

28.05.2018 Bench is incomplete. To come up for order
on 31.05.2018 before D.B



Member

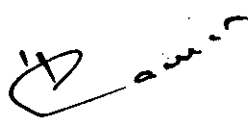
31.05.2018 Learned counsel for the appellant present. Mr. Kabir
Ullah Khattak learned Additional Advocate General for the
respondents present.

Vide separate common judgment of today placed on file of
service appeal bearing No.298/2016, this Tribunal is constrained to
issue direction to the respondent department to adjust/reinstate the
appellant at the post C.T with immediate effect without back
benefits. The present service appeal is accepted in the above terms.
Parties are left to bear their own costs. File be consigned to the
record room.

ANNOUNCED

31.05.2018


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

10.04.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Last opportunity granted. To come up for record and arguments on 23.04.2018 before the D.B.


Member


Chairman

23.04.2018

Learned counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General alongwith Ahmad Khan AEO for the respondents present. Arguments heard. To come up for order on 09.05.2018 before D.B


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

08.05.2018

The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come on 28.05.2018


READER

08.02.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Superintendent for the respondents present. Due to shortage of time, arguments could not be heard. To come up for record and arguments on 29.03.2018 before the D.B.


Member


Chairman

29.03.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Adjourned. To come up for record and arguments on 04.04.2018 before D.B.



Member


Chairman

04.04.2018

Counsel for the appellant and Addl; AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for record and arguments on 10.04.2018 before D.B.



(Ahmad Hassan)
Member


(M. Hamid Mughal)
Member

17.08.2017

Junior to counsel for the appellant and Asstt. AG alongwith Daud Jan, Superintendent for the respondents present.

Since the matter in controversy has already been resolved by the judgment of Hon'ble Peshawar High Court reported as PLD 2014-Peshawar-132, there is no need to decide this issue any further. The matter may be put up before the D.B for decision on merits. To come up for arguments before the D.B on 29.11.2017.



(M. Hamid Mughal)
Member

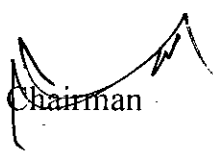

Chairman

(Ahmad Hassan)
Member

29.11.2017

Counsel for the appellant Mr. Ziullah, DDA alongwith Mr. Daud Jan, Supdt for the respondents present. Representative of the respondents is directed to bring enquiry report and other documents. To come up for such record and arguments on 08.02.2018 before the D.B.


Member


Chairman

07.03.2017

Counsel for the appellant and Addl: AG for respondents present. Rejoinder submitted. To come up for arguments on 10.07.2017 before D.B.


(MUHAMMAD AAMIR NAZIR)
MEMBER


(ASHFAQUE TAJ)
MEMBER

10.07.2017

Counsel for the appellant and Muhammad Jan, Government Pleader for the respondents present. Vide our detailed order of to-day in service appeal No. 261/2016, entitled "Hamid Ullah Khan Versus Director of Education FATA, FATA Secretariat, Peshawar and others" a special bench of 3 members is constituted in which Mr. Muhammad Hamid Mughal, Learned Member (Judicial) shall also be included in addition to the present bench. To come up for arguments on the point of jurisdiction on 17.08.2017.


Member


Chairman

24.08.2016

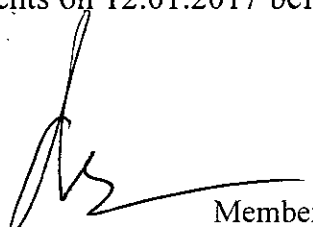
Clerk to counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl. AG for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity is extended. To come up for written reply/comments on 3.11.2016 before S.B.



Member

03.11.2016

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for further adjournment. Another last opportunity is extended. To come up for written reply/comments on 12.01.2017 before S.B.



Member

12.01.2017

Counsel for the appellant and Mr. Daud Jan, Superintendent alongwith Additional AG for respondents present. Written statement by respondents No. 2 & 3 submitted. Learned Additional AG relies on the same on behalf of respondents No. 1 & 4. The appeal is assigned to D.B for rejoinder and final hearing for 07.03.2017 before D.B.



Chairman

14.4.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as C.T (BPS-15) GHS Kochi Kuram Agency when terminated from service vide impugned order dated 11.12.2015 on the allegations of irregularities in his appointment where-against he preferred departmental appeal on 18.12.2015 which was not responded and hence the instant service appeal on 28.03.2016.

That appointment of the appellant was made in accordance with provisions of Rule-10 of Khyber Pakhtunkhwa Civil Servants (Appointments, Promotion and Transfer) Rules, 1989 and that there was neither any illegality nor irregularity in the said appointment and, moreover, neither any enquiry was conducted nor any opportunity of hearing extended to the appellant.


Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 15.06.2016 before S.B.

deposited
Security & Process Fee


Chairman

15.06.2016




Counsel for the appellant and Asstt. AG alongwith Daud Jan; Supdt. for the respondents present. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 24.08.2016 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 300/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.03.2016	<p>The appeal of Mr. Aqib Zaman presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	29.3.16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>12.4.16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	2.04.2016	<p>Junior to counsel for the appellant present. Seeks adjournment. Case is adjourned for preliminary hearing to 26.4.2016.</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 300 /2016

K.W.F. Province
Service Tribunal
Diary No. 283
Date 28-03-2016

Mr. Aaqib Zaman, Ex: C.T (BPS-15),
Govt: High School Bagan, Kurram Agency..... **APPELLANT**

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat, Warsak Road, Peshawar.
- 2- The Director of Education FATA, FATA Secretariat, Warsak Road, Peshawar.
- 3- The Additional Agency Education Officer, Lower & Central Kurram Agency at Sadda.
- 4- The Agency Account Officer, Kurram Agency.

..... **RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 11.12.2015 WHEREBY THE SERVICES OF THE APPELLANT HAS BEEN TERMINATED WITH EFFECT FROM THE DATE OF HIS APPOINTMENT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned order dated 11.12.2015 may be set aside and the respondents may be directed to re-instate the appellant with all back benefits w.e.f the date of his appointment. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

Handwritten signature and date
28/3/16

- 1- That the respondent No.3 through advertisement published in the Daily News Paper advertised various posts including the post of C.T (BPS-09) now (BPS-15). Copy of the advertisement is attached as annexure **A.**
- 2- That appellant having the Domicile of Kurram Agency and having the requisite qualifications for the said post applied and after participated in the test and interview the appellant was declared successful in the said selection process. That in

consequence the appellant was offered the said post through appointment order dated 18.01.2013. Copies of the Domicile Certificate, Education Testimonials and appointment order are attached as annexure **B, C & D.**

3- That in response to the said appointment order the appellant submitted his charge report along with medical certificate and started performing his duty at the concern station quite efficiently and up to the entire satisfaction of his superiors. Copies of the charge report and medical certificate are attached as annexure **E & F.**

4- That the service book of the appellant is also been prepared by the respondent No.3 and proper entry regarding the appointment of the appellant has been made by the respondent No.3 in the said service book of the appellant. That astonishingly right from appointment the salaries of the appellant has been withheld by the respondents without assigning any reason and clear justification. Copies of the service book and service certificate are attached as annexure **G & H.**

5- That appellant time and again visited the concerned quarter for the release of his salaries but of no avail, feeling aggrieved from the inaction of the respondents by not releasing the monthly salary of the appellant the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. W.P. 3602-P/2014 which is still pending adjudication before the august Peshawar High Court Peshawar. Copy of the Memo of writ petition No WP 3602-P/2014 is attached as annexure **I.**

6- That astonishingly the respondent No.3 issued the impugned order dated 11.12.2015 whereby the services of the appellant has been terminated with retrospective effect without conducting regular inquiry and without assigning any reason/clear justification. Copy of the impugned order dated 11.12.2015 is attached as annexure **J.**

7- That appellant feeling aggrieved from the impugned order dated 11.12.2015 filed Departmental appeal on 18.12.2015 before the respondent No.2 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure **K.**

GROUND:

- A- That the impugned order dated 11.12.2015 issued by the respondent No.3 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015.
- D- That no show cause notice has been served on the appellant by the respondent Department before issuing the impugned order dated 11.12.2015 against the appellant.
- E- That no regular inquiry has been conducted before issuing the impugned order dated 11.12.2015.
- F- That no chance of personnel hearing/personnel defense has been given to the appellant before issuing the impugned order dated 11.12.2015.
- G- That the impugned order dated 11.12.2015 has been issued by the respondents in violation of the principle of Locus Poenitentiae.
- H- That appellant has successfully completed his probationary period and has served the respondent Department for more than three years but inspite of that the respondent No.3 issued the impugned order dated 11.12.2015.
- I- That the respondent Department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 against the appellant.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 19.3.2016

APPELLANT



AAQIB ZAMAN

THROUGH:



**NOOR MOHAMMAD KHATTAK
ADVOCATE**

(0345-9383141)

B-6



No. 447 Ag, Dated Parachinar The 06/3/2006

OFFICE OF THE POLITICAL AGENT KURRAM AGENCY



Certified that Mr./Mrs AAQUB ZAMAN

Son/Daughter of Mr. H. SAYED AMIR SHAH Belongs

To a recognized Tribe of ZEMUSHT Section WATIZAI

Sub Section MASHI KHEL and his/her father is/was a permanent

Bonafide resident of village DAGAN Kurram Agency

He/She is an eligible candidate to avail himself/herself of the seats reserved for

Tribal Areas Kohat Division Kohat Backward Area Kurram Agency

Tehsildar
PNT/CK

Asstt Political Agent
Lower Kurram Sadr

01/3/06

Political Agent
Kurram

06.3.2006

Attested
Head Master
G.H.S Bagan



②-②

S.No.KBSG 36646

Board of Intermediate & Secondary Education KOHAT



DETAILED MARKS CERTIFICATE Secondary School Certificate Examination Session 200 4 (Annual/Supplementary) (SCIENCE GROUP)

Name Aaqib Zaman
Father's Name Sayed Amir Shah Roll No. 84324

SUBJECT	Marks Allotted				Marks Obtained					In Words
	9 th	10 th			In Figures					
		Theory	Practical	Total Marks	9 th		10 th			
				Theory	Practical	Theory	Practical	Total Marks		
1. English	75	75	-	150					77	
2. Urdu	75	75	-	150					103	
3. Islamic Education	75	-	-	75					46	
4. Pakistan Studies	-	75	-	75					38	
5. Mathematics	-	100	-	100					72	
6. Physics	-	75	25	100			41	2	43	
7. Chemistry	100	-	-	100			37	20	57	
8. Biology	100	-	-	100			40	20	60	
Total	425	400	25	850					513	B.M.I

VERIFIED

[Signature]

Controller of Examinations
Board of Intermediate & Secondary Education, Kohat

Note: (1) Errors/Omissions are excepted. (2) "Re" means to reappear in the subject(s). (3) Failed/Re all means to reappear in all the subjects.

Prepared by: [Signature] Checked by: [Signature]

Date 21/9/05

[Signature]
Attested

Controller of Examinations
Board of Intermediate & Secondary Education
KOHAT.

ATTESTED
Gazetted Officer
G.H.S. Bagan (K.A.)

8

S.No. KB 23704

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 1601

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT
(N.W.F.P. Pakistan)
INTERMEDIATE EXAMINATION
PRE-ENGINEERING GROUP
Session 2005 (Supply)

THIS IS TO CERTIFY THAT AAQIB ZAMAN

Son/Daughter of SAYED AMIR SHAH

and a student of KURRAM AGENCY

Registered No 33-BK/GSKA-2003 has passed the *Intermediate Examination* of the Board of Intermediate & Secondary Education, Kohat held in Nov, 2005 as a Private candidate. He/She obtained 527 marks out of 1100 and has been placed in D Grade Representing Fair

The Examination was taken as a whole / in parts.

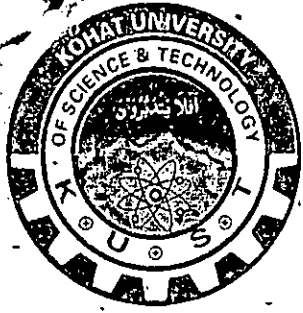
Asstt. Secretary
Asstt. Secretary

Secretary
Secretary

This certificate is issued without alteration or erasure.

ATTESTED

Attested
[Signature]
Gazetted Officer
G.P.S. Baghat (K)



Serial No. 019045

9

Kohat University

of Science & Technology, Kohat (Pakistan)

DETAILED MARKS CERTIFICATE

Bachelor of Science (B.Sc) Part II
Supplementary Examination, 2008

Name: Aaqib Zaman
Father's Name: Sayed Amir Shah

Roll No. 4871
Registration No. 2006-GDCSK-37

Certified that the candidate secured the following marks and is placed in 1st Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
Computer Science	75	39 ✓	Thirty Nine
Statistics	75	46 ✓	Forty Six
Maths A Course	75	55 ✓	Fifty Five
Pak Studies	40	19 ✓	Nineteen
<i>Part-I Marks</i>	285	201 ✓	Two Hundred One
Total	550	360 ✓	Three Hundred Sixty

The examination was taken in Parts

To Pass 40% Marks in each Subject (Written & Practical Separately) & 45% Marks in Aggregate.

Result declared on 02-May-09

Tahr

Errors and omissions are subject to subsequent rectification.

Verified & Found Correct.

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Controller of Examinations
Kohat University of Science & Technology
Kohat

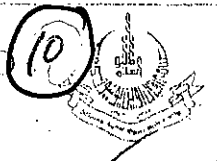
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Hamid Ullah Khan
Gazetted Officer
G.H.S. Bagan (K.A.)

ATTESTED

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CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 790381

PROVISIGNAL RESULT CARD

Name AAGIB ZAMAN
 Fathers's Name SAYED AMIR SHAH
 Address VILL & P/O BAGAN TEH ALIZAI

Roll No W873377
 Registration No. 07AKM0006
 Final Semester AUT- 2008

Tehsil KORRAM AGENCY
 District KORRAM AGENCY
 has successfully completed CERTIFICATE OF TEACHING

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 07	0632	EDUCATIONAL PSYCHOLOGY	100	61
SPR- 07	0631	DIMENSIONS IN EDUCATION	100	55
SPR- 07	0638	TEACHING STRATEGIES & EVALUATION	100	62
SPR- 07	0633	SCHOOL ORGANIZATION	100	64
AUT- 07	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	80
AUT- 07	0605	SOCIAL STUDIES & ITS TEACHING	100	73
AUT- 07	0604	URDU LANGUAGE AND ITS TEACHING	100	69
AUT- 07	0635	ISLAMIAH AND ITS TEACHING	100	72
AUT- 08	0634	ENGLISH AND ITS TEACHING	100	80

Department Of Examinations
 (Certificate Section)
VERIFIED
 Certificate/Degree/Diploma/Transcript
 bearing Sr. No. 790381 is
 Checked & Found Correct.
 Signatures: _____

Attested
Ullah

Hamid Ullah Khan
 General Officer
 G.H.S. Dagan (K.A.)

CREDITS: 5

Total Marks / Obtained 700 / 596

Result Declared on JULY 25, 2009

Percentage / Grade 85 / B

Date of issue AUGUST 05, 2009

H
Controller of Examinations

Disclaimer:

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

ATTESTED
[Signature]

Alama Iqbal Open University
Islamabad



Serial No. 208393

Certified that Mr. / Ms. AAQIB ZAMAN

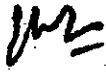
Son / Daughter of SAYED AMIR SHAH

Registration No: 07AKM0006 Roll No: AP650802

having successfully completed the prescribed requirements
in semester SPRING 2013 is awarded the degree of

Bachelor of Education (B.Ed)

He/She has secured 62 % marks and has been placed in B grade.

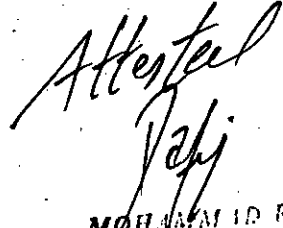

CONTROLLER OF EXAMINATIONS


VICE-CHANCELLOR

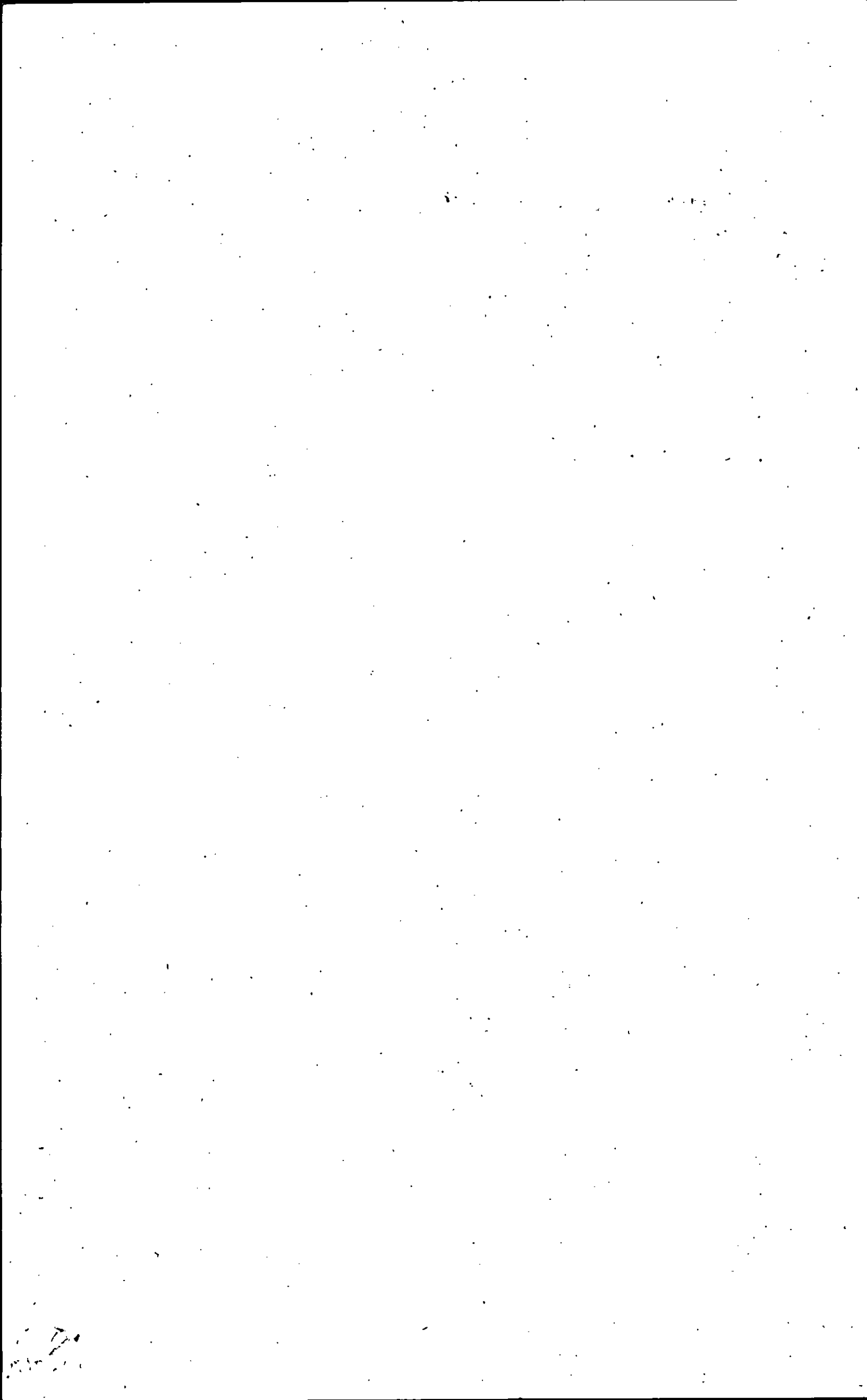
Result declared on: December 26, 2013

Date of Issue: October 29, 2014




MOHAMMID RIFIQ
B.P.S-17 G.H.S.

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



Serial No. 003224

Roll No. 21402

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 2005-003224-57

Kohat University of Science & Technology, Kohat (Pakistan)

(12)

Session ANNUAL, 2011

FAHIB ZAMAN SON of SAYED MIR SHAN and a student

of KURBAN AGENCY having passed the prescribed examination held in SEPTEMBER 2011, is this day admitted by

The Kohat University of Science & Technology, Kohat to the Degree of

Master of Arts

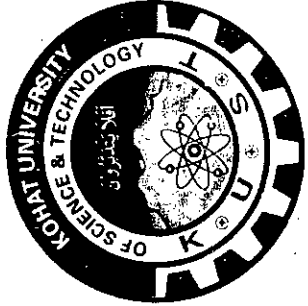
in the SECOND Division

The Subject of examination being

The Examination was taken as a whole / in parts

Ates Jami

J. M. SIDRATHI
B.P.S-17 G.H.S.
Bagon G. Kurram.



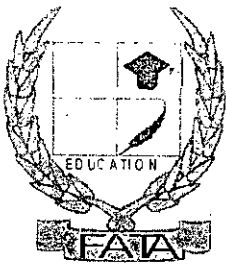
Controller of Examinations

Countersigned

Naib Chancellor
Vice Chancellor

FEBRUARY 18, 2013

Result declared on



**ADD: AGENCY EDUCATION
OFFICE SADDA KURRAM AGENCY.**

PHONE: 0926-520674 FAX 0926520674

No. _____ /Edu:

Dated Sadda: the _____ / _____ /2013

APPOINTMENT.

Consequent upon the approval by the Selection Committee, the appointment of the following CT teachers are hereby ordered in the school noted against their names against vacant CT posts purely on Regular contract basis in BPS No 9 Plus usual allowances as admissible under the rules with effect from 01.03.2013

S #	Name of Candidate	Father Name	School where Appointed	Remarks
1	Mujeeb Noor	Pio Noor	GMHS Sadda	Against Vacant Post
2	Muhammad Rehman	Mir Muhd Khan	GHS Shah Ibrahim	---do---
3	Muhammad Yousaf	Abdul Aziz	GHS Bilyamin	---do---
4	Javid Noor	Pio Noor	GHS Chappri	---do---
5	Muneeb Rehman	Haji Jernil	GMS Sra Ghurga	---do---
6 ✓	Aqib Zaman	Syed Amir Shah	GHS Bagan	---do---

TERMS/CONDITIONS.

1. They are directed to produce their Medical certificate from the Medical Supdt:AHQ Hospital Sadda Kurram Agency.
2. Their age should be between 18-35 years .
3. Their appointment is purely made on temporary and Regular contract basis, and liable to termination at any time without assigning any notice, in case they wants to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the Issuing Authorities concerned.
5. If they failed to take over charge within 15 days, their appointment will automatically be considered as cancelled.
6. Charge reports should be submitted to this office.
- 7: Their appointment will be consider as regular but without Pension/gratuity on the term of section-15 of the KPK Civil Servant Act 1973 as amended with civil servants amendment Act: 2003 but will be entitled to contribution Provident Fund at such rate as may be prescribed by the govt.

Add: Agency Education Officer
Lower & Central Kurram Sadda.

No 221-33 / Edu Dated 18/11 /2013

Copy forwarded to the.

1. Director of Education FATA KPK Peshawar.
2. Agency Account officer Parachinar.
3. Political Agent Kurram Parachinar.
4. Asstt:Political Agent Central Kurram .
5. Teachers Concerned.
6. Headmaster concerned..
6. Office file.

ATTESTED

Appointment
Letter

Add: Agency Education Officer
Lower & Central Kurram Sadda

②-14

G H S BAGAN
CHARGE REPORT

I Mr. Aaqib Zaman S/O Sayed Amir Shah have taken the charge
Of C.T Post at B.P.S 09 at G.H.S Bagan Lower Kurram Agency
With effect from 19/01/2013 fore noon vide Addl: Agency
Education Officer Lower & Central Kurram Sadda Kurram Agency.
Endst: No 221-33/Edu Dated: 18/01/2013

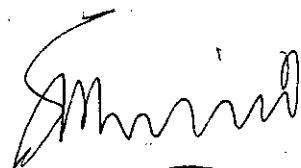
Signature of Receiving

Aaqib Zaman



Signature of Relieving

Head Master
GHS Bagan (L.K.A)



ATTESTED



18/01/2013

OFFICE OF THE SMO INCHARGE THQ HOSPITAL SADDA KURRAM AGENCY.
HEALTH AND AGE CERTIFICATE

Name of Official, MR. AQIB ZAMAN

(E-151)

Father Name, SYED AMIR SHAH

Date of Birth, 10/02 /1986

Residence, VILLAGE BAGGAN P/O BAGGAN LOWER KURRAM AGENCY

Cast of Race, WATIZAI

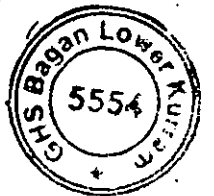
Exact Height by measurement, 5 FEET 7 INCH

Personal mark of identification, NIL

Signature of Official, _____

Signature of head of the Office, _____

Seal of Office



It is certified that I examined, MR. AQIB ZAMAN S/O SYED AMIR SHAH

Candidate for employment in the Office of the EDUCATION DEPARTMENT KURRAM

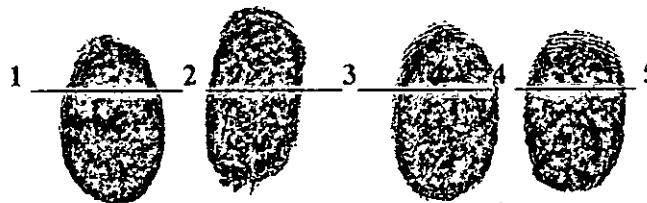
and cannot discover that he has any communicable Diseases OR

other mentally & physically abnormality OR bodily infirmity except nil. I do

not consider this as disqualification for employment in the office of the

EDUCATION DEPARTMENT KURRAM. His age is according to his CNIC and School Leaving Certificate is (27 years) and by appearance about (27Years).

LEFT HAND THUMB AND SIGNATURE IMPRESSION.



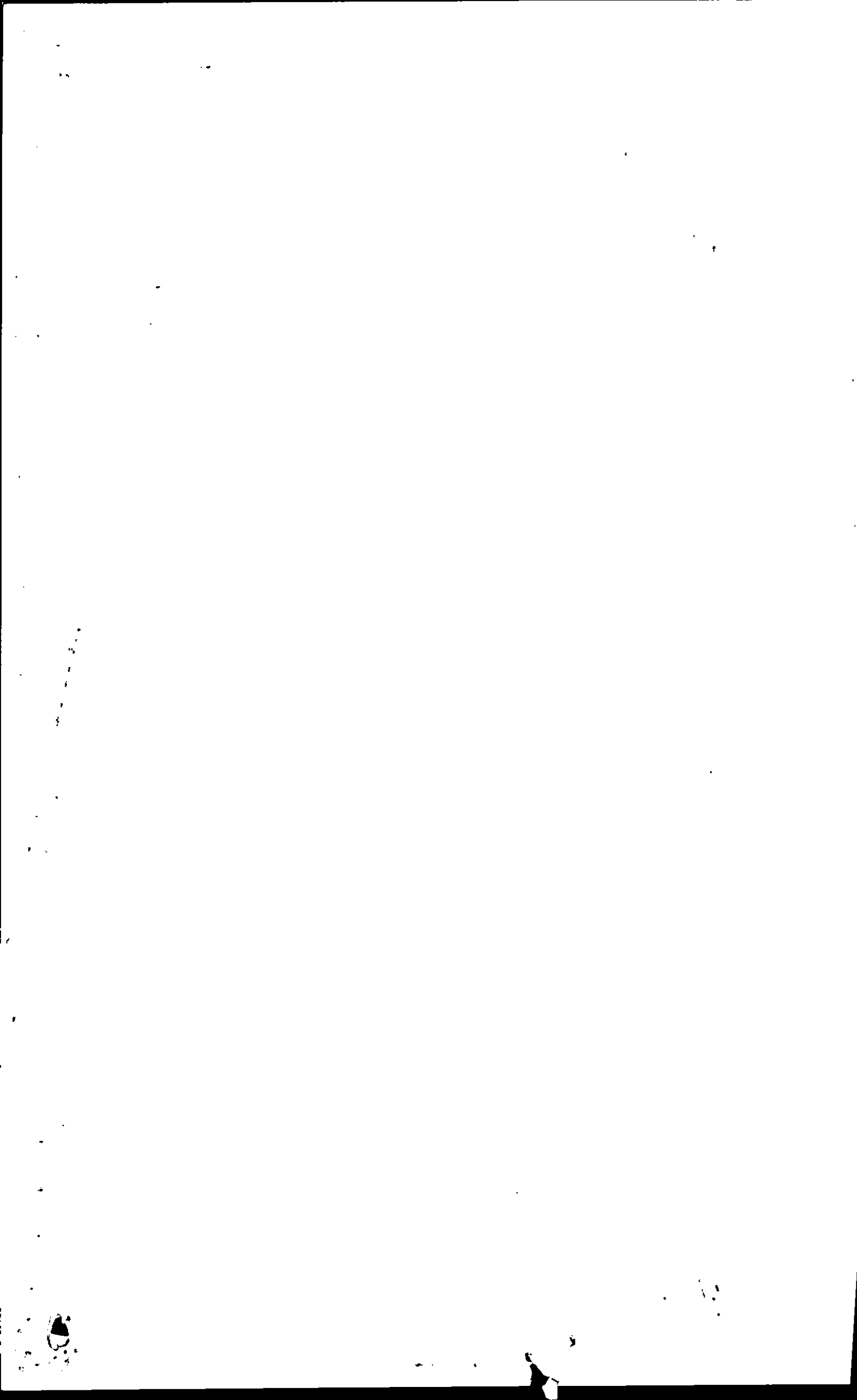
Ahmed Amin
SMO Incharge THQ
Hospital SADDA
Dated, 6-2-2013

INCHARGE
T.H.Q. Hospital
Sadda Kurram Agency
Ahmed Amin
Countersigned.
Medical Superintendent,
Agency Head Quarter Hospital
Parachinar
Agency Head Quarter Hospital
Parachinar

ATTESTED

[Handwritten signature]

[Handwritten signature]



(For use in Police Department only)

Heirs:

① Passed SSC(A) Exam 2004 from BISE Kohat, Under
1. Roll NO: 84324 and Secure 513/850 Marks.

2.

3.

② Passed Fsc (Sup) Exam 2005 from BISE Kohat

Verification Roll No.

dated

received back

Under Roll NO: 1601 and Secure 527/1100 Marks.

Left Thumb Impression

③ Passed BSc (E) Exam 2008 from KUST Kohat
Under Roll NO: 4871 and obtain 360/550 marks.

Qualification	Date	Qualification	Date
English	Passed M.A (History) 2011 from KUST Kohat Under Roll NO: 21402 and Secure 559/1100 Marks.	First Arts	
Pushto		B.L. Or B.A.	
Urdu	Passed C.T Exam 2009 from AIQU Islamabad, under Roll NO: W693807 and Secure 596/900 Marks.	Pleadership examination Training School Final examination	
Plan-drawing			
Finger Print		Other qualification:—	
Drill Instructing			
Court Duties			
Reserve Duties			

N.B.— Line to be drawn under the qualification possessed.

Note:- The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name: Aaqib Zaman

2. Race: Watizai

3. Residence: Village, P.O Bagan Tehsil Lower Kurram Agency

4. Father's name and residence: Sayed Amir Shah As above

5. Date of birth by Christian era as nearly as can be ascertained: 10-02-1986

6. Exact height by measurement: 5-7

7. Personal marks for identification: NIL

8. Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

ATTESTED

9. Signature of Government Servant: [Signature]

10. Signature and designation of the Head of the Office, or other Attesting Officer: [Signature]
Head Master:
G.H.S Bagan

[Signature]

ATTESTED

Head Master
GHS Bagan
02-03-016

[Signature]
Headmaster
GHS, Bagan
/ L.K. Agency

Certified that Mr. Nagib Raman & Said Amri
Brah has been worked as CT at GHS,
Bagan Lower Kuram Agency since 01-03-2013
to 08-09-2014 & was satisfied with
his duty.

Duty certificate

6
01-20

H-21

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 3602 /2014

Farooq Muhammad and others.....Petitioners

VERSUS

Additional Chief Secretary, FATA & others.....Respondents

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Through

Petitioner

Adnan Khattak
Adnan Khattak

Advocate, Peshawar

Cell: 0300-5930703

Date: 11.11.2014


ATTESTED

[Signature]

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2014

- ✓ 1. Farooq Muhammad S/o Arab Gul
- ✓ 2. Muhammad Saeed S/o Zarbat Khan
- 3. Ajab Khan S/o Gul Muhammad
- ✓ 4. Latif Hussain S/o Inam Hussain
- 5. Muhammad Ayaz S/o Gul Karim
- 6. Aziz ur Rehman S/o Said Rehman
- 7. Taj Ahmad S/o Lal Muhammad
- 8. Feroz Khan S/o Gul Zaman khan
- 9. Said Hassan S/o Muhammad Hassan
- 10. Hussain Ahmad S/o Muhammad Rafiq
- ✓ 11. Wahid Zaman S/o Zawta Khan
- 12. Mst. Muzlifa D/o Muhammad Farooq
- 13. Muhammad Yousaf S/o Abdul Aziz
- ✓ 14. Aqib Zaman S/o Syed Amir Shah (All CT Teachers,
Lower & Central Kurram Agency)
- 15. Khiyal Bat Khan S/o Hibat Khan
- 16. Kifayatullah S/o Mir Jehan
- ✓ 17. Zar Taj Bibi D/o Haji Ajmir Khan (All PET Teachers,
Lower & Central Kurram Agency)
- 18. Noor Zaman S/o Noor Jamal
- ✓ 19. Mst. Shamim Bibi D/o Spin Gul

ATTESTED


- ✓ 20. Parveen Bibi D/o Spin Gul (All DM Teachers, Lower & Central Kurram Agency)
 - ✓ 21. Siraj ud Din S/o Walayat Khan
 - 22. Zubair Khan S/o Ghafoor Khan (Both Junior Clerks/ JC, Lower & Central Kurram Agency)
 - 23. Rehmatullah S/o Muhammad Rahim (Pesh Imam, Lower & Central Kurram Agency)
 - 24. Rashid Khan S/o Khadi Khan (Lab Assistant)
-PETITIONERS

VERSUS

- 1. Additional Chief Secretary, FATA
FATA Secretariat, Warsak Road, Peshawar
 - 2. Secretary Finance,
Govt of KPK, Civil Secretariat, Peshawar
 - 3. Additional Agency Education Officer,
Lower & Central Kurram, Sadda
 - 4. Agency Account officer, Parachinar
 - 5. Director of Education, FATA KPK, Peshawar
-RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973**

Respectfully Sheweth:

- 1. That the respondent No.3 (Additional Agency Education Officer, Lower & Central, Kurram Sadda)

ATTESTED




floated advertisement in daily newspapers about the posts of PET, CT, Lab Assistant etc and petitioners, being eligible and qualified, applied for the same for selection on merit as such. (Copy of advertisement is attached as Annexure "A").

2. That the petitioners were interviewed and after going through the prescribed procedure of selection, they were, on the recommendation of Departmental Selection Committee appointed as such vide orders/ letters dated 15.01.2013, 18.01.2013 and 21.01.2013 respectively. (Copy of order/ appointment letters are attached as Annexures "B").

3. That petitioners were performing their duties with full devotion, after carrying-out their medical examination and taking charge on their respective posts, performing their duties till date. (Copies of medical certificates are attached as Annexure "C", charge reports are Annexure "D" and attendance sheets are Annexure "E").

4. That petitioners contacted respondents for payments of their monthly salaries but were told time and again that the department is going to prepare bills for the purpose. Every month took such practice but no fruitful result was ever achieved.

ATTESTED


5. That petitioners were constrained to prefer their departmental appeals before the authorities but in vain. (Copies of appeals are attached as Annexure "F"). Hence, the petitioners being aggrieved, approached this Honourable Court, inter alia, on the following grounds

G R O U N D S:

- A. That from the date of appointments, petitioners are performing their duties on the respective posts till date.
- B. That respondents were contacted from time to time for payments of their monthly salaries but every time they were deceived with commitment to be paid the same in the next month.
- C. That when petitioners came to know that the department is not fulfilling its commitment for the purpose, they agitated the matter through representations, but without any response.
- D. That two junior clerks namely Sakhi Akbar S/o Siddique Akbar and Abidullah S/o Muhammad Ghulam were also appointed vide dated 18.01.2013 according to the same advertisement dated 25.10.2012, are receiving salaries from the respondent No.3 which is clear cut violation of Article 25 of the Constitution of Pakistan, 1973.

ATTESTED



E. That the act of the respondents by not paying the monthly salaries to the petitioners since the date of appointments, they are not only violating natural justice but also the cardinal principles of Islam.

F. That the petitioners are performing their respective duties honestly and the attendance sheets are duly attested by the Headmaster. (Copies are attached).

In view of the above, it is therefore, humbly prayed that on acceptance of this petition, this Honourable Court may graciously be pleased to:

- i. Direct the respondents to forthwith pay monthly salaries to the petitioners.
- ii. Any other relief available in the circumstances of the case, not specifically asked for, may also be granted to the petitioner.

Through *Adnan Khattak*
 Petitioner
Adnan Khattak
 Advocate, Peshawar

Date: __.11.2014

CERTIFICATE:

Certified on instructions of my client that petitioners have not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.

Adnan Khattak
ADVOCATE

LIST OF BOOKS:

- 1. Constitution of Islamic Republic of Pakistan, 1973
- 2. Any other law books according to need




Adnan Khattak
ADVOCATE

ATTESTED

[Signature]

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

S.No.	Date of order	Order or other proceedings with signature of the Judge
1	2	3
	1.12.2015.	<p><u>W.P.No.3602/2014.</u></p> <p>Present: Mr.Adnan Khattak, Advocate for the petitioners.</p> <p>Syed Qaiser Ali Shah, AAG for Provincial Government. — </p> <p>Comments have not been filed. The latter seeks time to do the needful. May do so. Adjourned to a date in office.</p> <p style="text-align: right;">  JUDGE </p> <p style="text-align: right;">  JUDGE </p> <p style="text-align: center;">ATTESTED</p> <p style="text-align: center;"></p> <p><u>*M.Gul*</u></p>

TERMINATION ORDER.

Consequent upon the direction by the competent authority, Director of Education FATA Peshawar vide his No 12228 dated 07.12.2015, on the decision of oversight committee the following in-eligible teaching/Non teaching appointees (M/F) BPS (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S #	Name	Father Name	Designation	B.P.S	Name of Institution	Remarks
1	Aqib Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota.
2	Muhammad Asif	Syal Khan	CT	9	GHS Makhizai	Terminated due to excess in sub divisional quota & advance appointment against on fill post.
3	Sara Bibi	Sakhi Mar Jan	DM	9	GGMS Bagan	DM diploma found fake & bogus.
4	Shahid Mehmood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of JDPE found fake & bogus.
5	Muhammad Usman	Haji Shah Wazir	PET	9	GMS Arawali	Having no professional qualification.
6	Muhammad Alam Khan	Salam Khan	I/C	7	GHS Makhizai	Failed in typing test & rejected by enquiry officers.
7	Zubair Khan	Ghafoor Khan	I/C	7	GGDC Bagan	Rejected by PA enquiry.
8	Muhammad Sadiq	Gul Mar Jan	I/C	7	GGDC Alizai	Failed in typing test as per advertisement & rejected by enquiry officers.
9	Sakhi Akbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officers.
10	Sadia Batool	Abid Alam Jan	Lab/A-sstt	7	GGDC Alizai	Documents not provided for verification.
11	Muhammad Saeed	Zar Bat Khan	CT	9	GHS Baza	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GHS Ossai	Terminated due to excess in sub divisional quota.
13	Latif Hussain	Inam Hussain	CT	9	GHS Angori	Domicile holder of upper kurram.
14	Wahid Zaman	Zawta Khan	CT	9	GHS Dogar	Terminated due to excess in sub divisional quota.
15	Farooq Muhammad	Arab Gul	CT	9	GMS Taudy Oby	Out of merit (M.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar Khan	CT	9	GGMS Dogar No -2	Terminated due to excess in sub divisional quota.

ATTESTED

28
29

20	Sakina	Spin Gul	DM	9	GGMS Tabi Khonikhel	Terminated due to excess in sub divisional quota
	Samreen	Spin Gul	DM	9	GGMS Tabi Khonikhel	Documents not provided for verification
	Shahin Bibi	Spin Gul	DM	9	GGMS Tabi Khonikhel NO-2	Having no DM certificate & has not provide BA degree for verification
	Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM certificate & has not provide BA degree for verification
21	Bibi Jamila	Niaz Bahadar Khan	DM	9	GGMS Tabi khonikhel	Having no DM certificate/diploma
22	Sajid Rehman	Haji Haider Khan	PET	9	GMS Dappa	IDPE diploma found false & bogus.
23	Zia ul Alam	Noor Alam	PET	9	GMS Khazecna	IDPE diploma found false & bogus.
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamal	IDPE diploma found false & bogus.
25	Kifayatullah	Mir Jehan	PET	9	GMS Kunal Baza	Having no professional documents.
26	Zar Taj Bibi	Haji Amir Khan	PET	9	GGMS Ossai	Having no professional documents & Lower Kurram domicile holder while she was appointed in Central Kurram, also appeared as CT (LK) while appointed as PET (CK).
27	Sajid Rehman	Sud Aslam Khan	I/C	7	GHS Paloseen	Has been excluded by PA enquiry.
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatou	Failed in typing test as per advertisement & rejected by enquiry officers.

Add: Agency Education Officer
Lower & Central Kurram Sadda.

No 2987-93 /Edu: Dated 11 / 12 / 2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for similar action.

Add: Agency Education Officer
Lower & Central Kurram Sadda.

ATTESTED

Before the Director of Education FATA
FATA Secretariat, Warsak Road,
Peshawar.

J ~~12~~ - 3

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER OF
ADDITIONAL EDUCATION OFFICE, KURRAM
AGENCY WHEREBY THE SERVICES OF THE
APPELLANT HAVE BEEN TERMINATED ON
11.12.2015.

Sir,

That the appellant states as under:

- 1) That according to the advertisement dated 25.10.2012 the appellant applied for the C.T post
- 2) That the appellant having the requisite qualification B.sc, M.A, Bed and CT
- 3) That the interview was held on 10.12.2012.
- 4) That the appellant was selected and appointed as a C.T teacher on GHS Bagan^(L.R) dated 18.01.2013. by letter no- 221-33.
- 5) That the appellant performed their duties according to the entire satisfaction of their superiors.
- 6) That after a long time of three years an enquiry was conducted in the case of the appellant and the appellant was terminated on 11.12.2015 without any fault of the appellant.
- 7) That aggrieved with the order, the appellant has come before your honour on the following grounds:

GROUND:

- A. That all the acts and actions of the department is against law, facts, hence liable to be set aside.

ATTESTED



- B. That the department has ignored the fact that the appellant has the requisite qualifications.
- C. That the department has ignored the fact that the appellant has performed the duties for more than three years.
- D. That the department has not followed the law of the superior courts.
- E. That the selection was made according to law and rules by the department.

Therefore, it is requested that on acceptance of this appeal, the appellant may be reinstated in service with all back benefits.

Dated: 18.12.2015


Appellant

Aaqib Zaman

s/o Sayed amir shah
Lower Kurram Agency.

ATTESTED



BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: 300/16

Mr. Aqil Zaman Br - E.T (BPS-15)
GHS Bagan Kurram Agency.

.....Appellant.

VERSUS

1. Additional Chief Secretary FATA Secretariat Warsak Road Peshawar.
2. Director Education FATA Secretariat Peshawar.
3. Additional Agency Education Officer Lower & Central Kurram Agency
4. The Agency Account Officer Kurram Agency..... Respondents.

Para-wise comments on behalf of respondent No: 2 & 3

Respectfully Sheweth:

Preliminary Objections

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law.

On Facts:

1. Correct to the extent that advertisement was stated for different categories of post by Agency Education Officer, but the candidates applied were not eligible, as on various complaints inquiry was conducted and anomalies were found in the recruitment process.
2. Correct to the extent that appointment orders were issued to the petitioners and other candidates, but the respondents Department legally intervened and constituted search committee to trace out bogus degree holders, therefore, the committee submitted its report clearly picked out those candidates who had applied through fake/bogus degrees, report of search committee attached as (Annexure-A).
3. No comments. Subject to record.
4. The respondent department in order to investigate/inquire the anomalies carried out in recruitment process in Kurram Agency held inquiries and constituted search Committee. It is pertinent to mention here that the responsible Officer was charge Sheeted and proposed to the Government for necessary action under E&D rules. However the salaries of those candidates whose degree's/certificates were verified by the over-sight committee were ordered to be initiate against all those involved in fakism and forgery, copy of letter annexed as (Annexure-B) also a letter No. 12229-36 dated 07/12/2015 was addressed to Additional Agency Education Officer, Lower and Central Kurram Agency for the release of salaries of eligible candidates and terminate in-eligible candidates, copy of letter attached as (Annexure-C).
5. No comments. As explained in Para No.4 above.
6. No comments. As explained in Para No.4 above.
7. No comments. Pertains to record.

Grounds:

- A. Incorrect. Respondent has not taken any action which is against Law & facts.
- B. Incorrect. Respondents have acted according to law/policy as the appellant was wrongly appointed, therefore their appointment was liable to struck down under the law.
- C. As explained in Para-B above.
- D. No comments. As stated above in Para-B.
- E. Incorrect. As explained in Para D above.


- F. No comments. Hence denied.
- G. No comments. Pertains to record.
- H. No comments. Pertains to record.
- I. No comments. As stated above.
- J. Respondents also seeks permission to advance other grounds at the time of arguments.

In light of the above facts it is humbly requested to please dismiss the appeal having no legal grounds with cost.

Respondent NO. 2


Director Education FATA

Respondent NO. 3


Addl: Agency Education Officer
Kurram at Parachinar


AFFIDAVIT

We the above respondents do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.

Respondent NO. 2


Director Education FATA

Respondent NO. 3


Addl: Agency Education Officer
Kurram at Parachinar

TERMINATION ORDER.

Consequent upon the direction by competent authority, Director of Education, FATA Peshawar vide his no. 12228 dated 07-12-2015 on the decision of overnight committer the following in-eligible teaching/non teaching appointees (m/F) BPA (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S#	Name	F/ Name	Desg:	B P S	Name of institution	Remarks
1	Aqlb Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota
2	Muhammad Asif	Syal khan	CT	9	GHS Makhuzu	in sub divisional quota & advanced appointment against on fill post
3	Sara bibi	Sakhi mar jan	DM	9	GGMS Bagan	DM diploma found fake & bogus
4	Shahid Mehmood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of JDPE found fake & bogus.
5	Muhammad usman	Haji Shah wazir	Pet	9	GMS Arawali	Having no professional qualification
6	Muhammad Alam Khan	Salam khan	I/C	7	GHS Markuzai	Failed in typing test & rejected by enquiry officer.
7	Zubair Khan	Ghafoor Khan	I/C	7	GDC Bagan	Rejected by PA enquiry
8	Muhammad Sadiq	Gul Mar jan	I/C	7	GGDC Ahzair	Failed in typing test as per advertisement & rejected by enquiry officer.
9	Sakhi Akhbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officer.
10	Sadia Batool	Abid Alam Jan	Lab/A	7	GGDC	Documents not provided
11	Muhammad Saeed	Zar bat khan	CT	9	GHS	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota
13	Latif Hussain	Imam Hussain	CT	9	GHS Augori	Domicile holder of upper Kurram
14	Wahid Zaman	Zawta khan	CT	9	GH Dogar	Terminated due to excess in sub divisional quota
15	Farroq Muhammad	Arab Gul	CT	9	GMS Taudy oby	Out of merit (m.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar khan	CT	9	GGMS Dogas No-2	Terminated due to excess in sub divisional quota

17	Bibi Sakina	Haji Gul Akbar	CT	9	GGMS tabi Khonikhel	Terminated due to excess in sub divisional quota
18	Samreen Sadaf	Haji Amin Khan	DM	9	GGMS Tarali	Documents not provided for verification
19	Shamin Bibi	Spin Gul	DM	9	GGMS Dogar No2	Having no DM Certificate & has not provide BA degree for verification
20	Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM Certification & has not provide BA Degree for verification
21	Bibi Jamila	Khan	DM	9	GGMS tabi khonikhel	Having no DM certificate / Diploma
22	Sajid Rahman	Haji Haider Khan	PET	9	GMS DApa	JDPE diploma found fake & bogus
23	Zia ul Alam	Noor Alam	Pet	9	GMS Khazcena	JDPE diploma found fake & bogus
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai	JDPE diploma found fake & bogus
25	Mr. Jehan	PET	9	GMS Kunal Baza	Having no professional documents
26	Zar Taj Bibi	Haji Anmir Khan	Pet	9	GGMS Ossai	Having no professional documents & lower Kurram domicile holder while she was appointed in Central Kurram also appointed ...
27	Sajid Rehman	Said Adam Khan	I/C	7	GHS	Has been expelled by pa enquiry
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatooo	Failed in typing test as per advertisement & rejected by enquiry officers.

Add. Agency Education Officer
Lower & Central Kurram Sadda.

No 2987-93 /Edu dated 11-12-2015

Copy for information to the: -

1. Director of education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency
4. Agency Account Officer Kurram Agency.
5. Assistant political agent Lower Kurram
6. Assistant Political Agent Central Kurram.
7. Principals/ Headmasters concerned for similar action

Add: Agency Education Officer.
Lower & Central Kurram Sadda



9

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210115 FAX 091-9210216

NO.

DATED ... / ... / 2015 E-7-6 MEETING FILE NO

Most Urgent.

14

To: The Additional Agency Education Officer
Lower & Central Kurram Agency

Subject: RELEASING OF PAY /SALARIES OF FRESH APPOINTEES,
APPOINTED DURING 2012-13.

Memo: Please refer to this Directorate Memo.No.1446 dated
13/12/2014, addressed to Agency Accounts Officer Kurram Agency.

Consequent upon the recommendations of oversight
committee, constituted by the competent authority, I am directed to inform
you to release the salaries of eligible candidates appointed during 2012-13
by your office as per enclosed lists attached duly signed by the over sight
committee members and terminate in-eligible candidates as per lists
attached with effect from the date of their appointments and if salaries paid to
them be recovered from them accordingly.

^{Sel}
Deputy Directress (Estab)

Endst.No 12229-36

Dated 7/12 2015

Copy to;

1. Political Agent Kurram Agency with the request to take action against the candidates as per enclosed lists appointed on fake documents as per rules.
2. Agency Education Officer Kurram Agency.
3. Deputy Director (F/A) local Directorate.
4. Deputy Secretary Law & Order FATA Secretariat.
- ✓ 5. Assistant Director (Litigation) local Directorate.
6. PS to secretary AI&C FATA Secretariat.
7. PS to Secretary SSD FATA.
8. P.A to Director Education, FATA.

Deputy Directress (Estab)

9



To
The Political Agent
Kurram Agency

"E"

Subject: APPOINTMENT MADE BY MR.MOEEN GUL AAEO; AEO
LK/CK.

Memo:

I am directed to refer to your letter No.5733 dated 30-4-2015 on the subject noted above and to state that on the recommendation of oversight Committee, the competent authority is pleased to dispose of instant case as under.

1. Being Appellate authority, the Political Agent concerned may dispose with the services of the ineligible candidate's initiate criminal cases against these appointees on fake documents and recover the salaries from them (list attached).
2. The eligible candidates may be retained and their salaries be released (list attached).

You are therefore requested that action may be taken at your end under intimation to all concerned.

o/c Director Education, FATA

Endst.No. 10119-25
Copy to;

Dated 30/9 2015

1. Agency Education Officer Kurram Agency at Parachinar.
2. Deputy Secretary Law & Order FATA Secretariat.
3. Deputy Director (F&A) local Directorate.
4. PS to Secretary F&A FATA Secretariat.
5. Additional Agency Education Officer Lower/Central Kurram.
6. PS to Secretary SSD FATA.
7. PA to Director Education, FATA.

o/c Deputy Directress (Estab)