

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____/2024
In S.A No.2611/2023

Muhammad Asad Khan. **APPELLANT**

VERSUS

Govt. of KP thr. Secretary E&SE & others. . . **RESPONDENTS**

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Application		1
2.	Affidavit		2
3.	Copy of Letter dated 12.07.2023		3
4.	Copy of Letter dated 17.07.2023		4
5.	Copy of Character Certificate		5
6.	Copies of Relieving Orders dated 31.07.2021		6-20
7.	Copy of Order dated 22.09.2022 passed by Senior Civil Judge (Admin)/MTMC, Battagram in Case No.2/2-GBV of 2022		21-25
8.	Copy of Compromise Deed		26-27
9.	Copy of FIR No.299 dated 05.08.2021		28-29
10.	Copy of Office Order dated 05.05.2023		30
11.	Copy of Adjustment Order dated 17.05.2023		31
12.	Copy of Letter dated 28.04.2023, in Respect of Arrival and Compliance of Transfer Order		32
13.	Copy of Absent Report dated 26.04.2023		33

Through

AK
Appellant

Ahmad Saeed
Akhunzada Ahmad Saeed
Advocate High Court

Dated: 15.02.2024

20-02-24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____/2024
In S.A No.2611/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11162

Dated 15-02-2024

Muhammad Asad Khan. **APPELLANT**

VERSUS

Govt. of KP *thr.* Secretary E&SE & others. . . **RESPONDENTS**

APPLICATION SEEKING PERMISSION
TO PLACE ON FILE ADDITIONAL
DOCUMENTS.

Respectfully Sheweth:

1. That above noted appeal is pending adjudication before this Hon'ble Tribunal and is fixed for 20.02.2024.
2. That the appellant seeks permission of this Hon'ble Tribunal to place on file some important documents, for the proper assistance of this Hon'ble Tribunal, hence this application.
3. That the documents annexed shall in no way would prejudice the real cause of dispensation of justice, rather would help this Hon'ble Tribunal for correct decision of the case.

It is, therefore, respectfully prayed that on acceptance of instant application, appellant may be permitted to place on file the subject mentioned documents, in the best interest of justice.

Through

Appellant
Appellant

Ahmad
Akhunzada Ahmad Saeed
Advocate High Court

Dated: 15.02.2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____/2024
In S.A No.2611/2023

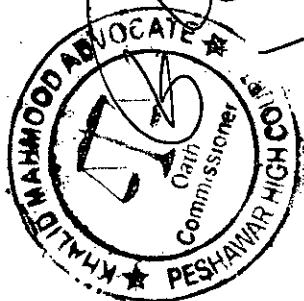
Muhammad Asad Khan. **APPELLANT**

VERSUS

Govt. of KP *thr.* Secretary E&SE & others. . . **RESPONDENTS**

AFFIDAVIT

I, Akhunzada Ahmad Saeed Advocate Supreme Court, as per information conveyed to me by my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



25-2-24
Asad
ADVOCATE

3

1



OMBUDSMAN (SECRETARIAT REGIONAL OFFICE,
ABBOTTABAD
GOVERNMENT OF KHYBER PAKHTUNKHWA

URGENT

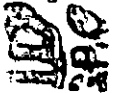
SECOND NOTICE

No. PO/Complaint/1151/06/2023/P. /1431

Dated: Abbottabad the, 12/07/2023

To

1. Director,
Directorate of Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.



2. District Education Officer (Female),
Battagram.

SUBJECT: REQUEST FOR RELEASE OF SALARY

With reference to this Secretariat First Notice dated 16/06/2023 on the subject noted above, the requisite written reply on the subject has not so far been received to this Secretariat which has delayed the disposal of complaint.

You are, therefore, required to expedite reply so as to reach the undersigned before **25/07/2023**, to avoid further delay in disposal of complaint.

NOTE: Failure to submit reply/comments shall warrant action under Section 14 of the Provincial Ombudsman Act, 2010.

BY THE ORDER OF OMBUDSMAN, KHYBER PAKHTUNKHWA.

Muhammad Usman Akram
12/07/2023
Deputy Registrar
Ombudsman Regional Office,
Abbottabad

ATTESTED



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
KHYBER PAKHTUNKHWA, PESHAWAR

4

Reminder-1

No. 7347-48 / F.No. 278/Omubs/P.F Muhammad
Asad/Battagram/2023
Dated Peshawar the 17/7 / 2023

To

The District Education Officer (Male & Female)
Battagram.

Subject: **REQUEST FOR RELEASE OF SALARY.**

I am directed to refer to this office letter No. 4354-55 dated 26.06.2023 on the subject cited above and to enclose therewith a copy of the reminder No. PO/Complaint/1151/06/2023/1430 dated 12.07.2023 in r/o Muhammad Asad R/O Battagram from the Deputy Registrar, Ombudsman Secretariat Regional Office, Abbottabad Khyber Pakhtunkhwa, already directly addressed to you. The requisite report is still awaited from your end.

You are therefore, once again directed to expedite the instant case and submit a comprehensive report to this office at the earliest for further process and onward submission to the Deputy Registrar, Ombudsman Secretariat Regional Office, Abbottabad Khyber Pakhtunkhwa.

Encls: As Above

[Signature]
AD (RTI & Ombudsman)
Directorate of E&SE KP

Endst: No _____ /

Copy forwarded to the: -

1. **Muhammad Usman Akram**, Deputy Registrar, Ombudsman Secretariat Regional Office, Abbottabad Khyber Pakhtunkhwa w/r to his letter No & dated cited above. (1st Floor, Jalal Baba Auditorium, Allama Iqbal Road, Abbottabad)
2. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.

[Signature]
AD (RTI & Ombudsman)
Directorate of E&SE KP

ATTESTED

CHARACTER CERTIFICATE

5

Certified that Mr. Muhammad Asad Khan CO BPS-16 is integral part in the District Education Office (F) Battagram. I found him a remarkable level of professionalism, Man of Principle, good Character, and sound Personality.

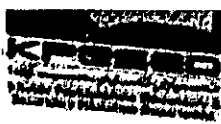
His interaction with female Colleagues/Teachers has been characterized by courtesy and a deep sense of mutual respect.


Dy: District Education Officer (F)

DDEO (F) Battagram
Battagram

20 May 2022


ATTESTED



DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM

(Phone # 0997-310460)

E-mail: demisbattagram@yahoo.com

6

NO. 1787/
DATED: 31/07/2021

RELIEVING ORDER.

Whereas Mr. Murshid Alam working as KPO BS-16 in DEO Female Office Battagram.

Whereas he often involved in different protests, using pressurized tactics and creating anarchy.

Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.

Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.

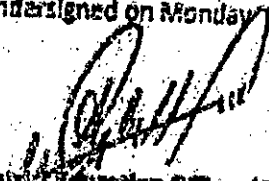
Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Battagram Mst. Tahira Bibi.

Whereas due to his this act ASDEOs circle concerned submitted application under Harassment Act

Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Battagram and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also actively participating in in whatsapp group "Wisehari DEO Female" created for communication to motivate the mob/officials for protest and other unofficial activities.

Now therefore I DEO Female Battagram in view of the above situation Mr. Murshid Alam KPO BS-16 DEO Female Battagram is hereby relieved from his duty and directed to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021

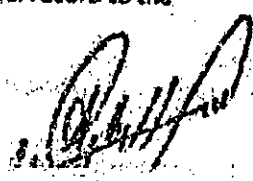

District Education Officer (F)
Battagram

Endstt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file





**DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demf@battagram@yahoo.com

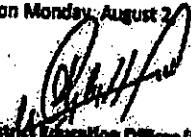
NO. 1791/
DATED: 31/07/2021

7

RELIEVING ORDER.

Whereas Mr. Abdul Aziz working as Junior Clerk BS-09 in GGHS Banlan
Whereas he often involved in different protests, using pressurized tactics and creating anarchy.
Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin
down strike without any genuine reason.
Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar
he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the
different schools.
Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle
Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tahira Bibi
Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act
Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO
Battagram lives are at risk due to his this act.
Whereas he has also actively participating in in whatsapp group "Malgar DEO Female" created for
communication to motivate the mob/officials for protest and other unofficial activities.


Now therefore I DEO Female Battagram in view of the above situation Mr. Abdul Aziz Junior Clerk BS-09
GGHS Banlan is hereby relieved from his duty and directed to report to Directorate of ESE with immediate
effect and further directed to hand over all the official record to the undersigned on Monday, August 2
2021.


District Education Officer (F)
Battagram

Endstt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Head Mistress GGHS Banlan with the request to stop his salary
- 8- Office file


District Education Officer (F)
Battagram

TESTED



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM

(Phone # 0997-310460)

E-mail: demisbattagram@yahoo.com

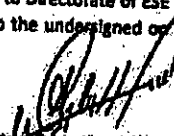
NO. 1788/
DATED: 31/07/2021

8

RELIEVING ORDER.

Whereas Mr. Attaur Rehman working as Junior Clerk BS-09 in DEO Female Office Battagram
Whereas he often involved in different protests, using pressurized tactics and creating anarchy.
Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin
down strike without any genuine reason.
Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar
he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the
different schools.
Whereas in the meeting he signed harassed/threatened resolution against the female ASDEO circle
Battagram Ms. Shabnam and ASDEO Circle Bataamohri Tahira Bibi
Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act
Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO
Battagram lives are at risk due to his this act.
Whereas he has also actively participating in in whatsapp group "Malgari DEO Female" created for
communication to motivate the mob/officials for protest and other unofficial activities.

Now therefore I DEO Female Battagram in view of the above situation Mr. Attaur Rehman Junior Clerk BS-
09 DEO Female Battagram is hereby relieved from his duty and directed to report to Directorate of ESE
with immediate effect and further directed to hand over all the official record to the undersigned on
Monday August 2, 2021


District Education Officer (F)
Battagram

Endstt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file


District Education Officer (F)
Battagram

TESTED

**DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demisbattagram@yahoo.com

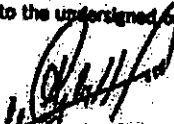
NO. 1783/
DATED: 31/07/2021

9

RELIEVING ORDER.

Whereas Mr. Sher Muhammad working as Junior Clerk BS-09 in DEO Female Office Battagram
Whereas he often involved in different protests, using pressurized tactics and creating anarchy.
Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin
down strike without any genuine reason.
Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar
he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the
different schools.
Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle
Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tahra Bibi
Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act
Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO
Battagram lives are at risk due to his this act.
Whereas he has also actively participating in in whatsapp group "Malgari DEO Female" created for
communication to motivate the mob/officials for protest and other unofficial activities.

Now therefore I DEO Female Battagram in view of the above situation Mr. Sher Muhammad Junior Clerk
BS-09 DEO Female Battagram is hereby relieved from his duty and directed to report to Directorate of ESE
with immediate effect and further directed to hand over all the official record to the undersigned on
Monday August 2, 2021


District Education Officer (F)
Battagram

Enclt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file


District Education Officer (F)
Battagram

TESTED



OFFICE OF THE

DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM

(Phone # 0097-310460)

E-mail: demisibattagram@yahoo.com

NO. 1777/
DATED: 31/07/2021

10

RELIEVING ORDER:

Whereas Mr. Amir Rehman working as Assistant, BPS-16 in SDEO Female Office Allai and having longest tenure in female side.

Whereas he often involved in different protests, using pressurized tactics and creating anarchy through spreading viral messages against different Govt employees/offices etc.

Whereas he motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.

Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.

Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tahira Bibi.

Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act

Whereas the female officer of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also used an unofficial/threatening/harassing language/mobilizing mob for anarchy in whatsapp group "Malgar DEO Female".

Now therefore I DEO Female Battagram in view of the above situation Mr. Amir Rehman Assistant BS-16 SDEO Female Allai is hereby relieved from his duty and directed him to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021


District Education Officer (F)
Battagram

Endsdt No. as above

Copy for information to the-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file


District Education Officer (F)
Battagram

TESTED



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demisbattagram@yahoo.com

NO. 1774/

DATED: 31/07/2021

11

RELIEVING ORDER

Whereas Mr. Ijaz Hussain Shah working as Assistant BPS-16 in DEO Female Office Battagram and longest entire tenure in the female side.

Whereas he always involved in different protests, using pressurized tactics and creating anarchy through spreading viral messages against different Govt employees/offices etc.

Whereas all the female teachers complaining regarding his behaviors.

Whereas he motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.

Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.

Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Batamohri Tahira Bibi

Whereas due to his this act ASDEOs circle concerned submitted application under Harassment Act

Whereas the female officer of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also used an unofficial/threatening/harassing language/mobilizing mob for anarchy in whatsapp group "Malgari DEO Female".

Now therefore I DEO Female Battagram in view of the above situation Mr. Ijaz Hussain Shah Assistant BS-16 is hereby relieved from his duty and directed him to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021.

District Education Officer (F)
Battagram

Enclt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side any more.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/officials concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file

District Education Officer (F)

ATTESTED

**DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demisfbattagram@yahoo.com

12

NO. 1782/

DATED: 31/07/2021

RELIEVING ORDER.

Whereas Mr. Muhammad Sadiq working as Senior Clerk BS-14 in SDEO Female Office Battagram

Whereas he often involved in different protests, using pressurized tactics and creating anarchy.

Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.

Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.

Whereas in the meeting he signed harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tahira Bibi

Whereas due to his this act ASDEOs circle concerned submitted application under Harassment Act

Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also actively participating in in whatsapp group "Malgari DEO Female" created for communication to motivate the mob/officials for protest and other unofficial activities and also he advised in the same group that bio metric machine may be damaged and destroyed.

Now therefore I DEO Female Battagram in view of the above situation Mr. Muhammad Siddique Senior Clerk BS-14 SDEO Female Battagram is hereby relieved from his duty and directed to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021.


District Education Officer (F)
Battagram

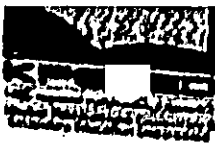
Enclst No. as above.

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram.
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file

WITNESSED





**DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demisfbattagram@yahoo.com

13

NO. 1792/

DATED: 31/07/2021

RELIEVING ORDER.

Whereas Mr. Sheryar Khan working as Junior Clerk BS-09 in SDEO Female Battagram.

Whereas he often involved in different protests, using pressurized tactics and creating anarchy.

Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.

Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.


Whereas in the meeting he stigned harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tahira Bibi

Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act

Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also actively participating in in whatsapp group "Malgari DEO Female" created for communication to motivate the mob/officials for protest and other unofficial activities.

Now therefore I DEO Female Battagram in view of the above situation Mr. Sheryar Junior Clerk BS-09 SDEO Female Battagram is hereby relieved from his duty and directed to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021


District Education Officer (F)
Battagram

Endsit No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file

TESTED


District Education Officer (F)

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM

(Phone # 0997-310460)

E-mail: daniafbattagram@yahoo.com

14

NO. 1789/
DATED: 31/07/2021

RELIEVING ORDER.

Whereas Mr. Shah Feroz working as Daftr in DEO Female Office Battagram
Whereas he often involved in different protests, using pressurized tactics and creating anarchy.
Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin
down strike without any genuine reason.
Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar
he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the
different schools.
Whereas in the meeting he slinged harassed/threatened resolution against the female ASDEO circle
Battagram Mst. Shabnam and ASDEO Circle Bataimohri Tahira Bibi
Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act
Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Bataimohri and ASDEO
Battagram lives are at risk due to his this act.
Whereas he has also actively participating in in whatsapp group "Malgari DEO Female" created for
communication to motivate the mob/officials for protest and other unofficial activities.


Now therefore I DEO Female Battagram in view of the above situation Mr. Shah Feroz Daftr DEO Female
Battagram is hereby relieved from his duty and directed to report to Directorate of ESE with immediate
effect and further directed to hand over all the official record to the undersigned on Monday August 2
2021.


District Education Officer (F)
Battagram

Endst: No. as above.

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram.
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file


District Education Officer (F)
Battagram

ATTESTED

(Phone # 0997-310460)

E-mail: demisbattagram@yahoo.com

NO. 1781/
DATED: 31/07/2021

15

RELIEVING ORDER.

Whereas Mr. Munir Ullah working as Senior Clerk BS-14 in DEO Female Office Battagram
Whereas he often involved in different protests, using pressurized tactics and creating anarchy.
Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.
Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.
Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Bataimohri Tahira Bibi
Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act
Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Bataimohri and ASDEO Battagram lives are at risk due to his this act.
Whereas he has also actively participating in in whatsapp group "Malgari DEO Female" created for communication to motivate the mob/officials for protest and other unofficial activities.


Now therefore I DEO Female Battagram in view of the above situation Mr. Munir Ullah Senior Clerk BS-14 DEO Female Battagram is hereby relieved from his duty and directed to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021.


District Education Officer (F)
Battagram

Endstt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file



ATTESTED

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM

(Phone #0997-310460)

E-mail: demsfbattagram@vahoo.com


NO. 1785/
DATED: 31/07/2021

16

RELIEVING ORDER.

Whereas Mr. Bakhtiar Ahmad working as Junior Clerk BS-09 in GGHS Neeleeshang
Whereas he often involved in different protests, using pressurized tactics and creating anarchy.
Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin
down strike without any genuine reason.
Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar
he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the
different schools.
Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle
Battagram Mst. Shabnam and ASDEO Circle Batsamohri Tabira Bibi
Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act
Whereas the female officers of DEO F Battagram such as DEO Female, ASDEO Batsamohri and ASDEO
Battagram lives are at risk due to his this act.
Whereas he has also actively participating in In whatsapp group "Malgari DEO Female" created for
communication to motivate the mob/officials for protest and other unofficial activities.

Now therefore I DEO Female Battagram in view of the above situation Mr. Bakhtiar Junior Clerk BS-09
GGHS Neeleeshang is hereby relieved from his duty and directed to report to Directorate of ESE with
immediate effect and further directed to hand over all the official record to the undersigned on Monday
August 2, 2021.


District Education Officer (F)
Battagram

Endstt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Head Mistress GGHS Neeleeshang with the request to stop his salary
- 8- Office file


ATTESTED

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM

(Phone # 0997-310460)

E-mail: demi@battagram@yahoo.com

NO. 1776/
DATED: 31/07/2021

17

RELIEVING ORDER.

Whereas Mr. Saboon teaching cadre working as ADEO BPS-16 in DEO Female Office Battagram
Whereas he often involved in different protests, using pressurized tactics and creating anarchy through spreading viral messages against different Govt employees/offices etc.

Whereas he motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.


Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.

Whereas in the meeting he signed harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Battagram Tahira Bibi

Whereas due to his this act ASDEOs circle concerned submitted application under Harassment Act
Whereas the female officer of DEO F Battagram such as DEO Female, ASDEO Battagram and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also used an unofficial/threatening/harassing language/mobilizing mob for anarchy in whatsapp group "Malgar DEO Female".

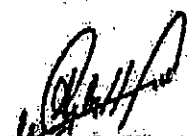
Now therefore I DEO Female Battagram in view of the above situation Mr. Saboon ADEO BS-16 is hereby relieved from his duty and directed him to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021.


District Education Officer (F)
Battagram

Endstt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore and adjust him as SST in school.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file


District Education Officer (F)
Battagram


INTERESTED

EDUCATION OFFICER (FEMALE)
BATTAGRAM

(Phone # 0997-310460)

E-mail: daniabattagram@yahoo.com

18

NO. 1780/

DATED: 31/07/2021

RELIEVING ORDER.

Whereas Mr. Wahab Shah working as Assistant BPS-16 in SDEO Female Office Battagram and having longest tenure in female side.

Whereas he often involved in different protests, using pressurized tactics and creating anarchy.

Whereas he used his influence to motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.

Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.

Whereas in the meeting he singed harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tahira Bibi

Whereas due to his this act ASDEOs circled concerned submitted application under Harassment Act

Whereas the female officer of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also actively participating in in whatsapp group "Malgar DEO Female" created for communication to motivate the mob/officials for protest and other unofficial activities.

Now therefore I SDEO Female Battagram in view of the above situation Mr. Raja Khan Assistant BS-16 DEO Female Battagram is hereby relieved from his duty and directed him to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021


District Education Officer (F)
Battagram

Endstt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file

ATTESTED


District Education Officer (F)
Battagram

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demsfbattagram@yahoo.com

19

NO. 1775/

DATED: 31/07/2021

RELIEVING ORDER.

Whereas Mr. Saifullah teaching cadre working as ADEO P&D BPS-16 in DEO Female Office Battagram

Whereas he often involved in different protests, using pressurized tactics and creating anarchy through spreading viral messages against different Govt employees/offices etc.

Whereas he motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.

Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he participated actively in a meeting conducted with the male staff of DEO Female Office and clerk of the different schools.

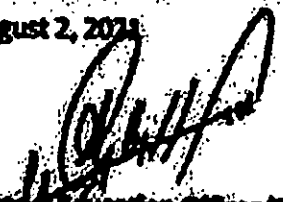
Whereas in the meeting he slinged harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tahira Bibi

Whereas due to his this act ASDEOs circle concerned submitted application under Harassment Act

Whereas the female officer of DEO F Battagram such as DEO Female, ASDEO Battamohri and ASDEO Battagram lives are at risk due to his this act.

Whereas he has also used an unofficial/threatening/harassing language/mobilizing mob for anarchy in whatsapp group "Malgari DEO Female".

Now therefore I DEO Female Battagram in view of the above situation Mr. Saif Ullah ADEO BS-16 is hereby relieved from his duty and directed him to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021

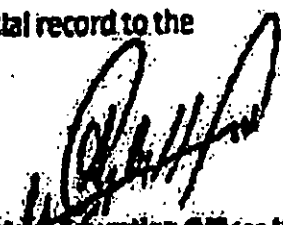

District Education Officer (F)
Battagram

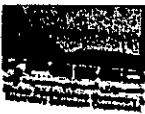
Enditt No. as above

Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP Peshawar.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that may be proceeded under the relevant rules and also it is requested that he may not be adjusted at female side anymore and adjust him as SST in school.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer/official concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file

ATTESIEU





**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-910480)

E-mail: Jamisfbattagram@yahoo.com

20

NO. 1773/
DATED: 31/07/2021

RELIEVING ORDER.

Whereas Mr. Muhammad Zubair Khan working as Budget and Account Officer in DEO Female Office Battagram and also introduce himself as APCA President.
Whereas he always involved in different protests, using pressurized tactics and creating anarchy through spreading viral messages against different Govt employees/offices etc.
Whereas he again motivated the officials of DEO female Battagram for protest and pin down strike without any genuine reason.
Whereas on dated 30/07/2021 while the undersigned was proceeded for an official meeting in Peshawar he conducted meeting under his chairman ship with the male staff of DEO Female Office and clerk of the different schools.
Whereas in the meeting all the staff under his chairman ship have signed and issued a harassed/threatened resolution against the female ASDEO circle Battagram Mst. Shabnam and ASDEO Circle Bataamohri Tehira Bibi
Whereas due to his this act ASDEOs circles concerned submitted application under Harassment Act
Whereas the female officer of DEO F Battagram such as DEO Female, ASDEO Bataamohri and ASDEO Battagram lives are at risk due to his this act.
Whereas he has also used an unofficial/threatening/harassing language for the female officer concerned in his whatsapp group "Malgari DEO Female".

Now therefore I DEO Female Battagram in view of the above situation Mr. Muhammad Zubair Khan BAO is hereby relieved from his duty as BAO DEO female Battagram and directed him to report to Directorate of ESE with immediate effect and further directed to hand over all the official record to the undersigned on Monday August 2, 2021

District Education Officer (F)
Battagram

Endsdt No. as above
Copy for information to the:-

- 1- PS to Secretary to Govt of Khyber Pakhtunkhwa for Elementary and Secondary Education KP with request that necessary action under the rules may kindly be initiated against Mr. Zubair BSAO BPS-17 and further he may not be adjusted in any female office in the best interest of females officers/officials.
- 2- PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with the request that the officer concerned may be proposed for disciplinary proceeding under the relevant rules.
- 3- Deputy Commissioner Battagram
- 4- District Police officer Battagram with the request to collect all the official record which is in his custody and handover to the undersigned.
- 5- District Accounts officer Battagram with the request to stop his salary with immediate effect.
- 6- Officer concerned with the directions to hand over all the official record to the undersigned on Monday 02/August/2021 at 10:00am.
- 7- Office file

ATTESTED

21

بسم اللہ الرحمن الرحیم
عدالت جناب سید ابرار
14/09/2022
محمد علی علی
محمد علی علی
محمد علی علی

**IN THE COURT OF MUHAMMAD HANIF SENIOR CIVIL JUDGE
(ADMIN)/MTMC, BATTAGRAM**

State vs Zubair etc

Case No. 2/2-GBV of 2022

<p>Or 15 22-09-2022</p> <p>Certified U/A 87 of the O.C.S Order 1984</p> <p>Examiner District & Sessions Judge Battagram</p> <p>9.8.23</p> <p>MUHAMMAD HANIF Senior Civil Judge Battagram</p>	<p>Mr. Abbas Ali learned APP for the state present. Accused (1) Muhammad Zubair Khan, (2) Saif Ullah, (3) Sabawoon Khan, (4) Munir Ullah, (5) Bakhtiar Muhammad, (6) Abdul Wahab Shah, (7) Amir Ur Rehman, (8) Murshid Alam, (9) Sher Muhammad Khan, (10) Muhammad Asad Khan, (11) Muhammad Siddique Khan, (12) Sheharyar Khan, (13) Asghar Hayat Khan, (14) Raja, (15) Shah Feroz, (16) Khurshid Ahmad, (17) Atta Ur Rehman, (18) Abdul Aziz, (19) Ikram Ullah and (20) Syed Riaz Hussain Shah on bail alongwith counsel Mr. Rasool Khan Advocate and Mr. Nizam Ullah Khan Advocate present. Complainant Miss Zohra Begum alongwith co-complainants namely Mst. Tahira Bibi and Mst. Shabnam also present.</p> <p>At the very outset, the parties stated at the bar that they have compounded the matter with the intervention of their elders, in the best interest of the institution and have buried all the differences. They also submitted a compromise deed containing certain terms and conditions of the compromise. In this respect, joint statement of the parties is recorded wherein they verified the contents of compromise deed, which is taken on file as Ex. PA. The complainants tendered their no-objection on acquittal of accused. It was further submitted that the complainants have pardoned the accused for their excesses in the name of Allah Almighty. They also produced copies of their CNICs as Ex. PB to Ex. PX. The parties requested for acquittal on the basis of compromise.</p> <p>The offences attributed to the accused are compoundable according to 06th Column of 2nd Schedule of the Code.Criminal Procedure (Act-V of 1898). The compromise is also in the best interest of the parties and their institution as they are in the service of Education Department. Hence,</p>
--	--

ATTESTED

22

15

**IN THE COURT OF MUHAMMAD HANIF SENIOR CIVIL JUDGE
(ADMIN)/MTMC, BATTAGRAM**

State vs Zubair etc

Case No. 2/2-GBV of 2022

Or 15 22-09-2022	<p>keeping in view the compromise deed followed by joint statement of the parties, the accused facing trial are hereby acquitted u/s 345 Cr. PC and their sureties are discharged from the liabilities of bail bonds. No case property is mentioned in the challan, therefore, no order for case property is required.</p> <p>File be consigned to Record Room after its necessary completion and compilation.</p> <p>Announced: 22/09/2022</p>																		
<table border="1"> <tr><td>C.D-1No</td><td>1871</td></tr> <tr><td>Date of Presentation</td><td>9.8.23</td></tr> <tr><td>Court fee</td><td></td></tr> <tr><td>Urgent</td><td></td></tr> <tr><td>Tort</td><td></td></tr> <tr><td>Misc</td><td></td></tr> <tr><td>Unit</td><td>9.8.23</td></tr> <tr><td>Case No</td><td>9.8.23</td></tr> <tr><td>Date of</td><td></td></tr> </table>	C.D-1No	1871	Date of Presentation	9.8.23	Court fee		Urgent		Tort		Misc		Unit	9.8.23	Case No	9.8.23	Date of		<p>MUHAMMAD HANIF Senior Civil Judge (Admin)/MTMC, Battagram</p>
C.D-1No	1871																		
Date of Presentation	9.8.23																		
Court fee																			
Urgent																			
Tort																			
Misc																			
Unit	9.8.23																		
Case No	9.8.23																		
Date of																			
	<p>Certified true & correct copy of the Order of 9.8.23</p> <p>Exam 9.8.23 District & Sessions Judge Battagram</p>																		

ATTESTED

23

Handwritten notes and signatures at the top left, including a circled number 64 and some illegible text.

State VS Zubair etc

Case No. 2/2-GBV of 2022

Joint statement of (1) Mst. Zohra Begum w/o Asad Iqbal DEO (Female), aged about 44/45 years (complainant), (2) Mst. Bibi Tahira w/o Akhtar Nawaz, aged about 44/45 years, r/o Batamori, (3) Mst. Shabnam d/o Ghulam Yousaf, aged about 30/31 years, r/o Malkal Gali (PWs), (4) Muhammad Zubair Khan s/o Esa Khan aged about 60/61 years, r/o Batamori (5) Saif Ullah s/o Sher Ali Khan, aged about 37/38 years, r/o Dehri Bahadar Khan, (6) Sabawoon Khan s/o Akhtar Hayat Qamar, aged about 33/34 years, r/o Dehri Bahadar Khan, (7) Munir Ullah s/o Murshid Alam, aged about 54/55 years, r/o Paimal Sharif, (8) Bakhtiar Muhammad s/o Rahim Dad, aged about 37/38 years, r/o Tamai, (9) Abdul Wahab Shah s/o Amir Nawab Shah, aged about 51/52 years, r/o Bilandkot, (10) Amir Ur Rehman s/o Muhammad Rahim, aged about 55/56 years, r/o Civil Hospital Colony, (11) Murshid Alam s/o Muhammad Shoaib, aged about 30/31 years, r/o Chappergram, (12) Sher Muhammad Khan s/o Sher Bahadar Khan, aged about 44/45 years, r/o Thakot, (13) Muhammad Asad Khan s/o Zeenat Khan, aged about 35/36 years, (14) Muhammad Siddique Khan s/o Muhammad Younas Khan, aged about 47/48 years, r/o Shamlai, (15) Sheharyar Khan s/o Shah Iran, aged about 24/25 years, r/o Peshora, (16) Asghar Hayat Khan s/o Umar Hayat Khan, aged about 26/27 years, r/o Faiz Abad Battagram, (17) Raja Khan s/o Faqeer Muhammad, aged about 54/55 years, r/o Batamori, (18) Shah Feroz s/o Muhammad Inam, aged about 56/57 years, r/o Peshora, (19) Khurshid Ahmad s/o Afareen Khan, aged about 42/43 years, r/o Sandasary, (20) Atta Ur Rehman s/o Abdul Matin, aged about 39/40 years, r/o Jesol Bazar, (21) Abdul Aziz s/o Rahim Khan, aged about 31/32 years, r/o Matta Torkhail Kuzabanda, (22) Ikram Ullah s/o Aman Ullah, aged about 34/35 years, r/o Ajmera, (23) Syed Riaz Hussain Shah s/o Nawab Syed, aged about 52/53 years, r/o Ghari Nawab Syed, (accused), Castes Swati, Tehsil & District Battagram stated:

That we have effected compromise with each other with the intervention of our elders from District Battagram and Swabi and we have agreed upon to compound the matter as terms and conditions of the compromise deed duly executed between the parties. The compromise deed is Ex. PA and the complainant Mst. Zohra Begum, has forgiven the accused facing trial in the name of Allah Almighty. The compromise is genuine and free from any duress or coercion, which is in the best interest of parties. The complainant has got no-objection on acquittal of the accused on the basis of compromise. We also produce copies of our CNICs which are Ex. PB to Ex. PX. It is therefore, requested that the compromise may please be accepted.

MUHAMMAD HANIF
Senior Civil Judge
Battagram
R.O. & AC
22-09-2022

1. Mst. Zohra Begum (Complainant):
CNIC# 17101-0293563-6

Handwritten signature and date 22/9/2022, along with a stamp: Certified U/A of the Q-e-s order 1984

ESTATED

Page 1 of 3
Framin 9.8.2
District & Sessions Judge
Batgram

24

65

State VS Zubair etc
Case No. 2/2-GBV of 2022

2. Mst. Bibi Tahira (PW): _____
CNIC# 13202-0727605-6

3. Mst. Shabnam (PW): _____
CNIC# 13202-2351885-0

4. Muhammad Zubair Khan (Accused): _____
CNIC# 13202-0739079-9

5. Saif Ullah (Accused): _____
CNIC# 13202-0923039-5

6. Sabawoon Khan (Accused): _____
CNIC# 13202-7665879-1

7. Munir Ullah (Accused): _____
CNIC# 13202-0723414-9

8. Bakhtiar Muhammad (Accused): _____
CNIC# 13202-5656054-3

9. Abdul Wahab Shah (Accused): _____
CNIC# 13202-0758832-9

10. Amir Ur Rehman (Accused): _____
CNIC# 13202-0771253-3

11. Murshid Alam (Accused): _____
CNIC# 13202-2923110-1

12. Sher Muhammad Khan (Accused): _____
CNIC# 13202-0768803-1

13. Muhammad Asad Khan (Accused): _____
CNIC# 1322020-335248-7

14. Muhammad Siddique Khan (Accused): _____
CNIC# 13202-0785169-5

15. Sheharyar Khan (Accused): _____
CNIC# 13202-9675492-7

16. Asghar Hayat Khan (Accused): _____
CNIC# 13202-6377728-7

17. Raja Khan (Accused): _____
CNIC# 13202-0776838-9

Certificate No. 87 of the
Q-3 of 1984

[Signature]
District & Sessions Judge
Bhagwal

ATTESTED

25

66

State VS Zubair etc
Case No. 2/2-GBV of 2022

18. Shah Feroz (Accused):
CNIC# 13202-9937960-1

19. Khurshid Ali (Accused):
CNIC# 13202-0757473-3

20. Atta Ur Rehman (Accused):
CNIC# 13202-9769551-3

21. Abdul Aziz (Accused):
CNIC# 13202-2221342-5

22. Ikram Ullah (Accused):
CNIC# 13202-0155466-7

23. Syed Rinz Hussain Shah (Accused):
CNIC# 13202-0755508-3

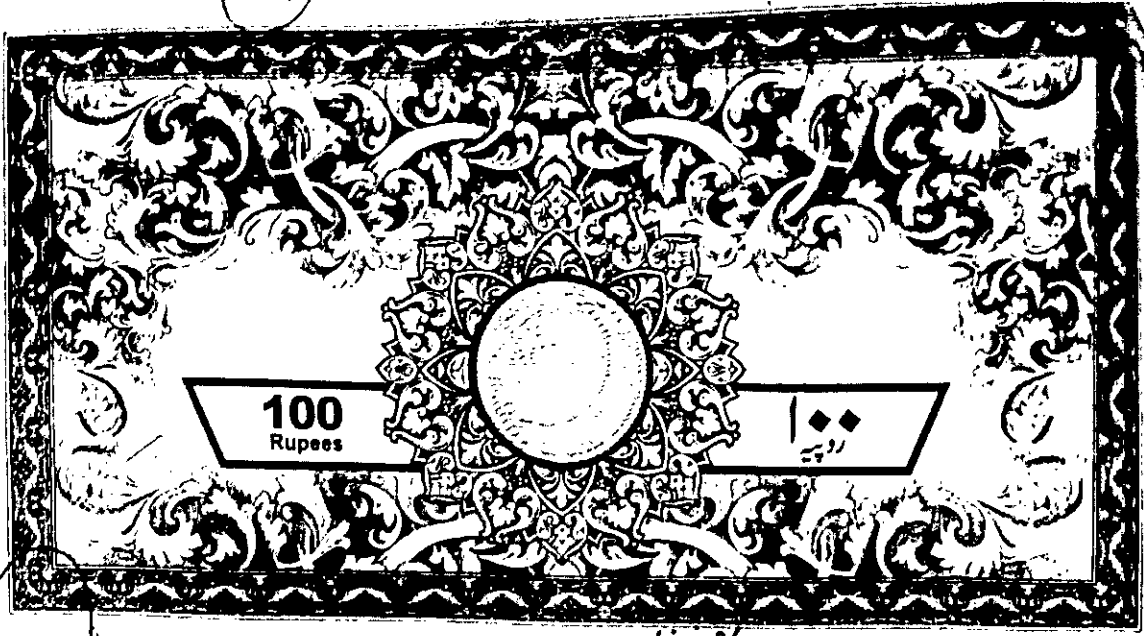
Muhammad Hanif
Senior Civil Judge (Admin)/MTMC,
Bafagram

MUHAMMAD HANIF
Senior Civil Judge
Bafagram

06
Certificate No. 27 of the
Court Order 1983

[Signature]
District & Sessions Judge
Bafagram

ATTESTED



ET P
(Admin) / MTRC
(BM)
22/09/2022

راہنی نامہ

یہ راہنی نامہ سجادہ زبیرہ بیگم - مدیم طاہرہ - مدیم شبنم (فریق اول) کو
اور محمد زبیر - سفیر اللہ - راجن حسین شاہ - عبادون - احمد فیاض خان (فریق دوم)
کو درج ذیل درجہ داران کے طور پر 13 ستمبر بروز منگل 2022ء کو دونوں فریقین کے درمیان
درج ذیل پرکھانے کے روپوں کے طے کیا۔

Handwritten notes and signatures on the right side of the document.

1. اندھ لکھی بھی انصہر لکھی اس طرح کا اوپر نہ رکھنے کے بائیں اور انصہر کو اس کے عہد کے مطابق عزت دینے کے عہد کرتے ہیں۔
2. ہم اس بات کی عہد کرتے ہیں کہ وہ تعلیم میں کام کرنے والی خواہش کے عزت اور انصہر ہم یعنی بنائے۔
3. ہم اس سے ترنگل پر شہر مندہ ہیں اور مدیم زبیرہ سے درخواست کرتے ہیں کہ اندھ لکھی پر لکھی شہر مندہ۔
4. اس لکھی کے متعلق اور مدیم زبیرہ اور ان کے ساتھ انصہر کے متعلق لکھی بھی خود لکھی بات نہ کرے۔
5. مدیم زبیرہ وعدہ عدلی کی صورت میں لکھی ری اڈین کرنے کا حق محفوظ رکھتی ہے۔

Handwritten notes on the right side, including 'جز مہنگو'.

یہ راہنی نامہ روپوں کے روپوں کے ساتھ لکھی ہے۔

_____ مدیم طاہرہ _____
 _____ سفیر اللہ _____
 _____ محمد زبیر _____
 _____ احمد فیاض خان (فریق دوم) _____
 _____ عبادون _____

Central Bank of India
 Certificate No. 87 of 1984
 dated 13 September 1984

_____ Munsiff Judge _____
 _____ عبادون _____

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فارم نمبر ۲۳-۵ (۱)

کاؤنٹر فائل

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۳ مجموعہ ضابطہ فوجداری

مقام	ضلع	تاریخ
۴۶	ضلع گرام	۳۱/۷/۲۰۲۱
نمبر	عقلم	۲۹۹

۱-	تاریخ و وقت رپورٹ	۰۵-۰۷-۲۰۲۱	۱۳:۰۰ بجے	جاگیرگی ۱/۲، ۵/۸، ۵ صوبہ ۱۱/۱۵
۲-	نام و سکونت اطلاع دہندہ مشفیٹ	سماہ ظہیر بیگم	DEO فی میل گرام	
۳-	مختصر کیفیت جرم (موزلفہ) حال اگر کچھ لیا گیا ہو۔	زبردستی	۵۰۹-۱۴۷-۵۰۶	
۴-	جائے وقوعہ فاصلہ مقام سے اور سمت	DEO فی میل گرام	طانب شمال	بھلا صم اعلیٰ سیر از مقام
۵-	نام و سکونت ملزم			
۶-	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو اور وجہ بیان کرو	سیر نمبری ۱۷۷۲	۱۷۷۲	۳۱/۷/۲۰۲۱
۷-	مقام سے روانگی کی تاریخ و وقت	نوشین ڈاک		

ابتدائی اطلاع نیچے درج کردہ۔ حرح ۲۱/۸ ق کو سوانا ستیہ
 صدر جہ خانہ نمبر ۲ سیر نمبری ۱۷۷۲ فورم ۲۱/۷/۲۰۲۱ بواسطت اخراج باہر اذرف
 ۲۵ نو طرمان درساں کن اور ظہیر بیگم کی دھکیاں دینے کے اندر
 صفہ وصول ہوا جس پر ظہیر بیگم نے مدد سے ۱۴۹-۵۰۹-۵۰۶
 پوچھا تو ظہیر بیگم نے لٹو طانب نے صفہ درج رپورٹ کے نکل ۱۷۷۲ کے تفتیش
 درج INL سٹاف کے پوچھا تو ظہیر بیگم نے صفہ قائم کر کے نکل ۱۷۷۲ سے صفہ کاغذات
 رائے تفتیش درج INL سٹاف کے طانب جس سیر نمبری ۱۷۷۲ زیل ۱۷۷۲ کے تفتیش

office of the District Education Officer
 No. 95, BTG
 5.8-2021 (Female) Battagram. Endsit no 177a. dated
 31-07-2021. District Police Officer (DPO) Battagram
 Subject Harassment of Female Staff by male Staff
 of DEO Female Battagram. R/s reference to the subject
 cited above it is stated that the male staff (list attached)
 of this office have threaten the female officer such as
 ASDEO Battagram and ASDEO Battagram and harass
 them to the serious extent their (Application)
 and threatening letter are attached for read
 reference) Hence your good self is requested that
 FIR may kindly be logged against all of them and
 necessary security may also be provided to all female
 staff of this office. P = T = 0

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- List of Employees against whom FIR may be logged DEO Female office
- 1:- Mr. Zubair (Budget and Account Officer)
 - 2:- Mr. Sajjida (AEDO P & D)
 - 3:- Mr. Sabir Khan (AEDO)
 - 4:- Mr. Munirullah (SC)
 - 5:- Mr. Bakhtyar Khan (JC)
 - 6:- Mr. Wahab Shah (Assistant)
 - 7:- Amir Raza Khan (Assistant)
 - 8:- Star Muhammad (JC)
 - 9:- Nurshid Khan (Computer operator)
 - 10:- Asad Khan (Computer operator)
 - 11:- Sadiq Khan (SC)
 - 12:- Khariyar Khan (SC)
 - 13:- Asghar Hayat Khan (JC)
 - 14:- Raja Khan (Assistant)
 - 15:- Shah Feroz (Dy. Officer)
 - 16:- Khursid Ahmad (JC)
 - 17:- Riaz Hussain Shah
 - 18:- Attaur Rahman (JC)
 - 19:- Abdul Agaz (JC)
 - 20:- Akramullah (JC) SD District Education Officer (F) Battagram - ضاب عالی!

نقل بطریق اصل
Raza Khan

Muz. P.S. B.T.S.
5-8-2021

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اطلاع کے نیچے اطلاع دہندہ کا دستخط ہوگا یا اس کی مہر یا نشان لگا یا جاریے گا۔ اور اس پر تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔ حروف الف بیا ب مزخ روشانی سے بالقابل نام: ایک لازم یا شہر علی الترتیب واسطے باشندگان علاقہ غیر یا وسط ایشیا یا افغانستان جہاں موزوں ہوں، لکھنا چاہئے۔



Order.

Services of Mr. Murshid Alam Computer Operator (BPS-16) DEO (Male) is hereby placed at the disposal of District Education Officer (Female) for further adjustment with immediate effect in the best interest of public service.

1. Compliance report should be submitted to all concerned.

1. Compliance report should be submitted to all concerned.
2. No TA/DA is allowed.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 2706-10 /F.No. /A-23/MS/Murshid Alam P.F.

Dated Peshawar the 5/1 /2023

Copy forwarded to the: -

1. District Education Officer Concerned
2. District Accounts Officer concerned
3. Official concerned.
4. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Master File.

for Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

5/1/23

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**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

(Phone # 0997-310460)

E-mail: demisfbattagram@yahoo.com

ADJUSTMENT ORDER

In compliance with the Director E&SE Khyber Pakhtunkhwa vide No. 2706 /P.No. / A-23/MS/Murshid Alam P.P dated Peshawar the 05.05.2023, Mr. Murshid Alam CO B-16 is hereby adjusted in the office of the undersigned against the post of Computer Operator w-e from 05.05.2023 and Mr. Aasid Khan CO is hereby adjusted against the Post of AP (Assistant Programmer) on his own pay and grade in office of the undersigned in the best interest of public with immediate effect.

- Notes:
1. Charge report should be submitted to all concerned
 2. No TAD is allowed.

District Education Officer (F)
Dattagram

Endst No. 1379-84 EB/Sec/Transfer/ Dated: 07/05/2023

Copy for information to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar
2. District Account Officer Dattagram
3. District Monitoring Officer Dattagram
4. Official concerned
5. EMIS Local Office
6. Office file

District Education Officer (F)
Dattagram

7/5/2023

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DEO (F)



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
DISTRICT BATTAGRAM



cmdbattagram@gmail.com



0997843540 & 539



No. 3011-1/F. No. J/EMS/PCPI/2023-24, Dated: 28/04/2023

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To, ✓ The Director
E&SE Khyber Pakhtunkhwa Peshawar

Subject: COMPLAINT REGARDING ARRIVAL AND COMPLIANCE OF TRANSFER ORDER ISSUED BY DIRECTORATE OF E&SE KHYBER PAKHTUNKHWA PESHAWAR.

Reference to the complaint lodged through Pakistan Citizen Portal vide No. KP130423-00648173 dated 13/04/2023 received from your good office, wherein the complainant went to know about the compliance of the transfer order issued vide good office Enclt No. 2455-00/F. No. A-23A/S/Posting Transfer/2021/ Vol-1 dated 31/03/2023. The detail of arrival/compliance of the officials transfer under aforesaid order are hereby submitted for your kind information as well as for information of the complainant please.

S. NO.	NAME & DESIGNATION	FROM	TO	REMARKS
1	Mr. Tajuddin Saeed Clerk	GHSS Palmal Sharif	DEO Battagram (F)	Relieved off from his duties by the concerned school
2	Mr. Muhammad Sharif S/Clerk	DEO Battagram (F)	GHSS Palmal Sharif	Assumed the charge and applied for 20 days Earned Leave
3	Haq Nawaz S/Clerk	SDEO Alal (F)	DEO Battagram (F)	May be confirmed from DEO (F) Battagram
4	Abdul Waheed S/Clerk	SDEO Battagram (F)	SDEO (F) Alal	May be confirmed from DEO (F) Battagram
5	Zahoor Ahmad S/Clerk	GHSS Kheria Pur Alal	GCMHS Battagram	Assumed the charge
6	Muhammad Noman S/Clerk	GHSS Thakot	GHSS Kheria Pur Alal	Still working at previous station
7	Kayal Muhammad S/C	GCMHS Battagram	GHSS Thakot	Still working at previous station
8	Sharif Ullah J/C	SDEO Battagram (F)	GHS Blendkot	Still working at previous station
9	Nashara Khan J/C	SDEO Battagram (M)	SDEO Battagram (F)	Still working at previous station
10	Shoukat Ali Khan J/C	GHS Blendkot	SDEO Battagram (M)	Still working at previous station
11	Muz Ull Haq J/C	SDEO Battagram (M)	SDEO Battagram (F)	Still working at previous station
12	Amir Ur Rahman Assistant	DEO Battagram (M)	SDEO Battagram (F)	Relieved by DEO (M) Battagram
13	Shahideen Assistant	SDEO Battagram (M)	DEO Battagram (M)	Assumed charge at DEO (M) Battagram
14	Abdul Razaq Assistant	DEO Battagram (M)	DEO Battagram (F)	Relieved by DEO (M) Battagram
15	Syed Riaz Hussain Shah Assistant	DEO Battagram (F)	DEO Battagram (M)	Still working at previous station
16	Murad Alam C/O	DEO Battagram (F)	DEO Battagram (M)	Absent after arrival, absence report already submitted

District Education Officer (M)
Battagram

Even No & Date.
Copy for information to the /

1. Deputy Commissioner Battagram
2. District Monitoring Officer (EMA) Battagram
3. Assistant Director (Complaint) Directorate of E&SE Khyber Pakhtunkhwa Peshawar
4. Office File.

District Education Officer (M)

ATTENDED

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
BATTAGRAM

EMAIL: emisbattagram@gmail.com PHONE NO:0997543540 &539



No. _____ DATED: _____

To

The Director
E&SE Khyber Pakhtunkhwa, Peshawar.

Subject: **ABSENT REPORT IN R/O MR. MURSHID ALAM COMPUTER OPERATOR:**

Memo:

Reference to the transfer order issued vide the Directorate of E&SE Khyber Pakhtunkhwa bearing No.2455-60 dated:31/03/2023 in r/o Mr. Murshid Alam Computer Operator from DEO (F) Battagram to DEO (M) Battagram.

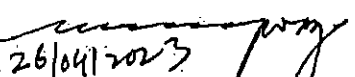
The official submitted his arrival report in this office on 14/04/2023 but he has been remained absent since then without any permission. The report is hereby submitted for further necessary action please.

DISTRICT EDUCATION OFFICER (M)
BATTAGRAM

Endst: No. 2841-43 Dated: 26-04-23

Copy for Information to:

1. District Education Officer (F) Battagram.
2. District Account Officer Battagram.
3. Office copy.


26/04/2023
DISTRICT EDUCATION OFFICER (M)


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