


# FORM OF ORDER SHEET

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

**Appeal No. 1446/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12-Sep-24	<p>The appeal of Mr. Abdullah today by Mr. Anwar Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Swat on 08-Oct-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Abdullah received today i.e on 13.08.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Copy of appointment order dated 01.03.2017 mentioned in the memo of appeal is not attached with the appeal be placed on it.
- 4- Copies of enquiry reports mentioned in the memo of appeal are not attached with the appeal be placed on it.
- 5- Annexure-B, C, H, I, J & K of the appeal are illegible be replaced by legible/better one.
- 6- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 627 /Inst./2024/KPST,

Dt. 15/8 /2024.

*Anwar Ali Khan*  
OFFICE ASSISTANT  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Anwar Ali Khan Adv.  
High Court at Peshawar.

Respected Sir,

Resubmitted after fulfilling the requirements and removal of objections.

Appointment order dated 01.03.2017 has been attached as Annex "C".

Inquiry reports mentioned in para No. 4 of the objection has not been provided to the appellant.

Re-submitted after necessary completion. Delay, if any may kindly be condoned.

*A Y P*  
Counsel for the appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.  
PESHAWAR

Service Appeal No. 1446 / 2024

Abdullah (Watchman/chowkidar)..... Appellant

Versus

Govt. of Khyber Pakhtunkhwa through Secretary Elementary  
and Secondary Education, Peshawar and others..... Respondents

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1.	Service appeal.		1-7
2.	Affidavit.		8
3.	Application for suspension of impugned order with affidavit.		9
4.	Copy of the agreement dated 12.06.2004	A	10
5.	Copy of appointment letter dated w.e.f 01.03.2017	B	11
6.	Copy of appointment letter dated 03.05.2006 of Hamid Ullah and another	C	12
7.	Copy of another agreement dated 22.06.2012	D	13
8.	Copy of the application to EDO (F) Chitral Lower.	E	14
9.	Copy of FIR No.345 dated 07.08.2023	F	15
10.	Relevant documents.	G-H	16-18
11.	Copy of the impugned order dated 13.03.2024 of the respondent No.2 and impugned order dated 27.03.2024 of the respondent No.4	I-J	19-20
12.	Copy of the departmental appeal dated 16.4.2024	K	21-22
13.	Wakalatnama.		23

Through

*Shi*  
Appellant

*AKK*  
Anwar Ali Khan  
Advocate, High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. 1446.....2024

Khyber Pakhtunkhwa  
Service Tribunal

Entry No. 14946

Dated 13-08-2024

Abdullah (Watchman/chowkidar)  
Govt. Girls Higher Secondary School,  
Shiaqotek, District Chitral Lower..... Appellant

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. Director Elementary and Secondary Education, KPK, Peshawar.
3. District Education Officer (Female), Chitral Lower.
4. Principal Govt. Girls Higher Secondary School, Shiaqotek, Chitral Lower..... Respondents

**SERVICE APPEAL U/S 04 OF THE SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED ORDER DATED 13.03.2024 OF THE RESPONDENT No.2 AND IMPUGNED ORDER OF RECOVERY DATED 27.03.2024 OF THE RESPONDENT No.4, RECEIVED ON DATED 09.04.2024, AND AGAINST INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL DATED 16.04.2024 OF THE APPELLANT WITHIN STATUTORY PERIOD.**

**PRAYER:**

**ON ACCEPTANCE OF THE INSTANT APPEAL, THE IMPUGNED ORDER DATED**

**13.03.2024 OF THE RESPONDENT No.2 AND  
IMPUGNED ORDER OF RECOVERY  
DATED 27.03.2024 OF THE RESPONDENT  
No.4, RECEIVED ON 09.04.2024 AND THE  
RESPONDENTS MAY KINDLY BE  
RESTRAINED FROM MAKING SUCH  
ILLEGAL AND UNLAWFUL RECOVERY  
FROM THE APPELLANT.**

*Respectfully Sheweth:*

1. That the respondents acquired highly valuable land measuring 02 Kanals for construction of Govt. Girls High School Shiaqotek, Chitral Town, District Chitral Lower and in consideration agreed to appoint family members of the appellant's father or his nominated persons in all the sanctioned posts of Class-IV, sanctioned for the said school or on its up gradation vide contract dated 12.06.2004 and appointed the appellant as chowkidar vide order dated w.e.f 01.03 2017 and brother of the appellant namely Hamid Ullah as Chowkidar vide order 3.5.2006. Later on the respondents acquired another patch of land measuring 04 Kanals for construction of Govt. Girls Higher Secondary School, Shiaqotek, District Chitral, Lower. (Copy of the agreement dated 12.06.2004 and appointment letter dated w.e.f 01.03.2017 of the appellant and appointment letter dated 03.05. 2006 of Hamid Ullah and another agreement dated 22.6.2012 are Annexure "A to D" respectively).
2. That since the appointments, the appellant and his brother are performing their duties in GGHS and GGHSS Shiaqotek Chitral honestly, diligently and upto the entire satisfaction of the superiors.

3. That it is pertinent to mention here that on the other side of the main road there is an Old Govt. Girls Middle School, located at a distance of about 200 meters from the said GGHS School, with separate class-IV staffs, and in the year 2021 an International NGO (WISH) constructed a youth center in the premises of the said Govt. Girls Middle School and after completion of the construction, the said center remained under the supervision and use of the Respondent No.4.
4. That the said Govt. Girls Middle School has its own watchman and Class-IV staffs and the youth center also locates within the premises/ boundry wall of the said school, and suddenly for unknown reasons, when respondent No. 4 verbally ordered the appellañt to take charge of watchman of the said middle school, the appellant requested and wrote an application with valid justifications to the respondent No.3, that it is practically impossible for the appellant to attend two different places at the same time , because the said Govt. Girls Middle School is located away from the duty place of the appellant and the appellant is the chowkidar specifically of Govt Girls High School and Govt. Girls Higher Secondary School and it is illegal to take duty from the employee around the clock, but instead of arranging watchman, the respondent No. 3 and 4 sent the appellant for duty in the Deputy Commissioner Office, District Chitral Lower, where the appellant performed duties from morning till night for many months, which shows the arbitrary exercise of power as well as negligence by the defendant No. 3 and 4. (Copy of the application is Annexure E).
5. That in this way, the respondent No. 3 and 4 left the said Middle school without watchman for about two years , then on August 07, 2023 it was discovered that allegedly theft committed in the youth centre located in the premises of the said Middle school and many equipments were missing and a FIR was registered against unknown persons and during investigation the house of the

appellant was raided and the police tortured the appellant and his brother namely Hamid Ullah (Chowkidar) in the police station since morning till night, and then when the prosecution reached to the conclusion that the allegations are baseless and without evidence and having no probability of conviction, submitted challan for cancellation of FIR and the learned judicial magistrate disposed off the case accordingly vide order dated 23.04.2024. (Copy of the FIR and other relevant record of the said case are enclosed as Annexure F to H).

6. That in the meantime, departmental inquiry started and an inquiry officer was appointed who made a nominal inquiry and submitted report by saying that theft had committed because of the negligence of the appellant and his brother, however, the competent authority subsequently constituted an inquiry committee and the committee also made nominal inquiry only from the appellant and his brother (Chowkidar) without framing a proper charge sheet, statement of allegations and without issuing show cause and without recording statement of a single witness, and relying on the earlier inquiry officer's report based on surmises and assumptions, and by resorting to the story made by the respondent No.4, and again wrongly held that the alleged negligence on the part of the appellant was the cause of the incident and made the appellant and his brother (Chowkidar) scapegoat and put all the debris on them in order to save the skin of all the responsables.
7. That it is worth to mention here that the departmental inquiry committee did not interrogate the class-IV staff, clerical staff, teachers, principal and the students of the Govt. Girls Middle School where the community Youth Centre locates and which was under their charge and use.
8. That the respondent No. 2, on the basis of the said so called nominal inquiry report, through impugned order dated 13.03.2024

and in continuation of the same the respondent No.4 through impugned order dated 27.03.2024 ordered the appellant and his brother to deposit Rs.3400000/- the cost of the alleged stolen items immediately. The appellant received the said order on dated 09.04.2024, followed by many other letters just to harass and embarrass the appellant. (Copy of the impugned order dated 13.03.2024 of the respondent No.2 and impugned order dated 27.03.2024 of the respondent No.4 are annexed as I & J).

9. That the appellant feeling aggrieved, preferred a **departmental appeal on dated 16.04.2024**, against the impugned orders which was not responded within statutory period. (Copy of the departmental appeal dated 16.4.2024 is annexed as Annexure K).
10. That, feeling aggrieved, the appellant approaches this Hon'ble court on the following grounds inter alia;

GROUND:

- A. That the actions, inaction and omissions of the respondents are illegal, unlawful, void, and against norms of natural justice, hence liable to be set-aside.
- B. That before passing the impugned orders, no show cause, charge sheet and statement of allegations were issued to the appellant.
- C. That the respondents have acted in arbitrary manner while issuing the impugned order and accordingly is the result of fanciful exercise of power by the respondents.
- D. That the impugned orders are based on malafide and just to hide their own negligence and to save the skins of actual responsible officials.
- E. That the impugned orders are based on surmises and conjectures.



- F. That, it is an admitted fact that the appellant is appointed as chowkidar specifically for the Govt. Girls High School and Govt. Girls Higher Secondary School and not of the said Govt. Girls Middle School where the alleged theft took place.
- G. That the appellant being chowkidar of the GGHS and GGHSS, located at different and distant place from the said middle school, has never performed service as chowkidar in the said middle school.
- H. That the appellant being chowkidar of the GGHS and GGHSS was not the chowkidar or under the responsibility or charge of watchman of the said middle school or the equipments inside the community centre at the time of alleged occurrence.
- I. That the appellant's father being illiterate villager farmer, the Respondents No.1 to 4 had acquired about six kanal agricultural land worth of Crores Rupees for the construction of the Govt. Girls High School and Higher Secondary School without paying a single penny in consideration of class-IV posts in the said school and now with intent to harass and terminate the appellant and to undo the said agreements conspired and put the instant false and baseless charges of negligence on the appellant and constantly harassing and embarrassing the appellant through different modes and manner.
- J. That the codal formalities have not been fulfilled while passing the said impugned orders against the appellant which is a gross violation of Article 10-A of the constitution 1973.
- K. That the principles of natural justice have been contravened by the respondents while passing the impugned orders.
- L. That the impugned orders are erroneous and not sustainable in the eye of law.

- M. That the impugned orders are based on assumptions and without an iota of proof against the appellant.
- N. That when the prosecution reached to the conclusion that the case is baseless and there is no probability of conviction, withdrawn its case by cancellation of FIR.
- O. That any other ground will be raised at the time of arguments with kind permission of this Hon'ble court.

It is therefore, most humbly prayed that on acceptance of the instant appeal, the impugned order dated 13.03.2024 of the respondent no.2 and impugned order of recovery dated 27.03.2024 of the respondent no.4, received on 09. 04.2024, may kindly be set-aside and the respondents may kindly be restrained from making such illegal and unlawful recovery from the appellant.

Any other relief not specifically asked for which this Hon'ble court may deems fit in the circumstances, may also be granted for the ends of justice.

Through

*Rh.*  
Appellant

*AGP*  
Anwar Ali Khan  
Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

S.Appeal No. \_\_\_\_\_ 2024

Abdullah, Chowkidar GGHS Shiaqotek Chitral Lower..... "Appellant"  
Versus

Govt of KP through Secretary Elementary and Secondary Education  
(E&SE) Department Peshawar and others....."Respondents"

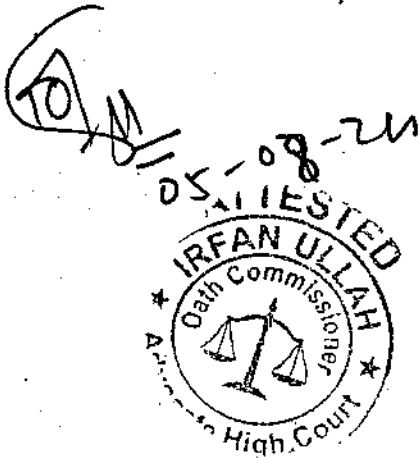
AFFIDAVIT:

I Mr. Abdullah son of Akbar Khan R/o Shiaqotek Tehsil and District  
Chitral Lower, do hereby solemnly affirm and declare that the contents of  
the instant **Service Appeal** are true and correct to the best of my knowledge  
and belief and nothing has been concealed from this Hon'ble Tribunal.

*Sh.*

Deponent

CNIC No.15201-1333533-9



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.  
PESHAWAR

Service Appeal No. \_\_\_\_\_ / 2024

Abdullah (Watchman/chowkidar)..... Appellant

Versus

Govt. of Khyber Pakhtunkhwa through Secretary Elementary  
and Secondary Education, Peshawar and others..... Respondents

Application for suspension of operation of the  
impugned order of recovery dated 13.03.202 and  
dated 27.03.2024 and other subsequent orders of the  
respondents in continuation of the same.

Respectfully Sheweth:

1. That the applicant/appellant has a prima facie case and is sanguine for its success.
2. That balance of convenience also lies in favor of the appellant.
3. That if the impugned orders are not suspended, the applicant/appellant suffer irreparable loss.
4. That the suspension of the impugned orders is utmost necessary for the ends of justice.
5. That the contents of the main appeal may kindly be considered as part and parcel of the instant application.

It is, therefore, most humbly prayed that on acceptance of the instant application, the said impugned orders may kindly be suspended till the final disposal of the accompanying appeal.

Through

*Rh.*  
Appellant

*AG*  
Anwar Ali Khan  
Advocate, High Court

AFFIDAVIT:

I, do hereby solemnly affirm and declare on oath that the contents of the instant application are true and correct and nothing has been concealed from this Hon'ble Tribunal.

*Rh.*  
Deponent



ATTACHED

*[Faint handwritten notes and scribbles]*

Records District Office  
Edu. Lt. Chiral  
Ego 5871 Chiral

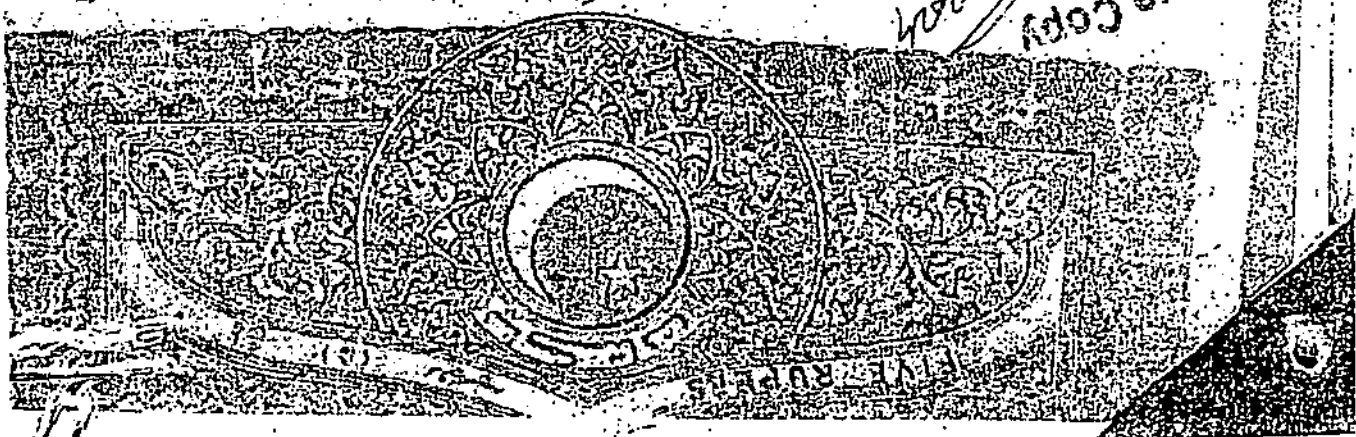
Assistant Dist.  
Officer (P&D)  
Edu. Lt. Chiral

Ms. M  
District Office (Female)  
Edu. Lt. Chiral  
Chiral C. 98

*[Handwritten note]*  
... for ...

*[Large block of handwritten text, possibly a letter or report, written in a cursive script]*

True Copy  
Ms. M  
Advocate High Court &  
Federal Shariat Court  
Multan Bench



Annexure  
"A"

(10)



11

Annexure  
"B"

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER S&L CHITRAL**  
**OFFICE ORDER**

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following Class IVs is hereby ordered in fixed pay Rs. 3500/- PM with effect from the date mentioned against each, in the interest of public service, subject to the terms and conditions noted below:-

No	Name/ parentage & address	Office/School	Post	Effective from	Remarks
	Sikandar Khan S/O Qurban R/O Seenlasht	GGMS Seenlasht	NQ	1.4.2006	Against newly created V. post.
	Mst. Nujma Bibi D/O Hakim R/O Seenlasht	GGMS Seenlasht	Sweeper	1.4.2006	-do-
	Hamidullah S/O Akbar Khan R/O Shingotak	GGHS Shingotak	Chow:	1.4.2006	-do-
	Mst. Asia W/O Akbar Khan R/O Shingotak	-do-	L.Aidit:	1.4.2006	-do-
	Ubbullah S/O Zawani R/O Parabej	GGHS Parabej	Chow:	1.4.2006	-do-
	Ibrahim Khan S/O Dinar Bag.	-do-	L.Aidit:	1.4.2006	-do-
	Abdur Rahman S/O Youmas Oadir, S/Rech	GMS S/Rech	N/Q	1.4.2006	-do-
	Abdur Rahim S/O Youmas Qadir, S/Rech	-do-	Sweeper	1.4.2006	-do-
	S. Hasan, Wali Shah S/O Ghulam Habib, Istara	GGHS Werkup	L.Aidit:	1.4.2006	-do-
	Habibur Rahman S/O Meht Allah R/O Werkup	GGHS Werkup	Chow:	1.4.2006	-do-
	Muhoob ALI Shah S/O Bawal Khan R/O Mastuj	GGHS Mastuj	Chow:	1.4.2006	-do-
	Mst. Samina Bibi D/O Dool Khan R/O Mastuj	-do-	L.Aidit:	1.4.2006	-do-
	Mir Ayub Khan S/O Mas Chab R/O Melp	GHS Melp	Chow:	1.4.2006	-do-
	Abdus Sami S/O Sher Ali, VO Melp	-do-	L.Aidit:	1.4.2006	-do-
	Hamidul Din S/O Saifud Din R/O Darch	GGHS Darch	Sweeper	1.4.2006	Against V. Post.
	Wazirullah S/O Jalal Khan, VO Lone	GGMS Lone	NQ	1.4.2006	Against newly created V. Post.
	Mohammad Afzal S/O Masht Wali R/O Lone	-do-	Sweeper	1.4.2006	-do-
	Jamilud Din S/O Syed Mohammad Zia, R/O Parabej	GMS Parabej	Sweeper	17.10.2005	-do-

- Their appointment is purely fixed salary basis and non pensionable.
- They should produce Health and age certificate from M/S DHQ Hospital Chitral.
- Their age should not exceed 45 years and below 16 years.

(SHEER DIL AMAN)  
Executive District Officer  
Schools and Literacy Chitral.

No. 2644-64 /M/APP/HC/IV Dated Chitral, the 3-5-2006.

- Copy of the above is forwarded for information and action to the:-
- District Accounts Officer Chitral.
  - Headmasters concerned.
  - Candidates concerned.
  - Middle Sections (M&L) local office.

Principal  
G.G.H.S.S Shingotak  
Chitral

Executive District Officer  
Schools and Literacy Chitral.

True Copy  
Muhammad Habib Noor Khan  
District & Sessions Court  
Chitral

ATTESTED

"BETTER COPY"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER S&L CHITRAL

OFFICE ORDER:

Consequent upon the recommendation of the departmental Selection Committee. Appointment of the following Class-IV is hereby ordered in fixed pay Rs.3500/- PM with effect from the date mentioned against each, in the interest of public service, subject to terms and conditions noted below.

S.No	Name/ Parentage & address	Office/school	Post	Effective from	Remarks
1.	Sikandar khan S/o Qurban R/o Seenlasht	GGMS Seenlasht	N/Q	01.04.2006	Against newly created post
2.	Mst. Najma Bibi D/o Hakim R/o Seenlasht	GGMS Seenlasht	Sweeper	01.04.2006	Do
3.	Hamid Ullah S/o Akbar Khan R/o Shiaqotek	GGHS Shiaqotek	Chow:	01.04.2006	Do
4.	Mst. Asia W/o Akbar Khan R/o Shiaqotek	Do	L.Attd	01.04.2006	do
5.	Ubaid Ullah S/o Zowali R/o Parabeg	GGHS Parabeg	Chow:	Do	Do
6.	Ibrahim Khan S/o Dinar Baig	Do	L.Attd	Do	Do
7.	Abdur Rahman S/o Yormas Qadir R/o S/Reech	GMS S/Reech	N/Q	DO	DO
8.	Abdur Rahim S/o Yormas Qadir R/o S/Reech	Do	Sweeper	Do	Do
9.	S.Hassan Wali Shah S/o Ghulam Habib R/o Istaru	GGHS Werkop	L.Attdt	Do	DO
10.	Habib Ur Rehman S/o Habib Ullah R/o Werkup	GGHS Werkup	Chow.	do	DO
11.	Mahboob Ali shah S/o Bool Khan R/o Mastuj	GGHS Mastuj	do	do	Do
12.	Mst. Samina Bibi D/o Bool Khan R/o Mastuj	Do	L.Attdt	Do	Do



13.	Mir Ayub Khan S/o Mas Gulab R/o Melp	GHS Melp	Chow.	Do	Do
14.	Abdus Sami S/o Sher Ali R/o Melp	Do.	L.Atttd	Do	Do
15.	Hamid Ud Din S/o Saif Ud Din R/o.....	GGHS Drosh	Sweeper	Do	Against V. post
16.	Wazir Ullah S/o Jalal Khan R/o Lone	GGMS Lone	N/Q	DO	Against newly created V.post
17.	Muhammad Afzal S/o .....R/o Lone	Do	Sweeper	Do	Do
18.	Jamal Ud Din S/o.....R/o.....	GMS.....	DO	17.10.2005	DO

1. Their appointment is purely fixed pay basis and non-pensionable.
2. They should produce health and age certificate from medical superintendent District Headquarter Hospital Chitral.
3. Their age should not exceed 45 years and below 16 years.

(Sher Dil Aman)  
Executive District Officer  
School and Literacy Chitral

No. 2644-64/ EB/App./C.iv Dated Chitral the 3.5.2006

Copy of the above is forwarded for information and action to the;

1. District Account Officer Chitral
2. Headmistress concerned
3. Candidate concerned
4. Middle Section (.....) local office.

Executive District Officer  
School and Literacy Chitral

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHITRAL.

OFFICE ORDER.

Appointment of the following Class-IVs (land donors) are hereby ordered in BPS No. 03 @ Rs. (8040-325-17790) plus usual allowances as admissible under the rule with effect from 01/03/2017.

S.No	Name & parentage	Address	Post	Name of School	Remarks
1	Saeedullah S/O Akbar Khan	Sheyagotak	N/Qasid	GGHS Sheyagotak	A.V. Post
2	Abdullah S/O Akbar Khan	-do-	Chowkidar	-do-	-do-
3	Ruhina Akbar D/O Akbar Khan	-do-	Lab/Attendant	-do-	-do-
4	Farzana Bibi W/O Late Mohd Azim Khan	Moghulandeh	Sweeper	GGMS Moghulandeh	-do-

TERMS & CONDITIONS:

1. Their appointment is purely temporary and liable to termination at any time.
  2. They should produce health and age certificate from Medical Superintendent District Head Quarter Hospital Chitral.
  3. They will be governed by such rules / regulations issued by the Government from time to time.
  4. Their service will be considered as regular but without pension and gratuity as per rule of selection, 19 of NWFP Civil Servants Act, 2005.
  5. They will contribute towards G.P.Fund on the prescribed rate.
  6. If appeal is filed against any candidate not accepted and the department will take no responsibility of it.
  7. They should not be handed over charge if their age exceeds 40 years & below 18 years.
- The appointees should submit affidavit regularly in duty. In case of irregularity they will be terminated from services.

True Copy

*Muhammad Sahib Noon Khan*  
 Advocate High Federal Shariat

*ASZ*  
*[Signature]*

[BIBI HASNATA]  
 District Education Officer  
 (Female) Chitral

ATTESTED

Better copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHITRAL

OFFICE ORDER:

Appointment of the following Class-IV (Land donors) are hereby ordered in BPS No.03@Rs.(8040-325-17790) plus usual allowances as admissible under the rule with effect from 01.03.2017.

S.No	Name and Parentage	Address	Post	Name of School	Remarks
1.	Saeed Ullah S/o Akbar Khan	Sheyaqotek	N/Q	GGHS Sheyaqotek	A.V post
2.	Abdullah S/o Akbar Khan	Do	Chowkidar	Do	Do
3.	Ruhina Akbar D/o Akbar Khan	Do	Lab. Attendant	Do	Do
4.	Farzana Bibi W/o Late Mohd Azim Khan	Moghulandeh	Sweeper	GGMS Moghulandeh	do

TERMS & CONDITIONS:

1. Their appointment is purely temporary and is liable to termination at any time.
2. They should produce health and age certificate from medical superintendent District Headquarter Hospital Chitral.
3. They will be governed by such rules/regulations issued by the Government from time to time.
4. Their services will be considered as regular but without pension and gratuity ..... Of section 19 of NWFP Civil Servant Act, 2005.
5. They will contribute towards G.P fund on prescribed rate.
6. If appeal is filed against any candidate and accepted, and the department will take no responsibility of it.
7. They should not be given charge if their age exceeds 40 years and below 18 years.
8. The appointees should submit affidavit for regularity in duty, in case of irregularity they will be terminated from service.

(Bibi.....

...)

District Education Officer

(Female Chitral)

ATTESTED

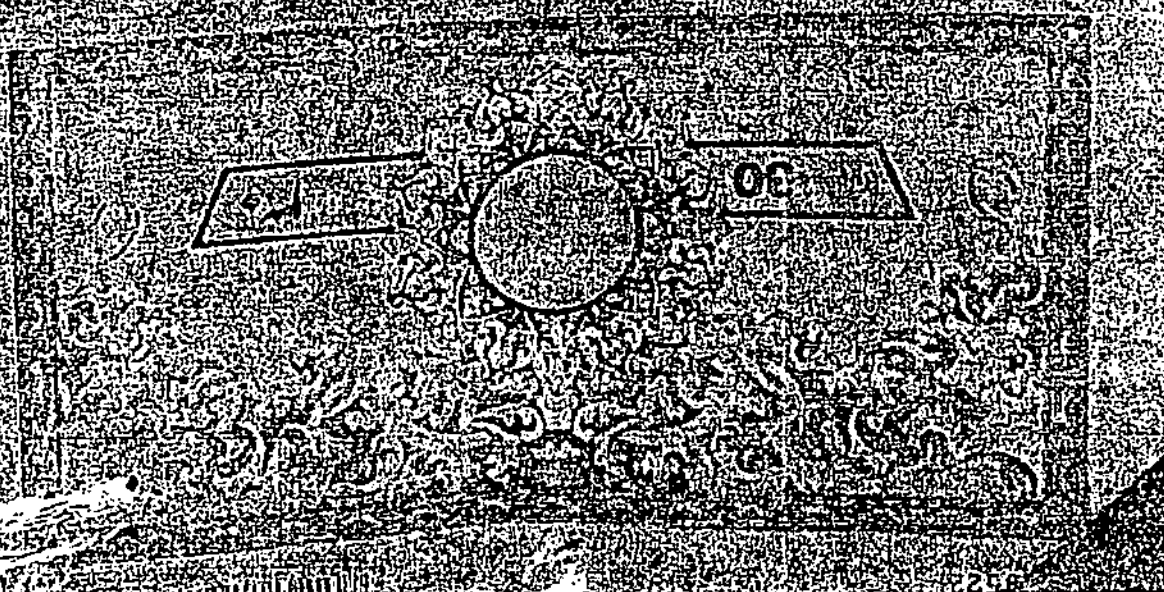
Muhammad Sahib Noor Khan  
Advocate High Court &  
Federal Shariat Court

*Muhammad Sahib Noor Khan*  
18/05/2014

This Copy

15201-057384-1

بسم اللہ الرحمن الرحیم  
میں نے اپنے والدین اور اولاد کو  
اپنی جائیداد سے حصہ دینے سے  
انکار کیا ہے۔



Annexure "D"

(13)

Better Copy

معاہدہ نامہ

فریق اول اکبر خان ولد زیر بلی ساکنہ شیاقو ٹیک ٹھیسری ضلعو حیدرآل ایک قطعہ زمین  
مقدار چار کنال گورنمنٹ ہائیر سیکنڈری سکول شیاقو ٹیک کی تعمیر کیلئے سکول  
سکشن ہونے کے بعد جتنے بھی کلاس فور پوسٹیں سکشن ہو جائیں  
ان تمام پوسٹوں پر زمین کے بدلے میں حکمہ ایجوکیشن بھرتی کرنے کا پابند ہوگا۔  
بغیر اس کے علاوہ بھی آئندہ کوئی کلاس فور پوسٹ اس سکول میں سکشن ہو جائے  
اس پر بھی مالک جائیداد کے نامزد کردہ بندے کو بھرتی کرنے کا پابند ہوگا۔ اس کے  
علاوہ نیشن پر جانے کی صورت میں مالک جائیداد کے بندے کو بھرتی ہونے لگے۔

یہ فریق دوم حکمہ ایجوکیشن مالک جائیداد کے درج بالا شرائط کو منظور  
کر کے اراضی لے لی، مالک جائیداد کے تحریری اجازت کے بغیر حکمہ تعلیم نے کسی  
اور فرد کو دے دی، تو مالک جائیداد کو یہ اختیار ہوگا کہ وہ (مالک زمین)  
کی مکمل قیمت بجمعہ پر جانے فریق دوم سے وصول کر لے گا۔ درج بالا شرائط  
کو دونوں فریقین منظور کر کے اپنے اپنے دستخط کئے۔

Assistant District Education  
Officer (P & D) Chitral

22.6.2012

گواہ 1

15201-0573841-1

گواہ 2 فاروق علی خاں

15201-0604868-9

گواہ 3 عمران الہی

15202-5463949-5

ATTESTED

ATTESTED

(Signature)

Mahamudul Haque  
Ad.  
Fazlur Rahman

(Signature)  
True Copy

G.H.S.S. Shegholak  
Principal  
Chitral  
(Signature)  
10/02/21

H.G. - (Signature) -

(Signature) -

جانب ماہیاری درج ذیل پر دستخط کرنا پڑیگا۔  
 طالبان کے بارے میں خبریں  
 پورے ہلال چاند کے دوران...  
 اپنے آپ کو نشانہ بنانے کے لیے  
 اپنی جان خطرے میں ڈال رہے ہیں۔  
 ان کے خلاف سخت کارروائی کرنے کی ہوجانی چاہیے۔  
 ان کے خلاف سخت کارروائی کرنے کی ہوجانی چاہیے۔  
 ان کے خلاف سخت کارروائی کرنے کی ہوجانی چاہیے۔

درخواست گزار کی تحریر شدہ پتہ مذکور (ان کی اہلیان) -

مقامت خٹک (جنرل ایئر سٹیٹ) -

"E"  
Annexure

پولیس فارم نمبر 24-15(1)

سرینل نوٹس۔۔۔ 002409

ابتدائی اطلاعی رپورٹ نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجموعہ ضابطہ فوجداری

نمبر: 345/23 قاعدہ: جزیل شی طبع: لوگر جزیل ای ٹیک نمبر: 00345	تاریخ وقت وقوع: رقت ماسلوم دوران جزیل کی چھٹیاں
1. تاریخ وقت رپورٹ	6. قاعدہ سے روانگی کی تاریخ وقت
2. نام و سکونت اطلاع دہندہ مستفیث	آصف سکول پتہ زلزلہ ہائیر سیکنڈری سکول شیاقو ٹیک جزیل، موجودہ پتہ زلزلہ ہائیر سیکنڈری سکول شیاقو ٹیک جزیل، پیشہ بہرہ پیل فون نمبر: 03452101203
3. مختصر کیفیت جرم (محدودہ) کہاں اگر کوئی کو کیا ہے	جرم:
	380 تہ پ 457 تہ پ
4. جائے وقوعہ و قائلہ قاعدہ سے اور سمت	زلزلہ ہائیر سیکنڈری سکول شیاقو ٹیک جزیل بقاصلہ قریب 3 کلومیٹر جانب جنوب از قاعدہ
5. کارروائی مشقت تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہو اور اس کی وجہ بیان کی جائے	تحریری مراسلہ موصول ہونے پر مقدمہ قائم ہوا۔

دستخط: Bulbul Hassan پلٹ نمبر: 731/M جہود: SI ملی فون نمبر: 334698894799

(ابتدائی اطلاع دہندے درج کریں)

جناب عالی اوقات مندرجہ صدر پر ایک تحریری مراسلہ جناب PASI اظفر عالم دست کنستبل عطاء الدین نمبر 329 قاعدہ مذکور موصول ہو کر جس کا متن اوہو ذیل ہے۔ بخدمت آئسپراپارچ صاحب قاعدہ جزیل شی جانب عالی آج مورخہ 07.08.2023 کو دوران موہاٹل گشت شیاقو ٹیک میں موجود کی کے دوران اطلاع ملی کہ گورنمنٹ زلزلہ ہائیر سیکنڈری سکول میں چوری کا وقوعہ ہوا ہے۔ تفتیش اور قانونی کارروائی کی خاطر جائے وقوعہ پہنچنے پر پہل گورنمنٹ ہائیر سیکنڈری سکول آصف سکول صاحب نے ایک تحریری درخواست پیش کی کہ وہ موجود ہیں۔ بخدمت جناب SHO صاحب قاعدہ جزیل جانب عالی کارروائی کے لیے کہ میں گورنمنٹ ہائیر سیکنڈری سکول زلزلہ کا پہل ہوں۔ آج دوران جزیل بیکنگ NGO کی طرف سے بتائی گئی کیونکہ سٹریٹ میں موجود کیپوٹریب دیکھنے سے پتہ چلا کہ یہاں کیپوٹریب 3 اور 1 کیپوٹریب تھے۔ کیپوٹریب کے علاوہ کینٹر وغیرہ بھی غائب تھے۔ لہذا آج میں تفتیش کرنے کے بعد ماسلوم چور اور چوروں کے خلاف میرے سکول کے کیپوٹریب میں گھس کے چوری کرنے کے پتہ وقوعہ اور اس کے رپورٹ کرتی ہوں۔ مریان ماسلوم کے خلاف چوری کا پتہ درج رجسٹر کر کے طمان کو کیفر کردار تک پہنچایا جائے۔ پہل آصف سکول زلزلہ ہائیر سیکنڈری سکول شیاقو ٹیک۔ جزیل موہاٹل اور 03452101203 SD 07.08.2023 آصف سکول پہل GGSS شیاقو ٹیک جزیل کارروائی پولیس: میں پیش کردہ درخواست سے صورت جرم بلا کا پتہ نامہ جرم ماسلوم جرم نامہ مذکورہ نمران ماسلوم پتہ شیاقو ٹیک مقدمہ دست کنستبل عطاء الدین ارسال کیا ہے۔ پتہ چاک کر کے تفتیش ID اسٹاف کو حوالہ کیا جائے۔ میں موقع پر مصروف تفتیش ہوں۔ مراسلہ گزارش ہے۔ SD PASI اظفر عالم جناب جزیل مورخہ 07.08.2023 کارروائی قاعدہ: میں آصف ماسلوم صرف درج صدر ہو کر پتہ جرم اطلاع طوم طمان ماسلوم فون چاک کیا گیا۔ مقدمہ کی اطلاع بذریعہ کنٹرول روم آئسپراپارچ عالی کارروائی جاری ہے۔ تفتیش انوشا گیشن ونگ کو حوالہ ہو کر پتہ گزارش ہے۔

SI Bulbul Hassan  
07-08-2023

True Copy

Handwritten signature and date: 10-08-2023  
Municipal Court, Muzaffargarh

ATTESTED

(16)

Annexure

"G"

خلع بارو جرائل

رپورٹ بصیغہ اخراج

قائد: جرائل علی

رپورٹ نمبر: 173

تاریخ: 2023-08-07

مقدمہ نمبر: 345/23

قائد: جرائل علی

جرم نمبر: 380

457

1	نام مستفیض یا اطلاع دہندہ	آصف سکول ولد زینت ہائیر سیکنڈری سکول شیاقویک جرائل
2	لوہیت جرم استناد	380 457
3	تفصیل مال سرودہ اگر کوئی ہو	
4	نام دہیہ لڑکان اگر کوئی ہو	
5	گرفتہ کیا گیا تو تاریخ گرفتاری	
6	تاریخ وقت رہائی	
7	تفصیل مال برآمد ہو یا نہ ہو	
8	مختصر حالات مقدمہ و نتیجہ تحقیق	

*Sir*  
*forwarded for analysis*  
*8/11/23*

جناب عالی احاطت مقدمہ ہذا میں ایک مورخہ 07.08.2023 PASI/ نظر علم دوران سہ ماہی گشت گورنمنٹ ہائیر سیکنڈری سکول شیاقویک میں چوری کا واقعہ رونما ہوا ہے جس کی تاملی کارروائی کی خاطر جائے وقوعہ پر مدعیہ مقدمہ والا ایک تحریری درخواست برائے تاملی کارروائی پیش کی ہے جو کہ اوپر مذکور ہے۔ بعد مت جناب SHO صاحب قائد جرائل صاحب نے تاملی کارروائی سے کہ میں گورنمنٹ ہائیر سیکنڈری سکول زینت کا پرنسپل ہوں۔ آج دوران جرائل چیکنگ NGO کی طرف سے پائی گئی کیونکہ سٹریٹ میں موجود کیمپ ٹریپ دیکھنے سے پتہ چلا کہ ٹریپ میں مورخہ 13 اگست کیمپ ٹریپ قائم تھی۔ کیمپ ٹریپ کے علاوہ سیکنڈ ہائیر میڈیٹ گھاس تھے۔ لہذا آج میں نقل کرنے کے بعد نامعلوم چور چوروں کے خلاف میرے سکول کے کیمپ ٹریپ میں ٹیس کے دوران کرنے کے باوجود وہ پکڑی گئے اور پورٹ کرتی ہوں۔ لڑکان نامعلوم کے خلاف چوری کا پتہ چور چور جسٹس کے لڑکان کو کیمپ ٹریپ سے پکڑا گیا ہے۔ یہ سب اس وقت تک پہنچایا جائے کہ اس وقت تک زینت ہائیر سیکنڈری سکول شیاقویک جرائل سہ ماہی نمبر 03452101203 مورخہ 07.08.2023 SD اس وقت سکول پر لیس GGHSS شیاقویک جرائل کارروائی پر لیس جس پیش کرو اور درخواست سے صحت جرم ہٹا کر ایسا کر اسلئے جرم 4 پر خلاف لڑکان نامعلوم پر عرض قاضی مقدمہ سراسر قائد اسلئے مقدمہ ہذا دوران جرائل چور چور کیمپ ٹریپ میں کیمپ اسٹاف کو اطلاع ہوا ہے۔ PASI اسلئے جانے وقوعہ سے پوریہ AHP حاصل خان مقامات چور چور کی اور میرے 5 عدد نشانات تخت افکار حوالہ کرنے پر قبضہ پولیس میں کر کے اسلئے نمبر 1 سرسیرہ AHP کے پاس لے کر گئے گواہان لڑکان سے تحقیق کی ہے۔ SI/OIL اور اس مقدمہ ہذا کی حسب ضابطہ تحقیق کرتے ہوئے گواہان لڑکان سراسر دستانہ پتہ چاک گندہ اور AHP کے پتات زینت ہائیر سیکنڈری سکول کے کیمپ ٹریپ سے حاصل کردہ شہرہ نشانی سراسر ہالا کارروائی کے مطابق کے لئے دفتر بارو جرائل ہے۔ سب گواہان لڑکان مقدمہ نقشہ سرخ پلا سٹیک تحریری مکتوب کیے گئے۔ ضابطہ سوانح پرنسپل اور نمین گیسٹ کاتالوج چور چور پالیسٹیک ملنے ہیں بطور وجہ ثبوت قبضہ پولیس میں کر کے اسلئے نمبر 2، 3 سرسیرہ AHP کے گواہان لڑکان سے تحقیق کی ہے۔ گواہان لڑکان کے پوری شدہ 1 ایک عدد خالی ڈیوڈ LED 2 ایک عدد خالی ڈیوڈ 3 ایک سیکڑے کے ایک عدد خالی ڈیوڈ 4 ایک عدد خالی ڈیوڈ کیمپ ٹریپ پولیس میں کر کے گواہان لڑکان سے تحقیق کی ہے۔ کالمنڈات چوری شدہ سالانہ حاصل کر کے لکھ سٹیٹس کی ہے گواہان لڑکان کے مطابق لڑکان کے بیانات زینت ہائیر سیکنڈری سکول میں مورخہ 16 اگست قبضہ کیے۔ سکول میں مورخہ 16 اگست اور دیگر علاقہ کے دیگر سٹیٹس گواہان لڑکان سے ضابطہ انڈیکسیشن میں لایا ہے۔ سکول کے اسٹاف اور مشاہیر کان کے CDR حاصل کر کے پتہ چلا کہ میں لکھ سٹیٹس کی ہے مورخہ 16 اگست دوران سراسر دستانہ پتہ چاک گندہ

*ATC*  
*AS*

Attested Copy Clerk Session Court

ATTESTED

17/08/2023



(17)

Annexure  
"H"

**IN THE COURT OF MUHAMMAD HAYAT**  
SENIOR CIVIL JUDGE (Admin)/JUDICIAL MAGISTRATE, CHITRAL LOWER

Case No. \_\_\_\_\_ Date of Institution \_\_\_\_\_

FIR No. 345 Dated: 07.08.2023 (u/s) 387/457 PPC PS Chitral City

State: \_\_\_\_\_ Victim: Unknown

Serial No.  
Date Of Order

Order or Other Proceedings with Signature of Judge or Magistrate and That of Parties or Counsel Where Necessary.

Order No. 10  
23.08.2023

DyPP for the present. Final report/Complete challan submitted by prosecution.

Perusal of record reveals that final reports/complete challan, received from the prosecution. Its perusal would reveal that as a result of the occurrence reported to local police by one Asfu Kanwal Principal Higher Secondary School Shiaqotek/complainant, the local police lodged above cited FIR against the unknown accused in respect of theft of computers from the lab of Higher Secondary School Shiaqotek, Chitral Lower. During investigation it was found by local police that the occurrence was took place during winter vacations and no lock or door was broken, therefore, it is assumed that if the occurrence was happened the keys were used for the same which were in custody of school officials. A departmental inquiry was also initiated and as per the report of Departmental Committee the mishap was due to negligence of school staff/watchman. As per Inquiry report the robbery was the outcome of sheer negligence of both the watchmen Mr. Hameedullah and Mr. Abdullah and they are responsible for this financial loss of the Community your Centre/Computer Lab. The committee recommended to recover all the amount of stolen items/devices from the above mentioned watchmen and to purchase the new ones for the lab. After the receipt of inquiry report, local police forwarded this final report/complete challan for cancellation of FIR.

Attested  
Copy Clerk  
Session Court/2C  
Chitral  
4.5.24

ATTESTED

Better copy

IN THE COURT OF MUHAMMAD HAYAT

SENIOR CIVIL JUDGE (Admin) JUDICIAL MAGISTRATE  
CHITRAL LOWER.

Case No.....Date of institution.....

Fir No. 345, Dated 07.08.2023, U/s 380, 457PPC, PS Chitral City


State Vs Unknown

Serial No. Date of order	Order or other proceedings with signature of judge or Magistrate and that of parties or Counsel where necessary.	
Order No..... 23.4.2024	Dy PP for the present. Final report/complete challan submitted by prosecution. Perusal of record reveals that final report/complete challan received from the prosecution. Its perusal would reveal that as a result of the occurrence reported to local police by one Asfa Kanwal Principal Higher Secondary School Shiaqotek/complainant, the local police lodged above cited FIR against the unknown accused in respect of theft of computers from the lab of Higher Secondary School Shiaqotek, Chitral Lower. During the Investigation it was found by local police that the occurrence was took place during winter vacations and no lock or door was broken, therefore it is assumed that if the occurrence was happened the keys were used for the same which were in custody of school officials. A departmental inquiry was also initiated and as per the report of Departmental Committee the mishap was due to the negligence of school staff/watchman. As per inquiry report the robbery was the outcome of the sheer negligence of both the watchman Mr. Hameed Ullah and Mr. Abdullah and they are responsible for this financial loss of the community youth centre/computer lab. The committee recommended to recover all the amount of stolen items /devices from the abovementioned watchmen and to purchase the new ones for the lab. After the receipt of the inquiry report local police forwarded this final report/complete challan for cancellation of FIR.	

18

**IN THE COURT OF MUHAMMAD HAYAT**  
**SENIOR CIVIL JUDGE (Admin)/JUDICIAL MAGISTRATE, CHITRAL LOWER**

Case No. \_\_\_\_\_ Date of Institution: \_\_\_\_\_  
FIR No. 345 Inre: 07.08.2023 u/Ss 386-457 PPC PS Chitral City  
State ... Is ... Unknown

Serial No. Date Of Order	Order or Other Proceedings with Signature of Judge or Magistrate and That of Parties or Counsel Where Necessary.	کیم نمبر / تاریخ
<u>Order</u> <u>Cancel</u>	<p>This Court is now of the considered view that if the case is fixed for further proceeding, it will bear no fruits. Thus, for the reasons, the Court sees no probability of progress in the present case FIR even if the case is further proceeded.</p> <p>Therefore, by agreeing with the Prosecution, the FIR is hereby cancelled. Case property, if any, be disposed of as per law and rules. This file be consigned to record room after necessary completion and compilation, police file be returned with copy of this order.</p> <p><u>Announced</u> 23.04.2024</p> <p style="text-align: center;"> (Muhammad Hayat) SCJ (Admin)/Judicial Magistrate, Lower Chitral</p> <p style="text-align: right;"><u>Attested</u> Copy Clerk Session Court/Zu Chitral 4.5.24</p>	

**ATTESTED**

Better copy

IN THE COURT OF MUHAMMAD HAYAT'

SENIOR CIVIL JUDGE (Admin) JUDICIAL MAGISTRATE  
CHITRAL LOWER.

Case No.....Date of institution.....

Fir No. 345, Dated 07.08.2023, U/s 380, 457PPC, PS Chitral City

State Vs Unknown

Serial No. Date of order	Order or other proceedings with signature of judge or Magistrate and that of parties or Counsel where necessary.	
Order No..... 23.4.2024	<p>This court is now of the considered view that if the case is fixed for further proceeding , it will bear no fruits. Thus for the reasons the court sees no probability of progress in the present case FIR even if the case is further proceeded.</p> <p>Therefore, by agreeing with the prosecution, the FIR is hereby cancelled. Case property if any be disposed of as per law and rules. This file be consigned to record room after necessary completion and compilation. , police file be returned with copy of this order.</p> <p>Announced 23.04.2024</p> <p style="text-align: right;">Muhammad Hayat SCJ (Admin) Judicial Magistrate, Lower Chitral</p>	

(19)

Annexure  
"I"



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR  
(P&D) Branch**

No. 328 P.No.02/DO (P&D) Chitral Dated Peshawar the 13/3/2024

To  
The District Education Officer (F),  
Chitral Lower

Subject: INQUIRY REPORT OF ROBBERY INCIDENT TAKEN PLACE AT GGHSS SHIAQOTAK DISTRICT CHITRAL LOWER

I am directed to refer to the subject noted above and to enclose the inquiry report submitted by inquiry committee for implementation of its recommendations in letter and spirit under intimation to this Directorate.

I am further directed to request you to ask the Principal of GGHSS Shiaqotak to recover the amount of the robbery from both the Class-IVs i.e Mr. Hamid Ullah and Mr. Abdullah through proper challan, please.

*[Signature]*  
Assistant Director (P&D)  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar

- Copy of the following forwarded to the:-
1. Principal GGHSS Shiaqotak District Lower Chitral.
  2. P&D Director, Directorate of (E&S) Khyber Pakhtunkhwa Peshawar.

*[Signature]*  
Assistant Director (P&D)  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar

True Copy

DEO (F) Chitral  
Clery No.  
Dated

*[Signature]*  
Muhammad Sahib Noor Khan  
Jl. Court &  
Shariat Court

ATTESTED

*Handwritten notes:*  
11/11/24  
25/03/24  
29

BETTER COPY

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR

No.328.....(P&D) Chitral

Dated Peshawar 13.03.2024

To.

The District Education Officer (F),  
Chitral Lower

INQUIRY REPORT OF ROBBERY INCIDENT TAKEN PLACE AT  
GGHSS SHIAQOTEK DISTRICT CHITRAL LOWER.

I am directed to refer to the subject noted above and to enclose the inquiry report submitted by the inquiry committee for implementation of its recommendations in letter in spirit under intimation to this Directorate.

I am further directed to request you to ask the Principal of GGHSS Shiaqotek to recover the amount of the robbery from both the Class-IV i.e Mr. Hamid Ullah and Mr. Abdullah through proper challan, please.

Assistant Director (P&D)  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar

.....No.....

Copy of the following forwarded to the;

1. Principal GGHSS Shiaqotek, District Lower Chitral
2. PA to Director of (E&SE) Khyber Pakhtunkhwa Peshawar

Assistant Director (P&D)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

28

Annexure

"J"



OFFICE OF THE PRINCIPAL GGHSS SHIAQOTAK CHITRAL LOWER. PHONE NUMBER. 0943-413458. EMAIL ADDRESS. [ggssshiaqotak@gmail.com](mailto:ggssshiaqotak@gmail.com).

No. 193-94 /GGHSS/INQUIRY/RECOVERY/WYCC dated 27/03/2024

- 1. Mr. Harnid Ullah Chowkidar GGHSS Shiaqotak, Chitral Lower.
- 2. Mr. Abdullah Chowkidar GGHSS Shiaqotak, Chitral Lower.

Subject: IMPLEMENTATION OF THE RECOMMENDATION OF INQUIRY REPORT/ RECOVERY OF RS. 3400000/- (THIRTY-FOUR LAC RUPEES ONLY).

Memo:

Reference to the No. 16375/E-14/ EB (F) dated Chitral the 26/03/2024 received from the District Education Officer (Female), Chitral Lower; you are hereby directed to deposit Rs. 3400000/- (Thirty-Four Lac Rupees) into the Govt Treasury through Challan within two Weeks of the receipt of this call and submit a copy it in the office of the undersigned failing which the matter will be reported to high ups.

*[Signature]*  
Principal,

GGHSS Shiaqotak Chitral Lower.

Endst: No. \_\_\_\_\_ dated \_\_\_\_\_ /2024.

Copy to the District Education Officer (Female) Chitral Lower with reference to her No & date as referred above for information: please.

*[Signature]*  
Principal,  
GGHSS Shiaqotak Chitral Lower.

True Copy

*[Signature]*  
10-03-2024  
Muhammad Sahib Noor Khan  
High Court &  
District Court

*[Signature]*  
**ATTESTED**

BETTER COPY

OFFICE OF THE PRINCIPAL GGHSS SHIAQOTEK CHITRAL LOWER.  
PHONE NUMBER 0943-413458. EMAIL ADDRESS .gghssshiaqotak  
@gmail.com

No. 193-94/GGHSS /INQUIRY/RECOVERY /WYCC dated 27/3/2024

1. Mr. Hamid Ullah Chowkidar GGHSS Shiaqotak  
Chitral Lower
2. Mr. Abdullah Chowkidar GGHSS Shiaqotak  
Chitral Lower

IMPLEMENTATION OF THE RECOMMENDATION OF  
INQUIRY REPORT /RECOVERY OF Rs.3400000/- (THIRTY -  
FOUR LAC RUPEES ONLY).

Memo:

Reference to the No. 16376/E-14/EB(F) dated Chitral the 26/03/2024 received from the District Education Officer (Female) Chitral Lower , you are hereby directed to deposit Rs.3400000/- (Thirty Four Lac Rupees) into the Govt. treasury through challan within two weeks of the receipt of the call and submit a copy of it in the office of the undersigned failing the matter will be reported to high ups.

Principal  
GGHSS Shiaqotak,  
Chitral Lower

Endst: No. ....dated...../...../2024

Copy to the District Education Officer (Female) Chitral Lower with reference to her No. and date as referred above for information, please.

Principal  
GGHSS Shiaqotak Chitral Lower



(21)

Annexure  
K

### Interdepartmental Appeal

True Copy  
Muhammad Sahib Memon  
Associate High Court &  
Federal Shariat Court

The Worthy Secretary Elementary  
& Secondary Education, KP  
Peshawar

Departmental Appeal for Cancellation of order No.328 F, No. 02/ DD (P&D) Chitral  
Dated 13-03-2024 Peshawar, Whereby on the basis of enquiry report the appellants  
(watchmen) has been ordered to deposit Rs. 3400000/- (Thirty Four Lacs) - the  
amount of robbery committed by unknown accused at GGSS Shiqotak Lower  
Chitral, and may also kindly pass a restraining order to suspend all the proceedings  
and actions initiated by the lower authority on the basis of said impugned order till  
the disposal of this appeal.

Respectfully Sir,

The appellants serve as watchman in the Government Girls High Secondary School in Shiqotak lower chitral, since decades. It is with utmost concern and disbelief that, I write to appeal against the unjust accusations and unfair order passed against me in the light of enquiry report by the worthy assistant Director (P&D) E&SE KP Peshawar on school 25-03-2024 regarding the robbery incident at the newly constructed community youth centre in the middle girl's portion of Shiqotak Chitral Lower.

Despite my unwavering cooperation with the police investigation and the search conducted at my residence no incriminating evidence found linking me to the robbery, however to my dismay, the department enquiry committee failed to interrogate crucial individuals such as the class fours staff of that middle girls school that portion where the robbery alleged to have been committed, the Principal and other teachers, clerical staff and even the student opting to solely target me based on my position as watchman. It is deeply troubling that without any material proof or thorough investigation, the enquiry committee hastily ordered me and my brother to deposit Rs. 3400,000/- as the supposed loss incurred due to this robbery. The decision not only tarnishes me and my brother reputation, but also imposes an unjust financial burden on us. Therefore, the said order and inquiry committee report being liable to be rejected for the following reasons.

1. The appellant had no duty in the middle school where the said robbery took place, but the duty of the appellants in the high and higher secondary school portion. Mr. Abdullah has on duty from 8am to 4pm and Hameed Ullah is on duty from 4pm to 8pm daily and the place where the theft took place is quite far apart from the place of duty of the appellants and it is a universal truth that no person can be present at two different places at the same time, and according to law duration of duty shall not be more than 8 hours. In this regard, the appellants also made a timely request to the higher officials, but instead, as a punishment the appellants were announced on duty from morning to evening in the DC Office Chitral Lower. Furthermore, no concrete evidence is available on record regarding the negligence of the appellants in performing of their duties.
2. That apart from all the teaching staff, clerical staff, hundreds of students and especially the class four staff of that portion where the theft happened by teachers

ATTESTED

BETTER COPY

To

The Worthy Secretary •  
Elementary And Secondary Education KP, Peshawar.

SUBJECT: DEPARTMENTAL APPEAL FOR CANCELLATION OF ORDER NO #02/DD(P&D) CHITRAL DATED 13/03/2024 PESHAWAR, WHEREBY ON THE BASIS ENQUIRY REPORT THE APPELLANTS (WATCHMEN) HAS BEEN ORDERD TO DEPOSITE RS:3400000/- (THIRTY FOUR LAC). THE AMOUNT OF ROBBERY COMMITTED BY UNKNOWN ACCUSED AT GGHSS SHIQOTAK LOWER CHITRAL, AND MAY ALSO KINDLY PASS A RESTRAINING ORDER TO SUSPEND ALL THE PROCEEDINGS AND ACTIONS INITIATED BY LOWER AUTHORITY ON THE BASIS OF SAID IMPUGNED ORDER TILL THE DISPOSAL OF THIS APPEAL.

Respectfully Sir,

The appellants serve as watchmen in Govt Girls High Secondary School in Shiaqotak Lower Chitral Since decades. It is with utmost concern and disbelief that I write to appeal against the unjust accusations and unfair order past against me in the light of inquiry report by the worthy Assistant Director (P&D) E&SE, KP Peshawar on school 25/03/2024 regarding the robbery incident at the newly constructed community youth center in the middle Girls portion of Shiaqotak Chitral Lower.

Despite the unwavering co-operation with the police investigation and the search conducted at my residence no incriminating evidence found linking me to the robbery. however to my dismay, the department enquiry committee failed to interrogate crucial individual such as the class fours staff of the middle girls school that portion where the robbery alleged to have been committed, the Principal and other teachers, clerical staff and even the student opting to solely target me based on my position as watchman.

It is deeply troubling that without any material proof or thorough investigation, the enquiry committee hastily ordered me and my brother to deposit Rs.3400000/- as the supposed loss incurred due to this robbery. The decision not only tarnishes me and my brother reputation, but also imposes an unjust financial burden on us. Therefore, he said order and inquiry committee report being liable to be rejected for the following reasons.

1. The appellant had no duty in the middle school where the said robbery took place. But the duty of the appellants in the high and higher secondary school portion. Mr, Abdullah has on duty from 8 am to 4 pm and Hameed Ullah is on duty from 4 pm to 8 am daily and the place where the theft took place is quite far apart from the place of duty of the appellants and it is a universal truth that no person can be present at two different places at the same time,

that the enquiry committee biased the investigation. The enquiry committee wrongly hold that the houses and shops of the appellants are adjacent to the place of occurrence but the houses and shop of the appellants are situated to the distance of 500 meter from the place of occurrence. It is also an admitted fact enquiry committee and the lower authority had given no show cause notices to the appellants.

As the FIR of the incident has also been registered against unknown persons, the police also investigated the appellants with all the staff of the institution for that purpose the police called the appellants daily early in the morning and, were released at late night. The police also did not find any evidence against the appellants and the criminal case is pending in the competent court of law, and it is also a fact that the appellants are poor people belonging to the middle class and spent their life with the lowest salary, while appellants six Kanal land worth crores of rupees, has taken by the government and constructed the aforementioned High Secondary School without paying a single rupee to the appellants. Therefore conviction of appellants based on assumptions and concerns based inquiry report is against the principles of natural justice.

I humbly request a fair and unbiased review of our case, considering all pertinent evidence and testimony from individuals directly involved or affected by the robbery incident.

We firmly believe in our innocence and seek your intervention to ratify this grave injustice.

Thank you for your attention to this matter we eagerly await your prompt and fair resolution.

Sincerely

Appellant Mr. Abdullah

S/O Akbar Khan R/O Shiaqotak

(Chowkidar) at GGHSS

Shiaqotak District Lower Chitral

Contact: 03469055972

Copy to:

- 1. Director E&SE Department, Peshawar
- 2. District Education Officer (Female) Chitral Lower
- 3. The Principal GGHSS Shiaqotak Chitral Lower

Dated:

April 16, 2024

Chitral Lower

**True Copy**

*Muhammad Sahib Nour Khan*  
10-05-2024  
Muhammad Sahib Nour Khan

Note: All the relevant documents are enclosed herewith as annexure A to J

**ATTESTED**

22/A

and according to the law duration of duty shall not be more than 8 hours. In this regard, the appellants also made a timely request to the higher official, but instead, as a punishment the appellants were appointed on duty from morning to evening in the DC Office Chitral Lower. Furthermore no iota of evidence is available on record regarding the negligence of the appellants in performing of their duties.

2. That apart from all the teaching staff, clerical staff, hundreds of students and especially class four staff of that portion where the theft happened, by targeting only the appellants without any concrete evidence and justification, is the clear proof that the enquiry committee biased the investigation. The enquiry committee wrongly hold that the houses and shops of appellants are adjacent to place of occurrence but the houses and shop of the appellants are situated to the distance of 500 meter from the place occurrence. It is also an admitted fact enquiry committee and the lower authority had given no show cause notices to appellants.
3. As the FIR of the incident has also been registered against unknown person, the police also investigated appellants with all the staff of institution for that purpose the police called the appellant daily early in the morning and were released at late night. The police also did not find any evidence against the appellants and the criminal cases pending in the competent court of law, and it also a fact that the appellants are poor people belonging to the middle class and spent their life with the lowest salary while appellant 6 kanals land worth crore of rupees has taken by govt and constructed afore mentioned high secondary school without paying a single rupee to appellants. Therefore conviction of appellant based on assumption and concerns based enquiry report is against the principles of natural justice.

I humbly request a fair and unbiased review of our case, considering all pertained evidence and testimony from individuals directly involved or affected by the robbery incident.

We firmly believe in our innocence and seek your intervention to rectify this grave injustice.

Thank you for your attention to this matter we eagerly await your prompt and fair resolution.

Sincerely

Appellant Mr Abdullah  
S/O Akbar Khan R/O Shiaqotak  
(Chowkidar) at GGHSS  
Shiaqotak District Lower Chitral  
Contact:03469055972

Copy to:

1. Director E&SE Department Peshawar
2. District Education Officer (female) Chitral Lower
3. The Principal GGHSS Shiaqotak Chitral Lower

Dated: April 16, 2024  
Chitral Lower.

Handwritten signature or initials at the top right.

Accepted and accepted

Handwritten text at the top left.

bc-12-3659

CNIC: 15202-4823353-7

2024

12

Handwritten text below the date.

Main body of handwritten text, appearing to be a letter or report.

Handwritten text on the left side, possibly a name or title.

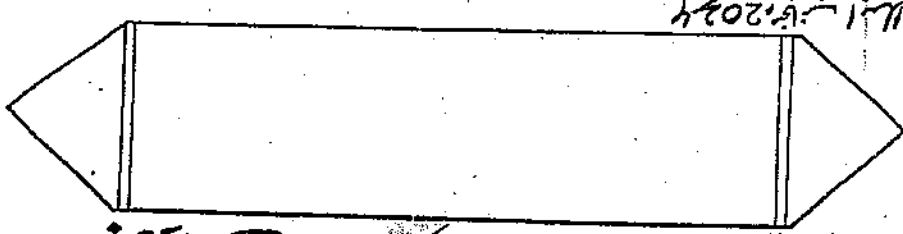
Handwritten text at the bottom of the main body.

Handwritten text below the main body.

Handwritten text in a box-like structure at the bottom left.

Handwritten text at the bottom right.

2024



Handwritten text below the large box.