


Cost of Rs. 3000/- received in Service Appeal No. 389/23

Titled Nazma Ali vs ECy SE. Dptt.

in the office of Assistant Registrar, Vide Order 05/12/23,  
submitted on 16/01/2024.

  
16/01/24  
Assistant Registrar  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal N0 389/2023

Mst Nazma Ali

Vs

Govt. of Khyber Pakhtunkhwa

Written Reply on behalf of Respondents

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Service Appeal N0 389/2023

Mst Nazma Ali

Khyber Pakhtunkhwa  
Service Tribunal

Vs

Diary No. 10572

Govt. of Khyber Pakhtunkhwa

Dated 16-1-2024

Para wise comments on behalf of Respondents 1 to 4  
That the respondents submits as under

Respectfully Sheweth:

Preliminary Objections:

- A. That the Appellant has no locus standi and cause of action to file the instant appeal.
- B. That the present Appeal is wrong, baseless hence not tenable in the eyes of law, and not maintainable, it shows no cause to be taken for adjudication, therefore the same Appeal is liable to be rejected/ dismissed.
- C. That the Appeal is bad for misjoinder and nonjoinder of necessary parties.
- D. That t no legal right of the appellant has been violated, therefore the appellant has no right to file the instant appeal.
- E. That the appeal is wholly incompetent, misconceived & not maintainable in its present form..
- F. The Appellant is completely estopped/precluded by her conduct to file this Appeal.
- G. Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from mis-statements and concealments of facts and as such the Appellant is not entitled to equitable relief.
- H. That the the Hon' able Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.



- I That the appeal is not maintainable under section( 4) of service tribunal Act
- J That the appellant has concealed the material facts from this Hon,ble tribunal he is not come with clean hands.
- K That the Notifications dated 22-11-2017 and 16-06-2022 of the respondent department are within legal sphere and liable to be maintained.
- L That the respondent department implemented the judgment of the Hon,ble tribunal in letter and spirit whereby the appellant has been removed in the light of denove inquiry as per direction by the Hon,ble tribunal.
- M That the appeal is based by law and limitation.

PARA WISE REPLY ON FACTS:

1. Para 1 Incorrect and concocted, while in the light of the judgment of the Hon,ble service Tribunal service appeal No 1504/2018 announced on 11-11-2021 hence the respondent department conducted denove inquiry against the (4) fake teachers including the appellant has removed in the light of the recommendation of the inquiry report.( Copy of notifications 20-01-2022 , 16-06-2022 annexure A)
2. Para 2 incorrect, false and concocted, that the certified teacher (CT) post is a District cadre post according to NWFP (now KPK) Policy posts from BPS 1 to BPS 15 are District cadre post which means must be filled by the candidates having domicile of the respected District where the post is vacant, then how could be she appointed in District Battagram as the Appellant hailing from Charsadda therefore she has hide material facts of the Hon,ble Tribunal, whether the appointment as well as all record pertaining to the service the appellant was found fake and bogus after verification, the DEO (F) Battagram Mst Rehana yasmeeen replied through E-mail and stated, that signature put on subject letter is fake, I did not signed on such type of letter nor dispatch number and regretted to say letter is totally fake and bogus signature (copy of E-mail Annexure B) and 1<sup>st</sup> enquiry annexed with the Appeal on page N0 56 to 60)( moreover detail facts mentioned in the recommendation of the denovo inquiry report.(Inquiry report annexed with the service Appeal on page No 42 to 48)



3. Incorrect, false and concocted hence denied, the answering respondents send verification letter regarding the Appointment order of the Appellant and also initiated enquiry regarding the Appellant, however the verification has found fake and bogus, hence the impugned Appointment order has not been issued from the DEO (F) battagram moreover detail reply has been given in the above para.
4. Incorrect, according to categorically statement of the DEO (F) Battaram that office record regarding the Appointment of the (Appellant) is silent is fake and bogus moreover detail reply has been given in the above preceding para of reply.
5. Para 5 self explanatory of the Appellant, further detail reply has been given in the above para.
6. Para 6 incorrct and concocted the respondent department conducted de novo inquiry to compliance the judgment of the Hon,ble Tribunal and the appellant was removed from service.
7. Para 7 self explanatory needs no reply .
8. Para 8 is Incorrect as the all Notification are the respondent department are legally Competent and the appellant removed from service in the light of denovo inquiry report.

**ON GROUNDS:**

- A. Incorrect the respondents acted accordance with law the Notification dated 19-07-2019 and 16-06-2022 of the respondent department are legally competent which are in accordance with law..
- B. Incorrect and baseless and misleading, the enquiry proceeding, facts finding and recommendation already placed on the record moreover detail reply has been given in the preceding paras of para wise reply.
- C. Incorrect and against the facts the enquiry proceeding, facts finding and recommendation already placed on the record moreover detail reply has been given in the above paras.
- D. Incorrect as replied in para above, the time of verification the appointment order of the appellant found fake and fabricated hence the appellant has no valid ground to rely on.
- E. Reply of this ground as per the preceding paras of para wise reply.


F. That the appointment order of the Appellant declared fake & bogus in the light of enquiry report hence the Appointment order of the Appellant void ab initio.

G. Incorrect, false and concocted, the appointment order of the Appellant declared by DEO (F) concerned and enquiry report fake and fabricated.


H. Incorrect, false and concocted the appellant just mislead the Hon,ble tribunal by self made story.

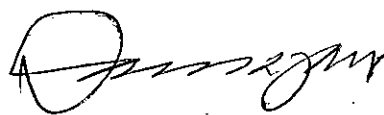
I. That the Hon,ble service tribunal disposed off the Execution petitions in the light of enquiry report and CPLAs also subjudice before the Hon,ble Supreme court of Pakistan vide CPLA No 55.56,57.58-p/2022.

J. That the answering respondent also seek permission of the Hon,ble tribunal to adduce further points at the time of arguments.

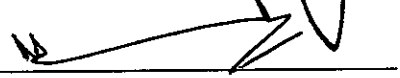
***It is, therefore, most humbly prayed that the appeal of the appellant may be dismissed with cost.***

Respondents:

1; Secretary Elementry & Secondary Education KPK  Masood Ahmad

2 Director E&SE Khyber pakhtoon khwa  Samina Iltaf

4 District Education officer female Charsadda  Rehana Abbasi

5 District Education officer female Battagram  Rehana Abbasi

**Service Appeal N0 389/2023**

**Mst Nazma Ali**

**Vs**

**Govt. of Khyber Pakhtunkhwa**

**Written Reply on behalf of Respondents**

**AFFIDAVIT**

I Mr Mudassir shah ADEO Litigation (BPS 16) of the DEO (F) Charsadda do hereby as per information conveyed to me by DEO (F) Office solemnly affirm and declared that the contents of para wise reply are true and correct to the best of my knowledge and nothing has been intentionally concealed from this Hon'ble Tribunal.

Deponent



Mudassir shah ADEO Litigation  
O/O DEO (FEMALE)  
Charsadda CNIC: 17101 6347249-1

(ANNEXURE A)

**Office of the District Education Officer Female**  
**District Charsadda**

0919220086 emischarsadda.deof@yahoo.com

No. 6720-4 / Dated 20 / 10 / 2022

**Notification**

In the light of the Judgment passed by the Hon,ble Service Tribunal on 11-11-2021 with others (3) club cases, the competent authority is pleased to reinstate the following teachers for the purpose of de novo enquiry only.


S.No.	Name of teacher	School names
1	Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
2	Mst shama begum Ex-PST	GGPS pigham Charsadda
3	Nighat seema Ex AT	GGHS Dadu killi Charsadda
4	Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA

Endst NO 6720-4 dated 20 / 10 / 2022

**Copy for information**

- (1) PA to director E&SE khber pukhtoon khwa
- (2) Mst Nazma Ali Ex-CT GGMS Rajjar Charsadda.
- (3) Mst Shama begum EX-PST GGPS Pigham killi Charsadda.
- (4) Mst Nighat seema EX-AT GGHS Dadu killi Charsadda.
- (5) Mst Zia Gul EX- DM- GGMS dheri Hameed Mian Charsdda.
- (6) office file.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSAKDA





# Office of the District Education Officer Female

## District Charsadda

0919220086 emischarsadda.deof@yahoo.com

No. \_\_\_\_\_ / Dated 16 / 06 2022

### OFFICE ORDER

In Compliance of the Judgment dated 11-11-2021 titled Nazma Ali others (3) club cases passed by the Hon,ble Service tribunal with the consultation and recommendation of the Enquiry committee discussed herein above the undersigned in the capacity of being competent authority and the instant cases of the considered opinion that the following appellants are not entitled to reinstate against the posts in question. Moreover notification been Endst Nos 1508-15 dated 19-07-2019 and Endst No, 10644-46 dated 22-11-2017 of the Ex-DEO (F) Charsadda are hereby maintained in the interest of public service please.

S.No.	Name of teachers	School names
1	Mst Nazma Ali Ex-CT	GGMS Rajjar Charsadda
2	Mst shama begum Ex-PST	GGPS pigham Charsadda
3	Nighat seema Ex AT	GGHS Dadu killi Charsadda
4	Mst Zia Gul Ex-DM	GGMS Dheri Hameed Mian Charsadda

DISTRICT EDUCATION OFFICER  
( FEMALE) CHARSA DDA

Endst NO 12025-30 dated 16 / 06 2022

Copy for information

- (1) PA to director E&SE khber pukhtoon khwa
- (2) Mst Nazma Ali Ex-CT GGMS Rajjar Charsadda.
- (3) Mst Shama begum EX-PST GGPS Pigham killi Charsadda.
- (4) Mst Nighat seema EX-AT: GGHS Dadu killi Charsadda.
- (5) Mst Zia Gul EX- DM- GGMS dheri Hameed Mian Charsadda.
- (6) office file.

  
DISTRICT EDUCATION OFFICER  
( FEMALE) CHARSA DDA

ANNEXURE B

34 ✓

(R)

Rehana Yasmin <deorehanabasi@gmail.com>  
To: DEOFEMALE CHARSAJDA  
May 23 at 7:47 AM  
R/DEO F  
Charsajda

Reference your letter received through e mail for verification  
it is stated that signature put on subject letter is fake .I did not signed on such type of letter nor dispatch  
no. put on letter mach with despatched register of w/o undersigned copy of dispatched register  
attached. Therefore it is regretted to say letter is totaly bogus and fake signature with fake d/no put on  
that.

REHANA YASMIN  
DEO F BATTAGRAM



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.

No. 6754 /F.No,14/(F)/Appeal Charsadda

Dated Peshawar the 24/05 /2019

A.DEO 4182  
29.5.19

To

The District Education Officer,  
(Female) Charsadda

Subject:- INQUIRY REPORT

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiry report carried out by Mst Naheed Anjum Deputy Director (B/TRG) Local Directorate in respect of Mst. Nazma Ali CT Transfer from Battagram to Charsadda and to ask you to implement the recommendations of the enquiry report.

*Hand*  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

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

Copy forwarded your information to the:-

1. PA to Director (E&SE) Khyber Pakhtunkhwa local Directorate.

Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

D No

1807  
03/06/19



(46)

DISTRICT EDUCATION OFFICE FEMALE CHARSAJDA

Contact No.0919220486, Email address, emischarsajda.deof@yahoo.com

No. 20825 / Dated 13 / 11 / 2018

To

Mst: Nazma Ali  
EX-CT  
GGHS Rajjar

Subject: PERSONAL HEARING

Memo:

YOU are hereby directed to attend the office of the undersigned for personal hearing on 14/11/2018 at 9: AM positively, as the Dy: Directress will visit this office for the enquiry of your transfer case.

  
DISTRICT EDUCATION OFFICER  
FEMALE CHARSAJDA

Endst: No. \_\_\_\_\_ / Dated \_\_\_\_\_ / 2018

Copy for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Principal GGHS Rajjar
3. Office File.

DISTRICT EDUCATION OFFICER  
FEMALE CHARSAJDA



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.

No. 6754 /F.No,14/(F)/Appeal Charsadda

Dated Peshawar the 24/05 /2019

ADEO 4182  
29.5.19

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*H. H. H.*  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

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

Copy forwarded your information to the:-

1. PA to Director (E&SE) Khyber Pakhtunkhwa local Directorate.

Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

D No  
1807  
03/06/19

208



Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

2839  
No \_\_\_\_\_ F. No. Inquiry/2019  
Dated Peshawar 13/2/2019

To.

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Subject:- Inquiry Report.

Memo.

P-193

Reference notification No.9749-51 Dated 26-10-2018 wherein the under signed was appointed as Inquiry Officer in r/o Mst. Nazma Ali C.T transfer from District Batagram to district Charsadda.

Please find attached herewith the inquiry report for information and further necessary action.

*[Signature]*  
13/2/19  
Deputy Director (B/TRG)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

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

Copy for information to the.

- 2. PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

Deputy Director (B/TRG)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

1755  
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ADDE.

In inquiry report mentioned in letter  
✓ Spirit.

*[Signature]*  
14/2/19

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14-2-19

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Zahid  
15/2

204

INQUIRY REPORT

REGARDING TO THE TRANSFER OF Mst NAZMA ALI CT  
FROM DISTRICT BATTAGRAM TO DISTRICT CHARSADE

AUTHORITY

DIRECTOR

ELEMENTARY & SECONDARY EDUCATION

KHYBER PAKHTUNKHWA PESHAWAR

INQUIRY OFFICER

NAHEED ANJUM

DEPUTY DIRECTOR E&SE KHYBER PAKHTUNKHWA

# INQUIRY REPORT

## TERMS OF REFERENCE

The Director E&SE Khyber Pakhtunkhwa Peshawar was pleased to nominate the undersigned as an inquiry officer under the Notification Endst No.9749-51/F.NO14/(F) Appeal Charsadda dated Pesh the 26/10/2018(Annexure-I).

## BACKGROUND:

The DEO (F) Charsadda requested the worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa vide Letter No.19585 Dated 5/10/2018 to order an inquiry regarding the transfer of Mst. Nazma Ali CT from Battagram to Charsadda (Annexure-II).

## PROCEDURE:

1. After intimating vide Letter No. 2048 Dated:09/11/18(Annexure-III), the undersigned visited the Office of the District Education Female, Charsadda on 14/11/2018. She perused and collected all the relevant available record. During the visit of DEO(F) office, Mst; Nazma was also present (Annexure-IV). She submitted her written statement on the spot.
2. Letter No. 195 Dated 1/11/18 and Letter No. 2048 Dated 9/11/18(Annexure-V & VI) were sent to the District Education Officer (F) Battagram requesting him to direct the dealing hands to attend the office of the undersigned along with all relevant record. He attended the office however, he provided incomplete record. The DEO(F) Battagram was again requested vide Letter No. 8609 dated 31/1/2019(Annexure-VII) and was telephonically contacted as well but the requisite information was not provided.
3. The Deputy Director (F)Establishment Directorate of E&SE was requested vide Letter No. 193 Dated 01/11/2018 (Annexure-VIII) to verify the transfer order of Mst. Nazma from Battagram to Charsadda. In response, vide Letter No 603/F.No.14/Appeal Charsadda Dated Peshawar the 21/12/2018(Annexure-IX) it was replied that the file had been misplaced during shifting of office and the dispatch/issue register was in the custody of NAB and they did not possess any record pertaining to the transfer in question.
4. The existing dealing assistant of Deputy Director (F) Establishment Directorate of E&SE Mr. Muhammad Zahir was asked vide Letter No. 380 Dated 1/1/2019(Annexure-X) to record statement regarding misplacement of the required file. In reply, he said that the dealing assistant in 2013, was Mr. Munir and that he would be in a better position to response (Annexure-XI). Therefore, Mr. Munir Khan, the then dealing assistant was asked vide No 794 Dated 3/1/19(Annexure-XII). In reply, he stated that he had given the charge to Muhammad Zahir in June 2013 when he was deputed as PA to Minister Elementary and Secondary Education. (Annexure-XIII). So, in those conditions the



Inquiry officer was unable to retrieve any official record or documents despite issuing official letters.

Letter to District Education Officer Male Swat was sent vide No. 5265 Dated 21/11/2018(Annexure-XIV) to direct Mr. Khadim Shah the then Suptt Charsadda now working as Budget and Account Officer in Swat to attend the office of the undersigned as he had personally visited the DEO Office Battagram to verify the documents of Mst. Nazma. Statement of Mr. Khadim Shah was recorded (Annexure-XV).

- Studied the case thoroughly.
- Reported findings accordingly.

#### DETAILS:

#### SUMMARY OF THE STATEMENT OF MST NAZMA

After detailed verbal discussion in the office of District Education Officer, Mst Nazma Ali gave statement in the presence of DEO (F). She stated that she was appointed in GGHS District Battagram vide Endst No5509-14/FB/AE-II/Appointment/2010 dated 1/1/2011(Annexure-XVI) as a CT without any written test. As CT post was not lying in GGHS Banian, therefore, she was adjusted in GGMS Shamlae vide office order No 1385-89 Dated 31/1/2011 (Annexure-XVII). Her husband was posted in office Battagram as a class IV. He belonged to District Charsadda. After four months he was granted for medical leave but she could not provide any record of her medical leave to the undersigned. According to her statement she was transferred to Charsadda vide endorsement No. A-167CT2013 Dated Peshawar the 1/3/2013. She provided charge report in GGMS Shamlai relieving certificate from GGHS Banian, Application for transfer, transfer order, attendance register of GGMS Shamlai, pay slip along with her written statement (Annexure a,b,c,d,e,f,g). Surprisingly pay slip which she provided name of the school is GHS

#### SUMMARY OF THE STATEMENT OF MR. MUHAMMAD JAMIL SUPERINTENDENT BATTAGRAM:

Muhammad Jamil superintendent office of the DEO (F) Battagram visited the office of the undersigned twice on 28/11/2018 and 6/12/2018. He provided incomplete record and only appointment order of 2011(Annexure-XIX), Photocopy of statements of undersigned of GGHS Banian and GGMS Shamlae (upgraded to high school in June 2011) of DEO (F) Battagram attendance register of GGMS Shamlae (Annexure-XX, a, b, c) and the statement that the name of MST Nazma could neither be found in the appointment order nor in the attendance register (Annexure-XXI). A Written statement given by undersigned of GGHS Shamlae saying that, as per the attendance register no teacher on the name of MST Nazma was found". DEO female in his letter also mentioned that the name of Mst. Nazma was not found in any school of Battagram. He provided minutes of DSC meeting in which

Of total 12 vacant posts, 9 posts were recommended/approved to be filled from batch wise list (a) and 3 from open merit, at the ratio of 75% and 25% as per policy that time in vogue. However, 10 candidates were appointed in batch wise quota and 3 from open merit, total 13 appointments were made instead of 12. In the appointment order provided by Mst. Nazma Ali 11 candidates were enlisted. Alarming, the appointment file was incomplete and a transfer file of a period was missing in the office of the DEO Battagram. (Annexure XXII a, b)

iii. SUMMARY OF THE STATEMENT OF MR. KHADIM SHAH EX-SUPERINTENDENT CHARSADDA:

Khadim Shah recorded his statement and clarified that he visited office of the DEO (F) Battagram to verify the service documents of Mst. Nazma by hand on 14/4/2013 and checked all the record their but due to absence of DEO (F) Battagram on that day he left the record for signatures/verification. Later on, the verification was sent to DEO (F) Charsadda vide letter no 74/verification Dated 17/4/2013 through post/ Mail. (Annexure-XXIII). He also provided guidance certificate signed by the then DDEO Battagram, Mr. Fida Muhammad (Annexure-XXIV). It is astonishing that all the record was also signed by the same DDEO but not provided by hand and sent that through post.

ORIGIN OF THE ISSUE:

During visit of DEO (F) Office Charsadda, the DEO female told that she requested for the enquiry after the anticorruption Charsadda sent a letter to her office on 25/9/17, regarding detail of the teachers who were transferred from other districts and FATA from 2006 onward. (Annexure-XXV). Hence, a letter for the verification of service documents was again sent vide letter no 7972/Dated 21/10/2017 to DEO (F) Battagram. (Annexure-XXVI). Reminder for verification was sent vide endorsement no 18919 dated 3/2/2018. (Annexure-XXVII). The documents were received duly verified, vide letter no 5390 Dated Battagram the 9/3/2018 bearing signatures like the then DEO (F) Battagram MST Rehana Yasmin. (Annexure-XXVIII). The DEO Charsadda was worried about fake appointments so, she sent the documents to the DEO (F) Battagram for reverification through Email. In reply an email was sent by the DEO (F) Battagram in which she told that not only the verification letter was fake but also the dispatch number on the letter did not match with the dispatch register. (Annexure-XXIX). It is to be noted that District accounts office Battagram verified her LPC vide letter no 174 DAO/BM Dated 04/2013 (Annexure-XXX a, b).

Findings

From the available record of both the DEO (F) Offices, statement of all the people/officials concerned, it is clear that;


- The appointment order is fake and bogus.

- Teacher attendance register of GGMS Shamlae revealed that she had never been a part of that school.
- The salary record was not traceable from Battagram.
- Transfer order issued by the directorate was also not confirmed as the file was missing in the directorate.
- The academic documents provided were also not verified by the institutions concerned.
- Verification of all document also proved to be fake.
- The ministerial staff in the female DEO office are responsible for the loss or non-production of official record. One can only wonder how salary was started without appointment order and verification of academic documents.

### RECOMMENDATIONS

1. The fake appointment order produced by Mst. Nazma may be treated as of no effect and be treated as null and void ab initio. The DEO (F) Charsadda may register a FIR in the Anti-Corruption against the said teacher.
2. All amount taken as salary may be recovered and refund to government exchequer.
3. An in-depth inquiry may be initiated against the Ministerial staff of DEO office Battagram and establishment branch in Directorate for their casual handling of the office record and squandering valuable official record pertaining to the appointment /transfer and they should then be proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
4. DEO female office Battagram may be directed to bring her house in order, recover the official record of her office and secure them from loss.

The report is submitted for perusal and further necessary action under the rules, please.

  
12/24/19

Miss Naheed Anjum

Deputy Director

E&SE Khyber Pakhtunkhwa



Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

208

2839

No \_\_\_\_\_ F. No. Inquiry/2019  
Dated Peshawar 13/2/2019

To.

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Subject:- Inquiry Report.

Memo.

P-193

Reference notification No.9749-51 Dated 26-10-2018 wherein the under signed was app as Inquiry Officer in r/o Mst. Nazma Ali C.T transfer from District Batagram to district Charsadda.

Please find attached herewith the inquiry report for information and further necessary

*Mehal*

Deputy Director (B/TRG)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

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

Copy for information to the.

- 2. PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

Deputy Director (B/TRG)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

1755  
15/2

ADDE.

The inquiry report may be  
imp commented in letter  
of spirit.

14/2/19

DD(P) 329  
14-2-19

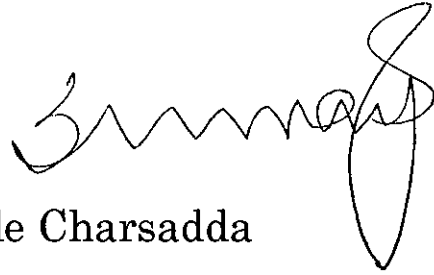
14/2

Zahid  
15/2

## AUTHORITY LETTER

It is certified that Miss Roheela Saddique ADEO Litigation Elementary & Secondary Education Department, Govt: of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit para wise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar in Case Titled SHAMA BEGUM, ZIA GUL, NIGHAT SEEMA, NAZMA ALI vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.

DEO



Female Charsadda

E&SE Department Peshawar

SUMAYYA BEGUM

RESPONDENT NO