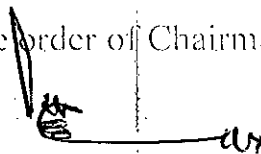


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - \_\_\_\_\_

800/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/04/2023	<p>The appeal of Syed Bilal Shah resubmitted today by Mr. Wajid Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 11.04.2023.</p> <p>By the order of Chairman</p>  REGISTRAR


This is an appeal filed by Syed Bilal Shah today on 16/12/2022 against the order dated 12.11.2022 against which he made/preferred departmental appeal/representation on 25.11.2022 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 report 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 is not signed by the appellant.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Annexures of the appeal are unattested.
- 4- Annexures of the appeal are not attached in sequence.

No. 3693 /ST,

Dt. 19/12 /2022.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Wajid Khan Adv.  
High Court Pesh.

*R/sir*

*Re Submitted after removal of  
all legal objections.*

*adv*

BEFORE THE HONOURABLE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PUKHTUNKHWA, PESHAWAR

Service Appeal No 800 /2022

Syed Bilal Shah.....(Appellant)

V E R S U S

Director Elementary & Secondary Education etc....(Respondents)

I N D E X

S.NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE
1.	Grounds of Appeal with Affidavit	-	1-6
2.	Application for stay with affidavit	-	7-9
3.	Addresses of the parties	-	10
4.	Copy of the appointment order	'A'	11-13
5.	Copy of the application/letter by the PTC Chairman Teacher Council and elders of the locality	'B'	14-18
6.	Copy of the show cause	'C'	19-23
7.	Copy of the reply	'D'	24
8.	Copy of the order dated 12-11-2022	'E'	25-27
9.	Copy of the appeal to DEO	'F'	28
10.	Copy of the application	'G'	29-30
11.	Wakalat Nama (In original)	-	31

Appellant

Through:

(WAJID KHAN)  
Advocate,  
High Court, Peshawar  
Cell # 0300-5980225

Dated: -14-12-2022

①

BEFORE THE HONOURABLE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PUKHTUNKHWA, PESHAWAR

Service Appeal No 800 / 2022

Syed Bilal Shah (PST) Government Primary School Manakaro  
Tehsil and District Peshawar.....(Appellant)

V E R S U S

1. Director Elementary and Secondary Education (Male) Khyber  
Pakhtunkhwa, Peshawar
2. District Education Officer (Male) District Peshawar
3. Sub Divisional Education Officer (Male) Town-III, Peshawar
4. Head Teacher Government Primary School Manakaro  
Peshawar.....(Respondents)

Appeal U/S 4 of Khyber Pakhtunkhwa Service  
Tribunal Act, 1974 against the transfer order  
Endst No 3962-661 dated 12-11-2022 passed by  
Respondents No 2, the Appellant was  
transferred from Government Primary  
School Manakaro, Peshawar to Government  
Primary School No 4 Bazid Khel, Peshawar

PRAYER IN APPEAL:-

On acceptance of this Service Appeal, the order Endst No  
3962-661 dated 12-11-2022 passed by Respondents No 2  
may graciously be set aside and the Appellant may kindly  
be retained at GPS Manakaro Peshawar.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

- 1) That through the instant appeal, the Appellant humbly seeks, indulgence of this Honourable Tribunal for setting aside transfer order dated 12-11-2022.
- 2) That succinctly stated facts giving rise to the filing of instant appeal are that the Appellant was selected as PST Teacher on 26-08-2017 in Education Department. (Copy of the appointment order is attached as Annex 'A').
- 3) That after appointment, the Appellant performed his duty with full zeal devotion in Government Primary School Manakaro, Peshawar; but unfortunately, the Respondent No 4 submitted a complaint against the Appellant regarding his misbehavior. (Copy of the application/letter by the PTC Chairman Teacher Council and elders of the locality are attached as Annex 'B').
- 4) That thereafter, the Respondent No 3 called an explanation from Appellant vide No 1104 dated 24-11-2022. (Copy of the explanation is attached as Annex 'C').
- 5) That on the direction of Respondent No 2, an inquiry officer was appointed as Inquiry Officer, whereby he conducted one sided inquiry without giving right of audience to the Appellant and submitted his baseless

3

- 6) That the Appellant submitted his written reply of the explanation. (Copy of the reply is attached as Annex 'D').
- 7) That the Appellant was shocked on his transfer from Government Primary School Manakaro Peshawar to Government Primary School No 4 Bazid Khel Peshawar. (Copy of the order dated 12-11-2022 is attached as Annex 'E').
- 8) That the impugned transfer order passed sheer violation of law laid down in KPK Regulatory Act, 2011; it is pertinent to mention here that the Appellant filed department appeal against the said proceedings to Respondent No 1 on dated 25-11-2022. (Copy of the application is attached as Annex 'F').
- 9) That the Appellant having no other adequate remedy for redressal of his grievance, the Appellant seeks indulgence of this Honourable Tribunal for appropriate direction/order to Respondents on the following grounds inter-alia:-

GROUND:-

- A) That the Appellant is the natural born citizen of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That the fundamental rights of the Appellant have blatantly violated by the Respondents and the Appellant have been discriminated and has been denied his due rights

under the Constitution of Islamic Republic of Pakistan, 1973.

- C) That this Honourable Court has in a number of judgments allowed the cases of similarly nature, however, the Respondents are depriving the Appellant from his fundamental rights.
- D) That the Appellant also moved an application to the concerned authorities to conduct impartial inquiry to dig out the actual facts. (Copy of the Application is attached as Annex 'G').
- E) That once of the celebrated right to earn livelihood through lawful means is a basic fundamental right guaranteed not only by the constitution of the modern world but rather has a backing history spread over immemorial time in the stateless and even in the mediaeval ages. The Appellant seeks to enforce his said right and to remain peaceful citizen of the society in this modern era of globalization.
- F) That the impugned order is against the norms of justice, illegal, unconstitutional and without authority, therefore, not tenable.
- G) That the action of the Respondent of transferring the Appellant from home village/town is against the rules and regulations and polices applicable to the matter and as such against all the norms of justice.

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- H) That this Honourable Tribunal has got vast and ample powers to entertain the instant appeal.
- I) That Counsel for the Appellant may graciously be allowed to raise additional grounds at the time of arguments.

PRAYER:-

It is, therefore, most respectfully prayed that on acceptance of this Appeal, the order Endst No 3962-661 dated 12-11-2022 passed by Respondents No 2 may graciously be set aside and the Appellant may kindly be retained at GGPS Manakaro Peshawar.

Any other relief, which this Honourable Tribunal deems proper in the circumstances of the appeal may also be granted in favour of Appellant.

Appellant

Through:

~~\_\_\_\_\_~~  
(WAJID KHAN)  
Advocate,  
High Court Peshawar

Dated: -14-12-2022

REFERENCE:-

2003 PLC (CS) 983 SC

KPK (Transfer, Posting Promotion) Regulatory Act, 2011

NOTE:-

No such service appeal for the same Appellant has earlier been filed by me before this Honourable Tribunal prior to instant one.

~~\_\_\_\_\_~~  
Advocate



(6)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

Syed Bilal Shah.....(Appellant)

V E R S U S


Director Elementary & Secondary Education etc....(Respondents)

AFFIDAVIT

I, Syed Bilal Shah (PST) Government Primary School Manakaro Tehsil and District Peshawar, do hereby solemnly affirm and declare on oath that all the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.

DEPONENT \_\_\_\_\_  
CNIC # 17301-9741695-9  
Cell # 0318-9078029

Identified by:-

  
(WAJID KHAN)  
Advocate  
High Court, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

7

Misc Application No \_\_\_\_\_ /2022

In Re:

Service Appeal No \_\_\_\_\_ /2022

Syed Bilal Shah (PST) Government Primary School Manakaro  
Tehsil and District Peshawar.....(Appellant)

V E R S U S

1. Director Elementary and Secondary Education (Male) Khyber  
Pakhtunkhwa, Peshawar
2. District Education Officer (Male) District Peshawar
3. Sub Divisional Education Officer (Male) Town-III, Peshawar
4. Head Teacher Government Primary School Manakaro  
Peshawar.....(Respondents)

Application for grant of temporary injunction to the effect  
that the impugned order dated 12-11-2022 may kindly be  
set aside and the Respondents may kindly be directed not  
to take adverse action against the Applicant/Appellant  
till the final disposal of the enclosed service appeal

Respectfully Sheweth:-

- 1) That the Applicant/Appellant is filing service appeal against  
the impugned order dated 12-11-2022 before this  
Honourable Tribunal, in which no date has yet fixed.

- 2) That the Applicant/Appellant feeling aggrieved from the impugned order dated 12-11-2022; now approaches this Honourable Tribunal for the setting aside the said order.
- 3) That prima facie, the Applicant/Appellant is sanguine of success of his appeal on merits and by service.
- 4) That balance of convenience is also favours the Applicant/Appellant.
- 5) That the Appellant/Appellant status quo is not granted and would give birth to new litigation.
- 6) That others grounds will be raised at the time of arguments with the permission of this Honourable Court.

It is therefore, humbly prayed that on acceptance of the instant application, the impugned order dated 12-11-2022 may kindly be set aside and the Respondents may graciously be directed not to take adverse action against the Applicant/Appellant.

Applicant/Appellant  
(Syed Bilal Shah)

Through:

~~\_\_\_\_\_~~  
(WAJID KHAN)  
Advocate,  
High Court, Peshawar

Dated:-24-08-2020

9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Misc Application No \_\_\_\_\_ of 2022

In Re:

Service Appeal No \_\_\_\_\_/2022


Syed Bilal Shah.....(Appellant)

VERSUS


Director Elementary & Secondary Education etc....(Respondents)

AFFIDAVIT

I, Syed Bilal Shah (PST) Government Primary School Manakaro Tehsil and District Peshawar, do hereby solemnly affirm and declare on oath that all the contents of accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.

  
DEPONENT  
CNIC # 17301-9741695-9  
Cell # 0318-9078029

Identified by:-

  
(WAJID KHAN)  
Advocate  
High Court, Peshawar

10

BEFORE THE HONOURABLE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PUKHTUNKHWA, PESHAWAR

Syed Bilal Shah.....(Appellant)

VERSUS

Director Elementary & Secondary Education etc....(Respondents)

MEMO OF ADDRESSES

APPELLANT

Syed Bilal Shah (PST) Government Primary School Manakaro  
Tehsil and District Peshawar

RESPONDENTS

1. Director Elementary and Secondary Education (Male) Khyber  
Pakhtunkhwa, Peshawar
2. District Education Officer (Male), District Peshawar
3. Sub Divisional Education Officer (Male) Town-III, Peshawar
4. Head Teacher Government Primary School Manakaro  
Peshawar

Through: Appellant

~~\_\_\_\_\_~~  
(WAJID KHAN)  
Advocate,  
High Court, Peshawar

Dated: -14-12-2022



# District Education Officer (Male) Peshawar

ANNEX A

PH# 091-9331337, 9225397  
Fax# 091-9331337

(11)

## APPOINTMENT:

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates is hereby ordered against the post of Primary School Teacher School based in BPS-12 (Rs.13320-960-42120) @ Rs. 13320/- fixed plus usual allowances as permissible under the rules on adhoc basis on Contract under the existing rules/policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from 5<sup>th</sup> September, 2017: -

### Open quota

Union Council	Name	Father Name	School Name	CNIC	Total Marks	Remarks
Achini Bala	MUHAMMAD SALEEM	MUHAMMAD NAWAZ KHAN	GPS Haji banda	17301-2484542-7	121.99	Against Vacant Post
Achini Bala	AKBAR ALI SHAH	MUHAMMAD AYAZ KHAN	GPS Dora Bazar	17301-6598922-3	116.60	Against Vacant Post
Adezai	WAQAR UL MULK	ALMAS KHAN	GPS No.1 Adezai	17301-2346083-6	119.74	Against Vacant Post
Adezai	SHAFI ULLAH	GUL FARAZ	GPS Khandaq Adezai	17301-1584288-5	102.49	Against Vacant Post
Adezai	FIAMID ULLAH	MUHAMMAD JAMIL	GPS No.1 Adezai	17301-7839902-1	102.47	Against Vacant Post
Akhone abad	ASIF	MUHAMMAD YOUNAS	GPS Beri Bagh	17301-0215665-7	83.60	Against Vacant Post
Asia	SAEED KHAN	GUL MUHAMMAD	GPS No.1 Asia Park	17301-4593721-9	121.57	Against Vacant Post
Asia	UMAR DARAZ	MUHAMMAD SHAFIQ	GPS Asia Gate	17301-1323380-9	104.95	Against Vacant Post

Union Council	Name	Father Name	School Name	CNIC	Total Marks	Remarks
Lahori	NAVEED KHAN	ELHAM UD DIN	GPS Takia Singhan	17301-8379176-7	106.37	Against Vacant Post
Lala	RAB NAWAZ KHAN	MUHAMMAD MISKEEN KHAN	GPS Tember Pura	17301-5254913-7	121.87	Against Vacant Post
Lala	KARIM ULLAH	FATHI KHAN	GPS Tember Pura	17301-2539732-5	120.22	Against Vacant Post
Lala	UMAIR AHMAD JAVED	NAFEES AHMAD JAVED	GPS No.1 Lala	17301-6209574-5	115.08	Against Vacant Post
Lala	ATTA ULLAH SHAH	SYED AHMAD SHAH	GPS Tember Pura	17301-7732953-1	112.90	Against Vacant Post
Landi Arbab	MUHAMMAD SULEMAN	SAFI ULLAH	GPS Manakrao	17301-5757351-3	114.27	Against Vacant Post
Landi Arbab	SAFI ULLAH	MIR NAWAZ KHAN	GPS Swali Gate	17301-1870206-1	111.75	Against Vacant Post
Landi Arbab	RIAZ GUL	MUNAF GUL	GPS No 2 Charkha Khel	17301-6532089-7	110.27	Against Vacant Post
Landi Arbab	FAZAL HADI	SHAH JEHAN	GPS Manakrao	17301-1272481-3	109.26	Against Vacant Post
Landi Arbab	SYED BILAL SHAH	SYED LAL SHAH	GPS Manakrao	17301-9741695-9	106.31	Against Vacant Post
Landi Arbab	HAYAT KHAN	HAYA KHAN	GPS Swali Gate	21201-8705976-3	99.68	Against Vacant Post
Landi Arbab	NASEER AHMAD	KHALO KHAN	GPS No 2 Charkha Khel	17301-4891856-7	96.42	Against Vacant Post
Landi Arbab	SAJJAD AKHTAR	SHAHEEN SHAH	GPS Swali Gate	17301-3193274-7	93.93	Against Vacant Post
Landi Arbab	OAZI SHEHZAD ULLAH	OAZI SAHIB ULLAH	GPS Manakrao	17301-2972304-3	93.77	Against Vacant Post

TERMS & CONDITIONS.

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1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on adhoc & contract basis initially for one year.
4. Appointment is subject to the condition that the certificates/degrees must be verified from the concerned authorities by Office of the Sub Divisional Education Officer (Male) concerned. Anyone found producing bogus Documents / Testimonials will be reported to the law enforcing agencies for necessary action.
5. Their services are liable to termination on one month notice from either side. In case of resignation with notice their one-month pay/allowances shall be forfeited to the Government.
6. Pay release order will be issued by this office after verification of all documents by SDEO Male Town Concerned.
7. They should join their post within one month from the issuance of this appointment order, failing which, the appointment will expire automatically and no subsequent appeal etc shall be entertained.
8. They will be entitled to draw pay with effect from 5<sup>th</sup> September, 2017.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge they will sign an agreement with the Department, otherwise their order will not be valid.
11. They will be governed by such rules and regulations as may be issued from time to time by the Government.
12. Their services shall be terminated at any time in case their performance is found unsatisfactory during the contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
13. Their appointment is School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
14. Before handing over charge once again their documents/testimonials may be checked if they have not the required qualification they may not be handed over charge.

(Note): PSIT/ASDEOs concerned are directed to verify this order from the Office of the SDEO (M) Town concerned before handing over charge to the officials.


(JADDI KHAN KHALIL)  
DISTRICT EDUCATION OFFICER  
(MALE) PESHAWAR

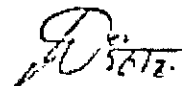
Enclst: No. 1950-2321

Dated Peshawar the 26/8 /2017.

Copy forwarded for information and necessary action to:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Peshawar
3. District Monitoring Officer Peshawar
4. PA to the Director ESSE Khyber Pakhtunkhwa, Peshawar.
5. PA to District Education Officer (Male) Peshawar
6. SDEOs Male, Town-I, II, III, IV Peshawar.
7. ASDEOs Circles Concerned
8. Officials Concerned.
9. M/File

  
Deputy District Education Officer  
(Male) Peshawar





ANX B

QUESTIONER TO BE SERVED UPON SAYED BILAL SHAH PST GPS MANAK RAO PESHAWAR.

No 123/ S.Bial Shah/complaint/DEO

dated: 05/07/2022

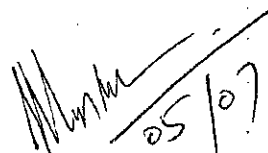
(14)

In pursuance of the DEO(M) Peshawar Notification Endst: No8618-19/Absent Report T-III dated 30/06/2022, the below questioner is to be served for the reply with in two days after the receipt of this questioner.

1. Your Complete Name: SYED BILAL SHAH
2. Post with BPS. PST - BPS-12
3. Qualification. B.S Zoology + M.A PASHTO + PTC, CT, B.E
4. Date of appointment 26-08-2017
5. Tenure in the present school 4 Years, 11 Months
6. Class to which you teach. 3rd
7. Is it true that you are Habitual latecomer? YES/NO  No
8. Is it true that you violate the rules of the govt: established for the school? Yes/No  No
9. Is it true that you always give corporal punishment to students? Yes/No  No
10. Is it true that you have no interest in the school activities? Yes/No.  No
11. Any other comments/remarks/explanation/clarification, if you have.

Respected Sir,

It is stated that all the charges are totally baseless and is based on malafide intention.

  
05/07/2022

Janas Khan

/0

Principal, GHS Dehbadur, Peshawar

بمضور جناب انكوارى آفيسر / پرنسپل گورنمنٹ ہائی سکول دیہہ بہادر پشاور

(15)

جناب عالی!

نہایت ادب کے ساتھ عرض ہے کہ گورنمنٹ پرائمری سکول منکراؤ کے ٹیچر سید بلال شاہ صاحب نہایت ہی قابل اور محنتی شخص ہے۔ اپنی ڈیوٹی مکمل دیاننداری اور ایمانداری سے انجام دے رہا ہے۔ وقت کی پابندی خود بھی کرتا ہے اور بچوں کو بھی تلقین کرتے ہیں۔ نہایت ہی مہارت اور باکمال طریقے سے پڑھاتے ہیں اور بچوں اور بڑوں سے محبت اور شفقت سے پیش آتے ہیں۔ میں بحیثیت چیئرمین پی ٹی سی کونسل گورنمنٹ پرائمری سکول منکراؤ پشاور ان کی کارکردگی سے پوری طرح مطمئن ہوں۔

العارض

غلام مرتضیٰ

چیئرمین پیرنٹس ٹیچرز کونسل

گورنمنٹ پرائمری سکول منکراؤ پشاور

رابطہ نمبر: 0345-9394202

بخدمت جناب انکوآری آفیسر / پرنسپل گورنمنٹ ہائی سکول دیہہ بہادر پشاور

16

جناب عالی!

ہم تصدیق کرتے ہیں کہ گورنمنٹ پرائمری سکول منکراؤ کے ٹیچر سید بلال شاہ صاحب ایک بہترین معلم ہے، جو سکول اور بچوں کے فلاح و بہبود کیلئے ہمہ وقت کوشاں رہتا ہے۔ سکول کے نصابی سرگرمیوں کے ساتھ ساتھ غیر نصابی سرگرمیوں میں بھی بڑھ چڑھ کر حصہ لیتا ہے۔ نہایت ہی خوشگوار اور دوستانہ ماحول میں بچوں کو پڑھاتے ہیں، ان کی نگرانی میں ہمارے بچوں میں کافی مثبت تبدیلیاں آئی ہیں کیونکہ شاہ صاحب پرانے روایتی انداز میں نہیں بلکہ آجکل کے جدید اور اعلیٰ پائے کے پرائیویٹ سکولوں میں رائج شدہ نظام تعلیم کے طرز پر پڑھاتے ہیں۔ نالائق طلباء کو سزا دینے کی بجائے پیار محبت اور اخلاقی طور پر سمجھاتے ہیں، جسکی وجہ سے نہ صرف انکے اپنے کلاس کے طلباء بلکہ پورے سکول کے طلباء انہیں پسند کرتے ہیں اور انہیں اپنا آئیڈل مانتے ہیں۔ ڈیوٹی اوقات کی مکمل پابندی کرتے ہیں اور اپنے پیشے سے بہت متعلق ہیں۔ غیر ضروری چھٹیوں سے مکمل گریز کرتے ہیں حتیٰ کہ پچھلے کئی سالوں سے کبھی بھی غیر ضروری طور پر سکول سے غیر حاضر نہیں ہوئے اور یہی وجہ ہے کہ حاضری رجسٹر میں انکی "کیجول لیوز" نہیں کے برابر ہیں۔

بلال شاہ صاحب ہمارے فخر ہیں، ہم سب دعا گو ہیں کہ اللہ تعالیٰ انکو زندگی میں بہت سی خوشیاں اور کامیابیاں نصیب فرمائیں۔

آپکے خیر خواہ

KHAIR

خیر محمد، ممبر پی ٹی سی کونسل جی پی ایس منکراؤ، موبائل نمبر: 0311-9143208

فہم

فضل قدیم، ممبر پی ٹی سی کونسل جی پی ایس منکراؤ، موبائل نمبر: 0312-3139699

محمد ابو بکر قاسمی

محمد ابو بکر قاسمی، ممبر پی ٹی سی کونسل جی پی ایس منکراؤ / جزل کونسل، موبائل نمبر: 0334-1916543

M. HAMMAD ABUBAKAR QASMI  
General Counsel NC-80  
Landi Arbab-2

حاجی فرید اللہ  
نائب ناظم  
نیبر ہوڈ کونسل 03 لنڈی ارباب پشاور

حاجی فرید اللہ، نائب ناظم، موبائل نمبر: 0300-5995464

کریم اللہ

کریم اللہ، سینئر پی ایس ٹی، جی پی ایس منکراؤ، موبائل نمبر: 0345-9139291

محمد سلیمان

محمد سلیمان، پی ایس ٹی، جی پی ایس منکراؤ، موبائل نمبر: 0315-9088875

نعمان

نعمان، پی ایس ٹی، جی پی ایس منکراؤ، موبائل نمبر: 0323-9266689

ملک نیاز

ملک نیاز، چوکیدار، جی پی ایس منکراؤ، موبائل نمبر: 0300-5884929

ملک سرانجام خان، انچارج، ڈپٹی سٹنڈرٹ، جی پی ایس منکراؤ، موبائل نمبر: 0333-9346148

ملک سرانجام خان

**OFFICE OF THE DISTRICT EDUCATION OFFICER,**

**CAUSE NOTICE.**

I, (Mr. Sajjad Akhtar, DEO (M) Peshawar), as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you, Mr. Syed Bilal PST GPS Manak Rao Peshawar as follow:

I am satisfied that you have committed the following acts/omissions specified in rule 3 of the said rules:

- a) Non co-operation with the school administration.
- b) Violation of school discipline.
- c) Involved in corporal punishment to students.

As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty under rule 4 of the said rules.

You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whither you desire to be heard in person.

If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

COMPETENT AUTHORITY  
DISTRICT EDUCATION OFFICER,  
(Male) PESHAWAR.

(17)



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.**

No. 5837 / Absent Rpt T-III  
Dated 18/08 /2022

To,

The SDEO,  
(Male) Town-III Peshawar.

Subject

SHOW CAUSE NOTICE.

Memo:

I am directed to refer to the subject cited above and to enclose please find herewith show cause notice (in-duplicate) in r/o Mr. Syed Bilal Shah PST, GPS Manak Rao Peshawar to serve upon the above named official through register AD immediately under intimation to this office.

Encl: As above.

Dy: District Education Officer,  
(Male) Peshawar.

*[Handwritten signature]*

*DA/M. Ali*  
*Part of Comd CMSPED*  
*Teacher meeting*

*Forwarded to ADEO (M)*  
*circle call.*  
*19/8/22*

*File capture by*  
*armed Teacher*

*19/08/22/Received*

To

The District Education Officer (Male)

Peshawar.

Subject: Letter to Respond to Show Cause Notice No: 5837/Absent Rpt T-III

19

Dear Sir!

I am writing in reply to the show cause notice served to me that I have failed to perform my duty as expected and has committed the following mistakes:

- a) Non co-operation with the school administration
- b) Violation of school discipline
- c) Involved in corporal punishment to students

The above mentioned charges levelled against me are baseless on the following ground:

- a) Non-Co-operation with school administration:

I wholeheartedly and fully co-operated with the staff and head teacher in day to day school matters like preparation of documents regarding to staff and school on computer, dealing with polio teams, repairing electric boards, distributing free notebooks among orphans and poor students with the help of rich people in the locality and maintaining first aid box in case of emergency for dressing students wounds etc. I am fully participating in curricular, co-curricular and social activities in the school. (Pictures attached)

- b) Violation of school discipline:

Being a well qualified and belonging to a respectable family I always respect and obey the rules and regulations of the school and department. I am not considering myself a perfect being but being a sensible and responsible teacher, I try my level best to keep myself aware of how to be disciplined and how to maintain discipline inside the school premises.

- c) Involvement in corporal punishment to students:

The said allegation is also baseless and is based on malafide intention; there is no evidence of any complaint against me that is registered from parent's side to the circle office or school that I have punished the students, even nothing of the department is on record for such charges. According to the national slogan "مار نہیں پیار", is my priority to deal the students.

I have not been served any explanation/warning by the head teacher/circle office which shows that these allegations are baseless.

It is therefore requested that I may kindly be exonerated of the charges levelled against me.

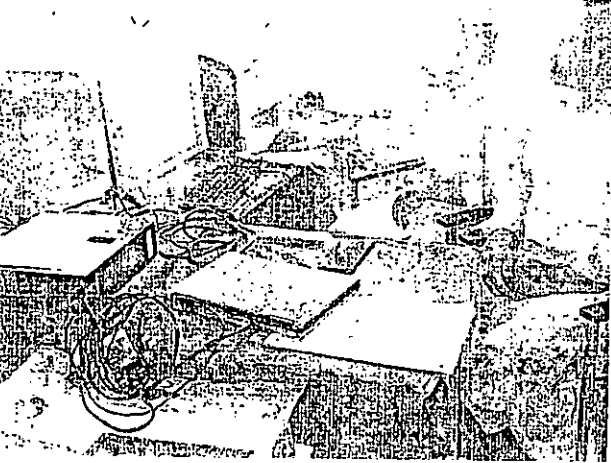
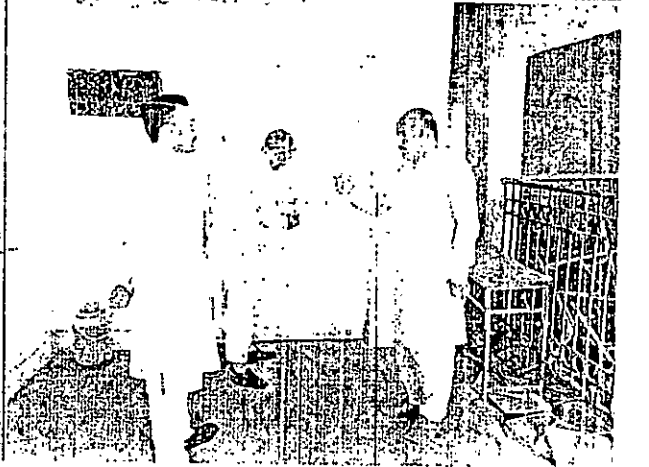
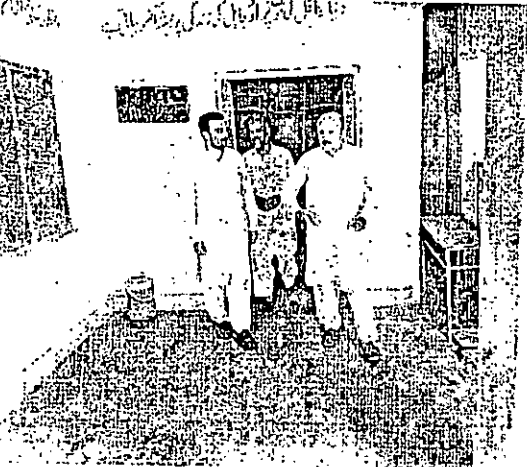
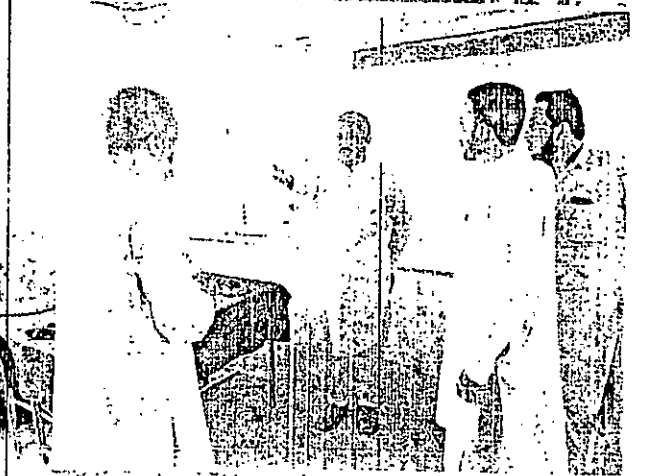
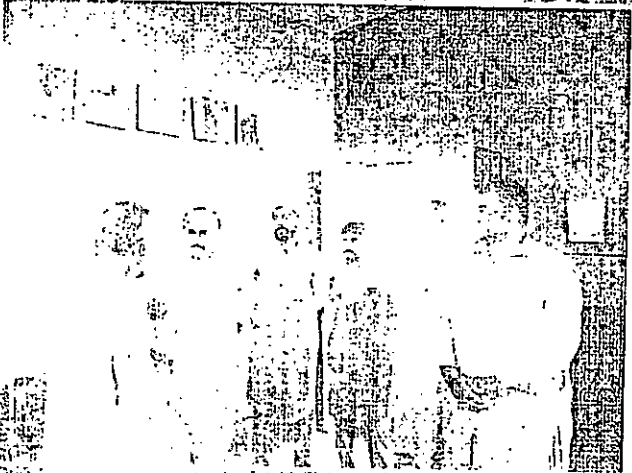
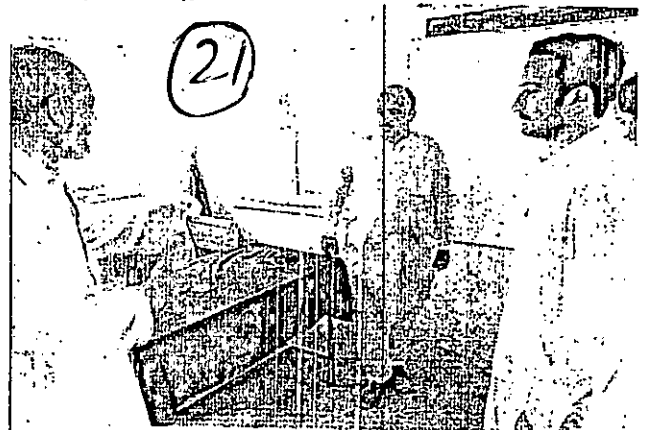
Thanks

Your's sincerely  
Syed Bilal Shah, PST  
GPS Manakrao Peshawar  
Dated: 31/08/2022

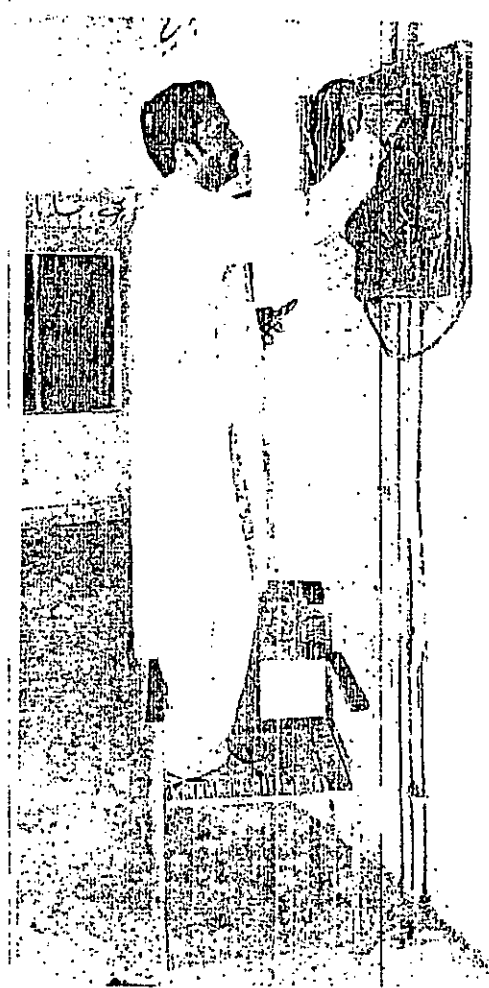
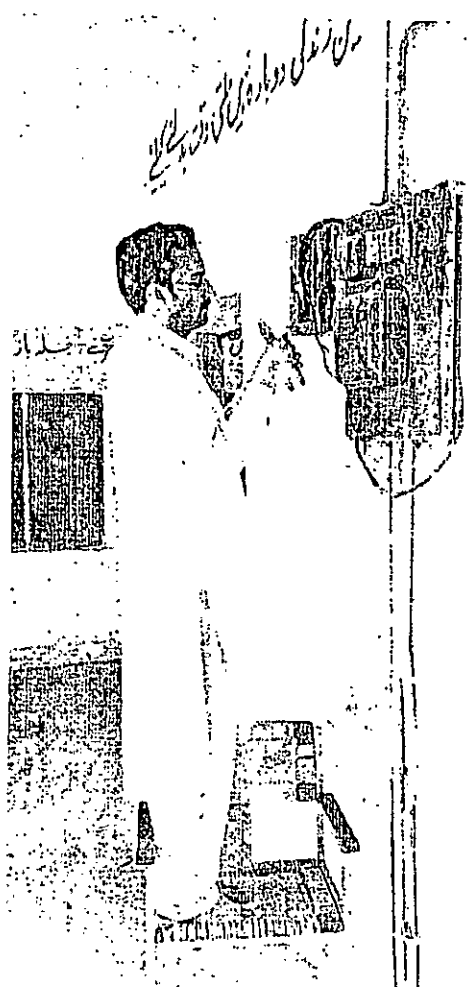
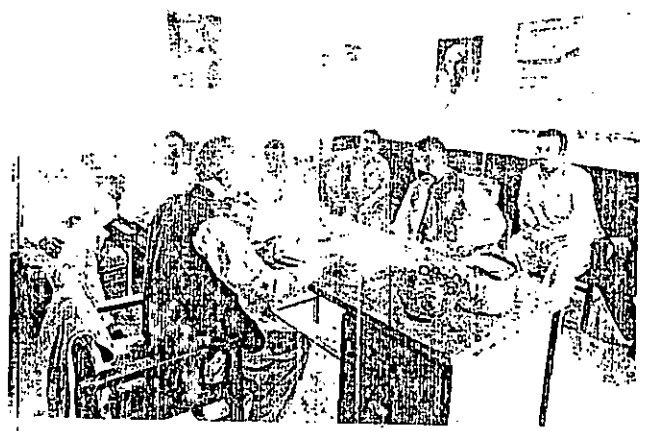
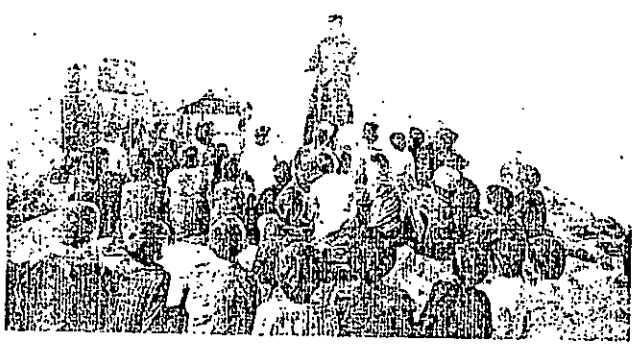
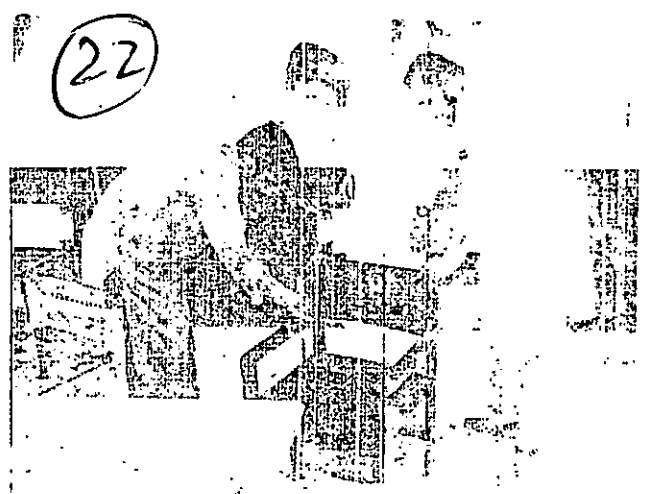
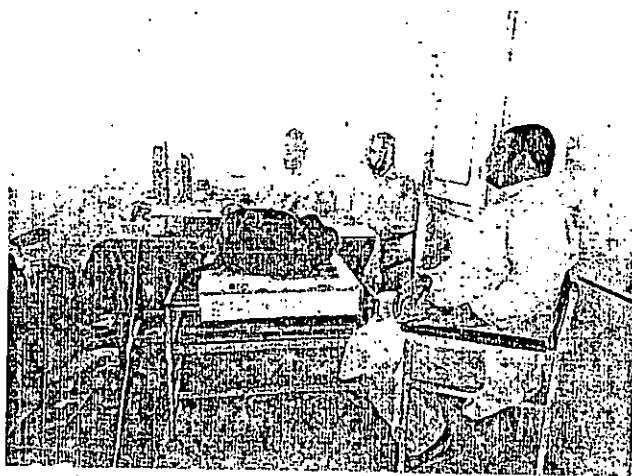
1184 Diary  
Received  
1-11-22

20









محضو، جناب ڈسٹرکٹ انجکشن آفیسر مردانہ پشاور

(23)

جناب عالی!

مؤدبانہ التماس ہے کہ سائل جی پی ایس منسٹراؤ پشاور میں بطور پرائمری سکول ٹیچر کام کر رہا ہے۔ سائل کے خلاف مذکورہ سکول کے ہیڈ ٹیچر نے حقائق سے بیٹ کر ایک شکایت متعلق دفتر میں جمع کروائی تھی جس پر علاقہ مکینوں کے چھلے دستخط جمع نام اور موبائل نمبر خود درج کروائے تھے، بعد ازاں اس پر جالس خان صاحب پرنسپل GHS دیہہ ہمدان کی نگرانی میں انکو منعقد کی گئی لیکن انہی انکوآٹری میں درخواست گزاران سے موقف کو دیکھاڑ کیے بغیر اور درخواست کے حقیقی یا غیر حقیقی ہونے کی تصدیق کیے بغیر انکوآٹری آفیسر نے رپورٹ مرتب کر کے جمع کرادی جسکی بناء پر سائل کے خلاف کارروائی کی جارہی ہے جو کہ سراسر نا انصافی اور زیادتی ہے۔ لہذا آپ صاحب سے التماس ہے کہ مذکورہ کیس کی دوبارہ غیر جانبدارانہ منصفانہ اور شفاف انکوآٹری کروائیں تاکہ سائل کی حق تلفی اور دل آزاری نہ ہو سکے۔

العارض  
آپ کا خادم  
سید بلال شاہ

DED-M  
D.#  
1588  
05/11/2022

Director  
SSS  
07/11/2022

جی پی ایس منسٹراؤ پشاور  
346-9078029

کاپی برائے ضروری کارروائی:  
ڈائریکٹر ایلیمنٹری اینڈ سیکنڈری انجکشن غیر محضو

(24)

اقرارنامہ / تحریری وضاحت بابت لا تعلقی شکایت بر خلاف سید بلال شاہ پی ایس ٹی جی پی ایس منکر او پشاور

میں مسٹی میاں راج محمد ولد میاں نیاز محمد سکنہ ریحان آباد، مشین گھڑی، لنڈی ارباب، ڈاکخانہ خاص تحصیل و ضلع پشاور  
بقائمی ہوش و حواس خمسہ یہ اقرار کرتا ہوں کہ میں نے جی پی ایس منکر او کے کسی بھی ملازم کے خلاف بلا واسطہ یا بلا واسطہ  
کسی قسم کی کوئی تحریری شکایت درج نہیں کرائی ہے۔ میرے علم میں یہ بات آئی ہے کہ میرے نام، موبائل نمبر اور  
جعلی دستخط سے مذکورہ سکول کے ایک ٹیچر سید بلال شاہ صاحب کے خلاف ایک جعلی شکایت ڈسٹرکٹ ایجوکیشن آفیسر  
مردانہ پشاور کے دفتر میں زیر گردش ہے جس سے میں قطعی طور پر لاعلم ہوں اور جس سے میرا کوئی تعلق نہیں ہے۔  
لہذا اس اقرارنامے اور تحریری وضاحت کے ذریعے میں کسی بھی قسم کی شکایت سے لا تعلقی کا اظہار کرتا ہوں۔

03/11/2022

میاں راج محمد ولد میاں نیاز محمد

ساکن ریحان آباد، مشین گھڑی، لنڈی ارباب، ڈاکخانہ

خاص تحصیل و ضلع پشاور

شناختی کارڈ نمبر: 17301-4274434-9

موبائل نمبر: 0314-9122037

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR**

(25)

**OFFICE ORDER**

Mr. Syed Bilal Shah, PST GPS Manakrao Peshawar is hereby adjusted at GPS No.4 Bazid Khel Peshawar as per proposal by the SDEO concerned due to misbehavior with the PSHT in his own pay and BPS the interest of public service with immediate effect.

**Note:-**

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

District Education Officer  
(Male) Peshawar.

Endst No: 3962-661

Dated 19/11/2022

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Education Monitoring Authority (EMA/IMU) Peshawar
3. SDEO(M) Town-III Peshawar w/r to his letter No. 1014 dated 01-11-2022.
4. ASDEO (M) Circle Concerned.
5. Official Concerned.

District Education Officer  
(Male) Peshawar

7  
خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (میل) پشاور

عنوان: اپیل پیراد منسوخی ٹرانسفر آرڈر نمبر 3962-661 بناگ سید بلال شاہ PST  
12-11-2022

(26) جناب عالی

سودبان التماس ہے کہ سائل کا ٹرانسفر آرڈر نمبر 3962-661 آپ  
صاحبان سے بحورفہ 12 نومبر 2022 کو جی پی ایس سنکراؤٹ سے  
جی پی ایس بازیر خیل نمبر 4 کو کیا تھا جہاں پر سائل کا خاندانی  
عداوتی مسئلہ کئی عرصے سے چلا آ رہا ہے، جو کہ سائل کے  
سائل کا سبب بنا سکتا ہے

لہذا آپ صاحبان سے گزارش ہے

کہ سائل کا ٹرانسفر آرڈر نمبر 3962-661 بناگ سید بلال شاہ  
سے منسوخی کے احکامات جاری فرما کر مشکور و ممنون  
فرمائیں

عین نواریش ہوگا

العاظم

آپ کا خادم

سید بلال شاہ PST

جی پی ایس سنکراؤٹ پشاور

سوائس نمبر 0346-9078029

2153  
19-11-2022

27



**SUB DIVISION EDUCATION OFFICER (MALE) TOWN-III**  
**PESHAWAR**

NO: 1159

Dated: 29/11/2022

File No. Explanation 5-17 SDEO (M) T-III Peshawar

To,

Mr. Bilal Shah PST.

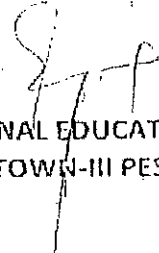
SUBJECT:

EXPLANATION:

Memo,

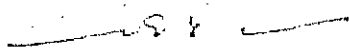
Reference to the subject cited above that you did not obey your transfer order which was issued by DEO (M) Peshawar vide Endst No.3962-661 dated: 12.11.2022.

Therefore you are directed to explain your position within One (01) day that why strict disciplinary action should not be taken against you under the E&SE Rules 2011.

  
SUB DIVISIONAL EDUCATION OFFICER  
(MALE) TOWN-III PESHAWAR

Copy to:-

1. District Education Officer (Male) Peshawar
2. Head Teacher Concerned
3. Master File

  
SUB DIVISIONAL EDUCATION OFFICER  
(MALE) TOWN-III PESHAWAR

To

The SDEO (Male),  
Town - III,  
Peshawar.

1530  
26-11-2022  
SDEO Office

28

Subject: Reply to Explanation Letter No. 1104  
Dated 24-11-2022.

Dear Sir,

I am writing in response to your explanation that why I did not take charge in GPS Bazid Khel No. 4 Peshawar. The reason behind this matter is that I have submitted appeals to DEO (Male) Peshawar and Director E&SE, Khyber Pakhtunkhwa in their respective offices. I am waiting for their responses they accept or reject my appeals. (copies attached)

Therefore, it is requested to kindly instruct the PSHT GPS Manakora to allow me for attendance register for my attendance till the reply of my appeals. I shall be grateful for this act of kindness.

Thanking You

  
25-11-2022

Copies forwarded to:  
⇒ Director E&SE KP  
⇒ DEO (Male) Peshawar.

1479  
02/12/2022

Syed Bilal Shah  
PST GPS Manakora Pesh  
0346-9078029

مجدد منت جناب ڈائریکٹر صاحب ایلیمنٹری اینڈ سیکنڈری ایجوکیشن ڈیپارٹمنٹ خیبر پختونخوا

توان: ایٹل، سردار منسوخی ٹرانسفر آرڈر نمبر 661-3962 اور نو 11-12-2022 سید باہل شاہ بی ایس ٹی، جاری کردہ ڈی این او تال پشاور

جناب عالی!

مذہب انتماس ہے کہ مسائل گورنمنٹ پرائمری سکول منگراؤ پشاور میں ڈی ای سرانجام دے رہا ہے۔ مسائل کے خلاف سکول نے ہیڈ ٹیچر نے ایک شکایت بھیج کر انہی تھی جس میں بے بنیاد اور سن گھڑت الزامات لگا کر اپنے جتنے اور پچھاڑا جھائی کے دستخط کروانے اور ساتھ ہی دو سرٹ کو تلوں کی جعلی دستخط خود کروائے (تو یہی بیان ایف ہے) تاکہ میرے خلاف کس مسئلہ ہو جائے اور افسران اس سے پہنچنے لیں کہ کیونہی بھی ایسی ٹیچر کے خلاف ہے۔ نیز انکو آئی منفقہ ہوئی اور بائس ٹان صاحب پر ٹیچر کی ایف ایس ویبہ بہادر انکو آئی آفیسر مقرر ہوئے، لیکن یہ قسمتی سے انکو آئی آفیسر نے نہ ہی درخواست کی حقیقی یا غیر حقیقی ہونے کی تصدیق کی اور نہ ہی درخواست گزاران کو طلب کر کے اتفاق مناووزہ ہی سکول کے سٹاف سے پوچھ گچھ کی، بس صرف مجھے اور ہیڈ ٹیچر صاحب کو طلب کر کے سوالنامے پر کروائے اور میرے خلاف کیلٹر نہ پورٹ مرتب کر کے جمع کروادی جس کے خلاف میں نے ڈی ای او صاحب کو دوبارہ انکو آئی کروانے کیلئے درخواست بھی دی تھی اور آپ صاحبان کو بھی اسکی ایک کاپی ارسال کی تھی (کاپی ایف ہے) لیکن ڈی ای او صاحب نے میرے درخواست کو نظر انداز کر کے میرے خلاف کیلٹر نہ کارروائی کرتے ہوئے میرا تبادلہ جی پی ایس بازیہ قبل نمبر 4 میں کر دیا جو کہ سراسر ناانسانی اور ظلم ہے (آرڈر کاپی ایف ہے)۔ لہذا آپ صاحبان سے انتہا ہے کہ مذکورہ ٹرانسفر آرڈر کی منسوخی کے احکامات صادر فرما کر منقولہ فرمائیں اور اگر ضرورت ہو تو آپ اپنے نمبر ڈائریکٹوریٹ سے دوبارہ انکو آئی کروا کر کیس کو پورا دیے۔ دیکھیں اور مجھ سمیت جو بھی ذمہ دار یا تصور دار نکلے اس کے خلاف سخت تادیبی کارروائی کروائیں۔

*[Handwritten signature]*

آپ کا نام

سید باہل شاہ  
پرائمری سکول ٹیچر  
جی پی ایس منگراؤ پشاور  
موبائل نمبر: 0346-9078029

1227/11  
28/11/22





30

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR

No. \_\_\_\_\_ / Absent Report T-III  
Date \_\_\_\_\_ / 2022

To,

Mr. Syed Bilal Shah, PST  
GPS Manakrao Peshawar.

Subject: **WARNING:**

Memo.

You are hereby warned to be careful in future and directed you to perform your duty at the station where you have transferred otherwise due to non-compliance, strict disciplinary action will be taken against you under the E&D Rules 2011.

—sd—

Dy: District Education Officer  
(Male) Peshawar

Endst No: 9083-90 / Absent Report T-III. Dated 9/12 / 2022.

Copy of the above is forwarded to the:-

1. SDEO (M) Town-III Peshawar w/r to his letter No.1103, dated 23/11/2022.
2. ASDEO (M) Circle Concerned.

Dy: District Education Officer  
(Male) Peshawar

OFFICE OF THE ASSISTANT SUB DIVISIONAL EDUCATION OFFICER (MALE) CIRCLE CANTT PESHAWAR

Endst No. 1143-1146 Dated 12/12/2022

Copy forwarded to the:

1. Head Teacher GPS Bazid Khel No.4 for strict compliance.
2. Mr. Syed Bilal Shah GPS Bazid Khel No.4 for strict compliance.
3. SDEO (M) Town -III, Peshawar
4. DEO (M) Peshawar with reference to his above mentioned letter Endst No and Date.

Asst: Sub Divisional Education Officer  
(Male) Circle Cantt, Peshawar

قیمت 50 روپے	55492	  
ایڈویکٹ: <u>ولید خان</u>	بار کونسل/ ایسوسی ایشن نمبر: <u>BL-09-1585</u>	
رابطہ نمبر: <u>0300-5980225</u>	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	

بعدالت جناب: سر ڈاکٹر عبدالرشید خان

	منجانب:
	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
تھانہ:	

**باعت تحریر آئکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام کیلئے ولید خان اور ولید خان کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی 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 بااختیارات حاصل ہوں گے اور اس کا سبب پر داخلہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر اچانہ 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 سندر ہے

عدالت منجانب سے تسلیم فرمایا گیا ہے  
 لکھتے ہیں ارباب سندھ بامیان میں

المقوم: ولید خان  
 PESHAWAR BAR ASSOCIATION  
 BER JAKHTOONKHWAA  
 15/12/2022  
 Accepted

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔