


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Appeal No. 2339 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/11/2023	<p>The appeal of Mst. Shamim Akhtar presented today by Mr. Muhammad Ghazanfar Ali, Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____</p> <p>By the order of Chairman  REGISTRAR</p>

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

In service Appeal No. 2339 /2023

**Shamim Akhtar**  
**(Appellant)**

**VERSUS**

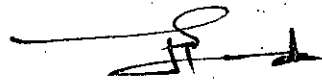
**Govt. of KPK etc**  
**(Respondents)**

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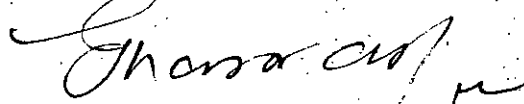
S. No.	Particulars of documents	Annexure	Page
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Dated: 14 /11/2023

**Humble Appellant**



**Shamim Akhtar**  
Through Counsel



**Muhammad Ghazanfar Ali**  
Advocate High Court

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

Service Appeal No. 2389 /2023

**Mst. Shamim Akhtar** wife of Muhammad Tahir Khan  
resident of Dera Ismail Khan presently serving as SDEO (F)  
Daraban, District Dera Ismail Khan

..... **Petitioner**

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa through Secretary Education Department KPK Peshawar.
2. The Secretary Education Department Khyber Pakhtunkhwa Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer (Female) Dera Ismail Khan.
5. District Accounts Officer, Dera Ismail Khan.
6. **Mst. Noor Khadija** serving as SDEO (F) Wana South Waziristan.

..... **Respondents**

**APPEAL UNDER SECTION 4 OF THE KPK SERVICES**  
**TRIBUNAL ACT, 1974 AGAINST THE POLITICAL BASED**  
**POSTING TRANSFER NOTIFICATION#SO(MC) E&SED/4-**  
**16/2023 DATED 26/05/2023 VIDE WHICH THE**  
**APPELLANT IS TRANSFERRED FROM SDEO (FEMALE)**  
**DARABAN TO SDEO (F) JANDOLA DISTRICT TANK.**

**PRAYER**

On acceptance of this service appeal the impugned transfer order No. SO(MC)E&SED/4-16/2023 dated 26/05/2023 may kindly be set aside. Similarly any other order, if issued by the respondents upon the departmental appeal of appellant may also be set aside.

Any other relief deemed appropriate in the given circumstances may also be granted to the appellant in the large interest of justice.

**Note:** Addresses given above shall suffice the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

**Respectfully Sheweth;**

The appellant humbly submits as under;

1. That appellant has been serving the Elementary & Secondary Education Department Khyber Pakhtunkhwa as SDEO (Female) and always performed her duties with zeal, zest and to the entire satisfaction of her superior and did not leave any stone unturned towards her high ups. In this respect service record of appellant is very much evident.
2. That appellant was transferred to Samar Bagh (Khall Dir lower) vide notification No. SO(SM)E&SED/3-2/2018 dated 21/02/2019 and thereafter transferred from Khall Dir lower to SDEO (F) Kakki Bannu vide notification No. SO(SM)E&SED/3-2/2018 dated 05/03/2019 and the appellant despite of lady, performed her duties in far-flung areas of the province as per wishes of her high-ups.
3. That the appellant was transfer from SDEO Kakki Bannu to SDEO Parova Dera Ismail Khan vide notification No. SO(MC)E&SED/4-16/2022 dated 10/11/2022. Appellant was

*Ghanshyam*

performing her duties as SDEO (F) Parova with zeal, zest and to the entire satisfaction of her superiors but ironically the appellant was once again transferred from SDEO (F) Parova to SDEO (F) Daraban District Dera Ismail Khan vide office order No. SO(MC)E&SED/4-16/2022 dated 20/12/2022 on the basis of political victimization and the private respondent#4 is posted against the post of appellant. Copy of the transfer order dated 20/12/2022 is annexed as **Annexure-A**.

4. That the respondents once again transferred the appellant from SDEO (F) Daraban District Dera Ismail Khan to SDEO (F) Jandola District Tank vide impugned transfer order No. SO(MC)E&SED/4-16/2023 dated 26/05/2023 without any lawful justification. Copy of the impugned order dated 26/05/2023 is annexed as **Annexure-B**.

5. That appellant preferred a departmental appeal/representation duly forwarded to the respondent#2 on 14/07/2023 which is still pending for decision. Although 90 days has been lapsed but the departmental appeal is not been decided as yet, which also shows mala-fide on the part of respondents. Copies of the departmental appeal along with postal receipt are annexed as **Annexure-C & D**

6. That feeling aggrieved by the impugned transfer order dated 26/05/2023, the appellant does not have any other efficacious remedy but to invoke the appellate jurisdiction of this Honourable Tribunal, by way of instant appeal, on inter alia the following grounds:-

**GROUND:-**

A. That the impugned transfer orders dated 26/05/2023 is premature, illegal, against service laws and policy, hence, liable to be cancelled.

- B. That it is humanly impossible for a woman in the milieu of Pakistani society to look after her family and carry out her professional obligations at the same time under such circumstances.
- C. That the impugned transfer order is based on political influence, hence, not sustainable in the eyes of law as well as service policy.
- D. That as per policy the posting tenure is minimum three years but in the instant case the appellant is transferred only after few months which clearly reveals that the appellant is politically victimized.
- E. That the appellant diligently served in far-flung areas of the province, she has undoubtedly proven her dedication and competence. However, Jandola District Tank presents a unique set of challenges, particularly for a woman from a settled area because the security situation in Jandola District Tank, being a war-affected tribal area, is undeniably precarious. It is crucial to consider the safety and well-being of personnel, especially when their deployment may pose a potential risk to their security. Appellant is not only an experienced and competent professional but is also an eastern woman, which adds an additional layer of complexity to her posting in such a challenging environment. Hence, on this sole ground the impugned transfer order is liable to be cancelled.
- F. That appellant requests the reconsideration of the impugned transfer order and the cancellation of the same. It is not my intention to undermine the importance of equitable distribution of resources and personnel, but rather to highlight the unique circumstances that may jeopardize her safety and effectiveness in this particular posting.

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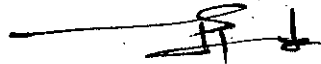
G. That the impugned transfer notification dated 26/05/2023 is against law and facts. Moreover, the impugned transfer order has been issued just after few months of previous transfer which is pre-mature and on the basis of political influence, hence, on this sole ground, the impugned transfer order is liable to be set aside.

H. That Counsel for the appellant may please be allowed to raise additional grounds during the course of arguments.

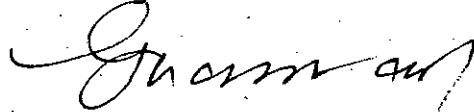
**It is therefore respectfully prayed that the instant appeal may please be accepted as prayed for in the headnote and contents of appeal.**

Dated: 14/11/2023

**Humble Appellant**



**Shamim Akhtar**  
Through Counsel



**Muhammad Ghazanfar Ali**  
Advocate High Court

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

In service Appeal No. \_\_\_\_\_/2023

**Shamim Akhtar**  
**(Appellant)**

**VERSUS**

**GOVT of KPK etc**  
**(Respondents)**

**CERTIFICATE**

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Court.

Dated \_\_\_/11/2023

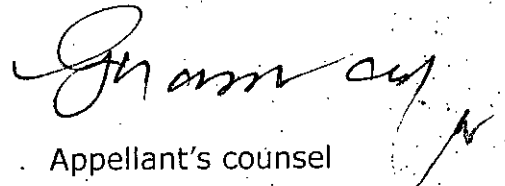


Appellant

**NOTE:**

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

Dated \_\_\_/11/2023



Appellant's counsel



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

In service Appeal No. \_\_\_\_\_/2023

**Shamim Akhtar**  
**(Appellant)**

**VERSUS**

**GOVT of KPK etc**  
**(Respondents)**

**AFFIDAVIT**

I, **Shamim Akhtar**, the appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following my instructions;
2. That all parawise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

Dated 14/11/2023

  
**Deponent**

Identified By:-

  
**Muhammad Ghazanfar Ali**  
Advocate High Court

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

CM No. \_\_\_\_\_/2023

In service Appeal No. \_\_\_\_\_/2023

**Shamim Akhtar                      VERSUS                      Govt. of KPK etc**

**APPLICATION FOR INTERIM RELIEF BY SUSPENDING THE**  
**OPERATION OF IMPUGNED TRANSFER ORDER DATED**  
**26/05/2023 TILL FINAL DECISION OF THE INSTANT**  
**SERVICE APPEAL.**

**Respectfully Sheweth,**

1. That the above titled service appeal is being filed before this Honourable Tribunal and the instant application may kindly be considered as part of it.
2. That the appellant has prima facie case and balance of convenience is also tilts in favour of the appellant.
3. That the respondents are intending to transfer the appellant to Jandola District Tank on political victimization and if the operation of impugned transfer order is not suspended then the appellant will face irreparable loss and instant appeal will become futile.
4. That this honourable tribunal has got vast and ample powers to entertain the application in hand.

**It is, therefore, humbly requested that in view of the above submissions, the interim relief may kindly be issued in favour of appellant till the final decision of the instant service appeal.**

Dated: \_\_\_\_/11/2023

**Humble Appellant**

**Shamim Akhtar**  
*Through Counsel*

**Muhammad Ghazanfar Ali**  
Advocate High Court

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

In service Appeal No. \_\_\_\_\_/2023

**Shamim Akhtar**  
**(Appellant)**

**VERSUS**

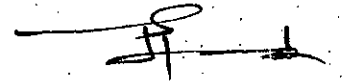
Govt of KPK etc  
**(Respondents)**

**AFFIDAVIT**

I, **Shamim Akhtar**, the appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying CM petition has been drafted by counsel following my instructions;
2. That all parawise contents of the CM petition are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

Dated 14/11/2023



**Deponent**

Identified By:-



**Muhammad Ghazanfar Ali**  
Advocate High Court

BETTER COPY

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

NOTIFICATION

Dated: 20<sup>th</sup> December, 2022

No 50 (MC) E&SED/4-16/2022/Posting /transfer/MC/: The following posting/transfer are here by ordered with immediate effect, in the best public interest:-

Sr.No	Name of officer	From	To	Remarks
1	Mst. Shamim akhter MC BS-17	SDEO Parova D.I.Khna	SDEO (Female) Daraband D.I.Khan	
2	Mst. Nighat Shaheen	SDEO (Female) Kakki Bannu	SDEO Parova D.I.Khan	Vice S.No 1

2. The above posting/transfer will take effect from the promotion of the present incumbent to deputy DEO (Female BS 18).

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of ecen No& date:

Copy forwarded for information to the:

1. Accountant general Khyber pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District education officers (Female) Bannu D.I. Khan.
5. District accounts officers bannu D.I.Khan.
6. PS to minister E&SE Khyber pakhtunkhwa.
7. PS to secretary, E&SE department Khyber pakhtunkhwa.
8. Master file

NASEER ABBA KHALIL  
SECTION OFFICER (MANAGEMENT)

*Alexeel  
Ghannayy*

11

12

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Date: 30/12/2022

NOTIFICATION

NO. SD/MS/ES/E/14-10/2022/Promotion/Transfer/C/ The following posts have been

No.	Name of officer	From	To	Remarks
1	Mrs. Shamim Akhtar M. (S-17)	SD/O Parova D.I. Khan	SD/O (Female) Karaband D.I. Khan	
2	Mrs. Nighat Shahzad M. (S-17)	SD/O (Female) Kakki Bazar	SD/O Parova D.I. Khan	

The above posts/transfer will take effect from the promotion/transfer of the Deputy D/O (Female) (S-10)

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Encls. of even No. & date:

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar
- 2. Director, ESSE Khyber Pakhtunkhwa, Peshawar
- 3. Director, FMIS, ESSE Department with the request to upload the list of officers of the department
- 4. District Education Officers (Female) Bannu/D.I. Khan
- 5. District Accounts Officers, Bannu/D.I. Khan
- 6. PS to Minister, ESSE Khyber Pakhtunkhwa
- 7. PS to Secretary, ESSE Department, Khyber Pakhtunkhwa
- 8. Master file

*Attested  
Ghannam*

*Nawaz*  
12/12/22  
INASEER ABBAS KHAN  
SECTION OFFICER



13  
13

Date: Peshawar 10<sup>th</sup> November, 2022

**NOTIFICATION**

NO.SO(MCIE&SED/4-16/2022/Posting/Transfer/MC): The following posting/ transfer are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name of officer	From	To	Remarks
1	Mat. Shamim Akhtar MC BS-17	SDEO Kakki Bannu	SDEO Parova D.I Khan	Vice S.No.2
2	Mst. Nighat Shaheen MC BS-17	SDEO Parova D.I Khan	SDEO Kakki Bannu	Vice S.No.1

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officers (Female) Bannu D.I Khan
5. District Accounts Officers Bannu D.I Khan
6. PS to Minister E&SE Khyber Pakhtunkhwa
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
8. Master file.

*(Handwritten signature)*  
10.11.22

(NASEER ABBAS KHANIL)  
SECTION OFFICER (Management Cadre)

*(Handwritten signature)*



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-7A Opposite MPYA - District Education Office, Peshawar  
Phone: 091-9222222 Fax: 091-9222222

14  
Annexure  
"B"

**NOTIFICATION**

NO. SO(MC)E&SE/4-16/2023/Posting Transfer/MS/DRG  
transfers are hereby ordered with immediate effect in the list published below.

Sr. No	Name & Designation	From	To	Remarks
1	Sandaa Shahbaz MC BS-17	SDE O Female Jandala Tank	SDE O Female Fabarpur D.I Khan	
2	Shamshad Bibi MC BS-17	SDE O Female Fabarpur D.I Khan	MCSE D.I Khan	
3	Noor Khadija MC BS-17	SDE O (Female) Wana, South Waziristan	MCSE D.I Khan	
4	Shamim Akhtar MC BS-17	SDEO (Female) Daraband Kalan D.I Khan	SDEO Female Jandala Tank	

2. No TA/DA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No. & date:**

Copy forwarded for information to the -

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the name on the website of the department
4. District Education Officer (Female) D.I Khan
5. District Accounts Officers D.I Khan.
6. PS to Advisor to Chief Minister on E&SE Khyber Pakhtunkhwa
7. PS to Secretary, E&SE Department Khyber Pakhtunkhwa

26-5-2023  
IMRAN ZAMAN  
SECTION OFFICER (Management Cadre)

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block A Opposite MPAs Hostel Civil Secretariat Peshawar  
Phone 091-9210626

Dated 26<sup>th</sup> May 2023

NOTIFICATION

NO. SO (MC) E&SED/4-16/2023/posting/Transfer/MC/DIR: The following postings/transfer are hereby ordered with immediate effect in the best public interest.

S NO	Name & designation	From	To	Remarks
1.	Samina Shahnaz MC BS-17	SDEO Female Jandola Tank	SDEO Female Paharpur	V.S No.2
2.	Shamshad Bibi MC BS-17	SDEO Female Paharpur DI Khan	Report to Directorate of E&SE	
3.	Noor Khudija MC BS-17	SDEO (Female) Wana South Waziristan	SDEO Female Daraband Kalan D.I Khan	V/S No 4
4.	Shamim Akhtar MC BS-17	SDEO (Female) Daraband Kalan D.I Khan	SDEO Female Jandola Tank	V.S No. 1

2. No TA/DA is allowed

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst of even No & date

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE, Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officer, (Female) D.I Khan.
5. District Accounts Officers, D.I Khan.
6. PS to Advisor to Chief Minister on E&SE, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.

IMRAN ZAMAN  
SECTION OFFICER (Management Cadre)



15

Annexure  
"C"

OFFICE OF THE  
DIRECTOR GENERAL  
OF  
PUNJAB  
LAW ENFORCEMENT  
DEPARTMENT  
LUDHIANA

3. That the appellant was performing her duties with zeal, zest and diligence and to the satisfaction of her superiors.
4. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
5. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
6. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
7. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
8. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
9. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
10. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
11. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
12. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
13. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
14. That the appellant was transferred from SDEO (Female), Paroo, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 to SDEO (Female), Kakkil Bannu, Distt; D. Khan vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022. She was performing her duties in the said post to the satisfaction of her superiors. Copy is annexed for ready reference.
15. That it is pertinent to mention here that one SDEO was transferred from SDEO (F) paroo to SDEO (Female), Kakkil Bannu vide notification No. SO(MC) E&SED/4-16/2022 dated 10/11/2022 but she did not obey the transfer order. That it is also pertinent to mention here that no seat of SDEO (Female), is



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To

The Secretary  
Elementary and Secondary Education Department  
Khyber Pakhtunkhwa

Through Proper channel

**SUBJECT:- DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE POLITICAL BASED POSITNG TRANSFER NOTIFICATION # SO (M) E&SED/4-16-2023 DATED 26<sup>TH</sup> MAY 2023 VIDE WHICH THE APPELLANT IS TRANSFERRED FROM SDEO FEMALE DARABAN KALAN DISTRICT DI KHAN TO SDEO FEMALE JANDOLA SOUTHW WAZIRISTAN.**

**Respected Sir**

Appellant humbly submits as under:-

1. That the appellant has been serving the E&SE Department Khyber Pakhtunkhwa as SDEO (Female) and always performed her duties with zeal and zest any stone unturned is very much evident.
2. That the appellant was transferred samar Bagh (Dir Lower) vide notification No. SOM E&SED/3-2/2018 dated 21.02.2019 and therefore transferred from Dir Lower to SDEO Female Kakki Bannu vide notification No SOMC E&SED/3-2/2018 dated 05.03.2019 and the appellant despite of lady performed her duties in the far-flange areas of the province as per wises of her higher. (Copies annexed for ready references).
3. That the appellant was transferred from SDEO (Female) Kakki Bannu to SDEO Paroa D.I Khan vide.notification No SOMC E&SED 4-16/2022 dated 10.11.2022.
4. That the appellant was performing her duties as SDEO (Female) Paroa with zeal and zest and to the entire satisfaction of her from SDEO Female paroa to transferred to SDEO (Female) Paroa to transferred SDEO Female Draban Kalla District DI Khan vide Office Order No. SO MC E&SED/4-16/2022 dated 20.12.2022 on the basis of political victimization.

5. That it is pertinent to mention that one SDEO was transferred from SDEO Paroa to SDEO Kakki Bannu vide notification No.SOMC E&SED/4-16/2022 dated 10.11.2022 but she did not obey the transfer order that it also pertinent to mention here that seat SDEO Female lying vacant in Tehsil Draban Kalla but the impugned transfer order is based on political influence hence not sustainable in the eye of law as well as service policy.
6. That it is stated to your kind owner that I could not complete my normal tenure to here and transferred to Sub Division Draban Kalla District DI Khan to Sub Division Jandola, South Waziristan once again remote area exit after four month without completion tenure.
7. That it is lodged appeal to your good office due response is awaited that in the meanwhile file service appeal before service tribunal, vide case No 802/2023 dated April 2023 case is under trail against the impugned transfer order arc dated 26.06.2023 is liable to be set aside.
8. That is good self has got vest power to accept the departmental appeal.

It is therefore most humbly requested that the impugned transfer order SOMS E&SED 4-16/2023 dated 26<sup>th</sup> May 2023 may kindly be set aside.

Mst Shamim Akhtar  
SDEO (Female), Daraban Kalan  
District DI Khan

Copies in advance to:-

1. The Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

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