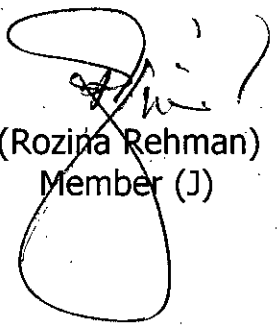


25.03.2021

Nemo for appellant.

Case was called time and again but neither appellant nor his counsel turned up. Consequently, instant appeal is dismissed in default for non-prosecution. No order as to costs. File be consigned to the record room.

Announced.  
25.03.2021

  
(Rozina Rehman)  
Member (J)

27.04.2020 Due to COVID-19, the case is adjourned to 03.08.2020 for the same, before S.B.

03.08.2020 None for the appellant is present at the moment i.e 2:10 P.M. On last date, case was adjourned due to spread of COVID-19 Pandemic, therefore, appellant as well as his counsel be issued notices for 22.10.2020. File to come up for preliminary hearing before S.B.

(MUHAMMAD JAMAL KHAN)  
MEMBER

22.10.2020 Appellant is present in person.

Since the Members of the High Court as well as of the District Bar Association Peshawar are observing strike today, therefore, the case is adjourned to 30.12.2020 on which date to come up for preliminary hearing before S.B.

(Muhammad Jamal Khan)  
Member (Judicial)

30.12.2020 Appellant in person present.

Appellant seeks adjournment as his counsel is not available today.

Adjourned to 25.03.2021 for preliminary hearing before S.B.

(Mian Muhammad)  
Member(E)

17.12.2019

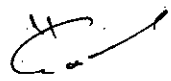
Appellant in person.

Requests for adjournment due to general strike of the Bar. Adjourned to 28.01.2020 before S.B.

  
Chairman


28.01.2020

Appellant in person present and seeks adjournment as his counsel is not in attendance. Adjourn. To come up for preliminary hearing on 16.03.2020 before S.B.

  
Member

16.03.2020

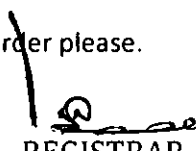



Appellant in person present and seeks adjournment as lawyers community is on strike on the call of Peshawar Bar Association. Adjourn. To come up for preliminary hearing on 27.04.2020 before S.B.

  
Member



Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_  
Case No.- 953/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/07/2019	<p>The appeal of Mr. Muhammad Zaman presented today by Mr. Siraj Muhammad Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 24/7/19</p>
2-	20/08/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/09/19.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	27.09.2019	<p>Mr. Mir Zaman Safi, Advocate for learned counsel for the appellant present.</p> <p>Requests for adjournment due to non-availability of learned counsel.</p> <p>Adjourned to 15.11.2019 before S.B.</p> <p style="text-align: right;"> Chairman</p>
	15.11.2019	<p>Appellant present.</p> <p>The Worthy Chairman is on leave, therefore, the matter is adjourned to 17.12.2019 for the same.</p> <p style="text-align: right;"> Reader</p>

25

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. 953 /2019

Muhammad Zaman.....Appellant


**V E R S U S**

D.E.O (Male), District Swabi and others.....Respondents

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		5-6
3.	Addresses of Parties		7
4.	Copy of order dated 17.04.2009	A	8-14
5.	Copy of order dated 09.03.2019	B	15
6.	Copy of departmental representation/ appeal	C	16-17
7.	Wakalat Nama		18

Through Appellant

  
**Siraj Muhammad**  
Advocate, Peshawar  
Cell: 0346-9354514

Date: 24 / 7 /2019

①

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. 953 /2019

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1033

Dated 24/7/19

Muhammad Zaman,  
S/o Sher Hasan  
R/o Marghuz, Tehsil and District, Swabi.....**Appellant**

**V E R S U S**

1. District Education Officer (Male),  
District Swabi
2. Secretary Education,  
Govt of KPK  
Civil Secretariat, Peshawar
3. Director Education, KPK,  
G.T.Road, Peshawar
4. Sub-Divisional Education Officer (Male),  
District Swabi.....**Respondents**

Appeal u/s 4 of the Khyber  
Pakhtunkhwa Service Tribunal Act,  
1974 against the order dated  
09.03.2019 of respondent No.1,  
whereby appellant has been  
terminated from service.

Filed to-day

Registrar

24/7/19

**Respectfully Sheweth:**

The appellant submits as under:

1. That the appellant was appointed as Chowkidar Class-IV under 25% Quota reserved for Retired Class-IV sons/ daughters in Education Department on the recommendation of the District Selection Committee vide order dated 17.04.2009. (Copy of order dated 17.04.2009 is Annexure "A").
2. That on 09.03.2019, the respondent No.1 vide order dated 09.03.2019, on the pretext of false allegations, terminated the appellant from service. (Copy of order dated 09.03.2019 is Annexure "B").
3. That after termination from service, the appellant the appellant approached the respondent No.3 and preferred a representation/ appeal, which is still not entertained by the respondent No.3. (Copy of departmental representation/ appeal is Annexure "C").
4. That the respondent No.3 failed to adjudicate upon the representation/ appeal of the appellant. As such the appellant approaches this Honourable Tribunal for the redressal of his grievances, on the following amongst other grounds:

**GROUND S:**

- A. That the impugned termination order of appellant dated 09.03.2019, is against the law and facts on record, hence liable to be set aside.

- B. That the appellant's services have been terminated on disregard of the procedure prescribed in Khyber Pakhtunkhwa Govt Servants (Efficiency & Discipline), Rules, 1973. The impugned order is therefore, perverse in the eyes of law.
- C. That the Supreme Court of Pakistan in a number of judgments has held that in case of any irregularity on the part of government in selection/ recruitment process, the selected government/ civil cannot be made a scape goat for the lapse of the government.
- D. That appellant was fully qualified at the time of appointment and over a period of time he accrued vested rights to the said post. The respondents are estopped at this belated stage to take the said adverse action of termination keeping in view the principles of locus poenitentiae.
- E. That the petitioner has become over-aged for any other government employment, thus, is indeed height of authoritarian.
- F. That the allegations as set-forth against the appellant is unilateral in nature, based on hearsay and does not disclose any specific attribution towards the appellant.



- G. That the appellant is job knowing and law-abiding citizen and performed his duties with full devotion and having unblemished service record.
- H. That there is no criminal material is available against the appellant, which could suggest any negation or violation of Rules or Code of Conduct by awarding such major penalty i.e. termination from service.
- I. That no proper inquiry has been made to probe the so-called allegation made against the appellant, and he has been condemned unheard which is against the principle of natural justice.
- J. That the inquiry officer, if any, neither provided any piece of evidence to associate the appellant with so-called baseless allegations by the respondents/ department, rather all the process has been completed at the back of appellant without any physical visit and his stance.
- K. That the appellant is sole bread earner of his entire family and having no source of income except the present service.
- 5. That the appellant seeks leave of this Honourable Tribunal to raise further points at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant service appeal, the impugned termination order dated 09.03.2019 may very graciously be declared illegal and void ab-initio and the same be struck down and he may please be restored in his service with all back benefits and consequential reliefs.

Any other remedy which is deemed fit by this Honourable Tribunal in the interest of justice, may also be granted in favour of appellant.

Through Appellant



**Siraj Muhammad**  
Advocate High Court

Date: 24/7/2019

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2019

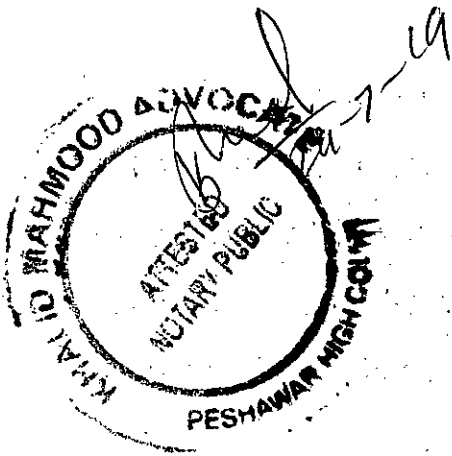
Muhammad Zaman.....**Appellant**

**VERSUS**

D.E.O (Male), District Swabi and others.....**Respondents**

**AFFIDAVIT**

I, Muhammad Zaman S/o Sher Hasan R/o Marghuz, Tehsil and District, Swabi, do hereby solemnly affirm and declare that the contents of accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



*Umar*  
**DEPONENT**  
CNIC: 16202-7290658-9  
Cell: 0343-9210173

*[Faint signature]*  
[Faint text]

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2019

Muhammad Zaman.....Appellant

**V E R S U S**

D.E.O (Male), District Swabi and others.....Respondents

**ADDRESSES OF PARTIES**

**APPELLANT**

Muhammad Zaman,  
S/o Sher Hasan  
R/o Marghuz, Tehsil and District, Swabi

**RESPONDENTS**

1. District Education Officer (Male),  
District Swabi
2. Secretary Education,  
Govt of KPK  
Civil Secretariat, Peshawar
3. Director Education, KPK,  
G.T.Road, Peshawar
4. Sub-Divisional Education Officer (Male),  
District Swabi

Through

Appellant



**Siraj Muhammad**  
Advocate High Court

Date: 24/2/2019

**APPOINTMENT OF CLASS-IV SERVANTS**

Consequent upon the recommendation of the Departmental Selection Committee as contained in the minutes of the meeting held on 17.04.2009.

The EDO Elementary & Secondary Education Swabi is pleased to order the appointment of the following candidates against Class IV posts in BPS No.1 (Rs.2970-90-5670) plus usual allowances as admissible under the rules and posted against the vacant posts at the stations noted against their names from the date of their taking over charge and will be governed under civil servants Act 1973, amended NWFP act 2005 except pension/gratuity in the interest of public service on the terms and conditions given below:-

**CANDIDATES APPOINTED UNDER DECEASED 100% QUOTA**

S#	Name	Father's Name	Death date of Deceased	Address	Posted As	PF	Name of School	Remarks
1	Zahir Gul	Inzar Gul	12.09.95	VPO, Pabaini	Chowkidar	35	GPS Said Shah Garhi(Pabaini)	AVP
2	Ayaz Ali	Said Mahmood	08.02.97	VPO, Fazal Abad Gohati	Chowkidar	34	GGPS Sardar Abad	AVP
3	Mahab Ali	Nawab Ali	07.10.03	VPO, Permooli	N/Qasid	35	GGHS Dobian	AVP
4	Mujahid	Zarin Dad	11.08.05	VPO, Yar Hussain	Sweeper	34	GHS Jehangira	AVP
5	Waqar	Amir Muhammad	13.10.08	VPO, Manki	Chowkidar	36	GHS Manki	AVP
6	Kacbil Ali	Abdul Ghani	29.03.09	VPO: Said Abad Gohati	Chowkidar	31	GGPS Said abad Gohati	AVP

**CANDIDATES APPOINTED UNDER 25% QUOTA RESERVED FOR RETIRED CLASS-IV SONS, DAUGHTERS**

S#	Name of Candidates	Father's Name	D/O of Retirement	Home Address	Posted as	PF	Name of school where appointed	Remarks
1	Gohar Rahiman	Sarab Gul	31.12.83	Tordher, Lahor, Swabi	Chowkidar	34	GGPS No.5 Tordher	AVP
2	Baryal	Tah Ghah	01.10.87	Kamal Khel Panj Pir, Swabi	Caller	31	GGCMS Panj Pir	AVP
3	Murad	Fard Khan	31.09.93	Mili Khel Gandaf (G) Swabi	Chowkidar	30	GGPS No.1 Gandaf	AVP
4	Muhammad Zaman	Sher Hassan	15.02.97	Qamarul Marghuz, Swabi	Chowkidar	35	GGCMS No.3 Marghuz	AVP
5	Muhammad Irshad	Azeem Ullah	31.12.97	Bara Cham Darra, Swabi	N/Qasid	31	GGCMS Hamza Dher	AVP
6	Inayat ur Rahman	Waheed Ullah	21.05.00	Shabi Khel Adda Gandaf (G) Swabi	Chowkidar	36	GPS Dhero Gandaf	AVP
7	Sher Zamin Khan	Shafiq Rahman	20.06.00	New Cham Zaida	Sweeper	35	GGMS Panjman	AVP
8	Rafiqat Ullah Khan	Said Bahader	18.10.01	Bazid Khel Besak (G) Swabi	Chowkidar	36	GPS Besak	AVP
9	Zahir Ali Shah	Niazat Ullah	31.10.01	Dewan Khel Kalabat	Chowkidar	35	GPS No.1 Kalabat	AVP
10	Isteraf	Faqir Taj	24.01.02	Kaju Khan, Swabi	Chowkidar	33	GHS Kaju Khan	AVP
11	Mubarik Shah	Mahmood Shah	08.10.02	Maka Khel Zaida, Swabi	L/Attend	35	GGHS Bamkhel	AVP
12	Sabir Ali Khan	Mazroof Khan	01.11.02	VPO Meher Ali Mutazam Koly	Chowkidar	32	GPS Sher Darra	AVP
13	Javed Iqbal	Said Ghafoor Shah	31.12.02	Mangi, Swabi	Chowkidar	32	GPS No.1 Dagi	AVP
14	Fazal Ghani	Faqir Ullah	15.09.03	Awan Jalbar	Chowkidar	34	GPS No.1 Manki	AVP
15	Adil Nawaz	Nawar Khan	01.04.04	Khumar Khel K.S.K	Chowkidar	32	GPS Asola Sharif	AVP
16	Sher Zamin Khan	Sher wali Khan	12.04.04	Miangjan Panj Pir Swabi	Chowkidar	31	GGPS No.2 Kala	AVP
17	Usman Khan	Abdul Kamil	01.01.05	Shera Ghund Swabi	Chowkidar	33	GGPS Centre Saproona	AVP
18	Alan Zaib	Ghulam Akbar	11.01.05	Bar Cham Kalabat	Chowkidar	35	GPS No.3 Kalabat	AVP
19	Laig Zada	Sahib Zada	02.02.05	Ghazi kot Y/Hussain	Chowkidar	33	GPS Qasim Banda	AVP
20	Muhammad Fayaz	Sultan Hussain	12.02.05	Dawat Khel Adina Swabi	N/Qasid	33	GGCMS Adina	AVP
21	Amjad Ali	Zamir Gul	30.06.05	Habib Abad Sudher, Swabi	Sweeper	33	GHS Adina	AVP
22	Taj Akbar	Yaqoob Khan	25.08.05	Sher Dad khel Swabi	Chowkidar	31	GHSS Mansabdar	AVP
23	Said Zahir Shah	Said Bakhat Shah	24.09.05	Naiko Khel Sheikh Jana, Swabi	Chowkidar	32	GGPS Permooli	AVP
24	Fazal Amin	Rahim Shah	31.10.05	Hadi Mera Salim Khan, Swabi	N/Qasid	34	GGHS Manki	AVP
25	Qasim Ali Shah	Faqir Said	14.12.05	Multani Gabasni, (G) Swabi	Chowkidar	36	GGPS Gabasni (G)	AVP
26	Waqar Ahmad	Habib ur Rahman	16.12.05	Babi Khel Trulandi, Swabi	N/Qasid	32	GGCMS Shewa	AVP

M/S/11 9/9/09

**Attested**

27	Rashid Khan	Pir Said Shamsahad Khan	09.07.06	Ulla Gaddan Aka Khel Gar Munara, Swabi	Chowkidar	36	GHS Ulla (G)	AVP
28	Bakhtiar Khan	Ghulam Haider	02.04.06	Lazak Thandkoi, Swabi	Chowkidar	35	GPS Gar Munara GGPS-1 Shahmansoor	AVP
29	Amjad	Ghani Akbar	01.07.06	Manki Swabi	Chowkidar	31	GPS Sherdin Banda	AVP
30	Anwar Zarb	Suleman	01.07.06	Lahor (East)	Chowkidar	34	GPS No.2 Manki	AVP
31	Ghaniur Rahman	Salim Dad	20.07.06	Sakhar Dado Uta (G) Swabi	Sweeper	34	GHS Beki	AVP
32	Gul Nawaz Khan	Shah Jbhan	27.07.06	Satkithar (G) Swabi	Chowkidar	36	GPS Sakar Ulla (G)	AVP
33	Sher Ghazan	Hazrat Umer	03.10.06	Amakhel Maneri Payan, Swabi	Chowkidar	36	GPS Satkethar (G)	AVP
34	Taj Nabi Khan	Masal Khan	12.10.06	Esa Khel Sokilai (G) Swabi	Chowkidar	31	GGPS-3 Maneri Bala	AVP
35	Subhan Ullah	Sarfaraz Khan	12.10.06	Saheer Dad Khel Swabi	Chowkidar	36	GGPS Galla (G)	AVP
36	Qut Zamin	Jamil Khan	16.10.06	Said Khan Naranji, Swabi	Chowkidar	31	GPS-2 Swabi	AVP
37	Farhad Ali	Fazal Hakeem	22.10.06	Baloo, Lahor, Swabi	Chowkidar	32	GPS No 2 Sheikh Jana	AVP
38	Fulad Hakeem	Khan Wali	27.10.06	Ganichitra (G) Swabi	Chowkidar	34	GGPS-2 Anbar	AVP
39	Said Wali	Fazal Shah	30.10.06	Ayub Khel, Lahor	Chowkidar	36	GHS Ganichitra (G)	AVP
40	Sarfaraz Khan	Sahib Zar	01.12.06	Tano Lahor	Chowkidar	34	GPS Dhoba Lahor	AVP
41	Mutabar Khan	Izzatur Rahman	31.12.06	Miangon Lahor, Swabi	Chowkidar	34	GPS-2 Tano	AVP
42	Zahir ur Rahman	Hidayat Shah	31.12.06	Aka Khel Gabasni (G) Swabi	Chowkidar	36	GGMS Kabqani	AVP
43	Iftikhar Ali Shah	Jamil Ahmad	31.12.06	Amir Ahmad Khel Salim Khan, Swabi	Sweeper	31	GHS-1 Salim Khan	AVP
44	Shakcel Ahmad	Gulrooz Khan	31.12.06	Miangon Sudher, Swabi	Chowkidar	33	GHS Dobian	AVP
45	Faid Ali	Muhammad Sherin	01.01.07	Mahmoodyan, Jalbal, Swabi	Chowkidar	34	GHS Jalbal	AVP
46	Muhammad Sadiq	Faqir Muhammad	03.01.07	Aman Kot	N/Qasid	32	GMS Aman Kot	AVP
47	Sadbarq Ali Iqbal	Mirawos Khan	18.03.07	Khan Pur Abad Baja, Swabi	Chowkidar	36	GGPS-1 Baja	AVP
48	Muhammad	Amir Sher	01.04.07	Shaga Wand Panj Pir, Swabi	Chowkidar	31	GGCMS Panj Pir	AVP
49	Azeem Hafeez	Sikandar Ali	17.04.07	Tano Lahor	Chowkidar	34	GPS-3 Manki	AVP
50	Nehar Ali	Rehan Gul	31.05.07	Shagai Ambar, Lahor, Swabi	Chowkidar	34	GGPS-1 Anbar	AVP
51	Gul Nawaz Khan	Shah Afzal	13.08.07	Khel Sard	Chowkidar	33	GHS Adina	AVP
52	Abdullah Khan	Taj Malook	14.08.07	Khel Zarobi	Chow	35	GPS-1 Zarobi	AVP
53	Saeed Akhtar	Said Akbar Khan	01.09.07	Bam Khel Swabi	Chowkidar	35	GHSS Bamkhel	AVP
54	Zied Muhammad	Faqir Muhammad	15.09.07	Mansoor Mansi Zaida	Chowkidar	35	GPS Irfan Abad Kanbat	AVP
55	Special Khan	Zahir Islam	15.09.07	Arakhi Traki Swabi	Chowkidar	32	GHS Dagi	AVP
56	Farooq Ali	Khan Ghali	17.11.07	Said Khan Naranji, Swabi	L/Attend	32	GHS Naranji	AVP
57	Muhammad Zarish	Zahir Jang	11.12.07	Rana Garhi Lahor, Swabi	Chowkidar	34	GPS Rana Garhi	AVP
58	Zahwa Khan	Mansoor Khan Noor	01.01.08	Kulu Khan, Swabi	Chowkidar	33	GPS Khoro Kotar	AVP
59	Niaz Muhammad	Muhammad	01.01.08	Mira Dhok Lahor, Swabi	Chowkidar	34	GPS Umer Dook Lahor	AVP
60	Kiranat Ullah	Banaras Khan	01.01.08	Thana Cham Lahor	Chowkidar	34	GPS Haryan	AVP
61	Rashid Ali	Sawar Khan	01.01.08	Major Banda Salim Khan	Chowkidar	34	GPS Manki	AVP
62	Asad Khan	Muhammad Sher	01.01.08	Ali Zai Batakara	N/Qasid	34	GHS Manki	AVP
63	Waheed Murad	Fazal Muhammad	31.05.08		Chowkidar	36	GGHSS Topi	AVP

**CANDIDATES APPOINTMENT UNDER 2% QUOTA RESERVED FOR DISABLED PERSONS**

S#	Name	Father's Name	Address	Posted As	PF	Name of School	Remarks
1	Noor Zamin Khan	Amir Khan	VPO, Maneri Payan	Chowkidar	31	GHS Maneri Bala	AVP
2	Liagat Ali	Mirawos	VPO, Permooli	L/Attend	32	GHS Permooli	AVP
3	Mian Fakhrul Wahab	Mian Noorul Wahab	VPO, Sudher	Chowkidar	33	GGPS Sudher	AVP
4	Ishliq Ahmad	Amir Nawaz Khan	VPO, Bara Khani Lahor	Chowkidar	34	GGHSS Lahor (W)	AVP
5	Said Muhammad	Shamsul Qamar	VPO, Gandaf	Chowkidar	36	GPS No 2 Dheroi Gandaf	AVP

M. N. Khan 9/9/09

**Attested**

GENERAL CANDIDATES

PF-31

S#	Name	Father's Name	Address	Posted As	Name of School	Remarks
1	Usman Gul	Rahman Gul	VPO,Shahmansoor	L/Attend	GHS Shhamansoor	AVP
2	Gohar Ali Khan	Hashim Ali Khan	VPO,Shhamansoor	Chowkidar	GPS No.1 Jangidher Shahmansoor	AVP
3	Gul Said	Yar Muhammad	VPO,Shahmansoor	Chowkidar	GGHS Shahmansoor	AVP
4	Syed Ayub Shah	Syed Khaqan	VPO,Panj Pir	Chowkidar	GGPS No.1 Panj Pir	AVP
5	Foziat	D/O Abdul Khaliq	VPO,Panj Pir	Sweepress	GGHS Panj Pir	AVP
6	Naik Muhammad	Fateh Muhammad	VPO, Swabi	Chowkidar	GHS Swabi	AVP
7	Ghufran Ullah	Raza Khan	VPO,Sikandari	Chowkidar	GHS Sikandari	AVP
8	Gohar Ali	Abdul Samad	VPO,Mian Dheri	Chowkidar	GPS No.2 Mian Dheri	AVP
9	Zakia Bibi	D/O Amir Zada	VPO,Saidu Dher	Caller	GGCMS Saidu Dher	AVP
10	Yousaf Zada	Wazir Zada	VPO,Saidu Dher	N/Qasid	GGCMS Saidu Dher	AVP
11	Amjad Ali	Hazrat Umar	VPO,Mansabdar	Chowkidar	GHSS Mansabdar	AVP
12	Wahid Ullah	Qazi Zakir Ullah	VPO,Firdos Abad	Chowkidar	GGPS Firdos Abad	AVP
13	Alam Zeb	Mamraiz Khan	VPO,Maneri Bala	Sweeper	GMS Shagai Maneri Bala	AVP
14	Gulzar Khan	Sher Wali	VPO, Maneri Bala	N/Qasid	GPS Shagai-1 Maneri Bala	AVP
15	Sher Tasir	Mudassir Khan	VPO,Maneri Bala	Chowkidar	GHS No.1 Salim Khan	AVP
16	Zar Waiz Khan	Khan Sher	VPO,Salim Khan	Bchishli	GPS Bezad Khel'S.Khan	AVP
17	Akhtar Munir	Alam Sher	VPO, Salim Khan	Chowkidar	GPS Bezad Khel'S.Khan	AVP
18	Meraja	W/O Fazal Subhan	VPO, Gar Panj Pir	Sweepress	GGMS Gar Panj Pir	AVP
19	Zahir Rahman	Banaras Khan	VPO,Gar Panj Pir	N/Qasid	GGMS Gar Panj Pir	AVP
20	Gohar Ali	Mir Bacha	VPO,Maneri Bala	Chowkidar	GGPS Pirtab Banda Maneri	AVP
21	Faheem ur Rabbi	Zar Nabi Khan	VPO,Mir Said Koroona M/Bala	Chowkidar	GPS Mir Said Koroona	AVP
22	Nawab Ali	Muhammad Bahader	VPO, Khoro Kala	N/Qasid	GMS Kala	AVP
23	Gul Suma Bibi	W/O Lal Wahab	VPO,Hamza Dher K.S.K	Caller	GGCMS Hamza Dher	AVP
24	Rajwali Khan	Sher Ali Khan	VPO,Shagai Maneri Balal	Chowkidar	GPS Naeem Shah Koroona Swabi	AVP
25	Jehangir Khan	Jamsher Khan	VPO,Salim Khan	Chowkidar	GPS Major Banda	AVP
26	Sher Badshah	Gul Badshah	VPO,Mian Killi	Chowkidar	GPS Baker (S.Khan)	AVP
27	Ata-ur-Rahman	Tajbar Khan	VPO, Maneri Payan	Chowkidar	EDO(E&S) Edu.Office	AVP
28	Jabar Khan	Basharat Ali	VPO, Basharat Abad	Chowkidar	GGPS Basharat Abad	AVP

PF-32

29	Muhammad Sadiq	Muhammad Raziq	VPO,Sheikh Jana	N/Qasid	GHS Sheikh Jana	AVP
30	Jamil Khan	Muhammad Jamal Khan	VPO,Asota Sharif	L/Attend	Asota Sharif	AVP
31	Noor Jehan	W/O Sardar Muhammad	VPO,K.S.K	Caller	MS Shewa	AVP
32	Muhammad Zahid	Said Majeed	VPO, Shewa	Chowkidar	GGPS No.1 Shewa	AVP
33	Gulzar Muhammad	Mir Muhammad	VPO,Shewa	Chowkidar	GPS Tuheed Abad Shewa	AVP
34	Ramzan Bibi	W/O Tajwal Khan	VPO,Permolli	Caller	GGCMS Permolli	AVP
35	Akbar Hussain	Gohar Khan	VPO,Permolli	N/Qasid	GGCMS Permolli	AVP
36	Hayat Khan	Hakim Khan	VPO, Spin Kan	Chowkidar	GHS Sheikh Jana	AVP
37	Samin	W/O Zahid	VPO,Narahji-	Sweepress	GGMS Naranji	AVP
38	Naz Wali Khan	Shawar Khan	VPO,Naranji	N/Qasid	GGMS Naranji	AVP
39	Zar Jamal	Umer Shah	VPO, Naranji	Chowkidar	GPS Naranji Qamar Dhand Haji abad	AVP
40	Siyar Said	Nawab Zada	VPO, Ghulaman	Chowkidar	GGPS No.2 Ghulaman	AVP
41	Sher Ali Khan	Manzoor Ali	VPO, W.Muhd Kote Taraki	Chowkidar	GGPS Wali Muhammad Kote Tarakai	AVP
42	Zafar Ali	Taj Muhammad	VPO,Turlandi	Chowkidar	GPS Shagai Turlandi	AVP
43	Muhammad Zahid	Muhammad Yaqoob	VPO, Turlandi	L/Attend	GGHS Turlandi	AVP
44	Bakhat Munir	Samar Qand	VPO, Dagi	N/Qasid	GGMS Shamroz Abad Dagi	AVP
45	Nihara	W/O Ifekhar	VPO, Dagi	Sweepress	GGMS Shamroz Abad Dagi	AVP
46	Sadiqur Rahman	Gharib Shah	VPO, Dagi	Chowkidar	GGPS Shamroz Abad Dagi	AVP
47	Qaiser Khan	Azad Khan	VPO, Dagi	N/Qasid	GHS Dagi	AVP
48	Zaki Ali	Shakir Ullah	VPO, K.S.K	N/Qasid	GGMS Roshan Pura	AVP

M. A. Khan 9/9/09

Attested

49	Umraz	W/O Fazli Raziq	VPO, Roshan Pura KSK	Sweepress	GGMS Roshan Pura	AVP
50	Farhad Ali	Gul Shad	VPO, K.S.K	N/Qasid	GMS K.S.K	AVP
51	Altat Hussain	Zar Muhammad	VPO, K.S.K	Sweeper	GMS K.S.K	AVP
52	Ayaz Khan	Muhammad Iqbal	VPO, K.S.K	Chowkidar	GHS K.S.K	AVP
53	Hazrat Jamal	Fazal Khaliq	VPO, K.S.K	Chowkidar	GGHS K.S.K	AVP
54	Nawab Ali	Zulqadar	VPO, K.S.K	Chowkidar	GGPS No.1 K.S.K	AVP
55	Shahab Hassan	Noor Hassan	VPO, K.S.K	Chowkidar	GGPS Jamal Abad KSK	AVP
56	Farzand Ali	Khan Bahader	VPO, K.S.K	Chowkidar	GPS No.2 K.S.K	AVP
57	Syed Shah Zaib	Mukamil Shah	VPO, Ghulaman	Chowkidar	GGPS Ghulaman	AVP
58	Farooq Hussain	Rajab Khan	VPO, K.S.K	Chowkidar	GGPS Qadamay Tarakai	AVP
59	Anwar Rashid	Abdur Rashid	VPO, K.S.K	N/Qasid	CMPS Roshan Pura KSK	AVP
60	Manzoor Ali	Zahirullah	VPO, K.S.K	Chowkidar	GGHS Turlandi	AVP
PF-33						
61	Inayat Rahman	Shah Multan	VPO, Yar Hussain	N/Qasid	GHS No.2 Yar Hussain	AVP
62	Shah Faisal	Rehan Gul	VPO, Yar Hussain	L/Attend	GHS No.1 Y/Hussain	AVP
63	Rukhan	Abdur Rahman	VPO, Yar Hussain	Chowkidar	GGHS Y/Hussain	AVP
64	Alam Sher	Bahader sher	VPO, Sudher	N/Qasid	GGMS Sudher	AVP
65	Falak Naz	Itabar Khan	VPO, Sudher	Sweepress	GGMS Sudher	AVP
66	Hidayat Ullah	Inayat Ullah	VPO, Adina	N/Qasid	GGCMS Adina	AVP
67	Nadra	D/O Siraj Gul	VPO, Adina	N/Qasid	GGHS Adina	AVP
68	Farooq Zaman	Mahmood Shah	VPO, Ismailia	Chowkidar	GHSS Ismailia	AVP
69	Shad Ali Khan	Fazal Ghani	VPO, Yar Hussain	Chowkidar	GPS Bakayana (Yaqoobi)	AVP
70	Ashfaq Ali	Chani Ullah	VPO, Kalu Khan	Sweeper	GMS Kalu Khan	AVP
71	Tahir	Fazli Karim	VPO, Daulat	Chowkidar	GPS Daulat	AVP
72	Ikram Shah	Musharaf Shah	VPO, Dobian	Mali	GHS Dobian	AVP
73	Mian Rahid Akbar	Mian Muhammad Yusaf	VPO, Dobian	Chowkidar	GGHS Dobian	AVP
74	Amjad Ali	Mira Khan	VPO, Adina	Chowkidar	GPS No.2 Adina	AVP
75	Asad Ali	Wisal Muhammad	VPO, Sher Ghund	N/Qasid	GHS Sher Ghund	AVP
76	Farhad Ali	Fazal Rahim	VPO, Bazargi	Chowkidar	GPS Fazli Rahim Killi Bazargi	AVP
77	Fazal Hussain	Ghulam Hussain	VPO, Shera Ghund	Chowkidar	GHS Shera Gund	AVP
PF-34						
78	Zuhaib Hassan	Kamdar	VPO, Tordher	N/Qasid	GGMS Tordher	AVP
79	Salma	Muhammad Hashim	VPO, Tordher	Sweepress	GGMS Tordher	AVP
80	Zar Muhammad Khan	Gul Muhammad	VPO, Bazar Tordher	N/Qasid	GGMS Bazar	AVP
81	Ramim	D/O Sher Khan	VPO, Bazar Tordher	Sweepress	GGMS Bazar	AVP
82	Mir Wali Khan	Muhammad Ali Khan	VPO, Tordher	N/Qasid	GMS No.2 Tordher	AVP
83	Fazal Wahab Muhammad Inayat	Muhammad Ali Khan	VPO, Tordher	Sweeper	GMS No.2 Tordher	AVP
84	Inayat	Aman Khan	VPO, Tordher	N/Qasid	GHS Tordher	AVP
85	Abdullah Khan	Muhammad Younas	VPO, Tordher	Chowkidar	GGHS Matani Changan Tordher	AVP
86	Jannat Gul	Sanab Gul	VPO, Tordher	Chowkidar	GPS No.2 Tordher	AVP
87	Ubaid Ullah	Tajbar Ullah	VPO, Tordher	Chowkidar	GPS Gul Dher Matani, Changan Tordher	AVP
88	Bismillah Khan	Ali Khan	VPO, Jehangira	L/Attend	GHS Jehangira	AVP
89	Niaz Wali Shah	Musharaf Shah	VPO, Jehangira	Chowkidar	GHS Jehangira	AVP
90	Habibur Rehman	Abdur Rahim	VPO, Jehangira	Chowkidar	GPS Jehangira	AVP
91	Qamar Zaman	Aman Ullah	VPO, Jalbai	Chowkidar	GPS Azim Garhi	AVP
92	Shahid	Taj Bar Khan	VPO, Jalbai	Sweeper	GMS Jalbai	AVP
93	Gul Wahab	Abdul Qayyum	VPO, Jalbai	Chowkidar	GHS Jalbai	AVP
94	Gulroz	Shah Said	VPO, Jalbai	Chowkidar	GGPS Shahi Bagh Chuntrai Jalbai	AVP
95	Farman Ali	Noor Wali	VPO, Jalbai	Chowkidar	GPS Noor Jehan Dhok Jalbai	AVP
96	Sabil Shah	Bahader Shah	VPO, Och Khawar Jalbai	N/Qasid	GMS Jalbai	AVP
97	Naik Muhammad	Shamroz Khan	VPO, Manki	Chowkidar	GGHS Manki	AVP
98	Ajmal Khan	Karim Khan	VPO, Beka	Chowkidar	GHS Beka	AVP
99	Muhammad Rahman	Muhammad Nazif	VPO, Bazar	Chowkidar	GPS No.1 Bazar	AVP
100	Noor Hali	Sabz Ali	VPO, Nabi Dhok	N/Qasid	GGCMS Nabi Dhok	AVP
101	Zaman Khan	Lubab Shah	VPO, Zakarya Dheri	Chowkidar	GPS Dheri Zakarya	AVP

MCC/ 9/9/09

Attested



102	Ahmad Ali	Muhammad Israr	VPO, Tordher	Chowkidar	GPS Jabar Tordher	AVP
103	Ravaiz Khan	Gul Ambar	VPO, Lahor (W)	Sweeper	GHS Lahor (W)	AVP
104	M Amraiz Khan	Kamdar Khan	VPO, Lahor (W)	Chowkidar	GPS Samar Depo Lahor	AVP
105	Muzammil Khan	Muslim Khan	VPO, Lahor (W)	Chowkidar	GGHSS Lahor (W)	AVP
106	Abrar	Roidad	VPO, Lahor (E)	Chowkidar	GPS Pak Depo Lahor	AVP
107	Afzal Khan	Khan Afzal	VPO, Lahor (E)	Sweeper	GMS Lahor (E)	AVP
108	Wajed Ali	Ali Haider	VPO, Jehangira	Chowkidar	GPS Gharib abad JHR	AVP
109	Zar Muhammad	Zulqadar	VPO, Jalsai	Chowkidar	GPS Jalsai	AVP
110	Ziaur Rahman Muhammad Saeed Awan	Zarshad Dilawar Khan	VPO, Baloo	Chowkidar	GPS Gidaro Shakh Jalsar	AVP
111	Fuzia	Zakiuddin	VPO, Lahor (E)	Sweepress	GGHS Lahor (E)	AVP
112	Shafaat Ullah	Shamsher Khan	VPO, Baloo	Sweepress	GPS Baloo	AVP
114	Ashiq Muhammad	Namdar Khan	VPO, Uch Khawar	N/Oasid	GMS Uch Khawar	AVP
115	Adil Ahmad	Ali Ahmad	VPO, Kunda	Sweeper	GHS Kunda	AVP
116	Gharib Nawaz	Lubab	VPO, Lahor	Chowkidar	GGHSS Lahor (W)	AVP
117	Saeed ul Haq	Muhammad Quresh	VPO, Uch Khawar	Sweeper	GMS Uch Khawar Jalbat	AVP

PF-35

118	Gohar Ali	Salim Khan	VPO, Dodher	Chowkidar	GPS Dodher	AVP
119	Dosi Muhammad	Gohar Zaman	VPO, Gar Aka Khel	Chowkidar	GPS Gar Aka Khel	AVP
120	Syed Bibi	Faqir Muhammad	VPO, Jehanda	Sweepress	GGMS Jehanda	AVP
121	Akbar Hussain	Faqir Muhammad	VPO, Jehanda	N/Oasid	GGMS Jehanda	AVP
122	Haroon Muhammad	Sada Khan	VPO, Kaddi	Chowkidar	GHS Kaddi	AVP
123	Tariq Muhammad	Khan Pur	VPO, Kaddi	L/Attend:	GHS Kaddi	AVP
124	Sher Muhammad	Bahader Sher	VPO, Kotha	N/Oasid	GMS No.2 Kotha	AVP
125	Bakhtar Ullah Muhammad	Maiz Ullah	VPO, Kotha	N/Oasid	GMS No.2 Kotha	AVP
126	Suleman	Hamza Khan	VPO, Marghuz	Behishti	GCMHS Marghuz	AVP
127	Manzar Khan	Afzal Khan	VPO, Marghuz	Chowkidar	GGPS No 2 Marghuz	AVP
128	Salma	D/O Abdul Basit	VPO, Pabaini	L/Attend:	GGHS Pabaini	AVP
129	Fazal Zarin	Ghulam Jan	VPO, Pabaini	Chowkidar	GPS No 1 Pabaini	AVP
130	Amraiz Zaman	Hamzallah	VPO, Pabaini	Chowkidar	GGHS Pabaini	AVP
131	Zahir Shah	Zarin Khan	VPO, Kalabat	Chowkidar	GPS No.2 Kalabat	AVP
132	Qasim Ali	Akbar Ali	VPO, Panjman	Chowkidar	GGPS Bakyna Panjman	AVP
133	Hassan Khan	Hakim Khan	VPO, Panjman	N/Oasid	GGMS Panjman	AVP
134	Khalid Muhammad	Zarin Dad	VPO, Thandkoi	N/Oasid	GHSS Thandkoi	AVP
135	Roozul Amin	Zamin Khan	VPO, Yousafi	Chowkidar	GPS Yousafi	AVP
136	Fazal Haq	Waris Khan	VPO, Zaida	Sweeper	GGHS-2 Mansoor Khel Zaida	AVP
137	Nazir Muhammad	Ghulam Muhammad	VPO, Zaida	Chowkidar	GHSS Zaida	AVP
138	Sher Aman	Muhammad Afzal	VPO, Zaida	Chowkidar	GGHS No.1 Zaida	AVP
139	Ibrahim Ullah	Meri Khan	VPO, Zaida	Chowkidar	GHSS Zaida	AVP
140	Qasim Khan	Gokandar Khan	VPO, Zaida	Chowkidar	GHSS Zaida	AVP
141	Ismail Khan	Rasool Khan	VPO, Pabaini	L/Attend	GHS Pabaini	AVP
142	Siraj Ali Shah	Zwar Shah	VPO, Zarobi	Mali	GHS Zarobi	AVP
143	Habib Ullah Khan	Sardar Muhammad	VPO, Zaida	Sweeper	GMS Zaida	AVP
144	Mukisha Bibi	W/O Gul Khatab	VPO, Kunda	L/Attend:	GGHS Kunda	AVP
145	Mujebur Rahman	Muhammad Iqbal	VPO, Panjman	Sweeper	GMS Panjman	AVP
146	Yasir Khan	Noor ul Khilab	VPO, Zaida	Sweeper	GGMS Hund	AVP
147	Hazrat Hayat	Jalal Khan	VPO, Jehanda	L/Attend:	GHS Jehanda	AVP
148	Ata ur Rahman	Fazal Rahman	VPO, Zaida	Chowkidar	GPS No.3 Zaida	AVP

PF-36

149	Amjad Saeed	Muhammad Sultan	VPO, Maini	N/Oasid	GMS Gul Bahar Maini	AVP
150	Shari Zaman Khan	Sher Farzand Khan	VPO, Maini	Chowkidar	GGPS Garhi Khan Khel Maini	AVP
151	Muhammad Ali	Abdur Raziq	VPO, Maini	Chowkidar	GGHS Maini	AVP
152	Riaz Muhammad	Yar Muhammad	VPO, Baja	Chowkidar	GCMS Baja	AVP
153	Naz Begum	D/O Aslat Khan	VPO, Baja	Caller	GCMS Baja	AVP
154	Fauna	W/O Rahman Sher	VPO, Topi	Caller	JICA Model School Topi	AVP
155	Said Abbas Shah	Lumqman Shah	VPO, Topi	Chowkidar	GPS No.1 Topi	AVP
156	Astafa Nosh	Darwish	VPO, Topi	Sweeper	GMS No.2 Topi	AVP
157	Niaz Muhammad	Sartaj Khan	VPO, Gabai	Chowkidar	GPS No.5 Topi	AVP
158	Gul Rahman	Fazli Rahman	VPO, Gandaf	Chowkidar	GPS Gandaf	AVP

9/9/09

Attested

13

159	Aman Shah	Shahzad Baig	VPO, Gandaf	Chowkidar	GHS Gandaf	AVP
160	Munawar Khan	Sher Aman	VPO, Seri Utman Zai	N/Qasid	GMS Seri Utman Zai	AVP
161	Gul Nawas Khan	Sher aman	VPO, Seri Utman zai	Sweeper	GMS Seri Utman zai	AVP
162	Muhammad Riaz Khan	Said Wali Shah	VPO, Gabasni	Chowkidar	GPS Trait	AVP
163	Amir Zahid	Shah Zaman	VPO, Amrai Bala	Chowkidar	GPS Shah Zaman Banda	AVP
164	Jamshed Khan	Saniandar Shah	VPO, Achelai	Chowkidar	GGPS Achelai	AVP
165	Maher Shah	Qadir Shah	VPO, Ero Bori	Chowkidar	GPS Ero Bori	AVP
166	Muhammad Nazir	Saleh	VPO, Chack Sokilai	Chowkidar	GGPS Chack Sokilai	AVP
167	Bakht Wali Shah	Said Wali Shah	VPO, Pikrari	Chowkidar	GPS Pikrari	AVP
168	Khan Muhammad	Habib Khan	VPO, Bori	Chowkidar	GPS Bori	AVP
169	Muhammad Rafiq	Pir Badshah	VPO, Takail	N/Qasid	GGMS Takail	AVP
170	Said Nabi Shah	Gul Badshah	VPO, Takail	Chowkidar	GPS Gul Dara Takail	AVP
171	Said Nabi Shah	Mian Gul	VPO, Pula	Chowkidar	GPS Pula	AVP
172	Said Bahader	Shan Pur	VPO, Sokilai	Chowkidar	GPS Sokilai	AVP
173	Mir Dos Khan	Sadar Khan	VPO, Naro Banda	Chowkidar	GGPS Naro Banda	AVP
174	Amir Muhammad Khan	Manir Khan	VPO, Seri Utman Zai	Chowkidar	GPS Seri Utman Zai	AVP
175	Noor Saeed	Muhammad Saeed	VPO, Maini	Chowkidar	GPS No.2 Maini	AVP
176	Mir Khan Shah	Rehan Shah	VPO, Sandowa	Chowkidar	GPS Ulla Nakhtar Gudar	AVP
177	Sarzamin Khan	Sher Zaman Khan	VPO, Dagai (G)	N/Qasid	DDO(F) Topi	AVP
178	Bakht Afsar	Bahramand	VPO, Qadra	N/Qasid	GHS Qadra	AVP
179	Hussain Khan	Zain Khan	VPO, Qadra	Chowkidar	GPS Sumbal Hemlit	AVP
180	Muhammad Anwar	Khaista Zar	VPO, Malik Abad	Chowkidar	DDO(M) Topi	AVP
181	Muhammad Qadar	Mirawos Khan	VPO, Dagai (G)	Chowkidar	GPS Dewal	AVP
182	Muhammad Ayaz	Gul Rehan	VPO, Gandaf	Chowkidar	GGPS No.2 Gandaf	AVP
183	Zar Wali	Sadat Khan	VPO, Qadra	Chowkidar	GHS Qadra	AVP
184	Umer Daraz	Gul Bacha	VPO, Takail (G)	Chowkidar	GHSS Kabgani (G)	AVP
185	Ayaz Khan	Mian Khan	VPO, bar cham Gabasni	L/Attend	GHS Gabasni	AVP
186	Humayoon Khan	Muzammil Khan	VPO, Saiketer (G)	N/Qasid	GMS Gul Bahar Maini	AVP

**Terms and Conditions:-**

1. These appointments are purely temporary and liable to termination without assigning any reason and without any prior notice.
2. They will have to produce Health and Age Certificate from the Medical Superintendent DHQ Hospital Swabi before taking over charge.
3. They should not be handed over charge if their age is below 18 or above 45 & for backward area's candidates is 18 to 48 years.
4. They must take over charge of the post within 14 days; otherwise the appointment will stand automatically cancelled.
5. In case of resignation they will have to submit one month's prior notice; otherwise their one month pay will be forfeited to the Government. After tendering resignation, they will not leave their job until the acceptance of their resignation by the competent authority nor shall they be granted any leave.
6. In case any one of the above appointees deprives of receiving charge due to non availability of vacant post (in the station indicated against his/her name) his/her appointment order will be considered as cancelled.
7. They will be governed by the service rules framed by the Government from time to time.
8. They must be permanent domiciled of District Swabi.
9. No TA/DA etc is allowed to any one.
10. Charge reports should be submitted to all concerned.

(MUHAMMAD ZADA)  
EXECUTIVE DISTRICT OFFICER

**Attested**

(17)

17

2. Secretary to Govt. of NWFP Elementary & Secondary Education Department, Peshawar.
3. Director Elementary & Secondary Education NWFP, Peshawar.
4. District Nazim, Swabi.
5. District Coordination Officer, Swabi.
6. All Members of Departmental Selection Committee.
7. District Accounts Officer, Swabi.
8. Principals/Head Masters/Head Mistresses of the concerned schools.
9. All DDOs (M/F) District Swabi.
10. ADO (B&A/Estab.) Local Office.
11. Candidates concerned.

11/09/09  
EXECUTIVE DISTRICT OFFICER  
(ELEM. & SECOND. EDU. SWABI)

G.N. Khan/P.P.

  
Attested

Registered



(15) (2)

B

**DISTRICT EDUCATION OFFICE (MALE) SWABI**  
(Office phone & Fax No 0938280239, [emis\\_swabi@yahoo.com](mailto:emis_swabi@yahoo.com))

*[Handwritten signature]*

**NOTIFICATION.**

Whereas, you Mr. Muhammad Zaman, Chowkiar, GPS Marghuz, Village & Post Office Marghuz (Swabi), proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 on account of your disobedience, habitual late comer, involvement in drugs/ lock breaking and tearing of pages from the Service Books of the teachers of your school.

And whereas, the Show Cause notice was issued in the light of Enquiry conducted against you on dated 12.12.2018, but your reply received during personal hearing on dated 16.02.2019 was unsatisfactory.

And whereas, in your reply, you have admitted all these allegations and promised that in future you will not repeat these practices and department have the right to take action against you if found guilty again, which is clear cut confession of the charges leveled against you.

And whereas, you have confessed all the charges leveled against you, so being guilty of these charges the competent authority i.e. DEO(M) Swabi after having considered the charges and evidence on record is of the view that all the charges against you have been proved.

Now, therefore, in exercise of the powers conferred upon the undersigned under Section 4(b)(iii) of the Khyber Pakhtunkhwa (Efficiency & Discipline) rules, 2011, the competent authority is pleased to impose the major penalty of "Removal from Service" upon Mr. Muhammad Zaman, Chowkiar, GPS Marghuz Village & Post Office Marghuz (Swabi) with immediate effect.

**(JEHANGIR KHAN)**  
**DISTRICT EDUCATION OFFICER**  
**(MALE) SWABI**

Endst: No. 3005-61 / Absence/Comp./C-IV/F.No.5/dated Swabi the:- 9/3 /2019.

Copy of the above is forwarded for information and n/action to the:

1. Director Elementary & Secondary Education Khyber Pukhtunkhwa, Peshawar.
2. District Accounts Officer, Swabi.
3. SDEO(M) Swabi.
4. District Monitoring Officer, Swabi
5. ADEO(B&A/Estab)) Local Office.
6. Superintendent (Primary) Local Office.
7. Head Teacher, GPS Marghuz.
8. Mr. Muhammad Zaman, Chowkiar GPS Marghuz Village & Post Office Marghuz, Swabi (Under Registered cover).

*[Handwritten signature]*  
**DISTRICT EDUCATION OFFICER**  
**(MALE) SWABI**

**Attested**

کبیر ضاب ڈائریکٹر ضابط ایجوکیشن ضیبر فٹو گواہ لپتاور

*[Handwritten signature]*

عنوان: محمد اہد اہیل برہادر حکم/ فیصلہ از ڈسٹریکٹ ایجوکیشن آفیسر (MALE) صوابی

Endst No. 3005-4/Absence/Comp/C-IV/F. برآمد حکم نمبری  
No. S/dated Swabi The - 09/03/2019.

ضابطی! وجوہات اہیل حسب ذیل ہیں ہے۔

1. یہ کہ اپیلڈنٹ سال 2009ء میں مکہ تعلیم میں بھرتی ہو کر مورخہ 09/03/19 تک ڈورنٹ پرائمری سکول (برائے طلباء) میں بطور چوکیدار خدمات سرانجام دیتا رہا۔

2. یہ کہ مورخہ 09/03/19 کو ضابط ڈسٹریکٹ ایجوکیشن آفیسر (MALE) صوابی نے بروٹے چھی انٹرنیٹ قمرہ 09/03 کو بلہ جواز غیر قانونی طور پر اپیلڈنٹ کی خدمات کو DISCIPLINARY ACTION کا بہانہ بنا کر اپیلڈنٹ کو نوٹری سے برخاست کر دیا۔ (نقل چھی انٹرنیٹ لف ہے)

3. یہ کہ حکم مذکورہ قمرہ 09/03 غیر قانونی بلہ جواز خود ساختہ مہنی برہدیتی ہونے کی وجہ سے برہدتی بلہ جواز بحالی نہ ہے۔ بلکہ تہیاد دیگر وجوہ کے بلکہ 05 حکم مذکورہ قابل کالعدمی قابل مستوفی ہے۔ اور اپیلڈنٹ کی خدمات بطور چوکیدار قابل بحالی ہے۔

4. یہ کہ اپیلڈنٹ کو کوئی شوکار نوٹس نہیں دیا گیا ہے۔ بلکہ عینہ شوکار نوٹس جعلی فری اور خود ساختہ ہے یہ کہ عینہ شوکار نوٹس میں جملہ التزامات من گھڑت ہے بنیاد جعلی فری خود ساختہ مہنی برہدیتی بلہ ثبوت نہیں۔ چکا ڈر DEO (MALE) SWABI نے انٹرنیٹ چھی قمرہ 09/03 میں کی ہے۔ حالانکہ نہ تو اس اپیلڈنٹ کو کوئی شوکار نوٹس دیا گیا ہے۔ اور نہ جواب طلب کی گئی ہے۔

5. یہ کہ جملہ کاروائی بابت REMOVAL FROM SERVICE بنایت جلد بازی اور عروج قوانین کو بالائے طاقت دھکے کھائی ہے۔

6. یہ کہ من اپیلڈنٹ نہ تو DIS obedient ہے۔ اور چونکہ من اپیلڈنٹ چوکیداری پوسٹ پر تعینات ہے۔ اور تقریباً 12/12 گھنٹے اپنے ڈیوٹی پر ہوتا ہے۔ من طرح HABITUAL LATE COMER ہوسکتا ہے۔ اور اب تو BIO-metric System ہے۔ اور اسی طرح اپیلڈنٹ کے خلاف کوئی ثبوت موجود ہی نہ ہے۔ مزید برآں افسران ہمارے ساتھ ہر خلاف اپیلڈنٹ کو یہد لیکن (یعدہ بنایت INVOLVEMENT IN DRUGS اور نہ من اپیلڈنٹ کے خلاف افسران مجاز کے پاس TEARING OF PAGES FROM Service BOOKS اور LOCK BREAKING کی نسبت کو دستاویزی ثبوت موجود ہے۔ بلکہ جملہ کاروائی جعلی فری بلہ جواز بلہ بدل خود ساختہ و غیر قانونی طور پر کر کے اپیلڈنٹ کے بھولی اور اپیلڈنٹ کے حقد سے نوا نے چھین گئے ہیں۔ سرورس بک وغیرہ کو انچارج سکول کے پاس UNDER LOCK رکھے ہوئے ہیں۔ تو من طرح ایک معصوم بے گناہ اور بے خطا انسان جو کہ چوکیدار ہے۔ تو ناکردہ گناہ کا ذمہ دار ٹھہرایا گیا ہے یہ کہ اپیلڈنٹ کو افسران مجاز نے اپنی معافی پیش کرنے کا کوئی موقع نہیں دیا گیا ہے۔ بلکہ جملہ کاروائی جعلی فری اور صرف خانہ پری کی خاطر کی گئی ہے۔

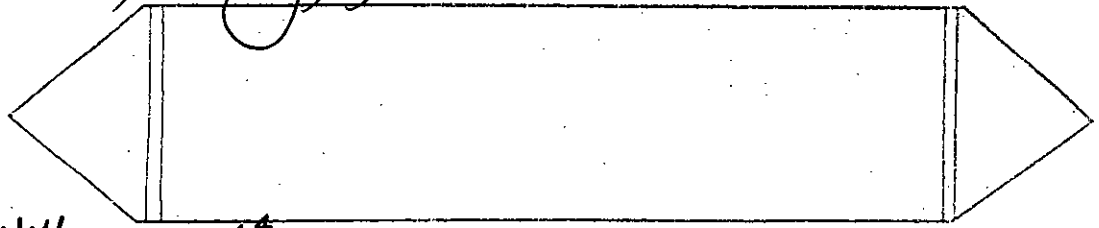
7. یہ کہ اپیلڈنٹ عزیزیت محنت کش اور اپنے نیکے کاواہد کھیل ہے۔ اور نوٹری چلیے جانے سے اپیلڈنٹ کے گھر میں خاتون کے لادہجہ آئی ہے۔

لطفہ استدل ہے۔ برہدتی اہیل جملہ فیصلہ از DEO (Male) Swabi قمرہ 09/03 کو کالعدم و مستوفی فرمایا جا کر اپیلڈنٹ کو اپنی بابقہ پوسٹ پر بحالی کے حکم صادر فرمایا

محمد رفائی چوکیدار دلہ شمس من مرنسز اکافل  
محمد قمرال تعیل و ضابط صوابی  
09. 28/19

*[Handwritten signature]*  
Attested

# بعد االت ضاب سرویس ڈیپارٹمنٹ لاہور



2019ء پنجاب ایبلانٹس - محرم

محرم 1441ھ اپیل ڈیپارٹمنٹ بنا نام DEOLM صوبی دعویٰ

مورخہ 24/7/19  
مقدمہ  
دعویٰ سرویس ایبل  
جرم

## باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
 آئن مقام کے لئے سرویس محرم 1441ھ کیلئے اپیل کیلئے  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقررات ہاں فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زراں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو کسی دہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور اس کا ساختہ  
 برداشتہ منظور قبول ہوگا۔ دوران مقدمہ میں جو شہر چہ ہر جائد التوائے مقدمہ کے سبب سے وہ ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل سنا حسب پابند ہوں گے۔ کہ پیروی  
 نہ کو کرے۔ لہذا اذکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم 24/7/2019

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 لاہور

اپیل ڈیپارٹمنٹ  
 محرم