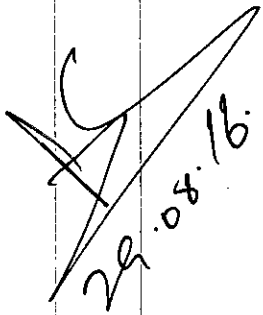


Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1.	29.08.2016	<p data-bbox="893 365 917 403">3</p> <p data-bbox="479 491 1323 541"><u>BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR</u></p> <p data-bbox="747 617 1063 655">Appeal No. 1247/2013</p> <p data-bbox="519 693 1307 768">Mst. Rahmida Versis Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar etc.</p> <p data-bbox="576 819 763 856"><u>JUDGMENT</u></p> <p data-bbox="544 894 1323 932"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:-</u></p> <p data-bbox="479 970 1339 1096">Counsel for the appellant and Mr. Usman Ghani, Senior Government Pleader for respondents present.</p> <p data-bbox="479 1209 1339 1814">2. Mst. Rahmida D/O Bakht Ali Jan hereinafter referred to as the appellant has preferred the instant service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against impugned orders dated 08.6.2012 and 25.10.2012 vide which her appointment order was withdrawn and where-against her departmental appeal was dismissed constraining the appellant to prefer the instant service appeal on 15.08.2013.</p> <p data-bbox="479 1927 1339 2305">3. Learned counsel for the appellant has argued that appointment order of the appellant was withdrawn on the allegations of fake and bogus Secondary School Certificate(SSC). That no show cause notice was ever issued to the appellant and as such she was condemned unheard.</p>

Handwritten signature and date:

 29.08.16.

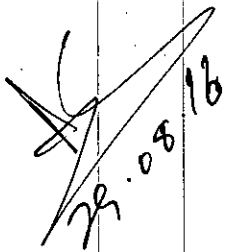
4. Learned Government Pleader has argued that the Board of Intermediate and Secondary Education (BISE), Bannu has declared the said certificate of SSC as fake and bogus and as such the appointment order of the appellant was correctly withdrawn by the competent authority.

5. We have heard arguments of the learned counsel for the parties and perused the record.

6. The appellant claims that her certificate of SSC is neither fake nor bogus while the respondents claim that the same was found fake and bogus after verification from the BISE, Bannu.

7. We are of the considered view that before passing impugned order it was desirable and required from the respondents to have afforded an opportunity of hearing to the appellant where-after the authority should have passed any order deem appropriate.


8. Since no opportunity of hearing has been extended to the appellant as such we are of the view that she was condemned unheard. We are, therefore, constrained to accept the instant service appeal, set aside the impugned orders referred to above and reinstate the appellant in service with directions to the competent authority to afford an opportunity of hearing to the appellant in the prescribed manners and

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there-after pass orders deem appropriate within a period of one month from the date of receipt of this judgment. Parties are left to bear their own costs. File be consigned to the record room.


(Muhammad Azim Khan Afridi)

Chairman


(Pir Bakhsh Shah)

Member

ANNOUNCED

29.08.2016

02.05.2016

Counsel for the appellant and Asst:AG for respondents
present. Counsel for the appellant requested for adjournment. To
come up for arguments on 29/8.2016.

Member

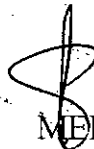


Member



6.2.2015

Counsel for the appellant, M/S Javed Ahmed, Supdt. for respondent No. 1 and Sher Bahadar, Assistant on behalf of respondent No. 2 alongwith Addl: AG present. Written reply has not been received on behalf of the respondents and request for further time made on their behalf. To come up for written reply on 29.4.2015.



MEMBER

10 29.04.2015

Counsel for the appellant and Mr. Farzand Ali, Assistant (lit.) alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 28.10.2015.



Chairman

28.10.2015

Clerk to counsel for the appellant and Asst: AG for respondents present. Rejoinder on behalf of the appellant submitted, copy whereof is handed over to the respondent-department. To come up for arguments on 2-5-16

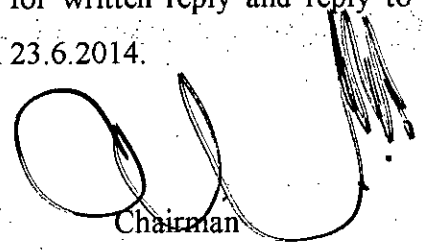


Member

6

26.3.2014

Counsel for the appellant and Mr. Javed Ahmad, Supdt. for respondent No. 1 with Mr. Usman Ghani, Sr. GP for the respondents present. Written reply and reply to application for condonation of delay have not been received. To come up for written reply and reply to application for condonation of delay on 23.6.2014.

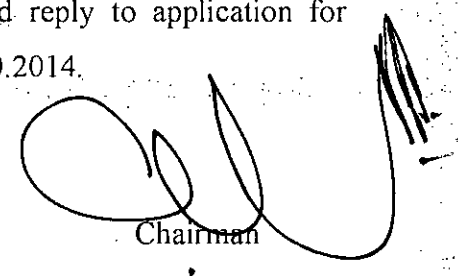


Chairman

7

23.6.2014

Counsel for the appellant, M/S Sajjad Rashid, AD for respondent No. 1 and Ashrafullah Khan, ADO(Lit.) for respondents No. 2 to 4 with AAG present. Written reply has not been received. Representatives of the respondents and learned AAG requested for further time on the ground that written reply has been prepared only on behalf of respondent No. 2, which requires vetting, and that all the respondents would be filing a joint written reply. Another chance is given for written reply/comments and reply to application for condonation of delay, positively, on 16.10.2014.

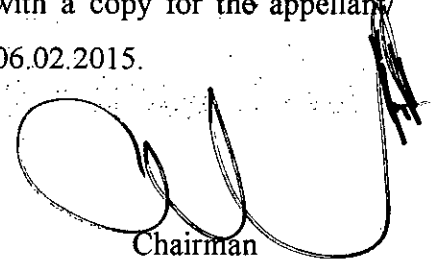


Chairman

8

16.10.2014

Counsel for the appellant, M/S Mosam Khan, AD for respondent No. 1 and Ashrafullah, ADO (lit.) for respondents No. 2 to 4 with Mr. Muhammad Adeel Butt, AAG present. Written reply has not been received despite another chance given for the purpose on the previous date. The learned counsel for the appellant objected to yet another adjournment for written reply on the request of the respondents. Therefore, a last chance is given for written reply/comments on behalf of the respondents, before the date fixed, with a copy for the appellant's counsel for the appellant for rejoinder on 06.02.2015.



Chairman

Appeal No. 1247/2013,
Mst. Fahmida.

3 -

21.11.2013

Mr. Saeed Khattak, Advocate present and filed Wakalat

Nama on behalf of the appellant. He requested for time. To come up for preliminary hearing on 31.12.2013..


Member

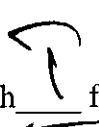
4
31.12.2013

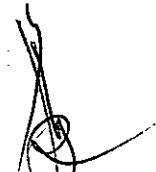
Mr. Muhammad Zarif Khan, Attorney for the appellant alongwith counsel for the appellant present and filed one set of amended appeal which is placed on file. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. The impugned final/appellate order has been issued in violation of Rule-5 of the Civil Servant (Appeal) Rules-1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 26.03.2014. Appellant has also filed an application for condonation of dely. Notice of application should also be issued to the respondents for reply/arguments on the date fixed.

Appellant Deposited
Security & Process Fee
Rs. 200/- Bank
Receipt is Attached with File.



31.12.2013

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

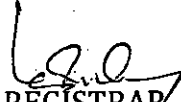


Member


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1247/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	23/08/2013	<p>The appeal of Mst. Rahmida resubmitted today by Mr. Umar Zad Shah Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	3-9-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>21-11-2013</u></p> <p style="text-align: right;"> CHAIRMAN</p>

IN THE K.P.K. SERVICE TRIBUNAL, PESHAWAR.

Amended Appeal
In
Service Appeal No. ¹²⁴⁷ / 2013

MST. RAHMIDA

VS

DIRECTOR & OTHERS

INDEX

S. No	Description of Documents	Annexure	Pages
01	Memo of Appeal		1 - 4
02	Petition for condonation of delay		5
03	Appointment order + Arrival Report	A & A/1	6 - 10
04	Academic Certificates	B	11 - 17
05	Cancellation / withdrawal order	C	18
06	Departmental Appeal	D	19 - 20
07	Impugned Order dated 8/6/2012	E	21
08	Appeal to Commissioner & Order on the same	F F/1	22 - 25
09	Application Form	G	26
10	Verification Certificate	H	27

#1251
15-8-13
Revised to
31-12-2013

Muhammad Saeed Khattak
Appellant

Through

Muhammad Saeed Khattak
Advocate, Peshawar

Muhammad Saeed Khattak

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBHNAL,
PESHAWAR**

Amended Appeal

IN

Service Appeal No: ¹²⁴⁷~~117~~/2013

Mst. Rahmida D/O Bakht Ali Jan R/O Village Mushar Daud , Bannu
.....Appellant

VERSUS

1. Director, Elementary & Secondary Education, Government of Khyber Pakhtunkhwa, Peshawar
2. Executive District Officer (Female), Elementary & Secondary Education, Bannu
3. District Coordination Officer now Deputy Commissioner, Bannu
4. District Officer (Female), Elementary & Secondary Education, Bannu.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER DATED 25/10/2012 PASSEED BY RESPONDENT No.3, VIDE WHICH DEPARTMENTAL APPEAL OF THE APPELLANT AGAINST CANCELLATION / WITHDRAWAL OF HER APPOINTMENT ORDER PASSED BY RESPONDENT No. 4 WAS DISMISSED VIDE ORDER DATED 08/06/2012.

PRAYER IN APPEAL

On acceptance of the instant Service Appeal the impugned order dated 25/10/2012 on departmental appeal against the order dated 08/06/2012 may kindly be declared as illegal, unlawful, without lawful authority and direction may kindly be issued to the concerned respondents for her re-instatement with all back benefits.

Respectfully Sheweth,

1. That the appellant was appointed as Primary School Teacher {PST} in BPS 07 vide order No. 4192-4288/AE-1/Female PST/2012, dated 23/04/2012 by Respondent No, 2 and was posted in GPS Piran Daud Shah {Annexure A}, thereafter she took charge of her duties on 24/04/2012. {Annexure A/1}.

2. That the appellant was appointed on merit basis as per her educational qualifications. {Copies of the educational certificates are attached as annexure B}.
3. That vide order dated 08/06/2012, the Respondent No.4 cancelled/withdrew her appointment order illegally, unlawfully and without any lawful authority for not being competent authority. {Copy of the order is attached as annexure C}.
4. That being aggrieved of the same the appellant submitted a departmental appeal before Respondent No.3 {Annexure D}, which was dismissed vide impugned order dated 25/10/2012 {Anexure E}.
5. That the appellant then preferred an appeal before the Commissioner Bannu, which met the same fate. {Copies of the appeal and order on the same are attached as annex F & F/1 respectively}.
6. That being aggrieved the appellant prefers the instant service appeal, inter alia, on the following amongst others:

GROUND:

- A. That the impugned order is illegal, unlawful and passed in a haphard manner and is totally based on presumption without consulting the material available before him as well as totally ignored the fact that appellant's appointment was canceled/withdrawn by incompetent authority without following the procedure laid down by law as well as the same is passed in violation of Rule 5 of the k.p.k. Civil Servants {Appeal} Rules, 1986.
- B. That appellant submitted her genuine academic certificates along with application form {Annex G, the geniuses of the certificate has been authenticated by Respondent No 3 while passing the impugned order.

- C. That the appellant's appointment was made on the recommendation of the DPC/DSC by the competent authority where a verification certificate issued by BISE Bannu in the name of Respondent No. 2 was before him {Annex. H}.
- D. That the appellant submitted her genuine certificates along with application form with a full detail therein, so far the submission of fake documents is concerned that is/was^{not} in the knowledge of the appellant. If the same has taken place it would be by some hidden hands to ~~be~~ deprive her of basic legal and vested right.
- E. That the appellant is well qualified for the post. Her secondary school certificate was also verified but the Respondent No 3 did not examined/perused the case of appellant thoroughly while passing the impugned order dated 25/10/2013.
- F. That as stated above the appellant never submitted forged certificate, if for the sake of arguments some one commits the same act else the appellant must not be deprived of her legal vested right for the act/omission not committed by her.
- G. That the vacancies are available. This fact can be ascertained as the Respondent No. 2 is going to advertise the available vacancies in near future. Despite the fact, the appellant is not being fetched her due right.
- H. That any other ground can also be taken during the arguments with permission of this Hon'ble Tribunal.

It is therefore most humbly prayed that on acceptance of the instant Service appeal, the impugned order dated 25 /10 /2012 passed by Respondent No 3, where departmental appeal against the order dated 08/06/2012 against

the order dated 07/06/2012 passed by Respondent No. 4 was kept intact may kindly be declared unlawful, with out lawful authority, ineffective upon the right of the appellant and she may kindly be reinstated on the post in question with all back benefits. Any other relief, which has not been specifically asked for and deem fit in the circumstances of the case may also be granted to the appellant.


Appellant

Through


Muhammad Saeed Khattak
Advocate, Peshawar.

BEFORE THE HON'ABLE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL,
PESHAWAR

C.M. No -----/2013
IN
Service Appeal No. -----/2013

Rahmida Vs Govt of KPK & others

PETITION FOR CONDONATION OF DELAY, IF ANY.

Respectfully Sheweth,

- 1. That the titled service appeal is pending adjudication before this Hon'ble Tribunal and is fixed for 31/12/2013.
- 2. That the petitioner submits the instant petition, inter alia, on the following Amongst others:

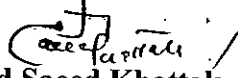
GROUNDS

- A. That the petitioner has a good prima facie case, balance of convenience and irreparable loss are also inclined in favor of the petitioner.
- B. That once she was appointed on the post and she joined the duty, then served the department for a reasonable period created vested right in her favor.
- C. That otherwise too, the order of her removal/withdrawal is/was by an incompetent authority.
- D. That the Hon'ble apex courts have favored the cases to be decided on merits rather on technicalities including the limitation.
- E. That delay, if any, in filing the titled appeal would be due to choosing of wrong forums for redressal of her grievance by the petitioners.
- F. That any other ground can also be taken during the arguments with permission of this Hon'ble tribunal.

It is therefore most humbly prayed that on acceptance of the instant petition, the delay if any, may very graciously be condoned to secure the ends of justice.


Petitioner/Appellant

Through:


Muhammad Saeed Khattak
Advocate, Peshawar.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECY: EDU: BANNU

APPOINTMENT ORDER

In compliance with the Honorable Peshawar High Court D.I.Khan Bench Judgment dated 14-4-2011 and judgment of the August Supreme Court of Pakistan in C.P. No.837 and after vacation of stay from the Hon: Court of Civil Judge No.3 Bannu dated 23-4-2012 and on the recommendation of the DPC/DSC Committee in the meeting held on 14-4-2012, the undersigned is pleased to appoint the following PST Female-candidates out of Union Council/District Open Merit and other Quotas on Regular Basis but without Pension and Gratuity in BPS-07 plus usual allowances as admissible under the existing Rules / Policy in the schools noted against their names with effect from their date of taking over charge in the best interest of public service subject to the Terms/Conditions given below:-

UNION COUNCIL LEVEL MERIT APPOINTMENT ORDERS:

S.No	Name	Father Name	ADDRESS	U/Council	Place of Posting	Remarks
1	Musarat Shaheen	Mehboobur Rehman	Amandi Hanif	Amandi	GGPS Sihal Khel Daud Shah	Against Vac
2	Umer Shad	Syed Ayaz	Nahayat Kila	Aral Hathi Khel-II	GGPS Kotka Zahid Sardar Baik Khel	do
3	Jamila	Akhtar Jan	Spina Tangi Patol Khel	Aral Hathi Khel-II	GGPS Kotka Hap Sarfaraz Domel	do
4	Yasmin bibi	Ghulam Sadiq	Nambat Kila	Aral Hathi Khel-one	GGPS Kotka Gul Rauf Khan Domel	do
5	Nasim	Mir Zaman	Kotka Mirdil Domel	Aral Hathi Khel-one	GGPS Ghani Khel Domel	do
6	Musarat	Mir Payio shah	Aral Hathi Khel	Aral Hathi Khel-one	GGPS Landi Kila	do
7	Noorshad	Shakil Rehman	Kotka Sadrawan Vizda	Asperka Wazir	GGPS Kotka Ayub Khan Painda Khel	do
8	Dil Khurshad	Nazif Khan	Asperka Wazir	Asperka Wazir	GGPS Mirmandi Kila	do
9	Noor Yana	Sabeza Ali Shah	Terkhuba-Kaian	Asperka Wazir	GGPS Inayatullah Khan Kasho Nala Link Road	do
10	Huma Wazir	Himatullah Khan	Asperka Wazir	Asperka Wazir	GGPS Kotka Inayatullah Gauri Top	do
11	Komal Nusrat Zafer	Zafer Ali khan	Kaski Akhundani	Baka Khel	GGPS Doctor Nordaraz Baka khel	do
12	Sufia Larin	Akhtar Ali khan	Kaski Akhundani	Baka Khel	GGPS Narmi Khel Baka Khel Munazz	do
13	Nazia	Noor Baz	Bazar ahrnad Khan	Bazar Ahmad Kh. n	GGPS Khashni Kila Ghani	do
14	Roman Bibi	Mohammad Bashir	Kotka Khushbakht	Bazar Ahmad Kha	GGPS Khashni Kila Ghani	do
15	Natasha Afridi	Mehrullah Khan	Domanza Bezan Khel	Bezan Khel	GGPS Rehman Shamoza: Syed khel	do
16	Shamnaz Begum	Amir Jan	Naser Khan Bharat	Bharat	GGPS Kakan Tughai Khel	do
17	Nazia Awan	Khan Mohammad	Bharat Khas	Bharat	GGPS Shah Daud Bharat	do
18	Salita Rabail	Younas Javed	H.No.486/C Moh:Jang	City-II	GGPS Bannu city No.4	do
19	Salma Aslam	Mohammad Aslam	H.No.633/D Moh:Munia Bannu	City-II	GGPS Bannu City No.5	do
20	Seemab Gul	Ghazi Mehmood	H No.274/I Moh:Tanch Bazar	City-II	GGPS Bannu City No.4	do
21	Gul Behramzahida	Noor Ali shah	Gulan Daud Shah	Daud Shah	GGPS Shah Daud Daud Shah	do
22	Rahmida	Bakht Ali khan	Musher Daud Shah	Daud Shah	GGPS Piran Daud Shah Bilal	do

A. Ishaq

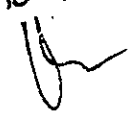
etc

Executive District Officer

	Farakh Naz	Ghulam Nabi	H.No.282/D Moh:Aria Sumaj	Fatima Khel	GGPS Kot Beli	(7)
24	Nayab	Nimatullah Khan	Q.No.3/12 S Wapda Colony	Garhi Sher Ahmad	GGPS Kotka Juma Khan	-do-
	Naila Gul	Ghulam Shah	H.No.150/B Moh:Umer Hayat	Garhi Sher Ahmad	GGPS Kotka Juma Khan	-do-
26	Zafrana Iftikhar	Iftikhar Husain	H.No.419/B Mh:Nasrullah Khan wakil	Garhi Sher Ahmad	GGPS Bannu city No.2	-do-
27	Saleh Gul	Abdur Razaq	Mir Ahmad Ghoriwala	Ghoriwala	GGPS Bharthi Michan Khel	-do-
28	Nayab Younas	Mohamimad Younas	Ghoriwala	Ghoriwala	GGPS Ghoriwala Khas	-do-
29	Farshad Begum	Mohammad Afzal	Fazal Haq Malwana	Hasani Kalan	GGPS Kotka Bala Jan Surani	-do-
30	Tahira Islam	Zainul Islam	Bazida Yousaf Khan	Hasani Kalan	GGPS Bazida Karim Khan	-do-
31	Ghulam Fatima	Malay Ayaz	Basia Khel	Haved	GGPS Aslam Khan Derdariz	-do-
32	Saima Ghazal	Sher Nawaz	Multani Landidak	Haved	GGPS Haved Molvi Anwar Shah	-do-
33	Asima Bibi	Maqbool khan	Zabta Khan Derdariz	Haved	GGPS Mohd Subhan Derdariz	-do-
34	Nazera Bibi	Mohd Khan Awaz	Lewan Derdarzi	Haved	GGPS Lewan Dordariz No.2	-do-
35	Umama Wazir	Wali Rehman	Mali Khel Jani Khel	Hindi Khel	GGPS Hindi Khel Jani Khel	-do-
36	Zainub	Dar Awaz Khan	Mali Khel Jani Khel	Hindi Khel	GGPS Matoon Khel Jani Khel	-do-
37	Tahira	Abdur Rasool	Hinjal Noorbaz	Hinjal	GGPS Mir Azam Baist Khel	-do-
38	Feharaton Sadiqa	Khan Gul Khan	ismail khel	Ismail Khel	GGPS Dhandi Ismail Khel	-do-
39	Noortaj Begum	Kamal Din	ismail khel	Ismail Khel	GGPS Khujaram Khel Ghulam Ali	-do-
40	Shanaz Begum	Sairullah Shah	Akhudan	Jhando Khel	GGPS Normali Jhand Khel	-do-
41	Rizwana Jamil	Mohd Jamil	Shabaz Kakki	Kakki-II	GGPS Lower Zone Kakki	-do-
42	Anila Murad	Murad Ali	Ismail Khani	Kala Khel	GGPS Pir Sabir Shah	-do-
43	Zuhra Ajmai	Mohd Ajma	Shabaz Sheikhan Shah	Kala Khel	GGPS Shamliaz Kala Khel	-do-
44	Hina Murard	Murad Ali	Kala Khel Masti Khan	Kala Khel	GGPS Shadav Nawab Ali	-do-
45	Iftikhar Begum	Ismail Khan	Baik Khel	Khander Khan Khel	GGPS Kotka Nazidullah Karab Kila	-do-
46	Nosheen Sana	Sanaullah Khan	Kotka Mohamad Khan	Khander Khan Khel	GGPS Kotka Raj Ali Azim Kila	-do-
47	Zubaida Nasreen	Ahmad Khan	Awadin Gul Kila	Khander Khan Khel	GGPS Ayub Khan Kila Alanawaz	-do-
48	Nabia Sultan	Sher Dil Khan	Zulqader Mandan	Khawajamad Mandan	GGPS Shukrullah Beri Khel	-do-
49	Musarat Shaheen	Mohammad Salim	Kafshi Khel Zafer Khan	Kosar Fateh Khel	GGPS Kafshi Khel Luqman	-do-
50	Nsheed Akhtar	Nek Nawaz	Faiz Talab Abas Mandan	Kosar Fateh Khel	GGPS Bahader Manak Khel	-do-
51	Nabila Nawaz	D.Ume nawaz	Kotka Khan Sherin	Kot Qalander	GGPS Kotka Khan Sherin Degan	-do-
52	Asima bibi	Gul Jehan	Kumkotka Saqi	Lalozai	GGPS Kumkotka Saqi No.2	-do-

Executive Distt. Officer
Elementary & Secondary Edu.
11/11/11

	Norin Sozar	Suzar Khan	Torka Surani	Lalozai	GGPS Torka Mohd Nawaz	do-
54	Nilofar	Umer Shah Hayat	Gider Mama Khel	Mama Khel	GGHS Hasan Khel Kheraki No.2	do-
55	Aisha	Umer Khan Ayaz	Chota Masoori	Mama Khel	GGPS Nari Jagan	do-
56	Hasiba Khatoon	Gul Mehboob Shah	Dari Saidan	Mamash Khel	GGPS Deri Saidan	do-
57	Amna Bibi	Abdul Nawab	Alladar Mamash Khel	Mamash Khel	GGPS Alladar Mamash Khel	do-
58	Mehnaz	Umer ayaz Khan	Imaro Kila Mandan	Mandan	GGPS Misai Khan Mandan	do-
59	Nosheen Gul	Abdul ghani Shah	Saidan Abdul Qadir Shah	Mandan	GGPS Rastab Ali Bozi Kila	do-
60	Bas Nazira	Shan Qiaz	Saidan Abdul Qadir Shah	Mandan	GGPS Mathan Khan Sabo Khel	do-
61	Mehnaz Aziz	Aziz khan	Bangish Mandan Khel	Mandan	GGPS inayat Mitha Khel	do-
62	Najma	Mir Hakim khan	Lali Kila	Mandev	GGPS Shah Qiaz Mandev	do-
63	Shazia	Umer Khan	Mandew	Mandev	GGPS Mandev Khas	do-
64	Farooq Shah	Rehimdin shah	Chak Dadan	Mira Khel	GGPS Sirmast Mira Khel	do-
65	Najma	Ghafoor Khan	Fazal Shah Mita Khel	Mitha Khel	GGPS Feroz Fatch Khel	do-
66	Saira Khan	Sherzali Khan	Fazal Shah Mita Khel	Mitha Khel	GGPS Feroz Fatch Khel	do-
67	Samrin	Gul Shabaz	Kotka Makhan Kila Patona Mohd Khel	Mohd Khel Wazir	GGPS Kotka Sharifullah Mohd Khel	do-
68	Ulfat Begum	Aziz Khan	Murib Khel Baka Khel	Mohd Khel Wazir	GGPS Hikmatullah Baka Khel	do-
69	Nadia	Gul Shamad	Mati Kila Mohd Khel Wazir	Mohd Khel Wazir	GGPS Zakim Mohd Khel	do-
70	Nusrat Nawaz	Mohammad Nawaz	Amir Waiz Nurar	Mumbathi Barakzai	GGPS Wazir Kila Mumbathi Barakzai	do-
71	Yasmin Zaib	Umer Khan	Mumbathi Barakzai	Mumbathi Barakzai	GGPS Mumbath. Barakzai	do-
72	Amna Qureshi	Rehmatullah	Mirbaz Barakzai	Mumbathi Barakzai	GGPS Zonda Gharbi Delawar	do-
73	Zahida Kalsoom	Akhtar Zaman	Kotka Amir Waiz Khan nurar	Mumbathi Barakzai	GGPS Khan Kila No.2	do-
74	Naheed Akhtar	Mohammad Azam Khan	Nar Sher Mast	Nar Jaffer	GGPS Nar Mir Akber Khan	do-
75	Bushra Norin	Zarban Shah	Pariz Khoni Khel	Nizam Dharma Khel	GGPS Kotka Feroz Shafqat	do-
76	Musarat	Noor Zaman	Pariz Khoni Khel	Nizam Dharma Khel	GGPS Nizam Dharma Khel	do-
77	Raha Rais	Gul Rais Khan	Nurar	Nurar	GGPS Haji Umar Nawaz Nurar	do-
78	Amroza	Safdar ali	Nurar	Nurar	GGPS Abas Khan Nurar	do-
79	Farah Gul	Mohammad Rais	Nurar	Nurar	GGPS Kotka Sardar Ali Nurar	do-
80	Basmina	Asar Ali shah	Bahader Khel Nurar	Nurar	GGPS Sher Ayaz Nurar	do-
81	Kanza Norin	Safdar Ali Khan	Shabaz Azmat Khel	Shabaz Azmat Khel	GGPS Kotka Baber Shabaz Azmat Khel	do-
82	Samrad	Rashid Nawaz	Kotka Knudai Shabaz Azmat Khel	Shabaz Azmat Khel	GGPS Kotka Baber Shabaz Azmat Khel	do-

A. Akhtar


Executive Distt. Officer
 Elementary & Secondary Edu.
 Rawalpindi

ore


Sl. No.	Aisha Iqbal	Sir Iqbal	Shabaz Azmat Khel	Shabaz Azmat Khel	GGPS Azmat Khel Muqader	Shabaz Muqader	-do-
64	Saima Zahid	Zahidullah Khan	Akhundan Azmat Khel	Shabaz Azmat Khel	GGPS Azmat Khel Muqader	Shabaz Muqader	-do-
65	Rakhshanda	Sardar ali khan	Ghora Baka Khel	Takhti Khel	GGPS Badshadin Baka Khel	Noor Sany Khel	-do-
66	Shaheen Bibi	Sher Ali Khan	Surat Khan Kila	Takhti Khel	GGPS Khalidin Baka Khel	Murib Baka Khel	-do-
67	Shakeela Bibi	Mosam Khan	Ahmad Shah Khel	Serki Zerki Pirba Khel	GGPS Bannuchi Kila	Habibullah	-do-

TERMS AND CONDITIONS

1. Their Service will be considered regular but without pension and gratuity in term of Section-19 of NWFP, civil servant Act, 1973 as amended vide NWFP, civil servant Amendment Act, 2005. They will however be entitled to contributory provident Fund in such a manner and such rates as may be prescribed by the Government.
2. Their services will be considered on probation for two year from the date of taking over charge.
3. Their services are not transferable from the Union Council where they are appointed.
4. Their services can be terminated at any time, in case their performances are found unsatisfactory during probation period. In case of misconduct they will be proceeded against under the Khyber Pakhtunkhwa E and D Rules 2011 and the rules framed from time to time.
5. The candidates should join their post within 15 days. The DDO Female Primary Bannu should furnish a certificate to the effect that the candidates have joined the post or otherwise, after 15 days of the issuance of this order, failing which, their orders will automatically stand cancelled.
6. Charge should not be handed over if age of the candidate is below 18 years or above 35 years as per Govt. Rules. In case of fake certificates/Degrees or any other mistake in the said appointment order detected later on, the undersigned reserves the right to withdraw/amend/modify the appointment orders accordingly.
7. The DDO Female may not release pay of the above PST Female teachers before proper verification of their documents and pay release order from the undersigned.
8. They will produce Health and age certificates from Medical Superintendents concerned Hospital before taking over charge.
9. On the acceptance of the above Terms and Conditions; the appointees should join the post and submit their charge report to all concerned.
10. No TA/DA etc is allowed to any one.

SARAF ALI SHAH
EXECUTIVE DISTRICT OFFICER
ELEM: AND SECY: EDU: BANNU

Endst. No. 4192-4288 /AE-I/Female PST/2012 Dated the 23-04-2012

Copy for information and necessary action to:-

1. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa.
3. The District Coordination Officer Bannu
4. District Officer Female E and SE Bannu
5. DDO Female Primary Bannu with the remarks that their pay may not be drawn until and unless their testimonials are not verified from concerned Board/University.
6. District Accounts Officer Bannu
7. Registrar Peshawar High Court Bannu.
8. Member inspection team Peshawar High Court Peshawar w/r to his order No.772/ dated 13-4-2012.
9. Govt. Pleader Bannu

[Signature]
23/4/12
EXECUTIVE DISTRICT OFFICER
ELEM: AND SECY: EDU: BANNU
Executive Distt. Officer,
Elementary & Secondary Edu,
Bannu

[Handwritten initials]

[Handwritten signature]

Annex-3 A

کارز (گورنر)

صحت کوالیٹی
 اینگز نکیٹو ڈسٹرکٹ ایمر ایلمنٹری اسکول
 سکول ڈسٹرکٹ ایمر ایلمنٹری اسکول
 4192-4288
 23/4
 2012
 23/4
 2012

بذریعہ ارسال کے
 رطوبت سے محفوظ رکھ کر ایمر ایلمنٹری اسکول
 سکول

تعمیراتی اطلاع
 (1) اینگز نکیٹو ڈسٹرکٹ ایمر ایلمنٹری اسکول
 ایمر ایلمنٹری اسکول

(2) ڈسٹرکٹ ایمر ایلمنٹری اسکول
 کارز (گورنر) ایمر ایلمنٹری اسکول
 کارز (گورنر) ایمر ایلمنٹری اسکول
 Rahimda
 PST

Govt. Girls Primary School
 Piran Dawar Sub-Bazant

۱۲۴
 ۱۲۴

Annex-B

11

BU:S.No. 030406

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No, 2574

Board of Intermediate & Secondary Education BANNU (N-W.F.P), PAKISTAN.



SECONDARY SCHOOL CERTIFICATE EXAMINATION

SESSION 2007 ANNUAL

This is to Certify that Rahmida

Daughter of

Bakht Ali Jan

Student of

District Bannu

has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu held in April, 2007 as a private candidate.

She obtained 521 marks out of 900 and has been placed in Grade C

Representing Good. The candidate passed in the following subjects:

1. English	2. Urdu	3. Ish mlyat	4. Pakistan Studies
5. General Science	6. Elements Of Home Economics	7. Islamic Studies	8. Mathematics

[Handwritten signature]

Date of birth: (26-06-1985) in words: 26 June, Nineteen Eighty-Five.

Registration No: 2574-Part-2-07

Date of declaration of Result: 16-07-2007

Prepared on: 06-05-2009

[Signature]
Asstt: Secretary

[Signature]
Secretary
Bannu

[Signature]
SECRETARY

This certificate is issued without alteration or erasure

[Handwritten initials]



**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
BANNU N.W.F.P. PAKISTAN**

S.N. 9214

Secondary School Certificate Examination

Detailed Marks Certificate

Roll No: 2574

Session: 2007 (Annual 10th)

Group: Humanities

Registration No: 2574-Pvt-2-07

Certificate No: 20702574

(17)

This is to certify that Rahmida
Son / Daughter of Bakht Ali Jan
and a student of District Bannu

has secured the marks shown against each subject, in the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu, held in April, 2007 as Private Candidate

Subject	Marks	MARKS OBTAINED			
		10Th		Total	In Words
		Theory/Paper-A	Practical/Paper-B		
1. English	150	46	42	88	Eighty-Eight
2. Urdu	150	46	46	92	Ninety-Two
3. Islamiyat	75	47	--	47	Forty-Seven
4. Pakistan Studies	75	48	--	48	Forty-Eight
5. General Science	100	64	--	64	Sixty-Four
6. Elements Of Home Economics	100	51	--	51	Fifty-One
7. Islamic Studies	100	57	--	57	Fifty-Seven
8. Mathematics	150	38	36	74	Seventy-Four

Total 900	521-C	Five Hundred Twenty-One Only
Remarks	Humanities Group	

U

Date of Birth according to Registration Record: 26-06-1985 (26 June, Nineteen Eighty-Five)

Date of declaration of Result: 16-07-2007

Prepared by: [Signature]

Checked by: [Signature]

Date of issue: 16-07-2007

[Signature]
Controller of Examinations
Board of Intermediate and
Secondary Education, BANNU

Muhammad Iqbal

Headmaster
G.H.S. Kotla Muhammad Khan
81000

Note: Error Omission Excused

(COMPILED BY COMPUTER CELL BISE, BANNU)

acc
[Signature]

Roll No: 34622

Board of Intermediate & Secondary Education
BANNU (N-W.F.P), PAKISTAN

BU:S.No. 023654



PROVISIONAL CERTIFICATE

INTERMEDIATE EXAMINATION

SESSION 2010 ANNUAL
Humanities Group

THIS IS TO CERTIFY THAT Rahmida

Daughter of Bakht Ali Jan

Student of Bannu District

Registration No. 08625-Pvt-1-09 has passed the Intermediate Examination

of the Board of Intermediate & Secondary Education, Bannu held in April, 2010

as a Private candidate. She obtained 672 marks out of 1100 and has been

placed in Grade "B" Representing Very Good.

Result declaration Date: 21 July, 2010

Prepared by: [Signature]

Checked by: [Signature]
19/7/10

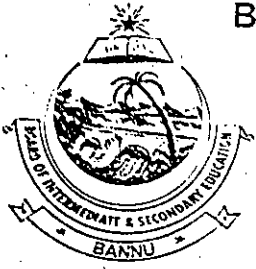
[Signature]
ASST. SECRETARY (CERTIFICATE)

Compiled by Abid Khan Computer Cell Certificate Section 21 July 2010

[Signature]
Headmaster

M. S. Kolia, Muhammad Khair
Bannu

[Signature]



BOARD OF INTERMEDIATE & SECONDARY EDUCATION, BANNU
KHYBER PAKHTUNKHWA, PAKISTAN

16712

Higher Secondary School Certificate Examination S. No.

Detailed Marks Certificate

Roll No: 34622

Session: 2010 (Annual Part-II)

Group: Humanities

Registration No: 0862--Pvt--1-09

Certificate No: 21034622

This is to certify that

Rahmida

Son / Daughter of

Bakht Ali Jan

and a student of

District Bannu

has secured the marks shown against each subject, in the Higher Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu, held in April, 2010 as Private Candidate

SUBJECTS	MAXIMUM MARKS				MARKS OBTAINED				Total	In Words
	Part-I		Part-II		Part-I		Part-II			
	Theory	Practical	Theory	Practical	Theory	Practical	Theory	Practical		
1. English	100		100		56	--	48	--	104	One Hundred Four
2. Urdu	100		100		54	--	73	--	127	One Hundred Twenty-Seven
3. Islamic Education	50				28	--	--	--	28	Twenty-Eight
4. Pakistan Studies			50		--	--	31	--	31	Thirty-One
5. Islamic Studies	100		100		69	--	64	--	133	One Hundred Thirty-Three
6. Islamic History	100		100		63	--	64	--	127	One Hundred Twenty-Seven
7. Civics	100		100		64	--	58	--	122	One Hundred Twenty-Two

Total Marks: 1100 Marks Obtained:

672-B

Six Hundred Seventy-Two Only.

Remarks

Date of declaration of Result: 21-07-2010

Prepared by: [Signature]

Checked by: [Signature]

Date of issue: 21-07-2010

Mohammad Iqbal Khan

Headmaster
S.A.S. Kotla Muhammad Khan
Bannu

[Signature]
Controller of Examinations

Note: Error / Omission excepted.

(COMPILED BY COMPUTER CELL BISE, BANNU)

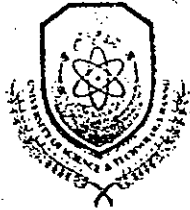
etc
etc

Serial No. 04 769

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Science & Technology Bannu

Khyber Pakhtunkhwa Pakistan



Provisional Certificate

Session 2010-2012

This is to certify that Mr./Miss. Rahmida S/D of Bakht Ali Jan

a Student of Private Candidate

has passed Bachelor of Arts Examination

held in June, 2012 He/She was placed in 2nd Division/Grade/GPA securing 295 marks out of 550

The Examination was taken as a whole / in parts As a Whole

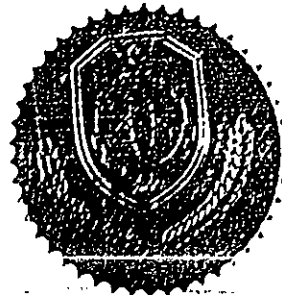
Roll No. 27836

Reg. No. 2010-UB-BP-33789

Issue Date 04-07-2012

Prepared by: Mahabub

Checked by: [Signature]



Muhammad Ghulam Khan
Headmaster
S.S. Kotla Muhammad Khan
Bannu

[Signature]
Controller of Examinations

UST BANNU

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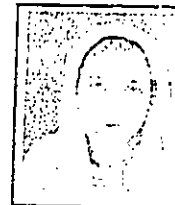


UNIVERSITY OF SCIENCE & TECHNOLOGY BANNU

Khyber Pakhtunkhwa PAKISTAN

S.No:13911

DETAILED MARKS CERTIFICATE



Bachelor of Arts

Session: 2010-2012

Part-II Annual Examination Held in June, 2012

Name: Rahmida Roll No: 27836

Father's Name: Bakht Ali Jan Reg No: 2010-UB-BP-33789

Institute Name: Private Candidate

The Candidate has secured the following Marks and is placed in 2nd Division.

No.	Subjects	Max Marks	MARKS OBTAINED			
			Theory	Practical	Total	In Words
1	Part-I	285		---	136	ONE HUNDRED THIRTY-SIX
2	Islamic Studies (Elective)	75	55	---	55	FIFTY-FIVE
3	Urdu	75	46	---	46	FORTY-SIX
4	English (Comp)	75	31	---	31	THIRTY-ONE
5	Pakistan Studies (Comp)	40	27	---	27	TWENTY-SEVEN
Total		550			295	TWO HUNDRED NINETY-FIVE

Note: Required Pass Percentage in each Subject (Written & Practical Separately) 33, Aggregate Pass Percentage 35

The Examination was taken as a Whole

Prepared by: [Signature]

Checked by: [Signature]

[Signature] Controller of Examinations
University of Science & Technology, Bannu

Result Declaration Date	15-06-2012
Issue Date	15-06-2012



Errors & omissions excepted, if any, are subject to subsequent rectification by the competent authority

12/2012

19

18

17

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Roll No. 160382

PROVISIONAL RESULT CARD

Name RAHMIDA
Fathers's Name BAKHT ALI JAN
Address FARID MICRO PHOTO STATE TANCHI
Tehsil BAZAR BANNU
District BANNU

Roll No. Z651197
Registration No. 07NBU1797
Final Semester SPR- 2008

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Mark	
			Maximum	Obtained
AUT- 07	0614	EDUCATIONAL PSYCHOLOGY	100	66
AUT- 07	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	68
AUT- 07	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	65
SPR- 08	0618	TEACHING OF MATHEMATICS	100	64
SPR- 08	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	72
SPR- 08	0617	TEACHING OF URDU	100	52
SPR- 08	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	60
SPR- 08	0613	PRINCIPLES OF EDUCATION	100	70
SPR- 08	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	90

Muhammad Iqbal Khan
Headmaster
Sikandar Muhammad Khan

CREDITS: 5

Total Marks / Obtained 900 / 607

Result Declared on MARCH 14, 2009

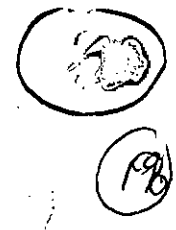
Percentage / Grade 67.5 B

Date of issue APRIL 04, 2009

[Signature]
Controller of Examinations

Disclaimer: This result card is issued provisionally, error and omission excepted, as a notice only. Any entry appearing here does not itself confer any right or privilege on a candidate for the grant of certificate/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

etc



OFFICE OF THE EXECUTIVE DISTRICT OFFICER, ELEMENTARY & SECONDARY EDUCATION, BANNU

OFFICE ORDER.

- 1-WHERE AS Miss Rahmida D/O Bakt Ali Jan was appointed as PTC/PST at GGPS Piran Daud Shah (Bilal)Bannu vide this office order Endst No. 4192-4288 dated 23-4-2012
- 2- AND WHERE AS Her S.S.C Certificate was submitted to the Board of Intermediate & Secondary Education, Bannu vide Dy: District Officer (Female) Primary Bannu No. 653 dated 29-5-2012 as per terms & conditions at S.NO.7 of the appointment order.
- 3-AND WHERE AS The Assistant Secretary (Certificate) Board of Intermediate & secondary Education, Bannu in his letter No. 1024/Certificate/BISE Bannu dated 30-5-2012, declared her S.S.C Certificate as Fake & Bogus.
- 4-AND WHERE AS In the light of Terms & Conditions at S.NO.7 of the appointment order, her appointment as PST/PTC at S.NO.22 in the appointment order of the Union Council Wise Merit, issued under Endst.No. 4192-4288 dated 23-4-2012, is hereby cancelled/withdrawn from the date of taking over charge on the basis of Fake & bogus S.S.C Certificate.

(SARAF ALI SHAH)
EXECUTIVE DISTRICT OFFICER,
ELEMENTARY & SECONDARY
EDUCATION, BANNU.

Endst No. 742-48 /DO (F/S) PTC
Copy for information to:-

Dated Bannu the 8/6 /2012.

- 1- District Coordination Officer, Bannu
- 2- Director Elementary & Secondary Education, Khyber Pakhtoonkhwa, Peshawar.
- 3- Deputy District officer (Female) Primary Bannu for information and necessary action with reference to her No. 515 dated 5-6-2012
- 4- Executive District Officer Elementary & Secondary Education, Bannu with reference to his approval vide Para No. 3 dated 5-6-2012.
- 5- District Accounts Officer, Bannu.
- 6- Rahmida D/O Bakht Ali Jan Village Mushar Daud Shah Bannu
- 7- Head Teacher GGPS Piran Daud Shah (Bilal) Bannu.

Handwritten signature

Received on 6/7/12

Handwritten signature
6/7/12

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Handwritten signature
DISTRICT OFFICER (FEMALE)
ELEMENTARY & SECONDARY
EDUCATION, BANNU

Annex-5

BEFORE THE LEARNED DISTRICT COORDINATION OFFICER BANNU.

Mst. Rahmida D/O Bakht Ali Jan village Mushar Daud Shah Bannu.

.....Appellant.

VERSUS

1. EDO(E&SE)Bannu.
2. DO Female (E&SE)Bannu.
3. Dy.DO(F) (E&SE) Bannu.

.....Respondents

REQUEST FOR RE-INSTATMENT AS PST BY DIRECTING RESPONDENT NO.2, TO WITH DRAW THE IMPUGNED TERMINATION ORDER AND ALSO DIRECT HER NOT TO EXERCISE THE POWERS FOR WHICH SHE IS NOT COMPETENT AS PER JOB DISCRPTION AND PREVAILING POLICY.

Respectfully Sheweth,

The appellant humbly submit as under No.

RECEIVED
5856
Dt. 19-7-2012
Return date: _____
Deputy Commissioner Officer Bannu

Brief Facts.

1. That the appellant was appointed as PST at GGPS Piran Daud Shah Bannu vide EDO(E&SE)NO.4192-4288 the dated 23-04-2012.(copy of the appointment is annexed as Annexure "A")
2. That the appellant has now been terminated vide Endst.NO.742-48/DO(F/S)PTC the dated 08/06/2012, received on 06-07-2012.(copy of the termination order is annexed as Annexure "B").
3. That the termination order was issued on the basis of tampering in the SSC certificate, which the appellant does not own.
4. That the certificate of SSC submitted by the appellant is issued by the BISE Bannu is accurate in all respects(copy of the SSC is annexed as Annexure "C").
5. That due to some clerical mistake committed during the feeding of data by the officials have created the present confusion which resulted in the termination of the appellant.
6. That Respondent NO.2 has no such powers to issue termination orders as per job description and prevailing policy.
7. That as per General Clauses Act, if an incompetent authority commits any action for which he/she is not authorized in normal practice then such a person will become competent to correct the mistake committed.

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8. That the termination order has been issued with out prior notice and non observance of codal formalities which shows the malafide intention of Respondent NO. 2 therefore, in effective on the rights of the appellant.
9. That as per justification of vacant posts displayed on the notice board, vacant posts were available in the union council of the petitioner, therefore the appellant could be appointed and there was no need for tampering as stated in the allegations leveled against the appellant.
10. That the appellant can't be penalized for placing the tampered certificate of SSC by the officials in place of actual certificate dually verified.

It is therefore, requested that on acceptance of the instant appeal, the appellant may very graciously be re-instated by set a siding the base less allegations from the date of termination.

Rahmida
Mst. Rahmida D/O Bakht Ali Jan village Mushar
Daud Shah Bannu.

AFFIDAVIT.

Certified that all the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed.

Rahmida
Mst. Rahmida D/O Bakht Ali Jan village Mushar
Daud Shah Bannu.

Attorney
W

CC

Annex - ^E 21

OFFICE OF THE DISTRICT COORDINATION OFFICER BANNU

No 4332/DCO/AE/PST
Dated 25/10/2012

TO,

Mst: Rahmida D/o Bakht Ali
R/o Musher Daud Shah Bannu

Subject: APPEAL FOR RE-INSTATEMENT IN SERVICE


Memo:

Reference your appeal dated 19/07/2012 for re-instatement in service.

The verification of your SSC and HSSC received from Assistant Secretary Board of Intermediate and Secondary Education Bannu reveals that you have tempered the certificates and increased your marks therein with un-fair means.

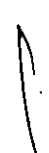
According to your actual marks obtained in SSC and HSSC duly verified by the BISE Bannu, your score as shown in the merit list could not be justified and your appointment as PST seems not eligible.

Your appeal is hereby dismissed and termination order issued by EDO (E&SE) Bannu vide No.742-48/DO(F/S)PTC dated 08/06/2012 is seems to be quite genuine and kept intact.


District Coordination Officer,
Bannu

Even No & date

Copy forwarded to Executive District Officer (E&SE) Bannu for information with reference to above.


District Coordination Officer,
Bannu

etc
etc

(2)

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Annex-1

F
C
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BEFORE THE COMMISSIONER, BANNU DIVISION

Mst. Rahmida D/O Bakht Ali Jan village Mushar Daud Shah, Bannu ----- Appellant

Versus

1. District Coordination Officer, Bannu.
2. Executive District Officer (E&S) Education, Bannu.
3. District Officer (Female) (E&S) Education, Bannu-----Respondents

APPEAL AGAINST THE ORDER BEARING NO.4332/DCO/AE/PST, DATED 25-10-2012 PASSED BY DISTRICT COORDINATION OFFICER, BANNU WHEREBY APPEAL OF THE APPELLANT REGARDING RE-INSTATEMENT AS PRIMARY SCHOOL TEACHER (PST) WAS DISMISSED AND EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION ORDER BEARING NO.742-48, DATED 08-06-2012 WAS MAINTAINED.

Attested
A. J. D.

Reader to Commissioner
Bannu Division

Respectfully Sheweth,

The appellant humble submission is as under:-

8247
22 - 11 - 12

FACTS:-

ACR

COMMISSIONER
Bannu Division

Reader

A. J. D.

05-11-12

1. That the appellant was appointed as Primary School Teacher (PST) vide Respondent No. 2 i.e. Executive District Officer (E&S) Education, Bannu order bearing endorsement No. 4192-4288/AE-I/Female PST/2012, dated 23-04-2012 and was posted in Govt. Primary School Piran Daud Shah Bilal vide the same order. (Annex A)
2. That appointment of the appellant as Primary School Teacher was made sheer on merit basis as per her educational/academic qualifications (Annex B).
3. That the appellant submitted her arrival report on ~~24-11-12~~ (Annex C) However, appointment of the appellant was cancelled/withdrawn by the Respondent No.3 on the basis of fake & bogus of S.S.C. certificate vide impugned order bearing endorsement No.742-48/DO (F/S)PTC, dated 08-06-

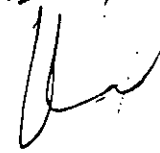
Attested
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CR
C.A.

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5. That after aggrieved from the Respondent No.3 above impugned order, the appellant filed a Departmental Presentation before the Respondent No.1 i.e. District Coordination Officer, Bannu for her re-instatement as Primary School Teacher (Annex E).
6. That Respondent No.1 vide his impugned order bearing No.4332/DCO/AE/PST, dated 25-10-2012 dismissed the appeal of the appellant and maintained the order of Respondent No.3. (Annex F)

GROUNDS:

- A. That the impugned order of Respondent No.3 dated 08-06-2012 is illegal, unlawful and passed in very haphazard and hasty manner as neither proper procedure of Khyber Pakhtunkhwa Govt. Servants (E&D) Rules, 2011 was adopted by the Respondent No.3 nor the appellant was given any chance of personal hearing.
- ✓ B. That Respondent No.2 is a competent authority in respect of the appointment/dismissal of the Primary School Teachers. All appointments/terminations of Primary School Teachers as per the rules are made on the signature of the Respondent No.2 being competent authority. Though the appointment order of the appellant is signed by the Respondent No.2, however, her cancellation/withdrawal order have been signed by Respondent No.3 who is not a competent, and therefore, the same is illegal and unlawful.
- C. That as per the procedure, the competent authority, before issuance of appointment order of the appellant, should have sent her academic qualifications to the concerned Board/University for verification, and after getting verification of her academic qualification from the concerned Board/University, the Respondent No.2 was competent to either place the case of appellant before Department Selection Committee or withdraw the same on pretext of any illegality in her educational qualification.

Attest


OT


- 24
- D. As appointment of the appellant was made on the recommendations of Department Selection Committee, therefore, it means that verification of her academic qualification was already verified from the concerned Board by the Respondent No.2.
- E. Furthermore, the Department Selection Committee's recommendation in respect of the appellant's appointment is a clear justification of authenticity of the appellant case as being genuine.
- F. That copies of academic qualifications from SSC to BA of the appellant are genuine as enclosed as (Annex-II).
- G. That Respondent No.3 is not competent to issue cancellation/withdrawal order of the appellant under the rules, and therefore, illegal and unlawful.
- H. That Respondent No.1 has not examined/perused the case of the appellant thoroughly and issued his impugned order dated 25-10-2012 in a hasty and haphazard manner.

In view of the above facts and circumstance, it is humbly prayed that on acceptance of this appeal, the impugned order dated 25-10-2012 passed by the Respondent No.1 and order dated 08-06-2012 passed by the Respondent No.3 (cancellation/withdrawal's order of the appellant) may be set aside and the appellant may please be re-instated into service with all service back and benefits.

Yours Obediently,

Attest
[Signature]
Rahmida.
MST. RAHMIDA
D/O BAKHT ALI JAN
Through her Husband

عزیز علی خان

CFE
[Signature]

Annexure F/1 (25)



Mrs. Rafiqi VS District Coordination Officer Bannu & Others' Service Appeal

GS&PD NWFP-1675-F.S-10,000 PAIDS-7.3.95-(26) Disk-9
Date of Order or Proceedings: 02.07.2013
Order or Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary

ORDER

This is a service appeal filed by the appellant against the orders dated 25.10.2012 passed by District Coordination Officer Bannu, the respondent, whereby an order of the appellant for re-instatement as Primary School Teacher (PST) was dismissed and an order dated 08.06.2012 issued by Executive District Officer, Elementary & Secondary Education, Bannu was maintained.

Brief facts of the case are that the appellant was appointed as Primary School Teacher (PST) on 23.04.2012 by Executive District Officer (E&S) Education Bannu. After verification from Board of Intermediate & Secondary Education Bannu her Secondary School Certificate was declared fake & bogus and thus she was terminated from service by EDO (E&S) Education Bannu through an order dated 08.06.2012. Her appeal against the said orders was dismissed by DCO Bannu and the orders of EDO (E&S) Education Bannu were maintained.

Notice was issued to the respondent department and comments were sought from them. Secondary School Certificate and Higher Secondary School Certificate of the appellant were verified from Board of Intermediate & Secondary Education Bannu and were found genuine. Fake certificate of the appellant was re-verified from B.S.E. Bannu on 17.06.2013 and was found bogus.

Appellant present through attorney, counsel for the appellant and representative of the respondent (EDO, E&S Education, Bannu) also present and heard. Comments of respondent department also perused. Since the appellant was appointed through fake and bogus Secondary School Certificate which provided merit to her but as per her genuine Secondary School Certificate she does not come on merit. The instant appeal is, therefore, dismissed and the orders passed by respondents are maintained.

Announced.
02.07.2013

[Signature]
COMMISSIONER
BANNU DIVISION.

Attested
[Signature]
Reader to Commissioner
Bannu Division

Attorney
[Signature]

15-7-2013

[Handwritten initials]

Annex

(26) (27)

ایگن کٹیو ڈسٹرکٹ آفیسر ایڈمنسٹریٹو ریڈنگ سیکشن آف ایجوکیشن ضلع شیون
درخواست نامہ نمبر: 2010
(انٹرویو کے لیے 40% ہونے)

65

نام: محمد علی خان
پتہ: گورنمنٹ ہائی اسکول، شیون

پروفیشنل ایجوکیشن بورڈ، شیون
مسترد اور مشاہدہ اسکالرشپ
پتہ: گورنمنٹ ہائی اسکول، شیون
پتہ: گورنمنٹ ہائی اسکول، شیون

گورنمنٹ ہائی اسکول
گورنمنٹ ہائی اسکول
گورنمنٹ ہائی اسکول

26/11/2010

تعمیلی ریجنل ایجوکیشن آفیسر، شیون (Office Phone no: 615515)

امتحان	سال پاس کردہ	پاس کر دیے گئے	فارمولہ
پہلا	2007	521	= 30 X 900 ✓
دوسرا	2010	672	= 20 X 1100
تیسرا	2012	295	= 10 X 550
چوتھا	-	-	= 10 X -
پنجم	2009	807	= 25 X 900
ششم	-	-	-

Rahimullah Muhammad
راہم اللہ محمد

Headmaster
Gustaf Muhammad
عبدالغفار

Handwritten signature

مستعملہ یونین گورنمنٹ ہائی اسکول شیون
پتہ: گورنمنٹ ہائی اسکول، شیون
پتہ: گورنمنٹ ہائی اسکول، شیون

Application for Interview of 11/11

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Annexure H
27

Board of Intermediate and Secondary Education, Bannu.

No. 906 Certificates/BISE, Bannu.

Dated 20-4-2012

To Executive District Officer (Revenue)
Block and Sevy Education Bannu



Subject: VERIFICATION.

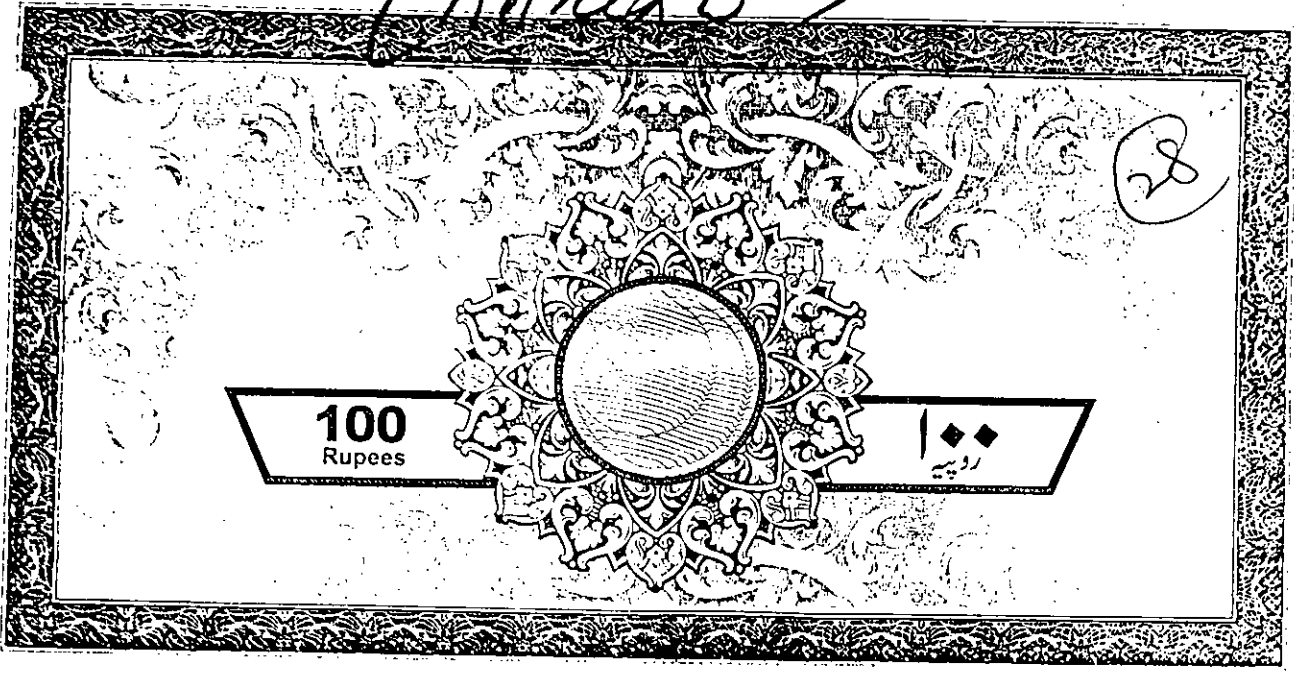
I am directed to refer to your letter No. 3523 dated 6-4-2012

on the subject noted above and to inform you that photocop (y) (ies) of Original / Provisional Certificate (s) of the following candidate (s) enclosed with the above mentioned letter have thoroughly checked and found as detail given below:

S.No.	Roll No	Name	Father's Name	Session	Remarks
1	2074	Rahmida	Bakht Ali Khan	SSC 10th-2007	Correct
2	34622	Rahmida	Bakht Ali Khan	SSC 7-9-10	Correct
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					

cc
[Signature]

[Signature]
(Assistant Secretary)
Board of Intermediate and Secondary Education, Bannu.
Secretary Education, Bannu.



(38)
(30)

جناب صدر صحن سرورس ٹرڈ مینٹل KPK مشاور

اضفیدہ بنام سکریٹری اچوریشن

سرورس اسبل
-3-

جو کہیں بوقت صحت بدن لعل بقا می پوش دیو اس واکرہ غبرے

کے لگوو دیتی ہوں کہ من حقوہ بوجہ ذاتی صحر و ضیات اور پردہ نشینی

معدالت انجناب میں مذکورہ بائد نہیں کی پیروی کرنے سے قاصر ہوں

بدیہ وجہ اپنا فائدہ سہی ظریف خان کو محتسب رفاضی مخترا کرتا ہوں۔

محتسب رفاضی کو احتسب حاصل ہوگا۔ نہ وہ میری طرف سے ہیں

دائرہ میں درخورست دیں۔ جواب درخورست دیں۔ جواب اچو بدیں۔

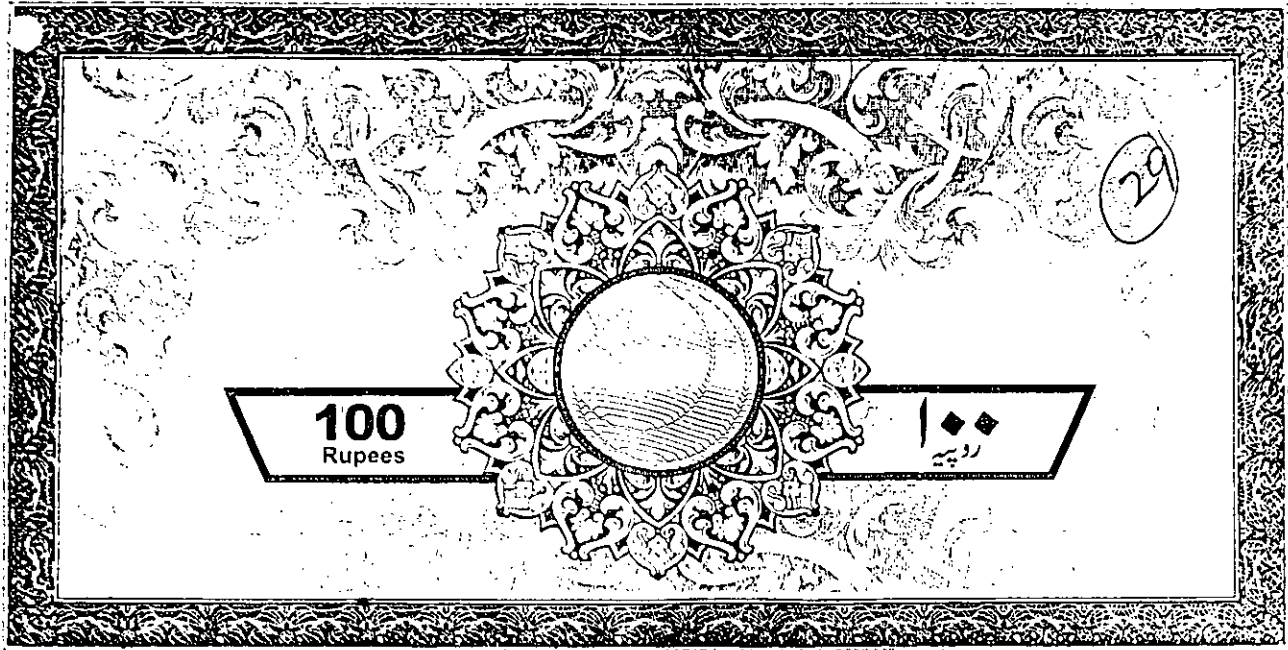
سیرت گوربان دیں۔ خرچہ گوربان جمع کریں۔ گوریان پر صرفہ کریں۔

اپنی کریں۔ درصافی ہیں کریں۔ ٹگڑا نہیں معدالت لعل تک ہر مستم

عزیز احمد

12/8/13

29



P 3



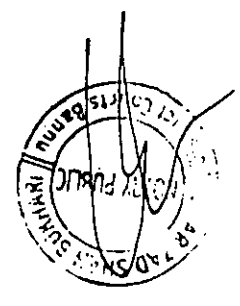
گواہ شہید شاہ دروازہ زرد دروازہ دافان سکند

بازار دافان بنوں

11101-1858575-5

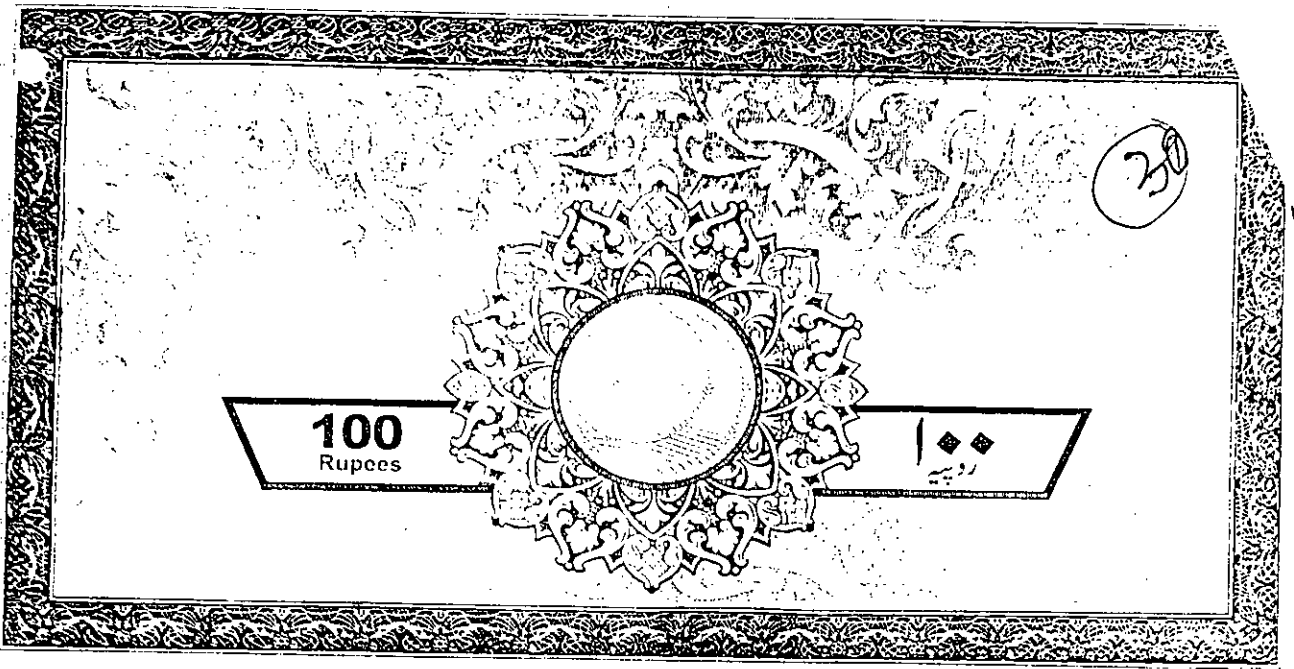
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شیر علی خان دست محمد اکبر پور



گواہ شہید شاہ
 بازار دافان بنوں
 NIC = 11101-3887035-1

12/8/25



P 2

(28)

کا، دوائے شہری - قدم عنوان با لہ و درسیں کر دیں. اوسل معزز شہری. اوس کو
 قیس اد شہری. یا اوس قدم عنوان با لہ سے اٹ کر دیں.
 نیز جنسار فاضل و مہ تمام رضیارات سافہ پردافہ حاصل ہے.
 جو نہ حق قدرہ کو حاصل ہے. لہذا جنسار نام فاضل سند شہری ہے.

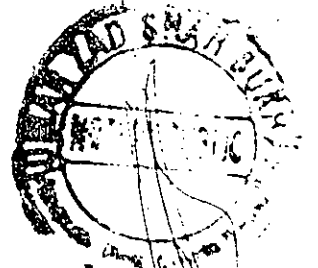
12-8-13

صدر

A

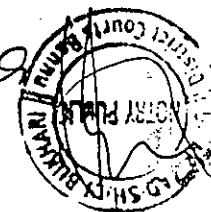
محمد ظفر لیب خان جنسار، شہری

رضمیرہ، جنسار، دیندرہ



Rahimuda

11101-6910924-1



12/8/13

Page 3

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1247/2013

Mst. Rahmida

Vs.

Government of KPK & others

REJOINDER TO THE PARAWISE COMMENTS

Respectfully Sheweth,

REJOINDER TO PRELIMINARY OBJECTIONS:

1. Incorrect, the appellant has a good cause of action and locus standii.
2. Incorrect, the service appeal is not bad for non-joinder and misjoinder of necessary parties.
3. Incorrect, the service appeal is quite maintainable in its present form.
4. Incorrect, the service appeal is not suffering from any legal and factual defects.
5. Incorrect, the appellant's appointment order has illegally and unlawfully been withdrawn by the incompetent authority with mala fide intentions. The appellant never submitted tempered/faked certificate of her. The form submitted in the office of respondent No.2 along with pre-requisite documents before her appointment testifies her original marks etc.
6. Incorrect, the appellant has come to this court with clean hands.

C. Ground C regarding the appellant's appointment has been admitted but has not brought on record anything regarding her documents which they claim as bogus. They have neither brought on record her secondary school certificate which the respondents claim to be bogus and submitted before the appointing authority nor any verification certificate.

D. Incorrect, detail discussion regarding the same has already been mentioned in the above paras.

E. As mentioned in the memo of appeal'

F. As above.

G. As above.

H. As above.

It is therefore most humbly prayed that on acceptance of the instant rejoinder the comments of the respondents be rejected and the appeal of the appellant be kindly allowed as per prayer.

Appellant

Through


Muhammad Saeed Khattak


Advocate, Peshawar.

The appeal of Mst. Rahimda D/O Bakht Ali Jan r/o Village Mushar Daud Shah Bannu received today i.e. on 15/08/2013 is incomplete on the following scores which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of the appeal may be got signed by the counsel.
- 2- The law under which appeal is filed is not mentioned.
- 3- Departmental appeal having no date be dated.
- 4- Eight more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 1154 /S.T,

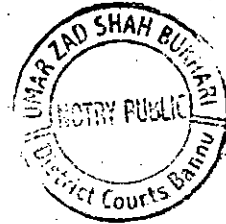
Dt. 15/08 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Umar Zad Advocate, Bannu.

After removal of objections from
Serial No 1 to 4 once again is
submitted.


Umar Zad Shah Buhari
Advocate



BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA PESHAWAR

Appeal NO 1247/2013

Rahmida D/O Bakht Ali Jan R/O Musher Daud Shah Tehsil & District

Bannu

Appellant

Versus

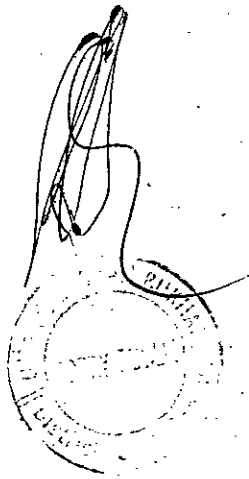
Government of Khyber Pakhtunkhwa through its Secretary Education

Peshawar and others Respondents

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S.No	Particulars	Annexure	Pages
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Dated: 15/08/2013



Rahmida Begum

Rahmida

Through Counsel

Umer Zad Shah Bukhari

Advocate

①

BEFORE THE CHAIRMAN, KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Appeal no - 1247/13

Mst. Rahmida D/O Bakht Ali Jan, R/O Village Mushar Daud Shah, Bannu----- Appellant

1251
15-8-13

Versus

1. Secretary, Elementary & Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Commissioner, Bannu Division.
4. District Coordination Officer (Now Deputy Commissioner) Bannu.
5. District Education Officer (Female), Bannu.
6. Sub-Divisional Education Officer (Female), Bannu.

Appeal U/S 4 of The Khyber Pakhtoun Khwa Service Tribunal Act 1974,
APPEAL AGAINST THE ORDER DATED 02-07-2013 PASSED BY COMMISSIONER BANNU DIVISION
WHEREBY APPEAL OF THE APPELLANT REGARDING RE-INSTATEMENT AS PRIMARY SCHOOL TEACHER
(PST) WAS DISMISSED AND ORDER BEARING NO. 4332/DCO/AE/PST, DATED 25-10-2012 PASSED BY
DISTRICT COORDINATION OFFICER, BANNU AND ORDER BEARING NO. 742-48, DATED 07-06-2012
ISSUED BY EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION WERE MAINTAINED.

Respectfully shewith,

The appellant humble submission is as under:-

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FACTS

1. That the appellant was appointed as Primary School Teacher (PST) vide order bearing No. 4192-4288/AE-I/Female PST/2012, dated 23-04-2012, issued by Executive District Officer (E&S) Bannu, now District Education Officer (Female), Bannu, respondent No. 5, and was posted in Govt. Primary School Piran Daud Shah Bilal vide the same order. (Annex-A).
2. That the appellant joined her duty on 24-04-2012. (Annex-B).
3. That the appellant was appointed on merit basis as per her educational qualification. (Annex-C).

Co-submitted to ~~copy~~
and filed.

Handwritten signature
23/8/13

Original

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4. That the appointment orders of the appellant were cancelled by the respondent No.5 on the basis of fake and bogus Secondary School Certificate vide order bearing No. 742-48/DO (F/S)PTC, dated 08-06-2012. (Annex-D).
5. That the appellant had submitted her genuine Secondary School Certificate along with her application form for appointment. (Annex-E).
6. That after aggrieved from the respondent No.5 above impugned order, the appellant filed a departmental presentation before the respondent No.4 i.e. District Coordination Officer (Now Deputy Commissioner) Bannu, for re-instatement as Primary School Teacher.(Annex-F).
7. That the respondent No.4 vide his impugned order bearing No. 4332/DCO/AE-I/PST, dated 25-10-2012 dismissed the appeal of the appellant and maintained the order of respondent No.5. (Annex-G).
8. That after aggrieved from the respondent No.4 above impugned order, the appellant filed an appeal before the respondent No.3 i.e. Commissioner Bannu Division, for re-instatement as Primary School Teacher.(Annex-H).
9. That the respondent No.3 vide his impugned order dated 02-07-2013 dismissed the appeal of the appellant and maintained the orders of respondent No.4 and respondent No.5. (Annex-I).

GROUNDS

llr

- A. That the impugned order dated 08-06-2012 of respondent No.5 is illegal, unlawful and passed in haphazard manner as neither proper procedure under (E&D) Rules 2011 was adopted by respondent No. 5 nor the appellant was given any chance of personal hearing. Also neither a proper inquiry was conducted nor a show cause notice was issued to the appellant which were mandatory under E&D rules 2011.

- B. That the Secondary School Certificate which was declared fake and bogus by the respondent No.5 was not submitted by the appellant for her appointment. The appellant had rather submitted her genuine Secondary School Certificate along with her application form. The genuineness of the certificate has authenticated by the respondent No.3 in his order dated 02-07-2013. The fake certificate seems to have been attached by someone else after she had submitted her application form to deprive her from her due right. The respondent No.5, however, without ascertaining any fact and without fixing the responsibility made the appellant a scapegoat and terminated her from service.
- C. That the appellant was appointed on the recommendations of Departmental Promotion and Selection Committee (DP/SC) meeting. The DP/SC after ascertaining pros and cons of the case, issues its recommendations. Since the said recommendations were in her favor it seems that her Secondary School Certificate was quite genuine and the appellant was qualified in each and every respect and her merit made possible her recommendation for her appointment. But the respondent No.5 did not consider any fact and terminated her illegally.
- D. That appointment made on the recommendations of Departmental Promotion and Selection Committee, as per laid down rules and regulations, cannot be withdrawn/cancelled by the appointing authority. Despite the fact, the respondent No. 5 with drawn/cancelled her appointment orders which is against the rule.
- E. That the appellant is well qualified. Her attested/verified copies of educational/professional testimonials are attached for perusal. Also respondent No.3 has verified her Secondary School and Higher Secondary School Certificates and has found both of them genuine. The respondent No.3 has reflected the same genuineness in his order dated 02-07-2013. It shows that her Secondary School Certificate is genuine.

Handwritten signature

4

- F. That the respondent No.4 has not examined /perused the case of the appellant thoroughly and issued his impugned order dated 25-10-2012 in a hasty manner.
- G. That the respondent No.3 verified her Secondary School Certificate and her Higher Secondary School Certificate from the concerned board and found correct both of them. However the respondent No.3, on account of merit position of the appellant in the merit list, dismissed her appeal and maintained orders of respondents No.4 and No.5. But according to her actual merit score and no. of available vacancies the appellant comes on merit.
- H. That the vacancies are available. The fact can be ascertained as the respondent No.5 is going to advertise the available vacancies in near future. Despite the fact , the appellant is not being fetched , her due right.

In view of the above facts, it is humbly prayed that on acceptance of this appeal, the impugned order dated 02-07-2013, passed by respondent No.3, order dated 25-10-2012, passed by respondent No.4 and order dated 08-06-2012 passed by respondent No. 5

(cancellation/withdrawal order of the appointment of the appellant) may be set aside and the appellant may please be re-instated into service with all back service back benefits.

Yours obediently,

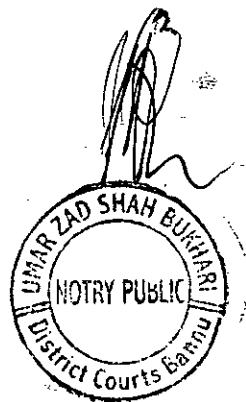
Date 15/08/2013

Rahmida

MST. RAHMIDA,

D/O BAKHT ALI JAN.

Through counsel.



P-5

BEFOE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Appeal NO/2013

Rahmida D/O Bakht Ali Jan R/O Musher Daud Shah Tehsil &
District Bannu

Appellant

Versus

Government of Khyber Pakhtunkhwa through its Secretary
Education Peshawar and others Respondents

AFFIDAVIT

I, Miss Rahmida D/O Bakht Ali Jan , PST Teacher GGPS Piran Daud Shah, Bannu do hereby solemnly affirm and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge & belief and nothing has been concealed from the honorable Tribunal.

Identified by

DEPONENT

Rahmida

Umer
Umer Zad Shah
Bukhari

Advocate Bannu

Affidavit



BEFOE THE HONOURABLE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA PESHAWAR

Appeal NO/2013

Rahmida D/O Bakht Ali Jan R/O Musher Daud Shah Tehsil &
District Bannu

Appellant

Versus

Government of Khyber Pakhtunkhwa through its Secretary
Education Peshawar and others Respondents

MEMO OF ADDRESS:-

The above noted address of the parties are sufficient for effecting
notices upon them.

Date: 15/08/2013

Rahmida
Rahmida Begum

Through Counsel

Umer
Umer Zad Shah
Bukhari

Advocate Bannu

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECY: EDU: BANNU

APPOINTMENT ORDER

In compliance with the Honorable Peshawar High Court D.I.Khan Bench Judgment dated 14-4-2011 and judgment of the August Supreme Court of Pakistan in C.P. No.837 and after vacation of stay from the Hon: Court of Civil Judge No.3 Bannu dated 23-4-2012 and on the recommendation of the DPC/DSC Committee in the meeting held on 14-4-2012, the undersigned is pleased to appoint the following PST Female candidates out of Union Council/District Open Merit and other Quotas on Regular Basis but without Pension and Gratuity in BPS-07 plus usual allowances as admissible under the existing Rules / Policy in the schools noted against their names with effect from their date of taking over charge in the best interest of public service subject to the Terms/Conditions given below:-

UNION COUNCIL LEVEL MERIT APPOINTMENT ORDERS

S.No	Name	Father Name	ADDRESS	U/Council	Place of Posting	Remarks
1	Musarat Shaheen	Mehboobur Rehman	Amandi Hanif	Amandi	GGPS Shal Khel Daud Shah	Against VA?
2	Umer Shad	Syed Ayaz	Nahayat Kila	Aral Hathi Khel-II	GGPS Kotka Zahid Sardar Baik Khel	-do-
3	Jamila	Akhtar Jan	Spina Tangi Patol Khel	Aral Hathi Khel-II	GGPS Kotka Haji Sarfaraz Domel	-do-
4	Yasmin bibi	Ghulam Sadiq	Nambat Kila	Aral Hathi Khel-one	GGPS Kotka Gul Rauf Khan Domel	-do-
5	Nasim	Mir Zaman	Kotka Mirdil Domel	Aral Hathi Khel-one	GGPS Ghani Khel Domel	-do-
6	Musarat	Mir Payio shah	Aral Hati Khel	Aral Hathi Khel-one	GGPS Landi Kila	-do-
7	Noorshad	Shakil Rehman	Kotka Sadrawan Vizda	Asperka Wazir	GGPS Kotka Ayub Khan Painda Khel	-do-
8	Dil Khurshad	Nazif Khan	Asperka Wazir	Asperka Wazir	GGPS Mirmandi Kila	-do-
9	Noor Yana	Sabeza Ali Shah	Terkhuba Kalan	Asperka Wazir	GGPS Inayatullah Khan Kasho Nala Link Road	-do-
10	Huma Wazir	Himatullah Khan	Asperka Wazir	Asperka Wazir	GGPS Kotka Inayatullah Gauri Top	-do-
11	Komal Nusrat Zafer	Zafer Ali khan	Kaski Akhundani	Baka Khel	GGPS Doctor Nordaraz Baka khel	-do-
12	Sufia Larin	Akhtar Ali khan	Kaski Akhundani	Baka Khel	GGPS Narmi Khel Baka Khel Muniaz	-do-
13	Nazia	Noor Baz	Bazar ahmad Khan	Bazar Ahmad Khan	GGPS Khashni Kila Ghani	-do-
14	Roman Bibi	Mohammad Bashir	Kotka Khushbakht	Bazar Ahmad Khan	GGPS Khashni Kila Ghani	-do-
15	Natasha Afridi	Mehrullah Khan	Domanza Bezan Khel	Bezan Khel	GGPS Kotka Syed Rehman Shamoza Syed khel	-do-
16	Shamnaz Begum	Amir Jan	Naser Khan Bharat	Bharat	GGPS Kalan Tughai Khel	-do-
17	Nazia Awan	Khan Mohammad	Bharat Khas	Bharat	GGPS Shah Daraz Bharat	-do-
18	Salita Rabail	Younas Javed	H.No.486/C moh:Jang	City-II	GGPS Bannu city No.4	-do-
19	Salina Aslam	Mohammad Aslam	H.No.633/D Moh:Munia Bannu	City-II	GGPS Bannu City No.5	-do-
20	Seemab Gul	Ghazi Mehmood	H No.274/I Moh:Tanct Bazar	City-II	GGPS Bannu City No.4	-do-
21	Gul Behramzahida	Noor Ali shah	Gulan Daud Shah	Daud Shah	GGPS Shah Alam Daud Shah	-do-
22	Rahmida	Bakht Ali khan	Musher Daud Shah	Daud Shah	GGPS Piran Daud Shah Bilal	-do-

A. Iqbal

Executive District Officer


	Farakh Naz	Ghulam Nabi	H.No.282/D Moh:Aria Sainaj	Fatima Khel	GGPS Kot Beli	-do-
24	Nayab	Nimatullah Khan	Q.No.3/12 S Wapda Colony	Garhi Sher Ahmad	GGPS Kotka Juma Khan	-do-
	Naila Gul	Ghulam Shah	H.No.150/B Moh:Umer Hayat	Garhi Sher Ahmad	GGPS Kotka Juma Khan	-do-
26	Zafrana Iftikhar	Iftikhar Husain	H.No.419/B Mh:Nasrullah Khan wakil	Garhi Sher Ahmad	GGPS Bannu city No.2	-do-
27	Saleh Gul	Abdur Razaq	Mir Ahmad Ghoriwala	Ghoriwala	GGPS Bharthi Michan Khel	-do-
28	Nayab Younas	Mohammad Younas	Ghoriwala	Ghoriwala	GGPS Ghoriwala Khas	-do-
29	Farshad Begum	Mohammad Afzal	Fazal Haq Malwana	Hasani Kalan	GGPS Kotka Babo Jan Surani	-do-
30	Tahira Islam	Zainul Islam	Bazida Yousaf Khan	Hasani Kalan	GGPS Bazida Karim Khan	-do-
31	Ghulam Fatima	Malay Ayaz	Basia Khel	Haved	GGPS Aslam Khan Derdariz	-do-
32	Saima Ghazal	Sher Nawaz	Multani Landidak	Haved	GGPS Haved Molvi Anwar Shah	-do-
33	Asima Bibi	Maqbool khan	Zabta Khan Derdariz	Haved	GGPS Mohd Subhan Derdariz	-do-
34	Nazera Bibi	Mohd Khan Awaz	Lewan Derdarzi	Haved	GGPS Lewan Derdariz No.2	-do-
35	Umama Wazir	Wali Rehman	Mali Khel Jani Khel	Hindi Khel	GGPS Hindi Khel Jani Khel	-do-
36	Zainub	Dar Awaz Khan	Mali Khel Jani Khel	Hindi Khel	GGPS Matoon Khel Jani Khel	-do-
37	Tahira	Abdur Rasool	Hinjal Noorbaz	Hinjal	GGPS Mir Azam Baist Khel	-do-
38	Feharatun Sadiqa	Khan Gul Khan	ismail khel	Ismail Khel	GGPS Dhandi Ismail Khel	-do-
39	Noortaj Begum	Kamal Din	ismail khel	Ismail Khel	GGPS Khujaram Khel Ghulam Ali	-do-
40	Shanaz Begum	Sairullah Shah	Akhudan	Jhando Khel	GGPS Normali Jhano Khel	-do-
41	Rizwana Jamil	Mohd Jamil	Shabaz Kakki	Kakki-II	GGPS Lower Zone Kakki	-do-
42	Anila Murad	Murad Ali	Ismail Khani	Kala Khel	GGPS Pir Sabir Shah	-do-
43	Zuhra Ajmal	Mohd Ajma	Shabaz Sheikhan Shah	Kala Khel	GGPS Shamtiaz Kala Khel	-do-
44	Hina Murard	Murad Ali	Kala Khel Masti Khan	Kala Khel	GGPS Shaddev Nawab Ali	-do-
45	Iftikhar Begum	Ismail Khan	Baik Khel	Khander Khan Khel	GGPS Kotka Nazidullah Karab Kila	-do-
46	Nosheen Sana	Sanaullah Khan	Kotka khan Mohamad	Khander Khan Khel	GGPS Kotka Raj Ali Azim Kila	-do-
47	Zubaida Nasreen	Ahmad Khan	Awadin Gul Kila	Khander Khan Khel	GGPS Ayub Khan Kila Alanawaz	-do-
48	Nabia Sultan	Sher Dil Khan	Zulqader Mandan	Khawajamad Mandan	GGPS Shukrullah Beri Khel	-do-
49	Musarat Shaheen	Mohammad Salim	Kafshi Khel Zafer Khan	Kosar Fateh Khel	GGPS Luqman Kafshi Khel	-do-
50	Nasheed Akhtar	Nek Nawaz	Faiz Talab Mandan Abas	Kosar Fateh Khel	GGPS Bahader Manak Khel	-do-
51	Nabila Nawaz	D.Ume nawaz	Kotka Khan Sherin	Kot Qalander	GGPS Kotka Khan Sherin Degan	-do-
52	Asima bibi	Gul Jehan	Kumkotka Saqi	Lalozai	GGPS Kumkotka Saqi No.2	-do-

Executive Distt: Officer
Elementary & Secondary Edu:
R.00001

7

9

53	Norin Sozar	Suzar Khan	Torka Surani	Lalozai	GGPS Torka Mohd Nawaz	-do-
54	Nilofar	Umer Shah	Hayat Gider Mama Khel	Mama Khel	GGHS Hasan Khel Kheraki No.2	-do-
55	Aisha	Umer Khan	Ayaz Chota Masoori	Mama Khel	GGPS Nari Jajan	-do-
56	Hasiba Khatoon	Gul Shah	Mehboo Dari Saidan	Mamash Khel	GGPS Deri Saidan	-do-
57	Amna Bibi	Abdul Nawab	Alladad Mamash Khel	Mamash Khel	GGPS Aladad Mamash Khel	-do-
58	Mehnaz	Umer ayaz Khan	Imaro Kila Mandan	Mandan	GGPS Misai Khan Mandan	-do-
59	Nosheen Gul	Abdul Shah	ghani Saidan Abdul Qadir Shah	Mandan	GGPS Rastab Ali Bozi Kila	-do-
60	Bas Nazira	Shah Qiaz	Saidan Abdul Qadir Shah	Mandan	GGPS Mathan Khan Sabo Khel	-do-
61	Mehnaz Aziz	Aziz khan	Bangish Mandan Khel	Mandan	GGPS Inayat Mitha Khel	-do-
62	Najma	Mir Hakim khan	Lali Kila	Mandev	GGPS Shah Qiaz Mandev	-do-
63	Shazia	Umer Khan	Mandew	Mandev	GGPS Mandev Khas	-do-
64	Fozia Shah	Rehimdin shah	Chak Dadan	Mira Khel	GGPS Sirmast Mira Khel	-do-
65	Najma	Ghafoor Khan	Fazal Shah Mita Khel	Mitha Khel	GGPS Feroz Fateh Khel	-do-
66	Saira Khan	Sherzali Khan	Fazal Shah Mita Khel	Mitha Khel	GGPS Feroz Fateh Khel	-do-
67	Samrin	Gul Shabaz	Kotka Makhan Kila Patona Mohd Khel	Mohd Khel Wazir	GGPS Kotka Sharifullah Mohd Khel	-do-
68	Ulfat Begum	Aziz Khan	Murib Khel Baka Khel	Mohd Khel Wazir	GGPS Hikmatullah Baka Khel	-do-
69	Nadia	Gul Shamad	Mati Kila Mohd Khel Wazir	Mohd Khel Wazir	GGPS Zakim Mohd Khel	-do-
70	Nusrat Nawaz	Mohammad Nawaz	Amir Waiz Nurar	Mumbathi Barakzai	GGPS Wazir Kila Mumbathi Barakzai	-do-
71	Yasmin Zaib	Umer Khan	Mumbathi Barakzai	Mumbathi Barakzai	GGPS Mumbathi Barakzai	-do-
72	Amna Qureshi	Rehmatullah	Mirbaz Barakzai	Mumbathi Barakzai	GGPS Zonda Ghaibi Delawar	-do-
73	Zahida Kalsoom	Akhtar Zaman	Kotka Amir Waiz Khan nurar	Mumbathi Barakzai	GGPS Khani Kila No.2	-do-
74	Naheed Akhtar	Mohammad Azam Khan	Nar Sher Mast	Nar Jaffer	GGPS Nar Mir Akber Khan	-do-
75	Bushra Norin	Zarban Shah	Pariz Khoni Khel	Nizam Dharma Khel	GGPS Kotka Feroz Shafqat	-do-
76	Musarat	Noor Zaman	Pariz Khoni Khel	Nizam Dharma Khel	GGPS Nizam Dharma Khel	-do-
77	Rafia Rais	Gul Rais Khan	Nurar	Nurar	GGPS Haji Umar Nawaz Nurar	-do-
78	Amrozia	Safdar ali	Nurar	Nurar	GGPS Abas Khan Nurar	-do-
79	Farah Gul	Mohammad Rais	Nurar	Nurar	GGPS Kotka Sardar Ali Nuar	-do-
80	Basmina	Asar Ali shah	Bahader Khel Nurar	Nurar	GGPS Sher Ayaz Nurar	-do-
81	Kanza Norin	Safdar Ali Khan	Shabaz Azmat Khel	Shabaz Azmat Khel	GGPS Kotka Baber Shabaz Azmat Khel	-do-
82	Samrad	Rashid Nawaz	Kotka Khudad Shabaz Azmat Khel	Shabaz Azmat Khel	GGPS Kotka Baber Shabaz Azmat Khel	-do-

Attache


Executive Distt. Officer
 Elementary & Secondary Edu.
 Ramkot

	Aisha Iqbal	Sir Iqbal	Shabaz Azmat Khel	Shabaz Azmat Khel	GGPS Azmat Khel Muqader	Shabaz	
84	Saima Zahid	Zahidullah Khan	Akhundan Azmat Khel	Shabaz Azmat Khel	GGPS Azmat Khel Muqader	Shabaz	-do-
85	Rakhshanda	Sardar ali khan	Ghora Baka Khel	Takhti Khel	GGPS Badshadin Baka Khel	Noor Sany Khel	-do-
86	Shaheen Bibi	Sher Ali Khan	Surat Khan Kila	Takhti Khel	GGPS Khalidin Baka Khel	Murib	-do-
87	Shakeela Bibi	Mosam Khan	Ahmad Shah Khel	Zerki Pirba Khel	GGPS Bannuchi Kila Habibullah		-do-

TERMS AND CONDITIONS

1. Their Service will be considered regular but without pension and gratuity in term of Section-19 of NWFP, civil servant Act, 1973 as amended vide NWFP, civil servant Amendment Act, 2005. They will however be entitled to contributory provident Fund in such a manner and such rates as may be prescribed by the Government.
2. Their services will be considered on probation for two year from the date of taking over charge.
3. Their services are not transferable from the Union Council where they are appointed.
4. Their services can be terminated at any time, in case their performances are found unsatisfactory during probation period. In case of misconduct they will be proceeded against under the Khyber Pakhtunkhwa E and D Rules 2011 and the rules framed from time to time.
5. The candidates should join their post within 15 days. The DDO Female Primary Bannu should furnish a certificate to the effect that the candidates have joined the post or otherwise, after 15 days of the issuance of this order, failing which, her/their orders will automatically stand cancelled.
6. Charge should not be handed over if age of the candidate is below 18 years or above 35 years as per Govt. Rules. In case of fake certificates/Degrees or any other mistake in the said appointment order detected later on, the undersigned reserves the right of with drawl/amendment in the appointment orders accordingly.
7. The DDO Female may not release pay of the above PST Female teachers before proper verification of their documents and pay release order from the undersigned.
8. They will produce Health and age certificates from Medical Superintendents concerned Hospital before taking over charge.
9. On the acceptance of the above Terms and Conditions, the appointees should join the post and submit their charge report to all concerned.
10. No TA/DA etc is allowed to any one.

SARAF ALI SHAH
EXECUTIVE DISTRICT OFFICER
ELEM:AND SECY: EDU:BANNU

Endst.No. 4192-4288

/AE-I/Female PST/2012 Dated the 23-04-2012

- Copy for information and necessary action to:-
1. Secretary Elementary and Secondary Education Khyber Pakhtonkhwa
 2. Director Elementary and Secondary Education Khyber Pakhtonkhwa.
 3. The District Coordination Officer Bannu
 4. District Officer Female E and SE Bannu
 5. DDO Female Primary Bannu with the remarks that their pay may not be drawn until and unless their testimonials are not verified from concerned Board/University.
 6. District Accounts Officer Bannu
 7. Registrar Peshawar High Court Bannu.
 8. Member inspection team Peshawar High Court Peshawar w/r to his order No.772/ dated 13-4-2012.
 9. Govt. Pleader Bannu

EXECUTIVE DISTRICT OFFICER
ELEM:AND SECY: EDU:BANNU
Executive Distt: Officer,
Elementary & Secondary Edu,
Bannu

Accepted
[Signature]

فاز الفوری

Annex-B

صحت کوال

انٹرنیشنل ڈسٹرکٹ ایمر ایلمنٹری اسکول

سائنڈری (گورنمنٹ) سکول ادارہ نمبر 4288-4192

فورم 4/23 اس وقت کے ایمر ایلمنٹری اسکول

سکول پیراڈیڈ (گورنمنٹ) سکول

فورم 23/2012 قبل از دہر کو ایمر ایلمنٹری اسکول

لہذا فوراً ارسال ہے

رکھ دیا گیا ہے ایمر ایلمنٹری اسکول

پیراڈیڈ

فعلی اطلاع

(1) انٹرنیشنل ڈسٹرکٹ ایمر ایلمنٹری اسکول (گورنمنٹ) سکول

(2) ڈسٹرکٹ ایمر ایلمنٹری اسکول

کارنل دیوالی

کارنل دیوالی

Govt. Girls Primary School
Piran Hawot - Tehsil Bahawal

Rahimda
PST

Prepared on: 06-05-2009

Asstt: Secretary

Mohammad
Secretary

SECRETARY

This certificate is issued without alteration or erasure



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
BANNU N-W.F.P PAKISTAN

S.No 214

14

Secondary School Certificate Examination

Detailed Marks Certificate

Roll No: 2574

Session: 2007 (Annual 10th)

Group: Humanities

Registration No: 2574-Pvt-2-07

Certificate No: 2070257

This is to certify that Rahimida

Son / Daughter of Bakht Ali Jan

and a student of District Bannu

has secured the marks shown against each subject, in the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu, held in April, 2007 as Private Candidate

Subject	Marks	MARKS OBTAINED			
		10Th		Total	In Words
		Theory/Paper-A	Practical/Paper-B		
1. English	150	46	42	88	Eighty-Eight
2. Urdu	150	46	46	92	Ninety-Two
3. Islamiyat	75	47	-	47	Forty-Seven
4. Pakistan Studies	75	48	-	48	Forty-Eight
5. General Science	100	64	-	64	Sixty-Four
6. Elements Of Home Economics	100	51	-	51	Fifty-One
7. Islamic Studies	100	57	-	57	Fifty-Seven
8. Mathematics	150	38	36	74	Seventy-Four

Total 900	521-C	Five Hundred Twenty-One Only
Remarks	Humanities Group	

Handwritten signature

Date of Birth according to Registration Record: 26-06-1985 (26 June, Nineteen Eighty-Five)

Date of declaration of Result: 16-07-2007

Prepared by: *[Signature]*

Checked by: *[Signature]*

Date of issue: 16-07-2007

[Signature]
Controller of Examinations
Board of Intermediate and
Secondary Education, BANNU

[Signature]

Headmaster:
G.H.S. Kotla Muhammad Kh... (COMPILED BY COMPUTER CELL UISE, Bannu)
84000

Note: Error / Omission excepted.

15

Roll No: 34622

Board of Intermediate & Secondary Education BANNU (N-W.F.P), PAKISTAN

BU:S.No. 023654



PROVISIONAL CERTIFICATE

INTERMEDIATE EXAMINATION

SESSION 2010 ANNUAL

Humanities Group

THIS IS TO CERTIFY THAT Rahmida

Daughter of Bakht Ali Jan

Student of Bannu District

Registration No. 08625-Pvt-1-09 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Bannu held in April, 2010 as a Private candidate. She obtained 672 marks out of 1100 and has been placed in Grade "B" Representing Very Good.

Result declaration Date: 21 July, 2010

Prepared by: [Signature]

Checked by: [Signature]
19/10/10

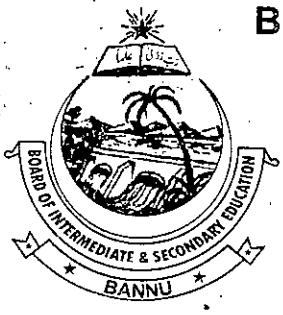
ASST. SECRETARY (CERTIFICATE)

Compiled by NoorKhan Computer Cell Certificate Section 21 July 2010

Muhammad Iqbal Khan

Headmaster
M.S. Kola, Muhammad Khas
Camp

16



**BOARD OF INTERMEDIATE & SECONDARY EDUCATION, BANNU
KHYBER PAKHTUNKHWA, PAKISTAN**

16712

Higher Secondary School Certificate Examination

S. No.

Detailed Marks Certificate

Roll No: 34622
Group: Humanities

Session: 2010 (Annual Part-II)

Registration No: 0862--Pvt--1-09

Certificate No: 21034622

This is to certify that Rahmida
Son / Daughter of Bakht Ali Jan
and a student of District Bannu

has secured the marks shown against each subject, in the Higher Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu, held in April, 2010 as Private Candidate

SUBJECTS	MAXIMUM MARKS				MARKS OBTAINED				Total	In Words
	Part-I		Part-II		Part-I		Part-II			
	Theory	Practical	Theory	Practical	Theory	Practical	Theory	Practical		
1. English	100		100		56	--	48	--	104	One Hundred Four
2. Urdu	100		100		54	--	73	--	127	One Hundred Twenty-Seven
3. Islamic Education	50				28	--	--	--	28	Twenty-Eight
4. Pakistan Studies			50		--	--	31	--	31	Thirty-One
5. Islamic Studies	100		100		69	--	64	--	133	One Hundred Thirty-Three
6. Islamic History	100		100		63	--	64	--	127	One Hundred Twenty-Seven
7. Civics	100		100		64	--	58	--	122	One Hundred Twenty-Two

Total Marks: 1100 Marks Obtained: **672-B** Six Hundred Seventy-Two Only

Remarks

Date of declaration of Result: 21-07-2010
Prepared by: [Signature]
Checked by: [Signature]
Date of issue: 21-07-2010

Mohammad Iqbal
Head of School
S.A.S. Kotla Muzaffargarh District
Bannu
Controller of Examinations

Note: Error / Omission excepted:

(COMPILED BY COMPUTER CELL BISE, BANNU)



UNIVERSITY OF SCIENCE & TECHNOLOGY BANNU

Khyber Pakhtunkhwa PAKISTAN

18

S.No:139110

DETAILED MARKS CERTIFICATE

Bachelor of Arts

Session: 2010-2012

Part-II Annual Examination Held in June, 2012



Name: Rahmida Roll No: 27836

Father's Name: Bakht Ali Jan Reg No: 2010-UB-BP-33789

Institute Name: Private Candidate

The Candidate has secured the following Marks and is placed in 2nd Division.

No.	Subjects	Max Marks	MARKS OBTAINED				Remarks
			Theory	Practical	Total	In Words	
1	Part-I	285		---	136	ONE HUNDRED THIRTY-SIX	
2	Islamic Studies (Elective)	75	55	---	55	FIFTY-FIVE	
3	Urdu	75	46	---	46	FORTY-SIX	
4	English (Comp)	75	31	---	31	THIRTY-ONE	
5	Pakistan Studies (Comp)	40	27	---	27	TWENTY-SEVEN	
Total		550			295	TWO HUNDRED NINETY-FIVE	

Note: Required Pass Percentage in each Subject (Written & Practical Separately) 33, Aggregate Pass Percentage 36

The Examination was taken as a Whole

Prepared by: [Signature]

Checked by: [Signature]

[Signature]

Controller of Examinations
University of Science & Technology, Bannu

U.S. Kota Bannu

Result Declaration Date	15-08-2012
Issue Date	15-08-2012



[Signature]

19



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Matr. No. 160382

PROVISIONAL RESULT CARD

Name RAHMIDA
Fathers's Name BAKHT ALI JAN
Address FARID MICRO PHOTO STATE TANCHI
Tehsil BAZAR BANNU
District BANNU

Roll No. 2651179
Registration No. 07NBU1797
Final Semester SPR- 2008

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Table with 5 columns: Semester, Course Code, Title of Course, Maximum Marks, Obtained Marks. Contains 9 rows of course data.

Handwritten signature of Headmaster and printed name: Headmaster, G. S. Khatun Muhammad Khos

CREDITS: 5

Total Marks / Obtained 900 / 607

Result Declared on MARCH 14, 2009

Percentage / Grade 67 B

Date of issue APRIL 04, 2009

Handwritten signature of Controller of Examinations

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing on this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, ELEMENTARY &
SECONDARY EDUCATION, BANNU

OFFICE ORDER

- 1-WHERE AS Miss Rahmida D/O Bakt Ali Jan was appointed as PTC/PST at GGPS Piran Daud Shah (Bilal) Bannu vide this office order Endst No: 4192-4288 dated 23-4-2012
- 2- AND WHERE AS Her S.S.C Certificate was submitted to the Board of Intermediate & Secondary Education, Bannu vide Dy: District Officer (Female) Primary Bannu No. 653 dated 29-5-2012 as per terms & conditions at S.NO.7 of the appointment order.
- 3-AND WHERE AS The Assistant Secretary (Certificate) Board of Intermediate & secondary Education, Bannu in his letter No. 1024/Certificate/BISE Bannu dated 30-5-2012 declared her S.S.C Certificate as Fake & Bogus.
- 4-AND WHERE AS In the light of Terms & Conditions at S.NO.7 of the appointment order, her appointment as PST/PTC at S.NO.22 in the appointment order of the Union Council Wise Merit, issued under Endst No. 4192-4288 dated 23-4-2012, is hereby cancelled/withdrawn from the date of taking over charge on the basis of Fake & bogus S.S.C Certificate.

(SARAF ALI SHAH)
EXECUTIVE DISTRICT OFFICER,
ELEMENTARY & SECONDARY
EDUCATION, BANNU.

Endst No. 742-48 /DO (F/S) PTC

Dated Bannu the 8/6 /2012.

Copy for information to:-

- 1- District Coordination Officer, Bannu
- 2- Director Elementary & Secondary Education, Khyber Pakhtoonkhwa, Peshawar.
- 3- Deputy District officer (Female) Primary Bannu for information and necessary action with reference to her No. 515 dated 5-6-2012
- 4- Executive District Officer Elementary & Secondary Education, Bannu with reference to his approval vide Para No. 3 dated 5-6-2012.
- 5- District Accounts Officer, Bannu.
- 6- Rahmida D/O Bakht Ali Jan Village Mushar Daud Shah Bannu
- 7- Head Teacher GGPS Piran Daud Shah (Bilal) Bannu.

Saraf Ali Shah
8/6/12
DISTRICT OFFICER, (FEMALE)
ELEMENTARY & SECONDARY
EDUCATION, BANNU

Received on 6/7/12

Saraf Ali Shah
6/7/12

ایگزیکٹو ڈسٹرکٹ آفیسر ایڈمنسٹریشن ریڈیو میکانکری اینڈ ایکسپریس سٹیشن ضلع بنوں
 درخواست نمبر: 2010 (ایگزیکٹو ڈسٹرکٹ آفیسر ایڈمنسٹریشن ریڈیو میکانکری اینڈ ایکسپریس سٹیشن ضلع بنوں)
 (ایگزیکٹو ڈسٹرکٹ آفیسر ایڈمنسٹریشن ریڈیو میکانکری اینڈ ایکسپریس سٹیشن ضلع بنوں)

65

نام: محمد علی خان
 پتہ: بنوں
 تعلیم: بی۔ اے
 پیشہ: پرائیویٹ
 پتہ: بنوں
 تعلقہ: بنوں
 ڈسٹرکٹ: بنوں
 ایڈریس: بنوں
 پتہ: بنوں
 تعلقہ: بنوں
 ڈسٹرکٹ: بنوں
 ایڈریس: بنوں
 پتہ: بنوں
 تعلقہ: بنوں
 ڈسٹرکٹ: بنوں
 ایڈریس: بنوں

تعمیری و پیشہ ورانہ قابلیت - (Office phone no: 615515) (ریکارڈنگ دفتر استعمال کیلئے ہے)

امتحان	سال پاس کردہ	پاس کردہ نمبر	کل نمبر	فارمولہ
پہلی	2007	521	900	= 30 X
دوئم	2010	672	1100	= 20 X
تیسرے	2012	795	550	= 10 X
چوتھے	-	-	-	= 10 X
پنجمے	2009	607	900	= 25 X
ششمے	-	-	-	-
سابعے	-	-	-	-
آٹھمے	-	-	-	-
نہمے	-	-	-	-
دہمے	-	-	-	-

متملقہ برائے ریجنل کونسل ناظم، حلقہ بنوں، تحصیل بنوں، ضلع بنوں
 محمد علی خان
 Headmaster
 GHS Khatkhata
 Board

متملقہ برائے ریجنل کونسل ناظم، حلقہ بنوں، تحصیل بنوں، ضلع بنوں
 محمد علی خان
 Headmaster
 GHS Khatkhata
 Board

متملقہ برائے ریجنل کونسل ناظم، حلقہ بنوں، تحصیل بنوں، ضلع بنوں
 محمد علی خان
 Headmaster
 GHS Khatkhata
 Board

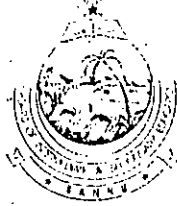
Annex-E (22)

DU.S.No. 030406

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 2574

Board of Intermediate & Secondary Education
BANNU (N-W.F.P.), PAKISTAN.



SECONDARY SCHOOL CERTIFICATE EXAMINATION

SESSION 2007 ANNUAL

Checked & Verified
Found Correct

This is to Certify that Rahmida

[Signature]
Secretary

Daughter of

Bakht Ali Jan

10/1/13

Student of

District Bannu

has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu held in April, 2007 as a Private candidate.

She obtained 521 marks out of 900 and has been placed in Grade

C

Representing Good.

The candidate passed in the following subjects:

1. English	2. Urdu	3. Istamiyat	4. Pakistan Studies
5. General Science	6. Elements Of Home Economics	7. Islamic Studies	8. Mathematics

Date of birth: (26-06-1985) in words: 26 June, Nineteen Eighty-Five.

Registration No: 2574-Pvt-2-07

Date of declaration of Result: 16-07-2007

Prepared on: 06-05-2009

[Signature]
Asstt: Secretary

[Signature]
SECRETARY

This certificate is issued without alteration or erasure

A Annex-F (23)

BEFORE THE LEARNED DISTRICT COORDINATION OFFICER BANNU.

Mst.Rahmida D/O Bakht Ali Jan village Mushar Daud Shah Bannu.
.....Appellant.

VERSUS

1. EDO(E&SE)Bannu.
2. DO Female (E&SE)Bannu.
3. Dy.DO(F) (E&SE) Bannu.

.....Respondents

REQUEST FOR RE-INSTATMENT AS PST BY DIRECTING RESPONDENT NO.2, TO WITH DRAW THE IMPUGNED TERMINATION ORDER AND ALSO DIRECT HER NOT TO EXERCISE THE POWERS FOR WHICH SHE IS NOT COMPETENT AS PER JOB DISCRPTION AND PREVAILING POLICY.

Respectfully Sheweth,

The appellant humbly submit as under

RECEIVED
No. <u>5856</u>
Dt. <u>19-7-2012</u>
Return date _____
Deputy Commissioner Officer Bannu

Brief Facts.

1. That the appellant was appointed as PST at GGPS Piran Daud Shah Bannu vide EDO(E&SE)NO.4192-4288. the dated 23-04-2012.(copy of the appointment is annexed as Annexure "A")
2. That the appellant has now been terminated vide Endst.NO.742-48/DO(F/S)PTC the dated 08/06/2012, received on 06-07-2012.(copy of the termination order is annexed as Annexure "B").
3. That the termination order was issued on the basis of tampering in the SSC certificate, which the appellant does not own.
4. That the certificate of SSC submitted by the appellant is issued by the BISE Bannu is accurate in all respects(copy of the SSC is annexed as Annexure "C").
5. That due to some clerical mistake committed during the feeding of data by the officials have created the present confusion which resulted in the termination of the appellant.
6. That Respondent NO.2 has no such powers to issue termination orders as per job description and prevailing policy.
7. That as per General Clauses Act, if an incompetent authority commits any action for which he/she is not authorized in normal practice then such a person will become competent to correct the mistake committed.

Appellant
h

Annex I

Mst. Rahmida VS District Coordination Officer Bannu & Others Service Appeal

NWFP No.240 GS&PD NWFP-1675-F.S-10,000 PADS-7.3.95-(26)/Disk-9
Date of Order or Proceedings: 02.7.2013
Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary

ORDER


This is a service appeal filed by the appellant against the orders dated 25.10.2012 passed by District Coordination Officer Bannu, the respondent, whereby appointment of the appellant for re-instatement as Primary School Teacher (PST) was dismissed and the order dated 08.06.2012 issued by Executive District Officer, Elementary & Secondary Education, Bannu was maintained.

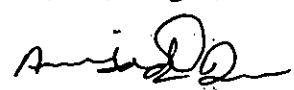
Brief facts of the case are that the appellant was appointed as Primary School Teacher (PST) on 23.04.2012 by Executive District Officer(E&S) Education Bannu. After verification from Board of Intermediate & Secondary Education Bannu her Secondary School Certificate was declared fake & bogus and thus she was terminated from service by EDO (E&S) Education Bannu through an order dated 08.06.2012. Her appeal against the said orders was dismissed by DCO Bannu and the orders of EDO (E&S) Education Bannu were maintained.

Notice was issued to the respondent department and comments were sought from them. Secondary School Certificate and Higher Secondary School Certificate of the appellant were verified from Board of Intermediate & Secondary Education Bannu and were found genuine. Fake certificate of the appellant was re-verified from B.I.S.E Bannu on 17.06.2013 and was found bogus.

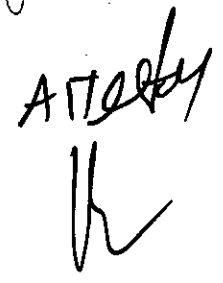
Appellant present through attorney, counsel for the appellant and representative of the respondent (EDO, E&S Education Bannu) also present and heard. Comments of respondent department also perused. Since the appellants was appointed through fake and bogus Secondary School Certificate which provided merit to her but as per her genuine Secondary School Certificate she does not come on merit. The instant appeal is, therefore, dismissed and the orders passed by respondents are maintained.

Announced.
02.07.2013


COMMISSIONER
BANNU DIVISION.

Attested

Reader to Commissioner
Bannu Division

15-7-2013

Attorney


- D. As appointment of the appellant was made on the recommendations of Department Selection Committee, therefore, it means that verification of her academic qualification was already verified from the concerned Board by the Respondent No.2.
- E. Furthermore, the Department Selection Committee's recommendation in respect of the appellant's appointment is a clear justification of authenticity of the appellant case as being genuine.
- F. That copies of academic qualifications from SSC to BA of the appellant are genuine as enclosed as (Annex-II).
- G. That Respondent No.3 is not competent to issue cancellation/withdrawal order of the appellant under the rules, and therefore, illegal and unlawful.
- H. That Respondent No.1 has not examined/perused the case of the appellant thoroughly and issued his impugned order dated 25-10-2012 in a hasty and haphazard manner.

In view of the above facts and circumstance, it is humbly prayed that on acceptance of this appeal, the impugned order dated 25-10-2012 passed by the Respondent No.1 and order dated 08-06-2012 passed by the Respondent No.3 (cancellation/withdrawal's order of the appellant) may be set aside and the appellant may please be re-instated into service with all service back and benefits.

Yours Obediently,

Attest
[Signature]

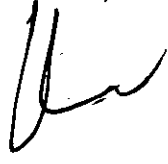
Rahmida.
MST. RAHMIDA
D/O BAKHT ALI JAN
Through her Husband.

عزیز علی خان

- 5. That after aggrieved from the Respondent No.3 above impugned order, the appellant filed a Departmental Presentation before the Respondent No.1 i.e. District Coordination Officer, Bannu for her re-instatement as Primary School Teacher (Annex E).
- 6. That Respondent No.1 vide his impugned order bearing No.4332/DCO/AE/PST, dated 25-10-2012 dismissed the appeal of the appellant and maintained the order of Respondent No.3. (Annex F)

GROUNDS:

- A. That the impugned order of Respondent No.3 dated 08-06-2012 is illegal, unlawful and passed in very haphazard and hasty manner as neither proper procedure of Khyber Pakhtunkhwa Govt. Servants (E&D) Rules 2011 was adopted by the Respondent No.3 nor the appellant was given any chance of personal hearing.
- B. That Respondent No.2 is a 'competent' authority in respect of the appointment/dismissal of the Primary School Teachers. All appointments/terminations of Primary School Teachers as per the rules are made on the signature of the Respondent No.2 being competent authority. Though the appointment order of the appellant is signed by the Respondent No.2, however, her cancellation/withdrawal order have been signed by Respondent No.3 who is not a-competent, and therefore, the same is illegal and unlawful.
- C. That as per the procedure, the competent authority, before issuance of appointment order of the appellant, should have sent her academic qualifications to the concerned Board/University for verification, and after getting verification of her academic qualification from the concerned Board/University, the Respondent No.2 was competent to either place the case of appellant before Department Selection Committee or withdraw the same on pretext of any illegality in her educational qualification.

Attest


(2)

16

Annex-H

(26)

BEFORE THE COMMISSIONER, BANNU DIVISION

Mst. Rahmida D/O Bakht Ali Jan village Mushar Daud Shah, Bannu ----- Appellant

Versus

1. District Coordination Officer, Bannu.
2. Executive District Officer (E&S) Education, Bannu.
3. District Officer (Female) (E&S) Education, Bannu.----- Respondents

APPEAL AGAINST THE ORDER BEARING NO.4332/DCO/AE/PST, DATED 25-10-2012 PASSED BY DISTRICT COORDINATION OFFICER, BANNU WHEREBY APPEAL OF THE APPELLANT REGARDING RE-INSTATEMENT AS PRIMARY SCHOOL TEACHER (PST) WAS DISMISSED AND EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION ORDER BEARING NO.742-48, DATED 08-06-2012 WAS MAINTAINED.

Attested
And
Reader to Commissioner

Bannu Division

Respectfully Sheweth,

15-7-2013

The appellant humble submission is as under:-

FACTS:-

8297
22 - 11 - 12

1. That the appellant was appointed as Primary School Teacher (PST) vide Respondent No. 2 i.e. Executive District Officer (E&S) Education, Bannu order bearing endorsement No. 4192-4288/AE-I/Female PST/2012, dated 23-04-2012 and was posted in Govt. Primary School Piran Daud Shah Bilal vide the same order. (Annex A)

That appointment of the appellant as Primary School Teacher was made sheer on merit basis as per her educational/academic qualifications (Annex B).

That the appellant submitted her arrival report on 22/11/12 (Annex C)

However, appointment of the appellant was cancelled/withdrawn by the

Respondent No.3 on the basis of fake & bogus of S.S.C. certificate vide

order bearing endorsement No.742-48/DO (F/S)PTC, dated 08-06-

Attested
u

OFFICE OF THE DISTRICT COORDINATION OFFICER BANNU

No 4337/DCO/AE/PST

Dated 25/10/2012

TO,

Mst: Rahmida D/o Bakht Ali
R/o Musher Daud Shah Bannu

Subject: **APPEAL FOR RE-INSTATEMENT IN SERVICE**

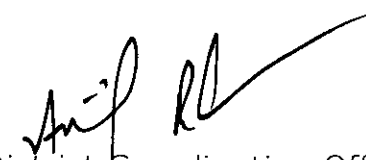
Memo:

Reference your appeal dated 19/07/2012 for re-instatement in service.

The verification of your SSC and HSSC received from Assistant Secretary Board of Intermediate and Secondary Education Bannu reveals that you have tempered the certificates and increased your marks therein with un-fair means.

According to your actual marks obtained in SSC and HSSC duly verified by the BISE Bannu, your score as shown in the merit list could not be justified and your appointment as PST ^{to be} seems not eligible.

Your appeal is hereby dismissed and termination order issued by EDO (E&SE) Bannu vide No.742-48/DO(F/S)PTC dated 08/06/2012 is seems to be quite genuine and kept intact.


District Coordination Officer,
Bannu

Even No & date

Copy forwarded to Executive District Officer (E&SE) Bannu for information with reference to above.


District Coordination Officer,
Bannu

- 8. That the termination order has been issued with out prior notice and non observance of codal formalities which shows the malafide intention of Respondent NO. 2 therefore. in effective on the rights of the appellat.
- 9. That as per justification of vacant posts displayed on the notice board, vacant posts were available in the union council of the petitioner, therefore the appellat could be appointed and there was no need for tampering as stated in the allegations leveled against the appellat.
- 10. That the appellat can't be penalized for placing the tampered certificate of SSC by the officials in place of actual certificate dually verified.

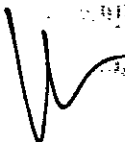
It is therefore, requested that on acceptance of the instant appeal, the appellat may very graciously be re-instated by set a siding the base less allegations from the date of termination.

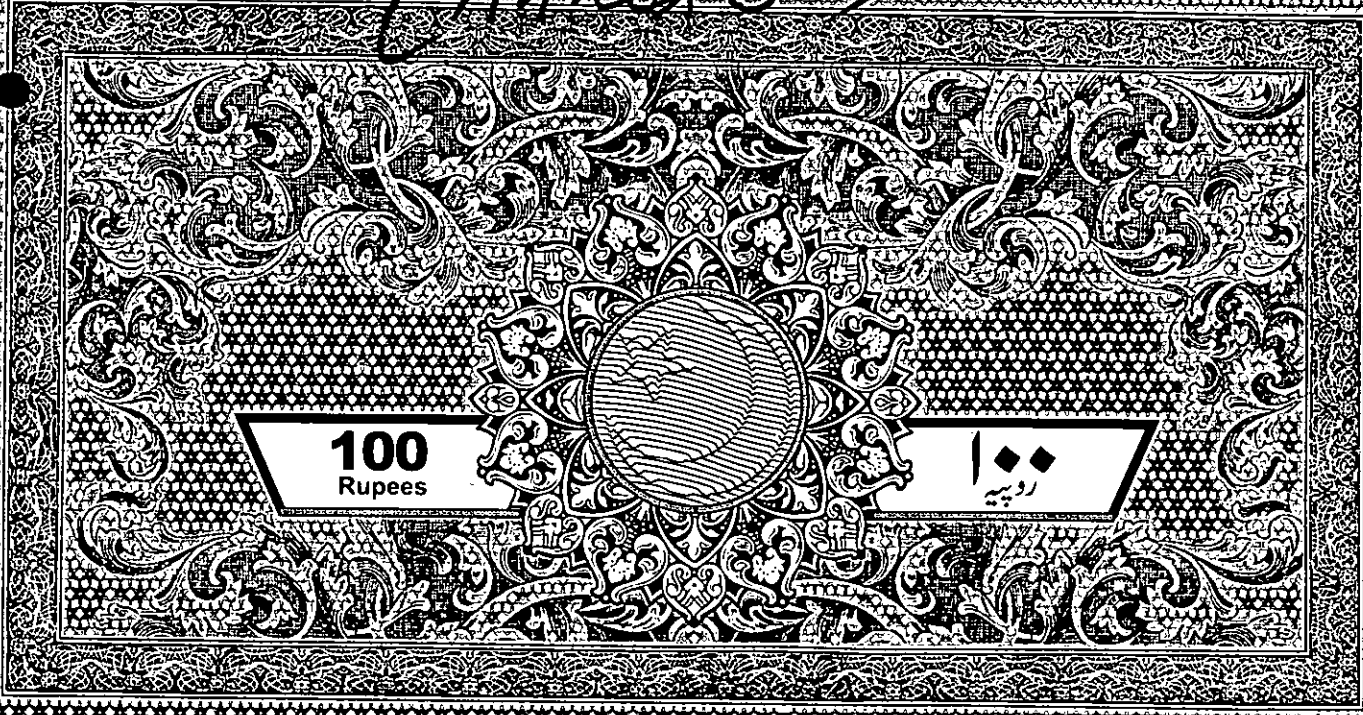
Rahmida
 Mst.Rahmida D/O Bakht Ali Jan village Mushar
 Daud Shah Bannu.

AFFIDAVIT.

Certified that all the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed.

Rahmida
 Mst.Rahmida D/O Bakht Ali Jan village Mushar
 Daud Shah Bannu.

Attesty




100 Rupees

۱۰۰ روپیہ

صنایع چیمبر میں سرورس ٹرڈ مینز اےسوسی ایشن کے نام پر 100 روپے کا چیک



اصحیحہ بنام سکریٹری ایلویشن

سرورس ایلویشن

جو کہ اس وقت صحت مند عمل بقائم ہوئی ہو اور اس کا دائرہ عمل

کے لئے وسیع ہو۔ کہ جس قدر جوہر ذاتی طور پر دستیاب اور بردہ نشینی

عملت انجمن میں قدرہ نامہ سبکی کی پوری کرنے سے قاصر ہوں

میں وجہ اپنا خاوند مسی طرف خان کو حتمی راضی قرار دیتا ہوں:

حتمی راضی کو اختیار حاصل ہوگا۔ کہ وہ میری طرف سے ہیں

درخواست دیں۔ جواب در فورست دیں۔ جواب ایلویشن



12/8/13

میرست گورنمن دیں۔ خرچہ گورنمن چیمبر میں گورنمن میں خرچ کریں

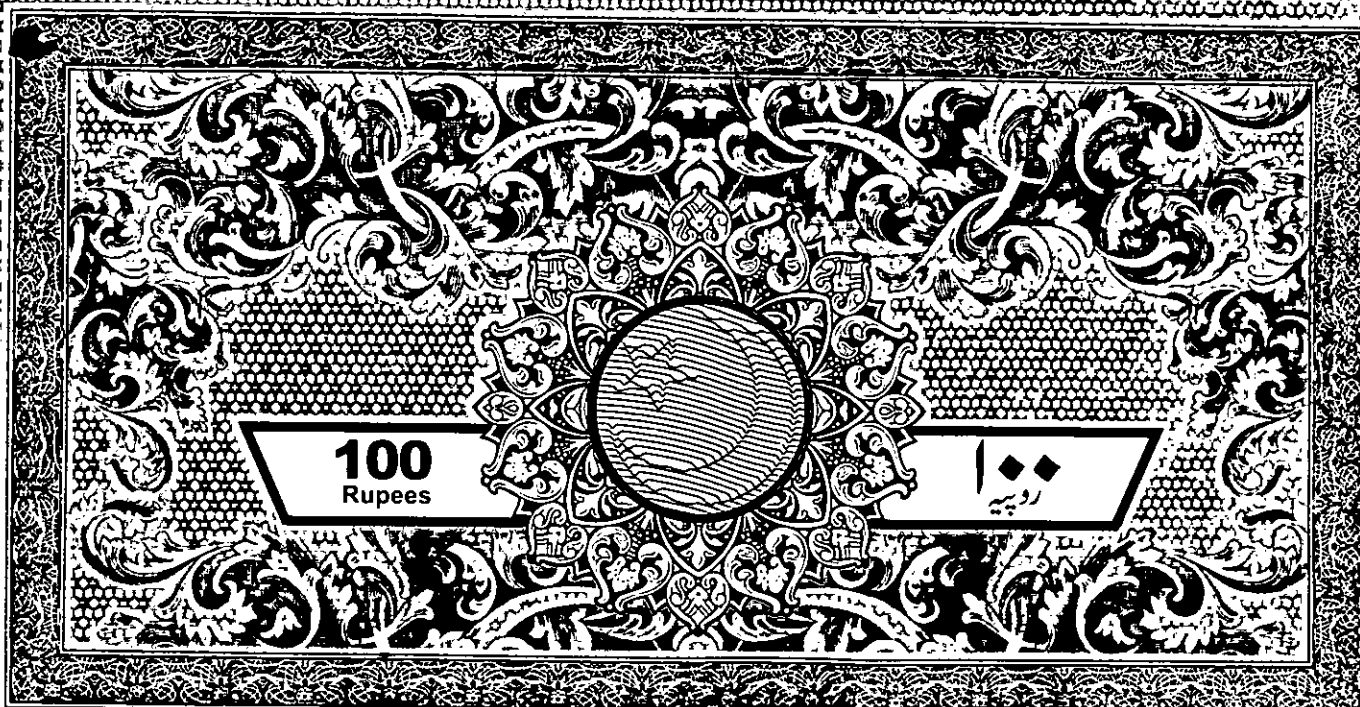
اسی کریں۔ در حقیقت اس میں کریں۔ گورنمن میں حتمی راضی حتمی حتمی

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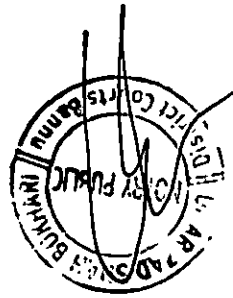
P 3



گواہ شد: شاہ دراز و لہ زرا دود خان سعید
بازار المہمان بنوں

5-1858575-11101

شہسزاد علی خان دست محمد علی گورکھ پور



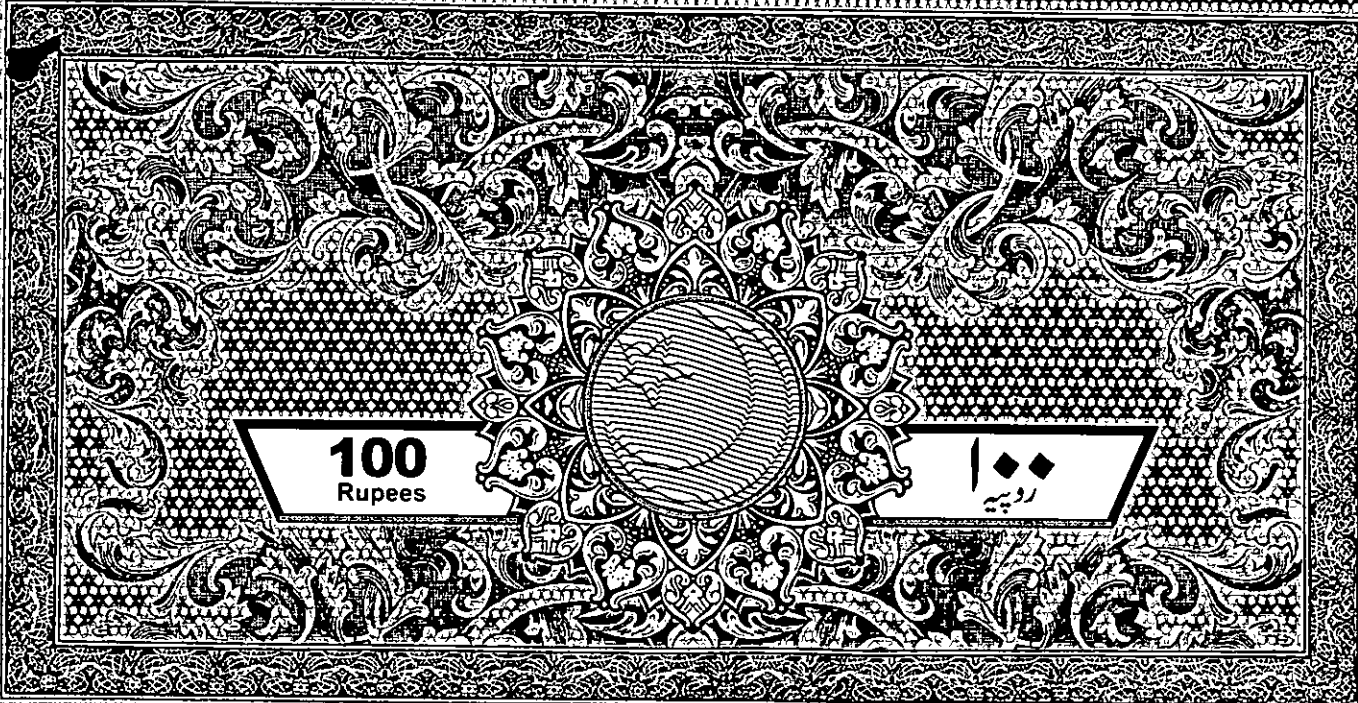
گواہ شد: شہسزاد علی خان

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100 Rupees

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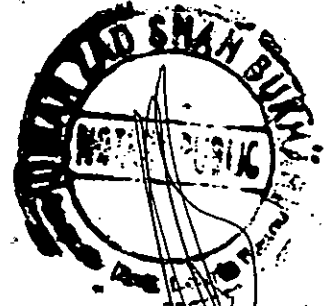
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یہ دوائی گریہ - مقدم عنوانیہ بالہ و درپس گریہ، اوسل عقر گریہ، اوسل کو
 تیس اد گریہ، یا اوسل مقدم عنوانیہ بالہ سے اگ گریہ
 نیز عتبار خاص و مع عام رضیارات سافہ ہر دافہ حاصل سے
 جو کہ حق عقرہ کو حاصل سے لہذا محنتا زانم خاص فہ سند گریہ

12-8-13

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Vertical text: 11101-6910924-1



محمد ظریف خان رضیارات گریہ

گمبذہ رضیارات گریہ

11101-6910924-1

Rahimuda



Handwritten signature

12/8/13

14/8/13 Page 3

Annex-K

مورہ 13/8/13

۲۰۱۳ء جناب سائید

بنام سکرٹری ایجوکیشن و فیس سروس

مقدمہ رضیہ سائید
دعویٰ سروس ایس
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ ان مقام پیش اور کے لئے سکرٹری در دستا ہ بخاری اور دیگر مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو راضی نامہ و مقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تارتخ پیشی مقام دورہ پر ہوگا تھانہ باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی مقدمہ مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

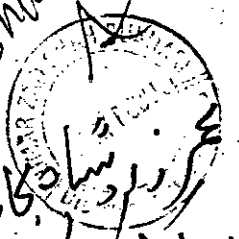
المرقوم 13 ماہ اگست ۲۰۱۳ء

العبد گواہ شہد اللہ العبد

Attest

رضیہ منیرہ منیرہ

Accepted



دستور ایجوکیشن سروس

WAKALATNAMA

IN The Hon'ble KPK Service Tribunal, Peshawar.

Rahmide

(Petitioner)
(Plaintiff)
(Applicant)
(Complainant)
(Decree Holder)

VERSUS

Govt. of KPK & others

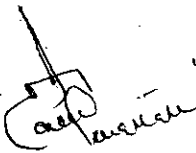
(Respondent)
(Defendant)
(Accused)
(Judgment Debtor)

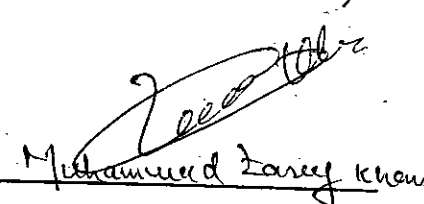
Case Service Appeal no. 12013

I/We, Muhammad Zareef Khan
Special Attorney for Appellant do hereby appoint and constitute **Muhammad Saeed Khattak. Advocate** High Court, Peshawar, to appear. Plead, act, compromise, withdraw or refer to arbitration to me/ us as my/ our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/ Counsel at my/ our matter.

Attested & Accepted

CLIENT/S


Muhammad Saeed Khattak
Advocates, C-10, Haroon Mansion,
Khyber Bazar, PESHAWAR
Cell#. 03458383641
0333.6272753


Muhammad Zareef Khan
Special Attorney for
Appellant

Fawad Ahmad
Attaman Khell
Advocate

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1247/2013

Mst. Rahmida

Vs

Government of KPK & others

REJOINDER TO THE PARAWISE COMMENTS

Respectfully Sheweth,

REJOINDER TO PRELIMINARY OBJECTIONS:

1. Incorrect, the appellant has a good cause of action and locus standii.
2. Incorrect, the service appeal is not bad for non-joinder and misjoinder of necessary parties.
3. Incorrect, the service appeal is quite maintainable in its present form.
4. Incorrect, the service appeal is not suffering from any legal and factual defects.
5. Incorrect, the appellant's appointment order has illegally and unlawfully been withdrawn by the incompetent authority with mala fide intentions. The appellant never submitted tempered/faked certificate of her. The form submitted in the office of respondent No.2 along with pre-requisite documents before her appointment testifies her original marks etc.
6. Incorrect the appellant has come to this court with clean hands.

REJOINDER ON FACTS:

1. Needs no rejoinder.
2. In rejoinder to para 2 it is submitted that appellant's appointment has been admitted by the respondents. So far the question of verification of her SSC is concerned no verification report has been produced in this behalf. On the other hand the appellant has attached all her academic testimonials, the form for the process of appointment and the verification of SSC certificate from BISE Bannu, which support the appellant's stance/case.
3. Incorrect, hence denied, nothing has been brought on record before this hon'ble Tribunal regarding the appellant's SSC certificate, while the appellant has submitted verification certificate from the concerned board. Otherwise too her appointment order has been withdrawn by incompetent authority.
4. As mentioned in the memo of appeal.
5. As mentioned in the memo of appeal.
6. The grievance of the appellant has been admitted. However no limitation runs against the void order, otherwise too, the apex courts have favored the cases to be decided on merits rather on technicalities including the limitation.

REJOINDER ON GROUNDS:

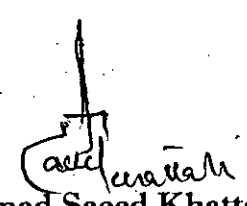
- A. Incorrect, hence denied, the impugned order is illegal, unlawful in a hap hard manner and is totally based on presumption without consulting the material available before them by the incompetent authority in violation of Rule 5 of the KPK Civil Servants (Appeal) Rules, 1986.
- B. Incorrect, the appellant submitted her genuine academic testimonials which was/were verified by BISE and that verification certificate is also available on main file.

- C. Ground C regarding the appellant's appointment has been admitted but has not brought on record anything regarding her documents which they claim as bogus. They have neither brought on record her secondary school certificate which the respondents claim to be bogus and submitted before the appointing authority nor any verification certificate.
- D. Incorrect, detail discussion regarding the same has already been mentioned in the above paras.
- E. As mentioned in the memo of appeal'
- F. As above.
- G. As above.
- H. As above.

It is therefore most humbly prayed that on acceptance of the instant rejoinder the comments of the respondents be rejected and the appeal of the appellant be kindly allowed as per prayer.

Appellant

Through



Muhammad Saeed Khattak
Advocate, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA

TRIBUNAL, PESHAWAR.

Service Appeal No. 1496/2013



Shahnaz Begum D/o Sair Ullah Shah R/o Akhundun Jhandu
Khel Tehsil and District Bannu.Appellant.

Versus

1. The Director Education (E & SE) Govt: of KPK,
Dubgari Gardan, Peshawar.
2. The District Education Office, (Female) (E & SE),
District Bannu.
3. The District Account Officer, District Bannu.
4. The Commissioner Bannu Division, Bannu.
.....Respondents.

1587
14-10-13

SERVICE APPEAL UNDER SECTION 4 OF THE
SERVICE TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED ORDER DATED 13-06-2013 OF
RESPONDENT NO.2, WHEREIN HE HAS
WITHDRAWN THE VALID APPOINTMENT ORDER
DATED 23-04-2012 AND SET ASIDE THE SAME AND
ALSO RE-INSTATE THE APPELLANT WITH ALL
BACK BENEFITS AND ALSO DIRECT THE
RESPONDENT TO GRANT/RELEASE THE
OUTSTANDING SALARIES (23-04-2012 TO 13-06-2013)
OF THE APPELLANT WITH ALL ATTACHED
BENEFITS.

14/10/13

re-submitted to ~~dep~~
and filed.

Prayer in Appeal:-

On the acceptance of the instant service appeal this Honourable Tribunal may graciously be pleased to declare the impugned order dated 13-06-2013 passed by the respondent No.2, wherein he has withdrawn the valid appointment order dated 23-04-2012 of the appellant; as illegal, unlawful, without

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar



Order or other proceedings with signature of judge or Magistrate

S.No
Date of
order
proceeding
s

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO.1496/2013

(Shahnaz Begum-vs- Director Education (E&SE) Govt: of Khyber Pakhtunkhwa,
Dubgari Gardan, Peshawar and others).

18.04.2016

JUDGMENT

PIR BAKHSH SHAH, MEMBER:

Counsel for the appellant (Ms. Uzma Syed, Advocate) and Mr. Usman
Ghan, Sr.GP for respondents present.

2. Appointed as PST vide order dated 23.4.2012, the appellant was sacked
from service vide impugned order dated 13.06.2013 by withdrawing the said
appointment order. The ground given is that her SSC certificate was tampered.
Her departmental appeal has not been responded, hence this service appeal under
Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act-1974.

3. Arguments heard and record perused.

4. It was submitted by learned counsel for the appellant that she never
tampered any SSC certificate. It was argued that no show cause notice or enquiry
was conducted or opportunity of personal hearing was given and all of a sudden
the appointment order was withdrawn. It was further argued that the SSC
certificate if any sent for verification was so sent by respondent-department on its
own and appellant was unaware of the same.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

5. The learned Sr. GP resisted the appeal on the ground that total number SSC is 1050 and in order to enhance merit position, the appellant tampered with this figure by forging total as 850. He further submitted that according to Clause 7 of the appointment letter, the appellant is estopped to bring this appeal. I prayed that the appeal being devoid of any merits may be dismissed.

6. After perusal of the record and hearing pro & Contra arguments, it was found that no show cause notice was issued to the appellant as to whether she had declared total number to be 1050 or 850. She denies that she tampered any figure in her SSC certificate. Contrarily, the department has not disclosed any merit list etc of selectees as to how the appellant enhanced her merit position by the alleged tampering. The record is insufficient and this Tribunal cannot reach or draw a just and a fair conclusion as to whether the appellant in-fact had tampered with her SSC certificate and whether through the said tampering the merit position was really changed? Hence the Tribunal in these circumstances, is constrained to remit the case to the appellate authority with the direction to decide departmental appeal of the appellant by dealing with the above points/observation but strictly on merit, within a period of one month after receipt of this judgment. Appeal is disposed of in the above terms. Parties are left to bear their own cost. File is consigned to the record room.

(1) *M. Pir Bathsh Shah,*
Member

(2) *M. Abdul Latif,*
Member

Certified to be true copy
EXCISE
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

ANNOUNCED
18.04.2016

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No: 1483 /ST

Dated 9 / 9 / 2016


To

The D.C.O,
Bannu.

Subject: - **JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 29.08.2016 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.