

3

24.07.2015

Appellant Deposited
Security & Process Fee



Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 9.3.2015 which was not responded and hence the instant service appeal on 8.7.2015.

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

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



Chairman
Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Representative submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant has been reinstated in service.

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

Dismissed as withdrawn.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




Chairman
Camp Court A/Abad.
20/10/15

ANNOUNCED
20.10.2015

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 764/2015

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. Sabeen Bibi presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> 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> CHAIRMAN</p>

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no 764/2015

Sabeen Bibi D/O Muhammad Haroon (PST GGPS Shoukat Abad)
R/O Babral Maira 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"	12-20
4	Copy of appointment order and corrigendum	"C"	21-25
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	26-27
6	Copy of impugned dismissal order of appellant	"E"	28
7	Copy of departmental appeal /representation	"F"	29
8	Copy of merit list	"G"	
9	Wakalatnama		

Dated: 7/2015

Appellant

Through

Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 764/15 ①

N.W.F. Province
Service Tribunal
Diary No. 801
Date 8-7-2015

Sabeen Bibi D/O Muhammad Haroon (PST GGPS Shoukat Abad)
R/O Babral Maira Tehsil & District Mansehra

.....Appellant

VERSUS

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

.....Respondents

SERVICE APPEAL.

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

Respectfully Sheweth,

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

1. That, respondent No 3 announced the posts of 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"

8/7/15

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 Chajar Bala vide appointment order endrst No 5360-5384/ Estt ; PST 2011/2012 Mansehra Dated 18.05.2012. **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. 18.05.2012 onwards.
5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 2066-75/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 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

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endst. No 2066-75/AE./Estb dated 03.03.2015. **Copy of impugned dismissal order of appellant is attached as annexure "E".**

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 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 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 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

6

cannot be dismissed for the acts committed by the Ex-EDO.

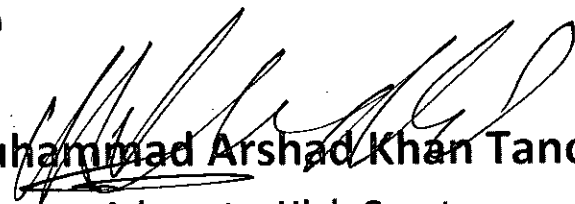
- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No _____/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: 27/3/2015


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

8

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Sabeen Bibi D/O Muhammad Haroon (PST GGPS Shoukat Abad)
R/O Babral Maira Tehsil & District Mansehra

.....Appellant

VERSUS

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

.....Respondents

APPLICATION FOR SUSPENSION
OF IMPUGNED ORDER NO ~~3-15~~³⁻³ 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: 7/3/2015


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

(10)

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Sabeen Bibi D/O Muhammad Haroon (PST GGPS Shoukat Abad)
R/O Babral Maira 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, Sabeen Bibi D/O Muhammad Haroon (PST GGPS Shoukat Abad) R/O Babral Maira Tehsil & District Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 7/5/2015


Deponent

Annex A

P-11

سری نمبر	موضوع	تاریخ	مقام	مقام نمبر	مقام نمبر	مقام نمبر
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Attested
 Muhammad
 Distt. Court, Abbottabad

148

0997-300254

S.NO.....

GOVERNMENT GIRLS COLLEGE NO.2 MANSEHRA



Annex B

P-12

PROVISIONAL CERTIFICATE

SESSION A(2008)

Roll No 26720

Admission No 450

This is to certify that Miss/Mrs SABEEN

Daughter of HAROON

has passed the BA

Examination from the H.U. MANSEHRA

Registration No 07-MSRC-II-86 Date of Birth 05-02-1988

Held in 2008 as a Regular/Late College Student

He/She obtained 288 Marks out of 550

Marks and was placed in SECOND Grade/ Division

She bears good moral character.

PROVISIONAL CERTIFICATE

- | | |
|------------------------------|-------------------|
| 1. <u>PAKISTAN STUDIES</u> | 4. <u>LAW</u> |
| 2. <u>ENGLISH COMPULSORY</u> | 5. <u>Altered</u> |
| 3. <u>ISLAMIC STUDIES</u> | |

Prepared by _____

Checked by _____

Date of Issue 1-9-2008

Altered

Principal

Govt. Girls College No 2

MANSEHRA

Govt. Girls College No 2

Mansehra.


AMER SIDDIQUI

SECRETARY

G.M.S. BUBALAN

S.No: 206047855

Roll No: 47855


BOARD OF INTERMEDIATE & SECONDARY EDUCATION
ABBOTTABAD - N.W.F.P. PAKISTAN
INTERMEDIATE EXAMINATION
PROVISIONAL CERTIFICATE
SESSION 2006 (Annual)

P-13

THIS IS TO CERTIFY THAT Sabeen

Daughter of Haroon

student of Mansehra District

has passed the *Higher Secondary School Certificate Examination* of the Board of Intermediate & Secondary Education, Abbottabad held in *May/June, 2006* as a *Private* candidate. She obtained 705 marks out of 1100 and has been placed in Grade "B"

The Candidate passed the following subjects.

- 1. Urdu
- 2. English
- 3. Islamic Edu. & Pak Studies
- 4. Islamic History
- 5. Islamic Studies
- 6. Arabic

Registration No: 0391AB/MA-IntF05

Checked by [Signature]

Computer Section BISE,ATD

Attested
 [Signature]
 BOARD OF INTERMEDIATE & SECONDARY EDUCATION
 Abbottabad

[Signature]
 Asstt: Secretary (Certificate)

Date of Issue: August 05, 2006

Attested
 [Signature]
 JAVED KHAN
 S.E.T BPS-17
 G.M.S Subrai Mansehra
 Distt: Courts Abbottabad

ADA No 148326

Roll No. 56575

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



P-14

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

This is to certify that SABEEN

Son/Daughter of HAROON

A candidate from GOVT. GIRLS HIGH SCHOOL AFZALABAD MANSEHRA

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in March 2004 as a Regular/Private Candidate. He/She obtained 505 marks out of 850 and has been placed in Grade C Representing GOOD.

The candidate passed in the following subjects.

- | | | | |
|------------|---------------|-----------------|----------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS | 6. G. SCIENCE | 7. ISL: STUDIES | 8. MBH |

Date of Birth according to admission form is FIFTH FEBRUARY

One Thousand Nine Hundred and EIGHTY-EIGHT (05-02-1988)

Asstt Secretary

This certificate is issued without alteration or erasure

Secretary

Handwritten scribble in the top left corner.

P-15

S.No. 001644

Roll No. 544

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

ABBOTTABAD - N.W.F.P. PAKISTAN

PROVISIONAL CERTIFICATE

ORIENTAL FACULTY

SESSION 2006



This is to certify that

Sabeen

Son/Daughter of

HARON

and a candidate of the

Maujehra

Registration No.

M. 009016

has passed the

Honours

Examination of the BOARD OF INTERMEDIATE & SECONDARY EDUCATION-ABBOTTABAD held in

Sept 2006

He/She obtained

295

Marks and has been placed in

II

Division

The Examination was taken as whole/in parts

Prepared by:

[Signature]

Checked by:

[Signature]

Date of Preparation

02/10/07

Assistant Secretary (Certificates)

[Signature]

M.L.

[Signature]

MAJID HAN

JAVED HAN

SET BPS

G.M.S. Bujrali Ma

Allama Iqbal Open University Islamabad

Serial No

189701



P-16

Certified that *Mr/Ms* **SABEEN**

Son/Daughter of **KAROON**

Registration No **07-NMA-1633**

Roll No **Z-647496**

Semester **Spring 2008**

having met all the requirements

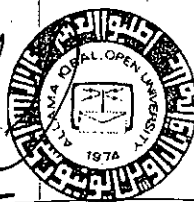
under the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured **72 %** marks

and has been placed in **A** grade

Attested



Attested
JAVED KHAN
SE/BPS-17
G.M.S. Baital Manshra

Result declared on: **March 14, 2009**

Date of issue: **November 06, 2009**

Controller of Examinations

Attested

Controller of Examinations

Note: This certificate is issued without alteration/erasure.
The detail of courses is overleaf.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



PROVISIONAL RESULT CARD

Serial No. 640198

Name SABICEN
 Father's Name HAROON
 Address BUBRAL MARA P/O SHOUKAT ABAD

Roll No. AU697271
 Registration No. 07NMA1633
 Final Semester SPR-2014

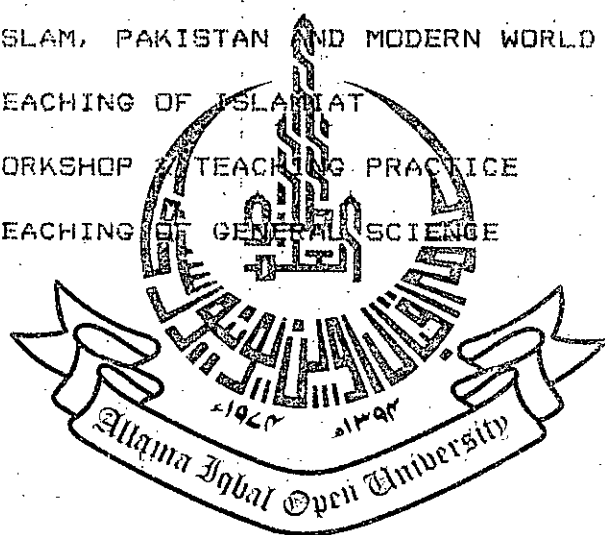
Tehsil MANSEHRA
 District MANSEHRA

has successfully completed BACHELOR OF EDUCATION (B. ED)

P-17

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 13	0512	PERSPECTIVES OF EDUCATION	100	62
AUT- 13	0513	SCHOOL ORGANIZATION	100	66
AUT- 13	0514	EVALUATION, GUIDANCE & RESEARCH	100	61
AUT- 13	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	70
AUT- 13	0651	ENGLISH (COMPULSORY)	100	59
AUT- 13	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	67
SPR- 14	0654	TEACHING OF ISLAMIAT	100	65
SPR- 14	0655	WORKSHOP IN TEACHING PRACTICE	100	81
SPR- 14	0657	TEACHING OF GENERAL SCIENCE	100	62



[Signature]
 SET BPS-17
 G.M.S. Bibrar Manshra

CREDITS: 6

Total Marks / Obtained

900 / 593

Result Declared on JANUARY 16, 2015

Percentage / Grade

66 B

Date of issue JANUARY 20, 2015

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

[Signature]
 Muh. ...
 Dist. Centre Abbottabad

Serial No. 005290



Registration No. 07-MSRG-II-86

Roll No. 30127

HAZARA UNIVERSITY

Mansehra, Pakistan



P-18

Attested

[Signature]
Distt. Courts Abbottabad

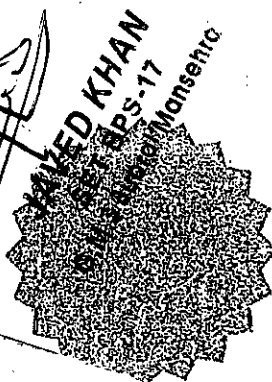
The University in recognition of the fulfilment of prescribed requirements has conferred upon

Mr / Ms Sabeen Son / Daughter of Haroon

The Degree of **MASTER OF ARTS** in Islamiyat
in the examination held in August, 2013 session Annual 2013 (Private)

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

The examination was taken as a Whole / Inparts.



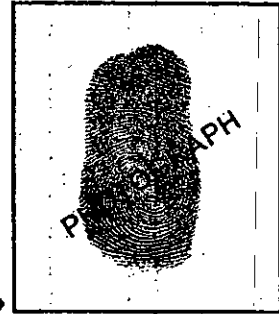
[Signature]
Controller of Examinations
Date 26-Feb-2014

[Signature]
Vice Chancellor

[Signature]
Registrar

DOMICILE CERTIFICATE

NWFP DISTRICT MANSEHRA



P-19

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

I was born at Village/Mohallah BABRAL MAIRA

Tehsil MANSEHRA District MANSEHRA Hazara Division

Sabeen
Signature of Applicant

Date 17-08-2006

Pursuance of the Declaration date _____

Filled by Mr./Miss./Mrs. SABEEN

S/D/W/O HAROON

Domiciled in North West Frontier Province, it is hereby certified that the said APPLICANT is born of parents who are/were/permanent residents of the North West Frontier Province, having been born/settled within it.

I have satisfied myself from ~~personal/my~~ knowledge verification that the above deceleration is true and certify accordingly

This 19th day of August 2006

Countersigned
DISTRICT OFFICER
REVENUE & ESTATE
[Signature]
Mansehra

[Signature]
DEPUTY DISTRICT OFFICER
REVENUE & ESTATE

JAVED KHAN
SET
G.M.S. Buzdar
Mansehra

تعداد کی جاتی ہے مسماہت میں جس کی رقم رقم ہزاروں
 20-P حجم تنوی مکان بھرا دیا داخلہ و فیہ افضل آباد
 تحصیل و قلعہ کی پیدائشی آبادی تعداد سے پیدائشی
 رہائشی دستاویزی ہے . H. Aslam

خواب عالی

صوبہ تھریٹ علی امیر خیر کونسلر C / لا شوق آباد ۱۰۰۰ مسماہت میں دختر محمد طارق قوم تنوی
 مکان بھرا داخلہ افضل آباد تحصیل انصاف مانہہ صوبہ بھرا آبادی اور اس سے پیدائشی رہائشی
 دستاویزی ہے . مائة نڈو کا والد صوطیہ افضل آباد اراضی کھاتا $\frac{412}{1120}$ میں کھاتا ہے ۔

17/8
 06

۱۹۱۵۰۶

۱۹۱۵۰۶

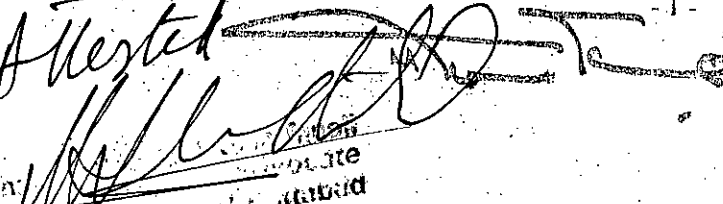
P-21

Ames. "C"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRAORDER

Consequent upon the recommendation of the Departmental Selection Committee, District Mansehra, 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	Shagufa Bibi	Muhammad Shafi Khan	Battal	Own UC M/List
6	Shaista Jabeen	Muhammad Akbar	Kathai	From Adjacent UCs Merit list
U/C Bherkund				
7	Bushra	Ghulam Mustafa	Bhekund	Own UC M/List
U/C Gari Habib Ullah				
8	Naida Ashraf	Muhammad Ashrif Bag	Gari Habib Ullah	Own UC M/List
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	Own UC M/List
U/C Hilkot				
10	Bibi Asin	Abdul Ghafoor	Hilkot	Own UC M/List
U/C Hangrai				
11	Inam Saeed	Saeed Akhtar	Hangrai	Own UC M/List
12	Marium Bibi	Muhammad Younis	Hangrai	Own UC M/List
U/C Ichrian				
13	Bibi Sajida	Saeed ur Rehman	Ichrian	Own UC M/List
14	Saima Ara	M.Fareed Khan	Ichrian	Own UC M/List
U/C Jabar Daveli				
15	Mah 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 Afzal	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

Stested

 District Executive Officer
 Mansehra

P-22

U/C Lissan Nawab				
29	Sobia Arshad	Muhammad Arshad	Lissan Nawab	Own UC M/List
30	Rashida Bibi	M. Zahoor	Lissan Nawab	Own UC M/List
U/C Mohandari				
31	Bibi Nasceema	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	Tuhira Jabeen	Muhammad Ayub	Sawan Maira	Own UC M/List
U/C Shanaya				
44	Safoora Farat	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	Own UC M/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	Tabasam 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. Yousuf 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	Shaista Jabeen	Muhammad Akbar	Kathia	GGPS Chandni	A/V/Post

Muhammad Akbar
 District Courts, Abbottabad

8	Bushra	Ghulam Mustafa	Bhekund	GGPS Kehnan Mian	A/V/Post
9	Naida Ashraf ✓	Muhammad Ashrif Bag	Gari Habib Ullah	GGPS Danna Ganaila	A/V/Post
10	Gul Naz Bibi ✓	S. Qabal Shah	Gari Habib Ullah	GGPS Chuntri	A/V/Post
11	Bibi Asia ✓	Abdul Ghafoor	Hilkot	GGPS Khan Balimang	A/V/Post
12	Irum Saeed	Saeed Akhtar	Hungrai	GGPS Kalas Ghanaila	A/V/Post
13	Marium Bibi	Muhammad Younis	Hangrai	GGPS Kalas Ghanaila	A/V/Post
14	Bibi Sajida ✓	Saeed ur Rehman	Ichrian	GGPS Karmang Payeen	A/V/Post
15	Saima Ara	M. Fareed Khan	Ichrian	GGPS Ramsera	A/V/Post
16	Mah Jabeen	Muhammad Farooq	Jabar Daveli	GGPS Baso Manda Gucha	A/V/Post
17	Saba Tariq ✓	Muhammad Tariq	Sachan	GGPS Baso Manda Gucha	A/V/Post
18	Sobia Bibi	Abdul Ghafoor	Jaloo	GGPS Talian Di Kasi	A/V/Post
19	Saima Naz ✓	Mir Afzal	Jaloo	GGPS Chor Banda	A/V/Post
20	Fara Naz	Muhammad Khurshid	Karnol	GGPS Bhoraj	A/V/Post
21	Nadia Rehman ✓	Habib ur Rehman	Pairan	GGPS Dheri Sohail	A/V/Post
22	Amrin Younis	Muhammad Younis	Karori	GGPS Seri Malwal	A/V/Post
23	Musrat Bibi	Khalil ur Rehman	Karori	GGPS Malhar	A/V/Post
24	Zenab	Alam Zeb	Karori	GGPS Malhar	A/V/Post
25	Amrin Kusar	Muhammad Miskeen	Karori	GGPS Fata Bandi	A/V/Post
26	Rukhsana Taj	Taj Muhammad	Karori	GGPS Fata Bandi	A/V/Post
27	Rifat Bibi ✓	Faqeer Muhammad	Shanaya	GGPS Naryala	A/V/Post
28	Ashia ✓	Misri Khan	Shanaya	GGPS Thiakra	A/V/Post
29	Razia Bibi	Muhammad Zaman	Darband	GGPS Dhok	A/V/Post
30	Sobia Arshad	Muhammad Arshad	Lassan Nawab	GGPS Sharota	A/V/Post
31	Rashida Bibi ✓	M. Zahoor	Lassan Nawab	GGPS Chapra Bala	A/V/Post
32	Bibi Naseema	Ghulam Nabi	Mohandari	GGPS Badal Gran	A/V/Post
33	Yasmeen Wahab	Abdul Wahab	Nika Pani	GGPS Cham	A/V/Post
34	Neelam	Abdul Latif	Darband	GGPS Cham	A/V/Post
35	Lubna Younis	M. Younis	Perhinna	GGPS Phalkot	A/V/Post
36	Zahida Bano	Ali Zaman	Perhinna	GGPS Phalkot	A/V/Post
37	Bibi Saleha	Abdula Jan	Phulra	GGPS Ghazikot	A/V/Post
38	Mehnaz Bibi	M. Iqbal	Phulra	GGPS Dhaman	A/V/Post
39	Bibi Mewash ✓	M. Naveed	Phulra	GGPS Ghazikot	A/V/Post
40	Farzana Yousaf	M. Yousaf	Phulra	GGPS Batangi	A/V/Post
41	Bibi Farah ✓	Khurshid Khan	Sawan Maira	GGPS Gojar Gali	A/V/Post
42	Bibi Salama	Shezada Khesro Faredon	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/Post
43	Bibi Norin	Rehmat Ullah	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/Post
44	Tahira Jabeen	Muhammad Ayub	Sawan Maira	GGPS Mohar	A/V/Post
45	Safoora Farat	Abdul Razaq	Shanaya	GGPS Numshera Shahkot	A/V/Post
46	Irum Shaheen	Anwar Khan	Shanaya	GGPS Numshera Shahkot	A/V/Post
47	Saeeda Haidar ✓	Mir Hajdar	Shergarh	GGPS Gakharh	A/V/Post
48	Fozia Bibi ✓	Sher Bahadar	Shergarh	GGPS Perchaian	A/V/Post
49	Sadia Gul	M. Zaman	Shergarh	GGPS Perchaian	A/V/Post
50	Asma ✓	Abdul Malik	Darband	GGPS Shorolian	A/V/Post
51	Sadia Javed	Javed Khan	Shuakat Abad	GGPS Lalan Da Darra	A/V/Post
52	Sabeen	M. Haroon	Shuakat Abad	GGPS Chajar Bala	A/V/Post
53	Tabasam Rashid	Abdul Rashid	Shuakat Abad	GGPS Paniyali	A/V/Post
54	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post
55	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post
56	Sidra Hamayun ✓	M. Hamayun	Trangri Sabir Shah	GGPS Khari Patoi	A/V/Post
57	Salma Javed ✓	Muhammad Javed	Darband	GGPS Pagora	A/V/Post
58	Noshin Bibi ✓	Fazal ur Rehman	Darband	GGPS Beer Bat	A/V/Post
59	Sahibzadi Azmat Rehani ✓	Ghulam Rabani	Tanda	GGPS Talian Manda Gucha	A/V/Post
60	Asma Noreen ✓	Nawab Khan	Dhodial	GGPS Kothri	A/V/Post

TERMS & CONDITIONS:

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

Attested

[Signature]
 District Council Abbottabad

P-24

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

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

Endst: No. 5360-5384 /Estt: (F)Apptt:PET(F)/2011-12 Dated Mansehra the 18th 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, Mansehra.
- 4-5. District Officer (M&F) Local Office.
6. Deputy District Officer (Female) E&SE Mansehra.
7. PA to District Coordination Officer, Mansehra.
8. Budget & Accounts Officer, local office, Mansehra.
- 9-67. Candidates concerned.

Attested

EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

[Handwritten Signature]

P-25

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDU: MANSEHRA.

ORDER.

Consequent upon the approval of competent authority, that the following PST are hereby transferred on their own pay and grade in the interest of public service with immediate effect.

S.No	Name of Teacher	From	To	Remarks
1. ✓	Sabeen Bibi PST	GGPS Chajar	GGPS Tatar Syedan	V.N.2
2.	Saira Ali PST	GGPS Tatar Syedan	GGPS Treda	A.V.P
3.	Bibi Shakeela PST	GGPS Lalan Da Darra	GGPS Treda	A.V.P
4. B	Gul Bibi PST	GGPS Sukian	GGPS Lalan Da Dara	V.N.3

Note:-

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

Sd/-
EXECUTIVE DISTRICT OFFICER
E & S EDUCATION MANSEHRA

Endst: No 1392-98 /GB/PK-55/DDO(F)

Dated 24 /10/2012.

Copy to the:-

1. ADO Circle Concerned.
2. DEMIS Branch Local office.
3. Head Teacher.
4. Teacher concerned.

[Signature]
24/10/12
DY: DISTRICT OFFICER (F)
E&S EDUCATION MANSEHRA

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



^D
Annex-26

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. -7776- / S. Cause
Dated the 29/9/ 2014

Email: deofmansehra@yahoo.com
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. Sabeen PST GGPS Chajar Mansehra Show cause Notice as follows:

1) You were illegally appointed as PST at GGPS Chajar vide defunct Executive District Officer (E&SE) Mansehra, 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 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.

- Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
 - Inflicted huge financial losses to the Govt. Treasury receiving pay as result of bogus appointment.
 - By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for unlawful appointment with collusion of then EDO.
- 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.
 - 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.
 - If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-party action shall be taken against you.
 - A copy of the finding inquiry committee related page is enclosed.

Attested

COMPETENT AUTHORITY

Mst. Sabeen

GGPS Chajar

Muharrar

Mansehra
District Council, Abbottabad

از: مسیون پی ایس سی، دفتر عارضین ساکن، میرا بہرہ راول پور میں کونسل شوکت آباد
برنامہ: ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ (زبانہ) مدارس حاشیہ

مضمون:- شوکارا نوٹس

یادداشت: حوالہ آمدہ از دفتر (DEOLF) حاشیہ شوکارا نوٹس لکٹر نمبر 7776
مورخہ 29/09/14ء جواب ارسال خدمت ہے

- 1- میری بھرتی حالتاً بدتر اور پالیسی کے مطابق ہوئی ہے۔
- 2- میں نے گورنمنٹ کو کسی قسم کا نقصان نہیں پہنچایا۔ سروس کے دوران میں نے اپنی ڈیوٹی مکمل طور پر سر انجام دی ہے۔ اور کئی ٹی ڈیوٹی پھیر دینی تھی وہ سہول کی ہے۔
- 3- میں نے مکمل طور پر Test اور انٹرویو پاس کیا ہے اور کسی سے کوئی حقارت نہیں چھپائے۔ اور نہ ہی کسی کا حق مارا ہے۔ میں ساکن میرا بہرہ راول پور میں کونسل شوکت آباد کی رہائشی ہوں۔ میری بھرتی عنقریب پورے کونسل شوکت آباد میں ہونی چاہیے تھی۔ شوکت آباد میں میرٹ لیٹ پورے کونسل میں دوسرے نمبر تھی جبکہ پورے کونسل میں ہی میرا پی ایس سی پورٹ موجود تھی جبکہ میرا آڈر 11اں کھٹائی میں کیا گیا جو کہ میرے ساتھ زیادتی تھی۔ دوسرے میں میرا تمام ریکارڈ موجود ہے۔ اور اب میں اپنی 11اں شوکت آباد میں قانونی طریقے سے تبدیلی سر کے ڈیوٹی سر انجام دے رہی ہوں۔

4- میری بھرتی تمام قانونی ضابطے کے مطابق ہوئی ہے۔ اور شوکارا نوٹس کا حشر میری جواب ارسال خدمت ہے۔ لہذا میرا پی ایس سی حاشیہ اس شوکارا نوٹس سے منتفی کیا جائے۔ میں اب اپنی 11اں شوکت آباد جی جی پی ایس شوکت آباد تیار میدان میں ڈیوٹی سر انجام دے رہی ہوں۔
جناب عالیہ میرے ڈسپلنری نوٹس کے مطابق میرا ٹیسٹ سٹاک لف جیتا

Attested

[Handwritten Signature]

Distt. Board

مسیون عارضین پی ایس سی ٹورنگ سٹریٹ راول پور
مستقل تیار میدان راول پور



Annex E

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

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

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 2066-75 /AE- //Estab: dated 03/03 /2015.

Copy to the:-

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

[Signature]

Mut *[Signature]*
Distt: Mansehra

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

محضوٰر جناب ڈائریکٹر صاحب ایلیمنٹری اینڈ سیکنڈری ایجوکیشن، پشاور محکمانہ ایپل بر خلاف حکم فاضل آفیسر ماتحت ڈسٹرکٹ ایجوکیشن آفیسر

Annex F (زنانہ) مانسہرہ

آرڈر نمبر از رولمنٹ نمبر B-66-75 مورخہ 3-3-2015

جناب عالی! P-29

Dairy No = 1446 Date = 10-03-2015

ایپل ذیل عرض ہے:-

Director Peshwar office:-

۱۔ یہ کہ ایپلائٹ گاؤں بہراں میرا تحصیل و ضلع مانسہرہ کی رہائشی ہے۔

۲۔ جناب عالی میری نوکری بحوالہ آرڈر نمبر (F) 2011-2012 Est Appt: PET (F) 5360-5384 Endt No.5360-5384

تاریخ 18-5-2012 باقاعدہ میرٹ کے مطابق ہوا ہے۔ اخباری اشتہار کے مطابق ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) کے مطابق باقاعدہ ایٹاٹ پاس کیا اور انٹرویو دیا اور اپنی تمام اسناد انٹرویو کمیٹی کے سامنے پیش کیں۔

۳۔ اور اس طرح تمام محکمانہ کارروائی مکمل کرنے کے بعد میرٹ لسٹ دفتر میں اویزاں کی گئی میرٹ لسٹ میں UC شوکت آباد میں میرا نمبر دو (2) تھا۔ جبکہ کل تین امیدوار کو تعینات کیا گیا۔

۴۔ جناب عالی اخباری اشتہار کے وقت ہماری UC میں تین عدد آسامیاں خالی تھیں۔

(۱) GGPS پنیالی (۲) لعل دا درہ GGPS (۳) لعل دا درہ GGPS

۵۔ ان خالی آسامیوں پر (جاری پراسس کے دوران) UC شوکت آباد کے باہر سے دوسری UC سے ٹرانسفر کر کے ان خالی آسامیوں کو فل کر دیا گیا۔

۶۔ مثلاً ایک ٹیچر کو GGPS کنڈبالا کوہستان سے آرڈر نمبر 2599/2602 مورخہ 16-9-2011 کو خالی UC شوکت آباد (پنیالی) پر آرڈر کر کے خالی آسامی کو فل کر دیا گیا۔

۷۔ اور اسی طرح لال درہ GGPS میں دوسری جگہوں سے تعیناتی کر کے UC شوکت آباد میں موجود ان خالی آسامیوں کو پر کر دیا گیا۔ جو کہ ہمارے ساتھ سراسر نا انصافی تھی۔

جناب عالی!

۸۔ بھرتی کے پراسس کے دوران جبکہ اشتہار شائع ہو چکا ہو۔ ان خالی آسامیوں پر UC سے باہر سے آرڈر کر کے نئے آنے والے امیدواروں کا حق چھینا کہاں کا انصاف ہے۔

۹۔ جناب عالی تمام محکمانہ کارروائی مکمل کرنے کے بعد مجھے جو پہلا آرڈر ملا Own UC میرٹ لسٹ کے ساتھ ایپل رولمنٹ آرڈر

(GGPS Charjar Bala avd) تعینات کیا گیا۔

Attested
Director Peshwar office
Peshwar

P-30

۱۰ جناب عالی میں نے 21-5-2012 کو GGPS Charjar Bala میں حاضری کر لی اور 30-10-2012 تک اپنے ٹیچنگ کے فرائض بخوبی ادا کرتی رہی۔

جناب عالی مورخہ 24-10-2012 کو مجھے آرڈر نمبر (F) Eno/S/No 1392-98/GB/Pk55/DDO کے تحت Charjar Bala سے تاتار سیداں UC شوکت آباد ٹرانسفر کر دیا گیا۔ اور میں نے 31-10-2012 کو تاتار سیداں میں حاضری کر لی اور مورخہ 3-3-2015 تک اپنے فرائض ڈیوٹی GGPS تاتار سیداں میں انجام دیتی رہی ہوں۔ اسامی پر تعیناتی کے بعد میں نے اب تک تقریباً تین سال سروس کے مکمل کر لیے ہیں۔

۱۱ جناب عالی میری UC میں جو تین عدد آسامیوں پر آرڈر کیے گئے ان میں سے میرٹ پر آنے والی پہلے نمبر پر اور تیسرے نمبر پر آنے والی لڑکیوں کا UC میں آرڈر تو جاری کیا گیا لیکن ان کی بھی حاضری UC سے باہر ہوئی۔ اگر وہ اپنی سروس پر بحال ہیں تو مجھے کیوں سروس سے Dismiss کیا گیا ہے۔ یہ میرے ساتھ نا انصافی ہے۔ میری UC شوکت آباد سے باہر (ملحقہ UC شمدڑہ) آرڈر کرنے کا ذمہ دار ایجوکیشن آفیسر اور متعلقہ عملہ ہے۔ جبکہ اس غلطی پر مجھے الزام دیا جا رہا ہے۔ جناب عالی اس کے علاوہ اگر میری تعیناتی میں کوئی بے قاعدگی ہوئی ہے تو میرا اس سے کوئی تعلق نہیں۔

لہذا آپ سے استدعا ہے کہ مذکورہ Dismissal Order کو کالعدم قرار دیا جائے اور مجھے اپنی سروس پر بحال رکھا جائے۔ میں اس پر آپ کی بلند اقبالی کے لیے ہمیشہ ڈعا گور ہوں گی۔

مورخہ

سین بی بی دختر محمد ہارون

9-03-2015

سین بی بی دختر محمد ہارون
سکنہ بہرال میرا، ضلع و تحصیل مانسہرہ

Attested

M. A. Tanoli
Advocate
Distt. Courts Abbottabad

قیمتی

کورٹ فیس

وکالت نامہ

بعدالت KDK سرویس گزٹیل لیتا اور

عنوان: سب سے کی بی آر ڈی نام گورنمنٹ KDK ایجنسی

منجانب: رسیدہ

نوعیت مقدمہ: رسل

باعث تحریر آنکہ

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

محمد اسد خان منوئی انٹرویو کے حاکمی کے ریسٹ اور

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

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

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

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

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

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

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

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

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

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم:

بمقام:

Attested

M. Asad Khan Tanali

Adv High Court Attd

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.764/2015

Respectfully Shewth

1. That the services appeal No: 764/2015 in respect of **MST: Sabeen Bibi** is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4058-63/F.No.79/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

- 101

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

NOTIFICATION.

WHEREAS, ~~Mst. Sabeen, PST~~ at Government Girls Primary School Chajar Bala District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 2066-75 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 Shoukat Abad where three posts of PST were lying vacant. She was at S.No.02 of the Merit list of her U/C under ETEA R. No. 1700319 and was appointed vide Endst No.5360-84 dated 18/5/2012 at Sr.No.51 in her own U/C but wrongly adjusted in other at GGPS Chajar Bala U/C Kathai instead of her own U/C.
2. ~~Appeal may be accepted as she was on merit. She is required to be adjusted in her own U/C according to merit. However, if she is comfortable with her posting, she may be allowed to continue as usual.~~


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. 2066-75 dated 03/03/2015 and reinstate Ms. Sabeen PST at Government Girls Primary School Chajar Bala District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4658-63 /F.No. ___ /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