



30.11.2017

Appellant in person present. Mr. Farhaj Sikandar, District Attorney for the respondents also present. Written reply on behalf of respondents not submitted. Learned District Attorney requested for further adjournment. Adjourned. To come up for written reply/comments on 25.01.2018 before S.B. at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

25.01.2018


None present on behalf of the appellant. Mr. Farhaj Sikandar, District Attorney for the respondents present. Representative of the department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on 15.03.2018 before S.B. at Camp Court D.I.Khan. Notice be also issued to appellant and his counsel for the date fixed.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

15.03.2018

Appellant in person and Mr. Ziaullah, DDA for respondents present. Appellant submitted an application for withdrawal of the instant appeal. In this ^{regard} his signature also obtained on the margin of the order sheet. Application is allowed and the instant appeal is dismissed ~~was~~ withdrawn. File be consigned to the record room.

Announced:
15.03.2018



(AHMAD HASSAN)
MEMBER
Camp Court D.I.Khan

Zehra B. Jinnah
15/3/2018

Service Appeal No. 273/2016

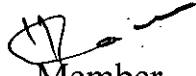
23.08.2017

Appellant in person present. Mr. Farhaj Sikandar, District Attorney for the respondents also present. Written reply on behalf of respondents not submitted despite issuance of notice on previous date. Learned District Attorney is directed to direct the respondents to submit written reply on the next date positively otherwise they will be proceeded ex-parte. Notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on 27.09.2017 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan


27.09.2017

Appellant in person present and Mr. Farhaj Sikandar, District Attorney present. None present on behalf of respondents. Notice be issued to respondent party by warning of attachment salary. To come up for written reply/comments on 30.11.2017 before S.B at Camp Court D.I.Khan.


Member
(Judicial)
Camp Court D.I.Khan


25.01.2017

Appellant in person and Mr. Ghulam Muhammad, AADO alongwith Mr. Farhaj Sikandar, Government Pleader for respondents present. Written reply not submitted. Respondents are directed to positively submit written reply otherwise all the official respondents would be called in person. To come up for written reply/comments positively on 29.03.2017 before S.B at Camp Court D.I.Khan.


ASHFAQUE TAJ
MEMBER
Camp Court D.I.Khan


29.03.2017

Tour is hereby cancelled. Therefore, the case is adjourned to 26.07.2017 for the same


Reader

26.07.2017

Appellant alongwith his counsel present. Mr. Farhaj Sikandar, District Attorney for the respondents also present. Representatives of respondent-department are not in attendance, therefore, fresh notice be issued to respondents with the direction to direct the representative to attend the court and submit written reply on the next date by way of last chance. Adjourned. To come up for written reply/comments on 23.08.2017 before S.B at Camp Court D.I.Khan.


(Muhammad/Amin Khan Kundi)
Member
Camp Court D.I. Khan

25.07.2016

Tour programme of D.I. Khan scheduled for 25.07.2016 and 26.7.2016 is hereby cancelled, therefore the case is adjourned to 27.9.16 for written reply/comments. Parties be informed accordingly.



Member

Camp Court D.I.Khan

27.09.2016

Counsel for the appellant and Mr. Farhaj Sikander, Government Pleader present. Representative of the respondent-department is not in attendance, therefore, fresh notice be issued to the respondents for written reply/comments for 27.12.2016 before S.B at Camp Court D.I.Khan.

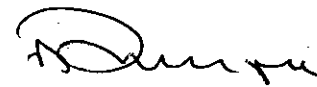


Member

Camp Court D.I.Khan

27.12.2016

Appellant in person and Mr. Ghulam Muhammad, Education Officer alongwith Mr. Farhaj Sikandar, Government Pleader for the respondents present. Written reply by respondents not submitted. Representative of the respondent-department requested for further time for filing of written reply. To come up for written reply/comments on 25.01.2017 before S.B at Camp Court D.I.Khan.



ASHFAQUE TAJ

MEMBER

Camp Court D.I.Khan

25.4.2016

Counsel for the appellant present. Learned counsel for appellant argued that the appellant was serving as C.T when dis-appeared in the year, 2008 and on that account removed from service vide impugned order dated 12.12.2009. That since the appellant was not traceable as such his brother preferred different applications including departmental appeal dated 13.12.2009. That the appellant was lateron released by the security agencies on 25.12.2013 and was not in a position to maintain himself both physically and mentally. That on gaining his, senses the appellant preferred departmental appeal on 28.12.2015 which was not responded and hence the instant service appeal on 21.3.2016.

That the absence of the appellant was not willful but was due to forced dis-appearance being in custody of security agencies and as such the impugned order is not maintainable.

Points urged need consideration. Admit subject to limitation. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments on 25.07.2016 before S.B at camp court, D.I.Khan.

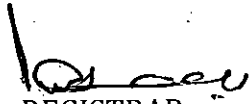



Appellant Deposited
Security & Process Fee


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 273/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	22.03.2016	<p>The appeal of Mr. Jehanzeb Khan resubmitted today by Mr. Amin-Ur-Rehman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	24.3.16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>29-3-16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	29.03.2016	<p>Counsel for the appellant present. Seeks Adjournment. Adjourned to 13.4.2016 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>
	13.4.2016	<p>Appellant present in person. Seeks adjournment as his counsel is not in attendance. Adjourned for preliminary hearing to 25.4.2016 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Jahanzeb Khan son of Muhammad Shah R/O Umer Khel Tehsil Jandolla FR Tank received to-day i.e. on 21.03.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The authority to whom the departmental appeal was preferred/made has not been arrayed a necessary party.
- 2- Annexures of the appeal may be flagged.

No. 476 /S.T.

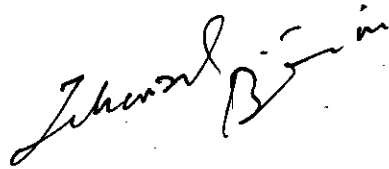
Dt. 22/3/2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amin-Ur-Rehman Adv. Pesh.

Sir,

Resubmitted after completion-



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 273/2016

Jehanzeb Khan..... **APPELLANT**

...**VERSUS**...

Additional Chief Secretary (FATA) & others **RESPONDENTS**

I N D E X


S.No.	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1	Service Appeal		1-6
2	Affidavit		7
3	Addresses of the Parties		8
4	Copy of the educational testimonials, training certificates alongwith appointment order	"A"	9-28
5	Copies of Hajj Proof and Newspaper Clippings	"B"	29-43
6	Copy of the impugned order dated: 12.12.2009 alongwith departmental appeal and misc documents/ applications	"C"	44-77
7	Wakalatnama		78


APPELLANT

THROUGH


AMIN-UR-REHMAN

&


KASHIF SHAHBAZ KHAN
ADVOCATES, PESHAWAR
3-A, PARK AVENUE, BETTANI PLAZA,
UNIVERSITY TOWN, PESHAWAR
CELL NO.0321-9022964

DATED: 19.03.2016

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 273 /2016

Jehanzeb Khan S/o Muhammad Shah.
R/o Village Umar Khel, Tehsil Jandola, FR Tank (FATA). **APPELLANT**

...VERSUS...

1. Additional Chief Secretary (FATA),
FATA Secretariat, Warsak Road, Peshawar
2. Director Education (FATA),
FATA Secretariat, Warsak Road, Peshawar
3. Agency Education Officer, F.R Tank at D.I.Khan.
4. Principal Government High School Jandola, F.R Tank. . . **RESPONDENTS**

M.W.F. Province
Service Tribunal
Diary No. 254
Dated 21-03-2016

SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AND ALL ENABLING PROVISIONS OF GOVERNING THE SUBJECT, AGAINST OFFICE ORDER NO.0587-92, DATED 12.12.2009 ISSUED BY RESPONDENT NO.3, VIDE WHICH MAJOR PENALTY OF REMOVAL FROM SERVICE HAS UNILATERALLY BEEN IMPOSED.

PRAYER: On acceptance of instant service appeal, impugned office order No. 0587-92, dated 12.12.2009 of respondent No.3, may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence be set at naught and appellant may be re-instated in service, from the date of his removal from service, with all back benefits, so as to secure the ends of justice.

Handwritten signature and date
21/3/16

Re-submitted to ~~date~~

and filed

Handwritten signature and date
22/3/16

Yusufzai Law Chamber

Respectfully Sheweth:

1. That appellant is bonafide resident of FR Tank (FATA) and was appointed as Certified Teacher (CT BPS-14) under the education directorate FATA, vide appointment order No.14887-98, dated 27.05.1993, on the strength of B.Sc qualification and obtaining the mandatory training certificate from Govt. in Service Teachers training College, Jamrud Khyber Agency, in the year 1991-92 and, after medical examination, joined his service and was performing duties with zeal/devotion and utmost satisfaction of the superiors.

(COPY OF EDUCATIONAL TESTIMONIALS, TRAINING CERTIFICATES ALONGWITH APPOINTMENT ORDER IS ATTACHED AS ANNEXURE "A").

2. That appellant was performing duties regularly, however, due to military operation against the outlaws in FATA, his school of duty was unwillingly closed for all type of students affairs, rather the school building was occupied by the military personnel and there was no devised mechanism as to how & to whom, such like government servants would mark their attendance, furthermore, appellant alongwith his mother, Mst. Khani Gula (widow), applied for Hajj, in July 2007, in pursuance of approval of the Hajj Department, proceeded for performing Hajj in December, 2007, however, on arrival back from Hajj was intercepted on Quaid-e-Azam International Airport Karachi by the security agencies on 20.01.2008 and shifted to unknown place, without informing/ furnishing grounds of such arrest.

(COPIES OF HAJJ PROOF AND NEWSPAPER CLIPPINGS ARE ATTACHED AS ANNEXURE "B").

3. That family of appellant, particularly old aged ailed mother, exhausted all possible efforts for his safe recovery, but failed, eventually, she died in the year 2013 due to shock sustained by her at the time of forced disappearance of appellant, however released on 25.12.2013 by the security agencies, after conducting detail investigation/ JIT.

4. That appellant, after release from the clutches of security agencies, was badly hit by starvation during custody of security personnel and was hospitalized just after his release and was struggling to come back in life, eventually though survived but took sufficient time to come to the normal life. However, shocked to know that the competent authority has issued the impugned order dated: 12.12.2009 unilaterally and without due process and was refused entry in his parent department which resulted into to departmental appeal dated: 28.12.2015 but has not so far been materialized/ considered, reasons best known to the authority. (COPY OF IMPUGNED ORDER DATED: 12.12.2009 ALONGWITH DEPARTMENTAL APPEAL IS ATTACHED AS ANNEXURE "C").
5. That appellant being aggrieved of his removal from service vide order dated: 12.12.2009, without just cause/ reason and due process, hence approaches this Hon'ble Tribunal inter alia on the following grounds:

GROUND:

- A. That appellant has not been treated in accordance with law and not extended equal protection of law rather subjected to highhandedness and extreme humiliation without just cause and reason and mere on the basis of presumptions, ended into his innocence, he has been shunt out from service without care and caution of its legal consequences, which has pushed appellant and his family into the mouth of endless agonies, hence indulgence of this Hon'ble Tribunal is eminent, in order to issue appropriate directions to the respondents for his re-instatement alongwith all back benefits, so as to secure the ends of justice.
- B. That appellant performed duties regularly with the utmost satisfaction of the authorities and never been provided single opportunity either to the official authorities or students and their parents, with regard to his professional duties, however the sole reason of his removal from service is the forced disappearance of appellant, which was beyond his control and occasioned

inadvertently, moreso, the departmental authorities were very much in knowledge of the incident of his disappearance at the hands of security agencies and the authorities always assured his safe return to his family, but acted otherwise and passed the impugned order in surmises and conjectures, which has caused grave miscarriage of justice.

C. That the impugned order is based on erroneous proceedings carried out by the respondents unilaterally and in utter disregard to the law/rules governing the subject and was shun tout from service with a single stroke of pen, without care and caution of its legal consequences, rather the authority did not bother to either serve upon him mandatory show cause notice, or to conduct full-fledged inquiry into his alleged guilt & has been condemned unheard, which attracts principal of AUDI ALTERIM PATRAM. Reliance is placed on full court judgment of the Apex Court, comprising of 14 Hon'ble Judges of the Apex Court of Pakistan, in case titled, "Justice Khursheed Anwar Bhinder vs. Federation of Pakistan".

D. That appellant and his family, during the period of his forced detention, were required to be provided all type of assistance by the departmental authorities, though apparently they given impression, but acted otherwise, wherefrom extreme malafide on their part could easily be adjudged, furthermore, appellant, after his release from the clutches of security agencies, exhausted all efforts, but his cries felt to deaf ear and instead to provide him opportunity of hearing and to treat his case at the touchstone of Article 10A of the Constitution of Pakistan, 1973, however, deliberately the normal course of law has been deviated by the concerned quarters, hence arrived at a wrong conclusion.

E. That major penalty of removal from service could only be imposed in exceptional circumstances and requires thorough probe/inquiry, including recording of evidence and providing opportunity to appellant to cross them examine and the law/ rules has laid down

a proper mechanism for recording such like evidence and prior to take the same into consideration, appellant should have been confronted with the same, which has deliberately been skipped by the authority, reasons best known to it, hence, on this score alone, appellant is entitled to be re-instated in service with all back benefits, so as to survive honorably.

F. That appellant is the sole breadwinner of the entire family, consisting of four daughters and two minor sons, however, not able to continue their studies due to meager financial resources, which attracts jurisdiction of this Honourable Tribunal to intervene into the matter and declare the impugned proceedings as coram-non-judice and without lawful authority, so as to rescue him as well as his entire family from absolute deterioration, protected under Article 35 of the Constitution of Pakistan, 1973.

G. That appellant was a missing person and was almost out of the scene for all practical purposes, neither he was allowed to meet with any human being, what to say about family members, nor he was free in his movements, rather curtailed him in the lockup, sizing 3' x 3', which directly affected his physical condition and after his release from their clutches, he was unable to walk and was suffering from serious complicated diseases and huge finances are required for his proper medication and the only source was his service on the hope whereof his family was surviving, but his service has also been terminated by the competent authority, in utter disregard to the law/ rules governing the subject and peculiar circumstances of the case, coupled with non-associating appellant with any stage of the impugned proceedings, hence deserves to be extended the relief prayed for in the instant appeal, so as to enable him to survive honorable life and to protect his family from imminent danger at the hands of respondents.

H. That any other ground, with the permission of this Honourable Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant service appeal, impugned office order No.0587-92, dated 12.12.2009 of respondent No.3, may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence be set at naught and appellant may be re-instated in service, from the date of removal from service, with all back benefits, so as to secure the ends of justice.

Any other relief, not specifically prayed for and deemed appropriate to this Hon'ble Tribunal in circumstances of the case may also be granted to the appellant.


APPELLANT

THROUGH

AMIN-UR-REHMAN

&

KASHIF SHAHBAZ KHAN
ADVOCATES, PESHAWAR

DATED: 19.03.2016

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2016

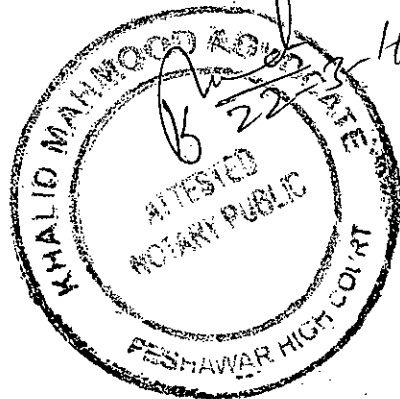
Jehanzeb Khan..... APPELLANT

...VERSUS...

Additional Chief Secretary (FATA) & others RESPONDENTS

AFFIDAVIT

I, Jehanzeb Khan S/o Muhammad Shah R/o Village Umar Khel, Tehsil Jandola, FR Tank (FATA), 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.



Jehanzeb Khan
B. J. Khan

DEPONENT

22601-2592674-9

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2016

Jehanzeb Khan..... APPELLANT

...VERSUS...

Additional Chief Secretary (FATA) & others RESPONDENTS

ADDRESSES OF THE PARTIES

APPELLANT:

Jehanzeb Khan S/o Muhammad Shah
R/o Village Umar Khel, Tehsil Jandola, FR Tank (FATA).

RESPONDENTS:

1. Additional Chief Secretary (FATA),
FATA Secretariat, Warsak Road, Peshawar.
2. Director Education (FATA),
FATA Secretariat, Warsak Road, Peshawar.
3. Agency Education Officer, F.R D.I.Khan/ Tank.
4. Principal Government High School Jandola.



APPELLANT

THROUGH


AMIN-UR-REHMAN

&


KASHIF SHAHBAZ KHAN
ADVOCATES, PESHAWAR

DATED: 19.03.2016

Annex (A)

9

DOMICILE CERTIFICATE
(For F.R. Personnel)

I, Jahan Zeb S/o Mohd Shah Khan

declare that I was born at Village Jandala Tehsil Jandala
Bhittani section Ummer Khel Dera Ismail Khan, Frontier Region of
parents who are permanently domiciled in the said Special Area.

Signature of the applicant.

Dated 14.9.81

I Malik Adams Khan S/o Kaloor Khan

caste Bhittani sub caste Ummer Khel of village Jandala
of Dera Ismail Khan Frontier Region, hereby certify that the said

Jahan Zeb son of Mohd Shah Khan
claiming membership of Bhittani tribe is a bonafide

member of the said tribe and that he is entitled to the tribal allowances and profits
due to his tribe and bears all losses of his tribe and shares with them the tribal and
territorial responsibilities.

[Handwritten Signature]

Signature of the Malik.

Date 14.9.81

I have satisfied myself from personal knowledge / verification that the
above declaration is true and certify accordingly.

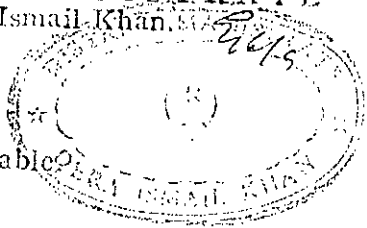
This 14th day of Sep 1981
Political Naib Tehsildar

[Handwritten Signature]
Assistant Political Agent/
Extra Asstt. Commissioner
Frontier Region, D.I. Khan

COUNTERSIGNED

NO 12717/H
07/15/9/81

DISTRICT MAGISTRATE
Dera Ismail Khan



Strike out whichever not applicable

[Handwritten Signature]
ATTESTED

GOVERNMENT DEGREE COLLEGE TANK



Distt: (D.I.Khan)

Provisional Certificate.

Certified that JEHAN ZEB S/O MOHAMMAD SHAH
 Roll No. 3468 ~~1600 of Intermediate and Secondary Education Division~~ / Gomal
 University D.I.Khan Regd: No. 721-T-88
 Passed his BSc Examination of the ~~BKXSB~~ / Gomal University D.I.Khan
 held in (A) 1990 obtaining 326
 marks 2nd Division Division

He also passed in Nil as his additional optional
 Subjects 1. Math -A 2. Math-B 3. Phy: 4. Pak:Stu:5. Isl:Edu:

His conduct during his study at the College was Good

He was a regular student of the Govt:College Tank.

His date of birth according to the College Record is 6-9-70
 (6th Set:NH&saventy)

Station TANK.

Dated 4/5/91 1991

[Signature]
 Principal,
 Govt: Degree College Tank,
 Distt: D.I.Khan
 Govt: College, Tank
 (D.I.Khan.)

[Signature]
ATTESTED

GOMAL UNIVERSITY



DERA ISMAIL KHAN.

DETAILED MARKS CERTIFICATE

Passed/Re-appeared/Failed in Agg/Failed

B.Sc. Examination 1997 Annual/Supplementary/

Roll No. 3468

Term:

Mr./Miss. Jehanzeb

The candidate secured the following marks & has been placed in Second Division

SUBJECTS	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English.	150		
2. A.Course of Mathematics	200	68	Sixty eight ninety five
3. B.Course of Mathematics	200	95	
4. Statistics.	200		
5. Geography.	200		
6. Chemistry.	200		
7. Physics.	200	107	one hundred & seven
8. Botany.	200		
9. Zoology.	200		
10. Pakistan Studies.	40	15	Fifteen
11. Islamic Studies.	60	41	Forty one
TOTAL	700	326	Three hundred & twenty six

THE EXAMINATION WAS TAKEN AS A WHOLE IN PARTS

No. 26446

Dated 23/4/97 19

Controller of Examinations
Gomal University, Dera Ismail Khan

ATTESTED

12

s.No 199593

Roll No. 4540



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION

Pre-Engineering Group

SESSION 1988 (ANNUAL)

THIS IS TO CERTIFY THAT Jehan Zeh Khan

Son/Daughter of Muhammad Shah

and a student of Govt : College Tank

Registered No. 25-B/IK-80 has passed the Intermediate Examination of

the Board of Intermediate & Secondary Education, Peshawar held in July/Aug 1988

as a Regular candidate. He/She obtained 554 Marks out of 1100

and has been placed in Grade C Representing Good

He/She has been awarded Grade C on the basis of internal assessment

by the Institution concerned.

The Examination was taken as a whole

Signature of Asstt. Secretary

Signature and ATTESTED stamp

Signature of Secretary

This certificate is issued without alteration or erasure.

GOVERNMENT DEGREE COLLEGE TANK



Distt: (D.I.Khan)

Provisional Certificate.

Certified that JAHAN ZEB KHAN S/O MUHAMMAD SHAH
Roll No. 4540 Board of Intermediate and Secondary Education Peshawar/~~Govt: D.I. Khan~~

~~Govt: D.I. Khan~~ Regd: No. 25-B/Tk-86
Passed his FSc Examination of the B.I.S.E/~~Govt: D.I. Khan~~
held in ~~2017~~ June 1988 obtaining 22.554/1100
marks 200 Division

He also passed in Nil as his additional optional
Subjects Eng: Urdu Isl:st; Pak-st: Math: Phy: Chem:

His conduct during his study at the College was Good

He was the Regular student of the Govt: College Tank.

His date of birth according to the College Record is 6.9.1970

Station Tank

Dated 19/10/ 88 19

[Signature]
for Principal.
Govt: Degree College Tank,
Distt: D.I.Khan
Principal
College, Tank

[Signature]
ATTESTED

14

BOARD OF
INTERMEDIATE & SECONDARY EDUCATION
PESHAWAR

S.No 035

4540

DETAILED MARKS CERTIFICATE

Intermediate Examination (Pre-Engineering Group)

SESSION 19 88 (Annual/Supplementary)

Name

Jehan Zeb Khan

Father's Name

M. Ghod Khan

Roll No.

4540

COMMUNICATION

SUBJECTS	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1 English	200			76	
2 Urdu	200			101	
3 Islamic Studies	50			53	
4 Pakistan Studies	50				/
5 Mathematics	200			179	
6 Physics	200			79	
7 Chemistry	200			76	
Total	1100			554	

Note: Errors/Omissions excepted.

Date

19

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Prepared by

Checked by

ation of

Aug 1988

10

essment

Asstt. Secretary

Sir

ATTESTED

Secretary

This certificate is issued without alteration or erasure.

S. No 515487

Roll No. 16090

15



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1986 (ANNUAL)

THIS IS TO CERTIFY THAT Jehan Zeb Khan

Son/Daughter of Mohammad Shah

and a student of Govt: High School, Jandola, F.R., D.I.Khan.

has passed the *Secondary School Certificate Examination*

of the Board of Intermediate & Secondary Education, Peshawar held in April 1986 as a

Regular candidate. He/She obtained 447 Marks out of 850

and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|--------------|-----------------|----------------|
| 1. English | 3. Islamiyat | 5. Pak. Studies | 7. Mathematics |
| 2. Urdu | 4. Physics | 6. Chemistry | 8. Biology |

He/She has been awarded Grade E on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is Sixth September
one thousand nine hundred and Seventy Only 6-9-1970

Asst. Secretary

Secretary

This certificate is issued without alteration or erasure

Attested
ATTESTED

16

GOVT: HIGH SCHOOL JANDOLA

F.R.(D.I.KHAN)

ROLL No: 16090

PROVISIONAL CERTIFICATE

Certified that JEHANZEB KHAN ✓

Son of MOHAMMAD SHAH ✓

Roll No 16090 ✓ who appeared from this School at the S. S. C. Annual / Supplementary Examination 1986 has according to the Gazette supplied to me by the Secretary BISE Peshawar been declared successful in the said Examination.

Date of birth (in words and figures) 6-9-1970 ✓

(Sixth Sep: NA of Seventy)

Note:- This certificate is given only with the object of enabling the student to be admitted to a College and is not to be held equivalent to the certificate to be given to him by the Secretary B. I. S. E. Peshawar

GROUP Science

Compulsory Subjects:

Elective Subjects

- 1. English
- 2. Urdu
- 3. Islamiat
- 4. Pak Studies

- 1. Physics
- 2. Chemistry
- 3. Biology
- 4. Math (Elective)

Total Marks 850

Marks obtained 447 Grade: C

Conduct Good

Dated 10.8.1986

Headmaster
Govt: High School
Jandola (F.R.)

10/8
1986

Prepared by :- Shah Mahmood SET 1/C

ATTESTED

17

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(SCIENCE GROUP)
Session 19 80 (Annual/Supplementary)

Name Jehan Zeb
Father's Name Muhammad Shah Roll No. 16090

SUBJECT	Total Number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	62	Sixty two
2. Urdu	150	73	Seventy three
3. Islamiyat	75	47	Forty seven
4. Pakistan Studies	75	43	Forty three
5. Mathematics	100	76	Seventy six
6. Physics	100	53	Fifty three
7. Chemistry	100	37	Thirty seven
8. Biology	100	56	Fifty six
Total	850	447	Four hundred and forty seven

REGISTRATION

SB No. 0140197

Date _____ 19____

[Signature]
Controller of Examination
Board of Intermediate & Secondary Education
PESHAWAR

atics
y

assessment by the Institution concerned.
Date of birth according to admission form is Sixth September
one thousand nine hundred and Seventy Only 6-9-1970)

[Signature]
Asst. Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure

[Signature]
ATTESTED

GOVT. IN SERVICE TEACHERS TRAINING College
Jamrud Khyber Agency

SESSION 19 91-92

Certificate that Mr. Jehan Feb Khan
Son of Mohammad Shah of F.R DIKhan Agency/F. R. as a
C.T. Candidate Appeared, from this College Under.
Roll No. 372 and declared Successfull in the 2nd Division Obtaining 690 (690)
Marks out of 1200

- His date of birth as per Record of this College is sixth of September
one thousand Nine hundred and Seventy
During has stay in this College he enjoyed good moral Character. (6-9-1970)

PREPARED BY [Signature]
CHECKED BY Fazal Buzg

[Signature] 6/12/92
PRINCIPAL
G. In. Services Teachers Training College,
JAMRUD KHYBER, AGENCY.

[Signature]
ATTESTED

18

(19)

DETAIL MARKS CERTIFICATE.

TRAINING CLASSES EXAMINATION C.T. (GENERAL) 1992

Roll No. 372 Name. Uobwjuj Son/Daughter of Caf

Serial No.	SUBJECTS	Max. Marks	Marks Obtained		TOTAL
			Interi.	Exterl.	
1.	Theoary and History of Education	100	52		
2.	Child Development	100	51		
3.	School and Community Development	100	51		
4.	General Methodology and preparation of Teaching Aids.	100	58		
5.	Counselling Testing and Evaluation	100	52		
6.	Organization of Elementary Education of School Management.	100	62		
7.	English	100	52		
8.	Science Maths	100	83		
9.	Social Studies	100	40		
10.	Islamiyat	100	53		
11.	Practice of Teaching	100	131		
G. Total		1200	690		

Passed/Failed

To Re-appear in

Division II

ATTESTED

Prepared by

Checked by

Date of declaration 22/11/92
+ Result

Government Degree College Tank



CHARACTER CERTIFICATE

Name JEHAN ZEB Khan

Father's Name MUHAMMAD SHAH

Father's/Guardian's Address Vill: Jandola Teh: Jandola Distt: DIKhan (FR DIKhan)

Date of 1st Entry in the College 1986 in 1st Year

Date of leaving 1988 in 2nd Year Class

EXAMINATION RECORD

Examination	Year	Division	Subject
1. FSC	1988	2nd Div:	Pre Eng:
2.			
3.			
4.			

Scholarships, Prizes & other Distinctions, etc F.R.S/ship holder

Health and Physical Efficiency *Good*
(D.P.E's Remarks)

Athletics and Sports *Basket Ball*

Hobbies and Social Activities

and other Interest *He took keen interest in reading D. newspaper & Liberty Books*

any office held

Character *Good*

General Remarks *He is a painstaking, co-operative & obedient student during his stay at this college*

Tutor Countersigned

Lecturer in

Date *10-10-88*

No.

[Signature]
ATTESTED

[Signature]
PRINCIPAL
Principal
Government Degree College Tank

23
GOVERNMENT Degree College Tank

21

GOVERNMENT HIGH SCHOOL JANDOLA



JANDOLA (F.R. D.I.K) CHARACTER CERTIFICATE

Certified that Jehanzeb Khan
Son of Moad. Shah
Resident of Village Jandola Distt: FL Mulla
remained on roll of this School w.e.f. 25.8.84 to 31.3.86
During his stay in this School, he bore a good Moral Character.

He took part in Game Foot-ball. The student is an obedient
+ hard-working one.

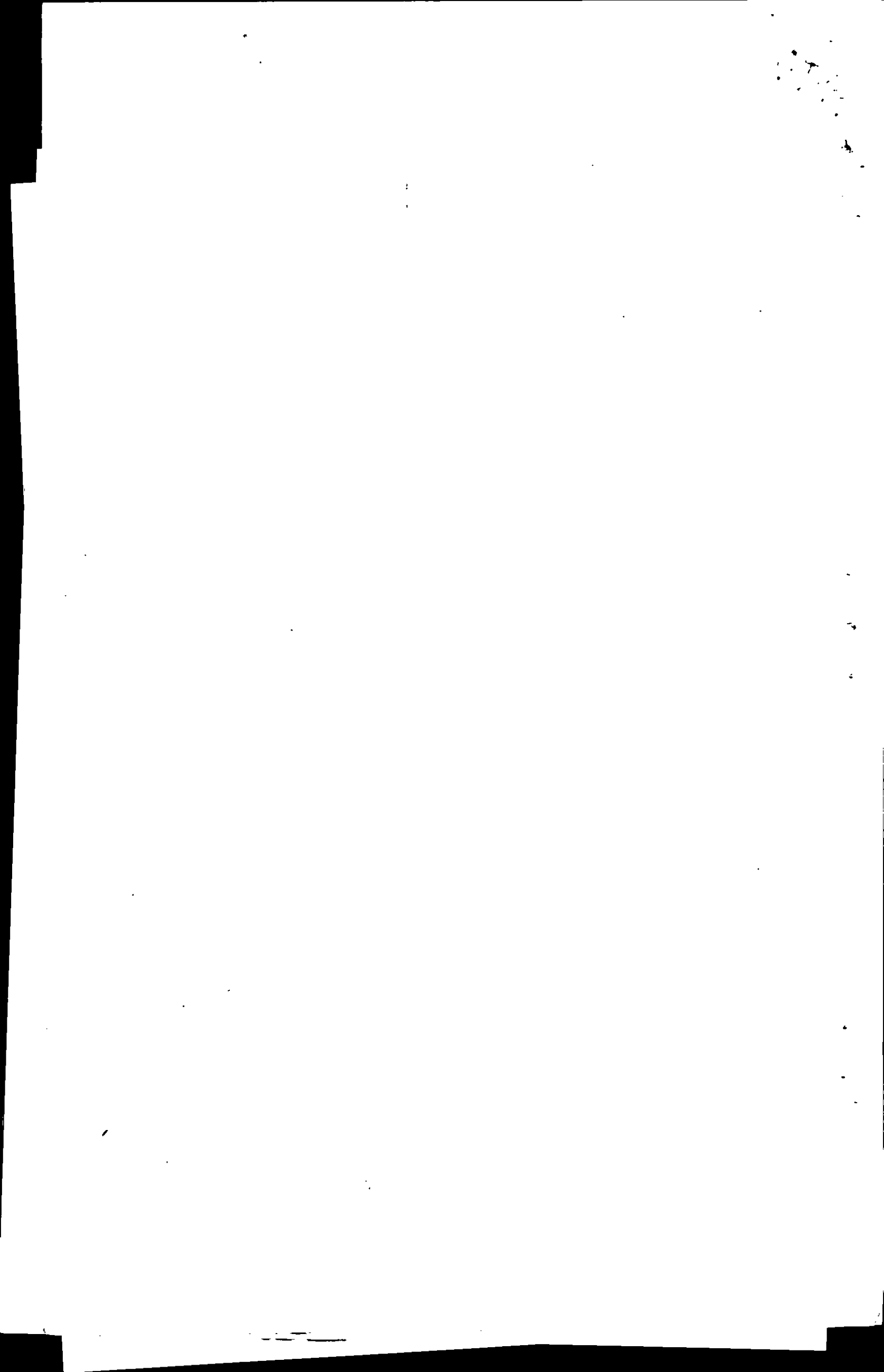
Prepared by Shah Mahmood
SET

Headmaster, Jandola
Government High School Jandola, (F. R. D. I. Khan) 8.1986

[Signature]
ATTESTED

Countersigned

Lecturer in
Date 10.10.86



Ref. NGR Part III, Para 25a

PAF (PTF)-21

Book No.

3322

NCC No 332166



THE NATIONAL CADET CORPS

CERTIFICATE OF SERVICE

The Director General National Guards is pleased to record the services rendered by:-

No. P-160988

Name JEHAN ZEB KHAN

Son of MOHAMMAD SHAH

in GOVT DEGREE COLLEGE TANK

with Company TANK Battalion

from 03 Nov 86 to 22 Mar 88

D. I. KHAN

For Director

the Mar 1988 *National Cadet Corps & Women Guards*
(Muhammad Afzal Siddiqui)

Handwritten signature
ATTESTED

APPOINTMENT.

25

BS-14

27/5/1993

Consequent upon the approval of the Departmental Selection Committee the following approved CT (trained) are temporarily appointed, adjusted on Rs. 1485/- P.M in BPS No.9 and Rs. 1530/- P.M in BPS No. 14 for those who are BA/B.Sc IInd Division in case of Serving personnel which ever is beneficial to them) plus usual allowances as admissible under the rules with effect from the dates of their taking over charge in the Schools noted against their names:-

S.No.	Name/Schools.	Posted at.	Remarks.
(1)	Ajab Noor MA CT S/O Sher Dad Khan (SWA).	GHS, Ghagmialai, (S.W.Agency).	Against a vacant SV/CTP
(2)	Gul Khan BA CT S/O Aslam Khan (SWA).	GMS, Zada (S.W.Agency)	Against a vac: SV/CT post.
(3)	Zain-ud-Din BA CT S/O (Abdul Karim).	GMS, Malak Mela (SWA).	-do-
(4)	Abdur Rashid MA CT S/O Miraj Khan.	GMS, Doag, (SWA).	-do-
(5)	Jehan Zeb B.Sc CT S/O Muhammad Shah.	GHS, Tiarza, (SWA).	-do-
(6)	Sadra Azam P.Sc BA B/O Spin Khan (FR.D.I.Khan).	GMS, Doag (SWA).	-do-
(7)	Mazhar-ud-Din F.Sc B.Sc S/O Rehmatullah.	GHS, Tatti Dotani.	-do-

- Notes:-
1. Charge reports should be submitted in duplicate to all concerned.
 2. Their appointment are being made purely on temporary basis and are liable to termination at any time without notice and without assigning reason. In case they wishes to resign their posts they shall have to give one months prior notice or forfeit one month pay in lieu thereof. Their services will be terminated if they are not selected by the Selection Committee.
 3. The original qualification date of birth and Domicile Certificate should be checked before they are handed over charge of the post and attested copies thereof be kept on the record of School.
 4. T./DA etc: is not allowed on first appointment.
 5. The fresh candidates should be sent to the Agency Civil Surgeon concerned for Medical Examination the day on which they report their arrival for duty and no pay should be drawn for them unless and until they produce their Health and Age Certificate from the said Surgeon.
 6. Their verification roll of character and antecedents should be got completed and verified from the Authorities concerned.
 7. They pay scale and service rules would be subject to revision in accordance with orders to be passed by the Government of NWFP, from time to time.

&x

Next Page-2.

ATTESTED

P.T.O.

26

Page-2.

8. They should not handed over charge of the post if the they are below (18) or above (33) years of Age if they fail to resume charge within two weeks their vacancies should be reported to this office (ATONOR).

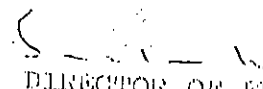
(DR. SHEER ALAM KHAN),
DIRECTOR OF EDUCATION,
FATA, N.W.F.P. PESHAWAR.

Endst: No. 14887-88

Dated Peshawar the 27/5/1993.

Copy forwarded for information and necessary action to the:-

1. Agency Education Officer Concerned.
2. Head Masters Concerned.
3. Candidates concerned.
4. P. A, to D. E. (F A T A), NWFP, Peshawar.
5. Personal Files.


DIRECTOR OF EDUCATION,
FATA, N.W.F.P., PESHAWAR.


ATTESTED

M. ARIF.

MEDICAL CERTIFICATE.

Name of Official... Jehan Zeb Khan

Caste or race... Bhittansi

Father's name... Mohd Shah

Residence... Vill: P/o + Teh: Tandola (FR) D.I Khan

Date of birth... 6.9.1970 (Sixth September Seventy only) (Matra Certificate)

Exact height by measurement... 6'3"

Personal mark of identification... A. Mole on neck

Signature of the Official... [Signature]

Signature of head of office... [Signature]

Seal of Office... (FR) D.I Khan

I do hereby certify that I have examined Mr Jehan Zeb Khan a candidate for employment in the Office of the Fata Education Deptt. and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nil

I do not consider this as disqualification for employment in the office of the Fata Edu. Deptt. His age according to his own statement 22⁹ year and by appearance about thirty two years nine months 12



LEFT HAND THUMB AND FINGER IMPRESSIONS. 8-06-93

[Signature] Medical Superintendent, D.H.O. Hospital D.I, Khap. Medical Superintendent, Civil Hospital, D.I Khan. 08/6/93

[Signature] ATTESTED



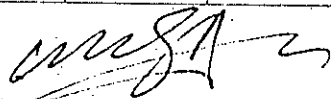
OFFICE OF THE
AGENCY EDUCATION OFFICER,
FR DIKHAN/TANK AT D.I.KHAN.

28

Office Order:-

In pursuance to the Government of NWFP Directorate of Education FATA letter No.10107-17 dated 25-06-2008 and Government of NWFP Finance Department No.FD/SO(FR)10-22/2007 dated 26-01-2008 sanction is hereby accorded to the award of higher pay scale of the following officials of FR Tank as mentioned against each subject to entitlement.

S.No	Name & Design:	Schools	Award of BPS	Date of Award
1.	Nadir Zaman CT	GHS Jandola	15	01/10/2007
2.	Mumtaz Khan CT	Do	15	01/10/2007
3.	Jahan Zeb CT	Do	15	01/10/2007
4.	Mir Hussain CT	Do	15	01/10/2007
5.	Inayatullah CT	Do	15	01/10/2007
6.	Abdur Rehman CT	Do	15	01/10/2007
7.	Abdul Naveed CT	Do	15	01/10/2007


Agency Education Officer,
FR D.I.Khan/Tank. ~ 26/11/08

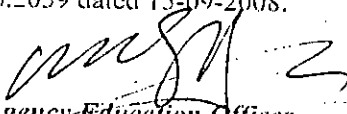
Note:- Necessary entry to this effect should be made in their Service Books and other relevant record.

Endst: No. 2539458

Dated D.I.Khan the 27/11/2008.

Copy to the:-

1. District Accounts Officer, Tank.
2. Principal GHS GHS Jandola FR Tank w/r to his No.2059 dated 15-09-2008.
3. Pay Clerk Local Office.
4. Teachers Concerned.


Agency Education Officer,
FR D.I.Khan/Tank.
~ 26-11-08

Shafiq Dotimi*


ATTESTED

29

A

نوٹ: براہ مہربانی اس خط کی پشت پر درج شدہ ہدایات کو غور سے پڑھیں

حج کیلئے روانگی پروگرام

Revised due to Technical Reason

HAJ MAIL
حج ڈاک
POSTAGE PREPAID

سیپورٹ نمبر
پرواز نمبر
گروپ نمبر
پرواز کی تاریخ
پاکستان وائس کی تاریخ
تاریخ اجراء
حاجی کیپ کا پتہ

TICKET & PASSPORT
DLIVERED

457369 .4
PK351
103070
10/12/2007
AFTER HAJJ
20/01/2008
30-Nov-07

Peshawar To
نوٹ: حالات بنا ہونے کی صورت میں اس سروس کو ہمیں روکنا پڑ سکتا ہے۔
گرمیوں کی وجہ سے اس سروس میں تاخیر ہو سکتی ہے۔
اس سروس کے بارے میں مزید جاننے کے لیے براہ کرم ہمارے نمبر پر رابطہ کریں۔

JEHANZEB KHAN
MUHAMMAD SHAH
UMERKHEL PO JANDOLLA
TEH TANK
TEHSIL: TANK
PHONE: 0963519436
DISTRICT: TANK

Vol: 11721 - 08

Hajj Camp, Peshawar: Hajj Complex, Sector E-8, Phase 7, Hayat Abad, Peshawar. Ph: (091) 9217483, 9217482

ATTESTED



30

Application No. [Please provide first six digits of Hajj Application No.]

457369

Search

HAJJ APPLICANT STATUS / FLIGHT INFORMATION IIA JJ - 2007

Party No.:103070-Flight Number/ Date:PK351*10-12-2007/J-Dept:0830-Return

Flight Date:20-1-2008

Gateway:Peshawar

Application No. 457369*4

Father / Husband Name: MUHAMMAD SHAH

Cnic: 2260125926749

Leader App.No.: 4666347

Mehram App.No.:

Status: SUCCESSFUL

Folder/Serial: 11721-08

P.K 732

گزارش پرواز پشاور سے آئے گی

ATTESTED

2

جمهورية باكستان الإسلامية
ISLAMIC REPUBLIC OF PAKISTAN
خاص بسلطات المملكة العربية السعودية
وزارة الحج
ONLY FOR SAUDI AUTHORITIES
MINISTRY OF HAJJ

FILE NO. رقم الملف

مجموعة الخدمات لحجاج جنوب آسيا بمكة المكرمة
GROUP OF SERVICES FOR THE SOUTH ASIAN PILGRIMS
MAKKAH AL MUKARRAMAH

MAKTAB NO. 40 مكتب رقم

مجموعة الخدمات في المدينة المنورة بالمملكة العربية السعودية الأهلية للإرشاد
GROUP OF SERVICES AT MADINAH MUNAWWARAH:
AL AHLIA ESTABLISHMENT FOR GUIDANCE

AGENT IN JEDDAH: الوكيل بجدة:
UNITED AGENTS OFFICE مكتب الوكلاء الموحد

PASSPORT NO. 457369 * 4 رقم الجواز

3

32
جمهورية باكستان الإسلامية
ISLAMIC REPUBLIC OF PAKISTAN
OBSERVATIONS
ملاحظات

Mehram Name:

Mehram Passport No.:

Mehram Relation:

Party No: 103070

Flight No. / Date: PK351 / PK731 10/ 08/12/2007

Building No / Maktab/Rent(SR) 4219 / 40 1800

Madinah Dept.: BEFORE HAJJ

Return Flight No. / Date: PK732 / PK350 19 JAN 20/ 14/01/2008

مفتوح للتجارة



PASSPORT NO. 457369 * 4 رقم الجواز

ATTESTED

F

HAJJ 2007 AD

حج ڈائریکٹریٹ مدینہ منورہ کیلئے
For Hajj Directorate Madina Munawwarah

NAME الاسم

JEHANZEB KHAN

FATHER/HUSBAND'S NAME اسم الأب / الزوج

MUHAMMAD SHAH

PLACE AND DATE OF BIRTH محل الميلاد و تاريخه

TANK, 1970

ADDRESS عنوان الإقامة الدائم

UMERKHEL PO JANDOLLA TEH TANK
DISTT: TANK, Ph: 0963519436



457369*4



Mahd

JOINT SECRETARY
TO THE
GOVERNMENT OF PAKISTAN

33

HAJJ 2007 AD

G

خاص بسلطات المملكة العربية السعودية
(تسجيل بواسطة مكتب الوكلاء الموحد)
THIS PAGE IS ONLY FOR KINGDOM OF SAUDI ARABIA
(THROUGH MAKTAB UL WUKALA AL MUWAHHAD)

FILE NO. رقم المحضر

AIRPORT DEPARTURE مطار المغادرة

JEDDAH
DATE OF DEPARTURE تاريخ المغادرة20/
18/01/2008

FLIGHT NO. رقم الرحلة

PK732 / PK350 20/
18/01/2008NATIONALITY جنسية
PAKISTANI باكستاني

PASSPORT NO. رقم الجواز 457369 * 4

Rai
ATTESTED

Application No. [Please provide first six digits of Hajj Application No.]

39

457369

Search

HAJJ APPLICANT STATUS / FLIGHT INFORMATION Hajj - 2007

Party No.: 103070-Flight Number/ Date: PK351*10-12-2007/J-Dept.: 0830---Return
Flight Date: 20-1-2008
Gateway: Peshawar

Application No. 457369*4

Name: JEHANZEB KHAN

Father / Husband Name: MUHAMMAD SHAH

Cnic: 2260125926749

Leader App.No.: 4666347

Mehram App.No.:

Status: SUCCESSFUL

Folder/Serial:

11721-08

PK 732

کراچی ایئر پورٹ پر 4 بجے آئے گی

جاری ہے


ATTESTED

<http://www.hajjinfo.org/ballotresult2007/res>

px

12/1/2007

3

44*

Annex

OFFICE OF THE AGENCY EDUCATION OFFICER, FR DIKHAN/TANK AT D.I.KHAN

REMOVAL FROM SERVICE

Reference D.C.O Tank Endst: No. 06:06-97 dated 10-12-2009 Mr. Jehan Zeb Khan CT
GIS Jandola is hereby removed from his service under RSO 2001 (Removal from
Service Special Powers) with immediate effect.

Agency Education Officer,
FR Dikhan/Tank

Dated DIKhan the 12/12/09

Endst: No. 0587-92

Copy to the:

1. Director of Education (FATA), NWFP Peshawar.
2. Commissioner D.I.Khan Division.
3. D.C.O Tank with reference to his letter cited above.
4. District Accounts Officer, Tank.
5. Principal GIS Jandola, FR Tank.
6. Teacher Concerned.

Agency Education Officer,
FR Dikhan/Tank

[Signature]
ATTESTED

BEFORE

INSPECTOR GENERAL
FRONTIER COURTS, JILDA BALA HISAR,
PESHAWAR.

45

Subject: - ILLEGAL ARREST OF JAHAN ZAIB SON OF MUHAMMAD SHAH
CASTE BHITTANI RESIDENT OF VILLAGE JANDOLA FR TANK
ON 20.01.2008 AT KARACHI AIRPORT WHILE COMING BACK
FROM SIDI ABIA AFTER PERFORMANCE HAJJ 2008.

Respectfull, Sheweta

That Mr; Jahan Zaib son of Muhammad Shah is Permanent resident of village Jandola FR Tank. He had gone to Sidi Arabia for performance of hajj Session 2008. On return from Hajj he was arrested at Karachi Airport on 20.01.2008, on suspicion to be Talib Terrorist.

not He was taken to unknown place and his whereabouts are/known to his relatives to defend his case. As far his Subversive activities are concerned he is not a Talib nor he hails from Taliban group now days busy in Terrorism. Any how we are ready to provide his clearance certificate from quarter concerned.

In view of the above mentioned facts the applicant Alamgir Khan his real brother beg to approach your good self that his whereabouts may kindly be enquired with approach to Military Intelligence Karachi that now the case against Jahan Zaib stand and what sort of Charges levelled against him so that we may defend his case from all angles, providing proof that he is Not Talib nor indulge in any subversive activities but a Bhattani by caste and Taolighi by preecning Islam.

Thanking you Sir,

Your's Obediently

Petitioner

Alamgir Khan Son of
Muhammad Shah Bhattani of
Jandola real Brother of
Accused Jahan Zaib Detunee
F.R. TANK.

Tank,
15.12.2009.


ATTESTED

(47)

Respectfully Sheweth:

1. That appellant is bonafide resident of FR Tank and was appointed as Certified Teacher (CT BPS-14), vide appointment order No.14887-98, dated 27.05.1993, on the strength of B.Sc qualification and obtaining the mandatory training certificate from Govt. in Service Teachers training College, Jamrud Khyber Agency, in the year 1991-92 and, after medical examination, joined his service and was performing duties with zeal/devotion and utmost satisfaction of the superiors.

(RELEVANT DOCUMENTARY PROOF IS ANNEXED HEREWITH FOR THE KIND PERUSAL OF YOUR HONOUR).

2. That appellant was performing duties regularly, however, due to military operation against the outlaws in FR Tank and adjacent tribal areas, his school of duty was closed for all type of students affairs, rather the school building was occupied by the military personnel, in the meanwhile, appellant alongwith is m other Mst. Khani Gula (widow), applied for Hajj, in July 2007, in pursuance of approval of the Hajj Department, proceeded for performing Hajj in December, 2007, however, on arrival back from Hajj was intercepted on Quaid-e-Azam International Airport Karachi by the security agencies on 20.01.2008 and shifted to unknown place, without informing/ furnishing grounds of such arrest.

(PROOF OF HAJJ DOCUMENTS AND NEWSPAPER CLIPPINGS ARE ATTACHED AS READY REFERENCE).

3. That family of appellant, particularly old aged ailed mother, exhausted all possible remedies for safe recovery of appellant, but failed, eventually, she did not afford endless forced disappearance of her son and died in the year 2013, in absence of appellant and the security agencies, after detail investigation, came to the conclusion that appellant is innocent, hence released on 25.12.2013.
4. That appellant, after release from the clutches of security agencies, was seriously ill and was not able to walk, besides mentally shocked and was almost in trauma for about a year, after his release, when got senses, approached the competent authority on 01.09.2014, which was considered, but not materialized so far, which resulted into instant appeal.

(RELEVANT DOCUMENTARY PROOF IS ATTACHED AS READY REFERENCE).


ATTESTED

5. That appellant has been subjected to highhandedness and extremely humiliated for no wrong and, instead to be compensated for such highhandedness of security, he was shunt out from service with a single stroke of pen without care and caution of its legal consequences, rather the authority did not bother to either serve upon him mandatory show cause notice, or to conduct full-fledged inquiry into his guilt, which has caused grave miscarriage of justice.
6. That absence of appellant from duty was not deliberate, but occasioned due to the hands of security agencies and the situation was beyond his control, rather all his cries for justice felt to deaf ear and was severely tortured and subjected to third degree methods of interrogation, which has directly affected his physical as well as mental status and gone through hazardous situation and due to his long forced disappearance, his school going children suffered a lot and their career has been deteriorated for no wrong, however, sight of departmental authorities escaped from such factum of the case, hence arrived at a wrong conclusion.
7. That appellant is innocent and has wrongly been imposed major penalty of removal from service by the competent authority, furthermore, no opportunity of personal hearing was ever provided to appellant, rather he has been condemned unheard throughout, which attracts principle of *audi-alteram-partem*. Reliance is placed on full court judgment of the Apex Court of Pakistan (Hon'ble 14 Judges), in case titled "Justice Khurshid Anwar Bhinder & others vs. Federation & another", reported in PLD 2010 SC 483.
8. That major penalty of removal from service could only be imposed in exceptional circumstances and needs serious probe/ inquiry, including recording of evidence and providing opportunity to appellant to cross them examine and the law/ rules has laid down a proper mechanism for such like evidence and prior to take the same into consideration appellant should have been confronted with the same, which is not the case in hand, hence, on this score alone, appellant is entitled to be re-instated in service with all back benefits.


ATTESTE

(49)

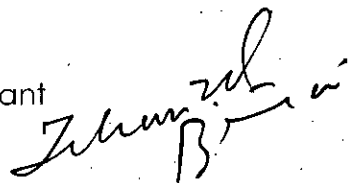
9. That appellant is the sole breadwinner of the entire family, consisting of four daughters and two minor sons, however, not able to continue their studies due to lack of financial resources, which requires attention of your honour and proprietary demands to issue appropriate directions to the concerned quarters and to ask them that under which authority of law they deviated from normal course of law and imposed major penalty of removal from service upon appellant without due process of law and fulfillment mandatory obligations, enshrined in Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973, and if they failed to equip their reply with cogent reasons, appellant may immediately be re-instated in service, so as to rescue him as well as his entire family from further deterioration, protected under Article 35 of the Constitution of Pakistan, 1973, hence your honour being competent authority, is equipped with ample powers to annul the impugned order of his removal from service dated 12.12.2009 alongwith all pre and post proceedings, and he may be re-instated in service from the date of removal alongwith all back benefits, so as to enable him to continue into service with the same spirit, zeal and devotion and to survive honorably.
10. That any other ground would be taken with the permission of this your honour, if opportunity is granted.

It is, therefore, most humbly prayed that on acceptance of instant departmental appeal, impugned order dated 12.12.2009 of respondent No.3 may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence be set at naught and appellant may be re-instated in service from the date of his removal from service, with all back benefits, so as to secure the ends of justice.


ATTESTED

Dated: 28.02.2015

Appellant



Jehanzeb Khan
S/o Muhammad Shah
R/o Village Umar Khel,
Tehsil Jandola, FR Tank

50

BEFORE THE FATA GRIEVANCE REDRESSAL CENTER, FATA SECRETARIAT
PESHAWAR

SSD NO - 221

22/2/2016
19

DE FATA
20-2-16

Grievance Petition No. _____/2016

Jehanzeb Khan S/o Muhammad Shah

R/o Village Umar Khel, Tehsil Jandola, FR Tank: PETITIONER

...VERSUS...

1. Secretary Education (FATA),
FATA Secretariat, Warsak Road, Peshawar.
2. Director Education (FATA),
FATA Secretariat, Warsak Road, Peshawar.
3. Agency Education Officer, FR D.I:Khan/ Tank.
4. Principal Government High School Jandola. RESPONDENTS

Jehanzeb
1436
23/2/16

GRIEVANCE PETITION AGAINST ORDER OF REMOVAL FROM SERVICE OF PETITIONER, BEARING NO.0587-92, DATED 12.12.2009 OF RESPONDENT NO.3, VIDE WHICH HE WAS REMOVED FROM SERVICE UNDER RSO, 2001 (REMOVAL FROM SERVICE SPECIAL POWERS).

PRAYER: On acceptance of instant Petition, impugned order dated 12.12.2009 of respondent No.3 may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence be set at naught and petitioner may be re-instated in service from the date of his removal from service, with all back benefits, so as to secure the ends of justice.

[Signature]
ATTESTED

Respectfully Sheweth:

1. That petitioner is bonafide resident of FR Tank and was appointed as Certified Teacher (CT BPS-14), vide appointment order No.14887-98, dated 27.05.1993, on the strength of B.Sc qualification and obtaining the mandatory training certificate from Govt. in Service Teachers training College, Jamrud Khyber Agency, in the year 1991-92 and, after medical examination, joined his service and was performing duties with zeal/devotion and utmost satisfaction of the superiors.

(RELEVANT DOCUMENTARY PROOF IS ANNEXED HERewith FOR THE KIND PERUSAL OF YOUR HONOUR).

2. That petitioner was performing duties regularly, however, due to military operation against the outlaws in FR Tank and adjacent tribal areas, his school of duty was closed for all type of students affairs, rather the school building was occupied by the military personnel, in the meanwhile, petitioner alongwith is m other Mst. Khani Gula (widow), applied for Hajj, in July 2007, in pursuance of approval of the Hajj Department, proceeded for performing Hajj in December, 2007, however, on arrival back from Hajj was intercepted on Quaid-e-Azam International Airport Karachi by the security agencies on 20.01.2008 and shifted to unknown place, without informing/ furnishing grounds of such arrest.

(PROOF OF HAJJ DOCUMENTS AND NEWSPAPER CLIPPINGS ARE ATTACHED AS READY REFERENCE).

3. That family of petitioner, particularly old aged ailed mother, exhausted all possible remedies for safe recovery of petitioner, but failed, eventually, she did not afford endless forced disappearance of her son and died in the year 2013, in absence of petitioner and the security agencies, after detail investigation, came to the conclusion that petitioner is innocent, hence released on 25.12.2013.

4. That petitioner, after release from the clutches of security agencies, was seriously ill and was not able to walk, besides mentally shocked and was almost in trauma for about a year, after his release, when got senses, approached the competent authority on 01.09.2014, which was considered, but not materialized so far, which resulted into instant appeal.

(RELEVANT DOCUMENTARY PROOF IS ATTACHED AS READY REFERENCE).


ATTEST

5. That petitioner has been subjected to highhandedness and extremely humiliated for no wrong and, instead to be compensated for such highhandedness of security, he was shunt out from service with a single stroke of pen without care and caution of its legal consequences, rather the authority did not bother to either serve upon him mandatory show cause notice, or to conduct full-fledged inquiry into his guilt, which has caused grave miscarriage of justice.
6. That absence of petitioner from duty was not deliberate, but occasioned due to the hands of security agencies and the situation was beyond his control, rather all his cries for justice felt to deaf ear and was severely tortured and subjected to third degree methods of interrogation, which has directly affected his physical as well as mental status and gone through hazardous situation and due to his long forced disappearance, his school going children suffered a lot and their career has been deteriorated for no wrong, however, sight of departmental authorities escaped from such factum of the case, hence arrived at a wrong conclusion.
7. That petitioner is innocent and has wrongly been imposed major penalty of removal from service by the competent authority, furthermore, no opportunity of personal hearing was ever provided to petitioner, rather he has been condemned unheard throughout, which attracts principle of *audi-alteram-partem*. Reliance is placed on full court judgment of the Apex Court of Pakistan (Hon'ble 14 Judges), in case titled "Justice Khurshid Anwar Bhinder & others vs. Federation & another", reported in PLD 2010 SC 483.
8. That major penalty of removal from service could only be imposed in exceptional circumstances and needs serious probe/ inquiry, including recording of evidence and providing opportunity to petitioner to cross them examine and the law/ rules has laid down a proper mechanism for such like evidence and prior to take the same into consideration petitioner should have been confronted with the same, which is not the case in hand, hence, on this score alone, petitioner is entitled to be re-instated in service with all back benefits.



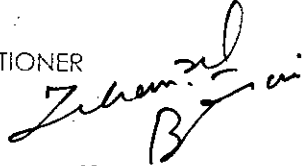
ATTESTED

9. That petitioner is the sole breadwinner of the entire family, consisting of four daughters and two minor sons, however, not able to continue their studies due to lack of financial resources, which requires attention of your honour and proprietary demands to issue appropriate directions to the concerned quarters and to ask them that under which authority of law they deviated from normal course of law and imposed major penalty of removal from service upon petitioner without due process of law and fulfillment mandatory obligations, enshrined in Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973, and if they failed to equip their reply with cogent reasons, petitioner may immediately be re-instated in service, so as to rescue him as well as his entire family from further deterioration, protected under Article 35 of the Constitution of Pakistan, 1973, hence your honour being competent authority, is equipped with ample powers to annul the impugned order of his removal from service dated 12.12.2009 alongwith all pre and post proceedings, and he may be re-instated in service from the date of removal alongwith all back benefits, so as to enable him to continue into service with the same spirit, zeal and devotion and to survive honorably.

10. That any other ground would be taken with the permission of this your honour, if opportunity is granted.

It is, therefore, most humbly prayed that on acceptance of instant departmental appeal, impugned order dated 12.12.2009 of respondent No.3 may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence be set at naught and petitioner may be re-instated in service from the date of his removal from service, with all back benefits, so as to secure the ends of justice.


ATTESTED

PETITIONER

JEHANZEB KHAN
S/O MUHAMMAD SHAH
R/O VILLAGE UMAR KHIEL,
TEHSIL JANDOLA, FR TANK

DATED: 23.02.2016

بصورت جناب ایجنسی ایجوکیشن آف نڈ صاحب FR ٹانگ
بوسا طت جناب پرائیمری صاحب پرائیمری ہسٹریٹ FR ٹانگ
"درخواست بڑا داری مالی سرورس و ادائیگی قلم واجبات"

دام امتیالہ 1

جناپا

محترمانہ خط کہ فدوی 1999ء سے 2007ء ہسٹریٹ میں بحیثیت ای جی پی
زوالض منصبی سرانجام دے رہا تھا۔

فدوی دسمبر 2007ء میں اپنی ماں کے ہمراہ فریڈنہ حج کی ادائیگی کیلئے گیا۔
سورنی قسبت فدوی کے ذاتی اور خانوادگی دستخون اور بدخواہوں کے جھوٹے اور غلط الزامات
الطردعات کی بنیاد پر حج سے والی پر موز 20 جنوری 2008ء کو کراچی ایئر پورٹ
پر گرفتار کیا گیا۔ ایک بلے شرے تک دوران حراست قسبت ایجنسیاں
اور ادارے تفتیش کرتے رہے۔ لیکن بفضل تعالیٰ سورنی صدمہ گناہ
ثابت ہو کر دسمبر 2007ء میں رہائی ملی۔

جناب اللہ! رہائی کے بعد معلوم ہوا کہ فدوی کو بحوالہ AEO ایوارڈ ٹانگ حکمی نمبر 2587-72
بتاریخ 12 دسمبر 2009ء نوکری سے Remove کیا گیا ہے۔

فدوی قوم بستی کے ایک محرز مشرف النفس اور قسبت دن خانہ میں سے تعلق رکھتا ہے۔
فدوی ملک و قوم اور خلاف قانون سرگرمیوں میں ملوث ہو گیا بصورتی نہیں کر سکتا۔
فدوی کو دوران ملازمت سکول میں ایک حاضر باش، جسے نیا نام دیا گیا اور
فرض شناس پیچھے ہو گیا شرف اور حیثیت حاصل رہی۔

فدوی کے جھوٹے جھوٹے بلے ہیں جبکہ اور کوئی ذریعہ معاش نہیں ہے۔ بنا بریں
امتیالی ذہنی کوفت اور شدید مالی مشکلات کا سامنا ہے۔

لہذا آجائے خدمت ادرں میں ملتس ہوں کہ

فدوی کے محترمانہ اور حقان کو دید نظر رکھ کر "سرورس مالی بعلاد
مذکورہ شرے کے جملہ واجبات کی ادائیگی" سے اٹھاتا۔ صادر فرمادیں۔
بندہ تادم ذہیرت دعاگو اور شکر گزار رہے گا

تقریر 9/2014

عشر صبر

فدوی جہان زینت خاں بی بی دلا محمد شاہ 4115 ہسٹریٹ FR ٹانگ
سکنہ گاڈن ٹریٹیل تحصیل ہسٹریٹ FR ٹانگ

ای جی پی
پی

P.T.O

Handwritten signature

ATTESTED

22601-2592974-9

Forwarded to the Agency Education Officer FR Tank with the remarks that the request of the applicant is based on fact. The service history of the teacher concerned shows that he had been a very regular, punctual, co-operative & sincere towards his teaching assignment at this station. His restoration will not only support the financial need of his innocent children but it will be very beneficial for the youngsters of this school as his post is already lying vacant since long.

[Signature]
Principal
Govt High School Jandola

P/S No 1060 dt 09-9-2014
FR Tank

Forwarded in original to DC/PA FR Tank with the remarks that the applicant was removed from his service via DCO Ltr. No 4696-97 dt 10-12-2009 and AEO Ltr No 2587-92 dt 12-12-2009.

The application has already recommended by concerned Principal. His request is based on fact. His case for reinstatement is hereby recommended and submitted for your kind perusal and n/a please.

[Signature]
PL put up
FR Tank
16/9

[Signature]
DAC (2)
AEO FR Tank
17/9/14

ATTESTED

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, NWFP, PESHAWARNotification

Consequent upon the recommendation /order of the competent authority, Mr. Shafiullah Ex-SET GHS Looni District D.I. Khan (under termination) is hereby re-instated with immediate effect.

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa

Endst: No 616-21 / F/No 160 dt 4-1-13

Copy of the forwarded information and necessary action to the:-

1. District Education Officer (E&SE) D.I. Khan.
2. District Accounts Officer D.I. Khan.
3. Teacher concerned.
4. Head Master concerned.
5. P.S to Secretary Govt: Khyber Pakhtunkhwa S&SE Department w/r to letter No. SO (Primary) 5-1/Misc/2919/01: IV dated 28.12.2012.
6. PA to Director Elementary & Secondary Education Local Office

Deputy Director (Estt)
Elementary & Secondary Education
Khyber Pakhtunkhwa

ATTESTED

2
4/1/13

Hisamul Haq Klattak
No 3 Kotat Principul

57

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) D.I.KHAN.

Adjustment Order.

Consequent upon the approval of the competent authority issued vide No.616-21/F.No.160/dated 04.01.2013. ~~Mr~~ Mr. Shafi Ullah SST ^{P.S.} (Re-istated) is hereby adjusted at GHS Looni against the vacant with immediate effect.


Sd/-

District Education Officer
(M) D.I.Khan

Endst:No. 71-74 /EA-I/Esstt:/Dated DIKhan the 07/4/20

Copy of the above is forwarded to :-

1. The Director Elementary & Secondary Edu:Khyber Pakhtunkhw Peshawar w/r to your No.cited above.
2. P/S to Secretary Edu:khyber Pakhtunkhwa Peshawar.
3. The Head Master GHS Looni DIKhan.
4. The Teacher Concerned.


Distt: Education Officer(
D.I.Khan.


ATTESTED

14277

date 15/10/2011

(58)

From: - The Executive District Officer,
(E&SE) D.I.Khan.

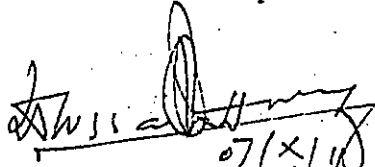
To: - The Deputy Director (Estt)
(E&SE) Khyber Pakhtunkhwa,
Peshawar.

Subject: - Department appeal of Mr. Shafiullah
EX-SST GHS Looni, Kulachi (DIKhan).

Memorandum.

Reference correspondence resting
with your office letter No.2812, dated
25.6.2011 (File No.160/SET(M)DIKhan.

The requisite comments are
enclosed herewith for your kind honour's
consideration and further orders please.

Encl: As above. 
Executive District Officer,
(E&SE) D.I.Khan.


ATTESTED

WRITTEN COMMENTS ON BEHALF
 OF EXECUTIVE DISTRICT OFFICER (E &SE) DIKHAN
 WITH REGARD TO THE DEPARTMENTAL APPEAL
 FILED BY SHAFI ULLAH SON OF ABDUL MAJEED EX-
 SET GHS LOONI TEHSIL KULACHI DISTRICT DIKHAN
 AGAINST THE ORDER NO. 215-17/DCO, DATED 7-1-2010
 ISSUED BY THE DCO, DIKHAN VIDE WHICH HE WAS
 TERMINATED FROM HIS SERVICE AS SET/SST
 WHEREBY HE ^{HAS} REQUESTED FOR HIS RE-
 INSTATEMENT IN SERVICE AFTER SETTING ASIDE
 THE ORDER OF THE DISTRICT COORDINATION
 OFFICER, DIKHAN

Respectfully Sheweth;

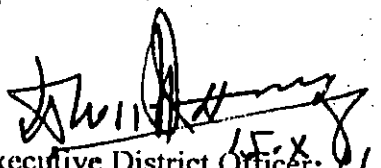
1. That the Appellant Shafi ullah is permanent resident of village Looni Tehsil Kulachi District DIKhan and is M.Ed.
2. That he was employed as PTC/SET in the Education Department in the year, 1982 and was having qualifying service of about 28 years at his credit.
3. That he was serving in Government High School Looni Tehsil Kulachi District DIKhan when the District Coordination Officer, DIKhan his office order No. 215-17/DCO dated 7-1-2010, on the grounds that he was working for Tehrik-e-Taliban Pakistan at local level. The copy of order is enclosed.
4. That the Appellant is an old employee of the Education Department and there is nothing adverse against him in this office record.
5. That the worthy DCO, DIKhan has passed the order under special powers delegated to him under the NWFP removal from Service (Special Powers) Ordinance No. V of 2000 and has not observed codel formalities required under the Government Servants (Efficiency & Discipline Rules, 1973).


ATTESTED

6. That this office record is however silent about the involvement of the Appellant with the local Tehrik-e-Taliban activities, in any kind.

Note:- All those such like so called involved in terrorist activities & removed from service in District Dir, Malakand & Swat has been re-instated on their original posts.

So, it is, humbly solicited that he may also please be re-instated.


Executive District Officer:
E & SE, DIKhan


ATTESTED

To,

The Honorable Mushtaq Jadoon,
Secretary,
Education (Schools),
Khyber Pakhtun Khawa,
Peshawar.

Subject: **REQUEST FOR REINSTATEMENT OF SERVICE WITH BACK BENEFITS.**

Sir,

With profound reverence I have the honour to bring to your kind notice that the applicant Shafi Ullah Khan S/O **Abdul** Majeed was posted as S.E.T at G.H.S Looni, Tehsil Kulachi. The applicant joined the Education Department w.e.f 03-11-1982.

Unfortunately, the applicant was labeled as a local supporter of Tehrik-E-Talaban Pakistan which was just an allegation, but on 07 January, 2010 the D.C.O D.I.Khan terminated the service of applicant without any show cause notice and without full filling the legal formalities.

The applicant's 28 years service was not taken into consideration.

R/sir,

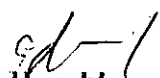
The applicant is a patriot and will remain so till his death. I can never imagine doing harm to my country and I think it is a crime of serious nature.

By grace of all mighty ALLAH, I have never been part of any conspiracy against my beloved country. That is why I appear before Pak army whenever it needed me without any fear. Pak Army freed me from all the charges.

Your honour, the applicant's growing old age and tender ages of my children whose sole prop is the applicant himself is now facing serious hard ship to earn for his own family due to unemployment.

Keeping in view, the above mentioned precarious condition of the applicant's family it is humbly requested that orders may kindly be issued for the poor and innocent applicant's reinstatement with back benefits.

I shall remain highly obliged for my whole life.


Your Humble servant
Shafi Ullah Khan S/O Abdul Majeed
Village Loony, Tehsil Kulachi.
District, D.I.Khan
Khyber Pakhtunkhwa.

17

OFFICE OF THE DEPUTY COMMISSIONER PAF FR TANK

No. 6406 / 1066

Date: Tank

52 / 09 / 2014

To

The Director of Education
Director of Education FATA PAF

Subject: -

APPLICATION FOR RE-INSTATEMENT AND PAYMENT OF PREVIOUS DUES

Name:

An application in respect of Umer Khal Jandola r/o Muhammed Shah r/o Umer Khal Jandola FR Tank and duly endorsed by Agency Education Officer FR Tank vide letter No. 1060 dated 09.09.2014 is sent herewith for favour of further necessary action accordingly.

No. 6406 / 1066

DEPUTY COMMISSIONER PAF
FR TANK

Copy to the Agency Education Officer FR Tank w/r to above.

AMDE

*PC office
16/10/14*

DEPUTY COMMISSIONER PAF
FR TANK

[Signature]
ATTEST

FATA SECRETARIAT
DIRECTORATE OF EDUCATION

NO. 11280
DATED 16/10/2014
F & FILE NO.



DA
Keep on file
mmah
22/11/2014

To: The Agency Education Officer
FR Tank

Subject: APPLICATION FOR RE-INSTATMENT AND PAYMENT OF PREVIOUS DUES.

Memo: I am directed to refer to the Deputy Commissioner/PA FR Tank letter No 6406 dated 30.9.2014 addressed to this Office and copy endorsed to your Office on the subject noted above.

You are therefore requested to send the original service Book, last appointment order, alongwith brief history of the case and also your comments please.

[Signature]
Additional Director (Estab)

Encls: No. _____ / Dated _____ 2014.

Copy to: Deputy Commissioner/PA FR Tank with reference to his No 6406 dated 30.9.2014.

[Signature]
Additional Director (Estab)

[Signature]
ATTESTED

64

No. 1295

Dated the 27/9/2014

From:

The Agency Education Officer,
FR Tank.

To

The Director Education FATA,
RPK Peshawar

Subject:

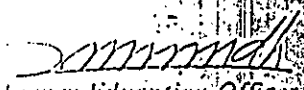
APPLICATION FOR RE INSTATEMENT AND PAYMENT OF PREVIOUS DUES

Content

Please refer to your office letter No. 11280 dated 16/10/2014 and to state that the requisite information i.e original service book, 1st Appointment order is hereby submitted as desired.

Regarding brief history of this case, self explanatory application duly commented by the Principal Concerned and endorsed by this office is hereby submitted for favorable consideration please.

Note: certificate issued by Director, IB is hereby attached with for ready reference please.


Agency Education Officer,
FR Tank.

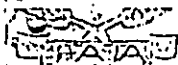
Endos No -----/

Copy to

- 1. The Deputy Commissioner / PA FR Tank for information please.


Agency Education Officer,
FR Tank


ATTESTED



Fakhrabad

NO. 219
DATED 11-3-15
E-7 KHYBER AGENCY

65

Remindor

136

To

The Agency Education Officers
FR Tank

Subject: APPLICATION FOR RE-STATEMENT AND PAYMENT OF PREVIOUS DUES.

Memo;

I am directed to refer to this Directorate letter bearing No. 11280 dated 10/10/14 on the above noted subject and to state that the requisite information is still awaited which may be furnished to this Directorate by Monday positively as it has already been unduly delayed at your end.

[Signature]
Dy. Director (Estab)

Encls. No. 2722-23 / Dated 11-3 2015

Copy to;

1. Dy. Commissioner /PA FR Tank with reference to his letter No. 839 dated 16/2/2015.
2. P.A to Director Education FATA.

[Signature]
Dy. Director (Estab)

ATTESTED

66

No. 434

Date: 12/3/2015

From:

The Agency Education Officer,
F.R Tank.

To,

The Director Education FATA,
KPK Peshawar.

Subject:

APPLICATION FOR RE-INSTALEMENT AND
PAYMENT OF PREVIOUS DUES.

Memo:

Kindly refer to the subject noted above that in the continuation of this Office Letter No:1295 dated:22-10-2014 and to state that the requisite information i.e original Service book, 1st appointment order is hereby submitted as desired.

Regarding brief history of this case, self explanatory application duly recommended by the principal concerned and endorsed by this office is hereby re-submitted for favourable consideration please.

[Signature]
Agency Education Officer
FR Tank

Encl: No. _____

Copy to:

- 1. The Deputy Commissioner/ P.A FR Tank for information Please.

[Signature]
Agency Education Officer
FR Tank

ATL (E) in presence of me posted in...
16/3/15
Process
DOS

[Signature]
ATTESTE



Jahangir

67

FATA SECRETARIAT
 DIRECTORATE OF EDUCATION
 KPK, WARSAK ROAD PESHAWAR, PAKISTAN
 NO. 3313
 DATED 24/3/15
 F.G.F. NO. 36

Immediate

To

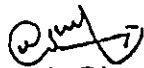
The Agency Education Officer
FR Tank

Subject: APPLICATION FOR RE-INSTANTMENT AND PAYMENT OF PREVIOUS DUES.

Memo;

I am directed to refer to your letter No.434 dated 12/3/2015 in respect of Mr.Jehanzeb Ex-CT Govt High School Jandela FR Tank on the above noted subject.

You are therefore directed to take necessary action at your end as per rules/ policy in vogue.



 Deputy Directress (Estab)

Endst.No. _____ /

Dated _____ 2015

Copy to;

P.A to Director Education FATA.


 Deputy Directress (Estab)


ATTESTED

7

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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
درجہ ملازمت C.T. Post at G.H.S Biarza S.W. 4	عارضی مستقل قائم مقام	B.P.S No 14 ارعارضی ہے تو کیا و درول کے مطابق پیشن کا مستحق ہے	تختخواہ بطور عارضی ملازمت	زائد تختخواہ زائد تختخواہ بطور قائم مقام	باسوائے تختخواہ دیگر الاؤٹس	تاریخ تقرری 30.5.93	دستخط سرکاری ملازم Jehawal P.H.S. in
-do-	-do-	Rs 1649/-				1.12.95	Jehawal P.H.S. in
-do-	-do-	B-14 - 2065-161-4480					
GHS Jandla	off. Temp	Rs 2226/-				1.6.94	
-Do	Do	Rs 2387/-	2226/-			1.6.94	
Do	Do	Rs 2387/-				1.12.94	Jehawal P.H.S. in
Do	Do	Rs 2548/-				12/95	Jehawal P.H.S. in

ATTESTED

Sign
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offic
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Govt
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Princ
G.H.S
P.H.S.

69

1. Name Jehan Zele Khan
(نام)

2. Nationality and Religion Chittani
(قومیت اور مذہب)

3. Residence Village P.P.O. Ch. Jandola (P.R.)
D. J. Chaur (مستقل رہائش)

4. Father's name and residence Mohd Shah
(والد کا نام اور پتہ)

5. Date of birth by Christian era as nearly as can be ascertained 06-9-1970 Sixth September N.H. of Security only (Matric certificate)
(تاریخ پیدائش مطابق سن عیسوی)

6. Exact height by measurement 6-3
(قد و قامت)

7. Personal mark for identification _____ A Scar on RT Side neck.
(نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (None-gazetted) officer.
(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)
Little Finger (چونگیا) Ring Finger (چھنگیا کے ساتھ کی انگلی) Middle Finger (انگشت میاں)



Fore Finger (انگشت شہادت)

Thum (انگونہا)



9. Signature of Government servant _____
(سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office, or other Attesting Officer _____
(تصدیق کنندہ افسر کے دستخط اور مہر)

Jehan Zele Khan
Head Master
Govt. High School
Blarza (S. D. 5)

Note :- The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.
اس صفحہ کے مندرجات کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 - 10 میں دستخطوں کے تاریخ تاریخ ہونی چاہئے۔ انگلیوں کے نشانات کم از کم ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

70

MEDICAL CERTIFICATE.

Name of Official... Jehan Zeb Khan
 Caste or race... Bhattani
 Father's name... Mohd Shah
 Residence... vill: No + Teh: Tandola (FR) D Khan
 Date of birth... 6.9.1970 (Sixth September Seventy only)
 Exact height by measurement... 6'3" *(Metric Certificate)*
 Personal mark of identification... A mole on neck
 Signature of the Official... Jehan Zeb Khan
 Signature of head of office... [Signature]

Took over charge on 30.5.1993 (FN)

[Signature]
 Head Master,
 G.H.S. TANZLA,
 S.W.

Seal of Office

Agency Identifying Officer
 (FIC) [Signature]

All Tia
will proceed with
25/6/93

I do hereby certify that I have examined Mr Jehan Zeb Khan a candidate for employment in the Office of the Fata Education Deptt. and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nil.

I do not consider this as disqualification for employment in the office of the Fata Edu Deptt. His age according to his own statements 22 year and by appearance about Twenty two years Nine Months 12

[Fingerprints]
 BEHIND THIS AND FINGER IMPRESSIONS. [Signature]

[Signature]
 Medical Superintendent
 D.H.O. Hospital D.I, Khan
 Medical Superintendent
 Civil Hospital, [Signature]
08/6/93

ATTEST

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc)	Signature of the Head of the office of other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی، تبادلہ یا برطرفی	دستخط افسر مجاز	فصلت کی نوعیت و معیار	Period Govt. to which debitable گورنمنٹ سے رقم ادا ہوگی	دستخط افسر مجاز	سزا یا جزا یا غیر سزا کارکردگی کا ریکارڈ
						<p>Service verified from office record and roll w.e.f. 1-12-2004 to 30-11-2005 from Pay Bills and other records.</p> <p><i>Mulla</i> PRINCIPAL GHS JANDOL FR Tank</p> <p>Service verified from office record and roll w.e.f. 12-11-2005 to 30-11-2006</p> <p><i>Mulla</i> Principal GHS Jandol, FR Tank</p>	
		<p>T-38 1611218 D. No. P.F. 1796/ as advised of pay & allowances due to me upon upgradation to B-15 w.e.f. 2-12-07 to 30-11-08</p>				<p>Pay fixed Departmentally in B-15 is as under:-</p> <p>Pay on 1-12-2007 (B-14) Rs. 8825/-</p> <p>2-12-2007 (B-15) Rs. 8900/-</p> <p>7-1-2008 (B-15) Rs. 10680/-</p> <p>Next raise on 1-12-2008</p> <p><i>Mulla</i> Principal GHS Jandol FR Tank</p> <p>Option I do hereby opt to revise my pay in the Upgraded Scale BPS-15 after availing usual A/Pne. in the lower scale i.e. B-14.</p> <p><i>Jehanzeb</i> (Jehanzeb et)</p> <p><i>Mulla</i> Principal GHS Jandol FR Tank</p> <p>ATTESTED</p>	
		<p>Undertaking I do hereby undertake that in case of any overpayment made to me towards upgradation to B-15 the same will be recovered from my pay/ Pension, etc.</p> <p><i>Jehanzeb</i> (Jehanzeb et)</p> <p>ATTESTED</p> <p><i>Mulla</i> Principal GHS Jandol FR Tank</p>					

Name of Government Servants : *Mr. Jehan Zeb Khan*

Date of commencement of Service : *30-05-93*

Serial No	PERIOD OF DUTY				LEAVE EARNED		LEAVE AT CREDIT			LEAVE TAKEN											
	On Average Pay			On Average Pay			On Average Pay			On Average Pay											
1	2	3	4	5	6	7	8	9	10	11	12										
Job: Served under					On average pay at 1/11th 1/22nd of column 4	On half average pay at 1/12th 1/22nd of column 4	On average pay subject to a maximum 4/2 months column 8 (18+5)	On average pay in excess of 4/2 month column 8 (18+19+5.7)	On half average pay Columns (20+6)	Date	Against column 7	On Medical Certificate or for Pilgrimage Rest Education and Recreation Ex-Pakistan etc. against column 8 (column 11+12 not to exceed 6months at a time).									
	From	To	Y	M	D	Y	M	D	Y	M	D	Y	M	D	Y	M	D	Y	M	D	
	<i>30/5/93</i>	<i>15/11/93</i>	<i>7</i>	<i>4</i>	<i>15</i>																
	<i>Sixty three days at credit</i>											<i>86 days approx</i>									

PRINCIPAL
GHS JANTOLA
PR. TANE

[Signature]
ATTESTED

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc.)	Signature of the Head of the office of other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
				Nature and duration of leave taken	Govt. to which debitable		
				Period	Govt. to which debitable		
Principal GHS JANDOLA FR. TANK	30/11/2004	وجوبت انقطاع ملازمت ترقی، تبادلہ یا برطرفی	Principal GHS JANDOLA FR. TANK	رضت کی نوعیت و معیار	چار ماہ تک کی رخصت کیلئے اوسط تنخواہ کا تعین	دستخط افسر مجاز	سزا یا جزا یا غیر مناسبت کارکردگی کا ریکارڈ
Principal GHS JANDOLA FR. TANK	30/06/2005	RBPS	Principal GHS JANDOLA FR. TANK			Service Verified w.e.f. 1.12.99 to 30.11.2004 Pay Bills and other office record	
Principal GHS JANDOLA FR. TANK	30/11/2005	A/Inc	Principal GHS JANDOLA FR. TANK			Service Verified w.e.f. 1.12.2000 to 30.11.2001 from Pay Bills and other records This record	
Principal GHS JANDOLA FR. TANK	30/11/2006	A/Inc	Principal GHS JANDOLA FR. TANK			1.12.2001 to 30.11.2002 Pay Bills and other office record	
Principal GHS JANDOLA FR. TANK	30/06/2007	Revised BPS 15/	Principal GHS JANDOLA FR. TANK			Service Verified w.e.f. 1.12.2002 to 30.11.03 from Pay Bills and other office record	
Principal GHS JANDOLA FR. TANK	30/11/2007	A/Inc	Principal GHS JANDOLA FR. TANK				
Principal GHS JANDOLA FR. TANK	30/06/2008	RBPS	Principal GHS JANDOLA FR. TANK			Service Verified w.e.f. 1.12.2003 to 30.11.04 from Pay Bills and other office record.	
Principal GHS JANDOLA FR. TANK		Awarded upgradation to B-15 vide AEO FR Tank No. 2539-50 dt 27-11-2008 vide n.o. of 1.10.2007	Principal GHS JANDOLA FR. TANK				

ATTESTED

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 rule 3.20 of C.S.R. (Ph.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
درجہ ملازمت C.T BPS-14 (3100-290-10300)	عارضی مستقل یا قائم مقام	اگر عارضی ہے تو یک ووہرول کے مطابق پیشن کیا مستحق ہے	تنخواہ بیلور عارضی ملازمت	زائد تنخواہ زائد تنخواہ بطور قائم مقام	ماسوائے تنخواہ دیگر الافنس	تاریخ تقرری	دستخط سرکاری ملازم
GHS Jandolera AR Tank.		8/1/2003	RS. 5740/-	RS. 0		1/12/2003	
do	do	do	RS. 5980/-			1/12/2004	
RBPS-14 (3585-275-11815)			RS. 6865/-			7/2005	
do	do	do	RS. 7140/-			1/12/2005	
do	do	do	RS. 7415/-			1/12/2006	
Revised BPS B-14 (4100-315-13550)							
do	do	do	RS. 8510/-			7/2007	
do	do	do	RS. 8825/-			1/12/2007	
B-15 (4350-350-14850)	do	do	RS. 8900/-			2/12/2007	
Revised B-15 (5220-420-17820)	do	do	RS. 8560/10680/-			7/2008	

ATTESTED

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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 of other Attesting Officer	13 چھٹی LEAVE		14 Signature of the head of the office or other Attesting officer	15 Reference to any recorded punishment, or censure, or reward or praised of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		
					Period عرصہ	Govt. to which debitabile گورنمنٹ سے رقم ادا ہوگی	
Principal GHS Jandola FR TANK D'D'O	30/9/21	وجوبت انقطاع ملازمت ترقی یا تبادلہ یا برطرفی	دستخط افسر مجاز	رضعت کی نومیت و معیار	چار ماہ تک کی رضعت کے اوسط سہ ماہہ کا تعین	دستخط افسر مجاز	سزا یا سزا یا فہرست کارکردگی کا ریکارڈ
Principal GHS Jandola FR TANK	30/11/89	A/Prnc	Principal GHS Jandola FR TANK			Service Verified w.e.f. 1.12.94 to 30.11.95 Pay Bills and other office record	Principal GHS Jandola FR TANK
Principal GHS Jandola FR TANK	30/11/89	A/Prnc	Principal GHS Jandola FR TANK			Service Verified w.e.f. 1.12.95 to 30.11.96 from Pay Bills and other office record.	Principal GHS Jandola FR TANK D'D'O
Principal GHS Jandola FR TANK	30/11/2000	A/Prnc	Principal GHS Jandola FR TANK			Service Verified w.e.f. 1.12.96 to 30.11.97 from Pay Bills and other office record	Principal GHS Jandola FR TANK
Principal GHS Jandola FR TANK	30/11/2001	A/Prnc	Principal GHS Jandola FR TANK			Service Verified w.e.f. 1.12.97 to 30.11.98 from Pay Bills and other office record.	Principal GHS Jandola FR TANK
Principal GHS Jandola FR TANK	30/11/2002	A/Prnc	Principal GHS Jandola FR TANK			Service Verified w.e.f. 15-10-2000 to 15-12-2000 (both days inclusive) on full pay without Medical Certificate vidi D.E FATA NCOEP Peshawar NO. 37510/ dated pesh. 24-10-2002	Principal GHS Jandola FR TANK
Principal GHS Jandola FR TANK	30/11/2002	A/Prnc	Principal GHS Jandola FR TANK			Principal GHS Jandola FR TANK	Principal GHS Jandola FR TANK

ATTESTED

Revised m/s
Principal
GHS Jandola
FR TANK

Drawn Rs 8182/- on a/c of
leave salary w.e.f 15-10-2000
to 15-12-2000.

TNO-366di 10-6-2002-

Granted 60 days leave w.e.f
15-10-2000 to 15-12-2000 (both days inclusive)
on full pay without Medical Certificate
vidi D.E FATA NCOEP Peshawar
NO. 37510/ dated pesh. 24-10-2002

9	10	11	12	13	14	15	
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure or reward or praised of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	دوہیات انقطاع ملازمت ترقی انتداب یا برطرفی	دستخط افسر مجاز	فصلت کی نوعیت و معیار	چار ماہ تک کی رخصت کیلئے اوسط ہمتخواہ کا تعین	دستخط افسر مجاز	سزا یا جزا یا غیر سزا ہار کردگی کا ریکارڈ
Period	Govt. to which debitabe			رہنہ	گورنمنٹ سے رتہ ادا ہوگی		
<p>Head Master, Govt. High School Tiarra (S. W. A.)</p>	30 ¹¹ / ₉₅	Proce	<p>Head Master, G.H.S TIARRA S.W.A.</p>			<p>Newly appointed under D.E. PATA, N.W.F.P. Pellawar Order No 14887-98 dated 27/5/93 on vacant C.T Post at G.H.S. Tiarra S.W.A. Takeover charge on 30/5/93 P.N.</p>	
<p>Head Master, G.H.S TIARRA S.W.A.</p>	31 ³ / ₉₄	Rev	<p>Head Master, G.H.S TIARRA S.W.A.</p>			<p>Head Master, Govt. High School Tiarra (S. W. A.)</p>	
<p>Head Master, G.H.S TIARZA S.W.A.</p>	31 ⁵ / ₉₄	Transfer	<p>Head Master, G.H.S TIARZA S.W.A.</p>			<p>Service verified from 30.5.93 to 30.11.93 from the office copies of pay Bills and other record of the school</p>	
<p>Headmaster, GHS Jandola</p>	30 ¹¹ / ₉₄	A/Snc	<p>Headmaster, GHS Jandola</p>				
<p>Headmaster, GHS Jandola</p>	30 ¹¹ / ₉₅	A/Snc	<p>Principal GHS Jandola ER TANK</p>			<p>Head Master, G.H.S TIARZA S.W.A.</p>	
<p>Principal G.H.S Jandola ER TANK</p>	30 ¹¹ / ₉₆	A/Snc	<p>Principal G.H.S Jandola ER TANK</p>			<p>Pay fixed departmentally in the R.R.P.S No 14 of 1994 provisionally as under:- Pay on 31.5.94 Rs 1649/- Pay on 01.6.94 Rs 2236/- Next increment on 01.12.94</p>	
<p>Head Master, G.H.S TIARZA S.W.A.</p>			<p>Head Master, G.H.S TIARZA S.W.A.</p>			<p>Service verified from 1.9.94 to 30.11.94 from Pay bills and other records</p>	
						<p>Head Master, G.H.S TIARZA S.W.A.</p>	
						<p>Headmaster, GHS Jandola</p>	

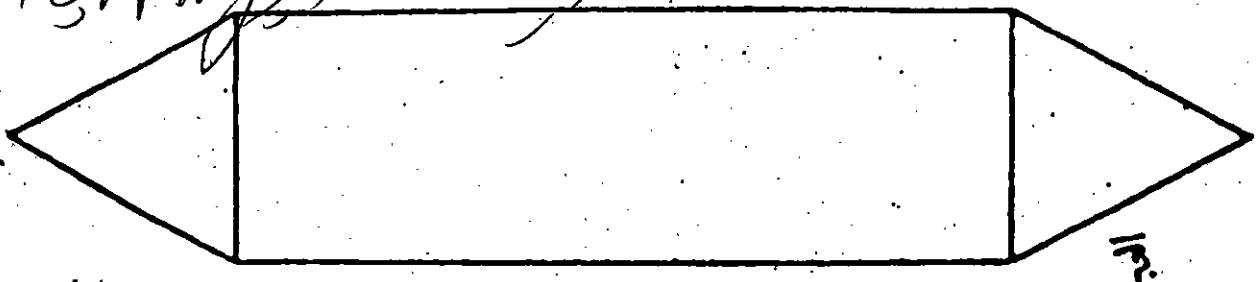
ATTESTED

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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
درجہ ملازمت	عارضی مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پیش کش کا مستحق ہے	تنخواہ بطور عارضی ملازمت	زائد تنخواہ زائد تنخواہ بطور قائم مقام	ماسوائے تنخواہ دیگر الاؤٹس	تاریخ تقرری	دستخط سرکاری ملازم
GHS, Jandala FR Tank			(2085-161-4480)				
	Off / Temp		RS. P.	RS. P.			
DO	DO		Rs. 2709/-			12/96	Jehangir Bhanu
-do-	-do-		Rs. 2870/-			12/97	Jehangir Bhanu
-do-	-do-		Rs. 3031/-			12/98	Jehangir Bhanu
-do-	-do-		Rs. 3192/-			12/99	Jehangir Bhanu
-do-	-do-		Rs. 3353/-			12/2000	Jehangir Bhanu
do	do		Rs. 3514/-			12/2001	Jehangir Bhanu
	Revised Pay						
	BPS 14 (3100-240-10300)		Rs. 5260/-			12/2002	Jehangir Bhanu
GHS, Jandala (FR) Tank			Rs. 5500/-			12/2002	Jehangir Bhanu

ATTESTED

Principal
GHS JANDALA
FR TANK

بعد التخصیب و غیر منسوب کسب و عمل کی طرف سے



طالعہ منجانب صاحب خان
بنام سکریٹری انکوائری

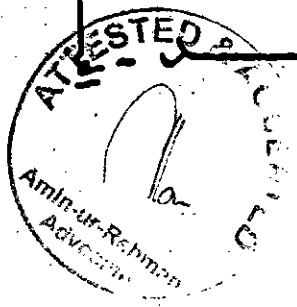
صاحب خان

مورد
مقدم
دعوی
مہتمم

باعث تحریر آنکہ

مقدم مذکور عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ آن مقام کے لئے آصف خان کے لئے اس کی کارروائی کا مکمل اختیار ہوگا۔ نیز صاحب موصوف کو مقدم کی کل کارروائی کا مکمل اختیار ہوگا۔ نیز دیکل صاحب کو کرنے راضی نامہ و تقریحات و فیصلہ برحسب دیے جواب دہی اور اقبال دعویٰ اور بصورت دگری کرنے اجراء اور وصول چیک و روپیہ اور مرضی دعویٰ اور درخواست ہرقسم کی تصدیق و فراہم پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا دگری کیفر یا اپیل کی برآمدگی اور سزا نیز دائر کرنے اپیل نگرانی و نگرانی پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدم مذکور کے کل یا جزوی کارروائی کے واسطے اور دیکل یا اختیار قانونی کو اپنے ہمراہ یا اپنی جگہ تعزیر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جلد مذکورہ بالا اختیارات حاصل ہو جائیں گے اور اس کا ساتھ پمداخت منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو فریڈ و ہرجانہ اتوائے مقدمہ کے سب سے ہوگا۔ اگلے کے مستحق دیکل صاحب موصوف ہوں گے۔ نیز بقایا و خرچ کی ذمہ داری کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاخیر پیش مقام ددرہ پیر پور یا عد سے باہر ہو تو دیکل صاحب پابند نہیں ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا ذکرات نامہ کھد یا کہ سند رہے۔

دعا کتبہ
ادھر کتبہ



المترجم
الح
ماہ مارچ
۱۹۶۷

صاحب خان
بنام ان
کے لئے منظور ہے۔
تصدیق و
مہتمم

لجدارت جناب سردس ٹرنپول جیب ڈیرہ العاملی حل

جہان زیب نام جیب سیرٹی ۲۶۴ کا ڈیرہ

مقدم نمبر $\frac{273}{16}$

جناب عالی :۔ اسلڈٹ سائل حسب ذیل عرض رسان ہے

یہ کم عتیقہ مقدم بلالہ علیہ آج تاریخ پیشی معور سے

چونکہ من اسلڈٹ سائل فرید بیروں مقدم ہینا رجا ہینا

اور اپنے مقدم کو والی لیتا ہوں اسنے مقدم صفحہ اول اسلڈٹ

بوجہ عدالت دائر کیا ہوا ہے۔ چونکہ من اسلڈٹ سائل کو ٹوری

پر بحال کر دیا گیا ہے اسنے مقدم کی باقی ضرورت نہ ہے

لجدارت عالیہ دعویٰ مقدم کو والی لینا چاہتا ہے

اور فرید بیروں ہینا رجا ہینا اسنے دعویٰ عدلی

خارج فرمایا جاوے $\frac{3}{15}$

جہان زیب خان - مسلڈٹ - عدلی - سائل

تہ
محمد
محمد