


FORM OF ORDER SHEET

Court of _____

Appeal No. 758/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/06/2024	<p>The appeal of Mst. Rifat Begum resubmitted today by Mr. Umar Farooq Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 10.06.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>



The appeal of Mst. Rifat Begum received today i.e on 30.05.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.

- 1- The authority to whom the departmental appeal was made has not been made/arrayed a necessary party.
- 2- Copy of departmental appeal is unsigned.
- 3- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 106 /Inst;/2024/KPST,

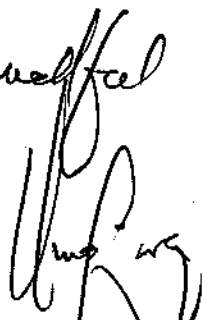
Dt. 31/05 /2024.


31/5/24
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Umar Farooq Mohmand Adv.
High Court Peshawar.

R/Sir,

- 1) In response to objection 1 requisit has already been done.
 - 2) In resp: to obj: 2. the same is signed and has been properly intimated by the authority
 - 3) The need ful has been done.
- > Re. Submitted after doing wellful


05 06 2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

NO. _____/2024

Mst. Raza Begum

VS GOVT. OF KPK & OTHERS

APPLICATION FOR FIXATION OF THE ABOVE TITLED *Appeal* AT
PRINCIPAL SEAT, PESHAWAR

Respectfully Sheweth:

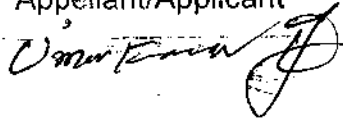
1. That the above mentioned _____ is pending adjudication before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974, a Tribunal may hold its sittings at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning that the offices of all the respondents concerned are at Peshawar and Peshawar is also convenient to the appellant/applicant meaning thereby that Principal Seat would be convenient to the parties concerned.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble tribunal.

It is therefore prayed that on acceptance of this application the _____ may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Dated: 30/5/2024

Through

Appellant/Applicant



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 758 /2024

Mst: Rifat Begum.....APPELLANT


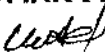
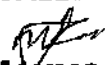
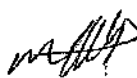
VERSUS

The Edu: Deptt:RESPONDENT

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S. NO	DOCUMENTS	ANNEX	PAGE
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2.	Copy of appointment order	A	5-6
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4.	Copy of the attendance register	E	10-17
5.	Copy of the impugned termination order dated 20/02/2023	F	18
6.	Copy of departmental appeal	G	19
7.	Copies of application, departmental inquiry and other relevant documents	H-J	20-24
8.	Vakalat Nama	-	

Dated:

Through: ^{APPELLANT}

UMAR FAROOQ MOHMAND

WALEED ADNAN

MAHMOOD JAN
&

MUHAMMAD AYUB

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 758 / 2024

Mst: Rifat Begum Ex.PST
IHC Khar District Bajour

.....APPELLANT

VERSUS

1. The Director Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer District Bajour.

.....RESPONDENT

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
APPELLATE ORDER DATED 20/02/2023 WHEREBY THE
APPELLANT HAS BEEN TERMINATED FROM THE SERVICE
AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL
APPEAL WITHIN 90 DAYS.**

PRAYER:

That on acceptance of this appeal, the impugned order dated 20/02/2023 may kindly be set aside and the appellant may kindly be reinstated into service with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:-

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

- 1- That the respondent department advertised various posts including the post of PST (BPS-12), whereby the appellant eligible in all respects, applied to the said post and after fulfilling

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2024

Mst. Rifat Begum Ex.PST

IHC Khar District Bajour

.....Appellant

VERSUS

1. The Secretary Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer District Bajour.

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE IMPUGNED APPELLATE ORDER DATED 20/02/2023 WHEREBY THE APPELLATE HAS BEEN TERMINATED FROM THE SERVICE AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL WITHIN 90 DAYS.

PRAYER:-

That on acceptance of this appeal, the impugned order dated 20/02/2023 may kindly be set aside and the appellant may kindly be reinstated into service with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/Sheweth,

On FACTS:

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

1. That the respondent department advertised various posts including the post of PST (BPS-12), whereby the appellant eligible in all respects, applied to the said post and after fulfilling

all the codal and legal formalities and on the recommendation of Departmental Selection Committee, the appellant was appointed as PST (BPS-12) vide order dated 27/04/2022. Copy of appointment order is attached as annexure.....A

2- That the appellant after appointment provide medical certificate to the respondent, submit her charge report against the post of PST at IHC GGPS Khar and started performing her duties quite efficiently and with the entire satisfaction of her superior. Copies of medical certificate, charge report and arrival report are attached as annexure.....B,C&D

3- That the appellant after assuming charge of the said post, performing her duties quite efficiently and to the entire satisfaction of her high-ups and no complaint whatsoever made against the appellant. Copy of the attendance register is attached as annexure.....E

4- That the appellant while performing her duty with zeal and zest, the respondent department astonishingly issued the impugned termination order dated 20/02/2023 without any reason and justification and fulfilling requisite rules. Copy of the impugned termination order dated 20/02/2023 is attached as annexure.....F

5- That feeling aggrieved from the impugned termination order dated 20/02/2023 the appellant filed a departmental appeal to the appellate authority i.e. respondent No 1. Copy of departmental appeal is attached as annexure.....G

6- That upon departmental appeal of the appellant, the respondent department through notification dated 14/07/2023 appointed an inquiry officer and conducted an inquiry in the matter, but the appellant neither associated with the inquiry nor provide any documents related to the inquiry, where-after the appellant moved an application to the respondent to provide the copies of departmental inquiry and accordingly the inquiry notification and other documents were provided to the appellant. Copies of application, departmental inquiry and other relevant documents are attached as annexure.....H,I& J

7- That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds inter alia:-

GROUND:

- A- That the impugned termination order dated 20/02/2023 is against the law and facts of the case.
- B- That the impugned termination order dated 20/02/2023 is erroneous and not sustainable in the eye of law.
- C- That the impugned termination order dated 20/02/2023 is result of illegalities and irregularities, which resulted in into grave miscarriage of justice.
- D- That the impugned termination order dated 20/02/2023 is result of misreading and non-reading of material available on record.
- E- That the impugned termination order dated 20/02/2023 is has been passed in a post haste and arbitrary manner.
- F- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- G- That the action of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.
- H- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for re-instatement.
- I- That no show cause notice has been issued before issuing the impugned termination order dated 20/02/2023.
- J- That no chance of personal hearing/defense has been provided to the appellant before issuing the impugned order.

- K- That impugned termination order dated 20/02/2023 issued by the respondents in arbitrary and mala fide manner, therefore, the same is not tenable in the eye of law and liable to be struck down.
- L- That no regular inquiry has been conducted before issuing the impugned termination order dated 20/02/2023.
- M- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: _____

Through: *Rifhat*
APPELLANT

[Signature]
UMAR FAROOQ MOHMAND

[Signature]
WALEED ADNAN

[Signature]
MAHMOOD JAN
 &

[Signature]
MUHAMMAD AYUB
 ADVOCATES HIGH COURT

AFFIDAVIT

I, Mst: Rifat Begum Ex.PST, IHC Khar District Bajour, do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

DEPONENT
Rifhat



13 0 MAY 2024



A. 5

**-District Education Office
Bajaur at Khar**

Email aeobajaur@gmail.com

Voice & Fax +92942220395

APPOINTMENT ORDER

Consequent upon the advertisement bearing No. INF(P)4201/20 and recommendations of the departmental selection committee, the following female candidates of District Bajaur are hereby appointed/adjusted on adhoc/contract basis purely on merit against the vacant posts of **Primary School Teacher (PST) Tehsil Khar** in the schools noted against their names in **BPS-12 (13320-960-42120) @ Rs.13320/- fixed** plus usual allowances as admissible under the rules as per existing policy of the provincial government in teaching cadre on the terms and conditions as given below with immediate effect in the best interest of public service.

S #	Roll No	Name	Father Name	ETEA Marks	Total Marks	Place of Posting
1.	455389	Safia Bibi	Malang Jan	73	108.58	GGPS Sheramin Korona
2.	462232	Sania Khan	Sher Mohammad	61	103.99	GGPS Lal Gul Banda
3.	460828	Shumaila	Fazali Rabbi	45	103.18	GGPS Ghafoor Shah
4.	455394	Habiba Sara	Muhammad Jan	55	96.71	GGPS Rashakai
5.	455107	Zakia Bibi	Hamid Ullah	43	94.91	GGPS Zoorbandar
6.	455150	Rifat Begum	Muhammadi Shah	44	94.01	IHC Khar
7.	455303	Bushra	Said Ghulam	43	92.36	GGPS Loisam
8.	462262	Rukshanda Begum	Hayat Muhammad	56	91.07	GGPS Bhai China

TERMS AND CONDITIONS:

1. The appointment is purely made on temporary /Adhoc basis initially for a period of one year with effect from 28-04-2022 to 27-04-2023.
2. Charge report should be submitted to all concerned.
3. Medical certificate should be produced to this office obtained from Medical Superintendent Bajaur.
4. All academic / professional documents, domiciles will be verified from the concerned authorities and if found bogus / fake at any stage, their services will be considered as terminated from the date of appointment against the said post.
5. They will receive nine (09) months in-service mandatory professional training arranged by PITE/GECT.
6. Posting / adjustment on the advertised/available vacancies is the discretionary powers of the appointing authority and no one has the right to claim for adjustment at a specific school.
7. They will governed such rules and regulation as may issue from time to time by the government.

ATTESTED

6

- their pay shall not be drawn unless this office issues a certificate to the effect that their documents have been verified and duty certificate from concerned Principal / Head Master / Head Mistress / ADEO.
9. Their services shall be terminated at any time in case of misconduct and they shall be proceeded against under the relevant rules issued from time to time.
 10. Errors and omission will be accepted for further rectification within the specified period.
 11. Appointees already serving as regular / contract employees shall tender resignation from their previous service before joining the present post.
 12. They should join their post within 15 days of the first date of his contract i.e. 28th April 2022. In case of failure, his appointment shall automatically stand expired and no subsequent appeal etc shall be entertained.
 13. In case of regularization their inter-se-seniority shall be determined on the basis of their merit position and the date of taking over charge shall not affect their inter-se-seniority.
 14. If any candidate in the order of merit is deprived of appointment by this order, the appointment order of the lowest candidate in the merit at that specific order shall be withdrawn on acceptance of the appeal and adjustment order will be reviewed accordingly as per merit.
 15. Their appointment is school based, they will have to serve at the place of posting in their service is not transferrable to any other station.
 16. Drawing & disbursing Officer should personally verify this order from the office of the District Education Officer Bajaur before handing over charge to the officials.

Note: No TA/DA is allowed.

(Shireen Zada)
District Education Officer
Bajaur
Dated 27/04/2022

Endst: No. 721-28
Copy forwarded to: -

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Section Officer Schools (Primary) E&SE Education Department
3. District Accounts Officer Bajaur.
4. DMO EMA Bajaur.
5. Principals / Head Masters concerned.
6. Assistant District Education Officer concerned.
7. Accountant / pay clerk of the local office.
8. Focal Person IEMIS.
9. Officials concerned.


District Education Officer
Bajaur

ATTESTED

MEDICAL CERTIFICATE

S.No. _____

Name of Official.....Rifat Begum

Cast or race..... Muslim/ Pakistani.....

Father's H/ name Muhammadi Shah

Residence Village Khar Tehsil Khar District Bajaur

Date of birth 12/07/1992.....

Exact height by measurement.....5-5"

Personal mark of identification.....

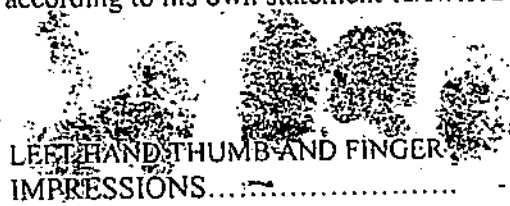
Signature of the Official *Rifat*

Signature of head of office.....

Seal of Office.....

I do hereby certify that I have examined Rifat Begum candidate for employment in the Office of the District Education officer Bajaur and cannot discover that he /She had any disease communicable or other constitutional affection or bodily infirmity except.....I do not consider this as disqualification for employment in the office of the.....As above...His/her age is according to his own statement 12/07/1992 years and by appearance about 12/07/1992 years

LEFT HAND THUMB AND FINGER IMPRESSIONS.....



[Signature]
 Medical Superintendent
 DHQ Hospital.....

MEDICAL SUPERINTENDENT
 DHQ Hospital Khar 09/05/2021
 Bajaur

Printed by Babbar Hussain


ATTESTED *[Signature]*

17

C-8


CHARGE REPORT.

I Miss Rifat Begum PST BPS-1 took over charge of my duties today on 28/04/2022 (F.Noon) at IHC Bhai Khan Shah Tribal District, Bajaur vide District Education Officer, Bajaur Endost:In compliance with the Deputy Commissioner, Bajaur Order/ Endst: No.881-82/DEO/Female dated 12/05/2022 positively.


Rifat Begum PST BPS-12
IHC District, Bajaur

Head Mister
GGPS, Bhai Khan Shah

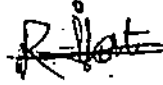

HEAD MISTRESS
G.G.P.S Bai Khan Shah
District Bajaur


ATTESTED

D. 9

ARRIVAL REPORT

I Mst: Refat Begum PST (IHC) do hereby report of my arrival / duties today on 28/04/2022 (FN) to the IHC GGPS Khar District Bajaur vide Appointment order issued by District Education Officer Bajaur Endst: No. 721-28 Dated 27/04/2022.




Mst. Refat Begum PST
IHC GGPS Khar Bajaur

Dated 28/04/2022



10/05/2022
ASSISTANT EDUCATION OFFICER
DISTRICT BAJAUR

ATTESTED 

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مال	سبت	پنجشنبہ	جمعہ	اتوار	پہلے	دو	تیس

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"	"	R.B 1:30	R.B 8:30	Q.H 1:30	Q.H 8:30	S. 1:30	S. 8:30	18:30	18:30
			R.B 8:30				S. 8:30		

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OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KHAR DISTRICT BAJAUR

(F) (18)

TERMINATION ORDER.

The appointment order issued vide this office Endost: No. 721-28 dated 27/4/2022 in respect of Miss: Rifat Begum PST Tehsil Khar is here by terminated due to providing fake documents from the date of issuance in the interest of public service.

(Mehr-un-Nisa)
District Education Officer Female
District Bajaur.

Endost: 907-12 DEO/Khar Bajaur

Dated. 20/12/2023

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Section Officer Schools (Primary) E&SED Khyber Pakhtunkhwa Peshawar.
3. District Accounts Officer Bajaur.
4. DMO EMA Bajaur
5. ASDEO Concerned.
6. Accountant of the local office


District Education Officer Female
District Bajaur.

ATTESTED

15, 19
To,

The Sectary,

Education Peshawar

Subject:- **DEPARTMENT APPEAL, REPRESENTATION**

Respected sir,

With due respect, the appellant submits the departmental appeal against the impugned order No. 907-12/DEO/ Khar Bajour dated 20-02-2023 of the distt. Education officer (female) district Bajaur as under;

1. That the applicant is belong to a respectable family of district Bajaur and have passed her master degree in political science 01-12-2021
2. That 55 posts of Pst ware advertised in this district Bajaur, where only 46 candidates qualified the EATA test. The applicant obtained 44/100 marks.
3. That therefore a merit list was prepared and the was appointed as Pst teacher in HC Khar vide order No 721-28 dated 27-04-2022. That the applicant was posted to GGPS bhai khan shah through corrigendum vide no 881-28 dated 12-05-2022
4. That the applicant served the department with full devotion and dedication without any complaint w.e.f 28-04-2022 till 20-02-2023 for about 8 months. it is pertinent to mention that no salary was paid to applicant
5. That the DEO (female)Distt Bajaur without any inquiry on a flimsy and false allegation of terminated the services of the applicant vide impugned order No. 907-12/ DEO/ Khar Bajaur dated 20-02-2023.
6. That the applicant has nit submitted any fake documents nor obtained any benefit of the alleged fake documents.
7. That the impugned order is illegal, against the law, fact of the case and norm of natural justice, therefore, the same is not sustainable in the eye of law and liable to set-aside.
8. That the DEO (f) has nit followed proper procedure and terminated the applicant without granting proper opportunity of hearing and thus applicant is condemned unheard.

It is therefore prayed that on acceptance of this departmental appeal/representation the impugned order no 907-12/DEO/Khar Bajaur may set aside and the applicant be re-instated in her position as Pst GGPS Bhai khan shah with all back benefits

ATTESTED

Your's faithfully

REFAT BEGUM

Dated 15-03-2023

پست پٹری (Handwritten)

12/11/2014

ATTESTED

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(H) 28



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Child Secretariat, Peshawar

Phone No 091-9223310

Dated 11/07/2023

NOTIFICATION

No. Gen/SO(Comp)E&SED/1-18/2023/Mst. Rifat Begum, Ex-PST, The Competent Authority Mohmand to nominate Mst. Zubaida Hanif, Deputy District Education Officer (Female) Mohmand to conduct fact finding inquiry into the complaint received to this department regarding "misuse of power and embezzlement in recruitment process in respect of Mst. Rifat Begum, Ex-PST District Bajaur".

The concerned officer shall submit its report to the High Ups within (15 days) positively.

**SECRETARY
E & S EDUCATION DEPTT:**

Encl: as above


Endst: of even number & date:

Copy of the above is forwarded to the:

M.
23

1. Mst. Zubaida Hanif, Deputy District Education Officer (Female) Mohmand (A copy of complaint enclosed along-with its enclosures).
2. The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. District Education-Officer (Male/Female) District Bajaur with the request to assist the Inquiry Officer and provide the relevant record.
4. Section Officers (Primary/Female, Enquiry), E&SE Department.
5. PS to Secretary, E&SE Department.
6. PA to Additional Secretary, (Monitoring) E&SE Department.
7. PA to Deputy Secretary (Monitoring), E&SE Department.

COM.
14.7.23


SECTION OFFICER (COMPLAINTS)

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ATTESTEL



22

MEMORANDUM
 To

Mst. Zubaida Hanif,
 District Education Officer (Female),
 District Mohmand.

Subject: DEPARTMENTAL APPEAL REPRESENTATION.

I am directed to refer the subject cited above and to state that you a nominated as Inquiry officer for fact finding inquiry on the complaint received to the department regarding "misuse of power and embezzlement in recruitment process respect of Mst. Rifat Begum, Ex-PST District Bajaur".

It is further added that this section issued a Notification of Even No. Da 14.07.2023 (copy enclosed) on the subject noted above and to state that the Inq Report in the instant case is still awaited after lapse of 04 months.

You are, therefore, requested to conduct a fact finding inquiry as directed by the Competent Authority and submit report accordingly.

[Signature] 16/11
 SECTION OFFICER (COMPLAIN)

Endst: of even number & date:

Copy of the above is forwarded to the:

1. District Education Officers (Male/Female), District Bajaur with the request to provide the relevant record to the Inquiry Officer.
2. PA to Additional Secretary (Monitoring), E&SE Department
3. PA to Deputy Secretary (Monitoring), E&SE Department.

[Signature] 16/11
 SECTION OFFICE (COMPLAIN)

AT STEU



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE
MOHMAND TRIBAL DISTRICT

Ph. No. : 0924290302

FAX : 0924290302



17
23

No. 5141/

Date: 11/12/2023/

To

The Secretary Education,
KPK Peshawar.

Subject: INQUIRY REPORT AGAINST DEO FEMALE DISTRICT BAJOUR ON THE
COMPLAINT OF MST: RIFAT BEGUM EX-PST.

Memo:


Proceedings.

As per directions received vide Notification No. Gen/SO (Comp) E & SED/1-18/2023/Mst: Rifat Begum Ex-PST dated 14/07/2023 wherein the undersign was nominated as inquiry officer (ANNEXURE "A") with the above-mentioned letter a complain/ Departmental appeal was also received which was submitted by the complainant Mst: Rifat Begum ex- PST. (Annexure "B").

In order to probe into the matter, I, the undersigned along with clerks of my office visited to the office of DEO female Bajour at khar on _____ and collected relevant documents/ record regarding appointment to PST B-12 teachers.

The following record was collected from DEO female Bajour.

1. Final Tehsil wise merit lists of PST B-12 posts. (ANNEXURE "C")
2. Minutes of PST candidates all Tehsils. (ANNEXURE "D")
3. Appointment orders of PST candidates Tehsil wise (ANNEXURE "E")
4. All academic documents in R/O Mst: Rifat Begum EX-PST (ANNEXURE "F")
5. Verification letter received by Kohat University regarding fake Master of Arts in R/O Mst: Rifat Begum. (ANNEXURE "G")
6. Termination order (ANNEXURE "H")


District Education Officer
Mohmand
3/01/2024

Dated 15-03-2023

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ATTESTED

In this regard on 30/11/2023 the undersigned called a meeting of the following members to discuss the case.

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1. Mst. Zubaida Haneef DEO female Mohmand (Chairman)
2. Mr. Habib Said Bacha S/Clerk (Dealing assistant recruitment)
3. Mr. Waheed Ullah S/Clerk (Dealing assistant Establishment)
4. Mr. Jehangir J/Clerk.

CONCLUSION/ RECOMMENDATION.

According to rules regulations and after the scrutiny of all documents/ record regarding recruitment of PST candidates we found some lake of documents in the record, for example the DEO Bajour has not been processed the proper working papers for the said task. They shared/displayed only one tentative merit list and considered the second merit list as Final merit list. However according to the relevant record, the DEO Bajour have made the PST appointment with transparent manner. The DEO has been appointed Mst. Rifat Begum according to Tehsil wise merit list at S.No 06 of the appointment order in Tehsil Khar Bajour, but later on, when the M.A Degree of the concerned candidate come fake from the Kohat University then the DEO terminated her services due to fake document which is the part of recruitment proceedings.

Furthermore, the complaint of the complainant is baseless and her services has been terminated according to rules-regulations and to the appointment criteria please.

(Signature)
 (Zubaida Haneef)
 District Education Officer female
 Mohmand Tribal District.
 (Inquiry Officer)
 District Mohmand

3/01/2024

Hd/

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ATTESTED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. _____/2024

Mst: Rifat Begum.....APPELLANT
VERSUS

The Edu: Deptt:RESPONDENT

KNOW ALL to whom these presents shall come that I the undersigned appoint: ***Umar Farooq Mohmand,***
Advocate High Court, Peshawar (herein after called the advocate) to be the Advocate for the ***Mst: Rifat Begum Ex.PST IHC***
Khar District Bajour in the above mentioned case, to do all the following acts, deeds and things or any of them, that is to say :

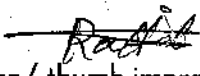
- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross-objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other Legal practitioner, authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

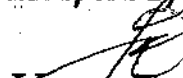
AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid, He shall be entitled to withdraw from the prosecution of the said case until the same is paid.

IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this ____th day of May, 2024


Signature/ thumb impression
of party / parties.

Accepted By


Umar Farooq Mohmand,


Advocate High Court, Peshawar.

Bar Council No:- 14-4822

CNIC No:- 17102-7315460-3

Cell No:- 0313-8901647

Email: umf7890@gmail.com

Waleed Adnan 

Advocate High Court, Peshawar.

Muhammad Ayub 

Advocate High Court, Peshawar.