


FORM OF ORDER SHEET

Court of _____

Appeal No. 1891/2024

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>

The appeal of Mr. Muhammad Khaled Khan 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.
- 2- Page no. 19 of the appeal is illegible.

No. 884 /Inst./2024/KPST,

Dt. 9/10 /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
- ii- Objection regarding Page No. 19 has been removed and Better copy has been provided Resubmitted for further proceeding

Farmanullah Shahbanzai
Farmanullah Shahbanzai
10/10/2024

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

Muhammad Khalid 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

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

Service Appeal No. 1891 / of 2024

Muhammad Khalid 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 and CNIC		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
6)	Waqalat Nama		20


APPELLANT.

Dated; 07 /10/2024.

Through:-


(Farhan Uallah Shahbanzai)
Advocate High Court,
PESHAWAR

Office: FF.30, 5TH 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. 1891 / of 2024

Muhammad Khalid Khan, Head Master (BS-17), Govt High Ismaili Mama
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.

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 GANDERI WAZIRAN, 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 Head Master (BS-17), at Government High School Ismaili Khel Bannu.
2. That the appellant was performing his duty as Head Master at Government High School, Ismaili 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.261 at GHSS Musa Khel, Narmi (Male) during the 8TH 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, got more votes than any other from Polling station No.261, and thereafter the appellant was firstly order to increase the votes of the Ex-MPA, but when appellant denied, thereafter he 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.

GROUNDS:

- 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 Head Master at GHS Ismaili Khel, Mama 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.261 of GHSS Musa Khel, Narmi Khel of PK-101 (Bannu-III), as such it was not in the domain of the appellant to favor any candidate, but not extending the any favor to the Ex-MPA, the said Ex-MPA started victimization of the appellant, firstly the appellant was threaten to increase the vote of Ex-MPA, and thereafter the appellant was compel 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 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 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 Hangu, 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 Head Master at GHS Ismaili 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 appellant.

APPELLANT.

Dated: 08/10/2024

Through:-


(Taimur Khan Wazir)
Advocate High Court,
PESHAWAR


(Farhan Ullah Shahbanzai)
Advocate High Court,
PESHAWAR

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

Service Appeal No. _____ / of 2024

Muhammad Khalid Khan

.....Appellant.

VERSUS

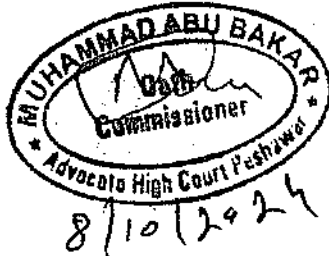
Secretary of E & SE & Others

.....Respondents.

AFFIDAVIT

I, **Muhammad Khalid Khan, Head Master (BS-17), Govt High Ismaili Mama 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.

Dated; 08 /10/2024



[Signature]
Deponent.

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

Service Appeal No. _____ / of 2024

Muhammad Khalid Khan
.....Appellant.

V E R S U S

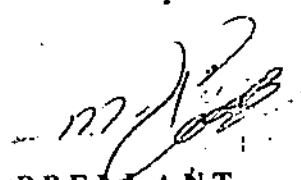
Secretary of E & SE & Others
.....Respondents.

ADDRESSES OF THE PARTIES

Muhammad Khalid Khan, Head Master (BS-17), Govt High Ismaili Mama
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.


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

Muhammad Khalid Khan.....VS..... Secretary E & SE & Others

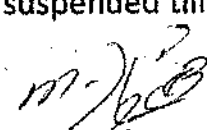
**Application For Suspension of Operation of the
Impugned transfer/posting order dated:20-09-
2024 of the appellant till the final disposal of the
above mentioned appeal.**

That the petitioner/appellant respectfully submits as under.


1. That the petitioner is 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 Ismaili Khel, Bannu as Head Master and posted at GHS Ganderi Waziran, 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: 08-10-2024


APPELLANT/PETITIONER

Through:-


(Farhan Ullah Shahbanzai)
Advocate High Court,
PESHAWAR



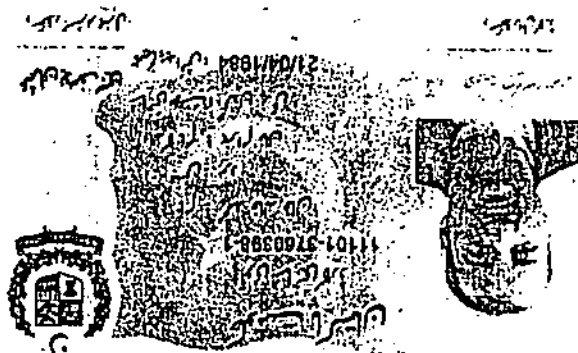
8/10/2024
AFFIDAVIT.
I, Muhammad Khalid Khan (Appellant), do hereby solemnly affirm and states on oath that the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' able Court.


Deponent.

ATTESTED



UZYSRO 11101-3760388-1
15684817153
04/03/2025 04/03/2015



(t)

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Ammal "A"

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

Election Petition No. _____ /2024.

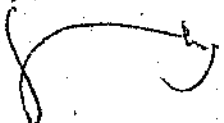
Shah Muhammad Khan Son of Amanullah Khan,
Resident of Narmi Khel Baka Khel Wazir,
Tehsil Baka Khel & District Bannu.
Contesting Candidate (Independent),
For election to the Khyber Pakhtunkhwa Provincial Assembly
Constituency: PK-101 Bannu-III)

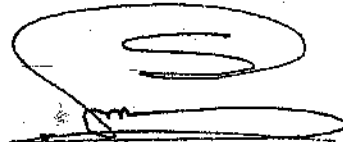
..... (Petitioner)

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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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 Nour 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

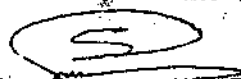
Shah Muhammad Khan,
Candidate PK-101, Bannu III
Petitioner

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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 Akhya 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

ALLEGED


Shair Muhammad Khatt,
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

ATTESTED

Shah Muhammad Khan
Candidate PK-101, Bannu III
Polling Officer

ATTESTED

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

RAJI SHAH
Polling Officer
Bannu-III

of on date: 28/01/2018

The Polling Station was having the facility for election papers

Sl. No.	Name of Candidate	Party	Number of Papers	Number of Papers Issued	Number of Papers Returned	Number of Papers Burnt	Remarks
1	Shah Muhammad Khan	PK-101	850	850	850	0	
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							

13

100

28/01/2018

ATTESTED

Candidate's Name			Roll Number		
Shah Mohammad Khan			11111111111111111111		
Father's Name			11111111111111111111		
Address			11111111111111111111		
City			11111111111111111111		
District			11111111111111111111		
Province			11111111111111111111		
Country			11111111111111111111		
Date			11111111111111111111		
Signature			11111111111111111111		
Date			11111111111111111111		
City			11111111111111111111		
District			11111111111111111111		
Province			11111111111111111111		
Country			11111111111111111111		
16					
15	00				
14	11				
13	00				
12	00				
11	02				
10	00				
9	304				
8	00				
7	38				
6	01				
5	00				
4	02				
3	00				
2	00				
1	81				

29

985 + 186

14

45-80

PR-101-BANNU-III

11111111111111111111

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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: eschoolmale@gmail.com



Dated Peshawar 20th 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 Tolia Abbottabad	A.V.P
02.	Muhammad Khalid Khan Head Master (BS-17)	GHS Ismaili- 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.

ATTESTED

[Handwritten signature]

[Handwritten signature] 20/09/2024
SECTION OFFICER (SCHOOLS MALE)

16

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
1/1/24

SO (SM)
1/1/24

ATTESTED

[Handwritten signature]

17

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 20th September, 2024, from GHS Ismaili Mama Khel to GHS Ganderi Waziran 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 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 Ismaili Mama Khel NO 2 Bannu on the same post for the sake justice, please.

M. Khalid.

**MUHAMMAD KHALID KHAN
HEAD MASTER
GHS ISMIALI MAMA KHEL**

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

[Signature]
ATTESTED



18 Annex "D"

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-92115311 Email: 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, Total 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)

Ends: 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

ATTESTED

SECTION OFFICER (SCHOOLS MAINT)
GARDI, HAQI

- 1. Accountant General, Khyber Pakhtunkhwa Peshawar
- 2. Director, F&SF, F&SF, Department
- 3. Director, F&SF, F&SF, Department
- 4. District Education Officer (AM) Concerned
- 5. District Accounts Officer (AM) Concerned
- 6. Principal Concerned
- 7. PS to Advisor to Chief Minister for F&SF Department
- 8. PS to Secretary, F&SF, Department
- 9. PS to Additional Secretary (I study) F&SF Department
- 10. Officer (concerned)
- 11. Officer order file

1 copy forwarded to the
Index of even No. & Date

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
F&SF DEPARTMENT

Notified from GHS-17/2022/P&SF
Ministry of Health, Khyber Pakhtunkhwa, Peshawar
dated 12 June 2023

NOTIFICATION



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELT&N&A SECTIONARY OFFICER DEPARTMENT
Block-A, Girdgah (MVA) House, Govt Secretariat Peshawar
Peshawar, Khyber Pakhtunkhwa, Pakistan

19

BETTER COPY

P-19

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

Peshawar: Dated: 12 June 2023

NOTIFICATION

NO.SO(S/M)E&SED/5-17/2022/PT/SS: Muhammad Khalid Khan SS Chemistry (BS-17) is hereby transferred from GHSS Ajmal Badashi Daud Shah Bannu to GHS Ismaili Mama Khel Bannu against the vacant post of Head Master (BS-17) with immediate effect, in the best public interest.

**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. The Officer Concerned.

**SD
Section Officer (Schools Male)**

RECEIVED
12/6/2023

Painur

Accepted by




پشاور بار ایسوسی ایشن
PESHAWAR BAR ASSOCIATION
KHYBER PAKHTOONKHA

مقدمہ: مندرجہ ذیل شخص نے پشاور بار ایسوسی ایشن کے قواعد و ضوابط کی وضاحت اور اس کی افہامیابی کے لیے درخواست کی ہے۔ اس شخص نے پشاور بار ایسوسی ایشن کے قواعد و ضوابط کی وضاحت اور اس کی افہامیابی کے لیے درخواست کی ہے۔ اس شخص نے پشاور بار ایسوسی ایشن کے قواعد و ضوابط کی وضاحت اور اس کی افہامیابی کے لیے درخواست کی ہے۔

محمد رضا لوفان (ریٹائرڈ)

پشاور بار ایسوسی ایشن	
نام:	محمد رضا لوفان
پتہ:	پشاور
تعلقہ:	
صوبہ:	
تاریخ:	
دوسری:	

پشاور بار ایسوسی ایشن کے قواعد و ضوابط کی وضاحت اور اس کی افہامیابی کے لیے درخواست کی ہے۔

  	پشاور بار ایسوسی ایشن 59788
	پشاور بار ایسوسی ایشن 0321-9171222

پشاور بار ایسوسی ایشن کے قواعد و ضوابط کی وضاحت اور اس کی افہامیابی کے لیے درخواست کی ہے۔