

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
AT CAMP COURT ABBOTTABAD

SERVICE APPEAL NO. 1243/2016

Date of institution ... 16.12.2016

Date of judgment ... 18.02.2019

Muhammad Usman S/o Khitab Muhammad (Ex-PST Teacher)
Government Primary School Darbani Torghar
Resident of Muhammaday Akazai Tehsil Kandar District Tor Ghar.

... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) District Tor Ghar.

... (Respondents)

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE IMPUGNED NOTIFICATION ENDST NO. 2898-2906
DATED 07.09.2016, WHEREBY RESPONDENT NO. 3
WITHDRAW/DENOTIFY, APPOINTMENT ORDER DATED
09.04.2016 WHICH IS ILLEGAL, AGAINST THE LAW,
AGAINST THE FACTS, NATURAL JUSTICE, AB-INITIO
VOID AND LIABLE TO BE SET-ASIDE.

Mr. Hamayun Khan, Advocate.

.. For appellant.

Mr. Muhammad Bilal Khan, Deputy District Attorney

.. For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI

.. MEMBER (JUDICIAL)

MR. AHMAD HASSAN

.. MEMBER (EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Appellant

alongwith his counsel present. Mr. Muhammad Bilal Khan, Deputy District

Attorney alongwith Mr. Fakhar Saeed, ADO for the respondents present.

Arguments heard and record perused.

2. Brief facts of the case as per present service appeal are that the appellant was serving in Education Department as Primary School Teacher. However, his appointment order was withdrawn by the competent authority vide order dated 07.09.2016 on the allegation that the domicile certificate of the appellant was forwarded to the concerned authority for verification and the same was declared fake/unverified. The appellant filed departmental appeal on 09.09.2016 which was not responded hence, the present service appeal on 16.12.2016.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

4. Learned counsel for the appellant contended that the appellant was appointed as Primary School Teacher after fulfilling of all the codal formalities.

It was further contended that the appointment order of the appellant was withdrawn by the competent authority on the aforesaid allegation but neither proper inquiry was conducted nor any show-cause notice was issued to the appellant and the appellant was condemned unheard. It was further contended that after withdrawal of appointment order of the appellant, the appellant also filed civil suit to the effect that the appellant/plaintiff is permanent resident of District Torghar and letter No. Gen (2016)DC/TG 1963 dated 30.08.2016 regarding verification of domicile of the appellant at serial No. 145 is wrong, against law and facts, ineffective upon the rights of the plaintiff and the defendant are bound to restore the domicile of the plaintiff or issue new domicile certificate to the plaintiff and the competent court also passed a decree in favour of plaintiff vide detailed judgment dated 23.01.2019 therefore, the impugned withdrawal appointment order of the appellant is illegal and liable to be set-aside.

4. On the other hand, learned Deputy District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended that

M. Amin
18.12.2019

the appellant was appointed by the competent authority vide order dated 09.04.2016. It was further contended that as per term and condition No. 5 of appointment order of the appellant, the certificate/domicile was to be verified from the concerned authority. It was further contended that the competent authority forwarded the domicile certificate of the appellant to the Deputy Commissioner Torghar for verification and after verification the same was found fake/unverified by the Deputy Commissioner Torghar therefore, the competent authority has rightly withdrawn the appointment order of the appellant on the allegation of fake/unverified domicile certificate of the appellant and prayed for dismissal of appeal.


6. Perusal of the record reveals that the appellant was appointed as Primary School Teacher vide order dated 09.04.2016 and after medical certificate/medical examination, the appellant assumed the charge of his post. The record further reveals that the domicile certificate of the appellant was sent for verification to the concerned Deputy Commissioner Torghar and after verification the same was found unverified/fake therefore, the appointment order of the appellant was withdrawn. The record further reveals that the appellant also filed a civil suit for restoration of his domicile certificate and the same was also decree in the favour of the appellant vide detailed judgment dated 23.01.2019. The record further reveals that the respondent-department was required to issue a show-cause notice to the appellant before passing the impugned/adverse order of withdrawal of appointment order of the appellant but neither any show-cause notice was issued to the appellant before passing the impugned/adverse order against the appellant nor opportunity of personal hearing was provided to the appellant therefore, the impugned order is illegal and liable to be set-aside. As such, we partially accept the appeal, set-aside the impugned order with the direction to the respondent-department to issue show-

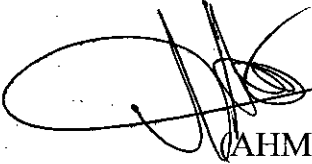
M. Anwar
18.2.2019

cause notice to the appellant that why his appointment order be not withdrawn on such and such allegation and after replying the show-cause notice and personal hearing, the competent authority ^{may} ~~may~~ pass proper order deemed appropriate. However, the reinstatement order of the appellant will be subject to the decision/outcome of the show-cause notice. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

18.02.2019


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT ABBOTTABAD


(AHMAD HASSAN)
MEMBER
CAMP COURT ABBOTTABAD

Service Appeal No. 1243/2016

18.02.2019

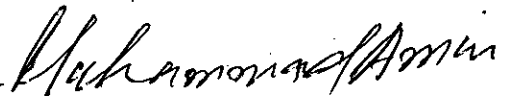
Appellant alongwith his counsel present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Fakhar Saeed, ADO for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today consisting of four pages placed on file, we partially accept the appeal, set-aside the impugned order with the direction to the respondent-department to issue show-cause notice to the appellant that why his appointment order be not withdrawn on such and such allegation and after replying the show-cause notice and personal hearing, the competent authority ^m ~~may~~ pass proper order deemed appropriate. However, the reinstatement order of the appellant will be subject to the decision/outcome of the show-cause notice. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
18.02.2019



(AHMAD HASSAN)
MEMBER
CAMP COURT ABBOTTABAD




(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT ABBOTTABAD

26.06.2018

Appellant Muhammad Usman in person present. Mr. Aurangzeb, SDO on behalf of the respondents alongwith Mr. Ziaullah, Deputy District Attorney present. Counsel for the appellant is busy in the Hon'ble High Court. Adjourned. To come up for arguments on 29.08.2018 before the D.B at camp court, Abbottabad.


Member.


Chairman
Camp court, A/Abad



29.08.2018

None for the appellant Fakher Saeed ADO for the respondents present. Due to summer vacations, the case is adjourned. To come up for the same on 18.10.2018 at camp court Abbottabad.

18.10.2018

Neither the appellant nor his counsel is present. Mr. Fakhar Saeed, ADO alongwith Mr. Usman Ghani, District Attorney for the respondents present. Adjourned. To come up for arguments on 15.01.2019 before D.B at camp court, Abbottabad.



Member


Reader

Chairman
Camp Court, A/Abad

15.01.2019

Learned counsel for the appellant and Mr. Muhammad Bilal learned Deputy District Attorney alongwith Fakhar Saeed ADO present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 18.02.2019 before D.B at camp court Abbottabad.


Member


Member
Camp Court Abbottabad

1243/16

17.10.2017

Appellant in person and Mr. Muhammad Bilal, Deputy District Attorney alongwith Fakhar Saeed, Litigation Officer for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder, if any, and arguments for 17.01.2018 at camp court, Abbottabad.

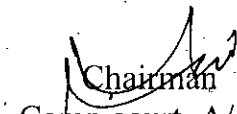

Chairman

Camp court, Abbottabad.

17.01.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Fakhar Saeed, Litigation Officer for the respondents. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 18.04.2018 before D.B at camp court, Abbottabad.

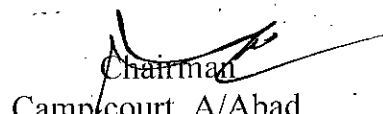

Member


Chairman
Camp court, A/Abad.

18.04.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Fakhar Saeed, Litigation Officer for the respondents present. Counsel for the appellant seeks adjournment. To come up for arguments on 26.6.2018 before the D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad

19.1.2017

Learned counsel for the appellant argued that the appellant was serving as PST BPS-12 when removed from service by cancelling his appointment order vide impugned order dated 07.09.2016 on the allegations of fake domicile certificate where-against his departmental appeal dated 09.09.2016 was not responded and hence the instant service appeal on 16.12.2016.

That the impugned order is against facts and law as no notice whatsoever was issued to the appellant nor opportunity of hearing afforded to him.

Appellant Deposited
Security & Process Fee

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days notices be issued to the respondents. To come up for written reply/comments on 21.04.2017 before S.B at camp court, Abbottabad.

Chairman
Camp court, A/Abad

21.04.2017

Counsel for the appellant and Mr. Fakhar Saeed, ADO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Written reply not submitted. Requested for adjournment. The Worthy Chairman is on leave. To come up for written reply/comments on 25.08.2017 before S.B at camp court, Abbottabad.

Registrar
Camp Court, Abbottabad.

25.08.2017

Clerk of counsel for the appellant and Mr. Muhammad Bilal, Deputy District Attorney alongwith Fakhar Saeed, ADO for the respondents present. Seeks adjournment. Adjourned. To come up for written reply on 17.10.2017 before S.B at camp court, Abbottabad.

Chairman
Camp Court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1243/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16/12/2016	<p>The appeal of Mr. Muhammad Usman received today by post through Mr. Hamayun Khan Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"><i>Signature</i> REGISTRAR</p>
2	27-12-2016	<p>This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>19-01-2017</u></p> <p style="text-align: right;"><i>Signature</i> CHAIRMAN</p>

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1243 /2016

Muhammad Usman S/o Khitab Muhammad (Ex PST Teacher) Govt. Primary School Barbani Torghar resident of Muhammaday Akazai Tehsil Kandar District Tor Ghar.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Memo of Appeal	1 to 7	
2.	Copy of domicile certificate	8-10	"A"
3.	Copy of advertisement	11	"B"
4.	Copy of NOC	12-14	"C"
5.	Copy of appointment order	15-18	"D"
6.	Copy of charge report and medical certificate	19-20	"E"
7.	Copy of impugned order	21	"F"
8.	Copy of departmental appeal	22-23	"G"
9.	Copy of reminder application	24	"H"
10.	Wakalatnama		

M. Usman
...APPELLANT

Through

Dated: 14-12 /2016

(Signature)
(HAMAYUN KHAN)

Advocate High Court, Abbottabad

1

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1298

Dated 16-12-2016

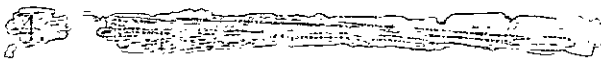
Appeal No. 1243 /2016

Muhammad Usman S/o Khitab Muhammad (Ex PST Teacher) Govt. Primary School Barbani Torghar resident of Muhammaday Akazai Tehsil Kandar District Tor Ghar.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) District Tor Ghar.



...RESPONDENTS

Filed to-day
Sandhe
16-12-16
Registrar

APPEAL UNDER SECTION 4 KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED NOTIFICATION ENDST NO. 2898-2906 DATED 07/09/2016, WHERE BY RESPONDENT NO. 3 WITH DRAW/DENOTIFY, APPOINTMENT ORDER

DATED 09/04/2016 WHICH IS ILLEGAL, AGAINST THE LAW, AGAINST THE FACT, NATURAL JUSTICE, AB-INITIO VOID & LIABLE TO BE SET ASIDE.

PRAYER:- ON ACCEPTANCE OF THE INSTANT APPEAL, ORDER/NOTIFICATION DATED 07/09/2016 MAY KINDLY BE DECLARED NULL AND VOID AND APPELLANT BE RE-INSTEAD ALONG WITH ALL BACK BENEFITS AND ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM FIT AND PROPER.

Respectfully Sheweth;-

May it please your lordship the brief fact of the instant appeal are as under;-

1. That appellant belong from cast Akazai and bonafide resident of District Tor Ghar since fore father. Copy of domicile certificate annexed as Annexure "A".

2. That in the year 2013 appellant applied in police department Tor Ghar against constable post, and after completion of all legal formalities District Police Officer (DPO) issued appointment order of the appellant as constable in BPS-05.
3. That thereafter appellant joined police service and till 09 April 2016 appellant performed duty with honesty and liability and there had no complaint against appellant in respect of duty/responsibilities.
4. That in August 2015 respondent NO. 3 advertised vacant post of teachers in different code including PST. Copy of advertisement is annexed as Annexure "B".
5. That thereafter appellant applied for PST BPS-12 post and submitted all required documents. Copy of NOC is annexed as Annexure "C".
6. That thereafter respondent NO. 3 conducted test interview and after completion of all codal formalities respondent No. 3 on 9 April 2014 issued appointment order of the appellant. Copy of appointment order is annexed as Annexure "D".

7. That after appointment order, appellant submitted his medical fitness and charge report and joined service in Govt. Primary School Darbani Tor Ghar as PST teacher in BPS-12. Copy of charge report and medical certificate is annexed as Annexure "E".
8. That on 07/09/2016 respondent No. 3 issued impugned Notification whereby appointment order dated 09/04/2016 of the appellant was withdraw/denotified. Copy of impugned order is annexed as Annexure "F".
9. That on ~~09/09/2016~~ appellant filed appeal before respondent No. 2 against impugned notification dated 07/09/2016 issued by respondent No. 3. Copy of departmental appeal is annexed as Annexure "G".
10. That on 10/11/2016 appellant again filed application/reminder before respondent NO. 2 for order/disposal of departmental appeal but till date respondent No. 2 not passed any order on the said appeal. Hence, instant appeal on the following

grounds. Copy of reminder application is annexed as Annexure "H".

GROUNDS:-

- a. That, order/notification dated 07/09/2016 issued by respondent No. 3 is illegal against the law, facts and liable to be declared null and void.
- b. That all proceeding were initiated without any notice, information and absence of appellant. Hence, order dated 07/09/2016 is liable to be set aside.
- c. That respondent No. 3 issued impugned notification without any show cause notice, hence impugned order is against the law.
- d. That respondent No. 3 issued so called notification against rule laid down by E&D rules, and ignored all basic principle of the natural justice.

- e. That impugned notification issued on political pressure of local government members.
- f. That impugned order against the constitutional guaranteed rights of the appellant and respondent NO. 3 adopted his own procedure.
- g. That respondent No. 3 ~~not~~ provided any opportunity to appellant to explained his position. Hence, impugned notification is liable to be set aside.
- h. That impugned order against the fundamental rights of the appellant and clear violation of natural justice, hence, liable to be set aside.
- i. That the addresses of the parties have been correctly given in the heading of the appeal.

- a. That other points would be argue at the time of argument with the kind permission of this Honourable Court.

It is, therefore, humbly prayed that on acceptance of the instant appeal, order/notification dated 07/09/2016 may kindly be declared null and void and appellant be re-instead along with all back benefits and any other relief which this Honourable court deem fit and proper.

M. Usman Khan
...APPELLANT

Through

Dated: 14-12 /2016

H. Hamayun Khan
(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

M. Usman Khan
...APPELLANT

DOMICILE CERTIFICATE

DISTRICT TOR GHAR, KHYBER PAKHTUN KHWA



I declare that I was born of parents who are permanently domiciled in Khyber Pakhtun Khwa having to it by birth / settled in it.

I belong by birth to Village MAMMADAY (AKA ZAI)
Tehsil KANDAR District TOR GHAR

MUS
Signature of Applicant
Dated 11/12/2012

Fursuance to the declaration dated / /
Filed by MUHAMMAD USMAN S/O KHITAB MUHAMMAD Domicile in the Khyber Pakhtun Khwa here by certified that the said MUHAMMAD USMAN is born of parents who are permanent resident of the Khyber Pakhtun Khwa having born settled with in it.

Report of Tehsildar (Tor Ghar)

I have satisfied my self from personal / my knowledge verification that the above declaration is true certify.

This day of 2012.

Jan Muhammad
Jan Muhammad
S.C.T (BPS-16)
G.H.S Oghi (Manshra)

Qamari
DEPUTY DISTRICT REVENUE OFFICER
TOR GHAR

No: 4992 DOR Dated 27/12/12
COUNTERSIGNED

Deputy District Officer
Revenue & Estate
Tor Ghar

W
DISTRICT REVENUE OFFICE
TOR GHAR

District Officer

علی بک عزیز خان

Attested by
Qamari

محمد عثمان ولدیت ازہدیہ خطاب محمد اکازی

محمد عثمان کی پائی ہوئی اسٹیٹس ...
محمد عثمان کی پائی ہوئی اسٹیٹس ...
محمد عثمان کی پائی ہوئی اسٹیٹس ...

گواہ نمبر 2

گواہ نمبر 1

نام: زرین خان 2010 سترین سار

نام: زر دوست خان عطر خان

شناختی کارڈ نمبر: 13504-4336532-2

شناختی کارڈ نمبر: 13504-2236620-5

زرین سار



باروز خان 1/2 سیدیں

شناختی کارڈ نمبر: 423019-4033855

محمد عثمان کی پائی ہوئی اسٹیٹس ...
محمد عثمان کی پائی ہوئی اسٹیٹس ...

Yaroz Khan

Qabaili Rehnuma Distt: Ter Gar

NIC: 42301-4033855

13504 3936547-7

خطاب نمبر 1



صداقتی باروز خان ولدیت ازہدیہ خطاب محمد عثمان ولدیت ازہدیہ خطاب محمد عثمان
محمد عثمان کی پائی ہوئی اسٹیٹس ...

11/11/2012


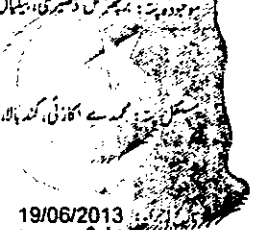

11/11/2012

Verified as per verification of elders & patwari
Rang Bahadur Khan
Kandahar District
District Tax Officer

حکومت پاکستان
 کوی شہنشاہی کارڈ
 13504-4425892-1
 محمد عثمان
 ممبر
 قومی اسمبلی پاکستان
 تاریخ پیدائش: 25/06/1992
 دستخط: محمد عثمان

شہنشاہی نمبر: 13504-4425892-1
 U4J2XP
 محمد عثمان
 ممبر
 قومی اسمبلی پاکستان
 تاریخ پیدائش: 19/06/2013
 تاریخ: 19/06/2023
 دستخط: محمد عثمان

محمد عثمان
 Member
 National Assembly

درخواستیں مطلوب ہیں

محکمہ ایگزیکٹو ایڈمنسٹریشن (مرदानہ) سکولوں میں مندرجہ ذیل آسامیاں پر کرنے کے لئے مطلع تو فر کے کونٹری اہل امیدواروں سے مجوزہ فارم پر مورخہ 28 اگست 2015ء تک درخواستیں مطلوب ہیں۔ درخواست فارم این ٹی ایس (NTS) کی ویب سائٹ (<http://www.nts.org.pk>) پر دستیاب ہے۔ مقررہ تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں پر غور نہیں کیا جائیگا۔

نمبر شمار	نام آسامی	تالیف	مہر کا عدد
1	سی ٹی جنرل (CT) BPS-15	(1) کسی بھی تسلیم شدہ یونیورسٹی سے سیکنڈ ڈیگری میں بیچلر ڈگری (2) کسی بھی تسلیم شدہ ادارے سے سی ٹی سرٹیفکیٹ یا ایس ایٹ ڈگری یا ڈپلوما سان ایجوکیشن	18 35 سال
2	ڈراماٹک ماسٹر (DM) (BPS-15)	(1) کسی بھی تسلیم شدہ یونیورسٹی سے سیکنڈ ڈیگری میں بیچلر ڈگری (2) کسی بھی تسلیم شدہ ادارے سے ایک سالہ ڈراماٹک ماسٹر کورس سرٹیفکیٹ	ایسا
3	مری ٹیچر (AT) BPS-15	(1) کسی بھی تسلیم شدہ یونیورسٹی سے سیکنڈ ڈیگری میں سکول سرٹیفکیٹ (2) حکومت کے تسلیم شدہ تنظیمات، اہلکار المدارس سے شہادۃ العالمیہ، اعلیٰ تعلیم الاسلامیہ العربیہ کی ڈگری یا کسی بھی تسلیم شدہ یونیورسٹی سے سیکنڈ ڈیگری میں ایم اے عربی	20 35 سال
4	پرائمری سکول ٹیچر (PST) (BPS-12)	(1) کسی بھی تسلیم شدہ یونیورسٹی سے انٹرمیڈیٹ سرٹیفکیٹ یا مساوی تالیف (2) کسی بھی تسلیم شدہ ادارے سے سی ٹی ٹی سرٹیفکیٹ یا ڈپلوما سان ایجوکیشن یا ایس ایٹ ڈگری ان ایجوکیشن	18 35 سال

تعمیر و انتظام: اساتذہ کی سلیکشن کیلئے کریمینیا درج ذیل ہیں، ہر ایک 200 نمبرات کی تقسیم اس طرح کی جائے گی۔
(1) سکریننگ ٹیسٹ بذریعہ NTS=100 نمبر (ب) تعلیمی تالیف=100 نمبر جس کی مزید تقسیم اس طرح ہوگی۔

تعلیمی تالیف	کل نمبر	تعلیمی تالیف	کل نمبر
ایس ایس سی	مہل کر وہ نمبر x 20 تقسیم کل نمبر	ایف اے / ایف ایس سی	مہل کر وہ نمبر x 20 تقسیم کل نمبر
بی اے / بی ایس سی	مہل کر وہ نمبر x 20 تقسیم کل نمبر	ایم اے / ایم ایس سی	مہل کر وہ نمبر x 15 تقسیم کل نمبر
بی ایڈ / ایم اے ایجوکیشن	مہل کر وہ نمبر x 15 تقسیم کل نمبر	ایم ایڈ / ایم اے ایجوکیشن	مہل کر وہ نمبر x 5 تقسیم کل نمبر
ایم فل / ای ایچ ڈی	مہل کر وہ نمبر x 5 تقسیم کل نمبر		

نوٹ: 1: ہر سکول کی آسامی کیلئے علیحدہ علیحدہ میرٹ لسٹ مرتب کی جائیگی۔ جس میں امیدواروں کے NTS کے مہل کر وہ نمبر اور تعلیمی تالیف کے نمبروں کو جمع کیا جائے گا۔
2) ہر امیدوار سے NTS کی درخواست فارم 300 روپے چارج کیا جائے گا۔ اگر ایک امیدوار پانچ سکولوں کے لئے درخواست دے گا تو اس سے صرف 800 روپے ہی NTS چارج کرینگے، جو کہ امیدوار خود برداشت کریں گے۔ تمام امیدواروں کو ہدایت کی جاتی ہے کہ وہ باقاعدگی سے NTS کی ویب سائٹ کوڈز کرتے رہیں۔
خصوصی مشورے: 1) تمام امیدواروں کے ڈوئیز سائل اور شناختی کارڈ میں مستقل کونٹریٹ مطلع تو فر کا ہونا چاہیے۔ درجہ ذیل درخواست پر غور نہیں کیا جائے گا۔ جبکہ بی ایس سی کی پوسٹوں کیلئے جس سکول میں آسامی خالی ہے امیدوار وہاں ہی پوزیشن کو تسلیم کرنا چاہئے۔ اگر کسی پوزیشن میں امیدوار موجود نہیں تو اس آسامی کیلئے ملحقہ پوزیشن کو تسلیم کرنے کے لئے امیدواروں کو زبردستی فوراً لایا جائے گا۔ 2) تمام تقرریاں خالصتاً ہارڈ کاپ پر Adhoc اور کنٹریکٹ پر ایک سال کیلئے ہوں گی۔ 3) اہل امیدواروں کی موجودگی میں کسی کو بھی Age Relaxation نہیں دی جائیگی۔ 4) انٹرویو کے وقت اعلیٰ تعلیمی اسناد بعد اہل شناختی کارڈ اور پوسٹ کے دن صرف اعلیٰ شناختی کارڈ لانا لازمی ہے۔ 5) میرٹ پر آنے والے امیدواروں کی اسناد مختلف ادارے سے تقدیر کرانی جائے گی جس کے تمام اخراجات امیدوار کو برداشت کرنا ہوں گے۔ 6) انٹرویو کیلئے آنے والے امیدواروں کو کوئی ٹی اے ڈی نہیں دیا جائے گا۔ 7) صرف مقررہ وقت کے اندر موصول ہونے والی درخواستوں پر غور کیا جائیگا۔ 8) زبردستی کو اختیار حاصل ہے کہ وہ کوئی دوسرے تعلقہ یا کسی بھی وقت گلی یا چروئی طور پر انٹرویو منسوخ کر دے۔ 9) اگر اس اشتہار کے بعد حکومت وقت کی طرف سے بھرتی کے طریقہ کار میں تبدیلی کی گئی تو سلیکشن کمیٹی اس کے مطابق عمل کرنے کی پابند ہوگی۔ 10) محکمہ ایگزیکٹو ایڈمنسٹریشن کو اختیار حاصل ہوگا کہ وہ نام خالی آسامیوں یا اس سے کم پر امیدوار بھرتی کرے۔ 11) تمام تقرریاں حکومت خیر مکتوخوا کے مقرر کردہ قوانین و مجوزہ طریقہ کار کے مطابق خالصتاً میرٹ کی بنیاد پر ہوں گی۔ 12) تمام تعلیمی اسناد صرف گورنمنٹ کے تسلیم شدہ اداروں کی قابل قبول ہوں گی۔ 13) اگر کسی امیدوار کی اسناد جعلی پائی گئی تو اس کے خلاف قانونی چارہ جوئی کی جائے گی اور آئندہ کے لئے اسے سرکاری ملازمت کے لئے نا اہل تصور کیا جائے گا۔ 14) نامہ عمل فارم یا معلومات کی صورت میں درخواست فارم خود بخود منسوخ تصور کیا جائے گا جس کے لئے کوئی اپیل منظور نہیں کی جائے گی۔ 15) انٹرویو کیلئے ایک شیڈول جاری کیا جائے گا۔ 16) تمام تقرریاں متعلقہ اضلاع کے ڈویژنل کی بنیاد پر ہوں گی۔ 17) امیدوار کو کسی سکول میں مرسوس کرنا ہوگی جو کہ قابل تبادلہ ہوگی۔ 18) ایک امیدوار بیک وقت 5 سکولوں میں خالی آسامیوں کیلئے درخواست دے سکتا ہے۔ 19) اہلیتی امیدواروں کے لئے 3% جبکہ معذور افراد کے لئے 2% کوڈز مختص ہے۔ 20) درخواست دینے کا طریقہ کار NTS کے ویب سائٹ پر موجود ہے۔ 21) متعلقہ خالی آسامیوں کی تفصیل سکول دائرہ درخواست فارم کے ساتھ NTS کے ویب سائٹ پر دی گئی ہے اور ہر سکول کا اپنا کوڈ دیا گیا ہے۔

عبداللہ خان... ڈسٹرکٹ ایجوکیشن آفیسر

محکمہ ایگزیکٹو ایڈمنسٹریشن (مرदानہ) مطلع تو فر

Say No
to Corruption

* InfoKPGovt * @InfoKPGovt * Send KP to 8333

INF(P)3916

استاذ



Annexure "C" 12

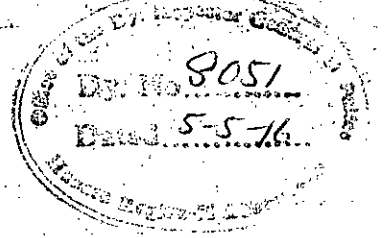
OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

No. 4651 /E-IV dated Peshawar the 4/5 /2016

To : The Regional Police Officer,
Hazara Region, Abbottabad.

Subject: REQUEST FOR PERMISSION OF NOC

Memo:



Constable Muhammad Usman No. 385 of District Police Torghar is hereby allowed to join Education Department subject to clearance certificate by the District Police Office Torghar.

No: 10697/EL
Dt: 05-05-16

DPO Torghar

For information &
Action please.

(NAJEEB-UR-REHMAN BUGVI)PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Najeeb

Ali
RPO Hazara

Attested
V Am

13

حاشیہ نمبر 13

فارم نمبر (1) 12-18

پولیس فارم نمبر 17

حکمہ پولیس

نقشہ نمبر 13 چال میں رگروٹ نام قربانی SHO-PS-Deobank
نمبر 385
28-07-13
2013 سے بعدہ کا نہیں مرنی کیا گیا۔

19-6-13
PS-Deobank

ولایت صوبہ پنجاب ذات اکارلی مذہب اسلام نیرتہ پٹنہ
سکونت موضع قنڑے قائد دارینی ضلع لوہانسر
تاریخ سال 1992 ماہ 06 دن 25 قمری 8
تاریخ جولائی 2013
تفصیلات شناخت۔

جماتی گزٹ 33

تعلیم	حالات	ملازمت			سابقہ		قربی رشتہ داران
		نام بیدہ	تاریخ ملازمت	عرصہ	درجہ ادائیگی	نام	
FSC	رطوبت کسلی دوبنی کیا گیا						

قربی رشتہ داران جو گورنمنٹ میں ملازمین ہیں

نام رشتہ کیا ہے	اس عہدہ پر ہے	اس قلم میں ہے	اس مقام پر ہے	حقیقت

میں مندرجہ ذیل اشخاص کو تفصیل ایضاً وزارت قرار دیتا ہوں

میں اقرار کرتا ہوں کہ امور مندرجہ بالا جو میں نے درج کرائے ہیں صحیح اور درست ہیں۔
یہ بات ثابت ہے

محمد علی
محمد علی

C

14

جناب عالی

عہدہ گزارش عہدہ سائل فیکٹوری میں (B.P.S.12) P.S.T
کی پوسٹ پر اپلائی کرنا چاہتا ہے۔
بذریعہ درخواست اس پر عہدہ سائل کو اپلائی (APPLY) کرنے
کی اجازت دی جائے۔

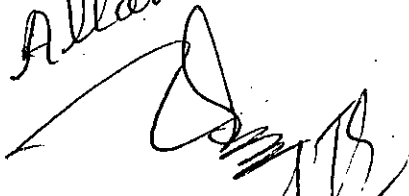
سین لوزس بیوی

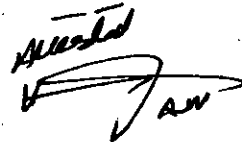
الغازی کنیل محمد عثمان 385

متعین لوہے لائن سربراہ فیکٹوری کوٹوالہ

Sir
bonawad
8
20-7-15
10-8-15

Allowed


DPOTB
10/8/15


Jan



Annexure "D" 15
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT TOR GHAR

NOTIFICATION

Consequent upon the recommendations of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant posts of Primary School Teacher (PST) on School based in BPS-12 (Rs.9055-650-28555) @ Rs.9055/- fixed plus usual allowances as admissible under the rules on adhoc basis and school basis initially for a period of one year under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge :-

Attended

S NO	NAME OF CANDIDATE	FATHER'S NAME	SCORE	WARD/ UNION COUNCIL	NAME OF SCHOOL WHERE APPOINTED	REMARKS
1	Naseeb Rahim	Qareeb Khan	82.37	Balkot	GPS Bateela	Against V/P
2	Umar Habib	Latif Ur Rehman	64.56	Balkot	GPS Balkot	--do--
3	Shabir Ahmad	Habib Ur Rehman	64.03	Balkot	GPS Pakban	--do--
4	Waez Ullah	Muhammad Israr	78.78	Judba	GPS Sormal N/Khail	--do--
5	Rahman Ullah	Muhammad Husan	53.26	Balkot	GPS Sormal N/K	--do--
6	Abdullah	Taluq Khan	64.81	Bimbal	GPS Bilyani	--do--
7	Gulab Zada	Naseeb Zada	84.78	Bimbal	GPS Bilyani	--do--
8	Irshad Ullah	Habib Ullah	82.25	Bimbal	GPS Warokay Kilay	--do--
9	Sadiq Zar	Gula Zar	79.8	Bimbal	GPS Warokay Kilay	--do--
10	Muhammad Usman	Khitab Muhammad	80.58	Darbani	GPS Darbani	--do--
11	Majid Khan	Shahedol	70.05	Darbani	GPS Darbani	--do--
12	Abdul Mujeeb	Fazal Kareem	75.55	Darbani	GPS Jhango	--do--
13	Rozamin	Malik Said	85.44	Bimbal	GPS Khadang	--do--
14	Mastoreen	Meem Zaman	62.86	Darbani	GPS Lashora	--do--
15	Ameer Khan	Muhammad Khan	65.29	Bimbal	GPS Mera Aka Zai	--do--
16	Mumtaz Khan	Ajmal Khan	70.52	Bimbal	GMPS Dilyari	--do--
17	Muhammad Anwar	Gul Nazar Said	81.32	Dour Mera	GPS Dada Banda	--do--
18	Umar Ali	Taliwan Said	77.58	Dour Mera	GPS Dada Banda	--do--
19	Umar Rehman	Ghulam Khan	61.73	Dour Mera	GPS Danda Banda	--do--
20	Muhammad Nawab	Fazal Wahab	73.43	Dour Mera	GPS Dour Pain	--do--
21	Alim Ullah	Taliq Zar Khan	61.98	Dour Mera	GPS Dour Pain	--do--
22	Umar Zahid	Said Fazal Hakeem	73.29	Dour Mera	GPS Dour Mera	--do--
23	Shah Fahad	Israfeel	62.13	Dour Mera	GPS Sado Khan	--do--
24	Nor Nabi Said	Muhammad Akram	60.6	Dour Mera	GPS Zezari	--do--
25	Umar Nosh	Zar Farosh	58.77	Dour Mera	GPS Zezari	--do--
26	Fazal Nawaz Khan	Mir Nawaz Khan	76.48	Gari H/Zai	GPS Ambar Gari	--do--
27	Muhammad Iqbal	Muhammad Laiq	82.02	Gari H/Zai	GPS Bayo	--do--
28	Gul Nabi Shah	Hamza Ali Shah	75.41	Gari H/Zai	GPS Gari Hasan Zai	--do--
29	Jehan Zeb Khan	Fareed Khan	70.24	Gari H/Zai	GPS Gari Hasan Zai	--do--

30	Akhtar Muhammad	Yaqeen Khan	67.81	Gari H/Zai	GPS Gari Hasan Zai	--do--
31	Abdul Jalil	Abdul Wahid	106.38	Gari H/Zai	GPS Gari Kotwal	--do--
32	Faiz Ur Rehman	Sahib Rahman	67.27	Gari H/Zai	GPS Gari Kotwal	--do--
33	Raqib Ullah Khan	Amin Khan	87.81	Paloosa	GPS Gatta Umar Khan	--do--
34	Naseer Ullah	Jehan Zaib	85.92	Paloosa	GPS Gatta Umar Khan	--do--
35	Yousuf Gul	Sahib Gul	75.71	Palosa	GPS Gatta Umar Khan	--do--
36	Ishafaq Ullah	Zareen Khan	65.23	Gari H/Zai	GPS Malyar	--do--
37	Abdus Sadiq	Naseem Khan	61.48	Gari H/Zai	GPS Malyar	--do--
38	Sana Ullah	Abdur Rauf	90.7	Harnail	GPS Petawo Asharay	--do--
39	Gul Faroosh Farooqi	Karamat Khan	85.43	Harnail	GPS Shaloon	--do--
40	Hashamali	Hazrat Ahmad	87.15	Harnail	GPS Soray Asharay	--do--
41	Muhammad Islam	Ahmad Latif	79.03	Harnail	GPS Zangia	--do--
42	Bakhtzada	Nawab Muhammad	91.4	Jhatka	GPS Mori Bala	--do--
43	Noor Zada	Ghulam Muhammad	65.46	Jhatka	GPS Shatal	--do--
44	Qadar Muhammad	Taluq Khan	85.56	Judba	GMPS Judba	--do--
45	Ghani Ur Rehman	Rokhman Shah	62.28	Judba	GPS Shadag	--do--
46	Muhammad Ikram	Muhammad Ishaq	55.86	Judba	GPS Shagai	--do--
47	Muhammad Rafiq	Muhammad Niqab	89.01	Judba	GPS Shadag	--do--
48	Fathullah Pathan	Shabir Ahmad	69.25	Judba	GPS Shagai	--do--
49	Atta Ullah	Shehzada	61.38	Harnail	GPS Shadag	--do--
50	Syed Farman Ullah Shah	Syed Usman Ullah Shah	75.28	Kand	GPS Kand Bala	--do--
51	Zafar Ullah	Sher Zada	91.1	Khovar M.K	GPS Chund	--do--
52	Athar Ullah	Muhammad Raheem	85.3	Khovar M.K	GPS Chund	--do--
53	Amin Said	Qeemat Said	83.62	Khovar M.K	GPS Chund	--do--
54	Behrullah	Sher Zada	76.42	Khovar M.K	GPS Gari Mada Khail	--do--
55	Rahman Ullah	Muhammad Hanif	73.32	Khovar M.K	GPS Gari Mada Khail	--do--
56	Faisal	Yad Ullah	80.42	Khovar M.K	GPS Kalsoona	--do--
57	Muhammad Ismaeel	Bakht Zada	103.3	Khovar	GPS Legra	--do--
58	Tahir Muhammad	Baz Muhammad	92.21	Khovar	GPS Sonia	--do--
59	Zahid Said	Umar Said	87.85	Khovar	GPS Tara	--do--
60	Zar Muhammad	Wala Jan	78.49	M M Khail	GPS Chamgah Doga	--do--
61	Ibrahim Khan	Sabit Khan	79.48	M M Khail	GPS Dilo Bala	--do--
62	Zar Muhammad Shah	Muhammad Shah	75.77	M M Khail	GPS Dilo Payeen	--do--
63	Anwar Zaib	Shah Hussain	77.54	M M Khail	GPS Gawandla	--do--
64	Muhammad Shahid	Sheikh Fareen	83.92	M M Khail	GPS Gawandla Bala	--do--

65	Muhammad Shoaib	Zamin Khan	70.96	M. M Khail	GPS Lakwal	--do--
66	Siraj Ullah	Muhammad Arif	77.09	M M Khail	GPS Mabra	--do--
67	Abu Bakar	Lal Sharif	75.58	M.M Khail	GPS Mabra Bala	--do--
68	Muhammad Hanif	Palas Khan	75.49	M M Khail	GPS Mera K.D	--do--
69	Yas Muhammad	Zubaid Khan	88.96	M M Khail	GPS Shabaz	--do--
70	Saeed Rehman	Saidmar Khan	76.06	M M Khail	GPS Shabaz	--do--
71	Muhammad Zahid	Ghulam Saeed	72.21	M M Khail	GPS Tetay	--do--
72	Abdul Manan	Muhammad Ayub	90.85	Manjakot	GMPS Shanai Pain	--do--
73	Israr Ahmad Khan	Muhammad Farosh Khan	101.24	Tilli	GPS Abo Hasan Zai	<i>Attached</i> --do--
74	Shair Muhammad Zal	Muhammad Afzal	76.82	Manjakot	GPS Abo Mada Khail	<i>Manjakot</i> --do--
75	Muhammad Ibrahim	Nasrullah Khan	81.69	Manjakot	GPS Doba	--do--
76	Inam Ul Haq	Sahib Shah	78.65	Manjakot	GPS Doba	--do--
77	Irfan Ul Allah	Waris Khan	77.72	Manjakot	GPS Karor	--do--
78	Asif Nawaz Khan	Wahid Gul	73.77	Manjakot	GPS Karor	--do--
79	Imam Gul	Baram Gul	71.68	Manjakot	GPS Karor	--do--
80	Roheeb Gul	Sakhimat Khasn	70.34	Manjakot	GPS Karor	--do--
81	Muhammad Saleh	Wazir Muhammad	66.56	M. M Khail	GPS Manjakot	--do--
82	Khawaj Muhammad	Muhammad Ashraf	67.2	M. M Khail	GPS Manjakot	--do--
83	Zarkhaib Gul	Sakhimat Gul	66.0	Manjakot	GPS Manjakot	--do--
84	Zakir Khan	Nazar Meet Khan	65.2	Manjakot	GPS Manjakot	--do--
85	Naseeb Ullah	Jehanzeb	101.82	Palosa	GPS Kandar Tawara	--do--
86	Muhammad Zahid	Muhammad Naseeb Khan	79.13	Paloosa	GPS Kunhar Sharif	--do--
87	Muhammad Riaz	Karim Shah	79.36	Palosa	GPS Paloosa	--do--
88	Noor Faiser Gul	Gul Khan	69.13	Shingaldar	GPS Banjo Banda	--do--
89	Syed Mehtab Shah	Syed Khitab Shah	82.69	Tilli	GPS Gangat	--do--
90	Abdullah	Mehmood Ur Rehman	99.81	Tilli	GPS Maira Khankhail	--do--
91	Ibrar Ahmed	Muhammad Ferosh Khan	78.15	Tilli	GPS Maira Khankhail	--do--
92	Muhammad Amin	Muhammad Tahir	73.04	Tilli	GPS Mishkot	--do--
93	Syed Muslim Shah	S.Taj Muhammad Shaha	57.9	Tilli	GPS Mishkot	--do--
94	Mohib Ullah	Ghulam Bahadar	62.28	Tilli	GPS Reel	--do--
95	Muhammad Suleman	Abid Khan	53.9	Tilli	GPS Sabay	--do--
96	Syed Sahib Zar shah	Syed Bakht Shah	50.95	Tilli	GPS Tilli Sydan	--do--
97	Syed Bakht Munir shah	Naseebzar Shah	43.86	Tilli	GPS Tilli Sydan	--do--

TERMS & CONDITIONS:

1. NO TA/DA is allowed.
2. Charge reports should be submitted to all concerned in duplicate.

18

3. Appointment is purely on temporary & adhoc basis initially for a period of one year.
4. They should not be handed over charge if their age is above 35 years or below 18 years.
5. Their Appointments are subject to the condition that their **CERTIFICATE/DOCUMENTS AND DOMICILES** be verified from the concerned authorities by the District Education Officer before release of their salaries. Anyone who found producing fake documents will be dismissed from service and the case will further be reported to the law enforcing agencies for action under the relevant law.
6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government treasury.
7. Their Pay will not be activated until and unless pay release order is not issued by the competent authority after verification of their documents by the District Education Officer.
8. They should join their post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. They should produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
10. They will be governed by such rules and regulations as may be issued from time to time by the Government.
11. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be preceded under the rules framed from time to time.
12. Their appointment is made on School based, they will have to serve at the place of posting, and their services are not transferable to any other station.
13. The competent Authority reserve the right to rectify the errors and omissions, if any noted/observed at any stage in the instant order issued erroneously.
14. Before handing over charge once again their document may be checked by the SDEO (M) Tor Ghar if they don't have the prescribed qualifications prescribed for the post they should not be handed over the charge.

--SD--
Abdullah
District Education Officer (M)
E&SE Tor Ghar

Endst: No. 908-18/Dated Tor Ghar 09th April 2016.

Copy forwarded for information and necessary action to the: -

1. Secretary to Government of Khyber Pakhtunkhwa E&S Education Department Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. PS to Minister E&SE Department Khyber Pakhtunkhwa Peshawar.
4. Deputy Commissioner District Tor Ghar.
5. District Accounts Officer Tor Ghar at Mansehra.
6. Sub Divisional Education Officer (M) Tor Ghar.
7. District Monitoring Officer (IMU) Tor Ghar.
8. District Education Management Information System (DEMIS) Local Office.
9. Head Teacher GPS Concerned.
10. Official Concerned.
11. Office File.

Attested
[Signature]

[Signature]
District Education Officer (M)
E&SE Tor Ghar

Anneure "E"

19

حاضری (پورٹ)

تصدیق کی جاتی ہے جسے عدسہ محمد عثمان s/o خطاب محمد P.S. 12
 B.P.S 12 کی پوسٹ پر آرڈر نمبر 114 اندوٹو سمنٹ لمبر 908-18
 مورخہ 9-04-2016 آئندہ از ڈسٹرکٹ ایجوکیشن آفیسر (M)
 ضلع اورنگزیب کی طرف سے جس کے مورخہ 04-04-11 کو
 قبل از دوپہر گورنمنٹ پرائمری سکول ڈربنی (کارٹی
 میں حاضری کر کے خارج سے بحال کیا۔

H. T. G.P.S Darbani

حاضری (پورٹ) D.E.O
آفس ارسال دفتر سے

S.D.E.O

ارسال دفتر سے

wp

HEAD TEACHER
GPS Darbani
District Torghar

Attested
[Signature]

MEDICAL CERTIFICATE

Name of Official Muhammad Usman
 Father's Name Khilaf Muhammad
 Date of Birth 25-6-1992
 Caste of Race Akazi
 Address Mohamedy Adazi - Kand Bala
 Tehsil Kandah District Torghar
 Exact height by measurement 5-8"
 Personal mark of identification - Nil -
 CNIC No. 13504-4425892-1
 Signature of official M. Usman
 Signature of head of office _____

Attest
[Signature]

SEAL OF OFFICE

I do hereby certify that i have examined MR, Muhammad Usman
 Employment in the office of the DEO (male)
 And cannot discover that he had any disease communcable of other constitutional affection or bodily infirmity exopt - Nil -
 I do not consider this as disqualification for emplment in the office of the DEO (male)
 His age according to his own statement is Twenty Four (24)
 Years and by appearance about Twenty Four (24) years.
 Left thumb and finger impression



[Signature]
 Medical Officer
 BHU Judba
 District: Torghar
 District Health Officer
 Torghar

Annexure "F"

21



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TOR GHAR

Ph. 0345-6660087 Fax. Nil

No. _____

Email. torgharem@gmail.com

Dated: ____ / ____ / 2016

NOTIFICATION

Reference to the Deputy Commissioner Tor Ghar letters No. Gen (2016)/DC/TG 1936 Dated 30/08/2016 and Assistant Commissioner Letter No. AC(2016)/TG 2792-93 dated 18/08/2016, in connection with the terms and conditions No. 5 of the Appointment order issued vide this office Notification No.908-18 Dated 09/04/2016, the competent authority E&SE Tor Ghar is pleased to withdraw/denotify the appointment in respect of Muhammad Usman S/O Khitab Muhammad PST GPS Darbani w.e.f the date of his appointment.

---SD---

District Education Officer (M)
E&SE Tor Ghar

Endst: No 2898-2906 Dated 7/9/2016.

Copy for Information to the.

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Tor Ghar with the remarks that denotification and legal action has been initiated against the teachers as directed.
3. District Police Officer Tor Ghar with request to Lodge FIR as per rules against above mentioned candidate.
4. District Nazim Tor Ghar.
5. District Account Officer Tor Ghar at Mansehra.
6. Sub Divisional Education Officer (M) Tehsil Kandar.
7. District Monitoring Officer (IMU) Tor Ghar.
8. District Education Management Information System (DEMIS) Local office.
9. Office File.

Dy: District Education Officer (M)
E&SE Tor Ghar

Attested
[Signature]

Note. All employees education department & other interested ones, please Type "Follow torghardeo" in your mobile message & send it to "40404" to get free tweets of DEO Education Torghar on your mobile.

محترم جناب ڈائریکٹر سپر ماہر اعلیٰ تعلیمی ائب اینڈ سٹینڈرڈز اور کونسل

KPK ریسٹا اور

Attested



ادیل برائے بحالی کروس

جناب - عالی اڈیل ڈیل مرہن ہے۔

1۔ تاکہ ڈسٹرکٹ ایجوکیشن آفیسر (سرڈائن) قلعہ تورنہ میں محکمہ تعلیم میں عالی اساتذہ کو نوٹ کرنے کے سلسلے میں آگے میں اشتہار جاری کیا۔

2۔ تاکہ آگے بعد سائل نے پروئے پروم قوانڈ اپنے اسناد و نوٹ DEO ماہر کے آفس میں آگے

3۔ تاکہ آگے بعد تمام سر لو اوزت برار اپنے سے بعد DEO ماہر نے سائل کو پروئے ⁶⁴ 9/2016 End No. 908-18/Dated کو بحیثیت آڈیٹر (نقل لے ہے)

4۔ تاکہ کھیاتی کے بعد سائل نے ڈیوٹی کرانیم دینا شروع کیا اور خوش اسلوبی سے 7-9-2016 تک کرانیم دینا رہا

5۔ تاکہ 7-9-2016 کو DEO ماہر نے لیکر کسی وجہ سے سائل کے کھیاتی کے آرڈر کو (with draw)

کیا۔ (نقل بنا ہے)

6۔ تاکہ مذکورہ حکیم کو 2016-17-9 کو جاری کرنے سے پہلے
DEO صاحب نے نہ تو مسائل کو کوئی نوٹس دیا اور نہ
دبیرہ دیا اور تمام کارروائی خود ساختہ طریقے سے
کرتے ہوئے مسائل کو مذکورہ کارروائی دبیرہ سے
لاسم رکھا۔

7۔ تاکہ مذکورہ حکیم جاری کرنے سے پہلے DEO صاحب نے
قانون کے تمام لوازمات کو سرے سے نظر انداز کر کے
جاری کیا اور مسائل کو نوٹس سے نکال دیا۔

8۔ تاکہ مسائل ایک ڈیپ آرڈر سے اور اباڈا ابدال سے
غیر دیگر ڈیپ آرڈر کے سامنے پہلے نوٹس سے نکلتے رہیں
اور کوئی ذریعہ تلاش نہ ہے

لہذا اس کے عائد مسائل کو اس کے منظور
فرماتے ہوئے مسائل کو نوٹس سے نکال کیا جائے۔

الموقع 9 ستمبر 2016

محمد عثمان دلہرخدا ب محمد (سابقہ) Pst ڈیپ گورنمنٹ ریلوی
سکول درہی فورنرس (سابقہ) اکاؤنٹ محمد کے محفل کھنڈر
ضلع فورنرس

M. Us

محترم جناب ڈائریکٹر صاحب ایگزیکٹو ایڈمنسٹریشن (ایجوکیشن)

KPK کشمیر

Allahabad
Adw

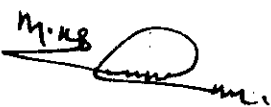
درخواست برائے منسلق فرمائے جانے والے مسائل

جناب عالی!

- 1۔ یہ کہ مسائل کے مورفہ 2016-17-18 کے پاس
محکمات ادبیل بر فونڈ حکم نمبر 7-9-2016 ڈاکٹر سیما ہے۔
 - 2۔ یہ کہ 2 ماہ گزرنے کے باوجود مسائل کا محکمات ادبیل
عامال کوئی منسلق جناب کے نہیں سنایا۔
 - 3۔ یہ کہ مسائل کو غیر تازگی طریقے سے نوکری سے بہترین
سیما ہے اور ادبیل؟ جناب کے پاس زیر تحریر ہے
(منسلق ایڈمنسٹریشن)
- ایگزیکٹو ایڈمنسٹریشن کے مسائل کی ادبیل نمبر 9/16
ڈاکٹر منسلق ایڈمنسٹریشن فرمایا جاوے۔

المترجم 10-11-2016

محمد عثمان ولد غلام - محمد (سابقہ آئی ڈی) ڈائریکٹر ایڈمنسٹریشن ایجوکیشن
سکول درہنہ ڈرغہ (سابقہ محمدیہ اسکول) اکاؤنٹس کے عمل کنندہ

M. M. S. 

نقل حکم از دفتر عدالت عالیہ فیصل آباد سے منسوخ کیا گیا۔

عدالت عالیہ فیصل آباد 26/1/2016 - فیصلہ 23/01/01

لسانیت خاں سید عیوب قاسم صاحب منسوخ فیصلہ عدالت عالیہ فیصل آباد

محمد عثمان ولد عطاء محمد قوم عن زنی قوٹ وال
کنزہ خدیجہ اکاڑ نے کفیل نندرا ٹورنٹس

Senior Civil Judge
Manshra
26-1-17

نام

1. ڈی جی عدالت فیصل آباد ٹورنٹس

2. ایڈووکیٹ مسٹر عطاء محمد قوم ٹورنٹس

3. کفیل نندرا ٹورنٹس

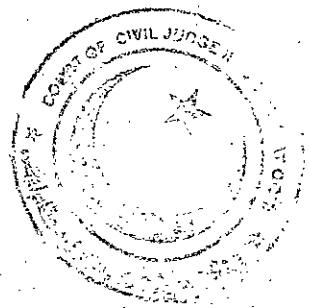
4. مگر ڈاؤن سٹیٹ ٹورنٹس

5. ایڈووکیٹ خدیجہ اکاڑ نے کفیل نندرا ٹورنٹس

6. ایڈووکیٹ ڈاکٹر سید عیوب قاسم ٹورنٹس

7. ایڈووکیٹ خدیجہ اکاڑ نے کفیل نندرا ٹورنٹس

درعنا لکھنؤ



و... دعوئی برادری اور ڈگری استوار فیصلہ سے وارد اور عدالت

(محمد عثمان ولد عطاء محمد قوم عن زنی قوٹ وال محمد)

اکاڑ نے ایڈووکیٹ عیوب قاسم ٹورنٹس کفیل نندرا ٹورنٹس

باشندہ سے اور کفیل نندرا ٹورنٹس سے عدالت عالیہ

لسانیت خدیجہ اکاڑ نے کفیل نندرا ٹورنٹس (2016) DC/TG/1938/16/8

باب لکھنؤ Domicile عدالت عالیہ فیصلہ 145

IN THE COURT OF CIVIL JUDGE-I
TORGHAR AT OGH

42

Civil Suit No.....93/1 of 2017
Date of Institution.....26.01.2017
Date of Transfer-In.....13.05.2017
Date of Decision.....23.01.2019

Muhammad Usman son of Khtiab Muhammad caste Hassan Zai, kotwal, resident of Muhammaday Akazai, Tehsil Kandar, District Torghar.

(Plaintiff)

VERSUS

1. Deputy Commissioner District Torghar.
2. Assistant Commissioner, Torghar.
3. Tehildar, Tehsil Kandar, Torghar.
4. Gardawar Circle, Kandar Torghar.
5. Patwari Halqa Muhammaday Akazai, union council Darbani, Tehsil Kandar, Torghar.
6. Assistant Director local government, District Torghar.
7. Secretary village council, Darbani, Kandar, Torghar.

(Defendants)

SUIT FOR DECLARATION, MANDATORY INJUNCTION
AND PERMANENT INJUNCTION

Presence

Mr. Asif Ben Shams,
advocate for plaintiff

District attorney for defendants

JUDGMENT

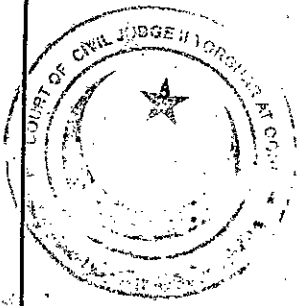
23.01.2019

Plaintiff Muhammad Usman has brought the instant suit for declaration against defendants deputy commissioner and six others, to the effect that plaintiff is by caste Hassan Zai, Kotwal, Muhammaday Akazai and is permanent resident of Tehsil Kandar, District Torghar,

Javed
Bakht Zada Khan
Civil Judge, Torghar
(at Ogh)
23-01-19

AT/1/19


Signature: *[Signature]*
Date: 19-2-19




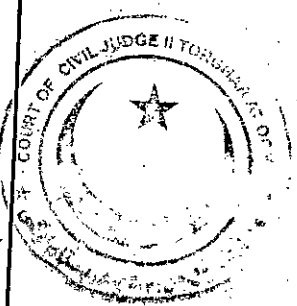
43

and letter No. Gen(2016)/DC/TG/1936 dated 30.08.2016 regarding verification of Domicile of the plaintiff at serial number 145, is wrong, against law and facts and ineffective upon the rights of the plaintiff. That the defendants are bound to restore domicile of the plaintiff dated 27.12.2012 or issue new domicile certificate to him.

The plaintiff alleged that since his forefathers, along with other family members, they are owners in possession of about 3000 Kanal landed property at muaza Soormal Akazai, Tehsil Kandar, Torghar and after completion of his graduation, he applied for domicile certificate, which was issued to him after verification of responsible elders, government servants and fulfillment of legal formalities by defendant No.1 on 27.12.2012. That he was appointed as police constable at District Torghar on 07.03.2013 after clearance. He applied for the post of PST at District Torghar and on 09.04.2016. The plaintiff was appointed as PST and after taking charge of his post, the defendants under the political influence canceled (unverified) the domicile certificate of the plaintiff on 30.08.2016. That he was deprived of his fundamental right.


Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)
23-01-17

ATTENDED
Signature 
Date 14-2-17



The family tree of the plaintiff is as follows.

44

Muhammad Usman son of Khitab Muhammad
son of Gul Muhammad son of Muhammad Sadiq son of
Masoom Baba.

That defendants were asked to restore the domicile
certificate of the plaintiff or issue new one, but they were
reluctant and is refusing to do so for the last 10 days.

The defendants were summoned, who appeared
through their representative and district attorney Torghar,
who submitted written statement on behalf of the
defendants. The defendants alleged in their written
statement that the plaintiff is ex-civil servant and has
submitted his case before the services tribunal and that he
has got no rights to file the instant suit. It is alleged that
neither plaintiff nor his forefathers were resident of
District Torghar. No settlement has taken place in the
District and Domiciles were used to issue at the
verification of any two local persons. After appointment
of the plaintiff in education department, during re-
verification his domicile is found as fake.

The divergent pleading of the parties were reduced
in to the following issue by my learned predecessor in
office.

Issues:

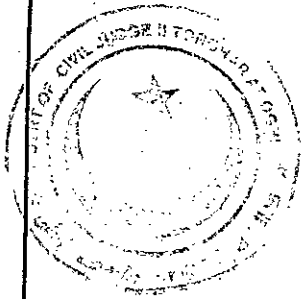
1. Whether the plaintiff has a cause of action?
2. Whether the plaintiff is estopped to sue?

Jaker
Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)

23.01.17

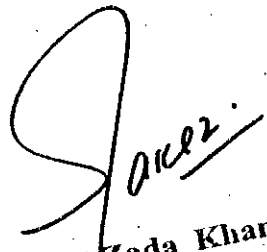
P.O.

14.2.17



45

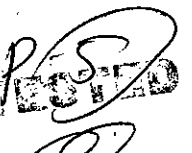
3. Whether the suit is bad in its present form?
4. Whether this court has got jurisdiction to entertain the instant suit?
5. Whether the plaintiff is bona-fide resident of District Torghar and resulted into the issuance of domicile. If yes if effects?
6. Whether the domicile of plaintiff was rightly cancelled by the defendants? if yes its effects.
7. Whether the plaintiff is entitled for the decree of declaration as per prayer "Alif"?
8. Whether the plaintiff is entitled for the decree of mandatory injunction as per prayer "Bai"?
9. Whether the plaintiff is entitled for decree of permanent injunction as per prayer "Jeem"?
10. Whether the plaintiff is entitled for the decree as prayed for?
11. Reliefs


Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)
23-01-18

Both the parties were asked to produce evidence on the above issues.

Plaintiff recorded his own statement as PW-1. He got exhibited affidavit regarding verification duly signed by Gul Taj Wali (district member), Noureen Khan (Tehsil member), Naseeb Rokhan (Chairman Village Council) and Bakht Munir (vice chairman). He stated that without giving opportunity of hearing to him, defendants issued notification dated: 27.12.2012.

PW-2 is the statement of Gul Taj Wali (member village council), who appeared in support of Ex:PW1/1


ATTESTED
Signature
Date 14-2-18



and verified his signature on the same. He was cross-examined by the counsel for the defendant.

Niaz Muhammad Khan also recorded his statement as PW-3 in support of stance of the plaintiff. The plaintiff closed his evidence.

On the other hand, Faisal Latif, assistant at Deputy Commissioner Office recorded his statement as DW-1. According to him, procedure for verification of domicile in District Torghar is different from other districts as no settlement has yet taken place at District Torghar. He stated that verification of domicile is initially made by elders of the locality, which is endorsed by the Patwari and sent the same to Deputy Commissioner Office for issuance of domicile.

After closing evidence of the parties, arguments of the counsel for the plaintiff and district attorney for the defendants heard.

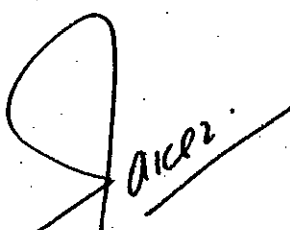
With the assistance of learned counsel for the parties, available record perused.

My issue-wise findings are as under.

Issues No 2


"Whether the plaintiff is estopped to sue?"

The burden of proving this issue is at the shoulders of the defendants, but no evidence is produced to prove the


Bakht Zada Khan
Civil Judge, Torghar
(T Ogra)

23.01.18


ATTACHED

Signature 
Date 14.2.18



applicability of estoppel against the plaintiff. Issue is

decided in negative.

Issue No 3

"Whether the suit is bad in its present form?"

Plaintiff is seeking declaration in respect of his domicile through the instant suit, which is maintainable in its present form. Issue is decided in negative.

Issue No. 4

"Whether this court has got jurisdiction to entertain the instant suit? "

The plaintiff is seeking declaration in respect of his domicile through the instant suit, which is civil in nature and this court has got ample jurisdiction to entertain the same. Issue is decided in positive.

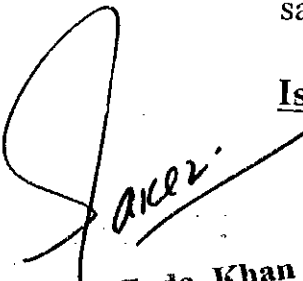
Issues No 5 & 6

"5. Whether the plaintiff is bona-fide resident of District Torghar and resulted into the issuance of domicile. If yes if effects?"

"6. Whether the domicile of plaintiff was rightly cancelled by the defendants? if yes its effects."

Both these issues are linked with each other hence taken together for discussion.

The plaintiff has alleged in his plaint that he is bonafide resident of district Torghar and his family has got about 3000 kanal property at district Torghar. That he was recruited as police constable at district Torghar on the strength of domicile of district Torghar. He later on


Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)

23-01-19


ATTACHED

Signature

Date 14-2-19



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was recruited as PST at district Torghar after verification of his domicile and that his domicile is canceled/unverified by the defendants without any notice to him on the ground of political influence.

In reply, defendants in their written statement have alleged that he is not resident of district Torghar. At district Torghar no settlement has been made and for issuance of domicile certificate, the attestation of two elders was required and the plaintiff was also issued the domicile certificate according to the said procedure. Defendants alleged that after getting appointment in education department, he could not prove to be resident of district Torghar and his domicile is declared as fake.

The plaintiff during his statement as PW-1 produced Ex:PW1/1, which is affidavit regarding verification of plaintiff's domicile. Ex:PW1/1 is duly signed and affirmed by Gul Taj Wali, member district council, union council Darbani, District Torghar. He also deposed as PW-2 and stated that he along with chairman village council Naseeb Rokhan has verified the plaintiff as bonafide resident of district Torghar and on the basis of which domicile was issued to the plaintiff. He further verified that plaintiff is resident of district Torghar and his domicile is canceled by the defendants. He also stated that some of elders of district Torghar made

Jacer
Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)
23-01-18

Signature *[Signature]*
Date *14.2.18*



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objection on the domicile of the plaintiff as their close relatives were on waiting list for recruitment and the said elders by one way or other got the consent of the member village council and took him to Assistant Commissioner, where his statement was again recorded and due to the pressure of the said elders, he resiled from his previous statement and on the basis of statement of said elders and member village council Naseeb Roukhan, domicile of the plaintiff was canceled by the Deputy commissioner without holding proper inquiry. PW-2 being member district council was cross-examined. He affirmed that Ex:PW1/1 is executed by him in favour of plaintiff to the effect that he is resident of Torghar and the same correctly bears his signature. PW-2 also affirmed being representative of the people of district Torghar that he personally knew the plaintiff as resident of District Torghar, because district Torghar is consisted of very small population and being member district council he knew almost all the families residing in Torghar. During cross examination, single question has not been asked by the district attorney regarding the interest of the elders and pressurizing member village council and non holding of proper inquiry by the defendants and this part of the statement of PW-2 remained unshattered.

Qaver

Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)
23-01-18

P-9
ATTESTED

Signature *[Signature]*

Date *14-2-18*



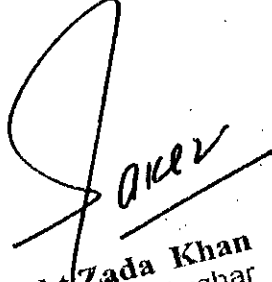
80

The criteria mentioned for issuance of domicile certificate by the defendants in their written statement and by DW-1 in his examination in chief is that an applicant for getting domicile certificate of district Torghar is required to verify from two elders of the locality that he is resident of district Torghar. On the basis of such verification by elders, patwari halqa further attests his application and sends the same to Deputy Commissioner for issuance of domicile.

In the case of the plaintiff, two witnesses Zardost Khan son of Umer Khan and Zareen Taj son of Shireen Taj have signed the application of the plaintiff under the following statement.

It is certified that Muhammad Usman son of Khitab Muhammad, caste Akazai Muhammaday is resident, since his forefathers, of Tehsil Kandar, District Torghar. His photo on the application form is verified. The domicile certificate is being issued to the petitioner at our verification.

After the above verification by two witnesses, the above statement is further verified and attested by two "Malakan" namely Malak Yaroz Khan son of Muhammad Miskeen (Qabail Rehnuma, District


Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)
23-01-19

ATTESTED

Signature

Date 14.2.19

51
Torghar) and Malak Bakhti Rawan Khan (Kand Akazai,
District Torghar).

On the verification of witnesses and attestation of
"Malakan"(prominent elders), patwari halqa has reported
that petitioner is by birth resident of District Torghar
since his forefathers.

After the said process, report of Tehsildar is
obtained and the same is countersigned by the District
Revenue Officer, Torghar.

The above process shows that plaintiff has duly
fulfilled the criteria mentioned by the defendants in their
written statement and DW-1 in his examination in chief.

It is proved from the statements of PWs that no
proper inquiry has been conducted by the defendants for
cancellation/verification of plaintiff's domicile. The
defendants in Para-3 of factual objections of their written
statement have also mentioned that

Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)
23-01-17

Signature: *[Signature]*
Date: 14/2/17



قرہ نمبر 3 ارضی دعویٰ کا جواب یہ ہے کہ ضلع تورغر غیر
بندوبستی ضلع ہے۔ کوئی ریونیو ریکارڈ موجود نہ ہے۔ ضلع ہذا میں
ڈومیسائل کے حصول کے لیے کسی بھی دو افراد کی تصدیق پر
ڈومیسائل جاری کیا جاتا تھا۔ مدعی کو بھی اسی طریقہ پر ڈومیسائل
جاری ہوا تھا تاہم بعد ازاں محکمہ تعلیم میں نوکری ملنے کے بعد
دوبارہ کی گئی تو اس میں مدعی تورغر کا باشندہ ثابت
نہ ہو سکا۔ جس کی بنیاد پر اس کا ڈومیسائل جعلی قرار دیا گیا۔ چونکہ

تورغر میں جعلی ڈومیسائل کے کیسز زیادہ ہیں اس لیے دوبارہ

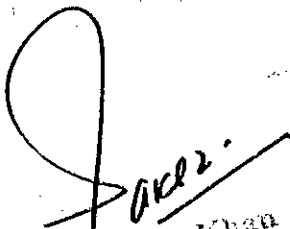
52
کی ضرورت پڑی۔

The above para clearly shows that no inquiry has been conducted and even for the verification process the plaintiff has not been given opportunity of hearing and producing evidence in support of his claim. As for as cancellation of domicile of the plaintiff by DC is concerned, the same has not been made in accordance with law. Reliance is placed on 1999 CLC 103 Lahore, which is reproduced below for ready reference.

Cancellation of Domicile Certificate.... District magistrate after issuance of domicile certificate became functus officio... magistrate by cancelling domicile certificate, had acted illegally and arbitrarily as no such power vested in him after issuing a domicile certificate.

b. district magistrate cancels domicile certificate without conducting any detailed inquiry or offering right of hearing to petitioner...effect...cancellation of domicile certificate had no legal justification without joining the petitioners in the inquiry and without obtaining any proof from them about their residence.

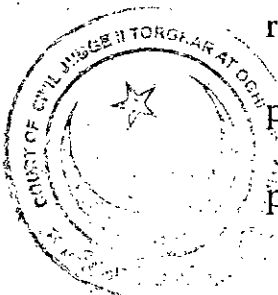
In the present case, the defendants have neither produced inquiry report nor any verification letter regarding domicile of the plaintiff. The domicile of the plaintiff is canceled/unverified without any notice to plaintiff and witnesses/verifiers, who are prominent


Balchi Zada Khan
Civil Judge (District)
23-01-18

ATTESTED

Signature

Date 14.2.18



Muhammad Usman Vs Deputy Commissioner, etc
Suit for Declaration, etc

Case file No. 93/1

Date of institution 26.01.2017

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elders of the locality. The plaintiff has not joined any inquiry.

The above mentioned facts and circumstances clearly indicate that domicile certificate was issued to the plaintiff after proper procedure, while the same has been canceled by the defendants in haste, without holding any inquiry and offering opportunity to the plaintiff for producing evidence and hearing.

The defendants have not initiated any criminal proceedings against the witnesses and verifiers and have not fixed responsibility upon the person, who allegedly have made fake verification for issuance of domicile to the plaintiff.

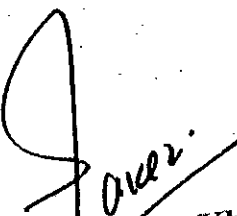
The plaintiff has produced copies of CNIC, of his mother and father on which permanent resident address of the plaintiff is mentioned as "Tehsil Kandar, District Torghar". No letter has been issued to the concerned authorities regarding wrong address in CNIC of parents of the plaintiff.

Issue No. 5 is decided in positive, while issue No. 6 is decided in negative.

Issues No. 1, 7, 8, 9 & 10

"1. Whether the plaintiff has a cause of action?"

"7. Whether the plaintiff is entitled for the decree of declaration as per prayer "Alif?"


Bakht Zada Khan
Civil Judge, Torghar
(et Dghl)
23-01-17

ATTACHED

Signature

Date - 14.02.17



54

"8. Whether the plaintiff is entitled for the decree of mandatory injunction as per prayer "Bai?"

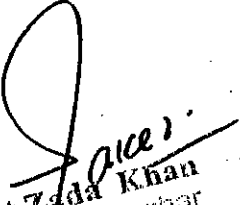
"9. Whether the plaintiff is entitled for decree of permanent injunction as per prayer "Jeem?"

"10. Whether the plaintiff is entitled for the decree as prayed for?"


As per my detailed discussion over issues No. 5 & 6, it has been proved that domicile certificate was issued to the plaintiff after fulfillment of criteria/adopting the procedure mentioned by the defendants in their written statement and as DW-1, but the same has been canceled by the defendants without holding proper inquiry and offering opportunity of producing evidence and hearing to the plaintiff; therefore, issues No. 1, 7, 8, 9 & 10 are decided in positive.

Relief

As sequel to my above issue-wise discussion, the plaintiff proved that domicile certificate was issued to him in accordance with the procedure mentioned by the defendants and after fulfillment of required criteria, while the same has been unverified/canceled without holding proper inquiry and offering opportunity of hearing to the plaintiff; therefore, decree for declaration, permanent injunctions, and mandatory injunctions is hereby granted in favour of the plaintiff against the defendants as prayed


Bakht Zada Khan
Civil Judge, Toghhar
(at Oghi)
23-01-18

Signature


Date 14-2-18

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for. No order as to costs. case file be consigned to the record room after necessary completion and compilation.

Announced:
23.01.2019

[Signature]

Bakht Zada Khan
Civil Judge-I, Torghar at Oghi

CERTIFICATE

Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)

Certified that this judgment consists of fourteen (14) pages. Each page has been read over, checked and signed after making necessary correction therein.

[Signature]

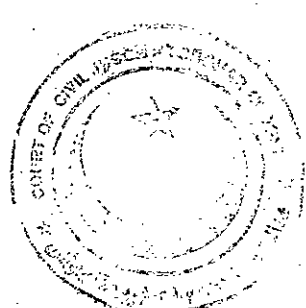
Bakht Zada Khan
Civil Judge-I, Torghar at Oghi

Bakht Zada Khan
Civil Judge, Torghar
(at Oghi)

23-01-19

[Signature]

Signature
[Signature]
23-01-19



برجہ ڈگری

لہذا اب مولا حج صاحبہ کو رخصت مقام اودھی

مقدور 93/1 روضہ 26/17 شہر سوران 13/17 قسطنطنیہ 23/17

محمد عثمان ولد خطاب محمد حرم حصار کھوٹ وال تنگہ محمدی اگاز علی

کنڈر فیلو لائسنس

— صدیقی —

بناج

P 16

Signature: [Signature]
Date: 14/2/1936

1- ڈپٹی کمشنر فیلو لائسنس

2- اسٹیشن ماسٹر فیلو لائسنس

3- عقیدتدار تحصیل کنڈر لائسنس

4- گوردوارہ سرکل کنڈر لائسنس

5- بیٹواری حلقہ محمدی اگاز علی وال درہنی تحصیل کنڈر لائسنس

6- اسٹیشن ڈائری کنڈر لائسنس گوڈنٹ فیلو لائسنس

سکریٹری / نا درہنی کنڈر لائسنس

— مدعا علیہم —

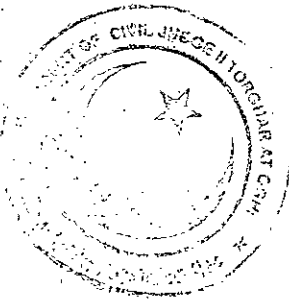
لہذا - دعویٰ عوارضہ و ڈگری استوار حق نہ بین و ارداد کہ مدعی

محمد عثمان ولد خطاب محمدی حرم حصار کھوٹ وال محمدی اگاز علی

بادی ارداد سے فیلو لائسنس تحصیل کنڈر لائسنس یا سندہ ہے اور

چیک مدعا علیہم نیز ایک طرف سے جاری کردہ لائسنس

Gen (2016) DC/179/1936 حررہ 30/2/16 بابت لیسٹریٹ ڈومیسائل
مدعی کی مدد تک سلسلہ نمبر 145 ملوں، مقدمہ و قانون، مقدمہ واقعات



Plaintiff
new

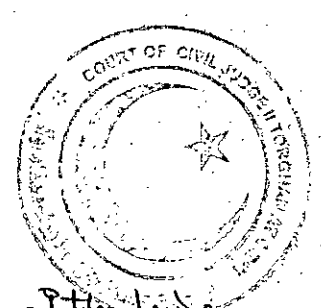
اور حقوق مدنی پر باطل کا لٹرم و بے اثر ہے۔ جبکہ مدعا علیہم پر
کاؤنٹرائٹڈ سے بہتر دیکھ کر مدعی کی کاٹیکہ 27/12/2019 کو بال کر رہی ہے
لیوریٹ مشاغل نیٹو میاٹری کے بقا مدعی کی فٹلج کوڈر سے جانا کر رہی ہے

ب دعوے جواد صدور ڈگری حکم افتاحی تاکیدی پر فٹلج مدعا علیہم کر رہی ہے
کاؤنٹرائٹڈ کو نیٹو میاٹری کا راکر بریا یا لیوریٹ دیگر پر ان ڈوٹ
فر 27/12/2019 کو بال کر رہی ہے

ج دعوے جواد صدور ڈگری حکم افتاحی دواہی پر فٹلج مدعا علیہم
کر رہی ہے کو فٹلج کوڈر سے باہر دیگر کی کو فٹلج و علاقہ مد
کاٹیکہ اور اندراجات کرن سے فٹلج علی الدوام فٹلج بار
ہاٹ بٹن کا کوڈر فٹلج و فٹلج

200/-

Signature
Date 15.2.19



Order: 35

27.01.2019, plaintiff in person along with his
Counsel present. Defendants are represented by
Clerk of district attorney

Arguments already heard and record
perused. A very detailed issue-wise judgment
Consisted of fourteen pages (14) pages the plaintiff
proved that domicile certificate was issued to him in
accordance with the procedure mentioned by the
defendants and after fulfillment of required
Criteria, while the same has been unverified/
Canceled without holding proper inquiry and

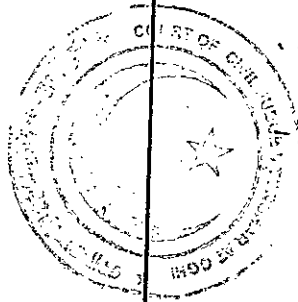
obbing opportunity of hearing to the plaintiff
 therefore decree for declaration permanent

5) Injunctions and mandatory injunctions is
 hereby granted in favour of the plaintiff
 against the defendant as prayed for;
 No order as to costs. Case file be consigned to
 the record room after necessary completion and
 compilation.

Announced;

23.01.2019.

درخواست کنندہ	موضوع	فرج ناز	مدعی
P 130 NIL	1- لائیت کا اعلان 2- اسٹاپ چھوڑنے دلوگ 3- اسٹاپ فریج م 4- اسٹاپ وکالت م 5- حقیقتانہ دیکھو 6- فی ایل ایل 7- فرج گوانا 8- فی اسٹاپ 9- فریج طلبانہ 10- مستحق	NIL	
"	"	میزان	"



25 تاریخ جوڈیکل مقررہ سال 2019ء میں درج ذیل میں اور دیگر عدالتوں کے ساتھ

Barakat Zada, Khair
 Civil Judge, District
 (at Ogahi)

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 29.1.19
 14-2-19



وکالت نامہ

کورٹ فیس

BEFORE THE K.P.K SERVICE TRIBUNAL. بعدالت

عنوان: MUHAMMAD USMAN بنام Govt of K.P.K & others

APPELLANT

منجانب:

APPEAL

نوعیت مقدمہ:

باعث تحریر آنکھ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آن مقام

HAMA YUN KHAN ADVOCATE HIGH COURT ABBOTABAD

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داخستہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ دہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا جمد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست، براد استجارت ناشر، بصیختہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقام: 14 Dec 2016

ABBOTABAD

بمقام:

Attested &
Accepted by
[Signature]
Adv.

محمد علی ذولہ صلاب علی

[Signature]

ایم ایٹ

(99) 419

BEFORE THE HONARABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Appeal No. # 1243-A/2016

Muhammad UsmanAppellant

VERSUS

Govt. Khyber Pakhtunkhwa through Secretary Education, KPK Peshawar & Others..... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS

UNDER:

INDEX

S.No	Particular of Documents	Annexure	Pages
1	Parawise comments along with affidavit		1-5
2	Copies of the letters of Deputy Commissioner Torghar dated 30-08-2016 and 18-08-2016	"A" and "B"	6-9
3	Copy of letter to Deputy Commissioner Tor Ghar dated 31-05-2016	"C"	10

Respondent NO 3

(148)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Appeal No. # 1243-A/2016

Muhammad UsmanAppellant

VERSUS

Govt. Khyber Pakhtunkhwa through Secretary Education, KPK Peshawar &
Others..... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS

UNDER:

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:

1. That the Appellant has got no cause of actions/locus standi.
2. That the instant appeal is filed by suppressing the material facts from this honorable Tribunal, hence not maintainable.
3. That the appellant Domicile certificate was already forwarded to authority concerned (Deputy Commissioner Tor Ghar) for verification purpose and as per letter No. AC(2016)/TG 2792-93 dated 18-08-2016 and letter No. Gen(2016)/DC/TG 1936 dated 30-08-2016 Issued by Deputy Commissioner Tor Ghar his Domicile was declared Fake/unverified, as per term and condition No.5 of the appointment order, his appointment was withdrawn by respondent No.3
4. That the instant appeal is against the prevailing law & rules.
5. That the instant appeal has been filed just to pressurize the respondents.

(40) (39) (13)

6. That the appellant has not come to this honorable tribunal with clean hands.
7. That this honorable tribunal lacks jurisdiction in the instant matter in issue.
8. That the instant appeal is hopelessly time barred.
9. That the appeal is bad for Mis-joinder and non-joinder of the necessary parties.
10. That the appellant is estopped to sue through his own conduct.

FACTS

1. That Para No-1 needs no comments, being pertains to the academic record of the appellant.
2. That para No 2 needs no comments, being pertains to the service record of the appellant.
3. That para No.3 of Appeal is subject to proof.
4. In reply to Para No. 4 it is stated that, All terms & conditions are duly mentioned in advertisement annexed.
5. That para No. 5 is correct to the extent of submission of documents.
6. That para No.6 is correct, that the appointment was made subject to verification of Domicile certificate and other credentials.
7. That para No.7 relates to appellant service career, hence correct and no comments.
8. In reply to para No.8 it is submitted that the appellant Domicile certificate was already forwarded to authority

39/18

concerned (Deputy Commissioner Tor Ghar) for verification purpose and as per letter No.Gen(2016)/DC/TG 1936 dated 30-08-2016 and letter No.AC(2016)/TG 2792-93 dated 18-08-2016 issued by the Deputy Commissioner Tor Ghar, his domicile certificate was declared fake/unverified, as per terms & conditions of the appointment order, his appointment was withdrawn by respondent No.3

(Copies of said letters are annexed as annexure A , B & C respectively)

9. That Para No. 9 is incorrect; as such no proof has been annexed for filing of departmental appeal.
10. Incorrect, as per reply given in Para No.9 above.


GROUNDS

- A) That Para no "A" of the ground is incorrect, the order/ notification dated 07-09-2016 was passed, as a result of the letters of the Deputy Commissioner Tor Ghar after proper verification and other legal proceedings under rules & regulations of the Department.
- B) That Para No. B of the ground as composed is incorrect. As per term & condition No. 5 of the appointment order, there is no need of issuance of notice to the appellant.
- C) Incorrect, as per reply given in Para No.B above.
- D) In reply to para No .D of the ground, it is submitted that denotification/ withdrawal order was issued as per term & condition No.5 of his appointment order.
(Copy of appointment order has already been annexed).
- E) That complete and comprehensive reply has already been given in preceding paras.

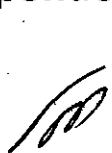
- F) That impugned order was passed, after proper verification and other legal proceedings under rules & regulations of the Department.
- G) Incorrect, as per reply given in para No. B above.
- H) In reply to para H it is stated that it was the duty of the appellant to come to the Department with clean hands rather he concealed the material facts from the Department .
- I) No comments.
- J) That the respondents seek permission to argue further points at the time of hearing.

It is therefore; in the light of above stated facts & circumstances most humbly prayed that the instant appeal may kindly be rejected/dismissed with cost.

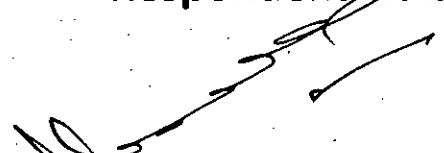
Respondent: No.1


**Secretary Education
(E&SE) Peshawar.**

Respondent No. 2


15/8
1507
**Director Education
(E&SE) Peshawar**

Respondent No.3


**District Education Officer (Male)
District Tor Ghar.**

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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Appeal No. # 1243-A/2016

Muhammad UsmanAppellant

VERSUS

Govt. Khyber Pakhtunkhwa through Secretary Education, KPK Peshawar & Others..... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS

UNDER:

AFFIDAVIT

I, Mr, Khan Muhammad DEO^(CM) District Torghar, do hereby solemnly affirm on oath, that the contents of Parawise comments are True & Correct in the best of my knowledge & belief and nothing has been concealed or suppressed from this honorable tribunal.


DEPONENT



17/10/2017

AMX
"A"

OFFICE OF THE DEPUTY COMMISSIONER
DISTRICT TORGHAR

No.Gen(2016)/DC/TGI/1936
Dated Torghar the 30.08.2016

To
The District Education Officer
Torghar.

Subject: **DOMICILE VERIFICATION**

Reference your office letter No. dated: (P-44)

27464/30-8-16



continuation of this office letter No.583 dated:02-03-2016. Verification report in respect of Tehsil Kandar Hassanzai is forwarded for further necessary action, please.

S.No	Village council	Name	Father Name	Place of domicile	Verified/unverified	Remarks
01	Tegram	M. Suleman	Abid Khan	Kungar	Verified	
02	-do-	Abdullah	Mehmood Rahman	Ur	Verified	
03	-do-	Ihrar Ahmad Khan	M. Farosh Khan	-do-	Verified	
04	Karoon Hassanzai	Said Alain Khan	Munawar Khan	Seri Kohani	Verified	
05	-do-	Israr Ahmad	Muhammad Farosh Khan	-do-	Verified	
06	-do-	Mohibullah	Ghulam Bahadur	Reel HZ	Verified	
07	Tilli Hassanzai	Sahib Zar Khan	Said Bakht Shah	Tilli	Verified	
08	-do-	Mohsin Ali Shah	Liagat Ali Shah	-do-	Verified	
09	-do-	Saleem Shah	Hanif Shah	-do-	Verified	
10	-do-	Mehtab Shah	Khitab Shah	-do-	Verified	
11	-do-	Muhammad Arifin	Muhamad Tahir	-do-	Verified	
12	-do-	Zahid Khan	Said ullah Khan	-do-	Verified	
13	-do-	Bakht Munir Shah	Nasib Zar Shah	-do-	Verified	
14	-do-	Muslim Shah	Taj Muhammad Shah	-do-	Verified	
15	Kandar Hassanzai	Yousuf Gul	Sahib Gul	Kotkey Hassanzai	Verified	
16	-do-	Fazal Sadiq	Abdul wahab	-do-	Verified	
17	-do-	Naseebullah	Jahanzaib	-do-	Verified	
18	-do-	Miss. Saima	Muhammad Munir	-do-	verified	
19	-do-	Naseerullah	Jehanzaib	-do-	Verified	
20	-do-	Muhammad Azam Khan	Samandar Khan	-do-	unverified	
21	Palosa Hassanzai	Raqeebullah Khan	Amin Khan	Kunjo Hassanzai	Verified	
22	-do-	Suleman Khan	Yakmeen Khan	-do-	Verified	
23	-do-	Muhammad Riaz	Karim Shah	Palosa HZ	Verified	
24	-do-	Muhammad Zahid	Muhamamad Nasib Khan	-do-	verified	
25	-do-	Faizu Ur Rehman	Abdur Rehman	-do-	Verified	
26	-do-	Niamat Rehman	Gul Umar Dad	-do-	Verified	
27	Gari HZ	Fazal Nawaz Khan	Mir Nawaz Khan	New Keley HZ	Verified	
28	-do-	Faiz ur Rehman	Sahib Rehman	Gari HZ	Verified	
29	-do-	Abdul Jilil	Abdul wahid	-do-	Verified	
30	-do-	Muhammad Iqbal	Muhammad Laig	-do-	Verified	
31	Bio HZ	Gul Nabi Shah	Alamza Ali Shah	Karna HZ	Verified	
32	-do-	Rehman Chani	Sakni Bahadur	-do-	Verified	
33	-do-	Muhammad Asif Khan	Gul Wahid Shah	-do-	Verified	

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34	-do-	Jehanziab Khan ✓	Farid Khan	Kunjo Hz	Verified
35	-do-	Abdul Sadiq ✓	Nasim Khan	Bio HZ	Verified
36	-do-	Ashfaqullah ✓	Zarin Khan	-do-	Verified
37	Bimble Akazai	Kifayatullah ✓	Muhammad Tahir	Mera Akazai	Verified
38	-do-	Abdul Raheem	Miskeen Khan	-do-	Verified
39	-do-	Rozamin Khan ✓	Malik Said	Khadang Akazai	Verified
40	-do-	Zar Muhammad ✓	Imam Khan	-do-	Verified
41	-do-	Khateeb Shah ✓	Mubarak Shah	-do-	Verified
42	-do-	Mumtaz Khan ✓	Ajmal Khan	-do-	Verified
43	-do-	Raheemullah	rehmatullah	-do-	Verified
44	-do-	Gulabzada ✓	Naseeb Zada ✓	-do-	Verified
45	-do-	Sadiq Zar ✓	Gulazar	-do-	Verified
46	-do-	Irshadullah ✓	Habibullah	-do-	Verified
47	-do-	Abdullah ✓	Taluq iKhan	-do-	Verified
48	-do-	Yousuf Shah ✓	Rozi shah	-do-	Verified
49	-do-	Ameer Khan ✓	Muhammad Khan	-do-	Verified
50	Kand Akazai	Shahidullah	Sheikh khan	Kopra Akazai	Verified
51	-do-	Syed Asadulah Shah	Sabit Rasool	Zungley Akazai	Verified
52	-do-	Abdul Rehman	Shahzada Rasool	-do-	Verified
53	-do-	Fazal Nawab	M. Ismail	Dhoro Akazai	unverified
54	-do-	Shahid Husain	Abdul wahab	Kopra Akazai	unverified
55	-do-	Zahid Husain	Abdul wahab	-do-	unverified
56	-do-	Al Adi	Gul Malak	-do-	unverified
57	-do-	Azizullah	Shah zar	-do-	unverified
58	-do-	Safi Ullah ✓	Abdul Rauf	-do-	unverified
59	Manjakot Madakhel	Abdul Manan ✓	Muhammad Ayub	Manjakot	Verified
60	-do-	Inamul Haq ✓	Saib Shah	-do-	Verified
61	-do-	Nazmeen Khan ✓	Shah Farid	-do-	Verified
62	-do-	Abdul Razaq	Rozi Rehman	-do-	Verified
63	-do-	Maqbool shah ✓	Skhi Shan	-do-	Verified
64	-do-	Shazia bibi	Khalid Khan	-do-	Verified
65	Karor Madakhel	M. Ibrahim ✓	Nasrullah Khan	karor	Verified
66	-do-	Irfan ullah ✓	Waris Khan	-do-	Verified
67	-do-	Sher Muhammad zar ✓	Muhamad Afzal	-do-	Verified
68	-do-	Zar Khiab Gul ✓	Sakhi Mat Gul	Do	Verified
69	-do-	Imam Gul ✓	Behram Gul	Do	Verified
70	-do-	Zakir Khan ✓	Nazar khameed khan	Do	Verified
71	-do-	Rokhaib gul ✓	Sakhi mat gul	Do	Verified
72	Chund Mada Khail	Wakeel Khan	Faqeer Muhammad	Sulmanav	Verified
73	-do-	Hazrat Islam	Hazrat Gul	-do-	Verified
74	-do-	Zeher Khan	Umar said	Dadam	Verified
75	-do-	Wahid gul	Qemat gul	Do	Verified
76	-do-	M Zada	M Haneef	Do	Verified
77	Do	Bakhti zar said ✓	Nawab said	Do	Verified
78	Do	Khabib said	M said	Do	Verified
79	Do	Amen said	Qeenat said	Charakot	Verified
80	Tetay mada khail	Zar Muhammad Shah	M. Shan	Diio	Verified
81	Do	Ibrahim ✓	Sabit iKhan	Do	Verified
82	Do	Ijaz Muhammad	Ameri Khan	Tetay	Verified
83	Do	Nor Ul Amin	Said Malik Khan	Do	Verified
84	Do	Ehsan Ullah	Ata Muhammad	Do	Verified
85	Do	M Said	Gul Shan Said	Do	Verified
86	Do	Abdullah	Hameed Ullah	Mabra	Verified
87	Mera Mada Khail	M Haneef ✓	Falas Khan	Mera Mada Khail	Verified
88	Do	Abdul Rehman	Woor SHareef	Do	Verified
89	Do	Mohib Ullah	Ohmadar Khan	Do	Verified
90	Do	Abdul Baseer Khan	Said Zar Khan	Do	Verified
91	Do	M Shoaib	Zameen khan	Do	Verified
92	Do	Saeed Rehman ✓	Said Munammad	Do	Verified
93	Do	Zar Muhammad ✓	Wala jan	Do	Verified
94	Do	Abu Bakkar ✓	Lal Shareef	Do	Verified
95	Do	Gul Zar	Zar dad Ullah khan	Do	Verified
96	Do	Zarnab	Said mar Gul	Do	Verified
97	Do	Nagash Gul Bi bi	Shareen Gul	Do	Verified
98	Do	M. Salay ✓	Wazeer Muhammad	Do	Verified
99	Do	Yasir Ayaz Khan	Tanam Jan	Do	Verified
100	Do	M Younis	M Rasool	Do	Verified

	Do		Sami Ullah	Sarbaz Dad	Do	Verified	
	Do		Usman	Gulab Zar	Do	Verified	
	Do		Yaas Muhammad ✓	M Zubaid Khan	Do	Verified	
	Do		Wahid Ullah	Nazeer khan	Do	Verified	
105	Do		Sahib Zar	Alaf Zareen	Do	Verified	
	Kalsuna Khail	Mada	Hussain Ahmad	Aziz Rehman	Churd	Verified	
107	Do		Samar Sher ✓	Asim Khan	Do	Verified	
108	Do		M Ismail ✗	Bakht zada	Do	unverified	(Appointed)
109	Do		Zafar Ullah ✓	Shehzada	Ghari Mada Khail	Verified	
110	Do		Ibrahim	Taj Muhammad Khan	Do	Verified	
111	Do		Sadia	Fazal said	Do	Verified	
112	Do		Alaf said	Haleem ullah	Do	Verified	
113	Do		Rehman ullah ✓	M Haneef	Do	Verified	
114	Do		Muniar zada	Sheikh zada	Do	Verified	
115	Do		Behrullah ✓	Sher zada	Do	Verified	
116	Do		Tahir Muhammad ✓	Baaz Muhammad	Do	Verified	
117	Do		Atta Ullah	M Reman	Do	Verified	
118	Do		M Umair	Said Qayum	Sonia Mada Khail	Verified	
119	Do		Zar Wahid khan	Imam khan	Do	Verified	
120	Do		Faisal ✓	Yaad Ullah	Do	Verified	
121	Do		Abdul Rasheed	Noor. Mohammad Khan	Do	Verified	
122	Gowandla Khail	Mada	Miss. Razia	Momin Khan	Gowandla Mada Khail	Verified	
123	Do		Siraj Ullah ✓	M. Arif	Do	Verified	
124	Do		Anwar Zaib ✓	Shah Hussain	Do	Verified	
125	Do		Hayat Muhammad	Hakeem Shah	Do	Verified	
126	Do		Muhammad Jamil	Umar Saeed	Do	Verified	
127	Do		Meraj Mehmood ✓	Wazir Ur Rehman	Do	Verified	
128	Do		Fazal Amin	Muhammad Ayub	Do	Verified	
129	Do		Muhammad Salih	Muhammad Tahir	Do	Verified	
130	Do		Khuwaj Muhammad	Muhammad Ashraf	Do	Verified	
131	Do		Ameer Muhammad	Rehmat Sadique	Zilargy mada khail	Verified	
132	Do		Shahid Ur Rehman	Shah rasool	Do	Verified	
133	Do		Ahsan	Shafi Ur Rehman	Do	Verified	
134	Do		Waheed Ur Rehman	Ali Rehman	Do	Verified	
135	Do		Parvaiz khan	Farid Ullah	Do	Verified	
136	Do		Tawas khan	Sher khan	Do	Verified	
137	Do		Khan Muhammad	Fareed ullah	Do	Verified	
138	Do		Zubair wahab	Shair Muhammad	Do	Verified	
139	Do		Waris khan	Roshan khan	Badar mada khail	Verified	
140	Do		Muhammad shahid ✓	Sheikh fareen	Do	Verified	
141	Do		Fazal Malik	Qabal Khan	Kot mada khail	Verified	
142	Darbani Aka Zai		Mastoreen ✓	Maim krian	Darbani	Verified	
143	Do		Majid khan ✓	Sahaid wali	Do	Verified	
144	Do		Bakht zareen	Ghulab zareen	Do	Unverified	
145	Do		M Usman ✓	Khitab Muhammad	Do	Unverified	Appointed
146	Do		Abdul jaleel ✓	Abdul ghaffar	Do	Unverified	Appointed
147	Kand Akazai		Syed Farman Ullah Shah ✓	Syed Usman Ullah Shah	Dharoo Akazai	Unverified	Appointed
148	Ghari Hassan Zai		Akhter Muhammad ✓	Yaqeen Khan	Nadray Hassan Zai	unverified	Appointed

(Signature)
Deputy Commissioner
Torqhar

ANX-B

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Office of the Assistant Commissioner, Judba
District Torghar
No. AC/2016/TG 2792-93
Dated Torghar the 18/08/2016

To
The District Education Officer (Male)
Torghar.

Subject: VERIFICATION OF DOMICILE CERTIFICATES & CANCELLATION/WITHDRAWAL OF APPOINTMENT ORDERS UPON VERIFICATION OF DOMICILES.

Memo:
I am directed to refer your office letter No. 1593 dated: 31.05.2016 on the subject cited above and to state that as per direction of the worthy Deputy Commissioner Torghar that all the unverified domicile certificates may be considered as unverified/fake.

[Signature]
Assistant Commissioner
Judba Torghar

Encl: No. & Date Even:
Copy to the Deputy Commissioner Torghar for information, please.

[Signature]
Assistant Commissioner
Judba Torghar

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Annex



OFFICE OF THE DISTRICT EDUCATION OFFICER (M&F) TORGHAR

Ph. 0345-6660087 Fax. Nil
Email. torgharemis@gmail.com

No. 1593
Dated: 31/05/2016

(8)

To

The Deputy Commissioner,
District Tor Ghar

Subj:

VERIFICATION OF DOMICILE CERTIFICATES & CANCELLATION/WITHDRAWAL OF APPOINTMENT ORDERS UPON VERIFICATION OF DOMICILES.

Mems,

Reference your letter No.1223/DC (2016)/TG dated 09-05-2016 and letter No. 1062-66 AAC (R)(JUDBA)/TG Dated Torghar the 24-05-2016 received from Additional Assistant Commissioner (Revenue) Torghar (copy attached) in c/w the subject captioned above.

It is humbly stated that;

1. In para-5 of the appointment Notification Endst: No. 919-28/Dated Torghar April 9, 2016 it has been stated that "The appointments are subject to the condition that their certificates/documents & domiciles be verified from the concerned authorities by the DEO(M), anyone who found producing fake/bogus documents shall be dismissed from service and the case will further be reported to the law enforcing agencies for action under the relevant law & the domiciles then sent to your good self for verification or otherwise.
2. The reply received from your good end vide your letter No.1223/DC (2016)/TG dated 09-05-2016 declaring 27 domiciles as unverified & not as fake/bogus, means the said unverified declared domiciles can be declared verified at some later stages as in case of Mr. Muhammad Adil & Mr. Abdul Waheed who's domiciles once declared unverified & later on declared verified vide your office letter No. Estab/DC(2016)/TG/1468 dated Torghar the 26-05-2016.
3. In view of the above it is requested to kindly communicate the details of all such domiciles as fake/bogus rather than unverified please to peruse the case further as per rule.
4. Also please send the remaining pending domicile verification report for further necessary action please.

District Education Officer (M&F)
Tor Ghar

Endst: No. 1594-95 dated 31/5/2016.

Copies submitted for information & necessary action to;

1. P.A to Director E&SE KP, Peshawar
2. Additional Assistant Commissioner (Revenue) Torghar
3. Office File

District Education Officer (M&F)
Tor Ghar

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