

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

Ends No 305

SA No. 596/2024

Muhammad Faisal Abbasi.....APPELLANT

VERSUS

Govt of KPK & Others .....RESPONDENTS


**SERVICE APPEAL**

**PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO. 04**

**INDEX**

S #	Description	Page No's	Annexure
1	Comments along with Affidavit	01 to 04	
2	Copy of letter Endst: No. 256 dated 29-11-2023	05	"A" ✓
3	Copy of letter Endst: No. 10349 dated 22-11-2023	06	"B" ✓
4	Copy of Source Form	07	"C" ✓
5	Authority letter	08	D ✓

Dated: 16 /08/2024

  
 Principal  
 GHSS Ziarat Masoom  
 (Respondent No.04)

Principal  
 Govt. Higher Secondary School  
 Ziarat Masoom Abbottabad

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

SA No. 596/2024

Muhammad Faisal Abbasi.....APPELLANT

VERSUS

Govt. of KPK & Others .....RESPONDENTS

**SERVICE APPEAL**

**PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO. 04**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15031

Dated 16-08-24

**Respectfully Sheweth:**

Para wise comments on behalf of respondent are submitted as under:

**PRELIMINARY OBJECTIONS:-**

1. That the appellant has no cause of action to file the instant service appeal.
2. That the appellant has no locus standi to file the instant service appeal.
3. That as per complaint, an inquiry was initiated by the respondent No. 03 and inquiry officer submitted inquiry report on 02-08-2023 with the recommendation to recover Rs. 1777998/- from appellant on account of illegally drawn amount from school various heads.
4. That the appellant did not come to this Honorable Tribunal with clean hands.
5. That the appellant concealed and distorted the material facts from this Honorable Court and not entitled for any relief.
6. That in pursuance to the direction of respondent No. 03 vides letter No. 10349-EB-I/Complaints/File dated 22-11-2023, the predecessor of answering respondent directed the appellant to deposit amount of Rs. 1777998/- vide letter Endst No. 256 dated 29-11-2023 and a source form in this regard was sent to District Accounts Office for the purpose of recovery.
7. That the present service appeal has been filed just to pressurize the respondents.
8. That the instant service appeal is not maintainable in its present form.

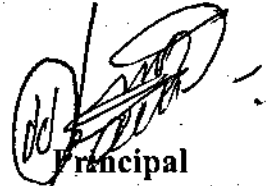
**Factual Objections:-**

1. That Para No. 1, of the instant service appeal does not relates to answering respondent hence, need no comment.
2. In reply to Para No. 2, of the instant service appeal it is submitted that in pursuance to the direction of respondent No. 03 vide letter No. 10349-EB-I/Complaints/File dated 22-11-2023, the predecessor of answering respondent directed the appellant to deposit amount of Rs. 1777998/- vide letter Endst No. 256 dated 29-11-2023 and a source form in this regard was sent to District Accounts Office for the purpose of recovery. (Copies of letter Endst: No. 256 dated 29-11-2023, letter Endst: No. 10349 dated 22-11-2023 & Source Form are annexed as **Annexure "A", "B" & "C"** respectively)
3. That Para No. 3, of the instant service appeal does not relate to answering respondent hence, need no comment.

**GROUNDS:-**

- a. That ground "a" of the instant appeal does not relate to answering respondent as impugn order was not issued by the answering respondent as same was issued by the respondent No. 03.
- a. That ground "a" of the instant appeal does not relate to answering respondent.
- b. That ground "b" of the instant appeal does not relate to answering respondent.
- c. That ground "c" of the instant appeal does not relate to answering respondent.
- d. That ground "d" of the instant appeal is subject to the cogent proof.
- e. That ground "e" of the instant appeal does not relate to answering respondent.
- f. That ground "f" of the instant appeal does not relate to answering respondent.
- g. That ground "g" of the instant appeal does not relate to answering respondent

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



Principal  
GHSS Ziarat Masoom  
(Respondent No.04)

*Qadim Nicheen*  
Principal  
Govt. Higher Secondary School  
Ziarat Masoom Abbottabad

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

SA No. 596/2024

Muhammad Faisal Abbasi.....APPELLANT

VERSUS

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**PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO. 04**

**AFFIDAVIT**

I, Mr. Qadim Khan, Principal GHSS Ziarat Masoom Abbottabad do hereby affirm and declare on oath that the contents of forgoing Comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

*It is further stated on oath that the foregoing respondents have neither been placed ex-parte nor their defense struck off/cost.*

*[Handwritten Signature]*  
DEPONENT

Principal  
Govt. Higher Secondary School  
Ziarat Masoom Abbottabad

**ATTESTED**



CA

**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 OLLEGALLY 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.

*Sd*

PRINCIPAL

GHSS ZIARAT MASOOM

COPY FORWARD TO

- ✓ 1. District Education Office (M) ABBOTTABAD

*Principal*

PRINCIPAL

GHSS ZIARAT MASOOM

**Principal**  
Gov. Higher Secondary School  
Ziarat Masoom Abbottabad

**B**

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD.**

NO 10349 EB/-1/complaints/File

Date: 22/11 2023

To,

The Principal,  
GHSS Ziarat Masoom,  
Abbottabad.

Subject:- **RECOVERY OF AMOUNT ILLEGALLY DRAWN BY MR.  
MR.FAISAL ABBASI SS/EX-IN CHARGE GHSS ZIARAT MASOOM**

Memo:

Reference to the subject cited above and inform you that a fact finding inquiry was conducted under this office Notification No.4470-74EB-1/File/Complaints dated 14-06-2023 regarding embezzlement in Conditional Grant/PTC Funds/Pupil funds by the Ex-Incharge Mr.Muhammad Faisal Abbasi SS Government Higher Secondary School Ziarat Masoom, Abbottabad.The inquiry committee submitted inquiry report through Principal Government High School No.04 Abbottabad/Chairman Inquiry Committee vide No.1521 dated 02.08.2023 with the following recommendations.

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 of pupil-fund (secondary section).
3. Profit of PTC fund amounting Rs- 524665/- be recovered and deposited in Government treasury.

You are directed to recover the above mentioned amount from Ex-Incharge Mr.Muhammad Faisal Abbasi Subject Specialist Government Higher Secondary School Ziarat Masoom Abbottabad under intimation to this office.

  
DISTRICT EDUCATION OFFICER (M)  
ABBOTTABAD





**Dist. Govt. NWFP-Provincial**  
**District Accounts Office Abbotabad**  
**Monthly Salary Statement (November-2023)**



Personal Information of Mr MUHAMMAD FAISAL d/w/s of MUHAMMAD SHAMRAIZ ABBASI

Personnel Number: 00392085 CNIC: 6110191142975 NTN:  
 Date of Birth: 29.11.1979 Entry into Govt. Service: 05.01.2008 Length of Service: 15 Years 10 Months 027 Days

**Employment Category: Vocational Temporary**

Designation: SUBJECT SPECIALIST 80000433-DISTRICT GOVERNMENT KHYBE

DDO Code: AD6093-GHS ZIARAT MASOOM

Payroll Section: 003

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

499,817.00

Vendor Number: -

**Pay and Allowances:**

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 17

Pay Stage: 15

Wage type		Amount	Wage type		Amount
0001	Basic Pay	96,370.00	1001	House Rent Allowance 45%	6,650.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	2,262.00
2148	15% Adhoc Relief All-2013	1,220.00	2199	Adhoc Relief Allow @10%	828.00
2316	Teaching Allowance 2021	6,074.00	2341	Dispr. Red All 15% 2022KP	9,385.00
2347	Adhoc Rel Al 15% 22(PS17)	9,386.00	2379	Adhoc Relief All 2023 30%	28,911.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3017	GPF Subscription	-6,350.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-7,134.00	3990	Emp.Edu. Fund KPK	-270.00
4004	R. Benefits & Death Comp:	-900.00	6075	Adj GPF	-8,320.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	900,000.00	-25,000.00	825,000.00

**Deductions - Income Tax**

Payable: 114,129.31 Recovered till November-2023: 35,667.00 Exempted: 28531.24 Recoverable: 49,931.07

**Gross Pay (Rs.): 166,086.00 Deductions: (Rs.): -49,474.00 Net Pay: (Rs.): 116,612.00**

Payee Name: MUHAMMAD FAISAL

Account Number: 6296-9

Bank Details: NATIONAL BANK OF PAKISTAN, 231483 NBP KH/GALI, Abbotabad

Leaves: Opening Balance: Aailed: Earned: Balance:

**Permanent Address:**

City: ISLAMABAD

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

*(Signature)*  
 Sajid Khan  
 SST (Bio/Chem)  
 GHS No. 1, Abbotabad

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

SA No. 596/2024

Mr. Faisal Abbasi .....Appellant  
VERSUS  
Govt: of KPK and others..... Respondents

**Authority letter**

It is certified that Mr Abid Khan SS (Urdu) BPS-17 GHSS Ziarat Massom is hereby authorized to submit parawise comments on behalf of Respondent No 4 Principal GHSS Ziarat Masoom, in service appeal No 596/2024, Titled Mr. Faisal Abbasi Versus Govt: of KPK and others.



Principal  
GHSS Ziarat Massom  
Abbottbad

**Principal**  
**Govt. Higher Secondary School**  
**Ziarat Masoom - Abbottabad**