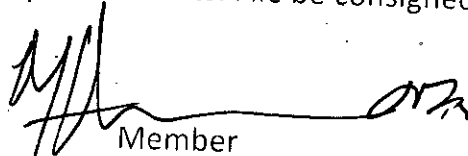


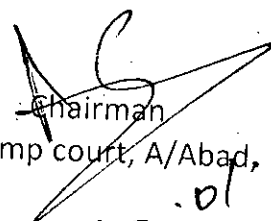
17.01.2017

Counsel for the appellant and Mr. Muhammad Siddique, Senior Government Pleader alongwith Mr. Muhammad Usman Senior Clerk for the respondents present. Arguments heard. Record perused.

Vide our detailed judgment of to-day placed in connected service appeal No. 744/2015 titled "Shahida Bibi Versus Government of Khyber Pakhtunkhwa through Secretary, E&SE Peshawar and others", we accept the instant appeal also as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record room.


  
Member

ANNOUNCED  
17.01.2017

  
Chairman  
Camp court, A/Abad, 17.  
17.01.17

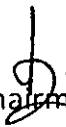
19.5.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Amended appeal not submitted. Requested for further adjournment. Amended appeal shall be submitted in office within 7 days which shall be placed before S.B after scrutiny by the Registrar, on 19.08.2016 at camp court. Abbottabad.

  
Chairman  
Camp Court, A/Abad.


19.08.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Amended appeal submitted and copies whereof handed over to learned Sr.GP and representative of the respondents. To come up for written reply on amended memo: of appeal on 23.09.2016 before S.B at camp court, Abbottabad.

  
Chairman  
Camp court, A/Abad.

23.09.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Written reply by respondents No. 1 to 3 submitted. Learned Sr.GP relies on the same on behalf of respondent No. 4. The appeal is assigned to D.B for rejoinder and final hearing for 17.01.2017 at camp court, Abbottabad.

  
Chairman  
Camp court, A/Abad

21.1.2016

None present for appellant. Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Application for permission for filing amended appeal has already been submitted. To come up for reply on application before S.B on 20.4.2016 at Camp Court A/Abad.


  
Chairman  
Camp Court A/Abad

20.04.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Muhammad Siddique, Sr.GP for the respondents present. Reply to application not submitted. Arguments on application heard and record perused.

Appellant is seeking amendment in the service appeal as departmental appeal of the-appellant dated 10.3.2015 was not decided at the time of filing of appeal which was decided thereafter on 25.08.2015. Learned counsel for the appellant intends to impugn the same by amending the appeal.

Since the departmental appeal of the appellant has been decided after filing of the service appeal and the appellant intends to impugn the same as well, as such the application is allowed and appellant shall therefore submit amended appeal in office within two weeks which shall be placed before this court (S.B) after scrutiny by the Registrar, on 19.05.2016 at camp court, Abbottabad.

  
Chairman  
Camp court, A/Abad.

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant and was serving as such when dismissed from service vide impugned order dated 3.3.2015 on the allegations of procuring illegal appointment regarding which she preferred departmental on 10.3.2015 which was not responded and hence the instant service appeal on 6.7.2015.

That the appellant was appointed in the prescribed manners and that no inquiry whatsoever was conducted in the prescribed manners and as such the impugned order is a nullity in the eye of law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed.

  
Chairman

Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Requested for adjournment. To come up for written reply/comments on 21.01.2016 before S.B at Camp Court A/Abad.

  
Chairman



Camp Court A/Abad.



Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 746/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	06.07.2015	<p style="text-align: center;">The appeal of Mst. Rani Gul presented today by Mr. Abdul Saboor Khan Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<p style="text-align: center;">This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

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

Amended Appeal No. \_\_\_\_\_/2016

Mst. Rani Gul, PST, Tehsil & District, Mansehra.

...APPELLANT

**VERSUS**

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

**AMENDED SERVICE APPEAL**

**INDEX**

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Amended service appeal along with affidavit	1 to 12	
2.	Copies of educational record	13-20	"A"
3.	A copy of advertisement	21	"B"
4.	Copies of E.T.A test result	22-	"C"
5.	Copy of appointment letter	23-24	"D"
6.	Copy of pay slip	25-27	"E"
7.	Copy of the letter of election duty	28-29	"F"
8.	Copy of show cause notice	30	"G"
9.	Copy of reply		"H"
10.	Copy of impugned order dated 03/03/2015	31-	"I"
11.	Copy of departmental appeal and receipt	32-35	"J"
12.	Copy of rejection order dated 26/04/2016		"K"
13.	Copy of application and order dated 26/04/2016	36-37	"L"
14.	Wakalatnama	38	

*Rani Gul*  
...APPELLANT

Through

Dated: \_\_\_\_\_/2016

*(Muhammad Arshad Khan Tanoli)*  
Advocate High Court, Abbottabad

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Distt Bar Abbottabad

1

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

Amended Appeal No. 746 /2016

Mst. Rani Gul, PST, Tehsil & District, Mansehra.

**...APPELLANT**

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer, Elementary & Secondary Education (Female), District Mansehra.

**...RESPONDENTS**

**AMENDED APPEAL UNDER SECTION 4 OF  
THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE  
IMPUGNED ORDER DATED 03/03/2015 AND  
REJECTION ORDER DATED 25/08/2015  
WHICH WAS PASSED BY THE  
DEPARTMENT AFTER APPEAL FILLED IN**

TRIBUNAL WHEREBY THE  
DEPARTMENTAL APPEAL OF APPELLANT  
AGAINST THE ORDER OF DISMISSAL FROM  
SERVICE HAS BEEN REJECTED FOR NO  
GOOD GROUNDS, HOWEVER DISMISSAL  
ORDER IS CONVERTED INTO REMOVAL  
FROM SERVICE.

---

**PRAYER:** ON ACCEPTANCE OF THIS  
APPEAL, THE IMPUGNED ORDER DATED  
03/03/215 AND 25/08/2015 MAY BE SET  
ASIDE AND THE APPELLANT MAY BE  
REINSTATED INTO SERVICE WITH ALL  
BACK AND CONSEQUENTIAL BENEFITS.  
ANY OTHER RELIEF WHICH THIS  
HONOURABLE TRIBUNAL DEEMS FIT AND  
PROPER THAT MAY ALSO BE GRANTED TO  
THE APPELLANT.

---

Respectfully Sheweth;-

1. That the appellant is resident of village  
khaki (Union council Bherkhund, Tehsil &  
District, Mansehra District Mansehra. That



the appellant is fully qualified and having the required documents/certificates. (Copies of educational record are attached as Annexure "A").

2. That the District Education Officer, Mansehra/respondent No. 3 advertised some vacancies in Daily Mashriq. (A copy of advertisement is attached as Annexure "B").
3. That, as per procedure, the appellant applied for the post of PST being a qualified teacher having required qualification. E.T.A test was conducted on 26/02/2011 and the appellant appeared as a candidate and obtained 176 marks out of 300 under roll No. 17013110. (Copies of E.T.A test result is attached as Annexure "C").
4. That then the EDO conducted interview and scrutinized the documents of the candidates, and merit list of the candidates was displayed for receiving objections. During the process, the appellant have submitted her appeal to the extent that her name was not in

the merit list whereas the appellant have properly applied and Roll No. was also issued to the appellant by the department/ ETEA. After the official process, the meeting of DSC was held and approved the case of appellant for appointment against the vacant post of PST and on the acceptance of the appeal by the competent authority the appointment order of the appellant was issued under Endst. No. 1120-29 Estt: Appt: PST/2011-2012 dated 20/06/2012 and the appellant was posted GGPS Monjhani in adjacent U/C and later on Transferred and adjusted at GGPS Hari Nakka Schools. (Copy of appointment letter is annexed as Annexure "D").

5. That the appellant performed her duties very honestly, regularly with devotion and dedication since the time of her appointment in above mentioned different school and also received her salaries, from June, 2012 to June 2015. (Copy of pay slip is attached as Annexure "E").

6. That the appellant was also directed to perform election duty during the general election duty 2013 & local election of 2015. (Copy of the letter of election duty is attached as Annexure "F").
7. That the appellant was continuously performing her duties without any break for the period for which the salaries were received and has never been found guilty of any kind of absence, misconduct, misfeasance, malfeasance or nonfeasance, nor been found guilty of dereliction of duty without taking these things into consideration, the respondent No. 3 issued show cause notice to the appellant leveling baseless allegations against the appellant there in. (Copy of show cause notice is attached as Annexure "G").
8. That appellant properly submitted reply to show cause notice and denied all the alleged allegations therein. Copy of reply is attached as annexure "H".

9. That the appellant was also directed to perform exam duty as deputy superintendent March 2014 and Higher Secondary exam duty as a deputy superintendent 2015.
10. That the appellant's appointment was terminated through impugned dismissal order dated 03/03/2015 by imposing major penalty of dismissal from service. (Copy of impugned order dated 03/03/2015 is attached as Annexure "I").
11. That the appellant filed a departmental appeal against the order dated 03/03/2015 but the departmental appeal of appellant against the order of dismissal from service dated 03/03/2015 which was not responded within statutory period, then the appellant preferred a service appeal No. 745/2015 before the KPK service Tribunal Peshawar. (Copy of departmental appeal and receipt attached as Annexure "J").
12. That during the pendency of appeal the appellate authority has issued notification

dated 25/08/2015, whereby the departmental appeal of the appellant has been rejected however the appellant's penalty order issued by the DEO (Female), Mansehra vide order dated 03/03/2015 is modified to the extent of conversion of penalty of dismissal into removal from service. (Copy of rejection order dated 26/04/2016 is attached as Annexure "K").

13. That thereafter, the appellant filled an application for amendment of appeal which was allowed by the Honourable Tribunal vide order dated 26/04/2016. Hence the amended appeal on the basis of following grounds amongst others. (Copy of application and order dated 26/04/2016 are attached a annexure "L").

**GROUND:-**

- a. That the impugned order dated 03/03/2015 and 25/08/2015 are against the law, facts, norms of justice, arbitrary fanciful, perverse,

without lawful authority, based on malafide, unconstitutional and not maintainable and liable to be set aside.

- b. That the service of the appellant was terminated on the fact that the appellant appointment was the result of misuse of the authority by the then EDO, Umer Khan Kundi such fact cannot legally be made base for removal from the service and same is the case of appellant. The appellant legally, as per the rule and policy of good governance and in the constitution could have not been penalized with major penalty for act.
- c. That, however, the appellant's penalty order issued by the DEO (Female) Mansehra vide order dated 03/03/2015 is modified to the extent of conversion of penalty of dismissal into removal from service by showing

reason that the appointment of appellant is illegal.

- d. That, perusal of first para of impugned show cause notice is self-explanatory and worth considering for reinstatement of the service of the appellant.
- e. That there is no ill-gotten means against the appellant and section-20 of General Clause Act is not applicable to the case of the appellant because appellant has not been found guilty of any misconduct or procuring her service through any fraudulent means.
- f. That in the light of authoritative decision/views of the superior judiciary including the Supreme Court of Pakistan, the service of the appellant could not have been terminated and the impugned order could not have been issued because where the authority is guilty of

irregularities, illegalities and procedural violations, the service of an employee cannot be terminated.

- g. That the appellant has not been allowed fair opportunity of personal hearing, thus the appellant have been condemned unheard.
- h. That no proper procedure has been followed before awarding appellant the major penalty, no proper inquiry has been conducted, the appellant have not been properly associated with the inquiry proceedings, statements of witnesses if any were never taken in the appellant presence nor the appellant have been allowed opportunity of cross examination, thus the proceedings so conducted are defective in the eye of law.
- i. That on the acceptance of the appeal by the competent authority the appointment order of the appellant



was issued under Endst. No. 1120-29/Estt: Appt: PST/2011-2012 dated 20/06/2012 and the appellant was posted at GGPS Monjhani.

- j. That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, humbly prayed that on acceptance of this appeal, the impugned order dated 03/03/2015 and 25/08/2015 may be set aside and the appellant may be re-instated into service with all back and consequential benefits. Any other relief which this Honourable Tribunal deems fit and proper that may also be granted to the appellant.

*Ramizul*  
...APPELLANT

Through

Dated: \_\_\_\_\_/2016

*Muhammad Arshad Khan Tanoli*  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

**VERIFICATION: -**

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

...APPELLANT

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

Amended Appeal No. \_\_\_\_\_/2016

Mst. Rani Gul, PST, Tehsil & District, Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

**AMENDED SERVICE APPEAL**

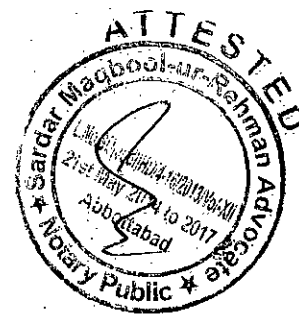
**AFFIDAVIT**

I, Mst. Rani Gul, PST, Tehsil & District, Mansehra, do hereby solemnly affirm and declare that the contents of forgoing amended appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*Rani Gul*  
DEPONENT

Identified by;

*Muhammad Arshad Khan Tanoli*  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad  
Office No. 33 Adjacent to  
9th Floor Abbottabad



No. 132338

SASC

P-13

Board of Intermediate & Secondary Education  
ABBOTTABAD

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)



Session 200 D (Annual/Supplementary)

Annex-A

Name Ravi Gul

Father's Name Dildar Roll No. 3258

SUBJECT	Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. English	150	97	
2. Urdu	150	103	
3. Islamiyat Comp.	75	53	
4. Pakistan Studies	75	48	
5. Gen. Mathematics	100	31	
6. General Science	100	53	
7. Art	100	68	
8. I-S	100	57	
<b>Total</b>	<b>850</b>	<b>528</b>	<b>B</b>

SECRET OFFICER  
BISE Abbottabad

RESULT

This Certificate is issued errors and omission excepted.

Prepared by: Nasir Checked by: [Signature]

Date 15 NOV 2000 Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Attest

[Signature]  
Muhammad Arshad Khan Janoli  
Advocate High Court  
Office No 33 Adjacent to  
Dist. Court Abbottabad

BOARD OF INTERMEDIATE & SECONDARY EDUCATION  
DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination

106A

P

14

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD  
 DETAILED MARKS CERTIFICATE  
 Higher Secondary School Certificate Examination  
 Part-II

Sr. No. Z1-7805.....

Name: RANI GUL  
 Father's Name: DILDAR  
 Group: HUMANITIES

Session: 2003 (Supply)

Roll No: 3473



Subjects	Marks	Marks Obtained						Marks in Words
		Part-I		Part-II		Total		
		Theory	Pract	Theory	Pract			
English	200	33	-	33	-	66	Sixty-Six	
Urdu (Comp)	200	48	-	67	-	115	One Hundred Fifteen	
Islamic Education	50	32	-	-	-	32	Thirty-Two	
Pakistan Studies	60	-	-	17	-	17	Seventeen	
Civics	200	40	-	51	-	91	Ninety-One	
Islamic Studies	200	54	-	60	-	114	One Hundred Fourteen	
Urdu (Advance)	200	33	-	56	-	89	Eighty-Nine	
<b>Total</b>						<b>524</b>	<b>Five Hundred Twenty-Four Only</b>	

RESULT VERIFIED  
 HSSC SECRETARY  
 Total: 1100

OFFICER  
 Board of Intermediate  
 & Secondary Education  
 Abbottabad

Remarks:

Checked By: \_\_\_\_\_  
 Date: 31-January, 2004

Controller of Examinations  
 Board of Intermediate & Secondary Education  
 Abbottabad

Note: Errors / Omissions excepted

Attested

Muhammad Arshad Khan Janjani  
 Advocate High Court  
 Office No 33 Adjacent to  
 Dist. Bar Abbottabad

BoA

10366/A/04

SNo: 3772

PAK  
P-18

# HAZARA UNIVERSITY, MANSEHRA, NWFP, PAKISTAN



## DETAILED MARKS CERTIFICATE BA Supplementary 2005

Roll No: 06617

Registration No: 04-P-870

Student's Name: Rani Gul

Father's Name: Dildar Tanoli

Institution/District: Mansehra

Part: Second

10366/A/04  
Page 214/388  
23/09/13

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. Part 1 Marks	285	145	One Hundred & Forty-Five	Pass
2. English Compulsory	75	25	Twenty-Five	Pass
3. Pakistan Studies	40	18	Eighteen	Pass
4. Urdu	75	44	Forty-Four	Pass
5. Islamic Studies	75	44	Forty-Four	Pass
<b>Total</b>	<b>550</b>	<b>276</b>		
<b>Percentage</b>	<b>50.18 %</b>			
<b>Division</b>	<b>Second</b>			

Page 65/95  
23/09/13

Prepared by: M. Anwar Khan  
Checked by:

**VERIFIED BY**  
*M. Anwar Khan*  
Controller of Examination  
Hazara University Mansehra

Controller Examinations  
Hazara University, Mansehra  
December 25, 2005

Attested

*M. Anwar Khan*  
M. Anwar Khan  
Advocate High Court  
Office No: 33 Adjacent to  
Dett. Gov. Hospital

Note: Discrepancy in subject  
Certificate Student No: 10366/A/04

162

# HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SN: 1832

M.A  
P-16

## DETAILED MARKS CERTIFICATE

MASTER OF ARTS ( FINAL )  
ANNUAL EXAMINATION 2010

Roll No: 31528

Reg No: 04-P-870

Name: Rani Gul

F/ Name: Dildar Tanoli

Institution/  
District: MANSEHRA

Subject: Urdu

62744/A/07

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				235	TWO HUNDRED THIRTY-FIVE	
Poetry "Nazam"	100		46		46	FORTY-SIX	Pass
Qaseeda, Masnawi & Marsia	100		60		60	SIXTY	Pass
Iqbaliat	100		48		48	FORTY-EIGHT	Pass
Criticism	100		52		52	FIFTY-TWO	Pass
Essay	100		45		45	FORTY-FIVE	Pass
General Viva Voce	100		46		46	FORTY-SIX	Pass
<b>Total:</b>	1100				532	FIVE HUNDRED THIRTY-TWO	
<b>Percentage:</b>	48.36						
<b>Division:</b>	SECOND						

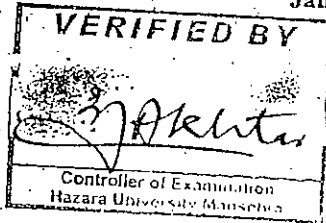
Page 214/54

Print Date: 04-01-2011

Checked By: \_\_\_\_\_

Errors and omissions are subject to subsequent rectification.  
Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Page 214/151  
23/09/2013  
Controller Examinations  
Hazara University, Mansehra  
January 04, 2011



Attested

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Distt. Jail Mansehra

R-17

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
DEPARTMENT OF EXAMINATIONS  
(Verification Section)

Confidential

No. F. 1-5/Verif/ 30056  
DISTRICT EDUCATION OFFICER (FEMALE)  
MANSEHRA

Dated: 06 Oct, 2013

*Signature*  
*for verification*  
*23/10/13*  
*D. I. C. (Verif)*

Subject: VERIFICATION OF CERTIFICATE(S)/DEGREE(S)/DIPLOMA(S)/TRANSCRIPT/  
PRC ISSUED BY ALLAMA IQBAL OPEN UNIVERSITY

Dear Sir/Madam,

This is with reference to Letter No. 7193 dated 12 Sep, 13  
on the subject noted above. It is certified that Certificate(s)/Degree(s)/Diploma(s)/ Transcript/PRC issued by  
the University to the following students are correct:

Sr. No	Student & Father's Name	Programme	Registration No.	Certificate/Degree/ Diploma/Transcript/ PRC No.
1	RANI GUL DIL DAR TANOLI	PTC	04-NMA-0058.	141745
2	RANI GUL DIL DAR TANOLI	B.ED	04-NMA-0058.	413497

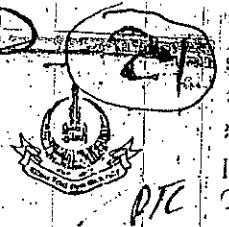
*Signature*  
Assistant Controller of Examinations  
Certificate Section  
Allama Iqbal Open University  
Islamabad.  
*ler*

*Attested*  
*Signature*  
Advocate High Court  
Office No 33 Adjacent to  
Court No. 10, Islamabad

*17/5/13*  
*24/10/2013*  
*DCS*  
*CFD*  
*Verification*

Serial No. 141745

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD



Name: RANI GUL  
Father's Name: DIL DAR TANOLI  
Address: DIL DAR TANOLI P/O KHAKI  
NEAR BY BOMBY MOSQUE  
Tehsil: MANSEHRA  
District: MANSEHRA

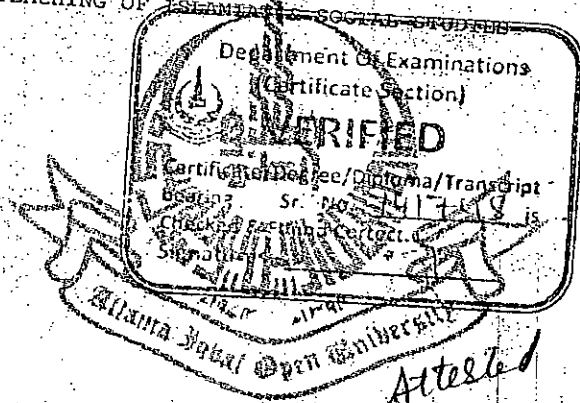
Roll No. U625053  
Registration No. 04NMA0058  
Final Semester AUT- 2006

has successfully completed PRIMARY TEACHING CERTIFICATE

P-18

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	68
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	76
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	62
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	78
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	80
AUT- 06	0617	TEACHING OF URDU	100	63
AUT- 06	0618	TEACHING OF MATHEMATICS	100	61
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	62
AUT- 06	0620	TEACHING OF ISLAMIC SOCIAL STUDIES	100	62



Attested  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent

CREDITS: 5

Result Declared on SEPTEMBER 20, 2007  
Date of issue SEPTEMBER 25, 2007

Total Marks / Obtained 900 / 628  
Percentage / Grade 70

Controller of Examinations

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



(B.Ed)

P-19

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD

Serial No. 413497

Name RANI GUL  
Father's Name DIL DAR TANOLI  
Address MUSTAFA TRADERS PARHANA RD KHAKI DILDAR  
TANOLI P/O KHAKI NEAR BY DOBBY MOSQUE  
Tehsil HANSEHRA  
District HANSEHRA  
has successfully completed BACHELOR OF EDUCATION (B. ED)

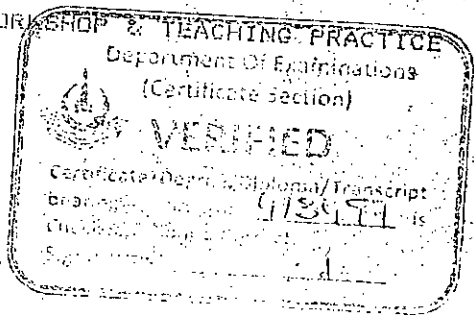
Roll No. AJ662484  
Registration No. 04NMA0058  
Final Semester SPR-2012

B-Ed

P-19

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 11	0513	SCHOOL ORGANIZATION	100	58
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	64
SPR- 11	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	69
SPR- 11	0651	ENGLISH (COMPULSORY)	100	61
AUT- 11	0517	TEACHING OF PAKISTAN STUDIES	100	55
AUT- 11	0658	TEACHING OF URDU	100	67
SPR- 12	0512	PERSPECTIVES OF EDUCATION	100	52
SPR- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	71
SPR- 12	0655	WORKSHOP & TEACHING PRACTICE	100	79



Attested

Muhammad Arshad Khan Tanol  
Advocate High Court  
Office No 33 Adjacent

CREDITS: 5

Total Marks / Obtained

900 / 576

Result Declared on JANUARY 04, 2013

Percentage / Grade

64 B

Date of issue JANUARY 18, 2013

Disclaimer:

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

Controller of Examinations

C.T

P-2  
Ann

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
RESULT INTIMATION CARD

Serial No. 42543  
Registration No. 04MMA0058  
Roll No. 0588305

C.T

Certified that Mr/Ms. RANI GUL  
Father's Name DIL DAR TANOLI  
has Successfully Completed the CERTIFICATE OF TEACHING  
programme. The detail of course is as under

Address:- DELDAR TANOLI P/O KHLEI WEAR BY ROHRY MOSQUE, HANSENRA DIST, HANSENRA

Semester	Course Code	Title of the Course	Marks	
			Maximum	Obtained
SPR-04	0631	DIMENSIONS IN EDUCATION	100	66
SPR-04	0632	EDUCATIONAL PSYCHOLOGY	100	56
SPR-04	0633	SCHOOL ORGANIZATION	100	57
SPR-04	0634	TEACHING STRATEGIES & EVALUATION	100	79
AUT-04	0604	URDU LANGUAGE AND ITS TEACHING	100	74
AUT-04	0605	SOCIAL STUDIES & ITS TEACHING	100	60
AUT-04	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	74
AUT-04	0634	ENGLISH AND ITS TEACHING	100	54
AUT-04	0635	ISLAMIAT AND ITS TEACHING	100	64

Department Of Examinations  
(Certificate Section)  
**VERIFIED**  
Certificate/Degree/Diploma/Transcript  
bearing Sr. No. 42543 is  
Checked & Found Correct.  
Signatures: \_\_\_\_\_

Attested  
Muhammad Arshad Khan Tahir  
Advocate High Court  
Office No. 33 Adjacent to  
Dist Bar

5/5/5  
Hani  
Tanja

Total Credit Hours 34  
Total AIU Credits 5  
Result declared on November 21, 2005  
Date of Issue: December 2, 2005

Total Marks Obtained 90 / 584  
Percentage Marks 65 %  
CGPA  
Controller of Examinations

Note: This result card is issued as a notice only; errors and omissions are excepted. An entry appearing in it does not in itself confer any right or privilege independently to the grant of proper certificate/degree which will be issued under the Regulations in due course of time.

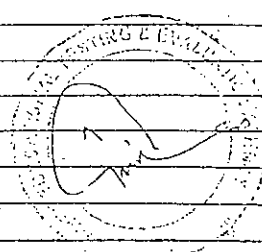


TAT-1 FEMALE MANSEHRA RESULT 2011

T- 22  
 Annex 1

Roll N	Name	Father Name	Marks	%age
1703103	ZARIA BIBI	M FARIQ	48	Fail
1703104	SUMERA KHURSHID	M ANWER SHAH	56	Fail
1703105	FARHAT	ABDUL KHALIQ	72	Fail
1703106	BIBI GULSHAN	AURENGZEB	24	Fail
1703107	NABEELA BASHEER	ABDUL HAMID	88	Fail
1703108	BIBI GUL	M M TARIQ	84	Fail
1703109	SAMINA BIBI	KHALID ROSHAN	72	Fail
1703110	RANI GUL	ABDUL SATAR SHAH	176	58.67
1703111	AMINA BIBI	M ISMAIL	92	Fail
1703112	BUSHRA RASHID	GULZAR HUSSAIN SHAH	104	Fail
1703113	BUSHRA JAVAID	DILDAR	112	Fail
1703114	MEHWISH		108	Fail
1703115	ALMAS		156	52.00
1703116	Mariam Bibi		132	44.00
1703117	Nosheen		64	Fail
1703118	Sobia		48	Fail
1703119	SOBIA		80	Fail
1703120	BIBI		108	Fail
1703121	BIBI		108	Fail
1703122	Fozia Bibi		136	45.33
1703123	SAIQABIBI		108	Fail
1703124	FARHATNAZ		164	54.67
1703125	LUBNAASHRAF		124	41.33
1703126	ANEESA		112	Fail
1703127	TAHIRAPARVEEN		64	Fail
1703128	ZAHIDABIBI		124	41.33
1703129	AZEEM		76	Fail
1703130	B		188	62.67
1703131	SANIASARW		112	Fail
1703132	SAHIBZADIAZMATRABBAN		128	42.67
1703133	???		68	Fail
1703134	?		128	42.67
1703135	KOUSAR		116	Fail
1703136	SADIKANWAL		96	Fail
1703137	SAMEENAFARMAN		128	42.67
1703138	AMMAHAMEED		80	Fail
1703139	SAIQARAFIQ		104	Fail
1703140	MAJIDABIBI		88	Fail
1703141	MAZLOOMA		124	41.33
1703142	SHABNAM		112	Fail
1703143	BIBIANIQARANI		60	Fail
1703144	SHAHNAZ		44	Fail
1703145	SH?SHADBEGUM		52	Fail
1703146	FOZIABIBI		116	Fail
1703147	SEHRASH		92	Fail
1703148	NABEE?		80	Fail
1703149	FA?ZA		100	Fail
1703150	RUBANAGUL		136	45.33
1703151	TAHIRABIBI		76	Fail
1703152	SA?PHALEEMA		116	Fail
1703153	SAMINAREHMAN		128	42.67
1703154	BIBIMARYAQAZI		116	Fail
1703155	NAHEEDABIBI		68	Fail
1703156	NAZIABIBI		64	Fail
1703157	NAILABIBI		168	56.00
1703158	NOREEN		76	Fail
1703159	?		152	50.67

R.NO  
 3110



Attested  
 Advocate Arshad Khan Tanoli  
 Advocate High Court  
 Office No 33 Adjacent to  
 District Jail Mansehra

16

P-23  
Annex-1

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

As approved by the Departmental Selection Committee and on the verification of the documents from the concerned authorities, the Competent Authority has been pleased to appoint the Miss: Rani Gul D/O Dildar Tanoli R/O Mansehra as PST against vacant posts at GGPS Miankhani BPE-7 @ Rs.5300-320-15400 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. He/she will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GP Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (DDO E&S Mansehra)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. His/her services are liable to termination on one month prior notice from either side in case of resignation without prior notice, his/her one month pay/allowances if any shall be forfeited to Government Treasury.

*M. Arshad*  
*M. Arshad*  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
District Jail Mansehra

8.334  
2307

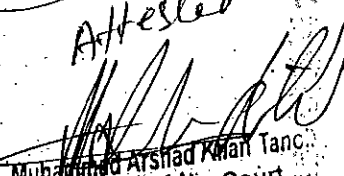
P-24

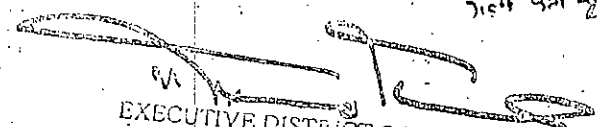
- 9. His/her services can be terminated at any time in case his/her performance is found unsatisfactory; he/she will be proceeded against under the removal from service under E&D Rules 2011.
- 10. He/she should produce Age & Health Certificate from the MS DHQ Hospital Manshara.
- 11. He/she may not be handed over the charge if his/her age is above 35 years and below 18 years.
- 12. The Candidates who are working as regular before 1<sup>st</sup> July 2001 in pervious post, his/her entitled for pension / gratuity etc.
- 13. No. TA/DA etc is allowed.
- 14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)  
 EXECUTIVE DISTRICT OFFICER  
 E&S EDU: MANSEHRA


Endst: No. 1170-29 / Estt: Apptt: PST//2011-12 Dated Manshara the 29/6 2012

- Copy to the:-
- 1. Secretary to Govt: of KPK E&SE Department Peshawar.
  - 2. Director E&SE Department KPK Peshawar.
  - 3. District Accounts Officer, Manshara.
  - 4-5. District Officer (M&F) Local Office.
  - 6-7. Deputy District Officer (Female & Male) E&SE Manshara.
  - 8. PA to District Coordination Officer, Manshara.
  - 9. Budget & Accounts Officer, local office, Manshara.
  - 10. Candidates concerned.

Attested  
  
 Muhammad Arshad Khan Tanc  
 Advocate High Court  
 Office No: 33 Adjacent  
 Dist Bar Abbottabad

  
 EXECUTIVE DISTRICT OFFICER  
 E&S EDU: MANSEHRA

order issued by the EDO Umar Khan Kundi  
 where by CM No: 434A in WP No: 592-A  
 2013  
 Honourable highcourt directed that pay  
 released by petitioner, hence the  
 order is verified for pay purposes

  
 30/12/13

P-25  
A Manshra

Manshra

S# : 1

P Sec:001 Month:April 2015  
MA7044 -Dy D O (F) Pry Edu Mansehr  
Min: Education Schools  
NTN:  
GPF #:  
Old #:

Pers #: 00712174 Buckle:  
Name: RANI GUL  
Dsg.: PRIMARY SCHOOL TEACHER  
CNIC No.1350368607390  
GPF Interest Applied

12 Vocational Temporary

MA7044 -

PAYS AND ALLOWANCES:

5002-Adjustment House Rent	1,306.00
5012-Adjustment Medical All	1,200.00
5309-Adj. 15% Adhoc Allowance	1,200.00
5898-Adj. Adhoc Allowance 50%	2,177.00
5911-Adj. Adhoc Relief 2011	653.00
5938-Adj. Adhoc Relief All 2012	1,600.00
5950-Adj. Adhoc Relief All-2014	800.00
5801-Adj Basic Pay	8,000.00

Gross Pay and Allowances

16,936.00

DEDUCTIONS:

4200-Professional Tax

Subrc:

100.00

Total Deductions

100.00

16,836.00

D.O.B  
24.06.1984  
02 Years 10 Months 006 Days

LFP Quota:  
HABIB BANK LIMITED SHINKIARI ROAD, MANS  
7900259303

Attested  
*[Signature]*  
Muhammad Arshad Khan  
Advocate High Court  
Office No 33 Adjacent to  
[illegible]

S#: 1

Manshra

Pers #: 00712174

Buckle:

Name: RANI GUL

Dsg.: PRIMARY SCHOOL TEACHER

CNIC No. 1350368607390

GPF Interest Applied

12 Vocational Temporary

PAYS AND ALLOWANCES:

5002-Adjustment House Rent  
 5011-Adj Conveyance Allowance  
 5012-Adjustment Medical All  
 5309-Adj. 15% Adhoc Allowance  
 5898-Adj. Adhoc Allowance 50%  
 5911-Adj. Adhoc Relief 2011  
 5938-Adj. Adhoc Relief All 2012  
 5950-Adj: Adhoc Relief All-2014  
 5801-Adj Basic Pay  
 Gross Pay and Allowances

DEDUCTIONS:

P Sec: 001 Month: May 2015  
 MA7044 - Dy D O (P) Edu Mansehr  
 Min: Education Schools  
 NTN:  
 GPF #:  
 Old #:

P-2  
 Annex  
 (32-1)

MA7044

1,306.00  
 2,856.00  
 1,200.00  
 1,200.00  
 2,177.00  
 653.00  
 1,600.00  
 800.00  
 8,000.00  
 19,792.00

Subrc:

Total Deductions

0.00

19,792.00

D.O.B  
 24.06.1984  
02 Years 11 Months 007 Days

LFP Quota:  
 HABIB BANK LIMITED SHINKIARI ROAD, MANS  
 7900259303

*Attested*

*[Signature]*  
 Advocate High Court  
 Office No 33 Adjacent to



Pay Roll for June 2015

P.272

SN: 1

Members

P Sec: 001 Month: June 2015  
MA7044 - By D O (P) Fry Eju Manshr  
Min: Education Schools  
NTN:  
GPF #:  
Cid #:

Pers #: 00712174 Buckler  
Name: RANI GUL  
Dsg.: PRIMARY SCHOOL TEACHER  
CNIC No. 1350368607390  
GPF Interest Applied

PAYS AND ALLOWANCES		MA7044
5002-Adjustment house rent		1,305.00
5011-Adj Conveyance Allowance		2,858.00
5012-Adjustment Medical All		1,200.00
5309-Adj. ISL. Adhoc Allowance		1,200.00
5898-Adj Adhoc Allowance 50%		2,177.00
5911-Adj Adhoc Salary 20%		853.00
5908-Adj Adhoc Salary All 10%		1,600.00
5950-Adj Adhoc Salary All-20%		200.00
5801-Adj Basic Pay		8,000.00
Gross Pay and Allowances		19,792.00

DEDUCTIONS:

Subtr:

Total Deductions

0.00

19,792.00

03 Years 00 Months 006 Days

D.O B

24.06.1984

LFP Quota:

HABIB BANK LIMITED SHINKIARI ROAD, MANS  
7900259303

03 years 00 Months 006 Days

Attested  
*[Signature]*  
Mohammad Arshad Khan Farooq  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar Association

# Election duty 2013

P 28

A sheet = F

## OFFICE OF THE RETURNING OFFICER

National Assembly -20  
 May 2013 Khyber Pakhtunkhwa-56  
 No: 127

Date: 27 May 2013

### OFFICE MEMORANDUM

In pursuance of the provisions of section 9 of the Representation of the People Act, 1976, the following appointment of Presiding Officer Assistant Presiding Officers Polling Officers are hereby made.

At Polling Station 301 Government Girls Middle School Chinar Kot (Combined) for election to the National Constituency No: NA-20 Manshira-I, PK-56, Manshira-IV.

To be held on the 11<sup>th</sup> May 2013.

Name & designation of presiding officer	Name & designation of Assistant presiding officer	Name & designation of polling officer	Name of assistant presiding officer designated as presiding officer
Doctor Muhammad Shahid SMO-RHC Chatter Plain 03005643037	1. Taj Malook CT Chatter Plain 03335051827	1. Awanig Zohra PST GGPS Dheri Haleem 033358562487	Taj Malook CT Chatter Plain
	2. Rasheed Ahmad TF GHS Ichrian 03335025994	2. Mubayyid Haroon PST GGS Dheri Haleem 033356127189	
	3. Mati-ur-Rehman TF GHSS Battal 0345597057	3. Rana Gul PST GGPS Land 03455365857	
	4. Ghafar Shah Qari GHSS Battal 03025256252	4. Sarfaraz PST GGS Kot 03005643037	
	5. Zahida CT GGMS Banda Gesuch 03479843883		
	6. Salma DM GGMS Banda Gesuch 03125753884		
	7. Nelofar PST GGPS Kot 03439557797		
	8. Gulshan PST GGPS Single Kot 03348351299		

Attested  
 Muhammad Arshad Khan  
 Advocate High Court  
 Office No 33 Adjacent to  
 Dist Bar Ahle

Note: The Presiding Officer is directed to bring his two passport size photographs and to make sure the attendance of polling staff positively within time.

Training: 17/04/2013 (For Males P.O. and A.P.O. only)

Enrolment: 28/04/2013 (For P.O. and A.P.O.)

Polling Officers (Male): 04.05.2013 Female Polling Officers: 05.05.2013

Venue: Government Commerce College & Management Sciences, Manshira.

Returning officer  
 PK-56 Manshira-IV  
 Place:

Returning Officer  
 NA-20 Manshira-I  
 Place:



Election Wavy  
2015

P-9

OFFICE OF THE RETURNING OFFICER,  
MALIKPUR(32),BAFFA(33),SHOUKATABAD(34)  
& TRANGRI SABIR SHAH(35) MANSEHRA.

No: DPS & PCC/Elec. 2015/ 76

Dated: 12/5/2015

### OFFICE MEMORANDUM

In pursuance of the provision of rule 11 of the Khyber Pakhtunkhwa Local Councils (Conduct of Elections) Rules, 2014, the following appointments of Presiding Officer/Assistant Presiding Officers/Polling Officer are hereby made

Polling Station GGHSS Baffa Kalan (Female) (Polling Station No. 16)

Ward: Baffa

Neighbourhood Council:- Baffa Kalan

#### Presiding Officer

S.No	Name	Designation	School/Deptt.	Contact No
1	Nazia Abbasi	SS	GHSS Phulra	03219814901

#### Assistant Presiding Officers

S.No	Name	Designation	School /Deptt.	Contact No
1	Noreen Maan	Sr. PET	GGHSS Murad Pur	3003574546
2	Perveen Akhter	Sr. CT	GGHSS Murad Pur	3450572880
3	Attia Gul	Sr. PST	GGCMS FAQIR ABAD TAJAL	
4	Bibi Shaheen	Sr. PST	GGCMS FAQIR ABAD TAJAL	
5	Saima Naz	SST-Gen	GGCMS FAQIR ABAD TAJAL	
6	Riffat Ara	PSHT	GGPS GULI BAGH	
7	Gulnaz	PSHT	GGPS Anyatabad	0345-9628949
8	Rani Gul	PST	GGPS Lammi Battal	0300-7059470

Note: In case of emergency APO at S. No. 1, will act as Presiding Officer.

#### Polling Officers

S.No	Name	Designation	School /Deptt.	Contact No
1	Bibi Zahida Mahjabeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
2	Sameena Tamkeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
3	Tehmina Gul	PSHT	GGPS MANSEHRA NO.3	3155819465

### TRAINING SCHEDULE

Date	Time	Venue
23-05-2015	8:30 am	Government Higher Secondary School No. 1 Mansehra.

Please ensure your attendance in the training.

Attended  
  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Mansehra

OFFICE OF THE DISTRICT EDUCATION OFFICER ( FEMALE ) MANSEHRA.

No. 2926/DE/1100

Dated 01/10/2014

P-30  
Annex C

SHOW CAUSE NOTICE.

Muhammad Sadaq, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, do hereby advise you Mst. Rani Gul, P.T. GGPS, Monjani, Mansehra as follows:

1. You were illegally appointed as P.T. at GGPS Monjani, vide defunct Executive District Education Officer (E&SE) Mansehra Endst: No. 1170-79 /Aptt./PST/F/ dated 20.6.2012, whereas you was stranger for recruitment process initiated through EATA, you never appeared in selection process as a candidates for said post through EATA your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then CDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)I & S/D/A 17/2013 Umar Khan LDO BS-19 dated 25.8.2014. More over the then EDO (E&S) removed from Government Service in connection with all such bogus appointment including you made by him.

2. Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defense before the inquiry committee:

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

- Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- Inflicted huge financial losses to the Govt Treasury receiving pay and result of bogus appointment.
- By snatching established rights of the deserving candidates due for appointment on merit. Cheating /cancelling the facts for unlawful appointment with collusion of then EDO.

- As a result thereof, I as competent authority, have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- You are, hereby, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.
- A copy of relative page of the finding of the inquiry committee is enclosed.

Mst. Rani Gul, PST  
GGPS Monjani.

Attested

COMPETENT AUTHORITY

District Education Officer  
(Female) Mansehra

Muhammad Arshad Khan Tanoh  
Advocate High Court  
Office No 33 Adjacent to  
Dist. Bar Association



P-31  
A Mansehra

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

Where as Mst Rani Gul D/O Dildar Tanoli working as PSI/GHS/GGM/GGP/Manjani was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt. Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice

1- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Executive District Officer Elementary and Secondary Education Mansehra.

i) Syed Hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)

ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.

3- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy

4- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.

5- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt. Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt. Services upon Mst Rani Gul D/O Dildar Tanoli PSI/GHS/GGM/GGP/Manjani

*[Handwritten Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

Inst: No. 1946-55TAE / Estab: dated 27/03/2011  
Copy to the:

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra
6. Principal/Headmistress \_\_\_\_\_
7. SDEO(F) Mansehra
8. Budget and Accounts Officer Local Office.
9. Mst: \_\_\_\_\_
10. Office File.

*[Handwritten Signature]*  
DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

Attested  
*[Handwritten Signature]*  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Dist. Court Mansehra

P-32

P-32

Annex-J

*[Handwritten signature]*

The Director,  
Elementary & Secondary Education,  
Government of Punjab, Lahore

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION  
ISSUED UNDER ENDORSEMENT NO. \_\_\_\_\_ DATED 3<sup>RD</sup> MARCH 2015  
BY THE DISTRICT OFFICE, DISTRICT OFFICIAL FROM GOVERNMENT SERVICE  
WAS IMPOSED UPON THE APPELLANT IN A HIGH  
CAPRICIOUS/WHIMSICAL MANNER WITHOUT LAWFUL AUTHORITY.  
COPY OF THE IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS  
ANNEX "A".

THE SAID IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM  
THE DATE OF ITS ISSUANCE DEPRIVING THE SAME WITHOUT LAWFUL  
AUTHORITY CONTRADICTORY TO THE RECRUITMENT POLICY & RULES  
OF THE GOVT. SERVICE AND ALL BACK BENEFITS AT THE SAME  
DATE.

THE APPELLANT SUBMITTED THE FOLLOWING FACTS IN  
SUPPORT OF HIS CLAIM OF ABUSE OF POWER ON THE PART OF AUTHORITY I.E DFO  
MANSHERA.

That the then Executive District Officer (ESO) Manshera invited  
the appellants and other candidates of various cadres in District  
Manshera to apply for the post of PST, MASHRAQ.

That a pole procedure application for the post of PST being a  
qualified teacher having D.T., B.T. & A.T. and E.T. Test was conducted  
on 20/07/11 and the appellants were registered as a candidate under Roll  
No. \_\_\_\_\_

That the then DFO conducted an interview and scrutinized the documents  
of the appellants, but the appellants and the candidate was displayed for  
relevant documents. After the official process the meeting of DSC was  
held on \_\_\_\_\_

*[Handwritten signature]*  
Muhammad Arshad Khan Qader  
Advocate High Court  
Office No. 33 Adjacent to  
Jett, Rawalpindi

P-33

held and approved the case of PST candidates for appointment against the vacant posts of PST.

That appointment order of the appellant was issued under endorsement No.1120-29/Estt: Apptt:PST/2011-12/ dated 20/06/2012 and appellant was posted at GGPS Monjhani Circle Shergarh. Copy attached, and then transferred from GGPS Monjhani to GGPS Hari Nakka and then GGPS Tandi Battal.

That appellant continuously performing her duty without any break for the last 03 year 08 months while she received a show cause notice whereby allegations were leveled against the appellant based on concoction, baseless & concealment of facts. (Copy attached)

That a comprehensive reply was submitted in response of the show cause notice wherein appellant admitted continuation that she was appointed after due recruitment process and her appointment order along with others candidates was issued in a lot after the approval of DSC.

That appellant received impugned order dated 3rd March 2015, whereas the major penalty of dismissal from service has been imposed upon the appellant.

That the appellant has been awarded with qualification i.e., PTC, Cf, and Govt Serv with good marks in the degree and certificates were also get verified from the concerned University / Board / Institutions by the District Officer (Female) Copy attached.

That the appellant was not paid any salary after her appointment up to one year, despite of several appeals and applications to the District Officer, she submitted her appeal to the Honourable High Court Abbottabad for release of her salary.

That on the High Court Abbottabad had order to the District Officer (D.O) for release of the salary of appellant with the remarks that the appellant is regular Government Servant in Education Department and her salary be released. Vide of Para.592-A/2013 (Copy attached)

Muhammad Arshad  
Advocate High Court  
Office No. 33 Adjacent to  
District Office Abbottabad

P-34  
A-11

Appellant was appointed after due process of recruitment through ETA test and appointment order was issued after the approval of DSC on appeal submitted by the appellant to the EDO. The appellant served as regular teacher in Education Department for the last 2 years and 08 months and no action was taken and show-cause was served neither asked for any irregularities nor personal hearing during the Probation period.

(i) No inquiry was conducted or initiated, no opportunity of defense was offered, no personal hearing was made, how the authority was passed in the light of rules under what charges/ evidence imposed such a harsh punishment.

The inquiry regarding illegal appointment was made against the then EDO not against the candidates/teachers. (The finding of the enquiry is attached)

The inquiry was made and in the finding no recommendation was issue for the termination of teachers, they only recommended the appointing authority for lesser punishment as one step down or 2 increments deduction.

The Education Officer has debarred all the teachers from service after 10 years, which is absolutely against the human rights and against the justice.

In the light of the above facts, it is humbly requested that to set aside the debarment order, termination that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station.

Attested  
Mohammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Jail Bar Abbottabad

Ranj Gul PST D/O Dildar  
Mohallah Near Braff Khana, Pakhwal  
Road  
PO, Mansehra Tehsil & District  
Mansehra  
CNIC No. 13503-3860739-0  
10/3/2015



P-35

P-35  
Annex 1

LEOPARDS COURIER SERVICES PVT. LTD.

From: *Rafiq Khan* To: *57308275 Pd Z*

To: *Rafiq Khan*

From: *Rafiq Khan*

CASH  NO DECLARED VALUE  DATE *10-10-11* TIME *10:30*

Pieces

Weight

Price Inclusive of G.S.T. 12-00-9808-001-91

SIG. *[Signature]*

\*Leopards\* Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed All the Conditions Printed on Reverse

For Suggestions/Complaints Contact info@leopardscourier.com  
Now Send Gifts To Your Loved One's By Leopards Loveline  
www.leopardscourier.com

*Attested*

*[Signature]*  
Advocate High Court  
Office No: 33 Adjacent

BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR

In the matter of  
Appeal No. 746/2015

RANI GUI..... (Applicant)

Versus

Govt of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar and others.....  
(Respondents)

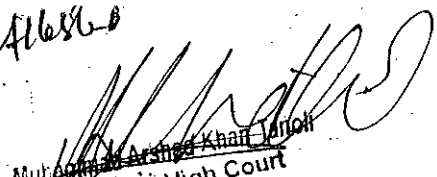
Application for permission for filling amended  
appeal in view of the Modification in the final  
order i.e conversion of penalty from dismissal  
to removal from service vide order dated  
25.08.2015.

Respectfully Submitted:

1. That the above noted appeal is pending adjudication before this Honorable Tribunal and is fixed for hearing on 21.01.2016, at Camp Court Abbottabad.
2. That the appellant request for allowing necessary amendment in the following manner inter alia on the following grounds:-

Grounds of Application

- A. That the appellant has in the titled appeal challenged the order dated.03.03.2015, vide which she has been dismissed from service. Before approaching the Honorable Tribunal, the appellant also submitted the mandatory departmental appeal on 10.03.2015, however the same was not responded till 90 days, hence the appellant filed the titled appeal.

*Arshad*  
  
Mulla Arshad Khan Jarrahi  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar

B. That now during the pendency of the titled appeal the Appellate authority has issued notification dated 25.08.2015, whereby the departmental appeal of the appellant has been rejected, however her Penalty order issued by the D.E.O. Female, Mansehra vide order dated 03.03.2015, is modified to the extent of conversion of Penalty of dismissal into Removal from service. (Copy of the order dated 25.08.2015, is attached)

P-37

C. That in light of the said modification and to avoid future complications, it is necessary to amend the titled appeal to the extent of challenging the order dated 25.8.2015.

D. That there is no legal impleadment in allowing such permission, rather the interest of justice would best be served.

*It is, therefore, humbly prayed that on acceptance of the instant application the appellant may please be allowed to file amended appeal in view of the issuance of final order whereby the penalty of dismissal from service was converted to removal from service vide order dated 25.08.2015.*

Appellant

Through

Abdul Saboor Khan

&

Malik Ishfaq Ahmad Jilani  
(Advocates, High Court)

**Affidavit.**

I do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal.

**ATTESTED**

Dated: \_\_\_/11/2015

Deponent



Attested

Muhammad Arshad Khan  
Advocate High Court  
Office No: 33 Adjacent to  
District Bar Association

کورٹ فیس قیٹی

# وکالت نامہ

بعدالت Service Tribunal Welle Peshawar

عنوان: MST Rani Gul Court etc بنام

منجانب: Appellant

نوعیت مقدمہ: Service Appeal

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام

Muhammad Arshad Khan Tanoli

Advocate High Court

Office No: 33 Adjacent to

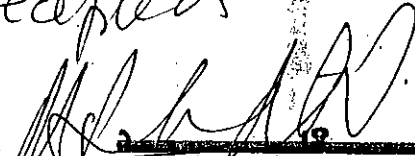
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا خالص اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المترقوم:

بمقام:

Accepted



M. Arshad Khan  
Tanoli Adv.

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
District Court Abbottabad

Rani Gul

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

Amended Appeal No. \_\_\_\_\_/2016

Mst. Rani Gul, PST, Tehsil & District, Mansehra.

...APPELLANT

**VERSUS**

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

**AMENDED SERVICE APPEAL**

**INDEX**

S.#	Description	Page No.	Annexure
1.	Amended service appeal along with affidavit	1 to 12	
2.	Copies of educational record	13-20	"A"
3.	A copy of advertisement	21	"B"
4.	Copies of E.T.A test result	22-	"C"
5.	Copy of appointment letter	23-24	"D"
6.	Copy of pay slip	25-27	"E"
7.	Copy of the letter of election duty	28-29	"F"
8.	Copy of show cause notice	30	"G"
9.	Copy of reply		"H"
10.	Copy of impugned order dated 03/03/2015	31-	"I"
11.	Copy of departmental appeal and receipt	32-35	"J"
12.	Copy of rejection order dated 26/04/2016		"K"
13.	Copy of application and order dated 26/04/2016	36-37	"L"
14.	Wakalatnama	38	

*Rani Gul*  
...APPELLANT

Through

Dated: \_\_\_\_\_/2016

*(Muhammad Arshad Khan Tanoli)*  
Advocate High Court, Abbottabad

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Distt. Bar Association

1

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

Amended Appeal No. \_\_\_\_\_/2016

Mst. Rani Gul, PST, Tehsil & District, Mansehra.

...APPELLANT

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer, Elementary & Secondary Education (Female), District Mansehra.

...RESPONDENTS

**AMENDED APPEAL** UNDER SECTION 4 OF  
THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE  
IMPUGNED ORDER DATED 03/03/2015 AND  
REJECTION ORDER DATED 25/08/2015  
WHICH WAS PASSED BY THE  
DEPARTMENT AFTER APPEAL FILLED IN

TRIBUNAL WHEREBY THE  
DEPARTMENTAL APPEAL OF APPELLANT  
AGAINST THE ORDER OF DISMISSAL FROM  
SERVICE HAS BEEN REJECTED FOR NO  
GOOD GROUNDS, HOWEVER DISMISSAL  
ORDER IS CONVERTED INTO REMOVAL  
FROM SERVICE.

-----  
**PRAYER:** ON ACCEPTANCE OF THIS  
APPEAL, THE IMPUGNED ORDER DATED  
03/03/215 AND 25/08/2015 MAY BE SET  
ASIDE AND THE APPELLANT MAY BE  
REINSTATED INTO SERVICE WITH ALL  
BACK AND CONSEQUENTIAL BENEFITS.  
ANY OTHER RELIEF WHICH THIS  
HONOURABLE TRIBUNAL DEEMS FIT AND  
PROPER THAT MAY ALSO BE GRANTED TO  
THE APPELLANT.

-----

Respectfully Sheweth;-

1. That the appellant is resident of village  
khaki (Union council Bherkhund, Tehsil &  
District, Manshira District Manshira. That

the appellant is fully qualified and having the required documents/certificates. (Copies of educational record are attached as Annexure "A").

2. That the District Education Officer, Mansehra/respondent No. 3 advertised some vacancies in Daily Mashriq. (A copy of advertisement is attached as Annexure "B").
3. That, as per procedure, the appellant applied for the post of PST being a qualified teacher having required qualification. E.T.A test was conducted on 26/02/2011 and the appellant appeared as a candidate and obtained 176 marks out of 300 under roll No. 17013110. (Copies of E.T.A test result is attached as Annexure "C").
4. That then the EDO conducted interview and scrutinized the documents of the candidates, and merit list of the candidates was displayed for receiving objections. During the process, the appellant have submitted her appeal to the extent that her name was not in



the merit list whereas the appellant have properly applied and Roll No. was also issued to the appellant by the department/ ETEA. After the official process, the meeting of DSC was held and approved the case of appellant for appointment against the vacant post of PST and on the acceptance of the appeal by the competent authority the appointment order of the appellant was issued under Endst. No. 1120-29 Estt: Appt: PST/2011-2012 dated 20/06/2012 and the appellant was posted GGPS Monjhani in adjacent U/C and later on Transferred and adjusted at GGPS Hari Nakka Schools. (Copy of appointment letter is annexed as Annexure "D").

5. That the appellant performed her duties very honestly, regularly with devotion and dedication since the time of her appointment in above mentioned different school and also received her salaries, from June, 2012 to June 2015. (Copy of pay slip is attached as Annexure "E").

6. That the appellant was also directed to perform election duty during the general election duty 2013 & local election of 2015. (Copy of the letter of election duty is attached as Annexure "F").
  
7. That the appellant was continuously performing her duties without any break for the period for which the salaries were received and has never been found guilty of any kind of absence, misconduct, misfeasance, malfeasance or nonfeasance, nor been found guilty of dereliction of duty without taking these thing into consideration, the respondent No. 3 issued show cause notice to the appellant leveling baseless allegations against the appellant there in. (Copy of show cause notice is attached as Annexure "G").
  
8. That appellant properly submitted reply to show cause notice and denied all the alleged allegations therein. Copy of reply is attached as annexure "H".

9. That the appellant was also directed to perform exam duty as deputy superintendent March 2014 and Higher Secondary exam duty as a deputy superintendent 2015.
10. That the appellant's appointment was terminated through impugned dismissal order dated 03/03/2015 by imposing major penalty of dismissal from service. (Copy of impugned order dated 03/03/2015 is attached as Annexure "I").
11. That the appellant filed a departmental appeal against the order dated 03/03/2015 but the departmental appeal of appellant against the order of dismissal from service dated 03/03/2015 which was not responded within statutory period, then the appellant preferred a service appeal No. 745/2015 before the KPK service Tribunal Peshawar. (Copy of departmental appeal and receipt attached as Annexure "J").
12. That during the pendency of appeal the appellate authority has issued notification

dated 25/08/2015, whereby the departmental appeal of the appellant has been rejected however the appellant's penalty order issued by the DEO (Female), Mansehra vide order dated 03/03/2015 is modified to the extent of conversion of penalty of dismissal into removal from service. (Copy of rejection order dated 26/04/2016 is attached as Annexure "K").

13. That thereafter, the appellant filled an application for amendment of appeal which was allowed by the Honourable Tribunal vide order dated 26/04/2016. Hence the amended appeal on the basis of following grounds amongst others. (Copy of application and order dated 26/04/2016 are attached a annexure "L").

**GROUND:-**

- a. That the impugned order dated 03/03/2015 and 25/08/2015 are against the law, facts, norms of justice, arbitrary fanciful, perverse,

without lawful authority, based on malafide, unconstitutional and not maintainable and liable to be set aside.

b. That the service of the appellant was terminated on the fact that the appellant appointment was the result of misuse of the authority by the then EDO, Umer Khan Kundi such fact cannot legally be made base for removal from the service and same is the case of appellant. The appellant legally, as per the rule and policy of good governance and in the constitution could have not been penalized with major penalty for act.

c. That, however, the appellant's penalty order issued by the DEO (Female) Mansehra vide order dated 03/03/2015 is modified to the extent of conversion of penalty of dismissal into removal from service by showing

reason that the appointment of appellant is illegal.

d. That, perusal of first para of impugned show cause notice is self-explanatory and worth considering for reinstatement of the service of the appellant.

e. That there is no ill-gotten means against the appellant and section-20 of General Clause Act is not applicable to the case of the appellant because appellant has not been found guilty of any misconduct or procuring her service through any fraudulent means.

f. That in the light of authoritative decision/views of the superior judiciary including the Supreme Court of Pakistan, the service of the appellant could not have been terminated and the impugned order could not have been issued because where the authority is guilty of

irregularities, illegalities and procedural violations, the service of an employee cannot be terminated.

g. That the appellant has not been allowed fair opportunity of personal hearing, thus the appellant have been condemned unheard.

h. That no proper procedure has been followed before awarding appellant the major penalty, no proper inquiry has been conducted, the appellant have not been properly associated with the inquiry proceedings, statements of witnesses if any were never taken in the appellant presence nor the appellant have been allowed opportunity of cross examination, thus the proceedings so conducted are defective in the eye of law.

i. That on the acceptance of the appeal by the competent authority the appointment order of the appellant

was issued under Endst. No. 1120-29/Estt: Appt: PST/2011-2012 dated 20/06/2012 and the appellant was posted at GGPS Monjhani.

- j. That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, humbly prayed that on acceptance of this appeal, the impugned order dated 03/03/2015 and 25/08/2015 may be set aside and the appellant may be re-instated into service with all back and consequential benefits. Any other relief which this Honourable Tribunal deems fit and proper that may also be granted to the appellant.

*Ranif Gul*  
...APPELLANT

Through

Dated: \_\_\_\_\_/2016

*Muhammad Arshad Khan Tanoli*  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

**VERIFICATION: -**

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

...APPELLANT



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

Amended Appeal No. \_\_\_\_\_/2016

Mst. Rani Gul, PST, Tehsil & District, Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

**AMENDED SERVICE APPEAL**

**AFFIDAVIT**

I, Mst. Rani Gul, PST, Tehsil & District, Mansehra, do hereby solemnly affirm and declare that the contents of forgoing amended appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*Rani Gul*  
DEPONENT

Identified by;

*Muhammad Arshad Khan Tanoli*  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad  
Office No. 33 Adjacent to  
215 3rd Abbottabad



Roll No. 132338

S.S.C.

P-13

Board of Intermediate & Secondary Education ABBOTTABAD

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)



Session 2000 (Annual/Supplementary)

Annex-A

Name Ravi Gul

Father's Name P. I. Dar

Roll No. 3288

SUBJECT	Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. English	150	97	Five hundred & Twenty Eight
2. Urdu	150	03	
3. Islamiyat Comp.	75	83	
4. Pakistan Studies	75	48	
5. Gen. Mathematics	100	71	
6. General Science	100	63	
7. Art	100	68	
8. I.S.	100	57	
<b>Total</b>	<b>850</b>	<b>528</b>	<b>B</b>

SECRETARY  
BISE ABBOTTABAD

RESULT

This Certificate is issued errors and omission excepted.

Prepared by: Nasir

Checked by: [Signature]

[Signature]

Date \_\_\_\_\_ 2000

15 NOV 2000

Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Attested

[Signature]  
Muhammad Arshad Khan Janoli  
Advocate High Court  
Office No 33 Adjacent to  
District Jail Abbottabad

BOARD OF INTERMEDIATE & SECONDARY EDUCATION  
DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination

FOA

PA

14

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

Sr. No. Z1-7805.....

DETAILED MARKS CERTIFICATE  
Higher Secondary School Certificate Examination  
Part-II



Name: RANI GUL  
Father's Name: DILDAR  
Group: HUMANITIES

Session: 2003 (Supply)

Roll No: 3473

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks In Words
		Theory	Pract.	Theory	Pract.		
English	200	33	-	33	-	66	Sixty-Six
Urdu (Comp)	200	48	-	67	-	115	One Hundred Fifteen
Islamic Education	50	32	-	-	-	32	Thirty-Two
Pakistan Studies	50	-	-	17	-	17	Seventeen
Civics	200	40	-	51	-	91	Ninety-One
Islamic Studies	200	54	-	60	-	114	One Hundred Fourteen
Urdu (Advance)	200	33	-	56	-	89	Eighty-Nine
<b>Total: 1100</b>						524	Five Hundred Twenty-Four Only

RESULT VERIFIED  
HSSC SECRETARY  
17/07/2004

SECRETARY  
Board of Intermediate  
& Secondary Education  
Abbottabad

Remarks:

Checked By: \_\_\_\_\_  
Date: 31-January, 2004

Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Note: Errors / Omissions excepted

Attested

Muhammad Arshad Khan Janoll  
Advocate High Court  
Office No 33 Adjacent to  
Distt. Bar Abbottabad

BoA

10366/A/04

SNo: 3772

PA

P-18

# HAZARA UNIVERSITY, MANSEHRA, NWP, PAKISTAN



## DETAILED MARKS CERTIFICATE

### BA Supplementary 2005

Roll No: 06617 Registration No: 04-P-870

Student's Name: Rani Gul Father's Name: Dildar Tanoli

Institution/District: Mansehra Part: Second

10366/A/04  
 Page = 214/388  
 23/09/13

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. Part I Marks	285	145	One Hundred & Forty-Five	Pass
2. English Compulsory	75	25	Twenty-Five	Pass
3. Pakistan Studies	40	18	Eighteen	Pass
4. Urdu	75	44	Forty-Four	Pass
5. Islamic Studies	75	44	Forty-Four	Pass
<b>Total</b>	<b>550</b>	<b>276</b>		

Percentage 50.18 %  
 Division Second

Page 65/95  
 23/09/13

Prepared by: *M. Anwar Khan*  
 Checked by:

**VERIFIED BY**  
*M. Anwar Khan*  
 Controller of Examination  
 Hazara University, Mansehra

Controller Examinations  
 Hazara University, Mansehra  
 December 25, 2005

Attested

*M. Anwar Khan Tanoli*  
 Advocate High Court  
 Office No: 33 Adjacent to  
 Court for Mansehra

Note: Discrepancies in marks between this certificate and the original marks sheet shall be the responsibility of the student.

162

# HAZARA UNIVERSITY

M.A  
P-16

MANSEHRA, NWFP, PAKISTAN

SN: 1832

## DETAILED MARKS CERTIFICATE

### MASTER OF ARTS ( FINAL ) ANNUAL EXAMINATION 2010

Roll No: 31528 ✓  
 Name: Rani Gul ✓  
 Institution/ District: MANSEHRA  
 Reg No: 04-P-870 ✓  
 F/ Name: Dildar Tanoli ✓  
 Subject: Urdu

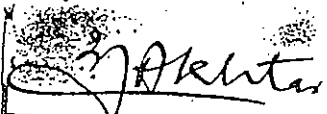
62744/A/07  
Page 2/14/154

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				235	TWO HUNDRED THIRTY-FIVE	
Poetry "Nazam"	100		46		46	FORTY-SIX	Pass
Qaseeda, Masuavi & Marsia	100		60		60	SIXTY	Pass
Iqbaliat	100		48		48	FORTY-EIGHT	Pass
Criticism	100		52		52	FIFTY-TWO	Pass
Essay	100		45		45	FORTY-FIVE	Pass
General Viva Voce	100		46		46	FORTY-SIX	Pass
<b>Total:</b>	<b>1100</b>				<b>532</b>	<b>FIVE HUNDRED THIRTY-TWO</b>	
<b>Percentage:</b>	<b>48.36</b>						
<b>Division:</b>	<b>SECOND</b>						


Print Date: 04-01-2011  
 Checked By: \_\_\_\_\_

Page 2/14/151  
 23/09/2013  
 Controller Examinations  
 Hazara University, Mansehra  
 January 04, 2011

Errors and omissions are subject to subsequent rectification.  
 Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

VERIFIED BY  
  
 Controller of Examination  
 Hazara University Mansehra

Attested

  
 Muhammad Arshad Khan  
 Advocate High Court  
 Office No: 33 Adjacent to  
 District Jail Mansehra

P-17

Confidential

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
DEPARTMENT OF EXAMINATIONS  
(Verification Section)

No. F. I-S/Verif/ 30056  
DISTRICT EDUCATION OFFICER (FEMALE)  
MANSEHRA

Dated: 06 Oct, 2013

*Signature*  
*23/10/13*  
*DEO*

Subject: VERIFICATION OF CERTIFICATE(S)/DEGREE(S)/DIPLOMA(S)/TRANSCRIPT/  
PRC ISSUED BY ALLAMA IQBAL OPEN UNIVERSITY

Dear Sir/Madam,

This is with reference to Letter No. 7193 dated 12 Sep, 13  
on the subject noted above. It is certified that Certificate(s)/Degree(s)/Diploma(s)/ Transcript/PRC issued by  
the University to the following students are correct:

Sr. No.	Student & Father's Name	Programme	Registration No.	Certificate/Degree/ Diploma/Transcript/ PRC No.
1	RANI GUL DIL DAR TANOLI	PTC	04-NMA-0058	141745
2	RANI GUL DIL DAR TANOLI	B.ED	04-NMA-0058	413497

*Signature*  
Assistant Controller of Examinations  
Certificate Section  
Allama Iqbal Open University  
Islamabad.  
*Signature*

*Attested*  
*Signature*  
Advocate High Court  
Office No 33 Adjacent to  
Islamabad

1757  
24/10/2013  
DEO  
Mansehra

Serial No. 141745

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD



Name RANI GUL  
Fathers's Name DIL DAR TANOLI  
Address DILDAR TANOLI P/O KHAKI  
NEAR BY BOMBAY MOSQUE  
Tehsil MANSEHRA  
District MANSEHRA

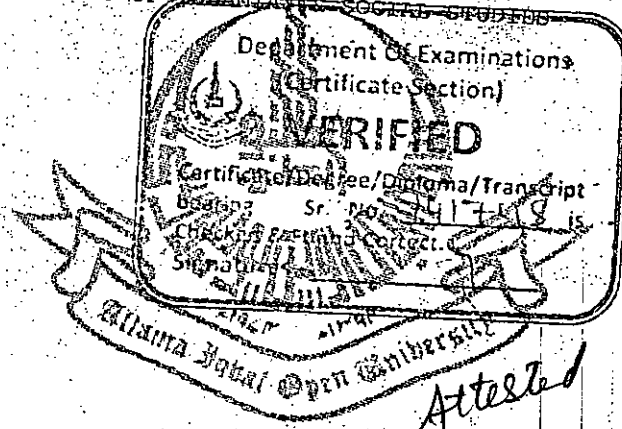
Roll No. U625053  
Registration No. 04NMA0058  
Final Semester AUT- 2006

has successfully completed PRIMARY TEACHING CERTIFICATE

P-18

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	68
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	76
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	62
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	78
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	80
AUT- 06	0617	TEACHING OF URDU	100	63
AUT- 06	0618	TEACHING OF MATHEMATICS	100	61
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	68
AUT- 06	0620	TEACHING OF ISLAMIC SOCIAL SCIENCES	100	62



Attested  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent

CREDITS: 5

Result Declared on SEPTEMBER 20, 2007

Date of issue SEPTEMBER 25, 2007

Total Marks / Obtained 900 / 628

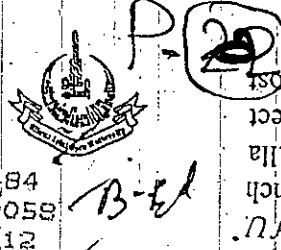
Percentage / Grade 70

Controller of Examinations

Disclaimer:

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

**(B.ED)**  
**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**PROVISIONAL RESULT CARD**



Serial No. 413497

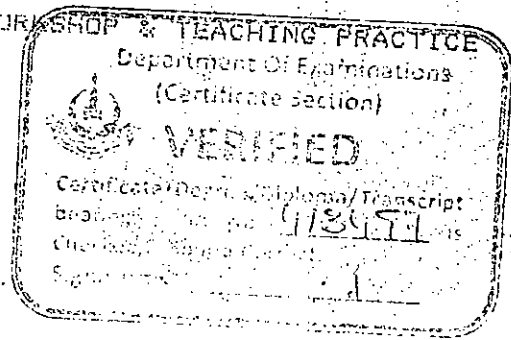
Name RANI GUL  
 Father's Name DIL DAR TANDLI  
 Address MUSTAFA TRADERS FARHANA RD KHAKI DILDAR  
 TANDLI P/O KHAKI NEAR BY DUMBY MOSQUE  
 Tehsil MANSEHRA  
 District MANSEHRA  
 has successfully completed BACHELOR OF EDUCATION (B. ED)

Roll No. AJ662484  
 Registration No. 04NMA0058  
 Final Semester SPR-2012

P-19

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 11	0513	SCHOOL ORGANIZATION	100	58
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	64
SPR- 11	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	69
SPR- 11	0651	ENGLISH (COMPULSORY)	100	61
AUT- 11	0517	TEACHING OF PAKISTAN STUDIES	100	55
AUT- 11	0658	TEACHING OF URDU	100	67
SPR- 12	0512	PERSPECTIVES OF EDUCATION	100	52
SPR- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	71
SPR- 12	0655	WORKSHOP & TEACHING PRACTICE	100	79



Attested

*Muhammad Arshad Khan Tanc*  
 Advocate High Court  
 Office No 33 Adjacent

CREDITS: 6

Total Marks / Obtained 900 / 576  
 Percentage / Grade 64 B

Result Declared on JANUARY 04, 2013

Date of issue JANUARY 18, 2013

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

**Controller of Examinations**



C.T

P-20  
Annex-A

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
RESULT INTIMATION CARD

Serial No. 42543  
Registration No. 04MMAG058  
Roll No. 0688305

C.T

Certified that Mr/Ms. RANI GUL  
Father's Name DIL DAR TANOLI  
has Successfully Completed the CERTIFICATE OF TEACHING  
programme. The detail of course is as under

Address: DILBAR TANOLI P/O. KILMI NEAR BY BOHNEY MOSQUE, HANSEHRA DIST. HANSEHRA

Semester	Course Code	Title of the Course	Marks	
			Maximum	Obtained
SPR-04	0631	DIMENSIONS IN EDUCATION	100	65
SPR-04	0632	EDUCATIONAL PSYCHOLOGY	100	55
SPR-04	0633	SCHOOL ORGANIZATION	100	57
SPR-04	0638	TEACHING STRATEGIES & EVALUATION	100	79
AUT-04	0604	URDU LANGUAGE AND ITS TEACHING	100	74
AUT-04	0605	SOCIAL STUDIES & ITS TEACHING	100	50
AUT-04	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	74
APR-04	0634	ENGLISH AND ITS TEACHING	100	54
APR-04	0635	ISLAMIAT AND ITS TEACHING	100	64

Department Of Examinations  
(Certificate Section)  
**VERIFIED**  
Certificate/Degree/Diploma/Transcript  
bearing Sr. No. 42543 is  
Checked & Found Correct.  
Signatures: \_\_\_\_\_

Attested  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Dist. Bar...

5/5/5  
Hani Tania

Total Credit Hours \*\*  
Total AIU Credits 5  
Result declared on November 21, 2005  
Date of Issue: December 2, 2005

Total Marks Obtained 93 / 584  
Percentage Marks 65 B  
CGPA \*\*

Controller of Examinations

Note: This result card is issued as a notice only; errors and omissions are excepted. An entry appearing in it does not in itself confer any right or privilege independently to the grant of proper certificate/degree which will be issued under the Regulations in due course of time.

**تھکرہ مواعیلات و تیسرات حکومت خیبر پختونخوا**

مذکورہ ذیل پوزیشنوں پر نوکریوں کی فراہمی کے لیے ایک ایجنسی کی ذمہ داری ہے۔

1. **Chief Officer (AO)** - 03 posts (02 posts reserved for SC/ST candidates)

2. **Assistant Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

3. **Deputy Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

Sl. No.	Post Name	Grade	Age Limit	Qualification
1	Chief Officer (AO)	GS-16	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 10 years experience in similar posts.
2	Assistant Commissioner (AO)	GS-15	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.
3	Deputy Commissioner (AO)	GS-14	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.

Sl. No.	Post Name	Grade	Age Limit	Qualification
4	Chief Officer (AO)	GS-16	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 10 years experience in similar posts.
5	Assistant Commissioner (AO)	GS-15	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.
6	Deputy Commissioner (AO)	GS-14	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.

**Pre Bid Meeting**

زیر ذیل کے دفتر میں مورخہ 21-05-2011 کو برت 11:00 بجے ایک میٹنگ منعقد ہوگی جس میں یونٹ کے نمائندوں سے اس کے متعلق فراہم کردہ اس بات پر بحث کی جائے گی کہ اس کے متعلق کیا اقدام کیا جائے اور اس کے متعلق کیا سفارشات دی جائیں۔ اس میٹنگ کے بعد اس کے متعلق ایک رپورٹ تیار کی جائے گی اور اس کے ساتھ ساتھ اس کے متعلق ایک قرارداد تیار کی جائے گی۔

1. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
2. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
3. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
4. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
5. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
6. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
7. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
8. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
9. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔
10. ٹینڈر نام کے سوسل کے لئے فرم کے پرنسپل یا کسی ایسے شخص کو مقرر کرنے کی درخواست تیار کرنے کی تاریخ 21-05-2011 تک ذمہ داری کو فرم کی ذمہ داری ہے۔

ایگزیکٹو چیف ایگزیکٹو آفیسر

0937-570861 فون

مذکورہ ذیل پوزیشنوں پر نوکریوں کی فراہمی کے لیے ایک ایجنسی کی ذمہ داری ہے۔

1. **Chief Officer (AO)** - 03 posts (02 posts reserved for SC/ST candidates)

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2	Assistant Commissioner (AO)	GS-15	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.
3	Deputy Commissioner (AO)	GS-14	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.
4	Chief Officer (AO)	GS-16	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 10 years experience in similar posts.
5	Assistant Commissioner (AO)	GS-15	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.
6	Deputy Commissioner (AO)	GS-14	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.
7	Chief Officer (AO)	GS-16	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 10 years experience in similar posts.
8	Assistant Commissioner (AO)	GS-15	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.
9	Deputy Commissioner (AO)	GS-14	45	B.A. / B.S. / B.Com. / B.E. / B.Tech. / M.A. / M.S. / M.Com. / M.E. / M.Tech. / M.Phil. / Ph.D. / 5 years experience in similar posts.

مذکورہ ذیل پوزیشنوں پر نوکریوں کی فراہمی کے لیے ایک ایجنسی کی ذمہ داری ہے۔

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5. **Assistant Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

6. **Deputy Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

7. **Chief Officer (AO)** - 03 posts (02 posts reserved for SC/ST candidates)

8. **Assistant Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

9. **Deputy Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

10. **Chief Officer (AO)** - 03 posts (02 posts reserved for SC/ST candidates)

11. **Assistant Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

12. **Deputy Commissioner (AO)** - 10 posts (05 posts reserved for SC/ST candidates)

ایگزیکٹو چیف ایگزیکٹو آفیسر

0937-570861 فون

Attested

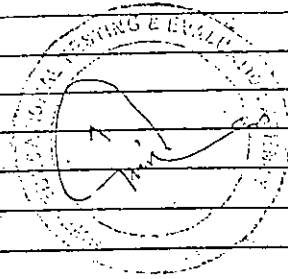
Muhammad Arshad Khan Sar...  
Advocate High Court  
Office No 33 Adjacent to...

TAT-1 FEMALE MANSEHRA RESULT 2011

P. 22.5  
Annex 2

Roll No	Name	Father Name	Marks	%age
1703103	ZARIA BIBI	M FARIQ	48	Fail
1703104	SUMERA KHURSHID	M ANWER SHAH	56	Fail
1703105	FARHAT	ABDUL KHALIQ	72	Fail
1703106	BIBI GULSHAN	AURENGZEB	24	Fail
1703107	NABEELA BASHEER	ABDUL HAMID	88	Fail
1703108	BIBI GUL	M M TARIQ	84	Fail
1703109	SARINA BIBI	KHALID ROSHAN	72	Fail
1703110	RANI GUL	ABDUL SATAR SHAH	176	58.67
1703111	AMINA BIBI	M ISMAIL	92	Fail
1703112	BUSHRA RASHID	GULZAR HUSSAIN SHAH	104	Fail
1703113	BUSHRA JAVAID	DILDAR	112	Fail
1703114	MEHWISH		108	Fail
1703115	ALMAS		156	52.00
1703116	Mariam Bibi		132	44.00
1703117	Nosheen		64	Fail
1703118	Sobia		48	Fail
1703119	SOBIA		80	Fail
1703120	BIBI		108	Fail
1703121	BIBI		108	Fail
1703122	Fozia Bibi		136	45.33
1703123	SAIQABIBI		108	Fail
1703124	FARHATNAZ		164	54.67
1703125	LUBNAASHRAF		124	41.33
1703126	ANEESA		112	Fail
1703127	TAHIRAPARVEEN		64	Fail
1703128	ZAHIDABIBI		124	41.33
1703129	AZEEM		76	Fail
1703130	B		188	62.67
1703131	SANI SARW		112	Fail
1703132	SAHIBZADIAZMATRABBAN		128	42.67
1703133	???		68	Fail
1703134	?		128	42.67
1703135	KOUSAR		116	Fail
1703136	SADIKANWAL		96	Fail
1703137	SAMEENAFARMAN		128	42.67
1703138	ANMAHAMEED		80	Fail
1703139	SAIQARAFIQ		104	Fail
1703140	MAJIDABIBI		88	Fail
1703141	MAZLOOMA		124	41.33
1703142	SHABNAM		112	Fail
1703143	BIBIANIQARANI		60	Fail
1703144	SHAHAZ		44	Fail
1703145	SH?SHADBEGUM		52	Fail
1703146	FOZIABIBI		116	Fail
1703147	SEHRASH		92	Fail
1703148	NABEE?		80	Fail
1703149	FA?ZA		100	Fail
1703150	RUBANAGUL		136	45.33
1703151	TAHIRABIBI		76	Fail
1703152	SA?PHALEEMA		116	Fail
1703153	SAMINAREHMAN		128	42.67
1703154	BIBIMARYAQAZI		116	Fail
1703155	NAHEEDABIBI		68	Fail
1703156	NAZIABIBI		64	Fail
1703157	NAILABIBI		168	56.00
1703158	NOREEN		76	Fail
1703159	?		152	50.67

R.NO  
3110



Attested  
Munir Ahmad Arshad Khan Tanoh  
Advocate High Court  
Office No- 33 Adjacent to  
Hall of the Government

16

P-23  
Akh-D

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

As approved by the Departmental Selection Committee and on the verification of the documents from the concerned authorities, the Competent Authority has been pleased to appoint the Miss: Rani Gul D/O Dildar Tanoli R/O Mansehra as PST against vacant posts at GGPS Monjhan in BPE-7 @ Rs.5300-320-15400 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. He/she will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GP Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned BDOs will be subject to the receipt of verified documents by the appointing authority / (BDO BISE Mansehra)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. His/her services are liable to termination on one month prior notice from either side in case of resignation without prior notice, his/her one month pay/allowances if any shall be forfeited to Government Treasury.

*M. A. Khan*  
*M. A. Khan*  
Muhammad Afshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
New Court Building

8.334  
8.303

P-24

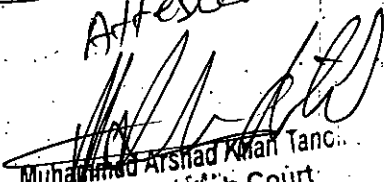
- 9. His/her services can be terminated at any time in case his/her performance is found unsatisfactory; he/she will be proceeded against under the removal from service under E&S Rules 2011.
- 10. He/she should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
- 11. He/she may not be handed over the charge if his/her age is above 35 years and below 18 years.
- 12. The Candidates who are working as regular before 1<sup>st</sup> July 2001 in pervious post, his/her entitled for pension / gratuity etc.
- 13. No. TA/DA etc is allowed.
- 14. Charge report should be submitted to all concerned in duplicate.


(Umar Khan Kundi)  
 EXECUTIVE DISTRICT OFFICER  
 E&S EDU: MANSEHRA

Endst: No. 1120-29 /Estt: Apptt:PST//2011-12 Dated Mansehra the 29/6 2012

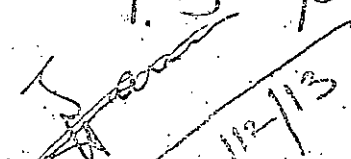
Copy to the:-

- 1. Secretary to Govt: of KPK E&SE Department Peshawar.
- 2. Director E&SE Department KPK Peshawar.
- 3. District Accounts Officer, Manshra.
- 4-5. District Officer (M&F) Local Office.
- 6-7. Deputy District Officer (Female&Male) E&SE Manshra.
- 8. PA to District Coordination Officer, Manshra.
- 9. Budget & Accounts Officer, local office, Manshra.
- 10. Candidates concerned.

Attested  
  
 Muhammad Arshad Khan Tanc  
 Advocate High Court  
 Office No: 33 Adjacent  
 Dist: 9ar Abbottabad

  
 EXECUTIVE DISTRICT OFFICER  
 E&S EDU: MANSEHRA

order issued by then EDO Umar Khan Kundi  
 where by CM No: 434A in WP No: 592-A  
2013 2013  
 honourable highcourt directed that pay  
 released by petitioner, hence the  
 order is varified for pay purposes

  
20/12/13

P-25  
A Manshras E

Manshra

S# : 1

P Sec:001 Month:April 2015  
MA7044 -Dy D O (F) Pry Edu Mansehr  
Min: Education Schools  
NTN:  
GPF #:  
Old #:

Pers #: 00712174 Buckle:  
Name: RANI GUL  
Dsg.: PRIMARY SCHOOL TEACHER  
CNIC No.1350368607390  
GPF Interest Applied  
12 Vocational Temporary

MA7044 -

PAYS AND ALLOWANCES:

5002-Adjustment House Rent	1,306.00
5012-Adjustment Medical All	1,200.00
5309-Adj. 15% Adhoc Allowance	1,200.00
5898-Adj. Adhoc Allowance 50%	2,177.00
5911-Adj. Adhoc Relief 2011	653.00
5938-Adj. Adhoc Relief All 2012	1,600.00
5950-Adj:Adhoc Relief All-2014	800.00
5801-Adj Basic Pay	8,000.00

Gross Pay and Allowances 16,936.00

DEDUCTIONS:

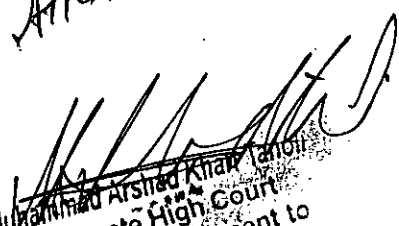
4200-Professional Tax	Subrc:	100.00
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Total Deductions 100.00

16,836.00

D.O.B  
24.06.1984  
02 Years 10 Months 006 Days

LFP Quota:  
HABIB BANK LIMITED SHINKIARI ROAD, MANS  
7900259303

*Attested*  
  
Muhammad Arshad Khan  
Advocate High Court  
Office No 33 Adjacent to  
Jail, Faisalabad

S#: 1 Manshra  
 Pers #: 00712174 Buckle:  
 Name: RANI GUL  
 Dsg.: PRIMARY SCHOOL TEACHER  
 CNIC No. 1350368607390  
 GPF Interest Applied  
 12 Vocational Temporary

P-26  
 Annx: F  
 P Sec: 001 Month: May 2015  
 MA7044 - Dy D O (P) Prv Edu Mansehr  
 Min: Education Schools  
 NTN:  
 GPF #:  
 Old #:

(32-1)

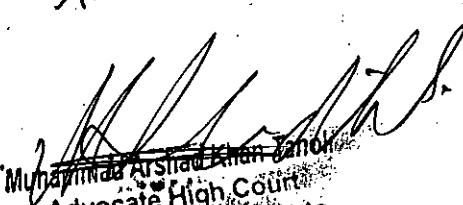
PAYS AND ALLOWANCES:	MA7044	-
5002-Adjustment House Rent		1,306.00
5011-Adj Conveyance Allowance		2,856.00
5012-Adjustment Medical All		1,200.00
5309-Adj. 15% Adhoc Allowance		1,200.00
5898-Adj. Adhoc Allowance 50%		2,177.00
5911-Adj. Adhoc Relief 2011		653.00
5938-Adj. Adhoc Relief All 2012		1,600.00
5950-Adj: Adhoc Relief All-2014		800.00
5801-Adj Basic Pay		8,000.00
Gross Pay and Allowances		19,792.00
DEDUCTIONS:		

Subrc:

Total Deductions 0.00  
 19,792.00

D.O.B 24.06.1984  
02 Years 11 Months 007 Days

LFP Quota:  
 HABIB BANK LIMITED SHINKIARI ROAD, MANS  
 7900259303

*Attested*  
  
 Muhammad Arshad Khan Jano  
 Advocate High Court  
 Office No 33 Adjacent to  
 Court for Appellate

# Election duty 2013

P-28

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## OFFICE OF THE RETURNING OFFICER

National Assembly -20  
 Province Khyber Pakhtoonkhwa-56  
 No: 127

Date 11/05/2013

### OFFICE MEMORANDUM

In pursuance of the provisions of section 9 of the Representation of the People Act, 1976, the following appointment of Presiding Officer/Assistant Presiding Officers/Polling Officers are hereby made.

At Polling Station 301 Government Girls Middle School Chinar Kot (Combined) for election to the National Constituency No: NA-20 Manshra-I, PK-56, Manshra-IV.

To be held on the 11<sup>th</sup> May 2013.

Name & designation of presiding officer	Name & designation of Assistant presiding officer	Name & designation of polling officer	Name of assistant presiding officer designated as presiding officer
Doctor Muhammad Shoaib SMO PHC Chatter Plain 03005643037	1. Taj Malook CT Chatter Plain 03335051827	1. Arif 236 PST GGPS Dheri Haleem 03335062487	Taj Malook CT Chatter Plain
	2. Rasheed Ahmad TT GHS Iehrian 03335025394	2. Muhammad Haroon PST G/S Dheri Haleem 03229227189	
	3. Mati-ur-Rehman TT GHSS Battal 0345597057	3. <del>Rani Gul PST GGPS Lami 03455367857</del>	
	4. Ghafran Shah Qari GHSS Battal 03025256252	4. <del>Sahiba PST GCP Kot 03005601933</del>	
	5. Zahida CT GGMS Banda Gesuch 03479843883		
	6. Salma DM GGMS Banda Gesuch 03125753884		
	7. Nelofar PST GGPS Kot 03439557797		
	8. Gulshan PST GGPS Single Kot - 03348351299		

Attested  
 Muhammad Arshad Khan Durrani  
 Advocate High Court  
 Office No 33 Adjacent to Dist Bar Abbottabad

Note: The Presiding Officer is directed to bring his two passport size photographs and to make sure the attendance of polling staff positively within time.

Training: 27.04.2013 (For Males Pr.Off and AP's only).

Exercises: 29.04.2013 (For P.O's and APO's).

Polling Officers (Male): 04.05.2013. Female Polling Officers: 05.05.2013.

Venue: Government Commerce College & Management Sciences, Manshra.

Returning officer  
 PK-56 Manshra-IV  
 Place:

Returning Officer  
 NA-20 Manshra-I  
 Place:



# Election Duty 2015

P-29



OFFICE OF THE RETURNING OFFICER,  
MALIKPUR(32),BAFFA(33),SHOUKATABAD(34)  
& TRANGRI SABIR SHAH(35) MANSEHRA.

No: DPS & PCC/Elec. 2015/ 74

Dated: 12/5/2015

## OFFICE MEMORANDUM

In pursuance of the provision of rule 11 of the Khyber Pakhtunkhwa Local Councils (Conduct of Elections) Rules, 2014, the following appointments of Presiding Officer/Assistant Presiding Officers/Polling Officer are hereby made:

Polling Station GGHSS Baffa Kalan (Female) (Polling Station No. 16)

Ward: Baffa

Neighbourhood Council:- Baffa Kalan

### Presiding Officer

S.No	Name	Designation	School/Deptt.	Contact No
1	Nazia Abbasi	SS	GHSS Phulra	03219814901

### Assistant Presiding Officers

S.No	Name	Designation	School /Deptt.	ContactNo
1	Noreen Manan	Sr. PET	GGHSS Murad Pur	3003574546
2	Perveen Akhter	Sr. CT	GGHSS Murad Pur	3450572880
3	Attia Gul	Sr. PST	GGCMS FAQIR ABAD TAJAL	
4	Bibi Shaheen	Sr. PST	GGCMS FAQIR ABAD TAJAL	
5	Saima Naz	SST-Gen	GGCMS FAQIR ABAD TAJAL	
6	Riffat Ara	PSHT	GGPS GULI BAGH	
7	Gulnaz	PSHT	GGPS Anyatabad	0345-9628949
8	Rani Gul	PST	GGPS Lammi Battal	0300-7059470

Note: In case of emergency APO at S. No. 1, will act as Presiding Officer.

### Polling Officers

S.No	Name	Designation	School /Deptt.	Contact No
1	Bibi Zahida Mahjabeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
2	Sameena Tamkeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
3	Tehmina Gul	PSHT	GGPS MANSEHRA NO.3	3155819465

## TRAINING SCHEDULE

Date	Time	Venue
23-05-2015	8:30 am	Government Higher Secondary School No. 1 Mansehra.

Please ensure your attendance in the training.

Attended  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Mansehra

*[Signature]*

OFFICE OF THE DISTRICT EDUCATION OFFICER ( FEMALE ) MANSEHRA.

No. 1926/AF(01)

Dated 01/10/2014

P-30  
Annex 5  
22

SHOW CAUSE NOTICE.

Muhammad Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, do hereby advise you Mst. Rani Gul, PTC GGPS Monjahni Mansehra as follows

1. You were illegally appointed as PTC at GGPS Monjahni, vide defunct Executive District Education Officer (E&SI) Mansehra Endst. No. 1170-79 /Aptt./PST/F/ dated 20.6.2012, whereas you was stranger for recruitment process initiated through EATA, you never appeared in selection process as a candidate for said post through EATA your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)I &SI D/A 17/2013 Umar Khan LDO BS 19 dated 25.8.2014. More over the then EDO (E&SI) removed from Government Service in connection with all such bogus appointment including you made by him

2. Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defense before the inquiry committee:

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

- Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- Inflicted huge financial losses to the Govt. Treasury receiving pay and result of bogus appointment.
- By snatching established rights of the deserving candidates due for appointment on merit. Cheating /cancelling the facts for unlawful appointment with collusion of the EDO.

- As a result thereof, I as competent authority, have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- You are, hereby, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex parte action shall be taken against you.
- A copy of relative page of the finding of the inquiry committee is enclosed

Mst. Rani Gul, PST  
GGPS Monjahni.

Attested

COMPETENT AUTHORITY

District Education Officer  
(Female) Mansehra

Muhammad Arshad Khan Qanoni  
Advocate High Court  
Office No. 33 Adjacent to  
District Bar Association



P-34  
A M...  
1,

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Whereas Mst. Rani Gul D/O Dildar Tanoli working as PSI GGHP/GGM/GGP Manjani was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex-Executive District Officer Elementary and Secondary Education Mansehra.
- i) Syed Hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
- ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhawa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Rani Gul D/O Dildar Tanoli PSI GGHS/GGM GGPS Manjani

*[Signature]*  
DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA

Endst: No. 1946-55/AE /Etab: dated 13/03/2015  
Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress \_\_\_\_\_
7. SDEO (F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: \_\_\_\_\_
10. Office File.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

Attested  
*[Signature]*  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
2nd Floor

P-32

P-35

Annex-J

The Director,  
Elementary & Secondary Education,  
Gujranwala Division

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION  
ISSUED UNDER ENDORSEMENT NO. \_\_\_\_\_ DATED 3<sup>RD</sup> MARCH 2015  
BY WHICH A MAJOR PENALTY OF DEEMED FROM GOVERNMENT SERVICE  
WAS IMPOSED UPON THE APPELLANT IN A HIGH  
CAPRICIOUS/WHIMSICAL MANNER WITHOUT LAWFUL AUTHORITY  
(COPY OF THE IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS  
ANNEX "A").

THE SAID IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM  
THE DATE OF ITS ISSUANCE DECLARING THE SAME WITHOUT LAWFUL  
AUTHORITY CONTRADICTORY TO THE RECRUITMENT POLICY & RULES  
OF THE GOVT. ALL THE APPELLANT WITH ALL BACK BENEFITS AT THE SAME  
DATE.

It is to invite your attention to the following facts in  
connection to colorful exercise of power on the part of authority i.e DFO  
(Manshra).

That the then Executive District Officer E&SE Manshra invited  
all the candidates at various offices at various offices in District  
Manshra through ads. The same published in daily MASHRAQ.

That as per procedure applicant applied for the post of PST being a  
qualified teacher having P.T.C., B.Ed & MA and ETA Test was conducted  
on 07/07/14 and applicant appeared as a candidate under Roll  
No. of Manshra District Education Office.

That the then EDO conducted interview and scrutinized the documents  
of all candidates, and the candidate was displayed for  
receiving objections. After the official process the meeting of DSC was

Attested  
Munir Ahmad Khan  
Advocate High Court  
Office No. 33 Adjacent to  
Dist. Bar Association

held and approved the cases of PST candidates for appointment against the vacant posts of PST.

That appointment order of the appellant was issued under endorsement No.1120-29/Estt: Apptt:PST/2011-12/ dated 20/06/2012 and appellant was posted at GGPS Monjhani Circle Shergarh. Copy attached, and then transferred from GGPS Monjhani to GGPS Hari Nakka and then GGPS Tami Battal.

That appellant continuously performing her duty without any break for the last 03 year 08 months while she received a show cause notice whereby allegations were leveled against the appellant based on concoction, baseless & concealment of facts: (Copy attached)

That a comprehensive reply was submitted in response of the show cause notice wherein appellant admitted continuation that she was appointed after due recruitment process and her appointment order along-with others candidates was issued in a lot after the approval of DSC.

That appellant received impugned order dated 3rd March 2015, whereas the major penalty of dismissal from service has been imposed upon the appellant.

That appellant passed the professional qualification i.e., PTC, CT, etc. and her marks with good marks in the degree and certificates were also got verified from the concerned University / Board / Institutions by the District Officer (Female) Copy attached.

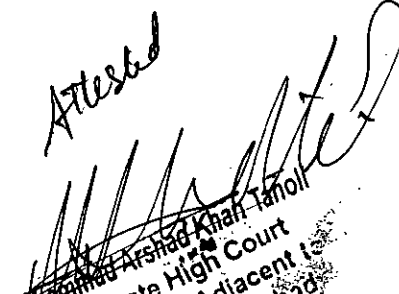
That the appellant was not paid any salary after her appointment upto one year, inspite of several appeals and applications to the District Officer, she submitted here appeal to the Honourable High Court Abbottabad for release of her salary.

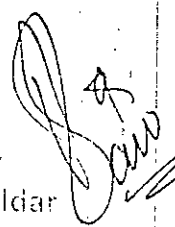
The Honourable High Court Abbottabad had order to the District Officer F&SL for release of the salary of appellant with the remarks that the appellant is regular Government Servant in Education Department and her salary be released. Vide M.P.No.592-A/2013 (Copy attached).

*Muhammad Arshad Khan Jaholi*  
Muhammad Arshad Khan Jaholi  
Advocate High Court  
Office No: 33 Adjacent to

~~Arshad~~

- d) Appellant was appointed after due process of recruitment through ETA test and his appointment order was issued after the approval of DSC on appeal submitted by the appellant to the EDO. The appellant served as regular teacher in Education Department for the last 2 years and 08 months and no action was taken, no show-cause was served neither asked for any irregularities or personal hearing during the Probation period.
- e) No inquiry was conducted or initiated, no opportunity of defense was offered, no personal hearing was made, how the authority was passed in the light of EDO rules under what charges/ evidence imposed such a harsh punishment.
- f) The inquiry regarding illegal appointment was made against the then EDO not against the candidates/teachers (The finding of the enquiry is attached)
- g) The inquiry was made and in the finding no recommendation was issue for the termination of teachers, they only recommended the appointing authority for minor punishment i.e. one step down or 2 increments deduction.
- h) The Public Education Officer has dismissed all the teachers from service after 3000 years, which is absolutely against the human rights and against the justice.
- i) In the light of the above facts, it is humbly requested that to set aside the illegal dismissal order / notification that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station.

Attested  
  
 Muhammad Arshad Khan Tanoli  
 Advocate High Court  
 Office No: 33 Adjacent to  
 Dist Bar Abbottabad

  
 Rani Gul PST D/O Dildar  
 Mohallah Near Braff Khana, Pakhwal  
 Road  
 PO Mansehra Tehsil & District  
 Mansehra  
 CNIC No.13503-3860739-0

10/3/2015

P-35

P-35

Annex 1

LEOPARDS COURIER SERVICES PVT. LTD. 5730827-1

From:	To:	Leopards Courier	
From:		Pieces	
From:		Weight	
CASH		NO DECLARED VALUE	DATE
TIME		SIG.	

Price Inclusive of G.S.T. 12-00-9808-001-91

\*Leopards\* Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed All the Conditions Printed on Reverse

For Suggestions/Complaints Contact info@leopardscourier.com  
Now Send Gifts To Your Loved One's By Leopards Loveline  
www.leopardscourier.com

پیش از خرید ہر چیز پرچہ / اجراءات اور چستی مشیادہ لوہرہ کو مہینہ  
توں نہیں کرتا۔ اگر آپ سے خط لکھنا چاہتی کہتے ہوں اس کوئی شے لوہرہ سے  
ہماری کی تو ہمیں مشیادہ کی آئندہ کی پر لوہرہ کی کوئی آئندہ اس کی نہ ہوگی۔

Attested

*[Signature]*  
 Advocate High Court  
 Office No: 33 Adjacent  
 ...

BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR

In the matter of  
Appeal No. 746/2015

Annex - L  
P - 36

RANI GUL..... (Applicant)

Versus

Govt of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar and others.....  
(Respondents)

Application for permission for filing amended  
appeal in view of the Modification in the final  
order i.e conversion of penalty from dismissal  
to removal from service vide order dated  
25.08.2015.

Respectfully Submitted:

1. That the above noted appeal is pending adjudication before this Honorable Tribunal and is fixed for hearing on 21.01.2016, at Camp Court Abbottabad.
2. That the appellant request for allowing necessary amendment in the following manner inter alia on the following grounds:-

Grounds of Application

- A. That the appellant has in the titled appeal challenged the order dated.03.03.2015, vide which she has been dismissed from service. Before approaching the Honorable Tribunal, the appellant also submitted the mandatory departmental appeal on 10.03.2015, however the same was not responded till 90 days, hence the appellant filed the titled appeal.

Filed  
Muf...  
Advocate High Court  
Office No 33 Adjacent to  
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B. That now during the pendency of the titled appeal the Appellate authority has issued notification dated 25.08.2015, whereby the departmental appeal of the appellant has been rejected, however her Penalty order issued by the DEO Female, Mansehra vide order dated 03.03.2015, is modified to the extent of conversion of Penalty of dismissal into Removal from service. *(Copy of the order dated 25.08.2015, is attached)*

P-37

C. That in light of the said modification and to avoid future complications; it is necessary to amend the titled appeal to the extent of challenging the order dated 25.8.2015.

D. That there is no legal impleadment in allowing such permission, rather the interest of justice would best be served.

*It is, therefore, humbly prayed that on acceptance of the instant application the appellant may please be allowed to file amended appeal in view of the issuance of final order whereby the penalty of dismissal from service was converted to removal from service vide order dated 25.08.2015.*

Appellant  
*Rome J*

Through

Abdul Saboor Khan  
&

*Malik*  
Malik Ishfaq Ahmad Jilani  
(Advocates, High Court)

**Affidavit**

I do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal

**ATTESTED**

Dated: \_\_\_/11/2015



Deponent

*Attested*  
*Muhammad Arshad Khan*  
Advocate High Court  
Office No: 33 Adjacent to  
Jett Bar Abbottabad

کورٹ فیس قیستی

# وکالت نامہ

بعدالت Service Tribunalette Peshawar

عنوان: MST Rani Gul Court etc بنام

منجانب: Appellant

نوعیت مقدمہ: Service Appeal

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Muhammad Arshad Khan Tanoli

Advocate High Court

Office No: 33 Adjacent to

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل صاحب

موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور قبول

ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی

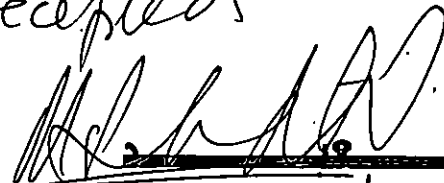
پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المترقوم:

بمقام:

Accepted



M. Arshad Khan  
Tanoli Adv.

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
District Court Abbottabad

Rani Gul

BEFORE THE KPK SERVICE TRIBUNAL,  
PESHAWAR

*Appeal No. 746/15*  
Mst. Rani Gul .....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar etc. .... Respondents

SERVICE APPEAL

INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of service appeal alongwith affidavit.	.....	1-9
2	Application for status-quo.	.....	10-11
3	Correct addresses of the parties.	.....	12
4	Copies of educational record.	"A"	13-23
5	Copy of the advertisement.	"B"	24
6	Copies of E.T.A Test result. <i>and appeal for correction</i>	"C"	25-26
7	Copy of the appointment and adjustment orders.	"D"	27-30
8	Copy of the Pay Roll.	"E"	31-32
9	Copy of the show cause notice.	"F"	33
10	Copy of the impugned order dated 03.03.2015.	"G"	34
11	Copy of the departmental appeal.	"H"	35-37
12	Copy of the receipt.	"I"	38
13	Copy of the letter of election duty.	"J"	39-40
14	Copy of the written reply of respondent No.3.	"K"	41
15	Copy of the judgment of Honourable Peshawar High Court.	"L"	42-43
16	Wakalat Nama.		44

Dated 01.07.2015

*[Signature]*  
Mst. Rani Gul  
...Appellant

Through

*[Signature]*  
ABDUL SABOOR KHAN,  
MALIK ASHFAQ AHMED JILANI,  
Advocates High court,  
Mansehra.

P-1

BEFORE THE KPK SERVICE TRIBUNAL,  
PESHAWAR

Appeal No. 746/2015

Mst. Rani Gul daughter of Dildar resident of  
Khaki, Tehsil and District Mansehra, Ex-PST  
Government Girls Primary School Lammi Battal,  
Tehsil Balakot District Mansehra .....Appellant

A.W.P. Province  
Service Tribunal

Diary No. 766

Dated 06-7-2015

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar.
2. Director Education Department, Khyber  
Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE)  
Education Mansehra.
4. District Accounts Officer, Mansehra  
.....Respondents.

**SERVICE APPEAL UNDER SECTION 4 OF  
KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE  
ORDER ENDST NO.1946-55/AE/ESTAB  
DATED 03.03.2015 VIDE WHICH THE  
APPELLANT WAS DISMISSED FROM  
SERVICE.**

**PRAYER: -**

On acceptance of instant appeal, the  
impugned order dated 03.03.2015 may  
please be set aside and the appellant  
may graciously be re-instated in service  
with all back benefits.

6/7/15

Respectfully Sheweth!

1. That, the appellant is resident of Khaki, Mansehra, Tehsil and District Mansehra.

2. That the appellant is fully qualified and having the required documents/certificates.

*(Copies of educational record are annexed as annexure "A").*

3. That, the District Education Officer, Mansehra/respondent No. **3** advertised some vacancies in Daily Mashriq.

*(Copy of the advertisement is annexed as annexure "B").*

4. That, as per procedure, the appellant applied for the post of A.T being a qualified teacher having PTC, C.T, B.Ed. and M.A Education. E.T.A test was conducted on 26.02.2011 and the appellant appeared as a candidate and obtained 178 marks out of 300 under roll No.3110.

*(Copies of E.T.A Test result is annexed as annexure "C").*

5. That, the then E.D.O conducted interview and scrutinize the documents

of the candidates, and merit list of the candidates was displayed for receiving objections. After due official process, the meeting of D.S.C was held and approved the case of PST candidates for appointment against the vacant post of PST and the appointment order of the appellant was issued under Endst. No.1120-29/Estt: Apptt: PST/2011-12 dated 20.06.2012 and the appellant was posted at GGPS Monjhani and later on transferred and adjusted to different schools.

*(Copy of the appointment and adjustment orders is annexed as annexure "D").*

6. That, the appellant performed her duties very honestly, regularly and fairly since the time of her appointment in above-mentioned different schools and also received her salaries till June 2015.

*(Copy of the Pay Roll is annexed as annexure "E").*

7. That, the appellant was continuously performing her duties without any break for the period for which the salaries were received and has never been found guilty of any kind of absenteeism, truancy, misconduct, misfeasance, malfeasance or nonfeasance, nor been

found guilty of dereliction of duty. Without taking these things into consideration, the respondent No.3 issued show-cause notice to the appellant levelling baseless allegations against the appellant therein.

*(Copy of the show cause notice is annexed as annexure "F").*

8. That, reply to the notice was submitted.
9. That, the appellant appointment was terminated through impugned dismissal order dated 03.03.2015 by imposing major penalty of dismissal from service.

*(Copy of the impugned order dated 03.03.2015 is annexed as annexure "G").*

10. That, being aggrieved from the impugned dismissal order, the appellant preferred departmental appeal before the Director (Elementary & Secondary) Education Peshawar but of no avail.

*(Copy of the departmental appeal and receipt thereof are annexed as annexure "H & I").*

11. That, the appellant was also directed to perform election duty during the local election of 2013.

*(Copy of the letter of election duty is annexed as annexure "J").*

12. That, in reply to show cause notice issued by the Honourable Peshawar High Court, Abbottabad Bench to Mst. Shamim Akhtar, the then District Education Officer, Mansehra not only admitted regularity, legality, propriety and genuineness of the appointment of the appellant but also rendered unconditional apology for not complying with salary releasing order of the Honourable Court.

*(Copy of the written reply of respondent No.3 is annexed as annexure "K").*

13. That, the appellant being aggrieved from the impugned order, seeks the gracious indulgence of this Honourable Court/tribunal, inter alia, on the following amongst the other grounds: -

#### **GROUNDS**

- i. That, the impugned order dated 03.03.2015 is wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, without lawful authority, based on malafide, un-constitutional and against the relevant rules and



regulations hence not maintainable and liable to be set aside.

- ii. That, the services of the appellant were terminated on the fact that the appellant's appointment was the result of misuse of the authority by the then E.D.O Mr. Umer Khan; such fact cannot legally be made base for removal from the service and same is the case of appellant. The appellant legally, as per the principle of natural justice, as per the rule of good governance and in the light of her fundamental rights guaranteed in the constitution could not have been penalized with major penalty for act, howsoever, illegal, unjustified and without jurisdiction of the then E.D.O Mr. Umer Khan.
- iii. That, perusal of first para of impugned show cause notice is self explanatory and worth considering for reinstatement of the services of the appellant.
- iv. That, there is no case of ill-gotten means against the appellant and section-20 of General Clauses Act is not applicable to the case of the appellant because appellant has not been found guilty of any misconduct or procuring

her services through any fraudulent means.

- v. That, in the light of authoritative decisions/view of the superior judiciary including the Supreme Court of Pakistan, the services of the appellant could not have been terminated and the impugned order/notification could not have been issued because where the authority is guilty of irregularities, illegalities and procedural violations, the services of an employee cannot be terminated.
- vi. That, no opportunity of personal hearing has been given to the appellant and her services have been struck through a single stroke of pen. Thus the impugned order is also against the principal of natural justice that no one should be condemned unheard.
- vii. That, there is allegation in the show-cause notice that the appellant never appeared in the selection process of the candidates and her name did not fall in the merit list prepared for the selection of candidates. This fact is belied from the merit list annexed herewith, reply submitted in the Honourable High Court in response to

C.O.C filed by the present appellant therein.

- viii. That, Writ Petition No.592-A of 2013 alongwith C.M No.434-A of 2013 had also been filed by the present petitioner for her salaries to which the respondent No.3 not only admitted, though impliedly, the propriety and legality of the appointment of the appellant but also paid to her salaries.

*(Copy of the judgment of Honourable Peshawar High Court is annexed as annexure "L").*

- ix. That, in reply to show cause notice issued by the Honourable Peshawar High Court, Abbottabad Bench to Mst. Shamim Akhtar, the then District Education Officer, Mansehra not only admitted regularity, legality, propriety and genuineness of the appointment of the appellant but also rendered unconditional apology for not complying with salary releasing order of the Honourable Court.

**PRAYER: -**

It is, therefore, most humbly prayed that on acceptance of instant appeal, the impugned order dated 03.03.2015 passed by the respondent No.3 may

please be set aside and the appellant may graciously be re-instated in service with all back benefits.

Dated 01.07.2015

Mst. Rani Gul  
.....Appellant

Through.

ABDUL SABOOR KHAN,  
MALIK ASHFAQ AHMED JILANI,  
Advocates High court,  
Mansehra.

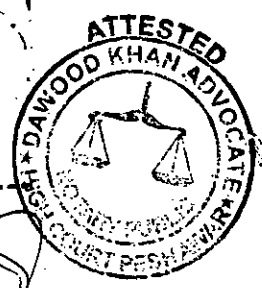
**AFFIDAVIT**

I, Malik Ashfaq Ahmed Jilani, Advocate High Court, Mansehra, counsel for the appellant, do hereby solemnly affirm and declare on oath that the contents of this appeal are true and correct to the best of my knowledge and belief as per information furnished by my client and nothing has been concealed from this Honourable Court.

Dated 01.07.2015

MALIK ASHFAQ AHMED JILANI,  
Advocate High court,  
Mansehra.

06 JUL 2015



**BEFORE THE KPK SERVICE TRIBUNAL,  
PESHAWAR**

Mst. Rani Gul .....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar etc.....Respondents

**SERVICE APPEAL**

**APPLICATION FOR SUSPENSION OF  
OPERATION OF IMPUGNED ORDER  
DATED 03.03.2015 TILL THE DISPOSAL  
OF ABOVE-TITLED APPEAL.**

Respectfully Sheweth!

1. That, this application may please be considered as part and parcel of main appeal.
2. That, the appellant have a prima facie case and there is every hope of its success.
3. That, the balance of convenience also tilts in favour of the appellant.
4. That, if the operation of the impugned order dated 03.03.2015 has not been suspended then the appellant would suffer an irreparable loss and purpose of above appeal would become infructuous.

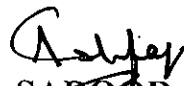
It is, therefore, most humbly requested that the operation of the impugned order dated 03.03.2015 may please be suspended till the disposal of main appeal.



Dated 01.07.2015

Mst. Rani Gul  
...Appellant

Through



ABDUL SABOOR KHAN,  
MALIK ASHFAQ AHMED JILANI,  
Advocates High court,  
Mansehra.

**AFFIDAVIT**

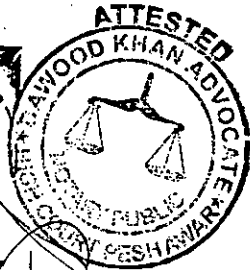
I, Malik Ashfaq Ahmed Jilani, Advocate High Court, Mansehra, counsel for the appellant, do hereby solemnly affirm and declare on oath that the contents of this application as per information furnished by my client are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated 01.07.2015



MALIK ASHFAQ AHMED JILANI,  
Advocate High court,  
Mansehra.

06 JUL 2015



**BEFORE THE KPK SERVICE TRIBUNAL,  
PESHAWAR**

Mst. Rani Gul .....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar etc.....Respondents

**SERVICE APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**


**APPELLANT**

Mst. Rani Gul daughter of Dildar resident of  
Khaki, Tehsil and District Mansehra, Ex-PST  
Government Girls Primary School Lammi Battal,  
Tehsil Balakot District Mansehra.

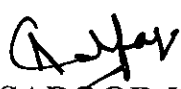
**RESPONDENTS**

1. Govt. of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar.
2. Director Education Department, Khyber  
Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE)  
Education Mansehra.
4. District Accounts Officer, Mansehra.

**Dated 01.07.2015**

  
Mst. Rani Gul  
...Appellant

Through

  
**ABDUL SABOOR KHAN,  
MALIK ASHFAQ AHMED JILANI,  
Advocates High court,  
Mansehra.**

P-138  
Annex A

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7194/AB(F)  
Dated Mansehra the 12/9/2013


To

The Controller of Examination,  
BISE Abbottabad

Subject:- VERIFICATION OF SSC & FA CERTIFICATE /DMC

Memo:  
Kindly find herewith enclosed DMC of SSC & FA in respect of Miss: Rani Gul appointed as PST Teacher in Education Department Mansehra vide this office endorsement No. 1120-29/Estt:Apptt:PST/2011-12 dated 20/06/2012 and now working at Government Girls Primary School Lami Circle Baital, bearing "Roll No:3473 session 2003 for (SSC)" & "Roll No.3258 session 2000 for (FA)" and return to this office after verification so that her pay can be released please.

Incls: SSC, FA DMCs &  
Bank Draft Bearing No. \_\_\_\_\_ (3 Copies)

  
DISTRICT EDUCATION OFFICER,  
(FEMALE) MANSEHRA

Attsted  
Asif



P- (14)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7195/AB(F)

Dated Mansehra the 12/9/2013

To

The Controller of Examination,  
Hazara University Dhodial Mansehra


Subject:- VERIFICATION OF BA & MA CERTIFICATE /DMCs

Memo:

Kindly find herewith enclosed DMCs of BA & MA in respect of Miss: Rani Gul appointed as PST Teacher in Education Department Mansehra vide this office endorsement No. 1120-29/Estt:Apptt:PST/2011-12 dated 20/06/2012 and now working at Government Girls Primary School Lami Circle Battal , bearing Roll No.06617 session 2005 for (BA) and Roll No.31528 session 2010 for (MA) and return to this office after verification so that her pay can be released please.

Incls: BA ,MA DMCs &

Bank Draft Bearing No. 000815 (3 Copies)

  
DISTRICT EDUCATION OFFICER,  
(FEMALE) MANSEHRA

Attested  
Rahman

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7193/AB(E)

Dated Mansehra the 12/9/2013

To

The Controller of Examination,  
Allama Iqbal Open University Islamabad


Subject:- VERIFICATION OF PTC & B-Ed CERTIFICATE /DMC

Memo:

Kindly find herewith enclosed DMC of PTC & B-ED in respect of Miss: Rani Gul appointed as PST Teacher in Education Department Mansehra vide this office endorsement No. 1120-29/Estt:Appt:PST/2011-12 dated 20/06/2012 and now working at Government Girls Primary School Lami Circle Battal, bearing Roll No.U625053 session 2006 Reg: 04nma0058 (For PTC) and Roll No.AJ662484 session 2012 Reg:04NMA0058 (For B-Ed) and return to this office after verification so that her pay can be released please.

Incls: PTC , B-ED DMCs &

Bank Draft Bearing No. \_\_\_\_\_ (3 Copies)

  
DISTRICT EDUCATION OFFICER,  
(FEMALE) MANSEHRA

Attested  
Rahman

Reg. No. 132338

1570  
P-16

Board of Intermediate & Secondary Education  
ABBOTTABAD

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)



Session 2000 (Annual/Supplementary)

Name Rani Gul  
Father's Name D. I. Dar Roll No. 3288

SUBJECT	Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. English	150	97	
2. Urdu	150	03	
3. Islamiyat Comp.	75	53	
4. Pakistan Studies	75	48	
5. Gen. Mathematics	100	31	Five hundred &
6. General Science	100	63	Twenty eight.
7. Art	100	68	
8. I.S	100	57	
Total	850	528	B

SECRETARY OFFICER  
BISE Abbottabad

RESULT

This Certificate is issued errors and omission excepted.

Prepared by: Nasir Checked by: R

Date 2000 15 NOV 2000

Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Attested  
Rashid

BOARD OF INTERMEDIATE & SECONDARY EDUCATION  
ABBOTTABAD  
DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination

P (7)

Sr. No. Z17805.....

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD**

**DETAILED MARKS CERTIFICATE**  
**Higher Secondary School Certificate Examination**  
**Part-II**



Name: RANI GUL  
 Father's Name: DILDAR  
 Group: HUMANITIES

Session: 2003 (Supply)

Roll No: 3473

Subjects	Marks	Marks Obtained					Marks In Words
		Part-I		Part-II		Total	
		Theory	Pract	Theory	Pract		
English	200	33	-	33	-	66	Sixty-Six
Urdu (Comp)	200	48	-	67	-	115	One Hundred Fifteen
Islamic Education	50	32	-	-	-	32	Thirty-Two
Pakistan Studies	50	-	-	17	-	17	Seventeen
Civics	200	40	-	51	-	91	Ninety-One
Islamic Studies	200	54	-	60	-	114	One Hundred Fourteen
Urdu (Advance)	200	33	-	56	-	89	Eighty-Nine
<b>Total: 1100</b>						524-D	Five Hundred Twenty-Four Only

**RESULT VERIFIED**  
**HSSC. SECRECY**  
 Total: 1100

**SECRET**  
 OFFICER  
 Board of Intermediate  
 & Secondary Education  
 Abbottabad

Remarks:

Checked By: \_\_\_\_\_  
 Date: 31-January, 2004

Controller of Examinations  
 Board of Intermediate & Secondary Education  
 Abbottabad

Note: Errors / Omissions excepted

Attested  
 Rani Gul


10366/A/04

SNo: 3772

PSA

P-18

HAZARA UNIVERSITY, MANSEHRA, NWER, PAKISTAN



HAZARA UNIVERSITY, MANSEHRA, NWER, PAKISTAN

DETAILED MARKS CERTIFICATE

BA Supplementary 2005

Roll No: 06617

Registration No: 04-P-870

Student's Name: Rani Gul

Father's Name: Dildar Tanoli

Institution/District: Mansehra

Part: Second

10366/A/04

Page = 214/388

23/09/13

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. Part 1 Marks	285	145	One Hundred & Forty-Five	Pass
2. English Compulsory	75	25	Twenty-Five	Pass
3. Pakistan Studies	40	18	Eighteen	Pass
4. Urdu	75	44	Forty-Four	Pass
5. Islamic Studies	75	44	Forty-Four	Pass

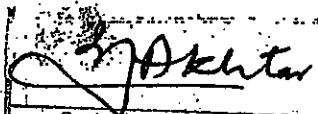
Total 550 276  
 Percentage 50.18 %  
 Division Second

Page = 65/95  
 23/09/2013  
 Signature

Prepared by: M. Anwar Chohan

Checked by:

VERIFIED BY



Controller of Examination  
 Hazara University, Mansehra

Controller Examinations  
 Hazara University, Mansehra  
 December 25, 2005

Attested  
 R. Khan

Note: Discrepancies on a copy of this certificate may be reported to the Controller of Examinations, Hazara University, Mansehra.

162

# HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 1832

P-19

## DETAILED MARKS CERTIFICATE

### MASTER OF ARTS ( FINAL ) ANNUAL EXAMINATION 2010

Roll No: 31528

Reg No: 04-P-870

Name: Rani Gul

F/ Name: Dildar Tanoli

Institution/  
District: MANSEHRA

Subject: Urdu

62744/A/07

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				235	TWO HUNDRED THIRTY-FIVE	
Poetry "Nazam"	100		46		46	FORTY-SIX	Pass
Qaseeda, Masnavi & Marsia	100		60		60	SIXTY	Pass
Iqbaliat	100		48		48	FORTY-EIGHT	Pass
Criticism	100		52		52	FIFTY-TWO	Pass
Essay	100		45		45	FORTY-FIVE	Pass
General Viva Voce	100		46		46	FORTY-SIX	Pass
Total:	1100				532	FIVE HUNDRED THIRTY-TWO	
Percentage:	48.36						
Division:	SECOND						

Print Date: 04-01-2011

Checked By: [Signature]

Errors and omissions are subject to subsequent rectification.  
Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Page 2/149/151

23/09/2013

Controller Examinations  
Hazara University, Mansehra  
January 04, 2011

VERIFIED BY  
[Signature]  
Controller of Examination  
Hazara University Mansehra

Attested  
[Signature]

P-20

Confidential



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
DEPARTMENT OF EXAMINATIONS  
(Verification Section)

No. F. 1-5/Veri/ 30056  
DISTRICT EDUCATION OFFICER (FEMALE)  
MANSEHRA

Dated: 06 Oct, 2013

*Signature*  
*for verification*  
*23/10/13*  
*DRCP*

Subject: VERIFICATION OF CERTIFICATE(S)/DEGREE(S)/DIPLOMA(S)/TRANSCRIPT/  
PRC ISSUED BY ALLAMA IQBAL OPEN UNIVERSITY

Dear Sir/Madam,

This is with reference to Letter No. 7193 dated 12 Sep, 13

on the subject noted above. It is certified that Certificate(s)/Degree(s)/Diploma(s)/ Transcript/PRC issued by the University to the following students are correct:

Sr. No.	Student & Father's Name	Programme	Registration No.	Certificate/Degree/Diploma/Transcript/PRC No.
1	RANI GUL DIL DAR TANOLI	PTC	04-NMA-0058	141745
2	RANI GUL DIL DAR TANOLI	B.ED	04-NMA-0058	413497

*Signature*  
Assistant Controller of Examinations  
Certificate Section  
Allama Iqbal Open University  
Islamabad.  
*lee*

*Attested*  
*Rashid*

1757  
Rashid  
24/10/2013  
D.E.O. G.H. U.  
(F) Islamabad

Serial No. 141745

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD



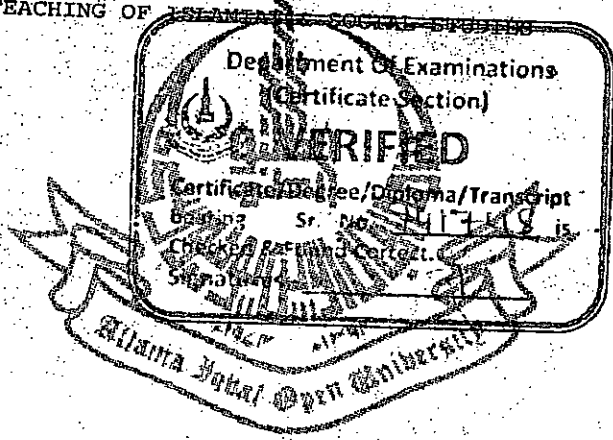
Name RANI GUL  
Fathers's Name DIL DAR TANOLI  
Address DILDAR TANOLI P/O KHAKI  
NEAR BY BOMBBY MOSQUE  
Tehsil MANSEHRA  
District MANSEHRA

Roll No. U625053  
Registration No. 04NMA0058  
Final Semester AUT- 2006

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	68
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	76
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	62
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	78
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	80
AUT- 06	0617	TEACHING OF URDU	100	63
AUT- 06	0618	TEACHING OF MATHEMATICS	100	61
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	68
AUT- 06	0620	TEACHING OF ISLAMIC SOCIAL STUDIES	100	72



CREDITS: 5

Total Marks / Obtained 900 / 628

Result Declared on SEPTEMBER 20, 2007

Percentage / Grade 70

Date of issue SEPTEMBER 25, 2007

*[Signature]*

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.

*Attended*  
*Rahjev*



# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

P-22  
150  
Sect  
Alia  
Inch  
nsi

Serial No. 413497

## PROVISIONAL RESULT CARD

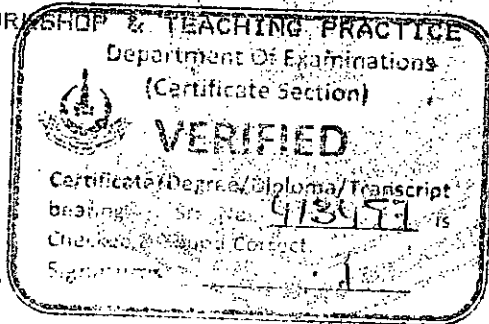
Name RANI GUL  
 Father's Name DIL DAR TANOLI  
 Address MUSTAFA TRADERS FARHANA RD KHAKI DILDAR  
 TANOLI P/O KHAKI NEAR BY BOMBBY MOSQUE  
 MANSEHRA  
 Tehsil MANSEHRA  
 District MANSEHRA  
 BACHELOR OF EDUCATION (B. ED)  
 has successfully completed

Roll No. AJ662484  
 Registration No. 04NMA0058  
 Final Semester SPR-2012

B-E

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 11	0513	SCHOOL ORGANIZATION	100	58
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	64
SPR- 11	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	69
SPR- 11	0651	ENGLISH (COMPULSORY)	100	61
AUT- 11	0517	TEACHING OF PAKISTAN STUDIES	100	55
AUT- 11	0658	TEACHING OF URDU	100	67
SPR- 12	0512	PERSPECTIVES OF EDUCATION	100	52
SPR- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	71
SPR- 12	0655	WORKSHOP & TEACHING PRACTICE	100	79



CREDITS: 6

Total Marks / Obtained 900 / 576  
 Percentage / Grade 64 B

Result Declared on JANUARY 04, 2013

Date of issue JANUARY 18, 2013

*[Signature]*  
**Controller of Examinations**

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

*Attested*  
*[Signature]*

**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**RESULT INTIMATION CARD**

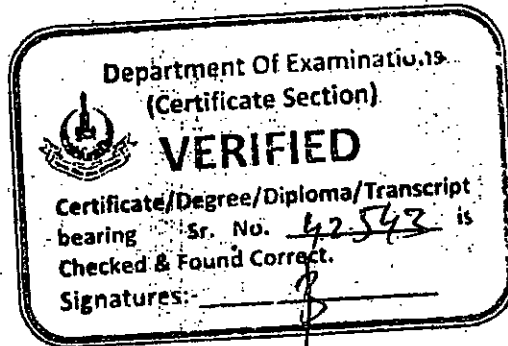
P-23  
Annex "A"

Serial No. 42543  
Registration No. 04NMA0058  
Roll No. 0688305

Certified that Mr/Ms. **RANI GUL**  
Father's Name **DIL DAR TANOLI**  
has Successfully Completed the **CERTIFICATE OF TEACHING**  
programme. The detail of course is as under

Address:- **DILDAR TANOLI P/O KHAYI NEAR BY BOMBAY MOSQUE, MANSEHRA DIST. MANSEHRA**

Semester	Course Code	Title of the Course	Marks	
			Maximum	Obtained
SPR-04	0631	DIMENSIONS IN EDUCATION	100	66
SPR-04	0632	EDUCATIONAL PSYCHOLOGY	100	58
SPR-04	0633	SCHOOL ORGANIZATION	100	57
SPR-04	0638	TEACHING STRATEGIES & EVALUATION	100	79
AUT-04	0604	URDU LANGUAGE AND ITS TEACHING	100	74
AUT-04	0605	SOCIAL STUDIES & ITS TEACHING	100	80
AUT-04	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	74
AUT-04	0634	ENGLISH AND ITS TEACHING	100	54
AUT-04	0635	ISLAMAT AND ITS TEACHING	100	64



*Handwritten signature: Hani Tanoli*

*Attested [Signature]*

Total Credit Hours \*\*  
Total AIOU Credits 5  
Result declared on November 21, 2005  
Date of Issue: December 2, 2005

Total Marks Obtained 900 / 584  
Percentage Marks 65 B  
CGPA \*\*  
Controller of Examinations

Note: This result card is issued as a notice only; errors and omissions are excepted. An entry appearing in it does not in-itself confer any right or privilege independently to the grant of proper certificate/degree which will be issued under the Regulations in due course of time.

تعمیرات و اصلاحات دہلی حکومت صوبہ خیبر پختونخوا

مذکورہ ذیل تعمیرات و اصلاحات دہلی حکومت صوبہ خیبر پختونخوا کے تحت جاری ہیں۔

Table with 2 columns: S.No. and Description of work.

Table with 4 columns: S.No., Name of contractor, Estimated cost, and Date of completion.

Pre Bid Meeting

زیر ذیل کی دہلی حکومت صوبہ خیبر پختونخوا کے تحت جاری تعمیرات و اصلاحات کے لیے ایک میٹنگ منعقد ہوگی جس میں شریکین...

- 1) ٹینڈر نامہ کے حصول کے لیے فہم کے لیے پوزیشننگ کی گئی ہے۔
2) 31-05-2011 تک ذراؤ کی فراہمی اور اس کے ساتھ ساتھ...

اگر کسی کو مزید معلومات کی ضرورت ہو تو براہ کرم ذیل نمبر پر رابطہ کریں۔

0937-770861 فون

مذکورہ ذیل تعمیرات و اصلاحات دہلی حکومت صوبہ خیبر پختونخوا کے تحت جاری ہیں۔

Table with 4 columns: S.No., Name of contractor, Estimated cost, and Date of completion.

مذکورہ ذیل تعمیرات و اصلاحات دہلی حکومت صوبہ خیبر پختونخوا کے تحت جاری ہیں۔

اگر کسی کو مزید معلومات کی ضرورت ہو تو براہ کرم ذیل نمبر پر رابطہ کریں۔

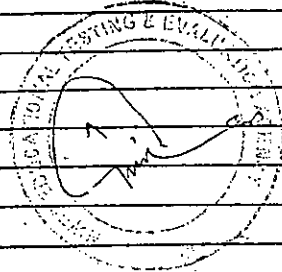
0937-770861 فون

Attested
Relief

TAT-1 FEMALE MANSEHRA RESULT 2011

P-25  
Annex C

Roll No	Name	Father Name	Marks	%age
1703103	ZARIA BIBI	M FARIQ	48	Fail
1703104	SUMERA KHURSHID	M ANWER SHAH	56	Fail
1703105	FARHAT	ABDUL KHALIQ	72	Fail
1703106	BIBI GULSHAN	AURENGZEB	24	Fail
1703107	NABEELA BASHEER	ABDUL HAMID	88	Fail
1703108	BIBI GUL	M M TARIQ	84	Fail
1703109	SAMINA BIBI	KHALID ROSHAN	72	Fail
1703110	RANI GUL	ABDUL SATAR SHAH	176	58.67
1703111	AMINA BIBI	M ISMAIL	92	Fail
1703112	BUSHRA RASHID	GULZAR HUSSAIN SHAH	104	Fail
1703113	BUSHRA JAVAID	DILDAR	112	Fail
1703114	MEHWISH		108	Fail
1703115	ALMAS		156	52.00
1703116	Mariam Bibi		132	44.00
1703117	Nosheen		64	Fail
1703118	Sobia		48	Fail
1703119	SOBIA		80	Fail
1703120	BIBI		108	Fail
1703121	BIBI		108	Fail
1703122	Fozia Bibi		136	45.33
1703123	SAIQABIBI		108	Fail
1703124	FARHATNAZ		164	54.67
1703125	LUBNAASHRAF		124	41.33
1703126	ANEESA		112	Fail
1703127	TAHIRAPARVEEN		64	Fail
1703128	ZAHIDABIBI		124	41.33
1703129	AZEEM		76	Fail
1703130	B I		188	62.67
1703131	SANIASARW		112	Fail
1703132	SAHIBZADIAZMATRABBAN		128	42.67
1703133	???		68	Fail
1703134	???		128	42.67
1703135	KOUSAR		116	Fail
1703136	SADIKANWAL		96	Fail
1703137	SAMEENAFARMAN		128	42.67
1703138	ASMAHAMEED	Affected	80	Fail
1703139	SAIQARAFIQ		104	Fail
1703140	MAJIDABIBI		88	Fail
1703141	MAZLOOMA		124	41.33
1703142	SHABNAM		112	Fail
1703143	BIBIANIQARANI		60	Fail
1703144	SHAHNAZ		44	Fail
1703145	SH?SHADBEGUM		52	Fail
1703146	FOZIABIBI		116	Fail
1703147	SEHRASH		92	Fail
1703148	NABEE?		80	Fail
1703149	FA?ZA		100	Fail
1703150	RUBANAGUL		136	45.33
1703151	TAHIRABIBI		76	Fail
1703152	SA?I?HALEEMA		116	Fail
1703153	SAMINAREHMAN		128	42.67
1703154	BIBIMARYAQAZI		116	Fail
1703155	NAHEEDABIBI		68	Fail
1703156	NAZIABIBI		64	Fail
1703157	NAILABIBI		168	56.00
1703158	NOREEN		76	Fail
1703159	?		152	50.67



Affected  
Rashid

16

عزت مآب محترم عمر خان صاحب ایگزیکٹو دسترکت آفیسر ایڈمنسٹری اینڈ سیکنڈری ایجوکیشن مانسہرہ

عنوان: اپیل برائے طلبی انحصاف

جناب عالی: مودبانہ گزارش ہے کہ:

۱۔ یہ کہ سانلہ نے بحوالہ اشتہار اخبار (مشرق) اپنی درخواست بمطابق مردہ جہ قاتلہ و ضوابط محکمہ ایڈمنسٹری اینڈ سیکنڈری ایجوکیشن مانسہرہ کی طرف سے جاری کردہ درخواست فارم پہ اپنی درخواست دفتر ہذا میں جمع کروائی۔

۲۔ یہ کہ سانلہ کی جمع کردہ درخواست فارم پر آپ جناب کی زیر سرپرستی ایٹاٹسٹ کے نام سے 3110 رولنسپر جاری کیا گیا جس پر سانلہ نے ایٹاٹسٹ دیا اور 176/300 ضرور سے کامیاب ہوئی۔

۳۔ یہ کہ ریزلٹ بک میں ایٹاٹسٹ والوں کی غلطی کی وجہ سے سانلہ کے والد کے نام غلط لکھا گیا تھا جس کی وجہ سے سانلہ کا نام آخری میرٹ لسٹ سے خارج کر دیا گیا ہے جس سے سانلہ کی حق تلفی کرتے ہوئے ناقابل تلافی نقصان (Ir- Repairable loss) دیا گیا ہے۔ ایٹاٹسٹ کی غلطی کی سزا سانلہ کو کیوں دی جا رہی ہے ایٹاٹسٹ کسی امیدوار کے کہنے پر نہیں بلکہ محکمہ کا اپنا فیصلہ ہے۔ اور اگر ایٹاٹسٹ والے کسی کا نام غلط لکھ دے کسی کی والدیت کسی کی غلط لکھ دے تو اس میں امیدوار کا کیا قصور ہو سکتا ہے۔ موجودہ ایٹاٹسٹ میں سیکشن ایسی غلطیاں موجود ہیں۔ محکمہ کو چاہیے تھا کہ وہ ایسے لوگوں کے کوٹف کے بارے میں ایٹاٹسٹ ویریفیکیشن کرواتے مگر ایسا نہیں کیا گیا۔

۴۔ یہ کہ سانلہ ایک کوالیفائیڈ ٹیچر ہے جس کی تعلیمی قابلیت درج ذیل ہے:

میسٹرک	528/850	فیسٹ ڈویژن
ایف اے	524/1100	سیکنڈ ڈویژن
ٹی اے	276/550	سیکنڈ ڈویژن
ایم اے	532/1100	سیکنڈ ڈویژن
پی ٹی سی	628/900	فیسٹ ڈویژن
سی ٹی	584/900	فیسٹ ڈویژن
ایٹاٹسٹ	176/300	سیکنڈ ڈویژن

2787  
8/5/2012

جبکہ میرا ہی ایٹاٹس وقت جاری تھا۔ جناب عالی جب سانلہ نے دیکھا کہ سانلہ سے بہت کم تعلیمیں قابلہ رکھنے والی امیدواروں کے ارتداد چکے ہیں اور میرا ارتداد نہیں ہو آئی ہے میں اب جناب کے پاس اپنا اپیل لے کر آئی ہوں تاکہ میرے ساتھ یہ سزا نہ کیا جائے۔ جناب عالی سانلہ ایک غریب خاندان سے تعلق رکھتے ہیں اور سانلہ کا والد عرصہ دراز سے بیمار ہیں۔ سانلہ کا کوئی ذریعہ روزگار نہیں اور بہت مشکل سے وقت گزارتے ہیں۔ آپ جناب سے اپیل کی جاتی ہے کہ سانلہ کو بحیثیت PST کسی بھی پرائمری سکول میں تعینات دیا جائے تاکہ سانلہ تاحیات دعا گو رہے گی۔ اور سانلہ امید کرتی ہے کہ سانلہ کو ہائی کورٹ جانے کی تاحیات تہمت نہیں آئی اور اس کے خلاف سانلہ کے ساتھ کوئی زیادتی کا واقعہ نہ ہو سکے۔

راہی کے دفتر ملتان، سانلہ کا  
ضلع مانسہرہ

Attested  
7/5/2012  
13503-3860739-0

P- (27) 4  
Annex = D



OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

As approved by the Departmental Selection Committee and on the verification of the documents from the concerned authorities, the Competent Authority has been pleased to appoint the Miss: Rani Gul D/O Dildar Tanoli R/O Mansehra as PST against vacant posts at GGPS Monjhani in BPS-7 @ Rs.5300-320-15400 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. He/she will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GP Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Mansehra)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. His/her services are liable to termination on one month prior notice from either side in case of resignation without prior notice, his/her one month pay/allowances if any shall be forfeited to Government Treasury.

R-334  
R-307

Attested  
Rahfar


- 9. His/her services can be terminated at any time in case his/her performance is found unsatisfactory; he/she will be proceeded against under the removal from service under E&D Rules 2011.
- 10. He/she should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
- 11. He/she may not be handed over the charge if his/her age is above 35 years and below 18 years.
- 12. The Candidates who are working as regular before 1<sup>st</sup> July 2001 in pervious post, his/her entitled for pension / gratuity etc.
- 13. No. TA/DA etc is allowed.
- 14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)  
 EXECUTIVE DISTRICT OFFICER  
 E&S EDU: MANSEHRA


Endst: No. 1120-29 /Estt: Apptt:PST//2011-12 Dated Mansehra the 22/6 2012  
 Copy to the:-

- 1. Secretary to Govt: of KPK E&SE Department Peshawar.
- 2. Director E&SE Department KPK Peshawar.
- 3. District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-7. Deputy District Officer (Female&Male) E&SE Mansehra.
- 8. PA to District Coordination Officer, Mansehra.
- 9. Budget & Accounts Officer, local office, Mansehra.
- 10. Candidates concerned.

Attested  
 Aashfaq

  
 EXECUTIVE DISTRICT OFFICER  
 E&S EDU: MANSEHRA

order issued by the EDO Umar Khan Kundi  
 where by CM NO: 434A in WP NO: 592-A  
2013 2013  
 honourable highcourt directed that pay  
 released by petitioner, hence the  
 order is varified for pay purposes

  
30/12/13

2  
 3  
 4  
 5

P-29  
Annex D

OFFICE OF THE  
EXECUTIVE DISTRICT OFFICER  
E&SE DEPARTMENT MANSEHRA  
NO. \_\_\_\_\_/ESTT:  
DATED MANSEHRA THE \_\_\_\_/2012

CORRIGENDUM

Please read GGPS Hari Nakka Circle Dhodial instead of GGPS Manjhani vide this office appointment order endst: No.1120-29/Estt:Apptt PST/2011-12.dated Mansehra the 20/06/2012 in respect of Miss: Rani Gul PST as Miss: Salma PST GGPS Hari Nakka has already been promoted / appointed as SET and adjusted at GGHS Jabori.

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

(UMAR KHAN KUNDI)  
EXECUTIVE DISTRICT OFFICER,  
E&SE MANSEHRA

Endst: No. 1316-19 / Dated Mansehra the 28/06 /2012

Copy forwarded to the:

1. The District Officer Female E&SE Mansehra.
2. The Deputy District Officer Female E&SE Mansehra.
3. The Assistant District Officer E&SE Circle Dhodial.
4. The Head Teacher GGPS Hari Nakka.
5. The Teacher Concerned.

Attested  
Rajay

  
EXECUTIVE DISTRICT OFFICER,  
E&SE MANSEHRA



OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDU: MANSEHRA.

P-30  
Annex = D

CORRIGENDUM.

As approved by the competent authority, please read Mst: Rani Gul PST instead of Mst: Zahida PST at S.No 2 in this office order No1693-96/GB/PK-55/DDO(F) dated 31/7/2012 in the interest of public service with immediate effect.

Note:-

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

Sd/-  
EXECUTIVE DISTRICT OFFICER  
E & S EDUCATION MANSEHRA

Endst:No 1836-41/GB/PK-55/DDO(F)

Dated 16/08/2012

Copy to the ;-

1. ADO circle Dhodial & Battal.
2. Head Teacher concerned.
3. Teacher concerned.

*[Signature]*  
DY:DISTRICT OFFICER (F)  
E&S EDU: MANSEHRA

*Attested*  
*[Signature]*

*[Signature]*  
31/8/12

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER, (FEMALE) MANSEHRA

R-323  
Annex D

ADJUSTMENT

As approved by the competent authority, the following Teachers as proposed by the ASDEO (Female) circle concerned are hereby adjusted at the station as mentioned below against their name to facilitate on humanitarian grounds on their own pay and grade in the interest of public service/Teachers with effect from their taking over charge.

S/1	Name of Teacher	From (GGPS)	To (GGPS)	Remarks
1	Aisha Yousaf, SPST	Devel	CMS Choian	Against V/Post
2	Abida, PST	Kayian Mathal	Charr	Against V/Post
3	Nazia Bibi, SPST	Pudnail	Mari Safdar Shah	Against V/Post
4	Syeda Nuzhat, SPST	Chambati	Charrian	Against V/Post
5	Rani Gu, PST	Larni	Chinarkote	Against V/Post
6	Hanida Begum, PST	Seri Subedar	Charrian Battal	Against V/Post
7	Musarat, SPST	Karkala	Fazal Abad	Against V/Post
8	Hajra Jamil, PST	Lassan Nawab	Palsala	Against V/Post
9	Somia	Bandi Badhan	Maira Hajam	Against V/Post
10	Naficeeda Naeem	Gara Kawai	Pairan Mansehra	Against V/Post
11	Uzma Sarfaraz	Badal Gran	Bangian	Against V/Post
12	Nusrat	Kotly Bala	Ichrian	Against V/Post
13	Sameena Gulab	Pudnial	Afzal Afad	Against V/Post
14	Saeeda Naz	Chitti Mohri	Madsarian	Against V/Post

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

Sd/-

DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA.

Endst: No. 475-80 Adjustment Need basis,

Dated Mansehra the 23/01/2015

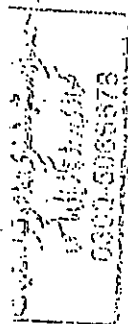
Copy to:-

1. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The District Accounts Officer, Mansehra.
3. The District Education Officer (Female) Mansehra.
4. All ASDEOs (Female) Circle Concerned.
5. Teachers Concerned.
6. Office File.

SUB DIVISIONAL EDUCATION OFFICER  
(FEMALE) MANSEHRA.

Attested

Rahfar



P-31  
Annex = 'E'

Manshra

Sr: 1

P Sec:001 Month:April 2015  
MA7044 -Dy D O (F) Pry Edu Mansehr  
Min: Education Schools  
NTN:  
GPF #:  
Old #:

Pers #: 00712174 Buckle:  
Name: RANI GUL  
Dsg.: PRIMARY SCHOOL TEACHER  
CNIC No.1350368607390  
GPF Interest Applied  
12 Vocational Temporary

MA7044 -

PAYS AND ALLOWANCES:

5002-Adjustment House Rent	1,306.00
5012-Adjustment Medical All	1,200.00
5309-Adj. 15% Adhoc Allowance	1,200.00
5898-Adj. Adhoc Allowance 50%	2,177.00
5911-Adj. Adhoc Relief 2011	653.00
5938-Adj. Adhoc Relief All 2012	1,600.00
5950-Adj:Adhoc Relief All-2014	800.00
5801-Adj Basic Pay	8,000.00

Gross Pay and Allowances 16,936.00

DEDUCTIONS:

Subrc: 100.00

4200-Professional Tax

Total Deductions 100.00

16,836.00

D.O.B  
24.06.1984  
02 Years 10 Months 006 Days

LFP Quota:  
HABIB BANK LIMITED SHINKIARI ROAD, MANS  
7900259303

Attested

*Rahfar*

P-32  
Annex E

Manshra

Sl: 1

P Sec:001 Month:May 2015  
MA7044 -Dy D O (F) Pry Edu Mansehr  
Min: Education Schools  
NTN:  
GPF #:  
Old #:

Pers #: 00712174 Buckle:  
Name: RANI GUL  
Dsg.: PRIMARY SCHOOL TEACHER  
CNIC No.1350368607390  
GPF Interest Applied

12 Vocational Temporary

MA7044 -

PAYS AND ALLOWANCES:

5002-Adjustment House Rent	1,306.00
5011-Adj Conveyance Allowance	2,856.00
5012-Adjustment Medical All	1,200.00
5309-Adj. 15% Adhoc Allowance	1,200.00
5898-Adj. Adhoc Allowance 50%	2,177.00
5911-Adj. Adhoc Relief 2011	653.00
5938-Adj.Adhoc Relief All 2012	1,600.00
5950-Adj:Adhoc Relief All-2014	800.00
5801-Adj Basic Pay	8,000.00
Gross Pay and Allowances	19,792.00

DEDUCTIONS:

Subrc:

Total Deductions 0.00

19,792.00

D.O.B 24.06.1984  
02 Years 11 Months 007 Days

LFP Quota:  
HABIB BANK LIMITED SHINKIARI ROAD, MANS  
7900259303

Attested

*(Signature)*

OFFICE OF THE DISTRICT EDUCATION OFFICER ( FEMALE ) MANSEHRA.

No. 7926/AE/10(F)

Dated 01/10/2014

P (33) Amis F.

22

SHOW CAUSE NOTICE.

Naghmatia Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, do hereby advise you Mst. Rani Gul, PIC GGPS Monjahni Mansehra as follows.

1. You were illegally appointed as PIC at GGPS Monjahni, vide defunct Executive District Education Officer (E&SE) Mansehra Endst. No. 1170-79 /Apt./PST/F/ dated 20.6.2012, whereas you was stranger for recruitment process initiated through EATA, you never appeared in selection process as a candidate for said post through EATA your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber, Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)I &SI D/4 17/2013 Umar Khan EDO BS-19 dated 25.8.2014. More over the then EDO (E&SE) removed from Government Service in connection with all such bogus appointment including you made by him.

2. Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defense before the inquiry committee.

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

- Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- inflicted huge financial losses to the Govt. Treasury receiving pay and result of bogus appointment.
- By snatching established rights of the deserving candidates due for appointment on merit. Cheating /cancelling the facts for unlawful appointment with collusion of then EDO.

- As a result thereof, I as competent authority, have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- You are, hereby, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.
- A copy of relative page of the finding of the inquiry committee is enclosed.

Mst. Rani-Gul, PST  
GGPS Monjahni.

Attested  
Rahman

COMPETENT AUTHORITY

District Education Officer  
(Female) Mansehra

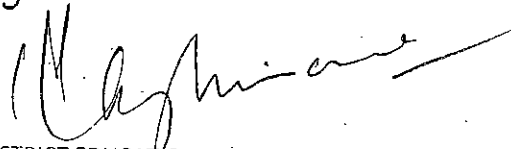


R-34  
Annex 'E'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

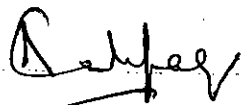
- 1:- Where as Mst: Rani Gul D/O Diddar Tanoli working as PSI GGHS/GGMS/GGP Manjani was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.
- i) Syed hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
- ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Rani Gul D/O Diddar Tanoli PSI GGHS/GGM GGPS Manjani

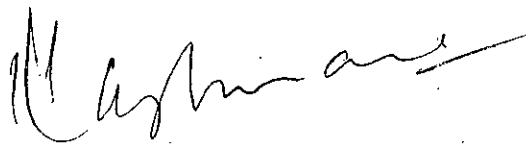
  
DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Endst: No: 1946-55/AE- /Estab: dated 03/03/2015.  
Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress \_\_\_\_\_
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: \_\_\_\_\_
10. Office File.

Attested



  
DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

P-35

Annex "H"

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa Peshawar

Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDORSEMENT NO. \_\_\_\_\_ DATED 3<sup>RD</sup> MARCH 2015 WHEREBY MAJOR PENALTY OF DISMISSAL FROM GOVERNMENT SERVICE WAS IMPOSED UPON THE APPELLANT IN A HIGH CAPRICIOUS/WHIMSICAL MANNER WITHOUT LAWFUL AUTHORITY (COPY OF THE IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS ANNEX "A").

Prayer:- CAPTIONED IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM THE DATE OF ITS ISSUANCE DECLARING THE SAME WITHOUT LAWFUL AUTHORITY CONTRADICTORY TO THE RECRUITMENT POLICY & RULES AND RE-INSTATE THE APPELLANT WITH ALL BACK BENEFITS AT THE SAME STATION.

Respected sir:-

I would like to invite your kind attention to the following facts in connection to colorful exercise of power on the part of authority i.e DEO (F) Mansehra.

1. That the then Executive District Officer E&SE Mansehra invited applications for recruitment of teachers of various cadres in District Mansehra through advertisement published in daily MASHRAQ.
2. That as per procedure appellant applied for the post of PST being a qualified teacher having PTC, CT, B-Ed & MA and ETA Test was conducted on 26/02/2011 and appellant appeared as a candidate under Roll No. 5110 and obtained 178 marks out of 300.
3. That the then EDO conducted interview and scrutinized the documents of the candidates, and merit list of the candidate was displayed for receiving objections. After due official process the meeting of DSC was

Attested

Rahman

held and approved the cases of PST candidates for appointment against the vacant posts of PST.

- 4. That appointment order of the appellant was issued under endorsement No.1120-29/Estt: Apptt:PST/2011-12/ dated 20/06/2012 and appellant was posted at GGPS Monjhani Circle Shergarh. Copy attached, and then transferred from GGPS Monjhani to GGPS Hari Nakka and then GGPS Lami Battal.
- 5. That appellant continuously performing her duty without any break for the last 02 year 08 Months while she received a show cause notice whereby allegations were leveled against the appellant based on concoction, baseless & concealment of facts: (Copy attached)
- 6. That a comprehensive reply was submitted in response of the show cause notice whereas appellant adopted continuation that she was appointed after due recruitment process and her appointment order along-with others candidates was issued in a lot after the approval of DSC.
- 7. That appellant received impugned order dated 3rd March 2015, whereas the major penalty of dismissal from service has been imposed upon the appellant.
- 8. That the appellant passed here professional qualification i.e , PTC, CT, B-Ed and MA with good marks. All the degrees and certificates were also get verified from the concerned University / Board / Institutions by the District Officer (Female) Copy attached.
- 9. That the appellant was not paid any salary after her appointment upto one year, inspite of several appeals and applications to the District Officer, she submitted here appeal to the Honourable High Court Abbottabad for release of her salary.
- 10. The Honourable High Court Abbottabad had order to the District Officer E&SE for release of the salary of appellant with the remarks that the appellant is regular Government Servant in Education Department and her salary be released. Vide W.P.No.592-A/2013 (Copy attached)

Attested

*Rahfar*



P-37  
Annex H<sup>3</sup>

Sir,

- a) Appellant was appointed after due process of recruitment through ETA test and her appointment order was issued after the approval of DSC on appeal submitted by the appellant to the EDO. The appellant served as regular teacher in Education Department for the last 2 years and 08 months and no action was taken nor show-cause was served neither asked for any irregularities or personal hearing during the Probation period.
- b) No inquiry was conducted or initiated, no opportunity of defense was offered, no personal hearing was made, how the authority was passed in the light of E&D rules under what charges/ evidence imposed such a harsh punishment.
- c) The inquiry regarding illegal appointment was made against the then EDO not against the candidates/teachers (The finding of the enquiry is attached)
- d) The enquiry was made and in the finding no recommendation was issue for the termination of teachers, they only recommended the appointing authority for minor punishment as one step down or 2 increments deduction.
- e) The District Education Officer has dismissed all the teachers from service after three years, which is absolutely against the human rights and against the justice.

In the light of the above facts, it is humbly requested that to set aside the impugned dismissal order /notification that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station.

*[Signature]*  
10/3/2018

Rani Gul PST D/O Dildar  
Mohallah Near Braff Khana, Pakhwal  
Road  
PO Mansehra Tehsil & District  
Mansehra  
CNIC No.13503-3860739-0

Attested  
*[Signature]*

P-38

June 1

**LEOPARDS COURIER SERVICES PVT. LTD.** 57308271 Pd/7c

From: <i>Rahman</i>		To: <i>Rahman</i>		Leopards Courier	
From: <i>Kant</i>		To: <i>Gul</i>		Pieces	
From: <i>Kant</i>		To: <i>Gul</i>		Weight	
CASH		NO DECLARED VALUE	DATE <i>10-1</i>	TIME	Price Inclusive of G.S.T. 12-00-9808-001-91
SIG.					

Leopards Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed All the Conditions Printed on Reverse

کیش/نہر/بیر/پاز/چیک/از/برائے اور/حق/اشیاء/لوہار/کو/بیز  
 توں/بھی/کرتا/کرتا/اگر/پہلے/نہ/ہو/تو/کرتے/ہو/اگر/کوئی/شے/لوہار/سے  
 ۱۰۰% کی/توا/بھی/اشیاء/کی/تشریح/پر/لے/ہو/گی/کوئی/دست/داری/نہ/ہو/گی۔

For Suggestions/Complaints Contact info@leopardscourier.com  
 Now Send Gifts To Your Loved One's By Leopards Loveline  
 www.leopardcourier.com

Attested  
Rahman

# OFFICE OF THE RETURNING OFFICER

P-39  
Annex = 'J'

National Assembly -20  
Province Khyber pakhtoonkhwa-56  
No: 127

Date 27/4/2013

## OFFICE MEMORANDUM

In pursuance of the provisions of section 9 of the Representation of the People Act, 1976. the following appointment of Presiding Officer/Assistant Presiding Officers/Polling Officers are hereby made.

For Polling Station 301 Government Girls Middle School Chinar Kot (Combined) for election to the National Constituency No: NA-20/Mansehra-I, PK-56, Mansehra-IV.

To be held on the 11<sup>th</sup> May 2013.

Name & designation of presiding officer	Name & designation of Assistant presiding officer	Name & designation of polling officer	Name of assistant presiding officer designated as presiding officer
Doctor Muhammad Shoaib SMO RIIC Chatter Plain 03005643033	1. Taj Malook CT Chatter Plain 03335051827 2. Rasheed Ahmad TT GHS Ichrian 03335025394 3. Mati-ur-Rehman TT GHSS Battal 0345597057 4. Ghafar Shah Qari GHSS Battal 03025256252 5. Zahida CT GGMS Banda Gesuch 03479843883 6. Salma DM GGMS Banda Gesuch 03125753884 7. Nelofar PST GGPS Kot 03439557797 8. Gulshan PST GGPS Single Kot 03348351299	1. Aurangzeb PST GPS Dehri Haleem 03335062487 2. Muhammad Haroon PST GPS Dheri Haleem 03229227189 <del>3. Rani Gul PST GGPS Plain 03455565857</del> 4. Suriya PST GGP Kot 03009566033	Taj Malook CT Chatter Plain

Attested  
Rahfar

Note: The Presiding Officer is directed to bring his two passport size photographs and to make sure the attendance of polling staff positively within time.

Training: 27.04.2013 (For Males Pr.Off and APOs only),

For dates: 29.04.2013 (For Pr.Off and APOs).

Polling Officers (Male): 04.05.2013, Female Polling Officer: 05.05.2013

Venue: Government Commerce College & Management Sciences, Mansehra.

Returning officer  
PK-56 Mansehra-IV  
Place: \_\_\_\_\_

Returning Officer  
NA-20 Mansehra-I  
Place: \_\_\_\_\_



P-40  
Annex J

OFFICE OF THE RETURNING OFFICER,  
MALIKPUR(32),BAFFA(33),SHOUKATABAD(34)  
& TRANGRI SABIR SHAH(35) MANSEHRA.

No: DPS & PCC/Elec. 2015/

Dated: 12/5/2015

## OFFICE MEMORANDUM

In pursuance of the provision of rule 11 of the Khyber Pakhtunkhaw Local Councils (Conduct of Elections) Rules, 2014, the following appointments of Presiding Officer/Assistant Presiding Officers/Polling Officer are hereby made

Polling Station GGHSS Baffa Kalan (Female)

(Polling Station No:-16)

Ward: Baffa

Neighbourhood Council:- Baffa Kalan

### Presiding Officer

S.No	Name	Designation.	School/Deptt.	Contact No
1	Nazia Abbasi	SS	GHSS Phulra	03219814901

### Assistant Presiding Officers

S.No	Name	Designation	School /Deptt.	Contact No
1	Noreen Manan	Sr. PET	GGHSS Murad Pur	3003574546
2	Perveen Akhter	Sr. CT	GGHSS Murad Pur	3450572880
3	Attia Gul	Sr..PST	GGCMS FAQIR ABAD TAJAL	
4	Bibi Shaheen	Sr. PST	GGCMS FAQIR ABAD TAJAL	
5	Saima Naz	SST-Gen	GGCMS FAQIR ABAD TAJAL	
6	Riffat Ara	PSHT	GGPS GULI BAGH	
7	Gulnaz	PSHT	GGPS Anyatabad	0345-9628949
8	Rani Gul	PST	GGPS Lammi Battal	0300-7059470

Note: In case of emergency APO at S.No. 1, will act as Presiding Officer.

### Polling Officers

S.No	Name	Designation	School /Deptt.	Contact No
1	Bibi Zahida Mahjabeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
2	Sameena Tamkeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
3	Tehmina Gul	PSHT	GGPS MANSEHRA NO.3	3155819465

### TRAINING SCHEDULE

*Attested*  
*Rahfar* Date 23-05-2015 Time 8:30 am Venue Government Higher Secondary School No. 1 Mansehra.

Please ensure your attendance in the training.

*Attested*

**BEFORE THE HONORABLE HIGH COURT PESHAWAR  
BENCH ABBOTTABAD**

Annex K

COC No. 69/A-2013

W.P. No. 92-A/2013

Mst. Rani Gul..... Petitioner

**Versus**

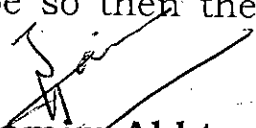
DEO (F) Mansehra..... Respondent

**WRITTEN REPLY OF SHOWCAUSE NOTICE FILED UNDER THE ABOVE  
COC, BY RELEASING THE SALARY OF THE PETITIONER.**

**Respectfully Sheweth.**

1. That the respondent is a straight law-abiding person and she knows the status and respect of this Honorable High Court.
2. That, complying with the directions and order this Honorable High Court dated 2.8.2013, the respondent proceeded for the verification of the testimonial/educational documents of the petitioner as a pre-condition before the drawl of her salary.
3. That soon after the verification of the said documents, the respondent has released the salary of the petitioner, besides the outstanding amount of the arrears has also been processed before the District Accounts Officer Mansehra. (Verification of documents as annexure A and B, as well as the arrear pay bill as annexure C.)

That the respondent cannot even imagine of the violation any order or commit any contempt of this Honorable Court, but if it has been deemed to be so then the respondent tenders for unconditional apology.

  
**Shamim Akhtar**  
**District Education Officer**  
**(Female) Mansegra**  
**Respondent**

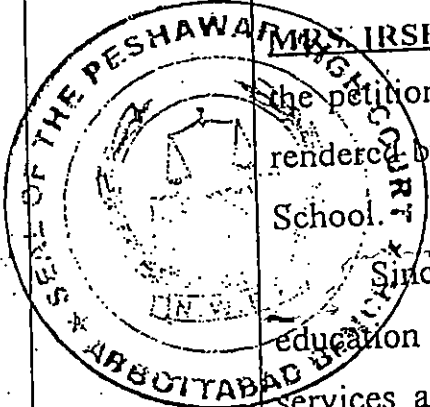
**FILED TODAY**

367  
 Certified to be True Copy  
 Additional Registrar  
 Peshawar High Court  
 Abbottabad Bench  
 Authorized Under Section 5 Acts Ordinance  
 9/12/13

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM 'A'  
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
02.08.2013	<p><u>C.M No.434-A/2013 in W.P No.592-A/2013.</u></p> <p>Present: Malik Ashfaq Ahmed Jillani, Advocate, for applicant.</p> <p style="text-align: center;">***</p> <p><b>MRS. IRSHAD QAISER, J:-</b> Through the instant C.M, the petitioner seeks release of her salary for the services rendered by her in the capacity as teacher of Government School.</p> <p>Since, the petitioner is a regular employee of education department and she has been rendering her services as teacher, therefore, she should be given her salary for the services rendered by her. Thus, in the interest of justice, the respondents are directed to release the salary of the petitioner forthwith till disposal of the main writ petition.</p> <p>The office is directed to fix the main writ petition soon after summer vacation.</p> <p>This C.M is disposed of in the above terms.</p> <p style="text-align: right;">SD: JUDGE</p>



Certified to be True Copy

02.08.13  
Peshawar Court  
Abbottabad Bench  
Authorized Under Sec 75 Act, Ordinance

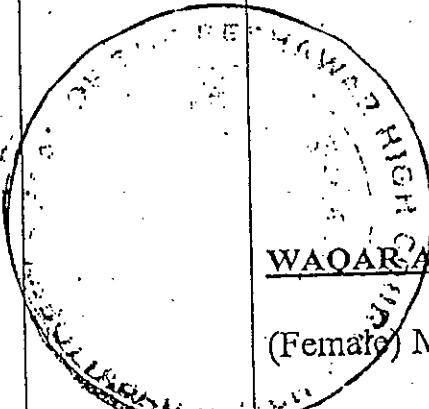
PESHAWAR HIGH COURT, ABBOTTABAD BENCH

P-43

Annex L

FORM 'A'  
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
25.02.2014	<p><u>COC No. 69-A/2013 in W.P.No.592-A/2013 &amp; CM.No.434-A/2013.</u></p> <p>Present: Malik Ashfaq Ahmed Jillani, Advocate along with applicant.</p> <p>AAG along with Shamim Akhtar DEO (Female) Mansehra.</p> <p>***</p> <p><u>WAQAR AHMED SETHI</u>:- Shamim Akhtar, DEO (Female) Mansehra present in Court submitted pay bill of the petitioner. According to which the pay bill has been prepared till 28.02.2014. The petitioner is directed to receive the same.</p> <p>In light of the above, the show cause notice issued to respondent on 12.11.2013 is hereby recalled and the COC is disposed of.</p> <p><u>Announced.</u> <u>25.02.2014.</u></p> <p style="text-align: right;">SD JUDGE</p>



Certified to be True Copy  
1. 05/3/14  
Peshawar High Court  
Abbottabad Bench  
Authorized Under Section 76 of the Courts Act, 1973

# وکالت نامہ

بعدالت جناب سر جسٹس ٹریبونل K.P.K بمبائے  
رانی گل نامہ حکومت K.P.K بمبائے کے لئے

منجانب ایملہ منٹ  
دعویٰ یا جرم سوس ایملہ  
باعث تحریر آنکہ

مندرجہ بالا عنوان میں اپنی طرف سے بیروی وجواب دی نامہ عدالت سابقہ عدالت کے لئے عبد العزیز  
خان (میں نے یہ دعویٰ کی ہے) بدیں شرط وکیل مقرر کیا ہے میں ہر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا ہوں گا

اور بوقت پکارے جانے پروکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری  
کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہو گئے نیز وکیل صاحب

موصوف صدر مقام پچہری کے علاوہ کسی اور جگہ پچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہوں  
گے اور اگر مقدمہ مقام پچہری کے کسی اور جگہ ساعت ہونے پر بروز پچہری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی

نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ  
ہو گئے کہ مجھے کل ساختہ پرواختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست

اجراء ڈگری و اپیل، نگرانی، نظر ثانی دائر کرنے نیز روپیہ وصول کرنے اور رسید دینے اور دخل کرنے کا ہر قسم کا بیان دینے اور  
سپردہ نشی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری

یکطرفہ درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا ہنگی علیحدہ بیروی  
مختیار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا پیرسٹر کو بجائے اپنے ہمراہ

مقرر کرنے اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے 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 کرے اور ایسی حالت

میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا لہذا مختیار نامہ لکھ دیا ہے کہ یہ سندار ہے مضمون مختیار نامہ سن  
لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

المرقوم کا 20/07/01

الع ب د الع ب د الع ب

رانی گل PST ایملہ منٹ Accepted

Accepted





**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

W.P Province  
Service Tribunal

Diary No. 1285

dated 12/11/2015

In the matter of  
Appeal No. 746/2015

RANI GUL..... (Applicant)

Versus

Govt of Khyber Pakhtunkhwa through Secretary  
Education, Peshawar and others.....  
(Respondents)

**Application for permission for filling amended  
appeal in view of the Modification in the final  
order i.e conversion of penalty from dismissal  
to removal from service vide order dated  
25.08.2015.**

Respectfully Submitted:

1. That the above noted appeal is pending adjudication before this Honorable Tribunal and is fixed for hearing on 21.01.2016, at Camp Court Abbottabad.
2. That the appellant request for allowing necessary amendment in the following ,manner inter alia on the following grounds:-

**Grounds of Application**

- A. That the appellant has in the titled appeal challenged the order dated 03.03.2015, vide which she has been dismissed from service. Before approaching the Honorable Tribunal, the appellant also submitted the mandatory departmental appeal on 10.03.2015, however the same was not responded till 90 days, hence the appellant filed the titled appeal.

B. That now during the pendency of the titled appeal the Appellate authority has issued notification dated 25.08.2015, whereby the departmental appeal of the appellant has been rejected, however her Penalty order issued by the DEO Female, Mansehra vide order dated 03.03.2015, is modified to the extent of conversion of Penalty of dismissal into Removal from service. *(Copy of the order dated 25.08.2015, is attached)*

C. That in light of the said modification and to avoid future complications, it is necessary to amend the titled appeal to the extent of challenging the order dated 25.8.2015. ←

D. That there is no legal impleadment in allowing such permission, rather the interest of justice would best be served.

*It is, therefore, humbly prayed that on acceptance of the instant application the appellant may please be allowed to file amended appeal in view of the issuance of final order whereby the penalty of dismissal from service was converted to removal from service vide order dated 25.08.2015.*

Appellant

Through

Abdul Saboor Khan

&

Malik Ishfaq Ahmad Jilani  
(Advocates, High Court)

### Affidavit

I do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal.

**ATTESTED**

Dated: \_\_\_/11/2015



Deponent

Appeal No  
746

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst Rani Gul, PST at Government Girls Primary School Manjani District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1946-55 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. She belongs to U/C Bher Kund, where one post of PST was lying vacant. No record regarding her appointment was found hence her name was also not provided in the merit of her U/C. She was appointed at GGPS Monjhani through single order/corrigendum vide a continuation order Endst: No.1120-29 dated 20/06/2012.
2. Appeal may be rejected with the remarks that she was appointed out of merit. No record was provided regarding her appointment on merit.

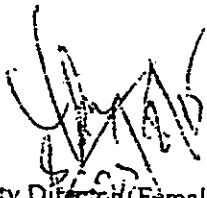
NOW, THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (a) and keeping the findings/recommendations of the committee into consideration, rejects the appeal of aforesaid sacked teacher for reinstatement, however her dismissal order issued by the DEO (F) Mansehra vide order No. 1946-55 dated 03/03/2015 is hereby converted into removal from service.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4389-24 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/5/2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Mansehra
2. District Accounts Officer Mansehra
3. Sub Divisional Education Officer (Female) Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

  
Deputy Director (Female)  
Directorate E&SE, KP  
Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE**  
**TRIBUNAL-PESHAWAR**

**Amended Appeal No. /2016**

MST Rani Gul .....APPELLANT.

VERSUS

1. Govt Khyber Pakhtunkhwa (KPK), through Secretary Education KPK  
Peshawar, and Others

.....RESPONDENTS

**WRITTEN REPLY ON BEHALF OF RESPONDENTS 1,2AND 3.**

---

Respectfully Sheweth:

**PREIMINARY OBJECTIONS:**

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appeal is not maintainable in its present form and also the present circumstances of the issue.
3. That the appellant has not come to the court with cleans hands.
4. That the appellant is estopped by his own conduct to file the instant appeal.
5. That the appeal is groundless, and based on malafide and ulter motive.
6. That the appeal is based on false and malafide intention hence liable able to be dismissed.
7. That the respondents have not violated any law/policy/rules.
8. That the instant appeal is filed just to pressurize the respondents.
9. That the appellant has concealed the material facts from this honorable Tribunal.
10. That the appeal is badly time barred.

## FACTUAL OBJECTIONS

1. Para No.1 is relate to the Academic and Professional Qualification of the appellant hence no comments.

2. Para No.2 is correct.

3. Para No. 3 is incorrect, <sup>as stated.</sup> Need proof.

4. Para No. 4 is incorrect. That the appellant was not qualified candidate for appointment, whereas the appointment order of appellant illegal and against the recruitment policy. Such type of illegal and irregular appointment the higher authority was

conducted an inquiry against the appointing authority i.e. Mr.

Umer Khan Kundi the then Executive District Officer (E&SE)

Mansehra, whereupon the appointing authority was removed

from service on the charge of illegal and irregular appointment

Orders. That the appointing authority was conducted District

selection committee for appointment of PST against the vacant

post in according to relevant record one post of PST was lying

vacant at union council Bherkund, "where the appellant belongs "

but she was appointed in <sup>adjacent</sup> ~~adjacent~~ union council by the

concerned authority. ~~in~~ <sup>to</sup> According with the report of inquiry

3

Committee "her order was issued by EDO E&SE Mansehra who has

indicated that the DSC has approved the appointment of the candidate. Her

name is not traceable in the merit list of her own union council as she was

appointed in adjacent union council, hence the appointment order is illegal

and against the recruitment policy" **(Copy of inquiry report is annexed**

**Annexure A)**

5. Para No. 5 is correct to the extent that a salary of the petitioner for the working period was released by Honorable Peshawar High court bench Abbottabad.

6. Para No.6 is incorrect as stated performing of election duty doesn't validate & legalize the illegal appointment.

7. Para No. 7 is incorrect , on the basis of inquiry report the appellant was served a showcase notice, and afterword appellant was dismissed from service on vide Endst no 1946-55 dated 03-03-2015 by the District Education Officer (Female) Mansehra.

**(Copies of showcase & Dismissal Order are attached as Annexure G (Page No 30) and Annexure I of Appeal).**

8. Para No. 8 is incorrect, after adopting codal formalities and rules the appellant was dismissed from service. The reply was not satisfactory.

9. Para No.9 pertains to record hence no comments.

10. Para No. 10 is correct to the extent that the respondent department was observed the codal formalities whereupon the dismissal order was issued by the DEO (F) Mansehra.

11. Para No. 11 is correct to the extent that the appellant was filed an appeal before appellant authority i.e Director E&SE Khyber Pakhtun Khawa Peshawar against the dismissal order, whereupon on the bases of the appeal the Departmental authority converted the dismissal int to removal.

12. Para No.12 is incorrect as stated detail reply have already been given in above paras.

13. Para No. 13 pertains to judicial record, further solid/ genuine ground against the said appeal as under.

### **GROUND.**

A. Para A is incorrect hence denied the act of respondent is in accordance with rule & policy.

B. Para B is incorrect, that the removal from service order was issued after adopting codal formality.

C. Para C is incorrect as stated the respondent Department is bound to obey the rules as per provided by the Government of Khyber Pakhtun Khawa , the removal from service order was issued after fulfilled the procedure prevailing by the Government.

D. Para D is incorrect hence denied.

e. Para e is incorrect, the appointment was issued by the then Executive District Officer E&SE Mansehra, where upon the inquiry was conducted and the order appellant was declared on the basis of appointment in adjacent union council against the recruitment policy, on the basis of said inquiry the appellant was removal from service after fulfilling codal formalities.

f. para f is incorrect as stated, hence denied.

g. Incorrect hence denied.

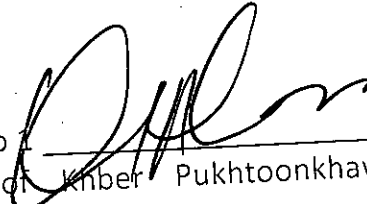
h. para h is incorrect hence denied. Detailed reply has already been given in above para.


i. Para is incorrect as stated, Detailed reply has already been given in above para

J. No comments respondents seeks permission for addressin other ground besides mentioned above.

Prayers.

It is therefore humbly prayed that this on acceptance of above para wise comments the present appeal graciously be dismissed with cost

Respondent No   
Government of Khber Pukhtoonkhaw through Secretary Education Civil  
Secretariat Peshawar.

Respondent No 2   
The Director E&SE Education Department KPK Peshawar

Respondent No 3   
District Education Officer (Female) Mansehra



B

**AFFIDAVIT**

I, Mis. Shamalia, ADEO District Education officer(F) Manserha, do hereby solemnly affirm and declared that the contents of reply in the instant Appeal No 746/15 titled case Ravi Gul versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this honorable court.

  
RESPONDENT



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the February 27, 2014

7

(9)

NOTIFICATION

NO.SO(S/M)E&SED/4-17/2013/Umar Khan DEO:

**WHEREAS** Mr. Umar Khan Ex-Executive

District Officer (BS-19), E&SE/ District Education Officer Male-Mansehra (now District Education Officer Male Karak) was proceeded against under the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. **AND WHEREAS** inquiry committee was constituted comprising the following officers to conduct formal inquiry against the accused officer, for the charges leveled against him in accordance with the rules.

- i. Syed Hidayat Jan, (PCS SG BS-20), Special Secretary, Agricultural Department, Khyber Pakhtunkhwa Peshawar (now Secretary Zakat, Usher, and Social Welfare Department).
- ii. Mr. Khallaq Baig Principal BS-20, RITE Male Haripur

3. **AND WHEREAS** the inquiry committee after having examined the charges, evidence on record and explanation of the accused officer has submitted the report.

4. **AND WHEREAS** a show cause notice was served upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) dated 25-12-2013 circulated to him on 01-01-2014.

5. **AND WHEREAS** the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after having considered the charges and evidence on record, inquiry report, explanation of the accused officer in response to the Show Cause Notice and personal hearing granted to him by Secretary Establishment Khyber Pakhtunkhwa on behalf of Chief Minister Khyber Pakhtunkhwa on 14-02-2014 at 1100 hours, is of the view that the charges against the accused officer have been proved.

6. **NOW, THEREFORE**, in exercise of the powers conferred under section 14 of Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of "**Removal from service**" upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) with immediate effect.

SECRETARY

Endst: of Even No. & Date:

Copy forwarded to the: -

- 1- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- PSO to Chief Minister Khyber Pakhtunkhwa Peshawar.
- 3- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 4- District Education Officer (Male), Mansehra/ Karak.
- 5- Mr. Umar Khan District Education Officer Male (BS-19) District Karak.
- 6- District Accounts Officer Mansehra/ Karak.
- 7- PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 8- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 9- PS to Special Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 10- Office order file.

(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)

DECISION:  
DURING THE YEAR 2012 AND 2013 IN OFFICE OF ... EDO, ELEMENTARY AND  
SECONDARY EDUCATION, DISTRICT MANSEHRA APPOINTMENTS OF FEMALE  
TEACHERS IN VARIOUS CADRES WERE CARRIED OUT PURSUANT TO AN  
ADVERTISEMENT PUBLISHED IN DAILY AAJ DATED: 20-05-2011, WHEREIN CERTAIN  
IRREGULARITIES/ILLEGALITIES IN VIOLATION OF RULES AND PRESCRIBED  
PROCEDURE WERE NOTED, THEREBY RESULTING IN BREACH OF MERIT/ILLEGAL  
PRACTICE AND IGNORING THE RIGHTFUL CANDIDATES.

1. The Competent Authority has constituted the enquiry committee, comprising the following officers vide Notification No: SO(S/M)S&SED/4-17/2013 to conduct formal enquiry against Mr. Umar Khan Ex-EDO (E & SE) (BS-19) Mansehra now DEO(M) Haripur and Miss. Shamim Akhtar Deputy DO (E & SE) Mansehra (BS-18) and others for the charges mentioned in the charge sheet and statement of allegations(**Annex-A**)

**SAYED HIDAYAT JAN** (PCS SG BS-20), Special Secretary, Agriculture Department,  
Khyber Pakhtunkhwa, Peshawar.

**MUHAMMAD KHALAQ BAIG**, Principal (BS-20) R.I.T.E (M), Haripur.

2. Both the accused officers i.e. Mr. Umar Khan, Ex-DEO (E & SE) , Mansehra and Miss. Shamim Akhtar, Deputy District Officer(E & SE) , Mansehra have been charge sheeted as under:

- a. The accused Mr. Umar Khan Ex-DEO (M) (E & SE) Mansehra presently posted as DEO(M) Haripur

- i. That while posted as DEO (M) Mansehra (BS-19) committed the following irregularity (**Annex-I**)

**MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.**

- b. Mst. Shamim Akhtar Deputy District Officer (BS-18) Female (E & SE), Mansehra

- i. That while posted as Deputy District Officer (BS-18) (Female) (E & SE), Mansehra, committed the following irregularity (**Annex-II**)

**MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.**

3. **Venue of Enquiry:**

The enquiry was conducted in the office of Dy. DEO (Female) Mansehra.

4. **PROCEEDINGS:**

1. The committee informed both the accused officers vide No. PS/SSA/Enquiry /2013 Dated 5/7/2013. The District Accounts Officer Mansehra was also asked to provide copies of appointment orders of the teachers quoted in subject enquiry (**Annex-III**)

Copies of Charge sheets and Statements of allegations which were already sent to the other officers by the Department were re-submitted to them with the directions to submit their replies in the stipulated time.

The committee visited the office of DEO (Female) Mansehra on 01/8/2013 to conduct enquiry. Mr Umar Khan Ex EDO (E & SE ) Mansehra and Miss Shamim Akhtar Dy. DEO (female) Manshera were present alongwith their staff and attended the enquiry proceedings (**Annex-IV**)

8. The Present DEO (M) and Dy. DEO (F) Mansehra were asked to provide all the record /files and other related record mentioned in the letter to the committee on the day of enquiry vide. No: SS (AD) Enquiry/2013 Dated 01/08/2013 **(Annex-V)**.

9. The enquiry proceedings continued on daily basis w.e.f 01-08-2013 and on the very second day, one of the accused Mr. Umar Khan, insisted on his designation as recorded in his reply to the Charge sheet/statement of allegations submitted to the committee, claiming that he had not served as DEO (Male) Mansehra during the year 2012 rather he had served as EDO(E & SE)Mansehra. Despite persuasion by the committee regarding factual position of the designation as contained in the Education Department Notification No: SO(S/M E&SED/3-2/2012/Management Cadre dated: 28-12-2012, he was still adamant not to change his stance. **(Annex-V (A))**.

On account of this, the committee immediately informed and requested the Administrative Department for rectification of the designation of the accused as contained in the charge sheet/statement of allegation vide letter No: SS (AD) Enquiry/2013 dated: 02-08-2013 and subsequent reminder of even number dated: 17-08-2013 **(Annex-V(B-C))** viz a viz reminder to the department from the Chief Minister Secretariat, vide No: SO-1/CMS/KPK/3-1/2013/3514 dated: 27-08-2013 **(Annex-V (D))**.

The proceedings remained continued until the same were adjourned due to falling of Eid-Ul-Fitr Holidays, Independence day, coupled with appearance in the PHC by Chairman of the enquiry committee in an official case and proceedings on leave by most of the concerned staff of the office of DEO(F), Mansehra as well. The same were, however, resumed w.e.f 16-08-2013 and since action on rectification of designation of the accused couldn't be communicated to the committee, therefore, the Administrative Department was again reminded for early needful as well as granting an extension of two weeks vide letter No: SS (AD) Enquiry/2013 dated: 27-08-2013 **(Annex-V (E))**.

The Education Department vide their letter No: SO(S/M)E&SED/4-17/2013/Umer Khan dated: 02-Sept. 2013 intimated that a summary for rectification of the designation of the accused in the charge sheet /statement of allegation was moved to the Chief Minister, Khyber Pakhtunkhwa/Competent Authority. Similarly an extension for further two weeks w.e.f 27-08-2013 was also allowed vide letter quoted ibid **(Annex-V (F))**.

## **FACTS**

### **REPLIES TO THE CHARGE SHEET:**

#### **REPLY OF MR UMER KHAN TO THE CHARGE SHEET:**

10. Mr. Umar Khan EX- EDO E&SE Mansehra in his reply of charge sheet sent to the committee through registered cover vide NO:7475-76 Dated 27/07/2013 *has taken the stand that he had not served as DEO (M) BS-19 Mansehra during the period 2012 but worked as EDO E&S BS-19 Mansehra w.e.f.01/03/2011/to 31/12/2012*. He added that in the charge sheet it has been recorded that he while posted as DEO(M) BS-19 Mansehra committed the irregularities of making illegal appointments of female teachers during the year 2012& 2013 in violations of rules and prescribed procedure in District Mansehra whereas he had not worked as DEO Male Mansehra during the said period. He further added that he was neither an authority for appointments for female side nor made even a single appointment of female teacher in capacity of posting as District Education Officer BS-19 (M) Mansehra and hence question of making illegal appointments of CT,DM,PET,AT,QARI, PST(Female) during the year 2012 and 2013 in violation of rules and prescribed procedure does not arise. He requested for the exemption from the charges and with-drawl of charge sheet from him **(Annex-VI)**.

S.No.3 of the merit list has been appointed where as the applicant was at S.No.3. It is astonishing that appeal was received on 13.07.2012, but the appointment order was issued on 31.05.2012 i.e 02 months earlier than appeal. ((Annex- LX, A,B, C & D).

Rani Gul D/O Dildar Tanoli	Merit list No. Nil	Endst:No.117 0-79: Estt:/Apptt:PS T/2011-12 dated 20.06.2012. Appointed at GGPS Monjahni in BPS-7	Her order was issued by the EDO E&SE Mansehra who has indicated that the Departmental Selection Committee has approved the appointment of the candidate but no such record was produced / available on the file. Her name is not traceable in the merit list and in the selection process ((Annex- LXI)).	The appointment order is illegal and against the recruitment rules/ policy.
Shahida Bibi D/O Abdur Rahim r/o Sawan Maira	Nil	Endst:1110-19: Estt:/Apptt:PS T/2011-12 dated 20.06.2012. appointed at GGPS Gali Namshera in BPS-7	Her appointment was issued on the <b>acceptance of appeal</b> by EDO E&SE Mansehra. No record of appeal is available in the office file. No DPC Minutes / working papers are available. ((Annex- LXII).	The appointment order is illegal and against the recruitment rules/ policy.
Rubi Sarfraz D/O Sarfraz	UC Shoukat Abad	Endst: No.4713-23: Estt:/Apptt:PS T/2011-12 dated 26.07.2012. appointed at GGPS Single Kot in BPS-7	Her appointment order was issued on <b>acceptance of appeal</b> by Mr. Umer Khan Kundi EDO E&SE Mansehra. She was appointed at GGPS Singal Kot U.C Oghi. No post was vacant in her own U.C. her appointment in other Union Council is also invalid / against the recruitment rules and policy. The appointment order was issued without working papers or minutes or DSC. ((Annex- LXIII).	The appointment order is illegal and against the recruitment rules/ policy.
Uzma Sarfraz D/O Sarfraz R/O Ghanool	Nil	Endst:No.683 0-39 Estt:/Apptt:PS T/2011-12 dated 31.05.2012. appointed at GGPS Badal Gran in BPS-7	Her appointment order was issued on <b>acceptance of appeal</b> by Mr. Umer Khan Kundi EDO E&SE Mansehra. Her name was not available in the merit list or in EATEA Test. No working paper/DSC/Proper procedure was adopted to decide the	The appointment order is illegal and against the recruitment rules/ policy.

*[Handwritten signature]*

*[Handwritten signature]*

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13

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.**

**NOTIFICATION.**

WHEREAS, Mst Rani Gul, PST at Government Girls Primary School Manjani District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1946-55 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. She belongs to U/C Bher Kund, where one post of PST was lying vacant. No record regarding her appointment was found hence her name was also not provided in the merit of her U/C. She was appointed at GGPS Monjhani through single order/corrigendum vide a continuation order Endst: No.1120-29 dated 20/06/2012.
2. Appeal may be rejected with the remarks that she was appointed out of merit. No record was provided regarding her appointment on merit.

NOW, THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (a) and keeping the findings/recommendations of the committee into consideration, rejects the appeal of aforesaid sacked teacher for reinstatement, however her dismissal order issued by the DEO (F) Mansehra vide order No. 1946-55 dated 03/03/2015 is hereby converted into removal from service.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

4349-24  
Endst: No. \_\_\_\_\_ /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

Copy of the above is forwarded for information & n/action to the

1. District Education Officer (Female) Mansehra
2. District Accounts Officer Mansehra
3. Sub Divisional Education Officer (Female) Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

Deputy Director (Female)  
Directorate E&SE, KP  
Peshawar

**VAKALAT NAMA**

NO. \_\_\_\_\_/20

IN THE COURT OF Service Tribunal Peshawar

Rani Gul

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Education Dept: etc

(Respondent)  
(Defendant)

I/We, Rani Gul (Appellant)

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/20

Rani Gul  
(CLIENT)

ACCEPTED

M. Asif Yousafzai  
**M. ASIF YOUSAFZAI**  
Advocate Supreme Court  
Peshawar.

**Taimur Ali Khan**  
Advocate High Court

Syed Nauman Ali Bukhari  
**Syed Nauman Ali Bukhari**  
Advocate

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
Cell: (0333-9103240)

**NO OBJECTION CERTIFICATE**

I, **Muhammad Arshad Khan Tanoli, Advocate High Court, Abbottabad**, affirm and declare that I have no objection if appellant (Mst. Rani Gul) engages another counsel and my dues towards appellant are clear.

Dated: 21/12 /2016

  
**Muhammad Arshad Khan Tanoli**  
**Advocate High Court, Abbottabad**

**Muhammad Arshad Khan Tanoli**  
**Advocate High Court**  
**Office No. 33-Adjacent to**  
**Dist. Bar Abbottabad**

cell no. 0346-9588583