


FORM OF ORDER SHEET

Court of _____

Appeal No. _____ **2036/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/10/2023	<p>The appeal of Mr. Affan Ullah 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</p> <p> REGISTRAR</p>

The appeal of Mr. Affan ullah son of Irfan Ullah r/o village and post office Chamkani mohallah Yaseen Khei Peshawar 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. 3300 /S.T,

Dt. 27-9/2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fayyaz Khan Chamkani Adv.
High Court at Peshawar

R/SW,

10.9.2023

The case file is re-submitted after necessary completion and compliance please.

Fayyaz

Fayyaz Khan Chamkani
A.S.C.

BEFORE THE COURT KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal no. 2036/2023

AFFAN ULLAH

VERSUS

Director E&SE & Others.

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Dated: _____

Through

APPELLANT

Fayyaz Khan Chamkani
FAYYAZ KHAN CHAMKANI

Advocate Supreme Court of Pakistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

①

Date: Appeal no 20367/2023

Affan ullah s/o Irfan ullah R/o village and p/o chamkani mohallah

Yaseen khel tehsil and district Peshawar.....

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)

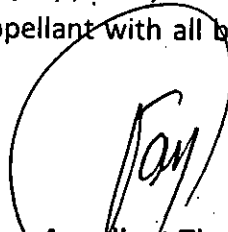
- 5) That the appellant appeared in the test on 14/12/021 in declared successful. (Copy of the letter along with list are annexed E)
- 6) That on 24/02/022 the district selection committee for the appointments of driver were conducted and the selection committee recommended the appellant for the said 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 appellant 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 appellant 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 appellant 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 appellant 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

Affan Ullah.....Vs.....Director E&SE & others

AFFIDAVIT

I Mr. Affan Ullah Son of Irfan Ullah, Ex-Driver, village & P.O Chamkani, Tehsil & District Peshawar, 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



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

فلسطین نے اسرائیل کی حکومت کے لیے دویا ہاؤس

بیت المقدس کو دار الحکومت بنانے کی کوششوں کی مذمت، فلسطین کی پارلیمنٹ

بیت المقدس کو دار الحکومت بنانے کی کوششوں کی مذمت، فلسطین کی پارلیمنٹ نے اسرائیل کی حکومت کے لیے دویا ہاؤس بنانے کی کوششوں کی مذمت کی ہے۔

عرب اسرائیل کے تعلقاً کم کر

پرامن سفارت کاری کا ادارہ وسیع کرنا چاہتے ہیں، اسرائیل کے امارات، بحرین، مراکش، سوڈان، کویت سے تعلقات برقرار رکھنے میں

دانشمن، اس ایب (نیٹ نیٹو، انٹرنیٹ) کی طرف سے اسرائیل سے تعلقات برقرار رکھنے میں مددگار بننے کی کوششوں کی اطلاع دی گئی ہے۔

آسامیاں خالی ہیں

ڈانرنگ ایجوکیشن آفیسر (زبان) پشاور کے زیر اہتمام مندرجہ ذیل آسامیوں کے لئے درخواستیں مطلوب ہیں جو کہ زیر ترقی و پوری 30 ستمبر 2021 تک منسول ہو جانی چاہئیں۔

Table with 5 columns: No. of Posts, Name of Post, Qualification, Age Limit, and Other Details. Includes details for Urdu and English posts.

شہری رہائیاں: درخواست دہندگان کو پشاور کے ذریعہ درخواست نام زد شدہ تعلیمی بھرتی CV، تہذیبی شہرہ نشانی کا کارڈ، ڈو میٹریکس، تعلیمی سرٹیفکیٹ کی کاپیاں ساتھ بھیجیں اور اپنا نوٹس نمبر ضرور لکھیں۔

Our Faith Corruption Free Pakistan

CAREER OPPORTUNITY

Pakistan Medical Commission invites applications from eligible candidates for appointment on the following position contract basis prefer on merit.

لبنان، اٹلی اور ترکی سیاحوں کے لئے سفر پر کاروبار کی دعوت (اے ٹی وی) لبنانی ٹی وی نے آرمی میں امانت کے پیش نظر سیاحوں کو سیاحوں کے لئے سفر پر کاروبار کی دعوت دی ہے۔

تجدید و عرب امارات: 50 فیصد سے زائد رہائشی امراض قلب میں مبتلا رہنے والے افراد کو 50 فیصد سے زائد رعایتی شرحوں پر قرضے فراہم کرنے کی پیشکش کی جا رہی ہے۔

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حضور جناب ڈائریکٹر ایجوکیشن آفیسر صاحبہ
زبانہ مدراس 76

جناب عالیہ

دفعہ 3

ANNEXTURE

گنہگار ہے کہ سال ڈیوٹیوں کے
سے پہلے چلے کہ آئیڈیل سائبر سائبر
ڈرائیور خالی میں جن میں سے ایک کنبہ سائبر
خدمات پیش کرنا چاہتا ہے۔

سائبر لٹا بورڈ سے حکم اچھے طریقوں سے کہا ہے
سائبر لٹا بورڈ کے جوان ہے اور شریف خاندان سے
تعلق رکھتا ہے

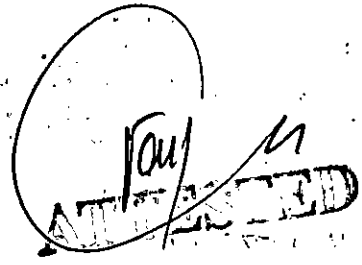
منیجمنٹ کے اس دور میں سائبر لٹا بورڈ کے
لٹا آف سائبر سے استرعا ہے کہ کسی ایک
ڈرائیور کی پوسٹ پر ہوتی ہے کہ سائبر لٹا بورڈ
ہیں

الطاف

Afzal
ایک ماہر ارشدان احمد ولد عثمان احمد
کنہ مکنی کی اور

24/10
30/7/21

03147561717





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

7

No. 230 / Dated Peshawar the: 11-11 /2021

To

Mr. Affan Ullah S/O Irfan Ullah
Mohalla Yasceen Khel, Shiekhan, Chamkani, Peshawar

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.

ANNEXTURE

Dy: District Education Officer
(Female) Peshawar

Tay



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

8

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	Sahib 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.No 1119 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: Shickhan 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



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

No. 157 /MLA, dated Peshawar, the 17/12/2021.

Subject: - APPOINTMENT OF DRIVER.

Memo:

Please refer to your office letter No. 3080/DSC File/Drivers, dated 29/11/2021 and this office letter No. 140/MLA, dated 07/12/2021 on the subject cited above.

It is to intimate that, result of candidates appeared in driving test held on 14/12/2021 for the subject purpose is enclosed herewith for further necessary action at your end, please.

[Signature]
Deputy Superintendent of Police,
MOTOR LICENSING AUTHORITY,
PESHAWAR.

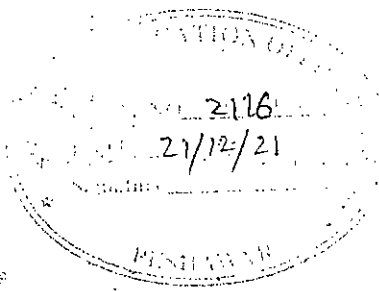
15/12/2021

No. 158 /MLA,

Copy of above is sent for information to the Chief Traffic Officer, Peshawar w/r to his office Diary No. 3804, dated 30/11/2021 and this office memo: No. 141-47/MLA, dated 07/12/2021, please.

[Signature]
Deputy Superintendent of Police,
MOTOR LICENSING AUTHORITY,
PESHAWAR.

15/12/2021



DA
17/12/21

[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

10

ANNUAL LICENSING

Deputy Superintendent of Police
Motor Licencing Authority
Traffic Peshawar

14/12/21

SI Arshullah No. 916/P
I/C Driving Test

14/12/21

Pass

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

ANNEXTURE

Four

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-

12

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 3M 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	61101-7220808-5	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 Sliah	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


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APPLICANT


13

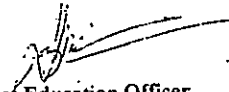
	Shahzada	22.02.1989	33Y 0M 2D	17301-8922529-3	Peshawar	Driver	Failed in Driving Test as per SSP Traffic Report
13	Mudassir Maqsood	03.07.1980	41Y 7M 21D	17301-0152257-1	Peshawar	Driver	RECOMMENDED


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 12 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. 98/MLA dated Peshawar. 08.02.2022 as per SSP traffic report.

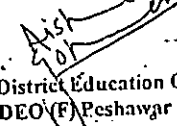

 (CHAIRPERSON)
 District Education Officer
 (Female) Peshawar

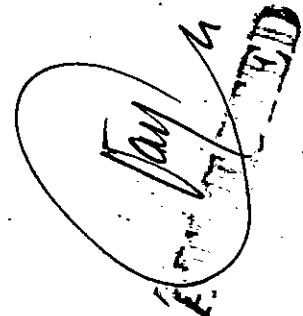

 Dy: District Education Officer
 Local office, Peshawar


 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





APPOINTMENT ORDER:

Consequent upon the approval of the Departmental Selection Committee held on 24.02.2022, the competent authority is pleased to appoint Mr. Affan Ullah S/O Irfan Ullah as Driver in the Office of Sub Divisional Education Officer (Female) Town-I Peshawar (CNIC: 17301-5124498-9) 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: 4034-29/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- I, Peshawar.
6. P.A to D.E.O (Female) Peshawar.
7. Official concerned.
8. Personal file.

Dy: District Education Officer,

MEDICAL CERTIFICATE

15

Name of official AFGAN ULLAH
 Caste or race AFGHAN
 Father's name IRFAN ULLAH
 Residence MOHALLAH VASSEN KHEL CHAMKANI PESHAWAR
 Date of birth 10-11-1998
 Exact height by measurement 5 FEET 9 inch
 Personal mark of identification NIL
 Signature of the official [Signature]
 Signature of head of office _____

H3

Seal of office S.D.C.O (F) Peshawar

I do hereby certify that I have examined Mr. AFGAN ULLAH a candidate for employment in the Office of the EDUCATION OFFICE PESHAWAR and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except USE OF GLASSES

I do not consider this as disqualification for employment in the office of the AS ABOVE
 His age according to his own statement 23 year and by appearance about 23 year.

VA 6/6
6/9
e glasses
Haw

MEDICAL SUPERINTENDENT,
 CIVIL HOSPITAL _____
 Medical Superintendent
 Police/Services Hospital

16/10/2002

LEFT HAND THUMB AND FINGER IMPRESSIONS



[Signature]

ASSUMPTION OF CHARGE

Certified that I have on the fore/afternoon of this day receive charge of office of the Sub Divisional Educational Officer (Female) Town-I, Peshawar vide District Education Office (Female) Peshawar Endst: No. 4034-39 dated Peshawar the 15/03/2022 against vacant post of Driver (BPS-06).


Station SDEO (F) Town-I, Peshawar.

AFFAN ULLAH

Government Servant: Har

Designation: Driver (BPS-06)


Dated: 16/3 /2022

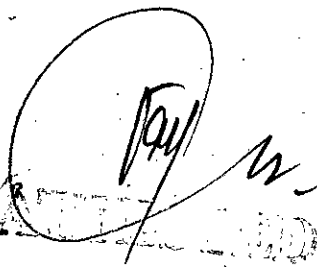

Sub Divisional Educational Officer
(Female) Town-I, Peshawar.

Endst: No 234 / Dated Peshawar the 17-03- /2022.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Female) Peshawar.
3. PA to Director of (E&SE) Khyber Pakhtunkhwa, Peshawar.
4. Official concerned.
5. Personal File.


S.D.E.O (F)
Town-I Peshawar
Sub Divisional Educational Officer
(Female) Town-I, Peshawar.



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

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.

"J"

ANNEXTURE

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.

Endst No. 416-20 / Pay Release Drivers 2022/Dated Peshawar the 6/04/2022.

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. 04.04.2022 & 125 dated. 04.04.2022.
3. Cashier, local office.
4. Official concerned.
5. Personal file.

A.P.
District Education Officer,
(Female) Peshawar

Pay Release / Drivers

Pay
PAID

"K"
ANNEXTURE

18

Daily Attendance Register of the DEO(F) Peshawar

for the month of September 2022

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 No. of Days
							X																												
	Salman Rauf						X																												
	AFFAN ULCAHI			A	A	A	X	A	A	A	A	A	A	X	A	A	A	A	A	X	A	A	A	A	A	A	A	A	A	A	A	A	A	A	

(Signature)

19

الشمس

Daily Attendance Register of the OCTOBER DECK

for the month of _____

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
	ساجد المصطفى	N/B	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	X	P		
	المصطفى	N/B		X		P	P	P	P	P	X	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P			
	علي المصطفى		A	X	A	A	A	A	A	A	X	A	A	A	A	X	A	A	A	A	A	A	X	A	A	A	A	A	A	X	A			

Handwritten signature and initials in a circle.

Daily Attendance Register of the DBO (A) Pesh

for the month of نوفمبر 22

Name	Father's Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12
عمران احمد	بنيا سين	M/B							P	P	P	P	P	P
سعد احمد	سعد احمد													
اسد افتخار		S/C												
عفا كمال			A	A	A	A	A	X	A	A	A	A	A	A

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
P	P	P	P	P	P	P	(P)	P	P	P	P	P	P	P	P	P	P			

(Signature)

Attendance Register of the _____

for the month of December 2012

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	Remarks		
عزیز احمد		P	P	X	P	P	P	P	P	P	X	P		P	P	P	P	P	P	P	P	P	P	P												
نبی حسین		P	P	X	P	P	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
سعید اللہ		P	P	X	P	P	P	P	P	P	X	P		P	P	P	X	P	P	P	P	P	P													
سید امجد	H/O	P	P	X	P	P	P	P	P	P	X	P		P	P	P	X	P	P	P	P	P	P													
mdad Ali Shah												P		P	P	P	X	P	P	P	P	P	P													
L Haseeb								P	P	P	X	P		P	P	P	X	P	P	P	P	P	P													
M ULLAH		P	P	X	P	P	P	P	P	P	X	P		P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		

(Handwritten signature/initials)

Daily Attendance Register of the DEO (P) Pathankot

for the month of January

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	Total No. of Days
49				X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	
50			N/B	X	P	P	P	P	P	P	X	P	P	P			X							X						
51			N/B	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	
52				X	P	P	P	P	P	P	X	P	P	P	P	P	X							X						
53			J/c	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	
54				X	A	A	A	A	A	A	X	A	A	A	A	A	X	A	A	A	A	A	A	X	A	A	A	A	A	

(Signature)

محرمین جناب ڈسٹرکٹ ایجوکیشن افسسر (زبانہ) پشاور

۴
۵

درخواست لہرائے بحال کرنے کی خواہش حاضری لگانے کے دراصل

ANNEXTURE
ANNEXTURE

جناب عالی! مسائل حسب ذیل گزارش کرتا ہے۔

۱۔ تاہم کہ مسائل نے حاضری (بشر میں جنوری 2023 تک) میں حاضری لگانے کی وجہ سے اس کے بعد مسائل کو متعلقہ افسر حاضری افسر پر حاضری لگانے کیلئے نہیں جوڑا ہے۔ جبکہ مسائل کی تنخواہ بھی نہیں ہے۔

۲۔ یہ کہ مسائل جو کہ عمریں گھرانے سے تعلق رکھتا ہے۔ اور اپنے خالق سرانجام دے رہا ہے۔ لہذا مسائل کو حاضری (بشر میں حاضری لگانے اور سابقہ تنخواہیں بحال کرنے کا بھی حکم صادر فرمائے۔

العمرین
عفا عن اللہ ولد عمر ما اللہ
ڈرائیور

ATTESTED



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

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M 3

ANNEXTURE

NOTIFICATION:-

In pursuance of term No.7 of the appointment order No.4034-39 Dated Peshawar the 15.03.2022, appointment of Mr. Affan Ullah S/O Irfan Ullah, Driver, Sub Divisional Education Officer (Female) Town-I 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. Affan Ullah appointment vide order No. 4034-39 dated Peshawar the 15.03.2022 is incorporated mistakenly in the meeting minutes & there is ambiguity in his experience certificate / Driving license is also after due date".

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

Adst: No. 5911-17 / Driver File/ Dated Peshawar the: 18/10/2022

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-I 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. Affan Ullah, Driver, SDEO (Female) Town-I Peshawar.

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

بخدمت جناب ڈائریکٹر ایلیمنٹری اینڈ سکینڈری ایجوکیشن خیبر پختونخواہ پشاور۔

عنوان: درخواست بمراد بحالی ملازمت

جناب عالی!

ANNEXURE No
TURB

گزارش ہے کہ سائل بحیثیت ڈرائیور ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) کے ماتحت سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹاؤن 1 کے آفس میں

مورخہ 15-03-2022 کو بھرتی ہوا تھا۔

۱۱/۱۱/۲۰۲۱

جناب عالی ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) پشاور کی طرف سے ڈرائیوروں کی بھرتی کے لئے مورخہ 18-09-2021 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 چٹھی نمبر 2301 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 1 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

برخواستگی کا آرڈر موصول ہوا۔

جناب عالی! سائل کا تعلق ایک شریف، معزز مگر غریب گھرانے سے ہے۔ مہنگائی کے اس دور میں بیوی بچوں کو ساتھ ہے۔ سائل نے پشاور ماڈل ڈگری کالج

سے ایف ایس سی (FSC) امتیازی نمبروں سے پاس کیا ہے۔ سائل کے پاس تجربہ، ڈرائیونگ لائسنس اور باقی تمام دستاویزات پوری ہے۔ جو کہ

درخواست کے ساتھ لف ہیں۔

جناب عالی میری یہ استدعا ہے کہ ڈسٹرکٹ ایجوکیشن آفیسر کو میری بحالی اور واجبات کے ادا کرنے کے احکامات صادر فرمائیں۔ سائل اور اس کے گھر والے

آپ کی اس کرم نوازی کے لئے تادم دعا گورہیں گے۔

العارض

عفان اللہ (سابقہ ڈرائیور)

ایس ڈی ای او فیمیل ٹاؤن 1 پشاور

1.6.2023

Assistant Director (Admin)
Directorate E&SE Peshawar

Pay



PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN



Name
Aifan Ullah

26



Father Name
Irfan Ullah

عرفان اہل

عرفان اہل



Gender : Country of Stay
M : Pakistan

Identity Number : Date of Birth
17301-5124493-9 : 10.11.1993

Date of Issue : Date of Expiry
08.09.2021 : 03.09.2031

Holder's Signature

Fayyaz
AIFAN ULLAH

1025591095705



17301-512-198-9

الجمهورية الجزائرية الديمقراطية الشعبية

الجمهورية الجزائرية الديمقراطية الشعبية

الجمهورية الجزائرية الديمقراطية الشعبية

الجمهورية الجزائرية الديمقراطية الشعبية





سیٹی ٹریفک پولیس پشاور
CITY TRAFFIC POLICE PESHAWAR
DRIVING LICENCE ڈرائیونگ لائسنس



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1719151240989

Licensing Authority

Name	AFFAN ULLAH
Gender	MALE
Date of Birth	10-11-1998
License No.	100000343110
Issue Date	08-10-2021
Expiry Date	07-10-2026

Present Add: MOH. YASIN KHEL, SHEIKHAN, CHAMKANI PESHAWAR
Permanent Add: MOH. YASIN KHEL, SHEIKHAN, CHAMKANI PESHAWAR



Emergency# 03495456107
Blood Group: O(+ve)
 M CYCLE M.CAR/JEEP LTV



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2. If found please drop to the nearest letter box.
www.steps.gov.pk #Mobile App

Affan

27

ایکس۔ایو۔آر۔12

ایمپلوائمنٹ ایکسچینج کارڈ
 جن امیدواروں کے پاس تجارتی کارڈ (X) موجود نہ ہو۔
 ان کو دفتر روزگار کا نامزد کردہ تصدیق کیا جائے۔

O.P.S.S.

SERVICE
UNPAID

رجسٹریشن نمبر: 2559/NT/2021
 نام: عفتان الکر ولدیت حضرت عرفان الکر
 پتہ: 18/بائیں سید، دیہہ پشاور

بخدمت جناب منیجر صاحب

دفتر روزگار

شخصی کارڈ نمبر: 117301-9-24499-9

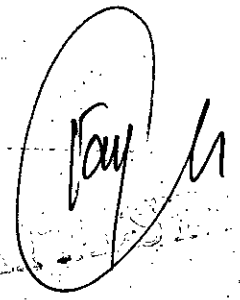
1.1 OCT 2021

Manager
 Employment Exchange
 Peshawar

10/3/2022

ضروری اطلاع برائے امیدوار

جب آپ کو ملازمت مل جائے تو فوراً منسلک جوابی کارڈ پر دفتر روزگار
 کو اطلاع کریں۔ اس کارڈ پر ڈاک کا ٹیکہ لگانے کی ضرورت نہیں۔



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جوابی حصہ

رجسٹریشن نمبر 7559/17/1 تاریخ 11 OCT 2021

نام عرفان اللہ 3-99-16

انٹرنیشنل کمانڈر

مجھے بتاؤ

(تاریخ منہ ملازم رکھنے والے کا نام و پتہ)

لازمہ مل گیا ہے۔

تاریخ

دستخط

امیر واروں کے لئے ہدایات

- 1- عدم تجدیدی صورت میں آپ کا رجسٹریشن منسوخ سمجھا جائیگا۔
- 2- جب کبھی بھی آپ دفتر روزنامہ میں نیچر سے ملازمت کے سلسلہ میں ملاقات کے لئے آئیں تو کارڈ ہذا ضرور ہمراہ لائیں۔
- 3- جملہ خط و کتابت میں رجسٹریشن نمبر اور انٹرنیشنل کمانڈر کا حوالہ ضرور دیں۔

چال ٹپیں	جگہ برائے تیسویں امیر واروں

ATTACHED

WAHDAT

ABC Certified, Member APNS, CPNE, FEC
First Complete Pushto National Daily of Pakistan

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Ref: _____

Date: 01/10/2021

To Whom it May Concern




This Certify that the Mr. AFFAN ULLAH S/O IRFAN ULLAH CNIC 17301-5124498-9 is very competent and energetic Driver of DAILY WAHDAT PESHAWAR. His Duty experience Period from Nov-2016 to Oct 2021. He is also Competent energetic and Very determined. He can truly exceed most expectation.

Syed Haroon Shah
Publisher/Chief Editor
Daily Wahdat Peshawar

PESHAWAR

Head Office (Peshawar) - 3-A, Nizamabad Road, Peshawar, Pakistan
Karachi Office - Room No. 11/1st Floor, Minico Centre, Chamber Road, Saddar, Karachi-74000
Islamabad Office - 3rd Floor, Room No. 3, Minico Centre, Chamber Road, Saddar, Islamabad

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قیمت 50 روپے	3916	پشاور بار ایسوسی ایشن، خیبر پختونخوا
ایڈویکیٹ:	بار کونسل ایسوسی ایشن نمبر: bc.107214	  
	رابطہ نمبر: 03005876994	

بعدالت جناب: جید من سروسز، جی این ایف، جی این ایف، جی این ایف

منجانب: <u>ایس ایف</u>	دعویٰ: <u>سروسز ایف</u>
<u>کھان ایف</u>	علت نمبر:
بنام	مورخہ:
<u>محمد سعید احمد کونسل ریسرچ</u>	جرم:
	تھانہ:

بابت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
آن مقام پر کیلے مندرجہ نامہ کی پیروی کی جائے گی۔ دعا کیلئے مندرجہ نامہ

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم 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، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 1/20

بند گواہ شد الع
مقام: Attended & Accepted کے لیے منظور ہے۔

(Handwritten signatures and marks)