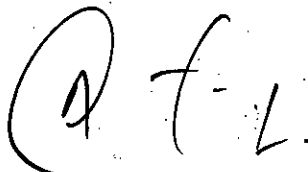


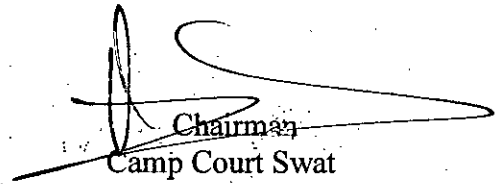
12.01.2016

Appellant with counsel and Mr. Bashir Ahmad, Head Master alongwith Mr. Muhammad Zubair, Sr,GP for respondents present. Learned counsel for the appellant submitted application for withdrawal of the instant appeal as the impugned order of demotion has been set aside by the appellate authority where-against the appellant is to seek redressal in the prescribed manners.

Learned counsel for the appellant therefore requested for withdrawal of the instant appeal. The same is dismissed as withdrawn. File be consigned to the record room.



Member



Chairman
Camp Court Swat

12.01.16.

ANNOUNCED

12.01.2016

1.6.2015

Appellant in person and Mr. Anwar-ul-Haq, G.P present. Representative of the respondents not in attendance. Notices to respondents be repeated for written reply for 3.8.2015 at camp court Swat.


Chairman
Camp Court Swat

3.8.2015

Appellant in person and Mr. Muhammad Zubair, Sr. GP for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 5.10.2015 before S.B at Camp Court Swat.


Chairman
Camp Court Swat

5.10.2015

Appellant in person and Mr. Bashir Ahmed, Headmaster along with Mr. Muhammad Zubair, Sr. GP for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 12.1.2016 at Camp Court Swat.


Chairman
Camp Court Swat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M NO. _____/2016

In appeal NO.165/2014

Nizam Ud Din

VS

Edu: Department

APPLICATION FOR WITHDRAWAL OF THE
ABOVE MENTIONED APPEAL

R.SHEWETH:

- 1- That the above mentioned appeal is pending adjudication before this Hon'ble Court in which 12.1.2016 date is fixed for hearing.
- 2- That in the above mentioned appeal the appellant has challenged the impugned order dated 28.9.2013 whereby the major penalty of demotion has been imposed on the appellant.
- 3- That the grievance of the appellant has been redressed by the respondents by setting aside the impugned order dated 28.9.2013.
- 4- That appellant is no more interested in the instant appeal, therefore the appellant seeks the permission of this august Tribunal to withdraw the instant appeal.

It is therefore most humbly prayed that on acceptance of this application the above mentioned appeal may kindly be dismissed as withdrawn.

Dated: 12.1.2016.

APPLICANT

THROUGH:
NOOR MOHAMMAD KHATTAK
ADEVOCATE

8.9.2014

Counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1 and Bashir Ahmad, Headmaster for respondent No. 3 with Mr. Ziaullah, GP for the respondents present. Written reply has not been received. However, representative of respondent No. 3 produced copy of order dated 27.8.2014 showing transfer of the appellant from GPS, Shah Kot to GPS, Asghar Shah, copy whereof is handed over to the learned counsel for the appellant for further proceedings written reply on 2.1.2015.


Chairman

02.01.2016

Clerk of counsel for the appellant and Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for further proceedings/written reply on 27.04.2016.


Reader.

27.04.2015

Appellant with counsel and Addl. A.G for respondents present. Written reply not submitted. Requested for adjournment. The appeal pertains to territorial limits of Malakand Division. To come up for written statement at Camp Court Swat on 1.6.2015


Chairman

Appeal No. 165/2014
Mr. Nizam-Ul-Din

3. 03.04.2014

Counsel for the appellant present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 28.09.2013, communicated to the appellant on 02.10.2013, he filed departmental appeal on 30.10.2013, which has not been responded within the statutory period of 90 days, hence the present appeal on 11.02.2014. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents for submission of written reply/comments on 16.06.2014.

Appellant Deposited
Security Process Fee
Rs. 180/- Bank
Receipt is attached with file

Member

4. 03.04.2014

This case be put before the Final Bench 1 for further proceedings.

Chairman

16.6.14

The Honorable bench is on recess
Order can be signed on 8-9.14



Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 165/2014

Sl.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	11/02/2014	<p>The appeal of Mr. Nizam-ud-Din presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;">  REGISTRAR </p>
2	18-2-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>3-4-2014</u></p> <p style="text-align: right;">  CHAIRMAN </p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 165 /2014


Nizam-Ud-Din

VS

Education Department

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1- 3.
2.	Suspension order dt:7.8.2013	A	4.
3.	Charge sheet	B	5.
4.	Statement of allegation	C	6.
5.	Copy of attendance & affidavit	D	7- 8.
6.	Impugned order	E	9.
7.	Departmental appeal	F	10.
8.	Vakalat nama	11.

THROUGH: **APPELLANT**

NOOR MOHAMMAD KHATTAK
ADVOCATE

- D- That no show cause notice has been served on the appellant before issuing adverse order dated 28/09/2013 against the appellant by the respondent Department.
- C- That no chance of personal hearing/defense has been given to the appellant before issuing the impugned order dated 28/09/2013.
- B- That appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- A- That the impugned order dated 28/09/2013 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

GRUNDS:

annexure
 others. Copy of the Departmental appeal are attached as
 Hence the present appeal on the following grounds:
 dated 30/10/2013 but no reply has been received so far.
 order dated 28/09/2013 before the respondent No.2 vide
 appellant filed Departmental appeal against the impugned
 4- That feeling aggrieved and having no other remedy the
 annexure E.

3- That vide order dated 28/09/2013 communicated to the
 appellant on 02/10/2013, the respondent Department
 without probe into the matter and conducting regular inquiry
 has straight away awarded two punishments (Double
 jeopardy) to the appellant i.e. Demotion from BP2-12 to
 BP2-14 and transferred the appellant to another Union
 Council. Copy of the impugned order is attached as
 annexure
 annexe
 A, B, C, D, of the
 impugned suspension order, charge sheet, statement of
 the appellant denied the allegation with photocopies of the
 on the appellant vide dated 07/08/2013. That in response
 Department served charge sheet and statement of allegation
 at suspension of the appellant. The respondent
 in the class I student namely Sayid Sheren Bachar. That
 planted allegation that appellant gave corporal punishment
 vide the appellant was suspended on the basis and
 established an order was issued dated 07/08/2013 due to
 2- That appellant while working as PHT (BP2-12) at GRS Serai

- E- That no regular inquiry has been conducting against the appellant which as per Supreme Court judgments is necessary in punitive actions against the civil servants.
- F- That impugned order dated 28/09/2013 amounts to double jeopardy which is not tenable under the principal of natural justice.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT



NIZAM-UD-DIN

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MALAKAND AT BATKHELA

SUSPENSION ORDER

Consequent upon the complaint received from Mr. Hameedullah S/o Toor Gul grand father of Sayal S/o Sherin Bacha 1st class student of G.P.S. Jalal Kot, District Malakand regarding illegal corporal punishment to the above named student. Mr. Nizamud Din P.S.H.T. Government Primary school ^{Sayal} Jalal Kot (Tehsil Batkhela), District Malakand is hereby suspended from service for next three months with effect from 07-08-2013. He is however allowed subsistence grant during the period of his suspension as admissible to him under the rules.

Note:- Necessary entry to this effect should be made in his service book accordingly.

(ABDULLAH)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. 4002-08 / F.No. Suspension/PST(M) Dated 7 / 8 / 2013.

Copy forwarded for information to:-

1. The Secretary Elementary and Secondary Education, Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The Director, ESRU, Khyber Pakhtunkhwa Civil Secretariat Peshawar.
4. The Sub Divisional Education officer, (Male) Swat Ranizai at Batkhela District Malakand
6. The Agency Accounts officer, Malakand.
7. The Head teacher G.P.S. Jalal kot (Julagram) District Malakand.

Sayal

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) SWAT RANIZAI AT BATKHELA.

Endst: No. 1243-45 / F.No. Dated 15 / 8 / 2013.

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

1. The District Education officer (Male) Malakand at Batkhela w/r to his office endst: No. 2004-09 dated 7-08-2013.
2. The A.S.D.E.O. Circle Batkhela for necessary action and strict compliance.
3. The Head teacher G.P.S. Jalal Kot, District Malakand.

SUB DIVISIONAL EDUCATION OFFICER (MALE)
SWAT RANIZAI AT BATKHELA.

Relieved from Nazam Khan Sayal P.S.H.T. G.P.S. Hatam Banda

AKB 15/8/13

ATTACHED

1. Complaint of 07/9

There is no complaint removal in Dist Register. 12/12/2013 Complain Cell

CHARGE SHEET.

I, Abdullah, DEO (Male) Malakand, as competent authority, hereby charge you Mr. Nizamud in PSHT, as follows:-

That you, while posted as PSHT, at GPS, Jalal kot committed the following acts/omission specified in Rule 3 of the Khyber Pakhtunkhwa Government servants (Efficiency and Disciplinary) Rules, 2011.

- a) Misconduct.
 - i) Illegal corporal punishment to Mr. Sayal S/o Sherin Bacha 1st class student at GPS, Jalal kot, which caused fracture in leg of the afflicted student.
 - ii) Violation of Government rules vide Notification No. ESED/ESRU/C.P/2011-12 dated 11-04-2012.
 - b) Inefficiency.

Ceased to be efficient for the reason mention in para (a) above.
- (2) By reason of the above, you appear to be guilty of Misconduct under rule-3 of the Khyber pakhtunkhwa Government servants (Efficiency and Disciplinary) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rules -4 of the rules ibid.
 3. You, are therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the undersigned.
 4. Your written defense, if any, should reach this office within the specified period failing which it shall be presumed that you have no defense to put in and in that case ex- parte action shall be taken against you.
 5. Intimate whether you desire to be heard in person.
 6. Statement of allegations is enclosed.

(ABDULLAH)

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

ATTESTED

12/19

19 31

C-6

DISCIPLINARY ACTION.

I, Abdullah, DEO(Male) Malakand, as competent authority, am of the opinion that Nizamud Din, PSHT, GPS, Jalal kot, District Malakand has rendered himself to be proceeded against, as he has committed the following acts/omission within the meaning of Rules-3 of the Khyber Pakhtunkhwa Government servants (Efficiency and Disciplinary) Rules, 2011.

STATEMENT OF ALLEGATION.

- i) Illegal corporal punishment to Mr. Sayal S/o Sherin Bacha 1st class student of G.P.S.Jalal kot,(D/Julagram)District Malakand which caused fracture in leg of the afflicted student.
 - ii) Violation of Government rules vide Notification No.ESED /ESRU/C-P/2011-12 dated 11-04-2012.
- b) Ceased to be efficient for the reason mention in para (a) above.
2. For the purpose of inquiry against the said accused with reference to the above allegation, the following officers of E&SE Deptt: is hereby appointed as inquiry committee.

S.No	Name of officer.	Designation.	Appointment as
1.	Mr. Fazal Ahad Khan.	Dy:D.E.O.(M) Malakand.	Chairman
2.	Mr. Sher Bacha.	Headmaster GHS,C.C Thana.	Member

3. The inquiry committee shall in accordance with the provision of the ibid rules, provide reasonable opportunity of hearing to the accused PSHT, record its findings and make, upto 15-8-2013, recommendation as to punishment or other appropriate action against the accused.
4. The accused and a well conversant representative of the Department shall join the proceedings on the date, time and place fixed by the inquiry committee.

(ABDULLAH)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. 4011-15 /FNo.Corporal punishment/PSHT/DEO(M)Malakand Dated 7-08 /2013.

Copy of the above alongwith copies of charge sheets is forwarded to:-

- 1. Mr. Fazal Ahad DY: DEO(M)Malakand with the direction to serve the attached charge sheet upon the accused teacher and provide him reasonable opportunity of personal hearing.
- 2. The Headmaster GHS, College coloney Thana, District Malakand. Member.
- 3. ✓ The accused PSHT, GPS, Jalal kot, District Malakand with the direction to appear before the inquiry committee and put his defence in writing at the time date and venue fixed by him.
- 4. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 5. The Dealing Assistant concerned local office with the direction to join the process of inquiry as a representative of the Department at the time and date as fixed by the inquiry committee.
- 6. The SDEO (M) Batkhela.

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA

ATTESTED

[Handwritten signature]

اقرار نامہ

میں مسیحی اسلام بادشاہ چوکیدار جی پی ایس سیری جلال کوٹ
 جو اس لحاظ سے درست کر کے اقرار کرتا ہوں۔

کہ مورخہ چھ، ستمبر 2013ء کو نظام الدین (HPST) نے

دوران ڈیوٹی سکول ہذا میں کسی بھی بچے کو جسمانی سزا نہیں
 دی ہے۔

سائل احمد ولد شیرین بادشاہ جو کہ اول جماعت کا طالب علم ہے
 متعلقہ استاد صاحب نے میرے روبرو کسی قسم کی جسمانی سزا نہیں

دی ہے۔ اور نہ سکول ہذا میں دوران ڈیوٹی سزا کے باعث سائل احمد

کے پاؤں میں فریکچر ہو کر رہا ہے۔ نہ چیخ و پکار اور رونے

کی آواز سنی ہے اور نہ ڈاکٹر کے پاس دوران ڈیوٹی کسی
 بھی بچے کو سکول ہذا سے لے گیا ہے۔

یعنی سکول ہذا میں بچے کی مارنے کی کوئی واقعہ سرزد

نہیں ہوئی ہے۔ (یہ میرا بیان ہے)

الرقوم 8/2013

السلام بادشاہ

اسلام بادشاہ ولد خان باچہ (مرحوم)

چوکیدار جی پی ایس سیری جلال کوٹ

بخت روان PTC چیمبر میں

محمد اقبال PTC بارٹوخ شخص محمد اقبال

ATTESTED

9/7

E-9

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

No. _____ /
Dated _____ /2013.

OFFICE ORDER.

WHEREAS, MR. NIZAMUD DIN PSHT B-15 Government Primary school Serai Jalal Kot, Malakand Agency was proceeded against under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 on account of Corporal punishment given to the Class-I student named Sayal S/o Sherin Bacha, GPS, Serai Jalal kot / misbehavior with enquiry committee and refused to took over questionnaire from the enquiry committee.

2. AND WHEREAS, the above named teacher was suspended from service on the written complaint of the grandfather of the student vide this office order endst: No. 4002- 08 dated 07-08-2013.

3. AND WHEREAS, a preliminary enquiry committee was constituted to conduct enquiry against the accused teacher vide this office order endst: No. 4011- 15 dated 07- 08-2013. The enquiry committee conducted enquiry against the above named teacher and report submitted on 30- 08- 2013 and found guilty and the charges leveled against him was proved against him during the enquiry.

4. AND WHEREAS, the Competent authority D.E.O.(Male) Malakand at Batkhela after having considered the charges, evidence on record, non taken over questionnaire from the enquiry committee and misbehavior with enquiry committee, is of the view that the charges of corporal punishment given to the Class-I student named Sayal S/o Sherin Bacha / non taken over questionnaire from the enquiry committee, and misbehavior with enquiry committee against the accused official have been proved.

5. NOW THEREFORE, in exercise of power conferred under Section-9 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011, the competent authority is pleased to impose the minor penalty of demotion from PSHT BPS-15 to SPST BPS-14 with effect from 07- 08-2013 and he is hereby transferred to G.P.S.Haibat Gram against the vacant SPST B-14 post.

(ABDULLAH)

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst:No. 5512-18 /F.No.Corporal punishment Dated 28-09 /2013.

Copy forwarded for information and necessary action to:-

1. P.S. to Secretary Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. The Director, **ESRU**, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
4. The Sub Divisional Education officer (Male) Swat Ranizai at Batkhela with the remarks that necessary entry to this effect may be made in the service book of the teacher concerned positively.
5. The Agency Accounts officer, Malakand.
6. The Asstt:Programmer, DEMIS, Cell local office.
7. ✓ The teacher concerned.

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Received from *gslambadshah*
on dated *2/10/2013*

ATTESTED

[Signature]

بخدمت جناب ڈائریکٹر ایلیمینٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

عنوان: اپیل بر خلاف منسوخ آرڈر تبادلہ و ڈیموشن Endst No 5512-18 Dated 28/09/2013

جناب عالی

گزارش حسب ذیل ہے۔

- (۱) یہ کہ مدرس تقریباً تیس سال سے محکمہ ایجوکیشن میں تعینات ہے۔
- (۲) نہایت احسن، لگن اور ایمانداری سے فرائض سرانجام دے رہے ہیں۔
- (۳) بصورخہ 07/08/2013 کو مدرس کے خلاف شکایت درخواست بابت جسمانی سزا دائر ہوئی تھی جس کی روسے مدرس کو مائنر پلینٹی دیگر BPS 15 سے BPS 14 میں ایڈجسٹ کر کے ٹرانسفر کیا گیا۔
- (۴) 06/08/2013 کو عصر کے وقت بچے کی چچانے فون پر رابطہ کر کے من گھڑت اور جھوٹ پر مبنی مقدمہ بنانے کی دھمکی دی۔ 7,6 اگست کو بچہ سکول ہذا سے غیر حاضر تھا۔
- (۵) بچے کی پاؤں میں کسی قسم کی فزیکل اور زخم نہیں تھا اور باقاعدگی سے سکول آتا ہے۔
- (۶) مدرس نے بروقت اپنا موقف اور بیان دفتر ہذا پہنچا کر داخل کرانا چاہا۔ لیکن Dy DEO فضل احمد عبداللہ نے ذاتی عناد اور لالچ کی غرض سے انکار کر کے مدرس کو دفتر سے نکال کر Suspension آرڈر ایشو کیا۔
- (۷) 12/08/2013 کو دوران انکوائری میرا موقف اور بیان نہیں سنا گیا۔
- (۸) دوسرا انکوائری 21/08/2013 کو ہوئی۔ بچے کا دوبارہ ڈاکٹری معائنہ کرنے اور دونوں انکوائری کے سوالنامے دینے سے انکار کیا۔
- (۹) دوران انکوائری اپنے تحفظات اور عزرات کلاس 4 اقرار نامہ اور بیان مدعی پیش کیا۔
- (۱۰) چئیرمین انکوائری کمیٹی فضل احمد نے مذکورہ دستاویزات لینے سے انکار کر کے سائل کے خلاف کارروائی کرنے پر نلا ہوا تھا۔
- (۱۱) Dy DEO فضل احمد 10 سال سے ٹوکل ایریا میں ڈیوٹی پر مامور ہے۔ ایک ہی گاؤں میں رہائش کے باوجود ذاتی عناد اور لالچ کی غرض سے ایک ماہ کی تنخواہ کات چکی ہے۔
- (۱۲) ایک بار پھر من گھڑت اور جھوٹ پر مبنی انکوائری بنا کر مدرس کو ناانسانی نقصان پہنچایا جس سے سائل ذہنی کوفت، ذلت، رسوائی اور شرمندگی سے دوچار ہونا پڑا۔
- (۱۳) اپنے گاؤں کے بے شمار انکوائریاں بغیر کسی پینشمنٹ کے ختم کئے ہیں۔ اسلئے استدعا کی جاتی ہے کہ مذکورہ آرڈر منسوخ کرانے اور سابقہ سٹیشن میں تعیناتی کے احکامات صادر فرمائیں۔

العارض

نظام الدین PST جی پی ایس ہیبت گرام تھانہ ضلع ملاکنڈ

ATTESTED

(Handwritten signature)

(Handwritten notes: D No 2490 / 30/09/13)

(Handwritten signature: محمد ہارون الرشید)

VAKALATNAMA

IN THE COURT OF J KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
OF 2014

NIZAM-UD-DIN

✓
(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

EDUCATION DEPT

✓
(RESPONDENT)
(DEFENDANT)

I/We NIZAM-UD-DIN

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/~~us~~ as my/~~our~~ Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/~~our~~ cost. I/~~we~~ authorize the said Advocate to deposit, withdraw and receive on my/~~our~~ behalf all sums and amounts payable or deposited on my/~~our~~ account in the above noted matter.

Dated. 28 / 01 / 2014

Nizam

CLIENT

N.M.

ACCEPTED

NOOR MOHAMMAD KHATTAK
(ADVOCATE)

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391
Mobile No.0345-9383141

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MALAKAND AT BATKHELA.

TRANSFER ORDER.

The following primary school Head teachers BPS-15 are hereby transferred to the schools noted against each their names on their own pay and scales in the interest of public service from the date of their taking over charges.

S.No	Name of teacher/Designation	From	To	Remarks
1.	Mr. Fazli Naeem PSHT B-15	GPS, Sorana	GPS, Chinar kotoo	Against vacant post.
2.	Mr. Iqbal Hussain PSHT B-15	GPS, No.01 Prangi	GPS, Rang Muhallah	Vice S.No.06
3	Mr. Hussain Ahmad. PSHT B-15	GPS, Asghar shah	GPS, Dewan shah Banda.	Against vacant post
4	Mr. Muhammad Diyar PSHT B-15	GPS, Bagh Dara	GPS, Sorana	Against vacant post.
5	Mr. Nizamud Din PSHT B-15	GPS, Shah Kot	GPS, Asghar shah	V.SNo.03
6	Mr. Sabir Shah PSHT B-15	GPS, Rang Muhallah	GPS, Jalawanan	Against vacant post.

Note:-

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.

(SYED MANZAR JAN SAJID)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

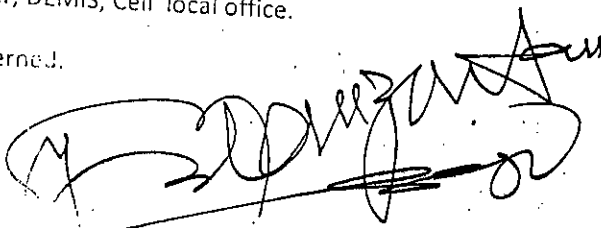
Endst:No. 4677-83

/F.No. Transfers/ PSTs

Dated 27-8- /2014.

Copy forwarded for information and necessary action to:-

1. The Sub Divisional Education officer (Male) Batkhela.
2. The Sub Divisional Education officer (Male) Dargai.
3. The District Accounts officer, Malakand.
4. The Assistant Programmer, DEMIS, Cell local office.
5. The Head teachers concerned.
- 6-7- The teachers concerned.


Distt: Edu: Officer (M)
Malakand at Batkhela

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA PESHAWAR

Service Appeal No 165/2014

**Mr. Nizam-ud-Din PSHT (BPS-15) GPS Serai Jalal Kot,
Under Transfer to GPS Haibat Gram, District Malakand. (Appellant)**

VERSUS

- 1. The Secretary to Govt of Khyber Pakhtoonkhwa Elementary and secondary Education Peshawar**
- 2. The Director Elementary & Secondary Education, Khyber Pakhtoonkhwa, Peshawar.**
- 3. The District Education Officer (Male) Malakand at Batkhela.**

(Respondents)

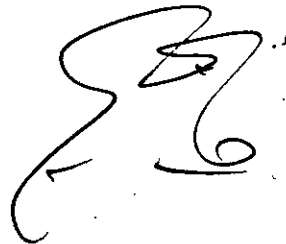
Para wise comments on behalf of respondents no 1-3

Respectfully Sheweth
Preliminary Objections.

1. That the appeal is badly barred by time and under the rules is not maintainable.
2. That the appellant had concealed material facts from the Honorable Service Tribunal.
3. That the appellant had got no cause of action to file the instant appeal.
4. That the appellant has got no locus standi to ask for claim.
5. That the appellant is estopped by his own conduct to file the present appeal.
6. That the appeal is not maintainable in its present form and is not competent.
7. That the Honorable Tribunal has no jurisdiction to entertain the appeal.

FACTS.

1. No Comments pertaining to record.
2. Incorrect, Mr. Hamidullah S/O Toor Gul resident of Jalal Kot lodged a written complaint along with Medical Report/X-ray to the respondent No 3 dated 07/08/2013 against the Appellant regarding corporal punishment given by him to the Class-1 student named Sayal S/O Sherin Bacha. It was evident from the wounds and Doctor's



prescription that the Appellant severely beaten where video clips and gestures of the student and his grandfather were recorded. While the Govt of Khyber Pakhtoonkhwa already issued circulations to the education Department in this connection. So the Respondent No 3 suspended the appellant for the next three months.

(Annexure A, B, C, D)

- 3 Incorrect, As to ensure strict compliance of higher authority, Respondent No 3 took immediate remedial actions and conducted inquiry against the appellant and the inquiry officer recommended for him minor penalty i.e, demotion from BPS-15 to BPS-14 and transfer to far flung area on administrative ground in the interest of public service.(Annexure E, F)
- 4 Incorrect, Respondent No. 2 accepted his appeal against the impugned order, the demotion order was withdrawn and the appellant was adjusted against the vacant PSHT BPS-15 post at Govt, Primary School Shah Kot(Palai) vide order bearing Endst No 3076 dated 13-06-2014 from the date of his demotion, However his one annual increment has been stopped for the period of two years.(Annexure G, H)

GROUND.

- A Not admitted, the impugned order dated 28/09/2013 is not against the law, facts and norms of natural justice and materials on the record showed that no violation has been made issuing the impugned order, however, as mentioned above the impugned order is withdrawn.
- B Incorrect, the appellant has been treated in accordance with law by the respondent department and no violation has been made of the Constitution of Islamic Republic of Pakistan 1973.
- C Incorrect, before issuing the impugned Order dated 28/09/2013 the appellant has been given the chance of personal hearing /defense..(Annexure I,J)
- D Incorrect, Statement of allegations, Charge sheet, Departmental inquiry and Personal hearing all codle formalities were fulfilled before issuing the impugned order.
- E Incorrect, regular inquiry has been conducted against the appellant.
- F Incorrect, Demotion has been withdrawn and only one annual increment was stopped for the two years.
- G The Respondents ask seek permission to raise additional grounds at the time of arguments.



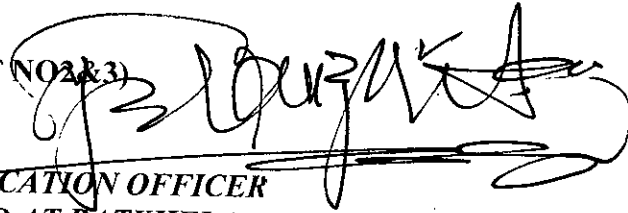
It is therefore most humbly prayed that in the light of the above facts the instant appeal may be dismissed with cost.

(RESPONDENT NO1)



SECRETARY,
E&SE DEPARTMENT, GOVT OF KHYBER
PAKHTUNKHWA AT PESHAWAR

(RESPONDENT NO2&3)



DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA PESHAWAR

Service Appeal No 165/2014

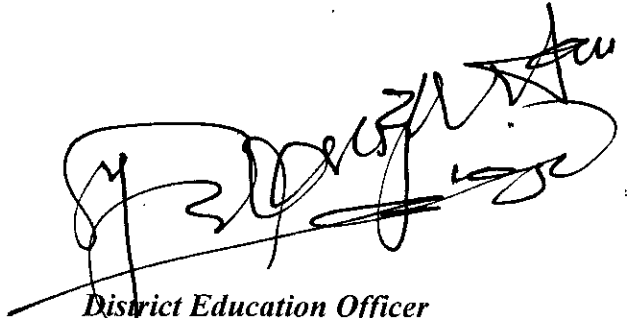
**Mr.Nizam-ud-Din PSHT (BPS-15) GPS Serai Jalal Kot,
Under Transfer to GPS Haibat Gram, District Malakand. (Appellant)**

VERSUS

- 1. The Secretary to Govt of Khyber Pakhtoonkhwa Elementary and secondary Education Peshawar**
- 2. The Director Elementary &Secondary Education, Khyber Pakhtoonkhwa, Peshawar.**
- 3. The District Education Officer (Male) Malakand at Batkhela.**

AFFIDAVIT

I , do hereby solemnly affirm and declare on oath that all the contents of the accompanying parawise comments are true and correct to the best of my knowledge and belief and all the coddle formalities were fulfilled.


**District Education Officer
(M) Malakand at Batkhela.**

NOTIFICATION.

All the Executive District Officers (Elementary & Secondary) Education, in Khyber Pakhtunkhwa, are hereby **authorized** to appear before the learned Khyber Pakhtunkhwa, Service Tribunal, Peshawar, Camp court at Abbottabad, D.I.Khan, Mingora at Swat as well as Hon'able Peshawar High court Peshawar, Abbottabad bench, D.I.Khan bench, Bannu bench, Dar Ul Qaza Mingora at Swat & August Supreme Court Of Pakistan; at Islamabad & Peshawar bench where, the Executive District Officer (E&SE) concerned as well as District Coordination Officer is competent authority in case of BS-01 to BS-15 (District Cadre Posts) on behalf of Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

The Executive District Officers Elementary & Secondary Education, in Khyber Pakhtunkhwa are also directed to prepare para wise comments in case of (BS-01 to BS-15) where the EDO concerned is competent authority & signed the same on behalf of Director, Elementary & Secondary Education, Khyber Pakhtunkhwa & also attend the relevant courts on each hearing date positively. In case of failure the EDO, (E&SE) concerned will be personally responsible for any consequences.

The requisite report of court cases must be furnished to this Directorate on each of 5th month separately, i.e. Peshawar High Court, Service Tribunal, Civil suit cases & Supreme Court of Pakistan cases.

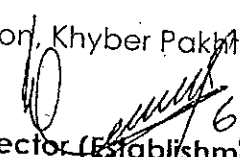
Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst:No. 1407-73

Dateel - 7/3/2012

Copy forwarded for information to the:-

1. Additional Registrar Peshawar High Court Peshawar.
2. Additional Registrar, Peshawar High Court Abbottabad Bench.
3. Additional Registrar, Peshawar High Court D.I.Khan Bench.
4. Additional Registrar, Peshawar High Court Bannu.
5. Additional Registrar, Peshawar High Court Mingora/Swat Bench
6. Additional Advocate General Khyber Pakhtunkhwa, Abbottabad Bench.
7. Additional Advocate General Khyber Pakhtunkhwa, D.I.Khan Bench
8. Additional Advocate General Khyber Pakhtunkhwa, Bannu Bench.
9. Additional Advocate General, Khyber Pakhtunkhwa, Mingora/Swat Bench
10. Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar.
11. Additional Advocate General, Khyber Pakhtunkhwa, Service Tribunal Peshawar.
12. Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
13. Special Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 14-38. All District Coordination Officers concerned
- 39-64. All Executive District Officers (Elementary & Secondary) Education in Khyber Pakhtunkhwa for strict compliance.
65. Assistant Director (Litigation-II) Local Directorate.
66. PA to Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.


Deputy Director (Establishment)
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

کہ یہ صاحب نے خود اپنی ہونٹوں پر آگ لگا کر دیکھا ہے

7
American

درخواست پر عدالت میں رپورٹ کی اور جج صاحب نے حکم

حاجی عالی
نمبر 10 کے مع میرا بیٹا اسٹائل ولد شہیرین باجم عانت اول کو
مستی نظام الدین پتھر پتھر اور غنت پرائمری سکول سہیلی حلال
خانہ دردی سے مارا جس سے بچے کا ٹخنہ زخمی ہوا۔ ہسپتال کا نسخہ
لکھ آئی ہے منسلک ہے۔ میں بچے کا دادا مستی محمد اللہ ولد نور علی
حلال آرٹ رپورٹ کرتا ہوں۔ کہ متعلقہ استاد کی زیادتی کا
یو جھما جائے اور قانونی کارروائی کرنا سہرا دی جائے۔

6/8/2013

محمد اللہ

محمد اللہ ولد نور علی سندھ حلال آرٹ

شناختی کارڈ نمبر 1-9397-8786-15402

Suspected the said member
has been involved in a member
Mr. Sher B...
15/7/2013

15/7/2013

7/7/2013

0136
ON NO

02 83

SUSPENSION ORDER.

9
Amroha C)

Consequent upon the complaint received from Mr. Hameedullah S/o Toor grand father of Sayal S/o Sherin Bacha 1st class student of G.P.S. Jalal Kot, District Malakand regarding illegal corporal punishment to the above named student. Mr. Nizamud Din P.S.H.T. Government Primary school Jalal Kot (Tehsil Batkhela), District Malakand is hereby suspended from service for next three months with effect from 07-08-2013. He is however allowed subsistence grant during the period of his suspension as admissible to him under the rules.

Note:- Necessary entry to this effect should be made in his service book accordingly.

(ABDULLAH)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. 4002-08 /F.No. Suspension/PST(M) * Dated 7-08 / 2013.

Copy forwarded for information to:-

1. The Secretary Elementary and Secondary Education, Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The Director, ESRU, Khyber Pakhtunkhwa Civil Secretariat Peshawar.
4. The Sub Divisional Education officer, (Male) Swat Ranizai at Batkhela District Malakand
5. The Agency Accounts officer, Malakand.
6. The Head teacher G.P.S. Jalal kot (Julagram) Distirct Malakand.

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA



GOVERNMENT OF KHYBER PAKHTUNKHWA
Elementary & Secondary Education Department
Education Sector Reforms Unit
Block A, Civil Secretariat Peshawar
Ph:091-9213835
MOI/ESRU/Corporal Punishment/2013

(Annexure D.) (40)

Dated Peshawar, 14-10-2013

TO

1. The Director, Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. All DEOs (Male & Female), Elementary and Secondary Education Khyber Pakhtunkhwa. *Malakand*

SUBJECT: BAN ON CORPORAL PUNISHMENT OF STUDENTS AND CHILD LABOUR IN EDUCATIONAL INSTITUTIONS.

In continuation of the notification No. ESED/ESRU/C.P/2011-12 of Elementary and Secondary Education department, dated 11.04.2012 on the captioned subject and to convey further that this department is continuously receiving complaints and press clippings regarding incidents of corporal punishment, which are not properly followed up at district level through "Monitoring and Grievance Redressal Mechanism" established at district level and Directorate of E&SE department.

2. Furthermore, the department has issued letters for immediate remedial actions in all the cases regarding corporal punishment, but the reports from the concerned districts are still awaited.

3. All the DEOs are directed, to take immediate remedial actions in the subject matter through proper follow up of the established redressal mechanism, instead of waiting for any directions to be issued from the secretariat and to call explanation of the focal persons in case of non-compliance.

4. Please ensure strict compliance.

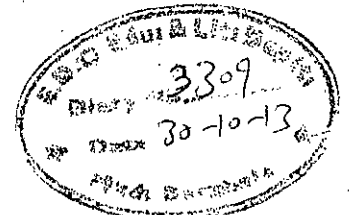
Jandiy ay 70
(JUDAT AYAZ)
Secretary
Elementary & Secondary Education Department
Govt of Khyber Pakhtunkhwa
14/10/13

ESRU/Amak
M/10/13

Endst: Even No. and Date

Copy for information and necessary action to:

- All DGs with a request to take necessary action on their part.
- Deputy Director (ESRU), Elementary and Secondary Education Department.
- Director DCTE, Abbottabad, E&SED.
- Director PITE Peshawar, E&SED.
- MD EEF, Peshawar.
- Deputy Director EMIS, E&SED.
- All section Officers, E&SED.



M. Akh
(Abidullah KakaKhel)
Director
Education Sector Reforms Unit

(Annexure E) 71

DISCIPLINARY ACTION.

1, Abdullah, DEO(Male)Malakand, as competent authority, am of the opinion that Nizamud Din, PSHT, GPS, Jalal kot, District Malakand has rendered himself to be proceeded against, as he has committed the following acts/omission within the meaning of Rules-3 of the Khyber Pakhtunkhwa Government servants (Efficiency and Disciplinary) Rules, 2011.

STATEMENT OF ALLEGATIONA.

The Deputy Distt:officer(M)local office was directed to confirm the complaints received in connection with illegal corporal punishment to Mr. Sayal S/o Sherin Bacha 1st class student of GPS, Jalal kot, District Malakand, Mr. Nizamud Din PSHT, recently promoted, during probationary period has committed the following irregularities.

Misconduct.

- i) Illegal corporal punishment to Mr. Sayal S/o Sherin Bacha 1st class student of G.P.S.Jalal kot,(D/Julagram)District Malakand and wounded the foot of the above named student.
- b) Ceased to be efficient for the reason mention in para (a) above.

2. For the purpose of inquiry against the said accused with reference to the above allegation, the following officers of E&SE Deptt: is hereby appointed as inquiry committee.

S.No	Name of officer.	Designation.	Appointment as
1.	Mr. Fazal Ahad Khan.	Dy:D.E.O.(M) Malakand.	Chairman
2.	Mr. Sher Bacha.	Headmaster GHS,C.C Thana.	Member

3. The inquiry committee shall in accordance with the provision of the bid rules; provide reasonable opportunity of hearing to the accused PSHT, record its findings and make, upto 15-8-2013, recommendation as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the Department shall join the proceedings on the date, time and place fixed by the inquiry committee.

(ABDULLAH)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. _____/FNo.Corporal punishment/PSHT/DEO(M)Malakand Dated _____ /2013.

Copy of the above alongwith copies of charge sheets is forwarded to:-

- 1. Mr. Fazal Ahad DY: DEO(M)Malakand with the direction to serve the attached charge sheet upon the accused teacher and provide him reasonable opportunity of personal hearing.
- 2. The Headmaster GHS, College coloney Thana, District Malakand. Member.
- 3. The accused PSHT, GPS, Jalal kot, District Malakand with the direction to appear before the inquiry committee and put his defence in writing at the time date and venue fixed by him.
- 4. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 5. The Dealing Assistant concerned local office with the direction to join the process of inquiry as a representative of the Department at the time and date as fixed by the inquiry committee.

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

[Handwritten signature]

1

ENQUIRY

PRELIMINARY ENQUIRY AGAINST NIZAM UD DIN HEAD TEACHER GPS SERAI JALAL KOT

(Annexure F)
25

INTRODUCTION

The undersigned being an enquiry officer visited GPS Serai Jalal Kot on 12-08-2013, regarding preliminary enquiry against Nizam ud Din Head Teacher in connection with corporal punishment given to the class-1 student named Sayal S/O Sherin Bacha, Serai Jalal Kot.

On 21/08/2013 I accompanied by Sher Badshah HM GHS CC Thana (Member of the Enquiry Committee) visited the school again to give another opportunity to the accused teacher to complete the Enquiry proceedings amicably.

BACKGROUND:

On 07/08/2013 Mr. Hamidullah S/O Toor Gul resident Jalal Kot Serai lodged a written complaint along with Medical Report / X-ray to the DEO (M) Malakand against the Head Teacher Nizam ud Din regarding corporal punishment given by him to Class-1 student named Sayal s/o Sherin Bacha. It was evident from the wounds and Doctor's prescription that the Head Teacher severely beaten up the student so harshly. The student was examined in the office in the front of SDEO (M) Swat Ranizai where video clips and gestures of the student and his grandfather were recorded.

FINDINGS:

Four students of Class-1 were interrogated one by one and altogether to dig out the facts that how the Head Teacher mis-treated the student. The students unanimously disclosed that the Head Teacher used a timber stick and hit the right foot of the student six times which made him unable to walk. The student was taken away by his grandfather to orthopedic specialist Dr. Mubarak Zeb for Medical treatment, where it was confirmed that he received serious injuries.

Questionnaire was served to the Head Teacher to complete the enquiry proceedings but he misbehaved and refused to cooperate and threw away the questionnaire which is clear cut misconduct and a punishable offence under E&D Rules 2011. The repercussion of his harsh and wild attitude were also seen on the faces of other students of the school. The parents of the locality were pressing hard to shift their kids from the school to another schools if immediate action not taken in this regard.

On 21/08/2013, another precise questioner served to the culprit teacher but once again he refused to have it. Sail a student of class-1 who received severe caporal punishment was examined once again and found him limping with the help of stick when walking. His injured foot was still covered with a bandage.

Seven Students of class -1 named Husna, Yasir, Sajjid, Rehanullah, Abdurrahim, Muneeb khan and Umer Ali they also received corporal punishment one or Two sticks that day when interrogated. Hazrat Hussain Class-2 brought a Timber Stick for the teacher a month earlier which used so vigorously and all the students of 5th class received corporal punishment regularly.

After the ugly incident of August 7th, 2013 the H/T broke the Timber stick into pieces and threw away outside the school.

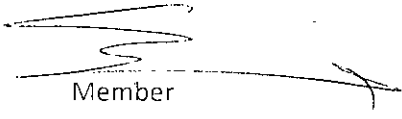
ENQUIRY


24

PRELIMINARY

Keeping in view the ground reality and evidence on the record, it is crystal clear that Nizam ud Din Head Teacher is found guilty of committing such a heinous crime by beaten up an innocent Class-1 Kid which caused serious injury on his right foot and black scars (gangrene looking) on his shoulder and back. Corporal punishment is strictly forbidden under the law; any offender may be treated iron handedly.

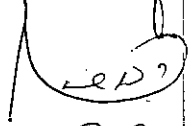
The undersigned is pleased to recommend the culprit teacher for minor penalty and to demote him to BPS-14, and transfer him to far flung area on administrative ground in the interest of Public Service.


Member
SHER BADSHAH
GHS CC Thana

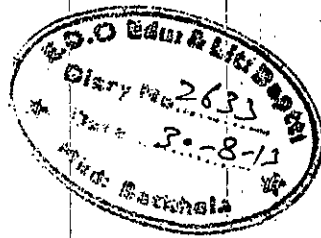

Chairman
(FAZAL AHAD)
DEPUTY DISTRICT OFFICER (M)
MALAKAND AT BATKHELA

Implement the recommendation of
The Enquiry Committee in letter
spirit.

30/8/13

Mr. Farooq
Please do the needful.

30/8/13

supdt:
go ahead as
directed pl.
30-8-13



THE UNIVERSITY OF CHICAGO

1950

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY
58 CHEMISTRY BUILDING
CHICAGO, ILLINOIS 60637

TO THE DIRECTOR

FROM THE DIRECTOR

RE: [Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

(60)
Annexure 9

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA

ORDER.

1. WHEREAS, Mr. Nizamud Din PSHT GPS Seri Jalal Kot Malakand was beaten an innocent Class-I kid which caused serious injury on his right foot and he was proceeded against under the Khyber Pakhtunkhwa Government Servant (Efficiency & Disciplinary) Rules, 2011 for the said charges. The teacher was suspended vide DEO (M) Malakand office order Endst: No.4002-08 dated 07.08.2013.
2. AND WHEREAS. In this connection two officer were appointed to conduct enquiry against him.
3. AND WHEREAS, The inquiry committee conducted inquiry against the teacher and charges levelled against him was proved.
4. AND WHEREAS, In the light of the enquiry report the teacher concerned was demoted from PSHT B-15 to SPST B-14 and was transferred to GPS Haibat Gram vide office order Endst: No.5512-18 dated 08.09.2013.
5. NOW THEREFORE. In exercise of powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 his appeal has been accepted and the orders of the DEO (M) Malakand vide Notification cited above is hereby set aside and the demotion is hereby withdrawn. The one annual increment is hereby stopped for the period of two years.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

3172-76
Endst: No. _____ /F No. 18/Vol: VI/PST (M) Malakand Dated Peshawar the 27/5/2014.

Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Malakand w/r to his No.1094 dated 20.01.2014.
2. District Accounts Officer Malakand.
3. Teacher concerned.
4. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.
5. Master File.

1199
3-6-14

27/5/14
Deputy Director (Estb):
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

27/5/14

DA
6/2/14
swamp
ce
G.A.
07/6/14
M

OFFICE ORDER.

In pursuance of order of the appellate authority, the Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar issued under his office endst: No.3472-76/F.No.18/Vol: VI/PST (M) Malakand dated 27-05-2014, Mr. Nizamud Din PSHT is hereby adjusted against the vacant PSHT BPS-15 post at Govt: Primary school Shah Kot (Palai) from the date of his demotion.

However as per decision of the appellate authority his one annual increment is hereby stopped for the period of two years.

- Note:-
- 1.No TA/DA is allowed.
 - 2.Charge reports should be submitted to all concerned.
 - 3.Necessary entry to this effect should be made in his service book accordingly.

(SYED MANZAR JAN SAJID)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. 3076-81 /F.No. Corporal punishment/PSTs Dated 13-06 /2014.

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

1. The Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar w/r to his office order endst: No.3472-76/F.No.18/Vol: VI/PST (M) Malakand dated 27-05-2014. **The S.D.E.O. (M) Swat Ranizai at Batkhela.**
- 3 The District Accounts officer, Malakand.
43. The Assistant Programmer, DEMIS, Cell local office.
- 4-5. The Head teachers GPS, Haibat Gram and G.P.S. Shah Kot.
6. Mr. Nizamud Din PSHT BPS- 15 Govt: Primary school Shah Kot (Palai) District Malakand.

Received

DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

میں میں اسلم بادشاہ اور خان باجہ و کیدار GPS کی سرکاری
 صدر ٹوٹ اندر خان اور خان حلقہ بیان کرنا ہوں مہتاب
 فضل احمد صاحب DDO اور شہر بادشاہ H/M اور منٹ ہائی سکول کاغذ کا کوئی
 ٹھکانہ انوائس کے سلسلے میں سکول صفرائے۔ انٹون نے تکلم اردن
 H/T سکول صفرائے ایک سوالنامہ دیا جس کے جوابات دینے کے لئے
 اسے کیا۔ بلکہ تو وہ سوالنامہ لینے سے بچ گیا تھا، لیکن ان دو انوائس
 آفیسر نے اسے کیا کہ اب تک اسے سوالنامہ کے جوابات دے سکے ہیں۔
 لیکن اس نے سوالنامہ لینے سے قطعاً انکار کیا اور جواب دیا کہ میں
 سوالنامہ سے ڈرنا ہوں اس لئے جوابات نہیں دے سکتا،
 میری موجودگی میں اس نے سوالنامہ لینے سے انکار کیا۔

اسلام آباد
 21-3-13
 اسلم بادشاہ

و کیدار GPS میں صدر

Dear Mr. [Name] [Address]

I am writing to you regarding the [subject] [details]

I am writing to you regarding the [subject] [details]

I am writing to you regarding the [subject] [details]

I am writing to you regarding the [subject] [details]

NIZAM UD DIN HT GPS JALALKOT

سوال نمبر 1 - وضاحت کریں کہ ڈی ای او اور ڈی ای او صاحب سکول
 کیا ہیں اور آپ کو ان کو اس کے سید سے سوال نامہ دینا
 ہے۔ اس کی وضاحت اس کے آپ نے 2011 دہلی کے صدف
 کاروائی محل میں لائی جائے۔

سوال نمبر 2 - آج کل کے معروف طالب علم مسٹی سائل وار شریں باجا
 کو صحابی طور پر جیک کیا تو اس کے ٹخنے پر بڑی بندھی ہوئی تھی
 اور وہ جڑی اڑنڈے کے سپار سنگھڑا بنا ہوا چلتا ہے۔
 معروف طالب علم کے بیان کے مطابق اسی کا جرم یہ تھا کہ وہ پھر
 اسی پر بیٹھا ہوا تھا۔ اگلے دن طلباء کو بھی آپ نے اسی
 جڑی اڑنڈے سے ایک بار ڈنڈے مارے تھے جن کے نام یہ ہیں۔

- 1) یاسر - 2) ساحر
- 3) ایمان اللہ
- 4) منیب خان
- 5) عمر علی

سوال نمبر 3 - جماعت دوم کے طالب علم حضرت حسین کے بیان کے مطابق اس نے
 ایشوں کا ڈنڈا لایا تھا وقوعہ کے روز آپ نے اسی ڈنڈے سے
 معروف بچہ دینر طلباء کو مارا تھا۔ اور آپ دینر طلباء کو بھی اسی
 ڈنڈے سے مارے تھے۔ تبین وقوعہ کے بعد آپ نے وہ ڈنڈا
 ٹوٹ لیا تھا اور آپ نے طلباء کو نہیں مارا تھا۔ اگلے دن اس کے
 حکم کے نام طلباء نے یہ بیان دیا کہ آپ اس کی وضاحت
 کریں کہ اس میں کتنی صداقت ہے؟

21-08-13
 Faraz Akbar
 ODEO. Ed. MKD
 Chairman, Inquiry
 Committee

21/8/13
 HTM GHS CC
 Jhama