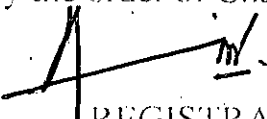


FORM OF ORDER SHEET

Court of _____

Appeal No. 2056 2056 / 2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/10/2023	<p>The appeal of Mr. Tajir Khan presented today by Mr. Nasir uddin Yousafzai 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>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR**

Service Appeal No:- 2056 /2023

Mst: Tajir Khan (PSHT TEACHER)

Versus

District

Education Officer (M) Jamrud Khyber

others

..... Appellant

..... Respondents

INDEX

DATED 13/10/2023

S#	Description of the Documents	Annex	Pages
1.	<i>Grounds of Service Appeal</i>	*	1-10
2.	<i>Affidavit</i>	*	11
3.	<i>Copy of appointment letter</i>	"A"	12
4.	<i>Copy of promotion order in pay scale 15</i>	"B"	13-15
5.	<i>Copy of leave application</i>	"C"	16
6.	<i>Copy of removal order dated 03/07/2023</i>	"D"	17
7.	<i>Copy of written reply</i>	E & F	18 & 19
8.	<i>Copy of representation to Director Education</i>	H	20
9.	<i>Copy of teachers attendance Register</i>	I	21
10.	<i>Copy of letter dated 19/05/2023</i>	J	22
11.	<i>Copies are annexed of explanation, show cause and charge sheet as K, M, O and N respectively</i>	K, M, O, N	23-25 26-A
12.	<i>Medical reports & tests</i>	*	26-31
13.	<i>Copies of CNIC and form B</i>	*	32-33
14.	<i>Service Book</i>	*	34-40
15.	<i>Re-deployment order dated 10/02/22</i>	*	41
16.	<i>Cancellation of re-deployment order dated 10/05/22</i>	*	42
17.	<i>Salary slip May 2023 of appellant</i>	*	43
18.	<i>Addresses of respondents</i>	*	44
19.	<i>Wakalat Nama</i>	*	45

Rahn
Appellant:

Through:-

Nasiruddin Youaf zai
Nasiruddin Youaf zai

Advocate High Court Peshawar.

Respectfully Sheweth:-

1. That the appellant was appointed as PTC (Male) Teacher in the year, 2006 in pay scale 9 (i.e 11392-96/khy-l.kl dated 26/07/2006) since then he was performing his duties with full devotion and honesty and he rendered 15 years services to the department and his track record was outstanding, unblemished and not a single adverse word was reported in the service book record. (Copy of appointment letter Annexed as annexure "A").
2. That the appellant was promoted in pay scale 14 in the year 2018 letter issued by DEO Khyber.
3. That the appellant on basis of his excellent performance was promoted to BPS-15 scale as per order of District Education Office Khyber Jamurd vide order dated 3815-22/PSHT/Promotion dated 24/05/2021. (Copy of promotion order dated 24/05/201 annexed as annexure "B").
4. That the appellant has improved his education qualifications during Service got degree of B.ed in 2014 and Master in Islamiyat in 2020.
5. That the appellant being the only medical attendant submitted an application leave an account of his mother very serious illness (i.e paralyzes) to the respondent No 1, which was pending un-responded and should be intimated to the appellant whether leave was granted or rejected. The status of leave application never conveyed to the appellant.

A

Medical reports and her tests are attached with it. (Copy of application is annexed as annexure "C").

6. That the appellant performed his duty in a very critical and tense situation, because the school of the appellant is situated in hard and badly affected terrorism area of District Khyber, moreover, he was the only teacher in the said school without any other colleagues and Chowkidar in 2006 performed his duty during this period.
7. That the respondent No 1 did not consider his leave application for which he is entitled for it and without fulfill codel formalities passed the impugned removal order from service dated 03/07/2023. (Copy of removal order is attached as annexure "D").
8. That without conducting proper inquiry, the appellant has been removed from services, vide order dated 03/07/2023 and respondents have never published in any daily leading newspaper of my unauthorized absence from the duty. The appellant submitted written reply to DEO Khyber dated 20/06/2023 and 31/05/2023 respectively but respondent No. 1 have not considered his version while passing the harsh impugned order dated 03/07/2023 against the appellant. (Copies of written reply are annexed as "a E and F")
9. That the appellant filed departmental appeal against the said order passed by the respondent No. 1 but the status of appeal was still unknown to the appellant, the reason best known to the respondents.

~

10. That because the enquiry officer has not been served any notice sent to his home mail address before him for recording his statement in connection of his absence nor he contact the appellant in this regard.
11. That appellant has submitted leave application and not received any letter from the concerned authority that the respondents put the leave application in cool storage. In case the concerned authority reported, the leave application was not accepted than appellant would rush to resume the duties at once to discharge the duty immediately in the public interest and left his ill mother on the mercy of Allah but such decline letter of leave application never received by the appellant. (Medical reports/tests copies are annexed as page No. to)
12. That the appellant copy of CNICs and Form Bare annexed on Page No. to).
13. That the appellant requested for copy inquiry report but the respondents denied to hand over to the petitioner.
14. That it is a unique case in the history of Education Department in KPK that without informing in writing, the appellant leave application was accepted/rejected started enquiry against the appellant to remove from the service.
15. That against the said impugned removal order dated 03/7/2023 the appellant submitted representation to respondent No 4 through appeal to Director Education Khyber Phuktoon Khwa for restoration in service on 07/07/2023. but till now no order has been passed by the

respondent No 4. (Copy of representation is attached as annexure "H").

16. That the appellant record reveals from the service book that in his whole service tenure he has not granted any leave to him except one month leave granted without pay for Tabligh
17. That the appellant is very poor man, having a wife, two sons, four daughters one unmarried sister ill old mother and father living with him. He is only source of his family for income and fee the family. The appellant discontinued education of their children from the date of removal from service due to shortage of money, as he has no other source of income to continue their children education.
18. That the appellant was on service dated 09/02/2022 GPS Badshah Mir Killi and transferred/deployed to GPS Zintara Landi Katal on 10/02/2022, appellant there reported for duty as per the order of the concerned authority. (Order copy dated 10/2/2022 annexed as annexure "G"). Subsequently cancellation of Redeployment Order No. 4197-4202 dated 10/02/2023, to Badshah Mir Killi Landi Katal on 10/05/2023 and due to 9th may 2023, law and order situation and all offices were closed, therefore, the appellant reported for duty at Badshah Mir Killi Landi katal on 16/05/2023 which was beyond the control of the appellant to report duty on 10/05/2023. (Copy of teachers attendance Register annexed as annexure "I"). As regards redeployment and political pressure is concerned, the appellant has nothing to do with it and it is all self created false story against the appellant. Moreover the appellant stated several times on different A

occasions to higher up to transfer/post me anywhere in the Khyber District of your choice, I have no objection to discharge duty of public interest in any place of District Khyber or oput side of Khyber..

19. *That Assistant Sub Division Education Officer (M) Circle-1 Landi Kotal visited for inspection on 19/05/2023 at GPS Badshah Mir Killi Landi Kotal. The Teacher Attendance Register of the said school reflected that on 19/05/2023 the appellant was on duty whereas TT teacher was on causal leave on that date. It is out question that appellant proxy was made by someone else as appellant was only one teacher there to perform duty at the said school on that particular day(i.e Appellant). The report submitted by the Assistant Sub Division Education Officer (M) Circle-1 Landi Kotal was based on false, concocted with malafide attention. (Copy of letter dated 19/05/2023 attached as annexure "J"). The Attendance Register has already been attached at para No. 18 (as annexure "I").*
20. *That the Respondent No.1 served upon explanation dated 16/05/2023, show cause notice dated 25/05/2023 and charge sheet dated 25/05/2023 to the appellant without fulfilling codal procedure/formalities for conducting inquiry against the appellant which was based on wrong , irrelevant and false information having no axis/related with ground reality.(Copies are annexed of explanation, show cause and charge sheet as K, M and O respectively).*
21. *That version/statement of the appellant was sufficient ground that the appellant is/was willing to perform his duties*

N

efficiently and effectively any place in District Khyber for the interest of public.

22. *That the Education Monitoring Authority regularly visited every school in Khyber District bi-monthly inspection and checking attendances of teachers and luckily the appellant in his entire service tenure never found late/absent from the school or made any adverse remarks in the service book or complaint to senior officer against the appellant.*
23. *That no one ever managed in my service tenure life to make a single day proxies in the teacher attendance Register and whereas the appellant signature in English hardly anyone to copy/proxy/sign on the appellant behalf therefore, question does arise to make proxies in the Teacher attendance register on behalf of the appellant. This is a false charge level against appellant, which shows their malafide attention and ulterior motives.*
24. *That the appellant further aggrieved from the impugned order dated 03/07/2023 as well as the act of the respondent No 4, hence the instant Service Appeal inter alia on the following grounds:-*

Grounds:-

- A. *That the impugned removal orders dated 03/07/2023 is illegal void, unlawful, without lawful authority and ineffective upon the rights of appellant; hence need to be set aside.*



- B. That the impugned order of respondent No 1 is illegal non speaking order, ambiguous as the appellant was not served properly/regular inquiry was conducted, so the appellant was not given a fair chance to proof his innocent in the instant case. The case of enquiry was closed in very short period again such precedent not on the education department record to finalize the case on such speed of time. Even a single letter was not dispatched by the education department on his home mail address regarding enquiry held up against the appellant which clearly shown their inefficiency and dishonesty to conduct the enquiry as per laid down policy.
- C. That the impugned order is illegal, against the law giving proper time to the appellant to submit his reply properly after consideration/contact with his senior in the department in such like situation executive/departmental authority has no power to pass the order against the appellant and the impugned order of respondent No 1 is liable to be set aside.
- D. That all the proceedings initiated against the appellant based on malafide and malicious and purportedly were initiated in order to displace the appellant from his post and appoint any other blue eyed.
- E. That prior to the issuance of impugned removal order no meaning full /purpose full chance of personal hearing was granted to the appellant, the impugned order is against the principles of natural justice.

- F. That the impugned order is in violation of Section 24-A of General Clause Act as the competent authority has failed to site any reason or justification in the said order.
- G. That it is well established principles of natural justice enshrined in the precedents of superior courts as well that where the competent authority is going to impose any penalty etc the regular inquiry to that effect is necessary.
- H. That the appellant was not willfully absent from her duties, but his absence was due to above mentioned mother serious illness.
- I. That during his entire service period the appellant performed his duties with full devotion and honesty and no single complaint etc have been filed against the appellant in this regard the appellant's punishment in the shape of removal from service is very harsh and major one, hence liable to be set aside.
- J. That the instant appeal is within time and this Honorable Tribunal has the jurisdiction to entertain the instant appeal.
- K. That any other grounds will be raised at the time of arguments with kind permission of this Honourable Tribunal.

It is, therefore, humbly prayed that on acceptance of this Appeal the impugned removal order dated 03/07/2023 passed by respondent No 1 may kindly be set aside and the appellant may kindly be re-instated in service with all

back benefits with such other relief as may deemed fit in the circumstances of the case may also be granted and respondent may kindly be directed to pay the outstanding salaries withheld by the respondents from 1st July, 2023.

Any other remedy, which deems fit by this Honourable Tribunal may also be granted in favour of appellant.

Dated:- 13/10/2013

Through:-

R.R.N
Appellant

Nasiruddin
Nasir uddin Yousafzai
Advocate High Court
Peshawar. Taimur Khanl
Advocate High Court
Peshawar.

Taimur Khanl
Taimur Khanl
Advocate High Court
Peshawar.

(11)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

Service Appeal No:- _____ /2023

Tijar Khan
[Redacted Name]

Versus

Dstl Edu Officer
[Redacted Name] (M)

..... Petitioner

..... Respondents

Khyber

AFFIDAVIT

I, Tijar Khan S/O Tawakal Khan ,PSHT Teacher , R/o
Landi Kotal District Khyber, (The petitioner) do hereby solemnly
affirm and declare on oath that the contents of the accompanying
Service Appeal are true and correct to the best of my knowledge
and belief and nothing has been concealed from this Honourable
Tribunal.

Identified by:-

Nasir uddi
Nasir uddi Yousafzai
Advocate High Court
0300-5958088
Bc-18-1590

Rel'n
DEPONENT 21203-7440460-3
CNIC No:- 21203-7440460-3
Cell No 0345-7156130
0345-7156130

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD
 APPOINTMENT ORDER

Consequent upon the approval of the Departmental selection committee the following trained PTC (Male) local candidates of Tehsil BKL Khyber Agency are hereby Temporarily appointed on contract basis against vacant PTC post in BPS No.7/PM plus usual allowances as admissible to them under the rules w.e.f 01.08.2006 their taking over charge in the schools noted against their names in the Interest of public services.

S.No	Name/Father's Name	Appointed at	Remarks
01	Remat Wali S/O Safdar Khan	GPS Jarobi (Pak Army Building)	Against Newly created post
02	Tajar-Khan S/O Tawakal Khan	...do..	...do...

Note:-

1. Charge report should be submitted to all concerned.
2. The appointment of the candidates has been made purely on contract basis and is liable to terminate without assigning any notice in case candidates wished to resign their services, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
3. They should produce their original academic/professional certificates/ Domicile before their taking over charge and attested copies thereof to be kept on the record of the school/office after the verification from the Board/University concerned.
4. They should produce their Health and Age certificate from the Agency surgeon concerned.
5. They should not be hand over charge, if they are below 18 years or above 33 years of age.
6. If they fail to report their arrival within 15 days the order will be treated as cancelled.
7. The order of the candidates is purely on regularly contract basis vide Govt. of NWFP Finance Department Notification No.6 (E&AD) 13-1/2005, dated 10/08/2005. They will not be paid their salaries until their documents are verified from the quarter concerned.
8. Trained local candidates are permissible for transfer any where against available vacant post on case to case basis.

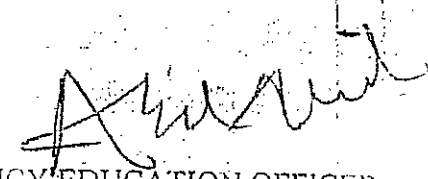
(MR. ABDUR RASHID QUARISHI)
 AGENCY EDUCATION OFFICER
 KHYBER AGENCY AT JAMRUD

Ends: No 11392-96/Khy. LKL

Dated 26-07-2006

Copy forwarded to the:-

1. Director of Education FATA (NWFP) Peshawar
2. Agency Accounts Officer Khyber at Jamrud.
3. AAEO (Concerned) local Office
4. Accountant local office
5. Candidates concerned.


 AGENCY EDUCATION OFFICER
 KHYBER AGENCY AT JAMRUD

Charge Report

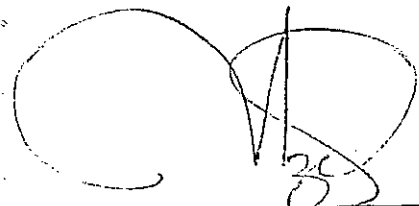
It is to certify that Mr. Tajir Khan S/o Tawkal Khan took

Charge as PSHT on 25-05-2021

In fore noon, at GHS Badshah mir Killi, LUL, khyber (primary Section), Under Enst: No 3815-22 / PSHT promotion, Faisal Iqbal, dated 24/05/2021.

It is written in order to be an acknowledgment.

Rah
25-05-2021


25/05/2021
HEAD MASTER
G.H.S Badshah Mir Killi
Landi Kotal



Khyber Pakhtunkhwa Elementary & Secondary Education Department

DISTRICT EDUCATION OFFICE
TRIBAL DISTRICT KHYBER AT JAMRUD
PHONE. 091-5820584 FAX 091-5820584

Dated 24 - 05 - 2021

NOTIFICATION:

Consequent upon the recommendation of Departmental promotion committee vide DEO office Khyber District No. 3146 - 49 dated 20-05-2021 and in pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(B&A)/1-18/E&SE/2012 dated 11/07/2012, the following Male SPSTs BPS-14 are hereby promoted to PSHTs BPS-15 @ (16120-1830-56020) with immediate effect in the public interest and posted at the station noted below:

S.No	Seniority No.	Name	Present Station	Proposed Place of Posting	Remarks
1	229	Tajir Khan	GPS Ghulam Dastagir	GPS Badshah Mir	Promoted
2	269	Irfan Ullah	GMPS Tedi Bazar	GPS Sher Afzal	Promoted
3	270	Khan Zeb	GPS Juma Baz	GPS Kaga Garha	Promoted
4	271	Muhammd Fayaz	GPS Dargai BZK	GPS Dargai BZK	Promoted
5	275	Sadiq Khan	GPS M; Ashraf Killi LKL	GPS Sarobi Loi Shilman	Promoted
6	279	Said Wali	GPS Alam Khel	GPS Alam Khel BZK	Promoted
7	280	Shekh Jan	GPS Landi Kotal No.1	GPS Sherin Killi BZK	Promoted
8	281	Aziz Wali	GPS Abdul Haleem	GPS Bacha Sobidar Killi	Promoted
9	283	Sami Ullah	GPS Noor Khel LKL	GPS Hakeem Khan	Promoted
10	284	Mahboob Sher	GPS Wazir Kor No.2 LKL	GPS Bar Shenoli Loi Shilman	Promoted
11	294	Haji Gul	GPS Habib Gul	GPS Spin Dhand Bara	Promoted
12	295	Mohammad Usman	GPS Sam Baba	GPS Sam Baba	Promoted
13	296	Mohammad Iqbal	GPS Karigar Ghari	GPS Karigar Garhi	Promoted
14	297	Zamin Ullah	GPS Sher Rehman	GPS Sher Rehman BZK	Promoted
15	298	Wahid Gul	GPS Abdul Ghafoor	GPS Kharghali LKL	Promoted
16	299	Pervez Kamal	GPS Qudrat Shah	GPS Lashora Jamrud	Promoted
17	301	Sarir Ullah	GPS Shamsher Jamrud	GPS Katta Kushta Jamrud	Promoted
18	304	Zarif Khan	GPS Sheikhmal Khel	GPS Durma Kor Loi Shilman	Promoted
19	305	Naeem Khan	GPS Zardad Killi Jamrud	GPS Zardad Killi Jamrud	Promoted
20	306	Qadeem Khan	GPS Dina Jan Bara	GPS Sultan Khel Bara	Promoted
21	308	Farid Ullah	GPS Ghafoor Khan	GPS Ghafoor Khan	Promoted
22	309	Muhammad Amin	GPS Ameer Khan	GPS Kam Shilman LKL	Promoted

Terms & Conditions:

1. They would be on probation for a period of one year, extendible for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Govt.

15
their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.

4. Charge report should be submitted to all concerned.
5. No TA/DA is allowed for joining him/her duty.
6. They will give an undertaking to be recorded in their Service Book to the effect that any over payment is made to him in the light this order will be recovered and if he is wrongly promoted, he will be reversed at any stage.
7. Professional and academic degree/ certificate required for promotion will be verified if found bogus he will be reverted and he will be handed over to law & Inforcement Agency.
8. Intra Seniority of PST/ PSHT/SPST will remain intact.

CONSEQUENTIAL TRANSFER.

S#	Name	Place of Posting	Remarks
1	Khial Muhammad, PSHT GPS Sarobi Loi Shilman	GPS Prang Dara Loi Shilman	A.V.P
2	Muhammad Nabi, PSHT Malang Kili BZK	GPS Char Bagh Landi Kotal	A.V.P
3	Izaz Ali, PSHT GPS Char Bagh LKL	GPS Malang Kili BZK	A.V.P
4	Jéhanzeb, PST GMPS Spenkie Tigga	GPS Juma Baz	A.V.P/ On Need Base
5	Irfan Ullah, PSHT GPS Misri Khel Takhtakaie Bara	GPS Yar Muhammad	A.V.P/ On Need Base
6	Irshad Khan, PSHT GPS Malakaie	GPS Sadu Khel Landi Kotal	A.V.P

(NISAR MUHAMMAD)
DISTRICT EDUCATION OFFICER
TRIBAL DISTRICT KHYBER AT JAMRUD

Endst: No 3815 - 22 / PSHT Promotion/ Faisal Iqbal

Dated 24 / 05 / 2021.

Copy for information and necessary action is forwarded to the:

- 1 Director E&SED KP Peshawar
- 2 Deputy Commissioner Khyber District at Peshawar.
- 3 Accountant General (PR) Sub Office, Peshawar.
- 4 District Accounts Officer Khyber District at Jamrud.
- 5 PS to secretary Finance NMTD Secretariat.
- 6 ADEG concerned local office.
- 7 Superintendent local office.
- 8 Individual concerned.

Faisal Iqbal/
SPST TO PSHT(M)


DISTRICT EDUCATION OFFICER
TRIBAL DISTRICT KHYBER AT JAMRUD

مخدمت جناب DEO صاحب ضلع خيبر
→ Annex C (16)

جناب عالی ا
(درخواست عہدہ E-Leave)

گزارش کنفورمور کے لئے کہ فدوی کی سروس تک کوترتیا
سترہ سال کے اور فدوی نے آج تک کوئی E-Leave
کی چھٹی نہیں لی ہے لیکن اب فدوی کی ماں فالج کی اسٹیک
سے صاحب فرمائش کے اور اس کے لئے میری تہماداری کی
ضرورت ہے۔

لہذا آپ صاحبان میرا ہائی کرکے مجھے 2023-05-24 سے
30-06-2023 (38 days) کی E-Leave چھٹی دیکر مستحکم
فرمائیے۔

فقط زیادہ آداب

المرقوم 22-05-2023

آپ کا تابع فرماں

تاج خان PSHT

گورنمنٹ پرائمری سکول بادشاہ خیر پور



Annexure 'D'

17

NOTIFICATION

1. Whereas, Mr. Tajer Khan PSHT GPS Badshah Mir BZK Landi Kotal District Khyber was proceeded against in accordance with Efficiency & Discipline Rules, 2011 for not reporting to his original place of posting GPS Badshah Mir BZK Landi Kotal after cancellation of his deployment vide this office order Endst: No. 4197-4202 dated 10/05/2023 in the interest of public service.
2. And whereas, he was charge sheeted vide No.4202 dated 25/5/2023 for not complying with the above mentioned office order.
3. And whereas, to dispense with inquiry in accordance with Rule-7 of the aforementioned rules a show cause notice was served upon him vide this office No.4908 dated 25/5/2023 for committed acts/omissions specified in Rule-3 i.e.
 - i. (a) inefficient or has ceased to be efficient for any reason;
 - ii. (b) guilty of misconduct;
 - iii. (d) guilty of habitually absenting himself from duty without prior approval of leave.
4. And whereas, he submitted his reply to the show-cause on dated 31/5/2023 which was found unsatisfactory.
5. And whereas, to hoodwink this office he reported to GPS Badshah Mir Killi on dated 16/5/2023 by managing few attendances through proxy and never performed duty even for a single day since he reported.
6. And whereas, he was called for personal hearing vide No.5382-87 dated 01/6/2023 to personally attend the office of the undersigned and clarify his position.
7. And whereas, during personal hearing, giving preference to his personal convenience over his national duty to provide teaching to the needy students at his original duty station GPS Badshah Mir Killi BZK Landi Kotal where he had been placed on his promotion to PSHT, he flatly refused to comply with the orders of this office and perform duty at GPS Badshah Mir Killi BZK Landi Kotal.
8. AND WHEREAS, the Competent Authority, after having considered the charges, evidence on record, reply to the show cause and his flat refusal during his personal hearing to perform his official duty at GPS Badshah Mir Killi BZK Landi Kotal has come to the conclusion that the charges contained in the charge sheet/show cause against Mr. Tajer Khan PSHT GPS Badshah Mir Killi BZK Landi Kotal have been proved to the extent of penalization under Rule-4 (b) of the above mentioned Rules.
9. NOW THEREFORE, in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011, the District Education Officer (M) Khyber, Khyber Pakhtunkhwa as the Competent Authority is pleased to impose the major penalty of "Removal from Government Service" upon Mr. Tajer Khan PSHT GPS Badshah Mir Killi BZK Landi Kotal as specified in Rule-4 (b) (iii) of the above mentioned Rules with immediate effect in the interest of public service.

(Muhammad Uzair All)
Competent Authority
District Education Officer (M)
E&SE Khyber, Khyber Pakhtunkhwa

Endst: Even No. 6122-28

Date: 03/7/2023

Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
2. Deputy Commissioner District Khyber.
3. District Accounts Officer Khyber.
4. District Monitoring Officer Education Monitoring Authority Khyber.
5. SDEO concerned.
6. Ex-Official concerned.
7. Master File.

Competent Authority
District Education Officer (M)

(18) 'E' Kameer
خدمت جناب DEO صاحب ضلع جسر

جناب عالی!
عنوان: جواب طلبی

گزارش حضور الوریج کہ فدوی گورنمنٹ پرائمری سکول بادشاہ میر علی میں
بطور PSHT کام کر رہا ہے۔ چار دن پہلے آپ صاحبان نے فدوی سے ڈیوٹی
کے بارے میں جواب طلب کی ہے کہ آپ نے میرا آرڈر نمبر 420-4197 فالو
نہیں کیا ہے لہذا یہ حقیقت پرمبنی بات نہیں ہے بلکہ میں نے اپنا چارج 16 مئی
کو خالی کیا ہے تاہم راستے میں کچھ وارڈوں کی مسائل کی وجہ سے فدوی پر وقت
نہ دیا جاسکا بلکہ 9:45 پر پہنچا جس سے پہلے EMA والوں نے بھی سکول کا فرٹ
کرایا تو تاہم کمرہ میں نے اپنی ڈیوٹی جوائن کی۔

دوسری بات آپ نے سیاسی پرائمری کی ہے لہذا میں نے کسی کو سیاسی
سواء میں کے لیے کیلی ہے اور نہ ہیوں گا تاہم اگر میرے والد نے کسی کو کہا ہے
تو وہ اس بات کے اور وہ بھی آئندہ کیلئے نہیں ہوگا۔

امید ہے پھر دو دن بعد فوراً ماسٹری

عمر پرائرار

DEO
20/5

تاج محمدان PSHT

گورنمنٹ پرائمری سکول بادشاہ میر

ادارہ تعلیمات ڈی ای او صاحب صاحبہ
Annexure (19)
شماره عالی ۱۰

خواتین اے او ایس سروکار لوئیں

سرکار میں ملنے والے اس بارے میں جواب سے مجھ کو 25-05-2023 کو جواب
اور لوئیں جاری کی گئے۔ میں نے آپ صاحبان سے کہا ہے کہ اے او ایس میں سرکاری
پہلو اور آپ ڈی اے او ایس میں تعلیمات سے ہیں آپ اے او ایس میں سرکار کے پیشہ ورانہ
معاہدہ سے مستعفی ہیں، علاوہ اس کے معاملہ میں میں نے جو کہ سرکاری ADEO سے
جواب دیا ہے۔ میں نے سرکاری آپ صاحبان کو آرڈر سے فالو اپ کیا ہے۔ میں نے ڈی اے او ایس
کو اس کی بجائے باقی رہا جس کی Leave سے یہ معرا قانونی حق ہے کہ یہ میری جانب
تعمیر کے لئے ہے۔ اس کے علاوہ میں نے اس کی تعمیر جاری کیلئے میں نے
24-05-2023 سے 30-06-2023 تک آپ صاحبان کیلئے رہی تھی کی درخواست دی ہے
جس کے لئے آپ بھی آپ صاحبان سے مؤدبانہ گزارش ہے۔
باقی رہا آپ صاحبان سے میرے خلاف ایسا ہیجے کے ادارہ جو کارروائی کی
گئے اس سے دائمیات کی او آئی ہے جو کہ ایسا ہیجے سے نمایاں بنان ہیں
آپ صاحبان کو کسی سے شرط معلومات فراہم کی ہے کہ یہ نگران اور سر تاج محمد
آمریلی کا ناموں زاری ہے اور آپ صاحبان اس سے ذاتی اختلافات کی سرا
لئے دے رہا ہے۔

میرا آپ صاحبان سے مؤدبانہ گزارش ہے کہ میرے خلاف یہ استقامتی کارروائی
روک کر شکور مرادیں اور میرے لئے 24-05-2023 سے 30-06-2023
تک E-Leave چھٹی کی ضرورت ہے اور سر تاج محمد

Dr. / 23
23/5/23

عمر گلزار
ناخبر خان
PSHT
Date: 31-05-2023

ADEO (Pn)
For further
Process
23

اپیل نمبر (20) ڈائریکٹر انٹرویو سہ ماہیہ ضلع فیصل آباد کے متعلق

گزارش قابل غور ہے کہ بندہ گزشتہ ستمبر سال سے بطور پریسٹر سیکورٹی
ڈیوٹی کام کرتا رہا لیکن پچھلے ایک مہینے سے ڈیوٹی کو متکون نہیں رہا ہے
کہ مسئلے کا سامنے آیا جس کے لیے بندہ سیکورٹی ڈیوٹی سے غائب ہو گیا
کیلئے DEO صاحب ضلع فیصل آباد کو درخواست دی لیکن وہ یہ کہہ کر
بندہ کسی طور پر بھی DEO صاحب کو مستطین نہ کر سکا اور انہوں نے
بالا خر کارروائی کر کے مجھے سرورس سے ریجسٹر کیا
حساب والا بندہ زندگی کے مشترکہ وطن عزیز کے بچوں کی خدمت کی
اور اب بندہ کسی اور کام کاج کے قابل نہیں رہا جبکہ ڈیوٹی کے
جوٹے چھوٹے گئے ہیں

اس لیے آپ صاحبان میں سے کسی کو دوبارہ سرورس میں
مجانے کے احکامات صادر نہ کرنا مشکل فرمائیں۔ ڈیوٹی آپ
کے لیے دعا گو رہے گا۔

امید ہے پھر وہ اہم طور پر رہا کرتے

فقیر یادہ آداب

عزیز گرام

تاج محمد خان PSMT

ضلع فیصل آباد

Date: 07-07-2023

Reln

رجسٹر حاضری مدرسہ

ماہ: 2023 (May) من: اجتماع

رقم	مدرسہ بنیاد		مدرسة الخليل		PTC Hired		T.T	
	وقت	اسم	وقت	اسم	وقت	اسم	وقت	اسم
1								
2	7:30	مبارك	7:30	مبارك	7:30	مبارك	7:30	مبارك
3								
4								
5								
6								
7								
8	7:30	مبارك	7:30	مبارك	7:30	مبارك	7:30	مبارك
9								
10								
11								
12								
13								
14								
15	7:30	مبارك	7:30	مبارك	7:30	مبارك	7:30	مبارك
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								

تقریر وقت	وقت	موضوع	مدرسہ بنیاد	مدرسة الخليل	PTC Hired	T.T
اولی						
ثانی						
تیسرا						
چوتھا						

Handwritten notes and signatures in the bottom left corner.

~~Signature~~ 6692
Annex 'J' (S) (22)

To

Sub-Divisional Education Officer (Male)
Landi-Kotal

Subject

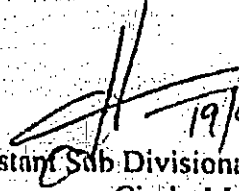
NON COMPLAINTS OF ORDER ISSUED BY DEO (M) KHYBER IN RESPECT OF MR. TAJIR
KHAN PSHT, GPS BAD SHAH MIR KILLI LKL.

Memo.

I am refer to the subject noted above and to state that is verbally directed by the
worthy DEO (male) Khyber the undersigned visited GPS Bad Shah Mir Killi LKL in the connection of
checking the compliance of order issued by DEO Khyber vide his Notification No. 4197-4202, Dated
10.05.2023.

It is further state Mr. Tajir Khan PSHT GPS Bad shah Mir Killi LKL did not obey the order
of the worthy DEO Khyber and did not took over charge in the said station ^{as} his order has been
cancelled.

The case is forwarded for further necessary action and order please.


19/05/23
Assistant Sub-Divisional Education Officer (M)
Circle-I Landi-Kotal



DISTRICT EDUCATION OFFICE
DISTRICT KHYBER AT JAMRUD
PHONE: 091-5820584 FAX 091-5820584
No: _____ DATED: _____ / _____ /2023

Annex K- (23)

EXPLAINATION

You,

Mr. Tajar Khan PSHT BPS 15 GPS Badshah Mir BZK Landi Kotal District Khyber had been redeployed to GPS Zintara Landi Kotal, which has been duly cancelled vide this office Endst.No: 4197-4202 dated, 10/05/2023 in accordance with policy of the Govt. Instead of complying with the cancellation order, you are busy in exerting political pressure to sustain with your illegal redeployment/detailment.

You are therefore, directed to clarify your position as to why disciplinary action should not be initiated against you under the E & D Rules 2011.

Your satisfactory reply along with the compliance report in respect of this office order Endst.No. 4197-4202 dated, 10/05/2023 must reach, positively, this office within 03 days of the issuance of this order to avoid initiation of formal disciplinary proceedings against you.

(MUHAMAMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Dated 16/05/2023

Endst: No. 4516-21

Copy of the above is forwarded to the;

1. Director Education (KP E&SED) at Peshawar.
2. Deputy Commissioner District Khyber at Peshawar.
3. SDEO (CM) Landi Kotal.
4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhawa.
5. EMIS Local Office.
6. Office Copy.


DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD



OFFICE OF THE DISTRICT EDUCATION OFFICER
KHYBER AT IAMRUD
NO. 4908/EDU DATED 25/05/2023
Email: DEOKHYBER7777@gmail.com

Annexure "M" (24)

Show Cause Notice

I, Muhammad Uzair Ali, the District Education Officer (M) Elementary & Secondary Education Khyber, Khyber Pakhtunkhwa as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you Mr. Tajer Khan PSHT GPS Badshah Mir BZK Landi Kotal District Khyber this show cause notice as follows:

1. That you had been posted on promotion as PSHT BS-15 at GPS Badshah Mir BZK Landi Kotal on 25/5/2021 but you ultimately got yourself redeployed at GPS Zin Tara Landi Kotal by using political sources on 17/02/2022.
2. That later on your redeployment was cancelled but, again, you were successful in retaining your redeployment at GPS Zin Tara.
3. That considering the dire shortage of teaching staff and government directions, your redeployment was cancelled vide this office Endst: No.4197-4202 dated 10/05/2023 whereby you were directed to report in GPS Badshah Mir BZK with immediate effect in the interest of public.
4. That instead of complying with the order of the competent authority as mentioned above you again resorted to put political pressure for cancellation of the order for your own personal convenience in utter disregard of your official duty in public interest.
5. That consequent upon your non-compliance, explanation was called from you vide this office Endst: No.4516-21 dated 16/05/2023 wherein you were again directed to comply with the order in public interest.
6. That as per detailed report of the circle ASDEO dated 24/5/2023, finally, you reported to your original/assigned place of posting on 16/5/2023 after hectic efforts by the concerned ASDEO to persuade you to comply with the orders in the interest of public service but after reporting at GPS Badshah Mir, instead of regularly attending duty, you left your school for french-leaves without prior approval of the competent authority which proved your non-seriousness about official duty, wilful absence, proxy attendance, defiance of the service rules, non-compliance of directions of your superiors and misconduct.
7. That after going through the report of the circle ASDEO, evidences, your service conduct and material on record, and to dispense with inquiry in accordance with Rule-7 of the aforementioned rules, I am satisfied that you have committed acts/omissions specified in Rule-3 i.e.
 - i. (a) inefficient or has ceased to be efficient for any reason;
 - ii. (b) guilty of misconduct;
 - iii. (d) guilty of habitually absenting himself from duty without prior approval of leave;
3. That in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, I as the Competent Authority have tentatively decided to impose upon you any of the major penalties mentioned in Rule-4 (b) of the ibid rules.
4. You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate in writing whether you desire to be heard in person.
5. If no reply to this show cause is received within 7 days of its receipt, it shall be presumed that you have no defense to put in and, in that case, an Ex-Parte decision shall be taken against you.

(Muhammad Uzair Ali)
Competent Authority
District Education Officer (M)
E&SE Khyber, Khyber Pakhtunkhwa.

Endst: Even No. 4909-13 Date. 25/05/2023

Copy of the above is forwarded for information to the: -

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
2. Deputy Commissioner District Khyber.
3. SDEO concerned.
4. Official concerned.
5. Master File.

Competent Authority
District Education Officer (M)
E&SE Khyber, Khyber Pakhtunkhwa

Mr. Tajer Khan PSHT GPS Badshah Mir BZK, Landi Kotal, District Khyber.

Annexure "0" (25)



OFFICE OF THE DISTRICT EDUCATION OFFICER KHYBER
NO. 1903/EDU DATED 25/05/2023
Email: DEOKHYBER7777@gmail.com

CHARGE SHEET

I, Muhammad Uzair Ali, the District Education Officer (M), as competent authority under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 do hereby charge you, Mr. Tajer Khan PSHT GPS Badshah Mir BZK Landi Kotal as follow:

That, on account of continuous defiance of government service rules, you have committed the following acts/omissions:

1. You had been posted on promotion as PSHT BS-15 at GPS Badshah Mir BZK Landi Kotal on 25/5/2021 but you ultimately got yourself redeployed as GPS Zin Tara Landi Kotal by using political sources on 17/02/2022.
2. Later on, your redeployment was cancelled but you managed to stick with your redeployment at GPS Zin Tara in utter disregard of your services direly needed at your original/assigned place of duty at GPS Badshah Mir BZK Landi Kotal.
3. Considering the dire shortage of teaching staff, your redeployment was cancelled vide this office Endst: No.4197-4202 dated 10/05/2023 whereby you were directed to report in GPS Badshah Mir BZK with immediate effect in the interest of public interest.
4. Instead of complying with the order of the competent authority as mentioned above you again resorted to put political pressure for cancellation of the order for your own personal convenience in utter disregard of your official duty in public interest.
5. Thereupon explanation was called from you vide this office Endst: No.4516-21 dated 16/05/2023 wherein you were again directed to comply with the order in public interest.
6. You, finally but reluctantly, reported to your original place of posting on 16/5/2023 after hectic efforts by the concerned ASD:O to persuade you to comply with the orders in the interest of public service but after very soon after reporting at GPS Badshah Mir, instead of regularly attending duty, you left your school for french-leaves without prior approval of the competent authority which proved your non-seriousness about official duty, willful absence, proxy attendance, defiance of the service rules, non-compliance of directions of your superiors and misconduct.
7. By reason of the above, you appear to be guilty of (i) inefficiency (ii) misconduct & (iii) habitually absence from duty without prior approval of leave within the meaning of Rule-3 (a), (b) & (d) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, and have rendered yourself liable to all or any of the penalties specified in Rule-4 (b) of the Rules ibid.
8. You are, therefore, required to submit written defense in reply to the show cause notice attached with this charge sheet within seven days of its receipt to the undersigned failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

Note: Opportunity of personal hearing may be granted on written request.

(MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Endst: No. 1903-07

Dated: 25/05/2023

Copy of the above is forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
2. Deputy Commissioner Khyber at Peshawar House.
3. SDEO concerned.
4. Official concerned.
5. Office Copy.

5/6

DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

OFFICE OF THE DISTRICT EDUCATION OFFICER KHYBER
Email: DEOKHYBER7777@gmail.com

Annex N^o (26) - A

SUSPENSION ORDER

Consequent upon report of SDEO Landi Kotal., the competent Authority is pleased to suspend the services of Mr. Mubarak Shah TT GPS Badshah Mir BZK Landi Kotal District Khyber on account of proxy attendance in respect of Mr. Tajar Khan PSHT with immediate effect in the interest of public Service and consequent upon this suspension order, further proceeding against the official are being initiated under E & D Rules, 2011.

(MULHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD
Dated 25/05/2022

Endst.No. 21937-43

Copy of the above is forwarded to the:

1. Director Elementary & S E D Khyber Pakhtunkhawa.
2. Deputy Commissioner Khyber at Peshawar House.
3. District Accounts Officer Khyber at Jamrud.
4. SDEO Landi Kotal District Khyber.
5. ADEO Primary Local Office.
6. Official Concerned.
7. Office Copy.


DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

26

AFGHAN
Clinical Laboratory
Near District Head Quarter Hospital Landi Kotal



افغان کلینیکل لیبارٹری
نزد و سٹریٹ ہیڈ کوارٹر ہسپتال لنڈی کوتل
فون: 0345-4627749 - 0333-6366949 - 0301-8055549

Patients Name M/O Tajir Khan Age 68 Sex ♂

Test Required ABC Date 16/5/2023

SEROLOGY / IMMUNOLOGY / HAEMATOLOGY

Test	Unit	Normal Values	Test	Normal Values
Hb	g/dl	F,12-16 M,14-18	Blood Group	
TLC	/cmm	4000-11000	Rh Factor	
RBC	Million/cmm	F3.5-4.5 M4.0-60	MP	
DLC:				
Neutrophils	%	40-75	Hbs Ag	
Lymphocytes	%	20-45	HCV	
Eosinophil	%	01-06	Rheumatoid Factor	
Monocytes	%	01-06	A.S.O Titre	(Less than) 200iu/ml
Basophil	%		Pregnancy	
ESR	mm/1st Hour (w/g)	F0-15 M0-10	Bleeding Time	min Second upto 3min
Widal Test			Clothing Time	min Second upto 7min
	TO	TH	Typhidot	
	AO	AH	Anti Boldies IgG	
Brucells Test			Anti Bodies IgM	
	Abortus		HIV	
	Melitensis		Sputum for AFB	
Platelet Count	/cmm	1.5-4.5lakh	H. Pylori	
R.B.C Morphology			K.T. (V.D.R.L)	
Toxoplasmosis			L.D Bodies	
IgG Anti Bodies			G6PD	(15-60)min
Igm Anti Bodies			Dengue	
RV:			Torch	
CMV:			Trop - T	
HSVI:			Trop -I	
HSVII:			ICT for TB	
Remarks				

AFGHAN

Clinical Laboratory

Near District Head Quarter Hospital Landi Kotal



افغان کلینیکل لیبارٹری

زوڈسٹرکٹ ہیڈ کوارٹر ہسپتال لنڈی کوتل

نظر شاہ: 0345-4627749 - 0333-6366949 - 0301-8055549

27

Patents Name MU/O Tejinder Kaur Age 62 Sex F

Test Required RFTS - RBS - Lipid Profile Date 16/05/2022

CHEMICAL PATHOLOGY

TEST	RESULT	UNITS	Reference Range	TEST	RESULT	UNITS	Reference Range
Glucose F		mg/dl	70-110	CARDIAC ENZYMES			
Glucose R	315	mg/dl	70-150	SGOT (AsT)		u/l	M 0-37 F 0-31
HEPATIC PROFILE				CPK		u/l	M 15-30 F 15-100
Bilirubin Total		mg/dl	0-1.0	CK MB		u/l	0-24
Bilirubin Direct		mg/dl	0-0.3	LDH		u/l	105-135
Bilirubin Indirect		mg/dl		LIPID PROFILE			
SGPT (ALT)		u/l	M=0-43 F=0-36	Total Lipids		mg/dl	400-1000
Alkaline Phosphatase		u/l	Adult 250 Child 500	Triglyceride	214	mg/dl	70-150
Total Proteins		G/dl	6.6-8.7	Serum Cholesterol	174	mg/dl	150-200
Albumin		G/dl	3.8-4.4	HDL	44	mg/dl	M35-55F45-65
Globulin		G/dl	1.8-3.6	LDL	112	mg/dl	Less than 150
A/G Ratio			1.1-2.2	MISCELLANEOUS			
RENAL PROFILE				Calcium		mg/dl	8.1 - 10.4
Urea	34	mg/dl	10-40	Phosphorous		mg/dl	3.0-4.5
Creatinine	2.0	mg/dl	0.6-1.2	Acid Phosphatase		u/l	4.0-13.5
Uric acid	4.6	mg/dl	M 3.4-7.0 F 2.4-5.7	Amylase		u/l	0-90
ELECTROLYTES				Test		Unit	
Sodium		mEq/l	136-149	HBAIC		%	4.20 - 6.50%
Potassium		mEq/l	3.8-5.2				
Chloride		mEq/l	98-107				

REMARKS :

Lab Incharge: Muntazir Shar

28

AFGHAN
Clinical Laboratory
Near District Head Quarter Hospital Landi Kotal



افغان کلینیکل لیبارٹری
نزد ڈسٹرکٹ ہیڈ کوارٹر ہسپتال لنڈی کوتل
متنظر شاہ: 0345-4627749 - 0333-6366949 - 0301-8055549

Patents Name M/O Tujir Khan Age _____ Sex P

Test Required RBS, RFTS Date 27/05/2023

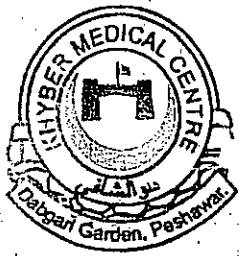
CHEMICAL PATHOLOGY

TEST	RESULT	UNITS	Reference Range	TEST	RESULT	UNITS	Reference Range
Glucose F		mg/dl	70-110	CARDIAC ENZYMES			
Glucose R	<u>210</u>	mg/dl	70-150	SGOT (AsT)		u/l	M 0-37 F 0-30
HEPATIC PROFILE				CPK		u/l	M 15-30 F 15-100
Bilirubin Total		mg/dl	0-1.0	CK MB		u/l	0-25
Bilirubin Direct		mg/dl	0-0.3	LDH		u/l	105-135
Bilirubin Indirect		mg/dl		LIPID PROFILE			
SGPT (ALT)		u/l	M=0-43 F=0-36	Total Lipids		mg/dl	400-1000
Alkaline Phosphatase		u/l	Adult 250 Child 500	Triglyceride		mg/dl	70-150
Total Proteins		G/dl	6.6-8.7	Serum Cholesterol		mg/dl	150-200
Albumin		G/dl	3.8-4.4	HDL		mg/dl	M35-55F45-65
Globulin		G/dl	1.8-3.6	LDL		mg/dl	Less than 150
A/G Ratio			1.1-2.2	MISCELLANEOUS			
RENAL PROFILE				Calcium		mg/dl	8.1 - 10.4
Urea	<u>32</u>	mg/dl	10-40	Phosphorous		mg/dl	3.0-4.5
Creatinine	<u>1.2</u>	mg/dl	0.6-1.2	Acid Phosphatase		u/l	4.0-13.5
Uric acid	<u>4.2</u>	mg/dl	M 3.4-7.0 F2.4-5.7	Amylase		u/l	0-90
ELECTROLYTES				Test		Unit	
Sodium		mEq/l	136-149	HBAIC		%	4.20---6.50%
Potassium		mEq/l	3.8-5.2				
Chloride		mEq/l	98-107				

REMARKS:

Lab Incharge: Muntazir Shah

(29)



Dr. Aftab Afridi

MBBS (King Edward)
MRCS (Edinburgh)
FCPS (Pakistan)
Specialist Ophthalmologist

Dec
18
245796

Laghida

68yrs

18/5/2023

-C/O:-

-DMT

↓ vision REs

-HTN

HC of stroke

-OE :-

VA = PL⁺

1 PL⁺

R^o cataract

Adv!

(L⁺ Phaco / ECC E + IOL

(R)

K1 → 43.00
K2 → 44.50

(L)

K1 → 44.75
K2 → 45.00

(R) 19.00 (L) 19.00

m. a.
DR. AFTAB AFRIDI
Eye Specialist & Surgeon
MBBS (King Edward) MRCS (UK)
FCPS (Pak)

30



KHYBER MEDICAL COMPLEX

Dabgari Garden Peshawar.

DISCHARGE SHEET

Patient Identification	
Name:.....	Latghida
Age:.....	68y
Sex:.....	F
Bed No:.....	18
Reg No,.....	245796
Visit ID.....	8626952
Date of Admission:.....	
Date of Discharge:.....	

Consultant Name: Dr- Aftab Afridi

Diagnosis (C) Cataract

OPERATION NOTES

Findings (C) Decrease vision.

Procedure (C) Extra capsula.

Hospital Treatment

Home Treatment (گھر کیلئے علاج) FD maxigen

FD maxiden

Foil Amgydese

Condition at Discharge Satisfactory

Followup Instructions

1. (2) صبح اور شام کو آنکھ کھلوانیں۔
2. دوبارہ معائنہ کیلئے (1) آئیے۔
3. تکلیف کی صورت میں کسی بھی وقت ڈاکٹر سے مشورہ کر لیں۔

Date: 19-5-2023

On Duty Doctor Sign: [Signature]

DR. AFTAB AFRIDI
MBBS (P) (FCPS) (P)
[Stamp]

Professor

Dr. Zafar Hayat

31

CLINIC

Khyber Medical Centre,
Dabgul Garden, Peshawar,
Flat No: 1-2-40, Floor "C"
Phone: 2211241-49 Ext. 3084

M.B.B.S. F.C.P.S. (Pak) M.R.C.P. (Ireland)
F.R.C.P. (Ireland), F.R.C.P. (Edin), Fellow (PSIM)
Ex. Professor & Head of Department of Medicine
AMCSTH,
Khyber Medical College
Ex. Ex. Physician Medical Wing
K.T.H. Peshawar.

NOI
VALID
FOR

CERTIFICATE OF MEDICAL LEGAL PURPOSES

Patient's Name Mrs. Tajir Khan Age 68 Gender F Date 01/6/23

Clinical Record

Prx

Presenting Complaint

Body Aches

Temp: *99.0*

BP: *160/90*

Gynae / Obs *4*

Issues: *8*

Last Issue: *4/23*

Cycle: *10*

Weight: *70kg*

Height:

Age:

*Tab Gabapentin 800
L.M. 0 + 0
Tab Naproxen 400
C.P. = 1000 0
Tab Naproxen 400
C.P. = 500 0
Tab Naproxen 400
C.P. = 500 0
Tab Naproxen 400
C.P. = 500 0*

(32)

PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: **Tajir Khan**


Father Name: **Taqi Khan**

Gender: **M** Country of Stay: **Pakistan**

Identity Number: **21203-7440460-3** Date of Birth: **12.01.1982**

Date of Issue: **15.01.2023** Date of Expiry: **15.01.2033**

Holder's Signature: *Tajir Khan*



PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: **Muhammad Numan**


Father Name: **Tajir Khan**

Gender: **M** Country of Stay: **Pakistan**

Identity Number: **21203-7801915-1** Date of Birth: **02.05.2002**


Date of Issue: **12.01.2021** Date of Expiry: **12.01.2031**

Holder's Signature: _____



حکومت پاکستان
کومی شناختی کارڈ
21203-7896402-0

نام: **علی خدا**
جنس: **عورت**
تویہ کورم: **تاجیر خان**
شناختی نمبر: **21203-7896402-0**
تاریخ پیدائش: **01/01/1955**



PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: **Nazeefa**


Husband Name: **Tajir Khan**

Gender: **F** Country of Stay: **Pakistan**

Identity Number: **21203-8594137-8** Date of Birth: **01.01.1988**


Date of Issue: **12.02.2023** Date of Expiry: **12.02.2033**

Holder's Signature: _____



حکومت پاکستان
کومی شناختی کارڈ
21203-7441315-3

نام: **تاجیر خان**
جنس: **مرد**
تویہ کورم: **تاجیر خان**
شناختی نمبر: **21203-7441315-3**
تاریخ پیدائش: **11/03/1953**



21203-7801915-1
کونسل، ضلع خیر
کونسل، ضلع خیر



101461160579

Registrar General of Pakistan

گشده کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں



21203-7440460-3
کونسل، ضلع خیر
کونسل، ضلع خیر
Registrar General of Pakistan
101461201150
140-82-177186

گشده کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں




21203-8594137-0
کونسل، ضلع خیر
کونسل، ضلع خیر
Registrar General of Pakistan
510251030120

گشده کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

X62T1R 21203-7896402-0
کونسل، ضلع خیر
کونسل، ضلع خیر
مستقل پتہ: ایف
تاریخ: 27/08/2021
گشده کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں



X62T1R 21203-7441315-3
کونسل، ضلع خیر
کونسل، ضلع خیر
تاریخ: 06/02/2014
140-53020151



33

حکومت پاکستان
نیشنل ڈیٹا بیس اینڈ رجسٹریشن اتھارٹی (وزارت داخلہ)
انٹارہ سال سے کم عمر بچوں کا سرٹیفکیٹ *

RC No: 19686186

21203-7440460-3

درخواست دہندہ کا شناختی کارڈ نمبر

تاجر خان

درخواست دہندہ کا نام:

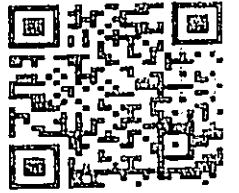
نمبر شمار	بچے کا نام اور رجسٹریشن نمبر	والد کا نام اور شناختی کارڈ نمبر	والدہ کا نام اور شناختی کارڈ نمبر	جنس / رشتہ	پیدائش کا مقام پاکستان	تاریخ پیدائش
1	حفصہ 21203-9603771-4	تاجر خان 21203-7440460-3	باریہ 21203-8594137-8	لڑکی	لنڈی کوتل، خیبر پختونخوا	2006-06-24
2	یانیہ 21203-7738570-6	تاجر خان 21203-7440460-3	باریہ 21203-8594137-8	لڑکی	لنڈی کوتل، خیبر پختونخوا	2008-04-02
3	حقیہ بی بی 21203-1082564-4	تاجر خان 21203-7440460-3	باریہ 21203-8594137-8	لڑکی	لنڈی کوتل، خیبر پختونخوا	2011-05-02
4	فرح بی بی 21203-4123621-2	تاجر خان 21203-7440460-3	باریہ 21203-8594137-8	لڑکی	لنڈی کوتل، خیبر پختونخوا	2013-11-19
5	نعمین اللہ 21203-0950546-5	تاجر خان 21203-7440460-3	باریہ 21203-8594137-8	لڑکا	لنڈی کوتل، خیبر پختونخوا	2018-08-21

- 1- اس نمٹلی کے مندرجہ بالا انٹارہ سال سے کم عمر 5 بچے ا بچوں کا اندراج ہمارے ریکارڈ میں موجود ہے۔
- 2- درج شدہ بچے کی عمر انٹارہ سال ہوتے ہی شناختی کارڈ کے حصول کیلئے درخواست جمع کروائیں۔
- 3- اس سرٹیفکیٹ کو منبھال کر رکھیں کیونکہ بچوں کے انٹارہ سال کی عمر کو بچتے ہر ای عمر کو ان کے حوالے سے شناختی کارڈ جاری کیے جائیں گے۔
- 4- نوزائیدہ بچے کا فوری طور پر اندراج کروائیں اور نیار رجسٹریشن سرٹیفکیٹ حاصل کریں۔
- 5- کوائف کی تبدیلی کی صورت میں نیار رجسٹریشن سرٹیفکیٹ حاصل کریں۔

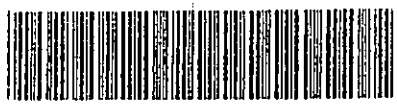
عثمان یوسف سید

مستند رجسٹرار جنرل

2020-11-03 10:02:34



ڈاک خانہ لنڈی کوتل، وی خیل، تحصیل لنڈی کوتل، ضلع خیبر پختونخوا



2120374404603

یہ سرٹیفکیٹ درج بالا بچوں کی شناخت اور منہ کورہ والا کوائف و معلومات ثابت کرنے کیلئے کاروبار کے دستخط (916) دارالذی نہیں بجز 2000 بطور ثبوت قابل قبول ہے۔

(34)

Tajir Khan Pte

SERVICE BOOK

OF

Mr. Tajir Khan P/O Taulak Khan

S/o _____

Designation P. E. S.P. Jambhi Pak: 01500/1310

Department Education FATA

Price : Rs. 20.00

PRINTED BY:

STATIONERY & PRINTING DEPARTMENT, GOVERNMENT OF N.W.F.P., PESHAWAR.

(For use in Police Department only)

Note: The 9 am

Heirs:

1.		1.	Name
2.		2.	Race
3.		3.	Resi

Verification Roll No. _____ dated _____ received back _____

Passed SSC Examination from BISE
 Peshawar Under Roll No 13250 Session
 1998 Annual marks obtained 462/850
 In Grade (C) Verified with original Impression
 Peshawar No 3018/01 Date 25/9/2006

Agency: _____ Station Officer,
 Khyber Agency at Jampur

Qualification	Date	Qualification	Date
---------------	------	---------------	------

Passed Intermediate Examination from
 BISE, Peshawar Under Roll No 14345
 English First Arts

Session 2000 Supplementary marks obtained
 559/1100 in grade (C). Verified vide
 Peshawar No. 6362/Under 10-01/BISE
 dt 17/2/2006

Urdu Agency: _____ Station Officer,
 Khyber Agency at Jampur

Passed PTC Examination from
 Plan-drawing Training School Final examination
 Allama Iqbal Open University Islamabad

Under Roll No J614204 in Spring
 Finger Print Other qualification:—
 Semester 2001 marks obtained 52% in
 grade (C) Result declared on 17/1/2002.

Drill Instructor (C) A1001 Islamabad No. 64/401
 dt 1/9/06

Court Duties Agency: _____ Station Officer,
 Khyber Agency at Jampur

Reserve Duties

N.B.— Line to be drawn under the qualification possessed.

P. No - 00423518

Note: The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name: TAJIR KHAN

2. Race: Wali Khel

3. Residence: Village Sultan Khel Wali Khel Tehsil Landi Kotah Khyber Agency.

4. Father's name and residence: Tawakal Khan (as above)



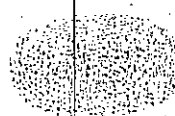


5. Date of birth by Christian era as nearly as can be ascertained: 12/01/1982. Twelfth January N.H. Eighty Two.


6. Exact height by measurement: 5 - 5

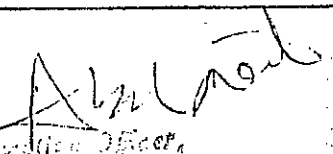
Date

7. Personal marks for identification: Mark on Rt. left cheek.

8. Left hand thumb and finger impression of (Non-Cazetted) officer:

Little Finger		Ring Finger	
Middle Finger		Fore Finger	
Thumb			

9. Signature of Government Servant: 

10. Signature and designation of the Head of the Office, or other Attesting Officer. 
Agency Education Officer,
Khyber Agency of Landi Kotah

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant	Signature and Date of the head of the office or other attesting officer in attestation columns 11
PTC post. GPS Jaraab. Pak Army Building	Off / Temp		Rs = 2555/-			8 1/2006 Ptd.	R. Khan	A. E. Hyderabad
		Revision of pay on 1/7/2007				87 (2940-160-7740)		
			Rs = 2940/-			1/7/2007	R. Khan	
		Revised Entries allowed BPS 9				1/12/2007	R. Khan	
		(2770-165-7920)	Rs = 3100/-					
						1/8/2006	R. Khan	
		Revision of pay on 1/7/2007				BPS 9 (3185-190-5885)		
			Rs = 3185/-			1/7/2007	R. Khan	
			Rs = 3375/-			1/12/2007	R. Khan	
			Rs = 3820 4050/-			1/7/2008	R. Khan	
			Rs = 4050 4280/-			1/12/2008	R. Khan	
			Rs = 4510/-			1/12/2009	R. Khan	A. E. Hyderabad

8 Signature of Government Servant	9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the office or other attesting officer	15 Reference to any recorded punishment or censure or praise of the Government Servant.	
					Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
						Period			Government to which debitable
Rehm (7740)	A.E.O. Khyber Pakhtunkhwa	30.6.2007	Revision of pay	A.E.O. Khyber Pakhtunkhwa				Appointed on Contract basis against vacant PTC post in BPS 7 PM plus usual allowances admissible under the rules vide AEO Khyber Agency at Dammard Endist. No 11392-96/Hy; LKL DT, 26/7/2007	
Rehm	A.E.O. Khyber Pakhtunkhwa	30.11.2007	Annual Inc.	A.E.O. Khyber Pakhtunkhwa				Agency Education Officer, Khyber Agency at Dammard Endist. No. 11392-96/Hy; LKL DT, 26/7/2007	
Rehm	A.E.O. Khyber Pakhtunkhwa	30.6.2007	Revision of pay	A.E.O. Khyber Pakhtunkhwa				Allowed BPS 9 (2770-165-772) on passing of F.Sc. Examination in 2nd Division with effect from 1/8/2006 vide AEO Khyber Enst. No 33-37 Dated 2/1/2007	
Rehm (885)	A.E.O. Khyber Pakhtunkhwa	30.11.2007	Annual Inc.	A.E.O. Khyber Pakhtunkhwa				Agency Education Officer, Khyber Agency at Dammard Endist. No. 11392-96/Hy; LKL DT, 26/7/2007	
Rehm	A.E.O. Khyber Pakhtunkhwa	30.6.2008	Revision of pay	A.E.O. Khyber Pakhtunkhwa				T 176 dt 3/2/08 Drawn Rs. 5562/- on pay of staff of pay scale of Rs. 8706 dt 1/08 dt 1/08 dt 1/08	
Rehm	A.E.O. Khyber Pakhtunkhwa	30.11.2009	Annual Inc.	A.E.O. Khyber Pakhtunkhwa					
Rehm	A.E.O. Khyber Pakhtunkhwa	30.11.2009	Annual Inc.	A.E.O. Khyber Pakhtunkhwa					
Rehm	A.E.O. Khyber Pakhtunkhwa	30.11.2010	Annual Inc.	A.E.O. Khyber Pakhtunkhwa					

(39)

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant Signature of the holder or other authority in all cases
P.T.C			RS = 4740/-	R.D.S. 9 (3185-1200-1885)		1 ¹² / ₂₀₁₀	R. Baln A. E. Khyber
do		Revision of pay order	RS, 7720/-	R.D.S. 9 (0200-350-12600)		1 ⁷ / ₂₀₁₁	R. Baln
do			RS 8100/-			1 ¹² / ₂₀₁₁	R. Baln
do			RS 8480/-			1 ¹² / ₂₀₁₂	R. Baln

8 Signature of Government Servant	9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure or praise of the Government Servant.
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
						Period		
<i>Rah</i>	A.E.O. Khyber	30/6/2011	R/P/04	A.E.O. Khyber				
<i>Rah</i>	A.E.O. Khyber	30/11/2011	A/902	A.E.O. Khyber				
<i>Rah</i>	A.E.O. Khyber	30/11/2012	A/1012					
<i>Rah</i>								

Sanctioned on the ordinary leave with full pay w.e.f 10.2.2009 To 30.6.2009 (30 days) vide AEO Khyber Agency order No. 3191-93 dt. 08/07/2009.

Agency Education Officer
Khyber Agency at Jamrud.

SERVICE VERIFIED
From 1/7/06 To 30/11/2011
As per Bill & other records
of this Office

Agency Education Officer
Khyber Agency at Jamrud



District Education Office (Male)
District Khyber

No.
Dated:

41

RE-DEPLOYMENT ORDER

The undersigned is pleased to redeploy Mr. Tajir Khan PSHT
GPS Badshahmir Killi LKL to GPS Zin Tara Landi Kotal in his own pay and scale with
immediate effect in the interest of public service.

Nisar Muhammad
District Education Officer (Male)
District Khyber

Order No. 853-58

Dated: 10/02/2022

- 01 Director E & SE Khyber Pakhtunkhwa at Peshawar.
- 02 Deputy Commissioner District Khyber at Jamrud.
- 03 District Monitoring Officer Education District Khyber.
- 04 SDEO Landi Kotal.
- 05 Individual concerned.
- 06 Office Copy.


District Education Officer (Male)
District Khyber

10/02/22

(42)



OFFICE OF THE DISTRICT EDUCATION OFFICER KHYBER
Email: DEOKHYBER7777@gmail.com

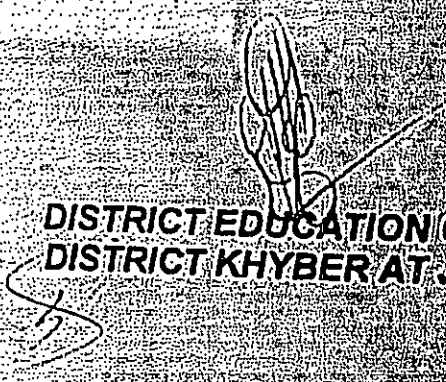
CANCELLATION OF REDEPLOYMENT ORDER

The redeployment order early issued in respect of Mr. Tajar Khan PSHT from GPS Badshah Mir Killi BZK Landi Kotal to GPS Zintara Landi Kotal is hereby cancelled with immediate effect and directed to report to GPS Badshah Mir Killi BZK in the interest of public.

Endst: No. 4197-4202

(MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD
Dated 10/05/2013

- Copy of the above is forwarded to the;
1. Director Elementary & S.E.D Khyber Pakhtunkhawa.
 2. Deputy Commissioner Khyber at Peshawar House.
 3. SDEO Concerned.
 4. ADEO Primary Local Office.
 5. Official Concerned.
 6. Office Copy.


DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Dist. Govt. KP-Provincial
District Accounts Office khyber
Monthly Salary Statement (May-2023)

43



Personal Information of Mr TAJIR KHAN d/w/s of TAUKAL KHAN

Personnel Number: 00423518 CNIC: 2120374404603
Date of Birth: 12.01.1982 Entry into Govt. Service: 01.08.2006

NTN:
Length of Service: 16 Years 10 Months 001 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH 81209659-DISTRICT GOVERNMENT KHYBE

DDO Code: KH6104-Govt Primary Schools (Female) Landi Kotal Khyber

Payroll Section: 001 GPF Section: 001 Cash Center: 17

GPF A/C No: GPF Interest Free GPF Balance: 653,790.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15 Pay Stage: 12

Wage type		Amount	Wage type		Amount
0001	Basic Pay	47,680.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	1,500.00	2148	15% Adhoc Relief All-2013	837.00
2199	Adhoc Relief Allow @10%	419.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2022KP	4,612.00	2347	Adhoc Rel Al 15% 22(PS17)	4,613.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-180.00
3609	Income Tax	-389.00	3990	Emp.Edu. Fund KPK	-135.00
4004	R. Benefits & Death Comp:	-600.00	4200	Professional Tax	-1,200.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	234,000.00	-7,800.00	179,400.00

Deductions - Income Tax

Payable: 5,981.99 Recovered till MAY-2023: 4,098.00 Exempted: 1495.21 Recoverable: 388.78

Gross Pay (Rs.): 70,765.00 Deductions: (Rs.): -14,594.00 Net Pay: (Rs.): 56,171.00

Payee Name: TAJIR KHAN

Account Number: 01010008404002

Bank Details: THE BANK OF KHYBER, 080101 HAYATABAD BRANCH HAYATABAD BRANCH, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: Domicile:- Housing Status: UNKNOWN

Temp. Address:

City: Email: tajirkhan35@gmail.com

System generated document in accordance with APPM 4.6.12.9(87176/28.05.2023/v3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/31.05.2023/22:19:59)

49

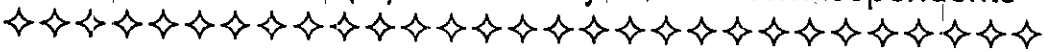
**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

Service Appeal No:- _____ /2023

Mst: Tajir Khan (PSHT TEACHER) Appellant

Versus

District Education Officer (M) Jamrud Khyber others... Respondents

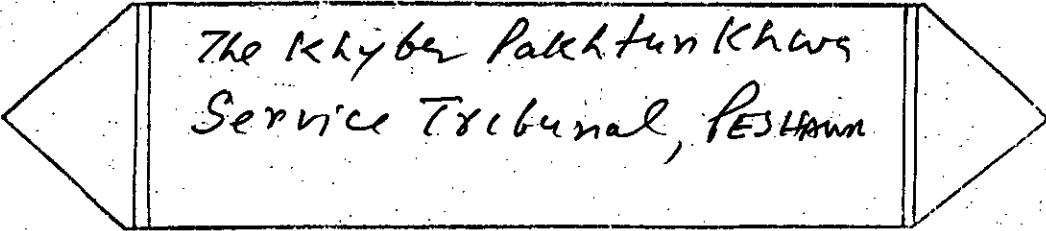


Addresses of Respondents:-

- 1 District Education Officer (Male) E&SE District Khyber at Jamrud.
Sub Division Education Officer Landi katal.
District Account Officer District Khyber
Director Education Elementary & Secondary Education Department GHS
NO. 1 Peshawar city Khyber Pakhtunkhwa, Peshawar.
- Secretary to Government of Khyber Pakhtunkhwa, Elementary &
Secondary Education Department, Civil Secretariat KPK, Peshawar

Nasir ud din Yousaf zai advocate
0300-5958088

بعدالت



بنام
بنام

دفعہ 13-10-2023

Service Appeal
Removal from Service

باعث تحریر آنکہ

امیدیں
بجانب
انہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکن کارروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالت ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جائے التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہوا یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ مندر ہے۔

المرقوم 13/0/2023

2023

Adm

21203-7440460-3
03457156130

مقام کے
امیدیں
بجانب
انہ

BC-151560

2023

21203-7440460-3

03457156130

am 39558