

22.05.2018

Appellant Fazal Wahab alongwith Mr. Tanveer Ahmad Fazal, Advocate present. Mr. Usman Ghani, District Attorney alongwith Lutfullah, Litigation Assistant for the respondents present.

At the very outset of the arguments, the learned counsel for the appellant stated at the bar that the appeal in hand, frankly speaking, has become infructuous. He stated that during the subsequent enquiry conducted by the department, his service was not found in accordance with the law and so he was removed from service. However, his appeal bearing No. 572/2017 was allowed by this Tribunal on 12.04.2018 with the direction to the department to conduct denovo proceedings against the appellant. So after passing of the order by this Tribunal, the present appeal became infructuous. In support of his contention, the learned counsel for the appellant produced a copy of order of this Tribunal which is placed on file.

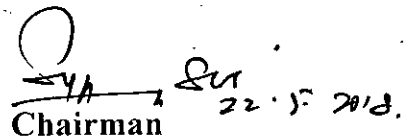
In view of the above stated situation, the appeal in hand stands disposed of being infructuous. File be consigned to the record room.

ANNOUNCED

22.05.2018



Member



Chairman

Camp court, A/Abad

21.08.2017

Counsel for the appellant and Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for final hearing on 23.11.2017 before the D.B at camp court, Abbottabad.

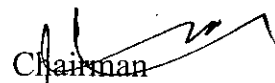

Member


Chairman
Camp court, A/Abad

23.11.2017

Clerk of counsel for the appellant and Mr. Kabeerullah Khattak, Addl. AG alongwith Haq Nawaz, ADO for the respondents present. Counsel for the appellant is not in attendance due to illness. Appellant seeks adjournment. Adjourned. To come up for arguments on 20.02.2018 before D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad

20.02.2018

Clerk of counsel for the appellant and Mr. Ziaullah, DDA alongwith Haq Nawaz, ADO for the respondents present. Seeks adjournment as counsel for the appellant is not in attendance. To come up for arguments on 22.05.2018 before the D.B.


Member


Chairman
Camp court, A/Abad.

18.08.2016

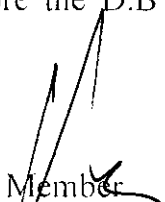
Mr. Tanveer Ahmad Mughal Advocate for appellant present and Wakalatnama submitted. Mr. Tauqeer Khan, Assistant alongwith Mr. Muhammad Bilal, GP for the respondents present. Written reply by respondents No. 1 & 2 submitted. Learned Sr.GP relies on the same on behalf of respondents No. 3 . The appeal is assigned to D.B for rejoinder and final hearing for 13.2.2017 at camp court, Abbottabad.


Chairman

Camp court, A/Abad

13.02.2017

Counsel for the appellant and Mr. Muhammad Yousaf, Assistant alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Rejoinder not submitted. Counsel for the appellant requested for adjournment. To come up for rejoinder and final hearing on 21.08.2017 before the D.B at camp court. Abbottabad.


Member

Camp court, A/Abad


17.02.2016

Appellant Deposited
Security & Process Fee

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as PST and there-after promoted to BPS-14 on 1.3.2013. That his salary was stopped with effect from 1.1.2015 on verbal orders of respondent No.3 where-against he preferred departmental appeal on 20.10.2015 which was not responded and hence the instant service appeal on 8.2.2016.


That the appellant is entitled to receive salary and other service benefits and withholding of the same by the verbal orders of respondent No.3 is violative of 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 18.5.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad

18.5.2016

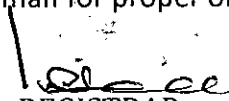

Appellant in person and Mr. Muhammad Tauqeer Khan, Assistant alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Requested for adjournment. To come up for written reply/comments on 18.08.2016 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 133/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08.02.2016	<p>The appeal of Mr. Fazal Wahab presented today by Mr. Ahmad Farooq Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> REGISTRAR</p>
2	9-2-16	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>17-2-2016</u></p> <p> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 133/2016

Fazal WahabAppellant

VERSUS

Government of Khyber Pakhtunkhwa
through Secretary Education, Peshawar
and othersRespondents.

SERVICE APPEAL

INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of Service appeal alongwith affidavit.	1-5
2	Correct addresses of the parties.	6-0
3	Copy of the order dated 06.07.2008.	"A"	7-0
4	Copy of the transfer order.	"B"	8-0
5	Copy of the service book.	"C"	9-15
6	Copy of the certificate alongwith other academic testimonials.	"D"	16-24
7	Copy of the departmental representation.	"E"	25-0
8	Wakalat Nama.	26-0

Dated 06.02.2016


Fazal Wahab
...Appellant

Through


AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

①

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

Appeal No. 133/2016

Fazal Wahab son of Raheemullah caste
Yousafzai resident of Rashang, Tehsil
Allai District BattagramAppellant

**P.W.P. Province
Service Tribunal
Diary No. 98
dated 08-2-2016**

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education, Peshawar.
2. District Education Officer (Schools & Literacy), Battagram
3. Sub-Divisional Education Officer (Schools & Literacy), Tehsil Allai District Battagram.....Respondents.

u-s-483-TACT 1974

**SERVICE APPEAL / REGARDING
SALARY FROM 01.01.2015 TO TILL
DATE AND TILL THE DISPOSAL OF
APPEAL.**

PRAYER: -

On acceptance of the instant service appeal, the respondents be directed to release the monthly salary of the appellant for the month of January, 2015 to till date and they be also directed to pay monthly salary of appellant till disposal of the appeal.

8/2/16

Respectfully Sheweth!

1. That, the appellant was appointed as PST in BPS-7 in education department vide order dated 06.07.2008.

(Copy of the order dated 06.07.2008 is annexed as annexure "A").

2. That, the appellant took over the charge and performed his duties regularly.

3. That, later on at subsequent stage on 02.07.2015, appellant was transferred from GPS Chohan to GPS Faqiro against vacant post.

(Copy of the transfer order is annexed as annexure "B").

4. That, on 01.03.2013, appellant was allowed in BPS-14 vide order No.1-18/2010 dated 01.01.2012.

(Copy of the service book is attached herewith as annexure "C").

5. That, the appellant has successfully passed his PTC examination in the year of 1999.

(Copy of the certificate alongwith other academic testimonials are annexed as annexure "D").

- 6. That, the appellant's monthly salary from January, 2015 to till date was stopped by the respondents without any reason against which the departmental representation was moved on 20.10.2015.

(Copy of the departmental representation is annexed as annexure "E").

- 7. That, the appellant challenges the illegal action of respondents inter alia, on the following grounds: -

GROUNDS

- a. That, the stoppage of the monthly salary of the appellant by respondent No.3/respondents is without lawful authority, illegal, void-ab-initio, against the rules and regulations and hence not maintainable.

(4)

- b. That, no show cause notice was given to the appellant for the reason, to stop the monthly salary.
- c. That, the appellant is regularly performing his duties, therefore, he is entitled for the monthly salary.
- d. That, by not releasing the monthly salary, the respondents have committed illegality.
- e. That, it is the basic as well as fundamental rights of the appellant to receive salary for the duties he has performed but this right has been infringed in a discriminatory manner by the respondents.
- f. That, the other grounds will be raised and discussed at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant service appeal, the respondents be directed to release the monthly salary of the appellant from January, 2015 to till date and they be also directed to pay

(5)

monthly salary of appellant till disposal of appeal.

Dated 06.02.2016



Fazal Wahab
...Appellant

Through



AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

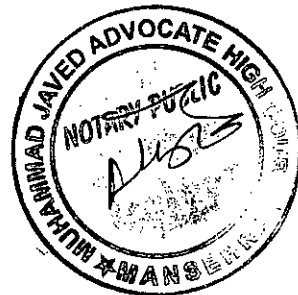
AFFIDAVIT.

I, Fazal Wahab son of Raheemullah caste Yousafzai resident of Rashang, Tehsil Allai District Battagram, Appellant, do hereby solemnly affirm and declare on oath that the contents of the 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 06.02.2016



Fazal Wahab
(DEPONENT)



06/02/16

(6)

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

Fazal WahabAppellant

VERSUS

Government of Khyber Pakhtunkhwa
through Secretary Education, Peshawar
and othersRespondents.

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Fazal Wahab son of Raheemullah caste
Yousafzai resident of Rashang, Tehsil
Allai District Battagram.

RESPONDENTS

1. Government of Khyber Pakhtunkhwa
through Secretary Education, Peshawar.
2. District Education Officer (Schools &
Literacy), Battagram
3. Sub-Divisional Education Officer
(Schools & Literacy), Tehsil Allai District
Battagram.

Dated 06.02.2016


Fazal Wahab
...Appellant

Through


AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

"7" "A"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) BATTAGRAM.

APPOINTMENT:

Consequent upon the approval of the District Selection Board Battagram, Mr: Fazal Wahab S/O Rahim Ullah R/O Village Rashang Tehsil Allai District Battagram is hereby appointed against PST post at Govt: Primary School Nehrai against vacant post in B-7 plus usual allowances admissible to him under the rules @ 25% open Merit in the interest of public service with effect from his date of taking over charge on the following terms and conditions:-

TERMS AND CONDITIONS.

1. Charge report should be submitted to all concerned.
2. He is entitled to get all benefits as admissible under the rules in Civil servant Act except pension. He should however be entitled to receive such amount contributed by him towards the contributory Provident Fund & with contribution made by the Provincial Govt: to his account in the said funds in prescribed manner.
3. His service will be liable to termination on one month notice from either sides, in case of resignation without notice his one month pay shall be forfeited to the Govt: treasury.
4. The candidate required to produce Age & Health certificate from DHQ Battagram.
5. The candidate should join his post within seven days of the issue of this order, otherwise appointed order will be cancelled.
6. The appointee will get salaries against sanctioned post in the budget.
7. He will be paid salaries after verification of his documents from the concerned university/board/Institution on his own expenses by DDO concerned. Personally or by hand verification will not be acceptable.

sd/-
(MUKHTAR AHMAD SWATI)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY BATTAGRAM

Endst: No 3192-96 / EB/AR-II/F-Adptt:2007 Dated 16-07-2008

Copy forwarded for information and necessary action to the:

1. District Coordination Officer Battagram.
2. Deputy District Education Officer (Male) S&L Battagram.
3. District Accounts Officer Battagram.
4. Candidate concerned.

(Signature)
DISTRICT OFFICER (MALE)
(SCHOOLS & LITERACY BATTAGRAM)

Attested
(Signature)

"A"
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**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM**

Phone # 0997311439 & 0997310670

NOTIFICATION

Consequent upon the recommendation of placement committee in meeting held on 01/07/2015. The following PSHT ~~BPS:15~~ & PST ~~BPS:12~~ are hereby transferred to the school mentioned against each on their own pay & grade in the interest of public service with immediate effect.

S.No	Name of teacher	Desig	Present School	Name where transferred	Remarks
1.	Muhammed Ayaz	PSHT	GPS: Kucha Pasho	GPS: Banara	Against V/Post
2.	Dil Muhammad	PSHT	GPS: Cham Mirani	GPS: Mondri	Against V/Post
3.	Latif Khan	PSHT	GPS: Battangi KZ	GPS: Cham Mirani	Vice S.No.2
4.	Niaz Muhammad	PSHT	GPS: Shahfoot	GPS: Garang	Against V/Post
5.	Bakht Munir	PSHT	GPS: Peshto	GPS: Seri Paimal	Against V/Post
6.	Gul Rehman	PSHT	GPS: Kandar (Chap)	GPS: Kachal	Vice S.No.7
7.	Noorul Islam	PSHT	GPS: Kachal	GPS: Chinaw	Vice S.No.8
8.	Gul Muhammad	PSHT	GPS: Chinaw	GPS: Kandar Chappararam	V.S.No.6
9.	Muhammad Quresh	PST	GPS: Mattai Gendar	GPS: Gangwal	Vice S.No.10
10.	Shah Ghufaran	PST	GPS: Gangwal	GPS: Mattai Gantar	Vice S.No.9
11.	Bakht Zada	PST	GPS: Barsar	GPS: Thakot	Against V/Post
12.	Mirjuddin	PST	GPS: Andar Wali	GPS: Kachal Soanai	Against V/Post
13.	Fazal Wahab	PST	GPS: Chonai	GPS: Fairo	Against V/Post
14.	Sadiqur Rehman	PST	GPS: Mattai Gantar	GPS: Gangwal	Against V/Post

NOTE: 1. Charge report should be submitted. 2. NO TA/DA is allowed.

MUHAMMAD SHAUKAT
DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM

Endst No: 3345-49 Dated: 02/07/2015

- Copy to the:
1. Director Edu (E&SE) Khyber Pakhtunkhwa Peshawar
 2. District Accounts Officer Battagram
 3. SDEO(M) Battagram/Allai
 4. All Headteachers concerned
 5. Office File

BY DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM

Attested
[Signature]

(For use in Police Department only).

9 "C"

Passed the SSC Exam from BISE Abad Abad.
under roll No. 17096. Session 1996 mark. 458/850.

Heirs.

- 1.
- 2.
- 3.

Deputy District Officer
(Male) Primary Battagram

Passed the FA Examination from BISE Abad Abad under

Verification Roll No. 8809. Session 1999. mark. 463/1100 received back

Deputy District Officer
(Male) Primary Battagram

Passed the PFC Examination from BISE Peshawar
under roll No. 1554. Session 1999. mark. 659/1200

Left Thumb Impression

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L. or B.A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualifications—	
Drill Instructing			
Court Duties			
Reserve Duties			

Attached
[Signature]

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

entries on this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

Name: Fazal wahab

Race: Yousofzai Mada Khail

Residence: Alon Ballegram


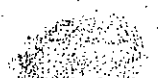
Father's name and residence: Rahimullah



Date of birth by Christian era as nearly as can be ascertained: (1-1-1979)
1st of January N.H. Seventy Nine


Exact height by measurement: 5-5

Personal marks for identification:

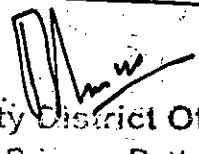
Left hand thumb and Finger impression of (Non-Gazetted) officer:

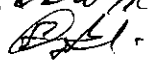
Little Finger:  Ring Finger: 

Middle Finger:  Fore Finger: 

Thumb: 

9. Signature of Government Servant: 

10. Signature and designation of the Head of the office, or other Attesting Officer: 
Deputy District Officer
(Male) Primary Ballegram

Attested 

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
PST G.P.S.							
Chaitanya		G. 3530-190-9230-7.					
Nehrao			3530/-			27/2008	[Signature]
do			3720/-			13/08	[Signature]
do			3910/-			12/09	[Signature]
do			4100/-			12/10	[Signature]
G.P.S.		G: 5800-320-15400-7					
Nehrao			6760/-			7/2011	[Signature]
do			7080/-			12/2011	[Signature]
do		Rs: 7000-500-22000-12					
do			7500/-			7/2012	[Signature]
do			8000/-			12/2012	[Signature]
do		Rs: 8000-610-26300-12					
do			8610/-	810/- Pw		3/13	[Signature]
G.P.F. Chohan			9220/-			3/13	[Signature]
do			9830/-			12/13	[Signature]
do			10440/-			12/14	[Signature]

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(M)

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
Signature of Government servant	Name and Designation of the office of establishment of posts 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to Which debitabale	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/08	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			ORDER Appointed as a P.T.C. at Nehrwal SPS. Baghban Nehrwal against v. post vide. E&S (E&S) Battagram. 15th H No. 3192-96-act. 6-7-2008.
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/09	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/10	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/11	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			Deputy District Officer (Male) Primary Battagram
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/11	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			Copies Verified w.e. 17-7-08 30-11-08 from the Attendance roll & other record kept in this office
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/12	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			Copies Verified w.e. 1-12-08 30-11-08 from the Attendance roll & other record kept in this office
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/12	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			Copies Verified w.e. 1-12-08 30-11-08 from the Attendance roll & other record kept in this office
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/13	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			Copies Verified w.e. 1-12-08 30-11-08 from the Attendance roll & other record kept in this office
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	30/14	ant	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			Copies Verified w.e. 1-12-10 30-11-11 from the Attendance roll & other record kept in this office
<i>[Signature]</i>	Dy. D.O. E&SE (M) Battagram	2/07 2015	Transfer to 4PF Faq 20	<i>[Signature]</i> Dy. D.O. E&SE (M) Battagram			Copies Verified w.e. 1-12-10 30-11-11 from the Attendance roll & other record kept in this office

Attested
[Signature]

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to Which debitable		
				<p>Allowed BPS No 12 vide no. notification NO SO (FR) FP/10-22 (ESSE) 2010 dated 16/7/2012</p>			
						<p>Deputy District Officer (Male) Elementary & Secondary Education Battagram</p>	
				<p>Advised Rs 2500/- due to up gradation w.e.f 1-7-12 to 31-5-2012 12/16/12</p>			
						<p>District Accounts Officer Battagram</p>	
				<p>Service Verified w.e.f 1-12-2011 30-11-12 from the Appointment roll & other record kept in this office</p>			
						<p>(ESSE) Battagram</p>	
				<p>Allowed BPS No 14 vide no. notification NO SO (FR) 1-18 (ESSE) 2010 dated 11/7/2012 w.e.f 1-3-2013.</p>			
						<p>Sub. Divisional Education Officer (Male) Battagram</p>	
<p>Attested BPS</p>				<p>upgraded to BPS 14 w.e.f 13.12.</p>			



PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

Form: PAY02

Date: _____

Page No.: _____

OFFICE OF THE Sub: Divisional Education Officer (M) Allai

FOR THE MONTH OF July 2015 7/2015

DDO Code ⁵ (Cost Center) Bm 70 33 Description SDEO (M)

Personnel Number ⁷ 00660390 Employee Name ³ Fazal Wahab. National ID ⁹ Card No. _____

Grade (Pay Scale Group) ¹⁰ 12 P.S.T

Salary ¹² Status Start Stop

Attached
[Signature]

(15) (51)

GENERAL DATA CHANGE ¹³			CHANGE IN PAYMENTS/DEDUCTIONS ¹⁷							Effective Date ²¹	Remarks ²²		
Info Type	Field ID ³	New Contents ¹⁵	Wage Type ¹⁸	Amount									
				Rupees ¹⁹				Paise	Adj				
		B. Pay	0001	9	0	0	0	-	-			2-7-15	Transferred from GPs: Chohan (BM) to GPs: Faziro (Allai) vide DEO (M) Bhatnagar E.No. 3345 49 dt 2-7-15 Copy attached.

[Signature]
SDEO (M)
Allai

S.No. 187

رب، زدن عا

Roll No. 1554

GOVT COLLEGE OF EDUCATION FOR ELEMENTARY TEACHERS (MALE)
MANSEHRA

PROVISIONAL CERTIFICATE.

This is to certify that Mr. Fazal Urshab
S/O Rahimullah
passed the "P/C.C.T.D.M" Examination 1999 under
Roll No. 1554 in II Division, obtained 669
marks out of 1200 according to the result gazette notification issued
by the Registrar Departmental Examination Education Department N.W.F.P.,
Peshawar.

His date of Birth according to college record is (in figures) 1-01-1979
(in words) 1st January 1979

Admission No. 169 The result was declared on 9.5.2000 via RDE No. 16399/L/77-2000

His conduct during his stay at this college was Good

Prepared by: Shoaib

Checked by: Butt

PRINCIPAL
GOVT. COLLEGE OF EDUCATION
FOR ELEMENTARY TEACHERS (M)
MANSEHRA.

Attested
[Signature]

16 (D)

(17)

Board of Intermediate & Secondary Education ABBOTTABAD



DETAILED MARKS CERTIFICATE

67796 Intermediate Examination (Humanities Group)
Part - II

S. No: A

Session 19 99 (Annual / Supplementary)

Name

Fazal-wahab

Father's Name

Rahim-ullah

Roll No. 8809

SUBJECT	Subjects Marks	MARKS OBTAINED				REMARKS
		Part - I	Part - II	Total in		
				Figures	Words	
1. English	200			66		
2. Urdu	200			74		
3. Islamic Education	50			43		
4. Pakistan Studies	50			75		
5. <i>Eco</i>	200			82		<i>Four hundred & Sixty three only</i>
6. <i>stat</i>	200			73		
7. <i>pa</i>	200					
Total	1100			463	D	

Note: Errors/Omissions excepted

Date 17 JAN 2000

Controller of Examinations
Board of Intermediate & Secondary Education
Abbottabad

Prepared by: *[Signature]*

Checked by: *[Signature]*

Attasted
[Signature]

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBATABAD BOARD OF INTERMEDIATE & SECONDARY EDUCATION
BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



SB No. 05553

DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination

(SCIENCE GROUP)

Session 1996 (Annual/Supplementary)

Name: Faraz Hameed

Father's Name: Rubina Meek

Roll No. & Section: 12096

SUBJECT	Total Number of marks allotted	MARKS OBTAINED	
		Theory	Practical
1. English	150	80	80
2. Urdu	150	70	80
3. Islamiyat	75	57	18
4. Pakistan Studies & Gen. Mathematics	75	38	37
5. Electronics	100	67	33
6. Physics	100	47	53
7. Chemistry	100	49	51
8. Biology	100	42	58
Total	850	458	392

Note: Errors/Omissions excepted in the paper(s) Failed in the paper(s)

Prepared by: SEC Checked by: BOE

Date: 04 JULY 1996

Controller of Examinations Board of Intermediate & Secondary Education Abbottabad

Attested
[Signature]

22659

/PC

Roll No

2209

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

ABBOTTABAD
N. W.F.P. PAKISTAN

PROVISIONAL CERTIFICATE

INTERMEDIATE EXAMINATION

Session 1999 Annual/Supplementary

Hum Group

THIS IS TO CERTIFY THAT

Fozal Wahab

Son/daughter of

Raheemullah

and a candidate of

Butebran

Registered No. _____ has passed the INTERMEDIATE EXAMINATION of the

Board of Intermediate & Secondary Education Abbottabad held in Nov 19 99

as a Regular/Private candidate. He/She obtained 463 Marks out of 1100 and

has been placed in Grade (D) Representing Govt

The Examination was taken as a whole/in parts

Prepared by

[Signature]

Checked by

[Signature]

Date of Preparation

10/2/2000

Asstt. Secretary (certificates)

Attested
[Signature]

ADS 053059

Roll No. 8809

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Abbottabad N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION

HUMANITIES Group

SESSION SUPPLEMENTARY 1999

THIS IS TO CERTIFY THAT FAZAL WAHAB

Son/Daughter of RAHEEM ULLAH

and a Candidate of BATTAGRAM

Registered No. has passed the Intermediate Examination of the

Board of Intermediate and Secondary Education, Abbottabad held in November 1999.

as a Private candidate. He/She obtained 463 Marks out of 1100

and has been placed in Grade D Representing FAIR

The Examination was taken as a whole/in parts and the candidate passed the following subjects:

- 1. English
- 2. Urdu
- 3. Islamic Education - Pakistan Studies
- 4. ECONOMICS
- 5. PASHTO
- 6. STATISTICS

Asst. Secretary

Secretary

This certificate is issued without alteration or erasure.

Attested
[Signature]

DETAIL MARKS CERTIFICATE

TRAINING CLASSES EXAMINATION P.T.C. 199

Roll No... 1554 ... Name... Fazal Wahab Son / Daughter of... Rahimullah

Serial No.	SUBJECT	Max Marks	Marks Obtained		TOTAL
			Interl:	Exterll	
1.	Principles of Edu, and Method of Teaching	100			45
2.	Child Devept: and Counselling	100			49
3.	School Org: and Class Room Management	100			52
4.	Lang: and Method of Teaching	100			50
5.	Mathematics and Method of Teaching	100			42
6.	Science and Method of Teaching	100			46
7.	Social Studies and Method of Teaching	100			45
8.	Islamiat and Method of Teaching	100			61
9.	Art and Craft, Art and Method of Teaching	100			59
10.	Health and Principle of Education	100			57
11.	Teaching Practice	200			163
Grand Total		1200			669

One Hundred & Sixty Nine

Passed/Failed _____

Division Head Division

To Re-appear in

- 1 _____
- 2 _____
- 3 _____

Prepared by... 9/3/6...

Checked... Akhtar Gul
 Deputy Registrar,
 Departmental Examination,
 Education Department N.W.F.P.,
 PESHAWAR.

Date of declaration... 25/4/2000

Attested
[Signature]

For/ Akhtar Gul
 Dy: Registrar,
 Departmental Examination,
 Education Department,
 N.W.F.P., Peshawar.

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر سکولز اینڈ لٹریسی بنگرام

عنوان: ڈیپارٹمنٹل اپیل بابت واہگزاری ماہانہ تنخواہ سائل۔

جناب عالی! درخواست ذیل پیش ہے۔

(۱) یہ کہ سائل محکمہ تعلیم میں بروئے حکم نامہ محررہ 06.07.2008 بطور PST تعینات ہوا۔

(۲) یہ کہ سائل نے حسب ضابطہ اپنا چارج سنبھالا اور اپنے فرائض منصبی انتہائی احسن طریقہ سے سرانجام دے رہا ہے۔

(۳) یہ کہ بعد ازاں سائل کو گورنمنٹ پرائمری سکول چوہان سے گورنمنٹ پرائمری سکول فقیرو میں خالی پوسٹ پر تعینات کیا گیا۔

(۴) یہ کہ مورخہ 01.03.2013 کو سائل کو BPS-14 میں بروئے حکم نامہ نمبری 1-18/2010 مورخہ 01.01.2012 ترقی دی گئی۔

(۵) یہ کہ سائل نے اپنا PTCL کورس سال 1999ء میں مکمل کیا۔

(۶) یہ کہ بعد ازاں سائل کی تنخواہ بغیر کسی قانونی جواز کے جنوری 2015ء سے بند کر دی گئی اور اس وقت سے لے کر تاحال سائل کو تنخواہ کی ادائیگی نہیں کی گئی۔

(۷) یہ کہ سائل چونکہ باقاعدگی سے اپنے فرائض منصبی سرانجام دے رہا ہے بدیں وجہ سائل کو تنخواہ جاری کرنا اس کا بنیادی، قانونی و آئینی حق ہے۔

(۸) یہ کہ سائل کو ماہانہ تنخواہ کی بندش کی نسبت نہ تو کوئی شوکاژ نوٹس جاری کیا گیا۔ یوں سائل کی تنخواہ بلا جواز طور پر بند کی گئی ہے۔

لہذا استدعا ہے کہ بمنظوری اپیل ہذا سائل کی تنخواہ حسب ضابطہ واہگزارا جاری کئے جانے کا حکم صادر فرمایا جائے۔ المرقوم 20.10.2015

فضل وہاب ولد رحیم اللہ قوم یوسف زئی ساکن راشنگ تحصیل آلائی ضلع بنگرام
PTC گورنمنٹ پرائمری سکول فقیرو تحصیل آلائی ضلع بنگرام..... سائل

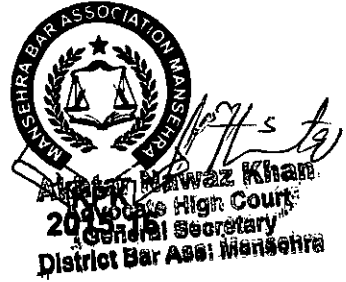
Attestal
الحکم

DBM No. 216

BC No. 10-3221

Name of Advocate. صالحہ ناز خان

S.No _____



وکالت نامہ

بعدالت سروس ٹرانسکریپشن

عنوان: فضیل ابوبکر بنام مکرمہ

مخائب: رسید نوعیت مقدمہ سروس باعت تحریر آنکھ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے بیرونی وجوہات کی بنا پر صالحہ ناز خان کے لیے

کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور اذیت پکارے جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچہری کے خلاف کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے خلاف کسی اور جگہ سماعت ہو یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد ثالثی و رضامندی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا۔ بصورت اپیل و برآمدگی مقدمہ یا منسوفی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء سے ڈگری بھی وکیل موصوف کو بشرط ادا جنگی علیحدہ محتاج ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا ایئر سٹریٹو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیار حاصل ہوں گے جیسے وکیل موصوف کو اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرواختہ وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سند ہے۔ مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے۔

فضیل ابوبکر

مورخہ 8 فروری 2016

ACCEPTED

صالحہ ناز خان

صالحہ ناز خان

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA CAMP COURT ABBOTTABAD

Service Appeal No. 133/2016

Fazal WahabAppellant

VERSUS

**Government of Khyber Pakhtunkhwa through Secretary Education
and others.....Respondents**

Index

S. No	Description /Documents	Annexure	Pages
1	Comments		1 to 5
2	Affidavit		6
3	Copy of dispatch register	A	7,8
4	Report of circle ASDEO, Copy of teachers attendance register for the month of 6,7/2008,log book 2008,9	B, C D	9 to 16
5	Report of circle ASDEO, Copy of teachers attendance register for the month of 6,7/2015	E F	17,18
6	Inquiry report & show cause notice & source form	G H I	19, 20 , 21 & 22 23

Respondent

①

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA CAMP COURT ABBOTTABAD

Service Appeal No. 133/2016

Fazal WahabAppellant

VERSUS

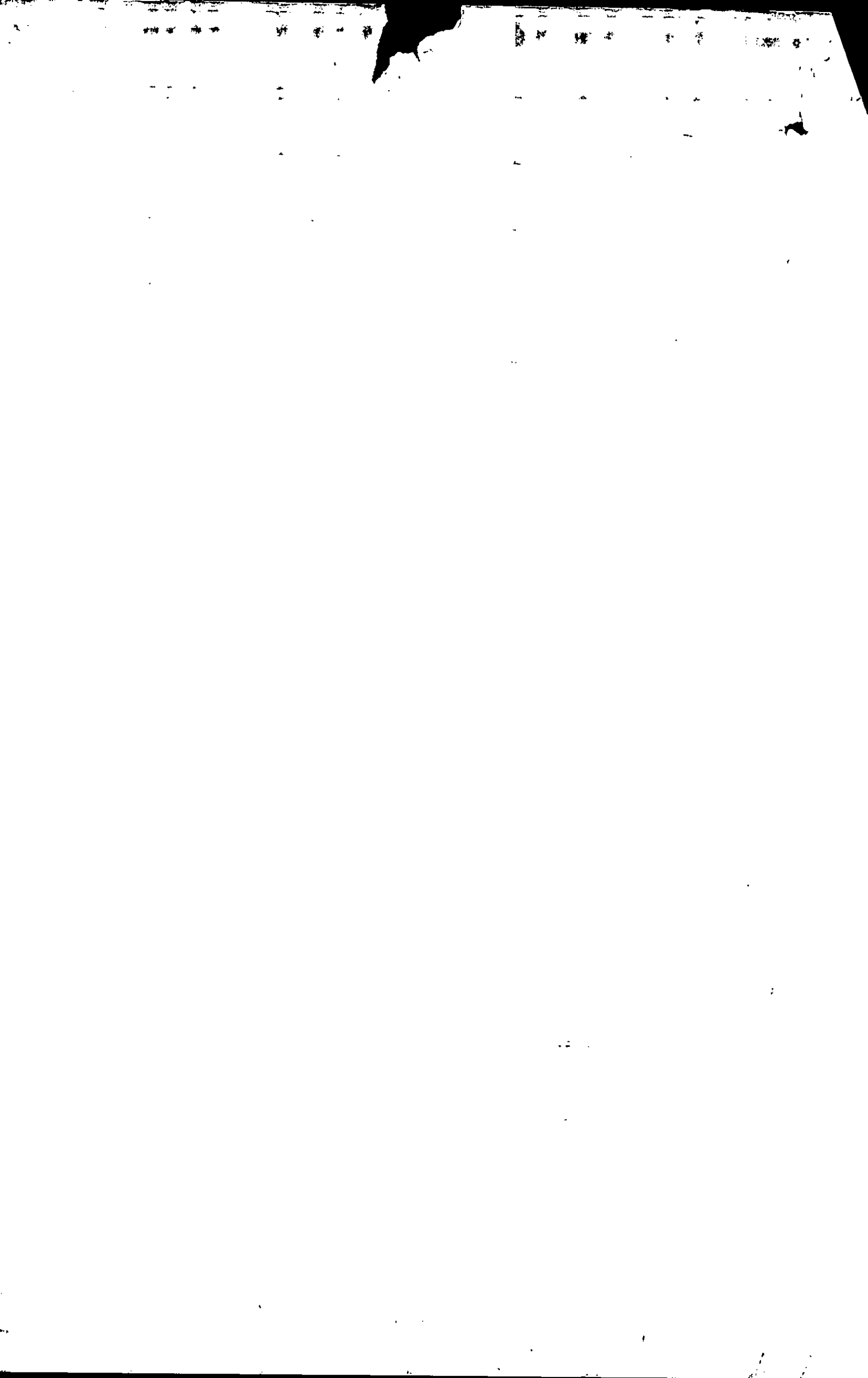
Government of Khyber Pakhtunkhwa through Secretary Education
and others.....Respondents

**Joint Para-wise comments /Reply on behalf
of Respondents No: 1 &2.**

Respectfully Sheweth:

Preliminary Objections

1. The appellant has got no cause of action / locus standi to file the instant appeal.
2. The appellant has not come to this Honorable Service Tribunal with clean hands.
3. The appellant has concealed the material facts from this Honorable Service Tribunal. Hence not entitled for any relief and the appeal is liable to be dismissed.
4. The appellant has filed the instant appeal on Malafide ground.
5. The appeal of the appellant is against the prevailing law and rules.
6. The appellant is stopped by his own conduct to file instant appeal
7. The instant appeal is not maintainable in its present form and also in the present Circumstances of the issue.



- 8. That the appeal is time barred by law, hence liable to be dismissed on this score alone.
- 9. That the appellant has not appointed as PST by the competent authority, the appointment order is fake & bogus hence the appeal is liable to be dismissed without any further proceeding with cost.
- 10. That the demand / claim of the appellant is against the law, rules and respondents are not bound to obey the illegal demand of the appellant ,hence the appeal is liable to be dismissed.

Facts:

- 1. **Incorrect:** The appellant has not been appointed as PST by the competent authority & that the appointment order No:3192-96 dated 06-07-2008 is fake & bogus. The above order No: 3192-96 dated 06-07-2008 does not match with the office dispatch record, hence the appeal is liable to be dismissed without any further proceeding.
(Copy of the dispatch register is annexed as annexure A).
- 2. **Incorrect:** According to the school record & report of the concerned circle ASDEO, The statement of the appellant that he has taken the charge & performed duties regularly is baseless & untrue. Further more it is evident from the school record that the two sanctioned posts of the GPS Nehrai Circle Thakoot were already filled by Muhammad Saleem head teacher & Mukhtair V. Teacher, during the year 2008.
(Copy of teachers attendance register GPS Nehrai for the months of 7,8-2008,log book 2008/ & report of Circle ASDEO are annexed as annexure B,C& D)

3. The transfer order of the appellant No: 3345-49 dated 02-07-2015 from GPS Chohan to GPS Faqiro was obtained through fraud. The appellant neither has remained a PST at the previous mentioned stations i-e GPS Nehrai & GPS Chohan. Nor he produced the copy of his transfer order from his first station / GPS Nehrai circle thakoot to GPS chohan circle, Kuza Banda , Whereas the two sanctioned posts of the GPS Chohan were already filled by Pir Habib Shah head teacher & Rustam Khan SPST during the years 2011 to 03-2016 while Babo Khan was working as Para teacher as per school record & report of circle ASDEO Kuza Banda.

(Report of circle ASDEO/ Copy of teacher attendance register GPS Chohan for the months of 6,7/2015 are annexed as annexure E,F).

4. **The appellant** was not appointed through regular process of induction & what even he has got is wrong & he cannot get any benefit of it.

5. **No Comments:**

6. **Para No6 Correct** to the extent of stoppage of salary while remaining Para is incorrect. Infact when it was verified that the appellant through bogus appointment order No-3192-96 dated 06-07-2008 has inducted himself as PST, his salary was stopped & proceeding initiated against him.

(Copy of inquiry and show cause notice & source form are annexed as annexure g,h,i)

7. The appellant is not a civil servant therefore all the grounds are incorrect

GROUND:

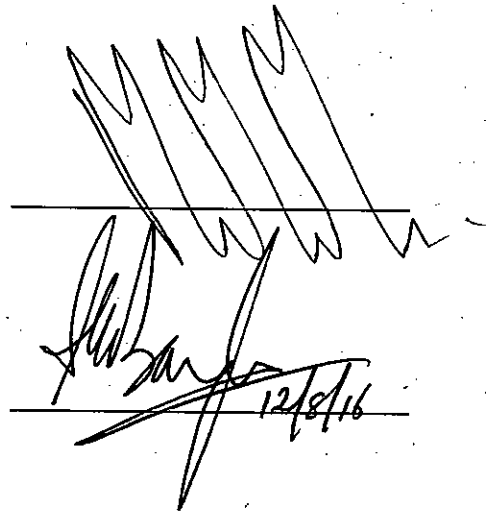
- a. **Incorrect:** The authority has rightly stopped the unlawful payment of the Salary of the appellant.
- b. **Incorrect:** In result of finding inquiry initiated against the appellant show- cause notice is served upon him No:8990-92 dated:09-08-2016.
- c. **Incorrect.** The appellant is not entitled for the monthly salary due to his fake & bogus appointment order No: 3192-96 dated 06-07-2008.and he is liable to be punished.
- d. **Incorrect:** It is the responsibilities of the respondents to stop the unlawful payment.
- e. **Incorrect:** As per reply given above in para "C"
- f. **That** the respondent seeks permission for argue the others grounds at the time of hearing.

Therefore it is humbly prayed that appeal of the appellant may graciously be dismissed with cost.

RESPONDENTS

2. District Education Officer (Male)
Battagram

1. Secretary E & SE Department KPK
Peshawar



Handwritten signatures and dates. The top signature is a large, stylized scribble. Below it is a signature with the date 12/8/16 written next to it.

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA CAMP COURT ABBOTTABAD

Service Appeal No. 133/2016

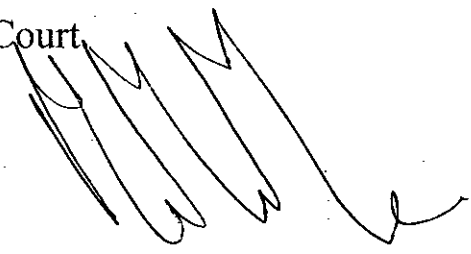
Fazal WahabAppellant

VERSUS

**Government of Khyber Paktunkhwa through Secretary Education
and others.....Respondents**

AFFIDAVIT

I Masoom Khan Assistant District Education officer
Battagram do hereby affirm and declare on oath that content of
Para-wise comments are true and correct to the best of my
knowledge and belief that nothing has been concealed from this
Honorable Court.



**ADEO (Lit :) (Male)
Battagram**

(B)

OFFICE OF THE SDEO (MALE) BATTAGRAM

No 370 /

Dated: 16/05/2016

To,

The DEO (Male) Battagram

Through: SDEO (Male) Battagram

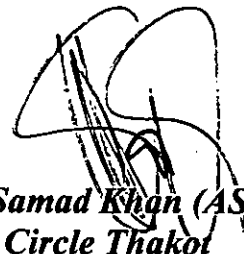
Subject: CLARIFICATION OF FAZAL WAHAB S/O RAHEEM ULLAH AS PST AT GPS NEHRAI CIRCLE THAKOT.

Respected Sir,

Regarding the above cited subject, It is submitted in your honor that the above named person has not remained as a PST at GPS Nehrai circle Thakot during the academic year 2008.

More over Mr. Muhammad Saleem head teacher & Mukhtiar v-teacher have performed duties there as per school record.

Forwarded is
DEO (M) Battagram
in original for
information and
further action please
2



Mir Samad Khan (ASDEO)
Circle Thakot

OFFICE OF THE SPO (M) BATTALION

No. _____ Dated _____ 2018

To

The DEO (Male) Battalion
Through DEO (Male) Battalion

Subject: CLARIFICATION OF FAXA; HAHAR SO RAHEM
ELAH AS PST AT GPS NEHRU CIRCLE THAKOT.

Respected Sir,

Regarding the above cited subject, it is submitted in your honor that the above named person has not remained as a PST at GPS Nehru Circle Thakot among the academic year 2008. More over Mr. Muhammad Zubair head teacher Mukhtiar teacher have performed duties there as per school record.

Mir Samad Khan (ASDEO)
Circle Thakot



رجسٹر حاضرین مدرسین گورنمنٹ پرائمری سکول، ننگر پارک

بابت ماہ جولائی 2008

نام
عہدہ

تعداد
۲۰۶

آصفہ وار خان
CH

نمبر	نام	عہدہ	دستخط	روانگی	آدم	دستخط	روانگی	آدم	دستخط	روانگی	آدم	دستخط	روانگی	آدم	دستخط	روانگی	آدم	دستخط	روانگی	آدم	
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لاکھ پور
17/7/08

تسمہ حضرت	حال	سابقہ	میزان	مال	سابقہ	میزان	مال	سابقہ	میزان	مال	سابقہ	میزان
اتفاقہ												
استحقاق												
بیاری												
میزان												

دستخط سربراہ ناظم

حیضہ حاضرہ مدرسین گورنمنٹ پرائمری سکول، جلیانہ

ابتداء: اگست 2008

نام		تعداد		مہینہ		روز		وقت		مذہب	
نام	تعداد	مہینہ	روز	وقت	مذہب	نام	تعداد	مہینہ	روز	وقت	مذہب
1	1	1	1	1	1	1	1	1	1	1	1
2	1	1	1	1	1	1	1	1	1	1	1
3	1	1	1	1	1	1	1	1	1	1	1
4	1	1	1	1	1	1	1	1	1	1	1
5	1	1	1	1	1	1	1	1	1	1	1
6	1	1	1	1	1	1	1	1	1	1	1
7	1	1	1	1	1	1	1	1	1	1	1
8	1	1	1	1	1	1	1	1	1	1	1
9	1	1	1	1	1	1	1	1	1	1	1
10	1	1	1	1	1	1	1	1	1	1	1
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12	1	1	1	1	1	1	1	1	1	1	1
13	1	1	1	1	1	1	1	1	1	1	1
14	1	1	1	1	1	1	1	1	1	1	1
15	1	1	1	1	1	1	1	1	1	1	1
16	1	1	1	1	1	1	1	1	1	1	1
17	1	1	1	1	1	1	1	1	1	1	1
18	1	1	1	1	1	1	1	1	1	1	1
19	1	1	1	1	1	1	1	1	1	1	1
20	1	1	1	1	1	1	1	1	1	1	1
21	1	1	1	1	1	1	1	1	1	1	1
22	1	1	1	1	1	1	1	1	1	1	1
23	1	1	1	1	1	1	1	1	1	1	1
24	1	1	1	1	1	1	1	1	1	1	1
25	1	1	1	1	1	1	1	1	1	1	1
26	1	1	1	1	1	1	1	1	1	1	1
27	1	1	1	1	1	1	1	1	1	1	1
28	1	1	1	1	1	1	1	1	1	1	1
29	1	1	1	1	1	1	1	1	1	1	1
30	1	1	1	1	1	1	1	1	1	1	1
31	1	1	1	1	1	1	1	1	1	1	1

Head Teacher
Govt Primary School
Nary (Battagram)

دستخط ہیڈ ٹیچر

میزان

03/3 378 3302

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GIPS Aesat

رجسٹر لاگ بیل
گورنمنٹ پرائمری سکول
نیٹ کے (قاریٹا)

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2600-7-10-10

PART II - REMARKS

D12

For Statistics See Page 915

تعداد

REMARKS	Action taken by School Authorities
<p>سالانہ نمائندگی گورنمنٹ ڈپارٹمنٹ سکول میں کیا جائے۔</p> <p>آئیے بتاؤ کہ ہمارے سکول میں کیا کام کیا گیا۔</p> <p>اس سال مدرسہ میں سید فاطمہ بیگم مدرسہ میں تھیں اور ان کا نام یاد ہے۔</p> <p>اور دیگر کئی اور آئیے بتاؤ کہ ان کا نام یاد ہے اور وہ کون کون سے ہیں۔</p>	<p>Page 22/05/2008</p>
<p>تعداد طلباء: A-B - 390 - 474 - 574</p> <p>تعداد اساتذہ: 8/10 - 15/15 - 3/3 - 5/5</p> <p>تعداد کتب خانہ: 10/8 - 15/10 - 3/3 - 5/5</p> <p>تعداد کتب خانہ: 10/8 - 15/10 - 3/3 - 5/5</p> <p>تعداد کتب خانہ: 10/8 - 15/10 - 3/3 - 5/5</p>	<p>تعداد طلباء</p> <p>تعداد اساتذہ</p> <p>تعداد کتب خانہ</p>
<p>تعداد کتب خانہ: 10/8 - 15/10 - 3/3 - 5/5</p> <p>تعداد کتب خانہ: 10/8 - 15/10 - 3/3 - 5/5</p> <p>تعداد کتب خانہ: 10/8 - 15/10 - 3/3 - 5/5</p> <p>تعداد کتب خانہ: 10/8 - 15/10 - 3/3 - 5/5</p>	<p>تعداد کتب خانہ</p> <p>تعداد کتب خانہ</p> <p>تعداد کتب خانہ</p> <p>تعداد کتب خانہ</p>

REMARKS	Action taken by School Authorities
<p>اس وقت میں کل 15 طلباء زیر تعلیم ہیں اور طلباء کا تناسب میں اچھے رہے ہیں۔ یہ سب کو اس کی حالت</p>	<p>لہذا</p>
<p>اس مدرسہ میں کل 10 طلباء زیر تعلیم ہیں تعمیرات کو اگلی سہ ماہی میں شروع کرنے کا ارادہ</p>	<p>ISTA</p>
<p>اس وقت میں کل 8 طلباء زیر تعلیم ہیں ان کا نفعہ آؤں مدرسہ سے ہے۔ دیکھ کر</p>	<p>ISTA</p>
<p>آؤں مدرسہ کے سیمینار اور نصاب مدرسہ تبدیل کرنا دبوں کے مطابق اس وقت ہیں۔ جو مدرسہ کے سہ ماہی کے لیے ہیں اور اس طرح سوائے دس ہیں مدرسہ کی نصابی اور نصابی ترقی کے لیے ریاست کے ترقیاتی مشورہ زمرہ کو ارسال کیا گیا</p>	<p>اصل</p>

Head Teacher
Govt Primary School
Narry (Battagram)

Head Teacher
Govt Primary School
Narry (Battagram)

Head Teacher
Govt Primary School
Narry (Battagram)

PART II - REMARKS

215

For Statistics See Page 94

REMARKS

Action taken by School Authorities

۲۸۹

pull 16/03/2009

مدرسہ کائنات ۹۵۵، منڈی

انہ سے باغیہ نامہ سکول پڑھا گیا ہے جس میں لکھا ہے
 اور اس میں کہ سید صاحب صاحب مدرسہ کائنات اور
 جو کچھ اور آج پڑھا ہے ان کا نام لکھو اور لکھو

۴۷/۴۷	۵۱%	۴/۵	۳۲/۱۳	۱۵۴/۱۱۶	۱۵۴/۸۷	۱۵۴/۱۸
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مخبرت مدرسہ کائنات منڈی سے فرار ہے
 جسے کچھ لگان سے اس سرگرمیاں جاری رکھی ہیں
 (تعمیراتی کاموں کی طرف توجہ دینا اور تیار ہونا
 دیکھنا ہے)

مخبرت مدرسہ

دیکھا گیا ہے

جامعہ کائنات میں کل پانچ طلباء زیر تعلیم ہیں جو کہ منڈی اور راجہ
 میں کمزور صنف کے طلباء ہیں جو کہ کالج میں
 سہولتوں کو رکھی جامعہ میں ترقی دیا جائے
 اس جامعہ میں کل ۱۳ طلباء زیر تعلیم ہیں

لکھی جائے

۳۲/۱۳

PART II - REMARKS

215

For Statistics See Page

REMARKS

Action taken by School Authorities

تمام طلباء کو کلاس میں ترقی دیا گیا ہے۔
 14 طالبہ زیر تعلیم کے کلاسوں میں ترقی دیا گیا ہے۔
 مقررہ وقت کے مطابق امتحان میں اعلیٰ درجے کے طلباء کو
 اعلیٰ درجے میں ترقی دیا گیا ہے۔
 اس اجلاس میں کل 8 طلباء زیر تعلیم کے سب طلباء کو
 تمام طلباء کو باہر لیا گیا ہے۔

1ST A

اس اجلاس میں کل 7 طلباء زیر تعلیم کے
 اس کے باہر لیا گیا ہے۔
 دونوں رہائش گاہوں پر غیر فرائض کے - فحشی روایات کو
 اعلیٰ درجے میں ترقی دیا گیا ہے۔
 اس اجلاس میں کل 8 طلباء زیر تعلیم کے

1ST B

صنیل

نوٹ

Checked
 M.D.O.
 (M) Battagram

Alexis

Head Teacher
 Govt Primary School
 Narry (Battagram)

Alexis
 [Signature]

E 12

OFFICE OF THE SDEO (MALE) BATTAGRAM

No 371-1

Dated: 16/5/2016

To,

The DEO (Male) Battagram

Through: SDEO (Male) Battagram

Subject: DUTY CLAIMED REPORT OF FAZAL WAHAB S/O RAHEEM ULLAH.

Respected Sir,

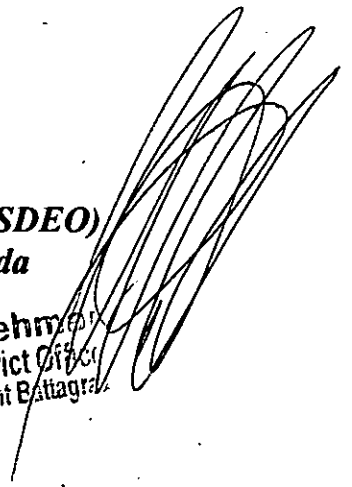
Regarding the above cited subject, It is submitted for your kind information that the above named person has not remained as a PST at GPS Chohan under my supervision during the years 2014-15.

Where as Mr. Pir Habib Shah head teacher, Rustam Khan v-teacher & Babo khan Para teacher have been performing their duties at the said school since 2011 up to date.

*Fazal Wahab is
DPO (M) Battagram
in original. Please
inform me
M. Javed*

Wali Ur Rehman (ASDEO)
Circle Kuza Banada

Wali-ur-Rehman
Assistant District Officer
E&SE Department Battagram



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رجسٹر حاضری مدرسین

وزیران صوبہ سندھ

2015 جوت ماہ

1	پندرہویں نمبر	رجسٹر خان	بالیو خان	INB
عہدہ	P-5-11-T	Sr. PST	Para teacher	(vacant)

روز	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
2	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
3	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
4	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
5	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
6	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
7	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
8	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
9	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
10	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
11	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
12	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
13	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
14	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
15	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
16	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
17	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
18	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
19	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
20	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
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25	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
26	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
27	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
28	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
29	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			
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31	7-30			7-30	RUS	12-35	RUS	7-30		12-35		7-30			

مرخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انقادی	1	2	3	1	4	5			
استحقاق	-	-	-	-	-	-			
بیماری	-	-	-	-	-	-			
میزان	-	-	3	-	-	5			

دستخط ہیڈ ماسٹر

7249810

RUS

پرائمری مدرسین گورنمنٹ پرائمری سکول 2015

نمبر	عہدہ
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نام	عہدہ	تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	
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تسمہ رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقہ												
استحقاق												
بیاری												
میزان												

دستخط ہیڈ ماسٹر

6-18
19

OFFICE OF THE PRINCIPAL GOVERNMENT HIGH SCHOOL CHAPPARGRAM(BATTAGRAM)

No. 314
Dated 03/05/2016

To;
The District Education Officer (M)
Elementary & Secondary Battagram.

Subject; INQUIRY AGAINST THE BOGUS APPOINTMENTS OF PSTs

Reference your office letter bearing endorsement no 4752 dated 19-04-16 about the subject cited above, to do the inquiry against the following two Primary school teachers, The committee approached the SDEO office concerned and collected the documentary proofs and statements for further proceeding (against or in favor of the concerned).

S.No	Name of teacher	Father name	School	P.NO	Appointment order	Transfer order no
01	Fazal Wahab	Rahimullah	GPS Nerai/Chohan	00660390	3192-96 dated 6-7-2008	3345-49 dated 2-7-2015
02	Mehrajuddin	Sirajuddin	GPS Andawali	00349221	8473-78 dated 20-04-2013	3345-49 dated 2-7-2015

FINDINGS

- 1.Fazal Wahab belongs to Village Rashang Tehsil Allai .His appointment order no 3192-96 dated 06-07-2008 does not match with the office dispatch no.
- 2.The two sanctioned posts were already occupied by 1.Muhammad Saleem the Head teacher 2.Mukhtiar the vice teacher during the year 2008.
- 3.The sole/single order is suspicious as single order is rarely found in the advertised posts.
- 4.No appointee of the said name has been found in the staff attendance register.
- 5.The circle ASDEOS have given a written statements (both of Takot and KuzaBanda) that neither the said teacher has done duty nor their name exists in the staff attendance register.
- 6.The said name has not been found, in even in the log book of the school for annual inspection.
- 7.The report of both the ASDEOs has been verified by the SDEO (M) Battagram vide his office endorsement no 200 dated 20-02-2016.He further states that no entry has been found in the attendance register and no relevant record has been found and the local office has not activated the pay of the concerned ,moreover the service book has not been properly maintained in his office.

S/S7
vide order above PR-1-18
PR-201-11-2
272

SDEO
M. B. Khan
11/6/16

920

CONCLUSIONS

After the thorough study of the relevant record and documentary proofs, this committee reaches on the following conclusions.

1. Single appointment looks suspicious, bogus and fake.
2. Some un-cleaned hands were involved in the office of the DEO in such type of mal practices.
3. The said teacher has been appointed through illegal channel.

2. MIRAJUDDIN

FINDINGS

1. He belongs to UC Pashto Tehsil Allai and he has been appointed at GPS AndarWaji UC Bannian Tehsil Battagram.
2. The concerned teacher falls at S.no 21 in merit list while there were four vacant posts at UC Pashto and the top candidates except S.No 01 were accordingly appointed while SsNo 1 was appointed as DM.
3. The appointment order no 8473-76 dated 20-04-2013 does not match with the office dispatch record.
4. The attendance register shows that 02 sanctioned posts had already been occupied/filled by 1. Rafiullah the Head teacher 2. Muhammad Irshad the Vice teacher.
5. The SDEO(M) Battagram has given a clear cut statement vide his office no 200 dated 20-02-2016 that no teacher of such name has been found in the attendance register. He has further stated the salary has not been activated by this office, moreover he has stated that neither service book nor any other relevant record has been properly maintained by his office.

CONCLUSIONS

After thorough study of the relevant record /documentary proofs, the committee reaches on the following conclusions.

1. This sole/single appointment looks suspicious, bogus and fake.
2. The appointment is against the existing appointment policy based on union council.
3. Some un-cleaned hands /black sheep look involved in such type of mal practices.
4. The teacher has been appointed through illegal channel.

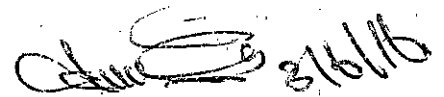
RECOMMENDATIONS

1. Since both these appointments are bogus /fake, so pays should be immediately stopped.
2. They should be immediately suspended from their posts.
3. Legal proceedings should be immediately initiated against them under the service rules.
4. Persons involved in such mal practices may be brought under the umbrella of justice.



AKMAL KHAN

Principal
GHS Chappargran
Distt: Battagram



MUHAMMAD SHOAIB KHAN

PRINCIPAL
GHS Bataela (Allai)
Battagram



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Email: emisbattagram@yahoo.com

BATTAGRAM

Phone # 0997311439 & 0997310670

OFFICE ORDER

In result of transfer letter issued under Endstt: No: 3345-46 Dated 2-7-2015 in r/o the following noted Teachers, Sub Divisional Education Officer (Male) Allai approached to this office vide Endstt: No: 1675/Verification Dated 01-02-2016 for verification of the said Teachers.

Sub Divisional Education Officer (Male) Battagram was asked to verify the said documents through this office letter No: 1573 Dated 8-2-2016 who submitted detailed reply with the following remarks vide Endstt: No: 200 Dated: 20-02-2016.

1. That the Teachers have not handed over the charge of the post at school.
2. That the Documents have not been verified or attested from the circle authority or dealing Assistant.
3. That no relevant record has found in the office.
4. That the salary has not activated by the local office.
5. That the service books have not properly maintained by office.

S.NO	NAME OF TEACHER	FATHER NAME	SCHOOL	P.NO	APPOINTMENT ORDER	TRANSFER ORDER NO
1	Fazal Wahab PST	Rahimullah	GPS Nerai/Choochan	00660390	3192-96 Dated 6-7-2008	3345-49 Dated 2-7-2015
2	Mehrajuddin PST	Sirajuddin	GPS Andarwali	00349221	8476-76 Dated 20-04-2013	3345-49 Dated 2-7-2015

Hence **Enquiry Committee** is hereby constituted, comprising on the following officers to investigate, probe the facts and submit their report within 10 days positively.

1. Muhammad Shuaib Principal GHS Bateela.
2. Akmal Khan Principal GHS Chappargram.

District Education Officer (Male)
Battagram

Dated: 19/04/2016.

Endstt: No: 4752-54/

Copy for information & n/a to the:

1. Principal GHS Chappargram.
2. Principal GHS Bateela.
3. Sub Divisional Education Officer (Male) Battagram & Allai with the direction to cooperate in this regard as and when required.
4. Office Copy.

- Sd -
District Education Officer (Male)
Battagram



(H)
22

011

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM**

SHOW CAUSE NOTICE

1 Muhammad Riaz Swati, District Education Officer (Male) Battagram as competent authority under the Khyber Pakhtunkhwa Government servants (Efficiency & Discipline) rules, 2011, do hereby serve you Mr. Fazal Wahab PST GPS Nehrai/Chohan presently working at GPS Faqero Tehsil Allai District Battagram as follows:

- a) As per findings of enquiry committee constituted vide this office order Endstt. NO. 4752-54 dated 19/04/2016 your appointment order is fake and bogus as
 - i. Your appointment order NO. 3192-96 dated 06/07/2008 does not match with the office dispatch record.
 - ii. The two sanctioned posts were already occupied by Muhammad Saleem and Mukhtiar during the year 2008.
 - iii. The sole/single order is suspicious as single order is rarely found in advertised posts.
 - iv. No appointee of your name has been found in the staff attendance register.
 - v. The circle ASDEOs have given a written statement (both of Thakot & Kuza Banda) that neither you have performed duty nor your name is exist in the staff attendance register.
 - vi. Your name has not been found even in the log book of the school for annual inspection.
 - vii. Reports of ASDEOs have been verified by SDEO (M) Battagram vide his office Endstt. NO.200 dated 20/02/2016. He further stated that no entry has been found in the attendance register and no relevant record has been found and his office has not activated your pay, moreover your service book has not been properly maintained in his office.
- b) In exercise of the power conferred by the Khyber Pakhtunkhwa, Govt: servant (Efficiency & Discipline) rules, 2011, the Competent Authority is hereby pleased to serve you with the instant show cause notice regarding your fake and bogus appointment with the direction to submit your defence in writing within (07) Seven days of the issuance of this notice.
- c) In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defence to offer and ex-parte decision will be taken against you.

COMPETENT AUTHORITY

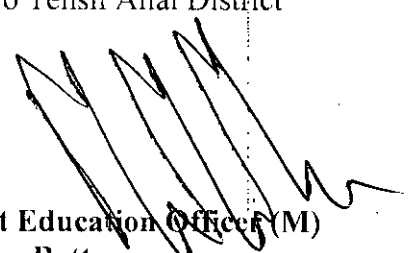
Mr. Fazal Wahab PST GPS Nehrai
presently working at GPS Faqero
Tehsil Allai District Battagram

Endst: No. 8990-92 /

Dated Battagram, the 9 / 8 /2016

Copy of the above is forwarded to:

1. PA to Director E&SE KPK Peshawar.
2. SDEO (M) Allai with the direction to serve the show cause upon the concerned official.
3. Mr. Fazal Wahab PST GPS Nehrai presently working at GPS Faqero Tehsil Allai District Battagram.


District Education Officer (M)
Battagram

PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

GS&FD NWFP 569 -- F S 3000 Parts of 100 L 10 12 2008 125

Form: PAY02

Date

Page No.:

OFFICE OF THE SDEO (M) Alai

FOR THE MONTH OF 08 2005

DDO Code (Cost Center) 1317033 Description SDEO (M)

Personnel Number 00660350 Employee Name Rajal Malik

National ID Card No.

Grade (Pay Scale Group) 14 P-S-T

Salary Status Start Stop

GENERAL DATA CHANGE ¹³			CHANGE IN PAYMENTS/DEDUCTIONS ¹⁷					Effective Date ²¹	Remarks ²²
Info Type	Field ID's	New Contents ¹⁶	Wage Type ¹⁸	Amount					
				Ruppes ¹⁹	Paisa	Adj ²⁰			
							01/08/15	Pay may be stopped please which was wrongly released in 07/2005	

Pay stopped
17/8
DA 8 BM
District Accounts Officer
BATTAGRAM

(Signature)
Sub-Div. Em. Officer
(Male) Alai Battagram

Prepared By²³

Audited/Checked By²⁴

Entered/Verified By²⁵

Li/ (23)

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

وکالت نامہ

قیمتی

کورٹ فیس

خلیبر مختونخواہ سرورس ٹریڈنگ کمپنی پشاور

بعدالت جناب

ایمانت

منجانب

حکومت K.P وزیرہ

فضل وہاب

بنام

سرورس اپیل

نوعیت

باعث تحریر آئیکہ

ایمٹ آباد/پشاور

مندرجہ بالا مقدمہ عنوان میں اپنی طرف سے پیروی و جوابدہی مقام

تعمیرات مثل ایڈووکیٹ سپریم کورٹ

بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے اگر مقدمہ کچہری کے کسی اور جگہ سماعت ہونے پر یا بروز کچہری کے اوقات کے آگے پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ داریاں اس کے واسطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرداخت صاحب مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کراتے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد ثالثی و راضی نامہ فیصلہ بر خلاف کرنے اقبال دعویٰ کا اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری ایک طرف درخواست حکم اتناعی یا ڈگری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا ایگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا ایمر مشرک بجائے اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے کہ صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمے کی پیروی نہ کریں۔ اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے۔ کہ سندر ہے۔ مضمون مختار نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد

العبد

العبد

ATTESTED & ACCEPTED

Tanveer Ahmed Mughal

Tanveer Ahmed Mughal
Advocate Supreme Court of Pakistan
Gold Medalist in Law
3, Lawyer's Chamber, Abbottabad

۲۔ لائبریز چیئرمین
لائبریز بازار داہلہ پٹ آباد

تعمیرات مثل ایڈووکیٹ سپریم کورٹ

فضل وہاب ولد جمیع السہاسن الانی
نیلو