

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. _____

1564/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03/12/2013	The appeal of Mst. Sabra Siddique presented today by Mr. M. Asif Yousafzai Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing
2	9-12-2012	This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>31-12-2013</u>


REGISTRAR


CHAIRMAN

31.12.2013

Counsel for the appellant present. Preliminary arguments heard and case file perused. The appellant filed Departmental Appeal on 14.02.2013 against the original order dated 14.01.2013, which has been rejected on 04.11.2013, hence the present appeal on 03.12.2013. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. The impugned order is not a speaking order and in violation of Rule-5 of the Civil Servant (Appeal) Rules-1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents. Appellant has also filed an application for the suspension of recovery order dated 14.01.2013. Notice of application should also be issued to the respondents. To come up for written reply on main appeal on 06.03.2014 as well as reply arguments on stay application on 20.01.2014.

31.12.2013

This case be put before the Final Bench II for further proceedings.

Member

Chairman

20.1.2014

Counsel for the appellant and Muhammad Adeel Butt, AAG with Khursheed Khan, SO, Mosam Khan, AD for respondents No. 1 and 2 present and stated that notices have not been served upon them. None is available on behalf of respondents No. 3 to 5. Notices be issued to all the respondents. To come up for written reply on main appeal as well as reply/arguments on stay application on 17.2.2014. The impugned order to the extent of recovery from the appellant is suspended till the date fixed.

MEMBER

MEMBER

17.2.2014

Counsel for the appellant, and Mr. Muhammad Adeel Butt, AAG with Khursheed Khan, SO for respondent No.1, Sajjad Rashid, AD for respondent No. 2 and Muhammad Bashir, Supdt. for respondents No. 3 and 4 and Muhammad Sajjad, AAO for respondent No. 5 present and requested for time. To come up for written reply on main appeal as well as reply/arguments on stay application on 17.3.2014. The impugned order to the extent of recovery is suspended till the date fixed.

MEMBER

MEMBER

17.3.2014

Counsel for the appellant, and Mr. Muhammad Adeel Butt, AAG with Khursheed Khan, SO, Rehana Yasmeen, SDEO, Peer Muhammad, ADO and Muhammad Sajjad, AAO for the respondents present and requested for time to file joint parawise comments. To come up for written reply on main appeal as well as reply/arguments on stay application on 23.4.2014. Till then status quo is extended.

MEMBER

MEMBER

23.4.2014

Junior to counsel for the appellant and Mr. Ziaullah, GP with Khursheed Khan, SO for respondent No.1, Sajjad Rashid, AD for respondent No.2 and Muhammad Bashir, Supdt. for respondents No. 3 and 4 and Muhammad Sajjad, AAO for respondent No. 5 present and requested for further time. To come up for written reply on main appeal as well as reply/arguments on stay application on 4.6.2014. Status quo, as before, is extended till the date fixed.

MEMBER

MEMBER

04.6.2014

Counsel for appellant and Mr. Muhammad Jan, GP with Mr. Muhammad Bashir, Supdt. and Mst. Saima ADO and Sajjad, AAO for the respondents present and requested for further time. To come up for written reply on main appeal as well as stay application on 17.7.2014. Status quo, as before, is extended till the date fixed.


MEMBER


MEMBER

17.07.2014.

Counsel for the appellant and Mr. Muhammad Jan, GP with Sajjad Rashid, AD for respondents No. 1 & 2 present and requested for time. The learned GP needs time to contact other respondents. To come up for written reply on main appeal as well as reply/arguments on stay application on 18.09.2014. Status quo, as before, is extended till the date fixed.


MEMBER


MEMBER

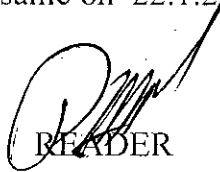
18.09.2014

Counsel for the appellant, and Mr. Kabeerullah, Asstt. A.G with Khursheed Khan, SO, Sajjad Rashid, AD, Mst. Azra Afridi, ASDEO(F) and Muhammad Sajjad AAO for the respondents present and requested for further time. To come up for written reply on main appeal as well as reply/arguments on stay application on 12.11.2014.


MEMBER

12.11.2014

Clerk to counsel for the appellant and Mr. Muhammad Adeel Butt; AAG with Mr. Khursheed Khan, SO and Javed Ahmad; Supdt. for the respondents present. The Tribunal is incomplete. To come up for the same on 22.1.2015.


READER

22.1.2015

Counsel for the appellant present. Mr. Muhammad Adeel Butt, AAG with Muhammad Bashir, Supdt. for the respondents present and submitted before the court that written reply of the respondents is in process of completion and requested for adjournment. Therefore, case is adjourned to 18.2.2015. Till then status quo is extended.


MEMBER

19.2.2015

Counsel for the appellant and Mr. Muhammad Jan, GP with Muhammad Bashir Supdt. for the respondents present. Representative of the respondents submitted that written reply prepared and placed before the respondents for signature. Therefore, case to come up for written reply on 07.4.2015 without fail.


MEMBER

07.4.2015

Counsel for the appellant and Mr. Muhammad Jan, GP with Muhammad Bashir, Supdt. for the respondents present. Written replies have not been submitted despite the fact that last chance was given to the respondents. On assurance of the representative another last chance is given to the respondents for submission of written replies. In case the respondents failed to file written replies, no other chance will be given to them. To come up for written reply on main appeal as well as reply/arguments on stay application on 13.5.2015.


MEMBER

13.05.2015

Counsel for the appellant, M/S Javed Ahmed, Supdt. and Saima Raza, ADO alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder as well as final hearing at Camp Court Abbottabad for 18.8.2015 as the matter pertains to territorial limits of Hazara Division.

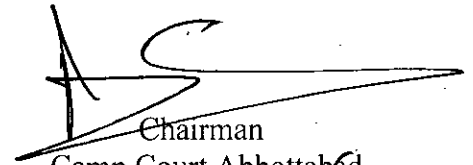

Chairman

18.08.2015

Counsel for the appellant, Ms Saima Raza, ADO and Mr. Bashir Ahmad, Supdt alongwith Mr. Muhammad Tahir Aurangzeb, GP for the respondents present. Rejoinder submitted. Arguments heard and record perused.

Vide our detailed judgment of today in connected appeal No. 1563/2013 titled Robina Shaheen-vs-Secretary Education Government of KPK, Peshawar etc we are of the view that on the basis of the said audit para the respondents should have issued notice to the appellant and should have dealt with the matter in accordance with the prescribed procedure which was not adopted leaving us with no option but to accept the instant appeal and set aside the impugned orders and direct that no recovery be made from the appellant unless the audit para is looked into by the concerned authority in the prescribed manners and an opportunity of hearing is afforded to him where-after decision deemed appropriate ~~be~~ taken by the authority. The appeal is accepted in the above terms. Parties are left to bear their own costs. File be consigned to the record.


Member


Chairman
Camp Court Abbottabad
18.08.15

ANNOUNCED
18.08.2015

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

Appeal No. 1564 /2013

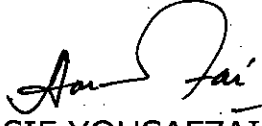
Mst: Sabra Siddique V/S Education Department.

INDEX

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-03
2.	Stay Application & Affidavit	----	04-05
3.	Copy of Register & Report	- A -	6-17
4.	Copy of Order (14.01.2013)	- B -	18-
5.	Copy of Appeal	- C -	19-
6.	Copy of Order (04.11.2013)	- D -	20-
7.	Vakalat Nama	-----	21-

APPELLANT

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

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

Appeal No. 1564 /2013

Mst. Sabra Siddique, PST,
GGPS, Kanger Amgah, Haripur.

N.W.F. Province
Government of Khyber Pakhtunkhwa
Education Department
Haripur
No. 1617
Dated 03/12/13

APPELLANT

VERSUS

1. The Secretary, Government of Khyber Pakhtunkhwa, Education (E&SE) Department, Civil Secretariat, Peshawar.
2. The Director of Education (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Female) Haripur.
4. The Sub-Divisional Education Officer, (Female), Haripur.
5. The District Accounts Officer, Haripur.

RESPONDENTS

.....

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 04.11.2013 WHEREBY THE APPEAL AGAINST THE RECOVERY ORDER DATED 04.01.2013 HAS BEEN REJECTED FOR NO GOOD GROUND.

.....

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 04.11.2013 AND 04.01.2013 MAY BE DECLARED AS ILLEGAL VOID ABINITIO AND MAY BE SET ASIDE. THE RESPONDENTS MAY FURTHER PLEASE BE DIRECTED TO REFUND THE RECOVERED AMOUNT MADE IN VIOLATION OF LAW AND RULES. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

3/12/13

RESPECTFULLY SHEWETH:

1. That the appellant is a regular employee of the Education Department has been performing her duty as PST at GGPS Kanger Amgah Haripur.
2. That the appellant was regularly performing he duty in the above noted School and never remained absent from her duties in an un-authorized manner. Copy of Attendance Register and Report is attached as Annexure-A.
3. That up to the astonishment of the appellant, the recovery order was passed on 14.01.2013 for the reasons of so-called absence. In the said order the amount of Rs.118258/- was ordered to be recovered from the appellant. Copy of Order is attached as Annexure-B.
4. That the appellant filed an appeal against the said recovery order and the same was rejected for no good grounds on 4.11.2013. Copies of Appeal and Rejection Oder are attached as Annexure-C and D.
5. That now the appellant comes to this Honourable Tribunal on the following grounds amongst the others.

GROUND:

- A) That the order dated 14.01.2013 and 04.11.2013 are against the law, facts, material on record and norms of justice and liable to be set aside.
- B) That the recovery order has been passed in total violation of law and rules and even proper procedures was not adopted while passing the order.
- C) That the appellant was never remained absent from the duty and was present throughout as evident from the record.
- D) That the appellant has been condemned un-heard because the recovery is a punishment and while awarding such punishment, charge sheet, show

cause notice and enquiry are mandatory while in case of appellant no such procedures was adopted.

- E) That neither the regular enquiry was conducted nor the appellant was heard in person which amounts to **AUDI ALTERAM PARTEM**.
- F) That the whole action of the respondents is arbitrary in nature and not sustainable in the eyes of law.
- G) That not even final rejection order is not a speaking order which is also violation of Section-25(A) of the General Clauses Act and Judgment of the Supreme Court of Pakistan reported as 1991 SCMR Page-2330.
- H) That the appellant has not been treated according to law and rules.
- I) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.

APPELLANT *Sabira Siddique*
Sabra Siddique

THROUGH:

M. Asif Yousafzai
(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

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

Appeal No. _____/2013

Mst. Sabra Siddique

V/S

Education Department.

**APPLICATION FOR SUSPENDING THE
OPERATION OF RECOVERY ORDER DATED
14.01.2013 TILL THE DISPOSAL OF MAIN
APPEAL.**

RESPECTFULLY SHEWETH:

1. That the appellant has filed an appeal along with this application which no date has been fixed so far.
2. That the appellant has a good prima facie case and all the ingredients are in favour of the appellant necessary for suspension of order dated 14.01.2013.
3. That the order dated 14.01.2013 has been passed in total violation of law and rules.
4. That the grounds of main appeal may also be integral part of application.
5. That as the recovery order has been passed without following proper procedure and law and if it not suspended then the appellant would be suffer a lot specially it will amount to penalizing the appellant for no fault.

6. That if the recovery order is not suspended then the main appeal would become infructuous due to completion of penalty.

It is, therefore, most humbly prayed that the operation of order dated 14.01.2013 may be suspended till the disposal of main appeal. Any other remedy with this august Tribunal deems fit may also be awarded in favour of appellant.

Appellant *Sabira Siddique*
Sabra Siddique

Through:

M. Asif Yousafzai
(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

It is affirmed and declared that the contents of the above Application are true and correct to the best of my knowledge and belief.

Sabira Siddique
Deponent

- 2/10/11

A (6)

CERTIFICATE OF CLEARANCE IN CLUSTER

Certified that Mstt: Sabira Saddiqa Bibi D/O Abaidur Rehman PTC teacher was working at GGPS Kangar Aamgah Haripur under the Cluster GHSS Kakotri Haripur. She performed her duty during cluster period i.e. 01-07-2010 to 31-01-2011 regularly, and her salary was drawn and paid to ~~him~~ her.

ELI v.l.

Principal,

GHSS Kakotri Haripur

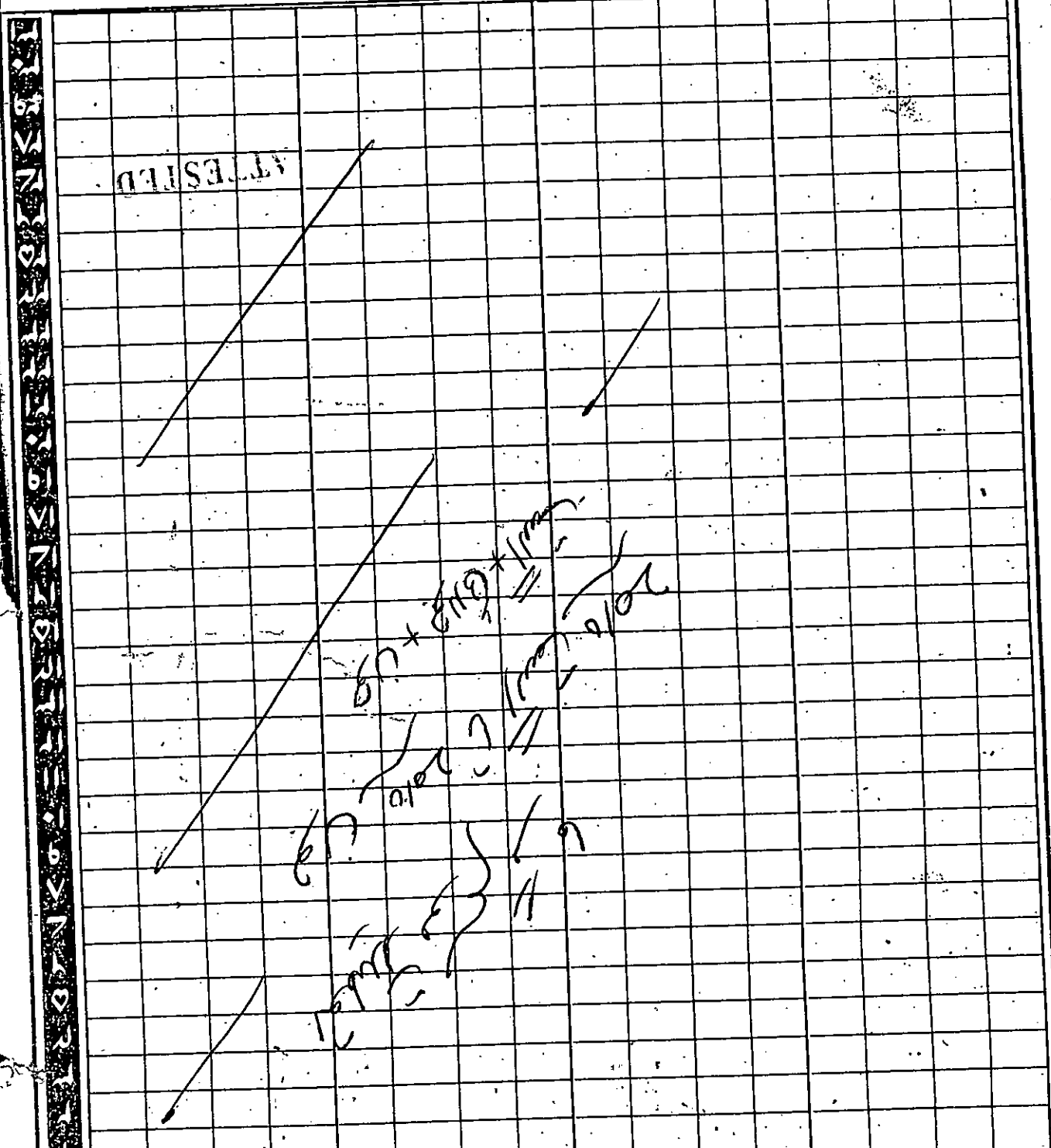
PRINCIPAL
G.H.S.S. Kakotri
Distt Haripur

24.9.2012

ATTESTED

(Signature)

۹۰	۸۰	۷۰	۶۰	۵۰	۴۰	۳۰	۲۰	۱۰	۰



--	--	--	--	--	--	--	--	--	--

WALLBEE (M/AR/PE)
 W/M/JUN/JUL/AR/AG
 SEP/OCT/NOV/DEC

۹۹۸۵ Kanser Amsyah
 ۲۰۱۰
 ۲۰۱۰

(Signature)

روز	ای	دو	سه	چهار	پنج	شنبه	یکشنبه
روز	ای	دو	سه	چهار	پنج	شنبه	یکشنبه

12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12:45	12:45	12:45	12:45	12:45	12:45	12:45	12:45
7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30

SEP OCT NOV DEC
MAY JUN JUL AUG
DST 11/7 05:00 PM
DST
DST

9

Chowk

P.S.T.

تاریخ	آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	تاریخ
	P	-	P	-									1
	P	-	P	-									2
	P	-	P	-									3
	P	-	P	-									4
	P	-	P	-									5
	P	-	P	-									6
	P	-	P	-									7
	SUN DAY												8
													9
	P	-	P	-									10
	P	-	P	-									11
	P	-	P	-									12
	P	-	P	-									13
	SUN DAY												14
													15
	P	-	P	-									16
	P	-	P	-									17
	P	-	P	-									18
	P	-	P	-									19
	P	-	P	-									20
	P	-	P	-									21
	P	-	P	-									22
	P	-	P	-									23
	P	-	P	-									24
	P	-	P	-									25
	P	-	P	-									26
	P	-	P	-									27
	P	-	P	-									28
	P	-	P	-									29
	P	-	P	-									30

حالت	میزان	سابقہ	حالت	میزان	سابقہ	حالت	میزان	سابقہ	حالت	میزان	سابقہ	حالت	میزان	سابقہ

Head Teacher

P.S. Kangar Amga

Distt: Haripur

دستخط ہیڈ ماسٹر

SEP OCT NOV DEC

سرکاری پبلک اسکول

2010

مئی

(11)

SEP

Chowk

P.T. INT.

D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
/ / /			SUN DAY		/ / /						SUN DAY	
D - P -											C/Leave -	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 12:00 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
X X X			X SUN DAY X		X X X						SUN DAY X	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
/ / /												
D - P -											\$ 1:35 \$ 8:30	
X X X			X SUN DAY X		X X X						SUN DAY X	
D - P -											ON DUTY \$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 1:35 \$ 8:30	
D - P -											\$ 12:00 \$ 8:30	
/ / /												
/ / /												
/ / /												
/ / /												
/ / /												

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

بھ	ح	بھ	ح	بھ	ح	بھ	ح	بھ	ح	بھ	ح

Head Teacher
G.C.P.S Mangar Amran

دستخط ہیڈ ماسٹر

MASTER BOOK CENTER, 16 URDU BAZAR, LAHORE, Ph: 7232206

Head Teacher
G.C.P.S Kanga

نام	پست	مقررہ
	PST/HTO	

وقت	روز	پہلی	دو	تیسری	چوتھی	پانچ	ششمی	ساتھ	آٹھ	نہ	بھ	
		P	-	P	-				\$ 1:35	\$ 8:30		
		P	-	P	-				\$ 1:35	\$ 8:30		
		P	-	P	-				\$ 1:35	\$ 8:30		
		P	-	P	-				\$ 12:00	\$ 8:30		
		P	-	P	-				C/Leave			
		SUN DAY					SUN DAY					
		P	-	P	-				\$ 1:35	\$ 8:30		
		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
		P	-	P	-				\$ 12:00	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
		SUN DAY					SUN DAY					
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 12:00	\$ 8:30		
7:30		P	-	P	-				C/Leave			
		SUN DAY					SUN DAY					
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 12:00	\$ 8:30		
7:30		P	-	P	-				C/Leave			
		SUN DAY					SUN DAY					
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		23 مارچ					23 مارچ					
		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				Result	App		
		SUN DAY					SUN DAY					
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:35	\$ 8:30		
7:30		P	-	P	-				\$ 1:00	\$ 8:30		

میزان	سالہ	مال	میزان	سالہ	مال	میزان	سالہ	مال	میزان	سالہ	مال

(05) 04 01

P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	

P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	

MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
2011							

Handwritten signature and notes at the bottom of the page.

پست
پست

آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی
X			SUN DAY	X				SUN DAY	X					
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
X		X	SUN DAY	X				SUN DAY	X					
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
X		X	SUN DAY	X				SUN DAY	X					
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
X		X	SUN DAY	X				SUN DAY	X					
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
P	-	P												
X		X	SUN DAY	X				SUN DAY	X					
P	-	P												
P	-	P												

حالت	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری



OFFICE OF THE SUB DIVISIONAL EDUCATION
OFFICER (FEMALE) HARIPUR

B
18

No. 49-62 / 1

Dated Haripur the 14 / 11 / 2013

To.

- | | | |
|---|------------------|--------|
| ✓ 1. Rizwana Siddique PST | 2010-11.300278/- | Kahaka |
| ✓ 2. Sadia Mehfooz PST GGPS Kahaka ✓ | 149963/- | |
| ✓ 3. Haseena Saheen PST GGPS Kahaka ✓ | 150593/- | |
| ✓ 4. Riaz Bibi PST GGPS Pharallah ✓ | 333155/- | |
| ✓ 5. Asmat Ara PST GGPS Pharallah ✓ | 226030/- | |
| ✓ 6. Gulnaz PST GGPS Pharallah ✓ | 227672/- | |
| ✓ 7. Shafqat Zohra GGPS Pharallah ✓ | 252347/- | |
| ✓ 8. Raheela Begum PST GGPS Pharallah ✓ | 62496/- | |
| ✓ 9. Jamila Bibi PST GGPS Pharallah ✓ | 150483/- | |
| ✓ 10. Arshad Mehmood Chow GGPS Pharallah ✓ | 116157/- | |
| ✓ 11. Mehnaz Zaib PST GGPS Kakotri ✓ | 180742/- | |
| ✓ 12. Samina Shaheen PST GGPS Kakotri ✓ | 152732/- | |
| ✓ 13. M. Siddique Chow GGPS Kakotri ✓ | 112179/- | |
| ✓ 14. Sabra Siddiqi PST GGPS Kanger Amgah ✓ | 118258/- | |
| ✓ 15. Mussrat Bibi PST GGPS Kanger Amgah ✓ | 275779/- | |
| ✓ 16. Munir Khan Chow:: GGPS Kanger Amgah ✓ | 111363/- | |

Subject:-

RECOVERY OF OVERPAYMENT BY THE AUDIT PARTY ON THE REPORT OF ADO

Memo:-

It is stated to inform you that on report of Mst, Azra Afridi regarding unauthorised absent for the period noted against the name of each, the advance paras were developed by District Audit team and the same were discussed in the Meeting of DAC held on 27-28/11/2012, it has been decided that the over payment pointed out by the circle officer for absent period should be recovered from the concerned staff.

Therefore the period and amount recoverable from you is recorded against the name of each a/w absent period as pointed out by the circle ADO to the audit party for your information with the remarks the same may be deposited in Govt. treasury through office within 30 days in case of non deposited the overpayment in question will be recovered from your salary in instalment from February, 2013.

U SDEO (F)
HARIPUR
SUB DIVISIONAL EDUCATION

ATTESTED

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر زنانہ مدارس ضلع ہری پور
مضمون :- اپیل بابت مراسلہ نمبر 62-49 مورخہ 14-1-2013
برائے منسوخی آرڈر ریکوری۔

جناب عالیہ۔

گزارشات درج ذیل ہیں۔

- (1) یہ کہ فدوہ کی تقرری بطور پی ٹی سی محلہ محکمہ تعلیم میں مورخہ 2-9-2009ء پر قرار پائی۔
- (2) یہ کہ فدوہ نے چارج حاصل کرنے کے بعد تاریخ تقرری سے اب تک اپنے فرائض منصبی بطریق احسن سرانجام دے رہی ہے۔
- (3) یہ کہ فدوہ کو بابت غیر حاضری کوئی محکمہ کی طرف سے نہ تو نوٹس ملا اور نہ ہی میں کبھی غیر حاضر رہی۔ اپنے فرائض بطریق احسن ہمیشہ سرانجام دینے اور محکمہ کو مجھ سے کبھی کوئی شکایت نہیں ہوئی۔
- (4) یہ کہ اچانک مجھے یہ نوٹس موصول ہوا جس میں میرے ذمے غیر حاضری کے پیریڈ کی 118258 روپے ریکوری ظاہر کی گئی ہے۔ جس سے مجھے انتہائی صدمہ ہوا۔ اس لئے کہ محکمہ نے میرے ساتھ اس ضمن میں نہ تو کبھی کوئی خط و کتابت کی ہے اور نہ ہی میں ڈیوٹی سے غیر حاضر ہوئی۔
- (5) یہ کہ میرے علم میں یہ بات بھی ابھی تک نہیں ہے کہ یہ مجھ سے کس پیریڈ کی ریکوری کر رہے ہیں اور کیوں کر رہے ہیں۔ لہذا ابھی یہ اپیل ملتمس ہوں کہ اس مراسلہ نمبر 62-49 مورخہ 14-1-2013 کو میری اپیل منظور کرتے ہوئے منسوخ کیا جائے بصورت دیگر فدوہ یہ حق محفوظ رکھتی ہے کہ اس ضمن میں عدالت عالیہ یا دیگر کسی اتھارٹی سے انصاف کے لئے رجوع کرے

العارض

Sabina Siddiqua Bibi

صابرہ صدیق پی ایس ٹی گورنمنٹ گرلز پرائمری سکول کنگڑہ عمگاہ

9/2/13

ATTESTED



Office of the District Education Officer Female

Haripur

Tel No: 0995-613244 Fax: 0995-615140

No. 8749 /

Dated: 4 / 11 / 2013.

20

To

- ✓ Safia Razzaq, PST GGPS Kupri (Amazai) Haripur
- ✓ Nazia Bibi, PST GGPS Balanda Haripur
- ✓ Ghazala Shaheen, PST GGPS Degra (Amazai) Haripur
- ✓ Neelam Bano, PST GGPS Kingraoh Haripur
- ✓ Musarat Bakhat, PST GGPS Gul Doga Haripur
- ✓ Samina Shaheen, PST GGPS Kakotari Haripur
- ✓ Musarat Bibi, PST GGPS Kingar Hamgah Hariipur
- ✓ Asia Bibi, PST GGPS Guldoga Haripur
- ✓ Munir Khan, Chowkidar GGPS Kingar Amagah Hariipur
- ✓ Muhammad Siddique, Chowkidar GGPS Kakotari Haripur
- ✓ Gul Rehman, Chowkidar GGPS Doga Haripur
- ✓ Aneesa Bano, PST GGPS Kupri (Amazai) Haripur
- ✓ Tahira Bibi, PST GGPS Shingri (Amazai) Haripur
- ✓ Nusrat Bibi, PST GGPS Gul Doga Haripur
- ✓ Shafqat Zohra, PST GGPS Pharhala Haripur
- ✓ Rashid Mehmood, Chowkidar GGPS Pharhala Haripur
- ✓ Robina Shaheen, PST GGPS Zahida (Amazai) Haripur
- ✓ Shazia Rasheed, PST GGPS Kupri (Amazai) Haripur
- ✓ Gul Naz, PST GGPS Pharhala Haripur
- ✓ Asmat Ara, PST GGPS Pharhala, Haripur
- ✓ Sabira Siddique, PST GGPS Kinger Amagah
- ✓ Mehnaz Zeb, PST GGPS Kakotari Haripur
- ✓ Riaz Bibi, PST GGPS Pharhala Haripur
- ✓ Sahdia Mahfooz, PST GGPS Kahaka Haripur
- ✓ Haseena Shaheen, PST GGPS Kahaka Haripur
- ✓ Raheela Begum, PST GGPS Pharhala
- ✓ Jameela Bibi, PST GGPS Pharhala
- ✓ Rizwana Siddique, PST GGPS Kahaka
- ✓ Saira Bibi, PST GGPS Gul Doga

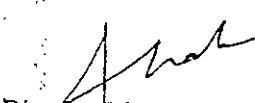
Subject:

APPEAL

Memo,

Reference your appeal for non-recovery of over payments.

It is stated to inform you that the recovery of over payment is under process by implementing the audit observation, therefore, this office is unable to accept your appeal at this stage, hence rejected.


District Education Officer (F)
Haripur

ATTESTED

VAKALAT NAMA

NO. _____/20

IN THE COURT OF Service Tribunal Peshawar

Saba Siddique (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Dept. (Respondent)
(Defendant)

I/We Saba Siddique (Appellant)

Do hereby appoint and constitute **M.Asif Yousafzai, Advocate, Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

Sabira Siddiqu
(CLIENT)

ACCEPTED

M. Asif Yousafzai
M. ASIF YOUSAFZAI
Advocate

M. ASIF YOUSAFZAI
Advocate High Court,
Peshawar.

OFFICE:
Room No.1, Upper Floor,
Islamia Club Building,
Khyber Bazar Peshawar.
Ph.091-2211391-
0333-9103240

BEFORE THE SERVICE TRIBUNAL PESHAWAR KPK

SERVICE APPEAL NO
1579/2013

Sabira Sadiq PTC GGPS Kangar Amgah Haripur

(Petitioner)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary E&SE Department, Peshawar.
2. Director Elementary & Secondary Education, Peshawar.
3. District Education Officer (F) Haripur
4. Sub Divisional Education Officer (F) Haripur
5. District Accounts Officer Haripur

(Respondent)

Respectfully Sheweth:-

Para wise Comments for & on behalf of respondent No: 1,2 & 3.

Preliminary Objections

1. That the appellant has got no locus standi to file the instant appeal.
2. That appellant has concealed the material facts from this honorable Tribunal, hence liable to be dismissed.
3. That the appellant has filed the instant appeal just to pressurize the respondents.
4. That the appeal is time barred.
5. That the appeal is bad for non joinder /mis joinder necessary parties.

Reply /Comments on facts.

1. Para 1 pertain to the record.
2. Audit Officer relied on the oral report ASDEO Azra Afridi on absence teachers. Departmental Accounts Committee consequently ordered to recover. The impugned was issued according to law. (Copy Of Para NO 93 is attached as Annexure (A).
3. Correct to the extent that recovery order has been passed against all absent teachers and Absent staff.
4. Correct to the extent of issuing Appellant order.
5. That this appellant has got no cause of action to file instant appeal.

Grounds.

- A. In correct. The action of the department is legal lawful and according to the rules neither discriminatory nor arbitrary.

B. Incorrect and not admitted. As replied below

Incorrect after fulfilling all the codel formalities.

C. Enquiry Committee has already given finding .(Copy of Report is attached as Annexure (B).

D. Incorrect and not admitted. The statement of the appellant is against the fact.

E. Incorrect, the action of the department is not arbitrary and discriminatory hence whole Para is denied.

F. Incorrect. The rejection order is a according to law.

G. Incorrect. The appellant has not been treated according to law and rules.

H. Incorrect As Paras above.

I. That the Respondents Seek Permission to advance others grounds and proofs at the time of hearing

Prayer:

In the view of the above submission it is requested that this Honorable Tribunal may graciously be pleased to dismissed the appeal of appellant with cost please.

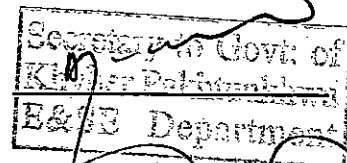
Respondents.

1. The Secretary : E&SE Department KPK
Peshawar Respondent No: 1

2. The Director Elementary &Secondary
Education Peshawar Respondent No: 2

3. District Education Officer (F)Haripur

4. Sub Divisional Education Officer (F)Haripur



D.E.O (F)
Haripur

SUB DIVISIONAL
EDUCATION OFFICER
FEMALE HARIPUR

Roots

Rehik & Bism s/o Mera Bism

NIC 13302-7929457-0

1) SSC (A) 2007 606/950

2) PA (A) 2008

3) BA (A) 2011

4) JTC (A) 2011

5) DM 2012

6) BED 2014 579/1000 (A) 2012

7) MIA (Mumbai) 2015 (A) 2012

583/1900, CIVIS, Geography.
284/550, HPE, Geography.
579/800, P.D.L, JALAN
888/1000 (Lagan) P.H. DANCE, PISHA

GGPS KANGAR AMGAH DISTT HARIPUR

- 1... SABIRA SADIQUE ..PST
- 2...MUSSARAT BOSTAN PST
- 3...MUNIR KHAN CHOWKIDAR.

1---MST SABIRA SADIQUE PST according to cluster in charge 1-7-2010 to 31-1-2011. The teacher was present on duty, so this period problem is solved. It means no recovery is required.

2--- MST MUSSARAT BOSTAN PST, 2-9-2009 to 31-8-2010 (222 DAYS) was on ex- Pakistan leave, that is sanctioned, so as leave is sanctioned as no, recovery is needed. While 1-9-2009 to 21-2-2011 no evidence of leave have taken or no, cogent evidence and this period is 5 months, 20 days. This recovery is essential so , it could be recovered.

3---MUNAIR KHAN CHOWKIDAR is local and is remained in same village. AS the teacher was not going to school that's why he is not going to school so, his recovery could be finished.

1. Chowkidar remained on duty for 24 hours.
2. He is local and can't remained absent from school.
3. He is so old and not to do any sort of work and that is why he is absent from school?

Dabeela

HEADMISTRESS
GGHS KANGRA COLONY
(HARIPUR)

for
HEAD-MISTRESS
G.G.H. School
Baghpur-Dheri Haripur

23-8



OFFICE OF THE SUB DIVISIONAL EDUCATION
OFFICER FEMALE HARIPUR
Phone No.0995-610814

No. 536 Dated H.Pur the, 15/04/2013.

To,

The Deputy Commissioner,
Haripur.

Subject:- ARRANGEMENT OF RE-DAC MEETINGS
Memo:-

Reference to the subject noted above it is stated that DAC meeting for the year 2010-2011 for discussion of advance paras in respect of the office of undersigned was held on 27-28-11-2012.

It is brought to you kind notice that the said DAC meeting was attended by the undersigned, while DCO Haripur was not personally available in the said meeting due to his official engagements and the meeting was chaired by EDO (F&P).

All paras relating to the office of undersigned were stand for recovery inspite of production of all valid proof regarding settlement of paras.

Therefore you are humbly requested that the Re--DAC meeting may kindly be arranged in your presence.


SUB DIVISIONAL EDUCATION
OFFICER (FEMALE) HARIPUR

OFFICE OF THE SUB DIVISIONAL EDUCATION

OFFICER (FEMALE) HARIPUR

No. 49-62 /

Dated Haripur the 14/01/2013

To:

- Recd.*
- | | |
|--|----------|
| 1. Rizwana Siddique PST | 300278/- |
| 2. Sadia Mehfooz PST GGPS Kahaka - | 149963/- |
| 3. Haseena Saheen PST GGPS Kahaka - | 150593/- |
| 4. Riaz Bibi PST GGPS Pharallah - | 333155/- |
| 5. Asmat Ara PST GGPS Pharallah - | 226030/- |
| 6. Gulnaz PST GGPS Pharallah - | 227672/- |
| 7. Shafqat Zohra GGPS Pharallah - | 252347/- |
| 8. Raheela Begum PST GGPS Pharallah - | 62496/- |
| 9. Jamila Bibi PST GGPS Pharallah - | 150483/- |
| 10. Arshad Mehmood Chow GGPS Pharallah - | 116157/- |
| 11. Mehnaz Zaib PST GGPS Kakotri | 180742/- |
| 12. Samina Shaheen PST GGPS Kakotri | 152732/- |
| 13. M. Siddique Chow GGPS Kakotri | 112179/- |
| 14. Sabra Siddiqi PST GGPS Kanger Amgah | 118258/- |
| 15. Mussrat Bibi PST GGPS Kanger Amgah | 275779/- |
| 16. Munir Khan Chow:: GGPS Kanger Amgah | 111363/- |
- 20/0-11*

Subject:- RECOVERY OF OVERPAYMENT BY THE AUDIT PARTY ON THE REPORT OF ADO

Memo:-

It is stated to inform you that on report of Mst, Azra Afridi regarding unauthorised absent for the period noted against the name of each, the advance paras were developed by District Audit team and the same were discussed in the Meetint of DAC held on 27-28/11/2012, it has been decided that the over payment pointed out by the circle officer for absent period should be recovered from the concerned staff.

Therefore the period and amount recoverable from you is recorded against the name of each a/w absent period as pointed out by the circle ADO to the audit party for your information with the remarks the same may be deposited in Govt. treasury through office within 30 days in case of non deposited the overpayment in question will be recovered from your salary in instalment from February, 2013

Copy to the DEO (F) Haripur.

[Signature]
DEO (F)
HARIPUR
SUB DIVISIONAL EDUCATION

MINUTES OF DEPARTMENTAL ACCOUNTS COMMITTEE MEETING HELD ON 27-28 NOVEMBER 2012

The DAC meeting was held on 27-28 November 2012 under the Chairmanship of Syed Mujeeb ur Rehman (District Coordination Officer / Chairman DAC Haripur) to discuss the Advance Para's relating to the Account-IV of the District Haripur for the year 2011-12 & 12-13. The meeting was attended by Messrs Asadullah Khan (Director Audit, Hazara Region, Abbottabad), Muhammad Asif (EDO (F&P) Haripur), Dr. Mazhar Ali Shah (EDO, Health Haripur), Muhammad Shoukat (EDO E&SE, Haripur), Abdur Rahim (Executive Engineer, PHE Haripur), Fiaz Muhammad (Executive Engineer, C&W Haripur), Dr. Muhammad Zakim Khan Wazir (Medical Superintendent, DHQ Hospital Haripur), Muhammad Nisar (District Director, Agriculture Extension Haripur), Abdul Haleem (District Planning Officer, P&D Haripur), Sadiq Hussain (Audit Officer), Mian Sajid Hussain (DDO Finance), Altaf Hussain (DDO Finance) and Abdur Rashid (DO Finance) Haripur, Asif Shehzad Assistant I&P, Liaqat Ali Assistant F&P.

The meeting was started with the recitation of the verses from the Holy Quran. The chair welcomed the participants and emphasized upon the importance of the DAC at District level and advised all the head of departments to pay more attention while going to reply to the audit observations. He further added that the Departments must have to submit the reply of the Draft Para's of Audit Report 2011-12 within the 7 days so as the same could be transmitted to the concerned quarter. The meeting proceeded as per agenda item and the decision of DAC is reported against each Advance Para as under:-

Name of Department	AP #	Gist of Para	DAC Decision
Health Department	01	Non deduction of 1% stamp duty Rs180,634/-	As the clarification by Govt of Khyber Pakhtunkhwa Board of Revenue and Estate department vide No. 9974-10047 dated: 30/4/2012 was produced to audit therefore recovery of stamp duty should be effected on purchases made as on or after 01.05.2012. Purchases of this period shall be verified within 15 days.
	02	Loss to government due to non deposit of receipts Rs558152/-	EDO (Health) shall submit the reconciliation of receipt and number of patients in BHUs within 15 days to audit.
	03	Misappropriation on account Vehicle Repair charges - Rs60,840/-	Major repair was required, only tyres were purchased against the released amount but the vehicle could not be made functional due to lack of funds. Therefore, Department shall arrange the requisite funds for repair of the said vehicle which will be made running condition within one month. Therefore, Para may be settled.
	04	Loss to Government on account of non deduction of conveyance allowance - Rs1.376 million.	Para stand till recovery from the health staff occupying the official accommodation within the premises of health facility.
	05	Non production of auditable record	The auditable record was produced before DAC and verified. Therefore, Para may be settled.
	06	Willful Absence from duty	The doctor was reported as habitual and regular absentee as such who was not taking interest in his official job. Therefore, it was decided that the Para shall stand till decision by the Competent Authority / Provincial Government in this regard.
	07	Wasteful expenditure on account of purchase of equipments for Type D Dingi Hospital Rs10.049 million	Para relates to Account-I.
	08	Unauthorized grant of leave during probation	Para stands till obtaining ex-post facto sanction from the competent authority for regularization of EOL and probation period should be extended for another year.
	09	Non deduction of income tax from the suppliers - Rs 230,762/-	Para stand till recovery of Income Tax from suppliers except Type-D Hospitals.
	10	Overpayment of Rs61,986 on account of GST	Para stand till recovery of GST from supplier.
	11	Irregular purchase of medicines - Rs1.93 million	Others needs like epidemic, processions, accidents etc are also met from these heads. Therefore, Para may be settled.
	12	Loss to government due to payment of pay & allowances for absent period - Rs117,000/-	Para stands. The amount of pay & allowances Rs117,000 should be deposited and challans be produced to audit.
Medical Superintendent, DHQ Hospital	13	Non deduction of 1% stamp duty Rs274206	As the clarification by Govt of Khyber Pakhtunkhwa Board of Revenue and Estate department vide No. 9974-10047 dated: 30/4/2012 was produced to audit therefore recovery of stamp duty should be effected on purchases made as on or after 01.05.2012. Purchases of this period shall be verified within 15 days.
	14	Misappropriation on account of OPD Pads Rs162,000	Para stands till recovery of Rs162,000.
	15	Non compliance to the economy measures	EDO (Health) office located in the premises of WCH, EDO office is using gas and electricity from the connection of DHQ Hospital / WCH which needs to be reconciled with

17

Agriculture Extension Department

Water Management Department

DDO (Female), E&SE Department

	amounting to Rs 19.558 Million and non maintenance of expenditure record.	department from the authority concerned regarding audit of PTC funds.
70	Non recovery of overpayment of Rs. 548,758 on account of pay and allowances	It was decided that the Department shall produce the recovery challan to audit within 15 days. Para stands.
71	Unauthorized blockage of funds amounting to Rs 224935.	Para stands till clarification by the administrative department from the authority concerned regarding audit of PTC funds.
72	Non maintenance of expenditure record for Rs.13.371 million on account of PTC funds.	Para stands till clarification by the administrative department from the authority concerned regarding audit of PTC funds.
73	Non recovery of Income Tax amounting to Rs.43250/-	The recoverable amount on account of Income Tax was deposited vide challan # 3 dated: 11.07.2012 for Rs. 43250/- which were produced to DAC. Hence, Para may be settled.
74	Non production of Auditable record regarding Farm Services Centers.	According to clause 31(c) of Account Procedure of the project, by Laws of the MFSC and FSC, annual audit will be conducted by the Agriculture Extension Department. The said report shall be produced to audit within 15 days. Para stands.
75	Non-deduction of income tax Rs.40789/-	The recovery of Rs. 40789/- on account of Income Tax shall be shown to audit within 15 days. Para stands.
76	Non recovery of sales tax amounting to -Rs.95810	As seeds and pesticides are exempted from Sales Tax. Para may be settled.
77	Overpayment of Rs 516,567.	Deposit slip and bank statement for the month of June 2012 was produced to DAC and it was verified by audit. Expenditure may be regularized from Finance Department. Hence, Para stands till regularization.
78	Overpayment due to allowing higher rates amounting-Rs 155,199.	Date July 2009 to June 2010 was erroneously typed as 1 st April to 30 June 2009 the mistake is verified from the date written under the signature of rate assessment committee and the same were verified by the EDO F&P Haripur. Therefore para is recommended for settlement.
79	Irregular payment of -Rs591, 944 without verification by Nespak.	Report of NESPAK produced and verified by the Audit. Therefore, Para may be settled.
80	Overpayment of Rs. 67,055/-	Amount covered in Revised Technical Sanction and is verified by NESPAK. Hence, Para may be settled.
81	Non recovery of Income Tax- Rs.61,748/-	Recovery challan produced to DAC and it was verified by audit. Hence, Para may be settled.
82	Overpayment of Rs.173,214/-	Amount recovered and utilized in other schemes. Regularization of expenditure is required from Finance Department. Hence, Para stands till regularization.
83	Non recovery of account overpaid to WUA-Rs. 45,812/-	Amount recovered and utilized in other schemes. Regularization of expenditure is required from Finance Department. Hence, Para stands till regularization.
84	Unauthorized expenditure on account of pay & allowances of detailed staff-Rs494,337/-	Para stands till production of repatriation orders within 15 days.
85	Unauthorized payment of incentive allowance-Rs82,989/-	The overpayment of Rs. 82989/- on account of incentive allowance shall be recovered and it will be shown to audit within one month. Para stands.
86	Loss to Government due to impersonation of teachers in schools - Rs376,534/-	The matter shall be investigated through a Joint Inquiry Committee which will be notified by the Administrative Department and the report will be produced to audit within one month. Para stands.
87	Unauthorized payment of pay & allowances for absent period-Rs246,184/-	The pay & allowances authorized to the staff during their absent shall be recovered within one month which will also be shown to audit. Para stands
88	Loss to government & community due to non functional schools	The matter shall be investigated through a committee which will be notified by the Department and the detailed report will be produced to audit within one month.
89	Overpayment on account of pay & allowances Rs.86210/-	Recovery started. Para stands till full recovery.
90	Misappropriation on account of PTC Funds-Rs. 347,669/-	Physical verification of the work to ascertain the report of ADD Circle. Para stands.
91	Unauthorized payment of salaries of staff of closed school - Rs.220,497/-	Para stands till complete recovery besides disciplinary action against the person(s) at fault within one month.
92	Unauthorized payment of salaries of staff of closed school-Rs.149,573/-	Para stands till complete recovery besides disciplinary action against the person(s) at fault within one month.
93	Unauthorized payment of salaries-Rs.580,834/-	Para stands till complete recovery besides disciplinary action against the person(s) at fault within one month.
94	Unauthorized payment of salaries	Para stands till complete recovery besides disciplinary

95	to absent staff-Rs.1.368 million. Unauthorized payment of salaries of staff of closed school-Rs. 935,225/-	action against the person(s) at fault within one month. Para stands till complete recovery besides disciplinary action against the person(s) at fault within one month.	
96	Unauthorized payment of salaries of staff of closed school-Rs445,653/-	The Department neither initiate any action against the teacher after passing 5 months nor justified the DAC. In light of the evidences, the recovery should be initiated within one month.	
97	Unauthorized payment of salaries for absent period-Rs108,372/-	The Competent Authority i.e DCO reverted the order of EDO(E&SE) as such the absent period of the said teacher was regularized. Keeping the ground realities in view para may be settled.	
98	Unauthorized payment of salaries to absent staff-Rs314,521/-	Para stands till conduction of inquiry by District Government in the light of report of ADD circle within one month.	
99	Unauthorized payment of salaries to absent staff-Rs505,397/-	Para stands till complete recovery besides disciplinary action against the person(s) at fault within one month.	
100	Unauthorized payment of salaries to staff of closed school-Rs227,569/-	Para stands till complete recovery besides disciplinary action against the person(s) at fault within one month.	
101	Unauthorized payment of salaries to staff of closed school-Rs176,667/-	Para stands till production of record i.e recommendations of ADD for release of her salary or recovery within a week.	
102	Unauthorized payment of salaries to absent staff-Rs656,960/-	Para stands till full recovery.	
103	Loss due to impersonation of teachers-Rs154,120/-	Para stands till full recovery.	
104	Unauthorized payment of salaries to staff of closed school-Rs449,523/-	Para stands till conduction of inquiry by District Government in the light of report of ADD circle within one month.	
105	Missing of Official Vehicle and driver	DAC decided that the vehicle should hand over to the original allottee. Para stands till production of proper handing taking.	
106	Appointment of Ghost teachers	Para stands till conduction of inquiry by District Government within one month.	
E&SE Department	107	Unauthorized payment out of scout funds-Rs. 387,274	As per Bank Statement, the unauthorized with drawl was refunded / recovered. The Department was directed to avoid such practice in future. Therefore, Para may be settled.
	108	Unauthorized payment of incentive allowances -Rs.175276	Verification shall be made by audit within one month, therefore, Para stands.
	109	Unauthorized payment of advertisement charges - Rs 11791/-	As per record, the advertisement charges relating to Agriculture were cleared by E&SE Department. Para stands till recoupment from Agriculture Department.
	110	Unauthorized expenditure on account of advertisement charges - Rs 13639/-	Department was directed to avoid this practice in future and as per policy, the advertisement notices etc must be routed through Information Department. Displeasure was shown to the Department. However, Para may be settled.
	111	Non deduction of stamp duty @ 1 % - Rs 58735/-	As the clarification by Govt of Khyber Pakhtunkhwa Board of Revenue and Estate department vide No. 9974-10047 dated: 30/4/2012 was produced to audit, therefore recovery of stamp duty should be effected on purchases made as on or after 01.05.2012. Purchases of this period shall be verified within 15 days.
	112	Irregular rush of expenditure under non salary heads of account in June 2011- Rs 40.808 Million	The major portion of the expenditure was inclusive of Petty Repair and Classroom Consumable items which were late released by the Provincial Finance Department. Therefore, Para may be settled.
	113	Unauthorized retention of money in designated bank account - Rs 42.125 million	Para stands till verification.
	114	Irregular transfer of funds to PTC accounts - Rs 37.918 million	Para stands till clarification by the administrative department from the authority concerned regarding audit of PTC funds.
	115	Overpayment on account of pay & allowances - Rs 21,910/-	Recovery started. Para stands till full recovery.
	116	Unauthorized retention and utilization of migration fees -Rs. 110,135/-	Amount recovered vide challan # 02 dated: 12.11.2012, # 04 dated: 10.07.2012, # 02 dated: 04.07.2012. Hence, Para may be settled.
	117	Unauthorized transfer of Petty Repair Funds-Rs249,274/-	It was decided that the fact finding inquiry by District Government Haripur shall be conducted in order to ascertain the overlapping of activity pertaining to Petty Repair in the said Govt Schools i.e whether it was carried out from PTC funds or CESSD funds etc. Para stands till

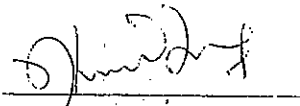
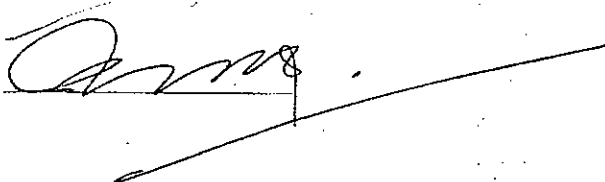
118	Irregular auction of old building material and non collection of income tax Rs.17800/-	Inquiry report. The auction was advertised and approved by the Competent Authority and proper procedure was followed. However, income Tax amounting to Rs. 17800/- was not deducted. Para stand till recovery of Income Tax.
119	Doubtful expenditure of Rs. 2.5 million on account of special repair	Rs.0.956 were released for construction of shed in GGMS Swar Maira and Construction of Boundary wall in GGMS Pharrala. Expenditure statement along with handing / taking over were verified. Therefore, Para may be settled.
120	Unauthorized cutting and auction of trees at GGPS Karlan	Para stands till inquiry by the administrative department.
121	Non auction of old material/furniture	Para stands till auction of unserviceable material and furniture.
122	Non collection of funds from students- Rs.6.058 million	Para stands till verification of record.
123	Non collection of funds and annual registration fee from PPC schools	Collection was made by concerned school on behalf of EDO (RSC) Haripur. Hence, Para may be settled.
124	Non maintenance of inventory record of furniture provided by CESSID	Para stands till verification of stock registers.
125	Excess expenditures due to non compliance of economy measures – Rs 654,46	Amount was released as per actual demand of Department. Economy measures were adopted at the Finance Department level. Therefore, Para may be settled.
126	Unauthorized transfer of budget of Primary & Middle schools to clusters – Rs 602.579 Million	The revised reconciliation of expenditure under Primary & Secondary function with District Accounts Office should be made and it will be shown to audit within one month. Para stands.
127	Irregular expenditure on account of repair of vehicle and POL- Rs.586,750/-	Log books verified. Para may be settled.
128	Unauthorized transfer of money to NGO account-Rs.100,000/-	The amount transferred back to the COWATER International Inc without approval by the Competent Authority. Responsibility should be fixed against the wrong doers. Para stands.

The DAC discussed Advance Para's on two days i.e 27 & 28 November, 2012. The audit appreciated the working of officials of Finance Department regarding timely disposal of DAC matters. The DAC unanimously recommended that the concerned staff may be awarded incentive / honorarium etc to acknowledge their dedicated services.

Executive District Officer
F&P, Haripur

Director Audit
Hazara Region, Abbottabad

District Coordination Officer
Haripur

Page No. 35

Subject: Unauthorized payment of salaries for absent period- Rs.505397

Criteria: Para 23 of GFR Vol-1 states that every controlling officer should realize fully that he will be held personally responsible for loss through fraud or negligence on his own part or any other person subordinate to him.

Condition: Deputy District Officer (F) Primary education Haripur paid Rs.505397 on account of pay & allowances to the staff of GGPS Kanger Amgah during 2010-

S.NO.	Name of Teacher	Amount
1 ✓	Sabira Sadiqa PST	118258
2 ✓	Mussarat Bibi PST	275776
3 ✓	Munir Khan Chow	111363
Total:-		505397

According to the report of ADO Circle the school is closed since long and chowkidar had tied animals in the building. The building was in very miserable condition and gave bhoot bangle look. According to the community, the school is closed since 2004 and ADO was the first officer of education department visited the school since then. PTC funds for the last seven years were misappropriated jointly by Head Teacher and PTC Chair person. Payment of salaries without performing duties resulted in loss to Government.

Recommendation: The matter is reported for investigation fixing responsibility and disciplinary action against person (s) at fault besides immediate recovery of salaries

The then deputy DO (F) and ADO Circle were also visited the school concerned in many time and found the school was open and staff were present in the school, so the para may be dropped please.

محفوظ ڈیٹی DO صدم (Female) Elementary ایجوکیشن عری لورا -

مفتوحہ سیدہ 118258 لور Recovery نئی جاوے -

ضیا عالمہ - گزشتہ سال فروری میں بطور آئی ڈی گورنمنٹ گزٹڈ ایگریکلچرل اسکول لکھنؤ میں ایف اے فراغت
انعام دیا گیا ہے۔ اس سے پہلے ڈی پی پی گنگوڑی گھاٹ میں ایف اے فراغت سے انعام دیا گیا
تھا۔ آرڈر ٹیم کے ساتھ فروری میں ایگریکلچرل اسکول سے سال 2010ء میں سیدہ 118258 لور
Recovery ڈال دی ہے۔ حالانکہ میں اس دوران ڈی پی پی ایگریکلچرل اسکول لکھنؤ میں
جوئی 2010ء سے فروری 2011ء تک کا Period ہے جس میں ایف اے فراغت دیا گیا۔
کلیئرنگ اسکول کا Certificate of Clearance in Cluster درخواست کے ساتھ لف ہے۔
جوئی 2010ء تا جون 2011ء کے دوران ایگریکلچرل اسکول لکھنؤ میں درخواست کے ساتھ منسک
ہیں۔ ایگریکلچرل اسکول، کلرنگ اسکول کو مدنظر رکھتے ہوئے فروری سے Recovery نئی
جاوے۔

ضیا کے عین نواز سے ہوا

Spic

العارضہ: فروری 2011ء میں لکھنؤ ڈی پی پی

ڈی پی پی

ڈی پی پی گنگوڑی گھاٹ عری لورا

حال - ڈی پی پی لکھنؤ تحصیل وینڈیا لکھنؤ

آجورخ 26.09.2012

CERTIFICATE OF CLEARANCE IN CLUSTER

Certified that Mstt: Sabira Saddiqa Bibi D/O Abaidur Rehman PTC teacher was working at GGPS Kangar Aamgah Haripur under the Cluster GHSS Kakotri Haripur. She performed her duty during cluster period i.e. 01-07-2010 to 31-01-2011 regularly, and her salary was drawn and paid to ~~him~~ her.

26/1/2012
Principal,

GHSS Kakotri Haripur

PRINCIPAL
G.H.S.S. Kakotri
Distt: Haripur

24.9.2012

31/12/2010

پست سروس

کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس	کلاس

1	7:30	12:45	B								P	P
2	7:30	12:45	B								P	P
3	7:30	12:45	B								P	P
4	7:30	12:45	B								P	P
5	7:30	12:45	B								P	P
6	7:30	12:45	B								P	P
7	7:30	12:45	B								P	P
8	7:30	12:45	B								P	P
9	7:30	12:45	B								P	P
10	7:30	12:45	B								P	P
11	7:30	12:45	B								P	P
12	7:30	12:45	B								P	P
13	7:30	12:45	B								P	P
14	7:30	12:45	B								P	P
15	7:30	12:45	B								P	P
16	7:30	12:45	B								P	P
17	7:30	12:45	B								P	P
18	7:30	12:45	B								P	P
19	7:30	12:45	B								P	P
20	7:30	12:45	B								P	P
21	7:30	12:45	B								P	P
22	7:30	12:45	B								P	P
23	7:30	12:45	B								P	P
24	7:30	12:45	B								P	P
25	7:30	12:45	B								P	P
26	7:30	12:45	B								P	P
27	7:30	12:45	B								P	P
28	7:30	12:45	B								P	P
29	7:30	12:45	B								P	P
30	7:30	12:45	B								P	P
31	7:30	12:45	B								P	P
32	7:30	12:45	B								P	P
33	7:30	12:45	B								P	P
34	7:30	12:45	B								P	P
35	7:30	12:45	B								P	P
36	7:30	12:45	B								P	P
37	7:30	12:45	B								P	P
38	7:30	12:45	B								P	P
39	7:30	12:45	B								P	P
40	7:30	12:45	B								P	P

پست سروس

پست سروس

Sunday

PST

JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC

2010

پست سروس

پست سروس

پست سروس

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40

JAN FEB MAR APR
MAY JUN JUL AUG
SEP OCT NOV DEC

ایمپوشن حاضری مدرسین گورنمنٹ کالج بھنگالہ
10/10/2010

نام: ماسٹر محمد رفیق
عہدہ: H/T (PST)

روز	وقت	حالت	بیماری	دستخط	بیماری	دستخط	بیماری	دستخط	بیماری	دستخط	بیماری	دستخط
P	8:00	-										
P	12:00	-										
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	12:00	-										
Saturday												
Sunday												
P	8:30	-										
P	1:35	-										
C/Leave												
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	12:00	-										
C/Leave												
P	8:35	-										
P	1:35	-										
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	12:00	-										
C/Leave												
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	1:35	-										
P	8:30	-										
P	12:00	-										

حالت	بیماری	میزان	حالت	بیماری	میزان	حالت	بیماری	میزان	حالت	بیماری	میزان

Head Teacher
G.G.P.S Kengar Angah
District: Mirpur
Date: 10/10/2010

MASTER BOOK CENTER, 16 URDU BAZAR, LAHORE. Ph: 7232205

AN. F. S. MARI APR
MAY JUN JUL AUG
SEP OCT NOV DEC

رہنما حاضری مدرستین گورنمنٹ کالج برائے لڑکیاں
نومبر 2010

نومبر 2010

میزان			حالت			میزان			حالت			میزان			حالت		
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
SUN DAY																	
اقبال 2																	
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
SUN DAY																	
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
تعطیلات عبدالغنی																	
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
SUN DAY																	
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-
P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-	P	-

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

Head Teacher
P.S Kanger Amga
Distt: Haripur

دستخط ہیڈ ماسٹر

MASTER BOOK CENTER, 16 URDU BAZAR, LAHORE. Ph: 7232205

میرزا	سابقہ	حال	میرزا	سابقہ	حال	میرزا	سابقہ	حال	میرزا	سابقہ	حال
Chowkidar											
P	-	P									
P	-	P									
P	-	P									
P	-	P									
	/	/		/	/		/	/		/	/
P	-	P									
P	-	P									
P	-	P									
P	-	P									
P	-	P									
	/	/		/	/		/	/		/	/
P	-	P									
P	-	P									
P	-	P									
P	-	P									
	/	/		/	/		/	/		/	/
P	-	P									
	/	/		/	/		/	/		/	/
P	-	P									
P	-	P									
P	-	P									
P	-	P									
P	-	P									
	/	/		/	/		/	/		/	/
	/	/		/	/		/	/		/	/
	/	/		/	/		/	/		/	/
	/	/		/	/		/	/		/	/

میرزا	سابقہ	حال	میرزا	سابقہ	حال	میرزا	سابقہ	حال	میرزا	سابقہ	حال
									15	14	01

Head Teacher
G.P.S. Kangar Amgar
Distt: Haripur
دستخط ہیڈ ماسٹر
24/12/010

JAN FEB MARCH
MAY JUN JUL AUG
SEP OCT NOV DEC

رجسٹر حاضری مدرسین
فروری 2011ء

روز	وقت	حاضر	غائب	بیمار	موت	تفریح	میل	ہفت روزہ	عہدہ	نام
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						ON DUTY For Meeting	\$ 8:30
P	-	P	-						\$ 12:00	\$ 8:30
/	/	/	/	/	/	/	/	/	بیمار	X
X	X	X	X	X	X	X	X	X	SUN DAY	X
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 12:00	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
X	X	X	X	X	X	X	X	X	SUN DAY	X
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
X	X	X	X	X	X	X	X	X	12/12/12	X
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:45	\$ 8:30
X	X	X	X	X	X	X	X	X	SUN DAY	X
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
P	-	P	-						\$ 12:00	\$ 8:30
P	-	P	-						\$ 1:35	\$ 8:30
/	/	/	/	/	/	/	/	/	SUN DAY	X
P	-	P	-						\$ 12:00	\$ 8:30
/	/	/	/	/	/	/	/	/		

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان
									02	02	-				

Head Teacher
G.C.P.S Kangra
Distt: Haripur
دستخط ہیڈ ماسٹر
38/2/011

JAN FEB MAR APR
MAY JUN JUL AUG
SEP OCT NOV DEC

رجسٹر حاضرین مدارس اور کالجز اور کالجوں کے لیے
2011

صوبہ سرحد
PCT

تاریخ	آر	دستخط	روایتی	دستخط	آر	دستخط	روایتی	دستخط	آر	دستخط	روایتی	دستخط	آر	دستخط	روایتی	دستخط	آر	دستخط	روایتی	دستخط			
	P	-	P	-																	\$ 1:35	\$ 8:30	
	X	X	X	X	SUNDAY								X	X	SUNDAY		X						
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 12:00	\$ 8:30
	P	-	P	-																		C/Leave	
	X	X	X	X	SUNDAY								X	X	SUNDAY		X						
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 12:00	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	X	X	X	X	SUNDAY								X	X	SUNDAY		X						
	P	-	P	-																		C/Leave	
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	P	-	P	-																		\$ 12:00	\$ 8:30
	P	-	P	-																		\$ 1:35	\$ 8:30
	X	X	X	X	SUNDAY								X	X	SUNDAY		X						

نہایت	مال	سابقہ	میزان	مال	سابقہ	میزان	مال	سابقہ	میزان	مال	سابقہ	میزان
	02	-	02									
انفاقہ												
استحقاق												
اقتاری												
میزان												

Head Teacher
P.S. Kangar Amalga
Distt: Haripur

MASTER BOOK CENTER, 16 URDU BAZAR, LAHORE. Ph: 7232205

JAN FEB MAR APR
MAY JUN JUL AUG
SEP OCT NOV DEC

دستخط ہید ماسٹر
مستحقین کو ملازمین کی فہرست
۱۱ مارچ ۲۰۱۱

روز		وقت		ملازمین		ملازمین		ملازمین		ملازمین		ملازمین		ملازمین	
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
SUN DAY		SUN DAY													
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
SUN DAY		SUN DAY													
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
SUN DAY		SUN DAY													
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												
SUN DAY		SUN DAY													
P	-	P	-												
P	-	P	-												
P	-	P	-												
P	-	P	-												

نمبران	مال	مال	مال	مال	مال	مال	مال	مال	مال	مال	مال	مال	مال

99PS لہور دھماکہ (پیر کلاں) ۱۱/۰۴/۲۰۱۱

JAN FEB MAR APR
MAY JUN JUL AUG
SEP OCT NOV DEC

رجسٹر حاضر کی مدرسین اور اساتذہ

اپریل ۲۰۱۱

منتر		مدرسہ		مدرسہ		مدرسہ		مدرسہ		مدرسہ		مدرسہ		مدرسہ		مدرسہ		مدرسہ	
جو کبھی		H.T (PST)																	
X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
P	-	P	-																
P	-	P	-																
X	X	X	X	SUN	DAY	X	X	SUN	DAY	X	X	X	X	X	X	X	X	X	X
P	-	P	-																
X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																
X	X	X	X	SUN	DAY	X	X	SUN	DAY	X	X	X	X	X	X	X	X	X	X
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																
X	X	X	X	SUN	DAY	X	X	SUN	DAY	X	X	X	X	X	X	X	X	X	X
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																
P	-	P	-																

۱۱ ۱۲ ۱۳ ۱۴ ۱۵ ۱۶ ۱۷ ۱۸ ۱۹ ۲۰ ۲۱ ۲۲ ۲۳ ۲۴ ۲۵ ۲۶ ۲۷ ۲۸ ۲۹ ۳۰ ۳۱

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان

Head Teacher
G.G.P.S. Kumbhar Khanda
Distt: Haripur

دستخط ہیڈ ماسٹر

MASTER BOOK CENTER, 16 URDU BAZAR, LAHORE. Ph: 7232205

JAN FEB MAR APR
MAY JUN JUL AUG
SEP OCT NOV DEC

12:30 AM PST
12:30 AM PST
12:30 AM PST

12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM
----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM
12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM
12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM
12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM

12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM	12:30 AM
----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

MASTER BOOK CENTER, 16 URDU BAZAR, LAHORE, PH: 7232205

سید محمد اسحاق
15/01/11
Dist: Haryana
PS Kangra Ramganj
Road 18

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

Service Appeal No. 1575/2013

Nusrat Bibi

VS

Education Deptt:

.....

REJOINDER ON BEHALF OF APPELLANT

.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-5) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Admitted correct by the respondents as the service record of the appellant is in the custody of the concerned department.
- 2 Not specifically denied by the respondents which means that para 2 of the appeal is correct.
- 3 Incorrect. The appellant never remained absent from her duty which is evident from the attendance register and report which are attached as Annexure-A with the appeal.
- 4 Incorrect. The departmental appeal of the appellant was rejected for no grounds.

GROUND:

- A) Incorrect. The action of the department is not lawful and they order dated 14.1.2013 and 14.11.2013 are against the law, facts, material


on record and norms of justice and liable to be set aside.

- B) Incorrect. While para B of the appeal is correct.
- C) Incorrect. The appellant never remained absent from her duty which is evident from the attendance register and report which are attached as Annexure-A with the appeal.
- D) Not replied according to para D of the appeal. Moreover para D of the appeal is correct.
- E) Incorrect. While para E of the appeal is correct.
- F) Incorrect. The whole action of the department is arbitrary and not sustainable in the eyes of law.
- G) Incorrect. The rejection order is not according to law as rejection order is not a speaking order which is violation of Section-24(A) of the General Clauses Act and judgments of the Supreme Court of Pakistan reported as 1991SCMR page-2330.
- H) Incorrect. Hence denied.
- I) Legal.

It is, therefore, most humbly prayed that the appeal of appellant may kindly be accepted as prayed for.

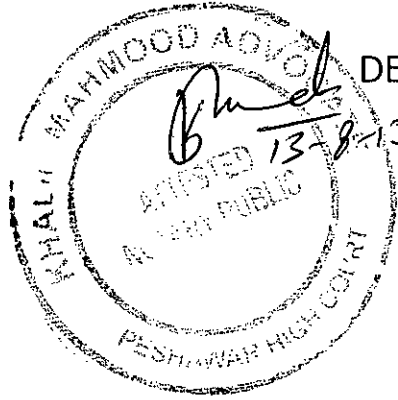
APPELLANT
Nusrat Bibi

Through:


(M. ASIF YOUSAFZAI)
ADVOCATES PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of appeal and rejoinder are true and correct to the best of my knowledge and belief.



Rai
DEPONENT

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

Service Appeal No. 1579/2013

Sabara Siddique

VS

Education Deptt:

.....

REJOINDER ON BEHALF OF APPELLANT

.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-5) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Admitted correct by the respondents as the service record of the appellant is in the custody of the concerned department.
- 2 Incorrect. The appellant never remained absent from her duty which is evident from the attendance register and report which are attached as Annexure-A with the appeal. Therefore the order of recovery is not according to law.
- 3 admitted correct by the respondents that recovery order dated 14.1.2013 has been passed for the reasons of so-called absence of the appellant, but the appellant never remained absent from her duty which is evident from the attendance register and report which are attached as Annexure-A with the appeal.

- 4 Admitted correct by the respondents that the departmental appeal was rejected but without any reason.
- 5 Incorrect. The appellant has good cause of action to file the instant appeal.

GROUND:

- A) Incorrect. The action of the department is not lawful and they order dated 14.1.2013 and 14.11.2013 are against the law, facts, material on record and norms of justice and liable to be set aside.
- B) Incorrect. While para B of the appeal is correct.
- C) Incorrect. The appellant never remained absent from her duty which is evident from the attendance register and report which are attached as Annexure-A with the appeal.
- D) Not replied according to para D of the appeal. Moreover para D of the appeal is correct.
- E) Incorrect. While para E of the appeal is correct.
- F) Not replied according to para F of the appeal moreover para F of the appeal is correct.
- G) Not replied according to para G of the appeal moreover para G of the appeal is correct.
- H) Not replied according to para H of the appeal moreover para H of the appeal is correct.
- I) Legal.

It is, therefore, most humbly prayed that the appeal of appellant may kindly be accepted as prayed for.

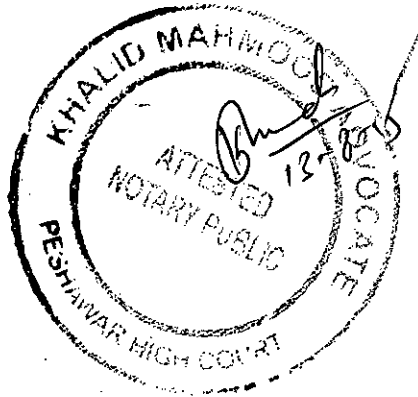
APPELLANT
Sabra Siddique

Through:


(M. ASIF YOUSAFZAI)
ADVOCATES PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of appeal and rejoinder are true and correct to the best of my knowledge and belief.




DEPONENT