

28.05.2018

Bench is incomplete. To come up for order
on 31.05.2018 before D.B



Member

31.05.2018

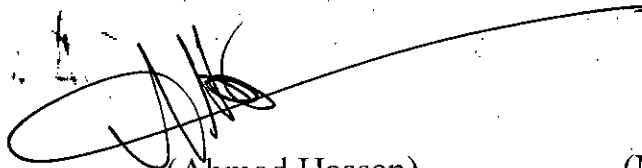
Learned counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General for the respondents present.

8

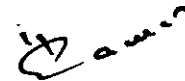
Vide separate common judgment of today placed on file of service appeal bearing No.298/2016, this Tribunal is constrained to issue direction to the respondent department to adjust/reinstate the appellant at the post C.T with immediate effect without back benefits. The present service appeal is accepted in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

31.05.2018



(Ahmad Hassan)
Member



(Muhammad Hamid Mughal)
Member

10.04.2018


Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Last opportunity granted. To come up for record and arguments on 23.04.2018 before the D.B.


Member


Chairman

23.04.2018

Learned counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General alongwith Ahmad Khan AEO for the respondents present. Arguments heard. To come up for order on 08.05.2018 before D.B


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member


08.05.2018


The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come on 28.05.2018


READER

08.02.2018


Counsel for the appellant and Addl. AG alongwith Daud Jan, Superintendent for the respondents present. Due to shortage of time, arguments could not be heard. To come up for record and arguments on 29.03.2018 before the D.B.


Member


Chairman

29.03.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Adjourned. To come up for record and arguments on 04.04.2018 before D.B.



Member


Chairman

04.04.2018

Counsel for the appellant and Addl; AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for record and arguments on 10.04.2018 before D.B.

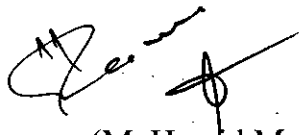

(Ahmad Hassan)
Member


(M. Hamid Mughal)
Member

17.08.2017

Junior to counsel for the appellant and Asstt. AG
alongwith Daud Jan, Superintendent for the respondents
present.

Since the matter in controversy has already been
resolved by the judgment of Hon'ble Peshawar High Court
reported as PLD 2014-Peshawar-132, there is no need to
decide this issue any further. The matter may be put up
before the D.B for decision on merits. To come up for
arguments before the D.B on 29.11.2017.



(M. Hamid Mughal)
Member



(Ahmad Hassan)
Member

29.11.2017

Counsel for the appellant Mr. Ziaullah, DDA
alongwith Mr. Daud Jan, Supdt for the respondents present.
Representative of the respondents is directed to bring
enquiry report and other documents. To come up for such
record and arguments on 08.02.2018 before the D.B.



Member



Chairman

Counsel for the appellant and Addl: AG for respondents present. Rejoinder submitted. To come up for arguments on 10.07.2017 before D.B.

(MUHAMMAD AMIR NAZIR)
MEMBER

(ASHFAQUE TAJ)
MEMBER

07.03.2017

Counsel for the appellant and Muhammad Jan, Government Pleader for the respondents present. Vide our detailed order of to-day in service appeal No. 261/2016, entitled "Hamid Ullah Khan Versus Director of Education FATA, FATA Secretariat, Peshawar and others" a special bench of 3 members is constituted in which Mr. Muhammad Hamid Mughal, Learned Member (Judicial) shall also be included in addition to the present bench. To come up for arguments on the point of jurisdiction on 17.08.2017.

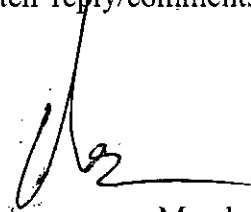
10.07.2017

Chairman

Member

24.08.2016

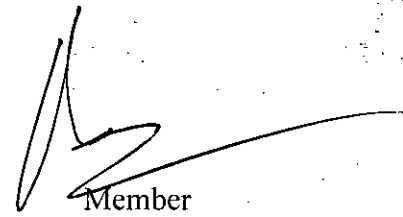
Clerk to counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl. AG for respondents present. Written reply not submitted. . Requested for further adjournment. Last opportunity is extended. To come up for written reply/comments on 3.11.2016 before S.B.



Member

03.11.2016

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for further adjournment. Another last opportunity is extended. To come up for written reply/comments on 12.01.2017 before S.B.



Member

12.01.2017

Counsel for the appellant and Mr. Daud Jan, Superintendent alongwith Additional AG for respondents present. Written statement by respondents No. 2 & 3 submitted. Learned Additional AG relies on the same on behalf of respondents No. 1 & 4. The appeal is assigned to D.B for rejoinder and final hearing for 07.03.2017 before D.B.



Chairman

14.4.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as C.T (BPS-15) GHS Kochi Kuram Agency when terminated from service vide impugned order dated 11.12.2015 on the allegations of irregularities in his appointment where-against he preferred departmental appeal on 18.12.2015 which was not responded and hence the instant service appeal on 28.03.2016.

That appointment of the appellant was made in accordance with provisions of Rule-10 of Khyber Pakhtunkhwa Civil Servants (Appointments, Promotion and Transfer) Rules, 1989 and that there was neither any illegality nor irregularity in the said appointment and, moreover, neither any enquiry was conducted nor any opportunity of hearing extended to the appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 15.06.2016 before S.B.


Chairman

15.06.2016

Counsel for the appellant and Asstt. AG alongwith Daud Jan, Supdt. for the respondents present. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 24.08.2016 before S.B.





Chairman

Appellant Deposited
Security & Process Fee

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 299/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.03.2016	<p>The appeal of Mr. Muhammad Saeed presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	29.3.16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>12.4.16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	12.04.2016	<p>Junior to counsel for the appellant present. Seeks adjournment. Case is adjourned for preliminary hearing to 26.4.2016.</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 299 /2016

MOHAMMAD SAEED

VS

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1- 4.
2.	Advertisement	A	5.
3.	Domicile certificate	B	6.
4.	Educational testimonials	C	7- 11.
5.	Appointment order	D	12.
6.	Charge report	E	13.
7.	Medical certificate	F	14.
8.	Attendance certificate	G	15- 30.
9.	Writ petition	H	31- 37.
10.	Impugned order	I	38- 39.
11.	Departmental appeal	J	40- 41.
12.	Vakalat-nama	42.

APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 299 /2016

K.W.P. Province
Service Tribunal
Diary No. 284
Dated 28-03-16

Mr. Muhammad Saeed, Ex: C.T (BPS-15),
Govt: High School Baza, Kurram Agency..... **APPELLANT**

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat, Warsak Road, Peshawar.
- 2- The Director of Education FATA, FATA Secretariat, Warsak Road, Peshawar.
- 3- The Additional Agency Education Officer, Lower & Central Kurram Agency at Sadda.
- 4- The Agency Account Officer, Kurram Agency.

..... **RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 11.12.2015 WHEREBY THE SERVICES OF THE APPELLANT HAS BEEN TERMINATED WITH EFFECT FROM THE DATE OF HIS APPOINTMENT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINTY DAYS.

PRAYER:

That on acceptance of this appeal the impugned order dated 11.12.2015 may be set aside and the respondents may be directed to re-instate the appellant with all back benefits w.e.f the date of his appointment. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

Handwritten signature and date
28/3/16

- 1- That the respondent No.3 through advertisement published in the Daily News Paper advertised various posts including the post of C.T (BPS-09) now (BPS-15). Copy of the advertisement is attached as annexure **A.**
- 2- That appellant having the Domicile of Kurram Agency and having the requisite qualifications for the said post applied and after participated in the test and interview the appellant was declared successful in the said selection process. That in

consequence the appellant was offered the said post through appointment order dated 18.01.2013. Copies of the Domicile Certificate, Education Testimonials and appointment order are attached as annexure **B, C & D.**

3- That in response to the said appointment order the appellant submitted his charge report along with medical certificate and started performing his duty at the concern station quite efficiently and up to the entire satisfaction of his superiors. Copies of the charge report and medical certificate are attached as annexure **E & F.**

4- That the service book of the appellant is also been prepared by the respondent No.3 and proper entry regarding the appointment of the appellant has been made by the respondent No.3 in the said service book of the appellant. That astonishingly right from appointment the salaries of the appellant has been withheld by the respondents without assigning any reason and clear justification. Copies of the attendance Register is attached as annexure **G.**

5- That appellant time and again visited the concerned quarter for the release of his salaries but of no avail, feeling aggrieved from the inaction of the respondents by not releasing the monthly salary of the appellant the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. W.P. 3602-P/2014 which is still pending adjudication before the august Peshawar High Court Peshawar. Copy of the Memo of writ petition No WP 3602-P/2014 is attached as annexure **H.**

6- That astonishingly the respondent No.3 issued the impugned order dated 11.12.2015 whereby the services of the appellant has been terminated with retrospective effect without conducting regular inquiry and without assigning any reason/clear justification. Copy of the impugned order dated 11.12.2015 is attached as annexure **I.**

7- That appellant feeling aggrieved from the impugned order dated 11.12.2015 filed Departmental appeal on 18.12.2015 before the respondent No.2 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure **J.**

GROUND:

- A- That the impugned order dated 11.12.2015 issued by the respondent No.3 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015.
- D- That no show cause notice has been served on the appellant by the respondent Department before issuing the impugned order dated 11.12.2015 against the appellant.
- E- That no regular inquiry has been conducted before issuing the impugned order dated 11.12.2015.
- F- That no chance of personnel hearing/personnel defense has been given to the appellant before issuing the impugned order dated 11.12.2015.
- G- That the impugned order dated 11.12.2015 has been issued by the respondents in violation of the principle of Locus Poenitentiae.
- H- That appellant has successfully completed his probationary period and has served the respondent Department for more than three years but inspite of that the respondent No.3 issued the impugned order dated 11.12.2015.
- I- That the respondent Department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 against the appellant.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 19.3.2016

APPELLANT

Muhammad Saeed
MUHAMMAD SAEED

THROUGH:

kh
NOOR MOHAMMAD KHATTAK
ADVOCATE
(0345-9383141)

درخواستیں

گلبرگ کیمپس کراچی کے پرائمری اسکولوں میں داخلہ کیلئے درخواستیں کی ختمیاری کی تاریخ 10 نومبر 2012ء تک ہے۔ اس کے بعد کسی بھی درخواست کو منظور نہیں کیا جائے گا۔ درخواستیں مع دستخط اور تصدیق شدہ کارڈز اور دیگر ضروری دستاویزات کے ساتھ جمع کروانی چاہئے۔

سلسلہ نمبر	درخواست کی تاریخ	مقام نمائندگی	مذکورہ	البتہ
1	30-11-2012	پارچہ کارآمد	35318	کسی بھی طلبہ شہداء اور اسے بھرتہ کیلئے اور اس کی سند مع شہداء الغالبہ ولا سلامہ کی سند مع تنظیم وفاق المدارس سے آیا ہے مرلی میں کیلئے اس کے سند مع تنظیم وفاق المدارس سے
2	03-12-2012	پارچہ کارآمد	ایسا	ایسا
3	04-12-2012	پارچہ کارآمد	ایسا	کسی بھی طلبہ شہداء اور اسے بھرتہ کیلئے اور اس کی سند مع شہداء الغالبہ ولا سلامہ کی سند مع تنظیم وفاق المدارس سے آیا ہے لی ایس ای سی دورہ مناسبت اسلامیات اور مرلی اور سند شہداء کا کسی بھی طلبہ شہداء تنظیم وفاق المدارس سے پاس سند
4	05-12-2012	پارچہ کارآمد	ایسا	ایسا
5	06-12-2012	پارچہ کارآمد	ایسا	کسی ثانوی تعلیمی بورڈ میں شہداء تنظیم وفاق المدارس سے منظور شہداء اور اطلاع سے سند اخذات مع ماڈرن آن سند
6	07-12-2012	پارچہ کارآمد	ایسا	ایسا
7	10-12-2012	پارچہ کارآمد	ایسا	لی ایس ای سی ایس ایس اور ڈگری کی سند مع شہداء اور سند سے مع ای سی سی سرٹیفکیٹ پارہ اول اور پلس وان ایگریگیشن
8	11-12-2012	پارچہ کارآمد	ایسا	ایسا
9	12-12-2012	پارچہ کارآمد	ایسا	لی ایس ای سی ایس ایس اور ڈگری کی سند مع شہداء اور سند سے مع ایک سالہ ایس ایس اور ایس ایس ایس سرٹیفکیٹ
10	13-12-2012	پارچہ کارآمد	ایسا	ایسا
11	14-12-2012	پارچہ کارآمد	ایسا	لی ایس ای سی ایس ایس اور ڈگری کی سند مع شہداء اور سند سے مع ایک سالہ JOPE سرٹیفکیٹ یا آئی سی سے ساری سرٹیفکیٹ یا دیگر مساوی ثابت
12	15-12-2012	پارچہ کارآمد	ایسا	ایسا
13	16-12-2012	پارچہ کارآمد	ایسا	ایس ایس ایس اور ڈگری کی سند مع شہداء اور سند لی ایس ای سی سرٹیفکیٹ یا پارہ اول ایگریگیشن کی سند اور اسے کسی بھی طلبہ شہداء اور اسے بھرتہ کیلئے اور اس کی سند مع شہداء اور سند لی ایس ای سی سرٹیفکیٹ یا پارہ اول ایگریگیشن کی سند اور اسے لی ایس ای سی سرٹیفکیٹ یا پارہ اول ایگریگیشن کی سند اور اسے
14	17-12-2012	پارچہ کارآمد	ایسا	ایسا
15	18-12-2012	پارچہ کارآمد	ایسا	ایسا
16	19-12-2012	پارچہ کارآمد	ایسا	ایسا
17	20-12-2012	پارچہ کارآمد	ایسا	ایسا
18	21-12-2012	پارچہ کارآمد	ایسا	ایسا

فارغ التحصیل طلبہ کی روٹ
پارچہ کارآمد

ادنیٰ امجد
25/10/2012

تعمیرات: (1) مرکی آخری سہ ماہیگی 10-11-2012 تک شمار کی جائیگی۔ (2) امیدواروں کے اوریجنل اور شناختی کارڈ میں منسلک سکول
کرم ایجنسی کی ہونی چاہئے۔ (3) نئے بھرتے ہونے والے امیدواروں کی تقرری غیر متعمد طور پر سول ملازمین کے ترجمہ شدہ ایکٹ اوپنیکیشن 2011 کے مطابق کی جائے گی۔
(4) اس اشتہار کے شائع ہونے کے بعد حکومت وقت کی طرف سے بھرتے کی طرف سے کارڈ یا ایس ایس ایس میں کوئی تبدیلی لائی گئی تو اس کے مطابق تقرریاں مل میں ملانی جائیگی۔ (5) کلرک کو یا ایس ایس ایس
کے وہ اس اشتہار کو دیکھنا یا اس کی کاپی بڑھانے کو منظور کرتے ہیں کہ اس کی عدالت میں شائع نہیں کیا جائے گا۔ (6) سند دروازہ کیلئے 02% کوئی سند ہے سند دروازہ کیلئے سند تک ریڈیکل ہونا
کارڈ کیلئے پیش کرنا ہوگا۔ (7) انٹرویو کیلئے کوئی ٹیبلڈ ڈال لینا ہونی چاہئے۔ (8) ایس ایس ایس کیلئے کوئی TANDA نہیں دیا جائے گا۔ (9) انٹرویو کے وقت تمام امیدواروں کو اصل اسناد
پیش کرنا لازمی ہوگا۔ (10) سرکاری ایڈوارڈس کے ذریعہ سے درخواستیں جن کرانیں۔ (11) درخواست نام دفتر کے اوقات کار میں حاصل کیے جاسکتے ہیں۔ (12) پہلے سے جاری شدہ
INOC اگر جاری ہونے ہیں تو اسے منظور تصور کیے جائیں۔ (13) امیدوار جس اسماء کیلئے درخواست دے گا تو اس اسماء کیلئے میرٹ لسٹ میں شامل کیا جائے گا۔ (14) تمام تقرریاں
بھرتہ کی بنیاد پر ایجنسی میں چرک یا ٹیم کی۔ (15) امیدواروں کی فیرٹیلیشن کا ریکارڈ کی بنیاد پر اس کو ملازمت سے برخواست کیا جاسکتا ہے۔ (16) انٹرویو کیلئے کوئی فیرٹیلیشن نہیں۔
(17) سرٹیفکیٹ اسناد ذیلی ہونے کی صورت میں FIR اور اس کی جائے کی اور کس نہیں کے حوالے کیا جائے گا۔

ATTESTED

B-5



No. _____ Ag, Dated Parachinar the _____
OFFICE OF THE POLITICAL AGENT KURRAM AGENCY

KURRAM DOMICILE

Certified that Mr. / Mrs. MUNDIRABD SAEED
Son/daughter of Mr. Haji Zae Bat Khan Belongs
to a recognized Tribe of Maso Rai Section Mando Bheel
Sub Section Nisra Rai and his/het father is/was a permanent
bonafide resident of village Jani Dora (C. Kurram Agency.

He/She is an eligible candidate to avail himself/herself of the seats reserved for
Tribal Areas Kohat Division Kohat Backward Area Kurram Agency.

Tehsildar Malhal/P.T. Alzal
Political Agent
PN/18/7/07

Asst. Political Agent
ASSISTANT POLITICAL AGENT
Control Section
18/7/07

Political Agent
Political Agent
18/25/7

ATTESTED

[Handwritten signature]

S. No, KB

46241

C-71

BOARD OF INTERMEDIATE & SECONDARY EDUCATION KOHAT



DETAILED MARKS CERTIFICATE Secondary School Intermediate Examination

SESSION (ANNUAL)

SCIENCE GROUP

Roll No. 710857

Name. Muhammad Saeed

Name. Zar Bat Khan

District/Institution. Govt. High School Sadda Kurram Agency

Subjects	Marks Allotted			Marks Obtained			In Words
	Theory/ Paper A	Practical/ Paper B	Total	Theory/ Paper A	Practical/ Paper B	Total	
1. English	75	75	150	40	41	81	Eighty-One
2. Urdu	75	75	150	34	43	77	Seventy-Seven
3. Islamiyat (Comp)	75	--	75	52	--	52	Fifty-Two
4. Pakistan Studies	75	--	75	47	--	47	Forty-Seven
5. Mathematics	75	75	150	49	44	93	Ninety-Three
6. Physics	85	15	100	53	11	64	Sixty-Four
7. Chemistry	85	15	100	35	10	45	Forty-Five
8. Biology	85	15	100	50	12	62	Sixty-Two
Total			900			521-C	Five Hundred Twenty-One Only
Remarks							

Note:- Errors/Omissions excepted.

Dated: 16-07-2007

Computer Cell, BI&E, Kohat (SMK) Checked by: sdController of Examinations
BI&E Kohat

ATTESTED

ATTESTED

[Signature]
 Altaf Banoosh
 S.E.T. BPS-16
 M.H.S. Sadda L.K.

S.No. KB 03739

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT
DETAILED MARKS CERTIFICATE
Higher Secondary School Certificate Examination



PRE-MEDICAL (Part-II)
SESSION 2009 (ANNUAL)

Reg. No. 026-BK/GDCSKA-2007

Roll No: 28419

Name MUHAMMAD SAEED

Father's Name ZAR BAT KHAN

Regular Student of: Govt Degree College Sadda Kurram Agency

Subjects	Marks Allotted	Marks Obtained					Marks in Words
		Part-I		Part-II		Total	
		Theory	Pract	Theory	Pract		
English	200	53	--	52	--	105	One Hundred Five
Urdu	200	--	--	69	--	126	One Hundred Twenty-Six
Islamic Education	50	--	--	--	--	42	Forty-Two
Pakistan Studies	50	--	--	34	--	34	Thirty-Four
Physics	200	--	--	51	12	140	One Hundred Forty Only
Chemistry	200	--	--	51	12	119	One Hundred Nineteen
Botany/Zoology	200	--	--	11	11	100	One Hundred Only

Total : 116

666-B Six Hundred Sixty-Six Only

Note: Errors / Omissions excepted.

Date : 26-07-2009

Computer Cell BISE, Kohat
(Tahir)

Remarks :

Checked by :

Controller of Examinations
BISE Kohat

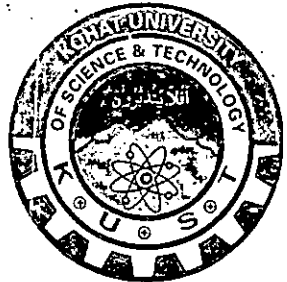
ATTESTED

Altaf Banqash
S.E.T. BPS-16
G.M.H.S. Saddah L.K.

ATTESTED

92

Serial No. 044225



Kohat University of Science & Technology, Kohat (Pakistan)

Detailed Marks Certificate Bachelor of Science (B.Sc) Part-II, Annual Examination, 2011

Name: Muhammad Saeed
Father's Name: Zarbat Khan

Roll Number: 21646
Registration Number: 2009-GDCSK-22

Certified that the candidate secured the following marks and has been placed in 1st Division

SUBJECTS	Maximum Marks	MARKS OBTAINED	
		In Figures	In Words
Zoology	75	38	Thirty-Eight
Chemistry	75	41	Forty-One
Botany	75	54	Fifty-Four
Pak Studios	40	18	Eighteen
Part-I Marks	285	179	One Hundred Seventy-Nine
Total	550	330	Three Hundred Thirty

ATTESTED

Attaf Baqash
SET EPS-16
C.M.H.S. Saddat F.K.

The examination was taken as a whole
To pass 40% marks in each subject (Written & Practical Sep
45% marks in aggregate.

Result Declared on: 29-Aug-2011

Errors and omissions are subject to subsequent rectification.

**Verified & Found
Correct.**
Saeed

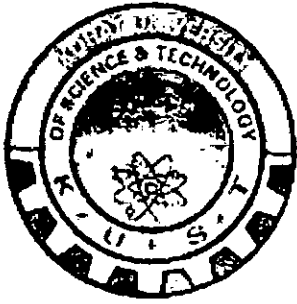
Controller of Examinations
Kohat University of Science & Technology
Kohat

CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan.

ATTESTED

10

Serial No. 259273



Kohat University of Science & Technology, Kohat (Pakistan)

DETAILED MARKS CERTIFICATE

Master of Arts (Political Science) Final Annual
Examination, 2014

Name: Muhammad Saeed

Roll No. 50696

Father's Name: Zarbat Khan

Registration No. 2009-GDCSK-22

Certified that the candidate secured the following marks and is placed in 2nd Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
Political Development, Social Change & Research Methodology - (VI)	100	50	Fifty
Muslims World and its Political Dynamics - (VII)	100	40	Forty
Political and Institutional Development in Pakistan - (VIII)	100	59	Fifty Nine
Economy of Pakistan - (IX)	100	53	Fifty Three
Pakistan in World Affairs - (X)	100	51	Fifty One
Viva	100	44	Forty Four
Previous Marks:	500	230	Two Hundred Thirty
Total	1100	527	Five Hundred Twenty Seven

The examination was taken in Parts

Result declared on 24-Dec-14

Talwar

marks and percentages are subject to

CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan

ATTESTED

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



110

Serial No. 97798

Name MUHAMMAD SAEED
 Father's Name ZAR BAT KHAN
 Address MUHAMMAD JAVID STATIONARY
 BANGASH MARKET SADDA
 Tehsil KORRAM AGENCY
 District KORRAM AGENCY

Roll No. AG655480
 Registration No. 10AKM00081
 Final Semester AUT- 2010

has successfully completed **CERTIFICATE OF TEACHING**

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 10	0638	TEACHING STRATEGIES & EVALUATION	100	58
SPR- 10	0633	SCHOOL ORGANIZATION	100	58
SPR- 10	0632	EDUCATIONAL PSYCHOLOGY	100	70
SPR- 10	0631	DIMENSIONS IN EDUCATION	100	68
AUT- 10	0634	ENGLISH AND ITS TEACHING	100	55
AUT- 10	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	89
AUT- 10	0605	SOCIAL STUDIES & TEACHING	100	64
AUT- 10	0635	ISLAMIAT AND ITS TEACHING	100	64
AUT- 10	0604	URDU LANGUAGE AND ITS TEACHING	100	60

Department Of Examinations
 Certificate Section
VERIFIED
 Certificate/Degree/Diploma/Transcript
 bearing Sr. No. 97798 is
 checked & found correct.
 Signatures: _____

ATTESTED

 G.M.H. S. L.K.

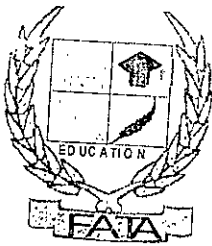
CREDITS: 5
 Result Declared on AUGUST 06, 2011
 Date of issue AUGUST 15, 2011

Total Marks / Obtained 900 / 586
 Percentage / Grade 65 B

Controller of Examinations

Disclaimer:
 This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

ATTESTED



**ADD: AGENCY EDUCATION
OFFICE SADDA KURRAM AGENCY.**

PHONE. 0926-520674 FAX 0926520674

No. _____/Edu:

Dated Sadda: the ____/____/2013

APPOINTMENT.

Consequent upon the approval by the Selection Committee, the appointment of the following CT teachers are hereby ordered in the school noted against their names against vacant CT posts purely on Regular contract basis in BPS No.9 Plus usual allowances as admissible under the rules with effect from 01.03.2013

D-12

S #	Name of Candidate	Father Name	School where Appointed	Remarks
1	Ishaq Khan	Malik Jan	GMS Ossai	Against Vacant Post
2	Muhammad Haleem	Muhammad Nazir	GHS Paloseen	---do---
3	Ayaz Khan	Noor Hussain	GHS Minatoo	---do---
4	Abdur Rehman	Eida Khan	GMS Samkhakak	---do---
5	Hussain Ahmad	Muhammad Rafiq	GMS Jilamy CK	---do---
6	Syed Hassan	Muhammad Hassan	GMS Tarai	---do---
7	Ismail Khan	Abdul Habib	GHS Badama	---do---
8	Ferooz Khan	Gul Zam Khan	GHS Baza	---do---
9	Taj Ahmad	Lal Muhammad	GMS Gandaw	---do---
10	Farooq Muhammad	Arab Gul	GMS Taudy Oby	---do---
11	Sabir Gul	Noor Gul	GMS Samkhakak	---do---
12	Aziz ur Rehman	Sayed Rehman	GMS Jilamy CK	---do---
13	Muhammad Ayaz	Gul Karim	GHS Paloseen	---do---
14	Ajab Khan	Gul Muhammad	GHS Baza	---do---
15	Muhammad Saeed	Zar Bat Khan	GHS Baza	---do---
16	Muhammad Siddique	Abdul Rashid	GMS Ossai	---do---
17	Latif Hussain	Inam Hussain	GHS Anguri	---do---

TERMS/CONDITIONS.

1. They are directed to produce their Medical certificate from the Medical Supdt:AHQ Hospital Sadda Kurram Agency
2. Their age should be between 18-35 years .
Their appointment is purely made on temporary and Regular contract basis and liable to termination at any time without assigning any notice, in case of resignation wants to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu of notice.
3. No payment will be made to the appointee if his/her academic and professional certificate are not got verified from the Issuing Authorities concerned.
4. If they failed to take over charge within 15 days their appointment will automatically be considered as cancelled.
5. Charge reports should be submitted to the concerned authority.
6. Their appointment will be considered as temporary but without Pension/gratuity on the term of section-15 of the KPK Civil Servant Act 1973 as amended with civil servants amendment Act: 2003 but will be entitled to contribution Provident Fund at such rate as prescribed by the govt.

No 156-77 / Edu Dated 15/11 /2013

Copy forwarded to the.

1. Director of Education FATA KPK Peshawar.
2. Agency Account officer Parachinar.
3. Political Agent Kurram Parachinar.
4. Asstt:Political Agent Central Kurram .
5. Teachers Concerned.
6. Headmaster concerned..
6. Office file.

ATTESTED

Add: Agency Education Officer
Lower & Central Kurram Sadda

Add: Agency Education Officer
Lower & Central Kurram Sadda

E-13

CHARGE REPORT

I Mr/Miss Muhammad Saeed S/O Zarbat Khan

Have taken of the charge of COT Post BPS 09

at G.H.S Baza C.K on 17-01-2013

Fore Noon vide Add:AEO Endst:No 77 dated 15-01 2013

Signature of Receiving
Govt:Servant Muhammad Saeed

Signature of Relieved
Govt:Servant ULAS KHAN



[Signature]
Add: Agency Education Officer
Sadda Kurram Agency

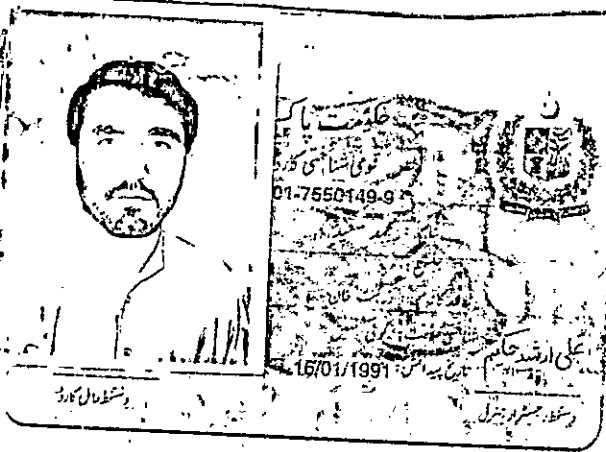
ATTESTED

[Signature]

(F-14)

THQ HOSPITAL SADDA KURRAM AGENCY.
ID AGE CERTIFICATE

SAEED



S/O SADDA CENTRAL KURRAM AGENCY

Exact Height by measurement, 5 FEET INCH

Personal mark of identification, Nil

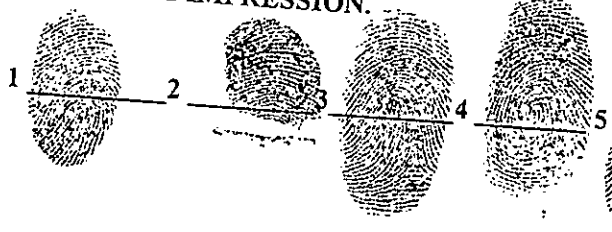
Signature of Official, _____ [Signature]

Signature of head of the Office, _____

Seal of Office

It is certified that I examined, MR. MAD SAEED S/O ZAR BAT KHAN
Candidate for employment in the Office of the EDUCATION DEPARTMENT KURRAM
and cannot discover that he has any communicable Diseases OR
other mentally & physically abnormality OR bodily infirmity except nil. I do
not consider this as disqualification for employment in the office of the
EDUCATION DEPARTMENT KURRAM. His age is according to his CNIC and School
Leaving Certificate is (22 years 1 Months) and by appearance about (22Years).

LEFT HAND THUMB AND
SIGNATURE IMPRESSION.



[Signature]
SMO Incharge THQ
Hospital SADDA
Dated, 6/1/2013
T.H.Q. Hospital
Sadda Kurram Agency
[Signature]
Countersigned.
Medical Superintendent,
Agency Head Quarter Hospital
Parachinar.

Medical Superintendent
Agency Head Quarter Hospital
Parachinar

ATTESTED

[Signature]

بازار سبزیجات و میوه ها
بازار سبزیجات و میوه ها
بازار سبزیجات و میوه ها
بازار سبزیجات و میوه ها
بازار سبزیجات و میوه ها
بازار سبزیجات و میوه ها

ردیف	نوع	مقدار	قیمت	توضیحات
1	سیب زمینی	1000	10000	
2	کلم	500	5000	
3	گوجه سبز	2000	20000	
4	هویج	1500	15000	
5	پیاز	3000	30000	
6	فلفل سبز	1000	10000	
7	فلفل قرمز	1000	10000	
8	لوبیا	2000	20000	
9	عدس	1500	15000	
10	کنجد	1000	10000	
11	کدو	1000	10000	
12	کرفس	1000	10000	
13	شیراز	1000	10000	
14	سیر	1000	10000	
15	زیر	1000	10000	
16	باز	1000	10000	
17	باز	1000	10000	
18	باز	1000	10000	
19	باز	1000	10000	
20	باز	1000	10000	
21	باز	1000	10000	
22	باز	1000	10000	
23	باز	1000	10000	
24	باز	1000	10000	
25	باز	1000	10000	
26	باز	1000	10000	
27	باز	1000	10000	
28	باز	1000	10000	
29	باز	1000	10000	
30	باز	1000	10000	

تفصیل قیمت

تفصیل قیمت در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز
تفصیل قیمت در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز
تفصیل قیمت در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز
تفصیل قیمت در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز
تفصیل قیمت در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز در سابقه نیز

Change on 22-3-013

حصول شدہ صلح کریم کے تحت
 حسیہ حاضری مدرسہ متعلقہ گورنمنٹ ہائی اسکول بازہ
 اپریل 2013ء
 بابت ماہ

نمبر عہدہ	نمبر رشد خان عہدہ Lab.			نمبر اشتقاقی SS-T			نمبر فضل محمد D.M			نمبر میروز خان C.T		
	آند	دستخط	رواگی	آند	دستخط	رواگی	آند	دستخط	رواگی	آند	دستخط	رواگی
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												
31												

تفصیل رخصت

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان

Head Master
 GRSB, Central
 Kurram Agency

قروغ تعلیم علمینڈی پشاور صدر

پر مشتمل کے دستخط، ڈائریکٹر، گورنمنٹ اور نام ملے

ATTESTED

حسب حاضرین مدرسین متعلقہ گورنمنٹ پبلک سکول باہر تحصیل لہہ ضلع کراچی
 بابت ماہ 2013

نمبر	حسب خان صاحب			حسب خان صاحب			حسب خان صاحب			حسب خان صاحب		
	آمد	دستخط	ادائیگی	آمد	دستخط	ادائیگی	آمد	دستخط	ادائیگی	آمد	دستخط	ادائیگی
1	800	حسب	1000	800	حسب	1000	800	حسب	1000	800	حسب	1000
2	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
3	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
4	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
5	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
6	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
7	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
8	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
9	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب	حسب
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												
31												

تفصیل رخصت

رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان

Head Master
 GHS-Bahra Central
 Curram Agency

ATTESTED

حسبہ فاضلہ مدرسین متعلقہ
 جون 2013ء
 پرائمری
 مکتبہ اعلیٰ

پہلا نمبر			دوسرا نمبر			تیسرا نمبر			چوتھا نمبر			پنجم نمبر		
پہلا نمبر			دوسرا نمبر			تیسرا نمبر			چوتھا نمبر			پنجم نمبر		
پہلا نمبر			دوسرا نمبر			تیسرا نمبر			چوتھا نمبر			پنجم نمبر		
پہلا نمبر			دوسرا نمبر			تیسرا نمبر			چوتھا نمبر			پنجم نمبر		
پہلا نمبر			دوسرا نمبر			تیسرا نمبر			چوتھا نمبر			پنجم نمبر		
1														
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
13														
14														
15														
16														
17														
18														
19														
20														
21														
22														
23														
24														
25														
26														
27														
28														
29														
30														
31														

مدرسین متعلقہ
 مکتبہ اعلیٰ

تہ ذیل رخصت

حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان

حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان

Master
 GHS
 Kurram Agency

ATTESTED

Handwritten signature

تحصیل میں ضلع کریم نگر
 سکول نازہ
 Sept 2008

حسب حاضری مدرسین متعلقہ
 بابت ماہ

نمبر مدرسین	نمبر مدرسین			نمبر مدرسین		
	آمد	دستخط	دستخط	آمد	دستخط	دستخط
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						

نمبر مدرسین	نمبر مدرسین			نمبر مدرسین		
	آمد	دستخط	دستخط	آمد	دستخط	دستخط
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						

رخصت

تف

میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ

میزان	حال	سابقہ	میزان	حال	سابقہ

Head Master -
 GHS Baza Central
 Kurram Agency

ATTESTED

Handwritten signature

ATTACHED

CHSBA District
Central Agency

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

Handwritten signatures and dates at the bottom of the page, including the name "Habib Khan HM" and the date "2013".

Handwritten text in Urdu script, possibly a signature or official statement.

Handwritten text in Urdu script, including a signature and possibly a date or reference number.

ردیف	نام	تاریخ	نوع	محل	تاریخ	نوع	محل	تاریخ	نوع	محل	تاریخ	نوع	محل	تاریخ	نوع	محل
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30

Handwritten text in Urdu script, possibly an address or organizational name.

ATTENDED

Handwritten mark or signature.

تفصیل سہ ماہی امتحان کے نتائج
 حیدرآباد میں متعلقہ GHS سکول
 بابت ماہ نومبر 2013ء

نمبر	حصہ اول			حصہ دوم			حصہ سوم			حصہ چوتھ		
	امد	دستخط	امد	دستخط	امد	دستخط	امد	دستخط	امد	دستخط	امد	دستخط
1	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
2	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
3	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
4	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
5	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
6	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
7	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
8	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
9	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
10	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
11	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
12	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
13	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
14	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
15	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
16	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
17	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
18	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
19	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
20	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
21	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
22	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
23	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
24	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
25	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
26	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
27	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
28	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
29	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف
30	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف	8:15	صنف	1:30	صنف

Handwritten signature and name in the center of the table.

تفصیل رخصت

نمبر	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												

Head Master
 GHS Central
 Kurram Agency

ادارہ فروغ

ATTESTED

رہنما حاضری ہدایت متعلقہ CHS سکول تاریخ 2019 May 5 بابت ماہ

نمبر نمبر نمبر	① سب سے پہلے		② درمیان		③ آخر		④ سب سے پہلے		نمبر نمبر نمبر
	آد	دستخط	آد	دستخط	آد	دستخط	آد	دستخط	
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									

SUNDAY

proble...

DATE and

SUNDAY

SUN-DAY

SUNDAY

C/leave

SO

تفصیل رخصت

نمبر	نمبر	نمبر	نمبر	نمبر	نمبر	نمبر	نمبر	نمبر	نمبر

Head Master
Gita Baza Central
Kurram Agency

ATTESTED

Handwritten signature

محکمہ نصاب تعلیم

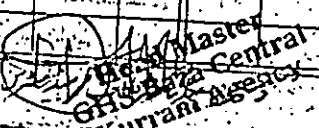
تہذیب و تمدن مدرسہ متعلقہ
بابت ماہ June جون

روز	صنف ۱			صنف ۲			صنف ۳			صنف ۴		
	آند	درخت	راستی	آند	درخت	راستی	آند	درخت	راستی	آند	درخت	راستی
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												

تفصیل کے ساتھ نصاب تعلیم

تفصیل

نمبر	حال	سابقہ	میزان	حال	سابقہ	میزان



سرگرمیوں کے ذریعے نصاب تعلیم کو زیادہ دلچسپ بنانے کے لیے اس نصاب کی تیار کردہ کاپیوں کو اس ادارے کے ذریعے جاری کیا گیا ہے۔

ATTESTED

[Signature]

مدرسه ہائے تعلیم و تربیت گھنٹہ گھر سکول گھنٹہ گھر
 چھٹی منزل، کلاں، ضلع کراچی۔
 تاریخ: ۱۱/۸/۲۰۱۹ء

نمبر	نمبر ۱			نمبر ۲			نمبر ۳			نمبر ۴		
عہدہ	اند	دستخط	راہگی	اند	دستخط	راہگی	اند	دستخط	راہگی	اند	دستخط	راہگی
۱												
۲	(Large handwritten signature)											
۳												
۴												
۵												
۶												
۷												
۸												
۹												
۱۰	SUNDAY											
۱۱												
۱۲												
۱۳												
۱۴	1st August											
۱۵												
۱۶	Sun day											
۱۷												
۱۸												
۱۹												
۲۰												
۲۱												
۲۲												
۲۳												
۲۴	SUNDAY											
۲۵												
۲۶												
۲۷												
۲۸												
۲۹	SUNDAY											
۳۰												
۳۱												

تفصیل رخصت

نمبر	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
۱												
۲												
۳												
۴												

Principal
 GHS Kurram Agency
 Kurram Agency

ادارہ فروغ تعلیم - گلشنی پشاور

ATTESTED

(Handwritten signature)

سندھ کونسل
تعمیراتی
September 2014

گورنمنٹ مائیکرو ٹیکنالوجی
جسٹس ہاؤس
بابت ماہ

نمبر	حیف خان		اشتیاق احمد		سید سعید		سید خالد	
	اند	دستخط	اند	دستخط	اند	دستخط	اند	دستخط
1	8:00	غنت	8:00	غنت	8:00	غنت	8:00	غنت
2	9:00	غنت	9:00	غنت	9:00	غنت	9:00	غنت
3	10:00	غنت	10:00	غنت	10:00	غنت	10:00	غنت
4	11:00	غنت	11:00	غنت	11:00	غنت	11:00	غنت
5	12:00	غنت	12:00	غنت	12:00	غنت	12:00	غنت
6	1:00	غنت	1:00	غنت	1:00	غنت	1:00	غنت
7	2:00	غنت	2:00	غنت	2:00	غنت	2:00	غنت
8	3:00	غنت	3:00	غنت	3:00	غنت	3:00	غنت
9	4:00	غنت	4:00	غنت	4:00	غنت	4:00	غنت
10	5:00	غنت	5:00	غنت	5:00	غنت	5:00	غنت
11	6:00	غنت	6:00	غنت	6:00	غنت	6:00	غنت
12	7:00	غنت	7:00	غنت	7:00	غنت	7:00	غنت
13	8:00	غنت	8:00	غنت	8:00	غنت	8:00	غنت
14	9:00	غنت	9:00	غنت	9:00	غنت	9:00	غنت
15	10:00	غنت	10:00	غنت	10:00	غنت	10:00	غنت
16	11:00	غنت	11:00	غنت	11:00	غنت	11:00	غنت
17	12:00	غنت	12:00	غنت	12:00	غنت	12:00	غنت
18	1:00	غنت	1:00	غنت	1:00	غنت	1:00	غنت
19	2:00	غنت	2:00	غنت	2:00	غنت	2:00	غنت
20	3:00	غنت	3:00	غنت	3:00	غنت	3:00	غنت
21	4:00	غنت	4:00	غنت	4:00	غنت	4:00	غنت
22	5:00	غنت	5:00	غنت	5:00	غنت	5:00	غنت
23	6:00	غنت	6:00	غنت	6:00	غنت	6:00	غنت
24	7:00	غنت	7:00	غنت	7:00	غنت	7:00	غنت
25	8:00	غنت	8:00	غنت	8:00	غنت	8:00	غنت
26	9:00	غنت	9:00	غنت	9:00	غنت	9:00	غنت
27	10:00	غنت	10:00	غنت	10:00	غنت	10:00	غنت
28	11:00	غنت	11:00	غنت	11:00	غنت	11:00	غنت
29	12:00	غنت	12:00	غنت	12:00	غنت	12:00	غنت
30	1:00	غنت	1:00	غنت	1:00	غنت	1:00	غنت

تفصیل

نمبر	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												

Head Master
Central
GHS
Agency

ادارہ فروغ تعلیم غلامی بشارت صدر

ATTESTED

(Signature)

حکومت پاکستان کی وزارت برائے تعلیم و تربیت
 حکومت پاکستان
 وزارت برائے تعلیم و تربیت
 بابت ماہ اکتوبر 2014

نمبر (3)	نمبر (2)			نمبر (1)		
	نمبر (3)	نمبر (2)	نمبر (1)	نمبر (3)	نمبر (2)	نمبر (1)
1	8:00	11:00	1:30	8:00	11:00	1:30
2	8:00	11:00	1:30	8:00	11:00	1:30
3	8:00	11:00	1:30	8:00	11:00	1:30
4	8:00	11:00	1:30	8:00	11:00	1:30
5	8:00	11:00	1:30	8:00	11:00	1:30
6	8:00	11:00	1:30	8:00	11:00	1:30
7	8:00	11:00	1:30	8:00	11:00	1:30
8	8:00	11:00	1:30	8:00	11:00	1:30
9	8:00	11:00	1:30	8:00	11:00	1:30
10	8:00	11:00	1:30	8:00	11:00	1:30
11	8:00	11:00	1:30	8:00	11:00	1:30
12	8:00	11:00	1:30	8:00	11:00	1:30
13	8:00	11:00	1:30	8:00	11:00	1:30
14	8:00	11:00	1:30	8:00	11:00	1:30
15	8:00	11:00	1:30	8:00	11:00	1:30
16	8:00	11:00	1:30	8:00	11:00	1:30
17	8:00	11:00	1:30	8:00	11:00	1:30
18	8:00	11:00	1:30	8:00	11:00	1:30
19	8:00	11:00	1:30	8:00	11:00	1:30
20	8:00	11:00	1:30	8:00	11:00	1:30
21	8:00	11:00	1:30	8:00	11:00	1:30
22	8:00	11:00	1:30	8:00	11:00	1:30
23	8:00	11:00	1:30	8:00	11:00	1:30
24	8:00	11:00	1:30	8:00	11:00	1:30
25	8:00	11:00	1:30	8:00	11:00	1:30
26	8:00	11:00	1:30	8:00	11:00	1:30
27	8:00	11:00	1:30	8:00	11:00	1:30
28	8:00	11:00	1:30	8:00	11:00	1:30
29	8:00	11:00	1:30	8:00	11:00	1:30
30	8:00	11:00	1:30	8:00	11:00	1:30

تفصیل رخصت

میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ

Head Master
 GHS Kurram Agency
 Kurram Agency

ATTESTED

مستند شدہ اور تصدیق شدہ

H-31

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 3602-P /2014

Farooq Muhammad and others.....Petitioners

VERSUS

Additional Chief Secretary, FATA & others.....Respondents

INDEX

S.No	Description of Documents	Annex	Pages
1.	Writ Petition		1-5
2.	Affidavit		6
3.	Addresses of Parties		7-8
4.	Copy of advertisement	A	9
5.	Copy of order/ appointment letters	B	10-22
6.	Copies of medical certificates	C	23-44
7.	Copy of charge reports	D	45-68
8.	Copy of attendance sheets	E	69-75
9.	Copies of appeals	F	76
10.	Court Fee		77
11.	Wakalat Nama		78

Through

Petitioner

Adnan Khattak

Adnan Khattak

Advocate, Peshawar

Cell: 0300-5930703

Date: .11.2014

ATTESTED

[Signature]

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2014

- ✓ 1. Farooq Muhammad S/o Arab Gul
- ✓ 2. Muhammad Saeed S/o Zarbat Khan
3. Ajab Khan S/o Gul Muhammad
- ✓ 4. Latif Hussain S/o Inam Hussain
5. Muhammad Ayaz S/o Gul Karim
6. Aziz ur Rehman S/o Said Rehman
7. Taj Ahmad S/o Lal Muhammad
8. Feroz Khan S/o Gul Zaman khan
9. Said Hassan S/o Muhammad Hassan
10. Hussain Ahmad S/o Muhammad Rafiq
- ✓ 11. Wahid Zaman S/o Zawta Khan
12. Mst. Muzlifa D/o Muhammad Farooq
13. Muhammad Yousaf S/o Abdul Aziz
- ✓ 14. Aqib Zaman S/o Syed Amir Shah (All CT Teachers,
Lower & Central Kurram Agency)
15. Khiyal Bat Khan S/o Hibat Khan
16. Kifayatullah S/o Mir Jehan
- ✓ 17. Zar Taj Bibi D/o Haji Ajmir Khan (All PET Teachers,
Lower & Central Kurram Agency)
18. Noor Zaman S/o Noor Jamal
- ✓ 19. Mst. Shamim Bibi D/o Spin Gul

ATTESTED

- ✓ 20. Parveen Bibi D/o Spin Gul (All DM Teachers, Lower & Central Kurram Agency)
- ✓ 21. Siraj ud Din S/o Walayat Khan
- 22. Zubair Khan S/o Ghafoor Khan (Both Junior Clerks/JC, Lower & Central Kurram Agency)
- 23. Rehmatullah S/o Muhammad Rahim (Pesh Imam, Lower & Central Kurram Agency)
- 24. Rashid Khan S/o Khadi Khan (Lab Assistant)

.....PETITIONERS

V E R S U S

- 1. Additional Chief Secretary, FATA
FATA Secretariat, Warsak Road, Peshawar
- 2. Secretary Finance,
Govt of KPK, Civil Secretariat, Peshawar
- 3. Additional Agency Education Officer,
Lower & Central Kurram, Sadda
- 4. Agency Account officer, Parachinar
- 5. Director of Education, FATA KPK, Peshawar

.....RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973**

Respectfully Sheweth:

- 1. That the respondent No.3 (Additional Agency Education Officer, Lower & Central, Kurram Sadda)

ATTESTED



(34)

floated advertisement in daily newspapers about the posts of PET, CT, Lab Assistant etc and petitioners, being eligible and qualified, applied for the same for selection on merit as such. (Copy of advertisement is attached as Annexure "A").

2. That the petitioners were interviewed and after going through the prescribed procedure of selection, they were, on the recommendation of Departmental Selection Committee appointed as such vide orders/ letters dated 15.01.2013, 18.01.2013 and 21.01.2013 respectively. (Copy of order/ appointment letters are attached as Annexures "B").
3. That petitioners were performing their duties with full devotion, after carrying-out their medical examination and taking charge on their respective posts, performing their duties till date. (Copies of medical certificates are attached as Annexure "C", charge reports are Annexure "D" and attendance sheets are Annexure "E").
4. That petitioners contacted respondents for payments of their monthly salaries but were told time and again that the department is going to prepare bills for the purpose. Every month took such practice but no fruitful result was ever achieved.

ATTESTED



5. That petitioners were constrained to prefer their departmental appeals before the authorities but in vain. (Copies of appeals are attached as Annexure "F"). Hence, the petitioners being aggrieved, approached this Honourable Court, inter alia, on the following grounds

GROUND S:

- A. That from the date of appointments, petitioners are performing their duties on the respective posts till date.
- B. That respondents were contacted from time to time for payments of their monthly salaries but every time they were deceived with commitment to be paid the same in the next month.
- C. That when petitioners came to know that the department is not fulfilling its commitment for the purpose, they agitated the matter through representations, but without any response.
- D. That two junior clerks namely Sakhi Akbar S/o Siddique Akbar and Abidullah S/o Muhammad Ghulam were also appointed vide dated 18.01.2013 according to the same advertisement dated 25.10.2012, are receiving salaries from the respondent No.3 which is clear cut violation of Article 25 of the Constitution of Pakistan, 1973.

ATTESTED



E. That the act of the respondents by not paying the monthly salaries to the petitioners since the date of appointments, they are not only violating natural justice but also the cardinal principles of Islam.

F. That the petitioners are performing their respective duties honestly and the attendance sheets are duly attested by the Headmaster. (Copies are attached).

In view of the above, it is therefore, humbly prayed that on acceptance of this petition, this Honourable Court may graciously be pleased to:

- i. Direct the respondents to forthwith pay monthly salaries to the petitioners.
- ii. Any other relief available in the circumstances of the case, not specifically asked for, may also be granted to the petitioner.

Through

Petitioner
Adnan Khattak
 Adnan Khattak
 Advocate, Peshawar

Date: __.11.2014

CERTIFICATE:

Certified on instructions of my client that petitioners have not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.

Adnan Khattak
 ADVOCATE

LIST OF BOOKS:

- 1. Constitution of Islamic Republic of Pakistan, 1973
- 2. Any other law books according to need

Adnan Khattak
 ADVOCATE


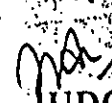
ATTESTED

[Signature]

PESHAWAR HIGH COURT, PESHAWAR.

37

FORM 'A'
FORM OF ORDER SHEET

S.No.	Date of order	Order or other proceedings with signature of the Judge
1	2	3
	1.12.2015.	<p><u>W.P.No.3602/2014.</u></p> <p>Present: Mr.Adnan Khattak, Advocate for the petitioners.</p> <p>Syed Qaiser Ali Shah, AAG for Provincial Government.</p> <p>Comments have not been filed. The latter seeks time to do the needful. May do so. Adjourned to a date in office.</p> <p style="text-align: right;">  <u>JUDGE</u> </p> <p style="text-align: right;">  <u>JUDGE</u> </p> <p><u>*M.Gul*</u></p>

ATTESTED



Additional Agency Education Officer
Lower & Central Kurram Agency.
NO 2037-93 /Edu
Dated 17/12/2015

TERMINATION ORDER

Consequent upon the direction by the competent authority, Director of Education FATA Peshawar vide his No 12228 dated 07.12.2015, on the decision of oversight committee the following in-eligible teaching/Non teaching appointees (M/F) BPS (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S. No	Name	Father Name	Desg.	B. No	Name of Institution	Remarks
1	Aqib Zaman	Said Amir Shah	CT	5	GHS Bagan	Terminated due to excess in sub divisional quota.
2	Muhammad Asif	Syal Khan	CT	5	GHS Makhizai	Terminated due to excess in sub divisional quota & advance appointment against on fill post.
3	Sara Bibi	Sakhi Mar Jan	DM	5	GHS Bagan	DM diploma found fake & bogus.
4	Shahid Mehmood	Haji Sher Shah	F	5	GHS Bagan	Diploma of JDPE found fake & bogus.
5	Muhammad Usman	Haji Shah Wazir	PET	5	GHS Arawali	Having no professional qualification.
6	Muhammad Alam Khan	Salam Khan	I/C	5	GHS Makhizai	Failed in typing test & rejected by enquiry officers.
7	Zubair Khan	Ghafoor Khan	I/C	5	GHS Bagan	Rejected by PA enquiry.
8	Muhammad Sadiq	Gul Mar Jan	I/C	5	GHS Alizai	Failed in typing test as per advertisement & rejected by enquiry officers.
9	Sakhi Akbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officers.
10	Sadia Batool	Abid Alam Jan	Lab/A-sstt	7	GGDC Alizai	Documents not provided for verification.
11	Muhammad Saeed	Zar Bat Khan	CT	9	GHS Bazar	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota.
13	Latif Hussain	Inam Hussain	CT	9	GHS Angori	Domestic holder of upper kurram.
14	Wahid Zaman	Zawta Khan	CT	9	GHS Dogar	Terminated due to excess in sub divisional quota
15	Farooq Muhammad	Arab Gul	CT	9	GMS Taudy Oby	Out of merit (M.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar Khan	CT	9	GGMS Dogar No-2	Terminated due to excess in sub divisional quota.

ATTESTED

[Signature]

17	Bibi Sakina	Haji Gul Akbar	CT						
18	Namreen Sadaf	Haji Amin Khan	DM						Terminated due to excess in sub divisional quota.
19	Shanaim Bibi	Spin Gul	DM						Documents not provided for verification.
20	Parveen Bibi	Spin Gul							Having no DM certificate & has not provide BA degree for verification.
21	Bibi Jamila	Niaz Bahadar Khan	DM						Having no DM certificate/diploma
22	Sajid Rehman	Haji Haider Khan	PET	9	GMS Dappa				JDPE diploma found fake & bogus.
23	Zia ul Alam	Noor Alam	PET	9	GMS Khazeena				JDPE diploma found fake & bogus.
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai				JDPE diploma found fake & bogus.
25	Kifayatullah	Mir Jehan	PET	9	GMS Kimal Baza				Having no professional documents.
26	Zar Taj Bibi	Haji Ajmir Khan	PET	9	GGMS Ossai				Having no professional documents & Lower Kurram domicile holder while she was appointed in Central Kurram, also appeared in CT (LK) while appointed as PET (CK).
27	Sajid Rehman	Said Aslam Khan	I/C	7	GHS Paloseen				Has been excluded by PA enquiry.
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatoo				Failed in typing test as per advertisement & rejected by enquiry officers.

[Signature]
 Addl: Agency Education Officer
 Lower & Central Kurram Sadda.

No 2987-93 /Edu: Dated 11 / 12 /2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for s...

Agency Education Officer
 Central Kurram Sadda.

ATTESTED

[Signature]

② ③

No. 1501

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Rs. 5 Ps.

Received a registered* addressed to _____

Date-Stamp _____

Initials of Receiving Officer _____ Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____ (in words) _____

Insurance fee Rs. _____ Ps. _____ Weight (in words) _____ Kilo. _____ Grams _____
Name and Address _____

ATTESTED

Handwritten signature

Before the Director of Education FATA
FATA Secretariat, Warsak Road,
Peshawar.

J-40

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER OF
ADDITIONAL EDUCATION OFFICE, KURRAM
AGENCY WHEREBY THE SERVICES OF THE
APPELLANT HAVE BEEN TERMINATED ON
11.12.2015.

Sir,

That the appellant states as under:

- 1) That according to the advertisement dated 25.10.2012 the appellant applied for the C.T post
- 2) That the appellant having the requisite qualification B. SC and C.T
- 3) That the interview was held on 10.12.2012.
- 4) That the appellant was selected and appointed as a C.T teacher ON GHS Baza ck dated 15.01.2013. by letter No 156-77
- 5) That the appellant performed their duties according to the entire satisfaction of their superiors.
- 6) That after a long time of three years an enquiry was conducted in the case of the appellant and the appellant was terminated on 11.12.2015 without any fault of the appellant.
- 7) That aggrieved with the order, the appellant has come before your honour on the following grounds:

GROUND:

- A. That all the acts and actions of the department is against law, facts, hence liable to be set aside.

ATTESTED

[Handwritten signature]

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER OF
ADDITIONAL EDUCATION OFFICER, KURRAM
AGENCY WHEREBY THE SERVICES OF THE
APPELLANT HAVE BEEN TERMINATED ON
11.12.2012

Sir,

That the appellant states as under

- 1) That according to the advertisement dated 22.10.2012 the appellant applied for the C.T post
- 2) That the appellant having the requisite qualification B.Sc and C.T
- 3) That the interview was held on 10.12.2012.
- 4) That the appellant was selected and appointed as a C.T teacher of the school dated 12.01.2013 by letter No 156-77
- 5) That the appellant performed their duties according to the entire satisfaction of their superiors
- 6) That after a long time of three years an enquiry was conducted in the case of the appellant and the appellant was terminated on 11.12.2012 without any fault of the appellant
- 7) That terminated in the order the appellant was come before you hence on the following grounds:

GRUONDS

1. That all the acts and actions of the department is against law, facts hence liable to be set aside

- (4)
- B. That the department has ignored the fact that the appellant has the requisite qualifications.
 - C. That the department has ignored the fact that the appellant has performed the duties for more than three years.
 - D. That the department has not followed the law of the superior courts.
 - E. That the selection was made according to law and rules by the department.

Therefore, it is requested that on acceptance of this appeal, the appellant may be reinstated in service with all back benefits.

Dated: 18.12.2015

Appellant


Muhammad saeed

s/o zarbat khan
Central Kurram Agency.

ATTESTED



VAKALATNAMA

IN THE COURT OF KPK Service Tribunal Peshawar

OF 2016.

Mohammad Saeed

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Department

(RESPONDENT)
(DEFENDANT)

I/We Mohammad Saeed

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2016

Mohammad Saeed
ATTESTED CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK
(ADVOCATE)

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: 299/16

Mr. Muhammad Saeed Ba-C.T
Kurram Agency Appellant.
GHS Dase VERSUS

1. Additional Chief Secretary FATA Secretariat Warsak Road Peshawar.
2. Director Education FATA Secretariat Peshawar.
3. Additional Agency Education Officer Lower & Central Kurram Agency
4. The Agency Account Officer Kurram Agency..... Respondents.

Para-wise comments on behalf of respondent No: 2 & 3

Respectfully Sheweth:

Preliminary Objections

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

On Facts:

1. Correct to the extent that advertisement was stated for different categories of post by Agency Education Officer, but the candidates applied were not eligible, as on various complaints inquiry was conducted and anomalies were found in the recruitment process.
2. Correct to the extent that appointment orders were issued to the petitioners and other candidates, but the respondents Department legally intervened and constituted search committee to trace out bogus degree holders, therefore, the committee submitted its report clearly picked out those candidates who had applied through fake/bogus degrees, report of search committee attached as (Annexure-A).
3. No comments. Subject to record.
4. The respondent department in order to investigate/inquire the anomalies carried out in recruitment process in Kurram Agency held inquiries and constituted search Committee. It is pertinent to mention here that the responsible Officer was charge Sheeted and proposed to the Government for necessary action under E&D rules. However the salaries of those candidates whose degree's/certificates were verified by the over-sight committee were ordered to be initiate against all those involved in fakism and forgery, copy of letter annexed as (Annexure-B) also a letter No. 12229-36 dated 07/12/2015 was addressed to Additional Agency Education Officer, Lower and Central Kurram Agency for the release of salaries of eligible candidates and terminate in-eligible candidates, copy of letter attached as (Annexure-C).
5. No comments. As explained in Para No.4 above.
6. No comments. As explained in Para No.4 above.
7. No comments. Pertains to record.

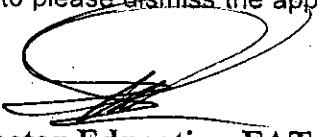
Grounds:

- A. Incorrect. Respondent has not taken any action which is against Law & facts.
- B. Incorrect. Respondents have acted according to law/policy as the appellant was wrongly appointed, therefore their appointment was liable to struck down under the law.
- C. As explained in Para-B above.
- D. No comments. As stated above in Para-B.
- E. Incorrect. As explained in Para-D above.

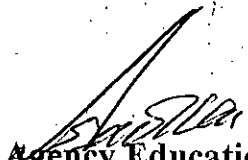
- F. No comments. Hence denied.
- G. No comments. Pertains to record.
- H. No comments. Pertains to record.
- I. No comments. As stated above.
- J. Respondents also seeks permission to advance other grounds at the time of arguments.

In light of the above facts it is humbly requested to please dismiss the appeal having no legal grounds with cost.

Respondent NO. 2


Director Education FATA

Respondent NO. 3


Addl: Agency Education Officer
Kurram at Parachinar


AFFIDAVIT

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

Respondent NO. 2


Director Education FATA

Respondent NO. 3


Addl: Agency Education Officer
Kurram at Parachinar

Better Copy

Additional agency Education officer
Lower & Central kurram agency
No. 2737-23/Edu
Dated 11-12-2015

32

TERMINATION ORDER

Consequent upon the direction by competent authority, Director of Education FATA Peshawar vide his no. 12228 dated 07-12-2015 on the decision of overnight committee the following in-eligible teaching/non teaching appointees (m/F) BPA (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S#	Name	F/Name	Desg:	B P S	Name of institution	Remarks
1	Aqib Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota
2	Muhammad Asif	Syal khan	CT	9	GHS Makhuzu	in sub divisional quota & advanced appointment against on fill post
3	Sara bibi	Sakhi mar jan	DM	9	GGMS Bagan	DM diploma found fake & bogus
4	Shahid Mehmood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of JDPE found fake & bogus.
5	Muhammad usman	Haji Shah wazir	Pet	9	GMS Arawali	Having no professional qualification
6	Muhammad Alam Khan	Salam khan	I/C	7	GHS Markuzai	Failed in typing test & rejected by enquiry officer.
7	Zubair Khan	Ghafoor Khan	I/C	7	GDC Bagan	Rejected by PA enquiry
8	Muhammad Sadiq	Gul Mar jan	I/C	7	GGDC Ahzair	Failed in typing test as per advertisement & rejected by enquiry officer
9	Sakhi Akhbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officer
10	Sadia Batool	Abid Alam Jan	Lab/A	7	GGDC	Documents not provided
11	Muhammad Saeed	Zar bat khan	CT	9	GHS	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota

70. Sakina	Mag. Education	1977	GMS Train
71. Anwar	Mag. Education	1977	GMS Train
72. Abdul Basit	Mag. Education	1977	GMS Dagar
73. Salween Basit	Mag. Education	1977	GMS Dagar
74. Sub. Jamil	Mag. Education	1977	GMS Dagar
75. Kamal Rehman	Mag. Education	1977	GMS Dagar
76. Asad Alam	Mag. Education	1977	GMS
77. Farid Hassan	Mag. Education	1977	Mag. Education
78. Haseebullah	Mag. Education	1977	Mag. Education
79. Zafar Ali	Mag. Education	1977	Mag. Education
80. Kamal Rehman	Mag. Education	1977	GMS Education
81. Siraj U Din	Mag. Education	1977	GMS Education

Terminated due to given
 or sub-professional qual-
 documents not provided
 for verification
 Having no DM certificate
 & has not provided DM
 degree for verification
 Having no DM certificate
 & has not provided DM
 degree for verification
 Having no DM
 certificate/diploma
 PPR diploma found false
 & bogus
 PPR diploma found false
 & bogus
 PPR diploma found false
 & bogus
 Having no professional
 documents
 Having no professional
 documents & lower
 Karim's certificate holder
 while she was appointed
 in Central Karim, also
 appointed in TARE while
 the basis of infidelity &
 enquiry

Failed in typing test as
 per advertisement &
 rejected by enquiry
 officers.

77

Agency Education Officer
 Lower & Central Karim Sialkot

- No. 2087/2017 / 2017
- Copy for information to:
1. Director of Education FATA Peshawar.
 2. Political Agent, Karim Agency.
 3. Additional Political Agent, Karim Agency.
 4. Agency Account Officer, Karim Agency.
 5. Assistant Political Agent, Lower Karim.
 6. Assistant Political Agent, Central Karim.
 7. Principals/Headmasters concerned for similar action.

Agency Education Officer
 Lower & Central Karim Sialkot

17	Bibi Sakina	Haji Gul Akbar	CT	9	GGMS tabi Khonikhel	Terminated due to excess in sub divisional quota
18	Samreen Sadaf	Haji Amin Khan	DM	9	GGMS Tarali	Documents not provided for verification
19	Shamin Bibi	Spin Gul	DM	9	GGMS Dogar No2	Having no DM Certificate & has not provide BA degree for verification
20	Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM Certification & has not provide BA Degree for verification
21	Bibi Jamila	Khan	DM	9	GGMS tabi khonikhel	Having no DM certificate / Diploma
22	Sajid Rahman	Haji Haider Khan	PET	9	GMS Dapa	JDPE diploma found fake & bogus
23	Zia ul Alam	Noor Alam	Pet	9	GMS Khazecna	JDPE diploma found fake & bogus
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai	JDPE diploma found fake & bogus
25	Mr. Jehan	PET	9	GMS Kunal Baza	Having no professional documents
26	Zar Taj Bibi	Haji Anmir Khan	Pet	9	GGMS Ossai	Having no professional documents & lower Kurram domicile holder while she was appointed in Central Kurram also appointed ...
27	Sajid Rehman	Said Adam Khan	I/C	7	GHS	Has been expelled by pa enquiry
28	Siraj U Din	Walayat Khan	I/G	7	GHS Manatoo	Failed in typing test as per advertisement & rejected by enquiry officers.

Add. Agency Education Officer
Lower & Central Kurram Sadda.

No 2987-93 /Edu dated 11-12-2015

Copy for information to the: -

1. Director of education FATA Peshawar.
2. Political Agent Kurram Agency.



2

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216

NO. _____
DATED 11/12/2015 E-7-6 MEETING FILE RC

Most Urgent.

14

To
The Additional Agency Education Officer
Lower & Central Kurram Agency

Subject: RELEASING OF PAY /SALARIES OF FRESH APPOINTEES,
APPOINTED DURING 2012-13.

Memo: Please refer to this Directorate Memo.No.1446 dated 13/12/2014, addressed to Agency Accounts Officer Kurram Agency.

Consequent upon the recommendations of oversight committee, constituted by the competent authority, I am directed to inform you to release the salaries of eligible candidates appointed during 2012-13 by your office as per enclosed lists attached duly signed by the oversight committee members and terminate in-eligible candidates as per lists attached with effect from the date of their appointments and if salaries paid to them be recovered from them accordingly.

^{sel}
Deputy Directress (Estab)

Endst.No. 12228-36

Dated 7/12 2015

Copy to;

1. Political Agent Kurram Agency with the request to take action against the candidates as per enclosed lists appointed on fake documents as per rules.
2. Agency Education Officer Kurram Agency.
3. Deputy Director (F/A) local Directorate.
4. Deputy Secretary Law & Order FATA Secretariat.
- ✓ 5. Assistant Director (Litigation) local Directorate.
6. PS to secretary AI&C FATA Secretariat.
7. PS to Secretary SSD FATA.
8. P.A to Director Education, FATA.

Deputy; Directress (Estab)



To
The Political Agent
Kurram Agency

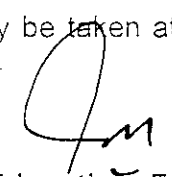
Subject: APPOINTMENT MADE BY MR. MOEEN GUL AEO; AEO
LK/CK.

Memo:

I am directed to refer to your letter No.5733 dated 30-4-2015 on the subject noted above and to state that on the recommendation of oversight Committee, the competent authority is pleased to dispose of instant case as under.

1. Being Appellate authority, the Political Agent concerned may dispose with the services of the ineligible candidate's initiate criminal cases against these appointees on fake documents and recover the salaries from them (list attached).
2. The eligible candidates may be retained and their salaries be released (list attached).

You are therefore requested that action may be taken at your end under intimation to all concerned.


o/c Director Education, FATA

Endst.No. 10119-25
Copy to;

Dated 30/9 2015

1. Agency Education Officer Kurram Agency at Parachinar.
2. Deputy Secretary Law & Order FATA Secretariat.
3. Deputy Director (F&A) local Directorate.
4. PS to Secretary FiFA FATA Secretariat.
5. Additional Agency Education Officer Lower/Central Kurram.
6. PS to Secretary SSD FATA.
7. PA to Director Education, FATA.


o/c Deputy Directress (Estab)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 299 /2016

MUHAMMAD SAEED

VS

EDUCATION DEPTT:

REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Admitted correct the extent of advertisement which was published in the Daily Newspaper advertised various posts while the remaining para is incorrect. That appellant having Domicile of Kurram Agency and the requisite qualification applied for the said post and after participation in the test and interview the appellant was declared successful in the said selection process. That after completion of selection process the appellant was appointed vide appointment order dated 18.01.2013. That in response of the said appointment order the appellant submitted his charge report and started performing his duty at the concerned station quite efficiently and up to the entire satisfaction of his superiors. That no complaint whatsoever has been received during the entire service of the appellant and appellant had regularly performed his duty.
- 2- Admitted correct to the extent of appointment order of the appellant while the remaining Para is incorrect. That after appointment salaries of the appellant withheld by the respondent Department without assigning any reason while the appellant was regularly performing his duty. That at the time of appointment the appellant submitted original educational documents but the respondent No.3 malafidely terminated the appellant.
- 3- Needs no comments.
- 4- Incorrect and misconceived. That the respondent Department inquire/verified the educational documents of the appellant from the concerned Board/University which

were found clear. That inspite of that the respondent Department withheld the salaries of the appellant. That appellant time and again approach the concerned quarter for release of his salaries but no response has been given by the concerned authority. That feeling aggrieved finally the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. 3602-P/2014 for release of his salaries but during the pendency of the said writ petition the Additional Agency Education Officer, Lower and Central Kurram Agency terminated the services of the appellant without conducting regular inquiry in the matter.

- 5- Incorrect and not replied accordingly hence denied.
- 6- Incorrect and not replied accordingly hence denied.
- 7- Need no comments.

GROUND:
(A to D):

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect, baseless and not in accordance with law and Rules hence denied. That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015. That the respondent department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 and the respondent Department had not adopted the codal formalities before issuing the impugned termination order. Moreover as per Supreme Court Judgments regular inquiry is necessary before taking punitive action against the civil servants.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 299 /2016

MUHAMMAD SAEED

VS

EDUCATION DEPTT:

REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Admitted correct the extent of advertisement which was published in the Daily Newspaper advertised various posts while the remaining para is incorrect. That appellant having Domicile of Kurram Agency and the requisite qualification applied for the said post and after participation in the test and interview the appellant was declared successful in the said selection process. That after completion of selection process the appellant was appointed vide appointment order dated 18.01.2013. That in response of the said appointment order the appellant submitted his charge report and started performing his duty at the concerned station quite efficiently and up to the entire satisfaction of his superiors. That no complaint whatsoever has been received during the entire service of the appellant and appellant had regularly performed his duty.
- 2- Admitted correct to the extent of appointment order of the appellant while the remaining Para is incorrect. That after appointment salaries of the appellant withheld by the respondent Department without assigning any reason while the appellant was regularly performing his duty. That at the time of appointment the appellant submitted original educational documents but the respondent No.3 malafidely terminated the appellant.
- 3- Needs no comments.
- 4- Incorrect and misconceived. That the respondent Department inquire/verified the educational documents of the appellant from the concerned Board/University which

were found clear. That inspite of that the respondent Department withheld the salaries of the appellant. That appellant time and again approach the concerned quarter for release of his salaries but no response has been given by the concerned authority. That feeling aggrieved finally the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. 3602-P/2014 for release of his salaries but during the pendency of the said writ petition the Additional Agency Education Officer, Lower and Central Kurram Agency terminated the services of the appellant without conducting regular inquiry in the matter.

- 5- Incorrect and not replied accordingly hence denied.
- 6- Incorrect and not replied accordingly hence denied.
- 7- Need no comments.

GROUND:
(A to D):

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect, baseless and not in accordance with law and Rules hence denied. That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015. That the respondent department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 and the respondent Department had not adopted the codal formalities before issuing the impugned termination order. Moreover as per Supreme Court Judgments regular inquiry is necessary before taking punitive action against the civil servants.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT

THROUGH:



NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 299 /2016

MUHAMMAD SABED

VS

EDUCATION DEPTT:

REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Admitted correct the extent of advertisement which was published in the Daily Newspaper advertised various posts while the remaining para is incorrect. That appellant having Domicile of Kurram Agency and the requisite qualification applied for the said post and after participation in the test and interview the appellant was declared successful in the said selection process. That after completion of selection process the appellant was appointed vide appointment order dated 18.01.2013. That in response of the said appointment order the appellant submitted his charge report and started performing his duty at the concerned station quite efficiently and up to the entire satisfaction of his superiors. That no complaint whatsoever has been received during the entire service of the appellant and appellant had regularly performed his duty.
- 2- Admitted correct to the extent of appointment order of the appellant while the remaining Para is incorrect. That after appointment salaries of the appellant withheld by the respondent Department without assigning any reason while the appellant was regularly performing his duty. That at the time of appointment the appellant submitted original educational documents but the respondent No.3 malafidely terminated the appellant.
- 3- Needs no comments.
- 4- Incorrect and misconceived. That the respondent Department inquire/verified the educational documents of the appellant from the concerned Board/University which

were found clear. That inspite of that the respondent Department withheld the salaries of the appellant. That appellant time and again approach the concerned quarter for release of his salaries but no response has been given by the concerned authority. That feeling aggrieved finally the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. 3602-P/2014 for release of his salaries but during the pendency of the said writ petition the Additional Agency Education Officer, Lower and Central Kurram Agency terminated the services of the appellant without conducting regular inquiry in the matter.

- 5- Incorrect and not replied accordingly hence denied.
- 6- Incorrect and not replied accordingly hence denied.
- 7- Need no comments.

GROUND:
(A to D):

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect, baseless and not in accordance with law and Rules hence denied. That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015. That the respondent department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 and the respondent Department had not adopted the codal formalities before issuing the impugned termination order. Moreover as per Supreme Court Judgments regular inquiry is necessary before taking punitive action against the civil servants.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT

THROUGH:



NOOR MOHAMMAD KHATTAK
ADVOCATE