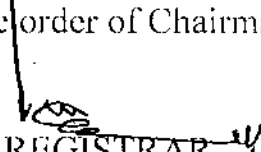


FORM OF ORDER SHEET

Court of _____

Case No.- 328/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/02/2023	<p>The appeal of Mr. Majced Ullah resubmitted today by Mr. Kabir Ullah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khe! Sub Division Wazir Bannu received today i.e. on 01.02.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexures-A, B, C & D of the appeal are illegible which may be replaced by legible/better one.


No. 575 /S.T,

DT 2/2 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kabir Ullah Khattak Adv.
High Court Peshawar.

Re submitted
objection has
been removed


17-2-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. 328 of 2023

Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khel Sub
Division Wazir District Bannu.

..... Appellant


VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
4. District Education Officer (Male) Bannu.

..... Respondents

INDEX

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal with verification		1 to 5
2.	Application for condonation of delay		6-7.
3.	Addresses of the parties		8
4.	Affidavit		9
5.	Copy appointment order	A	(10)
6.	Copy of attendant register	B	11 to 18
7.	Copy of letter dated 20/05/2022	C	(19)
8.	Copy of impugned order	D	(20)
9.	Copy of Departmental Appeal	E	(21)
10.	Copy of application	F	22
11.	Copy of application & letter	G&H	
12.	Wakalat Nama		

Appellant
Through 
Roeda Khan
Advocate, High Court,
Peshawar

①

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

Appeal No. 328 of 2023.

Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khel Sub
Division Wazir District Bannu.

..... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
4. District Education Officer (Male) Bannu.

..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK
SERVICE TRIBUNAL ACT, 1974, AGAINST
THE IMPUGNED ORDER DATED
20/05/2022 WHEREBY MAJOR PENALTY
OF REMOVAL FROM SERVICE WAS
IMPOSED TO THE APPELLANT AGAINST
WHICH THE APPELLANT FILED
DEPARTMENTAL APPEAL ON 15.06.2022
WHICH HAS NOT BEEN DECIDED
WITHIN THE STATUTORY PERIOD IN 90
DAYS.**

Prayer:

By acceptance of this appeal the impugned order dated 20.05.2022 may please be set aside and the appellant may kindly be reinstated on his service along with all back benefits.

(2)

Respectfully Sheweth:

FACTS

The appellant respectfully submits as under:

- 1) That the appellant has been appointed as Naib Qasid on 12/07/2018 with respondent Department. (Copy of appointment order is attached as Annexure-A).
- 2) That after appointment the appellant performed his duty regularly with full devotion and hard work and no complaint whatsoever has been made against the appellant. (Copy Attendance Register is annexed as B).
- 3) That on 19/05/2022 a surprise visit was conducted by respondent No. 03 at GHS Baka Khel, at about 12:15 AM during Matric Board Examination.
- 4) That after conducting of the said meeting the respondent No. 3 sent a letter to respondent No. 1 on 20.05.2022. Copy of letter 20/05/2022 is attached as Annexure-C).
- 5) That the appellant has been removed from service on 20/05/2022 by the respondent Department. (Copy of impugned order is attached as Annexure-D).
- 6) That the appellant submitted a Departmental Appeal on 15/06/2022 against the impugned order

dated 20/05/2022. (Copy of Departmental Appeal is attached as Annexure-E).

- 7) That the appellant submitted an application to the respondent Department for the response of Departmental Appeal dated 15/06/2022 on 30/12/2022 but no response has been given by the respondent Department. (Copy of application is attached as Annexure-F).
- 8) That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

GROUND

- A). That the impugned order dated 20/05/2022 comes under the definition of void order because it has been passed without fulfilling the codal formalities.
- B) That no charge sheet, no statement of allegation and show cause notice has been issued/served to the appellant by the respondent Department.
- C). That no publication has been made in two leading newspapers against the appellant and no regular and Departmental inquiry has been conducted against the appellant.
- D). That no statement of witness has been recorded and no opportunity of cross

examination has been provided to the appellant.

- E) That the order has been passed by incompetent authority against which no limitation has been counted according to the Judgment of Supreme Court.
- F) That there is no absentia on part of the appellant which has also been clarified from the application submitted by the principal GHS Baka khel Bannu to respondent No. 4. (Copy of application and office letter dated 05/11/2022 are attached as Annexure G & H).
- G) That the penalty has come under the definition of harsh one.
- H) That the appellant has a poor person and the only earning hand of the family there for he also entitled to reinstatement.
- I) That no opportunity of personal hearing and defense has been provided to the appellant.
- J). Any other grounds will be raised at the time of arguments with prior permission of this Hon' able Tribunal.

It is therefore most humbly prayed that on acceptance of this appeal the impugned order

dated 20.05.2022 may please be set aside and the
appellant may kindly be reinstated on his service
with all back benefits.

Any other remedy which this august tribunal
deems fit that may also onward granted in favor
of appellant.

Appellant

Through


Kabir Ullah Khattak

&

Roeeda Khan

Advocates, High Court,
Peshawar.

6

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

Appeal No. _____ of 2023

Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khel Sub
Division Wazir District Bannu.

..... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
4. District Education Officer (Male) Bannu.

..... Respondents

**APPLICATION FOR CONDONATION
OF DELAY (IF ANY).**

Respectfully Sheweth:

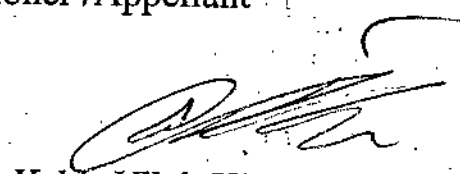
- 1) That the petitioner/appellant has filed the accompanied appeal today in which no date has yet been fixed.
- 2) That petitioner/appellant has a good prima facie case and is hopeful for its success and the grounds mentioned in appeal may be treated as integral part of this application.
- 3) That the appellant submitted a Departmental Appeal on 15/06/2022 against the impugned order dated 20/05/2022.

- 4) That the appellant submitted an application to the respondent Department for the response of Departmental Appeal dated 15/06/2022 on 30/12/2022 but no response has been given by the respondent Department.
- 5) That the impugned order has been passed by incompetent authority as well as passed without fulfilling the codal formalities which comes under the definition of void order against which no limitation has been counted according to the Judgment passed by the Supreme Court.
- 6) That the order has been passed by incompetent authority against which no limitation has been counted according to the Judgment of Supreme Court.
- 7) That there are many Judgment of the superior court that cases should be decided on merit rather than on technicality and there are also so many Judgments of the Supreme Court that if the respondents have no case on merit limitation has not becomes a hurdle in way of justice.

It is, therefore, most humbly prayed that on acceptance of this application the delay if any may be condoned in the interest of justice.

Petitioner /Appellant

Through



Kabir Ullah Khattak

&



Rameed Khan

8

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

Appeal No. _____ of 2023

Mr. Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khel
Sub Division Wazir District Bannu.

..... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
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4. District Education Officer (Male) Bannu.

..... Respondents

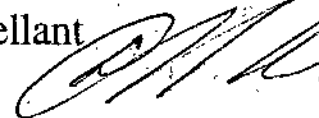
ADDRESSES OF THE PARTIES

Appellant

Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khel Sub
Division Wazir District Bannu.

Respondents

- 1) Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
- 2) Director Elementary and Secondary Education Peshawar.
- 3) Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
- 4) District Education Officer (Male) Bannu.

Appellant
Through 
Kabir Ullah Khattak

 &
Rooeda Khan

Advocates, High Court, Peshawar

9

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

Appeal No. _____ of 2023

Mr. Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khel
Sub Division Wazir District Bannu.

..... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
4. District Education Officer (Male) Bannu.

..... Respondents

AFFIDAVIT

I, Mr. Mr. Majeed Ullah Ex- Naib Qasid GHS Baka Khel Sub Division Wazir District Bannu do hereby solemnly affirm and declare on oath that the content of the above application are true and correct to the best of my knowledge and belief and nothing has been kept secret and concealed from this Hon'ble Tribunal.


DEPONENT

Better Copy

**OFFICE OF THE
AGENCY EDUCATION OFFICER FR BANNU**

Near bannu Township Bezan Khel Road Bannu
Phone No 0928-633255 Fax No. 0928-633255

APPOINTMENT ORDER

Consequent upon the selection by Departmental selection committee, the following candidate of Bannu is hereby appointed against vacant post Class-IV (N)/Qasid post in the school noted against his name in BPS-3@Rs. 9610-390-21310 PM +usual allowances with effect from the date of taking over charge in the concerned school in the interest of public service.

Note:

Decide other terms and conduction given appointment order, this appointment is made on the merit basis as per selection by the DSC on need basis according to the service of education institution it found substandard by any authorize committee, court of authority. The appointment will face cancelation of his/her/their appointment happily and will deposit what has received a salary and Government treasury.

S#	Name of candidate with father's Name	Place of posting	Remarks
1.	Mr. majeed Ullah WS/o Radat Khan R/o Baka Khel P.O Baka Khel	GHS Baka Khel	Against vacant N/Qasid post

Terms and conditions:-

8. This appointment has been made purely and temporary basis and is subject to the terms and conditions framed by the Government time to time, moreover this appointment came be withdrawn and is liable to termination without any notice, if any legal, clerical or other kind of mistake arises therein. If he wishes to resign his service he will give one months prior notice or one month full pay will be forfeited in lieu thereof.
9. he will produced his health and Age certificate from medical superintendent the Khalifa Gul Nawaz Hospital Bannu, District Headquarter Hospital Bannu/Agency Surgeon FR Bannu.
10. he will be not handed over charge if he is below or above within the current age limit frame by the Government if he fails to resume the charge within fifteen days after issuing date of his order his appointment order will be considered as canceled.
11. his appointment is subject to the selection by Departmental Selection Committee;
12. The appointee will submit in affidavit to the effect that he do not possess any kind of service in any Government/Semi Government or any other Department OR does not work is Nazim, Naib Nazi and Consoler in Town, Tehsil OR Union Counsel OR student of any education institution.
13. any person who conceals OR submit wrong information's disciplinary action will be taken against him as per rules.
14. Charge report should be submitted and duplicate to all concerned.

MUHAMMAD YASIN AFRIDI
Agency Education Officer
FR Bannu at Bannu

Endst No. 1715-20

Dated 12/07/2018

8. Director Education (FATA) KPK Peshawar.
9. Deputy Commissioner/Political Agent FR Bannu.
10. District Account Officer Bannu.
11. AAEO area concerned.
12. Head of Institution concerned.
13. Accountant Local Office.
14. Candidate concerned.

AGENCY EDUCATION OFFICER
FR Bannu at Bannu



Office of the

AGENCY EDUCATION OFFICER, FR BANNU

How to reach Township Office: FR Bannu, District Bannu
Ph: 092-433255, Fax: 092-433256

APPOINTMENT ORDER:

Consequent upon the Selection by Departmental Selection Committee of the following candidate of FR Bannu, is hereby appointed against vacant post of P/O Bakka Khet noted against his name in BPS-03-G Rs. 9610-390-21310 PIA plus usual allowances with effect from the date of taking over charge in the concerned school in the interest of public service.

Note: Beside other terms and conditions given in this appointment order, the appointee shall be governed by the merit basis per selection by the concerned authority. The appointee shall be liable to termination without any notice, if any legal, clerical or other kind of mistake arises therein. If he wishes to resign from service, he will give one month's prior notice OR one month's full pay will be forfeited in lieu thereof. He will produce his Health and Age certificate from Medical Superintendent (MCHS) Gul Nawaz Hospital Bannu/District Headquarter Hospital Bannu/Agency Surgeon FR Bannu. He will not be handed over charge if he is below OR above within the current age limits framed by the Govt. If he fails to resume the charge within 15 (fifteen) days after issuing date of his order, his appointment shall be considered as cancelled. His Appointment is subject to the Selection by Departmental Selection Committee. The appointee will submit an affidavit to the effect that he doesn't possess any kind of service in any Govt/PS or Govt OR any other Department OR does not work as Nazim, Naib Nazim, and Councilor in any, but in any District Council OR student of any Education Institution. Any persons who conceals or submit wrong informations disciplinary action will be taken against them as per rules. Charge reports should be submitted in duplicate to all concerned.

S#	Name of candidate with Father's Name	Place of posting.	Remarks
1	Mr. Majeed Ullah S/O Radat Khan P/O Village Bakka Khet P/O Bakka Khet	GHS Bakka Khet	Against vacant P/O Bakka Khet Post

TERMS AND CONDITIONS:

- This appointment has been made purely on temporary basis and is subject to the terms and conditions framed by the Government time to time. Moreover this appointment can be withdrawn and is liable to termination without any notice, if any legal, clerical or other kind of mistake arises therein. If he wishes to resign from service, he will give one month's prior notice OR one month's full pay will be forfeited in lieu thereof.
- He will produce his Health and Age certificate from Medical Superintendent (MCHS) Gul Nawaz Hospital Bannu/District Headquarter Hospital Bannu/Agency Surgeon FR Bannu.
- He will not be handed over charge if he is below OR above within the current age limits framed by the Govt. If he fails to resume the charge within 15 (fifteen) days after issuing date of his order, his appointment shall be considered as cancelled.
- His Appointment is subject to the Selection by Departmental Selection Committee.
- The appointee will submit an affidavit to the effect that he doesn't possess any kind of service in any Govt/PS or Govt OR any other Department OR does not work as Nazim, Naib Nazim, and Councilor in any, but in any District Council OR student of any Education Institution.
- Any persons who conceals or submit wrong informations disciplinary action will be taken against them as per rules.
- Charge reports should be submitted in duplicate to all concerned.

MUHAMMAD YASIN AHMED
Agency Education Officer
FR Bannu - Bannu

Order No. 1715-20 / Dated: 12/07/2016

Copies forwarded for information to the:

- Director Education (FATA) KPK, Peshawar.
- Deputy Commissioner/Political Agent FR Bannu.
- District Account Officer Bannu.
- AAEO area concerned.
- Head of Institution concerned.
- Accountant local office.
- Candidate concerned.

M. Y. Ahmed
Agency Education Officer
FR Bannu - Bannu

جستار حاضرى ۲۰۲۰

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ردیف	نام خانوادگی	تاریخ تولد	محل تولد	وضعیت	تاریخ ازدواج	محل ازدواج	تاریخ خدمت	محل خدمت	تاریخ بازنشستگی	محل بازنشستگی
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جستار حاضرى ۲۰۲۰

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ردیف	نام خانوادگی	تاریخ تولد	محل تولد	وضعیت	تاریخ ازدواج	محل ازدواج	تاریخ خدمت	محل خدمت	تاریخ بازنشستگی	محل بازنشستگی
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PRINCIPAL
G.H.S Bakka
SDW Bannur

جسٹری حاضری
2021
مستعملین

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Principal
G.H.S Bahawalpur

جسٹری حاضری
2021
مستعملین

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Principal
G.H.S Bahawalpur

Sl. No.	Roll No.	Class	Section	Subject	Teacher	Date	Time	Present	Absent	Remarks
1	1	P	2:00	P	7:45	P	2:30	P	8:15	
2	2	L	2:00	P	7:45	P	2:30	P	8:15	
3	3	P	2:00	P	7:45	P	2:30	P	8:15	
4	4	L	2:00	P	7:45	P	2:30	P	8:15	
5	5	P	2:00	P	7:45	P	2:30	P	8:15	
6	6	L	2:00	P	7:45	P	2:30	P	8:15	
7	7	P	2:00	P	7:45	P	2:30	P	8:15	
8	8	L	2:00	P	7:45	P	2:30	P	8:15	
9	9	P	2:00	P	7:45	P	2:30	P	8:15	
10	10	L	2:00	P	7:45	P	2:30	P	8:15	
11	11	P	2:00	P	7:45	P	2:30	P	8:15	
12	12	L	2:00	P	7:45	P	2:30	P	8:15	
13	13	P	2:00	P	7:45	P	2:30	P	8:15	
14	14	L	2:00	P	7:45	P	2:30	P	8:15	
15	15	P	2:00	P	7:45	P	2:30	P	8:15	
16	16	L	2:00	P	7:45	P	2:30	P	8:15	
17	17	P	2:00	P	7:45	P	2:30	P	8:15	
18	18	L	2:00	P	7:45	P	2:30	P	8:15	
19	19	P	2:00	P	7:45	P	2:30	P	8:15	
20	20	L	2:00	P	7:45	P	2:30	P	8:15	
21	21	P	2:00	P	7:45	P	2:30	P	8:15	
22	22	L	2:00	P	7:45	P	2:30	P	8:15	
23	23	P	2:00	P	7:45	P	2:30	P	8:15	
24	24	L	2:00	P	7:45	P	2:30	P	8:15	
25	25	P	2:00	P	7:45	P	2:30	P	8:15	
26	26	L	2:00	P	7:45	P	2:30	P	8:15	
27	27	P	2:00	P	7:45	P	2:30	P	8:15	
28	28	L	2:00	P	7:45	P	2:30	P	8:15	
29	29	P	2:00	P	7:45	P	2:30	P	8:15	
30	30	L	2:00	P	7:45	P	2:30	P	8:15	
31	31	P	2:00	P	7:45	P	2:30	P	8:15	

Sl. No.	Roll No.	Class	Section	Subject	Teacher	Date	Time	Present	Absent	Remarks
1	1	P	7:30	P	2:00	P	8:15	P	9:00	
2	2	L	7:30	P	2:00	P	8:15	P	9:00	
3	3	P	7:30	P	2:00	P	8:15	P	9:00	
4	4	L	7:30	P	2:00	P	8:15	P	9:00	
5	5	P	7:30	P	2:00	P	8:15	P	9:00	
6	6	L	7:30	P	2:00	P	8:15	P	9:00	
7	7	P	7:30	P	2:00	P	8:15	P	9:00	
8	8	L	7:30	P	2:00	P	8:15	P	9:00	
9	9	P	7:30	P	2:00	P	8:15	P	9:00	
10	10	L	7:30	P	2:00	P	8:15	P	9:00	
11	11	P	7:30	P	2:00	P	8:15	P	9:00	
12	12	L	7:30	P	2:00	P	8:15	P	9:00	
13	13	P	7:30	P	2:00	P	8:15	P	9:00	
14	14	L	7:30	P	2:00	P	8:15	P	9:00	
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16	16	L	7:30	P	2:00	P	8:15	P	9:00	
17	17	P	7:30	P	2:00	P	8:15	P	9:00	
18	18	L	7:30	P	2:00	P	8:15	P	9:00	
19	19	P	7:30	P	2:00	P	8:15	P	9:00	
20	20	L	7:30	P	2:00	P	8:15	P	9:00	
21	21	P	7:30	P	2:00	P	8:15	P	9:00	
22	22	L	7:30	P	2:00	P	8:15	P	9:00	
23	23	P	7:30	P	2:00	P	8:15	P	9:00	
24	24	L	7:30	P	2:00	P	8:15	P	9:00	
25	25	P	7:30	P	2:00	P	8:15	P	9:00	
26	26	L	7:30	P	2:00	P	8:15	P	9:00	
27	27	P	7:30	P	2:00	P	8:15	P	9:00	
28	28	L	7:30	P	2:00	P	8:15	P	9:00	
29	29	P	7:30	P	2:00	P	8:15	P	9:00	
30	30	L	7:30	P	2:00	P	8:15	P	9:00	
31	31	P	7:30	P	2:00	P	8:15	P	9:00	

رجسٹر حاضری مندرجہ ذیل کے لئے
صفحہ نمبر 203

Sl. No.	Student Name	Roll No.	Present	Absent	Remarks
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
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47			
48			
49			
50			

Present	
Absent	
Remarks	
Total	

رجسٹر حاضری مندرجہ ذیل کے لئے
صفحہ نمبر 203

Sl. No.	Student Name	Roll No.	Present	Absent	Remarks
1			
2			
3			
4			
5			
6			
7			
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37			
38			
39			
40			
41			
42			
43			
44			
45			
46			
47			
48			
49			
50			

Present	
Absent	
Remarks	
Total	

12

The image shows a large, dense grid of handwritten text, likely a ledger or account book. The grid is divided into several sections by thicker lines. The text is extremely small and difficult to read, but it appears to be organized into columns and rows. There are some larger, more legible characters or symbols interspersed within the grid, possibly representing numbers or specific entries. The overall appearance is that of a highly detailed and organized record-keeping system.

101

Scanned with CamScanner

Scanned with CamScanner

13.

The image shows a highly detailed and dense grid of handwritten text, likely a ledger or account book. The grid is composed of many small, rectangular cells, each containing a few characters or numbers. The text is written in a cursive or semi-cursive hand, and the overall appearance is that of a very busy and organized record-keeping system. The grid is divided into several sections by thicker lines, suggesting different categories or periods of time. The handwriting is small and tightly packed, making it difficult to read individual entries. The overall layout is vertical, with the text filling most of the page area.

14

121

The image displays a large, dense grid of small, illegible characters or symbols, possibly a code or cipher, covering most of the page. The grid is organized into several vertical columns and horizontal rows, with some larger, more distinct symbols interspersed. The overall appearance is that of a highly structured and complex data set or a cryptographic message.

Date		Description		Particulars		Amount		Balance	
1911	Jan 1	To Balance							
1911	Jan 15	By Cash							
1911	Feb 1	To Cash							
1911	Mar 1	To Cash							
1911	Apr 1	To Cash							
1911	May 1	To Cash							
1911	Jun 1	To Cash							
1911	Jul 1	To Cash							
1911	Aug 1	To Cash							
1911	Sep 1	To Cash							
1911	Oct 1	To Cash							
1911	Nov 1	To Cash							
1911	Dec 1	To Cash							
1911	Total								

Total
 1911

Date		Description		Particulars		Amount		Balance	
1911	Jan 1	To Cash							
1911	Jan 15	To Cash							
1911	Feb 1	To Cash							
1911	Mar 1	To Cash							
1911	Apr 1	To Cash							
1911	May 1	To Cash							
1911	Jun 1	To Cash							
1911	Jul 1	To Cash							
1911	Aug 1	To Cash							
1911	Sep 1	To Cash							
1911	Oct 1	To Cash							
1911	Nov 1	To Cash							
1911	Dec 1	To Cash							
1911	Total								

Scanned with CamScanner

Scanned with



Date		Description		Amount		Balance	
Day	Month	Particulars	To	By	Rs.	P.	Rs.
1	1						
2	1						
3	1						
4	1						
5	1						
6	1						
7	1						
8	1						
9	1						
10	1						
11	1						
12	1						
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31	1						
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28	3						
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30	3						
31	3						

Better Copy

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

No. 5043

Dated 20/05/2022

To

The Secretary,
Elementary and Secondary Education Department
Khyber Pakhtunkhwa Peshawar

Subject **SURPRISE VISIT/DISCIPLINARY ACTION**

Memo

I am directed to refer to the subject cited above and to state that, during the course of a surprise visit to GHS, Baka Khel, Sub-Division Wazir Bannu, by the Worthy Director E&SE Khyber Pakhtunkhwa Peshawar, it was noted that the principal was not present at the school, due to his engagement in inspection of SSC Examination Halls with school presenting a deserted look on following grounds.

- I. Loose Administration and Poor Academic Performance.
- II. Teachers Absenteeism.
- III. Absence of Class-IV
- IV. No students were found in school at 12:10 am through the closing time was 12:30 PM.
- V. Two Class Rooms were found filled with old furniture which were supposed to be auctioned.
- VI. Principal was presenting poor look due to garbage and.
- VII. Principal Office was looking like a horse-stable.
- VIII. SCT was working as incharge despite the availability SST.
- IX. Non-availability of Class-IV Attendance Register.

I am further directed to request your good self in kindly conduct no inquiry the above mentioned points for necessary action Please.

ASSISTANT DIRECTOR (ESTAB)
DIRECTORATE OF E&SE KP PESHAWAR

Endst No. _____/Dated: _____

Copy forwarded for information.

1. Deputy Commissioner, Bannu.
2. District Education Officer.
3. PA to Director E&SE KP Peshawar.
4. PA to Addl: Director E&SE KP Peshawar.
5. Office record.

ASSISTANT DIRECTOR (ESTAB)
DIRECTORATE OF E&SE KP PESHAWAR



Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

No: 5049

Dated: 20/5/2022



The Secretary,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: SURPRISE VISIT / DISCIPLINARY ACTION
Memo:

I am directed to refer to the subject cited above and to state that, during the course of a surprise visit to GHS, Haka Khel, Sub-Division Wazir Bannu, by the Worthy Director E&SE Khyber Pakhtunkhwa Peshawar, it was noted that the Principal was not present at the school, due to his engagement in inspection of SSC-Examination Halls, with school presenting a deserted look on following grounds:

- i. Loose Administration and Poor Academic Performance.
- ii. Teachers Absenteeism.
- iii. Absence of Class-IV's.
- iv. No students were found in school at 12.10 AM although the closing time was 12.30 PM.
- v. Two Class Rooms were found filled with old furniture, which were supposed to be auctioned.
- vi. School was presenting poor look due to garbage and dirt.
- vii. Principal Office was looking like a horse-stable.
- viii. SGT was working as incharge despite the availability of SSTs.
- ix. Non-availability of Class-IV's Attendance Register.

I am further directed to request your good self kindly conduct an inquiry into the above mentioned points for further necessary action, please.

[Signature]
20/5/2022
ASSISTANT DIRECTOR (ESTAB.)
DIRECTORATE OF E&SE KP PESHAWAR

- Encl. No: _____
Copy forwarded for information:
1. Deputy Commissioner, Bannu.
 2. District Education Officer, Bannu.
 3. PA to Director E&SE KP Peshawar.
 4. PA to Addl. Director E&SE KP Peshawar.
 5. Office record.

[Signature]
ASSISTANT DIRECTOR (ESTAB.)
DIRECTORATE OF E&SE KP PESHAWAR

Better Copy

20

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

No. _____

Dated _____

NOTIFICATION

Consequent upon the surprise visit by the Competent Authority and finding therein, Mr. Majeed Ullah, Naib Qasid, absent at the school, GHS Baka Khel Sub-Davison Wazir Bannu, on 19/05/2022, and confirmed as permanent absent from his duty since his appointment by the In-Charge of the school alongwith all staff members, without any sanction of leave, is hereby removed from service with immediate effect.

**ASSISTANT DIRECTOR (ESTAB)
DIRECTORATE ORF E&SE KP PESHAWAR**

Endst No. _____ /Dated 20/05/2022

Copy forwarded for information.

1. Deputy Commissioner, Bannu.
2. District Education, Bannu.
3. District Account, Officer Bannu.
4. PA to director E&SE Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: Director E&SE KP Peshawar.
6. Office concerned.

**ASSISTANT DIRECTOR (ESTAB)
DIRECTORATE ORF E&SE KP PESHAWAR**

Amare (D) (20)

Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar



No: _____

Dated: _____

NOTIFICATION

Consequent upon the surprise visit by the Competent authority and finding therein, Mr. Majeedi Ullah, Naib Qasid, absent at the school, Baka Khel Sub-Division Wazir Bannu, on 19-05-2022, and confirmed as permanent absent from his duty since his appointment by the In-charge of the school along with all staff members, without any sanction of leave, is hereby removed from service with immediate effect.

W/2022/206
ASSISTANT DIRECTOR (ESTAB:)
DIRECTORATE OF E&SE KP PESHAWAR

Handst No: _____

/Dated: 20/5/22

Copy forwarded for information:

1. Deputy Commissioner, Bannu.
2. District Education Officer, Bannu
3. District Account Officer, Bannu.
4. PA to Director E&SE KP Peshawar
5. PA to Adlt. Director E&SE KP Peshawra.
6. Office record.

ASSISTANT DIRECTOR (ESTAB:)
DIRECTORATE OF E&SE KP PESHAWAR

خدمت عالی - سیکرٹری انچارج ضلع مظفر آباد

مظفر آباد - درخشاں پورہ کے لوگوں کی

خدمت عالی

گزارش ہے کہ سائل کو اپنے مکان پر قبضہ کرنے اور اس میں

بکریاں رکھنے سے روکنا اور اس کے خلاف کارروائی کرنا

کے بارے میں درخواست ہے۔

ڈسٹرکٹ انچارج، مظفر آباد کے پاس لکھی گئی ہے۔

مظفر آباد میں درختوں کے پھل کھانے سے روکنا اور اس کے

خلاف کارروائی کرنا۔

اس کے بارے میں درخواست ہے کہ سائل کو نوٹس دیا جائے

تاکہ وہ اس کے خلاف کارروائی کرے۔

مظفر آباد

15-6-2024

ایچ ایم

محمد الہ آبادی، مظفر آباد کے لوگوں کی

بخدمت جناب سیکرٹری ایجوکیشن خیبر پختونخوا پشاور

درخواست برآمد معلومات فراہم کرنے برائے ڈیپارٹمنٹل اپیل مورخہ 15/06/2022

جناب عالی: سائل حسب ذیل عرض رسان ہے۔

1. یہ کہ سائل کو محکمہ ایجوکیشن نے مورخہ 20/05/2022 کو نوکری سے برخاست کیا تھا۔

2. یہ کہ سائل نے نوکری بحالی کے لیے ڈیپارٹمنٹل اپیل مورخہ 15/06/2022 کو دائر کیا تھا جسکی معلومات مہیا کرنے کے لیے سائل نے اس سے پہلے بھی دو درخواستیں دی تھی لیکن تا حال اس درخواست پر کوئی عمل درآمد نہ ہوا۔

لہذا استدعا کی جاتی ہے کہ بمنظوری درخواست ہذا سائل کو ڈیپارٹمنٹل اپیل کی معلومات فراہم کرنے کا حکم صادر فرمائی جائے۔

مورخہ 30/12/2022

سائل: مجید اللہ

Avenue (4) (23)

آفس آف دی پریسیل صاحب گورنمنٹ ہائی سکول سب ڈویژن وزیر ہون

Endst No 494

dated 05/11/2022

درخواست برائے بحال سرویز آف کلاس فور ملازمین

موضوع

بخدمت جناب D.E.O صاحب ضلع بنوں S.D.W بنوں

جناب عالی!

2799
07-11-22

Handwritten signature and notes in the top right corner.

گزارش جھکوز اور ہے کہ ڈائریکٹر صاحب آف ایجوکیشن K.P.K چٹاورد نے مورخہ 19/05/2022 گورنمنٹ ہائی سکول بکاٹیل ایس ڈی ڈیو کا وقت 12:10 pm اپنا تک ویزٹ کیا اس دوران سکول حد اس میں ٹرک کا بگڑا ایگرام بھی شروع تھا ای دن پرچہ 11:30 بجے ختم ہوا تھا ای سکول کے کلاس فور ملازمین چند ایک کے سوا تمام سکول میں حاضر تھے وہ اس دوران انچارج کی اجازت سے روٹی کھانے کیلئے باہر گئے ہوئے تھے اور 1:30 بجے دوبارہ حاضر ہوئے۔ جناب والا میں بذات خود میٹرک ایگرام میں N.W.T.D چیز میں کی رڈ پر ہالوں کا معائنہ کرنے گیا ہوا تھا۔ میں نے سکول میں موجود س.C.T شیر ملا خان کو انچارج بنایا تھا اور اس وقت کوئی بھی S.S.T سکول نہیں پہنچا تھا یہ اسلئے کہ سکول شروع ہونے میں 30 منٹ ہاتی تھے۔ جناب والا میں اسی سکول کو مورخہ 1/01/2017 ٹرانسفر ہو کر چارج سنبھال لیا ہے اس وقت سے لے کر اب تک سکول کے کلاس فور ملازمین سکول میں اپنی ڈیوٹیاں احسن طریقے سے انجام دے رہے ہیں ابھی تک میں نے ان سے شکایت کے الفاظ نہیں سنے ہے اور نہ مجھے شکایت کا موقع دیا ہے یہ اسلئے کہ وہ اپنی ڈیوٹیاں دے رہے ہیں۔

جناب والا جس وقت سے سکول میں ہائیریک نظام شروع ہے ہر مہینے ہائیریک والے کلاس فور ملازمین کی حاضری رجسٹر چیک کرتے ہیں یہ رجسٹر سکول میں لکر کے پاس ہوتی ہے ویزٹ کے دوران لکر چھٹی پر تھے اور رجسٹر الماری میں بند پڑا تھا ای لئے صاحب اعلیٰ کو رجسٹر میرٹہ ہول میں حضرت چاہتا ہوں۔ جناب والا ڈائریکٹر سے مورخہ 20/05/2022 کو ہمارے سکول کے کلاس فور ملازمین کی (Removal Order) آرڈر ہڈر یہ D.E.O آفس سے وصول نے اس کے بعد ڈائریکٹر صاحب نے ہمارے لئے انکو آری مقرر کی انکو آری والے مورخہ 20/06/2022 کو سکول آکر انکو آری مکمل کر لی انکو آری والوں کے سامنے تمام کلاس فور ملازمین جمع نشانی کارڈ چیک کے انکو آری والوں نے ابھی تک کوئی رپورٹ نہیں دی۔ Removal Order کے باوجود بھی کلاس فور ملازمین اپنی اپنی ڈیوٹیاں دے رہے ہیں۔

جناب والا انکو آری اور رپورٹ نہ ملنے کے بعد میں نے بواسطت D.E.O صاحب سروں ایچل حکام بالا کو بھیج دی اس کی بھی کوئی رپورٹ نہ ملی اس کے بعد ہم نے لارڈ آف ایجوکیشن K.P.K کو سب تمام دستاویزات درخواست بھیج دی ان سے بھی کوئی جواب نہیں ملا ہے اب میں بواسطت آپ صاحبان دوبارہ حکام بالا کو کلاس فور ملازمین سروں بحالی کی ایچل کرتے ہیں۔ تاکہ یہ غریب کلاس فور تاقیامت دعاء گو رہے۔

End No 494 date 5/11/2022

Forwards to Honorable Director of Education
for kind consideration

پریسل
سب ڈویژن وزیر ہون
5/11/2022 مورخہ
S.D.W. Benue

Mamir 9

ATTESTED

Annex (9) 23

آفس آف دی پرنسپل صاحب گورنمنٹ ہائی سکول سب ڈویژن وزیر ہون

Endst No 499 dated 5/11/2022

درخواست برائے بحالی سرورسز آف کلاس فور ملازمین

عنوان:

بخدمت جناب D.E.O صاحب ضلع ہون / S.D.W ہون

جناب عالی!

2799
5/11/2022

Handwritten signature and notes in the top right corner.

گزارش بھگور انور ہے کہ ڈائریکٹر صاحب آف ایجوکیشن K.P.K پشاور نے مورخہ 19/05/2022 گورنمنٹ ہائی سکول کاخیل ایس ڈی ڈیو کا پورٹا 12:10 pm اچانک ویزٹ کیا اس دوران سکول عہد میں میٹرک کا بورڈ ایگزیم بھی شروع تھا اسی دن پرچہ 11:30 بجے ختم ہوا تھا اسی سکول کے کلاس فور ملازمین چند ایک کے سوا تمام سکول میں حاضر تھے وہ اس دوران انچارج کی اجازت سے روٹی کھانے کیلئے باہر گئے ہوئے تھے اور 1:50 بجے دوبارہ حاضر ہوئے۔

جناب والا میں بذات خود میٹرک ایگزیم میں N.W.T.D چیز میں کی آرڈر پر ہالوں کا معائنہ کرنے گیا ہوا تھا۔ میں نے سکول میں موجود کل S.C.T شیر ملاخان کو انچارج بنایا تھا اور اس وقت کوئی بھی S.S.T سکول نہیں پہنچا تھا یہ اسلئے کہ سکول شروع ہونے میں 30 منٹ باقی تھے۔

جناب والا میں اسی سکول کو مورخہ 1/01/2017 ٹرانسفر ہو کر چارج سنبھال لیا ہے اس وقت سے لے کر اب تک سکول کے کلاس فور ملازمین سکول میں اپنی ایوٹیاں احسن طریقے سے انجام دے رہے ہیں۔ ابھی تک میں نے ان سے شکایت کے الفاظ نہیں سنے ہیں اور نہ مجھے شکایت کا موقع دیا ہے یہ اسلئے کہ وہ اپنی ڈیوٹیاں دے رہے ہیں۔

جناب والا جس وقت سے سکول میں مانیٹرنگ نظام شروع ہے ہر صبح مانیٹرنگ والے کلاس فور ملازمین کی حاضری رجسٹر چیک کرتے ہیں یہ رجسٹر سکول میں کلرک کے پاس ہوتی ہے ویزٹ کے دوران کلرک چھٹی پر تھے اور رجسٹر الماری میں بند پڑا تھا اسی لئے صاحب اعلیٰ کو رجسٹر میں نہ ہونے میں معذرت چاہتا ہوں۔

جناب والا ڈائریکٹر سے مورخہ 20/05/2022 کو ہمارے سکول کے کلاس فور ملازمین کی (Removal Order) آرڈر بذریعہ D.E.O آفس سے وصول نے اس کے بعد ڈائریکٹر صاحب نے ہمارے لئے انکوائری مقرر کی انکوائری والے مورخہ 20/06/2022 کو سکول آکر انکوائری مکمل کر لی انکوائری والوں کے سامنے تمام کلاس فور ملازمین صحیح شناختی کارڈ چیک کئے انکوائری والوں نے ابھی تک کوئی رپورٹ نہیں دی۔ Removal Order کے باوجود بھی کلاس فور ملازمین اپنی اپنی ڈیوٹیاں دے رہے ہیں۔

جناب والا انکوائری اور رپورٹ نہ ملنے کے بعد میں نے بواسطت D.E.O صاحب سرورسز ایبل حکام بالا کو بھیجی اس کی بھی کوئی رپورٹ نہ ملی اس کے بعد ہم نے برٹری آف ایجوکیشن K.P.K کو صحیح تمام دستاویزات درخواست بھیجی ان سے بھی کوئی جواب نہیں ملا ہے اب میں بواسطت آپ صاحبان دوبارہ حکام بالا کو کلاس فور ملازمین سرورسز بحالی کی اپیل کرتے ہیں تاکہ یہ غریب کلاس فور تاقیامت دعاء کرے۔

End No 499 date 5/11/2022

Forwards to Honorable Director of Education
for kind consideration

Handwritten signature and stamp of the Principal, dated 5/11/2022.

Handwritten signature.

1/11/2022

Answer (A) (2A)

Office of the Principal GHS Baka Khel SDW Bannu DDO Code 6541 EMIS Code 63363

S.No	Name	F/Name	Design	BPS	DOB	Domicile	Personal No	CNIC	Contact No
1	Muhammad Saeed	Amir Qabool Khan	Chowkdar	03	1/01/1984	SDW Bannu	175592	22201-1158790-9	0332-7909156
2	Aslam Nawaz	Mir Alam Khan	W/C	03	1/01/1987	SDW Bannu	285816	22201-6509037-9	0335-8363427
3	Habib Rahman	Akbar Zaman	W/C	03	1/01/1965	SDW Bannu	182009	222011-3989546-	0333-9732404
4	Abdus Samad	Taradad Khan	Sweeper	03	1/01/1979	SDW Bannu	50379176	11101-6860762-7	0333-9743286
5	Qamar Ali Khan	Shah Wali Kha	Mall	03	1/01/1976	SDW Bannu	50411683	22201-6389614-9	0333-9765265
6	Sher Khan	Ardali Khan	Chowkdar	03	2.2.2001	SDW Bannu		11101-0808514-4	
7	Majeed Ullah	Raddad Khan	N/Qaid	03 SSC	28/02/1998	SDW Bannu	50411646	11101-3385665-9	0332-7884187

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Date: 5/11/2022

Office of the Principal GHS Baka Khel SDW Bannu DDO Code 6541 EMIS Code 63363

Ameer (H) (24)

S.No	Name	F/Name	Design	BPS	DOB	Domicile	Personal No	CNIC	Contact No
1	Muhammad Saeed	Amir Qabool Khan	Chowkidar	03	1/01/1984	SDW Bannu	175592	22201-1158790-9	0332-7909156
2	Aslam Nawaz	Mir Alam Khan	W/C	03	1/01/1987	SDW Bannu	285816	22201-6509037-9	0335-8363427
3	Habib Rahman	Akbar Zaman	W/C	03	1/01/1965	SDW Bannu	182009	22201-3989546-7	0333-9732404
4	Abdus Samed	Taradad Khan	Sweeper	03	1/01/1979	SDW Bannu	50379176	11101-6860762-7	0333-9743286
5	Qamar Ali Khan	Shah Wali Kha	Mail	03	1/01/1976	SDW Bannu	50411683	22201-6389514-9	0333-9765265
6	Sher Khan	Ardali Khan	Chowkidar	03	2.2.2001	SDW Bannu		11101-0822514-5	
7	Majeed Ullah	Radad Khan	N/Qasid	03 SSC	28/02/1998	SDW Bannu	50411546	11101-3366665-9	0332-7884187

[Signature]
PRINCIPAL
5/11/2022

GHS BAKA KHEL

SDW BANNU

Date: 5/11/2022

بعدالت فاسد اس کی اصلاح کے لئے



تعداد 2 مخانبہ اس کے لئے
 بنام ایجوکیشن

عبداللہ

مورثہ
 مقدمہ
 دعوی
 جرم

باعث تحریر آنکے

حقوق مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
 آن مقام کے لئے
 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 ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زراہیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
 اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت
 مقدمہ مذکور 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 بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے
 اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے
 سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔
 کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

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ماہ اگست

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المرقوم

دعا دعا واہ العباد

Asst. Secy
 Govt. of Punjab