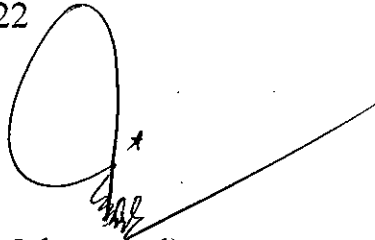


ORDER  
15.09.2022

Appellant alongwith his counsel present. Mr. Hussain Ali, ADEO alongwith Mr. Muhammad Riaz Khan Pindakhel, Assistant Advocate General for the respondents present. Arguments have already been heard and record perused.

Vide our detailed judgment of today, placed on file of Service Appeal bearing No. 275/2020 titled "Abdul Salam Versus The District Education Officer (Male) Elementary and Secondary Education Swat and 09 others" the appeal in hand is accepted by setting aside the impugned orders and the appellant is reinstated in service for the purpose of de-novo inquiry. Respondents are directed to conduct de-novo inquiry in the matter strictly in accordance with law and rules in the prescribed manner and laid down procedure under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, within a period of 60 days from the date of receipt of copy of this judgment. Needless to mention that the appellant shall be fully associated with the inquiry proceedings by providing him fair opportunity of defending himself. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
15.09.2022



(Mian Muhammad)  
Member (Executive)



(Salah-Ud-Din)  
Member (Judicial)

3.8.22

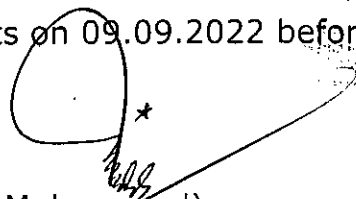
Due to seasonal vacation the case is adjourned to 8.9.22 for the bench.



08.09.2022

Appellant alongwith his counsel present. Mr. Hussain Ali, ADEO (Litigation) alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Partial arguments heard. To come up for remaining arguments on 09.09.2022 before the D.B at Camp Court Swat.



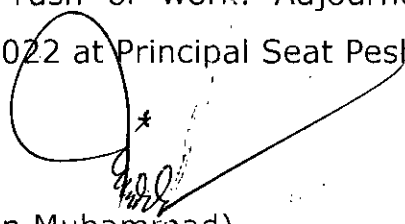
(Mian Muhammad)  
Member (Executive)  
Camp Court Swat

(Salah-Ud-Din)  
Member (Judicial)  
Camp Court Swat

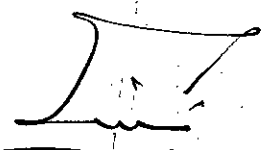
09.09.2022

Appellant alongwith his counsel present. Mr. Hussain Ali, ADEO (Litigation) alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Arguments heard, however order could not be announced due to rush of work. Adjourned. To come up for order on 15.09.2022 at Principal Seat Peshawar.



(Mian Muhammad)  
Member (Executive)  
Camp Court Swat

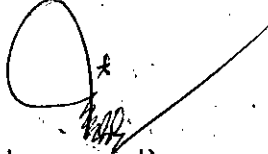


(Salah-Ud-Din)  
Member (Judicial)  
Camp Court Swat

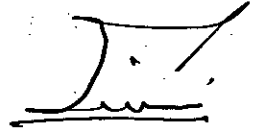
10.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for official respondents No. 1 to 3 present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments today. Adjourned. To come up for arguments on 08.06.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)  
Member (E)  
Camp Court Swat




(Salah-ud-Din)  
Member (J)  
Camp Court Swat

8<sup>th</sup> June, 2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Counsel are on strike. To come up for arguments on 06.07.2022 before the D.B at camp court Swat.



(Mian Muhammad)  
Member(E)




(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

07.07.2022

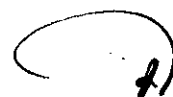
Appellant present through counsel.

Noor Zaman Khan Khattak, learned District Attorney for respondents present.

Former made a request for adjournment as he has not prepared the brief. Adjourned. To come up for arguments on 03.08.2022 before D.B at Camp Court, Swat.



(Fareeha Paul)  
Member(E)  
Camp Court, Swat

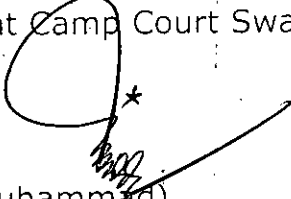



(Rozina Rehman)  
Member (J)  
Camp Court, Swat

05.01.2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 to 3 present. Private respondents No. 5 to 9 also present.

Learned counsel for the appellant requested that time may be granted to him for submission of rejoinder. Adjourned. To come up for rejoinder as well as arguments before the D.B on 07.03.2022 at Camp Court Swat.

  
(Mian Muhammad)  
Member (E)  
Camp Court Swat

  
(Salah-ud-Din)  
Member (J)  
Camp Court Swat

07.03.2022

Due to retirement of the Hon'ble Chairman, the case is adjourned to 09.05.2022 for the same as before.

Reader

09.05.2022

Due to non-availability of the Bench, the case is adjourned to 10.05.2022 for the same as before.

Reader

P.S

23.09.2021


Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.

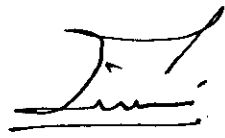
  
Chairman

03.11.2021

Appellant alongwith his counsel present. Mr. Aziz Ahmed, PST alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 to 3 present. Private respondents No. 5 to 9 in person present.

Written replies/comments on behalf of official respondents No. 1 to 3 as well as private respondents No. 5, 7, 8 & 9 have already been submitted, while private respondent No. 6 submitted reply today, which is placed on file. None present on behalf of respondent No. 4, hence he is placed ex-parte. To come up for rejoinder, if any, as well as arguments before the D.B on 05.01.2022 at Camp Court Swat.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court Swat

  
(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

07/04/2021

Due to COVID-19, the case is adjourned to

09/06/2021 for the same.

  
READER

26.07.2021

To come up for written reply/comments of respondents No. 6 to 9 on 25.08.2021 before S.B at Camp Court, Swat. Notices be issued to appellant/counsel as well as respondents for the date fixed.

  
Chairman

25.08.2021

Appellant with counsel and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Hussain Ali, ADEO for official respondents No. 1 to 3 and respondents No. 7 to 9 in person present. Nemo for respondents No. 4 and 6.

Reply submitted by respondents No. 7, 8 and 9. Fresh notices be issued to respondents No. 4 & 6 through registered post. Respondents No. 4 & 6 are directed to submit written reply/comments in office at Peshawar within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.11.2021 before the D.B, at camp court Swat.

*Stipulated period has passed and reply has not been submitted*

  
Chairman  
Camp Court Swat.

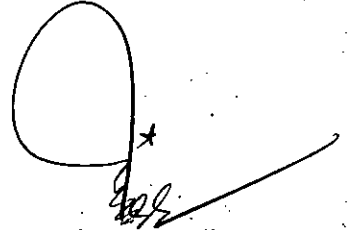
01.02.2021

Appellant in person parties.

Muhammad Riaz Khan Paindakhel, Assistant Advocate General for respondents is present.

As the case was adjourned previously on the Reader note, therefore, notices be issued to the respondents.

Adjourned to 02.03.2021 before S.B at camp court Swat.



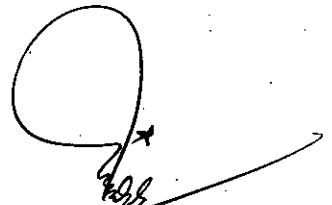
(Mian Muhammad)  
Member(E)  
Camp Court Swat

02.03.2021

Appellant in person present. Mr. Noor Zaman, District Attorney alongwith Mr. Hussain Ali, Assistant Litigation for official respondents No. 1 to 4, Private respondents No. 5,6,7 and 8 in person present.

Written reply on behalf of official respondents No. 1 to 4 and private respondent No. 05 submitted which is placed on file. Private respondent No. 6,7,8 seeks time to submit the same on the next date. Notices be issued to the private respondents No. 9 for submission of written reply.

Adjourned to 07.04.2021 before S.B at camp court Swat.



(Mian Muhammad)  
Member(E)  
Camp Court Swat

10.09.2020

Appellant alongwith counsel present. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 02.11.2020 before S.B

Appellant Deposited  
Security & Process Fee

10/9/20

Member (J)  
Camp Court, Swat

02.11.2020

Appellant in person present. Mr. Muhammad Jan learned DDA alongwith Bakht Rehman Litigation Officer on behalf of official respondents No. 1 to 4 and private respondents No. 6 to 9 for respondents present.

Representatives of official respondents No. 1 to 4 and private respondents No. 6 to 9 seeks time to submit written reply/comments. Time was sought. To come up for written reply/comments on 07.12.2020 before S.B at Camp Court, Swat.

Member (E)  
Camp Court, Swat

07.12.2020

Due to COVID-19, case is adjourned to 01.02.2021 for the same as before.

Reader





BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTON KHAWA PESHAWAR

APPEAL NO 1719 /2020

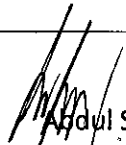
Abdul Salam C.T Government High School Beha Swat .....Appellant.

VESSUES..

1. District Education officer Male Elementary and secondary Education Swat & others.....Respondents.

INDEX

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3	Memo of addresses.		9
4	Promotion to PHST BPS 15.	A	10-14/A
5	Transfer order	B	15
6	Promotion order to C.T. BPS 16	C	16-18
7	Bank statements.	D	19-22
8	False complaint	E	23
9	Nomination of enquiry officer	F	24
10	Vouchers/bills	G	25-44
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12	Statements of Respondents No 7.8	I/J	52-53
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16	Show cause letter		63
17	Departmental appeal	N	64-65
18	Reply of show cause		66-69
19	Application for suspension of impugned order.		70-71
20	Waklat Name.		72.

  
Abdul Salam Appellant.

Through Umar Khitab Advocate District Courts Swat.

①

BEFORE THE SERVICE TRIBUNAL KHYBER  
PUKHTOON KHAWA PESHAWAR.

1719/20

Abdul Salam Ex CT Teacher Government High  
School Beha Matta Swat.....Appellant.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1857

Dated 13-3-2020

Versus.

1. The District Education Officer Male Elementary and Secondary Education Swat.
2. The Director Elementary and Secondary Education Khyber Pukhtoonkhawa Peshawar.
3. The Secretary Elementary and Secondary Education KP Peshawar.
4. Mr. Hamdidul Haq Principal Government High School Kanju Swat/ Inquiry Officer.
5. Muhammad Gul Headmaster Government High School Parrai Barikot Swat( EX ASDEO Matta circle)
6. Mr. Laiqqat Ali PHST Government Primary school Charai Beha Matta Swat.
7. Mr. Inatatur Rahman PST Government primary school Charai Beha Matta Swat.
8. Mr. Awal Khan chowkidar Government primary school Charai Beha Matta Swat.
9. Mr. Shah Dawran PHST Government primary school Mandoor Matta Swat.....Respondents.

Filed to-day

Registrar

13/3/2020

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL Act, 1974 AGAINST THE IMPUGNED ORDER NO.5066-72 DATED 28/11/2019 OF RESPONDENT NO,1 WHEREBY THE RESPONDENT NO,1 ILLEGALLY AND WITHOUT FOLLOWING SERVICES RULES AND LAWS OF LAND ISSUE THE ORDER REMOVAL FROM SERVICE OF THE APPELLANT.

**PRAYER IN APPEAL.**

On the acceptance of instant appeal the impugned order 5066-72 dated 28/11/2019 may kindly be declare null and void i.e the Removal from service and appellant may kindly be re instated from the date of Removal from service along with back benefits.

**RESPECTFULLY SHWETH.**

- 1.That the appellant performed his duty as primary school teacher with effect from 03/05/1992.
- 2.That the appellant performed his duty as PHST ( Primary Head school teacher) at Government primary school Charai Beha Matta Swat with effect from 14/11/2015( order of PHST as Annex: A)
- 3.That the appellant was transferred from Government primary school Charai Beha Matta Swat to Government primary school Aghal Matta Swat vide order No.181-182 dated 30/11/2017.9 Transfer order as Annex:B)

4. That the appellant was promoted to C.T ( BPS 15) post at Government High school Beha Matta Swat vide order No.13358 dated 28/2/2019( promotion order as Annex: C)

5. That the Respondent No.1 transfer various amounts to the appellant school( GPS Charai Beha Matta) the detail is listed below. Rs.21,000/- dated 10/2/2014 Rs.21,000/- dated 10/07/2014 Rs.5,62,000/- dated 18/3/2016 Rs.10,000/- dated 31/03/2016 Rs.10,000/ dated 18/03/2016 Rs.6,70,000/- dated 09/01/2017 Rs.1,60,000/- dated 09/01/2017. However the amount mention above was for the purpose of stationary, petty repair and other construction works.( Bank statement as Annex:D)

6. The appellant utilized amount 6,30,730/- under the rules with the consultation of parents teachers council(PTC) and spent the amount on petty repair and on other construction works.

7. That on the complaint of Respondent No.6 the Respondent No.1 appointed Respondent No.4 for the enquiry of allegation mention in the complaint. The enquiry conduct by the enquiry officer is against the law and have not fulfilled the requirements of enquiry.

( Complaint and appointment of enquiry officer are Annex:E/F/)

8. That the Respondent No 6 submitted false complaint against the appellant to High up of department. In fact the appellant having full proof in respect of the works

4

in the shape of receipts, vouchers, bills and minutes of the meeting of parents teachers council committee. The whole amount transferred to the Account of GPS Charai Beha Matta Swat was Rs.14.54.000/- in the whole amount the Rs.2,00,000/- were given under the direction of Respondent No. 5 to Respondent No.9 . While the Rs. 6.32.000/- were utilized by the Respondent No.7 while the remaining amount Rs.6,30,730/- were spent under the supervision of appellant. The amount Rs.6,30,730/- were utilize in the shape of petty repair and other construction works( bills, vouchers minutes of PTC committee are available on record.( voucher/bills and minutes are Annex:G/H)

9. The Respondent No.8 cash the amount of Rs.6,32,000/- from NBP Matta and handed over the amount to Respondent No.7 and utilize the amount. The statements of Respondents No.7 and 8 were recorded by the enquiry officer. The statements of both person fully supported the version of appellant. ( statements are Annex:I/J )

10. That the amount Rs.2,00,000/- was for the water supply scheme for GPS Charai Beha Matta Swat. But is pertained to be noted that the concern school did not need the water supply therefore, under the verbal direction of Respondent No.5 the cash amount Rs.2.00.000/ was given to Respondent No.9. But the enquiry officer did not take the statement of Respondent No.5 and 9.

5

11. The Respondent No.4 /Enquiry officer considered whole amount of both year 2014-15 and 2016-17 Rs.10,32,000/- which is include the amount Rs.5,62,000/- for the year 2014-15 and the amount of Rs.4,70,000/-for the year 2016-17. The above amount was for the construction of boundary wall while from the enquiry officer recommended for the recovery of Rs.99306/- from the appellant. Respondent No.7 received the amount Rs.6,32,000/- for the boundary wall out of Rs.10.32,000/- ( Enquiry Report as Annex:K)

12. That the appellant paid to Respondent No.7 for the boundary wall Rs.4,70,000/- and Rs.1,60,000/- for the group latrin(total Rs.6,32,000/). Therefore, the appellant have no concern with the amount Rs.6,32,000/- According to the statement No.7 is liable for the amount /Recovery.(Recovery letter as Annex:l)

13. That the Respondent No 4 /Enquiry officer stated in para No.8 of his enquiry about the amount Rs.6,32,000/-which is include the amount Rs.1,60,000/- for group literin . The enquiry officer recommended the recovery of Rs.48,720/- from the Respondent No. 7.

14. That the Respondent No, 4 / Enquiry officer stated in para No.9 about group literin of Rs.1,60,000/- and recommended Rs.1,50,000/- from the appellant. However, it is to be noted that group literin amount Rs.1,60,000/- is included in the total amount Rs.6,32,000/- The recovery of Rs.1,50,000/- from the appellant out of Rs.6,32,000/- is unjustified.

6

15. That the para No.10 of the Respondent No,4/ Enquiry officer is against the facts and laws. Because ASDEO(P&D) had no given to the appellant the amount Rs.2,00,000/- It is pertained to mention here the amount for water supply was given to Respondent No.9 on the verbal direction of Respondent No.5 by the appellant.

16. The Respondent No.1 issue the illegal order Removal from service of the appellant on the basis of un lawful enquiry conducted by the Respondent No.4. (impugned order as Annex: M )

17. The major punishment ( Removal from service) awarded by Respondent No,1 to the appellant is against the service laws and rules.

18. The appellant had already challenge the final order of the enquiry report in this Honorable Tribunal.

GROUND FOR APPEAL.

1. That the order of Respondent No,1 No,5066-72 dated 28/11/2019 is against the law and services laws.

2. That in the whole process the appellant remained condemned un heard.

3. That the appellant Departmental appeal have already submitted to Respondent No,2 vide post office receipt No,518 dated 03/12/2019. Annex: N )




7

4. That the calculation of Respondent No,4 is incorrect.

5. That the impugned order is against the law, rules and violation of fundamental law of land.


6. The appellant submitted the show cause reply to Respondent No. 1 vide Dairy No. 2655 dated 28/10/2019.( Annex:O)

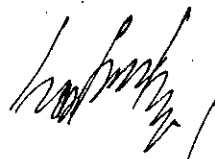
On acceptance of instant appeal the impugned order No, 5066-72 dated 28/11/2019 may kindly be declare null a void and set side (the Removal from service) and appellant may kindly be re instated from the date Removal from service along with back benefits.

  
Abdul Salam.....Appellant

CERTIFICATE.

It is certified that no such like appeal has earlier been filed by the appellant nor is pending or decided by this Honorable Tribunal.

  
Abdul Salam.....Appellant.

  
Uma Khiles Shobete  
Zawat

8

BEFORE THE SERVICE TRIBUNAL KHYBER PULHTOONKHAWA PESHAWAR.

Service appeal No \_\_\_\_\_/\_\_\_\_\_

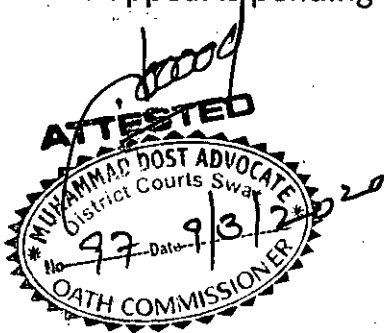
Mr. Abdul Salam C.T. Government High School Beha Matta Swat..... Appellant.

Versus.

1. District Education Officer ( Male) Saidu Sharif Swat & Others ...Respondents.

AFFADAVIT.

It is stated on oath that all the contents of this service appeal  
Are true and correct to the best knowledge and belief. Moreover, no such  
Like service appeal is pending before this Honorable Tribunal.



Deponent. \_\_\_\_\_

Abdul Salam

Government High School Beha Matta Swat.

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHW PESHAWAR.

SERVICE APPEAL NO \_\_\_\_\_/2019.

Abdul Salam C.T. Government High School Beha Matta Swat.....Appellant.

Versus.1. Government Khyber Pukhtoonkhw Through Secretary Elementary and Secondary Education  
Peshawar & other..... Respondents.MEMO OF ADDRESSES.Address of Appellant.

Abdul Salam C.T. Government High School Beha Matta Swat.

CNIC 15601 3966728-1

Cell No. 0343 2451522

Addresses of Respondents.

1. The District Education Officer( Male) gulkada saidu sharif Swat.
2. The Director Elementary and Secondary Education  
Khyber Pukhtoonkhw G.T. Road Peshawar.
3. Government of Khyber Pukhtoonkhw Through Secretary  
Elementary and Secondary Education Peshawar.
4. Mr. Hamidul Haq Principal Govt: High school Kanju Swat/ Enquiry officer.
5. Mr. Muhammad Gul Headmaster G.H.S. Parrai Barikot Swat( Ex A.S.D.E.O. Matta circle)
6. Mr. Laiqat Ali P.H.S.T. G.P.S. Charai Beha Matta Swat.
7. Mr. Inayatun Rahman P.S.T. G.P.S. Charai Beha Matta Swat.
8. Mr. Awal Khan chowkidar G.P.S. Charai Beha Matta Swat.
9. Mr. Shah Dawran P.S.T. G.P.S. Mandoor Matta Swat.

Appellant  
ThroughUmar Khitab  
Advocate

District Courts Gul Kada Saidu Sharif Swat.

Cell No. 0345 9377656

## OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER MALE DISTRICT SWAT AT

(10)

NOTIFICATION

Consequent upon the recommendation of departmental promotion committee and further approval of the competent authority the undersigned is pleased to issue on "School based" posting / adjustment orders of the following ST BPS-14 to PSHT BPS-15 (8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial government on the term and conditions given below with immediate effect.

S.No	SLN NO	Name of official	Present Posting		School where posted		Remarks Against vacant post
			GPS		GPS		
1	929	Said Mohd Khan	GPS	Shakaray	GPS	Sangar Managlor	---do---
2	930	Muhammad Ayub	GPS	Aligram	GPS	Reema	---do---
3	931	Shahir Ahmad	GPS	Kabal	GPS	Kham Dara	do
4	932	Mian Tahir Jan	GPS	Islah Pur Kalkata	GPS	Tour Kamar	---do---
5	933	Ashraf Ali	GPS	Manglor	GPS	Bodai Ghar	---do---
6	934	Sher Alam Khan	GPS	Kabal	GPS	Pir Patay Rangela bar Cham	---do---
7	935	Aziz Ahmad	GPS	Zara khela	GPS		---do---
8	936	Mian Said Ali Siyah	GPS	Balogram	GPS	Akharway	---do---
9	937	Bakht Mand	GPS	Chail Madyan	GPS	Chail	---do---
10	939	Asmat Ali	GPS	Nawakalay Mingora	GPS	Wara Sar	---do---
11	940	Bakht karim Jan	GPS	Sigram	GPS	Awar paty	---do---
12	941	Inayatullah	GPS	Khair Abad Kabal	GPS	Manja	do
13	942	Salim Javed	GPS	KhwajaAbad	GPS	Izbaka Muhammad Raig	---do---
14	943	Fazal ahad	GPS	Dherai	GPS		---do---
15	944	Anwar Ali Khan	GPS	Jamal Abad Sangota	GPS	Kandow Manglor	---do---
16	945	Afzal Khan	GPS	Shagai Sarchala	GPS	Ghai Banda	---do---
17	946	Maasam Khan	GPS	Gogdara	GPS	Poladay Malam	do
18	948	Ajmal Khan	GPS	Nagaha	GPS	Babat	---do---
19	949	Asadullah	GPS	Baawal Noor	GPS		---do---
20	950	Muhammad Shauib	GPS	Akhean Kalay	GPS	Painda Shah Gal Uttra	do
21	953	Aurang Zeb	GPS	Nagaha	GPS		do

Umar Khitab  
ADVOCATE

22	957	Abdul Hamid	GPS	Talsar Miandatu	GPS	Tal Sar	---do---
23	959	Gul Zamin Khan	GPS	Amankot	GPS	Jeloo	do
24	960	Muhammad Zada	GPS	Jalala	GPS	Sar	---do---
25	961	Amanullah	GPS	Islam Pur	GPS	Doshey	---do---
26	964	Muhd Naeem	GPS	Allgrama	GPS	Nemakai	---do---
27	965	Shamsul Hadi	GPS	Shagai Shahgram	GPS	Kargay	---do---
28	967	Muharak Ali	GPS	Konda	GPS	Bar Bangsh	---do---
29	968	Raham Karam	GPS	No.1 Fateh pur	GPS	Fateh pur No.1.	---do---
30	969	Kalim	GPS	Sirsanai #2	GPS	Mahak Jani Mar	---do---
31	970	Bakhti Ali	GPS	Qazi Abad	GPS		---do---
32	971	Muhammad Iqbal	GPS	Mingora No1	GPS	Nem cha Gharab Abad Bandara	do
33	973	Usman Ghani	GPS	Sambal Cham	GPS		---do---
34	974	Bakhat Minhaj Muhammad	GPS	Kabal	GPS	Tall	---do---
35	977	Tariq	GPS	Fazal Abad (B)	GPS	No.2.Nat maira Kani Utror	---do---
36	978	Sultan Akbar	GPS	Zwala	GPS	Samsary	---do---
37	979	Bakht Nawab	GPS	Chara Baba	GPS		---do---
38	981	Bakht Afsar Khan	GPS	Arkot	GPS	Arkot	---do---
39	982	Muhammad Iqbal	GPS	Kharkai Sakhra	GPS	Narai Banda	---do---
40	987	Muhammad Sadiq	GPS	Notmera	GPS	Ramoti Fazal Abad Gahlegay	do
41	988	Fawad Ali	GPS	Chra Bab Ghelegay	GPS		do
42	989	Muhammad Jan	GPS	Deolai No.1	GPS	Malakana Bawrai	---do---
43	990	Ihsanullah	GPS	Daro Gharai	GPS		---do---
44	991	Gowhar Ali	GPS	Bara Bamakhela	GPS	Dagai Matta	---do---
45	992	Muhammad Khan	GPS	Urdam	GPS	Bela Gabral	---do---
46	993	Sultanat Khan	GPS	Kokarai	GPS	Sangar No.1.	---do---
47	995	Ahmad Zeb	GPS	Spina Khpa	GPS	Baz Khela No.2.	---do---
48	996	Muhammad Salar	GPS	Sakhra	GPS	Bar Kabal Koo Batan Dar	---do---
49	997	Muhammad Iqbal	GPS	Balao	GPS		---do---
50	998	Habihur Rahman	GPS	Langar	GPS	Gojar Gabral	---do---

Umar Khitab  
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51	999	Muhammad Iqbal	GPS	Baidara No:2	GPS	Chatikal Matta	---do---
52	1000	Ghayasud Din	GPS	Pir Kalay	GPS	Archalai	---do---
53	1001	Zahir Shah	GPS	Tangai odigram	GPS	Khadang Gorkin	---do---
54	1002	Alim Khan	GPS	Kohay	GPS		---do---
55	1003	Tasnimul Haq	GPS	Bar Sher Palam#1	GPS	Ashray Awarai	---do---
56	1004	Sardar	GPS	Shangwatal Cham	GPS	Shor Shah Shawar	---do---
57	1005	Muhd Salim	GPS	Kaldar Khwar	GPS	Satal	---do---
58	1007	Bahadar Ali	GPS	Shalpin	GPS	Jeshar	---do---
59	1008	Abdus Salam	GPS	Qazi Abad	GPS	Charai Beha	---do---
60	1010	Wahid Zaman	GPS	Hakim Abad	GPS	Kharky Azad Banda	---do---
61	1011	Syed Burhanuddin	GPS	Pirawdai	GPS	Meramai	---do---
62	1012	Fazal Wahab	GPS	Asogay	GPS	Marpanai	---do---
63	1014	Tariq Ahmad	GPS	Balogram	GPS	Kuz Motlai	---do---
64	1015	Niaz	GPS	Spina Khpa	GPS	Narkat	---do---
65	1020	Tahirul Mulik	GPS	Landay kas	GPS	Koz Bargin	---do---
66	1024	Rahman Ali	GPS	2 Chamtalai	GPS	Bar Kedam	---do---
67	1026	Akbar Shah	GPS	NawanKalay k/k	GPS	Jaba Pisal	---do---
68	1032	Haq Nawaz	GPS	Barawal No:2	GPS	Sar Banda	---do---
69	1033	Sayed Hassan Shah	GPS	Wali Abad	GPS	Tamba Gat	---do---
70	1034	Amanullah Khan	GPS	Daro Gharai	GPS	Zor Chail	---do---
71	1035	Aleem Shah	GPS	Meramai	GPS	Madiyat	---do---
72	1037	Sher Malik	GPS	Asala Bala	GPS	Asrait Kalam	---do---
73	1038	Arshad Khan	GPS	No.1 Fateh pur	GPS	Yaka	---do---
74	1041	Muhd Zainul Islam	GPS	Binorai	GPS	Chancharay	---do---
75	1043	Ajab Khan	GPS	Langar Khwazakhela	GPS	Zari Nal	---do---
76	1044	Kewal Ram	GPS	Mingota No.3	GPS	Sardary Manglor	---do---
77	1046	Ibrahim Shah	GPS	Sorai Sharifa#1	GPS	Sury Sharaqay No.2.	---do---
78	1047	Roshan ali	GPS	Tang Banr(M)	GPS	Ma Banr Qalagay	---do---
79	1049	Mohammad Azam Khan	GPS	Lakhar	GPS	Ghaund Paty	---do---
80	1050	Fazal Subhan	GPS	Gat	GPS	Shopin	---do---

Umar Khitab  
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81	1052	Mian Gul Sherin	GPS	Rahim Abad No.2	GPS	Abaha No.3.	---do---
82	1053	Javed Iqbal	GPS	Nagoha	GPS	Matiltan	---do---
83	1054	Hazrat hussain	GPS	Madyan	GPS	Par Desha	---do---
84	1055	Jalat Khan	GPS	Karin Gabral	GPS	Jamra	---do---
85	1058	Shakirullah	GPS	M.G Shahed	GPS	Kargaloo	---do---
86	1061	Ahmad Zeb	GPS	Zarakhela	GPS	Sardan	---do---
87	1062	Muhammad Anwar	GPS	Sambat	GPS	Roringar	---do---
88	1072	Sikandar Shah	GPS	Sirsanal #1	GPS	Sharif Abad	---do---
89	1074	Izharullah Khan	GPS	Nawan Kalay 2	GPS	Doghalgy Beha	---do---
90	1075	Sadiq Akbar	GPS	Shin	GPS	Dewan Bala Kot	---do---
91	1076	Iqbal Hussain	GPS	Madyan	GPS	Kunda	---do---
92	1077	Mian Syed Munir	GPS	Bara Sakhra	GPS	Garai Lalkoo	---do---
93	1078	Sultanat Khan	GPS	Shamozai	GPS	Anakar	---do---
94	1079	Ahmad Habib	GPS	Hakim Abad	GPS	Samai	---do---
95	1080	Muhammad Sabir	GPS	Churkhai	GPS	Manz Gat	---do---
96	1083	Muhammad Ayaz	GPS	Koza Bandai #2	GPS	Delay	---do---
97	1085	Amir Zada	GPS	Giri Lagan	GPS	Koza Charay	---do---
98	1089	Gul Zamin Khan	GPS	Mingora No4	GPS	Pishmal No.1.	---do---
99	1090	Saeedullah	GPS	Bahrain	GPS	Zor Kalay	---do---
100	1091	Saeed ahmad	GPS	Bandai	GPS	Sia	---do---
101	1092	Ghulam Sarwar	GMPS	landy Shah	GPS	Manai	---do---
102	1095	Munawar Sher	GPS	Koza Bandai #2	GPS	Dardyal	---do---
103	1096	Sarfraz khan	GPS	Sigram	GPS	Bela Bataka	---do---
104	1097	Mian Rahimi Khan	GPS	Panjigram	GPS	Achar No.1.	---do---
105	1099	Iftikhar Alam Khan	GPS	Bara Bandai #2	GPS	Pianwarai	---do---
106	1101	Manzoor Ali	GPS	Kedam	GPS	Kedam	---do---
107	1103	Amjad Ali	GPS	Barikot	GPS	Pishmal No.2.	---do---
108	1104	Muhammad Zeb	GPS	Bara Durushkhela	GPS	Bala Soor Astaray	---do---
109	1105	Mian Abdul Ahad	GPS	Shin	GPS	Sida Shin	---do---
110	1107	Sheikh Farid	GPS	Shaloon	GPS	Cham Garai	---do---
111	1108	Muhd Nazir	GPS	Ashoka	GPS	Ashoka	---do---

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112	Abdullah Khan	GPS	Gul Derai K/Kh	GPS	Ona Toor Wall	---do---
113	1113 Muhammad Hanif	GPS	Guligram	GPS	Aryana No.2.	---do---
114	1115 Ahmad Taher Shah	GPS	Galooch #1	GPS	Shah Beka	---do---
115	1116 Zalam Bar Khan	GPS	Jare Chinkolai	GPS	Tangai Banda	---do---
116	1117 Abdul Wahid	GPS	Rahim Abad No.2	GPS	Bar Achar	---do---
117	1118 Abdul Ghafoor	GPS	Darolai 2	GPS	Ketal Riamat	---do---
118	1119 Muhammad Nawab	GPS	Landal Shah	GPS	Inzar Kulalay	---do---
119	1120 Niaz ahmad	GPS	Chargo Shah	GPS	Chingai Sar	---do---
120	1125 Sahib Zada	GPS	Kasoona	GPS	Lal Shish	---do---
121	1126 Muhammad Iqbal	GPS	Kohistani Banda	GPS	Chit Karai	---do---
122	1128 Sham Sher Ali	GPS	Gadi	GPS	Bara Gat	---do---
123	1134 Shah wali Khan	GPS	Sambat	GPS	Gam Seer No.2.	---do---
124	1137 Bakht Karam	GPS	Panr	GPS	Mandan	---do---
125	1145 Iftikhar Ahmad	GPS	Dadhara	GPS	Yakh Tangai	---do---
126	1146 Muhd Iqbal	GPS	Kanga	GPS	Bair	---do---
127	1149 Akhtar Biland	GPS	Amankot	GPS	Haji Abad S/Sharif	---do---
128	1152 Ali Akbar	GPS	Koz Shawar	GPS	Pansat	---do---
129	1157 Karimullah	GPS	Gulibagh	GPS	Shinkoo	---do---
130	1159 Muhammad Nasar	GPS	Parrai	GPS	Kass Kalam	---do---
131	1161 Rahmat Ali	GPS	Koza Bandai#2	GPS	Chor Penowarai	---do---
132	1162 Akbar Hussain	GMPS	Matta Bazaar	GPS	Nal Kot	---do---
133	1164 Sulatan Mahmood	GPS	Fazal Abad (D)	GPS	Sekay	---do---
134	1165 Abdur Rahman	GPS	Chatoria	GPS	Shandal	---do---
135	1166 Fazal Subhan	GPS	Dehro Cham	GPS	Sar Khazana	---do---
136	1169 Rahmat Shah Mian	GPS	Tarogey	GPS	Then Toor wall	---do---
137	1171 Aqal Zada	GPS	Chelam Riamat	GPS	Badai	---do---
138	1172 Inamullah	GPS	Mingora No2	GPS	Bar Jabar	---do---
139	1173 Riaz Ahmad	GPS	Amankot	GPS	Kuz Kad	---do---
140	1176 Zafar Javid	GPS	Shaheed Baba Kanju	GPS	Dherai Chinglalai	---do---
141	1179 Luqman Ali	GPS	Gwaleral	GPS	Swati	---do---
142	1180 Nadar Khan	GPS	Baldara No:2	GPS	Onra Dherai	---do---

Umar Khitab  
ADVOCATE



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143	1181	Amir Zeb	GPS	Bahrain	GPS		
144	1185	Fazal Mabood	GPS	Gull Bagh	GPS	Jaga	---do---
145	1186	Roshan ali Khan	GPS	Balalay	GPS	Shalikeyar Madyan	---do---
146	1187	Abdul Latif	GPS	Odigram No.2	GPS	Saldara Matta	---do---
					GPS	Kandowgy Gat	---do---

**TERM AND CONDITION**

- (1) They would be on probation for a period of one year extendable for another year.
- (2) They will be governed by such rules and regulations as may be issued from time to time by the government.
- (3) Their services can be terminated at any time, if their performance is found unsatisfactory during the probation period. In case of misconduct they shall be preceded under the rules framed from time to time by the government.
- (4) Charge report should be submitted to all concerned.
- (5) Their inter-se-seniority on lower post will remain intact.
- (6) No TA/DA is allowed for joining duty.
- (7) In case of any discrepancy or misreporting found in academic / professional documents in respect of the above officials, their promotion shall stand cancelled.
- (8) Their posting will be school based and they shall have to serve at the place of posting and hence not transferable to any other stations.
- (9) Before handing over charge their documents may once again be checked and in case of any discrepancy as per prescribed qualification. They may not be handed over charge.

(SYED MUKHTYAR)  
 SUB DIVISIONAL EDUCATION OFFICER  
 MALE DISTRICT SWAT

**Umar Khitab**  
 ADVOCATE

ndst: No.9330-9480/ PSHTB-15/Promotion/2014

Dated: 13/11/2014

Copy of the above is forwarded for information and further necessary action

1. The Director (E&S) Education K.P.K. Peshawar.
2. The Deputy Commissioner swat.
3. The District Accounts officer swat.
4. The District Education officer Male swat.
5. All the circle ASDEO Male local office.
6. The officials concerned
7. PA to D.E O.Male local office

**Umar Khitab**  
 ADVOCATE

SUB DIVISIONAL EDUCATION OFFICER  
 MALE DISTRICT SWAT



Annex B  
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OFFICE OF THE  
SUB-DIVISIONAL EDU:  
OFFICER (M) CIRCLE MATTA I SWAT

Cell. +92-345-9176170

**Office Order**

The undersigned is pleased to issue the order for adjustment as per directions of Hon. District Education Officer (M) Swat, Mr. Abdussalam PSHT GPS Charai Beha is hereby adjusted in GPS Aghal due to lack of staff because the post B-15 lying vacant because of the retirement of Mr. Sultan Qadim since 01.11.2017, and the school has become single teacher school and therefore students as well as the teacher on duty there are suffering from the situation.

Thus the adjustment is hereby made in the best interest of students there and great public interest till further order.

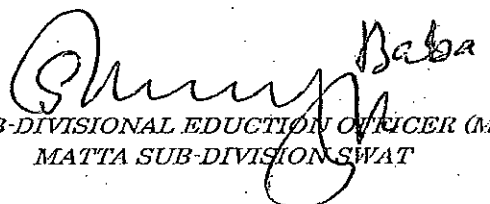
**Syed Mukhtyar Bacha**  
SUB-DIVISIONAL EDUCATION OFFICER (M)  
MATTA SUB-DIVISION SWAT

Endstt. No: 181-182

Dated 30/11 2017

Copies forwarded for information to the:

1. District Education Officer (M) Swat
2. Assistant Sub-Divisional Education Officer (M) Matta I
3. Office Copy

  
SUB-DIVISIONAL EDUCATION OFFICER (M)  
MATTA SUB-DIVISION SWAT

  
**Umar Khitab**  
ADVOCATE

**Umar Khitab**  
ADVOCATE

(M) SWAI AT GULKADA  
Cell # 0946 9240209-228

Annex A Ex C 16

# NOTIFICATION

Consequent upon recommendation of the Departmental Promotion Committee held on 27/02/2019 and Govt; of Khyber Pakhtun Khwa Elementary & Secondary Education Department Notification No SO(B&A)/1-18/E&SE/2012 dated 11/07/2012 and Finance Department Notification No SO9FR)/FD/10-22N(E)/2010 dated 16/07/2012. The following Male PSHT and SPS promoted to the post of CT B-15 (16120-1330-56020) and plus usual allowances as due & admissible under the Rules on the following term & condition wef the date of their taking over charge.

S.No	Name	Present School	School where promoted/posted	Remarks
1	75	Rafiullah	GPS Fazal Baig	GMS Fazal Banda A.V.Post
2	90	Abdul Dayan	GPS Jano	GHS Jano A.V.Post
3	107	Fazal Majid	GPS Sangota	GMS Sangota A.V.Post
4	433	Mukaram Khan	GPS Galooch No:02	GHS Bara Samai A.V.Post
5	504	Mohammad Ibrahim	GPS Geldan	GMS Maloch A.V.Post
6	512	Habib Hassan	GPS Saland	GHS Nazar Abad A.V.Post
7	640	Abdus Salam	GPS Charai Beha	GHS Beha A.V.Post
8	666	Bakht Korim Jan	GPS Asho Barai	GHS Dardiyal A.V.Post
9	751	Amir Zada	GPS Zoor Chail	GHS Bahrain A.V.Post
10	778	Mohammad Zeb	GPS Balasoor Asharoy	GHS Durushkhela A.V.Post
11	800	Ahmad Sarwar	GPS Malook Abad	GHS No 1 Mingora A.V.Post
12	854	Sabir Khan	GPS Deolai No -1	GHSS Deolai A.V.Post
13	880	Liaqat Ali	GPS Fazal Abad (D)	GHS Manai A.V.Post
14	881	Mohammad Iqbal	GPS Deolai No: 1	GHS Shah Dehrai A.V.Post
15	918	Fazal Rabbi	GPS Dambara	GHS Topsisin A.V.Post
16	1072	Shujauallah	GPS Barham Patai	GHSS Mankiyal A.V.Post
17	1182	Rahmat Ali	GPS Malalay	GMS Alamganj A.V.Post
18	1234	Farman Ali	GPS Ghorajoo	GHS Qambar A.V.Post
19	1254	Mohammad Ilyas	GPS K. Khela	GHSS Khvazakhela A.V.Post
20	1282	Rahmat Ali	GPS Manyar	GHS Odigram A.V.Post
21	1298	Mohammad Naeem	GPS Marghuzar	GMS Sapal Bandai A.V.Post
22	1305	Rahammad Khan	GPS Mingora No.3	GHSS No 3 Mingora A.V.Post
23	1311	Rahmatullah	GPS Khaindara	GMS Dero Kabal A.V.Post
24	1355	Nadar Khan	GPS Pashtonai	GHS Gat A.V.Post
25	1359	Mohammad Basher	GMPS Tangai Chinar	GHS Manai A.V.Post
26	1366	Yousaf ali Khan	GPS Galooch#2	GHS Dardiyal A.V.Post
27	1391	Khan Nawab	GPS Sher Palam No 1	GHS Sherpalam A.V.Post
28	1402	Abdul Haq	GPS Manglawer No.1	GHS Manglor A.V.Post
29	1422	Parvez	GPS Kokrai	GMS Sapal Bandai A.V.Post

Umar Kh. Khairab  
ADVOCATE

30	1426	Gohar Ali Khan	GPS Qadi	GHS Sivegolai	A.V.Post
31	1427	Salahuddin	GPS Damana	GHSS Mankiyol	A.V.Post
32	1458	Hazrat Uaman	GPS M.G Shaheed	GMS M.G Shaheed	A.V.Post
33	1467	Amir Timur Shah	GPS Shoukat Darn	GHS Shagai	A.V.Post
34	1481	Mohd Anwar Ali	GPS Mingora No.3	GHSS No 3 Mingora	A.V.Post
35	1496	Salmaan	GPS Fatohma	GHSS Gat	A.V.Post
36	1496	Khalid Iqbal	Grape Tanchkal Kabal	GMS Dagay	A.V.Post
37	1497	Izhar Khan	GPS Tor-Tum	GHS Qambar	A.V.Post
38	1507	Farooq Ahmad	GPS Dilonai	GHS Got	A.V.Post
39	1521	Mohammad Ilyas	GPS Dierol Kabal	GHS Asharay	A.V.Post
40	1555	Mohd Rahimna	GPS Bayoon	GMS Bayun	A.V.Post
41	1602	Sahib Zada	GPS Bulkan, Cham	GMS Palnday	A.V.Post
42	1507	Abdul Wali Khan	GPS Raihanai	GHSS Kokaral	A.V.Post
43	1572	Adalat Shah	GPS Kokral	GMS Marghuzar	A.V.Post
44	1577	Hussam ud Din	GPS Kot Darmni	GHS Roringar	A.V.Post
45	1683	Saif ur Rahman	GPS Manglawer No.1	GMS Siraj Abad	A.V.Post
46	1695	Zafar Ali	GPS Balat	GHS Shawar	A.V.Post
47	1599	Syed Ahmad Khan	GPS Chinar Khwar	GHS Gwalmai	A.V.Post
48	1600	Said Kamal	GPS Islam Pur	GHS Chitor	A.V.Post
49	1603	Sher Ali	GPS Tall	GHS Tall	A.V.Post
50	1604	Bahramand	GPS Bandai Maira	GHS Lakhar	A.V.Post
51	1606	Nisar Ahmad	GPS Ali Grama	GHSS Kabal	A.V.Post
52	1007	Mohd Niqab	GPS Garoon kolarai	GMS Miragal	A.V.Post
53	1012	Mohammad Ayoaz	GPS Kohay	GMS Dedawar	A.V.Post
54	1613	Sher Bahadar Khan	GPS Bandai	GHS NO 1 Mingora	A.V.Post

**CONSEQUENT ADJUSTMENT**

S.No	Name & Designation	Present School	Name of school where is consequent adjusted	Remarks
1	Akhtar Shah CT	GHS Mangitai	GHSS Chantalai	-do-
2	Rahmat Ali CT	GHS Barawal	GMS Dolay	-do-
3	Mohammad Ayoaz CT	GHSS Kishwra	GHSS Batni Kh.Khela	-do-
4	Asadullah CT	GHS Shalpin	GMS Alamganj	-do-
5	Khan Said CT	GHS Topsin	GMS Ganajir	-do-
6	Irshadul Haq CT	GHS Gat	GMS Koz Shawar	-do-
7	Waqas Ahmad CT	GHSS Mankiyol	GHS Asala	-do-

**Terms & Conditions**

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

Umar Khattab  
ADVOCATE

- 6. The would be on probation for a period of one year and liable for discharge.
- 7. The service be terminated at any time in case their performance is found unsatisfactory.
- 8. In case of their conduct, they shall be proceeded under the rules framed by the Government.
- 9. Their inter service seniority in lower post will be retained.
- 10. They will give water salary to be recorded in their service book in the month of...
- 11. them in the light of this order will be recovered in if they are...
- 12. They should join their posts within 15 days the issue of this order...
- 13. Mand cancelled
- 14. Their documents shall have to be checked by the concerned authorities...
- 15. relevant qualifications as per rules they may not be handed over...
- 16. Their necessary documents will be verified from the concerned authorities.

INDIA WAKALI  
DISTRICT TRIBUNAL  
SVAMINATHAN  
Dindur

Endst No: 13258-61 /CT/Promotion  
Copy of the above is forwarded for information to the following:

1. The Director, Planning & Security, Bangalore
2. The District Commissioner of Accounts, Srirangapatna
3. The Principal, Government College, Srirangapatna
4. The candidate concerned
5. PA to D.C. Srirangapatna

*Umar Khitab*  
ADVOCATE

Umar Khitab  
ADVOCATE

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National Bank of Pakistan

Account Statement

**Amex = D**

Account Title(s) H T GPS CHARAI

Address: VIII CHARRAI PO MATTA DISTT SW  
AT

Town:

District:

City: PESHAWAR

Province/State: KH. PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 6871211

Account No: 4085633325

IBAN: PK26NBPA0663004085633325

Postal Code:

Branch Code/Name: 663 Matta Branch

Region Name: Mardan

Statement of Account

Statement Printing Date: 25-Apr-2018

*Handwritten signature*

B/F Balance: 0.00

From: 01-Jan-2014

To: 31-Dec-2017

S. No.	Date	Particulars	Instno	Memo	Debit	Credit
1	10-Jul-2014	TRANSFER	6000028	10	0.00	21,000.00
2	10-Feb-2015	TRANSFER	30029	10	0.00	21,000.00
3	09-Apr-2015	CASH	354070	09	42,000.00	0.00
4	27-May-2015	TRANSFER	40007	27	0.00	562,000.00
5	27-Jul-2015	CASH	304202	27	562,000.00	0.00
6	18-Mar-2016	TRANSFER			0.00	10,000.00
7	31-Mar-2016	TRANSFER			0.00	10,000.00
8	30-Jun-2016	TRANSFER			0.00	335,000.00
9	29-Sep-2016	TRANSFER	DV		335,000.00	0.00
10	09-Jan-2017	DEPOSIT			0.00	670,000.00
11	09-Jan-2017	DEPOSIT			0.00	150,000.00
12	10-May-2017	CASH WITHDRAWAL	304201		13,000.00	0.00
13	17-Oct-2017	CASH WITHDRAWAL	304203		200,000.00	0.00
14	23-Oct-2017	CASH WITHDRAWAL	304204		200,000.00	0.00
15	26-Oct-2017	CASH WITHDRAWAL	304206		200,000.00	0.00
16	15-Nov-2017	CASH WITHDRAWAL	304207		100,000.00	0.00
17	28-Nov-2017	CASH WITHDRAWAL	304209		132,000.00	0.00

Total 3 Credit transactions of amount: 1,789,000.00

Total 9 Debit transactions of amount: 1,789,000.00

*Umar Khitab*  
**Umar Khitab**  
ADVOCATE

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National Bank of Pakistan

Account Statement

⑩

⑦⑤

Account Title(s) H. T. P. S CHARAI

Address: VILL CHARRAI PO MATTA DISTT SW  
AT:

Town:

District:

City: PESHAWAR

Province/State: KH. PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 6871211

Account No: 4085633325

IBAN: PK26NBPA05633004085633325

Postal Code:

Branch Code/Name: 663 Malta Branch

Region Name: Mardan

Statement of Account

Statement Printing Date: 25-Apr-2018

*[Handwritten Signature]*

B/F Balance: 200.00

From: 01-Jan-2018

To: 25-Apr-2018

S. No	Date	Particulars	Instno	Memo	Debit	Credit	Balance
1	30-Jan-2018	DEPOSIT			0.00	10,000.00	10,200
2	12-Feb-2018	DEPOSIT			0.00	12,000.00	22,200
3	19-Apr-2018	DEPOSIT			0.00	50,600.00	72,200
4	19-Apr-2018	DEPOSIT			0.00	530,000.00	602,200

Total 4 Credit transactions of amount: 602,000.00

Total 0 Debit transactions of amount: 0.00

*[Handwritten Signature]*

**Umar Khitab**  
ADVOCATE

National Bank of Pakistan

Account Statement

21

(Handwritten initials)

Account Title(s): PTC GPS CHATIKAL SWAT

Address: VILL CHUPRIAL TEH MATTA DISTT  
SWAT

Postal Code:

(Handwritten postal code)

Branch Code/Name: 663 Matta Branch

Region Name: Mardan

Statement Printing Date: 19-Jun-2019

User: 00013880

Branch: 663

Terminal: MANAGER-PC

Town:

District:

City: PESHAWAR

Province/State: KH PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 6871212

Account No: 4085633343

IBAN: PK25NBPA0663004085633343

B/F Balance: 3,100.00

From: 01-Jan-2016

To: 31-Dec-2016

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
1	18-Mar-2016	TRANSFER			0.00	12,000.00	15,100.00
2	18-Mar-2016	TRANSFER			0.00	10,000.00	25,100.00
3	03-Aug-2016	CASH WITHDRAWAL	445724		25,000.00	0.00	10,100.00
4	29-Sep-2016	TRANSFER			0.00	335,000.00	335,100.00
5	03-Nov-2016	CASH WITHDRAWAL	445725		335,000.00	0.00	10,100.00

Total 3 Credit transactions of amount: 357,000.00

Total 2 Debit transactions of amount: 360,000.00

**Umar Khitab**  
ADVOCATE

The amount of Rs=335,000/- transferred to A/c NO: 4085633343 with Title of the account GPS Chatikal Swat with the request of Head Master endorsed by DEC 22/9/2016 on 29/9/2016 as shown in this statement

(Handwritten signature)



## National Bank of Pakistan

## Account Statement

22

Account Title(s) H.T GPS CHARAI

Address: VILL CHARRAI PO MATTA DISTT SW  
AT

Town:

District:

City: PESHAWAR

Province/State: KH.PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 6871211

Account No: 4085633325

IBAN: PK26NBPA0663004085633325

Postal Code:

Branch Code/Name: 663 Matla Branch

Region Name: Mardan

Statement of Account

Statement Printing Date: 11-Aug-2017

B/F Balance: 200.00

From: 01-Jan-2016

To: 11-Aug-2017

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
					0.00	10,000.00	10,200.00
1	18-Mar-2016	TRANSFER			0.00	10,000.00	20,200.00
2	31-Mar-2016	TRANSFER			0.00	335,000.00	355,200.00
3	30-Jun-2016	TRANSFER			0.00	335,000.00	355,200.00
4	29-Sep-2016	TRANSFER		DV	335,000.00	0.00	20,200.00
5	09-Jan-2017	DEPOSIT			0.00	670,000.00	690,200.00
6	09-Jan-2017	DEPOSIT			0.00	160,000.00	850,200.00
7	10-May-2017	CASH WITHDRAWAL	304201		18,000.00	0.00	832,200.00

Total 5 Credit transactions of amount: 1,185,000.00

Total 2 Debit transactions of amount: 353,000.00



Umar Khitab  
ADVOCATE

Amra.

23 5

(17)

(6)

بخدمت جناب ڈی ای او صاحب (مردانہ ایجنسی اینڈ سینٹر)

بواسطہ ایس ڈی ای او صاحب مٹ سب ڈویژن

عنوان: پی ٹی سی ریکارڈ میں بے ضابطگی PS کے چوٹی پر  
ت مل مسئلہ جناب عالی:-

گزارش یہ ہے کہ میں نے 13 مارچ 2018 کو گورنمنٹ پرائمری سکول چوٹی میں PSHT کے پوسٹ پر چارج لیا ہے۔ مگر سکول بندا میں تعمیراتی کام کس قسم کا ریکارڈ موجود نہیں ہے اور نہ تعمیراتی کام باہر تکمیل تک پہنچ چکے ہیں حالانکہ 2014 سے نومبر 2017 تک سترہ لاکھ سترہ سو بیس ہزار روپے 27000 روپے دیواری نامٹ سے نکالے گئے ہیں۔ بینک کا ثبوت لف ہے۔ سکول کے چار علاوہ چار دیواری میں ناقص اینٹ کا استعمال کیا گیا ہے۔ اس سلسلے میں اجلاس کاروائی رجسٹر وغیرہ بالکل خالی ہیں۔ اور سابقہ پیسٹ ڈیپارٹمنٹ کے تبدیلی نومبر 2017 کو عمل میں لائی گئی تھی۔

لیڈنگ پ صاحبان کی خدمت میں عرض ہے کہ سابقہ کام اور رقم کی کوئی ذمہ داری مجھ پر ماند نہیں بیوگی۔ اور میرے دوران سروس سکول بندا میں کیے گئے کام کا میں ذمہ دار بیو گا۔

D.A / P.D  
put up for inquiry  
ایف اے علی خان  
پیسٹ ڈیپارٹمنٹ چوٹی  
توڈی 21735

العارض 19/4

Chairman P.T.C  
GPS, Charai Biha  
Distt: Swat.

Umar Khitab  
ADVOCATE

Govt. Primary School  
Charai Biha Swat  
date = 29/03/019

35/49/4/4

5

Received on 14-6-2019

Handwritten initials and a circled number '10'.

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) SWAT

Handwritten signature and initials.

**OFFICE ORDER**

Mr. Hamid-ul-Haq Principal GHS: Kanju District Swat is hereby nominated as inquiry officers to enquire the application received from Head Teacher GPS: Charai Biha District Swat against Ex-Head Teacher in the same school (photo copy attached) and submit facts detail report to this office within a week for further necessary action.

(Muhammad Amin)  
DISTRICT EDUCATION OFFICER (M)

Endst:No: 2557 /G.File/PTC Dated 27/6/2019 /2019.

- Copy forwarded to the:
- 1- Mr. Hamid-ul-Haq Principal GHS: Kanju District Swat.
  - 2- P.A to District Education Officer (M) Swat the local office.

Handwritten signature of Muhammad Amin  
DISTRICT EDUCATION OFFICER (M)  
SWAT


Handwritten signature  
**Umar Khitab**  
ADVOCATE

۹- ۲۵

مقررین کو ایجا ہے۔ کہ میں نے بیڈنگ کے لئے  
GPS چٹری سے بینٹ اور روغن و مینڈر کے مبلغ  
5000/- روپیہ وصول کیے۔

عبدالامین خان

  
**Umar Khitab**  
ADVOCATE

  
**HEAD MASTER,**  
Govt. Primary School,  
Charai, Biha, Distt: Swat.  
Code No: 24725

26

لقد لقيت ايمانا بي ان في حين اني اعمل في HPST  
5000/- في وقتي اتي من قريتي من اجل ان ابيع -  
وربما و هو ان ابيع

بشهر اكتوبر

مكتبه حرمين  
Charai Bilh

جمشيد علي ولد ابي ابراهيم

25.5.2015  
HEAD MASTER,  
Govt: Primary School,  
Charai, Bilh, Distt: Swat,  
Code No: 21736

ع

  
Umar Khitab  
ADVOCATE

27

لکھنؤ ایماں یہ کہ میں نے سسی عبدالسلام H.P.S سے  
H.P.S ڈیڑھی بیٹا کیلئے فرسٹ بنانے اور فرسٹ کرنے  
کے -/5350 روپیہ وصول کیے۔

جمشید خان

دستخط محمد حسین

جمشید ولد اول خان  
ڈیڑھی بیٹا -

*[Handwritten Signature]*

HEAD MASTER,  
Govt. Primary School,  
Charal, Biha, Distt: Swat.  
Code No: 21735

محمد حسین خان  
Chairman T.C.T  
G.P.O, Charal, Swat  
Distt: Swat

*[Handwritten Signature]*

Umar Khitab  
ADVOCATE

گزارش کی جاتی ہے۔ کہ میں نے پورے سال کے دوران جو رقم  
چھٹی ہوا ہے اسکو لیکچر میں لکھنے کے عنوان میں  
7000 روپے وصول کیے۔

محمد امجد  
Charai, Biha, Distt: Swat  
Code No: 21735

محمد

محمد امجد  
محمد امجد

HEAD MASTER,  
Govt: Primary School,  
Charai, Biha, Distt: Swat.  
Code No: 21735

Umar Khitab  
ADVOCATE

29

لکھنؤ کیجائے ہے کہ جس عبدالستیم HPST ، GPS  
جوڑی بیہا نے سکول کیلئے بیہا کا دکان سے مبلغ  
5000/- روپے کے رنگ و روغن خریدا ہے اس  
سے ان سے 5000/- روپے وصول کیے۔



HEAD MASTER,  
Govt. Primary School,  
Charai, Biha, Distt: Swat.  
Code No: 21735

دستخط و سربراہ  
P.T.C

مدرسین کان  
Chairman P.T.C  
GPS, Charai Biha  
Distt: Swat.



  
Umar Khitab  
ADVOCATE





3  
صدر ایف ایف ای بی۔ کہ میں نے غسی عبد اللہ مع HPST  
سے رٹنگ لگانے کی فرودوں کے طور پر مبلغ  
2000/- روپے وصول کیے۔

وخطور میں

جمہوریت

Approval 25-5-2015

HEAD MASTER,  
Govt. Primary School,  
Charai, Biha, Distt: Swat.  
Code No: 21735

محمد رفیع خان  
Chairman P.T.C  
GPS, Charai Biha  
Distt: Swat

جمہوریت علی و لکھ افان

CTC

Umar Khitab  
ADVOCATE



ابو احسان ہارڈ ویئر پینٹ اینڈ سنٹری سٹور  
 ہول سیل ڈیلر 32  
 0334-9342012 - 0946-791060

تمام مال برقی کھول، نقد، روٹک اور سبزی بازار سے امداد و مستجاب ہیں / قابل امداد و مستجابات

نمبر موہن 03342292870 تاریخ

تعداد	تفصیل	رخ	روپے
		2	500
		2	200
		1	100
		1	50
		2	120
		2	100
		1	20
		6	60

Umar Khitab  
 ADVOCATE

1150

دستخط محمد حسین  
 P.T.C

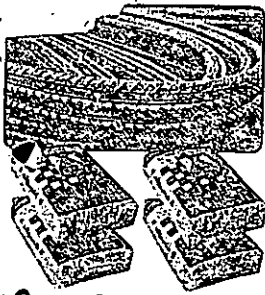
Chairman P.T.C  
 P.S. Charal Bihe  
 Distt: Swat.

دستخط محمد حسین  
 Govt. Primary School  
 Charal, Bihe, Distt: Swat.

HEAD MASTER,  
 Govt. Primary School,  
 Charal, Bihe, Distt: Swat.  
 Code No: 21735  
 0334-9622299

نوش  
 دستخط

شیر پرنٹنگ سروسز سوات



# ملک سٹیٹل ایڈیٹڈ سینٹ ایگنسی

کالج چوک مٹہ سوات

فون: 0946-790949 موبائل: 0300-5748482

33

تاریخ 2015: 8: 12

نمبر 2037

سرکار پاکستان پی ایچ ڈی

بنام

شمار	تعداد	تفصیل	نرخ	روپے
1.	200	پورے لیسے	500	100000
2.	1/2	750 + 1 kg	3450	51750
3.	1/2	50 - kg	3750	3750
4.	1/4	50 - kg	130	650
5.	1/4	50 - kg	760	760
6.				
7.				153900
8.				
9.		Umar Khitab ADVOCATE		P.T.C حیدر مین
10.				
11.		سرکار پاکستان پی ایچ ڈی		مذبحہ
12.				Chairman P.T.C GPS, Charai Billa Dist: Swat.
13.				
14.				

HEAD MASTER,  
Govt. Primary School,  
Charai, Billa, Dist: Swat.  
Code No: 21735

دستخط

بشیر احمد پرنٹنگ سرورس موبائل: 0344-9622299

34

تصدیق ایجابی ہے۔ اس میں عبدالصمد HPST، GPS، حویلی  
بیہانے پیمارہ دکان سے سکول لے لیں 10 بورڈ سینٹ  
فریڈ لیا ہے۔ جسکی قیمت مبلغ -/65000 (دو سو چھ لاکھ  
سنتا ہے۔ ہم نے وصول کیے۔

*Ashraf*

HEAD MASTER,  
Govt: Primary School,  
Charal, Biha, Distt: Swat.  
Code No: 21735

دستخط چیرمین P.T.C

محمد امین مکی  
Chairman P.T.C  
GPS, Charal Biha  
Distt: Swat.

*Umar*

Umar Khitab  
ADVOCATE



ابو احسان ہارڈ ویئر پینٹ اینڈ اسٹیشنری سٹور  
ہول سیل ڈیلر

0334-9342012 - 0946-791060

ہمارے ہاں ہر قسم کیل، قبضہ، رنگ اور اسٹیشنری ازارے برامیت دستیاب ہیں۔ / بلحاظ بلڈنگ ڈاکٹرانہ محمد خان بازار مہسوات

نمبر 35  
تاریخ  
نام

تعداد	تفصیل	نرخ	روپے
3	3 سب پینٹ	1000	3000
	سٹیشنری		200
	سٹیشنری		210
			3410

لوگو

CF

Umar Khitab  
ADVOCATE

دستیاب و پیکر میں PTC

Chairman P.T.C  
266, Charai Bihra  
Distt: Swat.

دستیاب و پیکر میں PTC

HEAD MASTER,  
Govt. Primary School,  
Charai, Bihra, Distt: Swat.  
Code No: 21735

نوٹس

دستخط

بیشتر رنگ ہر روز سو: 0344-9622299

36

Eagle

Whole Sale Dealer

MOBILE ZONE

ایگل سوبانڈون



Invoice No

1641

Date

19.8.15

Name

Rs 8000 نیما بیگز سائٹ GPS جڑی

Model

X2  
L 80

IME No

Warranty

Signature

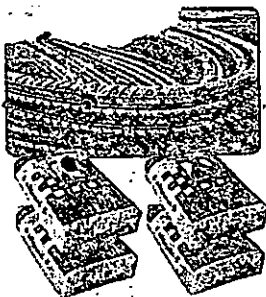
Umar Khitab  
ADVOCATE

☛ موبائل فون خریدتے وقت پوری تلی کر لیں۔

☛ موبائل فون کھولنے کے بعد واپسی پر 30 فیصد کٹوتی ہوگی۔

☛ وارنٹی والا سیٹ کی ذمہ داری صرف کپنی پر ہوگی۔

☛ سیکنڈ ہینڈ موبائل فون کی کوئی وارنٹی / گارنٹی نہیں ہوگی۔ وقت پر چیک کرنا ہوگا بعد میں کوئی شکایت قابل قبول نہیں ہوگی۔



# ملک سٹیٹل ایڈیٹریٹ پیمنٹ ایجنسی

کالج چوک مرہ سوات

فون: 0946-790949 موبائل: 0300-5748482

تاریخ: 2015-09-10

نمبر: 37  
 بنام: بیگز سائبر گپ جرائی

شمار	تعداد	تفصیل	نرخ	دوبہ
1	200	پورے پورے	500	100000
2	1/2	9 فن سہریا	3400	30600
3				
4				690
5				
6				131290
7				
8				P.T.C
9				
10				
11				Chairman P.T.C
12				P.S. Charal B. Dist: Swat.
13				
14				

Umar Khitab  
 ADVOCATE

HEAD MASTER,  
 Govt: Primary School,  
 Charal, B. Dist: Swat,  
 Code No: 21735

بشیر احمد پرنٹنگ پرس موبائل: 0344-9622299

دستخط



لکھنؤ ایجنسی کے مکرم مسی عبدالرحم، PSHT، GPS، چرائی  
 بیہا نے سکول میں فرسٹ نمبر آئی ڈرائیو بھری خرید  
 کی ہے۔ جسکی قیمت بچہ کرایہ - 6000/- روپیہ بنتا ہے  
 ہم نے وصول کیے۔

دستخط و تہ میں P.T.C  
 15-5-15

HEAD MASTER,  
 Govt. Primary School,  
 Charai, Biha, Distt: Swat.  
 Code No: 21735

محمد امین خان  
 Chairman P.T.C  
 GPS, Charai Biha  
 Distt: Swat.

حومن خان ڈرائیو  
 ڈرائیو

ت

Umar Khitab  
 ADVOCATE

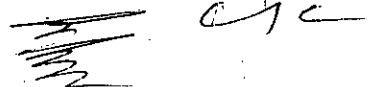
تقریباً کچھ ایسے کہ میں جو کچھ GPS پر چڑھی ہوئی  
اول خان کے پتے کے ساتھ GPS پر چڑھی ہوئی ہے اس کے  
کے ساتھ ہی اس کے پتے اور لائن کے ساتھ ہی 15000  
روپے وصول کیے۔

محمد امین خان  
Government P.T.O.  
Charai Biha  
Distt: Swat

دستخط جو کچھ دار  
اول خان



HEAD MASTER,  
Govt. Primary School,  
Charai, Biha, Distt: Swat.  
Code No: 21735



Umar Khitab  
ADVOCATE

عین عارف خان ایف ایل عویائل روون عہدہ تصدیق  
کرتائیوں کہ میں نے اپنی فطری میا کے پیڑھا کر  
سے QX2 عویائل سیٹ کے مبلغ - 8000/- روپے  
وصول کیے۔


⊕  
دستخط دکاندار

دستخط حیدر حسین

محمد امین خان

دستخط پیڑھا کرتا ہے

  
**Umar Khitab**  
ADVOCATE

  
**HEAD MASTER,**  
Govt: Primary School,  
Charai, Biha, Distt: Swat.  
Code No: 21735

۶۱ اسید

عین علی بیاد درخان ملک سینٹو سینٹ اڈکسی

تقدیق کرتا ہوں کہ میں نے پیڑھا کے GPS پڑھی ہیں

سے تاریخ 12 <sup>8</sup>/<sub>15</sub> سینٹو سرحد و غیرہ کے عین - 1539001  
روے و پول ہے۔

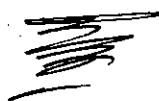
دکھو دکھو


Ali

دکھو حیرتیں PTC

دکھو پیڑھا کے PTC

چکمان پ.ت.و  
Chakman P.T.O  
GPS, Charai Biha  
Distt: Swat.

  
Umar Khitab  
ADVOCATE

  
HEAD MASTER,  
Govt: Primary School,  
Charai, Biha, Distt: Swat.  
Code No: 21735

42  
دستخط

میں مسمی علی رحمان ولد شہزاد علی خان ساکن بہا  
ڈانٹا والا ڈانٹا PF-3459 اقدیقہ اتر ساہیوال کم  
میں اپنے بیڑے کا GPS چڑھی جاتا ہے بحری کرسٹن وغیرہ  
کا ٹیکہ لیکر - 1860001 روپے وصول کیے۔

علی رحمان  
دستخط علی رحمان ڈانٹا

دستخط چیرمین PTC

محمد رفیق صاحب  
Chairman P.T.C  
GPS, Charai Biha  
Distt: Swat.

دستخط ہیڈ ماسٹر GPS چڑھی

HEAD MASTER,  
Govt: Primary School,  
Charai. Biha, Distt: Swat.  
Code No: 21735

Umar Khitab  
ADVOCATE

میں علی بیادرفان ملک سٹیٹ بینک کی ایکٹیوٹی میں  
تشریح کرتا ہوں کہ میں نے یہ رقم اس کے GPS کارڈ میں  
میں بتا رہے ہیں 9/2015 سٹیٹ بینک کی طرف سے  
13,290/- روپے وصول کیے۔

دستخط کا انداز  
Ali

دستخط بیڈنگ

دستخط و جہد میں DTC

محمد امین خان

Chairman P.T.C  
GPS, Charai Biha  
Distt: Swat.



Umar Khitab  
ADVOCATE



HEAD MASTER,  
Govt: Primary School,  
Charai. Biha, Distt: Swat.  
Code No: 21735

عین فضل الرحمان ولد حفصاح الدین لقیڑی کو گواہوں

کہ عین نے پبلڈ سائیکل GPS چوری کیا جسے آگسٹ 2015


میں ویزدور کا نمبر لکھ کر صلح - 9000007 روپے وصول  
کیے۔

دستخط نیگہ دار فضل رحمان  
عین فضل الرحمان ولد حفصاح الدین

دستخط حیرتین PTC

حیہ اصرافان  
Chairman P.T.C  
GPS, Charai Biha  
Distt: Swat.

دستخط پبلڈ سائیکل

  
HEAD MASTER,  
Govt: Primary School,  
Charai. Biha, Distt: Swat.  
Code No: 21735

  
Umar Khitab  
ADVOCATE

آج بحور نم 4 امارچ 2015ء بروز پندرہ گورنمنٹ پرائمری سکول ڈی پی ٹی سی کا اجلاس منعقد ہوا جسکی صدارت چیرمین محمد امین خان نے کیا جس میں سکول عمل اور ڈی پی ٹی سی ممبران نے شرکت کیا

اس اجلاس میں فیصلہ کیا گیا کہ مبلغ چار ہزار روپیہ جو سیکرٹری کلب کے محققین ہے۔ اس پر سیکرٹری فریدی جائے۔ مہرمت کلب کے جو رقم محققین ہے۔ اس پر مہرمت کلب کے مواد خرید کرئی جائے۔ اور باقی رقم فریشن کی جائے۔ قومی چھنڈے کلب کے بنائی جائے اور باقی رقم پر لپشٹہ لکھ کر لی جائے۔

اسد علاوہ اجلاس میں طلبہ کے امتحانات اور کتب کی وصولی اور تقسیم کے بارے میں بھی غور و خوض کیا گیا۔ اجلاس کا اختتام دعا سے ہوا۔

دستخط چیرمین محمد امین خان  
Chairman P.T.C  
GPS, Charal Biha  
Distt: Swat

دستخط سکریٹری  
HEAD MASTER,  
Govt. Primary School,  
Charal. Biha, Distt: Swat.  
Code No: 21735

ممبر 1  
جمشید Jamsh Ad Ali

دستخط ناشر شخصیت  
محنت زین خان

ممبر 2  
اویلیا خان

ممبر 3  
Umar ab  
ADVOCATE

ممبر 4  
اجمل خان

ممبر 5  
رضا خان  
Raza



رپورٹ برائے ترقیاتی کام GPS پر مبنی مہینہ سہ ماہی 2015

اگست 2015 تک PTC اکاؤنٹ سے بنام سربراہان سے پانچ لاکھ باسٹھ ہزار روپے PTC رقم میں اور مگر ان کے حالات و مشورہ اور حالات اور ضرورت کیطابق علی رقم کو استعمال کرتے ہوئے سکول بڑا چونکہ بارانی اور بیماری علاقہ ہے، کیلے اسپینڈ سرے، بھری اور سٹرو استعمال کرتے ہوئے عندرہم ذیل کام کیلے

1 سکول میں جانے کیلے ایک بل تعمیر کیا جسکی لمبائی 22 فٹ اور چوڑائی 20 فٹ ہے  
2 بل سے متصل پارکنگ کیلے حکم بنانے جسکی لمبائی 18 فٹ اور چوڑائی 33 فٹ ہے

3 سکول کو پیرسائی نالہ اور سیرابی پانی سے محفوظ بنانے کیلے اور مستقبل میں

چار دیواروں بنانے کیلے سکول کے مشرقی جانب بل سے متصل جنوب کی طرف

لشیز تعمیر کیلے جسکا ایک حصہ 27 فٹ لمبا، 3 فٹ چوڑا اور 7 فٹ

اوچکائی ہے۔ جبکہ دوسرا حصہ 23 فٹ لمبا، 3 فٹ چوڑا اور 11 فٹ اوچکائی

ہے۔ جبکہ تیسرا حصہ 50 فٹ لمبا، 3 فٹ چوڑا اور 11 فٹ اوچکائی ہے۔

4 سکول بڑا کے ایک سائڈ جنوب میں 99 فٹ لمبا  $1\frac{1}{2}$  فٹ اوسط چوڑا

جسکی 64 فٹ لمبائی کی اوچکائی 5 فٹ ہے، 12 فٹ کی اوچکائی 7 فٹ ہے

اور 23 فٹ لمبائی کی اوچکائی 11 فٹ ہے۔ اللہ تعالیٰ کی فضل و کرم

سے تعمیر کی گئی ہیں۔ رپورٹ پیش خدمت ہے۔

—

Umar Khitab  
ADVOCATE

آج مورچہ 19<sup>8</sup>/<sub>2015</sub> بروز پیر گورنٹ پرائمری اسکول  
چراہ کی بی بی سی اجلاس منعقد کیا گیا۔ جس میں  
صدرین محمد امین خان نے فرمائی۔ جس میں سٹول محلہ،  
بی بی سی عبدالرزاق اور دیگر شرکات کی۔

اجلاس میں مفصل کیا گیا۔ کہ بی بی سی اکاؤنٹ  
میں اسیال جو رقم ملے۔ سب سے پہلے راستہ عام سے نالے پر  
سٹول کنڈیشن لگوا جائے۔ اور باقی رقم نالے کی طرف  
لیٹلوں پر فروج کی جائے۔ مسئلہ کا اختتام دعا سے ہو گیا۔

دستخط صدرین بی بی سی  
حی بی ایس چراہ  
محمد امین خان  
GPS, Charai Bina  
Dist: Swat.

دستخط سیکریٹری  
حی بی ایس چراہ  
HEAD MASTER,  
Govt. Primary School,  
Charai, Bina, Dist: Swat.  
Code No: 21735

دستخط محمد عمر

دستخط بااثر

محمد علی شہر خان

محمد زین خان

محمد عمر

محمد عمر

اولیاء خان

بااثر خان

محمد عمر

محمد عمر

اجمل خان

رضاحان

برائے کنیڈیشنل گرانٹ اسٹیٹ

آج بحرحم 11 اگست 2015 بروز منگل GPS میٹری

میں دی بی سی کا اجلاس کا صیغہ کیا گیا۔ جسکی صدارت

محمد عین محمد امین خان نے فرمائی جس میں محمد سکول اور عمران

دی بی سی نے شرکت فرمائی۔ اجلاس کا باقاعدہ آغاز تلاوت کلام پاک

سے ہوا۔ اجلاس میں فیصلہ کیا گیا کہ PTC اکاؤنٹ سے

جو رقم ملی ہے، اسکو اسٹیٹ کیا جائے۔ اور سکول پرانے

مشرقی جانب جو مہاڈی اور برساتی نالہ ہے۔ وہاں پر لشرہ

ملی اور اگر موسیٰ دیوار لشرہ کیا جاسکے۔ اور جنوبی طرف

کو لشرہ یا دیوار لشرہ کیا جائے تاکہ برساتی پانی اور ٹوفان

سے سکول کو محفوظ کیا جاسکے۔ اس بارے میں ضروری

صلاح و مشورہ اور عام لوگوں سے بھی رائے لی تاکہ

کام شروع کیا جاسکے۔

دستخط صدر میں

محمد عین محمد امین خان  
Chairman GPS, Charai Baha Distt: Swat.

دستخط سیکرٹری

GPS میٹری  
HEAD MASTER,  
Govt. Primary School,  
Charai, Baha, Distt: Swat.  
Code No: 21735

ممبر ۱

محمد عین محمد امین خان

ممبر ۲

اولیاد خان

ممبر ۳

اجمل خان

دستخط بااثر شخصیت

محمد زمین خان

ممبر ۴

باجاوس خان

ممبر ۵

رضاقان

تعمیراتی رپورٹ برائے سال 2014-15 GPS چڑھی گیا

مدرسہ

رپورٹ بابت تعمیر فرمائش، قیمت، جو نازنگ و روغن دروازہ جات

مدرست

اور دیواریں، چھت کا دوپہا رنگ و سینٹ

لم

PTC سینٹ اکاؤنٹ سے بنام بیڈنگر صاحبہ دو سائوں کے جو بنائیں پرا

کاؤنٹ

میں تصفی رقم بڑا پر سکول بڑا کبلا د ضرورت کیلئے

الے پر

① کمروں کے باہر تک فرش تعمیر کیا گیا۔ ② فرش سے متصل دیوار و طوطی لکیر

رف

رنگ لکیر بنایا۔ ③ کمروں کے سامنے نیچے سیدھیوں تک فرش کرنے جو نازنگ کیا۔

یوٹی

④ کمروں کے دروازوں کو رنگ و روغن لگایا۔ ⑤ دیواروں کو چونا اور

سینٹ لگایا گیا۔ ⑥ چھت کو اوپر سے دو نازنگ اور سینٹ لگایا گیا

⑦ اس رقم میں سے مبلغ (12000 + 3000) سکول جو ایدار کو بذوق اور

یوٹی

کراہے کبلا ادا کبلا کیے۔ تفصیل درج ذیل ہے۔

دستی خط چیرمین P.T.C  
محمد امین خان  
Chairman P.T.C  
GPS, Charai Bih  
Distt: Swat.

فرش کا ٹیکہ = 5000/-

قیمت کا ٹیکہ = 7000/-

رنگ و سینٹ = 4690/-

رنگ بزدوری = 2000/-

دستی خط چیرمین P.T.C  
GPS چڑھی گیا  
Chairman P.T.C  
GPS, Charai Bih  
Distt: Swat.

بذوق رقم کراہے = 15000/-

سویاٹیل میٹریل پورٹ = 8310/-

ٹوٹل فرما شدہ رقم = 42000

شیر

دستی خط چیرمین P.T.C محمد امین خان

دستی خط چیرمین P.T.C اویس خان

دستی خط چیرمین P.T.C رضا خان

دستی خط چیرمین P.T.C باجاوس خان

۷۷

التقريب

شرح فی تفصیل

روزی	562000	PTC اکاؤنٹ سے علی رقم نقد التقرب
	153900	سینٹ و سرپیک کا رقم برسرہ
	131290	برسرہ
	186000	بحری و دریش کا ٹیکہ
	90000	میسین و منڈور لہر کا ٹیکہ
روزی	561190	لوٹل رقم

سٹیٹ بیلنس

الق علی

سینٹ

الانڈیا

فڈ

میں

ف

ف

ف

ف

ف

ف

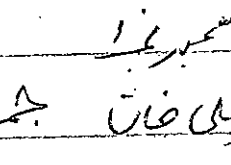
ف

دستخط و سرپیک P.T.C GPS چرائی  
 محمد اہیہ خان  
 Chairman P.T.C  
 GPS, Charai Biha  
 Dist: Swat.

دستخط سیکریٹری  
 Chairman P.T.C  
 GPS, Charai Biha  
 Dist: Swat.



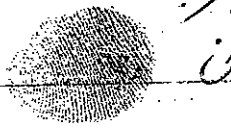
دستخط محمد عزیز  
 محنت زمین خان



دستخط محمد عزیز  
 جمشید علی خان



دستخط محمد عزیز  
 باجا و س خان



دستخط محمد عزیز  
 اولیا خان



دستخط محمد عزیز  
 رضا خان



دستخط محمد عزیز  
 رحیل خان

ت

Umar Khitab  
 ADVOCATE

2- رضاحاں ولد عبدالرحمان سکنہ جڑی 6 درجہ 1/20-43-15601

مہر بی بی سے کونسل GPS جڑی

3- احسان اللہ ولد عمر بازار سکنہ جڑی کاروبار 3-79-46435-15601

مہر بی بی سے کونسل GPS جڑی

4- ولیا خان ولد شاہ زمان خان سکنہ جڑی کاروبار 5-63-41299-15601

درجہ بالا مسٹان اقرار کر کے مکلفیتے ہیں۔ کہ سابقہ

ہیڈ ٹیچر عبدالسلام نے سکول میں تعزاتی کام کے آغاز سے تمام مہران کا اجلاس طلب کیا اور سکول کے عین سامنے نئی مہر بی بی تعمیر کرنے کی باقاعدہ منظوری لی گئی جو کہ طلباء کی مشکلات کو مد نظر رکھتے ہوئے تمام مہران متفقہ طور پر منظوری دی۔

اس کے علاوہ چار دیواری جو کہ نامٹل ہے اس کے بارے

میں کوئی مشورہ نہیں کیا گیا ہے اور بینک سے منگوائے گئے

رقم کے بارے میں ہمیں مہران مذکورہ کو کوئی معلومات

نہیں۔

2- رضا خان ولد عبدالرحمان  
15601-4597726-3

1- اعلیٰ خان ولد بہار خان  
15601-8454931-5

Attested  
Start  
Govt. Primary School  
Charal, District, Faisalabad

Attest  
Ullah

5- ولیا خان ولد شاہ زمان خان  
15601-4129963-5

4- احسان اللہ ولد عمر بازار  
15601-4643579-3

Ullah Khitab  
ADVOCATE

Annex: 1

میں عنایت الرحمن ولد رحمان گل گاؤں پستون ڈاکھانہ لاہور تحصیل منڈی

منڈی سوات بہ اقرار کرنا کہ دیتا ہوں کہ میرا تقرری جمالی ایس پی سی

کوڈ نمبر 21735 میں بحیثیت ایس ایس ٹی 26 مارچ 2016 کو ہوا ہے۔ اس

وقت عبدالسلام سکول کا انچارج تھا اور لایق زادہ سکول پڑا میں مدرسہ تھا

26 مارچ 2016 کے بعد سکول میں باونداری وال کا کام ہوا تھا جس کے

ذمہ داری میں عبدالسلام PSHT کے مشورے سے لے لیا تھا۔ جس کے لیے

میں -/32000 جو لاکھ تیس ہزار و سول کہے تھے۔ جس میں -/32000

بایچ لاکھ تیس ہزار روپے سکول جو کھیار اول خان نے میرے حوالے کیے تھے

اور باقی ایک لاکھ روپے میں نے خود وصول کیے تھے۔ یہ سارے رقم میں نے

خرچ کیے ہیں۔ شامل ضمن

Umar Khitab

عنایت الرحمن PSHT جی ایس پی سی منڈی

18-6-2019

Attested

Umar Khitab

Umar Khitab  
Advocate

Umar Khitab  
ADVOCATE

بیان حلفی Annex 53

میں سٹی اول خان ولد شاہ زمان خان مسکنہ چڑی رہا۔  
 قومی شناختی کارڈ نمبر 7-15601-1014698-1014698-7 جو ایڈار CPS چڑی رہا۔  
 مکمل ہذا میں 08/08/1989ء سے تاحال فرائض منصبی انجام  
 دے رہا ہوں۔ اقرار کرتے ہوں کہ سابقہ ہیڈ ٹیچر عبدالسلام نے  
 مجھے بینک چیک بک اور سٹیبل سٹیپ کے حوالے بتایا کہ  
 کام شروع کریں۔ میں چیک کو ہیڈ ٹیچر عبدالسلام سے تہہ کرنے  
 یعنی رقم خود عبدالسلام کے ہتھ میں جو کہ بعد میں وہ چیک میں چسپ میں  
 محمد امین خان سے دستخط کروا کر بینک سے رقم نکلا۔  
 مختلف چیکوں کے ذریعے میں نے 5 لاکھ 32 ہزار روپے تک  
 رقم بینک سے نیکل کر مدرسہ عنایت الرحمن PST CPS چڑی  
 کے حوالے کیا ہیں۔

اس کے بعد میں نے چیک بک اور سٹیپ کو عنایت الرحمن

PST CPS چڑی کے حوالے کیا۔

اول خان

اول خان ولد شاہ زمان خان  
 جو ایڈار CPS چڑی  
 15601-1014698-7  
 03439425764

مواکل نمبر

مکمل ہذا

Attested

Signature  
 Headmaster,  
 Govt. Primary School,  
 Govt. Billo, District, Chiniot.

etc

Umar Khitab  
 ADVOCATE



Annex:K

54 (24)

Office of the Enquiry Officer/ Principal GHS Kanju Swat.

NO 1502 /

Dated 3/7/2019

To

*[Handwritten signature]*

The District Education Officer (M),  
Distt; Swat.

Subject: Enquiry Report against Mr. Abdussalam Ex-PSHT  
GPS Charai Beha .

Sir,

Reference to your office Endst;No.2557/G.File/PTC dated 21-04-2019, the enquiry report against Mr. AbdusSalam Ex-PSHT GPS Charai Beha presently working as CT at GHS Beha Swat , is here by submitted for your kind information/further necessary action please.

*[Handwritten signature]*  
3/7/2019

Hamid Ul-Haq  
Enquiry officer / Principal  
Govt; High School Kanju  
Swat.

*my report sb  
put up in file  
[Handwritten signature]  
08/7/19*

*[Handwritten signature]*  
Umar Khitab  
ADVOCATE

*ADEO (PY)*

*Put up on file*

*[Handwritten signature]*  
08-7-19

# ENQUIRY REPORT.

55

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(Page 1/5)

Enquiry report in view of the DEO (M) Swat Endst: No 2557/G.File/PTC Dated 21- 04-2019, against Mr. Abdusalam Ex- Head Teacher GPS Charai Beha Swat (Presently serving as CT at GHS Beha Swat)

1. Enquiry Officer:
2. Date of Enquiry:
3. Place of enquiry:
4. List of defense witnesses
5. List of documents

*Handwritten signature*

**Hamid ul Haq**  
Principal GHS Kanju Distt: Swat.

18-6-2019

GPS Charai Beha Swat.

- 1- Head Teacher GPS Charai Beha Swat.
- 2- Teacher of GPS Charai Beha Swat..
- 3- Ex-Chairman & members of PTC
- 1- Questionnaires from Abduslam Ex-PSHT GPS Charai Beha Swat.
- 2- Statements of the Teachers, Ex-Chairman & members of PTC.
- 3- Report of the School Head Teacher.
- 4- Bank Statement from July 2014 to April 2018.
- 5- Statement of the Bank Manager NBP Matta.
- 6- Statement of Chawkidar.

In compliance with orders of the DEO (M) Distt: Swat. vide his office Endst; No 2557/G.File/PTC dated 21- 04-2019 which was received on 14- 06-2019. The enquiry was conducted on 18th of June 2019 at GPS Charai Beha Swat , in order to probe into the allegation leveled against Mr. Abduslam Ex-PSHT GPS Charai Beha Swat (Presently serving as CT at GHS Beha).

I, the undersigned paid visit to the said School on 18-6-2019 along with my school CT teacher Mr. Haider Ali , for which I had already informed all the persons concerned to ensure their presence. Mr. Liaqat Ali PSHT GPS Charai Beha Swat, Mr. Inayatur Rahman PST teacher of the School, Chawkidar of the School, Ex Chairman of PTC along with the members & present Chairman of PTC were present . While Mr. Abduslam Ex- PSHT GPS Charai Beha came late.

I gave questionnaires to Mr. Abduslam Ex-PSHT GPS Charai Beha (See page No.10 ), enquired from Mr. Muhammad Amin Ex- Chairman and other members of PTC GPS Charai Beha ( For session 2014 to 2017) and took statements from them. ( see pages No.14&15). I also enquired from present Head Teacher of the school Mr Liaqat Ali PSHT, Mr.Inayatur Rahman PST teacher of the school and Awal khan Chawkidar of the School and took statements from them (See pages No.11to13 ). I also examined the Bank statement from 2014 to 2017 (During the stay of Mr. Abduslam Ex-PSHT at GPS Charai see pages No.7 & 8 ) and the construction at GPS Charai Beha by Mr. Abduslam.

*Handwritten signature*

**Umar Khitab**  
ADVOCATE

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view of the questionnaire / statements obtained from all of them, bank statement and reconstruction work. The findings for mentioned allegations are as under:

Mr. Abduslam Ex-PSHT remained at GPS Charai Beha Swat from 14.11.2014 to 2.12.2017.

2- According to the bank statement the following amount has been allotted / given in this period from 10.11. 2014 to 28.11.2017(See page No.7):

Date	Amount	Amount allotted for	Remarks
10.7.2014	Rs.21000 /-	Petty repair	
10.2.2014	Rs.21000/-	Petty repair	
27.5.2015	Rs.562000/-	Boundary wall	Conditional grant
18.3.2016	Rs.10000/-	Stationary	
31.3.2016	Rs.10000/-	Stationery	
30.6.2016	Rs.335000/-	<i>جنگل</i>	This amount has been re-transferd to GPS Chatikal Matta Swat. Account number 4085633343 on 29.9.2016. ( see pages No.9 )
9.1.2017	Rs.670000/-	Rs.200000/- for water supply. Rs.470000/- for B/wall	Conditional grant
9.1.2017	Rs.160000/-	Group Latrine	Conditional grant

Total amount according to the Bank statement = Rs. 1789000/-  
 Amount re- transferred to GPS Chatikal Matta swat. = Rs. 335000/-  
 Total Amount allotted to GHS Charai Beha = Rs. 1454000/-

3- Amount drowned:

S. No.	Date	Amount
1-	9.4.2015	Rs.42000/-
2-	27.7.2105	Rs.562000/-
3-	10.5.2017	Rs.18000/-
4-	17.10.2017	Rs.200000/-
5-	23.10.2017	Rs.200000/-
6-	26.10.2017	Rs.200000/-
7-	15.11.2017	Rs.100000/-
8-	28.11.2017	Rs.132000/-

Total amount drowned = Rs.145000/- ( See pages No.7 )

*Umar*  
Umar Khitab  
ADVOCATE

School doesn't have PTC record of that time. There is also neither cash book, voucher file, meeting minutes / proceedings register nor stock register. Some scattered bills were brought by Mr. Inayat Ur Rahman PST from his home, but there were no signatures on them. ( see page No.11 )

5- According to the Ex- Chairman PTC committee, "I had been invited only for two meetings. Signatures were taken from me on all cheques, Mr. Awal Khan Chawkidar of the school would bring cheques to my home and would take signatures from me on the them. As I was illiterate, so I didn't know about the amounts on the cheques, neither I know about any construction nor have I any signatures on receipts or bills." (See page No.14 )

6- According to PTC members, they were invited only for one meeting in which approval was given for the construction of bridge on the stream and then they were not invited for any other meeting and furthermore no consultation was done with them in any construction work. (See page No.15 )

7- For the first time for boundary wall RS.562000/- were allotted/given on 27.05.2015, which were withdrawn on single cheque on 27.07.2017. A small bridge was built on a stream across the school from the fund which had been allotted for the boundary wall and on the rest of the fund boundary wall was initiated, but that hasn't been completed. On 9<sup>th</sup> November, 2017, again RS.470000/= were allotted/ given for the boundary wall, which according to Abdusalam, the amount been spent on the boundary wall. But that is still incomplete. Approximately 90% work has been done and 10% is left. As this area is mountainous and the school area is uneven, so therefore retaining-walls / revetment were built and then rest of the work was done with bricks. Main gate of the school has been fixed. The length of the boundary wall is about 399 feet. As there is no record, therefore actual expenditures are difficult to guess. But with the help of some construction experts, we have estimated the following expenditures:

1- Retaining wall	=	Rs.514365/-
2- Brick wall & main Gate	=	Rs.338329/-
3- Bridge constructed	=	Rs.80000/-
<u>Total expenditures (Estimated)</u>	=	<u>Rs.932694/-</u>

*[Handwritten signature]*

Amount allotted for Boundary wall on 27.5.2015	=	Rs.562000/-
<u>Amount allotted for Boundary wall on 9.1.2017</u>	=	<u>Rs.470000/-</u>
Total amount allotted for Boundary wall	=	Rs.1032000/-
<u>Total expenditures (Estimated) on boundary wall</u>	=	<u>Rs.932694/-</u>
Remaining amount (recoverable)	=	Rs.99306/-

*[Handwritten signature]*  
**Umar Khitab**  
ADVOCATE

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According to Mr. Abduslam Ex-PSHT of GPS Charai Beha. "from the allocated amount Rs.6320000/- he had spent on boundary wall at the hands of Inayat-Ur-Rahman PST, GPS Charai Beha. And according to the statement of Mr.Inayat Ur Rahaman, he has spent the said amount on boundary wall (See page No.12 ). He brought some scattered bills from his home amounting to Rs.583280/- ( Photo copies attached on page No. 16 to 21 ). If we accept these bills and subtract them from the amount given to Mr.Inayat ur Rahaman Rs. 6320000/- Rs.48720/- is left, which is recoverable from Mr. Inayat ur Rahaman. This amount is included in the amount at para No. 7 of this report.

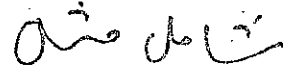
9- For group latrine Rs.160000/- were allotted / given on 9<sup>th</sup> January, 2017, which were withdrawn from bank. But group latrine was not built. The construction of a single latrine had been started, but has been left unfinished. The expenditure on the construction done would be approximately ten thousand rupees. So if we subtract Rs.10000/- from Rs.160000 so we will have Rs.150000/- which is recoverable.

10- According to ASDEO (PND) Rs.200000/- out of Rs.670000/- had been allotted/given for water supply on 09 - 01-2017. But no work has been done in this regard. Therefore, Rs.200000/- is recoverable.

11- For petty repair, twice Rs.21000/- were allotted/given on 10/07/2014 & 10/02/2015. This fund Rs.42000/= for repair was withdrawn on a single cheque and has been spent on the repair of floor and on painting & decoration. From this fund, Rs.13000/= were given to Mr. Awal Khan, Chawkidar of the school for purchasing a gun, but the gun hasn't been bought so far. Therefore, Rs.13000/- should be recovered from Mr. Awal Khan.

12- Rs.20000/- were allotted for stationary (RS.10000/- on 18-3-2016 & Rs.10000/- on 31-3-2016) but neither stationary was purchased, nor any bill was produced in this regard. So this amount is recoverable.

**Conclusions:**



1. The following amount should be recovered from Abdul Salam Ex-PSHT GPS Charai Beha (Presently Serving as CT at GHS Beha) for depositing in the PTC account of GPS Charai Beha.

I) In para No.7 recovery regarding boundary wall =	Rs.99306/-
II) In para No.9 recovery regarding group latrine =	Rs.150000/-
III) In para No.10 recovery regarding water supply =	Rs.200000/-
IV) <u>In para No.12 recovery regarding Stationary =</u>	<u>Rs.20000/-</u>
Total amount =	Rs.469306/-
Recovery from Mr.Inayatur Rahman at para 8 of this report.	= (-) Rs.48720/-
<u>Total recovery from Abdul Salam Ex-PSHT =</u>	<u>Rs.420586/-</u>

  
**Umar Khitab**  
 ADVOCATE

  
 GPS Charai Beha  
 P.T.C. Account

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- 2. Amount Rs.48720/- should be recovered according to para 8 of this report, and deposit it in the PTC account of GPS Charai Beha.
- 3. Rs.13000/- which had been given to Mr. Awal Khan Chawkidar of the school for buying a gun , should be recovered and deposited in the PTC account of GPS Charai Beha.

3/7/2019

Hamid Ul Haq  
Enquiry officer / Principal  
Kanju Distt: Swat

Umar Khitab  
ADVOCATE



OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) SWAT

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28

No. 8522 /Enquiry/File/GPS:C.Beha Dated 5/8 /2019

To,

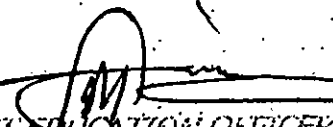
The Head Master,  
GHS: Beha District Swat.

Subject:- Conditional Grant

Memo:

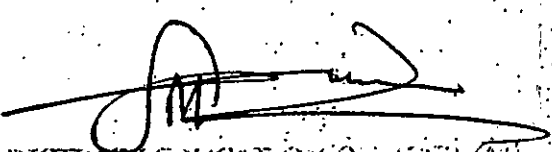
Consequent upon the recommendations of enquiry officer you are directed to recover the amount of Rs: ~~4693057~~ from Mr. Abdul Salam Ex-IPST GPS: Charai Beha present Serving as CT at GHS: Beha District Swat and deposit the same into PTC Fund Account the photo copy may be sent to this office for record.

Encl: No. 8523-30

  
DISTRICT EDUCATION OFFICER (M)  
SWAT

Copy forwarded for information to:-

1. The Director of Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner District Swat.
3. The DMO Swat.
4. The Sub Divisional Education Officer (M) Mulla District Swat.
5. The Head Teacher Concerned.
6. P.A to District Education Officer (M) Swat local Office.
7. The IMU Branch Local Office.

  
DISTRICT EDUCATION OFFICER (M)  
SWAT

  
Umar Khitab  
ADVOCATE

BEETER COPY

Anna K  
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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALEO SWAT.

No.8522/Enquiry /File/GPS Beha Dated 5/8/2019.

To

The Headmaster

GHS: Beha District Swat.

Subject:- CONDITIONAL GRANT.

Memo:

Consequent upon the recommendations of enquiry officer you are directed to recover the amount of Rs.469306/-

From Mr. Abdul Salam Ex PHST GPS: Charai Beha present serving as

CT at GHS : Beha District Swat and deposit the same into PTC Fund

Account the photo copy may be sent to this office for record.

DISTRICT EDUCATION OFFICE(M)

SWAT.


Endst:No. 8523-30

Copy forwarded for information to the:-

- 1.The Director of Elementary and Secondary Education Khyber Pukhoonkhawa Peshawar.
- 2.The Deputy Commissioner Swat.
- 3.The DMO SWAT
- 4.The Sub Divisional Education officer(M) Matta District Swat.
- 5.The Head Teacher concerned.
- 6.PA to District Education Officer (M) Swat local office.
- 7.The IMU Branch local office.

DISTRICT EDUCATION OFFICER(M)  
SWAT.

Collect

  
Umar Khitab  
ADVOCATE

  
Umar Khitab  
ADVOCATE



Annex: M

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OFFICE OF THE DISTRICT EDUCATION OFFICER  
SAIDUSHRIF SWAT.  
Phone No.0946-9240228.  
MALE

**NOTIFICATION.**

**I. Whereas** Mr. Abdul Salam EX PSHT GPS Charai Beha Now CT GHS Beha Swat, was proceeded against the Khyber Pakhtunkhwa Government servant (Efficiency & Discipline) Rules 2011 for the charges mentioned in the show cause notice.

- (1) That as per report of the IMU Swat as a special case GPS Charai Beha Swat an amount Rs.1789000/- received by Head Teacher GPS Charari Beha for different developmental work from May 2014 to February 2017. The Ex Head teacher Mr Abdus Salam now stationed CT in GHS Beha withdrawn all amount without completing any of work.
- (2) Whereas, the undersigned has been nominated Mr Hamidul Haq Principal GHS Kanju Swat as enquiry officer vide this office letter No 2557, dated 21/04/2019.
- (3) Whereas you were allocated Total amount 1789000/- on account of conditional grant for the year 2014 to 2017.
- (4) Whereas you were issued a show cause notice vide No 3172-73 dated 19/10/2019 on his home and school address.
- (5) Whereas the amount of Rs.335000/- has been transferred to GPS Chatikal Matta bearing account No 4085633343 dated 29/09/2016.
- (6) Whereas net amount has been allotted to GPS Charai Beha Swat Rs.1454000/- according to this office conditional grant record.
- (7) According to the report of the Principal GHS Kanju Swat the sum of Rs.469306/- may be deposited in to the school PTC account for completion of the remaining work, but you have not deposited the same amount up till now.
- (8) Whereas his reply to the show Cause notice dated 28-10-2019 was found unsatisfactory.
- (9) Whereas the District Education Officer (M) Swat being competent authority after having considered the charges and evidences on record against him as proved.
- (10) Now, Therefore I Muhammad Amin District Education Officer (M) Swat being competent authority under E & D rules 2011 do hereby impose upon him " the major penalty of **"REMOVAL FROM SERVICE"** under 4 (b) (iii) of the ibid rules, due to non-recovery of amount Rs.469306 with effect from 1/11/2019 in the interest of public service.

(MUHAMMAD AMIN)  
DISTRICT EDUCATION OFFICER (M) SWAT

Endst: No

5066-72

Dated: 28/11/2019

Copy for information and necessary action to: -

1. The Director Elem & Secondary Education ;KPK Peshawar.
2. The DDEO (M) Swat.
3. The Head Master GHS Beha Swat w/r to his no cited above.
4. Mr. Abdus Salam EX PSHT GPS Charrai Beha Now CT GHS Beha R/O Kharirai Matta Swat.
5. The Official concerned.
6. The PA to local Office.
7. DMO Swat

DISTRICT EDUCATION OFFICER (M)  
SWAT

Umar Khitab  
ADVOCATE



OFFICE OF THE DISTRICT EDUCATION OFFICER  
SAIDUSHRIF SWAT.  
Phone No.0946-9240228.  
MALE

**SHOW CAUSE NOTICE**

I Muhammad Amin District Education officer (M) Swat under the Khyber Pakhtunkhwa, Government servant (efficiency & Disciplinary) Rules, 2011 do hereby serve upon you Mr Abdus Salam Ex PSHT GPS Charrai Beha now CT GHS Beha District Swat as show cause notice as follows:-

- (1) That as per report of the IMU Swat as a special case GPS Charai Beha Swat an amount Rs.1727000/- received by Head Teacher GPS Charari Beha different developmental work from May 2015 to February 2017. The Ex Head teacher Mr Abdus Salam now stationed in GHS Beha withdrawn all amount without competing any of work.
- (2) Whereas, the undersigned has been nominated Mr Hamidul Haq Principal GHS Kanju Swat as enquiry officer vide this office letter No 2557 dated 21/04/2019.
- (3) Whereas you were allocated Total amount 1789000/- on account conditional grant for the year 2014 to 2017.
- (4) Whereas the amount of Rs.335000/- has been transferred to GPS Chatikal Matta bearing account No 4085633343 dated 29/09/2016.
- (5) Whereas net amount has been allotted to GPS Charai Beha Swat Rs.1454000/- according to this office conditional grant record.
- (6) According to the report of the Principal GHS Kanju Swat the sum of Rs.469306/- may be deposited in to the school PTC account for completion of the remaining work, but you have not deposited the same amount up till now.
- (7) in exercise of the powers conferred upon me under sub section 4 of section 5 of Khyber Pakhtunkhwa Efficiency and Discipline Rules, 2011 the undersigned in the capacity of competent authority is hereby pleased to impose upon you the major penalty of removal from service under the ibid rules in the light of formal enquiry already conducted. You are required to furnish your reply within 7 days after delivery of this show cause, that why not the afore said penalty should be imposed upon you.

If your reply to this office is not received within 07 days of its delivery, it shall be presumed that you have no defense to put in and in that case Ex-parte action shall be taken against you.

(MUHAMMAD AMIN)  
DISTRICT EDUCATION OFFICER (M)  
SWAT

Dated: 18/10/2019

Endst: No 317293

Copy for information and necessary action to:-

1. The Director, Elem & Secondary Edu, Pk Peshawar.
2. The District Mentoring Officer Swat.
3. The Head Master GHS Beha Swat w/r to his no cited above.
4. Mr. Abdus salam Ex PSHT GPS Charai Beha Now CT GHS Beha Swat.
5. The SDEO(M) Matta Swat
6. The PA to local Office.

DISTRICT EDUCATION OFFICER (M)  
SWAT

Under Khitaw  
ADVOCATE

Received on  
25/10/2019  
Head Master  
Govt: Hig. School  
Bha Matta Distt: Swat

محترم جناب ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور۔

عنوان۔ محکمانہ اپیل برخلاف برطرفی ملازمت ارڈرنمبر 72-5066 مورخہ 28/11/2019۔

جناب عالی۔ مدعی حسب ذیل درخواست پیش کرتا ہے۔

1۔ یہ کہ مدعی مورخہ 05/03/1992 کو بحسبیت PST بھرتی ہوا تھا۔

2۔ یہ کہ مدعی 14/11/2014 سے 29/11/2017 تک بحسبیت PHST گورنمنٹ

پراہمری سکول چڑی بہامٹہ سوات میں ڈیوٹی سرانجام دے رہا تھا۔

3۔ یہ کہ مدعی کا تبادلہ بحوالہ ارڈرنمبر 181-182 مورخہ 30/11/2017 کو گورنمنٹ

پراہمری سکول اعلیٰ کو ہوا ہے۔

4۔ یہ کہ مدعی کو CT پوسٹ پر ترقی دیکر گورنمنٹ ہائی سکول بہامٹہ میں تبادلہ کر دیا گیا۔

5۔ یہ کہ مدعی کے خلاف لیاقت علی PHSTGPS Charai Beha Matta Swat

نے ایک من گھڑت شکایت DEO(M) Swat کو ارسال کیا۔ کہ مدعی نے conditional Grant

کے بجٹ میں کرپشن کیا ہے۔

6۔ DEO (M) Swat نے مدعی کے خلاف انکوائری شروع کر کے جناب حمید الحق پرنسپل گورنمنٹ

ہائی سکول کانبجو کو انکوائری افسر مقرر کیا۔

7۔ یہ کہ انکوائری افسر نے انکوائری کو مکمل کیا ہے۔

8۔ یہ کہ DEO(M) Swat، بنک سٹیمپٹ اور انکوائری رپورٹ کے صفحہ نمبر 2 کے مطابق مدعی کے سکول کو

Rs.14,54,000/ بجٹ دیا گیا تھا۔ انکوائری رپورٹ کے صفحہ نمبر 3 فقرہ نمبر 7 میں مدعی نے -/932694 Rs.

نے خرچ کیا ہے اور اس صفحہ پر ہی مدعی سے /99306 Rs. ریکوری کے سفارش کیا گیا ہے۔ اور اس طرح صفحہ

نمبر 4 فقرہ نمبر 8 پر عنایت الرحمن نے -/5,83,280 Rs. خرچ کیا ہے۔ اس صفحہ پر ہی عنایت الرحمن سے

-/48720 Rs. ریکوری کے سفارش کیا گیا ہے۔ اس طرح فقرہ نمبر 9 گروف لیٹرین میں /1,50,000 Rs.

کے ریکوری کے سفارش کیا گیا ہے اور -/10,000 Rs. خرچ کیا گیا ہے۔ فقرہ نمبر 10 میں /2,00,000 Rs.

وائٹ سپلائی کے مد میں ریکوری کے سفارش کیا گیا ہے۔ حالانکہ مدعی نے سابقہ ASDEO محمد گل سرکل منٹ

کے حکم پر شاہ دوران پی ایس ٹی GPS Mandoor Matta کو -/2,00,000 Rs. کیش حوالہ

کیا تھا۔ فقرہ نمبر 11 میں -/Rs.42,000 خرچ کئے گئے ہیں۔ اس فقرہ میں چوکیدار سے بندوق کے مد/13000

ریکوری کے سفارش کیا گیا ہے۔ فقرہ نمبر 12 میں -/Rs.20,000 شیشیزی مد میں ریکوری کے سفارش کیا گیا ہے۔  
DEO(M) Swat مدعی سے مبلغ -/4,69,306 ریکوری کا حکم دیا ہے جبکہ انکو اہری افسر نے مبلغ -/4,20,586  
کا سفارش کرتا ہے۔ (ڈی ای او، بینک سٹیٹ اور انکو اہری رپورٹ کے مطابق ٹوٹل -/14,54,000 بجٹ دیا گیا  
ہے۔۔ انکو اہری رپورٹ کے مطابق خرچ شدہ رقم 15,67,974 ریکوری رقم 5,44,026 (مدعی سے  
مبلغ -/4,69,603 عنایت الرحمن سے مبلغ -/48,720 اول خان چوکیدار سے -/13000 ٹوٹل ریکوری  
-/5,44,026)

9- یہ کہ مدعی نے مورخہ DEO(M) Swat 19/9/2019 کو دوبارہ انکو اہری کے استدعا کیا گیا نے  
لیکن DEO(M) Swat نے درخواست کو نامنظور کیا ہے۔ مدعی نے اپ صاحبان کو دوبارہ انکو اہری کیلئے  
درخواست ارسال کیا گیا ہے۔ لیکن وہ بھی نامنظور ہوا ہے۔

10- یہ کہ DEO(M) Swat نے مورخہ 28/10/2019 مدعی کو بے انصافی اور غیر قانونی انکو اہری  
کے روشنی میں شوکا ز نوٹس جار کیا ہے جس کے جواب مدعی نے مورخہ 19/10/2019 کو دے دیا۔

11- یہ کہ DEO(M) Swat نے بحوالہ ملازمت سے برطرفی کا آرڈر نمبر 72-5066 مورخہ 28/11/19  
مدعی کو جاری کیا۔

12- DEO(M) Swat نے مدعی کو سنے بغیر ملازمت سے غیر قانونی، قواعد و ضوابط کو بالائے طاق  
رکھتے ہوئے برطرف کیا ہے جو کہ ایک ملازم کے ظلم اور زیادتی ہے۔

لہذا اپ صاحبان سے استدعا اور درخواست ہے کہ DEO(M) Swat کے برطرفی کے آرڈر  
نمبر 72-5066 مورخہ 28/11/2019 کو واپس لیکر مدعی کو ملازمت پر بحال کر کے مشکور  
فرمائیں۔ (انکو اہری رپورٹ، بیان حلفیوں، جواب شوکا ز نوٹس کا جواب، دوبارہ، انکو اہری کے

درخواستیں، بینک سٹیٹ منسلک ہیں)

العبد

مدعی عبدالسلام

مورخہ 2/12/2019

No. 518 RPL12-67971

Rs. Ps.

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Stamps affixed except in case of  
uninsured letters of not more than  
the official weight prescribed in the  
Post Office Guide or on which no  
acknowledgment is required.

Date Stamp

\*Write here "letter", "postcard", "packet" or "parcel"  
with the word "insured" before it when necessary.  
(in words)

Weight Kilo  
and Grams

1898-99

Post Office

Swat

66

Annex! 0

To

The District Education officer M Swat.

Subject:- REPLY OF SHOW CAUSE NOTICE.

R/Sir,

Reference your office No,3172-73 dated 19/10/2019( received on 25/10/2019) on the subject cited above.The reply of the show cause notice is below.

1.That the appellant was performed his duty as PHST (Primary Head School Teacher)at GPS Charai Beha Matta Swat with effect from 14/11/2019 to 29/11/2019.

2.That the appellant was transfer from Government Primary School Charai Beha Matta Swat to Government Primary school Aghal Matta Swat vide No,181.182 dated 30.11.2016.

3.That the appellant was promoted to CT post at Government High school Beha Matta Swat vide order No,13358 dated 28/2/2019.

4.That the DEO M Swat transfer various amount to the Account of Government Primary School Charai Beha Matta Swat the detail are be low:-

, Rs.21,000/- dated 10/2/2014, Rs.21,000/- dated

UAC

  
Umar Khitab  
ADVOCATE

10/7/2014 Rs.5,62,000/- dated 18/3/2016, Rs.10,000/-  
dated 31/3/2016, RS.10,000/- Dated  
18/3/2016. Rs.6,70,000/- dated 9/1/2017 Rs.1,60,000/-  
dated 9/1/2017, However, the amount

Mention above was for the purpose of stationary, Petty  
Repair and other construction works.

5. The appellant utilized amount Rs.6,25,730/- under the  
rules, with the consultation of Parents Teachers council  
committee spent the amount on stationary, Petty Repair  
and construction work.

6. The Awal Khan chowkidar GPS Charai Beha Matta cash  
the cheque of amount.632000/-from NBP Matta Swat  
and handed over the amount to Inayatpur Rahman PST of  
the said school.

7, The Enquiry officer the statements of the Inayatpur  
Rahman PST and Awal Khan chowkidar of said school. The  
Inayatpur Rahman PST and Awal Khan chowkidar of school  
fully supported the version of appellant.)

8. That the amount Rs. 2,00,000/- was the water supply  
scheme for Government Primary School Charai Beha  
Swat. But it is pertained to be noted that the concern  
school need not the water supply therefore, under the  
direction of Muhammad Gul EX ASDEO Matta circle the  
cash amount Rs.2,00,000/- was given to the Shah  
Dawran PST GPS Mandoor. But the Inquiry officer did not  
take the statement of Mr. Shah Dawran PST GPS Mndoor  
Matta Swat and nor statement of Muhammad Gul EX  
ASDEO Circle Matta.

UTC

  
**Umar Khitab**  
ADVOCATE

9. That Laiqat Ali PHST GPS Charai Beha Matta Swat submit falsely complaint against the appellant to High up of departments. In fact the appellant having full proof in respect of the work in shape receipts, vouchers, bills and minutes of meeting of partents Teachers Council Committee. The whole amount transferred to the account of Government Primary school Charai Beha Matta Swat was Rs.14,54,000/-. In the whole amount the Rs.2,00,000/- were given under the direction of Muhammad Gul Ex ASDEO Matta Circle. While the Rs.6,32,000/- were utilize by for the specified work the and remaining amount Rs.6,25,730/- were spent under the supervision of the appellant. The amount Rs.6,25,730/- were utilized in shape stationary, petty Repair and construction work. The proof in shape of receipts, bills, vouchers minutes of PTC Committee is available from the records.

10. That the Enquiry officer considered whole amount of both year 2014-15 and 2016-17, Rs. 10,32,000/- which include the amount of Rs.5,62,000/- for the year 2014-15 and the amount of Rs.4,70,000/- for the year of 2016-17. The above amount was for the construction of boundary wall while from the *Hamidul Haq Enquiry officer* recommended for the recovery of Rs.99306/-

11. Mr. Inayat ur Rahman PST GPS Charai Beha Matta Swat received the amount Rs.6,32,000/- for the boundary wall out of Rs.10.32,000/- ( Boundary wall and group literan)

4/

  
**Umar Khitab**  
 ADVOCATE

69

12. That the appellant paid to Mr. Inayat Rahman PST GPS Charai Beha Matta Rs. 4,70,000/- for the boundary wall and Rs. 1,60,000/- for the group laterin. Therefore, the appellant has no concern with the amount Rs. 6,32,000/- It is pertinent to be noted that Mr. Inayat Rahman PST GPS Charai Beha Swat himself recorded statement/ Affidavit in respect of the receiving Mr. Inayat Rahman PST GPS Charai Beha Matta Swat is liable for the amount/Recovery.

13. That the Enquiry officer stated in para No. 8 of his enquiry about the amount Rs. 6,32,000/- which include the amount of Rs. 1,60,000/- for group laterin. The Respondent No. 5 recommended the recovery of amount Rs. 48,720/- from Mr. Inayat Rahman PST GPS Charai Beha Matta Swat.

14. That the Inquiry officer stated in para No. 9 about group laterin of Rs. 1,60,000/- and recommended Rs. 1,50,000/- from the appellant. However, it is to be noted that group laterin amount Rs. 1,60,000/- is included in the total amount of Rs. 6,32,000/- The recovery of Rs. 1,50,000/- from the appellant out of Rs. 6,32,000/- is unjustified.

<sup>15</sup>~~13~~. That the para No. 10 of the Enquiry officer is against the facts and law. Because Department/ ASDEO (P&D) had not given to the appellant the amount of Rs. 2,00,000/-. It is pertinent to mention here the amount for water supply was given to Shah Dawran PST GPS

CTC


  
Umar Khitab  
ADVOCATE



Mandor Matta Swat on the direction Muhammad Gul Ex  
ASDEO Circle Matta Swat.

It is therefore, requested to accept my reply and the  
office order No.8522 dated 5/8/2019 set aside please.

Your, s obedient

Abdul Salam CT 

GHS Beha Matta Swat.

Dated 28/10/2019.

Dairy No, 2655

28/10/2019

UC

  
Umar Khitab  
ADVOCATE

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHWA PESHAWAR.

Abdul Salam EX CT Government High School Beha Matta Swat.....Appellant.

Versus.


District Education Officer Elementary and Secondary Education  
Swat and others .....Respondents.

APPLICATION FOR SUSPENSION OF IMPUGNED ORDER NO.5066-72 DATED  
28/11/2019 TILL THE DISPOSAL OF THE INSTANT APPEAL.

Respectfully Sheweth.

1. That the instant appeal has been filed before this  
Honorble Tribunal the date not has been fixed.
2. That the appellant has prima face case.
3. That the Balance of inconvenience is also in favour of appellant.
4. That till of the disposal of instant appeal the impugned Order No.5066-72  
dated 28/11/2019 is not suspended the appellant will suffer irreparable  
loss.

On the acceptance of instant application the impugned order 5066-  
72 Dated 28/11/2019 may kindly be suspended till the disposal of instant  
Appeal.

  
Abdul Salam.....Appellant.

BEFORE THE SERVICE TRIBUNAL KHYBER PULHTOONKHAWA PESHAWAR.

Service appeal No \_\_\_\_\_

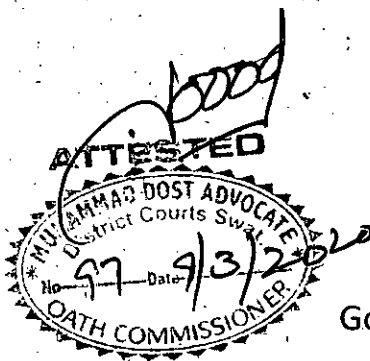
Mr. Abdul Salam EX C.T. Government High School Beha Matta Swat..... Appellant.

Versus.

1. District Education Officer ( Male) Saidu Sharif Swat & Others ...Respondents.

AFFADAVIT.

It is stated on oath that all the contents of this application  
Are true and correct to the best knowledge and belief. Moreover, no such  
Like application is pending before this Honorable Tribunal.




Deponent. *[Signature]*  
Abdul Salam EX CT

Government High School Beha Matta Swat.

 <p>بار کونسل نمبر: 1058-18-65 بار ایسوسی ایشن نمبر: 425 رابطہ نمبر: 7656 776 376 53</p>	  <p>61876 سرٹیفکٹ نمبر: 71</p>
<p><b>ڈسٹرکٹ بار ایسوسی ایشن سوات</b></p>	

بعدالت جناب: **محمد رفیق ریسٹریٹڈ** صاحب نے درخواست کی ہے کہ اس کی درخواست کو منظور کیا جائے اور اس کی ذمہ داری سونپ دی جائے۔

<p>منجانب: <b>ایم اے ایم ایف</b></p>  <p>عبداللہ بنام <b>DEO</b> ورنہ لکھو</p>	<p>دعویٰ اور خواست: <b>لکھو</b></p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
<p><b>بامث تحریر آگے</b></p>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام **محمد رفیق ریسٹریٹڈ** کیلئے **عبداللہ بنام** کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے دعویٰ، جواب دعویٰ، اقبال دعویٰ، اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہتھارہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداخت منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی نسبت سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سندر ہے

Accepted

محمد رفیق ریسٹریٹڈ

ایڈوکیٹ دستخط:

عبداللہ بنام ایم اے ایم ایف

## DETAIL OF THE BUDGET.

10/07/2014.( 2014-15)	Rs. 21000/-	Petty Repair.
10/2/2014 ( 2013-14)	Rs. 21000/-	--do-
27/05/2016 ( 2014-15)	Rs. 5,62,000/-	Boundary wall
18/03/2016( 2015-16)	Rs. 10,000/-	Stationary.
31/3/2016 ( 2015-16)	Rs. 10,000/=	---do---
09/01/2017 ( 2016-17)	Rs. 6,70,000/-	(Rs. 470000/ B/wall and 200000/- for water supply.)
9/01/2017( 2016-17)	Rs. 1,6000/-	( group litrin)
TOTAL Budget.	14.54.000/-	—

## Expenditure.

Expenditure Appellant.	932694/-
Expenditure from Respondent No.7	583280/-
Group litrin.	10,000/-
Petty Repair.	40,000/-
Total Expenditure.	15,67,974/-

Recovery from appellant.	4,69,306/-
Recovery from Respondent No:7.	48,720/
Recovery from Respondent No, 8.	13000/-
Total.	5,31,026/-

Recovery 5,31,026/- +15,67,974/- Total. 20,99000/-

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHAW PESHAWAR.

Service appeal No.1719/2020.

Abdul Salam C.T. Government Primary school charai Beha Matta Swat.....Appellant.

Versues.

1.District Education Officer Male Swat and others.....Respondents.

REJPINDER FROM THE APPELLANT IN RESPECT OF COMMENTS FILED BY THE RESPONDENTS NO.1 TO 3 AND 7 TO. 10.

1. That para,s 1 to 8 need nor for replies.
2. As para,s No, 9 and 10 of the replies are concerned the Rejoinder is this regard is submitted below.

3.The appellant submitted a application dated 28/01/2021 to Manager National Bank Matta for collection of the photo copies of the following cheque and another application submitted to Respodent No,1 for collection of the photo copies of the voucher/ receipts of Rs.5,83,280/- expenditure by Respondent No.7 but in vain.

<u>S.No.</u>	<u>Debit date.</u>	<u>Inst:No.</u>	<u>Amount.</u>
1.	10/05/2017	304201	18,000/-
2.	17/10/2017	304203	2,00,000/-
3.	23/10/2017	304204	2,00,000/-
4.	26/10/2017	304206	2,00,000/-
5.	28/10/2017	304209	1,32,000/-

4.It is submitted to direct the Respondent No.1 to collect the photo copies of the aforementioned cheques from the Manager N.B.P. Matta Swat and the Respondent No.4 submitted the photo copies vouchers/receipts of expenditure Rs.5,83,280/- which is in the custody by Respondent No.1.

5. That it is pertained to be noted that the expenditure record of Respondent No.7 of Rs.5,83,280/- in the custody in the Respondent No.1 office which are Annexure with enquiry report. But the Respondent No. 1 not Annexed the record with his comments.

6. The appellant submitted application dated 19/09/2019 for re enquiry / checking of vouchers/receipts of the appellant expenditure record but in vain. It is pertained to be noted that the Respondent No.4 not checked any record of the appellant.

7. That for the fair justice the above mentioned cheques and vouchers/receipts record as essential.

8. The para,s 11 to 14 need not for replies.

Abdul Salam .....Appellant.

خطاب ڈسٹرکٹ ایجوکیشن آفس (سرگودھا) ضلع سوات

درخواست مجرا دعوائی ریسیدوآت / ووٹرز کے فوٹو  
کا پتیاں

خطاب عالی! عدلیٰ حسب ذیل عرض کرتا ہوں۔

1۔ ہم کہ عدلیٰ ڈسٹرکٹ عالی سکول لیا مٹھ سوات میں نکیٹ  
سی۔ ٹی ڈیوٹی سر نام دے رہا تھا۔

2۔ ہم کہ عدلیٰ کے بعد خلاف ایک غیر قانونی / بے العافی پر  
بنی انگوائری ہو رہا تھا۔ جس کے بنا پر عدلیٰ کو ملازمت سے  
برخواست کیا گیا۔

3۔ ہم کہ عدلیٰ نے بے العافی بنی حکم کے خلاف صغیر سروس  
سٹیٹوٹل میں سروس اپیل 1719 دائر کیا۔

4۔ ہم کہ انگوائری رپورٹ کے مطابق عنایت الرحمن PS آ

ٹی۔ پی۔ ایس جیٹری لیا مٹھ سوات کے 1,33,000 روپے کے خرچ

کے ہیں۔ اس اخراجات کے ریسیدوآت / ووٹرز انگوائری رپورٹ

کے ساتھ منسلک ہیں۔ جو کہ آپ کے دفتر کا حصہ ہے۔ اور صغیر

سٹیٹوٹل کے ریکارڈ میں موجود نہ ہیں۔

لینڈ اسٹریٹ 2۔ تم Right to information Act 2013

Muhammad Ali  
Per Agent  
Submit to  
Court directly  
if available

جو کہ عدلیٰ کا قانونی حق ہے۔ اس اخراجات کے ریسیدوآت / ووٹرز  
کے فوٹو کا پتیاں میٹھا کیا جائے۔

محمد اسلام  
بذریعہ

محمد خطاب ایجوکیشن عالی کورٹ لیا مٹھ

11/1/2022



بیت صباب ۵۰۰ (D) میں محمد رفیع اور وٹا ٹوی لیم ہلال

کا دستوران: نظر ثانی پینل

کا

صبا عالی

گزارش ہے کہ جو دستوران میں ہوئی ہے۔ علم معینانہ ہوئی ہے  
میں غریبوں۔ اور میں سے گورنری نے ہے۔ میں بانی  
کر کے دوبارہ دستوران فوراً ہی جائے۔ کاغذات میں اس میں  
جو دستوران ہی والے آئے تھے۔ اس نے یہ کاغذات حضور کے تھے۔  
میں نے ان میں سے دوبارہ دستوران لیا ہے

القارض شامہ

عبدالستار C.T  
GHS بیٹا میں دستورات  
C.T

Umar Khitab  
ADVOCATE

D.R.  
Put up on  
File immediately.  
19/9/19

حساب نمبر ۵۰ (M.D) حیدرآباد و تانہوں کے لیے

کے متعلق: نظر ثانی کیلئے

۵۰

حساب نمبر ۱

مگر درستی ہے۔ کہ جو دستاویزیوں میں ہے۔ غیر مستند ہو کر  
میں غریبوں اور مسکینوں کو زیادتی نہ ہو۔ میری  
کے دوبارہ دستاویزیوں کو برقرار رکھنا۔ کاغذات  
جو دستاویزیوں والے آئے۔ ان کے ساتھ ساتھ  
میں غریبوں کو دوبارہ دستاویزیوں کیلئے

الغرض شکر

عبد اللہ (C.T)  
GHS میں سے دستاویزیوں  
etc

Umar Khirab  
ADVOCATE

D.A.  
Put up on  
File immediately  
for m-a  
19/9/18

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHAW PESHAWAR.

Service appeal No.1719/2020.

Abdul Salam C.T. Government Primary school charai Beha Matta Swat.....Appellant.

Versues.

1.District Education Officer Male Swat and others.....Respondents.

REJPINDER FROM THE APPELLANT IN RESPECT OF COMMENTS FILED BY THE RESPONDENTS NO.1 TO 3 AND 7 TO. 10.

1. That para,s 1 to 8 need nor for replies.
2. As para,s No, 9 and 10 of the replies are concerned the Rejoinder is this regard is submitted below.

3.The appellant submitted a application dated 28/01/2021 to Manager National Bank Matta for collection of the photo copies of the following cheque and another application submitted to Respodent No,1 for collection of the photo copies of the voucher/ receipts of Rs.5,83,280/- expenditure by Respondent No.7 but in vain.

<u>S.No.</u>	<u>Debit date.</u>	<u>Inst:No.</u>	<u>Amount.</u>
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5.	28/10/2017	304209	1,32,000/-

4.It is submitted to direct the Respondent No.1 to collect the photo copies of the aforementioned cheques from the Manager N.B.P. Matta Swat and the Respondent No.4 submitted the photo copies vouchers/receipts of expenditure Rs.5,83,280/- which is in the custody by Respondent No.1.

5. That it is pertained to be noted that the expenditure record of Respondent No.7 of Rs.5,83,280/- in the custody in the Respondent No.1 office which are Annexure with enquiry report. But the Respondent No. 1 not Annexed the record with his comments.

6. The appellant submitted application dated 19/09/2019 for re enquiry / checking of vouchers/receipts of the appellant expenditure record but in vain. It is pertained to be noted that the Respondent No.4 not checked any record of the appellant.

7. That for the fair justice the above mentioned cheques and vouchers/receipts record as essential.

8. The para,s 11 to 14 need not for replies.

Abdul Salam .....Appellant.

حجاب ڈسٹرکٹ انجکشن آفس (مردانہ) ضلع سوات

درخواست مجرا دعوائی دستاویزات / ووٹرز کے فوٹو  
کا پتیا

حجاب عالی ! مدعی حسب ذیل عرض کرتا ہے۔

1۔ ہم کہ مدعی ڈسٹرکٹ ہائی سکول لیا مٹہ سوات سے نچت  
سی۔ ٹی ڈیوٹی سرانجام دے رہا تھا۔

2۔ ہم کہ مدعی کے ساتھ خلاف ایک غیر قانونی / بے انصافی پر  
بنی انگوائری ہو رہی ہے۔ جس کے بنا پر مدعی کو ملازمت سے  
برخواست کیا گیا ہے۔

3۔ ہم کہ مدعی نے بے انصافی بنی حکم کے خلاف معزز سروس  
سٹریبونل میں سروس اپیل 1719 دائر کیا ہے۔

4۔ ہم کہ انگوائری رپورٹ کے مطابق عنایت الرحمن PS آ

ٹی۔ بی۔ ایس جٹری لیا مٹہ سوات کے 133,000 روپے کے خرچ

کے ہیں۔ اس اخراجات کے دستاویزات / ووٹرز انگوائری رپورٹ  
کے ساتھ منسلک ہیں۔ جو ہم آپ کے دفتر کا صفحہ 2۔ اور معزز  
سٹریبونل کے ریکارڈز میں موجود ہے۔

لینڈ اسٹریٹ 2۔ تم - Right to information Act 2013

Muhammad Ali  
per request submit as  
Court direct  
if really available

جو کہ مدعی کا قانونی حق ہے۔ اس اخراجات کے دستاویزات / ووٹرز  
کے فوٹو کا پتیا میٹا کیا جائے۔

محمد  
عبدالسلام - - - - -  
بذریعہ

محمد حجاب ڈسٹرکٹ ہائی کورٹ پشاور

1/11/2022

بیت حساب ۵۴۵ (M.D. ۱۵۴۵) محلہ برائے وٹا کوئی لکھنؤ

کے متوان: نظر ثانی پسین

کے

حساب عالی

گزارش ہے کہ جو دستاویزی ہوئی ہے۔ علم معینانہ ہوئی ہے  
میں غریب ہوں۔ اور میرا سا تقویٰ پائی رہی ہے۔ میرا بانی  
کرنے دوبارہ دستاویزی فرمائی جائے۔ کاغذات میرا پاس موجود  
جو دستاویزی والے آئے تھے۔ ان سے میرا کاغذات چھوڑ کر رکھے  
میں غریب ہوں دوبارہ دستاویزی کیا ہے

الغرض خالص

عبد السلام C.T  
GHS بنا میں دستاویزی  
etc

D.A.  
Put up on  
File immediately  
19/9/19

Umar Khitab  
ADVOCATE

مرتب حساب ۵۰ (M) D ۵۰ حوالہ سے اور تا کوہ لعل علی

کے متروک: نقل تانی اپیل


۸۰

حساب عالی

مگر درستی ہے۔ کہ جو دستاویز ہیں وہی ہے۔ علم و مہارت سے جو ہے  
میں غریب ہیں۔ اور میں سے گونا گونی ہے۔ میری ہے۔ میری ہے  
کے دوبارہ دستاویز قرار دی جائے۔ کاغذات میں سے جو ہے  
جو دستاویز ہیں وہی ہے۔ میں سے کاغذات جو ہے  
میں سے جو ہیں دوبارہ دستاویز ہیں

العارضہ شامہ

عبد اللہ (C.T.)  
GHS میں سے دستاویز  
۵۰

  
Umar Khitab  
ADVOCATE

D.A.  
Part 40 on  
File immediately  
19/9/15

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHAW PESHAWAR.

Service appeal No.1719/2020.

Abdul Salam C.T. Government Primary school charai Beha Matta Swat.....Appellant.

Versues.

1.District Education Officer Male Swat and others.....Respondents.

REJPINDER FROM THE APPELLANT IN RESPECT OF COMMENTS FILED BY THE RESPONDENTS NO.1 TO 3 AND 7 TO. 10.

1. That para,s 1 to 8 need nor for replies.
2. As para,s No, 9 and 10 of the replies are concerned the Rejoinder is this regard is submitted below.

3.The appellant submitted a application dated 28/01/2021 to Manager National Bank Matta for collection of the photo copies of the following cheque and another application submitted to Respodent No,1 for collection of the photo copies of the voucher/ receipts of Rs.5,83,280/- expenditure by Respondent No.7 but in vain.

<u>S.No.</u>	<u>Debit date.</u>	<u>Inst:No.</u>	<u>Amount.</u>
1.	10/05/2017	304201	18,000/-
2.	17/10/2017	304203	2,00,000/-
3.	23/10/2017	304204	2,00,000/-
4.	26/10/2017	304206	2,00,000/-
5.	28/10/2017	304209	1,32,000/-

4:It is submitted to direct the Respondent No.1 to collect the photo copies of the aforementioned cheques from the Manager N.B.P. Matta Swat and the Respondent.No.4 submitted the photo copies vouchers/receipts of expenditure Rs.5,83,280/- which is in the custody by Respondent No.1.



5. That it is pertained to be noted that the expenditure record of Respondent No.7 of Rs.5,83,280/- in the custody in the Respondent No.1 office which are Annexure with enquiry report. But the Respondent No. 1 not Annexed the record with his comments.

6. The appellant submitted application dated 19/09/2019 for re enquiry / checking of vouchers/receipts of the appellant expenditure record but in vain. It is pertained to be noted that the Respondent No.4 not checked any record of the appellant.

7. That for the fair justice the above mentioned cheques and vouchers/receipts record as essential.

8. The para,s 11 to 14 need not for replies.

Abdul Salam,  Appellant.

حجاب ڈیپارٹمنٹ انجکشن آفس (مردانہ) ضلع سوات

درخواست مجرا دعوائی رسیدات / ووٹرز کے فوٹو  
کا پیمان

حجاب عالی ! مدعی حسب ذیل عرض کرتا ہے۔

1. ہم کہ مدعی ڈیپارٹمنٹ عالی سکول لیا مٹہ سوات میں کچھت  
سی۔ ٹی ڈیپارٹمنٹ میں نام دے رہا تھا۔

2. ہم کہ مدعی کے بعد خلاف ایک غیر قانونی / بے العافی پر  
بنی انگوائری ہو رہا تھا۔ جس کے بنا پر مدعی کو ملازمت سے  
برخواست کیا گیا ہے۔

3. ہم کہ مدعی نے بے العافی بنی حکم کے خلاف معزز سردار  
سُر بیونل میں سرویس اپیل 1719 دائر کیا ہے۔

4. ہم کہ انگوائری رپورٹ کے مطابق عنایت الرحمن PS آ

3-بی۔ ایس چٹری لیا مٹہ سوات نے 6,32,000 روپے کے خرچ

کے ساتھ متعلق ہیں۔ جو ہم آپ کے دفتر کا حصہ ہے۔ اور معزز  
سُر بیونل کے ریکارڈز میں موجود نہیں۔

لینڈ اسٹریٹ 2 - 2013 Right to information Act

Muzaim Ali  
per request submit to  
Court directly if  
kally available

محمد  
بذریعہ

عبد السلام  
محمد حجاب ڈیپارٹمنٹ عالی کورٹ لیا مٹہ

11/11/2022

بیت حساب ۵۰۰ (M) محمد رفیق و تانویہ لعل

کے متوان: نظر ثانی پسند

۳۳

حساب عالی

گزارش ہے۔ کہ جو دستاویزی ہوئی ہے۔ علم معائنہ ہوئی ہے  
میں غریبوں۔ اور سب سے تفریق ہے۔ میرا بی  
کرنے دوبارہ دستاویزی ہوئی جائے۔ کاغذات سب سے ہو  
جو دستاویزی و اس آئے ہے۔ اس سے سب کاغذات حضور (کے) ہے  
میں غریبوں دوبارہ دستاویزی ہے

الغرض شاملہ

عبدالستار C.T  
GHS بیٹا مہم و مسورت  
C.T

D.R.  
put up on  
file immediately.  
19/9/19

Umar Khitab  
ADVOCATE

صاحب حساب ۵۰۰۰۰ (۵۰) چھ ماہ سے اجراء و تادیل کے لیے

کے ۲ مشورے: نظر ثانی کیلئے

صاحب عالی

۲۵

گزارش میں ہے کہ جو دستاویزی میٹریل ہے۔ غیر مستند ہے جو کہ  
میں غریب بیویوں اور مسکینوں کو دیا گیا ہے۔ یہ میٹریل  
کے دوبارہ دستاویزی میٹریل ہے۔ گائڈنس میں  
جو دستاویزی میٹریل ہے۔ اس میں سے گائڈنس کے  
میں غریب بیویوں کو دوبارہ دستاویزی میٹریل ہے

الکازین شہادت

عبد السلام (C.T)  
GHS میں سے میٹریل  
etc

D.A.  
put up on  
file immediately  
for m-9  
19/9/18

Umar Khitab  
ADVOCATE

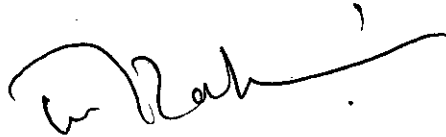
**Appeal No. 1719**

**Reply to, Abdus Salam's appeal**

It is stated that I that I was appointed as PST BPS- 12 in GPS Charai Biha Swat School Code. 21735, on 26-03-2016, at this time Abdus Salam was the head teacher of this School. Before 26-03-2016 Abdus Salam had spent some amount in School and he was responsible of that amount. After this I had spent 632000/- amount in School for boundary wall. The government declared commission for inquiry for School Construction works under the supervision of Principal Hamid Ul Haq Sahib GHSS Kanju Swat. He satisfied from all the constructed works in the School. And after the inquiry he ordered to refund 48720/- to School Account. In NBP Matta Swat.

I had refunded the said amount on 06-12-2019 in the School Account No. 4974-6, NBP Matta Swat.

(Proof attached with this application)



Yours sincerely,

Inayat Ur Rahman

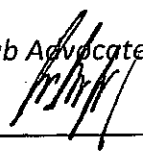
GPS Charai Swat

Dated: 07-04-2021

CHECK LIST

Case title.	Abdul Salam C.T. government High school Beha Matta SwatV/S District Education officer Male Elementary and Secondary Education Swat & Others.		
2.	Case is duly signed.	Yes.	
3.	The law under which the case is preferred has been mentioned.	Yes	
4	Approved file cover is used.	Yes	
5.	Affidavit is duly attested and appended.	yes	
6.	Case and annexures are properly paged and numbered accordance.	Yes	
7.	Copies of Annexures are legible and attested. If not then better copies duly attested have been filed.	Yes.	
8.	Certified copies of all the requisite documents have been filed.	Yes	
9	Certificate specifying that no case on similar grounds was earlier Submitted this court, filed.	yes	
10	Case is within time.	yes	
11	The value for the purpose of court fee and jurisdiction has be		
	Mentioned in the relevant column,		No.
12.	Court fee in shape of stamp paper is affixed		No
13.	Power of attorney is in proper form	Yes	
14	Memo addresses filed.	Yes	
15	List of books mentioned in the petition		No
16	The requisite number of spare copies attached write petition		
	3 No,s civil appeal, ( SB-DB )	Yes	
17	Case Revision /appeal / petition etc, is filed on a prescribed form	yes	

Umar Khitab Advocate.

Signature  dated 5/03/2020

FOR OFFICE USE ONLY.

Case No \_\_\_\_\_

Case Received on \_\_\_\_\_

Complete in all Respect \_\_\_\_\_

Signature \_\_\_\_\_

Date of court. \_\_\_\_\_

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTON KHAWA PESHAWAR

APPEAL NO 1719 /2020

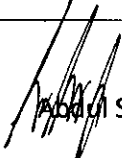
Abdul Salam C.T Government High School Beha Swat .....Appellant.

VESSUES..

1. District Education officer Male Elementary and secondary Education Swat & others.....Respondents.

INDEX

	<u>DESCRIPTION OF DOCUMENTS.</u>	<u>Annexure.</u>	<u>Pages.</u>
1	Memo of appeal.		1-7
2	Affidavit.		8
3	Memo of addresses.		9
4	Promotion to PHST BPS 15.	A	10-14 A
5	Transfer order	B	15
6	Promotion order to C.T. BPS 16	C	16-18
7	Bank statements.	D	19-22
8	False complaint	E	23
9	Nomination of enquiry officer	F	24
10	Vouchers/bills	G	25-44
11	Minutes of parents teachers council	H	45-51
12	Statements of Respondents No 7.8	I/J	52-53
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16	Show cause letter		63
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20	Waklat Name.		72.

  
Abdul Salam Appellant.

Through Umar Khitab Advocate District Courts Swat.

①

BEFORE THE SERVICE TRIBUNAL KHYBER  
PUKHTOON KHAWA PESHAWAR.

Abdul Salam Ex CT Teacher Government High  
School Beha Matta Swat.....Appellant.

Versus.

- 1.The District Education Officer Male Elementary and Secondary Education Swat.
- 2.The Director Elementary and Secondary Education Khyber Pukhtoonkhawa Peshawar.
- 3.The Secretary Elementary and Secondary Education KP Peshawar.
- 4.Mr. Hamdidul Haq Principal Government High School Kanju Swat/ Inquiry Officer.
- 5.Muhammad Gul Headmaster Government High School Parrai Barikot Swat( EX ASDEO Matta circle)
- 6.Mr. Laiqqat Ali PHST Government Primary school Charai Beha Matta Swat.
- 7.Mr. Inatatur Rahman PST Government primary school Charai Beha Matta Swat.
- 8.Mr. Awal Khan chowkidar Government primary school Charai Beha Matta Swat.
- 9.Mr. Shah Dawran PHST Government primary school Mandoor Matta Swat.....Respondents.



2

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL Act, 1974  
AGAINST THE IMPUGNED ORDER NO.5066-72 DATED  
28/11/2019 OF RESPONDENT NO,1 WHEREBY THE  
RESPONDENT NO,1 ILLEGALLY AND WITHOUT FOLLOWING  
SERVICES RULES AND LAWS OF LAND ISSUE THE ORDER  
REMOVAL FROM SERVICE OF THE APPELLANT.

PRAYER IN APPEAL.

On the acceptance of instant appeal the impugned  
order 5066-72 dated 28/11/2019 may kindly be declare null and void i.e  
the Removal from service and appellant may kindly be re instated from  
the date of Removal from service along with back benefits.

RESPECTFULLY SHWETH.

- 1.That the appellant performed his duty as primary  
school teacher with effect from 03/05/1992.
- 2.That the appellant performed his duty as PHST ( Primary  
Head school teacher) at Government primary  
school Charai Beha Matta Swat with effect from  
14/11/2015( order of PHST as Annex: A)
- 3.That the appellant was transferred from Government  
primary school Charai Beha Matta Swat to  
Government primary school Aghal Matta Swat vide  
order No.181-182 dated 30/11/2017.9 Transfer order  
as Annex:B)

4. That the appellant was promoted to C.T ( BPS 15) post at Government High school Beha Matta Swat vide order No.13358 dated 28/2/2019( promotion order as Annex: C)

5. That the Respondent No.1 transfer various amounts to the appellant school( GPS Charai Beha Matta) the detail is listed below. Rs.21,000/- dated 10/2/2014 Rs.21,000/- dated 10/07/2014 Rs.5,62,000/- dated 18/3/2016 Rs.10,000/- dated 31/03/2016 Rs.10,000/ dated 18/03/2016 Rs.6,70,000/- dated 09/01/2017 Rs.1,60,000/- dated 09/01/2017. However the amount mention above was for the purpose of stationary, petty repair and other construction works.( Bank statement as Annex:D)

6. The appellant utilized amount 6,30,730/- under the rules with the consultation of parents teachers council(PTC) and spent the amount on petty repair and on other construction works.

7. That on the complaint of Respondent No.6 the Respondent No.1 appointed Respondent No.4 for the enquiry of allegation mention in the complaint. The enquiry conduct by the enquiry officer is against the law and have not fulfilled the requirements of enquiry. ( Complaint and appointment of enquiry officer are Annex:E/F/)

8. That the Respondent No 6 submitted false complaint against the appellant to High up of department. In fact the appellant having full proof in respect of the works

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in the shape of receipts, vouchers, bills and minutes of the meeting of parents teachers council committee. The whole amount transferred to the Account of GPS Charai Beha Matta Swat was Rs.14.54.000/- in the whole amount the Rs.2,00,000/- were given under the direction of Respondent No. 5 to Respondent No.9 . While the Rs. 6.32.000/- were utilized by the Respondent No.7 while the remaining amount Rs.6,30,730/- were spent under the supervision of appellant. The amount Rs.6,30,730/- were utilize in the shape of petty repair and other construction works( bills, vouchers minutes of PTC committee are available on record.( voucher/bills and minutes are Annex:G/H)

9. The Respondent No.8 cash the amount of Rs.6,32,000/- from NBP Matta and handed over the amount to Respondent No.7 and utilize the amount. The statements of Respondents No.7 and 8 were recorded by the enquiry officer. The statements of both person fully supported the version of appellant. ( statements are Annex:I/J )

10. That the amount Rs.2,00,000/- was for the water supply scheme for GPS Charai Beha Matta Swat. But is pertained to be noted that the concern school did not need the water supply therefore, under the verbal direction of Respondent No.5 the cash amount Rs.2.00.000/ was given to Respondent No.9. But the enquiry officer did not take the statement of Respondent No.5 and 9.

11. The Respondent No.4 /Enquiry officer considered whole amount of both year 2014-15 and 2016-17 Rs.10,32,000/- which is include the amount Rs.5,62,000/- for the year 2014-15 and the amount of Rs.4,70,000/-for the year 2016-17. The above amount was for the construction of boundary wall while from the enquiry officer recommended for the recovery of Rs.99306/- from the appellant. Respondent No.7 received the amount Rs.6,32,000/- for the boundary wall out of Rs.10.32,000/- ( Enquiry Report as Annex:K)

12. That the appellant paid to Respondent No.7 for the boundary wall Rs.4,70,000/- and Rs.1,60,000/- for the group latrin(total Rs.6,32,000/). Therefore, the appellant have no concern with the amount Rs.6,32,000/- According to the statement No.7 is liable for the amount /Recovery.(Recovery letter as Annex:l)

13. That the Respondent No 4 /Enquiry officer stated in para No.8 of his enquiry about the amount Rs.6,32,000/-which is include the amount Rs.1,60,000/- for group literin . The enquiry officer recommended the recovery of Rs.48,720/- from the Respondent No. 7.

14. That the Respondent No, 4 / Enquiry officer stated in para No.9 about group literin of Rs.1,60,000/- and recommended Rs.1,50,000/- from the appellant. However, it is to be noted that group literin amount Rs.1,60,000/- is included in the total amount Rs.6,32,000/- The recovery of Rs.1,50,000/- from the appellant out of Rs.6,32,000/- is unjustified.

15. That the para No.10 of the Respondent No,4/ Enquiry officer is against the facts and laws. Because ASDEO(P&D) had no given to the appellant the amount Rs.2,00,000/- It is pertained to mention here the amount for water supply was given to Respondent No.9 on the verbal direction of Respondent No.5 by the appellant.

16. The Respondent No.1 issue the illegal order Removal from service of the appellant on the basis of un lawful enquiry conducted by the Respondent No.4. (impugned order as Annex: M )

17. The major punishment ( Removal from service) awarded by Respondent No,1 to the appellant is against the service laws and rules.

18. The appellant had already challenge the final order of the enquiry report in this Honorable Tribunal.

GROUND FOR APPEAL.

1. That the order of Respondent No,1 No,5066-72 dated 28/11/2019 is against the law and services laws.

2. That in the whole process the appellant remained condemned un heard.

3. That the appellant Departmental appeal have already submitted to Respondent No,2 vide post office receipt No,518 dated 03/12/2019. Annex: N )

7  
4. That the calculation of Respondent No,4 is incorrect.

5. That the impugned order is against the law, rules and violation of fundamental law of land.

6. The appellant submitted the show cause reply to Respondent No. 1 vide Dairy No. 2655 dated 28/10/2019.( Annex:O)

On acceptance of instant appeal the impugned order No, 5066-72 dated 28/11/2019 may kindly be declare null a void and set side (the Removal from service) and appellant may kindly be re instated from the date Removal from service along with back benefits.

Abdul Salam.....Appellant

CERTIFICATE.

It is certified that no such like appeal has earlier been filed by the appellant nor is pending or decided by this Honorable Tribunal.

Abdul Salam.....Appellant.

*[Handwritten signature]*

8

BEFORE THE SERVICE TRIBUNAL KHYBER PULHTOONKHAWA PESHAWAR.

Service appeal No \_\_\_\_\_

Mr. Abdul Salam C.T. Government High School Beha Matta Swat..... Appellant.

Versus.

1. District Education Officer ( Male) Saidu Sharif Swat & Others ...Respondents.

AFFADAVIT.

It is stated on oath that all the contents of this service appeal  
Are true and correct to the best knowledge and belief. Moreover, no such  
Like service appeal is pending before this Honorable Tribunal.

Deponent. \_\_\_\_\_

Abdul Salam 

Government High School Beha Matta Swat,

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**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHW PESHAWAR.**

SERVICE APPEAL NO \_\_\_\_\_/2019.

Abdul Salam C.T. Government High School Beha Matta Swat.....Appellant.

Versus.

1. Government Khyber Pukhtoonkhw Through Secretary Elementary and Secondary Education Peshawar & other..... Respondents.

**MEMO OF ADDRESSES.**

**Address of Appellant.**

Abdul Salam C.T. Government High School Beha Matta Swat.


CNIC 15601 3966728-1

Cell No. 0343 2451522

**Addresses of Respondents.**

1. The District Education Officer( Male) gulkada saidu sharif Swat.
2. The Director Elementary and Secondary Education Khyber Pukhtoonkhw G.T. Road Peshawar.
3. Government of Khyber Pukhtoonkhw Through Secretary Elementary and Secondary Education Peshawar.
4. Mr. Hamidul Haq Principal Govt: High school Kanju Swat/ Enquiry officer.
5. Mr. Muhammad Gul Headmaster G.H.S. Parrai Barikot Swat( Ex A.S.D.E.O. Matta circle)
6. Mr. Laiqat Ali P.H.S.T. G.P.S. Charai Beha Matta Swat.
7. Mr. Inayatur Rahman P.S.T. G.P.S. Charai Beha Matta Swat.
8. Mr. Awal Khan chowkidar G.P.S. Charai Beha Matta Swat.
9. Mr. Shah Dawran P.S.T. G.P.S. Mandoor Matta Swat.

Appellant  
Through

  
Umar Khitab  
Advocate

District Courts Gul Kada Saidu Sharif Swat.  
Cell No. 0345 9377656