

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 16.3.2015 which was not responded and hence the instant service appeal on 13.7.2015.

That the appellant was given no opportunity of hearing nor the inquiry was conducted in the prescribed manners and major penalty in the shape of dismissal from service was passed which penalty is against facts and law.

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

  
Chairman  
Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Representative submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant has been reinstated in service.

In the light of the said application, learned counsel for the appellant requested for withdrawal of the appeal as the grievances of the appellant have been redressed.

Dismissed as withdrawn. File be consigned to the record room.

  
Chairman  
Camp Court A/Abad  
20/10/15

ANNOUNCED  
20.10.2015



Appellant Deposited  
Security & Process Fee



Form- A  
FORM OF ORDER SHEET

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

Case No. 803/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13.07.2015	<p>The appeal of Mst. Rasheeda Bibi presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	14-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

*Appeal no. 803/2015*

Mst. Rashida Bibi d/o Muhammad Daud W/O waqar Younas  
GGPS, Chapra Bala R/o Lasan Nawab Tehsil & District Mansehra (PST)

.....Appellant

**VERSUS**

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

.....Respondents

**INEX**

S.No	Prescription of Document	Annexure	page
1	APPEAL		1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12-23
4	Copy of appointment order and corrigendum	"C"	24-28
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	28-30
6	Copy of impugned dismissal order of appellant	"E"	31
7	Copy of departmental appeal /representation	"F"	32-35
8	Wakalatnama		38-40

Dated: *9/7*/2015

*Rashida*

Appellant

Through

*Muhammad Arshad Khan Tanoli*

Advocate, High Court

Abbottabad

(7)

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

Appeal no. 803/2015

A.W.F. Province  
Service Tribunal

Diary No. 843

Dated 13-7-2015

Mst. Rashida Bibi d/o Muhammad Daud W/O waqar Younas  
GGPS, Chapra Bala R/o Lasan Nawab Tehsil & District Mansehra

.....Appellant

**VERSUS**

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

.....Respondents

**SERVICE APPEAL.**

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

Respectfully Sheweth,

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

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

Copy of Advertisement is annexed as Annexure "A"

13/7/15

2

2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, F.A/F Sc PTC with extra qualification. **Copies of Documents/testimonial are annexed as Annexure "B"**
  
3. That, following this, the appellant was appointed as PST Teacher in respondents' Department on the basis of merits and was posted in GGPS vide appointment order endrst No 5360-5384/ Estt ; PST 2011/2012 Mansehra Dated 18.5.2012. **Copy of appointment order and is annexed as Annexure "C"**.
  
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 18.5.2012 onwards.
  
5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 2016-25/AE /ESTB on 3.3.2015.
  
6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi and DEO, Shamim Akhtar was found attached with the show cause notice, wherein

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

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of PST Teacher and appeared in ETTA of the merits list and thereafter was appointed on merit Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their requisite qualification from recognized Institution to be appointed "as per service structure in prescribe rules the requisite qualification against the vacant post of PST Teacher is taken into consideration and thereafter appointment made on merit.
8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order

8      ④

endst. No 2016-25/AE /ESTB dated 03.03.2015. **Copy of impugned dismissal order of appellant is attached as annexure "E".**

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 16.3.2015. **Copy of departmental appeal /representation is attached as annexure "F"** but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

### **GROUND**

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

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



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

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

7

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

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

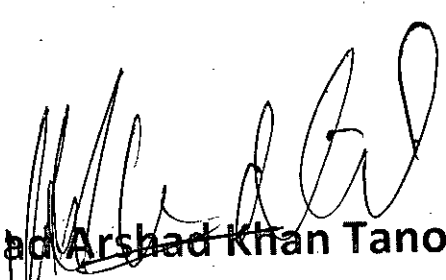
It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 2016-25/AE /ESTB dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc. Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 20/2/2015

Rashida

Appellant

Through

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

8

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

Mst. Rashida Bibi d/o Muhammad Daud W/O waqar Younas  
GGPS, Chapra Bala R/o Lasan Nawab Tehsil & District Mansehra

.....Appellant

**VERSUS**

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

.....Respondents

**APPLICATION FOR SUSPENSION**  
**OF IMPUGNED ORDER NO 2016-**  
**25/AE /ESTB AND GRANT OF STATUS**  
**QUO TILL FINAL DISPOSAL OF THE**  
**MAIN APPEAL .**

Respectfully Sheweth,

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

(10)

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

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

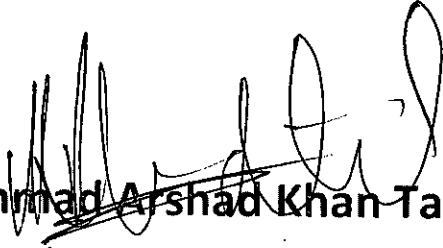
It is, therefore, very humbly prayed that on acceptance of the instant application, impugned termination order dated 03.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: 19/7/2015

Rashida

Appellant

Through

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

(10)

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

Mst. Rashida Bibi d/o Muhammad Daud W/O waqar Younas  
GGPS, Chapra Bala R/o Lasan Nawab Tehsil & District Mansehra

.....Appellant

**VERSUS**

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

.....Respondents

**AFFIDAVIT**

I, Mst. Rashida Bibi d/o Muhammad Daud W/O waqar Younas GGPS, Chapra Bala R/o Lasan Nawab Tehsil & District Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

*Rashida*

Dated: 9/7 /2015

Deponent

R-11  
Annex  
A

حکومت پاکستان کی وزارت تعلیم و تہذیب و ثقافت

وزیر تعلیم و تہذیب و ثقافت، اسلام آباد  
 11-Gharbani Road، 2011-2012 کے ذریعے (2011-2012) کے لیے (2011-2012) کے لیے (2011-2012) کے لیے  
 ADP No. 102 (2010-11) کے تحت (2010-11) کے تحت (2010-11) کے تحت

سلسلہ	تاریخ	موضوع	مقام
1	2011-2012	...	...
2	2011-2012	...	...
3	2011-2012	...	...
4	2011-2012	...	...
5	2011-2012	...	...
6	2011-2012	...	...
7	2011-2012	...	...
8	2011-2012	...	...
9	2011-2012	...	...
10	2011-2012	...	...

Pre Bid Meeting

Pre Bid Meeting کے لیے 11:00 بجے 31-5-2011 کو برت 11:00 بجے 31-5-2011 کو برت 11:00 بجے 31-5-2011 کو برت  
 11:00 بجے 31-5-2011 کو برت 11:00 بجے 31-5-2011 کو برت 11:00 بجے 31-5-2011 کو برت

- 1) بیڈنگ کے لیے درخواستیں 31-5-2011 تک 11:00 بجے 31-5-2011 کو برت 11:00 بجے 31-5-2011 کو برت
- 2) ...
- 3) ...
- 4) ...
- 5) ...
- 6) ...
- 7) ...
- 8) ...
- 9) ...
- 10) ...
- 11) ...

0937-870861 فون نمبر

سلسلہ	تاریخ	موضوع	مقام
1	2011-2012	...	...
2	2011-2012	...	...
3	2011-2012	...	...
4	2011-2012	...	...
5	2011-2012	...	...
6	2011-2012	...	...
7	2011-2012	...	...
8	2011-2012	...	...
9	2011-2012	...	...
10	2011-2012	...	...

1) ...  
 2) ...  
 3) ...  
 4) ...  
 5) ...  
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 7) ...  
 8) ...  
 9) ...  
 10) ...

www.pec.edu.pk

Accepted  
 Muh...  
 Dist: C

# Allama Iqbal Open University Islamabad

Serial No 1842930



Annex B

P-12

Certified that *Ms/Ms* **RASHIDA BIBI**  
Son/Daughter of **MUHAMMAD ZAHOOR**  
Registration No **06-NMA-0273** Roll No **T-632164**  
Semester **AUTUMN 2006** having met all the requirements

under the semester system is this day awarded the

## Primary Teaching Certificate

He/She has secured **06 %** marks  
and has been placed in **B** grade

*M. A. Raza*  
Muhammad Arshad Khan  
Distt: GURUAS ANSARI



Result declared on: **September 20, 2007**

Date of issue: **September 09, 2008**

*H. M. Khan*  
Controller of Examinations

Note: This certificate is issued without alteration/erasure.  
The detail of courses is overleaf.

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
613	Principles of Education	58
614	Educational Psychology	68
615	School Organization and Management	68
616	School Community and Practical Arts	59
617	Teaching of Urdu	61
618	Teaching of Mathematics	67
619	Teaching of Science and Physical Education	64
620	Teaching of Islamiat and Social Studies	65
811	Practical Workshop and Teaching Practice	85

Total credit hours

XXX

Obtained / Total marks

593 / 900

Total credits AIUO

5 Full Credits

Cumulative grade point average

XXX

First semester:

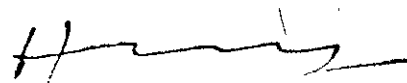
SPRING 2006

Final semester

AUTUMN 2006

Grading Scheme

80% and above:	A+ grade
70% to 79%	A grade
60% to 69%	B grade
50% to 59%	C grade
40% to 49%	D grade
Below 40%	Fail



Controller of Examinations





# HAZARA UNIVERSITY MANSEHRA



P-14

PAKISTAN

## PROVISIONAL CERTIFICATE

10911 SESSION S. 2008  
Serial No 14386 Registration No 0455MFPX.BA7  
Roll No 20048 Result Declared on: 3-2-2009

Certified that Mr. / Miss. / Mrs. RASHIDA BIBI

Son / Daughter of MUHAMMAD ZAHOR

student / candidate of BA has passed the BA

Examination held in Nov. 2008 by securing 207 Marks out of 550

and has been placed in THIRD Division / Grade / C.G.P.A

(The Examination was taken as a whole / in parts)

Prepared by: [Signature] 30/1/2012  
Checked by: [Signature]  
Controller of Examinations  
Hazara University

Muhammad A. Farooq  
Advocate  
Distt. Courts Abbotabad



# HAZARA UNIVERSITY

SNo: 8066

MANSEHRA, NWFP, PAKISTAN

## DETAILED MARKS CERTIFICATE

BA ANNUAL 2008

P-15

Roll No: 42471

Registration No: 0455MFPX-BA7

Student's Name: Rashida Bibi

Father's Name: Muhammad Zahoor

Institution/District: Mansehra

Part: First

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. English Compulsory	75	26	Twenty-Six	Pass
2. Islamiyat Compulsory	60	21	Twenty-One	Pass
3. Islamic Studies	75	25	Twenty-Five	Pass
4. Urdu	75	29	Twenty-Nine	Pass

Total: 285

Percentage: 35.44%

Checked by:

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

Controller Examinations  
Hazara University, Mansehra  
August 20, 2008

Attested  
*[Signature]*  
Mansehra District Court  
Distt: Courts Abbottabad



# HAZARA UNIVERSITY

SNo: 5794

MANSEHRA, NWFP, PAKISTAN

## DETAILED MARKS CERTIFICATE

P-16

BA SUPPLEMENTARY 2008

Roll No: 20848

Registration No: 0455MFPX-BA7

Student's Name: Rashida Bibi

Father's Name: Muhammad Zahoor

Institution/District: Mansehra

Part: Second

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. Part 1 Marks	285	101	One Hundred & One	Pass
2. English Compulsory	75	25	Twenty-Five	Pass
3. Pakistan Studies	40	17	Seventeen	Pass
4. Islamic Studies	75	39	Thirty-Nine	Pass
5. Urdu	75	25	Twenty-Five	Pass

Total Marks: 550  
 Percentage: 37.64  
 Division: Third

Checked by:

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

Controller Examinations  
 Hazara University, Mansehra  
 February 03, 2009

*Muhammad Arshad Khan*  
 Distt. Courts Abbottabad

ADS No. 065606

Roll No. 14462

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



P-17

Abbottabad N.W.F.P. - Pakistan  
HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE  
SESSION SUPPLEMENTARY 2005  
Humanities Group

This is to certify that RASHIDA BIBI  
Daughter of MUHAMMAD ZAHOOR  
A candidate from MANSEHRA DISTRICT  
has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in November 2005 as a Private Candidate. She has obtained 459 marks out of 1100 and has been placed in Grade D Representing FAIR.

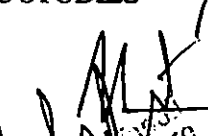
The Examination was taken as a Whole/In Parts and the candidate passed in the following subjects:

- |                    |           |                         |
|--------------------|-----------|-------------------------|
| 1. ENGLISH         | 2. URDU   | 3. ISL. EDU-PAK STUDIES |
| 4. ISLAMIC HISTORY | 5. CIVICS | 6. ISLAMIC STUDIES      |

  
Asstt. Secretary

This certificate is issued without alteration or erasure.

*Attended*

  
Secretary

Mulla  
Court  
Abbottabad

45301

Certificate No: \_\_\_\_\_

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD****Duplicate**Roll No: 14462Group: HUMANITIES**RESULT CARD****HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION****Part - II**Session: 2005 (Supply)**P-18**

Name: RASHIDA BIBI  
 Father Name: MUHAMMAD ZAHOOR  
 Institution/  
 District: MANSEHRA

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of Nov/Dec as a Private Candidate

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	35	--	44	--	79	Seventy-Nine
Urdu (Comp)	200	43	--	61	--	103	One Hundred Three
Islamic Education	50	22	--	--	--	22	Twenty-Two
Pakistan Studies	50	--	--	20	--	20	Twenty Only
Islamic History	200	37	--	33	--	70	Seventy Only
Civics	200	33	--	41	--	74	Seventy-Four
Islamic Studies	200	45	--	46	--	91	Ninety-One
<b>Total : 1100</b>						459-D	Four Hundred Fifty-Nine Only
Remarks :							

Date : 23-August, 2008

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

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: [www.biseatd.edu.pk](http://www.biseatd.edu.pk)

  
 Controller of Examinations

**Attested**  
 \_\_\_\_\_  
 Distt: Courts Abbottabad

D U P L I C A T E

ADA No 120630

Roll No. 5130..

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



P-19

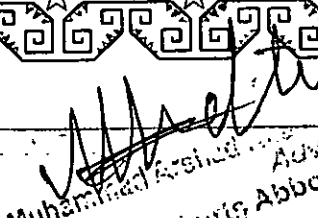
**Abbottabad N.W.F.P. - Pakistan**  
**SECONDARY SCHOOL EXAMINATION CERTIFICATE**  
**SESSION ANNUAL 2002**

This is to certify that RASHIDA BIBI  
Son / Daughter of MUHAMMAD ZAHOOR  
Enrollment No X X X  
A candidate from TAKBEER MODEL P.S LASSAN NAWAB MANSEHRA  
has passed the **Secondary School Certificate Examination** of the Board of  
Intermediate and Secondary Education, Abbottabad held in March 2002 as a  
**Regular / Private Candidate**. He / She obtained 548 Marks out of 850.  
and has been placed in Grade B Representing VERY GOOD  
The candidate passed in the following subjects:  
1. English      2. Urdu      3. Islamiyat      4. Pakistan Studies  
5. Mathematics      6. PHYSICS      7. CHEMISTRY      8. BIOLOGY  
Date of birth according to admission form is THIRTEENTH OF MARCH  
One thousand nine hundred and EIGHTY FIVE (13-03-1985)

  
Asstt. Secretary

This certificate is issued without alteration or erasure.

  
Secretary

  
Muhammad Rashid  
Distt: G. Cantt Abbottabad

53

S. No. ....

Reg No 1629

# TAKBEER MODEL PUBLIC SCHOOL



*Duplicate copy*

## LASSAN NAWAB MANSEHRA PROVISIONAL CERTIFICATE

Certified that Miss/Mrs Rashida Bibi S/O/D/O Muhammad Zahoor  
appeared in S.S.C. Examination 2002 from the  
Board of Intermediate & Secondary Education Abbottabad, held in March, 2002  
under Roll No. 5130 and according to preliminary result statement supplied by  
the secondary B.I.S.E. Abbottabad, has been declared successful obtaining 548 marks  
of the following subject placing in "B" Grade.

- |                |                   |                   |                     |
|----------------|-------------------|-------------------|---------------------|
| 1. English     | 2. Urdu           | 3. Islarnyat      | 4. Pakistan Studies |
| 5. Mathematics | 6. <u>Biology</u> | 7. <u>Physics</u> | 8. <u>Chemistry</u> |

His/Her Date of Birth according to the school record is: 13-03-1985

Ad. No. 48 Enroll No. 448004-2000

Prepared By M. Saleem

Checked By h.

Date of Issue 09-08-2008

*[Signature]*  
Principal  
Takbeer Model Public School  
Lassan Nawab (Mansehra)

Takbeer Model Public School  
Lassan Nawab Mansehra

*[Handwritten signature]*

SG.No. 128924

JARY

Board of Intermediate & Secondary Education  
ABBOTTABAD

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination

(SCIENCE GROUP)

Session 2002 (Annual/Supplementary)



Duplicate

P-21

Name Rashida Bibi

Father's Name Muhammad Zahoor Roll No. 5130

SUBJECT		MARKS OBTAINED	
		In figure	In words
1. English	150	91	Five hundred & forty eight
2. Urdu	150	83	
3. Islamiyat Comp:	75	55	
4. Pakistan Studies	75	38	
5. Mathematics	100	78	
6. Physics	100	70	
7. Chemistry	100	70	
8. Biology	100	63	
Total	850	548	

This certificate is issued. Errors and omission excepted

Prepared by: [Signature]

Checked by: [Signature]

[Signature]

Controller of Examinations  
Board of Intermediate & Secondary Education  
Abbottabad

Dated

23/8/2008

[Signature]  
Muhammad  
Dir. Examinations



# Domicil Certificate

N.W.F.P. DISTRICT

MANSEHRA

Photograph

I declare that I am born of parents who are/were permanently domiciled in **NORTH WEST FRONTIER PROVINCE** having been born/settled in this province.

I was born at Village/Mahallay Lassan Nawab (Nai Abadi)

Tehsil Mansehra District Mansehra Hazara Division

*Rashida*  
Signature of Applicant

Date \_\_\_\_\_

Pursuance to the Declaration date \_\_\_\_\_

Filled by ~~Mr/Miss/Mrs.~~ Rashida Bibi S/D/W/O Muhammad Zahoor

Domiciled in North West Frontier Province, It is here by certified that the said Rashida Bibi is born of parents who are/were/permanent residents of the North West Frontier Province, having been born/settled within it.

I have satisfied myself from <sup>overleaf</sup> ~~Personal~~/my Knowledge verification that the above declaration is true and certify accordingly.

This 13<sup>th</sup> Day of August 2008

Countersigned  
District Officer  
Revenue & Estate

No 9024 Dated 13.8.08  
District Officer  
Revenue & Estate Mansehra

Deputy District Officer  
(Judicial), Mansehra.  
Deputy District Officer  
Revenue & Estate

SULEMAN STATIONERY MART Kashmir Road, Mansehra. Ph:304585

محمد شفیق شیشتری  
Muhammad Shafiq Shishtri  
Advocate  
Dist: Courts Approving

تصدیق کی جاتی ہے دائرہ بندی دفتر محمد ظہور ساکن لسان شکوہی تحصیل و ضلع  
حالہ گورنمنٹ گرلز پرائمری سکول لسان نواب میں زیر تعلیم رہی اسکا  
سلسلہ نمبر 1542 اور تاریخ پیدائش 13/03/1985

Night Bilal  
Head Mistress  
Govt. Girls Primary School  
Manshera District, Punjab

تصدیق کی جاتی ہے کہ سہارا دائرہ بندی دفتر محمد ظہور ساکن لسان نواب موضع شکوہی کی آبادی اجراء  
کی راجسٹی و پیدائشی ہے میں اس کو ذاتی طور پر جانتا ہوں۔

شکیل احمد  
Shakeel Ahmed  
General Councillor  
U/c Lissan Nawab (Manshera)

منہ علیٰ حسب تقریر متعلق احمد نواز مولانا لسان نواب ساکن راستہ اول  
دفتر محمد ظہور ساکن لسان نواب تحصیل و ضلع مانسہرا  
اجراء سے ان کی پیدائشی اور سکونت صحیح دفتر ساکن اجراء  
موضع لسان نواب میں رہا کرتی ہیں

12/08/08

Verified as per report  
of Revenue Staff  
Tehsildar Manshera  
13/8/08

Annex e p-

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSIHERA

ORDER

26

Consequent upon the recommendation of the Departmental Selection Committee District Manshera, the competent authority is pleased to appoint the following candidates as a Primary School Teacher PST (Female) against newly created / resultant vacated posts in their relevant union councils in BPS 7 @ Rs.5800-320-15400 plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect.

U/C BAFFA				
Sr.	Name of Candidate	Father's Name	Home Address/ Domiciled U/C	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	Own UC M/List
2	Sabir	Noor Hussain	Baffa	Own UC M/List
U/C BEHALI				
3	Munaza Daud	Daud	Behali	Own UC M/List
4	Nazma Bibi	R.Khan Bahdar	Behali	Own UC M/List
U/C Battal				
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	Own UC M/List
6	Shaista Jabeen	Muhammad Akbar	Kathai	From Adjacent UCs Merit list
U/C Bherkund				
7	Bushra	Ghulam Mustafa	Bhekund	Own UC M/List
U/C Gari Habib Ullah				
8	Naida Ashraf	Muhammad Ashraf Bag	Gari Habib Ullah	Own UC M/List
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	Own UC M/List
U/C Hilkot				
10	Bibi Asia	Abdul Ghafoor	Hilkot	Own UC M/List
U/C Hangrai				
11	Irum Saeed	Saeed Akhtar	Hangrai	Own UC M/List
12	Mariam Bibi	Muhammad Younis	Hangrai	Own UC M/List
U/C Ichrian				
13	Bibi Sajida	Saeed ur Rehman	Ichrian	Own UC M/List
14	Saima Ara	M.Fareed Khan	Ichrian	Own UC M/List
U/C Jabar Daveli				
15	Muh Jabeen	Muhammad Farooq	Jabar Daveli	Own UC M/List
16	Saba Tariq	Muhammad Tariq	Sachan	From Adjacent UCs Merit list
U/C Jaloo				
17	Sobia Bibi	Abdul Ghafoor	Jaloo	Own UC M/List
18	Saima Naz	Mir Afzal	Jaloo	Own UC M/List
U/C Karnol				
19	Fara Naz	Muhammad Khurshid	Karnol	Own UC M/List
20	Nadia Rehman	Habib ur Rehman	Pairan	From Adjacent UCs Merit list
U/C Karori				
21	Amrin Younis	Muhammad Younis	Karori	Own UC M/List
22	Musrat Bibi	Khalil ur Rehman	Karori	Own UC M/List
23	Zenab	Alan Zeb	Karori	Own UC M/List
24	Amrin Kusar	Muhammad Miskeen	Karori	Own UC M/List
25	Rukhsana Taj	Taj Muhtammad	Karori	Own UC M/List
26	Rifat Bibi	Faqeer Muhammad	Shanaya	From Adjacent UCs Merit list
27	Ashiya	Misri Khan	Shanaya	From Adjacent UCs Merit list
28	Razia Bibi	Muhammad Zaman	Darbānd	From Adjacent UCs Merit list

Muhammad  
District

Muhammad

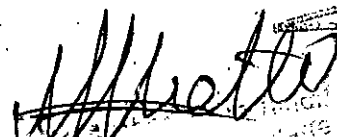
30	Sobia Arshad	Muhammad Arshad	Lassan Nawab	Own UC M/List
	Rashida Bibi	M.Zahoor	Lassan Nawab	Own UC M/List
U/C Mohandari				
31	Bibi Naseema	Ghulam Nabi	Mohandari	Own UC M/List
U/C Nika Pani				
32	Yasmeen Wahab	Abdul Wahab	Nika Pani	Own UC M/List
33	Nesiam	Abdul Latif	Darband	From Adjacent UCs Merit list
U/C Perhinna				
34	Lubna Younis	M. Younis	Perhinna	Own UC M/List
35	Zahida Bano	Ali Zaman	Perhinna	Own UC M/List
U/C Phulra				
36	Bibi Saleha	Abdula Jan	Phulra	Own UC M/List
37	Mehnaz Bibi	M. Iqbal	Phulra	Own UC M/List
38	Bibi Mewash	M. Navced	Phulra	Own UC M/List
39	Farzana Yousaf	M. Yousaf	Phulra	Own UC M/List
40	Bibi Farah	Khurshid Khan	Sawan Maira	From Adjacent UCs Merit list
U/C Sachan Kalan				
41	Bibi Satama	Shezadi Khosro Faredon	Sachan Kalan	Own UC M/List
42	Bibi Norin	Rehmat Ullah	Sachan Kalan	Own UC M/List
U/C Sawan Maira				
43	Tahira Jabeen	Muhammad Ayub	Sawan Maira	Own UC M/List
U/C Shanaya				
44	Safoora Farat	Abdul Razaq	Shanaya	Own UC M/List
45	Irum Shaheen	Anwar Khan	Shanaya	Own UC M/List
U/C Shergarh				
46	Saeeda Haidar	Mir Haidar	Shergarh	Own UC M/List
47	Fozia Bibi	Sher Bahadar	Shergarh	Own UC M/List
48	Sadia Gul	M. Zaman	Shergarh	Own UC M/List
49	Asma	Abdul Malik	Darband	From Adjacent UCs Merit list
U/C Shukat Abad				
50	Sadia Javed	Javed Khan	Shukat Abad	Own UC M/List
51	Sabeen	M. Haroon	Shukat Abad	Own UC M/List
52	Tabassum Rashid	Abdul Rashid	Shukat Abad	Own UC M/List
U/C Trangri Sabir Shah				
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	Own UC M/List
54	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah	Own UC M/List
55	Sidra Hamayun	M. Hamayun	Trangri Sabir Shah	Own UC M/List
U/C Bandi Shungli				
56	Salma Javed	Muhammad Javed	Darband	From Adjacent UCs Merit list
57	Nosheen Bibi	Fazal ur Rehman	Darband	From Adjacent UCs Merit list
U/C Tanda				
58	Sahibzada Hazmat Rabani	Ghulam Rabani	Tanda	From Adjacent UCs Merit list
59	Asma Noreen	Nawab Khan	Dhodial	From Adjacent UCs Merit list

### ADJUSTMENT ORDER

Consequent upon the above, the following adjustment are hereby ordered against the posts mentioned against each.

S#	Name	Father's Name	Home Address/ Domiciled U/C	Place of Posting	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	GGPS Baffa Khurd	A/V/Post
2	Sabia	Noor Hussain	Baffa	GGPS Karido Gali	A/V/Post
3	Munaza Daud	Daud	Behali	GGPS Ashwal	A/V/Post
4	Nazma Bibi	R. Khan Bahdar	Behali	GGPS Jamal Nakka	A/V/Post
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	GGPS Karmang	A/V/Post
6	Shaista Jabeen	Muhammad Akbar	Kathai	GGPS Chandni	A/V/Post


- 2 -

  
 Muhammad  
 Digit: C

7	Bushra	Ghulam Mustafa	Bhekund	GGPS Kehnian Mian	A/V/Post
8	Naida Ashraf	Muhammad Ashrif Bag	Gari Habib Ullah	GGPS Danna Ganaila	A/V/Post
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	GGPS Chuntri	A/V/Post
10	Bibi Asia	Abdul Ghafoor	Hilkot	GGPS Khan Balimang	A/V/Post
11	Irum Saeed	Saeed Akhtar	Hangrai	GGPS Kalas Ghanaola	A/V/Post
12	Mariam Bibi	Muhammad Younis	Hangrai	GGPS Kalas Ghanaola	A/V/Post
13	Abbi Sajida	Saeed ur Rehman	Ichrian	GGPS Karmang Payeen	A/V/Post
14	Saima Ara	M.Fareed Khan	Ichrian	GGPS Ramsara	A/V/Post
15	Mah Jabeen	Muhammad Farooq	Jabar Daveli	GGPS Baso Manda Gucha	A/V/Post
16	Saba Tariq	Muhammad Tariq	Sachan	GGPS Baso Manda Gucha	A/V/Post
17	Sobia Bibi	Abdul Ghafoor	Jaloo	GGPS Talian Di Kasi	A/V/Post
18	Saima Naz	Mir Afzal	Jaloo	GGPS Chor Banda	A/V/Post
19	Fara Naz	Muhammad Khurshid	Karool	GGPS Bhoraj	A/V/Post
20	Nadia Rehman	Habib ur Rehman	Pairan	GGPS Dheri Sohaj	A/V/Post
21	Amrin Younis	Muhammad Younis	Karori	GGPS Seri Malwal	A/V/Post
22	Musrat Bibi	Khalil ur-Rehman	Karori	GGPS Malhar	A/V/Post
23	Zenab	Alam Zeb	Karori	GGPS Malhar	A/V/Post
24	Amrin Kuzar	Muhammad Miskeen	Karori	GGPS Fata Bandj	A/V/Post
25	Rukhsana Taj	Taj Muhammad	Karori	GGPS Fata Bandj	A/V/Post
26	Rifat Bibi	Faqeer Muhammad	Shanaya	GGPS Naryala	A/V/Post
27	Ashia	Misri Khan	Shanaya	GGPS Thakra	A/V/Post
28	Raziya Bibi	Muhammad Zaman	Darband	GGPS Dhok	A/V/Post
29	Sobia Arshad	Muhammad Arshad	Lussan Nawab	GGPS Sharota	A/V/Post
30	Rashida Bibi	M.Zahoor	Lussan Nawab	GGPS Chapra Bala	A/V/Post
31	Bibi Naseema	Ghulam Nabi	Mohandari	GGPS Badal Grnn	A/V/Post
32	Yasmeen Wahab	Abdul Wahab	Nika Pani	GGPS Cham	A/V/Post
33	Neelam	Abdul Laliif	Darband	GGPS Cham	A/V/Post
34	Lubna Younis	M. Younis	Perhinna	GGPS Phalkot	A/V/Post
35	Zahida Bano	Ali Zaman	Perhinna	GGPS Phalkot	A/V/Post
36	Bibi Saleha	Abdula Jan	Phutra	GGPS Ghazikot	A/V/Post
37	Melmaz Bibi	M. Iqbal	Phutra	GGPS Dhaman	A/V/Post
38	Bibi Mewash	M. Naveed	Phutra	GGPS Ghazikot	A/V/Post
39	<del>Farzana Younis</del>	<del>M. Younis</del>	<del>Phutra</del>	<del>GGPS Datangi</del>	<del>A/V/Post</del>
40	Bibi Farah	Khurshid Khan	Sawan Maira	GGPS Gojar Gali	A/V/Post
41	Bibi Salama	Shezada Khesro Fareedon	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/Post
42	Bibi Norjin	Rehmat Ullah	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/Post
43	Fahira Jabeen	Muhammad Ayub	Sawan Maira	GGPS Mohar	A/V/Post
44	Safoora Farat	Abdul Raziq	Shanaya	GGPS Numshera Shahkot	A/V/Post
45	Irum Shaheen	Anwar Khan	Shanaya	GGPS Numshera Shahkot	A/V/Post
46	Saeeda Haidar	Mir Haidar	Shergarh	GGPS Gakharh	A/V/Post
47	Fozia Bibi	Sher Bahadar	Shergarh	GGPS Perchaian	A/V/Post
48	Sadia Gul	M. Zaman	Shergarh	GGPS Perchaian	A/V/Post
49	Asma	Abdul Malik	Darband	GGPS Shorolian	A/V/Post
50	Sadia Javed	Javed Khan	Shuakat Abad	GGPS Lalan Da Darra	A/V/Post
51	Sabeen	M. Haroon	Shuakat Abad	GGPS Chajar Bala	A/V/Post
52	Fabasam Rashid	Abdul Rashid	Shuakat Abad	GGPS Paniyuli	A/V/Post
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post
54	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post
55	Sidra Hamayun	M. Hamayun	Trangri Sabir Shah	GGPS Khani Paloi	A/V/Post
56	Saima Javed	Muhammad Javed	Darband	GGPS Pagora	A/V/Post
57	Nooshin Bibi	Fazal ur Rehman	Darband	GGPS Beer Bat	A/V/Post
58	Sahibzadi Azmat Kebani	Ghulam Rabani	Tanda	GGPS Talian Manda Gucha	A/V/Post
59	Asma Noreen	Nawab Khan	Dhodial	GGPS Kothri	A/V/Post

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage, without assigning any reason/notice.

  
 Muhammad Arshad Khan Tancil  
 Advocate  
 Distt: Courts Abbottabad

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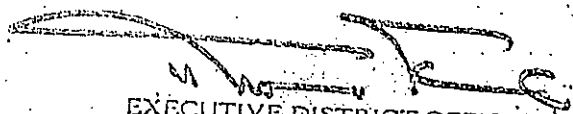
They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.

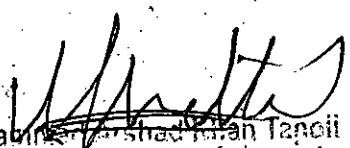
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature-ship will be stand automatically cancelled.
4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. They will submit to this office, their all testimonial, and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Mansehra)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice, their one month pay/allowances if any shall be forfeited to Government Treasury.
9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
10. They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
11. They may not be handed over the charge if their age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1<sup>st</sup> July 2001 in pervious post, their entitled for pension / gratuity etc.
13. No. TVDA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

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

Endst: No. 5360-5384 /Estt: (F)Apptt:PET(F)/2011-12 Dated Mansehra the 18<sup>th</sup> May, 2012.

- Copy to the:-
1. Secretary to Govt. of KPK E&SE Department Peshawar.
  2. Director E&SE Department KPK Peshawar.
  3. District Accounts Officer, Mansehra.
  - 4-5. District Officer (M&F) Local Office.
  6. Deputy District Officer (Female) E&SE Mansehra.
  7. PA to District Coordination Officer, Mansehra.
  8. Budget & Accounts Officer, local office, Mansehra.
  - 9-67. Candidates concerned.

  
EXECUTIVE DISTRICT OFFICER  
E&S EDU: MANSEHRA

  
Muhammad Iqbal Khan Tandon  
Advocate  
Distt: Courts Abbottabad



Annex C

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 2770 / S. Cause  
Dated the 29/9/2014

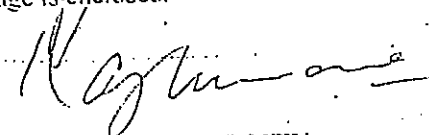
Email: [deoofmansehra@yahoo.com](mailto:deoofmansehra@yahoo.com)  
Phone & Fax: 0997-302518

SHOW CAUSE NOTICE

P-28

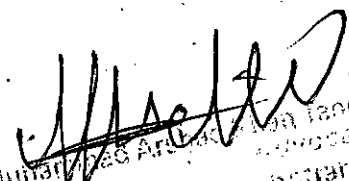
I, Naghinana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Rashida Bibi, PST GGPS Chapra Bala Mansehra Show cause Notice as follows:

- 1) You were illegally appointed as PST at GGPS Chapra Bala vide defunct Executive District Officer (E&SE) Mansehra at S. No. 30, out of U/C, where you were stranger for recruitment process initiated through FATA. Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will & wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014. More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.
- 2) Going through the finding and recommendation of the inquiry committee, the material on record & other connected papers including your defiance before the inquiry committee:-  
I am satisfied that you have committed the following acts/omissions specified in rules.
  - a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
  - b) Inflicted huge financial losses to the Govt. Treasury receiving pay as result of bogus appointment.
  - c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for unlawful appointment with collusion of then EDO.
- 3) As a result thereof, I as competent authority have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- 4) You are hereby required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.
- 5) If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-parte action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

  
COMPETENT AUTHORITY

Mst. Rashida Bibi

GGPS Chapra Bala

  
Mst. Rashida Bibi  
District Council, Mansehra

محکمات مندرجہ ذیل کے تحت (درج ذیل) عدالت میں پیش کیا گیا ہے

P-29

عنوان: جواب برائے شوکار نوٹس

صاحب عالیہ

گزارش جس کے تحت شوکار نوٹس وصولیہ از دفتر DEO زمانہ

ماہ 10/16/14 مورخہ 29-9-14 (نمبر 7767) مورخہ 10/16/14

وصولیہ بواسطہ ASDO - سیکرٹری سٹیٹ 3 اب ذیل ہے -

مقامی سائنس کا آرڈر دفتر EDO خلیفہ خلیفہ خلیفہ خلیفہ سے منسلک

آرڈر ڈیو EDO خلیفہ خلیفہ خلیفہ خلیفہ سے منسلک آرڈر No - 5360-5384/ESTI (F) APPT. P.T.C (F) 2011-12 dt Manshara 18/5/12 - The

سائنس کا آرڈر (30) پر حوا - تھا

(26) سائنس کا آرڈر EATA و افغان پاس کوالیفیکیشن 309 ات سے 152/16/14  
(3) سائنس کا آرڈر Professional & Academic Qualification  
B-A

(4) سائنس کا آرڈر جامعہ نوٹس کوٹلی اچھڑیاں میں مورخہ 29/9/14

(5) سائنس کا آرڈر طالبہ طالبہ کی بنیاد پر مورخہ 29/9/14 اور آرڈر  
کا کافی لغو حاضری رپورٹ لفٹ ہے -

(6) سائنس کا آرڈر طالبہ طالبہ کی بنیاد پر مورخہ 29/9/14 اور آرڈر  
بیان کرنے کے لیے رضامند ہے۔ لیزا عبد بانی فرما کر سائنس

کو شوکار نوٹس سے مشنی قرار دیا جائے

حسن راشد بی  
Rashid Bi  
16-10-2014  
مورخہ 29/9/14  
3

Muhammad Ali  
Advocate  
Distt. Courts Abbottabad



		<b>(Annex-LXXVI)</b>	
UC Parian	Nadia Rehman r/o UC Parian	Appointed at S.No 20 at GGPS Dehri Sohal in UC Karnol. No post was vacant in her own UC Parian. <b>(Annex-LXXVII)</b>	Appointment order in other UC is violation of recruitment rules/policy
UC Karori	Riffat Bibi UC Shanaiya	Appointed at S.No 26 at GGPS Nariala on the plea that UC Shanaiya is adjacent to UC Karori which is not correct. She was not a candidate of PST post rather she was candidate of CT post. Record of PTC qualification was not available. Her appointment is invalid. Her application form for CT post is available in office record. <b>(Annex-LXXVIII)</b>	The appointment is illegal and violation of recruitment rules/policy.
	Ayisha D/O Misri Khan r/o UC Shonia	Appointed at S.No 27 of appointment order at GGPS Thakra UC Karori. The plea that Shanaiya is adjacent to UC Karori is not correct it is far away for Shanaiya. <b>(Annex-LXXIX)</b>	Appointment is in violation of recruitment rules/policy  (As per record of the office the adjacent UCs of Karori are Darband, Nika pani, Kathai, bandi Shumli, Sher garh, Pharana and Phurla )
UC Lissan Nawab	Rashida Bibi r/o Lissan Nawab	Appointed at S.No 30 at GGPS Chapra Bala UC Battal that is the other UC which is far away from Lissan Nawab <b>(Annex-LXXX)</b>	Appointment in other UC is violation of recruitment rules/policy.
UC Phulra	Bibi Mehwish r/o UC Phulra	Appointed at GGPS Ghazi Kot S.No 38 in UC Phulra. Weightage of BA after the closing date of application is not valid as the closing date was 6.6.2011 and DMC contained 15-08-2011 the date of declaration of result. <b>(Annex-LXXXI)</b>	Appointment is irregular

Advocate  
 Distt. Courts Abbottabad

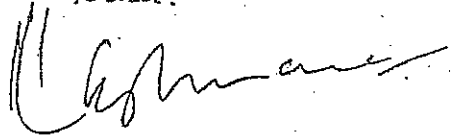


Annex E  
P-31

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

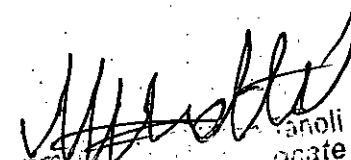
- 1:- Where as Mst: Rasheeda Bibi D/O Muhammad Zahoor working as PSI GGHS/GGMS/GGP Chapra Bala was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And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

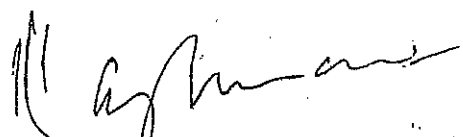
  
DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Endst: No. 2016-25 /AE- /Estab: dated 03/03 /2015.

Copy to the:-

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

  
Muhammad Anoli  
District Accounts Officer  
Distt. Council Abbottabad

  
DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

To,

THE DIRECTOR,  
Elementary & Secondary Education,  
KPK Peshawar

Annex F

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDST. NO.2016-25/AE-I/ESTAB. DATED 03.03.2015 WHEREBY MAJOR PENALTY OF DISMISSAL FROM GOVT. SERVICE WAS IMPOSED UPON THE APPELLANT, WITHOUT LAWFUL AUTHORITY. (COPY OF IMPUGNED NOTIFICATION IS ATTACHED AND MARKED AS ANNEXURE "A").

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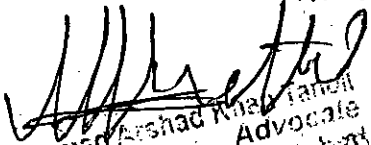
Prayer: -

Impugned notification may please be set aside from the date of its issuance declaring the same without lawful authority, contradictory to the recruitment policy and rules and re-instate the appellant with all back benefits at the same stations.

Respected Sir,

In respect, I would like to invite your kind attention to the following facts in connection to colourful exercise of a power on the part of authority i.e. D.E.O (F) Manshra.

- i. That, the then E.D.O (E&SE) Manshra invited application for recruitment of teachers of various cadres in District Manshra through advertisement published in National Newspaper and daily Mashriq. (Copy attached and marked as annexure "B").
- ii. That, the appellant applied for the post of PST and submitted all related document as desired by the authority i.e. Academic qualification certificates and Professional qualification, Certificate of PTC, Recruitment procedure initiate with EATA test, EATA test conducted on date 26<sup>th</sup> June 2011 and appellant qualified/passed the test and obtained 152 marks out of 300.
- iii. That, the then E.D.C conducted interview and scrutinized the documents of candidates and merit list of the candidates was displayed for the receiving objections. After due process the meeting of DSC was held and approved. The cases of 59 candidates for appointments against the post of PST whereas in the merit list, the name of appellant fall at the S.No.2 - in own u.c

  
Muhammad Arshad Khan  
Advocate  
Distt: Courts Abbottabad

iv. That appointment order of the appellant was issued under Endst. No.5360-5384/Estt(I)/Aptt:PET (I)/2011-12 dated 18<sup>th</sup> May 2012 and appellant was posted against the post of PST at GGPS Chapra Bala Manshra. (Copy attached and marked as annexure "C").

v. That, the appellant belongs to union council Lissan Nawab whereas two posts of PST were available. One of the post was filled with the local teacher whereas the second post was remained vacant. Whereas the appellant was posted at GGPS Chapra Bala instead of GGPS Lissan Nawab. This is an administration decision of the then EDO (E&SE) Manshra to appoint me so far from my parent union council. Moreover I visited the office of ASDEO several time to transfer me to the school of my native union council according to the rules and procedure laid down but despite repeated calls, the appellant was not posted at her own union council.

vi. That, the appellant continuously performing her duties so far from home in backward and less privileged area and also performed the extra duties of senior head teacher of GGPS Chapra Bala for a period of one year and nine month due to shortage of Senior Head Teacher. During the entire service no objection and un-satisfaction reported to the department against the appellant and appellant was performing her duties from the last 02 years and 09 months while she received a show cause notice whereby allegations were levelled against her. That the said show cause notice is based on concoction and concealment of facts and same is enclosed as annexure "D").

vii. That, a reply was submitted in a response to show cause notice whereas appellant adopted continuation that she was appointed after due recruitment process and her appointment order alongwith other candidates was issued in a lot after the approval of DSC and also desired for personal hearing by D.E.O (I) Manshra but no personal hearing was made. (Enclosed as annexure "E").

viii. That, the appellant received impugned order dated 03.03.2015 whereby the major penalty of dismissal from service has been imposed upon the appellant. That the appellant passed her professional qualification (PST) from Allama Iqbal Open University. (Copy attached and marked as annexure "F").

Handwritten signature: *M. H. Khan*  
Muhammad Kishan Khan, Advocate  
Distt: Courts Abbottabad

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ix. Academic Qualification BA from Hazara University. (Copy attached and marked as annexure "G").

Sir,

(a) Appellant was appointed due process of recruitment through EATA and qualified/completed all requirement of PST post as per recruitment rule and appointment order of 59 candidates was issued after approval of DSC, the appellant served for a period of 02 years and 09 month with full devotion and zeal and zest.

(b) No inquiry was conducted or initiated. No opportunity of defense offered. No personal hearing was made. How the authority passed the order in the light of E&D rules and under what changes/evidence imposed such a harsh punishment of dismissal from service.

Therefore, it is requested in your honour that in the light of above facts you are requested to set aside the impugned notification of dismissal from service which is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station who was appointed against the post of PST in result of completion of due recruitment process on merit basis and it is also requested after re-instatement of the appellant's original appointment order, the appellant be transferred to her parent union council i.e. Lissan Nawab as per specified in recruitment rule.

Dated 16.03.2015

Yours faithfully,  
*Rashida*  
RASHIDA BIBI  
PST  
GGPS Chapra Bala,  
Battal Marisehra.

Enclosure:

- A. Termination Order.
- B. Copy of advertisement.
- C. Appointment order.
- D. Show cause notice.
- E. Reply of show cause notice.
- F. Academic qualification certificate of Matric (SSC, F.A & BA).
- G. Professional qualification certificate of PTC.
- H. Medical Certificate.
- I. Domicile Certificate.
- J. NIC copy.
- K. Arrival Report.

*Muhammad Arshad*  
Muhammad Arshad  
Advocate  
Distt. Courts Abbottabad

# HEALTH & AGE CERTIFICATE

- Name of official Rashida Bibi
- Father's Name Mohammed Zahoor
- Date of Birth 13-03-1985
- Cast of Race Tanki
- Address Mohallah New Abadi Laxan Nawab
- Tehsil Khushroo District Khushroo
- Extra height by measurement 4-10
- Personal mark of identification inf
- National Identity Card No 13503-2777473-4
- Signature of official Rashida
- Signature of head of official \_\_\_\_\_

Seal of office

I do hereby certify that I have examined Mr. Rashida Bibi  
 Employment in the office Education Dept.  
 And can do not discover that he had any disease communicable of  
 other constitutional affection or bodily infirmity expect NIC

I do not consider this as disqualification for employment in the office  
 Of the (As above) his age according to his own statement is 27  
 years and by appearance about 27 years.

Left hand thumb and finger impression

*[Handwritten Signature]*  
 District Courts, Abbottabad

*[Handwritten Signature]*  
 Medical Superintendent,  
 King Abdullah Teaching  
 Hospital Mansehra  
 (Dr. Manzoor Ahmad)  
 Medical Superintendent  
 King Abdullah Teaching  
 Hospital Mansehra.

26/05/2012



قیمتی

کورٹ فیس

# وکالت نامہ

بعدالت KPIK سروریل لبرٹ اور

عنوان: رائٹر مہی بی بنام گورنمنٹ KPIK ایجوکیشن ڈپارٹمنٹ

منجانب: ایڈووکیٹ

نوعیت مقدمہ: رسل

## باعث تحریر آنکہ

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

شہزادہ سید خان نسیمی ریلوے سٹیشن کورٹ رولڈ ایڈووکیٹ

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد استجارت نالش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 9/7/2015

بمقام:

صاحب  
Adv. High Court Add  
Rashid Ali

Rashid Ali

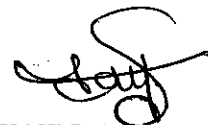
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

**Service Appeal No. 803/2015**

Respectfully Shewth

1. That the services appeal No: 803/2015 in respect of **MST: Rashida Bibi** is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4100-05/F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been **reinstated against the post of PST. (Notification attached).**

It is requested that the above mentioned appeal may kindly be **dispose off please.**



DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA



JES

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

**NOTIFICATION.**

WHEREAS, ~~Mst. Rashida, PST at Government Girls Primary School Chapra Bala District Mansehra~~ was dismissed from service by the DEO (Female) Mansehra vide Order No. 2016-25 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

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

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

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

1. She belongs to U/C Lissan Nawab where 02 Posts were lying vacant. Her name was at S. No. 02 of the merit list in her U/C. She was appointed in her own U/C but wrongly adjusted at GGPS Chapra Bala U/C Battal vide Endst.No. 5360-84 dated 18/5/2012 at S.No. 29.

2. ~~Appeal may be accepted as she is required to be adjusted in her own U/C according to merit. However, if she is comfortable with her posting, she may be allowed to continue as usual.~~

NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 2016-25 dated 03/03/2015 and reinstate Ms. Rashida PST at Government Girls Primary School Chapra Bala District Mansehra with effect from the date of her dismissal with all back benefits.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4100-05 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

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

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

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