


# FORM OF ORDER SHEET

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

**Appeal No.** 1888 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/10/2024	<p>The appeal of presented today by Mr. Farhan Ullah Shahbanzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 14.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

S.A # 1888/2024

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

Nek Sabeel

Versus

Secretary E & SE Govt of KP, & others

**APPLICATION FOR FIXATION OF THE ABOVE  
TITLED APPEAL BEFORE THE PRINCIPLE SEAT OF  
PESHAWAR FOR HEARING.**

Respectfully Sheweth:

1. That the above titled appeal is filed before this Hon'ble Tribunal, wherein no date of hearing is fixed.
2. That the above titled appeal pertain to transfer and posting and required to be fixed urgently as bench at Bannu is not available, even counsel for the appellent as well as respondent No.1 & 2 are also belong to Peshawar, hence keeping in view the urgency of the matter the instant appeal be fixed for hearing before the principle seat at Peshawar.

It is, therefore, most humbly prayed that the instant application may kindly be allowed in the instant appeal be fixed at principle seat, Peshawar for hearing.

Dated: 10-10-2024

Appellant

Through

  
FARHAN ULLAH SHAHBANZAI

Advocate, High court

Peshawar

The appeal of Mr. Nek Sabeel received today i.e on 08.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 3 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Page no.20 of the appeal is illegible.


No. 887 /Inst./2024/KPST,

Dt. 9/10 /2024.

  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Farmanullah Shahbanzai Adv.  
High Court at Peshawar.

- i- Needful has been done and objection regarding Respondent No.3 has been removed and name of Respondent No-3 has been removed/deleted.
- ii- objection regarding Page No.20 has been removed and Better copy has been provided.  
Re-submitted for further Proceeding.

  
Farhanullah Shahbanzai  
10/10/2024

**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**AT PESHAWAR.**

Service Appeal No. 1888 / of 2024.

Nek Sabeel .....Appellant

**VERSUS**

Secretary E & SE Govt of KP, & others  
.....Respondents.

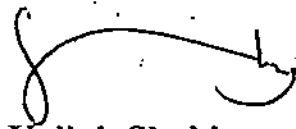
**I N D E X**

Sr. No.	Description of Documents	Annexure	Page No.
1)	Memo of Appeal Along with Affidavit and Addresses of the Parties		1-78
2)	Copy of election petition documents	A	8-14
3)	Copy of impugned transfer & posting order dated: 24-09-2024	B	15
4)	Copy of Department appeal	C	16-17
5)	Copy of regretting department appeal by respondent No.1 vide order dated: 04-10-2024	D	18-20
6)	Waqalat Nama		21

N. 812  
APPELLANT

Dated; 07/10/2024.

Through:-

  
(Farhan Uallah Shahbanzai)  
Advocate High Court,  
PESHAWAR

Office: FF.30, 5<sup>TH</sup> Floor, Bilour Plaza, Peshawar Cantt, Peshawar.  
Mobile No. 0321-9171522  
Email: farhanullah190@gmail.com

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**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL AT PESHAWAR.**

Service Appeal No. 1888 / of 2024

Nek Sabeel CT (BS-15), Govt High School Mamoki Dardariz, Bannu.

.....Appellant.

**V E R S U S**

1. Secretary of Govt of Khyber Pakhtunkhwa Elementary & Secondary Education (E & SE) Department, at Civil Secretariat Peshawar .
2. Director E & SE Department, at Civil Secretariat Peshawar.
3. District Education Officer (Male), Bannu.

.....Respondents.

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APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL ACT,  
1974, FOR CANCELLATION OF THE  
IMPUGNED TRANSFER/POSTING OFFICE  
NOTIFICATION, DATED 24-09-2024 WHEREBY  
THE APPELLANT WAS TRANSFER & POSTED  
AS CT AT GOVT MEDAL SCHOOL SADA  
KHEL, DOMEL, BANNU AND  
DEPARTMENTAL APPEAL OF THE  
APPELLANT AGAINST THE SAID ORDER  
WAS ALSO REGRETTE VIDE ORDER  
DATED: 04-10-2024 BY RESPONDENT NO.1.

**Respectfully Sheweth:-**

1. That appellant is the employee of Elementary and Secondary Education (E & SE) Department and serving as CT (BS-15), at Government High School Mamoki Dardariz, Bannu.
2. That the appellant was performing his duty as CT (BS-15), at Government High School Mamoki Dardariz, Bannu, with all his zeal and zest and there is no adverse remarks against the appellant when the appellant remain posted in the said School.

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3. That as the appellant performed his duty as Assistant presiding officer of Polling station No.29 at GHSS Al-Hameed Wali Noor Jani Khel (Male) along with Irfan Ullah (Presiding officer) during the 8<sup>TH</sup> February General Election for PK-101 Bannu-III, and Ex-Transport Minister of KP, was contesting election from the said constituency, as the Ex-MPA, failed to get more votes from Polling station No.29, and thereafter the appellant was firstly received threats and was directed to furnish an affidavit admitting about rigging, for which the appellant denied, and thereafter political victimization was started against the appellant by one way or the other.  
(Copy of election petition documents are annexed as "A").
4. That in continuation of political motivated treatment against the appellant, the respondent No.2 has issued the impugned transfer & posting order dated: 24-09-2024 of the appellant.  
(Copy of transfer/posting order dated: 24-09-2024 of the appellant is annexed as "B").
5. That being aggrieved from the said order the appellant filed his departmental appeal before the competent forum but the same was also regretted by respondent No.1 vide order date: 04-10-2024.  
(Copy of department appeal & order dated: 04-10-2024 are annexed as "C & D").
6. That there is no other remedy available to the appellant as such the appellant now approaches this Honorable Tribunal for cancellation and set-aside the impugned order of the respondents through the instant service appeal on the following grounds inter-alias.

### G R O U N D S :

- A. That the impugned orders of the Respondents are against law, facts and spirit of the rules laid down for the purpose of the posting and transfers of the civil servants, hence not maintainable.
- B. That the appellant has served honestly, efficiently and there is no adverse remarks against the appellant during his posting as CT teacher at Government High School Mamoki Dardariz, Bannu, as such appellant has never affiliated with any political party or person, as such posting the appellant at such far area amount to injustice with the appellant, hence the impugned transfer order is not sustainable.
- C. That the appellant has no concern with any candidate to win or lose, rather appellant has performed only his duty as assistant presiding officer of Polling station No.29 of GHSS Al-Hameed Wali Noor Jani Khel (male) of PK-101 (Bannu-III), as such it was not in the domain of the appellant to favor any candidate, but not extending the said favor to the Ex-MPA, the said Ex-MPA started victimization of the appellant, firstly the appellant was threaten to compel him to submit an affidavit, failing to which he would be transfer, and not supporting the said stance of the Ex-MPA, the appellant was transfer from Bannu to Hangu, which amount to injustice with the appellant and appellant has been penalized for performing his duty honestly in General Election, hence the politically motivated transfer & posting of the appellant is liable to be set-aside/cancelled.

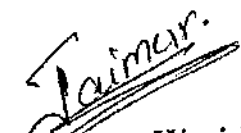
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- D. That the impugned posting/transfer orders are stereo-type in nature and it did not disclose any cogent, valid and logical reason for the posting/transfer of the appellant.
- E. That the impugned orders does not fall in the general orders rather have been issued for specific purpose/Political victimization, hence these orders are against the public interest.
- F. That the impugned orders in very short span of time after General Election, is prima facie suggest that the same are the result of political influence and based on malafide intentions, hence these orders are not sustainable in the eye of law.
- G. That the appellant has been condemned unheard and the golden principle of natural justice has been violated while issuing the impugned orders and on this count alone the impugned orders are liable to be canceled/set-aside.
- H. That even transfer & posting of the appellant at such far area is creating great hardships to the appellant, even till date no other person has been appointed on the said post, as such the impugned order required consideration of this Hon'ble Tribunal.
- I. That on permission of this Honorable Court the appellant may urged the other grounds if any, at the time of arguments.

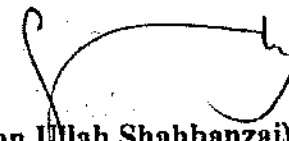
It is, therefore, most humbly prayed that on, acceptance of this appeal, the office Notification dated: 24-09-2024 and regretting of departmental appeal against the said order by respondent No.1 vide order dated: 04-10-2024 May kindly be set-aside and the respondents may further please be directed not to transfer the appellant from the post of CT at GHS Mamohi Dardariz, Bannu, along with any other relief deem appropriate in the matter be passed in favor of the appellant.

APPELLANT.

Dated; 08/10/2024

  
(Taimur Khan Wazir)  
Advocate High Court,  
PESHAWAR

Through:-

  
(Farhan Ullah Shahbanzai)  
Advocate High Court,  
PESHAWAR

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**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL AT PESHAWAR.**

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

Nek Sabcel

Appellant.

**VERSUS**

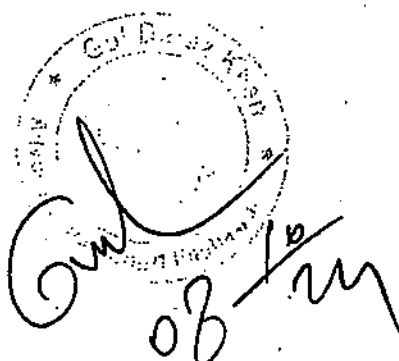
Secretary of E & SE & Others

Respondents.

**AFFIDAVIT**

I, Nek Sabcel CT (BS-15), Govt High School Mamoki Dardariz, Bannu (Appellant) do hereby solemnly affirm and states on oath that the contents of accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' able Court.

Dated: 08/10/2024



  
Deponent.



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**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL AT PESHAWAR.**

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

Nek Sabeel  
.....Appellant.

**VERSUS**

Secretary of E & SE & Others  
.....Respondents.

**ADDRESSES OF THE PARTIES**

Nek Sabeel CT (BS-15), Govt High School Mamoki Dardariz, Bannu.  
.....Appellant.

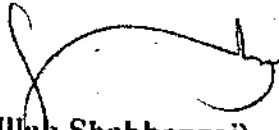
**VERSUS**

1. Secretary of Govt of Khyber Pakhtunkhwa Elementary & Secondary Education (E & SE) Department, at Civil Secretariat Peshawar .
  2. Director E & SE Department, at Civil Secretariat Peshawar.
  3. District Education Officer (male), Bannu.
- .....Respondents.

  
APPELLANT.

Dated: 2/10/2024.

Through:-

  
(Farhan Ullah Shahbanzai)  
Advocate High Court,  
PESHAWAR

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**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL AT PESHAWAR.**

C.M No. \_\_\_\_\_/2024

IN

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

**Nek Sabeel.....VS..... Secretary E & SE & Others**

**Application For suspension of Operation of the  
Impugned transfer/posting order dated:20-09-  
2024 of the appellant till the final disposal of the  
above mentioned appeal.**

**That the petitioner/appellant respectfully submits as under.**


1. That the petitioner is filing the above-mentioned Service appeal before this Hon able Tribunal, where date of hearing is not fixed.
2. That the appellant filed the above titled appeal against the impugned order date: 24-09-2024, whereby the appellant has been transfer from GHS Mamoki Dardariz, Bannu as CT Teacher and posted at GMS Sada Khel, Domel, Bannu.
3. That all the three ingredients of prima facie good case, irreparable loss and balance of connivance lies in favor of the appellant.
4. That the impugned transfer & posting order of the appellant is based on political victimization and in utter disregard of law & rules and if the operation of the impugned order of the appellant dated: 24-09-2024 has not been suspended the instant appeal will lost its effect.

It is therefore humbly prayed that on acceptance of this application the operation of the impugned transfer & posting order dated: 24-09-2024 of the appellant may kindly be suspended till the final disposal of instant service appeal.

Dated: 08-10-2024

  
APPELLANT/PETITIONER

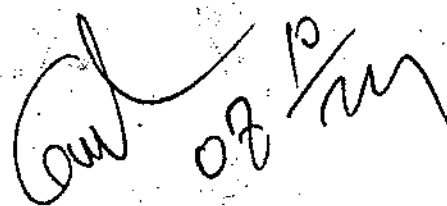
Through:-

  
(Farhan Ullah Shahbanzai)  
Advocate High Court,  
PESHAWAR

**AFFIDAVIT**

I, Nek Sabeel (Appellant), do hereby solemnly affirm and states on oath that the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' able Court.

  
Deponent.

  
08/10/24

ATTESTED



07/09/2028  
07/09/2018  
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11101-0830733-3



1888  
11101-0830733-3  
11101-0830733-3



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Annex A

**BEFORE THE HONORABLE ELECTION TRIBUNAL,**  
**PESHAWAR HIGH COURT, BANNU BENCH**

Election Petition No. \_\_\_\_\_/2024.

Shah Muhammad Khan Son of Amanullah Khan,  
Resident of Narmi Khel Baka Khel Wazir,  
Tehsil Baka Khel & District Bannu.  
Contesting Candidate (Independent),  
For election to the Khyber Pakhtunkhwa Provincial Assembly  
Constituency: PK-101 Bannu-III)

..... (Petitioner)

VERSUS

1. Syed Abrar Ali Shah, Returning Officer, PK 101 Bannu-III. Assistant Commissioner Bannu (Bannu Cantt).
2. Election Commission of Pakistan, through Secretary Election Commission Constitution Avenue G-5/2 Islamabad.
3. Provincial Election Commission Khyber Pakhtunkhwa Shami Road, Peshawar Cantt.
4. District Returning Officer District Bannu. Deputy Commissioner Bannu (Bannu Cantt)
5. District Election Commissioner District Bannu Baghe Sakoon near Kohat Road Bannu
6. Adnan Khan S/o Muhamamd Ali Khan R/o Mali Khel Jani Khel Mushteraka, Tehsil Baka khel District Bannu. Contesting Candidate, For PK 101 Bannu-III, JUI P, Mali Khel Jani Khel Mushtareka District Bannu.

ATTESTED

  
Shah Muhammad Khan  
Candidate for PK-101 Bannu-III

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the other with the returned candidate and work in close cohorts with him.

20. That in order to meet requirements of the Act and Rules, the Polling Staff that committed illegal and corrupt practices and contravened various provisions of the Act and the Rules, inter alia, are listed as follows:

a. That Mr. Muhammad Ismail Khan, SST General GHS Mamoki Dardariz being the presiding officer of Polling Station 11 - Government Girls Middle School Abbas Ali Sardikhel (Combined) along with the Assistant Presiding Officer namely Arshid Ali, CT Bannu and the polling officers namely Musarat SST GGHS Abbas Khan Sarki Khel, NASRAD BEGUM PST GGPS RAMTAL SARDI KHEL, NEKMAT ULLAH KHAN (BPS-15) GHSS DILASA KHAN MANDEW, AFROZ WAZIR PST GGPS FERAZ FATEH KHEL & ZARIF ULLAH PST in connivance with and the consent of Respondent No 6 had committed corrupt and illegal practice at the said Polling Station by allowing the fake ballot papers to be stuffed in the ballot boxes on the polling day and had counted the same illegally in favor of Respondent No 6 knowingly that it was illegal to count the said ballot papers during the counting that took place at the close of polls. Moreover the said presiding officer had made false and fabricated entries in Form 45 showing the result of count in favour of Respondent NO 6 with the connivance and consent of the latter.

✓ b. That Mr. Irfan Ullah, Lecturer AKDC Bannu being the presiding officer of Polling Station 29 - Government High Secondary School Al Hameed Wali Noor Jani Khel (Male) PS-I along with the Assistant Presiding Officer namely Nek Sabil Khan SST GHS Mamoki Dardariz and the polling officers namely ABDUL WAHAB CT (BPS-15), EID RAHMAN PST (BPS-12), SHAMIN KHAN SENIOR PST (BPS-14), SHER ALI BAZ KHAN SENIOR PST (BPS-14), SHERIN JAN SENIOR PST (BPS-14), MUHAMMAD JALAL KHAN PST (BPS-12), NOOR REHMAN SENIOR PST (BPS-14), SAFIR ULLAH KHAN SENIOR CLERK in connivance with and the consent of Respondent No 6 had committed corrupt and illegal practice at the said Polling Station by allowing the fake ballot papers to be stuffed in the ballot boxes on the

TESTED

Shah Muhammad Khan,  
Candidate PK-101, Bannu  
Petitioner

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polling day and had counted the same illegally in favor of Respondent No 6 knowingly that it was illegal to count the said ballot papers during the counting that took place at the close of polls. Moreover the said presiding officer had made false and fabricated entries in Form 45 showing the result of count in favor of Respondent NO 6 with the connivance and consent of the latter.

- c. That Miss. Sidra Mukaram SCT Bannu being the presiding officer of Polling Station 30 - Government High Secondary School Al Hameed Wali Noor Jani Khel (Female) PS-II along with the Assistant Presiding Officer namely Shamim AKhtar HS PST Nurar and the polling officers namely SHAHNAZ AKHTAR PSHT GGPS DOGAR UMER ZAI, SHAKILA BIBI CT GGHSS MUMBATHI BARAKZAI, SHAKILA PARVEEN PSHT GGPS SHAH ALAM DAUD. SHAH, SHAMIM AKHTER PSHT GGPS UMER NAWAZ MAGEE NURAR, SHANDANA BEGUM SENIOR QARIA GGHSS KAKKI, AMNA BIBI PST GGPS GULA KHAN, AMNA RAZ. PST GGPS NURAR ZARIN ABADI, ANUM SABAH PST GGPS HALDI MANDI in connivance with and the consent of Respondent No 6 had committed corrupt and illegal practice at the said Polling Station by allowing the fake ballot papers to be stuffed in the ballot boxes on the polling day and had counted the same illegally in favor of Respondent No 6 knowingly that it was illegal to count the said ballot papers during the counting that took place at the close of polls. Moreover the said presiding officer had made false and fabricated entries in Form 45 showing the result of count in favour of Respondent NO 6 with the connivance and consent of the latter.

- d. That Mr. Muhammad Zafran Khan, SS GHSS Nurar being the presiding officer of Polling Station 31 - Government Girls Primary School Gul Azeem Wali Noor Jani Khel (Combined)-I along with the Assistant Presiding Officer namely Hakeem Zaman AT GHS NO 2 Bannu and the polling officers namely Abdul Wadood SPST, Fazeelat SDM GGHS Ismaili Mama Khel, Inam Ullah Shah AT, Shakir Ullah SPST, Shamroz Raza SPST GGPS Akhiya Jan Baka Khel, Aamer Khan Qari, Aamer Khan PST, Asma PST GGPS Khadri Muhammad Khel Younas in

ATTESTED

  
Shah Muhammad Khan,  
Candidate PK-101, Bannu  
Petitioner

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connivance with and the consent of Respondent No 6 had committed corrupt and illegal practice at the said Polling Station by allowing the fake ballot papers to be stuffed in the ballot boxes on the polling day and had counted the same illegally in favor of Respondent No 6 knowingly that it was illegal to count the said ballot papers during the counting that took place at the close of polls. Moreover the said presiding officer had made false and fabricated entries in Form 45 showing the result of count in favour of Respondent NO 6 with the connivance and consent of the latter.

e. That Mr. Muhammad Shamroz Khan, SS Statistics GHSS Al-Hameed Wali Noor Jani Khel being the presiding officer of Polling Station 32 - Government High School Sher Alam Wali Noor Jani Khel (Combined) along with the Assistant Presiding Officer namely Faiz Ullah Khan PSHT GPS Shaista Baka Khel and the polling officers namely Farid ur Rehman PSHT GPS Bannu City NO 4, Farman Ullah Khan CT GMS Raibat Khan Bharat, Farooq Shah PSHT GPS Koli Khel, Shakila Shahbaz SPST GGPS Subedar Ayaz Khan, Yasmin Akhtar SPST GGPS Amandi Hanif, Luqman Ali Shah Junior Clerk, Shamshad Begum PST GGPS Muhammad Anwar Khan Landi Jhalandar, Siraj ud Din Senior TT GHS Jani Khel in connivance with and the consent of Respondent No 6 had committed corrupt and illegal practice at the said Polling Station by allowing the fake ballot papers to be stuffed in the ballot boxes on the polling day and had counted the same illegally in favor of Respondent No 6 knowingly that it was illegal to count the said ballot papers during the counting that took place at the close of polls. Moreover the said presiding officer had made false and fabricated entries in Form 45 showing the result of count in favour of Respondent NO 6 with the connivance and consent of the latter.

f. That Mr. Kifayat Ullah Khan, Senior PET, GHS No 2, Bannu being the presiding officer of Polling Station 33 - Government Middle School Khawadak Khwajdar Jani Khel (Combined) along with the Assistant Presiding Officer namely Jamal Ilahi CT GHS No 1 Bannu and the polling officers namely Jameela Yaqoob SPST GGPS Akbar Khan (Bachaki), Rasheeda Akhtar PSHT GGPS Bangi Khan Khujari, Saeed

ATTESTED

Shah Muhammad Khalil,  
Candidate PK-101, Bannu  
Petitioner

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Ullah Khan PST, Zainab SCT GGHS Rashid Warika Jani Khel in connivance with and the consent of Respondent No 6 had committed corrupt and illegal practice at the said Polling Station by allowing the fake ballot papers to be stuffed in the ballot boxes on the polling day and had counted the same illegally in favor of Respondent No 6 knowingly that it was illegal to count the said ballot papers during the counting that took place at the close of polls. Moreover the said presiding officer had made false and fabricated entries in Form 45 showing the result of count in favor of Respondent NO 6 with the connivance and consent of the latter.

g. That Mr. Irfan Ali Shah, VP GHS No 2 Bannu being the presiding officer of Polling Station 34 - Government Middle School Memhood Wali Noor Jani Khel (Male) PS-I along with the Assistant Presiding Officer namely Sher Ghazi Khan SCT GHS No 2 Bannu City and the polling officers namely ABDUL QADUS SHAH SENIOR PST (BPS-14) ABDULLAH KHAN SENIOR PST (BPS-14) ABDUR RAHIM KHAN SENIOR PST (BPS-14), MUHAMMAD SABIR KHAN SST (MATHS-PHYSICS) (BPS-16) GHS SATTI KILLA, Naveed Ullah Khan CT GMS Noor Ali Khujari Bannu, ABDUL HAQ QARI (BPS-12), MUHAMMAD SHOAIB PST (BPS-12), SAJID ALI SHAH PST (BPS-12) in connivance with and the consent of Respondent No 6 had committed corrupt and illegal practice at the said Polling Station by allowing the fake ballot papers to be stuffed in the ballot boxes on the polling day and had counted the same illegally in favor of Respondent No 6 knowingly that it was illegal to count the said ballot papers during the counting that took place at the close of polls. Moreover the said presiding officer had made false and fabricated entries in Form 45 showing the result of count in favor of Respondent NO 6 with the connivance and consent of the latter.

h. That Miss. Hameeda Noor CT GGMS NO-1 Bannu City being the presiding officer of Polling Station 35 - Government Middle School Memhood Wali Noor Jani Khel (Female) PS-II along with the Assistant Presiding Officer namely Bushra SAT GGMS No 1 Bannu City and the polling officers namely Farah Naz CT GGMS Faqir Abdullah Noor Alam, Farukh Taj PSHT GGPS Sahib Khan Tughul Khel, Farhad Gul PSHT

  
Irfan Muhammad Khan  
Candidate PK-101, Bannu III  
Petitioner



ATTESTED

Shah Muhammad Khan  
Candidate P.F. 101, Bannu III  
Petitioner



ARALI SHAH  
Magistrate Bannu  
Bannu III

Magistrate

08/02/24 v. 08/02/24

ESTD

The polling station was having the facility for election papers

Sl. No.	Name of Candidate	Roll No.	Signature	Stamp	Remarks
1	M. Ali Shah	850	[Signature]	[Stamp]	
2					
3					
4					
5					
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8					
9		174			
10					
11					
12					
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14		23			
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16					

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10/02/24

08/02/24 v. 08/02/24

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14

198 + 1996

45-18  
(81(1) 1985)

الجمهورية العربية السورية  
G.H.S.S

PK-101-BANNU-III

رقم	اسم	رقم	رقم	رقم	رقم
1					
2				81	
3				80	
4				00	
5				02	
6				00	
7				01	
8				38	
9				00	
10				304	
11				00	
12				07	
13				00	
14				00	
15				11	
16				00	
				364	
(A)					
(B)					
(C)					
(D)					
54					
(E)					
(F)					
(G)					
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209

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Shah... Khan  
Candidate...

Petitioner

Handwritten signature



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Annex "B"

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**



**NOTIFICATION**

Consequent upon the relaxation of ban on intra-district transfer accorded by Worthy Minister Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa and subsequent approval of the Competent Authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar), Transfer/Posting of the following officers/officials are hereby ordered, with immediate effect in the interest of public.

S#	NAME & DESIGNATION	FROM	TO (POSTED AS)	REMARKS
1.	Mr. Taj Alam ASDEO (MC) BPS-16	ASDEO (M) Circle Meryan	ADEO (Estab:Secondary) at O/O DEO (M) Bannu	Vice S.No. 4
2.	Mr. Kiramat Ullah Khan ASDEO (MC)(BPS-16)	ASDEO (M) Circle Mamash Khel	ADEO (P&D) at O/O DEO (M) Bannu	Vice S.No. 3
3.	Mr. Ashraf Khan ADEO (MC) BPS-16	ADEO (P&D) at O/O DEO (M) Bannu	ASDEO (M) Circle Meryan	Vice S.No. 1
4.	Mr. Seemab Ali ADEO (MC) BPS-16	ADEO (Estab:Secondary) at O/O DEO (M) Bannu	ASDEO (M) Circle Mamash Khel	Vice S.No. 2
5.	Mr. Nek Sabeel CT (BPS-15)	GHS Mamoki Dardariz Bannu	GMS Sada Khel Domel Bannu	AVP
6.	Mr. Sher Ghazi Khan SCT BPS-16	GHS No.2 Bannu City	GHS Sarwar Jan Baka Khel Bannu	AVP

**Note:**

1. Charge Report should be submitted to all concerned.
2. No TA/DA is allowed.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 3909-14 F.No. 1/ADEOs (M)/Transfer/District Bannu Dated the Peshawar: 24/09/2024

Copy forwarded to the:-

1. Section Officer (Schools/Male) E&SE Department w/r to his letter No. SO (SM)/E&SE/2-16/Posting/Transfer/2024 Dated 20-09-2024.
2. District Education Officer (M) Bannu.
3. District Accounts Officer Bannu.
4. Officers/Officer Concerned.
5. Mr. Salman Khan, Focal Person iEMIS.
6. PA to Director Local Office.

7

**ATTESTED**

  
24-09-2024  
**Assistant Director (Estab-M-I)**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

16

Amex "C"

To,

The Worthy Secretary  
E&SED, KP, PESHAWAR

Subject:-

DEPARTMENTAL APPEAL REGARDING GRIEVANCES  
OF REDRESSAL IN A SHAPE OF RETENTION OF  
TRANSFER ORDER DUE TO POLITICAL INTERFERENCE

R/Sir,

It is stated that the undersigned humbly submits as under

1. That the undersigned is working as Vice-Principal at GHS NO.2 Bannu City with great zest and zeal subject to the entire satisfaction of high-ups.
2. That in the year 2024 the undersigned was performed his duty as Presiding Officer at GMS MEHMOOD WALI NOOR JANI KHEL in General election conducted by the Election Commission of Pakistan in HALQA PK-101 Bannu.
3. That from above mentioned Halqa one Mr. Shah Muhammad Khan Wazir was lose MPA seat and defeated with heavy margin. In this regard he has submitted writ Petition before Peshawar High Court Bannu Bench against the winning candidate.
4. Moreover, it is astonishing to say that the said Shah Muhammad Wazir using different tactics, inveigle and try to force all those presiding officer for recording of statement in his favor where his numbers of votes are less in counting ratio.
5. That a month before the said candidate approached to my house with some rogues for favorable statement and gives 02 option as crimped one in favor statement and retention in same place and the second option un-wish transfer. For this

Put up  
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SO (SM)

1/10

ATTESTED

17

purpose I have sold proof as evidence and live human being as eyes witness of the occurrence.

6. That the undersigned never disobeyed any official directions in official capacity but the demand of the said candidate was illegal against the actual meaning of election rules, so, with grave heart his both option was rejected by me and accepted the right path and actual position as was placed in election time.

7. That as result the undersigned transferred through order No. 3909-14 F.No1/adlos(m)/Transfer/District Bannu DATED Peshawar 24<sup>th</sup> September, 2024, from GHS Mamoki dardariz to GHS Sarwar Jan Baka Khel without any inquiry, explanation or show cause notice which contrary to logic and against the rules and policy of the department because the said order issued on political basis. (Transfer order copy attached as annexure "A" )

8. That, the act of the said candidate based on malafide, ulterior motives and is in violation of fundamental rights as well as Election Act and clear cut political interference in official duty.

So, it is therefore, humbly requested to retain the undersigned at GHS Mamoki dardariz Bannu on the same post for the sake justice, please.

  
NEK SABEL C.T

GHS MAMOKI DARDARIZ BANNU

Copy for information and n/a to,

1. Chief Election, Commissioner of Pakistan, Islamabad
2. Chief Election Commissioner, KPK, Peshawar
3. PSO to Honorable Secretary, E&SED, KP, Peshawar.
4. Registrar Peshawar High Court Bannu Bench

  
ATTESTED



18

Annex 'D'

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223533 Email: [eschoolmale@gmail.com](mailto:eschoolmale@gmail.com)

No.SO(SM) E&SED/7-18/Departmental Appeals/2024  
Peshawar, Dated: 04.10.2024

To

1. Mr. Irfan Ali Shah, Principal (BS-18),  
GHS Nagri, Totial Abbottabad.
2. Muhammad Khalid Khan, Head Master (BS-17),  
GHS Ganderi Waziran, District Hangu.
3. Muhammad Shamroz Khan, SS Statistics (BS-17),  
posted as Head Master, GHS Nayan Banda, District Hangu.
4. Mr. Nek Sabeel, CT (BS-15),  
GMS Sada Khel Domel, District Bannu.

Subject: - DEPARTMENTAL APPEAL

I am directed to refer to the subject noted above and to state that your appeals has been thoroughly examined and hereby regretted being devoid of merit.

04/10/2024  
SECTION OFFICER (SCHOOLS/MALE)

Endst: of even No. & date.

Copy of the above is forwarded to:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. DEO (M), concerned.
3. PS to Secretary E&SE Department.
4. PA to AS (Estt), E&SE Department.
5. PA to DS (Estab), E&SE Department.
6. Master file.

SECTION OFFICER (SCHOOLS/MALE)

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ATTEST

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**OFFICE OF THE HEAD MASTER G.H.S MAMOKI  
DARDARIZ BANNU**



No. 343

3251  
30-09-24

Dated 27/09/2024

To

The District Education Officer (M) Bannu

Subject: Request for cancellation of transfer order in respect of Mr. Nek Sabil Khan CT through proper channel.

It stated with great sorrow that I came to know through social media that Mr. Nek Sabil Khan CT has been transferred from GHS Mamoki Dardariz Bannu to GMS Sada khel Dardariz Bannu Endr No 3909-14F I ADIOs(M) district Bannu dated 24/09/2024.

There are five vacant posts of teachers which are SST(BIO-CHEM), SST(G), TWO CT And one DM. The school has high enrollment and moreover Mr. Nek Sabil Khan CT is M Phil chemistry, thus he teaches Bio and Chemistry to 9<sup>th</sup> and 10<sup>th</sup> classes as we have no other teacher to teach the science subjects to 9<sup>th</sup> and 10<sup>th</sup> classes, the session is smoothly running.

It further added that I have not issued any NOC, nor he has submitted any application of transfer I therefore requested to you to take up the matter with high ups in the best interest of the public and the transfer may be considered as cancelled.

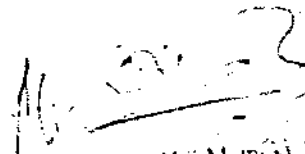
For the smooth running of the academic session 2024-2025 I retain Mr. Nek Sabil Khan CT for the best interest of the public and to take the matter with the high ups immediately.


Copy forwarded to

Section officer (schools/male) I:&SE Department Peshawar

DNIO (H/MA) Bannu.

District account officer Bannu.

  
Head Master G.H.S Mamoki  
Dardariz Bannu  
G.H.S Mamoki Dardariz  
Bannu





Better Copy of Page-20

**OFFICE OF THE HEAD MASTER G.H.S MAMMOKI**  
**DARDARIZ BANNU**

No. 343

Dated: 27-09-2024

To

**The Dirtrict Education Officer (M), Bannu**

**Subject: Request for cancellation of transfer order in respect of Mr. Nek Sabil Khan CT Through proper Channel**

It is stated with great sorrow that I came to know through social media that Mr. Nek Sabil Khan CT has been transferred from GHS Mamoki Dardariz Bannu to GMS Sada khel Domel Bannu Endst No 3909-14F/1A DEOs(M) District Bannu Dated 24/9/2014.

There are five vacant post of teachers which are SST(BIO-CHEM) SST(G) TWO CT and one DM. The school has high enrollment and moreover Mr. Nek Sabil Khan CT is M.Phil chemistry, thus he teaches Bio and Chemistry to 9th and 10th classes as we have no other teachers to teach the science subject to 9th and 10th classes, the session is smoothly running.

It further added that I have not issued any NOC, nor he has submitted any application of transfer, I therefore requested to you to take up the matter with high ups in the best interest of the public and the transfer may be considered as cancelled.

For the smooth running of the academic session 2024-2025 I retain Mr. Nek Sabil Khan CT for the best interest of the public and to take the matter with high ups immediately.

Copy forwarded to

Section officer (School/male) E & SE Department Peshawar

DMO (MA) Bannu.

District account officer Bannu

Sd

Head Master G.H.S Mamoki  
Dardariz Bannu



