

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 9.3.2015 which was not responded and hence the instant service appeal on 8.7.2015.

That the appellant was given no opportunity of hearing nor the inquiry was conducted in the prescribed manners and major penalty in the shape of dismissal from service was passed which penalty is against facts and law.

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 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed.

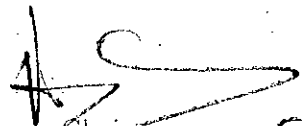
  
Chairman  
Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Representative submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant has been reinstated in service.

In the light of the said application, learned counsel for the appellant requested for withdrawal of the appeal as the grievances of the appellant have been redressed.

Dismissed as withdrawn. File be consigned to the record room.

  
Chairman  
Camp Court A/Abad  
20/10/15

ANNOUNCED  
20.10.2015



Appellant Deposited  
Security & Process Fee



Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 779/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08.07.2015	<p>The appeal of Mst. Aisha Bano presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Appeal No. 789/2015

**P.W.F. Province**  
**Service Tribunal**

Diary No. 792

Dated 8-7-2015

Aisha Bano D/O Shahzada R/O M.M Pole Mansehra (GGHSS  
Baffa)

.....Appellant

**VERSUS**

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**INEX**

S.No	Prescription of Document	Annexure	page
1	<u>Appeal</u>		<u>1-10</u>
2	Copy of Advertisement	"A"	<u>11</u>
3	Copies of Documents/testimonial are annexed	"B"	<u>12-20</u>
4	Copy of appointment order and corrigendum	"C"	<u>21-22</u>
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	<u>23-26</u>
6	Copy of impugned dismissal order of appellant	"E"	<u>27</u>
7	Copy of departmental appeal /representation	"F"	<u>28-29</u>
8	Copy of merit list	"G"	<u>30-31</u>
9	Wakalatnama		

Dated: -----/2015

  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**

**Advocate, High Court**

**Abbottabad**

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE  
TRIBUNAL, PESHAWAR.**

Appeal no. 779/15 ①

**S.W.F. Province  
Service Tribunal**

Diary No. 792

Dated 8/7/2015

Aisha Bano D/O Shahzada R/O M.M Pole Mansehra (GGHSS  
Baffa)

.....Appellant

**VERSUS**

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**SERVICE APPEAL.**

**Service Appeal u/s 4 of KPK Service  
Tribunal, 1974**

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8/7/15

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is as under:-

1. That, respondent No 3 announced the posts of Qaria in Dailly "The Aaj" dated 20/5/2011 for appointment of Qaria. The Appellant fulfills the entire criteria which sine qou non for appointment for the post of Qaria. Copy of Advertisement is annexed as Annexure "A"

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2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, Hifz, tajweed, teaching of tajweed, Shahadat ul Almia from registered Institution/ Maddaris. Copies of Documents/testimonial are annexed as Annexure "B"
3. That, following this, the appellant was appointed as Qaria in respondents' Department on the basis of merits and was posted in GGHS Afzal abad vide appointment order endrst No 893/942/ ESTT Qaria (F) APPTT; (f) 2012 Dated 16/6/2012. Copy of appointment order and corrigendum is annexed as Annexure "C".
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 16.6.2012 onwards.
5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1636-45/AE-J/ESTB on 3.3.2015.
6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi DEO, Shamim Akhtar was found attached with the show cause notice, wherein it

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was mentioned against the name of appellant that "No relevant, sannad for appointment and the appointment is not valid and is against the recruitment policy". Copy of Show cause notice and one page of inquiry of the then EDO is annexed as Annexure "D". AS the inquiry committee did recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of Qaria and appeared in ETTA Test vide Roll No 454 dated 22.6.2011 and was placed at S. No 9 of the merits list and thereafter was appointed on merit. Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their sannads of Hifz and tajweed from registered institutions are to be appointed "as per service structure in prescribe rules the sannad of Qirat from a recognized Institution meant a certificate obtained from Maddaris/Intuition Registered by the Govt. of KPK.
8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi

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required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1726-35/AE-1/Estb dated 3.3.2015. Copy of impugned dismissal order of appellant is attached as annexure "E".

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 10.3.2015. Copy of departmental appeal /representation is attached as annexure "F" but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

### **GROUND**

- a. That, the appellant fulfilled the criteria of appointment as Qaria being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed at S.No 10 of the merit list. Copy of merit list is attached as Annexure "G". Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

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- b. That, as per educational record annexed with the appeal, the appellant has been appointed as Qaria according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that no institution/madaris of female is not recognized in KPK since 1969 onwards. Therefore Qarias were appointed in Education Department prior to 2012 on the basis of sannads similar to that of appellant. Therefore if hundreds of female Qarias are serving in Educational Department on the basis of similar sannads then the appellant is also entitled to serve the department as per law. Hence impugned dismissal order is liable to be set aside.
- c. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as Qaria . But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- d. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an



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employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore, respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in future as well. Hence impugned dismissal order is liable to be set aside.

- e. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.
- f. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- g. That, right from the appointment of the appellant as Qaria in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- h. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of

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removal of Umar Kundi from service, the appellant cannot be dismissed for the acts committed by the ex-EDO.


- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribed period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order endrst. No 1636-45/AE-1/Estb dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc. Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 7/7/2015

  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

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**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Aisha Bano D/O Shahzada R/O M.M Pole Mansehra (GGHSS  
Baffa)

.....Appellant

**VERSUS**

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**APPLICATION FOR SUSPENSION**  
**OF IMPUGNED ORDER NO <sup>215</sup>~~215~~ AND**  
**GRANT OF STATUS QUO TILL**  
**FINAL DISPOSAL OF THE MAIN**  
**APPEAL.**

Respectfully Sheweth,

1. That the instant service appeal is being filed today and this application may be treated as part and partial of the service appeal.
2. That, competent authority i.e District Education Officer (Male) Masehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued
3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the

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applicant has not been contested by any one as there was no contesting rival candidate.


5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

It is, therefore, very humbly prayed that on acceptance of the instant application, impugned termination order dated 03.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: 7/5/2015

  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

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**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Aisha Bano D/O Shahzada R/O M.M Pole Mansehra (GGHSS  
Baffa)

.....Appellant

**VERSUS**

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**AFFIDAVIT**

I, Aisha Bano D/O Shahzada R/O M.M Pole Mansehra (GGHSS Baffa) do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 7/7 /2015

  
Deponent

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دوستانہ اطلاع

محکمہ ایشیائی ایجوکیشنل سروسز کے زیر انتظام (سرحد، وزیرستان، گلگت بلتستان) میں درج ذیل آسامیاں پر کرنے کیلئے نئے طلبہ کے سیکولر امیدواران سے تیز و ٹھکانہ فارم اور ایف اے (ETEA) فارم پُر کرنا جس میں مطلوبہ حدود قبول تعلیمی اسنادہ شامی کا درجہ اور سال، سرٹیفکیٹ، میٹر مورخہ 06-06-2011 تک دہرائی کا درجہ اور سال اور تعلیمی کے دستخط جانی چاہئیں۔ یاد رہے کہ عمل اور سرورسز کے لئے فارم پُر کرنے کے بعد موصول ہونے والی درخواستوں پر نوٹس کیا جائے گا۔

Table with 7 columns: Serial No., Exam Name, Date, Seats, Details, and Remarks. It lists various exams like GHS No.2 Manshra, Aina, and others with their respective dates and seat numbers.

عمومی مشورہ: (1) تمام تقرریاں حکومت خیبر پختونخوا کے درجہ ذیل کے ایجنٹس اور رجسٹری سے کی جائیں گی۔ (2) ماہ سرحدی ملازمین اپنی کٹنگ کی دستخط سے درج ذیل کے ایجنٹس سے درخواست کریں۔ (3) ایجنٹس کے پاس (Standing Member Board) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (4) ایجنٹس کے پاس سرحدی ایجنٹس کے پاس (Age Relaxation) کے فارم پُر کرنے کی اجازت ہے۔ (5) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (6) تقرری کے لئے سرحدی امیدواروں کی اسناد و دستخط اور اس سے تصدیق کرائی جائے گی۔ (7) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (8) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (9) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (10) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (11) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (12) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (13) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (14) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔ (15) ایجنٹس کے پاس (ETEA) کے فارم پُر کرنے کے لئے ایک روزہ کارڈ اور دستخط کی اجازت ہے۔

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بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# شہادت نامہ

## الثانویۃ العامیۃ

فی البیت المقدس



الحمد لله رب العالمین . والصلاة والسلام على خاتم الانبیاء والمرسلین ، وعلى اله وصحبه اجمعین . اما بعد ، فإن رئاسة وفاق المدارس العربیۃ پاکستان ، تشهد بان الطالبہ عائشہ بانو بنت شہزادہ ..... من مافسہرہ ..... المولودہ فی عام ..... ۱۹۹۶ م . قد اتمت دراستہ الثانویۃ العامیۃ فی دارالعلوم ام لیلۃ الاسلام لبرکوت مافسہرہ ونجحت فی الامتحان النہائی المنعقد تحت اشراف وفاق المدارس العربیۃ پاکستان فی شعبان ۱۴۲۵ ھ بتقدیر جمید جدا ..... وبتناء علی ذلک استحققت الشهادة ورئيس الوفاق اذینحما هذه الشهادة یوصیها بتقوی الله تعالی ویسأل الله عزوجل ان یسلك بها سبیل العالیات العالیات .

رقم التسجيل ..... ۹۵۷۴۸  
 رقم الجلوس ..... ۱۲۵۰۵۳  
 الذبجات / ۱۰ ..... ۴۶۷

محل الإصدار: دارالعلوم وفاق المدارس العربیۃ پاکستان  
 الشاریح: ۱۰، ۲۵، ۲۵، ۲۵، ۲۵، ۲۵، ۲۰



Principal Manshehra  
 Manshehra

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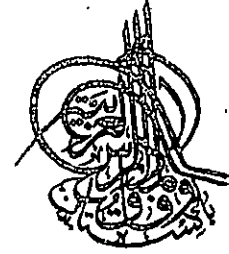
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بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



# شهادة

## الثانوية الخاصة



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

الحمد لله رب العالمين، والصلاة والسلام على خاتم الأنبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة  
وفاق المدارس العربية بباكستان، تشهد بأن الطالبة عائشه بانو بنت شهرزاده من مانسهره  
المولودة في عام 1990م. قد أتمت دراسة الثانوية الخاصة في جامعه عمر بن خطاب للنيات ونجحت في الامتحان النهائي المنعقد  
تحت إشراف وفاق المدارس العربية بباكستان في شعبان 1426هـ بتقدير جيد جداً وبسبب ذلك استحققت الشهادة  
ورئيس الوفاق إذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل القانتات العاملات،



مدير المدرسة /  
محمد شفيق

مدير المدرسة /  
محمد شفيق

مدير المدرسة /  
محمد شفيق

محمد شفيق خان

Principal  
Govt. (Boys) Mansehra  
School

رقم التسجيل 1425-05-013553

رقم البرانس 9563

الدرجات 400

محل الإصدار (المنطقة) مانسهره

التاريخ 17-9-1426 هـ  
18-10-2005 ع



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

(15)



وفاق المدارس العربیة  
پاکستان

# کشف الدرجات

امتحان شہادۃ الثانیۃ الخاصۃ فی العلوم الإسلامیۃ والعربیۃ (ایک)

ع ۱۴ ۲۶ (لکھنات) ۲۰۰۵

رقم التسجيل 1425-05-013553

9563

رقم الجلوس

شہزادہ

اسم التوالد

عائشہ بانو

1990

تاریخ الميلاد

ماہنامہ

مانسہرہ

اسم الجامعة / المدرسة جامعہ عمرین خطاب للبنات

ثابتہ اعظم روڈ مگرا مینہ نمبر شکماری

08-04-01533

الذکرات	المکاتبة	الذکرات	المکاتبة
60	اصول الفقه	56	التفسیر
90	النحو	67	الحديث
67	الادب العربي والتاريخ	60	الفقه

الدرجة الضميمة 8- الدرجة الكبرى 100- مجموع الدرجات 600- الدرجات المستقلة 400

شہادۃ ائادۃ وفاق المدارس العربیۃ ان الطالبة المذكورة احلہ قد نجحت فی امتحان الشہادۃ الثانیۃ الخاصۃ

بتقدير جيد جدا..... وصلى الله على سيدنا محمد وآله وصحبه وسلم

ترقیع مراقب الامتحان



المكتب الرئیس ہفتانہ

التاريخ 18.10.2005

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Verified on 28/3/2017

يٰۤاَيُّهَا الَّذِيْنَ اٰتٰنَا الْكِتٰبَ بَرَكَاتٍ مَّا اُنزِلَ اِلَيْكَ مِنْ رَبِّكَ فَاَنْ لَّمْ تَفْعَلْ فَمَا بَلَّغْتَ رِسَالَتَهُ وَالَّذِيْنَ  
اٰتٰنَا الْكِتٰبَ مِنْ قَبْلِكَ لَدُنَّا اَنْتَ اَكْبَرُ لِكُنَّا نَكْفُرُ بِكَ كَمَا كُنَّا نَكْفُرُ بِالَّذِيْنَ اٰتٰنَا الْكِتٰبَ مِنْ قَبْلِكَ  
لَدُنَّا اَنْتَ اَكْبَرُ لِكُنَّا نَكْفُرُ بِكَ كَمَا كُنَّا نَكْفُرُ بِالَّذِيْنَ اٰتٰنَا الْكِتٰبَ مِنْ قَبْلِكَ لَدُنَّا اَنْتَ اَكْبَرُ



# جمعیۃ تسلیم القرآن



5013276  
5080276

تاریخ اجراء ۲۰۰۷-۱۰-۱۰

## سندبرائے معلمین و معلمات قرآن حکیمہ

اللّٰهُمَّ اِنِّیْ اَسْئَلُکَ الْعِلْمَ وَالْحِلْمَ وَالْحَمْدَ وَالْحَقَّ وَالْحَقِیْقَۃَ وَالْحَقِیْقَۃَ الْعِلْمِ وَالْحَقِیْقَۃَ الْعِلْمِ وَالْحَقِیْقَۃَ الْعِلْمِ

تشہید بان محترم / محترمہ ..... عا. الشہداء بان  
ابن / بنت / زوجہ / زوجہ .....  
محمد / محمدہ / صلحہ .....  
قد حصل التریبۃ التدریس مع السبورة فی المعهد  
التدریسی جامعہ الصالحات بلینابال ایس ایس ایس ماہیہ  
من التاریخ ..... ۱۷ ستمبر .....  
وفاز فی الاختبار الذی عقدتہ بأشراف جمعیت تعلیم القرآن پاکستان  
فی ..... اکتوبر .....  
بتقدیر جمعیتان ..... وعدہ درجاتہ .....  
یہاں عقب التریبۃ القاعدۃ والتصحیح المخارج  
على السبورة لتدریس  
وہنل اللہ عزوجل ان یشاک بہ سبیل التدریس القرآن  
مع المخارج الصحیحہ، قرآن مجید

تشہید بان محترم / محترمہ ..... عا. الشہداء بان  
ابن / بنت / زوجہ / زوجہ .....  
محمد / محمدہ / صلحہ .....  
قد حصل التریبۃ التدریس مع السبورة فی المعهد  
التدریسی جامعہ الصالحات بلینابال ایس ایس ایس ماہیہ  
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مع المخارج الصحیحہ، قرآن مجید



Government Model School (Boys) Mansehra  
سندبرائے معلمین و معلمات قرآن حکیمہ

رجنل آفس ٹرسٹ جمعیت تعلیم القرآن

A-4 سوسائٹی بلازہ کینال بینک روڈ نزد میٹرو ٹاؤن لاہور

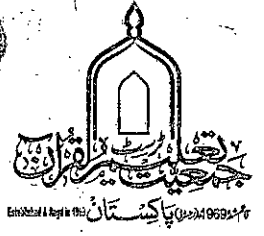
فون: 0423-5961830/0423-5961730

0423-7499008

Email: jt@lahore@hotmail.com

ٹرسٹ جمعیت تعلیم القرآن

لاہور رجنل آفس بلازہ کینال بینک روڈ نزد میٹرو ٹاؤن لاہور



تاریخ: 12-11-2014

حوالہ نمبر: ایم ایف اجزل 126 کورس فائنل (1179/D) 2014ء

17

## تصدیق نامہ

تصدیق کی جاتی ہے کہ مسماۃ صبا نور دختر شیخ نور الہی نے ٹرسٹ جمعیت تعلیم القرآن کے تحت جامعہ صالحات ڈب نمبر 1 مانسہرہ میں جمعیت کا 35 روزہ کورس برائے تربیت معلمات پاس کیا ہے۔ جس کا سند نمبر 3089 ہے۔  
نیز ادارہ کار رجسٹریشن نمبر 2586 ہے۔ جو کہ گورنمنٹ آف پاکستان سے 1969ء سے رجسٹرڈ ہے۔

طالب دعا

راوی  
پروفیسر راوشوکت علی  
ایڈیشنل سیکرٹری

Trust Jamiat Taleem-ul-Quran

Muhammad Ahsan Khan Anoli  
Advocate  
Dist: Court Abbottabad

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ مُحَمَّدٌ عَلَى رَسُولِهِ الْكَرِيمِ

(۱۸)

سَدَّدْ نَسَبَكَ

# فَتَقَدَّرَ بِرَبِّهِ الْفَقْرُ وَالْبَيْتُ الْمَعِينُ فِي سَبْعِ سَلَامَاتٍ

الْوَأَقَةُ حِكْمَةٌ بِرُوحِ مَا تَسْمُو بِكَ كَتَبْنَا

بَاهِتًا مَجْمُوعَتِ الْمَشَاهِدَاتِ بِنَا كَتَبْنَا

اللَّهُ إِيَّاكَ كُنَّا وَفَطْمَحُوهُ وَمَحْدَا وَالدُّرُوفُ الصَّلَاةُ عَلَيْكَ إِنَّا كَلَّ بِحُظَاةِ اللَّهِ أَنْشَأَ  
الْحَمْدُ لَدُنَّ أَبَدٍ مَعْدِنَا فَاذْ وَذَادُ الْوَالِدَةُ وَالسَّلَامَةُ مِنْ فَضْلِكَ وَعَلَى وَاصْفَا

الْعَدَا

لَمَّهَتْ مَعَهُ مِنَ الْفَقْرِ وَالْعَوْرُ هَلْدَ أَنْ حُظْمَةً  
الْمِتَادُ بَاذِ الدَّخْمَانِ وَهَ جَابِرِ الْقِوَّةِ

بِنَا أَنْحَنَّا فِي لَدُنَّا عَالَ شِبَانُو بِنَيْتِ شَهْرِي

الْمُنْتَوِي مَوْنِكُنْ مَحْيِي رِوَلٍ مَضَابَاتِ مَا تَسْمُو

خَلَّتْ نَسْأَةُ الْعُلَمَاءِ الْفَقْرُ وَالْحَمْدُ الْخَيْرُ شَجَرًا عَطْنَا الْوَرَقَةَ عِنْدَهَا  
ذَنْ مَدْرَا لِنَبَاتِ الْأَمْ حَفْظَاتِ الْأَمْ وَصَبَّطَتْ لَنَا مَعْ نَحْسَاتِ نَاهَا هَلْدَةَ لَتَلُونُ

وَبُرْجُوَاتِ الْعَرْشِ هَذَا الْعَظِيمِ إِنَّا أَنْشَأْنَا فِيهَا لَنَا لِنَبَاتِ بِنَهَا لِنَبَاتِ الْوَالِدَةُ وَالسَّلَامَةُ

الْإِحْلَاقِ بِبَيْتَاءِ ضَنَا اللَّهُ تَابِئَهُ فَضَالَئُ كُرْمِ أَعْوَابِ الْعَيْبَةِ وَالْإِدْعَاةُ الْوَالِدَةُ وَالسَّلَامَةُ

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ مُحَمَّدٌ عَلَى رَسُولِهِ الْكَرِيمِ  
لَقَدْ خَلَقْنَا الْإِنسَانَ عَلَى خَلْقِهِ وَاللَّهُ جَمِيلٌ  
سُبْحَانَ الَّذِي فِي يَدَيْهِ الْمَقَادِيرُ  
بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ مُحَمَّدٌ عَلَى رَسُولِهِ الْكَرِيمِ  
لَقَدْ خَلَقْنَا الْإِنسَانَ عَلَى خَلْقِهِ وَاللَّهُ جَمِيلٌ

مَدْرَسَةُ الْأَسْلَامِ  
بِوَسْطِ جَامِعَةِ الْأَصْلَامِيَّةِ  
نُورُ الْأِسْلَامِ لِنَهْضَةِ الْمُسْلِمِينَ - 20  
چابڪو به روزي ماهنامه  
الْحَقِّ اعْطَا السَّنَدَ

شَهَادَةُ اسْتِثْنَاءٍ  
شَهَادَةُ مَهْمُومَةٍ  
مَدْرَسَةُ هَيْدَرَاةٍ

شَهَادَةُ اِعْتِنَاءٍ  
المستعملات  
جميعت كستنا

M.A. Aslam  
Dist. ...

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ بِحَيْدِهِ وَنُصَلِّي عَلَى رَسُولِهِ الْبَكْرِيمِ

(19)

سنداً نمبر ۷۵-۱

# سند صلی اللہ علیہ وسلم فی التبت

الواقعة - حکایہ خود مشہورہ - بکرتا

تأمتما جمعیت المسلمات پاکستان

الحمد لله الذي جعل كتابه نوراً وهدى ورحمةً وبرهاناً، وادان به الصلوة والسلام من أجله فضل به و...

فإن اختارنا في الدين عائلته بالقرآن... ما بقية

المتروكته - ولكن مجيى پول من مضات - مشهوره - دخلت مدرسه

التبت بقوله صلى الله عليه وسلم في التبت... الجملة ونسبها عن النبي صلى الله عليه وسلم

عندنا وترجو آت قد في الظلمة اناء ليل فانه لا تقبل فيه الجند... التبت

وسترت الاخلاص في مرضا ولا في عنون الذي قال: انما اجيب ادع...

فليس تجيبوا اني رسول الله صلى الله عليه وسلم في التبت... اجيبين

مدرسه تعليم القرآن لنبات المسلمين... بهله امير خات چکيه روئے مکتوبه

مدرسه تعليم القرآن لنبات المسلمين... بهله امير خات چکيه روئے مکتوبه

مدرسه تعليم القرآن لنبات المسلمين... بهله امير خات چکيه روئے مکتوبه

مدرسه تعليم القرآن لنبات المسلمين... بهله امير خات چکيه روئے مکتوبه

مدرسه تعليم القرآن لنبات المسلمين... بهله امير خات چکيه روئے مکتوبه

مدرسه تعليم القرآن لنبات المسلمين... بهله امير خات چکيه روئے مکتوبه

Add Subjects

ADA No. 0136149

Roll No. 75559

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



12

Abbottabad Khyber Pakhtunkhwa Pakistan  
HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE  
SESSION / ANNUAL 2010

Humanities Group

This is to certify that AISHA BANO  
Son of SHAHZADA

A candidate from MANSEHRA DISTRICT  
has passed the Higher Secondary School Certificate Examination of the Board of  
Intermediate and Secondary Education, Abbottabad held in April/May 2010 as a  
Private Candidate. He has obtained 232 marks out of 450.  
The Examination was taken as a Whole/In Parts and the candidate passed in the  
following subjects:

1. ENGLISH

2. URDU

3. PAK STUDIES

PRINCIPAL  
Govt. Central Model  
School (Boys) Mansehra

Asstt. Secretary

This certificate is issued without alteration or erasure.

Secretary

(21)

## Annex C

### OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

#### ORDER

As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following **Qaria teachers (Female)** against vacant posts mentioned against each in **BPS-9 @ Rs.6200-330-17600 pm** plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

S#	Name	Father Name	Address	Place of Posting	Remarks
1	BIBI BUSHRA	FIDA HUSSAN	MANGLOOR	GGHS HASSA	AV/Post
2	SHAZIA	M AFZAL KHAN	BANDA GESUCH	GGHS JABORI	AV/Post
3	FATIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DOGA	AV/Post
4	FARHAT BIBI	M.HAMAYUN	DHODIAL	GGHS DYARYAL	AV/Post
5	MANAZZA	MOHD HAMYUN	TRANGRI BALA	GGHS MURAD PUR	AV/Post
6	MADHIA BIBI	ALI KHAN	AFZALABAD	GGHS AFZAL ABAD	AV/Post
7	BIBI SAEEDA SALAMA	FIDA HUSAIN	MANGLOOR	GGHS THATHI KHURD	AV/Post
8	ASMAT BIBI	ABDUL REHMAN	LASSAN NAWAB	GGHSS LASSAN NAWAB	AV/Post
9	BIBI MARIUM	FIDA HUSSAIN	MANGLOOR	GGHS PAIRAN	AV/Post
10	SAMMIYA RAHIEM	RAHIM SHAH	OGHI MANSEHRA	GGHS Oghi	AV/Post
11	SAIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DANDA KHOLIAN	AV/Post
12	ALYIA BIBI	ALI KHAN	AFZALABAD	GGHS SANGAR	AV/Post
13	AYSHA KANWAL	KHALIL UR REHMAN	LABARKOT	GGHS MAIRA AMJID ALI	AV/Post
14	AMBER ZEB	ALAM ZEB	PHULRA	GGHS PHULRA	AV/Post
15	AISHA BANO	SHAHZADA	M.M.POLE MANSEHRA	GGHSS BAFFA	AV/Post
16	BUSHRA BIBI	LAL KHAN	PHULRA	GGHS SAWAN MAIRA	AV/Post
17	MAMOONA WAJID	WAHJID	BHERKUND	GGHS GHANOOOL	AV/Post
18	HAMEEDA	MOHD YOUSAF	PHULRA	GGHS JARED	AV/Post
19	TABSUM	MOHD NAZIR	OGHI MANSEHRA	GGHS TRAWRA	AV/Post
20	SABA NOOR	SHEIKH NOOR ELLAHI	MANSEHRA	GGHS TALHATA	AV/Post
21	ASMA NAZ	RAJA MANZOOR HUSSAIN	BEHALI	GGHS MOHAYIAN	AV/Post

**Note:** The pay of the candidates, falls at S# 1, 8, 16 & 20 will be effective from 01/09/2012 after the re-opening of summer vacations Zone Schools

#### TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.

In case they failed to assume the charge of their posts within 15 days of their appointment, candidature-ship will be stand automatically cancelled.

Muhammad Asad Khan Tanoli  
Advocate  
Distt: District Mansehra

AA

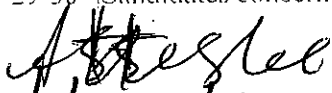
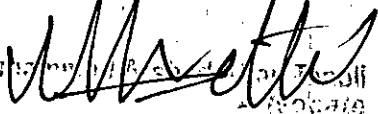


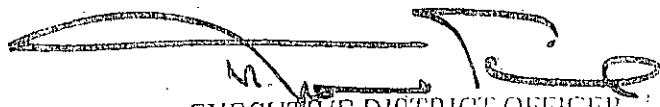
4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. They will submit to this office, their all testimonial/Registration copy of their Madrasa (Institutions), along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the (a) receipt of verified documents by the appointing authority / (EDO E&SE Mansehra) (b) duly attested & verified registration copy of the concerned Dini Madrasa (Institutions), where he/she has obtained his/her Sanad/Certificate.
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice. Their one month pay/allowances if any shall be forfeited to Government Treasury.
9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
10. They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
11. They may not be handed over the charge if their age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1<sup>st</sup> July 2001 in pervious post, their entitled for pension / gratuity etc.
13. No. TA/DA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

**(Umar Khan Kundi)**  
EXECUTIVE DISTRICT OFFICER  
E&S EDU: MANSEHRA

Endst: No 893-942 / Estt: (F)Apptt: Qaria (F)/2012 Dated Mansehra the 16/6 2012  
Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-26. Principal/Headmistresses School concerned.
27. PA to District Coordination Officer, Mansehra.
28. Budget & Accounts Officer, local office, Mansehra.
- 29-50. Candidates concerned.

  
  
Distt: Courts Abbottabad

  
EXECUTIVE DISTRICT OFFICER  
E&S MANSEHRA





P. 23  
Anner D

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7741 / DEO/ 2014

Email: deofmansehra@yahoo.com

Dated: 29/9/ / 2014

Phone & Fax: 0997-302518

To

Head Mistress,  
Govt. Girls High School

Subject:

Balqa.

SHOW CAUSE NOTICE

Memo:

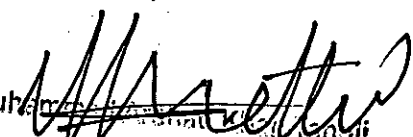
Show Cause notice in respect of Mst Aisha Bano Qaria D/O  
Shazade. of your school is attached herewith. You are  
directed to serve the same to the teacher concerned and return one copy to this  
office as a token of receipt.

  
DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

Endst:No. \_\_\_\_\_

Copy to the:-

1. Deputy Commissioner, Mansehra.
2. District Monitoring Unit Mansehra.
3. Sub Divisional Education Officer (Female) Mansehra.
4. ADEO Circle concerned is directed to ensure the attendance by the concerned teacher.

Attested  
  
Muharram Ali  
Advocate  
Distt: Courts Abbottabad

DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.



24

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA**

No. 7741 / Establishment/ 2014

Email: deofmansehra@yahoo.com

Dated: 29/9/ / 2014

Phone & Fax: 0997-302518

**SHOW CAUSE NOTICE**

I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) rules, 2011, do hereby serve you Mst Aisha Bano D/O Shazada Qaria, Govt: Girls High School Baffa Mansehra, Show cause Notice as follows:

1) You were appointed as **Qaria** at GGHS-Baffa, vide defunct Executive District Officer (E&SE) Mansehra Endstt: No 893-942/Estt Qaria (f)/2012 Dated 16.06.2012 where you were strangerfor recruitment process initiated through EATA: Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet well& wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.

2) Going through the finding and recommendation of the inquiry committee, the material on record & other connected papers including your defiance before the inquiry committee:-

I am satisfied that you have committed the following acts/Omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- b) Inflected huge financial losses to the Govt: Treasury receiving pay are result of bogus appointment.
- c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for un lawful appointment with coordination of then EDO.
- 3) As a result thereof, I as competent authority have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- 4) You, are thereof, required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.
- 5) If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-party action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

*Mst Aisha Bano*

*Mst Aisha Bano*  
Mst Aisha Bano  
D/O Shazada Qaria  
Govt: Girls High School Baffa Mansehra

COMPETENT AUTHORITY

*Naghmana Sardar*

District Education Officer  
(Female) Mansehra

B

To

The District Education Officer,  
(Female) Mansehra.

25

Mubarrat Arshad Kivan Tanofi  
Advocate  
Distt: Courts Abbottabad

Subject: PARAWISE REPLY OF SHOW CAUSE NOTICE.

Respected Madam:

In response to your office letter No 7741 dated 29-09-2014 parawise comments /reply are submitted in your honour as under:

PARA NO: 1 in response to advertisement of then EDO (E & SE) Mansehra, the undersigned applied for the post of QARIA and appeared in ETA test under Roll No 639 and obtained marks 120 out of 300. The merit list of the candidates was prepared by the office whereas the name of the undersigned was fall at S.No15.

After due process of recruitment I was selected and appointed against the post of QARIA under Endstt No 893-942 Estt (F) Apptt: Qaria (F) 2012 dated Mansehra the 16-06-2012 at GGHSS Baffa Mansehra. (Copy attached)

PARA NO: 2 The undersigned has no knowledge regarding inquiry under reference as she was not called by any inquiry officer / committee to explain her position. Without providing the opportunity of defense, the recommendation of such inquiry has no legal sanctity and could not adversely affect the established rights of the undersigned.

PARA : 2-A. How the office could level charges of misconduct, dishonesty and getting bogus/ fake appointment as the appointment of the undersigned was made by the competent authority according to recruitment policy on the merit position for which I was deserve according to merit list.

PARA: 2-B. I delivered services according to my job description and received salary. The charge of inflicting huge financial losses is result of concoction and against the facts.

PARA: 2-C That, no concealment of facts was made by the undersigned and my appointment was made after due recruitment process on merit by the competent authority.

MADAM,

26

Prior to issuance the appointment order the appointing authority sought guidance regarding ASNAD issued by the various institutions vide his letter No 51341 dated 14-05-2012. The remarks /reply made by the Director (E & SE) Peshawar on the body of the letter are reproduced as under.

"EDO (E & SE) Mansehra / As per service structure and prescribed rules the SANAD of Qirat from a recognized institution meant a certificate obtained from a MADRASA / institution registered with Govt of Khyber Pakhtoon Khawa" (Copy attached).

However, the undersigned appeared as a private candidate and acquired the requisite qualification / ASNAD from a recognized institution during service period. (Copies attached).

It is further added that I was selected after completion due recruitment process and no irregularity was committed by me. The authority scrutinized my documents and passed appointment orders in favour of me and I am regularly performing my duties for the last two and half years with unblemished record. Hence show cause notice may please be set aside that is the result of misinterpretation of facts.

Thanks,

*Verified*

*J. I. Malik*  
*08/10/11*

AISHA BANO *Aisha Bano*  
EX-QARIA GGHS Baffa  
presently working as QARIA  
GGHS No-1 Mansehra

*Attested*  
*Muhammad*  
Muhammad Khan Talpali  
Advocate  
Distt: Courts Abbottabad



Annex E,

(27)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Aisha Bano D/O Shahzade working as Qaui GGHS/GGMS/GGP Malik Pindir was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary); Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.
  - i) Syed hidayat Jan, (PCS SG B-20) Agricultural Department (Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
  - ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved:
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhawa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Aisha Bano D/O Shahzade Qaui GGHS/GGM-GGPS GCMS (of G) Mansehra.

*(Signature)*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Endst: No. 1555-64 /AE- 3 /Estab: dated 03/03 /2015.

Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress \_\_\_\_\_
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: \_\_\_\_\_
10. Office File.

*(Signature)*  
District Courts Abbottabad

*(Signature)*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

The Director,  
Elementary & Secondary Education,  
KPK Peshawar.

Annex F

P-28

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDST NO1555-64/AE-I/Estab: DATED 03-03-2015 WHEREBY MAJOR PANALTY OF DISMISSAL FROM GOVT SERVICE WAS IMPOSED UPON THE APPELLANT IN A HIGHLY CAPRICIOUS/WHIMSICAL MANNER WITHOUT LAWFUL AUTHORITY (COPY OF IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS ANNEX "A")

PRAYER: CAPTIONED IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM THE DATE OF ITS ISSUANE DECLARING THE SAME WITHOUT LAWFUL AUTHORITY CONTRADUCTORY TO THE RECRUITMENT POLLCICY & RULES AND RE-INSTATE THE APPELLANT WITH ALL BACH BENEFITS AT THE SAME STATION.

Respected sir,

I would like to invite your kind attention to the following facts in connection to colorful exercise of power on the part of authority i-e DEO (F) Mansehra.

- (I) That the then EDO (E&SE) Mansehra invited application for recruitment of teachers of various cadres in Distt : Mansehra through advertisement published in daily MASHRAQ (copy attached and marked as Annex "B")
- (II) That as per procedure appellant applied for the post of QARIA, AT, TT & ETA test was conducted on 26-02-2011 and appellant appeared as a candidate under Roll No 639 and obtained 120 marks out of 300. (copy attached and marked as Annex "C")
- (III) That the then EDO conducted interview and scrutinized the documents of the candidates and merit list of the candidate was displayed for receiving objections. After due process the meeting of DSC was held and approved the cases of 21 candidates for appointment against the post of QARIA whereas the name of appellant falls at S.No 15 .
- (IV) That appointment order of the appellant was issued under Edstt No 893-942/Estt: (F) Apptt: Qaria (F)/2012 dated 16-06-2012 and Appellant was posted against the post of QARIA at GGHS Baffa.(copy attached and marked as Annex "D")
- (V) That appellant continuously performing her duty without any break for the last 02 Years & 09 Months while she received a show cause notice whereby allegations were leveled against the appellant based on concoction and concealment of facts. The same are reproduced as below.

"YOU WERE APPOINTED AS QARIA AT GGHS BAFFA VIDE DEFUNCT EXECUTIVE DISTRICT OFFICER (E & SE) MANSEHRA ENDSTT NO 893-942 /ESTT QARIA(F) /2012 DATED 16-06-2012 WHERE YOU WERE STRANGER FOR RECRUITMENT PROCESS INITIATED THROUGH ETA ACCEPTANCE OF YOUR APPEAL AND SUBSEQUENTLY YOUR APPOINTMENT ORDER WAS THE RESULT OF MISUSE OF AUTHORITY BY THE THEN EDO ACCORDING TO HIS SWEET WELL AND WISHES AGAINST THE RECRUITMENT RULES" ( Copy attached and marked as Annex "E")

Attested  
Muhammad Ali  
Advocate  
Distt: Courts Abbottabad

- (VI) That a comprehensive reply was submitted in response to show cause notice whereas appellant adopted continuation that she was appointed after due recruitment process and her appointment order along with 20 other candidates was issued in a lot after the approval of DSC ( copy attached and marked as Annex "F")
- (VII) That appellant received impugned order dated 03-03-2015 whereas the major penalty of dismissal from service has been imposed upon the appellant.
- (VIII) That appellant passed her professional qualification i-e HIFZ- UL- QURAN and TAJWEED from TRUST JAMIAT TALEEM -UL-QURAN, a Registered institution with the Federal Govt. ( copy attached and marked as Annex "G")
- (IX) That prior to issuance of appointment order the then EDO sought guidance regarding the institution issued ASNAD for appointment against the post of QARIA and the honorable Director (E & SE) KPK release his verdict on the body of letter i-e reproduced below.

"EDO (E & SE) Mansehra ----- AS PER SERVICE STRUCTURE AND PRESCRIBED RULES THE SANAD OF QIRAT FROM A RECOGNIZED INSTITUTION MEANT A CERTIFICATE OBTAIN FROM A MADRASA / INSTITUTION REGISTERED WITH GOVT OF KHABER PAKHTUN KHAWA.( copy attached and marked as Annex "H")

Sir,

(a) Appellant was appointed after due process of recruitment through ETA test and appointment order of 21 candidates was issued after the approval of DSC. The appellant served for a period of 02 Years and 09 Months without any break to the entire satisfaction of department.

(b) No inquiry was conducted or initiated. No opportunity of defense offered. No personal hearing was made. How the authority passed the order in the light of E & D rules and under what charges/evidence imposed such a harsh punishment of dismissal from service.

(c) That inquiry regarding illegal appointment was made against the then EDO who made appointment orders in peace meal of candidates who were really stranger for recruitment process. However appointment order of the appellant was passed after completion and due recruitment process.

It is further added that no such recommendation was made by the committee who was constituted to conduct inquiry against the then EDO/DEO.

In the light of above facts You are requested to set aside the impugned notification of dismissal from service that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station who was appointed against the post of QARIA in result of completion of due recruitment process on merit basis.

Attested  
 Mubina Ahsan Khan, Tanchi  
 Advoca  
 Dist: Courts Abbottabad

Dated: 9/3/2015

Yours Faithfully  
 (Appellant) Aisha Bano  
 AISHA BANO  
 QARIA GCMS (Girls) Mansehra.

Annex <sup>a</sup> G

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Final Merit List of Applicants for TAT-II( Applied for Qaria )District Mansehra

Sf	Roll No	Name	Father Name	Post Applied for	Address	D.O BIRTH	DATE OF DEC. OF RESULT	ETE A Marks	ETE A MARKS		Academic															T/Pe	Remarks
									Tot	P/age	SSC			FA/FSC			BA/BSC			MA/MSC							
											Obt	Tot	P/age	Obt	Tot	P/age	Obt	Tot	P/age	Obt	Tot	P/age					
1	330	BIBI BUSHRA ✓	FIDA HUSSAN	QARIA	MANGLOOR	02/02/1988	23/08/2007	184	300	24.533	548	850	9.671	687	1100	9.368	301	550	5.473				49.04				
2	756	SHAZIA	M AFZAL KHAN	QARIA	BANDA GESUCH	08/07/1977	2007	172	300	22.933	493	850	8.7	642	1100	8.755	268	550	4.873	679	1100	3.086	48.35				
3	85	AYSHA	M SADIQ	QARIA	OGHI MANSEHRA	18/03/1987	17/07/2008	136	300	18.133	541	850	9.547	641	1100	8.741	326	550	5.927	799	1100	3.632	45.98	Has been selected as AT			
4	328	FATIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR (3)	01/04/1984	09/08/2003	164	300	21.867	567	850	10.01	614	1100	8.373	311	550	5.655			0	45.90				
5	583	Farhat Bibi	M.Hamayun	QARIA	Dhodial	18/02/1981	14-03-200	136	300	18.13333	489	850	8.276	666	1100	9.355	312	550	5.673	770	1100	3.5	44.94				
6	440	MANAZZA	MOHD HAMYUN	QARIA	TRANGRI BALA	20/04/1988	17/09/2006	152	300	20.267	517	850	9.124	729	1100	9.941	293	550	5.327				44.68				
7	454	MADHIA BIBI	ALI KHAN	QARIA	AFZALABAD	04/11/1988	01/10/2002	172	300	22.933	654	850	11.54	711	1100	9.695	0	0	0	0	0	0	0	44.17			
8	331	BIBI SAEEDA SALAMA ✓	FIDA HUSAIN	QARIA	MANGLOOR (1)	18/04/1979	1988	176	300	23.467	507	850	8.947	531	1100	7.241	236	550	4.291				43.95				
9	688	ASMAT BIBI	ABDUL REHMAN	QARIA	LASSAN NAWAB	02/08/1981	17/05/2009	172	300	22.933	449	850	7.824	544	1100	7.418	280	550	5.091				43.37				
10	329	BIBI MARIUM	FIDA HUSSAIN	QARIA	MANGLOOR (4)	06/09/1986	09/08/2003	176	300	23.467	458	850	8.082	520	1100	7.091	240	550	4.364				43.00				
11	731	SAMMIYA RAHIEM ✓	RAHIM SHAH	QARIA	OGHI MANSEHRA	08/02/1988	01/12/2010	132	300	17.6	510	850	9	738	1100	10.06	468	800	5.85	0	0	0	42.51				
12	327	SAIMA BIBI ✓	FIDA HUSSAIN	QARIA	MANGLOOR (2)	01/04/1982	09/08/2003	140	300	18.667	559	850	9.865	557	1100	7.595	235	550	4.273				40.40				
13	453	ALYIA BIBI ✓	ALI KHAN ✓	QARIA	AFZALABAD	27/08/1988	01/10/2002	164	300	21.867	378	850	6.671	536	1100	7.308	217	550	3.946				39.79				
14	92	AYSHA Knawal	Khalil ur Rehman	QARIA	Labarkot	08/12/1991	2004	164	300	21.86667	579	800	9.65	539	1100	7.35	0	0	0				38.87				
15	387	AMBER ZEB ✓	ALAM ZEB	QARIA	PHULRA	31/03/1989	2008	148	300	19.733	701	1050	10.01	825	1100	8.523	0	0	0				38.27				
16	639	AISHA BANO ✓	SHAHZADA ✓	QARIA	M.M.POLE MANSEHRA	11/03/1990	20/05/2002	120	300	16	731	975	11.25	632	1050	9.029	0	0	0				36.27				
17	439	BUSHRA BIBI ✓	LAL KHAN ✓	QARIA	PHULRA	26/12/1991	2008	128	300	17.067	569	800	9.493	636	1100	8.673	0	0	0				35.22				
18	812	MAMOONA WAJID ✓	WAHJID ✓	QARIA	BHERKUND	12/08/1992	02/05/2003	120	300	16	612	900	10.2	657	1100	8.959	0	0	0				35.16				
19	200	HAMEEDA ✓	MOHD YOUSAF ✓	QARIA	PHULRA	20/06/1987	09/02/2009	124	300	16.533	768	1275	9.035	547	1100	7.459	0	0	0				33.03				
20	469	TABSUM	MOHD NAZIR	QARIA	OGHI MANSEHRA	27/04/1989	2007	156	300	20.8	662	1050	9.457	0	0	0	0	0	0				30.26				
21	139	SABA NOOR ✓	SHEIKH NOOR ELLAHI ✓	QARIA	MANSEHRA	18/02/1985	24/11/2000	132	300	17.6	666	1000	9.99	0	0	0	0	0	0				27.58				
22	2002	ASMA NAZ ✓	MANZOOR HUSSAIN ✓	QARIA	BEHALI			136	300	18.13333	490	850	8.647	0	0	0	0	0	0				26.78				

Muhammad Farid Khan  
District Courts Mansehra

DA (Femal)  
TE & S, Edu: Mansehra





Annex <sup>a</sup> C

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Final Merit List of Applicants for TAT-II (Applied for Qaria) District Mansehra

Sl	Roll No	Name	Father Name	Post Applied for	Address	D.O BIRTH	DATE OF DEC. OF RESULT	ETEA Marks	Academic																		T/PA	Remarks
									ETEA MARKS		SSC			FA/FSC			BA/BSC			MA/MSC								
									Tot	Page	Obt	Tot	Page	Obt	Tot	Page	Obt	Tot	Page	Obt	Tot	Page	Obt	Tot	Page			
1	330	BIBI BUSHRA	FIDA HUSSAN	QARIA	MANGLOOR	02/02/1988	23/08/2007	184	300	24.533	548	850	9.671	887	1100	9.368	301	550	5.473					49.04				
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5	583	Farhat Bibi	M.Hamayun	QARIA	Dhodial	18/02/1981	14-03-200	136	300	18.13333	499	850	8.276	686	1100	9.355	312	550	5.673	770	1100	3.5		44.94				
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7	454	MADHIA BIBI	ALI KHAN	QARIA	AFZALABAD	04/11/1988	01/10/2002	172	300	22.933	654	850	11.54	711	1100	9.695	0	0	0	0	0	0	0	44.17				
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9	688	ASMAT BIBI	ABDUL REHMAN	QARIA	LASSAN NAWAB	02/08/1981	17/05/2008	172	300	22.933	449	850	7.824	844	1100	7.418	280	550	5.091					43.37				
10	329	BIBI MARIUM	FIDA HUSSAIN	QARIA	MANGLOOR	08/09/1986	09/08/2003	176	300	23.467	458	850	8.082	520	1100	7.091	240	550	4.364					43.00				
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14	92	AYSHA Knawal	Khalil ur Rehman	QARIA	Labarkot	08/12/1991	2004	164	300	21.86667	579	900	9.65	539	1100	7.35	0	0	0					38.87				
15	387	AMBER ZEB	ALAM ZEB	QARIA	PHULRA	31/03/1989	2008	148	300	19.733	701	1050	10.01	625	1100	8.523	0	0	0					38.27				
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17	439	BUSHRA BIBI	LAL KHAN	QARIA	PHULRA	26/12/1991	2008	128	300	17.067	569	900	8.483	636	1100	8.673	0	0	0					35.22				
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19	200	HAMEEDA	MOHD YOUSAF	QARIA	PHULRA	20/06/1987	09/02/2009	124	300	16.533	768	1275	9.035	547	1100	7.459	0	0	0					33.03				
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21	139	SABA NOOR	SHEIKH NOOR ELLAHI	QARIA	MANSEHRA	18/02/1985	24/11/2000	132	300	17.6	666	1000	9.99	0	0	0	0	0	0					27.59				
22	2002	ASMA NAZ	MANZOOR HUSSAIN	QARIA	BEHALI			136	300	18.13333	490	850	8.647	0	0	0	0	0	0					28.79				

Mansehra District Council  
District Council Mansehra

Dist (Femc)  
IEE of Edu: Mansehra



قیمتی

کورٹ فیس

# وکالت نامہ

بعدالت KPK سر ویں گورنمنٹ لائبریری اور  
عنوان: عائشہ بانو (فارم) بنام گورنمنٹ KPK ایجوکیشن ڈپارٹمنٹ  
منجانب: ایڈووکیٹ  
نوعیت مقدمہ: اصل

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

محمد اسد خان سنہری ایڈووکیٹ ہائی کورٹ رول نمبر ۱۱۱۱

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام ذورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصینہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المترقوم:

بمقام:

Attested  
M. Asad Khan Tanoli  
Adv High Court Attd

Aysha Bano  
عائشہ بانو

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



وفاق المدارس العربیة  
باكستان

# كشف الدرجات

امتحان شهادة الثانوية العامة في العلوم الإسلامية والعربية (ميتريك)  
١٤٢٥ هـ (اللسنتات)

رقم التسجيل ٩٥٧٤٨١ رقم الجلوس ١٣٥٥٢

اسم الطالب عائشہ بانو اسم القوالد شہنازہ

المديونية حائضہ تاريخ الميلاد ١٤١٠ / ١٠ / ١٩٩٠ هـ

اسم الجامعة / المدرسة دارالعلوم اہل سنت والجماعت لبرکوت (حائضہ)

الدرجة	المادة	الدرجة	المادة
٩٧	الصرف	٧٣	التفسير
٨٠	التحوي	٧٧	الحديث
٧٤	التاريخ والأدب العربي	٦٦	الفقه

الدرجة الصغرى ٤٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ٦٠٠ - الدرجات المخصلة ٤٧

نشكركم إدارة وفاق المدارس العربیة ان الطلبة المذكورة اعلاه قد تمكنت في امتحان الشهادة الثانوية العامة بتقدير  
بمقدیر

وَصَلَّى اللهُ عَلَى سَيِّدِنَا مُحَمَّدٍ وَآلِهِ وَصَحْبِهِ وَسَلَّمَ



المكتب الرئيسي بلتان

توقيع مراقب الامتحان

*(Signature)*

التاريخ ٢٥ / ١٠ / ٢٠٢٥

Alimia  
Centermal Model  
ool (Boys) Manshera

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.779/2015

Respectfully Shewth

1. That the services appeal No: 779/2015 in respect of MST: Ayesha.Bano is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4218-23 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellat has been conditionally reinstated against the post of Qaria (Notification attached)

It is requested that the above mentioned appeal may kindly be dispose off please.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

ADD

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Aisha Bano, Qaria at Government Centennial Model School for Girls No. 1 Manshera District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1555-64 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Her name was at S.No. 16 of the merit list. Her asnad of Hifzul Quraan and Tajweed ul Quran was from Jamia Islamia Noorul Islam ulbanatul Muslimeen, whereas the sanad of Tajweedul quraan is not found. She was acquired a certificate of teaching from Trust Jamiat Taaleem ul Quraan for teachers of Quraan e Kareem. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.15.
2. Appeal may be accepted subject to condition that the madaris/ institution from where she acquired asnad (Qirat & Hifz ul Quran) for the post of Qaria must be affiliated with Wafaq ul Madaris, in line with the Govt. of KPK E&SE Deptt. Letter No. SO(PE)5-12/ Darululoom Swat/ Chitral/ 10 dated 7/6/2012.


NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1555-64 dated 03/03/2015 and reinstate Ms. Aisha Bano, Qaria, at Government Centennial Model School for Girls No. 1 Manshera District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4218-23 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8 /2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Mansehra with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Asha Bano, Qaria and place on record under intimation to this office.
2. District Accounts Officer Mansehra
3. Principal, Concerned
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

  
Deputy Director (Female)  
Directorate E&SE, KP  
Peshawar