

23.08.2019

Counsel for the appellant present.

Learned counsel argued the matter at some length and when confronted with the position that departmental appeal was submitted by the appellant before an official who passed the impugned order dated 06.04.2019, requested for withdrawal of instant appeal in order to approach the competent departmental authority for the purpose. He is also of the view that the impugned order was void ab-initio as appellant was transferred as punishment, the period of limitation should not hamper the proceedings before the departmental appellate authority. Order accordingly.

The appeal is dismissed as withdrawn. File be consigned to the record room.





Chairman

ANNOUNCED
23.08.2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 984/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/07/2019	<p>The appeal of Mst. Shabana Naz resubmitted today by Mr. Shariyar 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 29/7/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23-8-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

MST. SHABANA NAZ

VS

DISTRICT EDUCATION OFFICER MARDAN

Your No: 1230 dated: 19.7.2019

Respected Sir,

Resubmitted after completion.

SHAHRIYAR ADVOCATE
MARDAN


29/7/2019

The appeal of Mst. Shabana Naz, Sr. Arabic Teacher GGHS Mahoo Dheri Mardan received today, i.e. on 18-07-2019 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be properly flagged.
- ② Annexures must be in sequence.
- 3- Annexures attached with appeal must be attested.
- 4- Annexures A & C are illegible which must be replaced with legible/better one.
- 5- Affidavit must be attested by Oath Commissioner.
- 6- Copies of annexures should also be attached with spare copies.

No. 1230 /S.T,

Dt. 19-7- /2019


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shahriyar Khan,
Adv, Mardan.

BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNAL

PESHAWAR

Appeal No 984 2019

Mst Shabana Naz

Senior Arabic Teacher (S.A.T) BPS-16

Government Girls High School (GGHS)

Mahoo Dheri Mardan

..... (Petition)

VERSUS

1. District Education Officer, District Mardan

..... (Respondents)

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Date: 18/7/2019

Applicant

Through Counsel
SHABAN NAZ OF HOTTI
Advocate High Court
at District Courts Mardan

BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNAL

PESHAWAR

Appeal No 984 2019

Mst Shabana Naz
Senior Arabic Teacher (S.A.T) BPS-16
Government Girls High School (GGHS)
Mahoo Dheri Mardan

Khyber Pakhtukhwa
Service Tribunal
Diary No. 1014
Dated 18/7/19

..... (Petitioner)

VERSUS

1. The In charge Headmistress , Govt Girls Hight School Mahoo Dheri Mardan
2. District Education Officer (F) Mardan
3. District Nazim Mardan
4. Director Education KPK, Peshawar
5. The Govt of KPK Through Chief Secretary
Civil Secretariat Peshawar

..... (Respondents)

Filed to-day
Reew
Registrar
18/7/19

1. APPEAL UNDER SECTION-4 OF SERVICES TRIBUNAL ACT 1976, AGAINST THE ORDER DATED 06/04/2019 ANNEXURE A ISSUED BY RESPONDENT NO 2 WHERE BY PERSONAL MALICE WITH MALAFIDE INTENTION, ILLEGALLY AND WITHOUT JUSTIFICATION WITHHELD THE INCREMENT OF APPELLANT & AS A PUNISHMENT TRANSFERRED HER FROM MAHOO DHERI TO GHALA DHER

Re-submitted to-day
and filed.
Reew
Registrar
29/7/19

PRAYERS:

On accepting this appeal the impugned order dated 06/04/2019 being passed for personal malice with malafide intention being illegal and without justification may graciously be set aside and the stopped increment be restored and appellant to be retained at her present post at Mahoo Dheri, meanwhile operation of the impugned order be suspended till the disposal of stay application.

GRUNDS FOR APPEAL:

Respectfully sheweth;

The petitioner humbly submits as under;

1. That the petitioner was appointed as senior Arabic Teacher (SAT) in the year 2007 and since then performing her duties whole heartedly committed and for the entire satisfaction of her high-ups and welfare of the students.
2. That on 13/02/2019 the petitioner was seriously ill and applied for one day casual leave which was not recommended by the respondent No: 1 (in charge Headmistress) G.G.H.S Mahoo Dheri Mardan. On the next day i.e on 14/02/2019 the petitioner sent another Performa for one day casual leave to the office of respondent No:2 (D.E.O) Female Mardan which was returned un approved (copy attached as annexure B)
3. That against the said behavior of the respondent No 1 (The in charge Headmistress of the school) a complaint was filed before respondent No2 (D.E.O) Female Mardan but of no consequences (Copy attached as annexure No D)
4. That on 21/03/2019 the petitioner was directed to attend the office for respondent No2 for personal hearing on 28/03/2019 and on the same date the petitioner was called and without hearing inflicted certain punishment upon me. (copy is attached as annexure E)
5. That on 06/04/2019 the respondent NO2 (D.E.O) Female Mardan vide his office No 2819/D/PF, the petitioner was imposed Penalty of stoppage of one increment for two years and as punishment / penalty transferred from G.G.H.S Mahoo Dheri Mardan To G.G. H.S Ghala Dher Mardan (copy is attached as annexure A)

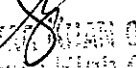
6. That on 01/04/2019 the **DISTRICT NAZIM** has already imposed complete ban on transfer in education Department including other departments, the Dependent No2 did not bother about it. (copy attached as annexure 4)
7. The dependant has charged the appellant on the ground of misconduct while the absence ^{on} of casual leave does not come within the ambit of misconduct.
8. The appellant is charged under double jeopardy as one increment is stopped for two years and other is transferred as a punishment from G.G.H.S Maho Dheri to G.G.H.S Ghala Dher which is against the constitution and law.
9. That the punishment awarded and transfers as well as against the mandate of disciplinary rules & justice.
10. That the appellant preferred ^{an} on appeal before the D.E.O (F) Mardan on 14/04/2019 but of no avail (copy is attached as annexure).
11. That no proper inquiry has been conducted before inflicting the punishment against the appellant.
12. That the punishment order is not speaking order.

It is therefore humbly prayed that the impugned order may kindly be set aside by restoring the stop increment and retained the appellant on her present post at G.G.H.S Mahoo Dheri. Apart from this any other relief which the Honorable Tribunal may deem fit and proper may also be granted.

Appellant


Shaban Naz (S.A.T)

Through Counsel


SHABAN NAZ (S.A.T)
Advocate High Court
at District Courts Mardan

BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNALPESHAWAR

Appeal No _____ 2019

Mst Shabana Naz
 Senior Arabic Teacher (S.A.T) BPS-16
 Government Girls High School (GGHS)
 Mahoo Dheri Mardan

..... (Petitioner)

VERSUS

District Education Officer (F) Mardan etc

..... (Respondents)

ADDRESSES OF THE PARTIESAppellant

Shabana Naz D/O Muhammad Yousaf (S.A.T) at G.G.H.S Mahoo
 Dheri Mardan, R/O Mohabbat Abad, Mardan

Respondents:

1. The In charge Headmistress , Govt Girls High School Mahoo Dheri Mardan
2. District Education Officer (F) Mardan
3. District Nazim Mardan
4. Director Education KPK, Peshawar
5. The Govt of KPK Through Chief Secretary
 Civil Secretariat Peshawar

Date: 18 / 7 / 2019

through
 Signature of Counsel
 Adv. Govt High Court
 at District Courts Mardan

Appellant
 Through Counsel

BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNAL PESHAWAR

Appeal No _____ 2019

Mst Shabana Naz
Senior Arabic Teacher (S.A.T) BPS-16
Government Girls High School (GGHS)
Mahoo Dheri Mardan

..... (Petition)

VERSUS

District Education Officer (F) Mardan etc

..... (Respondents)

The application for seeking suspension of operation of the impugned order dated 06/04/2019 passed by respondent No2 whereby the appellant has been transferred from Maho Dheri to Ghala Dher and stoppage of increment till final disposal of the accompany appeal.

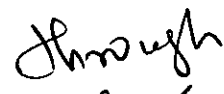
Respectfully Sheweth; The appellant submit as under:

1. That the applicant is filing the attached appeal in this Honorable Tribunal.
2. That the applicant has got a good Prima facia case and is confident of its success.
3. That the applicant will suffer an irreparable loss if implementations of the impugned order of respondent No2 are not suspended.
4. That the balance of convenience is in favor of applicant.

It is therefore humbly prayed that the implementation of the impugned order of respondent No2 may graciously be suspended till final disposal of the appeal meanwhile status quo be granted till the final decision of the petition.

Date: 18 / 7 / 2019


Applicant


SHAHRIYAS KHAN OF HOTI
Advocate High Court
at District Courts Mardan

BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNALPESHAWAR

Appeal No _____ 2019

Mst Shabana Naz

Senior Arabic Teacher (S.A.T) BPS-16

Government Girls High School (GGHS)

Mahoo Dheri Mardan

..... (Petition)

VERSUS

District Education Officer (F) Mardan etc

..... (Respondents)

AFFIDAVIT

I, Shabana Naz D/O Muhamma Yousaf (S.A.T) at G.G.H.S. Mahoo Dheri Tehsil & District Mardan the appellant do hereby solemnly affirm and declare that ~~The~~ contents stated in my accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed. Moreover I have not filed any other appeal, except the present appeal, in any Registry office of the Tribunal at Peshawar for the same cause of action or other matter connected with my terms and conditions of service.

Date: 18 / 7 / 2019


DEPONENT

BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNAL PESHAWAR

Appeal No _____ 2019

Mst Shabana Naz
Senior Arabic Teacher (S.A.T) BPS-16
Government Girls High School (GGHS)
Mahoo Dheri Mardan

..... (Petition)

VERSUS

District Education Officer (F) Mardan etc

..... (Respondents)

Application for condonation of delay

Petitioner submits as under;



1. That the petitioner is submitting appeal before your honor today.
2. That the petitioner could not submit the appeal before your honor which is delay by 12 days.
3. That the delay occurred due to reason that the petitioner ^{was} waiting for reply from high-ups.
4. That the applicant is ^a poor lady and could not afford fee and other expenses of appeal.
5. That the applicant was under acute shock due to victimization of department.
6. Any other point or ground which is taken during the arguments may also be considering the part of this application.

It is therefore humbly pray that the delay may kindly be condoned.

Date: 18 / 7 / 2019

Applicant

Through Counsel



SHABANA NAZ OF HON
Advocate High Court
at District Courts Mardan



11 P. 8
A

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN
PHONE/FAX NO. 09379230158

Email Address: EMISMARDAN_DEOFEMALE@YAHOO.COM

OFFICE ORDER

WHEREASE Mst:Shabana SAT GCHS Maho Dheri (Mardan) was proceeded against under the Khyber Pakhtun Khwa Govt servant (Efficiency & Discipline) Rules, 2011 on account of Mis Conduct.

Now therefore, in exercise of the powers conferred under rule-14 of the Khyber Pakhtun Khwa (Efficiency & Discipline) Rules, 2011, the Competent Authority (DEO Female) is pleased to impose minor penalty of withholding of One increments for two years upon Mst:Shabana SAT GCHS Maho Dheri Mardan & Transferred to GCHS Ghala Dher against vacant SAT post on administrative ground with immediate effect.

Note: Charge Report should be submitted to all concerned.

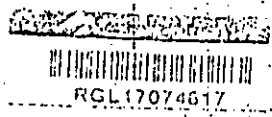
(Zulfiqar-ul-Mulk)
District Education Officer
(Female) Mardan.

Encl: No. 2819/4 / PF Shabana SAT/

Dated 6/4/2019

Copy to the:

1. DWO Mardan
2. Deputy Commissioner Mardan
3. District Nazim Mardan
4. District Accounts Officer Mardan
5. Principal GCHS Ghala Dher Mardan
6. Principal GCHSS No. 1 Mardan
7. Principal GCHS Hou No. 2 Mardan
8. Head Mistress GCHS Maho Dheri
9. Mst:Shabana SAT GCHS Maho Dheri Mardan
10. D. File



District Education Officer
(Female) Mardan

SHARIQ KHAN OF HOTI
Advocate High Court
at District Courts Mardan

Better Copy

Office of the District Education Officer (Female) Mardan

Phone/Fax No: 0937 9230150

Email Address: EMISMARDAN_DEOFEMALE@YAHOO.COM

OFFICIAL ORDER:

Whereas Mst: Shaban SAT GGHS Maho Dheri (Mardan) was proceeded against under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules 2011 on account of misconduct.

Now therefore an exercise of the powers conferred under rule 14 of the Khyber Pakhtunkhwa (Efficiency & Discipline) Rules 2011, the competent authority (DEO Female) is pleased to impose minor penalty of withholding of one increment for two years upon Mst. Shaban SAT GGHS Maho Dheri Mardan and transferred to GGHS Ghala Dher Mardan against vacant SAT post on administrative ground with immediate effect.

Note: Charge report should be submitted to all concerned.


Zulfiqar UI Mulk
District Education Officer
(Female) Mardan

Endst: NO: 2819/9/ PF Shabana SAT/

Date: 06/04/2019

Copy to the:

1. DMO Mardan
2. Deputy Commissioner Mardan
3. District Nazim Mardan
4. District Account Officer Mardan
5. Principal GGHS Ghala Dher Mardan
6. Principal GGHS No: 1 Mardan
7. Principal GGHS Hoti No: 2 Mardan
8. Head Mistress GGHS Maho Dheri Mardan
9. Mst Shaban SAT GGHS Maho Dheri Mardan
10. P, File


SHANRIYAR KHAN OF HOTI
Advocate High Court
at District Courts Mardan

District Education officer
(Female Mardan)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

MST. SHABANA NAZ

VS

DISTRICT EDUCATION OFFICER MARDAN

APPEAL

Respectfully Sir,

The Petitioner submit that application for casual leave dated 13.2.2019 plead as annexure "C" is in the possession of defended (DEO) Mardan hence requested to be called from him.

through

SHABANA NAZ
Advocate High Court
at District Courts Mardan

MST. SHABANA NAZ
(Petitioner)

7

10

CASUAL LEAVE PROFORMA FOR TEACHING STAFF

Name of Teacher	Shabana Noz
Designation	S.A.T
Casual Leave Applied for	Sickness
Casual Leave Required	01
Casual Leave Taken Up to Last Month	03
Total Days	03
Casual Leave Taken in This Month	-
Signature of Teacher	<i>[Signature]</i>
Signature of Head Mistress	

Head Mistress
Govt. Girls High School
Maho Dheri Mardan

Dated: 14/02/2019

Note: Submitted in duplicate to the District Education Officer (Female) for further necessary action.

Head Mistress
Govt. Girls High School
Maho Dheri Mardan

✓ All this ... J/Clerk

[Signature]

CTU
[Signature]

SHAHRIAN OF HOTI
Advocate High Court
at District Courts Mardan

Better Copy

OFFICE OF THE HEAD MISTRESS GOVT GIRLS HIGH SCHOOL, MAHOO DHERI
MARDAN

CASUAL LEAVE PROFORMA FOR TEACHING STAFF

Name of Teacher	Shaban Naz
Designation	SAT
Casual Leave applied for	Sickness
Casual Leave Required	01
Casual Leave taken up to last month	03
Total <i>upTo</i>	03
Casual Leave Taken in this Month	
Signature of Teacher	
Signature of Head Mistress	

Head Mistress
Govt Girls High School
Maho Dheri Mardan

Enclose No: _____

Date: 14/02/2019

Note: Submitted in duplicate to the District Education Officer (Female) for further necessary.

Head Mistress
Govt Girls High School
Maho Dheri Mardan

Abbass... J/Clerk


SHANZAR KHAN OF NOTI
Advocate High Court
District Courts Mardan

بخدمت جناب ڈائریکٹر آف ایجوکیشن خیبر پختونخوا ایشاور

جناب عالی!

گزارش کی جاتی ہے۔ کہ میں نے 14-2-2019 کو DEO (F) مردان کو اپنی ہیڈ مسٹریس جو کہ میرا جائز اور قانونی Causal Leave Proforma سائن نہیں کر رہی تھی، اس کے اسی نامناسب رویہ کے خلاف درخواست لکھی۔ جو کہ ADO (زنانہ) مردان مسز فوزیہ اعظم نے وصول کی۔ جسکے بارے میں مشہور ہے۔ کہ وہ بہت کرپٹ ہے اور اپنی 3,4 بہنوں کو بھی ناجائز طریقے سے محکمہ ایجوکیشن مردان میں بھرتی کیا ہے۔ مسز فوزیہ اعظم نے وہ درخواست DEO (F) کو دینے کی بجائے میری ہیڈ کو دکھادی ہے۔ اور مسز فوزیہ اعظم ہی کی مدد سے میری ہیڈ مسٹریس GGHS مہوڑ پھیری مردان مس زبیدہ بیگم نے التامیرے خلاف درخواست دی ہے۔ DEO (F) مردان کے موجودہ DEO ذوالفقار الملک کے مطابق 23-2-2019 کو مس زبیدہ نے درخواست دی ہے تو نہ تو مس زبیدہ کی درخواست پر کوئی انکوائری کی گئی ہے بلکہ 02-03-2019 کو سابقہ DEO زنانہ محترمہ رخسانہ رحیم نے مجھے آفس بلایا تو شدید بارش کے باوجود میں آفس گئی جس پر محترمہ رخسانہ رحیم صاحبہ نے میری بہت تعریف کی۔ اور میری بات سننے کے بعد سپرنٹنڈنٹ گل بہادر سے مس زبیدہ کا نمبر ملانے کو کہا تو ہمارے سامنے ہیڈ مسٹریس زبیدہ بیگم کو DEO زنانہ محترمہ رخسانہ رحیم نے نصیحت کی کہ یہ تیری ماتحت لیچر صرف تیری تابعداری نہیں کرے گی بلکہ آپ بھی اس کے سر پر دست شفقت رکھیں گی۔ اس کے بعد میرے خلاف کوئی درخواست نہیں دی گئی۔ اس کے باوجود بھی مجھے DEO زنانہ آفس نے Personal Hearing کے عنوان سے مجھے دو لیٹرز بھیجے گئے ایک میں ٹائم 10 بجے دیا گیا۔ لیکن 26-03-2019 کو DEO زنانہ آفس کے عمران نامی بابو نے 0340-1900002 اس نمبر سے مجھے کال کی کہ تم نے 2 بجے کے بعد آنا ہے۔ دوسرے لیٹر میں ذکر ہے کہ انکوائری رپورٹ کی روشنی میں حالانکہ اس دوران کوئی انکوائری نہیں ہوئی۔ پھر بھی میں 02-04-2019 کو DEO زنانہ آفس اپنے بھائی اور تنظیم علماء اساتذہ مردان کے صدر مولانا شاہ زمان صاحب کے ہمراہ چلی گئی۔ لیکن DEO زنانہ آفس کے موجودہ DEO ذوالفقار الملک کا رویہ ایک آفیسر کا نہیں تھا بلکہ ایک دشمن سے بھی بدتر تھا۔ ایک طرف کہہ رہا تھا کہ میرے سوالوں کا جواب دو اور دوسری طرف کہہ رہا تھا کہ تم Reasoning کر رہی ہو۔ اور میری بات بالکل نہیں سن رہا تھا۔ بلکہ مجھ پر مسلسل ٹرانسفر کے لئے دباؤ ڈال رہا تھا۔ اور مجھے دھمکی بھی دی کہ اگر تم نے یہ بات نہیں مانی تو میرے پاس اختیار ہے کہ تمہیں برطرف Terminate یا D Grader کر دوں۔ تو میں نے کہا کہ ایک ٹویہ میرا وکل سکول ہے اور دوسرا یہ کہ میں نے کچھ کیا بھی نہیں ہے۔ بلکہ میری ہیڈ مسٹریس میرے ساتھ زیادتی کر رہی ہے۔ تو میں کیوں جاؤں؟ اس پر ذوالفقار الملک آپ سے باہر ہو گیا اور کہا کہ ہیڈ مسٹریس کو ظلم اور زیادتی کرنے کا حق حاصل ہے۔ مگر ایک لیچر کو فریاد کرنے کا حق حاصل نہیں ہے۔ اور یہ کہ تم یہ نوکری چھوڑ دو کسی اور ڈیپارٹمنٹ میں چلی جاؤ۔ جس پر میں نے کہا کہ سر آپ نے مجھے Personal Hearing کے لئے بلایا ہے یا میری بے عزتی کرنے کے لئے مجھے بلایا ہے۔ اور یہ کہ اگر میں نوکری چھوڑنا چاہوں تو اس کے لئے میں DEO آفس میں مشورہ لینے کے لئے نہیں آؤں گی۔ کیونکہ یہ میرا ذاتی معاملہ ہے۔

تو جناب عالی! کیا ذوالفقار الملک صاحب اپنے اختیارات کا جائز استعمال کر رہا ہے؟ اور کیا واقعی قانون ایک ہیڈ مسٹریس کو ظلم اور زیادتی کرنے کا حق دیتا ہے؟ اور یہ کہ اگر DEO زانانہ آفس مردان بقول ذوالفقار الملک صاحب HMs اور Principals کا ہے تو پھر ٹیچرز کو بتا دیا جائے کہ ان کا آفس کونسا ہے۔ جہاں پروہ اپنا مسئلہ لے کے جائیں۔ اور یہ کہ جب DEO زانانہ آفس مردان ٹیچرز کا نہیں ہے تو پھر یہ لوگ کس حیثیت سے اور کیوں ٹیچرز کو مختلف جیلوں بہانوں سے آفس بلاتے ہیں؟ بقول ذوالفقار الملک صاحب کے وہ حاکم وقت ہے اور سب کچھ کر سکتا ہے اور اس سے کوئی پوچھنے والا نہیں ہے۔ اور وہ کسی بھی اساتذہ تنظیم کو نہیں مانتا۔ تو میرا آپ صاحبان سے عرض ہے کہ کیا DEO ذوالفقار الملک صاحب کی یہ بات ٹھیک ہے یا غلط؟ کیونکہ وہ Personal Hearing کے نام پر وہ ٹیچرز کو بلا کر ان کی بے عزتی کرتا ہے ان کی بات نہیں سنتا ہے۔ بلکہ ان کو ڈراتا دھمکاتا ہے۔ اور ان پر ناجائز ٹرانسفر کے لئے ڈباؤ ڈالتا ہے۔ لہذا آپ صاحبان مہربانی کر کے DEO زانانہ ذوالفقار الملک سے اس ظلم و زیادتی کے بارے میں پوچھیں کہ آخر وہ کیوں ٹیچرز کے مسائل حل کرنے کی بجائے ان کے مسائل کو بڑھا رہا ہے۔ اور آپ صاحبان مسز فوزیہ اعظم کے خلاف بھی کارروائی کریں کہ جو اپنے اختیارات کا غلط استعمال کر رہی ہے۔ اور ٹیچرز کی دی گئی درخواست DEO زانانہ کو دینے کی بجائے اس ہیڈ مسٹریس کے حوالے کرتی ہے جس کے خلاف درخواست دی گئی ہو۔ کیا جب ایک ٹیچر رشوت کے خلاف ہو اور وہ فوزیہ اعظم کو رشوت نہ دیتی ہو تو فوزیہ اعظم کو ان کے لئے ایسی مشکلات پیدا کرنے کا حق ہے؟ اور میری اس درخواست پر تاحال کوئی کارروائی نہیں کی گئی جو میں نے 14-02-2019 کو DEO زانانہ مردان کو لکھی تھی۔ اور میں نے 02-03-2019 کو محترمہ رخسانہ رحیم صاحبہ سے پوچھا کہ کیا آپ کو میری درخواست ملی ہے تو اس نے کہا کہ نہیں ابھی تک مجھے کوئی درخواست نہیں ملی۔ اس درخواست کے ساتھ ساری کا پتیاں منسلک ہیں۔ ملاحظہ فرمائیں۔

مگر یہ

بقول مراسلہ

۱۔ ڈائریکٹر خیر پختوانخواہ پشاور

۲۔ DCO مردان

۳۔ ڈسٹرکٹ ناظم مردان

۴۔ سیکرٹری ایجوکیشن پشاور

Shabana Naz SAT

GGHS Maho Dheri

Mardan

Date: 05-04-2019

Signature
Secretary, District Court
Mardan

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

PHONE/FAX NO. 0937-9230150

Email Address: -emismardan_deofemale @Yahoo.com

P. 12
'G'

No. _____ /File, DA/AT

Dated: 21/3/2019

To

Mst Shabaha, 'A.T'
GGHS, Maho Dheri Mardan.

Subject: PERSONAL HEARING.

Memo:

You are directed to attend the office of the undersigned on 28-3-2019, at 10:00 Am sharply for personal hearing.

In case of non compliance of this order it will be presumed that you have nothing to say in your defence and ex-parce action will be taken against you.

DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

Encl: No. 2286 /

Copy for information the :-

1. Head Mistress, GGHIS Kourgh with the remarks to inform the mistress concerned accordingly.

DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

Handwritten signature
SPECIAL AGENT
At District High Court
at District Courts Mardan

Handwritten initials

P. 15

At 5



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN.
PHONE/FAX NO.09379230150

Email Address:-EMISMARDAN_DEOFEMALE@YAHOO.COM

No _____/

Dated _____/2019


22/3

To

Mst:Shabana S.AT,
GGHS Mahod Dheri.

Subject:- **PERSONAL HEARING**
Memo:

In the light of the inquiry report you are directed to attend this office for personal hearing with in three days positively.
In case of non complance, it will be presumed disobedience and ex-party action will be taken against you that is compulrsy retirement from service.

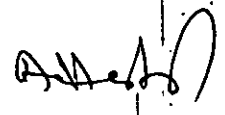

District Education Officer
(Female) Mardan

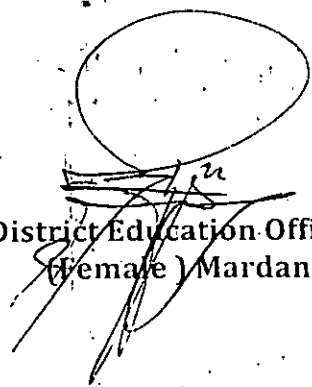
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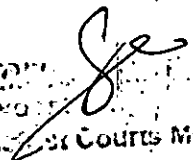
Endst No : _____/ Shabna Inq File
Copy for information to the :

Dated Mardan the : _____/2019

- 1: Principal GGHS NO 1 Mardan.
- 2: Head Mistress GGHS Maho Dheri Mardan.
- 3: P/File.




District Education Officer
(Female) Mardan


District Advocate
at District Courts Mardan

OFFICE OF THE
DISTRICT NAZIM
DISTRICT GOVERNMENT
MARDAN

P. (15)

(2)

(1)

No. 641-49 /DNM/PSO

Dated Mardan the 01 /April/ 2019

OFFICE ORDER

In exercise of powers conferred upon the District Nazim Mardan, the undersigned being Executive Authority, has been pleased to impose complete ban on all kind of postings/transfers in all devolved departments functioning in Mardan District with immediate effect till further orders in the best public interest.

(IHTISHAM ALI)

District Nazim, Mardan.

Copy to:

- 1- Deputy Commissioner, Mardan.
- 2- All Heads of Devolved Department in Mardan District.
- 3- District Accounts Officer, Mardan.
- 4- PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
- 5- PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 6- District Naib Nazim Mardan.
- 7- AD LG & RDD Mardan.
- 8- AD Information Mardan Division.
- 9- PSO to District Nazim Mardan.

(IHTISHAM ALI)

District Nazim, Mardan.

SHAHINVAZ KHAN OF HOTI
Advocate High Court
at District Courts Mardan

CCO Mardan

خدمت جناب DEO محل مردان

13

P.16

جناب عالی

آپ کی خدمت میں عرض ہے کہ میں GGHS مہرز میری میں SAT ہوں۔ لیکن سابق DEO نے یہاں
مردان ذوالفقار الملک نے میرا بھری تیار کر لیا ہے۔ اسکے باوجود کہ میں بذات خود پوسٹل ہیڈنگ کیلئے اسکے آفس میں۔ لیکن وہ میری کوئی
بات نہیں سن رہے تھے اور پھر پوسٹل سفر کیلئے مسلسل دباؤ ڈال رہے تھے۔ میں نے عرض کی کہ سر میں کیوں ٹرانسفر کرناؤں کیونکہ میرا تو کوئی
تصور نہیں ہے بلکہ میری ہیڈ مسٹرس میرے ساتھ زیادتی کر رہی ہے جو کہ میرا C/Leave Proforma میں نہیں کر رہی تھی اور دوسرا
یہ کہ میرا توکل سکول ہے لیکن انہوں نے میری کوئی بات نہیں مانی۔ اور ٹرانسفر پر بین لکھنے کے باوجود بھی میرا جری تیار 6-04-2019 کو
کر دیا۔ اور دوسرا یہ کہ میرا جرم بھی ثابت نہیں ہوا ہے اور اگر جرم ثابت ہو بھی جائے تو صرف ایک سزا ملتی ہے لیکن سابق DEO نے یہاں
مردان ذوالفقار الملک نے اختیارات سے تجاوز کرتے ہوئے مجھے دوسرا میں دی۔ جو کہ سراسر بے انصافی ہے۔
لہذا آپ صاحبان میرا یہ بھری اور ناجائز تیار منسوخ کرا دیں۔ شکریہ

شانیہ

شانہ نامہ

GGHS مہرز میری مردان

Date: 11/04/2019

Shaniya

SHANIYA SINGH DEHOTI
Advocate High Court
at District Courts Mardan

P18 K



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN.
PHONE/FAX NO.09379230150

Email Address:-EMISMARDAN_DEOFFEMALE@YAHOO.COM

5434

/PF Shabana S.AT

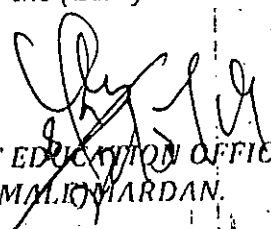
Dated 22/05 /2019

Mst: Shabana S.AT
GGHS Maho Dheri Mardan.

Subject:- SHOW CAUSE NOTICE
Memo;

1. You Mst:Shabana S.AT, refusing the direction of the competent Authority.
2. You Mst Shabana S.AT is not handover/taking charge of the concerned schools.
3. You Mst:Shabana S.AT is not obey the order of the competent authority.

Therefore you are directed to explain your position with in 15 days Other-wise strict disciplinary action will be initiated against you under the (E&D) Rules 2011.

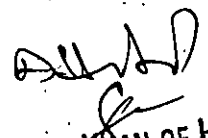

DISTRICT EDUCATION OFFICER
(FEMALE)MARDAN.

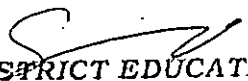
Inst.No _____/

dated _____/2019

Copy to the.

Head Mistress GGHS Maho Dheri (Mardan).


SHANRIVER KHAN OF HOTT
Advocate High Court
District Courts Mardan


DISTRICT EDUCATION OFFICER
(FEMALE)MARDAN.