


FORM OF ORDER SHEET

Court of _____

Appeal No. 708/2024

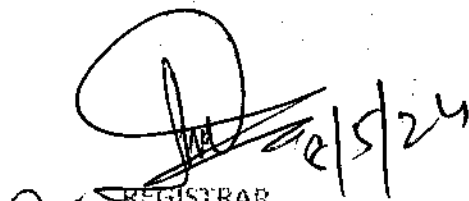
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/05/2024	<p>The appeal of Mst. Afsana Kausar re-filed today by registered post through M.Arshad Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 26.06.2024. Counsel for the appellant has been informed telephonically .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Afsana Kausar received today i.e on 08.05.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 & 4 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- ② Amended memo of appeal shall also be provided for spare copies.
- ③ Copy of departmental appeal is not attached with the appeal be placed on it.
- ④ Copy of inspection report mentioned in para-7 of the memo of appeal (Annexure-C) is not attached with the appeal be placed on it.

No. 1138 /S.T.,

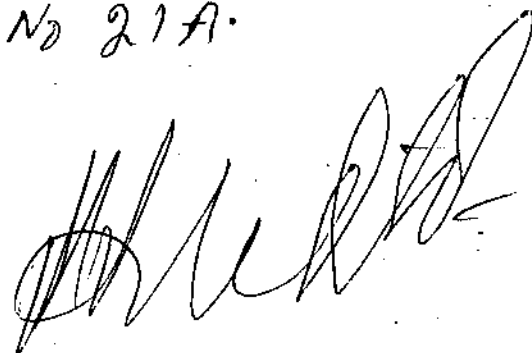
DL 8-5- /2024.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M.Arshad Tanoli Adv.
High Court. A.Abad.

sw

objection removed. Appeal
of the appellant is placed
at page No 21A.



22/5/2024

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Service Appeal No. 708 /2024

Afsana Kausar daughter of Muhammad Rashid Abbasi, presently Govt. Girls Primary School Berote Tehsil & District Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

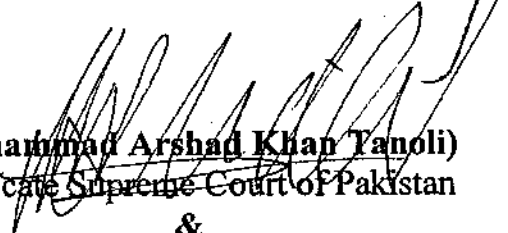
INDEX

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 8	
2.	Copies of agenda meeting and resolutions of PTC members	9 to 14	"A"
3.	Copy of statements of account	15 to 19	"B"
4.	Copy of inspection report	20	"C"
5.	Copy of notice No. 767-70 dated 09/04/2016	21 to 27	"D"
6.	Wakalatnama		



...APPELLANT

Through

Dated: _____/2024


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&


(Muhammad Ibrahim Khan)
Advocate High Court

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Service Appeal No. 708/2024

Afsana Kausar daughter of Muhammad Rashid Abbasi, presently Govt. Girls Primary School Berote Tehsil & District Abbottabad.

...APPELLANT

VERSUS

1. Director Elementary and Secondary Education, Peshawar.
2. District Education Officer, (Female), Abbottabad.
3. Mst. Asia Bibi GGPS Berote Abbottabad.

...RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF
SERVICE TRIBUNAL ACT 1974 FOR
DECLARATION TO THE EFFECT THAT NOTICE
NO. 767-70 DATED 07/04/2016 ISSUED BY
RESPONDENT NO. 3 REGARDING RECOVERY OF
SO-CALLED MONEY AMOUNTING TO
RS.1,809,927/- WHICH IS ILLEGAL, AGAINST THE
FACTS AND CIRCUMSTANCES FOR THE
construction of EXPENSES OF GOVERNMENT GIRLS
PRIMARY SCHOOL BANDI BEROTE**

ABBOTTABAD. THE IMPUGNED NOTICE ISSUED BY RESPONDENTS' DEPARTMENT IS ILLEGAL AND IS LIABLE TO BE SUSPENDED.

PRAYER: ON ACCEPTANT OF THE INSTANT SERVICE APPEAL, THE IMPUGNED NOTICE NO. 767-70 DATED 07/04/2016 REGARDING RECOVERY OF RS.1,809,927/- MAY BE SET-ASIDE AND DE-SEALING OF ACCOUNT NO. 4072685704 IBAN PK02NBPA0927004072685704 OF THE APPELLANT MAY BE ORDERED. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM FIT AND APPROPRIATE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

Brief Facts of the case are as under:-

1. That the appellant is resident of Bandi Berote Tehsil & District Abbottabad and is performing duties as Head Teacher in Govt. Primary School Bandi Berote Abbottabad.
2. That there was no outer wall of the Govt. Girls Primary School Bandi Berote and due of this

reason a sum of Rs. 2,939,927/- was allocated by the respondents' department for the construction of outer wall, of 02 rooms, 09 toilets to meet the needs of the girls school.

3. That for the above mentioned construction works, no formal tender was issued by the respondents but (PTC) Parents Teacher Council was constituted and respondent No. 4 was also included as member of the said PTC. Copies of agenda meeting and resolutions of PTC members are attached as Annexure "A".
4. That at the spot supervision of the construction work was carried out by the said PTC (Parent teacher) Council and during the pendency of construction work the officers also paid visits at the spot to check the progress of construction work. No objection certificate was issued by the respondents' department which reflects their satisfaction about the construction work done.
5. That the construction work was carried out and expenses were spent through joint account run by the appellant, PTC and respondents' department.

6. That a sum of Rs. 24,97,000/-, have been spent and remaining amount of Rs. 5,58,785/- was available in the account of the bank while plaster of walls of rooms, floor and installation of doors are pending while outerwall, latrine water pipe line fitting have been completed. Electrification cost Rs. 8,380/- has been spent and remaining amount Rs. 1,20,000/- deposited in Bank account which is laying for installation of credials for children/students. Copy of statements of account is attached as Annexure "B".
7. That entire work carried out with good faith on the basis of approval by PTC. Inspection of site can be verified by C&W Department to assess the cost of work done. Copy of inspection report is attached as Annexure "C".
8. That a notice No. 767-70 dated 09/04/2016 was issued regarding recovery of amount of Rs.1,809,927/- by respondents' is nothing only, but black mailing tactics which is illegal, non-operative on the part of the appellant. Copy of notice No. 767-70 dated 09/04/2016 is attached as Annexure "D". Hence, the appellant filed departmental appeal on 3/4/24 but of no avail.

Besides, respondents have not acted upon the impugned notice so far. Therefore, the instant service appeal is being filed inter-alia, on the following grounds:-

GROUND:

- a) That the appellant being the chairman of PTC (Parent Teacher council) utilized the funds amount to Rs. 2,497,000/- after getting proper permission from the PTC through resolution. Besides, all the IN and OUT of expenditures occurred on the building of said school are available in record duly endorsed by PTC. Hence, the recovery against the appellant is illegal.
- b) That the appellant is not a Govt. Contractor but is a teacher. There is no law which authorizes the respondents' department to direct the petitioner to construct buildings etc in the school. As per law, the respondents' department was supposed to issue tenders to the Govt. registered contractor for the purposes of construction in the said school.

- T
- c) That the construction work carried out by the petitioner through PTC is more than the work done if it was done by Govt. Contractor. It is further submitted that department as well as this Honourable Tribunal may refer the case of construction to C&W department to assess whether the fund allocated by the department for construction work at Govt. Primary School Bandi Berote has been utilized or otherwise by the appellant.
- d) That the main controversy arose, when respondents' department through different tactics tried their best to get percentage amount out of the govt funds but appellant being honest teacher refused to succumb to their illegal demands gratification which resulted into illegal recovery of Rs. 1,809,927/- which is malafide against the law and rules on the subject.
- e) That the expenditure receipts from the concerned quarters were to be verified prior to the imposition of recovery of an amount to Rs. 1,809,927/- against the appellant. But


respondents' department has miserably failed to get the procurement receipt verified from the quarter concerned and imposed the recovery on their whims and wishes. Hence, the impugned recovery as per law is not maintainable and same may not be recovered from monthly salary as well as from pensionary benefits at the time of the appellant.

It is, therefore, humbly prayed that, on acceptant of the instant service appeal, the impugned notice no. 767-70 dated 07/04/2016 regarding recovery of Rs.1,809,927/- may be set-aside and de-sealing of account no. 4072685704 Iban pk02nbpa0927004072685704 of the appellant may be ordered. Any other relief which this Honourable Tribunal deem fit and appropriate may also be granted to the appellant.


...APPELLANT

Through


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&

(Muhammad Ibrahim Khan)
Advocate High Court

Dated: _____/2024

VERIFICATION:-

Verified that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein.


...APPELLANT

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Service Appeal No. _____/2024

Afsana Kausar daughter of Muhammad Rashid Abbasi, presently Govt. Girls Primary School Berote Tehsil & District Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Afsana Kausar daughter of Muhammad Rashid Abbasi, presently Govt. Girls Primary School Berote Tehsil & District Abbottabad*, do hereby solemnly 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 concealed therein from this Honourable Court.



DEPONENT

Annex - A

از دفتر گورنمنٹ گراؤ پریمری سکول باڑی پیر، پیر کل بیروت، تحصیل و ضلع ایبٹ آباد
 دہلی - 15۔ یکم ستمبر 2015ء

مخبرہ: اسکول کی عمارت کی تعمیر کا کام شروع کیا جائے
 آنحضرت 9 اگست 2015 کو سکول کو کونسل کے مشنک لیکچر
 عمارت کے عیسائی ممبروں نے ہر ممبر کو فنڈ دینے کا حکم دیا۔ سکول
 کو کونسل کے اہل اس میں 2 لاکھ روپے فراہم کیے گئے۔ چار ممبران
 کی کمیٹی تشکیل دی گئی جس میں سر نقالی الاکین،
 رضوان حسین، ان ممبران نے جملہ فنڈ جمع کیا ہے۔ پی۔ پی۔ سی
 ممبران کی زیر نگرانی کام کر رہا ہے۔
 حکومت K.P.K کے طرف سے ملنے والی رقم
 29,48,000 روپے ہے۔ سکول کے شروع
 عمارت کے ممبروں نے اسکول کو تعمیر کرنے کی اجازت
 دی ہے۔ عمارت کے نام "گورنمنٹ پریمری سکول" ہے۔ مبلغ 50000
 روپے فراہم کر کے اسکول کے لئے کی اجازت
 دی ہے۔ اور سکول کے کام جلد شروع ہو جائے
 ہوگا۔ اسکول کے کارڈ نظام ہوگا۔

دستخط اراکین:

دستخط	نام
	حبيب الرحمن
	احسن احمد
	عابد حسین

دستخط	نام
	نازیم رازا
	راجاں کومار
	ارحمان حسین

Attested

Head Teacher
 G.G.P.S. Bandi Birote

Chairperson P.T.C.
 G.G.P.S. Bandi Birote
 Teh. & Distt. ATD

Attested

33
33

33	33
33	33
33	33
33	33

Attested

33	33
33	33
33	33
33	33

33

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10

ادفتر گورنمنٹ گرلز پرائمری سکول یا لڑکیوں کے اسکول تحصیل موضع باندی بیروت

لیا گیا ہے۔

آج مورخہ 12-12-2015 کو گورنمنٹ گرلز پرائمری سکول
 یا لڑکیوں کے اسکول میں ایک میٹنگ ہوئی جس میں
 صدر اور سیکرٹری نے تمام افسران اور اساتذہ کرام کو
 متنب کیا کہ اسکول کی تعمیر کے اخراجات سے متعلق
 ایک بینک اکاؤنٹ کھولا جائے گا جس میں تمام
 اخراجات جمع کیے جائیں گے اور اسکول کی تعمیر
 کے لیے اس سے رقم اخذ کی جائے گی۔ اس کے لیے
 ایک بینک ریٹ میں سے رقم اور ضرورتوں
 کے لیے ضروری اخراجات کے لیے اس سے اخراجات
 کی رقم 1800000 روپے رقم بینک
 میں سے رقم اخذ کی جائے گی تاکہ کام
 جاری ہو سکے۔ اس کے لیے تمام افسران
 کو متنب کیا گیا کہ تمام اخراجات
 اس کے لیے ہی جمع کیے جائیں۔

کل رقم 5000000 روپے

Five Lac only

تاریخ	موضوع
12-12-2015	تعمیرات کے اخراجات
12-12-2015	ریکارڈنگ
12-12-2015	صرفہ خانہ

تعمیرات کے اخراجات

تاریخ	موضوع
12-12-2015	تعمیرات کے اخراجات
12-12-2015	ریکارڈنگ
12-12-2015	صرفہ خانہ

تعمیرات کے اخراجات

Albano

33
Chairperson P.T.C
G.G.P.S Bandi Birote
Teh. & Dist. ATD.

Attested

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Chalperson P.T.C
G.P.S Bandi Brote
Telh. & Distt. ATD

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از دفتر گورنمنٹ گرلز پریمری سکول بانڈی بیره
لی۔ لی۔ سی۔

انجمنہ 16.10.2016 کو گورنمنٹ گرلز پریمری سکول
بانڈی بیره میں پریکٹس ٹیسٹ کے لئے
مقررہ وقت پر پہنچنے والی طالبات کی
فہرست درج ذیل ہے اور فیس 200/- روپے
اور ایکل کے لئے 500/- روپے اور اسکول کے
بھانڈے کے لئے 35000/- روپے
تین دنوں کے اندر اس رقم جمع کر کے
مکمل ہو جائے ورنہ سکول کے کام کی تکمیل
میں تاخیر کا اندیشہ ہے۔ اس لئے
اس پر فوری عملدرآمد کی ضرورت ہے۔
اس کے علاوہ اسکول کے کام کی تکمیل
کے لئے اس پر فوری عملدرآمد کی ضرورت ہے۔
اس کے علاوہ اسکول کے کام کی تکمیل
کے لئے اس پر فوری عملدرآمد کی ضرورت ہے۔

تاریخ

نام	پتہ
ریکا زون	ریکارڈ کوارٹر
صفیہ خانم	صفیہ خانم
نہال	نہال

نام	پتہ
حسب الرحمن	حسب الرحمن
عابد حسین	عابد حسین
اسرار	اسرار

Attested

مقررہ وقت پر پہنچنے والی طالبات کی فہرست

Chalperson P.T.C
G.G.P.S Bandi Birole
Tel. & Distt. ATD.

National Bank of Pakistan

Account Statement

Annex-B

Account Title(s): P-T-A-A-C ABDUL QAYUM AND
 NAGINA KAUSAR
 Address: ZAKIA BEGGUM (R/O BANDI) P/C B
 IROTE TEH ABBOTABAD

Town:
 District:
 City: ABBOTABAD
 Province/State: KH. PAKHTOON
 Country: PAKISTAN

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Postal Code:

Product Name:
 CIF No: 5685699
 Account No: 4072685704
 ISAN: PK02NBPA0927004072685704

Branch Code/Name: 927 Birote Branch
 Region Name: Abbotabad

Statement of Account

Statement Printing Date: 29-Apr-2016

B/F Balance: 448,734.50

From: 01-Apr-2016

To: 29-Apr-2016

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
1	28-Apr-2016	CASH DEPOSIT					558,784.00
2	28-Apr-2016	CASH DEPOSIT			0.00	110,000.00	668,784.00
3	28-Apr-2016	CASH DEPOSIT (Reversal)			0.00	110,000.00	558,784.00
4	28-Apr-2016	CASH DEPOSIT (Reversal)			0.00	(110,000.00)	448,784.00
5	28-Apr-2016	CASH DEPOSIT			0.00	(110,000.00)	338,784.00
Total 3 Credit transactions of amount: 110,000.00						110,000.00	558,784.00
Total 0 Debit transactions of amount: 0.00							

Allesha

[Signature]

Receiver Signature

Date

NATIONAL BANK OF PAKISTAN

P. M. A. A. G. ABDUL QAYUM JAND
ZAKIAR BEGGUM (R/O BANDI) P/O B
TIROTE, TEH. ABBOTTABAD, ABBOTTABAD

001

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ACCOUNT NO: 000854-1

Current Account

BRANCH CODE/NAME: 0927-BEROTE BRANCH
REGION NAME: Abbottabad

DATE	DESCRIPTION INSTRUMENT	DEBIT AMOUNT	CREDIT AMOUNT	BALANCE
2015-07-01	BAL B/R			2,724,067.50
2015-07-29	TRANSFER 4000002		224927.00	2,948,994.50
	DR-SUM 231035.00	231035.00	CR-SUM 3180029.50	
	MIN-BAL 11102.50		MAX-BAL 2548994.50	
	MARKUP 00			

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P-17

Account Type: 22
Account No.: 0008541

Current Account:
P-T-A-A-C ABDUL QAYUM AND

Statement Date: 0001-01-

Value Posting Date	Date	Year	Tran.Type	Inst-No	Debit	Credit	Balance
Jan01	Jan01	15	BAL B/F			41102.50	41,102.5
Mar27	Mar27	15	Dr Vochr	4000005	35.00		41,067.5
Apr03	Apr03	15	TRANSFER	2000001		19000.00	60,067.5
Apr03	Apr03	15	TRANSFER	2020007		2715000.00	2,775,067.5
Apr08	Apr08	15	CASH	7770388	30000.00		2,745,067.5
Jun08	Jun08	15	CASH	7770389	200000.00		2,545,067.5
Jun08	Jun08	15	WITHTAX	47390389	1000.00		2,544,067.5
Jun18	Jun18	15	CASH	180000		180000.00	2,724,067.5

PgUp/PgDn

Bott
F12=Canc

NBP National Bank of Pakistan
CASH/ TRANSFER
PAY IN SLIP

DATE: 18-06-2015

Branch: **BEROTE BR. 0927** via **ATM** Account Type: PLS Saving Current Other

Title of Account: **PTC GGPS Randi Biote**

A/C No: **8541** Currency: PKR USD EURO GBP Others

Bank/Branch: (Drawee)	Cheque/Instrument No.	Denomination	Amount
		5000 x	
		1000 x	
		500 x	
		100 x	
		50 x	
		20000 x	
		180000	

Total Amount in Words: **One Hundred Eighty Thousand only** Total Amount: **180,000/-**

RECEIVED BY: **684874**
Cashier's Signature/with Stamp

St. No. **684874**

AUTHORISED OFFICER'S SIGNATURE

Depositor's Signature: **Abdullah**
Name: **Abdullah Kousar**
Contact No: **03624426071**

18 JUN 2015

Attested

National Bank of Pakistan
Account Statement

Account Title(s) M-T-A-C ABDUL QAYUM AND
NAGINA KAUSAR
Address: ZAKIA BEGGUM (R/O BANDI) P/O B
IROTE YE H ABBOTTABAD

Town:
District:
City: ABBOTABAD

Province/State: KH. PAKHTOON
Country: PAKISTAN
Product Name: PKR Current Account
Currency: PKR
CIF No: 5005099
Account No: 4072685704
IBAN: PK02NBPAD927004072685704

Handwritten: 5585

Postal Code:

Branch Code/Name: 027 Brote Branch

Region Name: Abbottabad

Statement of Account

Statement Printing Date: 10-Jul-2017

Handwritten: 854-1

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B/F Balance: 0.00

From: 01-Jan-2014

To: 10-Jul-2017

S. No.	Date	Particulars	Instno	Memor	Debit	Credit	Balance
1	28-May-2014	CASH	7770384	28	6,000.00	0.00	38,102.50
2	25-Jul-2014	CASH	7770385	25	14,000.00	0.00	22,102.50
3	08-Sep-2014	TRANSFER	2000002	08	0.00	19,000.00	41,102.50
4	27-Mar-2015	DR VOUCHER	4050005	27	35.00	0.00	41,067.50
5	03-Apr-2015	TRANSFER	2000001	03	0.00	19,000.00	60,067.50
6	03-Apr-2015	TRANSFER	2020007	03	0.00	2,715,000.00	2,775,067.50
7	03-Apr-2015	CASH	7770388	03	30,000.00	0.00	2,745,067.50
8	08-Jun-2015	CASH	7770389	08	200,000.00	0.00	2,545,067.50
9	08-Jun-2015	W.H.TAX	47390389	08	1,000.00	0.00	2,544,067.50
10	18-Jun-2015	CASH	160000	18	0.00	160,000.00	2,724,067.50
11	29-Jul-2015	TRANSFER	4000002	29	0.00	224,927.00	2,948,994.50
12	13-Oct-2015	CASH WITHDRAWAL	7770382		20,000.00	0.00	2,928,994.50
13	13-Oct-2015	CASH WITHDRAWAL	7770381		50,000.00	0.00	2,878,994.50
14	21-Oct-2015	CASH WITHDRAWAL	7770383		500,000.00	0.00	2,378,994.50
15	21-Oct-2015	WHT ON CASH WITHDRAL			3,000.00	0.00	2,375,994.50
16	12-Nov-2015	CASH WITHDRAWAL	7770384		500,000.00	0.00	1,875,994.50
17	12-Nov-2015	WHT ON CASH WITHDRAL			3,000.00	0.00	1,872,994.50
18	01-Dec-2015	CASH WITHDRAWAL	7770395		500,000.00	0.00	1,372,994.50
19	01-Dec-2015	WHT ON CASH WITHDRAL			3,000.00	0.00	1,369,994.50
20	23-Dec-2015	CASH WITHDRAWAL	7770386		200,000.00	0.00	1,169,994.50
21	23-Dec-2015	WHT ON CASH WITHDRAL			1,200.00	0.00	1,168,794.50
22	31-Dec-2015	CASH WITHDRAWAL	7770387		300,000.00	0.00	868,794.50
23	31-Dec-2015	WHT ON CASH WITHDRAL			1,000.00	0.00	868,094.50
24	10-Jan-2016	CASH WITHDRAWAL	7770388		400,000.00	0.00	468,094.50

This is a computer generated statement and does not require any signature

Page 1 of 2

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P-19

National Bank of Pakistan

Account Statement

Account Title(s) P-T-A-A-C ABDUL QAYUM AND
NAGINA KAUSAR
Address: ZAKIA BEGGUM (R/O BANDI) P/O B
JROTE TEH.ABBOTTABAD

Town:
District:
City:
Province/State:
Country:
Product Name: PKR Current Account
Currency:
CIF No: 5085099
Account No: 4072685704
IBAN:

Postal Code:

Branch Code/Name: 027 Jirote Branch
Region Name: Abbottabad

Statement of Account

Statement Printing Date: 10-Jul-2017

B/F Balance: 0.00

From: 01-Jan-2014

To: 10-Jul-2017

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
25	19-Jan-2016	WHT ON CASH WITHDR			3,210.00	0.00	328,784.50
26	21-Jan-2016	DEPOSIT			0.00	120,000.00	448,784.50
27	28-Apr-2016	CASH DEPOSIT			0.00	110,000.00	558,784.50
28	28-Apr-2016	CASH DEPOSIT			0.00	110,000.00	668,784.50
29	28-Apr-2016	CASH DEPOSIT(Reversal)			0.00	(110,000.00)	558,784.50
30	28-Apr-2016	CASH DEPOSIT(Reversal)			0.00	(110,000.00)	448,784.50
31	28-Apr-2016	CASH DEPOSIT			0.00	110,000.00	558,784.50
32	01-Aug-2016	TRANSFER			0.00	33,000.00	591,784.50
33	13-Mar-2017	CASH WITHDRAWAL	63525552		50,000.00	0.00	541,784.50
34	22-Mar-2017	CASH WITHDRAWAL	63525553		50,000.00	0.00	491,784.50
35	27-Mar-2017	CASH WITHDRAWAL	63525554		50,000.00	0.00	441,784.50
36	03-Apr-2017	CASH WITHDRAWAL	63525555		50,000.00	0.00	391,784.50
37	08-Apr-2017	CASH WITHDRAWAL	63525556		50,000.00	0.00	341,784.50
38	10-Apr-2017	CASH WITHDRAWAL	63525557		50,000.00	0.00	291,784.50
39	13-Apr-2017	CASH WITHDRAWAL	63525558		50,000.00	0.00	241,784.50
40	17-Apr-2017	CASH WITHDRAWAL	63525559		50,000.00	0.00	191,784.50
41	20-Apr-2017	CASH WITHDRAWAL	63525560		50,000.00	0.00	141,784.50
42	27-Apr-2017	CASH WITHDRAWAL	63525561		50,000.00	0.00	91,784.50
43	02-May-2017	CASH WITHDRAWAL	63525562		50,000.00	0.00	41,784.50
44	11-May-2017	CASH WITHDRAWAL	63525563		40,000.00	0.00	1,784.50

Total 10 Credit transactions of amount: 3,420,027.00

Total 32 Debit transactions of amount: 3,461,245.00

This is a computer generated statement and does not require any signature

Page 2 of 2

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M

تاریخ: 13/10/2023 - 0822930

ہستیہ الحمان و لادنہ خیراتی



ATTESTED

ہستیہ الحمان و لادنہ خیراتی کے ذریعے ہستیہ الحمان و لادنہ خیراتی کے نام سے

ہستیہ الحمان و لادنہ خیراتی کے نام سے

ہستیہ الحمان و لادنہ خیراتی کے نام سے ہستیہ الحمان و لادنہ خیراتی کے نام سے

Handwritten signature/initials.

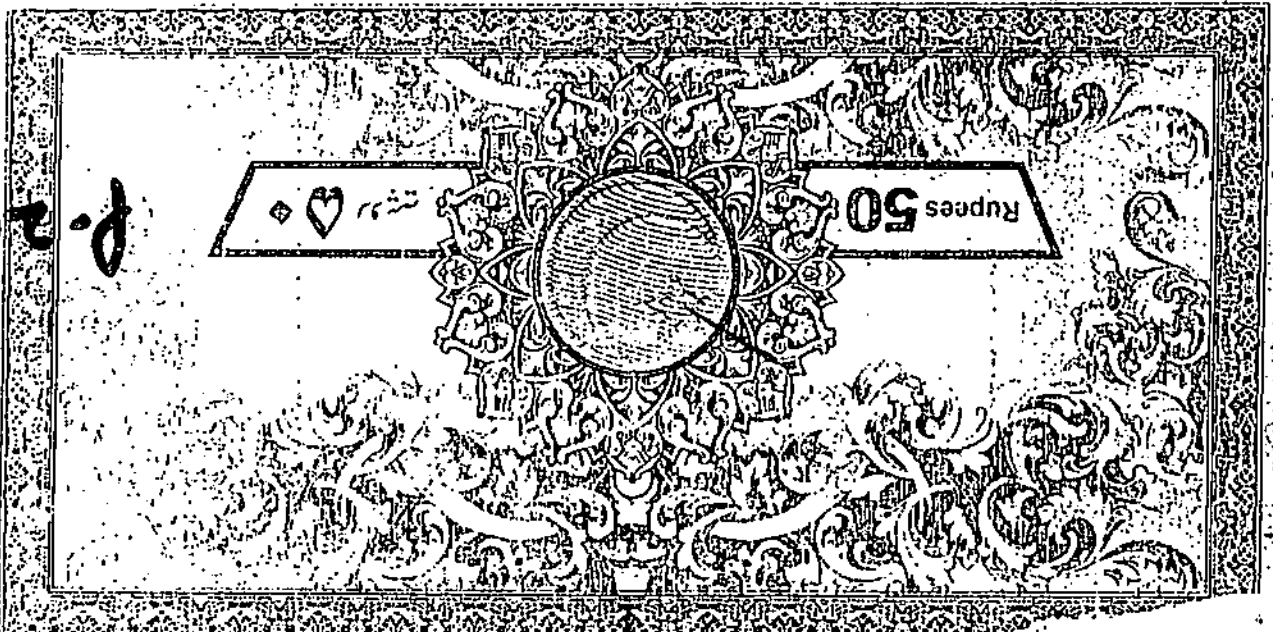
1	200000	16,00,000	ہستیہ الحمان و لادنہ خیراتی
2	3,20,000	3,20,000	ہستیہ الحمان و لادنہ خیراتی
3	3,77,000	3,77,000	ہستیہ الحمان و لادنہ خیراتی
4	2,00,000	2,00,000	ہستیہ الحمان و لادنہ خیراتی
5	8356	8356	ہستیہ الحمان و لادنہ خیراتی
6	24,77,000	24,77,000	ہستیہ الحمان و لادنہ خیراتی

ہستیہ الحمان و لادنہ خیراتی کے نام سے ہستیہ الحمان و لادنہ خیراتی کے نام سے

ہستیہ الحمان و لادنہ خیراتی کے نام سے

ہستیہ الحمان و لادنہ خیراتی کے نام سے ہستیہ الحمان و لادنہ خیراتی کے نام سے

ہستیہ الحمان و لادنہ خیراتی کے نام سے



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Handwritten text 'Annex B C'.

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3/24/24 (1st)

Handwritten notes in Urdu script, including the word "Perenka" and some numbers.

Handwritten notes in Urdu script, including the number "18-9927".

Handwritten notes in Urdu script, including the number "558785" and the word "Perenka".

Handwritten notes in Urdu script, including the number "29.3992/3992".

Handwritten notes in Urdu script.

Handwritten notes in Urdu script.

Handwritten notes in Urdu script.

P-21-A

Handwritten notes in Urdu script at the bottom of the page.

Annex-D

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 767-70
Dated: 7/4/2016

P-21

SUSPENSION / MIS-APPROPRIATION OF CONSTRUCTIONAL FUNDS

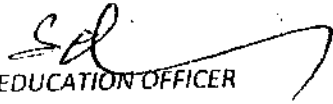
Consequent upon the inspection/physical verification report of committee ordered by the worthy DEO (F) Abbottabad dated.28-03-2016 consisted on ADO Birote, Mr.M.Hafeez Office Asstt. and technocrate of JBDW, Abbottabad regarding the constructional work done by PTC GGPS. Bandi Birote,

Mst:Asfana Kousar PSHT GGPS Bandi Birote is her by suspended from service with immediate effect having point out the various negligence's/miss-appropriations occurred during the said construction.

Moreover according to technocrate report the total estimate of the said construction made by PTC GGPS. Bandi Birote is Rs.1130000/- where as she has been showing a huge amount of Expenditure Rupees 2939927/- and project is only Sixty % Completed.

The exaggerated amount i.e. Rs.1809927/- according to the Technocrate report should be refunded to PTC Fund under intimation to this office.

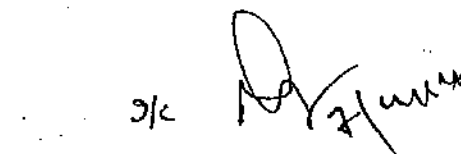
Mst:Asia Bibi Pst GGPS. Birote is hereby ordered to complete the remaining constructional work of the building under her supervision and also lock after the school affairs.


DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Endst: No. 767-70 /Dated. 7/4 /2016

COPY TO THE

01. Sub Divisional Education Officer (Female) Abbottabad.
02. District Account Abbottabad
03. ADEO Birote Circle Abbottabad
04. GGPS. Bandi Birote Abbottabad


DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

No. 1532 / 2021

Dated: 16/06/2021

0912-310536
eoffice@tebheltdc.gov.in

P.22



OFFICE ORDER

Mrs. Alsuma Kousar, PSHT, Govt. Girls Primary School, Bandi Hrore, Circle
there is hereby directed to perform duties as incharge of the school being PSIT and Aisl. Asst
Main Pst of this school will remain the incharge/Secretary of PTC funds in the interest of public
service with immediate effect.

NOTE

1. Charge report should be submitted to all concerned.
2. No TADA is allowed.

Sd/-

Sub-Divisional Education Officer
(Female) Abbotabad

Dated 18/06/2021

Encl. No. _____
Bhrole

Copy for information & compliance to:-

1. The District Education Officer (Female) Abbotabad.
2. The District Account Officer Abbotabad.
3. The ASDEO Concerned.
- 4-5 Teachers Concerned.

Sub-Divisional Education Officer
(Female) Abbotabad

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر زمانہ مدارس ایبٹ آباد۔

جناب عالیہ: ۲۰۲۳

مودبانہ گزارش ہے کہ اہلیان علاقہ بانڈی بیروٹ، PTC ممبران چمر پرسن، بیکریٹری، جنابہ سے گزارش

کرتے ہیں کہ گورنمنٹ گراڈ پرائمری سکول بانڈی بیروٹ EMIS CODE 10950 جو کہ پی۔ٹی۔ پی۔نڈز سے مبلغ
(3000000/-) تیس لاکھ سے دو عدد کمرے، دو عدد باتھ رومز، ایک عدد سٹور، پانی اور بجلی سال 2020 میں تکمیل کے بعد بچوں کو اس
سکول میں شفٹ کیا گیا۔ یہ سکول خسرہ نمبر 3464 دو کنال رقبہ پر مشتمل ہے۔

اسی سکول کے نام چھ کمروں پر مشتمل GGPS بانڈی بیروٹ محلہ سراں بانڈی ایک نئی بلڈنگ بنائی گئی ہے جو مکمل ہو چکی ہے جو
دوسری اصل بلڈنگ سے کافی فاصلہ پر ہے اور چھوٹے بچوں کا اس نئی بلڈنگ میں جانا انتہائی مشکل ہے۔

لہذا جنابہ سے گزارش ہے کہ اس نئی بلڈنگ کو NON DEVELOPMENTAL پالیسی کے تحت ڈیل کا درجہ دیا جائے

، اس کے ساتھ آنے والے پرائمری سکولز (GGPS Bandi Birote, GPS Bandi Birote,

GGPS Julial, GPS Julial, GPS Gala) کی کلاس دائرہ تعداد بھی ساتھ منسلک کی جاتی ہے۔ جبکہ اس ویج

کونسل جلیال، گلہ، بانڈی میں کوئی ڈیل سکول نہیں ہے۔

امید ہے ہماری درخواست پر ہمدردانہ غور فرماتے ہوئے ضروری کارروائی عمل میں لائی جائے گی۔

العارض

اہلیان علاقہ بانڈی بیروٹ و سراں بانڈی

ویج کونسل جلیال، گلہ، بانڈی

نام شہزادہ سہیلی ضربی کرنل
۷/۴ جلیال بانڈی، ۳۱
تھانہ ۵۳۱۵ ۸۵۳۳

Heirs,

P. 24

- 1.
- 2.
- 3.

Verification Roll No. dated received back

Attended

Left thumb-impression.

MM

Handwritten signature/initials in Urdu script.

Qualification Date

Qualifications Date

① Passed SSC examination English the board of ISE Peshawar under Roll Pashtu No 16374 and she obtained 515 marks out of Urdu SSC and has been placed in grade B

Passed F.P. Exam from First P.A.S.E. Rawal Pindi Session (A) 1995 under Rno. 522332 B. A. or B. A. Obtaining 452 Marks of 1100
 Photograph submitted on 21-10-95
 duty verified vide No. 55 dt: 8-5-03

- 7
- 8

Plan-drawing:

Training School Hajal examination

② Passed P.T.C. from Hijama Finger print taken from Ajeel Hakeemate Riyasate Jam. Kashmit Drill instructing Muzaffarabad under Roll No 101 and she Court duties obtained 568 marks out of 1300 session 1992

Other qualifications -
 Passed C.T. Exams from A.I.O.U. Islamabad as Private candidate under Q.No F-6317061 obtaining 56% II div on 10.7.1998
 duty verified.

- 9
- 10

Reserve duties
 Divisional Education Officer
 (Abbottabad)

Signature
 Bq. Divisional Education Officer
 (Abbottabad) Abbottabad.

N. B.—Line to be drawn under the qualification possessed.

Note—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name Afsana Kousali

2. Race Hind

P-25

3. Residence: Moh. Julhal

4. Father's name and residence Moh. Rashid of Julhal

5. Date of birth by Christian era as nearly as can be ascertained 22-2-72 twenty second Feb

Seventy two

6. Exact height by measurement 5-4

Date
9/2/00

7. Personal marks for identification

[Handwritten signature]

7/0/01

8. Left hand thumb and Finger impression of (non-gazetted) officer



3/3/02

2/1/00

Little Finger.



Ring Finger



[Handwritten signature]

Middle Finger:



Fore Finger



Thumb.



9/5/03

1/0/01

in

9. Signature of Government servant.

[Handwritten signature in Urdu]

Sub Divisional Education Officer
(Female) Abbottabad

?

1/2/00

NO

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

[Handwritten signature]

1/2/00

at

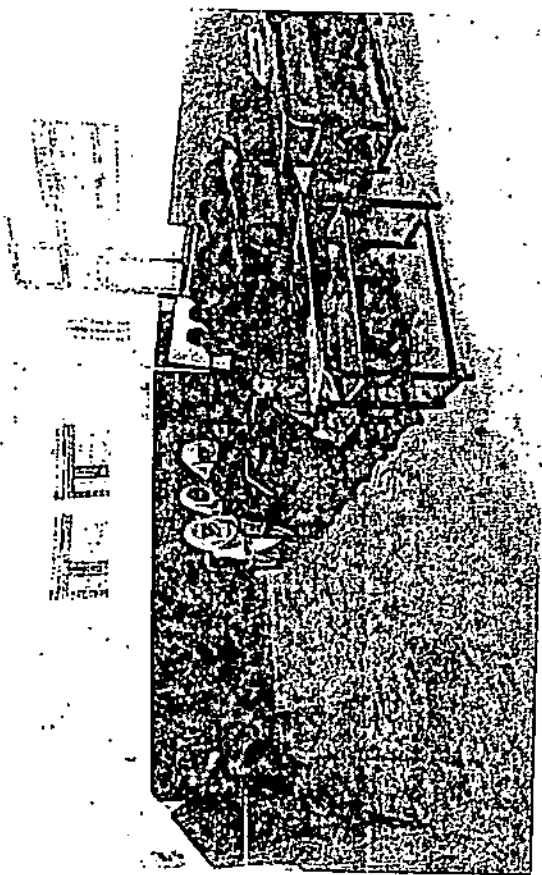
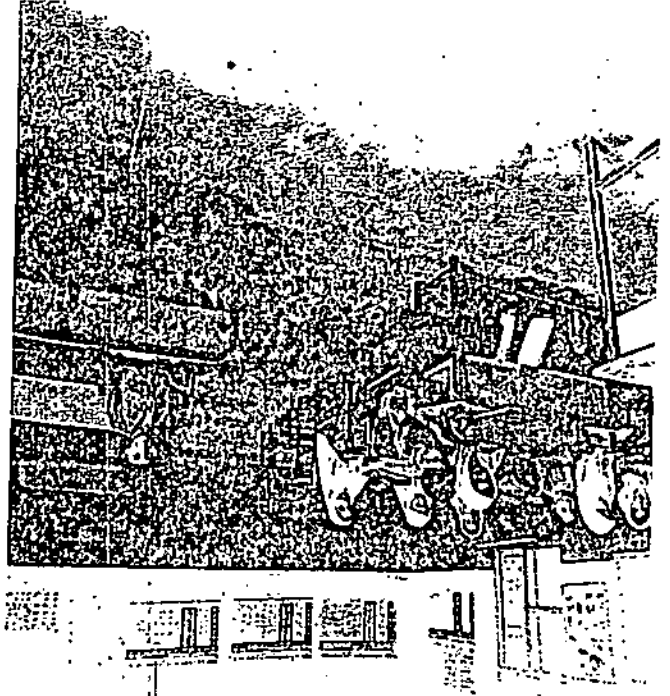
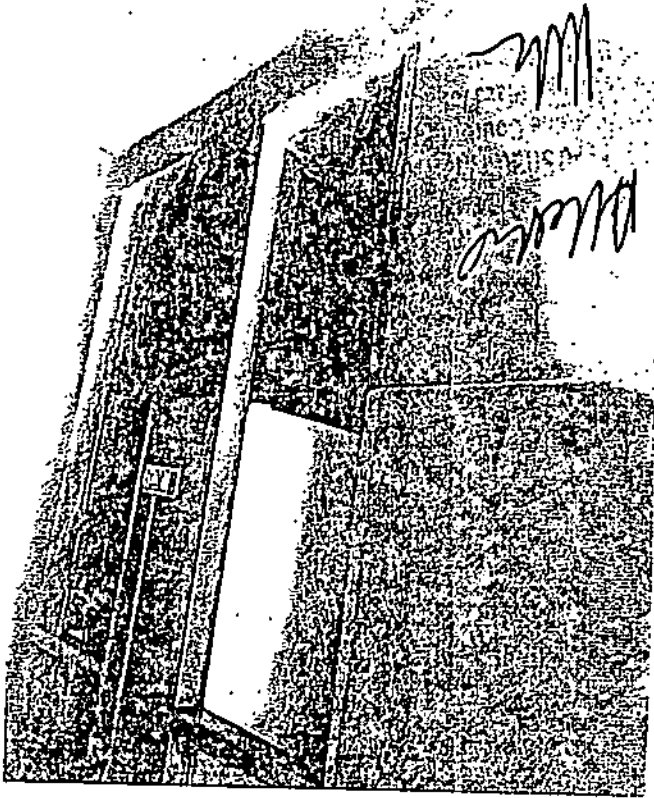
6/0

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of column 1 to 4	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	Period	Government to which debitable	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.
S.D.E.O. (F) Abbottabad			S.D.E.O. (F) Abbottabad			87 7/4/14	
S.D.E.O. (F) Abbottabad	30/11/13	ATD	S.D.E.O. (F) Abbottabad			Drawn in rear of Pay + Allowances 3 w.e.f. 1-10-07 to 4-3-13 31/14	
S.D.E.O. (F) Abbottabad	30/14	ATD	S.D.E.O. (F) Abbottabad			Due to allowed B.P.S. 1251/15 amounting to Rs. 26837/26319	
S.D.E.O. (F) Abbottabad	30/15	SR	S.D.E.O. (F) Abbottabad			Pay Actm 15500/2 14 9-4-14.	DAO ATD
S.D.E.O. (F) Abbottabad	30/15	ATD	S.D.E.O. (F) Abbottabad			Service Verified from 1-12-2011 to 30-11-13 from Acq. Rolls and other records of this office.	
S.D.E.O. (F) Abbottabad	30/16	SR	S.D.E.O. (F) Abbottabad			S.D.E.O. (F) Abbottabad	
Suspended from the Service with immediate effect, i.e. ref 767-70 A 7-4-2016 vide D.O. (F) Abbottabad Encls No-767-70 A 7-4-2016						5308 10/11/14 pay Actm 16200/2 1-12-14.	DAO
Sub-Divisional Education Officer (F) Abbottabad							

031

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p-22

کورٹ فیس

وکالت نامہ

Service Tribunal UPK Peshawar بعد الدت

Alfana Iqbal عنوان: Gov & Serv

Appellant منجانب

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دی کل کاروائی متعلقہ آن مقام

Muhammad Arshad Khan Tanoli Asst

کام کو وکیل مقرر کر کے اتر کرنا ہوں کہ صاحب موصوف کی کل کاروائی کا کمال اختیار ہوگا پیر وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد

استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المقوم:

مقام: Abellaba

~~Abellaba~~

Abraham Iqbal
A. I. C. A. I. A.

~~Abellaba~~

Muhammad Arshad Khan
Tanoli Sec or Peshawar