

ORDER

19.01.2022

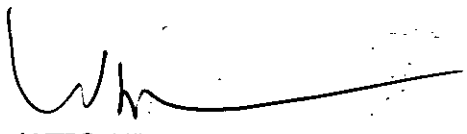
Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakheil, Assistant Advocate General for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, passed in service appeal bearing No. 826/2019 "titled Mst Sadia Bibi Versus Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Civil Secretariat Peshawar and two others", we are inclined to accept the instant service appeal. The impugned orders are set aside and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs, file be consigned to record room.

ANNOUNCED

19.01.2022


(AHMAD SULTAN TARBEN)
CHAIRMAN



(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

14.01.2022

Appellant present through representative.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Due to non-availability of Mr. Mian Muhammad Member (Executive), the case could not be heard. Adjourned. To come up for arguments on 19.01.2022 before D.B.


(Rozina Rehman)
Member (J)

18.10.2021

Junior to counsel for the appellant and Mr. Muhammad Rasheed, DDA for the respondents present:


Due to general strike of the bar, counsel for the appellant is not in attendance today. To come up for arguments on 02.02.2022 before the D.B.


(Salah-ud-Din)
Member(J)


Chairman

14-12-21

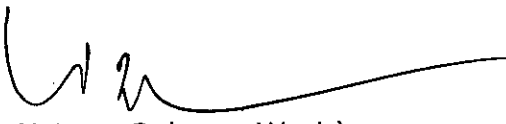
DB is on Tour case to come up
For the same on Dated. 3-1-22


Reader

03.01.2022

Junior to counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Former requests for adjournment due to engagement of learned senior counsel for the appellant before the Honourable High Court today. Request accorded. Case to come up for arguments on 14.01.2022 before the D.B.


(Atiq-ur-Rehman Wazir)
Member(E)

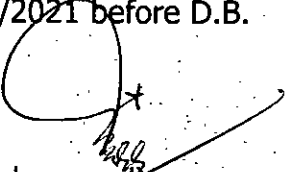

Chairman


12.03.2021

Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General alongwith Roheen ADO (Litigation) and Mehtab Gul Law Officer for respondents present.

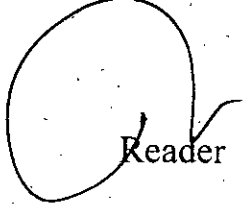
A request for adjournment was made by the learned A.A.G; granted. To come up for arguments on 14/04/2021 before D.B.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

14.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 29.07.2021 for the same as before.


Reader

29.07.2021

Counsel for appellant present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Former made a request for adjournment; granted. To come up for arguments on 18.10.2021 before D.B.


(Rozina Rehman)
Member (J)


Chairman

17.08.2020

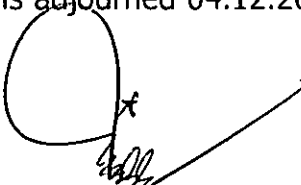
Due to summer vacations, the case is adjourned to 19.10.2020 for the same.


Reader

19.10.2020

Junior to counsel for the appellant and Addl. AG alongwith Abdul Wali, Superintendent for the respondents present.

The Bar is observing general strike today, therefore, the matter is adjourned to 04.12.2020 for hearing before the D.B.


(Mian Muhammad)
Member

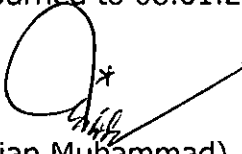

Chairman

04.12.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

Request for adjournment is made due to engagement of learned senior counsel for the appellant before the Honourable Peshawar High Court in various cases today.

Adjourned to 08.01.2021 for hearing before the D.B.


(Mian Muhammad)
Member(E)

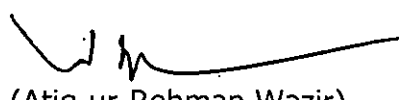

Chairman

08.01.2021

Junior to counsel for the appellant and Asstt. AG alongwith Hamid Saleem, Law Officer for the respondents present.

Former requests for adjournment on account of indisposition of learned senior counsel for the appellant.

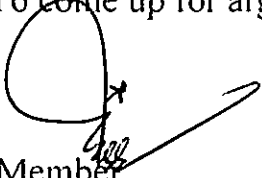
Adjourned to 14.4.2021 for hearing before the D.B.



(Atiq-ur-Rehman Wazir)
Member(E)


Chairman

13.02.2020

Counsel for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Irfanullah, Assistant for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned To come up for arguments on 10.03.2020 before D.B.


Member


Member

10.03.2020

Learned counsel for the appellant present. Mr. Ziaullah learned Deputy District Attorney alongwith M/S Irfan Assistant for respondent No. 1 & 2 and Mr. Iftikhar Bangash Superintendent for respondent No.3 present. Representatives of the respondent department submitted Para-wise comments which is placed ^{on} of file. Copy of the same is handed over to the learned counsel for the appellant. Adjourn. To come up for further proceedings/arguments on 14.05.2020 before D.B.


Member


Member

14.05.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 17.08.2020 before D.B.


Reader

09.10.2019

Counsel for the appellant and Addl. AG alongwith Irfanullah, Assistant for the respondents present.

Representative of respondents seeks further time. Adjourned to 13.11.2019 on which date requisite reply/comments shall positively be submitted.



Chairman

13.11.2019

Mr. Abbas Khan, attorney for the appellant and Addl. AG present. No represent on behalf of the respondents is available.

Fresh notices be issued to the respondents for the next date. Adjourned to 12.12.2019 for submission of requisite written reply/comments by way of last chance.

Learned counsel once again requests for adjournment on the grounds that the bulk of the (Chairman) reconstituted by him.



12.12.2019

Junior to counsel for the appellant present. Asst: AG alongwith Mr. Hayat Khan, AD for respondents present.

The representative of the respondents requests for further time to submit parawise comments on behalf of the respondents despite last opportunity, therefore, the case is posted to DB for arguments on 13.02.2020.



Chairman

30.07.2019

Counsel for the appellant present.

Contends that the appellant was appointed as Assistant District Education Officer (F) on 02.02.2017 whereafter she assumed the charge and started performing her duty as such. On 28.02.2019 the impugned order was issued whereby the appointment order of the appellant was declared null and void ab-initio. In addition, the District Education Officer concerned was required to recover salaries received by the appellant. The contents of the impugned order suggested that the appellant was never associated with the enquiry proceedings, while upon her appointment and performance of duty as ASDEO (F), certain valuable rights were created in her favour as a civil servant. Accordingly, she was to be treated under the applicable rules and was entitled to put forth her defense. The same was denied, it was added.

In view of the available record and arguments of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.09.2019 before S.B.

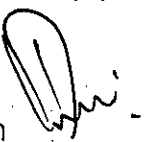
Alongwith the appeal an application for maintenance of status-quo has been submitted. Notice of the application be also given to the respondents for the date fixed.


Chairman


18.09.2019

Junior to counsel for the appellant and Addl. AG alongwith Roheen Naz, ADO and Irfan, Assistant for the respondents present.

Representatives of the respondents requests for time for furnishing the reply/comments of the respondents. Adjourned to 09.10.2019 on which date the requisite reply shall positively be furnished.


Chairman

Appellant Deposited
Security & Process Fee


1/8/19

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 877/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/07/2019	<p>The appeal of Mst. Saira resubmitted today by Mr. Amin-ur-Rehman 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;"><i>[Signature]</i> REGISTRAR 4/7/19</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>31/07/19</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>

The appeal of Mst. Saira d/o Ajmal Khan Ex-ADEO (F) Swabi received today i.e. on 24.06.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of impugned order in respect of appellant mentioned in the memo of appeal is not attached with the appeal which may be placed on it.

No. 1118 /S.T.

Dt. 25/6 /2019.

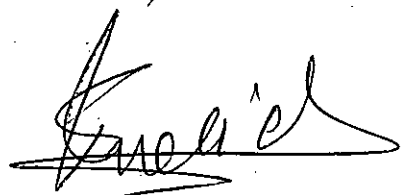

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amin-ur-Rehman Adv. Pesh.

Respected Sir,

Both the petitioners were appointed on the same notification dated on 2/2/2017 but later on

The petitioner co- one Saira's Bibi terminated on the notification dated 28/2/2019 but Saira ^{was} terminated on the ground in the light of the said notification on dated 28/2/2019.

 28/6/19

4/7/18

~~James~~

The name is Benjamin
James test before

The case must be
in page 35 A. P. 13
attached is certificate
dated on 1/3/18
terminated order

Respected Sir,

~~James~~
2/7/18

Returned again to the medical
within 7 days

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

Service Appeal No. 877/2019

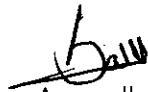
Mst. Saira.....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others.....Respondents

I N D E X

S.No	Description of documents	Annex	Pages
1.	Service Appeal		1-4
2.	Application for Grant of Status Quo alongwith Affidavit		5-6
3.	Addresses of the parties		7
4.	CNIC	"A"	8
5.	Domicile Certificate	"B"	9-10
6.	Educational Testimonials	"C"	11-18
7.	Professional Degrees/Diploma	"D"	19-23
8.	Advertisement dated: 05.03.2015	"E"	24-25
9.	Recommendation dated: 15.12.2016 of KP PSC	"F"	26
10.	Medical Board Letter dated: 26.01.2017 alongwith Medical Certificate dated: 27.01.2017	"G"	27-28
11.	Appointment Notification dated: 02.02.2017 alongwith Charge Report dated: 20.02.2017	"H"	29
12.	Pay Slip of Oct 2018	"I"	30
13.	Office Order dated: 13.02.2017 alongwith Posting/Transfer Notification/Relieving/Charge Report	"J"	31-34
14.	Impugned Notification dated: 28.02.2019	"K"	35
15.	Order dated: 11.04.2019 alongwith Judgment dated: 23.05.2019 (Not yet issued) coupled with Memo of WP No. 2044-P/2019 with ancillary documents	"L"	36-39
16.	Departmental Appeals dated: 01.03.2019	"M"	40
17.	Wakalatnama		41



Appellant

Through

Amin ur Rehman Yusufzai



Sajjad Mehsud

&

Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

Service Appeal No. 877/2019

Mst. Saira D/o Ajmal Khan, Ex-ADEO (F) Swabi R/o Mirzadher, Tehsil Tangi,
District Charsadda. **Appellant**

....VERSUS....

Diary No. 887

Dated 24-6-2019

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt. **Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING
PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:**

NOTIFICATION ENDORSEMENT NO.6712-18/F.NO.A-17/
ASDEOS/SADIA, DATED: 28.02.2019 OF RESPONDENT NO.2,
VIDE WHICH APPOINTMENT NOTIFICATION DATED:
02.02.2017 OF THE APPELLANT WAS DECLARED NULL &
VOID/WITHDRAWN.

PRAYER-IN-APPEAL:

On Acceptance of Instant Appeal, the Impugned Notification dated 28.02.2019 of respondent No.2 alongwith pre and post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, hence be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Filed to-day

Registrar

Respectfully Sheweth:

1. That appellant is law abiding peaceful citizen of Khyber Pakhtunkhwa and permanent resident of Tribal District Mohmand. (Copies of CNIC and Domicile Certificate, are attached as Annexure "A" & "B" respectively)
2. That appellant is qualified upto MA and having passed B.Ed degree course alongwith Diploma in Education. (Copies of Educational Testimonials and Professional Degrees/Diploma, are attached as Annexure "C" & "D", respectively).

That respondent No.3, invited applications for fifteen (15) Vacant Posts of Female ADOs, vide Advertisement No.02/2015, dated: 05.03.2015.

(Copy of Advertisement dated: 05.03.2015, is attached as Annexure "E")

Registrar

4/7/19

4. That appellant, being qualified, applied for one of the aforementioned advertised posts of ADOs and gone through the entire process of selection successfully, eventually she was recommended by the KP PSC to the Govt of KP for the desired appointment vide recommendation dated: 15.12.2016 and was subsequently referred to the Medical Board by respondent No.2, vide office letter dated: 26.01.2017 and was found Medically Fit, evident from Medical Certificate dated: 27.01.2017.
(Copies of Recommendation dated: 15.12.2016 of KP PSC and Medical Board Letter dated: 26.01.2017 alongwith Medical Certificate dated: 27.01.2017, are attached as Annexure "F" & "G", respectively)

5. That appellant, after completion of all codal/legal formalities, was appointed as ADEO/ASDEO (Female) BPS-16, on regular basis, in the Elementary & Secondary Education Department, Khyber Pakhtunkhwa, vide Notification No. 881-85/A-17/ADEO(F)2015-16/Public Service Commission dated: 02.02.2017. Needless to add that after mandatory verification of the testimonials and appointment orders of the appellant, her salary was released, evident from pay slip of October 2018.
(Copy of Appointment Notification dated: 02.02.2017 alongwith Charge Report dated: 20.02.2017, and Pay Slip of Oct 2018, are attached as Annexure "H" & "I", respectively)

6. That appellant was subsequently adjusted against the vacant post of ADEO(F), at the office of the DEO(F) Charsadda, vide office order No.2395-99 Dated: 13.02.2017.
(Copies of Office Order dated: 13.02.2017 alongwith Posting/Transfer Notification/Relieving/Charge Report, is attached as Annexures "J")

7. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however she has unilaterally been shunt-out from service, vide impugned Notification dated: 28.02.2019 of respondent No.2 without due process and following the law/rules governing the subject, It is pertinent to mention herein that NAB and Anticorruption Establishment have simultaneously started harassment of appellant, which resulted into WP No. 2043-P/2019, which was disposed of vide judgment dated: 23.05.2019, and the Hon'ble Division Bench was pleased to declare the simultaneous enquires/investigations ibid as illegal and against the law.
(Copies of Impugned Notification dated: 28.02.2019 and Order dated: 11.04.2019 alongwith Judgment dated: 23.05.2019 (Not yet issued) coupled with Memo of WP No. 2044-P/2019 with ancillary documents, are attached as Annexure "K" & "L", respectively)

8. That appellant preferred departmental appeal dated: 28.02.2019 to respondent No.1 which was received in the office of respondent No.1 vide Diary No. 12341 dated: 01.03.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.
(Copies of Departmental Appeals dated: 01.03.2019, is attached as Annexure "M")

9. That appellant, being aggrieved of impugned notification dated: 28.02.2019 and not considering her departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

GROUNDS:

- A. That impugned Notification dated: 28.02.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor she has been provided equal protection of law, rather she has not been provided fair opportunity to defend herself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.
- C. That neither regular enquiry was conducted into the guilt of the appellant nor she has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterm-partem.
- D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.
- E. That appellant has served the department with zeal, devotion and to the best of her abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

I. 2011 SCMR 1581

“Appointment order found to be bogus/fake/irregular Validity Such charge was vague, nonspecific and did not show any lapse on part of employee or commission of any fraud by him or non-possession of requisite qualification by him or his appointment to be made by an incompetent officer Department had not found performance of employee to be unsatisfactory Impugned order was set aside in circumstances”

II. 2004 SCMR 303

“Appointment of Civil Servants were made by Competent Authority. If prescribed procedure was not followed by the Concerned Authority the Civil Servants could not be blamed for what was to be performed and done by the Competent Authority. Supreme Court noted it with concern that in case the Civil Servants were to be removed then the same would amount to hitting them hard creating problems for the society at large considering each of the Civil Servants being the bread earner of his family. Appointing authorities had been acting mechanically without

application of mind, therefore, the Civil Servant could not be made to suffer for whimsical and mechanical acts of the authorities.”

III. 2016 SCMR 1299

“The solution we have come out is simple, let them continue, if they besides the certificates or diplomas, issued by the council, possesses the requisite or equivalent qualification. Let them all also continue who improve their qualification even thereafter. Those who could not improve their qualification up till now should improve it within a period of one year, which could be reckoned from the date of commencement of the next available academic session of the respective program. ”

IV. 2010 PLD SC 483

“Principle of Audi-alterm-Partem was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, because no adverse action can be taken against a person without providing right of hearing to him”

F. That any other grounds, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 28.02.2019 of respondent No.2 alongwith pre and post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, hence be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Tribunal in circumstances of the case may also be granted.


Appellant
Through

Amin ur Rehman Yusufza


Sajjad Mehsud

&

Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar
Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

VERIFICATION:

Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.




Deponent

5

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

C.M No. ____/2019

In

Service Appeal No. ____/2019

Mst. Saira.....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others.....Respondents

**APPLICATION FOR STATUS-QUO TILL FINAL DECISION OF THE
TITLED SERVICE APPEAL**

Respectfully Sheweths-

1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant applicant.
3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted she will suffer irreparable loss.
4. That applicant has got good prima facie case in her favour and is very much sanguine of its success. Moreover, balance of convenience also lies in her favor.
5. That there is no legal bar to grant the subject permission, rather grant of status quo will prevent the titled appeal from being infructuous.

It is therefore, most humbly prayed that on acceptance of instant application, Status-quo may please be ordered to be maintained till final decision of the titled appeal, so as to secure the ends of justice.

[Handwritten Signature]

Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Mehsud

&

Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

6

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

C.M No. ____/2019

In

Service Appeal No. ____/2019

Mst. Saira.....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others.....Respondents

AFFIDAVIT

I, Mst. Saira D/o Ajmal Khan, Ex-ADEO (F) Swabi R/o Mirzadher, Tehsil Tangi, District Charsaddado hereby solemnly affirm declare on oath that the contents of the accompanying **Petition** are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

Saira

DEPONENT

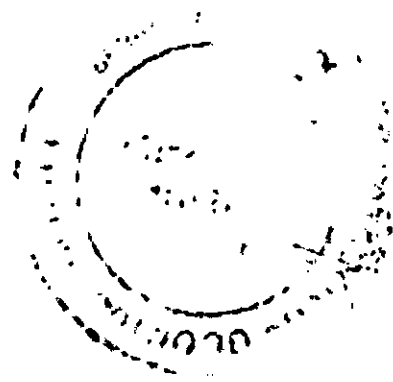
CNIC #: 17102-2583364-6

0312 9092322

Amin-ur-Rehman Yusufzai
Advocate, Peshawar

[Handwritten signature]





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**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

Service Appeal No. ____/2019

Mst. Saira.Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 othersRespondents

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Saira D/o Ajmal Khan, Ex-ADEO (F) Swabi R/o Mirzadher, Tehsil Tangi, District Charsadda

RESPONDENTS:

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt


Appellant
Through

Amin ur Rehman Yusufzai

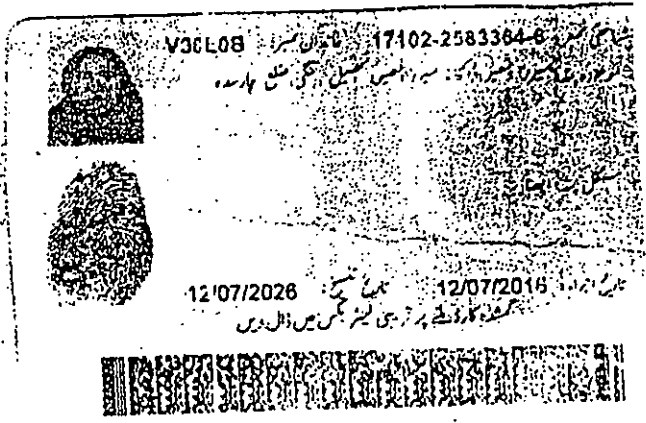
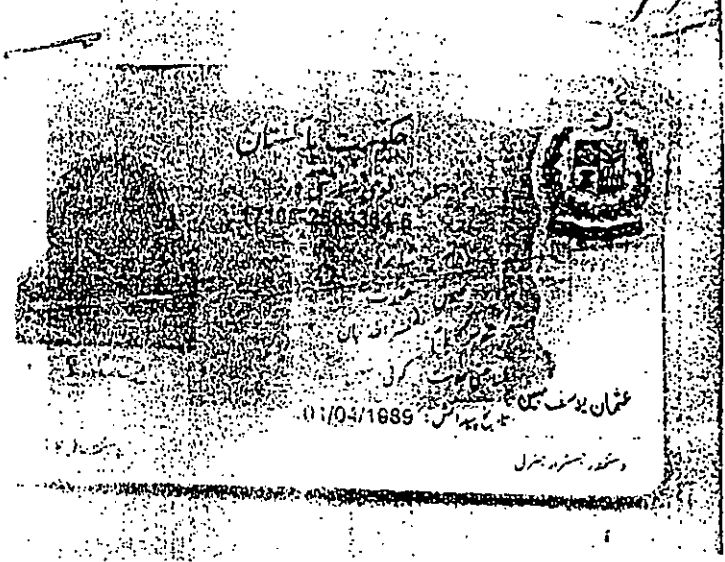

Sajjad Mensud

&

Khalid Khan
Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar
Cell No.0321-9022964, 0333-9981464

Dated: 17.06.2019

ANNEX "A"
8



ATTESTED
ATTESTED



Annex 'B'

(9)

**OFFICE OF THE
POLITICAL AGENT MOHMAND AGENCY
Domicile Certificate**

Certified that Mr./Miss Saisa

Son/Daughter of Ajmal Khan

Belongs to a recognized tribe of Mohmand Agency

section Khawzai Sub section Toto Khel

Residence / Village Garang

and his / her father is a permanent bonafide of the tribal area of Mohmand Agency.
He / She is an eligible candidate to avail himself / herself of the Seats reserved for
FATA Mohmand Agency.

Category M B 4

Political Naib Qansidar
 No. 360 Dated 8/7/2006

Countersigned

Jawara
 Political Agent
 Mohmand Agency

 No. 2624-IEC
7-8-2006
 GHALLAN II

Assistant Political Agent
 Mohmand Agency

No. 479 Dated 7/8/06

ATTESTED

بیت صندان قومیشی

گفتیم که این...
 در این...
 در این...
 در این...
 در این...
 در این...

Amir
 7/6/06

محمد افضل خان صندان

محمد

محمد احمد خان

محمد احمد خان...
 محمد احمد خان...
 محمد احمد خان...

21406-137180-7 21407-19246401 21466-9848809-3 21406-7024290-3

ATTESTED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar Pakistan

This certifies that

Saira daughter of Ajmal Khan

having fulfilled all the requirements is hereby admitted to the degree of

Master of Arts in Islamiyat

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 21st day of January, 2015.

Roll No: 26689

Session: Annual 2014

Reg. No: 2007-FCGT-363



122638

[Handwritten signature]

Registrar

[Handwritten signature]

Vice Chancellor

ATTESTED
ATTESTED

Annex C

11



University of Peshawar

Pakistan

Detailed Marks Certificate

12

Master of Arts in Islamiyat

Final

Annual Examination 2014

District Charsadda



Private

Name: SAIRA

Gender: Female Roll No: 26689

Father's Name: AJMAL KHAN

Registration No: 2007-FCGT-363

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al Quraan Translation 2nd Half & Com with Grammar-VI	100	55	Fifty Five
Principles of Islamic Jurisprudence-VII	100	70	Seventy
Islam & Other World Religions-VIII	100	74	Seventy Four
Islam & Contemporary Muslim World-IX	100	62	Sixty Two
Islam, Modren Thought & Islamic Law of Inheritance-X	100	81	Eighty One
Viva Voce	100	50	Fifty Only
Previous 14475: Annual-2013	500	337	Three Hundred and Thirty Seven
Final	1100	729	Seven Hundred and Twenty Nine

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 13-Aug-2014 to 13-Sep-2014

Result Declared on Wednesday, January 21, 2015

Issue Date: 22-Jan-2015

11:59 am

(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Computerized by RTC

Charsadda City Area

ATTACHED



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar Pakistan

This certifies that

Saira daughter of **Ajmal Khan**

having fulfilled all the requirements is hereby admitted to the degree of

Bachelor of Arts

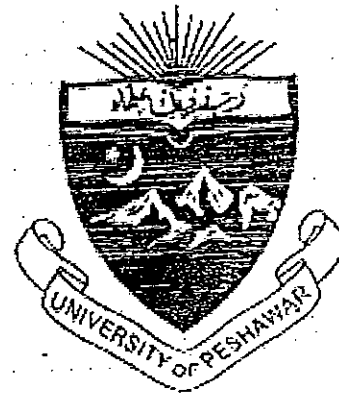
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 30th day of August, 2010.

Roll No: 24268

Session: Annual 2010

Reg. No: 2007-FCGT-363



122648

ATTACHED

Registrar

Vice Chancellor

No. 0009385

University of Peshawar



Pakistan
Detailed Marks Certificate

Bachelor of Arts

Part-II

Annual Examination 2010

F.E.F Girls Degree College Tangi, Charsadda



Name: SAIRA

Gender: Female

Roll No: 24268

Regular

Father's Name: AJMAL KHAN

Registration No: 2007-FCGT-363

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Comp)	75	25	Twenty Five
Islamic Studies	75	58	Fifty Eight
Law	75	38	Thirty Eight
Pakistan Studies	40	30	Thirty Only
Part-I	385	150	One Hundred and Fifty
Part-II	550	301	Three Hundred and One

Errors & omissions are subject to subsequent rectification

Chances Availed: 3

The Examination was taken in Parts

Examination held From 20 May 2010 to 28 Jun 2010

Result Declared on Monday, August 30, 2010

Issue Date: 02 Sep 2010

11:20 am

ATTESTED

Prepared by Computer Cell

(Dr. Mohammad Shah)
ADDITIONAL CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

S.No. 206513

Roll No. 70058

Group. Humanities



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION

SESSION 2007- ANNUAL

This is to Certify that Saira Daughter of Ajmal Khan
and a student of Govt Girls Higher Secondary School Sherpao Charsadda Registered No. 041-B/GHSPC-2005
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2007 as a Regular candidate. She obtained 703 Marks out of 1100 and
has been placed in grade B Representing Very Good. The examination was taken as a whole

Asstt Secretary

Secretary

ACCEPTED
ACCEPTED

This certificate is issued without alteration or erasure.

S.No. PB 151010
(16)

BOARD OF INTERMEDIATE & SECONDARY EDUCATION PESHAWAR

Roll No.: 70058

PESHAWAR

PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2007 HUMANITIES (Part-II)

Saira Son / Daughter of Ajmal Khan

of Govt Girls Higher Secondary School Sherpao Charsadda

has secured the marks shown against each subject in the H S S C Examination held in the month of
May 2007 as a Regular Student

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	44	--	44	--	88	Eighty-Eight
Urdu	200	73	--	69	--	142	One Hundred Forty-Two
Islamic Education	50	42	--	--	--	42	Forty-Two
Pakistan Studies	50	--	--	38	--	38	Thirty-Eight
Civics	200	72	--	67	--	139	One Hundred Thirty-Nine
Islamic Studies	200	64	--	72	--	136	One Hundred Thirty-Six
Health & Physical Education	200	45	10	48	15	118	One Hundred Eighteen
Total : 1100						703-B	Seven Hundred Three Only

Remarks :

Checked By : _____

Date of Issue : 10 August 2007

Controller of Examinations

Note: Errors/Omission accepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

(Computer Cell BISE Peshawar)

ATTESTED
ATTESTED

17

S.No. 426519

Roll No. 81930

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Board of Intermediate and Secondary Education
Peshawar

N.M.H.P. Pakistan

Secondary School Certificate Examination

SESSION 2005- ANNUAL

(Arts Group)

This is to Certify that Saira Daughter of Ajmal Khan
and a student of Govt. Girls Higher Secondary School Sher Pao Charsadda has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March, 2005 as a Regular
candidate. She obtained 661 Marks out of 1050 and has been placed in Grade B Representing Very Good

The Candidate passed in the following subjects:

- | | | | |
|--------------------|----------|---------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. General Science | 6. Maths | 7. Islamic Studies | 8. Pashto |

Date of birth according to admission form April 1, 1989

Asstt Secretary

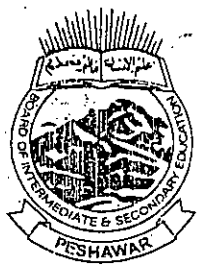
This certificate is issued without alteration or erasure.

Secretary

81933

18

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No 81930
Group HUMANITIES

PESHAWAR PROVISIONAL AND DETAIL MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION SESSION ANNUAL-2005

Saira Son/Daughter of Ajmal Khan
of GOVT. GIRLS HIGHER SECONDARY SCHOOL SHER PAO CHARSAJDA
has secured the marks shown against each subject, in the Secondary School Examination held in the
month of March, 2005 as Regular Student

Subject	Marks	MARKS OBTAINED					
		9Th		10Th		Total	In Words
		Theory	Pract	Theory	Pract		
1. English	150	39	-	34	-	73	Seventy-Three
2. Urdu	150	37	-	47	-	84	Eighty-Four
3. Islamiyat (Comp)	75	48	-	-	-	48	Forty-Eight
4. Pakistan Studies	75	-	-	39	-	39	Thirty-Nine
5. Maths	150	33	-	67	-	100	One Hundred Only
6. General Science	150	41	-	54	-	95	Ninety-Five
7. Islamic Studies	150	58	-	55	-	113	One Hundred Thirteen
8. Pashto	150	53	-	56	-	109	One Hundred Nine


Total 1050

661-B Six Hundred Sixty-One Only

Remarks IS:PA:


Date of Birth: 01st April, 1989

Date 18-06-2005


Controller of Examinations

Note: Error / Omission accepted. Any mistake in above particulars must be intimated within 30 days after receiving the above certificate.

(Computer Cell-BISE, Peshawar)


ATTESTED


ATTESTED

Annex D

19

Allama Iqbal Open University Islamabad



Serial No. 22356

Certified that Mr. / Ms. SAIRA

Son / Daughter of ATMAL KHAN

Registration No: 10NMIN00383 Roll No: 22152098

having completed the prescribed requirements in semester
SPR, 2011 is awarded the degree of:

Bachelor of Education (B.Ed)

He/She has secured 70 % marks and has been placed in A grade.




CONTROLLER OF EXAMINATIONS

Result declared on: MARCH 12, 2012

ISLAMABAD, DATED: JANUARY 25, 2014






Vice-Chancellor

Registrar
M.A. YAR KHAN
S.S. Bhattarai
S.M.S. Bhattarai
Sufan Data Multigrade Agency

This degree is to be read in conjunction with the transcript, issued separately.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No 109835

PROVISIONAL RESULT CARD

Name SAIRA
 Father's Name AJMAL KHAN
 Address VILLAGE MIRZA DHER

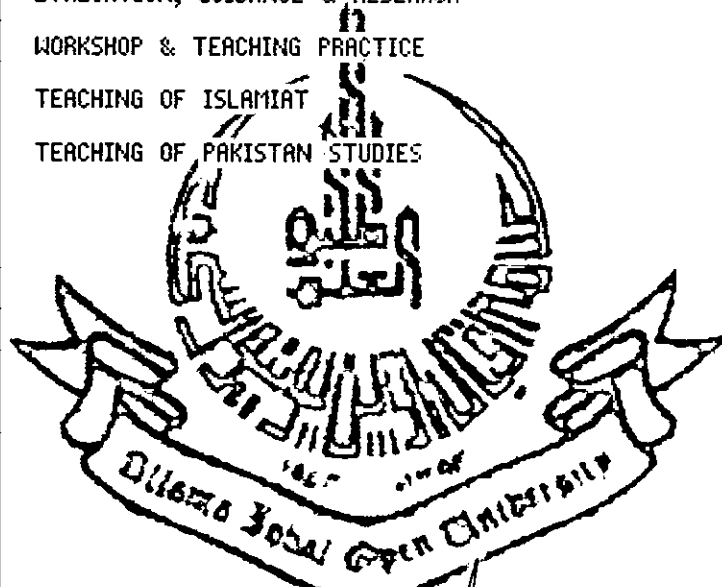
Roll No. 22152098
 Registration No. 10NMN00393
 Final Semester SPR - 2011

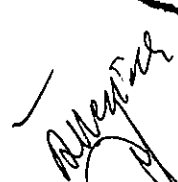
Tehsil TANGI
 District CHARSADDA

has successfully completed BACHELOR OF EDUCATION (B.ED)

The detailed of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 11	0513	SCHOOL ORGANIZATION	100	65
AUT- 11	0651	ENGLISH (COMPULSORY)	100	75
AUT- 11	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	68
AUT- 11	0512	PERSPECTIVES OF EDUCATION	100	62
SPR- 11	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	70
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	60
AUT- 12	0655	WORKSHOP & TEACHING PRACTICE	100	74
AUT- 12	0654	TEACHING OF ISLAMIAT	100	76
SPR- 12	0517	TEACHING OF PAKISTAN STUDIES	100	81




 MALAK FARHAN
 SST (BPS-16)
 G.M.E. Bahadar Kally
 Surat, Lera Mohmand Agency

CREDITS: 6

Total Marks / Obtained 900 / 631

Percentage / Grade 70 A

Result Declared on MARCH 12, 2012

Date of Issue MARCH 22, 2012

Disclaimer:


Controller of Examinations

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.

Adm No: 173

Code No. 14004

(21)

Regional Institute For Teachers Education
(Female) Charsadda

PROVISIONAL CERTIFICATE

This is certify that Miss/Mrs: Saira

Daughter of Ajmal Khan Was a regular student of

this college during the session 20 10 20 11 She appeared in the

Departmental General Examination in Diploma Education (2ND) Certificate

Under the Roll No 873 And Secured 1127 Out of 1500 Marks

With Ist Division.

Result declared on 23-12-2011

1. Date of Birth 01-04-1989
2. Domicile Charsadda
3. Conduct Good


Checked by [Signature]

Prepared by Asmat Ullah

[Signature]
 PRINCIPAL
 R.I.T.E.
 Charsadda

ATTESTED ATTESTED

S.No. _____



DIRECTORATE OF CURRICULUM & TEACHERS EDUCATION, NWFP, ABBOTTABAD
DETAIL MARKS CERTIFICATE
DIPLOMA IN EDUCATION (1st TERM)

NAME: - Saira

SESSION: - 2010.

FATHER'S NAME: - Ajmal, Khan

ROLL NO: - 87:

Subjects: -	Maximum Marks	Marks Obtained		
		Internal	External	Total
1. Child Development & Learning.	100	30	42	72
2. Theory & History of Education.	100	31	35	66
3. Education Technology.	100	36	53	89
4. Teaching of Science/Social Study.	100	37	41	78
5. Teaching of Maths/Islamiyat/Moral Education.	100	33	28	61
6. Teaching of Urdu.	100	37	36	73
7. Teaching Practice.	150	88	53	141
Total Marks: -	750			580

Note: Errors/Omission excepted.

Failed/Passed: - Passed Division: - 1st

Prepared By _____

Checked By _____


Date of Declaration of Result... 31/12/2010

Theory Papers	Internal = 40%
	External = 60%
Teaching Practice	Internal = 60%
	External = 40%

Assistant Director
(Examinations)
N.W.F.P Peshawar

ATTESTED ATTESTED

S.No. 23



DIRECTORATE OF CURRICULUM & TEACHERS EDUCATION, KHYBER PUKHTOON KHWA, ABBOTABAD

DETAIL MARKS CERTIFICATE
DIPLOMA IN EDUCATION (2ND TERM)

NAME: - Saira

SESSION: - 2010-11

FATHER'S NAME: - Ajmal Khan

ROLL NO: - 87

Subjects: -	Maximum Marks	Marks Obtained		
		Internal	External	Total
1. Curriculum and Instructions	100	29	39	68
2. School Organization & Management	100	28	42	70
3. Testing, Evaluation & Basic Research	100	35	43	78
4. Teaching of Computer Science	100	35	31	66
5. Teaching of English	100	22	20	42
6. Teaching of Calligraphy/Art & Craft/Industrial Arts/ Agriculture/Home Economics/Phys. Education.	100	38	43	81
7. Teaching Practice	150	86	56	142
Total 2 nd Term Marks: -	750			547
Total 1 st Term Marks:	750			580
G. Total Marks: -	1500			1127

Note: Errors/Omission excepted.

Failed/Passed: - Passed Division: - 1st

Prepared By [Signature]

Checked By [Signature]

Date of Declaration of Result 23-12-2011

Theory Papers	Internal = 40%
	External = 60%
Teaching Practice	Internal = 60%
	External = 40%

Assistant Director
(Examinations)
K.P.K. Peshawar

ATTESTED ATTESTED

1

ANNEX E¹³

(24)

**KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION**

2- Fort Road Peshawar Cantt:

Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 05.03.2015

ADVERTISEMENT No. 02 / 2015.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **03.04.2015** (candidates applying from abroad by **17.04.2015**). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

AGRICULTURE LIVESTOCK & COOPERATIVE DEPTT:	
1.	<p>TWO (02) POSTS OF FEMALE RESEARCH OFFICER HORTICULTURE FOR (WOMEN QUOTA) IN AGRICULTURE (RESEARCH).</p> <p>QUALIFICATION: 2ND class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p>AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Female. ALLOCATION: Merit.</p>
2.	<p>TWO (02) POSTS OF RESEARCH OFFICER PLANT PATHOLOGY IN AGRICULTURE (RESEARCH).</p> <p>QUALIFICATION: 2ND class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p>AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Merit & Zone-5.</p>
3.	<p>THREE (03) POSTS OF RESEARCH OFFICER FOOD TECHNOLOGY IN AGRICULTURE (RESEARCH).</p> <p>QUALIFICATION: 2ND class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p>AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Merit, Zone-1 & Zone-2.</p>
4.	<p>FOUR (04) POSTS OF RESEARCH OFFICER CHEMISTRY IN AGRICULTURE (RESEARCH).</p> <p>QUALIFICATION: 2ND class M.Sc / B.Sc (Hons) Degree in Agriculture from a recognized University, under research programme in the subject relating to the subject groups as specified in Schedule (Appended to Service Rules) to which the vacancy occurs.</p> <p>AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Merit, Zone-2, Zone-3 & Zone-4.</p>

ATTESTED

25

23.	<p>TWO (02) LEFTOVER POSTS OF DRAFTSMAN IN C&W DEPARMTENT.</p> <p>QUALIFICATION: Secondary School Certificate from a recognized Board and (ii) Two (02) years certificate course in Civil Draftsmanship from a recognized institute/ Board of Technical Education.</p> <p>AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Zone-3 & 5.</p>
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT	
24.	<p>FIVE (05) (LEFTOVER) POSTS OF FEMALE SUBJECT SPECALISTS (PHYSICS) IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.</p> <p>QUALIFICATION: 1. Master's Degree in the relevant subject with Bachelor of Education or M.Ed or Master of Education (Industrial Arts or Business Education) or M.A Education or Equivalent of Qualification from recognized University. OR 2. If no suitable candidate possessing the above qualification is available, a candidate possessing Master's Degree in the relevant subject may be appointed as Subject Specialist to the condition that he/she shall acquire the requisite qualification as specified above within three years from the date of his appointment, failing which his service will be terminated without notice irrespective of any provision of the rules for the time being enforce.</p> <p>Note: - The person appointed as Subject Specialist shall be transferable only to a post relevant to his subject.</p> <p>AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Female. ALLOCATION: Zone-1.</p>
25.	<p>ONE (01) (LEFTOVER) POST OF FEMALE SUBJECT SPECALIST STATISTICS (DISABLE QUOTA).</p> <p>QUALIFICATION: 1. Master's Degree in the relevant subject with Bachelor of Education or M.Ed or Master of Education (Industrial Arts or Business Education) or M.A Education or Equivalent of Qualification from recognized University. OR 2. If no suitable candidate possessing the above qualification is available, a candidate possessing Master's Degree in the relevant subject may be appointed as Subject Specialist to the condition that he/she shall acquire the requisite qualification as specified above within three years from the date of his appointment, failing which his service will be terminated without notice irrespective of any provision of the rules for the time being enforce.</p> <p>Note: - The person appointed as Subject Specialist shall be transferable only to a post relevant to his subject.</p> <p>AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Female. ALLOCATION: Merit.</p>
26.	<p>FIFTEEN (15) (LEFTOVER) POSTS OF FEMALE A.D.O.</p> <p>QUALIFICATION: BA/ B.Sc 2nd Division with B.Ed and Five years teaching/ administrative experience in Govt: recognized education institution/ office.</p> <p>AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Female. ALLOCATION: Zone-1.</p>
ENVIRONMENT DEPARTMENT	
27.	<p>FIVE (05) POSTS OF RANGE OFFICER.</p> <p>QUALIFICATION: B.Sc in Wildlife Management/ Wildlife Ecology/ Wildlife Biology from a recognized university or institute with at least 2nd Division or (ii) B.Sc Forestry from Pakistan Forest Institute Peshawar in 2nd Division or (iii) B.Sc from a</p>

ATTACHED



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

Chief Executive Officer, Government of Khyber Pakhtunkhwa

Office No. 9213503

Phone No. 9211295

Fax No. 9211295

No. KPM/PS/CS/IR-11

Dated: 15/12/2016

ANNEX

96

To

The Secretary to
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education Department

Subject: Recruitment of 15 Female ADO (B-16) in Elementary & Secondary
Education Deptt. Adv.No. 2, 2015 & S.No. 26

Dear Sir,

In continuation to this office letter No. 012399 dated 16.5.2016 and to state that
the commission recommends two candidates in to be Govt. for appointment against the subject
mentioned posts

- (1) Miss Sadia Bibi - Muhammad Aqam Shah
Mohmand Agency
- (2) Miss Saria D/O Aqam Khan
Mohmand Agency

Recommendation in favour of the recommendees are provided subject to the
integrity, honesty and verification of all documents and copies of the same are provided in the earliest
provided in the earliest

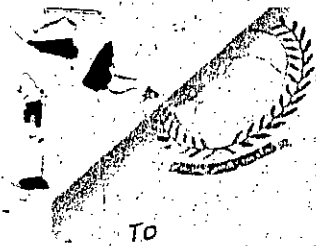
Recommendation of only two (two) candidates have been provided in the enclosure
and deficiencies:

Original application (with enclosure) of the above two candidates are provided with
your record

Kindly acknowledge receipt of the same

ATTESTED

Government of Khyber Pakhtunkhwa



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION

KHYBER PAKHTUNKHWA PESHAWAR

NO. /A-17/ADEO/F/PSC/Apptt:/2015-16

Dated Peshawar the 26/1/2017

ANNEX "B"

(97)

To
The Director General Health
Khyber Pakhtunkhwa Peshawar

SUBJECT:- RECRUITMENT OF 15 FEMALE ADO (B-16) IN ELEMENTARY AND
SECONDARY EDUCATION DEPARTMENT ADVER: NO. 2/2015
AND S.NO.26

Memo:-

I am directed to refer to the subject cited above and to say that the following ADEO (F) candidate resident of Zone-I have been recommended by the Khyber Pakhtunkhwa Public Service Commission (PSC) for appointment as Assistant District Education Officer (F) in B-16 in the Education Department.

S.No	Name with father name	Domicile/Zone
1.	Sadia Bibi D/O Muhammad Akram Shah	Mohmand Agency/1
2	Saira D/O Ajmal Khan	Mohmand Agency/1

It is therefore requested that Medical Board for the above candidates may very kindly be arranged and findings of the Standing Medical Board thereof may be communicated to this office as an early date for further necessary action please.

Deputy Director Establishment(F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. 5203-4

Copy forwarded to the:-

- 1- Section Officer(Primary) Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department w/r to his No.SO(PE)E&SED/3-9/Public Service Commission/2016 dated 28-12-2016.
- 2- Mst.Sadia Bibi D/O Muhammad Akram Shah Mohmand Agency
- 3- Mst.Saira D/O Ajmal Khan Mohmand Agency
- 4- PA to Director E&SE Local Office.

Deputy Director Establishment(F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

/Noor/17/

ATTESTED

MEDICAL CERTIFICATE

98

Name: Saiba D/o Ajmal Khan
 Religion: Muslim
 Residence: Ajmal Khan
Village Mirza Dher Teh Tangi
District Charsadda
 Date of birth: 01.04.1989
 Exact height by measurement: 5'5"
 Personal mark of identification: - NIC -
 Signature of the official: [Signature]
 Signature of head of office: [Signature]

Seal of office S.D.E.O. (F)

I do hereby certify that I have examined Mr. Saiba a candidate
 for employment in the Office of the Educational Deptt
 and cannot discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except NIL

I do not consider this as disqualification for employment in the office of the as above
 His age according to his own statement 28 year and by appearance about
 year fully of eight

[Signature]
 MEDICAL SUPERINTENDENT,
 CIVIL HOSPITAL

[Signature]
 BOARD
 CIVIL HOSPITAL
 LEFT HAND THUMB AND FINGER IMPRESSIONS

[Signature]

ATTESTED

ANNEX 'H'

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@yahoo.com



29
[Handwritten signature]

NOTIFICATION

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of ADEO/ASDEO(Female) BPS-16 (Ra.12910-1035-34960) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Management Cadre on the terms and condition given below with immediate effect and further their services are placed at the disposal of DEO(F) concerned for further posting against vacant ADEO/ASDEO(F) posts:-

S. #	Name	Father Name	Domicile	Zone	Permanent address	Remarks
1	Mst. Sadia Bibi	Muhammad Akram Shah	Mohmand Agency	1	Village Chail Tuzagram P/O und Khawar Tehsil and District Mardan	Service is placed at the disposal of DEO (F) Nowshera for further posting against vacant ADEO/ASDEO posts.
2	Mst. Saira	Ajmal Khan	Mohmand Agency	1	Village Khan Mir Killi P/O Zlam Killi Tehsil Tangi District Charsadda	Service is placed at the disposal of DEO (F) Charsudda for further posting against vacant ADEO/ASDEO posts.

TERMS AND CONDITIONS:-

- 1- Their services will be considered regular under the Khyber Pakhtunkhwa Civil Servant Amendment Act, 2013 and Finance Department Circular No SQSR-III /FD/12-1/2005 dated 27-02-2013.
- 2- Their services are liable to termination on one months notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
- 3- They should join the post within 30 days of the issuance of this notification. In case of failure to join their post within one month of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 4- They should be on probation for a period of one year extendable for another one year.
- 5- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 6- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 7- Charge report should be submitted to all concerned.
- 8- The DEO (F) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of their posting orders.
- 9- The DEO (F) concerned will verify their documents before release of pay.
- 10- Their seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
- 11- No TA/DA etc will be allowed to the appointee for joining their duty.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. 881-875 IA-17/ADEO(F) 2015-16/Public Service Commission Dated Peshawar the 2/1/2017

Copy of the above is forwarded to the:-

- 1- District Education Officer(Female) concerned
- 2- District Account Officer, concerned
- 3- Mistress concerned
- 4- PA to Director (E&SE) Local Office.
- 5- Master file.

[Handwritten signature]
Deputy Director Establishment(F)
(E&SE) Khyber Pakhtunkhwa,
PW

ATTESTED

ATTESTED

Dist. Govt. NWFP-Provincial
District Accounts Office Swabi
Monthly Salary Statement (October-2018)

ANNEX I



30

Personal Information of Mr SAIRA . d/w/s of AJMAL KHAN

Personnel Number: 00843641 CNIC: 1710225833646 NTN:
Date of Birth: 01.04.1989 Entry into Govt. Service: 04.02.2017 Length of Service: 01 Years 08 Months 029 Days

Employment Category: Active Temporary

Designation: SENIOR ENGLISH TEACHER 80004646-DISTRICT GOVERNMENT KHYBE
DDO Code: SU6180-Head Mistress GGHS Parmoli Swabi
Payroll Section: 003 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: Yes GPF Balance: 42,399.00
Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 16 Pay Stage: 0

Wage type	Amount	Wage type	Amount
0001 Basic Pay	18,910.00	1000 House Rent Allowance	2,727.00
1210 Convey Allowance 2005	5,000.00	1947 Medical Allow 15% (16-22)	1,500.00
2211 Adhoc Relief All 2016 10%	1,588.00	2224 Adhoc Relief All 2017 10%	1,891.00
2247 Adhoc Relief All 2018 10%	1,891.00	5011 Adj Conveyance Allowance	7,500.00

Deductions - General

Wage type	Amount	Wage type	Amount
3016 GPF Subscription - Rs3340	-3,340.00	3501 Benevolent Fund	-800.00
3990 Emp.Edu. Fund KPK	-150.00	4004 R. Benefits & Death Comp.	-1,089.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 0.00 Recovered till October-2018: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 41,007.00 Deductions: (Rs.): -5,379.00 Net Pay: (Rs.): 35,628.00

Payee Name: SAIRA
Account Number: 41419505720
Bank Details: NATIONAL BANK OF PAKISTAN, 230410 TEHSIL BAZAR TEHSIL BAZAR,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: S Domicile: - Housing Status: No Official
Temp. Address: City: Email:

ATTESTED

(232428/27.10.2018/12:32:57) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

ANNEX 'J'

31

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

OFFICE ORDER.

In the light of Notification issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Endst: No.881-85/A-17/ADEO (F) 2015-16 Public Service Commission dated 02/02/2017.

Mst: Saira ASDEO (F) B.16 is hereby posted /adjusted against the vacant post at Circle Shakardhand SDEO(F) Charsadda in the best interest of public service with effect from her arrival report i.e 04/02/2017.

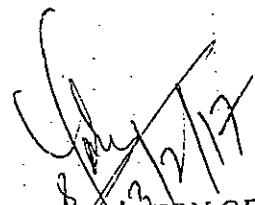
- Note; 1. No TA/DA is allowed.
 2. Charge report should be submitted to all concerned.


(MST; SOFIA TABASSUM)
DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA

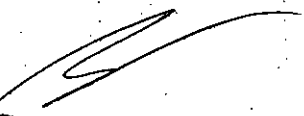
ENDST NO 2395-98 Dated 1/13/2/2017.

Copy for information to the :

1. Director E&SE Khyber Pakhtunkhwa Peshawar w/r his letter No. and dated cited above
2. District Accounts Officer Charsadda.
3. SDEO(F) Charsadda
4. ASDEO(F) Circle Concerned.
5. Office File.


DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA


ATTESTED


ATTESTED

32



**DIRECTORATE OF ELEMENARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

Mst. Saira SST(G) B-16 GGHS Parmoli District Swabi, is hereby transferred on her own pay and BPS to GGCMS, Sultanat Killy Takht Bhai District Mardan, in the interest of public service against the vacant SST (General) post in relaxation of ban.

Note:-

- 1- Charge report should be submitted to all concerned.
- 2- No TA/DA is allowed.
- 3- The District Education Officer (F) Mardan is directed to check her original service documents before making payment of salary.

**Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar**

Endst.No. 10345-49A-17/SST/F/Posting Transfer/

Dated Peshawar the 30/11 2018

Copy of the above is forwarded to the:-

- 1- District Education Officer(Female) Swabi and Mardan
- 2- District Accounts Officer, Swabi and Mardan
- 3- Principals/Headmistress concerned
- 4- Teacher concerned
- 5- PA to Director (E&SE) Local Office.
- 6- Master file.


Deputy Director Establishment(F)
(E&SE) Khyber Pakhtunkhwa,

ATTESTED

Office of the Sub-Divisional Education Officer Female
Charsadda

176 Dated 03/4/2018



RELIEVING SLIP

Mst. Saira ASDEO (F) Circle Toora Panra District Charsadda has been transferred to Govt Girls High School Parmoli District Swabi against the vacant post of SST (G) vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification No. 204/6 /A-17/SST/F/Transfer-Cases Dated Peshawar the 02-04-2018.

You are hereby relieved from your duties today on 03-04-2018 (Afternoon) and directed to report to the Govt Girls High School Parmoli District Swabi for duty.

SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) CHARADDAA

ATTESTED

ATTESTED

[Handwritten signature]

STATEMENT

[Handwritten signature]

2/2/2018

2/2/2018

W.P. No. 10345-48 of 2018

State of Karnataka vs. G.G.C.M.S. Sultanat Killy

10345-48 of 2018

2/2/2018

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

NOTIFICATION

- 1- WHEREAS, One Mst. Sadia Bibi D/O Muhammad Akram Shah domiciled Mohamand Agency resident of Village Chail P/O Lund Khwar Tehsil & District Mardan who was adjusted as ASDEO (Female) in District Nowshera Notification vide No.881 85/A-17/ADEO(F)2014-16/Public Service Commission dated 02/02/2017 upon the production of fake & bogus recommendation letter of the Khyber Pakhtunkhwa Public Service Commission
- 2- AND WHEREAS, the competent authority had directed the above said accused ASDEO to produce authentic/verified service record from the concerned authorities but she failed to comply with the legitimate directions of high-up's regarding production of requisite authentic documents.
- 3- AND WHEREAS, further an inquiry committee was constituted by the competent authority vide No.6979-82 dated 25-01-2019 who have gone through the entire case record and it has been proved that the said recommendation letter of the Commission for the afore said post of ADEO (F) advertised vide Public Service Commission Khyber Pakhtunkhwa Peshawar advertisement No.2/2015 Sr. 26 was turned out fake & bogus.
- 4- AND WHEREAS, it has come into the notice of the competent authority that Mst. Sadia Bibi D/O Muhammad Akram Shah having no legal status of the said appointment order as well as the recommendation letter of Public Service Commission which has been proved fake & bogus vide Public Service Commission Khyber Pakhtunkhwa Peshawar letter NO.PSC-/IX 003780 dated 20/02/2019.
- 5- NOW THEREFORE, under the mandatory provisions and power conferred under the section 20 & 21 of General Clauses Act 1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in respect of above mentioned ADEOs/ASDEOs which was found fake/bogus, their appointment /adjustment Notification No. 881-85 dated 02-02-2017 is declared as null & void ab initio and here by withdrawn with the direction to the District Education Officer concerned to recover salaries and other allied benefits drawn by Mst. Sadia Bibi D/O Muhammad Akram Shah in the interest of Public Service.

6712-18

Endst: No. _____/F.No.A-17/ASDEOs/Sadia

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar
Dated Peshawar the 28/2/2019.

Copy forwarded with the request to take legal action and recover the outstanding amount from the accused to the :-

1. Accountant General, Khyber Pakhtunkhwa Peshawar with the request to direct the DAOs concerned for appropriate action.
2. Director Anti Corruption, Hayat Abad Khyber Pakhtunkhwa Peshawar.
3. Assistant Director Anti Corruption, District Nowshera.
4. District Education Officer (Female) concerned with the direction to take necessary steps for the recovery of outstanding amount against the fake & bogus accused ASDEO (Female) concerned.
5. District Accounts officer concerned with the request to cooperate in the matter.
6. Section Officer (S/F) E&SED, Khyber Pakhtunkhwa.
7. P.S to sectary E&SED, Khyber Pakhtunkhwa.
8. PA to Director E&SED, Khyber Pakhtunkhwa

Deputy Director (F/Estab)

ATTESTED

35A



DISTRICT EDUCATION OFFICE FEMALE CHARASADDA
Contact No. 0916514623 / Email address emfscd@edofa.gov.pk

No. 133-25

The Sub Divisional Education Officer
Female Charasadda

Subject: **NOTIFICATION OF WITHDRAWAL OF ASDEO (F) ORDER IN R/O
MST SAIRA ASDEO (F) CIRCLE TORA PANRA**

Reference:

Enclose please find herewith Notification of withdrawal in R/O MST Saira ASDEO (F) Circle Tora Panra issued by the Director of Education Khyber Pakhtun Khwa Peshtawar vide his No. 3494-95/17 ASDEO dated 12/11/2015.

You are further directed to take over charge of another ASDEO(F) of your subdivision and do the needful.

(Copy may be stopped immediately)

DIS

EDUCATION OFFICER
FEMALE CHARASADDA

Encl. No. 133-25-25
Copy of the above is forwarded for information

- 1. Director, ESSED Khyber Pakhtun Khwa Peshtawar
- 2. MST Saira (F) ASDEO (F) Circle Tora Panra
- 3. DMO (F&M) Charasadda
- 4. Office file.

DISTRICT EDUCATION OFFICER
FEMALE CHARASADDA



Handwritten notes and signatures at the bottom of the page.

ANNEX ^uL^s
36

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET



Date of Order of Proceedings	Order of other Proceedings with Signature of Judge.
1	2
11.04.2019	<p><u>WP No.2044-P of 2019.</u></p> <p>Present: Clerk of counsel for the petitioner.</p> <p>*****</p> <p>The facts of the case reveals that the matter of appointment exclusively pertains to the Public Service Commission, therefore, in view of Order 1 Rule 10 of CPC, the Khyber Pakhtunkhwa Public Service Commission being necessary part, is impleaded in the panel of respondents as respondent No.4. All the respondents shall submit their comments positively within a fortnight.</p> <p>Adjourned.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;"> JUDGE</p>

ATTESTED

DB-Hon'ble Mr. Justice Ikramullah Khan & Hon'ble Mr. Justice Ijaz Anwar

Himayat

37

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR.

Writ Petition No. _____/2019
Alongwith Interim Relief

Mst. Saira D/o Ajmal Khan, ADEO (F) Swabi R/o Mirzadher, Tehsil Tangi,
District Charsadda.

..... PETITIONER

....VERSUS....

1. National Accountability Bureau (NAB) through its Chairman, NAB Head Quarters, Ataturk Avenue, Islamabad.
2. Director General, National Accountability Bureau (KP), PDA Buildings, Phase-V, Hayatabad, Peshawar.
3. Director Anti-Corruption, Khyber Pakhtunkhwa, Phase-V, Hayatabad PeshawarRESPONDENTS

4- KP PSC

=====

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

=====

Respectfully Sheweth:

1. That petitioner, being eligible, was appointed as ADEO/ASDEO (Female) BPS-16, on regular basis, in the Elementary & Secondary Education Department, Khyber Pakhtunkhwa, on the recommendation of Khyber Pakhtunkhwa Public Service Commission, vide Notification No. 881-85/A-17/ADEO(F)2015-16/Public Service Commission dated: 02.02.2017.
(Copies of CNIC alongwith Domicile Certificate, Educational testimonials and Notification dated: 02.02.2017 alongwith Medical Certificate, are attached as Annexure "A", "B" & "C", respectively)
2. That petitioner was subsequently adjusted against the vacant post of ADEO(F), at the office of the DEO-(F) Charsadda, vide office order No.2395-99 Dated: 13.02.2017. Needless to add that appointment order of the petitioner was verified on 25.01.2018.
(Copy of office order dated: 13.02.2017 and Verification of appointment order 25.01.2018, are attached as Annexure "D" & "E", respectively)
3. That NAB-KP authorized inquiry against officers/officials of Directorate of Elementary & Secondary Education of Khyber Pakhtunkhwa & others regarding misappropriation of funds and illegal appointments in various cadres, including appointment Notification of the petitioner, evident from NAB Callup Notice dated: 28.09.2018.

TESTED



**GOVERNMENT OF PAKISTAN
NATIONAL ACCOUNTABILITY BUREAU
BLOCK-III, PDA COMPLEX, PHASE-V HAYATABAD
PESHAWAR**

38
[Handwritten marks]

No.1/703/IW-III/NAB(KPk)/(123195)/853
28 Sep 2018

To District Education Officer (Female),
Charsadda.

Subject: Provision of information / record u/s 19 of NAO, 1999 - Inquiry against Officers / Officials of Directorate of Elementary & Secondary Education KP and Others regarding misappropriation of funds & illegal appointments in various cadres (123195).

National Accountability Bureau Khyber Pakhtunkhwa Peshawar is conducting the subject inquiry under the provisions of National Accountability Ordinance 1999. The documents/ information useful or relevant to the inquiry are in your control or you are acquainted with facts and circumstances of the case.

2. Therefore, you are requested to provide the under mentioned record / information to Mr. Naeem Ullah, Investigation Officer of this Bureau for examination by 08-10-2018.

3. Further it is advised to ensure accuracy of the submitted information. Concealment of facts will attract penalties under the provisions of NAO 1999.



[Handwritten Signature]

Deputy Director(Coord)
For Director IW-II
(Sadiq Ullah Jan)
Ph - 091-9217515
Fax - 091-9217567

List of Record /Documents Required (Duly Attested)

Please provide Service Books and Appointment Orders of the following ADEO's and also direct them to appear before the undersigned on 08-10-2018.

S#	Name	Designation
1	Saira	ASDEO (F) Charsadda

ATTESTED ATTESTED

خلو حلالہ

تھانہ ACE
CHD

(39)

ACE تھانہ PPe 218-409-418-419-420
چارندہ

قدیمہ حوض 29¹⁰/₀₁₇

468-471-474-477A S(2)
PeACT

066-5ACE-044

18-10-017

پر خلاف افراد و ایجنٹان حکم ادا کو کرتی

بائٹہ ASDEO تھی سرکل ٹورہ پانڈ
X=====X=====X

لیکار سرکار تحریر ہے کہ حسب ہدایت CE سرکل چارندہ حوض منور ان مالا میں
سلسلہ تسمیہ اور حوض کر کے ہدایت کی جانی ہے کہ آپ اپنے سروس ریکارڈ تسمیہ
ارڈر ڈیفرارڈر LPe ڈومین سروس تک جاریہ ڈیورٹ وغیرہ پورا کر لیں
تھانہ ACE چارندہ واقعہ DHO ہینال چارندہ حوض 29¹⁰/₀₁₇ ایس وقت 11:30
پس اس کے عدم تھیل کی ضرورت ہے قانونی کارروائی عمل میں لائی جائے گی

3
MHe-ACE-CHD
18-10-017

ATTESTED

گورنمنٹ سیکرٹریٹ، لاہور 245 ایجوکیشن ڈیپارٹمنٹ، لاہور

دو اسٹوڈنٹس کے بارے میں

کا احوال

ASDEO of SA
D. No 12346
Dated .../3/19...

گزارش یہ ہے کہ اسٹوڈنٹس کے بارے میں

میں کیسٹ ASDEO نام کر رہی تھی۔ جس کے اسٹوڈنٹس

پروویڈڈ گورنمنٹ ڈیپارٹمنٹ کے تحت 14PK 881-85 تاریخ 2/17

محل سے ہٹا دی گئی۔ اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں withdraw

کیا گیا۔ اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں

میں کیسٹ پر رہی تھی۔ باقاعدہ اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں

اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں

میں کیسٹ میں اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں

کا۔ ولانا اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں

اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں

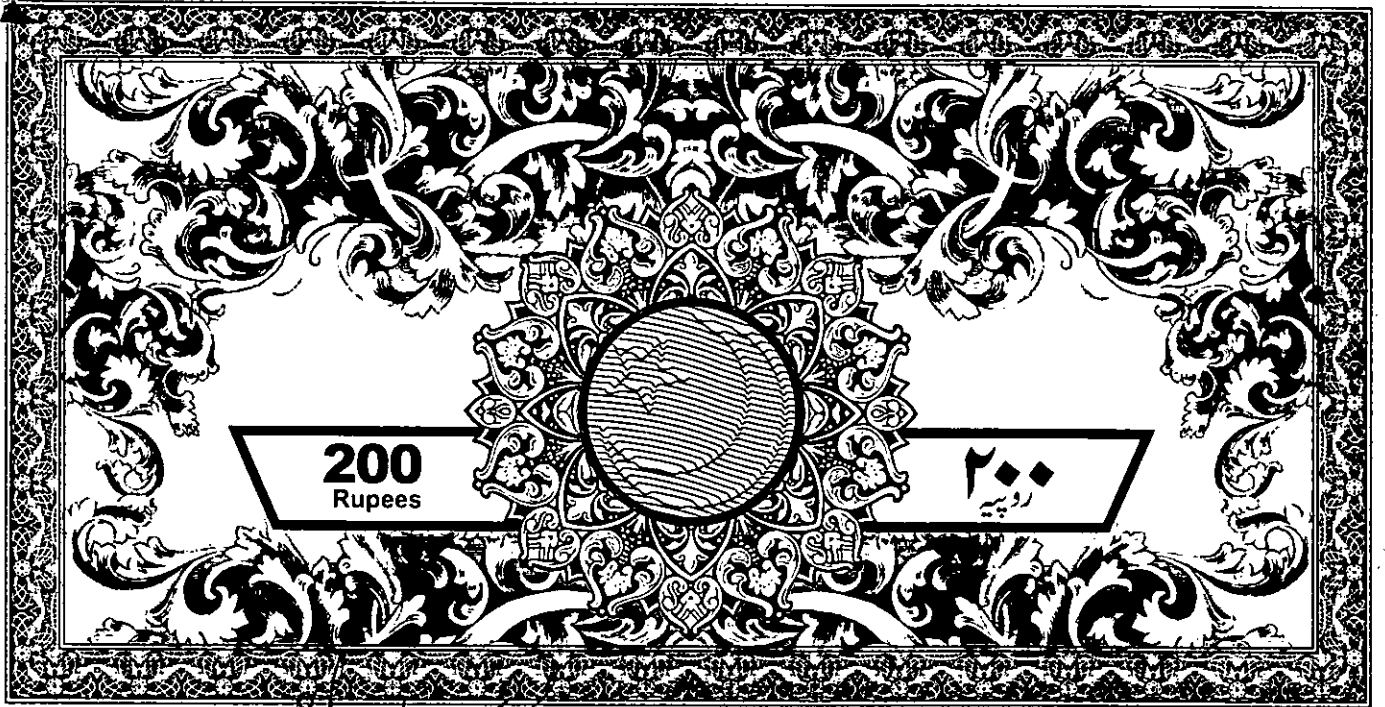
کو رہی اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں اسٹوڈنٹس کے بارے میں

28/02/2019

EX ASDEO

گورنمنٹ

ATTESTED



200 Rupees

۲۰۰ روپیہ

بعدالت جناب عدالت

دعویٰ
 مایانکہ لہنگہ سائرہ زہرا لیسر اللہ خان دستاویز اہل خانہ
 سسرانہ سسرانہ سسرانہ
 تحصیل شہی • ضلع چارسدہ • کا کہ ہوں۔ اندر وقت اقرار
 کر کے لکھ دیتا دیتے ہیں۔ کہ مقدمہ عنوان بالا عدالت حضور میں زید تجویز ہیں۔ اور من مقرر اہم مقرران
 بوجہ دیگر مصروفیات ابوجہ زمانہ ذات پردنشی مقدمہ بالہ کی پیروی کرنے سے قاصر ہیں۔ لہذا من مقرر اہم
 مقرران نے اپنی جانب مقدمہ بالہ کی پیروی کیلئے مسمیٰ میاں خان ولد اہل خانہ
 ساکن خان پورہ تحصیل شہی ضلع چارسدہ مسمیٰ
 ولد ساکن تحصیل تنگی
 ضلع کو مختیار خاص مقرر کر کے اختیارات دینا دیتے ہیں۔ کہ مختیار خاص مذکور من مقرر
 لہم مقرران کا کہ جانب سے دعویٰ ہذا دائر کرے۔ اور مقدمہ ہذا کی پیروی کیلئے کسی وکیل، بیرسٹر یا دیگر
 قانونی شہدہ کو مقرر کرے۔ ہر قسم درخواست، جواب درخواست، جواب الجواب، درخواست ترمیمی
 تصدیق شدہ بیان خلفی عرض دعویٰ، جواب دعویٰ ترمیمی عرض دعویٰ، جواب دعویٰ فہرست
 دستاویزات فہرست وارثان فہرست گواہان اور ہر قسم کے بیانات زبانی اور تحریری طور پر داخل عدالت
 ہذا کرے۔ عدروی میں پیروی کرے۔ ہر قسم کے شہادت دیدے دیگر شہادت پیش کرے۔ اہل کمشین مقرر کرے،
 اسکے ساتھ مقدمہ پر ہر قسم کے کاروائی کرے۔ اجراء کے مدخلہ میں ہر قسم کے کاروائی کرے۔ بصورت دیگر
 فیصلہ ہونے اپیل نگرانی یا نظر ثانی عدالت ڈسٹرکٹ جج صاحب عالیہ سپریم کورٹ آب پاکستان میں دائر
 کر کے پیروی کرے۔ درخواست منسوخی کاروائی ڈگری کیطرفہ دینے، سرسزی کرائے، خرچہ خوار کہ برائے
 طلبیدہ گواہان جمع کرے، دیگر رقومات جمع کرے فریق مخالف ساتھ راضی نامہ کرے۔ دستاویزی مقدمہ ہذا
 کرے، درخواست برآمدگی مثلاً جات دینے۔ دیگر ضروری کاروائی بھی مقدمہ ہذا میں عمل میں ہم مقرران
 کو قابل قبول ہونگے۔ لہذا مختیار نامہ حاص رو برو گواہان سنداً تحریر ہے۔

میاں خان

سائرہ

17102-7087792-9

17102-2583364-6



Signature of Plaintiff

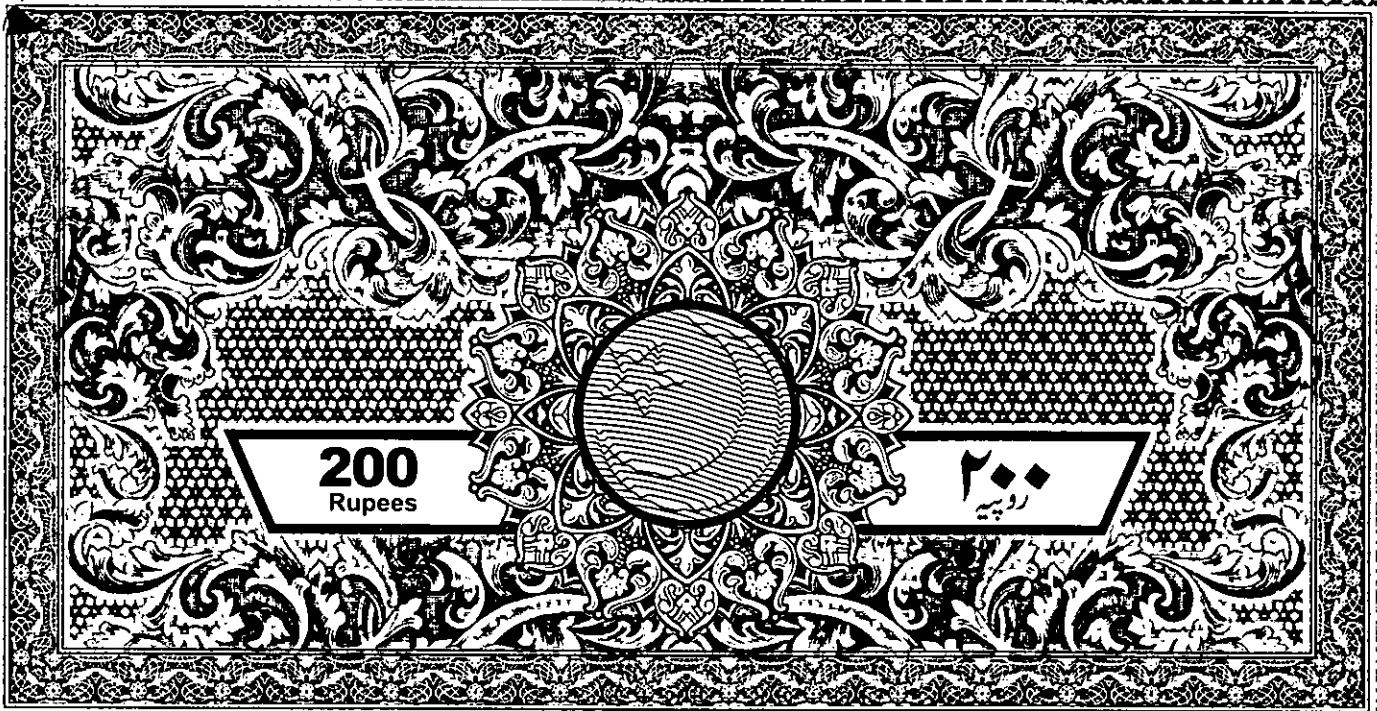
Signature of Defendant

ATTESTED
 Qasim Al-Advocate
 Tangi Charsadda
 Notary Public

No. _____
 Date 27/01/19

کے 24 9 11 7 8 9 17102-1178924-5
 اصل نامہ نظر سسرانہ خان سائرہ زہرا لیسر اللہ خان

734325



200
Rupees

۲۰۰
روپے

[Handwritten signature]

ATTESTED

21 / 6 / 9
[Handwritten signature]

وکالت نامہ

بعدالت حضرت منظور سروس ٹریڈ سوسائٹی

صاحب سائرس نام حکومت وکٹریٹ

منجانب ریپرائزنٹ دعویٰ اجرم سروس ٹریڈ

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیروی وجود ہادی بمقام

امین الرحمن یوسفزئی ایڈوکیٹ ہائی کورٹ، فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈوکیٹ ہائی کورٹ،

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد تالی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از اجراء، ڈگری بھی موصوف کو بشرط ادا ایگی علیحدہ مختار نامہ بیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرونی کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند رہے مورخہ

ATTESTED & ACCEPTED:

Amin ur Rehman Yousafzai Advocate High Court, & Federal Shariat Court of Pakistan.

[Signature]

Sajjad Ahmad Mehsud Advocate High Court Peshawar

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 877/2019

Mst: Saira Ex; ASDEO (F) District Charsadda.

...Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.

.....Respondents

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Asstt: Director (Lit: II)
E&SE Department, Khyber
Pakhtunkhwa, Peshawar.

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 877/2019

Mst: Saira Ex; ASDEO (F) District Charsadda.....Appellant.

VERSUS

**Secretary (E&SE) Department, Khyber Pakhtunkhwa &
others.....Respondents**

PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No:1-12.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief she has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 9 That the instant Service Appeal is not maintainable in its present form.
- 10 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.

- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 28/02/2019 of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.
- 14 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 28/02/2019, hence got finality against the appellant.
- 15 That the recommendation letter of the appellant of has been declared as fake and bogus by the KPK PSC.
- 16 That the Notification dated 02/02/2017 has correctly been disowned by the Respondent Department vide the impugned Notification dated 28/02/2019 by the Respondent No.2 under the rules.

ON FACTS.

- 1 That Para-1 needs no comments.
- 2 That Para-2 is also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct to the extent that the respondent department has invited applications for the appointment against the ASDEO (F) B-16 post vide advertisement No.02/2015 on dated 5/3/2015 in the daily newspapers through the KPK PSC from the eligible candidates wherein, the appellant did not apply for the said post nor appeared in the interview before the respondent No.3 for the appointment against ASDEO (F) B-16 post
- 4 That Para-4 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of her stand regarding filling of an application for the appointment against the ASDEO (F) B-16 post to the Respondent No.3/KPPSC, nor she has been appeared in written test & interview neither appellant has been recommended by the KPPSC against the said post vide recommendation letter dated 15/12/2016 issued by the Respondent No.3. Therefore the claim of the appellant regarding appearing before the medical board & declaring her medically fit vide letter & certificate dated 26/01/2017 & 27/01/2017 make no legal ground & even based on mala fide intensions on the part of the appellant (**Copies of the fake & bogus letter dated 15/12/2016, 26/01/2017 & 27/01/2017 are annexed as Annexure-A, B, C).**
- 5 That Para-5 is incorrect & denied on the grounds that the appellant has not been appointed by the Respondent Department against the ASDEO (F) B-16 post in District Charsadda vide Notification dated 2/02/2017 nor she has resumed her duty on 20/02/2017 against the said post in District Charsadda,

hence the plea of the appellant is illegal & liable to be dismissed. (Copies of the fake & bogus letter dated 2/02/2017 are annexed as Annexure-D, E,).

- 6 That Para-6 is also incorrect & misleading on the grounds that the recommendation letter of the appellant has been declared fake and bogus by the Respondent No.3, hence, the claim of the appellant is illegal and liable to be rejected to the extent of letter 13/02/2017. (Copy of the fake & bogus letter dated 13/02/2017 is annexed as Annexure-F).
7. That Para-7 is correct that vide Notification sated 28/02/2019, the services of the appellant has been disowned by the Respondent No.2 after due process of law where against the appellant filed a W/P No. 2043-P/19 which was also dismissed by the Honorable Peshawar High Court Peshawar Vide Order Dated 23/05/2019. (Copy of the Order dated 23/05/2019 is annexed as Annexure-G).
8. That Para-8 is also incorrect & denied. The statement of the appellant is baseless & without any cogent proof & justification & is liable to be rejected in favor of the respondents as no Departmental appeal has been filled by the appellant to the appellate authority against the impugned order & Notification Dated 28/02/2019 to the appellate authority, hence, got finality.
9. That Para -9 is legal, however, the Respondents further submit on the following grounds inter alia:-

GROUNDS.


- A **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said notification dated 28/2/2019 by the respondent Department in the instance case, hence, the stand of the appellant is baseless & liable to be rejected.
- B **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said notification dated 28/2/2019 by the Respondent Department in the instance case, hence, the stand of the appellant is baseless & liable to be rejected.
- C **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents as the impugned Notification 28/02/2019 is the result of due process of law.
- D **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification on the grounds that the documents of the appellant have been found fake & bogus by the respondents, hence, his services against the ASDEO (F) B-16 post has been disowned by the competent authority vide notification date 28/2/209 under the relevant provisions of law & rules

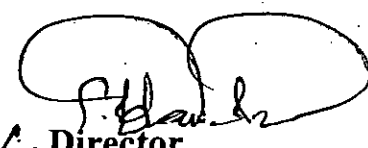
E **Incorrect & not admitted.** The plea of the appellant is without justification & liable to be rejected as the mentioned reported judgments of the apex courts of law do not apply upon the case of the appellant in the given circumstances of the case.

F **Legal.** However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favour of the Respondents in the interest of justice.

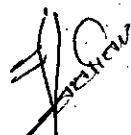
Dated ___/___/2019


Secretary
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


in Director
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 2)

AFFIDAVIT

I, **Hayat Khan Asstt: Director (Litigation-II)** E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.


Deponent

100

INSTRUMENTS





ANNEX F
96

Dated 15/12/2016

To

The Secretary to
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education Department

Subject: Recruitment of 15 Female ADO (B-16) in Elementary & Secondary
Education Deptt: Adv.No. 2/2015 & S.No. 26

Dear Sir,

In continuation to this office letter No.012399 dated: 16.3.2016 and to state that the commission recommends two candidates in to the Govt. for appointment against the subject cited posts

- | | |
|--|-----------------|
| (1) Mst Sadia Bibi D/O Muhammad Akram Shah | Molimand Agency |
| (2) Mst Sarfia D/O Ajmal Khan | Molimand Agency |

2. Recommendation in favour of the recommendees are provisional subject to their medical fitness and verification of all documents and perusal of their ACR PIR which should be provided at the earliest.

3. Recommendation of only two (02) candidates have been kept pending due to their vital deficiencies.

4. Original application (with enclosure) of the above two selectees are enclosed herewith for your record.

5. Kindly acknowledge receipt of the same.

Your faithfully,

ATTESTED

(Ghulam D) Sign
Director P. & S. E. D.

5 copies

A

Ammonia

DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION

KHYBER PAKHTUNKHWA PESHAWAR

NO. /A-17/ADEO/F/PSC/Apptt:/2015-16

Dated Peshawar the 26/1/2017

ANNEX "G"

27

To

The Director General ~~Health~~
Khyber Pakhtunkhwa Peshawar

SUBJECT:- RECRUITMENT OF 15 FEMALE ADO (B-16) IN ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT ADVER: NO. 2/2015 AND S.NO.26

Memo:-

I am directed to refer to the subject cited above and to say that the following ADEO (F) candidate resident of Zone-I have been recommended by the Khyber Pakhtunkhwa Public Service Commission (PSC) for appointment as Assistant District Education Officer (F) in B-16 in the Education Department.

S.No	Name with father name	Domicile/Zone
1	Sadia Bibi D/O Muhammad Akram Shah	Mohmand Agency/1
2	Saira D/O Ajmal Khan	Mohmand Agency/1

It is therefore requested that Medical Board for the above candidates may very kindly be arranged and findings of the Standing Medical Board thereof may be communicated to this office as an early date for further necessary action please.

Deputy Director Establishment(F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. 5203-4

Copy forwarded to the:-

- 1- Section Officer(Primary) Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department w/r to his No.SO(PE)E&SED/3-9/Public Service Commission/2016 dated 28-12-2016.
- 2- Mst.Sadia Bibi D/O Muhammad Akram Shah Mohmand Agency
- 3- Mst.Saira D/O Ajmal Khan Mohmand Agency
- 4- PA to Director E&SE Local Office.

Deputy Director Establishment(F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

/Noor/17/

ATTESTED

5 copies

B

Amesbury

10

MEDICAL CERTIFICATE

98

Saiba D/o Ajmal Khan
Muslim

Residence: Ajmal Khan
Village: Mirza Dher Teh Tangi
District: Charsadda

Date of birth: 01.04.1989

Exact height by measurement: 5'5"

Personal mark of identification: NIL

Signature of the official: [Signature]

Signature of head of office: [Signature]

Seal of office: S.D.E.O (F)

I do hereby certify that I have examined Mr. Saiba a candidate
for employment in the Office of the Education Deptt
and cannot discover that he had any disease communicable or other constitutional affection or bodily
infirmary except NIL

I do not consider this as disqualification for employment in the office of the as above
His age according to his own statement 28 year and by appearance about
year. twenty eight

MEDICAL SUPERINTENDENT,
CIVIL HOSPITAL

LEFT HAND THUMB AND FINGER IMPRESSIONS

ATTESTED



ANNEX 'H'

(29)

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@yahoo.com

NOTIFICATION

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of ADEO/ASDEO(Female) BPS-16 (Ra.12910-1035-34960) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Management Cadre on the terms and condition given below with immediate effect and further their services are placed at the disposal of DEO(F) concerned for further posting against vacant ADEO/ASDEO(F) posts:-

S. #	Name	Father Name	Domicile	Zone	Permanent address	Remarks
1	Mst. Sudia Bibi	Muhammad Akram Shah	Mohmand Agency	1	Village Chail Tuzagram P/O und Khawar Tehsil and District Mardan	Service is placed at the disposal of DEO (F) Nowshera for further posting against vacant ADEO/ASDEO posts.
2	Mst. Salra	Ajmal Khan	Mohmand Agency	1	Village Khan Mir Killi P/O Ziam Killi Tehsil Tangi District Charsadda	Service is placed at the disposal of DEO (F) Charsadda for further posting against vacant ADEO/ASDEO posts.

TERMS AND CONDITIONS:-

- 1- Their services will be considered regular under the Khyber Pakhtunkhwa Civil Servant Amendment Act, 2013 and Finance Department Circular No SQSR-III /FD/12-1/2005 dated 27-02-2013.
- 2- Their services are liable to termination on one months notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
- 3- They should join the post within 30 days of the issuance of this notification. In case of failure to join their post within one month of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 4- They should be on probation for a period of one year extendable for another one year.
- 5- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 6- Their services can be terminated at any time. In case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 7- Charge report should be submitted to all concerned.
- 8- The DEO (F) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of their posting orders.
- 9- The DEO (F) concerned will verify their documents before release of pay.
- 10- Their seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
- 11- No TA/DA etc will be allowed to the appointee for joining their duty.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. 881-875 IA-17/ADEO(F) 2015-16/Public Service Commission

Dated Peshawar the 2/2 2017.

Copy of the above is forwarded to the:-

- 1- District Education Officer(Female) concerned
- 2- District Account Officer, concerned
- 3- Mistress concerned
- 4- PA to Director (E&SE) Local Office.
- 5- Master file.

Deputy Director Establishment(F)
(E&SE) Khyber Pakhtunkhwa,

ATTESTED

ATTESTED

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR.

Writ Petition No. _____/2019
Alongwith Interim Relief

Mst. Saira D/o Ajmal Khan, ADEO (F) Swabi R/o Mirzadner, Tehsil Tangi,
District Charsadda.

..... PETITIONER

....VERSUS....

1. National Accountability Bureau (NAB) through its Chairman, NAB Head Quarters, Ataturk Avenue, Islamabad.
2. Director General, National Accountability Bureau (KP), PDA Buildings, Phase-V, Hayatabad, Peshawar.
3. Director Anti-Corruption, Khyber Pakhtunkhwa, Phase-V, Hayatabad PeshawarRESPONDENTS

4- KP PSC

=====

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

=====

Respectfully Sheweth:

1. That petitioner, being eligible, was appointed as ADEO/ASDEO (Female) BPS-16, on regular basis, in the Elementary & Secondary Education Department, Khyber Pakhtunkhwa, on the recommendation of Khyber Pakhtunkhwa Public Service Commission, vide Notification No. 881-85/A-17/ADEO(F)2015-16/Public Service Commission dated: 02.02.2017. (Copies of CNIC alongwith Domicile Certificate, Educational testimonials and Notification dated: 02.02.2017 alongwith Medical Certificate, are attached as Annexure "A", "B" & "C", respectively)
2. That petitioner was subsequently adjusted against the vacant post of ADEO(F), at the office of the DEO-(F) Charsadda, vide office order No.2395-99 Dated: 13.02.2017. Needless to add that appointment order of the petitioner was verified on 25.01.2018. (Copy of office order dated: 13.02.2017 and Verification of appointment order 25.01.2018, are attached as Annexure "D" & "E", respectively)
3. That NAB-KP authorized inquiry against officers/officials of Directorate of Elementary & Secondary Education of Khyber Pakhtunkhwa & others regarding misappropriation of funds and illegal appointments in various cadres, including appointment Notification of the petitioner, evident from NAB Callup Notice dated: 28.09.2018.

ATTESTED

ANNEX 'J' (31)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

OFFICE ORDER.

In the light of Notification issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Endst: No.881-85/A-17/ADEO (F) 2015-16 Public Service Commission dated 02/02/2017.

Mst: Saira ASDEO (F) B.16 is hereby posted /adjusted against the vacant post at Circle Shakardhand SDEO(F) Charsadda in the best interest of public service with effect from her arrival report i.e 04/02/2017.

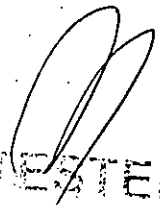
- Note: 1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

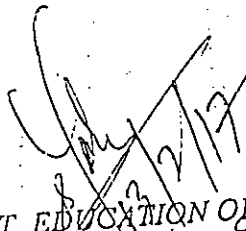
(MST; SOFIA TABASSUM)
DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA

ENDST NO 2395-98 Dated 1/13/2/2017.

Copy for information to the :

1. Director E&SE Khyber Pakhtunkhwa Peshawar w/r his letter No: and dated cited above
2. District Accounts Officer Charsadda.
3. SDEO(F) Charsadda
4. ASDEO(F) Circle Concerned.
5. Office File.




ATTESTED


DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA


ATTESTED

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

Date of Order of Proceedings	Order of other Proceedings with Signature of Judge.
1	2
11.04.2019	<p><u>WP No.2044-P of 2019.</u></p> <p>Present: Clerk of counsel for the petitioner.</p> <p>*****</p> <p>The facts of the case reveals that the matter of appointment exclusively pertains to the Public Service Commission, therefore, in view of Order 1 Rule 10 of CPC, the Khyber Pakhtunkhwa Public Service Commission being necessary part, is impleaded in the panel of respondents as respondent No.4. All the respondents shall submit their comments positively within a fortnight.</p> <p>Adjourned.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;"> JUDGE</p>

ATTESTED

DB-Hon'ble Mr. Justice Ikramullah Khan & Hon'ble Mr. Justice Ijaz Anwar

Himayat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 877/2019

MST. SAIRA.....APPELLANT.

VS

GOVT OF KHYBER PAKHTUNKHWA & OTHERS..... RESPONDENTS.

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Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission Peshawar
(Respondent)

Ums No.

88662915

Date: 31/1/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 877/2019

MST. SAIRA.....APPELLANT.

VS

GOVT OF KHYBER PAKHTUNKHWA & OTHERS..... RESPONDENTS.

PARAWISE COMMENTS / REPLY ON BEHALF OF RESPONDENT NO.03

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:

1. The documents annexed by the appellant purported to be issued by Public Service Commission to her and her recommendation are fake and fabricated.
2. That appellant has not come to this Honorable Service Tribunal with clean hands.
3. That instant service appeal is a bundle of illogical and unjustified allegations against the Respondent No.3.
4. That as per record of Khyber Pakhtunkhwa Public Service Commission the appellant has neither applied via public service commission nor she has been recommended against the said post.
5. That instant appeal is consisted of misstated facts before this Honorable Forum.
6. That instant service appeal is not tenable in the eyes of law.

ON FACTS:

1. Requires proof.
2. Requires proof.
3. The Khyber Pakhtunkhwa Public Service Commission advertised Fifteen (15) Leftover Posts of Female Assistant District Officer (A.D.O) vide advertisement 02/2015 at serial No. 26 with the following qualification.

QUALIFICATION: BA/ B.Sc 2nd Division with B.Ed and Five years teaching/ administrative experience in Govt: recognized education institution/ office.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Zone-1.

Annex-A

In response to Advertisement No. 02/2015 dated 05.03.2015 Serial No. 26. A total 320 applications were received. After screening test result 228 candidates were shortlisted for interview. 206 candidates were rejected on technical grounds. 22 candidates were called for interview. 15 candidates failed the interview while 07 candidates qualified and were recommended for the post of Female A.D.O.

4. Incorrect. Appellant neither applied nor got recommended. As the appellant was not a candidate, her recommendation for the subject post is out of question. It is pertinent to mention here that only seven (07) candidates were recommended against the fifteen (15) post of Female A.D.Os from Zone-1 while remaining 08 post of Female A.D.Os from Zone-1 were leftover and were re-advertised in advertisement No. 01/2016 dated 09.03.2016. Hence, recommendation letter purported to be issued by the Khyber Pakhtunkhwa Public Service Commission attached with the Service Appeal, is fake. Her name stands nowhere in the merit list. The appellant is in possession of forged and fabricated recommendation letter. Merit list of the seven qualified candidates prepared then by Public Service Commission is tabulated as under:

Merit order	Total Marks	Interview Marks	Date of Birth	Name with Father's Name	Domicile/Zone
1.	61	39	15.03.86	Sarwat Samandar D/O Samandar Khan	Moh:Agy/1
2.	58	36	20.02.86	Rizwana Gul D/O Muhammad Qasim Khan	F.R. Lakki/1
3.	52	31	15.02.86	Rubina Marwat DJ/O	N.W. Agy:/1

				Najeebullah	
4.	50	32	06.05.87	Salma Begum D/O Isa Khan	Moh: Agy:/1
5.	50	32	10.03.88	Shakla Naz D/O Taj Omer	Moh: Agy:/1
6.	50	30	20.04.87	Naseem Bibi D/O Amin Gul	S.W Agy:/1
7.	47	32	20.02.81	Bibi Sajida D/O Syed Muhammad Ibrahim	Orakzai Agy:/1

As per the position tabulated above, and record of the Respondent No.3, the appellant has neither applied nor was ever recommended by the answering respondent, Khyber Pakhtunkhwa Public Service Commission.

Copy of merit list is **Annex-B**.

Copy of Advertisement No. 01/2016 dated 09.03.2016 **Annex-C**.

5. Not relevant to Public Service Commission. However, as stated in preceding para the appellant is in possession of forged documents.

6-8. Not relevant to the answering respondent.

9. That appellant was never recommended by Khyber Pakhtunkhwa Public Service Commission. The supporting recommendation letter is fake and forged. The appellant is not entitled to approach this Honorable Tribunal on the present like baseless misleading grounds.

GROUND


A-C. Not relevant to Public Service Commission.

D. Incorrect. Appellant was never recommended against the said post by the Public Service Commission.

E. Not relevant to Public Service Commission.

F. Appellant may not be allowed to raise any point before this Honorable Service Tribunal which may result in wastage of precious time of this Honorable forum.

It is, therefore, most humbly prayed that on acceptance of these comments, appeal in hand may kindly be dismissed with cost as the appellant neither applied nor recommended for the desired post by Respondent No. 03.


CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)

Shahis

AFFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

DEPONENT

**CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)**

(6)

Annex A

**KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION**

2- Fort Road Peshawar Cantt:

Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 05.03.2015

ADVERTISEMENT No. 02 / 2015.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **03.04.2015** (candidates applying from abroad by **17.04.2015**). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

26.	FIFTEEN (15) (LEFTOVER) POSTS OF FEMALE A.D.O. QUALIFICATION: BA/ B.Sc 2 nd Division with B.Ed and Five years teaching/ administrative experience in Govt. recognized education institution/ office. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Female. ALLOCATION: Zone-1.
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(Sharif Hussain)
Secretary
Khyber Pakhtunkhwa
Public Service Commission
Peshawar

SUBJECT:

RECRUITMENT OF FIFTEEN (15) LEFTOVER POSTS OF FEMALE ASSISTANT DISTRICT OFFICER (BPS-16) IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT. (ADVT: NO. 02/2015, S.NO.26)

Annex-B

This case deals with the recruitment of fifteen (15) leftover posts of Female Assistant District Officer (BPS-16) in Elementary & Secondary Education Department. These leftover posts were advertised in our Advertisement No. 02/2015, S.No. 26 dated 05.03.2015 (Page-18/C) with the following qualifications:

"BA/B.Sc 2nd Division with B.Ed and Five years teaching / administrative experience in Govt: recognized education institution / office."

In response to our advertisement, 320 candidates have applied. Ability test was conducted in the subject on 02.09.15. The examination branch handed over the result on 03.11.15 and as a result 228 candidates qualified the test as per detail given below: -

No. of post(s)	Total No. of appl. received	No. of candidates qualified Ability Test	Rejected	Called for interview	Absent	Failed	Qualified
15	320	228	206	22	--	15	07

Interviews in the subject were conducted from 8th to 18th December, 2015 and as a result the following seven (07) candidates have qualified the interview: -

Merit Order	Total Marks	Interview Marks	Date of Birth	Name with Father's Name	Domicile/Zone	Page No.
1. ✓	61	39	15.03.86	Sarwat Samander D/O Samander Khan ✓	Moh: Agy:/1 ✓	23
2. ✓	58	36	20.02.86	Rizwana Gul D/O Muhammad Qasim Khan ✓	F.R. Lakki/1 ✓	44
3. ✓	52	31	15.02.86	Rubina Marwat D/O Najeebullah ✓	N.W.Agy:/1 ✓	34
4. ✓	50	32	06.05.87	Salma Begum D/O Isa Khan ✓	Moh: Agy:/1 ✓	30
5. ✓	50	32	10.03.88	Shakla Naz D/O Taj Omer ✓	Moh: Agy:/1 ✓	35
6. ✓	50	30	20.04.87	Naseem Bibi D/O Amin Gul ✓	S.W.Agy:/1 ✓	40
7. ✓	47	32	20.02.81	Bibi Sajida D/O Syed Muhammad Ibrahim ✓	Orakzai Agy:1 ✓	22

According to zonal allocation, the adjustment of these fifteen (15) leftover posts is as under: -

5TH BLOCK:

Vacancy Rotation	Allocation	Merit Order	Name with Father's Name	District / Zone	Adjustment
15 th ✓	Zone-1 ✓	01 ✓	Sarwat Samander D/O Samander Khan ✓	Moh: Agy:/1 ✓	Own Quota ✓
22 nd ✓	Zone-1 ✓	02 ✓	Rizwana Gul D/O Muhammad Qasim Khan ✓	F.R. Lakki/1 ✓	Own Quota ✓

6TH BLOCK:

Vacancy Rotation	Allocation	Merit Order	Name with Father's Name	District / Zone	Adjustment
2 nd ✓	Zone-1 ✓	03 ✓	Rubina Marwat D/O Najeebullah ✓	N.W.Agy:/1 ✓	Own Quota ✓
8 th ✓	Zone-1 ✓	04 ✓	Salma Begum D/O Isa Khan ✓	Moh: Agy:/1 ✓	Own Quota ✓
15 th ✓	Zone-1 ✓	05 ✓	Shakla Naz D/O Taj Omer ✓	Moh: Agy:/1 ✓	Own Quota ✓
22 nd ✓	Zone-1 ✓	06 ✓	Naseem Bibi D/O Amin Gul ✓	S.W.Agy:/1 ✓	Own Quota ✓

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7TH BLOCK: ✓

Vacancy Rotation	Allocation	Merit Order	Name with Father's Name	District / Zone	Adjustment
2nd ✓	Zone-1 ✓	07 ✓	Bibi Sajida D/O Syed Muhammad Ibrahim ✓	Orakzai Agy:1 ✓	Own Quota ✓
8th ✓	Zone-1 ✓	—	No Qualified Candidate	—	—
15th ✓	Zone-1 ✓	—	No Qualified Candidate	—	—
22nd ✓	Zone-1 ✓	—	No Qualified Candidate	—	—

8TH BLOCK: ✓

Vacancy Rotation	Allocation	Merit Order	Name with Father's Name	District / Zone	Adjustment
2nd ✓	Zone-1 ✓	—	No Qualified Candidate	—	—
8th ✓	Zone-1 ✓	—	No Qualified Candidate	—	—
15th ✓	Zone-1 ✓	—	No Qualified Candidate	—	—
22nd ✓	Zone-1 ✓	—	No Qualified Candidate	—	—

9TH BLOCK:

Vacancy Rotation	Allocation	Merit Order	Name with Father's Name	District / Zone	Adjustment
2nd ✓	Zone-1 ✓	—	No Qualified Candidate	—	—

Recommendation in favour of the above recommendees may be provisional subject to their medical fitness and perusal of ACRs which are required for satisfaction of the Commission regarding final recommendation. Moreover, the department may also confirm that ACRs furnished by the concerned department are duly signed by the relevant reporting officer and counter signing authority. The department may ensure that the recommendee did not avail E.O.L service break or proceeded on deputation etc otherwise the same may be brought in to the notice of Public Service Commission and verification of documents by the concerned department.

Up-to date zonal state will be as under: -

	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
Share	49	33 ✓	32	32	24	24	194 ✓
Adjustment	49	25 ✓	32	32	24	24	186 ✓
Balance	—	08 ✓	—	—	—	—	08 ✓

Eight (08) unfilled posts will be re-advertised.

Submitted for approval please.

Assistant *Quitch 21/12/15*

A 3
Superintendent *21/12/2015*

Assistant Director-III *[Signature]*

Deputy Director-I *[Signature]*

Director Recruitment

[Signature]
Approved *21/12/15*

Capt: (Rtd.) Jamil Amjad
Member - III

Muhammad Hamayun
Member IX

Approved.

[Signature]
Hamayun 21/12/15
... Sheet

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Annex C

**KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION**

2- Fort Road Peshawar Cantt:

Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 09.03.2016

ADVERTISEMENT No. 01 / 2016.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **08.04.2016**. Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

ELEMENTARY & SECONDARY EDUCATION DEPTT:

21. EIGHT (08) (LEFTOVER) POSTS OF FEMALE A.D.O IN ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

QUALIFICATION: BA / B.Sc 2nd Division with B.Ed and five years Teaching / Administrative experience in Govt: recognized education institution / office.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

(Sharif Hussain)

Secretary

Khyber Pakhtunkhwa
Public Service Commission
Peshawar

Telephone No. 091-9222516



KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
2-FORT ROAD, PESHAWAR CANTT
(NEAR GOVERNOR HOUSE)

AUTHORITY LETTER

Mr. Mehtab Gul, Law Officer (BPS-17), Khyber Pakhtunkhwa Public Service Commission is hereby nominated / authorized to get the comment vetted and submit on behalf of Chairman, Khyber Pakhtunkhwa Public Service Commission.

A handwritten signature in black ink, appearing to be 'M. Mehtab Gul', is written over the printed name of the Secretary.

Secretary
Khyber Pakhtunkhwa
Public Service Commission