

Service Appeal No. 608/2016

31.07.2018

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Arguments heard and record perused.

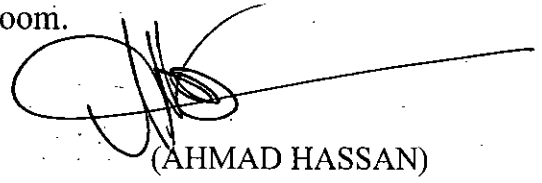
Vide our detailed judgment of today placed in connected Service Appeal No. 603/2013 "titled Mst. Shamia Bibi Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others respondents, the present appeal is accepted, the impugned order is set aside and the appellant is reinstated in service. However, the respondents are at liberty to conduct de-novo inquiry within a period of three months from the date of receipt of this judgment. The intervening period shall be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

31.07.2018



(MUHAMMAD HAMID MUGHAL)  
MEMBER



(AHMAD HASSAN)  
MEMBER

14.05.2018

The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come up on 31.07.2018.

  
READER

10/7/2018

learned counsel for the appellant present Mr. Kalimullah  
Shattak. Additional A/S for the respondents also present. Arguments  
heard and record perused.

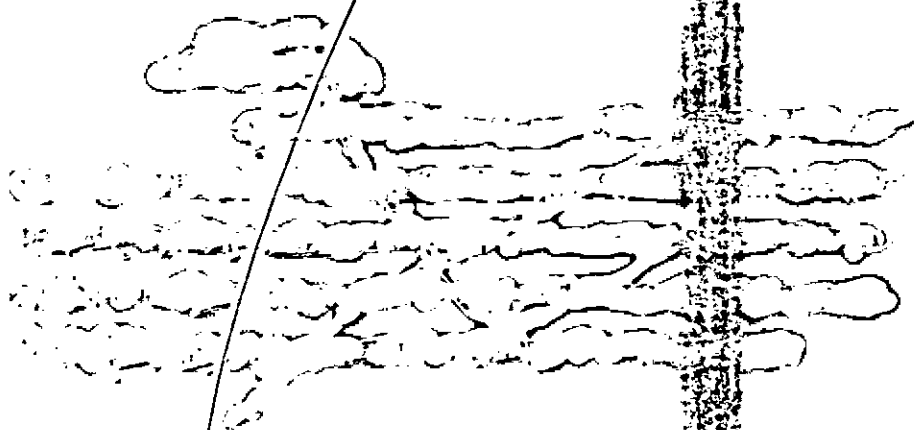
Vide our detailed judgment of today placed in connected  
Service Appeal No 603/2013 titled Mst. Nazma Bibi Versus  
Additional Agency, Binjira Officer, Govt & Central Kurram  
Sadda, Kurram Agency and three others. This appeal is also accepted  
as per detailed judgment rendered above. File is committed to the  
record room.

ANNOUNCED  
31-07-2018

  
(AHMAD HASSAN)  
MEMBER


(MUTAMMILAT SEWAJI)  
(MEMBER)

1/1/1



28.09.2017

None for the appellant present. Addl: AG alongwith Mr. Daud Jan, Supdt for respondents present. Written reply on behalf of respondents no. 3 and 4 not submitted despite repeated opportunities, therefore their right of defense is struck off. To come up for arguments on 27.12.2017 before D.B.

  
(Ahmad Hassan)  
Member

27.12.2017

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Addl: AG for the respondents present: Counsel for the appellant seeks adjournment. Adjourned. To come for arguments on 27.02.2018 before the D.B.

  
Member

  
Chairman

27.02.2018


Appellant with counsel and Additional AG alongwith Mr. Daud Jan, Superintendent for the respondents present. To come up for arguments alongwith connected appeal No. 603/2016 Mst. Shamia Bibi on 12.04.2018 before the D.B.

  
Member

  
Chairman

12.04.2018


Counsel for the appellant and Addl. AG alongwith Daud Jan, Superintendent for the respondents present. To come up for arguments alongwith connected appeal No. 603/2016 before the D.B on 14.05.2018.

  
Member

  
Chairman

03.05.2017

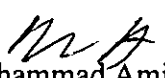
Clerk to counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl. AG for the respondents present. Written reply submitted on behalf of respondents No. 1 and 2. Cost of Rs. 100/- also paid and receipt thereof obtained from the learned counsel for the appellant. Remaining respondents written reply not submitted despite extension of last opportunity and cost of Rs. 100/-. Another last opportunity is extended subject to payment of further cost of Rs. 500/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments of respondents No. 3 and 4 and cost of Rs. 600/- on 13.07.2017 before S.B.

  
(Ahmad Hassan)

Member

13.07.2017

Clerk of the counsel for appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents also present. Written reply on behalf of respondents No. 1 & 2 have already submitted. Representative of respondents No. 3 & 4 are not in attendance nor written reply on their behalf submitted despite extension of last opportunity. Another last opportunity is extended subject to payment of further cost of Rs. 500/- which shall be borne by respondents No. 3 & 4 from their own pockets and notice be also issued to respondents No. 3 & 4 with the direction to direct their representatives to attend the court on the next date and submit written reply. To come up for written reply/comments and cost of Rs. 1100/- on behalf of respondents No. 3 & 4 on 28.08.2017 before S.B.

  
(Muhammad Amin Khan Kundi)

Member

22.12.2016

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. Last opportunity granted. To come up for written reply/comments on 30.01.2017 before S.B.

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

30.01.2017

Clerk counsel for appellant and Mr. Daud Jan, Superintendent alongwith Mr. Muhammad Adeel Butt, Additional AG for respondents present. Written reply by respondents not submitted despite last opportunity. Learned Additional AG requested for further time for submission of written reply. Last opportunity further extended subject to payment of cost of Rs. 100/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments positively on 14.03.2017 before S.B.

  
(ASHFAQUE TAJ)  
MEMBER

14.03.2017

Clerk to counsel for the appellant and Mr. Daud Jan, Sudpt. alongwith Addl. AG for respondents present. Written reply and cost not submitted by respondents. Representative of the respondent-department stated at the bar that case of the appellants for reinstatement in service was under process and would be finalized before the next date of hearing. Requested for adjournment. Request accepted. To come up for written reply/comments and cost on 03.05.2017 before S.B.

  
(AHMAD HASSAN)  
MEMER


14.06.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PST when removed from service vide impugned order dated 18.02.2016 on the allegations of willful absence where-against she preferred departmental appeal which was not responded and hence the instant service appeal on 07.06.2016.

That the appellant was not absent from duty as the alleged period of absence was period of vacation. That no enquiry in the prescribed manners was ever conducted.

Appellant Deposited  
Security & Process Fee

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 23.08.2016 before S.B. *23.08.2016*

  
Chairman

23.08.2016

Counsel for the appellant and Mr. Muhammad Numan, AO alongwith Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 3.11.2016 before S.B.

  
Chairman

03.11.2016

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 22.12.2016 before S.B.



  
Member

Form- A

FORM OF ORDER SHEET

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

Case No. 608/2016

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge or Magistrate  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1     | 07/06/2016                | <p>The appeal of Mr. Muzaffar Daud presented today by Mian Asif Amam 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;"><br/>REGISTRAR</p> |
| 2-    | 13, 6, 2016               | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>14-6-16</u></p> <p style="text-align: right;"><br/>CHAIRMAN</p>  |

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 608 of 2016

Mr. MUZAFFAR DAUD VERSUS Additional Agency  
Education Officer & others

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| 3.    | Addresses of the parties  |          | 8         |
| 4.    | Copy of the impugned order dated 18-02-2016 and show cause published notice " | "A & B"  | 9-10      |
| 5.    | Copy of Departmental appeal   | "C"      | 11-13     |
| 6.    | Copy of the salary bill   | "D"      | 14        |
| 7.    | Copies of the applications and departmental correspondences.                  | "E to H" | 15-<br>18 |
| 8.    | Wakalat Nama  | -        | -         |

Appellant

Through



MIAN ASIF AMAN

Advocate, High Court,

Peshawar

Off: T-30, 3<sup>rd</sup> Floor Bloor Plaza, Peshawar Cantt.

Cell # 0313-9185077.



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. ①

Service Appeal No. 608 of 2016

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 588

Dated 7-6-2016

MUZAFFAR DAUD CLASS IV, EX-CHOUKIDAR GOVERNMENT GIRLS PRIMARY  
SCHOOL MUZAFAR KOT, KURRAM AGENCY.

..... APPELLANT

VERSUS

- 1) ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL  
KURRAM, SADDA, KURRAM AGENCY.
- 2) DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT,  
PESHAWAR.
- 3) AGENCY ACCOUNT OFFICER KURRAM AGENCY.
- 4) GOVERNMENT OF KHYBER PUKHTOON KHWA, THROUGH  
SECRETARY EDUCATION, CIVIL SECRETARIAT, PESHAWAR.

..... RESPONDENTS.

APPEAL AGAINST THE OFFICE ORDER No 3374-78  
DATED 18-02-2016 PASSED BY RESPONDENT NO.1  
WHEREBY THE APPELLANT HAS BEEN REMOVED  
FROM SERVICE DUE TO LONG ABSENCE FROM DUTY.

PRAYER

ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED  
OFFICE ORDER NO 3374-78 DATED 18-02-2016 OF  
RESPONDENT NO.1 MAY KINDLY BE SET ASIDE AND THE  
APPELLANT MAY KINDLY BE ORDERED TO BE REINSTATE IN  
SERVICE WITH ALL BACK BENEFITS ACCORDING TO HIS  
SENIORITY.

Respectfully Sheweth:

- 1) That the Appellant Appointed in the year 2003 As Class IV,  
Choukidar Government girls primary school Muzafar Kot, Kurram  
Agency, and since then performed his duties with honesty and  
full devotion.

Filed to-day  
*[Signature]*  
Registrar  
7/6/16

- 2) That the Appellant was surprise and consternation came to know about his removal from service impugned order date 18-02-2016 and show cause notice published in daily news paper Mashriq on 02-02-2016, when the Appellant after winter vacation joined his duties. (Copy of the impugned order dated 18-02-2016 and show cause published notice are attached as Annexure "A & B").
- 3) That feeling aggrieved from the impugned order dated 18-02-2016 the Appellant preferred the departmental appeal. (Copy of Departmental appeal is enclosed as Annexure "C").
- 4) That the departmental appeal has not been answered and decided despite the lapse of statutory period of time, therefore, Appellant filed present appeal against the impugned order dated 18-02-2016 of respondent No.1, which is against the law, facts and principles of justice on the following grounds inter-alia:

**GROUNDS:**

- A. That the impugned order is based on malafide, ill will, retribution, illegal and void abi-intio.
- B. That exparte action has been taken against the Appellant and they been condemned unheard.
- C. That no charge sheet and show cause notice were issued to the Appellant.
- D. That the Appellant are serving with all Zest and Zeal with the entire satisfaction of his superiors, performed his duties with religious devotion, therefore, never ever absented from his official duties, which further established from the contents of the attendance registered maintained by the High School which presumption of accuracy and truth is extended, it is pertinent to mentioned here that the said registered of attendance not maintained in the

primary school, where by the head master checked the attendance of Class IV employees.

- E. That Appellant punctual and regular throughout his duties, and never ever absented from his service, which facts further evident from his pay bill was received Appellant every month, had the Appellant been absentees would the respondent No 1 had prepared his salary bills. (Copy of the salary bill attached as annexure D).
- F. That it is important to mention here that during the last few years most of the WATCH MAN/CHOUKIDAR had become unable to perform his duties due to the worse situation in Kurram Agency, the militants factor as well as sectarian factors (Shia & Sunni) also involved. And in the situation the political administration made some decision for improvement law & order situation as per rewaj and custom in the area, which was agreed the Political Agent Kurram Agency and the respondent No 1, whereby when sectarian urgency came in sunni area the shia employee not performed their duties and in shia area the sunni employees not performed their duties until the situation in control, but in these worst situation the Appellant perform his duties as per decided rewaj but the respondent No1, treated the Appellant discriminated.
- G. That malafide of the respondent No 1 is overtly established from the factum that against the dishonest conduct of the respondent No 1, the appellant & Other Colleague had moved applications prior to issuance of impugned order dated 18-02-2016, wherein serious charges of corruption

misconduct were raised before competent authority. (Copies of the applications and departmental correspondence attached as annexure E, F, G, & H).

- H. That the malafide and ill will of respondent No 1 was so high peak that he in winter vacation issued show cause notice through publication daily Mashriq and thereafter removal order were also made in winter vacation, whereof Appellant were not in knowledge, this all smacks of retributive intentions and overt malafide on the respondents.
- I. That as affirm above the winter in Kurram agency is most severe, further more the Appellant leave in scattered far long villages, therefore, Appellant could not get any knowledge of impugned proceeding initiated at the back of ht Appellant malafidely, hence due to explained reason the Appellant could not submits replies of show cause notice.
- J. That ulterior motive of the respondents No 1 self evident from the fact that show cause notices issued through publication against 53 persons but removal impugned order were passed in reference of 17 persons including Appellant, meaning thereby that all those who greased the palms of respondent no 1 were left off the hock, and those who did not obliged him were removed from services just to satisfied personal vendetta of respondent No 1, and more astonished the impugned order dated 18-02-2016 against the facts and ground reality, because one iqbal hussain at serial No 9 impugned order already retired a year ago and received his pension benefit, and not aware the posting of the Appellant.

- K. *That allegation of the absentee is not corroborated by the official record or any medium of unimpeachable evidence, hence alleged charges baseless and void liable to be struck down.*
- L. *That the Appellant have been condemned unheard in contravention of salutary doctrine of "Audi alterm partum".*
- M. *That no inquiry has been conducted to prove the allegations before awarding the major punishment which this amounts to major deviation from the rules of service laws, hence impugned order is not sustainable in the eye of law.*
- N. *That before taking such drastic penal action respondent No 1 did not take pain to seek factual input from concerned headmaster/principal who is immediate officer, this all reflects that all the impugned proceedings were made in cursory and slipshod hasty manner without following the rules and regulations showing some personal interest of respondent no 1.*
- O. *That under the law the show cause notice must be issued to every official but herein joint show cause with blanket allegations have been made followed by one pen stroke removal from services impugned order has never been intention of law, needs to be struck down.*
- P. *That any other grounds will be raised at the time of the arguments with prior permission of this Honorable Tribunal.*

6

It is, therefore, prayed that On acceptance of this appeal, the impugned Office order No 3374-78 dated 18-02-2016 of Respondent No.1 may kindly be set aside and the Appellant may kindly be ordered to be reinstate in service with all back benefits according to his seniority

Dated 06-06-2016

Through

Appellant



**MIAN ASIF AMAN**

Advocate, High Court,

Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. \_\_\_\_\_ of 2016

Mr. MUZAFFAR DAUD VERSUS Additional Agency  
Education Officer & others

AFFIDAVIT

I, MUZAFFAR DAUD CLASS IV, EX-CHOUKIDAR GOVERNMENT GIRLS PRIMARY SCHOOL MUZAFAR KOT, KURRAM AGENCY, do hereby solemnly affirm and declare on oath that the contents of this Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

ATTESTED



DEPONENT.

مظفر داود

Identified by

MAIN ASIF AMAN

Advocate Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. \_\_\_\_\_ of 2016

Mr. MUZAFFAR DAUD VERSUS

Additional Agency  
Education Officer & others

Address of the parties

APPELLANT

MUZAFFAR DAUD CLASS IV ,EX-CHOUKIDAR GOVERNMENT GIRLS PRIMARY SCHOOL MUZAFAR KOT, KURRAM AGENCY

RESPONDENTS.

- 1) ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL KURRAM, SADDA, KURRAM AGENCY.
- 2) DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT, PESHAWAR.
- 3) AGENCY ACCOUNT OFFICER KURRAM AGENCY.
- 4) GOVERNMENT OF KHYBER PUKHTOON KHWA, THROUGH SECRETARY EDUCATION, CIVIL SECRETARIAT, PESHAWAR.

Dated 06-06-2013

Through

Appellant



MAIN AISF AMAN

Advocate, High Court,  
Peshawar.





ADD. AGENCY EDUCATION  
OFFICE SADDA KURRAM AGENCY

No: 3374-78/Edu

Dated Sadda the 18/02/2016

REMOVAL FROM SERVICE

On the fulfilling of all codal formalities the following teachers/Class/lvs are hereby removed from their service due to their long absence from duty with immediate effect.

Note: Entry to this effect should be made in their service books.

| S# | Name           | Desig   | School              |
|----|----------------|---------|---------------------|
| 1  | Sadiqa         | PET     | GGMS Bilyamin       |
| 2  | Maryam Farooq  | CT      | IHC Gogani          |
| 3  | Shehnaz        | TT      | GGPS Barari         |
| 4  | Abida Nawaz    | AT      | GGMS Tindo          |
| 5  | Farah Deeba    | PST     | GGPS Bagzai         |
| 6  | Shamia Bibi    | PST     | GGMS Badama         |
| 7  | Irfanullah     | PST     | GPS Hamish Gul Kali |
| 8  | Latif Shah     | PST     | GPS Had Malla       |
| 9  | Iqbal Hussain  | PST     | GHS Bilyamin        |
| 10 | Basim Khan     | Peon    | GHS Shah Ibrahim    |
| 11 | Samad Hussain  | Ch      | GPS Talo Kunj       |
| 12 | Muzafar Dawood | Ch:     | GGPS Muzafar Kot    |
| 13 | Sher Muhammadi | Ch:     | GHS Dogar           |
| 14 | Fazal Rehman   | Behish: | GHS Dogar           |
| 15 | Awal Shah      | Ch:     | GPS Mirdo Tang      |
| 16 | Zainullah      | Swp:    | GHS Paloseen        |
| 17 | Sulaiman       | N/Q     | GHS Paloseen        |

Add: Agency Education Officer  
Lower & Central Kurram Sadda

NO: 3374-78/Edu dated 18/02/2016

Copy for information to the

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Agency Account Officer Kurram Agency.
4. Head Masters / Teachers Concerned.

Add: Agency Education Officer  
Lower & Central Kurram Sadda

**ATTESTED**



Office copy ①

مفتی صاحبی دانشمند علامہ امجد علی امجدی

Ammeure

مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ  
"مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ"

(11)

مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ

مفتی امجد علی امجدی

① یہ کہ استدعا ہے کہ فرمائے کہ "مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ"

② یہ کہ استدعا ہے کہ فرمائے کہ "مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ"

③ یہ کہ استدعا ہے کہ فرمائے کہ "مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ"

④ یہ کہ استدعا ہے کہ فرمائے کہ "مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ"

⑤ یہ کہ استدعا ہے کہ فرمائے کہ "مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ"

(Remove order is attached)

⑥ یہ کہ استدعا ہے کہ فرمائے کہ "مفتی امجد علی امجدی صاحب مدظلہ العالی سے استدعا ہے کہ فرمائے کہ"

ATTESTED

مفتی امجد علی امجدی

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ATTESTED

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Handwritten text, possibly a name or title, starting with a circled number 11.

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(Attestation of newspaper attached)

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Handwritten text, possibly a name or title, starting with a circled number 12.

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Handwritten text, possibly a name or title, starting with a circled number 12.

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Amease D<sup>9</sup>

S#: 1

Kurram at Ara C

P Sec:001 Month:January 2016  
KM1118 -ADDITIONAL AGENCY EDU OF  
Min. Of K.A & N.A & S.F.R

Pers #: 00675597 Buckle:  
Name: Muzafar Daud  
CHOWKIDAR  
CNIC No.2130274200507  
GPF Interest Free  
02 Active Temporary

NTN:  
GPF #: 14  
Old #: 30274200507

KM1118 -LK

PAYS AND ALLOWANCES:

|                                |           |
|--------------------------------|-----------|
| 0001-Basic Pay                 | 8,975.00  |
| 1000-House Rent Allowance      | 910.00    |
| 1210-Convey Allowance 2005     | 1,785.00  |
| 1300-Medical Allowance         | 1,500.00  |
| 1516-Dress/ Uniform Allowance  | 100.00    |
| 1528-Unattractive Area Allow   | 747.00    |
| 1567-Washing Allowance         | 100.00    |
| 1948-Adhoc Allowance 2010@ 50% | 1,867.00  |
| 2148-15% Adhoc Relief All-2013 | 1,015.00  |
| Gross Pay and Allowances       | 18,573.00 |

DEDUCTIONS:

|                                |        |        |
|--------------------------------|--------|--------|
| GPF Balance 13,118.00          | Subrc: | 482.00 |
| 3661-E.E.F (Exchange)          |        | 50.00  |
| 3701-Benevolent Fund(Exchange) |        | 120.00 |
| 3704-Group Insurance(Exchange) |        | 58.00  |
| 3711-Addl Group Insuranc(Exch) |        | 3.00   |

Total Deductions 713.00

17,860.00

D.O.B 03.04.1984 LFP Quota:  
12 Years 05 Months 005 Days NATIONAL BANK OF PAK  
1752-6

**ATTESTED**



Kurram at Ara C

S#: 2

P Sec:001 Month:January 2016  
KM1118 -ADDITIONAL AGENCY EDU OFF  
Min. Of K.A & N.A & S.F.R

Pers #: 00675597 Buckle:

Name: Muzafar Daud

NTN:

CHOWKIDAR

GPF #:

CNIC No.2130274200507

Old #: 30274200507

GPF Interest Free

02 Active Temporary

KM1118 -LK

PAYS AND ALLOWANCES:

2174-Adhoc Relief Allow-2014

677.00

2199-Adhoc Relief Allow @10%

897.00

Gross Pay and Allowances

18,573.00

DEDUCTIONS:

GPF Balance 13,118.00

Subrc:

Total Deductions

713.00

17,860.00

D.O.B:

LFP Quota:

03.04.1984

NATIONAL BANK OF PAK

12 Years 05 Months 005 Days

1752-6

ATTESTED





FATA SECRETARIAT  
DIRECTORATE OF EDUCATION

Warsak Road Peshawar

No. \_\_\_\_\_ dt: 03/08/10

A-12/Majid Gul I/C H/M

To

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Subject: COMPLAINT/ENQUIRY  
Memo

I am directed to enclose herewith a copy of the complaint received in this office against Mr. Majid Gul SET working as I/C Headmaster GHS Minatoo, Kurram Agency and to submit that Mr. Majid Gul SET working as AAEO Lower/Central Kurram Agency was transferred to GMHS Sadda vide this Directorate Endst: No. 11224-29 dated 18-7-2009. As per report of the Principal GMHS Sadda Kurram Agency, the above named teacher does not perform duties regularly (Copy enclosed) and his pay has been stopped vide this Directorate Endst: No. 7528 dated 31-5-2010 (Copy enclosed) while working as AAEO Lower Kurram, he was allegedly involved in financial corruption and irregular deduction of monthly salaries from the female community school teachers (Copies of complaint attached).

In view of the above, it is requested that disciplinary action may be initiated against the accused teacher being an employee of provincial cadre under intimation to this office.

SI —  
DY: DIRECTOR EDUCATION  
FATA SECRETARIAT PESHAWAR

Endst: No. 11665-30 /

Copy forwarded to:-

- 1 Addl: AEO, Lower/Central Kurram
- 2 ✓ Principal GMHS Sadda, Kurram Agency
- 3 P.A to D.E FATA

  
DY: DIRECTOR EDUCATION  
FATA SECRETARIAT PESHAWAR

**ATTESTED**





جناب والا شان ایڈیشنل چیف سیکرٹری فانا

درخواست برائے کارروائی طلباء کی حالت پر رحم کرنا

اور مجید گل SET کے خلاف کارروائی کرنا

~~Amme~~  
Amme  
F  
16

جناب والا شان: شائد آپ کے علم میں ہوگا کہ مجید گل صدر دفتر میں AAEO پوسٹ پر تھا اور انچارج ایڈیشنل AAEO بھی تھا 18 مارچ 2015ء کا تبادلہ گورنمنٹ میں  
سکول لیکن بحیثیت SET کیا گیا ہے۔ مورخہ 25/04/2015 تک اس نے سکول کا شکل تک نہیں دیکھا ہے۔ جو ہمارے بچوں کے ساتھ سخت نا انسانی اور ظلم ہے۔ مجید گل  
پہلے سے عادی ہے۔ بطور ثبوت اس کا سابقہ ریکارڈ پیش کرنا چاہتا ہوں۔

(۱) 2009 میں ایجوکیشن آفس صدر دفتر سے مجید گل کا ٹرانسفر GMHS صدر بحیثیت SET کیا گیا تو وہ دیوبند سے فنانس رہتا تھا آخر کار پرنسپل صدر دفتر  
نمبر 60 dated 06/03/2015 INO کے غیر حاضری کے خلاف ڈائریکٹر ایجوکیشن فانا کو خط لکھا گیا (خط تھیں ہے) صفحہ 2

(۲) اسکے بعد وہ ایس صدر دفتر میں آنے کا کوشش کر رہا تھا۔ اور گمنام ڈائری کرنے کا سہارا لیا ایڈیشنل ایجوکیشن آفس نے ایک بار پھر اسکے خلاف ڈائری ایجو  
کیشن فانا کو ایک خط نمبر: NO: 709-11 dated 03/05/2010 کے ذریعے آگاہ کیا۔ (خط تھیں ہے) صفحہ 3

(۳) ڈائریکٹر ایجوکیشن فانا نے اسکے خلاف ڈائری ایڈیشنل ایجوکیشن آفس پر پختوان خواہ کو ایک خط نمبر NO: 11665-66 dated  
03/08/2010 کے ذریعے کارروائی لینے خط لکھا (خط تھیں ہے) صفحہ 3

جناب والا شان:

مجید گل کو ایک بار پھر سیاسی پشت پناہی حاصل ہوئی کارروائی تو دور کی بات۔ اس کو ایک بار پھر ایڈیشنل AEO مقرر کیا۔ اور دو (2) سالوں

میں اس نے لوڈ سنٹرل گورنمنٹ کے تقابلی ڈھانچے کو کروڑوں کے عوض اتناہ کیا۔ اساتذہ کو گھروں سے بھاگ کر فنی فنی تنخواہ پر مجبور کرتا تھا۔ وہ درجی گزرا اب ایک دفعہ پھر اس کو حالی  
سکول لیکن تبدیلی کیا گیا تو تباہی کی باری حالی سکول لیکن کو نصیب میں ملی، اور یہی سب کچھ پورا کیا جاتا گا۔

جناب والا شان: ہماری بچوں پر رحم فرما کر اس انسان کو KPK میں کسی پرنسپل کو حوالہ کر کے دیوبند کا عادی بنایا جائے

گزارش ہے

تاریخ 25/04/2015

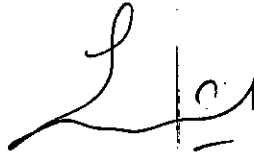
العارضین

اہلیان لیکن گورنمنٹ ایجنسی

خط کی نقل بھیجی گئی

- |     |                        |     |                                  |
|-----|------------------------|-----|----------------------------------|
| (۱) | ڈائریکٹر ایجوکیشن فانا | (۲) | سیکرٹری سوشل سیکرٹری             |
| (۳) | پولیسکل ایجنٹ گورنمنٹ  | (۴) | اسسٹنٹ پولیسکل ایجنٹ لوڈ گورنمنٹ |

ATTESTED



بخدمت جناب ایڈیشنل چیف سیکرٹری فنانس سیکرٹریٹ

اپیل برائے فراہمی انصاف اور کمیونٹی سکولوں کے

خواتین، حضرات ٹیچرز کو مئی 2013ء سے ریگولر کرنا۔

Amear  
167

جناب والا: جیسا کہ آپ کو معلوم ہے کہ 15 سال قبل فنانس بشمول گرام پبلسی کمیونٹی سکولوں کا قیام عمل میں آیا تھا۔ اس دوران کئی بار سکولوں کو دوران کے اساتذہ کو ختم کر کے پھر بحال کر کے آکھ چھوٹی جاری تھی حتیٰ کہ اس پر احتجاج کا سلسلہ اسلام آباد تک جا پہنچا آخر کار گورنر جنرل بخون خواہ اس میں فنانس سیکرٹریٹ کے ذریعے ایک فرمان جاری کیا گیا (No. So(E)/SSD/CSTR/99/108/1) کہ تب تک تازہ بھرتی پر پابندی ہوگی جب تک کمیونٹی سکولوں کے تمام اساتذہ ریگولر نہ ہو اور اس میں یہ شرط بھی تھی کہ سب سے پہلے لوکل پھر نان لوکل کو ریگولر کیا جائے (فنانس سیکرٹریٹ خط تھی ہے)

جناب والا: سابقہ ایڈیشنل AEO حاجی معین گل صاحب نے ایمانداری کر کے تقریباً تمام لوکل اساتذہ کو ریگولر کر دیا۔ جبکہ نان لوکل کیلئے کوئی خالی پوسٹ نہ رہا۔ مگر تسلی دی کہ خالی پوسٹ آنے والے ہیں اس دوران حاجی معین گل صاحب کا تبادلہ کر دیا گیا اور اسکی جگہ مجید گل ایڈیشنل AEO مقرر ہوا۔ مختصراً ایک ماہ بعد بہت زیادہ PTC پوسٹ ایجوکیشن آفس صدر کو مل گئے۔ جس پر پہلے پراجیکٹ ٹیچرز کو ریگولر کر دیا جبکہ تقریباً 35 پوسٹ بقایا رہ گئے۔ اور کئی IPTC اساتذہ کا 2012ء انٹرویو میں CT پوسٹ پر تعیناتی ہوئی ان کے سیٹ بھی خالی ہو گئے دو (2) ماہ بعد ہمیں خبر ہوئی کہ خالی پوسٹوں پر غیر قانونی اور خفیہ طریقے سے تعیناتی شروع ہے۔ جس کیلئے ہم نے بطور خدشہ ایڈیشنل چیف سیکرٹری کو ایک خط بھی لکھا (جسکی کاپی درخواست ہذا اسکا تھ لف ہے) مگر کسی نے کوئی کان نہیں ڈہرایا۔

اب خدشات درست ثابت ہوئے مجید گل صاحب (فرعون۔ ظالم) نے اقرباء پروری اور ظلم کی انتہا کر کے ہماری حق پر ڈاک ڈال کر لوگوں سے کروڑوں میں رشوت لیکر ہمارا حق چھین لیا۔ اور خود کروڑوں کا مالک بن کر اپنے گاؤں میں شاہانہ طرز مکان تعمیر کیا اپنے بیٹے کیلئے مبلغ میں (20) لاکھ پر قطر یا سعودیہ کا دیزل خرید کر بیرون ملک بھیج دیا۔ ہم ابھی تک در بدر لڑ رہے ہیں آخر کار ہم نے فیصلہ کیا کہ ایک دفعہ پھر ہم آپ صاحب کے سامنے یہ فریاد رکھنا چاہتے ہیں

(1) کہ ہمیں مئی 2013ء سے ریگولر کر دیا جائے

(2) جن لوگوں کو غیر قانونی حق دیا ہے ان کو ترمیم کر کے ہمارے لئے پوسٹیں خالی کئے جائے

(3) ظالم کو غیر تانک سزا دیا جائے تاکہ مستقبل میں کوئی اور ایسا جرات نہ کر سکے۔ بصورت مجبوری عدالت کے دروازے پر مظلوم کیلئے کھلنے ہیں

العازم یحسین نان لوکل کمیونٹی سکول ٹیچرز

(1) سومیہ رٹمن NIC: 17101-344927-6 (2) حویرا ٹمن NIC: 17101-8561110-8 (3) گوہر سیما ب NIC: 14203-4789022-4

(4) نسیم خاتون NIC: 16201-6629858-4 (5) نازیہ خاتون NIC: 14203-8724258-2 (6) حلیمہ (7) سیما (8)

کوثر فرید NIC: 17101-1397459-6 (9) نور جہان NIC: 142032798389-2 (10) غوثیہ افضل (11) داغدی بی NIC: 16202-4256650-0

(12) راحت جان NIC: 17101-0292256-4 (13) رفعت ناز NIC: 142031984611-2 (14) رویہہ NIC: 17101-0313917-6

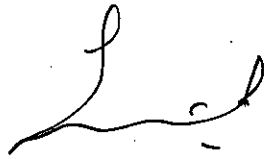
(15) یاسمینہ (16) سیما گل NIC: 17201-5095077-4 (17) ناز بی (18) راحت نذیرہ NIC: 17101-4189294-6

(19) فضیلت NIC: 16102-2219600-0 (20) سوریہ NIC: 17101-8617813-2

اس درخواست کی کاپی مندرجہ ذیل کو بھیج دی گئی۔

(1) پولیٹیکل ایجنٹ گرام (2) ڈائریکٹر ایجوکیشن فنانس سیکرٹریٹ پشاور

ATTESTED



# ALL G.T., P.E.T., DM. TEACHERS ASSOCIATION

Lower Kurram & Central Kurram Agency. Ph:520744  
Head Office: Sadda Kurram Agency.

1. President:  
Mr. Mohammad Ishaq Khan  
M.A., B.Ed, C.T.
2. Vice President:  
Mr. Mohammad Rafiq Orakzai  
M.A., B.Ed, C.T.
3. General Secretary:  
Mr. Khan Gul  
M.A., M.Ed, C.T.
4. Joint Secretary:  
Mr. Tariq Mahmood  
M.A., P.E.T
5. Finance Secretary:  
Mr. Qasim-ud-Din  
M.Sc, B.Ed
6. Press Secretary:  
Mr. Abdul Qadir  
M.A., B.Ed, C.T

Handwritten notes and signatures in the top right corner, including the word "Signature" and a circled number "18".

## EXECUTIVE COMMITTEE:

1. Mr. Nisar Mohammad  
C.T. G.H.S., Bagam
2. Mr. Mohammad Hakim  
C.T. G.H.S., Uchat
3. Mr. Abdul Jalil Khan  
C.T. G.H.S., Manatoo
4. Mr. Mohammad Itaf  
C.T. G.M.H.S., Sadda
5. Mr. Mohammad Tahir  
D.M. G.M.S., Arawali
6. Mr. Mohammad Zubair  
C.T. G.H.S. Badama
7. Mr. Adil Bad Shah  
P.E.T. G.M.S Tarali
8. Mr. Hazrat Khan  
C.T. G.H.S., Angori Ck
9. Mr. Fazal Hamid  
D.M. G.M.S. Baza Ck
10. Mr. Amir Rehman  
D.M. G.M.S., Tarali
11. Mr. Ahmad Khan  
C.T. G.H.S., Angori

دفعہ نمبر 1912 کے تحت جاری شدہ نصاب اور  
 25403000  
 6000000 = 20 x 300000  
 228000 = 19 x 12000  
 275000 = 55 x 5000  
 500000 = 1000 x 500  
 5500000 = 50000 x 110  
 12100000  
 25403000

نصاب فاؤنڈیشن اسکول کے علاوہ مذکورہ آفسس نے اپنے قیام کے لیے مقررہ مکان 1912 جس پر تعمیر کیا گیا ہے اس کے بارے میں  
 مکان 1912 جس پر تعمیر کیا گیا ہے اس کے بارے میں  
 مکان 1912 جس پر تعمیر کیا گیا ہے اس کے بارے میں

ATTESTED

Handwritten signature below the attestation stamp.

صناب دلا اسکے بارے میں کئی بار ڈائریکٹر کو بھی آگاہ کیا  
سٹیٹ ٹریڈ اینڈ اینڈریسمنٹ ڈیپارٹمنٹ کو بھی آگاہ کیا مگر ابھی تک  
افسر مزے اڑا رہے ہیں اور اس میں اس کے ساتھی اور لوگ  
بھی ملوث ہیں

لہذا درخواست کی جاتی ہے کہ مزبورہ افسر مجید گل کو گرفتار  
کر کے اس کے خلاف کارروائی عمل میں لائی جائے اور حکام  
یکمیز سے جتنا حال کھا رہا ہے۔ وہ سبھی کی درخواست ہے

آپ امیداً آفری کریں گے

عین لائن میں ہوگی

5-1-2014

نقل درخواست بھیجی گئی

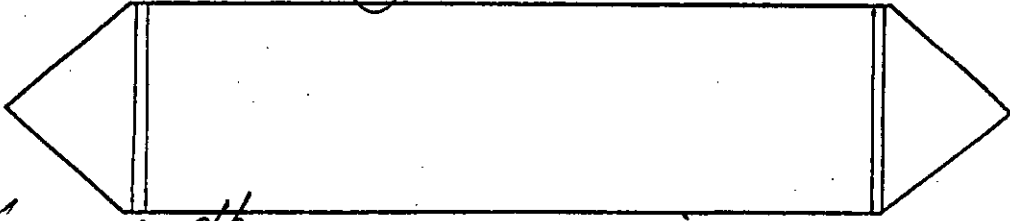
ڈائریکٹر جنرل نیٹب NAB اسلام آباد

از گلبرگ پاکستان

ATTESTED

رنگ

بعدالت صفا - سرسوں کے لیے درخواستی کارروائی



کونسی ایجنسی کے لیے درخواست ہے

20/6

مظفر داؤد سائبر وولڈر بنام  
ڈو اعانت آرازا پانڈی سولی مظفر داؤد  
آزم ایجنسی

موزخہ 6  
مقدمہ  
دعویٰ سرسوں کے لیے  
جرم

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کارروائی متعلقہ

آن مقام کیلئے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک درو پیہا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 6 ماہ جون 20

بمقام کے لئے منظور ہے۔