

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD

Service Appeal No. 127/2016

Date of Institution... 03.02.2016

Date of decision... 20.11.2017

Mst. Seeroze Martha D/O Inayat Gul House No. 990, Mohallah Noor-ud-Din, District, Abbottabad. ... (Appellant)

Versus

1. Secretary to Government of Khyber Pakhtunkhwa Schools & Literacy, Peshawar and 5 others. (Respondents)

MR. SAJJAD SARWAR,
Advocate

... For appellant.

MR. MUHAMMAD BILAL
Deputy District Attorney

... For respondents.

MR. NIAZ MUHAMMAD KHAN,
MR. AHMAD HASSAN,

... CHAIRMAN
... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned counsel for the parties heard and record perused.

FACTS

2. The appellant was prematurely retired on her request vide order dated 12.08.2015 against which she filed a departmental appeal on 19.08.2015 which was not responded to and thereafter she filed the present service appeal on 03.02.2016. The appellant has only challenged that part of the order dated 12.08.2015 in which 700 days have been treated as extraordinary leave without pay.

ARGUMENTS

3. The learned counsel for the appellant argued that though the appellant was retired prematurely on her own request vide application dated 15.8.2015 but the recovery of pay of 700 days is illegal. He further argued that the present service appeal is time barred for which the appellant has already filed an application for condonation of delay with the memorandum of appeal. The reason shown is the pendency of her application before the Provincial Ombudsman.

4. On the other hand, the learned Deputy District Attorney, argued that the appellant himself filed an application on 23.7.2015 wherein she admitted her absence for the period mentioned above. He further argued that the present appeal is hopelessly time barred because the period spent before the Provincial Ombudsman cannot be condoned. He further argued that the department has rightly ordered recovery of pay of 700 days from the appellant on the basis of principle of *no work no pay*.


CONCLUSION.

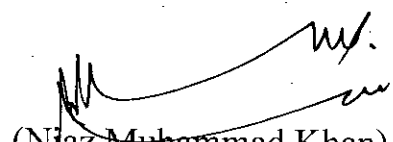
6. The time spent before the wrong forum is no ground for condonation of delay as held by the august Supreme Court of Pakistan in judgment reported as 2016-SCMR-872. However, the present prayer of the appellant is for the wrong recovery of pay which is a financial matter and it is now an admitted position that in financial matters cause of action accrues to a civil servant every day. The Tribunal is therefore, of the view that the present appeal is not time barred.

6. Coming to the merits of the appeal, the learned counsel for the appellant has not been able to convince this Tribunal that how the order of the authority ordering for the recovery of the pay is illegal. The learned counsel for the appellant when confronted with the application dated 23.07.2015 of the appellant he argued that

this application was moved after the application for retirement dated 15.3.2015 and it was the result of undue influence, coercion by the department. But nowhere in the appeal, the appellant has challenged this undue influence and coercion. The appellant in para-4 of the memorandum of appeal termed the period as so called absence but she has not referred to any application or the date of application whereby she had applied for the medical leave or any other kind of leave. It is also an admitted position that the department has published a notice in the Daily Mashriq Peshawar on 08.01.2015 regarding the absence of the appellant which further proved that the appellant remained absent from duty. This Tribunal is also not in position to direct the department to convert this period into any kind of leave because nowhere in the memorandum of appeal, the appellant has given particulars about her leave due nor ^{did} she ~~did~~ ^{she} apply for conversion of leave into medical leave.

7. Under the circumstances, the appellant has failed to prove her appeal which is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

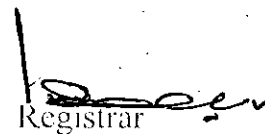

(Ahmad Hassan)
Member


(Niaz Muhammad Khan)
Chairman
Camp Court, A/Abad

ANNOUNCED
20.11.2017

25.05.2017

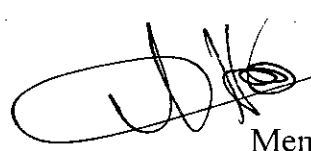
Since tour programme to camp court, Abbottabad for the month of May, 2017 has been cancelled by the Worthy Chairman, therefore, to come up for the same on 20.11.2017 at camp court, Abbottabad. Notices be issued to the parties for the date fixed accordingly

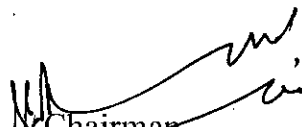

Registrar

20.11.2017

Counsel for the appellant and Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Zahid Gul, ADO and Malik Haroon, AAO for the respondents present. Arguments heard and record perused. .

This appeal is dismissed as per our detailed judgment of today. Parties are left to bear their own cost. File be consigned to the record room.


Member


Chairman
Camp Court, A/Abad.

ANNOUNCED

20.11.2017

127/16

18.08.2016

Counsel for the appellant, M/S. Muhamad Irshad, SO, and Zahid Gul, ADO alongwith Mr. Muhammad Bilal, GP for the respondents present. Written reply by respondents No. 1, 3 to 4 & 6 submitted. Learned Sr.GP relies on the same on behalf of respondents No. 2 and 5. The appeal is assigned to D.B for rejoinder and final hearing for 18.1.2017 at camp court, Abbottabad.

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[Handwritten signature]

Chairman
Camp court, A/Abad.

18.01.2017

Agent to counsel for the appellant and Mr. Muhammad Siddique, Sr.GP with Zahid Gul, ADO for the respondents present. Requested for adjournment. To come up for rejoinder and final hearing on 15.05.2017 before D.B at camp court A/Abad.

Member

[Handwritten signature]


Chairman
Camp court A/Abad.

17.02.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PSHT and after putting in 30 years service she applied for retirement which application was processed but vide impugned order dated 12.8.2015 a penalty in the shape of recovery of Rs.868428/- was imposed against the appellant where-against she preferred departmental appeal on 19.8.2015 followed by reminder dated 5.10.2015 but of no avail and hence the instant service appeal on 3.2.2016.


That the appellant was neither given any opportunity of hearing nor any inquiry in the matter was conducted. That the appellant is entitled to receive pension as the same is in excess of the imposition of the penalty referred to above.

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 18.5.2016 before S.B at Camp Court A/Abad. Notice of stay application be also issued for the date fixed. It is directed that the appellant be paid pension on monthly basis after deducting of the afore-stated amount from her pensionary benefits.


Chairman
Camp Court A/Abad

18.5.2016

Counsel for the appellant and M/S. Zahid Gul, ADO and Muhammad Irshad, SO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Requested for adjournment. To come up for written reply/comments on 18.08.2016 at camp court, Abbottabad.




Chairman
Camp court, A/Abad

Appellant Deposited
Security & Process Fee

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 127/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03.02.2016	<p>The appeal of Mst. Seeroz Martha presented today by Mr. Sajjad Sarwar 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	8-2-16	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>17-2-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 127 of 2016

Seeroze Martha VERSUS Secretary KPK and others

I N D E X

S.No	Description of Documents	Annexure	Page
1.	Appeal		1-5
2.	Affidavit		6
3.	Addresses of parties		7
4.	Application for interim relief		8-9
5.	Application of condonation of delay		10-11
6.	Annexure A		12-34
7.	Annexure B		35-36
8.	Annexure C		37
9.	Annexure D		38
10.	Annexure E		39
11.	Annexure F		40-41
12.	Annexure G		42-57
13.	Annexure H		58
	Wakalat Nama		59

Petitioner

Through

Sajjad Sarwar

Advocate, High Court,
Abbottabad.

Cell No. 0332-5001780

AND

Muhammad Ali Asif

Advocate, High Court,
Abbottabad.

Cell No. 0314-5005448

BEFORE THE KPK SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 127 of 2016

N.W.F. Province
 Service Tribunal
 Diary No. 82
 dated 03-2-2016

Mst. Seeroze Martha D/o Inayat Gul, H.No 990. Mohallah Noor-ud-Din, District
 Abbottabad.

.... Petitioner

Versus

1. Secretary to Govt. KPK Schools and Literacy KPK Peshawar.
2. Secretary to Govt. KPK Finance KPK Peshawar.
3. Director Education and Schools KPK Peshawar.
4. District Education officer Female Abbottabad.
5. District Account Officer Abbottabad.
6. District Sub-Divisional Education Officer Female Abbottabad.

.... Respondents

APPEAL UNDER SECTION 4 OF KPK SERVICE
TRIBUNAL ACT 1974, AGAINST ORDER ENDST #
9924-25/EB/1/R/CASESVOL;01 DATED 12-08-2015 OF
THE RESPONDENT NO.4 WHEREBY THE
RESPONDENT ORDERED FOR RECOVERY OF
AMOUNT RS. 868,428/- FROM THE APPELLANT IS
ILLEGAL FAKE FICTITIOUS AND IS LIABLE TO BE
SET ASIDE .

Respectfully Sheweth: -

This appeal arises in the backdrop of the following facts
 and grounds among others:-

Facts: -

1. That the Appellant was appointed as LST in Education
 Department District Abbottabad on 23.11.1983. Appellant

Filed in the
 Registry
 3/2/16

was promoted as PHST as per promotion Policy. Appellant has served the department almost 30 years with honesty and diligence throughout her service and during her service there was neither any complaint nor any departmental enquiry, service book of Appellant is evident of it.

(Copy of service book is annexed as annexure A)

2. That the appellant was promoted to BPS-15SPHT from BPS-14 through letter number SO(FR)FT/10-22(E)2010 dated 16-7-2012 after which appellant was allowed Rs-12440/- for the tenure 02-03-2013 to 30-09-2013 as arrear amount due on department after her promotion which is clear evidence for the regular service of the appellant.

(Copy of ~~Code~~ is annexed as annexure B)

3. That the Appellant moved an application for her retirement on 15-03-2015 from the service due to her severe health condition which was remained unanswered for almost 5 months.

(Copy of application is annexed as annexure C)

4. That the Appellant after inquiring for the response of her application of retirement, came to know that the respondents are creating hurdles in preparation of Pension/Gratuity etc by so called absentees. At that time Appellant filed a separate application regarding converting so called absentees into leave with pay according to Service rules and regulation but respondents never replied on this application of the Appellant as well.

(Copy of application is annexed as annexure D)

5. That the Appellant was informed through letter Endst: NO. 9924-25 /EB-I/R/Cases Vol: 01 dated 12-08-2015 that Appellant was absent w.e.f 03-03-2013 to 31-01-2015 and ordered recovery of absent period amounting Rs-868428/- made from her pension/ gratuity etc. which was illegal against the rule, law and facts.

(Copy of letter Endst: NO. 9924-25 /EB-I/R/Cases Vol: 01 is annexed as annexure E)

6. That the Appellant has filed an appeal on 15.08.2015 to District Education Officer Female Abbottabad Against the order of recovery amount. Copy of this appeal was also sent to Secretary Primary Education KPK Peshawar, Director Education KPK Peshawar, Commissioner Hazara and Deputy Commissioner Abbottabad. However no response ever received despite lapse of a reasonable time period.

(Copy of appeal is annexed as annexure F)

7. That the Appellant also filed a departmental appeal to Director Education KPK Peshawar on 19.08.2015 against the order of recovery amount. Copy of this appeal was also sent to Chief Justice of Pakistan, Prime Minister KPK, Chief Secretary KPK Peshawar, Secretary Education Department KPK Peshawar, Provincial Ombudsman and Deputy Commissioner Abbottabad. Whereas among these only The Provincial Ombudsman responded by writing a letter to the Petitioner, The accounting General KPK Peshawar, District Account Officer Abbottabad and District Education Officer Female Abbottabad to inquire into the matter. After due proceedings the Ombudsman decided that this is not a case of Mal- administration hence do not comes under the jurisdiction of Ombudsman.

(Copy of departmental appeal, reply of Ombudsman, Department and Reply of Appellant and findings of Ombudsman annexed as annexure G)

8. That the Appellant once again requested Director Education KPK Peshawar on 05.10.2015 to decide the departmental appeal but no proceeding has taken place till date.

(Copy of Reminder/application is annexed as annexure H)

Grounds: -

A. That the Appellant belongs to minorities due to which Appellant is being victimized and marginalized.

B. That the Appellant has not absented herself illegally even for a single day. In this respect following submissions are made:-

i. There is no record of unauthorized absentees in the service book of the Appellant which is kept and maintained by the office.

ii. Whatever minimum leaves the Appellant has taken were with due permission and because of illness. It is evident from the fact that the Appellant was getting full salary for the whole period. However due to

prejudice all the leave application of the Appellant have been displaced from the office record.

iii. The Appellant has received arrears of rupees 12,440 for the period of 02.03.2013 to 30.09.2013, which is also included in the alleged absentee period. How can a person absent from duty get any arrears.

C. That no opportunity of being heard was given to the Petitioner. This is evident from the service book which is against the principle of natural justice. However the only opportunity given to the Appellant given through a notice on 08.01.2015 in Daily Mashraq Peshawar newspaper instead of giving a personal opportunity of hearing. This newspaper is published in Peshawar and has very low circulation in Hazara region. Therefore hardly any copy reaches Abbottabad.

D. That the impugned order of the respondents is in utter disregard of prescribed procedure and it is the violation of established principles of equity and justice calling for interference by this Honorable Court.

E. That the Appellant is not getting any response of her appeals and complains before different authorities because of bias against her.

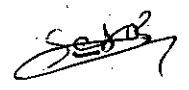
F. That the appellant seeks leave of this Honorable Tribunal to agitate additional grounds at the time of arguments.

That it has proved above in the appeal the entire exercises regarding recovery is fraudulent concocted and result of a conspiracy to deprive the Appellant from her lawful rights.

G. That the impugned order of the respondent is in violation of principle of natural justice and malafide.

Prayers

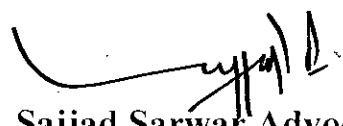
IT IS THEREFORE HUMBLY REQUESTED TO ACCEPT THE INSTANT APPEAL OF THE APPELLANT BY CONVERTING ABSENTEES INTO LEGAL LEAVES WHICH WAS HER LEGAL RIGHT AS EVIDENT FROM SERVICE BOOK AND QUASH THE ORDER FOR THE RECOVERY OF RS.868428 AND ACCEPT THE PETITIONER'S RETIREMENT APPLICATION WITH FULL BENEFITS AS PER RULES AND REGULATIONS.



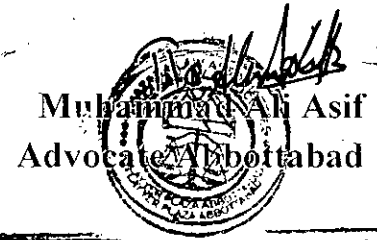
APPELLANT

Dated 03-02-2016

Through

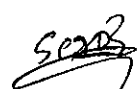


**Sajjad Sarwar Advocate
High Court Abbottabad**


**Muhammad Ali Asif
Advocate Abbottabad**

VERIFICATION:-

Verified that the contents of fore going appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.



APPELLANT

6

BEFORE THE KPK SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ of 2016

Mst. Seeroze Martha D/o Inayat Gul, H.No 990. Mohallah Noor-ud-Din, District Abbottabad.

.... Appellant

Versus

Secretary to Govt. KPK Schools and Literacy KPK Peshawar and others

.... Respondents

APPEAL

AFFIDAVIT

I, . Seeroze Martha D/o Inayat Gul, H.No 990. Mohallah Noor-ud-Din, District Abbottabad, do hereby affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Tribunal.



Identified by :-

Sajjad Sarwar
Sajjad Sarwar
Advocate High Court, Abbottabad

&

Muhammad Ali Asif
Muhammad Ali Asif
Advocate Abbottabad.

MS

Asif

BEFORE THE KPK SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ of 2016

Mst. Seeroze Martha D/o Inayat Gul, H.No 990. Mohallah Noor-ud-Din, District Abbottabad.

.... Appellant.

Versus

Secretary to Govt. KPK Schools and Literacy KPK Peshawar and others

.... Respondents

APPEAL

ADDRESSES OF THE PARTIES

Respectfully Sheweth:-

Mst. Seeroze Martha D/o Inayat Gul, H.No 990. Mohallah Noor-ud-Din, District Abbottabad.

.... Appellant

Versus

1. Secretary to Govt. KPK Schools and Literacy KPK Peshawar.
2. Secretary to Govt. KPK Finance KPK Peshawar.
3. Director Education and Schools KPK Peshawar.
4. District Education officer Female Abbottabad.
5. District Account Officer Abbottabad.
6. District Sub-Divisional Education Officer Female Abbottabad.

.... Respondents

Seeroze
APPELLANT

Dated: 03-02-2016

Through

Sajjad Sarwar
Sajjad Sarwar Advocate
High Court Abbottabad
Muhammad Ali Asif
Muhammad Ali Asif
Advocate Abbottabad

Muhammad Ali Asif
Advocate Abbottabad

BEFORE THE KPK SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ of 2016

Mst. Seeroze Martha D/o Inayat Gul, H.No 990. Mohallah Noor-ud-Din, District
Abbottabad.

.... Appellant

Versus

Secretary to Govt. KPK Schools and Literacy KPK Peshawar and others

.... Respondents

PETITION

APPLICATION FOR INTERIM RELIEF

1. That the captioned Appeal is being filed today and the contents of its appeal may be treated as integral part of this application and same are not repeated herein for the sake of brevity.
2. That has served the department almost 30 years with honesty and diligence throughout her service and during her service there was neither any complaint nor any departmental enquiry.
3. That the applicant has got good prima facie case and the respondents are reluctant to issuing monthly pension and other benefits of the petitioner.
4. That the respondents are depriving the Appellant from her right by not releasing her monthly pension and other pensions benefits.

**IT IS THEREFORE, VERY
HUMBLY PRAYED THAT THIS
HONORABLE COURT BY WAY OF**

AD-INTERIM ORDER MAY GRACIOUSLY BE PLEASED TO ISSUE DIRECTION TO RESPONDENT TO RELEASE HER MONTHLY PENSION AND OTHER PENSIONS BENEFITS.

Sarwar
Applicant

Through Counsel

[Handwritten Signature]

(Sajjad Sarwar)

Advocate High Court

Abbottabad

[Handwritten Signature]
(Muhammad Ali Asif)
Advocate
Abbottabad

Muhammad Ali Asif
Advocate

Dated: 03-02-2016

Affidavit

It is solemnly affirm that contents of the above application are true and correct to the best of my knowledge and belief and that nothing material has been concealed or withheld.

[Handwritten Signature]
Deponent

Dated: 03-02-2016

[Handwritten Signature]
3/16

10

BEFORE THE KPK SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ of 2016

Mst. Seeroze Martha D/o Inayat Gul, H.No 990. Mohallah Noor-ud-Din, District Abbottabad.

.... Appellant

Versus

Secretary to Govt. KPK Schools and Literacy KPK Peshawar and others

.... Respondents

PETITION

APPLICATION FOR CONDONATION OF DELAY UNDER SECTION 5 OF THE LIMITATION ACT 1908.

1. That the captioned Appeal is being filed today and the contents of its appeal may be treated as integral part of this application and same are not repeated herein for the sake of brevity.
2. That the Appellant has filing departmental appeal on 19-08-2015 to the higher authorities which remained un heard. For the perusal of this appeal Appellant filed another application to the higher authorities on 05-10-2015.
3. That the ombudsman replied to the departmental appeal and proceeded the case to the extent of his jurisdiction and give his final verdict on 26-11-2015.
4. That the Appellant was engaged in these proceeding for the redressal of her grievance, due to which instant Appeal was not preferred.

//

IT IS THEREFORE, VERY
HUMBLY PRAYED THAT THIS
HONORABLE COURT MAY
CONDONE THE PERIOD OF
LIMITATION, AND ACCEPT THE
INSTANT APPEAL FOR
PROCEEDING.


Sarwar
Applicant

Through Counsel



(Sajjad Sarwar)
Advocate High Court
Abbottabad

Muhammad Ali Asif
(Muhammad Ali Asif)
Advocate
Abbottabad



Muhammad Ali Asif
Advocate

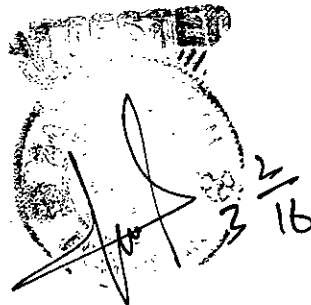
Dated: 03-02-2016

Affidavit

It is solemnly affirm that contents of the above application are true and correct to the best of my knowledge and belief and that nothing material has been concealed or withheld.

Sarwar
Deponent

Dated: 03-02-2016



ANNEXURE
A

1. Name - Seraj Martha

2. Race - Gill (Christian)

3. Residence - Abbottabad

4. Father's name and residence - Inayat William of Abbottabad

5. Date of birth by Christian era as nearly as can be ascertained

Source from original S.S.C. - Twenty-Eight July N.H. (28-8-1968)

Source from original S.S.C. - 28-07-1958 (Twenty eight July N.H. and fifty eight)

6. Exact height by measurement - 5ft-3 & fifty eight

7. Personal marks for identification - All cutting attended, A Scar on right wrist, Sub. Div. of S.S.C. exam completed at Abbottabad

8. Left hand thumb and finger impression of (non-armed) officer

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government servant - Seraj Martha 23-11-88

10. Signature and designation of the Head of the Office, or other Attesting Officer

Sub Divisional Education Officer (F) Abbottabad

Sub Divisional Education Officer (F) Abbottabad

Asstt Sub Division Edu: Officer (F) Attd



Muhammad Ali Asif Advocate

AMMEXUSE
(A)

عبدالرزاق الیٹا ابار ہر اردو

Moire,

- 1.
- 2.
- 3.

Verification Roll No. _____, dated _____ received back _____

Left thumb-impression.

Qualification	Date	Qualifications	Dat.
English Passed B.S.E Examination from B.S.S. Education, Peshawar held in April 1976, Marks obtained 348 out of 400 in E. Grade. Date of result 15 July 1976.		First Arts B.L. or B.A.	
Urdu Sub-Divisional Education Officer (Female) Abbottabad		Leadership examination Training School Final examination	
Plan-drawing Passed P.T.E from Govt College of Elementary Teachers Education, Peshawar, in Session 1982-83 under Bk. - 36, Marks obtained 688 out of 1150. Date of result Court duties - 5. 1983.		Other qualifications—	
Reserve Officer Passed F.A Examination from BISE - Abbottabad in 1993. under Roll No - 1985. Marks obtained 542 out of 1100. in 2nd Division. no 1993. Result declared on 21.11.93.			

Sub-Divisional Education Officer
N.A (Female) Abbottabad



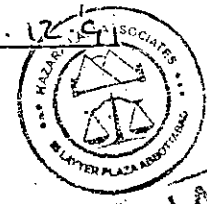
Muhammad Ali Asif
Advocate

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Name of post	Whether substantive or not and whether permanent or temporary	If officiating, state the appointive department of (or) whether service counts under Art. 371 of S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Gr. Pay
P.T.C.		<u>B.P.S. 7 Rs 560-23-1020</u>					
Q.A.P.S. Hathi	Officiary		Rs 560/- P.M.			23.11.83	520
do	do		Rs 560/- P.M.			1.12.83	520
do	do		Rs 583/- P.M.	✓		1.12.84	500
do	do		Rs 606/- P.M.	✓		1.12.85	520
R.S.P.S. Kalasi	m		Rs 629 1/2 P.M.	✓		1.12.86	520
		<u>B.P.S. No 7 Rs 750/-31-1370</u>					
do	do		Rs 843/-	✓		1.7.87	520
do	do		Rs 874/-	✓		1.12.87	520
do	do		Rs 905/-	✓		1.12.88	520
do	do		Rs 936/-	✓		1.12.89	520
do	do		Rs 967/-	✓		1.12.90	520
		750-31-1370 843/- on					
		B.P.S. No 7: 1095-60-1995					
		Rs 1455/-					
		Rs 15.15/-					

750-31-1370
843/- on

Account
by Muhammad Ali Asif
a
B.P.S. No 7: 1095-60-1995



Muhammad Ali Asif
Advocate

Muhammad Ali Asif

Signature and designation of the head of the office or other attesting officer in attestation of Form 1 on 2	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Name and duration of leave taken	Allocation of period of leave or amount pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded pension or gratuity, or reward or praise of the Government Service
					Period to which Government to which debitable		
Hukhtain Beg S.D.E.O. (F) A. Abad	30/11/85	Notional Increment	Hukhtain Beg S.D.E.O. (F) R. Abad		Appointed against vacant P.T. post at P. G. P. 3, H. T. at B. 560-23-1020 vide the office of D.E.O. (F) ATD Abbottabad 140-8300-8347/E.A./M/201.11.1985.	Hukhtain Beg Sub Divisional Education Officer (Female) Abbottabad	
Hukhtain Beg S.D.E.O. (F) A. Abad	30/11/84	Increment	Hukhtain Beg S.D.E.O. (F) A. Abad				
Hukhtain Beg S.D.E.O. (Female) Abbottabad	30/11/85	-d-	Hukhtain Beg S.D.E.O. (Female) Abbottabad				
Hukhtain Beg S.D.E.O. (Female) Abbottabad	30/11/86	-u-	Hukhtain Beg S.D.E.O. (Female) Abbottabad				
Hukhtain Beg S.D.E.O. (Female) Abbottabad	30/11/87	Revised of pay	Hukhtain Beg S.D.E.O. (Female) Abbottabad				
Hukhtain Beg S.D.E.O. (Female) Abbottabad	30/11/87	Increment	Hukhtain Beg S.D.E.O. (Female) Abbottabad				
Hukhtain Beg S.D.E.O. (Female) Abbottabad	30/11/88	Increment	Hukhtain Beg S.D.E.O. (F) ATD				
Hukhtain Beg S.D.E.O. (F) ATD	30/11/89	Increment	Hukhtain Beg S.D.E.O. (F) ATD				
Hukhtain Beg S.D.E.O. (F) ATD	30/11/90	Increment	Hukhtain Beg S.D.E.O. (Female) R.				
Hukhtain Beg S.D.E.O. (Female) Abbottabad	31/5/91	BPS Revised	Hukhtain Beg S.D.E.O. (F) ATD				
Hukhtain Beg S.D.E.O. (F) ATD	30/11/91	Increment	Hukhtain Beg S.D.E.O. (F) ATD				
Hukhtain Beg S.D.E.O. (F) ATD	30/11/92	Increment	Hukhtain Beg S.D.E.O. (F) ATD				

Appointed against vacant P.T. post at P. G. P. 3, H. T. at B. 560-23-1020 vide the office of D.E.O. (F) ATD Abbottabad 140-8300-8347/E.A./M/201.11.1985.

Hukhtain Beg
Sub Divisional Education Officer (Female) Abbottabad

1 service verified from 1-12-83 to 30-11-84. Acquittance rolls & other record kept in this office.

Hukhtain Beg
Sub Divisional Education Officer (Female) Abbottabad

2 service verified from 1-12-84 to 30-11-85. Acquittance rolls and other record kept in this office.

Hukhtain Beg
S.D.E.O. (Female) Abbottabad

3 service verified from 1-12-85 to 30-11-86. Acquittance rolls & other record kept in this office.

Hukhtain Beg
S.D.E.O. (F) A. Abad

4 Services verified from acquittance rolls and other record kept in this office from 1-12-86 to 30-11-87.

Hukhtain Beg
S.D.E.O. (Female) R. Abbottabad

5 Services verified from acquittance rolls and other record kept in this office from 1-12-87 to 30-11-88.

Hukhtain Beg
S.D.E.O. (Female) R. Abbottabad

6 Services verified from acquittance rolls and other record kept in this office from 1-12-88 to 30-11-89.

Hukhtain Beg
S.D.E.O. (Female) R. Abbottabad



Muhammad Ali Asif
Advocate

Handwritten signature

Under taking

2 arrangements to be made to effect payment
of final arrears of pay.
Signature: [Signature]

Name of post

Other: [Signature]
5250 (1-31-1)

Plack

G. G.P.S. Phasi

RS 1575/- 11242

~~1635/-~~ 93

Order of the Accountant General
N.W.F.P. Poonahar
Pay Band in the Revised Pay Scale 1991
of Rs. 1095-60-1995 (B-1)
@ Rs. 1455/- N.W.F.P. 1-6-1991
With Next Increment on 1-12-1991

[Signature]
Accounts Officer
Pay Band 1095-60-1995

order

Entries Revised 1635/- 11295

order

1575/- 1 6/91

order

1575/- 1 18/91

order

1635/- 1 12/92

order

1675/- 1 12/93

BPS-19-1185-12-2265

order

Rs. 1689/- 2 12/93

order

Rs. 1689/- 11293

BPS-N6-9-1685-97-3060

Rs. 2284/- P.M 1-6-94



Muhammad Ali Asif
Advocate

[Signature]

1955 12

1956 17

13

14

15

Signature and
date of the officer
to be attached
with the application
of the candidate

Signature and
date of the officer
to be attached
with the application
of the candidate

Signature and
date of the officer
to be attached
with the application
of the candidate

Signature and
date of the officer
to be attached
with the application
of the candidate

Reference to any
revised particulars
of nature or
residence of
the Government
service

S.D.E.O. (F) ATD
N.A.

30/11/93

S.D.E.O. (F) ATD
N.A.

Sanction is hereby accorded of
upper Age Relaxation against PTE
post for three months and thirty
five days Endrt. No 5749-51
Dated 19-10-84 by the S.E. (F) ATD

S.D.E.O. (F) ATD

T-5688
19/7/94

Drawn against
of amount by on the analogy
of Mr. Zameer Khan B-3.
11 30/11/94 2222/2

S.D.E.O. (Female)
Abbotabad
Service verified from
12-89 to 30-11-90
S.D.E.O. (Female)
Abbotabad

S.D.E.O. (F) ATD
N.A.

31/11/94

Entries
Revised
concomitantly
S.D.E.O. (F) ATD
N.A.

Service verified from
12-90 to 30-11-91
S.D.E.O. (Female)
Abbotabad

S.D.E.O. (F) ATD
Abad

S.D.E.O. (F) ATD
N.A.

30/11/91

Drawn
S.D.E.O. (F) ATD
N.A.

(9)

Service
and
from 12-91 to 30-11-93
S.D.E.O. (F) ATD
N.A. Abbotabad

S.D.E.O. (F) ATD
N.A.

30/11/92

Drawn
S.D.E.O. (F) ATD
N.A.

S.D.E.O. (F) ATD
N.A.

30/11/93

Drawn
S.D.E.O. (F) ATD
N.A.

S.D.E.O. (F) ATD
N.A.

20/11/93

Scale
Revised
S.D.E.O. (F) ATD
N.A.

(10)

Service
and
from 12-93 to 30-11-95
S.D.E.O. (F) ATD
N.A. Abbotabad

S.D.E.O. (F) ATD
N.A.

30/11/95

Drawn
S.D.E.O. (F) ATD
N.A.

S.D.E.O. (F) ATD
N.A.

31/11/94

Scale
Revised
S.D.E.O. (F) ATD
N.A.

(11)

Service
and
from 12-94 to 30-11-95
S.D.E.O. (Female)
N.A. Abbotabad

S.D.E.O. (F) ATD
N.A.

30/11/94

Drawn
S.D.E.O. (F) ATD
N.A.

S.D.E.O. (Female)
N.A. Abbotabad



Muhammad Ali Asif
Advocate

TIN

1	2	3	4	5	6	7	8
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 Act XVI C. & R.	Pay in substantive post	Additional Pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature
R.R.P.S							
Kagran	off temp		Rs 2381/-		P.M	1-12-94	S. 202
do	do		Rs 2478/-		P.M	1-12-95	S. 213
			BPS-NO-10-RS-370-42-1710				
do	do		Rs 954/-		P.M	1-7-90	S. 222
			Pre mature increment + 42 996				
do	do		Rs 1038/-		P.M	1-12-90	S. 227
			BPS-NO-10-RS-1230-79-2415				
do	do		Rs 1546/-		P.M	1-6-91	S. 232
do	do		Rs 1625/-		P.M	1-12-91	S. 237
do	do		Rs 1741/-		P.M	1-12-92	S. 242
do	do		Rs 1783/-		P.M	1-12-93	S. 247
			BPS-NO-10-RS-1660-107-3265				
do	do		Rs 2409/-		P.M	1-6-94	S. 252
do	do		Rs 2516/-		P.M	1-12-94	S. 257
do	do		Rs 2623/-		P.M	1-12-95	S. 262
do	do		Rs 2730/-		P.M	1-12-96	S. 267
do	do		Rs 2837/-		P.M	1-12-97	S. 272



Muhammad Ali Asif
[Address]

[Handwritten signature]

Muhammad Ali Aslam



D. H. Aslam
A. No. 2

Sub Divisional Education Officer (F) Abbottabad

3 Revised
A. 12213

SDE (F) HTD	N.H.	30/11	30/97	-do-	SDE (F) HTD	N.H.	30/97
SDE (F) HTD	N.H.	30/11	30/96	-do-	SDE (F) HTD	N.H.	30/96
SDE (F) HTD	N.H.	30/11	30/95	-do-	SDE (F) HTD	N.H.	30/95
SDE (F) HTD	N.H.	30/11	30/94	Increment	SDE (F) HTD	N.H.	30/94
SDE (F) HTD	N.H.	30/11	30/94	Revised	SDE (F) HTD	N.H.	30/94
SDE (F) HTD	N.H.	30/11	30/93	-do-	SDE (F) HTD	N.H.	30/93
SDE (F) HTD	N.H.	30/11	30/92	-do-	SDE (F) HTD	N.H.	30/92
SDE (F) HTD	N.H.	30/11	30/91	Increment	SDE (F) HTD	N.H.	30/91
SDE (F) HTD	N.H.	30/11	30/91	Revised	SDE (F) HTD	N.H.	30/91
SDE (F) HTD	N.H.	30/11	30/90	Increment	SDE (F) HTD	N.H.	30/90
SDE (F) HTD	N.H.	30/11	30/90	Revised	SDE (F) HTD	N.H.	30/90
SDE (F) HTD	N.H.	30/11	30/95	Increment	SDE (F) HTD	N.H.	30/95

B.P.S. 10 with 12/53 1/2
B.P.S. 7937-02

323 Divisional Education Officer
If Special Appointment

[Handwritten Signature]

Attached

Signature

323 Divisional Education Officer

Department
and may be fixed by the

only my pensioners gradually,
later on will be made good
of selection grade if details
as a result of increment award
on payment to make them
upto to the point that any
begin here by given on under

I sorry unable for E.P.S

Under Taking

323 Divisional Education Officer

[Handwritten Signature]

B.P.S. 10-10 Rs. 1660-107.3865 wide
Enlist No 3100 (3280-5 ND
by the DE (F) Primary HTD on
B.P.S. 10-10 1-7-90 on B.P.S. NO-10
Rs 870-42-1710.

Awarred Selection grade on

323 Divisional Education Officer

[Handwritten Signature]

re-formation of post list 1-7-90 under Rules 10 (3) Staff Report
exercises my option for

Administrative routing section with stamps and handwritten notes, including 'Sub Divisional Education Officer (Female) Abbottabad' and various office stamps.

1. Name of party
 2. Address of party
 3. Nature of business
 4. Date of appointment
 5. Signature of party

Revised Entries on Passing F.A. Exam

BPS-10 (1230-79-2415)

1862/2

21 1/93

1941/ =

1 12/93

Revised B.P.S. - 10 (1660-107-3265)

2623/ =

1 6/94

2730/ =

1 12/94

2837-00

1 12/95

2944-00

1 12/96

3051-00

1 12/97

3158-00

1 12/98

3265-00

1 12/99

B.P.S. - 11 (1725-116-3465)

3349-00

1 12/2000

3465-00

1 12/2001

(2490-160-7280)

Revised B.P.S. - 11 (2590-175-7840)

5210-00

1 12/2001

Cancelled



Muhammad Ali Asif
Advocate

Muhammad Ali Asif

Q. 1. Name of the person to whom the award is made.
A. Mr. Asif

Q. 2. Name of the person who made the award.
A. Mr. Asif

Q. 3. Name of the person who presented the award.
A. Mr. Asif

Q. 4. Name of the person who accepted the award.
A. Mr. Asif

Q. 5. Name of the person who presented the award.
A. Mr. Asif

Q. 6. Name of the person who presented the award.
A. Mr. Asif

Q. 7. Name of the person who presented the award.
A. Mr. Asif

Q. 8. Name of the person who presented the award.
A. Mr. Asif

Two Adv. increments
P.A.

[Signature]
Sub Divisional Education Officer (F) Abbottabad

(11) Service verified from 1-12-95 to 30-11-96 from acquittance rolls & other record kept in this office.

[Signature]
SDEO(F) A.Abad. N.A

(12) Service verified from 1-12-96 to 30-11-97 from acquittance rolls & other record kept in this office.

[Signature]
SDEO(F) A.Abad. N.A

(13) Service verified from 1-12-97 to 30-11-2001 from acquittance rolls & other record kept in this office.

[Signature]
SDEO(F) A.Abad. N.A

(14) Services verified from acquittance rolls and other record kept in this office from 1-12-2001 to 30-11-2002.

[Signature]
By P.O. (F) P.T. Abbottabad N.A

(15) Services verified from acquittance rolls and other record kept in this office from 1-12-2002 to 30-11-2003.

[Signature]
By P.O. (F) P.T. Abbottabad N.A

GPI Junction well
P.O. No 4304-5/3

Rs: 4600/-

[Signature]

More one from B-10 to B-11
TRR 48
9/3/04
N.D. 4304 - 05
N.D. 2300 - 05
wide T-458 dated 4/2004

TRR-68

[Signature]
9/13/2004



Muhammad Ali Asif
Advocate

[Signature]

Advocate
Muhammad Ali Asif



Handwritten signature or initials.

1-6-94	Rs. 2623/= Rm	u	u
1-12-93	Rs. 1941/= Rm RPS ID 1660-107-3265	u	u
21-1-93	Rs. 1862/= Rm	u	u
1-12-92	Rs. 1704/= Rm	u	u
1-12-91	Rs. 1625/= Rm	u	u
1-6-91	Rs. 1546/= Rm	u	u
1-12-90	Rs. 1038/= Rm RPS ID 1230-79-2415	u	u
1-7-90	Rs. 996/= Rm	u	u
1-12-2013	Rs. 4890/= Rm RPS ID 870-42-1710	u	u
1-12-2013	Rs. 3158/=	u	u
1-12-99	Rs. 3051/=	u	u
1-12-98	Rs. 2944/=	u	u
1-12-97	Rs. 2837/=	u	u

Handwritten note: Revised Rates Scales for 2001 RPS ID 3400-160-7290

Handwritten note: PTC Revised Rates RPS No. ID 1660-107-3265

1	2	3	4	5	6
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Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government	Government service available		
S. D. E. O. (F) Abbolabad	30-11-98	Annual Int. 1998	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-98	Annual Int. 1999	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-2000	Annual Int. 2000	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-2001	Scales Revised 2001	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-6-90	Revised Entries	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-90	Annual Int. 1990	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	31-5-91	Scales Revised 1991	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-91	Annual Int. 1991	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-92	Annual Int. 1992	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	20-1-93	Relaxed 2. Adv. Int. FA	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-93	Annual Int. 1993	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	31-5-94	Scales Revised 1994	S. D. E. O. (F) Abbolabad					
S. D. E. O. (F) Abbolabad	30-11-94	Annual Int. 1994	S. D. E. O. (F) Abbolabad					

13-12-2003 to 23-11-2004 (11 months) on full pay as per...
 21/11/2004 Entitled No. 1803
 Enter 26/01/2005 at 50%

S. Sult
 Dy. S.O. (F) P. Edu
 Abbolabad

S.P. Sanction Vcll.
 EDC (SIC) Abbolabad
 No. 2778788, dt. 06/05/14x
 amounting Rs. About 49

Dy. District Officer
 Primary Abbolabad

In account of 100%
 as per F. No. Abbolabad
 dt. 26.12.05
 at 5 12/5

Sanction
 1 Adv. Int.
 in FA

Service verified from...
 records kept in your office
 from 01-12-2003 to 30-11-2004



Muhammad Ali Asif
 Advocate

1	2	243	4	5	6	7	8
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 Art. 311 C. R. R.	Pay in substantive post	Additional Pay for officiating	Other emolument calling under the term "Pay"	Date of appointment	Signature of Government servant
<u>Revised Entries BPS-10 1660-101-3265.</u>							
Q908	A. T. P.		Rs. 2730/2 P.M			1.12.94	S. J. S.
u	u		Rs. 2837/2 P.M			1.12.95	S. J. S.
u	u		Rs. 2944/2 P.M			1.12.96	S. J. S.
u	u		Rs. 3051/2 P.M			1.12.97	S. J. S.
u	u		Rs. 3158/2 P.M			1.12.98	S. J. S.
PEPS CITY-ATD						3.12.98	S. J. S.
u	u		Rs. 3265/2 P.M			1.12.99	S. J. S.
<u>Revised Entries BPS-11 1725-116-3465.</u>							
u	u		Rs. 3349/2 P.M			1.12.2000	S. J. S.
u	u		Rs. 3465/2 P.M			1.12.2001	S. J. S.
<u>Scales Revised-2001 in BPS-10 2490-160-7290.</u>							
u	u		Rs. 5210/2 P.M			1.12.2001	S. J. S.
u	u		5374/ P.M			1.12.2002	S. J. S.
u	u		5530/ do			1.12.2003	S. J. S.
do	do		Rs- 5690/P.M			1.12.04	
<u>BPS-NO-10- Rs- 2865-185-8415</u>							
do	do		Rs- 6565/P.M			1.7.05	S. J. S.
do	do		Rs- 6750/P.M			1.12.05	S. J. S.




Muhammad Ali Asif
Advocate

(Handwritten signature)

Signature and designation of the head of the office or other attesting officer in attestation of column 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer
<i>[Signature]</i>	30.11.95	Annual Int-1995	<i>[Signature]</i>
<i>[Signature]</i>	30.11.96	Annual Int-1996	<i>[Signature]</i>
<i>[Signature]</i>	30.11.97	Annual Int-1997	<i>[Signature]</i>
<i>[Signature]</i>	3.12.98	To meet	<i>[Signature]</i>
<i>[Signature]</i>	30.11.98	Annual Int-1998	<i>[Signature]</i>
<i>[Signature]</i>	30.11.99	Annual Int-1999	<i>[Signature]</i>
<i>[Signature]</i>	30.11.2000	Maqa Ques	<i>[Signature]</i>
<i>[Signature]</i>	30.11.2001	Annual Int-2001	<i>[Signature]</i>
<i>[Signature]</i>	30.11.2001	DDQE AD Scales Raised 2001	<i>[Signature]</i>
<i>[Signature]</i>	30.11.2002	A/R	<i>[Signature]</i>
<i>[Signature]</i>	30.11.2003	do	<i>[Signature]</i>
<i>[Signature]</i>	30.11.2004	Annual Int-2004	<i>[Signature]</i>
<i>[Signature]</i>	30.11.05	Scale Revis	<i>[Signature]</i>
<i>[Signature]</i>	30.11.05	Annual Int-2005	<i>[Signature]</i>
<i>[Signature]</i>	30.11.06	Annual Int-2006	<i>[Signature]</i>

Leave	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
Nature and duration of leave taken Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government Government to which allocated	<i>[Signature]</i>	and other records kept in this office from 1-12-2004 to 30-11-2005 S Grade B-10 from 12/90 1991 (1) Pay fixed of 1546/- Pm in B-10 on 1-6-91 (2) Pay fixed of 2623/- Pm in B-10 on 1-6-94. M. Shah Accounts Officer (PFA)
Office of the Accountant General N.W.F.P. Peshawar Pay Fixed in the Revised Basic Pay Scales 2001 OF RS 2490-160-72-90 (10) AT RS 5210/- With Next Increment on PANNE.F. 112-2001 112-2002 Accounts Officer Pay Fixation Party N.W.F.P. Peshawar	<i>[Signature]</i>	
Office of the Accountant General N.W.F.P. Peshawar Pay Fixed in the revised basic pay scale 2005 of Rs. 2865-155-8415 (10) at Rs. 6565/- P.M on 01-07-2005 with next increment on 01-12-2005 Accounts Officer Pay Fixation Party N.W.F.P. Peshawar	<i>[Signature]</i>	


 Muhammad Ali Aslam
 Advocate

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 236 If officiating state (i) substantive appointment or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government Servant
GGPS city Acc. Imp/07		BPS-NO-10-RS 2865-185-8415					
			Rs. 6935/-	PM		1-12-08	<u>Seraj</u>
			BPS-10(3295-215-9745)				
			Rs. 8025/-	PM		1-7-07	<u>Seraj</u>
			Rs. 8240/-	PM		1-12-07	<u>Seraj</u>
			Empl. Revised - B-12(3630-260-11430)				
			Rs. 8310/-	PM		1-10-07	<u>Seraj</u>
			Rs. 8350/-	PM		1-7-07	<u>Seraj</u>
			Rs. 8310/-	PM		1-12-07	<u>Seraj</u>
			BPS-12(4355-310-13655)				
			Rs. 9935/-	PM		1-7-08	<u>Seraj</u>
			Rs. 10245/-	PM		1-12-08	<u>Seraj</u>

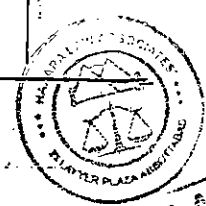
2007
 OFFICE OF THE ACCOUNTANT GENERAL
 N.W.F.P. PESHAWAR
 PAY FIXED IN THE REVISIONED BASIC
 PAY SCALES
 OF RS 2255-215-9745 (A-10)
 AT RS 8225/- P.M.W.E.F. 1-07-2007
 With Next increment on 1-12-2007

Accounts Officer
 Pay Fixation Party N.W.F.P. Peshawar

2008
 OFFICE OF THE ACCOUNTANT GENERAL
 N.W.F.P. PESHAWAR
 PAY FIXED IN THE REVISIONED BASIC
 PAY SCALES 1
 OF RS 4355-310-13655 (12)
 AT RS 9935/- P.M.W.E.F. 1-07-2008
 With Next increment on 1-12-2008

Accounts Officer
 Pay Fixation Party N.W.F.P. Peshawar

Rs. 10245/- PM 1-12-08



Muhammad Ali Ashraf
 Adjuvant

[Handwritten signature]

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded proceedings or award or order of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upon four months for which leave salary is debitable to another Government		
(F) Pvy Edu Abbottabad	30-6-07	Scale Revised	By D.O. (18) Pvy Edu Abbottabad	10			Service verified from the quittance rolls and other records in this office from 1-12-2005 to 30-11-06
By D.O. (F) Pvy Edu Abbottabad	30-11-07	M/M	By D.O. (13) Pvy Edu Abbottabad			Female Primary Education Abbottabad	
By D.O. (F) Pvy Edu Abbottabad	26-1-08	Scale upgraded	By D.O. (48) Pvy Edu Abbottabad				CAPE Sanction with BDC S/L No 17661-62 dated 23/8/07 Rs 6400/-
By D.O. (F) Pvy Edu Abbottabad	30-11-07	M/M	By D.O. (13) Pvy Edu Abbottabad				
By D.O. (F) Pvy Edu Abbottabad	30-6-07	Scale Revised	By D.O. (13) Pvy Edu Abbottabad				
By D.O. (F) Pvy Edu Abbottabad	30-11-08	Scale A/L	By D.O. (23) Pvy Edu Abbottabad	19			Service Verified From the Accy Roll/Other Official Record w.e.f. 1-12-06 to 30-11-07

Service Verified From the Accy Roll/Other Official Record w.e.f. 1-12-06 to 30-11-07

[Signature]
D. Dist. Officer
(F) Primary Abbottabad

Allowed Rs. 12 sep 1-10-07 being more for 10 years service vide Govt. of NWFP FD No. FD/50 (PR) 10-24/2007 dated 26-1-08.

[Signature]
D. Dist. Officer
(F) Primary Abbottabad

S 77
12/11/09
Drawn amount of pay less drawn w/y 1/7/90 to 30/9/08 amounting to Rs. 56166/-

[Signature]
20/11/09

[Signature]
TIA Abbottabad

Muhammad Ali Asif
Advocate

1	2	3	4	5	6	7	8
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 Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the terms of pay	Date of appointment	Signature of Government servant

B.P.S - 12 (1355 - 310 - 13655)

G.P.S CMS
Muz P.W

Rs - 10245 / P.m 1-12-08 S. J. 03

Rs - 10555 / P.M 1-12-09 S. J. 03

Rs 10865 / P.M 1-12-2010 S. J. 03
B/2 (7000 - 500 - 22000)

17500 / 7-12-2011 S. J. 03

Basic Pay Scales 2011
Office of The Accountant General
Khyber Pakhtun Khawa, Peshawar
Pay Fixed in R.B.P.S. 2011
of Rs 7000 - 500 - 22000
At Rs 17500 P.M.W.F.E
Withward increment on

12

18000 / 1-12-2011 S. J. 03

18500 / 1-12-2012 S. J. 03

Man Ghuman
Accounts Officer
Pay Fixation Party K. Pakhtun Khawa
Peshawar

Promoted as SPST BPS 14 (8000 - 610 - 26300)

G.P.S
city A.C.H

Temp/off 18980 / 1-3-2013 S. J. 03

Promoted as DSHI BPS - 15 (8500 - 700 - 29500)

G.P.S
city A.C.H

Temp/off 19000 + 700 Re mature 19700 / 2-3-2013 S. J. 03



Muhammad Ali Asif
Advocate

(Handwritten signature)

Name and Designation of the officer for attestation releases 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		
				Period	Government to which debitible		
D.O. (F) Pry. Edu. Abbottabad	30/11/08	A/Super	[Signature]				
[Signature]	30/11/2010	A/Super	[Signature]				
[Signature]	30/11/2011	S/R	[Signature]				
[Signature]	30/11/2011	A/Super	[Signature]				
[Signature]	30/11/2012	A/Super	[Signature]				
[Signature]	3/2013	Promoted as S.P.S.I BPS-14	[Signature]				
[Signature]	3/2013	Promoted as P.S.H.T BPS-15	[Signature]				
[Signature]	3/2013	Promoted as P.S.H.T BPS-15	[Signature]				
[Signature]	3/2013	Promoted as P.S.H.T BPS-15	[Signature]				

70 Service verified from a quitance rolls and other record kept in this office from 01-12-07 to 30-11-08

Dy. D.O (F) Pry: Edu Abbottabad

21 Service Verified From the Record w/q 1-12-08 to 30-11-08

D.O. (F) Pry Edu Abbottabad

GPF Adv: amounting to Rs. 39,000/- (Refundable) has been sanctioned by the E.D.O (E+SE) A/Abad vide Emds: No. 18529-30 dt: 29/12/2010.

Dy. Dist. Officer (F) Primary Abbottabad

TWR 4/16 01-1-2011

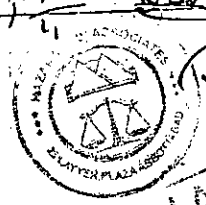
Drawn Rs=39000/- vide T6828-29 Ad GPF Adv dt: 31/12/10

22 Service Verified From the Act: R: Other Official Record w/q 1-12-08 to 30-11-2010



Muhammad Ali Ashraf Advocate

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Act 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument (allowance under the term "Pay")	7 Date of appointment	8 Signature Government served
<i>Revised Entries</i>							
B-7 3255-25-9745		-	8025	-		12/07	Sc 203
B 12 3630-260-11430							
"			810			1/10/07	Sc 203
"			8570			1/12/07	Sc 203
B 12 4355-310-13655			10245			1/2/05	Sc 203
"			10555			1/12/08	Sc 203
"			10805			1/12/07	Sc 203
"			11175			1/12/10	Sc 203
B 12 7000-300-22000			18000			1/2/11	Sc 203
"			18500			1/12/11	Sc 203
"			19000			1/12/12	Sc 203
B 12 8500-700-29500			20400			1/3/13	Sc 203
"			21100			1/12/13	Sc 203
"			21800			1/12/14	Sc 203



Muhammad Ali Asif
Advocate

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Name and duration of leave taken	14 Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	15 Signature of the head of the office or other attesting officer	16 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
	30/7	Scale 2	Sub Divisional Education Officer (F) Abbottabad		Sanction of GPF		Sub Divisional Education Officer (F) Abbottabad
	30/8/7	Scale 1	Sub Divisional Education Officer (F) Abbottabad		Non-Refusable amount vide EDO (ESSE) Abbottabad under Endst-110-12918/12-11/11/F dt 27/12/2011		
	30/9/07	Ann	Sub Divisional Education Officer (F) Abbottabad		Service Verified From the Adq: Roll/Other Official Record w.e.f. 1-12-2011 to 30-11-2012	By: Dist. Officer Primary Education Abbottabad	
	30/10/08	Scale 2	Sub Divisional Education Officer (F) Abbottabad		7500/- 22/12		B. 50000/- cur N. Refusal Able
	30/11/08	Ann	Sub Divisional Education Officer (F) Abbottabad		NOTIFICATION Promoted vide G.O. dt 12/18-54 Date: 14/11/08 G.O. dt 14/11/08		
	30/11/10						
	30/11/11	Scale 2	Sub Divisional Education Officer (F) Abbottabad			Sub: Divisional Education Officer (F) Abbottabad	
	30/11/12	Ann	Sub Divisional Education Officer (F) Abbottabad				
	28/2/13	Scale 1	Sub Divisional Education Officer (F) Abbottabad		NOTIFICATION Promoted vide G.O. dt 15/15/13 Date: 15/11/13 G.O. dt 15/11/13		
	30/11/13	Ann	Sub Divisional Education Officer (F) Abbottabad		3-3-2013		
	30/11/14	20/12/2015	Sub Divisional Education Officer (F) Abbottabad			Sub: Divisional Education Officer (F) Abbottabad	

Muhammad Ali As
Advocate

32

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 Art. 371 C. S. R.

Pay in substantive post

Additional Pay for officiating

Other emolument falling under the term "Pay"

Date of appointment

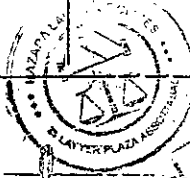
Signature of Government servant



Muhammad Ali Azeem
Advocate

Muhammad Ali Azeem

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation (columns 1 to 8)	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Period	Government to which debitale		
						<p>235 S 287A</p>	
						<p>Payment @ P. 19750/- BPS-15-4 Duration of pay of Adm. up 27/10/2013 to 30/9/2013 * to BPS 12000/-</p>	
						<p>District Account Officer Abbottabad</p>	
						<p>Service Verified From the Acq: Roll/Other Official Record w.e.f. 1-12-2012 to 30-11-14</p>	
						<p>Sub Divisional Education Officer (F) Abbottabad</p>	
						<p>Service Verified From the Acq: Roll/Other Official Record w.e.f. 1-12-14 to 28-2-15</p>	
						<p>Sub Divisional Education Officer (F) Abbottabad</p>	


 Muhammad Ali Asif
 Advocate

(For use in Police and other similar Departments).

RECORD OF POSTINGS.

District and post	No. of District Order	Date	District and post	No. of District Order	Date



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Muhammad Ali Asif
 Adresser

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

REVERSE ORDER

Consequent upon the recommendation of the Departmental Promotion Committee and in the pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No.SO(B&A)/1-8/ E&SE/2012 dated 11/07/2012 and Finance Department Endorsement No.SO (FR)/ FD/10-22(E) /2010 dated 16/07/2012, the Female senior PSTs BPS-14 are hereby promoted to the post of Senior Primary School Head Teacher BPS-15 (Rs-8500-7000-29500) Plus usual allowances as admissible under the rules on the regular basis under the existing recruitment policy of the Provincial Govt. Notified vide No.SO(PE)14-5/SSRC/Meeting/2012 teaching cadre dated 13/11/2012 on the terms and conditions given below with immediate effect in the interest of public service.

S.No.	Sen L.No.	NAME OF TEACHER	Present School	Present Circle	Promoted and posted as PSHT BPS-15	Posting Circle
1	3	Khalida Bibi	GGPS Kunj School ATD	ATD	GGPS Kunj School ATD	ATD
2	7	Rashida Bagum	GGPS Salhad ATD	ATD	GGPS Salhad ATD	ATD
3	10	Rashida Naqvi	GGPS Bhandra Sher Khan	Qalandarabad	GGPS Bhandra Sher Khan	Qalandarabad
4	18	Perveen Akhtar	GGPS Maira Khurd	Nathia Gali	GGPS Pam Sarf	Nathia Gali
5	22	Balqees Akhtar	GGPS Havelian Station	Havelian	GGPS Havelian Station	Havelian
6	24	Gulfaraz bibi	G.G.P.S Havelian village	Havelian	G.G.P.S Havelian village	Havelian
7	29	Shahnaz Begum	GGPS Barseen	Havelian	GGPS BARSEEN	Havelian
8	31	Chan Bahar	GGPS Changali	Boi	GGPS Changali	Boi
9	34	Bibi Asia Khatoon	GGPS Kunj	ATD	GGPS Dheri	ATD
10	35	Nazma Shaheen	GGPS BAMLIAL ATD	ATD	GGPS BAMLIAL ATD	ATD
11	41	Azra Bibi	GGPS Kunj	ATD	GGPS Choona	ATD
12	43	Bibi Zenib	G.G.P.S Sultanpur	Havelian	G.G.P.S Sultanpur	Havelian
13	46	Sajida Bibi	GGPS Kangar Wali Masjid	Havelian	GGPS Kangar Wali Masjid	Havelian
14	47	Abida Shaheen	GGPS Thanda Choa ATD	ATD	GGPS Thanda Choa ATD	ATD
15	49	Seroz Martha	GGCMS Mirpur	ATD	GGPS Maira Tall	ATD
16	50	Thalat Nazneen	GGCMS Mirpur	ATD	GGPS Baram Gali	ATD
17	51	Arifa Hamid	GGPS City School ATD	ATD	GGPS City School ATD	ATD
18	54	Rukhsana Jabeen	GGPS Nawanshehr NO-1 ATD	ATD	GGPS Nawanshehr NO-1 ATD	ATD
19	55	Aliya Mazhar	GGPS Kahu	Birote	GGPS Kahu	Birote
20	63	Rasheeda Begum	GGPS Sumandar Katha	Nathia Gali	GGPS Sumandar Katha	Nathia Gali
21	64	Parveen Akhtar	G.G.P.S havelian	Havelian	GGPS Lunday	Havelian
22	65	Khalida Shaheen	GGPS NO-3 Malikpura ATD	ATD	GGPS NO-3 Malikpura ATD	ATD
23	67	GULNAZ	GGPS Bagh	Dhamtour	GGPS Bagh	Dhamtour
24	71	Shaheen Qureshi	GGPS Sher Bi Syedian	Sherwan	GGPS Sher Bi Syedian	Sherwan
25	74	Naheed Akhter	GGPS Tarnutian	Birote	GGPS Hill Birote	Birote
26	78	Bibi Zainab	GGPS Bhandra Ali Khan	Qalandarabad	GGPS Bhandra Ali Khan	Qalandarabad
27	85	Abida Bagum	GGPS Malikpura NO-1 ATD	ATD	GGPS Malikpura NO-1 ATD	ATD
28	87	Bibi Pervaiz	GGPS Banda Sinjhan ATD	ATD	GGPS Banda Sinjhan ATD	ATD
29	93	Safdar Bibi	GGPS Jansa	Nathia Gali	GGPS Jansa	Nathia Gali
30	95	Fehmida Sultana	GGPS Upper Kehal ATD	ATD	GGPS I/ Kot No.1	ATD, SSC, Lora
31	104	Arbila Bibi	GGPS Kothiala	Sherwan	GGPS Kothiala	Sherwan
32	107	Nasim Akhtar	GGPS Ghambeer	Lora	GGPS Ghambeer	Lora
33	111	Zakia Shaheen	GGPS Pathan Khurd	Boi	GGPS Pathan Khurd	Boi
34	112	Safina Bibi	GGPS Bandi Chamyali	Boi	GGPS Bandi Chamyali	Boi

ANNEXURE B

S.No.	Sen L.No.	NAME OF TEACHER	Present School	Present Circle	Promoted and psoted as PSHT BPS-15	Posting Circle
293	830	Naveeda Bano	GGPS Sheikh-ul-Band. NO-1 ATD	ATD	GGPS Jatat	ATD
294	832	Hamida Bagum	GGPS Mamdah	Havelian	GGPS Tatreela	Nathia Gali
295	835	NUSRAT JABEEN	GGPS Chattri	Dhamtour	GGPS Kalas Chattri	Dhamtour
296	837	ASIA BIBI	CMS Danna	Dhamtour	GGPS Bandi Mansoor	Dhamtour
297	838	Qaisara Bano	GGPS Mor Kalan	Qalandarabad	GGPS Tannan	Qalandarabad
298	839	Ayesha Jabeen	GGPS Maira Bagh	Nathia Gali	GGPS Maira Bagh	Nathia Gali
299	840	Zahira Gul	GGPS Salhad ATD	ATD	GGPS Dong Malach	Birote
300	841	Koser Tabassum	GGPS Geh Bagnotar	Nathia Gali	GGPS Geh Bagnotar	Nathia Gali
301	842	Naheed Gul	GGPS karimpura	ATD	GGPS karimpura	ATD
302	843	Shazia Iqbal	GGPS Maira Payeen	Hajia Gali	GGPS Bodla	Hajia Gali
303	845	Rukhsana Sadiq	GGPS Chattr Nath	Nathia Gali	GGPS Chattr Nath	Nathia Gali
304	847	Shamim Akhtar	GGPS Karatch #1	Hajia Gali	GGPS Karatch #1	Hajia Gali
305	848	Shaista Bibi	GGPS Bhandi Ali Khan	Qalandarabad	GGPS Riala	Qalandarabad
306	849	Aqeela Taj	GGPS Sharwan Kalan	Sherwan	GGPS Sherwan Khurd	Sherwan
307	850	Nighat Shaheen	GGPS Malikpura No.1 ATD	ATD	GGPS Turk Abad	Sherwan
308	851	Safia Bibi	GGPS Upper Kehal ATD	ATD	GGPS Nakar Majwal	Birote
309	853	Gul Bahar	GGPS Bandi Maira	Nathia Gali	GGPS Chamb Rajpool	Nathia Gali
310	854	Parveen Akhter	GGPS Musa Zai Colony ATD	ATD	GGPS Musa Zai Colony ATD	ATD
311	855	Rubina Shaheen	GGPS NO-2 Nawanshehr ATD	ATD	GGPS NO-2 Nawanshehr ATD	ATD
312	856	Shazia Afsar	GGPS Gari Phulgran	Havelian	GGPS Gari Phulgran	Havelian
313	857	Shaheen Akhter	GGPS Sangal	Birote	GGPS Sangal	Birote
314	858	SHAGUFTA BIBI	GGPS Chattri	Dhamtour	GGPS Chattri	Dhamtour
315	859	Shabana	GGPS Tarhana	Qalandarabad	GGPS Murda Pattian	Qalandarabad
316	860	Nabeela khaton	G.G.P.S kiala	Havelian	GGPS Kiala	Havelian
317	862	Lubna Bano	GGPS Basali ATD	ATD	GGPS Basali ATD	ATD
318	863	Rehana Khalil	GGPS Gharhi	Lora	GGPS Gharhi	Lora
319	865	SHAHZIA AKHTAR	CMS Danna	Dhamtour	GGPS Bannlan	Dhamtour
320	867	Tahira bibi	G.G.P.S Salwala	Havelian	GGPS Chanja	Hajia Gali
321	868	SHAZIA MALIK	GGPS Kuthwal	Dhamtour	GGPS Gali Banlan	Dhamtour
322	869	Nusrat Bano	GGPS Nagri Bala	Nathia Gali	GGPS Nagri Bala	Nathia Gali
323	870	Sajida Nazir	GGPS Kholiala	Sherwan	GGPS Bacha Sani	Sherwan
324	873	Jameela Bibi	GGPS Moolia	Birote	GGPS Moolia	Birote
325	875	RIFFAT JABEEN	GGPS Banda Bazda	Dhamtour	GGPS Banda Bazdar	Dhamtour
326	876	Chman Ara	GGPS KNGAR WALI MSJID	Havelian	GGPS Masah Golri	Hajia Gali
327	877	Saima Qaisar	GGPS Samwala	Hajia Gali	GGPS Samwala	Hajia Gali
328	878	Amraiza Khatoon	GGPS Nurdaba ATD	ATD	GGPS Nurdaba ATD	ATD
329	880	Shazia Bibi	G.G.P.S Guggun	Havelian	GGPS GGPS Guggun	Havelian
330	881	Nazia Bibi	GGPS Keri Kutly	Lora	GGPS Keri Kutly	Lora
331	883	Aisha Bibi	GGPS Moolia	Birote	GGPS Bali Kot	Birote
332	884	Ghazala Bibi	GGPS Mara Phagla	Qalandarabad	GGPS Shamshair Naka	Qalandarabad
333	885	Shabana Bibi	GGPS Akhora	Qalandarabad	GGPS Akhora	Qalandarabad
334	886	Safina Matloob	GGPS Hari De Far	Qalandarabad	GGPS Hari De Ban	Qalandarabad
335	887	Farzana Bibi	GGPS Dakhan Tatreela	Nathia Gali	GGPS Dakhan Tatreela	Nathia Gali

محترم جناب ایس۔ ڈی۔ او صاحب
ذرائع مدارس اسٹاپ

جناب عالی!

گذشتہ ہے سائلہ علمہ نیا میں

پچھلے 31 سال سے ملازمت بحیثیت P.S.H.T.

کر رہی ہے۔ جناب عالی گذشتہ 4 ماہ سے

سائلہ سائنس کی تعلیم اور درجہ

عرق النساء میں مبتلا ہے اور بستر و علاج پر

ہے۔ اسے قابل تہیت نبرد ملازمت کر سکے۔

برائے ہر باقی سائلہ کو Retained صرف 3/1 اور

365 PR کے لئے دی جائے۔ سائلہ بچہ شکور و منجی ہوگی

الموافق 15/3/2015

الصارف

ایرو زمار طبقا P.S.H.T

En. b. P.S. Progen Meer
Abbottabad

Sony Marwaha

محترمہ ایس۔ ڈی۔ او صاحبہ
بڑی خوشی سے دفتر کو
میں

Miss
S. S. Juganna
Abbottabad

15/3/2015



Muhammad Ali A
Advocate

Handwritten signature

مدرسہ خلیفہ ابراہیم، انیسویں صدی
ذکارہ ملازمت

ANNEXURE

خواب عالی (D)

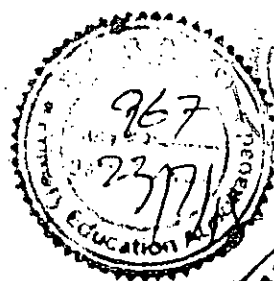
لذا رش ہے کہ سائلہ نے اپنے ذمہ
سایہ عکس میں 29 سال ملازمت کی ہے۔
خواب عالی برفہ بہاری سائلہ ملازمت کے
آخری 2 سال ٹاپے بٹاپے درخواست ہوائے چھٹی
بھرتی دی تھی نہ جانے کیوں منعقد ہوئی تھی
کیا گیا بلکہ سائلہ کو Account قرار دے دیا گیا
خواب سے التماس ہے کہ سائلہ کے اس

عہدہ کو 3/3/2013 تا 25/2/2014 E.O.L / on half pay
اور 26/2/2014 تا 31/1/2015 LPR

پتہ دی جائے۔ سائلہ اور اسکے اہل خانہ تالیف
دعا گو رہے اور سائلہ کو 3/3/2015 سے ریٹائرمنٹ
لا دیکر کر دیا جائے

الکافی
مہارٹھ سیرونگل

محلہ ... P.S. Bogota
23/7/2015



Muhammad Ali Asif
Advocate

39

ANNEXURE 'E'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

SANCTION FOR RETIREMENT.

Mst: Seeroze Martha, PSHT, BPS-15, GGPS, Jogan Mar, Abbottabad is hereby allowed premature retirement from service with effect from 01-03-2015 (AN) with the following condition.

1. Her absence period w.e.f. 03-03-2013 to 31-01-2015 (700 days) is hereby treated as E.O.L. without pay.
2. Necessary entry to this effect should be made in her service book.
3. Recovery of absent period w.e.f. 03-03-2013 to 31-01-2015 (700 days) amounting Rs 868428/- made from her pension/gratuity etc.

-Sd-

**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.**

Endst: NO. 9924-25 /EB-I /R/Cases Vol: 01 Dated A.Abad the 12 / 8 /15.

Copy to the:

1. The S.D.E.O. (F) Primary Abbottabad with reference to her No. 1185 dated 27-07-2015 a/w service book.
2. The District Accounts Officer Abbottabad.

M. Bashir
Pl. do the needful
13/8/15

Seeroze Martha
**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.**



Muhammad Ali Asif

**Muhammad Ali Asif
Advocate**

ANNEXURE (F)

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (زبانہ) ایسٹ ایلڈ

اپیل براد ضیہ کے لیے جاسے Pension Case لیسڈ کا بیڈ
ٹیچر گورنمنٹ گریڈ سیرٹری سکول جوگن مار سیرکل سیروان
مارقا سیرور دستہ ولیم عنایت گل آفیسر P.H.S.A.

جناب عالی . اپیل ذیل عرض ہے ۔

1: یہ کہ سائلہ محکمہ تعلیم میں بطور P.H.S.A اپنے زائقن سرانجام دینے کے
لیڈ یکم مارچ 2015 کی ریٹائرمنٹ کی درخواست حورفر $\frac{3}{15}$ 15 کو داخل کی
فولڈ منتقل درخواست گئی ہے ۔

2: یہ کہ گورنمنٹ آرڈر کے مطابق پینشن کیسینر صبرہ کا اور صوبہ خیر ختون
خوا کے حکم کے مطابق Pension Case درخواست کے فوراً لیسڈ Speedy ہونا
چاہیے مگر سائلہ کے کیس میں ابھی تک کوئی پینشن رقت نہ ہوئی ہے ۔

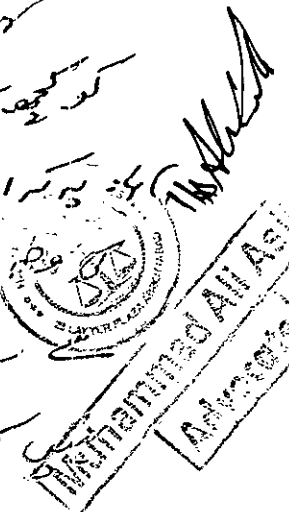
3: یہ کہ سائلہ نے دوران Service اپنی ڈیوٹی احسن طرہ لقمہ سے سرانجام دی ہے
اور لوبد ازاں کچھ نامعلوم وجوہات کی بنا پر سائلہ کچھ دنوں تک سکول نہ جانی
سائلہ نے Even Leave کیسٹے استیلا کیا اور بد قسمتی کے کاپی اپنے
پاس نہ رکھ سکی سائلہ نے حکم کے کیسیر کے بیڈ سائلہ اپنی ڈیوٹی
Regular ہوئی سائلہ کی تنخواہ بند نہ ہوئی تو کہیں بھی سائلہ
کو کچھ بھی علم نہ ہو سکا ۔

4: یہ کہ سائلہ کے علم میں آیا ہے کہ سائلہ کا کیس اس
میں گرت گیا ہے ۔ جبکہ سائلہ نے اپنی ڈیوٹی احسن طرہ لقمہ
سرانجام دی ہے تمام عرصہ مدت خدمت میں کوئی بھی جھٹی

کیس اس سائلہ کی Absency کو Government Rules کے

مطابق With Pay میں کرتے ہوئے سائلہ کا کیس
Final کرتے ہوئے سائلہ کے پینشن کیس کا ضیہ

کیا جائے ۔ اگر کوئی Rules آرڈر آ رہا ہے تو
P.T.O. - Contn.



اسد عرصہ کی وقتی Deduction کرتے ہوئے سالانہ کے
 نیشن کیس کا فیصلہ کیا جائے۔

5 = یہ کہ سالانہ اقلیتی کوٹے پر بھرتی ہوئی اور تعداد میں بھی
 کم ہیں۔ کچھ شہر سید عینا صدر سالانہ کی Pension Case
 میں رکاوٹ بنتے ہوئے ہیں ان تمام تر کے باوجود سالانہ سید
 کا حاض یا جو سے نہیں چھوڑا بلکہ سالانہ کے case کو صدمہ ہی
 لکھنا میں تبدیل کرنا چاہتے ہیں۔

6 = یہ کہ سالانہ پاکستان کی پیرامن سیر ہے اور قانون کا احترام
 کرتی ہے اور دوسری پاکستانیوں کی طرح برابر حقوق رکھتی
 ہے اور گورنمنٹ سروس رولز کے مطابق سالانہ کے ساتھ
 مساویانہ سلوک رکھتے ہوئے Accordance و بدلتا حصہ
 70 rules

نیشن کا فیصلہ کیا جائے
 20/11/2023

مارچا سپروز دفتر و لیم عنایت گل

P. H. S. T.

جوگن ہار GGP سٹریٹ سیوان ایب آباد

کاپی برائے:

1: سیکرٹری پرائمری ایجوکیشن یس اور KPK

2: ڈائریکٹر ایجوکیشن یس اور KPK

3: کمشنر حزارہ

4: ڈپٹی کمشنر ایب آباد

محمد علی اسحاق



Muhammad Ali Asif
 Advocate

ANNEXURE 'G'

بکھنور جناب ڈائریکٹر صاحب نظامت تعلیمات صوبہ خیبر پختونخواہ پشاور

محکمانہ اپیل بر خلاف آرڈر Sanction for Retirement

عنوان

نمبر-1-EB-1/R.Cases Vol-9924-25 مورخہ 12/08/2015

جناب عالی موجبات اپیل ذیل عرض ہیں۔

1- یہ کہ سالکہ محکمہ تعلیم ایبٹ آباد میں بطور PHST اپنے فرائض احسن طریقے سے سرانجام دیتی رہی ہے۔ سالکہ اقلیتی کوٹہ پر بھرتی ہوئی تھی اور سالکہ/اپیلانٹ نے اپنی تمام سروس احسن طریقے سے سرانجام دی اور سالکہ کے خلاف کبھی کوئی شکایت نہ ہوئی اور نہ ہی تمام سروس میں سالکہ/اپیلانٹ کے خلاف کوئی محکمانہ کارروائی ہوئی۔ سالکہ کی سروس بک اس بات کا ثبوت ہے جو لف اپیل ہذا ہے۔

2- یہ کہ سالکہ/اپیلانٹ نے اپنی مدت ملازمت کے دوران اپنی Retirement کے لیے درخواست محکمہ کو گزاری تو سالکہ/اپیلانٹ کو کہا گیا کہ تم 2 سال سے Absent ہو جبکہ اسی دوران بحوالہ چٹھی نمبر SO(FR)FD/10-22(E)2010 مورخہ 16/07/2012 کے تحت BPS-14 میں اور BPS-15 SPHT میں پروموٹ کر کے عرصہ 30/09/2013 تا 02/03/2013 تک کا Arrears مبلغ-12440/ Rs. کا سالکہ کو دیا گیا اگر سالکہ Absent تھی تو اس وقت سالکہ/اپیلانٹ کے خلاف کارروائی عمل میں کیوں نہیں لائی گئی۔ Draw Arrear ہونا سالکہ/اپیلانٹ کی ایمانداری کا ثبوت ہے اور سالکہ کی پنشن میں رکاوٹ محض سالکہ/اپیلانٹ کے اقلیتی ہونے کی سزا ہے اور سالکہ کو آئینی اور قانونی حق سے محروم رکھنا ہے۔

3- یہ کہ سالکہ/اپیلانٹ نے اپنی سروس کے آخری سالوں میں بوجہ بیماری درخواست ہائے دیں مگر سالکہ/اپیلانٹ کے علم میں کوئی بات نہ لائی گئی اور نہ ہی سالکہ/اپیلانٹ کے خلاف کوئی ایسا Explanation جاری ہوا جس سے سالکہ/اپیلانٹ کو اپنے خلاف کسی کارروائی کا علم ہو۔ Non-Gazetted سرکاری ملازمین کی Service Book آفس ہی میں رہتی ہے اور اس میں تمام کارروائی دفتر کے اہلکار/افسر مجاز ہی کرتے ہیں دوران سروس تو ایسا کوئی حکم سالکہ کو نہ ملا اور نہ ہی سالکہ کی سروس بک میں تنخواہ کی بندش کے حوالے سے کوئی انٹری ہے اور نہ ہی Account Office کو

Mohammad Ali Ak
Account Office

کسی چٹھی کے ذریعے سائلہ کے Absent ہونے کی اطلاع دی گئی اور نہ ہی کسی اور ذرائع سے سائلہ کو کسی چٹھی کے ذریعے سائلہ کے Absent ہونے کی اطلاع دی گئی اور نہ ہی کسی اور ذرائع سے سائلہ کو Show cause/Explanation letter بھیجا گیا۔ سروس کے آخری ایام میں درخواست برائے پنشن دینے کے بعد محض کسی بہکاوے میں آتے ہوئے انتقامی کارروائی کی گئی ہے جو کہ منی بر بدینتی، خلاف قانون، خلاف واقعات و خلاف آئین پاکستان ہے۔ درخواست پنشن لف ہمراہ اپیل ہذا ہے۔

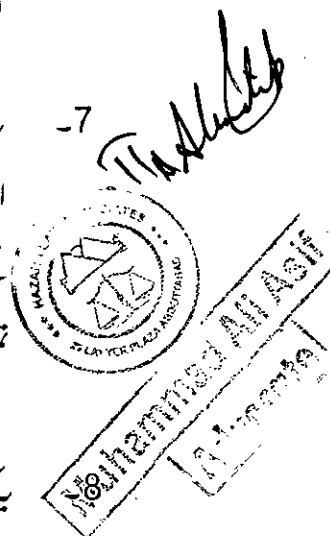
4- یہ کہ بعد از دیے جانے Sanction برائے ریٹائرمنٹ سائلہ/اپیلانٹ کا کیس نہ جانے کن وجوہات کی بناء پر دبا یا جانے لگا۔ دفتر کے چکر کاٹنے اور مسلسل 5 ماہ تک خوار ہونے کے بعد سائلہ/اپیلانٹ کے علم میں لایا گیا کہ آپ غیر حاضر رہی ہیں۔ آپ کے خلاف کارروائی کی جائے گی۔ اپیلانٹ کی درخواست برائے ریٹائرمنٹ کے بعد DEO(F) صاحبہ نے کس منطق کے تحت اپیلانٹ کے خلاف انکوائری کا حکم دیا۔ انکوائری افسر مقرر کی گئی مگر اس انکوائری رپورٹ کو بھی منظر عام پر نہ لایا گیا۔ درخواست چٹھی برائے Sanction نمبر 47-9246 مورخہ 09/07/2015 بذریعہ Approval Note Sheet جاری کی گئی مگر اس پر کوئی عمل درآمد نہ کیا گیا بلکہ اس چٹھی کو نہ جانے کن وجوہات کی بناء پر ریکارڈ سے غائب کر دیا گیا اور سائلہ/اپیلانٹ کو اس بارے میں کوئی علم نہ ہو سکا بلکہ Sanction Letter میں اس کا حوالہ تک نہ دیا گیا۔

5- یہ کہ اپیلانٹ کے بار بار اصرار پر سائلہ/اپیلانٹ سے اقلیتی ہونے کی بناء پر سوتیلی ماں کا سلوک روا رکھا گیا جیسے کہ اپیلانٹ پاکستان کی شہری ہی نہ ہو۔ سائلہ/اپیلانٹ کے دفتر میں سرکاری کام میں مسلسل رکاوٹ ڈالی گئی اور سائلہ/اپیلانٹ کو اس کا جائز حق نہ دیا گیا۔ اور آئینی حق سے محروم رکھا گیا۔

6- یہ کہ دوران سروس سائلہ کے خلاف کوئی قانونی کارروائی نہ کی گئی نہ ہی کبھی Warning کی گئی نہ ہی Explanation ہوئی جو کہ سائلہ کی ایمانداری کا واضح ثبوت ہے۔

7- یہ کہ سائلہ کے پنشن کیس میں رکاوٹ کا علم ہونے پر سائلہ نے اپیل بھی دائر کی کہ اگر محکمہ سائلہ کے خلاف اس کام کی کارروائی جو کہ سائلہ نے نہ کیا کا ارادہ رکھتا ہے تو سائلہ کی Absent کو Service Rule کے تحت Leave with pay میں تبدیل کرتے ہوئے سائلہ کے کیس کی رکاوٹ کو دور کرے مگر اس تمام تر کے باوجود کوئی مثبت فیصلہ نہ کیا گیا۔ اپیل نسبت پنشن کیس لف اپیل ہذا ہے۔

یہ کہ مسلسل Delaying Tactics اور بہتان کے بعد سائلہ/اپیلانٹ کے خلاف آرڈر



نمبر 9924-25 مورخہ 12/08/2015 جاری کیا گیا جس میں سائل کو اس کے بنیادی حقوق سے محروم کر دیا گیا اور اپیلانٹ کے خلاف Recovery ڈال دی گئی جو کہ سراسر غلط، خلاف قانون، خلاف واقعات اور مبنی بر بد نیتی ہے اور اس کے آئینی حقوق سے بھی محروم رکھنے کے مترادف ہے۔

9- یہ کہ سائل کے خلاف کبھی بھی کوئی محکمانہ کارروائی نہ ہوئی جو کہ سائل کی ایمانداری کا واضح ثبوت ہے۔ آرڈر نمبر 9924-25 مورخہ 12/08/2015 جاری کر کے اس کے بنیادی حقوق سے محروم کر دیا گیا اور پنشن سائل کا بنیادی حق ہے اور جاری کردہ letter No. 9924-25 مورخہ 12/08/2015 بر خلاف قانون ہے۔ جبکہ سائل/اپیلانٹ کی استدعا ہے کہ منظوری اپیل ہذا کی پنشن کیس کی منظوری دی جائے۔ محکمانہ کارروائی letter No. 749 مورخہ 11/05/2015 بھی جاری شدہ ہے جس کی بابت کوئی ذکر چٹھی نمبری 9924 مورخہ 12/08/2015 میں نہیں کیا گیا ہے اور سائل کے ساتھ نا انصافی اور Service Rules کے منافی ہے۔ سائل کو Pension Ruels کے مطابق پنشن دی جائے اور آرڈر جاری کردہ تحت نمبر 9924-25 تاریخ 12/08/2015 منسوخ فرماتے ہوئے سائل کے ساتھ انصاف کیا جائے۔

سائل کا حیات دعا گو رہے گی۔

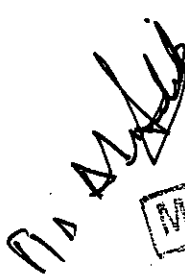

العارض

سیر و زما رتھا دختر ولیم عنایت گل سکھ مکان نمبر 990 محلہ نور الدین ایبٹ آباد

۱۹۰۸۰۲۰۱۵

کاپی برائے اطلاع و ضروری کارروائی۔

- 1- جناب چیف جسٹس آف پاکستان سپریم کورٹ اسلام آباد۔
- 2- جناب وزیر اعلیٰ صوبہ خیبر پختونخواہ پشاور
- 3- جناب چیف سیکریٹری صاحب صوبہ خیبر پختونخواہ پشاور
- 4- جناب سیکریٹری محکمہ تعلیم صوبہ خیبر پختونخواہ پشاور
- 5- جناب صوبائی محتسب اعلیٰ صوبہ خیبر پختونخواہ پشاور
- 6- جناب ڈپٹی کمشنر صاحب ضلع ایبٹ آباد



Muhammad Ali Asif
 Advocate

PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

NOTICE

No. PO/Complaint/550/08/2015/
Dated: Peshawar the, 02/09/2015

To

1. The Accountant General,
Khyber Pakhtunkhwa, Peshawar.
2. The District Accounts Officer,
Abbottabad.
3. The District Education Officer (Female),
Abbottabad.

Subject: REQUEST FOR PENSION BENEFITS

Enclosed find herewith copy of complaint emanated from Mst. Seroz Martha D/O Inayat Gul, R/O H.No. 990, Mohallah Noor ud Din, District Abbottabad, for your information and consideration.

In exercise of powers vested in him under section 10 (4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010, the worthy Provincial Ombudsman Khyber Pakhtunkhwa has directed me to request you to meet the allegations contained in the enclosed complaint. You may like to call / contact the complainant, hear him and redress his grievances if permissible under the relevant rules and submit a reply including rebuttal.

It will be appreciated if your reply is received in this Secretariat on or before 16/09/2015, please acknowledge.

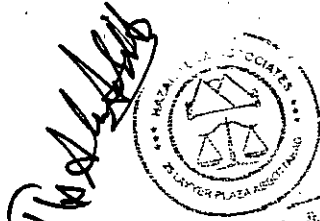
This issue with the approval of the Provincial Ombudsman.

(Abdul Sattar Khan, Advisor-I)
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa

Endst: of even No. & date:

✓ Copy of the above is forwarded to Mst. Seroz Martha D/O Inayat Gul, R/O H.No. 990, Mohallah Noor ud Din, District Abbottabad.

(Abdul Sattar Khan, Advisor-I)
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa




Muhammad Ali Asif
[Signature]

Overseas Pakistanis Foundation Building, Phase -V, Hayatabad, Peshawar.
Office Phone # 091-9219531-32, Office Fax # 091-9219526
Website: www.ombudsmankp.gov.pk
Email: provincialombudsman@gmail.com

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTABAD.No. 11087
Dated. 29-9-2015.Mr. Abdul Sattar (Advisor-I)
Provincial Ombudsman Secretariat.
Khyber Pakhtunkhwa, Peshawar.1398
07/10/2015Subject: - REQUEST FOR PENSION BENEFITS.(Mst. Seroz Martha PSHT)
MemoReference your letter No. PO/Complaint/550/8/2015 dated
02-09-2015.The Para wise reply of the complaint received regarding the pensionary benefit in r/o Mst. Seroz Martha(PSHT) vide your letter Cited above, is as under please.

1. That the applicant appointed as PTC in this Department in BPS.07 and later on upgrade/promoted as [PSHT (BPS-15) on 02-03-2013. She was posted at GGPS Maira Tell from GGCM Mir Pur. She took over charge at GGPS Maira Tell on 02-03-2013 and remained herself absent from duty station. She was served with explanation vide No. 1766 dated 31-12-2013, (Copy attached) on account of absence from duty. Then she was transferred to GGPS Jogen Mar (Sherwan). She also did not served at that school. She was again absent and issued explanation to her vide No. 755-56 dated 27-03-2014, No. 1245 dated 02-05-2014, and No. 2788 dated 12-12-2014. (Copy attached)
- 2- That applicant submitted application on 15-03-2015 for her retirement w.e.f. 01-03-2015. Before the submission of retirement by the applicant, Department issued show cause Notice through Daily "Mashraq" Peshawar dated 08-01-2015 (Copy attached) mentioning illegal of her absence from the school with direction to submit reply within 15-days. Neither applicant submitted the reply of show cause notice and explanations nor appeared before the competent authority. Regarding inactivation/stoppage of pay, source Form presented to the DAO Abbottabad but her pay not inactive as brother of teacher namely (Mr. VINOZE GILL who was the employee of DAO Abbottabad office) did not inactive pay in convince of the staff of DAO Abbottabad office (Copies of inactive source Form are Attached herewith).
3. That Para No.03 of the complaint is incorrect reply has already been given in Para 1 and 2 in details.
- 4- That Para No. 04 of the complaint is incorrect, the retirement case was delayed due to her long absence proceeding.
- 5- That the ParaNo. 05 is incorrect applicant was treated in accordance with law and rules.

The Advisor



Muhammad Ali Asif

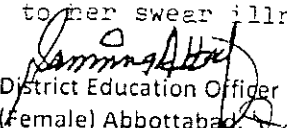
13/10/2015

R/n

47

what the applicant was treated in according with rules/law and in the light of judgment of honorable supreme Court of Pakistan; (No work no pay) copy attached.

- 8- That the Para No.08 of complaint is correct to extent of that the retirement order of the applicant issued vide No.9924-25 dated 12-08-2015.
- 9- That Para No 9 is incorrect recovery was made by the Department on account of her long absence from the school and irregular/illegal drawl of PA, Also stated that teacher has already admitted that she could not go to school in the farflung station due to her swear illness (copy attach


District Education Officer
(Female) Abbottabad.


Endst.No.

11988-89

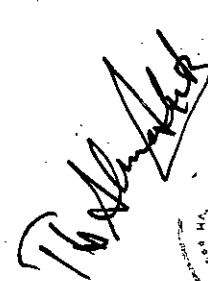
Dated: 29/9/2015

Copy is forwarded to:-

- 1- The Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2- The Deputy Commissioner Abbottabad w/r to his office dairy No. 14870 dated 17-08-2015.


District Education Officer
(Female) Abbottabad.




Muhammad Ali Asif
Assistant

48

PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA



Complaint No. 550/08/2015/4688

Dated: 08/10/2015

REJOINDER:

To,

Mst Seeroze Martha D/O Inayat Gul
H.No.990, Mohallah Noor-ud-Din,
District Abbottabad.

Subject: REQUEST FOR PENSION BENEFITS.

Reference your complaint No: 550/08/2015 dated: 03/08/2015 on the subject noted above.

The reply of the Agency (Office of the District Education Officer (Female) Abbottabad) No:11087 dated: 29/09/2015 received to this office is enclosed herewith for your perusal and rejoinder if so advised on or before 22/10/2015 positively, failing which it will be presumed that you have no objection on the report of the Agency.

THIS ISSUE WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN.

ABDUL SATTAR KHAN, Advisor-I
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

Muhammad Ali Asif
Advocate

49
The Provincial Ambuds Secretariat,
Peshawar Khyber Pakhtunkhwa

Subject: REJOINDER IN THE REPLY OF AGENCY (DEO (F)
ABBOTTABAD.

Respected Sir,


Rejoinder in the reply of appellant is as under:-

1. That, in Para No. 1 of reply show that there is contradiction of the department reply, in the reply department admit that appellant took charged at GGPS Mair tall dated 02/03/2013, and perform my duties regularly. According to the department, if I was absent why the department sent explanation after long time dated 31/12/2013 there is huge gaps between 02/03/2013 to 31/12/2013, period which show clear-cut discrimination of the department. According to service rules department, why not take action against me. Moreover stated that without any departmental inquiry. Appellant was again transferred at GGPS Joganmar without any reason. During this period departmental neither conduct inquiry nor any action was taken against appellant. According to the department reply. another show cause was issued against appellant dated 12/12/2014 is clear cut violation of rules, law, policy & Act of department is against the rules and policy. Department never serve explanations letter in the address of my house as well as my school. All these allegations are baseless and against the service rules and law. Appellant is entitled for pensions benefits.



Muhammad Ali Asif
Muhammad Ali Asif
Advocate

2. Reply of the department in para No. 2 is also contradictory as per rules and policy. Department has not complete the process in the light of service rules. Show cause notice published in daily "Mushriq" was illegal and against the rules and policy. In departmental reply department stated that inactivation form stoppage of pay was send DAO for stopped the salary of the appellant in the light of inactivation, salary of the appellant for the month November 2014 and February 2015 was stopped which is still pending. There is a law if the DAO is not give the response of the department, the next is that department approach to the higher authority. But in his reply show that department not approach to the higher authority, which show the personal grudge of the department against appellant, in the light of in activation form DAO has already been stopped the pay of the appellant in these months which date was mentioned in inactivation form. In his reply department nominate my brother (Mr. Vinoz Gill) who was the employee of DAO. He was auditor in DAO Office Abbottabad now he has retired and was not a competent authority. Nomination of my brother is illegal, he has right to take legal action against department in civil court, for his defamation because all these allegation are baseless and only to give mental torture to appellant and her family. Appellant was not treated accordance with law.

T/A Almas

UHAMMAD ALMASII
 Advocate

Reply of the Para No. 3 is incorrect. No legal process was adopted in my cause. Department treated appellant as 2nd

class citizen. In service rules there is proper provisions of rules regarding the employee, in service rules there is a proper proceeding for explanation show cause inquiry, but department not adopt the legal process. Process taken against appellant is illegal, against the law, rules and policy.

4. Reply of the department in para No. 4 is incorrect. During the service department was not take action against appellant as per rules and policy. After the retirement application procedure of the department is illegal, against the rules, law and policy. After the submission of retirement application. Department wrongly illegally take action act of the department is illegal, against the rules, law and policy. Department not complete the process within time. Act of the department is violations of rules, law and policy.
5. Reply of the department is incorrect. In retirement case no long proceeding is adopted, department treated appellant as minority. Department neither consider appellant as Pakistani citizen according to article 199 nor treated as per service rules.
6. Reply of the department in para-6 is illegal. During the service departmental not take action against appellant letter of the department No. 9924-25 dated 12/08/2005 is illegal and against the rules and policy.
7. Reply of the department in para-7 is incorrect. Appellant was not treated as per service rules, law and policy.

T. A. Asit



Muhammad Ali Asit
Advocate

52

8. Reply of the department in para-8, in which department admit that there is delay in retirement process after given the application of her long absence, which is contradictory.

9. Reply of para No. 9 is incorrect. Appellant was not treated as per rules. Recovery was made by department is illegal. Appellant submitted application for adjustment of absently period into leave with pay after the hardship taking in my retirement case. I was given application after a month of retirement application department verbally to submit application for adjustment of assent period, there is provision in service rules regarding absent period convert into leave. Appellant is entitles for leave with pay. Copy attached.

Dated: 19/10 /2015

— 50 —
Mst. Seroz Martha
D/o William Inayat Gill
R/o House No. 990/E,
Mohallah Noor ud Din,
Abbottabad

Copy is forwarded to:-

1. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. ✓ The Deputy Commissioner, Abbottabad.

Mst. Seroz Martha
D/o William Inayat Gill
R/o House No. 990/E,
Mohallah Noor ud Din,
Abbottabad

Mst. Seroz Martha



Muhammad Ali Asif
Advocate

53
PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

Complaint No.550/08/2015/S-12

Dated: 26/10/2015

HEARING:

To,

1. Accountant General
Government of Khyber Pakhtunkhwa
Peshawar.
2. The District Accounts Office
Abbottabad.
3. The District Education Officer (Female)
Abbottabad.
4. Mst Seeroze Martha D/O Inayat Gul
H.No.990, Mohallah Noor-ud-Din,
District Abbottabad.

Subject: RECTIFICATION OF SAS PART-I RESULT

Reference Complaint No:550/08/2015 dated: 03/08/2015 on the
subject noted above.

It is stated that hearing in to Case is essential due to divergent
pleadings.

You are, therefore, asked to put in appearance on 11-11-2015 at
11:00AM either in person or through duly authorized representative; as well as full
record pertaining to the complaint in support of your respective version.

The representative of the Agency should be an Officer well
conversant with the case (not below the rank of BPS-17) and should be authorized
to make a statement before the undersigned along with all the relevant record
regarding the subject matter.)

THIS ISSUE WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN.

Abdullah Khan
ABDUL SATTAR KHAN,
Advisor-I
Provincial Ombudsman
Khyber Pakhtunkhwa.

Overseas Pakistanis Foundation Building, Phase -V, Hayatabad, Peshawar.
Office Phone # 091-9219531-32, Office Fax # 091-9219526
Website: www.ombudsmankp.gov.pk
Email: provincialombudsman@gmail.com



To Abdullah
Muhammad Ali Asif
Advocate

54
PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

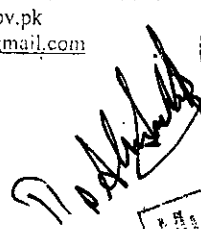
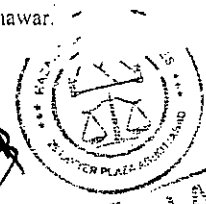
CLOSURE FINDINGS	
1	COMPLAINT NO: Complaint No.550/08/2015
2	NAME & ADDRESS OF THE COMPLAINANT: Ms. Seeroze Martha d/o Inayat Gill r/o House No: 990, Mohallah Noor-Ud-Din, District Abbottabad.
3	NAME OF THE AGENCY COMPLAINED AGAINST: 1. Accountant General Government of Khyber Pakhtunkhwa Peshawar. 2. District Accounts Office Abbottabad. 3. District Education Officer (Female) Abbottabad.
4	NAME OF THE INVESTIGATION OFFICER: Abdul Sattar Khan, Advisor- I
5	SUBJECT OF COMPLAINT: Request for pension benefit.
6	DATE OF REGISTRATION: 03/08/2015
7	DATE OF FINDINGS: 16/11/2015

THE COMPLAINT

Ms. Seeroze Martha d/o Inayat Gill, r/o H.No. 990, Mohallah Noor-Ud-Din, District Abbottabad has instituted the instant complaint alleging that she rendered spotless service as Primary School, Head Teacher (PSHT) in Education Department Abbottabad. When she submitted application for her retirement, she was intimated that she was absent for two years though she was paid promotion arrears to the tune of Rs. 12,440/- of BS-14 and 15. When complainant submitted leave applications towards fag end of her service, nothing was brought in her knowledge that something adverse was pending against her. She further stated that after issuance of retirement notification it was brought to her knowledge that she was absent and will be proceeded against departmentally. Her leave application was sanctioned on note sheet, but it was not acted upon, rather it is missing from the record. Lastly, complainant submitted an appeal that her absence period be treated as leave with pay which is still pending.

She has approached this forum seeking pension and setting aside of order dated 12-08-2015 vide which recovery is to be made from her pension/gratuity regarding absence period for which pay was drawn illegally.

Overseas Pakistanis Foundation Building, Phase -V, Hayatabad, Peshawar.
Office Phone # 091-9219531-32, Office Fax # 091-9219526
Website: www.ombudsmankp.gov.pk
Email: provincialombudsman@gmail.com



Muhammad Ali Asif
Advocate

55
PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

REPLY OF THE AGENCY

Notices as required under Section 10(4) of Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010 were issued to Accountant General Government of Khyber Pakhtunkhwa Peshawar, District Accounts Office Abbottabad, and District Education Officer (Female) Abbottabad to meet the allegation contained in the complaint including rebuttal, if any. In response District Accounts Officer Abbottabad, and District Education Officer (Female) Abbottabad submitted their written replies. District Accounts Officer Abbottabad in his written reply averred that pension case of complainant has not been received from concerned quarters so far. District Education Officer (Female) Abbonabad in her written reply stated that complainant was initially serving as PTC teacher. On promotion as PSHT BS-15 on 02-03-2015, she was posted at Government Girls Primary School Maira Tell, where she took charge but thereafter, remained absent from duty. Her explanation was called, and she was transferred to Government Girls Primary School Jogan Mar (Sherwan), she did not report there also. Her explanation was called again; in response she submitted an application on 15-03-2015 for her retirement w.e.f 01-03-2015. But before that, the Agency had issued publication against her for her willful absence from duty in "Daily Mashriq Peshawar". The complainant neither filed reply to the show cause notice nor appeared before Competent Authority to explain her absence. Lastly, the complainant has herself admitted that she cannot serve in far flung areas due to illness, therefore, recovery is to be made from her pension/ gratuity regarding her long absence from duty and illegal drawl of pay.

REJOINDER

The written comments of the Agency were communicated to complainant for filing rejoinder: She in her rejoinder reiterated her earlier stance without any addition.

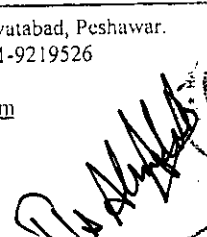

HEARING

Brother of complainant and representatives of the Agency present and heard at length. Both the parties explained their stance.

FINDINGS

Record shows that complainant remained absent from duty for the period 03-03-2013 to 31-01-2015. The Agency while issuing her retirement notification on 12-08-2015 also directed that recovery from her pension/ Gratuity be made regarding her absence period for which she has drawn pay illegally. No case of mal-administration has been made out.

Overseas Pakistanis Foundation Building, Phase -V, Hayatabad, Peshawar.
Office Phone # 091-9219531-32, Office Fax # 091-9219526
Website: www.ombudsmankp.gov.pk
Email: provincialombudsman@gmail.com



Muhammad Ali Asif
Advocate

56
PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

Accordingly investigation is closed under Regulation 17(b) of Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011.

The Secretary and Director Education & Schools Education are advised to enquire as to how the complainant managed to draw pay during her absence from GGPS Maira Tell and without reporting for duty in GGPS Jogen Mar. The enquiry be completed in 60 days and findings shared with this Secretariat. Instructions for school management may also be issued to avoid repetition of similar lapses in future.

Waqar Ayub

WAQAR AYUB
Provincial Ombudsman

Muhammad Ali Asif



Muhammad Ali Asif
Advocate

57

PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

Complaint No. 550/08/2015 / 16715

Dated: 26/11/2015

1. Accountant General
Government of Khyber Pakhtunkhwa
Peshawar.
2. District Accounts Office
Abbottabad.
3. District Education Officer (Female).
Abbottabad.
4. Ms. Seeroze Martha d/o Inayat Gill
r/o House No: 990, Mohallah Noor-Ud-Din,
District Abbottabad.

Subject: REQUEST FOR PENSION BENEFIT.

Finding of Provincial Ombudsman on the complaint No. 550/08/2015 filed by complainant Ms. Seeroze Martha is enclosed herewith for perusal.

The aggrieved person can file representation to Governor, Khyber Pakhtunkhwa within thirty days of the order under Section 31 of the Khyber Pakhtunkhwa, Provincial Ombudsman Act, 2010 No: (XIV, 2010s).

THIS ISSUES WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN


Abdul Sattar Khan
ABDUL SATTAR KHAN, Advisor-I
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

ENDST: OF EVEN NO & DATE:

Copy forwarded to i/c Computer Section, Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa alongwith finding in duplicate for updating record under Regulation 19 of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaint) Regulation, 2011.

Abdul Sattar Khan
ABDUL SATTAR KHAN, Advisor-I
Provincial Ombudsman Secretariat,

Overseas Pakistanis Foundation Building, Phase -V, Hayatabad, Peshawar.
Office Phone # 091-9219531-32, Office Fax # 091-9219526
Website: www.ombudsmankp.gov.pk
Email: provincialombudsman@gmail.com

To Asif

Muhammad Ali Asif
In-charge

ANNEXURE H

خدمت جناب ڈائریکٹر صاحب نظامت تعلیمات صوبہ خیبر پختونخواہ پشاور

The conditions and restrictions...
be found in the current edition...
side are binding upon every...
Magician Post Office Act, 1898.

The Post Office Act, 1898...
Magician Post Office Act, 1898.

عنوان: درخواست براد ختم کئے جانے (Wave off) کئے جانے 3 Para No. آف لیٹر نمبر

12/08/2015 مورخہ 9924-25/EB-1/R/Casevol-01



=====

جناب عالی! درخواست ذیل عرض ہے۔

- 1- یہ کہ سائلہ محکمہ تعلیم ضلع ایبٹ آباد زنانہ سے ریٹائر ہو چکی ہے۔
- 2- یہ کہ محکمہ تعلیم ضلع ایبٹ آباد زنانہ نے اپنے جاری کردہ چھٹی نمبر 9924-25/EB-1/R/Casevol-01 میں سائلہ کے خلاف Malafidly۔ پیرہ گراف نمبر 3 کا اضافہ کرتے ہوئے سائلہ کا معاشی قتل کیا ہے۔ جو کہ سائلہ تمام حقوق ریٹائرمنٹ کی حقدار تھی سے محروم کر دیا گیا۔
- 3- یہ کہ سائلہ نے پہلے بھی Appeal دائر کر رکھی ہے۔
- 4- یہ کہ منظور دی درخواست چھٹی/ لیٹر نمبر 9924-25/EB-1/R/Casevol-01 مورخہ 12/08/2015 کی شن نمبر 3 کو ختم کئے جانے کا حکم صادر فرمایا جائے اور حقوق سائلہ دیے جائیں۔ سائلہ تمام عمر دعا گور ہے گی۔

المرقوم: 2015/ 5/10

مارتھاسیروز گل دختر ولیم عنایت گاسکنہ مکان نمبر 990/E محلہ نور الدین ایبٹ آباد۔۔۔۔۔ (سائلہ)



MURTAZA ALI ASIF
10/10/2015

DBA No. _____
 BC No. _____
 Name of Advocate _____

S.No _____



Head Clerk
District Bar Association
Abbottabad

وکالت نامہ

عدالت ضاب سروس ٹریبونل شمارہ _____
 عنوان: سروس مارٹھا بنام حکومت گلگت بلتستان
 منجانب: ایڈووکیٹ نوعیت مقدمہ ایڈ
 باعث تحریر آئیکہ 3/2/2016

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام _____ کے لیے
سجاد کدراہ و وکیل، علی آصف اور وکیل
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے
 جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ
 سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے
 علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ
 ساعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے
 کسی معاوضہ کے ادا کرنے یا عینانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف
 مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم
 درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کار و پیہ وصول کرنے اور رسید دینے اور داخل کرنے
 اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات
 از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب
 موصوف کو بشرط ادا جی علیحدہ عینانہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے
 کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں
 وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف
 کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ
 کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔
 مورخہ: 3/2/2016
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور مطہور ہے۔ دن 3 ماہ سال

Accepted & Attended
 [Signature]



Muhammad Ali Asif
 Advocate

سروس مارٹھا رفرنس نمبر 3/2/2016

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

Appeal No. 127/16

MST SEEROZE MARTHA Appellant

VS

**GOVERNMENT OF K. P. K THROUGH SECRETARY (E & SE)
DEPTT: PESHAWAR & OTHERS..... Respondents**

Para wise comments on behalf of Respondents No 1, 3 to 4 & 6.

INDEX

S. No.	Description	Annexure	Page No
1.	Para Wise Comments/reply & Affidavit		1-4
2.	Annexure	"A"	5-8
3.	Annexure	"B"	9-13
4.	Annexure	"C"	15
5.	Annexure	"D"	16-21


Through Representative

....Respondents

Dated: 28-04-2016

S P 1

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

Appeal No. 127/2016

MST SEEROZE MARTHA Appellant

VS

**GOVERNMENT OF K. P. K THROUGH SECRETARY (E & SE)
DEPTT: PESHAWAR & OTHERS..... .. Respondents**

Para wise comments on behalf of Respondents No 1, 3to 4 & 6.

Respectfully Sheweth:

Para wise comments on behalf of the respondents No 1, 3 to 4 & 6 as under;

PRELIMINARY OBJECTIONS:

1. That the appellant has no locus standi/cause of action to file the instant appeal.
2. That the appellant is estopped to agitate the instant matter before this Honorable Tribunal.
3. That the appellant has not approached this Honourable Tribunal with clean hands.
4. That the appellant has filed instant appeal with malafide intention for wrongful gain and suppressing the original facts, hence, the appeal is liable to be dismissed.
5. That the appellant was treated as per rules law and policy. Therefore appellant is not entitled for any relief and appeal is liable to be dismissed without any further proceeding.
6. That the appeal of the appellant is time barred. Hence liable to be dismissed.
7. That the instant appeal is not maintainable in its present form.
8. That appellant was found irregular in her respective duties.
9. That the appellant is estopped to sue due to his own conduct.
10. That the instant appeal is not competent as there is no final order.
11. That the instant appeal is against the law/service rules hence not maintainable.
12. That the appellant has filed the present appeal just to pressurize the respondents.
13. That the appellant has suppressed the original facts from this Honorable Tribunal. has not entitled for any relief and appeal is liable to be dismissed.

FACTURAL OBJECTIONS:

1. Para No.1 is correct extent to that the appellant appointed as PTC in this Department in BPS-7 and letter on upgrade/promoted as PSHT BPS-15 on 02-03-2013. She was posted at GGPS Maira Tell from GGCM Mirpur Abbottabad. She took over charge at GGPS Maira Tell on 02-03-2013, after the charge remain herself absent from duties at station. She was served with explanation vide No 1766 dated 31-12-2013, (Copy attached) on account of absence from duties then she was transferred to GGPS Jogen Mar (Sherwan). She did not serve at the school. She was again absent and issue explanation to her vide No 755-56 dated 27-03-2014, and No 1245 dated 02-05-2014, and No 2788 dated 12-12-2014, while the other para is incorrect. Copies of the explanations are annexed as **Annexure "A"**
2. Para No.2 is correct. After the promotion appellant remains absent willfully detail reply has already been given in Para No 1. Regarding inactivation/stoppage of pay source from presented to the DAO Abbottabad but her pay not inactive as brother of teacher namely **Mr. VINOZE GILL**, (who was the employee of the DAO Abbottabad office) did not inactive pay in convince of the staff of DAO Abbottabad office. Copies of inactivation source form are annexed as **Annexure "B"**.
3. Para No 3 is correct. That appellant submitted application on 15-03-2015 for her retirement w.e.f 01-03-2015. Before the submission of retirement by the appellant, department issued show cause Notice through **Daily "MUSHRAQ" Peshawar dated 08-01-2015**, mentioning illegal of her absence from the school with direction to submit reply within 15 days. Neither applicant submitted the reply nor show cause Notice and explanations nor appeared before the competent authority. Regarding inactivation/stoppage of pay source from presented to the DAO Abbottabad but her pay not inactive as brother of teacher namely **Mr. VINOZE GILL**, (who was the employee of the DAO Abbottabad office) did not inactive pay in convince of the staff of DAO Abbottabad office.
4. Para No 4 is incorrect all the procedure was adopted in accordance with rules and law.

5. Para No 5 is correct to extent that latter recovery made from the pension/gratuity amounting Rs 868428/= of her absent period, which is in accordance with rules remaining Para is incorrect.
6. Para No 6 is correct to extent that office of the Director Elementary & Secondary Education asked for comments regarding appellant appeal, the Respondent No 4 submitted comments/reply in detail. Copy of letter No 3231 and reply of the respondent No 4 are annexed as Annexure "C".
7. Para No7 is correct to the extent that appellant filed appeal to different department. Office of the Directorate and Provincial Ombudsman Secretariat Peshawar asked for reply in the appeal of the appellant. Respondent No 4 and 6 appear before the Court of Provincial Ombudsman Peshawar, and submitted detail reply of the appeal of the appellant. Letter of the Provincial Ombudsman and reply of the agency are annexed as Annexure "D".
8. Para No 8 id relates to record.

GROUNDS

- a. Para of the ground "a" is correct to extent that appellant belongs to minorities, while the other portion is incorrect.
- b. Para of the ground "b" is incorrect.
 - i. Para of the ground "i" is incorrect. Reply has already been given in above factual objection in detail.
 - ii. Para of the b ground is "ii" is incorrect. Appellant is treated in accordance with law and rules.
 - iii. Complete reply has been given in Para No 2 of the factual objection of the appeal.
- c. Para of the ground "c" is incorrect. Reply submitted in Para 2 & 3 of the factual objections in detail.
- d. Para of the ground "d" is incorrect.

- e. In Reply of the ground "e", it is humbly submitted that the respondent No 4 has submitted detail report to the Provincial Ombudsman Peshawar on response of his letter No. PO/Complaint/550/8/2015 dated 02-09-2015.
- f. Para No of the ground "f" is incorrect.
- g. Para of the ground "g" is incorrect. Reply has already been given in above Paras. Case was properly preceded in accordance with rules and law.

It is therefore humbly prayed that in the light of foregoing comments, the appeal may graciously be dismissed with cost throughout.

Sub-Divisional Education Office
Female, Abbottabad

(Respondent No. 6)

Director (E & SE)
Khyber Pakhtunkhawa
Peshawar.

(Respondent No. 3)

District Education Office
Female, Abbottabad

(Respondent No. 4)

Secretary Education (E & SE)
Khyber Pakhtunkhawa
Peshawar.

(Respondent No. 1)

Through Representative

AFFIDAVIT:

Stated on oath that the contents of instant Para wise comments are true and correct to the best of my Knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Saminah Taj
/Respondent No 4

15/2/40

15/2/40

Annexure "A"

5

OFFICE OF THE SUB DIVISIONAL OFFICER (FEMALE) ABBOTTABAD.

No. 2788

Dated Abbottabad, the 17/12/2014

Mst. Saadessa Marth PSMT
0078, Jagan Mar (Circle Sherwan)

Subject:- ABSENCE FROM THE SCHOOL/EXPLANATION.

Memo:

As reported by Mst. Surrayya Bibi PSMT, 0078, Jagan Mar reported by ADO Circle Sherwan dt: 17-12-2014, you are absent from the school and the instructional work of the school as well as poor little girls has been suffered badly.

Can you explain the solid reason for the said negligence your reply along with solid reason based on facts should reached to the undersigned with in seven days failing which you will be held responsible consequences.

for the

Sd
Sub Divl: Education Officer(F)
A b b o t t a b a d .

Encl No. 2789-90
Copy to:-

- 1. The LAO(F)Abbottabad
- 2. ADO Circle- Sherwan.

Handwritten signature
Sub Divl: Education Officer(F)
A b b o t t a b a d .

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A. 2000

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OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) A.ABAD.

No. 1776 /Expl:
Dated 31/12/2013


To: Mst. Sehroz Martha PSHT
GGPS Maira Tall.

Subject: EXPLANATION.

Memo:

You were found absent from duty w.e.from 02/03/13 to Up Till Now according to the report of ADO concerned.


Absence from duty is gross misconduct and liable to be proceeded under the E & D rules, 2011. You are hereby called upon to explain the reason of your willful absence from duty within three days of the issuance of this letter failing which it will be presumed that you have nothing to offer in your defence and strict disciplinary action will be initiated against you under the rules.


SUB DIVISIONAL EDUCATION
OFFICER (F) ABBOTTABAD

Endst: of even Number & Date:

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

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Female) Abbottabad.


SUB DIVISIONAL EDUCATION
OFFICER (F) ABBOTTABAD

(E) D.Y. Edu. A.D

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OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) A.ABAD.

No. 755-86 Expl:

Dated 27/3/14 /2014

To


Mst: Schrooz Martha
Gh. Ps. Maira, Tall

Subject: EXPLANATION.

Memo:

You were found absent from duty w.e. from 2/3/13 to up till now according to the report of ADO concerned.


Absence from duty is gross misconduct and liable to be proceeded under the E & D rules, 2011. You are hereby called upon to explain the reason of your willful absence from duty within three days of the issuance of this letter failing which it will be presumed that you have nothing to offer in your defence and strict disciplinary action will be initiated against you under the rules.


SUB DIVISIONAL EDUCATION
OFFICER (F) ABBOTTABAD

Endst: of even Number & Date:

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

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Female) Abbottabad.


SUB DIVISIONAL EDUCATION
OFFICER (F) ABBOTTABAD

By: Distt. Officer
(F) Pry: Edu: Atd

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Sub-Divisional Education Officer (Female) Abbottabad

No. 1245

Dated Abbottabad, the 20/5/2014.

Mat: Searone Martha PMPT
GGPS, Jogan Mar (Sherwan Circle).

Subject: - EXPLANATION

Re: -

As reported by the AEO Circle Sherwan that you have failed to assume your new assignment at GGPS, Jogan Mar. Whereas you have ought to have been taken over the charge on 1-3-2014. Can you explain that under which circumstance you not do so.

Your reply along with the solid/cogent reason of this negligency should be reached to the undersigned with in seven days. In failure you will be held for the consequences.

[Signature]
Sub-Divisional Education Officer (F)
Abbottabad.

Encl. No. 1246
Copy to: -

1. The DSO (Female) Abbottabad.

Dist. Educ. Officer
No. 1246
Date 21.5.14
Abbottabad

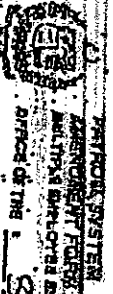
[Handwritten signatures and initials]
A. I. E. O. (F)
P. M. O. S. R. J. G. M.
D. E. O. (F)
23/5/14

[Signature]
Sub-Divisional Education Officer (F)
Abbottabad.

8

Annexure B

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OFFICE OF THE **SUB-DIVISIONAL ENGINEER** (S.D.E.)
 ROAD WORKS DEPARTMENT, BANGALORE
 18/12/2013
 S.D.E. (R) Bangalore

Employee Number	EMPLOYEE'S NAME	Designation	Grade	Age	RELIGION	DATE OF BIRTH	DATE OF JOINING	DATE OF RESIGNATION	REMARKS
00005212	Sapna B.D.	BT	Gr. 11	35	Hindu	12/11/78	12/11/78	12/11/78	Retired
00704104	Tanveer Ahmad Khan	Asst. Engineer	Gr. 12	35	Muslim	12/11/78	12/11/78	12/11/78	Retired
00005623	Sajida Bano	Asst. Engineer	Gr. 12	35	Muslim	12/11/78	12/11/78	12/11/78	Retired
00005646	Senior Meena	Asst. Engineer	Gr. 12	35	Hindu	12/11/78	12/11/78	12/11/78	Retired
00381323	Rukhsanda N. Ling	Asst. Engineer	Gr. 12	35	Hindu	12/11/78	12/11/78	12/11/78	Retired
00206156	Sakiba Biko	Asst. Engineer	Gr. 12	35	Muslim	12/11/78	12/11/78	12/11/78	Retired

Prepared by: *[Signature]*
 Date: 18/12/13
 Checked by: *[Signature]*
 Date: 18/12/13

Printed at Bangalore

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Answers to
19

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SYSTEM
MENT FORM
EMPLOYEE ENTRY
OF THE
MONTH OF

SAB Divisional Laboratory
Officer (F) Anantnagar

1/2014

FORM PC 201
Doc
Page No.

AD7043 Description SDEO (F) P. A. Head

EMPLOYEE DETAILS			GENERAL DATA CHANGE			CHANGES PAYMENTS / DEDUCTIONS					Effective Date	Remarks	
Employee Number	Employee Name	NIS Number	Unit Type	Field No	New Contents	Wage Type	Amount			Stop Sal.			
							Rupees	Paise	Adi				
00005135	Samina Pst. K.G.P.S		Sulwala			117	9	ma	ct	i	ve	1/2/14	Absent
00006178	Samina Nazki Pst "		Hadora Road			117	9	ma	ct	i	ve	1/2/14	-N-
000581471	Rukhsana " "		Naja Bardi			117	9	ma	ct	i	ve	1/2/14	-N-
00196132	Shahnaz Bibi Pst "		Sultan Pur			117	9	ma	ct	i	ve	1/2/14	-N-
00421277	M. Shabbir Chow "		Nalwa Bai			117	9	ma	ct	i	ve	1/2/14	Died
00521569	Rustam Khan " "		Jandaka			117	9	ma	ct	i	ve	1/2/14	Retired
00692736	Saira Rehman Pst "		U. Birangali			117	9	ma	ct	i	ve	8/2/14	Died
0005367	Safina Bibi Pst "		Dherian			117	9	ma	ct	i	ve	1/2/14	Retired
00095313	Balgees Akht. " "		Bandi Barson			117	9	ma	ct	i	ve	1/2/14	Retired
00441628	M. Riaz Chow "		Dabban			117	9	ma	ct	i	ve	4/2/14	died
00006242	Kausar Tabasum "		Moosarang			117	9	ma	ct	i	ve	1/2/14	Absent
00005646	Seroz Nurhuda "		-			117	9	ma	ct	i	ve	1/2/14	Absent
00005159	Mehz Afzoon " "		Mandhach J			117	9	ma	ct	i	ve	1/2/14	Absent
00005638	Khawar Muhammad Chow					117	9	ma	ct	i	ve	1/2/14	RTD

Signature
Officer (F) Anantnagar

Audited/checked By

Entered/verified By

AMOUNTS PAID
RECEIPTS SHEET (FORM 1042-S)

Office of the SECRETARY

For the month of July 2014

000 Date AD7093 Page 12014 200
Post Serial

50800 AC Head
508208

Employee Number	EMPLOYEE NAME	Job Title	Job Code	GENERAL DATA CHANGE		CLASSIFICATION	Grade	Rate	Pay Period	Pay Basis	Remarks
				New	Comments						
002581471	Rudhsonia Bibi BT					117	9mactive		1/3		Absent
000650111	Abdusamad chd					117	9mactive		3/2		Absent
000566610	Najia Bibi BT					117	9mactive		1/3		Long Leave
000050035	Zahada Bibi BT					117	9mactive		1/3		Long Leave
000026153	Shauha Bibi BT					117	9mactive		1/3		Long Leave
00194461	Safida Bibi BT					117	9mactive		1/3		Long Leave
00257434	Sabia Bibi BT					117	9mactive		1/3		Long Leave
00005646	Sandya Madhu BT					117	9mactive		1/3		Long Leave

Sub Divisional Education
Office, Abbottabad

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FORM 1042-S
Page 1

AIRTEL SYSTEM
AGREEMENT FORM
 AND THE PART OF THE WORK

DATE OF THE :
 1971 THE MONTH OF :
 0000000000
 2043

5270 (B)
 4/11/71
 ALL

12

FORM 1001
 Date:
 Page:

Employee No.	EMPLOYEE DATA	Job No.	Job Title	Job Description	GENERAL DATA CHANGE		CHANGE IN PAY RATE / BENEFITS		Remarks
					Rate	Benefit	Rate	Benefit	
00006183	Stanska, Karen	BT	Region Mgr	✓	✓	117	1	MACTIVE	1/4 Long Absent
00005830	Stanska, Karen		Region Mgr	✓	✓	117	1	MACTIVE	11
00005545	Stanska, Karen		Region Mgr	✓	✓	117	1	MACTIVE	11
00005646	Stanska, Karen		Region Mgr	✓	✓	117	1	MACTIVE	11

[Handwritten signature]

11/4

19

FOR THE MONTH OF: AD 7043
 YEAR CODED: AD 7043 Position: AD 7043

4930

Employee Number	Employee Name	Job Title	Grade	Start Date	End Date	Remarks
00005792	Khalida B. Sid	PS1	119			Present
00005309	Danish B. Sid		119			Present
00005611	Nasreen Akter		119			Absent
00005013	Shabana Akter		119			Absent
00005016	Khula Hanid		119			Absent
00004980	Yasmin Akter		119			Absent
00002615	Shahina Akter		119			Absent
00005646	Soni Nazim		119			Absent
000057063	Akmal Shakir		119			Absent
	From 7043 to 7072					Transfer

Prepared by: [Signature]
 Checked by: [Signature]

Reviewed / Verified By: [Signature]

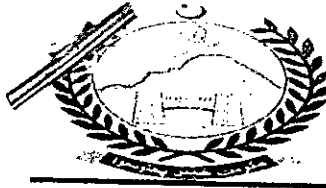
4690-0
 3127-0
 4690-0

AD 7043
 AD 7043
 AD 7043

Annexure "C"

15

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 836 /

Dated: 15/4/2016

The Deputy Director (Esttab:) (Female)
Directorate of El & Secondary Education KPK Peshawar.

Subject: - **REQUEST FOR PENSION BENEFIT.**
Memo;

Reference your No.3231/file Ombus:/complaint cell/2016 dated 17-03-2016

I have the honors to bring in to your kind notice that one Mst:Seeroz Martha has been promoted as PSHT (BPS-15) and posted at GGPS.Maira Tall (Abbottabad circle) But she has not been remained regular in attendance. So she was called to explain for her irregularity in the Performance of her duty at GGPS.Maira Tall But neither she attended the school nor given any reply of the explanation.

For her this disobedience attitude, She has been transferred to GGPS.Jogen Mair (Sherwan Circle) but History repeats itself and she has not changed her this behavior and still absent continuously from her newly transferred school .So She was also called Explanation but no return from her end. At last her absence has been published in Daily Musharq Peshawar. Dated.08.01.2015.After having known said publication from the News paper, She has applied for Retirement.

As for as question of the drawl of her salary is concerned; this office has tried our best to get her pay inactive sending the source form but her rear brother Mr.Venzoze Gill. Who was working in the DAO Office Abbottabad, has tried his best for activation of her salary.

Furthermore the said dispute has already been enquired conducting the enquiry by the Headmistress GGHS.Bandi Phulan, Copy of the same is enclosed here with for your kind perusal and further necessary action please.

Encl:

01. Copy of Letter No.11087 Dated.29-09-2015
02. Copy of Application of teacher showing the reason that she could not went to school due to her swear illness
03. Copy of show cause notice published in Daily Mashraq Peshawar Dated.08-01-2015
03. Copy of Explanations issued to teacher vied this office No.2788 dated.12.12.2014, No.755-56 dated.27-03-2014, No.1776 dated.31-12-2013 and No.1245 dated.20.05.2014.
04. Copies of Source-3 for pay inactive sent to DAO Abbottabad office during 12/2013, 01/2014, 03/2014, 04/2014, and 11/2014.
05. Copies of enquiry report of Headmistress GGHS.Bandi Phulan

sd
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Endst No. 837 Dated. 15/4 /2016

Copy along with the said enclosure is forwarded to Mr.Nasrullah Khan Section officer (Complaint)Govt: of KPK El:& Secondary Education Deptt:Black"A"Civil Secretariat Peshawar W/r No. So (comp) E&SED/KPK/1-26-2016/3898 dated.21.03.2016receied on 30-03-2016 for information please.

sd
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

PROVINCIAL OMBUDSMAN (صوبائی محکمہ) SECRETARIAT,
KHYBER PAKHTUNKHWA

Dated: 09/03/2015

Complaint No. 550/08/2015/2816

To

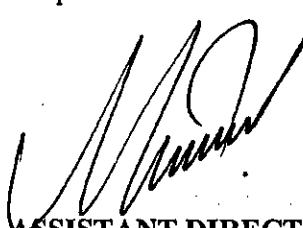
1. Secretary Government of Khyber Pakhtunkhwa
Elementary & Secondary Education Department
Peshawar.
2. Director
Elementary & Secondary Education
Department, Peshawar.

Subject: **REQUEST FOR PENSION BENEFIT.**

Enclosed please find copy of findings i/r of complaint No. 550/08/2015 filed by Mst. Seroz Martha (complainant) for your information and further necessary action.

It will be appreciated if the requisite report is submitted within the stipulated period.

Encl: As Above


ASSISTANT DIRECTOR
(Implementation),
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

Endst: of even No. & date:

Copy forwarded for information to:-

1. P.S to Provincial Ombudsman Khyber Pakhtunkhwa.


ASK

13/3/2016

3898

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So(Comp)


ASSISTANT DIRECTOR
(Implementation),
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

Diary No. 632
Dated: 15/3/16
A.S. Services (Info) E.S.

(17)

• D •

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTABAD.

No. 11087
Dated: 29-9-2015

Mr. Abdul Sattar (Advisor-I)
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa, Peshawar.

Subject; - **REEQUEST FOR PENSION BENEFITS.(Mst. Seroz Martha PSHT)**
Memo

Reference your letter No. PO/Complaint/550/8/2015 dated 02-09-2015.


The Para wise reply of the complaint received regarding the pensionery benefit in r/o **Mst. Seroz Martha(PSHT)** vide your letter Cited above, is as under please.

1. That the applicant appointed as PTC in this Department in BPS.07 and later on upgrade/promoted as [PSHT (BPS-15) on 02-03-2013. She was posted at GGPS Maira Tell from GGCM Mir Pur. She took over charge at GGPS Maira Tell on 02-03-2013 and remained herself absent from duty station. She was served with explanation vide No. 1766 dated 31-12-2013,(Copy attached) on account of absence from duty. Then she was transferred to GGPS Jogen Mar (Sherwan).She also did not served at that school. She was again absent and issued explanation to her vide No. 755-56 dated 27-03-2014, No. 1245 dated 02-05-2014, and No. 2788 dated 12-12-2014. (Copy attached)
- 2- That applicant submitted application on 15-03-2015 for her retirement w.e.f 01-03-2015.Before the submission of retirement by the applicant, Department issued show cause Notice through Daily "Mashraq" Peshawar dated 08-01-2015(Copy attached) mentioning illegal of her absence from the school with direction to submit reply within 15-days .Neither applicant submitted the reply of show cause notice and explanations nor appeared before the competent authority. Regarding inactivation/stoppage of pay , source Form presented to the DAO Abbottabad but her pay not inactive as brother of teacher namely (Mr. VINOZE GILL who was the employee of DAO Abbottabad office) did not inactive pay in convince of the staff of DAO Abbottabad office (Copies of inactive source Form are Attached herewith).
3. That Para No.03 of the complaint is incorrect reply has already been given in Para 1 and 2 in details.
- 4- That Para No. 04 of the complaint is incorrect, the retirement case was delayed due to her long absence proceeding.
- 5- That the ParaNo. 05 is incorrect applicant was treated in accordance with law and rules.
- 6- That Para No 6 is incorrect detail given in Para No. 01 & 02 in detail

VAD

18

- 7- That the applicant was treated in according with rules/law and in the light of judgment of honorable supreme Court of Pakistan;-(No work no pay) copy attached.
- 8- That the Para No:08 of complaint is correct to extent of that the retirement order of the applicant issued vide No.9924-25 dated 12-08-2015.
- 9- That Para No 9 is incorrect recovery was made by the Department on account of her long absence from the school and irregular/illegal drawl of pay. Also stated that teacher has already admitted that she could not go to school in the farflung station due to her swear illness (copy attached)


District Education Officer
(Female) Abbottabad.

Endst.No. 11080-34 Dated: 29-7-15

Copy is forwarded to:-

- 1- The Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2- The Deputy Commissioner Abbottabad w/r to his office dairy No. 14870 dated 17-08-2015.


District Education Officer
(Female) Abbottabad

19

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CLOSURE FINDINGS	
1. COMPLAINT NO:	Complaint No.550/08/2015
2. NAME & ADDRESS OF THE COMPLAINANT:	Ms. Seeroze Martha d/o Inayat Gill r/o House No: 990, Mohallah Noor-Ud-Din, District Abbottabad.
3. NAME OF THE AGENCY COMPLAINED AGAINST:	1. Accountant General Government of Khyber Pakhtunkhwa Peshawar. 2. District Accounts Office Abbottabad. 3. District Education Officer (Female) Abbottabad.
4. NAME OF THE INVESTIGATION OFFICER:	Abdul Sattar Khan, Advisor- I
5. SUBJECT OF COMPLAINT:	Request for pension benefit.
6. DATE OF REGISTRATION:	03/08/2015
7. DATE OF FINDINGS:	16/11/2015

THE COMPLAINT

Ms. Seeroze Martha d/o Inayat Gill, r/o H.No. 990, Mohallah Noor-Ud-Din, District Abbottabad has instituted the instant complaint alleging that she rendered spotless service as Primary School Head Teacher (PSHT) in Education Department Abbottabad. When she submitted application for her retirement, she was intimated that she was absent for two years though she was paid promotion arrears to the tune of Rs. 12,440/- of BS-14 and 15. When complainant submitted leave applications towards fag end of her service, nothing was brought in her knowledge that something adverse was pending against her. She further stated that after issuance of retirement notification it was brought to her knowledge that she was absent and will be proceeded against departmentally. Her leave application was sanctioned on note sheet, but it was not acted upon, rather it is missing from the record. Lastly, complainant submitted an appeal that her absence period be treated as leave with pay which is still pending.

She has approached this forum seeking pension and setting aside of order dated 12-08-2015 vide which recovery is to be made from her pension/gratuity regarding absence period for which pay was drawn illegally.

REPLY OF THE AGENCY

41

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Notices as required under Section 10(4) of Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010 were issued to Accountant General Government of Khyber Pakhtunkhwa Peshawar, District Accounts Office Abbottabad, and District Education Officer (Female) Abbottabad to meet the allegation contained in the complaint including rebuttal, if any. In response District Accounts Officer Abbottabad, and District Education Officer (Female) Abbottabad submitted their written replies. District Accounts Officer Abbottabad in his written reply averred that pension case of complainant has not been received from concerned quarters so far. District Education Officer (Female) Abbottabad in her written reply stated that complainant was initially serving as PTC teacher. On promotion as PSHT BS-15 on 02-03-2015, she was posted at Government Girls Primary School Maira Tell, where she took charge but thereafter, remained absent from duty. Her explanation was called, and she was transferred to Government Girls Primary School Jogan Mar (Sherwan), she did not report there also. Her explanation was called again; in response she submitted an application on 15-03-2015 for her retirement w.e.f 01-03-2015. But before that, the Agency had issued publication against her for her willful absence from duty in "Daily Mashriq Peshawar". The complainant neither filed reply to the show cause notice nor appeared before Competent Authority to explain her absence. Lastly, the complainant has herself admitted that she cannot serve in far flung areas due to illness, therefore, recovery is to be made from her pension/ gratuity regarding her long absence from duty and illegal drawl of pay.

REJOINDER

The written comments of the Agency were communicated to complainant for filing rejoinder. She in her rejoinder reiterated her earlier stance without any addition.

HEARING

Brother of complainant and representatives of the Agency present and heard at length. Both the parties explained their stance.

FINDINGS

Record shows that complainant remained absent from duty for the period 03-03-2013 to 31-01-2015. The Agency while issuing her retirement notification on 12-08-2015 also directed that recovery from her pension/ Gratuity be made regarding her absence period for which she has drawn pay illegally. No case of mal-administration has been made out.

PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

21

42

Accordingly investigation is closed under Regulation 17(b) of Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011.

The Secretary and Director Education & Schools Education are advised to enquire as to how the complainant managed to draw pay during her absence from GGPS Maira Tell and without reporting for duty in GGPS Jogen Mar. The enquiry be completed in 60 days and findings shared with this Secretariat. Instructions for school management may also be issued to avoid repetition of similar lapses in future.

Waqar Ayub

WAQAR AYUB
Provincial Ombudsman