

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Amended Service Appeal No. 1270/23

INAYAT ULLAH SPST GPS ALAGRAM DISTRICT BUNER

“APPELLANT”

VERSUS

DISTRICT EDUCATION OFFICER (M) BUNER AND OTHERS

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APPELLANT

INAYAT ULLAH SPST
GPS Alagram

Through counsel

Ashraf Ali Buner

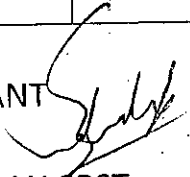
Advocate High Court

Office Address: District Court

Daggar District Buner

Cell No: 0333-9692812

Dated:07-07-2023


ASHRAF ALI
Buner
Advocate High Court

①

IN THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA
PROVINCE AT PESHAWAR

AMENDED SERVICE APPEAL NO. 1270 /2023

Inayat Ullah S/O Muhammad Dildar R/O Village Takhta Band Tehsil Gagra
District Buner/SPST GPS ALAGRAM Tehsil Chagharzi District Buner

“APPELLANT”

VERSUS

- 1) District Education Officer (M) E & S Education Department, District Buner at Daggar.
- 2) Sub Divisional Educational Officer (M) E & S Education Department Tehsil Chagharzi Distt” Buner at Budal (GPS Budal Maira)
- 3) Director Education KP Province at Peshawar.
- 4) Secretary Education KP Province at Secretariat at Peshawar.
- 5) District Account Officer Buner at Daggar.

Service Appeal under section 4 of the Services Tribunal ACT 1974
against the Impugned Transfer/Adjustment office order dated
17-02-2023 of DEO (M) Buner & Showcause Notice dated 20-02-2023,
Endst; No.802-05, impugned order endorse No. 2590-96 dated 31.05.2023
(issued in back date) and notice No 3046 dated 20.06.2023 by respondent
No.1 in utter disregard of the Law & Rules even the Khyber Pukhtoon
Khwa appointment, posting & Transfer policy of Doctors, Lecturers &
Teachers 2011 with mala fide intention, ill-will & personal graduges
under political influence.

PRAYER IN APPEAL

On acceptance of the instant service appeal the impugned orders Endst; No.802-5 dated 17-02-2023 of DEO (m) Buner & Show Cause Notice Endst. No.873-77 dated 20-02-2023, Endst; No.802-05, impugned order endorse No. 2590-96 dated 31.05.2023 issued by respondent No.1 with mala fide intention, ill-will & in violation of the relevant rules & law, being illegal & arbitrary in nature may please be set aside from the date of issuance & the respondent may please be directed to transfer appellant to GPS Swari uc Rega with immediate effect & release salary of petitioner since 21-12-2022 till date & onward further relief to which the appellant is otherwise entitled under the law may also be granted though not specifically prayed in the instant appeal may also be granted in favour of appellant

RESPECTFULLY SHEWETH:

FACTS:

- 1) That the appellant has been serving in education department since 17-10-2007 as PST and then was promoted to SPST in 2018.
- 2) That appellant has been performing his duty at GPS Alagram since 29-10-2019 which is situated in tehsil chagharzi UC Batara as appellant belong to UC Rega Tehsil Gagra but due to political influence appellant was adjusted/transferred to GPS Alagram in violation of Section 3 of appointment, deputation, posting & transfer policy of Teachers, lecturers, instructors & Doctors regulatory, Act,2011 which is evident from frequent transfer, cancellation & corrigendum orders of appellant. (copies of adjustment,transfer,corrigendum & cancellation of appellant are attached as Annexure "A").
- 3) That appellant performing his duty efficiently in education department.
- 4) That the behavior of DEO (M) Buner is discriminatory with the appellant as the appellant has taken no mistake but due to political influence, appellant was transferred/adjusted to GPS Alagram in violation of transfer & posting Act-2011 as vacancies of SPST were lying vacant in UC Rega and adjacent UCs as well.

- 5) That appellant was interested in higher education and had made apply for MSc HPE to Sarhad University at Peshawar & before confirmation of admission appellant made application for NOC to DEO (M) Buner 26-03-2021 & on 06-04-2021 confirmation of admission in MSc HPE was issued by the university. (copies of application & confirmation letter are attached as Annexure "B" and "C")
- 6) After confirmation of appellant admission in Sarhad University appellant made application for two years study leave which was submitted to office of DEO (M) Buner on 27-04-2021 and later on reminder was made to DEO (M) Buner on 08-07-2021 but no progress was made on the various applications. (copies of applications & copy of Dairy are attached as Annexure "D")
- 7) That on 05-11-2021 appellant made another application for E.O.L (for study leave) but in vain so respondent No.1 granted E.O.L on 01-02-2022 w.e.f 01-03-2022 to 20-12-2022 without pay but unfortunately the admission of appellant was not restored due to long absence of appellant and on 07-12-2022 appellant made application to respondent No.2 for intimation and transfer of appellant from GPS Alagram to GPS Swari on 07-12-2022 prior to expiry of E.O.L as appellant E.O.L expiry date was 20-12-2022 and the said application was forwarded to DEO (M) Buner through proper channel which was received by PA to respondent No.1 on 16-12-2022. (copies of applications of E.O.L dated 05-11-2021, Leave Sanction dated 01-02-2022 and application intimation & transfer dated 07-12-2022 are attached as Annexure "E")
- 8) That after intimation/transfer application dated 07-12-2022 which was forwarded to respondent No.1 & 2 through proper channel appellant took charge on 21-12-2022 after expiry of E.O.L on 20-12-2022 and this regard charge report was signed by the Head Teacher on 21-12-2022 and the original charge report was submitted to respondent No.2 through Ghanim Ullah SPST GPS Budal Maira on 21-12-2022. (copy of charge report is attached as Annexure "F")
- 9) That the behavior of DEO (M) Buner is highly discriminatory with appellant and the above mentioned procedure which was adopted by appellant after expiry of appellant E.O.L were ignored by the DEO (M) Buner as appellant has submitted all the documents to the concern authorities/officers but DEO (M) Buner in violation of rules/regulations and transfer/posting Act-2011 issued an illegal transfer order dated 17-02-2023 without

any legal cause.(copy of transfer order dated 17-02-2023 is attached as Annexure "G")

- 10) That the impugned transfer/adjustment order dated 17-02-2023 endst: No.802-05 is illegal and against the law procedure and have no effect on appellant.
- 11) That the impugned order dated 17-02-2023 was neither communicated to appellant nor sent to the appellant which further indicate the ill-well and discrimination of DEO (M) Buner/respondent No.1 with appellant.
- 12) The appellant has already taken his charge as SPST at GPS Alagram after expiry of E.O.L and in this regard application for transfer and charge report have already submitted to the concern authorities but DEO (M) Buner ignored all the documents and issued an illegal transfer order dated 17-02-2023 and after the said impugned transfer order on next working day i-e 20-02-2023 visited GPS, Gujjar Abad and afterword an illegal an illegal show cause notice was issued to the appellant which is enough to show his malafide with the appellant (copy of show cause notice is attached as Annexure "H").
- 13) That respondent No.1 had issued promotion order of PST Teachers on 09-01-2023 & corrigendum in the said order was made on 23-01-2023 in violation of transfer, posting & promotion ACT-2011 as appellant was promoted to SPST on 2018 and transfer application of appellant was pending before the respondent No.1 which is enough to prove the ill-well and mala fide intentions in favour of appellant. (copy of promotion & corrigendum are attached as Annexure "I")
- 14) The appellant has already submitted reply/para wise comments of the said show cause notice (copy para wise comments are attached as Annexure "J").
- 15) That the impugned transfer/adjustment order 17-02-2023 and the show cause notice dated 20-02-2023 are illegal and null and void in the eyes of law.
- 16) That appellant filled departmental appeal against the impugned transfer order dated 17-02-2023 and show cause notice to respondent No.3 against respondent No.1 on 01-03-2023 vide diary No.834/01-03-223 but no progress was made yet.(copy of departmental appeal is attached as Annexure "K")
- 17) That both the above mentioned transfer/adjustment order and show cause notice are liable to be cancelled in the best interest of justice and law.

4-A

- 18) That as per section-3 of transfer and posting act-2011 the appellant may please be transferred /adjusted to GPS Sawari UC Rega Tehsil Gagra.
- 19) That the post of SPST at GPS Sawari UC Rega & GPS No.2 Rega are still vacant and appellant is deserving to be appointed/transferred to GPS Sawari or GPS No.2 Rega UC Rega as soon as possible.
- 20). That appellant performing his duty at GPS Alagram after expiry of E.O.L after intimation to respondents but the salary of appellant has been illegally stopped till now which is the violation of fundamental rights of appellant.
- 21) That respondent No 1 during the pendency of instant appeal after getting notice from this Hon'able Court issued impugned order No. 2590-96 dated 31.05.2023 in back date which has been sent to appellant on 20.06.2023 through post office and received by brother of appellant on 26.06.2023 which is enough to prove that the impugned order was issued in back date. (Copy of order and envelop is attached as Annexure-O).
- 22). That respondent No 1 issued and other notice No 3046 Dated 26.06.2023 to appellant prior to communication of the impugned order No. 2590-96 dated 31.05.2023. (Copy of Notice is attached as Annexure-P).
- 23). That appellant has filed Departmental appeal to director E&SE Education Khyber Pakhtunkhwa dated 27.06.2023. (Copy Departmental appeal is attached as Annexure-P).
- 24). That the amended instant appeal is filing under the instruction of this Hon'able court dated 03.07.2023.

GROUNDS

- A) That the impugned orders mentioned above of respondent No.1 are against law & policy and even have been issued in utter disregard of the law,rules laid down for, even under the K.P civil Servants Act 1973 / KP Govt; Servants (E & D) Rules 2011, hence is not tenable under the-law but is liable to be set aside from the date of it issuance, being not existed
- B) That the impugned orders are also contrary to norms and moved laid down in the KP appointment, deputation, posting and transfer of teachers, instructors and Doctors regularity act 2011 hence the impugned orders are not binding on

4-B

appellant but are liable to be set aside from the date of issuance.

- C) That the behavior of respondent No.1 is highly discriminatory with appellant which is evident from the acts of respondent No.1.
- D) That before expiry of E.O.L of appellant , appellant had informed respondents through proper channel and took charge at GPS Alagram on 21-12-2022 accordingly but respondent No.1 had ignored all valid documents and utter disregard of rules and regulations issued impugned transfer order dated 17-02-2023 as appellant E.O.L had expired on 20-12-2022.
- E) That the mala fide of respondent No.1 is evident from the acts and behavior of respondent No.1 because after issuance of impugn transfer order dated 17-02-2023 respondent No.1 on the next working day intentionally with mala fide visited GPS Gujjar Abad and issue show cause notice to appellant as the impugn transfer order was neither sent nor communicated to appellant.
- F) That later on respondent No.1 called applications for transfer of teachers and appellant also filed application for transfer as per rules and regulation to respondent No.2 on 15-03-2023 being most senior SPST and performing his duty as SPST in GPS Alagram tehsil Chagharzi since 29-10-2019 and as per section 3 of transfer & posting etc Act 2011 transfer of appellant to UC Rega that is GPS Swari was mandatory but respondents in utter this regards of law did not transfer appellant from GPS Alagram to UC Rega which is violation of law rules and regulations.(copy of transfer alert, transfer application are attached as Annexure "L")
- G) That SPST post are still vacant in UC Rega but respondent No.1 intentionally did not transfer appellant to GPS Swari or GPS Rega No.2 of UC Rega as appellant belong to UC Rega.
- H) That respondents have stopped salary of appellant since 21-12-2022 and appellant time and again requested to respondents to release salaries of appellant but in vain so appellant made application to respondent No.1 to release salary of appellant from 21-12-2022 but the said application is still pending without any progress. (copy of application is attached as Annexure "M").
- I) That the stoppage of salary is violation of fundamental rights of appellant as appellant performing his duty as SPST in GPS

4-C

Alagram since 21-12-2022 accordingly. (copies of attendance register etc are attached as Annexure "N").

- J) That the appeal of appellant was admitted for regular hearing dated 07.06.2023 and notice was issued to respondents and respondent No 1 after getting notice of the instant appeal issued and other order No 2590-96 dated 31.05.2023 which is the violation of law, rules and regulations.
- K) That the impugned order dated 31.05.2023 was issued in back date after getting notice from this Hon'able court which is evident from the fact that the impugned order was sent to appellant on 20.06.2023 from post office.
- L) That respondent No 1 had issued the transfer order No. 2816 dated 10.06.2023 of Mr. Muhammad Habib SCT etc in back date which is evident from the attendance register of GHSS Tor Warsak to GHSS Gadezi. (Copy of transfer order and attendance is attached as Annexure-R).
- M) That the malafide in ill-will and political influence of respondent No. 1 against the appellant the appellant is proved from the behavior of respondent No 1 against the appellant as Mr. Rahman Bahadar PST was involved in irregular practice in had been transferred by the respondent No. 1 on disciplinary ground but later on the same order was withdrawn by the respondent No. 1 but appellant had committed no wrong but was punished for committing no offence.
- N) That the appellant was illegally punished only on political pressure and personal grudges. (Copy attached as Annexure-S).

So it is most humbly prayed that on acceptance of this service appeal the relief sought in the prayer portion of the instant service appeal may please be granted in favour of appellant and the impugned transfer/adjustment order dated 17-02-2023 and show cause notice issued to the appellant on 20-02-2023 impugned order 2590-96 dated 31.05.2023 and notice 3046 dated 26.06.2023 by respondent No 1 may please be cancelled and the appellant may please be transferred/adjusted to GPS Sawari UC Rega as per section 3 of transfer/posting act-2011 in the best interest of justice and fair play and the salary of appellant may please be released.

4-D

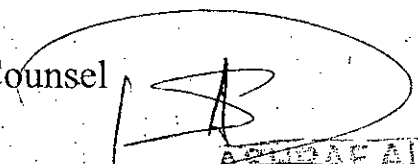
Any other relief to which the appellant is otherwise intitled may please also be graciously be granted in favour of appellant if not specifically prayed for.

Appellant



Inayat Ullah SPST
GPS ALAGRAM
Tehsil Chaghaezi
Distt" Buner

Through Counsel



Ashraf Ali Buner
advocate High Court
Office at District courts
Dagar Distt" Buner
Cell No. 03339692812

CERTIFICATE

It is certify that no such like appeal on the subject has been filled any where in this hon; Service Tribunal or in any other competent court or forum, or pending any court or has been decided.

5

IN THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA
PROVINCE AT PESHAWAR

AMENDED SERVICE APPEAL NO. 1270 /2023

Inayat Ullah

Versus

D.E.O (M) Buner etc

ADDRESSE OF PARTIES


- 1) Inayat Ullah S/O Muhammad Dildar R/O Village Takhta Band Tehsil Gagra District Buner/SPST GPS ALAGRAM Tehsil Chagharzi District Buner


APPELLANT

1. District Education Officer (M) E & S Education Department, District Buner at Daggar.
2. Sub Divisional Educational Officer (M) E & S Education Department Tehsil Chagharzi Dist" Buner at Budal (GPS Budal Maira)
3. Director Education KP Province at Peshawar.
4. Secretary Education KP Province at Secretariat at Peshawar.
5. District Account Officer Buner at Daggar.


"RESPONDENTS"

Through Counsel

Appellant 
Inayat ullab SPST
GPS Alagram


Ashraf Ali Buner
Advocate High Court
0333 9692 812

(6)

**IN THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA
PROVINCE AT PESHAWAR**

AMENDED SERVICE APPEAL NO. 1270 /2023

Inayat Ullah VERSUS District Education Officer (M) Buner etc

Amended application for ad interim relief in shape of suspending the impugned orders endst; No.802-05 dated 17-02-2023 of DEO (M) Buner and show cause notice dated 20-02-2023 impugnd order No 2590-96 dated 31.05.2023 and notice No 3046 dated 26.06.2023 issued by respondent No.1 and the respondent may please be directed to release the salary of appellat/petitioner since 21-12-2022 till date and onward.

Respectfully sheweth;

- 1) That the impugned orders has mentioned above have so for not been implemented by appellat and departmental appeal of petitioner is still pending before respondent No.3.
- 2) That impugned orders are illegal and having no base but totally base on mala fide intentions and ill-well of respondent No.1.
- 3) That the impugned orders are based on administrative ground and the pre requisites under the E & D rules 2011 have not been full filled.
- 4) That the impugned orders also in violation of transfer, deputation etc ACT 2011 KP.
- 5) That entire contents of the service appeal on the subject may please be considered with this application.
- 6) That the stoppage of salary of petitioner is sheer violation of rules regulations and precedents of apex court of Pakistan.
- 7) That further points would be advanced at the time of arguments before the Tribunal.

6-A

So it is most humbly prayed that on acceptance of this application the impugned orders mentioned above in title of application may please be suspended and the respondents may please be directed to release the salaries of petitioner since 21-12-2022 with immediate effect.

APPELLANT

Inayat Ullah SPST
GPS Alagram

Through counsel

Ashraf Ali Bunerī
Advocate High Court

Office Address: District Court
Daggar Distt' Buner
Cell No.03339692812

Before the Service Tribunal Khyber Pakhtunkhwa Peshawar

Amended Service Appeal No. 1270 /23

(7)

INAYAT ULLAH SPST GPS ALAGRAM DISTT" BUNER

"APPLEANT"

VERSUS

DISTT" EDUCATION OFFICER (M) BUNER and Others

APPIDAVIT

I INAYAT ULLAH S/O MUHAMMAD DILDAR R/O Vill" Takhta Band Tehsil Gagra Distt" Buner/ SPST GPS Alagram Distt" Buner, do hereby solemnly affirm and declare on oath that the entire contents of this amended Service Appeal are true and correct. And that no service appeal on the same subjects matter or issue has ealier been filed by appellant on the same subject is pending before this honour Tribunal or in any other forum elsewhere and this amended appeal is filed under the instruction of this Hon'able court dated 30.07.2023.



DEPONENT

INAYAT ULLAH/DEPONENT

Annexure A

8



OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT EDUCATION OFFICER
BUNER

OFFICE ORDER

As approved by the competent authority Mr. Muayyadh SPSI GPS is hereby
hereby adjusted at GPS Alagpur on expiry of leave with effect from 01/12/2019
by the Sub-Divisional Education Officer Male, Buner vide his office No. 551/2019
39/10/2019

Note :-

1. Charge report should be submitted to the concerned.
2. Necessary entry to this effect should be made in his S Book accordingly.

(IBZAR MUHAMMAD)
DISTRICT EDUCATION OFFICER (M)
BUNER

Endst. No. 7551-53

Dated 12/10/2019

Copy is forwarded for information to the:

1. District Accounts Officer Buner at Daqar
2. Sub-Divisional Education Officer (M) Gagra Buner.
3. Official concerned.

37/10/2019

CTC
ASIRAF ALI
Buneri
Advocate High Court

CTC
IBZAR MUHAMMAD
DISTRICT EDUCATION OFFICER (M)
BUNER
ASIRAF ALI
Buneri
Advocate High Court

10/1/20

BETTER COPY

Better copy (2)

OFFICE ORDER

is approved by the competent authority Mr. Inayat Ullah SPST GPS Swari hereby adjusted at GPS Alagram on expiry of Leave w.e.f 05-05-2019 to 05-10-2019 by Sub Divisional Education Officer Male Gagra Buner vide his office order No.97 dated 09/10/2019

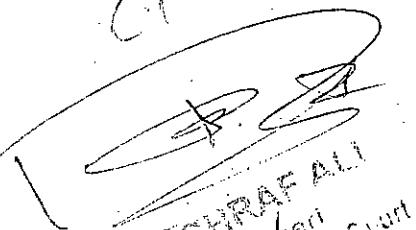
IBZAR MUHAMMAD

District Education Officer


Buner

Endst. No. 712-15/ Dated 7/3/2020

CTC


ASHRAF ALI
Buneri
Advocate High Court

CTC


ASHRAF ALI
Buneri
Advocate High Court

(9)

OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510468
EMAIL: cdobuner@gmail.com

K P E E O

MEMORANDUM

In partial modification to this office Endst: No. 7551-53 dated 12/10/2019 please read
GPS Takhtaband instead of GPS Alagram in R/O Inayatullah SPST in the best interest of public
service.

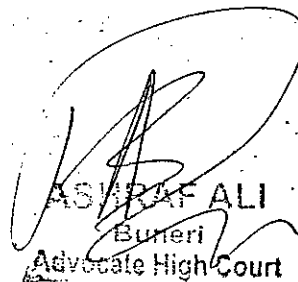
(MUHAMMAD AZAM KHAN)
DISTRICT EDUCATION OFFICER
(MALE) BUNER

Order No. _____ / Dated _____ / 2020.

- Forwarded for information to the:
1. District Accounts Officer Buner.
 2. District Monitoring Officer Buner.
 3. CDEO (Male) Gagra District Buner.
 4. Teacher/ Head Teachers concerned.

DISTRICT EDUCATION OFFICER
(MALE) BUNER

CTC


ASIRAF ALI
Buneri
Advocate High Court

NOTIFICATION

... is hereby cancelled in the best interest of public...

INSTITUTION OF AMERICA
DISCOUNT BANK

7/7-15 Dated 7/3 2020

- For information to the
- Accounts Officer Duneri
- Monitoring Officer Duneri
- Muz Gagra District Duneri
- Teachers concerned.

[Handwritten mark]

DISCOUNT BANK
DUNERI

[Signature]
ASHRAF ALI
 Duneri
 Advocate High Court

BETTER COPY

10

CANCELLATION

Corrigendum order of this office Endst. No. 660-63 dated 02/03/2020 in r/o

Mr. Inayat Ullah SPST is hereby cancelled in the best interest of public service.

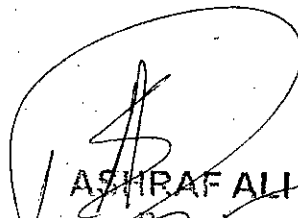
MUHAMMAD AZAM KHAN

District Education Officer

Buner

Endst. No. 712-15 / Dated 7/3/2020

CTC


ASHRAF ALLI
Buner
Advocate High Court

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Handwritten text, possibly a date or reference number, mostly illegible.

CTC

ASHRAF ALI
Buneri
Associate High Court

12

Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

Sl. No. Adm/2021/050/001

Date: 6 April 2021

To: Hon. Member
Mechanical Director
Spring-2021 Batch
Faculty of Health & Physical Education

Subject: Confirmation of Admission in Msc Health & Physical Education

Dear Sir/Madam,

It is to inform you that based on your merit position and consequent upon recommendation of Admission Committee, the Competent Authority is pleased to confirm your admission in Spring-2021 batch in Msc Health & Physical Education subject to verification of your documents from the concerned Board University.

You are advised to contact your Departmental Coordinator for allotment of Section and to seek necessary academic guidance.

With best regards,

Dr. Director (Health & Physical Education)
Dr. Director (Health & Physical Education)

- 1. The Chairman, Admissions Committee
- 2. The Director, Department of Sports Sciences & Physical Education
- 3. The Deputy Controller of Examinations
- 4. The Physio Vice-Chancellor
- 5. The Post-Registrar
- 6. Student Personal File

CTC
ASHRAF ALI
Advocate High Court

حکومت ایما - ڈائریکٹ ایگریکچرل انجینئرنگ
 اور سائنس DEEC دھرم پورہ ملے ہوئے

عنوان :- پروفیسر ایف ایچ ایم ایس سی HPE
 From: ...

ایٹل کے دست دیل کرنا ہے

- 1) یہ کہ سائیل 17 سے تائیل 25 تک SE & E میں کچھ عورتوں کو اس میں شامل کرنا ہے۔
- 2) یہ کہ سائیل 18 سے تائیل 25 تک SPST اور ان ضمنی اس میں شامل کرنا ہے۔
- 3) یہ کہ سائیل 26 سے 30 تک پچھلے دور میں شامل کرنا ہے۔
- 4) یہ کہ سائیل 31 سے 35 تک پچھلے دور میں شامل کرنا ہے۔
- 5) یہ کہ سائیل 36 سے 40 تک پچھلے دور میں شامل کرنا ہے۔
- 6) یہ کہ سائیل 41 سے 45 تک پچھلے دور میں شامل کرنا ہے۔
- 7) یہ کہ سائیل 46 سے 50 تک پچھلے دور میں شامل کرنا ہے۔
- 8) یہ کہ سائیل 51 سے 55 تک پچھلے دور میں شامل کرنا ہے۔
- 9) یہ کہ سائیل 56 سے 60 تک پچھلے دور میں شامل کرنا ہے۔
- 10) یہ کہ سائیل 61 سے 65 تک پچھلے دور میں شامل کرنا ہے۔
- 11) یہ کہ سائیل 66 سے 70 تک پچھلے دور میں شامل کرنا ہے۔
- 12) یہ کہ سائیل 71 سے 75 تک پچھلے دور میں شامل کرنا ہے۔
- 13) یہ کہ سائیل 76 سے 80 تک پچھلے دور میں شامل کرنا ہے۔
- 14) یہ کہ سائیل 81 سے 85 تک پچھلے دور میں شامل کرنا ہے۔
- 15) یہ کہ سائیل 86 سے 90 تک پچھلے دور میں شامل کرنا ہے۔
- 16) یہ کہ سائیل 91 سے 95 تک پچھلے دور میں شامل کرنا ہے۔
- 17) یہ کہ سائیل 96 سے 100 تک پچھلے دور میں شامل کرنا ہے۔

AS GRAPALI
 10/10/20

AS GRAPALI
 Senior
 Advocate - High Court

Head Teaching
 G.P. Al ...

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محکمہ عدالت عالیہ

سائیل جب ذیل عرض بردار ہے۔

1. یہ کہ سائیل نے MSc HPE کیلئے سرحد لونی ورٹی ہسپتال میں داخلہ کیلئے ایلائی کیا اور مورفہ
 27/4 کو سائیل کا ایڈمیشن کنفرم ہو چکا ہے۔ (کنفرمیشن لیٹر لف ہے)

2. یہ کہ کنفرمیشن ایڈمیشن کے بعد آج صبح صبحان کو لوسا لٹ SDEO صاحبہ گاگرہ دروازہ بند کر دیا
 سائیل لیو رہ چکا ہے۔ (نقل لف ہے)

3. یہ کہ SDEO صاحبہ گاگرہ نے مورفہ 27/4 کو مذکورہ بالا درخواست برائے سائیل لیو آج
 صبحان کو بھیجا جا چکا ہے۔

4. یہ کہ یونیورسٹی میں سائیل کے کلاسز جاری ہیں جو کہ فی الحال آن لائن ہے لیکن یونیورسٹی
 نے ریگولر کلاسز لینے کے بابت میں سائیل کو عتبہ کھا کر دیا ہے۔

5. یہ سٹیڈی لیو سائیل کا قانونی اور آئینی حق ہے کیونکہ سائیل اعلیٰ تعلیم کا عتبہ ہے۔

6. یہ کہ اگر میں سائیل کو سٹیڈی لیو نہیں دی گئی تو میں سائیل کو بہت زیادہ نقصان اور
 ذہنی کوفت کا سامنا کرے گا۔

7. یہ کہ اگر یونیورسٹی سائیل کا داخلہ کینسل کیا تو میں سائیل کو شدید نقصان اور ذہنی کوفت
 پہنچے گا اور سائیل اس بابت قانونی چارہ جوئی کا حق محفوظ رکھے گا۔

لہذا استدعا ہے کہ منظوری درخواست خذ سائیل کو جلد از جلد سٹیڈی لیو
 فراہم کرنا کے احکامات صادر فرمایا جائے۔ تو بڑی بہیمانہ ہوگی۔

سائیل علی

عنایت اللہ SPST

جی پی این آئی گرام ضلع لوئیہ

مورفہ 08-07-2021

Received by PA
 SD DSD (M) Bureh
 08-07-2021

08-07-2021
 BUREH
 DISTRICT JUDGE
 DISTRICT JUDGE
 DISTRICT JUDGE

CTC

ASHRAF ALI
 Bureh
 Advocate High Court

محبت جناب ڈی ای او صاحب ضلع بونیر بمقام سوازی

بوساطت ایس ڈی ای او صاحب سرکل گاگرہ بونیر (16)

مہمان :- درخواست برآمد Extra Ordinary Leave برائے 3 سال بدیں مراد کہ سائیل نے رٹھڑی کیو کیلئے درخواست دی تھی لیکن ناقابل سائیل کو رٹھڑی کیو نہیں ملی اور سائیل نے بعد از درخواست بابت اجازت لینے کے سائیل اعلیٰ تعلیم حاصل کرنا چاہتا ہے اور سرحدیونیورسٹی میں سائیل کو داخلہ مل چکی ہے اور ایک سمسٹر آن لائن مکمل ہو چکا ہے اور اب نومبر 2021ء سے ریگولر کلاسز شروع ہو چکی ہیں۔

جناب عالی!

سائیل صوبہ ذیل عرض ہے۔

- ① یہ کہ سائیل نے RASC HPE کیلئے سرحدیونیورسٹی رتساور میں داخلہ کیلئے ایلان کیا تھا اور حوزہ 06/4/21 کو سائیل کا داخلہ کنفرم ہو چکا ہے۔
- ② یہ کہ کنفرمیشن ایڈمیشن کے بعد آپ صاحبان کو بوساطت SDEO گاگرہ درخواست برآمد رٹھڑی کیو دیا گیا ہے۔
- ③ یہ کہ SDEO صاحب گاگرہ نے بورڈ 27/4/21 کو حذوہ بالا درخواست برائے رٹھڑی کیو آپ صاحبان کو بھیجا جا چکا ہے۔
- ④ یہ کہ یونیورسٹی میں سائیل کے کلاسز آن لائن جاری تھے لیکن یونیورسٹی نے ریگولر کلاسز لینے کے بابت من سائیل کو متنبہ کیا ہے۔ اور ایک سمسٹر آن لائن مکمل ہو چکا ہے۔
- ⑤ یہ کہ اب یونیورسٹی میں یکم نومبر 2021ء سے باقاعدہ کلاسز شروع ہو چکے ہیں اور اب تک سائیل کو رٹھڑی کیو نہیں ملی اور سائیل کا داخلہ منسوخ یعنی ہے جس کی وجہ پر سائیل کو ناقابل تلافی نقصان کا سامنا ہے (نقل ٹائم ٹیل لف ہے)۔
- ⑥ یہ کہ سائیل نے منجگہ تعلیم میں 14 سال ملازمت کی ہے اور مطابق رولز 3 سال تک E.O.L کا حق دار ہے۔ (نقل رولز لف ہے)۔
- ⑦ یہ کہ سائیل کو 3 سال کی E.O.L درکار ہے بصورت دیگر سائیل کو ناقابل تلافی نقصان ہوگا۔ لہذا استدعا ہے کہ سائیل کو E.O.L فراہم کرنا کے احکامات صادر فرمایا جائے۔

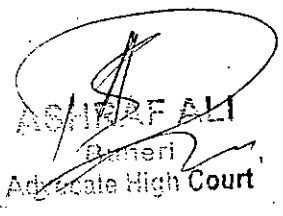
مخلص

عنایت اللہ SPST (سائیل)

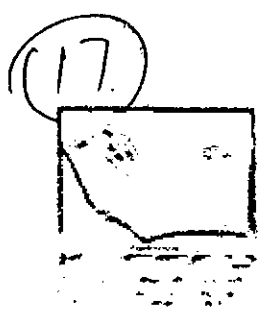
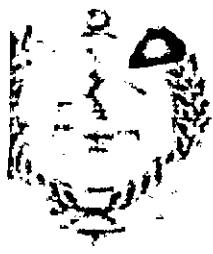
جی پی ایس اے گرام بونیر

حوزہ 05/11/2021

CTC



اصل درخواست بطور ضلع سائیل بونیر لیا اور رٹھڑی میں لے گیا۔
ذرا وصول کیا۔
التزین
06/11/2021



OFFICE OF THE DISTRICT EDUCATION OFFICER
 (MAD) DISTRICT BUNER
 PHONE & FAX NO. 0619 551119
 EMAIL: sbuneri@gmail.com

LEAVE SANCTION

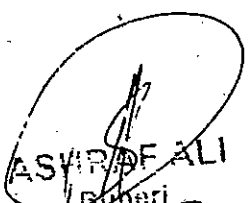
The Competent Authority is pleased to grant sanction of Extra Ordinary leave to Mr. Inayatullah SPST GPS Alagram with effect from 01-03-2022 to 20-12-2022 (9 months & 20 days) without pay as due and admissible to him under the K.ber 11/1981 as revised Leave Rules 1981, as recommended by the SDE(O/M) Gagra vide his office order dated 12/01/2022.

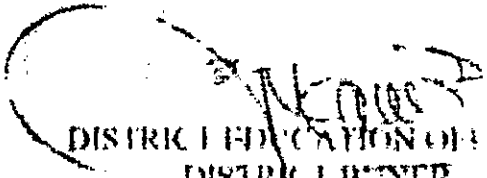
Note: Necessary entry should be made in his Service Book accordingly.

(IFTIKHARUL GHANI)
 DISTRICT EDUCATION OFFICER (MAD)
 BUNER.

Sl. No. 123/87 Date 01/02/2022

- 1. Copy forwarded for information to the:-
- 2. District Accounts Officer Buner at Dainger.
- 3. Election Monitoring Authority EMA Buner.
- 4. SDE(O/M) Gagra.
- 5. Other officials concerned.

CTC

 ASWIF ALI
 Buner
 Advocate High Court


 DISTRICT EDUCATION OFFICER (MAD)
 DISTRICT BUNER
 11/2/2022

عنوان :- درخواست برآمد تبادله از GPS الہ گرام تا GPS سواتی تحصیل (2012)

جناب عالی!

گزارش کی جاتی ہے کہ میں GPS الہ گرام تحصیل درازی میں
محنت SPST اپنی ڈیوٹی سرانجام دے رہا ہوں۔ یکم مارچ 2022 سے 20 دسمبر
2022 تک E.O.A. عمار دفتر سے لی گئی۔ اب چونکہ 20 دسمبر کو میری طبی پوری ہو چکی
اب میں جی پی ایس الہ گرام سے GPS سواتی کو تبادله کرنا چاہتا ہوں۔ کیونکہ
الہ گرام میرے رہائش سے 28 کلومیٹر دور ہے اور آئے جاتے میں مشکلات ہے۔
لہذا آج صابان میری کرنی ہے درخواست پر سمجھدارانہ طور فرما کر دیکھو
کیا جائے۔

نوٹ :- جی پی ایس الہ گرام میں اکتوبر 2019 سے ڈیوٹی سرانجام دے رہا ہوں۔

العارضہ
عنایت اللہ SPST

The application is
based on reality.
forwarded for N/A
to the high ups.

Head Teacher
GPS Alagram Buner
7/12/2022
Subdivis. Officer
Buner
Circle Batawa Buner.

جی پی ایس الہ گرام ہندو پورہ
تاریخ 07/12/2022
CTC

Submitted to
DEO (M) Buner
for favorable consideration
Please.

Sub Divisional Officer
(M) PWT - Hagarzal
Distt. Buner

Received by PA
To Des (M) Buner
Javed
16/12/2022

THE ALI
Buner
High Court

Annexure 2

حصہ خارج رپورٹ

18

تعداد کی حوالی کے لئے کسی عبارت اللہ SPST کی حوالی
الہ گرام جو یکم مارچ 2022 سے 20 دسمبر 2022 تک E.O.L کی ہے
آج صبح 8:30 بجے کون کنڈا میں حاضر کی اور اپنے نمبر لکھا
ہو گیا ہے۔

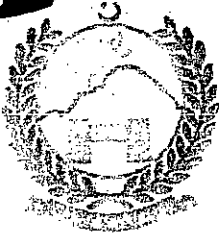
Head Teacher
GFS Alagram Buner
21/12/2022

جی ایس الہ گرام بونیر
21-12-2022

نوٹ: اصل درخواست بدست غنیم اللہ SPST جی ایس الہ بونیر SDEO آفس
میں جمع کیا۔
21-12-2022

ASHRAF ALI
Buneri
Advocate High Court

ASHRAF ALI
Buneri
Advocate High Court



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510468
EMAIL: edobuner@gmail.com



OFFICE ORDER.

Consequent upon the expiry of E.O. leave on 20/12/2022, the Competent Authority is pleased to adjust Mr. Inayatullah SPST at Govt. Primary School Gojjar Abad in the best interest of public service.

Note :-

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

(IFTIKHER UL GHANI)
DISTRICT EDUCATION OFFICER (M)
BUNER.

Endst.No. 892-05 / 1

Dated 17/02 /2023.

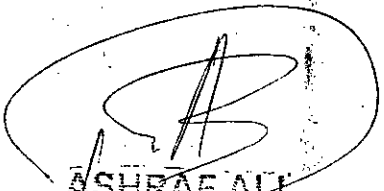
Copy is forwarded for information to the:-

1. District Accounts Officer Buner at Daggar.
2. District Monitoring Officer Buner
3. Sub Divisional Education Officers concerned (M) Buner.
4. Official concerned.


DISTRICT EDUCATION OFFICER (M)
BUNER

17/1/23

CTC


ASHRAF ALI
Buner
Advocate High Court

21

SHOW CAUSE NOTICE

I, **IFTIKHAR UL GHANI**, District Education Officer (M) Buner, as a Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve upon you, **Mr. Inayatullah SPST, under-adjustment at GPS Gujar Abad tehsil Khudo Khel District Buner**, this show cause notice as follow:-

1. That on expiry of your Extra Ordinary Leave (without pay) issued vide this office No.483-87 Dated 01/02/2022 you neither informed your concerned SDEO nor this office in order to adjust you against any vacant SPST post and remained absent w.e.f 21/12/2022 till date, however, reportedly you adjust yourself in a certain school without informing the SDEO and proper order/approval of the undersigned, thereby evading the authority of the DEO, which is utter violation of rules and regulations.
2. That the SDEO concerned sent a letter to this office requesting therein to adjust you after expiry of your leave. In the light of the aforementioned letter you were adjusted at GPS Gujar Abad Tehsil Khudo Khel vide this office order No. SO2-05 dated 17/2/2023, where you have not taken over charge as yet.
3. That after your adjustment, you pressurize the undersigned to adjust you at a nearest station, which was not possible due to available vacancies, owing to which you started blackmailing and defaming the undersigned on social media, which is violation of the Conduct Rules 1987 sub-rules (21), (24), (25) and 34-A sub-rules (1)&(2).
4. That you blatantly defame the undersigned and disseminate perverse comments/information through social media on shaky and flimsy grounds, reprimanding, tongue-lashing and condemning official business of the Government as well as the undersigned just to instigate and instigate teachers fraternity and general public against this office, which is an utter violation of Conduct Rules 1987, sub-rules (21), (24), (25) and 34-A sub-rules (1)&(2) of the rules ibid and ESD Rules 2011.
5. That you stigmatize, malign and slag off the character of certain officers of this Department including the undersigned without any proof by posting unauthorized, baseless information through various comments on various posts on facebook.
6. That you are guilty of continuously creating embarrassing situation for the Govt. as well as Elementary and Secondary Education Department by propagating falsification and misrepresentation of facts and figures.
7. That you are guilty of professional dishonesty, abatement, inefficiency and misconduct under Rule-3 (a) (b) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 read with Conduct Rules 1987, sub-rules (21), (24), (25) and 34-A sub-rules (1)&(2) of the rules ibid.
8. That you have ceased to be efficient and are guilty of misconduct and liable to be proceeded under the rules for the charges given hereinabove.

2. In terms of Rule-5 (a) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 I, as a Competent Authority dispense with the inquiry and serve you with a showcause notice under Rule-7 of the ibid rules.

3. On reasons of the above you appear to be guilty of inefficiency and misconduct under Rules 3 (a) and (b) defined in Rules 2 (i), (j), (k) and (v) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 read with rules (21), (24), (25) and 34-A sub-rules (1)&(2) of Conduct Rules 1987 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.

4. As a result thereof, I, as the Competent Authority, have tentatively decided to proceed against you under the above mentioned rules. You are, therefore, required to show cause as to why one of the major/minor penalties specified in **Rule 4 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011**, 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 its delivery, it shall be presumed that you have no defense to put in and in that case Ex-parte action will be taken against you, which may culminate in your removal from service.

(IFTIKHAR UL GHANI)
DISTRICT EDUCATION OFFICER (M)
BUNER

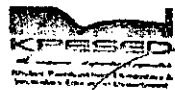
Encls: No. 1-11 Dated 21/12/2023

Copy forwarded to:-

- 1- The Director of Elementary and Secondary Education Khyber pakhtunkhwa Peshawar.
- 2- SDEO (M) Khado Khel and Chagharzi.
- 3- DMO, EMA Buner.
- 4- The Official Concerned.
- 5- Master File

CTC
Advocate High Court
Buner

[Handwritten signature]



OFFICE ORDER.

Consequent upon the recommendation of the Departmental Promotion Committee meeting held on 27/12/2022 and pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(B&A/1-18/E&SE2012 Dated 11/07/2012 Finance Department Endst.No. SO(FR)/FD/10-22(E)2010 Dated 16/07/2012, the following PSTs are hereby promoted and posted to the post of SPSTs in BPS 14 (22530-1740-74730/-) plus usual allowances as admissible under the rules on regular basis with immediate effect under the existing policy of the provincial Govt on the terms and conditions given below.

S.No	Name of official	CNIC NO.	Present Place of Posting		School Where Posted		Remarks
1	Muhammad Zada	15101-8752172-7	GPS	Jabi Panjtar	GPS	Jabi Panjtar	A,V.P
2	Hazrat Rahman	15101-1979980-1	GPS	Dargalai	GPS	Bargajo	A,V.P
3	Navid Ahmad	15101-3294173-3	GPS	Ramzai	GPS	Ramzai	A,V.P
4	Kausar Ali	15101-8688662-3	GPS	Bajkata	GPS	Bajkata	A,V.P
5	Asad Iqbal	15101-7098445-3	GPS	Kawsar Abad(Cha)	GPS	Kawsar Abad(Cha)	A,V.P
6	Bakht Nawab	15101-2582935-9	GPS	Shalbandai No.1	GPS	Budal	A,V.P
7	Zafar Ul Hassan	15101-0353057-3	GPS	Budakass	GPS	Budakass	A,V.P
8	Abdul Islam	15101-4258578-9	GPS	Mian Dand	GPS	Mian Dand	A,V.P
9	Saif Ullah	15101-5165991-1	GPS	Dand Maira	GPS	Dand Maira	A,V.P
10	Khaliq Noor	15101-7505063-1	GPS	Agarai No.1	GPS	Mirzakai	A,V.P
11	Asar Khan	15101-6511649-7	GPS	Manai Takhta Band	GPS	Manai Takhta Band	A,V.P
12	Akbar Ali Khan	15101-9643767-5	GPS	But Amazi	GPS	But Amazi	A,V.P
13	Niaz Muhd Khan	15101-0843297-7	GMPS	Paraghahay	GPS	Bafo Khan	A,V.P
14	Gohar Ali	15101-0706452-9	GPS	Toot Banr	GPS	Toot Banr	A,V.P
15	Afsar Ali	15101-6381531-5	GPS	Kitawar	GPS	Kitawar	A,V.P
16	Said Jamil Shah	15101-1222944-7	GPS	Kiraramal	GPS	Kiraramal	A,V.P
17	Fazal Muhammad	15101-3934259-5	GPS	Zahoor Abad	GPS	Zahoor Abad	A,V.P
18	Rahman Shah	15103-0339175-7	GPS	Namdar Agarai	GPS	Mirzakai	A,V.P
19	Safdar Ali	15101-4911958-5	GPS	Rega No.2	GPS	Rega No.2	A,V.P
20	Noor Ul Khaliq	15101-6792571-9	GPS	Nagrai	GPS	Nagrai	A,V.P
21	Aziz Ahmad	15101-1759170-1	GPS	Toti Dehrai	GPS	Toti Dehrai	A,V.P
22	Sayed Wakeel Shah	15104-0339296-7	GMPS	Aronay	GPS	Mulakai	A,V.P
23	Bakht Sher	15101-4561569-1	GPS	Kandar Langer	GPS	Kandar Langer	A,V.P
24	Ghulam Hasan	15101-4253752-9	GPS	Torwarsak No.1	GPS	Torwarsak No.1	A,V.P
25	Zamarud Khan	15101-2860856-7	GPS	Malang Dara	GPS	Malang Dara	A,V.P
26	Sohail Ahmad	15101-6181157-3	GPS	Sher Ali Kotay	GPS	Sher Ali Kotay	A,V.P
27	Imran Zada	15101-1993454-1	GPS	Ashezo Nawekalay	GPS	Ashezo Nawekalay	A,V.P
28	Naseeb Khan	15101-7917576-1	GPS	Kalakhela (Chamla)	GPS	Kalakhela (Chamla)	A,V.P
29	Farman Ullah	15101-7339136-7	GPS	Banda Tangay	GPS	Banda Tangay	A,V.P
30	Wali Ullah	15101-3990641-9	GPS	Rega No. 2	GPS	Rega No. 2	A,V.P
31	Zafar Ali	15101-0408399-3	GPS	Malakpur	GPS	Mulakpur	A,V.P

CTC

33	Irtan Ullah	15101-9004463-3	GPS	Bakht Maira	GPS	Bakht Maira	A,V,P
34	Najib Ullah	15101-8368425-7	GPS	Shalizara(Chamla)	GPS	Shalizara(Chamla)	A,V,P
35	Mian Said Luqman	15101-5802199-3	GPS	Pir Abai	GPS	Pir Abai	A,V,P
36	Arze Muhammad	15101-0509776-9	GPS	Dab Serai	GPS	Dab Serai	A,V,P
37	Habib Un Nabi	15101-7546815-3	GPS	Dokada	GPS	Dokada	A,V,P
38	Ghafar Ali	15101-3694600-3	GPS	Kitawar	GPS	Kitawar	A,V,P
39	Zakir Ahmad	15602-1399445-1	GPS	Kila	GPS	Dandar	A,V,P
40	Nazir Zada	42401-1710209-9	GPS	Korya Dara(Chamla)	GPS	Korya Dara(Chamla)	A,V,P
41	Fayyaz	15101-9631247-3	GPS	Dewana Baba	GPS	Dewana Baba	A,V,P
42	Fazal Ghafoor	15101-6140240-9	GPS	Shudara	GPS	Shudara	A,V,P
43	Mufarriq Shah	15101-0843297-7	GPS	Choor Banda	GPS	Bazargay	A,V,P
44	Imdad Ullah	15101-9863005-1	GMPS	Ugda Khpa	GPS	Bar Gokand	A,V,P
45	Mohsin Khan	15101-1267683-5	GPS	Bazargay	GPS	Bazargay	A,V,P
46	Bakht Man Zeb	15101-5938703-5	GPS	Barjokanay	GPS	Barjokanay	A,V,P
47	Halim Ullah	15101-4092757-1	GPS	Nawagai(Girarai)	GPS	Nawagai(Girarai)	A,V,P
48	Sohail Aftab	15101-2097079-9	GPS	Buragat No.1	GPS	Buragat No.1	A,V,P
49	Naveed Khan	15101-2323940-1	GPS	Tangor	GPS	Inzarmaira No.2	A,V,P
50	Sher Zahid	15101-7037152-7	GPS	Gokan	GPS	Gokand	A,V,P
51	Said Qadar	15101-8935525-3	GPS	Daggar No.1	GPS	Daggar No.1	A,V,P
52	Sajjad Ahmad	15101-5694615-3	GPS	Kulyar Jabo	GPS	Kitawar	A,V,P
53	Nisar Ahmad	15102-0340683-3	GPS	Bar Teraj	GPS	Bar Teraj	A,V,P
54	Dianatullah	42401-6312022-9	GPS	Baimpur	GPS	Baimpur	A,V,P
55	Niaz Muhammad	15101-8593288-5	GPS	Bakar	GPS	Bakar	A,V,P
56	Muhammad Alam	42301-9255016-9	GPS	Koz Tiraj Sar	GPS	Koz Tiraj Sar	A,V,P
57	Muhammad Israr	15101-3434440-1	GPS	Maradu	GPS	Maradu	A,V,P
58	Sar Bali Khan	42301-0932117-7	GPS	Baikhanai	GPS	Baikhanai	A,V,P
59	Haider Ali	15101-3169377-7	GPS	Khawara	GPS	Khawara	A,V,P
60	Ayub Rahman	15101-1626600-3	GPS	Kalpani	GPS	Kalpani	A,V,P
61	Sher Umar	15101-0531884-9	GPS	Shalbandai No.1	GPS	Budal Maira	A,V,P
62	Faiz Muhammad	15101-9935990-1	GPS	Ladwan Kalpani	GPS	Ladwan Kalpani	A,V,P
63	Faiz Muhammad Khan	15101-1099367-3	GPS	Hassan Khel Cheena	GPS	Hassan Khel Cheena	A,V,P
64	Shahab Ali	15101-0338304-3	GPS	Ladwan Kalpani	GPS	Tawda Cheena	A,V,P
65	Islam Nabi	15101-8251151-3	GPS	Dokada	GPS	Dokada	A,V,P
66	Naik Amal Khan	15101-4257763-3	GPS	Toot Banr	GPS	Toot Banr	A,V,P
67	Hafiz Ullah	15101-4202771-3	GPS	Gadezi	GPS	Gadezi	A,V,P
68	Muhammad Khan	15101-6698580-7	GPS	Banda	GPS	Banda	A,V,P
69	Imraj Khan	15101-6418330-9	GPS	Karapa	GPS	Karapa	A,V,P
70	Mian Said Arshad	15101-7259572-1	GPS	Torwarsak No.2	GPS	Torwarsak No.2	A,V,P
71	Ibrahim	15101-8582203-3	GPS	Torwarsak No.1	GPS	Torwarsak No.1	A,V,P

CTC


 Advocate High Court

72							
73	Zalid Rashid	15101-1484632-9	GPS	Rega No.2	GPS	Rega No.2	A,V.P
74	Faisal Nawaz	15101-1582913-9	GPS	Gharib Abad	GPS	Nawagai No.1	A,V.P
75	Ijaz Ali	15102-0340255-5	GPS	Shalizara	GPS	Shalizara	A,V.P
76	Musa Khan	15101-0489077-5	GPS	Torwarsak No.1	GPS	Torwarsak No.1	A,V.P
77	Altaf Hussain	15101-6315619-3	GPS	Rago Khowa	GPS	Rago Khowa	A,V.P
78	Ikram Syed	15101-1288929-7	GPS	Rega No.2	GPS	Rega No.2	A,V.P
79	Anwar UI Haq	15101-4676677-9	GPS	Balo Khan	GPS	Balo Khan	A,V.P
80	Luqman Hakeem	15101-0983786-3	GPS	Miana Kowga	GPS	Chinglai	A,V.P
81	Qamar Ali Shah	15101-0867513-1	GPS	Anghapur No.1	GPS	Anghapur No.1	A,V.P
82	Ghulam Ali	15101-6880146-5	GPS	Kohay(Chamla)	GPS	Buragat No.2	A,V.P
83	Faqir Zada	15101-6075473-9	GPS	Hisar Tangay	GPS	Hisar Tangay	A,V.P
84	Murad Khan	15101-2035641-9	GPS	Gadezi	GPS	Gadezi	A,V.P
85	Sardar Ali	15101-0343535-3	GPS	Manai Bambalai	GPS	Manai Bambalai	A,V.P
86	Khursaid Ahmad	15101-8792615-7	GPS	Amnawar No.1	GPS	Gadezai	A,V.P
87	Gul Hamid	15101-4813181-9	GPS	Biamdara	GPS	Biamdara	A,V.P
88	Abid Ali	15101-8365063-7	GPS	Diwana Baba No.1	GPS	Diwana Baba No.1	A,V.P
89	Istikhar Gul	15104-0340608-1	GPS	Jica Agarai	GPS	Jica Agarai	A,V.P
90	Nasib Sher	15101-7904514-3	GPS	Hassan Khel Cheena	GPS	Cheena	A,V.P
91	Ibad Ullah	15101-7880580-9	GPS	Maizaray	GPS	Maizaray	A,V.P
92	Tahir Ahmad	15101-1473886-3	GPS	Malakpur	GPS	Malakpur	A,V.P
93	Sirzamin Khan	15102-0339938-9	GPS	Amnawar No.1	GPS	Ghazikhani	A,V.P

Terms and Conditions: -

1. They would be on probation for a period of one year, extendable for another one year.
2. They will be governed by such Rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their seniority in the cadre will be according to existing rules/policy.
6. No TA/DA will be allowed for joining their duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment made to them, in light of this order, will be recovered and if they are wrongly promoted they will be reversed.

(IFTIKHAR UL GHANI)
DISTRICT EDUCATION OFFICER
(MALE) BUNER

Endst; No. 145-51 /Estab; (M)Fry; Promotion of SPST

Dated. 9/01/2023.

Copy of the above is forwarded to the:-

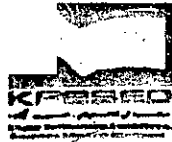
1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy commissioner Buner.
3. District Monitoring Officer Buner.
4. District Accounts Officer Buner.
5. All SDEO's Concerned Buner.
6. AP EMIS Local Office.
7. Officials concerned.

CTC
ASHRAF ALI
Buneri
Advocate High Court

9/1/23
DISTRICT EDUCATION OFFICER
(MALE) BUNER



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510468
EMAIL: edobuner@gmail.com



25

CORRIGENDUM.

In partial modification of this office order Endst: No.139-44 and 145-51 dated 09/01/2023, the following amendment is hereby made as noted in the best interest of public service.

S.No.	Name	May Be read as	Instead of	Remarks
1	Bakht Nawab SPST	GPS Shalbandai	GPS Budal	
2	Shahab Ali SPST	GPS Ladwan	GPS Tauda Cheena	
3	Jehan Zeb PSIT	GPS Yakhdera	GPS Karakar Jaba	Will be effective from 20/4/2023

Note:-

1.No TA/DA is allowed.

2.Charge report should be submitted to all concerned.

(OFFICIAL SEAL)
DISTRICT EDUCATION OFFICER
MALE BUNER.

Endst: No. 351-56
387

Dated 23/01 2023.

Copy forwarded for information and necessary action to:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy commissioner Buner.
3. District Monitoring Officer Buner.
4. District Accounts Officer Buner.
5. All SDEO's Concerned Buner.
6. Officials concerned.

CTC

ASHRAF ALI
Buner
Advocate High Court

DISTRICT EDUCATION OFFICER
MALE BUNER.

23/1/23

To,

The District Education Officer

Buner at sawari

26

Subject: Reply of show cause notice by Inayat Ullah SPST presently performing his duty as SPST at GPS Alagram Tehsil Chagharzi Distt Buner.

Preliminary Objections:

- 1) That the show cause notice issued by DEO (M) BUNER (Iftikhar UI Ghani) is base on mala fide and ill-well of DEO (M) Buner (Iftikhar UI Ghani) and has no effect on me.
- 2) That I Inayat Ullah was posed by education department as SPST at GPS Alagram against the transfer/posting and appointment Act-2011 and I performing my duty at GPS Alagram since 29-10-2019.
- 3) That as per policy and Act, the behavior of DEO (M) Buner (Iftikhar UI Ghani) is discriminatory because I was posed as SPST in GPS Alagram in violation of rules and the posts of SPST were vacant in UC Rega and adjacent UCs.
- 4) That my application for leave the concerned authorities were pleased to grant me 9 months & 20 days leave, and before expiry of leave I made application to DEO (M) Buner (Iftikhar UI Ghani) for transfer and adjustment to nearby schools lying vacant in UC Rega etc which was forwarded to the DEO (M) Buner (Iftikhar UI Ghani) through proper channel (copy attached).
- 5) That on 21-12-2023 I joined my duty in GPS Alagram and charge report was forwarded to concerned authorities copy attached.
- 6) That the behavior of DEO (M) Buner (Iftikhar UI Ghani) is discriminatory with me and DEO (M) Buner (Iftikhar UI Ghani) in violation of rules, regulation and Act issued an illegal order dated 17-02-2023 and adjusted me at GPS Gujjar Abad.
- 7) That the below impugned transfer/adjustment order was neither sent to me nor I was informed by DEO (M) Buner (Iftikhar UI Ghani) etc.
- 8) That the proper procedure was not adopted by DEO (M) Buner (Iftikhar UI Ghani) which indicate the ill-well of DEO (M) Buner (Iftikhar UI Ghani).
- 9) That on 17-02-2023 the impugned order was issued which was not even sent to me but on the next working day DEO (M) Buner (Iftikhar UI Ghani) visited GPS Gujjar Abad and a show cause notice was issued against me which further indicate the ill-well of DEO (M) Buner (Iftikhar UI Ghani).

The parawise reply of show cause notice is as below...

- 1) It is stated that concerned authority provided leave to me which was expired on 20-12-2022 and before expiry of my leave, I filed application for adjustment and transfer to near by schools laying vacant in UC Rega etc. as per transfer and posting Act-2011 on 07-12-2022 the SDEO (M) Chagharzi through proper channel and after expiry of my leave I assumed my duty at GPS Alagram on 21-12-2022 and charge report was maintained and has been sent to officials on 21-12-2022. So no violation was made by me. (Copy of application and charge report is attached as annexer A).
- 2) It is stated that I assumed my charge and duty in GPS Alagram and has already informed concerned authorities in this regard and was not informed by any one regarding illegal order of

CTC

AS/BAFALI
Buner
Advocate High Court

transfer/adjustment dated 17-12-2023 as the transfer/adjustment order was even not sent to me till now and para 2 of show cause notice is contradiction to para 1.

- 3) The para No.3 of show cause notice is incorrect hence denied as I have not pressurised the DEO (M) Buner (Iftikhar UI Ghani) but according to section 3 of transfer/posting and appointment act-2011 made application to DEO (M) Buner (Iftikhar UI Ghani) through proper channel which was neglected by the DEO (M) Buner (Iftikhar UI Ghani) without any legal cause but in violation of transfer/posting and appointment act-2011 I was illegally transferred to GPS Gujjar Abad which is situated in tehsil khudokhel and post of SPST is laying vacant in GPS Swari UC Rega as I belong to UC Rega, so mere allegations were made against me to pressurise me to follow the illegal order transfer/adjustment which is based on ill-will of DEO (M) Buner (Iftikhar UI Ghani).
- 4) That para No.4 of show cause notice is incorrect hence denied and I have not made any social media comments against DEO (M) Buner (Iftikhar UI Ghani) but DEO (M) Buner (Iftikhar UI Ghani) made baseless allegations against me which is violations & of law, regulations and fundamental right of me and I was tortured by sending the show cause notice and charging me allegations.
- 5) Para No.5 of the show cause notice is incorrect hence denied and I have made no unauthorized, baseless information through various comments on facebook regarding DEO (M) Buner (Iftikhar UI Ghani), but allegations were made against by this show cause notice.
- 6) That the para No.6 of the show cause notice is incorrect & denied and I have never creating embarrassing situation for the govt as well as E & S E department by propagating falsification and miss representation of facts and figures but serious allegations were made against me by the DEO (M) Buner (Iftikhar UI Ghani).
- 7) That the para No.7 of show cause notice is incorrect hence denied and I have committed no offence and I am honest and a professional teacher and performing my duty efficiently but the DEO (M) Buner (Iftikhar UI Ghani) have charged me with serious allegations without any proof and I was mentally tortured by the baseless allegations of DEO (M) Buner (Iftikhar UI Ghani).

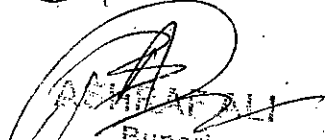
8/1) That I have committed no offence but mere allegations were made against me which is the violations of my fundamental rights and indicated the ill-will of DEO (M) Buner (Iftikhar UI Ghani), who has miss used his power and post which is also the violations of law & regulations.

8/2) That the show cause notice sent to me is the violation of law, rules and regulations as I have committed no mistake but DEO (M) Buner (Iftikhar UI Ghani) on one pretext or other trying to pressurize me through this illegal show cause notice.

8/3) I have committed no offence but an illegal show cause notice has been issued against me which is violation of law, rules & regulations as baseless allegations were made against me in the show cause notice.

8/4) That this show cause notice has been issued against me just to provide illegal cover to illegal order and a action of DEO (M) Buner (Iftikhar UI Ghani) as I have committed no offence and you have charged me with serious allegations without any proofs and I was mentally tortured due to your baseless and serious allegations & I have rights to file damages suit against you in the competent court of law.

So it is most humbly prayed that the show cause notice dated 20-02-2023 issued against me, may please be dropped in the best interest of justice and fairplay.

CTC

 Ahsan Ali
 Buner
 Advocate High Court

Court

Inayat Ullah

Inayat Ullah SPST

GPS Alagram Tehsil Chagharzi Distt Buner

26-02-2023

اصل درخواست دفتر میں جمع کیا
(مخمس)
27-2-23

CTC

Ashraf Ali
ASHRAF ALI
Buneri
Advocate High Court

29

To,

The Director Elementary & Secondary Education KPK
at Peshawar.

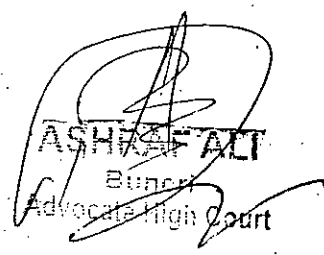
Sir,

Appeal against Impugned office order dated 17-02-2023 Endst: No.802-05 of DEO (M)
Buner/departmental appeal/representation.

Respectfully sheweth:

- 1) That petitioner has been performing his duty at GPS Alagram since 29-10-2019 which is situated in tehsil chagharzi UC Batara as appellant belong to UC Rega Tehsil Gagra but due to political influence appellant was posted/transferred to GPS Alagram in violation of Section 3 of transfer/posting Act-2011.
- 2) That appellant performing his duty efficiently in education department.
- 3) That the behavior of DEO (M) Buner is discriminatory with the appellant as the appellant has taken no mistake but due to political influence, appellant was transferred/adjusted to GPS Alagram in violation of transfer & posting Act-2011 as vacancies of SPST were lying vacant in UC Rega and adjacent UCsas well.
- 4) That appellant made application to concern authorities for leave and DEO (M) Buner was please to grant 9 months & 20 days E.O.L.
- 5) That before the expiry of aforementioned E.O.L appellant filed application dated 07-12-2022 to DEO (M) Buner for transfer/adjustment to the nearby school i-e GPS Swri UC Rega in which SPST post was lying vacant. (copy attached)
- 6) That the above mentioned application was forwarded by Head Teacher, ASDEO, SDEO through proper channel to DEO (M) Buner.
- 7) - That on 20-12-2022 the E.O.L of appellant was expired and appellant after intimation to concern authorities has assumed his duty at GPS Alagram on 21-12-2022 and the charge report was maintained and has been forwarded to concern authorities. (copy attached).
- 8) That the behavior of DEO (M) Buner is discriminatory with appellant and the above mentioned procedure which was adopted by appellant after expiry of appellant E.O.L were ignored by the DEO (M) Buner as I have submitted all the documents to the concern authorities/officers but DEO (M) Buner in violation of rules/regulations and transfer/posting Act-2011 issued an illegal order dated 17-02-2023 without any legal cause.
- 9) That the impugned transfer/adjustment order dated 17-02-2023 endst: No.802-05 is illegal and against the law procedure and have no effect on appellant.
- 10) That the impugned order dated 17-02-2023 was neither communicated to appellant nor sent to the appellant which further indicate the ill-well and discrimination of DEO (M) Buner with appellant.
- 11) The appellant has already taken his charge as SPST at GPS Alagram after expiry of E.O.L and in this regard application for transfer and charge report have already submitted to the concern authorities but DEO (M) Buner ignored all the documents and issued an illegal transfer order dated 17-02-2023 and after the said impugned transfer order on next working day i-e 20-02-

CTC


ASHRAF ALI
Buner
Advocate High Court

2023 visited GPS Gujjar Abad and afterward an illegal an illegal show cause notice was issued to the appellant which is enough to show his malafide with the appellant (copy attached).

- 12) The appellant has already submitted reply/para wise comments of the said show cause notice (copy attached).
- 13) That the impugned transfer/adjustment order 17-02-2023 and the show cause notice dated 20-02-2023 are illegal and null and void in the eyes of law.
- 14) That both the above mentioned transfer/adjustment order and show cause notice are liable to be cancelled in the best interest of justice and law.
- 15) That as per section-3 of transfer and posting act-2011 the appellant may please be transferred /adjusted to GPS Sawari UC Rega Tehsil Gagra.
- 16) That the post of SPST at GPS Sawari UC Rega is still vacant and appellant is deserving to be appointed/transferred to GPS Sawari UC Rega as soon as possible.

So it is most humbly prayed that the impugned transfer/adjustment order dated 17-02-2023 and show cause notice issued to the appellant on 20-02-2023 may please be cancelled and the appellant may please be transferred/adjusted to GPS Sawari UC Rega as per section 3 of transfer/posting act-2011 in the best interest of justice and fair play.

Inayat Ullah
 Inayat Ullah SPST
 GPS ALAGRAM
 Tehsil Chaghaezi Distt^r Buner
 28-02-2023

Copy forwarded to;

- 1) DEO (M) Buner
- 2) SDEO (M) Chagharzi Buner

CFC

Ashraf Ali
 ASHRAF ALI
 Buner
 Advocate High Court

Forwarded

Transfers Alert

AOA...!!!

All Heads of the Schools are directed to further inform Teachers to submit their transfer applications within Two days positively on list below.

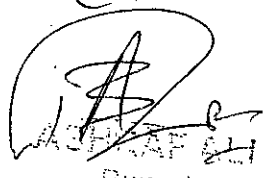
1. CNIC
2. Application for transfer (Duly signed by both Head of the Schools)
3. Last Order copy.
4. Vacancy Certificate
5. No. of teachers in school
6. No. of Students
7. EMIS Codes

Note 1. Incomplete file will be rejected.

Note 2. No teacher will be allowed to office during **school duty hours**, otherwise strict Disciplinary action will be initiated against him.

REGARDS

IFTIKHAR UL GHANI
DEO MALE BUNER.

CTC

 Duner
 Advocate High Court
 7:14 PM

محکمہ صحت - ڈی ای او سہیل - ضلع بونیر، مقام قصور

بوساطت ایس ڈی ای او سہیل (م) تحصیل حقوزی ضلع بونیر

عنوان: تبادلہ از جی پی ایس الیہ الگرام حقوزی تا جی پی ایس سواری تحصیل اترہ بونیر

جناب عالی

گزارش کی جاتی ہے کہ میں جی پی ایس الیہ الگرام حقوزی میں 29/10/2018 سے ڈپٹی سر ایس ڈی ایو رہا ہوں۔ چونکہ میرا تعلق بوسی اور گاؤں گتہ بند ہے اور سکول کا فائدہ ہمیشہ گھر سے تقریباً 28 کلومیٹر صحت ہے۔ اب قلمی تعلیم کے بارے میں صاحبین نے تبادلہ کر کے درج ذیل اسکول اور جی پی ایس سواری میں بھی بوسٹ بنائی ہے۔ شرف سفر اور صحت کے اعتبار سے جی پی ایس سواری میں تبادلہ کا بیاری حق رکھتا ہوں۔ لہذا اس کو پیشترہ میرا تبادلہ جی پی ایس الیہ الگرام سے جی پی ایس سواری کو کرنا چاہتا ہوں۔

عارضی طور پر
عنایت اللہ SPST

جی پی ایس الیہ الگرام میں طلباء کی تعداد 155 جبکہ اساتذہ کی تعداد 15 ہے۔
EMIS کوڈ 24007

جی پی ایس الیہ الگرام ضلع بونیر

تاریخ 14-03-2023

No objection transferred!

سرکار اعلیٰ حقوزی میں منتقل ہونے کی درخواست
مکمل طور پر منظور ہے۔
Shauq Ali Chaur
15/3/2023
Head Teacher
G.P.S Swar
Dist: Buner

Head Teacher
G.P.S Alagram Buner
14-3-2023

CTC

ASHRAF ALI
Buneri
Advocate High Court

مقامی / ملزم دفتر SPST حقوزی

Amac
15/3/23

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع بونیر بمقام سپاٹری

32-A

عنوان: درخواست برائے تبادلہ

جناب عالی!

سائیل حسب ذیل عرض ہے۔

① یہ کہ سائیل ۶۲۵ الہ گرام میں بحیثیت SPST اپنی ڈیوٹی سرانجام دے رہا ہے۔

② یہ کہ سائیل بونیر کونسل ریگولیشن کا گروہ کا مستقل رہائشی ہے اور تحصیل چغری میں اپنی ڈیوٹی بحیثیت SPST

اکتوبر ۲۰۱۹ سے سرانجام دے رہا ہے۔

③ یہ کہ سائیل نے ماقبل درخواست برائے تبادلہ / ایڈجسٹمنٹ بتاریخ 07-12-2022 اور 15-03-2023 کو

دفتر ڈی ای او صاحبہ جمع کئے تھے۔ (تقول لفظی)

④ یہ کہ سائیل کارپوریشن جی پی ایس الہ گرام سے ۲۵ کلومیٹر دور ہے اور آمدورفت میں شدید مشکلات کا سامنا ہے۔

⑤ یہ کہ جی پی ایس نمبر ۲ ریگولیشن سے مستثنیٰ ولی اللہ SPST جس کی مندرجہ ترقی بحیثیت بیکہار اردو ڈگری کالج ہوئی اور

موجودہ 25-04-2023 کو سکول مذکورہ سے رخصت ہوا۔ اور بونیر کونسل (ریگولیشن SPST پوسٹ خالی ہوا (تقول لفظی)

⑥ یہ کہ ٹرانسفر / پوسٹنگ ایکٹ ۲۰۱۱ کا تحت PST کی تبادلے و تقرریاں اپنے ہی بونیر کونسل میں ہوتی ہیں۔

تحت جی پی ایس ریگولیشن ۲ میں اب SPST کی سیٹ خالی ہوئی، لہذا آپ صاحبان مہربانی کر کے سائیل کا

تبادلہ جی پی ایس ریگولیشن ۲ کو کرادے تاکہ بطریق احسن ڈیوٹی ادا کر سکے۔ حقہ

العارض
محمد اسحاق

عنايت اللہ
SPST

جی پی ایس الہ گرام تحصیل چغری ضلع بونیر

27-04-2023

CTC

Ashraf Ali
Buner
Advocate High Court

32-B

RELIEVING SLIP

Consequent upon the appointment order issued by the Chief Secretary

Khyber Pakhtunkhwa vide Notification NO: NO.SO(C-II)/HED/11-

1/2022/URDU; dated 20th April 2023.

Mr Wali Ullah s/o Sakhi (SPST-14) is here by relieved from his


duties on 20-04-2023 after noon. He is directed to ensure his arrival


to GDC Daggar Buner.

Dated 20-04-2023

Head teacher

GPS No.2 Rega


Head Master
GPS Reg. No. 2
Dist: Buner


ASHRAF ALI
Buneri
Advocate High Court

(37)

رجسٹر حاضری مدرسین
جی پی ایس الہ گرام بونیئر بابت ماہ اپریل سال 2023

نام: عنایت اللہ
 عہدہ: SPST
 قومی شناختی کارڈ نمبر:

فون نمبر:		نام:		تاریخ:		موضوع:		موضوع:		موضوع:		موضوع:		موضوع:	
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تعمیرات علیہ الفجر از 21 مارچ 2023 تا 29 اپریل 2023

مدرسہ اسلامیہ، رینڈ، سندھ

1ms - استحقاق

اقوال

ASHRAF AET
 Buner
 Advocate High Court

رجسٹر حاضر کی مدد میں

گورنمنٹ ہائر سیکولر کالج بابت ماہ

سال 2023

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فون نمبر:				فون نمبر:			
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Advocate High Court

رہنما محضری اندرون سندھ گورنمنٹ ہیرا پوری سکول الہ گرام بابت ماہ جون سال ۲۰۲۱

۴: عنایت اللہ

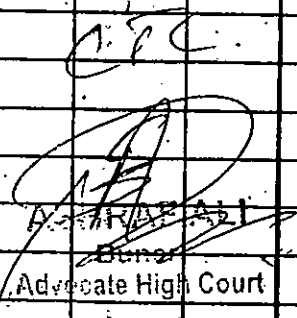
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قومی شناختی کارڈ نمبر:

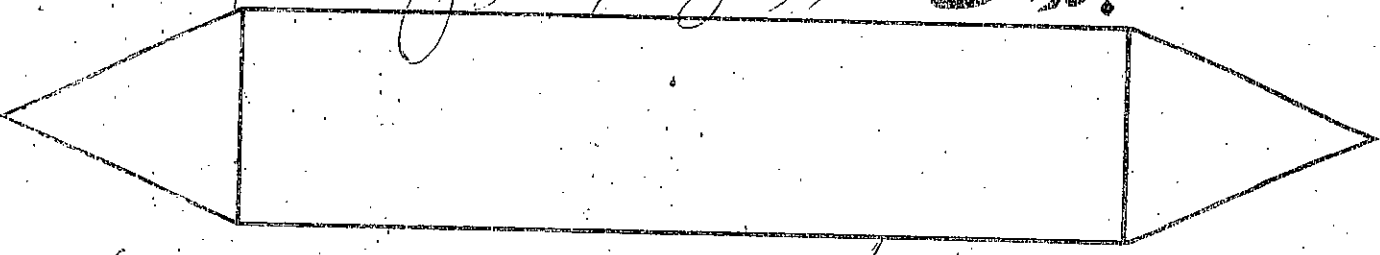
فون نمبر:

روز	تاریخ	مقرر	تاریخ	مقرر	روز	تاریخ	مقرر	تاریخ	مقرر	روز	تاریخ	مقرر
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SUNDAY


 Advocate
 Advocate High Court

بعدالت سرورسٹریٹس اور K.P.K ایٹ شہار



مقدمہ عنایت اللہ بنام ڈی. سی. ای. او بیٹل کونسل

دعویٰ سرورسٹریٹس اور ڈیفنس سیکشن ہاوس

نمبر 1974

تاریخ 3/06/2023 مورخہ 2023ء منجانب

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام سرورسٹریٹس اور ڈیفنس سیکشن ہاوس مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دیے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک نہ روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمد اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پداختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہے تو وکیل صاحب پابند نہ ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سنڈر ہے۔

المرقوم 03 ماہ جون 2023

العبد گواہ العبد

بمقام آشرف علی کے لئے منظور ہے۔

آشرف علی
Advocate
Buneri
Advocate High Court

آشرف علی
Buneri
Advocate High Court

عنایت اللہ
سرورسٹریٹس اور ڈیفنس سیکشن ہاوس



41 Annexure O



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER
PHONE & FAX NO. 0939-555110
EMAIL: edobuner@gmail.com

NOTIFICATION.

1. WHEREAS. Mr Inayatullah SPST GPS Alagram, under adjustment at GPS Gujjar Abad. was on extra ordinary leave 01/3/2022 to 20/12/2022 which was due to expire on 20/12/2022.
2. AND WHEREAS. after the expiry of his leave, he neither reported submitted his arrival to the office of the undersigned nor to the SDEO concerned for further adjustment.
3. AND WHEREAS. the SDEO Chagharzi vide his office letter No. 126 dated 13/02/2023 intimated this office regarding the expiry of his E.O L and requested his further adjustment.
4. AND WHEREAS. the DEO. as the Competent Authority, made an order of his adjustment at GPS Gujjar Abad vide this office Endst No. 802-95 dated 17/02/2023.
5. AND WHEREAS. he failed to comply with his adjustment order and did not take over charge of his duty at GPS Gujjar Abad and remained absent since then..
6. AND WHEREAS. the Competent Authority issued him show cause notice vide this office Endst No. 873-77 Dated 20/02/2023 under rule 7. dispensing with the inquiry for the reasons that the non-compliance, misconduct and absence had sufficient valid and reliable evidence and did not need any further inquiry.
7. AND WHEREAS. he submitted reply to the showcause notice which was perused by the Competent Authority. however. his reply to the show cause notice was unsatisfactory and devoid of valid reasons and defense on sound basis.
8. AND WHEREAS. the DEO. as the Competent Authority. called him for personal hearing vide this office Endst No. 1089 dated 03/03/2023.
9. AND WHEREAS. he appeared before Deputy DEO, as authorized by DEO to afford personal hearing for to him. where he recorded his answers to the questions in black and white on 20/03/2023.
10. AND WHEREAS. his reply to the questions during personal hearing was also found unsatisfactory.
11. AND WHEREAS. keeping in view allegations in the showcause notice. his reply to the allegation given therein followed by affording personal hearing on dated 10/03/2023. all allegations of absence misconduct and inefficiency have been proved.
12. NOW, THEREFORE. in exercise of the powers conferred under rule 4(b)(i) of the Khyber Pakhtunkhwa Govt Servants (Efficiency & Discipline) Rules 2011, as amended vide Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) No:SO(Policies)E&AD/2-6/2021 Peshawar Dated the 31/12/2021. I, Mr. Iftikhar Ul Ghani DEO(M) Buner as the Competent Authority, am pleased to impose major penalty of "Reduction to lower post and pay scale from SPST BPS 14 to PST BPS 12 for maximum period specified in rule 4(b)(i)" upon Mr. Inayatullah SPST GPS Gujjar Abad. The intervening period w.e.f 21/12/2022 to 31/05/2023 is treated as leave without pay.
In consequence of the above, since, as per sub section 3 of section 3 (proviso) of the Khyber Pakhtunkhwa (Appointment & Transfer of the Teachers, Lectures Instructors and Doctors Regulatory Act:2011. PST, BPS -12 is a Union Council based post. therefore, he is hereby adjusted at GPS Bishpur (U/C Rega, Tehsil Gagra) which is union council of his domicile.

Note: Necessary entry to this effect should be made in his Service Book accordingly.

Endst No. 2590-96 Dated 31/5 /2023.

(IFTIKHAR UL GHANI)
DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

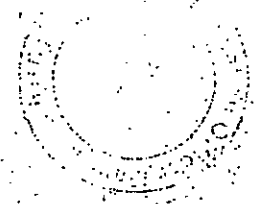
CTC
ASHRAF ALI
Buneri
Advocate High Court

Copy is forwarded for information to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
2. Deputy Commissioner Buner.
3. District Monitoring Officer Buner.
4. District Accounts Officer.
5. SDEOs(M) concerned.
6. Official concerned.
7. Master File.

DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

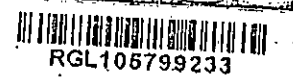
2590-96



To,

Omaya Ullah PST GPS
Beshpur UIC Raja Tehsil
Gagra
Vill: Takhta Band

20/06/2022



RGL105799233

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ASIRAFALI
Advocate High Court
Buneri

CTC

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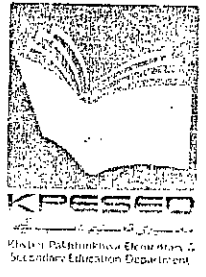
43

Annexure P

ABSENCE NOTICE



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER
PHONE & FAX NO. 0939-555110
EMAIL: edobuner@gmail.com



No. 346 Dated 26/6 /2023

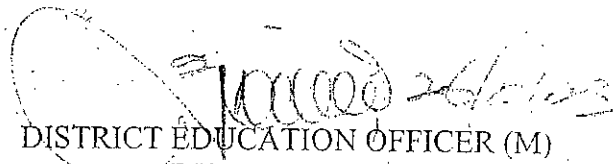
To

Mr. Inayatullah PST GPS Beshpur
Village Taklata Band Tehsil Gagra Buner.

Subject: - **ABSENCE FROM DUTY.**
Memo: -

In light of disciplinary proceedings against you under the Khyber Pakhtunkhwa Efficiency & Disciplinary rules 2011, you were penalized for Reduction to Lower Post and Pay Scale from SPST to PST and were adjusted at GPS Beshpur, but as reported by the SDEO (Male) Cagra Buner vide his office letter No.1157 dated 14-06-2023, you have still not taken over charge in the new duty station and have remained absent from school duty till date without any prior approval of the competent authority which is an act of sheer negligence and irregularity on your part.

You are therefore, directed to resume your duty within 15 days after the issuance of this letter, otherwise disciplinary action will be taken against you under (E & D) rules 2011, which may culminate in your removal from service.

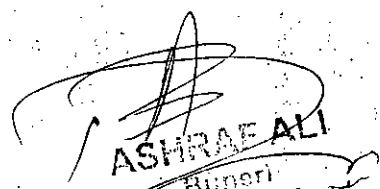

DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

Endst: No. _____ / dated. _____ /2023

Copy of the above is forwarded for information to: -
1. Sub-Divisional Education Officer(M) Gagra Buner

CTC


DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER


ASHRAF ALI
Buneri
Advocate High Court

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Annexure 9

The Director Elementary & Secondary Education KPK
at Peshawar

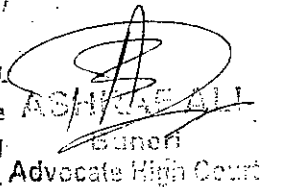
Sir,

Appeal against impugned Notification dated 31/5/23 Endst" 2590-96 DEO (M) Buner (the impugned notification was made after filing of appeal No.1270/23 and issuance notice to DEO (M) Buner but the date given is arbitrary)

Respectfully sheweth:

- 1) That appellant has been performing his duty at GPS Alagram since 29-10-²⁰¹⁹~~2023~~ which is situated in tehsil chagharzi UC Batara as appellant belong to UC Rega tehsil Gagra but due to political influence appellant was posted/transferred to GPS Alagram in violation of section 3 of transfer/posting Act 2011.
- 2) That appellant performing his duty efficiently in education department.
- 3) That the behavior of DEO (M) Buner is discriminatory with the appellant as the appellant has taken no mistake but due to political influence, appellant was transferred/adjusted to GPS Alagram in violation of transfer & posting Act 2011 as vacancies of SPST were lying vacant in UC Rega and adjacent UCs as well.
- 4) The appellant made application to concern authorities for leave and DEO (M) Buner was please to grant 9 months and 20 days E.O.L.
- 5) That before the expiry aforementioned E.O.L appellant filed application dated 07-12-2022 to DEO (M) Buner for transfer/adjustment to the nearby school i-e GPS Swari UC Rega in which SPST post was laying vacant. (copy attached)
- 6) That the above mentioned application was forwarded by the Head Teacher, ASDEO & SDEO through proper channel to DEO (M) Buner.
- 7) That on 20-12-2022 the E.O.L of appellant was expired and appellant after intimation to concern authorities has assumed his duty at GPS Alagram on 21-12-2022 and the charge report was maintained and has been forwarded to concern authorities. (copy attached)
- 8) That the behavior of DEO (M) Buner is discriminatory with appellant and the above mentioned procedure which was adopted by appellant after expiry of appellant E.O.L were ignored by the DEO (M) Buner as I have submitted all the documents to the concern authorities/officers but DEO (M) Buner in violation of rules/regulations and transfer/posting Act 2011 issued an illegal order dated 17-02-2023 without any legal cause.
- 9) That the impugned transfer/adjustment order dated 17-02-2023 endst; No.802-05 is illegal and against the law procedure and have no effect on appellant.
- 10) That the impugned order dated 17-02-2023 was neither communicated to appellant nor sent to the appellant which further indicate the ill-well and discrimination of DEO (M) Buner with appellant.
- 11) The appellant has already taken his charge as SPST at GPS Alagram after expiry of E.O.L and in this regard application for transfer and charge report have already submitted to the concern authorities but DEO (M) Buner ignored all the documents and issued an illegal transfer order dated 17-02-2023 and after the said impugned transfer order on next working day i-e 20-02-2023 visited GPS Gujjar Abad and afterward an illegal show cause notice was issued to the appellant which is enough to show his mala fide with the appellant (copy attached)
- 12) The appellant has already submitted reply/para wise comments of the said show cause notice (copy attached)
- 13) That the impugned transfer/adjustment order 17-02-2023 and the show cause notice dated 20-02-2023 are illegal and null and void in the eyes of law.

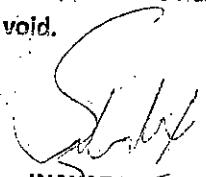
CTC

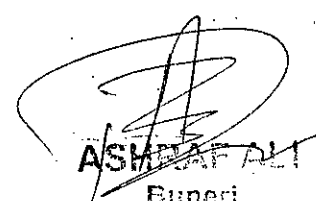

AS/HS/ALL
Buner
Advocate High Court

44-A

- 14) That after reply of show cause notice appellant was appeared before the Dy: DEO (M) Buner and appellant informed Dy: DEO (M) Buner that appellant has filed appeal before the director education against the illegal order dated 17-02-2023 and show cause notice 20-02-2023 and similarly appellant provided copies of departmental appeal, intimation later, charge report, reply of show cause notice and written answers to Dy: DEO (M) Buner but all the above mentioned documents and explanations was ignored by the DEO (M) Buner illegally which is violation of rules and regulations.
- 15) That appellant has already filed departmental appeal against the impugned order dated 17-02-2023 and 20-02-2023 so during pendency of departmental appeal and later on appeal before the Service Tribunal further proceeding are illegal and null and void in the eyes of law.
- 16) That the DEO (M) Buner in violation of transfer and posting act 2011 has made repeated illegal transfer order of appellant and appellant has filed appeal before the service tribunal which was admitted for regular hearing and notice was also issued to DEO (M) Buner but DEO (M) Buner after receiving notice from KP Service Tribunal in violation of rules and regulations issued the impugned notification No.2590-96 dated 31-05-2023 arbitrary and the impugned notification was issued after filing of appeal in Service Tribunal and receiving notice by DEO (M) Buner but the impugned notification was issued in back date as the impugned notification was sent to appellant through post office on 20-06-2023 and received by brother of appellant on 26-06-2023. (copy attached)
- 17) That the allegations made against appellant are baseless and were made to provide illegal cover to the illegal proceeding of DEO (M) Buner against appellant.
- 18) That during the pendency of appeal imposing major penalty is against law, rules and regulations and having no legal footing.
- 19) That even inquiry was not conducted against appellant but illegal penalty was imposed against appellant in haste.
- 20) That the impugned notification is illegal and is liable to be cancelled.

So it is most humbly prayed that the impugned notification No.2590-96 dated 31-10-2023 which was made during the pendency of appeal but has been issued in back date may please be canceled and declare null and void.


INAYAT ULLAH SPST (Appellant)
GPS Alagram
26-06-2023

CTC

ASIM AF ALI
Buneri
Advocate High Court

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Annexure R

45



GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE BUNER



Phone & Fax No. 0939-555110 Email: edd@meraj.gov.pk

NOTIFICATION.

The Competent Authority is pleased to order transfer in R/O the following officials to the schools noted against each in their own pay & scale in the best interest of public service with immediate effect.

S. No	NAME & DESIGNATION	CHIC	FROM	TO	Remarks
1.	MUHAMMAD HABIB SCT	15101-7936970-3	GHSS TORWARSAK EMIS Code 35935	GHSS GADEZI EMIS Code 35911	A.V.P
2.	QASIM IQBAL CT	15101-5151225-7	GHSS KHARARAI EMIS Code: 33957	GMS JICA AGARAI EMIS Code 36803	A.V.P
3.	NASIB ZADA Sr. Lab. Assit	15101-0330845-7	GHSS TORWARSAK EMIS Code 35935	GHSS BAMPOKHA EMIS Code 35903	A.V.P

Note:-

1. No TADA is allowed
2. Charge report should be submitted to all concerned.

(HAFIZ HANIF KHAN)
DISTRICT EDUCATION OFFICER
MALE BUNER

Endst.No. 2816-4 Dated: 10 / 6 / 2023

Copy is forwarded for information to the:-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer EMA at Buner
3. District Accounts Officer Buner at Daggan.
4. A.D (IT) EMIS Local Office, Buner
5. Principals /Incharges concerned.
6. Officials concerned.

CTC

[Signature]
10/6/23
DISTRICT EDUCATION OFFICER
MALE BUNER

[Signature]
ASHRAF ALI
Buneri
Advocate High Court

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[Faint, mostly illegible handwritten notes on lined paper, possibly including dates and names.]

C7C

ASH...
 Adv...

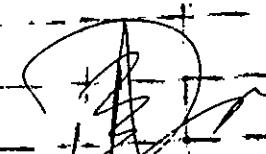
GPS Torwarsak

ایستادہ

بزنس نمبری بنائے شراف

M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	19
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	17
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	17
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	12
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	19
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	12
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	19
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	20
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	21
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	22
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	23
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	24
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	25
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	26
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	27
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	28
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	29
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	30
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	31
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	32
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	33
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	34
M. Ashraf Ali	1/35	M. Ashraf Ali	7/30	35

Handwritten signature/initials



ASHRAF ALI
Buneri
Advocate High Court

دفتروں کی تفصیل

1	2	3	4	5	6	7	8	9	10
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Announcement 5



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER
PHONE & FAX NO. 0939-555110
EMAIL: edobuner@gmail.com



NOTIFICATION.

WHEREAS the undersigned received complaint from the local community that Mr. Rahman Bahadar (PST) has been involved in illegal practice of performing dual duty/job of teaching in a private school during official school hours and frequently either remains absent or resorts to proxy.

AND WHEREAS the undersigned paid a surprise visit on 03-05-2023 at about 11:30 AM and found him absent from school duty. In spite of the facts that he had put his signature in the attendance register but was not physically present.

AND WHEREAS, reportedly, he is taking classes in Abhattabad International School and College, Chamar during official school timings ignoring his official duty and is guilty of misconduct, inefficiency and absence collaborated with utter violation of rules regulations and wastage of precious time of small kids.

NOW, THEREFORE, I Mr. Ifikhar Ul Ghani as the Competent Authority, am pleased to transfer Mr. Rahman Bahadar PST from GPS No. 2 Chamar to GPS Shpool on disciplinary grounds in the best interest of small kids and public service with immediate effect.

Note: Necessary entries to this effect shall be made in the Service Book accordingly.

No TADA is allowed.

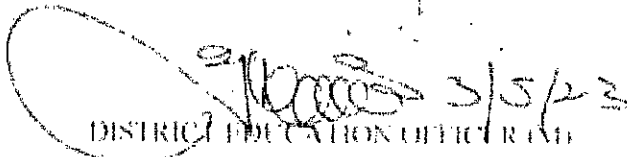
(IFTIKHAR UL GHANI)
DISTRICT EDUCATION OFFICER (M)
BUNER

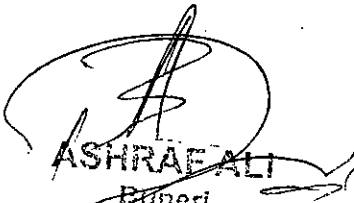
Endst: No. 2037-43; Dated: 3/5/2023.

Copy for information to: -

1. Director (E&Sf) Khyber Pakhtunkhwa Peshawar
2. District Monitoring Officer Buner.
3. Sub Divisional Education Officer (M) Gagra.
4. District Accounts Officer
5. Official Concerned.

CTC

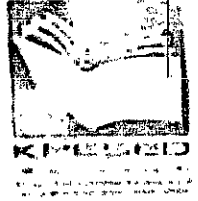

DISTRICT EDUCATION OFFICER (M)
BUNER


ASHRAF ALI
Buneri
Advocate High Court

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OFFICE OF THE DISTRICT EDUCATION OFFICER
C/MALL DISTRICT BUNER
PHONE & FAX NO. 0939-555119
E-MAIL: edobuner@gmail.com



OFFICE ORDER

The Competent Authority is pleased to cancel/withdraw transfer order issued vide this office endst. No.2039-43 dated 01/09/2021 in R/O Rahman Bahadar PST GPS Chanat No.2 to GPS Shyosol in the best interest of public service with immediate effect.

(OFFIKHAR UL GHANI)
DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

Endst.No 2503-061 dated 16/06/2023

Copy of the above is forwarded for information to:-

1. Deputy Commissioner Buner
2. District Monitoring Officer EMA at Buner.
3. SDEO(M) concerned.
4. Officials concerned.

CTC

DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

ASHRAF ALI
Buneri
Advocate High Court



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OFFICE OF THE SUB DIVISIONAL EDUCATION
(M) CHAGARZI DISTRICT BUNER

No. 1

Dated: 21/7/2022

To

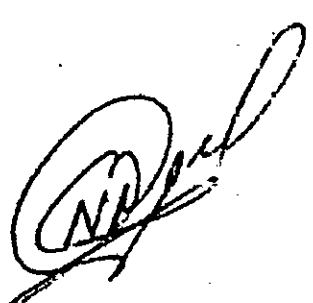
The District Education
Officer (M) Buner.

Subject: **REPORT REGARDING MR. MUSHTAQ AHMAD (SPST) GPS
MEHRAN DERAI**

Memo: -

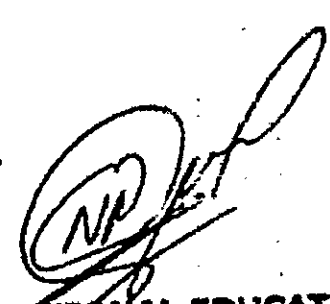
Reference to the subject, the undersigned hereby would like to state that concerned teacher is guilty of impersonation as per the verbal statement by the Head Teacher and the local community since the last four years. The official concerned has hired two teachers working on his place for certain remunerations. The official concerned has also been reported by EMA officials umpteen times but so far no action has been taken against him, except, deduction for that specific day. The act is sheer violation of the code of conduct and tantamount to crime. The act is not less the playing with the future of the poor souls.

The case is hereby forwarded for onward pragmatic measures.

for

SUB DIVISIONAL EDUCATION
OFFICE (M) CHAGARZI BUNER

Copy for info to:

1. District Monitoring Officer (M) Buner

for

SUB DIVISIONAL EDUCATION
OFFICE (M) CHAGARZI BUNER

CTC

ASHRAF ALI
Buneri
Advocate High Court