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BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD.

SERVICE APPEAL NO. 7849/2021

MST faiza bibi D/O Musharraf hussain r/o bherkund ,tehsil and district
mansehra DM, GGMS Ali Abad Abbottabad.....APPELLANT

VS

1 GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY
EDUCATION DEPARTMENT PESHAWAR & OTHERS.....RESPONDENTS

COMMENTS ON BEHALF OF RESPONDENT NO 1,2,3 AND 10

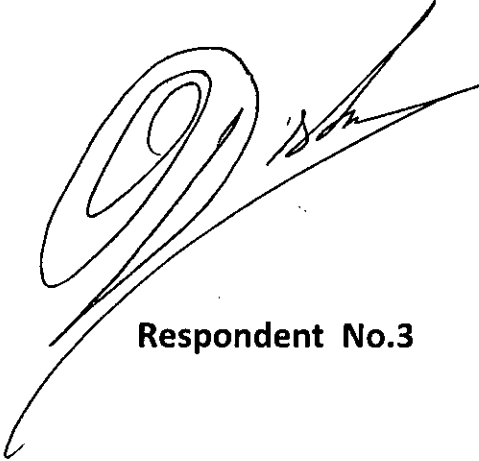
Two copy Submitted
at camp court A/D
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Respondent No.3

Dated: 20/6/2023

BEFORE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR, CAMP COURT
ABBOTTABAD

Service Appeal No: 7849/2023

Mst faiza Bibi D/O Musharaf Hussain R'O Bhair Kind, Tehsil and District
 Mansehra (PST/DM), GGMS Ali Abad Abbottabad.....

APPELLANT

Versus

Government Of Khyber Pakhtunkhwa Director Of Elementary And Secretary
 Education Peshawar & Others

RESPONDENTS

PARAWISE COMMENTS ON BEHALF OF RESPONDENT

1,2,3,4 AND 10 are as under

Khyber Pakhtunkhwa
 Service Tribunal
 Diary No. 7705
 Dated 20/09/23

Respectfully Sheweth,

Preliminary Objection:-

1. That the appellant appeal has no- locus standi/cause of action to file instant appeal.
2. That the instant appeal is based on mala fide intention.
3. That the appellant has not approached this Honorable tribunal with clean hands.
4. That the appellant has suppressing the original facts from this Honorable tribunal had not entitled for any relief.
5. That the appeal is hopelessly time barred.
6. That the appellant is treated as per rules and law and policy, therefore appellant is not entitled for any relief and hence appeal is liable to be dismissed without further proceeding.
7. That the appellant played game with the govt, public functionaries and gave huge loss to the govt exchequer through illegal means of litigation. moreover he gained benefits in the way of salary he is not entitled for any arrears of non-performance period.
8. That the instant appeal is not maintainable in its present form.
9. That the instant appeal is against the law / service rules, hence not maintainable in the eye of law and liable to dismissed.
10. That the appellant has filed the present appeal out of law. petitioner neither file departmental appeal nor annexed postal receipt, hence appeal may kindly be struck down.

Factu~~l~~ Objection:-

1. That para No 1 of the Service appeal is incorrect subject to proof, hence denied, In pursuance of competent authority respondent No 3/DEO (Female) Abbottabad issue Notification for the nomination of Inquiry officer i.e Principal GGHS No.2 and Vice Principal GGHS Nawanshere regarding absent period of appellatant, Assumption of charge and recovery of salaries on the strength of respondent No 7 vide notification Endst No: 05-8 Dated 01-01-2015, Responded No 3 issued show cause notice to the appellatant vide dated 25-04-2015 along with copy of show cause sent to the Head Mistress GGMS Ali Abad vide latter No: 7033 Dated 28-04-2015 appellatant received and reply show cause submitted on 13-05-2015, Personal hearing was conducted vide latter no: 8383/EB-II Dated 18-05-2015, during personal hearing appellatant made "Admission" regarding absent period, illegal salary drawn vide dated 21-05-2015, in the light of admission made by the appellatant "deposit salary to the extent of one lack out of Rs. 499147, after conclusion of Proceeding inquiry officer submitted the inquiry report with the recommendations 1 to 7 vide dated 07/02/2015. **(copy of showcause notice dated 25/04/2015 and 28/04/2015/ ,reply dated 13/05/2015/personal hearing 18/05/2015 / admission ,deposit of salary receipt(arrears)21/05 2015 /inquiry report dated 07/02/2015 are annexed as annexues "A""B""C" "D" "E and "F")**
2. That para No 2 of the service appeal is incorrect ,subject to prove,hence denied.while respondent No 3 sent the letter regarding verification of service/appointment record of appellatant to the respondent No 7/DEO (M)Kohistanvide letter No 10758 dated 01/01/2020,reply of respondent No 7/DEO(M) Kohistan received with the observation that no such service record /appointment order of appellatant was available in both the offices vide letter endst No 6486 dated 8/2/2020.in the above circumstances respondent No 3/DEO(F)ATD issued notification for nomination of inquiry officer Mst Khoula javed V.Principal GGHCSS Atd regarding (verification of service record/appointment order of appellatant vide notification No 1581 Dated 05/03/2020,personal hearing was conducted by the inquiry officer vide letter No 4153 dated 30/06/2020 of respondent No 3,questionair was served to the appellatant vide dated 02/07/2020 in the light of available records,previous inquiries inquiry officer submitted the report with findings that no record was found in verification vide inquiry report No 504 dated 08/06/2020. **(copy of verification letter dated 01/01/2020/ received letter from Kohistan dated 08/02/2020/ nomination of inquiry officer letter dated 05/03/2020/ personal hearing letter dated 30/06/2020/ questionair letter dated 02/07/2020 and inquiry report dated 08/06/2020 are annexed as annexures "G""H""I""J""K and "L)**
3. That para No 3 of the Sevice appeal is incorrect,subject to prove,hence denied.detailed reply have already been given in para No 1 ans 2 as mentioned above.
4. That para No 4 of the service appeal as composed is incorrect,subject to prove,hence denied,in the light of departmental appeal of appellatant submitted to respondent No 1 for adjustment other than Distt Abbottabad vide appeal no 245/EB-II Dated 18/1/2016,respondent No 1 called comments/detailed report from the respondent No 3 vide letter No 3361/F No:362(F) Appeal,a.abad dated 15/12/2017.respondent No 3 submitted comments/detailed reply vide No 245 dated 18/1/2016respondent No 1 further probe the matter and issued notification for the nomination of inquiry officer Mr Riaz swati/DEO(F) Torghar vide notification No 2472-79 dated 15/02/2018.later on respondent No 1 issued another notification for nomination of inquiry officer Mr Shehzad Principal GHS Shankiari(mansehra)regarding assumption of charge/without

respondent No 3, reply of questionnaire vide No 6363 dated 28/08/2018. Inquiry officer after conclusion of inquiry submitted report to respondent No 1 (with one or other observation) that the appellant may be adjusted in her domicile district (Mansehra) vide letter No 2863 dated 4/9/2018 along with one report dated 22/4/2018. Respondent No 6/DEO(F) Mansehra refused to adjust the appellant in her domicile district vide letter No 5298 dated 14/03/2019 (copy of departmental appeal dated 18/01/2016/letter for comments/detailed report dated 15/12/2017/ comments/detailed reply dated 18/01/2016/ nomination of inquiry officer dated 15/02/2018/another letter of nomination inquiry officer dated 10/04/2018/reply of questionnaire dated 28/08/2018/letter for submission of inquiry report dated 04/09/2018/inquiry report dated 22/04/2018/letter of DEO (F) Mansehra dated 14/03/2019 are annexed as annexure "M" "N" "O" "P" "Q" "R" "S" and "T")

5. That para No 5 of the service appeal as compared is incorrect, hence denied, detailed reply have already been given in Para 4 of the factual objections in the comments.
6. That para No 6 of the Service appeal as composed is incorrect, hence denied, detailed reply have already been given in Para 4 of the factual objection of the comments.
7. That para No 7 of the Service appeal as composed is incorrect, hence denied, detailed reply have already been given in para 2 of the factual objection of comments.
8. That para No 8 of the Service appeal as composed is incorrect, hence denied, while respondent No 1 directed the respondent No 3 in the light of departmental appeal of appellant to implement / adjustment against the vacant post of DM vide letter No 1284 dated 17/09/2018. Respondent No 3 sent the letter to respondent No 1 in the light of departmental appeal of appellant and comments/report of respondent No 3 should adjust in district Mansehra vide letter No 8496 dated 01/12/2018, while respondent No 5 suggested for adjustment of appellant in DEO(F) ATD instead of DEO(F) Mansehra vide letter no 5198 dated 14/03/2019, respondent No 1 called comments/detailed report from respondent No 5 vide letter No 2819 dated 11/04/2019, respondent No 3 submitted detailed report/comments before the respondent No 1 vide letter NO 3724-25 dated 02/05/2019, in the light of reply of respondent No 1 directed the respondent No 3 with complete record vide letter No 1289 dated 17/10/2019, respondent No 3 issued the letter to the local office for provision of complete record of service from/pay stop/ pay roll of salary and deposit of one lac deposit receipt in R/O illegal recovery of appellant vide letter No 9036 dated 26/10/2019, in the light of above circumstances respondent No 1 issued the notification with further direction vide notification No 5122-25 dated 12/12/2019, furthermore respondent no 1 issued the letter to respondent 3 for detailed comments vide letter No 4541-42 dated 01/09/2021, detailed comments/ report was submitted before the respondent no 1 vide letter No 1000 dated 03/11/2021, respondent No 1 passed the order and issued strict decision under the rule & policy vide letter No 6731 dated 17/12.2021, respondent No 1 issued order that

in pursuance of respondent No 1 order sent a letter to respondent No 7 vide letter No 1854 dated 24/02/2022. (copy of letter of respondent No 1 for adjustment dated 17/09/2018/letter of DEO (F)Abbottabd, dated 01/12/2018/letter of DEO (F) Mansehra dated 14/03/2019/ call comments by respondent dated 02/5/2019/calling of complete record dated by respondent No 1 dated 17/10/2019/letter of DEO(F)Abbottabad for provision of local record dated 26/10/2019/notification for further direction by respondent No 1 dated 12/12/2019/letter of respondent No 1 for comments dated 01/09/2021. Letter of DEO(F) Abbottabad for previous comments dated 03/11/2021/ letter/order of respondent No 1 dated 17/12/2021/letter of respondent No 3 sent to respondent No 7 dated 26/02/2022 are annexed as annexure "U"V"W"X"Y"Z"aa"bb"cc"dd" and "ff ")

9. That the para No 9 of the Service appeal as composed is incorrect,hence denied.respondent No 3 in pursuance of previous orders of respondent No 1 passed the final order regarding "least interest for adjustment her order is thus infrectuous and may be considered null and void vide notification No 5219-20 dated 10/08/2020,while appellant prefer departmental appeal to respondent No 1 vide dated 27/07/2021 which is hopelessly time barred.further detail is in para 8 of the factual objection of the comments.

(Copy of final notification dated 10/08/2020/departmental appeal dated 27/07/2021 are annexed as annexure "gg" and "hh"

10. That the para 10 of the Service appeal is incorrect subject to prove ,hence denied,detailed reply have already been mentioned as above.

Grounds

- a. That para (a) of the grounds is incorrect,subject to prove ,hence denied.appellant enter and got the benefit from the back door and did not follow the rule,regulation policy on the subject hence does not entitled for benefits,law doesn't support ill will ,deprive the appellant may kindly be struck down
- b . That para (b) of the ground as composed is incorrect ,hence denied,more so in the light of Para 1 and 2 and 8 of the factual objection inference of said final order is more much clear rather interpretation of instant ground of appellant thus the appeal of the appellant may kindly be struck down.
- c. That para (c) of the grounds as composed is incorrect ,hence denied,para 1,2,,4 and 8 of factual objection of comments are much more clear ,inference draw by the appellant is illegal,against the law and fact,hence the appeal of the appellant may kindly be struck down.

That the para (d) of the ground as composed is incorrect, hence denied, more than 1 official were terminated of the illegal act of appellant, many had been faced several inquiries, many of authorities have refused to adjust the appellant due to the illegal act and their consequences of the appellant furthermore loss the exchequer of govt with her illegal act and thus the appeal of the appellant may kindly be struck down.

e. That the para (e) of the grounds as composed is incorrect, hence denied, more so the appellant have use political as well as public pressure, which is clear from the official records, therefore appeal in hand is not mentionable hence may kindly be struck down.


f. That para (f) of the ground as composed is incorrect, hence denied, more so almost all the inquires appellant received the show cause notice, Replies the same and also give proper opportunity of personal hearing in the result of admission made by the appellant therefore Principal of "Audi alteram preterm" is not applicable in the instant case thus appeal in hand may kindly he struck down.

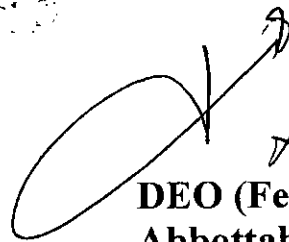
g. That para (g) of the ground as compassed is incorrect, hence denied, appellant herself use nepotism therefore service record/ appointment order is the result / outcome of nepotism against the law and fact hence appeal in hand is not mentionable due to time barred under the limitation act hence appeal may kindly be struck down.

That the other point shall be agitated at the time of arguments by the permission of honorable tribunal .

It is therefore humbly prayed that the instant appeal may kindly be dismissed with cost.

~~Stamp~~


Director (E&SE)
KPK, Peshawar
Respondent No. 3

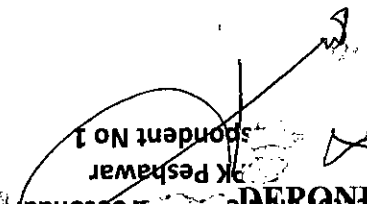

DEO (Female)
Abbottabad
Respondent No. 3

AFFIDAVIT:-

I, Mst. *Night Bibi District Education Officer (Female), Abbottabad (Respondent No.3)*, do hereby affirm and declare that the contents of foregoing comments are true and correct to the best of my knowledge and belief and nothing has been suppressed therein.

Through Representative 

Attested
Licence No. 10/Judicial/44/15
15/11/2022
20/11/2023
Abbottabad
Pakistan
MEMMOOD ADVOCATE NOTARY


DEONER
Respondent No. 1
KPK Peshawar
Secondary

Case is pending neither struck off, nor ex parte, mere cost.
in the instant case
= Reply of AAG/Pantheris are received.

~~Stamp~~

It is therefore humbly prayed that the instant appeal may kindly be dismissed with cost.

2 /

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.SHOW CAUSE NOTICE.

I Mr. Zia-ud-Din District Education Officer (Male) Abbottabad & In charge District Education Officer (Female) Abbottabad as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve Show Cause upon you Mst. Faiza Musharaf, DM GGMS Ali Abad Abbottabad as follows:

As per Enquiry Report received from Mst. Farhat Bashir Principal, GGHS No.2 Abbottabad and Mr. Abdur Rashid, Vice Principal, GHSS Nawanshehr Abbottabad Vide No. & dated 07-02-2015.

- a. You were transferred from District Kohistan & Posted at GGMS Ali Abad Abbottabad through Inter District Transfer Order by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No.2238-42/ File No.167/G dated 27-07-2012.
- b. You just after taking over charge on 02-08-2012 remained yourself will fully absent from duty and also been drawing salary w.e. from 01-09-2012 to 31-12-2014 without performing duty amounting to Rs.4,99,147/- (Rs.117487/-through manual bill and Rs.381660/-through bank account).

In exercise of the power conferred by the Khyber Pakhtunkhwa, Govt: Servant (Efficiency & Discipline) Rules 2011, the Competent Authority is hereby serve you with the instant show cause notice with the directions to submit reply within 15 days of the receipt of this notice as to why the penalties as defined in Rule 4 (a) & (b) ibid should not be imposed upon you and also intimate whether you desire to be heard in person.

In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-parte decision will be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

Mst. Faiza Musharaf, DM
Govt: Girls Middle School,
Ali Abad, Abbottabad,

COMPETENT AUTHORITY

Attested
Kvi

14

Annex B

REGISTERED

OFFICE OF THE DISTT: EDUCATION OFFICER (FEMALE) ABBOTTABAD.



No. 7633 / EB-I/Show Cause Notice.

Dated: 28 / 7 / 2015

☎ 0992-9310102
📧 District Education Officer Atd@gmail.com

To,

The Head Mistress,
Govt: Girls Middle School,
Ali Abad, Abbottabad.

Subject: - **SHOW CAUSE NOTICE.**

Memo:

Show Cause in respect of Mst. Faiza Musharaf DM of your school is attached herewith. You are hereby directed to serve the same to her and return one copy to this office as a token of receipt.

[Handwritten signature]
**DISTRICT EDUCATION OFFICER (F)
ABBOTTABAD.**

*Attested
[Signature]*

15

88

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

SHOW CAUSE NOTICE.

I Mr. Zia-ud-Din District Education Officer (Male) Abbottabad & In charge District Education Officer (Female) Abbottabad as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve Show Cause upon you Mst. Faiza Musharaf, DM GGMS Ali Abad Abbottabad as follows:

As per Enquiry Report received from Mst. Farhat Bashir Principal, GGHS No.2 Abbottabad and Mr. Abdur Rashid, Vice Principal, GHSS Nawanshehr Abbottabad Vide No. & dated 07-02-2015.

- a. You were transferred from District Kohistan & Posted at GGMS Ali Abad Abbottabad through Inter District Transfer Order by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No.2238-42/ File No.167/G dated 27-07-2012.
- b. You just after taking over charge on 02-08-2012 remained yourself will fully absent from duty and also been drawing salary w.e.from 01-09-2012 to 31-12-2014 without performing duty amounting to Rs.4,99,147/- (Rs.117487/-through manual bill and Rs.381660/-through bank account).

In exercise of the power conferred by the Khyber Pakhtunkhwa, Govt: Servant (Efficiency & Discipline) Rules 2011, the Competent Authority is hereby serve you with the instant show cause notice with the directions to submit reply within 15 days of the receipt of this notice as to why the penalties as defined in Rule 4 (a) & (b) ibid should not be imposed upon you and also intimate whether you desire to be heard in person.

In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-parte decision will be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

Mst. Faiza Musharaf, DM
Govt: Girls Middle School,
Ali Abad, Abbottabad.

[Signature]
COMPETENT AUTHORITY.

*Attested
to*

16

Annex "C"
[Signature]

13/5/15
[Signature]

District Education Officer (F)
Abbottabad.

Subject : REPLY OF SHOW CAUSE NOTICE VIDE NO. 7033/EB-1/SHOW CAUSE NOTICE DATED 28-04-2015.

Dear Madam/Sir,

Most respectfully it is stated that parawise comments are as under:-

- a) Correct I was transferred from District Kohistan and posted at GGMS Ali abad through Inter District transfer order.

I was not willful absent from duty. I was always willing to perform duty, my father in law was admitted in hospital being heart patient and I was also pregnant (Maternity issue, child birth 28-08-2012) both certificate are attached.

It is also brought in your kind notice that I was not reported as absent by any authority from the office of DEO(F), but I myself visited the DEO (F) office in December, 2014 and reported my whole case to DEO(F), if I was culprit, I should have kept the authority in dark, but I approached the office and told the authorities about my problems and related complications.

It is requested that keeping in view my personal initiative in this case, I may be provided justice and adjusted anywhere in Abbottabad against vacant post. I was sincere and told the department real situation.

- b) In connection with drawl of pay for disputed period, it is stated that I myself brought the case into notice of authority, therefore I am ready to refund the amount into Government treasury in the shape of advance and installment any time.

Dear Madam /Sir

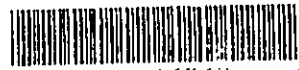
It is requested that keeping in view my sincerity because I did not keep the department in dark and my willingness to deposit amount for disputed period into government treasury and being poor financial position of my family. I may be exonerated from charges and adjusted at any vacant post in Abbottabad. I am also ready to appear in person if you direct me. I hope that being female and only earning hand and I will be provided justice.

EB-II
Received
[Signature]
13/05

Attested
[Signature]

Yours Obediently,
Faiza
Faiza Musharaf, DM
Govt. Girls Middle School,
Ali abad, Abbottabad.

17



P04414248

165

حکومت خیبر پختونخوا پاکستان

THE GOVT OF KHYBER PAKHTUNKHWA PAKISTAN

پیدائش سرٹیفکیٹ

BIRTH CERTIFICATE

FORM No: P04414248

FORMS No: B135043-15-0710

درخواست دہندہ کا نام: عہسان الحق

1350304969249

رشتہ: بیٹا

درخواست دہندہ کا شناختی کارڈ نمبر:

پیدائش کا سال / تاریخ	مذہب	جنس	والدہ کا نام / شناختی کارڈ نمبر	والد کا نام / شناختی کارڈ نمبر	بے کا نام
28-8-2012	اسلام	مرد	فازہ بی بی	عہسان الحق	شہ حسنات

28-8-2012

1350395307462

1350304969249

APPLICANT'S NAME: EHSAN UL HAQ

APPLICANT'S CNIC NO: 1350304969249

RELATION: SON

CHILD'S NAME	FATHER'S NAME / NIC NO	MOTHER'S NAME / NIC NO	GENDER	RELIGION	DISTRICT AND DATE OF BIRTH
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SHAILER HASRAF

EHSAN UL HAQ

FAIZA BIBI

MALE

ISLAM

MANSEHRA

1350304969249

1350395307462

23-8-2012

GRAND FATHER'S NAME: ABDUL LATIF

دا لوکا نام: عبداللطیف

GRAND FATHER'S CNIC NO:

دا لوکا شناختی کارڈ نمبر:

بیٹا اندراج:

نادر اندراج:

تاریخ اندراج: 6-5-2015

پتہ: محلہ سوئی، گاؤں بھیرکنڈ، ڈاکخانہ بھیرکنڈ، تحصیل مانسہرہ، ضلع مانسہرہ

ADDRESS: MOHALLAH SWATI, VILLAGE: BHERKUND, POST OFFICE: BHERKUND, TEHSIL: MANSEHRA, DISTRICT: MANSEHRA

SECRETARY

Union Council Bherkund

6-5-2015

Attested
Kia

18

(Signature)

Ayub Teaching Hospital ABBOTTABAD

Department of Cardiology

Name: Abdul Latif

Age: 65 years

Cath. Number/date. 196, 15/08/2012

SEX: Male

Address: Abbottabad

History: hypertension, admitted with NSTEMI.

Right Radial Approach (due to spasm Left done via RFA)

Catheter : 6F, 4J right & 3.5 Left

Haemostasis secured with pressure.

Operator 1 : Dr Umar Hayat.

RCA : Dominant, large. Medium size PLV and PDA branches. Minor plaque in proximal part and after the bend. No flow limiting disease.

Left Main: Medium size and Normal.

LCX: Medium caliber vessel Small AV, medium size OM1 with series of stenosis starting before smallish AV (vessel size 2.5, will need long 23mm + stent).

LAD : Medium size vessel with small caliber diagonal. Critical stenosis at the bend of LAD. (2.5 x 18mm+ stent). LAD is smallish distally and tapering.

Conclusion: Critical LCx (series of stenosis needing Long DES stent). LAD tubular stenosis at the bend, needing 2.5 x 18mm+ DES stent. Antero-apical segment seem hypokinetic/ akinetetic on angio. Will need ECHO and may be viability studies for before further intervention.

Recommendations: Optimize medical treatment / ECHO / PCI to LAD and LCX with DES stents.

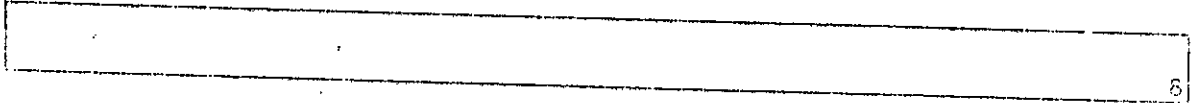
(Signature)
Dr Umar Hayat
Senior Consultant ATH
Associate Professor AMC.

(Signature)
Attested

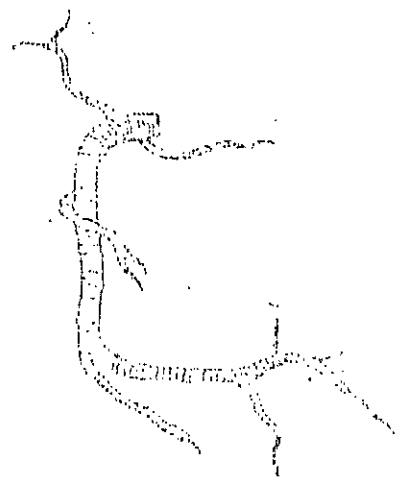
(Handwritten)
Adv viability / ischemia study

19

~~13~~



5



Detail
at Bend

Crude

20

a 21

Amended

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.
No. 2383 /EB-II
Dated 18/5 /2015

To

The Mst:Faiza Musharaf , DM
GGMS Ali Abad.
C/O Musharaf Hussain R/O Mohallah Bair Kund
Tehsil & District Mansehra.

Subject: PERSONAL HEARING.
Memo,

Reference your reply to the Show Cause Notice received in this office on 13-05-2015. You are directed to appear for personal hearing on 21-05-2015 before the undersigned for further necessary action.

You are further directed to deposit Rs.499147/-drawn for absence period into the Govt. treasury through Challan & copy be provided.

Saminah Khan
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.

M. Faiza
M. Musharaf
18 5 15

Allocated
Sp

میں سماعت ٹائزہ بی بی DM علی آباد آج مورخہ 21/5 بروز

چھراک نوالہ جمنی ٹری 8383 مورخہ 18/5/2015 از دفتر DEO آگیا

ایسٹ آباد حاضر ہو کر بیانی ہوا کہ قبیری خلاف

جو انصاف شہہ ہزار نوٹس مورخہ 28/4/2015 جمنی ٹری 7033

لگائی گئی ہیں وہ دست ہیں 4 ر میں نے جو رقم غیر حاضر

ڈیپوڈ کی مبلغ 499141 روپے غیر حاضر عرصہ اس درجہ کی

ہے دینے کے لیے تیار ہوں اور دوں گی

اساتے پخت میرے ایسٹ ہے کہ ایسٹ آباد میں ایسٹ

کیا جائے۔

اگر عملن یونٹ کے نو بڑے کرم یہ رقم چھو سے انصاف

میں وصول کی جائے۔

اپنا راکھ ایڈوانس میں اور پائی انصاف میں جمع کرواؤں

گی۔

Faiza - 03479314983

21/5/2015

ڈی آسٹ: محمد رفیع

مدیر - عابدہ نازین

سرپرست - محمد رفیع

0992-406216

مدیر ایڈوانس

Admitted
Fai

22

Assmer E

7770 Code 7045

STATE BANK OF PAKISTAN

dated the 08 of 06 2015

Received from the bearer Faiza Mustafa
the sum of Rs. 10000/- one lac only
to be credited to Government account under the head.....
on account of C.O. 2814 R/O/16

This portion to be returned to the payee 10000 stipulated by the Agent.

Note - The Bank Agent is instructed not to receive money unless both portion the invoice are carefully and clearly filed in.

RECEIVED
10000
10/06/15
61392

See reverse

NWFP A&T 200

Attested
[Signature]

97

23

PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

Date _____
Page No. _____

TRN No. 180
20/12/16

OFFICE OF THE _____ DEPT. of EDUCATION

FOR THE MONTH OF _____ DECEMBER 2016

DDO Code (Cost Center) AD7045 Description DEPT. of EDUCATION

Personnel Number 60515873

Employee Name FAIZA MUSHARAF

National ID Card Number _____

Grade (Pay Scale Group) 15 D-III

Salary Status Start Drop

Approved

Info ¹⁴ Type	Field ID ¹⁴	GENERAL DATA CHANGE ¹⁵ New Contents ¹⁶	Wage Type ¹⁷	CHANGE IN PAYMENTS / DEDUCTIONS ¹⁷ Amount			Effective Date ²¹	Remarks ²²
				Rupees ¹⁸	Paise	Adj ²⁰		
		Pay Increase	1500	172224			Pay Increase done to meet provision of the Govt. the concerned Teachers pay. Please refer to...	

Prepared by: [Signature]

Checked by: _____

Entered / Verified By: _____

24

230

General No. 16074

OFFICE OF

CAS

290

RECEIPTS

No. of Receipt when necessary	Particulars	Amount		Contingencies				Miscellaneous				
		Rs.	P.	Rs.	P.	Rs.	P.	Rs.	P.	Rs.		
37/12/57	Office	1581										
38/7/57	Office	1581										

[Signature]
 District Education Officer
 (female) Abbottabad

AKMAL
[Signature]

25

Month April/2013 199
08/291

25

PAYMENTS

Pay	Allowances				Contingencies				Miscellaneous		Total		Classification
			Out of Permanent Advance		Out of money drawn in anticipation of Payment				Rs.	P.	Rs.	P.	
	Rs.	P.	Rs.	P.	Rs.	P.	Rs.	P.					
Concerned											1581/13		Am
											1581/18		Am
											1581/18		Am
													Am
													Am
													Am
													Am
													Am
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													Am
													Am
													Am
													Am

Di District Education Officer
(Female) Abbottabad

certified that I have checked the
Bank of the End of this Month and
corrected the fully with shown in
Bank and also disbursed amount
Payee concerned Cash. As per is given

Di District Education Officer
(Female) Abbottabad

Attended
Am

26

General Ledger

OFFICE OF

CA

292

RECEIPTS

No. of Receipt (where necessary)	Particulars	Contingencies				Miscellaneous		
		Pay to order of	Advances	Advance	Advance	Rs.	P.	Rs.
285	Office to Bala							2862
285	Office to Bala							2862
11520	LIB receipt via S...							6542
341537	Office to Bala							42390
341609	Office to Bala							6272
Total								

(District Education Officer) (Female) Abhottabad

Abhottabad

27

27

293

DOK

PAYMENTS

Sub- Voucher Number	Particulars	Pay		Contingencies				Miscellaneous		Total		Classifi- cation
		Allowances		Out of Permanent Advance		Out of money drawn in anticipation of Payment		Rs.	Pa.	Rs.	Pa.	
		Rs.	Pa.	Rs.	Pa.	Rs.	Pa.					
	Paid to Concerned									286259		A
	Paid to concerned									228131		A
	Paid to concerned									65474		A
	Paid to concerned									47399		A
	Paid to concerned									6272437		A
	Total									6272437		A
	Excess									000		A
	Balance											A

By District Education Officer
(Female) Abbottabad

Certified that I have checked the Cash Book of the end of the month and found correct it is fully with shown in Cash Book and also disbursed amount to the concerned persons hand in "NIL"

By District Education Officer
(Female) Abbottabad

Checked

(20)

OFFICE OF

CLASS

294

RECEIPTS

Sl. No.	No. of Receipt where necessary	Particulars	Contingencies				Miscellaneous	Total
			Salary to staff	Allowances to staff	In recognition of Permanent Advance	Advance Payment		
			Rs.	P.	Rs.	P.	Rs.	P.
		Opening Balance						
3952		Ac Bill					22028	22028
		16/13						
4354		Amount Pay Retiree & others					78526	78526
		17/2013						
3247		T.A. + A. Bill					44487	44487
		16/13						
43324		PIESTB	4738				4738	4738
		11/13						
43342		Ac Bill					650	650
		4/13						
43664		Amount Pay	12114				12114	12114
		16/13						
43573		Ac Bill					10772	10772
		7/13						
43528		Ac Bill					26800	26800
		16/13						
43570		Ac Bill					5780	5780
		16/13						
43594		Ac Bill					10800	10800
		16/13						
445699		ATA Bill					18000	18000
		23/13						
							392133	392133

By District Education Officer
(Comptroller)

Attested
/s/

29

Month.....

295

OK

PAYMENTS

Particulars	Pay		Contingencies				Miscellaneous		Total		Classification
	Allowances		Out of Permanent Advances		Out of money drawn in anticipation of Payment		Rs.	Ps.	Rs.	Ps.	
	Rs.	Ps.	Rs.	Ps.	Rs.	Ps.					
Paid to Council										22028	A
Paid to Council										78426	A
Paid to Council										44488	A
Paid to Council										47354	A
Paid to Council										6500	A
Paid to Council										12142	A
Paid to Council										10772	A
Paid to Council										26809	A
Paid to Council										5780	A
Paid to Council										10800	A
Paid to Council										18000	A
Paid to Council										392133	A
Paid to Council										392133	A

Cash is held in the account of the Council. The amount shown in the account is Rs. 114. The amount shown in the account is Rs. 114. The amount shown in the account is Rs. 114.

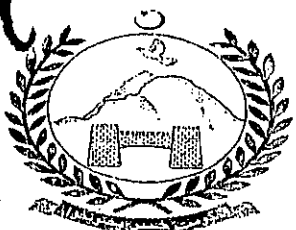
[Signature]
 Dy. District Education Officer
 (Female) Abbottabad

[Signature]
 Dy. District Education Officer
 (Female) Abbottabad

Attested
[Signature]

30

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 264-661

Dated: 16-1 /2015

0992-342533, 0992-342314

Deofemale.abbottabad@gmail.com

To
*District Education Officer,
(Female) Abbottabad.*

Subject: Enquiry Pertaining the Absence Period of Mst. Faiza Musharaf (DM) GGMS Ali Abad (Questionnaire).

Memo:

Reference questionnaire on the subject cited above wherein the Undersigned has been directed to submit reply to the questionnaire in absence period of subject teacher.

It is requested that the Undersigned is unable to furnish reply in the subject case in absence of the service record of the teacher concerned, therefore, her complete service record may kindly be provided within three days, so that reply could be given.

[Signature]
Dy: District Education Officer
(Female) Abbottabad

Endst No & Date Even

Copy to:

1. Enquiry Officer, Mr. Abdur Rasheed, Principal, GGHS Nawansher, Abbottabad.
2. Miss. Farhat Basheer, Principal, GGHS No.2 Abbottabad

[Signature]
Dy: District Education Officer
(Female) Abbottabad

*Attested
E.N.*

سوانح نامہ تمام دیسی حکام اور سپرنٹنڈنٹ (حکامی اور مذہبی) گورنمنٹ سکولز اور کالجوں کے قیام کے بارے میں -

آپ کے تذکرے کے لیے آپ مذکورہ بالا انتظامی کے حصے میں درج سوالات کے جوابات دینا چاہیں گے۔
1. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
2. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
3. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
4. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں

1. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
2. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
3. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
4. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں

5. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
6. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
7. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
8. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں

9. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
10. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
11. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
12. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں

13. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
14. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
15. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
16. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں

17. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
18. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
19. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں
20. سہ ماہی کے سلسلے میں دیسی حکام کے نام و کھانڈے کے بارے میں

Attached
ہیں

منشیہ والا جوابات درج ذیل ہیں
 منشیہ انٹری فائزہ سی ڈی ڈی ایم

1) منشیہ نمبر I کا سوال سراسر غلط اور بے بنیاد ہے۔ انکو انٹری ٹکنی کے سامنے
 جب فائزہ سے پوچھا گیا کہ آپ منشیہ عابدہ کو جانتی تو اس نے جواب دیا
 میں اور نہ ہی منشیہ عابدہ نے مجھے پکارا دیا، اسی سوال کا جواب جب
 منشیہ عابدہ نے دیا تو اس نے کہا جب سے اسے
 انٹری سے منشیہ سے پکارا دیا تو اس نے کہا کہ کیا کروں تو
 اسے سے منشیہ سے پکارا دیا۔

2) منشیہ نے اس سے تفصیل سے جواب حاضر کیا کہ میں نے پکارا دیا،
 3) جب پکارا دیا تو منشیہ نے اس سے کہا کہ اس سے منشیہ سے
 منشیہ نے اس سے کہا کہ اس سے منشیہ سے منشیہ سے

منشیہ سے کہا کہ اس سے کہا کہ اس سے کہا کہ اس سے
 منشیہ سے کہا کہ اس سے کہا کہ اس سے کہا کہ اس سے

منشیہ نمبر 4 میں جواب حاضر ہے۔ اس ضمن میں ریپورڈ مسئلہ اگاہت
 منشیہ سے کہا کہ اس سے کہا کہ اس سے کہا کہ اس سے
 منشیہ سے کہا کہ اس سے کہا کہ اس سے کہا کہ اس سے
 منشیہ سے کہا کہ اس سے کہا کہ اس سے کہا کہ اس سے

Attached
 منشیہ

process کے تحت کام ہوتا ہے۔ صرف DD اس کے کوئی کام نہیں کرے گا۔
کولر کے میٹریٹل، اگاڈنٹ اور EDO کے ذریعے سے کام لیا جاتا ہے۔
جو زیادہ تر اس میں پھینک دیا جاتا ہے۔ حالانکہ ساتھ ساتھ دیگر ڈیٹا بھی

اور میٹریٹل ٹینڈر (یا فیکٹری) میں رکھ کر ٹھیکہ دار کو دیا جاتا ہے۔ اور فیکٹری
جب اس کے حالات سے آگاہ ہوتی ہے تو یہ کارروائی عمل میں لاتی ہے۔

ستمبر 2013 سے دسمبر 2014 تک جو میٹریٹل کاٹیا گیا اور نہ ہی اس وقت
DD کو اسٹوریج میں شامل کیا گیا۔ یہ سب سمجھ میں ہے۔ فیکٹری میں

جب سے انٹیمال بیماری کی حالت (sickness) کی حالت میں ہیں
تو یہ ذمہ داری سے کام لیا اور اب بھی *Transplant* کے بعد ہی کام

میں مبتلا کیا جا رہا ہے۔ جو میٹریٹل سے کام لیا گیا ہے۔ اسے ڈیٹا کو
اسی طرح *Transplant* کو ایک سال بھی نہیں ہوا۔ یہ سب کچھ

میں اسٹوریج کی حالت ہے۔ ماہ نومبر 2013 میں جب فیکٹری لائی گئی
تو اس کے اگاڈنٹ میں آئی تو میں سب سے پہلے لائی گئی

جو سب سے پہلے لائی گئی۔ اس کے بعد دوسرے لائی گئے۔
2014 میں سب سے پہلے DD کا ڈیٹا کوٹنگ شروع ہوئی اور اس کے بعد

تو اس کے بعد لائی گئی۔ اس کے بعد دوسرے لائی گئے۔
تو اس کے بعد لائی گئی۔ اس کے بعد دوسرے لائی گئے۔

دعا گو
ڈی ڈی اور زمانہ صلاحتی اسٹاپ آباد

Attested
نہ

Handwritten signature or stamp

(34)

Annul F²⁷

Enquiry Report

Caption of Enquiry:	Mst Faiza Musharraf was transferred to GGMS Ali Abad from Distt. Kohistan, through inter district transfer but failed to join her duty with in stipulated time.
Enquiry Committee:	Mst Farhat Bashir Principal GGHS No.2 Atd and Mr. Abdur Rashid V/P GHSS Nawan Shehr vide notification issued under Endst No. 05-8 dated 01-01-2015 by DEO(F) Atd.
TOR's	<ul style="list-style-type: none"> ➤ Willful absence from duty / not resumption of charge of the post properly. ➤ Drawal of pay from Govt. treasury for not being at the strength of DEO(F) Abbottabad.
Procedure:	<p>For the purpose, probing into the TORs, the enquiry committee served the questionnaire to:-</p> <ol style="list-style-type: none"> 1. I/C GGMS Ali Abad, Mst. Saeeda Bibi. 2. Dy DEO(F) the DDO also, Miss Abida Shaheen. 3. The accused teacher Mst Faiza Musharraf DM and also persued the record as under: 4. Service Book of the accused. 5. First appointment order, change of Cadre order, and transfer (Inter Distt) order. 6. Cash Book, Pay print for the month of April, May, June 2013, Arear drawn from 01-09-2012 to 31-3-2013. <p>Following documents were demanded from the Office of DEO(F) but could not be provided:-</p> <ol style="list-style-type: none"> 1. NOC accorded to the accused and availability of post. 2. Copy of pay print wef. 07/2013 to 09/2013. 3. Statement of count r/o accused. 4. Copies of change form(Source). 5. Total amount Paid/drawn from Govt. Treasury in term of the pay of the accused wef 01-09-2012 to 31-12-2014.
Brief History:	<p>Mst Faiza Musharraf is permanent resident of Distt. Mansehra Tehsil Balakot as per domicile. But in her service book her permanent address has been found recorded as Bairkund Mansehra and she is close relative of Ex. EDO Kohistan Mr. Mukhtiar Khan Swati. She was appointed as PST without having certificate of PTC in Distt. Kohistan in 2009. Her Cadre was changed from PST to DM(BPS-9 to 12). Both the orders were passed by Mukhtiar Khan as EDO Kohistan.</p> <p>On 27-07-2012 with the help of the same officer she was posted at GGMS Ali Abad through inter district transfer by Director E&SE Peshawar. The record of NOC for availability of post is not available in the office of DEO(F) Abbottabad. She bitterly failed to comply with the order and did not resume her charge at GGMS Ali Abad Abbottabad. For the first time she appeared on scene in the month of Jan 2013 when she approached to I/C school at home during winter vocation for resumption of charge but I/C School refused to hand over charge for being too late and brought the matter into the notice of DEO(F) Office. In this way her transfer order became infructuous automatically. Office sources revealed that Mr. Mukhtiar Khan has been visiting DEO(F) office and found sitting with Ex-Dealing Clerk M. Shafiq. A bogus charge report was prepared, perhaps in the</p>

Mst Faiza Musharraf
 Mst Farhat Bashir
 Mr. Abdur Rashid
 Mst Saeeda Bibi
 Miss Abida Shaheen
 Mst Faiza Musharraf
 Mst Saeeda Bibi
 Miss Abida Shaheen
 Mst Faiza Musharraf
 Mst Saeeda Bibi
 Miss Abida Shaheen

Accepted
 hi

	<p>month of April 2013 and sent it to DAO for activation of her pay. But DAO raised objection on change of Cadre. DDO Abida Shaheen recorded a certificate in the S/Book of the teacher regarding the change of Cadre from PST to DM under her signature. After compulsory retirement of Mr. Shafique D/A and shifting of DDO ship to DEO(F) Samina Iltaf, the matter was disclosed.</p>
<p>Fact/Findings:</p>	<p>The situation was analyzed, the record, questionnaires and service record of the teacher were minutely perused. The enquiry reached to the following facts:</p> <ol style="list-style-type: none"> 1. Basically, her appointment as PST and later on change of Cadre are doubtful and illegal. 2. Her transfer from Distt. Kohistan to Distt. Abbottabad is malafide for the reason that she was appointed in Distt. Kohistan through low merit /illegal means to serve in said Distt. whereas for appointment in Distt Abbottabad needs very high merit and tough competition, Secondly she belonged to Distt. Mansehra not Distt. Abbottabad and thirdly the record of NOC for availability of post is not available in DEO(F) and no body is ready to shoulder the responsibility thereof. She is liability for Distt: Abbottabad. 3. She did not resumed her charge with in stipulated time and her transfer order had become infructuous when she made effort for charge with delay of about 6 months. It is further added that she was relieved from Distt: Kohistan on <u>29-08-2012</u> wef 31-08-2012 but she tried to get the charge of the post in Distt: Abbottabad wef 02-08-2012 i-e retrospective date as mentioned on the body of so called charge report. It is clear cut forgery case. 4. Drawal of her pay wef. 01-09-2012 and upgradation from BPS-09 to 15 is illegal and responsibility therof rests on the shoulder of dealing hand and concerned DDO as valid record of handling over charge is not available in paper and in her service book. 5. It is astonishing to observe that her pay was activated on 15-04-2013 as her record of sevice book, by DAO but drawn manually in the months of April, May and June 2013 and embezzled as it was neither paid to concerned nor recorded in Cash Book. 6. Arrear of the pay of the teacher was drawn wef. 01-09-2012 to 31-03-2013 (07) month Rs. 117487/= but neither paid to the teacher nor recorded in Cash Book and bungled by the dealing hands. 7. Rs. 42354/= found recorded in S/Book with receipt by the teacher concerned but she totally denies the receipt, it is fake entry which was not to be made in S/Book otherwise the amount has been embezzled. 8. Record of pay wef 01-07-2013 to 31-10-2013 is not available anywhere in the office of DEO(F). It is assumed that pay of these three months have also been drawn and embezzled. 9. In the month of Sep 2013, Dy DEO Mst Abida Shaheen was transferred to Distt. Haripur. It is noteworthy that just after one month of her transfer the pay of the teacher was drawn through pay print and sent to her bank account. 10. The teacher confessed that she, for the first time received her

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pay wef 01-11-2013 to 12/2014. She was ignorant of the amount drawn as her salary wef 01-09-2012 to 31-10-2013. It means that her pay was drawn through illegal means wef 01-09-2012 to 31-10-2013 that was not paid to her and embezzled by Dealing hands and DDO herself.

- 11. The teacher as well as DDO are ready to refund the salary drawn from Govt. treasury without handing/taking over charge to the teacher in Distt Abbottabad(Questionnaire).
- 12. All this happened due to the incompetence of the DDO Mst Abida Shaheen who is occupying very responsible position but not ready to shoulder the responsibility, thereof. She has failed to provide cogent reasons about the charge of the teachers and drawl of her illegally and unlawfully and shifting the responsibility to the dealing hands and the teachers concerned.
- 13. The DDO is of the opinion that the teacher has unlawfully drawn the pay, she forgets that no individual employee can draw her pay by herself. It is DDO who draws/disburse the salary observing the coddle formalities. She, as DDO, bitterly failed to do her job demanded by her position. She shares equal responsibility with dealing hands. Furthermore, her reply of questionnaire is not satisfactory and relevant to the questions asked.(Copy annexed)

Recommendations:

- 1. The teacher has not taken over charge in Distt. Abbottabad. Her transfer order has become infructuous, she may not be considered on the strength of DEO(F) Abbottabad, and be sent back to Distt Kohistan for disciplinary proceeding.
- 2. The salary of the teacher drawn wef 01-09-2012 to 31-10-2013 be recovered from dealing hand Mr. M. Shafique and DDO Mst Abida Shaheen to the Govt treasury.
- 3. Salary drawn wef 01-11-2013 to 31-12-2014 be recovered from the teacher concerned to the Govt. treasury.
- 4. Manually drawn pay and arrears during the DDO ship of Mst Abida Shaheen and M. Shafique as dealing clerk should be investigated and reconciled from the recipients to make sure the payment to the concerned.
- 5. Mr. Shafique, the dealing clerk should be dismissed from service without any benefit rather to make him proceed on compulsory retirement. His case should be referred to anticorruption department for legal proceedings.
- 6. It is not a single case of corruption and embezzlement, there is chain of corrupt practices being carried on making the DEO(F) office, a bargain centre, the matter should be brought into the notice of Director E&SE and Secretary E&SE KPK for necessary measures/steps while posting/transferring the officers against such a important positions.
- 7. The appointments made in Distt: Kohistan are mostly through bargaining/out of merit and without having proper educational qualifications, should be restricted to the Distt: concerned. All the teachers appointed at PST/CT/DM/TI/Qari/AT etc, the Distt: Cadres, appointed in Distt: Kohistan. And posted/transferred to Distt: Abbottabad should be sent back to their respective Distt, on the strength of which they got their appointments. They are liabilities for Distt: Abbottabad and should be disposed off. The

*Attended
Sum*

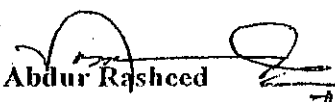
37


opportunity should given to candidates highly qualified, waiting for appointment from Distt: Abbottabad against the vacant post on merit in the best interest of generation to come. As it is common business to get employment in Distt: Kohistan and later on seek transfer to the other Districts vacating the in Distt: Kohistan for further business. This is illegal practice and should be stopped.

49

No. _____ Date. _____

Report submitted to DEO(F) E&SE Abbottabad.


Abdur Rashheed
V/P GHSS Nawanshehr 7/2/2015
Abbottabad.


Principal
G.G.H. School
No. 2 Abbottabad
Farhat Bashir
Principal
GGHS No. 2
Abbottabad.

- Enclosed:
- 1. Service Book original.
 - 2. Attendance register original for GGMS Ali Abad
 - 3. Questionnaires from
 - 1. DY DEO (F)
 - 2. Saeeda Bibi / GGMS Ali Abad
 - 3. Farza Bibi the accused teacher.

Abdusheed
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Armeen G

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 10758 /EB-ii/Faiza Musharaf Dated A.Abad the 1/1/2020

To,

The District Education Officer,
(Male) Dassu upper Kohistan

Subject: VERIFICATION OF SERVICE RECORD/APPOINTMENT ORDER IN R/O FAIZA BIBI

Memo:

It is brought into your kind notice that Mst: Faiza Bibi D/O Musharaf Hussain R/O District Mansehra has been appointed as PST at GGPS Banseri District Kohistan vide District Education Officer (Male) Kohistan under endst: No.280-85 dated 02.12.2009 (copy attached). After one year service as of PST her cadre was changed from PST BPS-7 to DM PBS-9 vide endst: No.628-33 dated 02.12.2010 and posted at Government girls Middle School Sayal Jashoi Kohistan (copy attached).

In this regard, you are hereby requested to please verify the above mentioned notification and inconvenience in this regard is highly regretted.

DISTRICT EDUCATION OFFICER,
(FEMALE) ABBOTTABAD

Endst: No. 10759 /EB-II /Faiza

Dated Abbottabad the 1/1/2020

Copy to the:-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar for information and further necessary action please.

DISTRICT EDUCATION OFFICER,
(FEMALE) ABBOTTABAD

01/01/2020

Attested
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OFFICE OF THE DISTRICT EDUCATION OFFICER (F)
KOHISTAN UPPER



No. 6456 /DEO (F) KH-U Dated Dassu the 8 / 2 2020

To,
The District Education Officer,
(Female) Abbottabad

Subject VERIFICATION OF SERVICE RECORD /APPOINTMENT ORDER
IN RESPECT OF FAIZA BIB

Memo,
Reference your office letter No 1075/EB-ii/ Faiza Mushraf Dated 01/01/2020 on the subject noted above.
In this connection an inquiry was conducted through the Ex Deputy District Education Officer (F) Kohistan Mr: Abdul Rehman.
According to the findings of that inquiry report no such record be traced.
Hence this office is unable to verify the service/cader change record of Mst Faiza Bibi D/M (the inquiry report is also attached.)
The report is submitted for further information please.

[Signature]
District Education Officer
(Female) Kohistan

E/No: Estt/ Sec/ DEO (F) Dated 2020.

Copy is the above is forwarded to.

- 1. P A to Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2. Dy: DEO (F) Kohistan
- 3. P A to DEO (F) Kohistan
- 4. Office record

D/A
[Signature]
District Education Officer
(Female) Kohistan

Attended
[Signature]

12/02/20

435
13/2/20

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OFFICE OF THE DEPUTY DISTRICT EDUCATION OFFICER (FEMALE)
KOHISTAN

To,

|C|

The District Education Officer
(Female) Kohistan

Subject: INQUIRY IN R/O MST. FAIZA MUSHARAF DM.

Memo,

Reference letter No.6806/F.No 362/F/appeal/Vol-1/Abbottabad dated
24/05/2019 issued from Director Elementary & Secondary Education Peshawar.

In this regard I was directed to check the record and report.
I visited DEO(M) Office Kohistan because all record of EDEO office is
lying there, no any record was found there about the said teacher.


Then I visited the DEO(F) office Abbottabad. I received the following
photo copies from there.

01. Office Order regarding change of cader.
02. Relieving Chitt.
03. Appointment order of PTC.
04. LPC.

But no any record found in Kohistan female/male office.

The signatory EDO/officer of these documents verified his signature on
telephonic message.

Hence the report is submitted for necessary action please.


Deputy District Education Officer
(Female) Kohistan

Attested
[Signature]

41

Annex I

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



[Handwritten mark]

☎ 0992-342533, 0992-342314
✉ deofemale_abbottabad@gmail.com

NOTIFICATION:

Mst. Khoula Javed , V/Principal GGHCSS Abbottabad is hereby appointed as Enquiry Officer to conduct enquiry regarding verification of service record/appointment order in respect of Mst: Faiza Musharaf DM under transfer from Kohistan to Abbottabad District to probe in to the matter and submit report with facts/findings recommendations within 07 days positively for further action

[Signature]
District Education Officer
(Female) Abbottabad

Endst No: 1581- dated: 5/3 /2019
Copy to:

1. Mst. Khoula Javed, V/Principal GGHCSS Abbottabad, Enquiry Officer, Abbottabad.
2. Office File.

[Handwritten signature]

District Education Officer
(Female) Abbottabad

[Large handwritten signature]

Attended
[Signature]

05/3/2019
[Signature]

42

Amir J
~~CAJ~~

OFFICE OF THE DISTRICT EDUCATION

OFFICER (FEMALE) ABBOTTABAD

No. 11757/EB-II P. hearing Dated 20/02/2020

PH# No. 0992-342533 FAX: 0992-342314

E-mail deofemale_abbottabad@y.boo.com

To

Faiza Musharaf EX-DM
GGMS Ali Abad District A. Abad.

Subject: PERSONAL HEARING.

Memo

You are hereby directed to appear for personal hearing before competent Authority in connection with further proceeding on Thursday 02/07/2020 at 11:00 am at the office of the District Education officer (Female) Abbottabad.

You are further directed to bring relevant record on fixed date & time.

District Education Officer
(Female) Abbottabad

Received

Faiza
20/2/20

Attested
Amir

7
2/2020
سوالنامہ برائے فائزہ شہزادہ سابقہ ڈائریکٹر سائبر سیکورٹی ایف آئی اے

1۔ آپ کا پورا نام کیا ہے۔ فائزہ بیگم

2۔ آپ کے والد کا نام کیا ہے۔ مشرف حسین

3۔ آپ کی تاریخ پیدائش کیا ہے۔ 02-02-1986

4۔ آپ قلعہ کوئٹہ میں کوری کولسی تاریخ کو ہونے والے قریبی قریب میں
12/2017 280-35-42-41-21
GNDST No 280-35-42-41-21

5۔ کوئٹہ میں کولسی لوڈنگ کی جگہ کی تصویر کب لی گئی تھی۔ PST

6۔ کوئٹہ میں PST لوڈنگ سے کس لوڈنگ سے ترقی ہوئی آرڈر نمبر کیا ہے

PST سے DM کی تصویر 2-12-2017 GNDST No 628-42-27-21-21

7۔ قلعہ ایف آئی اے میں کولسی تاریخ کو ڈالنے والے آرڈر نمبر کیا ہے
12/2017 280-42-41-21-21
GNDST No 2238-42-41-21-21

8۔ کوئٹہ میں سسرولس برائے آرڈر ایف آئی اے کی تصویر کب لی گئی تھی
کس سے

کوئٹہ میں سسرولس برائے آرڈر ایف آئی اے کی تصویر کب لی گئی تھی

9۔ آپ ایف آئی اے میں DM کی تصویر کب لی گئی تھی اور کس سے
10 GML ایف آئی اے میں DM کی تصویر کب لی گئی تھی اور کس سے

ایف آئی اے میں DM کی تصویر کب لی گئی تھی اور کس سے

10۔ تاریخ کے متعلقہ حکم سسرولس سے آرڈر کیا گیا ہے اور کس سے
11۔ تاریخ کے متعلقہ حکم سسرولس سے آرڈر کیا گیا ہے اور کس سے

12۔ تاریخ کے متعلقہ حکم سسرولس سے آرڈر کیا گیا ہے اور کس سے

13۔ تاریخ کے متعلقہ حکم سسرولس سے آرڈر کیا گیا ہے اور کس سے

14۔ تاریخ کے متعلقہ حکم سسرولس سے آرڈر کیا گیا ہے اور کس سے

15۔ تاریخ کے متعلقہ حکم سسرولس سے آرڈر کیا گیا ہے اور کس سے

16۔ تاریخ کے متعلقہ حکم سسرولس سے آرڈر کیا گیا ہے اور کس سے

Fazal
2/2020

Attested
Signature

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OFFICE OF THE PRINCIPAL GOVT GIRLS COMP HIGHER SECY SCHOOL ABBOTTABAD.

No. 504

Dated 08/06/2020

To

The District Education Officer (F)
Abbottabad.

Subject:

INQUIRY REGARDING VERIFICATION OF SERVICE RECORD/
APPOINTMENT IN R/O MST. FAIZA MUSHARAF, DM.

Memo:

With reference to your Notification issued vide Endst: No. 1581 dated 05-03-2020 on the subject cited above.

The following facts are being submitted.

1. Mst Faiza Musharaf D/O Musharaf Hussain was appointed on 02-12-2009 in BPS-07 at GGPS Banseri vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: No.280-85 dated 02-12-2009.
2. Her cadre was changed to PTC BPS-07 to DM BPS-09 vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: No. 628-33 dated 02-12-2010 and adjusted at GGMS Jashoi.
3. She was transferred to District Abbottabad vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar order issued under Endst: No.2238-42 dated 27-07-2012.

Different enquiries were conducted by the following officers.

1. Miss Farhat Bashir, Principal B-19 GGHS No.2 Abbottabad & Mr.Abdur Rashid, V.principal GHSS Nawanshehr ATD.
2. Mr.Riaz Swati, District Education Officer (F) TorGhar.
3. Mr.Shehzad, Principal GHS Shenkri District mansehra.

SERVICE RECORD / APPOINTMENT ORDER.

Now it is being directed to conduct enquiry regarding verification of Service record/ Appointment order in r/o Mst Faiza Musharaf.

It is submitted that a paneled enquiry should be conducted under the supervision of the most senior hierarchy as no record was found in this regard to verify.

EB-II
1/12

Principal
V.Principal

Attest
Pri

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Amir M^u (Signature)

The Director
Ed S.E. Khyber Pakhtunkhwa
Peshawar.

Subject - Appeal

Reference - D.E.O (F) Abbottabad memo NO. 245/EB-11
dated 18.01.2016

Respected sir,

I have the honour to submit
my appeal for re-adjustment as D.M.
at a vacant post in Dist. Mausebra and
request your kind honour to consider
my case sympathetically.

Sir,

I was appointed as P.S.T Teacher in Dist.
Kohistan and then promoted/adjusted as
D.M. I have passed my D.M. Course from
R.I.T.E. Mausebra as regular student. Copy attached
I was transferred to GEMS Ali Abad
Abbottabad district by your honour vide Order
no 2233-42 dated 27/7/2012.

I attended the school GEMS Ali Abad
(ATD) but the incharge did not hand over
charge of the post. However pay was
with retained by DEO office.

Attested
(Signature)

975
21-11-17

ended show cause notice and reply was submitted
in course of time. (Copies attached)

I myself appeared before DEO(F) for
several times for adjustment but in vain.

I have recovered the amount in cash
to Govt treasury and ready to recover the
remaining amount in instalments after
adjustment.

In the last paragraph of DEO(F) ATD memo
quoted above she suggested my adjustment
either than Abbottabad district.

I appeal your kind favour
to adjust myself at a V post in district
Manselma as I am domiciled of Manselma.

I shall be thankful to you please.

Your most obedient Servant
Faiza

FAIZA MUSHARAF
D.M.

to Ms Ali Aba
Abbottabad.
Faiza

Encl:-

1. Adjustment order as D.M/D.M.C of
D.M. course.
2. Transfer order.
3. Pay statement of DAD Kohistan
4. Bank statement of MEB ATD.
5. DEO(F) ATD memo no. 265 dt. 18-1-16.
6. Copy of S. Book.

Attested
[Signature]

47

Amme N^o 7

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

No. 3361 /F.No.362/(F)/Appeal A.abad

Dated Peshawar the 15/12/2017

To

The District Education Officer,
(Female) Abbottabad

Subject:- APPEAL

I am directed to refer to the subject cited above and to enclose herewith a copy of appeal, in respect of Mst. Faiza Musharaf DM. GGMS, Ali Abad, District Abbottabad and to ask you to submit detail report comments to this directorate for further process.

[Signature]
Assistant Director - II
(E&SE) Khyber Pakhtunkhwa
13/12/17

EPB-II
4212/19
21/12/17



Admitted
Eini

48

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 245 / EB-II

Dated: 18 / 01/2016



0992-342533, 0992-342314

deofemale_abbottabad@yahoo.com

To

The Director
E&SE Khyber Pakhtunkhwa.
Peshawar.

SUBJECT: DISS MISSEL OF Mst:FAIZA MUSHRAF PST/DM GGMS SOYAL JASWAI KOHISTAN UNDER TRANSFER TO GGMS ALI ABAD, ABBOTTABAD.

Memo:

Please read with:-

- i. Enquiry Report Conducted by enquiry Committee attached as Annexure-----A
- ii. Copy of service book of Mst: Faiza Musharaf.....Annexure-----B
- iii. Transfer order Endst.No.2238-42 issued on 27-07-2012
Signed by/verified by Deputy Director (Estb) Khyber Pakhtunkhwa
Peshawar..... Annexure-----C

It is submitted that:-

1. Mst: Faiza Musharaf resident of Bhairkund District Mansehra she relative of Mukhtiar Khan Ex-E.D.O Kohistan.
2. She was appointed as PST (Untrained) at GGPS Bansari District Kohistan On 03/12/2009.
3. Her cadre was changed from PST to DM (BPS-7 to 09) both the order were Passed by Mukhtiar Khan Ex-E.D.O. Kohistan, as appeared page-07 of service book.
4. She was transferred to GGMS Ali Abad on 07-07-2012 by Dy: Director (Estb) E&SE Peshawar.
5. She did not resume her charge at GGMS Ali Abad up till now but has Succeeded to draw Salary Rs.4, 99,147/-(Four Lac Ninety Nine thousand & one hundred & forty seven) with mal practice and involvement of Mst: Abida Shaheen, Ex-DDO (F) Abbottabad and Clerk Mr. Muhammad Shafiq, Ex-Accountant who has already been compulsory retired, detail can be read in findings of Enquiry report attached as Annexure-----A. above
6. She is willing to refund the drawn amount if her services are restored
Annexure-----D
7. Mst:Faiza Musharaf, DM has never performed duty in District Abbottabad and is absent after transfer from District Kohistan.
8. This office is not in position to take any decision about her future as she has not properly taken over charge at District Abbottabad.
9. She has refunded Rs. One lac through challan No.1292 DATED 08/06/2015 and she is also willing to refund remaining drawn amount.

On the basis of above facts, the case is submitted before your good self with the remarks that case be settled at your office or D.E.O (F) Kohistan as she cannot be given charge at GGMS Ali Abad District Abbottabad after elapse of more than 03 years.

Keeping in view the position explained above the services of above accused

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OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR

276

NOTIFICATION.

Mr, Riaz Swati District Education Officer (F) TorGhar is hereby appointed as enquiry officer to probe into the matter as per attached letter No. 083 dated 04-01-2018.

The inquiry officer should submit detail inquiry report along with clear findings and recommendations within 15 days positively to this Directorate for further necessary action please.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 247279 /F.No.362/(F)/Appeal A.abad Dated Peshawar the 15/02/2018

Copy forwarded to the:-

1. Mr, Riaz Swati District Education Officer (F) Tor Ghar.
2. District Education Officer (F) Abbottabad with the remarks to assist and provide the relevant record to the Inquiry Officer concerned.
3. PA to Director E&SE Peshawar.
4. M.File

[Signature]
12/02/18
Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa.
12/02/18

Abtsted
[Signature]

SA Ahmed P³

OFFICE OF THE DIRECTOR, ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR

177
V

NOTIFICATION

Mr. Shehzad Principal GHS Shenkri, District Manshera is hereby
appointed as inquiry officer to conduct inquiry as per attached letter No. 1126-78 dated
10/03/2018 of the DEO (F) Loralai

The inquiry officer should submit detail inquiry report along with clear
findings and recommendations within 15 days positively to this Directorate for further
necessary action please

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Order No. 1467-9 /F.No.362/(F)Appeal Abbottabad. Dated Peshawar the 10/04 2018

Copy forwarded to the:-

- Shehzad Principal GHS Shenkri, District Manshera.
- District Education Officer (F) Abbottabad with the remarks to assist and provide
the relevant record to the Inquiry Officer concerned
- to Director E&SE Peshawar.

Deputy Director, Elementary & Secondary Education
(E&SE) Khyber Pakhtunkhwa

Attested
[Signature]

Annex 2

(57)

از طرف ڈسٹرکٹ ایجوکیشن آفیسر (زمانہ) ضلع ایبٹ آباد

تاریخ: 8/8/18

بن: 6236

بنام انکوائری آفیسر بسپل ڈی ایچ سڈکھاری، حائسہ

(57)

عنوان: جواب نامہ بحوالہ انکوائری خانہ مشرف (ڈی ایم)

بخانہ: مذکورہ ٹیچر گورنمنٹ گریڈ سکول علی آباد میں کبھی

گئی ہیں نہیں

بخانہ: مذکورہ ٹیچر کی تنخواہیں اس وقت کے اکاؤنٹ میں شفیق

نے بل کے ذریعے خزانے سے نکوائی

بخانہ: خزانے سے تنخواہ 01/09/2012 سے 31/12/2014 تک نکوائی گئی

بخانہ: افسرانِ مال سے حقائق چھبانے اور غیر قانونی طور پر تنخواہ

جاری کرنے کے فرم میں سابقہ ڈی ای او مسماۃ عابدہ شاہین

کو نوٹری سے جبری ریٹائر کیا گیا

Ms. Fatima

ڈسٹرکٹ ایجوکیشن آفیسر
(زمانہ) ضلع ایبٹ آباد

District Education Officer
(Female) Abbottabad

Attested

Signature

52

1

سوالنامہ برائے DEO صاحبہ ایبٹ آباد بحوالہ انکوائری فائرہ مشرف DM

1- فائرہ مشرف DM کی تبدیلی ضلع کوہستان سے GGMS ALI ABAD بمطابق آرڈر نمبر 2238-42 بتاریخ 27-07-2012 مجاز اتھارٹی سے جاری ہوا مذکورہ سکول میں متعلقہ ٹیچر کو چارج نہ دینے کی وجوہات کیا تھیں

2- مذکورہ ٹیچر کی چارج رپورٹ کی عدم موجودگی میں اور بغیر چارج لیے تنخواہ کس طرح خزانے سے نکالی گئی۔

3- خزانے سے تنخواہ کتنے عرصے تک نکلتی رہی

4- اس عرصہ کے دوران تنخواہ جاری رہنے کے باوجود افسران بالا کو اطلاع کیوں نہیں دی گئی اور بروقت اس مسئلے کا تدارک کیوں نہیں کیا گیا نیز اس ضمن میں کیا کارروائی عمل میں لائی گئی۔

انکوائری افسیر
پرنسپل GHS شنگھاری مانسہرہ
Principal
G.H.S Shinkhari
Manshra

Allsteel
Eun

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Amir R. 21

OFFICE OF THE PRINCIPAL GHS SHINKIARI MANSEHRA

mail ghsshinkari@gmail.com

Phone 0997-530154

Mob 03009119058

No. 2863

Dated 4/9/2018

To

The Director (E&SE)
Khyber Pakhtunkhwa Peshawar

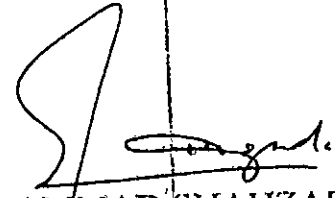
Subject:-

Enquiry report in respect of Mrs Faiza Musharaf DM
under transfer from GGMS Soyai Jashoi to GGMS Aliabad

Memo,

It is submitted that in the light of notification issued under Endstt No 1907-9 dated 10-04-2018. Wherein I have been appointed as inquiry officer on the appeal of Mrs. Faiza Musharaf DM under transfer from GGMS Soyai Jashoi District Kohistan to GGMS Aliabad District Abbottabad.

In accordance with the said notification I have conducted the detail enquiry of the case and report thereof is enclosed herewith for further n/a please.



MUIAMMAD SHAHZAD

Principal
GHS Shinkari Manshra.
(Enquiry officer)

Admitted
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ENQUIRY REPORT

~~(X)~~ (86)

CAPTION OF ENQUIRY	The Director (E&SE) Khyber Pakhtunkhwa Peshawar
ENQUIRY COMMITTEE	Muhammad Shahzad Principal GHS Shinkhari District Mansehra.
PLACE OF INQUIRY	Office of the District Education Officer (Female) Abbottabad
DATE OF INQUIRY	22-04-2018 onward

BRIEF HISTORY OF THE CASE

Mrs. Faiza Musharaf DM has been transferred from GGMS Soyal Jasawi District Kohistan to GGMS Aliabad District Abbottabad vide Director (E&SE) Khyber Pakhtunkhwa office order No 2238-42 dated 27-07-2012.

She reported her arrival at GGMS Aliabad on 02-08-2012 and reported to have not been handed over the charge by the incharge of the school as reported by the DEO (Female) Abbottabad her pay has been drawn from the treasury for the period from 01-09-2012 to 31-12-2014.

REFERENCES / TORS

- To probe and inquire the facts with reference to DEO (Female)
- Fotghar letter No No.4176-78 dated 02-03-2018 regarding dismissal of accused teacher.
- To probe the facts of the case about none handing over of charge and draw of salary without performing the duty by the teacher concerned.

PROCEEDURE

- Questionnaires were served to the DEO (F) Abbottabad and teacher concerned.
- Scrutiny of the record.
- Personal hearing

STATEMET OF DEO (F) ABBOTTABAD

Attested:
[Signature]

- (35)
- (A)
- (84)
- The accused teacher transferred from District Kohistan to GGMS Aliabad District Abbottabad but she never went to her school.
 - The pay of said teacher was drawn from government treasury at that time through manual bills by the then accountant of this office whose name is Mr. Shafique
 - The pay of the said teacher was drawn for the period from 01-09-2012 to 31-12-2014.
 - In order to hide the facts and figures from the higher authorities and also illegally drawl of salary of accused teacher Mrs. Abida shaheen Ix-DDO (F) was punished by imposing major penalty i.e compulsory retirement from the service.

STATEMENT OF FAIZA MUSIARAF THE TEACHER CONCERNED.

- She said that the transfer order and charge report submitted to DEO (F) Abbottabad and then applied for the maternity leave after the medical fitness when I reported to take charge I was not given the charge on the basis of late reporting the duty, while I have submitted my arrival report well in time and then submitted leave application which certificate for maternity leave.
- I have requested many times to the higher authorities for my adjustment but no action has been taken so far .
- It is evident by the submission of transfer order, Charge reports, LPC and service book in the DEO (F) office Abbottabad my pay was drawn.
- After expiry of leave I again reported my arrival at DEO (F) Abbottabad as well as GGMS Aliabad , but I have not been handed over charge due to reason for late submission of arrival report.
- She has submitted an appeal to the Director (E&SE) Education Khyber Pakhtunkhwa for adjustment, but till now I have not been adjusted.
- According to the reply of teacher she has received and amount of Rs- 381660/ through bank account.
- Out of the above amount Rs.100000/ has been deposited in the treasury vide chalan No; 4392 dated 08-06-2015 NBP Main Branch Abbottabad .
- He also willing to deposit the remaining amount after adjustment through monthly salary.

DETAIL OF FACTS FINDING

Attested
by

(56)

- I have not found any notification regarding dismissal of the accused teacher in the record provided by DEO (F) Abbottabad as reported in the letter No 4176-78 dated 02-03-2018 by DEO (F) Torghar
- The teacher concerned was transferred from District Kohistan on 02-08-2012
- It is observed that she did not take over charge as DM at GGMS Aliabad .
- It is found that she did not submitted her arrival report or charge report of GGMS Aliabad to DEO (F) office Abbottabad.
- The salary has been drawn illegally without performing the duties.
- The teacher herself admitted the facts and refunded an amount of Rs.100000 vide chalan No.4392 dated 08-06-2015 A/C No 2814 NBP main Brach Abbottabad.
- The teacher is still surplus and has not been adjusted
- An amount of Rs.399147/- is still required to be recovered.
- From the record it is observed that she presented herself for recovery of pay and she appealed for adjustment.
- In the earlier Inquiry made By DEO (F) Abbottabad No 245 dated 18-01-2016. She recommended for further adjustment other than district Abbottabad.

RECOMMENDATION

Keeping in view the above facts it is suggested and recommended that.

- The remaining amount received by the teacher must be recovered from the teacher which has been paid by the DEO (F) Abbottabad without performing the duties.
- As already recommended by the DEO(F) Abbottabad vide order NO 245 dated 18-01-2016 the teacher concern may be adjusted against any DM post in district Manshra as she domiciled this District, however an affidavit may be obtained from the teacher concern regarding recovery of remaining amount before her adjustment.
- The intervening period may be treated as leave without pay as she has not performed duties and remained unadjusted.

MUHAMMAD SHAHZAD
Principal
GHS Shinkhari Mansehra
(Inquiry officer)

Email ghsshinkhari@gmail.com
Phone 0997-530154
Cell# 03009119058

Abdul
Bin



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Arman T.



**DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA**

@ deofmansehra@yahoo.com

(+92) 0997-300926

Dated: 14/9/2019

5758 /AE-I

The Director
Elementary and Secondary Education
Khyber Pakhtunkhawa Peshawar.

P-1022-A

Subject:- INQUIRY REPORT IN RESPECT OF MST.FAIZA MUSHARAF DM UNDER
TRANSFER FROM GGMS SOUAL JASHOI KOHISTAN TO GGMS ALI ABAD
ABBOTTABAD

Memo,
Reference to the subject cited above in connection with your letter No 1284/F.No.362 (F)/Appeal Abbottabad dated 17/09/2018, it is brought in to your kind notice that Mst: Faiza Musharaf D.M GGMS Ali Abad (Abbottabad) was initially appointed in District Kohistan and later on transferred to District Abbottabad against D.M post. It is submitted that she was neither appointed nor transferred to District Mansehra. However; the inquiry officer recommended her adjustment at District Mansehra. Your good self is requested to guide this office whether to adjust the teacher concerned at District Mansehra after obtaining comments from District Education Officer (Female) Abbottabad or your office may direct DEO (F) Abbottabad to adjust her there because the case falls in the ambit of DEO (F) Abbottabad.

[Signature]
14/9/19
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

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18-3-19

Attested
[Signature]

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Amee U

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Pesh:

No. 1284 /F.No.362/(F)/Appeal Abbottabad

Dated Peshawar the 17/4/2018

To

The District Education Officer,
(Female) Abbottabad

Subject:- INQUIRY REPORT IN RESPECT OF MST.FAIZA MUSHARAF DM UNDER TRANSFER FROM GGMS SOUAL JASHOI KOHISTAN TO GGMS ALIABAD ABBOTTABAD.

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiry report carried out by Muhammad Shahzad Principal GHS Shinkiari Mansehra in respect of Mst. Faiza Musharaf DM GGMS Ali Abad Abbottabad and to ask you to implement the recommendations of enquiry officer for adjustment against any DM post.

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,

Endst: No. _____ Copy forwarded your information to the:-

- 1. PA to Director (E&SE) Khyber Pakhtunkhwa local Directorate.

17/9/18

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,

Being EBIT
write letter to
Director for guidance
in the light of inquiry report
24/9/2018

Obstaid
in

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 8496 /EB-II

Dated A/Abad the 1/12 /2018,

To,

The Director,
Elementary and Secy: Education,
Khyber Pakhtun Khawa Peshawar.

SUBJECT:-

ENQUIRY REPORT I.R.O MST: FAIZA MUSHARAF DM UNDER TRANSFER
FROM GGMS SOUAL JASHOI KOHISTAN TO GGMS ALI ABAQD ABBOTTABAD.

Memo.

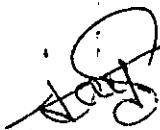
1. Please read with letter No.245/EB-II Dated Abbottabad the 18.01.2016.
2. Recommendation of the enquiry report by Mr, Shahzad Principal Government High School Shinkiari Mansehra.
3. Letter No.1284/F.No.363/(F) Appeal Abbottabad dated Peshawar the 17.09.218 by the Directorate of Elementary and secondary Education Khyber Pakhtunkhawa Peshawar.

It is submitted that in recommendation of No.2 of the enquiry office has sighted that District Education Officer (female) Abbottabad office order No.245 /EB-II dated Abbottabad the 18.01.2016, there is no recommendation of adjustment of the said teacher at District Mansehra in the said letter. Where as many important points in the said letter ^{are} as under:-

1. Point 2,3,4,5,6, and 7 has been raised.

In the presence of these objections the District Education Officer (Female) Abbottabad has suggested that the case be settled at District Education Officer (Female) Kohistan Office.

Hence it is requested once again that there is nothing to implement in District Abbottabad in the case in hand.


DISTRICT EDUCATION OFFICER,
(FEMALE) ABBOTTABAD.

Assisted
Sri

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



NO. _____

Dated: _____/2019

To,

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject:

**INQUIRY REPORT IN RESPECT OF MST. FAIZA MUSHARAF DM UNDER
TRANSFER FROM GGMS JASHOI KOHISTAN TO GGMS ALI ABAD ABBOTTABAD**

Memo:

Reference to letter No. 2819/F.No. 362/F/Appeal/Vol-1/Abbottabad regarding subject, it is brought into the notice of your goodself that;

- Mst. Faiza Musharaf has been appointed as PST (untrained) at GGPS Bansari District Kohistan on 03/12/2009.
- Her cadre was changed from PST, BPS-7 to DM, BPS-9 (Annex-A)
- She was transferred to GGMS Ali Abad on 07/07/2012 by Deputy Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
- She did not resume her charge at GGMS Ali Abad but succeeded to draw salary Rupees. 497,147/- 1-9-2012 to 30-11-2014
- Mst. Faiza Musharaf, DM has never performed duty in District Abbottabad and all the time remained absent after transfer from District Kohistan.
- She has refunded Rs. 100,000/- through challan and remaining amount is still waited to be refund.
- On the basis of above mentioned facts the case was forwarded to Director (E&SE) Khyber Pakhtunkhwa, Peshawar for settlement as she has never taken over charge at GGMS Ali Abad District Abbottabad.
- On the appeal of the said mistress Mr. Shahzad, Principal GHS Shankiari District Mansehra was nominated as Inquiry Officer dated 02/03/2018. (Annex-B)
- Mr. Shahzad submitted Inquiry Report on 10/04/2018. In addition to this Director (E&SE) Khyber Pakhtunkhwa, Peshawar forwarded letter No. 1284/F.No.362/F/Appeal/Abbottabad dated Peshawar 17/09/2018, directed to implement the recommendation on Inquiry Officer in which it was recommended that the teacher concerned may be adjusted against any DM post in District Mansehra as she has domicile of District Mansehra. (Annex-C)
- In the light of above mentioned facts, District Education Officer (Female) Abbottabad has suggested that the case may please be settled at District Education Officer (Female) Kohistan office as she has never remained on the strength of District Education Officer (Female) Abbottabad. (Annex-D)
- On the other hand, Director (E&SE) Khyber Pakhtunkhwa, Peshawar directed District Education Officer (Female) Mansehra to adjust the said teacher but District Education Officer (Female) Mansehra refused to do so. (Annex-E)
- So the matter is submitted for your kind consideration and further decision please.

(C) DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Endst: No. 3724-28, Dated 2/5/2019

Copy to the:

1. PA to Director, E&SE Khyber Pakhtunkhwa, Peshawar.

(C) DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Attested
[Signature]



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

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Amman "y"

No. 12/67 /F.No.362/F/Abbottabad

Dated Peshawar the 17/10/2019

To

The District Education Officer,
(Female) **Abbottabad**

Subject: **INQUIRY IN R/O MST FAIZA MUSHARAF DM**

I am directed to refer to your letter No.3724-25 dated 02-05-2019 on the subject cited above and to ask you to attend this office on 29-10-2019 at 9:00 AM alongwith complete official record and supporting documents.

1. Charge report.
2. Arrival report GGMS Ali Abad.
3. Salary status.

Haid
Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,

Endst: No. _____

Copy forwarded your information to the:-

1. PA to Directorate of (E&SE) Khyber Pakhtunkhwa, Peshawar

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,

DIA
prepare file for meeting
21/10/19

Abbottabad
Am

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Announced 2/11
~~_____~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No: 9036 /EB-II/PF Faiza
Dated: 26/10 /2019.


To,
B&AO
DEO(F)Office
Abbottabad

SUBJECT: PROVISION OF RECORD
Memo,

Reference to Letter No:1289/F No.362/F Abbottabad Dated Peshawar
17-10-2009 (Copy attached for ready reference).

You are directed to submit relevant record today before closing of
business hours.

The matter may be treated as most urgent.


District Education Officer
Female Abbottabad

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Musharraf er AA

[Signature]



Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar

Notification

Whereas, Mst. Faiza Musharraf appealed against her disposal at the Directorate by the DEO (F) Abbottabad vide her report No.245/EB-II dated 18/01/2016.

And whereas, an inquiry was conducted through Mr. Muhammad Shahzad Principal GHS Shinkhari District Mansehra vide No.1907-9/F.No.362/(F)/Appeal A.abad dated Peshawar the 10/4/2018 who submitted his report vide No.2363 dated 04/9/2018 recommending her adjustment, recovery of the salaries she received without performing her duty and conversion of the intervening period into leave without pay.

And whereas, the appellant along with the DEO (F) Abbottabad and DEO (F) Dausu (Upper) Kohistan were called for formal hearing of their respective point of view and presentation of related official record on 29/10/2019 which they all duly attended.

And whereas, the Hearing Committee heard the point of view of Mst. Faiza Musharraf.

And whereas, during the proceeding of the hearing the DEO (F) Abbottabad doubted the appointment of Mst. Faiza Musharraf as PST and her cadre change from PST to DM by the EDO Kohistan and further informed that upon her inter-district transfer to Abbottabad, she did not report for duty but regularly received her salaries without performing duty with the connivance of some officials in the DEO (F) office from 01/9/2012 to 30/11/2014.

And whereas, the DEO (F) Dausu (Upper) Kohistan regretted provision of the official record pertaining to the case as the same was claimed to be non-available/non-existing in his office and also doubted the genuineness of her appointment as PST and change of cadre to DM.

And whereas, the Appellate Authority after having considered the appeal of Faiza Musharraf, the inquiry report, the reports and point of views of the DEOs (F) Abbottabad and Dausu (Upper) Kohistan is of the view that the case may be remanded back to the DEO (F) Abbottabad for proper fact-finding inquiry being the competent authority.

Now, therefore, the Appellate Authority the Director Elementary and Secondary Education Khyber Pakhtunkhwa places Mst. Faiza Musharraf back at the disposal of the DEO (F) Abbottabad with the following further directions:

- a. The authenticity as to the genuineness of the service record, her appointment as PST and then change of cadre to DM may be verified and determined from the DEO (F) Dausu (Upper) Kohistan through a formal inquiry and proceed accordingly.

[Handwritten notes and signatures]
11/12/19

Attsted
[Signature]

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- b. If proved bogus she may be reported to law-enforcing agencies and all the salaries drawn fraudulently be recovered from her.
- c. If proved genuine then she may be proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for non-reporting/non-performance of duty while regularly and fraudulently drawing salaries from 01/9/2012 to 30/11/2014.
- d. Compliance/implementation/progress report may be submitted to the undersigned during the whole course of the proceeding of the instant case. +

Director
(Appellate Authority)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 512-2-25 /F.No.362/(F)Appeal A abad Dated Peshawar the 17-12-2019

Copy forwarded for information and necessary action to the: -

- 1. District Education Office (F) Abbottabad.
- 2. District Education Officer (F) Dassu (Upper) Kohistan for extending full cooperation to DEO (F) Abbottabad in the inquiry against Mst. Faiza Musharraf d/o Musharraf Hussain resident of District Mansehra.
- 3. Teacher concerned.
- 4. P.A. to Director E&SE Khyber Pakhtunkhwa.
- 5. Master File.

H. W. M.
Deputy Director (F/Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Attested
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(Signature)



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

No. 4511-42 /F.No 362/Vol-1/F/Appeal/Abbottabad

Dated Peshawar the 1/09/2021

To

1. The District Education Officer,
(Female) **Abbottabad**
2. The District Education Officer,
(Female) **Mansehra**

Subject:- **APPEAL FOR REINSTATEMENT.**

I am directed to refer to the subject cited above and to enclose herewith a copy of appeal in respect of Mst. Faiza Musharaf Ex-DM, GGHS Ali Abad District Abbottabad and to ask you to submit detail report comments/views to this Directorate to proceed further into the matter.

(Signature) 31/8/2021

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

Endst No. _____

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

3490
19/9/2021

EB-II
Put up detail report case was
9/9/2021

Abbottabad
(Signature)

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Amir CC
42

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 10000 / Dated: 3/11/2021

0992-342533, 0992-342314

Deofemale_abbottabad@gmail.com

To The Director,
Elementary & Secondary Education,
KPK, Peshawar.

Subject: **APPEAL FOR REINSTATEMENT**

Memo,

Reference letter No. 4541-42/F.NO 362/Vol-1/F/Appeal/Abbottabad dated 01-09-2021, it is stated that Mst: Faiza Mushraf D/O Musharaf Hussain was appointed on 02-12-2009 in BPS-07 at GGPS Banseri vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: No. 280-85 dated 02-12-2009, later on her cadre was changed from PTC BPS-07 to DM vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: NO. 628-33 dated 02-12-2010 and adjusted at GGMS Jashoi.

That, she was transferred to District Abbottabad vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar order issued under Endst: No. 2238-42 dated 27-07-2012, but unfortunately failed to take charge at GGMS Ali Abad/ or resumed duty there.

That, the said Teacher has drawn a huge amount Rs: 499147/- for the period of 01-09-2012 to 30-11-2014, without performing duty against her post, she confessed that in her previous statements (copy attached) and also during personal hearing in the office of undersigned under no. 4291 dated 06-07-2020,

That, amount of Rs: 100000/- deposited vide DDO code 7045, CO 2814 R/O/P NBP main branch Atd Receipt no.4392 dated 08-06-2015, while an amount of Rs: 399147/- still pending on her part that need to be deposited immediately.

That, inquiry conducted by Mr. Abdul Rasheed V-Principal GHSS Nawansher and Ms. Farhat Bashir GGHS No. 2 Abbottabad. Vide No.05-8 dated 01-01-2015, given below allegation against the said teachers head been proved.

- Willful absence from duty/not resumption of charge of the post properly.
- Drawl of pay from Govt: Treasury for not being at the strength of DEO (F) Abbottabad.

Therefore, her case for dismissed from service was sent to Director E&SE KPK vide No.245/EB-II dated 18-01-2016.

That, another inquiry was conducted vide No. 1907-9/F.No.362/(F)/appeal Abbottabad dated 10-04-2018, by Mr. Muhammad Shahzad Principal GHSShinkhari Mansehra, inquiry officer submitted inquiry report with the recommendation that the Teacher concerned may be adjusted against any DM post in District Mansehra as she has domicile of District Mansehra, remaining amount Rs: 399147/- must be recovered from said teacher which has been paid her without performing the duties.

That, she filed her appeal to director E&SE, in response to her appeal she were called for personal hearing along with undersigned and DEO (F) Dassu (Upper) Kohistan vide No.

*Abdullah
Ali*

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1289/F.NO. 362/F/Abbottabad Dated: 17-10-2019, at Directorate of E&SE KPK Peshawar.

That, the appellate Authority the Director E&SE placed Mst. Faiza Musharaf back at the Disposal of DEO (F) Abbottabad with the following further direction vide No. 5122-25/F.No. 362 dated; 12-12-2019.

- a. The authenticity as to the genuineness of the service record, her appointment as PST and then change of cadre to DM may be verified and determined from the DEO (F) Dassu (Upper) Kohistan through a formal inquiry and process accordingly.
- b. If proved bogus she may be reported to law-enforcing agencies and all the salaries drawn fraudulently be recovered from her.
- c. If proved genuine then she may be proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules 20111, for non-reporting/non-performance of duty while regularly and fraudulently drawing salaries from 01-09-2012 to 30-11-2014.

That, District Education officer (F) Kohistan submitted report vide No. 6486/DEO (F) KH-4 dated: 08-02-2020, that no record be traced in r/o said teacher, and office is unable to verify the service/cadre change record of Mst. Faiza Musharaf from PST to DM.

That, Mst. Khoula Javed V.Principal GGCHSS Abbottabad was nominated as inquiry officer vide this office No. 1581 dated 05-03-2020, she submitted her inquiry report with the recommendation that on inquiry regarding verification of service record/ appointment order in r/o Mst. Faiza Musharaf should be conducted as no record was found in this record to verify.

That, Mst. Faiza Musharaf was also called No. 4153/EB-II dated 30-06-2020, but she failed to satisfy the undersigned.

That, After going through her case thoroughly and considering the fact, that Mst: Faiza Mushraf has never been on strength of District Abbottabad and fraudulently drawn a huge amount on accord of salary__ thus lost her credibility__ so this office seems least interested in her adjustment at District Abbottabad, her order is thus infructuous and maybe considered as null and void.

Report is submitted as desired please.

Endst No: 10001-2 dated: 3/11 /2021

07/11/2021
District Education Officer
(Female) Abbottabad

Copy of the above is forwarded to:

- 1. Assistant Director (Female), Elementary & Secondary Education KPK Peshawar vide reference No. 4541-42/F.NO 362/Vol-1/F/Appeal/Abbottabad dated 01-09-2021.
- 2. Official File.

11/11/2021
District Education Officer
(Female) Abbottabad

03/11/2021

*Attested
Sir*



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

~~68~~

Number "dd"
68

No. 6739 /F.No 362/Vol-I/F/appeal/Abbottabad

Dated Peshawar the 17/12 /2021

To

The District Education Officer,
(Female) Abbottabad

Subject:- APPEAL FOR REINSTATEMENT.

Memo:

I am directed to refer to your letter No. 10000 dated 3.11.2021 on the subject cited above and to ask you to proceed against the teacher concerned under the rules/policy and strick action may also be taken against her.

[Signature]
10/12/2021
Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

Endst No. _____

Copy of the above is forwarded to the:

- 1. PA to Director E&SE KPK Peshawar.

Fauzia Muehanif

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

EB-II
bana/plz
Jale
31/12/2021

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31/12/21

Abbottabad
[Signature]

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Amended "ee"
(4/6)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 1854 /EB-II/Faiza Musharaf Dated Abbottabad the 24 /02/2022

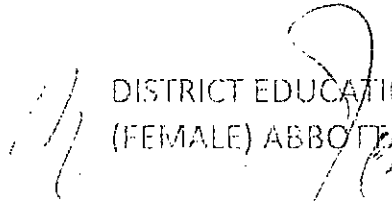
To,

The District Education Officer
(Female) Kohistan Kolai Palas.

SUBJECT:- APPEAL FOR REINSTATEMENT

Memo:

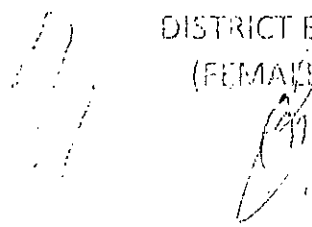
Reference Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar letter No.2788/F.No.322/F/Appeal Kohistan Kolai Palas dated 07.02.2022 on the subject cited above and to state that the case of Mst: Faiza Musharaf, appointed on 02.12.2009 as PTC (BPS-07) at GGPS Banseri District Kohistan is forwarded to you with the request to implement the direction given in above quoted letter No. that " to disown her order with abolition under intimation to competent authority.

 DISTRICT EDUCATION OFFICER,
(FEMALE) ABBOTTABAD.

Enclst:No. 1855 /EB-II/Faiza Musharaf DM Dated Abbottabad the 24 /02/2022

Copy to the:-

1. Assistant Director(Female) E & SE Khyber Pakhtunkhwa Peshawar w/r No. 2788/F.No.322/F/Appeal Kohistan Kolai Palas dated 07.02/2022 for information and further necessary action please.

 DISTRICT EDUCATION OFFICER,
(FEMALE) ABBOTTABAD



(S) (70)

Mushraf "ff"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



☎ 0992-342533, 0992-342314
✉ Deofemale_abbottabad@gmail.com

(Signature)

Notification:

WHEREAS, Mst: Faiza Mushraf D/O Musharaf Hussain was appointed on 02-12-2009 in BPS-07 at GGPS Banseri vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: No. 280-85 dated 02-12-2009, later on her cadre was changed from PTC BPS-07 to DM vide District Officer Elementary & Secondary Education Kohistan order issued under Endst: NO. 628-33 dated 02-12-2010 and adjusted at GGMS Jashoi.

WHEREAS, she was transferred to District Abbottabad vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar order issued under Endst: No. 2238-42 dated 27-07-2012, but unfortunately failed to take charge at GGMS Ali Abad/ or resumed duty there.

WHEREAS, the said Teacher has drawn a huge amount Rs: 499147/- for the period of 01-09-2012 to 30-11-2014, without performing duty against her post, she confessed that in her previous statements (copy attached) and also during personal hearing in the office of undersigned under no. 4291 dated 06-07-2020,

WHEREAS, amount of Rs: 100000/- deposited vide DDO code 7045, CO 2814 R/O/P NBP main branch Atd Receipt no.4392 dated 08-06-2015, while an amount of Rs: 399147/- still pending on her part that need to be deposited immediately.

WHEREAS, inquiry conducted by Mr. Abdul Rasheed V-Principal GHSS Nawansher and Ms. Farhat Bashir GGHS No. 2 Abbottabad. Vide No.05-8 dated 01-01-2015, given below allegation against the said teachers head been proved.

- Willful absence from duty/not resumption of charge of the post properly.
- Drawl of pay from Govt: Treasury for not being at the strength of DEO (F) Abbottabad.

Therefore, her case for dismissed from service was sent to Director E&SE KPK vide No.245/EB-II dated 18-01-2016.

WHEREAS, another inquiry was conducted vide No. 1907-9/F.No.362/(F)/appeal Abbottabad dated 10-04-2018, by Mr. Muhammad Shahzad Principal GHS Shinkiyari Mansehra, inquiry officer submitted inquiry report with the recommendation that the Teacher concerned may be adjusted against any DM post in District Mansehra as she has domicile of District Mansehra, remaining amount Rs: 399147/- must be recovered from said teacher which has been paid her without performing the duties.

WHEREAS, she filed her appeal to director E&SE, in response to her appeal she were called for personal hearing along with undersigned and DEO (F) Dassu (Upper) Kohistan vide No. 1289/F.NO. 362/F/Abbottabad Dated: 17-10-2019, at Directorate of E&SE KPK Peshawar.

WHEREAS, the appellate Authority the Director E&SE placed Mst. Faiza Musharaf back at the Disposal of DEO (F) Abbottabad with the following further direction vide No. 5122-25/F.No. 362 dated; 12-12-2019.

- a. The authenticity as to the genuineness of the service record, her appointment as PST and then change of cadre to DM may be verified and determined from the DEO (F) Dassu (Upper) Kohistan through a formal inquiry and process accordingly.
- b. If proved bogus she may be reported to law-enforcing agencies and all the salaries drawn fraudulently be recovered from her.

Contd: P2

Attested
(Signature)

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- c. If proved genuine then she may be proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules 20111, for non-reporting/non-performance of duty while regularly and fraudulently drawing salaries from 01-09-2012 to 30-11-2014.

WHEREAS, District Education officer (F) Kohistan submitted report vide No. 6486/DEO (F) KH-4 dated: 08-02-2020, that no record be traced in r/o said teacher, and office is unable to verify the service/cadre change record of Mst. Faiza Musharaf from PST to DM.

WHEREAS, Mst. Khoula Javed V. Principal GGCHSS Abbottabad was nominated as inquiry officer vide this office No. 1581 dated 05-03-2020, she submitted her inquiry report with the recommendation that on inquiry regarding verification of service record/ appointment order in r/o Mst. Faiza Musharaf should be conducted as no record was found in this record to verify.

WHEREAS, Mst. Faiza Musharaf was also called No. 4153/EB-II dated 30-06-2020, but she failed to satisfy the undersigned.

WHEREAS, After going through her case thoroughly and considering the fact, that Mst: Faiza Mushraf has never been on strength of District Abbottabad and fraudulently drawn a huge amount on accord of salary_ thus lost her credibility_ so this office seems least interested in her adjustment at District Abbottabad, her order is thus infructuous and maybe considered as null and void.

[Signature]
District Education Officer
(Female) Abbottabad

Endst No: 5219-20 dated: 10 /08/2020

Copy of the above is forwarded to:

1. PS to Secretary, Elementary & Secondary Education KPK Peshawar.
2. PS to Director, Elementary & Secondary Education KPK Peshawar vide reference letter No. 5122-25/F.No. 362 dated; 12-12-2019.
3. Deputy Commissioner Abbottabad.
4. District Account Officer Abbottabad.
5. District Education Officer (F) Dassu (Upper) Kohistan.
6. Official Concerned.
7. Office file.

[Signature]
District Education Officer
(Female) Abbottabad

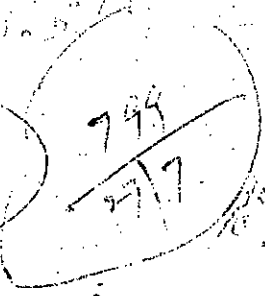
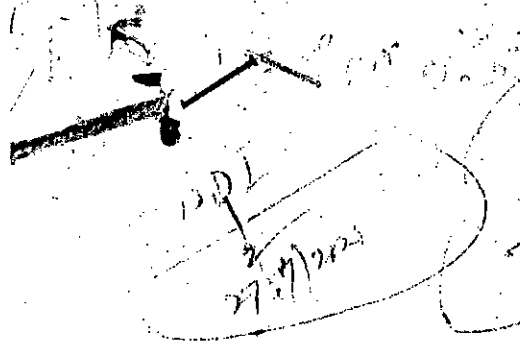
10/8/2020

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The following are the results of the experiments conducted on the effect of temperature on the rate of reaction of potassium chlorate with hydrochloric acid. The reaction is as follows:

$$KClO_3 + 6HCl \rightarrow KCl + 3H_2O + 3Cl_2$$

The rate of reaction was measured by the volume of chlorine gas evolved over a period of 10 minutes. The results are given in the table below:

Temperature (°C)	Volume of Cl_2 (ml)
10	1.2
20	2.4
30	4.8
40	9.6
50	19.2
60	38.4

From the above table, it is evident that the rate of reaction increases with an increase in temperature. This is because at a higher temperature, the molecules possess more kinetic energy and are more likely to collide with sufficient energy to overcome the activation energy barrier.

The following are the results of the experiments conducted on the effect of concentration on the rate of reaction of potassium chlorate with hydrochloric acid. The reaction is as follows:

$$KClO_3 + 6HCl \rightarrow KCl + 3H_2O + 3Cl_2$$

The rate of reaction was measured by the volume of chlorine gas evolved over a period of 10 minutes. The results are given in the table below:

Concentration (M)	Volume of Cl_2 (ml)
1.0	1.2
2.0	2.4
3.0	3.6
4.0	4.8
5.0	6.0

From the above table, it is evident that the rate of reaction increases with an increase in concentration. This is because at a higher concentration, there are more reactant molecules per unit volume, leading to a higher frequency of collisions.

The following are the results of the experiments conducted on the effect of surface area on the rate of reaction of potassium chlorate with hydrochloric acid. The reaction is as follows:

$$KClO_3 + 6HCl \rightarrow KCl + 3H_2O + 3Cl_2$$

The rate of reaction was measured by the volume of chlorine gas evolved over a period of 10 minutes. The results are given in the table below:

Surface Area (cm ²)	Volume of Cl_2 (ml)
1.0	1.2
2.0	2.4
3.0	3.6
4.0	4.8
5.0	6.0

From the above table, it is evident that the rate of reaction increases with an increase in surface area. This is because at a higher surface area, there are more reactant molecules exposed to the other reactant, leading to a higher frequency of collisions.

(P. 112)

Date: _____
 Page: _____
 Class: _____

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بخدمت جناب ڈائریکٹر صاحب ایگزیکٹو ڈی ایجوکیشن صوبہ خیبر پختونخواہ پشاور

مضمون: اپیل برائے بحالی ملازمت

جناب والا!

نہایت مسودہ بانہ گزارش ہے کہ سائلہ بطور PST ٹیچر بمطابق آرڈر نمبر 85-280 مورخہ 2-12-09 ضلع کوہستان میں بھرتی ہوئی سائلہ کو بعد ازاں DM ٹرینڈ ہونے کی وجہ سے چیئنج آف کیڈر کے آرڈر نمبر 33-628 مورخہ 2-12-09 کے ذریعے GGMS سویال جھوٹی کوہستان میں DM پوسٹ پر تعینات کیا گیا سائلہ اس دوران باقاعدگی سے ڈیوٹی کر رہی تھی اور تنخواہ وصول کرتی رہی بمطابق آرڈر نمبر 42-2238 مورخہ 27-7-12 کو آنجناب کے حکم کے مطابق GGMS علی آباد ضلع ایبٹ آباد میں ٹرانسفر کیا گیا سائلہ چارج رپورٹ LPC اور سروں بک وغیرہ جملہ کاغذات وغیرہ DEO زنانہ ایبٹ آباد میں جمع کیا اور سکول گئی بد قسمتی سے میٹرنٹی کی رخصت کی وجہ سے تین ماہ بعد سکول گئی مگر انچارج ہیڈ مسٹریس نے چارج دینے سے انکار کر دیا اس کے بعد DEO آفس کے چکر لگاتی رہی کہ کسی دوسرے سکول میں ایڈجسٹ کر دیں مگر کوئی شنوائی نہ ہوئی تاہم تنخواہ جاری کر دی گئی درخواست برائے پوسٹنگ کے جواب میں میری انکوآری شروع ہو گئی اور 15-4-28 کو شوکاژ نوٹس جاری کر دیا گیا جس کا جواب میں نے دے دیا اور حقائق سنائے DEO(F) ایبٹ آباد میں کیس بمطابق نمبر 245 مورخہ 16-1-18 ڈائریکٹر صاحب آنجناب کو مزید کارروائی کیلئے بھیج دیا اور آخری پیرا گراف میں کسی دوسرے ضلع میں تعیناتی کی سفارش کی۔

جناب عالی!

میری اپیل اور DEO(F) ایبٹ آباد کے مذکورہ لیٹر پر ڈائریکٹر صاحب نے بمطابق نوٹیفیکیشن نمبر 198 مورخہ 18-4-10 کو ایک ہائی لیول کی انکوآری کی اور گریڈ 18 کے پرنسپل GHS شکیاری مانسہرہ محمد شہزاد صاحب انکوآری آفیسر مقرر کیا گیا پرنسپل شہزاد صاحب نے تفصیلی انکوآری کی اور سائلہ کو انکوآری رپورٹ نمبر 863 مورخہ 4-9-18 کو ضلع مانسہرہ DM پوسٹ پر ایڈجسٹمنٹ کیلئے سفارش کی اور موصول شدہ تنخواہ جس میں سے ایک لاکھ روپے بقایا رقم ریکور کرنے کی سفارش کی اس انکوآری کے نتیجہ میں جناب ڈائریکٹر صاحب نے DEO(F) مانسہرہ میں تعینات کیا جائے بمطابق نمبر 1289 مورخہ 17-9-2018 کہ فائزہ مشرف DM کو مانسہرہ میں تعینات کیا جائے DEO(F) مانسہرہ نے تعمیل حکم کی بجائے کیس دوبارہ ڈائریکٹر صاحب کو

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CAENAR SHANUAD AKBAR

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بھیج دیا بحوالہ 5198 مورخہ 14-1-2019 نا انصافی اور حکم عدولی ہے اس آرڈر کو Implement کرنا چاہیے تھا مگر D.E.O(F) مانسہرہ نے نہیں کیا حالانکہ کلیئر کٹ آرڈر تھا بمطابق 5122-25 مورخہ 12-12-2019 کیس دوبارہ D.M.O(F) ایٹ آباد کے پاس آ گیا D.E.O(F) کوہستان سے سروس ریکارڈ طلب کیا جو بمطابق نمبر 5166 مورخہ 13-9-2019 کو مہیا کیا گیا اور D.M.O(F) کوہستان نے سروس ریکارڈ کی تفصیل پیش کی اور ٹرانسفر ٹوائیٹ آباد ضلع تک کا احوال لکھا انکواریوں کا لاتنامی سلسلہ چل نکلا اور مجھے بھی پرنٹل ہیئرنگ کیلئے بلایا اور میں نے صحیح صورتحال بیان کی۔ اب مورخہ 10-08-2020 کو ایک اور نوٹیفیکیشن نمبر 5219-20 مورخہ 10-08-2020 کو جاری کیا مفہوم سمجھنے سے سائلہ قاصر ہے اور آرڈر مذکورہ مجھے نہیں دیا گیا بعد میں 12-6-2021 کو دفتر سے فوٹو کاپی حاصل کی اور آپ سے اپیل ہے کہ ازراہ کرم سائلہ کو ضلع مانسہرہ DM پوسٹ پرائیڈ جسٹ کیا جائے سائلہ نے وصول شدہ تنخواہ سے ایک لاکھ روپے جمع کرادیے ہیں باقی ایڈجسٹمنٹ پر جمع کرواؤں گی غلطی کی معافی دی جائے اور میرے چھوٹے چھوٹے بچے سکولوں میں زیر تعلیم ہیں اور مالی حالات سخت خراب ہیں۔

گزارش ہے کہ شہزاد صاحب پرنسپل GHS BPS-19 شکیاری کی انکواری کی سفارشات پر عمل درآمد کرتے ہوئے آنجناب نے ضلع مانسہرہ میں ایڈجسٹمنٹ آرڈر کر دیا تھا اس آرڈر کو Implement کیا جائے۔

آپ کی عین نوازش ہوگی۔

سائلہ آپ کیلئے آپ کے بچوں کیلئے دعا گو رہے گی۔

العارض

فائزہ مشرف DM

GGMS علی آباد ایٹ آباد

CTC

(Signature)

SARDAR SHANZAD AKBAR
ADVOCATE HIGH COURT
LAHORE

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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 2788/F.No 322/F/Appeal/Kohistan Kolai Palas

Dated Peshawar the 07/07/2022

To

The District Education Officer,
(Female) Abbottabad

Subject:-

APPEAL FOR REINSTATEMENT

Memo:

I am directed to refer to your letter No.340 dated 12.1.2022 on the subject cited above and to stated that the case of Mst. Faiza Musharaf ex-DM, GGMS Ali Abad should be sent to Kohistan with the direction to disown her order with abinitio under intimation to this office.

[Handwritten signature] 7/2/22

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

Encls No. _____

Copy of the above is forwarded to the:

- 1. PA to Director E&SE KPK Peshawar.

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

EB-II
for M/A P12

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14/2/2022

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 1854 /EB-II/Faiza Musharaf Dated Abbottabad the 24 /02/2022

To,

The District Education Officer
(Female) Kohistan Kolai Palas.

SUBJECT:- APPEAL FOR REINSTATEMENT

Memo:

Reference Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar letter No.2788/F.No.322/F/Appeal Kohistan Kolai Palas dated 07.02.2022 on the subject cited above and to state that the case of Mst: Faiza Musharaf, appointed on 02.12.2009 as PTC (BPS-07) at GGPS Banseri District Kohistan is forwarded to you with the request to implement the direction given in above quoted letter No. that " to disown her order with abolition under intimation to competent authority.

DISTRICT EDUCATION OFFICER,
(FEMALE) ABBOTTABAD.

Encls.No. 1855 /EB-II/Faiza Musharaf DM Dated Abbottabad the 24 /02/2022

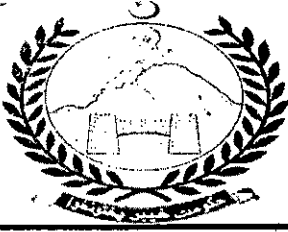
Copy to the:-

- 1. Assistant Director(Female) E & SE Khyber Pakhtunkhwa Peshawar w/r No. 2788/F.No.322/F/Appeal Kohistan Kolai Palas dated 07.02/2022 for information and further necessary action please.

DISTRICT EDUCATION OFFICER,
(FEMALE) ABBOTTABAD

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 8276 /

Dated: 16/9 /2023

0992-342533, 0992-342314

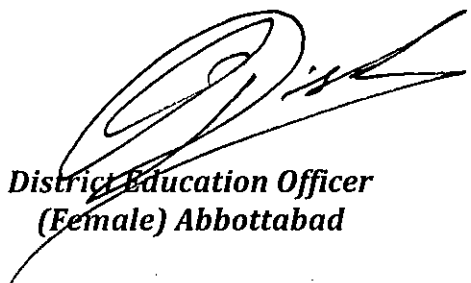
Deofemale.abbottabad@gmail.com

AUTHORITY LETTER

**SYED HAJJAJ SHAH
MRS LALA RUKH**

Memo:

Legal representatives of undr sign is hereby authorized to attend the following case title Mst: Faiza bibi vs Govt of Kpk Education department in service appeal no 7849/2023 IN HONORABLE KPK SERVICE TRIBUNAL CAMP COURT ABBOTTABAD on behalf of respondents no 1,2, 3 and 10


**District Education Officer
(Female) Abbottabad**