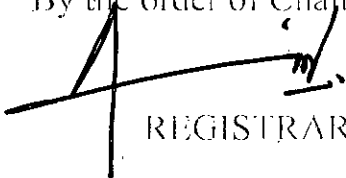


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2035/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	
1-	10/10/2023	<p>The appeal of Mr. Muhammad Idrees resubmitted today by Mr. Fayyaz Khan Chamkani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Muhammad Idrees son of Muhammad Irfan r/o House no. 166/A RA Bazar Peshawar Cantt received today i.e on 26.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the appellant.
 - 2- Check list is not attached with the appeal.
 - 3- Annexures of the appeal are not in sequence.
 - 4- Annexures of the appeal are unattested.
 - 5- Page nos. 5 and 18 to 23 of the appeal are illegible which may be replaced by legible better one.
- ⑥ One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3301 /S.T.

Dt. 27-9 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fayyaz Khan Chamkani Adv.
High Court at Peshawar

R/sid,

10.9.23

*in Case file is re-submitted after
necessary completion and compliance please.*



FAYYAZ KHAN
CHAMKANI

A.S.C.

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

Appeal no. 2035/2023

MUHAMMAD IDREES

VERSUS

Director E&SE & Others.

INDEX

S.NO	DESCRIPTION OF DECOMENTS	Annex	PAGE No.
1	Service Appeal & Affidavit		1-4
2	Copy of Advertisement	A	5
3	Application for appointment	B	6
4	Driving Test Call Letter	C	7
5	Revise list of candidates		8
6	Letter of conducting test	D	9-10
7	Meeting of Scrutiny Committee held on 24-02-2022	F	11-13
8	Appointment order	G	14
9	Medical Examination	H & I	15
10	Certificate of Transfer of Charge		16
11	Pay Release Letter		17
12	Daily attendance Register		18-25
13	Application for release of salary to DEO (F)		26
14	Notification of DEO dated 18-10-2022		27
15	Departmental Appeal		28
16	Miscellaneous Documents		29-31
17	Wakalat Nama		32

Dated: _____

Through _____

APPELLANT

FAYYAZ KHAN CHAMKANI
Advocate Supreme Court of Pakis

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Appeal no. 2035/2023

Muhammad Idrees S/o Muhammad Irfan

R/o House No.166/A, RA-Bazar Tariq Road, Peshawar Cantt

Appellant

VERSUS

- 1) Director Elementary and Secondary Education kp Peshawar
- 2) District Education officer Female Peshawar
- 3) Deputy District Education officer Female Peshawar
- 4) Sub-Divisional Education officer Female Peshawar

---Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 18/10/022 PASSED BY RESPONDENT NO 2, WHEREBY THE SERVICE OF THE APPELLANT WAS TERMINATED W.E.F. DATED 15/03/022 RECEIVED AND CONVEYED TO THE APPELLANT ON 05/05/023 AND BY NOT TAKING ACTION ON DEPARTMENTAL APPEAL WITH IN STATUTORY PERIOD OF NINETY DAYS.

Prayer:

On acceptance of this appeal the impugned termination order dated 18/10/022 may kindly be declare illegal, unlawful and the same be set aside in the interest of justice. Further more, the respondents be directed to reinstate the appellant with all back and consequential benefits.

Respectfully Sheweth,

- 1) That the respondent No. 1 advertised some posts of driver in daily "express" news paper on 15/10/021. (Copy is annexed---A)
- 2) That the appellant submitted application and the post of driver in the office of Respondent No-2 on 02/09/021 dairy no-2280. (Copy is annexed B)
- 3) That the Respondent no-3 issued letter no-2299 dated 11/11/021 in respect of driving test and directed the appellant to appear in the test on 16/11/021. In the office of SSP traffic Peshawar. (Copy is annexed C)
- 4) That subsequently the SSP Motor Licensing Authority Peshawar issued another letter no-140/MLA dated 07/12/021. (Copy is annexed D)

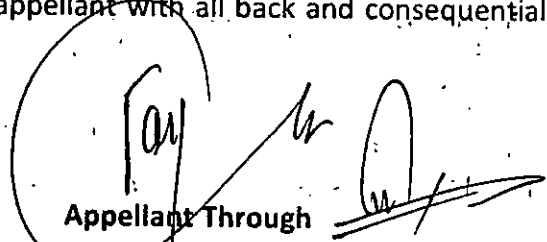
- 5) That the appellant appeared in the test on 14/12/021 in declared successful. (Copy of the letter along with list are annexed E)
- 6) That on 24/02/022 the district selection committee for the appointments of driver were conducted and the selection committee recommended the appellant for the said post. (Copy is annexed F)
- 7) That after the recommendation by the scrutiny committee the appellant was issued appointment order on 15/03/022. (Copy is annexed G)
- 8) That after issuance of appointment letter the appellant was medically examined by the medical superintendent civil hospital peshawar and took the charge with SDO female town-3 peshawar. (Copies is annexed-H and I)
- 9) That the respondent no-2 for the released of the salary issued letter to accountant general Khyber Pakhtunkhwa Peshawar. (Copy of the letter is annexed J)
- 10) That the appellant was performing their duties with the concerned official when all of a sudden the appellant was restrained from signing the daily attendance register and the salary was also stopped. (Copy of the attendance register is annexed K)
- 11) That the appellant for the releases of salary and allowing the appellant to make attendance in the register submitted so many applications but no positive response was received by the appellant. (Copies are annexed L)
- 12) That the appellant was performing their duties without salary till 05 May 2023 wherein the office informed the appellant that the appointment order of the appellant has been withdrawn on 18/10/022 in back dated. (Copy of the order is annexed M)
- 13) That the appellant being aggrieved from the order dated 18/10/022 received on 05/05/2023 filed departmental appeal on 01/06/023 which was not responded by the respondents within the stipulated period of ninety days. (Copy is annexed N)
- 14) That the appellant having no alternate remedy except to file the instant appeal before this honourable tribunal for redressal of his grievances on the following grounds amongst others

Grounds:

- 1) That the impugned order dated 18/10/022 passed by respondent no-2 is against the law facts and material on record hence liable to set aside.
- 2) That the order of termination of the appellant is not being passed according to the well established rules and procedure because the appellant were appointed after proper procedure adopted by the selection committee.

- 3) That no show cause notice are charged sheet were communicated to the appellat before passing the impugned order.
- 4) That the apex court has led down that proper opportunity of defence is to be provided strictly according to law and rules Appellant were terminated with utter disregard with the principles led down.
- 5) That the appellant was never associated nor informed by the respondents from their illegal action taken against the appellant passed the impugn order in violation of the mandatory provision of law.
- 6) That no final show cause notice was issued to the appellat before passing the impugned order of termination.
- 7) That no legal procedures was adopted by the respondents while passing the impugned order. Therefore, the order passed is illegal, unlawful void ab initio. Hence, liable to set aside.
- 8) That the proceeding adopted by the respondents while affording no opportunity of defense would amounts to condemned unheard and not treated as per law. Therefore, the impugned order have no value in the eye of law and is liable to set aside.

It is therefore, humbly prayed that on acceptance of this appeal the impugned order of termination of the appellat may kindly be declared be illegal, unlawful against the prevailing rules and principles of natural justice may kindly be set aside and the respondents be directed to reinstate the appellat with all back and consequential benefits also.


Appellant Through
Fayyaz Khan Chamkani
A.S.C

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2023

Muhammad IdressVs.....Director E&SE & others

AFFIDAVIT

I Muhammad Idrees S/o Muhammad Irfan R/o House No.166/A, RA-Bazar Tariq Road, Peshawar Cantt do here be solemnly affirm and declared on oath that the contents of the appeal are true and correct to the best of my knowledge and believe and nothing has been kept concealed from this honourable court.



DEPONENT

DAILY EXPRESS

روزنامہ اُردو اُکسپریس

پاکستان کے 11 شہروں سے ایک وقت شائع ہونے والا واحد اخبار

فلسطین نے اسرائیل کی حکومت کو دویا سٹے

یہ اقدام اسرائیل کی حکومت کے خلاف ہے۔ فلسطین نے اسرائیل کی حکومت کو دویا سٹے کی اطلاع دی ہے۔ فلسطین کی وزارت خارجہ نے اسرائیل کی حکومت کو دویا سٹے کی اطلاع دی ہے۔ فلسطین کی وزارت خارجہ نے اسرائیل کی حکومت کو دویا سٹے کی اطلاع دی ہے۔

عرب اسرائیل تعلق کم کرے

پرامن سفارت کاری کا ادارہ وسیع کرنا چاہتے ہیں، اسرائیل کے امارات، بحرین، مراکش، سوڈان، کوسوو سے تعلقات بڑھانے میں

اسٹیشن، گل ایب (جین نیوز، بیگز) کی طرف سے اسرائیل کے ساتھ تعلقات میں تبدیلی آئی ہے۔ اسرائیل نے امریکہ کے ساتھ تعلقات کو مضبوط بنانے کی کوشش کی ہے۔ اسرائیل نے امریکہ کے ساتھ تعلقات کو مضبوط بنانے کی کوشش کی ہے۔ اسرائیل نے امریکہ کے ساتھ تعلقات کو مضبوط بنانے کی کوشش کی ہے۔

آسامیاں خالی ہیں

اسٹیشن ایجوکیشن آفیسر (زناتہ) پٹوار کے زیر اہتمام مندرجہ ذیل آسامیوں کے لئے درخواستیں مطلوب ہیں جو کہ زیر تجزیہ ہو رہی ہیں۔ 30 ستمبر 2021 تک موصول ہو جانے چاہئیں۔ بعد میں موصول ہونے والی اور تامل در خواستیں قابل غور نہیں کی جائیں گی۔ صرف شارٹ لسٹ (Short Listed) امیدواروں کو نیٹ/انٹرویو کیلئے بلا یا جائے گا۔

نمبر شمار	نام آسامی	مجموعہ	تعداد آسامی	ذوی مسائل	اہلیت
01	ڈراما ٹیور	04	04	پٹوار	ذیل پاس اور LT/VI/HTV ایجوکیشن آفیسر 30 سے بعد کم از کم 5 سالوں کا تجربہ سرکاری یا نیم سرکاری اداروں میں اسٹاف کاروبار کو ترجیح دی جائے گی۔

ضروری ہدایات: درخواست کنندہ حضرات سادہ کاغذ پر درخواست نام زبردستی بند CV، تھمبی شدہ شناختی کارڈ، ذوی مسائل، تعلیمی سرٹیفکیٹ کی فوٹو کاپیاں ساتھ بھیجیں اور اپنا نوٹنمبر ضرور لکھیں۔ نیٹ/انٹرویو کے لئے اصل کاغذات ضرور ساتھ لائیں۔ سنیٹ/ایڈووکیٹس آفٹو آئے جانے کا کوئی لی ایسے نہیں دیا جائے گا اور نہ ہی قیام و طعام کی سہولت دی جائے گی۔ مزید معلومات کیلئے دفتر ہی اوقات کار میں دفتر بذاتہ سے رجوع کر سکتے ہیں۔

ایجنسز: پوسٹل ایجوکیشن آفیسر (زناتہ) پٹوار

INF(P)47492021 www.bepa.gov.pk

CAREER OPPORTUNITY

Pakistan Medical Commission invites applications from eligible candidates for consideration for the following positions. We will consider applications received up to the closing date.

Handwritten signature and notes at the bottom of the page.

Daily Express P 18-9-21

خدمت جناب کے سیکرٹری ایجوکیشن اور کونسلز
شاہراہ

مختوم سرائے مہرئی کراچی

جناب عالم

موردہ گزراش کے نام کراچی

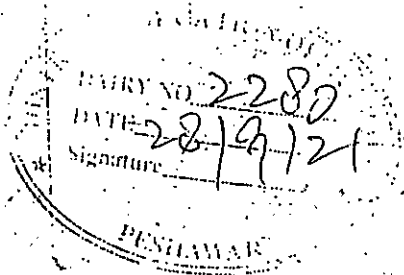
کے ایشیا راجہ میں آیا تھا جس کے لیے میں
درخواست گزراشوں کے آپ کسی ایک ہو سکتی
پر میں مہرئی کراچی

العارضین

محمد عظیم ولد محمد عرفان

Bazar RA

(B)



ANNEXTURE

ATTEST

Handwritten signature/initials



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email ED. emisfpeshawar@gmail.com

7

No. 2299 / Dated Peshawar the: 11-11 /2021

(C)

ANNEXTURE

To

Mr. Muhammad Idrees S/O Muhammad Urfan
House No. 166-A, R-A Bazar, Mohalla G.P.O
Peshawar Cantt

Subject: DRIVING TEST FOR THE POST OF DRIVER

Memo:

Reference you're application on the above noted subject, you are informed to appear in Driving Test on **16.11.2021** at **11:00AM** in the office of Senior Superintendent of Police (SSP) Traffic, Peshawar.

You are therefore, informed to appear on the said Driving test alongwith original CNIC, License & Domicile on the above mentioned date and venue.

By: District Education Officer
(Female) Peshawar

NOTIFIED
1/11/21



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpehavar@gmail.com

REVISE LIST OF THE CANDIDATES FOR DRIVING TEST

S.No	Candidate Name	Father Name	Remarks
01	Shehzad Khan	Muhammad Khan	Nasapa Bala, Khazana Sugar Mill, Charsadda Road, Peshawar
02	Abid Jamal	Bakht Jamal	Mohalla Bagheecha Sufaid Sung, Shagai Peshawar
03	Fazal Hassan	Raja Hassan	Hashmi Khel, Sher Kira, F.R Peshawar
04	Amir Sohail	Mumtaz Ahmed Siddiqui	Dalazakh Road, Mohalla Aneesa Abad, Yousaf Abad Peshawar
05	Muhammad Roman	Fazal Subhan	Kandi Hayat, Jhagra Peshawar
06	Syed Azhar Ali Shah	Syed Muhammad Zahir Shah	Palosi Atarzai Peshawar
07	Asif Khan	Muhammad Israr	Haryana Charsadda Road, Peshawar
08	Fazal Rehman	Shahib Shah Ali	Sadiq Abad, Chamkani Peshawar
09	Muhammad Idrees	Muhammad Urfan	CB-166 Peshawar Cantt
10	Muhammad Umair Tabassum	Ghulam Muhammad	Pajaggi Road PO Chowkyadgar H.No1119 St.No 13 Moh: Saeed Abad, Peshawar
11	Affan Ullah	Irfan Ullah	Moh: Yaseen Khel, Chamkani Peshawar
12	Rab Nawaz	Shahzada	Garhi Qamar Din, PO Technical College Moh: Shiekhhan Peshawar
13	Mudassir Maqsood	Maqsood Ahmad	Andron Gunj, Sakhi Pir Road, H.No 463 Moh: Esa Nala Band Peshawar.

Dy: District Education Officer
(Female) Peshawar

ATTESTED



To: The District Education Officer,
(Female) Peshawar.

No. 140 /MLA, dated Peshawar, the 7/12/2021.

Subject: - APPOINTMENT OF DRIVERS.

Memo:

Please refer to your office letter No. 3080/DSC File/Drivers, dated 29/11/2021 on the subject cited above.

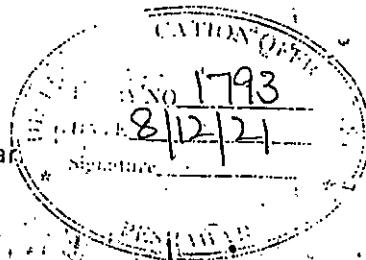
It is apprised that as requested by your good office, the driving test for the subject purpose will be conducted on 14/12/2021 at 12 pm. Direct the concerned candidates to appear for driving test at Traffic Police Headquarters Gulbahar Peshawar along with all their credentials on the aforementioned date and time. SI Arshullah No. 916/P shall conduct the said driving test. Please make sure that a representative from your office must also be present on the spot.

Deputy Superintendent of Police,
MOTOR LICENSING AUTHORITY,
PESHAWAR. 6/12/21

No. 141-47/MLA,

Copy of above is sent for information and necessary to the:-

1. Chief Traffic Officer, Peshawar w/r to his office Diary No. 3804, dated 30/11/2021, please.
2. SP Hqrs, City Traffic Police Peshawar
3. SP Cantt: City Traffic Police Peshawar.
4. SP City, City Traffic Police, Peshawar.
5. OASI & MTO, City Traffic Police, Peshawar.
6. Moharrar Traffic Lines, Peshawar.
7. SI Arshullah No. 916/P.



Deputy Superintendent of Police,
MOTOR LICENSING AUTHORITY,
PESHAWAR. 6/12/21

DA (P)
12
07-2211

(D)

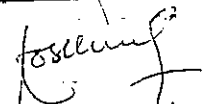
ANNEXTURE

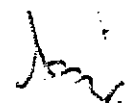
ATTACHED

Signature

Driving Test for Appoitment of Drivers in DEO (Female) Office Peshawar

S. No.	Name	Father Name	CNIC No.	D.License in possession	Contact No.	Practical Driving Test
1	Affan Ullah	Irfan Ullah	17301-5124498-9	M.Cycle+M.Car/Jeep Only	0314-7561717	Pass
2	Amir Sohail	Mumtaz Ahmad Siddiqui	17201-2068067-1	LTV	0314-9748130	Fail
3	Muhammad Idrees	Muhammad Irfan	17301-9939111-5	M.Cycle+M.Car/Jeep Only	0341-9777470	Pass

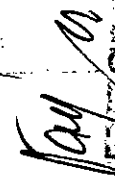

 SI Arshullah No. 916/P
 I/C Driving Test
 14/12/21


 Deputy Superintendent of Police
 Motor Licensing Authority
 Traffic Peshawar

14/12/21

(E)

ANNEXTURE


 ALL RIGHTS RESERVED

**MINUTES OF THE MEETING OF DISTRICT SELECTION COMMITTEE FOR THE APPOINTMENT OF DRIVERS,
IN THE OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.**

A meeting of *District Selection Committee* regarding recruitment of Drivers held on 24.02.2022 at 11.00 AM in the office of *District Education Officer, (Female)* Peshawar under the chairpersonship of *District Education Officer (Female) Peshawar*. Following officers attended the meeting:-

S.No	Name of Officer with designation	Capacity
01.	Ms. Samina Ghani District Education Officer (Female) Peshawar	Chairperson
02.	Mr. Muhammad Ishaq, Section Officer (Primary) Peshawar	Representative
03.	Ms. Nadia, Dy: District Education Officer (Female) Peshawar	Member
05.	Ms. Dr. Nosheen Saba ADEO (Female) Secondary, Local office	Member
06.	Ms. Ayesha Gohar ADEO (Female) Primary, Local office	Member
04.	Mr. Mumtaz Hassan, Superintendent, Local Office	Member

(F)
ANNEXURE B

The meeting was started with the recitation of the Holy Quran. The Chairperson welcomed the members and briefly discussed regarding recruitment of Drivers. Four (04) Numbers of Driver posts, are lying vacant in the offices of *Sub Divisional Education Office (Female) Town-I, II, III & IV Peshawar*.

: The above mentioned vacant were advertised through daily newspaper vide No. 427 dated. 28.09.2021 and about 150 applications were received to this office, among them thirteen (13) No's of applicants were short listed and were sent to the SSP Traffic vide letter No. 1976 dated. 03.11.2021 & 1260 dated. 21.01.2022 and after receiving result of successful candidates vide letter No-137 dated. 18.11.2021 & Letter No. 157 dated. 17.12.2021 and Letter No. 18 dated. 08.02.2022 from SSP Traffic.

The detail of Driver posts are given as under:-

Total Vacant Post of Drivers	-04-
Recommended Cases	-04-
Deferred Cases	-0-

ATTENDED
for
2

12

13

Open Quota / SHORT LISTED CANDIDATES:

No	NAME OF APPLICANT	FATHER NAME	D/o Birth of Candidate	Age up to 24.02.2022	APPLICANT C.N.I.C	DOMICILE	APPLIED FOR	DSC REMARKS
01	Shehzad Khan	Muhammad Khan	22.06.1988	33Y 8M 2D	17301-4232352-1	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
02	Abid Jamal	Bakht Jamal	16.04.1990	31Y 10M 3D	61101-7220808-3	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
03	Fazal Hassan	Raja Hassan	23.03.1994	27Y 11M 1D	17301-4203394-9	Peshawar	Driver	RECOMMENDED
04	Amir Sohail	Mumtaz Ahmad Siddiqui	10.11.1998	23Y 3M 14D	17201-2068067-1	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
05	Muhammad Roman	Fazal Subhan	12.02.1988	34Y 0M 12D	17301-2807697-3	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
06	Syed Azhar Ali Shah	Syed Muhammad Zahir Shah	01.01.1992	30Y 1M 23D	17301-4365181-3	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
07	Asif Khan	Muhammad Israr	01.01.1990	32Y 1M 23D	17301-7983241-7	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
08	Fazal Rehman	Sahib Shah Ali	01.02.1983	39Y 0M 33D	17301-4201559-3	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
09	Muhammad Idrees	Muhammad Urfan	01.01.1989	33Y 1M 23D	17301-9939111-5	Peshawar	Driver	RECOMMENDED
10	Muhammad Umair Tabassum	Ghulam Muhammad	04.10.1990	31Y 4M 20D	15402-6636523-7	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report
11	Affan Ullah	Irfan Ullah	01.01.1991	31Y 1M 23D	17301-5124498-9	Peshawar	Driver	RECOMMENDED


AT THE HEAD

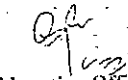
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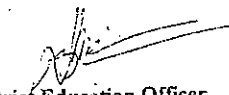
13	Mudassir Maqsood	Maqsood Ahmad	03.07.1980	41Y 7M 21D	17301-0152257-1	Peshawar	Driver	RECOMMENDED
	Ab Navaz	Shahzada	22.02.1989	33Y 0M 2D	17301-8922529-3	Peshawar	Driver	Failed in Driving Test, as per SSP Traffic Report


The meeting ends with a vote of thanks from chair.

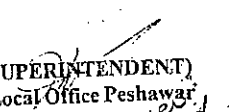
1. S.No. 3, 9, 11 and 13 are *Recommended*.
2. S.No. 1, 2, 4, 5, 6, 7, 8, 10 and 11 are *NOT Recommended* because they have failed driving test.
3. S.No. 10 is re-appeared for driving test as he was absent in the 1st driving test.
4. S.No. 10 filed case in Anti-Corruption for not taken driving test as he was absent due to which S.No. 10 has given a chance to reappear but he failed in driving test vide letter No. 198/MLA dated Peshawar: 08.02.2022 as per SSP traffic report.

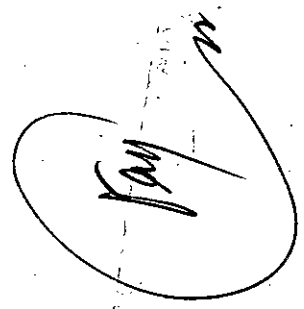

 (CHAIRPERSON)
 District Education Officer
 (Female) Peshawar


 Dy: District Education Officer
 Local office, Peshawar


 Assistant District Education Officer
 (F/S) DEO (F) Peshawar


 (REPRESENTATIVE)
 Section Officer
 (Primary) Peshawar


 (SUPERINTENDENT)
 Local Office Peshawar
 Assistant District Education Officer
 (F/P) DEO (F) Peshawar





14

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpehshavar@gmail.com**

APPOINTMENT ORDER:

Consequent upon the approval of the Departmental Selection Committee held on 24.02.2022, the competent authority is pleased to appoint Mr. Muhammad Idrees S/O Muhammad Irfan as Driver in the Office of Sub Divisional Education Officer (Female) Town-III Peshawar (CNIC: 17301-9939111-5) on regular basis in BPS-06 (Rs.10620-560-27420) plus usual allowances as admissible under the rules against the vacant post at the office mentioned against his name with effect from the date of his taking over charge on the following terms and conditions.

Terms and Conditions:

1. NO TA / DA is allowed.
2. Charge report should be submitted to all concerned.
3. His service is liable to termination on one months' notice from either side. In case of resignation without notice, one month pay/allowances shall be forfeited to the Government.
4. He will be governed by such rules and regulations as may be issued from time to time by the Government.
5. Health and age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
6. He should take over charge within 30 (Thirty) days from the date of issuance of this order.
7. His service will be liable to termination at any stage if their CNIC, Domicile or any other document he produced found fake, FIR will be lodged against him under the relevant law and recovery will be made of the paid salary.

Note:-

- His appointment order shall be verified by the Concerned DDO personally from this office before handing/ taking over charge.
- His CNIC & Domicile will be re-checked by the concerned DDO at the time of taking over charge.

(SAMINA GHANI)
District Education Officer,
(Female) Peshawar.

Endst No. 152022/F.No.D-1/ Appointment Drivers/2022/ Dated: 15 /03/2022.

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commissioner, Peshawar.
4. District Monitoring Officer (EMA) Peshawar.
5. Sub Divisional Education Officer (Female) Town- III, Peshawar.
6. P.A to D.E.O. (Female) Peshawar.
7. Official concerned.
8. Personal file.

SDEO (F)
Town III Peshawar

Dy: District Education Officer,
(Female) Peshawar

ATTENDED
[Signature]

MEDICAL CERTIFICATE

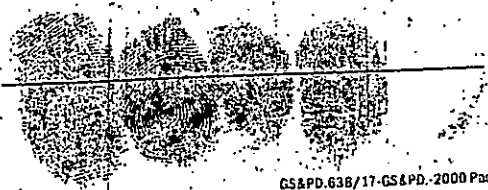
Name of official: Muhammael Adnis
 Caste or race: Muslim
 Father's name: Muhammael Adnan
 Residence: House # 166/A R.A Bazar Jamial Road Peshawar Cantt
 Date of birth: 23-03-1994
 Exact height by measurement: 5ft 10"
 Personal mark of identification: Nie
 Signature of the official: [Signature]
 Signature of head of office: _____
 Seal of office: _____

I do hereby certify that I have examined Mr. Muhammael Adnis, a candidate for employment in the Office of the District education office female and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nie

I do not consider this as disqualification for employment in the office of the As above. His age according to his own statement 28 year and by appearance about year Twenty Eight

[Signature]
 MEDICAL SUPERINTENDENT,
 CIVIL HOSPITAL
[Signature]
 16/03/22
[Signature]
 SDEO (F)
 Town III Peshawar

LEFT HAND THUMB AND FINGER IMPRESSIONS



ATTESTED
[Signature]

CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that we have on the fore/before Noon of this day respectively made over and receive charge of this office of the Mr. Muhammad Idrees, S/O Muhammad Irfan, Driver, BPS, 06.
2. Appointed in S.D.E.O (Female) Town-III, vide Order DEO(F) Peshawar vide Endst: No.4020-26/F.No.D-1/Appointment Drivers/2022 Dated 15-03-2022.

Signature of Relived Government Servant.....

Station Peshawar

Signature of Receiving Government Servant.....

Dated 16/03/2022

Endst. No. _____ Dated _____

Copy are forwarded to the:

1. Accountant General, KPK, Peshawar.
2. District Education Officer (Female) Peshawar.
3. Official, concerned.

S D E O (F) TOWN-III PESHAWAR

[Handwritten signature and stamp]



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpeshawar@gmail.com

17

PAY RELEASE:

The competent authority is pleased to release the pay of the following Drivers appointed vide this office Endst No. 4034-39, 4027-33, 4020-26 & 4040-45 dated Peshawar the: 15/03/2022, mentioned against each with effect from their date of taking over charge.

S. No	Name of Driver	CNIC No	Designation	Name of Office / SDEO Town
01	Affan Ullah S/O Irfan Ullah	17301-5124498-9	Driver	Sub Divisional Educational Officer (Female) Town-I, Peshawar
02.	Mudassir Maqsood S/O Maqsood Ahmad	17301-0152257-1	Driver	Sub Divisional Educational Officer (Female) Town-II, Peshawar
03	Muhammad Idrees S/O Muhammad Urfan	17301-9939111-5	Driver	Sub Divisional Educational Officer (Female) Town-III, Peshawar
04	Fazal Hassan S/O Raja Hassan	17301-4203394-9	Driver	Sub Divisional Educational Officer (Female) Town-IV, Peshawar

District Education Officer,
(Female) Peshawar.

(J)
ANNEXTURE

Endst No. 416-20 / Pay Release Drivers 2022 / Dated Peshawar the 04/04/2022.

Copy forwarded for information and necessary action to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Sub Divisional Education Officer (Female) Town-I, II, III & IV Peshawar w/r to their letter No.241 dated. 17.03.2022, 3014 dated. 31.03.2022, 34 dated. 045.04.2022, 125 dated. 04.04.2022.
3. Cashier local office.
4. Official concerned.
5. Personal file.

District Education Officer,
(Female) Peshawar.

Pay Release / Drivers

ANNEXTURE
Pay

Attendance Register of the August

for the month of 18-2022

(19)
Total
No. of
Days

Name	Father's Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Maclum Rana Gull			⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	
Maclum Abbas			⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	
Maclum																																	
Talves Abinoda			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
Mudasir Rainwa			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	

Subid
Subid

Sunday

Sunday

5

ATTESTED
Taj

ly Attendance Register of the September

for the month of 9-2-2022 (20)

Name	Father's Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days
Madam Ramea	Gull		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
Neelam	Abate		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
M. To. Idiaz	(Dewan)		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
Mudasis	Dy. Mewar		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		

ATTN
 REGISTERED
 [Signature]

Daily Attendance Register of the October 9 - 2012

for the month of _____ (21)

Serial No.	Name	Father's Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
	Madam Ramezall			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Neelam Akbar			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	M. idrees (Driver)			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Mudasi (Driver)			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P

Daily Attendance Register of the NOVEMBER - 2022

for the month of NOVEMBER - 2022

Name	Father's Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	
Madhu Rana	Cel		P	P	P	P	P	Sunday	P	P	P	P	P	P	Sunday	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	22	
Melamu	Abbas		P	P	P	P	P	Sunday	P	P	P	P	P	P	Sunday	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	22
M. Uday S			P	P	P	P	P		P	P		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	22	
Mudasi (Panwar)			P	P	P	P	P		P	P		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	22	

(Signature)

Daily Attendance Register of the December

for the month of 12-

Serial No.	Name	Father's Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total	Remarks
	M. Tadan	Rana Gopal		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
	Neelesh	Arora		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
	M. Idra			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
	Mudassar	(Dahiya)		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		

~~XXXXXXXXXX~~
 Jay

Attendance Register of the February 2023

for the month of 2/2023

(25)

Name	Father's Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remark	
in Raugh																																				
Islam Abbas			PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	Programs	PP	PP	PP	PP	PP	PP	Secretary	PP	PP	PP	PP	PP	Secretary	PP	PP							
Talib			PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP		
Basir (Dawood)			PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP		

(Signature)

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (زنانه) پشاور

درخواست برائے بحال کرنے ننخواستہ و جائزہ

(L) گانہ رجسٹرڈ

جناب عالی!

سائل حسب ذیل گزارش کرتا ہے۔

(1) یہ سائل نے حالیہ رجسٹرڈ میں جنوری 2023 تک رجسٹرڈ میں حالیہ گانہ بہ جید اسٹڈی کے سائل کو متعلقہ آفس نے حالیہ رجسٹرڈ میں حالیہ گانہ کے لئے نہیں منظور کیا جید سائل کو ننخواستہ مل گیا۔

(2) یہ سائل چونکہ فریب لگانے سے تعلق رکھتا ہے اور اپنے فراٹھن سے انجام دے رہا ہے لہذا سائل کو حالیہ رجسٹرڈ میں حالیہ گانہ اور سابق ننخواستہ بحال کرنے کو حکم صادر فرمائے۔

اعمالی

محمد ادریس
ڈسٹرکٹ آفیسر

(Signature)

27



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpeshawar@gmail.com

(M)

ANNEXTURE

NOTIFICATION:-

In pursuance of term No.7 of the appointment order No.4020-26 Dated Peshawar the 15.03.2022, appointment of Mr. Muhammad Idrees S/O Muhammad Irfan, Driver, Sub Divisional Education Officer (Female) Town-III Peshawar is hereby "Withdrawn with immediate effect" due to the reason mentioned below:-

"The Dealing Assistant D.E.O (Female) Peshawar has reported that during re-scrutinizing the appointment file of Drivers, the date of birth of Mr. Muhammad Idrees appointment vide order No. 4020-26 dated Peshawar the 15.03.2022 is incorporated mistakenly in the meeting minutes".

(SAMINA GHANI)
District Education Officer,
(Female) Peshawar.

Endst: No. 5954-10 / Driver File/ Dated Peshawar the: 18/03/2022

Copy of the above is forwarded to the: -

- 1- Director (E&SE) Khyber Pakhtunkhwa Peshawar
- 2- PS to Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
- 3- Accountant General Khyber Pakhtunkhwa Peshawar.
- 4- District Monitoring Officer Peshawar.
- 5- SDEO (Female) Town-III Peshawar with the remarks to recover any over payment made to the above named Official and deposit in to Govt Treasury under intimation to this office and also stop his pay with immediate effect.
- 6- Assistant Programmer, local office.
- 7- Mr Muhammad Idrees, Driver, SDEO (Female) Town-III Peshawar

Samina
18/10/2022
District Education Officer,
(Female) Peshawar

ATTACHED
[Signature]

بخدمت جناب ڈائریکٹر ایلیمینٹری اینڈ سکینڈری ایجوکیشن خیبر پختونخواہ پشاور۔

عنوان: درخواست برآمد بحالی ملازمت (N)

جناب عالی!

ANNEXURE

گزارش ہے کہ سائل بحیثیت ڈرائیور ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) کے ماتحت سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹاؤن 3 کے آفس میں بمورخہ 15-03-2022 کو بھرتی ہوا تھا۔

جناب عالی ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) پشاور کی طرف سے ڈرائیوروں کی بھرتی کے لئے مورخہ 15-03-2022 کو روزنامہ آج میں اشتہار شائع ہوا تھا۔ جس کے لئے سائل نے بھی اپنی درخواست جمع کروادی۔ بعد میں مورخہ 11-11-2021 کو بذریعہ لیٹر نمبر 2299 کہا گیا کہ ہم SSP ٹریفک پولیس کے پاس جا کر اپنا ڈرائیونگ ٹسٹ دیں۔ جو کہ سائل نے تحریری اور ڈرائیونگ ٹسٹ باقی امیدواران کے ساتھ دیا اور پاس کیا۔ ٹسٹ میں پاس ہونے کے بعد مورخہ 15-03-2022 کو سائل کے ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) کی جانب سے سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹاؤن 3 میں بطور ڈرائیور بھرتی کیا گیا۔ سائل نے اپنی ڈیوٹی پوری ایمانداری، محنت اور لگن سے سرانجام دی۔ سائل کو آخری تنخواہ جنوری 2023ء کو ملی اس کے بعد چند نامعلوم وجوہات کی بناء پر تنخواہ بند کر دی گئی اور حاضری رجسٹر میں حاضری لگانے سے بھی منع کر دیا گیا۔ اس دوران سائل نے متعدد بار زبانی اور تحریری طور پر درخواست دی کہ سائل کی تنخواہ جاری کرنے کے احکامات کیے جائیں اور ساتھ ہی اسے حاضری رجسٹر میں حاضری لگانے کی بھی اجازت دی جائے۔ اس کے باوجود بھی سائل کی اس سلسلے میں کوئی شنوائی نہ ہوئی اور سائل اپنی ڈیوٹی پر آتا رہا۔ مورخہ 05 مئی 2023ء کو دفتر ہذا کی جانب سے اسے نوکری سے برخاستگی کا آرڈر موصول ہوا۔

جناب عالی! سائل کا تعلق ایک شریف، معزز مگر غریب گھرانے سے ہے۔ مہنگائی کے اس دور میں اور مستقل روزگار نہ ہونے کی وجہ سے بیوی بچوں کی کفالت کرنا انتہائی دشوار ہے۔ سائل ایک تعلیم یافتہ، تجربہ کار اور، ڈرائیونگ لائسنس کے ساتھ تمام تردد کار دستاویزات سے مزین ہے۔ جو کہ درخواست کے ساتھ لفب ہیں۔

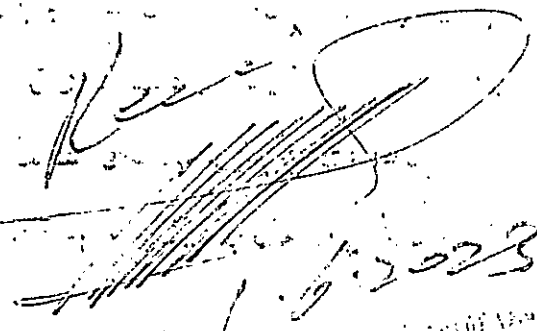
جناب عالی میری یہ استدعا ہے کہ ڈسٹرکٹ ایجوکیشن آفیسر کو میری بحالی ملازمت کے لئے احکامات صادر فرمائے جائیں۔ سائل اور اس کے گھروالے آپ کی اس کرم نوازی کے لئے تادم دعا گورہیں گے۔

العارض

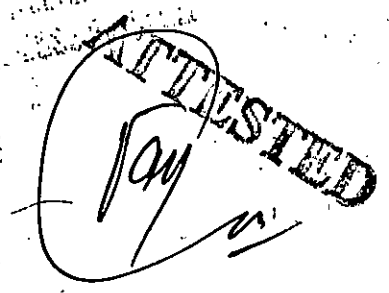


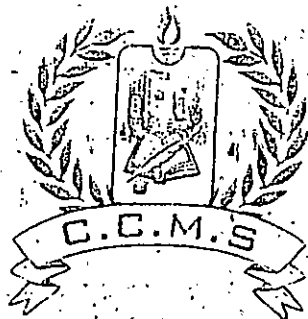
محمد ازیمن (سابقہ ڈرائیور)

ایس ڈی ای او فیملی ٹاؤن 3 پشاور



16/3/2023





City Challenger Model School

Main Dalazak Road Near Rasheed CNG Peshawar

Phone: 0333-9044155

To whom it may concern

This is certify that Mr. Muhammad Idris S/O Muhammad Irfan N.I.C 17301-9939111-5 has worked as a Driver in our School from September 2016 to November 2021. During his stay in this school his conduct remains good.

We wish him for success on his future life.

[Handwritten Signature]
3/10

Principal/-
City Challenger Model School

ATTESTED
[Handwritten Signature]

KHYBER PAKHTUNKHWA
Transport & Mass Transit Department
DRIVER'S LICENSE

Peshawar

LTV
10020008360

MUHAMMAD IDRIS
MUHAMMAD IRFAN

DOB: 23 Mar 1904
CNIC: 17301-9839111-5
GENDER: Male
ISSUED: 02.03.2022
EXPIRES: 01.03.2027

Issuing Authority

31






سٹی ٹریفک پولیس پشاور
CITY TRAFFIC POLICE PESHAWAR
DRIVING LICENSE لائسنس



17301-9839111-5

Name	MUHAMMAD IDRIS	محمد ادریس
Gender	MALE	مرد
Date of Birth	23-03-1994	23 مارچ 1994
License No.	100000206490	لائسنس نمبر
Issue Date	08-12-2015	8 دسمبر 2015
Expiry Date	13-12-2026	13 دسمبر 2026

ATTACHED
Pay

50 روپے	11201	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈریس:	بار کونسل ایسوسی ایشن نمبر: bc 107214	  
	رابطہ نمبر: 03005876994	

بجالات جناب: جیہ سن جیہ جتوں فورہ سرورس ٹریڈ لیم

مخاطب: <u>رسیدہ</u>	دعویٰ: <u>رسیدہ</u>
<u>افغان کاروبار ڈارلس</u>	علت نمبر:
<u>بنام</u>	مورخہ:
<u>ڈائریکٹر ایجوکیشن و سٹری</u>	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام کے لیے ضابطہ حاصل کیا ہے۔ اس کے ساتھ ساتھ گورنمنٹ کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا کٹرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ سے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ برادارہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، ابتدا و کالت نامہ لکھ دیا تاکہ سند سے

PESHAWAR

المرقوم: 1/20

باعت تحریر آگہ

مقام: Accepted

[Signature]