


18.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that identical service appeals No.758 to 789/2015 have already been admitted to regular hearing and fixed for further proceeding on 20.10.2015.

In view of the above, this appeal is also admitted to regular hearing. 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.

Appellant Deposited
Security & Process Fee



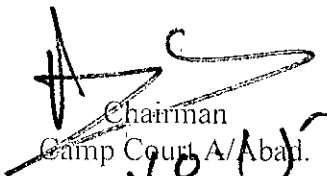

Chairman
Camp Court Abbottabad

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Dismissed as withdrawn.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. 853/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.07.2015	<p>The appeal of Mst. Ayisha resubmitted 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	30-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>18-8-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Aisha D/O Misri Khan GGPS Thakra Distt. Mansehra Mansehra received to-day i.e. on 10.07.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Copy of enquiry report shown in the index of the appeal at serial No.5 is not attached with the appeal which may be placed on it.
- 4- Copy of corrigendum letter shown in the index of the appeal at serial no.4 is not attached with the appeal which may be placed on it.
- 5- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1064 /S.T,

Dt. 10/7 /2015

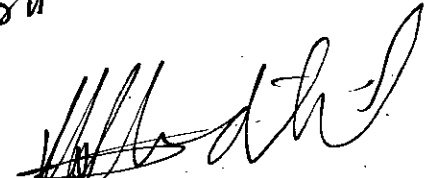

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M.Arshad Khan Tanoli Adv. Mansehra ^{A. Arshad}

Re-submission of appeal.

Sir,

Memo of appeal has been got signed from the appellant & the * captioned appeal is re-submitted duly rectified as per objection of the Honourable Tribunal. Copy of corrigendum mentioned in para 4 of the objection may please be treated as not attached. However, the same shall be submitted as and when received from the Deptt.


dt 16/7/2015

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 853/2015

Aisha D/O Misri Khan GGPS Thakra (PST) R/O Village Rarhan UC
Dara Shanaya P.O Darband Tehsil Oghi & 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
6	Copy of impugned dismissal order of appellant	"E"	27
7	Copy of departmental appeal /representation	"F"	28-30
8	Wakalatnama		31

Dated: 8/7/2015

Appellant

Through

Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

(11)

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 853/2015

A.W.F. PROVINCE
Service Tribunal
Diary No. 822
dated 10-7-2015

Aisha D/O Misri Khan GGPS Thakra (PST) R/O Village Rarhan UC
Dara Shanaya P.O Darband Tehsil Oghi & 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"

Filed to-day
Registrar
10/7/15

re-submitted to-day
and filed.

Registrar
28/7/15

(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 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 2006-15/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

(3)

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

(4)

endst. No 2006-15/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 10.3.2015. **Copy of departmental appeal /representation is attached as annexure "F"** but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

GROUND

- a. That, the appellant fulfilled the criteria of appointment as 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.

(5)

- 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,

(6)

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

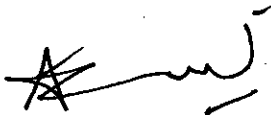
(7)

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

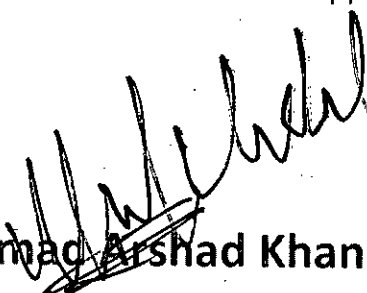
- j. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 2006-15/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: 8/7/2015


Appellant

Through


Muhammad Arshad Khan Tanoli.
Advocate, High Court
Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Aisha D/O Misri Khan GGPS Thakra (PST) R/O Village Rarhan UC
Dara Shanaya P.O Darband Tehsil Oghi & 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 2006-
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

(19)

required qualification/criteria for the said post and the applicant has not been contested by any one as there was no contesting rival candidate.

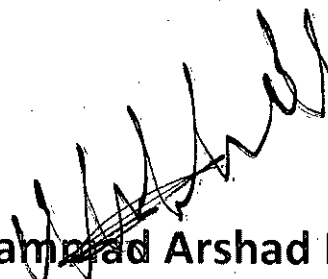
5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

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

Dated: 8/7/2015

Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

16

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Aisha D/O Misri Khan GGPS Thakra (PST) R/O Village Rarhan UC
Dara Shanaya P.O Darband Tehsil Oghi & District Mansehra

.....Appellant

VERSUS

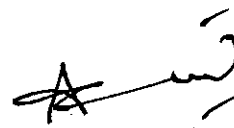
1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

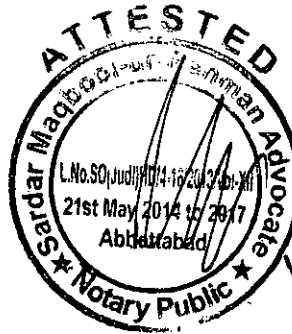
AFFIDAVIT

I, Aisha D/O Misri Khan GGPS Thakra (PST) R/O Village Rarhan UC Dara Shanaya P.O Darband Tehsil Oghi & 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: 8/7 /2015



Deponent



حکومت سندھ کے زیر اہتمام تعمیرات حکومت سندھ کے زیر اہتمام

Sl. No.	Particulars	Estimate No.	Estimate Year	Value (Rs. Lakhs)
1	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
2	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
3	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
4	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
5	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
6	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
7	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
8	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
9	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
10	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000

Pre Bid Meeting
 Date: 31-05-2011 at 11:00 AM
 Venue: Government General Hospital, Sukkur
 For: Construction of 1000 beds in Government General Hospital, Sukkur

1. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
2. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
3. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
4. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
5. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
6. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
7. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
8. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
9. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.
10. The tender documents are available for sale from 01.05.2011 to 31.05.2011 at 11:00 AM.

0937-870861 فون

Sl. No.	Particulars	Estimate No.	Estimate Year	Value (Rs. Lakhs)
1	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
2	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
3	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
4	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
5	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
6	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
7	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
8	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
9	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000
10	Construction of 1000 beds in Government General Hospital, Sukkur	1000	2011-12	1000

0937-870861 فون

Attested
 Signature
 Name: [Signature]
 Design: [Signature]

Annex "B"

141237

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD

Name AISHA
Father's Name MESRY KHAN
Address VILL AND P/O DARBAND OGHI
Tehsil D/O MESRY KHAN
OGHI
District MANSEHRA

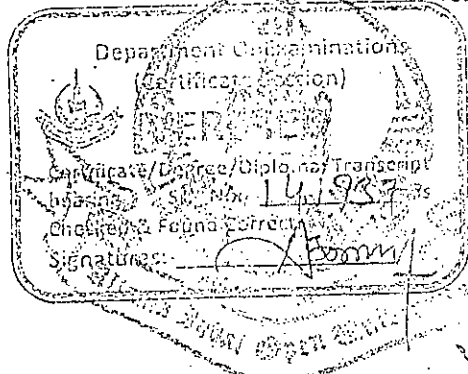
Roll No. TG37737
Registration No. 06NNA00234
Final Semester AUT- 2006

has successfully completed PRIMARY TEACHING CERTIFICATE

P-12

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Attained	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	55
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	54
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	58
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	54
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	76
AUT- 06	0617	TEACHING OF URDU	100	54
AUT- 06	0618	TEACHING OF MATHEMATICS	100	64
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	58
AUT- 06	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	58



Head Mistress
GCHS, Darband
Mansehra

Handwritten signature and notes in Urdu.

CREDITS: 5
Result Declared on SEPTEMBER 20, 2007
Date of issue SEPTEMBER 25, 2007

Total Marks / Obtained 900 / 531
Percentage / Grade 59 C

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.

Attested
Muhammad Asad Khan Tanoli
Advocate
Distt: Courts Abbottabad

ADS No. 043245

Roll No. 2308

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Muhammad Arshad Khan Tanoli
Advocate
Distt. Courts Abbottabad

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

This is to certify that AISHA
Son/Daughter of MISRY KHAN

A candidate from MANSEHRA DISTRICT

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in September 2004 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 | 2. URDU | 3. ISLAMİYAT | 4. PAK STUDIES |
| 5. MATHS | 6. G. SCIENCE | 7. ISL: STUDIES | 8. A.M. DRAWING |

Date of Birth according to admission form is TENTH AUGUST

One Thousand Nine Hundred and THIRTY-FIVE (10-08-1985)

Asstt. Secretary

Head Mistress
G.C.H.S New Darband
Mansehra

This certificate is issued without alteration or erasure.

Secretary

339050

Sr. No. AD _____

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD
DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(Class X)



Session 2004 (Supplementary)
 Group (HUMANITIES GROUP)

P-14

Name: AishaFather's Name: Misry KhanRoll No 2308

Subjects	Marks	MARKS OBTAINED			
		Theory/A	Pract/ B	Total	In Words
1. English	150	41	32	73	Seventy-Three
2. Urdu	150	53	39	92	Ninety-Two
3. Islamiyat	75	46		46	Forty-Six
4. Pakistan Study	75	41		41	Forty-One
5. Maths	100	33		33	Thirty-Three
6. G. Science	100	54		54	Fifty-Four
7. Isl. Studies	100*	68		68	Sixty-Eight
8. A.M. Drawing	100	47	24	71	Seventy-One

Total 850

478-C Four Hundred Seventy-Eight Only

Remarks

Checked By:

Date: 04-11-2004

Note: Error / Omission are excepted

Computer Section BISE, Abbottabad

Head Mistress
 G.G.H.S. New Garh
 Mianchra
 Controller of Examinations
 BISE Abbottabad

Attested

Muhammad Arshad Khan Tanoli
 Advocate
 Dist. Court, Abbottabad

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

Annex 98



P-15

Certificate No: 206048166

Roll No: 48166

DETAILED MARKS CERTIFICATE Group: HUMANITIES

HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

Dup

Part - II
Session: 2006 (Annual)

Handwritten notes and signatures

Name: AISHA
Father Name: MISRY KHAN
Institution: MANSEHRA
District: _____

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

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	44	--	52	--	96	Ninety-Six
Urdu (Comp)	200	54	--	51	--	105	One Hundred and Five
Islamic Education	50	28	--	--	--	28	Twenty Eight
Pakistan Studies	50	--	--	21	--	21	Twenty One
Islamic History	200	45	--	33	--	78	Seventy Eight
Arabic	200	42	--	42	--	84	Eighty-Four
Islamic Studies	200	69	--	35	--	104	One Hundred Four
Total: 1100						516	Five Hundred Sixteen Only

Handwritten signatures and stamps
RESULT VERIFIED
F.S.C.S.E. 2006

SECRECY OFFICER
Board of Intermediate & Secondary Education
Abbottabad

Date: 18-January, 2007

Checked By: _____

Handwritten signature
Head Mistress
G.O.H.S. New Bahad
Mansehra

Controller of Examinations

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

Handwritten signature
Verified

Handwritten signature
Muhammad Arshad Khan Tandon
Distt: Courts Abbottabad

Serial No.
141937

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Name AISHA
Father's Name MESRY KHAN
Address VILL AND P/O DARBAND OGHI
D/O MESRY KHAN
Tehsil OGHI
District MANSEHRA
has successfully completed

Roll No. TG37737
Registration No. 06NMA0232
Final Semester AUT- 2006

P-16

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	55
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	54
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	58
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	54
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	76
AUT- 06	0617	TEACHING OF URDU	100	54
AUT- 06	0618	TEACHING OF MATHEMATICS	100	64
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	58
AUT- 06	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	58

Head Mistress
G/O DARBAND OGHI
MANSEHRA

Attested
Head Mistress
District Council Abbottabad

قاریہ ایشہ

CREDITS: 5

Total Marks / Obtained 900 / 531

Result Declared on SEPTEMBER 20, 2007

Percentage / Grade 59 C

Date of issue SEPTEMBER 25, 2007

Head Mistress
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.

DOMICILE CERTIFICATE

~~(NORTH WEST FRONTIER PROVINCE)~~

KHAYBER PAKHTOON KHAWA

I declare that was born of parents are permanently
Domiciled N.W.F.P Having belonged to it by birth/ settled

8-18

I belong by birth to village / Mohall a. ARRAN

Tehsil OGHI District MANSEHRA

Signature of the applicant

Dated 13/05/2010

Pursuance to the declaration dated 13/05/2010 Filed by Aisha

Son/ Daughter Misri Khan

Hereby certificate that the said K.P.K Aisha is born of parent who
Are permanent residents of the N.W.F.P having belonged to it by birth / settled in it
I have satisfied my self from personal / my knowledge verification that

The above declaration is true and certify.

This 23 rd day of June 2010

No 6292 Dated 30-6-10
Countersigned

DEPUTY DISTRICT REVENUE OFFICER

Deputy District Officer
Revenue & Estate Oghi.

DISTRICT OFFICER
REVENUE OFFICER

MANSEHRA

Head Mistress
G.O.H.C. Near Darband
Mansehra

Attested
[Signature]

Distt: Courts Abbotta

was the regular student of Islamia Public School
New Dabband.

۲۰۱۹

Principal
Islamia Public School
New Dabband District

ضمانت نامہ :-

میں نے اپنے والدین کی طرف سے ضمانت نامہ دیا ہے کہ وہ میری تمام تعلیمی اخراجات ادا کریں گے۔
میرا نام محمد علی ہے۔ میرا پتہ اسلام آباد اور میں نے اسلام آباد پبلک اسکول میں تعلیم حاصل کی ہے۔
میرا پتہ اسلام آباد ہے۔ میرا پتہ اسلام آباد ہے۔ میرا پتہ اسلام آباد ہے۔

محمد علی احمد
محمد علی احمد
محمد علی احمد

میں نے اپنے والدین کی طرف سے ضمانت نامہ دیا ہے کہ وہ میری تمام تعلیمی اخراجات ادا کریں گے۔
میرا نام محمد علی ہے۔ میرا پتہ اسلام آباد اور میں نے اسلام آباد پبلک اسکول میں تعلیم حاصل کی ہے۔
میرا پتہ اسلام آباد ہے۔ میرا پتہ اسلام آباد ہے۔ میرا پتہ اسلام آباد ہے۔

ضمانت نامہ :-

میں نے اپنے والدین کی طرف سے ضمانت نامہ دیا ہے کہ وہ میری تمام تعلیمی اخراجات ادا کریں گے۔
میرا نام محمد علی ہے۔ میرا پتہ اسلام آباد اور میں نے اسلام آباد پبلک اسکول میں تعلیم حاصل کی ہے۔
میرا پتہ اسلام آباد ہے۔ میرا پتہ اسلام آباد ہے۔ میرا پتہ اسلام آباد ہے۔

23/11/2010
17/11/2010
2010

ADS No. 943245

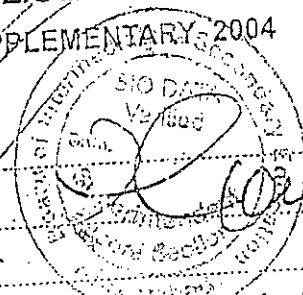
Roll No. 2308

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



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

This is to certify that AISHA
Son/Daughter of MISRY KHAN
A candidate from MANSEHRA DISTRICT



انستہ پست
ب 99/9

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in September 2004 as a Regular/Private Candidate. He/she obtained 170 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. A.M. DRAWING

Date of Birth according to admission form is FIFTH AUGUST
One Thousand Nine Hundred and EIGHTY-FIVE (10-08-1985)

Head Mistress
G.G.H.S New Garband
Mansehra

Assst. Secretary

Secretary

This certificate is issued without alteration or erasure.

Attested
Muhammad Ali
Distt. Courts
Advocate

ORDER

ANNEX 1
C

Consequent upon the recommendation of the Departmental Selection Committee, District Manshehra, 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/ Domicile 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 Bahadar	Behali	Own UC M/List
U/C Battal				
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	Own UC M/List
6	Shaista Jabeen	Muhammad Akbar	Kathai	From Adjacent UCs Merit list
U/C Bhekund				
7	Bushra	Ghulam Mustafa	Bhekund	Own UC M/List
U/C Gari Habib Ullah				
8	Naida Ashraf	Muhammad Ashraf Bag	Gari Habib Ullah	Own UC M/List
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	Own UC M/List
U/C Hilko				
10	Bibi Asia	Abdul Ghafoor	Hilko	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. Farooq Khan	Ichrian	Own UC M/List
U/C Jabar Daveii				
15	Mah Jabeen	Muhammad Farooq	Jabar Daveii	Own UC M/List
16	Saba Tariq	Muhammad Tariq	Sachan	From Adjacent UCs Merit list
U/C Jaloo				
17	Sobia Bibi	Abdul Ghaffoor	Jaloo	Own UC M/List
18	Saima Naz	Mir Afzal	Jaloo	Own UC M/List
U/C Karnoi				
19	Fara Naz	Muhammad Khursid	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	Khalid 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

P-21

PRINCIPAL
GOVT HIGH SCHOOL
PHULRA (Manshehra)

GOVT HIGH SCHOOL
PHULRA (Manshehra)

Re-attested

Attested
Advocate
District Courts Abbottabad

	Bibi Naseema	Ghulam Nabi		
			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 Perhina	
34	Lubna Younis	M.Younis	Perhina	Own UC M/List
35	Zahida Bano	Ali Zaman	Perhina	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 Malra	From Adjacent UCs Merit list
			U/C Sachan Kalan	
41	Bibi Salama	Sheezada Khesro Faridon	Sachan Kalan	Own UC M/List
42	Bibi Norin	Rehmat Ullah	Sachan Kalan	Own UC M/List
			U/C Sawan Malra	
43	Tahira Jabeen	Muhammad Ayub	Sawan Malra	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 Shukat Abad	
50	Sadia Javed	Javed Khan	Shukat Abad	Own UC M/List
51	Sabeen	M.Haroon	Shukat Abad	Own UC M/List
52	Tabasum Rashid	Abdul Rashid	Shukat Abad	Own UC M/List
			U/C Trangri Sabir Shah	
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	Own UC M/List
54	Khalida Bibi	M.Yousaf Khan	Trangri Sabir Shah	Own UC M/List
55	Sidra Hamayun	M.Hamayun	Trangri Sabir Shah	Own UC M/List
			U/C Bandi Shungli	
56	Salma Javed	Muhammad Javed	Darband	From Adjacent UCs Merit list
57	Nosheen Bibi	Fazal ur Rehman	Darband	From Adjacent UCs Merit list
			U/C Tanda	
58	Sahibzada Hazmat Rabani	Ghulam Rabani	Tanda	From Adjacent UCs Merit list
59	Asma Noreen	Nawab Khan	Dhodial	From Adjacent UCs Merit list

ADJUSTMENT ORDER

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

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

Handwritten signature
PRINCIPAL
GOVT HIGH SCHOOL
PHULRA Mandstira

Handwritten signature
PRINCIPAL
GOVT HIGH SCHOOL
PHULRA Mandstira

Handwritten signature
Attested

13	Saeed	Saeed Akhtar	Hungrai	GGPS Kalus Ghannai	A/V/Post
14	Mahmud Bibi	Muhammad Younsi	Hungrai	GGPS Kalus Ghannai	A/V/Post
15	Bibi Sajida	Saeed ur Rehman	Ichrian	GGPS Karmang Nhycon	A/V/Post
16	Saima Ara	M. Farced Khan	Ichrian	GGPS Ramsara	A/V/Post
17	Mah Jabeen	Muhammad Farooq	Jabar Daveli	GGPS Baso Manda Gucha	A/V/Post
18	Saba Tariq	Muhammad Tariq	Sachan	GGPS Baso Manda Gucha	A/V/Post
19	Sobia Bibi	Abdul Ghafoor	Jaloo	GGPS Tajiun Di Kasi	A/V/Post
20	Saima Naz	Mir Afzal	Jaloo	GGPS Chor Banda	A/V/Post
21	Fara Naz	Muhammad Khurshid	Kamool	GGPS Bhoraj	A/V/Post
22	Nadia Rehman	Habib ur Rehman	Pairan	GGPS Dheri Sohail	A/V/Post
23	Amrin Younis	Muhammad Younis	Karori	GGPS Seri Mairi	A/V/Post
24	Musrat Bibi	Khalil ur Rehman	Karori	GGPS Malhar	A/V/Post
25	Zenab	Alam Zeb	Karori	GGPS Malhar	A/V/Post
26	Amrin Kusar	Muhammad Miskeen	Karori	GGPS Malhar	A/V/Post
27	Rukhsana Taj	Taj Muhammad	Karori	GGPS Fata Bandi	A/V/Post
28	Bifat Bibi	Faqeer Muhammad	Shanaya	GGPS Fata Bandi	A/V/Post
29	Ashla	Misri Khan	Shanaya	GGPS Naryala	A/V/Post
30	Razla Bibi	Muhammad Zaman	Darband	GGPS Thakra	A/V/Post
31	Sobia Arshad	Muhammad Arshad	Lassan Nawab	GGPS Dhok	A/V/Post
32	Rashid Bibi	M. Zahoor	Lassan Nawab	GGPS Sharota	A/V/Post
33	Bibi Naseema	Ghulam Nabi	Mohandari	GGPS C. Bala	A/V/Post
34	Yasmien Wahab	Abdul Wahab	Nika Pani	GGPS Badal Gran	A/V/Post
35	Neelam	Abdul Latif	Darband	GGPS Cham	A/V/Post
36	Lubna Younis	M. Younis	Perhinna	GGPS Cham	A/V/Post
37	Zahida Bano	Ali Zaman	Perhinna	GGPS Phalkot	A/V/Post
38	Bibi Saleha	Abdula Jan	Phulra	GGPS Phalkot	A/V/Post
39	Mehnaz Bibi	M. Iqbal	Phulra	GGPS Ghazikot	A/V/Post
40	Bibi Mewash	M. Naveed	Phulra	GGPS Dhaman	A/V/Post
41	Farzana Yousaf	M. Yousaf	Phulra	GGPS Ghazikot	A/V/Post
42	Bibi Farah	Khurshid Khan	Phulra	GGPS Barsagi	A/V/Post
43	Bibi Salama	Shezada Khesro Fareedon	Sawan Maira	GGPS Gojar Gali	A/V/Post
44	Bibi Norin	Rehmat Ullah	Sachan Kalan	GGPS Kalus Nawaz Abad	A/V/Post
45	Tahira Jabeen	Muhammad Ayub	Sachan Kalan	GGPS Kalus Nawaz Abad	A/V/Post
46	Safoora Farat	Abdul Razaq	Sawan Maira	GGPS Meher	A/V/Post
47	Irum Shaheen	Anwar Khan	Shanaya	GGPS Numshera Shahkot	A/V/Post
48	Saeeda Haidar	Mir Haidar	Shanaya	GGPS Numshera Shahkot	A/V/Post
49	Fozia Bibi	Sher Bahadar	Shergarh	GGPS Gakhara	A/V/Post
50	Sadia Gul	M. Zaman	Shergarh	GGPS Perchaian	A/V/Post
51	Asma	Abdul Malik	Shergarh	GGPS Perchaian	A/V/Post
52	Sadia Javed	Javed Khan	Darband	GGPS Shorolian	A/V/Post
53	Sabeen	M. Haroon	Shuukat Abad	GGPS Lalan Da Darra	A/V/Post
54	Tabasam Rashid	Abdul Rashid	Shuukat Abad	GGPS Chajr Bala	A/V/Post
55	Nabeela Ghuncha Guf	Bashir Ahmad Khan	Shuukat Abad	GGPS Panjyali	A/V/Post
56	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post
57	Sidra Hamayun	M. Hamayun	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post
58	Saima Javed	Muhammad Javed	Trangri Sabir Shah	GGPS Khafi Paloi	A/V/Post
59	Noshin Bibi	Fazal ur Rehman	Darband	GGPS Pagora	A/V/Post
60	Sahibzadi Azmat Rehani	Ghulam Rabani	Darband	GGPS Beer Bat	A/V/Post
61	Asma Noreen	Nawab Khan	Tanda	GGPS Tajiun Manda Gucha	A/V/Post
62			Dhodial	GGPS Kalus	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.

[Signature]
PRINCIPAL
GOVT HIGH SCHOOL
PHULRA Mansohra

[Signature]
GOVT HIGH SCHOOL
PHULRA Mansohra

[Signature]
Re-attest
GOVT HIGH SCHOOL
PHULRA Mansohra
Advocate
Phulra Mansohra

P-24

- ship will be stand automatically cancelled.
1. 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 Manshira)
 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 Manshira.
 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 Manshira 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, Manshira.
- 4-5. District Officer (M&F) Local Office.
6. Deputy District Officer (Female) E&SE Manshira.
7. PA to District Coordination Officer, Manshira.
8. Budget & Accounts Officer, local office, Manshira.
- 9-67 Candidates concerned.

[Handwritten Signature]
 PRINCIPAL
 GOVT HIGH SCHOOL
 PHULRA, Manshira

[Handwritten Signature]
 EXECUTIVE DISTRICT OFFICER
 E&S EDU: MANSEHRA

[Handwritten Signature]

Attested
[Handwritten Signature]
 Distt. Courts Abbottabad

Attested
[Handwritten Signature]
 DDO (E&S)

P. 25

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

ORDER.

As approved by the competent authority Mst:Aisha PST Govt: Girls Primary School Lass Thakra is hereby adjusted at Govt: Girls Primary School Shanaya against vacant post in the interest of public service with immediate effect.

Notes:-

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

S/-
EXECUTIVE DISTRICT OFFICER
E & S EDUCATION MANSEHRA

Endst: No. 1531-34 Adjustment/GB/DDC(F)

Dated 2/7/12/2012.

Copy to the:-

1. ADO circle Shergarh.
2. Head Teacher concerned.
3. Teacher concerned.

Attested
Muhammad Khan Tanoli
 Distt: Courts Abbottabad

[Signature]
 DY: DISTRICT OFFICER (F)
 E&S EDUCATION MANSEHRA

Attested
[Signature]
 PRINCIPAL
 Govt: Girls Secondary
 Shanaya Mansehra

No. 7768 / S. Cause
Dated the 29/8 / 2014

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

SHOW CAUSE NOTICE

P-26

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. Ayesha D/O Misri Khan, PST GGPS Thakra Mansehra Show cause Notice as follows:

- 1) You were illegally appointed as PST at GGPS Thakra vide defunct Executive District Officer (E&SE) Mansehra at S. No. 27, 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) Inflicted 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 seven days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-parte action shall be taken against you.
 - ✓ 6) A copy of the finding inquiry committee related page is enclosed.

COMPETENT AUTHORITY

Mst. Ayesha D/O Misri Khan

GGPS Thakra

Naghmana
Ayesha
Mst. Ayesha D/O Misri Khan
Distt. Officer



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

P-27

- 1:- Where as Mst: Ayisha D/O Misri Khan working as PST GGHS/GGMS/GGP Thalra, 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: Ayisha D/O Misri Khan CT/PET/TT PST GGHS/GGM GGPS Thalra.

(Signature)
DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 2006-15 /AE-____/Estab: dated 23/03/2015.
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)
DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

(Signature)
Muhammad Asad Khan Tanoli
Advocate
District Courts Abbottabad.

Annex

F

بخدمت جناب ڈائریکٹر صاحب ایجوکیشن ڈیپارٹمنٹ خیبر پختونخواہ پشاور

عنوان: اپیل برخلاف برطرفی

P-28

جناب عالی۔ اپیل ذیل عرض ہے۔

۱۔ یہ کہ سالکہ کی تقرری بحسبیت PST محکمہ تعلیم مانسہرہ میں بحوالہ انڈوسٹریٹ نمبر
GGPS 1531-34-dated 18-05-2012 ٹھاکرہ U/C کروڑی میں
ہوئی تھی۔ (آرڈر کی کاپی لف ہے۔)

Attested
Muhammad Anan Tahir
Advocate
Distt: Courts Abbottabad

۲۔ یہ کہ تقرری سے پہلے سالکہ نے تقرری کے لیے تمام لوازمات پورے کر کے تھے جس
میں EATA ٹیسٹ سے لیکر انٹرویو تک شامل ہے۔

۳۔ یہ کہ سالکہ C اور دورہ شنائیہ کی رہائشی ہے۔ اپنے یونین کونسل میں سالکہ میرٹ
لسٹ پر تیسرے نمبر پر تھی۔

۴۔ یہ کہ اپنے یونین کونسل میں آسانی نہ ہونے کی وجہ سے میری تقرری
GGPS ٹھاکرہ
U/C کروڑی میں کہ دی گئی تھی۔ جو کہ U/C دورہ شنائیہ کا ملحقہ یونین کونسل ہے۔

۵۔ یہ کہ مورخہ 29-9-2014 بحوالہ انڈوسٹریٹ نمبر 7768 مجھے
DEO(F) مانسہرہ کی طرف سے ایک Show-cause نوٹس موصول ہوا۔ جس میں
میری تقرری کے حوالے سے مختلف چارجز لگائے گئے تھے اور میں نے

Show-cause کا جواب DEO(F) نمبرہ کو مورخہ 05-10-2014 کو ارسال کیا تھا۔

(Show Cause نوٹس اور جواب کی کاپیاں لفٹ ہیں) Show cause نوٹس میں لگائے گئے چارجز بالکل بے بنیاد اور بدینتی پر مبنی ہیں۔

Show Cause کے پیرا نمبر 6 میں انکوائری رپورٹ کا ذکر ہے۔

جس میں مجھے اس لیے نکالا گیا ہے۔ کہ میری تقرری اپنی یونین کونسل شناسیہ میں نہیں بلکہ کروڑی یونین کونسل میں ہوئی ہے۔ جو کہ شناسیہ یونین کا ماتحتہ یونین کونسل نہیں ہے۔ (برطانی کارڈ آرڈر لفٹ ہے۔)

Muhammad Aslam Khan Jang
District Courts Abbottabad

انکوائری رپورٹ کی یہ بات سراسر غلط ہے۔

یوٹی شناسیہ یونین کونسل کروڑی کا ماتحتہ یونین کونسل ہے۔ کیونکہ یونین کونسل شناسیہ گاؤں گدولگہ سیری یونین کونسل کروڑی کے گاؤں ڈنہ، کڑم گلی اور چھیال کے ساتھ بالکل جڑے ہوئے ہیں۔

اس سے یہ ثابت ہوتا ہے کہ یونین کونسل درہ شناسیہ اور یونین کونسل کروڑی کا ماتحتہ یونین کونسل ہے۔

9۔ DEO(F) نے قانونی تقاضے پورے نہیں کیے اور نہ ہی مجھے Personal Hearing کے لیے بلایا تھا۔۔ برطرف کیا ہے۔

مندرجہ بالا احکام کو مد نظر رکھتے ہوئے DEO(F) نمبرہ نے میری برطرفی کا جو آرڈر نمبر جاری کیا ہے۔ اس کو منسوخ فرما کر میری اپیل منظور فرماتے ہوئے مجھے ملازمت پر بحال کیا جائے۔

P-30

المرقوم 10-03-2015

ارض

عائشہ PST دختر مصری خان

GGPS PST ٹھاکرہ

حال GGPS

مستقل پیتہ - گاؤں ریزاں یونین کونسل درہ شنائیہ ڈاکٹراندر بند تحصیل اوگی ضلع مانسہرہ

قیمتی

کورٹ فیس

وکالت نامہ

بعدالت ۱۲۲۲ سرویس کنٹرول کتا اور
 عنوان: عالیہ بنام گورنمنٹ آف پاکستان ایجوکیشن
 منجانب: ایڈووکیٹ
 نوعیت مقدمہ: اس کے باعث تحریر آنکہ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام
 حیدرآباد میں منجانب سے
 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 بر حلف 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 پر داختم 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 جز و بقایا ہو تو وکیل صاحب موصوف
 مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمواد 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۔

بمقام: ایڈووکیٹ

المرقوم: ایڈووکیٹ

Attest

(Handwritten signature)

M. Asghad Khan Tanali -
Adv High Court Ad

(Handwritten signature)

عالمگیر دھرم سنگھ


BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 853/2015

Respectfully Shewth

1. That the services appeal No: 853/2015 in respect of MST: Aisha is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4119-24 /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

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

NOTIFICATION.

WHEREAS, ~~Mst. Aisha PST~~ at Government Girls Primary School Thakra District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 2006-15 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 Shanaya where 02 posts were lying vacant. Her name was at S. No. 04 of the merit list of her U/C under EETA R.No.1701532. She was appointed in U/C Karori which is adjacent to her U/C according to the list provided by the DEO(F) Manshera, she was adjusted in GGPS Thakra U/C Karori vide a general order Endst No. 5360-5384 dated 18/05/2012 at S. No. 27.
2. ~~Appeal may be accepted as she is required to be adjusted in adjacent U/C. However if she is comfortable with her posting at present school she may be allowed to continue as usual.~~

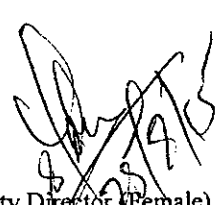
NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 2006-15 dated 03/03/2015 and reinstate Ms. Aisha PST at Government Girls Primary School Thakra District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4119-24 /F.No. 74 /Appeals Female MSR Dated Peshawar the 25/8 /2015

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

1. District Education Officer (Female) Mansehra
2. Sub Divisional Education Officer (Female) Mansehra
3. District Accounts Officer Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


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