


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 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Dismissed as withdrawn.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

Appellant Deposited  
Security & Process Fee

Form- A  
FORM OF ORDER SHEET

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

Case No. 782/2015

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. Nadia Ashraf 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. 788/2015

Nadia Ashraf D/O Ashraf Baig (PST GGHS Cham Shamori Ghari  
Habibullah) 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"	12-25
4	Copy of appointment order and corrigendum	"C"	26-29
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	30
6	Copy of impugned dismissal order of appellant	"E"	31
7	Copy of departmental appeal /representation	"F"	32-34
8	Copy of merit list	"G"	35
9	Wakalatnama		

Dated: 7/1/2015

  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**

Advocate, High Court

Abbottabad

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

Appeal no. 789/15 ①

A.W.F. Province  
Service Tribunal  
Diary No. 810  
Dated 8-7-2015

Nadia Ashraf D/O Ashraf Baig (PST GGHS Cham Shamori Ghari  
Habibullah) 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**

Filed to-day  
8/7/15

Respectfully Sheweth,

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

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

2

2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, F.A/F Sc PTC with extra qualification. Copies of Documents/testimonial are annexed as Annexure "B"
3. That, following this, the appellant was appointed as PST Teacher in respondents' Department on the basis of merits and was posted in GGPS Danna Jamila vide appointment order endrst No 5360-5384/ ESTb PST (F) APPTT; (f) 2011/2012 Mansehra Dated 18 May 2012. Copy of appointment order and 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. 18 May 2012 onwards.
5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 1846-55/AE /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 and DEO, Shamim Akhtar was found attached with the show cause notice, wherein it was mentioned against the name of appellant that "that

3

appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes as against the recruitment rules". Copy of Show cause notice annexed as Annexure "D". AS the inquiry committee did not 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 PST Teacher and appeared in ETTA 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 requisite qualification from recognized Institution to be appointed "as per service structure in prescribe rules the requisite qualification against the vacant post of PST Teacher is taken into consideration and thereafter appointment made on merit.
8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1846-55/AE./Estb dated 3.3.2015. Copy of

4

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 9.03.2015. 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 PST being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed on 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.
- b. That, as per educational record annexed with the appeal, the appellant has been appointed as PST according to the laid down procedure and criteria

5

mentioned in the advertisement published by respondent 3. It is further submitted that there were vacant post of PST in the Union Council of the appellant but respondent No 3 did not appoint the appellant in her Union Council. However later on she was to be posted in her own Union Council. It is worth mentioning that there was no contesting candidate in the Union Council where the appellant was appointed as per law and procedure mentioned in the advertisement.

- 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 PST. But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- d. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore, respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in



6

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

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

7

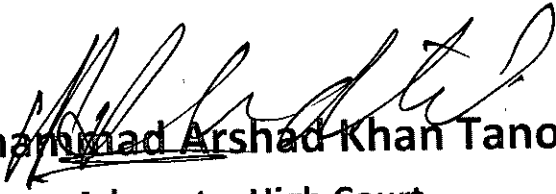
- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation.

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 1846-55/AE./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: 7/7-2015

  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

8

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

Nadia Ashraf D/O Ashraf Baig (PST GGHS Cham Shamori Ghari  
Habibullah) 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 <sup>8</sup>-<sup>3</sup> 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) Mansehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued
3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the

9

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

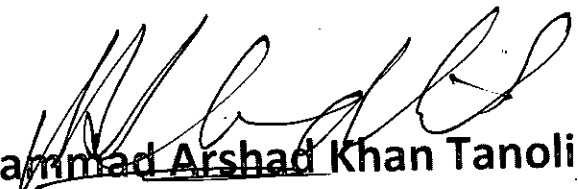
5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

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

Dated: 7/7/2015

  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

10

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

Nadia Ashraf D/O Ashraf Baig (PST GGHS Cham Shamori Ghari  
Habibullah) 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, Nadia Ashraf D/O Ashraf Baig (PST GGHS Cham Shamori Ghari  
Habibullah) 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



Amer B<sub>2</sub>

P-12



# HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN SNo: 4690

## DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL) ANNUAL 2008

Roll No: 18330 Registration No: 07-P-811  
 Student's Name: Naida Ashraf Father's Name: Mohammad Ashraf Beg  
 Institution/District: Mansehra Subject: Islamiyat

Course Title	Total Marks	Marks Obtained	Marks In Words	Remarks
MA Previous Marks	500	322	Three Hundred & Twenty-Two	Pass
(VI) (Al-Qura'an) Translation 2nd Half & Commentary alongwith Grammar	100	68	Sixty-Eight	Pass
(VII) Principles of Islamic Jurisprudence	100	48	Forty-Eight	Pass
(VIII) Islam & other World Religions	100	61	Sixty-One	Pass
(IX) Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100	63	Sixty-Three	Pass
(X) Islamic Economics / Islamic Politics / Islam & Science	100	51	Fifty-One	Pass
General Viva.Voce	100	42	Forty-Two	Pass
<b>Total</b>	<b>1100</b>	<b>655</b>		
<b>Percentage</b>	<b>59.55</b>			
<b>Division</b>	<b>Second</b>			

Checked by:

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

Controller Examinations  
Hazara University, Mansehra  
January 29, 2009

*Attested*  
*Muhammad Asad Khan*  
 District: Courts Address

Serial No. 003463

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 07-P-811

Roll No. 18330

Annex "B"

# HAZARA UNIVERSITY

Mansehra, Pakistan



P-13

Muhammad Ashraf Khan  
Advocate  
Distt: Courts Abbotabad

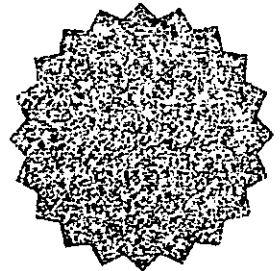
The University in recognition of the fulfilment of prescribed requirements has conferred upon  
Mr / Ms Naida Ashraf Son / Daughter of Mohammad Ashraf Beg

The Degree of **MASTER OF ARTS** in Islamiyat

in the examination held in August 2008 session Annual 2008 (Private)

He / She was placed in Second Division / Grade / CGPA.

The examination was taken as a Whole.



[Signature]  
Controller of Examinations  
Date 29-Jan-2009

[Signature]  
Vice Chancellor

[Signature]  
Registrar



P-14



# HAZARA UNIVERSITY

SNo: 3810

MANSEHRA, NWFP, PAKISTAN

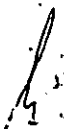
## DETAILED MARKS CERTIFICATE

MASTER OF ARTS, (PREVIOUS) ANNUAL 2008


Roll No: 09061 Registration No: 07-P-811  
Student's Name: Naida Ashraf Father's Name: Mohammad Ashraf Beg  
Institution/District: Manshara Subject: Islamiyat

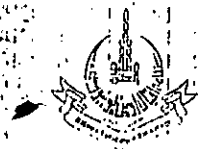
Course Title	Total Marks	Marks Obtained	Marks In Words	Remarks
(I) (Al-Qura'an) Translation 1st Half Commentator & Principles of Tafseer	100	54	Fifty-Four	Pass
(II) Hadith and Principles of Hadith	100	72	Seventy-Two	Pass
(III) Islamic Jurisprudence (Text)	100	66	Sixty-Six	Pass
(IV) Seer'at un Nabi (SAWS) & History of Islam	100	51	Fifty-One	Pass
(V) Arabic Grammar and Literature	100	79	Seventy-Nine	Pass

Total 500 322  
Percentage 64.40 %

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

Controller Examinations  
Hazara University, Manshara  
January 29, 2009

  
Muhammad Anwar Khan Tareen  
Dist: Court Abbottabad



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
RESULT INTIMATION CARD

Serial No. 730  
Registration No. 99NMA0005  
Roll No. L473238

P-15

Certified that Mr/Ms. NAIDA ASHRAF  
Father's Name MUHAMMAD ASHRAF  
has Successfully Completed the BACHELOR OF ARTS  
programme. The detail of course is as under  
Address:- C/O MUBARAK AHMAD LUGHWANI ADOCCATE BALAKOT, BALAKOT DIST. MANSEHRA

Semester	Course Code	Title of the Course	Marks	
			Maximum	Obtained
SPR-02	0416	ISLAMIAT (C)	100	54
SPR-02	0417	PAKISTAN STUDIES(C)	100	57
AUT-02	0419	EDUCATION	100	68
SPR-02	0435	FUNCTIONAL ENGLISH	100	52
AUT-02	0436	SEERAT-E-TAYYBA	100	56
AUT-03	0407	HISTORY OF MODERN MUSLIM WORLD	100	71
SPR-03	0464	ISLAMIC FIQHA	100	68
AUT-03	0484	FOOD & NUTRITION	100	62
SPR-03	0451	PUBLIC RELATION	100	59
SPR-03	0452	MASS COMMUNICATION	100	49
AUT-03	0485	HEALTH & NUTRITION	100	70

Total Credit Hours \*\*  
Total AiOU Credits 8  
Result declared on September 16, 2004  
Date of Issue: September 20, 2004

Total Marks Obtained 1100 666  
Percentage Marks  
CGPA \*\*

Signature  
Controller of Examinations

Note: This result card is issued as a notice only; errors and omissions are excepted. An entry appearing in it does not in itself confer any right or privilege independently to the grant of proper certificate/degree which will be issued under the Regulations in due course of time.

Signature  
Muhammad Arshad Khan Tanoli  
Advocate  
Dist: Courts Abbottabad

P-16

# Allama Iqbal Open University Islamabad



Serial No. 60543

Certified that Mr. / Ms. NAIDA ASHRAF

Son / Daughter of MUHAMMAD ASHRAF BEG

Registration No: 99-NMA-0005 Roll No: L-473238

having completed the prescribed requirements in semester  
AUTUMN 2003 is awarded the degree of:

## Bachelor of Arts

He / She has secured 61 % marks and has been placed in B grade.

*[Signature]*

CONTROLLER OF EXAMINATIONS

*[Signature]*

Result declared on: September 16, 2004



*[Signature]*

VICE-CHANCELLOR

ISLAMABAD. DATED: June 29, 2006

*[Signature]*

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

*[Signature]*

Muhammad Iqbal Khan Tanoli

Dist: Courts Islamabad

Serial No.  
56500

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD



Name NAIDA ASHRAF  
Fathers's Name MUHAMMAD ASHRAF  
Address C/O MUBARAK AHMAD LUGHWANI  
ADOCATE BALAKOT

Roll No 5629400  
Registration No 99NMA00005  
Final Semester SPR- 2006

P-17

Tehsil BALAKOT  
District MANSEHRA  
has successfully completed CERTIFICATE OF TEACHING

Programme.

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 05	0631	DIMENSIONS IN EDUCATION	100	51
AUT- 05	0632	EDUCATIONAL PSYCHOLOGY	100	47
AUT- 05	0633	SCHOOL ORGANIZATION	100	57
AUT- 05	0638	TEACHING STRATEGIES & EVALUATION	100	43
SPR- 06	0604	URDU LANGUAGE AND ITS TEACHING	100	68
SPR- 06	0605	SOCIAL STUDIES & ITS TEACHING	100	68
SPR- 06	0606	HOME ECONOMICS & ITS TEACHING	100	66
SPR- 06	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	58
SPR- 06	0634	ENGLISH AND ITS TEACHING	100	62

CREDITS: 5

Total Marks / Obtained 900 / 524

Result Declared on MARCH 20, 2007

Percentage / Grade 58 D

Date of issue MARCH 24, 2007

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.

Controller of Examinations

*Muhammas Ashraf Khan Tanvir*  
Advocate  
Distt: Courts Abbottabad

P-18

آزاد جموں و کشمیر انٹرمیڈیٹ و ثانوی تعلیمی بورڈ میرپور

تفصیلی نتیجہ لامہ امتحان بی ٹی سی ارائے ریگولر امیدواران سال 1999

رول نمبر 2713	نام امیدوار / امیدوارہ محمد اشرف	میرل نمبر 2713
	ولدیت محمد اشرف بیگ	
	ادارہ ریس الاوانز لالچانفلسٹری میرپور	
	رجسٹریشن نمبر 13P 11998	

حاصل کردہ نمبر		کل نمبر		مضامین	
میزان	خارجی تخمین	میزان	داخلی تخمین		
64		100	25	75	اصول تعلیم
72		100	25	75	نظم و نسق مدرسہ و تنظیم جماعت
36		50	12	38	اسلامیات و طریقہائے تدریس
49		100	25	75	بچے کی نشو و نما
74		100	25	75	سماجرتی علوم و طریقہائے تدریس
58		100	25	75	سائنسی و طریقہائے تدریس
58		100	25	75	ریاضی و طریقہائے تدریس
74		100	25	75	اردو و طریقہائے تدریس
75		100	25	75	عملی فنون و طریقہائے تدریس
5,8		100	25	7	صحت و تعلیم جسمانی
39+5		100	25	75	بطانہ پاکستان
30		50	12	38	ناظرہ قرآن مجید
174		200	140	60	عملی تدریس
86+5		1300	414	886	کل میزان

1 امیدوار / امیدوارہ اول شدہ مضامین میں سال 2000 تک شامل امتحان ہو سکتا/سکتی ہے  
 2 امیدوار / امیدوارہ اول ہو چکا/چکی ہے اور آئندہ دورے مضامین میں شامل امتحان ہوگا/گی  
 3 اس نتیجہ نامہ میں غلطی ہو سکتی ہے۔ اسے سنہ تصور نہ کیا جائے

کنٹرولر امتحانات (مگولڈ)

پڑتال کنندہ

نڈار کنندہ

12.10.1999  
تاریخ اجراء

15-7-2000

Attested  
 Muharib Khan  
 Distt. Courts Abbottabad

P-19

No. R.A.C.P.C.

Roll No. 2713



**MUZAFFARABAD**  
**Azad Jammu & Kashmir**

**PROVISIONAL CERTIFICATE**

Class PTC Session 1998-99 Annual / Supplementary.

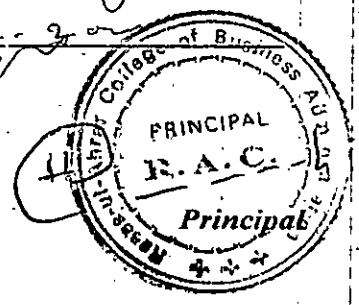
This is to Certify that Mr./Ms./Miss. Naida Ashraf  
 SIO.D10 of M. Ashraf Baig was a candidate of Raees-ul-Ahrrar  
 College of Education and passed the P.T.C. Examination of the University/  
 Board as a regular/Ex College Candidate. He/She has obtained 861<sup>+5</sup>  
 marks out of 1300 and has been placed in grade A.  
 This Examination has taken as a Annual/Term 1999

PREPARED BY [Signature] HE/SHE APPEARED HELD IN August 98

CHECKED BY [Signature] DATE OF ISSUE 21.8.98

[Signature]  
Adman

[Signature]  
Executive Director



[Signature]  
 Advocate  
 Dist. Courts Muzaaffarabad

P-20

Serial No. 28138

# Allama Iqbal Open University Islamabad



## DUPLICATE

Certified that Mr/Ms Naida Ashraf  
Son/Daughter of Muhammad Ashraf Beg  
Registration No. 99-NMA-0005 Roll No. H-3869131 having  
completed the prescribed requirements in Autumn 2000 Semester, is awarded

## Higher Secondary School Certificate (General Group)

Detail of courses is as under:

Course Code	Title of the Course	% Marks Obtained	Grade
302/318	Urdu/Sindhi Easy Urdu	51	C
310	Functional English	50	C
316/319	Islamiat/Ethics (For Non-Muslims)	67	B
317	Pakistan Studies	52	C
330	Child Care & Development	48	C
345	Home Management & Furnishing	64	B
328	Cultivation of Oil Seed Crops	54	C
349	Plant Protection	66	B
343	Islamiat (E)	49	C
312	Education	61	B
308	General Science	63	B

Muhammad Ashraf Khan Tandi  
Distt. Controller of Examinations  
Islamabad

Result declared on: September 15, 2003 Obtained/Total Marks: 625/1100

He/she has secured 57 % marks and has been placed in grade B.

Islamabad, dated: October 1, 2003

Prepared by: \_\_\_\_\_  
Checked by: \_\_\_\_\_

*Faizal*  
Controller of Examinations

Note: This certificate is issued without alterations/erasure.



ALLAMA IQBAL OPEN UNIVERSITY ISLAMABAD  
(CERTIFICATE SECTION)

No. AIQU/Cert/01/1-5

Dated: 01/10/2003.

NOTIFICATION

It is notified for the information of all the concerned that the following Certificates of F.A Program have been cancelled on account of misplacement by the students.

The possession of cancelled Certificates will liable to prosecute under the law. The detail is as under:-

SR.N O	NAME/FATHER NAME OF STUDENT	REGISTRATION NO./ PROGRAM	REMARKS
01	BUSEER JAFAR D/O JAFAR HUSSAIN	97 PLE 1901 F.A GENERAL GROUP	Certificate No. 15834 cancelled and Duplicate certificate No. 28117 issued
02	NAIDA ASHRAF D/O MUHAMMAD ASHRAF BAIG	99 NMA 0005 F.A GENERAL GROUP	Certificate No. 19515 cancelled and Duplicate Certificate No. 28118 Issued.

(MUHAMMAD SALEEM)  
Assistant Controller of Exams

Copy to:

- 01 Director Education, Lahore.
- 02 District Education Officer, Mansehra.
- 03 Director Education, Peshawar.
- 04 Person Concerned.
- 05 Office File.

Muhammad Arshad Khan Tanoli  
Advocate  
Distt: Courts Abbottabad



f-22

GOVT: GIRLS HIGH SCHOOL  
GARHI HABIBULLAH  
SESSION 1998

This is to Certify that Miss NAIDA ASHRAF  
D/O MOHAMMAD ASHRAF BGL was is a bonafide student of  
Govt:Girls High School Garhi Habibullah.

I am/was fully satisfied with his work behaviour and conduct  
during his stay in the School.

Prepared by. [Signature]

Checked by \_\_\_\_\_

Date of issue 26.8.1998

[Signature]  
HEADMISTRESS  
GOVT: GIRLS HIGH SCHOOL  
GARHI HABIBULLAH (MANSEHRA)  
Dist. Mansehra


[Signature]  
With  
1998

ADA 0042017

Roll No. 4462

P-23

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Abbottabad N.W.F.P. Pakistan**  
**Secondary School Certificate Examination**  
 SESSION ANNUAL 1998

THIS IS TO CERTIFY THAT NAIDA ASHRAF

Son/Daughter of MUHAMMAD ASHRAF BEG  
and a student of GOVT GIRLS HIGH SCHOOL GARHI HABIBULLAH

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 1998.

as a *Regular/Private candidate*. He/She obtained 496 Marks out of 850  
and has been placed in Grade C Representing GOOD


The Candidate passed in the following subjects.

- |            |                     |              |            |
|------------|---------------------|--------------|------------|
| 1. English | 3. Islamiyat        | 5. MATHS.    | 7. PHYSICS |
| 2. Urdu    | 4. Pakistan Studies | 6. CHEMISTRY | 8. BIOLOGY |

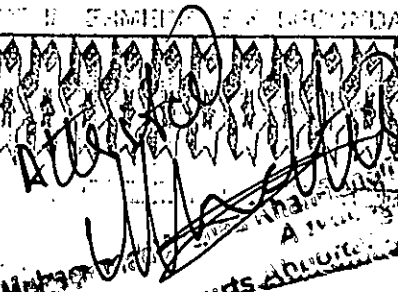
He/She has been awarded Grade C on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is TWENTY EIGHTH AUGUST  
one thousand nine hundred and SEVENTY NINE (28-08-1979)

  
Asst. Secretary

  
Secretary

This certificate is issued without alteration or erasure.

  
Director  
A 11/11/98  
Govt. Courts Abbottabad

# DOMICILE CERTIFICATE

P-24

I declare that I am born of parents who are permanently domiciled in N.W.F.P. Province having been born in this Province.

I was born at Katha Dobandi Tehsil Balakot  
 District Manshehra  
 I passed Primary Examination from G.P.S. school GARHI HABIBULLAH  
 Resident of Katha Dobandi  
 Tehsil Balakot  
 District Manshehra  
 Sd/- [Signature] Dated [Date]  
 Pursuance to the declaration dated [Date]

Filed by Nohide Ashraf  
 S/O Nohide Ashraf  
 Tribe Mughal Section [Blank] Sub Section [Blank]  
 of Katha Dobandi Tehsil Balakot District Manshehra  
 to the effect that he had been born of parents who are permanently domiciled in N.W.F.P. Province having been born within it.

I have satisfied myself from personal/my own knowledge the above declaration is true and certify accordingly.

*Verification over here*

Given under my hand and seal of this Court

15th day of September 1998

*Attest*

*[Signature]*

*[Signature]*  
 Assistant District Officer  
 (M) Primary Circle,  
 Kaghan.

MAGISTRATE 1ST CLASS. *[Signature]*  
 Assistant Commissioner  
 Balakot

Countersigned  
 DISTRICT MAGISTRATE

5201 10/9/98  
 COUNTER SIGNED  
*[Signature]*  
 District Magistrate  
 Manshehra

Certified that Nahida Ashraf D/o  
Mohd Ashraf has passed the 5th class  
examination in g-e school Garhi Hassan

*[Signature]*  
Head Mistress  
Govt. Girls Primary School  
Ghani Habibullah

۲۵

حضرت عالی  
تقدیر کیا جاوے کہ رضیہ ناسیرہ ازف دختر محترمہ اشرف قوم مغل ساکن کھدہ دوسری دھکی لڑکی  
مدرسہ ماہر کوٹ ضلع ماہرہ صوبہ سرحد کی آباد احمدیہ پیدائشی و سکونت ہے  
والد اسمعیل محمد اشرف ولد سعید احمد صاحب زمین موضع گڑھی صاحب کسٹم صاحب  
سال ۱۹۸۷ء کے کھانہ نمبر ۱۷۵ میں ماہانہ مال ۲۲۲ روپے فی ماہ لکھ کر  
۸۸

*[Signature]*  
31/8/96

Muhammad Arshad Khan Tandon  
Advocate  
Distt. Courts, Abbottabad

ATTESTED

*[Signature]*  
31/8/96

Annex "C" 26

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

Consequent upon the recommendation of the Departmental Selection Committee, District Manshara, the competent authority is pleased to appoint the following candidates as a Primary School Teacher PST (Female) against newly created / resultant vacated posts in their relevant union councils in BPS 7 @ Rs.5800-320-15400 plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect.

U/C BAFFA				
S#	Name of Candidate	Father's Name	Home Address/ Domiciled U/C	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	Own UC M/List
2	Sabia	Noor Hussain	Baffa	Own UC M/List
U/C BEHALI				
3	Munaza Daud	Daud	Behali	Own UC M/List
4	Nazma Bibi	R.Khan Bahdar	Behali	Own UC M/List
U/C Battal				
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	Own UC M/List
6	Shaista Jabeen	Muhammad Akbar	Kathai	From Adjacent UCs Merit list
U/C Bhokund				
7	Gushra	Ghulam Mustafa	Bhokund	Own UC M/List
U/C Gari Habib Ullah				
8	Naida Ashraf	Muhammad Ashraf Bag	Gari Habib Ullah	Own UC M/List
9	Gul Naz Bibi	S. Qabul Shah	Gari Habib Ullah	Own UC M/List
U/C Hilkot				
10	Bibi Asia	Abdul Ghafoor	Hilkot	Own UC M/List
U/C Hangrai				
11	Irum Saeed	Saeed Akhtar	Hangrai	Own UC M/List
12	Marium Bibi	Muhammad Younis	Hangrai	Own UC M/List
U/C Ichrian				
13	Bibi Tajida	Saeed ur Rehman	Ichrian	Own UC M/List
14	Saima Aza	M. Farzeed Khan	Ichrian	Own UC M/List
U/C Jabar Daveli				
15	Mali Jabeen	Muhammad Farooq	Jabar Daveli	Own UC M/List
16	Saba Tariq	Muhammad Tariq	Sachan	From Adjacent UCs Merit list
U/C Jaloo				
17	Sobia Bibi	Abdul Ghafoor	Jaloo	Own UC M/List
18	Saima Naz	Mir Aizal	Jaloo	Own UC M/List
U/C Karnol				
19	Fara Naz	Muhammad Khurshid	Karnol	Own UC M/List
20	Nadia Rehman	Habib ur Rehman	Pairan	From Adjacent UCs Merit list
U/C Karori				
21	Amrin Younis	Muhammad Younis	Karori	Own UC M/List
22	Musrat Bibi	Khalil ur Rehman	Karori	Own UC M/List
23	Zenab	Alam Zeb	Karori	Own UC M/List
24	Amrin Kusar	Muhammad Miskeen	Karori	Own UC M/List
25	Rukhsana Taj	Taj Muhammad	Karori	Own UC M/List
26	Rifat Bibi	Faqeer Muhammad	Shanaya	From Adjacent UCs Merit list
27	Ashiya	Misri Khan	Shanaya	From Adjacent UCs Merit list
28	Razia Bibi	Muhammad Zaman	Darband	From Adjacent UCs Merit list

Retrieved

Advocate  
Muhammad Khalid Khan

Manshara

P-27

U/C Lissan Nawab				
30	Sobia Arshad	Muhammad Arshad	Lissan Nawab	Own UC M/List
	Rushida Bibi	M.Zahoor	Lissan Nawab	Own UC M/List
U/C Mohandari				
31	Bibi Naseema	Ghulam Nabi	Mohandari	Own UC-M/List
U/C Nika Pani				
32	Yasmeen Wahab	Abdul Wahab	Nika Pani	Own UC M/List
33	Neelam	Abdul Latif	Darband	From Adjacent UCs Merit list
U/C Perhinna				
34	Lubna Younis	M.Younis	Perhinna	Own UC M/List
35	Zahida Bano	Ali Zaman	Perhinna	Own UC M/List
U/C Phulra				
36	Bibi Saleha	Abdula Jan	Phulra	Own UC M/List
37	Mehnaz Bibi	M.Iqbal	Phulra	Own UC M/List
38	Bibi Mewash	M.Naveed	Phulra	Own UC M/List
39	Farzana Yousaf	M.Yousaf	Phulra	Own UC M/List
40	Bibi Farah	Khurshid Khan	Sawan Maira	From Adjacent UCs Merit list
U/C Sachan Kalan				
41	Bibi Salama	Shezada Khesro Faredon	Sachan Kalan	Own UC M/List
42	Bibi Norin	Rehmat Ullah	Sachan Kalan	Own UC M/List
U/C Sawan Maira				
43	Tahira Jabeen	Muhammad Ayub	Sawan Maira	Own UC M/List
U/C Shanaya				
44	Safoora Parat	Abdul Razaq	Shanaya	Own UC M/List
45	Irum Shaheen	Anwar Khan	Shanaya	Own UC M/List
U/C Shergarh				
46	Saeeda Haidar	Mir Haidar	Shergarh	Own UC M/List
47	Fozia Bibi	Sher Bahadar	Shergarh	Own UC M/List
48	Sadia Gul	M.Zaman	Shergarh	From Adjacent UCs Merit list
49	Asma	Abdul Malik	Darband	From Adjacent UCs Merit list
U/C Shuakat Abad				
50	Sadia Javed	Javed Khan	Shuakat Abad	Own UC M/List
51	Sabeen	M.Haroon	Shuakat Abad	Own UC M/List
52	Falguni Rashid	Abdul Rashid	Shuakat Abad	Own UC M/List
U/C Trangri Sabir Shah				
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	Own UC M/List
54	Khalida Bibi	M.Yousaf Khan	Trangri Sabir Shah	Own UC M/List
55	Sidra Hamayun	M.Hamayun	Trangri Sabir Shah	Own UC M/List
U/C Bandi Shungli				
56	Salma Javed	Muhammad Javed	Darband	From Adjacent UCs Merit list
57	Nosheen Bibi	Fazal ur Rehman	Darband	From Adjacent UCs Merit list
U/C Tanda				
58	Sahibzada Hazmat Rabani	Ghulam Rabani	Tanda	From Adjacent UCs Merit list
59	Asma Noreen	Nawab Khan	Dhodial	From Adjacent UCs Merit list

**ADJUSTMENT ORDER**

Consequent upon the above, the following adjustment are hereby ordered against the posts mentioned against each.

S#	Name	Father's Name	Home Address/ Domiciled U/C	Place of Posting	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	GGPS Baffa Khurd	A/V/Post
2	Sabia	Noor Hussain	Baffa	GGPS Kando Gali	A/V/Post
3	Munaza Daud	Daud	Behali	GGPS Ashwal	A/V/Post
4	Nazma Bibi	R.Khan Bahdar	Behali	GGPS Jamal Nakka	A/V/Post
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	GGPS Karmang	A/V/Post
6	Shahista Jabeen	Muhammad Akbar	Kathai	GGPS Chandni	A/V/Post

*Attested*

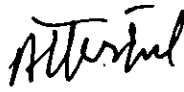
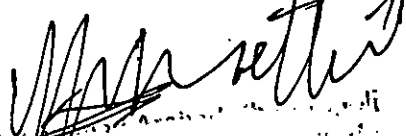
*Muhammad Arshad Khan Tanoli*  
Dist: COUPE - Multan

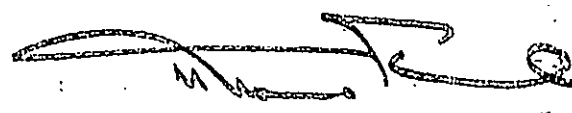
*[Signature]*

	Bushra	Ghulam Mustafa	Bhekund	GGPS Kehian Mian	A/V/I Post
	Naida Ashraf	Muhammad Ashraf Bag	Gari Habib Ullah	GGPS Danna Ganaila	A/V/I Post
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	GGPS Chuntri	A/V/I Post
10	Bibi Asia	Abdul Ghafoor	Hilkot	GGPS Khan Balimang	A/V/I Post
11	Irum Saeed	Saeed Akhtar	Hangrai	GGPS Kalas Ghanaila	A/V/I Post
12	Marium Bibi	Muhammad Younis	Hangrai	GGPS Kalas Ghanaila	A/V/I Post
13	Bibi Sajida	Saeed ur Rehman	Ichrian	GGPS Karmang Payceer	A/V/I Post
14	Saima Ara	M. Farced Khan	Ichrian	GGPS Ramsera	A/V/I Post
15	Mah Jabeen	Muhammad Farooq	Jabar Daveli	GGPS Baso Manda Gueha	A/V/I Post
16	Saba Tariq	Muhammad Tariq	Sachan	GGPS Baso Manda Gueha	A/V/I Post
17	Sobia Bibi	Abdul Ghafoor	Jaloo	GGPS Talian Di Kasi	A/V/I Post
18	Saima Naz	Mir Afzal	Jaloo	GGPS Chor Banda	A/V/I Post
19	Fara Naz	Muhammad Khurshid	Karnol	GGPS Dhoraj	A/V/I Post
20	Nadia Rehman	Habib ur Rehman	Palran	GGPS Dheri Solmi	A/V/I Post
21	Amrin Younis	Muhammad Younis	Karori	GGPS Seri Malwal	A/V/I Post
22	Musrat Bibi	Khalil ur Rehman	Karori	GGPS Malhar	A/V/I Post
23	Zenab	Alan Zeb	Karori	GGPS Malhar	A/V/I Post
24	Amrin Kuran	Muhammad Miskren	Karori	GGPS Fata Bandl	A/V/I Post
25	Rukhsana Taj	Taj Muhammad	Karori	GGPS Fata Bandl	A/V/I Post
26	Rifat Bibi	Faqeer Muhammad	Shanaya	GGPS Naryala	A/V/I Post
27	Asliha	Misri Khan	Shanaya	GGPS Thaken	A/V/I Post
28	Razia Bibi	Muhammad Zaman	Darband	GGPS Dhok	A/V/I Post
29	Sobin Arshad	Muhammad Arshad	Lassan Nawab	GGPS Sharota	A/V/I Post
30	Rashida Bibi	M. Zahoon	Lassan Nawab	GGPS Chajra Hala	A/V/I Post
31	Bibi Nuseema	Ghulam Nubi	Mohandari	GGPS Dardal Gram	A/V/I Post
32	Yasmeen Wahab	Abdul Wahab	Nika Puni	GGPS Cham	A/V/I Post
33	Neelam	Abdul Latif	Darband	GGPS Cham	A/V/I Post
34	Lubna Younis	M. Younis	Perhanna	GGPS Phalkot	A/V/I Post
35	Zahida Bano	Ali Zaman	Perhanna	GGPS Phalkot	A/V/I Post
36	Bibi Saleha	Abdula Jan	Phulra	GGPS Ghazikot	A/V/I Post
37	Mehnaz Bibi	M. Iqbal	Phulra	GGPS Dhamnu	A/V/I Post
38	Bibi Mewash	M. Naveed	Phulra	GGPS Ghazikot	A/V/I Post
39	Farzana Yousaf	M. Yousaf	Phulra	GGPS Batangi	A/V/I Post
40	Bibi Farah	Khurshid Khan	Sawan Maira	GGPS Gojar Gali	A/V/I Post
41	Bibi Salama	Shezada Khesro Faredun	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/I Post
42	Bibi Norin	Rehmat Ullah	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/I Post
43	Tahira Jabeen	Muhammad Ayub	Sawan Maira	GGPS Mohar	A/V/I Post
44	Safoora Farat	Abdul Razaq	Shanaya	GGPS Numshera Shahkot	A/V/I Post
45	Irum Shabeen	Anwar Khan	Shanaya	GGPS Numshera Shahkot	A/V/I Post
46	Saeeda Haidar	Mir Haidar	Shergarh	GGPS Gakharh	A/V/I Post
47	Fozia Bibi	Sher Bahadar	Shergarh	GGPS Perchaian	A/V/I Post
48	Sadia Gul	M. Zaman	Shergarh	GGPS Perchaian	A/V/I Post
49	Asma	Abdul Malik	Darband	GGPS Shorolian	A/V/I Post
50	Sadia Javed	Javed Khan	Shuakat Abad	GGPS Lalan Da Darra	A/V/I Post
51	Sabeen	M. Haroon	Shuakat Abad	GGPS Chajar Bala	A/V/I Post
52	Tahaseen Rashid	Abdul Rashid	Shuakat Abad	GGPS Paniyuli	A/V/I Post
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/I Post
54	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/I Post
55	Sidra Hamayun	M. Hamayun	Trangri Sabir Shah	GGPS Khatri Paloi	A/V/I Post
56	Salma Javed	Muhammad Javed	Darband	GGPS Pagora	A/V/I Post
57	Noshin Bibi	Fazal ur Rehman	Darband	GGPS Beer Bat	A/V/I Post
58	Sahibzadi Azmat Rebani	Ghulam Rabani	Tanda	GGPS Talian Manda Gueha	A/V/I Post
59	Asma Noreen	Nawab Khan	Dhodial	GGPS Kohri	A/V/I Post

**TERMS & CONDITIONS:**

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.

*Attested*  
  




P-29

- 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.
  5. They will submit to this office, their all testimonial and domicile/ UC Certificate from the secretary concerned union councils 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 P&SE Manshara).
  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 termination 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 unsatisfactory; 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 Manshara.
  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 1<sup>st</sup> 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. 5360-5384 /Estt: (F)Apptt:PET(F)/2011-12 Dated Manshara the 18<sup>th</sup> May, 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, Manshara.
- 4-5. District Officer (M&F) Local Office.
6. Deputy District Officer (Female) E&SE Manshara.
7. PA to District Coordination Officer, Manshara.
8. Budget & Accounts Officer, local office, Manshara.
- 9-67. Candidates concerned.

*Arshad*  
*Arshad*  
Arshad Arshad Khan  
Dist. Courts, Manshara

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



Annex "D"

P-30



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSHERA

No. / / S. Cause  
Dated the / / 2014

Email: deofmanshra@yahoo.com  
Phone & Fax: 0997-302518

SHOW CAUSE NOTICE

I, Nughmana Sardar, District Education Officer (Female) Manshara as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Nadia Ashraf PST GGPS Dannah Ganila Manshara Show cause Notice as follows:

- 1) You were illegally appointed as PST at GGPS Dannah Ganila, vide defunct Executive District Officer (E&SE) Manshara at S. No. 8, out of your own U/C, 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 SOE/AME&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) Inflicted huge financial losses to the Govt Treasury receiving pay as result of bogus appointment.
- c) By spatching established rights of the deserving candidates due for appointment on merit. Cheating/evading the facts for unlawful appointment with collusion 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 rule.
- 4) You are hereby, 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-parte action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

*[Signature]*

COMPETENT AUTHORITY

Mst. Nadia Ashraf  
GGPS Dannah Ganila

*[Signature]*  
*[Signature]*

Muhamina Ashad Khan Tanoli  
Distt: Courts

Annex<sup>ce</sup> E.



P-31

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Naida Ashraf D/O Muhammad Ashraf Beg working as PST GCHS/GCMS/GGP Dannah Gamila 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: Naida Ashraf D/O Muhammad Ashraf Beg PST GCHS/GGM GGP Dannah Gamila

*[Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Endst: No. 1846-55/AE-\_\_\_/Estab: dated 03/03/15/2015.

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 \_\_\_\_\_
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: \_\_\_\_\_
10. Office File.

*[Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

*[Signature]*  
Muhammad...  
Distt. Mansehra  
Abdullahabad

بخدمت جناب ڈائریکٹر صاحب محکمہ تعلیم صوبہ خیبر پختونخواہ پشاور

دورہ

مضمون: محکمانہ اپیل

(1) - یہ کہ سائلہ کھٹہ دو بندی یونین کونسل گڑھی حبیب اللہ کی رہائشی و بیداشی ہے۔  
(نقل ڈومیسائل لف ہے۔)

(2) - یہ کہ سائلہ نے بھرتی کے لیے ہوتے والا ٹیسٹ نہ صرف کو ایفائی کیا بلکہ میرٹ پر پہلا نمبر حاصل کیا جبکہ دوسرا نمبر مسماہ گلنازی بی بی کا تھا۔

(3) - یہ کہ یونین کونسل گڑھی حبیب اللہ میں گورنمنٹ گرلز پرائمری سکول بٹنگ نیا تعمیر ہو کر اس میں دو آسامیاں خالی تھیں جن پر سائلہ اور مسماہ گلنازی بی بی کی تعیناتی میرٹ کی بنیاد پر ہونی تھی۔

(4) - یہ کہ مذکورہ بالا پوسٹوں پر تعیناتی کرتے ہوئے گورنمنٹ گرلز پرائمری اسکول ڈنہ گھنیللا سے پہلے تعینات شدہ ٹیچر مس ستارہ امتیاز کو ڈنہ گھنیللا سے GGPS کرنول ٹرانسفر کیا گیا اور GGPS کرنول سے مس بادشاہ کو گورنمنٹ گرلز پرائمری اسکول بٹنگ میں ٹرانسفر کیا گیا جو اس طرح Seat Adjustment کی گئی اور سائلہ کی تعیناتی بدستور اپنی یونین کونسل کے کوٹہ کی سیٹ پر ہی رہی۔ (نقل آرڈر لف ہے۔)

(5) - یہ کہ بعد از تعیناتی سائلہ مورخہ 19.05.2012 کو گورنمنٹ گرلز پرائمری اسکول ڈنہ گھنیللا میں باقاعدہ چارج لیٹر اپنے فرائض منصبی سرانجام دینے شروع کیئے۔ (نقل چارج رپورٹ لف ہے۔)

Attested  
Muhammad Akhbar Khan Tanoli  
Advocate  
Distt: Courts Abuttabad

(6) - یہ کہ بعد ازاں سائلہ نے بروئے ٹرانسفر آرڈر مورخہ 15.05.2013 کو گورنمنٹ گرلز پرائمری اسکول چیم شوری ڈاٹھلی گڑھی حبیب اللہ میں حاضری کرتے ہوئے اپنے فرائض منصبی سرانجام دینے شروع کیئے جو تاحال اسکول مذکورہ میں ہی ڈیوٹی سرانجام دی۔ (نقل چارج رپورٹ لف ہے۔)

(7) - یہ کہ بعد ازاں سائلہ کو ایک Show Cause Notice نمبری 7758 جاری کیا گیا جو کہ سائلہ نے نوٹس مذکور کے جواب میں اپنی معروضات تحریری طور پر داخل کروائیں۔ (نقل نوٹس و جواب نوٹس لف ہیں۔)

(8) - یہ کہ تحت قانون جواب نوٹس داخل ہونے کے دو ماہ کے اندر اندر متعلقہ حکام اس امر کے پابند تھے کہ وہ سائلہ کو شنوائی کو موقع فراہم کرتے ہوئے مزید کارروائی کرتے مگر انتہائی حیران کن امر یہ ہے کہ سائلہ کو شنوائی کا کوئی موقع فراہم نہیں کیا گیا اور سائلہ کے رابطہ کرنے پر آج کل پرنٹل مٹول کی جاتی رہی تا آنکہ سائلہ کی حیرت کی انتہا نہ رہی جب مورخہ 03.03.2015 کو لیٹر نمبر End No1846-55/AE-/Estdated3.3.2015 کو سائلہ کو نوکری سے برخاستگی کی اطلاع ہوئی۔

(9) - یہ کہ حکم برخاستگی سائلہ بوجوہات ذیل قابل منسوخی ہے۔

(i) - یہ کہ سائلہ کی تعیناتی باقاعدہ قواعد و ضوابط کی پاسداری کرتے ہوئے تحت قانون ہوئی۔

(ii) - یہ کہ سائلہ نے اپنی نوکری کے دوران اپنے فرائض بطریق احسن سرانجام دیئے اور سائلہ کے خلاف کوئی شکایت نہ ہے اور سائلہ نے اپنی زندگی کے

Handwritten signature and stamp of the Government of Punjab, Department of Education, Lahore. The stamp includes the text 'GOVERNMENT OF PUNJAB', 'DEPARTMENT OF EDUCATION', and 'LAHORE'.

P-34

قیمتی 3 سال محکمہ کی خدمت میں صرف کیئے ہیں۔

(iii) - یہ کہ سائلہ کو Show Cause Notice پر شنوائی کا کوئی موقع نہیں دیا گیا۔

(iv) - یہ کہ حکم نسبت Termination سائلہ غلط، خلاف قانون مبنی بر بدینتی اور سیاسی دباؤ کا شاخسانہ ہے۔ جو حقوق سائلہ پر کالعدم و بے اثر ہے۔

استدعا ہیکہ مذکورہ بالا واقعات کی روشنی میں سائلہ کی اپیل منظور فرمائی جا کر Termination Order منسوخ فرمایا جا کر سائلہ کی بحالی کا حکم صادر فرمایا جاوے۔

المرقوم 09.03.2015

مسماة نائیدہ اشرف دختر محمد اشرف بیک PST چیئر کورنمنٹ گریڈ پرائمری اسکول چیمبر  
شموری گڑھی حبیب اللہ سائلہ

Na \* da

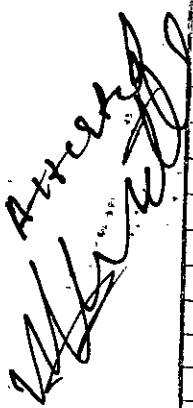
Munir  
Distt. Muzaffargarh  
Tandil  
ite  
Lahore

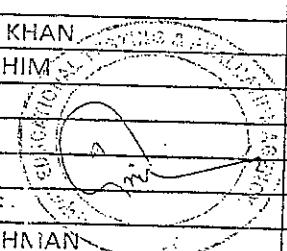
Annex " 9

P-35

## TAT-1 FEMALE MANSEHRA RESULT 2011

Roll No	Name	Father Name	Marks	%age
1700861	GHAZALA SHABANUM	ROSHAN KHAN	96	Fail
1700863	FARRUKH GUL	M IQBAL KHAN	88	Fail
1700864	NADIA	GOHAR JAMIL	124	41.33
1700865	RABIA NAZ	QAZI ISRAR UL HAQ	140	46.67
1700866	REHANA BIBI	M MEHBOOB	116	Fail
1700867	SITARA JABEEN	ABDUL HAMID	128	42.67
1700868	BIBI SUGHRA	M ISAQ	92	Fail
1700869	SAIRA BANO	GHULAM SARWAR	104	Fail
1700870	AMINA ZAMAN	HAIDER ZAMAN	160	53.33
1700871	DILSHAD BEGUM	HAYAT ULLAH	104	Fail
1700872	NUSRAT REHMANI	GHULAM REHMANI	120	40.00
1700873	FAZA REHMAN	KHALIL UR REHMEN	100	Fail
1700874	ALYIA BIBI	SHAH NAWAZ KHAN	116	Fail
1700875	MEHNAZ	M AKRAM	116	Fail
1700876	SADIA SHAHEEN	GUL HASSAN	144	48.00
1700877	RUBINA KOSAR	GUL HASSAIN	168	56.00
1700878	ZENIB	ALAM ZEB	156	52.00
1700879	BIBI KIRAN ALAM	S M ALAM SHAH	88	Fail
1700880	BIBI NOOSHEEN ALAM	S M ALAM SHAH	100	Fail
1700881	BIBI NAHEEDA	M BASHIR	124	41.33
1700882	NAILA FERDOS	M MURTAZA	96	Fail
1700883	SIDRA HAMAYUN	M HAMAYUN	132	44.00
1700884	NAZISH QAZI	QAZI M SAEED	108	Fail
1700885	NOSHEEN SAEED	QAZI M SAEED	96	Fail
1700886	ASMA GUL	M ASLAM	188	62.67
1700887	SANA SHAUDRI	ABDUL MANAN	152	50.67
1700888	KHADIJA RASHEED	M RASHEED	64	Fail
1700889	SADAF RAIZ	M RAIZ	156	52.00
1700890	SHAFTA GUL	KAMAL KHAN	Absent	#VALUE!
1700891	NISHEEN TABASUM	M NAWAZ	0	Fail
1700892	SAMIA MUJEEB	ABDUL MAJEED	64	Fail
1700893	PHULL BIBI	M NAWAZ KHAN	56	Fail
1700894	SHABNUM	GULAB	160	53.33
1700895	BIBI NASRIN	QASIM SHAH	52	Fail
1700896	NAZISH ASLAM	M ASLAM	108	Fail
1700897	ISRAT BEGUM	SAIN MOHD REHMANI	64	Fail
1700898	SAIRA BIBI	ABDUL JALIL	144	48.00
1700899	NAGINA BIBI	WALI JAN	68	Fail
1700900	SAFIA BIBI	CHANGAZ KHAN	40	Fail
1700901	BIBI AMINA	ABDUL RAHIM	Absent	#VALUE!
1700902	SHAZIA	M ZAMAN	84	Fail
1700903	BUSHRA JAHANZEB	JHANZEB	144	48.00
1700904	FOZIA BIBI	S ZAHOOR	8	Fail
1700905	SIDTA YOUSAF	M YOUSAF	132	44.00
1700906	GULNAZ	GOHAR REHMAN	112	Fail
1700907	TAMINA BIBI	GUL REHMAN	104	Fail
1700908	SADIA	ZAHIR UD DIN	116	Fail
1700909	SHUMAILA BIBI	HABIB UR REHMAN	144	48.00
1700910	NADIA REHMAN	ABDUL REHMAN	68	Fail
1700911	YASMIN WAHAB	ABDUL WAHAB	128	42.67
1700912	NADIA ASHRAF	M ASHRAF BAIG	168	56.00
1700914	RIZWANA SHAHEEN	FAZAL UR REHMAN	88	Fail
1700915	RABIHA IQBAL	IQBAL SHAH	144	48.00
1700916	KHUSHNUMA	NOOR UR REHMAN	140	46.67
1700917	BIBI ALYIA	MEHBOOB ALAM AWAN	84	Fail
1700918	GUL NAZ BAKYH	BAKTH REHMAN	148	49.33
1700919	SHUGUFTA BIBI	NAWAB DIN	128	42.67

Approved  




R-2

24

قیمتی

کورٹ فیس

# وکالت نامہ

بعدالت ۱۲۲۱ سرسین کمرشل بسٹاؤر

عنوان: ماہولہ اشرف اہل بنام گورنمنٹ پبلک ایجوکیشن ڈپارٹمنٹ

منجانب: اسٹوڈنٹ

نوعیت مقدمہ: ایڈ

## باعث تحریر آنکہ

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

گورنمنٹ پبلک ایجوکیشن ڈپارٹمنٹ

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 و دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناش بصیغہ مفلسی کے 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. Arshad Khan Tanali  
Adv. High Court Ad

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.782/2015

Respectfully Shewth

1. That the services appeal No: 782/2015 in respect of MST: Nadia Ashraf is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4076-81/F.No79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of PST (Notification attached).

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

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA



- 016

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

**NOTIFICATION.**

WHEREAS, Mst. Naida Ashraf PST at Government Girls Primary School Dannah Ganila District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1846-55 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. She belongs to U/C Garhi Habibullah where two (02) posts were lying vacant, while her name was at S. No 01 of the merit list of her U/C under ETEA R.No.1700912. She was appointed at her original U/C Garhi Habibullah but wrongly adjusted at GGPS Danna Ganailain U/C Karnol vide Endst. No.5360-84 dated 18/5/2012 at Sr.No.8.
2. Appeal may be accepted as she was on merit and eligible for appointment in her own U/C but wrongly adjusted in other U/C.


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. 1846-55 dated 03/03/2015 and reinstate Ms. Naida Ashraf PST at Government Girls Primary School Dannah Ganila District Mansehra with effect from the date of her dismissal with all back benefits.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4076-81 /F.No. 74/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. Sub Divisional Education Officer (Female) Mansehra
3. District Accounts Officer Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

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