


FORM OF ORDER SHEET

Court of _____

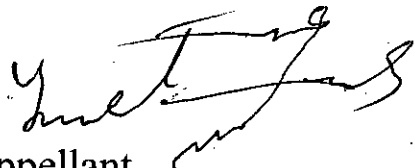
Appeal No. 596/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/04/2024	<p>The appeal of M. Faisal Abbassi presented today by Mr. Muhammad Ayub Khan Shinwari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30 .04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>


2. That the fixation and hearing of the titled Service Appeal at Peshawar is convenient for Appellant and his counsel. Furthermore the main contesting respondents are in Peshawar.

It is, therefore, most humbly prayed that on acceptance of the instant application, the titled Service Appeal may kindly be fixed and heard at Peshawar.

Dated: 25/04/2024


Appellant

Though:-


Muhammad Ayub Khan Shinwari
Advocate Supreme Court of Pakistan

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
ABBOTTABAD.

CM. No:- _____ /2023

In

Service Appeal No. _____ /2022

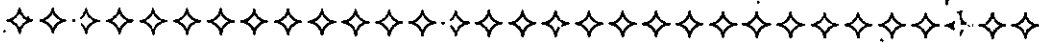
Muhammad Faisal Abbasi

Versus

Govt. of KP

..... Appellant

..... Respondents

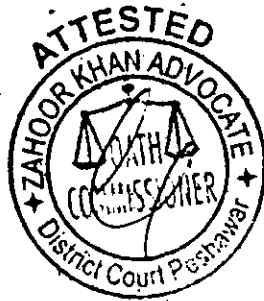


AFFIDAVIT

I, M Faisal Abbasi S/o M Shamraiz Abbasi Subject
Specialist (Economics), GHSS, Ziarat Masoom, Abbottabad, do

*hereby solemnly affirm and declare on oath that the contents of
this accompanying Application are true and correct to the best of
my knowledge and belief and nothing has been concealed from
this Honourable Court.*


DEPONENT



25/04/24

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 596 /2024

Faisal Abbasi

versus

Secty to Govt of KP (E & S) Edu Deptt & others

INDEX

Sr No	Description of document	Dated	Annex	Pg No
1.	Service Appeal and affidavit			1-3
2.	Application and affidavit			4-5
3.	Copies of certificates		A	6-14
4.	Copy of appointment order	01-01-08	B	15
5.	Copy of impugned order	29-11-23	C	16
6.	Copy of Departmental Appeal		D	17-18
7 ⁿ	<i>wakalat nama</i>			19

Dated: / /2024

Yuseef
Appellant,

Through

Muhammad Aayub Khan Shinwari
Muhammad Aayub Khan Shinwari

LL.B; LL.M

ADVOCATE

Supreme Court of Pakistan

CHAMBER

7-A, Haroon Mansion,

Khyber Bazar, Peshawar

Cell: (Clerk) 03219068514

Email: mak_shinwari@yahoo.com

①

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 596 /2024

M Faisal Abbasi S/o M Shamaraiz Abbasi,
Subject Specialist (Economics),
GHSS, Ziarat Masoom, Abbottabad

.....Appellant

Versus

1. Secretary to Govt of Khyber Pakhtunkhwah, Elementary & Secondary Education Department, Peshawar
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwah, Peshawar
3. District Education Officer (M), Abbottabad
4. Principal, GHSS, Ziarat Masoom, Abbottabad

.....Respondents

**Service Appeal under Section 4 of the Khyber
Pakhtunkhwah Service Tribunal Act, 1974 against
order dated 29-11-2023**

Respectfully Sheweth,

Brief but relevant facts of the case are as follows:

1. That the appellant has qualified M. Sc (Economics), Master of Education (M. Ed) and Bachelor of Education (B. Ed). Consequent upon the recommendation of the KP Public Service Commission, the appellant was appointed as Subject Specialist (Economics) by the competent authority vide Notification dated 01-01-2008. (Copy of the Certificates and appointment order is filed herewith and annexed as **Annex-B**)
2. That the appellant received the impugned order dated 29-11-2023 issued by respondent No 4 wherein the appellant was directed to deposit an amount of Rs 1777998/- in PTC account of GHSS, Ziarat Masoom within two weeks. (Copy of Order is filed herewith and annexed as **Annex-C**)
3. That feeling aggrieved of the aforesaid Order, the appellant filed Departmental Appeal but in vain. (Copy of Departmental Appeal is filed herewith and annexed as **Annex-D**)

- Hence, the title Service Appeal on the following amongst other grounds:

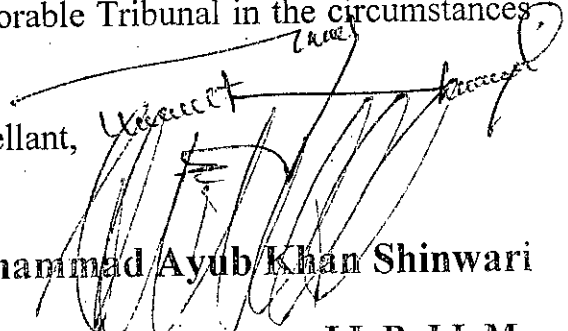
Grounds:

- a. That, the impugned order is against the law, illegal, unlawful, without lawful authority, void and ineffective upon the rights of the Appellant, thus calling interference of this Honorable Tribunal.

- a. That impugned Order is passed without holding any inquiry, without giving any show cause Notice, without giving any chance of hearing to the Appellant, without giving any final show cause Notice to the Appellant, without recording any evidence in utter disregard of the mandatory provisions of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
- b. That the impugned Order is against the principles of natural justice as the Appellant is condemned unheard and it is a well settled principle of law that any order which violate the principle of *audi alteram partem* is nullity in the eye of law.
- c. That the impugned Order is against the principles of administrative law, based on colorful exercise of powers and against the dictums of the August Supreme Court of Pakistan.
- d. That the appellant remained Principal and Drawing Dispersing Officer of the school during the period of September 2020 to September 2022 and has neither misused a single penny of the school funds nor committed any illegality while using the school funds.
- e. That the impugned order is *Coram Non Judice* and is a non speaking order.
- f. That the treatment met to the appellant is against the principles of administrative law, based on colorful exercise of powers and against the dictums of the August Supreme Court of Pakistan.
- g. That the Appellant craves permission of this Honorable Tribunal to rely on other grounds at the time of arguments and produce any additional document if required in support of his Service Appeal.

It is, therefore, prayed that on acceptance of the instant service appeal, the impugned order dated 29-11-2023 be declared as unlawful, illegal, without lawful authority, void ab-initio and ineffective upon the rights of the appellant and the respondents may kindly be directed not to make any deductions from the salary of the appellant in pursuance of the impugned order and reimburse the appellant.

Any other relief which has not been specifically prayed for and deemed fit and appropriate by this Honorable Tribunal in the circumstances may graciously be granted.

Appellant, 

Through

Muhammad Ayub Khan Shinwari

LL.B; LL.M

ADVOCATE
Supreme Court of Pakistan

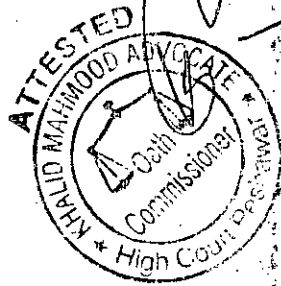
IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No _____/2024

M Faisal Abbasi versus Secty to Govt of KP (E & S) Edu Deptt & others

Affidavit

I, M Faisal Abbasi S/o M Shamaraz Abbasi ,Subject Specialist (Economics), GHSS, Ziarat Masoom, Abbottabad do hereby solemnly affirm and declare on oath that the contents of the title Appeal are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.



Deponent [Signature]

4

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M No _____/2024

in

Service Appeal No _____/2024

M Faisal Abbassi versus Secty to Govt of KP (E & S) Edu Deptt & others

Application for restraining the respondents from making deductions from the monthly salary of the appellant in pursuance of the impugned order till final disposal of the title Service Appeal.

Respectfully Sheweth,

The Applicant submits as follows:

1. That the title Service Appeal is pending adjudication before this learned Tribunal which is fixed for hearing
2. That the impugned order is void ab-initio and the respondents are making deductions from the monthly salary in pursuance of the impugned Order causing an irreparable loss to the appellant as the appellant is solely depending on the monthly salary for his bread and butter.
3. That the grounds in the Service Appeal may kindly be read as a part and parcel of the instant application.
4. That the applicant seeks leave of this Honorable Tribunal to rely on other grounds at the time of arguments.

It is, therefore, prayed that on acceptance of this Application the respondents be restrained from making deductions from the monthly salary of the appellant in pursuance of the impugned order till final disposal of the title service appeal.

Any other relief, deemed appropriate in the circumstances of the case, which is not specifically prayed for may graciously be granted.

Through

Applicant,

Muhammad Ayub/Khan Shinwari
Advocate, Peshawar

5

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M No _____/2024

in

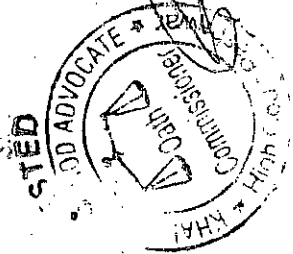
Service Appeal No _____/2024

M Faisal Abbasi versus Secty to Govt of KP (E & S) Edu Deptt & others

Affidavit

I, M Faisal Abbasi S/o M Shamaraiz Abbasi, Subject Specialist (Economics), GHSS, Ziarat Masoom, Abbottabad do hereby solemnly affirm and declare on oath that the contents of the accompanying application are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.

[Handwritten signature]
Deponent



Annex A B

Serial No. 184396

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Certificate No. 008341/08368

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION, RAWALPINDI
SECONDARY SCHOOL CERTIFICATE EXAMINATION ANNUAL 1995

Certified that MUHAMMAD FAISAL son/daughter of
MUHAMMAD SHAMRAZ whose particulars are given below has
passed the Secondary School Certificate Examination held in the month of
MAR-APR 1995 securing 442 marks (FOUR HUNDRED FORTY TWO).

Roll No. 111272 Registration No. 9594510035

Group of subjects SCIENCE Regular/Private REGULAR

As a whole/In Parts AS A WHOLE Grade awarded C

Institution/District GOVT. HIGH SCHOOL, BARIAN, (RAWALPINDI).

Date of birth (In figures) 29-11-79 (In words) 29TH NOV;
one thousand nine hundred and SEVENTY NINE

SUBJECT-WISE DETAIL OF MARKS OBTAINED

S.No.	Name of the subject	Maximum	Obtained
1.	ENGLISH (COMPULSORY)	150	102
2.	URDU (COMPULSORY)	150	086
3.	PAKISTAN STUDIES	75	051
4.	ISLAMIYAT	75	049
5.	MATHEMATICS (ELECTIVE)	100	030 *
6.	PHYSICS	100	037
7.	CHEMISTRY	100	051
8.	BIOLOGY	100	036
Total		850	442

INTERNAL GRADE: C

Zohur Zowar

Rawalpindi Dated 30TH OCT, 1996

SECRETARY

* CONDONEE

Note: This certificate is issued without alteration/erasure.

ATTESTED

ATTESTED

ATTESTED

Serial No.HSC 004196

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Certificate No. 10752401532

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION, RAWALPINDI 78

INTERMEDIATE CERTIFICATE EXAMINATION ANNUAL 1999

Certified that MUHAMMAD FAISAL son/daughter of
MUHAMMAD SHAMRAZ whose particulars are given below has
 passed the Intermediate Certificate Examination held in the month of
APRIL 1999 securing 500 marks (FIVE HUNDRED ONLY).

Roll No. 705519 Registration No. 9780590075

Group of subjects HUMANITIES Regular / Private PRIVATE

As a whole / In Parts IN PARTS Grade awarded D

Institution / District RAWALPINDI

SUBJECT-WISE DETAIL OF MARKS OBTAINED

S.No.	Name of the subject	Maximum	Obtained
1.	ENGLISH	200	054
2.	URDU	200	123
3.	PAKISTAN STUDIES	050	017
4.	ISLAMIC EDUCATION	050	024
5.	ISLAMIC STUDIES	200	105
6.	EDUCATION	200	075
7.	SOCIOLOGY	200	072
8.			
Total		1100	500

Zahur Fawaz

Rawalpindi Dated 15TH MAY 2002

SECRETARY

Note:- This certificate is issued without alteration/erasure.

ATTESTED

ATTESTED

UNIVERSITY OF THE PUNJAB

8

Serial No. 004975 L



Roll No. 005332

Regd. No. 99-cc1-193

RESULT INTIMATION CARD

PASS RESULT INTIMATION

Name of the Candidate: Muhammad Faisal Abbasi

Father's Name: Muhammad Sharariz Abbasi

Candidate mentioned above is hereby informed that

he has passed the B.A. Supplementary Examination 2001 held in October 2001 in the IInd Division, obtaining 399/500 marks. The examination was taken by parts.

Marks obtained by him in each subject are given below:-

S. No.	Subjects/Papers	Marks Obtained	Maximum Marks	Remarks
1.	Isl Studies/Ethics and Fes Studies (Comp)	51	100	
2.	English Language (Comp. B.A.)	75	200	
3.	Economics	99	200	
4.	Political Science	100	200	
5.	Persian (opt)	74	100	
TOTAL		399	500	

Note : This result intimation is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper Certificate / Diploma / Degree which will be issued under the regulations in due course.

Senate Hall, Lahore.

Dated: January 18, 2002

A. J. Khan
Asst. Controller/Admin Officer
(Examinations)

ATTESTED

ATTESTED

Roll No. 005332

Registered No. 99-cci-193

UNIVERSITY OF THE PUNJAB



2001

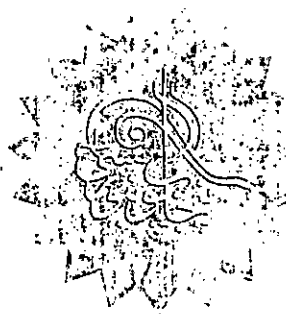
THIS IS TO CERTIFY THAT

Muhammad Faisal Abbasi
Son of *Muhammad Shamaraiz Abbasi*
of the F. G. Post Graduate College for Men, H-8, Islamabad.
(ex-student)

HAS OBTAINED THE DEGREE OF

BACHELOR OF ARTS

In this University at the examination held in October 2001,
securing 399/800 marks and was placed in the Second Division.
The examination was taken in parts.



Lahore

Controller of Examinations

Chancellor

A.C.

ATT/STED

006976

ATT/STED



International Islamic University

10

ISLAMABAD - PAKISTAN

P.O. Box. No. 1243 Telegram ALJAMIA Telex. 54068 IIU PK, Fax 2250821 Tel. 9257997

TRANSCRIPT

Registration No. 132-SE/M.Sc(EF)/02 Roll No. 6647
 Name of Student MUHAMMAD FAISAL ABBASI
 Father's Name MUHAMMAD SHAMARAIZ ABBASI
 Faculty/Department SCHOOL OF ECONOMICS
 Degree Programme M. SC. ECONOMICS & FINANCE
 Duration of the Programme SEPTEMBER 2002 TO AUGUST 2004
 Completed in AUGUST 2004

Course No.	Title of Course	No. of credit hours	Grade obtained
PREPARATORY COURSES			
E6150	Microeconomic Analysis	3	Pass
E6160	Macroeconomic Analysis	3	Pass
E6170	Mathematical Economics	3	Pass
REGULAR COURSES			
AR101	Arabic - I	3	A
AR102	Arabic - II	3	A
UR109	Islamic Studies	3	A
E6611	Fiqh al Maumalat - I	3	B
E6612	Fiqh al Maumalat - II	3	A
E6171	Mathematics for Economic & Finance	3	B+
E6182	Statistics for Economic & Finance	3	C
E7010	Microeconomic Theory	3	B
E7050	Macroeconomic Theory	3	A
E7151	Islamic Economics	3	A
E7152	Islamic Banking & Financial Markets	3	B+
E7211	Econometrics	3	B+
E7321	Financial Accounting	3	A
E7322	Corporate Finance	3	A
E7323	International Trade & Finance	3	B+
E7324	Investment Analysis & Portfolio Management	3	A
E7401	Computer Packages for Eco. & Finance	3	A
E7402	Project Appraisal & Management	3	A
E7403	International Business Strategy	3	B
E7404	International Development & Finance	3	C+
E7325	Multinational Corporations	3	B
E7405	Managerial Economics	3	A
E7408	Financial Economics	3	B+
E7251	Monetary Theory & Policy	3	B+
E7409	Banking Operations & Risk Management	3	B+
E7411	Financial Accounting-II	3	A

Cumulative Grade Point Average: 3.57/4.00 Percentage of Marks: 78.73 %
 Total Number of Credit Hours Passed: 78

Prepared by [Signature]

Checked by [Signature]

Assistant Adm. Officer (Examinations)

Director (Examinations)

Dated:- 24-02-2005

Key to letter grades:

80% and above	A
75-79.5%	B+
70-74.5%	B
65-69.5%	C+
60-64.5%	C
55-59.5%	D+
50-54.5%	D

ATTACHED

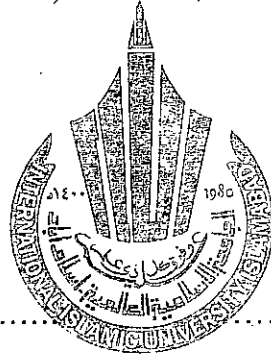
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00062

Serial No رقم المسلسل

Registration No 132-SE/M. Sc. (EF)/02 رقم التسجيل

INTERNATIONAL ISLAMIC UNIVERSITY
Islamabad - Pakistan



الجامعة الإسلامية العالمية
إسلام آباد - باكستان

This is to certify that MUHAMMAD FAISAL ABBASI

Son / Daughter of MUHAMMAD SHAMARATZ ABBASI

on having fulfilled the prescribed requirements in the examinations
held in August, 2004 is awarded the degree of

MSc in Economics & Finance

He/She secured Cumulative Grade Point Average of ^{3.57} out of 4.0

We pray Allah to guide him / her to serve Islam and Knowledge.

Muhammad Asif
مدير الشؤون الأكاديمية

Director (Academics)

ATTESTED

رئيس الجامعة
President

ATTESTED

Issued in Islamabad on 12th March, 2005 صدرت في إسلام آباد بتاريخ

تشهد الجامعة أن محمد فيصل عباسي

ابن / بنت محمد شامراز عباسي

قد أتم المتطلبات الدراسية للجامعة في الامتحان المنعقد
في أغسطس 2004 ومنح / منحت بناء على ذلك درجة

الماجستير في الاقتصاد والتمويل

ونال / نالت الدرجة بمتوسط قدره ٣.٥٧ نقطة من 4 نقاط

نسأل الله أن يوفقه / يوفقها لخدمة الإسلام والعلم

Zafar Anwar
نائب رئيس الجامعة للشؤون الأكاديمية

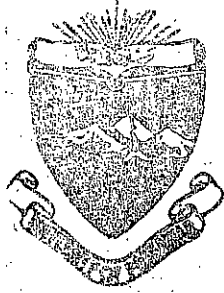
Vice President (Academics)

No. 0005131

12

[Signature]

University of Peshawar
Pakistan



Detailed Marks Certificate

Bachelor of Education

(B.Ed)

Annual Examination 2011

JRK Hazzara College of Education Abbottabad



Regular

Name: MUHAMMAD FAISAL ABBASI

Gender: Male

Roll No: 1432

Father's Name: MUHAMMAD SHAMRAIZ
ABBASI

Registration No: 2010-HCE-215

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Persp: of Edu: & Cont Social Issues	100	63	Sixty Three
School Org: & Classroom Manag: (New)	100	46	Forty Six
Edu: Psychology, Guidance & Counseling	100	58	Fifty Eight
Evaluation Techniques	50	30	Thirty Only
Curriculum & Instruction	100	63	Sixty Three
Functional English	50	41	Forty One
Islamiat/I. History (for non-muslim) (New)	100	73	Seventy Three
Method of Teaching of English	100	46	Forty Six
Method of Teaching of Urdu	100	48	Forty Eight
Elec: Modern Approaches to Teaching	100	53	Fifty Three
Practice of Teaching:	200	153	One Hundred and Fifty Three
	1100	674	Six Hundred and Seventy Four

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 24-Jun-2011 to 16-Jul-2011

Result Declared on Tuesday, November 29, 2011

Issue Date: 30-Nov-2011

5:03 pm

Computerized by RTC

ATTESTED

[Signature]
(Iftekhar Hussain Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

ATTESTED

13
19



University Of Peshawar

(Pakistan)



Session: Annual 2011

MUHAMMAD FAISAL ABBASI

Son Of

MUHAMMAD SHAMRAIZ ABBASI

and a

Student Of

JRK Hazzara College of Education Abbottabad

having Passed the

prescribed examination held in June 2011 is this day admitted by the University Of Peshawar to

the Degree of Bachelor of Education In 2nd Division in Theory

In 1st Division in Teaching Practice In 1st Division in Aggregate

He Passed also in MODERN APPROCHES TO TEACHING as an Elective subject

The examination was taken as a whole

Registration No. 2010-HCE-215

Roll No. 1432

C.N.F.C.No. 61101-9114297-5

Result Declared on November 29, 2011

ATTESTED



030473

[Signature]

Registrar

[Signature]

Vice Chancellor

ATTESTED
ATTESTED

45% (Internal, Final)	40%
45%	45%
1st Div	1st Div
2nd Div	2nd Div
1st Term 15, 2nd Term 15 + 6 (Theory)	
Professional course in each term	
Selected professional course	



Professional Subjects:
 (A) MedPC (01) Secondary Education in Pakistan
 (B) MedPC (02) Secondary Education in Pakistan
 (C) MedPC (03) Teaching Education in Pakistan
 (D) MedPC (04) Special Education in Pakistan
 (E) MedPC (05) Non Formal & Distance Education
 (F) MedPC (06) Entry Enghous Education
 (G) MedPC (07) Adult Education
 (H) MedPC (08) Guidance & Counseling

Federal Urdu University

Of

Arts, Science & Technology

M.Ed.(One Year) ANNUAL EXAMINATIONS-2011, Held in JUNE 2012

Markz Certificate

دہاتی اردو یونیورسٹی برائے فنون، سائنس اور ٹیکنالوجی

ایم ایڈ ایک سال پروفیشنل اسٹڈیز امتحان ۲۰۱۱ء منعقدہ جون ۲۰۱۲ء

مارکس سرٹیفکیٹ

Academic Record of: Muhammad Faisal Abbasi

S/o, D/o: Muhammad Shamaraz Abbasi

Seat No: 211

Affiliated Institute: Al-Wadood Institute of Professional Studies, Islamabad

Enrolment No: AW/M.Ed/6016/11-12

1st Term			2nd Term			1st Term Professional Course			2nd Term Professional Course			Thesis	Total	Result	Remarks																		
I	II	III	IV	V	VI	VII	VIII	IX	X																								
Foundation of Education	Advance Educational Psychology	Educational Research	Curriculum Development & Implementation	Test Construction & Evaluation	Educational Management	Elementary Education in Pakistan	Secondary Education in Pakistan	Teachers Education in Pakistan	Guidance & Counseling																								
Internal Evaluation	Final Exam	Total	Internal Evaluation	Final Exam	Total	Internal Evaluation	Final Exam	Total	Internal Evaluation	Final Exam	Total	Internal Evaluation	Final Exam	Total																			
16/40	24/60	40/100	16/40	24/60	40/100	16/40	24/60	40/100	16/40	24/60	40/100	16/40	24/60	40/100	80/200	540/1200																	
37	33	70	35	37	72	35	41	76	30	41	71	35	34	69	35	32	67	35	40	75	30	30	60	35	43	78	36	43	79	150	866	1st	

Prepared by: [Signature]

ATTESTED

Checked by: [Signature]

Controller of Examinations: [Signature]

Dated: 15 APR 2012

Place of Issue: Karachi

Note: University reserves the right to correct any inadvertent error that may be detected in the Proforma.

[Handwritten Signature]

13
Annex B

**GOVERNMENT OF NWFP
SCHOOLS & LITERACY DEPARTMENT**

Dated Peshawar the 01-01-2008.

NOTIFICATION

NO.SO(S)3-2/2006/SS(Male). Consequent upon the recommendations of the NWFP Public Service Commission, the Competent Authority has been pleased to appoint the following Subject Specialists (Male) in various subjects in BPS-17 (Rs:8210-615-20510) plus usual allowances as admissible under the rules on Regular basis but without pension and gratuity in terms of Section-19 of the Civil Servant Act 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005 with immediate effect under the provision of Establishment & Administration Department Circular bearing No.SOR-6 (E&AD) 13-1/2005 dated 10-8-2005:

1-	Arif Ali S/O Aman-Ur-Rehman, Aman Sons Chemist & Drugesit Sikandar Pura Peshawar.
2-	Zia-Ur-Rehman Awan S/O Professor Aziz-Ur-Rehman, Vill:Ko ka Feroz PO Nizam Bazar Tehsil & District Bannu.
3-	Muhammad Hanif S/O Abdur Rasheed Khan, House No.1720 C/O Khurshid Alam Main Bazar Nawa Sher Abbottabad.
4-	Muhammad Najib Uddin S/O Faridoon Vill: Haibat Gram PO Thana Malakand Agency.
5-	Muhammad Ali Asghar S/O Ghulam Qadar, 286 Nawab Ali Road Bekit Gunj Mardan.
6-	Zahid Younis S/O Muhammad Younis Vill: & PO Latamber Tehsil & District Karak.
7-	Arifullah Khan S/O Muhammad Younis Vill: & PO Azim Qilla Tehsil & District Bannu.
8-	Maqsood Ali S/O Abdul Jalil Vill: & PO Sard China Moh: Nawar Khel Tehsil Lahor & District Swabi.
9-	Alamghir Khan S/O Feroz Khan, New Tribal Hostel Islamia Collegite School University Peshawar.
10-	Muhammad Faisal Abbasi S/O Muhammad Shamroz Abbasi, PO Barkat Moh:Usman Abad District Islamabad.
11-	Fazal Rehman S/O Muhammad Bashir C/O Bismillah Khan General Store opposite Bus Ada Shah, Dara Mingora Swat.

2- On their appointment they are posted in Government Higher Secondary Schools as noted against each subject to the conditions given below:

S.No.	Name	To be Posted as.	Remarks.
1-	Arif Ali S/O Aman-Ur-Rehman	SS (Chemistry) (BS-17) GHSS Sufaid Sang Peshawar.	Against Vacant Post.
2-	Zia-Ur-Rehman Awan S/O Professor Aziz-Ur-Rehman;	SS (Biology) (BS-17) GHSS Kot Gurh D.I.Khan.	--do--
3-	Muhammad Hanif S/O Abdur Rasheed Khan	SS (Biology) (BS-17) GHSS Berot Abbottabad.	--do--
4-	Muhammad Najib Uddin S/O Faridoon.	SS (Biology) (BS-17)GHSS Palai Malakand.	--do--
5-	Muhammad Ali Asghar S/O Ghulam Qadar	SS(English) (BS-17) GHSS Nawagai Bunnr.	--do--
6-	Zahid Younis S/O Muhammad Younis	SS(English) (BS-17) GHSS Landi Kachi Kohat.	--do--
7-	Arifullah Khan S/O Muhammad Younis	SS(English) (BS-17) GHSS Dalan Hangu.	--do--
8-	Maqsood Ali S/O Abdul Jalil	SS(English) (BS-17) GHSS Mansabdar Swabi.	--do--
9-	Alamghir Khan S/O Feroz Khan	SS(English) (BS-17) GHSS Adazai Peshawar.	--do--
10-	Muhammad Faisal Abbasi S/O Muhammad Shamroz, Abbasi	SS (Econ) (BS-17) GHSS Richban Abbottabad.	--do--
11-	Fazal Rehman S/O Muhammad Bashir	SS (Econ) (BS-17) GHSS Kalam Swat.	--do--

ATTESTED

ATTESTED

TERMS & CONDITIONS.

- 1- Their services will be considered regular but without pension or Gratuity in term of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2- Their services will be liable to termination on one month's notice from either side. In case of resignation without notice their two month's pay/allowances, shall be forfeited to Government.
- 3- The appointee should join his post within 30-days of the issue of this notification. The Director, Schools & Literacy, NWFP, Peshawar would furnish a certificate to the effect that the candidates have joined the post or otherwise, after one month of the issue of this Notification, failing which his candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 4- They would be on probation for a period of two years extendable for another one year.
- 5- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 6- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from Service (Special Power) Ordinance, 2000 and the Rules framed from time to time.
- 7- Charge report should be submitted to all concerned.
- 8- No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY

ENDST. NO. & DATE EVEN.

Copy forwarded for information & necessary action to:

- 1- Accountant General, NWFP, Peshawar.
- 2- Director, Schools & Literacy, NWFP, Peshawar.
- 3- Director of Education (FATA) Peshawar.
- 4- District / Agency Accounts Officers Concerned.
- 5- EDOs, S&L Concerned.
- 6- PS to Minister for Education, NWFP, Peshawar.
- 7- PS to Chief Secretary, NWFP, Peshawar.
- 8- PS to Secretary, Schools & Literacy Deptt. NWFP, Peshawar.
- 9- Candidates Concerned.
- 10- Director Recruitment, NWFP Public Service Commission, Peshawar.
- 11- Deputy Database Administrator, EMIS, S&L Deptt. NWFP.
- 12- PA to Additional Secretary, S&L Deptt. NWFP.
- 13- PA to Deputy Secretary (Admn) S&L Deptt. Peshawar.
- 14- Office order file.


(NASRULLAH KHAN)
SECTION OFFICER (SCHOOLS)

M-Tahir/Rafiqullah
Taj Muhammad

ATTESTED

Annex C 16

OFFICE OF THE PRINCIPAL GHSS ZIARAT MASOOM, ABBOTTABAD

Endd No: 256

Date: 29-11-2023

To

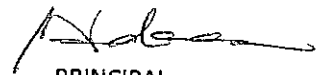
Faisal Abbasi (SS Economics)
GHSS Ziarat Masoom,
Abbottabad

Subject: **RECOVERY OF AMOUNT ILLEGALLY DRAWN BY MR. FAISAL ABBASI SS / Ex**
IN CHAREG GHSS ZIARAT MASOOM

Memo:

With reference to letter No 10349 dated 22 November, 2023 you are hereby directed to deposit the amount of Rs- 1777998 within 2 weeks positively as per head and schedule mentioned below

1. Minimum amount of Rs- 1150210/- be recovered from him and deposited in school PTC account.
2. Rs-100123/- be recovered and deposited in SSC pupil fund account to make the difference between the cashbook balance and bank account balance pupil fund (secondary section).
3. Profit of PTC fund amounting Rs- 524665/- be recovered and deposited in Government treasury.



PRINCIPAL

GHSS ZIARAT MASOOM

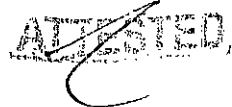
COPY FORWARD TO

1. District Education Office (M) ABBOTTABAD



PRINCIPAL

GHSS ZIARAT MASOOM



Annex D 17

The Director,
Elementary and Secondary Education,
Peshawar, KPK.

Subject: Departmental Appeal against the letter: Recovery of amount illegally drawn by Mr. Faisal Abbasi SS/ Ex in charge principal GHSS Ziarat Masoom, Endst. No:256, Dated 29/11/2023, by Principal GHSS Ziarat Masoom.

Dear Sir,

With due respect, it is stated that the appellant received a letter from Principal GHSS Ziarat Masoom, vide letter no. 256, Dated 29/11/2023, wherein it is shown that it was issued vide letter no.10349, dated 22/11/2023, issued by the office of DEO (male), Abbottabad, that directed to deposit amount of Rs. 1777998/- in PTC Account of GHSS Ziarat Masoom within 2 weeks. Now I am appealing against the same.

Dear Sir, I remained in charge principal of this school from September 2020 to September 2022. During my tenure, I was the Drawing Dispersing Officer of the school. I make all efforts to enhance the school curriculum and co-curriculum activities for the betterment of students and the community as a whole. Besides this, the devastating condition of the school appealed to me the most and it was very difficult to continue the classes in this situation of the school, where, classrooms are in black and torn doors and windows and glasses of the windows. Torn plasters on the walls and lack of furniture and classroom accessories. Very devastative condition of paints and many other building related things. Being in charge Principal it was my duty to provide education education-friendly environment to the students and staff to boost the curriculum activities.

That time was ceased by the covid-19 pandemic and many steps have to be taken for SOP to safeguard the students, staff, and their belongings. Emergency expenditures were needed there. In 2021, the roof of 3 rooms was also blown in a heavy wind storm.

Nothing was in the school for security purposes, when I took charge of the school. I have installed 14 security cameras in the whole school, including classrooms and outside areas. The boundary wall is fenced with razor wire and concrete work is done behind the boundary wall of 250*3 feet and at the main door and parking areas of about 700 sqr. feet as well. Purchase of 80 Tablet chairs, Repair of more than 100 chairs already broken, and Principal office furniture is also done in my tenure.

The washroom for the students was maintained and 2 new washrooms were constructed due to the urgent need of the school, 1 for the principal office and the other for the upper portion of higher secondary classes. Besides, the garden is lo maintained and many flowers and gamlas were purchased for the school renovation. The whole building is painted for a fresh look including the rooftop after the maintenance of doors, windows, cupboards, laboratories, library, kitchen, torn plasters of walls, and all other required work for the maintenance of the building.

Exams, sports, student workbooks, and ceremonies and functions are also done from this fund.

~~ATTESTED~~

All work is done with the consent of the PTC Committee and the chairman of PTC. Resolutions of PTC are also presented to the inquiry committee. Even more than Rs. 75000/- is paid from my pocket.

High-ups of the department are notified many times to utilize the funds for the betterment of school buildings, students, and classrooms. Do not keep them idle as they are the purpose of school. I utilized the whole funds very carefully and loyally for the betterment of the school and community and all the purchases were done by the purchase committee and chairman PTC with his team also aware and cooperating in the whole process.

Bank profit is also utilized as I was unaware of the fact that this amount should be submitted to the government treasury account, even though no one knows in principals and DEOs before June 2022, when the department notified to deposit this amount to govt. treasury account.

I was new to this court, inexperienced, and unaware of many facts, that might create some loopholes in the maintenance of fund records, otherwise, nothing was misused during my tenure.

It is very regretful that an Inquiry is initiated merely on the demand of some opponents and a person junior to me is nominated as inquiry officer, who blames various areas and persons without any proof. These activities torture me a lot and damage my reputation. Then on my application, the inquiry was given to another person but soon his inquiry was canceled without any solid reasons, just for the pleasure of opponents, and another inquiry team was sent which was not a team but a man show. I show them all these things and demand to physically verify every expenditure.

After all, I didn't receive a single detail of the inquiry report for what I have to deposit money back into the PTC account. Even once DEO (M) Abbottabad called me for a personal hearing. I went there but DEO was not available and Dy. DEO just told me about withdrawals verbally. No detail is provided.

It seems fiction and injustice to victimize me just because I was in charge principal and not in line with the insane demands of some people, especially one of the staff members who remained on duty for the whole session and tried to convince the public against me just on my demand to remain present in the school for the sake of students.

Therefore you are humbly requested to reconsider the matter and consider my appeal with your kind consideration. I swear, I haven't used a single penny out of school. I am very much shocked and suffering with these tactics. I am a bonafide and dutiful teacher of the department and many of the Principals are evident in my duties. Be kind to me to consider the matter with sympathy and my services should be taken into view.

I will be thankful to you with a core of my heart.

Yours faithfully,

Muhammad Faisal Abbasi
Muhammad Faisal Abbasi

Subject specialist (Economics)

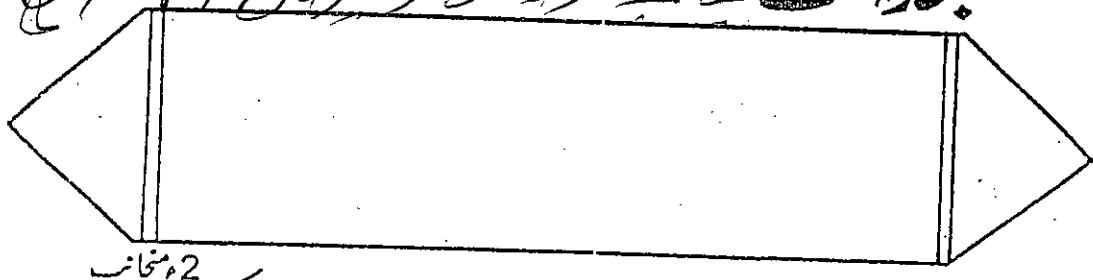
GHSS Ziarat Masoom, Abbottabad.

28/12/2023

Copy to
1. D.E.O (M) Abbottabad

ATTESTED

بعد التضا - زوس سیریس کیل ۲۰۲۴/۰۴/۲۵



۲۰۲۴/۰۴/۲۵

موزخہ
مقدمہ
دعویٰ
جرم

بنام
۶/۵ سیریس کیل ڈیولپمنٹ ایجوکیشن

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے لیے محمد اویس خان سیکرٹری ایجوکیشن
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک در و پیرا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو یہی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے اس کے لیے
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

ATTESTED
ACCEPTED

المرقوم 25/04/2024

Handwritten signature and notes on the right margin, including the word 'Court' written vertically.

واہ الع

بمقام کے لئے منظور ہے۔