


# FORM OF ORDER SHEET

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

**Appeal No.** 1889 /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  REGISTRAR</p>

S.A # 1889 / 2024

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

Muhammad Shamroz Khan

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 appellant 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. Muhammad Shamroz Khan 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. 19 of the appeal is illegible.

No. 886 /Inst./2024/KPST,

Dt. 09/10 /2024.

  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.


Farmanullah Shahbanzai Adv.

High Court at Peshawar.

i- Needful has been done and objection regarding Responded No. 3 has been removed and name of Responded No. 3 has been removed/deleted

ii- Objection regarding Page No. 19 has been removed and Better copy has been provided.

Re-submitted for further proceeding

  
Farhan Ullah Shahbanzai  
10/10/2024

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

Service Appeal No. 1889 / of 2024

Muhammad Shamroz Khan .....Appellant

**VERSUS**

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

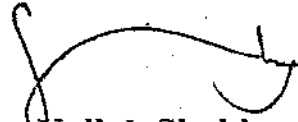
**I N D E X**

Sr. No.	Description of Documents	Annexure	Page No.
1)	Memo of Appeal Along with Affidavit and Addresses of the Parties		1- 7
2)	Copy of election petition documents	A	8-14
3)	Copy of impugned transfer & posting order dated: 20-09-2024	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	18-19-A
6)	Waqalat Nama		20

APPELLANT.

Dated: 28/10/2024.

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

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

Service Appeal No. 1889 / of 2024

Muhammad Shiamroz Khan SS Statistics (BS-17), Govt Higher Secondary School, Mamash Khel, 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 ORDER NO.SO(S/M)/E&SED/5-18/2024/: DATED 20-09-2024 WHEREBY THE APPELLANT WAS TRANSFER & POSTED AS HEAD MASTER AT GOVT HIGH SCHOOL NAYAN BANDA, HANGU AND DEPARTMENTAL APPEAL OF THE APPELLANT AGAINST THE SAID ORDER WAS ALSO REGRETTEED 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 Subject Specialist (BS-17), at Government Higher Secondary School Mamash Khel, Bannu.
2. That the appellant was performing his duty as Subject Specialist at Government Higher Secondary School, Mamash Khel 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.

3. That as the appellant performed his duty as presiding officer of Polling station No.32 at GHS Sher Alam Wali Noor Jani Khel (Combined) 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.32, 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: 20-09-2024 of the appellant.  
(Copy of transfer/posting order dated: 20-09-2024 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.

### GR OUNDS:

- 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 SS Statistics at GHSS Mamash Khel, 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 presiding officer of Polling station No.32 of GHS Sher Alam Wali Noor Jani Khel (combined) 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.

- 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 appellatant.
- 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 appellatant 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 appellatant at such far area is creating great hardships to the appellatant, even till date no other person has been appointed on the said post, as such the impugned order required consideration of this Hona'ble Tribunal.
- I. That keeping in-view the principal of equity and fair treatment, in alternative appellatant was required to be posted in some other school of the same District or otherwise the appellatant could be posted to the nearest district of District Bannu, but all of sudden the appellatant was posted at Hangu, which amount to highest degree of difficulties to the appellatant as well as his entire family, hence the impugned orders are liable to be reconsidered.
- J. That on permission of this Honorable Court the appellatant 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 order No.50(S/M)/E&SED/5-18/2024/., Dated 20/09/2024 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 appellatant from the post of SS Statistics at GHSS Mamash Khel, Bannu, or in alternative nearest place of posting in same District (Bannu) or in those District which is nearest to District Bannu, along with any other relief deem appropriate in the matter be passed in favor of the appellatant.**

**APPELLANT.**

Dated: 08/10/2024

Through:-

*Taimur*  
(Taimur Khan Wazir)  
Advocate High Court,  
PESHAWAR

*Farhan Ullah Shahbanzai*  
(Farhan Ullah Shahbanzai)  
Advocate High Court,  
PESHAWAR

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

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

Muhammad Shamroz Khan

.....Appellant.

**VERSUS**

Secretary of E & SE & Others

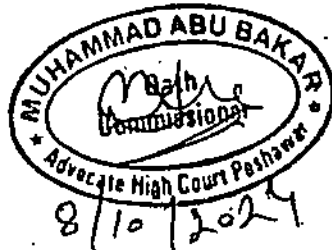
.....Respondents.

**AFFIDAVIT**

I, Muhammad Shamroz Khan SS Statistics (BS-17), Govt Higher Secondary School, Mamash Khel, 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.

Deponent.

Dated; 08 /10/2024





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

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

Muhammad Shamroz Khan

.....Appellant.

VERSUS

Secretary of E & SE & Others

.....Respondents.

**ADDRESSES OF THE PARTIES**

Muhammad Shamroz Khan SS Statistics (BS-17), Govt Higher Secondary  
School, Mamash Khel, 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; \_\_\_/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

Muhammad Shamroz Khan.....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.**

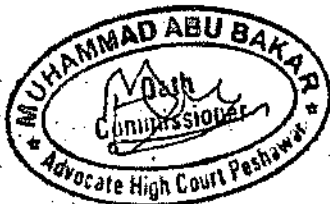
1. That the petitioner is filing the above-mentioned Service appeal before this Hon able Tribunal, where date of hearing is not fixed.
2. That the appellant filed the above titled appeal against the impugned order date: 20-09-2024, whereby the appellant has been transfer from GHSS Mamash Khel, Bannu as SS Statistics and posted at GHS Naya Banda, Hangu.
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: 20-09-2024 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: 20-09-2024 of the appellant may kindly be suspended till the final disposal of instant service appeal.

Dated: 27-10-2024

APPELLANT/PETITIONER

Through:-



(Farhan Ullah Shahbanzai)  
Advocate High Court,  
PESHAWAR

8/10/2024  
**AFFIDAVIT.**

I, Muhammad Shamroz Khan (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.

ATTESTED

محمد شاد کھان

155-23-502155  
100127316  
17301-143755-9

محمد شاد کھان  
محمد شاد کھان  
محمد شاد کھان  
محمد شاد کھان

	<p><b>PAKISTAN</b> National Identity Card</p> <p>Name: <b>Muhammad Shajid Khan</b></p> <p>Gender: <b>M</b> Country of Birth: <b>Pakistan</b></p> <p>Identify Number: <b>17301-143755-9</b></p> <p>Date of Birth: <b>17.03.1978</b></p> <p>Date of Issue: <b>10.08.2018</b></p>	 
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Amex "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 PK-101, Bannu-III

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JB

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

ATTESTED

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 MAWAZ 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 Khari,  
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 Shumroz 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 Khan,  
Candidate PK-101, Bannu  
Polling Station

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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 SHOAB 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

*[Handwritten signature]*

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Irfan Muhammad Khan  
Candidate PK-101, Bannu III  
Petitioner



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45-PS  
 (1) (1) (1) (1) (1)  
 4510

HO

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26-1-1985

PK-101-BANNU III

Sl. No.	Name of Polling Station	Area	Area	Area	Area	Area
1						1
2						2
3						3
4						4
5						5
6				07		6
7		646			646	7
8						8
9		174			174	9
10						10
11						11
12						12
13						13
14		23			23	14
15						15
16						16
Total		850			850	
(A) Total of Polling Stations						
		850				(B)
(C) Total of Polling Stations						
(D) Total of Polling Stations						
(E) Total of Polling Stations						
(F) Total of Polling Stations						
(G) Total of Polling Stations						
(H) Total of Polling Stations						
(I) Total of Polling Stations						
(J) Total of Polling Stations						

Muhammad Khalid  
 H.M.  
 P.O. Bannu III  
 District Bannu III

M. J. Khan  
 District Bannu III

The polling station was having  
 no facility for election papers

ESTE

of ...

26/1/85

ARALI SHAH  
 Commissioner Bannu  
 District Officer  
 Bannu-III

Shah Muhammad Khan  
 Candidate PK-101, Bannu III  
 Petitioner

ATTESTED

*[Signature]*

14

B  
1987 + 1986

45-  
[81(1)]

GIHSS

PK-101-BANNU-III

ردیف	نام	تاریخ	نوع	ملاحظات	تعداد	ملاحظات
1	2	3	4	5	6	7
1	...				81	
2	...				80	
3	...				00	
4	...				02	
5	...				00	
6	...				01	
7	...				38	✓
8	...				00	
9	...				304	✓
10	...				00	
11	...				07	
12	...				00	
13	...				00	
14	...				11	
15	...				00	
16	...					
					364	
(A) ...						
(B) ...						
(C) ...						
(D) ...						
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(I) ...						
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(S) ...						
(T) ...						
(U) ...						
(V) ...						
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(X) ...						
(Y) ...						
(Z) ...						

29

APDC

GIHSS

Signature: Sheer M. ... Khan

Candidate for ... Bannu-III

ATTESTED

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Annex "B"



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Block-"A": Opposite MPA's Hostel, Civil Secretariat Peshawar  
No. 091-9223533 Email: [eschoolmate@gmail.com](mailto:eschoolmate@gmail.com)



Dated Peshawar 20<sup>th</sup> September, 2024

**NOTIFICATION**

NO.SO(S/M)/E&SED/5-18/2024: The following posting/ transfer are hereby ordered, in relaxation of ban, in the public interest, with immediate effect:-

Sr.	Name & Designation	FROM	TO	Remarks
01.	Mr. Irfan Ali Shah Vice Principal (BS-18)	GHS No.2 Bannu City	Principal (BS-18) GHS Nagri Totial Abbottabad	A.V.P
02.	Muhammad Khalid Khan Head Master (BS-17)	GHS Ismaill Mama Khel Bannu	Head Master (BS-17) GHS Ganderi Waziran Hangu	A.V.P
03.	Muhammad Shamroz Khan, SS Statistics (BS-17)	GHSS Mamash Khel Bannu	Head Master BS-17 GHS Nayan Banda Hangu	A.V.P

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

Endst: of even No. & Date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, EMIS E&SE Department.
4. District Education Officer (Male) concerned.
5. District Accounts Officer concerned.
6. PS to Minister for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Deputy Secretary (Estt.) E&SE Department.
9. Officers concerned.
10. Office order file.

*R. A. P. 20/09/2024*  
SECTION OFFICER (SCHOOLS MALE)

**ATTESTED**

*[Handwritten signature]*

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Amma "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)

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1/10

ATTESTED

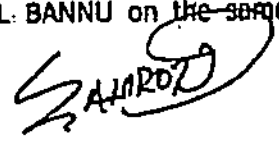
*[Handwritten signature]*

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 Notification No. SO (S/M)/E&SED/5-18/2024 DATED Peshawar 20<sup>th</sup> September, 2024, from GHSS MAMASH KHEL BANNU to GHS NAYAN BANDA HANGU 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 mala fide, 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 GHSS MAMASH KHEL BANNU on the same post for the sake justice, please.



MUHAMMAD SHAMROZ KHAN  
SS Statistic  
GHSS MAMASH KHEL 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  




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

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Amed "D"

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, Tolia 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.

*[Signature]*  
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)

ATTESTED

19

**NOTIFICATION**

**NO. SOGSM/1 & S/10/3-18/2023/M**

The following posting transfers are for the

immediate effect in the best public interest

Sr	Name & Designation	From	To	Remarks
1	Saif Ur Rehman IP (BS-17)	GISS Lashu Khel Hangu	GISS Mohib Banda Marolan	Against the vacant post of IP (BS-17)
2	Muhammad Akbar Khan SIPE (BS-18)	GISS Shaker Dara Kohat	GISS Muhammadzai Kohat	Against the vacant post of SIPE (BS-18)
3	Fahir Shah SS Economics (BS-17)	GISS Nandraka Kohat	GISS Masha Mansoor Lakki Marwat	Against the vacant post of SS Economics (BS-17)
4	Shamroz Khan SS Statistics (BS-17)	GISS Kotka Muhammad Khan Danna	GISS Mamash Khel Danna	Against the vacant post of SS Statistics (BS-17)
5	Muhammad Awais Arif IPE (BS-17)	GISS Kotigram Dir Lower	GISS Landiwah Lakki Marwat	Against the vacant post of SS Urdu (BS-17)
6	Mr. Afaq Ur Rehman SS Pashto (BS-17)	Waiting for posting	GISS Hayatabad Peshawar	Against the vacant post of SS Pashto (BS-17)

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

**Endst. of even No. & Date**

**Copy forwarded to the:**

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, EMIS E&SE Department.
4. District Education Officer (M) Concerned.
5. District Accounts Officer Concerned.
6. Principal Concerned.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (Estab) E&SE Department.
9. Officer Concerned.
10. Office order file.

ABDUL HAQ

SECTION OFFICER (SCHOOLS) M.A.

**ATTESTED**

*[Handwritten signature]*



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
 Block 'A' Opposite MPA's Hostel, Civil Secretariat Peshawar  
 Phone No. 91, 92, 93, Email: eschoolmate@umail.gov.pk

19-A

Better copy

Peshawar, Dated: 12.12.2023

**NOTIFICATION**

**NO. SO/SME&SED/S-18/2023/**

The following posting/transfer are hereby ordered with immediate effect in the best public interest.

Sr#	Name & Designation	From	To	Remarks
1	Saif Ur Reyhan IPE (BS-17)	GHSS Lodi Khel Hangu	GHSS Mohib Banda Mardan	Against the vacant post IPE (BS-17)
2	Muhammad Akbar Khan SIPE (BS-18)	GHSS Shaker Daro Kohat	GHSS Muhammadzai Kohat	Against the vacant post of SIPE (BS-18)
3	Tahir Shah SS Economics (BS-17)	GHSS Nandraka Kohat	GHSS Masha Mansoor Lakki Marwat	Against the vacant post of SS Economics (BS-17)
4	Shamroz Khan SS	GHSS Kotka Khin Bannu	GHSS Masha Khin Bannu	Against the vacant post of SS
5	Muhammad Awnis Arif IPE (BS-17)	GHSS Kotigram Dir Lower	GHSS Landiwah Lakki Marwat	Against the vacant post of SS Urdu (BS-17)
6	M. Asim IPE Rehman SS (BS-17)	Walitna for posting	GHSS Peshawar	Against the vacant post of IPE (BS-17)

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

Findst: of even No. & Dnt

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, EMIS E&SE Department.
4. District Education Officer (M) Concerned.
5. District Accounts Officer Concerned.
6. Principal Concerned.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (Estab) E&SE Department.
9. Officer Concerned.
10. Office order file.

SECTION OFFICER (SCHOOLS MATR)

**ATTESTED**



**BETTER COPY of page (19)**

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
Block-A, Opposite MPA Hostel, Civil Secretariat, Peshawar**

Peshawar: Dated: 13-12- 2023

**NOTIFICATION**

**NO.SO(SM)E &SED/5-18/2023/:** The following posting Transfer are hereby ordered with immediate effect in the best public interest;

Sr	Name & Designation	From	To	Remarks
1	Saif-ur-Rehman IPE (BS-17)	GHSS Lodhi Khel Hangu	GHSS Mohib Banda Mardan	Against the vacant post IPE (BS-17)
2	Muhammad Akbar Khan SIPE (BS-17)	GHSS Shuker Dara Kohat	GHSS Mohammadzai Kohat	Against the vacant post SIPE (BS-17)
3	Tahir Shah SS Economics (BS-17)	GHSS Nandraka Kohat	GHSS Masha Mansoor Lakki Marwat	Against the vacant of SS Economics (BS-17)
4	Shamroz Khan SS Statistics (BS-17)	GHSS Kotka Muhammad Khan Bannu	GHSS Mamash Khel, Bannu	Against the vacant post SS Statistics (BS-17)
5	Muhammad Awais Arif IPE (BS-17)	GHSS Kotigram Dir Lower	GHSS Landiwah Lakki Marwat	Against the vacant post SS Urdu (BS- 17)
6	Mr. Atiq-ur-Rehman SS Pashto (BS-17)	Waiting for posting	GHSS Hayatabad, Peshawar	Against the vacant post SS Islamiat (BS-17)




SD/  
Secretary To Govt Of Khyber Pakhtunkhwa  
E & SE Department

Copy forwarded to:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E & SE Khyber Pakhtunkhwa, Peshawar
3. Director EMIS E & SE Department, Peshawar
4. District Education officer concern
5. District account officer concern
6. PS to Advisor to Chief Minister E & SE Department.
7. PS to Secretary E & SE Department.
8. PA to Additional Secretary E & SE Department
9. The Officer Concerned.
10. Officer order file.

SD  
Section Officer (Schools Male)

20

59787	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈوکیٹ: ضریحان اللہ شہزاد	  
بار کونسل ایسوسی ایشن نمبر: 3153-11-11-11	
رابطہ نمبر: 9171522-321-0	

بعدالت جناب: خیبر پختونخواہ ہائی کورٹ

مخاطب: ایڈوانس	دعویٰ: سروس ریس
محمد شہزاد رفان	علت نمبر:
بنام	مورخہ:
سکریٹری SFC ملہ ف مینا	جرم:
	تھانہ:

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ ر

آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کے مقدمہ کی کل کاروائی کا کالہ اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر نمائندگی و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کے یکطرفہ یا اپیل کی برائگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کو اپنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا سائیکل پر دائرہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ الزامی مقدمہ کے سبب سے ہوگا قانونی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب جانبدار ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 10/11/2022

مقام ریسٹ ہاؤس واہ شہد الع بد کے لیے منظور ہے۔

Accepted by

Taimar

محمد شہزاد رفان ایڈوانس