BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR. (CAMP COURT ABBOTTABAD)

APPEAL No 1484 OF 2019

Mst. F	arzana	Wali	
	** 1 7 ** * * * * * * * * * * * * * * *	* * 46	

Appellant

VERSUS

- 1. Director Elementary & Secondary Education Peshawar
- 2. District Education Officer (Female) Kohistan Upper

Respondents

PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1, 2.

INDEX

S#	Particulars of documents	Annexure	Pages
l	Comments along with affidavit		1-5
2	Copy of IMU report, SDEO report, show cause notices, Absentee notice and newspaper cutting etc	"A"	6-13
3	Copy of rejection of appeal by the appellate authority	"B"	14
4	Copy of Removal order	"C"	15-16

Dated 06-11-2023

291-11-23 A-Abaci

District Education Officer, (Female) Kohistan Upper

13403-0157115-1
Abdul Has
I/c DED (F) Kohistan upper

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR. (CAMP COURT ABBOTTABAD)

A	P	PE	AL	No	1484	OF	201	9
---	---	----	----	----	------	----	-----	---

Mst.	Farzana	Wali	

	# 2 ·	Phorastial !
	15. F4 740	8986
Appellant		4-11-2

VERSUS

- 1. Director Elementary & Secondary Education Peshawar
- 2. District Education Officer (Female) Kohistan Upper

Respondents

PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1, 2.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:-

- 1. That the appellant did not come to this Honorable Tribunal with clean hands.
- II. That the appellant has got no cause of action /locus standi to file the Instant appeal
- III. That the appellant is estopped to sue through his own conduct.
- IV. That the present appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
- V. That the appellant has concealed the material facts from this Honorable

 Tribunal, hence appeal is liable to be dismissed without any further proceeding.
- VI. That the appellant has already been removed from Service afterCompletion of all codal formalities vide order dated 20/04/2019, henceAppeal is liable to be dismissed.
- VII. That the appeal is time bared hence not maintainable and liable to be Dismissed.

Factual Objections:

- 1. Para No. 1 is pertaining to the appellant personal record hence, needs no comment.
- 2. Para No.2 is Incorrect strongly denied that the appellant reported absent from duty by IMU as well as SDEO reported her absent from duty, showcause notice was served to the appellant on their home address no reply received then the respondent issued final showcause notice to the appellant on receiving no reply, the appellant did not performed her duty in school and proved unauthorized absent from her duty and at the end the same absent notice has been published in the leading newspaper but still the appellant did not join her duty at their school. The appellant was removed from service by following all the codal formalities.

(Copy of IMU report, SDEO report, showcause notice, absent notice And news paper Cutting is annexed as annexure-"A").

3. Para No.3 is incorrect strongly denied that the appellant appeal was rejected by the competent authority due to fulfillment of all codal formalities in her removal order.

(Copy rejection of appeal is annexed as annexure-"B").

4. Para No.4 is Incorrect strongly denied that the appellant was not aggrieved one, the appellant was removed from service by fulfillment of all codal formalities as per rule vide Endstt: No. 1198-1210 dated 20-04-2019.

(Copy of removal order annexed as annexure-"C")

GROUNDS

- A-Incorrect, strongly denied that the appellant removed from service after fulfilling of all codal formalities as stated in Para 2 of factual objections.
- B- Incorrect strongly denied that the appellant was removed by following all codal formalities, issued her absence notice in the newspapers in which the allegation have been proved upon him as stated in Para 2 above of factual objections
- C-Incorrect strongly denied that the showcause notice was issued to the appellant as well as issued her absence notice in the newspapers in which the allegation have been proved upon him as stated in Para 2 above of factual objections.

- D- Incorrect strongly denied that the appellant absence was proved and after that removed her by following all the codal formalities.
- E- Incorrect strongly denied the showcause notices was served to her, as well as issued her absence notice was issued in the newspaper after following all codal formalities the appellant has been removed from service as stated above Para No.2 of factual objections..
- F- Incorrect strongly denied that as stated in Para 2 above of factual objections.
- G-Incorrect strongly denied that the appellant was willfully absented himself from his School duty as stated in the above factual objection and showcause notice was served to him, a chance of personal hearing was also given to the appellant and also issued their absent notice to the newspaper by following all the codal formalities the appellant has been removed.
- H- Incorrect strongly denied as stated Para 2 of the above factual objections.
- I- Incorrect strongly denied that the appellant was absented herself from duty as stated Para 2 above of factual objection.
- J- Incorrect strongly denied that the removal order was passed by following all the codal formalities as stated Para No.2 of the above factual objection. The appellant appeal is time barred.

It is therefore, in the light of above stated facts and circumstances. Very humbly prayed that, appeal in hand may please be dismissed with cost.

Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

Dr. Muhammed Isba

District Education Officer, (Female) Kohistan Upper

About Hos I/e DEO(I) Kohefan uppe

Mst. Farzana Wali	 Appellan
MIST. LALZAHA MAH	 Appenan

VERSUS

- 1. Director Elementary & Secondary Education Peshawar
- 2. District Education Officer (Female) Kohistan Upper

Respondents

PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1, 2.

AFFIDAVIT

I, Mr. Abdul Haq DEO (F) Kohistan Upper, is hereby solemnly affirm and declare that the contents of foregoing comments of the appeal No. 1484/2019 titled Mst. Farzana Wali versus Govt: of KPK are true and correct to the best of my knowledge and belief and nothing is being suppressed from the Honorable Tribunal.

It is further back on oath that is this appeal would the Answers respondent have nother been placed DEPONE In Party nor their defence has been struct off 13403-01

13403-0157115-1 Abdul Has StyleDEO Es Kohufan upper

M vs First Appointed Father Name Designation num 12s BP\$ Disability Outs Of Apt animent **Highest Qualification Level** Matric Subject Status Details Status CNIC Date(dd/mm/YYYY) personalNo School 3004 1 23 1 iksost varifi). 3<u>6</u>-4 <u>GEOGRAPAGE</u>#TOKEN/O (0)(0)(0)(0)(0)(0) · RECURSESSION 1177578780 FYZ#Z 16 15 =1_4(4)020'0 4 REPORTED IN THEORY SEATING 0.0<u>022</u>6.5 J-164 0.4141 (i)<u>stre£</u>5: ijang panggija . 15. -a. (ECERCIAL MINE) ų (<u>3: 34</u>.) RED MENERAL SERVICE 31 74 45-18 ·张达的精神统治保险 estal terrority 0.14559225 n T<u>iğişiye</u> e (Richard Participal) <u>ĮČIOS ZODŽIIČONĖ</u> AILO 0.00<u>00000</u> GRANDA PARABATA (FERRORE STATE . (1)((14 g q)(4)=(. (i,0432333) TOTAL CONTROL MANAGEMENT BUTTER PROJECTION इंग्रिस्ट्रेंश्चेष्क् बाटा page 1965 page 1965 bits ্ৰ ক্লান্ত আন্ত্ৰাল্ড **স্থা**ট geterate (Acceptantal) (10<u>4719474</u>5 AND ZOTED PERSON KE COMPAGE TO th sameone কিলাডা**স্টে**ল্ডা व्याप्तायक्या वास्त्रेक्ट ien@gegge şkı (**∰∥40**(4)∓ı ZZOTO OTKE SE (F)(\$100000) ng riperio Eglen gefriffenen. क्षेत्रकार**ा**कारा का MERIEE I tkirostyz<u>io</u>st e?e! • f-300\$ n u otorai EEEEEOTO TO TO n.(\$3888a) 486<u>3847</u>80*25*3 ege: ল <u>হেন্</u>নেল (MANAGEMOTERS) (RESIDENCE STREET 1<u> = --</u>2 THE PROPERTY OF १k५३१ **१**१५३५:**१**३ erers. UNGCHROOMS m<u>ga tanta</u> चेन्द्रविक्ष<u>ास्ट</u>्रिकी dfgrjaggalegeran **建设设计图页2000**。 organia Organia iky ospacije: ATTRACTORS IN \$1200 HERRETON ... ZEEZ-TETION eren deposit Zate Participation of gren - strasgester TELEVATE 🖊 90<u>000</u> iks sakkisəl le -4 TENZIA

fefeiren gliffetgungen.

de constant

OFFIVEE OF THE SUB DIVISIONAL EDUCATION OFFICER (Female) DASSU

505_SDEO(F) DASSU Dated_23 / 01 12019.

To,

The District Education Officer, (Female) Kohistan.

SUBJECT; - RE-SUBMITT OF ABSENT TEACHERS REPORT. Merno:-

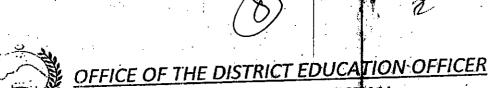
Reference your office dairy NO 1789 dated 8/1/2019 subjects cited above.

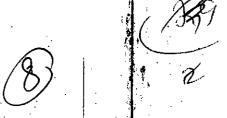
The absent report, recommendation of action taken is re-submitted for

# Name of school	Name of			d for further proceeding pleas
	Name of school	Absent		sion taken
		Period		non tuken
1-Luzhaba PST	GGPS Pashot			
12-sadaf Zaib PST	OGP'S Pashot	1/1/2018	Thele	achers are of the
₹1-Raqiba saif PST	GGPS Sergari	up till now	procee	eachers are still absent from du ed if agreed please
2-Asma saif PST	Journ & Sergan	5/3/2018	Both th	he teachers absent from duty ,
Farzana Wali PST	GGPS Jakh	up till now		'Y II QUI ERA .
Shot		10/6/2018	The tea	acher still absent for
Shaheen Zameer PS1	GGPS Lohi Dadair	1/2/2015		
Gul Bibi PST	- Ladan	1/3/2018	THE LOCAL	COPE Still about the
Our Bibl PST	GGPS Baja Lohi	up till now 1/3/2018		946E(1 M///DOM N/~~-
Nuzhat Ara PST	.l:_		TACTAS	Cher Still absent from b
ן פאן מות ומות ומות ומות	GGPS Harban Kot	i	- 7 ~ 0	YYUUU. II HIIIDDIY MAAA
Tehmina Rohi PST	<u>.</u>		7770 (BB)	Cher still abcont to
i	GGPS Kuz Komila			VEGU II AMMAAA N
Zuhra Bibi PST	GCDCV	up till now	duty pro	chers still absent from her scho
t. h	GGPS Kherza Khel			
		up till now i	t agreed	is still absent from duty proceed please

Sub Divisional Education Officer, (Female) Dassu

1 -11, 214



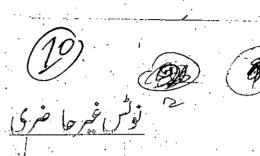


(FEMALE) KOHISTAN

· · · · · · · · · · · · · · · · · · ·	· 12.5
FINAL SHOW CAUSE NOTICE	
	We to Vehicles holinges
I, Mr. Khurshid Ahmed, District Education Office	er, (Male) Konistan, being a
the state of the s	i Octivativo (Elevis)
	ANA WALL PST
do licios	
GGI Jar II	↓
the conort of SDEO (F	Dassu vide No. 438 dated
	ol duties willfully since -
1-17 (2) 10 10 10 10 10 10 10 10 10 10 10 10 10	j dago
16 - 06 - 12018	SDEO vide No. 505 dated
16 - 06 - /2018 2 Also re-verified and recommended by the concern	ed 3DEO vido ivo: 000 dans
23/1/2019 that you remained willding absent. 3. I am satisfied that you have committed the following	18 acts/offissions specified in
	14.25 Aug. 14.25
rule 3 of the said rules: (i) guilty of habitually absenting herself from (duty without prior approval of 📑 🚆
leave.	
, •	
4. As a result thereof, I, as competent authority,	have tentatively decided to
	e salu luico.
5. You are thereof, required to finding show codes of	her you desired to be heard in
5. You are thereof, required to finally show cause as should not be imposed upon you and also intimate wheti	
person. 6. It no reply to this notice is received within seven	defence to put in and in that
days of its delivery it shall be presumed that you have it	D deletibe to put in diameter and
case an ex-parte action shall be taken against you.	a a
9 (2)	C/0/ mass
Endstt: No 2 57 /Dated Kohistan the 2	6/0/ 12019
Conv of the above is forwarded to the:-	
1. Mst; Fargana Wals PSI GGPS Ja	KÅ
1. Wist, 147 100 100 100 100 100 100 100 100 100 10	r sa the sales of
No. 1213 For Insurance Notices see reverse. Rs. Ps.	
Stamps affixed except in case of	
uninsured letters of not more than	COMPETENT AUTHORITY
the initial weight prescribed in the	(District Education officer)
Post Office Guide or on which no	(F) Kohistan
Received a registered*	
addressed to Deje-Stamp	
*Write here "letter", "postcard", "packet" or "parcel" Initials of Receiving Officer with the word "insured" before it when necessary.	
[Insured for Rs. (in figures)]	
7.1,03 Jak	. M
Weight Kilo	1
Insurance fee Rs. Ps. (in words) Grams	
Name and	
address	
of sender	
· · · · · · · · · · · · · · · · ·	ec.

9)

.			
	The state of the s	and the state of t	is
		_ valuatil	
• 	OFFICE OF THE DISTRICT EDUCATION OFFI	ICER, (FEMALE) KOHISTAN.	
	OFFICE OF THE DISTRICT EDUCATION OF		
	No. 41	65	
	Paro	8 - 9 /2019.	
	Dated		
,			
/10,	The Deputy Director information Khyher Pakhtunkhwa Abbottabad		
	SHOW CAUSE NOTICE		
/ Me	lemo,	s of Show cause notice for	*
	Enclosed please find herewith 7 copies of the daily News Papers at least of the budget is available for the advertisement the this office please.	ne in the local Abbottobar charge and the bill may be	
A P	bublishing in the daily	<u> </u>	
5	The budget is available sent to this office please.		
		District Education Officer (Female) Kohistan.	
		() () ()	
	646-71 /DEO (F) KH: Da	ted181 2_/2019	0
	E/No100	V_	w
	Copy forwarded to- 1. The Director E&SE Mayber Pulchtunishwa P	eshawar	~
	7 THE DOPERT AND ORICE! (INVO)		
) Kohistan	
	5. The Deputy District Education Office. 6. The SDEO (F) Dassu, Pattan Pallas	The Tak Sylvion Office	er
		(Female) Kohista	<i>II.</i>
		parcel" cessary	37
		Carlo and the ca	15 6
		Sept 2 Sept 2	Siling O Committee of the committee of t
	De Maria	werse the state of	Weight,
	EAR &	A contract to the contract to	f. Height, (in words)
	TVA.	STATE OF THE STATE	
	W Y	mentano ps. artis movied movie	
!		Forth Commence of the Commence	e fee Rs
		a of Receiver	Standice 3.5
	(4)	LO.	1 =



آپ مندرجہ ذیل معلمات IMU/SDEO/ASDEO کی بورٹ کے مطابق بغیر دجہ ڈیوٹی سے غیر حاضر ہیں۔ آپ اُ کو آپ کی غیر حاضری کے بارے میں زیر یختطی کے دفتر میں موجود آپ کے گھر کے پتہ پر کاشوکا زوٹس بھی جاری کیا جاچے کا ہے کی آپ کی طرف سے تا عال کوئی جو اپ نہیں ملا اور خہ ہی اپ اپنی ڈیوٹی پیر حاضر ہوئی ۔ لہٰذا آپ کو ہذر بعیا خبار آخری نوٹس دیا جا ہے کہ مات (۷) دن کے اندراندر ذیر و تخطی اے دفتر میں حاضر ہوکر اپنی غیر حاضری کی دجہ بتا کیں بصورت دیگر مقررہ عرصہ گزر جانے کے بعد آپ کے خلاف کے اندراندر ذیر و تخطی اے دفتر میں حاضر ہوکر اپنی غیر حاضری کی دجہ بتا کیں بصورت دیگر مقررہ عرصہ گزر جانے کے بعد آپ

۲.	ر .	فمبرثا	
" لّذهبه PST	-	 . 1 .	*
"صدف زیبPST		2	
راقبیه PST	<i>;</i> ,	3	Ļ
المرPST		4	
فرزانهوالPST		5	
شاهین خمیرPST		6	
PSTبابل		. 7	
ינוה אוPST		8	-
تهیسه وی PST		.9	;
PSTذيرالي		10	
نا گینداوتیل PST	·.	11	
شگفته کیمان PST		12	
	الدّهبه PST محدف زيب PST ما تعبير PST ما تعبير PST من المحدد الم	الدّهيه PST المحدة المحدد الم	PST مرف زیب PST عرف زیب PST عرف زیب PST علم القیم PST علم المح المح PST علم المح المح PST علم المح المح PST علم المح المح المح المح المح المح المح ال

ANNIS

& mos

(\$)

	· ,	(P)	
	1		
	6 OF Uly GGPS	PST UU U	13
	गार्ट GGPS	زربینه PST	14
	ર્ગાર્ષ્ટ GGPS	PSTالبالي	15
	GGPS אוטואנ	تا کرهPST	16 -
	ษ ภูป์ GGPS	معصومہPST	17
	להיט GGPS	لطفدPST	18
	GGPSبرک	PSTUU وهاجره	19
	GGPS-يرنو كنديا	راخده بانوPST	L 20:
	GGPS سری گریال	ریکاندPST	21
	GGPs سری کریال	اره قیور PST	22
	، GGPS سويال جنوى	عرض PST - عاجرها دق	23
Corvi Case	GGPS اوسی کا	PSTایال	24
	GGPS بهنی کورنثر یال	PSTour	25
	GGPS بھٹی کورنٹر یال	بخراحفيظPST	26
	GGPS موکنآباد	PST	27
	GGPS نگا آباد	صفيه ذرين PST	28
	بارآ الله GGPS	اهیرنان9ST	29
	<i>/ , /. /</i> . GGPS	PST/t _e	30
W. W.	21/1		0

is here

Je was.

(6)

كاساب عى كن كل يرتيم وكري لوكون كم كرون سے یہ بی ای پر درہ دری ووں عمرون بید چہانے جانے بارے بیمان سےدوت کا سال مگل ماری ہے کیس کی تیم نے میں اضافہ کیا بار اے امرون ے فراد جہم مل الديم أن عكد درمان ارے عمل موال کا تعاب دیے موے کہا کہ بران کل آئی کی اعداد اور ال بدان کا کہنا تھ کوسندہ میں محداث 49 فازمود طردد فزم لنم ساخة وقازمود عا على الريد من 2018 من من المركان المرك المات مدد عام مسكن في أيك وركاد واد على أعدد برم یا رجودی با برمان بدنی ماده باده ارد امیده این نز جامها تا کردید کردس نے اگ جیدے تن مرکز کا باد کا مرکز پرمشینده اگر مارم پرمشین کرداد کا کاس کے کا کا ان کم کے دامند روزار کے ازرائی اس کرد کا کا ان کا کا در بدلا بناب داوئ برداد نے باخاندد کے طائے عل 3 مانے کا استان کا استاد کا اور ان استاد کی استان کا استان کا استان کا ا AK.47مِدُ 15كايَوْنَ. 1عدشين 56 2 1 پُرِل 0 3 پد ادر 5 2 کولیاں مآ دکر لی کی در مشیات آمدا کی می تعاد مدد نواز نے مشیات یں بین سے در سعاد میں اور اس بھا تھا ہے اور الرائیا ایک سے در البار الرائی الر ر خرف کورلی نیسل جاسته که - آمیدس نے کہا کا فرق مشکل کی اس گھڑی شری ندارا در دکار تو - امیدل نے کا 405 کمام عل عابدکر کے قاد مذہبی وبهترين مذاج معالج كي مريخير مقدمدون كرليارتمازيش خودد لخزم 4po کیخت نعيدنات كيمة إلى المس الحق اوقواز على آ مقد مسين **57** = مات مستور ما المهاد توریت کیا سیسدد مرف جائب بافیاتیده عمل در برا تیل مسیت عی افراد کی باکست کی في تولي كيم اوكاملاوكت والمراح المراسكو ولد فالبيك باب نے کہا کے اوٹریٹ ایک موتیہ مرحاول ا مرتاد کردیا جرم تھاندوں ہیں کرمال 2016 ہے۔ چرق اور ڈکٹی کے متد مات شام علوب قارق اندا کا ک والى كىدور مل ليداك 20 كان اب الد متعدد في يمد كما يرض ما المنطق المستعلق المستعلق المنطق المنطق المنطق المنطق المنطق المنطق المنطق المنطق ا المنطقة في المنطق الدين المنطق المنطق المنطقة والا معامده الك رب يمن وو عاسي يمن كراب ور العدن كيليش عن وعدل كراري - فياس الن يمن کےخلافD&⊇ خشياسة تعيينات كيمية في التمارا في الإتحاز فا كارايد نے کیا فوائریف اکستان سے تعدد عندان ہیں، جب ریاحت ہمکررے تھا ہوت ہیں کوان بچروں کا خیل کئی آیاد (ن) لیک سے رہنما تعالمت بھی سے آئے مایر آبال نے ملید منیات مائد دار کو اور بجد فایکان کوکراز کریمیس کے بعد نے 200 کمیم چن بات کریمیس کے مفات تحاد خاک بحل کان بات کریمیس کے مفات تحاد خاک بحل BCNSA کے قت مقدر اردا کر کیا تجات ے وکوں نے دیمن برلیٹ کر جا یم بھا تی الد بازار المانے کے مطابق کی کا اواق کے میڈیا میٹر نے ایک محمل در نے کے حوالے سے اواکہ فیصل نے ایک میٹو مشرق اردائی کا در اس کے درمان میان کے مطابق شان برکے ۴۶ کولایال جیلی ندونا - ۱۳ کا یک اقل قبل کمف اس کاز کارٹ کریٹ کس نکن مارکل ایں تست کی کانا تا ہمارے شاکس نے ضایر کریٹ کے اقل قبلیت ورائع کے کے کی آیاد (ن) کیا ہے دیمانداری بچی سے ائے بچھارے ہوگی آیوں مائیں ہے آیاد موال کے خارے میں کہا کہم (ن) کیا روسے بھی کا کہا تی آئ کی والے ہیں، صافی فیسلوں کیجان سام کاری تیم کری سے دوائی شیم کر مراسک خِلَان المبالى كَاكَ دَمَّاد مُثَالِد المُعَلَّان وَعِلْمَا مِدَان كَامِدَاء 1 مُعَوَّل 13 عِدْ عَلَمْ مُثَالِّد عَلَمْ مُثَلِّمَا عَلَيْمَ مُثَالِّهِ عَلَيْمَ مُثَمَّا ا على من الدين كرا المان المان كريد المان كريد المان كريد كرا المان الراف اورود يك في ديدك أواد كماليا كالدافي سالمیں ولد ہرشتگیں کاکرفادکرے لوم کے خا لينيا ڪ 20 نگان ار متعددتي عوضح وتيرمام بالدول العداديال عل المين تعبياندل مازوماان الدليشيا كيمتول أمكان كالشن يوزكر فرار وك معدوك والديم كالدير محوات آب مندوز لي معلى = IMU/SDEO/ASDEO كي دورت كرميان الجراود إلى ليرماش ري آب كم كيرماش ك كيرماش ك إرساس رو كل دفت في مرجوداً بير يحرب يدي وكافرا والمن كل ما والمطلب لكن آب كالمرف تامال كون جواب يم ما الدوست في أسيد أو يأن غرة مل بيدا آبيا يرويها فها أ تري ولي الإسبال عالمات (ع) دن شكان والادار والتي المان ماخر عن ماخر وكرا يي في الي فرواخري كه وجدنا كل ورات و يوم ترور والي كالبعدات كالله في E&D والروا 2011 تقت يعفرو قانولي قارول كل عمد الأربات كي . مَنَاكُنْ دُيْنُ مَثَالُونِينُ فِي رَ ±åGGPS. مرف نیسPST PST -2 ≟ೆS GGP GGPS پرائی PST. ST GGPS 4 PST J CHOU GGPS. مَّا يَنْ عَرPST. GGPS PST-U/ 6 5 جدیش به سندگارگ سر تریسورد الک دلگ دندر احم قران مان به کش خال مرال دور املادات جر محرفز از کارکم کارک دادن مستقل احد GGP5 عالم PSTOTE 8 • GGPS ادادی PST 6 GGPS وزايل داري المالية GGPS PSTرابار 10 PST(9 للفت كيرانا PS T GGPSادبیاتی PSTکینانگل 12. GGPS ابدان 11 GGPs کیا ا: PST## 14 GGPS بالاثار PST. [176 PER PERS PST∵r 13 IT GGPS 15 41 21 ಆಗರ GGPS . PST 분 18 GGPS ئايرى پخور**پ**PSt 17 نے دروان کا اس کے کانام کی اسٹول کئی کوئی کے پیکا کار کی معالت کی طرف ہے کہا کی کرد جائل کا موق کے کے بعد تحت کا دسائل GGPS براكديا PSTil 20 GGPS. 2 فائد أن ال PST 19 'GGPS يري قريال PST/Zul GGPS يرقو كويال 22 PST-21 الله عند و موس في الكالمات و من الدكت والسط المول الله عند المال كالمع المراحث المراجد Ğ---□GGPS PSTUŽŲ •GGP۶ سيال جزي تا يَرْعَبادِلُ PST 24 23 GGPs توكناتر بال GGPs بحى أوتريال PST PSTER 26 25 IF GGPS سنية زين PST 28 GGPS و كاآباد PST ادر المحل الخان کا کل ساطات بر احلاقی جدیا . سالدر ارد اولان کا دور بر الادل سے کل آداد السن بر اور اور المحلال کے ملا بے کوالی الدر السن کا اس اللہ بی المول کر بالد بر کوالی اللہ **Ź7** Ł72%GGPS PSTル 30 샤 ÇGPS PSTCt/41 GGPS مارين الزليا PST PST L 32 GGPS سباراه PSTI-: GGPs ال 34 ್ರಾರ್ GGPS وو فينه سيد 33 PSTALL برن بلطان PST "GGPSرکان 36 35 GGPsچزابآبا PST GGPS نا نيا (PST 37 38 ماك يالور عادرات والماك والماد الازة ्राटि GGPS. التيم المركب في اليوكيش أفير (زنانه) صلح كوستان (AD) 43 (وزیا م ره از ای

I und

9

14)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

No. 7. F.No. 324/F/Appeal Kohistan

Dated Peshawar the $\frac{\sqrt{2}}{\sqrt{2019}}$

Гс

The District Education Officer, (F) Kohistan

Subject:-

APPEALS REGARDING REMOVEL FROM SERVICE

I am directed to refer to your letter No.5158 dated 02/09/2019 on the subject cited above and to state that the competent authority has rejected the appeals of the following teachers. Hence she may be informed accordingly.

S.No	Name and Designation	School Name
1.	Zarmina PST	GGPS Kemia Abad Kohistan
2.	Salma Bibi PTS	—do— .
3.	Shakira Bibi PST	GGPS Mehran Abad
4,	Gul Bibi PST	GGPS Seral Shah
5.	Sadaf Zeb PST	GGPS Pashot
6.	Shaheen Zameer PST:	GGPS Loohi Dader
7.	Raqiba PST	GGPS Ser Garhi
8.	Nagina Otail PST	GGPS Baja Lohi
9.	Asma PST	GGPS Ser Garhi Kandia
10.	Farzana Wali PST	GGPS Jhakh lohi
11.	Rehana Bibi PST	GGPS Seri Gabrial
12.	[Gul Bibi PST	GGPS Baja Looni
13.	Johajra Bibi PST	GGPS Bar Bak
14.	Gul Shanaz Bibi PST	GGPS Nimraty Sosak Upper
15.	Bibi Rashida PST	GGPS Serto Kandia
16.	Shagufta Kiran PST	GGPS Dhoop Lehi
17.	Huree PST	GGPS Nimraty Sosak Upper
18.	Latifa PST	GGPS Ghee Harban
19	Aisha Qurashi PST	GGPS Habib Abad Koli
20.	Aisha Sadiq	GGPS Soyal Jashoi
21.	Naheed Sartaj PST	GGPS Sanga Abad

Deputy Director (Female) E&SE Khyber Pakhtunkhwa

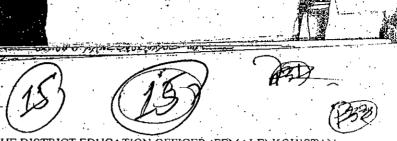
Endst No.____

· Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Deputy Director (Female) E&SE Khyber Pakhtunkhwa

I wal



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

OTIFICATION

Whereas the following teachers were reported wilful absent from duties by the concerned Assistant Sub Divisional Education Officers (Female) and Independent Monitoring Unit (IMU) Kohistan.

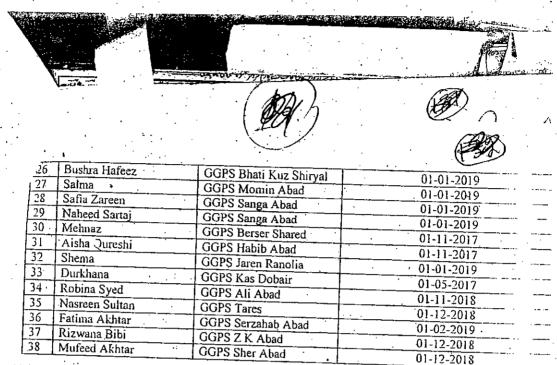
And whereas on the report of the visiting officers, this office issued show cause notices at home address through registered posts but neither the teachers joined their duties nor submitted convincing replies within the stipulated time (15 days) before the committees constituted for personal hearing while this office letter no. 394-98 dated 11-02-2019 and the same were conveyed to the teachers in time.

And whereas final show cause notices were issued through two leading newspapers i.e. Diaty "Hazara News" Mansehra and Daily "Akhbaar" Abbottabad dated 26/02/2019 in which teachers were directed to assume their duties and submit reason (s) of their wilful absence but neither they attended their schools nor submitted convincing replies before the committee within the stipulated partial mentioned in the newspaper. Now in view of the above facts 1, Mr. Khurshid Ahmed, being competent authority, as District Education Officer (female) Kohistan, is fully satisfied to impose major penalty of REMOVAL FROM SERVICE upon the teachers under rule 4b(iii) of E&D Rules 2011 with effect from the dates mentioned against each.

		NAME OF SCHOOL ·	DATE OF REMOVAL FROM
4			SERVICE
1	Lazhaba (G-4)	GGPS Pashot	01-10-2016
2	Sadaf Zeb	GGPS Pashot	01-10-2017
3 6	Raqiba	GGPS Ser Garhi	01-10-2017
4	Asma	GGPS Ser Garhi	01-10-2017
51	Farzana Wali	GGPS Jhakh Lohi 🗸	01-04-2018
6	Shaheen Zameer	GGPS Loohi Dader	01-10-2018
7	Gul Bibi 🗸	GGPS Baja Loohi 🗸	01-04-2018
8	Nuzhat Ara	GGPS Harban kot	01-05-2018
9	Tahmena Roohi	GGPS Kuz Kamila	01-01-2017
10	Zulira Bibi	GGPS Kherza Khail Dader	01-10-2015
11	Nagina Otail (G-4)	GGPS Baja Lohi	01-05-2016
12	Shagufta Kiran	GGPS Dhoop Lohi	01-01-2019
13	Gul Bibi	GGPS Seral Shah	01-04-2018
14	Zarmina	GGPS Kemia Abad	01-01-2019
15	Salma Bibi	GGPS Kemia Abad	01-01-2019
_ 16	Shakira	GGPS Mehran Abad	01-03-2018
17	Masooma	GGPS Ghee Harban	01-04-2018
18	Latifa	GGPS Ghee Harban	01-01-2019
19	Johajra Bibi	GGPS Bar Bak	01-04-2018
- 20.	Rasheeda Bano	GGPS Serto Kandia	01-10-2017
21 م	Rehana	GGPS Seri Gabrial	01-01-2019
. 22	Sara Qayum	GGPS Seri Gabrial	01-11-2018
23	Aisha Sadiq.	GGPS Soyal Jashoi	01-04-2018
24	Bibi Hawa (G-4)	GGPS Awaysach	01-12-2016
25	Falimeeda	GGPS Bhati Kuz Shrial	01-11-2017

h was





NOTE: Any teacher who is found involved in any embezzlement of fund/conditional grant, she with the proceeded for FIR/Anti-corruption proceedings as and when reported at any stage. Concerned DDOs at a directed to recover the payment (if any) made for absence period out of their GPF etc.

> CATION OFFICER (F) KOHISTAN-

Endst No: 1198-1210 صد : Dated

Copy for Information to:

- Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner Kohistan.
- 3. Deputy Commissioner Kohistan Lower.
- Deputy Commissioner Kolai Palas Kohistan.
- 5. District Monitoring Officer Kohistan.
- DEO (M) Kohistan Lower & Kolai Palas Kohistan. 6.
- 7. District Accounts Officer Kohistan. 8.
- PA to Advisor to CM for Elementary & Secondary Education Khyber Pakhtunkhwa. 9.
- PA to Secretary (E&SE) Govt of Khyber Pakhtunkhwa Peshawar. 10.
- All concerned teachers.
- PA to DEO (M/F) Kohistan. 11.
- Office copy. 12.

DISTRICT EDWCATION OFFICER (F) КФНІЗТАН



DIRECTORATE ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr.Shah Wali Ullah Representative for DEO (F) Kohistan Upper to attend the Khyber Pakhtunkhwa Service Tribunal in connection with submission of para wise comments in Service Appeal No._7849/2021,1484/2019,1473/2021, Mst Faiza Bibi, & Mst Farzana Wali Mst Gul Bibi VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department

Director

Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Ir. Muhammod Ilbof

Dr. muhammand I Ebal
Mr. mohtasim Billish
Mr. farreen Begus