


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 11.3.2015 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.

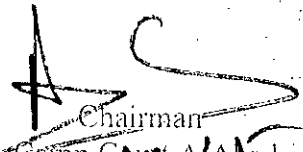
  
Chairman  
Camp Court A/Abad

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Dismissed as withdrawn.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. 787/2015

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. Sahinzadi Azmat Rabani presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	18-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

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

Appeal No. 787/2015

Sahibzadi Azmat Rabani d/o Ghulam Rabbani GGPS, Tanda  
Mansehra R/o Latewil P.O Bajna 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

**INDEX**

S.No	Prescription of Document	Annexure	page
1	APPEAL		1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12-24
4	Copy of appointment order and corrigendum	"C"	25-28
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	29-30
6	Copy of impugned dismissal order of appellant	"E"	31
7	Copy of departmental appeal /representation	"F"	32
8	Wakalatnama		

Dated: 15/11/2015

*[Signature]*  
Appellant

Through

*[Signature]*  
**Muhammad Arshad Khan Tanoli**

Advocate, High Court

Abbottabad

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

Appeal no 787/15  
①

S.W.F. Province  
Service Tribunal  
Diary No. 787  
Date 8/7/2015

Sahibzadi Azmat Rabani d/o Ghulam Rabbani GGPS, Tanda  
Mansehra R/o Latewil P.O Bajna 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"**

Sahibzadi Azmat Rabani  
8/7/15

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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 vide appointment order endrst No 5360-5384/ Estt ; PST 2011/2012 Mansehra Dated 18.5.2012. **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. 18.5.2012 onwards.
5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 2106-15/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

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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 2106-15/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 11.3.2015. **Copy of departmental appeal /representation is attached as annexure "F"** but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

### **GROUND**

- a. That, the appellant fulfilled the criteria of appointment as PST being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed on the merit list.12
- b. Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

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- c. 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.
- d. 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.
- e. 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,



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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.

- f. 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.
- g. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- h. 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.
- 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

5

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

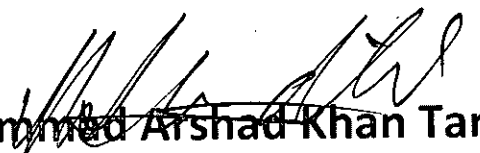
- j. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 2106-15/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: 2/7/2015

  
Appellant

Through

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

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

Sahibzadi Azmat Rabani d/o Ghulam Rabbani GGPS, Tanda  
Mansehra R/o Latewil P.O Bajna 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 2106-**  
**15/AE /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) 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

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

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

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

Dated: 7/5/2015

  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**

Advocate, High Court  
Abbottabad

10

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

Sahibzadi Azmat Rabani d/o Ghulam Rabbani GGPS, Tanda  
Mansehra R/o Latewil P.O Bajna 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, Sahibzadi Azmat Rabani d/o Ghulam Rabbani GGPS, Tanda Mansehra R/o Latewil P.O Bajna 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: 2/7 /2015

  
Deponent

Sl. No.	Item Name	QTY	Unit	Rate	Amount
1	...	2	...	...	...
3	...	4	...	...	...
5	...	6	...	...	...
7	...	3	...	...	...
8	...	10	...	...	...

**Pre Bid Meeting**  
 تاریخ: 31-5-2011  
 وقت: 11:00 بجے  
 مقام: ...

- (1) ...
- (2) ...
- (3) ...
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Sl. No.	Item Name	QTY	Unit	Rate	Amount
1	...	2-7	...	...	...
2	...	4-7	...	...	...
3	...	6-7	...	...	...
4	...	9-7	...	...	...
5	...	11-7	...	...	...
6	...	14-7	...	...	...
7	...	19-7	...	...	...

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تمہار  
 ANNEX  
 A  
 P-11

Muhammad Arshad Khan Tanoli  
 Advocate  
 Distt: Courts Abbottabad

33922

P-12  
Annex - B

(4)

DMC  
3/1/77

GG. No.

Board of Intermediate & Secondary Education  
ABBOTTABADDETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)Session 19 97 (Annual/Supplementary)Name Azmat Rabbani  
Father's Name Ghulam Rabbani Roll No. 3614

SUBJECT	Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. English	150	77	
2. Urdu	150	76	
3. Islamiyat Comp:	75	59	
4. Pakistan Studies	75	55	
5. Gen. Mathematics	100	33	
6. General Science	100	63	
7. <u>NB#</u>	100	47	
8. <u>B</u>	100	68	
<b>Total</b>	<b>850</b>	<b>478-C</b>	<b>Four Hundred &amp; Seventy Eight</b>

This Certificate is issued errors and omission excepted.

Prepared by: AChecked by: MDate 17 JUN 1997Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Attested

Muhammad Arshad Khan Tanoli  
Advocate  
Distt: Courts Abbottabad

Muhammad Arshad Khan Tanoli  
Advocate  
Distt: Courts Abbottabad

P-13

پیشہ ۱۱/۱۱/۱۱

Serial No. 343 Duplicate - Group Arts

Govt: Girls High School Baffa (Mansehra)

PROVISIONAL CERTIFICATE

This is to certify that S - Azmat Rabbani daughter of S - Ghulam Rabbani who appeared at the Secondary School Examination held in 1997 under Roll No. 3814 has been declared successful securing 478 marks with Letter Grade C according to the Result Statement supplied by the Controller of Exams. B.I.S.E. Abbottabad.

She passed in the following subjects:

- |                                 |                      |                      |                        |
|---------------------------------|----------------------|----------------------|------------------------|
| (1) Urdu ✓                      | (2) English ✓        | (3) Islamiat ✓       | (4) Pakistan Studies ✓ |
| (5) G. Math/El/Math ✓           | (6) G. Sc./Biology ✓ | (7) Physics/Civics ✓ |                        |
| (8) Chemistry/Islamic Studies ✓ | (9) <u>M B H</u>     | (10) _____           |                        |

According to the school record her date of birth is (08-03-1979)

Eight March N.H of Seventy and Internal Assessment Letter Grade is C  
nine -

N.B. This certificate is being issued to her only with the object of enabling her to be admitted to a college and is not to be held equivalent to the certificate to be issued to her by the Secretary, B.I. & S. Edu. ....in due course of time.

Dated. 18-3-2002.

Prepared by - Zahida

C. S. S. S. S.  
Principal  
Head of Institution  
BAFFA (Mansehra)

T. L. L. L. L.  
Superintendent  
Executive Distt. Officer  
Education Mansehra.

Attested

Muhammad Tanoli  
Advocate  
Distt: Courts Abbottabad



ADA 027960

Roll No. 3614

P-14

Handwritten signature/initials

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**  
**Abbottabad N.W.F.P. Pakistan**  
**Secondary School Certificate Examination**  
SESSION ANNUAL 1997



THIS IS TO CERTIFY THAT AZMAT RABBANI.  
Son/Daughter of GHULAM RABBANI.  
and a student of GOVT: GIRLS HIGH SCHOOL BAFFA.  
has passed the Secondary School Certificate Examination of the Board of  
Intermediate and Secondary Education, Abbottabad held in March 1997.  
as a *Regular/Private candidate*. He/She obtained 478 Marks out of 850  
and has been placed in Grade C Representing GOOD

The Candidate passed in the following subjects.

- |            |                     |            |                |
|------------|---------------------|------------|----------------|
| 1. English | 3. Islamiyat        | 5. G.MATHS | 7. G.SCIENCE   |
| 2. Urdu    | 4. Pakistan Studies | 6. M.B.H.  | 8. ISL:STUDIES |

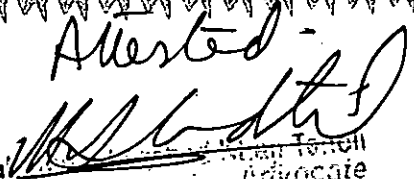
He/She has been awarded Grade B on the basis of internal  
assessment by the Institution concerned.

Date of birth according to admission form is EIGHTH FEBRUARY,  
one thousand nine hundred and SEVENTY NINE ( 08-02-1979 )

  
Asst. Secretary

  
Secretary

This certificate is issued without alteration or erasure.

Attested  
  
Advocate  
Distt. Court, Abbottabad

P-15 ⑤

# Board of Intermediate & Secondary Education ABBOTTABAD

## DETAILED MARKS CERTIFICATE Intermediate Examination (Humanities Group) Part - II



ایف.ری  
DMC

S. No: A 82960 Session 200 0 (Annual/Supplementary)

Name Sahibzadi Azmat Rabbani  
Father's Name Sahibzada Ghulam Rabbani Roll No. 1860

SUBJECT	Subjects Marks	MARKS OBTAINED				REMARKS
		Part - I	Part - II	Total in		
				Figures	Words	
1. English	200			74		Five hundred & Sixty five
2. Urdu	200			101		
3. Islamic Education	50			62		
4. Pakistan Studies	50					
5. <u>1H</u>	200			109		
6. <u>IS</u>	200			145		
7. <u>UA</u>	200			74		
<b>Total</b>	<b>1100</b>			<b>565</b>	<b>C</b>	

Note: Errors/Omissions excepted

Date 08 JAN 2001  
Prepared by: \$ Checked by: J

Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Attested

[Signature]

Distt: Abbottabad

(ایف-1)

P-16

25314

S-B

IPC

Roll No

1860

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**

**ABBOTTABAD**  
N.W.F.P. PAKISTAN

**PROVISIONAL CERTIFICATE**

INTERMEDIATE EXAMINATION

Session 2000 Annual/Supplementary

Humanities Group

THIS IS TO CERTIFY THAT Azmat Rabbani  
 Son/daughter of Sahib zada Ghulam Rabbani  
 and a candidate of Dist: Manshera  
 Registered No 2292-NS-P-99 has passed the INTERMEDIATE EXAMINATION of the  
 Board of Intermediate & Secondary Education Abbottabad held in Nov. 19, 2000  
 as a Regular/Private candidate. He/She obtained 565 Marks out of 1100 and  
 has been placed in Grade (C) Representing Good

The Examination was taken as a whole/in parts

Prepared by

Checked by

Date of Preparation

*[Handwritten signatures and date 19/05/02]*

*[Handwritten signature]*

Asstt. Secretary (certificates)

A tested

*[Handwritten signature]*  
 Muhtar Khan Tanohi  
 District Secretary Abbottabad

ADS No. 054115

Roll No. 1860

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**

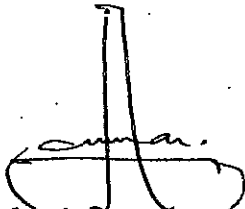


Abbottabad N.W.F.P. - Pakistan  
**INTERMEDIATE EXAMINATION CERTIFICATE**  
HUMANITIES Group  
SESSION SUPPLEMENTARY 2000

This is to certify that AZMAT RABBANI  
Son/Daughter of SAHIBZADA GHULAM RABBANI  
A candidate from MANSEHRA  
Registered No. 2292-AB/P-99 has passed the Intermediate Examination of the  
Board of Intermediate and Secondary Education, Abbottabad held in November 2000 as a  
Private Candidate. He/She obtained 565 marks out of 1100  
and has been placed in Grade C Representing GOOD

The Examination was taken as a whole/in parts and the candidate passed in the following subjects.

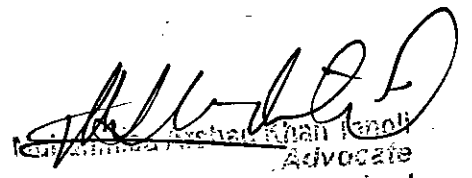
- |            |   |                    |
|------------|---|--------------------|
| 1. English | 3. Islamic Education - Pakistan Studies | 5. ISLAMIC STUDIES |
| 2. Urdu    | 4. ISLAMIC HISTORY                      | 6. URDU ADVANCE    |

  
Asst. Secretary

This certificate is issued without alteration or erasure

  
Secretary

*Attested*

  
Advocate  
Distt: Gouna Abbottabad

**UNIVERSITY OF PESHAWAR**  
(PAKISTAN)

⑥

4-8  
DML

P-18

No 089198



Roll No. 89198

**Detail Marks Certificate**  
B.A. Part-II (Annual) Examination, 2003

Name Sahibzadi Azmat Rabbani

Father's Name Sahibzada Ghulam Rabbani

Certified that the candidate secured the following marks and placed in II Division

S U B J E C T S	MAXIMUM MARKS	M A R K S O B T A I N E D	
		IN FIGURES	IN WORDS
1. English (Compulsory)	75	26	Two 6 six
2. Urdu	75	44	Four four
3. Isl Studies	75	45	Forty five
4. Pakistan Studies (Compulsory)	40	20	Twenty only
Part I Marks	285	142	one hundred & forty two
<small>Errors &amp; omission are subject to subsequent rectification.</small> <b>TOTAL</b>	<b>550</b>	<b>277</b>	<b>Two hundred &amp; seventy seven</b>

The Examination was taken as a **WHOLE / IN PARTS.**

Prepared by [Signature]

11 OCT 2003

[Signature]  
**CONTROLLER OF EXAMINATIONS**  
**UNIVERSITY OF PESHAWAR**

Attested

[Signature]  
District Court, Abbottabad

3425

⑦

M.A.

DMC

SNo: 4915

# HAZARA UNIVERSITY, MANSEHRA, NWER, PAKISTAN



## MASTER OF ARTS (FINAL) ANNUAL 2007 DETAILED MARKS CERTIFICATE

P-20

Roll No: 69257 Registration No: 06-P-5109  
 Student's Name: Sahibzadi Azmat Rabbani Father's Name: Sahibzada Ghulam Rabbani  
 Institution/District: Mansehra Subject: Islamiyat

Course Title	Total Marks	Marks Obtained	Marks In Words	Remarks
MA Previous Marks	500	280	Two Hundred & Eighty	Pass
(VI) (Al-Qura'an) Translation 2nd Half & Commentary alongwith Grammar	100	84	Eighty-Four	Pass
(VII) Principles of Islamic Jurisprudence	100	56	Fifty-Six	Pass
(VIII) Islam & other World Religions	100	70	Seventy	Pass
(IX) Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100	60	Sixty	Pass
(X) Islamic Economics / Islamic Politics / Islam & Science	100	74	Seventy-Four	Pass
General Viva Voce	100	65	Sixty-Five	Pass

Errors and omissions are subject to subsequent rectification.

Total 1100 689  
 Percentage 62.64 %  
 Division First


Controller Examinations  
 Hazara University, Mansehra  
 February 12, 2008

Checked by:

Attested

Controller Examinations  
 District Councils Abbottabad

Serial No. 001688

*P-21* 

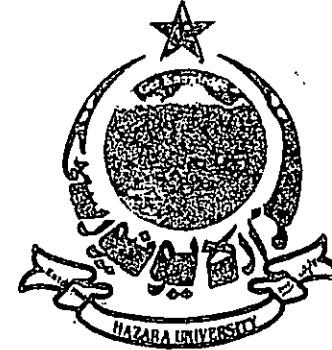
Registration No. 06-P-5109

Roll No. 69257

# HAZARA UNIVERSITY

Mansehra, Pakistan

*M.A*

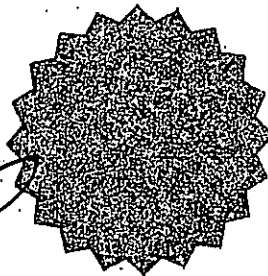


The University in recognition of the fulfilment of prescribed requirements has conferred upon  
Mr / Ms Sahibzadi Azmat Rabbani Son / Daughter of Sahibzada Ghulam Rabbani

The Degree of **MASTER OF ARTS** in Islamiyat  
in the examination held in August, 2007 session Annual 2007 (Private)

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

The examination was taken as a Whole.

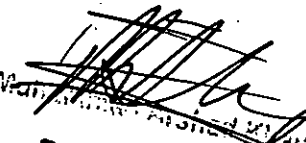


  
Controller of Examinations

Date 12-02-2008

  
Vice Chancellor

  
Registrar

*Alert*  
  
District Courts Abbott  
18/02/08

*M.A*

X (BR)

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

P-19

# University of Peshawar (Pakistan)

Session ANNUAL 2003

SAHIBZADI AZMAT RABBANI DAUGHTER of SAHIBZADA GHULAM RABBANI

and a student of DISTRICT MANSEHRA

having passed the prescribed examination held in JUNE 2003

is this day admitted by the University of Peshawar to the Degree of  
**Bachelor of Arts**

in SECOND Division

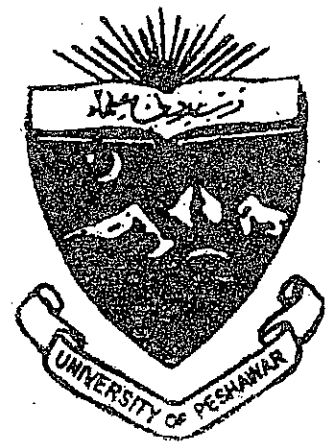
The Examination was taken as a whole ~~in parts~~

Serial No. 080276

Registration No. 2002-PC-4429

Roll No. 89198

Result Declared on 11TH OCTOBER, 2003



*M. Iqbal Khan*  
Registrar

Countersigned  
*[Signature]*  
Vice-Chancellor

*A. A. A. A.*

*[Signature]*  
District Courts, Abbottabad



8 (D.M.C.) C.T.

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
631	Dimension in Education	67
632	Educational Psychology	72
633	School Organization and Management	64
634	English and Its Teaching	52
638	Teaching Strategies and Evaluation	58
612	Practical Workshop and Teaching Practice	75
604	Urdu and Its Teaching	60
605	Social Studies and Its Teaching	63
635	Islamiat and Its Teaching	65

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Total credit hours **XXX** Obtained / Total marks **576 / 900**  
 Total credits AIOU **5 Full Credits** Cumulative grade point average **XXX**  
 First semester: **Autumn 2005** Final semester **Spring 2006**

Grading Scheme	
80% and above:	A+ grade
70% to 79%	A grade
60% to 69%	B grade
50% to 59%	C grade
40% to 49%	D grade
Below 40%	Fail

*[Signature]*  
 Controller of Examinations  
*[Signature]*

*[Signature]*  
 Controller of Examinations  
 Date: \_\_\_\_\_

(C.T.)  
in



P-23

Certified that *Mr/Ms* AZMAT RABBANI  
Son/Daughter of GHULAM RABBANI  
Registration No 01 NMA 0808 Roll No S 633292  
Semester Spring 2006 having met all the requirements  
under the semester system is this day awarded the

### Certificate of Teaching

*He/She* has secured 64 % marks  
and has been placed in B grade



Result declared on: March 20, 2007

*[Signature]*

*[Signature]*  
Controller of Examinations

Date of issue: May 07, 2008

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

*A. Ustaid*  
*[Signature]*  
Muz...  
District Courts Abbottabad

(9)

151989

Serial No. \_\_\_\_\_

# Allama Iqbal Open University Islamabad



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P.T.C

Certified that Mr/Ms AZMAT RABBANI

Son/Daughter of GHULAM RABBANI

Registration No. 01-NMA-0808 Roll No. L-6033354

having completed the prescribed requirements in AUTUMN, 2002 Semester, is awarded

## Primary Teaching Certificate

Detail of courses is as under:

Course Code	Title of the Course	% Marks Obtained	Grade
613	Principles of Education	63	B
614	Educational Psychology	55	B
615	School Organization and Management	56	B
616	School Community and Practical Arts	52	C
617	Teaching of Urdu	60	B
618	Teaching of Mathematics	47	C
619	Teaching of Science and Physical Education	56	B
620	Teaching of Islamiat and Social Studies	54	C
611	Workshop and Teaching Practice	81	At

Obtained/Total Marks: 524/900

He/she has secured 58 % marks and has been placed in grade B.

Result Declared On, JUN 06TH, 2003

Islamabad, dated: SEPTEMBER 25TH, 2003

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

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

*Fajr*  
Controller of Examinations

Note: This certificate is issued without alterations/erasure.

*Attested*  
*Muhammad Aslam Khan Tanoli*  
Advocate  
Islamabad

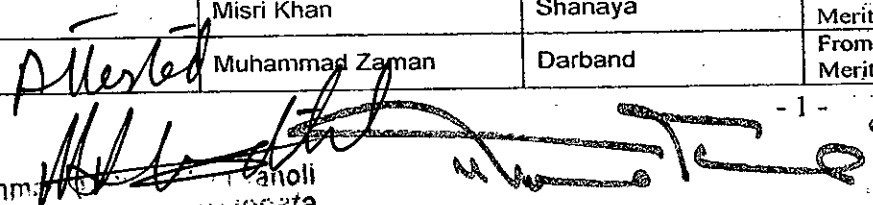
P-25  
Annex C (appointment order)  
③  
ANNEX "D"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

**ORDER**

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	Shagufta Bibi	Muhammad Shafi Khan	Battal	Own UC M/List From Adjacent UCs Merit list
6	Shaista Jabeen	Muhammad Akbar	Kathai	
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 Asia	Abdul Ghafoor	Hilkot	Own UC M/List
U/C Hangrai				
11	Irum Saeed	Saeed Akhtar	Hangrai	Own UC M/List
12	Marium Bibi	Muhammad Younis	Hangrai	Own UC M/List
U/C Ichrian				
13	Bibi 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	Saha 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 Karnoi				
19	Fara Naz	Muhammad Khurshid	Karnoi	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

Attested  
  
 Muhammad Hanoli  
 Associate  
 District Council Abbottabad

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U/C Lissan Nawab

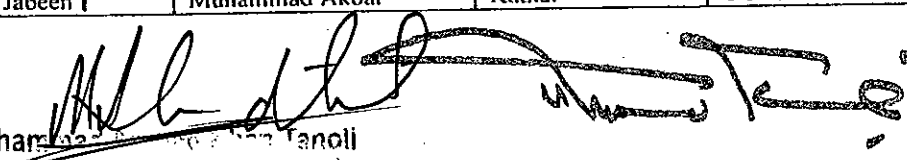
29	Sobia Arshad	Muhammad Arshad	Lissan Nawab	Own UC M/List
30	Rashida Bibi	M.Zahoor	Lissan Nawab	Own UC M/List
<b>U/C Mohandari</b>				
31	Bibi Naseema	Ghulam Nabi	Mohandari	Own UC M/List
<b>U/C Nika Pani</b>				
32	Yasmeen Wahab	Abdul Wahab	Nika Pani	Own UC M/List
33	Neelam	Abdul Latif	Darband	From Adjacent UCs Merit list
<b>U/C Perhinna</b>				
34	Lubna Younis	M.Younis	Perhinna	Own UC M/List
35	Zahida Bano	Ali Zaman	Perhinna	Own UC M/List
<b>U/C Phulra</b>				
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
<b>U/C Sachan Kalan</b>				
41	Bibi Salama	Shezada Khesro Faredon	Sachan Kalan	Own UC M/List
42	Bibi Norin	Rehmat Ullah	Sachan Kalan	Own UC M/List
<b>U/C Sawan Maira</b>				
43	Tahira Jabeen	Muhammad Ayub	Sawan Maira	Own UC M/List
<b>U/C Shanaya</b>				
44	Safoora Farat	Abadul Razaq	Shanaya	Own UC M/List
45	Irum Shaheen	Anwar Khan	Shanaya	Own UC M/List
<b>U/C Shergarh</b>				
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
<b>U/C Shuakat Abad</b>				
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
<b>U/C Trangri Sabir Shah</b>				
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	Own UC M/List
54	Khalida Bibi	M.Yousaf Khan	Trangri Sabir Shah	Own UC M/List
55	Sidra Hamayun	M.Hamayun	Trangri Sabir Shah	Own UC M/List
<b>U/C Bandi Shungli</b>				
56	Salma Javed	Muhammad Javed	Darband	From Adjacent UCs Merit list
57	Nosheen Bibi	Fazal ur Rehman	Darband	From Adjacent UCs Merit list
<b>U/C Tanda</b>				
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	Nazina 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	Kathai	GGPS Chandni	A/V/Post

- 2 -

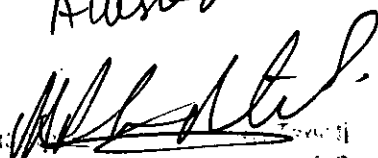
  
 Muhammad Noreen  
 District Council, Abbottabad

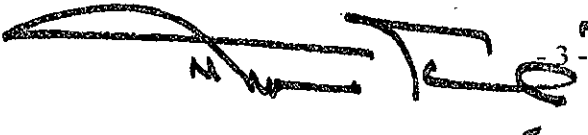
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7	Bushra	Ghulam Mustafa	Bhekund	GGPS Rehman Mian	A/V/Post
8	Naida Ashraf	Muhammiad Ashrif Bag	Gari Habib Ullah	GGPS Danna Ganaila	A/V/Post
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	GGPS Chuntri	A/V/Post
10	Bibi Asia	Abdul Ghafoor	Hilkot	GGPS Khan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



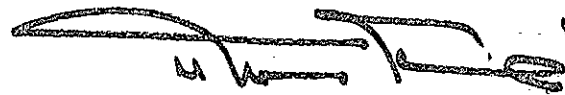
P-28

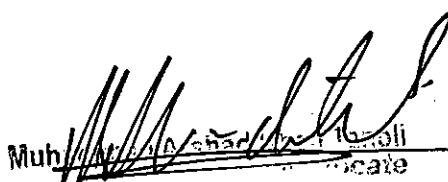
2. They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature will 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 1<sup>st</sup> July 2001 in pervious post, their entitled for pension / gratuity etc.
13. No. TA/DA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

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

Endst: No. 5360-5384 /Estt: (F)Apptt:PET(FY/2011-12 Dated Mansehra the 18<sup>th</sup> May, 2012  
 Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, 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.

  
 EXECUTIVE DISTRICT OFFICER,  
 E&S EDU: MANSEHRA

  
 Muh. Aslam  
 Distt: Courts Abbottabad



ANNEX

E

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA**No. -7780- / S. Cause  
Dated the 28/9/ /2014Email: deofmansehra@yahoo.com  
Phone & Fax: 0997-302518

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**SHOW CAUSE NOTICE**

I, Nagamana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Saibzadi Azmut Rabbani, PST GGPS Talian Manda Gucha Mansehra Show cause Notice as follows:

1) You were illegally appointed as PST at GGPS Talian Manda Gucha; 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.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
  - b) Inflected huge financial losses to the Govt: Treasury receiving pay as result of bogus appointment.
  - c) 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.
- 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 hereby, required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.
- 5) If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-party action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

COMPETENT AUTHORITY

Mst. Saibzadi Azmut RabbaniGGPS Talian Manda Gucha.  
Muh. Saibzadi Azmut Rabbani  
Advocate

Distt: Courts Abbottabad



فرمانہ نمبر ڈی-ای-11-10-13 کو ایگزیکٹو میں سے ایک دفعہ سے لیا گیا ہے

جذبہ نمبر ! P-36

Show Cause Notice

Dated 24-9-2014

No. 7780 / S. Cause

کے جو اب تک مندرجہ ذیل میں - جبکہ ایگزیکٹو 13 کو ایگزیکٹو میں سے ایک دفعہ سے لیا گیا ہے

- (a) معنے اپنے تمام تعلیمی اسناد، قانونی تحریر (Documents) متعلقہ تعلیمی اداروں سے اچھے بڑے حکام حاصل کیے ہیں۔ اور میرا انہیں تعلیمی کوائف (Documents) کو اس وقت کے Competent Authority (EDO) نے check کرنے اور میری بنا پر 1971 اور 72 کی بنا پر اس سے میری appointment ڈونٹ گورنرز پرائمری سکول تالپان مندرجہ ذیل کی ہے۔ میں نے اپنی اپوزیشن میں کسی قسم کا غلط درجہ اور بددیانتی کو درج نہیں کیا۔
- (b) جب سے میری اپوزیشن ہوئی ہے تو میں اپنا فراڈ اور فریب کاری اپنے تمام اسناد میں اپنے گھر سے غائب ہو کر (PCC) حکومت دور درواز پرائمری سکول تالپان مندرجہ ذیل میں مقیم رہا۔ اور حکومت سے اپنی اس مشقت اور محنت کا باقی حصہ ضروری (متمنخواہ) لیتی رہی۔ جو کہ اللہ کے نزدیک میرا حق تھا تھا۔ پینشن لینے سے حکومت کو حالی نقصان نہیں پہنچ سکتا۔
- (c) اپنے اپنے بھائیوں کو اس وقت کے (EDO) نے سازش یا فراڈ سے فریب کاری اپوزیشن کے حقوق اسی وقت کے حقوق کو چھینا ہے۔ پھر آپ کو چاہیے کہ کہ جس اپوزیشن کرنے والے سے بلز میں کیا ہے نہ کہ بیگناہیوں کو اور اپنے محتوی کو آگیا دیا جائے۔ وہ چور دروازے سے داخل ہونے والوں کو برطرف کرنے کے سزا دی جائے۔

تقریب 14-10-2014

انصاف  
 صاحبزادوں عذرت ربانی ڈونٹ گورنرز پرائمری سکول تالپان مندرجہ ذیل مانسہرہ  
 خیال ہے کہ ڈونٹ گورنرز پرائمری سکول مانسہرہ  
 گھد کا پتہ - گاؤں، ڈاکخانہ بجنہ تحصیل ضلع مانسہرہ  
 Attested

Muhammad Tanoli  
 Dist: Gujrat, Abbottabad

The Director,  
Elementary & Secondary Education,  
KPK Peshawar.

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Annex

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDST NO2106-15/AE-I/Estab: DATED 03-03-2015 WHEREBY MAJOR PANALTY OF DISMISSAL FROM GOVT SERVICE WAS IMPOSED UPON THE APPELLANT WITHOUT LAWFUL AUTHORITY (COPY OF IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS ANNEX "A")

PRAYER:

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

Respected sir,

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

- (I) That the then EDO (E&SE) Mansehra invited application for recruitment of teachers of various cadres in Distt : Mansehra through advertisement published in daily Shamal (copy attached and marked as Annex "B")
- (II) That as per procedure appellant applied for the post of PST .ETA test was conducted on 26-2-2011 and appellant appeared as a candidate under Roll No 1703132 and obtained 128 marks out of 300. (copy attached and marked as Annex "C")
- (III) That the then EDO conducted interview and scrutinized the documents of the candidates and merit list of the candidate was displayed for receiving objections. After due process the meeting of DSC was held and approved the cases of 59 candidates for appointment against the post of PST whereas the name of appellant falls at S.No 58.
- (IV) That appointment order of the appellant was issued under Edstt No 5360-5384/Estt: (F) Apptt: PST (F)/2011-2012 dated 18-05-2012 and Appellant was posted against the post of PST at GGPS Talian Manda Gucha Mansehra. (copy attached and marked as Annex "D")
- (V) That appellant continuously performing her duty without any break for the last 02 Years & 09 Months while she received a show cause notice whereby allegations were leveled against the appellant based on concealment and concealment of facts. The same are reproduced as below.

Attested

*[Signature]*  
Muhamm

"YOU WERE ILLEGALLY APPOINTED AS "PST" AT GGPS TALIAN MANDA GUCHA MANSEHRA VIDE DEFUNCT EXECUTIVE DISTRICT OFFICER (E & SE) MANSEHRA ENDSTT NO 5360-5384/ESTT: (F) APPTI: PST (F) 2011-2012 DATED 18-05-2012 WHERE YOU WERE STRANGER FOR RECRUITMENT PROCESS INITIATED THROUGH ETA ACCEPTANCE OF YOUR APPEAL AND SUBSEQUENTLY YOUR APPOINTMENT ORDER WAS THE RESULT OF MISUSE OF AUTHORITY BY THE THEN EDO ACCORDING TO HIS SWEET WILL AND WISHES AGAINST THE RECRUITMENT RULES"  
( Copy attached and marked as Annex "E")

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- (VI) That a reply was submitted in response to show cause notice whereas appellant adopted continuation that she was appointed after due recruitment process and her appointment order along with 58 other candidates was issued in a lot after the approval of DSC (copy attached and marked as Annex "F")
- (VII) That appellant received impugned order dated 03/13-2015 whereas the major penalty of dismissal from service has been imposed upon the appellant.
- (VIII) That appellant passed her professional qualification (PST) from AIOU (Islamabad). (copy attached and marked as Annex "G")

Sir,

(a) Appellant was appointed after due process of recruitment through ETA test and appointment order of 59 candidates was issued after the approval of DSC. The appellant served for a period of 02 Years and 09 Months without any break to the entire satisfaction of department.

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

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

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

Dated: 11/03/2015

Attested

Yours Faithfully

(Appellant)

SAHIBZADI AZMAT RABBANI

GGPS Tanca Mansehra

Rabbani  
12/13/15

Muhamm

Distt: Islamabad

کورٹ فیس قیمت

# وکالت نامہ

بعدالت KPK سرویس سہیل لہ اور  
عنوان: صاحبزادی عظمت ریحی کڈی نام گورنمنٹ ایچ ایچ ایچ اسکول  
منجانب: ایڈووکیٹ  
نوعیت مقدمہ: سہیل

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام  
محترمہ صاحبزادی عظمت ریحی کڈی کے لئے 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 دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء  
وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور  
کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار  
بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول  
ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔  
نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف  
پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف  
مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائرہ کرنے اور اس کی  
پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔  
لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم:

بمقام:

Attest  
M. Shehla Khan Tanoli  
Adv High Court And

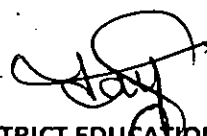
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 787/2015

Respectfully Shewth

1. That the services appeal No: 787/2015 in respect of MST: Sahidzadi azmat Rabani is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4088-93/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

د حیدر

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

**NOTIFICATION.**

WHEREAS, ~~Mst. Sahibzadi Azmat Rabanni PST~~ at Government Girls Primary School Tallian Manda Gucha District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 2106-15 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. She belongs to U/C Tanda, where two posts of PST were lying vacant. Her name was at S. No. 01 of the merit list of her U/C. She was appointed in her own U/C Tanda but was wrongly adjusted in GGPS Tallian Manda Gucha U/C Jabba Develi vide Endst.No.5360-84 dated 18/5/2012 at S.No.18.

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. 2106-15 dated 03/03/2015 and reinstate Ms. Sahibzadi Azmat Rabanni PST at Government Girls Primary School Tallian Manda Gucha District Mansehra with effect from the date of her dismissal with all back benefits.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4088-93 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

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

1. District Education Officer (Female) Mansehra
2. 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