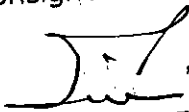


09.12.2021

Counsel for the appellant and Mr. Muhammad Asif Masood, DDA alongwith Muhammad Murtaza, Superintendent for the respondents present.

Learned counsel for the appellant states that he is under instruction from his client to request for withdrawal of the appeal at hand. His signature also obtained in the margin of order sheet. In view of the above, the appeal is dismissed as withdrawn. File be consigned to the record room.

  
(Salah-ud-Din)  
Member(J)

ANNOUNCED  
09.12.2021

  
Chairman


As per instruction of my client, I withdraw the instant appeal.  
09.12.2021

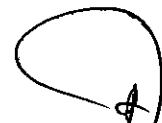
02.08.2021

Learned counsel for the appellant present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Javed Iqbal Stenographer for respondents present.

At the very outset, a notification bearing endorsement No.2715-20 dated 10.10.2019 was produced which shows that in compliance to the judgment of Hon'ble Pehsawar High Court, the present appellant alongwith others were conditionally appointed subject to final decision filed in the Hon'ble Supreme Court of Pakistan. When learned counsel was confronted with the notification he requested for adjournment in order to apprise the Tribunal in respect of the present situation. Case is adjourned to 09.12.2021 for arguments/ further proceedings in view of the notification produced today before this Tribunal.

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

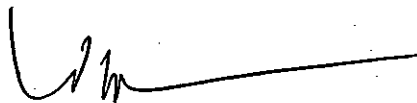
  
(Rozina Rehman)  
Member (J)

02.12.2020

Counsel for appellant present.

Riaz Paindakhel learned Assistant Advocate General for respondents present.

Former requests for adjournment as issue involved in the present case is pending before a Larger Bench of this Tribunal. Adjourned. To come up for arguments on 01.03.2021 before D.B.



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



(Rozina Rehman)  
Member (J)

01.03.2021

Due to COVID-19, the case is adjourned for the same on 01.06.2021.



**READER**

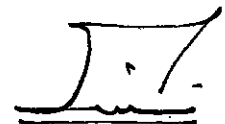
01.06.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Former sought adjournment on the ground that similar issue involved in the instant appeal is pending before a Larger Bench of this Tribunal, therefore, Adjourned. To come up for arguments before the D.B on 02.08.2021.



(ATIQU-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

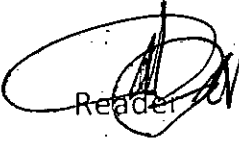


(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

03/4 .2020

Due to COVID19, the case is adjourned to.

06/8/2020 for the same as before.

  
Reader

06.08.2020

Due to summer vacation case to come up for the same on

08.10.2020 before D.B.


  
Reader

08.10.2020

Counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Learned AAG made a request for adjournment in order to produce record/inquiry report. Adjourned. To come up for record/arguments on 02.12.2020 before D.B.

  
(Atiq ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

06.01.2020

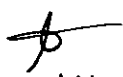
Learned counsel for the appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Fawad Afzal, Senior Clerk for respondents present. Representative of the respondents seeks time for submission of enquiry record. Adjourn. To come up for enquiry record and arguments on 04.02.2020 before D.B.

  
Member

  
Member

04.02.2020

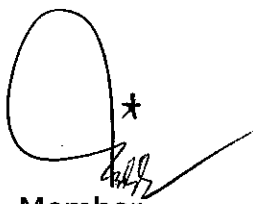
Due to general strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Muhammad Tariq, Assistant for the respondents present. Case to come up for inquiry record mentioned in order sheet dated 21.11.2019 and arguments on 09.03.2020 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

09.03.2020

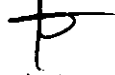
Counsel for the appellant present. Addl: AG for respondents present. Enquiry record not submitted. Respondents are strictly directed to produce enquiry report mentioned in order sheet dated 21.11.2019 positively on the next date of hearing. Adjourned. To come up for record and arguments on 03.04.2020

  
Member

  
Member

17.10.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned Assistant AG requested for adjournment. Adjourned to 21.11.2019 for arguments before D.B.



(Ahmad Hassan)  
Member



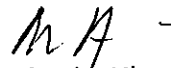
(M. Amin Khan Kundi)  
Member

21.11.2019

Learned counsel for the appellant present. Mr. Riaz Paindakheil learned Assistant Advocate General for the respondents present. Learned Asst: AG requested that the inquiry report is not available on record, therefore, the same may be requisitioned. Respondents are directed to direct the representative to attend the court and furnished the relevant inquiry record on the basis of which the appellant was terminated vide order dated 11.12.2015 positively on the next date. Adjourned. To come up for record and arguments on 06.01.2020 before D.B.




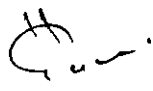
(Hussain Shah)  
Member




(M. Amin Khan Kundi)  
Member

30.01.2019 Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney alongwith M/S Bahadur Computer Operator and Daud Jan Superintendent present. Adjournment requested. Adjourn. To come up for arguments on 14.03.2019 before D.B.

  
Member

  
Member

14.03.2019 Junior for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Junior counsel for the appellant seeks adjournment on the ground that learned senior counsel is not available today. Adjourn. To come up for arguments on 29.03.2019 before D.B.

  
(M. AMIN KHAN KUNDI)  
MEMBER

  
(M. HAMID MUGHAL)  
MEMBER


29.3.2019. The bench is incomplete, therefore,  
The case is adjourned to. 14-5-19

  
Reader

14-5-19 The bench is incomplete therefore,  
the case is adjourned to. 16-10-19

  
Reader

16-10-19 The bench is incomplete, therefore,  
the case is adjourned to. 17-10-19

  
Reader

27.09.2018

As per order of worthy chairman in service appeal No, 296/16 Sakhi Akbar vs Secretary Education etc, this case be fixed before the bench comprising of Mr Mohammad Hamid Mughal learned Member (J) & Mr Ahmad Hassan learned Member (E) for hearing and disposal ~~01-11-2018~~

  
Registrar

01.11.2018

Due to retirement of Hon'able Chairman, the Tribunal is defunct. Therefore, the case is adjourned for the same on 03.12.2018 before D.B.

  
Reader

03.12.2018

Junior counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for arguments on ~~29~~ 01.2019 before D.B.

  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

02.01.2019

Learned counsel for the appellant and Mr. Riaz Paindakheil learned Assistant Advocate General alongwith Sarwar Khan ADEO present. Representative of the respondents seeks time to furnish complete record. Granted. To come up for record and arguments on 30.01.2019 before D.B.


  
Member

  
Member




31.08.2018 Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. Adjourned. To come up for order on 18.09.2018.

  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member


18.09.2018 Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. Adjourned. To come up for order on 27.09.2018.

  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

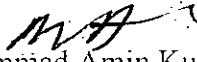
27.09.2018 Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. The case was fixed for order, however, Judicial Member want to submit that perusal of the file reveal that on 23.04.2018 the bench comprising of Mr. Muhammad Hamid Mughal and Mr. Ahmad Hassan heard the arguments in all connected appeals including the present appeal but decided only five appeals out of total connected appeals and adjourned the remaining connected appeals including the present appeal for arguments. Propriety demand that the bench comprising above named members should also decide the remaining connected appeals including the present one. Hence, the case file be put up today before the learned Chairman of Service Tribunal for appropriate orders.

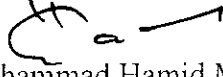
  
(Ahmad Hassan)  
Member (E)

  
(Muhammad Amin Kundi)  
Member (J)

29.06.2018


Appellant with counsel present. Mr. Kaibrullah Khattak, Additional AG alongwith Mr. Ahmad Khan, Agency Education Officer and Mr. Daud Jan, Superintendent for the respondents present and requested for adjournment. Adjourned. To come up for arguments on 17.08.2018 before D.B.

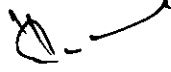
  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

17.08.2018

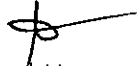
Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 28.08.2018 before D.B.


  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

28.08.2018

Appellant with counsel and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Ahmad Khan, Additional Agency Education Officer and Mr. Daud Jan, Superintendent for the respondents present. Arguments heard. To come up for order on 31.08.2018.

  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

28.05.2018

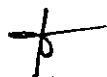
Bench is incomplete. To come up for order  
on 31.05.2018 before D.B



Member

31.05.2018

Learned Additional Advocate General  
present. Some points needs consideration. Learned  
counsel for the appellant is not available. Adjourned. To  
come up for further arguments on 07.06.2018 before  
D.B



(Ahmad Hassan)

Member



(Muhammad Hamid Mughal)

Member

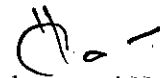
07.06.2018

Junior to counsel for the appellant and Mr. Kabir Ullah  
Khattak learned Additional Advocate General alongwith Daud Jan  
ADO for the respondents present. Junior to counsel for the appellant  
seeks adjournment as senior counsel is not in attendance. Adjourned.  
To come up for arguments on 29.06.2018 for arguments before D.B.



(Ahmad Hassan)

Member



(Muhammad Hamid Mughal)

Member

10.04.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Last opportunity granted. To come up for record and arguments on 23.04.2018 before the D.B.

  
Member

  
Chairman

23.04.2018

Learned counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General alongwith Ahmad Khan AEO for the respondents present. Arguments heard. To come up for order on 09.05.2018 before D.B

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

08.05.2018

The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come on 28.05.2018

  
READER

08.02.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Superintendent for the respondents present. Due to shortage of time, arguments could not be heard. To come up for record and arguments on 29.03.2018 before the D.B.

  
Member

  
Chairman

29.03.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Adjourned. To come up for record and arguments on 04.04.2018 before D.B.


  
Member

  
Chairman

04.04.2018

Counsel for the appellant and Addl; AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for record and arguments on 10.04.2018 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Hamid Mughal)  
Member

17.08.2017

Junior to counsel for the appellant and Asstt. AG alongwith Daud Jan, Superintendent for the respondents present.

Since the matter in controversy has already been resolved by the judgment of Hon'ble Peshawar High Court reported as PLD 2014-Peshawar-132, there is no need to decide this issue any further. The matter may be put up before the D.B for decision on merits. To come up for arguments before the D.B on 29.11.2017.



(M. Hamid Mughal)  
Member



Chairman

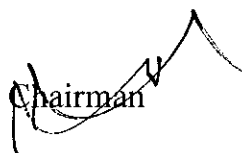
(Ahmad Hassan)  
Member

29.11.2017

Counsel for the appellant Mr. Ziaullah, DDA alongwith Mr. Daud Jan, Supdt for the respondents present. Representative of the respondents is directed to bring enquiry report and other documents. To come up for such record and arguments on 08.02.2018 before the D.B.



Member



Chairman

07.03.2017

Counsel for the appellant and Addl: AG for respondents present. Rejoinder submitted. To come up for arguments on 10.07.2017 before D.B.

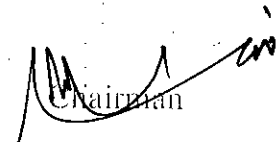
  
(ASHFAQUE TAJ)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

10.07.2017

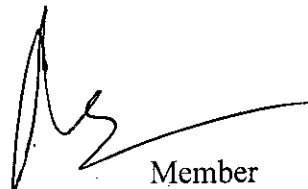
Counsel for the appellant and Muhammad Jan, Government Pleader for the respondents present. Vide our detailed order of to-day in service appeal No. 261/2016, entitled "Hamid Ullah Khan Versus Director of Education FATA, FATA Secretariat, Peshawar and others" a special bench of 3 members is constituted in which Mr. Muhammad Hamid Mughal, Learned Member (Judicial) shall also be included in addition to the present bench. To come up for arguments on the point of jurisdiction on 17.08.2017.

  
Member

  
Chairman

24.08.2016

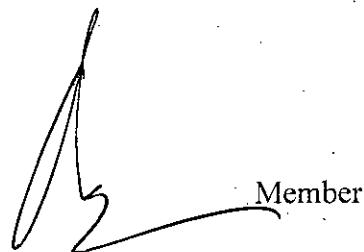
Clerk to counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl. AG for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity is extended. To come up for written reply/comments on 3.11.2016 before S.B.



Member

03.11.2016

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for further adjournment. Another last opportunity is extended. To come up for written reply/comments on 12.01.2017 before S.B.



Member

12.01.2017

Counsel for the appellant and Mr. Daud Jan, Superintendent alongwith Additional AG for respondents present. Written statement by respondents No. 2 & 3 submitted. Learned Additional AG relies on the same on behalf of respondents No. 1 & 4. The appeal is assigned to D.B for rejoinder and final hearing for 07.03.2017 before D.B.



Chairman




14.4.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as D.M (BPS-15) GHS Kochi Kuram Agency when terminated from service vide impugned order dated 11.12.2015 on the allegations of irregularities in his appointment where-against he preferred departmental appeal on 18.12.2015 which was not responded and hence the instant service appeal on 28.03.2016.

That appointment of the appellant was made in accordance with provisions of Rule-10 of Khyber Pakhtunkhwa Civil Servants (Appointments, Promotion and Transfer) Rules, 1989 and that there was neither any illegality nor irregularity in the said appointment and, moreover, neither any enquiry was conducted nor any opportunity of hearing extended to the appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 15.06.2016 before S.B.

  
Chairman

15.06.2016

Counsel for the appellant and Asstt. AG alongwith Daud Jan, Supdt. for the respondents present. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 24.08.2016 before S.B.

  
Chairman

Appellant Deposited  
Security & Process Fee

Form- A  
FORM OF ORDER SHEET

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

Case No. 305/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.03.2016	<p>The appeal of Mst. Shamim Bibi presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2	29.3.16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>12.4.16</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
	12.04.2016	<p>Junior to counsel for the appellant present. Seeks adjournment. Case is adjourned for preliminary hearing to 26.4.2016.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman</p>

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

APPEAL NO. 305 /2016

**SHAMIM BIBI**

**VS**

**EDUCATION DEPTT:**

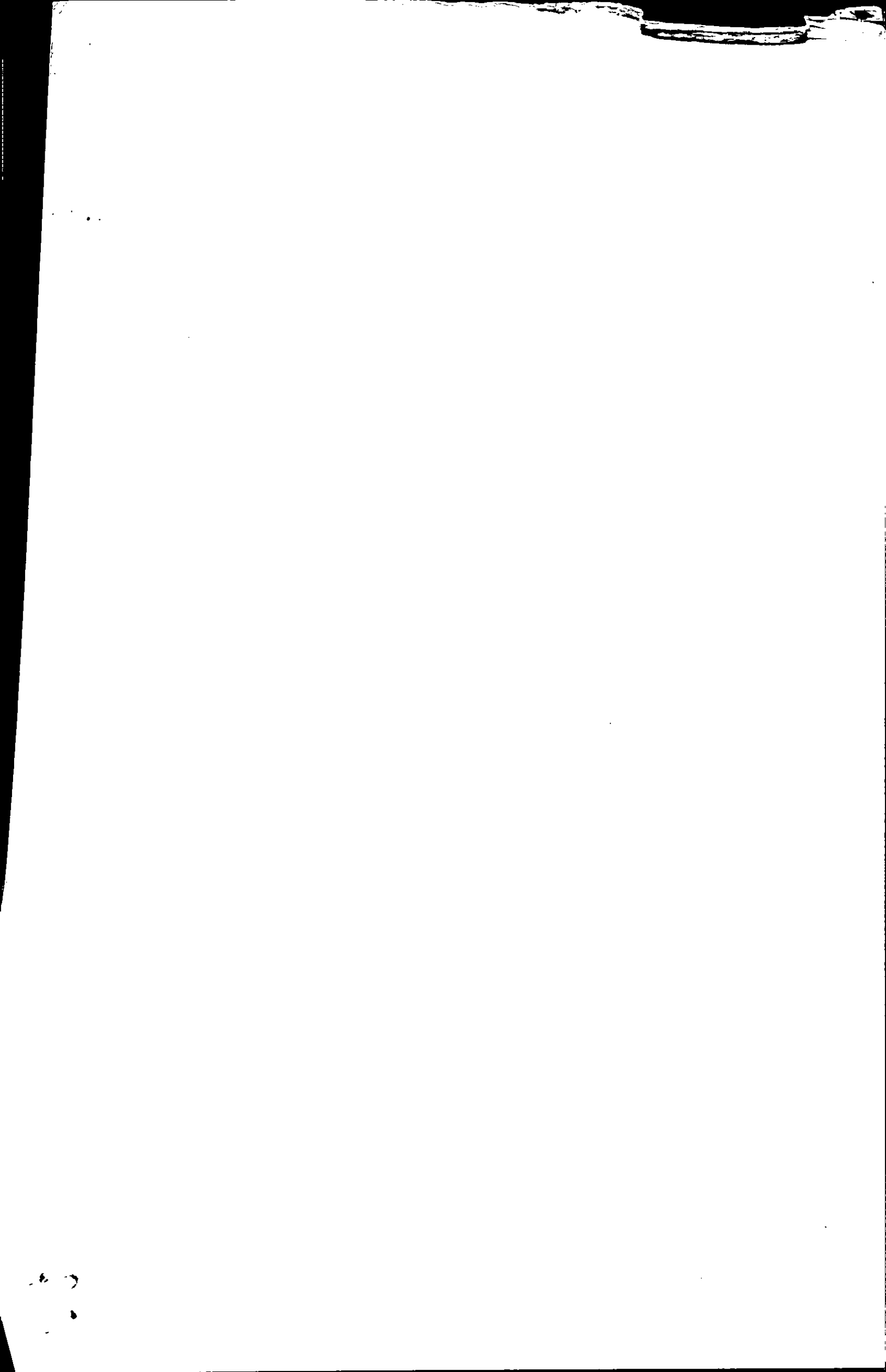
**INDEX**

<b>S. NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
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3.	Advertisement	<b>B</b>	6.
4.	Appointment order	<b>C</b>	7.
5.	Service book	<b>D</b>	8- 12.
6.	Charge report	<b>E</b>	13.
7.	Medical certificate	<b>F</b>	14.
8.	Educational testimonials	<b>G</b>	15- 19.
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10.	Impugned order	<b>I</b>	27- 28.
11.	Departmental appeal	<b>J</b>	29.
	Vakalat nama	.....	30.

**APPELLANT**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**



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

APPEAL NO. 305 /2016

K.W.P. Provincial  
Service Tribunal  
Diary No 279  
dated 28-3-2016

Mst: Shamim Bibi, Ex: D.M (BPS-15),  
GGMS Dogar, Kurram Agency..... **APPELLANT**

**VERSUS**

- 1- The Additional Chief Secretary FATA, FATA Secretariat, Warsak Road, Peshawar.
- 2- The Director of Education FATA, FATA Secretariat, Warsak Road, Peshawar.
- 3- The Additional Agency Education Officer, Lower & Central Kurram Agency at Sadda.
- 4- The Agency Account Officer, Kurram Agency.

..... **RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 11.12.2015 WHEREBY THE SERVICES OF THE APPELLANT HAS BEEN TERMINATED WITH EFFECT FROM THE DATE OF HIS APPOINTMENT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 11.12.2015 may be set aside and the respondents may be directed to re-instate the appellant with all back benefits w.e.f the date of his appointment. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

Brief facts giving rise to the present appeal are as under:

- 1- That initially the appellant was appointed in the respondent Department as PST on contract basis vide order dated 28.5.2010. That the services of the appellant were extended time to time. Copy of the first appointment order is attached as annexure ..... **A.**

*Handwritten notes:*  
28/3/16

- 2- That the respondent No.3 through advertisement published in the Daily News Paper advertised various posts including the post of D.M (BPS-09) now (BPS-15). Copy of the advertisement is attached as annexure ..... **B.**

*Handwritten notes:*

- 3- That appellant having the Domicile of Kurram Agency and having the requisite qualifications for the said post applied through proper channel and after participated in the test and interview the appellant was declared successful in the said selection process. That in consequence the appellant was offered the said post through appointment order dated 18.01.2013. Copies of the service book, charge report, medical certificate and Education Testimonials are attached as annexure ..... **C, D, E and F.**
- 4- That in response the appellant started performing his duty at the concern station quite efficiently and up to the entire satisfaction of his superiors.
- 5- That the service book of the appellant is also been prepared by the respondent No.3 and proper entry regarding the appointment of the appellant has been made by the respondent No.3 in the said service book of the appellant. That astonishingly right from appointment the salaries of the appellant has been withheld by the respondents without assigning any reason and clear justification. Copy of the service book is already attached as annexure---- **C.**
- 6- That appellant time and again visited the concerned quarter for the release of his salaries but of no avail, feeling aggrieved from the inaction of the respondents by not releasing the monthly salary of the appellant the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. W.P. 3602-P/2014 which is still pending adjudication before the august Peshawar High Court Peshawar. Copy of the Memo of writ petition No WP 3602-P/2014 is attached as annexure ..... **G.**
- 7- That astonishingly the respondent No.3 issued the impugned order dated 11.12.2015 whereby the services of the appellant has been terminated with retrospective effect without conducting regular inquiry and without assigning any reason/clear justification. Copy of the impugned order dated 11.12.2015 is attached as annexure ..... **H.**
- 8- That appellant feeling aggrieved from the impugned order dated 11.12.2015 filed Departmental appeal on 18.12.2015 before the respondent No.2 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure ..... **I.**

**GROUND:**

- A- That the impugned order dated 11.12.2015 issued by the respondent No.3 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015.
- D- That no show cause notice has been served on the appellant by the respondent Department before issuing the impugned order dated 11.12.2015 against the appellant.
- E- That no regular inquiry has been conducted before issuing the impugned order dated 11.12.2015.
- F- That no chance of personnel hearing/personnel defense has been given to the appellant before issuing the impugned order dated 11.12.2015.
- G- That the impugned order dated 11.12.2015 has been issued by the respondents in violation of the principle of Locus Poenitentiae.
- H- That appellant has successfully completed his probationary period and has served the respondent Department for more than three years but inspite of that the respondent No.3 issued the impugned order dated 11.12.2015.
- I- That the respondent Department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 against the appellant.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 19.3.2016

**APPELLANT**



**SHAMIM BIBI**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

**(0345-9383141)**



ATTESTED

Agency Education Officer  
Sadda Kurram Agency

Director of Education (P.V.A) NWFP, Shikhar  
Asst. District Agent Lower Kurram Sadda  
Agency Account Officer Peshawar  
Headmaster Government  
Office No.

NO. 1169-72 / 1110  
Dated 28/5 / 2010  
Copy forwarded to the

Add. Agency Education Officer  
Sadda Kurram Agency

1. Shear directed to produce his Medical certificate from the Medical Superintendent Hospital, Peshawar.  
2. Her appointment is purely made on temporary and contract basis and liable to termination at any time without assigning any notice, in case he wants to resign the post, he will have to give one month prior notice or forfeit one month pay in lieu thereof.  
3. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the issuing authorities concerned.  
4. If she failed to take over charge within 15 days, his appointment will automatically be considered as cancelled.  
5. Change reports should be submitted to this office.  
6. Her appointment will be considered regular but without pension/ gratuity on the term of Section 13 of the NWFP Civil Service Act 1973 as amended with civil service amendments Act 2005 but will be entitled to contribution/ Provident fund at such rate as may be prescribed by the Govt.

TERMS/CONDITIONS

S	Name of Candidate/other Name	School where Appointed	Remarks	Against Vacant Post	Kurram Agency
1	Shahin Bibi D/O Spun Lal	(P.S) Said Kurram (Central)			

Consequent upon the approval by the Selection Committee the appointment of the following P.T.C. teacher is hereby ordered in the school noted against his name against vacant P.T.C. post purely on temporary basis in BPS No 7 (P.S) 9/11 passed F.A/Sec 2nd division plus casual allowances as admissible under the rules with effect from the date of his taking over charge.

APPOINTMENT

OFFICE OF THE ADDITIONAL EDUCATION OFFICER, SADDA KURRAM AGENCY

A-5





OFFICE SADDA KURRAM AGENCY

PPDOL 012-11002-1001/2013  
No. \_\_\_\_\_ /Edu  
Dated Sadda the \_\_\_\_\_ / 2013

C-7

APPOINTMENT

Consequent upon the approval by the Selection Committee, the appointment of the following DM Female teachers are hereby ordered in the school noted against their names against vacant posts purely on Regular contract basis in BPS No 9 plus usual allowances as admissible under the rules with immediate effect.

S. No.	Name of Candidate	Father Name	School where Appointed	Remarks
1	Samreena Sadai	Haji Ameen Khan	GGMS Tarali	Against Vacant Post
2	Shameem Bibi	Spin Gul	GGMS Dogar	Against Vacant Post
3	Parveen Bibi	Spin Gul	GGMS Ossai	Against Vacant Post
4	Bibi Jamila	Mir Bahadar Khan	GGMS Tabikhonikhel	Against Vacant Post

TERMS/CONDITIONS

1. They are directed to produce their Medical certificate from the Medical Super Allied Hospital Sadda Kurram Agency.
2. Their age should be between 18-40 years.
3. Their appointment is purely made on temporary and Regular contract basis and liable to termination at any time without assigning any notice, in case they want to resign their post they will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the Issuing Authorities concerned.
5. If they failed to take over charge within 15 days, their appointment will automatically be considered as cancelled.
6. Charge reports should be submitted to this office.
7. Their appointment will be consider as regular but without Pension/gratuity on the term of section 15 of the KPK Civil Servant Act 1973 as amended with civil servants amendment Act 2001 but will be entitled to contribution Provident Fund at such rate as may be prescribed by the govt.

*[Signature]*  
Add: Agency Education Officer,  
Lower & Central Kurram Sadda

No. 125-33 / Edu Dated 15/11/2013  
Copy forwarded to the:

1. Director of Education FATA KPK Peshawar
2. Agency Account Officer Parachinar
3. Political Agent Kurram Parachinar
4. Asst. Political Agent Central Kurram
5. Teachers Concerned
6. Headmistress Concerned
6. Office file

ATTESTED

*[Signature]*  
Add: Agency Education Officer,  
Lower & Central Kurram Sadda

8

Name (FC) Miss Shehmin Bai

Nationality and Religion (Wettar (Zelmuist) - Islam

Residence (Willage to Plo Bagan Telisik Luus Kubom

Father's name and residence (Spin Gul address as above

Date of birth by Christian era as nearly as 03-03-1983

can be ascertained (Hand mark with a slightly loose

Exact height by measurement

Personal mark of identification

Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

Little Finger Ring Finger Middle Finger

Fore Finger Thumb

Signature of Government Servant

Signature and designation of the Head of the office or other Attesting officer

Attesting Officer

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in Lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

ATTESTED


1.	2.	3.	4.	5.	6.	7.	8.	9.
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating name of substantive appointment or (i) whether service ceases for pension under rule 379 of C.S.R (Pb.) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Signature of Government servant	Signature of the Head of Office or Officiating Officer in official capacity Form-130
	نامی مستقل یا کام مقام	اگر کوئی ہو تو رول نمبر 379 کے تحت مستثنیٰ ہے	تعداد بطور غرضی ملازمت	زائد بطور کام مقام	بیسوا تعداد دیگر الائش	تاریخ تقرری	دستخط سرکاری ملازم	دستخط سربراہ
			Rs. Ps.	Rs. Ps.				
<p>① Passed SSC Exam (A) 2007 under Roll No 724488 from BISE Kohat Secured 627/1100 marks.                      verify vide AMED office no 316/edu dated 15/11/13                      BISE Kohat no 4204/sec/pariff/sec/BISE dated 20/8/13</p>								
<p>② Passed EA Exam (A) 2009 under Roll No 27550 from BISE Kohat Secured 735/1100 marks.                      verified vide AMED office no 316/edu dated 15/11/13                      BISE Kohat no 1294/sec/pariff/sec/BISE dated 5/4/2013</p>								
<p>③ Passed BA Exam (A) 2011 under Roll no 30763 from BIST at Kohat Secured 311/550 marks. Registration no 2010-PCRU-378                      result declared on 29/8/2011</p>								
<p>④ Passed PTC exam (Aut 2010) under Roll No AC 640946 Registered No 09AKMO0111 from Aioic Islamabad Secured 610/900 marks. Result declared on 07/08/2011</p>								

Adt. Agency Execution Officer  
L&C Murram & Satta

Adt. Agency Execution Officer  
L&C Murram & Satta





1.	2.	3.	4.		5.		6.	7.	8.	9.
Name of Post	Whether Substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 3.29 of C.S.R. (Ps.) Volume II	Pay in substantive Position		Additional pay for Officiating		Other emoluments falling under the same pay	Date of appointment	Signature of Government servant	Signature designated the Head of Office or a checking Officer in column 9 in column 1
			Rs.	Ps.	Rs.	Ps.				
درجہ ملازمت	عارضی مستقل قائم مقام	اگر عارضی ہے رواں کے مطابق نہیں سکتا ہے؟	تعمیرات بطور عارضی ملازمت		زائد کوٹوال بطور قائم مقام		بابتوائے تعمیرات دیگر الادیس	تاریخ تقرری	دستخط سرکاری ملازم	دستخط سرکاری ملازم
P.T.C Post		BPS-7			3530			29-5-2006	(S)	(S)
GGPS Said/Koran etc										
do - do -					3530			12 12/10	(S)	(S)
do - do -		BPS7(5800-320-15400)			5800			7 1/2011	(S)	(S)
do - do -		BPS9(6200-380-17600)			6200			7-7-2011	(S)	(S)
do - do -					6200			1-12-2011	(S)	(S)
do - do -					6580			1-12-2012	(S)	(S)
do - do -					6960			1-12-2013	(S)	(S)
<b>ATTESTED</b>										
										



21/13

E (13)

**CHARGE REPORT**

No. SHAMIM BIBI s/o SPINGUL  
Name taken of the charge of DM post at ESMS Dogar 2013

Kurrum Agency on 16-01  
Fore Noon / After Noon vide Agency Education Officer Kurrum Agency

Endst. No: 125-33 / Edu dated 15/1/20

Signature of Receiving [Signature] ✓ Signature of Relieved  
Govt. Servant \_\_\_\_\_ Govt. Servant \_\_\_\_\_

No. \_\_\_\_\_ / Dated \_\_\_\_\_ / 20



**ATTESTED**

- Copy to the :-
1. Addl. Agency Education Officer Kurrum at sadda :
  2. Agency Account Officer Kurrum Pasachinar.
  3. AAEO Local Office Sadda CK & LK.
  4. Office files record.

[Signature]

OFFICE OF THE SMO INCHARGE THQ HOSPITAL SADDA KURRAM AGENCY.  
HEALTH AND AGE CERTIFICATE

F-14

Name of the applicant, MISS SHAMIM BIBI

Parent's name, SPIN GUL

Date of birth, 03.03.1983

Residence, Village BAGAN LOWER P/O BAGAN & TEHSIL LOWER KURRAM AGENCY

Caste, ATTAR

Height of the applicant, 5 FEET 2 INCH

Previous education, NIL

Signature of the applicant, [Signature]

Signature of the Office, \_\_\_\_\_

Work over charge  
on 29/5/2010

Seal of Office, [Signature]

It is certified, MISS SHAMIM D/O SPIN GUL

is employed in the Office of the ADD, AGENCY EDUCATION

and cannot discover that he has any communicable Diseases OR

any physically abnormality OR bodily infirmity except nil. I do

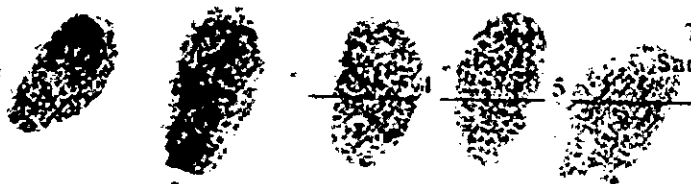
not find any disqualification for employment in the office of the

EDUCATION DEPARTMENT LK & CK, her age is according to her CNIC

& her date of birth is (29 Years, 11 Month and 15 days) and by appearance about

Signature of the SMO Incharge

SMO Incharge THQ  
Hospital SADDA  
Dated, 18.02.2013  
Signature of the SMO Incharge



ATTESTED

[Signature]

Attested 25/2/13  
Countersigned,  
Medical Superintendent,  
Agency Head Quarter Hospital  
Parachinar.

G-15

S. No. 007018

Roll No. 27550

# Board Of Intermediate and Secondary Education

## Kulhat

### Khyber Pakhtunkhwa, Pakistan.

#### HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

#### GROUP: HUMANITIES

#### SESSION: 2009 ANNUAL

This is to Certify that SHAMIM BIBI Son / Daughter of Mr. SPIN GUL  
 and a student of KURRAM AGENCY having Registered No. \_\_\_\_\_  
1585-BK/P-2008 has passed the *Intermediate Examination* of the Board of Intermediate and Secondary Education, Rohat held  
 in May, 2009 as a PRIVATE candidate. He / She obtained 735 Marks out of 1100 and has been placed in B  
 Grade. Representing VERY GOOD.

*[Signature]*  
 Asst. Secretary (H)

*[Signature]*  
 Secretary

This certificate is issued without alteration or erasure.

TESTED

1290

S. No.

(16)

# Directorate of Curriculum & Teachers Education



## Khyber Pakhtunkhwa, Peshawar DETAILED MARKS CERTIFICATE

Training Classes Examination (Drawing Master)

Name: Shamir Raza Session: 2014

Father's Name: Spin Gul Roll No. 289

Subject	Maximum Marks	Marks obtained:		
		Internal	External	In words
1. Scale, Technical and Geometrical Drawing, Free hand Sketching	100			60
2. Model Drawing	50			43
3. Nature Study	50			34
4. Black Board Sketching	50			40
5. Craft	200			129
6. Islamiyat	100			57
7. History of Art	100			50
8. Expressional Drawing	50			40
9. Physical Education	50			30
10. Design	50			30
11. Teaching Practice	200			178
Total	1000			713

Note: Ergonomics is exempted.

Rated/Passed Passed Division: 1st

Prepared by: [Signature]

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

Date of Declaration of Result: 1-11-2014

Assistant Director (Examination),  
Khyber Pakhtunkhwa, Peshawar.

### ATTESTED

[Signature]

Serial No. 005793

Roll No. 30765

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.

2010-P.KG-378

17

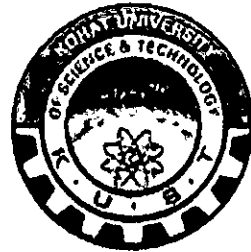
# Kohat University of Science & Technology, Kohat (Pakistan)

Session April, 2011

SHAMIM BIBI DAUGHTER of SPIN GUL and a student  
of KURBAN AGENCY having passed the prescribed  
examination held in JULY, 2011 is this day admitted by

The Kohat University of Science & Technology, Kohat  
to the Degree of  
**Bachelor of Arts**  
in the SECOND Division

The Examination was taken as a whole / in parts



Result declared on AUGUST 29, 2011

Controller of Examinations

Countersigned **ATTESTED**

Muhammad  
Vice Chancellor

S.No. KB

691111

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 724488

18

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



**KOHAT**

**(N.W.F.P. Pakistan)**

**Secondary School Certificate Examination**

**Session 2007 ( Annual )**

This is to certify that Shamim Bibi  
Daughter of Spin Gul  
and a resident of Kurram Agency  
has passed the Secondary School Certificate Examination of the Board  
of Intermediate and Secondary Education, Kohat held in April, 2007  
as a Private Candidate. She obtained 627 Marks out of 900 and  
has been placed in Grade B Representing Very good.

The candidate passed in the following subjects:

- |                |               |                     |                        |
|----------------|---------------|---------------------|------------------------|
| 1. English     | 2. Urdu       | 3. Pakistan Studies | 4. Islamiyat (Comp)    |
| 5. Mathematics | 6. G. Science | 6. Islamic Studies  | 7. Art & Model Drawing |

Date of birth according to admission form is: 03-03-1983

In Words: Third March One Thousand Eighty Three

Asst. Secretary

This Certificate is valid without alteration or change

Secretary

**ATTESTED**

H-20

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 3602-P /2014

Farooq Muhammad and others.....Petitioners

**VERSUS**

Additional Chief Secretary, FATA & others.....Respondents

**INDEX**

S.No	Description of Documents	Annex	Pages
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5.	Copy of order/ appointment letters	B	10-22
6.	Copies of medical certificates	C	23-44
7.	Copy of charge reports	D	45-68
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10.	Court Fee		77
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Through

Petitioner

*Adnan Khattak*

Adnan Khattak

Advocate, Peshawar

Cell: 0300-5930703

Date: 11.11.2014

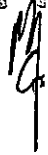
**ATTESTED**

*[Signature]*

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. \_\_\_\_\_/2014

- ✓ 1. Farooq Muhammad S/o Arab Gul
- ✓ 2. Muhammad Saeed S/o Zarbat Khan
3. Ajab Khan S/o Gul Muhammad
- ✓ 4. Latif Hussain S/o Inam Hussain
5. Muhammad Ayaz S/o Gul Karim
6. Aziz ur Rehman S/o Said Rehman
7. Taj Ahmad S/o Lal Muhammad
8. Feroz Khan S/o Gul Zaman Khan
9. Said Hassan S/o Muhammad Hassan
10. Hussain Ahmad S/o Muhammad Rafiq
- ✓ 11. Wahid Zaman S/o Zawta Khan
12. Mst. Muzlifa D/o Muhammad Farooq
13. Muhammad Yousaf S/o Abdul Aziz
- ✓ 14. Aqib Zaman S/o Syed Amir Shah (All CT Teachers,  
Lower & Central Kurram Agency)
15. Khiyal Bat Khan S/o Hibat Khan
16. Kifayatullah S/o Mir Jehan
- ✓ 17. Zar Taj Bibi D/o Haji Ajmir Khan (All PET Teachers,  
Lower & Central Kurram Agency)
18. Noor Zaman S/o Noor Jamal
- ✓ 19. Mst. Shamim Bibi D/o Spin Gul

**ATTESTED**



- ✓ 20. Parveen Bibi D/o Spin Gul (All DM Teachers, Lower & Central Kurram Agency)
- ✓ 21. Siraj ud Din S/o Walayat Khan
- 22. Zubair Khan S/o Ghafoor Khan (Both Junior Clerks/ JC, Lower & Central Kurram Agency)
- 23. Rehmatullah S/o Muhammad Rahim (Pesh Imam, Lower & Central Kurram Agency)
- 24. Rashid Khan S/o Khadi Khan (Lab Assistant)

PETITIONERS

**VERSUS**

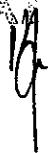
- 1. Additional Chief Secretary, FATA  
FATA Secretariat, Warsak Road, Peshawar
- 2. Secretary Finance,  
Govt of KPK, Civil Secretariat, Peshawar
- 3. Additional Agency Education Officer,  
Lower & Central Kurram, Sadda
- 4. Agency Account officer, Parachinar
- 5. Director of Education, FATA KPK, Peshawar

RESPONDENTS

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

Respectfully Sheweth:

- 1. That the respondent No.3 (Additional Agency Education Officer, Lower & Central, Kurram Sadda)

**ATTESTED**  


floated advertisement in daily newspapers about the posts of PET, CT, Lab Assistant etc and petitioners, being eligible and qualified, applied for the same for selection on merit as such. (Copy of advertisement is attached as Annexure "A").

2. That the petitioners were interviewed and after going through the prescribed procedure of selection, they were, on the recommendation of Departmental Selection Committee appointed as such vide orders/ letters dated 15.01.2013, 18.01.2013 and 21.01.2013 respectively. (Copy of order/ appointment letters are attached as Annexures "B").

3. That petitioners were performing their duties with full devotion, after carrying-out their medical examination and taking charge on their respective posts, performing their duties till date. (Copies of medical certificates are attached as Annexure "C", charge reports are Annexure "D" and attendance sheets are Annexure "E").

4. That petitioners contacted respondents for payments of their monthly salaries but were told time and again that the department is going to prepare bills for the purpose. Every month took such practice but no fruitful result was ever achieved.

**ATTESTED**

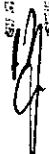


- (24)
5. That petitioners were constrained to prefer their departmental appeals before the authorities but in vain. (Copies of appeals are attached as Annexure "F"). Hence, the petitioners being aggrieved, approached this Honourable Court, inter alia, on the following grounds

**G R O U N D S:**

- A. That from the date of appointments, petitioners are performing their duties on the respective posts till date.
- B. That respondents were contacted from time to time for payments of their monthly salaries but every time they were deceived with commitment to be paid the same in the next month.
- C. That when petitioners came to know that the department is not fulfilling its commitment for the purpose, they agitated the matter through representations, but without any response.
- D. That two junior clerks namely Sakhi Akbar S/o Siddique Akbar and Abidullah S/o Muhammad Ghulam were also appointed vide dated 18.01.2013 according to the same advertisement dated 25.10.2012, are receiving salaries from the respondent No.3 which is clear cut violation of Article 25 of the Constitution of Pakistan, 1973.

ATTESTED



E. That the act of the respondents by not paying the monthly salaries to the petitioners since the date of appointments, they are not only violating natural justice but also the cardinal principles of Islam.

F. That the petitioners are performing their respective duties honestly and the attendance sheets are duly attested by the Headmaster. (Copies are attached).

In view of the above, it is therefore, humbly prayed that on acceptance of this petition, this Honorable Court may graciously be pleased to:

- i. Direct the respondents to forthwith pay monthly salaries to the petitioners.
- ii. Any other relief available in the circumstances of the case, not specifically asked for, may also be granted to the petitioner.

Through

*Adnan Khattak*  
Petitioner

Adnan Khattak  
Advocate, Peshawar

Date: 11.11.2014

CERTIFICATE:

Certified on instructions of my client that petitioners have not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.

ADVOCATE

*Adnan Khattak*

LIST OF BOOKS:

- 1. Constitution of Islamic Republic of Pakistan, 1973
- 2. Any other law books according to need

ATTESTED

*[Signature]*




ADVOCATE

*Adnan Khattak*

PESHAWAR HIGH COURT, PESHAWAR.

26

FORM 'A'  
FORM OF ORDER SHEET

S.No.	Date of order	Order or other proceedings with signature of the Judge
1	2	3
	1.12.2015.	<p><u>W.P.No.3602/2014.</u></p> <p>Present: Mr.Adnan Khattak, Advocate for the petitioners.</p> <p>Syed Qaiser Ali Shah, AAG for Provincial Government.</p> <p>Comments have not been filed. The latter seeks time to do the needful. May do so. Adjourned to a date in office.</p> <p style="text-align: right;">   <u>JUDGE</u> </p> <p style="text-align: right;">   <u>JUDGE</u> </p> <p style="text-align: center;"><b>ATTACHED</b></p> <p style="text-align: center;"></p> <p style="text-align: center;"><u>*M.Gul*</u></p>

Additional Agency Education Officer

Lower &amp; Central Kurram Agency.

NO 2887-93/Edu

Dated 12/12/2015

I-27  
②TERMINATION ORDER

Consequent upon the direction by the competent authority, Director of Education FATA Peshawar vide his No 12228 dated 07.12.2015, on the decision of oversight committee the following in-eligible teaching/Non teaching appointees (M/F) BPS (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S #	Name	Father Name	Desg:	B P S	Name of Institution	Remarks
1	Aqib Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota.
2	Muhammad Asif	Syal Khan	CT	9	GHS Makhizai	Terminated due to excess in sub divisional quota & advance appointment against on fill post.
3	Sara Bibi	Sakhi Mar Jan	DM	9	GGMS Bagan	DM diploma found fake & bogus.
4	Shahid Mahmood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of JDPE found fake & bogus.
5	Muhammad Usman	Haji Shah Wazir	PET	9	GMS Arawali	Having no professional qualification.
6	Muhammad Alam Khan	Salam Khan	J/C	7	GHS Makhizai	Failed in typing test & rejected by enquiry officers.
7	Zubair Khan	Ghafoor Khan	J/C	7	GDC Bagan	Rejected by PA enquiry.
8	Muhammad Sadiq	Gul Mar Jan	J/C	7	GGDC Alizai	Failed in typing test as per advertisement & rejected by enquiry officers.
9	Sakhi Akbar	Sadiq Akbar	J/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officers.
10	Sadia Batool	Abid Alam Jan	Lab/A-sstt	7	GGDC Alizai	Documents not provided for verification.
11	Muhammad Saeed	Zar Bat Khan	CT	9	GHS Baza	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota.
13	Latif Hussain	Inam Hussain	CT	9	GHS Angori	Domicile holder of upper kurram.
14	Wahid Zaman	Zawta Khan	CT	9	GHS Dogar	Terminated due to excess in sub divisional quota
15	Farooq Muhammad	Arab Gul	CT	9	GMS Taudy Oby	Out of merit (M.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar Khan	CT	9	GGMS Dogar No-2	Terminated due to excess in sub divisional quota.

ATTESTED



17	Bibi Sakina	Haji Gul Akbar	CT	9	GGMS Tabi Khonikhel	Terminated due to excess in sub divisional quota.
18	Samreen Sadaf	Haji Amin Khan	DM	9	GGMS Tarali	Documents not provided for verification.
19	Shamim Bibi	Spin Gul	DM	9	GGMS Dogar NO-2	Having no DM certificate & has not provide BA degree for verification.
20	Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM certificate & has not provide BA degree for verification.
21	Bibi Jamila	Niaz Bahadar Khan	DM	9	GGMS Tabi Khonikhel	Having no DM certificate/diploma
22	Sajid Rehman	Haji Haider Khan	PET	9	GMS Dappa	JDPE diploma found fake & bogus.
23	Zia ul Alam	Noor Alam	PET	9	GMS Khazeena	JDPE diploma found fake & bogus.
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai	JDPE diploma found fake & bogus.
25	Kifayatullah	Mir Jehan	PET	9	GMS Kimal Baza	Having no professional documents.
26	Zar Taj Bibi	Haji Ajmir Khan	PET	9	GGMS Ossai	Having no professional documents & Lower Kurram domicile holder while she was appointed in Central Kurram, also appeared in CT(LK) while appointed as PET(CK).
27	Sajid Rehman	Said Aslam Khan	I/C	7	GHS Paloseen	Has been excluded by PA enquiry.
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatoo	Failed in typing test as per advertisement & rejected by enquiry officers.

Addl: Agency Education Officer  
Lower & Central Kurram Sadda.

No. 2987-93 /Edu: Dated 11 / 12 / 2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent, Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for similar action.

Addl: Agency Education Officer  
Lower & Central Kurram Sadda.

**ATTESTED**

جنوبی صوبہ ڈاکٹر بلگیر ایجوکیشن فاؤنڈیشن فاؤنڈیشن سیکرٹریٹ ورسکو روڈ کراچی

(29) - J

درخواست برائے بحالی سروس

جناب عالی! کہ حسب ذیل گزارش ہے۔

:- کہ میں ملک ایجوکیشن میں بطور PST عارضی طور پر مورچ 28/5/2010 کو تعیناتی ہوئی۔ اور میں اپنی ڈیوٹی اٹھن طریقے سے سرانجام دیتی رہی۔

:- یہ کہ اس دوران اضرار میں مختلف آسامیوں میں متعلقہ اشتہار آیا۔ جس میں D-17 کے آسامی کیلئے درخواست جمع کیا اور ٹیسٹ اور انٹرویو کے بعد مجھے بطور مورچ 18.01.2013 کو D-17 کی آسامی پر تعینات کیا گیا۔

:- یہ کہ بعد از تعیناتی میں نے باقاعدہ طور پر ڈیوٹی شروع کی۔ اور مجھے میرا سروس بک بھی جاری کیا گیا۔ لیکن شروع سے ہی میری انتہاء بند ہے۔ جس کیلئے میں کئی مرتبہ اپنے عملے سے رجوع کیا لیکن مجھے کوئی تسلی بخش جواب نہ مل سکا۔ جس پر میں نے اچھائی کورٹ کراچی میں اپیلیشن جمع کیا۔

:- یہ کہ دوران اپیلیشن مجھے Terminate کیا گیا۔ جو کہ آرڈر مورچ 11.12.2015 کو کیا گیا ہے۔

لہذا آپ صاحبان سے درخواست ہے کہ مجھے تمام گزشتہ تنخواہوں کے ساتھ ہی مل کر نہ بے اطمینان صادر فرمائیں۔

التعمیر 18.12.2015

شہباز علی  
معالقہ ڈی۔ ایم

Attest  
[Signature]



**VAKALATNAMA**

IN THE COURT OF KPK Service Tribunal Peshawar

OF 2016

Shamim Bibi

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Department

(RESPONDENT)  
(DEFENDANT)

I/We Shamim Bibi

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2016



CLIENT



**ACCEPTED**

**NOOR MOHAMMAD KHATTAK  
(ADVOCATE)**

**OFFICE:**

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal No: 305/16  
Mst: Shamen Bibi Bk - DM  
GMS Dogar VERSUS Mst: Nam Afly ..... Appellant.

1. Additional Chief Secretary FATA Secretariat Warsak Road Peshawar.
2. Director Education FATA Secretariat Peshawar.
3. Additional Agency Education Officer Lower & Central Kurram Agency
4. The Agency Account Officer Kurram Agency..... Respondents.

**Para-wise comments on behalf of respondent No: 2 & 3**

**Respectfully Sheweth:**

**Preliminary Objections**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law.

**On Facts:**

1. Correct to the extent that advertisement was stated for different categories of post by Agency Education Officer, but the candidates applied were not eligible, as on various complaints inquiry was conducted and anomalies were found in the recruitment process.
2. Correct to the extent that appointment orders were issued to the petitioners and other candidates, but the respondents Department legally intervened and constituted search committee to trace out bogus degree holders, therefore, the committee submitted its report clearly picked out those candidates who had applied through fake/bogus degrees, report of search committee attached as (Annexure-A).
3. No comments. Subject to record.
4. The respondent department in order to investigate/inquire the anomalies carried out in recruitment process in Kurram Agency held inquiries and constituted search Committee. It is pertinent to mention here that the responsible Officer was charge Sheeted and proposed to the Government for necessary action under E&D rules. However the salaries of those candidates whose degree's/certificates were verified by the over-sight committee were ordered to be initiate against all those involved in fakism and forgery, copy of letter annexed as (Annexure-B) also a letter No. 12229-36 dated 07/12/2015 was addressed to Additional Agency Education Officer, Lower and Central Kurram Agency for the release of salaries of eligible candidates and terminate in-eligible candidates, copy of letter attached as (Annexure-C).
5. No comments. As explained in Para No.4 above.
6. No comments. As explained in Para No.4 above.
7. No comments. Pertains to record.

**Grounds:**

- A. Incorrect. Respondent has not taken any action which is against Law & facts.
- B. Incorrect. Respondents have acted according to law/policy as the appellant was wrongly appointed, therefore their appointment was liable to struck down under the law.
- C. As explained in Para-B above.
- D. No comments. As stated above in Para-B.
- E. Incorrect. As explained in Para-D above.

					Dogas No-2	excess in sub divisional quota
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Terminated due to excess  
 of professional quality  
 documents not provided  
 by the candidate  
 Having no DM certificate  
 & having provided DM  
 degree for verification  
 Having no DM certificate  
 & has not provide DM  
 degree for verification  
 Having no DM  
 certificate/diploma  
 DPE diploma found false  
 & bogus  
 DPE diploma found false  
 & bogus  
 DPE diploma found false  
 & bogus  
 Having no professional  
 documents  
 Having no professional  
 documents & having  
 Kinnara certificate holder  
 while she was appointed  
 in Central Kurram, also  
 appointed in T-1 LEI with  
 appointment in T-1 LEI  
 (to be on probationary/)  
 enquiry.

Failed in typing test as  
 per advertisement &  
 requested by enquiry  
 officers.

77

Agency Education Officer  
 Lower & Central Kurram, Saidu.

- Copy for information to:-
1. Director of Education FATA Peshawar.
  2. Political Agent, Kurram Agency.
  3. Additional Political Agent, Kurram Agency.
  4. Agency Account Officer, Kurram Agency.
  5. Assistant Political Agent, Kurram.
  6. Assistant Political Agent, Central Kurram.
  7. Principals/Headmasters concerned for similar action.

Agency Education Officer  
 Lower & Central Kurram, Saidu.

17	Bibi Sakina	Haji Gul Akbar	CT	9	GGMS tabi Khonikhel	Terminated due to excess in sub divisional quota
18	Samreen Sadaf	Haji Amin Khan	DM	9	GGMS Tarali	Documents not provided for verification
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21	Bibi Jamila	Khan	DM	9	GGMS tabi khonikhel	Having no DM certificate / Diploma
22	Sajid Rahman	Haji Haider Khan	PET	9	GMS DAPA	JDPE diploma found fake & bogus
23	Zia ul Alam	Noor Alam	Pet	9	GMS Khazccena	JDPE diploma found fake & bogus
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai	JDPE diploma found fake & bogus
25	.....	Mr. Jehan	PET	9	GMS Kunal Baza	Having no professional documents
26	Zar Taj Bibi	Haji Anmir Khan	Pet	9	GGMS Ossai	Having no professional documents & lower Kurram domicile holder while she was appointed in Central Kurram also appointed ...
27	Sajid Rehman	Said Adam Khan	I/C	7	GHS	Has been expelled by pa enquiry
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatoo	Failed in typing test as per advertisement & rejected by enquiry officers.

Add. Agency Education Officer  
Lower & Central Kurram Sadda.

No 2987-93 /Edu dated 11-12-2015

Copy for information to the: -

1. Director of education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency
4. Agency Account Officer Kurram Agency.
5. Assistant political agent Lower Kurram
6. Assistant Political Agent Central Kurram.
7. Principals/ Headmasters concerned for similar action

Add: Agency Education Officer.  
Lower & Central Kurram Sadda



2

(1 B)

ineligible  
Candidates

FATA SECRETARIAT  
DIRECTORATE OF EDUCATION  
WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE: 091-9230166 FAX: 091-9210216

NO. ....  
DATED .../.../2015 E-7-6 MEETING FILE NO

Most Urgent.

14

To: The Additional Agency Education Officer  
Lower & Central Kurram Agency

Subject: RELEASING OF PAY/SALARIES OF FRESH APPOINTEES,  
APPOINTED DURING 2012-13.

Memo: Please refer to this Directorate Memo.No.1446 dated  
13/12/2014, addressed to Agency Accounts Officer Kurram Agency.

Consequent upon the recommendations of oversight  
committee, constituted by the competent authority, I am directed to inform  
you to release the salaries of eligible candidates appointed during 2012-13  
by your office as per enclosed lists attached duly signed by the over sight  
committee members and terminate in-eligible candidates as per lists  
attached with effect from the date of their appointments and if salaries paid to  
them be recovered from them accordingly.

<sup>sel</sup>  
Deputy Directress (Estab)

Endst.No. 12228-36

Dated 7/12 2015

Copy to;

1. Political Agent Kurram Agency with the request to take action against the candidates as per enclosed lists appointed on fake documents as per rules.
2. Agency Education Officer Kurram Agency.
3. Deputy Director (F/A) local Directorate.
4. Deputy Secretary Law & Order FATA Secretariat.
- ✓ 5. Assistant Director (Litigation) local Directorate.
6. PS to secretary AI&C FATA Secretariat.
7. PS to Secretary SSD FATA.
8. P.A to Director Education, FATA.

2

Deputy; Directress (Estab)



No. 10118

DATED 30/9/2015 E-7-6 MEETING FILE KC

To

The Political Agent  
Kurram Agency

Subject:

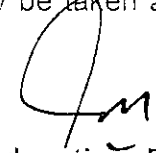
APPOINTMENT MADE BY MR. MOEEN GUL AAEO; AEO  
LK/CK.

Memo:

I am directed to refer to your letter No.5733 dated 30-4-2015 on the subject noted above and to state that on the recommendation of oversight Committee, the competent authority is pleased to dispose of instant case as under.

1. Being Appellate authority, the Political Agent concerned may dispose with the services of the ineligible candidate's initiate criminal cases against these appointees on fake documents and recover the salaries from them (list attached).
2. The eligible candidates may be retained and their salaries be released (list attached).

You are therefore requested that action may be taken at your end under intimation to all concerned.

  
o/c Director Education, FATA

Endst.No. 10119-25  
Copy to;

Dated 30/9 2015

1. Agency Education Officer Kurram Agency at Parachinar.
2. Deputy Secretary Law & Order FATA Secretariat.
3. Deputy Director (F&A) local Directorate.
4. PS to Secretary F&A FATA Secretariat.
5. Additional Agency Education Officer Lower/Central Kurram.
6. PS to Secretary SSD FATA.
7. PA to Director Education, FATA.

  
o/c Deputy Directress (Estab)

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

APPEAL No. 305 /2016

*SHAMIM BIBI*

VS

EDUCATION DEPTT:

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE**  
**TO THE REPLY SUBMITTED BY THE RESPONDENTS**

**R/SHEWETH:**

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

**ON FACTS:**

- 1- Admitted correct the extent of advertisement which was published in the Daily Newspaper advertised various posts while the remaining para is incorrect. That appellant having Domicile of Kurram Agency and the requisite qualification applied for the said post and after participation in the test and interview the appellant was declared successful in the said selection process. That after completion of selection process the appellant was appointed vide appointment order dated 18.01.2013. That in response of the said appointment order the appellant submitted his charge report and started performing his duty at the concerned station quite efficiently and up to the entire satisfaction of his superiors. That no complaint whatsoever has been received during the entire service of the appellant and appellant had regularly performed his duty.
- 2- Admitted correct to the extent of appointment order of the appellant while the remaining Para is incorrect. That after appointment salaries of the appellant withheld by the respondent Department without assigning any reason while the appellant was regularly performing his duty. That at the time of appointment the appellant submitted original educational documents but the respondent No.3 malafidely terminated the appellant.
- 3- Needs no comments.
- 4- Incorrect and misconceived. That the respondent Department inquire/verified the educational documents of the appellant from the concerned Board/University which

were found clear. That inspite of that the respondent Department withheld the salaries of the appellant. That appellant time and again approach the concerned quarter for release of his salaries but no response has been given by the concerned authority. That feeling aggrieved finally the appellant knocked the door of the august Peshawar High Court Peshawar in writ petition No. 3602-P/2014 for release of his salaries but during the pendency of the said writ petition the Additional Agency Education Officer, Lower and Central Kurram Agency terminated the services of the appellant without conducting regular inquiry in the matter.

- 5- Incorrect and not replied accordingly hence denied.
- 6- Incorrect and not replied accordingly hence denied.
- 7- Need no comments.

**GROUND:**  
**(A to D):**

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect, baseless and not in accordance with law and Rules hence denied. That appellant has been appointed in light of the appointment, promotion and transfer Rules 1989 and as such proper advertisement has been issued for the said post of appellant but inspite of that the respondent No.3 without any reason issued the impugned order dated 11.12.2015. That the respondent department acted in arbitrary and malafide manner while issuing the impugned order dated 11.12.2015 and the respondent Department had not adopted the codal formalities before issuing the impugned termination order. Moreover as per Supreme Court Judgments regular inquiry is necessary before taking punitive action against the civil servants:

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

**APPELLANT**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**



ENQUIRY REPORT

1. Introduction

In pursuance of Directorate of Education Endst No. 5191-99 dated 09-04/2013 forming a committee-consisting of the undersigned and impartial enquiry was conducted as desired.

2. Background

The political gent kurran agency has requested to look in to the matter of appointments of agency cadre post in central Kurram with the observation that Addl. AEO has made appointment in violation of approved policy and various official notifications.

3. Procedure

The committee visited the office of the Addl. AEO Sadda Lower and Central Kurram on 06/05/2013 discussed the issue with the current Addl AEO and EX Addl AEO, checked all the available record appointment orders, documents of the candidates, interview and merit lists-singed by the DSC. Details are given below.(ann A+B)

4. Findings

- i. Appointment order (female) indifferent teachings cadres.
  - I CTS CK Total No. 8 vide Endst no. 143-55 dated 15/01/2013
  - ii Do i.k Total no 2 vide no 234-42 dated 18/1/2013
  - iii DMs Ck Total no. 4 vide Endst no. 125-33 dated 10/01/2013
  - iv Do ik Total no. 01 vides Endst. No. 261-68 dated 18/01/2013
  - v Pets Ik Total no. 01 vides Endst. No. 202-207 dated 15/01/2013 (ann c)

ii. Non teaching staff

Lab assistant vide ends no. 278-80 dated 18-01-2013 (Aann D)

iii. appointment order male in deferent teaching cadres

- i. CTs. CK total no. 17+1=18 vide Endst No. 156-77 dated 15-01-2013 and vide Endst no. 392-96 dated 21-01-2013
- ii cts lk total no. 6+1=7 vide Endst no 221-33 dated 18-01-2013
- iii dms ck total no. 3 vide Endst no. 134-42 dated 15-01-2013
- iv dm lk total no.1 vic Endst no. 233-60 dated 18-01-2013
- v. pets ck total no. 4 vide Endst no. 193-201 dated 15-01-2013
- vi. Pets lk total no. 3+1 vide Endst no. 253.52 dated 18-01-2013 And vide Endst no. 382-86 dated 21-01-2013 (Ann c)

iv. Non teaching staff male

- i. jc ck total no. 3vide Endst no. 178-85 dated 15-01-2013
- ii. jc lk total no. 3+1 vide Endst no. 287-96 dated 18-01-2013 and Endst no. 377-81 dated 21-01-2013
- iii. Lab asstt. Ck total no. 02 vide Endst 186-92 dated 15-01-2013.
- iv. Lab asstt. Total no. 02+1 vide no. 269-77 dated 18/01/2013 and Endst 372-76 dated 21-01-2013
- v. Pesh imam.lk-total No. 1 vide Endst 297-304 dated 18-01-2013.

Total no. of appointment (F&M teaching and non teaching) 18+50=68

The total No of appointments made under  
political Agent Kurram Agency vide this Office Memo dated  
08/03/2013.

After thoroughly checking the Interview list, Merit list, Advertisement  
appointment orders it was found that all the appointments were  
according to the unapproved prescribed policy of the Khyber Pakhtunkhwa  
however some irregularity and violation were also observed which are  
below:-

35

2-Male

1. Majeed Noor S/O Pto Noor, on the top of CT Merit list, but have no real  
qualification, has been appointed against irregular CT post. He has a certificate  
CT General Course. He was appointed because of non-availability of CT  
with prescribed qualification.
2. Muhammad Aziz S/O Syal Khan appointed in advance against a CT post of  
going to be vacated in future after the retirement of GMS Khan CT GMS  
LX.
3. Khalid S/O Mir Jahan, appointed against PET post at GMS Khan. Basis on the  
of discharge certificate.  
Muhammad Afraz Khan S/O Salam Khan appointed against GMS Khan. Basis on the  
basis of computer skill. (Amir Khan)

3-Female Central Kurram (DMS)

Only one candidate merit position 1 is qualified with relevant prescribed  
qualification but the other three candidates appointed on the basis of  
relevant subject in the SSC. No such provision exists in the Policy or advertisement.  
Zameer Bibi D/o Ameer Khan Merit position No.9, appointed as PET at GMS  
on the basis of his religious sect as usual practice but she does not have  
prescribed qualification and is untrained. Merit Position No.3 and 4 in  
it was mentioned in advertisement that vacancies will be filled up after the  
service teacher's promotion as per prescribed policy. But the share of the  
without sharing their due share. (Amir Khan)

4-Approval of the merit list

As far as the approval of merit list from the competent authority is concerned  
then Addl AEO concerned had submitted to the Secretary SSO vide letter no  
dated 15-01-2013. According to him, he was verbally directed to proceed to  
make appointments. A copy of each appointment has also been sent to  
directorates for information, but the local directorates has not raised  
observations against these appointments which amount to tacit approval.

5-IGNORANCE OF SHEIA CANDIDATES:

As far as Shia Community of lower Kurram is concerned the Addl AEO have received  
their applications in different teaching and non-teaching cadre and have  
included in the interview and merit list prepared by the DSC Education  
Department Lower Kurram and some of them have been appointed as per  
practices and conditions prevailing in the Agency. The purpose of these

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After thoroughly checking the interview list, merit list, advertisement appointment orders it was found that all the appointments were according to the unapproved prescribed policy of the Khyber Pakhton khwa however some irregularity violation were also observed which is below.

### 2 Male.

1. Mujeeb Noor S/o Pio Noor, on the top of CT merit list, but have qualification has been appointed against technical or post he has acc general course. He was appointed because to non-availability of prescribed qualification.
2. Muhammad asif s/o siya kha appointed in advance against a ct post to be vacated in jun/july after the retirement of gulabjan ct GHS I.k
3. kifayat s/o mir jehan appointed against pet post at GMS kamal zaba discharge certificate
4. Muhammad alam khan s/o salam kha appointed GHS maheezai I.k computer skill (ann E&F)

### 3 Female central Kurram (DMs)

- i. only one candidate merit posting 1 is qualified with relevant qualification but the other three and dates appointed on the relevant subject in the SSC. No such provision exists in the advertisements.
- ii. Zartaj bibi D/o ameer khan merit position no. 9 appointed at GGMS c.k on the basis of his religious seat practice but she full prescribed qualification and it untrained. Merit position 1 to trained but ignored on the basis to being shia. (as mentioned
- iii. It was mentioned in advertisement that all vacancies will be after service teacher's promotion as per prescribed policy. But of the service teacher has completely been ignored and all have been fill without sparing their due share ann-G

### 4 approval of the merit list

As for as the approval of merit list from the competent authority then Addl- AEQ concerned had submitted to the Secretary SSD vide dated 15-01-2013. According to him he was verbally directed to pro appointments. A copy of each appointment has also been send to director information, but the local directorate has not raised observation against appointment which amount to tacit approval.

### 5 ignorance of sheia candidates

So far Shia community of lower Kurram is concerned the Addl- AEQ received their applications in different teaching and non-teaching categories been included in the interview and merit list prepared by the DS Department lower Kurram and some of them have been appointed as per and traditions prevailing in the agency. The purpose of these practices

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and traditions have been termed corrupt the absence of improvement of education. It is further clarified that the area where the sectarian issue is not serious Shia and Suni have been appointed according to normal merit list which is evident from the appointment orders. Moreover, the AEO concerned has requested the AEO upper Kurram at Peshawar to provide the names of such candidates of lower Kurram belonging to Shia community who applied at Upper Kurram to proceed further in the matter vide letter No.3771 dated 29/12/2012 and subsequent reminder no.35 dated 04/01/2013 but in vain at the end of AEO concerned (Annex I)

Recommendations Conclusions

All appointments have been made according to the policy but share of in service teachers has not been spared for them due to the failure of the Department to fulfill quota for female/legally qualified teachers. However, Unemployed and DM teachers have been appointed which is in conformity to advertisement policy but the AEO has of the view that he has no authority according to National Education Policy of 2009 which prescribes qualifications for the less developed and backward areas provided the qualified candidates are not available in Para 2 sub sections II Muhammad Aisi S/G and appointment order in advance vide order No.377-01 dated 21-01-2013 against CT Post and all Para female and PETS female who are untrained vide Para 2 sub section (i) and (ii) may be cancelled.

Dates:

- i. Muhammad Aisi S/G
- ii. Perveen Bibi S/O Sponson
- iii. Fajl Jamila S/O Muhammad Khan

Vide order No. 35 dated 01/01/2013

PETS:

- i. Zarraji Bibi S/O Haji Ameer Khan vide order No.202-207 dated 15-01-2013
- ii. Hafayat S/O Mir Jehan Serial No at 4 vide order No. 193-201 dated 15-01-2013 appointed against PET and Muhammad Amani Khan S/O Sulam Khan vide order No.377-01 dated 21-01-2013 discharge certificates and computer certificate respectively and authenticity of the institutions and equality of discharge certificate may be verified from the quarter concerned.

OR

5- If the Competent Authority is not satisfied and agrees with our

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And traditions have been to discourage the absenteeism for the improvement of education. It is further clarified that the area where the sectarian issue is not serious shia and suni have been appointed according to normal merit list which is evident from the appointment orders, moreover, the Addl. AEO concerned has requested the AEO upper Kurram at Parachinar to provide the names of such candidates of lower Kurram belonging to shia community who applied at upper Kurram to proceed further in the matter vide letter No. 3771 dated 28-12-2012 and subsequent reminder no. 33 dated 04-01-2013 but in vain at the end of AEO concerned (Ann:I)

#### Recommendations conclusions

1. All appointment have been made according to the policy but share of in service teacher has not been spared for them due to the failure of the Department to fulfil codal for militias legal requirement time moreover untrained pet and dm teacher have been appointed which is to advertisement and policy but the AEO has of the view that he has according to national Education policy of 2009 which relax prescribed qualification for the less developed and backward areas rovided the qualified candidates are not available.
2. Para 2 subsections Muhammad asif s/o sial khan appointment order in advance vide Endst no. 387-91 dated 21-01-2013 against ct post and all dms female and pets female whoa re untrained vide para 3 subsection (i) and (ii) may be cancelled.

#### DMS.

- i. Shamim bibi D/O speen Gul
- ii. Serveen bibi D/o spcn gul
- iii. Bibi jamila D/o niaz bahadar khan

Vide Endst no. 125-33 dated 15-01-2013

#### PETs.

- i. Zartaj bibi D/o Haji Ajmeer khan vide Endst NO. 202-207 dated 15-01-2013.
- ii. Kifayat S/o mir Jehan Serical No. at r vide Endst no. 193-201 dated 15-01-2013 appointed against pet and Muhammad alam khan s/o salam khan vide Endst no. 377-81 dated 21-01-2013 discharge certificates and computer certificate respectively and euthenics of the institutions and equality of discharge certificate may be verified from the quarter concerned

Or

5. If the competent authority is not satisfied and agrees without.

Tuesday, may 28, 2013

Thursday, May 28, 2013

DATA (MRE)

Submitted on 05/28/2013

Director of Education

*[Handwritten signatures and illegible text]*

question mark

...of the ...

...the ...

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RECORD

Findings/recommendations it is proposed that review committee may be constituted under the chairmanship of Addl: AEO Lower Kurran including a representative of directorate of Education FATA to review the whole process and prepare the revise merit list according to the policy and advertisement in the interest of public service.

Note: legal validity of selection criteria provided to the Addl AEO (c) without prior approval of competent Authority is itself raise a big question mar.

**Enquiry Committee**

**Asmat Khan Principal  
GHSS Samma Badhabera FR  
Peshawar**

**Shah Zarkhan  
Dy. Direcot  
(M&E) FATA directorate of Education**

Submitted on 28/5/2013