BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

APPEAL No 1372 OF 2022

2943

Muhammad Nabi, Ex-Chowkidar (BPS-01) GGPS Segloo Seo, Kohistan 13-1-2023

Appellant

VERSUS

- 1. The Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. The District Education Officer (F), District Kohistan, Khyber Pakhtunkhwa, Peshawar.

Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1,2 & 3.

INDEX

S#	Particulars of documents	Annexure	Pages
1	Comments along with affidavit		1-4
2	Copy of ASDEO report, show cause notice, and compulsory retirement order etc	"A"	5-13
3	Copy of rejection of appeal	"B"	14

Dated 03 -01-2023

Respondent No. 3

District Education Officer,

√ (Female) Kohistan Upper



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

APPEAL No 1372 OF 2022

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Appellant

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- 1. The Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. The District Education Officer (F), District Kohistan, Khyber Pakhtunkhwa, Peshawar.

Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1,2 & 3. Respectfully Sheweth:

PRI LIMINARY OBJECTIONS:-

- I. That the appellant has no cause of action/locus standi to file the instant appeal.
- II. That the appellant has concealed the material facts from the honorable tribunal
- III. That the appellant has not come to this honorable tribunal with clean hands.
- IV. That the appellant has filed the instant appeal on malafide grounds.
- V. That the appeal is against the prevailing law and rule.
- VI. That the appellant is estopped by his own conduct to file instant appeal.
- VII. That the claim of the appellant is unlawful, hence the appeal is liable to dismissed

Factual Objections:

- 1. Para No.1 of the appeal relates to appellant's service record, hence no comment.
- 2. Para No.2 of the appeal relates to appellant's service record, hence no comment.
- 3. Para No.3 of the appeal relates to appellant's service record, hence no comment.
- 4. Para No.4 is incorrect hence denied as the appellant has been treated as per rule and law, that the appellant was found absent by the ADEO circle. Show cause notice was served to the appellant, but the appellant neither joined his duty nor



submitted convincing replies within a stipulated time period. That after fulfillment of all Codal formalities the respondent issued his compulsory retirement order on 19-09-2021.

(Copy of ADEO reports, Show Cause notice and compulsory retirement order is annexed as "annexure A").

5. Para No.5 is incorrect, hence denied as the appellant did not submit appeal before the appellate authority in time. His appeal is badly time barred and the authority rejected his appeal.

(Copy of appeal rejection by the authority is annexed as "annexure B").

6. Para No.6 that the appellant is not aggrieved one, his appeal is badly time barred, and the appellant did not come to this tribunal with clean hands, hence liable to be dismissed with cost.

GROUNDS

- A). Para of the ground 'A' is incorrect, hence denied as the appellant has been treated as per rule and law. A detail reply has been given in Para No.4 & 5 of factual objection.
- B). Para of the ground 'B' is incorrect. Detail reply has been given in Para 4 & 5 of factual objections.
- C). Para of the ground 'C' is incorrect hence denied as the reply is given in Para No.5 of factual objections.
- D). Para of the ground 'D' is incorrect hence denied as the reply is given in above Para. No.4 of factual objections.
- E). Para of the ground 'E' is incorrect hence denied as the respondent has issued the show cause notice to the appellant and ASDEO circle also reported him as absent from his duty.
- F). Para of the ground 'F' is incorrect. The impugned order is according to law and rule.
- G). Para of the ground 'G' is incorrect hence denied as stated above Para No.4 & 5 of factual objections.
- H). That the respondents seek permission to advance other grounds and proofs at the time of hearing.

It is therefore, in the light of above stated facts and circumstances. It is Very humbly prayed that appeal being badly time barred and devoid of merit may please be dismissed with cost.

> Respondent No. 3 District Education Officer,

(Female) Kohistan Upper

Respondent No.2

DIRECTOR

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Secretary,

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

APPEAL No 1372 OF 2022

Muhammad Nabi, Ex-Chowkidar (BPS-01) GGPS Segloo Seo, Kohistan

Appellant

VERSUS

- 1. The Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. The District Education Officer (F), District Kohistan, Khyber Pakhtunkhwa, Peshawar.

Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1,2 & 3..

AFFIDAVIT

I, Mr. Shah Wali Ullah representative on behalf of the DEO (F) Kohistan Upper is hereby solemnly affirm and declare that the contents of foregoing comments of the appeal No.1372/2022 titled Muhammad Nabi Versus Govt: of KPK are true and correct to the best of my knowledge and belief and nothing is being suppressed from the honorable tribunal.

DEPONENT

_

Abdur Rashid Adv





OFFICE OF THE ASSISTANT SUB DIVISOINAL EDUCATION OFFICE (F) KANDIA KOHISTAN UPPER

No.	/ASDEO (F) KH Dated Dassu th	e/2021
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TO

The Sub Divisional Education Officer (Female) Dassu Kohistan

Subject: - Visit Report of ASDEO (F) Circle Seo Kandia for the month of 05/2021

SiNo	Dated	Name of	Observation	Remarks
	1	School	1	
1	24 05-2021	GGPS Kai	During my surprise visa the said school was	Surprise
	ŀ	Rustom	again found closed there were no teaching staff	Visit
		Ahad	nor the class IV. As the detail of teaching and	
			non-teaching are staff as under	
1	1		1. Mst. Maryam Bibi PST (Absent)	
ļ		1	2. Mst: Samina Kosar PST (Absent)	J' ·
	!		2. Mst. Somino Kosar PST (Absent) 3. Mst. Aniiu Babar PST (Absent) - Remove 4. Mr. Shah Nawaz, Chowkidar (Absent)	
1	ļ	1		
	}		Report are already has been submitted dated on	
† 1		1	29 March 2021. But not take action The undersigned paid a surprise visit of said	Surprise
[2	25/05/2021	GGPS	school was found closed Msi Gul Nasreen SPST	Visit
1	j	Kuz	was on leave due to her son fixture of leg and	1
1		Kamila	the second CMLE Upenital in Rawalandi Wang	
		1	Taken transport Anims PS SHI COMO BUSCH AGO.	SIC 1840-11 -
ļ	ì		The same of the Contract with the property of the contract of	3127
1			Report are submitted already for your perusal and	
1		1	- ui alone	
	_	GGPS	the school was think	Surprise Visit
13	26/05/2021	Seglad	1	VISI
1	ı	Signe	*** The Part of the Color of th	
ļ	}		The result Absent from their duties of the	
1	\$	$+\sqrt{-}$	i i i i i i i i i i i i i i i i i i i	
į			The second of the angle of the second of the	
-		1	Note: Aluera Gul Pst Apply for retirement and	
ļ	1	1	Note: After that 15t Apply to Office female case was under process in DEO Office female	Surprise
-	26/05/2021	GGPS	The undersigned visit of the said school was found oyal: closed. Mst. Kalsoom Bibi Pst Mst	Visit
4	201031202	Tayyab	found oyal : closed, Mist. Karsonin old Khan were :Asma Saif. Pst & Cass IV Mr. imman Khan were	
1		Abad	:Asma Saif Pst & Cass IV vol manady report has found about farm their duties already report has	1
- {	l	/	been safe. Addated on 01/04/2021 28/04/202	
1	1	11/	but not serious again said staff.	
k L			troping the for relifement and the	ic
1		1	Note: \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
- 1	,		was on the close.	

Report is submitted for further necessary activationse

ASDEO (F) SEO Kandia Kohistan

29/05/202





OFFICE OF THE ASSISTANT SUB DIVISOINAL EDUCATION OFFICE (F) KANDIA KOHISTAN UPPER

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No/ASDEO (F) KH Daled Dassu the	

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The Sub Divisional Education Officer (Female) Dassu Kohistan

Subject: - Visit Report of ASDEQ (F) Circle Sea Kandin for the month of 06/2021

				Remarks		
Va.	Dated	Nume of	Observation			/
3	02-66-2021	GGPS Segle	There gold a unprise with the said school was closed about and again choice. There are no seaching staff and not the class IV. My line surprise visit the said school was also found closed dated on 2844-2(21, 26-08-2021 but not take school was also found the Choice of the wird school are as under	1	1	
	l :	1		ł	 	the state of
	1	1	1. Mrt. Patien Helann 151 (72/517) (A)	1	Į	1
	Į.	į	1 2 Marri Gui PST (3/1940) 151	. \	Į.	***
			Sit Mithamirad Nahi Cluss IV (43976); were touch access to duffer without intrinsing of the office. And reports me already submitted for your perusal and necessary section.	' 		
	•		Note Mustrit Gul PST applied for retirement and case was under process in DLC Office Mustrit Gul PST applied for retirement and case was under process in DLC Office			3.
		1		, , , , , , , , , , , , , , , , , , , ,	1550-1	0.0
	0249-2021	GCPS Tayub	female Ouring my surprise visit the Class IV Me Ingan Khin was present in the school Ouring my surprise visit the Class IV Me Ingan Khin was present in the school while the feaching staff namely Nat Kaisson Bits 153 (* 2052). Met Anna hait while the feaching staff namely method into an another of the class (*).	Visit	514	
	1 (12-22-2-1	Abol	while the teaching that manner with wheelt without intimation of the office the	" }	1	,
		ļ			` \	1
	1	Ì			1	
		1	SATE NEWSTRAND 23 PQ 2 PARTY NO. 11		_}	•
	1		The state of the s	1	1	;
3	07-06-21721	GGPS Thora	During my surprise visu the eard school was again feath a said a food was also teaching shall and not class IV My last surprise Visa the said a food was also teaching shall and not class IV My last surprise Visa the said shall are as and	ie i	1	
,	1	1		11/	^ }	
	. [l l	Mai Gill Mile 12 (Maria) Aband		l	, ; .
	1]		ed \	}	7.
	- (ĺ	2. Mr Ajah Khan Class IV (237285) Absent 3. Mr Ajah Khan Class IV (237285) Absent Showcase noticed already (sazed dated on 3 8th 2021 that not intensit and serious to given reply up till now it is humbly requested to lake to and serious to given reply up till now it is humbly requested to lake to	prict)	\ \ \
	ļ		and exigning the first relative of	Supri	<u> </u>	
	Ì		A constant agent of this telephot was firstly agent of the first of the	a Visti	\	4
i ·	07-06-2021	GGPS Kara		losca]	1	₩ 37 *4
	1		L. A. Carlot Harris (IUI) COUNTY Constitution of the constitution	A mitte	}	T.
		1			l	
		ŀ	written statement that the off school staff permanently obsert many years written statement that the off school staff permanently observed into this many community are ugain requested higher authorities to pleasarook into this many community are ugain to choose 50 the female's students can get proper		ļ	
	}	1	Land and the state of the state		1	₩ 22
	Î		education. The monitoring team is not reported about sendor started education. The My last report already submitted for your perusal and necessary action. The	מבנחוו	_\	1
		1	of the said school staff are by under	١.		
	l l	ļ		16		1
	İ		2 Mar Shiniani Allyan I all and a share of the same	. 1	1	∮ %
			3. Mr Muhammad Kabir Class IV (331749) (Artische) Therefore, it is humbly requested to take strict neuran above mentioned so	Tunde:	,	
	1	Ì	the E&D rule 2011	\	\ \	ję.
	Į		A harmin circumstance of the contract of the c	ti school St	anntice:	į
		GGPS	At the time of my surprise visit the said school was found again closed. A staff were absent from their duties since long time without intimation of the staff were absent from their duties since long time without intimation of the staff were absent from their physically school building was found	broffice V	rsit i	- 1
5	10-06-2021	KhelGabri	at off were absent from their unites sales to the anti-	worst in	. /	20
:	t	,	and also school record was missing physically school commune was condition. My last SQMI visit the said school was also found closed dates condition. My last SQMI visit the said school was also found closed dates.	on 14-		;
•	- 1	1	condition. My last SQMI visit the said section and absent staff. Letted community 04-2021 but not take action against the said absent staff parentally absent	ily.	ļ	1
ţ	1	1	04-2021 but not take action against the 210 action staff parentally absent yerbally and written statement that the all school staff parentally absent yerbally and written statement that the all school staff parentally absent	many		
	1		vesis. And further reported our tental community again red	uested to	\	
1	ì	1	and also contained william getting contained and arte option and arter of a land	these staff	1	
1	•		higher authorities to please took into this mater and take accounting to an So the female students can get proper education. Monitoring team is no	E VISIT CUT		Λ
;			So the female students can get proper contains a school and not education department.	}		M_{\star}
١			The destit of the school statt are as under		• '	17
1	1	İ	Mes-Nagreen Ribi PST (436446) Absent			11 3
1	ļ	ł	2 Afri: Multrat Night PST (334845) (A)			1 " Vic.
!		1	3. Man.: Abida Ishini PST (499179) (A)			NE 1. 131
i	, *	1	4. Mr. Muhammad Dawood Class IV (Present)	staff undet	. ZZZ Y	20012
į			4. Mr. Muhammad Dayond Class IV (Present) Therefore it is humbly requested to take strict action about the absent the E&D rule 2011. My last reports already submitted for perusal and	uccenimit.	, 12.	0 5 0 1/21 0 5 0 0 1/21
ź	l	1	The Cocks like Lay 1. 1. 1.		67	14.
1	1	I	nction.			





OFFICE OF THE ASSISTANT SUB DIVISOINAL EDUCATION OFFICE (F) KANDIA KOHISTAN UPPER

No	/ASDEO (F) KH Dated Dassu the	
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70

The Sub Divisional Education Officer (Female) Dassu Kohistan.

Subject. - Visit Report of ASDEO (F) Circle Seo Kandia for the month of 05/2021

	Instal	Name of	Observation	marks
S/No	Dated	School		
1	24/05/2021	GGPS Kai	again found clused there were no teaching staff	isprise Isit
		Abad	nor the class IV. As the detail of teaching and	1 _
	i .	/	non-teaching are staff as under	1
		\ \	1. Mst: Maryum Bibi PST (Absent)	
			2. Mst Semina Kosar PST (Absent)	
	1		2. Mst. Samina Kosar PST (Absent) 3. Mst. Anila Babar PST (Absent) 4. Mr. Shah Nawaz, Chowkidar (Absent)	_ i
		1	Report are already has been submitted dated on	
			20 March 2021 But not take action	
2	125/05/2021	GGPS	"The ordersioned paid a surprise visit of 5aid	Surprise Visit
£	13/04/2041	Kuz	school was found closed Mist Gul Nasteen 3721	`'''' .
	1	Komila	was on leave due to her son fixture of leg and	
		/	admitted CMH Hospital in Rowalpindi while	incom. I f
			MST Maryam Anwar PST still found absent from their duty w.c.f. 1 October 2020 to up till now.	512 1880 cef
	ļ	~	Report are submitted already for your perusal and	-
	ł	1	l =	
		GGPS	the school was loude	Surprise
3	26/05/2021			Visit
	1	Segloo	to the man fill bet & Class IV Mr. Minianimo	
		1	Alobi user found Absent from their diffics of also	1 - 1
	1		1) i
<u> </u>			28/04/2071 but not take action against said staff.	1
1		1	Note: Muse - Gul Pst Apply for retirement and	1
			case was under process in DEO Office female	Surprise
4	26/05/2021	GGPS	The undersigned visit of the said school was found again closed. Mst. Kalsoom Bibi Pst Mst.	Visit
l		Tayyab	Asma Sail Pat & Cass IV Mr. Imran Khan were	
1	}	Abad	found the - form their duties already report has	.
		1	from are dated on 01/04/2021 28/04/202	1
l	l	$1 \mathcal{M}$	but notsion again said staff.	l
	1	"	Note: " "if I'st apply for retirement and cas	ic
	1		was under a rocess in DEO Office Female.	
1	1	1	Milk min. 1	

Report is submitted for further necessary active strase

ASDEO (F) SEO Kandla Kohistan

29/15/20

Va





OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email:Dofemalekohistanupper@gimail.com- 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency& Disciplinary, Rules 2011, do hereby serve upon you, Mr. Muhammad Kabir Chowkidar GGPS Karang for the following charges;

- As per report of SDEO/ ASDEO Circle Seo Kandia on 07-06-2021 and 13-04-2021 you willfully remained absent from your duty and school was found closed without proper permission/intimation or leave.
- 2. Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
- 3. Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one are more penalties in sub rule No.4(a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you.

(Muhammad Amin)
District Education Officer (F)
Kohistan Upper.

Endorsement No. 4482-87 Dated: 02/08/2021.

Copies for information and necessary action forwarded to the:

- 1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. The Deputy Commissioner Kohistan Upper.
- 3. The PA to District Education Officer (F) Kohistan Upper.
- 4. The Deputy District Education Officer (F) Dassu, Kohistan Upper.
- 5. Mr. Muhammad Kabir Chowkidar GGPS Karang .
- 6. Copy to Master File for record.

District Education Officer (F)

Kohistan Upper.

Acknowledgment: I______received my copy.

Signature: ______ Date: _____







FICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email: Dofemalekohistanupper@gimail.com- 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency& Disciplinary, Rules 2011, do hereby serve upon you, Mr, Ajab Khan Chowkidar GGPS Thooti for the following charges;

- 1. As per report of SDEO/ ASDEO Circle Seo Kandia on 07-06-2021 and 04-05-2021 you willfully remained absent from your duty and school was found closed without proper permission/intimation or leave.
- 2. Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
- 3. Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one are more penalties in sub rule No.4(a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you.

> (Muhammad Amin) District Education Officer (F) Kohistan Upper.

Endorsement No. 4164-68

Copies for information and necessary action forwarded to the:

- 1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. The Deputy Commissioner Kohistan Upper.
- 3. The PA to District Education Officer (F) Kohistan Upper.
- 4. The Deputy District Education Officer (F) Dassu, Kohistan Upper.
- 5. Mr, Ajab Khan Chowkidar GGPS Thooti .
- 6. Copy to Master File for record.

District/Education Officer (F)

Kohistan Upper.4 received my copy.

Acknowledgment: I_____ Signature:



FFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email: Dofemalekohistanupper@gimail.com- 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency& Disciplinary, Rules 2011, do hereby serve upon you, Mr. Imran Khan Chowkidar GGPS Tayab Abad for the following charges;

- 1. As per report of SDEO/ ASDEO Circle Dassu on 14-07-2021 you willfully remained absent from your duty since long and up to till now without proper permission/intimation or leave and show cause notice has already issued vide this office endorsement No.4217-22 dated 02-08-2021,
- 2. Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
- 3. Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one are more penalties in sub rule No.4 (a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you. (Muhammad Amin)

District Education Officer (F) Kohistan Upper. Dated: 07/9//2021. Endorsement No. 4509-15 Copies for information and necessary action forwarded to the: 1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. 2. The Deputy Commissioner Kohistan Upper. 3. The PA to District Education Officer (F) Kohistan Upper. 4. The Deputy District Education Officer (F) Dassu, Kohistan Upper. 5. Mr. Imran Khan Chowkidar GGPS Tayab Abad . Copy to Master File for record. District Education Officer (F Kohistan Upper. received my copy. Acknowledgment: I





OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email: Dofemalekohistanupper@gimail.com- 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency& Disciplinary, Rules 2011, do hereby serve upon you, Mr.Muhammad Nabi Chowkidar GGPS Segloo for the following charges;

- As per report of SDEO/ ASDEO Circle Dassu on 14-07-2021 you willfully remained absent from your duty since long and up to till now without proper permission/intimation or leave and show cause notice has already issued vide this office endorsement No.4152-57 dated 02-08-2021,
- Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
- Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one are more penalties in sub rule No.4 (a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you.

(Muhammad Amin)
District Education Officer (F)
Kohistan Upper.

Endorsement No. 1598-39
Dated: 07/09//2021.

Copies for information and necessary action forwarded to the:

- 1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. The Deputy Commissioner Kohistan Upper.
- 3. The PA to District Education Officer (F) Kohistan Upper.
- 4. The Deputy District Education Officer (F) Dassu, Kohistan Upper.
- 5. Mr. Muhammad Nabi Chowkidar GGPS Segloo .

6. Copy to Master File for record.

District Education Officer (F)

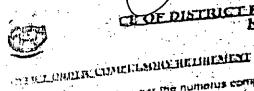
Kohistan Upper.

received my copy.

Date: 8/9/2001

J/C 100 10

Acknowledgment: I





WHEREAS 27 Fer the numerus complaints received to the undersigned through the colour series (see the following through the colour series) WHEREAS as per me numerus complaints N WHEREAS THE STREET PRINTING COSCINON-IUNCIONAL during the repeated.

WHEREAS TO WE'M reported absent by EMA time and again during the Visits of The

WHEREAS THE Full their lake attendance in the school registers at their home.

WHEREAS THE COncern of ASOEOs were directed to verify their abadementary.

TWHEREAS The concerned ASDEOs confirmed/veilled their absentedism as per their

TO WHEREAS are cause notices were assed to them wide the references made against

SE WHEREAS they falled to raply their show cause throoming big raply within the stipulated

25 WHEREAS they falled to avail the chance of personal hearing.

Therefore the undersigned being the compotent subjectly, do hereby knoose Major Penalty of Compulsory Retirement, upon the following Chemicals under Rule 4(b) B. of E&D. Ruce 202 . . an immediate affect, in the interest of public service.

	Name of Teacher with	Name of School,	Show cause	Remarks
J. 1 4 4	Muhammad Şabi	GGPS Sinloo	No.4152-57 dated 02/08/2021	
· ·	Chow Ajab Khan Chow	GGPS Thood	No.4164-69 dated:02/08/2021	
	Muhammad Kabit	GGPS Karang	No.4182-87 dated:07/08/2021	
Ì	Chow Ingran Khan Chow	GGPS Tayyab	No.4217-22 dated-02/08/2021	

MUHAMMAD AMN District Education Offic (Female) Kohistan

666 DED (F) KH Dand Endst. No.

01. PS to Secretary Elementary & Secondary entirellien Department KPK Pentinway

072 PA to Director Elementary & Senoratory Education KITA Pethawaie.

CI. Deputy Concentiationer Kobiston Upper.

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service books

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ct Education Officer (Female) Kohistan



OFFICE OF THE DISTRICT EDUCATION OFFICER KOHISTAN

OFFICE ORDER COMPULSORY RETIREMENT.

- 01. WHEREAS per the numerous complaint received to the undersigned through various means the following chowkidar remained absent from their duties without any prior permission of leave for several years.
- 02. WHEREAS their school remained close/non-functional during the repeated visits of EMAL
- 03. WHEREAS they were report absent by EMA time and again during the visits of concerned DCMAs.
- 04. WHEREAS they put their fake attendance in the school registers at their home.
- 05. WHEREAS the concerned ASDEOs were directed to verify their absenteeism.
- 06. WHEREAS the concerned ASDEOs confirmed/verified their absenteeism as per their report.
- 07. WHEREAS show cause notices were issued to them vide the references made against their names.
- 08. WHEREAS they failed to reply their show causes/inconvincible reply within the stipulated period.
- 09. WHEREAS they failed to avail the chance of personal hearing.

Therefore the undersigned being the competent authority do hereby impose

Major Penalty of Compulsory Retirement upon the following Chowkidars under Rules 4(b) ii

of E&D Rules, 2011 with immediate effect, in the interest of public service.

\$.Ņ	Name of Teacher with designation	Name of School	Show Cause	Remarks
1 .	Muhammad Nabi Chow	GGPS Siglio	No.4152-57 Dated:02/08/2021	
2	Ajab Khan Chow	GGPS Thooti	No.4164-69 Dated:02/08/2021	
3	Muhammad Kabir Chow	GGPS Karang	No.4182-87 Dated:02/08/2021	
4	Imran Khan Chow	GGPS Tayyab Abad	No.4217-22 Dated:02/08/2021	

MUHAMMAD AMN
District Education Officer
(Female) Kohistan

Endst: No. <u>4597-4606/DEO(F)KH</u>

DATED: 09/09/2021







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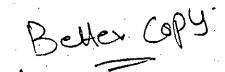
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(14)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

No. _____/F.No.291/A-20/C-IV/Kohistan/Vol-5-6

Dated Peshawar the 05/09/2022

To.

The District Education Officer, (Female) Kohistan.

Subject:

APPEAL FOR RE-INSTATEMENT.

Memo:

I am directed to refer to the subject cited above and to state that the appeal in r/o Muhammad Naboii S/o Jamdad Ex-Chowkidar GGPS Saglo Kohistan Upper, Mr. Imran Khan S/o Khusra Ex-Chowkidar GGPS Tayyab abad Kohistan and Ajab Khan S/o Khan Badshah Ex-Chowkidar GGPS Thooti Kohistan & Muhammad Kabir Chowkidar has been examined/analyzed by this office. Hence inform the appellant concerned that their appeals have been rejected by the appellate authority.

Assistant Director (Admn)

Directorate E& Secondary Education

Khyber Pakhtunkhwa, Peshawar

Endst: No. 1265-66/