

24.07.2015

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

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

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

Appellant Deposited
Security & Process Fee



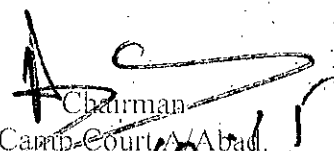

Chairman
Camp Court A/Abad

20.10.2015

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

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

Dismissed as withdrawn.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




Chairman
Camp Court A/Abad.
20.10.15

ANNOUNCED
20.10.2015

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 768/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08.07.2015	<p>The appeal of Mst. Asma Noreen presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 768/2015

Asma Noreen d/o Nawab Khan GGPS, Bamble Chathar Plan R/o
Tanda U/C Dhodial Tehsil & District Mansehra

.....Appellant

VERSUS

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

.....Respondents

INEX

S.No	Prescription of Document	Annexure	page
1	APPEAL		1-10
2	Copy of Advertisement	"A"	"
3	Copies of Documents/testimonial are annexed	"B"	12-29
4	Copy of appointment order and corrigendum	"C"	30-33
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	34-35
6	Copy of impugned dismissal order of appellant	"E"	36
7	Copy of departmental appeal /representation	"F"	37-39
8	Wakalatnama		

Dated: 7/7/2015

Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

①

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 768/2015

K.W.F. Province
Service Tribunal
Diary No. 807
Dated 8/7/2015

Asma Noreen d/o Nawab Khan GGPS, Bamble Chathar Plan R/o
Tanda U/C Dhodial Tehsil & District Mansehra

.....Appellant

VERSUS

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

.....Respondents

SERVICE APPEAL.

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

Respectfully Sheweth,

Filed to day
Asma Noreen
8/7/15.

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"

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 (General Order No 59 U/C Dhodial to U/C Tanda). **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 2116-25/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

3

was found attached with the show cause notice, wherein it was mentioned against the name of appellant that "that appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes as against the recruitment rules". **Copy of Show cause notice annexed as Annexure "D"**. AS the inquiry committee did not recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of PST Teacher and appeared in ETTA of the merits list and thereafter was appointed on merit. Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their requisite qualification from recognized Institution to be appointed "as per service structure in prescribe rules the requisite qualification against the vacant post of PST Teacher is taken into consideration and thereafter appointment made on merit.
8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service,

4

dismissed the appellant vide impugned dismissal order endst. No 2116-25/AE /ESTB dated 03.03.2015. **Copy of impugned dismissal order of appellant is attached as annexure "E".**

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 11.3.2015. **Copy of departmental appeal /representation is attached as annexure "F"** but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

GROUND

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

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

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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 2116-25/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: -----/2015


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

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BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Asma Noreen d/o Nawab Khan GGPS, Bamble Chathar Plan R/o
Tanda U/C Dhodial Tehsil & District Mansehra

.....Appellant

VERSUS

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

.....Respondents

APPLICATION FOR SUSPENSION
OF IMPUGNED ORDER NO 2116-
25/AE /ESTB AND GRANT OF
STATUS QUO TILL FINAL DISPOSAL
OF THE MAIN APPEAL .

Respectfully Sheweth,

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

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


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

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

Dated: 27/1/2015


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

10

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Asma Noreen d/o Nawab Khan GGPS, Bamble Chathar Plan R/o
Tanda U/C Dhodial Tehsil & District Mansehra

.....Appellant

VERSUS


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

.....Respondents

AFFIDAVIT

I, Asma Noreen d/o Nawab Khan GGPS, Bamble Chathar Plan R/o
Tanda U/C Dhodial Tehsil & District Mansehra do hereby
solemnly affirm and declare that the contents of foregoing
service appeal are true and correct to the best of my knowledge
and belief and nothing has been concealed from this Honourable
Court.

Dated: 7/7/2015


Deponent

Annex B

BOARD OF INTERMEDIATE & SECONDARY EDUCATION, ABBOTTABAD

S. No. 02394

DETAILED MARKS CERTIFICATE -
Secondary School Certificate Examination
(SCIENCE GROUP)

P-12

Session 19 94 (Annual/Supplementary)

Name Asma Naureen

Father's Name Nawab Khan Roll No. 2554

SUBJECT	Total Number of marks allotted	MARKS OBTAINED	
		In figure	In words
1. English	150	69	
2. Urdu	150	104	
3. Islamiyat	75	62	
4. Pakistan Studies	75	50	
5. Gen. Mathematics/ (Elec)	100	34	
6. Physics	100	45	
7. Chemistry	100	60	
8. Biology	100	57	
Total	850	481-C	Four hundred and eighty one - C

Note: Errors/omissions accepted
F: Failed in the paper (s)

Prepared by: [Signature]

Checked by: [Signature]

Date 19

Controller of Examinations
Board of Intermediate & Secondary Education
Abbottabad

[Signature]
Zia-ul-Hassan
S.S.T (General)
G.H.S Shinklari
(Miansehra)

[Signature]
Advocate
Distt: Courts Abbottabad

P-13

ADA No. 050065

Roll No. 2554

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Abbottabad N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION ANNUAL 1994

THIS IS TO CERTIFY THAT ASMA NOREEN

Son/Daughter of NAWAB KHAN.

and a student of GOVT: GIRLS HIGH SCHOOL DHODIAL MANSEHRA.

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in April 1994.

as a *Regular/Private candidate*. He/She obtained 481 Marks out of 850 and has been placed in Grade c Representing GOOD.

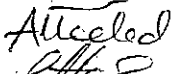
The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|---------------|-------------|
| 1. English | 3. Islamiyat | 5. E.MATH | 7. PHYSICS. |
| 2. Urdu | 4. Pakistan Studies | 6. CHEMISTRY. | 8. BIOLOGY. |


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

Date of birth according to admission form is THIRD JULY,
one thousand nine hundred and SEVENTY SEVEN (03-07-1977)


Asst. Secretary


S. S. Iqbal
Shinkari
(Mansehra)
This certificate is issued without alteration of erasure.


Secretary



Chairman
Chief Officer

P-14

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Certificate No: 206047881

Roll No: 47881

Group: HUMANITIES

DETAILED MARKS CERTIFICATE
HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

Part - II
Session: 2006 (Annual)

Name: ASMA NOUREEN
Father Name: NAWAB KHAN
Institution/
District: MANSEHRA

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					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	33	--	59	--	92	Ninety-Two
Urdu (Comp)	200	72	--	61	--	133	One Hundred Thirty-Three
Islamic Education	50	39	--	--	--	39	Thirty-Nine
Pakistan Studies	50	--	--	37	--	37	Thirty-Seven
Islamic History	200	62	--	61	--	123	One Hundred Twenty-Three
Islamic Studies	200	74	--	75	--	149	One Hundred Forty-Nine
Urdu (Advance)	200	68	--	60	--	128	One Hundred Twenty-Eight

Total : 1100

701-B Seven Hundred One Only

Remarks :

Date : 05-August, 2006

Checked By :

Attested
Zia ul Hassan
S.S.T (General)
G.H.S Shinkriari
(Mansehra)

[Signature]
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.biseatd.edu.pk


Attested -
[Signature]
Muhamm
District Courts Abbottabad
Advocate

ADA

No. 062380

Roll No. 47881

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2006

Humanities Group

This is to certify that ASMA NAUREEN

Daughter of NAWAB KHAN

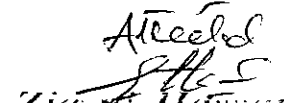
A candidate from MANSEHRA DISTRICT

has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 2006 as a Private Candidate. She has obtained 701 marks out of 1100 and has been placed in Grade B Representing VERY GOOD.

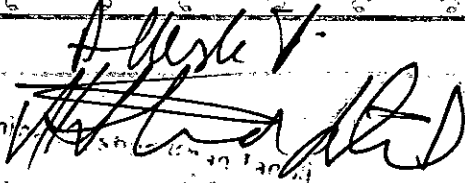
The Examination was taken as a Whole/In Parts and the candidate passed in the following subjects:

- | | | |
|-------------------|-------------------|-----------------------|
| 1.ENGLISH | 2.URDU | 3.ISL.EDU-PAK STUDIES |
| 4.ISLAMIC HISTORY | 5.ISLAMIC STUDIES | 6.URDU (ADVANCE) |


Asstt. Secretary


S.S.T (General)
This certificate is issued without alteration or erasure.
(Mansehra)


Secretary


Muhamm...
...
...



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 21436

DETAILED MARKS CERTIFICATE

BA ANNUAL 2008

Roll No: 62815

Registration No: 0201MAFPX-BA7

Student's Name: Asma Noreen

Father's Name: Nawab Khan

Institution/District: Mansehra

Part: Second

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. Part I Marks	285	76	One Hundred & Seventy-Six	Pass
2. English Compulsory	75	25	Twenty-Five	Pass
3. Pakistan Studies	40	30	Thirty	Pass
4. Islamic Studies	75	36	Thirty-Six	Pass
5. Urdu	75	46	Forty-Six	Pass

Total 550
 Percent 76
 Division Second



Checked by: _____

Controller Examinations
 Hazara University, Mansehra
 August 20, 2008

Errors and omissions are subject to subsequent rectification.
 Any mistake in Name, Father Name etc must be intimated
 within 60 days of the issuance date of this certificate.

Attested

M. A. Rashid
 District Controller
 District Courts, Mansehra

Serial No. 002230

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

P-17

Registration No. 0201MAFPX-BA7

Roll No. 62815

HAZARA UNIVERSITY

Mansehra, Pakistan

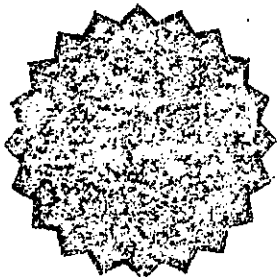


Attested
Muhammad Arif
Muhammad Arif
Distt. Court, Mansehra

The University in recognition of the fulfilment of prescribed requirements has conferred upon
Mr / Ms Asma Noreen Son / Daughter of Nawab Khan

The Degree of **BACHELOR OF ARTS** in the examination
held in June, 2008 session Annual 2008

He / She was placed in Second Division / Grade / CGPA.
The examination was taken as a whole.



[Signature]
Controller of Examinations

Date 20-8-2008

Attested
[Signature]
S S I (General)
G. H. S Shinkari
(Mansehra)
Vice Chancellor

[Signature]
Registrar



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 2197

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL) ANNUAL EXAMINATION 2010

Roll No: 26833

Reg No: 0201MAFPX-BA7

Name: Asm. Noorah

F/ Name: Nawab Khan

Institution/ District: MANSEHRA

Subject: Islamiat

COURSE TITLE:	Max. Marks		Marks Obt:		Total	Mark: in Words	Remarks
	TH	FR	TE	PR			
MA Previous Marks	500				323	THREE HUNDRED TWENTY-THREE	
(Al-Qura'an) Translation 2nd Half & Commentary alongwith Grammar	100		62		62	SIXTY-TWO	Pass
Principles of Islamic Jurisprudence	100		61		61	SIXTY-ONE	Pass
Islam & other World Religions	100		65		65	SIXTY-FIVE	Pass
Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100		55		55	FIFTY-FIVE	Pass
Islamic Economics / Islamic Politics / Islam & Science	100		62		62	SIXTY-TWO	Pass
General Viva Voce	100		75		75	SEVENTY-FIVE	Pass
Total:	1100				703	SEVEN HUNDRED THREE	
Percentage:	63.91						
Division:	FIRST						

Print Date: 25-11-2010

Checked By: *[Signature]*

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Riaz Hussain
Associate Professor

[Signature]
Controller Examinations
Hazara University, Mansehra
November 25, 2010

[Signature]

[Signature]

Asst. Controller Examinations

Serial No. 003490

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 0201MAFPX-BA7

Roll No. 26833

HAZARA UNIVERSITY

Mansehra, Pakistan



P-19

Ms. Courts Abbodare

Asma Noreen

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

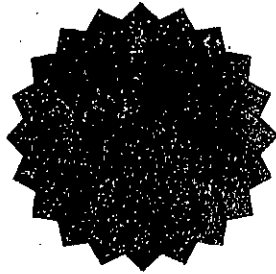
Mr / Ms Asma Noreen Son / Daughter of Nawab Khan

The Degree of **MASTER OF ARTS** in Islamiyat

in the examination field in August, 2010 session Annual 2010 (Private)

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

The examination was taken as a Whole.



[Signature]
Controller of Examinations

Date 25-Nov-2010

[Signature]
Vice Chancellor

[Signature]
Registrar

Serial No. 129931

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Name ASIMA NOREEN
Father's Name NAWAB KHAN
Address D/O NAWAB KHAN VILL AND P/O
DHODIAL
Tehsil MANSEHRA
District MANSEHRA

Roll No Q601167
Registration No Q4NMA1326
Final Semester AUT- 2006

P-20

has successfully completed PRIMARY TEACHING CERTIFICATE Programme.

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 04	0613	PRINCIPLES OF EDUCATION	100	56
AUT- 04	0614	EDUCATIONAL PSYCHOLOGY	100	59
AUT- 04	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	74
AUT- 04	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	64
EPR- 05	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	87
AUT- 05	0617	TEACHING OF URDU	100	68
AUT- 05	0618	TEACHING OF MATHEMATICS	100	68
AUT- 05	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	68
AUT- 05	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	50

CREDITS: 5

Total Marks / Obtained 900 594

Result Declared on JUNE 20, 2006

Date of issue JULY 05, 2006

Disclaimer:

This result card is issued provisionally, errors and omissions excepted. It is for information 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
Sumera

SUMAIRA IQBAL
Officer (Staff) (SPS 17) Ghiss
Qhar Habibulla, Mansehra

Controller of Examinations

Muhammed Iqbal
Distt: Centre, Islamabad

Allama Iqbal Open University Islamabad

Serial No 180409



P-21

Certified that *Mr/Ms* ASMA NOREEN
Son/Daughter of NAWAB KHAN
Registration No 04 NMA 1326 *Roll No* Q 601167
Semester AUTUMN 2005 *having met all the requirements*
under the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured 66 % *marks*
and has been placed in B *grade*

Received
Quai
Riaz Hussain
Associate Professor
GDC Balakot



Muhammad Ali
Distt. Controller, Islamabad

Result declared on: June 20, 2006

Date of issue: January 16, 2008

[Signature]
Controller of Examinations

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
613	Principles of Education p. 22	56
614	Educational Psychology	59
615	School Organization & Management	74
616	School Community & Practical Arts	64
617	Teaching of Urdu	68
618	Teaching of Mathematics	68
619	Teaching of Science & Physical Education	68
620	Teaching of Islamiat & Social Studies	50
611	Practical Workshop & Teaching Practice	87

Total credit hours **XXX**

Obtained / Total marks **594 / 900**

Total credits AIUO **5**

Cumulative grade point average **XXX**

First semester: **AUTUMN 2004**

Final semester **AUTUMN 2005**

Grading Scheme

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


Controller of Examinations

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Serial No. 333820

Name ASIMA NOREEN
 Father's Name NAWAB KHAN
 Address VICKY MEDICAL STORE MOHALLAH
 MALKAL POST OFFICE AND VILLAGE
 Tehsil MANSEHRA
 District MANSEHRA

Roll No. AE622471
 Registration No. 04NMA1326
 Final Semester AUT- 2010

has successfully completed BACHELOR OF EDUCATION (B. ED)

P-23

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 09	0514	EVALUATION, GUIDANCE & RESEARCH	100	63
AUT- 09	0651	ENGLISH (COMPULSORY	100	60
AUT- 09	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	61
AUT- 09	0513	SCHOOL ORGANIZATION	100	65
SPR- 10	0658	TEACHING OF URDU	100	71
SPR- 10	0654	TEACHING OF ISLAMIAT	100	69
AUT- 10	0655	WORKSHOP & TEACHING PRACTICE	100	82
AUT- 10	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	59
AUT- 10	0512	PERSPECTIVES OF EDUCATION	100	65



Attested
[Signature]

Received
[Signature]
Riaz Hussain
 Associate Professor

Controller of Examinations

CREDITS: 6
 Result Declared on JULY 18, 2011
 Date of issue JULY 29, 2011

Total Marks / Obtained 900 / 595
 Percentage / Grade 66 B

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.

Allama Iqbal Open University Islamabad



P-24

184393

Serial No. _____

Certified that Mr. / Ms. ASMA NOREEN

Son / Daughter of NAWAB KHAN

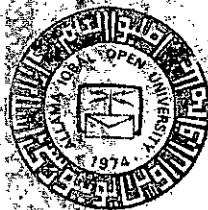
Registration No: 04NMA1326 Roll No: AE622471

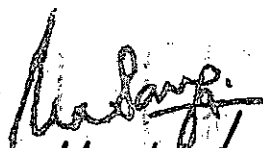
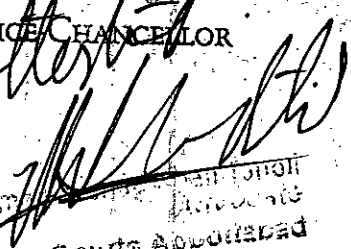
having successfully completed the prescribed requirements
in semester AUTUMN 2010 is awarded the degree of

Bachelor of Education (B.Ed)

He/She has secured 66 % marks and has been placed in B grade.


CONTROLLER OF EXAMINATIONS




VICE-CHANCELLOR

Muhammad
Distt: Courts Islamabad

Result declared on: July 18, 2011

Date of Issue: September 03, 2013

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 150291

PROVISIONAL RESULT CARD

Name ASINA NOREEN

Roll No. 150291

Father's Name NALAN KHAN

Registration No. 150291

Address VICKY MEDICAL STORE MOHALLAH NALMAL POST OFFICE AND VILLAGE CHODIAL

Final Semester AUT- 2018

Tehsil MANSEHRA

District MANSEHRA

has successfully completed CERTIFICATE OF TEACHING

P-25

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 18	0632	TEACHING STRATEGIES & EVALUATION	100	59
SPR- 18	0633	SCHOOL ORGANIZATION	100	69
SPR- 18	0632	EDUCATIONAL PSYCHOLOGY	100	65
SPR- 18	0631	DIMENSIONS IN EDUCATION	100	66
AUT- 18	0634	ENGLISH AND ITS TEACHING	100	52
AUT- 18	0619	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	81
AUT- 18	0625	SOCIAL STUDIES & ITS TEACHING	100	55
AUT- 18	0625	ISLAMIAT AND ITS TEACHING	100	63
AUT- 18	0604	URDU LANGUAGE AND ITS TEACHING	100	66

CREDITS: 5

Total Marks / Obtained

900 / 598

Result Declared on JULY 13, 2018

Percentage / Grade

65 B

Date of issue AUGUST 27, 2018

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 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.

Alama Iqbal Open University
Islamabad



P-28

Serial No. 116121

Certified that *Mr/Ms* ASMA NAUREEN

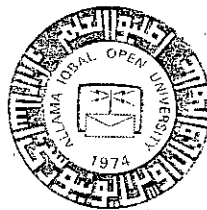
Son/Daughter of NAWAB KHAN

Registration No 04-NMA-1326 *Roll No* AT651165

Semester AUTUMN 2013 *having met all the requirements under*
the semester system is this day awarded the

Certificate of Teaching

He/She has secured 65 % *marks*
and placed in B *grade*



03 July, 2014

Result declared on:

23 April, 2015

Date of issue:

Controller of Examinations

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

Muhammad Ashraf Khan Tanoli
Associate
Distt. Courts Abbottabad

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
631	DIMENSIONS IN EDUCATION	66
632	EDUCATIONAL PSYCHOLOGY	65
633	SCHOOL ORGANIZATION	69
634	ENGLISH AND ITS TEACHING	52
638	TEACHING STRATEGIES & EVALUATION	58
612	PRACTICAL WORKSHOP & TEACHING PRACTICE	81
604	URDU LANGUAGE AND ITS TEACHING	66
605	SOCIAL STUDIES & ITS TEACHING	68
635	ISLAMIAT AND ITS TEACHING	63

P-27

XXX

588/900

Total credit hours

Obtained / Total marks

5

XXX

Total credits AIU

Cumulative grade point average

SPRING 2013

AUTUMN 2013

First semester:

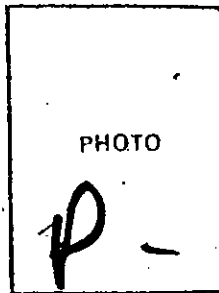
Final semester

Grading Scheme

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

Muhammad
Controller of Examinations

DOMICILE CERTIFICATE



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

I was born at DHODIAL Tehsil MANSEHRA

District MANSEHRA

I passed Primary Education from GOVT: GIRLS PRIMARY School NO. 1 DHODIAL

Resident of VILLAGE DHODIAL,

Tehsil MANSEHRA

District MANSEHRA

Sd/- Asma Noreen Dated 14-06-1997

Pursuance to the declarat on dated _____

Filed by ASMA NOREEN X/o D/O NAYAB KHAN

Tribes SWATI Section SAR KHELY Sub Section XX

DHODIAL Tehsil MANSEHRA District MANSEHRA

To the effect that he had been born of parents who are permanently domiciled in N.W.F. Province having been born within to.

VERIFICATION OVERLEAF

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

Given under my had and the seal of Court this _____

26th day of June 1997

MAGISTRATE 1ST CLASS

3461 Dated 26/6/97

COUNTERSIGNED

Countersigned

DISTRICT MAGISTRATE

Attested

[Handwritten signature]

[Handwritten signature]

Ost. C. _____

تصدیق پیمانی ہے کہ عامہ نورین ولد نواب خان قوم سحرہ علی نے اپنی بیوی سے
 گورنمنٹ ٹرنز پیئر انٹری سکول تک ڈیوٹی مال سے حاصل کی - رجسٹر نمبر داخلہ - 3758 -

Fazilat nisa ۲۱۶

تقدیر کی گنجائی ہے کہ عامہ نورین ولد نواب خان قوم سحرہ علی نے
 کو میں زاتی طور پر جائیدادوں سے بیان تحریر کرنا ہوں
 کہ آباد آباد سے ڈیوٹی مال و غیرہ سے حاصل کی گئی ہے

Qalandar Khan Numbered
 Abudul Kalam

درخواست

فی الحال
 لکڑی تندر خان نمبر درویشہ علیہم لکڑی تندر خان قوم سحرہ علی نے اپنی بیوی سے
 جس میں لکڑی تندر خان نمبر درویشہ علیہم لکڑی تندر خان قوم سحرہ علی نے اپنی بیوی سے

۲۳/۶

۲۳/۶
 ۹۷

~~23/6~~
 25/6

Signature
 -
 Signature

- cell - 0340 9106705 -

Annex 2

P-30

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

Consequent upon the recommendation of the Departmental Selection Committee District Mansehra, the competent authority is pleased to appoint the following candidates as a Primary School Teacher PST (Female) against newly created / resultant vacated posts in their relevant union councils in BPS 7 @ Rs.5800-320-15400 plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect.

U/C BAFFA				
S#	Name of Candidate	Father's Name	Home Address/ Domiciled U/C	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	Own UC M/List
2	Sabia	Noor Hussain	Baffa	Own UC M/List
U/C BEHALI				
3	Munaza Daud	Daud	Behali	Own UC M/List
4	Nazma Bibi	R.Khan Bahdar	Behali	Own UC M/List
U/C Battal				
5	Shagufa Bibi	Muhammad Shafi Khan	Battal	Own UC M/List
6	Shaista Jabeen	Muhammad Akbar	Kathai	From Adjacent UCs Merit list
U/C Bherkund				
7	Bushra	Ghulam Mustafa	Bhekund	Own UC M/List
U/C Gari Habib Ullah				
8	Naida Ashraf	Muhammad Ashrif Bag	Gari Habib Ullah	Own UC M/List
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	Own UC M/List
U/C Hilkot				
10	Bibi Asia	Abdul Ghafoor	Hilkot	Own UC M/List
U/C Hangrai				
11	Irum Saeed	Saeed Akhtar	Hangrai	Own UC M/List
12	Marium Bibi	Muhammad Younis	Hangrai	Own UC M/List
U/C Ichrian				
13	Bibi Sajida	Saeed ur Rehman	Ichrian	Own UC M/List
14	Saima Ara	M.Fareed Khan	Ichrian	Own UC M/List
U/C Jabar Daveli				
15	Mah Jabeen	Muhammad Farooq	Jabar Daveli	Own UC M/List
16	Saba Tariq	Muhammad Tariq	Sachan	From Adjacent UCs Merit list
U/C Jaloo				
17	Sobia Bibi	Abdul Ghafoor	Jaloo	Own UC M/List
18	Saima Naz	Mir Afzal	Jaloo	Own UC M/List
U/C Karnol				
19	Fara Naz	Muhammad Khurshid	Karnol	Own UC M/List
20	Nadia Rehman	Habib ur Rehman	Pairan	From Adjacent UCs Merit list
U/C Karori				
21	Amrin Younis	Muhammad Younis	Karori	Own UC M/List
22	Musrat Bibi	Khalil ur Rehman	Karori	Own UC M/List
23	Zenab	Alam Zeb	Karori	Own UC M/List
24	Amrin Kusar	Muhammad Miskeer	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

Received at
Date

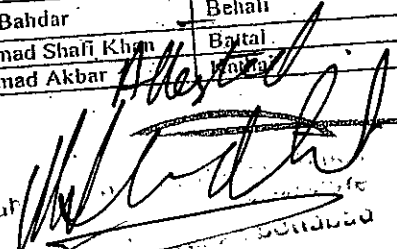
Attested
Muhammad Ahsan Tariq
Advocate
Distt: Courts Abbottabad

U/C Lissan Nawab				Own UC M/List
29	Sobia Arshad	Muhammad Arshad	Lissan Nawab	Own UC M/List
30	Rashida Bibi	M.Zahoor	Lissan Nawab	Own UC M/List
U/C Mohandari				Own UC M/List
31	Bibi Naseema	Ghulam Nabi	Mohandari	Own UC M/List
U/C Nika Pani				Own UC M/List
32	Yasmeen Wahab	Abdul Wahab	Nika Pani	From Adjacent UCs Merit list
33	Neelam	Abdul Latif	Darband	From Adjacent UCs Merit list
U/C Perhinna				Own UC M/List
34	Lubna Younis	M.Younis	Perhinna	Own UC M/List
35	Zahida Bano	Ali Zaman	Perhinna	Own UC M/List
U/C Phulra				Own UC M/List
36	Bibi Saleha	Abdula Jan	Phulra	Own UC M/List
37	Mehnaz Bibi	M.Iqbal	Phulra	Own UC M/List
38	Bibi Mewash	M.Naveed	Phulra	Own UC M/List
39	Farzana Yousaf	M.Yousaf	Phulra	Own UC M/List
40	Bibi Farah	Khurshid Khan	Sawan Maira	From Adjacent UCs Merit list
U/C Sachan Kalan				Own UC M/List
41	Bibi Salama	Shezada Khesro Fareedon	Sachan Kalan	Own UC M/List
42	Bibi Norin	Rehmat Ullah	Sachan Kalan	Own UC M/List
U/C Sawan Maira				Own UC M/List
43	Tahira Jabeen	Muhammad Ayub	Sawan Maira	Own UC M/List
U/C Shanaya				Own UC M/List
44	Safoora Farat	Abdul Razaq	Shanaya	Own UC M/List
45	Irum Shaheen	Anwar Khan	Shanaya	Own UC M/List
U/C Shergarh				Own UC M/List
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	From Adjacent UCs Merit list
49	Asma	Abdul Malik	Darband	From Adjacent UCs Merit list
U/C Shuakat Abad				Own UC M/List
50	Sadia Javed	Javed Khan	Shuakat Abad	Own UC M/List
51	Sabeen	M.Haroon	Shuakat Abad	Own UC M/List
52	Tabasam Rashid	Abdul Rashid	Shuakat Abad	Own UC M/List
U/C Trangri Sabir Shah				Own UC M/List
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				From Adjacent UCs Merit list
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				From Adjacent UCs Merit list
58	Sahibzada Hazmat Rabani	Ghulam Rabani	Tanda	From Adjacent UCs Merit list
59	Asma Noreen	Nawab Khan	Dhodial	From Adjacent UCs Merit list

ADJUSTMENT ORDER

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

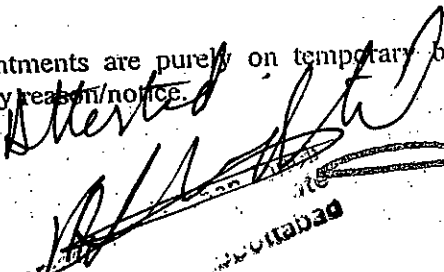
S#	Name	Father's Name	Home Address/ Domiciled U/C	Place of Posting	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	GGPS Baffa-Khurd	A/V/Post
2	Sabia	Noor Hussain	Baffa	GGPS Kando Gali	A/V/Post
3	Munaza Daud	Daud	Behali	GGPS Ashwal	A/V/Post
4	Nazma Bibi	R.Khan Bahdar	Behali	GGPS Jamal Nakka	A/V/Post
5	Shagufta Bibi	Muhammad Shafi Khan	Batal	GGPS Karmang	A/V/Post
6	Shaista Jabeen	Muhammad Akbar	Batal	GGPS Chandni	A/V/Post

Muhammad Akbar

 - 2 -

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

TERMS & CONDITIONS:

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

Attested

 Muhammad
 Dist. Officer, District Office, Dera Ismail Khan

P-33

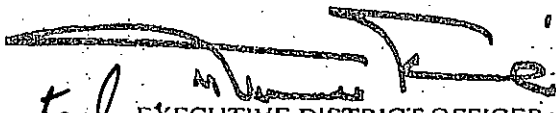
- They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature-ship will be stand automatically cancelled.
 4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
 5. They will submit to this office, their all testimonial and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
 6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Mansehra)
 7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
 8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice, their one month pay/allowances if any shall be forfeited to Government Treasury.
 9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
 10. They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
 11. They may not be handed over the charge if their age is above 35 years and below 18 years.
 12. The Candidates who are working as regular before 1st July 2001 in pervious post, their entitled for pension / gratuity etc.
 13. No. TA/DA etc is allowed.
 14. Charge report should be submitted to all concerned in duplicate.

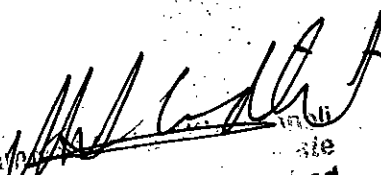
(Umar Khan Kundi)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No. 5360-5384 /Estt: (F)Apptt:PET(F)/2011-12 Dated Mansehra thc 18th May, 2012

Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
6. Deputy District Officer (Female) E&SE Manshra.
7. PA to District Coordination Officer, Mansehra.
8. Budget & Accounts Officer, local office, Mansehra.
- 9-67. Candidates concerned.

Attested

EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA


Muhammad Aslam
Distt. Courts Abbottabad



Annex E,

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7781 - / S. Cause
Dated the 28/9/ /2014

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

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SHOW CAUSE NOTICE

I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Asma Noureen, PST GGPS Kothri Mansehra Show cause Notice as follows:

1) You were illegally appointed as PST at GGPS Kothri; vide defunct Executive District Officer (E&SE) Mansehra, at S. No. 59 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 well& wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.

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

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

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

Attended

[Signature]

[Signature]
COMPETENT AUTHORITY

Mst. Asma Noureen

GGPS Kothri

To,

The District Education Officer,

(Female) Mansehra.

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Subject SHOW CAUSE NOTICE


Memo Reference to your No 7775 dated 29/09/2014.

In reference to the showcase served upon me vide your No quoted under reference

The para wise reply is as under

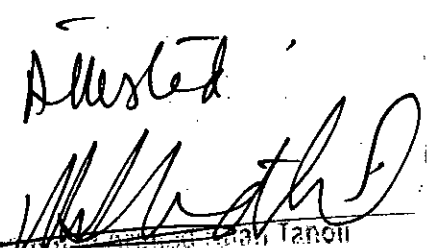
1. It is most humbly mentioned that after perusal of charges leveled against me I wondered About the matter baseless my appointment was made after the proper advertisement, test, Interview, conduct by the ETEA authority purely on merit basis by then EDO (E&S) Education in the General appointment order S.No 59 without any appeal etc. I never conducted to the officer/authority for the purpose.
2. (a). As stated in Para No 1 above this is baseless.
(b). I am getting salary after proper working duty on the bases of my appointment made on merit as mention in Para No 1 above.
(c). As detail mentioned in the Para No 1 my appointment was made purely on merit for which I was also deserved under the establishment rights.
3. I am existing at S.No _____ of the open merit obtaining 57.11 percent marks.

In the light of facts mentioned above, it is most humbly prayed that, I may very kindly be exonerated from the charges leveled against me. And I will remain very thankful to you for this act of kindness please.


Yours obediently

Asma Noreen PST

GGPS Kothri


Munir Ahmad Tanoli
Advocate
Distt: Courts Abbottabad



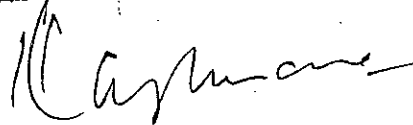
Annex 'E'

P-36

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

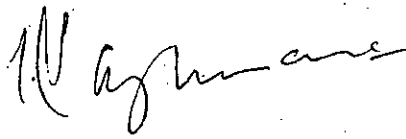
- 1:- Where as Mst: Asma Noreen D/O Nawab Khan working as PST GGHS/GGMS/GGP Kohri was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the 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. Asma Noreen D/O Nawab Khan GT/PET/AT PST GGHS/GGM GGPS Kohri

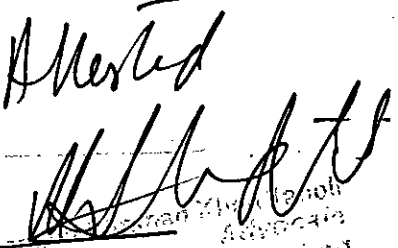

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 2116-25/AE- /Etab: dated 03/03/2015.

Copy to the:-

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


DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Attested

Distt. Courts Mansehra

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa Peshawar.

Annex

F

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Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDORSEMENT NO.2116-25 DATED 3RD MARCH 2015 WHEREBY MAJOR PENALTY OF DISMISSAL FROM GOVERNMENT SERVICE WAS IMPOSED UPON THE APPELLANT IN A HIGH CAPRICIOUS/WHIMSICAL MANNER WITHOUT LAWFUL AUTHORITY (COPY OF THE IMPUGNED NOTIFICATION IS ATTACHED)

*e
ad*

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

Respected sir:-

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

1. That the then Executive District Officer, E&SE Mansehra invited applications for recruitment of teachers of various cadres in District Mansehra through advertisement published in daily MASHRAQ.
2. That as per procedure appellant applied for the post of PST being a qualified teacher having PTC Certificate with MA & B-Ed, PTC, CT Trained and ETA Test was conducted on 26/02/2011 and appellant appeared as a candidate and obtained 185 marks out of 300.
3. That the then ED^o conducted interview and scrutinized the documents of the candidates and merit list of the candidate was displayed for receiving objections. After due official process the meeting of DSC was held and approved the cases of PST candidates for appointment against the vacant posts of PST.

Attest

Muhammad Arshad Khan Tanoli
Advocate
Dist: Courts Abbottabad

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4. That appointment order of the appellant was issued under endorsement No.5360-5384/Estt: Apptt: PET (F) 2011-12 dated 18/05/2012 and appellant was posted at GGPS Kothri and after 2 month I am transferred from GGPS Kothri to GGPS Bimbal Circle Battal (Copy attached).
5. That appellant continuously performing her duty without any break for more than 02 years 9 months and 15 days while a show cause notice whereby allegations were leveled against the appellant based on concoction, baseless & concealment of facts:
6. No show-cause were issued to most of the teachers, the DEO have signed the show-cause and kept in file so that she can argue that no reply was made by the teacher for which she have dismissed. Whereas the appellant have replied properly (Copy attached)
7. The appellant was appointed after due recruitment process and her appointment order along-with others candidates was issued in a lot after the approval of DSC.
8. That appellant received impugned order dated 3rd March 2015, whereas the major penalty of dismissal from service has been imposed upon the appellant. (copy of the dismissal is attached)
9. That the appellant passed here professional qualification i.e , PST Course with MA B-Ed. All the degrees and certificates were also get verified from the concerned University / Board / Institutions by the District Officer (Female) Copy attached. Photo copy of the Service Book is also attached.
10. It is requested that my appointment was by the then Executive District Officer E&SE Mansehra after observing all the codal formalities and according to the rules and regulation, my dismissal order in the light of charges leveled against me are strictly baseless and concoction.

Sir,

- a) Appellant was appointed after due process of recruitment through ETA test and her appointment order was issued after the approval of DSC. The appellant served as regular teacher in Education Department for more than 2 years 9 months and 15 days and no action was taken nor show-cause was served

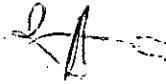
Attested
Muhammad Anwar Khan
Muhammad Anwar Khan
District Court Adenabad

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neither asked for any irregularities or personal hearing during the Probation period.

- b) No inquiry was conducted or initiated, no opportunity of defense was offered, no personal hearing was made, how the authority was passed in the light of E&D rules under what charges/ evidence imposed such a harsh punishment.
- c) The inquiry regarding illegal appointment was made against the then EDO not against the candidates/teachers.
- d) The enquiry was made and in the finding no recommendation was issue for the termination/dismissal of teachers, they only recommended the appointing authority for minor punishment as one step down or 2 deductions of 2 increments.
- e) The District Education Officer has dismissed all the teachers appointed during 2012, from Government service after three years, which is absolutely against the rules regulation and clear cut against the human rights and against the justice.

In the light of the above facts, it is humbly requested that to set aside the impugned dismissal order /notification that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station.



Asma Noreen D/O Nawab Khan,
Village Dhodial Mohallah Malkal,
Tehsil & District Mansehra

13503-8027604-8

Attested



Muhammad
District Council Member

7604-8
 2011/01

حکومت و تعمیرات حکومت صوبہ خیبر پختونخوا

نمبر	تاریخ	موضوع	محل	مبلغ	نوع
1	2011-05-31	تعمیرات	پشاور	1000	معمولی
2	2011-06-05	تعمیرات	پشاور	1000	معمولی
3	2011-06-05	تعمیرات	پشاور	1000	معمولی
4	2011-06-05	تعمیرات	پشاور	1000	معمولی
5	2011-06-05	تعمیرات	پشاور	1000	معمولی
6	2011-06-05	تعمیرات	پشاور	1000	معمولی
7	2011-06-05	تعمیرات	پشاور	1000	معمولی
8	2011-06-05	تعمیرات	پشاور	1000	معمولی
9	2011-06-05	تعمیرات	پشاور	1000	معمولی
10	2011-06-05	تعمیرات	پشاور	1000	معمولی

Pre Bid Meeting
 تاریخ: 31-5-2011 کو وقت 11:00 بجے ایک بجے
 مقام: پشاور

1) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 2) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 3) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 4) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 5) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 6) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 7) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 8) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 9) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 10) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔

0937-870861 فون

نمبر	تاریخ	موضوع	محل	مبلغ	نوع
1	2011-05-31	تعمیرات	پشاور	1000	معمولی
2	2011-06-05	تعمیرات	پشاور	1000	معمولی
3	2011-06-05	تعمیرات	پشاور	1000	معمولی
4	2011-06-05	تعمیرات	پشاور	1000	معمولی
5	2011-06-05	تعمیرات	پشاور	1000	معمولی
6	2011-06-05	تعمیرات	پشاور	1000	معمولی
7	2011-06-05	تعمیرات	پشاور	1000	معمولی
8	2011-06-05	تعمیرات	پشاور	1000	معمولی
9	2011-06-05	تعمیرات	پشاور	1000	معمولی
10	2011-06-05	تعمیرات	پشاور	1000	معمولی

1) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 2) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 3) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 4) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 5) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 6) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 7) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 8) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 9) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔
 10) پشاور میں تعمیرات کے لیے زمین کی خریداری کے لیے ایک پبلک سٹیٹنگ ہونے والی ہے۔

Attested
 W. M. Khan
 Advocate
 Courts Abbottabad

وکالت نامہ

بعدالت ۲۵۲ سرس سٹریٹ لاہور

عنوان: علیہم نوٹس مارچ بنام گورنمنٹ ایلوشن وٹرنہ

منجانب: اسد علی

نوعیت مقدمہ: اصل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب وہی کل کاروائی متعلقہ آل مقام

فہرست شدہ ذات منوی ریکورڈ کی کورٹ اور اس کے

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

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

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

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

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور 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 برآمد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم:

بمقام:

Attest

M. Asghar Khan Tanoli
Adv High Court Ala

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.768/2015

Respectfully Shewth

1. That the services appeal No: 768/2015 in respect of MST: Asma Noreen is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4064-69/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

ju

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

NOTIFICATION.

WHEREAS, ~~Mst. Asma Noreen PST~~ at Government Girls Primary School Kothri District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 2116-25 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 Dhodial where no post was lying vacant. However 02 posts were lying vacant in U/C Tanda which is adjacent to her U/C according to the list provided by DEO (F) Mansehra. She was at S.No. 01 of the merit list of her U/C under ETEA R.No.1702518. She has been appointed in U/C Tanda but wrongly adjusted at GGPS Kothri U/C Hilkot vide Endst.No.5360-84 dated 18/5/2012 at S.No.59. There was one candidate of U/C Tanda and candidate of U/C Hilkot Bibi Asia already adjusted in same order at S.No.1.

~~2. Appeal may be accepted as she was on merit and eligible for appointment in her own U/C but there was no vacancy in her own U/C and she was required to be consider to be appointed in adjacent U/C according to the policy.~~

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. 2116-25 dated 03/03/2015 and reinstate Ms. Asma Noreen PST at Government Girls Primary School Kothri District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

4064-69
Endst: No. _____ /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

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

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

Deputy Director (Female)
Directorate E&SE, KP