

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 603/2016

Date of Institution ... 07.06.2016

Date of Decision ... 31.07.2018

Mst. Shamia Bibi D/O Isam Khan, Ex-PST Teacher,  
Government Girls Middle School, Baddama, Central Kurram, Kurram Agency.  
... (Appellant)

VERSUS

1. Additional Agency Education Officer, Lower & Central Kurram, Sadda,  
Kurram Agency and three others.  
... (Respondents)

MR. MIAN ASIF AMAN,  
Advocate

--- For appellant.

MR. KABIRULLAH KHATTAK,  
Additional Advocate General

--- For respondents

MR. AHMAD HASSAN,  
MR. MUHAMMAD HAMID MUGHAL

--- MEMBER (Executive)  
--- MEMBER (Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Our this judgment shall also dispose of instant service appeal as well as Service Appeal No. 604/2016 titled "Mst. Abida Nawaz Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 605/2016 titled "Sher Muhammad Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 606/2016 titled "Fazal Ur Rehman Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 607/2016 titled "Mst. Maryaum Farooq Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 608/2016 titled "Muzaffar Daud Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three

others", Service Appeal No. 609/2016 titled "Awal Shah Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others" and Service Appeal No. 604/2016 titled "Samad Hussain Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others" as common question of law and facts are involved in all the appeals.

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

### FACTS

3. The brief facts of the cases are that the appellant and others while serving in Education Department were proceeded departmentally and major penalty of removal from service was imposed on them vide impugned order dated 18.02.2016. Feeling aggrieved an undated joint departmental appeal was filed by them, which was not responded within the stipulated period, hence, the instant service appeal.

### ARGUMENTS

4. Learned counsel for the appellant argued that on the allegations of absence from duty a notice was published in daily "Mashriq" on 02.02.2016 directing the appellant and others to assume the duty. Its merits to mention here that the notice was published during the winter vacations in Kurram Agency. He further clarified that all the educational institutions were closed for winter vacations from 25<sup>th</sup> December 2015 to 29<sup>th</sup> February 2016, in Kurram Agency, as it evident from the attendance register available on record. He further contended that in the aforementioned notice name of 53 employees were mentioned but in the impugned order major penalty of removal from service was imposed on only 17 employees; hence, the impugned order was discriminatory and against the spirit of Article-25 of the Constitution of Islamic Republic of Pakistan. The respondents have failed to correctly mention the exact date from which the appellant and others were

absent. Various requirements prescribed in the rules were not observed, so the impugned order was void ab-initio.

5. Learned Additional Advocate General argued that all the affected civil servants were required to file separate departmental appeal but in the instant case joint departmental appeal was filed in violation of rules. Major penalty of removal from service was imposed on the appellant and others after observance all codal formalities.

### CONCLUSION.

6. On the allegations of willful absence from duty, the appellant and others were proceeded departmentally and upon conclusion, major penalty of removal from service was imposed on them vide impugned order dated 18.02.2016. It is strange that the respondents failed to mention the exact date from which the appellant was absent from duty. Learned Additional AG when confronted on this point, candidly conceded that the record was silent on this score. He was further confronted on the point that the impugned order was issued and the period of absence showed in the impugned order related to winter vacations but he was unable to give an convincing reply. Despite opportunities on the previous date of hearing the respondents failed to produce record about service of notices at the home address of the appellant and others employees. It has also not been clarified that why action were taken against only 17 employees whereas names of 53 employees were mentioned in the notice published in daily "Mashriq" on 02.02.2016. Action taken by the respondents appeared discriminatory and violative of Article-25 of the Constitution of Islamic Republic of Pakistan. It can be stated safely inferred that the procedure laid down in the rules was not followed by the respondents before issuing the impugned order and as such the appellant and others were condemned unheard.

7. As a sequel to above, the appeals are 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 may be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.



(MUHAMMAD HAMID MUGHAL)  
MEMBER



(AHMAD HASSAN)  
MEMBER

ANNOUNCED  
31.07.2018

31.07.2018

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

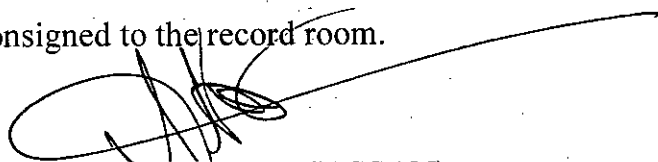
Vide our detailed judgment of today placed on file, the appeal is accepted, the impugned order is set aside and the appellant is reinstated in service. However, the respondents are at liberty to conduct de-novo inquiry within a period of three months from the date of receipt of this judgment. The intervening period may be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

31.07.2018



(MUHAMMAD HAMID MUGHAL)  
MEMBER



(AHMAD HASSAN)  
MEMBER

603/2016

12.04.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Superintendent for the respondents present. The departmental representative has not produced the notice as per direction of the last order sheet. Last chance is given to the departmental representative to produce the whole record including notice served upon the appellant on home address of the appellant. The learned counsel for the appellant also submitted copy of departmental appeal. But the learned AAG objected to the veracity of the receipt and signed on the departmental appeal. The department is also directed to produce the dispatch and receipt registers alongwith the concerned officer who received the departmental appeals. Attendance Register of all the appellants be also produced. The department is also directed to produce the record of all those who were mentioned in the advertisement and who were not the appellants before the Tribunal to see that what proceedings were initiated against those others. To come up for record and further proceedings on 14.05.2018 before the D.B.

  
Member

  
Chairman


14.05.2018

The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come up on 31.07.2018.

  
READER

28.09.2017


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

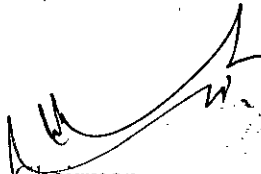
  
Chairman

27.02.2018

Appellant with counsel and Additional AG alongwith Mr. Daud Jan, Superintendent for the respondents present. During the course of arguments it came to the surface that the advertisement in the newspaper was published during vacation. But the stance of the respondents is that the appellant was absent prior to vacation. But there is no mention of the absence period in the advertisement however, in the advertisement there is mention of service of individual notices but those notices are not on the record. Department is directed to produce those notices in order to see that from what date appellants were absent.

The learned Additional AG also disowned of filing of departmental appeal. On the file there is no evidence of dispatch or receipt of the departmental appeal. No date was mentioned on the departmental appeal filed by many appellants jointly. The appellants are directed to prove filing of departmental appeal. To come up for arguments on 12.04.2018 before the D.B.

  
Member

  
Chairman

28.09.2017

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



03.05.2017

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/- 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.

  
(ASHFAQUE 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)  
MEMBER

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.

Appellant Deposited  
Security & Process Fee

  
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.

Form- A

FORM OF ORDER SHEET

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

Case No: 603/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	07/06/2016	<p>The appeal of Mst. Shamia Bibi presented today by Mian Asif Aamam Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	10-6-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>14-6-16</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 603 of 2016

Mst. Shamia Bibi

VERSUS

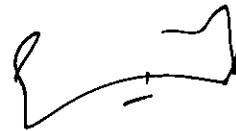
Additional Agency  
Education Officer & others

INDEX

S.No.	Description of documents	Annexure	Pages
1.	Grounds of appeal		1-5
2.	Affidavit		6
3.	Addresses of the parties		7
4.	Copies of the appointment laters.	"A&B"	8-10
5.	Copy of the impugned order dated 18-02-2016 and show cause published notice "	"C & D"	11-12
6.	Copy of Departmental appeal	"E"	13-15
7.	Copies of the attendance registered	"F"	16-25
8.	Copies of the applications and departmental correspondences.	"G to J"	26- 29
9.	Wakalat Nama		

Appellant

Through



MIAN ASIF AMAN

Advocate, High Court,

Peshawar

Off: T-30, 3<sup>rd</sup> Floor Bloor Plaza, Peshawar Cantt.

Cell # 0313-9185077.

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 603 of 2016

MST. ~~SHAMIA~~ BIBI D/O ISAM KHAN, EX-PST TEACHER,  
GOVERNMENT GIRLS MIDDLE SCHOOL, BADDAMA, CENTRAL  
KURRAM, KURRAM AGENCY.

..... APPELLANT  
Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 587

Dated 7-6-2016

VERSUS

- 1) ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL  
KURRAM, SADDA, KURRAM AGENCY.
- 2) DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT,  
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.

PRAYER

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 initially appointed on contract bases as PTC  
Teacher, Government Girls Primary School, Mir Bagh  
vide order dated 15-05-20104, Central Kurram,  
Kurram Agency and regularized her on 22-05-2013,  
Government Girls Middle School Baddama, and since  
then performed her duties with honesty and full

Filed today

Registrar

21/6/16

devotion.(Copies of the appointment later attached as annexure A& B Respectively).

- 2) That the Appellant were 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. (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 inter-alia:

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 were issued to the Appellant.

5) That the Appellant are serving with all Zest and Zeal with the entire satisfaction of her superiors, performed her duties 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. (Copies of the attendance registered attached as annexure "F").

D. That Appellant through 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 bills were received Appellant every month, had the Appellant been absentees would the respondent No 1 had prepared her salary bills. ~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

E. That malafide of the respondent No 1 is overtly established from the factum that against the dishonest conduct of the respondent No 1, the appellant 7 Other Colleague had moved applications prior to issuance of impugned order dated 18-02-2016, wherein serious charges of corruption misconduct were raised before competent authority. (Copies of the applications and departmental correspondence attached as annexure G to J).

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,



9  
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 live 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.
- H. That ulterior motive of the respondents No 1 self 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 the 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 mostly unaware about the removed from service persons postings.
- I. That allegation of the absentee is not corroborated by the official record or any medium of unimpeachable evidence, hence alleged charges baseless and void liable to be struck down.
- J. That the Appellant have been condemned unheard 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.

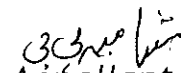
M. That under the law the show cause notice must be issued to every official but herein joint show cause with blanket allegations have been made followed by one pen stroke removal from services impugned order has never been intention of law, needs to be struck down.


N. That any other grounds will be raised at the time of the arguments with prior permission of this Honorable Tribunal.

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

  
Appellant

  
MIAN ASIF AMAN  
Advocate, High Court,  
Peshawar.

Service Appeal No. \_\_\_\_\_ of 2016

Mst. Shamia Bibi

VERSUS

Additional Agency  
Education Officer & others

AFFIDAVIT

I, MST. SAMIA BIBI D/O ISAM KHAN, EX-PST TEACHER, GOVERNMENT GIRLS MIDDLE SCHOOL, BADDAMA, CENTRAL KURRAM, KURRAM 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.

Identified by



MAIN ASIF AMAN

Advocate Peshawar.

ATTESTED  
DEPONENT  
OATH  
COMMISSIONER  
KHALI ADVOCATE  
PESHAWAR

(7)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. \_\_\_\_\_ of 2016

Mst. Shamia Bibi

VERSUS

Additional Agency  
Education Officer & others

Address of the parties

APPELLANT

MST. SHAMIA BIBI D/O ISAM KHAN, EX-PST TEACHER, GOVERNMENT GIRLS  
MIDDLE SCHOOL, BADDAMA, CENTRAL KURRAM, KURRAM AGENCY

RESPONDENTS.

- 1) ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL  
KURRAM, SADDA, KURRAM AGENCY.
- 2) DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT,  
PESHAWAR.
- 3) 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.

OFFICE OF THE AGENCY EDUCATION OFFICER KURRAM AGENCY PARACHINAR

Appointment Order.

Ammeawre

"A"  
8

Consequent upon the approval by the Political Agent Kurram Agency the appointment of the following PTC teachers is hereby ordered purely on contract basis in the interest of public service at Rs.3100/-per month fixed with effect from 15/5/2004 or date of taking over charge.

S.No.	Name of candidate	F/name	School
1	Shaheena Kanwal	Amin Khan	GGPS Tarali ✓
2	Zahida Akbar	Gul Akbar	GGPS Qassei ✓
3	Samina Ahmad	Ahmad Nawaz	GGPS said Mela
4	Rahat Nazir	Mond Nazir	GGPS Dogar No.2 ✓
5	Saba Gul	Murad Ali	GGPS Tarali ✓
6	Asma Jan	Jan Ali	GGPS Tarali Adda ✓
7	Bibi Zartaj	Khalid Khan	GGPS Gandaw
8	Irshad Begum	Mohd Shafiq	GGPS Gandaw
9	Farzana Begum	Afsar Rahim	GGPS Said Karam
10	Naz Begum	Zamin Khan	GCMS Badama ✓
11	Shamia Bibi	Isam Khan	GGPS Mir Bagh ✓
12	Asmat Jehan	Sawad Ali Khan	GGPS said Karam

Terms & Condition

- 1 The appointment is purely made on contract basis.
- 2 The agreement will be renewed on yearly basis.
- 3 These posts are non transferable.
- 4 Their services will be terminated with out any notice.
- 5 They should produce their Health and age Certificate from MS AHQ Hospital Parachinar
- 6 Their age should be between 18-40 years
- 7 Being a project scheme reflected in the ADP, merit has been maintained on test and interview basis and have been selected those candidates who have scored the highest marks according to the decision taken in the meeting on 30/4/2004.

Endst No. 2935-2946/EDU Dated 15/05/2004

Copy to the:-

- 8 Political Agent Kurram Agency
- 9 Director of Education FATA, NWFP, Peshawar
- 10 APA Upper Kurram Agency
- 11 Agency Accounts Officer Kurram Agency
- 12 Teachers concerned
- 13 AAEOs concerned
- 14 Accountant local office

*Ammeawre*  
Agency Education Officer  
Kurram Agency Parachinar

*Ammeawre*  
Agency Education Officer  
Kurram Agency Parachinar

*Ammeawre*

*Ammeawre*

Annexure B<sup>3</sup>

**NOTIFICATION**

Conse... on the approval of the Governor Khyber Pakhtoonkhwa Peshawar endorsed Education FATA Peshawar vide No 7037-44 dated 14.05.2013, the following in the project titled as (Removal of Deficiency of Teaching staff in existing PTC Project team) are hereby regularized against the newly created 200 PTC posts rationalized on schools in K... from 01.04.2013:-

	Father Name	School where Adjusted
	Naseeb Khan	GGPS Gandaw
	Mirza Khan	GGPS Rawooz Sadda
	Ahmad Gul	GGMS Bagan
	Sadri Ayub	GGMS Manduri
	Matiullah	GGPS Mirbagh
	Muhammad Farooq	GGMS Badama
	Noor Mat Khan	GGMS Bagan
8	Roqia Orakzai	GGPS Ossai
9	Abida Wazir	GGPS Shashoo
10	Rosina	GGPS Tarali Ada
11	Farzana	GGPS Alizai
12	Rubab	GGPS Alizai
13	Shamsi Latif	GGPS Pirqayum No 2
14	Shaukat Nazir	GGMS Manduri
15	Bibi Zartaj	GGPS Khar Kali
16	Naz Begum	GGPS Sadda No-1
17	Shabina Awal Khan	GGMS Tarali
18	Saba Gul	GGMS Tarali
19	Shamia	GGMS Badama

Note:-

1. Their regularization is purely made on temporary basis and liable to termination at any time without assigning any notice, in case they want to resign their posts, they will have to give month prior notice or forfeit one month pay in lieu thereof.
2. They are directed to produce their Medical Certificate from the Medical Supdt:A.H.Q Hospital Parachinar.
3. The untrained teachers will acquire the requisite professional training and academic qualification within 02 years after the date of their regularization; otherwise their appointment order will stand cancelled automatically.
4. Charge report should be submitted to this office.

Add: Agency Education Officer Lower & Central Kurram Agency

Endst: No 1083-90/Edu Dated 22 / 05 /2013

Copy forwarded for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Agency Account Officer Kurram Agency.
4. Principals/Headmasters/Headmistresses/Head Teacher concerned.
5. Teachers concerned.
6. Accountant local office.
7. Office

Dilkegal  
Mihayat 24-4-13  
S.E.T. 216  
S.H.S. Shalkh

**ATTESTED**

Add: Agency Education Officer

*(Handwritten signature)*

# CHARGE REPORT

~~Page No.~~

Certified that Miss Shamina D/o Isam Khan have taken over

(10)

charge of this day 01 - 07 - 2013 fore noon of the office  
of the PTC Post at G.G.M.S Badama Central Kurram

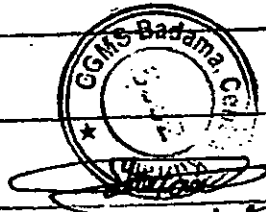
Agency vide Add Education Officer Lower & Central Kurram

No 1083-90 dated 22 - 05 - 2013.

Name Miss Shamina

Signature of Receiving

Grant Servant 14/3/13



2/6/13  
Add Agency Education  
Officer Lower & Central Kurram

*[Signature]*  
Nihaya, G-1-Wara  
S.E.T. B-16  
Q.G.S. Shikho Panch

ATTESTED

*[Signature]*



ADD. AGENCY EDUCATION  
OFFICE SADDA KURRAM AGENCY

PHONE: 0916-520674 FAX: 0916-520671

No: 3374-78 /Edu

Dated Sadda the: 18/02/2016

**REMOVAL FROM SERVICE**

On the fulfilling of all codal formalities the following teachers/Class lvs 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	Sadiga	PET	GGMS Bilyamin
2	Maryam Farooq	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
7	Irfanullah	PST	GPS Hamish Gul Kali
8	Latif Shah	PST	GPS Had Molla
9	Iqbal Hussain	PST	GHS Bilyamin
10	Jasim Khan	Peon	GHS Shah Ibrahim
11	Samad Hussain	Ch	GPS Talo Kunj
12	Muzafar Dawood	Ch:	GGPS Muzafar Kot
13	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 Kurram Sadda

NO: 3374-78 /Edu dated 18/02/2016

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 Kurram Sadda

**ATTESTED**

*Handwritten signature*

*Handwritten notes: Ame... C b*

*Handwritten circled number: 11*





12  
D

ABC CERTIFIED  
ڈیٹا اور اسلام آباد سیکرٹریٹ کے ذریعے پیش کردہ اکثر الاشاعتی قومی اخبار

جلد 49  
22 ربیع الثانی 1437ھ، 02 جولائی 2016ء، 12 روپے  
شمارہ 164

### تعمیراتی خدمات

- (1) IHC 'CT' (2) GGMS 'PET' (3) IHC 'CT' (4) GGMS 'DM' (5) GGMS 'DM' (6) IHC 'CT' (7) GGMS 'DM' (8) GGMS 'AT' (9) GGMS 'TT' (10) GGMS 'TT' (11) GGMS 'TT' (12) GGMS 'TT' (13) GGMS 'PST' (14) IHC 'PST' (15) GGMS 'PST' (16) GGMS 'PST' (17) GGMS 'PST' (18) GGMS 'PST' (19) GGMS 'PST' (20) GGMS 'PST' (21) GGMS 'PST' (22) GGMS 'PST' (23) GGMS 'PST' (24) GGMS 'PST' (25) GGMS 'PST' (26) GGMS 'PST' (27) GGMS 'PST' (28) GGMS 'PST' (29) GGMS 'PST' (30) GGMS 'PST' (31) GGMS 'PST' (32) GGMS 'PST' (33) GGMS 'PST' (34) GGMS 'PST' (35) GGMS 'PST' (36) GGMS 'PST' (37) GGMS 'PST' (38) GGMS 'PST' (39) GGMS 'PST' (40) GGMS 'PST' (41) GGMS 'PST' (42) GGMS 'PST' (43) GGMS 'PST' (44) GGMS 'PST' (45) GGMS 'PST' (46) GGMS 'PST' (47) GGMS 'PST' (48) GGMS 'PST' (49) GGMS 'PST' (50) GGMS 'PST' (51) GGMS 'PST' (52) GGMS 'PST' (53) GGMS 'PST' (54) GGMS 'PST' (55) GGMS 'PST' (56) GGMS 'PST' (57) GGMS 'PST' (58) GGMS 'PST' (59) GGMS 'PST' (60) GGMS 'PST' (61) GGMS 'PST' (62) GGMS 'PST' (63) GGMS 'PST' (64) GGMS 'PST' (65) GGMS 'PST' (66) GGMS 'PST' (67) GGMS 'PST' (68) GGMS 'PST' (69) GGMS 'PST' (70) GGMS 'PST' (71) GGMS 'PST' (72) GGMS 'PST' (73) GGMS 'PST' (74) GGMS 'PST' (75) GGMS 'PST' (76) GGMS 'PST' (77) GGMS 'PST' (78) GGMS 'PST' (79) GGMS 'PST' (80) GGMS 'PST' (81) GGMS 'PST' (82) GGMS 'PST' (83) GGMS 'PST' (84) GGMS 'PST' (85) GGMS 'PST' (86) GGMS 'PST' (87) GGMS 'PST' (88) GGMS 'PST' (89) GGMS 'PST' (90) GGMS 'PST' (91) GGMS 'PST' (92) GGMS 'PST' (93) GGMS 'PST' (94) GGMS 'PST' (95) GGMS 'PST' (96) GGMS 'PST' (97) GGMS 'PST' (98) GGMS 'PST' (99) GGMS 'PST' (100) GGMS 'PST'

ATTESTED  
ہند

Office copy

مکتبہ خدایا دانش گاہ ایجوکیشن فاؤنڈیشن

13

Ameyare

18/10/2016 کو سلازلک

ایجوکیشن فاؤنڈیشن کے ذریعے دوبارہ جاری کیا گیا ہے۔  
"مکتبہ خدایا دانش گاہ"  
دہلی

سائنڈل محمد زین العابدین صاحب

بانی عالی

① یہ سائنڈل 17/11/2016 کو صدر دفتر سے 18/10/2016 کو سلازلک سے اپنے سلازلک  
کا ڈیوٹی لکھنا ثابت احسن طریقے سے سرانجام دیا گیا ہے۔

② یہ سائنڈل 17/11/2016 کو سلازلک سے اپنے سلازلک سے ثابت احسن طریقے سے  
اور لکھنا ثابت احسن طریقے سے سرانجام دیا گیا ہے۔

③ یہ سائنڈل 17/11/2016 کو سلازلک سے اپنے سلازلک سے ثابت احسن طریقے سے  
دیا گیا ہے۔  
(یہ سائنڈل سلازلک سے ہے)

④ یہ سائنڈل 18/10/2016 کو سلازلک سے اپنے سلازلک سے ثابت احسن طریقے سے  
دیا گیا ہے۔  
Remove order is attached.

⑤ یہ سلازلک سائنڈل کو اس کے ساتھ ساتھ  
اپنی ڈیوٹی لکھنا ثابت احسن طریقے سے اور اپنے سلازلک سے ثابت احسن طریقے سے  
دیا گیا ہے۔  
Remove order is attached.

(Remove order is attached)

⑥ یہ سلازلک سائنڈل کو اس کے ساتھ ساتھ  
اپنی ڈیوٹی لکھنا ثابت احسن طریقے سے اور اپنے سلازلک سے ثابت احسن طریقے سے  
دیا گیا ہے۔  
Remove order is attached.

ATTESTED

بانی



(14) یہ مذکورہ ملازمین کو کوئی سوچ نہ دیا گیا اور ان مذکورہ ملازمین کی حق قدر

(15) یہ مذکورہ ملازمین کی فیسوں اور معاشی حالتوں سے کبھی کوئی توجہ نہیں لی اور ان کے اس دور میں گزارے گئے ہیں ان کے سلسلے میں یہ سبھی باتیں گوارا کر کے ملازمین کو ملازمت پر نکلنے کی تیار کیا گیا۔

یہاں پر اس حوالہ سے کہ ملازمین ان کے دور میں ملازمت سے علیحدہ ہو گئے تھے۔ یہ سبھی باتیں ان کے دور میں ہی ہو چکی ہیں۔ ان کے دور میں ان کے حقوق کو ملحوظ رکھنا چاہیے اور ان کے حقوق کو ملحوظ رکھنا چاہیے۔

مذکورہ بالا تمام باتیں (14) اور (15) کے تحت لکھی گئی ہیں۔

- ① copy to Political Agent Kashmir
- ② copy to Account Officer Jammu Agency
- ③ Head Master Command

تاریخ 17 مارچ 1947ء

- ① P.S.T. ② پرمیٹ آف ③ سٹریٹ ٹی ④ پرمیٹ آف
- ⑤ پرمیٹ آف ⑥ پرمیٹ آف ⑦ پرمیٹ آف ⑧ پرمیٹ آف
- ⑨ پرمیٹ آف ⑩ پرمیٹ آف ⑪ پرمیٹ آف ⑫ پرمیٹ آف
- ⑬ پرمیٹ آف ⑭ پرمیٹ آف ⑮ پرمیٹ آف ⑯ پرمیٹ آف

ATTESTED  
 17 مارچ 1947

Amirani Kri Madrasa  
گورنمنٹ گرلز ہائی اسکول، بابت ماہ مارچ سال 2015

تعمیر		شامیہ		لاہوریہ		ہفتہ					
T.T		P.T.C		P.T.C		قومی شاہی کارڈ نمبر					
روزانہ		روزانہ		روزانہ		روزانہ					
							1				
							2				
							3				
							4				
							5				
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	6
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	7
											8
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	9
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	10
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	11
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	12
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	13
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	14
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	15
											16
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	17
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	18
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	19
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	20
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	21
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	22
											23
											24
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	25
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	26
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	27
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	28
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	29
											30
		S.M	1.00	S.M	2.00	R.b	1.00	R.b	2.00	8.00	31
											32
											33
											34
											35
											36
											37
											38
											39
											40
											41
											42
											43
											44
											45
											46
											47
											48
											49
											50

ATTESTED  
[Signature]

رجسٹر حاضر کی مدد سے سید نور عین و گورنمنٹ کالج سکول بہاولپور بابت ماہ اگست سال 2015

نام: \_\_\_\_\_  
 عہدہ: \_\_\_\_\_  
 قومی شناختی کارڈ نمبر: \_\_\_\_\_  
 فون نمبر: \_\_\_\_\_

نام:	رجسٹر	تعداد	تاریخ
عہدہ:	P.T.C	P.T.C	T.T
قومی شناختی کارڈ نمبر:			
فون نمبر:			

تاریخ	آمد	رہا	رواگی	رہا	آمد	رہا	رواگی	رہا	آمد	رہا	رواگی
1											
2											
3											
4											
5											
6											
7											
8	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
9	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
10	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
11	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
12											
13	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
14	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
15	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
16	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
17	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
18	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
19											
20	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
21	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
22	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
23	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
24	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
25	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
26											
27	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
28	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
29	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
30	S.M	11.00	S.M	8.00	R.Z	11.00	R.Z	8.00			
31											

موجودہ	مان	باقی	موجودہ	مان	باقی	موجودہ	مان	باقی	موجودہ	مان	باقی

چیسٹر حاضر کی ملازمین کی فہرست  
 ٹیوٹنٹل سیکولبریاہ اسکول برائے ماہیت ماہ (جی) سال 2015

نام ملازمین		نشانہ		تعداد		ملاحظات		تاریخ		نمبر
P.T.C.		P.T.C.		P.T.C.		P.T.C.		P.T.C.		
روزانگی	روزانگی	روزانگی	روزانگی	روزانگی	روزانگی	روزانگی	روزانگی	روزانگی	روزانگی	نمبر
										1
										2
										3
										4
										5
										6
										7
										8
										9
										10
										11
										12
										13
										14
										15
										16
										17
										18
										19
										20
										21
										22
										23
										24
										25
										26
										27
										28
										29
										30
										31
Sun		Sunday								

Checked  
 [Signature]  
 [Signature]  
 [Signature]

گورنمنٹ پبلسک اسکول، مہراں، لاہور۔ ایک ماہہ ۱۹۷۱ سال ۱۹۷۱  
 لاہور حاضری اور لائبریری

شاخہ		کلاس		نمبر		تاریخ		وقت		نمبر
مذکورہ	مذکورہ	مذکورہ	مذکورہ	مذکورہ	مذکورہ	مذکورہ	مذکورہ	مذکورہ	مذکورہ	مذکورہ
SM	1100	SM	8100	//	1.05	//	8.00			1
SM	1100	SM	8100	//	1.05	//	8.00			2
										3
SM	1100	SM	8100	//	1.05	//	8.00			4
SM	1100	SM	8100	//	1.05	//	8.00			5
SM	1100	SM	8100	//	1.05	//	8.00			6
										7
SM	1100	SM	8100	//	1.05	//	8.00			8
SM	1100	SM	8100	//	1.05	//	8.00			9
SM	1100	SM	8100	//	1.05	//	8.00			10
SM	1100	SM	8100	//	1.05	//	8.00			11
SM	1100	SM	8100	//	1.05	//	8.00			12
SM	1100	SM	8100	//	1.05	//	8.00			13
										14
SM	1100	SM	8100	//	1.05	//	8.00			15
SM	1100	SM	8100	//	1.05	//	8.00			16
SM	1100	SM	8100	//	1.05	//	8.00			17
SM	1100	SM	8100	//	1.05	//	8.00			18
SM	1100	SM	8100	//	1.05	//	8.00			19
SM	1100	SM	8100	//	1.05	//	8.00			20
										21
SM	1100	SM	8100	//	1.05	//	8.00			22
SM	1100	SM	8100	//	1.05	//	8.00			23
SM	1100	SM	8100	//	1.05	//	8.00			24
SM	1100	SM	8100	//	1.05	//	8.00			25
SM	11.00	SM	8.00	//	1.05	//	8.00			26
S.M.	(11.00)	S.M.		//	11.00	//	8.00			27
										28
S.M.	1.05	S.M.	8.00	//	1.05	//	8.00			29
										30
										31

ATTESTED  
 [Signature]



20

رہنما حاضر کی مدد سے

بابت ماہ سال

تاریخ:

عہدہ:

قومی شناختی کارڈ نمبر:

فون نمبر:

تاریخ	آؤ	رہنما	رہنما	آؤ	رہنما	رہنما	آؤ	رہنما	رہنما	آؤ	رہنما
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											
16											
17											
18											
19											
20											
21											
22											
23											
24											
25											
26											
27											
28											
29											
30											
31											
تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ
تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ
تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ
تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ
تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ	تعمیر	حالیہ

Summer Vacation  
July 2015

[Signature]

رہنما مدرسہ

(Your suggestions will be welcome)

گورنمنٹ ٹریننگ کالج سکول برائے بابت ماہ اگست سال 2015

(جی) جیٹر حاضر میڈیکل سائنس

شاخہ		تقسیم		کلی رکن		کلی رکن		کلی رکن		ردیف
P-T-L		Reguler		T-T		Reguler		P-T-L		
										1
										2
										3
										4
										5
										6
										7
										8
										9
										10
										11
										12
										13
										14
										15
										16
										17
										18
										19
										20
										21
										22
										23
										24
										25
										26
										27
										28
										29
										30
										31

**ATTESTED**

(Your suggestions will be welcome)

(Your suggestions will be welcome)

رقم سند	رقم سند	رقم سند
P.T.C	P.T.C	P.T.C
مشتا	رأب	زائد

روز	مشتا	مشتا	مشتا	رأب	رأب	رأب	زائد	زائد	زائد	روز	
1	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				1	
2	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				2	
3	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				3	
4	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				4	
5	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				5	
6	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				6	
7	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				7	
8	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				8	
9	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				9	
10	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				10	
11	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				11	
12	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				12	
13	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				13	
14	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				14	
15	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				15	
16	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				16	
17	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				17	
18	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				18	
19	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				19	
20	S.M 1.00	S.M 1.00	Sunday								20
21	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				21	
22	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				22	
23										23	
24										24	
25										25	
26										26	
27	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				27	
28	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				28	
29	S.M 1.00	S.M 1.00	R.b 1.00	R.b 9.00	Z.K 1.00	Z.K 8.00				29	
30					Z.K 1.00	Z.K 8.00				30	
31										31	

Handwritten signatures and notes at the bottom of the page, including a large signature and the word 'seth'.

23

رجسٹر حاضری مدرسہ سیدین گورنمنٹ ہائی اسکول سندھ آباد بابت ماہ سال

نام:		زاد:		رابطہ:		تاریخ:		تاریخ:		تاریخ:		
P.T.C		P.T.C		P.T.C		P.T.C		P.T.C		P.T.C		
قومی شناختی کارڈ نمبر:		قومی شناختی کارڈ نمبر:		قومی شناختی کارڈ نمبر:		قومی شناختی کارڈ نمبر:		قومی شناختی کارڈ نمبر:		قومی شناختی کارڈ نمبر:		
فون نمبر:		فون نمبر:		فون نمبر:		فون نمبر:		فون نمبر:		فون نمبر:		
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	1
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	2
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	3
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	4
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	5
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	6
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	7
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	8
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	9
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	10
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	11
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	12
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	13
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	14
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	15
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	16
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	17
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	18
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	19
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	20
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	21
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	22
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	23
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	24
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	25
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	26
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	27
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	28
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	29
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	30
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	31
S.h	1.00	S.h	2.00	R.b	1.00	R.b	8.00	Z.K	1.00	Z.K	8.00	32

Handwritten signature and scribbles in the bottom left corner.

Handwritten signature and scribbles in the bottom center.

رجسٹرڈ نرسی ملحدین

نورہ خدیجہ گریڈ اول سکول بابت ماہ نومبر سال ۱۹۵۶ء

نام:	زبان:	رابطہ:	شمارہ:
	P.T.C	P.T.C	P.T.C
قومی شناختی کارڈ نمبر:			
فون نمبر:			

روز	وقت	نوع	مکان	نوع	مکان	نوع	مکان	نوع	مکان	نوع	مکان
1											
2	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
3	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
4	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
5	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
6	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
7	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
8											
9	S.M	1:00	8:00	8:00							
10	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
11	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
12	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
13	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
14	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
15											
16	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
17	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
18	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
19	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
20	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
21	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
22											
23	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
24	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
25	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
26	S.M	1:00	8:00	8:00	R.b	1:00	R.b	8:00	Z.K	1:00	Z.K
27	S.M	1:00	8:00	8:00					Z.K	1:00	Z.K
28	S.M	1:00	8:00	8:00					Z.K	1:00	Z.K
29											
30	S.M	1:00	8:00	8:00					Z.K	1:00	Z.K
31	S.M	1:00	8:00	8:00							

ATTESTED

(Your suggestions will be welcome)





10  
19

FATA SECRETARIAT  
DIRECTORATE OF EDUCATION  
Warsak Road Peshawar  
No. \_\_\_\_\_ dt: 03/08/10  
A-12/Majid Gul I/C H/M

To

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Subject: COMPLAINT/ENQUIRY  
Memo

Annexure  
① ② ③ ④  
⑤ ⑥ ⑦ ⑧ ⑨ ⑩  
⑪ ⑫ ⑬ ⑭ ⑮ ⑯ ⑰ ⑱ ⑲ ⑳  
㉑ ㉒ ㉓ ㉔ ㉕ ㉖ ㉗ ㉘ ㉙ ㉚ ㉛ ㉜ ㉝ ㉞ ㉟ ㊱ ㊲ ㊳ ㊴ ㊵ ㊶ ㊷ ㊸ ㊹ ㊺  
26

I am directed to enclose herewith a copy of the complaint received in this office 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.

SY  
DY: DIRECTOR EDUCATION  
FATA SECRETARIAT PESHAWAR

Endst: No. 11224-29

- Copy forwarded to:-
- 1 Addl: AEO, Lower/Central Kurram
  - 2 ✓ Principal GMHS Sadda, Kurram Agency
  - 3 P.A to D.E FATA

DY: DIRECTOR EDUCATION  
FATA SECRETARIAT PESHAWAR

**ATTESTED**

جناب والا شان ایڈیشنل چیف سیکرٹری فانا

درخواست برائے کارروائی طلباء کی حالت پر رحم کرنا

اور مجید گل SET کے خلاف کارروائی کرنا

42  
Amexuz  
H  
27

جناب والا شان شائد آپ کے علم میں ہوگا کہ مجید گل صدر دفتر میں AAEO پوسٹ پر تھا اور انچارج ایڈیشنل AAEO بھی تھا 18 مارچ 2015ء کا تبادلہ گورنمنٹ حوائی سکول لیکن حسیت SET کیا گیا ہے۔ نمبر 25/04/2015 تک اس نے سکول کا شکل تک نہیں دیکھا ہے۔ جو ہمارے بچوں کسا تحت ناسانی اور ظلم ہے۔ مجید گل پہلے سے مادی ہے۔ بطور ثبوت اس کا سابقہ ریکارڈ پیش کرنا چاہتا ہوں۔

(۱) 2009ء میں ایجوکیشن آفس صدر سے مجید گل کا ٹرانسفر GMHS صدر حسیت SET کیا گیا تو وہ ڈیوٹی سے غائب رہتا تھا آخر کار پرنسپل صدر کے NO: 60 dated 06/03/2015 اسکے غیر حاضری کے خلاف ڈائریکٹر ایجوکیشن فانا کو خط لکھا گیا (دیکھتے ہیں) صفحہ 3

(۲) اسکے بعد وہ ایس صدر دفتر میں آنے کا کوشش کر رہا تھا۔ اور منام ڈائری کرنے کا سہارا لیا ایڈیشنل ایجوکیشن آفس نے ایک بار پھر اسکے خلاف ڈائری ایجوکیشن فانا کو ایک خط نمبر: NO: 709-11 dated 03/05/2010 کے ذریعے آگاہ کیا۔ (دیکھتے ہیں) صفحہ 3

(۳) ڈائریکٹر ایجوکیشن فانا نے اسکے خلاف ڈائری ایڈیشنل ایجوکیشن خیر چشتون خواہ کو ایک خط نمبر: NO: 11665-66 dated 03/08/2010 کے ذریعے کارروائی لینے لکھا (دیکھتے ہیں) صفحہ 3

جناب والا شان

مجید گل کو ایک بار پھر سیاسی پشت پناہی حاصل ہوئی کارروائی تو دور کی بات۔ اس کو ایک بار پھر ایڈیشنل AEO مقرر کیا۔ اور وہ (2) سالوں میں اس نے اوور سنٹرل ٹرم کے تعلیمی ڈھانچے کو کروڑوں کے عوض اتاہ کیا۔ اساتذہ کو گھروں بیٹھا کر نفسی نفسی تنخواہ پر مجبور کرتا تھا۔ وہ در بھی ڈرا جب ایک دفعہ پھر اس کو حوائی سکول لیکن تبدیل کیا گیا تو تباہی کی ہاری حوائی سکول لیکن کو نصیب میں ملی، اور یہی سب کچھ پورا کیا جاتے گا۔

جناب والا شان ہماری بچوں پر رحم فرما کر اس انسان کو KPK میں کسی پرنسپل کو والہ کر کے ڈیوٹی کا مادی بنایا جائے

گزارش ہے

تاریخ 25/04/2015

العارضین

اہلیان لیکن ٹرم ایجنسی

خط کی نقل بھیجی گئی

- (۱) ڈائریکٹر ایجوکیشن فانا
- (۲) سیکرٹری سوشل سیکرٹری
- (۳) پولیٹیکل ایجنٹ ٹرم
- (۴) اسٹیٹ پولیٹیکل ایجنٹ لوئر ٹرم

ATTESTED

لعل



بخدمت جناب ایڈیشنل چیف سیکرٹری فنانس سیکرٹریٹ

اپیل برائے فراہمی انصاف اور کیونٹی سکولوں کے  
خواتین، حضرات ٹیچرز کو مئی 2013ء سے ریگولر کرنا۔

Anmeav (e)

28

جناب والا: جیسا کہ آپ کو معلوم ہے کہ 15 سال قبل فنانس سیکرٹریٹ کی کیونٹی سکولوں کا قیام عمل میں آیا تھا۔ اس دوران کئی بار سکولوں کو دوران کے اساتذہ کو ختم کر کے پھر بحال کر کے آگے بھولی جاری تھی حتیٰ کہ اس پر احتجاج کا سلسلہ اسلام آباد تک جا پہنچا آخر کار گورنر خیر پختون خوانے اس میں فنانس سیکرٹریٹ کے ذریعے ایک فرمان جاری کیا (No: So(E)/SSD/CSTR/99-108/) کہ تب تک تازہ بھرتی پر پابندی ہوگی جب تک کیونٹی سکولوں کے تمام اساتذہ ریگولر نہ ہو اور اس میں یہ شرط بھی تھی کہ سب سے پہلے لوکل پھر نان لوکل کو ریگولر کیا جائے (فنانس سیکرٹریٹ خط تھی ہے)

جناب والا: سابقہ ایڈیشنل AEO حاجی معین گل صاحب نے ایمانداری کر کے تقریباً تمام لوکل اساتذہ کو ریگولر کر دیا۔ جبکہ نان لوکل کیلئے کوئی خالی پوسٹ نہ رہا۔ مگر تسلی دی کہ خالی پوسٹ آنے والے ہیں اس دوران حاجی معین گل صاحب کا تدارک کر دیا گیا اور اسکی جگہ مجید گل ایڈیشنل AEO مقرر ہوا۔ مختصر ایک ماہ بعد بہت زیادہ PTC پوسٹ ایجوکیشن آفس صدرہ کوئل گئے۔ جس پر پہلے پرائیکٹ ٹیچرز کو ریگولر کر دیا جبکہ تقریباً 35 پوسٹ بقایا رہ گئے۔ اور کئی PTC اساتذہ کا 2012ء انٹرویو میں CT پوسٹ پر تعیناتی ہوئی ان کے سیٹ بھی خالی ہو گئے دو (2) ماہ بعد میں صدرہ ہوا کہ خالی پوسٹوں پر غیر قانونی اور خفیہ طریقے سے تعیناتی شروع ہے۔ جس کیلئے ہم نے بطور صدرہ ایڈیشنل چیف سیکرٹری کو ایک خط بھی لکھا (نیکسٹ کاپی درخواست ہذا اسکا تھ لف ہے) مگر کسی نے کوئی کان نہیں ڈہرایا۔

اب خدشات درست ثابت ہوئے مجید گل صاحب (فرخون۔ ظالم) نے اقرباء پروری اور ظلم کی انتہا کر کے ہماری حق پر ڈاک ڈال کر لوگوں سے کروڑوں میں رشوت لیکر ہمارا حق چھین لیا۔ اور خود کروڑوں کا مالک بن کر اپنے گاؤں پن میں شامان طرز مقان تعمیر کیا اپنے بیٹے کیلئے مبلغ میں (20) لاکھ روپے یا سمود کاویہ خرید کر بیرون ملک بھیج دیا۔ ہم ابھی تک در بدر لکھ رہے ہیں آخر کار ہم نے فیصلہ کیا کہ ایک دفعہ پھر ہم آپ صاحب کے سامنے یہ فریاد رکھنا چاہتے ہیں

(1) کہ ہمیں مئی 2013ء سے ریگولر کر دیا جائے

(2) جن لوگوں کو غیر قانونی حق دیا ہے ان کو زمینیت کر کے ہمارے لئے پوسٹیں خالی کئے جائے

(3) ظالم کو پھر تازہ سزا دیا جائے تاکہ مستقبل میں کوئی اور ایسا اثرات نہ کر سکے۔ بصورت مجبوری عدالت کے دروازے ہر مظلوم کیلئے کھلے ہیں

العارضین نان لوکل کیونٹی سکول ٹیچرز

- (1) سومیرہ غنیمت NIC: 17101-344927-6 (2) حویرا شمس NIC: 17101-8561110-8 (3) گوہر سیما NIC: 14203-4789022-4  
(4) لہنی عزیزہ NIC: 16201-6629858-4 (5) نازیہ خاتون NIC: 14203-8724258-2 (6) حلیمہ (7) سیما (8)  
کوثر فریدہ NIC: 17101-1397459-6 (9) نور جہان NIC: 142032798389-2 (10) غوثیہ افضل (11) واحد بی بی NIC: 16202-4256650-0  
(12) راحت جان NIC: 17101-0292256-4 (13) رفعت نازہ NIC: 142031984611-2 (14) روبینہ NIC: 17101-0313917-6  
(15) یاسمینہ (16) سیما گل NIC: 17201-5095077-4 (17) زینب بی بی (18) راحت نذیرہ NIC: 17101-4189294-6  
(19) فضیلت NIC: 16102-2219600-0 (20) سویرا NIC: 17101-8617813-2

اس درخواست کی کاپی مندرجہ ذیل کو بھیج دی گئی۔

(1) پولیٹیکل ایجنٹ گرم  
(2) ڈائریکٹر ایجوکیشن فنانس سیکرٹریٹ پشاور

ATTESTED

ب

**ALL G.T., P.E.T., DM. TEACHERS ASSOCIATION**

Annexure  
J.6  
29

Lower Kurram & Central Kurram Agency. Ph:520744  
Head Office: Sadda Kurram Agency.

1. President:  
Mr. Mohammad Ishaq Khan  
M.A., B.Ed, C.T.
2. Vice President:  
Mr. Mohammad Rafiq Orakzai  
M.A., B.Ed, C.T.
3. General Secretary:  
Mr. Khan Gul  
M.A., M.Ed, C.T.
4. Joint Secretary:  
Mr. Tariq Mahmood  
M.A., P.E.T
5. Finance Secretary:  
Mr. Qasim-ud-Din  
M.Sc, B.Ed
6. Press Secretary:  
Mr. Abdul Qadir  
M.A., B.Ed, C.T

صیاب ریجنل ڈائریکٹریٹ NAB پشاور  
درخواست بہرے ریکری بلغ 25403000  
ڈونر ٹو ہیڈ آفس لاکھ پانچ سو نو  
2 اور لاکھ چالیس سو چالیس  
لاکھ پانچ سو نو  
لائیٹ اینڈ ٹیلی گرام

**EXECUTIVE COMMITTEE:**

1. Mr. Nisar Mohammad  
C.T. G.H.S., Bagam
2. Mr. Mohammad Hakim  
C.T. G.H.S., Uchat
3. Mr. Abdul Jalil Khan  
C.T. G.H.S., Manatoo
4. Mr. Mohammad Itaf  
C.T. G.M.H.S., Sadda
5. Mr. Mohammad Tahir  
D.M. G.M.S., Arawali
6. Mr. Mohammad Zubair  
C.T. G.H.S Badama
7. Mr. Adil Bad Shah  
P.E.T. G.M.S Tarali
8. Mr. Hazrat Khan  
C.T. G.H.S., Angori Ck
9. Mr. Fazal Hamid  
D.M. G.M.S. Baza Ck
10. Mr. Amir Rehman  
D.M. G.M.S., Tarali
11. Mr. Ahmad Khan  
C.T. G.H.S., Angori

صیاب! سو ادیانہ لکھڑاں ہے کہ صیاب ریجنل ڈائریکٹریٹ لاکھ پانچ سو نو  
فردوسی چھ سو پانچ سو چھ سو چھ سو چھ سو چھ سو چھ سو چھ سو چھ سو  
لوٹ مار کا بازار لکھڑاں لکھڑاں لکھڑاں لکھڑاں لکھڑاں لکھڑاں لکھڑاں لکھڑاں  
الغیر اشہار 29 ہزار 2000 روپے فی کس 6000000 = 20 x 300000  
2 ہزار 2000 روپے فی کس 228000 = 19 x 12000  
3 ہزار 2000 روپے فی کس 275000 = 55 x 5000  
4 فی ماہ ہر ممبر اور کھولے ہوئے فون سے اوسط ٹوٹی فی کس 500000 = 1000 x 500  
5 کمپوٹی ٹوٹی کھولے ہوئے فون سے اوسط ٹوٹی فی کس 550000 = 50000 x 11  
6 ہر ماہ 20 ہزار 2000 روپے فی کس 300000 = 30 x 10000  
7 لوٹ مار اور ٹیلی گرام اور لاکھ پانچ سو چھ سو چھ سو چھ سو چھ سو چھ سو چھ سو چھ سو  
550000 = 5500 x 10000  
5500 گیلن فی ماہ  
12100000  
25403000

صیاب فاؤنڈیشن اس کے علاوہ مذکورہ آفسر نے رینڈ گاؤں گیلن میں ایک علی شانہ  
مکان 191 حجرہ تعمیر کیا ہے اس کے علاوہ 55 گیلن فی ماہ  
P.T.O

ATTESTED  
تہ

صناب دلا اسکے بارے میں کئی بار ڈائریکٹر کو بھی آگاہ کیا  
سٹیٹ ٹریڈی انٹنیشنل ڈرائیو صاحب کو بھی آگاہ کیا مگر ابھی تک  
افسر منرے اڑا رہے ہیں اور اس میں اس کے ساتھ اور لوگ  
بھی ملوث ہیں

لنڈا درخواست کی جاتی ہے کہ مندرجہ افسر مجید گل کو گرفتار  
کر کے اس کے خلاف کارروائی عمل میں لائی جائے اور حکام  
مختص سے جتنا مال کھایا ہے۔ واپسی کی درخواست ہے  
آپ اصلے افسر کریں گے

عین لائن میں ہوگی

5-1-2014

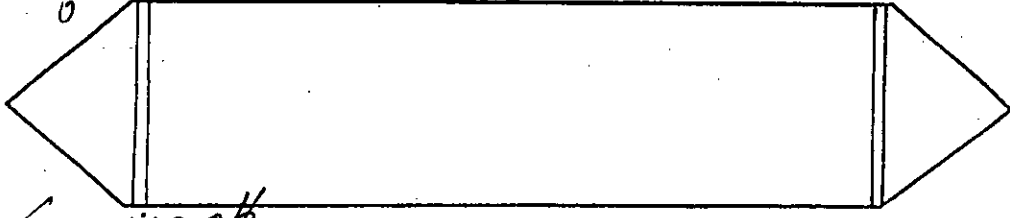
تقریر درخواست بھیجی گئی  
ڈائریکٹر جنرل نیٹب NAB / سلام آباد

از صدر بارہا کسٹ

ATTESTED

لنڈا

بعد الت خدا - *بسم الله الرحمن الرحيم* - *الحمد لله رب العالمين*



مورخہ --- 6 جون 2014ء منجانب  
 مقدمہ --- *مہتمم ایس ایس پی صاحبہ* کی درخواست پر بنام *ایس ایس پی صاحبہ* کی درخواست پر  
 دعویٰ --- *مذکورہ بالا درخواست پر*  
 جرم --- *مذکورہ بالا درخواست پر*

**سروس ریسیل**  
**باعث تحریر آئینہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
 آن مقام *ریسیل* کیلئے *مذکورہ بالا درخواست پر*  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار دگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور وصولی چیک در و پیسہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو ہمیشی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 6 ماہ جون 2014ء

بمقام *ریسیل* کے لئے منظور ہے۔  
*ریسیل*  
 واہ الع

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal No: 603/2016

Mst: Shamia Bibi D/O Islam Khan Ex-PST GGMS Buddama Kurram

Agency.....Appellant.

**VERSUS**

1. Additional Agency Education Officer Lower & central Kurram Agency.
2. Director Education FATA.
3. Agency Education Officer Kurram Agency.
4. Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar.....Respondents.

**Para-wise comments on behalf of respondent No: 1 & 2.**

**Respectively Sheweth:**

**Preliminary Objection**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.

**On Facts:**

1. No comments. Pertains to record.
2. Incorrect. The appellant was not performing her duty efficiently and regularly. Therefore the Competent Authority takes action against the appellant in the interest of Public as well as in the interest of the Department. Appellant was willfully absented herself. Notices were issued to the appellant but she failed to attend the office of the Competent Authority. Show cause notice published in the News paper on 02/02/2016. Therefore after fulfillment of all codal formalities the appellant was removed.
3. Incorrect. The departmental appeal of the appellant is not available in the record of the respondents.
4. Incorrect. As explained in Para-2 above however reply of the grounds is as under.


**Grounds:**

- A. Incorrect. The impugned has been passed by the Competent Authority after fulfillment of all codal formalities.
- B. Incorrect. As explained in Para-A above.
- C. Incorrect. Show Cause notice has been given by the Competent Authority in the Daily Mashriq on 02/02/2016 the appellant was directed to resume her duty but she failed to do so.
5. As explained in Para-C above.
- D. Incorrect. Respondent No.1 Additional Agency Education Officer has not prepared the pay bills of the appellant for absent period
- E. Incorrect. The department correspondence not relates to appellant absentee but on another issue. The same has been inquired by the Competent Authority and found baseless.
- F. Incorrect. The appellant was directed to attend the office of the Agency Education Officer to explain her position as she has been found absent prior to vacation period.

- G. Incorrect. The Competent Authority published a show cause notice in the Daily Newspaper to explain reason of absentee without newspaper there is no other source with the respondents to inform the teacher in time.
- H. Incorrect. Those candidates/person who attended the office of the Agency Education Officer and explained their position and presented cogent reason about their absentee were left and those candidates including appellant did not obey the order of the Competent Authority were removed in accordance with law and in the interest of public.
- I. As explained in Para-H above.
- J. As explained in Para-C above.
- K. As explained in Para-G above.
- L. Incorrect. After fulfillment of all codal formalities the Competent Authority takes action and removed order of the appellant has been issued in the interest of Public as well as in the interest of the department.
- M. Incorrect. According to law & rules show cause notice has been publishing the Daily Mashriq on 02/02/2016 and directed the appellant to explain her willful absence from Government duty.
- N. Respondents are also seeks permission to advance other grounds & proofs at the time of arguments.

In light of the above factual position it is humbly prayed that the appeal in hand may kindly be dismissed.

Respondent NO. 1

  
Addl: Agency Education Officer  
Kurram Agency


Respondent NO. 2

  
Director Education FATA 2/5/17

### AFFIDAVIT

We the above respondents do hereby declare and affirm on oath that the above comments are true and correct to the best of our Knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Respondent NO. 1

  
Addl: Agency Education Officer  
Kurram Agency

Respondent NO. 2

  
Director Education FATA 2/5/17