

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.

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.Sakecnullah, 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Dismissed as withdrawn.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

ANNOUNCED
20.10.2015

Appellant Deposited
Security & Process Fee





20.10.15

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 766/2015

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. Memona Wajid 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. 766/2015

Mst Memona Wajid D/O Wajid Qaria (GGHS High School Nakot)
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			1-10
2	Copy of Advertisement	"A"	11-12
3	Copies of Documents/testimonial are annexed	"B"	12-27
4	Copy of appointment order and corrigendum	"C"	28-29
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	30-33
6	Copy of impugned dismissal order of appellant	"E"	34
7	Copy of departmental appeal /representation	"F"	35-38
8	Copy of merit list	"G"	
9	Wakalatnama		

Dated: 7/7/2015

Memona Wajid
Appellant

Through

Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 766/2015 ①

A.W.P. Province
Service Tribunal
Diary No. 809
Dated 8-7-2015

Mst Memona Wajid D/O Wajid Qaria (GGHS High School Nakot)
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,

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"

Filed to the
10/7/15
8/7/15

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 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

④

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 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

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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 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,

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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 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

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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.

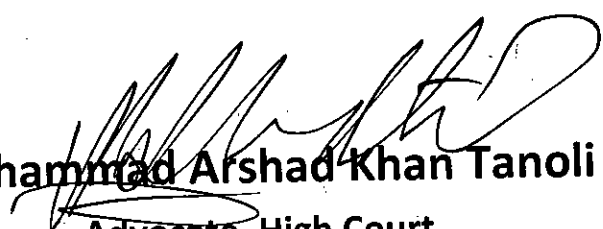
- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribed period of limitation

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


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

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BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst Memona Wajid D/O Wajid Qaria (GGHS High School Nakot)
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 ¹¹³⁻² 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: 7/7/2015

محمد ارشد خان
Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

(15)

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst Memona Wajid D/O Wajid Qaria (GGHS High School Nakot)
R/O Tehsil & District Mansehra

.....Appellant

VERSUS

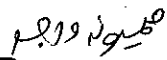
1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

AFFIDAVIT

I, Mst Memona Wajid D/O Wajid Qaria (GGHS High School Nakot)
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: _____/2015


Deponent



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Annex B



جامعة دار الحديث الحريّة للإسلام والعلوم
بمكة المكرمة



الْحَمْدُ لِلَّهِ رَبِّ الْعَالَمِينَ وَالصَّلَاةُ وَالسَّلَامُ عَلَى خَاتَمِ النَّبِيِّينَ سَيِّدِنَا مُحَمَّدٍ وَعَلَى آلِهِ وَصَحْبِهِ أَجْمَعِينَ
 وَبَعْدُ تَشْهَدُ رَأْسَهُ جَامِعَةُ حَدِيثَةِ الْإِسْلَامِ أَيْبِتُ آبَاد بَانَ الطَّالِبَةِ سَمَوْنِ وَاجِدِ
 بِنْتِ وَاجِدِ مِنْ مَالِسِرِ الْمَوْلُودَةِ ١٩٩٢ - ٧ - ١٤ قَدَحِطَتْ
 الْقُرْآنَ الْكَرِيمَ كَامِلًا بِظَهْرِ الْغَيْبِ فِي جَامِعَةِ حَدِيثَةِ الْإِسْلَامِ أَيْبِتُ آبَاد عَامَ ٢٠٠٠ وَبَحَثَتْ
 فِي اخْتِبَارِ الْحِفْظِ الْمُنْعَقِدِ تَحْتِ إِشْرَافِ جَامِعَةِ حَدِيثَةِ الْإِسْلَامِ بِتَقْدِيرِ جَيْدًا وَبِنَاءِ عَلَيَّ
 ذَالِكِ قَرَّرَ مَجْلِسُ الْجَامِعَةِ مِنْهَا شَهَادَةَ حِفْظِ الْقُرْآنِ الْكَرِيمِ وَرَأْسِ الْجَامِعَةِ إِذْ عَمَّرَهَا
 هَذِهِ الشَّهَادَةُ يُوصِيهَا بِتَقْوَى اللَّهِ عَزَّ وَجَلَّ، وَأَنْ تَتَعَاهَدَ الْقُرْآنَ الْكَرِيمَ بِتِلَاوَتِهِ أَبَاءَ اللَّيْلِ وَالنَّهَارِ
 أَطْوَافَ النَّهَارِ وَأَنْ تَحْمَلَ بِتَعَالِيهِ السَّمْعَاءِ وَأَنْ تُحَلِّمَهُ غَيْرَهَا وَأَنَّ اللَّهَ الْمَوْقِفُ

رقم الشهادة ٥١
 اللوحات ٥٥ / ١٠٠
 التاريخ ٢٠٠٠ - ٥٥ - ٢٠

ختم الجامعة

المدرسين
شهادة

مدير المدرسة
شهادة

3

115057



شہادت



وزارت تعلیم و تربیت، پنجاب

ادساق نمبر 08-04-06284 تاریخ الحاق 19-04-2005 -- تاریخ اجراء 28-06-2014 / 19-04-2005 تاریخ تسخیر 26-06-2014

Only For Education
Mansoor
27/6/14

تصدیق کی جاتی ہے کہ مدرسہ حدیقہ الاسلام للبنات المحصنات محلہ شیخ فخری اقبال روڈ سیلانی

ضلع اینٹ آباد ضویہ خیر بختونخواہ کا الحاق بحیثیت مدرسہ

وزارت تعلیم و تربیت، پنجاب سے منظور کیا گیا ہے



دستخط صدر
شیخ سلیم اللہ خان

دستخط ناظر اعلیٰ

محمد حنیف جالندھری

مکملی کفتر وفاق المدارس العربیة پاکستان، مصلحان





شهادة الفراع من التجويد والقراءات للفرقان: الحميد

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ وَاللَّهُ أَكْبَرُ



الحمد لله الذي انزل على عبده الكتاب ولم يجعل له عوجا ونشكره على ان جعلنا من حملة هذا الكتاب الحميد و
 وفقنا لحفظه و دارسته على وجه الترتيل والتجويد والصلوة والسلام على سيدنا محمد خاتم الرسل والانبياء ولى
 اله واصحابه الذين بلغوا القرآن واقرؤه وعلموه ومهدوا الطريق الى يوم الدين فان الاخت مسمونة ابرنت واجه من حائز
 المولود في عام 1992 قدورد الجامعة حديقة الاسلام للبنات ايت آباد قد قرا عن الكتب الدراسية في هذا الفن
 ونجح في الاختبار النهائي بتقدير جيد جدا في عام 2011 فلما فرغ واستجارنا وطلب من شهادة اجزنا له متوكلين على الله
 بان يقرأ ويقرى بالشرائط المعتمدة عند علماء هذا الفن ومشيخته واعطينا هذا الشهادة لتكون له تذكرة وحجة
 عند امس الحاجة ونوصيه بتقوى الله تعالى س او علانيه و با تشمير لخدمة القرآن والعلوم القرآنية ونشرها وان
 يقتدى بالسلف الصالحين ويختار هديهم وسيات حسب استطاعته وان لا ينسانا في دعوته الصالحة ونسأل الله
 ان يوفقنا واياه لما يحبه ويرضاه وهو ارحم الرحمين واخر دعوانا ان الحمد لله رب العالمين

ختم الجامعة

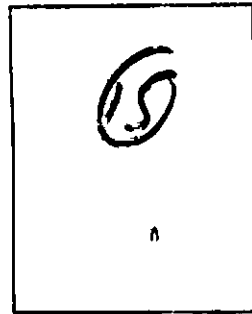
المدرس

مدير

رقم الشهادة

38

DOMICILE CERTIFICATE



I declare that I was born of parents who permanently domiciled in N.W.F.P Having belong to it by birth / settled in it.

I belong by birth village / Mohallah SAWATI BHERKUND

Tehsil MANSEHRA.

District MANSEHRA.

Memoona
Signature of the applicant

Dated: 08 / 11 / 2015.

Pursuant to the declaration dated 08 / 11 / 2015. Filed.
By WAJID son / daughter of WAJID
Domiciled in N.W.F.P is hereby Certified that the said WAJID
is born of parents who was permanent residents of N.W.F.P having belonged to by
birth / settled in it. APPLICANT.

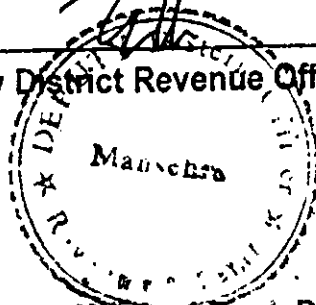
I have satisfied myself from personal / my knowledge, verification that the above declaration is true and certify.

This 27th Day of Feb. 2006

[Signature]
Deputy District Revenue Officer

No 3389 Dated 27-2-06
COUNTER SIGNED

[Signature]
DISTRICT REVENUE OFFICER
MANSEHRA.



Wahed Book Depu &
Boot House
Main Chowk Mansehra.
Ph # 305476

[Signature]
Advocate
Pottabao

District Council
Revenue & Excise Mansehra

گورنر کا حوالہ ہے کہ قبوہ دختر و احمد خان قوم سواتی ساکن قندھار سے تعلق رکھتے ہیں۔
 قبوہ دختر احمد خان قوم سواتی ساکن قندھار سے تعلق رکھتے ہیں۔
 قبوہ دختر احمد خان قوم سواتی ساکن قندھار سے تعلق رکھتے ہیں۔

M. Arif Khan

Chanzada
 M. Arif Khan
 MAIB NAZAM
 tion Council Bher. Ke.

من زارہ ہر مار صفحہ ۱۰۵

(16)

قبوہ دختر احمد خان قوم سواتی ساکن قندھار سے تعلق رکھتے ہیں۔
 قبوہ دختر احمد خان قوم سواتی ساکن قندھار سے تعلق رکھتے ہیں۔
 قبوہ دختر احمد خان قوم سواتی ساکن قندھار سے تعلق رکھتے ہیں۔

M. Arif Khan

20/2/06

M. Arif Khan

M. Arif Khan

۲۰/۲/۰۶

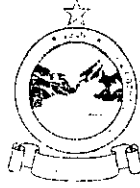
M. Arif Khan

۲۰/۲/۰۶

Reg No - 0055006006

8300

Certificate No: AIB

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

Roll No: 8282

Group: SCIENCE

DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATIONSession: 2007 (Annual)

17

Name: MEMOONA WAJID

Father Name: WAJID

Institution / District: GOVT. GIRLS HIGH SCHOOL BHER KUND

MANSEHRA

has secured the marks shown against each subject in the Secondary School Certificate Examination held in the month of April / May as a Regular candidate.

Subjects	Total Marks			Marks Obtained		Total	Marks in Words
				Theory / A	Pract / B		
English	75	75	150	56	56	112	One Hundred Twelve
Urdu	75	75	150	61	56	117	One Hundred Seventeen
Islamiyat	75		75	55		55	Fifty-Five
Pakistan Studies	75		75	51		51	Fifty-One
Mathematics	75	75	150	59	48	107	One Hundred Seven
Physics	85	15	100	42	14	56	Fifty-Six
Chemistry	85	15	100	35	12	47	Forty-Seven
Biology	85	15	100	55	12	67	Sixty-Seven

Total : 900

612-B Six Hundred Twelve Only

Remarks

Dated: 16-JUL-07

Checked By: _____

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

Visit us at: www.biseatd.edu.pk

Attested Controller of Examinations

[Signature]
Advocate
BISE ABBOTTABAD

ADA No 220556

Roll No. 8282

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



18

Abbottabad N.W.F.P. - Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2007

This is to certify that MEMOONA WAJID

Daughter of WAJID

A candidate from GOVT. GIRLS HIGH SCHOOL BHER KUND MANSEHRA
has passed the Secondary School Certificate Examination of the Board of
Intermediate and Secondary Education, Abbottabad held in April/May, 2007 as a
regular candidate. She has obtained 612 marks out of 900 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 TWELFTH AUGUST

One Thousand Nine Hundred and NINETY-TWO (12-08-1992)


Asstt. Secretary

This certificate is issued without alteration or erasure.


Secretary

Attested

Muh. Aslam Khan
Adv. Secy
Distt. Courts Abbot

Certificate No: AB 106054

19

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 7424

Group: PRE-MEDICAL

DETAILED MARKS CERTIFICATE HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION Part - I

Session: 2008 (Annual)

Name: MEMOONA WAJID
Father Name: WAJID
Reg No: 0075212006
Institution/
District: GOVT. GIRLS DEGREE COLLEGE NO 2
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	60		60	Sixty Only
Urdu (Comp)	100	64		64	Sixty-Four
Islamic Education	50	38		38	Thirty-Eight
Physics	100	32	15	47	Forty-Seven
Chemistry	100	30	10	40	Forty Only
Botany	100	44	9	53	Fifty-Three
Total : 550				302	Three Hundred Two Only

Remarks :

Date : 09-August, 2008

Checked By : [Signature]

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]
Controller of Examinations

[Signature]
MISS AISHA BID
M.Sc (Stats) B.Ed. DIT, DIMP
LECTURER IN STATISTICS

Certificate No: AB 173553

20

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 46230
Group: PRE-MEDICAL

HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION DETAILED MARKS CERTIFICATE

Part - II
Session: 2009 (Annual)

Name: MEMOONA WAJID
Father Name: WAJID
Reg No: 0075212006
Institution/
District: GOVT. GIRLS DEGREE COLLEGE NO 2 MANSEHRA

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

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	60	--	76	--	136	One Hundred Thirty-Six
Urdu (Comp)	200	64	--	72	--	136	One Hundred Thirty-Six
Islamic Education	50	38	--	--	--	38	Thirty-Eight
Pakistan Studies	50	--	--	38	--	38	Thirty-Eight
Physics	200	32	15	46	9	102	One Hundred Two
Chemistry	200	30	10	39	10	89	Eighty-Nine
Biology	200	44	9	52	13	118	One Hundred Eighteen

Total : 1100

657-C Six Hundred Fifty-Seven Only

Remarks :

Date : 23 July, 2009

Checked By :

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

Attested -

Mubashir Rashid Khan Tanoli
Advocate
Distt: Courts Abbottabad

Roll No. 46230

ADAN? 108228

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2009
Pre-Medical Group

This is to certify that MEMOONA WAJID

Daughter of WAJID

A candidate from GOVT. GIRLS DEGREE COLLEGE NO 2 MANSEHRA

has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in April/May 2009 as a Regular candidate. She has obtained 657 marks out of 1100 and has been placed in Grade C Representing GOOD.

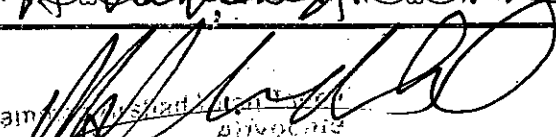
The Examination was taken as a Whole/In Parts and the candidate passed in the following subjects:

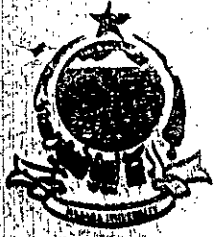
- | | | |
|-----------|-------------|-----------------------|
| 1.ENGLISH | 2.URDU | 3.ISL.EDU-PAK STUDIES |
| 4.PHYSICS | 5.CHEMISTRY | 6.BIOLOGY |


Asstt. Secretary

This certificate is issued without alteration or erasure.


Secretary

Muham 
District Council Abbottabad



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 1081

DETAILED MARKS CERTIFICATE

BSc ANNUAL EXAMINATION 2010

22


Roll No: 1081 Reg No: 10-MSRG/II-47
Name: Memoona Wajid Father's Name: Wajid
Institution / District: GOVT. GIRLS DEGREE COLLEGE NO.2 Part: First
MANSEHRA

Course Title:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
ISLAMIYAT	60		38		38	THIRTY-EIGHT	Pass
BOTANY	50	25	28	21	49	FORTY-NINE	Pass
ZOOLOGY	60	15	37	11	48	FORTY-EIGHT	Pass
GEOGRAPHY	60	15	41	10	51	FIFTY-ONE	Pass
Total:					186	ONE HUNDRED EIGHTY-SIX	


Total: 285

Percentage: 65.26


Print Date: 23-08-2010

Checked By: 

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
August 23, 2010

Attested


Muhammad Arshad Khan Tanoli
Advocate
Distt: Courts Abbottabad



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

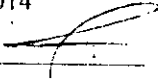
MASTER OF ARTS (PREVIOUS) ANNUAL EXAMINATION 2013

24

Roll No: 12059Reg No: 10-MSRG/II-47Name: Memoona WajidFather's Name: WajidInstitution / MANSEHRA
District Subject: Islamiyat

Course Title:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
(Al-Qura'an) Translation 1st Half Commentator & Principles of Tafseer	100		73		73	SEVENTY-THREE	Pass
Hadith and Principles of Hadith	100		67		67	SIXTY-SEVEN	Pass
Islamic Jurisprudence (Text)	100		68		68	SIXTY-EIGHT	Pass
Seer'at un Nabi (SAWS) & History of Islam	100		50		50	FIFTY	Pass
Arabic Grammar and Literature	100		74		74	SEVENTY-FOUR	Pass
Total:	500				332	THREE HUNDRED THIRTY-TWO	
Percentage:	66.40						

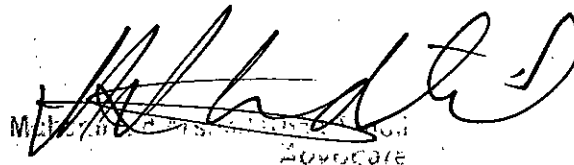
Print Date: 27-02-2014

Checked By: 


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
26 February, 2014

Attested,



Advocate
Distt: Courts Abanobad



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

23

DETAILED MARKS CERTIFICATE

BSc ANNUAL EXAMINATION 2011

Roll No: 16009Reg No: 10-MSRG/II-47Name: Memoona WajidP/ Name: WajidInstitution/ GOVT. GIRLS DEGREE COLLEGE NO.2Part: SecondDistrict MANSEHRA

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks →	285				186	ONE HUNDRED EIGHTY-SIX	
PAKISTAN STUDIES	40		33		33	THIRTY-THREE	Pass
BOTANY	50	25	34	16	50	FIFTY	Pass
ZOOLOGY	60	15	45	9	54	FIFTY-FOUR	Pass
GEOGRAPHY	60	15	42	10	52	FIFTY-TWO	Pass
Total:	550				375	THREE HUNDRED SEVENTY-FIVE	

Percentage: **68.18**Division: **FIRST**Print Date: 15-08-2011

Checked By: _____

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.

A. Masood
Controller Examinations

Hazara University, Mansehra

August 15, 2011

Muhammad Arshad Khan Jancii
Advocate
Distt. Courts, Abbottabad

1900

Board of Intermediate & Secondary Education ABBOTTABAD

DETAILED MARKS CERTIFICATE ORIENTAL LANGUAGES EXAMINATION



HONOURS IN ARABIC
Session-2008 (Annual/Supplementary)

Name MEMOONA WAJID

Roll No. 149

25

Father's Name WAJID

SUBJECT	Total Number of Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. Paper I	100	76	
2. Paper II	100	54	
3. Paper III	100	65	
4. Paper IV	100	42	
5. Paper V	100	62	
6. Paper VI	100		
Total	600	349	Three Hundred Forty-Nine Only

This Certificate is issued errors and omission excepted.

Prepared by: [Signature]

Checked by: [Signature]

Date 18 Dec, 2008

Controller of Examinations (Secrecy)
Board of Intermediate & Secondary Education
ABBOTTABAD

Attested

Muhamad [Signature]
Advocate
Cantt. Abbottabad.

Attested
Miss Aisna Bto
M.Sc (Statistics) B.Ed. DIT, D.A.
LECTURER IN STATISTICS
Cantt. Abbottabad

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

26

Roll No. 16009

384

Regd. No. 10 MRC/11-47

GOVERNMENT GIRLS DEGREE COLLEGE NO. 2 MANSEHRA

B.A/B.Sc. Annual Exam: **PROVISIONAL CERTIFICATE**

Certificate that Miss. Mahmouna wajid
Daughter of wajid and a regular
student of this college under college Roll No. 546. She appeared as regular
candidate in the B.A/B.Sc. (Annual) Examination of the Hazara University, Mansehra &
according to the Result Gazette issued by the Hazara University is declared successful in
the above said Examination, Obtaining 375 marks in
556 ^{Div} Grade Ist

SHE HAD PASSED THE FOLLOWING SUBJECTS:-


- | | | |
|---------------|---------------|-----------------|
| 1. English | 2. Urdu | 3. Pak. Studies |
| 4. <u>Bot</u> | 5. <u>200</u> | 6. <u>Geo</u> |

Her date of Birth according to the S.S.C is 12-08-1992

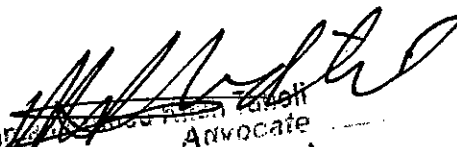
CHARACTER CERTIFICATE

Her conduct during her stay in this college was GOOD

Dated: 22-08-11


Principal,
Govt. Girls Degree College
No-2 Chini Chag (Mansehra)
PRINCIPAL
Govt. Girls Degree College No.2
Mansehra.

Attested .

Muham 
Advocate
Distt: Courts Abbottabad

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 640688

PROVISIONAL RESULT CARD

Name MEMBONA WAJID
 Father's Name WAJID
 Address VILLAGE AND PO BHERKUND

Roll No. AV632521
 Registration No. 13NMA02879
 Final Semester SPR-2014

Tehsil MANBEHRA
 District MANBEHRA.

has successfully completed BACHELOR OF EDUCATION (B. ED)

27

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 13	0512	PERSPECTIVES OF EDUCATION	100	55
AUT- 13	0513	SCHOOL ORGANIZATION	100	66
AUT- 13	0514	EVALUATION, GUIDANCE & RESEARCH	100	74
AUT- 13	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	60
AUT- 13	0651	ENGLISH (COMPULSORY)	100	70
AUT- 13	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	67
SPR- 14	0654	TEACHING OF ISLAMIC AT	100	66
SPR- 14	0655	WORKSHOP & TEACHING PRACTICE	100	79
SPR- 14	0658	TEACHING OF URDU	100	60

Attested

Muhammad Iqbal Tanoli
 Advocate
 Distt: Capital Area Islamabad

CREDITS: 6

Total Marks / Obtained

900 / 600

Result Declared on JANUARY 16, 2015

Percentage / Grade

67 B

Date of issue JANUARY 20, 2015

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



P-28

Annex C

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 **Qaria teachers (Female)** against vacant posts mentioned against each in **BPS-9 @ Rs.6200-380-17600 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 BUSHRA	FIDA HUSSAN	MANGLOOR	GGHS HASSA	AV/Post
2	SHAZIA	M AFZAL KHAN	BANDA GESUCH	GGHS JABORI	AV/Post
3	FATIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DOGA	AV/Post
4	FARHAT BIBI	M.HAMAYUN	DHODIAL	GGHS DYARYAL	AV/Post
5	MANAZZA	MOHD HAMYUN	TRANGRI BALA	GGHS MURAD PUR	AV/Post
6	MADHIA BIBI	ALI KHAN	AFZALABAD	GGHS AFZAL ABAD	AV/Post
7	BIBI SAEEDA SALAMA	FIDA HUSAIN	MANGLOOR	GGHS THATHI KHURD	AV/Post
8	ASMAT BIBI	ABDUL REHMAN	LASSAN NAWAB	GGHSS LASSAN NAWAB	AV/Post
9	BIBI MARIUM	FIDA HUSSAIN	MANGLOOR	GGHS PAIRAN	AV/Post
10	SAMMIYA RAHIEM	RAHIM SHAH	OGHI MANSEHRA	GGHS Oghi	AV/Post
11	SAIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DANDA KHOLIAN	AV/Post
12	ALYIA BIBI	ALI KHAN	AFZALABAD	GGHS SANGAR	AV/Post
13	AYSHA KANWAL	KHALIL UR REHMAN	LABARKOT	GGHS MAIRA AMJID ALI	AV/Post
14	AMBER ZEB	ALAM ZEB	PHULRA	GGHS PHULRA	AV/Post
15	AISHA BANO	SHAHZADA	M.M.POLE MANSEHRA	GGHSS BAFFA	AV/Post
16	BUSHRA BIBI ✓	LAL KHAN ✓	PHULRA ✓	GGHS SAWAN MAIRA ✓	AV/Post
17	MAMOONA WAJID ✓	WAHJID ✓	BHERKUND ✓	GGHS GHANOO ✓	AV/Post ✓
18	HAMEEDA	MOHD YOUSAF	PHULRA	GGHS JARED	AV/Post
19	TABSUM	MOHD NAZIR	OGHI MANSEHRA	GGHS TRAWRA	AV/Post
20	SABA NOOR	SHEIKH NOOR ELLAHI	MANSEHRA	GGHS TALHATA	AV/Post
21	ASMA NAZ	RAJA MANZOOR HUSSAIN	BEHALI	GGHS MOHAYIAN	AV/Post

Note: The pay of the candidates, falls at S# 1, 8, 16 & 20 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.

Handwritten signature
SUPERINTENDENT
 Deputy Dist. Officer (E & S)
 Edu:(Male) Mansehra.

Handwritten signature
Attested
Handwritten signature

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.
5. They will submit to this office, their all testimonial/Registration copy of their Madrasa (Institutions), 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 (a) receipt of verified documents by the appointing authority / (EDO E&SE Mansehra) (b) duly attested & verified registration copy of the concerned Dini Madrassa (Institutions), where he/she has obtained his/her Sanad/Certificate.
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 Mansehra.
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, their entitled for pension / gratuity etc.
13. No. TA/DA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No 893-942 /Estt: (F)Apptt: Qaria (F)/2012 Dated Mansehra the 16/6 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, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-26. Principal/Headmistresses School concerned.
27. PA to District Coordination Officer, Mansehra.
28. Budget & Accounts Officer, local office, Mansehra.
- 29-50. Candidates concerned.

Attested

EXECUTIVE DISTRICT OFFICER,
E&SE MANSEHRA

Muhammad Asghar Khan Tanoli
Advocate
Distt: Courts Abbottabad



P-30

Annex D

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7743 / DEO/ 2014

Email: dcofmanshra@yahoo.com

Dated: 29/9/ / 2014

Phone & Fax: 0997-302518

To:

Head Mistress
Govt. Girls High School

Subject:

Chamool

SHOW CAUSE NOTICE

Memo:

Show Cause notice in respect of Mst. Mamoonah Wajid Qaria D/O Wajid 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.

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.

Letter NO- 7743/Establishment
Dated 29/9/2014

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

Alerted

Muhammad Ahsan Khan Tanoli
Dist. Courts Abbottabad

32

D/O Ahmad Ali	GGHS Maira	Sanad Hifz ul Quran is from recognized institution but Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Eano	GGHS Baffa	The Sanad issued by Trust Jammat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment whereas the sanad e Hifz is not from recognized Institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi Khan	GGHS Sawan Maira	Application form and Sanad is not available on record.	The appointment is not valid and is against the recruitment rule/policy
Mamona D/O	GGHS Ghanool	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Sameeda D/O	GGHS Jared	Sanad Hifz ul Quran is from recognized institution, but no Sanad Tajweed is available with the form.	The appointment is not valid and is against the recruitment rule/policy
Tabssum D/O	GGHS Traura	Sanad Hifz ul Quran is from recognized institution but the Sanad issued by Trust Jammat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment and Qirrat sand not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Saba Noor D/O S.H Noor Elahi	GGHS Talhata	No relevant Sanad for appointment	The appointment is not valid and is against the recruitment rule/policy
Asma Naz D/O Raia Manzoor Hussain	GGHS Mohayian	Sanad Hifz ul Quran is from recognized institution but Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy

Only one candidate Amber Zeb D/O Alam Zeb was eligible as per her documents/ sanads

Amber Zeb D/O Alam Zeb	GGHS Phulra	Sanad Hifz ul Quran and Sanad Qirrat is from recognized institution.	Her appointment is valid as per recruitment policy.
------------------------	-------------	--	---

Amber Zeb

Advocate
 Ditch Courts

To

33


The District Education Officer (Female)
Mansehra.

Subject: SHOW CAUSE NOTICE.

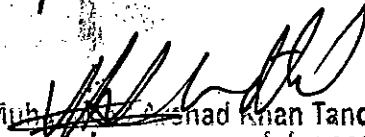
Kindly refer to your letter No. 7743/Estt./2014 dated 29-9-2014 on the subject noted above. My reply is as under please.

1. That I have properly applied for appointment as Qaria when the posts were advertised by the then EDO (E& SE) Mansehra.
2. That I have also qualified the test for the post applied through EATA under the laid down procedure at that time.
3. when the merit list was prepared by the Department my name was included at S.No.17 which can be seen from your office record.
4. That my appointment was made in the General Appointment order while the same was made on merit.
5. As regards the matter of sanad I have passed the Hifaz/Qirrat from Madrasa hadeeqatul Islam Abbottabad which is affiliated with Wafaqul Madaris Pakistan Multan (copy of the affiliation certificate is attached).
6. That I applied for appointment from my home and I have not fully aware from the official procedure/codal formalities due to which I am not in guilty towards the fake/bogus appointment.
7. that I am not ready to accept all allegation mentioned in your show cause notice.
8. That the enquiry/findings mentioned in para-1 of the show cause notice is not made against me but the same was made against the then EDO Mr.Umer Khan.
9. That in the result of enquiry/Finding the then EDO Mr: Umer Khan has been removed from the Govt: Service as mentioned in para -1 above.
10. That it is clear that the said EDO was in involved guilty & he has been punished by the Department.

It is humbly requested that my show cause notice may please be filed & I may please be given a chance to serve the Department as Qaria.


Mamoona Wajid
Qaria GGHS Nokot.

Attested


Mubashir Ashraf Khan Tanoli
Advocate
Distt: Courts Abbottabad



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Mamoonah Wajid D/O Wajid working as Govt GGHS/GGMS/GGPS Nalcot 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 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. Mamoonah Wajid D/O Wajid Govt GGHS/GGM/GGPS Nalcot.

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1706-15 /AE- J /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 Office, Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress [Name]
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mat: [Name]
10. Office File.

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Attested

[Signature]
Advocate
Distt: Courts Abbottabad

Muhammad Arshad Khan Tanoli
Advocate
Distt: Courts Abbottabad

To,

The Director (E&SE)
Peshawar.

Annex F

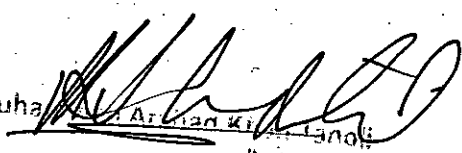
Subject: DEPARTMENTAL APPEAL/ REPRESENTATION.

1. Reference made to dismissal order Endst. NO. 1706-15/AE-J/Estab dated 03/03/2015. Copy attached.
2. That the applicant writes to submit as under:-
 - i. That as per advertisement appeared in the daily "The Aaj" dated 20/05/2011, the applicant submit her documents to ETEA authorities for ETEA test on 04/06/2011. Copy bank challan dated 04/06/2011 and advertisement dated 20/05/2011 is attached.
 - ii. That the applicant passed ETEA test and there after qualified interview for the post of Qaria.
 - iii. That EDO (E&SE) Mansehra issued appointment order of the applicant purely on the basis of merit vide order Endst. No. 893-942/Esst dated 16/06/2012 and the applicant was posted to Govt. Girls High School Ghanool against the vacant post of Qaria.

Attested

Muhammad Arshad Khan Tanoli
Advocate
Distt: Courts Abbottabad

- iv. That the applicant is eligible for the post of Qaria according to the recruitment policy and qualification prescribed for appointment for the said post.
- v. That thereafter, the applicant was transferred from GGHS Chanool to GGHS Nakot vide transfer order Endstt No. 453-56 dated 06/02/2013. (Copy of transfer order of the applicant is attached).
- vi. That the applicant is qualified Tajveed ul Quran and Hifz ul Quran and obtained Sanads/ certificates from the recognized institutions. (Copies of Sanads are attached).
- vii. That the applicant served in the Education Department from the date of appointment till the date of impugned dismissal order dated 03/03/2015 with complete devotion/ dedication and to the entire satisfaction of her superiors.
- viii. That DEO(F) Mansehra issued impugned dismissal order referred in Para No. 1 above which is malafide, against the law, perverse, and void and liable to be set aside on the following grounds:-

Attested

Muhammad Arshad Khan
4000000000
Distt: Courts Abbottabad

GROUNDS:

37

- a. That the applicant was recruited according to the prescribed rules as well as on merit on the basis of requisite qualification. Therefore, applicant is entitled to remain in Govt. service as Qaria.
- b. That District Education (Female) Mansehra dismissed the applicant but some similar employees have not been dismissed by her. Hence dismissal order of the applicant is discriminatory and same is not maintainable at law.
- c. That the DEO(F) (E&SE) Mansehra has made room to accommodate some blue eyed chaps who are in her good books.
- d. That impugned dismissal order is against the law and without lawful justification.
- e. That as per law, DEO(F) was supposed to issue statement of allegations, show case notice, and conduct proper inquiry but the requisite formalities have not been observed.

A. Hestab

Muhammad Anwar Tanoli
Advocate
Distt. Courts Abbottabad

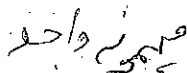
It is further added that the applicant was not afforded opportunities of personal hearing as well as Cross Examining the person who leveled allegations against her. Hence dismissal order is based on hypothesis, surmises and conjectures.


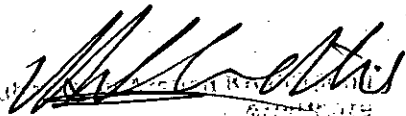
- f. That valuable rights to continuing service in Education Department have been accrued to the applicant and DEO(F) Mansehra dis not mention apointemtn order of the applicant and the impugned dismissal order. Hence impugned dismissal order is illegal and liable to be cancelled.
- g. That District Education Officer (F) being Inquiry Officer is not competent to issue dismissal order of the applicant as per law.

It is, therefore, prayed that on acceptance of instant departmental appeal, impugned dismissal order dated 03/03/2015 of the applicant may graciously be set aside.

Dated; 10/3 /2015

Your's sincerely


 (Memoona Wajid)
 Qaria GGHS High School
 Nakot



 Muz...
 ...

وکالت نامہ

بعدالت KPK سروس سرخپل پست در
 عنوان: محمد نور و اہل عاہم بنام گورنمنٹ KPK ایجوکیشن
 منجانب: اسد
 نوعیت مقدمہ: رجسٹرڈ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام
محمد اسد خان سول ایجوکیشن ڈیپارٹمنٹ
 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 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 بمراد استجارت نالش 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۔

بمقام: _____
 المرقوم: _____

Attested

M. Asad Khan Tanali
 Adv. High court

Mehvashin
 کے لئے

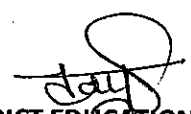
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 766/2015

Respectfully Shewth

1. That the services appeal No: 766/2015 in respect of MST: Mehmoona Wajid is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4230-35 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been conditionally reinstated against the post of Qaria (Notification attached).

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


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

ADD

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Memoona Wajid, Qaria at Government Girls High School Nokot District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1706-15 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 at S.No. 18 of the merit list. Both her asnad of Hifzul Quraan and sanad of Tajveedul quraan are from Jamia Hadeeqatul Islamia Lel Banat Abbot Abad. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.17.
2. Appeal may be accepted subject to condition that the madaris/ institution from where she acquired asnad (Qirat & Hifz ul Quran) for the post of Qaria must be affiliated with Wafaq ul Madaris in line with the Govt. of KPK E&SE Deptt. Letter No. SO(PE)5-12/ Darululoom Swat/ Chitral/ 10 dated 7/6/2012.

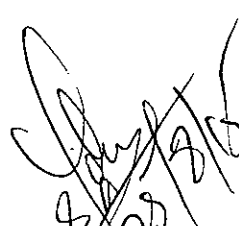
NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1706-15 dated 03/03/2015 and reinstate Ms. Memoona Wajid, Qaria, at Government Girls High School Nokot District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4230-25 /F.No. 11 /Appeals Female MSR Dated Peshawar the 25/6 /2015

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

1. District Education Officer (Female) Mansehra with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Memoona Wajid, Qaria and place on record under intimation to this office.
2. District Accounts Officer Mansehra
3. Principal, Concerned
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


Deputy Director (Female)
Directorate E&SE, KP
Peshawar