QF (

31.07.2018

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Arguments heard and record perused.

Vide our detailed judgment of today placed in connected Service Appeal No. 603/2013 "titled Mst. Shamia Bibi Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others respondents, the present appeal is accepted, the impugned order is set aside and the appellant is reinstated in service. However, the respondents are at liberty to conduct de-novo inquiry within a period of three months from the date of receipt of this judgment. The intervening period shall be treated as leave without pay. Parties are left to bear their own costs.

<u>ANNOUNCED</u>

31.07.2018

(AHMAD HASSAN) MEMBER

(MUHAMMAD HAMID MUGHAL) MEMBER

File be consigned to the record room.

None for the appellant present. Addl: AG alongwith Mr. Daud Jan, Supdt for respondents present. Written reply on behalf of respondents no. 3 and 4 not submitted despite repeated opportunities, therefore their right of defense is struck off. To come up for arguments on 27.12.2017 before D.B.

(Ahmad Hassan) Member

27.12.2017

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Addl: AG for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come for arguments on 27.02.2018 before the D.B.

Member

Chairman

27.02.2018

Appellant with counsel and Additional AG alongwith Mr. Daud Jan, Superintendent for the respondents present. To come up for arguments alongwith connected appeal No. 603/2016 Mst. Shamia Bibi on 12.04.2018 before the D.B.

Member

hairman

12.04.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Superintendent for the respondents present. To come up for arguments alongwith connected appeal No. 603/2016 before the D.B on 14.05.2018.

Member

hairman

03105.2017

Clerk to counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl. AG for the respondents present. Written reply submitted on behalf of respondents No. 1 and 2. Cost of Rs. 100/-also paid and receipt thereof obtained from the learned counsel for the appellant. Remaining respondents written reply not submitted despite extension of last opportunity and cost of Rs. 100/-. Another last opportunity is extended subject to payment of further cost of Rs. 500/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments of respondents No. 3 and 4 and cost of Rs. 600/₅ on 13.07.2017 before S.B.

(Ahmad Hassan)

Member

13.07.2017

Clerk of the counsel for appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents also present. Written reply on behalf of respondents No. 1 & 2 have already submitted. Representative of respondents No. 3 & 4 are not in attendance nor written reply on their behalf submitted despite extension of last opportunity. Another last opportunity is extended subject to payment of further cost of Rs. 500/- which shall be borne by respondents No. 3 & 4 from their own pockets and notice be also issued to respondents No. 3 & 4 with the direction to direct their representatives to attend the court on the next date and submit written reply. To come up for written reply/comments and cost of Rs. 1100/- on behalf of respondents No. 3 & 4 on 28.08.2017 before S.B.

(Muhammad Amin Khan Kundi) Member 22.12.2016

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. Last opportunity granted. To come up for written reply/comments on 30.01.2017 before S.B.

(MUHAMMAD AAMIR NAZIR) MEMBER

30.01.2017

Clerk counsel for appellant and Mr. Daud Jan, Superintendent alongwith Mr. Muhammad Adeel Butt, Additional AG for respondents present. Written reply by respondents not submitted despite last opportunity. Learned Additional AG requested for further time for submission of written reply. Last opportunity further extended subject to payment of cost of Rs. 100/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments positively on 14.03.2017 before S.B.

(ASHFAQVE TAJ) MEMBER

14.03.2017

Clerk to counsel for the appellant and Mr. Daud Jan, Sudpt. alongwith Addl. AG for respondents present. Written reply and cost not submitted by respondents. Representative of the respondent-department stated at the bar that case of the appellants for reinstatement in service was under process and would be finalized before the next date of hearing. Requested for adjournment. Request accepted. To come up for written reply/comments and cost on 03.05.2017 before S.B.

(AHMAD HASSAN) MEMER 14.06.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PST when removed from service vide impugned order dated 18.02.2016 on the allegations of willful absence where-against she preferred departmental appeal which was not responded and hence the instant service appeal on 07.06.2016.

That the appellant was not absent from duty as the alleged period of absence was period of vacation. That no enquiry in the prescribed manners was ever conducted.

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 23.08.2016 before S.B.

Chairman

23.08.2016

Counsel for the appellant and Mr. Muhammad Numan, AO alongwith Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 3.11.2016 before S.B.

Chairman

03.11.2016

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 22.12.2016 before S.B.

Member

Form- A FORM OF ORDER SHEET

Court of		
Case No	604/2016	

	Case	No. 604/2016
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1.	0 7 /06/2016	The appeal of Mst. Abida Nawaz presented today by Mian Asif Amam Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2	13,6,2016	This case is entrusted to S. Bench for preliminary hearing to be put up there on. 14-6-16
·		CHARMAN
-		!
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	a.	

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 604 of 2016

Mst. Abida Nawaz

<u>VERSUS</u>

Additional

Agency

Education Officer & others

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4.	Copies of the appointment	"A & B"	9-10
;	laters and posting order.		
5.	Copy of the impugned order	"C & D"	11-12
	dated 18-02-2016 and show		
i i	cause published notice "		
6.	Copy of Departmental appeal	"E"	13
7.	Copies of the attendance	"F"	14-39
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8.	Copies of the salary bill	"G"	40
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	and departmental		
	correspondences.		
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Appellant

Through

MIAN ASIF AMAN

Advocate, High Court,

Peshawar

Off: T-30, 3rd Floor Biloor Plaza, Peshawar Cantt. Cell # 0313-9185077.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 604 of 2016

Khyber Pakhtukhwa Service Tribanal

Diary No. 589

Dated 7-6-20/6

ABIDA NAWAZ D/O NAWAZ KHAN EX- AT TEACHER AT
GOVERNMENT GIRLS PRIMARY SCHOOL, RAWAZ SADDA, LOWER
KURRAM, KURRAM AGENCY. APPELLANT

VERSUS

- ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL KURRAM, SADDA, KURRAM AGENCY.
- 2) DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT, 1 PESHAWAR.
- 3) AGENCY ACCOUNT OFFICER KURRAM AGENCY.
- 4) GOVERNMENT OF KHYBER PUKHTOON KHWA, THROUGH ", SECRETARY EDUCATION, CIVIL SECRETARIAT, PESHAWAR.

...... RESPONDENTS.

APPEAL AGAINST THE office ORDER No 3374-78

DATED 18-02-2016 PASSED BY RESPONDENT NO.1

WHEREBY THE APPELLANT HAS BEEN REMOVED

FROM SERVICE DUE TO LONG ABSENCE FROM DUTY.

<u>PRAYER</u>

ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED OFFICE ORDER NO 3374-78 DATED 18-02-2016 OF RESPONDENT NO.1 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE ORDERED TO BE REINSTATE IN SERVICE WITH ALL BACK BENEFITS ACCORDING TO HER SENIORITY.

Respectfully Sheweth:

1) That the Appellant No was appointed ARABIC Teacher at Government Girls High School Sadda, on 15-12-1999, where she was performed her duty in the worst situation of militancy and sectarian in Kurram agency and for this reason her previous school was

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destroyed in sectarian war, and she was later on due to destruction of School building deployed & directed to performed her duty at Government Girls Primary School, Rawaz Sadda, Lower Kurram, Kurram Agency, and since then performed her duty with honesty and full devotion. (Copies of the appointment later and transferred/deployed order attached as annexure A & B, Respectively).

- That the Appellant was surprise and consternation came to know about her removal from service impugned order date 18-02-2016 and show cause notice published in daily news paper Mashriq on 02-02-2016, when the Appellant after winter vacation joined her duties, in March 2016. (Copy of the impugned order dated 18-02-2016 and show cause published notice are attached as Annexure "C & D").
- 3) That feeling aggrieved from the impugned order dated 18-02-2016 the Appellant preferred the departmental appeal. (Copy of Departmental appeal is enclosed as Annexure "E").
- 4) That the departmental appeal has not been answered and decided despite the lapse of statutory period of time, therefore, Appellant filed present appeal against the impugned order dated 18-02-2016 of respondent No.1, which is against the law, facts and principles of justice on the following grounds interalia:

GROUNDS:

A. That the impugned order is based on malafide, ill will, retribution, illegal and void abi-intio.

- B. That exparte action has been taken against the Appellant and they been condemned unheard.
- C. That no charge sheet and show cause notice was delivered to the Appellant.
- That the Appellant is serving with all Zest and Zeal with the entire satisfaction of her superiors, performed her duty with religious devotion, therefore, never ever absented from her official duties, which further established from the contents of the attendance registered which presumption of accuracy and truth is extended. (Copy of the attendance registered attached as annexure F).
- D. That Appellant punctual and regularly throughout her duties, which reflects her attendance registered dully kept by the competent authority, and never ever absented from her service, which facts further evident from her pay bill were received Appellant every month, had the Appellant been absentees would the respondent No 1 had prepared her salary bill. (Copies of the salary bill attached as annexure G).
- That malafide of the respondent No 1 is overtly Ε. established from the factum that against dishonest conduct of the respondent No 1, the appellant & Other Colleague had moved applications prior to issuance of impugned order dated 18-02-2016. wherein serious charges of corruption raised before competent misconduct were applications authority.(Copies of the and departmental correspondence attached as annexure H to L).

- (ty)
- F. That the malafide and ill will of respondent No 1 was so high peak that he in winter vacation issued show cause notice through publication daily Mashriq and thereafter removal order were also made in winter vacation, whereof Appellant were not in knowledge, this all smacks of retributive intentions and overt malafide on the respondents.
- G. That as affirm above the winter in Kurram agency is most severe, further more the Appellant leave in scattered far long villages, therefore, Appellant could not get any knowledge of impugned proceeding initiated at the back of ht Appellant malafidely, hence due to explained reason the Appellant could not submits replies of show cause notice.
- That ulterior motive of the respondents No 1 self Н. evident from the fact that show cause notices issued through publication against 53 persons but removal impugned order were passed in reference of 17 persons including Appellant, meaning thereby that all those who greased the palms of respondent no 1 were left off the hock, and those who did not obliged him were removed from services just to satisfied personal vendetta of respondent No 1, and more astonished the impugned order dated 18-02-2016 against he facts and ground reality, because one iqbal hussain at serial No 9 impugned order already retired a year ago and received his pension benefit, and not aware the posting of the Appellant from Government Girls Middle School Tendo Government Girls Primary School Rawaz Sadda vide office order dated 23-03-2012.

- (5)
- I. That allegation of the absentee is not corroborated by the official record or any medium of unimpeachable evidence, hence alleged charges baseless and viod liable to be struck down.
- J. That the Appellant has been condemned unheared in contravention of salutary doctrine of "Audi alterm partum".
- K. That no inquiry has been conducted to prove the allegations before awarding the major punishment which this amounts to major deviation from the rules of service laws, hence impugned order is not sustainable in the eye of law.
- L. That before taking such drastic penal action respondent No 1 did not take pain to seek factual input from concerned headmaster/principal who is immediate officer, this all reflects that all the impugned proceedings were made in cursory and slipshod hasty manner without following the rules and regulations showing some personal interest of respondent no 1.
- M. That under the law the show cause notice must be issued to every official but herein joint show cause with blanket allegations have been made followed by one pen stroke removal from services impugned order has never been intention of law, needs to be struck down.
- N. That any other grounds will be raised at the time of the arguments with prior permission of this Honorable Tribunal.

(2)

It is, therefore, prayed that On acceptance of this appeal, the impugned Office order No 3374-78 dated 18-02-2016 of Respondent No.1 may kindly be set aside and the Appellant may kindly be ordered to be reinstate in service with all back benefits according to her seniority

Dated 06-06-2016

Through

MIAN ASIF AMAN Advocate, High Court,

Appellant

Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____ of 2016

Mst. Abida Nawaz

VERSUS

Additional

Agency

Education Officer & others

AFFIDAVIT

I, Abida Nawaz D/O Nawaz Khan Ex- At Teacher At Government Girls Primary School, Rawaz Sadda, Lower Kurram, Kurram Agency Agency do hereby solemnly affirm and declare on oath that the contents of this Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

DEPONENT

Identified by

MAIN ASIF AMAN

Advocate Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____ of 2016

Mst. Abida Nawaz

VERSUS

Additional

Agency

Education Officer & others

Address of the parties

APPELLANT

ABIDA NAWAZ D/O NAWAZ KHAN EX- AT TEACHER AT GOVERNMENT GIRLS PRIMARY SCHOOL, RAWAZ SADDA, LOWER KURRAM, KURRAM AGENCY

RESPONDENTS.

- 1) Additional agency education officer, lower & central kurram, sadda, kurram agency.
- 2) Director of education fata, fata secretariat, peshawar.
- Agency account officer kurram agency.
 - 4) Government of khyber pukhtoon khwa, through secretary education, civil secretariat, peshawar.

Dated 06-06-2016

Appellant

Through

MAIN AISF AMAN

Advocate, High Court,

Peshawar.

mnexure

INTMENT

Consequent upon Schootion by Soldetica Cormittee, the followaby candidates are temporarily appointed on Rs. 1605/-PM fixed in BPS-9 plus usual allowances as admissible under the rules, with effect from the date of their toking over charge in the schoole noted against their names:-

:	S.No Name of Candidate with Father's Name	Posted at	Remarks
	1. Fatma Qamar D/O Qamar Din	GGMS Manduri	Against vacant AT/OT post.
	2. Abida Mawaz Khan	GCHS Sadda	Against vacant AT/OT post.
	Said Marjana D/O Nadir Khan		Agaimst vacant AT/OT post.
	4. Bibi Rabia D/O Tanzoor Ausz	-	7 MI/OT DODO!
	5. Bibi Sakima D/O S.Ghulam Hussain	GGMS Alamaber	Against vacant NT/OT post.
	6. Bibi Zulikha D/O Rohmat ali	COMS Spagala	Against vacant AT/OT post.

Note:

- Charge reports should be submitted to all concerned.
- The appointment of the candidates are being made purely on temporary basis and are liable to termination at any time without assigning any seasons. In case they wish to resign their post they shall have to give one month prior notice or forfiet one month pay in lieu thereof.
- Their original Educational Certificates/Degrees, date of birth & domicile certificates should be checked before they are handed over charge of the post and attest copies thereof be kept on record of the school/office.
- They should be sent to the Agency Surggon concerned for Medical examination the day on which they report their arrival for duty and no pay should be drawn for, unless and untill they produce their health and age certificate from the said Surgeon.
- The pay scale and service rules whould be subject to revision in accordance with the orders to be passed by the Government of NWFP from time to time.
- 6. Their verification rall of character and antecedents should be got verified by the concerned authority and the same may be kept on office record.
- They should not be handed over the rgs of the post if they are below 18 years or above 33 years age.

next page 2

TTESTED

- If they fail to report their arrival for taking over charge within 15 days a report to this effect should be sent to this Directorate:
- The untrained campidates will not claim graded pay till they 9. acquire the prescribed qualification for the post of Arabic :
- 10. They will not apply for transfer till completion of normal tenure at their present station,
- 11. Their certificates be got verified from the concerned authori . by the Agency Education Officer/Headmaster,

(Dr.Sher Alam Khan)' Director of Education FATA NWFP Peshawar

Turra. 1.ted Pesh the 15/12-199

Copy forwarded for information to the: -

- 1. Regional Director of Education FATA Kohat Region.
- 2. Agency Education Officer Kurram Agency at Parachinar.
- 5. Headmaster concerned.
 - 4. Candidates concerned.
 - 5. PA to DE(FATA).

6.9. Personal files.

Mos Alusta Manag #7 58MS Tendo menura You are desceled to perform your days (10) at agps Rowing Sedda is your nearest sline due to Crises in Central Neurren. Till further order

23/2012
Add: Agency Education Officer
L&C Kurram at Sadda

ATTESTED



ADD: AGENCY EDUCATION

OFFICE SADDA KURRANI AGENCY

PHONE, 0926-520674 FAX 0926520674

eanve

No: <u>3374-78</u> /Edu:

Dated Sadda: the: 18/02/2016

REMOVAL FROM SERVICE.

On the fulfilling of all codal formalities the following teachers/Class Ivs are hereby removed from their service due to their long absence from duty with immediate effect.

Note: Entry to this effect should be made in their service books.

S#	Name	Desig:	School
1	Sadiqa	PET	GGMS Bilyamin
2	Maryam Faroog	CT	IHC Gogani
3	Shehnaz -	TT	GGPS Barari
-4	Abida Nawaz	AT	GGMS Tindo
5	Farah Deeba	PST	GGPS Bagzai
6	Shamia Bibi ,	PST	GGMS Badama
V 7	Irfanullah 🖟	PST	GPS Hamish Gul Kali
8	Latif Shah	PST	GPS Had Mella
9	Iqbal Hussain	PST	GH9 Bilyamin
10	Jasim Khan	Peon	GHS Shah Ibrahim
11	Samad Hussain 🐣	Ch	GPS Talo Kunj
12	Muzafar Dawood	Ch:	GGPS Muzafar Kot
133	Sher Muhammad	Ch:	GHS Dogar
14	Fazal Rehman	Behish:	GHS Dogar
15	Awal Shah	Ch:	GPS Mirdo Tang
16	Zainullah	Swp:	GHS Paloseen
17	Sulaiman	N/Q	GHS Paloseen

Add: Agency Education Officer Lower & Central Kurran Sadda

NO_ <u>3374-78</u> /Edu dated_<u>18/02/2016</u> Copy for information to the

- 1. Director of Education FATA Peshawar.
- 2. Political Agent Kurram Agency.
- 3. Agency Account Officer Kurram Agency.
- 4. Head Masters / Teachers Concerned.

Add: Agency Education Officer Lower & Central Ktuyam Sadda

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Record PST Rashid PST 3/3/016

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المناف المنافقة

المِنْ (3) كَذِيرُ GCMS' PET المريد (2) بالمريد (3) المريد (3) ال بايكن (4) نيرند وكن (5) GGMS DM كنان (4) نازند وكن (4) نازند وكن (4) (6) مرم وروق HC 'CT كال (7) مرواقاتي مير " CMC (6) وبدائدة GGPS Truj مند(9) مندان الم GGPS "Truj معتركت (10) عبادل الم GGPS معتركت الم اGGPS'PST مِسْمِة لَكُلُ (15) (روايد GGPS'PST) المائل قال ك (11) يراي الما ン/(19)、沙GGPS 「PST」(はした)(16))(からGGPS 「PST) رية GOPS 'PST' څونۍ (20) زايوه اكبر PST' GOPS (L.L.) كل جيدولا GPS'PST: الله (22) عَلَى GGMS'PST والد (22) والد (23) GGPS'PST اريكي (24) كامران عان GPS PST من أخرار (25) كرون الله CUPS PST من سكل ME'PSTIZ JU(28) LIS'PST JW (27) JGGFS'PST/ (20) فاريد وُون الإستان والمنظمة ول (31) كَيْمَانَ وَنِهِم وَرِي OHS كُرِي (32) مِنْمَ قَانِ يَرِينَ BHS (33) مَدْمِينَ (36) مَثْرِها وَرِيكِ اللهِ GCPS مَثْرِكُ (37) يُرِكُدُ وَكُيلُو GHS (وَكُونَ (35) فِيْلُ وَاللَّهِ (ط المراز (30) فرار (40) (40) (40) (40) (40) (40) (41) (40) (41) (41) (41) (41) (41) ينم ذان بوكيداد ت GP وكي فمرة (44) بالن وزير جيكيا و GP وركي فمرك (ندا) ميان خان يَدُنِي (47) عَدْرَ (16) كَنْبِكُل بِرَكِيار GPS يُرِونُو (47) عَلَمَالُ بِالْ بَوْلِيَاد GPS مِنْ (نور)-يداين يركيدر GP وافرداد مر (49) ميدانيد فاو قركيدار GPS كوال (50) اول شاه يكيدار OPE برودك (51) ادى يكيدار GPS يودو (52) تريدا الله دير CHS (دي (53) سانيان : نسب ة سرر Gils بارين اين أير تعلى سنة نا حالي غيرها من زي جس كا ماه يراتب سب كو آب ك كرول المولند ، ك المدلى م ينوره المحدة المراكزيش الجنى التركيش افر سه ادرال ك مح كوجانت كي في حمل بيرزه داول منتج أغفا خدوفتر أبر ومنعي ما مرزو كر غير ما مري كيا دهه كُن أَن كَ إِن مِن أَبِ مِن أَمِن مِن وَكُمِن البِلمَا أَحْرَكُ إِلَيْ قُرِونِ فِي أَمِن مِن أَمِن المرام الماء كما أَن وكى كان ات من عرودون كاراندا إيش الميني البيش ألميمين أفير لورايد سنرل كرم مددك و ان در اعبار در ان ماع ملا فير ما عرف وي كرين عرف الله المين عرف عين الله المين المين الله المين المين المين وي در اعبار در اعبار در ان ملا فير ما عرف وي كرين عرف المين المين المين المين المين الله المين المين المين الم ز ان (E&U) روي على مراجع المراجع المرجع

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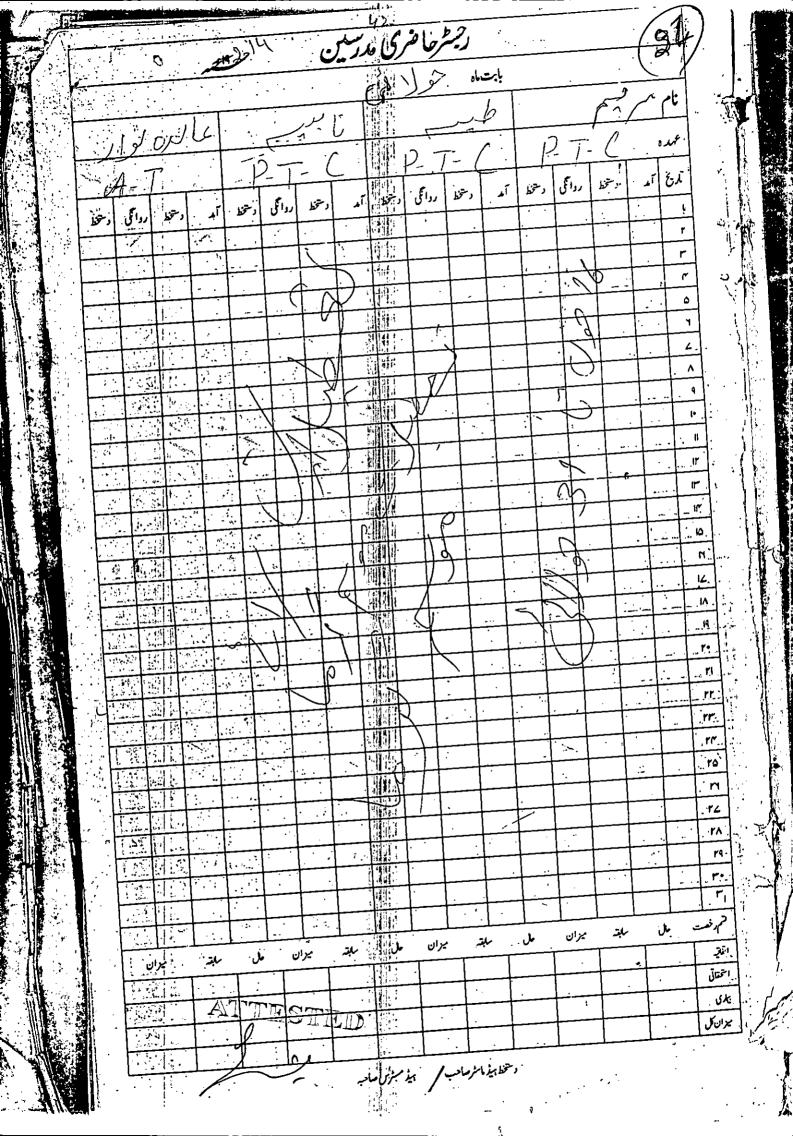
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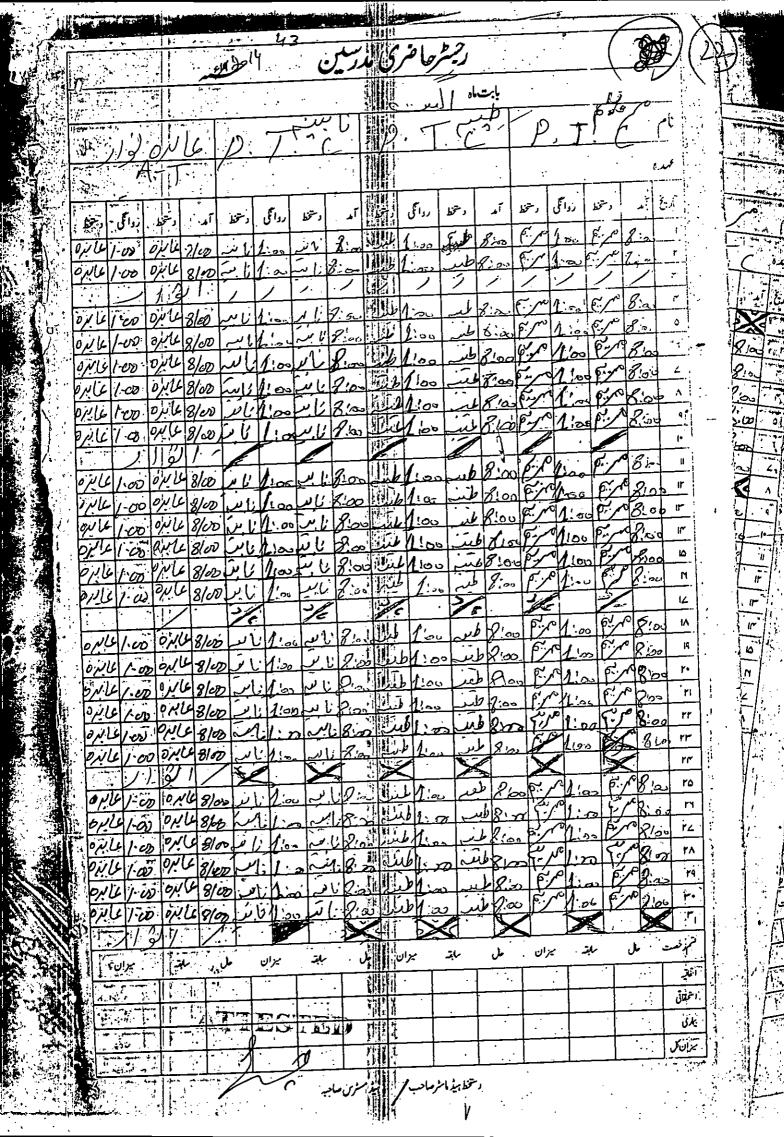
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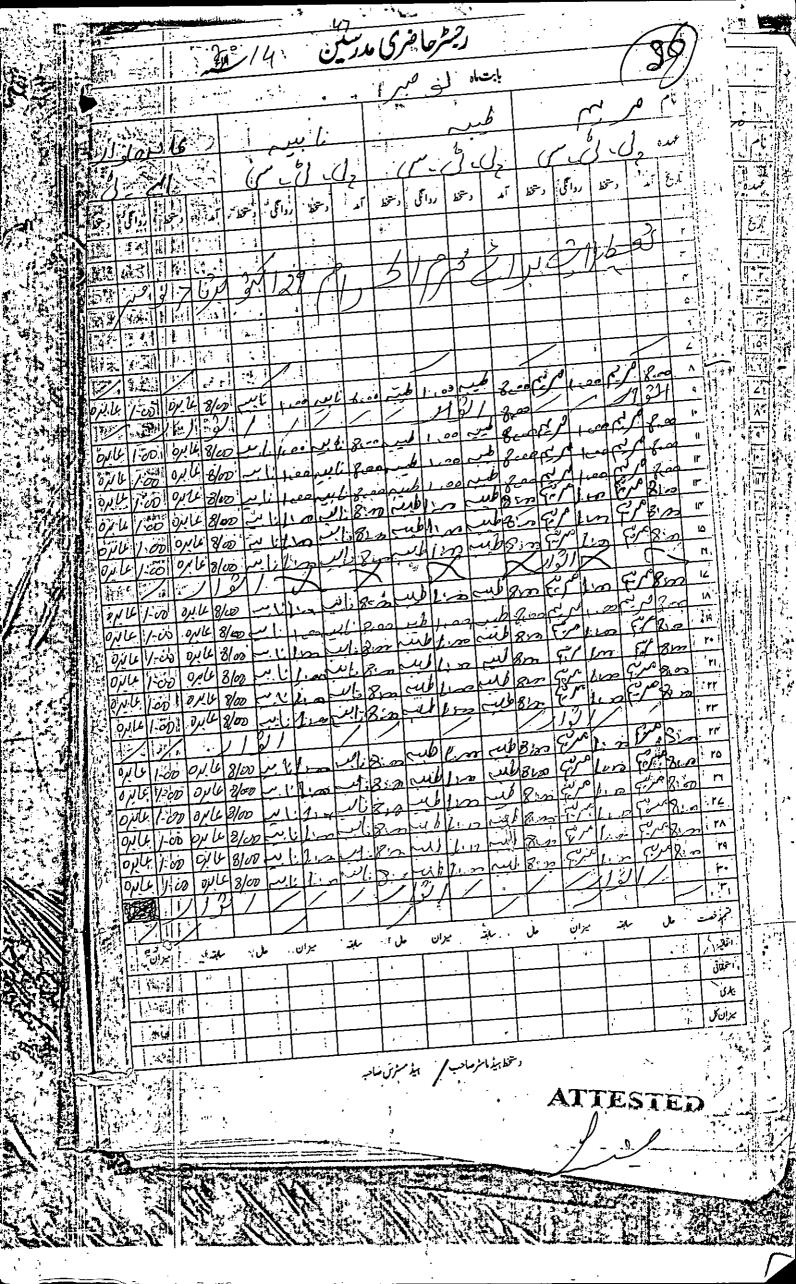
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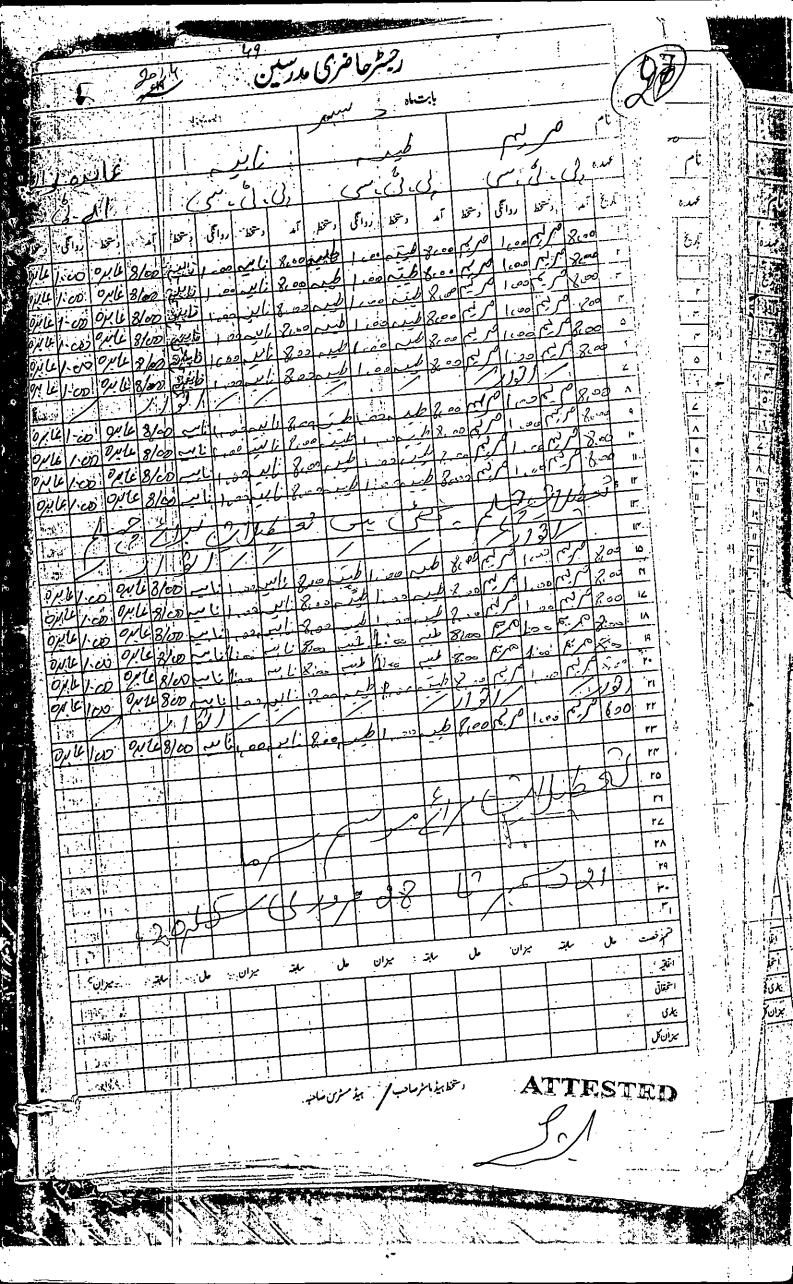


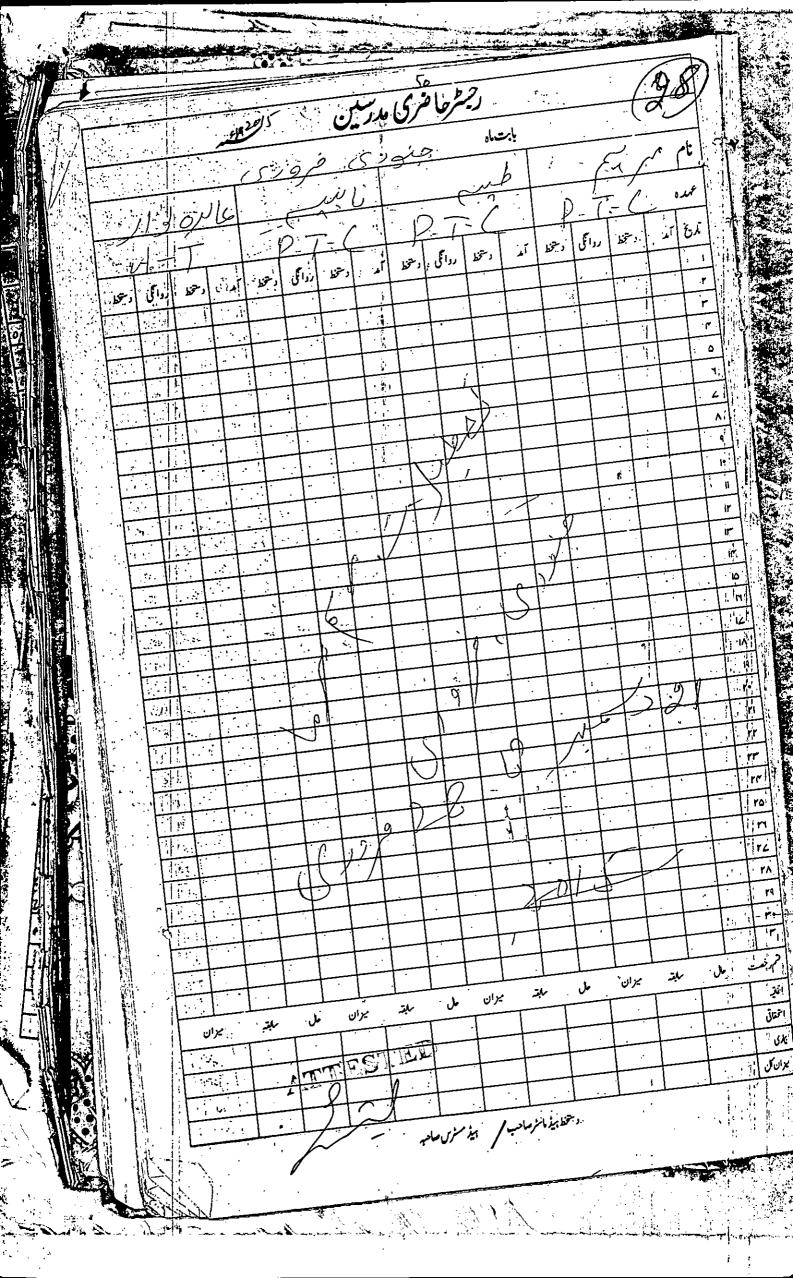


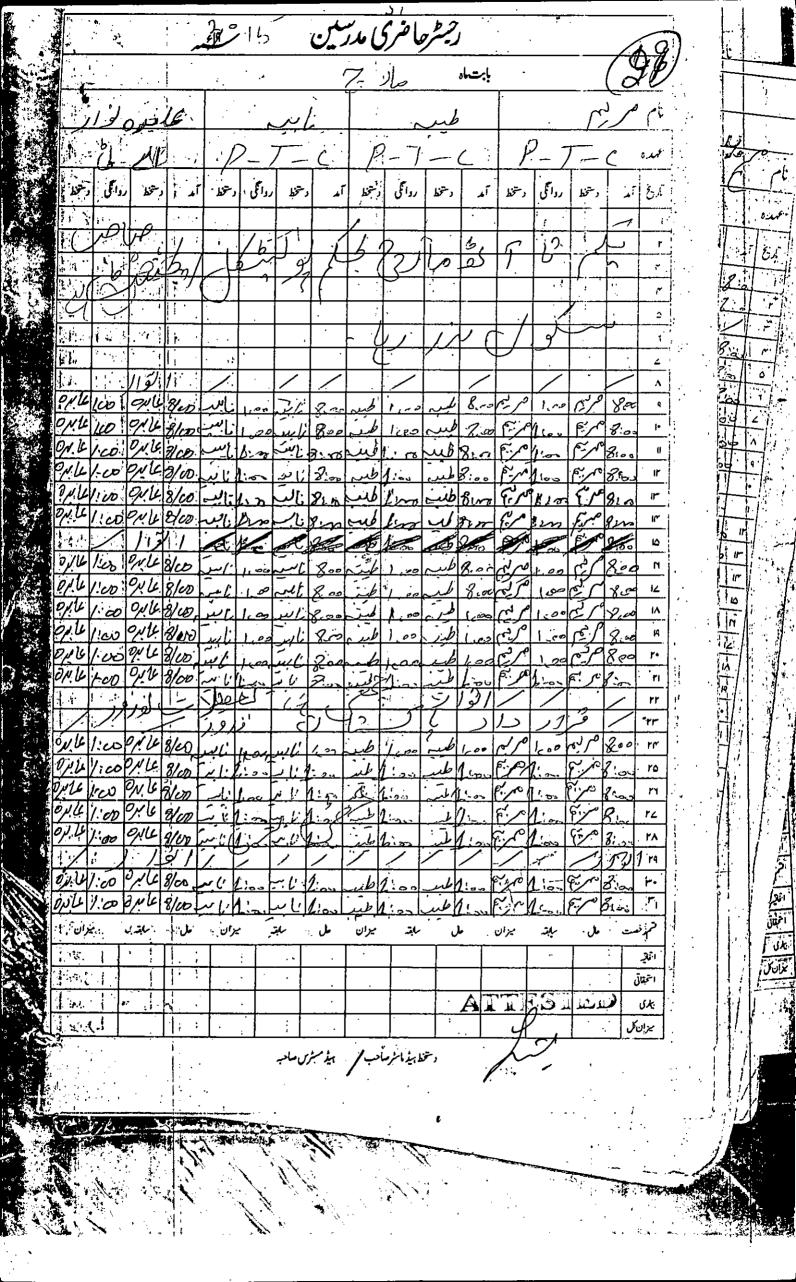
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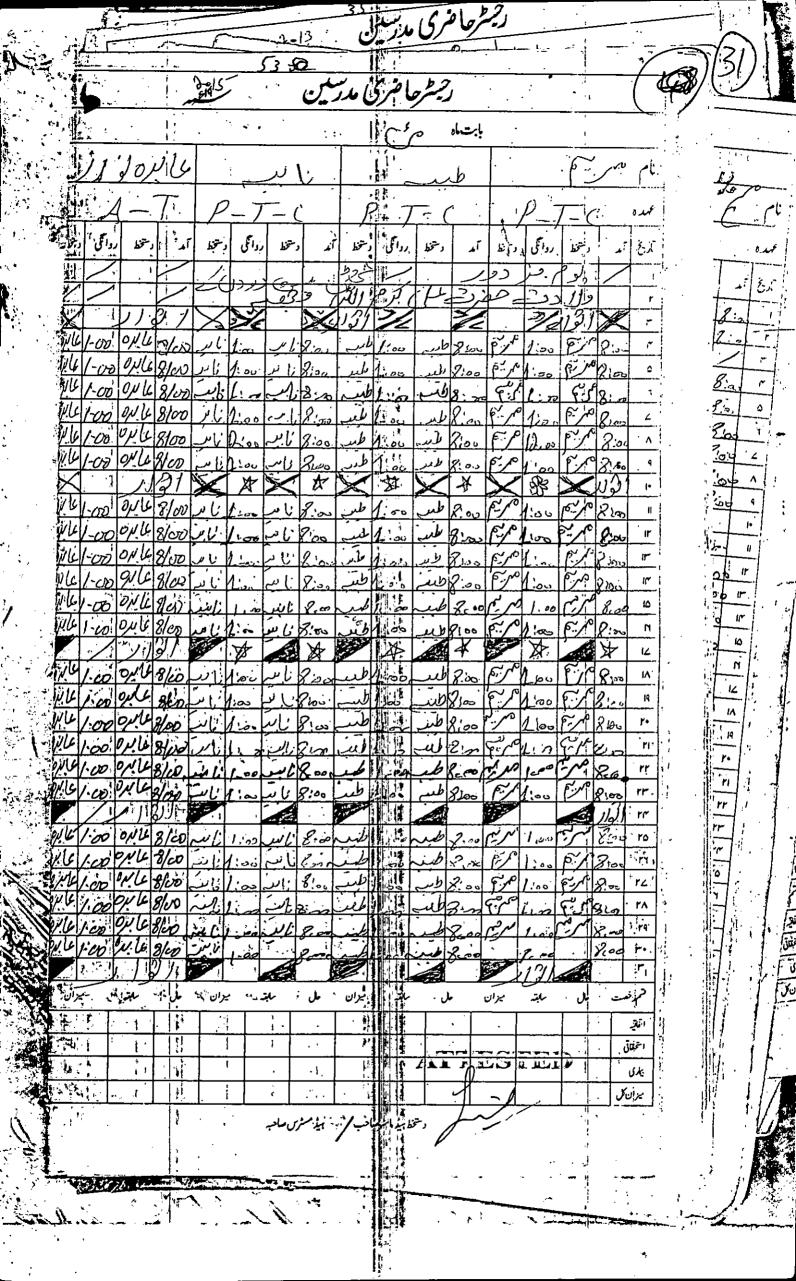


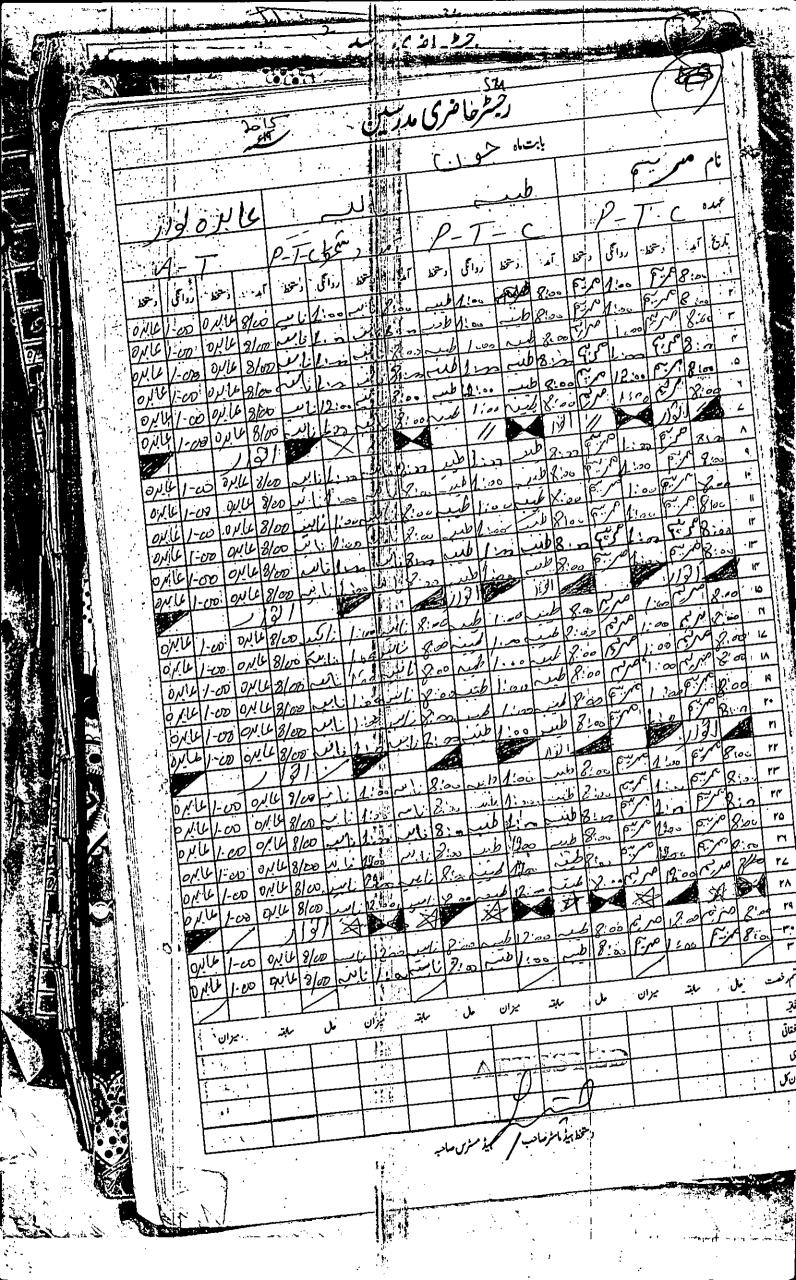












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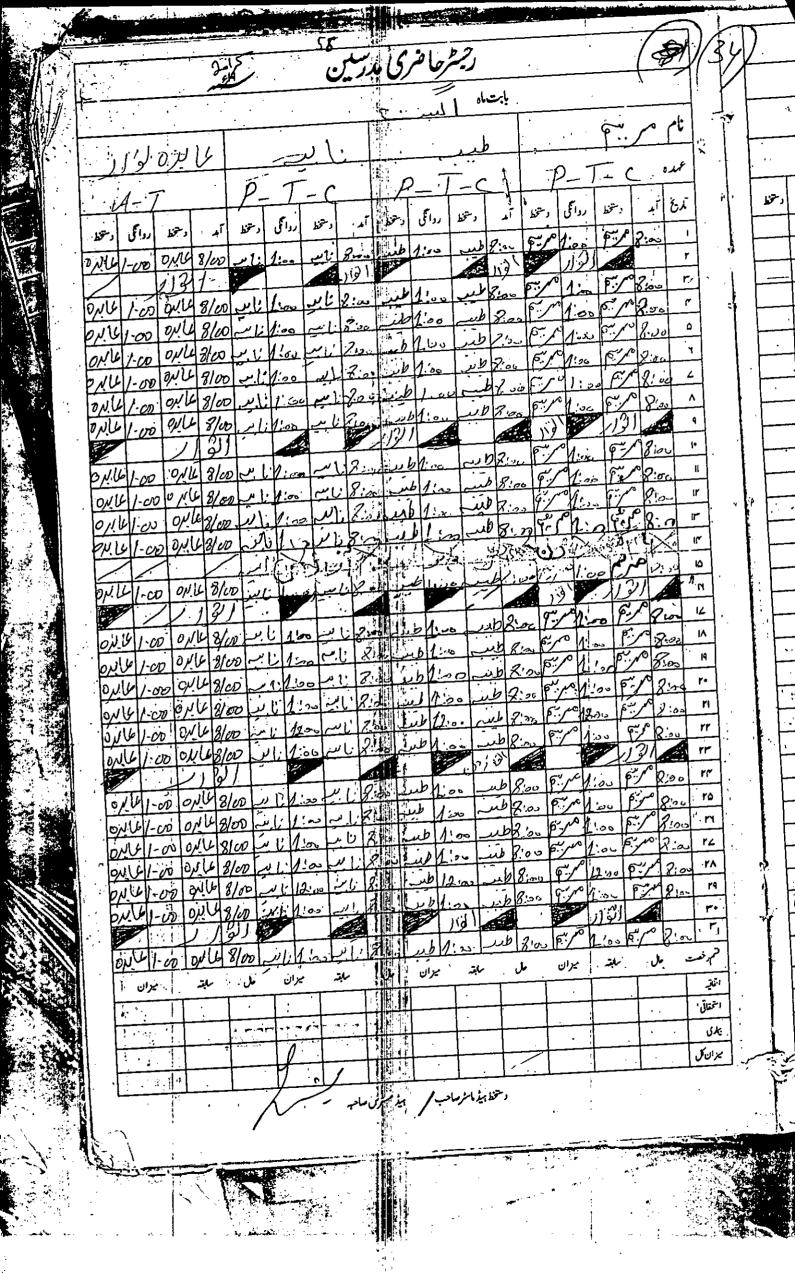
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۳۰ جمرته انتو التمتال علای

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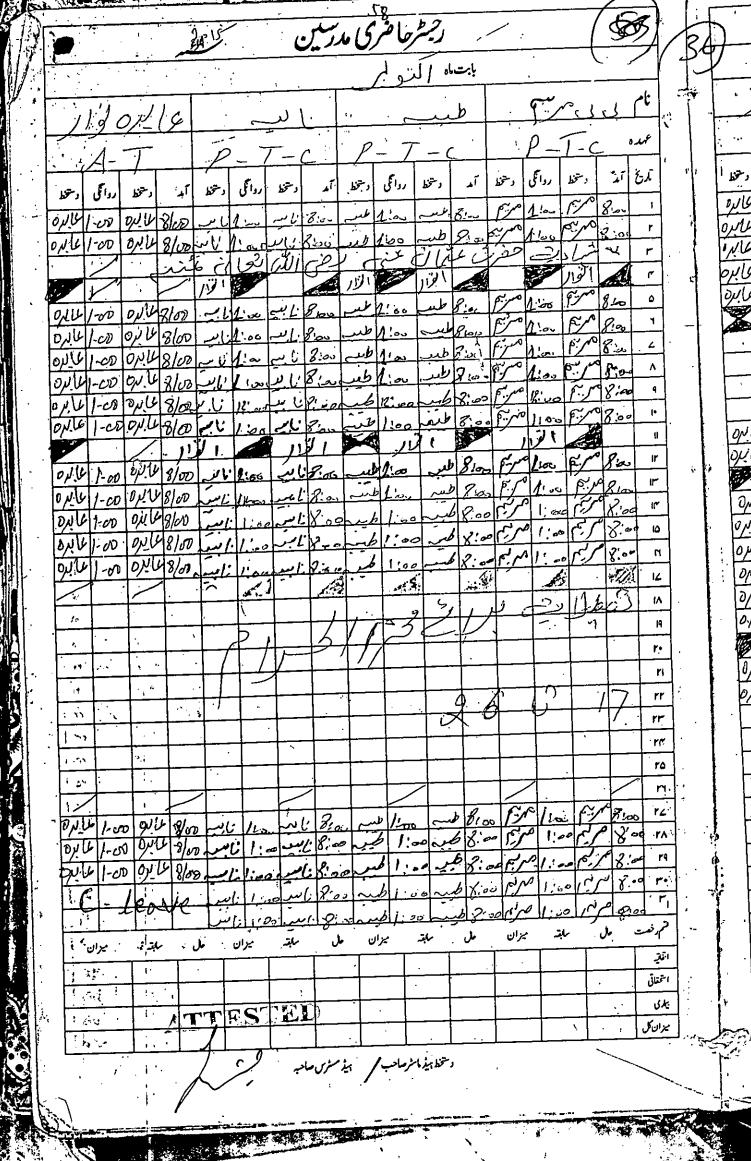
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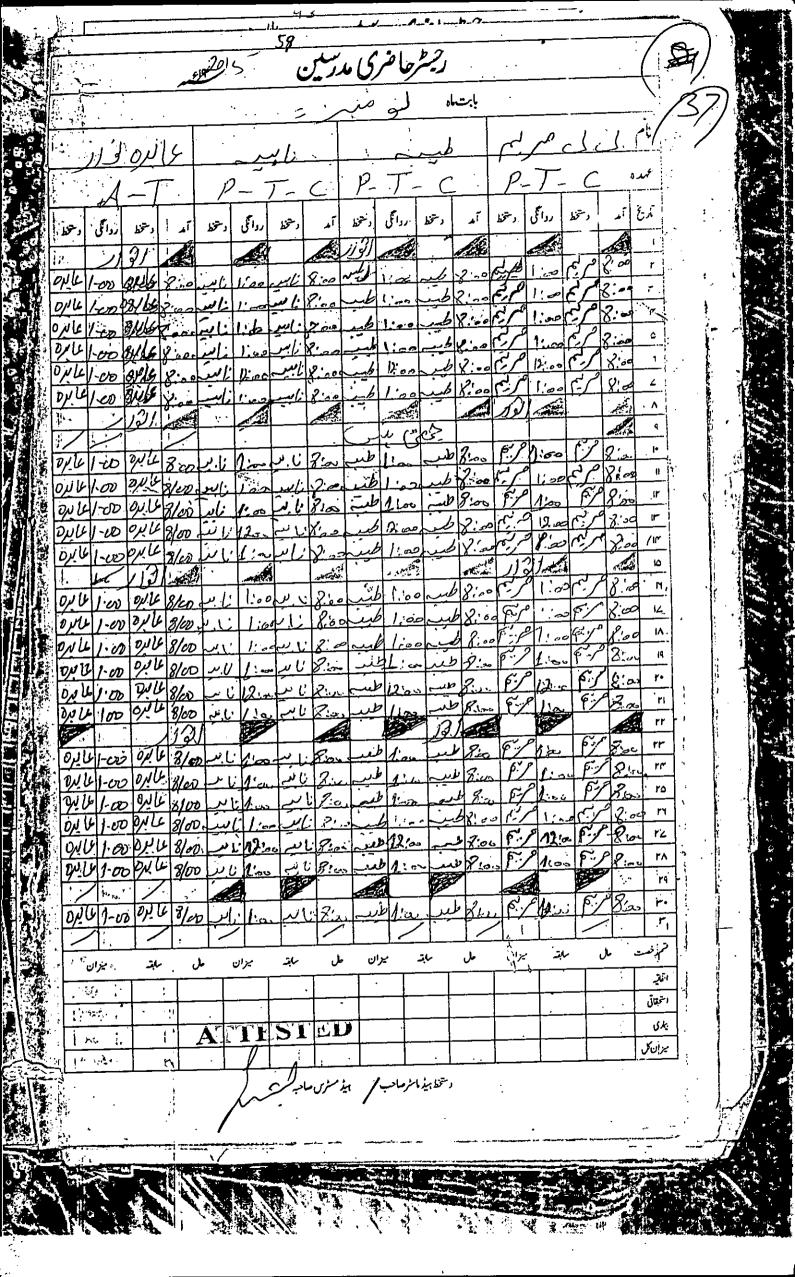
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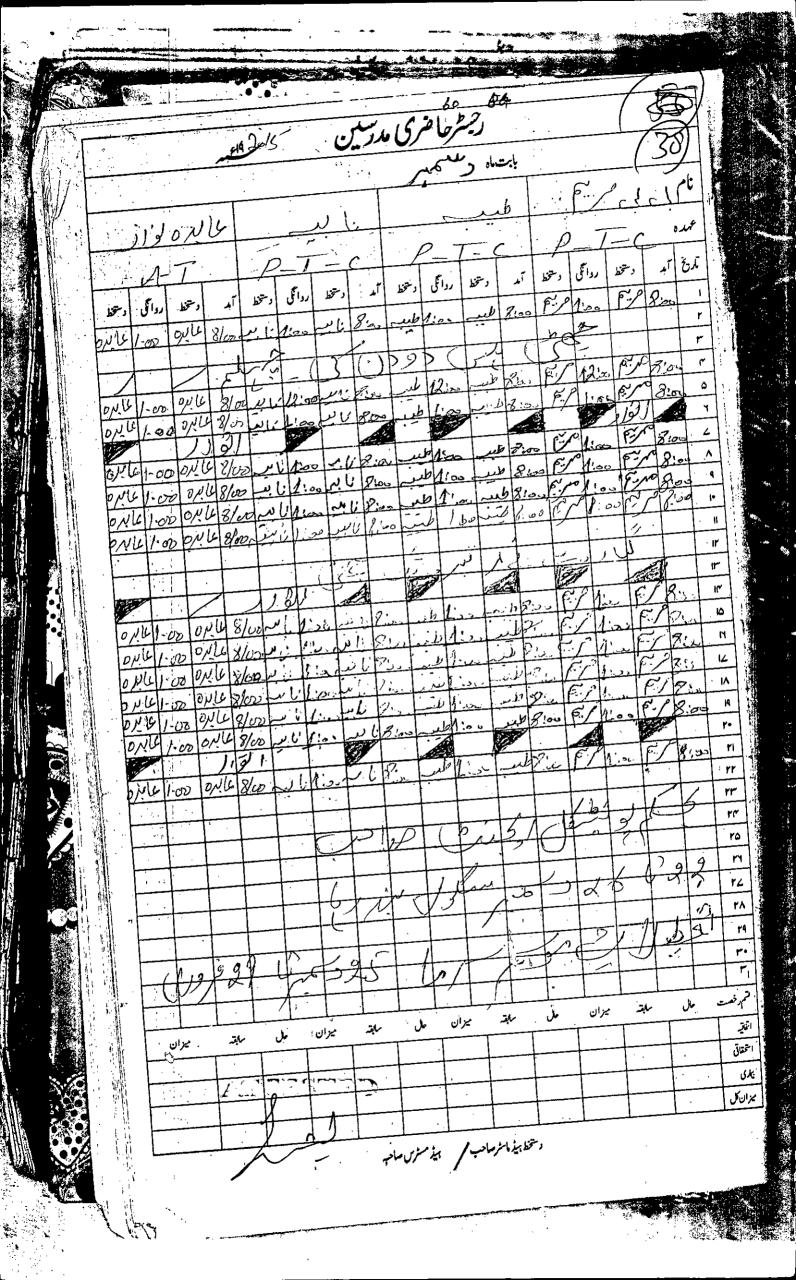
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Kurram at Ara C

P Sec:001 Month: January 2016 KM1117 -ADDITIONAL AGENCY EDUCAION Min. Of K.A & N.A & S.F.R Buckle: Pers #: 00674704 Name: Abida Nawaz NTN: GPF #: ARABIC TEACHER CNIC No.2130274801125 Old #: 30274801125 GPF Interest Applied Active Permanent KM1117 -CK1 14 PAYS AND ALLOWANCES: 19,820.00 0001-Basic Pay 1,476.00 1000-House Rent Allowance 1300-Medical Allowance 1,500.00 1,700.00 1528-Unattractive Area Allow 1898-Income Tax Adjustment 61.00 1948-Adhoc Allowance 2010@ 50% 3,790.00 2148-15% Adhoc Relief All-2013 2,206.00 1,471.00 2174-Adhoc Relief Allow-2014 2199-Adhoc Relief Allow @10% 1,982.00 Gross Pay and Allowances 34,006.00 DEDUCTIONS: GPF Balance 72,962.00 Subrc: 1,775.00 3661-E.E.F (Exchange) i00.00 180.00 3701-Benevolent Fund (Exchange) 115.00 3704-Group Insurance (Exchange) 3711-Addl Group Insuranc (Exch) 13.00

Total Deductions

2,183.00

31,823.00

D.O.B

LFP Quota:

15.12.1977

NATIONAL BANK OF PAK

17 Years 00 Months 027 Days

1775-9

1 2 - 1 / W W. L

Kurram at Ara C

S#:

Pers #: 00674704 Buckle:

Name: Abida Nawaz

ARABIC TEACHER

CNIC No.2130274801125 GPF Interest Applied

14 Active Permanent

PAYS AND ALLOWANCES:

2199-Adhoc Relief Allow @10%

P Sec:001 Month:December 2015 KM1117 -ADDITIONAL AGENCY EDUCAION

Min. Of K.A & N.A & S.F.R

NTN: GPF #:

Old #: 30274801125

> -CK1 KM1117

> > 1,982.00

Gross Pay and Allowances DEDUCTIONS:

GPF Balance 71,187.00 36,845.00

Subrc:

Total Deductions

2,183.00

34,662.00

D.O.B

15.12.1977

LFP Quota:

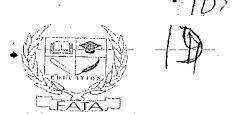
NATIONAL BANK OF PAK

16 Years 11 Months 027 Days

1775-9



6745567 \$ 675523 3/14 501845 40 11/14 675827 J



FATA SECRETARIAT DIRECTORATE OF EDUCATION

Warsak Road Peshawar No._____dt: でみつき /10

A-12/Majid Gul I/G H/M

То

The Director

Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Subject:

COMPLAINT/ENQUIRY *

Memo

against Mr. Majid Gul SET working as I/C Headmaster GHS Minatoo, Kurram Agency and to submit that Mr. Majid Gul SET working as AAEO Lower/Central Kurram Agency was transferred to GMHS Sadda vide this Directorate Endst: No. 11224-29 dated 18-7-2009. As per report of the Principal GMHS Sadda Kurram Agency, the above named teacher does not perform duties regularly (Copy enclosed) and his pay has been stopped vide this Directorate Endst: No. 7528 dated 31-5-2010 (Copy enclosed) while working as AAEO Lower Kurram, he was allegedly involved in financial corruption and irregular deduction of monthly salaries from the female community school teachers (Copies of complaint attached).

In view of the above, it is requested that disciplinary action may be initiated against the accused teacher being an employee of provincial cadre under intimation to this office.

DY: DIRECTOR EDUCATION FATA SECRETARIAT PESHAWAR

Endst: No. Mをうちーくい

Copy forwarded to:-

1 Addl: AEO, Lower/Central Kurram

2 Principal GMHS Sadda, Kurram Agency

3 P.A to D.E FATA

AFTESTED

DY: DIRECTOR EDUCATION FATA SECRETARIAT PESHAWAR

<u>- جيف سير ٿري فاڻا-</u>

ورخواست برائے کاروائی طلبا ،کی حال پررهم کرنا اورمجیدگل SET کے خلاف کاروائی کرنا

جناب والاشان. ﴿ مَنْ الْدَالْبِيَامُ مِنْ مِومًا كَدِيرِكُل صده رفت مِن AAEO يوست برتها الرانجارة الدِّينتال AAEO بحي تفا8 ماريخ 2015 وأو كا تباول ورنه عنت حمالي سئول کمن تحسین SET کیا ٹیا ہے۔ ٹمرز کے 25/04/2015 تک اُس نے سکول کا شکل تکہ نہیں دیکھا ہے۔ جو ہمارے بچول کساتھ شخت ناانصافی اورظلم ہے۔ مجیدگل یمنے سے عادی ہے۔ابطور ثبوت اس کا سابقہ ریکارڈ میش کرنا جا ہتا ہوا ہے۔

ﷺ وقرآ) المعلق المسابع المعربية المسام المسابع الم مرے مبر NO 60 dated 06/03/2015 اسکے غیر حاضری کے فلاف ڈائز یکڑا بچوکیشن فاٹا کو دیا ککھا گیا (دیا بھی ہے گی **معتور آ**

🥞 اینکے بعد و دوالیس صد و دفتر میں آنے کا کوشش کرر ہاتھا۔اور گمنام ڈائزی کرنے کا سہار الیتا ایڈیشنل ایجو کیشن آ ضرنے ایک بار پھرا سکے خلاف ڈائزات ایجو كَشْنَ فَا لا تُواكِد نَطَيْمِرِ: NO: 709-11 dated 03/05/2010 كَوْرِ لِينَ اللهِ وَطَالِقِي عَلَيْهِ }

NO:11665-66 dated المركز المركز المليز الأميز المليز المدينة أن الأكثر المركز المركز

03/08/2010 كَ وَرَضِعَ كَارُوالْيَ مَلِيمَ وَلِلْكَهَا (وَلِي تَصَلَّى عَلَى مُولِدُ وَقَلَ جناب والاشان:

مجیهٔ کُلُ وایک بار پُفرسیای پیشتهٔ پنای حاصل دو کی کاروائی تو دور کی بات بهاس کوایک بار پُھرایڈیشنل AEO مقرر کیا۔اوردو(2) سابوں میں اُس نے اوئزسنٹر لئٹر م کے تعلیمی ڈھانے کے کوکروڑوں کے عوض اُتباہ کیا۔اسا تذ و کوگھروں جیٹھا کرففٹی فغلی تخواہ پرمجبور کرتا تھا، وہ دورہیمی گز راجب ایک دفعہ پھر اُس کوھا کی کول بکن تبدیل کیا میاتو تا بی کی باری هانی یکول بکن کوفعیب بین ملی ،اور ربی سی **کر**یمان اورا کیا جائے گا۔

تاريخ 25/04/2015

ا اہلیان بگن ٹرم ایجنسی

خطرکی نقل بھجے گئی

(۲) سیکرٹری وشل سیکرٹری

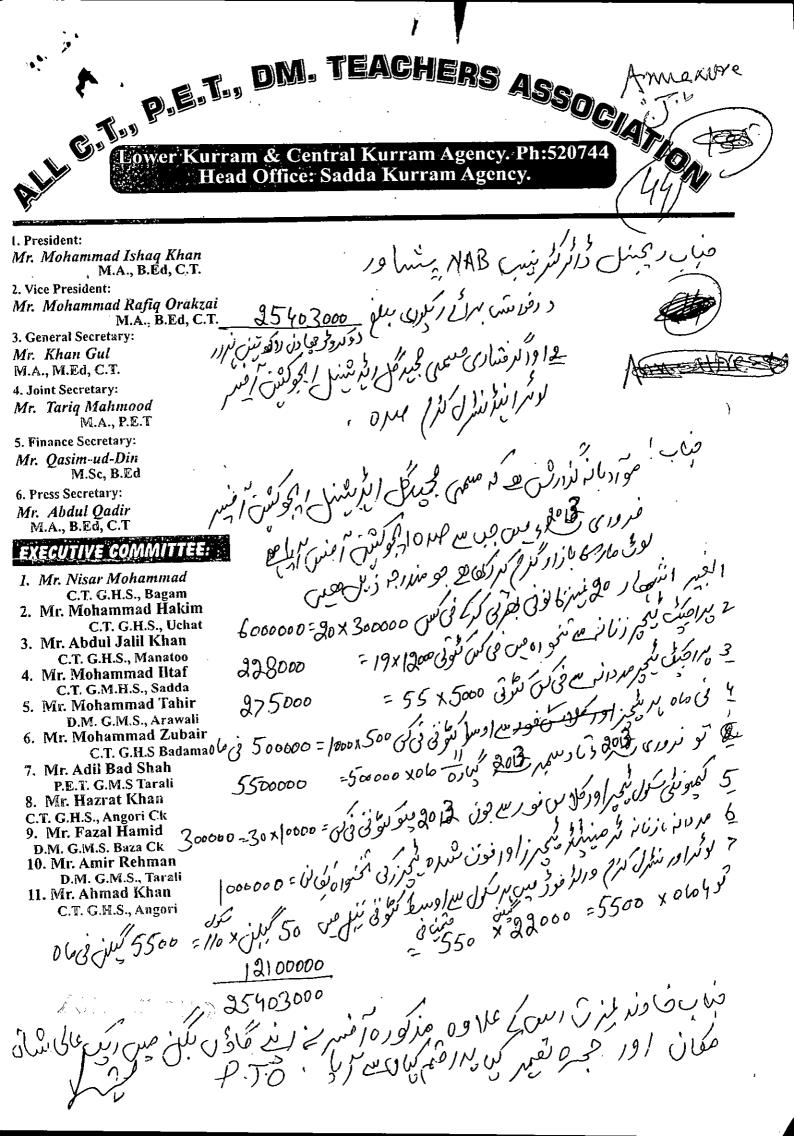
(۱) وْائْرَكُمْ ايجوكِيشْن فايا -

(٣) اسٹین پاٹیکل ایجن لونز گرم

(٣) الشكل ايجنت كرتم

ATTESTED

1 01



1306700 10 July of Charles 1000 (in cion & obse) signo lon End by his 0 4 160/ 2 103) orde 319/6 (319/6/01/6/) 20 m/2/1) c/ (201) 20 - c/ (201) c/ m/2/2) 20/16/2/L/W/ Y/ Good Will Me 5-1-2014 1 نقل درورس بها بي 2 Linguin AAB Cinding 2131 از لمرارانس

ATTESTED

بعد السف م سرس ريم يمري والدال م معان ممالا __ عن مانجور ريامتي مرمي ميمر گورنز بنام رم 1/1/2/20 med) (1/1/2) دعویٰ مقدمه مندرجيمنوان بالامين اپن طرف سے واسطے بيروي وجواب دہي وکل کاروائي متعلقه و 🖊 أن مقام مع من الله عن المعنى المعنى والله والله مقرر کرے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ، وگا۔ نیز وكيل صاحب كوراضى نامه كرنے وتقر رثالت و فيصله برحلف ديئے جواب دى اورا قبال دعوى اور بسورت ومرى كرفي اجراءاورصولى چيك وروبيارعرضى دعوى اور درخواست برتسم كى تقديق زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری میکطرفہ یا بیل کی برا مدگی ادرمنسوخی نیز دائر کرنے اپلی محرانی ونظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ ندکور کے کل ما جزوی کاروائی کے واسطے اور وکیل مامختار قانونی کواییے ہمراہ مااسیے بچائے تقرر کا اختیار ہوگا۔اورصاحب مقررشدہ کوبھی وہی جملہ ندکورہ باا ختیارات حاصل ہوں مےاوراس کاساخت برواختة منظور تبول موكا_دوران مقدمهي جوخر چدد مرجاندالتواع مقدمه كسبب سے وموكا_ کوئی تاریخ بیشی مقام دوره پر ہویا صدیے باہر ہوتو وکیل صاحب یا بند ہوں ہے۔ کہ بیروی ند کورکریں ۔لہذاوکالت نامہ کھنڈیا کے سندر ہے ۔ .20/6 ______. /- je!