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

- hairman

Camp court, A/Abad,

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, Supdtalongwith 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 Appellant Deposited Security & Process Fee 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.

Form- A FORM OF ORDER SHEET

Court of		•		
Case No	٠	٠.	746/2015	

	Case No	<u>/ΨØ2015</u>			
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate			
1	2	3 .			
1	06.07.2015	The appeal of Mst. Rani Gul presented today by M			
2	10->-15	Abdul Saboor Khan Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order. REGISTRAR This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon 24-7-15			
		CHAIRMAN			
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BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Amended	Appeal No.	/2016
Mst. Rani Gul, PST, Tehsil & District, Mansel	, **.	
	5.450 	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	28-	"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	310	"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	

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(Multanrinad Arshad Khan Tanoli) Advocate High Court, Abbottabad

> Muhammad Arshad Khan Tanoli Advocate High Court Office Not 33 Adjacent to

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Amended Appeal No. 746 /2016

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

...APPELLANT

VERSUS

- Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
- 2. Director, Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
- 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 Monihani 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").
- appellant was continuously 7. That the 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 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").
- 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").

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").

GROUNDS;

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.
- 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.
- 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.
- 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

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.
- That no proper procedure has been h. 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.
- 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 03/03/215 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.

Ranifyel ...APPELLANT

Through

Dated: /2016

(Muhamma Arshad Khan Tanoli Advintation Idight Gottat, Indibottabad 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. Ra	ıni Gul, PST, Tehsi	l & District, Mansehra.	
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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.

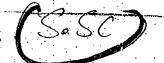
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Identified by;

Muhammad Arstart Rehigh Fambli)
Advocate High County, Application



132338 Board of Intermediate & Secondary Education



ABBOTTABAD DETAILED MARKS CERTIFICATE Secondary School Certificate Examination (GENERAL GROUP)

Session 200 D (Annual/Supplementary) Father's Name D. R. Ja

SUBJECT	Marks Allotted	MARKS OBTAINED	
1. English 2. Urdu 3. Islamiyat Comp.	150/ / 150 (97) JoB SECRET FICE	
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Board of Intermediate & Secondary Education

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Muhammad Arshad Khan Janoli Advocate High Court Office No 33 Adjacent lo

TE & SECONDARY EDUCATI redificate Exomina







BC RD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD Sr. No. Z1.7905....

DETAILED MARKS CERTIFICATE
Higher Secondary School Certificate Examination

Part-II.

Name: RANI GUL

Father's Name : DILDAR HUMANITIES

Session: 200

Roll No:

					34/3	<u> </u>
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Checked By:

Date: 31-January, 2004

Controller of Exprimations

Board of Intermediate & Secondary Education

Abbortabad

Note: Errors / Omissions excepted

Multemmad Arshad Khan Tanoir Advocate High Court & Office Not 33 Adjace at to

BoA

SNo: 3772



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: Manschra

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I. Part I Marks	285	Marks Obtained Marks In	THE PERSON NAMED IN COLUMN TWO IS NOT SECULAR TO SECURATION TO SECURATION TO SECURE TO S	1
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5. Islamic Studies	75	44 Forty-Four	Pass	
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Prepared by: M. Auri Chang Thecked by:

Controller Examinations Hazara University, Manselira December 25, 2005

Attested

Advocate High Court Office No: 33 Adjacent C

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SNo: 1832

MANSEHRA, NWFP, PAKISTAN

DETAILED MARKS CERTIFICATE

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

Roll	No	:

Name:

District

MANSEHRA

Institution/

04-P-870 · Reg No:

F/ Name: Dildar Tanoli

Subject:

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Division:

SECOND

Print Oate: 04-01-2011

Checked By:

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

Controller Examinations Hazara University, Mansehra

January 04, 2011 ERIFIED BY

Controller of Examination Hazara University Manachi

Muhammadershad Khammandil Advocate High Count Office No. 33 Adjacent to TOT ANHAHAHAA



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

23/0/3

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

Assistant Controller of Samulations Confficate Section Alian's Iqual Open University Islamabad.

<u>Eu</u>

Advocate High Court

Mos); DECOHIE

ISLAMABAD PROVISIONAL RESULT CARD

RANI GUL

Name DIL DAR TANOLI Fathers's Name LDAR TANOLI P/O KHAKI NEAR BY BOMBBY MOSQUE

Tehsil MANSEHRA MANSEHRA District

has successfully completed .

Roll No. Registration No. Final Scmester

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SEPTEMBER Result Declared on

SEPTEMBER 25,2007 Date of issue

Percentage / Grade

Total Marks / Obtained

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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 original record of the university student.

Controller of Examinations
right of privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the

AMA IQBAL OPEN UNI

PROVISIONAL RESULT CARD

Name

RANI GUL DIL DAR TANDLI

Father's Name DIL DAR TANDLI Address TANDLI PZO KHAKI NEAR BY DOMBBY MOSQUE

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

HANSEHRA

District

has successfully completed

BACHELOR OF EDUCATION(B. ED)

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9PR- 12		TEACHING OF URDU	100	67
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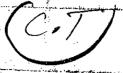
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ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD RESULT INTIMATION CARD

Secral Ma.

E. gistration No.

04NMA0058

Roll Ma.

0888308

Certified that Mr/Ms.

Father's Name

DIL DAR TANOLI

has Successfully Completed the

CERTIFICATE OF TEACHING

programme. The detail of course is as under

Address:-

DILDAR TANOLI BIO EHERT

Semaster	Course Code	Title of the Course	Mai	ks
			Maximum	Obtained
PR-04	0631	DIMENSIONS IN BOUCKTION	100	66
PR-04	663/2	EDUCATIONAL PSYCHOLOGY	100	58
	0633	SCHOOL ORGANIZATION	100	57
in or	េសម	PRACHING STRATEGIES & EVALUATION	100	
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Result declared on Date of Issue:

Movember 21, 2005

December C, 2005

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Percentage Marks

Comproper 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.

بالمالية الأول المراكزة المنظرة والمقدى كالعدولة المتأوار words of the second control of the second second eg Attit 176, 102(2016-111)のアリインがインファンコマーテル كيانا الحدارمال كرد أي وأركى فياد بر اللهاب ك عددكاد كانت بدورة لل كالميك بن الناءز كنر يمرانر الجاش برائدا يزكمان المهار ويزل خال العالم وموسق المهالين كالم مبيها إنه أفحاج الإنتان ايم ايس ا-اكل تسنركنس بنى ويجاش فارزيان برائيريت ليبنز عهاش وترويزه أخل بكنل ززكن しいいとうではいいかとうないができところしていりかりかんなん المت المائية والمكافئة المدين المرق كروي بالدي الدوان كوروان كالمتارية - ن سارتی لیابات کیا۔ عيلياد فيزركمك كالمنا ومناشت يمسر زوه کت این ده کت الدناا 2-6-2011 (-114 1301000 100.و0¹ين (المَّهُ بِرَوْمَنِتُ الرَّبِيَّةُ وَمَا أَمَّرُ كُلُوا الْسُ いっつい いんしょうかい ABP 1/0.102-2010-11] Pre Bid Meeting رور کال کے رفز عل مرود 2011-05- 2 کربرت 11:00 بے آیا۔ میٹک سندور کی میں شرای ن يتدان سدكام كالمتال قراء وتراها مرات وكاور ووكام من حتاق والمدون أوكار الدائرة 1000 وإيات كالدوس بدان شد ما ترفعيل من إن يون وكالأكراب أن الألا وبالناس المدالة ردید باده ذیکی دایدت که دا کرفر آول سے برنگ نر مترکمت مطاوب ہے۔ ۱) ئىندرىلام ئەسىل كىلىغىزىم كىلىزىيىزىكى كىلىدۇنىش ئىندرلىرىلىدۇكاسىنىڭ ئىدىلىكى ئىن 2011 - 201 كالدور المرافز كالرعب كارش في بال خرود كاب عن الل يك مرا مندور في اسد رسياريزات شكك باست. بانتكر الداك دن المناطقة المنابية تك كن الدك- · (۱) كين لوائزوز ده آن ۲ (د كا كال المدار المعال الشيرات الد فيه ال كامل كاملار أد يسترش بمساير : كارم. (در الله المراكب المساول المراكبيد الاستراكبيد الله المراكبيد المراكبيد المراكبيد (con) 7) ئىزدگركىك ئارتارگرلىنىزدىلام بارگانىركابات كاخىزدىلام ئىزوگرگىكى چەرئات آياران ثل ما مل كرا موددى به مدين كيواد والت فود إفراكا سرف بامتوليك كا واوت كا Dering Compact Compagnition for Committee or د) الم كافروف unletting كامرت عن يُنزرك من كالمائي المرازوة الت الدك الكاما أل ت) ، له دکی بر ۱۵ بر سازی است. است در بازی کسی داری از کسی از تاریخ کسید و برای در بازی از بازی کسید و برای در Lored - Brod Lord stopping of the analysis ندائر کارٹن ک رفز بالروائم کری کے اگر جان ایس کے ایمد ذکررہ Hale Analysis ر من المراد الم ل با المادرات إيك نسب كيا مازي . a) نیکسرس کی کانی سریدیة اون مستحت اوک 7) نَيْنُ مِسْكِيدِ مِنْ أَكِي مِلْدَانِ كَانْ مِسْنَ كَوْمَتْ مِنْكَ مِلْدِهِ إِلَىٰ أَمْرِدَتَ مِن فَيْفُر كَ لَل إِلَا يَالْتِ 0) كام كل كوف ي يوفرون كر 100 ما كام كام ويديد جم اكان الافراد والانتسال الم كار ن) الرحمي رأية من قال الروي وفي زوستريد من قرار العاش المناس الدينة ووويد إلى ومراه الديسول 10) مشيرك ارتشر ل كي دارورسياكر يك دارون مينول كانت توكيد دادكان سادل ودكاء 11 كان أو الأو المراكزين و PEC Registration عمل كرقوع 2011 - 12 كان الم (ئ. : با بی نزاندرنز بایم کی که رنزی ادناست ادیم و یکی با یکی یم -

טוֹבְּיָלִינָלּנְלָיָלָנוֹ לָרָטֹּלְנוֹטִי לִנִים לִנִים 2007 ב־7093

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是的证明的原则以外的

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						74		رمياء في تا	زادسان (ئ مرایم یک درکا		2	
	داده زاریال	<u> </u>	্র	6-7-	14	ند. اور د و کیم	لسی شکارر م	ت الرائي	ا) نَهُ تُرِكِ سَيِّعَة مِن مِنْ الم	1330		
				·	ĺ	ىل.س	ران (r)) <u>۔ ا</u> حت ر	ز ، رو شداری س سکندو در مزاد			•
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	(1)	্রি	(; •	11-7-	177	نان _{ا ش} ر	ا ذکری کنا کل	ي إماران	ادا <u>ر مست</u> قر [رارع: آبارار	13365	Ş ji	
	1111	- En	[:،	11-7-	15	م ^{زامت} ! در بررز	ک <i>برایا</i> ک بی طبح	کہداما آرخن)	ع زوی نے برما میزن (سیکند	<u>(1)</u>	! 	
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;	: دپال			19-7- 11	07	المات الجرسان	مر نبلین او	بر257	۱) انترمیزین شیره ادولت	7)ل ایرال		-
			;			رزى	ے۔ بندہ جے	غدادارت. برشون رز	ن کریشن کمی ۲) کمی آن ^{کسا}			ø
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ı	. ••••••	نامر امت ۱۰	パン	~/ 0	10111	101:	பரிப்ப	سال ما	ر رسایار خ ای رسایار کا	ارت بع		
	, , , , , , , , , ,	ノベルル	مل≀ائل.	びそりし	ر و ار زر ا	- يساء . سا	يدكده نسند	ا د ۱۰۰۰ د م	رني (۱۹) اني (۱۹)	ا کینیہ م		
1	; ,		از باز از باز	زادرا شره ات ز≟ر	ر میا. در میا	ئىتىنىڭ دەنگىلا	კალა . პილი	こいえ AVILL	ويرك إذا تكد	كاسناذتن	i 11.	
	ici Viny (cciicliq	دامنت ش. دکان ۱۳۵	· .: /-	ونزرزات	ک انز	نذابختز	ر سیرے من	とおっご	ے بڑے کردا۔ مال کے لئے ان	کرزمنٹ ن من بنہ		
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į	; _ ~		من وا ا	-,	6-111	ما موند ا	(2)	P 3 2 P	ريدن-ايد. ك سدريد إلا رئسنه إلى عرا	$C_{1}C_{1}$. 1	li li	
1		- (1.11)	1,01	را اليام صور ال	41 - T.		4 mars - 26		ر ستان در (۲۸۲۰۱)اه (۲۸ <u>۲</u> ۰۱۵)	161	II II	
				m=0	رادات			Lifer on	ر اوان وماندا مردداماً تشروشه سیست کا کار(1-	:•! C 1.1	1 1	
į	اورون ل ک ک	مغراجيت لا أتحد وتحذيات	ر از این اور از انتخاص کار این است. از این	عن ال تبرلمین	さに. じいり	رل کیوسان دارگیام د	ئے دکت ایا د مراحب تا سف	بروائل <i>آر</i> ند مست یک دکا	isteve ognyv(4)	ا مرزوستره امار اداری		
- 3	ايتمل بها	1017 4	مثال: بمس	ئيت عن	وأشده	ごいさ	رز: ۱۰ یم	ن عرر .	16/10	C . 3.0	H - B	

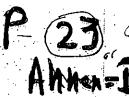
كالمدينة فيم الركال الم كر إنا الماجة ما كالتدافيت على منال معت يركن إعلاهما د. بير يتر سرسل كا باليكا -بر-وي مرف ق، المرد مان كراتون بمن عالي أله 10 C. 200 C = 1 1 1 1 (1) ((1) - F. F.

Office 12 33 Adjacent 12

Advocate High Court

TAT-1 FEMALE MANSEHRA RESULT 2011

13	TATELVIALE	WANSERKA KESULI	2011	HAMO
الر الر الر	Name	Father Name	Marks	%age
	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	BIBLOUL K.NO	M M TARIQ	84	Fail -
1/03109	SAMINA WIBI 13110	KHALID ROSHAN	72	Fail
71703110	RANI GUL	ABDUL SATAR SHAH	176	58.67
	AMINA BIB	M ISMAIL	92	' Fail
	BUSHRA RASHID	GULZAR HUSSAIN SHAH	104	Fail
1703113	BUSHRA JAVAID	DILDAR .	112	Fail
	MEHWISH		108	Fail
1703115	· · · · · · · · · · · · · · · · · · ·		156	52.00
	Mariam Bibi	,	132	44.00
·	Nosheen :	CHRO E COLOR	64	Fail
1703118			- 48	Fail -
1703118		13/		-
1703119			80	Fail
			108	Fail
	BIC!		108	Fail
	Fozia Bibit		136	 > 45.33
	SAIQABIBI		108	Fail
	FARHATNAZ	1 4	164	54.67
	LUBNAASHRAF	المراجع المراج	124	41.33
1703126		•	112	Fail
1703127	TAHIRAPARVEEN		64	Fail
	ZAHIDABIBI		124	41.33
1703129	AZEEM L:		76	Fail
1703130	В		188	62.67
1703131	SANIASARW		112	Fail
1703132	SAHIBZADIAZMATRABBAN		128	42.67
1703133	???N?		68	Fail
1703134	?		128	42.67
1703135	KOUSAR .		116	Fail
1703136	SADIAKANWAL	Δ.	96	Fail
1703137	SAMEENAFARMAN	Attested	128	42.67
1703138	AGMAHAMEED	MICH	80	Fail
1703139	SAIQARAFIQ ¹	M	104	Fail
	MAJIDABIBI	11 11/11/	88	Fail
	0.4.5.71.0.00.4.4		124	41.33
1703142	SHABNAM	Muhammad Arshad Khan Tanoli Muhammad Arshad Khan Tanoli Advocate High Court	112	Fail
	?IBIANIQARANI	Julia Mad Arshad Khall Land	60	Fail
1703144	SHAHNAZ	Advocate High Count to	44 .	Fail
	SH?SHADBEGUM	Advocate 33 Adjacent	52	Fail
·	FOZIABIBI	Mine Jak	116	Fail
1703147			92	Fail Fail
1703148			80	
1703149				Fail
	RUBANAGUL		100	Fail -
	TAHIRABIBI		136	45.33
	A?I?HALEEMA		76	Fail
	AMINAREHMAN		116	Fail
		···	128	42.67
	BIBIMARYAQAZI		116	Fail
	NAHEEDABIBI		68	.Fail
1703156 r	· 	4:	64	Fail
	VAILABIBI		168	56.00
1703158 N	JOKEEN .		76	Fail
1703159	101	1/2/	152	. 50,67
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SE OF THE EXECUTIVE DISTRICT OFFICER ESS EDUCATION MANSFEIDA

ON DER

As approved by the Departmental Schooline 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 avionihant to BPS-7 @ Rs.5500-320-15400 per plus usual allowances as admissible under the rules in the interest of Public Service with effect from the deep of their taking over charge subject to the following terms & conditions:

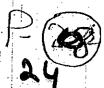
TERMS & CONDITIONS:

- 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.
- 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. Fie/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.
- The release of the pay by the concerned DDOs will be subject to the receipt of verified accountents by the appointing authority / (EDO Recold Admisshra)²⁴
- 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.

6. His/her services are liable to termination on one month prior notice from either side in ease of resignation without prior notice, his/her one month pay/allowances if any shall be interfeited to Government Treasury.

Advocate High Court
Office No: 33 Adjacent to

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- His/her services can be terminated at any time in case his/her performance is found unsatisfictory; he/she will be proceeded against under the removal from service under E&D E 1168
- 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 1st July 2001 in pervious post, his/her
- 13. No. TA/DA etc is allowed.
- 14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi) E&S EDU: MANSEHRA

Endst: No 11 10 - 7%	
Endst: No. 1120-21/Estt: Apptt:PST//2011-12 Dated Mansehra the 2	
L. Samuel Manschra the ?	3/ <i>L</i> ,
2 Discretary to Govt: of KPK FASE Day	1-
1. Secretary to Govt: of KPK E&SE Department Peshawar. Director E&SE Department KPK Peshawar. District Accounts Officer M.	
~ 100 101 D 00 0 1	
4-5 District Officer (M&F) Local Office 6-7 Deputy District Officer (F	
8. PA to Pro-	•
6-7 Deputy District Officer (Female & Manschra) 9. Budget & A. A. Budget & A. A. Budget & A. B.	:

PA to District Coordination Officer, Manselna. Budget & Accounts Officer, local office, Manschra. 9. 10. Candidates concerned.

Advocate High Court Office Not 33 Adjacent Diet Bar Ahhou

Attestal

EXECUTIVE DISTRICT OFFICER E&S EDU: MANSEHRA

order issued by their EDO una Khan Kind CM No. 434A in WP No. 592-A.

Le chighcourt directed That 5) pertiotioner hence

Manshra

Sit.

?#,

Pers #: 00712174 Buckle:

Name: RANĮ GUL

Dsg.: PRIMARY SCHOOL TEACHER

CNIC No.1350368607390

GPF Interest Applied

12 Vocational Temporary PAYS AND ALLOWANCES:

5002-Adjustment House Rent

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:

4200-Professional Tax

Total Deductions

D.O.B

24.06.1984

02 Years 10 Months 006 Days

P Sec:001 Month: April 2015

MA7044 -Dy D O (F) Pry Edu Mansehi

Min: Education Schools

NTN:

GPF #:

Old #:

MA7044

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653,00

1,600.00 800.00

8,000.00

16,936.00

Subrc:

100.00

100.00

16,836.00

LFP Quota:

HABIB BANK LIMITED

SHINKIARI ROAD, MANS

7900259303

Mukanhad Arshad Khar Lang Office Not 33 Adjaceur to Manshra

S#:

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 P Sec: 001 Month May 2015 MA7044 Dy D O P

Dry du Mansehr Min: Education Schools

NTN:

GPF #:

Old #:

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 7900259303

SHINKIARI ROAD, MANS

Advocate High Court Office Not 33 Adjacent to

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数点的表示。 Pers #: 00712174

RANI GUL Name:

PRIMARY ELECTED TO CHEET.

CNIC No. 13500668607390 GFF Interest Applied

12 Vocations Tumpus &

PAYS AND ALLOWING CE

5002-Adjustment moves cont

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Office No 33 Add

Election duty 2013

OFFICE OF THE RETURNING

Hational Assembly -20 troy mee Knyber pakhtoonkhwa-56 127___

Date 74, 1, 2013

OFFICE MEMORALDUM

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 Californ are hereby made.

desting Station 301 Government Girls Middle Seirnel Chinar Kot (Combined) for election to the National Constituency No: NA-20 Manschra-L PK-56, Mansehra-IV.

Late on the Little May 2013

\cdot . To be held on the 4	1" (May 2015.	e de la companya de	and the same of th) :
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Note: The Presiding Officer is directed to bring his two passport size photographs and to make sare the attendance of polling staff positively within time.

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上(15,05,20)13。 Venue: Government Commerce College & Llanagement Sciences, Mansehra.

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Returning officer	. Returning Officer
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PK-56 Manachra-IV - 🦪 👂	
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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
	Nazia Abbasi	SS	GHSS Phulra	O3219814901

Assistant Presiding Officers

S.No	Name	Danimati	1	<u> </u>
1		Designation	School /Deptt.	Contact No
<u> </u>	Noreen Manan	Sr. PET	GGHSS Murad Pur:	3003574546
<u> </u>	Perveen Akhter	Sr. CT .	GGHSS Murad Pur	
3	Attia Gul	Sr. PST		3450572880
4	Bibi Shaheen		GGCMS FAQIR ABAD TAJAL	
5	Saima Naz	Sr: PST	GGCMS FAQIR ABAD TAJAL	
		SST-Gen	GGCMS FAQIR ABAD TAJAL	
,	Riffat Ara	PSHT	GGPS GULLBAGH	
/ 	Gulnaz	PSHT	GGPS Anyatabad	· · · · · · · · · · · · · · · · · · ·
;	Rani Gui	PST		0345-9628949
into 1	n 0000 of i	F31	GGPS Lammi Battal	0300-7059470

te: 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 Hibi Zabida Markini 1	
2 Sameena Toolka 3155819465	
3 Tahmin Cut 3155819465	
PSHT GGPS MANSEHRA NO.3 3155619465	

TRAINING SCHEDULE

Date

Time

Venue

23-05-2015

8:30 am

Government Higher Secondary School No. 1 Mansehra.

Please ensure your attendance in the gaining.

Muhammad Arshari Knah fanoli W Advocate High Court Office Not 33 Adjacent to

P-30 62 SEHRA. -/2014 ANNE

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

- 1926/AR (110)

Dated 0//10/ /2014

SHOW CAUSE NOTICE.

Bardiniana Sardar, District Education Office: (Feinale) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, do nese of access you MSE Rancoad, PTC GGPS Monjahar Mansehra as Jollows

Foundation Officer E&SE) Mansehra Endst: No. 1170-79 /Apit./PST/F/ dated 20.6.2012, whereas You was stranger for recruitment process untiated through EATA, you never appeared in selection process as a candidates for said post through EATA your name did not fall in the ment list prepared for the selection of candidates. Acceptance of your appear and subsequently your appointment order was the result of misuse of authority by the then CDO according to his sweet well and wisher. Against the recruitment rules as per inquiry report received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)(RSED/A-17/2013 Umai Khan LDO 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:

of any satisfied that you have committed the following acts/omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faxed appointment without due process of reconlinear
- inflected hupe financial losers to the Gove 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 their EDO.
 - As a result thereof, Las competent authority, have tentatively decided to impose upon you the major plenty 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 unposed upon you and also intimate whether you desire to be heard in person.
 - 3. 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.

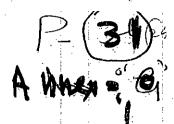
4. A copy of relative page of the linding of the acquiry committee is enclosed

Mst. Rani Gul, PST GGPS Monjahni. Attestal

COMPETENT AUTHORITY

District Education Officer

Mynanmad Arshad Khan Gaine Mynanmad Arshad Khan Court Advocate High Court Office No. 33 Adjacent



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

	NOTIFICATION	. ;
I	where as Mst Rani Gul to Dildar Tanole working as 1 st college Gun Monjani was served with show cause notice and was proceeded	:
	under the Khyber Pukhtunkliwa Govt. Servants (Englency and Disciplinary) Revised Rules 2011 for	
	the charges mentioned in her Show-Cause Notice	1
		:
1	And where as the inquiry committee comprising toe following officers conducted an inquiry regarding the illegal appointments in the office of Expectative 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 Haribur.	. :
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	
1		:
(,	and where as District Education Officer (Female) in the capacity of competent Authority, after ing 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 Mist Ranc Gud DIO DILdar Tan ETTHETETT DST: GGHS/GGM GGPS Manjanc	oli
	0gn3/06M 06M3_7/2M/2M2	
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	ANN THE PROPERTY OF THE PARTY O	
	ODES RICT EDUCATION OFFICER	
Unds	a: No. 1946 - 55 [AE /Estab: dated	
1 Se	cretary Elementary and Secondary Education Department Khyter Pakhtunkhawa, Peshawar.	
	rector Elementary and Secondary Education Knyber Pail's tonkhawa, Peshawar strict Accounts Officer Mansehra.	
	strict Monitoring Officer Mansehra.	
	epu Commissioner Mansehra	
	nncipal/Headmistress DEO(F) Mansehra	
	idget and Accounts Officer Local Office.	
9. M:		
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O STRICT COLCATION OFFICER

Multanine Arshad Khan Panoli
Advocate High Court
Office No. 33 Adjacentile

Hid Directôr, chementary Secondar 14 adion, e or one cakin unkhaw perdia zan

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION STUEL UNDER ENDORSEMENT HO. DATED 3RD MARCH 2015 A CALIFER ANTAGRAPHIA, CALIFORNIA AL FROM GOVERNMENT SERVICE THAT IMPOSED OFFICE itif APPELLANT CAPRICIOUS/WHIMSICAL MANNER WITHOUT LAWFUL AUTHORITY COPY OF THE IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS MARKET "A".

. De termen habensman erren kanker may berase be set aside from THE PART OF HIS ISSUEDGE OF CLARING THE SAME SZETHOUT ENWEGE WEST CONTRADICTION TO THE RECRUITMENT POLICY & RULES THE SAME SHOWN THE SAME WACK BENTERTS AT THE SAME

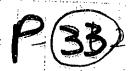
and has offen to the following facts in Selection of the select contact don to colorful car that of power on the part of authority i.e DFO

that the then Executive thatics Officer ESSE Mansehra invited The second street of the second of the entropy satisfaction and ros in District Continue to the property of the second can be said here is, dail, MASHRAQ.

that as peligrocecione and many applied real the post of PST being a smalified teacher having the Min and ETA Test was conducted. an energy but and are some operations a condidate under Rain of the ring minimizer of the conference of their

Har the throught conductor increases and scratinized the documents The Enterdates, one of the standard to was displayed to a manyone expections. Act as see afficial modess the meeting of DSC way

> Advocate High Court Office No. 33 Adjacent to



indicand approved the cases of PST condidates for appointment against wasten posits 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 is instituted from GGPS Monjhani to GGPS Hari Nakka and then GGPS tami Battal.

inal appellant continuously performing her duty without any break to be fast 02 year 08 Words will she received a show cause notice whereby allegations were leveled against othe appellant based on sucception passeless & conceptiment of facts: (Copy attached)

that i comprehensive repay was admitted in response of the show ward note: where is appointed continuation that she was appointed after the recruitment process and her appointment order along with others candidates was issued in a lot after the approval of a DSC.

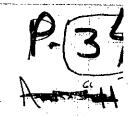
that appellant received impugned order dated 3th March 2015, whereas a the major panalty of dismissal from service has been imposed upon the appellant.

The appointment pages as well provided a long qualification by PTC, CT, to have About the good mass a marthal express and contilicates were also not verified from the conceaned University / Board / Institutions by the Ostrict Officer (Female) Copy attached.

One one adjullant was acceptionary and applications to the District Officer, she submitted here appeal to the Honourable High Court Abbottabad for release of her salary.

the richard, the High costs space appellant officer to the District Officer (1974), for release of the subject appellant with the remarks that the appellant is regular Government Servant in Education Department and the balary to released. Vide of Paro 592-A/2013 (Copy attacked)

Mutanimed Arshall Advocate High Count Advocate High Count Office No. 33 Adjacent Lo



Appellant was appointed after due process of recruitment through ETA test and pocintment order was issued after the approval of DSC on appeal. submitted by the appellant to the EDO. The appellant served as regular teacher and the ition Department for the last 2 years and 08 months and no action was and show-cause was writed neither asked for any fregularities or ner smal hearing during the Probation period.

e) No inquiry was conducted or initiated, no opportunity of defense was offered, ne respond hearing was made, how the authority was passed in the light of Learn ales under what charges/ evidence imposed such a harsh punishment. the inquiry regarding illegal appointment was made against the then EDO not n.6 to the candidates/teachers (The linding of the enquiry is attached) the company was made and in the finding no reconsigendation was issue for the termination of teachers, they only recommended the appointing authority for deep punishment as one step down or 2 increments deduction.

saint laucation Officer and chanfeaut all the teachers from service after का प्रकार, whiद्दी is absolutely against the human rights and against the justika.

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

Ram Gul PST D/O Dildar

Mohallah Near Braff Khana, Pakhwal Road

PO . Mansehra District Malisehra

CNIC No.13503-3860739-0

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In the matt

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

In the matter of Appeal No. <u>746</u>/2015

Amney _ L.
P - 36

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RANIGUL....

Versus

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 interalia 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.

Advocate High Court
Advocate High Court
Office Not 33 Adjacent to

- 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.

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 Honougable Libural.

Dated: /11/2015

Deponent

S Affected

Advocate High Court

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Mst Rani Gul pt. Govt de : vije	
Appellant is	
	,
Service Appeal	-
باعث تحريراً نك	
مقدمه مندرجه میں اپنی طرف سے واسطے پیروی وجواب دہی کل کاروائی متعلقہ آل مقام	i.
Muhammad Arshad Khan Tanoli Advocate High Court	
Office No: 33 Adjacent to کووکیل مقرر کر کے اقر ارکرتا ہوں کہ صاحب موصوف کومقار شدگی کال کا آوانی کا کال اختیار ہوگا نیز وکیل صاحب	
موصوف کوکرنے راضی نامہ وتقرر ثالث و فیصلہ برحلف وویہے اقبال دغوی اور بصورت دیگر ڈ گری کرانے اجراء	
وصولی چیک روپیه وعرضی دعویٰ کی تصدیق اوراس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ پرکور	
کی کل یاکسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کواپنے ہمراہ اپنی بجائے تقرر کا اختیار	
جھی ہوگااورصا حب مقررشدہ کوبھی دہی اور ویسے ہی اختیارات ہوں گےاوراس کاسا ختہ پرداختہ مجھ کومنظور وقبول میں میں	6
ہوگا۔ دوران مقدمہ جوخرج و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔	
نیز بقایارقم وصول کرنے کا بھی اختیار ہوگا۔اگر کوئی پیشی مقام دورہ پر ہویا حدسے باہر ہوتو وکیل صاحب موصوف	
پابند ہوں گے کہ بیروی مقدمہ مذکورہ کریں اورا گرمخنارمقرر کردہ میں کوئی جز وبقایا ہوتو وکیل صاحب موصوف	
مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ فلٹسی کے دائر کرنے اور اس کی	70
پیروی کا بھی صاحب موصوف کواختیار ہوگا۔	
لہذاو کالت نامہ تحریر کردیا تا کہ سندر ہے۔	Jan
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وقاص فولوسٹیٹ کیبری (ایٹ آباد)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

	Amended Appear No	/2016
Mst. Rani Gul, PST, Tehsil & Distr	rict, 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	2527	"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-	۰.٠L;٠
11.	Copy of departmental appeal and receipt	32-35	ردر]،،
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	34	٠,

Through /2016 Dated:

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

> > Advocate High Court Office No. 33 Adjacent to

Muhammad Arshad Khan Tanoli 📝

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, 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, 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 Monihani 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 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 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").
- 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").

3. 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").

GROUNDS;-

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.
- 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.
- That no proper procedure has been h. 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 appealby the competent authority theappointment 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 03/03/215 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.

Rani Grul ...APPELLANT

Through

Dated:

/2016

(Mulyanan Arshad Khan Tanoli)

Advocate High Court

Advocate High Court
Office No. 33 Adjacent to
Distr 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	l 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

<u>AFFIDAVIT</u>

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 Arether Wellish Faviori (Muhammad Arether Wellish Faviori Advocate High Court, Applituded



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Board of Intermediate & Secondary Education ABBOTTABAD

DETAILED MARKS CERTIFICATE Secondary School Certificate Examination (GENERAL GROUP)

Session 200 O (Annual/Supplementary)

Father's Name D. 2 day

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2. Urdu 150 10/3	
	الماسين وسيد
1/ 6/6/1/19 1///// // // // // // // // // // // //	
3. Islamiyat Comp.	V. angd
4. Pakistan Studies 11 75 48 Five h BISE dred	بن استنسسید.
5. Gen. Matheplatids 100 100	
6. General Science 1100 103 Twenty Eight.	
7. Art 855 855 500 57	
Total 850 528 B	

This Certificate is issued errors and omission excepted.

Checked by:

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Board of Intermediate & Secondary Education Abbottabad

Attesled

Advocate High Court

Office No 33 Adjacent to

TE & SECONDARY EDUCATI





Group:

Sr. No. Z1.7.90.5....

RD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD DETAILED MARKS CERTIFICATE

Higher Secondary School Certificate Examination Part-II

Name: **PANI GUL** Father's Name . DILDAR

HUMANITIES

Roll No:

						34/3 €
Subjects	Marks	Part-l Theory Prac	Par	1-11	leto)	btained
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Checked By:

Date: 31-January, 2004

· Controller 61 Controller of Examinations

Board of Intermediate a Secondary Education

Abbottabad

Note: Errors / Omissions excepted

Advocate High Court Office Not 33 Adjacent to

SNo: 3772

DETAILED MARKS CERTIFICATE



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: Manschra

Course Name	Marinum	Secon	id The
I. Part 1 Marks	285	larks Obtained Marks In Words	Remarks 12
2. English Compulsory		145 One Hundred & Forty-Five	Pass
3. Pakistan Studies	40	25 Twenty-Five 18 Eighteen	Pass Pass
4. Urdu	75	44 Fony-Four	Pass
5. Islamle Studies	75	44 Forly-Four	Pass
	Total 550 Percentage 50.10 at	276 15 95 A	10

Division

Prepared by:

Thecked by:

Controller of Examination Hazera University Managina

Controller Examinations Hazara University, Mansehra

December 25, 2005

Advocate High Court

Office No. 33 Adjacent to

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Note: — Предержания не в орцика. Capition Studies Inc.

ZARA UNIVERSITY

SNo: 1832

MANSEHRA, NWFP, PAKISTAN DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL)

ANNUAL EXAMINATION 2010

Roll No: Name:

31528

Rani Gul

Institution/ District

MANSEHRA

04-P-870 Reg No:

F/ Name: Dildar Tanoli

Subject: Urdu 5 page 214/57

						· / ·	
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Qusceda, Masuavi & Marsia	106		. 60		60 ~	SIXTY	Pass
lqbaliat	100		48		48	FORTY-EIGHT	Pass
Criticism .	. 100		52 .		52 ^L	FIFTY-TWO	Pass
Essay	100		45		45 L	FORTY-FIVE	Pass
General Viva Voce	100		46		46	FORTY-SIX	Pass
Total:	1100 48.36	L			532	FIVE HUNDRED . THIRTY-TWO	

Percentage:

48.36

Division:

SECOND

Print Oate: 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.

Controller Examinations Hazara University, Mansehra

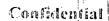
January 04, 2011

Controller of Examination

Hazara University Mansch

Attested

Muhammad Krshad Khandankii Advocate High Court Office No. 33 Adjacent to



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD DEPARTMENT OF EXAMINATIONS

(Verification Section)

No. F. 1-5/Verr/ 30056

DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

Dated: 06 Oct, 2013

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

Dear Sir/Madam,

dated 12 Sep, 13 This is with reference to Letter No. 7193 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/Degre Diploma/Transcrip PRC No.
1	RANI GUL DIL DAR TANOLI	PTC	04-NMA-0058	141745
2 .	RANI GUL	B.ED	04-NMA-0058	413497

Salstant Controller of Examinations Conditions Section
Alian's Ighal Open University isiamabad.

ffice No 33 Adjacent to

Scrial No. 141745

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD PROVISIONAL RESULT CARD

RANI GUL

Name DIL DAR TANOLI Fathers's NameLDAR TANOLI P/O KHAKI

NEAR BY BOMBBY MOSQUE MANSEHRA

Tehsil MANSEHRA District

has successfully completed

Roll No. Registration No. Final Semester

Ü625053 04NMA0058

AUT- 2006

PRIMARY TEACHI

	Janvossiality (combicied	PRIMARY TEACHING CERTIFICATE		
.,	The detail of pass		are as under:		1
7.5	Semester	Course	Title of Course	M	arks
* معیداد	SPR- 06	0613		Maximum	Obtained
(_{apr})	SPR- 06	0614	PRINCIPLES OF EDUCATION EDUCATIONAL PSYCHOLOGY	100	68
	SPR- 06	0615_	SCHOOL ORGANIZATION & MANAGEMENT	100	76
E-Marie	SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	52
Care Control	AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	78
441	AUT- 06	0617	TEACHING OF URDU	100	:80
i net	AUT- 06	0618	TEACHING OF MATHEMATICS	100	:63
* 2	AUT- 06	0619	TEACHING OF SCIENCE PHYSICAL EDUUCATION	100	61
	AUT- 06	0620.	TEACHING OF ISLANTANTA COCING STUDIOS	100	GE
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-			Muhanmad Arshad Khan Tanoli Advocate High Court		
0	•		Office No. 33 Adjacent		
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CREDITS:

Result Declared on SEPTEMBER 20, 2007

SEPTEMBER 25,2007 Date of issue

Total Marks / Obtained

900

628

Percentage / Grade

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 original record of the university student.

Controller of Examinations 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

AMA IQBAL OPEN UNI STTY, ISLAMABAD PROVISIONAL RESULT CARD

RANI GUL Name

Serial No.

Tchsil

District

Name
DIL DAR TANDLI
Father's Name DIL DAR TANDLI
Address MUSTAFA TRADERS FARHANA RD KHAKI DILDAR Address TANOLI P/O KHAKI NEAR BY DOMEBY MOSQUE

MANSEHRA

has successfully completed

BACHELOR OF EDUCATION(B. ED)

he detail of pa	ssed course	s is as under:		
Semester	Course Code	Code Title of Course		arks ;
SPR- 11	0513	SCHOOL DREAMIZATION	Maximum	Obtained
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	98
3PR- 11	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	64
SPR- 11	0651	ENGLISH (COMPULSORY	100	69
AUT 11	0517		100	61
AUT- il	0658	TEACHING OF URDU	100	56
SPR- 12	0512	PERSPECTIVES OF EDUCATION	100	67
SPR- 12	0452	ISLAM, PAKISTAN AND MODERN WORLD	100	52:
3PR- 12	0655		100	71
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CREDITS:

Total Marks / Obtained

576

Advocate High Court Office No: 33 Adjacent

Result Declared on JANUARY 04, 2013

Percentage / Grade

AJ662484

Registration No. 04NMA0058 Final Semester SFR-2012

цор

Roll No.

Date of issue

JANUARY 18,2013

Disclaimer:

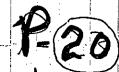
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This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued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



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD RESULT INTIMATION CARD

Serial Mo.

Registration No.

Roll No.

Cartified that Mr/Ms.

RANI GUD

Failier's Name

DIL DAR TANOLI

has Successfully Completed the

CERTIFICATE OF TEACHING

programme. The detail of course is as under

A STATE OF THE STA	Code Title of the Course	Ma	rks
	Code Title of the Course	Maximum	Obtained
DR-04 G	531 DIMENSIONS IN EDUCATION	100	65
PR-04 00	532 EDUCATIONAL PSYCHOLOGY	100	58
PR-04 00	533 SCHOOL ORGANIZATION	100	57
PR-01 04	US PRACHING STRATEGIES & EVALUATION	100	79
UT-04 06	504 PRDU LANGUAGE AND ITS TEACHING	100	74
UT-04 DE	505 SOCIAL STUDIES & ITS TEACHING	100	ສດ
U%-04 Q6	FRACTICAL WORKSHOP & TEACHING FRACTICE	100	74
DEF-DA DE	34 ENGLISH AND ITS TEACHING	100	54
UI-04 86	35 ISLAMIAT AND ITS TEACHING	100	64 !
Jani Jama		hammad Arshad Advocate Hig Office No. 33 A	Khan Janoli

Total Credit Hours

: :

Total Marks Obtained

Total AIOU Credits

Percentage Marks

Result declared on

Date of Issue:

Movember 21, 2005 Dacember C. 2005

CGPA

Confroher 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.

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(جزل)

ررب (ین میران ارد رن کردند) میشتر (نارتد) می ایند ایلان با دارست با دوسته میشن أبر ا Guardayysney و دونون ۲۲ خوان در الديد عند دون دون 45 AUP 170.102(20)6-11)077 (47)777 (47) يكيا اكارسال كود بمدور فيروك بلدر مذال البتك عودك وكاب سدود ولا الكيا نیزول رئیس 2009 کی نیاد مبریم تنذر^{مال}اس مبردبر برزاوان بذكنر بخرافرم مرى كواليفائيز كنتر يمرانرم المجالش يتركدا وزعن المهالير مبزل خالنا البزيمين ا یم الحی ما بری ادر دکستر تمنی مراتخ بر: الموالي نام ميب ايز كن مرازي بالبينه ايم ايس اسامل نسنرتهن مني ويجاش تنارزيان برائير بمثالينه المحاش اخروروه أشك بتنال زركنان المانين البرئنسركز أ فرموں رک کور طریق الیان ما الرك ك في كور در ترك اخرات ال كو كور الدان ك نابت وربائة في الم كامت كل الميت فروا شوراً كروى جائة كى الدوان كراوم والأسك من ووايك است كرف ك المن المراز الماسات ك هيل باد انزر كوك كالامن زومزنت بمسر مزيزة كت م م کاتشیل مناصيرة في أي 2-6-2011 di 410 1301000 106.20 <u>ان</u>ن (لأنورامندادرمنيز ولما تزينوا أ أسرلها ، 12-ماره الزك والدارا كروال ABP 110,102-2010-11

Pre Bid Meeting

زير وَكُنْ كَ وَالْمُ عَلَى مورى 2011-5-13 كريات 11:00 يك الك سينك سنتر بوك عمل شريان ومندكان يدكم كحمال تراء وخراما م إن دول اوران كركام يدال والرابيان والمان 100 دا بات کادواس بران کے ماتو شیل سے بات بیت او کا اکسٹ کروائل در بات اس کے شام مزرديد إلا المكل الميت كما المراز ول مع يستك الما تركمت مظارب ب-

31-05-2011 كاندويرة كالروتر كالوقات كارش في بال خراء كاي تن عن عراد صدر وأن سدة د ما دیرات شکک درید یا تکن ادرای دن bid ما آن که کن د کک د

 (1) كمين لواقزة شافق كارة كي كان ۱۱) كليره واصلات المين دائد ادر لجوالي ال كم ملارية ومنز في بمسايسة كارس. (اللهامي كالباية) والماس مرتكيد الله المنيدل وكان عدائ كالركال الله المرادي كالركال الله المرادي () نیزر کر ال ک در فار کم فی نیز رفارم بار کا نیزی کیا جائے کا خیز رفادم نیز رکم اللے ک درفات اید دن تل مامل كرا شرودي سبر : وكشركي دار زات خرد يافرم كاسد قد بارتزيين كا نباز وكا

 نے ذرعام ڈراکی در افزام کی افزام اور کی این کا افزام کے تام (00) مدر افزام کے افزام کے افزام کی افزام کی افزام کے افزام کی ا مَنْ كَمُنْ كَالِولُ مِنْ مَا

4) انع كذروف Subballing كامونت عى يُنذرك في الإيلادية والت عبد كارا ألَّ ن) لِمَاكَ بِرِيُر 10 سِيرَ إِن Malawa وعند سين السلاككية الناوائي لي كشرة النوب الأون وارت والدي

الله المارك المارك والمارك كورل الله المارك الم ا زر بیر کی فراس کے دفتر بنا کروائم کریں کے داکر جہاں میں کے گید شکردہ Hale Analysis تن ر منترف إنه كيدار ك رين ك في Supportive عبت منه يرك أو لادبند ما زوانات كرام كارتبا ك ما كن ادرنست باكد لسن كما مانية .

۵) نیکسرل کا کو آن مرببه تا لون ک تحت اوک ..

7) نیز رسیدت نیکی دادان کی ای بخت محتونت ویک وادر با بخانا مید کی شودت ش زیز رک ل با بازاد

0) كام كل كرف ي تيادكود ورك إلى كم ما إن كيام إينا و من كما عناف وواليام ووالمات كم المعمَّى إلى

ن) الرحمي إلى مديناً وارئ م اليندوت تعرف مع منط أوا في المراحل الدما أم أوز ودويه إلا ووراد الدرايران ناميكون يرشروه اوقات كامين وستنده

10) مشيرك در شغر ل مجيد دار فرومها كرے كاور ف ميشو يل سكانست يجيد دارك و مدادك و دك-

11) کے ارمی فرام میں کافینڈر کے میں PEC Registration میں کی آبری 2011-12-21 کاست على ورزي كرانا زل م

ارت: با آخرا تنارخ بادی کی کی دخزی دنارند کاری و کسی باک بی س

الكزيميوانج بنتر

ى الْيُؤْرُدُ بِلِيْرُوْ وَرُجُ لَى مِرْدَالِي فِن 570861 - 57090

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لا اے ال ایس کا سادل ذکری کسی ک ورسال ا 11 اين $\omega :$ ت او کرمهادی تالیت FIR 44 :1 6-7-مرن ادرشادة الماسيكى كالتليم شعه 111; وينا ६ि 2-7-11 المن والمناهدة عدر الإحداث th: ٠٠٠ 11-7-Ji-3 11 1113 (51 ئەزك (مىكندا، برن) كى بىلىلىم شدە يورز 1-1-7 ے ہم میں استریکتیم وہاق الدواری ہے شہارا 11 معنائید آیا آخرم آمرید دادا دمنا سید یا مرفرانش میکندنده می اسرزگری کمی مشعرم نیرونی :18 Ĺч .6:1 12-7-و وا كرود ا كا كرون الرائد الدارك الدارك المراكد المرا مروى الزعن اب تح كادما لمت ب ورواست دين كابنوى من كي الشينة كل مدرد أل يود كام يسيمين وأني كرانا ولات بخر الدكور

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خدنال

مى فرناش كى ايمام دى شن ركادت شار ـ (4) الى البيداندن كى اشدك كالبروت عما كى كوك Are نے وال ورخواستوں مر فور کیا بائے کا روا) آسائ ورا کی تعماد شرا کی ویشی اوسان

رأة وكالمراحة والمعالمة والمرادة والمرا بازگار 2011 م 24-04 کوشت براه کا تا نسبت پس کم بینگر (۱) اگل لام سادات کی مورد بری دارند تروز رخ الراري بالماري بالماري الماري الماري

Advocate High Court Office 12 33 Adjacent 13

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73	IAI-1 FEIVIAL	E MANSEHRA RESULT 2		Main-X
II N ()	Name	Father Name	Marks	%age
	ZARIA BIBI	M FARIQ	48	Fail Fail
03104	SUMERA-KHURSHID	M ANWER SHAH	56	Fail
03105	FARHAT •	ABDUL KHALIQ	72	Fail
03106	BIBI GULSHAN	AURENGZEB	24	Fail
03107	NABEELA BASHEER	ABDUL HAMID	88	Fail
80,170	BIBLGUL K•NO	M M TARIQ	84	Fail
03109	SARHNARIBI 13/10	KHALID ROSHAN	72	Fail
03119	RANI GUL	ABDUL SATAR SHAH	176	58.67
0311	AMINA BIB	M ISMAIL	92	Fail Fail
	BUSHRA RASHID	GULZAR HUSSAIN SHAH	104	Fail
	BUSHRA JAVAID	DILDAR	112	Fail
	MEHWISH		108	Fail
	ALMAS		156	52.00
	Mariam Bibi		132	44.00
	Nosheen :	SORGE ELECTION	64	Fail
03117.1			48	- Fail -
03113		18/1	80	Fail
03119			108	Fail
		1 10/1	108	Fail
703121			136	> 45.33
	Fozia Bibit		108	Fail
	SAIQABIBI		164	54.67
	FARHATNAZ		124	41.33
	LUBNAASHRAF		112	Fail
	ANEESA	·		Fail
	TAHIRAPARVEEN		124	41.33
	ZAHIDABIBI		124	Fail
	AZEEM		76	
03130			188	62.67
	SANIASARW		112	Fail
703132	SAHIBZADIAZMATRABBAN		128	42.67
703133	?Ŷ?N?		68	Fail
703134			128	42.67
	KOUSAR	<u> </u>	116	Fail
	SADIAKANWAL		96	Fail
	SAMEENAFARMAN .	Attored	128	42.67
	АЗМАНАМЕЕD	MYO 1	80	Fail
	SAIQARAFIQ 1	1 4 3	104	· Fail
	MAJIDABIBI		. 88	Fail
	MAZLOOMA	IIII A HID	124	41.33
	SHABNAM	Muhatimad Arshad Khan Tanoli Advocate High Court	112	Fail
	PIBIANIQARANI	Muhammad Arshad Khan tun Advocate High Court	60	Fail
	SHAHNAZ	Mulial Arshau Court Advocate High Court Advocate High Court	44	Fail
	SH?SHADBEGUM	Advocate The Adjaceth	52	Fail
	FOZIABIBI	Die!!	116	Fail
	SEHRASH		92	, Fail
	NABEE?		80	. Fail
	FA?ZA		100	Fail
	RUBANAGUL		136	45.33
			76	Fail
	TAHIRABIBI		116	Fail
	SA?I?HALEEMA		128	42.67
	SAMINAREHMAN			_
	BIBIMARYAQAZI	<u> </u>	116	Fail
	NAHEEDABIBI		68	Fail
	NAZIABIBI	<u> </u>	64	Fail
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ONDER.

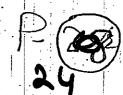
As approved by the Departmental adjection Committee and on the verification of the documents from the concerned authorities, the Competent Authority has been pleased to appoint the Miss: Rani Gul D/O Dildar Tanoli R/O Mansehra as PST against vacant posts at GGPS Monthant in 198-7 @ Rs. 5800-520-15400 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the dase 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. Fie/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 .
- 4. The release of the pay by the concerned DDOs will be subject to the receipt of verified decrements by the appointing authority / (12)O B&CC (dansehra)
- 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.

> Arshad Kwan Advocate High Court Office No: 33 Adjacent (5



- His/lier 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 BED False
- 10. He/she should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
- 11. He/she may not be banded over the charge if his/her age is above 35 years and below 18 years.
- 12. The Candidates who are working as regular before 1st July 2001 in pervious post, his/her
- 13. No. TA/DA etc is allowed.
- 14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi) EXECUTIVE DISTRICT OFFICER

Endst: No. 1120-21/Estt: Apptt:PST//2011-12 Dated Mansehra the 20/6 2012 E&S EDU: MANSEHRA Affected

Secretary to Govt: of KPK E&SE Department Peshawar.

Director E&SE Department KPK Peshawar. 3. District Accounts Officer, Manschra.

4.-5 District Officer (M&F) Local Office. 6-7

Deputy District Officer (Female&Male) E&SE Manschra. 8.

PA to District Coordination Officer, Manschra. 9

Budget & Accounts Officer, local office, Manschra.

10. Candidates concerned.

Advocate High Court Office No. 133 Adjacent Jiet Gar Ahha

EXECUTIVE DISTRICT OFFICER E&S EDU: MANSEHRA

order issued by then EDO unar Khan Kind CM No. 434A in WP No. 592-A highcourt directed That by periotioner hence is varitieed for pay

Manshra

Pers #: 00712174 Buckle:

Name: RANI GUL

Dsg.: PRIMARY SCHOOL TEACHER

CNIC No.1350368607390 GPF Interest Applied

Vocational Temporary 12

PAYS AND ALLOWANCES:

5002-Adjustment House Rent 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:

4200-Professional Tax

P Sec:001 Month:April 2015

MA7044 -Dy D O (F) Pry Edu Mansehr

Min: Education Schools

NTN: GPF #:

Old #:

MA7044

1,306.00

1,200.00

1,200.00 2,177.00

653:00

1,600.00

800:00

8,000.00

16,936.00

Subrc:

100.00

Total Deductions

02 Years 10 Months 006 Days

100.00

16,836.00

D.O.B 24.06.1984

LFP Quota:

HABIB BANK LIMITED SHINKIARI ROAD, MANS

7900259303

Advocate High Court Office Not 33 Adjacent to

Manshra

Buckle:

S#: 1

Pers #: 00712174 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 Pro-

Pry Edu Mansehr Min:

Education Schools NTN:

GPF #:

Old #:

MA7044

1,306.00 2,856.00

1,200.00

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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

7900259303

SHINKIARI ROAD, MANS

Advocate High Count

Election duty 2013

OFFICE OF THE RETURNING OFFICER

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Nor	127-

Date 7/ 1/2013

OFFICE MEMORANDUM

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

vos Folling Station 301 Government Girls Middle School Chinar Kot (Combined) for election to the National Constituency No: NA-20-Manschra-I, PK-56, Manschra-IV,

To be held on the 11th May 2013.

To be held on the 1	1 th May 2013.	Same & designation of	Name of assistant	: : :
Name & designation of presiding officer	Name & designation of Assistant presiding officer	polling officer	presiding officer, designmed as presiding officer	
Doctor Muham, and Shoaib SMO ETIC Chatter Plain 0300564303.	I.Taj Malook CT Chatter Plain 03335051827 2.Rasheed Ahmad TT GHS Jehrian 03335025394 3.Mati-ur-Rehman TT GHSS Battal 0345597057 4.Ghafran Shah Qark GHSS Battal 03025256252 5.Zahida CT GGMS Banda Gesuch 03479843883	Aurangzeb PST GPS Dehri Halcem (3338062487 2.Muhammad Haroon PST GPS Dheri Halcem (03279227189 3.Rani GULPST GGPS Land 97458365857 2.Surya PST GCP Kot 73.uri Sor 153	Faj Alalook CT Chatter Plain	
	6.Salma DM GGMS Banda Gesuch 03125753884 7.Netofar PST GGPS Kot 03439557797 8.Gulshan PST GGPS Single Kot ~ 03348351299		Attesto Advocate Advo	High Court 1: Adjacent 1:

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.

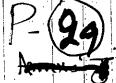
Fraining: 27.04.2013 (For Males Pr.Off and APChroniy).

Formula: 25.54.2013 (Fer P., Olff and APO)3

Fe nale Poiling Officer: 05.05.2013. Poling Officers (Male): 04.05.2013, Venue: Government Commerce College & Hanagement Sciences, Mansehra.

Returning officer PK-56 Manschra-IV Returning Officer NA-20 Manschra-L

Election Dut 2015





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

٢			Y 		F 1	
	S.No	Name	Designation	School/Deptt.		Contact No
	1	Nazia Abbasi	SS	GHSS Phuira	11	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	1 1
4	Bibi Shaheen	Sr. PST	GGCMS FAQIR ABAD TAJAL	1, 1
5	Saima Naz	SST-Gen	GGCMS FAQIR ABAD TAJAL	
6	Riffat Ara	PSHT	GGPS GULI BAGH	
7	Gulnaz	PSHT	GGPS Anyatabad	0345-9628949
S	Rani Gul	PST	GGPS Lammi Battal	0300-7059470

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

Palling Officers

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

TRAINING SCHEDULE

<u>Date</u>

Time

Venue

23-05-2015

8:30 am

Government Higher Secondary School No. 1 Mansehra.

Please ensure your attendance in the fraining.

e High Court

SHOW CAUSE NOTICE.

Maghmana Sardar, District Tiducation Offices (Lemale) Mansehra at Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, do ness by least you Mst. Ram only PTC GGPS. Monjaight Manschralas. follows.

You were allegally appointed as PTC at GCPS Wonpilin, 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 to said post triough EATA, your name did not fall, in the ment 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 well and wisher against the recruding it rules , as per impury report. received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(\$7M)L&SED/4 17/2013 Umar Khan LDO BS 19 dated 25.8.2014.More over the then EDO (E&SL) removed from. Government Service in connection with all such bogus appointment ancluding you made by bim

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; - .

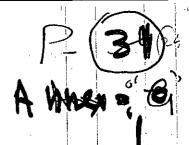
Lam satisfied that you have committed the following acts/omissions specified in rules

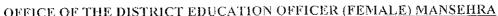
- a) Misconduct and dishonesty in getting bogus/faked appointment without due? process of securioreac
- inflected. Impelfinancial losses to the Govt: Treasury receiving pay and result of bogus арреавинені
- By snatching established rights of the deserving candidates due for appointment on merit. Cheating / cancelling the facts for unlawful appointment with collusion of the $\mathring{\vec{n}}$ EDO.
 - L. As a result thereof, Las competent authority, have tentatively decided to impose upon you the major plenty of dismissal from services underscule 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.
 - 3. 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 ek parte action shall be taken against you.
 - A copy of relative page of the finding of the inquity committee is enclosed

Mst. Rani Gul GGPS Monjahni

Education Officer Female) Mansehra

ligh Court Office No. 33 Adjacent





	OFFICE OF THE DISTRICT EDUCATION OF FICER (FESTALE) MANGEMAN
	NOTIFICATION
l -	Where as Mst. Roni Gud. Dio Dildar Lonole. working as 15, Gotto/GoMs/GGP/lonjane 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 (NowSecretary Zakat, Usher and Social Welfare Department)
	ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Hampur.
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 being considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Sl.ow Cause Motices, 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. Ranc Gul DIO Dildar Tanolic GT/PET/TT DST GGHS/GGM GGPS Manjanc
	()DISTRICT EDUCATION OFFICER
	TELEVACE MANUSARHRA
End	st: No. 1946-15 [AE /Estab: dated (3/03/201)
, ,	Copy to the:
	ecretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
	District Accounts Officer Mansehra.
	istrict Monitoring Officer Mansehra.
	Deput / Commissioner Mansehra. Principal/Headmistress
	DEO(F) Mansehra.
	Budget and Accounts Officer Local Office.
	Vist:
JU.	Office File.

DISTRICT EDUCATION OFFICER

Mulantia da Arshad Ahan Taholi Advocate High Court

-(35)

Annex- J

flur Director.

Phononthry a Secondary Education, any organization mkhaw Preincean

AND GONED UMPUGNED ROTHERCATION MAY DEEDSE BE SET ASIDE PROMITS DATE OF HIS ISSUABLE DECLARING THE SAME WITHOUT LAWFUL OF THORITY CONTRADICTIONS TO THE RECRUITMENT POLICY & RULES OF THE SAME OF THE AUGUST AND MEDICAL BOACK BENTOTS AT THE SAME TO THESE.

SHEATON TO

The same fit of the location personal and the time following facts in connection to colorful executes of newer on the part of authority i.e DEO [7] Manachya.

That the then Executive triadict Officer E&SE Mansehra invited as the contract contribute of process of various codies in District Transfer is complianted to come another in daily MASHRAQ.

that as per procedure applicant applied for the post of PST being a modified tencher having PFC at 1, 6-Life MA and ETA Test was conducted as 267027 to 1, and happetteness appropriate as a conditate under Rule to 35 feature obtained 1 has believed as a conditate under Rule to 35 feature obtained 1 has believed.

That the time EDD conducted increase wand scrutinized the documents of the candidate was displayed for the election objections. Advances of disciplinates the meeting of DSC way.

Muhanimus Arshad Khan tanoi Advocate High Court Office No. 33 Adjacent to hold 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 fast 60 year 68 Months while she received a show cause notice whereby altegations were leveled against the appellant based on Auncoction, baseless & concealment of facts: (Copy attached)

that a comprehensive copy was admitted in response of the shew care active wherear appellant admited 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.

19 at appellant received impugned order dated 3th March 2015, whereas tim major penalty of dismissal from service has been imposed upon the appellant.

the configuration present of parties found qualification i.e., PTC, CT, to any MIA with good marks which begreen and certificates were also got verified from the concerned University / Board / Institutions by the District Officer (Female) Copy attached.

one of the appellant was not pain any alary after her appointment up to some 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 riomons one High Code suboblassed had order to the District Offices to SL for resease of the salary of appellant with the remarks that the appellant is regular Government Servant in Education Department and necessary to released. Vide W.P. (10.592-A/2013 (Copy attached))

Mulamina Arshad High Count Advocate High Count Advocate 33 Adjacent



- Appellant was appointed after due process of recruitment through ETA test and in appeal order was issued after the approval of DSC on appeal submitted by the appellant to the EDO. The appellant served as regular teacher in trincation Department for the last 2 years and 08 months and no action was label our show-cause was served neither asked for any irregularities or necessal hearing during the Probation period.
- the inquiry was conducted or initiated, no opportunity of defense was offered, no measured hearing was made, how the authority was passed in the light of dear rules under what charges/ evidence imposed such a harsh punishment.
- The inquiry regarding illegal appointment was made against the then EDO not ances the candidates/teachers (Tipe linding of the enquiry is attached).
- termination of teachers, they only recommended the appointing authority for the punishment at one step down or 2 increments deduction.
 - one 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 above dismissal order /notingation that is without lawful authority and hoving no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station.

Advocate High Court

Advocate High Court

Advocate High Court

Office No. 33 Abbottabad

Rani Gul PST D/O Dildar Wohallah Near Braff Khana, Pakhwal Road

PO Mansehra Tehsil & District Mansehra

CNIC No.13503-3860739-0

P-35

LEOPARDS COURIER SERVICES PVT. LTD.	57308	TPdZa
	*	Leopards Courier Pieces
rom: PGMI CALL		Weight
ASH //) DECLARED DATE	2	Price Inclusive of G.S.T. 12-00-9808-001-91
ASH DECLARED DATE Operator Accepted Above Mentioned Items on Shipper's	TIME	SIG.
Shipper's Agreed All the Conditions Printed on Reverse & & Shipper's المستعمل المست	Now Send Gris 7	omplaints Confact info@leopardscourier.com o Your Loved One's By Leopards Loveline www.ecpardcourier.com

My State High Count

Advocate High Jacent

Office No. 33 Adjacent

Charge Dio/28

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

In the matter of Appeal No. <u>746</u> /2015

RANI GUL.....

.. (Applicant)

Versus

Govt of Khyber Pakhtunkhwa through 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. Alester

> Advocate High Court Office Not 33 Adjacent to

- 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.

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 Taburat

AHK

Dated: ____/11/2015

Deponent

12.5

Affested

My Advocate High Court
Advocate High Court
Sifice No. 33 Adjacent

Service Torbunal lette Peshawar - 1/10!
MSt Rani Cul pi. Gort ete : vije
Appellant :ijin
Service Appeal jean jean jean jean jean jean jean jean
باعث تحريراً نكه
مقدمه مندرجه میں اپنی طرف سے واسطے پیروی وجواب دہی کل کاروائی متعلقہ آں مقام
Muhammad Arshad Khan Tanoli Advocate High Court
Office No: 33 Adjacent to کووکیل منظررکر کے اقر ارکرتا ہوں کہ صاحب موصوف او مقارمہ کی کل کا کردائی کا کالل اختیار ہوگا نیز وکیل صاحب
موصوف کو کرنے راضی نامہ وتقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء
وصولی چیک رو پیہ وعرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ ندکور
کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختارصاحب قانونی کواپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اورصا حب مقرر شدہ کوبھی وہی اور ویسے ہی اختیارات ہوں گے اوراس کا ساختہ پر داختہ مجھ کومنظور وقبول ہوگا۔ دوران مقدمہ جوخرج و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایار قم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہویا حدے باہر ہوتو وکیل صاحب موصوف یا بند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے یابند نہ ہوں گے۔نیز درخواست بمراداستجارت نالش بصیغہ مفلس کے دائر کرنے اوراس کی پیروی کا بھی صاحب موصوف کواختیار ہوگا۔

لہذاوکالت نام*تح ریکر* دیا تا ک*ەسندر* ہے۔

Deceples

Advocatingh Count 1

Office No 33 Adjacent to

BEFORE THE KPK SERVICE TRIBUNAL,

Mst. Rani GulAppellant

VERSUS

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

SERVICE APPEAL

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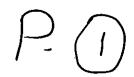
Dated 01.07.2015

Mst. Rani Gul

...Appellant

Through

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



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

VERSUS

Bervice Tribunal

Diary No 766

Pared 6-7-8-15

- 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, MansehraRespondents.

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.

Respectfully Sheweth!

- 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 abovementioned 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 guilt 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.

- That, the services of the appellant were ii. terminated on the fact that 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 of her fundamental light 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.

- 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 guilt 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").

That, in reply to show cause notice ix. 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

P- 9

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

Dated 01.07.2015

Mst. Rani GulAppellant

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.

0 6 JUL 2015 SOON WHAM TO SEE THE SEE

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Mst. Rani GulAppellant

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

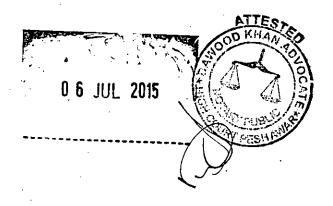
ABDUL SABOOR KHAN, MALIK ASHPAQ AHMED JILANI, Advocates High court, Mansehra.

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 ASHPAQ AHMED JILANI, Advocate High court, Mansehra.



BEFORE THE KPK SERVICE TRIBUNAL, **PESHAWAR**

Mst. Rani GulAppellant

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

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

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA No. 7194/AB(F) Dated Mansehra the 12/9/12013 VERIFICATION OF SSC & FA CERTIFICATE /DMC Kindly find herewith enclosed DMC of SSC & FA in respect of Miss: Rani Gul

Τo

The Controller of Examination, BISE Abbottabad

Subject:-

Memo: 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: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.

EMALE) MANSEHRA

P- (4)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. <u>7195/AB(F)</u>

Dated Mansehra the 12/9/12013

To

The Controller of Examination,
Hazara University Dhodial Mansehra

Subject:-

VERIFICATION OF BA & MA CERTIFICATE /DMCs

Affected Redpor

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.

Incis: BA, MA DMCs &

Bank Draft Bearing No. 000815 (3 Copies)

DISTRICT BOUGATION OFFICER,

(FEMALE) MANSEHRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7/93/A/3(F)
Dated Mansehra the 12/91/2013

To

The Controller of Examination,
Allama Iqbal Open University Islamadad

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:Apptt: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

Affected

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Board of Intermediate & Secondary Education ABBOTTABAD

DETAILED MARKS CERTIFICATE Secondary School Certificate Examination

(GENERAL GROUP) Session 200 D (Annual/Supplementary)

ather's Name D D	dar	Roll No.	-3286
SUBJECT	Marks Allotted in Fig	MARKS OBT	AINED Words
i. English	150 97		A SUICER
3. Islamiyat Comp:	75 /3	Five h8	RECOURSED TO THE RECOURSE OF T
Gen. Mathematics	3 100 4/	Twenty	
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Total	850 528	В	
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Affected asyles



sr. No. **Z1..7.9.0.5.....**

SECONDARY EDUCATION ABBOTTABAD

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

RANI GUL Father's Name : DILDAR Group: HUMANITIES

Session: 2003 Roll No:

			Marks Obtained						
Subjects	Marks	Par		Part-II		Total			
		<u>Theory</u>	Pract	Theory	2rapt		Marks In Words		
English	200	33	 	33	-/	66	Sixty-Six		
Urdu (Comp)	200	48		67	-	115	One Hundred Fifteen 101-17-16-E		
Islamic Education	50	32			,	32	Thirty-Two ord of the control of the		
Pakistan Studies) [EQ	-		17.		17	Seventeen Abbeitabad:		
Civics Our	200	49/	-	51		· 91	Ninety-One		
Islamic Studies	0 7abb	154		60		114	One Hundred Fourteen		
Urdu (Advence)	LCKE!	Y 3	-	56	-	89	Eighty-Nine		
Jrou (Adegrice) HSSC:SECHECY 3 Lotal: 1100						524-0	Five Hundred Twenty-Four Only		
			Ŗe	marks:	Ì	7			

Checked By:

Date: 31-January, 2004

Controller of Examinations

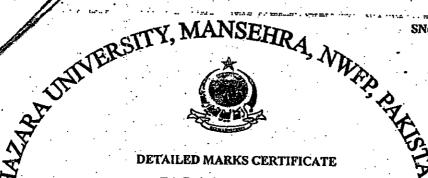
Board of Intermediate a Secondary Education

Abbortabad

Note: Errors / Omissions excepted

Affected

SNo: 3772



BA Supplementary 2005

Roll No:

06617

Registration No: 04-P-870

Student's Name: Rani Gul

Institution/District: Manschra

Father's Name: Dildar Tanoli

Second

= 1036 A 04 = 1036 A 04 = 1036 A 04 = 1036 A 04

		·	
. Course Name		Marks Obtained Marks In-Words	Remarks 12
1. Part 1 Marks	285	One Hundred & Porty-Five	Pasa
2. English Computsory .	75	25 - Twenty-Five	Pass
3. Pakistan Studies	40	18 / Eighteen	Pale
4. Urdu	75	44 Forty-Four	Pass
5. Islamic Studies	75	44 Forty-Four	Pays
	Total 550	200000	

Percentage

50.18 %

Division

Second

Prepared by:

I hecked by:

Controller of Examination Hazara University Macsalu

Controller Examinations Hazara University, Mansehra

December 25, 2005

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Note: Discrepances or a

HAZARA UNIVERSITY

SNo: 1832

P_(19)

MANSEHRA, NWFP, PAKISTAN

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL)
ANNUAL EXAMINATION 2010

Roll No: 31528

Name: Rani Gul

Institution/ MANSEHRA

District

Max: Marks Marks Obt: Total Marks in Words

TH PR TH PR

MA Previous Marks

Subject: Urdu

Marks in Words

Remarks

Reg No: 04-P-870

F/ Name: Dildar Tanoli

Marks in Words

Remarks

TH PR TH PR

THO HUNDRED

THIRTY-FIVE

	Max:	Max: Marks		Marks Obt:		Marks in Words	Remarks	
COURSE TITLE:	TH	PR	TH	PR			,	
MA Previous Marks	5	00			235	TWO HUNDRED THIRTY-FIVE		
Poetry "Nazam"	100		- 46		46 L	FORTY-SIX	Pass	
Qaseeda, Masnavi & Marsia	106		60		60	SIXTY	Pass	
lqbaliat	100	 	48		48	FORTY-EIGHT	Pass	
Criticism	100		52		52 1	FIFTY-TWO	Pass	
Essay	100	• .	45		45	FORTY-FIVE	Pass	
General Viva Voce	100		46	•	46	FORTY-SIX	Pass	
Total:	1100		. I'	•	532	FIVE HUNDRED THIRTY-TWO		

Percentage:

48.36

Division:

SECOND

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 infimaled.

within 60 days of the issuance date of this Certificate.

Pag 2 149 Destog 2013

Controller Examinations Hazara University, Mansehra January 04, 2011

DBY

Controller of Examination Hazara University Manscha

. Affected



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

DECLA)
S)/DIPLOMA(S)/TRANSCRIPT/

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

Absistant Controller of Examinations Certificate Section Allama Ighai Open University Islamabad.

Affected

1757 My 2013 DEOGHIE W/ 2013 (F) Minera

IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD

RANI GUL

Name DIL DAR TANOLI Fathers's NameLDAR TANOLI P/O KHAKI

NEAR BY BOMBBY MOSQUE

MANSEHRA Tehsil MANSEHRA District

has successfully completed

Roll No. Registration No. Final Semester

Ŭ625053

04NIA0058 AUT- 2006 Pos Sec

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PRIMARY TEACHING CERTIFICATE

Semester	Course	Title of Course	Ma	rks .
	Code	title of Course	Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	68
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	76
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	62
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE		78
AUT- 06	0617	TEACHING OF URDU	100	:80
AUT- U6	0618	TEACHING OF MATHEMATICS	100	:63
AUT- 06	0619	TEACHING OF SCIENCE PHYSICAL EDUUCATION	. 100	61
AUT- 06	0620	TEACHING OF THE TOTAL SOCIETY	100	GE
		Degatiment of Examinations	100	772
		(Ditificate section)		
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SEPTEMBER 20,2007 Result Declared on

SEPTEMBER 25,2007 Date of issue

900

Percentage / Grade

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.

Affected

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD

RANI GUL Name

DIL DAR TANDLI

Father's Name TAFA TRADERS FARHANA RD KHAKI DILDAR Address TANOLI PZO KHAKI NEAR BY BOMEBY MOSQUE

AJ662484 Roll No. Registration No. 04NMA0059 SPR-2012 Final Semester

MANSEHRA Tehsil

District

MANSEHRA

BACHELOR OF EDUCATION(B. ED)

has successfully completed

Semester	Course	77:41	Ma	ı ks
	Code	Title of Course	Maximum	Obtained
SPR- 11	0513	SCHOOL ORGANIZATION	100	58
SPR- 11	Q514	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	WUR SHOP & TEACHING PRACTICE	100	79
		Department Of Examinations (Cartificate Section) VERIFIED Certificate (Degree/Diploma/Transcript bnaings St. No. 41847716 Cherical (Manuel Correct Section)		
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CREDITS:

Result Declared on

JANUARY 04, 2013

JANUARY 18,2013

Total Marks / Obtained

Percentage / Grade

900

Controller of Examinations

Date of issue

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.

Affected

Sect sllA цэцг D M

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD RESULT INTIMATION CARD

Serial No.

Registration No.

04NMA0058

Roll No.

0688305

Certified that Mr/Ms.

i'ather's Name

DIL DAR TANOLI

has Successfully Completed the

CERTIFICATE OF TEACHING

programme. The detail of course is as under

Address:-

DILDAE TAVOLI P/O KHARI NEAR BY BONDEY HOSQUE, MANYEHRA

Semester	Course	Title of the Course	Marks		
	Code		Maximum	Obtained	
PR-04 0	631	DIMENSIONS IN EDUCATION	100	, 66	
PR-04 C	632	EDUCATIONAL PSYCHOLOGY	100	58	
PN-04 0	633	SCHOOL ORGANIZATION	100	57	
198-0+ C	638	TRACHING STRATEGIES & EVALUATION	100	79	
.UT-04 0	604	URDU LANGUAGE AND ITS TEACHING	100	74	
JF-04 0	605.	SOCIAL STUDIES & ITS TEACHING	100	5 0	
ur-94 o	612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	74	
.09:-04 0	634	english and its teaching	100	54	
UT-04 6	635	ISLAMIAT AND ITS TEACHING	100	64	
Hani Janja		Department Of Examinations (Certificate Section) VERIFIED Certificate/Degree/Diploma/Transcript bearing Sr. No. 42.543 is Checked & Found Correct. Signatures:			

Total Credit Hours

Total AlOU Credits

Total Marks Obtained

Percentage Marks

Result declared on

Date of Issue:

November 21, 2005 Dacember 2, 2005

Confroher 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 confur any right or privilege independently to the grant of proper certificate/degree which will be issued under the Regulations in due course of time. سروك ميكن ال احيد دارون مين أول وقار مؤادها بالإ CEC CEC و بارون التروي بوريا

ررب إيل أيرال ارزول وزر أبيتر (عارته) كالبنز ذايون بالرمست بأروث في أبر Ontaring 19041G و ورايان المواج إذا و والك واست م والكرومن الد ين المال والمركز المركز يميان اسكارمال كرد وكرو فروك بناوير الكالميت كاعورك وكانت سيدو وزاركا بملا ش 2009 کی آباد پرسریم مینورم^{طا}د نبروبر ابرق كالإمانية كنتر يم<u>زان</u>ر مِرى كواليفائية كنفر يمثر الرم ابماليم بزل نان ايزمون الجالحل ما ديماده وكنسزكس برائحة اليمايس المكن تستركنس كميني المجالش شارزيان برائير بمتدلون ام الى : زل كنسز كنر: براتي مث لونذ ايماش اخون دار ^{آخش جي}ل نيز کن 10 رس بر ك كرم در برات الدين ما كرك في كرور برور كالارات اللي كوك الدون كالمراح والدون كالمراح والمراح والمراح والدون كالمراح والمراح والمراح والدون كالمراح والمراح والمر مراعة والراك في المنت فروا مشورة كروى جائد كى وودان كروم والأك عندو والكساس كرف كى تعيل يباد النيذ وكم الناكاة منا . زومزنت بمس الميزاك مناحدة بال 2-6-2011 1 1301000 89.100 ^{اي}ن (المهرومنداومنيندودانزين) ف زمرك وأرارل المراس

Pre Bid Meeting

زر و ملى ك رفز على مورد 2011-5-31 كزيرت 11:00 بي آيد مينك سنفر وك بمن شريدن وبدكان مع المحتال أواء وفرايا برات ولواد ال كام عدال والمعدود والماس كالم 100 دارایات کادراس بران کے ماقر مسل سے بات ہوت اکست کردائی و بات اس کے قام رود بالانتكاد إيت كدما للفرول يستك عل مركت مظلوب ي-

1) ئىندردادىم ئەسىل كەلغىزىم كىلىزىيىز بىلىم كىلى كىلىدىغاتىرىنىنىدرىكىيە ئىكى بىزىن ئەستىرىنىڭ بىلىنى 31.05.2011 كَلَدَوُرُ أَنْكُ كُرُورُ كَالوَاتِ كَارِيمَ أَنْ أَجِالُ مُرْدِدِكَ بِينَ فِي شَارِدِ المراسدودِ وَأَن مَسارَدَ د حادیزات مسلک بوٹ یا تکن ادراک دن bro-bid بھٹ کو اوراک ۔

 (1) كييرلان دُن الدفكال (1) عمر واسلات (فيران الدال ال ما الديديد الديران ومرابر بداريد. (اس المر) كياباني) ATH(III والميكيك ١١) نيزول وكون عدائك الرجيل الناوات إنك المرجيل ج) نینز رکم لے کا درتا پرکی نینز دنا دم جامل ثندی کیا جائے کا خیز درتا دم نینز دکم لے گانا و فائے اسالیہ دان تل امل كرا مردد ك بريز وكي كيدار ذات فرد يافري كاسوف إدخر لي كانواد وك

2) خِنْرَمَامَ وَوَكُورُورَاوْمِ مِنْ وَكُولِولَ كِيمَامِونَ كِيمَامِ الْمُؤْكِدِ وَمُورِدًا فَا مِنْ الْمُؤْكِدِ وَلَا ستشكر الادل بيز)

4) كام كاردف Sublatting كاسرت يم ينذرك من كام يا يا كالدن ومنات مبلك والخلا ن) بيادكى ير 10% مين إدر Bulow وعند دين والمسائكي وادان المائد ل 10% المان المراب وعن ي ا تدرینی کی قرار کے وقع نے اگرفت کریں کے واکر میان تی کے آبد شرارہ Rale Adalysis ک پر هیرت نامیم بدر کار کار Supportiva ایت شاید کار زار در در کاروندا ك ما الكي ادراس ويكداس كيا بازياً -

۵) نیکسول کا زنی مربدة اون مستخت اوک.

AUP No.102-2010-11]

7) ئىندىرىكىدىڭ ئىگىردادان كالى بىمكى بىمۇنىك دىكىدادد (بىكانا ئىر كىكسودىت ئىمىدىد ئىركىنىل كىا بايدا -0) کا کو کی طرف سے تیاد کردہ دوک ہاں کے ۱۹ تی کیا جائے کا جس کی شاف دوزی براور مانت کی مستحل اور

ن) اکر کی اید سے تک داری بروز رستر در سے والی شرائلے ساتھ فیٹر دورد الا دومرل اور تیمری

10) - شيز كادر يم رفع كيداد فروب كرے كادر قام يمثر في كف تركيد دادكان مدادكان دكا-

11) בל נילי הלית על ליבל הלי PEC Registration ביש לידים ב 2011-12-2011 ביש

الكريشوا تجينز

ى أَيْرُ وَبُلِيرَوْ وَرُرِينَ مُرْدَانِ فُولَ 570861

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Affected

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وريتهم كارانيات بالسائير الدين كم كارة تردناون كورن ومراه المان							
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tis			4-7-	09	راے ال ایس کی اسال ذارک کی ک	J'(2)	
١٤. مال	·		11	'	السايم شده مي فيدري بيد بمدايد مالد ونيز	10.0(2	
į	اينا	i≟:			واردان والمراك وكمن اأول تساول		
	1		ŀ	l	رانيين او كرمهارز باللية	. 3	
713	ig	্ৰ	4.7-	14	ا) ئەزىك ئىيىنىدە دەرىن كى كى كىلىم شدە يىرد	1116	
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}					۳ مینز در مزن برد. در منها نان اسلامیات ارد	: 5	
ì	ļ				مرني ادرشبادة الخامس كماهليم شوجيكم		
;			<u> </u>		الزازار الداديء بالألال	1.0	
1 1:1:	انا	121	7-7-	02.	مينزك برر مافذ فراك ادرك تليم شدد	U15 (4 5	
5 <u>زمال آ</u>			. 11	<u> </u>	ادارےے قرات کہند	اً / قارب	
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<u>ز دمالها</u>	_ <u></u>		11		م نوری برما کدار دامانک انزیر کرایر میابید	ا م	
111	ا اینا	(-1	14-7-	15	مِنزَد (مِينَدُ أَوْن) كَا كُلْكِيم مُده مِردُ	(6 ا	
ا ومال			Ш		ب بريم يامتونيم وفاق المدوى ت تهاوة	_;	
•					اماليه لي النوم العربية والالعلامية إ مرايات		
<u></u>					سينفظى الزوكري كم استدى فيدوك		
1:15	ابنا	دينا.	17-7-	07	۱) اترمدن إسادك ريكيك كل كالمليم	ქ(7	
. 3. بال ا	,		11		شر اراے بعد ST مرابنگین از ارسان	اين	
! !			-		ان کرشتر کس تندادات ہے۔ ان کرشتا کس تندادات ہے۔	30	
					r) کمی کار شاره در دراست ۱۷٪ مراسی در	Á	
]				میاند ورون برد می متعامارے سے تمن سالمہ	ğ	
				•		Ģ.	

. برانگام (مرماندواد) سکولوا بی دسیا فی آ سامال ب

نیاد م برکی (2) ما شرمروی اا زی این سطے کی دسا است و دخواست دینے کے با مریو رادے کے دوار مرکز وائش برجس کے شینز کا مرز ال برا امر میکیا و اُن کر الافران ش کی افهام دی شرن دکارت شده و (4) الحدادید داندن که مود در کارکورت شرک accia كون ويا جاسة كالبيد وويال مركارك المازمت مراتجا موسية والمساراة كان كيا وك المالك . در در ال تالم أراد المار (۱۶) أكر كا الميد و

للنام السام الا المالا والماري الماري الم بدى ائى يتوى اكارسات لى ادر لى الشى ألى كاستىم ادف ما ألى يوسنول كيا برخوام لأسكول فير2 إلىم، (بخن ذبيرك) مودند 2011-20-26 كوششش وكالمركم كا عقم يست : ١٩٠٠ (TAT-1) درایا کے کے (TAT-1) نیت قام کا کوات روستان ب الديستون برقرري لي الأيم ادكه (3) إدائل أو الا المارات المالية المارات ((۲۰۲۱م: ترميل فيرسة ول الاريادات ل كينة كذا (۲۰۸۲م) وي موكاز ۱۹۲۸م ۵٫۱ رول تارم واکل کرائے وقت انا مدل تجربسان، فیما شده نیمی اس کے بخیر فیرست کند و پینے کا ابناز ی می کامیاب: اف والے امرد والدول کا بیموشیت عكر بزما: باب آرى ك آند، نيت عي منال مت يركمل إيمال بيم ا القال المستركار كن كر بعده pka بعده المستركار المستركار الما المستركار ال یر دنز رے سلم کیا با جگا ۔ ہدان مرف ای امید دیں کا تروا کی عالی کیا

P- 25 Anne c 2

TAI-1 FEIVI	ALE MANSEHRA RESULT		Ahnx
ill 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
703110 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	SCHOOL ENGLAND	64	Fail
1703118 Sobia		. 48	Fail
1703119 SOBIA	(8)	80	Fail
1703120 BIB	15	108	Fail
1703121 BIBI	1864	108	Fail
1703122 Fozia Bioj:		136	
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 ????N?		68	Fail
1703134 ? :		128	42.67
1703135 KOUSAR		. 116	Fail
1703136 SADIAKANWAL		96	Fail
1703137 SAMEENAFARMAN		128	42.67
1703138 ASMAHAMEED	Affected	80	Fail
1703139 SAIQARAFIQ *	* "	104	Fail
1703140° MAJIDABIBI	P Mai	88	Fail
1703141 MAZLOOMA		124	41.33
1703142 SHABNAM		112	Fail
1703143 PIBIANIQARANI		60	Fail
1703144 SHAHNAZ	<u> </u>	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

اپیل برائے طلبی انصاف،

جناب عالی: 💎 مودبانه گذارش هے که 🤃

عنوان:

ا. یه که سانله نے بحواله اشتہار اخبار (مشرق) اپنی درخواست بعظایق مراجه قدانید درخواس محکمه ایلمینتری این سیکنتری ایجو کیشن مانسهره کی طرف سے جاری درده درخواست فارم په اپنی درخواست دفتر بذا میں جمع کروانی.

۱. ایه که سانله کی جمع کرده درخواست فارم پر آپ جناب کی زیر سر پرستی ایثا تست کے له سانله کو را لنسبر 3110 جاری کیا گیا جس پر سانله نے ایثا تست دیا اور 176/300 نمبروں سے کامیاب ہوئیں

علی اید که ریزلت بک میں ایتا وال رکی غلطی کی وجہ سے سائلہ کے والد کے نام علم ماند کی اید کی سے سائلہ کے والد کی نام علم میں تنام اخری میرت لست سے خارج کر دیا گیا ہے جس کی وجہ سے سائلہ کی حق تلنی کرتے ہوناقابل تازهی نتصان (Ir-Repairable loss)دیا گیا ہے۔ ایدا والد رسی غلطی کی سزا سائلہ کو کیوں دی جا رہی ہے ایتا کا ٹسٹ کسی امیدوار کے کہنے پر نہیں بلکہ محکلہ کا اپنا فیصلہ ہے۔ اور اگر ایتا والے کسی کا نام غلط لکیا دے کسی کی والدیت نسی کی نعام غلط لک نام غلط لک دے تو اس میں امیدوار کا کیا قصور ہو سکتا ہے۔ موجودہ ایتا بکہ میں سیکہ میں ایسی غلطیاں موجود ہیں۔ محکمہ کو چاہئے تیا کہ وہ ایسے لوگوں کے کوانف کے بارے اینا سے ویرفید نے کوانر مگر ایسا نہیں کیا گیا۔

یہ کہ سانلہ ایک کوالیٹاینڈ ٹیچر سے جس کی تعلیمی قابلیت درج ذیل آتی۔

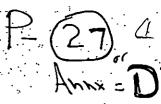
å.	فسبت لأويثرن	528/850	ميثرك
14.	سيكنظ لأويزن	524/1100	ایف الے
787	سيكث تأويزن	276/550	بی اے
3/5/2012	سيكث تأويژن	532/1100	ایم آئے
•	فست لأويزن	628/900	پی ٹی سی
	فيست لأويزن	584/900	ىسى ئنى ْ
	سيكند لأويون	176/300	ايثا تسك

جبکه میرا بی اید اس وقت جاری تبار جناب عالی جب سائله نے دیکیا که سائله سے بہت کم تعلیس قابلت رکینے والی امیدواروں کے ارتاز بہ چکے ہیں اور میرا ارتاز نہیں ہوا تب میں ای جناب نے باس اپنی ایدل نے کے آئی ہوں تا که میں ساتھ یہ طلم نہ کیا حالے جناب عالی سائله ایک غریب خاندان سے نعنق ، نہتر اور سائله کا والد عرصه دراز سے بیسار ہے ، سائله نا کوئی ذریعہ روز گار نہیں اور بہت مشکل سے وقت کہ تاری آپ جناب سے اپیل کی جاتی ہے کہ سائلہ کے بحثیت PST کسی بھی پرائمبری سکول میں تعینات دیا جا ہے سائلہ تا حیات دعاگر رہے گی اور سائلہ کہ بحثیث کو سائلہ کو بائی کورٹ جانے کیا دیت بہیں ان نیا دیا ۔ خود سائلہ کے سائلہ کے سائلہ کے بائی کورٹ جانے کیا دیت بہیں ان نیا دیا ۔

Attended 13503

13503-3860739-0

Ralfal



CE 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. Fre/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.

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- 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 bases
- 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 1st 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. 1120-21/Estt: Apptt:PST//2011-12 Dated Mansehra the 29/6 2012

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

EXECUTIVE DISTRICT OFFICER . E&S EDU: MANSEHRA EDO Umar Khan Kan & their CM NO: 436A in WP No: 592-A higheourt directed petiotioner hence is varifie

3. 4.



OFFICE OF THE EXECUTIVE DISTRICT OFFICER **E&SE DEPARTMENT MANSEHRA** /ESTT: DATED MANSEHRA THE

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

Copy forwarded to the:

1. The District Officer Female E&SE Mansehra.

2. The Deputy District Officer Female E&SE Mansehra.

The Assistant District Officer E&SE Circle Dhodial. 3.

The Head Teacher GGPS Hari Nakka. 4.

5. The Teacher Concerned.

> EXECUTIVE DISTRICT OFFICER, E&SE MANSEHRA

P-30

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

Ann = 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)

Hested

Dated /6 /08/2012

Copy to the ;-

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

DY:DISTRICT OFFICER (F) E&S EDU: MANSEHRA

0/

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.

Sil	Name of Teacher	From (GGPS)	To (GGPS)	Remarks
1.	Aisha Yousaf,SPST	Devel	CMS Choian	Against V/Post
	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	Lami	Chinarkote	Against V/Post
	Hamida Begum,PST	Seri Subedar	Charrian Battal	Against V/Post
6	Musarat ,SPST	Karkala	Fazal Abad	Against V/Post
7.	Hajra Jamil,PST	Lassan Nawab	Palsala ·	Against V/Post
8	-	Bandi Badhan	. Maira Hajam	Against V/Post
9	Somia	Gara Kawai	Pairan Mansehra	Against V/Post
1(Bangian	Against V/Post
1.	Uzma Sarfaraz	Badal Gran	Ichrian	Against V/Post
1.	2 Nusrat	Kotly Bala		Against V/Post
1.	3 Santeena Gulab	Pudnial	Afzal Afad	
1.		Chitti Mohri	Madsarian	Against V/Post

Motor- 1. Charge Report should be submitted to all concerned.

2. No TA/OA allowed.

`Sd/-DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

Endst: No. 475-80/Adjustment Need basis,

Dated Mansehra the 33/01/2014

Copy to:-

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

The District Accounts Officer, Mansehra.

The District Education Officer (Female) Mansehra.

All ASDEOs (Female) Circle Concerned.

Teachers Concerned.

rOffice File.

SUB DIVISIONAL EDUCATION OFFICER

(FEMALE) MANSEHRA.

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

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:

4200-Professional Tax

P Sec:001 Month:April 2015

MA7044 -Dy D O (F) Pry Edu Mansehr

Min: Education Schools

NTN: GPF #:

old #:

MA7044

1,306.00

1,200.00

1,200.00 2,177.00

653.00

1,600.00

800.00

8,000.00

16,936.00

Subrc:

100.00

Total Deductions

02 Years 10 Months 006 Days

100.00

16,836.00

D.O.B

24.06.1984

LFP Quota:

HABIB BANK LIMITED

SHINKIARI ROAD, MANS

7900259303

Altested

Manshra

PScs #: 00712174

Buckle:

Name: RANI GUL

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

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5801-Adj Basic Pay

Gross Pay and Allowances

DEDUCTIONS:

P Sec:001 Month: May 2015

MA7044 -Dy D O (F) Pry Edu Mansehr

Min: Education Schools

NTN:

GPF #:

Old #:

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

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No 7926/AF (1)(F)

Dated •//10 / /201

SHOW CAUSE NOTICE.

Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, do thereby serve you Mst. Ram Gul. PEC GGPS. Monjahnr Mansehra as follows.

- 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 just through FATA, your name did not full 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 well and westess, against the recruitment rules, as per inquiry report received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)t &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.

Lam sattafied that you have committed the following acts/omissions specified in rules.

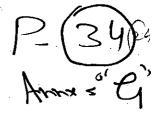
- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recontoient
- h) inflected huge financial losses to the Govt: Treasury receiving pay and result of bogus appointment
- by snatching established rights of the deserving candidates due for appointment on merit.
 Cheating / cancelling the facts for unlawful appointment with collusion of then EDO.
 - 1. As a result thereof, has competent authority, have tentatively decided to impose upon you the major plenty of dismissal from services under rule 4 of the said rules.
 - 2 You are, hereby, required to show dause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
 - 3. 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 exparte action shall be taken against you.

4. A copy of relative page of the finding of the inquiry committee is enclosed

Mst. Rani Gul, PS1 GGPS Monjahni.

OMPLIENT AUTHORITY

District Education Officer'
(Female) Manschra





Whare as Mst: Poni Gud Divant Tonol working as PS_GGHS/GGMS/GGP Yonjani was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 the charges mentioned in her Show-Cause Notice. 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 (Nov Secretary Zakat, Usher and Social Welfare Department) ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur. And where as the inquiry Committee after having examined the record pointed out that you we appointed illegally and against the recruitment rules and policy. 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 agains you have been proved. 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. Pan Gut
as St GGHS/GGMS/GGP Yon An was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 the charges mentioned in her Show-Cause Notice. 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 (Nov Secretary Zakat, Usher and Social Welfare Department) ii) Mr. Akhalhad Baig, Principal BS-20 RITE Male Haripur. And where as the inquiry Committee after having examined the record pointed out that you we appointed illegally and against the recruitment rules and policy. 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 agains you have been proved. 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
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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
CT/PET/TT DS1 GGHS/GGM GGPS Manjani
ADISTRICT EDUCATION OFFICE
DISTRICT EDUCATION OFFICER FEMALE MANSAEHRA.
st: No: 1946-55/AE/Estab: dated
Copy to the:- cretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar. rector Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar. strict Accounts Officer Mansehra.
strict Monitoring Officer Mansehra
eputy Commissioner Mansehra. incipal/Headmistress
DEO(F) Mansehra.
udget and Accounts Officer Local Office.

DISTRICT EDUCATION OFFICER FEMALE MANSAEHRA.

Attested

10.Office File.

P-(35) Amx = "H"

The Director,
Elementary & Secondary Education,
Knyber Pakhtunkhaw Peshawar

Subjects-

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDORSEMENT NO. ______DATED 3RD 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".

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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 REJINSTATE THE APPELLANT WITH ALL BACK BENEFITS AT THE SAME STATION.

Respected sir:-

4.

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.

That the then Executive District Officer E&SE Mansehra invited applications (or recruitment of teachers of various cadres in District Mansehra through advertisement published in daily MASHRAQ.

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.

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

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 Lami Battal.

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)

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.

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

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.

That the appellant was not paid any salary after her appointment up to 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 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

11

6.

- 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 impogned 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.

Rani Gul PST D/O Dildar

Mohallah Near Braff Khana, Pakhwal Road

PO Mansehra Tehsil & District Mansehra

CNIC No.13503-3860739-0

Attested

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Attested

OFFICE OF THE RETURNING OFFICER



Natio	nal Assembly -20
Přovi	nce Khyber pakhtoonkhwa-56
No:	127-

Date 24/4/2013 .

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/Poiling Officers are hereby made.

Totling 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 1	1 th May 2013.	St. C. docimation of	Name of assistant
Name & designation of presiding officer	Name & designation of Assistant presiding officer	Name & designation of polling officer .	presiding officer designated as presiding officer
Doctor Muhammad Shoaib SMO RHC 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.Ghafran 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	Dehri Haleem 03335062487 2.Muhammad Haroon PST GPS Dheri Haleem 03229227189 ***********************************	Taj Malook CT Chatter Plain
Rolling	8.Gufshan PST GGPS Single Kot 03348351299		

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),

Formules: 29:84.2013 (For Pr.Off and APOck.

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

Venue: Government Commerce College & Management Sciences, Mansehra.

Returning officer PK-56 Mansehra-IV Returning Officer NA-20 Mansehra-I



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
<u>l</u>	Noreen Manan	Sr. PET	GGHSS Murad Pur	3003574546
2	Perveen Akhter	Sr. CT	GGHSS Murad Pur	3450572880
3	Attia Gul	SrPST	GGCMS FAQIR ABAD TAJAL	0.00072000
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 5	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
<u>l</u>	Bibi Zahida Mahjabeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
2	Sameena Tamkeen	Sr. PST	GGPS MANSEHRA NO.3	3155819465
3	Tehmina Gul		GGPS MANSEHRA NO.3	3155819465

TRAINING SCHEDULE

elfal Date

Time

<u>Venue</u>

23-05-2015

8:30 am

Government Higher Secondary School No. 1 Mansehra.

Please ensure your attendance in the training.

Asset

BEFORE THE HONORABLE HIGH COURT PESHAW BENCH ABBOTTABAD

COC No. 69/A-2013 W.P. No. 92-A/2013

Mst. Rani Gul	••••••••••••••••	Petitioner
	e agrant e commo	
	Versus -	
DEO (F) Mansehra	Same and the same a	Respondent

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

Respectfully Sheweth.

- That the respondent is a straight law-abiding person and 1. she knows the status and respect of this Honorable High Court:
- That, complying with the directions and order 2. 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.
- 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

FI ED

P-42 Annx=L

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM 'A' FORM OF ORDER SHEET

		102-	
_	_	· ·	OR PROCEEDINGS WITH SIGNATURE OF
Г	Date of Order	ORDER	JUDGE/JUDGES
	or Proceedings		2
1 124 A /2013 in W.P.T			-A/2013 in W.P No.592-A/2013.
Γ	02.08.2013		
		Present:	Malik Ashfaq Ahmed Jillani, Advocate, for applicant.

	A PESHAWA	MRS IRSH	AD OAISER, J:- Through the instant C.M,
	W. N.	the petitions	er seeks release of her salary for the services
		renderca y	her in the capacity as teacher of Government
		Since	, the petitioner is a regular employee of
·V	UN ST		department and she has been rendering her
	MARITAN	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
ļ		the salary	of the petitioner forthwith till disposal of the
	•	main writ p	etition.
		The	office is directed to fix the main writ petition
•			summer vacation.
		This	C.M is disposed of in the above terms.
			COOK - NUDGAE
	Cert	ified to be Tru	e Copy
		Destricted the	ourt
	Ainth	Abbottabile Deca75 A	actor Surins

Z

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

Annx = 1

FORM 'A' FORM OF ORDER SHEET

		ORDER OR PROCEEDINGS WITH SIGNATURE OF
-[Date of Order	ORDER OR PROCEEDINGS WITH SIGNATIONS
ļ	or Proceedings	JUDGE/JUDGES
	1	L 500 A 10012 P
İ	25.02.2014	COC No. 69-A/2013 in W.P No.592-A/2013 &
1	23.02.201	CM.No.434-A/2013.
1		CIVI.INO.HJ H J V Z V X J Y
		Present: Malik Ashfaq Ahmed Jillani, Advocate along with applicant.
	- 0 E	AAG along with Shamim Akhtar DEO (Female) Manschra.
		WAOAR AHMED SETH, J:- Shamim Akhtar, DEO
	W. C.	(Female) Mansehra present in Court submitted pay bill of
	The same of the sa	the petitioner. According to which the pay bill has been
		prepared till 28.02.2014. The petitioner is directed to
		receive the same.
		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.
		Announced. 25.02.2014.
: ص:	unifical (E) -	
	rified to be True	Copy
	11: 00	7/4
	Reshawar Jugit Col	
	Abbottabad Benci	A
j.	orised Under Seco76 Acid	Diurns
	,	

وكالت نامه

KPK bank
بعدالت جناب سروس رئيس لي المراك المراك المراك وعزو المراك على المراك المراك المراك المراك وعزو المراك المر
منجاب المسلم
على اجرم رقس إساعث كريراً نكه
مندرجہ بالاعنوان میں اپی طرف ہیں وی وجواب دہی بنام علائ استفاق 21 د عیلائی لائو معدد العام مندرجہ بالاعنوان میں اپی طرف ہیں ہرخود یا بذریع مختیار خاص روبروعد الت حاضر ہوتار ہوں گا ۔ خان (مدیدہ فیص کی کورٹ بدیں شرط و کیل مقرر کیا ہے میں ہرخود یا بذریعہ مختیار خاص روبروعد الت حاضر ہوتار ہوں گا ۔
حان در موجه و کا بادوت بدل مرطوی مرطوی مرازیا ہے یہ ہر وویا بدر میں میں مراف و مردوں کا ایک در موجود ہوت کا مر * اور بوقت بکارے جانے پروکیل صاحب موصوف کواطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہوااور غیر حاضری
کوجہ سے کسی طور پر مقد مدیم نظاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمددار ند ہو گئے نیز وکیل صاحب
موصوف صدر مقام کچبری کے علاوہ کسی اور جگہ کچبری کے مقررہ اوقات سے پہلے یا پروز تعطیل پیروی کرنے کے مجاز نہوں
گے اور اگر مقد مدمقام کچبری کے کسی اور جگہ ساعت ہونے پر بروز کچبری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کوکوئی
نقصان پنچاتو ذمہ داریااس کے داسطے کی معادضہ ادا کرنے ، مختیار نامہ دالپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے کہ جھے کل ساختہ پر داختہ صاحب مثل کر دہ ذات خو دمنظور وقبول ہوگا اور صاحب موصوف کوعرضی دعل می اور درخواست
ہونے کہ بھے ماسا کھتا ہروا کھتا مان دائر کرنے نیز رو پیدوصول کرنے اور دسید دینے اور دخل کرنے کا ہر تم کا بیان دینے اور ا
سپرد ٹالٹی وراضی نامہ و فیصلہ برخلاف کرنے وا قبال دعل کا اختیار ہوگا اور بصورت اپیل و برآمد گی مقدمہ یا منسوخی ڈگری
یطرفه درخواست علم امتناعی یا ڈگری قبل از فیصله اجرائے ڈگری بھی صاحب موصوف کوبشرط ادائیگی علیجد ہیروی
مختیارنامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا پیل کے واسطے کسی دوسرے وکیل یا ہیرسٹر کو بجائے اپنے ہمراہ
مقرر کرئے اور ایے مشیر قانونی کو بھی اس امر میں وہی اختیار ات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے اوانہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کرئے اورالی حالت
تاری بیلی سے پہلے اوانہ کروں کا توصاحب تو صوف تو چورا استیار ہوگا کہ صدیمیں بیروں کہ ترسے اور ایس سے میں میں م میں میر امطالبہ صاحب موصوف کے برخلاف نہیں ہو گالہذا مختیار نامہ لکھ دیا ہے کہ بیسندار ہے صفمون مختیار نامہ کن
یں برر عابد کا مجار سبھ لیا ہے اور منظور ہے۔ لیا ہے اور اچھی طرح سبھ لیا ہے اور منظور ہے۔

1/07/2015 (3/1)
Accepted - My PST J'isty

Arther

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

BOTVICE Diary No.

In the matter of Appeal No. 746 /2015

> RANI GUL.... . (Applicant)

Versus

Govt of Khyber Pakhtunkhwa through 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.

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 Telbural.

Dated: ____/11/2015



AperINO 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:-

- 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.
- 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,
Knyber Pakhtunkhwa, Peshawar.

No. _____/F.No._____/Appeals Female MSR Dated Peshawar the 201/2015

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

Appellants concerned

5. PA to Director E&SE KP, Peshawar

Master File.

Deputy Difector (Fémale)
Directordie E&SE, KP
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

	Amended Appeal No. /	<u> 2016</u>
MST Rani Gul	APPEL	LANT.
VERSUS		
1. Govt Khyber Pakhtunkhwa (KPK), th Peshawar, and Others	rough Secretary Education	n KPK
1 Cshawai, and Others	RESPONDENT	S
WRITTEN REPLY ON REHAE OF RES	DOMBENTO 4 OANIB O	

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.

- 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, 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 adjustment union council by the concerned authority. A According with the report of inquiry

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

appinted 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 does'nt 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 sevice on vide Endst no 1946-55 dated 03-03-2015 by the District Education Officer (Female) Mansehra.

(Copies of showcause & 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.

GROUNDS.

- 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. Pra 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
- 1. 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

Pukhtoonkhaw through Secretary Education Civil Respondent No Government Secretariat Peshawar.

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

Respondent No 3 _

enjale) Mansehra District Education Officer

B

AFFIDAVIT

I, Mis.Shamalia, ADEO District Education officer(F) Manserha, do hereby solemnly affirm and declared that the contents of repy in the instant Appleal No 74615 titiled case Rami Gul versus Education are correct and tru to the best of my knowledge and belief and I have concealed nothing as material facts before this honorable court.

RESPØNDENT



GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION

DEPARTMENT

Dated Peshawar the February 27, 2014



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.
 - Syed Hidayat Jan, (PCS SG BS-20), Special Secretary, Agricultural
 Department, Khyber Pakhtunkhwa Peshawar (now Secretary Zakat, Usher, and Social Welfare Department.
 - ii. Mr. Khallag 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.
- 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.
- NOW, THEREFORE, in exercise of the powers conferred under section 14 of Knyber 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), Mansehral 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.

(MUJEER-UR-REHMAN)

SECTION OFFICER (SCHOOLS/MALE)

G THE YEAR 2012 AND 13 IN OFFICE OF . EDO, ELEMENTARY AND NDARY EDUCATION, DISTRICT MANSEHRA APPOINTMENTS OF FEMALE CHERS IN VARIOUS CADRES WERE CARRIED OUT PURSUANT TO AN ERTISEMENT PUBLISHED IN DAILY AAJ DATED: 20-05-2011, WHEREIN CERTAIN AEGULARITIES/ILLEGALITIES IN VIOLATION OF RULES AND PRESCRIBED TOOCEDURE WERE NOTED, THEREBY RESULTING IN BREACH OF MERIT/ILLEGAL RACTICE 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

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.

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

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.

PROCEEDINGS:

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 ppointment orders of the teachers quoted in subject enquiry (Annex-III)

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

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

SIM

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).

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 Minster 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 gated 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)).

<u>FACTS</u>

REPLIES TO THE CHARGE SHEET:

REPLY OF MR UMER KHAN TO THE CHARGE SHEET:

Mr. Umar Khan EX- EDO E&SE Mansehra in his reply of charge sheer 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).

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NOTIFICATION.

WHEREAS, Mst Rani Gul, PST at Government Girls Primary School Manjanie 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:-

- 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 merite 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.

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

District Education Officer (Female) Mansehra

District Accounts Officer Mansehra 2.

Sub Divisional Education Officer (Female) Mansehra 3.

Appellants concerned 4.

PA to Director E&SE KP, Peshawar

Master File.

Deputy Director (Fèmale) Directorate E&SE, KP

Peshawar

VAKALAT NAMA

/20

IN THE COURT OF <u>Service</u> Pribur	ral Reshawar
Rani Gul	(Appellant) (Petitioner) (Plaintiff)
VERSUS	
Sancation Dept. etc	
I/We, Rani Gw Appellant	
1/VC, Can Tu	'
Do hereby appoint and constitute <i>M. Asif Yousafzai</i> , <i>Peshawar</i> , to appear, plead, act, compromise, withdr me/us as my/our Counsel/Advocate in the above noted his default and with the authority to engage/appoint a my/our costs.	raw or refer to arbitration fo matter, without any liability fo
I/We authorize the said Advocate to deposit, withdraw as sums and amounts payable or deposited on my/our acco. The Advocate/Counsel is also at liberty to leave my/oproceedings, if his any fee left unpaid or is outstanding a	unt in the above noted matter our case at any stage of th
Dated	(CLIENT)
ACCEPTED ALL ALL ALL ALL ALL ALL ALL A	
Advocate Supreme Court	

Peshawar.

Taimur Ali Khan Advocate High Court Syed Nauman Ali Bukhari Advocate

OFFICE:
Room # FR-8, 4th 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: $\frac{2}{1}$

Wocate High Court. Abbottabad

Muhammad Arshad Khan Tanoli Advocate High Court

cell No. 0346-9583 Office Not 33 Adjacent to Disti Bar Abbottabad