#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL. CAMP COURT ABBOTTABAD

Service Appeal No. 615/2016

Date of Institution... 08.06.2016

Date of decision... 19.04.2018

Mst. Haseen Shaheen PST GGPS Ghulamabad Tehsil and Distrcit Haripur c/o Rajput Nelaam Ghar near Silkway Plaza, G.T Road, Tehsil & District Haripur.

... (Appellant)

#### Versus

1. The District Education Offficer (Female) haripur and 1 other.

(Respondents)

Malik Imran Ali,

Advocate ... For appellant.

Mr. Usman Ghani,

District Attorney ... For respondents.

MR. NIAZ MUHAMMAD KHAN,

CHAIRMAN

MR. MUHAMMAD HAMID MÜGHAL, ... MEMBER

#### <u>JUDGMENT</u>

NIAZ MUHAMMAD KHAN. CHAIRMAN: Arguments of the learned counsel for the parties heard and record perused.

#### **FACTS**

2. The appellant was compulsorily retired on 19.01.2016 against which she filed departmental on 16.02.2016 which was not responded and thereafter, she filed the present service appeal on 08.06.2016.

#### **ARGUMENTS**

3. The learned counsel for the appellant argued that the appellant was transferred from Kahaka to Awan Mohra on 08.11.2012 and then temporarily adjusted at Choar

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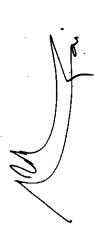
Sharif on 07.11.2013. That on 23.09.2014 the temporary order was withdrawn and the appellant reported back at Awan Mora. That she reported at Awan Mohra on 25.09.2014 and performed her duty till 05.09.2015. That on the verbal direction of one Shaista ADEO on 06.02.2015 she joined her duty at Ghulam Abad where she reported for duty and had been performing her duty. Then suddenly her pay was stopped in August 2015 for which she moved some applications to the concerned authority and then filed a Writ Petition before the Worthy Peshawar High Court Peshawar but during the pendency of the Writ Petition the impugned order was passed and the Peshawar treated that Writ Petition as departmental appeal and sent it to departmental appellate authority for decision in accordance with law and rules. That the appellant never remained absent. That the whole proceedings were the result of personal grudges with the appellant on the basis of some complaint moved by the appellant against one responsible officer of the department. That she was not given any charge sheet or statement of allegation. That she was not informed about any inquiry proceedings. That she was not afforded personal hearing. That the whole proceedings were illegal.

4. On the other hand, the learned District Attorney argued that the appellant remained absent from Awan Mohra and when her temporary order was cancelled from Choar Sharif, she did not report back to Awan Mohra. That her duty at Ghulam Abad was also illegal. That proper charge sheet was served alongwith statement of allegations. That proper inquiry was conducted. That she was served with final show cause notice which she duly replied and then penalty was imposed on her in accordance with rules. That the charge of misconduct and absence as leveled in the charge sheet were duly proved and she was rightly compulsorily retired from service. He further argued that it was proved on record that the appellant was duly served for

her appearance before inquiry committee and the notice in this regard was also annexed with the inquiry report. That the appellant also did not appear for personal hearing despite repeated services and reminders.

#### CONCLUSION.

Without touching the merits of the appeal, if we go through the report of the inquiry committee, no findings have been given and only recommended proceedings under Khyber Pakhtunkhwa Government Servants (E&D) Rules 2011. Before this recommendation the inquiry committee has not touched the merits of the case and opined that since the appellant despite service did not appear before the inquiry committee, therefore, it seemed that she was guilty. In the final show cause notice, the authority herself has written that the inquiry committee recommended the disciplinary proceedings against the appellant. This clearly suggests that the enquiry committee did not hold the appellant as guilty rather recommended proper proceedings under the relevant rules. It is beyond understanding that what did enquiry committee meant from this. The rules on the subject are that whenever after service the delinquent officer fails to appear before the inquiry officer/committee, the inquiry officer/committee is to proceed ex-parte and after receiving ex-parte evidence is to decide the matter under Sub Rule-2 of Rule-11 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. It appeared that the inquiry committee circulated some questionnaires to the officer of the department then it was incumbent upon the inquiry officer to have ordered ex-parte proceedings and then should have decided the matter on the basis of questionnaire and other materials available on record. The inquiry committee committed mistake by not following this procedure and then suggested to the authority for initiation of disciplinary proceedings. Disciplinary proceedings were already initiated by the authority. If this mistake was committed by the inquiry committee then



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the authority should have remanded the inquiry back to the committee for ex-parte

proceedings and deciding the same in accordance with law. By not doing so the spirit

of the disciplinary rules have not been followed. Secondly no copy of the inquiry

report was annexed with the final show cause notice and the appellant was prejudiced

in her defence by not supplying the copy of the inquiry report to her. Even otherwise

as observed above there was nothing in the inquiry report against the appellant except

that she was served and did not appear before the enquiry committee.

6. As a sequel of the above discussion this Tribunal is of the view that the whole

proceedings were illegal. The impugned order is set aside and the appellant is

reinstated in service. The department is however at liberty to hold denovo proceedings

in accordance with law within a period of 90 days from the receipt of this judgment.

The issue of her back benefits shall be subject to the final outcome of the denovo

proceedings, if any, and rule on the subject. Parties are left to bear their own costs.

File be consigned to the record room.

Niaz Muhammad Khan) Chairman

Camp Court, A/Abad

(Muhammad Hamid Mughal) Member

<u>ANNOUNCED</u> 19.04.2018 20.03.2018

Appellant alongwith counsel and Mr. Usman Ghani, District Attorney alongwith Mst. Nagina Bibi, ADO for the respondents present. Counsel for the appellant seeks adjournment.. To come up for arguments on 19.04.2018 before D.B at camp court, Abbottabad.

Member

Camp court, A/Abad

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19.04.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mst. Nagina Bibi, ADO and Saima Raza, ADO for the respondents present. Arguments heard and record perused.

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

Member

ANNOUNCED 19.04.2018 25.05.2017

Since tour programme to camp court, Abbottabad for the month of May, 2017 has been cancelled by the Worthy Chairman, therefore, to come up for the same on 22.11.2017 at camp court, Abbottabad. Notices be issued to the parties for the date fixed accordingly

22.11.2017

Appellant with counsel and Mr. Kabeerullah Khattak, Addl. AG alongwith Mst. Saima Raza, ADO for the respondents present. Rejoinder submitted. Counsel for the appellant seeks adjournment. To come up for arguments on 18.01.2018 before the D.B at camp, Abbottabad.

Member

Camp Court, A/Abad.

18.01.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mst. Saima Raza, ADO for the respondents present. Counsel for the appellant submitted certain documents which is placed on file. He requested for adjournment. Adjourned. To come up for arguments on 20.3.2018 before the D.B at camp court, Abbottabad.

25.11.2016

Clerk of counsel for the appellant and Mst. Saima ADEO alongwith Mst. Bushra Bibi, Government Pleader for official respondents No. 1 & 2 present. Requested for adjournment. To come up for written reply/comments on 16.02.2017 at camp court, Abbottabad.

Chairman Camp Court, A/Abad

16.02.2017

Appellant with counsel present and fresh Wakalatnama submitted. Jehangir Khan, Assistant alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 17.05.2017 at camp court, Abbottabad.

MEMBER
Camp Court, A/Abad

.22.06.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PST when subjected to enquiry on the allegations of absence and other charges compulsorily retired from service vide impugned order dated 19.01.2016 where-against she preferred departmental appeal on 16.02.2016 which was not responded and hence the instant service appeal on 08.06.2016.

Securing Process Fee

That the allegations attributed to the appellant are false. That no enquiry in the manners prescribed by law was conducted and appellant not associated with the same and as such the impugned order is against facts and law.

Points urged need consideration. Admit. Subject to deposit of security and process fee notices be issued to the respondents. To come up for written reply/comments on 22.09.2016 before S.B at camp court, Abbottabad.

Charman Camp court, A/Abad,

22.09.2016

None for the appellant present. Mr.Umar Iqbal, ADO alongwith Mr. Muhammad Siddique Sr.GP for the official respondents No. 1 & 2 present. Requested for adjournment. None present for private respondent No. 3 despite service. Proceeded ex-parte. To come up for written reply/comments of official respondents No. 1&2 on 25.11.2016 before S.B at camp court, Abbottabad.

Chairman Camp court, A/Abad

# Form- A FORM OF ORDER SHEET

Court of			
	•		
Case No	<u>615/2</u>	<u>016</u>	

Case No. <u>615/2016</u>			
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate	
1	2	3	
1	08/06/2016	The appeal of Mst. Haseena Shaheen presented today by Mr. Noumanullah Malik Advocate may be entered in the Institution Register and put up to the Worthy Chairman for	
		proper order please.  REGISTRAR 8 6 16	
2-	10-6-16	This case is entrusted to Touring S. Bench at A.Abad for	
		preliminary hearing to be put up there on. $22-6-201$	
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# BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Appeal No. 615/2016

Haseena Shaheen

Vs The DEO(F) and another

# SERVICE APPEAL

# INDEX

Sr#	Description of documents	Annexure	Pages
1	Memorandum of appeal along with affidavit		1-13
2	The copies of transfer order No. 2088-93 dated 08/11/2012 and order No. 879-84 dated 07/11/2013	A & A1	14-15
3	Attendance report of charge, relieving chit of GGPS Chohar Sharif and Log book of GGPS Chohar sharif.	B, B-1 & B-2	16-18
4	Copy of application of Head teacher GGPS Ghulamabad.	С	19
5	Copy of charge report.	D	20
6	Copy of complaint along with letter.	E	21-25
7	Gowshawara of GGPS Awan Mohra for the month of May, 2014.	F	26
8	Copy of application for release of salary of appellant.	G	27-28
9	Copy of form containing release of salary of appellant.	Н	29
10	Copy of the show notice Endst No. 6092-93 /DEO (F) Haripur / Estb; Pry / Discpl. Action, dated 16/06/2015.	1	30
11	Copy of applications for leave and medical reports and other attached documents.	J	31-44
12		К	45-47
13	The copy of Writ petition No. 1094-A/2015 filed at Peshawar High court Abbottabad Bench on 16.11.2015	<b>L</b> -	48-53
14	Copies of application for leave along medical reports as well as the impugned order of compulsory retirement dated 19.01.2016.	M & M-1	54-56
15	Copy of application for copies dated	N	57

	15/12/2015		
16	Copy of the application under Right to Information Act	0	58
17	Attested copy of the order of Peshawar High court Abbottabad Bench in writ petition No. 1094-A/2015 dated 28.03.2016	P	59-64
18	copy of departmental appeal and postal receipt.	Q	65-68
19	The copy of charge report, log book, goshawara for the month of Feb, March, April & May GGPS Ghulamabad.	R	69-74
20	Vakalatnama		75

Dated: 8/6/2016

Huseena Shaheen
APPELLANT

(Haseena Shaheen) Julyah

Through counsel

Noumanullah Malik Advocate High court At Haripur.

Malik Imran Ali Advocate High court
At Haripur.

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### BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Appeal No. 615/2016

Khyber Pakhtukhwa Service Tribunal

Diary No. 600

Dated 8-6-20/6

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Haseena Shaheen PST GGPS Ghulamabad Tehsil & District Haripur c/o Rajput Nelaam Ghar near Silkway Plaza, G.T Road, Tehsil & District Haripur.

.....APPELLANT

#### Versus

- 1. The District Education officer (female)
  Haripur.
- 2. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3 Azhara Afridi ASDEO (F) Haripur.

.....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER OF RESPONDENT NO. 1 VIDE OFFICE ORDER 446-54 DATED 19/01/2016 WHEREBY THE APPELLANT WAS COMPULSOARILY RETIRED FROM SERVICE WITHOUT ANY OPPORTUNITY OF PERSONAL HEARING AND WITHOUT PROVIDING ANY FINDINGS OF INQUIRY CONDUCTED UNDER THE GUISE OF EX-PARTEE ACTION.

#### **PRAYER**

Registrar 8 6 20 H

on acceptance of instant service appeal the impugned order of respondent No. 1 vide office order 446-5 dated 19/01/2016 whereby the Appellant was compulsorily retired from service may graciously be set aside and the Appellant be reinstated on the post with full back benefits.

Respectfully Sheweth;

- 1. That the Appellant has been serving from last 27 years in Education Department and was posted as PST teacher at Government Girls Primary School Ghulamabad Tehsil & District Haripur at the time of impugned order.
- 2. That the appellant was transferred from GGPS KaKa to GGPS Awan Mohra vide order No. 2088-93 dated 08/11/2012 and later vide order No. 879-84 dated 07/11/2013 she was temporarily adjusted at GGPS Chohar Sharif. (The copies of the order No. 2088-93 dated 08/11/2012 and order No. 879-84 dated 07/11/2013 are annexed as "A & A1")
- 3. That the relieving chit of appellant Govt. Girls Primary School Chohar sharif where she relieved of charge vide order No. 3664-67 on 25.09.2014 at afternoon and she took charge under same order in GGPS Awan Mohra on 25.09.2014. (Attendance report of charge, relieving chit of GGPS Chohar Sharif and Log book of GGPS Chohar sharif are filed as "B, B1-and B2")
- 4. That the Head teacher of GGPS Ghulamabad through application to DEO (female) Haripur requested for another teacher to be posted at GGPS Ghulamabad due to need of strength of school and the appellant was adjusted at GGPS Ghulamabad on the order ADO circle. (Copy of application of Head teacher GGPS Ghulamabad is annexed as "C").

- 5. That on the direction of ADO Circle the appellant took charge on 06.02.2015 at GGPS Ghulamabad. (Copy of charge report is annexed as "D").
- That the appellant filed a complaint against respondent No. 3 the then DEO(F) Haripur for her corruption and mal practices on 15.02.2014 before Director Anti Corruption upon which the Section Officer (Complaint) Govt. of KPK Elementary & Secondary Education Department to Director E&SE KPK Peshawar for intimation and necessary action vide No. SO (Complaint) E&SED/KPK/1-7/2014/N. Moalma Haseena Shaheen dated Peshawar the December 15<sup>th</sup> 2014. (Copy of complaint along with letter is filed as "E").
- 7. That in retaliation to the complaint filed against the respondent No. 3 the appellant was transferred many times from one station to another. The transfer to GGPS Awan Mohra where the PST post does not exist, the respondent No. 3 directed the appellant to her perform duties at GGPS Ghulamabad whereas the Head teacher of the said school was stopped from taking sign on the attendance of appellant on school register, depriving appellant from her valuable rights. (Gowshawara of GGPS Awan Mohra for the month of May, 2014 is filed as "F").
- 8. That the salary of appellant for the month of June, July,
  October 2015 was stopped due to unknown reasons
  whereby appellant submitted application for release of her

salary on 11.08.2015 to respondent No. 1, the endorsement of SDO is already on application. (Copy of application for release of salary of appellant is annexed as "G").

- 9. That on the application of appellant the outstanding salary of appellant was released for two months, it is pertinent to mention that the appellant is shown as posted at GGPS Ghulamabad at the form of release of salary. (Copy of form containing release of salary of appellant is annexed as "H").
- That on 10/08/2015 the appellant was served with a show cause notice in which the allegations leveled against appellant was that appellant was transferred to GGPS Awan Mohra on 08/11/2012 whereas the appellant was serving at GGPS Ghulamabad and second allegation was the appellant remained absent from service from 01/09/2014 till 24/09/2014 for 24 days and from 21/01/2015 till 05/02/2015 for 16 days. (Copy of the show notice Endst No. 6092-93 /DEO (F) Haripur / Estb; Pry / Discpl. Action, dated 16/06/2015 is appended as "I").
- 11. That the appellant in her reply to show cause notice explained on the strength of record that the appellant was temporarily adjusted at GGPS Chohar Sharif till the further order vide order No. 879-80 dated 07/04/2013 and later, on the application of head teacher GGPS Ghulamabad the

appellant was adjusted on the order of ADO circle on 06/02/2015 at GGPS Ghulambad. The ADO circle in her annual school inspection report mentioned the name of appellant in the log book.

- 12. That on reply to allegation of absent from service the appellant explained that the applicant had submitted applications of leave along with medical reports to respondent. The applications of appellant were on medical basis which could not be rejected under the rules, even otherwise, if the application of appellant was rejected the 40 days absent could be converted into unpaid leave keeping in consideration the length of appellant service which is 27 years. (Copy of applications for leave and medical reports and other attached documents are filed as "J").
- 13. That the appellant was served with another show cause notice vide No. 7781-85/ DEO(F) Haripur / Estb; Pry/Discp.Act dated 10-08-2015. (Copy of show cause notice No. 7781-85/ DEO(F) Haripur / Estb; Pry/Discp.Act dated 10-08-2015 and reply of appellant is filed as "K").
- 14. That the salary of appellant was again illegally stopped by the respondents therefore, the appellant was left with no option but to file writ petition No. 1094-A/2015 in Peshawar High court Abbottabad Bench, seeking direction against respondents to release her outstanding salary. (The copy

of Writ petition No. 1094-A/2015 filed at Peshawar High court Abbottabad Bench on 16.11.2015 is annexed as "L").

- 15. That the appellant was on medical leave from 19.10.2015 to 20.10.2015 for two days during this time the ex-partee inquiry was mala fidely conducted against the appellant without affording her opportunity of personal hearing and in consequence whereof the appellant was compulsorily retired vide order No. 446-54 dated 19/01/2016 with effect from 19.01.2016. (Copies of application for leave along medical reports as well as the impugned order of compulsory retirement are annexed as "M & M1").
- 16. That the appellant filed an application to respondent No. 1 for provision of photocopies of inquiry report and related documents relied upon by inquiry officer on 15/12/2015 but the same was not entertained by the respondent No. 1 and appellant was not provided the required copies. (Copy of application for copies dated 15/12/2015 is annexed as "N").
- 17 That the appellant has also filed an application under KPK Right to Information Act, 2013 for complete inquiry report compiled by Inquiry Officer Mrs. Samina Mushtaq, check list 2016, annual inspection report of GGPS Awan Mohra, Log Book 2016 Awan Mohra, Gowshawar of GGPS Awan Mohra before DEO(F) Haripur but to till date the appellant

has not been provided the required information. (Copy of the application under Right to Information Act is filed as "O").

- 18. That during pendency of writ petition the appellant was compulsorily retired from service vide impugned order without releasing the salary of appellant for the months of June, July, October, November, December 2015 and January 2016.
- 19. That while disposing the writ petition the Hon'ble Peshawar High court has directed the respondent No. 2 to decide the departmental appeal of the appellant at the earliest enabling the appellant to seek remedy available to her under the law in appropriate forum. (Attested copy of the order of Peshawar High court Abbottabad Bench in writ petition No. 1094-A/2015 dated 28.03.2016 is filed as "P").
- That feeling aggrieved from impugned order, the appellant filed a departmental appeal before respondent No. 2 on 16/02/2016 with a request to set aside the impugned order and to reinstate the appellant with full back benefits (copy of departmental appeal and postal receipt is filed as "Q").
- 21. That the departmental appeal of appellant has not been decided within the statutory period of 90 days hence, this service appeal inter alia on the following grounds:-

#### GROUNDS:

- a) That the impugned order of compulsory retirement of appellant is passed in sheer violation of law and circumstances of case hence, liable to be set aside.
- b) That the appellant is compulsorily retired from service on the baseless allegations without affording her opportunity of personal hearing and without providing her the findings of inquiry report on personal grudge against appellant and with prejudice and ulterior motives and in negation of constitutional guarantees hence, liable to be set aside.
- GPS Ghulamabad and this fact was also noticed and admitted by the Inquiry officer of inquiry conducted against Azra Afridi the ASDEO (F) circle / respondent No. 3 that the appellant is performing her duties at GGPS Ghulamabad at that time. The appellant in her reply to show cause notice mentioned this fact but the respondent No. 1 while passing the impugned order has totally ignored hence, the same is liable to be discarded. (The copy of charge report is filed as "R").

- d) That the allegations of absent for 40 days from service was clearly explained by the appellant on the strength of record that the appellant was on medical leave during the course but the factum of leave was deliberately ignored by the respondent No. 1 while passing the impugned order hence, not tenable.
- e) That the impugned order lacks any sanctity on the ground that no personal hearing opportunity was afforded to appellant despite request, the appellant was condemned unheard hence, the same is liable to be brushed aside.
- f) That no departmental inquiry was ever conducted before awarding major penalty of compulsory retirement from service of appellant which was mandatory under the law.
- g) That no charge sheet was issued against the appellant with regard to allegations leveled against her.
- h) That the appellant has been serving in the education department from last 27 years and left no stone unturned to raise the literacy rate of the country and at the best performed her duties till the last date of her work but the

respondents without giving her opportunity of hearing, passed the impugned order in a slipshod, cursory and clandestine manner through ex-partee action hence, the same is liable to be set at naught.

- by the inquiry report and the record relied upon by the inquiry officer was never provided to appellant despite the fact that under the law it was the right of appellant to be provided every evidence to cross examine the same but the inquiry officer while conducting the ex-partee inquiry put the appellant deliberately in darkness and provided no opportunity of personal hearing to appellant, hence the impugned order lacks any legal sanctity and liable to be set aside.
- retirement of the appellant is a planned conspiracy of the respondent No. 1 with connivance of her blue eyed respondent No. 3 and a misuse of powers has been played against appellant, in order to illegally expel the appellant from education department thus deprived the appellant from earning bread and butter for her family.

- i) That the respondent No. 1 has passed the impugned order of compulsory retirement of appellant by putting aside all law and service rules hence, the impugned order is liable to be set aside.
- That the appellant has wrongly been charged misconduct for and mala fidely compulsorily retired from service as the appellant was serving at GGPS Ghulamabad on the very direction of the ADO circle on the application of Head teacher of GGPS Ghulamabad as well as the allegation with regard to absent from service also unfounded allegation on appellant which was properly explained the impugned order passed for victimization of appellant hence, tenable.
- k) That the statutory period of departmental appeal of 90 days has been elapsed and this service appeal is well within time.
- That this Hon'ble Tribunal has got jurisdiction to decide this appeal.

It is therefore, respectfully prayed that on acceptance of instant service appeal the impugned order of compulsory retirement of appellant may very graciously be set aside and

appellant may kindly be reinstated on service with full back benefits in the interest of justice. Any other relief this Hon'ble tribunal deems fit and proper may also be granted.

Dated: 8/6/2016

Huseenashaheen APPELLANT (Haseena Shaheen)

Through counsels

Noumanullah Malik Advocate High court At Haripur.

Malik Imran Ali Advocate High court At Haripur.

#### **Verification:**

It is verified that the contents of above memorandum of appeal are true and correct to the best of my knowledge and belief.

Dated: 8/6/2016

HUS eena shaheen APPELLANT (Haseena Shaheen)

# BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Haseena Shaheen

Vs The DEO(F) and another

## **SERVICE APPEAL**

#### **AFFIDAVIT**

I, Haseena Shaheen PST GGPS Ghulamabad Tehsil & District Haripur c/o Rajput Neelam Ghar near Silkway Plaza, G.T Road, Tehsil & District Haripur the appellant do hereby solemnly affirm and declare on oath that the contents of above tiled memorandum of appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble tribunal.

Dated: 8/6/2016

HUSeenashaheen DEPONENT

ATTESTED

Oath Commissioner

Zahoor Khan Advocate

istt. Court Peshawar

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# Mutual Transfer

The following Mutual transfer of PST (female) are hereby ordered on their own pay and grade in the interest of public service with immediate effect;-

S.No Name of Toucher & Cal 1		
A CACHEL SC SCHOOL	To	Remarks
radeom Shaneen PS1 GGPS	GGPS Awan Mohra	Vice s.no 2
Kahaka		1100 5.110 2
02 Razia Bagum PST GGPS Awan	GGPS Kahaka	447:
L Mohra		Vice s.no 1
	<del></del>	1

Note;-Charge Report should be sent to all concerned. No TA DA is allowed.

> DEPUTY DISTRICT OFFICER (FEMALE) E&S EDUCATION HARIPUR

Endst No'- LAN

Dated Haripur the <u>08/ //</u> /2012.

Copy to the;-

The Executive District Officer E & S.Education Haripur
 District Education Officer E & S Education Haripur.

3. ADO concerned

4. Head Teacher concerned.

5. Office file.

DEPUTY DISTRICT OFFICER (FEMALE) E&S EDUCATION HARIPUR

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# OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER(F)HARIPUR

Temporary Arrangement,

Mst. Hasseena Shaheen PST B-12 of Govt: Girls Primary School, Awan Mohra is berehy adjusted at GGPS, Choar Shareef on temporary basis till further order In the interest of public service,

Sub Divisional Education Officer.
Female Haripur.

Endst:No. 879-84

Dated Haripur the 67/4/ /2013

Copy for information to :-

1.The ASSECO(F) Haripur concerned circle.

2-3. The ITT of GGPS, Awan Mohra and Choar Shareef.

Sub Divisional Education Officer.

Female Haripur.

Attested Huseena Shaheen

ANNEX-B



25-9-2014 PM

willing.

JULY STORWING LEE'L

25-9-2014 3,012

Attested Huseenashaheen

Y. F.

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\* ANNEX - B Attested Huseena shaheen

ANNEX-B/2 الله من المحتددوم) ربورٹ کی رُنٹ نی میں سول افغار کل رائے/ رادرے معائن نے تو کارواز کی 1866 1660 Jay 1 Cab All Ugila l'élis e Glille 2 0/000 كنتي الم في المور الي الله عيل 12 00 00 00 Co Col Attested Is our colo Not Chaz. John Huseenashaheen Cu Chy chi jos Ilw3/2/ 1 1 pye Tydy of 13 Maislain Dip www. of www. 3 De me for som سراز کو قرا درای کاری کاری کاری

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ر محتددوم) ربورك كى رئيسى مي سكول الخيار كى م*م م*كول الفارق رائے/ دلورے معاشد نے جو کاروان کی ١٠ روكم ١٠-Jen 18/3. En 1/6/ dell we down with " 2 blet fine 10 > liere 2. vone/Sourch us clu li des Lift on die and Jeux 3, 1/3, Lin, 97}/ > Sild Clase Colle i (ve Edw Li car Lilel) ا على محدد - "محمل مندد كور دوسماني Jels 62 . Cus ción o sus · Cue Zulu Lie fit 131695 UB. Coller Ed The Clades

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ربورٹ کی روشنی میں سکول افغار کی رائے/ دلورظ معامد نے جو کاروالی کی 2 de de 12 120 1/20 سأتنس 2 July 1 1 791 dl 2 : 2, 8, & Type (3/3/ Jeles on low ! Eili out Wo Attested A Faithful dog ov 3/20 Huseenashaheen we down to be 3 pet in since is founds Essy المراش من المرادة The f ريامي الون سر وامي زاویی کی لیمراف اور اسی اولی این الماری میرالداری میرال

((3) 00) [ ] ربورٹ کی روشنی میں کول افغار تی رائع ريورط معائث Sou Sity is Lief He روار شراف ilos 18-02-2015 de HIPST Like Hill giplo Cilin SP31 Boselo PS.1 d'air. Nursery 1- 12 K. 4 15+5= 20 ore: I 200d= 3 3rd:-6 5# 3

ل انفارنی ال

ربورٹ کی روشنی میں سکول انتہار کل الماع/ داورك معاشد نے جو کاروال کی lestold web /161. Chapter J سالاك معائب (2) Jo W w Bri Ein 4 0 1/3, Cur, 203: رام المان ماني ال Lordio Jon N. Jours. لها حار والراز در ال ولارد م Attested The grand of four the Huseenashaheen Gjelo WY 26 500 dies

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( مقددی) ربورٹ کی روشنی مرسکول افغار فی راع/ راورط معائد نے جو کاروال کی Chl3, 6011/2 2 2 1 Tully أنولس العسم السي المالي العيل سياري الرأف أنتي هيل 8. 2 / ju w Cys Attested cs 5/1/3, 2013 HUSeenashaheen رياقىي 29) 36 09No 63'. Col ST Cila win will. loghuj 8-13/C/N6

الک می (محقددوم) رامع ريورك معامن نے جو کاروال کی Cues 2 du pl Reading 3. 2) Julan Measist & words 3. Cup "who his 23 CMm 43 En en 03. 9 12 05 0 blin ju. hund stud sie i 9.1 pol 9 W Sin 5.01/9, cw, i usjes Jud dem f Reacting & En روفل المارس وقوف في (2) ر الشاري کی عورتمران را و الحق العيل

رانخارتى

ربوركى روشنى مرسكول الدارقي دانع/ داورك معاشد نے بو کاروائی کی 19 Cl/3, 2' Cl/y *קינסא*עד ا ولير من نعي بنتر يا في ك ر المراع المراك (30/2) ني راست کي الله نو Attested 3 de July der en d'Islus Huseenashaheen 40/3, 20/2 des de Cliby Loulu 2 83 and 4200 The cide 50/ لوبين کيروس

((معتددو))

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( مقدوم) رائے/ راورط معائنہ نے بو کاروار کی Com At Jih or . The Com (3) (2) C161<100 Mords we " Leading " Chip. Attested Cully , wer die Measing 2 Huseenashaheen 22 0g in 0/192 اور تفری کے سوالات آرونے . وی 'L' de Cues i Cost! 2 /6 36 mg Ord Zehr A Reading & Colul

الأنسان كالمسادر المقدوم)

ئى مىركىول انغيار كى ئى مىركىول انغيار كى

رائے/ ربورے معائنہ della cula. C/2/1/2/ Zhroji je v 2 spelling 3 ر العالس Oberd vowels 3 3 cup رکھنے میں میں کوں کے علاوں ما کی Logip de in en B i O's sélip. is a Colorist Co Readity's Cv) i (36 36 09 16 03). الحق المر اور المرك المرك المركان (10) 1 mb an 2 class 200 1 وراقعن ص

الآل ما مكان ( محصدوم) ربورٹ کی رُن<sup>ین</sup>ی میرسکول افغا<sup>ر با</sup> نے بوکار واڑ کی ر بورط معائث 3)//g/ Jule. GUI JUST مر في أو زون ك رسان م IN Of CUZWA CO ZOW Attested ركى ميلائے تعین Huseenashaheen (19/1/3' 3/ 3/ 1/1/5 / 03. is 2 mlo 7,000 0,000 / mls and وله الراون سي من ولي الراد One Zelow his fire 26 m Cin 3 2 ch q w/ معیں ورس سی ملی اور ہڑھ سكر هن

( معددوم) المعالمة ا Copy 193 Som 1 ( P. of ( 4. 9) dingplo - Cepuil K9 - 45 one= 2001 = 6  $3nd = \frac{2}{3}$ 

ANNEW-C

Attested Huseena shaheen

ANNEX -D المراج في الموس المراج من المراج الم 2 V1 (04 J por / / / / / / / / / / 2-2-2-15 2 / 2-1-05 82011105

> Attested Huseena shaheen

GOVERNMENT OF KHYBER PAKHTUNKHWA



# ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(Complaint)E&SED/KPK/1-7/2014/N. Moalma Hascena Shahcen Dated Peshawar the December 15th, 2014

The Director,

Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

Subject: -

APPLICATION/COMPLAINT

I am directed to refer to the subject noted above and to enclose herewith an application/complaint alongwith its enclosure received from Naib Muallama Haseena Shaheen PST (BPS - 12) GGPS, Awaan Mouhra, Tehsil & District Haripur addressed to the Secretary E&SE, Khyber Pakhtunkhwa, Peshawar for further necessary action under

Ensins Above:

· (NASRULLAH) SECTION OFFICER (COMPLAINT)

## Endst: of even number & date:

Copy of the above is forwarded to the:-

Mr. Mukkaram Khan, Deputy Chairman, Chief Minister's Complaint & Redressal Cell, Chief Minister's Secretariat, Khyber Pakhtunkhwa, Peshawar w/r to his letter

SECTION OFFICER (COMPLAINT)

Alested roshored

# البيل بنام دّانيراندَخر الشنى كريشن ١٨٩٨

جناب عالى!

گذراش خدمت ہے کہ میں معلّمہ حسینہ شاھین PST اور بنمنٹ گرلز پرائمری سکول اعوان موہڑ پخصیل وضلع ہری پور کے پی ے میں اپنے فرائض منصی سرانجام دے رہی ہوں، جناب عالی اسب سے پہلے سا اُلفہ آڈٹ آفٹ آفیسر باسط شلع ہری اپور کے پی کے اور ڈائیر یکٹرا بجو کیشن پیثاور DEO ایس ڈی اوز نانند مدارس ہری پوراور ADO پھر ہالہ سرکل ہری پورٹے بیرواضح کیا جائے کہ آ ڈٹ پیرا جو کہ ADO سرکل اور ڈسٹر کٹ آڈٹ آفیسر نے 28/11/2012 کی میٹنگ کے بعد مرتب کیا ADO نے کمٹ ٹاریخ کوجھوٹی اور فرضی رپورٹ مرتب کی اور جس کی بناء پر کہکہ الكاش ميزيم برائمري سكول كى 3معلمات بر 580,834 كى جعلى اور فرضى ريكولى ۋالى گئى، جن ميس ميس بھى شامل ہون، مجھ برجعلى اور فرضى -/130,593 روپے ڈالے گئے ADO سرکل کی رپورٹ کی تاریخ کی تفصیل پیش کی جائے۔ سب سے پہلے میدوائع کیا جائے کہ 2010اور 2011ان دوسالوں کی غیر حاضریاں پیش کی جائیں۔ اگاؤٹ آفس طع ہری پوری طرف سے 2سال کی غیر حاضریوں پرسٹاپ کی جانے والی Monthly Pay stop کا شیوت 2010 اور 2011 کا بیش کیا جائے ،میر نے پاس 2010 اور 2011 ان دوسالوں کی حاضر یول کے ممل ثبوت موجود میں، میں 2010 میں نزتویہ پرائمری سکول میں أپورے سال حاضرتنی ، اِس طرح مهمکه پرائمری سکول میں بھی پوراسال حاضرتنی ، بمطابق سول سرون 1973 ایک کے تحت کیا ADO سرکل نے مجھے کوئی تندید ، شوکارنوٹس یا Explanation کیلئے مجھے طلب کیا۔ میرے پاس واضح شوت موجود ہے کہ ADO سرکل نے 10/11/2011 کو کہا۔ انگٹن بڑا تمری سکول کا معاشہ کیا، میں دوران معاشہ لڑ کیوں کو بڑھانے میں مصروف کارتھی ،مصروف ہونے کی وجہ سے رجٹر معلمین پر جھ سے حاضری نہیں لگائی جاگی ، جسکا اعتراف ADO سرکل نے رجٹر معلمین نے 10/11/2011 كے صفحہ پركيا ہے كہ معلّمہ بچوں كو پڑھانے أيس مصروف كارتھى ، جس كى أجبه سے رجس پر ساخرى ندلگا سكى ،اس كا مطلب ميہ ہے كہ ميں سکول میں حاضرتھی ، بمطابق ADO پھر ہالدسرکل میں اظہرہ آفریدی اور 2010 اور 11 وی کاعرصہ بغیر کسی غیر حاضری کے مجھ پر کیسے ڈالا گیا۔ اپیل کیساتھ فوٹو کا پی ثبوت کے طور پر لف کر رہی ہوں ، میں نے ڈ1 20/06/20 کوڈائیر ایکوکیشٹ پٹنا در کے آفس میں جعلی فرغنی کیس کے بارے ميں اپني ائيل جمع كراوكي تى جس پر تا حال كوكي بھي كارواكي على مين نه لائي كئ اوراى الرح مين في 101/11/2013 كورفتر هد DEO زمانه مدارس برى يوريس ابيل جمع كرواكي تقى ، جس بِرتا حال كُوكَ على أُدِياً مدنه وسكا -16/04/2013 كوييرُّرونتر هذا DEO زناند مدارس برى يوريس ابيل جمع کروائی تھی ،جس پر تا عال کوئی عمل درآ مدند، وسکا ، 28/08/2013 کو میں نے جھوٹی ریکورٹی کیس کے بارے میں درخواست دی ،جس میز SDEO زنانه مدارس ہری پورنے تا حال اس کا بھی توکش نیٹ کیا یا 12/09/2011 کودفتر هذا DEO زنانه مدارس ہری پوریس اپیل جمع کروا کی تھی ا جس يربهي تا حال كوني عمل درآ مدنه وسكاب

ڈائیر کیٹرا بچوکیشن پٹاور DEO, SDEO, SDEO کوشیت مالیک کا جائیں کے مسافلہ کا جائے گہ سافلہ ہو آفریدی نے ADO کوشیت سے مستاری نے سابقہ ADO کوشیت کا آغاز کیا،اور ADO پھر الرس کے سابقہ ADO کوشیت سے این ملازمت کا آغاز کیا،اور 2010 کو ADO کوشیت سے این ملازمت کا آغاز کیا ہے، جبکہ ADO اظہرہ آفریدی نے مسافلہ کو کا جھوٹا عرصہ اور مسافلہ کا مسافلہ آفریدی نے اور جھوٹا عرصہ والا ہے، جبکہ 2010 میں اظہرہ آفریدی نے این ڈیوٹی جوائن ہی مدی تھیں کیسے شافل کیا ہے، اور جھوٹا عرصہ والا ہے، جبکہ 2010 میں سافلہ ہو آفریدی نے این ڈیوٹی جوائن ہی مدی تھی سافلہ کا آغاز کو کھوٹا کو کھوٹا عرصہ والا ہے، جبکہ 2010 میں سافلہ ہو آفریدی کی جائے اور مرتکب افراد کو کیفر کردار تک جھوٹا جو سے سافلہ کے اور مرتکب افراد کو کیفر کردار تک جھوٹا کو مدر تیں میرا بتادلہ کہا کہ سکول سے اعوان موہر ہو میں ہوگیا تھا،اور 2012 کے آخریس میرا بتادلہ کہا کہ سکول سے اعوان موہر ہو میں ہوگیا تھا۔ ( ثبوت کے طور پرفوٹوکا کی لف خدمت ہے۔

Attested Hiseenashaheen ۔ 24/08/2013 کور یکوری شاپ کرنے کیلئے سروس ٹر بینل میں کیس دائر کیا گیا سب سے جران کن بات بیہ کہ جس جعلی اور فرضی ریورٹ کی بنیاد پر ب گناہ معلمات پر جعلی اور فرضی ریکوری ڈائی گئی، اُس تفقیثی آفیسر کا نام ریکوری کیس بین نہیں ڈالا گیا، کیونکدریکوری السک رپورٹ کی بنیاد پر ب گناہ معلمات پر جعلی اور فرضی ریکوری ڈائی گئی، اُس کے ساتھ ADO نے اصافی کو کہا میں شامل ایک ڈیفا لٹر سعد سے محفوظ جس کا بھائی روز نامہ شال کا صحافی ہے کہ بین تحواری بہن کوسکیل و بی ہوئی آپ میرانام ریکوری کیس میں نے النین ، آخر ویٹی ہوا ADO کا نام مقدمہ سے باہر رکھا گیا ہے، صحافی کا کہنا ہے کہ بین تحواری بہن کوسکیل و بی ہوئی آپ میرانام ریکوری ڈائی گئی، جس کی دھیا ہے معلمات متاثر ہوئی آخر اُس کا نام کیون نہیں شامل کی بہن کو 2012 میں سکیل دے دیا گیا ہے ، جس کا ٹوٹس ایک فرضی اور جعلی کے مطابقہ متاثر ہوئی آخر اُس کا نام کیون نہیں شامل کی ایکا میں جس جعلی ریورٹ پر ریکوری ڈائی گئی، جس کی دھیا ہے معلمات متاثر ہوئی آخر اُس کا نام کیون نہیں شامل کی خواج کے متاثر ہوئی آخر اُس کا نام کیون فرضی اور جعلی کی ایکا گئی۔ ہوئی کی جانے ، تا کہ آئیندہ ایسا کوئی فرضی اور جعلی کاروائی میں بیا ہے ۔ ہاری آپ سے التجاء ہے کہ اللے اُس کی میں ڈیٹ کی خواج کے متاثر کا کہنا ہے کہ کاروائی میں بیا ہے ۔ ہاری آپ سے التجاء ہے کہ اللے کاروائی میں بیا ہے۔ ۔ ہاری آپ سے التجاء ہے کہ اُس کا کہنا ہیا گئی ہیں بیا گئی ہیں نہ آگے۔ کاروائی میں نہ آگے۔ کاروائی میں نہ آگے۔ کاروائی میں نہ آگے۔ کاروائی میں نہ آپ کے کہنا کو نام کی کاروائی میں نہ آگے۔ کاروائی میں نہ آگے۔ کاروائی میں نہ آگے۔ کی کی ڈونس کی دونس کی دون

نومينيكيشن SO(D&A) / 1-18/E&SE/2012 اس نومينيكيشن كي تحت 11/07/2012 كوايك فرضى دُيفالنُرلست میں شامل سعد بیر محفوظ ، جس کا سیریل نمبر 140اور سینارٹی نمبر 888ہے اور اپنی فرضی ڈیفالٹر لسٹ میں میرا بھی نام شامل تھا لیکن 11/07/2012 كو15 سكيل سے مجھے جان بوجھ كرمحروم كيا كيا ورمير بساتھ شامل سعديد محفوظ كو 14 وال سكيل دے ديا كيا، ميرى سینارٹی فائل اورسروس بککو ADO مس اظہرہ آفریدی نے جان بوچھ کرغائب کر دیا تھا، سکیل دینے کے وقت جس کے لیئے میں نے ڈپٹ كمشنر شكايت سيل هرى بور ميں اپنى سينار فى فَائل اور سروَنْ بَكِ فَى بَرَالْدَى مَسْ لِيعَ 109/09/20 كودفتر هذا ميں اپنى درخواست جمع كراكى تھی۔ ( ثبوت کے طور پر فوٹ کا پی لف خدمت ہے ) آ ترکار 02/10/2013 کو بھی Removed کی ہوئی Removed کی ہوئی اور سروس بک Anti Cruption Officer Circle Haripur کرزاہد صاحب کی مسلسل کوششوں کے بعد مجھے میری سینارٹی فائل اورسروس بك Remove كى بوئى ملى ، جس كومس اظهره آفريدى نے رشوت ندد لينے كى وجہ سے دانسته طور پر remove كيا۔ بھ ہے جونیر معلمات کو 15 ویں سکیل سے نواز آگیا، جن میں من شازیہ اختر ولدراجہ محداختر اُخان من نیر سلطانہ ولدستیہ عارف حسین شاہ ، جو کہ مجھے جونیر تھی۔ میں سینیر ہونے کے باوجود بھی 15 ویں سکیل ہے مس اظہرہ آفریدی کے ہاتھوں جان بوجھ کرمحروم کی گئی۔ ( ثبوت کے طور پرفوٹو کا پی لف خدمت ہے) ۔اس سلسلہ میں میں نے اپنی اپیل ڈائیر یکٹرا بجو کیٹا نیشاور کو 36/06/201 کو 15 ویں سکیل کے لیے جمع کرائی تھی ۔جس پر تا حال کوئی نوٹس نہیں لیا گیا۔ اور اس طرح دفتر هذا EO صلحبہ زنانیہ مدارس ہری بور 04/11/2013 کو 16/04/2013ء میں سکیل کے لیتے اپنی الیل جمع کرائی تھی جس پر کوئی بھی نوٹس نہیں لیا گیا۔ اور اس طرح میں نے 16/04/2013ء 28/08/2013 ، 12/09/2014 كووفتر هذا من 15 وي سكيل كے ليئے اللي جن كرائي تى جس برتا عال كوئى نوس نه ليا كيا-میری سروس اس وقت 26 سال میں داخل ہو چی ہے، میں BA ہون اور ساتھ PTe کی ہوئی ہے، اس کے باوجود جھے جونیز کو 15 وال سکیل دے دیا گیارشوت نددینے کی وجہ ہے۔ دوسری بار پھر مجھے BPS-15 سے محروم کیا گیامیرا نام سینار فی لسٹ میں شامل تھا۔میرا سینارٹی نمبر 346 اورسیریل نمبر 322 ہے۔ میرا ڈفر کا کیس تھا، میری فائل اور سڑوی بک پہلے ہی ہے ADO پیٹر ہالہ سرکل نے وستخط کر کے بابوصاحبان کے حوالے کردی تھی۔ بمطابق سپر بنٹنڈنٹ بشرصاحب فی کہاہے کہ میں نے ADO سے از کرآپ کے سکیل کا مقدمہ جیتا ہے، كونكه ADOر يكورى والى معلمات كو 15 وال ملكيل تبين ويناجات في - كونكه اس يبليد 07/11/2012 كوايك ويفالطراست ميس شائل معلماه جس كاسير بل نمبر 140 اورسينار في نمبر 888 هيأ أن كو 14 وان سكيل ديا كيا أور ADO وغيره كمن ريكوري كيس كي بات كرتي ہے۔اں بار بھی ADOs اور کلرک ساحبان نے ملکر میری سینار ٹی فائل اور سروٹ بک کوڈائیر یکٹریشاور کے سامنے ڈی لی سی کے وقت میش

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باوجود 15 سکیل سے جان ہو جھرکرکارک صاحبان اور ADO مرکل کی مہر بانیوں اور Pre Planing باعث دوسری بار 16 ویں ملطانہ کو ملیل سے محروم کیا گیا۔ میری اس وقت 26سال سروی ہوگئ ہے، میں PTC، B.A ہوں اور مجھ سے جونیئر شازید اختر، نیئر سلطانہ کو 12/09/2014 کو گھر 12/09/2014 کو گھر 108/12/2014 کو 13 سکیل کے لیئے DEO آفن میں ایک کی ہے، اس کے کوئی میں ایک کی ہے، اس کے کوئی میں ایک کی ہے، اس کے کیشن بیثا ور، ایس ڈی ای اواور ADO اور سرنت نشر صاحب سے معاملے کے بارے میں انکوائری کی جائے، اس سے پہلے میں نے 13 06/06/2013 06/06/2013 04/11/2013 بیشر صاحب سے معاملے کے بارے میں انکوائری کی جائے، اس سے پہلے میں نے 13/09/2013 06/06/2013 04/11/2013 کو 15 ویس سکیل کے لیئے اپیلیں جمع کرائی تھیں، جن برنا حال کوئی میں درآ مدنہ ہوسکا۔ (ثبوت کے طور تو تو کا لی لف کردہی ہوں)۔

میری اس وقت پھر ہالہ سرکل میں 11 سال کے قریب عرصہ ہو گیاہے، اور مجھے تا حال کی بھی جگہ پر تبدیل نہیں کیا گیاہے، میڈیکل پیش کرنے کے باجود ، منسٹر سے کھوانے کے باوجود ADOاورODاور دائیر یکٹرا بچوکیٹن جان بوجھ کرمیرا تبادلہٰ بیں کررہے ہیں۔ ( جبوت کے طور پر تبادے بردی جانے والی درخواست کی فوٹو کا بیاں لف خدمت ہیں )۔

24/05/2011 کے سرک اور انگلش میڈیم کہلہ پرائمری سکول میں منطور کی ہوئی پڑھی آبوئی است وفتر ہذا DEO آفس ہری ایراور ADO پر المحر ہالے مرک اور انگلش میڈیم کہلہ پرائمری سکول میں منطور کی ہوئی پڑھی آبوئی آبوئی میں استحقاقیہ کی درخواست کوغائب کرواد دیا تھا ہے ہوئی المجھوٹی اجھوٹی المجھوٹی المجھوٹی المجھوٹی المجھوٹی المجھوٹی المجھوٹی المجھوٹی المجھوٹی المجھوٹی کے این 20 دن کی چھٹیوں کی تفصیل میری مربے سروس بک میں انٹری ہوئی تھی ، جس کی وجہ سے میری بچیت ہوگئی، رخصت استحقاقیہ درخواست کے بارے میں ADO اور ہیڈ مسٹریس مربے سروس بک میں انٹری ہوئی تھی ، جس کی وجہ سے میری بچیت ہوگئی، رخصت استحقاقیہ درخواست کے بارے میں مربی برائی مربی کے مربی کے مربی کی موجود کے دوخواست جمع کروائی تھی اُس پر کوئی نوٹس نیس لیا گیا۔ Red Entery کی دھمکی میں موجود ہے۔ (فوٹ وکا پی درخواست جمع کروائی تھی اُس پر کوئی نوٹس نیس لیا گیا۔ Red Entery کی گئیگ موجود ہے۔ (فوٹ وکا پی درخواست ہے)۔

چیر مین تریک انصاف عمران خان کے ایڈر کی پر بھی اپنے حق کے لیئے درخواست بھیجی تھی ایکن دہاں سے بھی ابھی تک کوئی جواب نہیں آیا ہے۔ ( ثبوت کے طور پرفوٹو کا پی لف خدمت ہے )۔

# ADO پھر ہالدسركل كے اعتراضات:

جواب: جہاں تک آؤٹ پیرا میں اُٹھائے جانے والے اعتراضات کا میں اس طرح جواب دیتی ہوں، میں لگا تار 2 سال نزلو پہ پرائمری سکول اور کہکہ پرائمری سکول میں جاضر تھی، جس کا ثبوت میں آپیل کے ساتھ لف کر رہی ہوں۔ ریز لٹ کا تعلق 2010 اور 2011 کے ساتھ نہیں آتا ہے، جبکہ امتحان 2012 مارچ کے مہینے میں ہوئے ، تو کے ساتھ نہیں آتا ہے، کیونکہ مس اظہرہ آفریدی نے جبوٹے اور جعلی 2010 اور 2011 کی ریز لٹ رپورٹ مرتب کی ۔ اور اپنی طرف سے فرض والدین گونسل میں شامل کیئے جانے والے جبوٹے افراد کے دستھا جیلی اور نوشی ریز لٹ رپورٹ مرتب کی ۔ اور اپنی طرف سے فرض والدین

PST - BPS- الانتاثينية المارد 1-320-خدا كالدانة الأراك كأحداد في المعلى ليدارة الماء والمعادة والمائدة المعادة والمعادة والمعادة والمعادة والمعادة でき出ていいないからいとこれがあるいはないからはないというないとこれいらいというにないからいいというというというによっているというになっているというによっているといっというによっているといっというによっているというになっているというによっているというになっているというになっているというになっているというになっているといっというになっているというになっているというになっているというになっているというになっているといっといっというになっているといっというになっているといっというになっているといっというになっているといっというになっているといっというになっているといっといっというになっているといっというになっているといっというになっているといっというになっているといっというになっているといっといっといっといっというになっているといっというになっているといっといっというになっているといっというになっているといっといっといっといっといっというになっているといっというになっているというになっているといっというになっているといっというになっていることにはなっているというになっていることにはなっているというになっていることになっていることにはないることにはないることにはないることにはないではないることにはなることにはなることにはないることにはなる。ことにはなることにはなることにはなる。ことにはなることに

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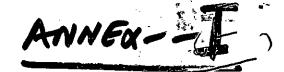
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### OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) **HARIPUR**

(Office Phone No. 0995-613244 Fax No. 0995-615140)

### SHOW CAUSE NOTICE

- I, Miss Naheed Anjum District Education Officer (F) Haripur, as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve upon you, Mst Haseena Shaheen PST GGPS Awan Mohra Distt Haripur as follows:
- 1: (i). Whereas, as per report of the IMU E & SE Haripur, for the month of April 2015 you had been transferred to GGPS Awan Mohra vide this office order No 2088-93 dated 08/11/2012. However, you have not complied with the order and are still teaching at GGPS Ghulam Abad without any order.
- (ii) Whereas, an inquiry was conducted against Mst Azra Afridi ASDEO (F) Circle at your complaint, the inquiry officer has concluded that You remained willfully absent from duty from 1-9-2014 to 24-9-2014, (24 days) and again from 21-1-2015 to 5-2-2015 (16 days) and
- (ii) on going through the findings and recommendations of the inquiry officer, the material on record and other connected papers including your defence before the inquiry officer,

I am satisfied that you have committed the following acts/omissions specified in rule 3 of the said rules:

- (a). You are guilty of willful absenteeism and Misconduct,
- As a result thereof, I as the competent authority, have tentatively decided to impose upon you one of the major or minor penalties under rule-4 of the said rules.
- You are, therefore, required to show cause as to why the aforesaid penalty/penalties should not be imposed upon you and also intimate whether you desire to be heard in person.
- If no reply to this notice is received within 15 days of its delivery, it shall be presumed that you have no defense to put in and in that case Ex-Parte action shall be taken against you.

District Education Officer (Female) 6/18 Haripur

(Competent Authority)

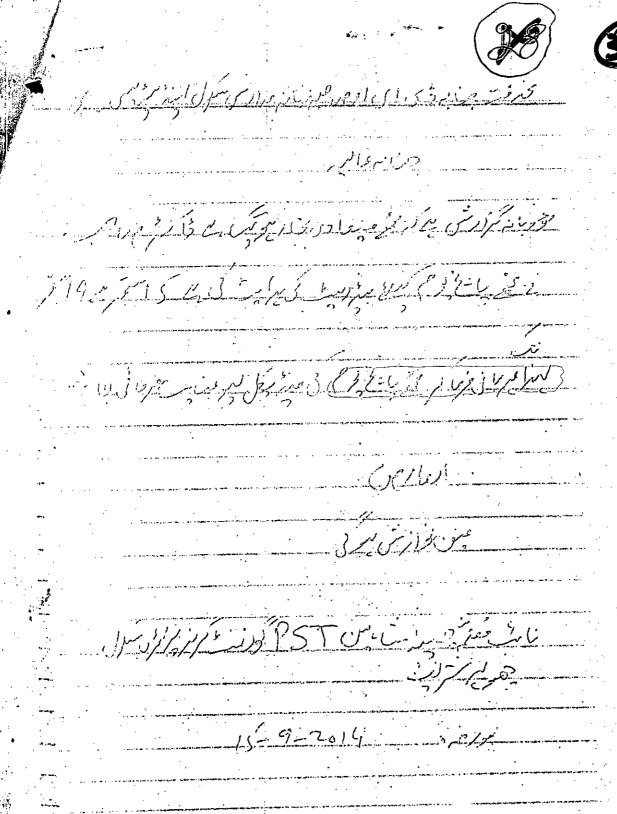
DEO (F) Haripur/Estb; Pry /Discp. Action, Dated Harip ir the 16 /06/2015 Copy of the above is forwarded for information to the: -

- 1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Sub Divisional Educational Officer (F) Sub Division concerned.
- 3. Assistant Sub Divisional Educational Officer (F) Circle concernec.
- 4. PSHT GGPS Awan Mohra Haripur.
  - 5. Master File.

Mst Haseena Shaheen PST GGPS Awan Mohra

Attested Huseena Shaheen

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Near Sheramwala Gate, Wohallah Khoo, West Circular Road, Haripur. Contact: 0313-5218113

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# TNNEX-K

## OFFICE OF THE

## DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR

(Office Phone No. 0995-613244 Fax No. 0995-615140)

To

No. 7780 Dt. 10-8

Mst Haseena Shaheen PST GGPS Awan Mohra Haripur

Subject:-Memo.

SHOW CAUSE NOTICE

Reference your reply to the show cause notice served upon you by this office vide No. 6092-93 dated 16-06-2015 in connection with your willful absenteeism, it is stated that you have \$ badly failed to show cause to the allegations/omissions mentioned in the notice. Your reply is just

Therefore you are once again directed to show cause as to why one or more penalties should not be imposed upon you under rule, 4 of the Khyber Pakhtunkhwa government servants (Efficiency and Discipline) Rules, 2011.

If no reply to this reminder is received within 07 days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you under the ibid rules which may result in your dismissal from government service.

(Copy of the show cause notice is attached herewith)

(Naheed Anjum) District Education Officer (Female) Haripur Competent Authority

7781-85

\_/DEO (F)/Haripur/Estb; Pry/Disco Act Dated; Haripur the Copy forwarded for information to the:-

1. Director E&S Education Khyber Pakhtunkhwa Peshawar. 2. Deputy Commissioner Haripur.

3. District Monitoring Officer E & SE Haripur.

4. SDEO (F) Haripur.

5. ASDEO (F) Circle concerned.

6. M/File.

District Education Officer (Female)

Haripur

Attested Huseenashaheen

Mst Haseena Shaheen PST GGPS Awan Mohra Haripu-





### OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR

(Office Phone No. 0995-613244 Fax No. 0995-615140)

No-7775 Dt. 108

To

Sub Divisional Education Officer (F)

Haripur

Subject; Memo.

REMINDER / SHOW CAUSE NOTICE

Enclosed please find herewith a reminder in duplicate regarding show cause notice served upon Mst Haseena Shaheen PST GGPS Awan Mohra Haripur. You are directed to hand over one copy to the teacher concerned and get her signature on the other one as a receipt, for early return to this office.

> (Naheed Anjum) District Education Officer (Female) Haripur Competent Authority

\_\_/DEO (F)/Haripur/Estb;Pry/Discp Act Dated; Haripur the Copy forwarded for information to the:-

1. Director E&S Education Khyber Pakhtunkhwa Peshawar.

2. Deputy Commissioner Haripur.

3. District Monitoring Officer E & SE Haripur.

4. M/File.

Dowly No.66 dt. 10-8-15.

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District Education Officer (Female) Haripur

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> Attested HWeena shaheen

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### BEFORE THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH

W.P No.	٠.	-A/2015
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Haseena Shaheen, PST GGPS Ghulamabad, Tehsil & District, Haripur.

...PETITIONER

#### **VERSUS**

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

...RESPONDENTS

## WRIT PETITION

#### <u>NDEX</u>

<b>S.</b> #	Description * **	Page No.	Annexure
1.	Writ petition along with affidavit & Certificate	1 to 9	
2.	List of Books	-> 10	
3.	Addresses of the parties	1	-
4.	Copy of order	李122-	"A"
5.	Copy of order dated 07/11/2013	F-13-	"B"
6.	Copies of application and charge	141315	"C"
7.	Copies of the application and release order	16to17	<b>'Þ</b> '' & "E"
8.	Copy of show cause notice and relevant record	18 to 43	"F"
9.	Copy of application	- 44-	"G"
10.	Court Fee worth of Stamp paper Rs. 500/-		
11.	Wakalatnama.		

...PETITIONER

Dated: 06/11/2015

Through;

(Abdul Aziz Khan Tanoli) Advocate High Court Abbottabad

### BEFORE THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

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W.P No.			1 11 12 0 1 2

Haseena Shaheen, PST GGPS Ghulamabad, Tehsil & District, Haripur.

...PETITIONER

#### **VERSUS**

- 1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. Executive & District Education Officer (F), Haripur.
- 3. Sub-Divisional District Education Officer (F), Haripur.

...RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973, AS AMENDED UPTO DATE WITH ARTICLE 3, 11, 9 AND 29 FOR DECLARATION TO THE EFFECT THAT ACT AND ACTION OF THE RESPONDENTS REGARDING NON-PAYMENT, STOPPING THE SALARY OF THE PETITIONER



FOR THE MONTHS OF JUNE, JULY & OCTOBER, 2015 WAS CONTRARY TO PRINCIPLE OF POLICE LAW AND FUNDAMENTAL RIGHTS OF THE PETITIONER.

PRAYER: ON ACCEPTANCE OF INSTANT WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE ORDER/ DIRECTED TO RELEASE THE SALARY OF THE PETITIONER IMMEDIATELY FURTHERMORE RESPONDENTS MAY ALSO KINDLY BE DIRECTED TO ADJUST THE PETITIONER ON REGULAR BASIS. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM FIT AND APPROPRIATE MAY ALSO BE AWARDED PLEASE IN THE INTEREST OF JUSTICE.

Respectfully Sheweth: -

Brief facts giving rise to the instant writ petition are as under;-

1. That the petitioner is rendering her services in Education Department as a PST Teacher for last 27 years.



- 2. That petitioner through order Endst No. 2088-93 dated 08/11/2012 was mutually transfer from GGPS Kahka to GGPS Awan Mura. Copy of order is annexed as Annexure "A".
- 3. That the petitioner was adjusted at GGPS Choar Shareef on temporary basis through Endst No. 879-84 dated 07/11/2013. Copy of order dated 07/11/2013 is annexed as Annexure "B".
- 4. That on the application of Head Teacher GGPS Ghulamabad petitioner was adjusted through verbally order in the said school, and petitioner took over the charge of the post and started the duty. Copies of application and charge are annexed as Annexure "C".
- 5. That the respondents previously stop the salary of the petitioner due to unknown reason and petitioner submitted application to SDEO (F)

  Haripur to release her salary, which was released on month of August, 2015 by respondent No. 3.

  Copies of the application and release order are annexed as Annexure "D" & "E".

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That the petitioner was issued show cause notice by the respondents on the basis of malafide and personal grudge which is pending. Furthermore the petitioner has already been submitted detail reply of the sause alongwith sufficient proof to respondent. Copy of show cause notice and relevant record is annexed as Annexure "F".

That respondents again stopped the salary of the petitioner for months of June, July & October, 2015 without giving any written order or without any reason, just to humiliate the petitioner.

That the petitioner submitted application for written order regarding withholding/ stopping of salary, but no order was given to the petitioner till now. Copy of application is annexed as Annexure "G".

That there is no other efficacious remedy except this writ petition is available to the petitioner.

Therefore, petitioner filed this writ petition, interalia, on the following grounds;-

#### **GROUNDS:-**

- a. That the non-payment of salary of the petitioner by the respondent is merely colourful exercise of the power, which is fancifull illegal, unlawful and not sustainable in the eye of law.
- b. That the respondents have not issued any written order regarding stopping of salary of petitioner. Salary of petitioner in circumstance was stopped without any lawful justification. Furthermore the petitioner and her family members had been deprived their bread and butter, which is against the fundamental rights of the petitioner granted by the constitution, hence not sustainable in the eyes of law.
- c. That the respondent No. 3 stop the salary of the petitioner just to take revenge. As petitioner submitted a complaint against here before NAB department. Therefore, the



act and action to stop the salary of petitioner is based on personal grudge, fanciful, illegal without lawful authority.

- That the respondents many time transferred the petitioner in short span of time from one school to other. So much so the petitioner was transferred, where, there the post of PST does not exist i.e Awan Mura. Furthermore the petitioner was directed by the respondent for performing her duty in GGPS Ghulamabad, where the Head Master of the said school was stopped by respondent No. 3, not to take are singed the attendance of petitioner in school, this act of the respondent is highly illegal, unlawful, arbitrary, and without lawful authority.
- e. That court fee stamp paper worth Rs. 500/- is affixed.

It is, therefore, respectfully prayed that on acceptance of instant writ petition, respondents may



graciously be order/ directed to pay/ release the salary of the petitioner immediately the furthermore respondents may also be directed to adjust the petitioner on regular basis. Any other relief which this Honourable Court deem fit and appropriate may also be awarded please in the interest of justice.

#### INTÈRIM RELIEF;-

It is, therefore, respectfully prayed that on granting of interim relief respondents may graciously be directed for release of salary of the petitioner till the final disposal of instant writ petition.

...PETITIONER

Through;

Dated: 06/11/2015

(Abdul Aziz Khan Tanoli) Advocate High Court Abbottabad

#### **VERIFICATION: -**

Verified on oath that the contents of forgoing writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

Huseenashaheen ...PETITIONER



# OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR



(Office Phone No. 0995-613244 Fax No. 0995-615140)

#### **NOTIFICATION:**

1. Whereas, <u>Mst: Haseena Shaheen PST GGPS Awan Mohra District Haripur</u> was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules-2011, on the charges of willful absenteeism from her duty.

2. And Whereas, show cause notices were served upon Mst: Haseena Shaheen PST GGPS Awan Mohra Haripur at her home address vide this office No. 6092-93/DEO(F) Haripur/Estb: Pry/Discpl Action dated 16/06/2015, 7781-85 DEO(F) Haripur/Estb: Pry/Discpl Act dated 10/08/2015, 7838 dated 12/08/2015, 18466-70 / DEO(F) Haripur/Estb: Pry/Discpl Action dated 21/08/2015 & 14247-51 DEO(F) Haripur/Estab: Pri/Haseena Shaheen dated 04/12/2015 for resuming her duty within Seven (7) days of the issuance of the notices.

3. And Whereas Mst: Samina Mushtaq Principal GGHS Sarai Selah was appointed as inquiry officer vide this office notification No. 9332/DEO(F)Haripur/Estb: Pry /Discip Act dated 05/10/2015.

4. And Whereas the inquiry officer after having examine the charges, evidence on the record submitted the report vide letter No. 165 /Inquiry/File dated 20/10/2015

record submittedthe report vide letter No. 165 /Inquiry/File dated 20/10/2015.

5. And Whereas, Mst: Haseena Shaheen PST GGPS Awan Mohra Haripur was called for personal hearing vide letter No.9129 dated 22-09-2015 and 14440 dated 11-12-2015. However she badly failed to appear before the authority within the stipulated time and hence rendered herself liable to an ex- parte action.

6. And Whereas, The authority having considered the charges, evidence on the record as per report of inquiry officer , ASDEO (F) Circle Pharhalla, SDEO (F) Haripur and giving the opportunity of personal hearing /appearing in person, to the accused teacher, is of the

view that the charges leveled against her have been proved.

7. Now, Therefore, in exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules 2011, rule 4 ((b (iv), the Competent authority is pleased to impose the Major Penalty Of Compulsory Retirement From Service, upon Mst: Haseena Shaheen PST GGPS Awan Mohra Haripur with immediate effect.

(Naheed Anjum)
District Education Officer (Female)
Haripur
(Competent authority)

446-54

Endst; No\_\_/DEO (F) Haripur/Estab;Pry /Haseena shaeen PST,Dated Haripur the 19\_/01/2016 Copy forwarded for information and n/action to the;

1. Director E &S Education Khyber Pakhtunkhwa Peshawar.

2. Deputy Commissioner Haripur.

3. Senior District Accounts Officer Haripur.

- 4. SDEO (F) Haripur with the directions to make necessary arrangements for the recovery of the whole pecuniary losses caused to Government Exchequer by receiving salary and allowances during the absence period.
- 5. District Monitoring Officer E & SE Haripur.

6. ASDEO (F) Circle concerned.

- 7. Primary School Head Teacher GGPS Awan Mohra Haripur.
- 8. Mst Haseena Shaheen PST GGPS Awan Mohra Haripur.

9. ADO Estab Primary Local Office.

10. Master File.

Attested Huseenashaheen

District Education Officer (Female) Haripur

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Miller Special Sold ANNEX-N عنوان، در واست برا نامول انواری امیرسری افز اکواری انبرای برخت ق صول نامبری مدم موج دکی بر انبوائر کا اسلام کا أن أيسم فولو أليا للاست مرد في والس وي المواران المنظر من الدر آر در آر منت ال مناس الموارا الدور المراس ومرا مر مور کی میں اندان میں کا کی اسٹی کو کو کا دیاں دیاست فرما ڈی کی المرس المراس المراس المراس المرس ال 1-113000 11 82015 J/100 U/ 1/2 V30 John 31 نا بنسم ورز ترون المن و کورز از الزار الزار المان و کورز المن و کورز المران عندی الم 15 12 in Attested Rocemod 12 M. Sauro 12 HUseenashaheen

عول و له المعلى المولاد المعلى المعل

مود بانه گزارش ہے کہ میں معلّمہ حسینہ شاہین PST (BPS-12) گورنمنٹ گرلز پرائمری سکول غلام آباد میں اپنے فرائض مضبی سرانجام دے رہی ہوں۔

جنابہ انکوائری آفیسر شمینہ مشاق کی کمل انکوائری ۔ پورٹس جوانہوں نے میری غیر موجودگی میں بذریعہ آفس کی لیٹر نمبر 165 مورخہ 20.10.2015 ساکلہ کے خلاف کوئی انکوائری نہیں ہے ، اس انکوائری رپورٹس کی مکمل فوٹو کا پیاں عنایت فرمائی جائیں۔

سائلہ آپ سے التماس کرتی ہے کہ مجھے چیک لسٹ 2016، سالانہ معائنہ 2016 گورنمنٹ پرائمری سکول اعوان موہڑ ہ اور ساتھ ہی لاگ بک 2016 اعوان موہڑ ہ اور گوشوارہ 2016 گورنمنٹ گرلز پرائمری سکول اعوان موہڑ ہ عنایت فرمائی جاویل۔ اس سے پہلے میں 15.12.2015 کو انکوائری رپورٹس شمینہ مشاق کی فوٹو کا پیال حاصل کرنے کیلئے ورخواست گزار بھی ہوں جس کی وصولی بایوسید صاحب نے دی ہے جو کہ تا حال بھے ٹہیں ئی ہیں۔

العارضه نائب معلّمه حيينه شابين PST (BPS-12) گورنمنٹ گرلز پرائم کا سکول غلام آباد

Jed & John

Attested Huseena shaheen

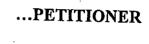
## ANNEX-P

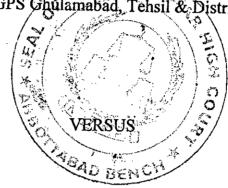
## BEFORE THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH.



W.P No. 1094 -A/2015

Haseena Shaheen, PST GGPS Ghulamabad, Tehsil & District, Haripur.





- 1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. Executive & District Education Officer (F), Haripur.
- 3. Sub-Divisional District Education Officer (F), Haripur.

...RESPONDENTS

No: 477/17

Peshawai In Sourt
Abbottanad Bernah
Authorized Under Secals Acts Ordens

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973, AS AMENDED UPTO DATE WITH ARTICLE 3, 11, 9 AND 29 FOR DECLARATION TO THE EFFECT THAT ACT AND ACTION OF THE RESPONDENTS REGARDING NON-PAYMENT, STOPPING THE SALARY OF THE PETITIONER



## BEFORE THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

W.P No. 1094 -A/2015

Haseena Shaheen, PST GGPS Ghulamabad, Tehsil & District, Haripur.

...PETITIONER

#### **VERSUS**

- 1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. Executive & District Education Officer (F), Haripur.
- 3. Sub-Divisional District Education Officer (F), Haripur.

... RESPONDENTS

NO: 4727

Certified to be True Copy

Peshawar Court

Abbottabao Bench Olymphorized Under Sec 215 Acts Ordris

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973, AS AMENDED UPTO DATE WITH ARTICLE 3, 11, 9 AND 29 FOR DECLARATION TO THE EFFECT THAT ACT AND ACTION OF THE RESPONDENTS REGARDING NON-PAYMENT, STOPPING THE SALARY OF THE PETITIONER



FOR THE MONTHS OF JUNE, JULY & OCTOBER, 2015 WAS CONTRARY TO PRINCIPLE OF POLICE LAW AND FUNDAMENTAL RIGHTS OF THE PETITIONER.

PRAYER; ON ACCEPTANCE OF INSTANT WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE ORDER/ DIRECTED TO RELEASE THE SALARY OF THE PETITIONER IMMEDIATELY FURTHERMORE RESPONDENTS MAY ALSO KINDLY BE DIRECTED TO ADJUST THE PETITIONER ON REGULAR BASIS. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM FIT AND APPROPRIATE MAY ALSO BE AWARDED PLEASE IN THE INTEREST OF JUSTICE.

Respectfully Sheweth: -

1.

Brief facts giving rise to the instant writ petition are as under;-

That the petitioner is rendering her services in Education Department as a PST Teacher for last 27 years.



FOR THE MONTHS OF JUNE, JULY & OCTOBER, 2015 WAS CONTRARY TO PRINCIPLE OF POLICE LAW AND FUNDAMENTAL RIGHTS OF THE PETITIONER.

PRAYER: ON ACCEPTANCE OF INSTANT WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE ORDER/ DIRECTED TO RELEASE THE SALARY OF THE PETITIONER IMMEDIATELY FURTHERMORE RESPONDENTS MAY ALSO KINDLY BE DIRECTED TO ADJUST THE PETITIONER ON REGULAR BASIS. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM FIT AND APPROPRIATE MAY ALSO BE AWARDED PLEASE IN THE INTEREST OF JUSTICE.

Respectfully Sheweth: -

Brief facts giving rise to the instant writ petition are as under;-

1. That the petitioner is rendering her services in Education Department as a PST Teacher for last 27 years.

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About an ad Bench

Authorized Under Seca75 Acts Ordin



# PESHAWAR HIGH COURT ABBOTTABAD BENCH. FORM "A" FORM OF ORDER SHEET

	Serial No of order or proceeding	Date of Order or Proceeding	ORDER OF THE COURT WITH SIGNATURE (s) OF HON'BLE JUDGE (s)
	1	2	3
		28.03.2016	WP No.1094-A/2015  Present: Petitioner with M/S Abdul Aziz Khan Tanoli,
			and Noumanullah Malik, Advocates, for the petitioner.
	PESH	ONIGN	Mr. Muhammad Naeem Abbasi, AAG, for the respondents.
		10 12	***
103		300	QALANDAR ALI KHAN, J: At the outset, it was
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		\$	pointed out to the petitioner and her learned counsel that
,	PARADI	ENCH	the services of the petitioner having been dispensed with
	PAD		and the major penalty of compulsory retirement from
		<u></u>	service imposed upon the petitioner vide Notification of
			the competent authority i.e. District Education Officer
			(Female) Haripur, dated 19.01.2016, a new situation has
			emerged accruing a fresh cause of action to the petitioner.
			to challenge the Notification, but before the competent
			forum i.e. Khyber Pakhtunkhwa Service Tribunal, as not
:			only matters pertaining to disciplinary proceedings against
C	ervilled to be	True Copy	a civil servant but also other matter pertaining to the terms
,	Bed Long		and conditions of a civil servant fall within the jurisdiction
ef.	Abbottabad Suthorized Under Seca	te och 15 Acts Ordris	of the Khyber Pakhtunkhwa Service Tribunal under
			Article 212 of the Constitution of the Islamic Republic of

Pakistan, which bars the jurisdiction of other Courts including the High Court.

- 2. When the aforementioned legal position was explained to the petitioner and learned counsel for the petitioner, the petitioner and her counsel requested for a direction to the Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar, to whom departmental appeal has been preferred on 17.02.2016, to decide the departmental appeal at the earliest, enabling the petitioner to seek remedy available to her under the law in appropriate forum.
- of in the terms that the departmental appeal pending decision with the Director, Elementary and Secondary Education, Peshawar, be adjudicated upon at the earliest but in no case beyond the period prescribed by the law for the purpose, where-after, the petitioner, if still aggrieved of the final order of the departmental appellate authority may have recourse to the remedy available to her under the law.

Announced. Dt.28.03.2016.

Pestawar with Cobra Abbuttabad Bench Authorized winder Seca75 Acts Ordinal

\*/MSA/\*

## ANNEX-B

## بخدمت جناب ڈائر یکٹرصاحب محکمة علیم ایلیمنٹری اینڈسکینڈری ایجو کیشن، پیثاور دی گ

محکمانہ اپیل برخلاف آفس آرڈرنمبر 54-446مور نہ 19/01/2016 جس کے تعت بغیر کسی انگوائری کے یا بیلانٹ کوسننے کے Personal Hearing یادیگر قانونی ضروری تقاضے پورے کرنے کے اور بغیرا بیلانٹ کی 27 سالہ سروس کو مدِ نظرر کھنے کے غیر قانونی طور پر ملی بھگت سے اور ذاتی عناد کی بناء پر اپیلانٹ کو میجر Punishment دیتے ہوئے جری ریٹائر منٹ کا آرڈرکیا جو غلط ، خلاف وانون ، خلاف انساف ، خلاف واقعات ہوئے کے ساتھ نا قابلِ بحالی اور قابلِ منسوخی ہے۔

## جناب عالی! محکماندا پیل ذیل عرض ہے۔

یه که اپیلانٹ محکم تعلیم میں بطور PST ٹیچر گورنمنٹ گرلز پرائمری سکول غلام آباد میں اپنے فرائض بااحسن سرانجام دے رہی تھی اور بوقت Impugned آرڈ راپیلانٹ کی محکمہ ہڈامیں 27 سال سروس مکمل ہوچکی تھی۔

Attested HUSeenashaheen

یہ کہ اپیلانٹ کوبذر بعد آرڈر نمبر 93-2088 مور خد 08/11/2012 کے تحت گور نمنٹ گرلز پرائمری سکول کا کاسے گور نمنٹ گرلز پرائمری سکول اعوان موہڑ ہڑانسفر کیا گیا اور بعداز ال بذر بعد آرڈر نمبر 84-879 مور خد 07/11/2013 کو اپیلانٹ کو چھور شریف میں عارضی بذر بعد آرڈر نمبر Adjust کرنے کا آرڈر کیا گیا جہاں پر اپیلانٹ اپنے فرائض منصبی سرانجام دیتی رہی۔ آرڈر

س۔ یہ کہ ہیڈٹیچر گورنمنٹ گرلز پرائمری سکول غلام آباد نے بذر بعددرخواست + ڈسٹر کٹ ایجو کیشن

آفیسر (زنانه) ہری پورکواستدعا کی کہ میرے سکول میں بچیوں کی تعداد زیادہ ہے لہذا مجھے ایک مزید میچردی جائے۔درخواست لف ہے۔

یه که بید میچر گورنمنٹ گرلز برائمری سکول غلام آباد کی درخواست برا بیلانث کو گورنمنٹ گرلز یرائری سکول غلام آباد میں بھکم ADO سرکل مس شائستہ ایڈ جسٹ کیا گیا جس پراپیلانٹ نے آیی پوسٹ کا حارج لیا اور وہاں سے تنخواہ وصول کرتی رہی اوراس بات کوائکوائری آفیسر نے اپنی ر پورٹ جوانکوائری اپیلانٹ کی درخواست پر برخلاف عزرہ آفریدی کی گئی میں شلیم کیا کہ ا پیلانٹ بحکم ADO سرکل شائسة غلام آباد سکول میں ڈیوٹی سرانجام دے رہی ہے۔ نقل چارج ر پورٹ لف ہے۔

یہ کہا پیلانٹ نے ماہ اگست میں سب ڈویژنل ڈسٹر کٹ ایجو کیشن آفیسر کوایک درخواست دی کہ میں با قاعد گی ہے اپنی ڈیوٹی گورنمنٹ گرلز پرائمری سکول غلام آباد میں سرانجام دے رہی ہوں مع با علاه علی اورمیری تخواه نامعلوم وجوبات کی بناء پر بندکردی گئی ہے جس پراپیلانٹ کی تخواه گورنمنٹ گرلز یرائمری سکول غلام آباد میں واگز ارکی گئی نقول درخواست ادائیگی تنخواه وآرڈ رادائیگی تنخواه لف ہے۔

Attested

يه كه بعدازان مورخه 10/08/2015 كوابيلانث كوشوكازنونس جاري كيا كياجس مين به الزام لكايا كيا كهمورخه 08/11/2012 كوتمهارى ٹرانسفر گورنمنٹ گرلز برائمرى سكول اعوان موہڑہ میں کی گئی اورتم غلام آباد میں ڈیوٹی سرانجام دے رہی ہے دوسراالزام یہ لگایا گیا کہ 01/09/2014 24/09/2014 2016 2016 2016 2016 2016 05/02/2015 16 دن غیر حاضر ہوجس کا اپیلانٹ نے تفصیلی جواب معدر یکار ڈ دیا کہ ا پیلانٹ کواعوان موہڑہ میں ٹرانسفر کرنے کے بعد بذریعہ آرڈر 80-879 مورخہ 07/04/2013 چپورشریف میں عارضی طور پر Till furtehr order ایڈ جسٹ کیا گیا اور بعدازال گورنمنٹ گرلز پرائمری سکول غلام آباد کی ہیڈٹیچر کی درخواست پرمور خه 06/02/2015 كوغلام آباديس ايدجست كيا كيا-جهال يرابيلانث في حارج ليااورسكول ندکورہ کے حاضری رجٹر میں اپیلانٹ کی حاضری موجود ہے۔مزید برآ سے ADO سرکل نے سالا نہ معائنے سکول مٰرکور کیا جس کالاگ بک میں اپیلانٹ کا نام موجود ہے اور جہاں تک

سوال غیر حاضری کا ہے تو اپیلانٹ نے غیر حاضری نہ کی بلکہ اپنی چھٹی کی درخواست معہ میڈیکل سٹوفیکیٹ ارسال کیے۔ اور بمطابق قانون اگر ریتصور بھی کیا جائے کہ اپیلانٹ کی غیر حاضری ہے تو غیر حاضری کا عرصہ ٹوٹل 40 دن بنتا ہے تو اپیلانٹ کی 72 سال سروس ہے جو اپیلانٹ کی چھٹی کی درخواسیس دی جو چھٹی میں Adjust کیا جاسکتا ہے۔ اور پھر اپیلانٹ نے میڈیکل چھٹی کی درخواسیس دی جو کسی صورت میں بمطابق قانون قابل ردنہ ہے اگر کسی بھی صورت میں اپیلانٹ کی چھٹی کوشلیم میں کیا جائے تو 40 دن کی غیر حاضری کا عرصہ بغیر شخواہ تصور کیا جاسکتا تھا۔

9- یہ کہ ڈسٹر کٹ ایجو کیشن آفیسر زنانہ ہری پورنے بجائے اپیلانٹ کامسکام لرنے کے انتہائی عبات میں بغیر کوئی قانونی تقاضے پورے کیے، بغیر کسی انکوائری کیے یا اپیلانٹ کو سننے کے ذاتی عناد اور ملی بھگت سے بغیرا پیلانٹ کی 27سالہ سروس کومدِنظر رکھنے کے یک جنبش قلم اپیلانٹ کو نوکری سے جبری ریٹائر کرنے کا آرڈر بذر بعد آرڈر نمبر 54-446 مورخہ 19/01/2016 تحت خیبر پختونخواہ گورنمنٹ سرونٹ سول سرونٹ ایکٹ 2011صادر فرمادیا۔ نقول آرڈر لف ہے۔

ا۔ یہ کہ مذکورہ Impugned آرڈ رمیں ڈسٹر کٹ ایجو کیشن آفیسر نے یہ مئوقف اختیار کیا کہ

 اپیلانٹ کو جوشو کا زنوٹس جاری کیے گئے ان میں اپیلانٹ کو ڈیوٹی پر حاضری کے لئے کہا گیا جبکہ

ابیا کوئی شوکا زنوٹس اپیلانٹ کو حاری نہ کیا گیا جس میں اپیلانٹ کوڈیوٹی پر حاضری کے لئے کہا گیا ہوبلکہ جوشو کا زنوٹس جاری کیے گئے اُن میں اپیلانٹ کوشو کا زنوٹس کا جواب دینے کے لئے کہا گیاہےاورا پیلانٹ نے نفصیلی جواب معدنقول ریکارڈ کے دیااورا پیلانٹ کےمعقول جواب وریکارڈ کی روشنی میں اپیلانٹ برلگائے گئے الزامات غلط اور بے بنیاد ہیں۔

بیکه بیلانٹ کوأس کی سروس سے جبری ریٹائز منٹ کا آرڈرڈسٹرکٹ ایجو کیشن آفیسر (زنانہ) کی طرف سے جاری کردہ Impugned order بذات خودطًا ہر کرتا ہے کہ آرڈر ندکور غلط اورخلاف قانون ہےاور قانونی تقاضوں کو یا مال کرتے ہوئے کہا گیا کہا بیلانٹ نے شوکاز نوٹس کا جواب دفتر میں بھی کر وایا اور بذریعہ ڈاک بھی ارسال کیا جن کی رسیدات موجود ہیں تو الیی صورت میں اپیلانٹ کے خلاف کی طرفہ کاروائی کرناانصاف کے فطری اصولوں کے خلاف العصام الم الم الم الم الم الم الم يكطرفه كاروائي كرنامقصودهي تو قانون كي روشي مين دوقو مي اخبار مين اشتهار جاري كروا کر کی جاسکتی تھی اور جہاں تک یکطرفہ کاروائی کے بارے میں کہا گیاہے کون سی شہادت ہے جس کی بناء پرالزام اپیلانٹ کےخلاف ثابت ہوئے کسی ایک شہادت کا پربھی نہ تو ڈسٹر کٹ ایجوکیشن آفیسر نے حوالہ دیا کہ سشہادت کی بناء پرالزام برخلاف اپیلانٹ ثابت ہے نیز ا پیلانٹ نے ڈسٹرکٹ ایج کیشن آفیسرزنانہ کودرخواست دی کماگرا پیلانٹ کے خلاف کوئی انکوائری کی گئی ہے تو اُس کی کا بی اپیلانٹ کودی جائے کیکن اپیلانٹ کوائس کی کا بی بھی نہ دی گئی۔

Attested

بحالات بالا استدعا ہے کہ بمنظوری اپل مذا آرڈرعنوان اپل برخلاف اپیلانٹ منسوخ فرمایا جاوے اور اپیلانٹ کوأس کی سروس پرمعہ جملہ فوائد ملازمت کے (Back Benefits) نوکری پر بحال کرنے کا آرڈ رصا درفر مایا جاوے۔

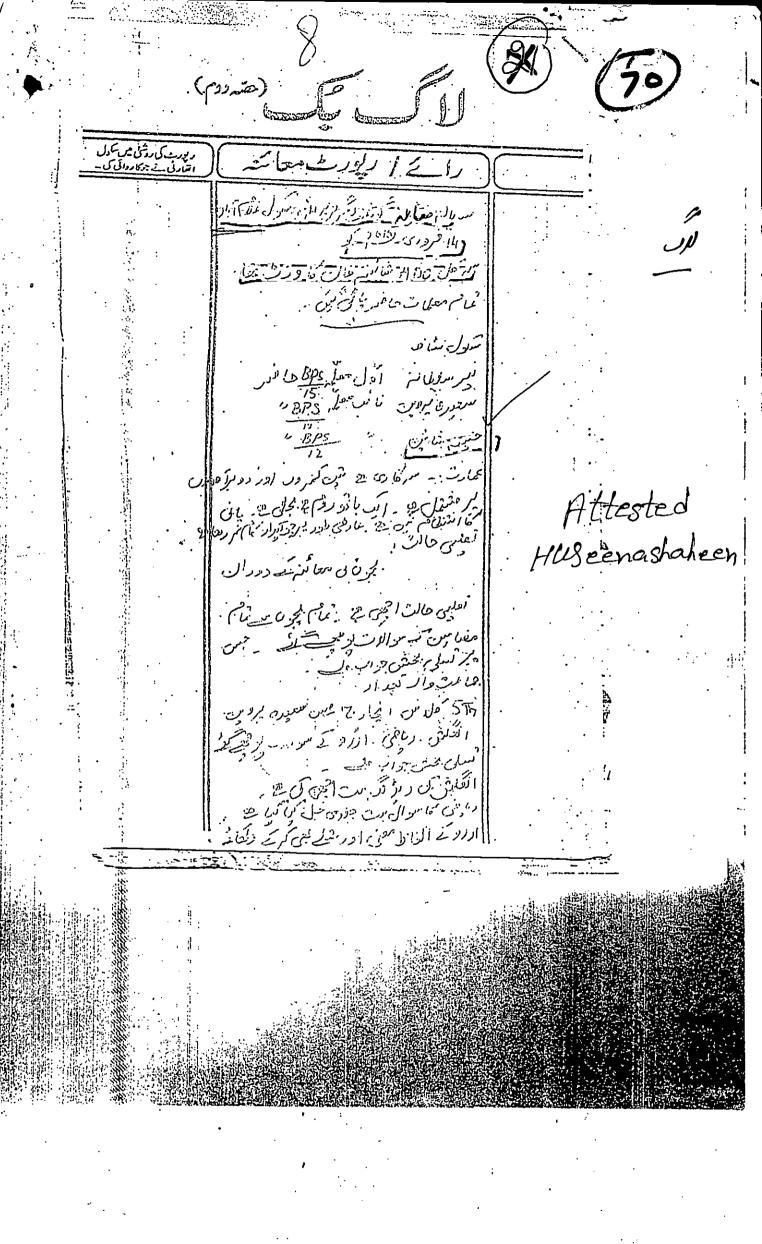
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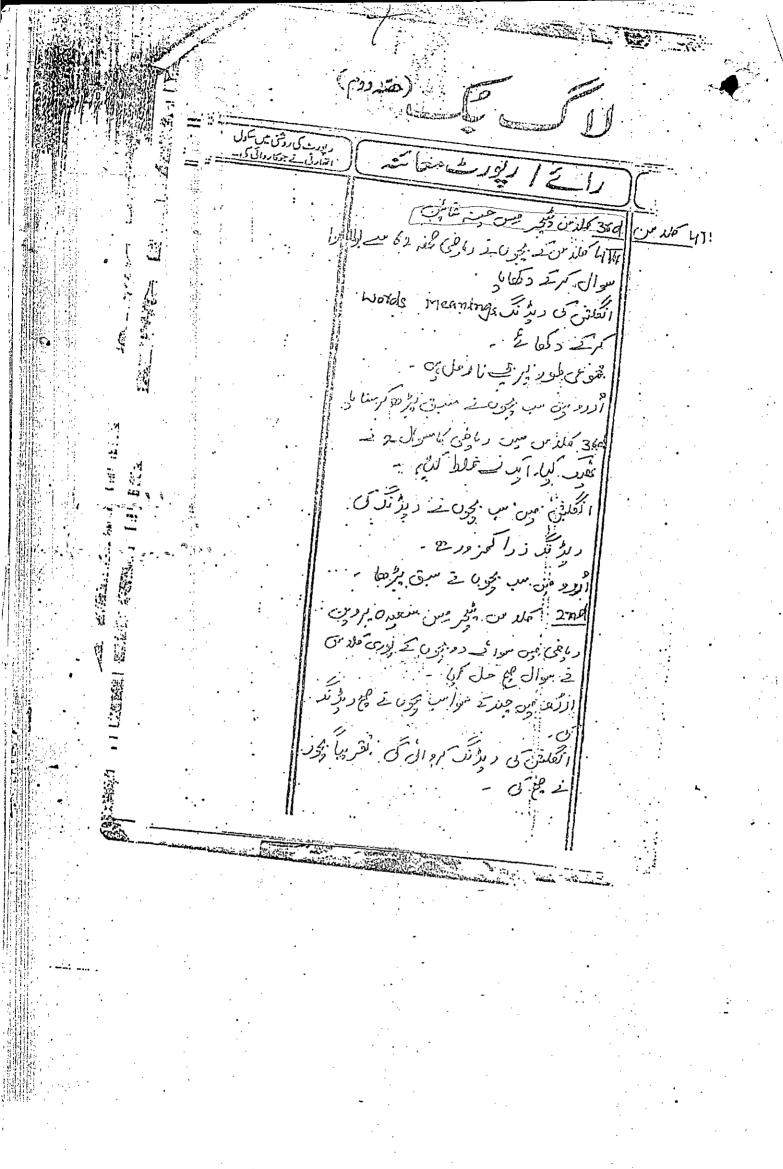
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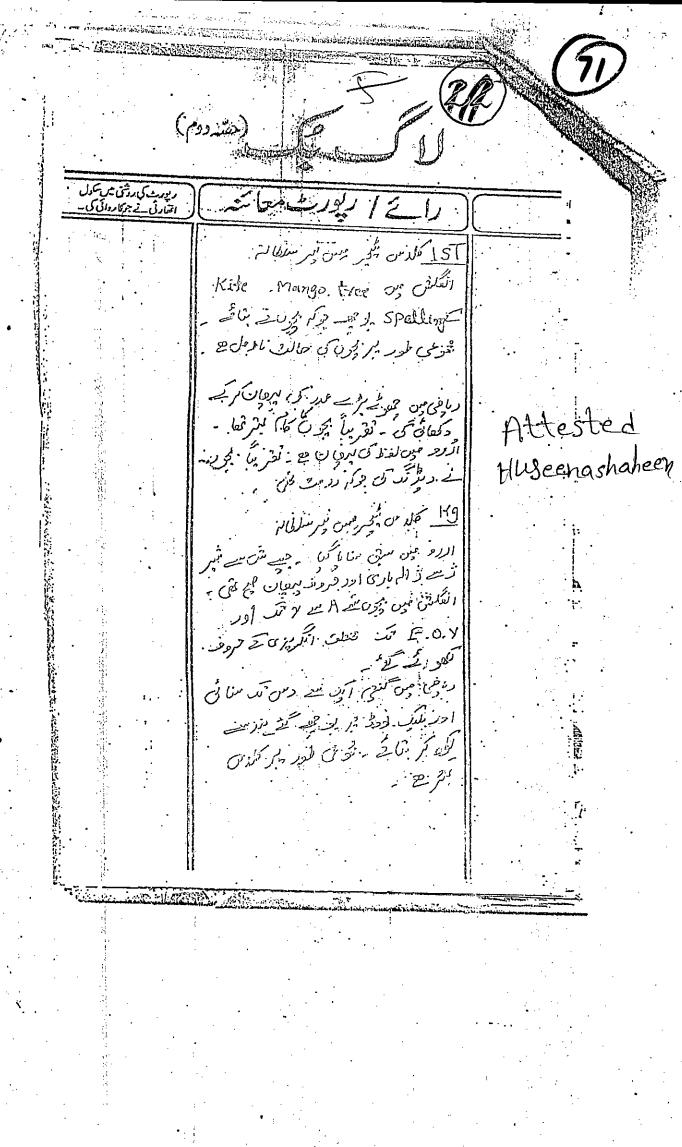
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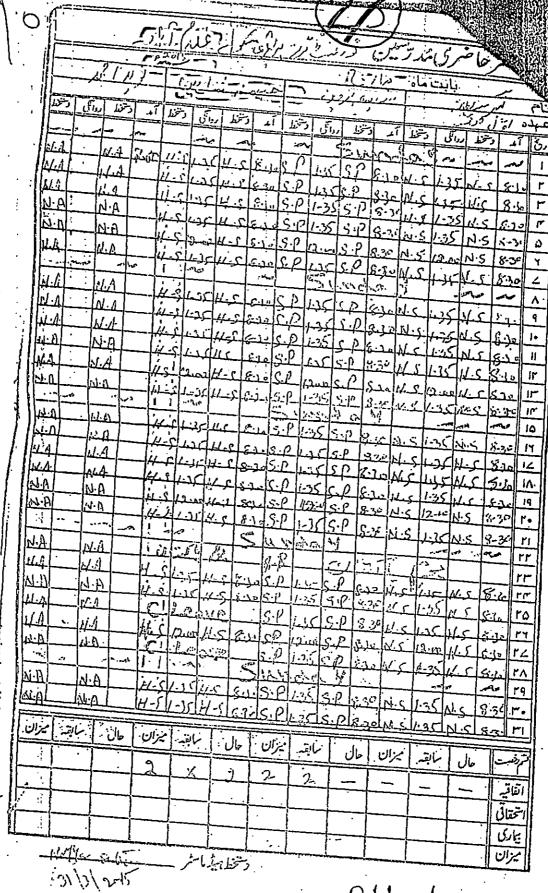
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ن لايد لاستة رالايرية الديدة المعدب المعدب المراد المرد حد المعتفي المديد المعتمدة المعادية المايا - المناهد ب له حديد كله مد الينوا دي روي الا الأعلى المري الماري كم يم الماري كم يم المداري المرابع المدارة الم برأمل عدر يا منور ألى عرد دواسة الأولان إلى ألى أله فيدا برايد المرايد ، الذات بعير، العمد المتعاليم عن المنازك المساحة المعنى بدان نام الأورجي الإلام المالية المرام المنادية خدركان،، اخدى يورى اخرى يورى كالمركم المراجد الدار الأناد المحديدة الأفادة الأخرا تيديمة المخارج المراج المريخ فران ألمران المرافع المجان المحافي المحادث المرافع المحادث المحاد بالمعراية المخدية المارك بالمتاهدة المرتادة المحركة كذكرلوا المائع كالماسفه وللجاء للالالالماء تتيني ماستان المربع بذحة إلاآك تاداك لارفي المرفي المرفي العرك لاربي والمستعداً - في من الإلى المناه ليانا ندر ليور تان بيك لان يور و الجدال في الدي المراد المرد والمديد و المراد المرد والمرد و المرد و سايدة كالوكر لاالعمرب له يالي من الخديد مدر منة در بي الحديد بالالكوال المنار المنه له المالية رد الداري المركول المدارك المعالم المعارية المرادي المنادية المعادية المعادية المعادية المعاديدة على يا ين دري الله المعالم المعادي المعادي المعادي المعادية المعادية المعادية المعادية المعادية المعادية المعادية التداد بواج والمرابع والمرابع المعالم المحالا بمالمنه براز لا كم يهوأ ANT TATINA

xie: 8/9/91020

نايمن جسيد الجدادي الااكر الايراد المعرائ الغدك نعيب المبياله الدلا الدارا

Miller Jewin Shaller

بيش عيس الياهر ل محرق الماج ليان سادات

Months of the Mo

## BEFORE THE SERVICE TRIBUNAL PESHAWAR KPK

8/a 6/5/16

SERVICE APPEAL NO 615/2016

Haseena Shaheen PST GGPS Ghulam AabadThsil& District Haripur C/o Rajput NeelamGhar Near Silk Way Palza G.T Road Haripur

(Appellant )

#### **VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary E&SE Department,
Peshawar.etc (Respondents)

## **INDEX**

S.No	Description of Documents	Annex	Pages
1	Para wise Reply / Comments		1-4
2.	Affidavit		5
3	Copy of Inquiry Report	A	
4	Copy of Notification No 3664-67 dated 24-07-2014.	В	
5	Charge Sheet ,Statement Allegation ,Show Cause Letters	C&D	
6	Copy of Application	E	
7	Receipt	F	
8			

Through

Respondents

BEFORE THE SERVICE TRIBUNAL PESHAWAR KPK

126

SERVICE APPEAL NO 615/2016

Haseena Shaheen PST GGPS Ghulam AabadThsil& District Haripur C/o Rajput NeelamGhar Near Silk Way Palza G.T Road Haripur

(Appellant)

#### **VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary E&SE Department,
Peshawar.etc (Respondents)

Respectfully Sheweth:-

Reply / Comments for & on behalf of respondent No: 1,2,

## **Preliminary Objections**

## Respectfully Sheweth:-

- 1. That the appellant has no cause of action.
- That the appellant has not come to this Honorable Tribunal with clean hands.
   Hence the appellant is not entitled for any relief and appeal and is liable to be dismissed.
- 3. That the appellant has got no locus standi to file the instant Appeal.
- 4. That appellant has concealed the material facts from this honorable Tribunal, hence liable to be dismissed.
- 5. That the appellant has filed the instant appeal on malafide motives.
- 6. That the appellant has filed the instant appeal just to pressurize the respondents.
- 7. That the appeal is barred by law and time
- 8. That the instant service appeal is against the prevailing law and rules.
- 9. That the appellant has been treated as per law ,rules and policy.
- 10. That the appeal is not maintainable in its present form.
- 11. That the instant appeal is bad for misjoinder and non joinder of the necessary parties Hence liable to be dismissed.
- 12. That the impugned notification 446-54dated 19-01-2016 issued by the authority after fulfillment of all legal formalities hence appeal is liable to be dismissed without further proceeding.

Reply /Comments on facts.

128

- 1. Para 1 pertains to the service record of the appellant while it is denied that the appellant rendered her services honestly and diligently to the utmost satisfaction of her superiors. Complaint of absence was registered against her by IMU. A proper enquiry was held and she was compulsorily retired as a result of that lawful enquiry hence the whole Para is denied. (Copy of enquiry report is attached as annexure A)
- 2. Correct to the extent that she was adjusted in GGPS Awan Mohra and then she was temporarily adjusted in GGPS Chohar Shareef.
- 3. Incorrect and not admitted. Appellant was absent in GGPS CHOHAR SHAREEF for 24 days, from 1-09-2014 to 24-09-2014 without sanction of leave and proper procedure. Moreover detailment and temporary adjustment were canceled vide Notification No.3664-67 dated 24-07-2014. She was informed and relived from her duties in GGPS Chohar Shareef. She took charge in GGPS AWAN Mohara her original posted school and was absent from 21-01-2015 from school without any sanction of leave. Statement of this Para is also without any legal proof, baseless and against the facts and records. (Copy of Notification No.3664-67 dated 24-07-2014.)
- 4. Incorrect and-not admitted .The appellant was willfully absent from GGPS AWAN MOHRA and no other order of transfer/ adjustment /temporary order was issued by the competent authority. Thus she was liable to perform her duties at GGPS AWAN MOHRA but she did not attend any school, which clearly shows that appellant remained absent from her duty. All documents of appellant are faked and self-made.
- 5. Incorrect and not admitted. Competent authority did not issue any transfer /adjustment order regarding her performance of duties in GGPS GHULAMABAD, hence the whole para is denied.
- 6. Incorrect and not admitted the statement of appellant and this Para of plaint is misleading the fact.
- 7. Incorrect and not admitted she was directed to perform her duties in GGPS AWAN MOHRA but she took charge and willfully absent from her duties.
- 8. Incorrect and not admitted the appellant was willfully absent from her duties from 21-01-2015 till the completion of enquiry report and she was asked again and again but she did not appear, and was compulsorily retired from service as a result of fair legal and lawful inquiry by competent authorities due to her willful continuous absence from duty, in accordance with the law rules/policy.(Complete inquiry report ,Charge sheet, Statement of allegation and show cause notice along letter of personal hearing are attached as annexure A, B, C & D). Moreover all the required

official procedure regarding the disciplinary action was observed properly well in time.

- 9. Correct to the extent that the salary of appellant was released on her request and on application she wrote her school name GGPS Ghulamabad. Remaining para is denied. (Copy of the Application is annexure E)
- 10.Incorrect and not admitted she was mostly absent in school and regularly show cause notices were served upon her but she did not appear for personal hearing and still was absent in her school. Remaining para is denied.
- 11.Incorrect and not admitted she was relived from GGPS Chohar Shareef and took charge in GGPS Awan Mohra and did not perform duties after taking over charge. The log book provided by Appellant is showing the performance of GGPS Chohar Shareef not of the GGPS Ghulam Abad.
- 12.Incorrect and not admitted the action of the department is legal lawful and according to the rules moreover neither discriminatory nor arbitrary.
- 13. Correct to the extent that show cause notices were from the competent authority.
- 14. Correct to the extent that the salary was stopped due to her continuous absence from her duties.
- 15.Incorrect and not admitted she refused to come before any inquiry committee and competent authority to avail the opportunity of personal hearing.
- 16. Incorrect and not admitted. Respondents acted as per rules and laws.
- 17. Incorrect and not admitted. She was provided all the relevant record .
- 18. Incorrect and not admitted detail reply is already given in para 8.
- 19. Correct to the extent of W.P and judgment.
- 20.Incorrect. However there is no concept of second departmental appeal under law.
- 21. Para 21 is subject to record.

## Grounds.

- A. The action of the department is legal lawful and according to the rules moreover neither discriminatory nor arbitrary. While the present appeal is based on malafide hence liable to be dismissed.
- B. Incorrect and not admitted the appellant was given number of time good opportunities of personal hearing but she never appear the whole enquiry proceeding was conducted in accordance with laws and material facts and records. (Show cause letter and letters for personal hearing attached as Annexure D)

- C. Incorrect and not admitted no transfer and adjustment order of appellant was issued by competent authority to perform duties in GGPS Ghulam Abad. She had no choice to choose a school for duties and she was absent from her school throughout the proceedings which show her fraudulent attitude.
- D. Incorrect and not admitted all the actions of the department against appellant is lawful and justified as she was absent without sanction of eave and proper information. As detail reply is given in PARA 8 & 11.
- E. Incorrect and not admitted the fair opportunities of personal hearing were given to her but she did not appear.
- F. Incorrect and not admitted the action of the department was not arbitrary and discriminatory hence whole para is denied.
- G. Incorrect and not admitted. Proper charge sheet & statement of allegation issued to her.
- H. Incorrect and not admitted all the allegations against the appellant were proved through lawful enquiry while, it is denied that the appellant rendered her service honestly and diligently to the utmost satisfaction of her superior Hence whole para is denied.
- I. Incorrect and not admitted all record was provided to her as the **Receipt of inquiry report is annexure.(F)**
- J. Incorrect and not admitted all the allegations against the appellant were proved through lawful enquiry. Hence whole para is denied. Without any transfer/adjustment order of competent authority, she was not liable to perform her duties according to her own choice and will hence, whole para is denied.
- K. Incorrect and not admitted.
- L. This para is legal .More ever the respondents seek the permission of the Honorable court to present more grounds and proofs at the time of hearing.

#### Prayer:

In the view of the above submission it is requested that this Honorable Tribunal may graciously be pleased to dismiss the petition of petitioner with cost please.

#### Respondents.

- 1. The Director Elementary & Secondary Education Peshawar Respondent No: 2
- 2. District Education Officer(F)Haripur

## CE OF THE PRINCIPAL GOVT: GIRLS HIGH SCHOOL SARAI SALEH H.PUR.

165 /Inquiry / File.

Dated S/Saleh the 20/10/2015

Γo.

The District Education Officer, (Female) District Haripur.

Subject: - Memo,

Inquiry against Mst Haseena Shaheen PST Awan Mohra.

With reference your letter No. 9332/DEO (F)/Haripur/Estb;Pry/Discp Act Dated Haripur the 05-10-2015 subject cited above.

#### Allegation:-

#### 1. Willful Absente.

Haseena Shaheen was posted at GGPS Awan Mohara, She has been willfully absent from her duties GGPS Awan Mohra 21.01.2015.

- 2. She is continuously defying orders of the department by not complying with the order of her posting at GGPS Awan Mohra and Joins any other school wherever she wants.
- 3. She is guilty of violation of section 10, 15 of the civil servants Act 1973 and rules 22 and 34 of Govt Servants conduct Rules 1987.

#### Proceeding:-

A call letter for attendance to the enquiry committee on 13.10.2015 was served the alleged teacher Mst Hasseena Shaheen PST through ASDEO (F) Circle concerned, Similarly ASDEO (F) Circle concerned and SDEO (F) were called for the said fixed date for enquiry I.e. 13.10.2015.

#### Findings:-

The alleged teacher Mst Haseena Shaheen of GGPS Awan Mohra neither appeased in front of enquiry committee on the fixed date nor informed for her non attendance, but remained absent on the day. (Annex-A)

A questionnaire ( in written ) was served to SDEO (F) Haripur, A separate questionnaire ( in written ) was served to ASDEO (F) Haripur Circle concerned.

In response to the questionnaire the SDEO (F) Haripur replied.

- 1 The SDEO (F) Haripur was aware of about the fact that she is posted at GGPS Awan Mohra but she is still working in GGPS Ghulamabad. (Annex-B)
- 2 Alleged teacher is creating problem for herself as time passes.
- 3 According to ASDE (F) after the cancellation of temporary order she went to Ghulamabad instead of GGPS Awan Mohra. (Annex-C)
- 4 She is already undergone the process of enquiry but failed to avail the chance of solving her problem because of her absentee in front of enquiry Officer.

According to ASDO (F) Circle concerned right now she is not working at any school.

## Recommendation:-

After going into the enquiry process and responses of the SDEO (F) Haripur and ASDO (F) Circle concerned the enquiry committee is in view of that while the alleged teacher Mst Haseena Shaheen PST did not appeared in front of enquiry committee which shows her least interest towards the solution her case. It seems that she is guilty as she was given a second time opportunity to explain her stance toward her case but she failed to avail it.

It is therefore recommended that she should be treated under (Efficiency and disciplinary) rule 2011or otherwise as per her case as it may be

Headmustrass

GGHS,Mirpur.

Principal,

GGHS, S.Saleh.

# VFICE OF DISTRICT EDUCATION OFFICER (FEMALE)



## NOTIFICATION:

It is to notify for all concerned that all kind of detailments of PST's (BPS-15/ BPS-14/BPS-12) & Class IV/ Caller are hereby cancelled w.e.f 10-07-2014. If anyone found on detailment during visit / checking strict action will be taken again her /him.

ENDSTT: NO. 3664-67

DATED 24 / 67 /2014.

District Education Officer (Female)

Copy of above is forwarded for information to

- 1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. The Deputy commissioner District Haripur.
- 3. The District Monitoring Officer Haripur.
- 4. The SDEO (F) Haripur/ ASDEO (F) Circle concerned 14174 December to ensure the implementation, in case of non compliance report should be submitted to the under signed for further necessary action.

5. Office file.

District Education Officer (Female)

15-9-2014 2 05,05 Ce (50,05) 16 Bow & Detail Posts

15-9-2014 2 05,05 Ce (50,05) 16 Bow & Detail Posts

Ce (50 Recicule de 15,05) 2019

Passeema Shakean



# OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR

(Office Phone No. 0995-613244-Fax-No. 0995-615140)

## **CHARGE SHEET**

1. I, Naheed Anjum, District Education Officer (F) Haripur, as competent authority, hereby charge you, Mst. Haseena Shaheen PST GGPS Awan Mohra Haripur, as follows:

That you, while posted as PST at GGPS Awan Mohra, committed the following acts/omissions:

- You have been willfully absent from your duties at GGPS Awan Mohra since 21-01-2015.
- ii. You have been continuously defying orders of the department by not complying with the order of your posting at GGPS Awan Mohra and join any school wherever you want.
- iii. You are guilty of the violation of section, 10 and 15 of the Civil Servants Act 1973 and rules, 22 and 34 of Government Servants Conduct Rules, 1987.
- 2. By reason of the above, you appear to be guilty of willful absenteeism and misconduct under rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011, guilty of the violation of section, 10 and 15 of the Civil Servants Act 1973 and rules, 22 and 34 of Government Servants Conduct Rules, 1987 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.
- 3. You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the inquiry committee.
- 4. Your written defence, if any, should reach the inquiry committee within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
- 5. Intimate whether you desire to be heard in person.
- 6. A statement of allegations is enclosed.

COMPETENT AUTHORIT



# OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR

(Office Phone No. 0995-613244 Fax No. 0995-615140)

## **DISCIPLINARY ACTION**

1. I, Naheed Anjum, District Education Officer (F) Haripur, as competent authority, am of the opinion that Mst. Haseena Shaheen PST GGPS Awan Möhra Haripur has rendered herself liable to be proceeded against, as she has committed the following acts/omissions, within the meaning of rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011.

## STATEMENT OF ALLEGATIONS

i. Willful Absenteeism:-

While she was posted at GGPS Awan Mohra, she has been willfully absent from her duties at GGPS Awan Mohra since 21-01-2015.

ii. Guilty of Misconduct:-

She has continuously defying orders of the department by not complying with the order of her posting at GGPS Awan Mohra and joins any school wherever she wants.

iii. Guilty of violation of Khyber Pakhtunkhwa Civil Servants Act 1973 and Government Servants Conduct Rules, 1987:-

She is guilty of the violation of section, 10 and 15 of the civil servants Act 1973 and rules, 22 and 34 of Government Servants Conduct Rules, 1987.

- 2. For the purpose of inquiry against the said accuseds with reference to the above allegations, an inquiry committee consisting of the following, is constituted under rule 10 (1) of the ibid rules:
  - i. Mrs SAmina Mushtaq Principal GGHS Sarae Salah
  - ii. Mrs Farzana Nayyar Headmistress GGHS Mir Pur
- 3. The inquiry committee shall in accordance with the provisions of the ibid rules provide reasonable opportunity of hearing to the accused, record its findings and make, within 15 days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.
- 4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry committee.





## OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) *HARIPUR*

(Office Phone No. 0995-613244 Fax No. 0995-615140)

## SHOW CAUSE NOTICE

I, Naheed Anjum, as competent authority, under the Khyber Pakhtunkhwa Government Servant (Efficiency and Disciplinary ) Rules, 2011, do hereby serve, Mst: Haseena Shaheen PST GGPS Awan Mohra Haripur as follows.

Whereas, as per report of the IMU E&SE Haripur, for the month of April 2015 you had been transferred to GGPS Awan Mohra vide this office order No.2088-93 dated 08/11/2012 . However , you have not complied with the order and are still teaching at GGPS Ghulam Abad without any order .

2. Whereas , an inquiry was conducted against Mst: Azra Afridi ASDEO (F) Circle at your complaint, the inquiry officer has concluded that you remained willfully absent from duty from 01/09/2014 to 24/09/2014, (24 days) and again from

21/01/2015 to 05/02/2015 (16 days) and

3. that as per report of IMU E&SE and ASDEO Circle Pharhala you remained willfully absent from duty from GGPS Awan Mohra and show cause notices issued vide this office Endst: No.6092-93 dated 16/06/2015, 7781-85 dated 10/08/2015, 7838 dated 12/08/2015 and 81466-70 dated 21/08/2015.

4. That an inquiry was conducted against you , the inquiry office has recommended that disciplinary proceeding initiated against you under Khyber Pakhtunkhwa

Efficiency & disciplinary rules 2011.

5. On going through the finding and recommendations of the inquiry officer, material on record and other connected papers,

I am satisfied that you have committed the following acts/ omissions specified in rule 3 of the said rules.

🛕) Guilty of Willful absenteeişm 🕦

b) Guilty of Misconduct 🗸

\*You have ceased to be efficient \( \square\$

1. As a result thereof, I, as competent authority, have tentatively decided to impose upon you "One of the Major or minor penalties" specified in rule 4 of the said rules.

2. You are, therefore, required to, show cause as to why the aforesaid penalty/penalties should not be imposed upon you and also intimate whether

you desire to be heard in person.

3. If no reply to this notice is received within 07 days of its delivery, it shall be presumed that you have no defence to put in and in that case on ex-Parte action shall be taken against you.

> (Naheed Anjum) District Education Officer (Female) Haripur

14247-51

(Competent authority)

Endst; No. \_\_/DEO (F) Haripur/Estab; Pri /Haseena Shaheen Dated Haripur the 4/12/2015 Copy forwarded for information and n/action to the;

1. Director E &Š Education Khyber Pakhtunkhwa Peshawar.

2. Deputy Commissioner Haripur.

3. Senior District Accounts Officer Haripur.

4. District Monitoring Officer E & SE Haripur.

5. Sub Divisional Education Officer (Female)

6. Master File,

District Education Officer (Female) - Haripur

محرور فرسر المساكث المرازمان يريمور واب شوار لولا جن على . مورفان المي من عامرة من طرف سه مورخ و رعيم كاه؟ كورف سوكاز رق كي فو نوط كاني ملى يع جن كا به والمر جواب زير مرمن سع :-فقرہ بنا کے جواب میں عرف ہے ترجی بذرالعد من اور رفرہ کو نہر عرف کو ما میں رخما میری کا بنا و برگزر من من کر بر برایم کی ملکول الوان و رفرہ سرال مرکس کی کیا گی جمال بر میں تے 11 8 تعرفه مل كرور براغرى معكول انوان موروه لعنه حواب بدام وميس مرانا) حنورى وروم ما مر مرد المرد من المعن ارال بزرله أ رور مورفر 11- 12 عاراي الور بر هجور شراف س الرح مسط كرے كا أرفر رسام اور الوان مورم و مرا و معرم الوسط نام العادراج كانورين في أرمز مولعرى مول المولاح مورة من عاه مر الامجر من سے الوال مولاق مولی سرانام دیتی برین وجرم الوال موٹرہ میں ویوقی مرانام . كاموال بي ساد الأمفول يع مى بي بيرسين كورنين في كريز سراعرى كول غلام آبادك ورواست بر فقوی فی بارت بین میکر میں کی تم تر المامی سے 8 تم میں کو مند طر کور در اوری ا حقوعہ سے ی بادب موس معید میں ہی میں سے میں سے یہ معیر سر راب کو رہندے کو بزیراع کا الول چور مشرکت کو رہندے کو تر دراع کا الول الور کی سرافیام دیتی رہنی کو خر ماہم کی دعیر الفت ہے اور و شعرف کو تر دراغ کا الور کا الور کا شعرف کا دراغ کا د

جود فترا و ول مرك اور و الكر لفام برواكيه العرب وافع طر برقر بركار دفتر في كا نامنطوريا كا مست ولا اطلاعات و كالمح وكر مطاق فا ون الراسي كا فعلى منظرس کی جاتی ہے اطاری وی رسان سے اور عمال تک میڈیکل جھڑ کا تعلق سے میڈیکل میڈیکل جھڑ کا تعلق سے میڈیکل تومید نواکی چی برصورت میں فابل منظری ہے تیکن میڈیکل آنے برسے کنڈ prion کو میڈیکل آنے برسے کنڈ میں میں اور اور ا درواستن ع مي تعليب فيعل المنس و الساس و السرك المام حيرو اليرك الملى الرس الما درواسین عدید میر بعد سی اور می اور می سیرو رسید می و بر سید سید است می و بر سید سید می و بر سید سید می و بر سید می و بر می با در می می و بر می در و این در فقره في فاستعاند هوست مرسين تفعيل والسفره عبر فالله وما ع ملك فقره فی باست علقہ مروست برسے مرسے لفعمل واسد فرہ مرسا کے دیا جو دیا ہے کہ اور مرسا کے دیا ہی مفاخیری کی بنا ویر سرا بہا دار انوان کوریہ جو درخیر کے درخی منا کے درخیر کی درخیر ک فلات بوردره - - - - برادر الله على بن مروس مرا با من ما دور كار كالما كالورس من ما دور كار كالما كالورس آ دور کو بوعظه کرون کی فقره منبه کی باید معنف سے کو اگری کو انوازی کی آئی سے لو ده مری فی موجو ملی میں کی کہا جا کا ماست فقره منبه کی باید من منبی میں اور کر اندازی کی آئی ہے اور میں اور کو راہم کر اندازی کا اندازی کا اندازی کا اندازی کا اندازی کا اندازی کی کی کردازی کردازی کردازی کی کردازی کردا فقره من کی با بست معرف می مسلم و کا من انوانری کی انگر او وه من مرحول من کی مناسع میں بات مسلم من مناسع میں بات مناسل من من مناسل انکوائری کی انکوائری کی انکوائری کی انکوائری کی انکوائری کی کا دوائی کرنا و مرکول کی کا دوائی کرنا کو کا کا دوائی کی کا دوائی کی کا دوائی کی کا دوائی کی کا دوائی کا دوائی می کا دوائی کا دوائی کا دوائی کی کا دوائی کا دوائی کا دوائی کی کا دوائی کاروزائی کا دوائی کا ميرى منى الله مر الله الله مر ملاست بالدا تكوائرى مذكور ما فارتعار مرمان جاري أو مرى منى الكراك كالكلات ما درمواغ بالجاري منى المراك ما درمواغ بالجاري من المراك كالكلات ما درمواغ بالجاري من المراك كالكلات ما درمواغ بالجاري كالمده بهر علاقت ما درمواغ بالجاري كالمده بالمرك كالمده بالمرك كالمده بالمرك المده بالمركز والمرك كالمده بالمركز والمركز والم AM (e//

## Office of the District Education Officer Female

Τυ

1. V Mst. Haseena Shaheen PST GGPS Awan Mohra
DO Raja Forgeet Muhammad Mohallah Rojgan Mankatai
Subject: ATTEND DEO (F) OFFICE FOR PERSONAL HEARING
Janipur

Memo,

You are hereby directed to attend the office of undersigned on dated 28-09-2015 at 9:00 AM for personnel hearing.

District Education Officer (F)
Haripur

Endst: No, 9129-34 /

Dated 22/09/2015

Copy to the .-

- 1. Director Elementary & Secondary Education Peshawar.
- 2. Nazim District Government Haripur.
- 3. Deputy Commissioner Haripur.
- 4. District Monitoring Officer (E&SE) Haripur.
- 5. Sub Divisional Education Officer (Female) Haripur.
- 6. Office File .

District Education Officer (F) Haripur



# Office of the District Education Officer Female

Ph: 0995-613244 NO. <u>| 444c</u> Date <u>| 1//2 |</u> 2015

To.

 Mst: Haseena Shaheen GGPS Awan Mohra Haripur

Subject:-

ATTEND DEO (F) OFFICE FOR PERSONAL HEARING

Memo.

You are hereby directed to attend the office of the undersigned on dated 17/12/2015 at 10: 00 A.M for personal hearing.

District Education Officer (F)
Haripur

 Sarely Status in To Hassing Shaheen Ps GSPS Awan Mohra.

- Peny In Active w. of 1-6-2015. As fer report of ADO Circle, she is absent on not taken charge at eggs Awan mohog.
- 2) for Active w. e.f. Aug: Sep: 2015/ she promised that I pergorm had duties regularly,
- 3) fan again in Active weif 1-10-2015 to dist date, she is not present and perform her dules at GFPS A wan mohra. As per sepons of ADO Circle.

Harry.

912/10/1 The Mo

الكول 13 و ا

DBA number BC No. 1 0 - 2 1 4 6 S.No.47837	Head Slerk
Name of Advocate No MAN ULLA 14	District Bar Association Abbottabad
- (   w/ ) v (   w/ ) v (   w/ ) v (   w/ )	) بعدالت _
المراد ال	عنوان: منجانب: _
باعث تحریر آنکہ بالاعنوان میں اپی طرف سے داسطے پیروی وجوابد ہی برائے پیشی یا تصفیہ مقدمہ برقام میں اپنی طرف سے داسطے پیروی وجوابد ہی برائے پیشی یا تصفیہ مقدمہ برقام میں اپنی طرف سے داسطے پیروی وجوابد ہی برائے پیشی یا تصفیہ مقدمہ برقام میں اپنی اسٹی کے لیے	. =
رد مدرد بالا توان آن المروم كليك من المروم كليك الم	
حب ذیل شرا بطر پروکیل مقرر کیا ہے کہ میں ہر پیٹی پرخودیا بذریعہ مختار خاص روبر وعدالت حاضر ہوتار ہوں گا اور برونت پکارے	
نے مقد مہ دکیل صاحب موصوف کوا طلاع دے کر حاضر عدالت کروں گا۔اگر پیشی پرمظہر حاضر نہ ہواا در مقد مہیری غیر حاضری کی وجہ	
کی طور پرمیرے خلاف ہوگیا توصاحب موصوف اس کے کی طور پر ذمہ دارنہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچبری کے	-
اوہ کس جگہ یا بچہری کےاوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گےاور مقدمہ پچہری کےعلاوہ کسی اور جگہ 	
عت ہونے پر ماہر وزنقطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پرمظہر کوکوئی نقصان پنچے تواس کے ذمدداریااس کے داسطے	
ی معاوضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب موصوف ذ مددار نہ ہونگئے ۔ مجھکوکل ساختہ پر داختہ صاحب موصوف میں معاوضہ کے اداکر نے یا مختانہ کے واپس کرنے کے بھی صاحب موصوف ذ مددار نہ ہونگئے ۔ مجھکوکل ساختہ پر داختہ صاحب	
ئل کرد ہ ذات منظور ومتبول ہوگاا درصاحب موصوف کوعرض دعویٰ یا جواب دعویٰ اور درخواست اجرائے ڈگری دنظر ثانی اپیل مگرانی و ہرقتم 	
خواست پردسخط وتصدیق کرنے کا بھی اختیار ہوگا اور کسی تھم یا ڈگری کرانے اور ہرتتم کا روپیہ وصول کرنے اور رسید دینے اور واخل کرنے	
ر ہرشم کے بیان دینے اوراس پر ثالثی وراضی نامہ و فیصلہ برحاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات	
ر کچهری صدرا پیل دبرآ مدگی مقدمه یامنسوخی ڈگری بکطرفه درخواست تھم امتناعی یا قرقی یا گرفتاری قبل از گرفتاری واجرائے ڈگری بھی صاحب محمد کا مصرفتان میں مقدمہ یامنسوخی ڈگری بکطرفه درخواست تھم امتناعی یا قرقی یا گرفتاری قبل از گرفتاری واجرائے ڈ	
وصوف کو بشر طادا نیگی علیجد ہ مخانہ پیروی کا اختیار ہوگا۔اور بصورت ِضرورت صاحبِ عمر صلاح کو یہ بھی اختیار ہوگا کہ مقدمہ نہ کوریاس کے	
نسی جزوکی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کواپنے بجابک یا اچنے ہمراہ مقرر کریں اور آپیلے وکیل کوبھی ہرامر میں	
ہی اور ویسے اختیارات حاصل ہو نگے جیسے صاحب موصوف کو <del>حاصل ہی</del> الدر دوران مقدمہ جو پچھ ہر جانہ التواپڑے گاوہ صاحبِ موصوف	
کاحق ہوگا ۔اگر وکیل صاحبِ موصوف کو بعدی فیس تاریخ <del>گیش ہے کہا</del> ۔انہ کروں گا تو صاحبِ موصوف کو بوراا ختیار ہوگا کہ وہ مقدمہ کاحق ہوگا ۔اگر وکیل صاحبِ موصوف کو بعدی نظیم کا کہ مسلسلہ انہ کروں گا تو صاحبِ موصوف کو بوراا ختیار ہوگا کہ وہ مقدمہ	<b>988</b>
کی پیروی نہ کریں اورا کی صورت م <del>یں بیر اکو تی مطالبہ کی کی</del> کاصاحہ موصوف کے برخلاف نہیں ہوگا۔ ہذاوکالت نامہ ککھ دیا ہے کہ سندر ہے۔	
ضمون وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور مطور ہے۔ روٹ دن کم ماہ کسال	

Huseenashaheen