## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUAL. PESHAWAR

#### Appeal No. 997/2015

Date of Institution ... 28.08.2015

Date of Decision ... 14.12.2017

Aleem Shah, Chowkidar, GGPS Nazir Gul, Koroona, District, Charsadda. (Appellant)

#### <u>VERSUS</u>

1. Government of Khyber Pakhtunkhwa through Secretary E&SE, Peshawar and 3 others. ... (Respondents)

MR. YASIR SALEEM, Advocate

.. For appellant

MR. KABIRULLAH KHATTAK, Additional Advocate General

... For respondents

MR. NIAZ MUHAMMAD KHAN, MR. MUHAMMAD AMIN KHAN KUNDI,

## CHAIRMAN MEMBER

#### JUDGMENT

<u>NIAZ MUIHAMMAD KHAN, CHAIRMAN.</u> This judgment shall also dispose of connected service appeal No. 358/2015 as common questions of law and facts are involved in both the appeals.

2. Arguments of the learned counsel for the parties heard and record perused.

#### FACTS

3. The appellants were appointed on 24.12.2012 and they took charge thereafter but they were not paid the salary. That the appellants had been applying for release of their pay to the respondents but their grievance were not redressed. That on 28.05.2014, the District Education Officer had also written a letter to the District Accounts Officer regarding the confirmation of appointments of the appellants. That the Headmistress of the concerned school had also given a certificate regarding the duties of the appellants. That on 06.5.2015 the appellants filed an application to the EDO for release of their pay but on 11.5.2015 a letter was issued to the appellants for explaining their absence.

#### ARGUMENTS.

4. The learned counsel for the appellants argued that the appellants were appointed. They had been performing their duties. That many applications were moved to the department for release of their pay. That their duties were verified by the concerned Headmistress as well as the EDO concerned. That suddenly a notice of absence was issued to the appellants. That the case of the appellants was well founded.

5. On the other hand the learned Addl. Advocate General argued that the appellants were not civil servants as their appointment letters were not owned by the department. That the appointment letters of the appellants were bogus. That Aleem Shah, appellant had filed an affidavit admitting his appointment letter as bogus. That thereafter, he has been re-employed recently. That the appeal of Aleem Shah has become infructuous.

## CONCLUSION.

6. The record available on the file shows that there was an order of appointment (bogus or genuine) but the record also speaks of verification of service by Headmistress and concerned EDO. The explanation of absence is itself proof that the appellants were civil servants. But this Tribunal cannot finally decide that what is the actual position regarding the genuineness of the appointment letters. That with the re-employment of Aleem Shah, his appeal does not become infructuous in case of his previous service.

7. This Tribunal in the interest of justice remit the appeals to the departmental appellate authority with the direction to probe into the matter regarding genuineness or otherwise of appointment letters including the certificates given by the Headmistress as well as EDO and the explanation for absence. He should also give detail reasons through speaking order regarding all the issues including nonpayment of salary within a period of ninety days from the date of receipt of this judgment, failing which the appellants shall be deemed to have been validly appointed. Parties are left to bear their own costs. File be consigned to the record room.

(NIAZ MUHHAMMAD KHAN) CHAIRMAN

hammadamin (MUHAMMAD AMIN KHAN KUNDI)

MEMBER

<u>ANNOUNCEE</u> 14.12.2017

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997/15

13.12.2017

Counsel for the appellant and Addl. AG alongwith Mudassir, ADO for the respondents present. Arguments partly heard. To come up for further arguments on 14.12.2017 before this D.B.

#### MEMBER

### CHAIRMAN

## 14.12.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. Advocate General alongwith Muddassir Shah, ADO for respondents present. Arguments heard and record perused.

This appeal is remitted to the departmental appellate authority as per our detailed judgment of today. Parties are left to bear their own costs. File be consigned to the record room.

minar Amin CHAIRMAN MEMBER

ANNOUNCED 14.12.2017 Counse<sup>1</sup> for the appellant and Mr. Muhammad Jan, GP for the respondents present. Counsel for the appellant submitted Wakalat Nama and requested for adjournment. To come up for final hearing alongwith identical service appeals on 23.05.2017 before D.B.

Member

23.05.2017

Counsel for the appellant present. Mr. Ziaullah, Deputy District Attorney for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 13.09.2017 before D.B.

(GUL ZEB KHAN) MEMBER

13.09.2017

Counsel for the appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents present. The learned Member Executive, Mr. Gul Zeb Khan is on leave therefore, arguments could not be heard. Adjourned. To come up for arguments on 13.12.2017 before D.B.

(MUHAMMAD AMIN KHAN KUNDI)

**MEMBER** 

Tman

Counsel for the appellant, M/S Hameed-ur-Rehamn, AD (lit.), Muhammad Sajjad, Assistant Account Officer and Mudassir Shah, ADO alongwith Addl: A:G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 17.8.2016.

17.08.2016

Agent to counsel for the appellant and Syed Mudassir Shah, ADO (lit.) alongwith Additional AG for respondents present. Rejoinder on behalf the appellant submitted and requested for adjournment Request accepted. Adjourned for arguments to

Chairman

12 - 12 - 16 before D.B. Memper

12.12.2016 Since 12<sup>th</sup> December, 2016 has been declared as a public holiday an account of 12<sup>th</sup> Rabi-ul-awal. Case is adjourned to 07.04..2017 before D.B.

Reade

29.09.2015

iellant Deposited

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Appellant with counsel present. Learned counsel for the appellant argued that the appellant was appointed as Chowkidar, a class-iv employee, in GGPS, Nazir Gul Koroona, District Charsadda vide appointment order dated 27.12.2012. That he assumed charge of his position in the prescribed manners but was not paid salary constraining him to prefer departmental appeal on 6.5.2015 which was not responded and hence the instant service appeal on 28.8.2015.

That the appellant is entitled to earn the salary as he was appointed against the said post in the prescribed manners against quota reserved for employees' sons.

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 3.12.2015 before S.B.



Appellant in person, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) and Muhammad Sajjad, District Accounts Officer alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 22.2.2016 before S.B.

#### 22.02.2016

03.12-2015

Counsel for the appellant, M/S Khurshid Khan, SO, Hameedur-Rehman, AD (lit.) and Muhammad Sajjad, AAO alongwith Assistant AG for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 26.4.2016 before S.B.



# FORM-A

# FORM OF ORDER SHEET

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	Court	
	Case No	997 /2015
	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	03.09.2015	The appeal of Mr. Aleem Shah resubmitted to-
		day by Mr. Ijaz Anwar, Advocate, may be entered in the
		institution register and put up to the Worthy Chairman for
		preliminary hearing. REGISTRAR
	11-9-18	This case is entrusted to S. Bench for preliminary
		hearing to be put up there on $4 - 1.5$
		CHAIRMAN
	11.09.2015	Agent of counsel for the appellant present. Seeks
3		adjournment. Adjourned to 29.9.2015 for preliminary hearing
		before S.B.
		Chatrman

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The appeal of Mr. Aleem Shah received to-day i.e. on 28.08.2015, is incomplete on the following scores, which is returned to his counsel for completion and resubmission within 15 days:-

1. Wakalatnama has not been attached with the appeal, which may be placed on file.

2. Annexures of the appeal may be attested by the appellant or his counsel.

No. 1335 /ST, Dated 2/9/15 /2015

KPK SERVICE TRIBUNAL, PESHAWAR.

#### MR. IJAZ ANWAR, ADVOCATE, PESHAWAR

Sir, Resubmetter offinta Complent

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# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.<u>**997**</u>/2015

Aleem shah, Chowkidar GGPS, Nazir Gul Koroona. District Charsadda. (Appellant)

# VERSUS .

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Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others. (Respondents)

S No "	Description of documents	n Annexure:	Page No.
1	Memo of appeal		1 - 4
2	Affidavit		5
3	Copy of the appointment order dated 27.12.2012	A	6
4	Copies of the Medical Certificate, Charge Report and Service Book	B, C and D	7-10
5	Copies of the attendance Register and Duty Certificate dated 24.11.2014	E and F	11 - 33
6	Copies of the applications	G	34-36
7.	Copy of the letter dated 28.05.2014	H	<u>34-36</u> 37
8	Copies of the Application dated 21.01.2015 and letter dated 22.01.2015	I and J	38-39
9	Copies of the Departmental appeal dated 06.05.2015, Notice dated 11.05.2015, Reply to the Notice and duty certificate dated 13.05.2015	i	40-43
10	Vakalatnama		44

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Through

IJ ZANWAR Advocate, Peshawar

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SAJID AMIN

Advocate, Péshawar

O.W.F Province Borvice Tribunel Distry No. 10/3. Distud 28 - 8-2015

# BEFORE THE KHYBER PAKHTUNKWA SERVICE TRIBUNAL PESHAWAR

Appeal No. <u>997</u>/2015

Aleem shah, Chowkidar GGPS, Nazir Gul Koroona, District Charsadda. (Appellant)

## VERSUS

- 1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer (Female) Charsadda.
- 4. District Accounts Officer, Charsadda.

#### (Respondents)

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, for directing the respondents to release salary of the appellant w.e.f 27.12.2012 till date and onwards and against not taking action on the departmental appeal dated 06.05.2015 despite the lapse of 90 days statutory period.

Prayer in appeal

- - Ittad

On acceptance of this appeal the respondents may kindly be directed to release the salary of the appellant w.e.f 27.12.2012 till date and onwards with all arrears and back benefits.

Respectfully submitted,

That upon the recommendation of the Departmental District Selection Committee, the appellant was initially appointed as Chokidar in BPS-1 against the 25% quota reserved for class four employees children vide order dated 27.12.2012 against vacant post at GGPS Nazir Gul Koroona Charsadda. (Copy of the appointment order dated 27.12.2012, is attached as Annexure A)

- 2. That the appellant was also medically examined and when found fit he duly took over charge of his post and started performing his duties. It is pertinent to mention here that the service book of the appellant was also prepared for the purpose of pay and pension. (Copies of the Medical Certificate, Charge Report and Service Book are attached as Annexure B, C & D)
- 3. That ever since his appointment the appellant is continuously performing his duties with zeal and devotion without any complaint whatsoever regarding his performance. (Copies of the attendance Register and Duty Certificate dated 24.11.2014 are attached as Annexure E & F)
- 4. That though the appellant is continuously performing his duties, however he was not paid his salary since his appointment, the appellant time and again approached the respondents' office and submitted different applications for the release of his salary but he was only given verbal assurances that his case for the release of salary is in process and it will be released after fulfilling the codal formalities, therefore the appellant waited with hope that his salary will be released. (Copies of the applications are attached as Annexure G)
- 5. That in the meantime the District Accounts Officer Charsadda, vide letter dated 22.10.2013, asked for the verification of the appointment order of the appellant, accordingly the order was verified and re-submitted to the District Accounts Officer Charsadda vide letter dated 28.05.2014. (Copy of the letter dated 28.05.2014, is attached as Annexure H)
- 6. That the appellant throughout agitated the matter of his release of salary but to no avail, he also filed an application dated 21.01.2015, to the Respondent No. 1, the same was forwarded to the Respondent No. 3 vide letter dated 22.01.2015, however the salary of the appellant has not been released. (Copies of the Application dated 21.01.2015 and letter dated 22.01.2015, are attached as Annexure I & J)
- 7. That as a last resort the appellant submitted his departmental appeal dated 06.05.2015, however instead of taking any action on the appeal, the Respondent No. 3 served the appellant with a false and baseless absence notice dated 11.05.2015, the appellant duly

replied the notice and refuted the baseless allegation of absence from duty, moreover he also produced duty certificate from the concerned Headmistress. Thereafter the appellant waited for the outcome of his departmental appeal but the same has also not been responded the lapse of 90 days hence the instant appeal. (Copies of the Departmental appeal dated 06.05.2015, Notice dated 11.05.2015, Reply to the Notice and duty certificate dated 13.05.2015 are attached as Annexure K, L, M, N, O)

8. That the appellant prays for the acceptance of his appeal inter alia on the following grounds:

## GROUNDS OF DEPARTMENTAL APPEAL

- A. That the appellant have not been treated in accordance with law, hence his rights secured and guaranteed under the law are badly violated.
- B. That the appellant was appointed by the competent authority after observing all codal formalities, the appellant duly took over charge of his post and is performing his duties for more then 2 years, the order of the appointment is thus acted upon and valuable rights have been created in favor of the appellant the same cannot be undone or snatched away from him illegally.
- C. That the appellant have never been proceeded against, nor any charge sheet or show cause notice has ever been served upon him, his services have not been terminated, he is on the strength of the Respondent Department, since he is regularly performing his duties, therefore withholding of his salary without any reason is illegal unlawful against the law and facts.
- D. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice the salary of the applicant has been withheld since his appointment i.e 27.12.2012.
- E. That the appellant have been denied of his livelihood, which amounts to violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1974.
- F. That not releasing salary of the appellant is also violation of section 4 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, besides violation of his fundamental rights guaranteed and secured to him under the Constitution of Pakistan, 1973.

G. That the appellant throughout agitated the matter of his release of his salary and continuously approached the Respondent department, however his salary has not been released till date. Since denial of monthly salary to the appellant is a continuous wrong thus being recurring cause of action no period of attracted to the instant case.

H. That the services of the appellant have not been terminated nor any disciplinary action has ever been initiated against him, he is on the strength of the department and is continuously performing his duties, thus under no circumstances he can be denied of his salary.

I. That the appellant has never committed any act or omission which could be termed as misconduct, moreover the absence notice that served upon the appellant is also baseless and false, the appellant never absented himself, he is continuously performing his duties, the concerned Headmistress has also admitted that the appellant is performing his duties honestly and has issued duties certificates time to time albeit the appellant has been deprived from his salary since his appointment for reasons best known to the respondents.

J. That the appellant belongs to a poor family and has a large family dependent upon him, moreover the appellant have no other source of income, due to the withholding of his salary his whole family is thus suffering.

K. That the appellant seeks permission of this Honourable court to rely on additional grounds at the time of hearing of the appeal.

It is, therefore, humbly prayed that on acceptance of this appeal the respondents may kindly be directed to release the salary of the appellant w.e.f 27.12.2012 till date and onwards with all arrears and back benefits.

Through

IJAZINWAR Advocate, Peshawar

& SAJID AMIN Advocate, Peshawar

# **BEFORE THE KHYBER PAKHTUNKHWA** SERVICE TRIBUNAL PESHAWAR

#### Appeal No. /2015

Aleem shah, Chowkidar GGPS, Nazir Gul Koroona. District (Appellant)` Charsadda.

## **VERSUS**

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

(Respondents)

# AFFIDAVIT

I. Aleem shah, Chowkidar GGPS, Nazir Gul Koroona. District Charsadda, do hereby solemnly affirm and declare on oath that the contents of the above noted appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

Deponent

ATTESTE

بعدالت محل مرجس مراس مرام ورخه مقدم دعوي جرم باعث تحرير آنكه مقد مه مندرجه عنوان بالامیں اپنی طرف سے واسطے پیروی وجواب دہی دکل کا روائی متعلقہ يلخ ما مسلم الموكيين . آن مقام كمعد كرمر مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ کرنے وتقر رثالث وفیصلہ پر حلف دیئے جواب دہی اورا قبال دعویٰ اور بصورت د گری کر نے اجراءاور دصولی چیک در د پیدار عرضی دعویٰ اور درخواست ہرشم کی تصدیق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری یکطرفہ یا پیل کی برامدگ اور منسوخی نیز دائر کرنے ایپل نگرانی ونظر ثانی و پیروی کرنے کا مختار ہوگا۔از بصورت ضرورت مقدمہ مذکور کے کل یاجزوی کا روائی کے واسطے اور دکیل یا مختار قانونی کواپنے ہمراہ یا اپنے بجائے تقر رکااختیار ہوگا۔اورصاحب مقرر شدہ کوبھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اوراس کاساختہ پرداختہ منظور وقبول ہوگا دوران مقدمہ میں جوخر چہ ہرجانہ التوائے مقدمہ کے سب ہوتو کی تاریخ بیشی مقام دورہ پر ہو یا حد ہے باہر ہوتو دکیل صاحب پابند ہوں 2 گے۔ کہ پیرو**ی ن**دکورکریں۔لہٰذا دکالت نامہ کھوریا کہ سندر ہے۔ المرقوم ,<u>20/7</u> 07 And And Shader up Que Clin چوك مشتئكر ي پشاور ي نون: 2220193 Mob: 0345-9223239

ANNEAU-

Convergence upon the recommendations of Departments District relation. Committee, Muhammad alean Shah S/O Gul Fakhar Shah resident of Parao Korresto Nisatta Diste Charsadda is hereby appointed as Chownidar in BPS-1(4800-150-9300)NON PENSIOABLE) plus usual allowances as admissible under the rules at GGPS Nazir Gul Koroona Charsadda against the vacant post in the interest of public service with effect from the date of his/her taking over charge against 25% quota on the following Terms and conditions;-

Terms and conditions

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- 1. The appointment is made purely on temporary basis and is liable to
- termination at any time without assigning any reason or notice.
- 2. She/He should produce Health and age certificate from the
  - MedicalSuperintendent
  - DHQ, Hospital Charsadda.
- 3. She/He should not be handed over charge if his age is less than 18 or more than 45 years.
- 4. If She/he wish to resign from service, he will have to submit one month prior Notice or forfeit one month pay to Governmen.
- 5, His /Her service will be on regular basis but non pensionable.
  - 6 No TA/DA etc is allowed being first appointment.

(Attaullah Khan) Executive District Officer E&SE Charsadda. Endst: No. 37/4-18 /Datec /2012 Copy for information and necessary action to the :-District Accounts Officer Charsauda. 2. DDO(M/F)E&SE Charsadda.. 3. Principal/Headmistress/Headmaster concerned. 4. Candidate concerned.. 5. Office file. Executive District Officer Plenie Ainers E& SE Charsaddau D.E.O (E) Charsadda Allelen

HNNEX GS & PD--NWFP-27 FS-2000 P of 100--29 7-98-(16) N.W.F.P. Med, No. 4 MEDICAL CERTIFICATE MUHAMMAD ALEEM SHAH ~ Name of Official Agghani / Caste or race \_\_\_\_\_ Father's Name CAUL FAICHAR SHAH Residence Nillatta, Dirtt & Tehril Charita Ida. Date of birth 01 - 01 - 1994Exact height by measurement 5' - 8''Personal mark of identification 17101-4796116-3 V Signature of the Official Signature of head of office Seal of Office I do hereby certify that I have examined Mr. Muhammand aleen that candidate for employment in the office of the Education department and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except\_\_\_/ I do not consider this as disqualification for employment in the office of the \_ His age according to his own statement is 18 years 2+20B - 18 /21 years and by appearance about years. ajnj Medical Superintendept DHQ Hospital Charsadda Medical SuperIntendent DHQ. Hospital Charsadde 2013 Ŷ.÷

INER TO GERALD 1 21-1-2013 R. E 0 La 3 J 1/ 0 L 27/12/2 (main 1) ( ) 27/12/2 2.13 ار گران از گرانس از از می از در درونه ورسوب 1 3 52013 0 10 21 مرم) Tal, and the sin 10 × 1,2,10 July 1 6 を」 (BSE) (Feinale) inarsadda

ANNEDS " 1. Name (rt) \_\_\_\_\_ NAMMAD ALEEM SHAH Nationality and Religion \_\_\_\_\_\_AFGHAW 2. (قوميت ادرمذ جُبْ) Residence MisaTTa DisTE a Texsit Chassadda 3. (مستقل رمائش). Father's name and residence GUL FAKHAR SHAH (والدكانام إدرية) Date of birth by Christian era as nearly as 01 - 01 - 19945. can be ascertained \_\_\_\_\_ 955 January Nº 4 a Minut (تاریخ پیدائش مطابق سن عیسوی) 6. Exact height by measurement \_\_\_\_\_5 \_\_\_\_ (قدوقامت) Personal mark of identification 17101-4796116-3 7. (نتبان شناخت) Left hand/right hand thumb and finger impressions of (Non-gazetted officer) (مرد کی صورت میں با ئیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانا ہے) Rind Middle 🐻 Little Fore Finger (انگشت شهادت) .Signature of Government Servant .... • (سرکاری ملازم کے دستخط) 10. Signature and designation of the Head of the office or other Attesting officer Sub Divisional Edu Office · (Female) Chu ..... ( تصدیق کنندہ افسر کے دستخط اورمہر ) Note : The enteries in this page should be renewed or re-attested at least every fiv years and the signatures in Lines 9 and 10 should be dated. Finger prints need not

taken after every 5 years under this rule.

سیسیندرجات کم از کم پانچ سال بعد تقیدیق ہونا ضررری ہیں اور نمبر 9اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہئے۔ سیسیسیسی کے لئے ہریا بچ سال کے بعد تقیدیق کی ضرورت نہیں ۔

1. 2. 3. 4. 5. 6. 7. 8. . . Whether Substantive or officiating and whether If officiating ı Other emoluments falling under the state (i) substantive appointment or Pay in . Additional Date of appointment Signatur Governn substantive pay for Officiating (ii) whether service counts for permanent or temporary Postion servai term pay Name of Post ماسوائے تنخواہ دیگر الاونس pension under rule 3.20 of C.S.R (Pb.) Volume li : تنخواه كبطور عارضى ستقل تاريخ تفررى زائد تخواه بطورقائم مقام ستخط ۰, اكر عارضي ہوتو عارضي ملازمت Ĩ ورجبه ملازمت ردل کے مطابق پنشن کا ی ملازم · قائم مقام متى ب<sup>:</sup> Ρ́s 'Rs. Ps Rs. Cloutodas . Ŕ 21-1-13 ØS 4,900 -N MCA Ru ۰. Ń ec . (dor .00 ü ۲ · . . . . . . . . . • . • ۰. ۰. . ۰. . ^ , . . . , . • . . • . . . • • , • . ۰ . . . . • ÷, . . ÷. , . . . . . .• . • • . iC .H. N -. . . . ÷.,, . · · . . . . . . : . . **^**| . . l

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15. 13. 14. 12. 10. 11. 9. Reference to any recorded Allocation of period of Reason of termination Nature Signature and leave of average pay up to four months (or earned and duration Date of Signature of the Head of the wignation of Signature of Punishment or (Such as Promotion, leave not exceeding 120 days) to which leave salary is debitable to another Government the Head of the termination censure, reward or praised of the the Head of the Office or or appointment of Office or other attesting Officer in attestation of office or other attesting Officer leave taken. transfer, dismissal other Attesting officer Government columns 1 to 8 etc.) servants چار ماہ تک کی رخصت کے رخصت کی تاريخ انقطاع وجوبات سزايا جزايا وستخط لئے اوسط تخواہ کاتعین · انقطاع ملا زم، دستخط غیرمناسب کارکردگی وستخط نوعيت افسرمجاز Goveronment to which debitable. ترقى تتادله افسرمجاز افسرمجاز ملازمت ومعيار Period يأبرطرفي كاربكارڈ ۴ هر رتمنت جسيرتم ادابوكي ADDIO Clowbo day AS TISTE DIVISIONALEPU fjüe ÷ Nasis Gul (Female) \$ Hacal , asainst Th J Olcore ł asi ole. DO ζ. F. 17 4 Dec 1.1. -18 sole 371 Ø 1  $\vee \phi$ 105 2012 27-12 Sub Divisional Edu: Office: (Female) Ctd . ۰. ; .... . / <sup>. .</sup> . \$ ¥ ·.... ļ × . ; . ٠. ٠ ٠. ٠ţ. 3

MANNAN E
ر جسط حا <b>ضری المکر ترمین کو رغبہ کو تبید کا تریخ کا کر پر کا کر</b> یں لنہ کا ک
F 2015
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جسر حاضرى مُدرَّسين سُويَسُ رمزم الأرم مع المان مراكل لار المراح 21062 بابت ماه فخر درک Ul gul 8 26 25 8 نام P.H.<u>S.7</u> عهده .7 10/2  $\mathcal{P}_{\mathbf{i}}$  . S تاريخ آمد دستخط وستخط وستخط وستخط آمد دستخط روائگی آيد رواتكى روانگی دستخط دستخط آيد التتحويل روائگی ų, SII, 32 J. ١ 14 1/1 11 13/\* Ť W. Ī 1130 830 849 50 ۲ 1-3-(V #, 2 8.0 8-0 Se 1:30 Hiller Ô ٣ 810 .0. 1-37 ALL 8.00 ۴ NHS 1130 pint 5 500 Abs Ahb 2. . .... ۵ Ż ک 11:30 think 5200 112 E ۲ 46.6-03. April 8.0 1: 3-54/12 8:00 ach l 4 1.3. Ab5 8.3 Bala b 5/4 Loui 5461 ٨  $\mathcal{O}$ SH YK 134 ers! 144 NY/ 1434 ىرىچ SV/ 841 WHK/ 1 9 The B 1:30 2005 8:00 <u>42422</u> Add 1.3. 8-3. 1.30 00925 مرين مدان 10 E YOT Abret 1.3. anh 2.3. 1:3- 52728 800 Sing 11 12 14-11-23 30 C. S 130 01 115 8:00 Ir 112' 83 11:30 DUS 810 12 123-Ab/218 3" 10 cleave 8.3 AH 1 3 Uti a N. 121, 14/2 24 NY/ 以此 10 1 14 • -VYY 2 2) S.Mr (SV 11/ 131 1:30 dip \$ 8:00 م فأريد حرب 14 1.3. tAtch 2.3. مر المرابي مرجع 1:30 2458.00 12 Aur Abril 3. <u>×·3</u> 00: 93 - 1: 30 Visit 8: 00 8.3.  $|\Lambda|$ Ht.L. HR L 1:30 13. 9 1A hir #Atzh: 8.3. P laa 1.3001458:00 8:3 1230 1-+ Abo AN Y 8:3 À. ALC 5 ۲, چ، ii-1 1.37 P110 029 ٢٢, <del>،</del> ب ب فر ت Ŷr مردم الم مردم الم W LIZ 1:30 60 <del>Z.0</del> 455 ¥151 130 CF18 ۲Ŵ 8:00 ADD 8.3 Fr. GR 212 ÛN. 1:30 446 8100 10 87 -1:30 1.25 8:00 I. S. r.h ĄŢ 42.2 R 30 11:3-01-12 8:00 جر نوارکه عربه ک ¥2  $(\iota_{\iota^{\pm}})$ 1-12/2 83 4 1:300 4.16 8:00 ites up ALI ۴٨ 4-5-8.3 12-30 19 : ` 10 4 ٣1 ردخه حال ميزان حال ميزان سايقه ميزان سابقه حال سابقه ميزان سألقه حال أتفاقيه استحقاقي یماری I ميزان . | | دستخط ہیڑ ماسٹر

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دستخط هيثر ماستر

Ð ب ننرایر مل تو رون نیزاو <u>س</u> كوركمبسط ارجسط ركمز ليراكد عرب س کامُد ترمین 0 5 2 m/4 بابت ماه 49 -1 - 1 2 نام m. us ł 5.7 12 عہدہ PSI. دستخط ردانگی دستخط آمد وستتخط ردائلي وستتخط ,آمد وستخط ردانتكى وستتخط تاريخ ا آمد دستخط آيد ردائقي دستخط 1 11 ۲ < ٣. V s, ٠ pr 1 ۵.  $\mathcal{T}$ ۲ ۷ D 17.3 -7.3° Ø 7.3. 5.A 12.3. 4.2 12.3-Ha 5-1 ۸ 7.3. R 12.30 7.30 Þ 7.3. NJ 12.3 S. A 12. 3. Hið 9 S.A 73. 1.3 P P <u>7.30</u> *L*., 12.3. S.A His 23 12.5 5.0 7.3. . P ہ\_ Ρ 12.3 7.30 Hid 12.31 Ha 3.3. S.A 11.304 7.30 11 A P 12-30 P <u>7·3-</u> 42 12:30 11.2 2.3. S A SA 11 12.3. 7.2 31/ 12 分か 1/2 31 ر ۱ S.E. ~~~~ 54 <u>بال</u> 112 余学 12 11 11 12.30 8 7.30 Hia 12.3. H.a 7.3. S.A SA 10 12.3. 7 .3. 12:30 n P 7.2 . Hia 12.20 14.2 3. S.D 2.3. 10 S.A . z . 127 7.3-P 1-1-2 12.3 Ha S.A 7:3-1.31 14 S.A . 7·3• р 12.7, P 7.3. H·Ə SA. 12.3. H.J 3. h2.30 5.4 7.3. 12 F. 2 12.5 7.5 2 PFRONK 5.A 1.A I۸ 12.20 730 7.3. 12.7 (D 4.0 4.2 122. Ś.A Δ 12.2. 7.3 19  $\sigma'$ \* 24 1 ! がい 1 JK. 3% 3161 رالد \$4 ۲+ 130 2.20 4.2 7:30 12.32 11:2 S.A 2:3 11 7.0 7.3 2.5 H.Z 17.3. H.a 7:3. SA 23-S.A 27 7.3. Þ 12.3 Q 7.31 4-5 12:3-Ho 7.30 \$ 1) <u>Ś</u> <u>A</u> 7·31 ٢٣ ろ 7.3 . P 42 12.3 H.2  $\overline{\zeta}$ ر 7.3 ٢r **،** ، j. Z. 11.3 7:3 8 5 0 8.23 5A 10 7.31  $\hat{v}$ 2.3. P 2.30 4.2 12.3. H-5 SD 2. z. 7:30 ٢٦ Z- 3 2 (Y) J'al ſ 314 لو 3 11 Ster. SU. 5% 1 SH4 »XY ۲2 P 12.3. R 7.30 14.3 19.30 Ho ٢٨ P R 2.3 7.3. S.A Ne (0. Ch 12-20 Ś·Ď 7.30 19 ଚ 2.3 R 7.3 50 12.3.11.0. 7.30 12.312 42 ٣. " سايقه ميزان سابقه ميزان = مردخصہ حال ميزان سابقه حال احال ميزان سابقه حال ت[[ اتفاقيه استحقاقي --بياري ŧ ميزان وستخط هيثر ماسثر ļ

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دستخط ميثر ماستر		

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Qb; 5-1-رجسٹر حاضری مکد ترسیر 41 July 200 cD بابت ماه رش ہ تحريم 3, 3 Bout نام S P 17. ρ. SI وستخط روانجي *م*ده ع دستخط آر وستخط ردائجي وتتخط بآخد دستخط روانگی وستتخط آمد وستخط روائلي وستخط آمد ناريخ Ø `ρ. 1<u>|·a</u> 12.0 . 4.2 Í 1.3 <u>['00</u> 8.0 2.00 4.2 Ļ ۲ 2. 3., L a) ٣ 4 Ω 1:00 8.00 HA D ۴ Q ·07 in. Z.c چ چ 12 Ha ۵ 600 2 9 8 در 4 ۲ Ø O7. <u>kia</u> 42 in H. D ۷ 0 11.00 Þ <u>8.00</u>  $\mathcal{R} \cdot \sigma$ 14.00 HZ 4.2 Ï 8:0 ٨ e ... 4 < 9 <u>1) - - - (</u> 3.~ 41. 81 5. P 1+ P <u>Z.</u> 1.4 2 8.0 11 P  $\mathcal{O}^{1}$ Ø Ha Ф 2 11 ar P 8-1:8 12 11 <u>(-</u>) P ħ 10 ð -9 1 ्र र 'P P 10 w 0 9.0  $\lesssim$ -1.2 e g.n 14 · 100 4.2 1 6  $\mathcal{L}^{\dagger}$ S. P 51 12 8 ø ł۸ ρ 4-2 8.1 <u>۱</u>۲ R. 2:20 19 P R. -> 8.00 11.0 Ф ۵ . . . ่ อ  $\mathcal{R} \cdot \mathcal{R}$ ; *J*S 1+ D 50 0 8.20 3 RAD لان 11 D 1.04 Ρ 8.20 4 2. Za 1-12 <u>Z ~30</u> 11 19  $\underline{I}$ N Ha R.2 ۲۳ 1. de ŵ  $\mathcal{O}$ <u>8.3</u> ۲۴ (1130) 8.30 17 ٢۵ 8.3 R 8.3 ٢٦ N <u> S.</u>Z P Ω 7.2 ٢2 2. Ľ 83 , 2 ۲۸ L P 8 1-12 f 1-12 11.02 19 8 P 8. 40 02 H.J Rica \* ۳ ٣١ أميزان سابقه حال ميزان سابقه ميزان . حال حال سابقه . میزان تسر رخص ا سايقه حال اتفاقير استحقاقي بيارى ميزان دستخط ہیڈ ماسٹر Alla

) رجسر حاضرى مدرسين الورين یز در المری محدل نزیم می ورد لز د برای ا بابت ماه 🦷 س لد عر نا ج Li 29 . ... U, 61 01 عهده P.S.H.T Z., l, ρ 5 ر والحکی , i T تاريخ آ**ر** روائگی وستخط وسنتخط دستخط آمد وستتخط وستخط روائگی وستتخط وستتخط آ مار وستتخط ردائگی ١ H-J  $\mathcal{D}$ Ŷ 8.00 Ha 1.00 こう ۲ 8.00 Ha 80 P  $\omega$ 0 1.00 ٣ 14-2 H-D 2.00 D Ð Ф う.(, う.~( ۴ 8.00 H-A H-D ρ 1.00 p 2.11. 1100 ۵ 0.10 12/10  $\hat{D}$ 0 Ria <u>c</u>r ۲ <u>م</u>ار ~~ ۷ Ø 8.67 1.00 HA Ø. lin 1.00 ٨ ₽ H-2 ρ -<u></u>) 8:00 2 1.00 1.00 ٩ P 4-2 Ø 8.0 1.00 17 1+ 8.00 1 10 P 3 Q Hid Q.19 1.00  $\boldsymbol{\varSigma}$ 11 . سر in Rios 8.00 HS P 17 Q Xº co P 1:00 ٦ ج J. 11 1 éc Jung Va بالجاج P 18 4-2 Ha 8:00 Ø 8.m 11.00 100 10 Q 15 14 ŧ 14 . ~7  $1\Lambda$ 19 H.g. H.J P D 8.~ 8.00 100 1.00 <u>en</u> ۴+ <u>,</u> 200 d 4 11 142 14-2 P 8 cm 1.00 1,000 1:00 E. 11 14-) 17-2 .00 ρ • c/l : 112 8.00 ٢٣ HQ D 8.00 1.00 O 12 ٢٣ P ŧ Ĺ HA 11.00 8.00 140 D . ٢۵ 1.02 8 22  $\mathbf{O}$ ۲٦ ei g P H.J ۲2 4.2 1.00 8:00 .00 Q.con ₽ ٢٨ 2 Q. m Ø 11-2 ·UNO ~ Q. 19  $\mathcal{P}$ Ø 8- (d 1.00 P 8.00 Hw ٣+ Чð 8. р 1w 21 . م دخص ميزان . سالقبر أميزان إلميزان سالقير حال حال سالقه سالفيه حال ميزان حال picet اتفاقيه še  $\mathcal{N}$ ۶ 010/50 Ref استحقاقي ~ Job Star 03 بيارى Nac Nee ميزان eny. 10 ASSESSED FROM CONTRACT فخط تهيڑ ماسط  $^{\vee}$ Aden

98 ن ندیر مل حراف فی ملکی ا رجسر حاضرى مدرينان كدر المنابع كرا 5/1 بابت ماه csicsion نام L عهده ρ 0. روانکی وستتخط دستخط روانجى آمد دستخط وستخط آر روانگی روانگی وستخط ردائجي دستخط 1,1 وستخط تاريخ آبد دستخط la X 3 Ŭ h C Ĩ a ſ. ρ ጵ ルコ 11.7 8 ۲ 0 2 Ru 8 ٣ P 0 Hi 8.1 . 07 ۴ ρ () 8 -6 ۵ 0 R \$ 0 ۲ 8.0 8-0 ۷ 8 ٨ R Ø Q. 0-80 2 ~ ρ 0.00 1.0 9 1+ P Ø Bra 9 જ 8 11 1.00 P Ð 8.00 8.0 11 2.0 2 0 5 . ۳ 11 Q. 1.20 Ű. ß 5.0 4 8-0 ۱ŕ 1.00 ding  $\leq$ C ~---10 R.m. D 0 1.0 4.5 8.00 M D 10 ļ۷ P f٨ P <u>ll</u> Ø 2.0 72 14-2 8.00 19 0 2 in 11.00 8. ۲. n p 2 1.00 ρ 1-2 8 0 11 S 0 1-5 ٢٢ P D مت تو vo 8 ۲٣ 挖 8.00 Ĥ . ٢٣ Ĺ how 12 8.00 OD 10 ρ 8. er 14 P <u>8.c</u> MAL ۲2 8 22 Ð Ha 8.00 .00 ۲۸ d me こし 'Or ¢. -Ľ 19 Ð 7.... D .00 4.2 40 <u>Geor</u> <u>İ on</u> ٣. ٣١ ميزان ميزان سالقيه حال ا حال: حال ميزان سابقه ميزان . سابقيه ر زرخت سابقه حال  $\cap$ اتفاقيه ì استحقاقي (•\ X P N. John /// بيارى 3 ميزان دستخط هيثر ماسثر . Aar

(29) رجسر حاضرى مدرسين كورغيث وبزير نظرى سولي نديس ورزيا بابت ماه من ' 2013 ۶ Sur 2 2 نام gut of ut of عهده כצי נתו ו 0.5-H. .5 ردانتكى دسنخط وستخط دستخط ردانج آ بد وستخط آبد استخط دستخط آيد ر دانجی وستخط تاريخ وستتخط آبار ردانجي ر ج رکے 1 ر م ۲ 840 ß MA 11-2  $\varkappa_{\simeq}$ 1.00 P ٣ 8.00 11.<u>0</u>0 8.00 11-2  $\bigcirc$  $\partial$ lior, í de la .1.2 ۴ . Ŷ Bai 6- $\mathscr{P}$ 金1, ۵ :2 34. W. 1 ال 4.71 \$1 SV. l Y. R P Ò. 9.1 1.00 X'm ł <u>C :</u> Ļ P P 21 <u>ن</u>-ن-НЭ 8., 12 ٨ Pilling Ð 8.0 14.5 8.0 1:02 P 2 ٩ 243 ✐ 33 0 1+ 11 巡 sH! 14/1 5 112 12/ 11/ 11/ 11 · W:\* 11 1.00 HA Q P 10 <u>H-2</u> 8.00 Hen  $\mathfrak{X}$ . o P Ø 1 20 100 10 0 8.00 4.2 14:2 ß 1.200 als 14 P  $\mathcal{O}$ 010 Q.m 3 14 H.a Q 7:00 P 8.4 HA 3. i۸ <del>R. c.:</del> ρ Ø 3.4 1 a Hin 11 12 345 19 14 54 • \$% <u>~</u> 1 之  $\Diamond$ R 1-1-2 1+ S. a 8. .00 c. ۱ ۲1 Я. p D 1.00 11 Q <u>R.</u> R ρ A RULE عانيه Ş P Ż ) (). ٢٣  $\mathbf{\mathcal{R}}$ Δ 121112 [R.] <u> 2?</u> ٣٣ P Ð 4.51 11. ou ٢۵ P 1 -<u>ن ک</u> 5% \$ ¥. 1.1% 121 14 **بر** · · ٢2 P R.a Q.  $\rho$ 12.7 P ۲۸ 4<u>.</u>2 P 7 612.15 5-8 40 D Ø 9.00 19 112 1. 00 ļ 5 912 5 P 8.00 · Ş. ٣+ N HA  $\mathcal{T}$ . 07 i Ş H.J 11.000 11.00 P 11.00 8. a 21 2 ميران بر رخص م اميزان سالقه حال حال مابقه ميزان مالقه حال ميزان سالقه حال اتفاقيه استحقاقي بيارى ميزان بمطلله وتتخطهيذ ماسر

محکر جا صری مکر ترمین کو بیمن مرز در المری می کو نزد بر المری المریک می کو نزد بر المریک می کو المریک می کو الم بابت ماه ۱۰ ایریل محافظ المریکی محلف المریکی می کو المریکی می کو المریکی می کو المریکی کو المریکی می کو المریکی می مجر عليه تتسان عهده H·M ا آر روائجی تاريخ دستخط دستخط آر ردانگی دستخط آ کمد دستخط دستخط ردانكي وستخط وستخط ردائکی آلا I. ا دستخط ۲ 9 ٣ سند ۴ 0 ۵  $\overline{\phantom{a}}$ ۲ ۷ ٨ 14.1 ĩ H-A 102 ٩ P 8.07 9.0 1:c<u>j¢</u> 42 1+ D Q. НЭ P 11 C 8..  $\mathcal{D}$ Д · 103 H-2 11 8.00 Q 8.0 *ב* H· 1-03 È 11 2 ዋ ¢ Hia ي. 11 P 11.a <u>و.</u>نع 14.2 R 16 White 14 P 2.00 1/1/ 1.00 P 1 11 1 this 兴 ١Ô NH2 之 sil/ H·D 17 D <u>Q.cc</u> H P 1.00 n. 14 Riv R R 8.4  $1\Lambda$ 9. 8.00  $\rho$ H.a C 1:00 19  $\mathcal{O}$ Q  $\sqrt{2}$ H-2 Ria 52 H.a n 11-0 Ę ۲. A THE ص کی Ø. 11-00 Ð 10 ·W 11 长 P 2. m 151 笔 学 Q  $\cdot \omega$ 412 11 SY. SY ( 8 Ha 42 ٢٣ Q. ρ 8.00 4.2 . า .07 ۲۴ 8.4 8.4  $\mathcal{Q}$ 1.00 Q Le Le Z 10 8.40 ₽ 1-1.2 P .00 ۲٦ ₽ R 8.00 Hi <u>. n -</u> 1-1-1 <u>ZA</u> ٢4 80 Æ Q R. 02 1. 00 14.2 ۲۸ 2.0 R  $\overline{\Lambda_h}$ بميالي 0 100 <u>برن</u> 41 41/2 ; ۱ SULF 学派 23/4 ¥4, لاله) 19  $\mathcal{A} \cdot \mathfrak{A}$ 8.10 1-1-1-٣. <u>ze a</u> P Q 1.00 17-0 <u>id · )</u> Q.a. P ۳1  $\cap$ فسر دخصہ ا حال مابقه ميزان ا حال - مابقه أميزان حال سابقه ميزان: حال مايقه ميزان اتفاقيه استحقاق بيارى ميزان دستخط ہیڑ ماسٹر Adde

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3) مری مکر ترمین کو منت کر مز جرا کم می کن نیز میر مل از از من جهان داده مار مار مرابع رجيطر حاض بابت ماه مرالح تام عهده آ آند\_ دستخط ر دانگی وستتخط روانجي دستخط أآمد .T | دستخط وتتتخط روانجى ر دائی دستخط وستخط وستخط آمد تاريخ 4 24 P ll. m Æ) 8.00 2. 1 1. 02 HS 8.0 H-3 Þ P io  $\mathcal{D}_{ii}$ 8.05 ٢ <u>ىن /-/</u> 1.m ЬJ W. WE أكود 1/-Sty-3/2 1: \* St. ٣ ¢ ۴ R 9.11-۰. X.os ۵  $\mathcal{P}$ P 8.0 ۲ £ 8.07 4-5 8. a. P ۷ In H.2 8.0 1.02 E. 8.0 ۰. Ż £ P ۸ <del>.</del>?. P ר ו 8.00 9 42 Q ... No. ا کوا 1 N/S ¥ 12% 5 32 1+ 512 P P 8.00 പനം H 112 8.... 42 £ 9. P ۱۲ 1.10 8.0 1+2  $\hat{\mathcal{O}}$ 8.07 11 41 2., " Ŋ 16  $\mathcal{P}$  $Q_{\cdot}$ 1.07 P <del>Z.o</del> ۱۵ Ø 02 122 Q. • P 14  $Q \cdot A$ i1.) 8.0 V/ . 1/2 ś¥c. 14 S. МŶ. 24 SV. P ſ? 1.010 Sim I۸ ele aill P 1.0 80 19 8. ſ 1 50 ۲+ Ŷ  $2 \cdot v$ 11.2 8.00  $H_{m}$ 1.00 P ହ <u>ip</u> 2.00 11 72 P P 11 00 8.0-1 22 11.00 8.1 4.2 HO , 25 7. 14 VE (te-G, e ۶. ٢٣ 1 G. 2 با کو \* W12 044, 1. 151 ٢٣ ر 圣 1/2 X12-SHE Ń ٢۵ *S*. P P 8... 14 Р P . . m ú 12 8 P p 7.00 <u>8°a</u> ٢٨ 6.00 4.2 D 1100 2.00 12 19 Ha 4. 11 or 8.0 2 m 1.00 Ŷ ٣. 42 ۳١ حال ميزان ميزان ينايقيه . ميزان الجال سابقه بابقه رزخصت ا سابقيه طل` ميزان <u>حال</u> اتفاقيه استحقاقي ł بيارى ميزان وستخط هيثر ماسثر All

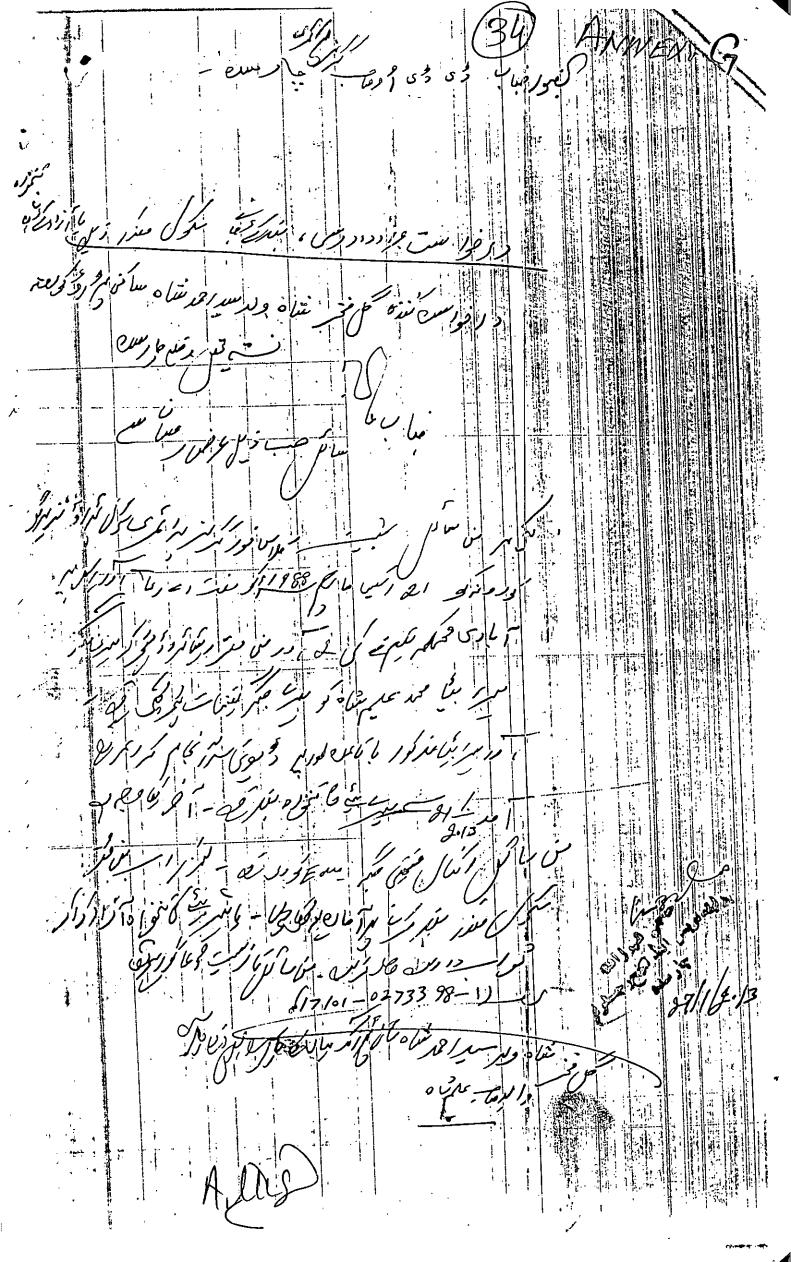
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Saber Mitte

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(3I) ارجسٹر حاضری مکر ترسیس کے رضاف کر من برا لیڈی بیکی ان نیز کی کو دینے کی ۔ بابت ماہ فررری عمدیا ہی ہی نآم 2-1-1-5 +1-17 ر تخلیرا ر ردانگی تاريخ الآمد روائگی وستخط دستخط دستخط ردائگی وستخط آمد وستخط آمد دستخط آمد إوستخط ويتتحز ردائگی 32 1 نې مخې  $\mathfrak{R}$ 1'02 11 · G 11-6 \$ 9.07 P 11-62 ۲ 7 · Q P HQ H.A tro 2:10  $\rho$ 1.02 اذه ٣ \$光  $\mathbb{O}_{2}^{K}$ 34 <u>\*</u>¥\* XW/ 1 、ど 11/2 11 ۴ H.O 8.00 Hia 1.02 P 1-00 SUZ D ۵ 1 ۲ 8.00 Ha H.D 1.1 P P 8. 02 1.00 ۷ 4) S 524 Þ in. ٨ مرد برم 17  $\mathcal{H}$  . <u>v</u>2...; P 7 ĝ 11.0  $1 \sigma_{\rm L}$ 1000 Ċ 1 N 14 + N1/ N/1 20 NY! S. S 11 Ha Real Rez. P 11 8 cm 17.3 1.02 14 .)  $\bigcirc$ 80 11 ī Þ n لتبوع 157 10 8.12 ī. ; 37. 10 deule 8.01 è 14  $\mathcal{D}$ 111 أالذو ¥11/2 14 Y1/2 à. < X4 Sh Nego. IA Ý ... <u> Z.u</u>  $\mathcal{O}$ 19 8.  $\frac{2}{c}$ P P ۴ + 6 14. 1.0  $\widehat{\mathbb{O}}$ P ۲1 ŷ. 1 8.0 p P 100 2 22  $\mathcal{S}_{2}$ 27 Ha 1.00 Est. 0 22 Q Ø. 14 - Ally 圣 1 ۲۴ 140 ۱, 54 3% 54 淡 ٢۵ 7.00 P ۲۲ QP L'S ران ۲۰ (۲۰ ۲4 2.15  $H_{\rm el}$ 40 P P 8 in 1.278 ٢٨ 5... ĹĹ., 4. g. a P here  $\mathcal{P}$ 1.00 ٢٩ + ۳ ٣١ . سر رخصه حال سابقه اميزان حال ميزان ميزان سابقه سابقيه حال حال سالقيه ميزان اتفاقيه التحقاقى بيارى ميزان ويتخط بيد ماستر

11= 33 ANNEQUE Ċ Ste ip Swip o civile 3 <u>گېزار کې چو. کې</u> 2 (1) / (1) / (1) / 1-13 21-1-12 (1) (1) (1) (1) GUL (SI a Elbo 9 Suli dy's or las 2-6 - 2 Cup of / de Satisfactory /il Bead Mistress G. P. S Noleer Gal Reteons Meally Cha 24-11-014



Just surp الحضر فيان فج مع عتر ح شرائم من من وسم طرا<sup>2</sup> ما جر شا میں د به اس نیز می فر شما هطر المرزة كولام. د - تي وزرو بر مراعد - بر وزرو بر مراعد من سر من سائل الم بني مس عد تاه مر مدش فيتال بر م مرور ال از الم الم الم برر سر موال فی میں معطیل کا میں موال محر مركار المين ب ا در سوكا منرا ر فن م معدم من مركل المرار في منتروب الدرس معدم من مركل لمال في مركب كريس ابن عن يسرمن وبعلى لحظ بالن و جيس معددر ما جد 2/ 1.13 ويور) الم عد ورم - ربا) در البن سبع المعلم تسم ٥.١٦. ورود المالي الم ار از از مرد در ما الم الم بالا معرب معن مرسح ما معز المرارون للمع 2111/2014

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WNEA "H"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA No 4271 / Date 27/05 /2014

### The District Accounts Officer

Charsadda -

# Subject:- VERIFICATION/AUTHNTICATION OF APPOINTMENTS ORDERS

Memo:

AM

To,

 $\mathcal{A}_{\mathcal{I}}$ 

Reference to your letter No. DAO/ADMN/2013-142183 dated 22-10-2013 on the subject noted above.

The concerned person Mr.-Muhammad Aleem Shah S/O Gul Fakhar Shah has been appointed as Chowkidaar at GGPS Parao Nissata Charsadda vide this office order Endstt: No. 3714-18 Dated 27-12-2012.

His appointment orders as verified and re submitted please.

Polis Avers

DISTRICT EDUCATION OFFICER (FEMALE)/CHARSADDA tomo or Khyber Pakhtnikhwa Civil Serreracia

Peshawar,

### Subject:- APPEAL FOR RELEASING THE OUTSTANDING TWO YEARS SALARIES W.E. FROM 27/12/2012 TO 15/12/2014.

It is humbly submitted that I was appointed, as chowkidar vide office order no. 3714-18 dated 27-12-2012 (Flag-A) and was posted at GGPS NIZIR GUL KOORONA PARAO DISTRICT CHARSADDA P/O NISATTA since that I am performing my duty at above mentioned School. In this regard the certificate of official duty is also attached at (flag<u>-B).</u>

It is therefore, requested that the EDO Female District Charsadda may be directedto released the salaries of the applicant which is stopped by unknown reasons.

I shall be very thankful to you and pray for your long life.

Your Most Obedient

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Muhammad Aleem Shah Chowkidar GGPS Nazir Gul Korona Moh: Parao Nissatta District Charsadda Mob: 0333-9323966

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ÍNU.

To 1

The District Education Officer (Female) Charsadda

Subject:

APPEAL FOR RELEASING THE OUT STANDING TWO YEARS SALARIES W.E.F. 27.12.2012 TO 15.12.2014.

D ited Peshawar the

Memo:

I am directed to refer to the subject noted above and to enclose herewith a letter bearing No. SOG/E&SED/1-68/2015 dated 8.1.2015 received from Section Officer (General) E&SED Khyber Pakhtunkhwa addressed to this office and copy thereof endorsed to others in r/o Mr. Muhammad Aleem Shah Chowkidar GGPS Näzir Gul Korona District Charsadda for necessary action as per rules/policy under intimation to all concerned.

> Assistant Director (Admn) Directorate of E&SE K.P. Peshawar

Endst; No.

5671-

Copy forwarded to the Section Officer (General) Govt of Khyber Pakhtunkhwa E&SED w/r to his No. referred above Mr. Muhammad Aleem Shah Chowkidar GGPS Nazir Gul Korona Moh: Parrao Nissatta District Charsadda. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

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Assistant Director (Admp) Directorate of E&SE K.P. Peshawar

Muhammad alcem shah appeal releasing salaries

Ealing in the Releasing in the stand of the and a stand of the and - E/B-1-4. 2 ( ( i) ) 2 9 ( frid ) 2 9 5 5 5 5 10 10 2 (1) Salames Releve 10 Jul screeking for a july (2) 2 min quite - 28 5 is in the lever be in the and the as white at · Equipide verification Condit. 27 12 Ends: NO. 3714-18 19-16 flinking (4 - روا بن مروا بن مروا بن مروا بن م متدم بالأقرار شات تومير متظر وتعوكم سالي في مالانه تنحل د في كالمعاماً جارى فرمانى - - الحل ومدى هم د الحق من ما 6<u>5</u> 2015 eng م معا الجدار في علمه شاه ولو في شاه توكيد حريث مراز مراغ ف فد مرض كورون على مراؤلت Mart



То

Memo:

- OFFICE OF THE DISTRICT EDUCATION OFFICER (FEBIALE) CHARSADDA (Office Phone #0919220086) Email: <u>emischarsadd.dcof@yahoo.com</u>

/Dated

ANNEN LODE

.2015

Mr Aleem Shah, Chowkidar GGPS, Nazir Gul Koroona.

No.

#### SUBJECT: <u>ABSENCE FROM DUTY</u>

As per report of SDEO(F)/ASDEO(F) concerned you have been absent from duty w.e.f 24-04-2013 till date. You are directed to explain your position that why you have been absent from duty w.e.f 24-4-2013.

Your explanation should reach to the under signed with in three (Saven) days positively otherwise strict disciplinary action will be initiated against

you you are further clineded to attend the applie of Undersigned on 20/5/15/ DISTRICT<sup>R</sup>EDUCATION OFFICER al 9:30 am. FEMALE CHARSADDA

The district Education officer SDE State Joen Female charsadad Subject :- ABSent From Duty gt is humbly Stated, that vide letter No. 2017 dt The explanation is called from the undergyneed so let Explains my position as under. (1) that the underbign is appointed as a chimited bar in Najir Chul Koroona perave, wich order No evendt 27-12-2 and till date the sames of the undersign has not yet relea the condersion is do performing his duty very well cupies of A Repolition albert F/A) and Enon a performance Certifical Thead mistores & the Grips, Min Gul Ko scone of Cat. F/ In misons of the above stated passition, my Explor it is may kindly be filed, and the letter NO. 20 aries may also be calegad monthly. be very thanking to you. 9 44 Loladin 1 03/15/11/2 200 pogles 7 Alos alignes ( Mahaimad plee chantinolar by cioco ps, Majorg Faras Myalla.

Julien fight String of . Uning all & and & Child گور نمین کر زمرانم کار مخاصر می فرد و من می او می این داری series in a subjection is 246,7(4), 2 kp Cerecos Micana (....



POWER OF ATTORN		0
In the Court of 12 PIE Service Toe	sue l	95411-
Aleem Shih		}For
		}Plaintiff }Appellant
		}Petitioner }Complainant
VERSUS		f Complaniant
CONF P/E P/E EB		Defendant
		Respondent Accused
Appeal/Revision/Suit/Application/Petition/Case No.	of	}
	Fixed for	

I/We, the undersigned, do hereby nominate and appoint

IJAZ ANWAR ADVOCATE, SUPREME COURT OF PAKISTAN

Imy true and lawful attorney, for me mm y same and on my behalf to appear at 69 \_to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employee any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND l/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

**PROVIDED** always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at

the day tothe year Executant/Executants Accepted subject to the terms regarding fee Acpun ljaz Anwar Advocate High Courts & Supreme Court of Pakistan Sajas Ar ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT FR-3 &4 Fourth Floor, Billour Plaza, Saddar Road, Peshawar Cantt Ph.091-5272154 Mobile-0333-9107225

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR Service Appeal No.997/2015

Mr. aleem shah Vs

### Govt. of Khyber Pakhtunkhwa

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### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR Service Appeal No.997/2015

### Mr. Aleem shah Vs Govt. of Khyber Pakhtunkhwa

### Written Reply on behalf of Respondents

#### **Respectfully Sheweth:**

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#### Preliminary Objections:

- A. The Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless and not maintainable, it shows no cause to be taken for adjudication, therefore the same is liable to be rejected/dismissed.
- C. That no legal right of the appellant has been violated, therefore the appellant has no right to file the instant appeal.
- D. That the appeal is wholly incompetent, misconceived & not maintainable in its present form.
- E. That the Appellant is completely estopped/precluded by his conduct to file this Appeal.
- F. That Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from mis-statements and concealments of facts and as such the Appellant is not entitled to equitable relief.
- H. That the Hon' able Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.

#### PARA WISE REPLY ON FACTS:

- 1. That the appointment order has been issued on back date , hence no record of the order is available at the office of DEO female charsadda and before the appellant numerous retired employees sons still awaited.
- 2. Incorrect No, record of the Appellant for apply of the post of class( 4), interview record and his appearance before the departmental selection committee has been found in the office of respondent No ,3 hence the contention of the Appellant is against the actual facts.
- 3. Incorrect, that the appointment order of the Appellant show that he was appointed at GGPS Nazir Gul koroona, and the other side written recorded of the ASDEO in the attendance register on page no, 19, 26, 27 of the Appeal, peon not present on gate, further when I examined the attendance of the appellant, on some pages signature were available, and on some pages just wrote (P) instead of signature which shows self made story by the Appellant.( copies of the sample of the attendance with the appeal on page No 11,12,13,14,15 & 19,20,21,22,23,24,25.

- 4. As replied above, with further clarification that enquiry into the matter has been already been conducted against the appointing authority and the issue of class 4 employees has been discuss under proper heading at page No 3 of the enquiry report (ENQUIRY REPORT IS ANNEXD A.)
- 5. As replied in above para.
- 6. AS replied in para 1,2,3,4
- 7. As replied in para 1,2.
- 8. The Appellant has got no cause of action to file instant Appeal.

#### GROUNDES.

- (A) incorrect, No vested right of the appellant is violated by the respondents , the respondents acted as per law.
- (B) Incorrect as para 4.
- (C): Incorrect, At the time of release of pay of the others appointees, appointment order of the appellant was not available at the office of the respondent No, 3. hence the appointment order has been issued on back date the order issued just one day before when power of appointment delegated by the govt to DEO femal
- (D) incorrect, as ground above.
- (E) Incorrect, No vested right 0f the Appellant is violated by the respondents, the respondents acted as per law.
- (F) Incorrect as ground C.
- (G) Incorrect, as per para 2 and 4.
- (H) Incorrect, No record of the appellant available at DEO femal office.
- (I) As per ground above.
- (J) the respondents acted as per law.
- (k) That the respondents also seek permission of this honorable tribunal to Adduce further points at the time of arguments.

IT IS THEREFORE MOST HUMBLY PRAYED THAT THE APPEAL OF THE APPELLANT MAY GRACIOUSLY BE DISMISS WITH COST IN FAVOUR OF THE RESPONDENT.

<u>Respondents:</u> 1 DISTRICT EDUCATION OFFICER (F) CHD. IRECTOR E&SE KPK

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR Service Appeal No.997/2015

### Mr Aleem shah Vs Govt. of Khyber Pakhtunkhwa

#### AFFIDAVIT

I Mr. Mudassir Shah ADEO Litigation of the DEO (F) Charsadda do hereby as per information conveyed to me by DEO (F) Office solemnly affirm and declared that the contents of para wise reply are true and correct to the best of my knowledge and nothing has been intentionally concealed from this Hon'ble Tribunal.

Deponent Mudassin Shah ADEO Litigation O/O DEO (FEMALE) 6 Charsadda CNIC: 17101-6347249-1 LDVOCATE

### REGISTERRED

#### GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the October 21, 2014

#### NOTIFICATION

NO.SO(S/M) &SED/4-17/2013/Attaullah Khan Ex-EDO; WHEREAS Ex-EDO, E&SE/ Ex-DEO Male BS-19 Charsadda (now Principal BS-19 GHSS Bogara Karak) was Mr. Attaullah Khan, proceeded against under the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2 Mr. Muhammad Humayun Khan, Chairman BS-21, Provincial AND WHEREAS Inspection Team Peshawar (now Secretary Transport Department) was appointed as inquiry officer to conduct formal inquiry against the accused officer, for the charges leveled against him in accordance

3. AND WHEREAS the Inquiry officer after having examined the charges, evidence on record and explanation of the accused officer has submitted the report.

AND WHEREAS a show cause notice was served upon Mr. Attaullah Khan, Ex-EDO, E&SE/ Ex-DEO Male BS-19 Charsadda (now Principal BS-19 GHSS Bogara Karak) dated 09-07-2014 conveyed to him on 17-07-2014.

AND WHEREAS the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after 5 having considered the charges and evidence on record, inquiry report, explanation of the accused officer in response to the show cause notice and personal hearing granted to him by Additionalit Secretary (Regulation), Establishment Department on behalf of Chief Minister Khyber Pakhtunkhwa on 26-09-2014, is of the view that the charges against the accused officer have been proved.

NOW, THEREFORE, in exercise of the powers conferred under section 14 of Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of "dismissal from service" upon Mr. Attaullah Khan, Ex-EDO, E&SE/ Ex-DEO Male BS-19 Charsadda (now Principal BS-19 GHSS)

### Endst: of Even No. & Date:

#### SECRETARY

Copy forwarded to the: -

Accountant General, Khyber Pakhtunkhwa, Peshawar, 2-

- PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar. 3-
- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. 4- District Education Officer (Male), Charsadda/ Karak.
- Mr. Attaullah Khan, Principal BS-19 GHSS Bogara Karak. 6-
- District Accounts Officer, Charsadda/ Karak. 7.
- PS to Chief Secretary Khyber Pakhtunkhwa Peshawar. S-
- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

(MUJEEB-UR∮∲EHMAN)

SECTION OFFICER (SCHOOLS/MALE)

#### **CONFIDENTIAL**

### GOVERNMENT OF KHYBER PAKHTUNKHWA TRANSPORT & MASS TRANSIT DEPARTMENT

No. PS/Secy/T&MT/KP/2014

Dated Peshawar, the 10th March, 2014

The Secretary to Govt of Khyber Pakhtunkhwa, Elementary & Secondary Education, Peshawar,

SUBJECT:-

#### - INQUIRY REGARDING IRREGULARTIES COMMITTEED IN THE APPOINMENTS OF DIFFERENT CADRES BY THE THEN DEO (E&SE), CHARSADDA

MUHAMMAD HUMAYUN INQUIRY OFFICER.

Memo:

To

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Kindly refer to the Elementary & Secondary Education Department Notification No SO(S/M) E&SE/4-17/2012/Attaullah Khan, Ex EDO, Charsadda dated 21.11.2013 on the subject cited above.

2. Inquiry Report containing 01-14 pages along with A to YYY Annexures is sent herewith for further necessary action at your end.

#### CONFIDENTIAL

### SUBJECT:- INQUIRY REGARDING IRREGULAR APPOINMENTS MADE DIFFERENT CADRES BY THE DEO (E&SE), CHARSADDA

#### INTRODUCTION

According to the Elementary & Secondary Education Department Notification No SO(S/M) E&SE/4-17/2012/Attaullah Khan, Ex EDO, Charsadda dated 21 11.2013, the Chief Minister Khyber Pakhtunkhwa was pleased to appointment the undersigned as Inquiry Officer to conduct inquiry regarding irregularities committed in the appointments in different cadres as mentioned in the Charge Sheet and submit report within one month (Annexure-A). Letter in question was received on 28.11.2013. Mr. Attaullah Khan, Ex-EDO (E&SE) Charsadda was asked through registered letter for submission of his written reply within seven days failing which it shall be presumed that he had no defense to put in & in that case ex-parte decision shall be taken (Annexure-B). The Elementary & Secondary Education Department nominated Mr. Musharraf, Superintendent (Establishment), (Schools/Male) E&SE Directorate KPK as departmental representative to assist and appear before the committee along with relevant record (Annexure-C).

#### BACKGROUND

iii)

Status Name of Officer BPS Designation S.No. Chairman GHS. Principal 19 Mr. Ahmad Jan i) Charsadda Khas Member 18 (BPS-18) Shamsur Mr. ii)

An inquiry committee comprising of the followings was constituted to conduct a fact finding inquiry and submittits report:-

On the recommendations of fact finding inquiry committee formal inquiry has been initiated.

18

#### MR. ATTAULLAH KHAN;

Rehman

Mr. Masal Khan

On the recommendations of Public Service Commission Mr. Attaullah Khan was appointed as EDO, E&SE (BPS-19) with effect from 26-1-2010 and posted as EDO (E&SE) Charsadda. He served as EDO E&SE Charsadda upto February, 2013. Presently he is working as Principal, Government High School, Bogara, District Karak. According to his date of birth he will attain the age superannuation on 17-03-2020. According to Charge Sheet he has been charged as under (Annexure-D);-

> "Made irregularities in the appointment of different categories of teachers i.e. CT (M/F) Class-IV, PST, PET, DM (M/F) AT, TT, Qari and Junior clerks during 2010 to 2013 in violation of rules, regulations and prescribed procedure."

Principal,

Mandani, Charsadda

GHS

Member

Mr. Attaullah Khan in his written reply dated 17-1-2013 stated that all the orders have been issued in accordance with rules, regulations & policy of the Provincial

#### Page 1 of 19

Government. All the codal formalities were fulfilled before filling vacancies. Screening tests were conducted through ETEA. Appointments were neither made in one go nor all alone. Selection process was completed through different committees. Appellate Committees were also constituted. On the recommendations of Appellate Committees certain appointments were reviewed. Appointments were made as laid down in the Appointment, Promotion & Transfer Rules, 1989 and instructions issued from time to time. In the selection processes following parameters were followed.

- a) Vacancies were advertised widely in line with the recruitment policy in vogue.
- b) Screening tests were conducted through ETEA.
- c) District Selection Committees were constituted as per APT Rules, 1989.
- d) Quota System reserved for promotion, disable, retired employees sons' and deceased son was followed according to the each cadre.
- e) Recommendations of DSC and Appellant Committees were given weight age to avoid unnecessary litigation.
- f) Advice from the Administrative Department was sought from time to time.
- g) The EDO does not carry cut all the appointment at his own sweet will; rather DSC & Appellate Committees were constituted. Members of the committees have not been charged.
- h) An Appellate Review Committee comprising of followings was constituted vide Endorsement No. 7625 dated 4-8-2011:-

S. No.	Name of Officer/ Official	Designation	Status	, , , ,
i)	Mr. Jehangir Khan	District Officer (M)	Chairman	
ii)	Mr. Khisro Parvez	Superintendent	Member	
iii)	Mr. Ruhul Qudus	Superintendent	Member	! ·!

The composition of the District Selection Committee notified by the Provincial Government is as under:

a) EDO (E&SE) Chairman b) Nominee of DCO Member c) One nominee of Administrative Deptt: Member d) District Officer concerned Member He prayed that he always followed rules and regulations therefore may be exonerated. His written reply is at (Annexure-E). Written statement of following officers/officials of E&SE Charsadda who remained associated in the scrutiny of documents and preparation of merit lists were obtained:-S. No. Name Designation Annexure i) Mr. Ghafar Khan District Education Officer F Charsadda ii) Mst Ulfat Begum District Officer (F) Education G I Charsadda iii) Mr. Muhammad Shoaib Principal, GHS Garhi Mameed Н

Page 2 of 19

		Gul, Charsadda	
iv)	Mst. Aqeela Naz	SDEO (F) Charsadda	1.2
v)	Mr. Jehangir Khan	ADO/DO/DDEO (M) Charsadda	J
vi)	Mr. Shahjehan	Superintendent, SDEO (F)	К
		Tangi	

#### Appointment of CT Male & Female 2010

CT (Male & Female) posts were advertised in daily 'Aaj' dated 6-03-2010 (Annexure- L). Last date for submission of applications was 25-03-2010. Number of vacancies in each category was not mentioned in the advertisement. However quota for open merit, batch wise and disable was mentioned in the advertisement. After completion of codal formalities appointment orders of Thirty eight (38) CT (Male) ten by open recruitment and twenty eight on the basis of batch wise were issued vide office order No 1774-1807/E-1 dated 1-11-2010(CT Male) (Annexure-M). Two (2) Disable (Male) candidates were appointed vide office order No 1780-86/E-1 dated 1-11-2010 (CT Male disable) (Annexure-N), Mr. Taj Muhammad was appointed against Disable Quota vide Office Order No. 7138-44 dated 11-05-2012 (Annexure-O). Mr. Muhammad Shafiq s/o Muhammad Rafiq and Mr. Muhammad Arif s/o Wasil Khan were appointed on 1-11-2010 (Annexure-P) while Mr. Taj Muhammad S/O Mian Khan on 11-5-2012 against Disable Quota. Inquiry committee was of the view that out of 38 CT (Male) posts one post falls in the share of Disable Quota. According to Accused Officer on the basis of total sanctioned posts three candidates have been appointed against quota reserved for disable persons. Mr. Taj Muhammad was appointed as PST. Subsequently he applied for the post of CT under disable quota, his disability was rejected on the basis that he had already availed the opportunity earlier. Subsequently it was noted that he had not availed disable quota earlier therefore he was appointed under disable quota.

#### CT (FEMALE)

Appointment orders of nineteen (19) CT (Females) were issued four on open merit and fifteen on the basis of batch wise vide Office Order No 1800-08/E-1 dated 1-11-2010(CT Female) (Annexure-Q). Merit list of PST female (Disable) selected candidates is at (Annexure- R). Appointment orders of disable were not provided. In case of CT Female out of 19 posts quota reserved for disabled candidates comes less than one. Two candidates have been appointed against quota reserved for disable persons. Ex-DEO Charsadda claimed that quota has been calculated on the basis of overall sanctioned posts. No irregularity has been committed. Charge not proved.

#### Class-IV EMPLOYEES

In District Charsadda Employment Exchange has not been established so far therefore EDO, (E&SE) Charsadda invited applications for the recruitment of Class-IV through newspapers. Last date for submission of applications was 15-11-2009 and 8-9-2012 respectively (Annexure-S). During 2009, thirty four (34) Class-IV were appointed (Annexure-T). Similarly during 2012 one hundred and sixty two candidates applied for the post of Class-IV. A meeting of the DSC was scheduled to be held on 01-11-2012 in the office of EDO E&SE Charsadda which was postponed due to non arrival of representative of Administrative Department. Interviews were conducted on 14-09-2012. A meeting of DSC was held on 01-11-2012 which was attended by Mr. Attaullah Khan, EDO (E&SE), Mr. Shamsur Rehman, D.O, Mr. M. Idrees, ADO and Mr. Ruhul Qudus, Superintendent. Executive District Officer (E&SE) Charsadda prepared Constituency wise merit list of candidates which is at Annexure-U. Eighty four (84) candidates were recommended for appointment in various schools as Class-IV. Class-IV employees

Page 3 of 19

have been appointed through separate appointment orders but on same date i.e. (Annexure-V). Inquiry committee was of the view that merit list and record is not available, hence their appointments can be termed as irregular. Mr. Attaullah Khan claimed that record is available. Constituency wise merit lists were prepared and produced. Majority of candidates are land donors. For the post of Class-IV no hard and fast criteria has been prescribed therefore all appointments made on the recommendations of the MPA concerned are treated as in order.

Mr. Attaullah Khan,

sogara Karak)

was

2011

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WHEREAS

#### Appointment of PSTs 2011

During checking of the record it was noticed that after completion of codal formalities appointment orders of fifty nine (52) PSTs on Union Council wise and eighty four on open merit were issued vide office order No 2622-84 dated 3-5-2011and 2532-2621 dated 3-5-2011 (Annexure-W) and (Annexure-X) respectively as per detail given below

S.No	PST	UNION COUNCIL wise Appointments 40%	Open Merit	Appointments disable Quota 02%	Total	
1	Male	59	84	4	147	
2	Female	Merit list and o	ther record no	ot available.	· · · · · · · · · · · · · · · · · · ·	

Four candidates were appointed against disable guota vide office order No 2570-73 dated 19-5-2011 (Annexure-Y). Merit list was not produced by advancing reason that record is still with Audit authorities.

- 1. Mr. Muhammad Shafiq was on the top of the merit list in the Union Council Showdag but he was ignored, despite of availability of post at Government Primary School Haider Kalay. He was appointed through a separate order No. 10626-30 dated 17-10-2011 (Annexure-Z). Ex EDO Charsadda explained that Mr. Muhammad Shafiq filed an appeal before the Appellate Committee. After considering his appeal his request was found genuine therefore he was appointed through a separate appointment order. Ex-EDO (E&SE) claimed that the vacancy at GPS Haider Kalay was not communicated in time by the DDO (Male) Tangi at the time of appointment on 03.5.2011. Since Mr. Muhammad Shafiq was appointed prior to constitution of fact finding enquiry therefore it cannot be treated as an irregularity.
- 2. According to tentative merit list Mr. Faris Khan was at top of the list. Mr. Zaheerullah was shown at serial number 2 of the merit list. In the final merit list Mr. Zaheerullah son of Abdul Wahid was awarded one mark for having few months experience. On the basis of his experience he was shown at the top of merit while Mr. Faris Khan S/o Alam Said got 2nd position. Marks awarded to Mr. Zaheerullah for having few months experience were not permissible. Marks are always awarded for having at least one year, two years and three years experience. Marks must be 2, 3 or 5 and not any other figure. Moreover experience marks are awarded after acquiring minimum qualification for the post. Appointment of Mr. Zaheerullah was in violation of rules. Mr. Attaullah Khan claimed that no irregularity has been committed in the appointment of Mr. Zaheerullah and Mr. Faris Khan at UC Kuz Bahram Dheri. They have been given their due right. Mr. Faris Khan submitted an appeal to the Secretary Elementary and Secondary Education. Subsequently Mr. Faris Khan was also appointed (Annexure-AA). Ex-DEO Charsadda had violated rules. Mr. Faris Khan got his right but on submission of appeal before Secretary E&SE. Moreover appointment of Mr. Zaheerulah is aiso irregular.

B.A/B.Sc 2<sup>nd</sup> Division alongwith two subjects Islamiyat and Arabic alongwith Shahadat-ul-Khasa from Tanzeem-ul-Wafag-ul-Madaaras

Mr. Muhammad Arshid S/O Abdul Qadar was reinstated as TT vide order No.3929-34/Appointment/TT dated 31-12-2013 (Annexure-UUU). He obtained Sanad of Qirat and Tajveed. He was not qualified for the post of Theology Teacher.

It is fact that minutes of the meeting with regard to reinstatement of sacked employees were not available. However approval of the DCO was obtained on file.

#### **OBSERVATIONS**

ii)

It was observed that Mr. Attaullah Khan Ex-EDO (E&SE) Charsadda advertised all the posts in the news papers. Scrutiny committees were constituted. Written test and typing test were conducted. ETEA test was also arranged for the posts of CT, PET, DM, TT & Qari. Interviews were held. Merit lists were prepared and displayed. Appellate committees were also notified. A number of appeals were decided by the Appellate Committee and candidates were given their due rights. However, certain irregularities have been noted in the appointment of Junior Clerks reinstatement of sacked employees, Mr. Muhammad Usman an underage candidate was appointed as Junior Clerk, typing material produced seems fake and certain other categories. In certain cases observations raised by the fact finding committee were found valid while in other cases baseless. In order to extend undue favour to undeserving candidates written test was conducted for the post of Junior Clerks. After passing typing test merit list should have been prepared on the basis of academic record and experience etc.

#### RECOMMENDATIONS

1) Charge of illegal and irregular appointments leveled against Mr. Attaullah Khan, Ex-EDO Charsadda partially proved. Eligible and qualified candidates were deprived of their due rights. Mr. Attaullah Khan, Ex-EDO (E&SE) Charsadda was appointed in BPS-19 by initial recruitment through Public Service Commission hence his reversion to lower post is not permissible. It is recommended that minor penalty of stoppage of three increments may be imposed upon him.

District Selection Committee notified by Mr. Attaullah Khan, Ex-EDO Charsadda is as under:-

	· · ·		
S.Nc	Name	Designation	
1	Mr. Attaullah Khan	Ex EDO, Charsadda	Chairman
			. I.
2	Mr Maqsood Jan,(Died)	District Accounts Officer, DCO Office Charsadda	Member '
3	Mr. Jehangir Khan	Deputy District Education Officer (M/F),E& SE Charsadda	Member
4	Mr. Khadim Shah,	Superintendent, EDO, Charsadda	Member :
	Mr. Ruhul Qudus	Superintendent (Retd), EDO, Charsadda,	 
	Mr. Khisro Parvez Mr. Shah Jehan Mr. Liaqat Qazi Sirajul Haq	Superintendent (Retd), EDO, Charsadda Superintendent, EDO (F) Tangi Assistant, EDO Charsadda Assistant, EDO Charsadda	

Members of District Selection Committee are equally responsible therefore action may also be taken against them except M/S Roohul Qudus and Khisro Parvez who had retired from service.

Class-IV Employees who were promoted out of turn as Junior Clerks may be reverted and promotions be made purely on the basis of seniority and service record of Class-IV employees. Junior Clerks appointed by initial recruitment who do not know the typing may be terminated after serving Show Cause Notices.

Mr. Muhammad Hayat PET who has been illegally reinstated in service may be served with show cause notice and his service may be terminated and Mr. Alam Zeb PET may be reinstated against the said vacancy.

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Since DCO Charsadda was appointing authority in respect of AT, TT and Qari. Moreover sacked employees were also reinstated in service with his approval therefore he may be asked to explain reasons for according approval of irregular appointments.

Mr. Shah Hussain S/O Hussan Zada was reinstated as CT teacher vide office order No. 3505-10/Appointment/CT dated 31-12-2012. Perusal of record reveals that Mr. Shah Hussain bassed professional examination of CT (General) in 1998 (Annexure-WWW) His reinstatement is not covered under the Sacked Employees Act.

Mr. Jehanzeb Khan S/O Adam Khan was reinstated as CT teacher vide office order No. 3505-10/Appointment/CT dated 31-12-2012. Perusal of record reveals that Mr. Jejanzeb Khan passed professional examination of CT (General) in 1998 (Annexure-XXX) His reinstatement is not covered under the Sacked Employees Act.

Mr. Zahid Ali S/O Muslim Khan was reinstated as AT teacher vide office order No. 3929-34/Appointment/AT dated 31-12-2012 (Annexure-YYY). His appointment order and termination order were not available in the record thus his reinstatement in service is irregular.

MUHAMMAD HUMAYUN INQUIRY OFFICER.

<u>BEFORE THE KHYBER PAKHTUNKHWA</u> <u>SERVICE TRIBUNAL PESHAWAR</u>

In the matter of Appeal No. <u>1679/2011</u>

*Aleem shah*, Chowkidar GGPS, Nazir Gul Koroona, District Charsadda. *(Appellant)* 

#### VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary (Elementary and secondary Education Department, Khyber Pakhtunkhwa, Peshawar & others. (Respondents)

### **REJOINDER ON BEHALF OF THE APPELLANT**

Respectfully submitted:

#### **ON PRELIMINARY OBJECTIONS:**

- A. Contents incorrect and misleading, the appellant has been illegally being denied salaries since his appointment hence he has got the necessary cause action and locus standi to file the instant appeal.
- B. Contents incorrect and misleading, the appeal is filed well in accordance with law, moreover the facts and grounds mentioned in the memo of the appeal fully discloses the cause of action in favour of the appellant and against the respondents.
- C. Contents incorrect and misleading, the appellant was appointed on 27.12.2012, since then he is continuously performing his duties without any fail, being a civil servant, the appellant is entitled for his monthly pay/ salaries under the Civil Servant Act, however he has been denied his salaries, thus secured and guaranteed rights have been violated.
- D. Contents incorrect and misleading, the appeal being filed well in accordance with the prescribed rules and procedure hence maintainable in its present form and circumstances.
- E. Contents incorrect and misleading no rule of estopple is applicable in the instant case.

- F. Contents incorrect and misleading, the appellant has come to the court with clean hands, moreover all facts necessary for the disposal of the appeal are brought before this Honourable Tribunal and nothing has been concealed.
- G. Contents incorrect and misleading, the appellant is a civil servant and the matter in issue pertains to his terms and conditions of service hence only this honorable Tribunal has got the jurisdiction to adjudicate upon the instant appeal.

#### ON FACTS

- 1. Contents of Para-1 of the appeal are correct, the reply submitted to the Para is incorrect, false, misleading and without any proof. The appellant was duly appointed under the retired son quota, moreover on his appointment order was duly verified vide letter dated 28.05.2014 (Annexure H) by the DEO (F) Charsadda (Respondent No.3).
- 2. Contents of Para-2 of the appeal are correct, the reply submitted to the Para is incorrect, false, misleading and without any proof. Moreover as explained above.
- 3. Contents of Para-3 of the appeal are correct, the reply submitted to the Para is incorrect, false, misleading. The appellant is duly performing his duties since his appointment and has never remained absent from duty to this effect the appellant was also issued duty performance certificate by the concerned certificate on 13.05.2015 (Annexure N).
- 4. Contents of Para-4 of the appeal are correct, the reply submitted to the Para is incorrect, false, misleading. The Inquiry annexed with the reply has nothing to do with the case of the appellant as the appellant has not been proceeded against nor, nor has any adverse recommendations made against him. Besides the appellant has no role in the appointment process, therefore in case any irregularity is committed by the respondents themselves, the appellant cannot be made to suffer for the same. The Honorable Supreme Court has also in a reported judgment laid down that for any irregularity whatsoever, if committed by the appointing department/ authority, the appointee cannot be harmed, damaged or condemned subsequently when it occurred to the department that it had itself committed some irregularities qua any appointment. 2009 SCMR page 663
- 5. Contents of Para 5 of the appeal are correct, the reply submitted to the Para is incorrect and misleading. Moreover as explained above.

- 6. Contents of Para 6 of the appeal are correct, the reply submitted to the Para is incorrect and misleading. Moreover as explained above.
- 7. Contents of Para 7 of the appeal are correct, the reply submitted to the Para is incorrect and misleading. Moreover as explained above.
- 8. Contents of Para 8 of the appeal are correct, the reply submitted to the Para is incorrect and misleading. The appellant has been denied his salary hence he has got the cause of action to file the instant appeal.

### **<u>GROUNDS</u>**

The Grounds (A to K) taken in the memo of appeal are legal and will be substantiated at the time of arguments.

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

ovpra

Appellant

Through

SAJID AMIN

### Advocate, Peshawar.

#### <u>AFFIDAVIT</u>

I do, hereby solemnly affirm and declare on oath that the contents of the above rejoinder as well as titled appeal are true and correct and nothing has been kept back or concealed from this Honouralbe Tribunal.

ov Minz

Deponent



O.P.S.S ں ایو (آر)۲۲ ايميلائمنٹ رجسٹریشن کارڈ SERVICE UNPAID جن اميد وارول کر پاس تعارف كارو (X-3) موجود نه و ان کودفتر روز گارکا نامزد کرده تصور 5-85-20 215 - 3277 ولديت ازوجت مم حمر مل ن بخدمت جنائب 1/12 شاخى كاردنمبر 5-10 2012 61 دستخط يلج HANAGER Employment Exchange تاريخ في في الم ضروري اطلاع برائ اميدوار جب آب کوطازمت مل جائز فوراً مسلکہ جوابی کارڈ پر دفتر روزگار کواطلاع کرین ۔ اس کارڈ پر ڈاک کا تکٹ لگانے کی ضرورت ہیں ۔

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

OFFICE ORDER.

Consequent upon the recommendation of the Departmental Select Muhammad Aleem Shah S/O Gul Fahar Shah is hereby appointed Committee, ar GCPS Nazir Gul Koroona , in BPS-03 (Rs, 9610-390-21310) plus us Chowkider allowances under the provision contained in the Sub Rule (2) of Rule 3 of the Khyl Pakhtunkhwa civil servant (Appointment, promotion and transfer) Rules 1989, against a vacant post in the interest of public service with immediate effect on the following terms a

<u>H 's Date of Birth is 01-01-1994 and CNIC No. 17101-4796116-3</u>

<u>Terms and Constitions:-</u>

- 1. The Appointment is made purely on temporary basis and is liable to termination any time u ith out and assigning and reason or Notice.
- 2. He should produce Health and Age certificate from the Medical Superintendent DH
- 3. He should not be handed over charge if their age is less than 18 or more than 4
- 4. If He wishes to resign from service (key shall have to submit one month prior notice c forfeit one month pay to Government.
- 5. His service will be governed as per rules.
- 6. No TA/DA is allowed.

### (MRs SOFIA TABBASUM) DISTRICT EDUCATION OFFICER, (FEMALE) CHARSADDA. /Closs-IV Apptt/ Dated Charsadda the 28/\_\_\_/2017

Endst: No. 1081 Copy forwarded to the:-

- 1. PA to Evrector , E&SE Khyber Pakhtunkhwa Peshawar.
- 2. District Accounts Officer Charsadda.
- 3. PA to District Nazim District Government Charsadda.
- 4. PA to Deputy Commissioner Charsadda. 5. Chairman Education District Charsadda.
- 6. Manager Employee Exchange Office District Charsadda. 7. – SDEO (Nemale) Charsadda.
- 6. Cashier Local Office.
- 9. Official Concerned.
- 10. Master File.

DISTRICT EDUCATION OFFICER, (FEMALE) CHARSADDA.

135909 Rupees 75 ۵۵ کر روبیه المن -: 0> uslacitular Explisitar:-منارمی مر حالم شاہ ور مر مج محمر شاہ سکند شراق دورہ لنہ م کام داخراد کر کے تکھودیتا ہوں - بر کہ من کام کو جرکہ ایجو لیش سے انك محد آ در الغ نور المراج في المرجم الما المحد حادي مواقعا -مسرمن اللي ي مديدتى مى المراعام دى مى لىكن ور آ در لو س) اور حلى فكل تما - بور من الم الم الم علم اليو كيتون م الح مال فور مريش آ در لومري معمول مريا بروا . شر مطادقا ا کھ ڈلولی مراجام دیتے کا باخذ موگا ۔ من امرا \_ نامہ بابیٹ ند کی آڈنیسنڈ تر مراج - مراغ الم 17 1701-6029807.5-2010-6029807.5-2010-10151 2010-10151 2010-10151 2010-10151 2010-10151 2010-10151 2010-10151 2010-21796116-3 2010-2010 2010-2010 2010-2010 2010-2010 2010-2010 20 فحمد كم شرا ب المرائد لنته Rijat

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Office of the executive district officer E&SE Charsadda.

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		Sultan Muhammad	Charsadda	
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	Alamgir Khan	Din Muhammad	Dheri Palosa	
	Magsood Jan	Shaukat Jamal	Nisetta	
	, Attaullah	Amanullah	Charsadda	
	Khan Badshah	Ihsanud Din	Charsadda	
	Junaid Khan 🗸	Amanul Mulk	Nisatta	
15	Saddam Hussain 🗸	Shah Zaman	Charsadda	
	Shah Saud 🧹 🛶	Tashrif Gul	Prang	
17	Abdul Rameen 🗸	Yar Muhammad	Maira Nisatta	
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20	Asrid Khan	Umra Khan	Charsadda	····
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40 2	Tauseef Ahmad 🗸	Hamayun	Anwar Killi Ghazgi	19
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With Murit Bochen Officer (Schoold) Bochen Department Einil Sector

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58 Koinaoz Raja	Shah Johan	Abdul Akbar Koroona	19
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60 Naeem Jana	Zarfaroza	Umarzai	19
61 Saeedullah	Fazli Rahim	Shodga	19
62 fiuhammad Ayaz v	Amir Badshah	Dara Killi Mandani	20
63 Saind Shah	Usman Khan	Hisara Gui Shah	20
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68 Wakil Ahmad 🛛 🏏	Multan Muhammad		20
69 Sher Alam	Muhammad Shah i	Ajoon Killi	20
10 Asif Jehan	Azmat Khan	Janobi	20
71 Inuhammad Shafiq	Muhammad Raziq	Head Depo Killi	20
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73 Muhammad Saeed V	Liagat Ali	Pirano Killi Tangi	20
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17 Shahbar Ahmad	Bashir Ahmad	Charsadad	20
76 Hilemat Shah	Lal Hussain	Sheibh Kili Mian Isa	21
79 Rahmust Shah	Lal Hussain	Sheibh Kili Mian Isa	22
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Bection Officer (Schoold) Education Deputation

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#### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

#### <u>No 2748 /ST</u>

#### Dated 26 / 12 / 2017

То

The District Education Officer (Female), Government of Khyber Pahtunkhwa, Charsadda.

Subject: JUDGEMENT/ ORDER IN APPEAL NO. 997/15, MR.ALEEM SHAH AND ONE OTHERS.

I am directed to forward herewith a certified copy of Judgment/order dated 14/12/2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGIST KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.