Service Appeal No. 609/2016

31:07.2018

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

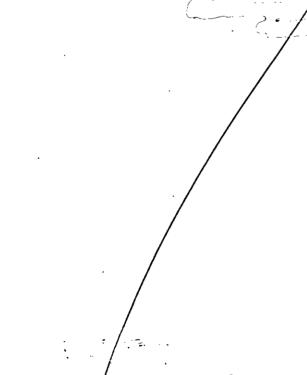
Vide our detailed judgment of today placed in connected Service Appeal No. 603/2013 "titled Mst. Shamia Bibi Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others respondents, the present appeal is accepted, the impugned order is set aside and the appellant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

ANNOUNCED 31.07.2018

(AHMAD HASSAN) MEMBER

(MUHAMMAD HAMID MUGHAL) MEMBER The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come up on 31.07.2018.





2

28.09.2017

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



27.12.2017

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

hairman

27.02.2018

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

Member

12.04.2018

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

Chairmar

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

> (Ahmad Hassan) Member

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

13.07:2017

(Muhammad Amin Khan Kundi) Member

22.12.2016

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

(MUHAMMAD AAMIR NAZIR) MEMBER

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

(ASHFAOUE TA MEMBER

14.03.2017

30.01.2017

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



14.06.2016

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

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

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 23.08.2016 before S.B.

Charman

Chairman

23.08.2016

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

03.11.2016

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

Member

Form- A

FORM OF ORDER SHEET

	S Court (of
	Case	No609/2016
S.No.	Date of order - proceedings	Order or other proceedings with signature of judge or Magistrate
1	· 2	
1.	₲₽	The appeal of Mr. Awal Shah presented today by Mian Asif Amam Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-	3-6-2016	This case is entrusted to S. Bench for preliminary hearing to be put up there on. $\underline{14-6-16}$.
	۹ ۱ ۱	

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 609 of 2016

Mr. AWAL SHAH

<u>VERSUS</u>

Additional Agency Education Officer & others

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1.	Grounds of appeal		1-6
2.	Affidavit		7
3.	Addresses of the parties		8
4.	Copy of the impugned order	"A & B"	9-10
	dated 18-02-2016 and show		
	cause published notice "		
5.	Copy of Departmental appeal	"С"	11-13
6.	Copy of the salary bill	"D"	14
7.	Copies of the applications	"E to H"	15-
1. /	and departmental		18
<u>।</u> স	correspondences.		0'8
8.	Wakalat Nama	•	•

Appellant

Through

MIAN ASIF AMAN Advocate, High Court, Peshawar

Off: T-30, 3rd Floor Biloor Plaza, Peshawar Cantt.

Cell # 0313-9185077.

FORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAW

Service Appeal No. 609 of 2016

Diary No.

AWAL SHAH CLASS <u>IV</u>, EX-CHOUKIDAR GOVERNMENT PRIMARY SCHOOL MIRDO TANG, KURRAM AGENCY.

..... APPELLANT

<u>VERSUS</u>

ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL KURRAM, SADDA, KURRAM AGENCY.

DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT, PESHAWAR.

AGENCY ACCOUNT OFFICER KURRAM AGENCY.

GOVERNMENT OF KHYBER PUKHTOON KHWA, THROUGH SECRETARY EDUCATION, CIVIL SECRETARIAT, PESHAWAR.

..... RESPONDENTS.

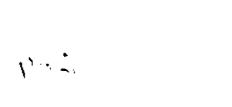
APPEAL AGAINST THE OFFICE ORDER No 3374-78 DATED 18-02-2016 PASSED BY RESPONDENT NO.1 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE DUE TO LONG ABSENCE FROM DUTY.

PRAYER

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

Respectfully Sheweth:

1) That the Appellant Appointed in the year 1999 As Class <u>IV</u>, Choukidar Government primary school Mirdo Tang, Kurram Agency, and since then performed his duties with honesty and full devotion.



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That the Appellant was surprise and consternation came to know about his removal from service impugned order date 18-02-2016 and show cause notice published in daily news paper Mashriq on 02-02-2016, when the Appellant after winter vacation joined his duties. (Copy of the impugned order dated 18-02-2016 and show cause published notice are attached as Annexure "A & B").

3) That feeling aggrieved from the impugned order dated 18-02-2016 the Appellant preferred the departmental appeal. (Copy of 2016 Departmental appeal is enclosed as Annexure "C").

4) That the departmental appeal has not been answered and decided despite the lapse of statutory period of time, therefore, Appellant filed present appeal against the impugned order dated
18-02-2016 of respondent No.1, which is against the law, facts and principles of justice on the following grounds inter-alia:

GROUŇÍ

Α.

В.

С.

D.

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

That exparte action has been taken against the Appellant and they been condemned unheard.

That no charge sheet and show cause notice were issued to the Appellant.

That the Appellant are serving with all Zest and Zeal with the entire satisfaction of his superiors, performed his duties with religious devotion, therefore, never ever absented from his official duties, which further established from the contents of the attendance registered maintained by the High School which presumption of accuracy and truth is extended, it is pertinent to mentioned here that the said registered of attendance not maintained in the primary school, where by the head master checked the attendance of Class IV employees.

That Appellant punctual and regular throughout his duties, and never ever absented from his service, which facts further evident from his pay bill was received Appellant every month, had the Appellant been absentees would the respondent No 1 had prepared his salary bills. (Copy of the salary bill attached as annexure D).

Ε.

F.

G.

That it is important to mention here that during the last few years most of the WATCH MAN/CHOUKIDAR had become unable to perform his duties due to the worse situation in Kurram Agency, the militants factor as well as sectarian factors (Shia & Sunni) also involved. the And in situation the political administration made some decision for improvement law & order situation as per rewaj and custom in the area, which was agreed the Political Agent Kurram Agency and the respondent No 1, whereby when sectarian urgency came in sunni area the shia employee not performed their duties and in shia area the sunni employees not performed their duties until the situation in control, but in these worst situation the Appellant perform his duties as per decided rewaj but the respondent No1, treated the Appellant discriminated.

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

That the malafide and ill will of respondent No 1 was so high peak that he in winter vacation issued show cause notice through publication daily Mashriq and thereafter removal order were also made in winter vacation, whereof Appellant were not in knowledge, this all smacks of retributive intentions and overt malafide on the respondents.

Η.

1.

J.

That as affirm above the winter in Kurram agency is most severe, further more the Appellant leave in scattered far long villages, therefore, Appellant could not get any knowledge of impugned proceeding initiated at the back of ht Appellant malafidely, hence due to explained reason the Appellant could not submits replies of show cause notice.

That ulterior motive of the respondents No 1 self evident from the fact that show cause notices issued through publication against 53 persons but removal impugned order were passed in reference of 17 persons including Appellant, meaning thereby that all those who greased the palms of respondent no 1 were left off the hock, and those who did not obliged him were removed from services just to satisfied personal vendetta of respondent No 1, and more astonished the impugned order dated 18-02-2016 against the facts and ground reality, because one iqbal hussain at serial No 9 impugned order already retired a year ago and received his pension benefit, and not aware the posting of the Appellant. That allegation of the absentee is not corroborated by the official record or any medium of unimpeachable evidence, hence alleged charges baseless and viod liable to be struck down.

Κ.

Ν.

That the Appellant have been condemned unheared in contravention of salutary doctrine of "Audi alterm partum".

M. That no inquiry has been conducted to prove the allegations before awarding the major punishment which this amounts to major deviation from the rules of service laws, hence impugned order is not sustainable in the eye of law.

That before taking such drastic penal action respondent No 1 did not take pain to seek factual input from concerned headmaster/principal who is immediate officer, this all reflects that all the impugned proceedings were made in cursory and slipshod hasty manner without following the rules and regulations showing some personal interest of respondent no 1.

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

P. That any other grounds will be raised at the time of the arguments with prior permission of this Honorable Tribunal. It is, therefore, prayed that On acceptance of this appeal, the impugned Office order No 3374-78 dated 18-02-2016 of Respondent No.1 may kindly be set aside and the Appellant may kindly be ordered to be reinstate in service with all back benefits according to his seniority

Dated 06-06-2016

Appellant

Through

MIAN ASIF AMAN Advocate, High Court, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. ______ of 2016

Mr. AWAL SHAH

AdditionalAgencyEducation Officer & others

AFFIDAVIT

VERSUS

I, AWAL SHAH CLASS <u>IV</u>, EX-CHOUKIDAR GOVERNMENT PRIMARY SCHOOL MIRDO TANG, KURRAM AGENCY, do hereby solemnly affirm and declare on oath that the contents of this Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

DEPÓ



NAIŃ ASIF AMAN

Advocate Peshawar.

ATTE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____ of 2016

Mr. MUZAFFAR DAUD <u>VERSUS</u>

Additional Agency Education Officer & others

Address of the parties

APPELLAN

AWAL SHAH CLASS <u>IV</u>, EX-CHOUKIDAR GOVERNMENT PRIMARY SCHOOL MIRDO TANG, KURRAM AGENCY

RESPONDENTS.

÷۳.

1) ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL KURRAM, SADDA, KURRAM AGENCY.

2) DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT, PESHAWAR.

3) AGENCY ACCOUNT OFFICER KURRAM AGENCY.

Secretary Education, Civil Secretariat, Peshawar.

Dated 06-06-2013

Appellant

Through

MAIN AISF AMAN

Advocate, High Court, Peshawar.

ADD: AGENCY EDUCATION OFFICE SADDA ILURRAM AGENCY

Annewve

PHONE: 0926-520674 FAX 0926520674 NO: <u>3374-78</u>/Edu:

Dated Sadda:the: <u>18/02/2016</u> -

REMOVAL FROM SERVICE.

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

	· · · ·	· · ·	
Note: Entry to this effect s			
S# Name	Desig	School	• :
1 Sadiqn	PET	GGMS Bilyamin	···· · · · · · · · · · · · · · · · · ·
2 Maryam Paroog	C.T	IHC Gogani	
3- Shehnaz	1"1"	GGPS Barari	
i Abida Nawaz	AT	GGMS Tindo	
Farah Deeba	PST	GGPS Bagzai	
Shamia Bibi	PST	GGMS Badama	- j
Irfanullah	PS'f	GPS Hamish Gul Kali	
Latif Shah	PST	GPS Had Mella	
<u>Statial Ausann</u>	i ingir i i	GBS Bilyamin .	
0 Jasim Khan	Peou	GHS Shah Ibrahtin	
1 Samad Hussain 🦉	Ch	GPS Talo Kunj	1
2 Muzafar Dawood	. Ch:	GGPS Muzafar Kot	
3 Sher Muhammad	Ch:	GHS Dógar	
📫 🕴 Fazal Rehman	Behish:	GHS Dogar	
Awal Shah	Ch:	GPS Mirdo Tang	
6 Zainullah	Swp:	GHS Paloseen	
7 - Sulaiman	N/Q	GHS Palóseen	

Add: Agency Education Officer; Lower & Central Kurran, Sadda

Add: Agency Education Officer Lower & Central Kityam Sadda

1

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

1: Director of Education FATA Peshawar.

2. Political Agent Kurram Agency.

3. Agency Account Officer Kurram Agency.

4. Head Masters /Teachers Concerned.

01 2,312,120,2016 (1437) 02,1437 164 الب (1) مدانة CGI.19 (CGI.19) (1) مدانة GOMS'PET الماعن (3) - الدانة IHC'OT الماعن (3) - الدانة IHC'OT بايكن (4) نيرددش GGMS DM بايك (5) نردييا ال CGMS'D كرن في (6) مرم قدرت HC CT كاني (7) مراقات MA في GMC دول داند (6) مايد، اود GGPS'TT () مدر(9) مرب إ: إ: GGPS'TT () مشرك (10) مبادل إن GGPS'TT () (11) برجد کر CPS'TT (12) ایک در CPS'TT (12) بر در (12) مت طرا (13) مداند وفير HiC 'PST الماين (١٠١) شي الماين GGPS' PST وترج مرو (15) مدار بكم GGPS (10) بران (10) في الم GGPS (PST) المراجع (10) المراجع (19) المراجع (19) المراجع (19) المراجع (19) المراجع ي --- GGPS 'PST - ول (20) داده المر PST : PST : (20) او (1 .) كل مديد او GGPS'PST - بر (22) عبر (23) والد (23) والد (23) والد (23) والع (23) ار کل (24) امرال مال GPS'PST الدکل (25) كان الد COPS'PST الدکن ك (20) ي GGPS'PST (20) بارك MS'PST (21) بار (20) لاز مرد (20) يدكيا، SP3 عون (امن) أر مالله وكيار OPS من طليكن (35) على مان برك ارد ۲۰۰۰، على (فَانَ) يَنْجَرُ مَادَدٍ وَلَا مِنْ حَالَى حَبَّرَكَتْ (17) جَرَعَتْ جَدَدَيْد عَلَى وَلَكَرْدَ : 10) فَتَلْ أَ OHSW/C وَدُودَ (30) وَالْبِ تَرْسَوْتِي OMS أَوْلُ (40) وَرَضَتْ عَادَتَكَ (30) وَرَسَتْ عَادَ OMS وَرَدَ الْع لیم مان بردیدار 50 G مدکی فرا (44) بالو دور بیکیدار ۲۹۵ ورکی فیر 2 (ت:) مادر مان بد ار GPS عاد (۱۴) ماسیک براندار GPS شرو (۲۸) عاد ارد ان برازار GPS . رس رفت) سامت بوكيد CPS الغرد مرز (49) سراجه من وكديار CPS من (60) الراش يكيلا GP8 ترود في (51) النابية الدر GGP8 يرود (52) وي الدريم GHS : (53) سليكان المسيرة مرد : GHS بالإكران الإليش المسيرة خالية جرمة عفر إسار بر ، کے کم دن اسکولند، کے ایک رسک میں ملک و اور اور ایک میں ایک کیس آرمن . باس اوجاب كالتى كمه جدده ولدف شما فلواجد وفتر وتروشني مامر دور الدراعه الإصل الجمي المركش آبته دىن با التامت بى ول الأراطها وديوه بماسط عملًا عمر ما يحرى بين كرين عدم عمل كي م ٢٦ (E&D) د 2011 (E&D) د 26 د تاري کارول کار عنول ڭ يېنى: دىكى يە

ATTESTED

offace april محمد المال والمريض الحو المراط America $\frac{1}{2} \frac{1}{2} \frac{1}$ Selecte. " Cindler Gift of Dula - 410 (0" or bi de 3 or 11 18/ 10 2 9 17 12 1 1 mar 2 0 كادومال با بن المساط في الما م عدار ب ی میں ساہد ان جس جس جس کی ان کا ان کا ای دار ان دار ان دار ان کا ان ک میں جس س جس باب فرست میں بنائے ج (Security July on Security) 1000 inc 36, 1, 1 2 in 1 3 1 3 18 3016 - 9, 1 6 6 2 heurone 2 in 100, 2 in war grom Singles Sind i ter Remove personal & June of Strange ای جو مال برای بن دے رس س دورو موں مال جرب فرر مدندن فرم ور ساسی دوسال رای این دسرس (Removed order is attached) 30 www.www.1,1,5,0,6,2,6,08/15 2,6,0 www.www. - وجزيد لي براج الرراج ورابا وقرق الرال صراحر مساس كون جمير ال

ی می جور دار ۲۵ کا کا کا می می ولولی کا کا می ای کا کا می ایک کار ای کار کا کار کا کار کا کار کا کار کا کار کا محصور در در در می کار کا کالی می می کار کا کالی می کا کا کار ایس کا کار کا کار کالی کار کا کار کا کار کا کار کا محصور در در در ایک کار کا کالی می می کار کا کالی می کار کا کالی کار کا کار کا کار کالی کار کا کار کا کار کا کار محصور در در در در ایک کار کا کالی می می کار کالی کار کالی کار کا کالی کار کا کار کالی کار کالی کار کا کالی کار فرص الما 49 مدرس ما على في التريش والمريض والمري المريس في المريس في المريس في المريس في المريس في الم D من موج رو ماس / م اور ام اس كارال ما ان ما دان ما والا م الل الم ال ما الل من موالا م - کور خیلای احساب فرا وران میں ولی جاری ہے وہ وہ 15 اس اور ان کا مارا کے ای ج جراری اس میں میں میں میں میں میں اور ای مارول و ماج ادر سے قدان میں 10 مادر اص میں د خرمان المراج المرابعي عادو و 17 روزس المحسن ، ما عرد المرالي المالي 1 Adustiscant of remispaper attached) O معدد مست مر مان مسال 24 دس مح وق من او 18 زری می ا رميسا بي مس دردان سي ولن امراحا من رجو الي حس سي اس بالي من الرجو میں بی سے مذکورہ میں اور سوط سے ساج ی قت عظیر رہا تھا ہی جن اسی س مع المروم جرام در من موسل من من من مان مان مالی الله تحوس مرت من المرال من الله الله من الله من الله من الله من الروسين المرون الدر العلماران خد رتبوت الدر زم ساط من الله تحوز دما ع (2) من معروم مدر میں این مرحود بال سے مرد میں اور الی مالی میں میں ا والا محف وفي وفي والريس ما كالاي الرام الدولو عم -ت مروج ار دو ولي زمان مرار الان المرابي المرابي المرابي المرابي المرابي المرابي المرابي المرابي الم els, Marg Jan ATTESTE

(3) مى مذكرره مورز من كر كوى مرضى ز ركاما مادران خدم مدر مرد المالى فرم الله المراجين من المراجين المراجين المراجين المرجين المرجين المرجين المرجين المرجين المرجين المرجين المرجين الم المرجين المرجين المراجين المراجين المراجين المراجين المرجين المرجين المرجين المرجين المرجين المرجين المرجين الم Cind and the service in the red out of Jel ald and a stand with a stand with a start محرافي ومعيد الال عادوال عام وقيل عيمي Addition of the the to a start of the the start O Copy to Polite and Agent Kinstan Lence Deepy is Accend Trien Munen typener Siv Dread matter Commend "30" in 17 i'l Juin AT j'joure G TT rit & creien Q per Gup Q PSIOUND & PST WUGGAST BUNGO PST UCG (H) is the a ch inter (Fron i Bor (pst i G) Saxerparij (3) CH dub, (3 Betslati 10 p (9) en 3 ATTESTED N/9 JUCE

Kurram at Ara C	Annexure D(14)
S#: 2	P Sec:001 Month:January 2016 KM1118 -ADDITIONAL AGENCY EDU OFFR
Pers #: 00674761 Buckle:	Min. Of K.A & N.A & S.F.R
Name: Awal Shah CHOWKIDAR CNIC No.2130128645281 GPF Interest Applied	NTN: GPF #: Old #:
02 Active Permanent PAYS AND ALLOWANCES:	KM1118 -
2174-Adhoc Relief Allow-2014 2199-Adhoc Relief Allow @10%	745.00 985.00

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Gross Pay and Allowances 20,738.00 DEDUCTIONS: GPF Balance 18,451.00 Subrc:

Total Deductions

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20,025.00

713.00

•					D.O.B		LFP Quota:			
				01	L.01.197	77	NATIONAL	BANK	OF	PAK
16	Years	07	Months	018	Days		1312-9			

ATTESTED

Pers #: 00674761	Buckle:
Name: Awal Shah	
CHOWKIDAR	
CNIC No.213012864528	01
GPF Interest Applied	
02 Active Pe	ermanent
PAYS AND ALLOWANCES:	
0001-Basic Pay	e e tra
1000-House Rent Allo	owance
1210-Convey Allowand	ce 2005
1300-Medical Allowar	nce .
1516-Dress/ Uniform	Allowance
1528-Unattractive Ar	rea Allow
1567-Washing Allowar	nde
1948-Adhoc Allowance	e 2010@ 50% ·
2148-15% Adhoc Relie	ef All-2013
Gross Pay and Allo	owances
DEDUCTIONS:	· · · ·
A second s	

GPF Balance 18,451.00 Subrc: 3661-E.E.F (Exchange) 3701-Benevolent Fund (Exchange) 3704-Group Insurance (Exchange). 3711-Addl Group Insuranc (Exch)

Total Deductions

713.00

482.ÓO

120.00

58.00

3.00

50.00

20,025.00

P Sec:001 Month: January 2016 KM1118 - ADDITIONAL AGENCY EDU OF

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

KM1118

9,855.00 910.00 1,785.00 1,500.00 100:00 1,574.00 100.00 2,067.00 1,117.00 20,738.00

					D.O.B	, LF
	1			01	1.01.1977	NA
16	Years	07	Months	018	Days	13

FP Quota: ATIONAL BANK OF PAK 312-9

NTN: GPF #: Old #:

T ATT





The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Subject: <u>COMPLAINT/ENQUIRY</u> Memo

То

-

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

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

Endst: No. Market /

1

2`` 3 Copy forwarded to:-

- Addl: AEO, Lower/Central Kurram
- Principal GMHS Sadda, Kurram Agency
- P.A to D.E FATA

DY: DIRECTOR EDUCATION FATA SECRETARIAT PESHAWAR

DY: DIRECTOR EDUCATION FATA SECRETARIAT PESHAWAR

FATA SECRETARIAT

Warsak Road Peshawar

No.

DIRECTORATE OF EDUCATION

d1: 03/03

A-12/Majid Gul 1/& H/M

/10

ATTESTE

جنب ولاشان الديشنل جيف سكرتري فانا درخواست برائے ڈاروائی طلماء کی حال پر رحم کرنا @ America اور مجدكًل SET يحطاف كاروائي كرنا 1 두 جناب والاشان 👘 شائد آئي علم بني : وكاك بجيد گل صده دفتر مين AAEO بوست برخوان را ني يشل AAEO بحق خوا 8 مارين 2015 را يكا تا دار گورنهين حماني سَول بکن نحسینیہ SET نیا کیا ہے۔ ٹیرز ن5/24/2015 تک اُس نے سکول کا شکل تک نہیں دیکھا ہے۔ جو ہمارے بچوں اسا تھ خت ناالسانی اور ظلم ہے۔ مجبد گل یہلے ت عادی ہے۔ بطور ثبوت اس کا سابقہ ریکارڈ پیش کرما جا بتا ہوں۔ (1) 👀 😒 2009 میں ایجو نیشن آفس صدول مجیدگل کا زانسفر GMHS صد و تحسیب SET کیا تمیا تو دوا یونی ہے ما ب رہتا تھا آخر کارین کیس صدومے سلامیں۔ سر 1945/2016 dated فی ایس جانس کے خلاف ڈالزیکڑا یوکیشن فاٹا کو دیالکھا گیا(ایلی تھی ہے) صلح کر المحسب المسلم بعدد دوالی صده دفتر میں آنے کا کوشش کرر ماتھا۔اور گمنام ڈائر ی کرنے کا سارالیتا ا مُریشن آخیر نے ایک بار تجرا سکے خلاف ڈائرکٹر ایجو نیشن فاتا کوالیک تطانیم: NO: 709-11 dated 03/05/2010 کے ذریعہ کاہ کیا۔ (خط بیش سے) مغرب ار ۱۳۵۰ (۲۰) ڈائز کترا بچونیشن افاتان التکے خلاف ڈائز کترا بلمینتر اینڈ سینڈری ایچونیشن خیبر پختون خواد کوا یک خط نمبر NO:11665-66 dated 03/08/2010 - ذريع كاردان أيليح خطاكهما (خط تعمل من) منتزير ق جناب والإشان: مجیدُل کُوالیک بار پیش پیش پناہی حاصل ہوئی کاروانی تو دور کی بات ۔ اس کوالیک بار پھرایڈیشنل AEO مقرر کیا۔ادردد (2) سانوں میں أسر نے اوئرسنٹرل کرم کے تعلیمی ڈھانے کو کروڑوں کے بعوض أتباہ کیا۔ اسا تذ دیو کھروں بینچا کرنفٹی فنونی خواہ پر مجبور کرتا تھا، وہ درہمی گز راجب ایک دنعہ نیمر اس کوھائی سَنول کَمن تبعر لِ سَیاشُ، قو تباش کی باری هانی سَلو**ل کَم**ن کونصیب میں ملی اور رہی سی **کم سر**یاں اورا کہا جائے گا۔ جناب والاشان 👘 👘 به، ق بیجون پر رحم فرما کراس انسان کو KPK میں کسی رئیسل کو دالہ کر کے ذیو بی کا عاد ق بنایا جا 🗈 ى تارىڭ 25/04/2015 العاریفسین مایان بکن ^{قر}رم ایجنسی س نقل تھچ ٿئ خطري لنجي ٿئ ۲) سیکرٹری پوشل سیکرٹری (1) أو الزكشرا يحو كيشن فإيان. (۳) استشنیت پوشیکل ایجنٹ لونزگرم (٣) الإثيكل ايجنت ترم 17 ATTESTED he

بخدمت جناب ايديشنل چيف سيكرتري فا ٹاسيکر تريث

اپیل برائے فراہمی انصاف ادر کمیونی سکولوں کے خواتین ،حضرات ٹیچرز کوئی <u>201</u>3ء سے ریگولر کرنا۔

جناب والا: مستعمل آب کوسلوں ہے۔ کہ 15 سال تمل فاٹا ہنمول کرم ایجنسی کمیونی سکولوں کا قیام عمل میں آیا تھا۔ اس دوران کی بارسکولوں کواوران کے اساتذ دکونتم کر کے پھر بحال کر کے آنکھ مچھولی جاری تقی جن کہ اس پراھتجان کاسلسہ اسلام آباد تک جا پہنچا آخر کارگورز خیبر پختون خوانے اس میں فاٹا سیکر زین کے ذریعے ایک فرمان جاری برای (108/ 108/99)(SSD/CSTR) کہ تب تک تازہ بھرتی پر بابندی ہوگی جب تک کمیونی سکولوں بے تمام اساتذہ در یکورز میں میں فاٹا سیکر زین کہ ذریعے ایک فرمان جاری سب سے پہلوکل پھر تان لوکل کور یکور کیا جار (فاٹا سیکر زینہ خطاص ہے)

جناب والا: سمابقه ایدیشنل AEO مابقی معین گل صاحب نے ایمانداری کر سے تقریباً تمام لوگ اسما قدہ کوریگولز کر دیا۔ جبکه مان لوگ نیلیے کوئی خالی پوسٹ ندر بای تسلی دی که خالی پوسٹ آنے یالے میں اس دوران حابقی معین گل صاحب کا تبادلہ کردیا گیا اوراً سکی جگہ یوگل ایڈیشنل AEO مقرر ہوا پختر ایک ماہ بعد بہت زیادہ PTC پوسٹ ایج کیشن آفس صدہ کوئل گئے۔ جس پر پہلے پر اجلیٹ میچرز کوریگولز کر دیا جبکہ تقریباً 35 پوسٹ بقایارہ گئے ۔ اور کن 2012 مانزی معن گل صاحب کا تبادلہ کردیا گیا اوراً سکی جگہ یوگل ایڈیشنل AEO مقرر ہوا پختر ایک ماہ بعد بہت زیادہ PTC پوسٹ ایج کیشن آفس صدہ کوئل گئے۔ جس پر پہلے پر اجلیٹ میچرز کوریگولز کر دیا جبکہ تقریباً 35 پوسٹ بقایارہ گئے ۔ اور کن PTC اسما قدرہ کا 2012 مانٹر دیوں میں CT پر سٹ پر تعیناتی ہوئی اُن کے سیٹ بھی خالی ہو گئے دور ۲) مہ بعد بھی ضد شہ ہوا کہ خالی پوسٹوں پر غیر قانو نی اور خطیط سے سے تعیناتی شرد کی جہ میں پر کہلے ہم نے بطور خد شہ ایڈیٹن چیف سیکرٹر کی کوئیک خطابھی خلیل ہو گئے دور ۲) مہ بعد ہمیں خد شہ ہوا کہ خالی پوسٹوں پر غیر قانونی اور خطیط ہو ہے سے تعیناتی شرد کی ہے۔ جس کیلیے ہم نے بطور خد شہ ایڈیٹ خل

اب خدشات درست ثابت ہوئے مجمد گل صاحب (فرغون ۔ خلالم) نے اقرباء پر دری ادرظلم کی انتہا کر کے ہماری حق پر ڈاکہ ڈال کرلوگوں ہے کر دڑ دل میں رشوت لیکر ہماراحق چین لیا۔ادرخود کروڑ دن کاما لک بن کرانی گاؤں بکن میں شابانہ طرز مقان تعمیر کیا ہے بیٹے کیلئے بیل میں (۲۰)لا کھ پر قطر یا سعود بیکادیزہ خرید کر بیرون ملک تھیج دیا۔ ہم ابھی تک در بدر نکر کھار بے میں آخر کارہم نے فیصلہ کیا کہ ایک دفعہ چرہم آب صاحب کے سامنے یفر یا در کھنا چاہتے ہیں

(1) كَمْ تَمْسِي مَنْ 2<u>01</u>3 مت ريكو^ر رد ياجات

Ameri

- (2) جمن اوگوں کوغیر قانونی حق دیا ہے ان کو ترمیند ید کر کے ہمارے لئے پوشیں خال کنے جائے
- (3) 👘 خالیم توغیر تنائب سرادیا جائے تا کی مستقبل میں کوئی ادرابیا جرات نہ کر کیکے یصورت مجبوری عدالت کے درداز بے ہرمظلوم کیلئے تھلنے میں

العاريطسين نان لوکل کمیونی سکول شیچرز (۱) مرید زمن 6-17101-344927-4789022-4789022-8724258-17101 (۳) گو برسیما ب-4-2789022-8724258-10 (۳) لبنی نزیز 4-38589301-16201-6629858-20 (۳) نازید خاتون 2-8724258-8724258-10 (۳) حلیر (۷) سیماء (۸) کور فرمید 6-256650-2001-1397459-2001 (۹) نور جهان 2-142032798389-2001 (۹) نوشد انفل (۱۱) داحد نی بی 0-15202-4256650 NIC: 16202-4256650-0 (۹) نور جهان 2-142031984611 (۹۰) نوشد انفل (۱۱) داحد نی بی 0-133917 (۳) راحت جان 4-3259250-1010 (۳) رفعت ناز 2-11101084611 (۹۰) رو بینه 6-7101-0313917 (۵۱) یا سمینه (۱۱) سریز (۱۱) سریز (۱۹) راحت نور (۱۹) راحت نور 2-9000-101084611 (۵۱) اسمینه (۱۱) سریز (۱۹) سریز (۱۹) راحت نور ۲۰۱۵-12001800-0000) (۵۱) اسمینه (۱۹) نور ۲۰۱۵-12001800-0000) (۱۹) نور ۲۰۱۵-12000-00000)

اس درخوست کی کالی مندرجه ذیل کوچیج دی گئی۔ (1) يوليشكل ايجنت كرم (2) ڈائر کٹر ایجو کیشن فاٹا سیکرٹریٹ پشاور

ATTESTED 21

مناب دال اسی مارے عبر منی مار در در او میں آگاہ کی سرائم افتاب دوانی طاف کو بحما کام به طراب کو العمر من ازرده معن اور رم من اس ساق اورلوق Dalp 22 ليزا درمورس کي مالي مروره افس در کل و ترفس 418 21 21 2 20 0 0 0 6 (3)216 (3)2 [(1 / 2)] عمر س من مال تو با می وروانس کی در دوانس ک 20,10,0,0,0,0,0,0 عين لازفن حوى 5-1-2014 in نقل درهور مس بحول مع Sinden NAB cuic Jun 13 از فمرر اردانس ATTESTET

ريسول جمر بويوال لعدالت حناسير وسر اول تندع و مدانسه ولد بر بنام ری : 6/6/2016 موزخه يا غرى سكول مرد م - سير عسى السر دغوكي جرم بإعث تحريراً نكه مقدمه مندرجه عنوان بالاميں این طرف سے داسطے ہیر دی دجواب دہی دکل کا ردائی متعلقہ 🖌 آن مقام <u>المتم عمر الملي ممال رمين (مال (مروسي</u> مقررکر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ، وگا۔ نیز وکیل صاحب کوراضی نامه کرنے دتقر رثالت ہ فیصلہ برحلف دیتے جواب دہی اورا قبال دعو کا اور بعسورت ذكرى كرف اجراءا درصولى چيك درد بيدار عرضى دعوى ادر درخواست برشم كي تصديق ۲۰۰ زرای پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری کیطرفہ یا اپل کی برایدگی ادر منسوخی نیز دائر کرنے اپیل نگرانی دنظر ثانی د پیروی کرنے کا اختیار ہوگا۔از بصورت ضرورت مقدمہ مذکور کے کل پاجز دی کاروائی کے واسطے اوروکیل پامختار قانونی کوایے ہمراہ پاایے بجائے تقرر کا اختیار ہوگا۔اورصاحب مقرر شدہ کوہمی وہی جملہ مذکورہ بااختیارات حاصل ہوں کے اوراس کا ساختہ برداخته منظور قبول بوگاردوران مقدمه میں جوخر چدد مرجانه التوائے مقدمہ کے سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہویا حد ہے باہر ہوتو دکیل صاحب پابند ہوں گے۔ کہ پیروی مرکور کریں۔ لہداو کالت نامہ کھندیا کہ سندر ہے۔ المرتوم ____ ,2018 ______ بتقام المساور کے لئے منظور ہے۔ & Daughter