

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.

  
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Dismissed as withdrawn.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.



ANNOUNCED  
20.10.2015

20.10.15

Form- A  
FORM OF ORDER SHEET

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

Case No. 763/2015

| 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. Saba Noor 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;"><br/>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;"><br/>CHAIRMAN</p>  |

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

Appeal no. 763/2015

Saba Noor (Qaria) Govt. GGHSS Baffa 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        | 1-9   |
| 2    | Copy of Advertisement    | "A"      | 10    |
| 3.   | testimonial documents    | "B"      | 11-27 |
| 4    | Appointment order        | "C"      | 28-30 |
| 5    | show cause notice        | "D"      | 31-32 |
| 6    | certificate, Dismissal   | "E"      | 33    |
| 7    | Merit list               | "F"      | 34-35 |
| 8    | Wakalatnama              |          | 36    |

Dated: -----/2015

Appellant

Through

  
**Muhammad Arshad Khan Tanoli**

Advocate, High Court

Abbottabad

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

Appeal No-763/2015 ①

A.W.F Province  
Service Tribunal

Diary No. 795

Dated 8-7-2015

Saba Noor (Qaria) Govt. GHSS Baffa 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 Qaria in Dailly "The Aaj" dated 20/5/2011 for appointment of

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Qaria. The Appellant fulfills the entire criteria which sine qou non for appointment for the post of Qaria. Annex "A"

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 Talhata and latter on transferred from GGHS Talhata to GGHSS Baffa vide appointment order endrst No 893/942 ESTT (APPTT)Qaria Dated 16/6/2012 and thereafter a corrigendum was issued for transfer of the appellant from GGHSS Talhata to GGHSS Baffa vide order endrst. No 1658-64/AE/II. dated 30/6/2012. Copy of appointment order and corrigendum is annexed as Annexure "B" & "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.

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5. That, the appellant was though dismissed from service by the respondent's department on 3.3.2015 but she obtained status quo from Civil Courts Mansehra, there respondent department is paid salary to the appellant till June 30<sup>th</sup> June 2015.
  
6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi DEO, Shamim Akhtar was found attached with the show cause notice, wherein it was mentioned against the name of appellant that "No 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 appellat was properly replied by her mentioning that the appellant applied for the post of Qaria and appeared in ETTA Test under Roll NO 1700739 and obtained 132 out of 300 marks and was placed at S.No 20 of the merits list and thereafter was appointed on merit and also stated that

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Sannad which were provided by her at the time of appointments were issued by the registered Institution/maddaris and this regards, the appellant also placed verification performa issued by the Trust Jamiyat Taleem ul Quran dated 12.11.2012 as well as certificate of affiliation of madarisa taleem ul Quran lil Banat al-muslimeen Chikiya Road Mansehra from where she obtained Sannads of Hifz and Tajweed with Wafaq ul Maddaris al Arabia, Pakistan. Copy of verification Performa and affiliation certificates are annexed as annexure "E" & "F". 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 or having the said sunned from recognized Institutions be appointed vide letter No 51 34 1 dated 14.5.2012. Respondent No 2 annotated remarks on the said letter for respondent No 3 which read "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. Copy of letter dated 14.5.2012 of Respondent 3 having remarks of Respondent No 2 is annexed as Annexure "G"

8. That, besides this, respondent No 2 issued guideline regarding appointment of Qaria posts wherein respondent No 1 directed Respondent No 3 that Sunnads of

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Registered Institutions affiliated with wafaqul Madarias may please be accepted for purposes of recruitment of Qari/Qaria. Copy of letter of Respondent No 1 dated 7/6/2012 is attached as annexure "H".

9. That, documents testimonial of the appellant were sent to the concerned quarters for verification which were return dully verified by the relevant institutions/Madaris, hence, thereafter salary of the appellant was released.
10. 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 1686-95/AE dated 3.3.2015. Copy of impugned dismissal order of appellant is attached as annexure "G".
11. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 9.3.2015. Copy of departmental appeal /representation is attached as annexure "H" but respondent No 2 did not bother to reply the



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representation of the appellant so for. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

### GROUNDS

- a. That, the appellant fulfilled the criteria of appointment as Qaria being qualified. The appellant was appointed on merit on the recommendation of Departmental Selection Committee and was placed at S.No 20 of the merit list.. Copy of merit list is attached as Annexure "H". 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 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

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the basis of sannads similar to that of appellant. Therefore if hundreds of female Qarias are serving in Educational Department on the basis of similar sannads then the appellant is also entitled to serve the department as per law. Hence impugned dismissal order is liable to be set aside.

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

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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, it is submitted that sannads of Tajweed and Hifz ul Quran issued by the Maddirasa Taleem ul Quran lil Banat almuslimeen Chakeha Road Mansehra is dully affiliated with Wafaq ul Maddaris. Copy of Certificate of affiliation issued by Wafaq Ul Madaris Al Arabia Pakistan is annexed as Annexure "I".
- h. 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.
- i. 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

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cannot be dismissed for the acts committee by the ex-  
EDO.


j. 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 1686-95/AE 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: 7/1-2015

  
Appellant

Through

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

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

Saba Noor (Qaria) Govt. GGHSS Baffa 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, Saba Noor (Qaria) Govt. GGHSS Baffa 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

*Saba Noor*  
Deponent



**Amna**  
 10

20-5-2011  
 11/05-2011

| نمبر | تاریخ      | نمبر | تاریخ      | تاریخ      | نمبر | تاریخ      | نمبر | تاریخ      | نمبر |
|------|------------|------|------------|------------|------|------------|------|------------|------|
| 1    | 15-07-2011 | 1    | 15-07-2011 | 15-07-2011 | 1    | 15-07-2011 | 1    | 15-07-2011 | 1    |
| 2    | 15-07-2011 | 2    | 15-07-2011 | 15-07-2011 | 2    | 15-07-2011 | 2    | 15-07-2011 | 2    |
| 3    | 15-07-2011 | 3    | 15-07-2011 | 15-07-2011 | 3    | 15-07-2011 | 3    | 15-07-2011 | 3    |
| 4    | 15-07-2011 | 4    | 15-07-2011 | 15-07-2011 | 4    | 15-07-2011 | 4    | 15-07-2011 | 4    |
| 5    | 15-07-2011 | 5    | 15-07-2011 | 15-07-2011 | 5    | 15-07-2011 | 5    | 15-07-2011 | 5    |
| 6    | 15-07-2011 | 6    | 15-07-2011 | 15-07-2011 | 6    | 15-07-2011 | 6    | 15-07-2011 | 6    |
| 7    | 15-07-2011 | 7    | 15-07-2011 | 15-07-2011 | 7    | 15-07-2011 | 7    | 15-07-2011 | 7    |

عمومی شدہ اضلاع: (1) تمام تقریباً حکومت پنجاب کے تمام اضلاع کے مطابق غیر پیش اور کرکری کے دیگر بنیاد پر ہوگی۔ (2) تمام سرکاری ملازمین اپنے عمل کی وراثت سے درخواست دینے کے باوجود ہونگے۔ (3) ہنڈر اور انڈر کیلئے ہنڈر کو پیش ہے جس کیلئے (Standing Medical Board) کا سرٹیفکیٹ پیش کرنا لازمی ہے۔ (4) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (5) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (6) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (7) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (8) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (9) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (10) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (11) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (12) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (13) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (14) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔ (15) ہنڈر اور ہنڈر کے سرکاری ملازمین کے لیے درخواست دینے سے ہنڈر کو پیش کرنا لازمی ہے۔

AB 44%  
 132  
 44%  
 120  
 41%  
 124

Attested  
 [Signature]  
 Dist: Courts Abbottabad

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

بیت شیخ نورانی نے شیخ محمد حنفی حفظہ قرآن مجید کی سند حاصل کی۔ سند نمبر ۱۲

# سند الفقہاء کبارہ

کتابہ روڈ ڈیپٹی کمشنر مارشہرہ پاکستان

بافتہ نامہ محمد عیسیٰ المصطفیٰ پاکستان

اللہ اعلم بالصواب، وحده وحده، والحمد لله رب العالمین، انشاء اللہ العالی

الحمد

بیت شیخ نورانی نے شیخ محمد حنفی حفظہ قرآن مجید کی سند حاصل کی۔ سند نمبر ۱۲

نورانی نے شیخ محمد حنفی حفظہ قرآن مجید کی سند حاصل کی۔ سند نمبر ۱۲

محلہ خان مارشہرہ پاکستان

خلقت نسمة الفخرية من الفجر...  
و بركة و انوار...  
الخلق و الفقه...  
بیت شیخ نورانی نے شیخ محمد حنفی حفظہ قرآن مجید کی سند حاصل کی۔ سند نمبر ۱۲

Attested

PRINCIPAL  
Govt. Central Model  
School, Marshra

۱۲-۱۱-۲۰۰۰

Attested

Muhammad

بیت شیخ نورانی نے شیخ محمد حنفی حفظہ قرآن مجید کی سند حاصل کی۔ سند نمبر ۱۲

شہادہ

مکمل شد

شہادہ

مستند شد

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ نَحْمَدُهُ وَنُصَلِّي عَلَى رَسُولِهِ الْكَرِيمِ

GCMSS بفتح سے لیٹر نمبر 458 وصول ہوا جسکی  
دستی ہون کہ صباروں ہفت شیخ نورانی نے سن 2008 میں قرآن العزیز مع تجزیہ سنداً نمبر 9622  
کی سند حاصل کی۔

سند صحیح  
الواقعة - چکیا روڈ ماہرہ - فیصلہ ماہرہ کابینہ  
تأسیس تمام جمیعت المسلمات پاکستان

شیخ  
محمد سلیمان  
نورانی  
صدر  
جمیعت المسلمات  
پاکستان

اللہ انہی وعلمہ کتابہ فظ حروف ووزنہ وادبہ لصلوات اللہ علیہ وآلہ وفضلہ ووفاء  
الجمہ لذل انزل عبدہ وخاعلینا فہ خد وادبہ لصلوات اللہ علیہ وآلہ وفضلہ ووفاء

وفاکے تین سہ تین المثنیٰ وورہ جاونہ ووفاء ووفاء  
انہ صحتہ الشاہ باذ الذہن لجمہ ان عمودہ ووفاء ووفاء

فان اختلفنا والذہن صباروں  
شیخ نورانی

المترجمہ - محلہ خان پادری من مضافات ماہرہ - دخلت فی سنۃ

البنات تعلیم اسلام الفکر الحکیم فقرت الفکر المحمدیج الجود والرحمۃ وسنہا علیہا الوقت  
تکون سند انہ ہذا النعمہ وتلوہ انہما نسنا بماہن ووفاء ووفاء العباد والعباد

المعا وحسنہ ووفاء ابتغاہ من اللہ کبارضن شہادہکم انہما نسنا بماہن ووفاء ووفاء  
وشررت الاخلاص فترہ مرضا ووفاء ان عمودہ لہ انہما نسنا بماہن ووفاء ووفاء

فیستجیبوا ابی رسولہ صلی علیہ وآلہ وسلم فی خلقہ وانہ صلیا جمیعین

Attested

Muhammad  
District Judge Abbottabad

Principal  
GCMSS

۲۲-۱۱-۲۰۰۸  
الخ اعظم السنہ

شہادہ منہمک  
ملا تبتلہ ہذا

طریقہ تجارت  
شہادہ صحتہ  
النسبتنا بالذہن  
جمیعت المسلمات



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

يَا أَيُّهَا الرَّسُولُ بَلِّغْ مَا أُنزِلَ إِلَيْكَ مِنْ رَبِّكَ ۚ وَإِنْ لَمْ تَفْعَلْ مَآ بَلَغْتَ بِسَاتِكَ ۚ وَاعْلَمْ أَنَّكَ أَنْتَ خَلْقُ اللَّهِ ۚ فَاصْبِرْ ۚ إِنَّكَ عَلَىٰ عِندِ رَبِّكَ بِرَأْيِكَ ۚ وَرَبُّكَ عَلَىٰ كُلِّ شَيْءٍ قَدِيرٌ ۚ

۱۱۱



# طرسٹ جمعیت تسلیم القرآن

پنجاب صدر ضلع اترجات آزاد کشمیر  
0423-5018276  
0423-5341314  
0423-5341315

تبع اجراء ۲۰۱۲ء

صفحہ ۳۰۸

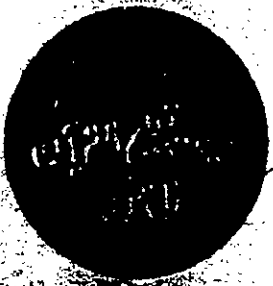
## سند برائے مکالمین و معلمات قرآن حکیم

لِلْمَدِينَةِ وَالْحَبِيبِ وَأَلِيٍّ مِّنَ الْأَنْبِيَاءِ عَلَيْهِ السَّلَامُ وَالصَّلَاةِ وَالسَّلَامُ عَلَى سَائِرِ الْمُرْسَلِينَ مُحَمَّدٌ وَعَلَىٰ آلِهِ وَالصَّالِحِينَ مِنْ أُمَّتِهِ أَدْعَاةً وَبُرْهَانًا وَرَحْمَةً مِّنَ اللَّهِ إِلَيْنَا إِنَّ اللَّهَ شَدِيدُ الْعِقَابِ ۗ

Quran

تقدیر کی جالتہ، کہ محترم / محترمہ  
صبا نور  
مکہ خان بہادر بیت الشیخ ضلع مانہرہ  
من اجرت / مزد  
شرح لوزر الہی  
شخصی کارڈ نمبر  
ذمہ داریت طالب علم ادارہ کی تربیت گاہ جامعۃ الصالحات بلنات الاسلام مانہرہ  
میں قاعدہ پندرہ ٹیک بورڈ  
نومبر ۲۵ اگست تا ۲ ستمبر ۲۰۰۶  
پہلے کی تربیت حاصل کی اور امتحان میں ۸۹ فیصد نمبر حاصل کر کے  
درجہ اول میں کامیابی حاصل کی۔

اس تربیت کو حاصل کرنے کے بعد یہ پندرہ ٹیک بورڈ قاعدہ اور صحیح خواجه کے ساتھ قرآن حکیم پڑھانے کے اہل قرار دیے جاتے ہیں۔  
قطبائے کہ اشرف رب العزت ان کو زیادہ سے زیادہ پختل کو قرآن کریم صحیح خواجه کے ساتھ پڑھانے کی توفیق عطا فرمائے آمین



دستخط صدر  
دستخط ناظم تعلیمات

ATTES

25/7/12

رجل آفس ٹرسٹ جمیعت تعلیم القرآن  
A-4 سوسائٹی بلازہ کینال بیگ روڈ مزیمیر ٹاؤن لاہور  
فون: 0423-5961830/0423-5961730  
0423-7499008  
Email: jtqahore@hotmail.com

جمیعت تعلیم القرآن



بلازہ کینال بیگ روڈ مزیمیر ٹاؤن لاہور

تاریخ: 12-11-2014

۱۵

حوالہ نمبر: ایم ایف/جنرل/26 کورس فائل (1179/D) 2014ء

## تصدیق نامہ

تصدیق کی جاتی ہے کہ مسماۃ صباہ نور دختر شیخ نور الہی نے ٹرسٹ جمیعت تعلیم القرآن کے تحت جامعہ صالحات ڈب نمبر 1 مانسہرہ میں جمیعت کا 35 روزہ کورس برائے تربیت معلمات پاس کیا ہے۔ جس کا سند نمبر 3089 ہے۔  
نیز ادارہ کار رجسٹریشن نمبر 2586 ہے۔ جو کہ گورنمنٹ آف پاکستان سے 1969ء سے رجسٹرڈ ہے۔

طالب دعا

راوی  
پروفیسر راؤ شوکت علی  
ایڈیشنل سیکرٹری

Trust Jamiat Taleem-ul-Quran

Attested

Muhammad  
Muhammad  
District: Lahore, Punjab

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



# تتھادۃ حفظ القرآن الحریم

مدرسة مرکزی دارالقرآن  
نلمندی • بشاور • پاکستان

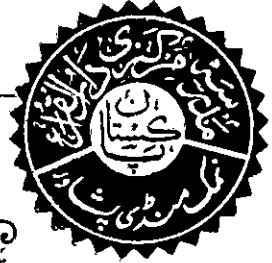
الْحَمْدُ لِلَّهِ رَبِّ الْعَالَمِينَ وَالْعَاقِبَةُ لِلْمُتَّقِينَ وَالصَّلَاةُ وَالسَّلَامُ عَلَى سَيِّدِ الرَّسُلِ وَخَاتَمِ النَّبِيِّينَ  
وَعَلَى آلِهِ وَأَصْحَابِهِ وَاتَّبَاعِهِ أَجْمَعِينَ : وَبَعْدُ : يَشْهَدُ رَئِيسُ الْمَدْرَسَةِ بِأَنَّ الطَّالِبَ

: الحافظه صباہ نور بنت شیخ نورانی من حکماء مانسبرہ :

قَدْ حَفِظَ الْقُرْآنَ الْحَكِيمَ كَامِلًا وَمُكْمَلًا بِظَهْرِ الْغَيْبِ وَقَرَّرَ رَئِيسُ الْمَدْرَسَةِ  
شَهَادَةَ حِفْظِ الْقُرْآنِ الْحَكِيمِ وَيُوصِيهِ بِتَقْوَى اللَّهِ عَزَّ وَجَلَّ وَأَنْ يَتْلُو الْقُرْآنَ  
الْحَكِيمَ أَنَا، اللَّيْلَ وَأَنَارَ النَّهَارِ وَأَنْ يَعْمَلَ بِأَحْكَامِهِ وَأَنْ يُعَلِّمَهُ غَيْرَهُ  
وَاللَّهُ الْمَوْفِقُ وَالْمُعِينُ

الله

Muhammad  
Abad



توقيع ناظم التعليمات

Handwritten signature of the supervisor of instructions.

توقيع المدير

Handwritten signature of the director.

توقيع المحقق

Handwritten signature of the verifier.

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ  
بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ  
بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

رقم السند 29030

رقم الجلوس 1

الدرجات 95/100

تاريخ الاجازة 2012م-1433هـ

Reg. No. 011/0391

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

مدرسة مركزى دارالقرآء

نكسدى • شاوړ • باكستان



# كشف الدرجات

امتحان التجويد وقراءة القرآن الكريم

عام 1434 هـ

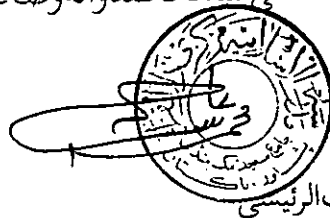
2013ء

اسم الطالب صياء نور اسم الوالد شيخ نور الهىتاريخ الميلاد 18-02-1985 المديرية جكيا مانسهره

| الدرجات المحصلة | الدرجات النهائية | المادة  |
|-----------------|------------------|---|
| 95              | 100              | التدوير جميع القرآن   |
| 90              | 100              | الترتيل جز الواحد من القرآن                                       |
| 95              | 100              | كتب التجويد جمال القرآن، تعلم التجويد فوائدكمية، والمقدمة الجزرية |
| 90              | 100              | اجراء التجويد جميع القرآن   |
| 100             | 100              | فقه و حديث تعليم الاسلام مع جهل حديث                              |
| 100             | 100              | ترجمه سورة الضحى الى سورة الناس                                   |
| 570             | 600              | مجموع الدرجات   |

تشهد إدارة دارالقرآء المركزية بأن الطالب المذكور قد نجح فى إختبار النهائى

بتقدير ممتاز وصلى الله على سيدنا محمد واله وصحبه وسلم



المكتب الرئيسى

رقم السند 29032

رقم الجلوس 1

تاريخ الاصدار 1434/م/2013

Reg. #: 344/5/391

Muhar...

Distt: ...



# السنن

للإمام أحمد بن حنبل

مدرسة مركزى دار القراء  
نك مندى • بشاور • باكستان

الحمد لله الذي آتانا كتابه وما قطع علينا جرحه وفوق ذلك آتانا فيه حصة من نور العلم والهدى والحيات والصلوات والسلام على سيدنا محمد بن عبد الله الذي بعثه فينا نبيا صالحا محمدا خاتم الأنبياء والمرسلين صلى الله عليه وآله وسلم وآلِهِ الطيبين الطاهرين الأئمة المعصومين صلوات الله عليهم أجمعين

القاريه صباء نور بنت شيخ نور الهى من جكياہ مانسہرہ

أذلة الله عز وجل من علمه ما في كتابه الخبز فإذما أتت في كتابه القرآن جازوا على وأجمع على الإمام أبي حنيفة رحمه الله تعالى الذي هو في هذا العلم والشريعة والهدى والصلوات والسلام على سيدنا محمد بن عبد الله الذي بعثه فينا نبيا صالحا محمدا خاتم الأنبياء والمرسلين صلى الله عليه وآله وسلم وآلِهِ الطيبين الطاهرين الأئمة المعصومين صلوات الله عليهم أجمعين



توقيع ناظم التعليمات

Signature of the Education Officer

توقيع المدير

Signature of the Director

رقم السند 29032

رقم الجلوس 1

الدرجات 570/600

تاريخ الإصدار 2013-1434

Reg. #: 344/5/391

Attested  
Signature

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

**وفاق المدارس لعربية**  
باكستان

**كشَفُ الدَّرَجَاتِ**

امتحان شهادة الثانوية العامة في العلوم الإسلامية والعربية (ميترك)  
ع ٢٠٠٣ - ١٤٢٤ هـ (السنوات)

رقم التسجيل ٧٠١١٤ ..... رقم الجلوس ١٣٣٠٦

اسم الطالبة **صبا نور** ..... اسم القوالد **شفيع نور الهبي**

التاريخ الميلاد ٥٠٤٠٥ هـ ١٩٨٥ م

اسم الجامعة / المدرسة **جامعة الصالحين للبنات الاسلاميه مانسهره**

| المادة  | الدرجة | المادة                | الدرجة |
|---------|--------|-----------------------|--------|
| التفسير | ٥٢     | الصرف                 | ٥٤     |
| الحديث  | ٧٠     | التحوي                | ٤٢     |
| الفقه   | ٥٨     | التاريخ والأدب العربي | ٦٠     |

الدرجة الضغرى ٤٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ٦٠٠ - الدرجات المحصلة ٣٣٦

تشهد إدارة وفاق المدارس لعربية أن الطالبة المذكورة اعلاه قد اجتجت في امتحان الشهادة الثانوية العامة بتقدير **(جيد)**

وكل الله على سيدنا محمد وآله وصحبه وسلم

المكتب الرئيسي ملتان

توقيع مراقب الامتحان

التاريخ ٢٠٠٣/١١/٢٠

Attestation



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# شهادة الثانوية العامة

في اللغة العربية والعلوم الإسلامية



الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة  
 وفاق المدارس العربية في باكستان، تشهد بأن الطالبة ..... صباه نور ..... بنت ..... شيخ نور المصطفى ..... من ..... مانهمره .....  
 المؤلودة في عام ..... ١٩٨٥م قد أنهت دراسة الثانوية العامة في مجال الملاحات للبنات الاسلاميه مانهمره ونجحت في الامتحان النهائي المنعقد  
 تحت إشراف وفاق المدارس العربية في باكستان في شعبان ١٤٢٤هـ بتقدير (جيد) وبأنها على ذلك استحققت الشهادة  
 ورئيس الوفاق اذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل العالقات العاملات.



مدير التعليم  
 محمد حنيف الجمالدهري  
 Muhammad Tanoli  
 Associate  
 Abbottabad

مدير التعليم  
 محمد حنيف الجمالدهري

مدير التعليم  
 محمد حنيف الجمالدهري

رقم التسجيل ..... ٢٠١١٢  
 رقم الجلوس ..... ١٢٣٠٩  
 الذريجات ٦٠ / ٣٣٦  
 محل الإصدار: (مكتب التعليم في باكستان)  
 التاريخ: ٢٠١٤/٥/٢٠

(27)

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وفاق المدارس العربیة  
پاکستان

**كشف الدرجات**

امتحان شهادة الثانوية الخاصة في العلوم الإسلامية والعربية (ايضا)  
عام ١٤٢٥ هـ (للكليات)

رقم التسجيل ٤٤٠٠٣ ..... رقم الجلوس ٨٥٣٤

اسم الطالبة صبا نور ..... اسم الوالد شيخ زرار النبي

المديونية ..... تاريخ الميلاد ١٤٠٥ هـ / ١٩٨٥ م

اسم الجامعة / المدرسة جامعة الصالحين راب نيميل حاسم

| الدرجة | المادة               | الدرجة | المادة  |
|--------|----------------------|--------|---------|
| ٧٢     | اصول الفقه           | ٨٤     | التفسير |
| ٤٢     | النحو                | ٦٤     | الحديث  |
| ٤٩     | الأدب العربي والشايع | ٤٠     | الفقه   |

الدرجة الضغري ٤٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ٦٠٠ - الدرجات المتصلة ٣٥١

تشهد إدارة وفاق المدارس العربیة أن الطالبة المذكورة أعلاه قد نجحت في امتحان الشهادة الثانوية الخاصة  
بتقدير جيد ..... وصلى الله على سيدنا محمد وآله وصحبه وسلم

المكتب الرئيسي بلتان توقيع مراقب الامتحان

التاريخ ٢٥ من شهر ربيع الأول

A. U. K.

Muham

Disa





بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# شهادة

## الثانوية الخاصة

في اللغة العربية الإسلامية



الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة وفاق المدارس العربية بباكستان، تشهد بأن الطالبة ..... صبا نفور ..... بنت ..... شيخ نفور الهادي ..... من ..... ما فسره ..... المولودة في عام ..... 1405 هـ. قد أتمت دراسة الثانوية الخاصة في جماعة الصالحين للإسلاماء ما فسره. ونجحت في الامتحان النهائي المنعقد تحت إشراف وفاق المدارس العربية بباكستان في شعبان 1405 هـ. بتقدير (جيد) ..... وبناءً على ذلك استحققت الشهادة ورئيس الوفاق إذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل العالقات العاملات.



رئيس وفاق المدارس العربية بباكستان  
 Director  
 Board of Intermediate and Secondary Education  
 Abbottabad

رئيس وفاق المدارس العربية بباكستان  
 Director  
 Board of Intermediate and Secondary Education  
 Abbottabad

رئيس وفاق المدارس العربية بباكستان  
 Director  
 Board of Intermediate and Secondary Education  
 Abbottabad

رقم التسجيل ..... 1003  
 رقم الجلوس ..... 8536  
 الدرجات 100 / 351  
 محل الإصدار: وفاق المدارس العربية بباكستان  
 التاريخ: 1405/9/6  
 11/2

23



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وفاق المدارس العربية  
باكستان

## كشف الدرجات

متحان الشهادة العالية في العلوم الإسلامية والعربية (بي.ك)

عام ١٤٢٦ هـ (اللسانات)

رقم التسجيل 1424-05-012306 2005 رقم الجلوس 6345

اسم الطالب صانور ..... اسم الوالد شيخ نور الهي

المديونية مانصهره ..... تاريخ الميلاد 1985 هـ

اسم الجامعة/المدرسة جامعة الصالحات لبنات الاسلام مانصهره

الحاق نمبر 01520 ذب نمبر

| الدرجة | المادة       | الدرجة | المادة        |
|--------|--------------|--------|---------------|
| 43     | الفرائض      | 61     | التفسير       |
| 45     | البلاغه      | 69     | الحديث واصوله |
| 68     | الادب العربي | 40     | الفقه         |

الدرجة الصغرى ٤٠- الدرجة الكبرى ١٠٠- مجموع الدرجات ٦٠٠- الدرجات المحصلة 326

تشهد ادارة وفاق المدارس العربية ان الطالب المذكور اعلاه قد نجح في امتحان الشهادة العالية

بتقدير (جيد) - وصل الله على سيدنا محمد وآله وصحبه وسلم

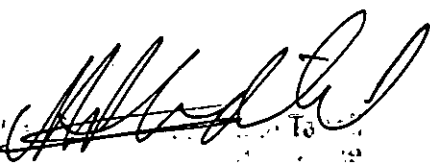
توقيع مراقب الامتحان



المكتب الرئيسي ملتان

الشارح 18-10-2005

Attested

Mu'  To

Distt: Court

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



# شهادة العالمية في العلوم الإسلامية



الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين، وعلى الله وصحبه أجمعين. أما بعد، فإن رئاسة  
 وفاء المدارس العربية بباكستان، تشهد بأن الطالبة صابنور بنت شيخ نورالهي من ..... مانجهره  
 المولودة في عام 1305 هـ. قد أتت الدراسة العالمية في جامعة الصالحات لنياب الاسلام ..... ونجحت في الامتحان النهائي المنعقد  
 تحت إشراف وراقى المدارس العربية بباكستان في شعبان 1427 بتقدير (جيد) ..... وبذلك استحققت الشهادة العالمية  
 ورئيس الوفاق إذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل الصالحات العاملات،



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 [Signature]  
 [Signature]  
 [Signature]  
 [Signature]  
 [Signature]

[Signature]  
 [Signature]  
 [Signature]

رقم التسجيل 1424-05-0123/6  
 رقم الجلوس 6345  
 الدرجات 326 / 1  
 محل الإصدار [Signature]  
 التاريخ 17-9-1427  
 18-10-2005

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

**وفاق المدارس العربیة**  
پاکستان

**كشف الدرجات**

امتحان الشهادة العالمية في العلوم الإسلامية والعربية (الطبعة الإسلامية)

عام ٢٠٠٦ هـ (١٤٢٦ م) (للسنة)

رقم التسجيل 1424-05-012306 رقم الجلوس 5509

اسم الطالب صانور ..... اسم الوالد شيخ نور الهوى

المديونة مانمبره ..... تاريخ الميلاد ١٣٠٥ هـ / 1985 م

اسم الجامعة جامعة الصالحات لسات الاسلام

الحاق نمبر 01520 ذب نمبر 1 مانمبره

| الدرجة | الكتاب                       | الدرجة | الكتاب                       |
|--------|------------------------------|--------|------------------------------|
| 58     | الصحیح للبخاری <sup>١٤</sup> | 69     | الصحیح للبخاری <sup>١٤</sup> |
| 47     | الجامع للترمذی <sup>١٤</sup> | 60     | الجامع للترمذی <sup>١٤</sup> |
| 64     | السنن لأبي داود              | 46     | الجامع للترمذی <sup>١٤</sup> |

الدرجة الصغرى ٤٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ١٠٠ - الدرجات المتصلة 344

تمت اقامة وفاق المدارس العربیة أن الظالبة المذكورة أعلاه قد اجتازت في امتحان الشهادة العالمية بتقدير (جيد)

وَصَلَّى اللَّهُ عَلَى سَيِّدِنَا مُحَمَّدٍ وَآلِهِ وَحَضْرَتِهِ وَسَلَّمَ

توقيع مراقب الامتحان

المكتب الرئيسي وفاق المدارس العربیة

التاريخ 22-09-2006 م

Principal  
G.C.P.S.S. / A-62

26

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



# شهادة الامتياز وفاء المدارس العربية والاسلامية



الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة  
 وفاق المدارس العربية بباكستان، تشهد بأن الطالبة صانور بنت شيخ نور الحق من مانسهره  
 المولودة في عام 1985 م قد أتمت الدراسة النهائية في جامعة الصالحات لبات الاسلام ونجحت في الامتحان النهائي المنعقد  
 تحت إشراف وفاق المدارس العربية بباكستان في رجب 1428 بتقدير (جيد) وبأنها على ذلك استحققت الشهادة.  
 ورئيس الوفاق إذ يمنحها هذه الشهادة، يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل العالقات العاملات،



حبيب حسن

*Muhammad Ali Khan*  
Principal  
G.M.S.S. Ahar

رقم التسجيل

رقم الخلو

سلم السخان

1424-05-012306

5509

344

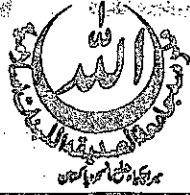
محل الإصدار: رئاسة وفاق المدارس العربية بباكستان

التاريخ: 22-09-2006

# مدیریت جامعہ الصدیقہ اللہیات الاسلامیہ

میراچکیاء ضلع مانسہرہ پاکستان

(27)



03335372123  
03455327103

الحاق

دارالمرکز میڈیکل اور القراءت مرکز میڈیکل اور  
رجسٹریشن نمبر: 344/5/391 م 1969  
مظہور شدہ وزارت تعلیم حکومت پاکستان صوبہ پنجاب لاہور

تصدیق کی جاتی ہے کہ صبا نور بنت شیخ نور الہی ساکنہ میراچکیاء ضلع مانسہرہ کی رہائشی و سکونت گاہ ہے اور ادارہ ہذا میں  
2009 سے بحیثیت مہتممہ دینی خدمات سرانجام دے پارہی ہے جس سے علاقہ کی بچیاں قرآن کریم کی تعلیم اور اخلاقی و  
اسلامی تہذیب سے روشناس ہو رہی ہیں۔

دعا ہے کہ اللہ ان کی زندگی میں برکت عطا فرماتے ہوئے ان کو زیادہ سے زیادہ دینی خدمات سرانجام دینے کی

توفیق نصیب فرمائے۔ آمین

ما ذلت علیہ  
انچارج

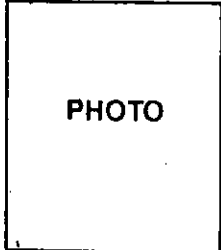
جامعہ الصدیقہ اللہیات الاسلامیہ  
میراچکیاء ضلع مانسہرہ  
مدیریت جامعہ الصدیقہ اللہیات الاسلامیہ  
میراچکیاء مانسہرہ

Attested

Muhammad Tanoli  
Advocate  
Distt. Capital Abbottabad

28

# DOMICILE CERTIFICATE



I declare that I am born of present who are permanently domiciled in N.W.F. Province  
Having been born in this Province.

I was born at MANSEHRA Tehsil MANSEHRA  
District MANSEHRA

I passed Pnmary Education from GOVT: GIRLS PRY: School MANSEHRA  
Resident of BAIT-UL-SHEIKH, MOHALLAH KHAN BAHADAR MANSEHRA

Tehsil MANSEHRA  
District MANSEHRA

Sd/ SABA NOOR Dated 25-02-2000

Pursuance to the declarat on dated \_\_\_\_\_

Filed by SABA NOOR D/O SHEIKH NOOR ELLAHI  
Tribe RANPOGT Section SHEIKH Sub Section XXX

OF MOH: KHAN BAHADAR. Tehsil MANSEHRA District MANSEHRA

To the effect that he had been born of parents who are permanently domiciled in  
N.W.F. Province having been born withinto \_\_\_\_\_ at \_\_\_\_\_.

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

Given under my had and the scal of Court this \_\_\_\_\_  
22 no/day of March 2000

MAGISTRATE 1ST CLASS \_\_\_\_\_  
Date: 28/3/2000

Countersigend \_\_\_\_\_  
DISTRICT MAGISTRATE \_\_\_\_\_  
District Magistrate  
Mansehra

\_\_\_\_\_  
Advocate  
Mansehra

تعمیراتی کتب جاتی ہیں کہ عباد اور والد شیخ زور الہی نے گورنمنٹ کتب خانہ میں  
حقوقہ پبلشرز سکول ٹمبر کا ساٹھ سو روپے یا ان کے اجازت باس کمری میں

اقول سید گورنمنٹ کتب خانہ ڈل سکول حقہ یہ از رتب عباد

مائنہ  
2010

تعمیراتی کتب خانہ عباد اور شیخ زور الہی کتب خانہ  
عباد اور عباد کتب خانہ کتب خانہ  
کتب خانہ - عباد اور کتب خانہ

14/3  
میں

سید

خط عالی

حساب تصدیق صاحب محبوب علی خان سابقہ گورنمنٹ کتب خانہ عباد اور دفتر شیخ زور الہی  
مکتبہ محلہ خان بہادر جو جمع مال سہرہ تحصیل و ضلع مال سہرہ صوبہ سرحد کی آبادی

سے رہائشی و پیدائشی - ایوٹ فرض سے  
2000/3  
2000/3

21.3.2000



28

Annex

B

15

Annex

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRAORDER

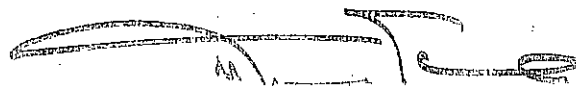
As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following Qaria teachers (Female) against vacant posts mentioned against each in BPS-9 @ Rs.6200-330-17600 pm plus usual allowances as admissible under the rules in the interest of Public Service 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 HAMAYUN         | 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      | GGHS 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 | GGHS BAFFA           | AV/Post |
| 16 | BUSHRA BIBI        | LAL KHAN             | PHULRA            | GGHS SAWAN MAIRA     | AV/Post |
| 17 | MAMOONA WAJID      | WAHJID               | BHERKUND          | GGHS GHANOOL         | AV/Post |
| 18 | HAMEEDA            | MOHD YOUSAF          | PHULRA            | GGHS JARED           | AV/Post |
| 19 | TABSUM             | MOHD NAZIR           | OGHI MANSEHRA     | GGHS TIRAWIRA        | 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.



Muhammad Arshad Khan Tanoli  
 Add: ...  
 Dist: Courts Abbottabad

4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards CP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
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 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 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.

  
 EXECUTIVE DISTRICT OFFICER  
 E&SE MANSEHRA

**Muhammad Arshad Khan Tanoli**  
*Advocate*  
 Distt: Courts Abbottabad

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~~Annex~~

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELE: & SECY MANSEHRA

CORRIGENDUM

In petrol modification of this office Endst: No.893-942/Estt: (F)Apptt: aria (F) 2012 dated 16/6/2012 please read GGHS Baffa instead of GGHS Talhatta at S.No.20 in the interest of public service with effect from her date of taking over charge.

Note:

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

---Sd---

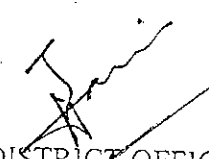
EXECUTIVE DISTRICT OFFICER  
ELE: & SECY: EDU: MANSEHRA

Endst: No. 1658-64 /AE-II.

Dated 30/06 / 2012

Copy to the:-

1. Secretary to Govt: of Khyber Pakhtunkhwa Peshawar.
2. Director E & S E Khyber Pakhtunkhwa Peshawar.
3. District Accounts officer Mansehra.
4. District officer (F) Local office.
5. Headmistress concerned.
6. PA to District coordination officer Mansehra
7. Candidate concerned.

  
DISTRICT OFFICER (FEMALE)  
ELE: & SECY: EDU: MANSEHRA

Muhammad Arshad Khan  
Distt: Courts Abbottabad



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6 Annex "D",

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA**

No: 7746 / Establishment/ 2014

Email: deofmansehra@yahoo.com

Dated: 28/9/2014

Phone & Fax: 0997-302518

**SHOW CAUSE NOTICE**

I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) rules, 2011, do hereby serve you Mst Saba Noor D/O Sheikh Noor Ellahi, Qaria, Govt. Girls High School Talhatta Mansehra, Show cause Notice as follows:

1) You were appointed as **Qaria** at GGHS-Talhatta, vide defunct Executive District Officer (E&SE) Mansehra Endst: No 893-942/Estt Qaria (D)/2012 Dated 16.06.2012 where you were stranger for recruitment process initiated through EATA: Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will & wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.

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

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

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

COMPETENT AUTHORITY

*Naghmana Sardar*  
District Education Officer  
(Female) Mansehra

*Attested*

*[Signature]*

*[Stamp]*

|                              |                  |  |   |
|------------------------------|------------------|--|---|
| 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 |
| Bano Baffa                   | GGHSS Baffa      | The Sanad issued by Trust Jammiat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment whereas the sanad e Hifz is <u>not from recognized institution.</u>  | The appointment is not valid and is against the recruitment rule/policy |
| Bibi Khal 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 |
| Maid D/O Maid                | 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 |
| Mameeda D/O Ahmad            | 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 |
| Babsum D/O Ahmad             | GGHS Traura      | Sanad Hifz ul Quran is from recognized institution but the Sanad issued by Trust Jammiat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment and Qirrat sand <u>not from recognized institution.</u> | The appointment is not valid and is against the recruitment rule/policy |
| Noor 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 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. |
|------------------------|-------------|--|---|

Attested  
 Muhamad Ananoli  
 Dist: Gurgaon

Annex A

1686-95 / AE / Dismissal  
3.3.05

3



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Annex "E"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Saba Noor D/O Sheikh Noor Elahi working as Q. No. GGHS/GGMS/GGP Baffra 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, Ushar and Social Welfare Department)
  - ii) Mr. Akhlaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause 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. Saba Noor D/O Sheikh Noor Elahi ET/PETATT Q. No. GGHS/GGMS/GGP Baffra

*[Handwritten Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

Endst: No. 1686-95 /AE- /Etab: dated 03/03/2015  
Copy to the:-

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

Attested

*[Handwritten Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

*[Handwritten Signature]*

Advocate  
Dist: Dera Ismail Khan

28

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

| Sl | Roll No | Name          | Father Name     | Post Applied for | Address          | D/O BIRTH  | DATE OF DEC. OF RESULT | ETEA Marks | Academic   |          |     |     |       |        |     |       |        |     | T/Fs |        |     |     |       |       |
|----|---------|---------------|-----------------|------------------|------------------|------------|------------------------|------------|------------|----------|-----|-----|-------|--------|-----|-------|--------|-----|------|--------|-----|-----|-------|-------|
|    |         |               |                 |                  |                  |            |                        |            | ETEA MARKS |          | SSC |     |       | FA/FSC |     |       | BA/BSC |     |      | MA/MSC |     |     |       |       |
|    |         |               |                 |                  |                  |            |                        |            | Tot        | Plage    | Obt | Tot | Plage | Obt    | Tot | Plage | Obt    | Tot |      | Plage  | Obt | Tot | Plage |       |
| 23 | 81      | TAHIRA NIAZ   | NIAZ MOHD       | QARIA            | ICHRIAN MANSEHRA | 12/10/1985 | 09/11/2004             | 132        | 300        | 17.6     | 361 | 850 | 6.371 | 0      | 0   | 0     | 0      | 0   | 0    | 0      | 0   | 0   | 23.97 |       |
| 24 | 275     | GHAZALA JAVED | MOHAMMAD JAVEED | QARIA            | MANSEHRA         | 17/05/1984 |                        | 124        | 300        | 16.53333 | 421 | 850 | 7.429 |        |     |       |        |     |      |        |     |     |       | 23.96 |
| 25 | 698     | SAIQA TABASUM | SAID ALAM       | QARIA            | GABDIAN MANSEHRA | 02/02/1977 | 28/03/1998             | 120        | 300        | 16       | 426 | 850 | 7.518 | 0      | 0   | 0     | 0      | 0   | 0    | 0      | 0   | 0   | 0     | 23.52 |

*A. Mehtab*

*Pa. A. D-O (Actual CF)*

*Jan*  
**DO (Female)**  
**IE & S) Edu: Mansehra**

*7/11/04*  
**A. D-O**  
**ETEA (CF)**

**Muhammad Anwar Khan Tareel**  
**Advocate**  
**District Courts Abbottabad**

قیمتی

کورٹ فیس

# وکالت نامہ

بعدالت KPK سرٹیفکیٹ لٹا اور

عنوان: صاحب خورشید مارہ بنام گورنمنٹ KPK ایجوکیشن بورڈ

منجانب: ایڈووکیٹ

نوعیت مقدمہ: ۱۳۱

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی وجواب وہی کل کارروائی متعلقہ آں مقام

شہزاد سید خان سنی ایڈووکیٹ چائی کورٹ ایبٹ آباد

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی 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 کارروائی 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 بمراد استجارت نالش بھینہ 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:

Attosha

M. Atosha  
Adv High Court Ad

Sebat Nour



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

Saba Noor D/O Shiekh Noor Ellahi Qaria (GGHSS Baffa) R/O  
Khan Bahadur 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 1686-95  
/AE-J/ESTB AND GRANT OF STATUS  
QUO TILL FINAL DISPOSAL OF THE  
MAIN APPEAL .**

Respectfully Sheweth,

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

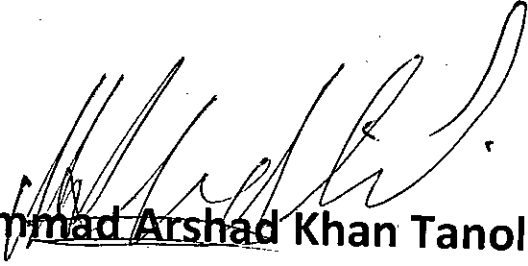
- applicant had required qualification/criteria for the said post and the applicant has not been contested by any one as there was no contesting rival candidate.
5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
  6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

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

Dated: -----/2015

Appellant

Through

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

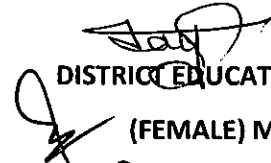
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.763/2015

Respectfully Shewth

1. That the services appeal No: 763/2015 in respect of MST: Saba Noor is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4248-53 /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  
ADO

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Saba Noor, Qaria at Government Girls High School Baffa District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1686-95 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. 21 of the merit list. Her asnad of Hifzul Quraan and Tajweel Quran was from Marassat ul Banat Taaleem ul Islam Mansehra. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.20.
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. 1686-95 dated 03/03/2015 and reinstate Ms. Saba Noor, Qaria, at Government Girls High School Baffa District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliations to the DEO (F) Mansehra.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4248-53 /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 with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Saba Noor, 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