

**BEFORE THE HONOURABLE KHYBERPAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 2510/2023

Abdus Samad, Junior Clerk, GHSS Lahore, District Swabi.....Appellant

VERSUS

The Secretary E&SE Department Khyber Pakhtunkhwa & others.....Respondents

INDEX

S/#	Description of document	Annexure	Pages No.
1	Joint Parawise Comments along with affidavit		1-5
2	Copy of the appointment order dated 16-07-2012.	A	6
3	Copy of the notification dated 31-12-2018.	B	7
4	Copies of the letter dated 11-02-2022 and order dated 04-08-2021	C & D	8-9
5	Copy of the office order dated 12-10-2021.	E	10
6	Copies of the letters dated 18-10-2021 & 25-10-2021.	F & G	11-12
7	Copies of the notification dated 06-10-2023, letters dated 22-11-2023 and 05-12-2023	H, I & J	13-15
7	Copy of the office order dated 22-02-2022.	K	16
8	Authority letter.		17


(Samina Altaf)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

21-2-2024

①

BEFORE THE HONOURABLE KHYBERPAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 2510/2023

Abdus Samad, Junior Clerk, GHSS Lahore, District Swabi.....Appellant

VERSUS

The Secretary E&SE Department Khyber Pakhtunkhwa & others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-3 & 5.

Respectfully Sheweth :-

The Respondents submit as under: -

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11268

Dated 21-02-2024

PRELIMINARY OBJECTIONS

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 3 That the appellant has not come to this Honorable Tribunal with clean hands.
- 4 That the appeal is barred by the relevant provision of law of limitation Act, 1908
- 5 That the appeal in hand is bad for mis-joinder and non-joinder of the necessary parties to the titled appeal.
- 6 That the titled case is based on mala fide intentions.
- 7 That as per letter No. 1456 dated 11-02-2022, the appellant has not reported for duty against the Junior Clerk post to the Respondent No. 5 till date.
- 8 That the Notification dated 06-10-2023 whereby, the appellant has shown himself as adjusted for the purpose of pay w.e.f 01-12-2018 to 02-02-2021 & 01-12-2021 to 28-02-2022 has been declared as fake & bogus in response to the letter dated 22-11-2023 vide letter dated 05-12-2023 by the Respondent No. 1.
- 9 That as per record, the period w.e.f 01-12-2018 to 20-01-2021 has already been treated as leave without pay/EOL vide letter dated 04-08-2021 as the appellant has not performed his official duty during the said period in the Respondent Department
- 10 That the appellant is a habitual duty absconder against the Junior Clerk post as evident from so many complaints filed by the complainants against him.
- 11 That formal show cause Notice has been served upon the appellant by the competent authority on 25-09-2016.

2

12 That the appeal in hand is not maintainable under the Law & Rules.

ON FACTS

- 1) That Para-1 pertain to the service record of the appellant against the Junior Clerk post inducted under the deceased sons quota vide appointment order dated 16-07-2012 in BPS-07 *attached as Annex-A*.
- 2) That Para-2 is incorrect on the grounds that as per Notification dated 31-12-2018 of the District Education Officer (Female) Swabi that the appellant has been found guilty of mis-conduct & inefficiency with regard to the performance of his official duty on female side which was resulted in the withholding of one annual increment along with his transfer/posting to the office of the District Education Officer (Male) Swabi on the grounds of being not fit on female side in view of his conduct *attached as Annex-B*.
- 3) That Para-3 is also incorrect on the ground that as per report submitted by the Respondent No. 3 vide letter dated 11-02-2022 to the Director E&SE Khyber Pakhtunkhwa Peshawar with reference to para-3 which says "*that once again his services were placed at the disposal of this office { District Education Officer (Male) Swabi } while the absent period w.e.f 01-12-2018 to 28-02-2021 was treated as EOL/leave without pay vide order dated 04-08-2021 (Attached as Annex-C & D)*."
- 4) That Para-4 is correct that vide order dated 09-02-2021 & engineered, whereby, the appellant has shown as posted/ at the disposal of the Principal GGHSS Kalu Khan District Swabi which was shown to have been withdrawn vide order dated 12-10-2021 engineered by the appellant on mala fide. (*Annex-E*).

However, it is further submitted that vide letter dated 18-10-2021, the District Education Officer (Male) Swabi has forwarded the said withdrawal order dated 12-10-2021 to the Director E&SE Department for verification *attached as Annex-F* which has been disowned vide letter dated 25-10-2021 by the Respondent No. 2 *attached as Annex-G*.

Similarly, the appellant has also shown himself to have been adjusted as Junior Clerk in BPS-11 at GHSS Himlate District Swabi for the adjustment for the purpose of pay w.e.f 01-12-2018 to 02-02-2021 & 01-12-2021 to 28-02-2022 *attached as Annex H* which was also forwarded by the Respondent No. 3 vide her office letter dated 22-11-2023 attached *as Annex-I* & in response to the said letter, the same order dated 06-10-2023 was also disowned by the Respondent No. 1 vide letter dated 05-12-2023 *attached as Annex-J* showing that the whole service record of the appellant is fake & bogus & even engineered by the appellant on mala fide.

- 3
- 5) That Para-5 is correct to the extent of the Notification 31-12-2018, whereby, one annual increment was withheld, furthermore, vide Notification dated 09-02-2021, the services of the appellant were placed at the disposal of respondent No. 2 who vide order dated 22-02-2022, the services of the appellant was placed at the Disposal of the respondent No. 3 who further posted the appellant at GHS Lahore Swabi against the Junior Clerk post under the Law & Rules *attached as K*.
 - 6) That Para-6 is correct that vide order dated 11-08-2021, the absence from duty period w.e.f 01-02-2018 to 28-02-2021 was treated as EOL under the Rules as explained in the forgoing paras by the replying Respondents.
 - 7) That Para-7 is incorrect as no appeal has been filed by the appellant to the appellate authority against the afore said orders till date.
 - 8) That Para-8 is correct to the extent of filing of Departmental appeal dated 24-08-2023 which was disposed of in terms of the fore made submissions made by the Department, therefore, the appeal in hand is liable to be rejected on following grounds inter alia:-

ON GROUNDS

- A. *Incorrect & not admitted.* The stand of the appellant is illegal & liable to be rejected.
- B. *Incorrect & not admitted.* The appellant has been found duty absconder against the Junior Clerk post for the said period by the competent authority, hence, the said period mentioned in Para-06 was treated as period leave without pay/EOL under the relevant provision of revised leave Rules-1981 in favor of the appellant.
- C. *Incorrect & not admitted.* The appellant is not entitled for the grant of salaries for the period w.e.f 01-02-2018 to 28-02-2021 on the analogy of no duty & no pay by the Department
- D. *Incorrect & not admitted.* The act of Department with regard to the non-grant of salaries for the period as cited above is legal & liable to be maintained.
- E. *Incorrect & not admitted.* The plea of the appellant is illegal & liable to be rejected in the above cited terms.
- F. *Incorrect & not admitted* the appellant has been treated as per Law & Rules in the titled matter by the Department.

G. Incorrect & not admitted . the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974, hence, the appeal in hand is liable to be rejected with further submissions to grant leave for submission additional grounds, record & case law at the time of arguments on the date fixed please.

PRAYER.

Therefore, in view of the above made submissions, it is humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favor of the Respondent Department in the interest of justice please.

Dated ___/ ___/2024.

Samina Altaf
(SAMINA ALTAF)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 2-~~385~~)

[Redacted signature area]

**BEFORE THE HONOURABLE KHYBERPAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 2510/2023

Abdus Samad, Junior Clerk GHSS Lahor District Swabi.....Appellant

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The Secretary E&SE Department Khyber Pakhtunkhwa & others.....Respondents

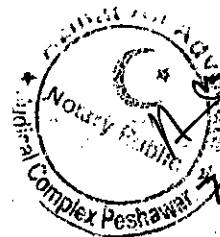
AFFIDAVIT

I, Samina Altaf, Director E&SE Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.

Samina Altaf
**(SAMINA ALTAF)
DIRECTOR**

**E&SE Department Khyber
Pakhtunkhwa, Peshawar.**

ATTESTED



21-02-2024

(6) (6) (17)

Annexure - "A"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S E) SWABI.
APPOINTMENT OF JUNIOR CLERKS.

Consequent upon the recommendations of the Departmental Selection Committee in its meeting held on 09.07.2012 the competent authority is pleased to appoint the following candidates under deceased employees sons 100% quota as Junior Clerks in BPS-7 (Rs.5800-320-15400) plus usual allowances as admissible according to the rules and further on the given terms and conditions from the date of their taking over charge and will be governed under Civil servants act, 1973, amended K.P.K Act 2005 with out pension and gratuity . Consequent to their appointment they are posted at the places mentioned against their names in the best interest of public service.

S#	Name	Father's Name	Home Address	Station where appointed
1	Fayaz Mohammad	Zarshad Ullah	VPO, KSK (Swabi)	GGHS Rafiq Abed (Swabi)
2	Faiz Ali	Kamal Khan	VPO, Yar Hussain (Swabi)	GHSS Gohar Abad Ismaila Swabi
3	Muzahir	Pervaiz Khan	VPO Salim Khan	GGHSS Topi (Swabi)
4	Abdus Samad	Abdul Qalooos	VPO Yaqubi (Swabi)	GGHSS Lohar

Terms and Conditions:-

1. These appointments are purely temporary and liable to termination without assigning any reason and without any prior notice.
2. They will have to produce Health and Age Certificate from the Medical Superintendent DHQ Hospital Swabi before taking over charge.
3. They should not be handed over charge if their age is below 18 or above 30.
4. They must take over charge of the post within 14 days; otherwise the appointment will automatically be stood cancelled
5. All the original academic/professional certificates/degrees should be verified from the concerned Board/University by the concerned Drawing Disbursing Officer. If any discrepancy was found at any stage the case may be started under the rules and legal/judicial action will be initiated.
6. Verification of documents should be made departmentally before draw of their pay and the concerned Head of schools/Institutions should send a certificate on the following pattern to this office "Certified that I have personally verified the original Certificates/Degrees from the concerned Board/University in respect of Mr _____ S/O _____ and found correct who has been appointed against Junior Clerk post at _____
7. Head of the concerned institution should check all the documents including domicile certificates of the candidates concerned before taking over charge.
8. After completion of verification process and subject to the provision of O.K certificate required in para-6 above, a proper order will be issued by this office for release of their pay against the posts occupied by them.
9. In case of resignation they will have to submit one month prior notice, otherwise their one month pay will be forfeited to the Government. After tendering resignation, they will not leave their job until the acceptance of their resignation by the competent authority nor shall they be granted any leave.
10. They will be governed by the service rules framed by the Government from time to time.
11. No TA/DA etc is allowed to any one.
12. Charge reports should be submitted to all concerned.

(ABDUS SALAM)
EXECUTIVE DISTRICT OFFICER
(ELEM.&SECOND:EDU)SWABI

Endst:No. 4313-6 J.Clerks Appointment/Dated Swabi the 16/17 2012.

Copy of the above is forwarded for information and necessary action to the:-

1. PS to Honourable Minister for Elementary & Secondary Education Govt: of KPK, Peshawar.
2. Secretary to Govt:of KPK Elementary & Secondary Education Department, Peshawar.
3. Director Elementary & Secondary Education KPK, Peshawar.
4. District Coordination Officer, Swabi.
5. All Members of Departmental Selection Committee.
6. District Accounts Officer, Swabi. (7) Heads of the concerned Institutions.
8. ADO (B&A/Estab:) Local Office. (9) Superintendents local office.
10. Candidates concerned.

Attested.
P. Juss

Handwritten signature and stamp

EXECUTIVE DISTRICT OFFICER
(ELEM.&SECOND:EDU)SWABI

Signature "63" (7) (16)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT SWABI

PH No: 0938-200330

Notification:

1. WHEREAS Mr. Abdus Samad Junior Clerk of GGISS Lahor, District Swabi (Accused) was proceeded under the Khyber Pakhtunkhwa Govt Servants (Efficiency & Discipline) Rules, 2011, for the charges of misconduct, negligence, and inefficiency

2. AND WHEREAS the accused Mr. Abdus Samad have been relieved by the concerned school on 05-10-2018 due to the charges of misconduct, inefficiency and corruption vide Principal GGISS Lahor No: 57 Dated 05-10-2018.

3. AND WHEREAS a regular enquiry has been conducted by the enquiry officer Sub-Divisional Educational Officer Female Swabi against the accused constituted vide DFO Female Office Swabi.

4. AND WHEREAS the enquiry committee after having examined the charges, evidence on record and explanation of the accused, submitted their report.

5. AND WHEREAS the Competent Authority (District Education Officer (Female) Swabi), after having considered the charges, evidences on record, explanation of the accused Mr. Abdus Samad Junior Clerk of GGISS Lahor, and recommendation of the enquiry, have been proved.

6. NOW, THEREFORE, in exercise of the powers conferred under Rule-14 of Khyber Pakhtunkhwa Govt Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (District Education Officer (Female) Swabi) is pleased to impose minor penalty of "Withholding of One increments for One year" upon Mr. Abdus Samad Junior Clerk of GGISS Lahor (District Swabi), with immediate effect.

7. Consequent upon above, Mr. Abdus Samad Junior Clerk of GGISS Lahor Swabi is hereby relieved today on 31-12-2018 and directed to report to Directorate of E&SE Peshawar for further adjustment being not fit for service at female side.
Note: Necessary entry should be made in her original service book.

(Rehana Yasmeen)
District Education Officer,
(Female) Swabi

Dated: 31-12-2018

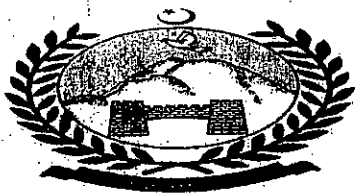
Indst: No. 2536/20 DA-11/Disciplinary action/

1. Honorable Director E&SE Peshawar with the request to adjust him at male side being reported and found involved in several ambiguous cases,
2. Deputy Commissioner Swabi.
3. District Accounts Officer Swabi.
4. District Monitoring Officer Swabi.
5. Principal GGISS Lahor, District Swabi.
6. Officials concerned.

Approved,
P. Javed

by [Signature]

[Signature]
District Education Officer,
(Female) Swabi
21/12/18



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) SWABI

No 1456 DATED 11/02 /2022

To

The Director
E&SE Khyber Pakhtunkhwa Peshawar.

Subject: **SERVICE STATUS OF ABSUS SAMAD JUNIOR CLERK.**

Memo:

Reference with transfer application of above named official for adjustment at GHS Lahor Swabi. Detail report/comments regarding the subject case is submitted as under:

- ✓ 1) That the services of Mr. Abdus Samad Junior Clerk were place at the disposal of this Office vide your good Office E/No. 7114-19/Dated 09-02-2021 (copy annexed as A).
- 2) That the official concern not reported for duty and was under inquiry and then adjusted back in female side twice.
- 3) That once again his services were placed at the disposal of this Office while absent period wef 1.12.2018 to 28.2.2021 was treated as EOL without pay vide your good Office E/No. 5408-13/Dated 04-8-2021. (annexed as B).
- 4) That in the light of above order, the DEO Female was requested for provision of service documents/history of service and present status of the said official vide this Office E/No. 6911/Dated 21-8-2021 but no report received till date (annexed as C).
- 5) That meanwhile his placement order as mentioned in para No. 3 was withdrawn vide your good Office E/No. 438-45/Dated 12-10-2021 (annexed as D).
- 6) That then the DEO Female Swabi was directed to issue show-cause notice to him and remove him from service vide your good Office E/No. 3397/Dated 25.10.2021 (annexed as E).
- 7) That now the official concern submitted an application for adjustment at GHS Lahor Swabi against the vacant post. (annexed as F).

It is pertinent to mention that he neither reported for duty at this Office nor submitted arrival in this regard; hence report is submitted for perusal and further necessary action please.

DISTRICT EDUCATION OFFICER
(MALE) SWABI

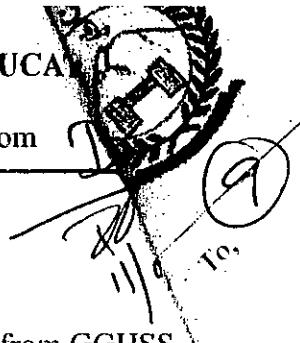
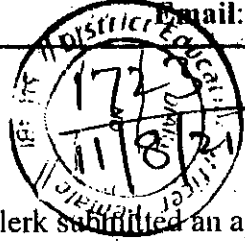
Copy of even No & date is forwarded to the:

1. DEO Female Swabi.
2. Abdus Samad Junior Clerk.

DISTRICT EDUCATION OFFICER
(MALE) SWABI

1457-58
Attested
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11/2



NOTIFICATION

1. **WHEREAS**, Mr. Abdus Samad Junior Clerk submitted an application for transfer from GGHSS Lahor Swabi to GGHS Himlit Swabi on 12/01/2021.
2. **WHEREAS**, the Services of Mr. Abdus Samad Junior Clerk were placed at the disposal of the DEO (Male) Swabi vide this Office Endst: No.7114-19 dated 9/2/2021.
3. **WHEREAS**, Mr. Abdus Samad J/C again adjusted at GGHS Malik Abad Swabi and GGHS Himlit Swabi vide this office Endst: No.2222-26 dated 8/4/2021.
4. **WHEREAS**, the DEO (F) Swabi has submitted a letter for verification of the Office orders of Mr. Abdus Samad J/C having the same Endst: No. i.e 2222-26 dated 8/4/2021.
5. **WHEREAS**, an inquiry has been conducted against Mr. Abdus Samad J/C through Mr. Adalat Khan Dy. Director (F&A) and Mr. Muhammad Gulzar Assistant Director Litigation-I local Directorate vides Notification No.7810-13 dated 2/6/2021 in the light of the letter of DEO (F) Swabi.
6. **WHEREAS**, the inquiry committee has submitted detail inquiry report through dairy No.905 dated 28/07/2021 alongwith clear cut recommendations.
7. **Now therefore**, the competent authority, the Director E&SE Khyber Pakhtunkhwa Peshawar has decided that the services of Mr. Abdus Samad J/C is hereby placed at the disposal of DEO (M) Swabi and his absent period w.e.f 1/12/2018 to 28/02/2021 (27 months) is hereby treated as leave without pay in the light of the recommendations of the inquiry report.

Director

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 5408-13 /F.No. A-23/MS/Appeal/Swabi/A. Samad Dated 4/08/2021.

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

- 1- District Education Officer (Male) Swabi.
- 2- District Education Officer (Female) Swabi.
- 3- District Accounts Officer concerned.
- 4- Principal concerned..
- 5- Appellant concerned.
- 6- PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
- 7- Master File.

*Attested
Director*

[Signature]
Deputy Director (F&A)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar



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

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

9
10
DA-III

2480
16/10/21

OFFICE ORDER

As recommended by Minister E&SE Khyber Pakhtunkhwa No nil dated 31/08/2021, the Notification/speaking order in r/o Mr. Abdus Samad Junior Clerk GGHSS Kalu Khan Swabi (under Disposal to DEO Male Swabi), issued vide this Office under Endst: No:5408-13 dated 04/08/2021 is here by **Withdrawn**.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.


Endst: No. 438-45 /A-23/MS/Appeal/Swabi/A.Samad

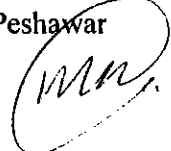
Dated Peshawar the 12/10/2021.

Copy of the above is forwarded to the: -

1. District Education Officer (Female) Swabi
2. District Education Officer (Male) Swabi.
3. District Account Officer concerned.
4. Principal/HM Concerned.
5. Official concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File

Attested.
Linnora


Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar





OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT SWABI
PH#0938-280339
NO. 3094 /Dated 18/10/2021

To,

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject: - VERIFICATION OF ADJUSTMENT ORDER OF MR. ABDUS SAMAD JUNIOR CLERK

Memo: -

Enclosed please find herewith the adjustment order in respect of Mr. Abdus Samad

Junior Clerk of GGHS.Kalu Khan issued vide your Endst. No. 438-45/A-3/MS/ Appeal/Swabi/A.

Samad Dated Peshawar the 12.10.2021 is sent for verification and returned to this office for

further procedure please.

Encl: Photo copy of adjustment order.

*Attested
E. J. J. J.*

18/10/2021
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI.



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

No 3397 / A-23/MS/Appeal/Swabi/A.Samad j/c

Dated Peshawar the 25/10 /2021

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

12

To

The District Education Officer
(Female) Swabi

Subject: **VERIFICATION OF ADJUSTMENT ORDER OF MR. ABDUS SAMAD
JUNIOR CLERK.**

Memo:

I am directed to refer to your letter No.3094 dated 18.10.2021 on the subject cited above and to direct you to issue show cause Notice to Mr.Abdus samad J/C and remove him from service after observing all codal formalities please.

[Signature]
Deputy Director (F&A)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. _____/

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Deputy Director (F&A)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION
DEPARTMENT

V3
DA-111
11/10/23

2478
11/10/23

Peshawar The October 6th, 2023

NOTIFICATION

No. AO/E&SE/6-27/Pay Adjustment/Samad/Swabi: Consequent upon the approval of the Competent Authority, is please to adjust Mr. Abdus Samad Junior Clerk (BPS-11) GHSS Lahor Swabi at GGHSS Himlate District Swabi, against the vacant post of Junior Clerk (BPS-11) for the purpose of pay w.e.f 01/12/2018 to 02/02/2021 and 01/12/2021 to 28/02/2022, in the best interest of public service.

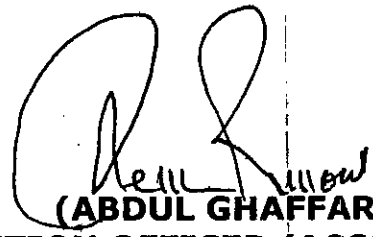
SECRETARY
Govt: of Khyber Pakhtunkhwa
Elementary and Secondary Edu: Department

Endst: No & Date Even

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer(Male/Female) Swabi.
3. District Accounts Officer Swabi.
4. Principal Concerned
5. Appellant Concerned.
6. P.A, to Director Elementary & Secondary Education, Local Directorate, Peshawar.

Attended
P. imra


(ABDUL GHAFFAR)
SECTION OFFICER (ACCOUNTS)



14 46

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

(Office phone Fax No 0938-280339, emisfswabi@yahoo.com)

No 356 / Dated 22 / 11 / 2023

To

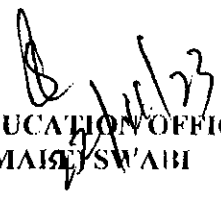
The Secretary,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject: - VERIFICATION OF ADJUSTMENT ORDER

Memo: -

Enclosed please find herewith copy of Notification issued vide your office No. AO/E&SE/6-27/pay adjustment/samad/swabi in respect of Mr. Abdus Samad Junior Clerk BPS-11 for adjustment for the purpose of pay is hereby submitted for verification/authentication please.


Encls: As Above


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst: No 357 /

Copy of the above is forwarded to:

1. Director (E&SE) KPK Peshawar for information.
2. Personal File.


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Attested


Most Immediate



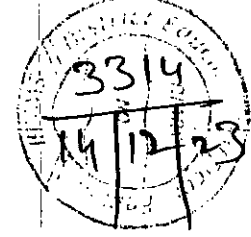
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.

No.SO(Accounts)/E&SED/ Abdus Samad JC./GGHSS Lahor Swabi
Dated Peshawar, the 05-12-2023

10 47

To.

The District Education Officer (Female)
Swabi.



DA-III

14/12

Subject: - VERIFICATION OF ADJUSTMENT ORDER.

I am directed to refer to your letter No. Nil dated 22-11-2023 on the subject noted above and to state that that as per official record, the adjustment order in question was found as absolutely fake / bogus.

2- In view of the above, I am directed to advise that strict disciplinary proceedings may be initiated against the official(s) concerned for producing a fake / bogus adjustment order and maligning the esteemed office of the undersigned.

Usman Ali
(Usman Ali Mohmand)
SECTION OFFICER (ACCOUNTS)

Endst: of even No. date.

Copy forwarded to:-

1. P.A to Additional Secretary (Gen) E&SE Department.
2. P.A to Additional Secretary (Est-I) E&SE Department.
3. PA to Deputy Secretary (Budget), E&SE Department.

SECTION OFFICER (ACCOUNTS)

Attested
D. Inayat



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-9225344 Email: ddadmn.es@gmail.com

OFFICE ORDER

Mr. Abdul Samad junior Clerk BPS-11, under at the disposal of DEO (M) Swabi is hereby adjusted against the vacant post of junior Clerk BPS-11 at GHS Lahore Gharbi District Swabi on his own pay and BPS in the interest of public service with effect from the date of his taking over charge.

Note:

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

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

3703-8
Endst: No. _____ /F.No. /A-23/MS/Appeal/Swabi/Abdul Samad J/C
Dated Peshawar 28/02/2022

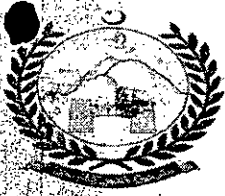
Copy forwarded to the: -

1. District Education Officer (M) Swabi w/r to his letter No. 1456 dated 11/02/2022
2. District Account Officer Concerned.
3. Principal/HM Concerned.
4. Official concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master File.

Attested.
[Signature]

RECEIVED
by
[Signature]

[Signature]
Deputy Director (F&A)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar



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

AUTHORITY LETTER

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Muhammad Rizwan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in **Service Appeal No. 2510/2023** case titled **Abdus Samad Junior Clerk GHSS Lahore District Swabi Vs Government of Khyber Pakhtunkhwa & others** fixed for hearing on 21-02-2024, hence, an authority letter is hereby issued in favor of the above-named officer.


(SAMINA ALTAF)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.