


ORDER
14.02.2023


Nemo for the appellant. Mr. Asad Ullah, SDEO alongwith Mr. Umair Azam Khan, Additional Advocate General for official respondents present.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time, therefore, the appeal in hand stand dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
14.02.2023

SCANNED
POSTMASTER


(Fareeha Paul)
Member (E)

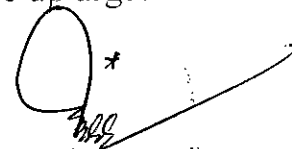

(Salah-Ud-Din)
Member (J)

25.11.2022

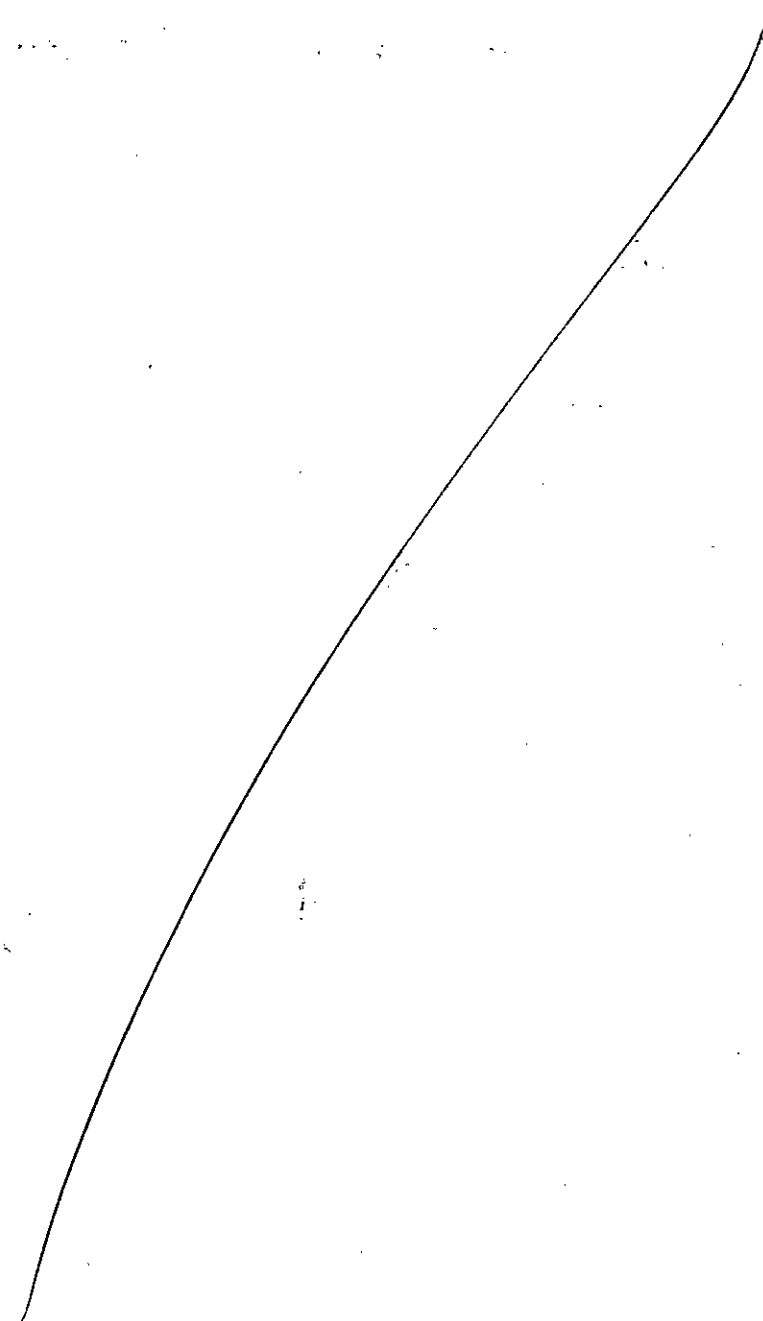
Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for official respondents present.

Learned Member Judicial Mr. Salah-ud-Din is on leave, therefore, bench is incomplete. Adjourned. To come up arguments on 14.02.2023 before the D.B.

SCANNED
Pesnawar



(Mian Muhammad)
Member (E)





22.07.2022

Appellant alongwith his counsel present.

Naseer Ud Din Shah, learned Assistant Advocate General alongwith Wajeeh Ud Din Shah Deputy Director and Asad Ullah ADEO for official respondents No.1 to 4 present. Private respondent No.5 present through counsel.


File to come up alongwith Service Appeal No.7774/2021 filed by the appellant on 12.08.2022 before D.B.


(Fareeha Paul)
Member(E)


(Rozina Rehman)
Member (J)

12-8-2022

Proper DB not available the case
is adjourned to 30-9-2022

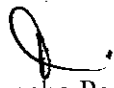

Reader


30.09.2022

Appellant present in person.

Muhammad Jan, learned District Attorney for respondents present.

Former made a request for adjournment as his counsel is not available today. Adjourned. To come up for arguments on 25.11.2022 before D.B.

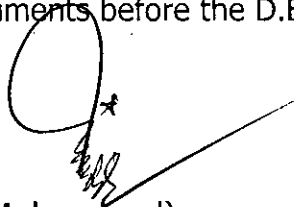

(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

27.04.2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Asadullah, Subject Specialist for respondents present.

Applicant alongwith Junior of his counsel present and submitted an application for impleadment of one Habib Ur Rehman SPET presently posted in DEO office Orakzai as respondent in the instant service appeal on the ground that valuable rights of the petitioner are involved in the matter. Learned counsel for the appellant put no objection on the impleadment application, therefore, in order to reach a right and just conclusion, the impleadment application is allowed and the petitioner is arrayed as respondent in the instant appeal. To come up for written reply/parawise comments on behalf of the impleaded respondent as well as arguments before the D.B on 17.05.2022.



(Mian Muhammad)
Member(E)



(Salah Ud Din)
Member(J)

17.05.2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General on behalf of official respondents No. 1 & 4 present. Mr. Umer Farooq, Advocate on behalf of private respondent No. 5 present.

Reply on behalf of private respondent No.5 submitted, which is placed on file and copy of the same handed over to the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 09.06.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-ud-Din)
Member (J)

9.6.2022

Proper D.B is not there, therefore the case is adjourned to 22-7-22 for same.




12.08.2021

Appellant present in person.

Javid Ullah learned A.A.G for respondents present.

Former made a request for adjournment as his counsel is not available today; granted. To come up for arguments on 28.09.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

28.9.21

DB is on tour case to come up
For the same on Dated. 3-2-22

~~B~~
Reader

03.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 27.04.2022 for the same as before.



Reader

25.06.2021

Junior to counsel for appellant present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Former made a request for adjournment as senior counsel is not available today. Adjourned. To come up on 15.07.2021 for hearing before D.B.



(Rozina Rehman)
Member(J)




Chairman

15.07.2021

Appellant in person present.

Muhammad Adeel Butt learned Additional Advocate General alongwith Asad Ullah ADO for respondents present.

Former made a request for adjournment as his counsel is busy before Hon'ble Peshawar High Court; granted. To come up for arguments on 12.08.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

Post Script
03.06.2021

Counsel for appellant present.

Muhammad Rasheed learned Deputy District Attorney alongwith Fareed Ullah District Accounts Officer, Hussain Ahmad Focal Person and Asad Ullah ADEO for respondents present.

Learned counsel seeks time for arguments with request for adjournment of the case for 08.06.2021. the request is accorded. To come up for arguments on 08.06.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

08.06.2021

Appellant with counsel present.

Muhammad Rasheed learned Deputy District Attorney for respondents present. Respondent No.3 in person present.

After hearing arguments at certain length, a point popped up as to what are the conditions of service of Physical Supervisor particularly with reference to method that how it is to be filled and whether its incumbency is fixed or transferable. When the respondents were confronted with this point with further direction to clear the position in terms of rules made under Sub (2) of Rule-3 of Khyber Pakhtunkhwa Government Servants, (Appointment, Promotion & Transfer) Rules, 1989, they have sought time for assistance of the Tribunal on the next date. Request is accorded. To come up on 25.06.2021 for arguments. Learned counsel for appellant informed that salary of the appellant is stopped, therefore, there is need for hearing the appeal by short date.



(Rozina Rehman)
Member (J)




Chairman

03.06.2021

Appellant in person alongwith counsel Safdar Iqbal Khattak Advocate are present.

Muhammad Rasheed learned Deputy District Attorney alongwith Fareed Ullah District Accounts Officer, Hussain Ahmad Focal Person and Asad Ullah ADEO for respondents present.

The learned counsel for appellant submitted an application for release of salary of the appellant for the months of March, April and May 2021 but before submission of that application, he with permission of the Bench, made certain requests that the appellant has been forcibly restrained for performance of the duty by the respondents and obviously for his own reasons, he apprised the Tribunal with certain emotional grounds regarding predicament of the overall governance in the Province. When it was ascertained that the comments on behalf of the respondents have been submitted and the respected representatives alongwith Muhammad Adeel Butt learned A.A.G are present, the learned counsel was requested to start his arguments on merit, but he insisted that firstly this Bench should pass an order about non-compliance of previous interim injjective order. Obviously, the violation of the interim injjective order if found genuine, can be dealt with at the time of passing of the final judgment but in no way it can be pressed into service as ground for refusal to argue the appeal on merits. The case is adjourned for one hour till 1:41 P.M. Bench will hear the arguments and if the appellant fails to submit the arguments in compliance with this order, his appeal shall be dismissed in default.


(Rozina Rehman)
Member (J)


Chairman

Appeal No. 13576/2020
S. Awan Ali Shah vs Govt

12.03.2021

Appellant alongwith counsel present.


Asif Masood Ali Shah learned Deputy District Attorney alongwith Asad Ullah Subject Specialist for respondents present.

Rejoinder submitted. Learned counsel for appellant submitted that operation of the impugned notification dated 02.07.2020 was suspended by this Tribunal vide order dated 30.11.2020 but the respondents stopped the appellant from his official duty.

In view of submission of learned counsel for appellant, representative of respondents is directed to make sure the presence of respondents No.2 & 3 before this Tribunal on the next date of hearing.

Adjourned to 14/04/2021 for further proceedings before D.B. The restraint order dated 30.11.2020 shall remain operative till the next date of hearing.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

14.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 03.06.2021 for the same as before.


Reader

25.01.2021

Appellant is present alongwith his counsel Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Asadullah, ADEO (Litigation) on behalf of respondent No. 3 and Mr. Hussain Ahmed, Focal Person, on behalf of respondent No. 2, are also present.

Representative of respondent No. 3 furnished written reply on behalf of the said respondent which is placed on record. Representative of respondent No. 2 stated that he relies on the written reply submitted by respondent No. 3 on behalf of respondent No. 2. File to come up for rejoinder and arguments on 12.02.2021 before D.B.

In the meanwhile the operation of impugned notification bearing endorsement No. 887-92/A-12/E-7 dated 02.07.2020 shall remain suspended if not already acted upon till the date fixed.

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

12.02.2021

Appellant in person and Addl. AG alongwith Asadullah, SS for the respondents person present.

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant matter is adjourned to 12.03.2021 for hearing before the D.B. The restraint order dated 30.11.2020 shall remain operative till next date of hearing.

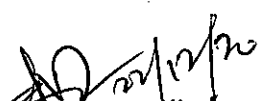
(Atiq-ur-Rehman Wazir)
Member(E)

Chairman

21.12.2020

Appellant present through counsel.

An application for grant of permission to deposit security and process fee, was submitted which is allowed with direction to deposit the same within 3 days positively, where-after, notices be issued to respondents for written reply/comments for 08.01.2021 before S.B.


Appellant Deposited
Security & Process Fee

In the meanwhile the operation of impugned notification bearing endorsement No:887-92/A-12/E-7 dated 02.07.2020 shall remain suspended if not already acted upon till the date fixed.

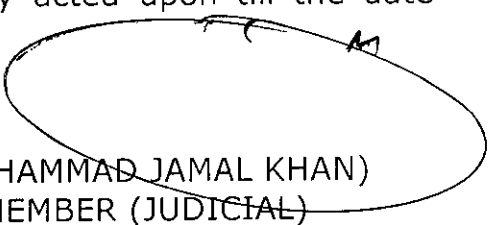

(Rozina Rehman)
Member (J)

08.01.2021

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Asadullah, S.S, for the respondents are also present.

Written reply on behalf of respondents not submitted. Representative of the department seeks further time for submission of written reply/comments. Time is allowed. File to come up for written reply/comments on 25.01.2021 positively before S.B.

In the meanwhile the operation of impugned notification bearing endorsement No. 887-92/A-12/E-7 dated 02.07.2020 shall remain suspended if not already acted upon till the date fixed.


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

30.11.2020

Appellant in person alongwith Mr. Safdar Iqbal Khattak, Advocate, are present.

Learned counsel for the appellant contends that the transfer order made on 02.06.2020, was later on withdrawn by virtue of notification dated 02.07.2020 which is contrary to the posting transfer policy as in vogue in the province however, since the post is still vacant, therefore, neither he has relinquished the charge nor he has been relieved there from and he stressed that the order so made was the result of extraneous pressure emanating from a political figure/office holder, calling in question the very order in the departmental appeal but it proved ineffective thus paving way for the instant service appeal.

The points so agitated at the bar needs consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 21.01.2021 before S.B.

In the meanwhile the operation of the impugned notification bearing endorsement No. 887-92/A-12/E-7 dated 02.07.2020 shall remain suspended if not already acted upon till the date fixed.

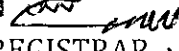


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

Form-A

FORM OF ORDER SHEET

Court of _____

Case No. - 13576 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/11/2020	<p>The appeal of Syed Awan Ali Shah resubmitted today by Mr. Safdar Iqbal Khattak 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,</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30/11/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

This is an appeal filed by Syed Awan Ali Shah today on 10/09/2020 against the order dated 02.07.2020 against which he preferred/made departmental appeal/ representation on 20.07.2020 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- ① Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be flagged.
- 3- Annexures of the appeal may be attested.

No. 2659 /ST,

Dt. 11-09 2020.

Law
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Safdar Iqbal Khattak Adv. Pesh.

Re-Submitted to the needed correction
as the objection of pre-mature
the same may kindly forwarded
to the learned bench.

[Signature]
3/11/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

S.A. No. _____/2020

Syed Awan Ali Shah.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Education and others.....Respondents

I N D E X

S#	Description of documents.	Annexure	Pages.
1.	Service Appeal.		1-4
2.	Affidavit		5
3.	Addresses of the parties.		6
4.	Stay application		7-8
5.	Affidavit.		9
6.	Copy of appointment order dated 02.09.2005	A	10-11
7.	Copy of application	B	12-13
8.	Copy of transfer order dated 02.06.2020	C	14-15
9.	Copy of the order dated 02.07.2020	D	16-17
10.	Copy of departmental appeal	E	18-19
11.	Wakalatnama		20

Appellant

Through


Safdar Iqbal Khattak
Advocate High Court

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

13576

S.A. No. _____/2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10072

Dated 10/9/2020

Syed Awan Ali Shah son of Syed Zamin Jan
R/o caste Bar Muhammad Khel, Tapa Baba Nawasi
Kharki, P.O. Kurez, Tehsil Lower District Orakzai

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat, Peshawar.
2. Director Elementary and Secondary Education, near GHSS No.1, G.T. Road, Peshawar.
3. District Education Officer, Orakzai at Hangu
4. Deputy Director (Estb) Merged Districts

Hakim ur Rahman SPET, posted in DDO office Orakzai
..... Respondents

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974.

RESPECTFULLY SHEWETH:-

Filed to-day

Registrar
10/9/2020

1. That appellant was initially appointed as Physical Education Teacher (BPS-15) on 02.09.2005 in G.M.S. Avimela District Orakzai. (Copy of appointment order is attached as Annexure "A").

Re-submitted to-day and filed.

Registrar
3/11/2020

2. That on 10.02.2020 the appellant submitted an application to the respondent No.2 for his transfer from GHS Avimela to the office of District Education Officer,

2

Orakzai for the post of Physical Supervisor. (Copy of application is Annexure "B")

3. That as accordingly the appellant was transferred from GHS Avimela to the office of District Education Officer vide order dated 02.06.2020. (Copy of transfer order is attached as Annexure "C").
4. That the appellant took over charge and started work at the office of District Education Officer, Orakzai. In the meanwhile after a month on 02.07.2020 the earlier order dated 02.06.2020 was withdrawn and the appellant was again transferred to his own post at GHS Avimela which is impugned. (Copy of the order dated 02.07.2020 is attached as Annexure "D").
5. That the appellant filed departmental appeal dated 20.07.2020 before the respondent No.2, but in vain. (Copy of departmental appeal is Annex "E")
6. That the appellant filed writ petition No.3503-P/2020 before hon'ble Peshawar High Court, Peshawar, which was withdrawn with permission to approach the proper forum, hence the instant appeal on following amongst other grounds:-

GROUND

- A. Because appellant is permanent resident of District Orakzai and served more than 15 years, during this period no complaint has been registered against the appellant.
- B. Because the normal tenure of posting i.e. 3 years has not been completed by the appellant.

- C. Because if the appellant waits for the outcome of the departmental appeal for 90 days and thereafter, approach the learned Service Tribunal, the very purpose of the policy would vanish and the appellant will not be able to get the relief as per their own posting/ transfer policy.
- D. That the impugned order is issued under political influence and to accommodate their blue-eyed person.
- E. Because the impugned order is the result of sheer malice and is an arbitrary, whimsical, capricious order, which needs to be declared without lawful authority and against the law by this hon'ble Court.
- F. Because as per Article 4 of Constitution of Pakistan, 1973 every citizen is required to be dealt in accordance with law, which is fundamental right of appellant.
- G. Because appellant has been discriminated thereby downtrodden Article 25/27 of the Constitution of Pakistan, 1973.

PRAYER

It is, therefore, very humbly prayed that, on acceptance of this appeal, order dated 02.07.2020 passed by respondent No.2 may please be declared as illegal, without lawful authority and in flatten disregard of their own Posting & Transfer Order Policy, as appellant is not permitted to perform duty without completion of normal tenure i.e. 3 years.

OR

4

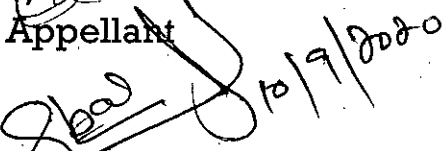
Respondent No.2 may please be directed to decide the departmental appeal as per the Posting and Transfer Policy within 15 days, so as to approach the learned Service Tribunal and till then the operation of the impugned order is suspended.

Any other relief deemed fit may also be graciously granted.



Appellant

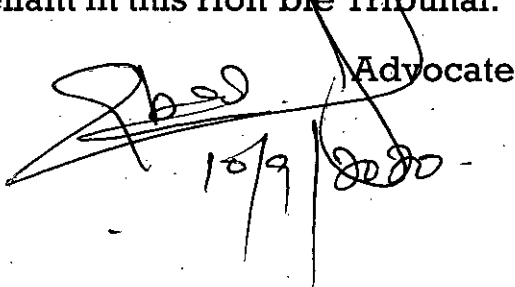
Through

 10/9/2020

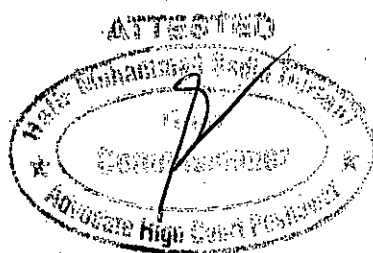
Safdar Iqbal Khattak
Advocate High Court

CERTIFICATE

It is certified that, no such like service appeal has earlier been filed by the appellant in this Hon'ble Tribunal.

 10/9/2020
Advocate

10 SEP 2020



5

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

S.A. No. _____/2020

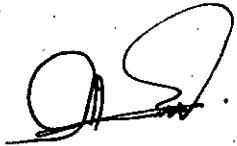
Syed Awan Ali Shah.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Education and others.....Respondents

AFFIDAVIT

I, Syed Awan Ali Shah son of Syed Zamin Jan R/o caste Bar Muhammad Khel, Tapa Baba Nawasi Kharki, P.O. Kareez, Tehsil Lower District Orakzai (Appellant), do hereby, solemnly declare on oath that the contents of the **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



DEPONENT

CNIC 21603-9663268-7

Cell: 0335-5478639

10 SEP 2020



6

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

S.A. No. _____/2020

Syed Awan Ali Shah.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Education and others.....Respondents

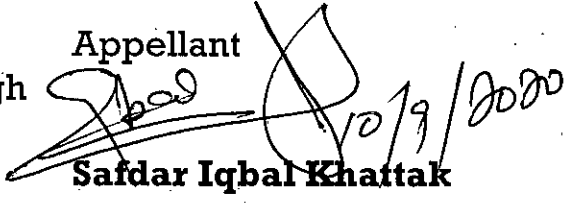
MEMO OF ADDRESSES

APPELLANT

Syed Awan Ali Shah son of Syed Zamin Jan
R/o caste Bar Muhammad Khel, Tapa Baba Nawasi
Kharki, P.O. Kurez, Tehsil Lower District Orakzai

RESPONDENT

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat, Peshawar.
2. Director Elementary and Secondary Education, near GHSS No.1, G.T. Road, Peshawar.
3. District Education Officer, Orakzai at Hangu
4. Deputy Director (Estb) Merged Districts

Through Appellant

Safdar Iqbal Khattak
Advocate High Court

(7)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

S.A. No. _____/2020

Syed Awan Ali Shah.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Education and others.....Respondents

APPLICATION FOR RESTRAINING THE
APPELLANT FROM TAKING CHARGE
OR OPERATION OF IMPUGNED
ORDER DATED 02.07.2020 MAY BE
SUSPENDED TILL DECISION OF MAIN
CASE OR TILL DECISION OF
DEPARTMENTAL APPEAL.

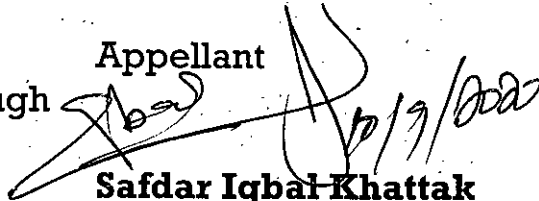
Respectfully Sheweth;

- 1) That the above titled appeal is being filed before this Hon'ble Tribunal in which no date has yet been fixed.
- 2) That grounds of appeal may be read as part and parcel of this application.
- 3) That prima facie arguable case exists in favour of petitioner/ appellant and is sanguine about its success.
- 4) That balance of convenience also lies in favour of petitioner/ appellant.
- 5) That if the relief as prayed is not granted, petitioner will suffer irreparable loss.

8

It is, therefore, prayed that on acceptance of this application, Respondents may please be restrained from taking charge from the appellant till decision of the case or operation of the impugned order dated 02.07.2020 may please be suspended till decision of main case or till decision of the departmental appeal.

Appellant
Through



Safdar Iqbal Khattak
Advocate High Court

9

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

S.A. No. _____/2020

Syed Awan Ali Shah.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Education and others.....Respondents

AFFIDAVIT

I, Syed Awan Ali Shah son of Syed Zamin Jan R/o caste Bar Muhammad Khel, Tapa Baba Nawasi Kharki, P.O. Kareez, Tehsil Lower District Orakzai (Appellant), do hereby, solemnly declare on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

DEPONENT

CNIC 21603-9663268-7

Cell: 0335-5478639

11 0 SEP 2020

ATTESTED



APPOINTMENT ORDER OF PET (M)

As approved by the Departmental selection committee. The following Male candidates are hereby appointed against the vacant posts of PET in BPS- 9 @ Rs. 2770:- PM (2770-165-7720) plus usual allowances as admissible under the rules on purely contract basis for the period of three years in the interest of public service w.e.f. the date of his/her taking over charge.

S.No	Name of Candidates	Fathers Name	Place of Posting	Remarks
1	Shahid Ali	Sardar Ali	GMS Sabzi Khel	Against Vacant Post
2	Asadullah	Azram Khan	GHS Spidar	-do-
3	Chaman Khan	Sawab Khan	GMS Inzar Patti	-do-
4	S Awan Ali Shah	S Zamin Jan	GMS Awi Mela	-do-

Note:-

- Charge Report in duplicate should be submitted to all concerned.
- The appointment order is made purely on temporary basis and liable to termination any stage and time without assigning any reason notice.
- If the appointee wants to resign from service he/she/they will have to give one month prior notice OR one months pay will be forfeited in lieu thereof.
- He/she/They will not be entitled to get pay unless his/her their domicile NIC and his/her/their academic/professional qualifications are verified from the institution concerned.
- The pay scale and service rules should be subject to the revision in accordance with the orders passed by the Government from time to time.
- He/she/They should not be handed over charge if their age exceeds 35 years or is less than 18 years except those who are entitled for relaxation under the rules.
- If he/She/they failed to take over charge within fifteen days w.e.f issue of this order his/her/ their appointment order will be considered as cancelled.
- He/she/They should produce his/her/their health and age certificate from the Agency Surgeon Orakzai Agency.

sd/-
Agency Education Officer
Orakzai Agency at Hangu.

Endst No 2264-72 dated Hangu the 2/9/2005.

Copy to the:-

- Director of Education FATA N.W.F.P. Peshawar
- Political Agent Orakzai Agency at Hangu.
- Agency Accounts Officer Orakzai Agency at Hangu.
- 4-5. AAEO(Concerned) & Pay clerk of the local office.
- 6-9. Candidates concerned.

Attended to be true copy of the original

sd/-
Agency Education Officer
Orakzai Agency at Hangu

11



BETTER COPY

OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY AT HANGU.

APPOINTMENT ORDER OF PET (M):

As approved by the departmental selection committee. The following male candidates are hereby appointed against the vacant posts of PET in BPS-9@ Rs. 2770/- PM (2770-165-7720) plus usual allowances as admissible under the rules on purely contract basis for the period of three years in the interest of public service w.e.f. the date of his/her their taking over charge.

S.No.	Name of candidates	Fathers Name	Place of posting	Remarks
1.	Shahid Ali	Sardar Ali	GMS Sabzi Khel	-do-
2.	Asadullah	Azram Khan	GHS Spidara	-do-
3.	Chaman Khan	Sawab Khan	GMS Inzar Patti	-do-
4.	S. Awan Ali Shah	S. Zamin Jan	GMS Awi Mela	-do-

NOTE:

1. Charge report in duplicate should be submitted to all concerned.
2. The appointment order is made purely on temporary basis and liable to termination any stage and time without assigning any reason notice.
3. If the appointee wants to resign from service he/she/they will have to give on month prior notice OR one months pay will be forfeited in lieu thereof.
4. He/She/They will not be entitled to get pay unless his/her their domicile/NIC and his/her/their academic/professional qualifications are verified from their institution concerned
5. The pay scale and service rules should be subject to the revision in accordance with the orders passed by the government from time to time.
6. he/she/they should not be handed over charge if their age exceeds 35 years or is less then 18 years except those who are entitled for relaxation under the rules.
7. If he/she/they failed to take over charge with in fifteen days w.e.f issue of this order his/her/their appointment order will be considered as cancelled.
8. he/she/they should produce his/her/their health and age certificate from the agency surgeon Orakzai Agency.

Agency Education Officer
Orakzai Agency at Hangu

Endost No. 2264-72 dated Hangu the 02/09/2005

Copy to the:

1. Director of Education FATA N.W.F.P Peshawar
2. Political Agent Orakzai Agency at Hangu
3. Agency accounts Officer Orakzai Agency at Hangu
- 4-5. AAEO (concerned) & Pay clerk of the local office.
- 6-9. Candidates concerned.

[Handwritten Signature]
Attested to be true
COPY [Handwritten Signature]

120



To
The director,
Elementary & secondary education,
Peshawar kpk.

Subject: Transfer from GHS Awi Mela to DEO office Orakzai for the post of the physical supervisor

Respected sir,

I am to refer you to the subject noted above that I, Mr S.Awan Ali Shah (SPET-16) IS serving at central tehsil 02-09-2005 at the above mentioned school. I am the permanent resident of lower tehsil district orakzai agency. Being the sole bread winner of my family I am having serious problems due to my duty nature. I have to stay there for weeks for away from my home. Distance from my home to school is about 200kms.

Therefore, you are humbly requested to consider my application that I may be transferred from GHS Awi Mela district Orakzai ~~to DEO office~~ to DEO office district Orakzai as physical supervisor. I will be highly grateful to you for this act of kindness.

Dated: 10/02/2020

yours sciencerly,

S.Awan Ali Shah

SPET GHS Awi Mela

District Orakzai.

Forwarded with the remarks that Mr Habib was - Return already working in the post for the past of 10 years. So the case is submitted.

Attested to be true copy
ATTESTED

District Education Officer,
District Orakzai

*M/M-~~xxxx~~
process.*

18/02/2020

Attested to be true copy of the original

13

BETTER COPY

TO

The Director,
Elementary & Secondary Education,
Peshawar KPK

Subject: Transfer from GHS Awi Mela to DEO office Orakzai for the post of the physical supervisor.

Respected Sir,

I am to refer you to the subject noted above that I, Mr. S. Awan Ali Shah (SPET-16) IS serving at Central Tehsil. 02-09-2005 at the above mentioned school. I am the permanent resident of lower tehsil District Orakzai agency. Being the sole bread winner of my family. I am having serious problems due to my duty nature. I have to stay there for weeks for away from my home. Distance from my home to school is about 200 kms.

Therefore, you are humbly requested to consider my application that I may be transferred from GHS Awai Mela District Orakzai to DEO office district Orakzai as physical Supervisor. I will be highly grateful to you for this act of kindness.

Dated: 10/02/2020

Yours sincerely,

S. Awan Ali Shah
SPET GHS Awai Mela
District Orakzai

9h
Attested to be true
copy of the original

ATTESTED
9h

14



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210339, 9210938,

091-9210437, 9210957, 9210458

Fax 091-9210936

Notification

The transfer of the following SPETs are hereby ordered with effect from the date of their taking over charge in the school/Office as noted against each in the interest of public service

S.No.	NAME of SPET	Present place of posting	Transfer to	Remarks
1	Muhammad Uf Rehman	District Education office Orakzai	GHS Awi Mela District Orakzai	Vice S.No.2
2	Mawana Ahsanullah SPET	GHS, Awi Mela District Orakzai	District Education office Orakzai	Vice S.No.1

Note

1. Charge report should be submitted to all concerned.

2. No TA/DA is allowed.

Attested to true copy
ATTESTED

DIRECTOR

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Order No. *1000/2020* / 2020

Dated Peshawar the *2/11/2020*

Copy forwarded for information on and in necessary action to the

1. District Education Officer Orakzai.

2. District Education Officer Orakzai

3. Headmaster GHS Awi Mela Orakzai

4. Deputy Director, Elementary and Secondary Education Peshawar

Page 1/1

E. J. Khan
Deputy Director

2 bel
Attested to be true copy of the original

15



BETTER COPY

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR
Ph No. 091-921039, 9210838**

Notification:

The transfer of the following SPETs are hereby ordered with effect from the date of their taking over charge in the school/office as noted against each in the interest of public service.

S.No.	Name of SPET	Present Place of posting	Transfer to	Remarks
1.	Habib ur Rehman	District Education Office Orakzai	GHS Awi Mela District Orakzai	Vice S.No. 2
2.	S. Awan Ali Shah	GHS Awi Mela District Orakzai	District Education Office Orakzai	Vice S.No. 1

Note:

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

**DIRECTOR
Elementary & secondary Education
Khyber Pakhtunkhwa Peshawar**

Endost No. _____ dated Peshawar the 02/06/2020

Copy forwarded for information and necessary action to the:

1. District Education officer Orakzai
2. District Accounts officer Orakzai
3. Head Master GHS Awai Mela Orakzai
4. PA to Director Elementary And Secretary education Peshawar
5. Master File.

Deputy Director

[Handwritten signature]
ATTESTED
Attested to be true copy of the original


**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA, PESHAWAR.**

Notification

Consequent upon the approval of the competent authority, the transfer notification in respect of Mr. Habib Ur Rehman SPET and Mr. Syed Awan Ali Shah PET issued vide this Directorate under Endorsement No. 60-64 dated 2-06-2020, is hereby withdrawn in the interest of public service with immediate effect.

Furthermore the services of Mr. Habib Ur Rehman SPET are hereby placed at the disposal of DEO Orakzai for further posting against the vacant post of SPET.

Compliance report should be sent to all concerned.

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

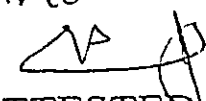
Endst. No. 887-92 /A-12/ E-7


Dated Peshawar: the 2/7 2020

Copy forwarded to the:-

1. District Education Officers District Orakzai.
2. District Accounts Officers District Orakzai.
3. Headmaster concerned.
4. Teachers concerned.
5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
6. P/Files.


Deputy Director (Estab)
Merged Districts

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True copy

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copy of the original

17

To,

THE DIRECTOR (E&SE) DEPARTMENT KHYBERPAKHTUN KHAWA
PESHAWAR.

SUBJECT:- DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 02/07/2020
WHEREBY THE APPELLANT WAS TRANSFERRED / CANCELLED FROM D.E.O
OFFICE ORAKZAI TO G.H.S AWI MELA ORAKZAI PRE MATURELY IN DUE TO
POLITICAL INTERFERENCE.

Respect Sir,

Most humbly it is submitted that the appellant was appointed as P.E.T in the education department vide order dated 02-09-2005 in G.H.S Awi Mela. That appellant served the department at the concerned station for more than fifteen years and lastly the appellant was transferred to D.E.O Office Orakzai dated 02/06/2020. That just after the lapse of one month the appellant was again prematurely transferred / Cancelled by Director Elementary and Secondary Education vide order 02/07/2020 from D.E.O Office to G.H.S Awi Mela. That the impugned order is against the transfer / posting Policy of the Government of Khyber Pakhtunkhwa.

It is, therefore, humbly prayed that on acceptance of this Departmental appeal the impugned order dated 02/07/2020 may very kindly be set aside and the appellant may not be transferred / Cancelled from D.E.O Office Orakzai till completion of his normal tenure. Any other remedy which your good self deems that may also be awarded in favor of appellant.

Dated :- 20/07/2020

No 2052
20/7/2020

Attested to
the type
ATTESTED

Appellant

Syed Awan Ali Shah

20/07/2020

S.P.E.T (BPS-16) D.E.O

Office Orakzai

Attested to be true
copy of the original

16



BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR

W.P.No. _____/2020

Syed Awan Ali Shah son of Syed Zamin Jan
R/o caste Bar Muhammad Khel, Tapa Baba Nawasi
Kharki, P.O. Kurez, Tehsil Lower District Orakzai



.....Petitioner★

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat, Peshawar.
2. Director Elementary and Secondary Education, near GHSS No.1, G.T. Road, Peshawar.
3. District Education Officer, Orakzai at Hangu
4. Deputy Director (Estb) Merged Districts

..... Respondents

WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973

RESPECTFULLY SHEWETH:-

1. That petitioner was initially appointed as Physical Education Teacher (BPS-15) on 02.09.2005 in G.M.S. Avimela District Orakzai. (Copy of appointment order is attached as Annexure "A").
2. That on 10.02.2020 the petitioner submitted an application to the respondent No.2 for his transfer from GHS Avimela to the office of District Education Officer,

CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court, Peshawar
Authorised Under Article 8.7 of
the Qanun-e-Shahadat Order 1984

20 AUG 2020

19

PESHAWAR HIGH COURT, PESHAWAR
FROM 'A'
FORM OF ORDER SHEET

COURT OF
CASE NO.

SERIAL NO OF ORDER OR PROCEEDINGS	DATE OF ORDER OR PROCEEDINGS	ORDER OR OTHER PROCEEDINGS WITH SIGNATURE OF JUDGE OR MAGISTRATE AND THAT OF PARTIES OR COUNSEL WHERE NECESSARY.
1	2	3

19.08.2020

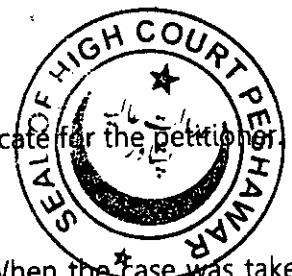
W.P. No. 3503-P/2020 with IR.

Present: -

Mr. Safdar Iqbal Khattak, advocate for the petitioner.

~ ~ ~

WAQAR AHMAD SETH CJ:- When the case was taken up for hearing, learned counsel for the petitioner requests for withdrawal of instant petition with permission to approach the proper forum. Order accordingly. *[Signature]*



[Signature]
CHIEF JUSTICE

[Signature]
JUDGE

ANNOUNCED
19.08.2020.

No. 5010

Date of Presentation in Application 19/8/2020

No of Page 2

Copying fee ---

Total ---

Date of Preparation of Copy 20/8/2020

Date of Delivery of Copy 20/8/2020




Received By [Signature]

[Signature]

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EXAMINER
Peshawar High Court, Peshawar
Instituted Under Article 87 of
the Constitution of Pakistan - Shariat Order 1980

20 AUG 2020

قیمت 50 روپے	58616	  
ایڈوکیٹ: <u>سید علی حسرت</u> بار کونسل ایسوسی ایشن نمبر: ۱۰-۱۵-۶۹۶۹-۵۷ رابطہ نمبر: ۵۹۸۵۵۰۴۹		

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سروس ٹریبونل سپر لیٹو خواہ

منجانب: <u>Appellait</u>	دعویٰ:
سید الموان علی سید	علت نمبر:
بنام	مورخہ:
گورنمنٹ و پبلک سروس ٹریبونل	جم:
	تھانہ:

باعث تحریر آنکہ

سید الموان علی سید ولد سید حسین جان

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام سید علی حسرت کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جو جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: سید علی حسرت
 PUNJAWAR BAR ASSOCIATION
 KHAYBER PAKHTUNKHA
 خیبر پختونخواہ

مقام پشاور کے لیے منظور ہے۔

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR .

Service appeal No.13576/2020.

Syed Awan Ali ShahAppellant.

Versus

Secretary Education & others.....Respondents

INDEX

S. No	Description of documents	Annexure	Pages
1	Comments / Affidavit	-----	1-2
2	Competent Authority / DEO Competency.	A	3-4
3	Screen Shot/ Copy of allegation of Social Media by the Appellant	B	5
4	Complaint of Elders against the Appellant	C	6

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR .

Service appeal No.13576/2020.

Syed Awan Ali ShahAppellant.

Versus

Secretary Education & others.....Respondents

Comments on behalf of Respondent No.2 & 3.

Preliminary objections.

- That the appellant was incompetent in discharging of his duties as physical supervisor, hence relieved from the charge of Physical Supervisor.
- That complaint has been lodged against the appellant.
- That the District Education Officer is the Competent Authority for making posting / transfers from BS-1 to BS-16.
- That the appellant has got no cause of action, locus standi to file the instant appeal.
- That the appellant has not come to this Court with clean hands.
- That the appeal is not maintainable in the present form.
- That the appellant is estopped by his own conduct to bring the instant appeal.
- That the appeal is badly time barred.
- That the appellant has concealed material facts from the Honorable Service Tribunal.

ON FACTS.

1. That para-1 pertains to the record of the appellant, hence needs no comments.
2. No comments, subject to record.
3. That correct to the extent that he was transferred to the office of the District Education Office Orakzai, but he was incompetent in discharging his duties. The erstwhile FATA is the parcel of Khyber Pakhtunkhwa and needs the services of competent officers / officials to bring it with par with the other districts of Khyber Pakhtunkhwa, hence needs the services of Competent Officers / Officials, therefore, Mr. Habib Ur Rehman, SPET has been adjusted as Physical Supervisor due to his competency, capabilities and being expert in the best interest of Education Department of District Orakzai.
4. That as stated under para-3, that the he was transferred from District Education Office due to his incompetency and negligence in his assignment, furthermore, the District Education Officer is the Competent Authority for posting / transfers from BS-1 to BS-16, Job Description and Competencies of District Education Officer attached as (**Annex-A**), it is pertinent to mention over here that the appellant is always involve leveling allegations /false

Rumors against the competent Authority and District Education Office Orakzai on social media (Copies attached as Annex-B). Furthermore, a complaint on Citizen Portal has been lodged against the appellant by all elders of Avi Mela Sheikhan Central Orakzai District, (copy attached **Annex-C**).

5. In reply to Para 5, it is submitted that departmental appeal dated 20/07/2020 of the appellant against the impugned order dated 02/06/2020 is badly time barred.

6. In reply to Para 6, it is stated that the appellant approach wrong forum by filing writ petition.

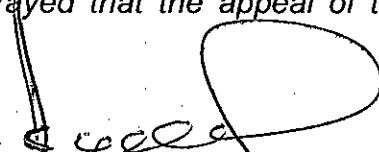
GROUND:

- A. Correct to the extent that he is resident of district Orakzai but he was incompetent for duties as Physical supervisor, furthermore a complaint on Citizen Portal has been lodged against the appellant by all elders of Avi Meal Sheikhan Central Orakzai District (copy attached as **Annex-C**). It is pertinent to mentioned over here that the appellant is always involve leveling allegations / false rumors against the competent Authority and District Education Office Orakzai on social media (copies attached **Annex-B**).
- B. That detail reply has already been submitted as para-3 above.
- C. Detail reply have been given in para 5 *ibid*.
- D. Incorrect and denied, detail reply has already been submitted above under para-3 on grounds , the respondent department has acted as per law/ policy and in the best interest of Education Department, District Orakzai.
- E. Incorrect and denied, detail reply has already been submitted above under para-3 on grounds and the respondent department has acted as per law / policy.
- F. Detail reply have been given in Para *ibid*.
- G. Incorrect and denied, no discrimination has been made to the appellant.

PRAYERS:

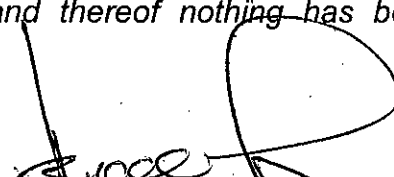
In the light of the above stated facts, it is humbly prayed that the appeal of the appellant may be ordered as dismissed with cost.

Respondent No. 3


District Education Officer
District Orakzai

AFFIDAVIT :

I the above respondent do hereby declare and affirm that the above comments are true and correct to the best of our knowledge and thereof nothing has been concealed from this Honorable Tribunal.


District Education Officer
District Orakzai

**District Education Office (Male)
Job Descriptions and Competencies**



Prepared by the Elementary and Secondary Education Department
Government of Khyber Pakhtunkhwa

November 2014

Collection and distribution of Free Text Books

Ensure collection and distribution of text books to all the government institutions in the district.

Other financial management responsibilities

1. Ensure preparation, reconciliation and submission of Statement of Expenditures (SOEs) and receipt statements to the Director E&SED on monthly basis and also ensure submission of quarterly and yearly statements.
2. Coordinate with C&W Department for the auction of damaged/dangerous buildings and disposal of unserviceable/redundant articles.
3. Ensure deposit of the sales proceeds in the government treasury.
4. Check and sign cases of investigation of arrear claims submitted by the DDEO, SDEOs as well as other DDOs as per rules.
5. Ensure provision of budget and payment of rent for buildings rented for official purposes after completion of the codal formalities and approval of the Competent Authority.
6. Ensure that sufficient budget is allocated for payment of utility bills for schools and offices, that payment is made, and that a record of payment is maintained.
7. Facilitate regular internal audits as per requirement.

B. Human Resource Management

Appointments

1. Act as chairperson of the Departmental Selection Committee for recruitment in BPS 1-15 and observe all the requisite formalities as per applicable rules.
2. Approve cases of appointments on merit and issue orders.
3. Observe quotas reserved for all categories.

Seniority Lists

1. Ensure prepare of seniority lists of all staff of the District Cadre and update the same once a year duly countersigned, preferably in the month of January each year.
2. Forward details/particulars of provincial cadre staff in the district to the Directorate of E&SED for inclusion in the relevant seniority lists.

Postings, transfers and promotions

1. Make postings and transfers of district cadre employees and submit proposals for transfer of the provincial cadre employees to the Director E&SED as specified below:
 - Make intra district transfers of office and school staff in BPS-1 to BPS-16 in accordance with the prescribed rules.
 - Prepare proposals for transfer of staff in grade 17 and above and submit the same to the Director E&SED.
2. Grant NOC for inter district/provincial transfers of staff and submit it to the Director E&SED for further action.
3. Prepare, process and finalize promotion cases of district cadre employees through the Department Promotion Committee (DPC).
4. Process and forward cases of the provincial cadre to the Directorate of E&SED for promotion.
5. Initiate cases of relaxation of upper age limits as per Government rules.

Grant of Leave

1. Grant leave to staff in BPS-1 to BPS-16, as per provisions contained in the Government of Khyber Pakhtunkhwa Revised Leave Rules 1981.
2. Prepare, scrutinize and submit leave cases of staff in BPS-17 and above to the Director



Syed Awan Ali Shah

جھوٹ بولنے والوں پر اللہ کی لعنت ہے ڈی ای او اور کزئی نے بڑے پیمانے پر کرپشن کر کے ضلع اور کزئی کے غریب نوجوانوں کی حقوق پر قبضہ کر کے کرفی کس سے 5 لاکھ سے لیکر تقریباً 10 لاکھ تک روپے ہڑپ کر لیے ہیں جنکی واضح ثبوت موجود ہیں انشاء اللہ بہت جلد ضلع اور کزئی کے ملگری استاذان کرپٹ ایجوکیشن آفیسر فرید اللہ اور مافیا گروپ کے خلاف تحریک کا آغاز کریں گے اور ضلع اور کزئی کے نوجوانوں کو اپنا حق دیکر کرپٹ مافیا اور دو نمبر طریقے سے آنے والے لوگ باہر پھینک دیں گے انشاء اللہ

Like Reply



Government of Khyber Pakhtunkhwa

DO Education (M), Orakzai

Complaint - Complaint Details

Complaint is In Process (since 3 Days, 1 months, 0 years)

Complaint Details

The citizen is: **Inland** View Complainant Logs

Complaint Subject: Absent from duty since 10 years

Mr.Syed Awan Ali Shah is absent from his official school duty since last 10 years....He has never been seen Avi Mela....He is running his stationary shop at Kohat....ADEO concerned support him....He is also using media instead of a Government teacher....He is also doing his politics in official matters.....inquiry has been requested otherwise we will register our complaint to Prime Minister, Chief Minister, Governor, Chief Secretary, Secretary Education, Director Education, DC Orakzai and DEO Orakzai..

Regards

All Elders of Avi Mela Sheikhan Central Orakzai

Address: All elders of Sheikhan Tribe Central Orakzai District

GPS Address: Hidden by Citizen

Complaint Attachments:

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR .

Service appeal No.13576/2020.

Syed Awan Ali ShahAppellant.

Versus

Secretary Education & others.....Respondents

Authority Letter

Mr. AsadUllah, Focal Person, Litigation District Orakzai, is authorized to submit comments on behalf of the Respondents in Service Appeal No.13576/2020 titled Syed Awan Ali Shah VS Secretary Education & Others.


**District Education Officer
District Orakzai**

ٹو:

ڈسٹرکٹ ایجوکیشن آفس اور کزنٹی۔

عنوان: درخواست بمبراد برائے مداخلت کام سرکار بمقام ڈسٹرکٹ ایجوکیشن آفس اور کزنٹی۔

نہایت مودبانہ گزارش کیجاتی ہے۔ کہ کافی عرصے سے سید اعوان علی شاہ نامی پی ای ٹی استاد آفس آ کر ہمیں ڈراتے اور دھمکاتے ہیں۔ سرکاری امور میں غیر ضروری مداخلت کرتا رہتا ہے۔ سوشل میڈیا پر ذاتی اور دفتری امور پر منفی پروپیگنڈے کر رہے ہیں۔ ہمیں شدید ذہنی ازیت پہنچ رہی ہیں۔ اس ذہنی کوفیت میں ہم بہتر انداز میں سرکاری امور سر انجام نہیں دے سکتے۔ وہ پچھلے کئی مہینوں سے مسلسل سکول کے بجائے دفتر ہمیں ذہنی کوفیت دینے آرہے ہیں۔

لہذا ہم جملہ ملازمین یہ پُر زور اپیل کرتے ہیں ہمیں اس ذہنی کوفیت سے بچائے اور انکو دفتر آنے پر پابندی کے ساتھ ساتھ اس پر کام سرکار میں مداخلت کا FIR بھی کٹوایا جائے ورنہ ہم کالم چوڑھڑتال کرنے پر مجبور ہیں۔ سرکاری امور کے سر انجام دہی میں حسب مجبوری دیر پر ہم معذرت ہوہے۔

جملہ ملازمین
ڈسٹرکٹ ایجوکیشن آفس، ضلع اور کزنٹی۔

① Iqbal Hussain
② Daulat Shah.
③ Shaka Ullah
④ Wahid Ullah
⑤ Akhbar Ahmad Khan.
Miss Nabeela
Nabeel Ullah
Kausar Ali
Kausar Ali
Mehar Dil
Rafiq
Rafiq

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

Service Appeal No.13576/2020

Syed Awan Ali Shah

Versus

Secretary Education and Others

Subject:-

**APPLICATION FOR VACATION OF STATUESQUE/SUSPENSION ORDER
DATED 30/11/2020 GRANTED BY THIS HONOURABLE TRIBUNAL IN THE
ABOVE MENTIONED APPEAL.**

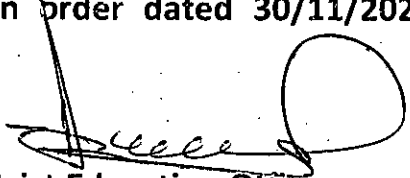
Respectfully Sheweth:-

1. That the above titled appeal is pending adjudication before this honourable service tribunal which is fixed for hearing today on 25/01/2021.
2. That the appellant filed the above mentioned service appeal against order dated 02/06/2020 in which this august tribunal granted statuesque/suspended the impugned order on 30/11/2020.
3. That it is pertinent to mention here that employee who has been transferred/adjusted vice the appellant has not been made party in the titled appeal, who is already took were charge against the said post and started performing his duty.

Prayer:

It is therefore most humbly prayed that on acceptance of this application statuesque/suspension order dated 30/11/2020 may kindly be recalled/vacated.

Respondent No.3


District Education Officer
District Orakzai

Before the Service Tribunal Peshawar

AWAN ALI SHAH V/S EDO HANGU etc

Applications for extension of Time
for depositing service charges etc

Respectfully Sheweth.

- ① That the captioned Appeal is pending before this Honorable Tribunal, which is fixed for today.
- ② That due to non connections with the client as the appellant is residing at Orakzai Agency/Distt, as there is no Telephonic facility available to inform the client.

It is therefore most humbly Prayed that time may kindly be extended for depositing Services Charges within three days before this Honorable court.

dated - 21/12/2020.

Through.

~~Applicant~~
Sajdar Iqbal
Advocate H.



DISTRICT EDUCATION OFFICE ORAKZAI

Phone & Fax No. 0925-690017

No. 3384 Date 25/09/2020

To,

The Head Master,
GMS Dana Khula, Orakzai

It is humbly requested that Mr. Habib Ur Rehman SPET will work in DEO office on need basis as focal person free text book and custodian/incharge of store, campus incharge/Physical Supervisor BISE Kohat in respect of this office till further order.

Therefore, it is requested that if deem so, he may be allowed, please.

Your cooperation in this regard will be highly appreciated.


DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Endst.No. 3384-85 /

Dated: 25 /09/2020

Copy for information to the:

1. DMO Orakzai.
2. Office copy.


DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

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

In re:

S.A.No.

Syed Awan Ali Shah.....Appellant

Versus

Secretary Education and othersRespondents

**REJOINDER ON BEHALF OF THE APPELLANT TO
THE PARA-WISE COMMENTS**

Sir,

PRELIMINARY OBJECTION

That the preliminary objections raised by the respondents in their para-wise comments are generate in nature, that as the appellant was appointed as Physical Education Teacher (PS-15) on 02.09.2005, and since then till date, he performing his duty regularly, punctually and no complaint has been registered since then till date, moreover on 02.06.2020, the respondent No.2, transferred the appellant from Govt. High School Avi Mela to the Office of District Education Officer District Orakzai, at Hangu, and he took over charge and started performing his duty.

ON FACTS

1. Para-1 & 2 of the para-wise comments need no reply.
2. Para-3 of the para-wise comments is correct to the extent that on 02.06.2020, the appellant was transferred from GHS Awi Mala to the office of the District Education Officer, Orakzai at Hangu and rest of the para is totally incorrect, baseless hence denied; Furthermore, that the appellant served more than 15 years in the Education Department and during this period no complaint has been lodged against the appellant regarding his incompetency, any irregularities, or discharging his official duty. It is important to note that after his transfer to the office of DEO, the appellant took over charge and continued his duty in the said office, but after laps of one month on 02.07.2020 with due malafide intention, the respondent No.2 with the direction of the respondent No.3, under political influence and upon personal grudges, the appellant was again transferred to GHS Awi Mela with due malafide intention, jut to harass the appellant.
3. Para-4 of the para-wise comments is totally wrong, incorrect, hence denied. That as stated above the appellant served more than 15 years and during this period no complaints has been registered against him. In fact the respondent No.3/ DEO and his officials were busy in the illegal appointments on the basis of bribe (money), from the eligible candidates upon their appointment in

this respect proper FIR is registered by the Anti-Corruption Department.

4. In response to the remaining paras, a detail replies given in the above paras.
5. Para-8 need no comments.

GROUND

In response to grounds A to G, it is humbly submitted that proper replies given in the above paras.

PRAYER

It is, therefore, prayed that on acceptance of this rejoinder the para-wise comments may kindly be rejected and appeal of the appellant may kindly be accepted.

Appellant
Through


Safdar Iqbal Khattak
Advocate
Supreme Court of Pakistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL..

PESHAWAR

C.M.No. _____/2021

IN

S.A.No.13576/2020

Syed Awan Ali Shah Appellant

Versus

Director Elementary & Secondary Education & others..... Respondents

APPLICATION FOR RELEASE OF SALARY
OF APPELLANT FOR THE MONTH OF
MARCH, APRIL AND MAY, 2021.

Humbly Sheweth;

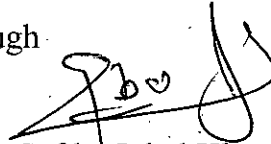
- 1) That the applicant filed an appeal which is pending before this Hon'ble Tribunal and is fixed for today i.e. 03.06.2021.
- 2) That further to elaborate that in the instant appeal the applicant has challenged his transfer order dated 02.07.2020 and vide order dated 30.11.2020, this Hon'ble Tribunal suspended his transfer order dated 02.07.2020.
- 3) That the applicant while performing his official duties in the office of the respondent No.2, till 09.12.2020 but on 10.12.2020 the appellant was stopped by the respondent No.2 from his official duty and used very harsh and abusive language and started threatening for dire consequences if he again entered in this office, in this respect the applicant has already been filed a contempt of court petition against the respondent No.2, which is pending in this Hon'ble Tribunal.

- 4) That after now from the month of March, 2021 the respondent No.2 stopped his salary without any justified and legal reason.

It is, therefore, humbly prayed that on acceptance of this application, the salary stopped by the respondents No.1 and 2 may kindly be released.

Appellant

Through



Safdar Iqbal Khattak
Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,,

PESHAWAR

C.M.No. _____/2021

IN

S.A.No. _____/2020

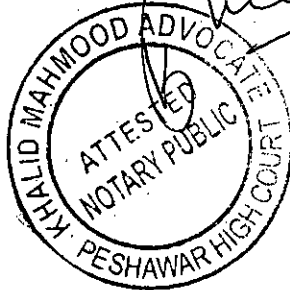
Syed Awan Ali Shah Appellant

Versus

Director Elementary & Secondary Education & others..... Respondents

AFFIDAVIT

I, Syed Awan Ali Shah son of Syed Zamin Jan R/o Lower Orakzai, District Orakzai (appellant) do hereby affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



3-6-21
Deponent
CNIC No.21603-9663268-7

3/6/2021

BEFORE THE KHYBER SERVICE TRIBUNAL PESHAWAR

Syed Awan Ali Shahv/s..... Govt. of KP and others

APPLICATION FOR ADJOURNMENT

Respectfully Sheweth:-

1. That the above titled appeal is pending before this Hon'ble TRIBUNAL Tribunal and is fixed for today i.e. 25.06.2021.
2. That the counsel for the appellant is busy in BBA petition of the appellant and others in the court of learned Additional Sessions Judge, Kohat and is unable to attend this Hon'ble Tribunal

Therefore, it is requested that the titled appeal may kindly be adjourned to any other date convenient to this Hon'ble Tribunal.



Safdar Iqbal Khattak
Advocate High Court

Dated: 25.06.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M.NO. _____/2021

IN

APPEAL NO. 13576/2020

Syed Awan Ali Shah

VS

Education Department

APPLICATION FOR IMPLEADMENT OF THE
APPLICANT AS PARTY/PRIVATE RESPONDENT IN
THE ARRAY OF RESPONDENTS IN THE ABOVE
TITLED APPEAL

R/SHEWETH:

- 1- That the above mentioned appeal is pending adjudication before this august Tribunal in which 28.9.2021 date is fixed for hearing.
- 2- That the above mentioned appeal is pending adjudication before this august Service Tribunal against the office order dated 2.7.2020 whereby the transfer order dated 2.6.2020 has been cancelled. Copy attached as annexure **A.**
- 3- That as valuable rights of the below noted applicant is attached to the instant appeal, therefore it is essential that the below noted applicant be impleaded as private respondents in the above mentioned appeal.
- 4- That propriety, fair play and justice demands that the below noted applicant be impleaded as party/ private respondents in the abovementioned appeal.

It is therefore most humbly prayed that on acceptance of this impleadment application the below noted applicant may very kindly be impleaded as party/ private respondents in the above mentioned appeal.

APPLICANT

Habib ur Rehman
HABIB UR REHMAN

THROUGH:

Noor Mohammad Khattak
NOOR MOHAMMAD KHATTAK
ADVOCATE

*No objection on
the appeal of 9/10/21
of impleadment
of the applicant*

2

ADDRESS OF APPLICANT:

Mr. Habib Ur Rehman, Senior Physical Education Teacher (BPS-16),
O/O the District Education Officer, District Orakzai.

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR
Ph No. 091-921039, 9210838

Notification:

The transfer of the following SPETs are hereby ordered with effect from the date of their taking over charge in the school/office as noted against each in the interest of public service.

S.No.	Name of SPET	Present Place of posting	Transfer to	Remarks
1.	Habib Rehman	District Education Office Orakzai	GHS Awi Mela District Orakzai	Vice S.No. 2
2.	S. Awan Ali Shah	GHS Awi Mela District Orakzai	District Education Office Orakzai	Vice-S.No. 1

Note:

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

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endost No. _____ dated Peshawar the 02/06/2020

Copy forwarded for information and necessary action to the:

1. District Education officer Orakzai
2. District Accounts officer Orakzai
3. Head Master GHS Awai Mela Orakzai
4. PA to Director Elementary And Secretary education Peshawar
5. Master File.

Deputy Director

[Signature]
ATTESTED



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210339, 9210938

091-9210437, 9210957, 9210458

Fax 091-9210936

Notification

The transfer of the following SPETs are hereby ordered with effect from the date of their taking over charge in the school/Office as noted against each in the interest of public service.

S.NO.	NAME OF SPET	Present place of posting	Transfer to	Remarks
1	Muhammad Uzair Khan	District Education office Orakzai	GHS-Awi Mela District Orakzai	Vice S.No.2
	Amir Ali Khan SPET	GHS-Awi Mela District Orakzai	District Education office Orakzai	Vice S.No.1

Note

Change report should be submitted to all concerned.
No TA/DA is allowed.

*Attested copy to
1 case copy*
ATTESTED

DIRECTOR

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Dated Peshawar the 17/07/2020

Director Education Officer Orakzai

Deputy Director

VAKALATNAMA

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO _____ OF 2021

Syed Awan Ali Shah

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Implementation Private Respondent (Habib-Ur-Rehman)
Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK, Advocate, HIGH COURT, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2021

Habib-Ur-Rehman
CLIENT

ACCEPTED
NOOR MUHAMMAD KHATTAK
KAMRAN KHAN

SAYED KHAN
UMAR FAROOQ MOHMAND
& **HAIDER KHAN**
ADVOCATE

OFFICE:
Flat No.4, 2ND Floor,
Juma Khan plaza near
FATA secretariat, warsak road
Peshawar City.
Mobile No.0345-9383141

Before The KP Service Tribunal, Pesh:

Service Appeal No. 13576/2020

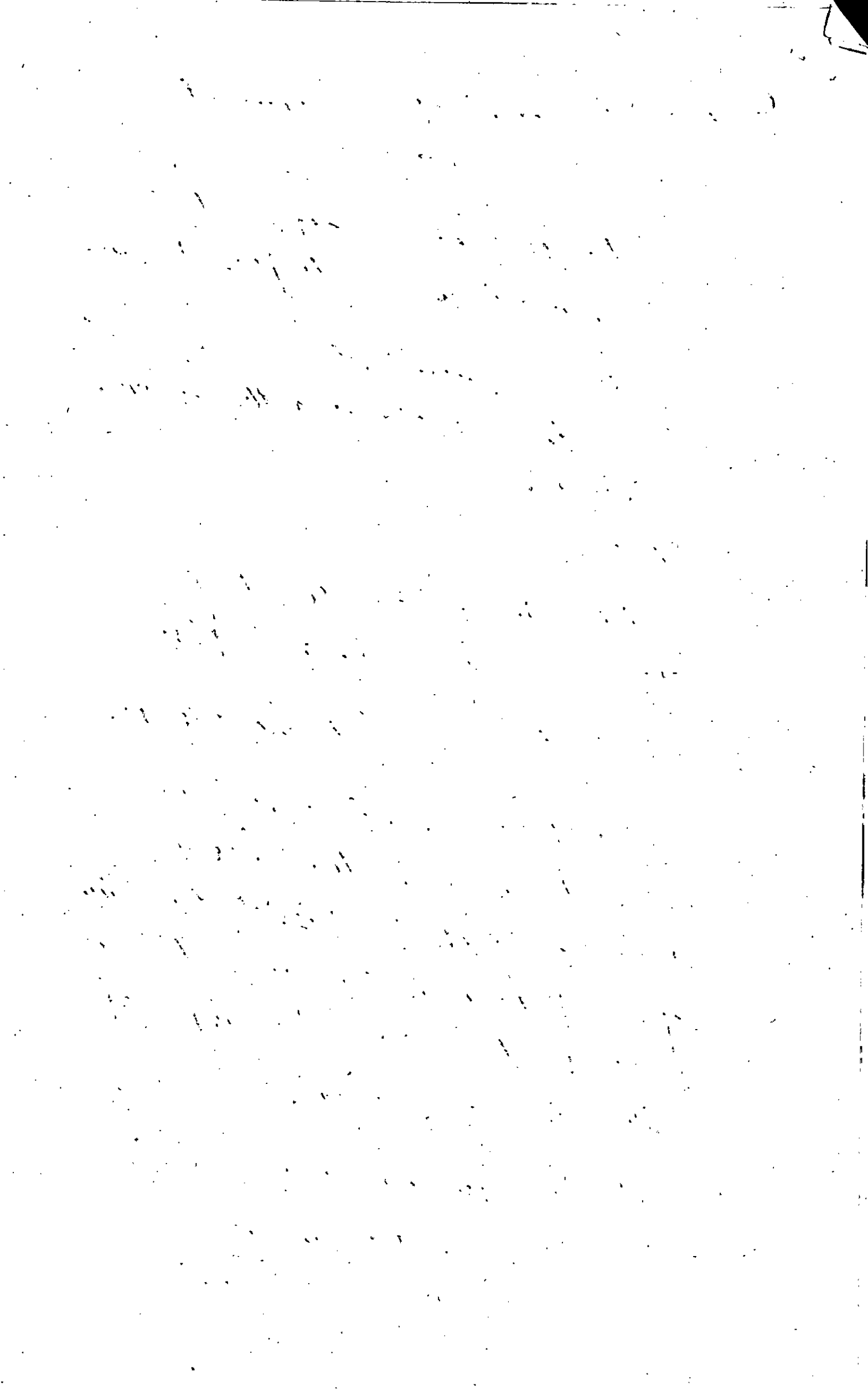
Syed Awan Ali Shah — Appellant
V/S

Secretary Education & Others — Respondents

Reply on Behalf of Respondent No. 5
(Mr. Habib-ur-Rehman)

Preliminary Objection:

- 1) That the appellant has got no Cause of Action to file the instant Service Appeal.
- 2) That the appellant has got no Cause of action to file the instant appeal for cancellation of transfer order hence the appellant has no locus standi.
- 3) That the appellant has not come to this Honourable Tribunal with clean hands.
- 4) That appellant is estopped by his own conduct to file the instant appeal.



DEO (Orakzai) as well as Complaints were also received against the appellant.

5) Incorrect, hence denied as the appellant has filed Departmental appeal on 20.07.2020 but did not wait for its outcome and filed the Service Appeal prematurely.

6) Incorrect, the appellant has approached wrong forum just to get and pressurize the authorities.

ON GROUNDS:

A. Incorrect hence denied as absence complaint is received against the appellant.

B. Incorrect the appellant has been transferred from his post due to incompetency.

- C) Incorrect the appellant did not wait for 90 days as the appeal is filed the Service Appeal prematurely.
- D) Incorrect hence denied as it is just an allegation.
- E) Incorrect hence denied.
- F) Incorrect no violation has been made by respondent.
- G. Incorrect no discrimination has been made in the case of the appellant.

It is, therefore, most humbly prayed that on acceptance of the instant reply the appeal of the appellant may kindly be declared to be devoid of merit and dismissed with cost.

Appellant/Resp: 5
Through
Noor Mohammad Khattak
VASC

Note:
As per instruction the
contents of the reply
are true and correct.



**INQUIRY REPORT OF MR. AWAN ALI SHAH, SPET BS-16, GHS, AVI MELA,
DISTRICT ORAKZAI**

In compliance with Notification No. 16773-76/A-12/1st AE/Enquiry File/Pakka Cover, the undersigned visited District Education Office, District Orakzai on 27-12-2021, in order to probe into the matter mentioned in the letter No. 9329 dated: 14-12-2021, by DEO Orakzai.

BACKGROUND OF THE CASE:-

Syed Awan Ali Shah SPET was transferred from GHS, Avi Mela, District Orakzai to District Education Office, District Orakzai vide No. 60-64 dated Peshawar the 02-06-2020 by Directorate of E&SE Khyber Pakhtunkhwa Peshawar (ANNEX-A). This notification was withdrawn by Directorate of E&SE Khyber Pakhtunkhwa Peshawar vide No. 887-92/A-12/E-7 dated: 02-07-2020 (ANNEX-B). Syed Awan Ali Shah SPET took over charge in GHS Avi Mela, District Orakzai as per Teacher Attendance Register (ANNEX-C). He performed his duties there in the school till the decision of his appeal on 30-11-2020 filed on 10-09-2020 before the Khyber Pakhtunkhwa Service Tribunal Peshawar. The decision states that "In the meanwhile the operation of the impugned notification bearing Endorsement No. 887-92/A-12/E-7 dated 02-07-2020 SHALL REMAIN SUSPENDED IF NOT ALREADY ACTED UPON TILL THE DATE FIXED" (ANNEX-D).

PROCEEDINGS:-

A complaint by the elders (Unknown) of the village was received to the office of DEO, District Orakzai on 21-12-2020 about the absence of Syed Awan Ali Shah SPET and his side business (ANNEX-E). DEO, District Orakzai issued him SHOW CAUSE NOTICE vide No. 6816 dated 21-12-2020 (ANNEX-F). The DEO, District Orakzai then issued him another SHOW CAUSE NOTICE vide No. 115-A dated 10-02-2021 (ANNEX-Fa). Syed Awan Ali Shah SPET didn't respond to any of the SHOW CAUSE NOTICE rather he started defamation campaign against DEO and other Officers of the DEO Office, District Orakzai through Social Media (ANNEX-Fb). Then Four Circle ADEOs namely Raees Khan, Abdul Malik, Iqbal Hussain and Daulat Shah complained against Syed Awan Ali Shah SPET about his misconduct and unlawful interference in the office matters (ANNEX-Fc). On 02-03-2021, Syed Awan Ali Shah SPET once again visited the office of the DEO with weapons and threatened DEO, DEO, District Orakzai then wrote a letter vide No. 1491-94 dated: 02-03-2021 to District Police Officer, District Orakzai to lodge a FIR against Syed Awan Ali Shah SPET (ANNEX-G). A copy of the same was forwarded to Deputy Commissioner, District Orakzai. Deputy Commissioner, District Orakzai vide No. 377/C/DC-ork dated 3-3-2021 surrounded services of Syed Awan Ali Shah SPET to E&SED and recommended inquiry into the matter (ANNEX-H). DC directed sternly to District Account Officer, District Orakzai for Stoppage of his Salary in intimation to the Deputy Commissioner Office, District Orakzai. Then FIR No. 174 dated 20-5-2021 was chalked out against Syed Awan Ali Shah SPET on the report of Mehboob Khan S/O Muhammad Akbar (ANNEX-I). Superintendent of Police Investigation, vide No. 1856/GC dated Kohat the 01-6-2021 informed DEO, District Orakzai and to take Departmental action against Syed Awan Ali Shah SPET (ANNEX-J). During visit to the office of the DEO, District Orakzai the undersigned called Syed Awan Ali Shah SPET time and again but he didn't respond. Then the undersigned sent him Text Message to attend the office but he didn't respond. After one week he informed the undersigned through Text Message that he will come to the office of the undersigned within three days but he didn't come. Syed Awan Ali Shah SPET came to the office of the undersigned on 12-1-2022 and I served upon him a questionnaire (ANNEX-K). He requested for some time to respond but still I am waiting for his response. Some elders submitted joint statement about the absence and misconduct of Syed Awan Ali Shah SPET (ANNEX-L).


FINDINGS:-

- i. Syed Awan Ali Shah SPET was transferred to DEO Office on 2-6-2020 by Directorate of E&SE Khyber Pakhtunkhwa Peshawar but the same notification was cancelled on 2-7-2020 by the competent authority.
- ii. Syed Awan Ali Shah SPET filed appeal on 10-9-2020 before the Khyber Pakhtunkhwa Service Tribunal against notification No. 887-92/A-12/E-7 dated 2-7-2020.
- iii. Khyber Pakhtunkhwa Service Tribunal in its order dated 30-11-2020 decided that "In the meanwhile the operation of the impugned notification bearing Endorsement No. 887-92/A-12/E-7 dated 02-07-2020 SHALL REMAIN SUSPENDED IF NOT ALREADY ACTED UPON TILL THE DATE FIXED".
- iv. The same order was wrongly interpreted by Syed Awan Ali Shah SPET and he interpreted it as a "Status Quo".

RECOMMENDATIONS:-

- i. As the Khyber Pakhtunkhwa Service Tribunal orders were wrongly interpreted by the employee concerned so his absence period may be considered as leave without pay.
- ii. He may be transferred to another Newly Merged District.
- iii. Social Media Campaign by him against DEO, District Orakzai may be forwarded to FIA Cyber Crime Wing and in the light of that report he may be treated under E&D rules 2011.
- iv. As the case is subjudice, so all the above recommendations may be implemented after decision of the case.

Dated: 18/03/2022


WAJEEH UDDIN AHMAD
DEPUTY DIRECTOR/INQUIRY OFFICER
DIRECTORATE OF EDUCATION, PESHAWAR

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210958,
091-9210437, 9210957, 9210468
Fax 091-9210936

(S.O.)

Initial Transfer
order of physics

The transfer of the following SPETs are hereby ordered with effect from the date
after taking over charge in the school/Office as noted against each in the interest of public.

S.No.	NAME of SPET	Present place of posting	Transfer to	Remarks
1	Mr. Habib Ur Rehman	District Education office Orakzai	GHS Awi Mela District Orakzai	Vice S.No.2
2	S Awan Ali Saah SPET	GHS: Aw Mela District Orakzai	District Education office Orakzai	Vice S.No.1

Note

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

DIRECTOR
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Dated Peshawar the 2/6/2020

Endst.No. 114/FHO F-7/RC Orakzai

Copy forwarded for information and necessary action to the:

1. District Education Officer Orakzai.
2. District Accounts Officer Orakzai
3. Head Master GHS Awi Mela Orakzai
4. P. A to Director Elementary and Secondary Education Peshawar
5. Master file

Deputy Director (ESU)

میزان

دستخط ہیڈ ماسٹر

DIR

OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR.

Cancel/late

Notification

Consequent upon the approval of the competent authority, the transfer notification in respect of Mr. Habib Ur Rehman SPET and Mr. Syed Awan Ali Shah PET issued vide this Directorate under Endorsement No. 60-64 dated 2-06-2020, is hereby withdrawn in the interest of public service with immediate effect.

Furthermore the services of Mr. Habib Ur Rehman SPET are hereby placed at the disposal of DEO Orakzai for further posting against the vacant post of SPET.

Compliance report should be sent to all concerned.

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

Indst. No. 887-92 /A-12/ E-7

Dated Peshawar: the 2/7/2020

Copy forwarded to the:-

- 1 District Education Officers District Orakzai.
- 2 District Accounts Officers District Orakzai.
- 3 Headmaster concerned.
- 4 Teachers concerned.
- 5 PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 6 P/Files.

[Signature]
Deputy Director (Esab)
Merged Districts

میران

دستخط ہیڈ ماسٹر

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210189, 9210938,
091-9210437, 9210957, 9210468
Fax 091-9210938

(50)

Initial Transfer
Order of Principals

The transfer of the following SPETs are hereby ordered with effect from the date
they taking over charge in the school/OFFICE as noted against each in the interest of public.

S.NO.	NAME of SPET	Present place of posting	Transfer to	Remarks
1	Mr. Habib Ur Rehman	District Education office Orakzai	GHS Awi Mela District Orakzai	Vice S.No.2
2	S Awan Ali Shah SPET	GHS Awi Mela District Orakzai	District Education office Orakzai	Vice S.No.1

Note

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

DIRECTOR
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Dated Peshawar the 2/6/2020.

Encls. No. 1/1/1/PHO F-7/100 Orakzai

Copy forwarded for information and necessary action to the:

1. District Education Officer Orakzai.
2. District Accounts Officer Orakzai
3. Head Master GHS Awi Mela Orakzai
4. P & O Director Elementary and Secondary Education Peshawar
5. Master file

Deputy Director (ESSE)

میزان

دستخط میڈان

DIRL

OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR.

Cancel/Last

Notification

Consequent upon the approval of the competent authority, the transfer notification in respect of Mr. Habib Ur Rehman SPET and Mr. Syed Awan Ali Shah PET issued vide this Directorate under Endorsement No. 60-64 dated 2-06-2020, is hereby withdrawn in the interest of public service with immediate effect.

Furthermore the services of Mr. Habib Ur Rehman SPET are hereby placed at the disposal of DEO Orakzai for further posting against the vacant post of SPET.

Compliance report should be sent to all concerned.

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

Enclst: No. 887-92 /A-12/DE-7

Dated Peshawar: the 2/7 2020

Copy forwarded to the:-

- 1 District Education Officers District Orakzai.
- 2 District Accounts Officers District Orakzai.
- 3 Headmaster concerned.
- 4 Teachers concerned.
- 5 PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 6 P/Files.

[Signature]
Deputy Director (Estab)
Merged Districts

میران

دستخط ایڈمنسٹریٹر

رجسٹر حاضری مند رسید

بابت ماہ		الست		توزیر		امداد الرحمن		امداد الرحمن	
نام		الست		توزیر		امداد الرحمن		امداد الرحمن	
عمدہ		S.C.T		S.C.T		S.C.T		S.C.T	
تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
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سہولت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقية									
امتحان									
بیماری									
میزان									

دستخط ایڈمنسٹریٹر

رجسٹر حاضری مڈرسین

بابت ماہ		نام		عہدہ	
اپریل		SNOOPAY		SNOOPAY	
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تاریخ	آمد	دستخط	رواگی	دستخط	آمد
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تہہ	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
ثقافت									
اشتیاق									
بیماری									
میزان									

دستخط ہیڈ ماسٹر

رجسٹر حاضری مدد رسیدین

بابت ماہ

اکتوبر

گورنمنٹ ہائی اسکول اور ایف ایچ ایف

نام ایچوان علی شاہ

عہدہ سرکاری عہدیدار

قاری محمد علی

P.E.T

H.T

تاریخ	آمد	دستخط رواگی	دستخط آمد	دستخط رواگی	دستخط آمد	دستخط رواگی	دستخط آمد	دستخط رواگی	دستخط آمد
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قتال										
بی										
ان										

دستخط ایڈ ماسٹر

رجسٹر حاضری مدد رسیدین										
بابت نام										
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عہدہ										
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تاریخ	آمد دستخط	رواگی دستخط	آمد دستخط	رواگی دستخط	آمد دستخط	رواگی دستخط	آمد دستخط	رواگی دستخط	آمد دستخط	رواگی دستخط
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تعداد	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال
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استحقاق										
پیمائی										
میزان										

دستخط ہیڈ ماسٹر

رجسٹر حاضری مڈرسین

بابت ماہ

السنہ

۲۰۱۵

صبر آمان

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تاریخ	آمد	دستخط روانگی	دستخط آمد	دستخط روانگی	دستخط آمد	دستخط روانگی	دستخط آمد	دستخط روانگی
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نہضت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
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استحقاقی									
بیماری									
میزان									

دستخط ہیڈ ماسٹر

9

رجسٹر حاضری مڈ رسین میراٹری کینس اور دیگر بیوروں کے لیے

بابت ماہ		نام عزیز		عہدہ		تاریخ	
الست		دستخط		T.T		آمد دستخط	
آمد دستخط	رواگی دستخط	آمد دستخط	رواگی دستخط	آمد دستخط	رواگی دستخط	آمد دستخط	رواگی دستخط
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تہہ	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
تہہ												
اتفاقہ												
استحقاق												
پیمائی												
میزان												

دستخط ہیڈ ماسٹر

THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR



13576
S.A. No. _____/2020

Khyber Pakhtunkhwa
Services Tribunal
Case No. 10072
Dated 10/9/2020

Syed Awan Ali Shah son of Syed Zamin Jan
R/o caste Bar Muhammad Khel, Tapa Baba Nawasi
Kharki, P.O. Kurez, Tehsil Lower District Orakzai
.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat, Peshawar.
 2. Director Elementary and Secondary Education, near GHSS No.1, G.T. Road, Peshawar.
 3. District Education Officer, Orakzai at Hangu
 4. Deputy Director (Est'b) Merged Districts
- Respondents

RECEIVED
KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL
PESHAWAR

RECEIVED
KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL
PESHAWAR

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974.

RESPECTFULLY SHEWETH:-

Filed to-day
10/9/2020
Re-submitted to-day
and filed.

Registrar
3/11/2020

1. That appellant was initially appointed as Physical Education Teacher (BPS-15) on 02.09.2005 in G.M.S. Avimela District Orakzai. (Copy of appointment order is attached as Annexure "A").
2. That on 10.02.2020 the appellant submitted an application to the respondent No.2 for his transfer from GHS Avimela to the office of District Education Officer,

خدمت جناب ڈائریکٹر ایلمینٹری اینڈ سینڈری ایجوکیشن خیبر پختونخواہ پشاور۔

جناب عالی! گزارش کرتے ہیں کہ اپنی توجہ ایک اہم مسئلے کی طرف مبذول کرانا چاہتا ہوں۔ کہ عوان علی شاہ PET گورنمنٹ ہائی سکول اور کڑئی میں عرصہ دراز سے تعینات ہے۔

لیکن اس نے جب سے چارج لیا ہے تب سے تیسرا دن تک اس نے ایک دن بھی ڈیوٹی نہیں کی ہے اور اس نے وہ دن بھی پورے دنوں شروع کیا ہے اور ساتھ ہی سیشنری کا دورہ کان بھی خدو ہے۔ جس نے ہمارے بچوں کو پڑھانے کا قیمتی وقت اپنے کو دور سے ضائع کر دیا ہے۔ اور ہم جملہ مکانات نے کئی بار سابقہ ڈی ای اوز ابد اللہ شاہ صاحب کو بھی شکایت کیا تھا لیکن بد قسمت سے وہ یہ رہنویا اور رو بہا کر گیا۔ لیکن مذکورہ شخص جب سے بھرتی ہوا ہے ایک دن بھی ڈیوٹی نہیں کی۔ اور حرام تو ہیں ایسے سے یہ ہمارے بچوں کے حقوق پر نااہل ہے اور ہمارے بچوں کا مستقبل تباہ و برباد ہو رہا ہے۔

لہذا آپ صاحبان سے گزارش ہے کہ اس کے خلاف ایک نوٹس کی جائے اور جتنے حرام شیوا ہیں لئے ہیں انکی رٹورن کی جائے اور سٹریکٹ سے کھڑی سزا دی جائے تاکہ دوسروں کیلئے نشان عبرت بن جائے۔ شکریہ۔
العارضین۔

جملہ شران و کشران گاؤں آوی سیہ قومہ مشین شمع اور شونی

پین برائے اظہار و ضروری کارروائی۔

1۔ مس آف ایجوکیشن خیبر پختونخواہ پشاور۔

2۔ ڈائریکٹ ایجوکیشن آفیسر ڈسٹرکٹ اور کڑئی۔

3۔ ڈائریکٹر (NAB) نیشنل اکاؤنٹبلیٹی خیبر پختونخواہ پشاور۔

4۔ بریکڈرائر کڑئی۔ کاؤٹ گلجو۔

5۔ ڈپٹی کمیشنر ڈسٹرکٹ اور کڑئی ہنگو۔

30.11.2020

Appellant in person alongwith Mr. Safdar Iqbal Khattak, Advocate, are present.

Learned counsel for the appellant contends that the transfer order made on 02.06.2020 was later on withdrawn by virtue of notification dated 02.07.2020 which is contrary to the posting transfer policy as in vogue in the province however, since the post is still vacant, therefore, neither he has relinquished the charge nor he has been relieved there from and he stressed that the order so made was the result of extraneous pressure emanating from a political figure/office holder, calling in question the very order in the departmental appeal but it proved ineffective thus paving way for the instant service appeal.

The points so agitated at the bar needs consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 21.01.2021 before S.B.

In the meanwhile the operation of the impugned notification bearing endorsement No. 887-92/A-12/E-7 dated 02.07.2020 shall remain suspended if not already acted upon till the date fixed.

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

Signature copy

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of ...	30-11-20
Name of ...	8007
Case No.	10-
Urgency	4-
Time	14-0
Name of ...	A
Date of ...	30-11-20



DISTRICT EDUCATION OFFICE ORAKZAI

Phone No. 0925-690017

No.

12/10

Dated: 21/12/2020

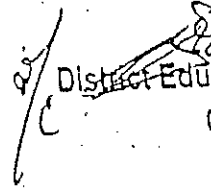
To,

Mr. Awan Ali Shah,
PET, GHS Avi Mela, Central, Orakzai.

Subject: - SHOW CAUSE NOTICE

It is noticed that you are found absent from official duty for a long time without prior intimation.

Therefore, you are directed to explain your position in writing within three working days until (25-12-2020) positively otherwise disciplinary action will be taken against you under the E & D rules.


District Education Officer,
Orakzai

Copy forwarded to the following for information:-

1. Director (E & SE), Directorate of Education, Peshawar.
2. Deputy Commissioner, District Orakzai.
3. District Monitoring Officer, Orakzai.

District Education Officer,
Orakzai



OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Phone No. 0925-690017

No. 116.A.2011/10102/2021 Dated: 10.1.22/2021

To,

Syed Awan Ali Shah,
SPET GHS Avi Meia, Orakzai.

Subject: - SHOW CAUSE.

You are hereby intimated that you have lodged an application against the undersigned along with other ADEOs, ASDEOs and officials of this office clearly violating the E&D Rules 2011.

Instead of having all the appropriate quarters, you have escaped all the obligatory SOPs by loading an FIR against the dignities of this office. Hence, your actions are totally against the E&D Rules 2011.

In view of the aforesaid facts, you are directed to explain your positions as to why disciplinary action against you should not be taken under E&D Rules 2011. Your reply should reach this office within three days positively, failing which, it will be presumed that you have no defense against the above mentioned charges.


DISTRICT EDUCATION OFFICER,
ORAKZAI

Enclst No. 116.A.2011/10102/2021 Dated 10.1.22/2021

Copy to the following:-

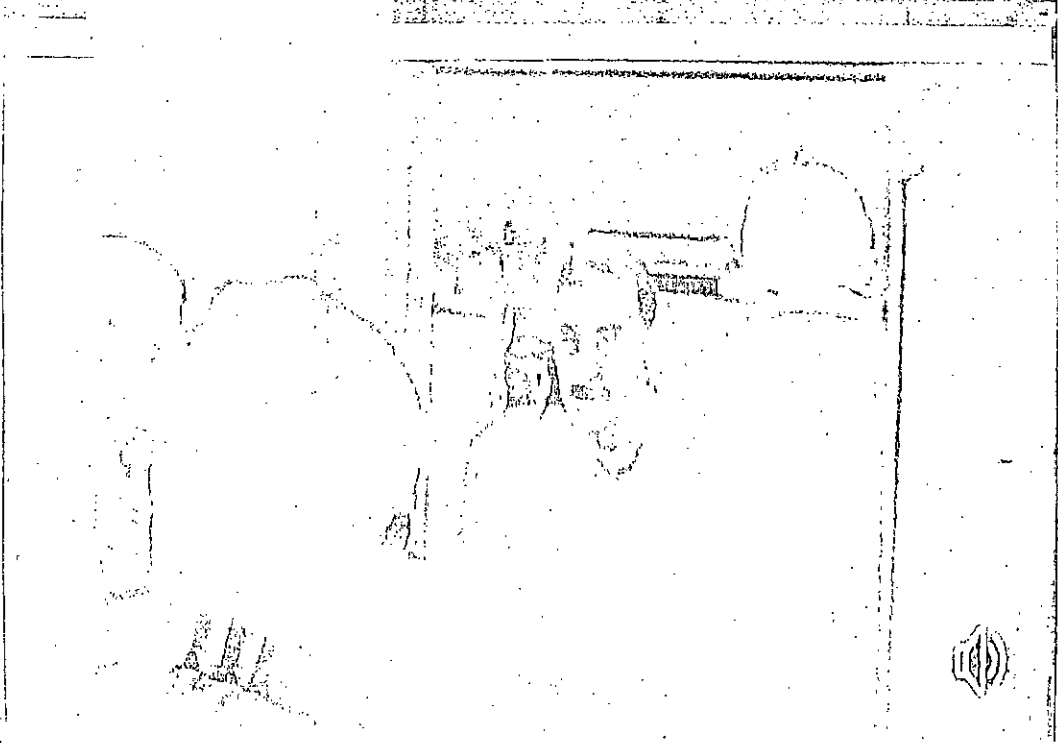
- 1) Director NMDs, Elementary & Secondary Education, Peshawar.
- 2) Deputy Commissioner, Orakzai.
- 3) District Monitoring Officer, Orakzai.
- 4) District Account Officer, Orakzai.
- 5) Office Copy.


DISTRICT EDUCATION OFFICER,
ORAKZAI

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ضلع اورکزئی کے محکمہ تعلیم کے اساتذہ کی حالیہ بھرتی میں تحریک انصاف کے انصافی حکومت میں میوٹ کی جھوٹے دعوے دھرے کے دھرے رہ گئے ضلع اورکزئی کے محکمہ تعلیم کے حالیہ اساتذہ بھرتی میں کرپٹ ڈسٹرکٹ ایجوکیشن آفیسر فرید اللہ اور اساتذہ سلیکشن کمیٹی کے چیئرمین اقبال خان کرپٹ سیاسی مداری کی ملی بھگت سے اورکزئی کے محکمہ تعلیم کے ہاسٹل میں قبضہ جما کر اساتذہ کی بھرتی میں لاکھوں کی بولیاں لگا کر کروڑوں کے گھیلے کر کے ضلع اورکزئی کے تعلیمی میدان کو ویران کر دیا ضلع کے کرپٹ ڈسٹرکٹ ایجوکیشن آفیسر فرید اللہ نے اور سیاسی مداری کی ملی بھگت سے ضلع اورکزئی کے غریب عوام کے نوجوانوں کی حقوق پر ڈاکہ ڈال کر اورکزئی نوجوانوں کی بجائے ضلع کوہاٹ بنگو ضلع کزک کے مافیا نے میدان مار لیا ایجوکیشن کے کرپٹ افسران نے ضلع اورکزئی کے 50 سے زائد خالی پوسٹوں جو ایٹا میں دیے گئے تھے چوری کر کے آئے روز ایک ایک پوسٹ پر بولی لگا کر 5 لاکھ سے لیکر 10 لاکھ روپے تک فروخت کرتے رہے اس دوران انٹی کرپشن کے اسسٹنٹ ڈائریکٹر سپیشل ونگ نے اورکزئی کے تاریخ میں پہلی بار ایجوکیشن آفس میں چھاپہ مار کر ڈسٹرکٹ ایجوکیشن آفیسر فرید اللہ کو رنگے ہاتھوں گرفتار کیا جو کہ تصویر میں واضح دیکھائی دے رہا ہے اور یہ بھی یاد رہے کہ مافیا نیٹ ورک نے انٹی کرپشن ڈائریکٹر چھاپہ کے باوجود ضلع اورکزئی کے ایجوکیشن ہاسٹل میں پھر سے بیٹھ کر کرپشن کا بازار گرم کر رکھا ہے اور آئے روز فی آرڈر 5 لاکھ سے لیکر 10 لاکھ تک فروخت کرنے کا یہ سلسلہ نہ روسکا ملگری استاذان ضلع اورکزئی کی حالیہ اساتذہ بھرتی میں مافیا نیٹ ورک کے مختلف ایجنٹوں کے ذریعے تقسیم کرنے والی رشوت دہنے والوں کو پرزور اپیل کر کے خبردار کرتے ہیں کہ وہ اپنی رشوت مختلف ایجنٹوں کے ذریعے تقسیم کرنے والے مافیا سے واپس کرے ورنہ یہ رشوت آپ کے کام نہیں آئیگی اور دو نمبر طریقے سے آنے والے امیدواروں جنہوں نے ضلع اورکزئی کے نوجوانوں کی حقوق چھین کر اورکزئی کے نوجوانوں کی حقوق پر قبضہ ڈالا ہے معاف نہیں کیا جائے گا بلکہ ان مافیا کو محکمہ تعلیم سے باہر پھینک دیا جائے گا انشاء اللہ آخر میں ملگری استاذان نے کوہاٹ میں ایک ہنگامی میٹنگ ہونی جس میں ملگری استاذان نے ضلع اورکزئی کے سوشل میڈیا اورکزئی کے پریس میڈیا نوجوانوں عوامی نیشنل پارٹی کے چیئرمین مٹل خان اورکزئی شیخان ویلفیئر سوسائٹی اورکزئی یوتھ آرگنائزیشن اور حالیہ اساتذہ کی متاثر امیدواروں سے مطالبہ کیا ہے کہ وہ ملگری استاذان ضلع اورکزئی کے ان کرپٹ عناصر کے خلاف اٹھ کر مافیا کے کرپشن کو بے نقاب کرنے میں ساتھ دیجئے مافیا کو بہت جلد انشاء اللہ قانون اور آئین کے کٹھرے میں لائے نگے اور بہت جلد بے نقاب کریں گے اور یہ بھی یاد رہے کہ اگر ملگری استاذان کے کسی ایک کارکن یا رشتہ دار کا ایک بال بھی ضائع ہوا تو تمام تر ذمہ داری کرپٹ چور مداری اور مافیا گروپ ایکس وائی زیڈ پر عائد کی جائے گی اردے جن کے پختہ ہوں نظر جن کی خدا پر ہوں۔ طلاطم خیزوں موجوں سے وہ گھبراہٹ نہیں کرتے انشاء اللہ



Deputy Director (Estab)

ملگری استاذان Orakzai

By Syed Awan: Ali Shah SPET GHS Avi Mela Central Orakzai

ضلع اورکزئی کے ملگری استاذان اللہ کے مدد سے بڑا دعوا محکمہ تعلیم اورکزئی میں بڑے پیمانے پر کرپشن کا راز کھول گیا ضلع اورکزئی کے محکمہ تعلیم میں کرپٹ مافیا کے ملی بھگت سے ضلع اورکزئی میں مسلم کرکس، ہنگو، کوہاٹ کے استاد بھرتی کرنے کے بعد ضلع کے مختلف کیڈرز کے استاد ایگزیکشن میں جعلی مرسس بکنجلی ڈگریاں۔ جعلی ریفرنس، ریڈی میڈ ڈگریاں پر جعلی استاد اپگریڈ کر کے اورکزئی کے کرپٹ ڈسٹرکٹ ایجوکیشن آفیسر فرید اللہ کا مکروہ چہرہ بے نقاب ہو گیا مندرجہ بالا تصویری کمپینٹ جس میں ایجوکیشن آفس کے کرپٹ ٹولے نے ملگری استاذان کے ایک کارکن کے خلاف پشاور سروس ٹریبونل عدالت میں جھوٹے اور بے بنیاد الزامات کا ٹرامہ کھول کر سامنے آگیا ضلع کے پورے مافیا نیٹ ورک نے ایک کمپینٹ کی شکل میں ہمارے اوپر جھوٹے اور بے جا الزامات لگا کر کرپشن بے غیرتی اور بے ایمانی کے ریکارڈ قائم کیے کرپٹ ٹولے کے 19 گریڈ کے ایجوکیشن آفیسر اور 17، 18 گریڈ کے کرپٹ آفیسرز نے اپنی کمپینٹ بھی درست طریقے سے نہیں لکھ سکے کرپٹ ٹولے نے کمپینٹ میں قلم چھوڑ کر کالم جوڑ جملہ ملازمین کو جملہ ملازمین معذرت خواہ کو معذرت ہو لکھ کر اپنے بالائقی کا ثبوت دیا ہے اس سے اندازہ ہے کہ اب چور کالم بھی لکھنے لگے ہیں لہذا ہم کرپٹ ٹولے سے یہ پوچھتے ہیں کہ اگر آپ مافیا ٹولے میں تھوڑی سی ایمان اور غیرت ہے تو واقعی ایماندار مافیا ہیں تو کھول کر میدان میں آؤ جھوٹے الزامات سے کچھ نہیں بنتا ہمارے پاس تو نہ ٹینک ہے اور نہ فورسز ہیں اب کس چیز سے ڈرتے ہیں اب کے پورے ایم کے اوسان خطا ہو کر پورے آفس میں کھابلی مچ گئی ہیں پورے مافیا سسٹم ویران اور پریشان ہیں اور یہ بھی یاد رکھیں کہ اب کے مافیا نیٹ ورک لونر تحصیل کے چور کرپٹ مداری بھگوان داس پر بھروسہ ہیں اور ہمارے ٹیم کا بھروسہ اس ذات خدا پر ہے جس نے تمام دنیا پیدا کیا ہے اور تمام دنیا اس کے قبضہ قدرت میں ہے اور ہمارے ساتھ ضلع اورکزئی کے غریبوں، یتیموں، اسرا، بیواؤں اور مظلوم لوگوں کی دعائیں ہیں، اب یاد رکھیں کہ دنیا کی طاقت ہمیں برا تمنا درد دل کی ہوں تو کر خدمت فقیروں کی نہیں ملتا یہ نہیں سکتے شاعر مشرق علامہ اقبال کی وہ شعر لکھیں گوہر بادشاہوں کی خزینوں میں (پشتو کا مشہور شاعر کا شعر) (جے اللہ درسرہ مل نہ وی رحمانہ..... کہ لاکر.... درسرہ وی یک تنہا ہے)..... کمپینٹ میں ایک دو نمبر مافیا لیٹیگیشن کلرک اسد نامی مافیا کرپٹ ایجوکیشن آفس نے استعمال کر کے عدالت عظمیٰ کو جھوٹے اور بے بنیاد الزاماتی کمیشن پر اپنے ناجائز اختیارات کا استعمال کی دستخط تمہا کر قانون اور آئین پاکستان کی کھلی خلاف ورزی کر کے مذاق اڑایا ہے جیسا Competent Authority کے تصویری کمپینٹ میں دکھایا گیا ہے موجودہ کلرک نے گزشتہ کئی سالوں سے گورنمنٹ ہائیر سیکنڈری سکول کلاہ کی سرکاری ڈیوٹی چھوڑ کر ہمارے ضلع کے معصوم بچوں کے مستقبل سے کھیل رہے ہیں مافیا تین چار سال پہلے بھی اورکزئی کے پولیٹیکل ایجنٹ زبیر خان نے اس مافیا پر ایجوکیشن آفس میں آنے پر پابندی عائد کیا تھا مافیا ایک سال میں پورا ایک لاکھ روپے سے زائد سرکاری خزانہ لوٹ کر رہا ہے مافیا نے سکول کی بجائے ایجوکیشن آفس میں ایک کلرک کی ڈیوٹی دیکر سارا دن ایجوکیشن آفس کا طواف کر رہا ہے مافیا کسی صورت ایجوکیشن آفس چھوڑنے کو تیار نہیں ہے انشاء اللہ بہت جلد مافیا کی کرپشن کی داستان میڈیا کے منظر عام پر لائے گئے۔ 2۔ اقبال حسین ایس ایس ٹی جو کہ سالوں سے اپنی سکول کی ڈیوٹی چھوڑ کر سیاسی مداری کی ملی بھگت سے اورکزئی ایجوکیشن آفس میں قبضہ جما کر اورکزئی کے غریب، سادہ لوح اور مظلوم عوام سے شناختی فارم کی تصدیق کی مد میں 20 روپے سے لیکر 500 روپے تک رشوت وصول کر لوٹتے ہیں جو واقعی بڑا ظلم اور زیادتی ہے..... دوسرے طرف ضلع اورکزئی کے چند مخصوص ایجنٹ لونر تحصیل کے ضلع کوہاٹ کچھ پکے ہیں ایک مقامی مسجد کے صحن میں ڈبرے ڈال کر کرپٹ ڈسٹرکٹ ایجوکیشن آفیسر اور کرپٹ سیاسی مداری کی ایما پر کلاس فور کی نوکریاں کے حصول کے لئے دن رات کر کے فی کس 50000 ہزار سے لیکر ایک لاکھ روپے تک رشوت وصول کر کے سرگرم ہیں جبکہ باقی تحصیلوں کے ہنگومیں ایک مسجد کے قریب رشوت لینے کے لئے سرگرم ہیں ملگری استاذان کے فلیٹ فارم سے خبردار کرتے ہیں کہ خدا کے لئے اپنی حق پر رشوت مت دیں یہ آپ کی قانونی حق ہے آپ کی یہ رشوت دینا دنیا اور آخرت کی بربادی کا سبب بنے گا..... ضلع اورکزئی کے ملگری استاذان ضلع کے نام نہاد تنظیموں اور خاص کر ایجوکیشن آفس کے مافیا بلکہ پورے ضلع اورکزئی کے کرپٹ رشوت خور کالی بھیڑیوں کو چیلنج کرتے ہیں کہ آپ لوگ، ٹیبا، ڈاکٹر پر آکر ہم سے مناظرہ کرے اگر آپ پر کرپشن ثابت نہ کر سکے تو سروس سے استعفیٰ دیے گئے اگر ثابت کر دیا تو آپ کے لئے آپ لوگوں میں اگر زرا سی بھی غیرت اور ایمان ہو تو پھر ایجوکیشن آفس کا طواف بند کر کے ضلع کے غریب اور مظلوم عوام کی حقوق پر ڈاکہ ڈالنا بند کریں آخر میں میں ہم ضلع اورکزئی کے غیور اور غیرت مند لوگوں سے معافی چاہتے ہیں اس رپورٹ پر..... باقی مندرجہ بالا جس نے ہمارے ٹیم کے خلاف اور ٹیم کے ایک کارکن کے خلاف جھوٹے الزامات اور کمپینٹ پر مبنی دستخط کرنے والے مافیا کو برملا کہہ رہے ہیں کہ آج کے بعد اگر ہمارے

Deputy Director (Estab)

ٹیم اور اعوان علی شاہ کا جو بھی نقصان ہوا ہے اور یا مزید ہو گا تو تمام تر ذمہ داری سیاسی مداری اور مندرجہ بالا کرپٹ مافیا پر عائد کی جائے گی ضلع اورکزی کے تمام سوشل میڈیا پریس میڈیا اور تمام دوستوں سے درخواست کرتے ہیں کہ یہ پوسٹ زیادہ سے زیادہ شائع کریں اور اورکزی کے محکمہ تعلیم کے کرپٹ مافیا کو بے نقاب کرنے میں ہمارے ساتھ دیجئے۔ شکریمہ (لیارہ کہ سومرہ اوگدہ دہ خوستمانہ نہ یو سمونگ پ خیل گل بخارت باندے پشمانہ نہ یو)

Comments

ملگری استاذان_Malgari_Ustazian_orakzai

خاموش مافیا کو اپنی بے ایمانی اور بے غیرتی کا ٹھوس ثبوت کے ساتھ جواب دیتا ہوں خاموش مافیا تم کس کا پیداوار ہو اب مافیا ٹولے نے تو ضلع اورکزی کے محکمہ تعلیم کو تباہی پر کھڑا کیا ہے خاموش مافیا آپ سے مخاطب کہتا ہوں آپ نے... گذشتہ 10 سال سے سکول چھوڑ کر مکمل

Khamosh Banda

اعوان نے اگر قوم کے مفاد کے لئے کوئی ایک کام بھی کیا ہو تو بتا دے، ہی اس کا ساتھ دینگے۔

سہ کوئے زور دہ نہ بیا ہوا ہوا تا ٹویونہ ولے رہے

ابھی تک ہم انتظار کر رہے تھے کہ اعوان کوئی ٹھوس ثبوت سامانے لائے گا مگر افسوس کہ باتوں کے سوا اور پان کچھ نہیں

Wawa Syed Sherazi

ہم سب کی ذمہ داری ہے کہ ملکر ان رشوت خوروں کو بے نقاب کریں جو لاکھوں روپے لیکر نااہل لوگوں کو ایجوکیشن میں لارہے ہیں اور یہ ہماری بچوں کی مستقبل کے ساتھ کہیلنا ہے

We have to must condemn them on their corruptions

Udar Ali

واقعی بہت کرپٹ ہیں

Deputy Director (Estab)

Khamosh Banda

اعوان کا مفاد صرف اور صرف ذاتی ہے۔

دفتر میں خود ایڈجسٹ کرنا!

...پوسٹ دلانا CT اپنے بھائی کوثر علی شاہ کو2

Khamosh Banda

اعوانی ایک ضرب المثل ہے کہ ادھی اپنی صحبت سے پہچانا جاتا ہے تیرے صحبت میں سارے دو نمبری اور تین نمبری لوگ شامل ہیں اور تم بھی ویسے ہی ہو اور بتانے ضرورت نہیں۔

...میرے پاس ایک ایسا ثبوت ہے جب میں وہ پیش کروں گا تو پھر تیرے اپنے علاقے کے لوگ تم پر تھوکیں گے۔

Khamosh Banda

خاموش بندہ جلد مزید خاموشی سے پردہ اٹھانے کا انتظار کریں۔

اور کرنی عوام کو حقیقت بتانا میرا فرض ہے باقی عوام اب بہت سمجھدار ہیں 😊😊😊😊😊😊😊😊😊😊

Syed Hassan Abbas Sherazi

اس کرپشن میں ایجوکیشن ڈیپارٹمنٹ ضلع اور کڑی کا سارا عملہ ملوث ہے کیونکہ چند افراد کرپشن نہیں کر سکتے اور منتخب نمائندے اپنے کرپٹ ٹیم کو بچانے کے لئے سرگرم ہیں

Khamosh Banda

اعوانی پہ غولہ کے تروکی ما ویا نور ہم بے عزتہ کیگے تم کو لوگوں نے بے وقوف بنایا ہے تم سے مزہ لیتے ہیں تم کچھ نہیں کر سکتے دفتر والوں ایک درخواست دستخط کئے تو تمہارے اوسان خطاء ہو گئے کتے کی طرح ادھر اودھر... بھگ رہے ہو لوگوں کی منتیں کر رہے ہو کہ مجھے بچاؤ

Khamosh Banda

جب ملکر استاذان تنظیم بنی ہے اسوقت سے اس میں صرف چھ کارکن تھے اب ترقی کر کے چھ سے پانچ ہو گئے ہیں شامل ہوا ہے جس کا ITA ہیں خائنستہ شیر استاد ان کی بد اخلاقی ہے ایمانی اور اڑائی جھگڑوں سے تنگ ہو کر... کا ویلکم بینر ہے اور بیڈ ہے اعوان نے اس تنظیم کو ITA ثبوت

Deputy Director (Estab)

Khamosh Banda

اس تنظیم کے جتنے ممبر ہیں سارے کام چور اور سکول ڈیوٹی سے بھاگنے والے ہیں ملگری استاذان کا نام استعمال کر کے بورڈ اور یو نورسٹی کے ہر امتحان میں یہ ڈیوٹیاں لگاتے ہیں

Khamosh Banda

بقول اب کے کہ مافیا دفتر کا چکر لگاتے ہیں یہ تم روزانہ دفتر کے چکر کیوں لگاتے ہو اگر دفتر اتنا کرپٹ ہے تو پھر تم کو اس دفتر سے دور رہنا چاہئے تاکہ تیری بدنامی نہ ہو تم کس حیثیت دفتر آتے ہو گالیاں دیتے ہو دفتر کے رجسٹر... چوری کرتے ہو اگر مرد کے بچے ہو تو

Khamosh Banda

یہ ملگری استاذان کا نام اپنی ذاتی مفاد کے لئے استعمال کر رہا ہے

Khamosh Banda

اگر اس کام چور اعوان کے پاس ثبوت ہیں تو پیش کریں

Khamosh Banda

جو ڈرامہ اعوان علی اور اس کے ٹولے اور رشید بابو ڈی ای او صاحب کو بدنام کرنے کے لئے رچایا اس سے بھی اس پر وہ اٹھاتا ہوں۔ رشید بابو اور اعوان علی کے دوست ہیں۔ اوی فیملہ ہائی سکول سے ان کی دوستی ہے رشید نے بھی... کبھی سکول نہیں دیکھا اور اعوان نے بھی کبھی کیا

Sirkanie Zalmi

فرید اللہ صاحب اور کزبی انجنسی ایک دو مہینے ہو گئے ہیں آیا ہیں اس لگتا میں فرید اللہ صاحب سختی کرتا ہیں اب لوگ برداشت نہیں کرتے ہیں پھر نازیہ پوسٹ کرتے ہو

Khamosh Banda

تم باتونی مافیا ہو۔ اس تنظیم میں تیرے سوا کوئی نہیں ہے۔ عورتوں کی طرح صرف زبان چلاتے ہو تم نے فرید اللہ کے بارے 20 کو سارے اور کزبی میں افواہ پھیلانی تھی کہ آج فرید اللہ ٹرمینیٹ ہو جائے گا یا ٹرانسفر میرے خیال میں تم... سمجھتے ہو کہ تیرے باپ کی حکومت ہے

Deputy Director (Estab)

ڈسٹرکٹ ایجوکیشن آفس اور کزنٹی۔

عنوان: درخواست بمراد برائے مداخلت کارسہ کار بمقام ڈسٹرکٹ ایجوکیشن آفس اور کزنٹی۔

نہایت آدب سے گزارش ہے۔ کہ سید اعوان علی شاہ SPET GHS Avi Mela Orakzai نامی استاد روزانہ آفس آتا ہے اور سرکاری امور میں غیر ضروری مداخلت کرتا ہے اور اپنی من مانی پر تلا ہو ہے۔ ناجائز کام نہ ہونے کی صورت میں جملہ سٹاف کو پستول دیکھا کر حراساں کرتا ہے۔ اور ساتھ ہی سوشل میڈیا پر دفتر ہذا کے خلاف منفی پروپیگنڈہ کرتا ہوا چلا رہا ہے۔ (نقل منسلک ہے) جس کی وجہ سے جملہ سٹاف شدید ذہنی کوفت میں مبتلا ہیں۔ اور جس کی وجہ سے سرکاری امور نمٹانے میں ہم جملہ ملازمین کو رکاوٹ پیش آرہی ہے۔

لہذا ہم جملہ ملازمین درخواست کرتے ہیں کہ ہمیں اس ذہنی کیفیت سے نکالنے کے لئے مذکورہ استاد کو دفتر آنے پر پابندی لگائی جائے اور ساتھ ہی کارسہ کار میں مداخلت کا FIR بھی درج کی جائے۔

جملہ ملازمین

ڈسٹرکٹ ایجوکیشن آفس، ضلع اور کزنٹی۔

1-Raees Khan, ADEO.....

2-Abdul Malik, ADEO.....

3-Iqbal Hussain, ADEO.....

4-Daulat Shah, ASDEO.....

Deputy Director (Estab)

OFFICE OF THE

EDUCATION OFFICER-ORAKZAI

No. 1490... Date... 2.13.2021

To, ✓ District Polico Officer,
District Orakzal.

Subject: APPLICATION OF LODGING AN FIR AGAINST SYED AWAN ALI SHAH SPET
AT GHS AVI MELA CENTRAL ORAKZAI IN ENCROACHMENT OF GOVT.
AFFAIRS.

It is submitted for your kind information that a SPET teacher named Syed Awan Ali Shah of GHS Avi Mela in district Orakzal is continuously doing his dirty politics on social media by posting hate speeches and defamatory posts against the undersigned for unknown reasons.

Elders, notables and his other colleagues teachers requested him so many times to not waste his and office time in such misconduct and defamation on social media and other sources but he has not heeded over their requests and he never restrained himself and still continued.

In this connection I personally requested worthy Deputy Commissioner Orakzal for taking an action against him under the relevant rules of law.

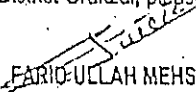
Apropos, collective application is also submitted by all the staff members of DEO Orakzal office wherein they are requesting to take action against the culprit and make him held under the Khyber Pakhtunkhwa Efficiency & Discipline Rules 2011 (Amendments).

It is further added that the said SPET is also involved in misplacing of various official record i.e. Dispatch Register, Attendance Register, NSER tablets from Mr. Ahmad Khan, mobiles robbery from officials, mugging Laptop of Mr. Sohan Ali as he is visiting office with weapon and trying to pressurize officials of this office. He has given threat to the undersigned for undue favors. Complaint from elders of the Avi Mela area in Central Orakzal has also been received via Citizen Portal, complaint in hardcopy is also received to this office about his long absence from GHS Avi Mela-Orakzal. Absentee report by the concerned ADEO is also received, departmental proceeding is already underway. However, now this office is fed-up from his illegal activities and we have no option but to request to make him countable under encroachment in Govt. affairs.

Today on 2/3/2021 at 11:29 AM, the said employee once again visited office of the undersigned with weapons (pistol) and threaten me along with other officials of this office for unknown reasons. Class-IVs of this have brought him out but it is not the enduring solution of the matter. This particular employee has put this office under thoughtful security risk and terror. Hence, we have no other option but to lock our office as no security cover is provided to this office instead of repeated requests.

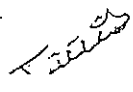
Therefore, it is requested that an FIR may be lodged against Mr. Awan Ali Shah SPET-BS: 16 of GHS Avi Mela Central tehsil of District Orakzal upon his continuous encroachment & disturbance in Govt. affairs of Elementary & Secondary Education District Orakzal, please.

Waiting for an early action, please.


FARID-ULLAH MEHSUD
District Education Officer,
District Orakzal

Encls No. 1491-94 dated 2.13.2021

- 1) Director E&SE Khyber Pakhtunkhwa.
- 2) Additional Director (Estab.), NMDs, Peshawar.
- 3) Deputy Commissioner, Orakzal.


Deputy Director (Estab)



OFFICE OF THE DEPUTY COMMISSIONER
DISTRICT ORAKZAI

0925-690008, 0925-690003.

0925-690007.

✉ dcorakzai@gmail.com

@DCOrakzai

No. 377 /C/DC-Ork

Dated: 03 March, 2021

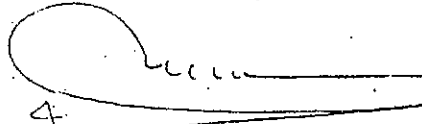
To The Secretary
Elementary & Secondary Education
Khyber Pakhtunkhwa.

Sub:- IMMORAL ACTIVITIES OF THE TEACHER MR. SYED AWAN ALI SHAH

Dear Sir,

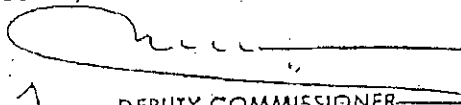
Enclosed find herewith a letter bearing No. 1490 dated 02-03-2021 on the subject noted above.

District Education Officer (Male) has complained against the illegal and immoral attitude of Mr. Syed Awan Ali Shah s/o Syed Zamin Jan (SPET) Govt. High School Avi Melo Lower Orakzai and has requested the District Administration to take legal action against him under the rules. In view of the above Mr. Syed Awan Ali Shah SPET Govt. High School Avi Melo Lower Orakzai is hereby surrendered to Elementary & Secondary Education Department, Khyber Pakhtunkhwa immediately with the request to conduct a formal enquiry into the case under the E&D rules and take action against him subsequently, please.


DEPUTY COMMISSIONER
ORAKZAI TRIBAL DISTRICT

Copy of even No. And date forwarded to:-

1. Director Education, Khyber Pakhtunkhwa.
2. Commissioner Kohat, Division Kohat.
3. District Police Officer Orakzai with the request to take action against the official concerned according to relevant law/rules, please.
4. District Accounts Officer Orakzai with the directions to stop the salary of the above mentioned teacher immediately.
5. District Education Officer Orakzai for necessary action.


DEPUTY COMMISSIONER
ORAKZAI TRIBAL DISTRICT

Deputy Director (Estab)

مرکز ایم بالائی بار مراد علی شاہ صاحب
بہ سندھ سراج سندھ لکھنؤ سندھ سراج سندھ
خانہ ۵۰۰۰ سندھ سراج سندھ سراج سندھ
مرکز ایم بالائی بار مراد علی شاہ صاحب
مرکز ایم بالائی بار مراد علی شاہ صاحب

1110-PS-UST
20-05-08

مرکز ایم بالائی بار مراد علی شاہ صاحب
مرکز ایم بالائی بار مراد علی شاہ صاحب

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Deputy Director (Estab)

Handwritten signature

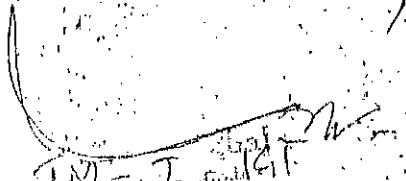
بیان زیر دفعہ 164/64

بیان خصوصی صورت بیان و لاہ محمد علی کنسٹرکشنز / 52/53 میں سیکرٹری ہاؤس
 مقرر فیروز ضیل تہہ عدلیہ ضیل ڈاکھانہ فیروز ضیل جوڈیشل کورٹ کے احاطہ میں
 حلقہ بیان کیا کہ مورخہ 20/05/2015 کو میں نے اپنی درج ذیل صورتوں کے متعلق
 کے خلاف FIR رقمہ ایس آر میں درج کر دی تھی جن میں سے پہلی ایک
 شخص جوڑی ہے کہ میں نے ایس آر میں بیان کیا ہے کہ میں نے ایک بار
 لیڈر ضیل جوائن فرم کے ایس آر میں بیان کیا ہے کہ میں نے ایک بار
 (3) محل انور عرف نازک بیرون بیرون ایس آر میں بیان کیا ہے کہ میں نے ایک بار
 بیرون محل انور میں دہریہ ڈاکو حملوں میں بیرون میں ایک بار ایس آر میں بیان کیا ہے کہ
 اور میری مورٹگاج کارڈ میں ایس آر میں ایک ایس آر میں بیان کیا ہے کہ میں نے ایک بار
 اور ایس آر میں کارڈ کو تصدیق ایس آر میں ایک ایس آر میں بیان کیا ہے کہ میں نے ایک بار
 دیگر ایس آر میں یہ ہیں بیان ہے

محمد علی کنسٹرکشنز

ال خصوصی صورت بیان و لاہ محمد علی کنسٹرکشنز

14301-8764318-5
0333-9610922


 JM - I
 25-05-21

مذکورہ

قائد استریٹ پروانا پانچواں / ہزارویں

مقدمہ 174 رقم 20 2021
324-447-34
1148-1443-109

ہام نام سید انور علی شاہ ولد ضامن خان سہ قوم پانچواں ہزارویں

سید نصیر حسین ولد نعلی انور عرف ہزارویں

سید ناصر حسین ولد نعلی انور عرف ہزارویں

نعلی انور عرف ہزارویں ولد سید حسین افضل

سید ضامن خان ولد سید حسین افضل

رہے دولت ہزارویں رعایت نامعلوم

ما علی ا۔ سید عمران محمد املا قریباً ہجرت خان ولد قمر الدین
خیر علی تم ہجرت خیل ضلع اورنگ آباد خال کریم ہزارویں
سید درج رحیم سیدنا محمد باقری مانند آئی بیان کیا کہ سید
انور علی شاہ ولد ضامن خان کیسے آئی گئی آئی گئی بیان کیا
ہزارویں نے نعلی انور عرف ہزارویں کے تعلق سے
سید نے بیان کیا کہ نعلی انور عرف ہزارویں کے تعلق سے
ہذا سید انور علی شاہ ولد ضامن خان کے مقدمہ کے
بالا سید نے بیان کیا کہ سید نے بیان کیا کہ سید نے بیان کیا
کہ سید نے بیان کیا کہ سید نے بیان کیا کہ سید نے بیان کیا
ماضی میں ہزارویں نے بیان کیا کہ سید نے بیان کیا کہ سید نے بیان کیا
پر مقدمہ میں ہزارویں نے بیان کیا کہ سید نے بیان کیا کہ سید نے بیان کیا

101141.0510221
2021-05-26

سید انور علی شاہ
سید ناصر حسین
سید ضامن خان
سید نصیر حسین
نعلی انور عرف ہزارویں

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- 1) آپ کی پہلی appointment کب ہوئی؟ کا پی لف کریں۔
- 2) آپ کی پہلی appointment کیاں پر ہوئی؟
- 3) موجودہ پوسٹ پر آپ کے آرڈر کب ہوئے؟ کا پی لف کریں۔
- 4) موجودہ پوسٹ پر orders ہونے سے پہلے آپ کیاں تعینات تھے؟
- 5) آپ کی تنخواہ کیوں بند کی گئی؟
- 6) آپ کی تنخواہ کس نے بند کی؟ کا پی لف کریں۔
- 7) آپ نے تنخواہ کی بندش کے خلاف کسی کو داد درسی کی درخواست دی اگر ہاں تو کا پی لف کریں۔
- 8) آپ کو رٹ کیوں لگے؟
- 9) عدالت نے آپ کو کیا Relief دی؟
- 10) آج کل آپ کیاں ڈیوٹی سرانجام دے رہے ہو؟

محمد
12/11/2022
وجیم الدین احمد

انکو ادنیٰ آفیس

ڈیوٹی ڈائریکٹر انسٹیٹیوٹ

سوالنامہ ہرزے اعوان علی شاہ

12/11/2022

2601-268307/5

2601-5014028-5

(2) حیات خان

(3) وجیم شاہ

آج ٹھیکہ، 2022-1-3 میں اپنے پوسٹ و 17 سے

تشریحی طور پر بیان دیتا ہوں کہ

دراختہ اعلیٰ عدالتی شہانہ بی ای ٹی - ٹورنٹو ہائی اسکول

میں دسمبر 2022ء تک نقد بھیجی نہیں رہی تھی اور نوہ سڑک

ان کی وجہ سے علاقہ میں انتہائی شدید آگے میں ٹیکو تاک

تاریخ ضابطے پر ریٹے کے طور پر اسٹاڈنٹل

قبول نہیں کیے گئے تھے۔ اس کے علاوہ S.P.E.T

کو ریٹے کی طور پر بھی اٹھانے پر تیار نہیں

ہے۔ یہ تمام مہنگی سڑکوں میں سے ہے اور سڑکوں

کو جمع کرنے سے آگے نہیں آتے

میرزا مہتاب کو وہاں ٹرانس کی وجہ سے

ان کو بیان سے تبدیل کر کے

سے بیان کے طور پر

۱۴۱۶ کان

شہانہ بی ای ٹی

21601-0900332-5

آج

21601-7683077-5

② حیات خان

21601-9014028-5

③ شہانہ بی ای ٹی

For P. R. R. R.

INQUIRY REPORT OF MR. AWAN ALI SHAH, SPET BS-16, GHS, AVI MELA,
DISTRICT ORAKZAI

In compliance with Notification No. 16773-76/A-12/1st AE/Enquiry File/Pakka Cover, the undersigned visited District Education Office, District Orakzai on 27-12-2021, in order to probe into the matter mentioned in the letter No. 9329 dated: 14-12-2021, by DEO Orakzai.

BACKGROUND OF THE CASE:-

Syed Awan Ali Shah SPET was transferred from GHS, Avi Mela, District Orakzai to District Education Office, District Orakzai vide No. 60-64 dated Peshawar the 02-06-2020 by Directorate of E&SE Khyber Pakhtunkhwa Peshawar (ANNEX-A). This notification was withdrawn by Directorate of E&SE Khyber Pakhtunkhwa Peshawar vide No. 887-92/A-12/E-7 dated: 02-07-2020 (ANNEX-B). Syed Awan Ali Shah SPET took over charge in GHS Avi Mela, District Orakzai as per Teacher Attendance Register (ANNEX-C). He performed his duties there in the school till the decision of his appeal on 30-11-2020 filed on 10-09-2020 before the Khyber Pakhtunkhwa Service Tribunal Peshawar. The decision states that **"In the meanwhile the operation of the impugned notification bearing Endorsement No. 887-92/A-12/E-7 dated 02-07-2020 SHALL REMAIN SUSPENDED IF NOT ALREADY ACTED UPON TILL THE DATE FIXED"** (ANNEX-D).

PROCEEDINGS:-

A complaint by the elders (Unknown) of the village was received to the office of DEO, District Orakzai on 21-12-2020 about the absence of Syed Awan Ali Shah SPET and his side business (ANNEX-E). DEO, District Orakzai issued him SHOW CAUSE NOTICE vide No. 6816 dated 21-12-2020 (ANNEX-F). The DEO, District Orakzai then issued him another SHOW CAUSE NOTICE vide No. 115-A dated 10-02-2021 (ANNEX-Fa). Syed Awan Ali Shah SPET didn't respond to any of the SHOW CAUSE NOTICE rather he started defamation campaign against DEO and other Officers of the DEO Office, District Orakzai through Social Media (ANNEX-Fb). Then four Circle ADEOs namely Raees Khan, Abdul Malik, Iqbal Hussain and Daulat Shah complained against Syed Awan Ali Shah SPET about his misconduct and unlawful interference in the office matters (ANNEX-Fc). On 02-03-2021, Syed Awan Ali Shah SPET once again visited the office of the DEO with weapons and threatened DEO, DEO, District Orakzai then wrote a letter vide No. 1491-94 dated: 02-03-2021 to District Police Officer, District Orakzai to lodge a FIR against Syed Awan Ali Shah SPET (ANNEX-G). A copy of the same was forwarded to Deputy Commissioner, District Orakzai. Deputy Commissioner, District Orakzai vide No. 377/C/DC-ork dated 3-3-2021 surrounded services of Syed Awan Ali Shah SPET to E&SED and recommended inquiry into the matter (ANNEX-H). DC directed sternly to District Account Officer, District Orakzai for Stoppage of his Salary in intimation to the Deputy Commissioner Office, District Orakzai. Then FIR No. 174 dated 20-5-2021 was chalked out against Syed Awan Ali Shah SPET on the report of Mehboob Khan S/O Muhammad Akbar (ANNEX-I). Superintendent of Police Investigation vide No. 1856/GC dated Kohat the 01-6-2021 informed DEO, District Orakzai and to take Departmental action against Syed Awan Ali Shah SPET (ANNEX-J). During visit to the office of the DEO, District Orakzai the undersigned called Syed Awan Ali Shah SPET time and again but he didn't respond. Then the undersigned sent him Text Message to attend the office but he didn't respond. After one week he informed the undersigned through Text Message that he will come to the office of the undersigned within three days but he didn't come. Syed Awan Ali Shah SPET came to the office of the undersigned on 12-1-2022 and I served upon him a questionnaire (ANNEX-K). He requested for some time to respond but still I am waiting for his response. Some elders submitted joint statement about the absence and misconduct of Syed Awan Ali Shah SPET (ANNEX-L).

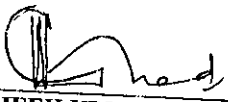
FINDINGS:-

- i. Syed Awan Ali Shah SPET was transferred to DEO Office on 2-6-2020 by Directorate of E&SE Khyber Pakhtunkhwa Peshawar but the same notification was cancelled on 2-7-2020 by the competent authority.
- ii. Syed Awan Ali Shah SPET filed appeal on 10-9-2020 before the Khyber Pakhtunkhwa Service Tribunal against notification No. 887-92/A-12/E-7 dated 2-7-2020.
- iii. Khyber Pakhtunkhwa Service Tribunal in its order dated 30-11-2020 decided that **"In the meanwhile the operation of the impugned notification bearing Endorsement No. 887-92/A-12/E-7 dated 02-07-2020 SHALL REMAIN SUSPENDED IF NOT ALREADY ACTED UPON TILL THE DATE FIXED"**.
- iv. The same order was wrongly interpreted by Syed Awan Ali Shah SPET and he interpreted it as a "Status Que".

RECOMMENDATIONS:-

- i. As the Khyber Pakhtunkhwa Service Tribunal orders were wrongly interpreted by the employee concerned so his absence period may be considered as leave without pay.
- ii. He may be transferred to another Newly Merged District.
- iii. Social Media Campaign by him against DEO, District Orakzai may be forwarded to FIA Cyber Crime Wing and in the light of that report he may be treated under E&D rules 2011.
- iv. As the case is subjudice, so all the above recommendations may be implemented after decision of the case.

Dated: 18/03/2022


WAJEEH UDDIN AHMAD
DEPUTY DIRECTOR/INQUIRY OFFICER
DIRECTORATE OF E&SE KP PESHAWAR



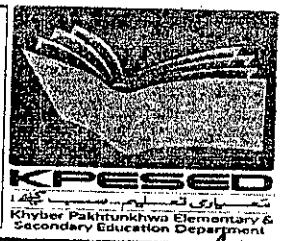
OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohat Road, Muslimabad-Hangu.

Phone # 0925-690017 Fax # 0925-690017

Email: deorakzai2020@gmail.com

No. 871, Dated: 22/02/2022



To,

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

*For Approval,
S. AWAN Ali Shah*

Subject: **ACTION AGAINST THE AGENTS OF DEGREE SELLERS FROM FAKE, ILLEGAL, UNLAWFUL AND UNRECOGNIZED INSTITUTIONS:**

In light of this office letter to the Higher Education Commission (HEC) Islamabad bearing No. 200, dated 11/01/2022 regarding recognition & affiliation of Islamic University of Pakistan Sialkot & subsequent list of Fake, Illegal, Unlawful and Unrecognized Institutions in Punjab at serial No. 96 on HEC URL: <https://www.hec.gov.pk/english/universities/Pages/AJK/Illegal-DAIs.aspx>, and Assistant Controller Examinations (Certificates) University of Balochistan, Quetta office letter No. 58/Exams:/Cert., dated 14/02/2022.

Apropos, the undersigned has reported/withdrawn the appointment orders of the following appointees in E&SED Orakzai for either having fake & bogus degrees or possessing degrees from fake, illegal, unlawful & unrecognized institutions i.e Islamic University of Pakistan Sialkot, Punjab.

S#	Name of the degree holder	Father Name	CNIC No.	Post	Year of appointment	Remarks
1	CHAMAN SULTAN	SAYED ZARIN KHAN	21603-8820435-4	CT BPS: 15 at GGMS Kata Panra	Via ETEA 2020-21 Degree from Fake University	Officer order bearing Endst: No. 9378-90, dated 04/11/2021, hence the appointment order to her extent at S. No. 19 is withdrawn with effect from the date of its issuance vide No. 416-28, dated 22/01/2021.
2	FOZIA GUL	GULA KHAN	21603-8417858-2	AT BPS: 15 at GGMS Tooti Bagh	Via ETEA 2020-21 Degree from Fake University	Officer order bearing Endst: No. 9391-403, dated 04/11/2021, hence the appointment order to her extent at S. No. 03 is withdrawn with effect from the date of its issuance vide No. 416-28, dated 22/01/2021.
3	HAFIZ ULLAH	GUL SAIF KHAN	21604-923820-9	SST-G BPS: 16 GMS Zanka Khel	Via ETEA 2020-21 Degree from Fake University	Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar Endst: No. 14749-55/F.No. 01/SSTs Contract Appointment

						bearing Endst: No. 9430-44/SSTs-Male/Orakzai/2020-21, dated 04-11-2021 is withdrawn with the effect from issuance of his appointment order vide Director E&SED KP notification bearing Endst.No. 1900-1904, dated 11/02/2022.
4	ALI HASSAN	MUHARRAM KHAN	21603-9802589-1	CT-Male BPS: 15 at GMS Mirazai, Orakzai.	Via ETEA 2020-21 Degree from Fake University	Officer order bearing Endst: No. 9284-96, dated 04/11/2021, hence the appointment order to her extent at S. No. 19 is withdrawn with effect from the date of its issuance vide No. 652-64, dated 02/02/2022.
5	MUMTAZ ZAHRA	ABBAS GHULAM	21603-7617239-0	AT-Female BPS: 15 at GGHS Bada Khel, Orakzai.	Via ETEA 2020-21 Degree from Fake University	Officer order bearing Endst: No. 9391-403, dated 04/11/2021, hence the appointment order to her extent at S. No. 04 is withdrawn with effect from the date of its issuance vide No. 652-64, dated 02/02/2022.
6	TAIB HUSSAIN	HILAL HUSSAIN	21603-2506277-1	AT-M BPS: 15 at GHS Dran Sheikhhan Central- Orakzai	Via ETEA 2019-20 Degree from Fake University	Suspended & inquiry was ordered vide this office. Endst: No. 698, dated 04/02/2012. In light of the above, Mr. Taib Hussain s/o Hilal Hussain has been removed from service vide Order No. 813-20, dated 12/02/2022.
7	MUSADDIQ ABBAS	BAHAR ALI	21603-5319317-5	SST (P/M) BPS: 16 GHSS And Khel-Lower Orakzai	Via ETEA 2020-21 Degree from Fake University	Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar Endst: No. 14749-55/F.No. 01/SSTs Contract Appt: (Male)/2021, dated 29/10/2021 and subsequent this office adjustment order bearing Endst: No. 9430-44/SSTs-Male/Orakzai/2020-21, dated 04-11-2021 may be withdrawn with the effect from issuance of his appointment order to his extent at S#8, report already sent to the Director E&SED

8	MUHAMMAD RIAZ	SULTAN MUHAMMAD	1603- 9004864-9	AT-Male BPS: 15 at GMS Shiraz Garhi, Lower Orakzai	Via ETEA 2020-21 Fake & Bogus Degree (BA)	Appointment order bearing Endst: No. 9271- 83, dated 04/11/2021, to her extent at S. No. 9 has already been withdrawn with effect from the date of its issuance vide this office letter No. 911-24, Dated 22/02/2022.
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In light of the above, it is requested that the above mentioned culprits/agents for selling degrees for either having fake & bogus degrees or possessing degrees from fake, illegal, unlawful & unrecognized institutions should be reported to the law enforcement agencies for proceeding under the rules & policy envogue.

Report is submitted for your kind perusal, please.


DISTRICT EDUCATION OFFICER,
ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

- 1) Deputy Commissioner, Orakzai for further necessary legal action.
- 2) District Police Officer, Orakzai with a request for further necessary legal action.
- 3) Managing Director ETEA, Khyber Pakhtunkhwa Peshawar with the request to not entertain the cases of above mentioned candidates in future.
- 4) District Accounts Officer, Orakzai.
- 5) PA to Additional Director (Estab), Merged Districts, Khyber Pakhtunkhwa, Peshawar.


DISTRICT EDUCATION OFFICER,
ORAKZAI

**OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI**

Umar Plaza, Main Kohat Road, Muslimabad-Hangu.
Phone # 0925-690017 Fax # 0925-690017
Email: deorakzal2020@gmail.com

**OFFICE ORDER:**

Reference to this office notices served upon both of the following vide this office letters Nos. 1639, dated 04/04/2022, No. 1867, dated 18/04/2022, No. 1632, dated 01/04/2022 and No. 1888, dated 18/04/2022, wherein they were directed to submit the requisite Bank Challan(s) for verification of their acquired & submitted degrees/documents from the concerned Institution(s) under the terms & condition No.05 of their appointment orders but they failed to submit the same within the stipulated period of time.

Apropos, in light of the condition No. 17 of their appointment orders, the undersigned is pleased to hereby withdrawn/cancelled the appointment orders of the following ETEA adhoc appointees (PSTs BPS; 12) for the year 2020-21 with effect from the date of its issuance.

Order S#	ETEAL ROLL NO.	NAME	FATHER/HUSBAND NAME	DOB	CNIC	MERIT	POST & SCHOOL NAME	REMARKS
01	441742	Hamim Rehman	Haji Rehman	20/09/1995	2160481016755	106.694	GPS Khadizai No.1	Officer order bearing Endst No. 94-106/PST-1/ale/ETEA/2020-21, dated 08/01/2022, hence the appointment order to his extent at S. No. 10 in Upper tehsil of district Orakzai is withdrawn with effect from the date of its issuance.
02	440750	Javid Rehman	Lal wazir	06/05/1990	2160448004179	99.190	GPS Spidar	Officer order bearing Endst No. 94-108/PST-1/ale/ETEA/2020-21, dated 08/01/2022, hence the appointment order to his extent at S. No. 22 in Upper tehsil district Orakzai is withdrawn with effect from the date of its issuance.

[Signature]
DISTRICT EDUCATION OFFICER,
ORAKZAI

Endst: No. 2112-25 Dated: 09/05/2022

Copy forwarded for information and necessary action to the:-

- 1) Director, E&SED Khyber Pakhtunkhwa, Peshawar with the request to take further necessary legal action against the above mentioned culprits/agents etc.
- 2) Deputy Commissioner, Orakzai with the request to take further legal obligatory legal action against the above mentioned individuals.
- 3) District Police Officer, Orakzai with a request for further necessary legal action.
- 4) Managing Director ETEA, Khyber Pakhtunkhwa Peshawar with the request to not entertain the cases of above mentioned candidates in future.
- 5) Federal Investigation Agency, for necessary legal action.
- 6) District Accounts Officer, Orakzai.
- 7) PA to Additional Director (Estab), Merged Districts, Khyber Pakhtunkhwa, Peshawar.
- 8) PS to Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department, Civil Secretariat Peshawar.
- 9) Section Officer (PE), Civil Secretariat, Khyber Pakhtunkhwa E&SE Department Peshawar.
- 10) Head Teacher concerned for necessary action.
- 11) District Monitoring Officer, (EMA), Orakzai.
- 12) Assistant Programmer/CO, HR/MS Cell local office.
- 13) Accountant/Pay Clerk local office for necessary action.
- 14) PSTs concerned.

[Signature]
DISTRICT EDUCATION OFFICER,
ORAKZAI



OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohat Road, Muslimabad-Hangu.

Phone # 0925-690017 Fax # 0925-690017

Email: deorakzai2020@gmail.com



OFFICE ORDER:

Reference to the resignation/not joining on judicial stamp paper vide No. 3157 and 3154 duly attested by the Oath Commissioner/Notary Public Hangu, dated 22/03/2022 tendered by Mr. Azmat Ullah s/o Ghafoor Muhammad PST BPS: 12 GPS Taghee Killi & Mr. Tahir Rehman s/o Ghafoor Muhammad BPS: 12 GPS Khee Kada No.2

Apropos, upon the acceptance of refusals/not joining of duty submitted by the PSTs concerned on judicial stamp papers, the undersigned is pleased to hereby withdrawn/cancelled the appointment order of the following newly ETEA appointees (PSTs BPS: 12) for the year 2020-21.

Order S#	ETEA ROLL NO.	NAME	FATHER/HUSBAND NAME	DOB	CHIC	MERIT	POST & SCHOOL NAME	REMARKS
01	442272	Azmat Ullah	Ghafoor Muhammad	01/01/1999	2160286114459	108.182	PST BPS: 12, GPS Taghee Killi, Ismailzai District Orakzai.	Officer order bearing Endst: No. 94-106/PST-Male/ETEA/2020-21, dated 06/01/2022, hence the appointment order to her extent at S. No. 4 is withdrawn with effect from the date of its issuance.
02	440270	Tahir Rehman	Ghafoor Muhammad	06/05/1986	2160234806235	104.610	PST BPS: 12, GPS Khee Kada No.2, Ismailzai District Orakzai.	Officer order bearing Endst: No. 94-106/PST-Male/ETEA/2020-21, dated 06/01/2022, hence the appointment order to her extent at S. No. 7 is withdrawn with effect from the date of its issuance.

**DISTRICT EDUCATION OFFICER,
ORAKZAI**

OFFICE OF THE HEAD MASTER GOVT HIGH SCHOOL AVI MELA DISTRICT
ORAKZAI

Statement of Head Master Govt High School Avi Mela:-

I Mr, Adil Rehman SST I/C Head Master of Govt High School Avi Mela District Orakzai categorically states that Mr, Syed Awan Ali Shah SPET is regular teacher and never has remained absent from his mandatory duties. *fill date 30-11-2020*

Furthermore, he is direct and cooperative teacher. He always extended his service in the best interests of students and peaceful teaching, learning environment of Govt High School Avi Mela District Orakzai.

Adil Rehman
HEAD MASTER
G.H.S Avi Mela
Orakzai