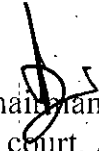


15.08.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Learned counsel for the appellant requested for adjournment to submitted rejoinder. To come up for rejoinder and final hearing on 17.01.2017 before D.B at camp court, Abbottabad .



Member

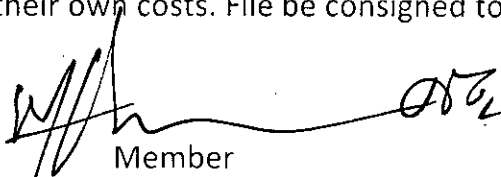
  
Chairman

Camp court, A/Abad

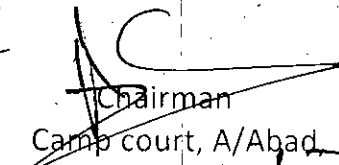
17.01.2017

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

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



Member



Chairman  
Camp court, A/Abad

ANNOUNCED  
17.01.2017

17.01.17

18.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that identical service appeals No.758 to 789/2015 have already been admitted to regular hearing and fixed for further proceeding on 20.10.2015.

In view of the above, this appeal is also admitted to regular hearing. 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.

Appellant Deposited  
Security & Process Fee



  
Chairman

Camp Court Abbottabad

20.10.2015

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

  
Chairman

Camp Court A/Abad.

21.1.2016

Agent of counsel for the appellant and Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 15.8.2016 at Camp Court A/Abad.



  
Chairman

Camp Court A/Abad

Form- A  
FORM OF ORDER SHEET

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

Case No. 826/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	15.07.2015	<p>The appeal of Mst. Saman Naz presented today by Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	29-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>18-8-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

*Appeal No. 826/2015*

Mst. Saman Naz d/o Muhammad Younas (CT GGMS, Kotri Sathan Gali) R/o Mohallah Sain Abad, Tehsil & District Mansehra

.....Appellant

**VERSUS**

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

.....Respondents

**INDEX**

S.No	Prescription of Document	Annexure	page
1	APPEAL		1-10
2	Copy of Advertisement	"A"	//
3	Copies of Documents/testimonial are annexed	"B"	12-20
4	Copy of appointment order and corrigendum	"C"	21-22
5	COPY OF SHOW CAUSE NOTICE	"D"	23-26
6	Copy of impugned dismissal order of appellant	"E"	27
7	Copy of departmental appeal /representation	"F"	28-31
8	Wakalatnama		

Dated: *11/7* /2015

*[Signature]*  
Appellant

Through

*[Signature]*  
~~Muhammad Arshad Khan Tanoli~~

Advocate, High Court  
Abbottabad

①

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Appeal No. 826/2015

**E.W.F. Province**  
**Service Tribunal**  
Diary No. 856  
Dated 15-7-2015

Mst. Saman Naz d/o Muhammad Younas (CT GGMS, Kotri Sathan  
Gali) R/o Mohallah Sain Abad, Tehsil & District Mansehra

.....Appellant

**VERSUS**

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

.....Respondents

**SERVICE APPEAL.**

**Service Appeal u/s 4 of KPK Service**  
**Tribunal, 1974**

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is  
as under:-

1. That, respondent No 3 announced the posts of CT in Dailly  
"The Aaj" dated 20/5/2011 for appointment of CT  
teachers. The Appellant fulfills the entire criteria which is  
sine qua non for appointment for the post of CT Teacher.

**Copy of Advertisement is annexed as Annexure "A"**

Filed today  
15/7/15

2

2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, F.A/F Sc PTC with extra qualification. **Copies of Documents/testimonial are annexed as Annexure "B"**
  
3. That, following this, the appellant was appointed as CT Teacher in respondents' Department on the basis of merits and was posted in GGPS vide appointment order endrst No 6879-85/ Estbb: Appoit CT Mansehra Dated 31.05.2012. **Copy of appointment order and is annexed as Annexure "C".**
  
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 31.5.2012 onwards.
  
5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 1462-1471/AE-1J/ESTB on 3.3.2015.
  
6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi and DEO, Shamim Akhtar was found attached with the show cause notice, wherein

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it was mentioned against the name of appellant that "that appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes as against the recruitment rules". AS the inquiry committee did not recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of CT Teacher and appeared in ETTA of the merits list and thereafter was appointed on merit. Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their requisite qualification from recognized Institution to be appointed "as per service structure in prescribe rules the requisite qualification against the vacant post of CT Teacher is taken into consideration and thereafter appointment made on merit.

**Copy of Show Cause notice is attached as Annexure "D"**

8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order

4

endst. No 1462-1471/AE-1J/ESTB dated 03.03.2015. **Copy of impugned dismissal order of appellant is attached as annexure "E".**

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 26.3.2015. **Copy of departmental appeal /representation is attached as annexure "F"** but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

### **GROUND**

- a. That, the appellant fulfilled the criteria of appointment as CT being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed on the merit list.12
- b. Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.



- c. That, as per educational record annexed with the appeal, the appellant has been appointed as CT according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that there were vacant post of CT in the Union Council of the appellant but respondent No 3 did not appoint the appellant in her Union Council. However later on she was to be posted in her own Union Council. It is worth mentioning that there was no contesting candidate in the Union Council where the appellant was appointed as per law and procedure mentioned in the advertisement.
- d. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as CT. But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- e. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore,

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respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in future as well. Hence impugned dismissal order is liable to be set aside.

- f. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.
- g. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- h. That, right from the appointment of the appellant as CT in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- i. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of removal of Umar Kundi from service, the appellant

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cannot be dismissed for the acts committed by the Ex-EDO.

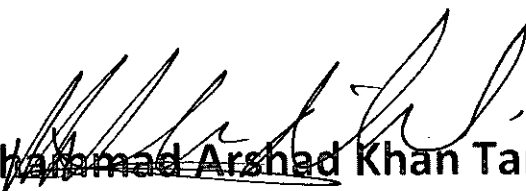
j. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 1462-1471/AE-1J/ESTB dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc. Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 11/7/2015

  
Appellant

Through

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

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**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Mst. Saman Naz d/o Muhammad Younas (CT GGMS, Kotri Sathan Gali) R/o Mohallah Sain Abad, Tehsil & District Mansehra

.....Appellant

**VERSUS**

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

.....Respondents

**APPLICATION FOR SUSPENSION**  
**OF IMPUGNED ORDER NO 1462-**  
**1471/AE-1J/ESTB AND GRANT OF**  
**STATUS QUO TILL FINAL DISPOSAL**  
**OF THE MAIN APPEAL .**

Respectfully Sheweth,

1. That the instant service appeal is being filed today and this application may be treated as part and partial of the service appeal.
2. That, competent authority i.e District Education Officer (Male) Mansehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued
3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the

⑨

applicant has not been contested by any one as there was no contesting rival candidate.


5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

It is, therefore, very humbly prayed that on acceptance of the instant application, impugned termination order dated 03.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: 11/7/2015

  
Appellant.

Through

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

10

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Mst. Saman Naz d/o Muhammad Younas (CT GGMS, Kotri Sathan Gali) R/o Mohallah Sain Abad, Tehsil & District Mansehra

.....Appellant

**VERSUS**

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

.....Respondents

**AFFIDAVIT**

I, Mst. Saman Naz d/o Muhammad Younas (CT GGMS, Kotri Sathan Gali) R/o Mohallah Sain Abad, Tehsil & District Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 11/7 /2015



Deponent

(B)  
P-11  
Amara  
A

بروز	تاریخ	موضوع	تاریخ	موضوع
1	09-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے	09-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے
2	11-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے	11-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے
3	14-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے	14-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے
4	19-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے	19-07-11	انٹرنیٹ ایسوسی ایشن کی طرف سے
5	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے
6	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے
7	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے
8	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے
9	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے
10	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے	26-06-2011	انٹرنیٹ ایسوسی ایشن کی طرف سے

**Pre Bid Meeting**

ذرا غور سے پڑھیں اور 31-5-2011 کو 11:00 بجے ایک بینک سٹور میں ہونی  
 امکان سے کام لے کر حقائق اور ضروریات کو مدنظر رکھ کر کام سے متعلق حقائق اور اہم کام کا  
 00 بجے ہونا چاہئے اور اس میں ہر کام کو حتمی بنانے کے لیے ایک گھنٹہ کی بات چیت ہونی چاہئے۔

1. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 2. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 3. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 4. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 5. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 6. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 7. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 8. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 9. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 10. **انٹرنیٹ ایسوسی ایشن کی طرف سے**

2-5-2011  
 8-6-2011  
 15-6-2011

1301000  
 89.106  
 102-2010-11

1. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 2. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 3. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 4. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 5. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 6. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 7. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 8. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 9. **انٹرنیٹ ایسوسی ایشن کی طرف سے**  
 10. **انٹرنیٹ ایسوسی ایشن کی طرف سے**

0937-870861

Attest  
 [Signature]  
 (Name: Courts Abbottabad)

ADA 0041519

Roll No. 3610

P-12  
ANNEXURE

"B"

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION  
Abbottabad N.W.F.P. Pakistan  
Secondary School Certificate Examination  
SESSION ANNUAL 1998

THIS IS TO CERTIFY THAT SAMAN NAZ

Son/Daughter of MUHAMMAD YOUNIS

and a student of GOVT GIRLS HIGH SCHOOL, NO: I MANSEHRA

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 1998.

as a *Regular/Private candidate*. He/She obtained 565 Marks out of 850

and has been placed in Grade B Representing VERY GOOD

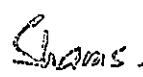
The Candidate passed in the following subjects.

- |            |                     |          |                |
|------------|---------------------|----------|----------------|
| 1. English | 3. Islamiyat        | 5. MATHS | 7. GEN SCIENCE |
| 2. Urdu    | 4. Pakistan Studies | 6. MBH   | 8. ISL STUDIES |

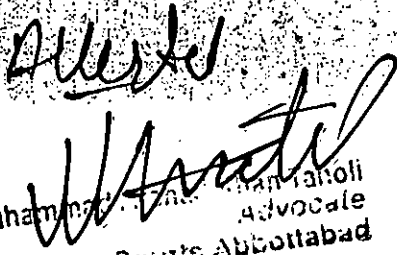
He/She has been awarded Grade A on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is THIRD MARCH  
one thousand nine hundred and EIGHTY ONE. ( 03-03-1981 )

  
Asst. Secretary

  
Secretary

This certificate is issued without alteration or erasure.

  
Muhammad Zahid Manjholi  
Advocate  
Distt: Courts Abbottabad

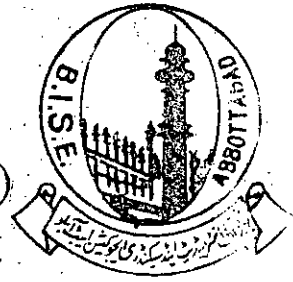


18

P-13

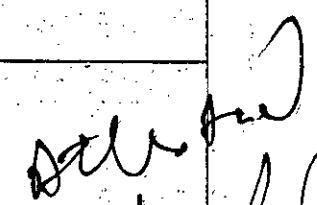
# Intermediate & Secondary Education ABBOTTABAD

## DETAILED MARKS CERTIFICATE Intermediate Examination (Humanities Group) Part - II



Session 200 D (Annual/Supplementary)

Naz  
hammad Younis Roll No. 20145

Subjects Marks	MARKS OBTAINED				REMARKS
	Part - I	Part - II	Total in		
			Figures	Words	
100			74		 Muhammad Younis District Advocate District Courts Abbottabad
100			102		
50			56		
50			113		
100			123	Six hundred & sixteen	
100			148		
100			616	C	

excepted

*Handwritten signature/initials*

**UNIVERSITY OF PESHAWAR**  
(PAKISTAN)

P (14)

No. 009720



Roll No. 9720

**Detail Marks Certificate**

**B.A. Part II (Supplementary) Examination, 2002**

Name Saman Naz

Father's Name Muhammad Younas

Certified that the candidate secured the following marks and is placed in Second Division.

SUBJECTS	MAXIMUM MARKS	MARKS OBTAINED	
		IN FIGURES	IN WORDS
1. English (Compulsory)	75	27	Twenty Seven
2. Isl. Studies	75	54	Fifty Four
3. Geography	75	43	Forty Three
4. Pakistan Studies (Compulsory)	40	14	Fourteen
Total Marks of B.A. Part - I	285	138	
<small>Errors &amp; omission are subject to subsequent rectification.</small> <b>TOTAL</b>	550	290	Two Hundred + Ninty only

The Examination was taken as a WHOLE IN PARTS.  
(Minimum passing marks in each subject/paper is 33% & 36% in aggregate)

Prepared by \_\_\_\_\_ 19 APR 2003

*M. J. Khan*  
**CONTROLLER OF EXAMINATIONS,**  
**UNIVERSITY OF PESHAWAR.**

*Attest*  
*Muhammad Arshad Khan Tanchi*  
**Muhammad Arshad Khan Tanchi**  
**Advocate**  
**Distt: Courts Abbottabad**

Government Degree College for Women

Mansehra (Hazara)

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Provisional & Character Certificate

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This is to certify that SAMAN NAZ  
Roll No. 20145 D/o MUHAMMAD YOUSAF was a  
student of this College and appeared for F.A. / F. Sc. / B.A. / B. Sc. examination  
of the Abbottabad Board / Peshawar University 19 2000  
as a Regular candidate. Reg. No. 10-AB / P-GMA - 98 - 3718

She passed in C Division securing 666  
Marks. She passed in the following subjects.

- 1. English
- 2. Urdu
- 3. Islamic Education
- 4. Pk. Studies
- 5. Eco
- 6. Is
- 7. Geo.

Her date of birth according to the record of this office is 03-03-1981

(in figures) 03rd March 1981

in words \_\_\_\_\_

She bears good Moral character.

Remarks (if any) \_\_\_\_\_

Date 8/2/2001

MA  
Principal  
Govt. College for Women  
Mansehra (Hazara)

Attested  
[Signature]  
District Judge  
District Court Abbottabad

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(10)

Roll No. 73

# REGIONAL INSTITUTE OF TEACHERS EDUCATION (FEMALE)



GHAZIKOT, MANSEHRA.

## PROVISIONAL & CHARACTER CERTIFICATE

Session 2007 - 2008

This is to certify that Miss Sarman Naz

Daughter of Muhammad Younis who has been a regular student of JDPE / ~~D.M~~ / Diploma in Education class has passed the Departmental Examination of the Board of Peshawar held on 12-8-2008. She has obtained 858 marks, 1st Division.

Date of declaration of result 31-12-2008

Elective subject \_\_\_\_\_

Distinction \_\_\_\_\_

Her conduct during her stay in this institution was Good

P. By. Muhammad  
Checked by \_\_\_\_\_

Muhammad  
Dis. Comm. Advocate

Date 31-01-2009

PRINCIPAL  
RITE (F), Mansehra.

S.No.

1607

# Departmental Examinations Education Department

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NWFP

## DETAILED MARKS CERTIFICATE

PHYSICAL EDUCATION TRAINING EXAMINATION, 2008

Name Sattar Naz

Session 2008

Father's Name Muhammad Yousaf

Roll No. 73

Subject	Maximum Marks	Marks obtained	
		In-figures	In words
1. Prof. Organization and Admn.	100		75
2. Se. of Movement	100		75
3. Theory of Games	100		70
4. Olym. and Recreative Games	100		69
5. Anotomy and Physiolog	100		72
6. Health Education	100		76
7. Teaching & Skill of Edu. Gym.	100		94
8. Teaching & Skill of Athel.	100		94
9. Teaching & Skill of Major Games	100		93
10. Physical Efficiency Test	20		18
11. Practical Note Book	20		19
12. Co-curriculum Activities	20		36
13. Morning Assembly/Rifles Drill etc.	70		67
<b>Total</b>	<b>1050</b>		<b>858</b>

Note: Errors/omissions excepted.

Failed/Passed Division \_\_\_\_\_ Division

Prepared by \_\_\_\_\_

Checked by Department \_\_\_\_\_

Date of Declaration of Result \_\_\_\_\_

Deputy Director (Examination),  
Schools & Literacy Department,  
N.W.F.P., Peshawar.

DEC 2008

*M. Sattar*  
District Controller, Peshawar

8-18

20



Serial No.

215170

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD

Name SAMAN NAZ

Roll No U680715

Fathers's Name MUAHMAD YOUNIS

Registration No 06NMA2502

Address D/O MUHAMMAD YOUNIS HOUSE NO. T-D. 1 MDH  
SIANA ABAD

Final Semester AUT-2007

Tehsil MANSEHRA

District MANSEHRA

has successfully completed BACHELOR OF EDUCATION

Programme.

The detail of passed courses are as under: (B: ED)

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 06	0513	SCHOOL ORGANIZATION	100	54
AUT- 06	0514	EVALUATION, GUIDANCE & RESEARCH	100	66
AUT- 06	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	60
AUT- 06	0651	ENGLISH	100	56
SPR- 07	0517	TEACHING OF PAKISTAN STUDIES	100	55
SPR- 07	0654	TEACHING OF ISLAMIAT	100	71
AUT- 07	0512	PERSPECTIVES OF EDUCATION	100	58
AUT- 07	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	57
AUT- 07	0655	WORKSHOP & TEACHING PRACTICE	100	66

*Attested*  
*U. N. Khan*  
Controller of Examinations

CREDITS: 6

Total Marks / Obtained 900 / 563

Result Declared on JULY 26, 2008

Percentage / Grade 63 B

Date of issue AUGUST 12, 2008

*U. N. Khan*

Disclaimer:

Controller of Examinations

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

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# DOMICILE CERTIFICATE

P-18

I declare that I am born of parents who are permanently domiciled in N.W.F. Province having been born in this Province.

I was born at MANSEHRA Tehsil MANSEHRA  
District MANSEHRA

I passed Primary Examination from G.G. Primary School Jabri Mansehra

Resident of Muhallah Siaz Abad Mansehra

Tehsil Mansehra

District Mansehra

Sd/ Saman Naz Dated 31/8/1995

Pursuance to the declaration dated \_\_\_\_\_

Filed by Saman Naz S/o D/O Muhammad Younas

Tribes Awan Section - Sub Section -

Tehsil Mansehra District Mansehra

to the effect that he had been born of parents who are permanently domiciled in N.W.F. Province having been born within it.

I have satisfied myself from personal/my own knowledge the above declaration is true and certify accordingly.

Given under my hand and the seal of Court this \_\_\_\_\_

No. 5618 Date 1995/8/31 day of Sep 1995

COUNTERSIGNED  
Muhammad  
District Magistrate  
Mansehra  
undersigned

MAGISTRATE 1ST CLASS MANSEHRA  
Sajid Raza Khan Sub-Section

Attested  
Muhammad  
Muhammad  
District Magistrate  
Mansehra

DISTRICT MAGISTRATE \_\_\_\_\_

مدرسہ عالیہ اسلامیہ میں داخلہ کے لئے درخواست لکھی جا رہی ہے۔ اس کے ساتھ ساتھ اس کے لئے 1258

*Lawee*  
Head Mistress  
Govt. Girls Primary School  
PABRI KANERDA

P-20

جہاں عالیہ اسلامیہ میں داخلہ کے لئے درخواست لکھی جا رہی ہے۔ اس کے ساتھ ساتھ اس کے لئے 1258

10-9-95

12/9/95

*[Handwritten Signature]*  
17/9/95





P-2  
ANNEXURE

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION

ORDER

Annex C

In continuation of this office Endst No. 5360-5384/ES (F)/2012 Dated Manshehra 18/05/2012 and on the acceptance of the appeal by the competent authority is hereby appointed. The following FET (Female) against the vacant post in BPS-15 @ Rs.8500-700-29500 plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect.

S#	Name	Father's Name	Address	Place of Posting
1	Samau Naz	Muhammad Younis	Mohallah Sainabad Manshehra	GGHS Kawai
2	Sadaf Riaz	Muhammad Riaz	Chakia	GGMS Bradar

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. He/she will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GP Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Manshehra)
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 registefed under relevant section of Law.

EXECUTIVE DISTRICT OFFICER  
E&S EDUCATION  
MANSHEHRA

Muhammad Asghar Khan Ismail  
District Officer

P. 22

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

(DR. AMBAR ALI KHAN)  
DISTRICT COORDINATION OFFICER  
MANSEHRA

Endst: No. 6879-85 /Estt: Apptt: PET//2011-12 Dated Mansehra the 21/5/2012  
Copy to the:-

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

EXECUTIVE DISTRICT OFFICER  
E&S EDD, MANSEHRA



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Annex D

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7619 / DEO/ 2014

Email: deofmanshrra@yahoo.com

Dated: 27/9/ / 2014

Phone & Fax: 0997-302518

To: Head Mistress

GMS Kotri

Subject:- SHOW CAUSE NOTICE  
Memo:

Show Cause notice in respect of Mst Sanam Noz PET D/O Muhammad Jounis of your school IS attached herewith. You are directed to serve the same to the teacher concerned and return one copy to this office as a token of receipt.

DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

Endst:No. 7620-23 /

Copy to the:-

1. Deputy Commissioner, Mansehra.
2. District Monitoring Unit Mansehra.
3. Sub Divisional Education Officer( Female) Manshra.
4. ADEO Circle concerned is directed to ensure the attendance by the concerned teacher.

I have received  
this letter on  
9-10-2014

Fatima  
Head Mistress  
G.G.M.S Kotri  
Mansehra

DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

Advocate  
Distt. Courts Abbottabad

OFFICE OF THE DISTRICT EDUCATION OFFICER ( FEMALE ) MANSEHRA.

No. 7620 /

Dated 27/9/ /2014

SHOW CAUSE NOTICE.

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I, Naghmana Sardar, District Education officer (Female ) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) rules, 2011, do hereby serve Show Cause Notice you Mst: Sanam Naz D/O Muhammad Younas, Mansehra as follows:

1) (I) You were illegally appointed as PET at GGHS Kawai vide defunct Executive District Education Officer (E&SE) Mansehra Endst: No. 6879-85 /Estt: apptt: PET/2011-12 dated 31.05.2012, now working at GGMS Kotri whereas you were stranger for recruitment process initiated through EATA, you never appeared in selection process as a candidate for the said post through EATA. Your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25.8.2014. More over the then EDO (E&SE) has been removed from Government Service in connection with all such bogus appointment including your made by him.

2) Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including yours defence before the inquiry committee:-

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

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

- As a result thereof, I as 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 thereof, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.
- A copy of relative page of the finding of the inquiry committee is enclosed

*Sanam Naz*  
Mst: Sanam Naz  
D/O Muhammad Younas  
PET GGMS Kotri.

*Naghmana*  
COMPETENT AUTHORITY  
District Education Officer  
(Female) Mansehra

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GOVT: GIRLS MIDDLE SCHOOL KOTHRU BATTAL (MANSEHRA)

To  
The District Education Officer  
(Female) Mansehra

Subject: SHOW CAUSE NOTICE

Dear Madam:

Kindly reference to your Memo No. 7619 dated 27.09.2014 on the subject cited above.

It is submitted that I have been appointed as a P.E.T at GGMS Kawai (Mansehra) vide Executive District Officer Elementary & Secondary Education Mansehra vide his No. 6879-85 dated 31.05.2012, purely on merit and all codal formalities had been adopted/observed by then E.D.O.

- a) Posts of P.E.T were advertised. Copy attached (Annex-I). I applied through Proper Channel on prescribed performa. Copy attached. (Annex-II) Committee was constituted for recruitment process and I appeared before the committee, EATA/Test interview was held the competent authority and I passed EATA test under Roll # 1702744 & Obtained marks 144 out of 300 Copy of EATA result is attached. (Annex-III).
- b) Merit was prepared and displayed and Appointment was made by the competent authority of Executive District Officer (Elementary & Secondary) Mansehra purely on merit so far as the charges/misconduct is concerned as indicated is concerned in your kind letter is illegal, unlawful and against the effecting and discipline rules 2011, because neither you

*Received  
Kawail  
M. Asif 23/10/14*


*Accepted  
Muhammad Arshad Khan  
Distt: Courts Abbottabad*

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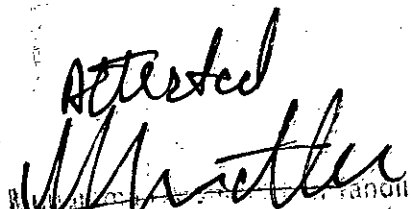
nor inquiry/officer has adopted and observed coddle formalities i.e. explanation, serving of notice and personal hearing hence I have committed no offence/omission.

- 1) I am not appointing authority who made fake and facetious order hence appoint is on merit.
- 2) No financial loss to the Govt: treasury has given by me, because I have been serving right from my appointment to date regularly and punctually being a Govt: Servant.
- 3) I have not deprived any candidate as I stood on merit list at the Serial No. 11 of P.E.T merit list.
- 4) Since I have been appointed/according to the rules and regulation and purely on merit by the competent authority i.e. Executive District Officer Educate BPS-19 and D.O (F) being in BPS-18 is not competent to impose Minor or Major penalty i.e. removal from service. If any Un lawful steps will be taken by you the rights to approach to Honourable High Court is reserved.

Thanking You



Saman Naz  
(B.A, B.Ed, JDPE regular  
course RITE Mansehra)  
P.E.T  
GCMS Kothri Battal  
Mansehra

Attested  
  
Advocate  
Old Court Amnabad



Annex E

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Saman Naz DIO Muhammad Joannis working as PET GGHS/GGMS/GHS Kotari 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, (PC: 5G B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
  - ii) Mr. Akhallaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhawa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst: Saman Naz DIO Muhammad Joannis CT/PET/FF PET GGHS/GGM GHS Kotari

*M. Ayman*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

*Attested*  
*Muhammad Arshad Khan*  
Advocate  
Dist: Courts Abbottabad

Endst: No. 1462-1471/AE-I / Estab: dated 03/07 / 2015.

Copy to the:-

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

*M. Ayman*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

11/19 P-28

To

The Director,  
Elementary & Secondary Education  
Peshawar.

Annex F

Subject: APPEAL AGAINST DISMISSAL ORDER

Dear Sir:

Kindly reference to the DEO (F) Mansehra Memo No. 1462-1471/AE-I/Estb: dated 03.03.2015 on the subject cited above.

It is submitted that I have been appointed as a P.E.T at GGMS Kotri Baital (Mansehra) vide Executive District Officer Elementary & Secondary Education Mansehra vide his No. 6879-85 dated 31.05.2012, purely on merit and all codal formalities had been adopted/observed by then E.D.O.

a) Posts of P.E.T were advertised. Copy attached (Annex-I).

Copy attached. I applied through Proper Channel on prescribed performa. Copy attached. (Annex-II) Copy attached. Committee was constituted for recruitment process and I appeared in EATA and passed the EATA test under Roll No. 1702744 scoring 144 Marks (Annex-III) Copy attached after that I appear before the Interview committee made by the competent authority merit was prepared and displayed and appointment was made by the competent authority of Executive District Officer (Elementary & Secondary) Mansehra purely on merit on acceptance of the appeal of the candidate. So far as the charges/misconduct is

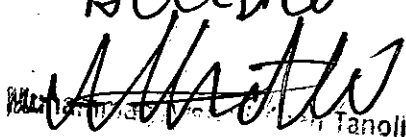
*Altered*  
*Altered*  
District Officer, Peshawar  
District Office, Peshawar  
District Office, Peshawar




concerned as indicated is concerned in your kind letter is illegal, unlawful and against the effecting and discipline rules 2011, because neither you nor inquiry officer has adopted and observed codal formalities I explanation serving of notice. Hence I have committed no offence/omission.

- 1) I am not appointing authority who made fake and facetious order hence appoint is on merit.
- 2) No financial loss to the Govt: treasury has given by me, because I have been serving right from my appointment to date regularly and punctually being a Govt: Servant.
- 3) I have not deprived any candidate as I stood on merit list at the Serial No. 11 of P.E.T merit list. (Annex-IV). Copy of Merit list is attached.
- 4) Since I have been appointed/according to the rules and regulation and purely on merit by the competent authority i.e. Executive District Officer Educate BPS-19 and D.O (F) being in BPS-18 is not competent to impose major penalty i.e. Dismissal from service. Kindly cancel/set-aside the said illegal order issued by the DEO (F) Mansehra of dismissal from service please otherwise I reserved the rights to approach the Honourable service tribunal Peshawar.

Thanking You.

Attached  
  
 Muhammad Tanoli  
 Educate  
 Dist. Council Abbottabad

  
 Saman Naz  
 (B.A, B.Ed, JDPE regular  
 course RITE Mansehra)  
 P.E.T  
 GGMS Kotri Battal (Mansehra)

# وکالت نامہ

بعدالت سر وکیل سرینوئل لال

عنوان: حسن ناز - بنام خورشید

منجانب: اسٹیٹ

نوعیت مقدمہ:

## باعت تحریر آنکہ

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

محمد ارشد زہاں تنوئی اللہ اولیہ بانی لورٹ ایبٹ آباد

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

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

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

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

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

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

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

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

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

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند ہے۔

المرقوم: 15/7/2011

بمقام: سرینوئل لال

Accepted

Sum

M. Arshad Khan Tanoli Adv  
 (Adv. Gen. AF 11)  
 دقام نوٹوشیت کچہری (ایبٹ آباد)

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

**CAMP COURT ABBOTTABAD**

**Appeal No. 826/2015**

Mst: Saman Naz , D/O Muhammad Younas, PET, GGMS Kotri Sathan Gali, R/O Mohallah Sain Abad,  
Tehsil & Mansehra.....APPELLANT

**Versus**

1. Govt of Khyber Pakhtun Khawa, through Secretary Elementary and Secondary Education, Peshawar and others.
2. Director Elementary and Secondary Education, Govt. of Khyber Pakhtun Khawa, Peshawar.
3. District Education Officer (Female) District Mansehra.

.....RESPONDENTS.

Written reply on behalf of Respondent 1 to 3.

**PRELIMINARY OBJECTIONS:**

1. That the appellant has got no cause of action to file the present appeal.
2. That the appeal is not maintainable in its present form.
3. That the appeal is time-barred and not entertain able.
4. That the appellant has not come to the tribunal with cleans hands.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appeal is based on false and mala fide hence deserves dismissal.
7. That the appellant has suppressed the original facts from this Honorable Service Tribunal, hence not entitled for any relief & the appeal is liable to be dismissed.
8. That the competent authority has dismissed the appellant in accordance with law / rules. Thereafter the appellant preferred an appeal against the said order before the appellate authority i-e Director E & SE KPK, who has converted the penalty of "Dismissal to removal"

9. The appointment of the appellant was illegal ab initio And against the law and rules, hence the authority has conducted the inquiry against the then appointing officer i-e EDO, E & SE, appointed to present appellant in which it was found that the appointed to present appellant along with the number of other teachers were made against the rules / law and the then EDO, E & SE Mansehra namely Ommer Khan Kundi was removed from Service, by the competent authority i-e chief Minister KPK under E & D rules 2011. **(Copy is attached)**

**FACTUAL OBJECTIONS:**

- 1) Para No.1 is correct to the extent that respondent No. 3 announced the post of PET in the daily "The AAJ" dated 20-5-2011, while the rest of the Para is incorrect.
- 2) Para No.2 is incorrect. She has not recorded her ETEA Test R. No but recorded marks obtained 168. She had submitted appeal in the office of for appointment through her brother. Appointment letter was received through post and was appointed at GGMS kothri Battal, and still receiving her pay. She recorded her merit list number as 09.
- 3) Further stated that appointment of appellant with other teachers namely Sadaf Riaz was illegal and against the recruitment rules and procedure, hence after proper inquiry the competent authority has dismissed both the ladies / Teachers. Copy of the inquiry report stated that both the applicants were shown as appointed on acceptance of their appeals by the EDO E & SE Mansehra. The names of both ladies were not included in the working papers, DSC meeting and minutes. There appointment orders were issued un lawfully by the EDO E & SE Mansehra without proper procedure. Only 09 candidates were approved by the DSC and 03 seats were reserved for promotion Quota. The EDO accepted the appeals and passed appointment order against the quota reserved for promotion without working paper, DSC and minutes which is against the appointments rules and procedure. The D.O Female in her written statement had clearly stated that she had not given her consent / proposals/ NOC for appointment of these PETs against the quota reserved for promotion and no such information / NOC was asked by her office. it was also observed that copy of SSC, FA certificate and BA degree of Saman Naz was not available on the record where as copy of BA degree and JDPE of Sadaf Riaz were also missing. Hence the appointment of Saman Naz and Sadaf Riaz is illegal and against the recruitment rules and procedure. **( Annexure-A )**

- 4) Para No.3 is incorrect, hence denied.
- 5) Para No.4 is incorrect, hence denied.
- 6) Para No.5 is correct.
- 7) Para No.6 is incorrect. Respondent No.3 issued show cause notice to the appellant after the finding of inquiry committee and the office of the Worthy Secretary E & SE Department Peshawar has directed the respondent No.3 to take action in the light of finding of the inquiry committee. **(Annexure-B)**
- 8) Para No.7 is incorrect. The reply of the appellant was not satisfactory for which the dismissal order was issued.
- 9) Para No.8 is incorrect. The appellant was removed from service after fulfilling the codal formalities.
- 10) The appeal of the appellant was dismissed by the appellate authority on the following grounds:
- I. Her name was included in the Merit list at S. No. 11. Her name was included in the working papers of the DSC minutes of only nine (09) candidates against the available 09 seats. She was appointed through a single / individual order.
  - II. Appeal may be rejected with the remarks that there were 09 vacancies reserved for initial recruitment for fresh candidates and in accordance with the merit list her name was stood at S. No. 11. Hence she was not entitled to appointment. **(Annexure-C)**

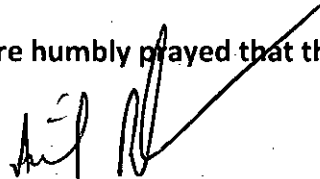
**GROUND:-**

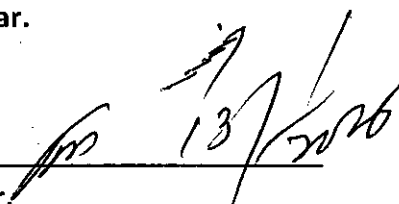
- a. Para No. a is incorrect. The appellant was appointed out of the merit No meeting of DSC was held to decide the appeal as mentioned in Para No.3.
- b. Para No. b is incorrect, hence denied. The appellant was appointed out of laid down procedure and criteria.


- c. Para No. c is incorrect, hence denied.
- d. Para No. d is incorrect, hence denied. Appointment of the appellant was against the law and rules.
- e. Para No. e is correct to the extent of removal of Ummer Khan Kundi the then EDO by the Competent authority however the appellant was dismissed after fulfilling all the codal formalities.
- f. Para No. f is incorrect. The appellant was dismissed from service after fulfilling the codal formalities.
- g. Para No. g is incorrect, hence denied.
- h. Para No. h is incorrect. There were only 09 vacancies available for fresh appointment and in accordance with the Merit list her name was stood at S. No 11. Hence she was not entitled too appointment.
- i. Para No. i is correct to the extent of removal of Ummer Khan Kundi the then EDO by the Competent authority however the appellant was dismissed after fulfilling all the codal formalities.
- j. Legal, may be treated as per law.

**Prayers:**

It is therefore humbly prayed that the instant appeal may kindly be dismissed.

Respondent No. 1  \_\_\_\_\_  
 Secretary E&SE, KPK, Peshawar.

Respondent No.2  \_\_\_\_\_  
 Director E&SE, KPK, Peshawar.

Respondent No. 3  \_\_\_\_\_  
 District Education Officer  
 (Female) Mansehra.

**AFFIDAVIT**

I, Mr. Sakinullah, ADEO(Litigation), District Education Officer (F) Mansehra, do, hereby solemnly affirm and declared that the contents of reply in the instant Appeal No.826-A/2015 titled case Mst: Saman Naz, PET Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Court.



DEPONENT

**BEFORE THE KPK SERVICE TRIBUNAL, CAMP COURT ABBOTTABAD**

Mst: Saman Naz, PET, .....APPELLANT

**VERSUS**

Govt. of Khyber Pakhtun Khawa, through Secretary Education,  
Peshawar etc.....Respondents

**SERVICE APPEAL**


**REAPPLICATION IN RESPECT OF SUSPENSION OF OPORTION OF IMPUGNED  
ORDER DATED 03-03-2015.**

**RESPECTFULLY SHEWETH:**

1. The replication may please be considered as integral part of written reply.
2. Para no. 2 is incorrect, hence denied.
3. Para no. 3 in incorrect, hence denied.
4. Para No. 4 is incorrect. The applicant was not entitled for the said post.
5. Para No. 5 is incorrect, hence denied. The appointment of the applicant was against the prescribed rules / policy.
6. The ingredients of suspension are not fulfilled. The dismissal of the appellant was made in accordance with the law by the competent authority.

It is therefore most humbly prayed that the application may graciously be dismissed with cost.


Respondent No. 1 to 3 through  
District Education Officer  
(Female) Mansehra.

  
\_\_\_\_\_



**AFFIDAVIT**

I, Mr. Sakinullah, ADEO (Litigation), District Education Officer (F) Mansehra, do, hereby solemnly affirm and declared that the contents of replication in the instant Appeal No.826-A/2015 titled case Mst: Saman Naz, PET, Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Court.



DEPONENT



8

**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.

i. Syed Hidayat Jan, (PCS SG BS-20), Special Secretary, Agricultural Department, Khyber Pakhtunkhwa Peshawar (now Secretary Zakat, Usher, and Social Welfare Department.

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

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

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

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

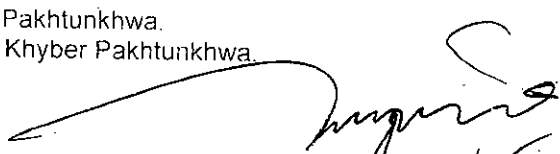
6. **NOW, THEREFORE**, in exercise of the powers conferred under section 14 of Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of "**Removal from service**" upon Mr. Umar Khan Ex-Executive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

**SECRETARY**

**Endst: of Even No. & Date:**

Copy forwarded to the: -

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

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

## INTRODUCTION:

DURING THE YEAR 2012 AND 13 IN OFFICE OF THE EDO, ELEMENTARY AND SECONDARY EDUCATION, DISTRICT MANSEHRA APPOINTMENTS OF FEMALE TEACHERS IN VARIOUS CADRES WERE CARRIED OUT PURSUANT TO AN ADVERTISEMENT PUBLISHED IN DAILY AAJ DATED: 20-05-2011, WHEREIN CERTAIN IRREGULARITIES/ILLEGALITIES IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE WERE NOTED, THEREBY RESULTING IN BREACH OF MERIT/ILLEGAL PRACTICE AND IGNORING THE RIGHTFUL CANDIDATES.

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

- i. SAYED HIDAYAT JAN (PCS SG BS-20), Special Secretary, Agriculture Department, Khyber Pakhtunkhwa, Peshawar.
- ii. MUHAMMAD KHALAQ BAIG, Principal (BS-20) R.I.T.E (M), Haripur.

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

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

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

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

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

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

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

3. **Venue of Enquiry:**

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

1. **PROCEEDINGS:**

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

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

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

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

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

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

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

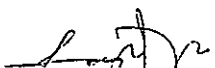
The Education Department vide their letter No: SO(S/M)E&SED/4-17/2013/Umer Khan dated: 02-Sept. 2013 intimated that a summary for rectification of the designation of the accused in the charge sheet /statement of allegation was moved to the Chief Minister, Khyber Pakhtunkhwa/Competent Authority. Similarly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

## **FACTS**

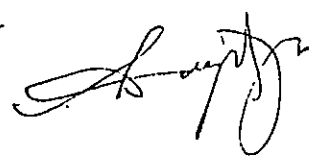
### **REPLIES TO THE CHARGE SHEET:**

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

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

O. 

3	Madeeha Yaqoob D/O Mohammad Yaqoob	AT	She did not know her EATA test roll number but recorded marks obtained as 135. She has denied regarding submission of any <b>appeal</b> for appointment, but received her appointment order through post. Appointed at GGMS Sokal and later at GGMS Kamalban. She has not been receiving her pay for the last one year. Her service book was prepared by Shah jahan clerk by receiving rupees 1000/- The Service Book is kept by him. She recorded her merit list number as 27.
4	Saman Naz D/O Mohammad Younis	PET ✓	She has not recorded her EATA test roll number but recorded marks obtained 168. She had submitted <b>appeal</b> in the office for appointment through her brother. Appointment letter was received through post and was appointed at GGMS Kothri ( Battal) and still receiving her pay. She recorded her merit list number as 09.
5	Sadaf Riaz D/O Mohammad Riaz	PET	She did not remember her EATA test roll number, claimed marks as 156. She admitted of sending <b>appeal</b> for appointment in the office. Appointment letter was received through post and her father also collected same from the office. Appointed at GGMS Baradr Darband, has not been receiving salary so far and the service book has not been prepared either. Claims to be at merit list number 11.
6	Maimoonah D/O Haq Nawaz	CT	Recorded EATA test roll number as 1700558 with marks obtained 184. Admitted submission of her <b>appeal</b> through her father who has also received her appointment order and that all process has been done by her father. Appointed at GGMS Sokal later on at GGMS Kothri, receiving her pay. Claimed to be at merit list number 03.
7	Aşma Zeb D/O Anwar Zeb	DM	Recorded to be at serial number 04; Did not remember EATA test roll number but marks obtained as 160. Appointed on regular basis and received appointment order by hand. Receiving her pay regularly and appointed at GGHS Ganool. Presently working at GGHS Kewai

ant, 

**APPOINTMENT ORDERS OF PETS**

47. As per Government of Khyber Pakhtunkhwa E&SE Department notification number SO(PE)4-5/SSRC/VOL -III Dated 18.12.2011, regarding service recruitment rules of teaching cadres from BPS-7 to BPS-16, the minimum qualification and experience for initial recruitment of PET (BPS-9) was as follows:

Nomenclature	Minimum Qualification and Experience for initial Appointment or by transfer	Age limit	Method of recruitment
PET (BPS-9)	Bachelor Degree from a recognized University with one year Junior Diploma in Physical Education Course or Army equivalency other equivalent qualification	18-35 years	a. Twenty % by promotion on the basis of seniority cum fitness from amongst the Primary School Teachers of the concerned Districts with at least five years service as such and having qualification mentioned in column 3 and b. 80% by initial recruitment.

48. Departmental Selection Committee in its Meeting held on 14-5-2012 regarding recruitment of CT, PETs held under the Chairmanship of Mr. Umer Khan EDO E&SE Mansehra approved 9 PETs (Female) from S.No. 1 to 9 from the merit list of 25 candidates for appointment. Minutes were Endorsed: vide No. 5207-12 /Estab/Apptt: 2012 dated 15-05-2012. (Annex- XLIV).

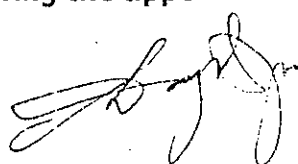
49. Appointment orders Of 9 Female candidates of PETs were issued under the signature of Mr. Umer Khan Kundi EDO E&SE Mansehra vide No. 5360-5384/Estt: (F) Apptt: PET (F) /2011-12 dated: 18-05-2012. (Annex- XLV).

50. **IRREGULARITIES FOUND IN THE APPOINTMENT ORDERS OF PETS**

SERIAL NO. IN THE MERIT LIST OF ATs	NAME & FATHER NAMES	APPOINTMENT ORDER NO/Endstt: No. AND DATE/PLACE OF POSTING	Facts	Remarks
10	2-Sadaf Riaz D/O Muhammad Riaz	6879-85 /Estt: Apptt: PET/2011-12- dated 31-05-2012 at GGHS Kawai in (BPS-15)	Both the applicants were shown as appointed on acceptance of their appeals by the EDO E&SE Mansehra.  The names of both ladies were not included in the working paper, DSC meeting and minutes. Their	Appointment of Saman Naz and Sadaf Riaz is illegal and against the recruitment rules and procedure.

11	1-Saman Naz D/O Mohammad Younas	6879-85 /Estt: Apptt: PET/2011- 12- dated 31-05- 2012 at GGMS Bradar in (BPS- 15)	appointment order was issued unlawfully by the EDO E&SE Mansehra with out proper procedure. Only 09 candidates were approved by the D.O and 03 seats were reserved for promotion quota. The EDO accepted the appeals and passed appointment order against the quota reserved for promotion with out working paper, DSC and minutes which is against the appointment rules and procedure. The D.O Female in her written statement had clearly stated that she had not given her consent /proposal /NOC for appointment of these PETS against the quota reserved for promotion and no such information/NOC was asked by her office. It was also observed that copy of SSC, FA Certificate and BA Degree of saman Naz was not available on the record whereas copy of BA degree and JDPE of Sadaf Riaz were also missing. <b>(Annex-XLVI)</b>	
	<b>Rabia Aziz D/O Muhammad Aziz</b>	6886-09 /Estt: Apptt:PST/2011- 12 dated Mansehra 31-05-2012 appointed as PET in BPS-09 GGMS Kotri	Appointed as acceptance of appeal by the EDO Mr. Umer Khan her-name was not in the merit list of PETS. Copy of appeal working paper minutes and approval of DSC was not available in the office record. Proper procedure was not followed. <b>(Annex-XLVII)</b>	Appointment is illegal and against the recruitment rules and procedure.

51. It was also noticed that the hand written appeal of Sadaf Riaz addressed to EDO E&SE Mansehra was received in his office on **25-09-2012** on Dairy No. 5199 marked to D.O (F) under the Initials of EDO E&SE Mansehra but without any further process the same was accepted by the EDO E&SE Mansehra. It is very strange that **the appeal was received to the EDO E&SE Mansehra on 25-09-2012 whereas the appointment was issued on 31-05-2012 i.e four months prior to the appeal. This shows the illegal and irregular activities during the appointment process. (Annex-XLVIII)**






GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No.SO(S/M) E&SED/4-17/2013/Umar Khan EDO BS-19  
Dated Peshawar the August 25, 2014

B

14

To.

- i. The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.
- ii. District Education Officer (Female)  
Mansehra.

*Note: original report  
filed in case of  
pending document  
BEC*

Subject: - ENQUIRY REGARDING APPOINTMENT/ GUIDANCE.

I am directed to refer to your letter No.3076 dated 16-07-2014 on the subject noted above and to forward herewith a copy of inquiry report conducted by inquiry committee comprising the following officers.

- i. Syed Hidayat Jan, (PCS SG BS-20) Ex-Special Secretary Agriculture Department  
Khyber Pakhtunkhwa Peshawar.
- ii. Mr. Khalaq Baig, Principal (BS-20) RITE Male Haripur.

2. It is requested that further action may be taken in the light of findings of the inquiry committee after issuance of show cause notices to the female teachers who were illegally appointed.

Encl: As Above:

*Mujeeb-ur-Rehman*  
(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)



15

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

**NOTIFICATION.**

WHEREAS, Mst Saman Naz, PET at Government Girls Middle School Kothri District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1462-71 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

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

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

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

1. Her name was included in the Merit list at S.No. 11. Her name was not included in the working papers of the DSC minutes of only nine (09) candidates against the available 09 seats. She was appointed through a single/individual order.
2. Appeal may be rejected with the remarks that there were 09 vacancies reserved for initial recruitment for fresh candidates and in accordance with the merit list her name was stood at Sr.No.11. Hence she was not entitled to appointment.

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. 1462-71 dated 03/03/2015 is hereby converted into removal from service.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4266-70 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

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

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

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

RP-54

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رسید

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24/8

رجسٹری یا پیسہ بچتے والے کو پشت پر دیئے گئے پتہ پر واپس بھیجا جائے۔

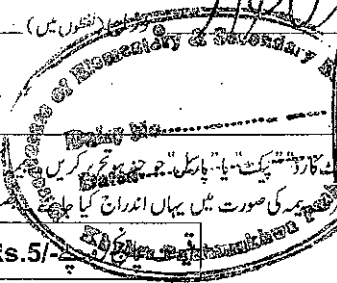
نمبر  
برائے (نام) *ایک رجسٹری*

رجسٹری کے لئے  
پائی۔

گرام

(تفصیل)

تاریخ تقسیم



یہاں چکی کے دستخط  
بیمہ کی مابین  
مکتوب کے دستخط  
کارڈ ٹیکٹ یا پائلٹ جہز پر تحریر کریں  
یہاں چکی کے دستخط  
بیمہ کی صورت میں یہاں اندراج کیا جائے  
مکتوب کے دستخط  
بیمہ کی صورت میں لفظ "بیمہ" پہلے تحریر کریں۔  
مکتوب کے دستخط  
بیمہ کی صورت میں لفظ "بیمہ" پہلے تحریر کریں۔

Rs. 5/-

P-31

# ACKNOWLEDGEMENT DUE CARD



عشقم ناز دختر محمد رفیع

سکون عمر H-121 محلہ سائیں اکبر

Main سٹریٹ سالہ

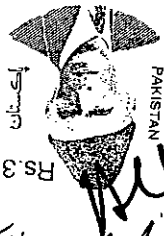
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ڈاکخانہ ۲۰۵ سالہ

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پوسٹ کوڈ

(پوسٹ کوڈ لکھنا ضروری ہے)



RS.3

*[Handwritten signature]*

Post Office, Feroz Khan Road, Feroz Khan Road, Feroz Khan Road  
Dist: Feroz Khan Road