

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 920/2024

Muhammad Arif Khan Vs Director Elementary & Secondary Education and Others.

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District Education Officer,  
(Male) Peshawar

*Jafar Ali*

*Arif Khan*

①

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 920/2024

Muhammad Arif Khan Vs Director Elementary & Secondary Education and Others.

**PARA WISE COMMENTS FOR AND ON BEHALF OF RESPONDENTS NO. 1 & 2.**

Respectfully Sheweth:-

The respondents submit as under:-

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16346

Dated 07.10.24

**PRELIMINARY OBJECTIONS.**

1. That the appellant has got no cause of action/locus standi.
2. That the Appellant has concealed material facts from this Hon'ble Tribunal.
3. That the appellant has been estopped by his own conduct to file the instant appeal before this Hon'ble Tribunal.
4. That the instant appeal is badly time barred.
5. That the instant appeal is not maintainable in its present form.
6. That the instant appeal is bad for mis-joinder and non-joinder of the necessary and proper parties.
7. That the appellant has not come with clean hands to this worthy Tribunal.
8. That the appellant does not come in the definition of Aggrieved Person.
9. That the instant appeal barred by law.
10. That the appellant under Section-10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 is bound to perform his duty any where in District Peshawar being District Cadre Post.

**ON FACTS.**

1. That Para No.1 is incorrect, misleading and against the facts. The appellant was serving as PSHT in GPS Yousaf Abad. His performance was not satisfactory. There was a conflux of complaints against the appellant for misusing the school funds for his own selfish motives without the prior permission of the PTC chairman and even sold the old furniture of the school, he also coming to the school with pistol to pressurize the school staff which was badly effecting the learning environment of the school. In wake of number of complaints filed against the appellant and his defiant behavior the respondent department transferred him to GPS Sher Kallay Peshawar and conducted Inquiry against him.

**(Copies of Complaints are attached as Annex-A)**

2. That in reply to Para No. 02, it is submitted that appellant was posted as PSHT in GPS Yousaf abad but latter on it was disclosed that his performance was not satisfactory and was badly effecting the learning environment of the school. Therefore the respondent department transferred him to GPS Sher Kallay Peshawar and conducted Inquiry against him.

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11/5/24

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3. That in reply to Para No.03. it is submitted that the appellant was transferred to GPS Sher Kallay in the best interest of public service on 20-03-2024 on administrative grounds but till the end of May 2024, the appellant did not resume the charge in GPS Sher Kallay, therefore, the respondent department posted Mr. Arif Ullah Shah as PSHT in GPS Sher Kallay for the smooth running of learning activities in the school.
4. That in reply to Para No.04 it is submitted that several complaints received from the parents of the students as well as from the public bodies against the appellant. The Respondent Department transferred the appellant in the best interest of public and conducted the Inquiry. The Inquiry Committee conducted inquiry against the appellant in the light of the complaints filed against him. The inquiry Committee called the appellant to explain his position regarding the complaints filed against him but the appellant did not appear before the inquiry Committee. The inquiry Committee found him guilty of the charges leveled against the appellant. For the better satisfaction of the appellant, the Respondent Department conducted 02 Inquires. Both the inquires given the Recommendation as below:

**“It is recommended under the Khyber Pakhtunkhwa E&D rules 2011 to impose major penalty of compulsory retirement on Mr. Arif PSHT GPS Yousaf Abad in the best interest of students.”**

**(Copies of Inquiry-I and Inquiry-II are attached as Annex- B & C)**

In light of the Recommendations of the Inquiry Committee, the Respondent Department has started Departmental proceedings against the appellant by issuing him notice for Personal Hearing.

**(Copy of notice for Personal Hearing is attached as Annex-D)**

5. That Para No.05 is incorrect, misleading and against the facts. The appellant is quit healthy because he has adopted a style which is not suited with a teacher.. He is not obeying the lawfull orders of the Competent Authority and is giving threats to the Competent Authorities for selfish motives.

**(Copies of threats notices is attached as attached as Annex-D)**

6. That Para No.06 is incorrect, misleading and against the facts. Posting and transfer is the part and parcel of the Civil Service and a Civil Servant has to perform his duty in the jurisdiction where his services are required.
7. That in reply to Para No.07, it is submitted that as the appellant was not resuming the charge of his post in GPS Sher Kallay therefore, the respondent department posted Mr. Arif Ullah Shah as PSHT in GPS Sher Kallay for the smooth running of learning activities in the school.

  
Arif Ullah Shah

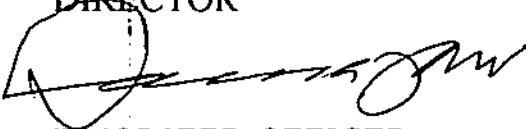
Grounds:

(3)

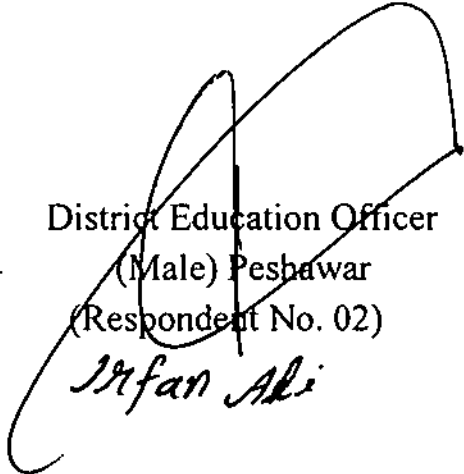
- A. That Ground-A is incorrect, misleading and against the facts. The detail reply has been given in the above Para of facts.
- B. That Ground- B is incorrect, misleading and against the fact. The Respondent Department has acted according to law, rules and policy in the best interest of pulic.
- C. That Ground-C is incorrect, misleading and against the fact. The post of PSHT is District Cadre and the appellatant has been transferred on admistrative grounds.
- D. That Ground-D is incorrect, misleading and against the fact. The detail reply has been given in the above Para of facts.
- E. That Ground-E is incorrect, misleading and against the fact. The detail reply has been given in the above Para of facts.
- F. That in reply to Ground-F it is submitted, that the appellatant was serving as PSHT in GPS Yousaf Abad. His performance was not satisfactory. There was a conflux of complaints against him. It was came to know that he was misusing the school funds without the prior permission of the PTC chairman and even sold the old furniture of the school. He was keeping pistol with him to pressurize the school staff and was badly effecting of the learning environment. In wake of the defiant behavior and number of complaints against him, the respondent department transferrèd him to GPS Sher Kallay Peshawar and conducted Inquiry against him.
- G. That the respondents also seek permission to advance the additional documents to this Hon'ble Tribunal at the time of arguments.


It is therefore; very humble prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.

SAMINA ALTAF  
DIRECTOR

  
AUTHORIZED OFFICER  
ABDUS SAMAD  
DEPUTYDIRECTOR  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondent No.01)

District Education Officer  
(Male) Peshawar  
(Respondent No. 02)

  
Mufan Ali

  
AS80504

Assesed  
+ 4

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- ① مہینہ

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5. مہینہ اسٹیٹس اور اسٹیٹس کے درمیان فرق

Date

Answer A (4)

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NC-17 Yousal Abad Peshawat Ph: 0346-666557

NASIR MISHWANI General Councilor

NASIR MUSHWANI Chairman NC-17 Yousal Abad Pesh. Ph: 0301-666557

NC-17 0301-666557

17301-1664990-3

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Ref No: \_\_\_\_\_ Date: \_\_\_\_\_

Revised  
7/24

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کتاب "سائنس اور سماج" کے بارے میں سائنس دانوں کی رائے

سائنس دانوں کی رائے کے مطابق سائنس اور سماج کے درمیان ایک گہرا تعلق ہے۔

سائنس دانوں کی رائے کے مطابق سائنس اور سماج کے درمیان ایک گہرا تعلق ہے۔

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سائنس دانوں کی رائے کے مطابق سائنس اور سماج کے درمیان ایک گہرا تعلق ہے۔

سائنس دانوں کی رائے کے مطابق سائنس اور سماج کے درمیان ایک گہرا تعلق ہے۔

سائنس دانوں کی رائے کے مطابق سائنس اور سماج کے درمیان ایک گہرا تعلق ہے۔

(7) 2

Respected Sir


SDEO Town One Peshawar City

It is request, That the Head Master of Govt Primary School Yousaf abad is badly affecting the educational activities of the children due several reasons. The poor acadamic performance of the children, most of the children dropping out the school. Publicly weapons in school has negative impact on the children personality. Usually bad attitude with teachers, Some time the School assembly held due to the late coming or some time absolutely absent full day. For this reason the department officers have also warned them on many times.

The designated officers of IMU have also Under reported several time. And reduction has been many times.

There fore, We have strongly request from the department to take an action .

Thanks.


  
**ATTAULLAH JAN**  
Labour Councillor  
NC-7 Yousaf Abad


  
**SOHAN KHAN**  
Youth Councillor  
NC-7 Yousaf Abad Pesh

  
**CHAIRMAN  
KHAN RAHIMAN**  
NC-7 Yousaf Abad

  
**CHAIRMAN**  
Zahid Gul Khattak  
NIC 17

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**AMANAT ALI**  
V. Chairman  
NC-17, Mahi Terai  
Peshawar City

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**OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICE (MALE) TOWN 1 PESHAWAR**

No. 5594

Dated 30/8/2024

To

The District Education Officer,  
(Male) Peshawar.

Subject: Non compliance/law and order situation/inquiries recommendations in respect of Muhammad Arif PSHT GPS Sher Killay Town II Peshawar

Memo:-

With due regard it is stated that Muhammad Arif was transferred from GPS Yousafabad to GPS Sher Killay Town II on administrative ground vide Endst: No.10384-87 dated 20-03-2024.

- Mr. Arif has still not taken charge to the assigned school since March 2024.
- Concerned official pressurized disgraced/threatened the previous DEO and SDEO (M) Town I Peshawar for cancellation of order.
- The said official exhibited weapons in his previous school i.e. GPS Yousafabad and illegally signed in register till date.
- The Nazim Khan Rehman Yousafabad community including more than fifty members register their written complaint against the official for his inefficiently and misconduct.
- The concerned teacher inquired two times report from Syed Amad Ullah Shah Principal GHS Zaryab Colony is submitted to Endst: No.701 dated 28-8-2024 from office of GHS Zaryab Colony and major penalty of compulsory retirement from services is mentioned.

It is therefore, proposed that kindly direct current PSHT Yousafabad to register FIR against the Ex: PSHT Muhammad Arif who is creating law and order situation in school and stopped him to make signature in the attendance register.


Report is submitted for further necessary action please.

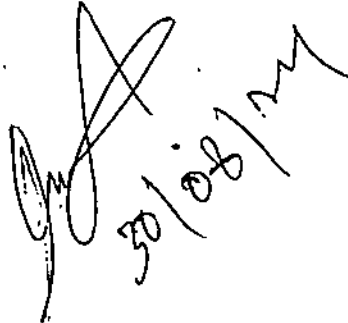
Sub Divisional Education Officer  
(Male) Town 1 Peshawar

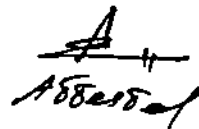
Endst: No. \_\_\_\_\_ dated \_\_\_\_/\_\_\_\_/2024

Copy to the:

1. ASDEO (Male) Circle City
2. PSHT GPS Yousafabad

  
Sub Divisional Education Officer  
(Male) Town 1 Peshawar

  
30/08/24

  
Muhammad Arif

**Inquiry Report of Mr. Muhammad Arif, PSHT, GPS Yousaf Abad Peshawar Regarding Showing Non- Compliance to his Transfer Order**

The Inquiry Officer received the inquiry letter on 14<sup>th</sup> May, 2024 under reference No.2306-09 Dated: 26/04/2024 from District Education Officer (M) E & SE District Peshawar, regarding Mr. Muhammad Arif, PSHT, GPS Yousaf Abad Peshawar for showing non-compliance to his transfer order. The documents are attached with the inquiry letter as Annexure B, C, D, E, F, G, H, I, J, K, L, M, N, O & P.

**Findings:**

- Mr. Muhammad Arif is transferred to GPS Sher Killi Peshawar. (Annexure F)
- Mr. Mehmood Fayyaz Saadi PSHT is Transferred to GPS Yousaf Abad Peshawar. (Annexure N)
- Mr. Mehmood Fayyaz Saadi is not given his charge at GPS Yousaf Abad Peshawar by Mr. Muhammad Arif for being considering the order incorrect and he does not obey this order issued DEO (M) Peshawar and Mr. Muhammad Arif inscribed the same words on the charge report of Mr. Mehmood Fayyaz Saadi. (Annexure M)
- ASDEO of Town I reported SDEO about the noncompliance of Mr. Muhammad Arif that he was sent the transfer order which he did not receive and tore it into pieces. (Annexure O)
- The SDEO reported DEO (M) Peshawar regarding Mr. Muhammad Arif that he is unable to run the institution. His administration is very much loose. He is a late comer and he does not report his absent staff members to the SDEO Town I. He is having funds issues. (Annexure E)
- His Teachers' Attendance shows that he cuts his days and does not conduct Morning Assembly of the school because he himself comes late and is reported by the EMA, School Leader and SDEO Town I. (Annexure D)
- Report of Noncompliance is submitted by SDEO Town I to DEO (M) Peshawar and consequently his another transfer is issued to GPS Sher Killi Peshawar which is not obeyed the the Head Teacher concerned. (Annexure F, G & P)
- A failed student by the name of Habibullan Bilal s/o Bilal Khan was given passed certificate. (Annexure C)
- A complaint is lodged by General Counsellor that the said Heat Teacher, Muhamamd Arif is not running the school properly and there are problems in his school academically and administratively. (Annexure J)
- Another complaint is lodged by Parents of students including local elected bodies that the performance of the school is low and not appreciatory. The Head Teacher comes late and there is an open display of

fire arms at school. He is physically and mentally unfit and they demanded their transfer from school. (Annexure I)

- Parents lodged another complaint against him that he is not performing his duty property and he is playing with the future of students. (Annexure H)
- Parents lodged another complaint that fire arms are at show at school which casts bad image on the minds of students. (Annexure K)
- Another complaint is lodged against Mr. Muhammad Arif that he is not performing his duties well. (Annexure L)
- A questionnaire is handed to him and given time of five days to ponder over it and fill it up cautiously, if he is having proper answers to all the raised questions and can justify his stance, then, the Inquiry Officer will put them forward to DEO (M) for consideration but he has neither submitted his answers nor paid attention to them as a result the Inquiry Officer has not received Questionnaire yet. The Inquiry Officer reminded him again and again but he turned deaf ear to our provision. (Annexure B)

#### Conclusions:

- Mr. Muhammad Arif has his own grievances that he is a diabetic patient and cannot travel and is unable to perform his duty in far flung areas.
- His transfer is a routine one case which is made by competent authority by the complaints of Parents, Public Figures and Local Bodies. It has to be accepted and compliance has to be shown, the way Mr. Muhammad Arif behaved is above understanding and is openly taking risks to tarnish his reputation and give an end to his services.
- He is having communication problems with his high ups. In his this transfer case during my inquiry, I have witnessed that he is very much angry with his ASDEO Town I, SDEO Town I and DEO (M) Peshawar.
- He is not obeying orders at any cost and he is much bold and fearless.

#### Recommendations:

It is recommended under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules 2011 as provided in Rule 4 (2) (b) (ii) to impose major penalty on Mr. Muhammad Arif of Compulsory Retirement.

Inquiry Officer

Mr. Ameer Muhammad, Principal

Govt. Shaheed Saad ur Rahman High

Gulshan Rahman Colony

**PRINCIPAL**  
Govt. Shaheed Saad-ur-Rahman  
High School Gulshan Rahman Colony  
Peshawar

*A. Arif*

① Annex B ⑪

OFFICE OF THE PRINCIPAL GOVT SHAAHEED HARIIS NAWAZ HIGH SCHOOL ZARYAB COLONY PESHAWAR

No 70

Date 28/8/24

To  
The District Education officer (M)  
Peshawar.

Subject: Inquiry Report of Mr. Muhammad Arif PSHT, GPS Yousaf Abad Peshawar Regarding Showing Non-Compliance To his Transfer Order.

Memo:

With reference to your office order bearing Endst no 543-45 date: 25-06-2024 the detailed inquiry report of Mr. Muhammad Arif PSHT GPS Yousaf Abad Peshawar regarding showing non-compliance to his transfer order is hereby submitted with 13 annexures for further n/action on your part.

Thanking you.

Member

*Zulfiqar Ali*  
**HEAD MASTER**  
G.H.S. Yousaf Abad  
Peshawar City.

*Syed Aman Ullah Shah*  
**PRINCIPAL**  
G.S.H.N High Sch.  
Zaryab Colony Pesh.  
Principal  
GHS Zaryab Colony  
Peshawar

*[Signature]*  
18/8/24

**Inquiry Report of Mr. Muhammad Arif PSHT, GPS Yousaf Abad Peshawar regarding showing Non-Compliance to his transfer order.**

In compliance to an office order by DEO (M) Peshawar bearing Endst No.543-45 dated.25-06-2024, the undersigned officers conducted an inquiry regarding showing non-compliance to his transfer under by Mr. Muhammad Arif PSHT GPS Yousaf Abad Peshawar and the report as follows.

**1. A Brief History of the Case**

- i. Mr. Muhammad Arif PSHT was transferred from GPS No.3. Mattani to GPS Yousaf Peshawar against vacant post vide office order EndstNO .21489-92 dated 30-11-2018 and he took charge at GPS yousafabad on the same date (Annexure-A).
- ii. During his service at GPSYousaf Abad his performance at GPS Yousaf Abad was not satisfactory.
- iii. Residents of the area (Yousafabad) were not satisfied with him and they made complaints against him to SDEO Town-1 to transfer him from GPS Yousaf abad (Annexure -B).
- iv. In the light of complaints on administration ground in the best interest of the public he was transferred from GPS Yousaf Abad to GPS Sher Killi Peshawar vide office order Endst - NO -10384 -87 date -20-03-2024 (Annexure-C) But he did not show compliance to his transfer order and did not take charge at GPS Sher Killi.
- v. Mr. Mehmood Fayaz Saadi PSHT was transferred to GPS Yousaf Abad from GPS Lahori Gate Peshawar against vacant post at GPS Yousaf Abad after the transfer of Mr-Muhammad Arif.(Annexure-D
- vi. Consequently, the Honorable DEO(M) Peshawar initiated an inquiry against Mr.Muhammad Arif PSHT,GPS Yousaf Abad on account of his non-compliance of transfer order issued by DEO(M) Peshawar office and appointed the undersigned officersto probe the facts and submit detailed report fixing responsibility on the accused along with documentary proof vide office order bearing Endst-No.543-45 date 25-06-2024.(Annexure-E)

Member  
*Tullu G. Ali*  
 HEAD MASTER

Chairman  
*Syed Aman ulah Shikh*  
 Principal  
 PSHT High School  
 Peshawar  
*Asif*

## 2. Inquiry Proceeding:

- i. After receiving the office order, we both officers tried to contact Mr. Muhammad Arif, PSHTGPS Yousaf Abad on phone. The call was received by his wife who told us that Mr. Muhammad Arif slipped in the washroom and badly hurt and admitted in the hospital but someone told us that he was seen by him moving in the locality.
- ii. After a few days the undersigned officers sent three notices at the hand of Mr. Shahid Khan Chowkidar of GPS Yousafabad at different dates to appear before the inquiry committee to defend his case but he turned deaf ear to these notices and not a single time he responded.
  - i. 1<sup>st</sup> notice was issued /sent on 08/07/2024 to appear before committee on 12-07-2024 (Annexure-F)
  - ii. 2<sup>nd</sup> notice was sent on 15/07/2024 to appear before committee on 18-07-2024 (Annexure-G).
  - iii. 3<sup>rd</sup> notice was issued to him on 24/07/2024 to appear before inquiry committee on 27-07-2024 (Annexure-H).
- iii. Then we discussed the matter with the following officers and other men to probe the facts.
  - i. Mr. Ihsan Ullah Shah SDEO (M) Peshawar Town-I
  - ii. Mr. Sana Ullah ASDEO(M) City circle.
  - iii. Mr. Mahmood Fayaz Saadi PSHT GPS Yousaf Abad.
  - iv. Mr. Khan Rehman EX-PTC chairman GPS Yousaf Abad.

Mr. Ihsan Ullah Shah SDEO (M) Peshawar Town-I told us that even Mr. Muhammad Arif threatened him to cancel transfer order and provided us written proof of threat. (Annexure-I)

He revealed that Mr. Muhammad Arif even misbehaved with Mr. Sajjad Akhtar Ex-DEO (M) Peshawar.

Mr. Sana Ullah ASDEO (M) provided us different complaints in written form by different people of the locality against Mr. Muhammad Arif PSHT GPS Yousaf Abad asking him for his transfer. (Annexure-J, K)

Mr. Mahmood Fayaz Saadi PSHT GPS Yousaf Abad was of the view that Mr. Muhammad Arif marred the academic and disciplinary side of the school. (Annexure-L).

Mr. Khan Rehman Ex-PTC Chairman GPS Yousaf Abad told us that Mr. Muhammad Arif misused the school fund. He never called him to attend PTC meeting. He put his bogus signs on register and even on cheques. He sold old furniture. There was no teaching-learning environment in the school. (Annexure-M)

Member  
Zulfiqar Ali

Chairman  
Coyed Aman ulah  
Shah

PRINCIPAL

Asst. Secy

**Findings:**

1. Mr. Muhammad Arif PSHT GPS Yousaf Abad Peshawar was transferred to GPS Yousaf Abad from GPS 3 Mattani against vacant post vide office order Endst No.21489-92 dated.30-11-2018.
2. Parents of the students and members of Local Government (U/C) were not satisfied with the performance of Mr. Muhammad Arif as the Head Teacher.
3. A complaint was lodged by G.Counsellar that he said Head teacher was not running school properly and there are problems in his school academically and administratively.
4. Another complaint was lodged by parents of the students including local elected bodies that the performance of the school is low and not appreciatory. The head teacher comes late and his display fire arms at school.He is physically and mentally unfit and they demanded his transfer as the future of students was in danger in his hands.
5. He even misused school funds,sold old furniture as told by Mr.Khan Rehman EX-PTC chairman GPS Yousaf Abad Peshawar.
6. On account of these complaints, he was transferred and posted at GPSSher Killi Peshawar against vacant Post in the interest of public service.
7. Mr. Mehmood Fayaz Saadi PSHT was transferred to GPS Yousaf Abad on the post vacated by Mr.Muhammad Arif.
8. Mr Muhammad Arif did not show any compliance to his transfer order by DEO(M) Peshawar date: 20-03-2024 till date.
9. He goes to GPS Yousaf Abad,signs in the teacher attendance register,stays there some time and then leaves the school. He made some writing in the register also Annexure-N.
10. He even threatened MrIhsan ullah shah SDEO(M) to cancel his transfer order.
11. He misbehaved with EX-DEO(M) Peshawar Mr.Sajjad Akhtar.
12. Three different notices were sent to him at different date to appear before the inquiry committee and defend his position but he gave no importance and did not respond.
13. He is not obeying order at any cost and he is much bold and fearless.
14. He threatens each and every person. He is a rogue more than a teacher.

Member  
Tulbiq J. Ali

Chairman  
Syed  
Ihsan ul  
Shah

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**Recommendations:**

It is recommended under the Khyber Pakhtunkhwa E&D rules 2011 to impose major penalty of compulsory retirement on Mr. Arif PSHT GPS Yousafabad in the best interest of students.

Member

*Tulki J. Ali*

**HEAD MASTER**

G.H.S. Yousaf Abad  
Peshawar City

Chairman  
*Syed Amanullah Shah*

*[Signature]*

**PRINCIPAL**  
G.S.H.N High School  
Zaryab Colony Pesh.

*[Handwritten signature]*



#24  
MRS. S. S. S.

09/07/2024

6/07/24

*[Signature]*

Received

PRINCIPAL  
Zayab High School  
Zayab Colony, Faisalabad

08/07/2024

*[Signature]*

09/07/24

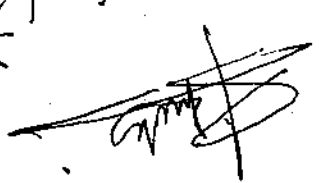
08/07/24

1. The receipt is for the amount of Rs. 500/- (Five Hundred Rupees) only.  
 2. The amount is received from Mr. S. S. S. on 08/07/2024.  
 3. The amount is for the purchase of stationery items.  
 4. The receipt is valid for the purpose of the school.  
 5. The receipt is issued by the Principal of Zayab High School.  
 6. The receipt is valid for the purpose of the school.  
 7. The receipt is issued by the Principal of Zayab High School.  
 8. The receipt is valid for the purpose of the school.  
 9. The receipt is issued by the Principal of Zayab High School.  
 10. The receipt is valid for the purpose of the school.

Signature of the Principal  
 Zayab High School  
 Zayab Colony, Faisalabad

MSB301  
#24

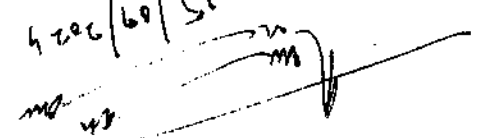
15/07/2024  
UVC



Received

PRINCIPAL  
G.S. N High School  
Zaiyab Colony Faisal

15/07/2024



انگریزی ٹیچرین

انگریزی ٹیچرین سے ملنے والی رقم 18-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
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انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو

انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
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انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو  
انگریزی ٹیچرین سے ملنے والی رقم 12-07-2024 کو

(7)

Annexure

Arshad

24/07/2024  
Arshad

PRINCIPAL  
LASHAN HIGH SCHOOL  
ZARAB COLONY, PESHAWAR

24/07/2024



مفتی ایجوکیشنل سوسائٹی

- مفتی ایجوکیشنل سوسائٹی نے درخواست کی ہے کہ مفتی ایجوکیشنل سوسائٹی کے ذریعے  
 مفتی ایجوکیشنل سوسائٹی کے نام پر ایک کلاس کھولی جائے تاکہ وہاں مفتی ایجوکیشنل سوسائٹی کے  
 طلبہ پڑھ سکیں۔ یہ کلاس مفتی ایجوکیشنل سوسائٹی کے نام پر کھولی جائے گی۔  
 مفتی ایجوکیشنل سوسائٹی کے نام پر ایک کلاس کھولی جائے تاکہ وہاں مفتی ایجوکیشنل سوسائٹی کے  
 طلبہ پڑھ سکیں۔ یہ کلاس مفتی ایجوکیشنل سوسائٹی کے نام پر کھولی جائے گی۔  
 مفتی ایجوکیشنل سوسائٹی کے نام پر ایک کلاس کھولی جائے تاکہ وہاں مفتی ایجوکیشنل سوسائٹی کے  
 طلبہ پڑھ سکیں۔ یہ کلاس مفتی ایجوکیشنل سوسائٹی کے نام پر کھولی جائے گی۔  
 مفتی ایجوکیشنل سوسائٹی کے نام پر ایک کلاس کھولی جائے تاکہ وہاں مفتی ایجوکیشنل سوسائٹی کے  
 طلبہ پڑھ سکیں۔ یہ کلاس مفتی ایجوکیشنل سوسائٹی کے نام پر کھولی جائے گی۔

Arshad  
مفتی ایجوکیشنل سوسائٹی

(18)

11

Handwritten text in Hindi, starting with 'आज का दिन' (Today's day).

Handwritten text in Hindi, continuing the narrative.

Handwritten text in Hindi, enclosed in a rectangular box.

Handwritten text in Hindi, starting with 'मैंने' (I).

Handwritten text in Hindi, starting with 'क्या' (What).

Handwritten text in Hindi, starting with 'जैसे' (Like).

Handwritten text in Hindi, starting with 'जो' (Which).

Handwritten text in Hindi, starting with 'जिस' (Which).

Attest  
[Signature]

انگریزی میں  
S 2  
میں

9-8-2024

[Signature]

9-8-2024

[Signature]

1۔ [Illegible handwritten text]  
 2۔ [Illegible handwritten text]  
 3۔ [Illegible handwritten text]  
 4۔ [Illegible handwritten text]  
 5۔ [Illegible handwritten text]  
 6۔ [Illegible handwritten text]  
 7۔ [Illegible handwritten text]  
 8۔ [Illegible handwritten text]  
 9۔ [Illegible handwritten text]

PSHT [Illegible handwritten text]

1530354

4

17301253226-1  
2350334004

12/8/2004

Handwritten notes in Urdu script, likely related to a financial or administrative document. The text is dense and appears to be a list or a detailed record of transactions or items.



کوئٹہ پبلک اسکول یوسف آباد کراچی  
رجسٹر حاضری مدرسین (123) بابت ماہ مارچ

مکتوبہ خدایانہ											
PSH											
تاریخ	آمد	دستخط	برائی	آمد	دستخط	برائی	آمد	دستخط	برائی	آمد	دستخط
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بیم	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال
انتہیہ										

124  
A88e98e



Handwritten notes at the top of the page, including the word "Passes" and some illegible scribbles.

Row	Col 1	Col 2	Col 3	Col 4	Col 5	Col 6	Col 7	Col 8	Col 9	Col 10	Col 11	Col 12	Col 13	Col 14	Col 15	Col 16	Col 17	Col 18	Col 19	Col 20
31																				
30																				
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Vertical handwritten notes in the center of the page, including "Duty" and "SSC" written multiple times.

SPST SPST SPST

Handwritten notes at the bottom of the page, including "2024" and "194" circled in a circle.

Handwritten signature or name at the top of the page.

روز	تاریخ	شرح	تاریخ	شرح	تاریخ	شرح	تاریخ	شرح	تاریخ	شرح
37	17/04	2024 SSC	17/04	2024 SSC	17/04	2024 SSC	17/04	2024 SSC	17/04	2024 SSC
36										
35										
34										
33										
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1										

Handwritten notes at the bottom of the page, including the date 2024 and other illegible text.

Handwritten number 55 in a circle.

26  
 گورنمنٹ پرائمری سکول پروفیسر آباد سوات  
 رجسٹر حاضرہ مدرستین بابت ماہ می (139)

ردیف	تسمات			مستان الحی			مقوم دفاعی سکول (PSHT)		
	آد	دستخط	رہائی	آد	دستخط	رہائی	آد	دستخط	رہائی
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م	مال	سابقہ	میزان	مال	سابقہ	میزان	مال	سابقہ	میزان

24  
 12/24



Handwritten signature or initials at the top of the page.

0315 = 9100115  
17301-7173408-5  
0313 = 9594332  
17301-3301059-7

0321 = 9090930

1701-8640423-7

0334 = 5937022  
17301-5164219-7

0345 = 9082005  
17301-1529780-1

0315 = 9595595  
17301-9601311-9

0311 = 9575701  
17301-175407-9

0317 = 1493920  
17301-1582468-1

0314 = 1847409  
17301-2633105-7

0332 = 9195668  
17301-63049105

NASIR MUSHWANI  
Chairman  
No. 17 Yousaf  
Abad Peshawar  
195557

DAY:

DATE:

Annex (2) (28)

236

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR Page | 1848

No. 1230

/Transfer/Adjsmnt Vol#2

Dated 12/09/2024

To,

The SDEO,  
(Male) Town-I Peshawar

Subject:

PERSONAL HEARING.

Memo:

*direct*  
You are hereby directed to Mr. Muhammad Arif PSHT, GPS Yousaf Abad Peshawar to attend the office of the undersigned for personal hearing on 14/09/2024 during office hours along with his original CNIC positively without fail.

(This is most urgent)

*01*  
Dy: District Education Officer  
(Male) Peshawar

*for  
Approval*

Handwritten text in Urdu script, appearing to be a list or notes. The text is written in a cursive style and includes several lines of text, some of which are partially obscured or faded. The text is oriented vertically on the page.

Handwritten signature or name at the bottom of the page, written in Urdu script.

Annex D

(29)

24  
1880

Handwritten text in Urdu script, appearing to be a list or account of items and their values. The text is written in a cursive style and is organized into several lines, with a horizontal line separating the lower portion of the document. The entries include various items and their corresponding amounts, such as "1000", "500", and "100".



~~14/6/2024~~  
14/6/2024

کار کا نام

424

میں نے اسے دیکھا ہے

میں نے اسے دیکھا ہے

میں نے اسے دیکھا ہے

میں نے اسے دیکھا ہے

میں نے اسے دیکھا ہے

میں نے اسے دیکھا ہے

610

میں نے اسے دیکھا ہے

20

(31)

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 920/2024

Muhammad Arif Khan Vs Director Elementary & Secondary Education and Others.

**Affidavit**

I, Irfan Ali DEO (Male) Peshawar do hereby solemnly affirm and declare on oath that the contents of the Para Wise Comments on behalf of respondents is correct to the best of my knowledge and nothing has been concealed from this Hon,ble court. it is further stated that in this appeal the answering respondents have neither been placed ex-parte nor their defense has been struck off/cost.

DEPONENT



District Education Officer  
(Male) Peshawar

Respondent No - 2

Identify by

**AUTHORITY LETTER**

Mr. Hujjat Ullah , ADEO (Litigation) office of the District Education Officer (Male) Peshawar is hereby authorized to submit Para Wise comments in Service Appeal No.920/2024 titled Muhammad Arif Khan Vs Govt. of Khyber Pakhtunkhwa and others on behalf of the Education Department (E &SE) KP Peshawar.

District Education Officer  
(Male) Peshawar

Respondent No-2  
Mr. Arif Ali