


# FORM OF ORDER SHEET

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

Appeal No. 1890/2024

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 #1890/2024

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

Irfan Ali Shah

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. Irfan Ali Shah received today i.e on 08.10.2024 is incomplete on the following score which is returned to the counsel for the appellat 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.

No. 885 /Inst./2024/KPST,

Dt. 09/10 /2024.

*Amrullah*  
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  
Re submitted for further proceeding

*F*  
Farhan ullah Shahbanzai

10/10/2024

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

Service Appeal No. 1890 / of 2024


Irfan Ali Shah .....Appellant

**VERSUS**

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

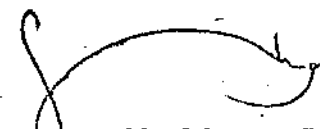
**I N D E X**

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
6)	Waqalat Nama		19

  
APPELLANT.

Dated; 08 /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. 1890 / of 2024

Irfan Ali Shah Vice Principal (BS-18), Govt High School No.2, Bannu City.

.....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 AT GOVT HIGH  
SCHOOL NAGRI TOTIAL ABBOTTABAD AND  
DEPARTMENTAL APPEAL OF THE  
APPELLANT AGAINST THE SAID ORDER  
WAS ALSO REGRETTED 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 Vice Principal(BS-18), at Government High School No.2 Bannu.
2. That the appellant was performing his duty as Vice Principal at Government High School No.2 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.

- 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 Hona'ble Tribunal.
- I. That keeping in view the principal of equity and fair treatment, in alternative appellant was required to be posted in some other school of the same District or otherwise the appellant could be posted to the nearest district of District Bannu, but all of sudden the appellant was posted at Abbottabad, which amount to highest degree of difficulties to the appellant as well as his entire family, hence the impugned orders are liable to be reconsidered.
- J. 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 order No.SO(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 appellant from the post of Vice Principal at GHS No.2 Bannu City, 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 appellant.**

Dated: 08/10/2024

APPELLANT.

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

Irfan Ali Shah  
.....Appellant.

**VERSUS**

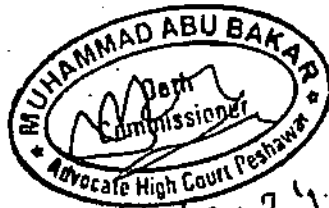
Secretary of E & SE & Others  
.....Respondents.

**AFFIDAVIT**

I, Irfan Ali Shah Vice Principal (BS-18), Govt High School No.2, Bannu City (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



8/10/2024

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

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

Irfan Ali Shah

.....Appellant.

VERSUS

Secretary of E & SE & Others

.....Respondents.

**ADDRESSES OF THE PARTIES**

Irfan Ali Shah Vice Principal (BS-18), Govt High School No.2, Bannu City.

.....Appellant.

VERSUS

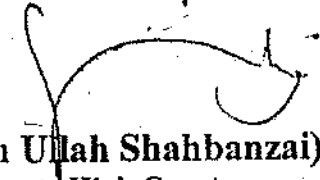
1. Secretary of Govt of Khyber Pakhtunkhwa Elementary & Secondary Education (E & SE) Department, at Civil Secretariat Peshawar.
2. Director E & SE Department, at Civil Secretariat Peshawar.
3. District Education Officer (male), Bannu.

.....Respondents.

  
APPELLANT.

Dated; 08/10/2024.

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

Irfan Ali Shah.....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 filling 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 GHS No.2 Bannu City as Vice Principal and posted at GHS Nagri Totial, Abbottabad.
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.

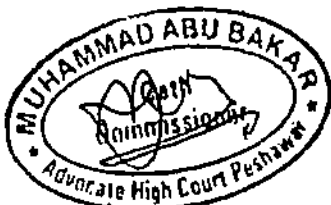
It is therefore humbly prayed that on acceptance of this application the operation of the impugned transfer & posting order dated: 20-09-2024 of the appellant may kindly be suspended till the final disposal of instant service appeal.

Dated 8/10/24 -10-2024

  
APPELLANT/PETITIONER

Through:-

  
(Farhan Ullah Shahbanzai)  
Advocate High Court,  
PESHAWAR



8/10/24 **AFFIDAVIT.**

I, Irfan Ali Shah (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.

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PAKISTAN National Identity Card

Name  
Irfan Ali Shah



Father's Name  
Noor Jehan Shah



Gender: M Country of Stay: Pakistan

Identity Number: 11101-1491785-1 Date of Birth: 25.03.1982

Date of Issue: 11.02.2021 Date of Expiry: 11.02.2031

Holder's Signature

11101-1491785-1



مشاورہ: وزیر اعلیٰ، حکومت سندھ، اسلام آباد

1011011531000  
155-02-6185531

گمشدہ کارڈ ملنے پر قریبی ایئر بس میں ڈال دیں

ATTESTED

*[Handwritten signature]*

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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 Muhammad 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

(P) (9)

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 III  
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 II  
 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 Khan,  
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 SHOAI B 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 Khej, Farhad Gul PSHT

ATTESTED

Irfan Muhammad Khan  
Candidate PK-101, Bannu U  
Petitioner

ATTESTED

Shah Muhammad Khan  
Candidate Pk-101, Bannu II  
Polling Station

ARALI SHAH  
Assistant Officer  
Bannu

of 00015

the polling station was having

one facility for election parties

1	050	050	050	050
2	050	050	050	050
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4	050	050	050	050
5	050	050	050	050
6	050	050	050	050
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48	050	050	050	050
49	050	050	050	050
50	050	050	050	050

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ATTESTED

Prisoner's Name: Sheh Wali Khan

Roll No: 11101121212121212121

APDC No: 11101121212121212121

APDC Date: 11/11/11

APDC No: 11101121212121212121

APDC Date: 11/11/11

Sl. No.	Particulars	Debit	Credit	Balance
10				364
15	10/11/11	00		00
14	10/11/11	11		11
13	10/11/11	00		00
12	10/11/11	00		00
11	10/11/11	02		02
10	10/11/11	00		00
9	10/11/11	304		304
8	10/11/11	00		00
7	10/11/11	38		38
6	10/11/11	01		01
5	10/11/11	00		00
4	10/11/11	02		02
3	10/11/11	00		00
2	10/11/11	00		00
1	10/11/11	01		01

APDC No: 11101121212121212121

APDC Date: 11/11/11

APDC No: 11101121212121212121

APDC Date: 11/11/11

106

106

106

114

45-26  
181(1) 11/11/11

PK-101-BANNUM III

Handwritten notes: (H) (15) Annex "B"

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

Handwritten signature and date: 20/09/2024  
SECTION OFFICER (SCHOOLS MALE)

**ATTESTED**

Handwritten signature

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Annex "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, Invelgle 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  
1/10/24

SO (SM)  
1/10

ATTESTED

17

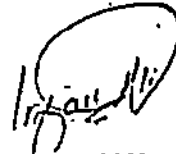
purpose I have sold proof as evidence and live human being as eyes witness of the occurrence.

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 Notification No. SO (S/M)/E&SED/5-18/2024 DATED Peshawar 20<sup>th</sup> September, 2024, from GHS NO 2 Bannu to GHS Nagri Total Abbotabad 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 GHS NO 2 Bannu on the same post for the sake justice, please.

  
IRFAN ALI SHAH  
VICE PRINCIPAL  
GHS NO 2 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  




Annex "D" (18)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9273533 Email: sschoolsmaile@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, 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.

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)

**ATTESTED**

59785	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈویکٹ: عرفان اللہ شاہ نوری	PESHAWAR BAR ASSOCIATION
بار کونسل ایسوسی ایشن نمبر: BC-11-3103	
رابطہ نمبر: 0321-9171522	

19

بعدالت جناب: سروس ٹریبونل KPIC پشاور

مخاطب:	دعویٰ: سروس ایس
عرفان علی شاہ	علت نمبر: 2
بنام	مورخہ:
سکریٹری (EGSE) پشاور	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کالہ اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر نمائندگی و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا تاخیر یا بیکطرفہ یا اپیل کی برائگی اور منسوخی، نیز دائر کرنے اپیل نمائندگی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کورواپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ ساتھ درخواست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائزہ التوائے مقدمہ کے سبب سے ہوگا اس کی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب چاہندے ہوں گے کہ پیروی مذکورہ کے لئے اس کا کالہ و کالہ نامہ لکھ دیا تاکہ سند رہے

عرفان علی شاہ (ایڈویکٹ)

المرقوم: 8/10/2024

المواہ شد العبد

مقام کے لیے منظور ہے۔

Accepted by  
Taimur

Handwritten signature