

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,**  
**PESHAWAR CAMP COURT ABBOTABD.**

APPEAL NO.107/2022

SADAR KHAN ..... APPELLANT

VS

**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH  
SECRETARY EDUCATION DEPARTMENT PESHAWAR &  
OTHERS.....RESPONDENTS**

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DISTRICT EDUCATION OFFICER  
(MALE) KOHISTAN UPPER

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,**  
**PESHAWAR CAMP COURT ABBOTTABD.**

**APPEAL NO.107/2022**

SADDAR KHAN..... APPELLANT

VS

1. Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education Peshawar.
3. District Education Officer (Male) Kohistan Upper at Dassu.

.....RESPONDENTS

**Para wise comments on behalf of the respondents No 1,2&3.**

Respectfully Sheweth:

Para wise comments on behalf of the respondents No 1 to 3 are as under.

**PRELIMINARY OBJECTION**

1. That the appellant has no locus standi/cause of action to file instant appeal.
2. That the appellant is estopped to agitate the instant matter before this Honorable Tribunal.
3. That the appellant has not approached this Honorable Tribunal with clean hands.
4. That the appellant has filed instant appeal with malafide intention for wrongful gain and suppressing the original facts, from this Honorable Tribunal, hence the appeal is liable to be dismissed.
5. That the appeal is hopelessly time barred.
6. That the appellant is treated as per rules and law and policy. Therefore, appellant is not entitled for any relief and hence appeal is liable to be dismissed without further proceeding.
7. That the instant appeal is not maintainable in its present form.
8. That appellant was found irregular in her respective duties.
9. That the instant appeal is against the law/service rules hence not maintainable in the eye of law and liable to be dismissed.
10. That the appellant has field the present appeal just to pressurize the respondents.
11. That the act of the respondent within law and rules. Order dated 03-11-2021 issued after fulfillment of the codal formalities hence, appeal is liable to be dismissed.

**FACTUAL OBJECTION**

1. That the Para No.1 of the appeal pertains to record, hence need no comments.
2. That reply of Para No.2 of the appeal is that the Appellant neither took charge in the office of District Education Officer (M) Kohistan nor his office received any evidence regarding his attendance. Further stated that the Appellant was reported willful absent from his official duty without prior approval of leave sanction/permission by Sub Divisional Education Office (M) Dassu w.e.f December 2019 to December 2020 vide letter No.1076 dated 26-08-2020 & No.1227 dated 01-01-2021.

*(Photocopy of the attendance register, Absence report, Show Cause Notice, Reply to show Cause Notice and Demotion order are annexed as annexure "A", "B", "C", "D" & "E" respectively)*

3. Para No.3 of the Service Appeal as composed is incorrect hence, denied. The appellant neither took charge in the office of District Education Officer (M) Kohistan nor performed any duty and the appellant was never asked verbally to serve his services at GPS Seo. The appellant was posted at GPS Seo vide Endstt: No.5600-05 dated 30-1-2021 and in compliance of the order the appellant took charge at GPS Seo on 01-02-2021 and performed his duty till 18-04-2021.

*(Photocopy of the Charge Report, reliving chit & attendance register of GPS Seo are annexed as annexure "F", "G" & "H" respectively)*

4. That the Para No.4 of the appeal as composed is incorrect hence, strongly denied. Further stated that during the visit of Respondent No.3 along with Deputy District Education Officer visited SDEO (M) office on 16-12-2020, the appellant was found absent from his official duty on 16-12-2020. The appellant was also reported willful absent from his official duty by Sub Divisional Education Officer (M) Dassu w.e.f December 2019 to December 2020 and recommended to initiate disciplinary proceedings against the appellant. In the light of absence report the answering respondents served a show cause notice to the appellant vide No.5265-70 dated 15-01-2021 for his willful absence with the direction to submit the reply of show cause notice within seven days
5. Para No.5 of the appeal as composed is incorrect hence, denied. In response to the show Cause Notice the appellant submitted his reply to show cause notice on

20-01-2021 and reply to show cause notice was declared unsatisfactory by the competent authority and the appellant could not defend himself from long willful absence. The appellant in his reply admitted that he is facing difficulties while driving and stated that he be posted as Naib Qasid at School. The answering respondent No.3 after perusal of available record and facts, being competent authority he has demoted the appellant from the post of Driver (BPS-06) to the post of Chowkidar (BPS-03) at GPS Seo after fulfillment of codal formalities vide Endst: No. 5600-05 dated 30-01-2021 and in compliance of the order the appellant took charge at GPS Seo on 01-02-2021 and performed his duty till 18-04-2021. Subsequently the appellant transferred from GPS Seo to GHS Seo vide Endst: No 1673-1711 dated 14-04-2021 but the appellant obstinately refused to obey the orders of the competent authority and appellant did not resume charge and remained willful absent from his duty after adjustment at GHS Seo. The appellant was reported absent by Head Master GHS Seo vide letter No.5051 dated 07-07-2021. In the light of absence report the answering respondents served a show cause notice to the appellant vide No.4775-80 dated 26-07-2021 for his willful absence with the direction to submit the reply of show cause notice within seven days but the appellant neither submitted reply to show cause notice nor availed the opportunity of personal hearing. The appellant was removed from service on the charge of willful absent from duty after observing all the pre requisite codal formalities and with the satisfaction that the appellant was found negligent and habitual in non-performing of his duties vide No.7547-55 dated 3-11-2021.

**(Photocopy of absent report, Show Cause Notice & removal from service order are annexed as annexure "I", "J" & "K" respectively)**

6. Reply of Para No.6 of the appeal has already been given in above preceding paras in detail.
7. Reply of Para No.7 of appeal is that in the light of Honorable High Court Judgment the respondent No.3 sent the case to the respondent No.2 vide letter No. 8015 dated 27/11/2021 but the case is still not decided by the respondent No.2.

service order are annexed as annexure "I", "J" & "K" respectively)

6. Reply of Para No.6 of the appeal has already been given in above preceding paras in detail.
7. Reply of Para No.7 of appeal is that in the light of Honorable High Court Judgment the respondent No.3 sent the case to the respondent No.2 vide letter No. 8015 dated 27/11/2021 but the case is still not decided by the respondent No.2.
8. Para No.8 of the ground as composed is incorrect. The appellant is not aggrieved person, his removal from service order is in accordance with law and issued after observing all codal formalities. Hence appellant is not entitled for any relief.

**GROUND:**

- A. That Para "A" of the ground as composed is incorrect, hence denied. The impugned order dated 14-04-2021, is accordance to law and rule.
- B. That Para "B" of the ground as composed is incorrect, hence denied. The appellant was treated in accordance with rules and law. Further stated that the appellant remained willful absent w.e.f December 2019 to December 2020 (complete one year) without prior approval of leave of sanction. The answering respondent No.3 served a show cause notice to the appellant vide No.5265-70 dated 15-01-2021 for his willful absence. In reply to show cause notice submitted by the appellant wherein he himself admitted that he is not able to drive properly, therefore he should be demoted as Naib Qasid and posted at School. The respondent No.3 after testing his driving abilities, which was extremely poor and substandard and he could not drive the vehicle properly. The appellant was on probation for the period of one year but the appellant has failed to show punctuality. The answering respondents being competent authority is not satisfied with the performance of the appellant and demoted him and adjusted at GPS Seo, later on Appellant was again adjusted at GHS SEO. The appellant deliberately refused to obey the orders of the competent authority and he did not resume charge and remained willful absent from his duty after adjustment at GHS Seo. In the light of

or make personal appearance. Furthermore the appellant failed to resume his duty. He was terminated by the competent authority after fulfillment of codal formalities.

- D. That Para "D" of the ground as composed is incorrect, hence denied. All the proceeding has been taken in accordance with rules and law and the appellant is not entitled for any relief.


***It is therefore humbly prayed that in the light of foregoing comments the appeal may graciously be dismissed with cost throughout.***

  
**SECRETARY**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

(Respondent No.1)

  
**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

(Respondent No. 2)

  
District Education Officer  
(Male) Kohistan  
(Respondent No 3)

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,**  
**PESHAWAR CAMP COURT ABBOTTABD.**

*Service Appeal No.107/2022*


Saddar Khan ..... APPELLANT

Vs

Govt: of Khyber Pakhtunkhwa ..... RESPONDENTS.

**AFFIDAVIT**

*I, Mr. Abdur Rehman, District Education (Male) Kohistan Upper, do hereby solemnly affirm and declare that the para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.*

  
DISTRICT EDUCATION OFFICER  
(MALE) KOHISTAN

**Identified by:**

OFFICE ATTENDANCE REGISTER  
FOR THE MONTH

December 20 1954

OF THE  
Superintendent  
Education  
District 20 19

**Annexure A**

71

Serial No.	NAME	Designation	FOR THE MONTH																													Total No. of Days	Remarks				
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29			30	31		
1	Fritz Moller	Mt																																			
2	Ernest Nansen	St																																			
3	Frederic Knudsen	Mt																																			
4	Samuel Pedersen	St																																			
5	Einar Moe	St																																			
6	Jonas Knudsen	St																																			
7	Augustus Johnson	St																																			
8	Fredrik Rasmussen	St																																			

RECEIVED  
 SUPERINTENDENT'S OFFICE  
 DISTRICT 20  
 DECEMBER 20 1954



DATE

REGISTER

OFFICE ATTENDANCE REGISTER  
FOR THE MONTH OF February 2012

OF THE Substituted and Extension Officers for some

Serial No.	NAME	Designation	2012																													Total No. of Days			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29		30	31	
1	Consuetudo-Rohman	Asst																																	
2	Edgar Melik - Jik	JK																																	
3	Bahar - S/C	JK																																	
4	Valere - Khan JK	JK																																	
5	Shamsi-Rohman	W/O																																	
6	Agal-Har	W/O																																	
7	Sudoi Khan	Driver																																	
8	Ferdal Raeki	C/P																																	

FOR THE MONTH OF February 2012

1000



OF THE SACS (P) DMM  
OF 02 20 20.

OFFICE ATTENDANCE REGISTER  
FOR THE MONTH 02/2007

Serial No.	NAME	Designation	FOR THE MONTH 02/2007																												Total No. of Days	Remarks		
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28			29	30
1	Liza Ullah	WFL																																
2	Faisal Malik	WFL																																
3	Babbar, I. Iqbal	WFL																																
4	M. Yousaf	WFL																																
5	[Name obscured]	WFL																																
6	Shahid Raza	WFL																																
7	Faisal Ali	WFL																																
8																																		

Handwritten signature and date: 02/2007

+



SAC (M) Smith  
March 20 20

OF THE  
OF THE MONTH

OFFICE ATTENDANCE REGISTER  
FOR THE MONTH

Serial No.	NAME	Designation	FOR THE MONTH																													Total No. of Days	Remarks	
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29			30
1	Frost, John	PL																																
2	Robert Nelson	PL																																
3	M. Young	PL																																
4	James Rabin	MO																																
5	Frank King	MO																																

RECEIVED  
MAR 20 1964  
GENERAL INVESTIGATIVE DIVISION

OFFICE ATTENDANCE REGISTER  
FOR THE MONTH

OF THE *Indus Mills* Dacca  
OF *April* 2020

11

Serial No.	NAME	Designation	Days																												Total No. of Days	Remarks		
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28			29	30
11	<i>Legal Malik</i>	<i>J/c</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>
12	<i>M. J. Jee</i>	<i>J/c</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>
13	<i>Subans-ur-Suban</i>	<i>M/O</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>
14	<i>Engal-Har</i>	<i>M/O</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>	<i>R</i>

*Sun days*

*Sun days*

*Sun days*

*Not present*

12

OF THE S.D.E. (see pass)  
OF 177 2020

OFFICE ATTENDANCE REGISTER  
FOR THE MONTH

Serial No.	NAME	Designation	Days																												Total No. of Days	Remarks			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28			29	30	31
1	Fred. Malik	DIC	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	1	
2	Mohamed Yousif	DIC	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
3	S.M. Rahman	NIA	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
4	Samir Hani	NIA	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	

FOR THE MONTH  
177

13

SDe Chp D coker

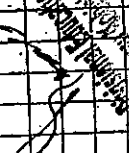
OF THE

OFFICE ATTENDANCE REGISTER  
FOR THE MONTH

2020

OF June

Serial No.	NAME	Designation	Days																															Total No. of Days	Remarks
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
1	Fozal Malik	OL	P	P	P	P	P	P	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	11	
2	Muhammad Yaseen	OL	P	P	P	P	P	P	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	11	
3	SARWAR UL Rehman	OL	P	P	P	P	P	P	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	11	
4	Fozal Malik	OL	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	11	

APPROVED & FORWARDED  
  
 OFFICE ATTENDANCE REGISTER

# OFFICE ATTENDANCE REGISTER FOR THE MONTH

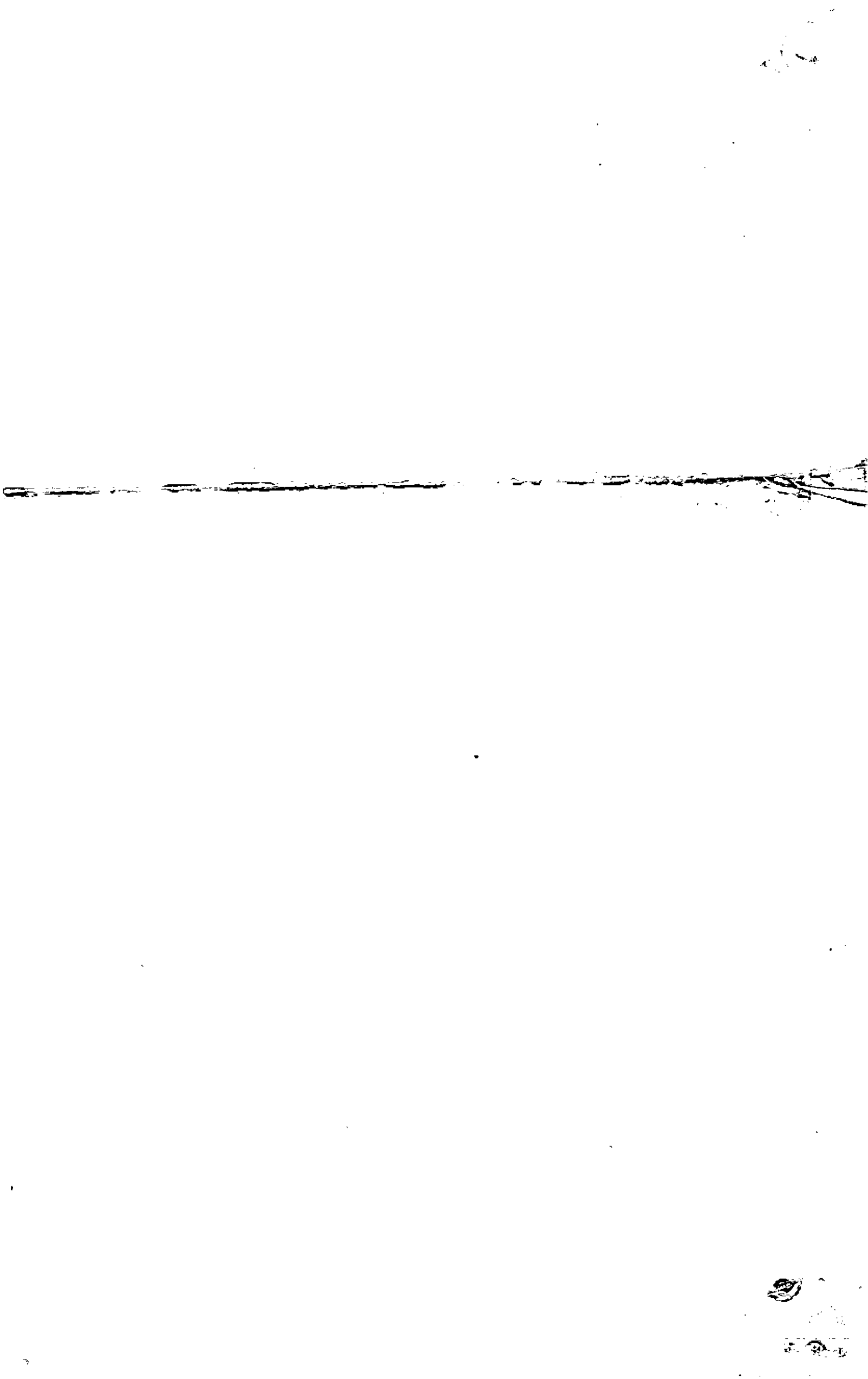
OF THE S. DEPT. CIV. DATA  
OF July 2020

19

Serial No.	Name	Designation	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
1	Frank Maly	TL	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
2	Muhammad Yousef	TL	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
3	Shamsul Rahman	NIB	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
4	Saeed Hasan	NIB	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	

Serial No.	Name	Designation	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks	
1	Frank Maly	TL	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31		
2	Muhammad Yousef	TL	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
3	Shamsul Rahman	NIB	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
4	Saeed Hasan	NIB	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	

FOR THE MONTH  
OF JULY 2020





15

OF THE SOE (or Daily) OF August 20 23

OFFICE ATTENDANCE REGISTER FOR THE MONTH of 2023

Serial No.	NAME	Designation	Date																													Total No. of Days	Remarks			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29			30	31	
1	Fazal Malik	TIC	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E		
2	M. Yaqub	TIC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		
3	Shamshad Khan	MD	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S		
4	Imam Khan	MD	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		

APPROVED  
 OFFICE ATTENDANCE REGISTER  
 2023

10/10/10 11/11/11 12/12/12 13/13/13 14/14/14 15/15/15

1101

16

OFFICE ATTENDANCE REGISTER

FOR THE MONTH

Jan

OF THE

SDS (v.damm)

OF THE

Serial No.	NAME	Designation	FOR THE MONTH																															Total No. of Days	Remarks
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
1	Azal Malik	OTC	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
2	Muhammad Yaseen	OTC	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
3	Shams ul Rehman	NIG	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
4	Azal Malik	NIG	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			

Handwritten signature and date: 20/1/10

Stamp: PAKISTAN GOVERNMENT OFFICIALS ASSOCIATION

**OFFICE ATTENDANCE REGISTER**  
FOR THE MONTH / 6

OF THE *SDE Cy Dashed*  
*October* 2020

17

Serial No.	NAME	Designation	FOR THE MONTH / 6																												Total No. of Days	Remarks				
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28			29	30	31	
	<i>Lazal Malik</i>	<i>SC</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>		
	<i>M. Maseer</i>	<i>SC</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>		
	<i>Shamir Khan</i>	<i>SC</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>		
	<i>Faisal Khan</i>	<i>SC</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>		

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# OFFICE ATTENDANCE REGISTER

FOR THE MONTH Nov.

OF THE 50th (M) DIV.  
OF November 2020

18

Serial No.	NAME	Designation	Days																															Total No. of Days	Remarks
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
	Faisal Malik	S/O	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
	M. Vasanth	S/O	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
	S. Ram. Ramo	S/O	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
	Vasanth	S/O	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		

*(Handwritten signature)*  
S. Vasanth  
S/O  
50th (M) DIV.  
OF NOVEMBER 2020

# OFFICE ATTENDANCE REGISTER

FOR THE MONTH 12/2000



Serial No.	NAME	Designation	1	2	3	4	5	6	7	8	9	10	11	12
1-	Fozal Malik	Jr. J.C.	P	P	P	P	P	P	P	P	P	P	P	P
2-	M. Yaseen	Jr. J.C.	P	P	P	P	P	P	P	P	P	P	P	P
3-	SHAMSU	Jr. J.C.	P	P	P	P	P	P	P	P	P	P	P	P
4-	Fozal Malik	Jr. J.C.	SUN DAY											
5-	Said Khan	Jr. J.C.	SUN DAY											
6-	Muhammadullah	Jr. J.C.	SUN DAY											
<p><i>Serial Char</i></p> <p><i>Direct</i></p> <p><i>not come to office</i></p> <p><i>13/1</i></p> <p><i>Fozal Malik</i></p> <p><i>M. Yaseen</i></p> <p><i>SHAMSU</i></p> <p><i>Said Khan</i></p> <p><i>Muhammadullah</i></p>														





Annexure  
"B"

21

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) DASSU

No. 1076 /SDEO (M) /Absent Dated 26/08 <sup>2019</sup> /2019

To

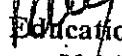
The District Education Officer  
(Male) Kohistan

Subject: - ABSENCE REPORT IN RESPECT OF MR SADDAR KHAN DRIVER

Memo.

It is intimated that Mr. Saddar Khan appointed/posted as Driver in the office of the undersigned on 09/08/2019 by DEO (M) Kohistan. After joining the responsibility the official concerned is absent from official duty without any prior intimation/permission by the undersigned, due to which the official business of the office of the undersigned is being suffered badly.

In view of the above your goodself is requested to take strict disciplinary action against the official concerned with a view to run the official business of the office of the undersigned smoothly.

  
Sub Divisional Education Officer  
(Male) Dassu Kohistan

Endst: No. & Date Even:

Copy forwarded to the Deputy District Education Officer (Male) Kohistan w/r to above for information please.

- SA -  
Sub Divisional Education Officer  
(Male) Dassu Kohistan



2

**OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) DASSU**

No. 1227 /SDEO (M) /Absent Dated: 01/07/2021

To

The District Education Officer-1  
(Male) Kohistan

Subject: - **ABSENCE/NON ATTENDANCE OF OFFICE BY MR SADDAR KHAN  
DRIVER O/O SDEO (M) DASSU**

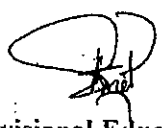
Memo,

It is intimated that Mr. Saddar Khan appointed/posted as Driver in the office of the under signed on 09/08/2019 by DEO (M) Kohistan. After joining the responsibility the official concern remain present up to December 2019, later on the official concerned willfully absented himself from the official duties without seeking prior intimation/permission by SDEO (M) Dassu. On account of absence the official concerned was contacted several times to be present in the office but no positive response have been received so far. Moreover an absence report of the official concerned was reported to your good office accordingly. (Copy Enclosed)

It is recommended that the disciplinary proceedings under E&D Rules 2011 may be initiated against the delinquent official on account of gross misconduct/negligence in official duties by imposing major penalties as deemed fit.

Report is submitted for your perusal as desired please.

Enclosures (17 pages)

  
Sub Divisional Education Officer  
(Male) Dassu Kohistan

Endst: No. & Date Even:

Copy forwarded to the Deputy District Education Officer (Male) Kohistan w/r to above for information please.

Sub Divisional Education Officer  
(Male) Dassu Kohistan



Annexure "C"

23

23



**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) KOHISTAN (UPPER)**

Email: [emiskohistan@yahoo.com](mailto:emiskohistan@yahoo.com) Phone Number: 0998407128

**Office order/ Show Cause Notice:**

I, Muhammad Amin District Education officer (M) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency & Disciplinary, Rules 2011, do hereby serve upon you, Mr. Sadar Khan Driver SDEO(M) Office Dassu, this show cause notice as follows:-

1. As per report of SDEO(M) Dassu, vide No. 1227, Dated: 01-01-2021, you remained willfully absent from your duty wef December 2019 to December 2020 (Complete one year) without proper permission/intimation or leave.
2. You were called by the SDEO concerned several times to resume your duty but you badly failed to comply.
3. You have drawn your salary illegally for one year without performing your duty.
4. The undersigned called you to this office via phone and directed you to resume your duty as a driver in this office, but you can't drive the vehicle, which shows that you have been appointed improperly.
5. You have been appointed on 09-08-2019 and you were on probation for one year but you couldn't prove yourself an efficient government servant.

You proved an inefficient, dishonest, negligent and subvert government official.

While going through the material on record, my personal observation and report of the SDEO Dassu, the allegations levelled against you, mentioned above, have been proved under the provisions of E&D Rules 2011.

As a result; thereof, I as the Competent Authority, have tentatively decided to impose upon you one or more penalties mentioned in Rule 4 (b), (i) to (iv) of the ibid Rules.

You are, therefore, required to show cause as to why major or minors penalty provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

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

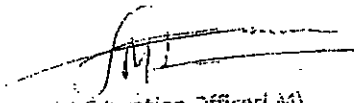
(Muhammad amin)  
District Education Officer (M)  
Kohistan Uprr.

Endorsement No. 5265-70


Dated: 15 / 01/2021.

Copies for information and necessary action forwarded to the:

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The PA to District Education Officer (M) Kohistan Upper.
4. The Sub Divisional Education Officer (M) Dassu, Kohistan Upper.
5. <sup>Sadar</sup> Sadar Khan Driver presently working in this office.
6. Copy to Master File for record.

  
District Education Officer (M)  
Kohistan Upper.

Acknowledgment: 1 Sadar Khan Driver received my copy.

Signature:  Date: \_\_\_\_\_

13407-9200891-1  
15/1/2021

20/01/2021  
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put up on file  
SDEO (M)  
17/01/2021  
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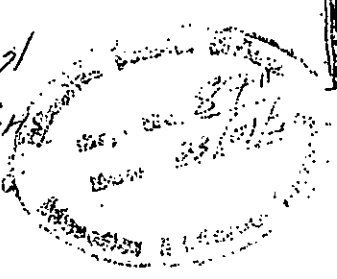
سید صاحب DEO حیدرآباد کوستان (ایس) سوال جواب سٹوڈنٹس

یہ کہ سائبر سٹوڈنٹس کو الیم 5265-70 تاریخ 15/01/2021

دفعہ 1 سے جاری ہے۔  
1۔ اگست 2019 تا دسمبر 2020 تک سائبر سٹوڈنٹس سے لے کر  
SDEO (M) ڈائریکشن آف آفس آنا رہا لیکن SDEO صاحب نے مایوسی اظہار میں  
ڈائریکٹر کو لکھی کہ وہ سائبر سٹوڈنٹس کو الیم سے خارج کر دے۔ اور وہ سائبر  
SDEO سے لے کر ڈائریکٹر کو لکھی کہ وہ سائبر سٹوڈنٹس کو الیم سے خارج کر دے۔  
2۔ یہ سائبر SDEO سے لے کر ڈائریکٹر کو لکھی کہ وہ سائبر سٹوڈنٹس کو الیم سے  
written کی آواز سے لے کر ڈائریکٹر کو لکھی کہ وہ سائبر SDEO سے لے کر ڈائریکٹر  
اسی ڈیوٹی کرتا رہا

1۔ میں سٹوڈنٹس کو الیم سے خارج نہیں کرتا۔ سٹوڈنٹس SDEO سے لے کر ڈائریکٹر  
یہ سٹوڈنٹس کو الیم سے خارج نہیں کرتا۔  
2۔ DEO سے لے کر ڈائریکٹر کو لکھی کہ وہ سائبر سٹوڈنٹس کو الیم سے خارج کر دے۔  
ڈائریکٹر سے درخواست ہے  
3۔ اگست 2019 سے لے کر ڈائریکٹر کو لکھی کہ وہ سائبر سٹوڈنٹس کو الیم سے  
سائبر سٹوڈنٹس کو الیم سے خارج کر دے۔

میرا ہاؤسنگ کو ملانے کے لئے سائبر سٹوڈنٹس کو الیم سے خارج کر دے۔  
اور سائبر سٹوڈنٹس کو الیم سے خارج کر دے۔  
SDEO سے لے کر ڈائریکٹر کو لکھی کہ وہ سائبر سٹوڈنٹس کو الیم سے  
سائبر سٹوڈنٹس کو الیم سے خارج کر دے۔



20/01/2021  
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AEO (AD)  
22-1-2021



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
KOHISTAN

Annexure  
E<sup>70</sup>



OFFICE ORDER:

1. Whereas Mr. Sadar Khan was appointed on the post of driver in the office of SDEO (M) Dassu on 09.08.2019
2. Whereas he was reported absent w.e.f December 2019 to December 2020 by the SDEO concerned, vide letter No.1227 dated 01.01.2021
3. Whereas he was called to this office to resume his duty as a driver, but it was observed that he could not drive the vehicle properly.
4. Whereas a show cause notice was served upon him vide this office order No.5265-70 dated 15.01.2021.
5. Whereas the accused driver confessed in his reply to show cause notice that he faces hardships in driving the vehicle.
6. Whereas the accused himself requested that he should be appointed as Naib Qasid/ Chowkidar.

Therefore, the undersigned, being the competent authority, after examining the detailed report and other record, is pleased to demote Mr. Sadar Khan, Driver BPS-06 to the post of Chowkidar BPS-03, as per his own request and post him against the vacant post of Chowkidar at GPS Seb with immediate effect in the interest of public service.

The then SDEO (M) Dassu is hereby held responsible for the drawing and disbursing of his illegal drawl of pay for his absent period.

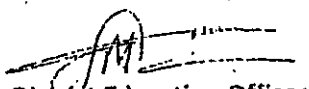
Necessary entries should be made in his service book to this effect.

Muhammad Amin  
District Education Officer  
(Male) Kohistan

Endstt: No. 5300-05 / Estt: Prr/A.Report/Show Cause/ Dated 30 / 1 / 2021.

Copy forwarded of the above is forwarded to the:-

1. PA to Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
2. Sub Divisional Education Officer (M) Dassu
3. District Accounts Officer Kohistan
4. Official concerned
5. PA to DEO Local office

  
District Education Officer  
Suy (Male) Kohistan

o/c



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G.H.S. Sec,  
Distt. Faisalabad

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Relieving Chit

In compliance the order of DEO  
(M) Upper Kohistan vide 1673-1711-dated  
14-04-2021, Mr. Sader Khan Chowkidar

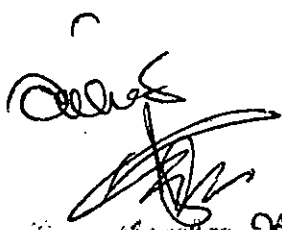
is hereby relieved from his duty as


Chowkidar at G.P.S. Seo to as Chowkidar  
Headmaster,

G.P.S. Seo to report his further

services as Mr. Sader Khan Chowkidar  
(newly appointed) has taken his charge

as Chowkidar at G.P.S. Seo vide 16-04-2021  
with same order and date.

  
S. Boucher,  
P.S. Seo,  
Upper Kohistan.

  
16/04/2021

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بابت ماہ مارچ سال 2021

GPS Security

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قومی کارڈ نمبر: 92-00891-1340  
 فون نمبر: 0890-1717822

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D-15-04-2021  
Assistant Sub divisional  
Liaison Education Officer (S.E.)  
Circle SEO Kandia

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20/01/2021  
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M 22-1-21

**OFFICE OF THE HEAD MASTER GHS SEO KOHISTAN**

No 5051 Dated 07/07/2021

To,

The District Education Officer  
(Male) Kohistan

Subject: **INFORMATION REGARDING SADAR KHAN CHOWKIDAR.**

Memo:

Reference your telephonic message on 07/07/2021 at 10:08AM on the subject cited above.

Mr. Sadar Khan has not been taken any charge as Chowkidar at GHS Seo up till now, hence the information is submitted for further necessary action please.

Head Master  
GHS Seo

07/07/2021

Annexure "J"  
OFFICE OF THE DISTRICT EDUCATION OFFICER (M) KOHISTAN (UPPER)

Email: emiskohistan@yahoo.com Phone Number. 0998407128

33

Statement of Allegations/ Show Cause Notice:

I, Muhammad Amin District Education officer (M) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency & Disciplinary, Rules 2011, do hereby serve upon you, Mr. Sadar Khan Chow GHS Seo this show cause notice as follows:-

1. As per report of Head Master GHS Seo vide No 5051 dated 07/07/2021, you remained willful absent from your duty w.e.f 14.04.2021 to 07/07/2021 without proper permission/intimation or leave
2. You were called by the Head Master concerned several times to resume your duty but you badly failed to comply.
3. Prior to this you had been absent from your duty w.e.f December 2019 to December 2020 vide SDEO Male report No.1227 Dated 01.01.2021
4. You were then demoted to the post of Chowkidar and you stated that on affidavit that you will perform your duty properly, but you violated your affidavit.

Thus you proved a non-punctual, inefficient, dishonest, and negligent and subvert government servant and you have committed the gross act/omissions of misconduct, inefficiency and subversion specified in Rule 3 of the mentioned rules.

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

You are, therefore, required to show cause as to why **major penalty of Removal from service**, provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

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

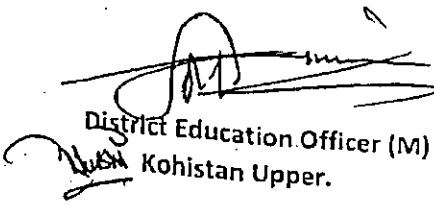
(Muhammad Amin)  
District Education Officer (M)  
Kohistan Upper.

Endorsement No. 4775-80

Dated: 26 / 07/2021.

Copies for information and necessary action forwarded to the:

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The PA to District Education Officer (M) Kohistan Upper.
4. The Deputy District Education Officer (M) Dasso, Kohistan Upper.
5. Mr. Sadar Khan Chow GHS Seo.
6. Copy to Master File for record.

  
District Education Officer (M)  
Kohistan Upper.

Annexure "K"

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OFFICE OF THE DISTRICT EDUCATION OFFICER (M) KOHISTAN (UPPER)

Email: emiskohistan@yahoo.com Phone Number: 0998407128

OFFICE ORDER/DISMISSAL FROM SERVICE

1. Whereas Mr. Sadar Khan Chowkidar GHS Seo remained willfully absent from his duty w.e.f 14-04-2021 to date, as per report of the headmaster concerned vide No.5051 dated 07-07-2021 without proper permission intimation or leave.
2. Whereas as he was called to resume his duty, time and again by the Head Master concerned but he badly failed to comply.
3. Whereas prior to this he had been absent from his official duty as a driver w.e.f December 2019 to December 2020 as per report of SDEO Male Dassa vide his letter No.1227 dated 01-01-2021
4. Whereas he was demoted to the post of Chawkidar at GPS Seo vide this office order No. 5600-05, Dated: 30-01-2021, where he remained irregular to perform his duty
5. Whereas he was transferred to GHS Seo vide this office order No 1673-1711, Dated: 14-4-2021, but still he remained absent and did not comply the departmental order
6. Whereas a show cause notice was served upon him vide this office order No. 4775-80, Dated: 26-7-2021 which was delivered to him vide his proper acknowledgement and dated signature
7. Whereas he badly failed to reply to the show cause within stipulated time.
8. He badly failed to avail the chance of personal hearing
9. Whereas while going through the material on record and personal observations of the undersigned, all the charges/allegations levelled against him have been proved to the full satisfaction of the undersigned

Therefore the undersigned being the competent authority, do hereby impose Major Penalty of Dismissal from Service, upon Mr. Sadar Khan Chawkidar GHS Seo, Kohistan Upper under Rule 4(1) (IV) of F&S Rules 2011, with immediate effect, in the interest of public service.

(MUHAMMAD AMIN)  
District Education Officer (M)  
District Kohistan Upper.

Ord No. 7547-SS DEO (M) Kohistan Esttab: Sec: Dated: 3 /11/2021

Copy for information and necessary action forwarded to:

1. The PA to Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
2. The Deputy Commissioner Kohistan Upper
3. The District Accounts Officer Kohistan Upper.
4. The PA to District Education Officer (M) Kohistan Upper
5. The Deputy District Education Officer (M) Kohistan Upper
6. The B&AO local office to stop the pay of the concerned teacher immediately
7. The Headmaster GHS Seo
8. The Ex Chawkidar, Mr. Sadar Khan GHS Seo
9. Copy to Master File for record

District Education Officer (M)  
District Kohistan Upper.

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