARY)	200	137
2.	ENGLISH (COMPULSARY)	200	105
3.	ISLAMIA TE (COMPULSARY)	50	39
4.	PAKISTAN STUDIES (COMPULSARY)	50	36
5.	PHYSICS	200	080
6.	CHEMISTRY	200	072 *
7.	BIOLOGY	200	078
TOTAL MARKS (In Figures)		1100	547

(In Words) FIVE HUNDRED FORTY SEVEN ONLY

External Grade: D Internal Grade: E

*QUALIFIED UNDER RULE 12 (CONCESSIONAL MARKS)

Lahore JULY 31, 2003

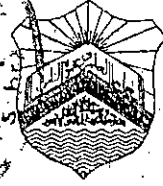
SECRETARY

[Signature]
HEAD MISTRESS
G.G.H.S Moorat Malra
(Manshra)

[Signature]
Muhammad Arshad Khan
Advocate
Distt: Courts Abbottabad

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION, LAHORE

6190
17/11/12



20

NO. 01748

No. 4608 VICER **CONFIDENTIAL**
REGISTERED

Dated 13-11-2012

To: District offices

Elem & Secy: Executive District office

B & SE Mansehra Supdt - 17

Subject: **VERIFICATION**

J
17/11/12
20

Please refer to your letter / Memo No. 1732 dated 2-7-12 on the subject cited above.

The particulars shown in the enclosed photostat copy of certificate / Result card of Roll No. 2563 for the Intermediate / Languages / P.T.C. / C.T. / O.T. (Spring / Autumn), Examination, 12003 bearing Serial No. 1568 have been checked with this office record and found correct.

M. Ramp
17/11/12

13/11/12

Encl:- **As above**

Assistant/Deputy Controller (Records)
for Controller of Examinations

47 Board Press 5000 - 16-03-2011

A. Desai

HEAD MISTRESS
G.G.H.S. Moorat Maira
(Mansehra)

Attested
Mulla... Advocate
Distt: Courts Abbottabad

University of the Punjab

Verification of Educational Qualifications.

File No. : R/5671/C

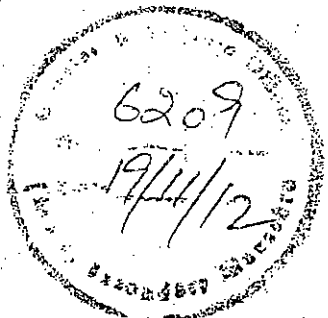
Dated : 29-08-2012



**CONFIDENTIAL
REGISTERED**

Support - II

From :
The Controller of Examinations,
University of the Punjab,
Lahore (Pakistan).



To :
District Officer,
Elementary & Secondary Education, MANSEHRA.

(R/5671/C 29-AUG-12)

D.O.

With reference to your letter No. 6668 dated August 16, 2012. It is hereby certified that the following particulars of the candidate(s) have been checked with the relevant record and found as under :-

Roll No.	Regd. No.	Examination	Name of the Candidate		Marks Obtained
			Father's Name	Division	
059540	2005-z-16499	Bachelor of Arts Annual, 2005	Kulsoom Bibi D/o Chan Zeb		422 / 800 Second



Prepared by: _____
(ABDUL_RAUF)

Checked by Asstt. / Admin Officer _____
The 18th October 2012

Assistant Controller (Certificates)
Assistant Controller (Certificates)
for Controller of Examinations,
University of the Punjab, Lahore.

Attested

HEAD MISTRESS
G.G.H.S Moorat Maira
(Mansehra)

Attested
Mairam Akbaruddin Tanoli
Advocate
Distt: Courts Abbottabad

University of the Punjab

Verification of Educational Qualifications

No. : R/5672/C

Dated : 29-08-2012


**CONFIDENTIAL
REGISTERED**

From :
The Controller of Examinations,
University of the Punjab,
Lahore (Pakistan).

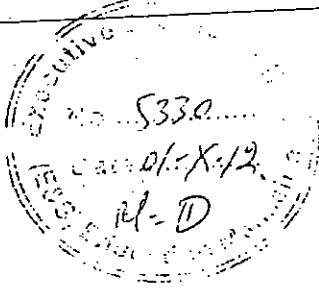
22

To :
The District Officer, Elementary & Secondary
Education MANSEHRA
(R/5672/C, 29-AUG 12)

With reference to your letter No. 6671 dated August 16, 2012. It is hereby certified that the following particulars of the candidate(s) have been checked with the relevant record and found as under :-

Roll No.	Regd. No.	Examination	Name of the Candidate Father's Name	Marks Obtained Division	
012275	2005-z-16499	M.A. Islamic Studies Part-II Annual, 2007	Kulsoom Bibi D/o Chan Zeb	503 / 1000 Second	

Handwritten notes:
D/C/O
503/1000
3/2/12



Prepared by: *[Signature]*
SHARJEEL

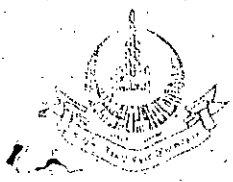
Checked by Asstt. / Admin Officer *[Signature]*
The 19th September 2012

[Signature]
Assistant Controller (Certificates)
Assistant Controller (Certificates)
for Controller of Examinations
University of the Punjab, Lahore.

Handwritten signature: A. Res led

[Signature]
HEAD MISTRESS
G.G.H.S. Moolvi Maira
(Mansehra)

[Signature]
Muhammad Khan Tanoli
Advocate
Distt: Courts Abbottabad



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
DEPARTMENT OF EXAMINATIONS
(Verification Section)

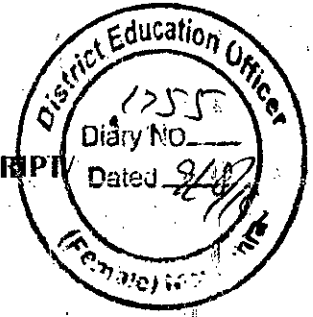
22

No. 1-3/Verif/ 40443

Dated: 14 Jul, 2014

D. STRICT EDUCATION OFFICER (FEMALE)
 HANSENRA

*ATS
 m. Aziz s/c
 Pick up one file
 for further decision
 24/7/14*



Subject: VERIFICATION OF CERTIFICATE(S)/DEGREE(S)/DIPLOMA(S)/TRANSCRIPT/ PRC ISSUED BY ALLAMA IQBAL OPEN UNIVERSITY

In reference to Letter No. 2624 dated 27 May, 14 stated above, it is certified that Certificate(s)/Degree(s)/Diploma(s)/ Transcript/PRC issued by the following students are correct:

Student & Father's Name	Programme	Registration No.	Certificate/Degree/Diploma/Transcript/PRC No.
CHAZEL	B.ED	09PLE10931	360333

[Signature]
 District Officer of Examinations
 Department of Examinations
 Allama Iqbal Open University
 Islamabad
 17/7/14

Attested
[Signature]
 Muhammad Arif Khan, B.A.
 Advocate
 Distt. Courts Abbottabad

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD



Serial No. 360333

Name: RABIA BISI
 Father's Name: CHAN ZAIB
 Address: HOUSE NO 705 STREET NO 4 BLOCK
 E. NISBAT COLONY
 LAHORE (CITY)
 LAHORE

Roll No. AE61166E
 Registration No. 09PLE10931
 Final Semester AUT-- 2010

24

BACHELOR OF EDUCATION (B. ED)

has successfully completed

The following courses are as under:

Course Code	Title of Course	Marks	
		Maximum	Obtained
AUT- 09 0514	EVALUATION, GUIDANCE & RESEARCH	100	64
AUT- 09 0501	ENGLISH (COMPULSORY)	100	68
AUT- 09 0518	EDUCATIONAL PSYCHOLOGY - I	100	77
AUT- 09 0519	SCHOOL ORGANIZATION	100	64
SPR- 10 0503	TEACHING OF CHEMISTRY	100	63
SPR- 10 0520	TEACHING OF BIOLOGY	100	64
AUT- 10 0555	WORKSHOP & TEACHING	100	94
AUT- 10 0552	ISLAM, PAKISTAN AND MODERN WORLD	100	59
AUT- 10 0512	PERSPECTIVES OF EDUCATION	100	71

Department Of Examinations
 (Certificate Section)
VERIFIED
 Sr. No. 360333 is
 bearing correct.
 Signatures: *[Signature]*

Attested
[Signature]
 Head mistress
 S.G.H.S. Sawan Maira
 Distt. Manshehra

Attested
[Signature]
 Muhammad Arshad Khan Tanoli
 Advocate
 Distt. Courts Abbottabad

CREDITS: 4
 Result Declared on JULY 18, 2011
 JULY 29, 2011

Total Marks / Obtained 600 / 624
 Percentage / Grade 69 / B

Controller of Examinations

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 on a candidate for 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.



P-25
Annex E

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	Father 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 Moorat Mera	AV/Post
3	SHAMILA	YOUSAF	MANSEHRA	GGMS Khait Sarash	AV/Post
4	ROMALA	M. IQBAL	TANDA	GGMS Ahi	AV/Post
5	SAFIA BIBI	HABIB REHMAN	BAFFA MARA	GGMS Mathra Jal Gali	AV/Post
6	MARIA	ASHRAF	MANSEHRA	GGMS Chansair	AV/Post
7	BUSHRA GUL	MASOOD KHAN	BAFFA	GGMS Kotri	AV/Post
8	FOZIA BIBI	FAZAL REHMAN	BLHAG BALA	GGMS Sinjli	AV/Post
9	ASIA KHATOON	FAR ZAMAN	KAWAI	GGHS 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	SHINKIARI	GGMS Bradar	AV/Post
13	SEEMI NAZ	SHEIKH AHMED	DAB MANSEHRA	GGMS Karori	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	OGHI	GGMS Fateh Bandi	AV/Post
17	AYSHA	M SIDDIQUE	OGHI	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-ship 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 GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.

Do (F)
Pl. issue corrigendum
b/c s.no. 2
being cancelled

18/9/12

[Signature]

Head-M-Comptroller
G.A. P.O. Mansehra

[Signature]
M. Usman

P-26

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 Manshra).
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or 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 Manshra.
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.

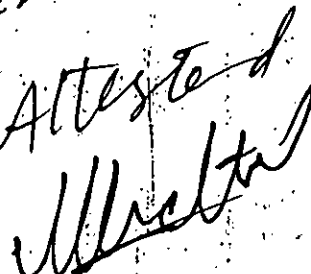
(Dr. Ambar Ali Khan)
DISTRICT COORDINATION OFFICER
MANSEHRA

Endst: No 710-52/Estt: (F)Appt: AT (F)/2012 Dated Manshra the 12/6/2012

Copy to the:-

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


EXECUTIVE DISTRICT OFFICER
E&SE MANSEHRA

Attested




P-27

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 2209 / DEO/ 2014

Email: deofmansehra@yahoo.com

Dated: 29/09 / 2014

Phone & Fax: 0997-302518

To

Anney D,

*Heed Milton
munat markia 1/2 m
6/5/15 B. B. B. B.*

Subject:-
Memo:

SHOW CAUSE NOTICE

Show Cause notice in respect of Mst Bulsoom Bibi D/O
Chay Zeb of your school IS attached herewith. You are
directed to serve the same to the teacher concerned and return one copy to this
office as a token of receipt.

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

Endst:No. _____

Copy to the:-

1. Deputy Commissioner, Mansehra.
2. District Monitoring Unit Mansehra.
3. ~~Sub-Divisional Education Officer (Female) Mansehra:-~~
4. ADEO Circle concerned is directed to ensure the attendance by the concerned teacher.

3-Heed

Attested

[Signature]
Muzammas Anwar
Distt. Courts Abbottabad

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.



P-28

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7709 / Establishment/ 2014

Email: deofmansehra@yahoo.com

Dated: 29/9/ / 2014

Phone & Fax: 0997-302518

SHOW CAUSE NOTICE

I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) rules, 2011, do hereby serve you Mst **Kulsoom Bibi** D/O Chan Zeb ,AT, Govt: Girls Middle School Bai Bohal Mansehra Show cause Notice as follows: *Not working at GGHS Murat Mera*

1) You were appointed as AT at GGMS Bai Bohal vide defunct Executive District Officer (E&SE) Mansehra Endstt: No 710-52/Estt Dated 14.06.2012 where you were stranger for recruitment process initiated through EATA:
Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet well& wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.

2) Going through the finding and recommendation of the inquiry committee, the material on record & other connected papers including your defiance before the inquiry committee:-

I am satisfied that you have committed the following acts/Omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
 - b) Inflected huge financial losses to the Govt: Treasury receiving pay are result of bogus appointment.
 - c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for un lawful appointment with coorandation of then EDO.
- 3) As a result thereof, I as competent authority have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- 4) You, are thereof, required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.
- 5) If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-party action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

Attested *Naghmana*

Muhammad Arshad Khan
Dist. Govt. Abbottabad

COMPETENT AUTHORITY

The District Education Officer
(Female) Mansehra

P-29

Subject: REPLY OF SHOW CAUSE NOTICE

Respected Madam,

Reference your show cause notice no 7709/Establishment/2014 dated 29-09-2014, the parawise reply is as under,

1. I Miss Kulsoom bibi D/O Chan Zeb AT GGMS Bai Bohal vide corrigendum by Education office GGHS Moorat Maira was appointed as AT at GGMS Bai Bohal by EDO (Elementary & Secondary) Mansehra.

I appeared in ETEA Test and got good grade. I was appointed as AT at S. No 11 among 18 Candidates appointed as AT (Annexure A).

Merit list was prepared in the office of EDO (Elementary & Secondary) preparation of Merit is not the job of applicant / candidate.

2. After appointment my all certificates were got verified from the concerned Board/University by the DEO(F) and then my pay was released.

3. a. I have committed not misconduct, dishonesty as I stood on merit which was prepared by Education Office competent Authority.

b. consequent of my service rendered to Govt: regularly, I got the salary on the behalf of that regular service.

c. I do not think to snatch the rights of others as I applied properly in due date, appeared in ETEA, Merit list prepared by Education Department and then got my appointment .

4. I received no report of Finding of inquiry committee conducted against me and have no information of any inquiry against me.

Therefore it is requested that I may please be exempted from such allegations as not committed by me and show cause may please be withdrawn.


Thanks

Yours Obediently,


HEAD MISTRESS
Govt. Girl High School
Mansehra

Miss. Kulsoom bibi
D/O
Chan Zeb AT GGMS
Bai Bohal
Now Working at
GGHS Moorat Maira

Dated: 16-10-2014

Attested

District Education Officer
Mansehra



Annex E

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

P-30

- 1:- Where as Mst: Kalsoom Bibi D/O Cham Zeb working as AT GGHS/GGMS/GGP Biq Bohal/Moorat Merg 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. Akhalhaq 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 Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhawa 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: Kalsoom Bibi D/O Cham Zeb CT/PET/TT AT GGHS/GGM GGPS Biq Bohal Present .ggHS Moorat Merg

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Encl: No. 1422-1501/AE-I /Estab: dated 03/03/2015.
Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress Biq Bohal/Moorat Merg
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office:
9. Mst: Kalsoom Bibi
10. Office File.

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Attested

[Signature]
Sub-Inspector
Mansehra

To

The Director,
Elementary & Secondary Education,
KPK Peshawar.

Annex F

P-31

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDST NO1492-150/AE-I/Estab: DATED 03-03-2015 WHEREBY MAJOR PANALTY OF DISMISSAL FROM GOVT SERVICE WAS IMPOSED UPON THE APPELLANT WITHOUT LAWFUL AUTHORITY (COPY OF IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS ANNEX "A")

PRAYER:

IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM THE DATE OF ITS ISSUANE DECLARING THE SAME WITHOUT LAWFUL AUTHORITY CONTRADUCTORY TO THE RECRUITMENT POLLCY & RULES AND RE-INSTATE THE APPELLANT WITH ALL BACK BENEFITS AT THE SAME STATION.

Respected sir,

I would like to invite your kind attention to the following facts in connection to colorful exercise of power on the part of authority i-e DEO (F) Mansehra.

- (I) That the then EDO (E&SE) Mansehra invited application for recruitment of teachers of various cadres in Distt : Mansehra through advertisement published in daily MASHRAQ (copy attached and marked as Annex "B")
- (II) That as per procedure appellant applied for the post of AT, TT & ETA test was conducted on 26-02-2011 and appellant appeared as a candidate under Roll No 1700338 and obtained 176 marks out of 300. (copy attached and marked as Annex "C")
- (III) That the then EDO conducted interview and scrutinized the documents of the candidates and merit list of the candidate was displayed for receiving objections. After due process the meeting of DSC was held and approved the cases of 18 candidates for appointment against the post of AT whereas the name of appellant falls at S.No 11.
- (IV) That appointment order of the appellant was issued under Edstt No 710-52/Estt: (F) Apptt: AT (F)/2012 dated 14-06-2012 and Appellant was posted against the post of AT at GMS Bahi Bohal Mansehra. (copy attached and marked as Annex "D")
- (V) That appellant continuously performing her duty without any break for the last 02 Years & 09 Months while she received a show cause notice whereby allegations were leveled against the appellant based on concoction and concealment of facts. The same are reproduced as below.

"YOU WERE APPOINTED AS AT AT GMS BAI BOHAL VIDE DEFUNCT EXECUTIVE DISTRICT OFFICER (E & SE) MANSEHRA ENDSTT NO 710-52 /ESTT QARIA(F) /2012 DATED 14-06-2012 WHERE YOU WERE STRANGER FOR RECRUITMENT PROCESS INITIATED THROUGH ETA ACCEPTANCE OF YOUR APPEAL AND SUBSEQUENTLY YOUR APPOINTMENT ORDER WAS THE RESULT OF MISUSE OF AUTHORITY BY THE THEN EDO ACCORDING TO HIS SWEET WILL AND WISHES AGAINST THE RECRUITMENT RULES" (Copy attached and marked as Annex "E")

Attested
Distt: Council

- (VI) That a reply was submitted in response to show cause notice whereas appellant adopted continuation that she was appointed after due recruitment process and her appointment order along with 17 other candidates was issued in a lot after the approval of DSC (copy attached and marked as Annex "F")
- (VII) That appellant received impugned order dated 03-03-2015 whereas the major penalty of dismissal from service has been imposed upon the appellant.
- (VIII) That appellant passed her professional qualification i-e SHAHADAT-UL-ALMIA from WAFUQUL MADARAS (MULTAN. (copy attached and marked as Annex "G")

Sir,

(a) Appellant was appointed after due process of recruitment through ETA test and appointment order of 18 candidates was issued after the approval of DSC. The appellant served for a period of 02 Years and 09 Months without any break to the entire satisfaction of department.

(b) No inquiry was conducted or initiated. No opportunity of defense offered. No personal hearing was made. How the authority passed the order in the light of E & D rules and under what charges/evidence imposed such a harsh punishment of dismissal from service.

It is stated that no such recommendation was made by the committee who was constituted to conduct inquiry against the then EDO.

In the light of above facts You are requested to set aside the impugned notification of dismissal from service that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station who was appointed against the post of AT in result of completion of due recruitment process on merit basis.

Dated: 09/03/2015

Yours Faithfully
(Appellant)
Kalsoom Bibi (AT)
GGHS Moorat Maira Mansehra

Attested
[Signature]
Muh...
Distt: Courts Abbottabad

Annex N C

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Final Merit List of Applicants For TAT-III Applied for Qaria District Mansehra

Sl	Roll No	Name	Father Name	Post Applied For	Address	DOB	DATE OF DEC. OF RESULT	ETEA Marks	Academic															T/Per	Remarks				
									ETEA MARKS		SSC			FA/FSC			BA/BSC			MA/MSC									
									Tot	Pass	Obt	Tot	Pass	Obt	Tot	Pass	Obt	Tot	Pass	Obt	Tot	Pass							
1	330	BIBI BUSHRA	FIDA HUSSAN	QARIA	MANGLOOR	02/2/1988	23/08/2007	184	300	24.533	548	850	8.671	687	1100	8.366	301	550	5.473								49.04		
2	756	SHAZIA	M AFZAL KHAN	QARIA	BANDA GESUCH	08/7/1977	2007	172	300	22.933	493	850	8.7	642	1100	8.755	268	550	4.873	678	1100	3.086						48.35	
3	85	AYSHA	M SADIQ	QARIA	OGHI MANSEHRA	16/3/1987	17/07/2008	136	300	18.133	541	850	9.547	641	1100	8.741	326	550	5.927	798	1100	3.632						45.98	Has be selected as AT
4	328	FATIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR (3)	01/4/1984	09/08/2003	164	300	21.867	567	850	10.01	614	1100	8.373	311	550	5.655								45.80		
5	583	Farhat Bibi	M.Hamayun	QARIA	Dhodial	16/2/1981	14-03-200	136	300	18.13333	489	850	8.278	688	1100	9.355	342	550	5.873	770	1100	3.5						44.66	
6	440	MANAZZA	MOHD HAMYUN	QARIA	TRANGRI BALA	20/4/1988	17/09/2008	152	300	20.267	517	850	9.124	729	1100	9.841	293	550	6.327								44.17		
7	454	MADHIA BIBI	ALI KHAN	QARIA	AFZALABAD	04/1/1988	01/10/2002	172	300	22.933	654	850	11.54	711	1100	9.695	0	0	0	0	0	0	0	0	0	0	0	43.95	
8	331	BIBI SAEEDA SALAMA	FIDA HUSAIN	QARIA	MANGLOOR (1)	18/4/1979	1998	176	300	23.467	507	850	8.947	531	1100	7.241	235	550	4.291								43.37		
9	688	JASMAT BIBI	ABDUL REHMAN	QARIA	LASSAN NAWAB	02/8/1981	17/05/2009	172	300	22.933	449	850	7.924	544	1100	7.418	280	550	5.091								43.00		
10	329	BIBI MARIUM	FIDA HUSSAIN	QARIA	MANGLOOR (4)	06/9/1986	09/08/2003	176	300	23.467	458	850	8.082	520	1100	7.091	240	550	4.364								42.51		
11	731	SAMMIYA RAHIEM	RAHIM SHAH	QARIA	OGHI MANSEHRA	08/2/1988	01/12/2010	132	300	17.6	510	850	9	738	1100	10.06	468	800	5.85	0	0	0	0	0	0	0	40.40		
12	327	SAIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR (2)	01/4/1982	09/08/2003	140	300	18.667	559	850	8.885	557	1100	7.595	235	550	4.273								39.79		
13	453	ALYIA BIBI	ALI KHAN	QARIA	AFZALABAD	27/8/1988	01/10/2002	164	300	21.867	578	850	6.871	538	1100	7.309	217	550	3.945								38.87		
14	92	AYSHA Knawal	Khalil ur Rehman	QARIA	Labarkot	08/12/1981	2004	164	300	21.86667	579	800	9.65	539	1100	7.35	0	0	0								38.27		
15	387	AMBER ZEB	ALAM ZEB	QARIA	PHULRA	31/3/1989	2008	148	300	19.733	701	1050	10.01	825	1100	8.523	0	0	0								36.27		
16	639	AISHA BANO	SHAHZADA	QARIA	M.M.POLE MANSEHRA	11/3/1990	20/05/2002	120	300	16	731	975	11.25	632	1050	8.028	0	0	0								35.22		
17	439	BUSHRA BIBI	LAL KHAN	QARIA	PHULRA	26/12/1991	2008	128	300	17.067	589	900	8.483	636	1100	8.673	0	0	0								35.16		
18	812	MAMOONA WAJID	WAHJID	QARIA	BHERKUND	12/8/1992	02/05/2003	120	300	16	612	900	10.2	657	1100	8.959	0	0	0								33.03		
19	200	HAMEEDA	MOHD YOUSAF	QARIA	PHULRA	20/6/1987	09/02/2009	124	300	16.533	788	1275	9.035	547	1100	7.459	0	0	0								30.26		
20	469	TABSUM	MOHD NAZIR	QARIA	OGHI MANSEHRA	27/4/1989	2007	156	300	20.8	662	1050	9.457	0	0	0	0	0	0								27.59		
21	139	SABA NOOR	SHEIKH NOOR ELLAHI	QARIA	MANSEHRA	18/2/1985	24/11/2000	132	300	17.6	665	1000	8.99	0	0	0	0	0	0								26.78		
22	2002	ASMA NAZ	MANZOOR HUSSAIN	QARIA	BEHALI			136	300	18.13333	490	850	8.647	0	0	0	0	0	0										

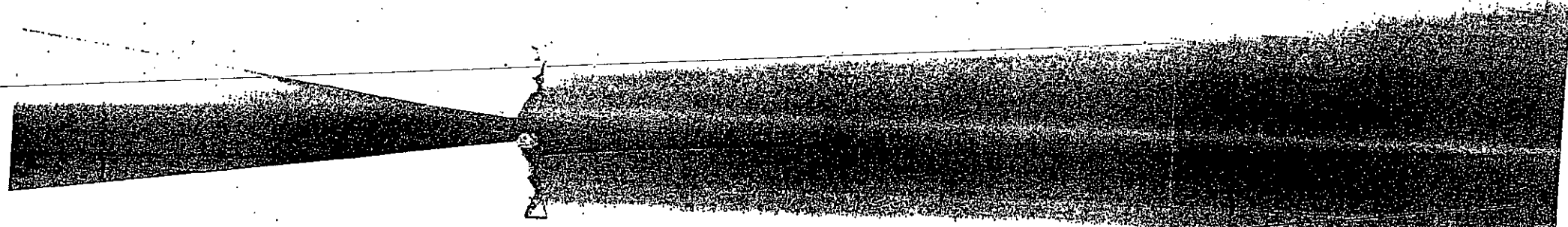
Distt. Courts Mansehra

Distt. Courts Mansehra

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Merit List of Applicants for TAT-II (Applied for Qaria) District Mansehra

Sl	Roll No	Name	Father Name	Post Applied for	Address	D/O BIRTH	DATE OF DEC./OF RESULT	ETE A Marks	ETE A MARKS		SSC			FA/FSC			BA/BSC			MA/MSG				
									Tot	Page	Obt	Tot	Page	Obt	Tot	Page	Obt	Tot	Page					
																				Obt	Tot	Page	Obt	Tot
23	81	TAHIRA NIAZ	NIAZ MOHD	QARIA	ICHRIAN MANSEHRA	12/10/1985	09/11/2004	132	300	17.6	361	850	6.371	0	0	0	0	0	0	0	0	0	0	23.97
24	275	GHAZALA JAVED	MOHAMMAD JAVEED	QARIA	MANSEHRA	17/05/1984		124	300	16.53333	421	850	7.428											23.98
25	698	SAIQA TABASUM	SAID ALAM	QARIA	GABDIAN MANSEHRA	02/02/1977	28/03/1998	120	300	16	426	850	7.518	0	0	0	0	0	0	0	0	0	0	23.52

A. M. Saad

A. D. O. District (P)

Jani
DO(Formal)
(E & S) Edu. Mansehra

A. D. O. District (P)

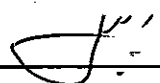
Muhammad Anwar Khan Tanoli
Advocate
Distt. Courts Abbottabad

MINI

تیٹی

کورٹ فیس

وکالت نامہ

بعدالت KPI سرویس مگر نیول لہستان اور
عنوان: کلثوم بی بی AT بنام گورنمنٹ KPI ایجوکیشن بورڈ
منجانب: ایڈووکیٹ
نوعیت مقدمہ: 

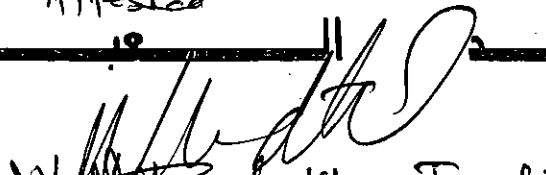
باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آس مقام
شہر ایڈووکیٹ جنرل ایڈووکیٹ ہائی کورٹ ایڈووکیٹ
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 بر حلف 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 برآمد استجارت نالاش بصرہ مفلسی کے دائرہ 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. Iqbal Khan Tanali
Adv High Court Attd

کلثوم بی بی
Kulsoom

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 770/2015

Respectfully Shewth

1. That the services appeal No: 770/2015 in respect of MST: kalsoom bibi is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4028-33 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of AT (Notification attached).

It is requested that the above mentioned appeal may kindly be dispose off please.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

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

NOTIFICATION.

WHEREAS, Mst Kalsoom Bibi, AT at Government Girls Middle School Bia Bohal District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1422-1501 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. 5500-09 dated 23-04-2015 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 was included in the merit list of A.T at S No.11 under ETEA R. No. 1700338. In accordance with the recruitment rules the prescribed qualification for the post of A.T is S.S.C in 2nd Division with Shahadat ul Alamia from Wafaq ul Madaris or 2nd Division in M.A Arabic and she possessed the qualification of S.S.C in 1st Division with Shahadat ul Alamia from Wafaq ul Madaris. Thus she fulfilled the condition of prescribed qualification for appointment for A.T post. She was appointed as A.T vide a general order Endst: No.710-52 dated 14/06/2012 at S. No.11.
2. Appeal may be accepted as her name existed in the ETEA merit list and she fulfilled the prescribed qualification for the subject post and eligible for 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. 1422-1501 dated 03/03/2015 and reinstate Ms. Kalsoom Bibi AT at Government Girls Middle School Bia Bohal District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4028-33 /F.No. 79/Appeals Female MSR Dated Peshawar the 25/8/2015

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.


25/8/15