

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Service Appeal No. 5369/2020

Date of Institution ... 05.06.2020

Date of Decision ... 30.06.2022

Mst. Tahira Naz D/O Afzal Khan, Ex-SST (Gen), R/O Village Mughal Banda, P.O Saro Shah, Tehsil Takhbhai, District Mardan.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar and two others.

... (Respondents)

MR. AMIN-UR-REHMAN YUSUFZAI,
Advocate

For appellant.

MR. RIAZ KHAN PAINDAKHEL,
Assistant Advocate General

For respondents.

MR. SALAH-UD-DIN
MS. ROZINA REHMAN

MEMBER (JUDICIAL)
MEMBER (JUDICIAL)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Through the instant service appeal, the appellant has invoked jurisdiction of this Tribunal with the prayer copied as below:-

"On acceptance of instant service appeal, the impugned Notification dated 09.12.2019 of respondent No. 2 alongwith Pre & Post proceedings thereto, may be declared as illegal, unlawful, without lawful authority, void ab-initio and of no legal effect, hence be set at naught and appellant may be reinstated in



service with all back benefits, in the best interest of justice and equity."

2. Briefly stated the facts as averred by the appellant in her appeal are that Khyber Pakhtunkhwa Public Service Commission advertised various posts of SETs/SSTs (BPS-16) vide advertisement No. 1/2009 dated 26.01.2009. The appellant being duly qualified for the advertised post, applied for the post of SST (G) (BPS-16) and got through the selection process successfully. Upon recommendations of Khyber Pakhtunkhwa Public Service Commission, she was appointed as SST (G) (BPS-16) on regular basis vide Notification dated 25.06.2012. The appellant assumed the charge of her post in Government Girls Middle School Janat Mir Kot Mohmand Agency (Now District Mohmand). The pay of the appellant was unilaterally stopped in the month of February 2019, despite the fact that she was regularly performing her duty. the appellant approached worthy Peshawar High Court, Peshawar through filing of Writ Petition for release of her salary but in the meanwhile, she was issued show-cause notice, which was duly replied by the appellant. Astonishingly, the competent Authority issued impugned Notification dated 09.12.2019, whereby her appointment Notification dated 25.06.2012 was disowned without conducting any regular inquiry or affording any opportunity of self defense to the appellant. The impugned Notification dated 09.12.2019 was challenged by the appellant through filing of departmental appeal, however the same was not responded, hence the instant service appeal.

3. Respondents contested the appeal by way of submitting para-wise comments, wherein they refuted the stance taken by the appellant in his appeal.

4. Learned counsel for the appellant has argued that the appellant was duly appointed as SST (G) (BPS-16) upon recommendations of Khyber Pakhtunkhwa Public Service Commission; that the appellant performed her duty in various schools for about seven years and was awarded commendation

certificate but the competent Authority issued a wrong and illegal Notification dated 09.12.2019, whereby the appointment notification of the appellant was disowned; that the appellant regularly performed her duty with zeal and zest and received salary till January 2019, where-after her salary was stopped without any legal justification; that no regular inquiry was conducted in the matter and appointment order of the appellant was disowned without any legal justification; that no opportunity of personal hearing or self defense was provided to the appellant and she has been condemned unheard; Reliance was placed on 2011 SCMR 1581, 2004 SCMR 303, 2016 SCMR 1299, PLD 2010 Supreme Court 483 and judgment dated 20.01.2021 passed by this Tribunal in Service Appeal No. 1014/2019 titled "Mst. Ishrat Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar and two others".

5. Conversely, learned Assistant Advocate General for the respondents has contended that the appellant had not at all appeared in the competitive examination for the post of SST (G) (BPS-16) and her appointment Notification dated 25.06.2012 was found fake during the inquiry; that the appellant could not produce any recommendation letter of Khyber Pakhtunkhwa Public Service Commission, whereby she was recommended for appointment as SST (G) (BPS-16); that a thorough inquiry was conducted in the matter and it was found that the appellant had procured her appointment through bogus means, therefore, the competent Authority has rightly disowned the appointment order of the appellant by declaring the same as void ab-initio being fake and bogus; that the instant service appeal has been filed by the appellant beyond the period of limitation and is liable to be dismissed on this score alone.

6. Arguments have already been heard and record perused.

7. A perusal of the record would show that the appellant alongwith her appeal has annexed copy of Notification dated 25.06.2012, allegedly issued by Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar, whereby appellant was appointed as SST (G) (BPS-16). It is an undisputed

fact that the appellant performed duties in various schools for about seven years and has received her salary till the month of January 2019. Vide impugned Notification dated 09.12.2019 passed by Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar, the order of appointment of the appellant was disowned on the ground that the same was found bogus. The issue of genuineness or otherwise of the appointment order of the appellant could best be determined after proper inquiry in the matter by giving opportunity to the appellant to defend herself. However, on bare perusal of the impugned Notification dated 09.12.2019, it is evident that no proper inquiry was conducted in the matter and the appellant was thus condemned unheard. The appellant has served for about seven years, therefore, competent Authority was required to have conducted a proper inquiry into the matter prior to passing of the impugned order dated 09.12.2019, whereby the appointment order of the appellant has been disowned. The appellant has not been provided fair opportunity to defend herself. The impugned Notification dated 09.12.2019 is thus not sustainable in the eye of law and is liable to be set-aside.

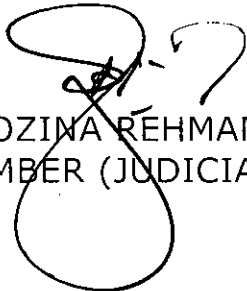


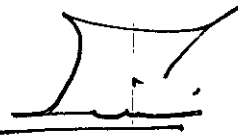
8. In wake of COVID-19, the Government of Khyber Pakhtunkhwa declared Public Health Emergency for the first time in March, 2020 for three months, which was extended from time to time for further term. The case of the appellant falls within the period of emergency. In view of Section-30 of the Khyber Pakhtunkhwa Epidemic Control and Emergency Relief Act, 2020, the limitation period provided under any law shall remain frozen. The service appeal has though been filed beyond the period of limitation, however in view of Section-30 of the Khyber Pakhtunkhwa Epidemic Control and Emergency Relief Act, 2020, the appeal in hand is not hit by limitation.

9. In view of the above discussion, the appeal in hand is allowed by setting-aside the impugned Notification dated 09.12.2019. The appellant is reinstated in service for the purpose of inquiry and the matter is remitted to the competent Authority to conduct a thorough and proper inquiry within a period of 90 days of receipt of copy of this judgment. The appellant shall be

associated with the inquiry by providing her fair opportunity of defending herself. The issue of benefits shall be subject to outcome of the inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
30.06.2022


(ROZINA REHMAN)
MEMBER (JUDICIAL)

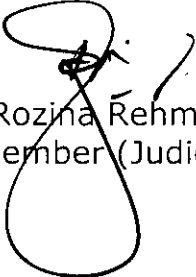

(SALAH-UD-DIN)
MEMBER (JUDICIAL)

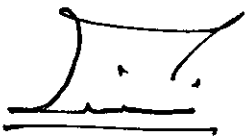
O R D E R
30.06.2022

Learned counsel for the appellant present. Mr. Riaz Khan Paindakhel, Assistant Advocate General for the respondents present. Arguments have already been heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand is allowed by setting-aside the impugned Notification dated 09.12.2019. The appellant is reinstated in service for the purpose of inquiry and the matter is remitted to the competent Authority to conduct a thorough and proper inquiry within a period of 90 days of receipt of copy of this judgment. The appellant shall be associated with the inquiry by providing her fair opportunity of defending herself. The issue of benefits shall be subject to outcome of the inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
30.06.2022

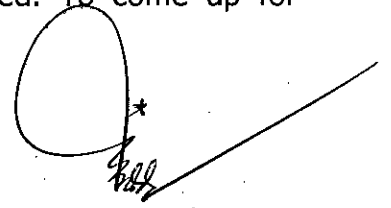

(Rozina Rehman)
Member (Judicial)


(Salah-Ud-Din)
Member (Judicial)

06.12.2021

Clerk of counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. haseen Ullah, Assistant for respondents present.

Written reply/comments on behalf of the respondents submitted which is placed on file. Adjourned. To come up for arguments on 07.03.2022 before D.B.



(MIAN MUHAMMAD)
MEMBER (E)


7-3-22

*Due to retirement of the Honble
Chairman the case is adjourned on
28-6-22
Justice
Rehman*

28.06.2022

Learned counsel for the appellant present. Mr. Riaz Khan Paindakheil, Assistant Advocate General for respondents present.

Arguments heard. To come up for order on 30.06.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah Ud Din)
Member (J)

15.07.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Respondent No. 3 has submitted reply. Remaining respondents have not submitted written reply/comments. Learned AAG is directed to contact them for submission of written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 06.12.2021 before the D.B.

Stipulated period has passed and reply has not been submitted.


Chairman

P.S

28.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.

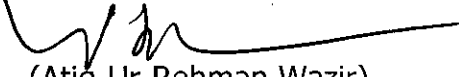

Chairman

[Handwritten mark]

29.12.2020

Junior to counsel for the appellant and Muhammad Rasheed DDA alongwith Abdul Waheed litigation Officer for respondent No. 1 & 2 and Mehtab Gul Superintendent for respondent No.3 present.

Representative of respondent No.3 submitted reply/comments which is made part of the record. Representative of respondents No. 1 & 2 seeks time to submit reply/comments. Granted. To come up for reply/comments on 15.02.2021 before S.B.


(Atiq-Ur-Rehman Wazir)
Member (E)

15.02.2021

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Haseenullah, Senior Clerk, for the respondents are also present.

Written reply on behalf of respondent No. 3 has already been submitted while representative of respondents No. 1 & 2 is seeking further time for submission of written reply/comments. Last chance is given to respondents No. 1 & 2 for filing of written reply/comments on 07.04.2021 before S.B.


(Muhammad Jamal Khan)
Member

07.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 15.07.2021 for the same as before.


READER

03.09.2020

Counsel for the appellant present.

On the strength of admitting note dated 06.09.2019 recorded in Appeal No. 958/2019, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 02.11.2020 before S.B.

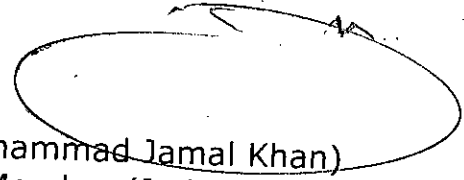
Alongwith the appeal there is an application for order requiring maintenance of status quo. Notice of the application be also given to the respondents for the date fixed.


Chairman

02.11.2020

Nemo for appellant. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Mehtab Gul, Litigation Officer, for the respondents are also present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking time for submission of written reply/comments. Time granted. File to come up for written reply/comments on 29.12.2020 before S.B.





(Muhammad Jamal Khan)
Member (Judicial)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 5369 /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/06/2020	<p>The appeal of Mst. Thira Naz presented today by Mr. Amin-ur-Rehman Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>29/06/20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-	29.06.2020	<p>The Worthy Chairman is on leave, therefore, the case is adjourned. To come up on 03.09.2020 before S.B.</p> <p style="text-align: right;"> Reader</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

536A
Service Appeal No. ___/2020

Mst. Tahira Naz Appellant

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others Respondents

I N D E X

S.No.	Description of documents	Annex	Pages
1.	Service Appeal		1-4
2.	Application for grant of Status Quo alongwith Affidavit		5-6
3.	Application for condonation of delay alongwith Affidavit		7-8
4.	Addresses of the parties		9
5.	Copy of CNIC	A	10
6.	Copies of Educational Testimonials	B	11-15
7.	Copy of Advertisement dated: 26.01.2009	C	16-21
8.	Copy of Appointment Notification dated: 25.06.2012 alongwith Medical Certificate dated: 16.05.2012	D	22-24
9.	Copy of Adjustment Order dated: 31.07.2012 alongwith charge report dated: 31.07.2012	E	25-26
10.	Copies of order sheets dated: 17.09.2019 & 16.01.2020 of the Hon'ble Peshawar High Court, Peshawar alongwith pay slips, departmental appeal & office letter dated: 09.04.2019	F	27-34
11.	Copy of show cause notice dated: 02.10.2019 alongwith reply dated: 21.10.2019	G	35-41
12.	Copy of impugned notification dated: 09.12.2019 alongwith departmental appeal dated: 18.12.2019	H	42-43
13.	Wakalatnama		44



Appellant

Through

Amin ur Rehman Yusufzai 

Sajjad Mehsud 

&


Khalid Khan
Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar
Cell No.0321-9022964, 0333-9981464

Dated: 03/06/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

5369

Service Appeal No. ___/2020

Mst. Tahira Naz D/O Afzal Khan, Ex-SST (Gen),
R/O Village Mughal Banda, P.O Saro Shah,
Tehsil Takhbhai, District Mardan

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 4688 Appellant

.... **V E R S U S** Dated 25/6/2020

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
 3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt:
- Respondents**

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:

NOTIFICATION ENDORSEMENT NO.4061-70/A-17/ SST/ Complaint/Tahira Naz/Swabi, DATED: 09.12.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 25.06.2012, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED AND DECLARED LIABLE TO BE PROCEEDED AGAINST UNDER SECTION 419/420 PPC BY THE LAW ENFORCING AGENCY.

PRAYER-IN-APPEAL:

On Acceptance of Instant Appeal, the Impugned Notification dated 09.12.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as Illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence, be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Filed to-day

Registrar

5/6/2020

Respectfully Sheweth:

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of District Mardan.
(Copy of CNIC, is attached as Annexure "A")
2. That appellant as M.A M.Ed & B.A B.Ed qualified, besides having Primary Teaching Certificate, at her credit.
(Copies of Educational Testimonials alongwith training certificates, are attached as Annexure "B")
3. That respondent No.3, invited applications for numerous vacant positions of SETs/SSTs (BPS-16) vide Advertisement No.01/2009, dated: 26.01.2009.
(Copy of Advertisement dated: 26.01.2009, is attached as Annexure "C")

4. That appellant, being qualified, applied for one of the aforementioned advertised posts of SSTs (BPS-16) and gone through the entire process of selection successfully, eventually she, on the recommendation of KP PSC, has been appointed as SST (Gen) BPS-16, on regular basis, vide Notification Endorsement No.2816-23/File No.2/A-14/SST(F) Gen/ PSA/ Apptt: dated: 25.06.2012.
(Copy of Appointment Notification dated: 25.06.2012 alongwith Medical Certificate dated: 16.05.2012, is attached as Annexure "D")
5. That appellant was subsequently adjusted in Government Girls Middle School, Jannat Mir Kot, Mohmand Agency (now Tribal District Mohmand) i.e. against a vacant Post, vide Adjustment Order dated: 31.07.2012.
(Copy of Adjustment order dated: 31.07.2012 alongwith charge report dated: 31.07.2012, is attached as Annexure "E")
6. That the Respondent Department has unilaterally stopped monthly salary of the appellant, since February 2019, inspite of the fact that she was performing official duties with zeal, devotion and outmost satisfaction of the superiors, evident from Duty Performance Certificates, though she approached the competent authority for redressal of her grievances, evident from departmental appeal alongwith office letter dated: 09.04.2019, however her cries fell to deaf ear, eventually she approached the Hon'ble Peshawar High Court, Peshawar through Writ Petition No.2524-P/2019, which is still pending adjudication, evident from order sheets dated: 17.09.2019 & 16.01.2020.
(Copies of order sheets dated: 17.09.2019 & 16.01.2020 of the Hon'ble Peshawar High Court, Peshawar alongwith pay slips, departmental appeal & office letter dated: 09.04.2019 are attached as Annexure "F").
7. That the Respondent Department, instead to either release monthly salary of the appellant or to submit parawise comments in compliance of order sheets dated: 17.09.2019 & 16.01.2020 of the Hon'ble Peshawar High Court, Peshawar, issued show cause notice dated: 02.10.2019 to the appellant, which has duly been responded on 21.10.2019 and the appellant was waiting for conducting regular inquiry into her alleged accusation, however, astonished to receive impugned notification dated: 09.12.2019, vide which her appointment notification dated: 25.06.2012 has unilaterally been disowned and declared her as bogus SST(G). It is worth to mention that departmental appeal dated: 18.12.2019 of the appellant against the impugned notification dated: 09.12.2019 is pending before Respondent No.1, however, to no avail so far.
(Copies of Show Cause Notice dated: 02.10.2019 alongwith reply dated: 21.10.2019 and impugned notification dated: 09.12.2019 alongwith department appeal dated: 18.12.2019, are attached as Annexures "G" & "H" respectively).
8. That appellant, being aggrieved of impugned notification dated: 09.12.2019 and by not considering her departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

GROUND S:

- A. That impugned Notification dated: 09.12.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor she has been provided equal protection of law, rather she has not been provided fair opportunity to defend herself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department has acted without jurisdiction.

- C. That neither regular enquiry has been conducted into the guilt of the appellant nor she has been provided ample opportunity to defend herself in accordance with law/rules governing the subject, hence has condemned unheard, which attracts the doctrine of **audi alteram partem**.
- D. That appellant, being qualified, has been appointed, after due process of law and fulfilment of legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.
- E. That appellant has served the department with zeal, devotion and to the best of her abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

I. 2011 SCMR 1581

"Appointment order found to be bogus/fake/irregular Validity Such charge was vague, nonspecific and did not show any lapse on part of employee or commission of any fraud by him or non-possession of requisite qualification by him or his appointment to be made by an incompetent officer Department had not found performance of employee to be unsatisfactory Impugned order was set aside in circumstances"

II. 2004 SCMR 303

"Appointment of Civil Servants was made by Competent Authority. If prescribed procedure was not followed by the Concerned Authority the Civil Servants could not be blamed for what was to be performed and done by the Competent Authority. Supreme Court noted it with concern that in case the Civil Servants were to be removed then the same would amount to hitting them hard creating problems for the society at large considering each of the Civil Servants being the bread earner of his family. Appointing authorities had been acting mechanically without application of mind, therefore, the Civil Servant could not be made to suffer for whimsical and mechanical acts of the authorities."

III. 2016 SCMR 1299

"The solution we have come out is simple, let them continue, if they besides the certificates or diplomas, issued by the council, possesses the requisite or equivalent qualification. Let them all also continue who improve their qualification even thereafter. Those who could not improve their qualification up till now should improve it within a period of one year, which could be reckoned from the date of commencement of the next available academic session of the respective program."

IV. 2010 PLD SC 483

"Principle of audi-alteram partem was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, because no adverse action can be taken against a person without providing right of hearing to him"

- F. That the Respondent Department, prior to release monthly salary of appellant, not only verified her academics/professional degrees/ certificates but also her appointment notification, from the concerned quarters, evident from clearance certificate dated: 27.12.2012, but astonishingly the impugned unilateral notification dated: 09.12.2019 has been issued after about a lapse of more than 7 years, that too, without following the law/rules governing the subject, which speaks volumes of malafide on part of the Respondent Department.

G. That any other grounds, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant appeal, the impugned notification dated 09.12.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence, be set at naught and appellatant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Hon'ble Tribunal in circumstances of the case, may also be granted.

Tahir

Appellant

Through

Amin ur Rehman Yusufzai

S

Sajjad Mehsud

&

Khalid

Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 10.04.2020

VERIFICATION:

Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

Tahir

Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Civil Misc. No.____/2020

IN

Service Appeal No.____/2020

Mst. Tahira Naz **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

**APPLICATION FOR STATUS-QUO TILL FINAL DECISION OF THE
TITLED SERVICE APPEAL**

Respectfully Sheweth:-

1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant applicant.
3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted she will suffer irreparable loss.
4. That applicant has got good prima facie case in her favour and is very much sanguine of its success. Moreover, balance of convenience also lies in her favor.
5. That there is no legal bar to grant the subject relief, rather grant of status quo will prevent miscarriage of justice to be occasioned.

It is therefore, most humbly prayed that on acceptance of instant application, Status-quo may please be ordered to be maintained till final decision of the titled appeal, so as to secure the ends of justice.


Appellant

Through


Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: ³10.06.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Civil Misc. No. ____/2020
IN
Service Appeal No. ____/2020

Mst. Tahira Naz **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

AFFIDAVIT

I, Mst. Tahira Naz D/O Afzal Khan, Ex-SST (Gen), R/O Village Mughal Banda, P.O Saro Shah, Tehsil Takhbhai, District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying '**Application**' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:



Amin-ur-Rehman Yusufzai
Advocate, Peshawar



DEPONENT
CNIC #: 16102-4396142-4
03455492360
0312-5492360

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Civil Misc. No.____/2020

IN

Service Appeal No.____/2020

Mst: Tahira Naz **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:-

1. That impugned notification has been issued on 09.12.2019 and departmental appeal against whereof has been filed o 18.12.2019 while instant service appeal has been drafted on 10.04.2020 i.e. within the stipulated time, however, did not instituted as due the country wide lock down has been announced by the Government due to COVID-19, hence the instant application.
2. That delay occasioned in filing of titled appeal is not deliberated rather occasioned inadvertently, hence deserves to be condoned within the meaning of Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973.
3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted she will suffer irreparable loss.
4. That applicant has got good prima facie case in her favour and is very much sanguine of its success. Moreover, balance of convenience also lies in her favor.

It is therefore, most humbly prayed that on acceptance of instant application, delay occasioned in filing of titled appeal may be condoned, in the best interest of justice and equity.

Tahira Naz

Appellant

Through

Amin ur Rehman Yusufzai
Amin ur Rehman Yusufzai

Sajjad Mehsud

&

Khalid Khan
Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: ³10.06.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Civil Misc. No._____/2020

IN

Service Appeal No._____/2020

Mst. Tahira Naz **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

AFFIDAVIT

I, Mst. Tahira Naz D/O Afzal Khan, Ex-SST (Gen), R/O Village Mughal Banda, P.O Saro Shah, Tehsil Takhbhai, District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying '**Application**' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:



Amin-ur-Rehman Yusufzai
Advocate, Peshawar



DEPONENT

CNIC #: 16102-4396142-4

03455492360

0312 5492360

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No.____/2020

Mst. Tahira Naz **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Tahira Naz D/O Afzal Khan, Ex-SST (Gen),
R/O Village Mughal Banda, P.O Saro Shah,
Tehsil Takhbhai, District Mardan

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt:



Appellant

Through


Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan
Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: ³10.04.2020

Serial No. 23231

ANNEX "B" (11)

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
TRANSCRIPT



DMC No. 191850 Roll No. BK694213
 Name TAHIRA NAZ Registration No. 07NMN2063
 Father's Name AFZAL KHAN Enrollment Semester AUT-2016
 Address C/O FIRDOUS KHAN MOH; RAWANI VPO TAKAR Final Semester AUT-2017
 Tehsil TAKHAT BHAI
 District MARDAN

has successfully completed MASTER OF EDUCATION (M.ED One Year)
The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 16	0831	FOUNDATIONS OF EDUCATION	100	61
AUT- 16	0838	CURRICULUM DEVELOPMENT & INSTRUCTIONS	100	61
AUT- 16	0840	EDUCATIONAL PSYCHOLOGY	100	65
AUT- 16	6505	ISLAMIC SYSTEM OF EDUCATION	100	60
AUT- 16	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	59
PR- 17	0826	ELEMENTARY EDUCATION	100	60
PR- 17	0827	SECONDARY EDUCATION	100	69
PR- 17	0828	HIGHER EDUCATION	100	65
PR- 17	0829	TEACHER EDUCATION IN PAKISTAN	100	69
PR- 17	6552	TEXTBOOK DEVELOPMENT-I	100	63
PR- 17	6553	TEXTBOOK DEVELOPMENT-II	100	65
UT- 17	0837	EDUCATIONAL RESEARCH	100	58

Major Area TEACHER EDUCATION

Total Credit Hours 36

Result Declared on OCTOBER 04, 2018

Date of Issue OCTOBER 12, 2018

Total Marks/Obtained 1200 / 755

Percentage/Grade 63 / B

ATTESTED

Controller of Examinations

Disclaimer: This transcript is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the record of the university student.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD

12



Serial No. 334818

Name: TAHIRA NAZ
 Father's Name: AFZAL KHAN
 Address: C/O UMAR PUBLIC SCHOOL, P/O SARD SHAH
 Tehsil: TAKHAT BHAI
 District: MARDAN

Roll No. AE613385
 Registration No. 07NMN2063
 Final Semester: AUT- 2010

12

has successfully completed BACHELOR OF EDUCATION (B. ED)

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 09	0513	SCHOOL ORGANIZATION	100	67
AUT- 09	0514	EVALUATION, GUIDANCE & RESEARCH	100	61
AUT- 09	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	67
SPR- 10	0651	ENGLISH (COMPULSORY)	100	55
SPR- 10	0517	TEACHING OF PAKISTAN STUDIES	100	65
SPR- 10	0654	TEACHING OF ISLAMIAT	100	58
AUT- 10	0512	PERSPECTIVES OF EDUCATION	100	70
AUT- 10	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	62
AUT- 10	0655	WORKSHOP & TEACHING PRACTICE	100	77

CREDITS: 6

Total Marks / Obtained: 900 / 582

Result Declared on: JULY 18, 2011

65 B

Date of issue: JULY 29, 2011

Percentage / Grade

ATTESTED

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 188967

PROVISIONAL RESULT CARD

Name: TAHIRA NAZ
 Father's Name: AFZAL KHAN
 Address: C/O AFZAL KHAN UMAR PUBLIC
 SCHOOL SARO SHAH F/O SARO SHAH
 Tehsil: TAKHAT BHAF
 District: MARDAN

Roll No: Z547573
 Registration No. 07NMMH2063
 Final Semester: AUT- 2008

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 07	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	66
AUT- 07	0613	PRINCIPLES OF EDUCATION	100	66
AUT- 07	0614	EDUCATIONAL PSYCHOLOGY	100	63
AUT- 07	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	63
SPR- 08	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	78
SPR- 08	0617	TEACHING OF URDU	100	67
SPR- 08	0618	TEACHING OF MATHEMATICS	100	69
SPR- 08	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	65
AUT- 08	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	54

CREDITS: 5

Total Marks / Obtained: 500 / 591

Result Declared on: JULY 20, 2009

Percentage / Grade: 68.2 / B

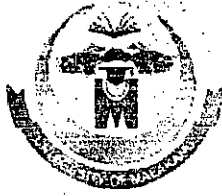
Date of issue: AUGUST 05, 2009

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

ATTESTED Controller of Examinations

14



University of Malakand

Detailed Marks Sheet

Registration No. 2006780130
Roll No. 11623
Name TAHIRA NAZ
Father Name AFZAL KHAN
Examination/Part M.A (URDU) FINAL COMPART
College/District Private Candidate Malakand Agency

Subject Name	Obtained Marks	Status
HAZAM	52	PASSED
QASIDA, MASNAVI, MARSIA	43	PASSED
IQBALIAT	40	PASSED
CRITICISM	54	PASSED
ESSAY, AND MASS CUMMUNICATION	45	PASSED
VIVA VOCE	53	PASSED
PREVIOUS MARKS	239	PASSED
Total Result	526	

You can use print-out of this page for Re-checking application and Supplyrentary Examination admission.
Moreover, the original DMC has been posted via Pakistan Post's UMS (Urgent Mail Service) to your postal address.

ATTESTED



UNIVERSITY OF MALAKAND

PAKISTAN

DETAILED MARKS CERTIFICATE

S.No. 11168

15

Name: TAHIRA NAZ

Private Candidates Dir Upper

Father's Name: AFZAL KHAN



Registration No. 2006780130

Roll No. 340464

B.A PART-II ANNUAL EXAMINATION, 2008

Subject Name	Total Marks	Marks Obtained	Remarks
ISLAMIC STUDIES(E)	75	41	PASSED
PASHTO	75	44	PASSED
ENGLISH(C)	75	24	PASSED
PAK. STUDY	40	25	PASSED
BA PART-I MARKS	285	150	PASSED
	550	284	

Subject Passing Percentage: 33 (Theory & Practical Separately), Aggregate Percentage: 36

Examination Held in Jun 23---Jul 24, 2008

Result Declared on 18-Sep-2008



Errors and Omissions are subject to subsequent rectification

Examination was taken as a whole/in parts

Date of Issue: 11-Oct-2008

Prepared by: Amjad Shahzad

Jahangir Ch
Controller of Examinations
University of Malakand

[Signature]
ATTESTED

Annex = "C"

16
16

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01) **One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:**

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** Merit.

(S.No. 02) **Two (2) Posts of Research officers Fodder. In L&DD Deptt:**

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:**

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) **Five (05) Posts of Data Entry Operators.**

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes. **ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

ATTACHED

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04) **One (01) Post of Male Inspector Mines**

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:** NOTE: In case of non- availability of candidates possessing the

provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
5.	Islamiyat	02	Merit Quota
6.	Pak: Study	03	Merit Quota
7.	History-Cum-Civics	02	Merit Quota
8.	Economics	02	Merit Quota
9.	English	02	Merit Quota
10.	Statistics	02	Merit Quota
11.	Maths	02	Merit Quota
12.	Biology	02	Merit Quota
13.	Chemistry	02	Merit Quota
14.	Physics	02	Merit Quota

(S.No. 52) **Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) **Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 54) **Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram , Mansehra , Shangla , Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 55) **Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(S.No. 56) **Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

(S.No. 57) **Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING
DEPARTMENT.

(S.No. 58) **Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.**

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 59) **Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Inisture.**

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

Bachelor's Degree in Engineering/ Associate Member Institute of Engineering in the relevant subject from a recognized University / Institution with Seven years teaching/ professional experience in the relevant subject as such.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.
ALLOCATION: Merit.

(S.No. 60) **Twenty Two (22) Posts of Male Instructor/Lecturer in Commerce for Govt: College of Commerce/Govt: Commercial training Institute.**

QUALIFICATION: 2nd Class Master Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
05	04	04	04	03	02

(S.No. 61) **Three (03) Posts of Male Instructor/Lecturer in Commerce for Earthquake Affected Areas for Govt: College of Commerce/Govt: Commercial training Institute.**

QUALIFICATION: 2nd Class Master Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: Merit. (District Wise Distribution)

Battagram	Shangla	Kohistan
01	01	01

(S.No. 62) **Fourteen (14) Posts of Male Instructor/ Lecturer of computer Science for Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

QUALIFICATION: (i) 2nd Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
04	02	02	02	02	02

(S.No. 63) **One (01) Post of Male Instructor/ Lecturer of computer Science (Disable) for Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

QUALIFICATION: (i) 2nd Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 64) **One (01) Post of Female Instructor Commerce. In GCC/GCTIs.**

QUALIFICATION: 2nd Class Master's Degree in the relevant Subjects or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Female.

ALLOCATION: Zone-5

ATTESTED

(S.No. 65) **One (01) Post of Male Instructor/ Lecturer of computer Science Earth quack Affected Area in Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

QUALIFICATION: (i) 2nd Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 66) Ten (10) Posts of Male office Assistant.**QUALIFICATION:** Bachelor degree from recognized University.**AGE LIMIT:** 18 to 30 years. **PAY SCALE:** BPS-14. **ELIGIBILITY:** Male.**ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
02	02	02	02	02

(S.No. 67) One (01) Post of Female office Assistant.**QUALIFICATION:** Bachelor degree from recognized University.**AGE LIMIT:** 18 to 30 years. **PAY SCALE:** BPS-14. **ELIGIBILITY:** Female.**ALLOCATION:** Merit.**CORRIGENDUM**

1. The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
2. The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED

- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
- Written Test in the Subject.
 - General Knowledge or Psychological General Ability Test.
 - Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra.
- Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

ATTESTED

(Atta Ur Rehman)

Secretary

NWFP Public Service Commission
2-Fort Road Peshawar Cantt: Ph: 9212962

Appointment Order No. 11 SST (G) FATA

09

Annex = 1
22/12



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@yahoo.com

Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST General) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his Services placed at the disposal of Director Education FATA for further posting against vacant SST Genral posts:-

S. #	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1.	Naheed Akhtar	Musafar Khan	Khyber Agency	1	Hayatabad Phase-IV Tehsil & District: Peshawar	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
2.	Nazakat Bibi	Syed Ali Shah	Mohmand Agency	1	Vill: Mattai Dara P/O Yousaf Khel Mohmand Agency	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
3.	Tahira Naz	Afzal Khan	Mohmand Agency	1	Mughal Banda P/O, Saro Shah Tehsil Takhi Bhai District Mardan	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
4.	Sabiha	Mian Gul Jan	Mohmand Agency	1	Khur Abad, Sahib Gul Mahal P/O Dakki Teshil tangi District Charsadda	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.

Terms and conditions:-

1. Her services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. She will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, she is already in Government service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of

ATTESTED



1. Pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of contributory provident fund allowed to her under new appointment.
2. Her services are liable to termination on one months notice from either side. In case of resignation with out notice her one-month pay/allowances shall be forfeited to the Government.
3. She should join her post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification her appointment will expire automatically and no subsequent appeal etc shall be entertained.
4. She would be on probation for a period of one year extendable for another one year.
5. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
6. Her Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
7. Charge report should be submitted to all concerned
8. The DEO (F) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
9. The DEO(F) concerned will verify their documents before release of pay.
10. Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
11. No TA/DA will be allowed to the appointee for joining his duty.

(Muhammad Rafiq Khattak)

Director

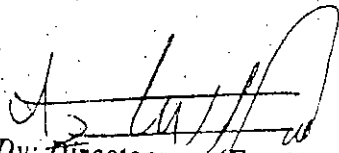
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

2816-23

Endst: No. /File No.2/A-14/SST(F) Gen/PSC/Apptt: Dated Peshawar the 25-6-2012

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
 3. Director of Education FATA Warsak road Peshawar.
 4. All Agency Accounts Officers in FATA.
 5. Official Concerned
 6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 8. M/File

ATTESTED


Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

MEDICAL CERTIFICATE

24



Name of Official TAHIRA NAZ

Caste or race MOHAMMAD

Father's name AZAL KHAN

Residence VILLAGE Mughal Banda P O SARO SHAH
DIST and Teh mardan

Date of birth 25-03-1978

Exact height by measurement 5-6"

Personal mark of identification NIL

Signature of the Official

Signature of head office

Seal of Office

I do hereby certify that I have examined Mr. TAHIR NAZ candidate for
 employment in the Office of the Education Deptt S.S.T (GEN) (16)
 and can not discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except NIL

I do not consider this as disqualification for employment in the office of the

His age according to his own statement 35 year and by
 appearance about thirty five years.

[Signature]
 Medical Superintendent
 Standing Medical Officer
 Police Service Hospital

Civil Hospital

[Signature]
 Agency Evaluation Officer
 North Waziristan Agency

[Signature] 16/5/2012
 Standing Medical Board
 Police Service Hospital
 Peshawar
 LEFT HAND THUMB AND FINGER

IMPRESSION

ATTESTED

[Signature]
 Secretary
 Standing Medical Board
 Police Service Hospital
 Peshawar



Annex "E"

25

FATA SECRETARIAT
DIRECTORATE OF EDUCATION

WAKSAL AGAD PESHAWAR, PAKISTAN
PHONE: 091 5210165 FAX: 091-9210216

NO. 11275/SET/GENERAL/1012 DATED

ADJUSTMENT

Consequent upon their appointment as SST (General) in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 2816-23/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 25-6-2012, the following SST's are hereby adjusted in the schools noted against each with immediate effect: -

S/#	Name/Father's Name/Domicile/Address	Posted at	Remarks
1	Nuheed Akhtar D/O Musafar Khan (Khyber) Hayatabad Phase-IV Tehsil & District: Peshawar	GGMS Musa Khan Killi Khyber Agency	Against vacant post
2	Nazakat Bibi D/O Syed Ali Shah (Mohmand) Vill: Mattai Dara P/O Yousaf Khel Mohmand Agency	GGHS Shahlam Salai Mohmand Agency	-do-
3	Tahira Naz D/O Afzal Khan (Mohmand) Mughal Banda P/O. Saro Shah Tehsil Takht Bhai District Mardan	GGMS Janatmir Kot Mohmand Agency	-do- ✓
4	Sabiha D/O Mian Gul Jan (Mohmand) Khur Abad Sahib Gul Mahal P/O Dakki Teshil tangi District Charsadda	GGMS Gulab Kot Mohmand Agency	-do-

Note: -

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. However the Agency Education Officer concerned will verify their documents before release of pay.

(FAZLI MANAN)

DIRECTOR EDUCATION (FATA)

Endst: No. 4132-37 /A-1/Gen Apptt: of SST (F) (PSC) 2012 Dated Pesh: the 31-7- 2012

Copy forwarded to the: -

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar w/r to his Notification cited above.
- 2 Agency Education Officer Concerned.
- 3 Agency Account Officer Concerned.
- 4 Headmistress Concerned
- 5 Candidate Concerned
- 6 P.A to Director Education FATA

APPROVED
[Signature]



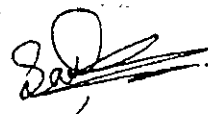
چارچہ رپورٹ

میں مسماہ طاہرہ ناز S.S.T جنرل نے گورنمنٹ مڈل سکول
ہفت میر کوٹشا نارکو ڈیرستان میں بحوالہ 8-2012-اے کو لید

از دوپہر اے عمدہ کا خارج ہنسالی

جوئے مانا ڈسٹرکٹ نورپ ڈیف انچوگس ورسٹ روڈ لٹاوریوال نمبر 37-32-4132

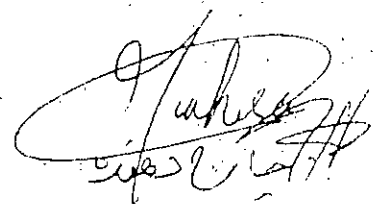
بحوالہ 7-31 سے جاری ہوا
2012



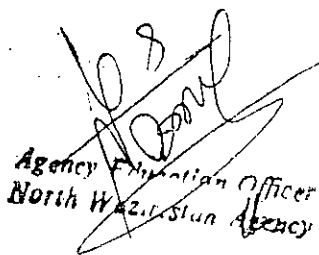
چارچہ لکھنے

سلیٹی GMS جنرل میر کوٹشا
نارکو ڈیرستان ایف ای

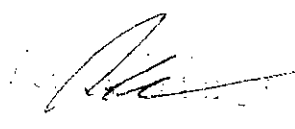
Attested



چارچہ لکھنے
S.S.T
میر


Agency Identification Officer
North Waziristan Agency


ATTESTED





Hhnes e = F"

PESHAWAR HIGH COURT, PESHAWAR

27

FORM OF ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge.
1	2
17.09.2019	<p><u>Writ Petition No.3624-P/2019</u></p> <p>Present: Mr. Khalid Khan, Advocate, for the petitioner.</p> <p>*****</p> <p>Call for the comments of respondents No.3 & 4 so as to reach this Court within a fortnight. Adjourned to a date in office.</p> <p> SENIOR PUISNE JUDGE</p> <p> JUDGE</p>

ATTESTED



(Fayaz)

(D.B) Justice Qaiser Rashid Khan & Justice Muhammad Naeem Anwar

PESHAWAR HIGH COURT, PESHAWAR

28

ORDER SHEET

Date of order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary.
2.	3.
16.01.2020	<p><u>WP No.3624-P/2019 with I.R.</u></p> <p><u>Present:</u> Clerk of counsel for the petitioner.</p> <p>*****</p> <p>A final opportunity is afforded to respondents No.3 & 4, to file the requisite comments to the writ petition without fail within a fortnight.</p> <p> Senior Puisne Judge</p> <p> Judge</p>

ATTESTED

Dist. Govt. NWFP-Provincial
District Accounts Office Swabi
Monthly Salary Statement (January-2019)

2019
 جنوری



29

Personal Information of Mr TAHIRA NAZ d/w/s of MUHAMMAD UMAR KHAN

Personnel Number: 00745048 CNIC: 1610243961424 NTN:
 Date of Birth: 25.03.1978 Entry into Govt. Service: 25.06.2015 Length of Service: 03 Years 07 Months 008 Days

Employment Category: Active Permanent

Designation: Senior English Teacher 80004646-DISTRICT GOVERNMENT KHYBE

DDO Code: SU6180-Head Mistress GGHS Parmoli Swabi

Payroll Section: 003

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance: 57,482.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 16

Pay Stage: 6

Wage type		Amount	Wage type		Amount
0001	Basic Pay	28,030.00	1000	House Rent Allowance	2,727.00
1210	Convey Allowance 2005	5,000.00	1974	Medical Allowance 2011	1,500.00
2148	15% Adhoc Relief All-2013	773.00	2199	Adhoc Relief Allow @10%	400.00
2211	Adhoc Relief All 2016 10%	2,100.00	2224	Adhoc Relief All 2017 10%	2,803.00
2247	Adhoc Relief All 2018 10%	2,803.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs3340	-3,340.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-50.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-1,089.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	75,000.00	-5,000.00	60,000.00

Deductions - Income Tax

Payable: 1,000.00 Recovered till January-2019: 350.00 Exempted: 400.00 Recoverable: 250.00

Gross Pay (Rs.): 46,136.00 Deductions: (Rs.): -10,429.00 Net Pay: (Rs.): 35,707.00

Payee Name: TAHIRA NAZ

Account Number: 79012015

Bank Details: HABIB BANK LIMITED, 220472 TAKHT BAI, MARDAN. TAKHT BAI, MARDAN., MARDAN

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: SWABI

Domicile: -

Temp. Address:

Housing Status: No Official

City:

Email:

ATTESTED

Government of Khyber Pakhtunkhwa
District Accounts Office Swabi
Monthly Salary Statement (September-2015)

2015



30

Personal Information of Mr TAHIRA NAZ d/w/s of MUHAMMAD UMAR KHAN

Personnel Number: 00745048 CNIC: 1610243961424 NTN:
Date of Birth: 25.03.1978 Entry into Govt. Service: 25.06.2015 Length of Service: 00 Years 03 Months 007 Days

Employment Category: Active Permanent

Designation: Senior English Teacher 80004646-SCHOOLS AND LITERACY DEPA

DDO Code: SU7160-Head Mistress GGHS Parmoli Swabi

Payroll Section: 003 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: Yes GPF Balance: 3,520.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2015 Pay Scale Type: Civil BPS: 16 Pay Stage: 0

Wage type		Amount	Wage type		Amount
0001	Basic Pay	12,910.00	1000	House Rent Allowance	1,818.00
1948	Adhoc Allowance 2010@ 50%	3,030.00	1974	Medical Allowance 2011	1,500.00
2148	15% Adhoc Relief All-2013	2,320.00	2174	Adhoc Relief Allow-2014	1,160.00
2199	Adhoc Relief Allow @10%	1,291.00	5002	Adjustment House Rent	1,818.00
5012	Adjustment Medical All	1,500.00	5309	Adj. 15% Adhoc Allowance	2,320.00
5801	Adj Basic Pay	12,910.00	5898	Adj. Adhoc Allowance 50%	3,030.00
5950	Adj:Adhoc Relief All-2014	1,160.00	5964	Adj Adhoc Relief All 2015	1,291.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs1760	-1,760.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 0.00 Recovered till September-2015: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 48,058.00 Deductions: (Rs.): -1,760.00 Net Pay: (Rs.): 46,298.00

Payee Name: TAHIRA NAZ

Account Number:

Bank Details: , ,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: SWABI

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: tahiranzst@gmail.com

ATTESTED

The D.E.O (F.)
Swabi.

Subject: Release of Pay and Appeal

31

Dear Madam,

With due request I beg to say that I am serving in Distt. Swabi at G.G.H.S Parmoli as SST Teacher since 2015 and was drawing his pay regularly. I am performing my duty with honesty and punctuality but you have ~~stop~~ stopped my pay without any reason by the saying of our poor people.

Then you have sent a change for release of pay to D.A.O Swabi but the Accounts office refused to start my salary. Therefore I appeal you to start my pay due to my regular duty.

I shall be thankful to you.

Tahira
Yours Sincerely,

Mst. Tahira Noz SST
G.G.H.S PARMOLI
SWABI.

ATTESTED



Director of Education (E&S)

K.P.K. PESHAWAR

Subject: Appeal for pay release.

Dear Sir,

With humble request that my pay has been stopped by orally telling of D.E.O (F) Swabi without any reason.

Then after my request to D.E.O (F) Swabi, she send a change for release of pay to D.A.O Swabi but D.A.O Swabi refused to start my pay.

Dear Sir, D.D.O start the salary and D.D.O not willing. why? It is justice. It is my right.

Dear Sir who is D.A.O? D.A.O will be worked with the change of D.D.O.

Therefore my pay may kindly be released otherwise

ATTACHED

I shall knock the door of H.Court for his right. *(Signature)*

... .. Tahira Noor SST

(33)



To the DIST. Accounts officer
Swabi
Pay release

Due to my stopping of pay by
order of DEO(F) Swabi I request
you to release my pay accordingly.

DHO(F) Change for releasing

I am working with honesty in
school and punctual in duty
performance.

Therefore my pay may please be
released and oblige.

Yours Obediently,
Mst. Tahira Naz SET
GHS PARNOLI SWABI.

ATTACHED



34

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

(Office phone & Fax No 0938280339, emisfswabi@yahoo.com)

No: 1916 /DA-II/Pay Activation

Dated: 9/4 /2019

To,

District Accounts Officer

Swabi.

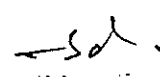
Subject: PAY ACTIVATION.

Memo,

The pay of Miss Tahir Naz SST GGHS Parmoli was stopped by this office due to some allegations.

Inquiry is in progress to probe into the matter, but as the salary is the basic right of an employee against the work he or she do for Government in the best interest of Public Service and she is doing her duties regularly at school.

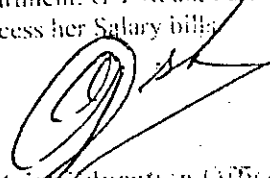
It is therefore the pay in Respect of Tahira Naz, SST, GGHS Parmoli may be activated immediately.


District Education Officer
Female Swabi

Endst No: /

Copy of the above is forwarded to the:-

1. PA to Director, Elementary & Secondary Education Department, G T Road, Peshawar.
2. Head Mistresses GGHS Parmoli with the direction to process her Salary bill.


District Education Officer
Female Swabi


ATTESTED



Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar

Annex = G

35

No. _____ /A-17/Complaint/Tahira Naz/Swabi

Dated Peshawar the 7 / 2019

SHOW CAUSE NOTICE

I, Hafiz Muhammad Ibrahim, Director Elementary & Secondary Education Khyber Pakhtunkhwa as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 do hereby serve upon you Mrst. Tahira Naz D/o Afzal Khan resident of Mughal Banda Tehsil Takht Bhai, Distt. Mardan this show cause notice as follows:

- That consequent upon the report of DEO (F) District Swabi vide No.1282 dated 28.02.2019 you have been found to have appointed yourself fraudulently and bogusly as SST (G) and have so far been able to station yourself at GGHS Parmoll District Swabi which is a gross violation of law of the land.
- That consequent upon the above report of the DEO (F) Swabi, a formal inquiry was launched against you by the Inquiry Officer Mr. Siraj Muhammad DEO (M) Malakand vide this Directorate Notification No.3089 dated 18.06.2019.
- That the Inquiry Officer in his report dated 18.07.2019 has proved your appointment as SST (G) as bogus and fake.
- That by virtue of this bogus and fake appointment you have fraudulently drawn salaries and have inflicted heavy losses onto the Public/Government Treasury since 25.06.2012.

- After going through the findings and recommendations of the Inquiry Officer, the materials on record and other connected papers including your non-attendance before the inquiry officer, I am satisfied that you have committed crime and have grossly violated the law of land and, therefore, you have rendered yourself liable to be proceeded under PPC 419 & 420.
- As a result, thereof, I as the Competent Authority have tentatively decided to hand you over to the law enforcement agency for the crime you committed as mentioned above and recovery of the losses you inflicted on Government Treasury.
- You are, therefore, required to show cause as to why the aforementioned action should not be taken against you and also intimate whether you desire to be heard in person.
- If no reply to this effect is received within 15 days of its issuance, it shall be presumed that you have no defense to put in and in that case Ex-Parte action shall be taken against you.

(Dr. Hafiz Muhammad Ibrahim)
Competent Authority

Director E&SE Khyber Pakhtunkhwa, Peshawar

End of Even No. & Date

2/10/19

Copy of the above is forwarded for information to the:-

- PS to Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- District Education Officer (F) Swabi.
- Principal/Headmistress GGHS Parmoll District Swabi.
- Mrst. Tahira Naz D/o Afzal Khan resident of Mughal Banda, Tehsil Takht Bhai, District Mardan.
- DD Litigation Local Office.
- Abdur Rashid PSHT GPS Central Agra District Malakand.
- Office Copy.

ATTESTED

(Dr. Hafiz Muhammad Ibrahim)
Competent Authority

Director E&SE Khyber Pakhtunkhwa, Peshawar

Mrs. Tahira Naz D/o Afzal Khan resident of Mughal Banda, Tehsil Takht Bhai, District Mardan.



بکھنور جناب ڈائریکٹر ایلیمنٹری اینڈ سکینڈری ایجوکیشن، خیبر پختونخوا پشاور

عنوان: تعیل / جوابدہی برائے شوکاز نوٹس Endst No. 5286-90-A-17 از ظاہرہ ناز صوابی بمورخہ 02-10-2019

36

جناب عالی! درخواست حسب ذیل عرض ہے:

- (1) یہ من سالکہ کی کارکردگی کی وجہ سے DEO(F) صوابی نے من سالکہ کو گورنمنٹ گرلز ہائی سکول پر مولی کا انچارج اور DDO بنایا۔ (آرڈر نمبر 3124 بمورخہ 16-11-2015 درخواست لہذا کے ساتھ لف ہے)۔
- (2) تین مڈل سکولوں اور 12 پرائمری سکولوں کا کلکٹر انچارج بنایا۔ (آرڈر نمبر 4853 بمورخہ 02-11-2017 درخواست لہذا کے ساتھ لف ہے)۔
- (3) من سالکہ کو گورنمنٹ گرلز ہائی سکول پر مولی کے پی ٹی سی کمیٹی کا سیکرٹری بنایا۔ (آرڈر نمبر 31477 بمورخہ 08-11-2015 کی فوٹو کاپی درخواست لہذا کے ساتھ منسلک ہے)۔
- (4) من سالکہ سے پہلے میٹرک کے سالانہ نتائج کا رزلٹ از سن 2013-14 میں 45.71 فیصد اور سب سے زیادہ نمبرات 600/1100 اور بالترتیب 700/1100 حاصل کئے گئے۔ جبکہ من سالکہ کے ڈرائیو میں 2016-17 کے سالانہ امتحانات میں میٹرک کے نتائج 45.71 فیصد سے بڑھ کر 89 فیصد اور 2017ء میں 79 فیصد رہے۔ جبکہ نمبرات کی مد میں 923/1100 اور بالترتیب 893/1100 آگئے۔ جبکہ من سالکہ کو بمورخہ 18 اکتوبر 2018ء کو انچارج شپ سے ہٹایا گیا۔ من سالکہ کو مطلوبہ عہدے سے ہٹانے کے بعد 2019ء میں جماعت نہم کا سالانہ نتائج میں صرف ایک طالبہ پاس ہوئی۔ جبکہ میٹرک کے نتائج بھی بہت ہی خراب رہے۔
- (5) DEO (F) صوابی نے ٹیچر حاضر کو یقینی بنانے سمیت کارپول پشمنٹ سے متعلق حکمانہ جاری کیا۔ (آرڈر نمبر 4559 بمورخہ 14-12-2016 درخواست لہذا کے ساتھ لف ہے)۔
- (6) گورنمنٹ ہائی سکول پر مولی میں آئی ٹی ٹیچر مس شاکرہ نے جماعت ہفتم کی ایک طالبہ رشنا کو سخت جسمانی سزا دی۔ وہ تین دن تک سکول نہیں آئی۔ رشنا کی ماں سکول آئی اور شوہر کا شناختی کارڈ کے ساتھ تحریری شکایت درج کی۔ درخواست بمعہ ہیڈ مسٹریس رپورٹ DEO (F) صوابی کو ارسال کی گئی لیکن DEO (F) صوابی نے اس ضمن میں کوئی بھی ایکشن نہیں لیا۔ کیونکہ آئی ٹی ٹیچر ASDEO(F) مس فرزانہ کی من پسند اور لاڈلی ٹیچر ہیں۔ اس ضمن میں من سالکہ کو دھمکیاں بھی دیں گئیں کہ رپورٹ واپس لے لی جائے بصورت دیگر آپ کو کئی انکوآریز کا سامنا کرنا پڑگا۔ مس فرزانہ کی آڑ میں DEO(F) صوابی نے بھی مذکورہ رپورٹ پر چشم پوشی کی اور من سالکہ کو یکے بعد دیگرے کئی انکوآریز کا سامنا کرنا پڑا۔ (Report Endst No. 226-1 بمورخہ 13-09-2018 کی کاپی درخواست لہذا کے ساتھ لف ہے)۔
- (7) از سن 2015ء تا 2018ء تک ٹیچر کو بطور اچھی ٹیچر ایوارڈ سے بھی نوازا گیا۔ ASDEO (F) صوابی مس فرزانہ بمعہ DEF(F) صوابی اس ٹیچر کو یہ ایوارڈ دیتی جو آدھی رقم مس فرزانہ کو بطور رشوت واپس کرتی۔ من سالکہ کو بھی اس ضمن میں رشوت دینے کی پیشکش کی گئی تھی جس کی زندہ جاوید مثال سابقہ ڈپٹی ڈائریکٹر منظر جان صاحب کی بہن شاہ نشین SST (G) بھی ہیں جو کہ گورنمنٹ گرلز ہائیئر سکینڈری سکول ادینہ میں انچارج تھی۔

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(8) من ساکنہ پر بے جا انکوائریاں لگائیں گئیں اور من ساکنہ کو DDO اور انچارج شپ کے عہدے سے ہٹایا گیا۔ اور مس پروین جو کہ جنوری 2018ء میں C.T سے SST پر پروموٹ ہو کر گورنمنٹ گرلز ہائی سکول پر مولیٰ آئیں تھیں۔ جو سرکاری نوٹیفیکیشن کی خلاف ورزی تھی کہ ہیڈ مسٹریس کی غیر موجودگی میں سینئر ٹیچر کو انچارج بنائیں گے۔ (آرڈر نمبر 3693 بمورخہ 08-10-2018 درخواست لہذا کے ساتھ لف ہے)۔

(9) ہیڈ مسٹریس گورنمنٹ گرلز ہائی سکول ترکئی میں مس شکیل کو DDO پر مولیٰ بنایا گیا۔ (لیٹر نمبر 3693 بمورخہ 08-10-2018 درخواست لہذا کے ساتھ لف ہے)۔

(10) بمورخہ 18 دسمبر 2018ء کو گورنمنٹ گرلز ہائی سکول پر مولیٰ کی وزٹ پر (F) DEO صوابی ریجانہ یاسمین آئی اور من ساکنہ کی بے عزتی کرتے ہوئے نازیبا الفاظ استعمال کئے۔ جس سے من ساکنہ کی عزت نفس مجروح کرنے سمیت من ساکنہ کو سنگین نتائج کی دھمکیاں دیتے ہوئے من ساکنہ کو جیل میں ڈالنے اور مزید انکوائریز کے سامنا کرنے کا کہا۔ اور مزید کہا کہ نصرت شاہین ہیڈ مسٹریس گورنمنٹ گرلز ہائی سکول پر مولیٰ کو تنگ نہ کیا جائے۔ وہ کچھ بھی کرے آپ اس سلسلے میں کوئی بھی شکایت نہیں کریں گی۔ نصرت شاہین ہیڈ مسٹریس ہری پور سے تعلق رکھتی ہیں اور ریجانہ یاسمین کا تعلق بھی ہری پور سے ہی ہے۔ اور دونوں کے مابین گہری دوستی ہے اور اپنی دوستی کو نبھانے کے لئے ایجوکیشن کا پلیٹ فارم استعمال کر رہی ہیں۔ دونوں کی دوستی کی وجہ سے اقربا پروری کے ریکارڈ ٹوٹ گئے اور سکول کے آرڈر بک سے دو آرڈر بھی بابوشاہ حسن کے ذریعے پھاڑ دیئے گئے۔ (پھاڑے گئے آرڈر کی کاپیاں لف ہیں)۔

(11) من ساکنہ گورنمنٹ گرلز ہائی سکول پر مولیٰ میں موجود تھیں کہ ہیڈ مسٹریس نصرت شاہین کی غیر حاضر دنوں میں جو کہ مندرجہ ذیل ہیں میں حاضر یاں DEO(F) کی ایما پر لگوائیں اور اس کے سامنے شاہ حسن نے جعلی دستخط کئے گئے:

1-	مورخہ 26-10-2018	تا	6 نومبر 2018	(12 دن غیر حاضری)
2-	مورخہ 06-11-2018	تا	09/11/2018	(3 دن غیر حاضری)
3-	2018-11-2018	تا	24-11-2018	(6 دن غیر حاضری)
4-	2018-11-2018، 24-11-2018، 26-11-2018، 28-11-2018، 30-11-2018			(4 دن غیر حاضری)
5-	2018		14، 11، 10، 8، 7، 5، 3	(8 دن غیر حاضری)
6-	24-01-2019	تا	30-01-2019	(7 دن غیر حاضری)
7-	10-01-2019	تا	18، 17-01-2019	(4 دن غیر حاضری)
			کل غیر حاضریاں	44 دن

(12) نو ماہی امتحان 2018ء میں 552 طالبات سے 50 روپے فی طالبہ وصول کئے گئے جو 27600 روپے بنتے تھے اور سالانہ امتحانات کے لئے امتحانی فنڈ 59000 روپے کے حساب سے 19550 روپے وصول کئے۔ اور امتحانات کے لئے امتحانی فنڈ 50000 بھی نکالے گئے۔ 27000 روپے کی پرانی کتابیں فروخت کیں گئیں اور دوسرے فنڈز سے بھی رقم نکالی گئی۔ یہ سب کچھ سابقہ DEO(F) صوابی ریجانہ یاسمین کی شراکت داری، اقرباء پروری اور اختیارات کے ناجائز استعمال کی وجہ سے ہوا۔ E&D رولز 2011ء کے تحت ان مذکورہ افسران کے خلاف کارروائی کی استدعا ہے اور 44 دن کی غیر حاضری کے دستخط کے سلسلے میں PPC 419/420 لاگو ہو سکتا ہے یا نہیں۔ اس کی رپورٹ ڈائریکٹر ایڈسٹری ایٹڈ سکینڈری ایجوکیشن خیبر پختونخوا پشاور کو

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10/08/2019 کو بذریعہ ڈاک رجسٹری نمبر 474/804 پر ارسال کئے ہیں۔ لیکن تاحال اس کے کوئی کارروائی عمل میں نہیں لائی گئی۔ اور تمام ثبوت بھی افسران بالا کو ارسال کئے جا چکے ہیں۔

(13) مس عظمتی (DM) جو گورنمنٹ گرلز مڈل سکول خیشا تحصیل رزڈ (ضلع صوابی) میں NTS پر تعینات تھی اور اس وقت NTS ٹیچر کے ٹرانسفر پر پابندی تھی گورنمنٹ گرلز مڈل سکول خیشا ضلع صوابی سے گورنمنٹ گرلز مڈل سکول شیر دل خان کله ضلع مردان کو بمورنہ 13-08-2018 کو آرڈر نمبر 15-2611 پر ڈائریکٹیو ریٹ سے ہوئیں۔ اور موجودہ DEO(F) صوابی دلشاد بیگم کے دستخط ہیں۔ (کاپی آرڈر درخواست کے ساتھ لف ہیں)۔ کیا یہ اختیارات کے ناجائز استعمال کے زمرے میں نہیں آتے۔

(14) آئی ٹی ٹیچر مس شاکرہ کی ٹرانسفر گورنمنٹ گرلز ہائی سکول پر مولی سے گورنمنٹ گرلز ہائی سکول دو بیان تحصیل رزڈ (ضلع صوابی) کو ہوئی۔ گورنمنٹ گرلز ہائی سکول پر مولی مین دو سال سے مکمل آئی ٹی لیب موجود ہے اور گورنمنٹ گرلز ہائی سکول دو بیان میں نہ پہلے آئی ٹی لیب تھی اور نہ اب ہیں۔ DEO(F) صوابی ریحانہ یاسمین نے گورنمنٹ گرلز ہائی سکول پر مولی اور عوام کے ساتھ اختیارات کا ناجائز استعمال کر کے اقربائی پروری اور بد عنوانی کا ثبوت دیا ہے۔ کیا E&D رولز 2011ء کے تحت کارروائی نہیں ہو سکتی۔ (کاپی درخواست ہذا کے ساتھ لف ہے)۔

(15) مس نگینہ SST (G) گورنمنٹ گرلز ہائی سکول پر مولی میں تعینات تھیں جبکہ ان کا ٹرانسفر کمیونٹی گرلز پرائمری سکول پر مولی کو جنوری 2019ء میں قریبی سکول کو ہوا ہے اور پھر ایک بھاری رشوت کے عوض کینسل ہوا۔ یہ بات اب DEO(F) صوابی ریحانہ یاسمین اور آفس اسسٹنٹ اظہار حسین اچھی طرح جانتے ہیں کہ کتنے رقم وصول کی اور کیوں کینسل ہوئی۔

(16) اظہار حسین سینئر کلرک DEO (F) صوابی میں ڈیوٹی دے رہے ہیں ان کا ٹرانسفر DEO(M) کو بہت عرصہ پہلے ہو چکی ہے لیکن ریحانہ یاسمین، سابقہ DEO(F) نے ان کو کیوں DEO (F) میں رکھا ہوا تھا۔ اور اس کے بعد موجودہ DEO (F) نے بھی ان کو رکھا ہوا ہے یہ کام بارگین کرنے کے لئے کیا گیا تھا۔

(17) اور اب منسٹریل سٹاف ٹرانسفر آرڈر میں 31-07-2019ء کو آرڈر نمبر 4109-Fila-A23 کے ذریعے کیا گیا۔ پھر اس آرڈر کو 29-08-2019 کو Withdraw کیا گیا۔ اور اظہار حسین آفس DEO (F) صوابی میں ڈیوٹی سرانجام دے رہے ہیں اور متعلقہ سکول گورنمنٹ گرلز ہائی سکول ادینہ میں چارج نہیں لیتے۔ حالانکہ مشیر تعلیم اور ڈائریکٹر کا واضح حکمنامہ یہ ہے کہ تمام منسٹریل سٹاف کا تبادلہ ضروری ہے۔ کیا DEO (F) صوابی اختیارات کا ناجائز استعمال، ذاتی مفاد اور اقربا پروری کے زمرے میں نہیں آتی۔ اس کے خلاف E&D رولز 2011ء کے تحت کارروائی نہیں ہو سکتی؟ سرکاری احکامات کی کھلی خلاف ورزی نہیں ہے۔ قانون کا اطلاق صرف کمزور لوگوں پر ہوتا ہے۔

(18) سرکاری گاڑی کو مجاز افسر ڈیوٹی کے اوقات کار کے بعد سرکاری دفتر میں کھڑی کرنا قانون کے مطابق ہے؟ سابقہ DEO (F) صوابی ریحانہ یاسمین نے روزانہ شاہ منصور صوابی سے ضلع ہری پوری کے TT کالونی تک خود ڈرائیورنگ کر کے چلایا اور اپنی ذاتی کام میں سرکاری گاڑی اور سرکاری تیل خرچ کیا۔ کیا اس کے خلاف حکمانہ کارروائی نہیں ہو سکتی؟

(19) پر مولی سے باہر جمالہ سوپرز ریٹائر ہوئی۔ اس کی جگہ اس کی بیٹی اور بیٹی نے Employee Son Quota میں درخواست دی تھی لیکن اس کی بالکل نئی عورت واحدہ زوجہ سجد الرحمن کو بھرتی کیا گیا۔ جس کے لئے کوئی اشتہار اور دوسرے قانونی تقاضے پورے نہیں کئے گئے۔ اور کیا باہر جمالہ کی حق تلفی نہیں ہوئی؟ DEO (F) صوابی میں سارے کلاس فوری کی بھرتیاں میں بے دریغ نا انصافیاں ہوئیں (کاپی درخواست ہذا کے ساتھ لف ہے)۔

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(20) گورنمنٹ گرلز پرائمری سکول اسماعیلہ میں کلاس فور کی بھرتی 14 دسمبر 2018ء کو ہوئی۔ 3 مارچ 2019ء کو پھر کینسل ہوئی جو DEO (F) ریمانہ یا سمین ایک مکمل میڈیکل ان فٹ شخص کو بھرتی کیا گیا۔ اس آرڈر میں سارے کلاس فورز کے آرڈرز کو چیک کئے جائیں کہ کیا قانونی تقاضوں کو پورے کر کے آرڈر کئے گئے (کاپی درخواست ہذا کے ساتھ لف ہے)۔

(21) اختیارات کے ناجائز استعمال، کرپشن، انفارمیشن، ڈاکومنٹس ریکارڈنگ رسائی کے لئے RTI کمیشن کے ذریعے درخواستیں دیں لیکن تاحال کوئی بھی انفارمیشن نہیں دی گئی۔ جس میں DEO (F) صوابی اور اکاؤنٹ آفس شامل ہیں (کاپی درخواست ہذا کے ساتھ منسلک ہے)۔

(22) مس رفعت SST (G) گورنمنٹ گرلز ہائی سکول پر مولی نے اپنے تبادلے کے درخواست پر انچارج کے بوگس دستخط اور مہر لگوائی۔ DEO (F) صوابی نے مس رحیم پر نپیل گورنمنٹ گرلز ہائی سکول ڈاگئی کے ذریعے انکوائری کرائی۔ دو انکریمنٹ کاٹنے اور سزا دینے کے احکامات صادر ہوئے۔ اس پر ابھی تک مطلوبہ سزا نہیں دی گئی۔ اظہار حسین سینئر کلرک نے چھپا کے رکھا ہے۔ DEO (F) صوابی اقربا پروری، اختیار کے ناجائز استعمال اور چشم پوری کر رہی ہیں۔ F&D رولز 2011ء کے تحت کارروائی کی استدعا ہے۔ (کاپی درخواست ہذا کے ساتھ منسلک ہے)۔

(23) DEO (F) نے من سائلہ پر بے بنیاد، من گھڑت الزام لگایا ہے اور ڈائریکٹر E&SE خیر پختونخوا ایشیا اور شکایت کی ہے کہ مس طاہرہ ناز DEO (F) کو انفارمیشن نہیں کیا۔ تو مس سائرہ SST (G) کی ٹرانسفر کاپی DEO (F) صوابی کو ہوئی۔ جو آرڈر نمبر بمورخہ 02-04-2019 کو ہوئے۔ اور ٹرانسفر کی کاپی نمبر 6-204 بمورخہ 02/04/2019 کو ہوئی۔ یہ اور بات ہے کہ آپ کے اپنے بابو صاحبان نالائق ہوں۔ یا آپ سے چشم پوشی کی ہو۔ جو نمبر کلرک پر مولی کو گورنمنٹ گرلز ہائی سکول پر مولی کو آرڈر بک پر آرڈر کیا گیا تھا کہ کسی بھی سرکاری ملازم کی تمام دستاویزات، آرڈر LPC اور جملہ ڈاکومنٹس کو محکمانہ اور قانونی تقاضوں کو پورا کر کے Pay-Release کریں۔ من سائلہ کے سامنے بابو شاہ حسن نے مس سائرہ سے 5000 روپے لئے کہ DEO (F) صوابی میں خرچہ آتا ہے۔ پیسوں کے بغیر کام نہیں چلتا۔ دوسرے روز آیا کہ مطلوبہ رقم 5000 روپے کم ہیں۔ 3000 روپے اور لے لیے اور بعد ازاں ایک ہزار روپے اور لے لیے۔ یہ بھی معلوم نہیں ہوا کہ 9000 روپے کس کو دیتے ہیں یہ وہی بابو شاہ حسن جو نمبر کلرک ہے جس نے DEO (F) کی ایما پر نصرت شاہین ہیڈ مسٹریس اور DEO (F) کی رشتہ دار کے لئے ان کی غیر حاضری میں حاضریاں لگائی۔ اور DEO (F) صوابی کی ایما پر لگائے۔ یہ وہی شاہ حسن ہے جو 18 دسمبر 2019ء کو DEO (F) صوابی کے گورنمنٹ گرلز ہائی سکول پر مولی کے آرڈر بک سے دو آرڈر پھاڑ دیئے لیکن اس کو معلوم نہ تھا کہ اس کے فوٹو سٹیٹ کاپی مس طاہرہ ناز کے پاس محفوظ ہیں۔ کیا یہ مس نصرت شاہین DEO (F) کے اختیارات کا ناجائز استعمال نہیں ہے۔ E&D رولز 2011 اور 419/420 PPC کے زمر میں نہیں آتا (درخواست ہذا کے ساتھ کاپی لف ہے)۔

(24) DEO (F) صوابی کی دوسری شکایت یہ ہے:

She was again transfer without information to DEO (F) Swabi Endst No. 1143 Dated 22-02-2019

مجھ پر جھوٹا الزام ہے۔ کیونکہ مس سائرہ کو Endst No. 248,01-11-2019 کو Relieve کیا گیا ہے اور اسی ایک ہی تاریخ اور آرڈر نمبر 248 بمورخہ 01/11/2019 کو نصرت شاہین نے بھی Relieve کیا۔ اس میں بھی بڑا بوگس کام موجود ہے کیونکہ مس نصرت شاہین 06 نومبر 2019ء کو پر مولی آئی۔ اور مس سائرہ SST (G) کو مس شکیلہ DDO پر مولی نے بمورخہ 01-11-2019 کو Relieve کیا۔ مس نصرت شاہین نے اس وقت سکول میں چارج نہیں لیا تھا۔ بعد میں بوگس لیٹر

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کے ذریعے Relieve کیا۔ دونوں کے نقول ارسال خدمت ہیں۔ کیا یہاں PPC 419/420 لاگو ہو سکتا ہے۔ E&D رولز 2011ء کے تحت کارروائی عمل لائی جائے۔ (درخواست ہذا کے ساتھ کاپی منسلک ہے)۔

من سالکہ 08-10-2019 اور 10-10-2019 کو آرڈر نمبر 3693 اور آرڈر نمبر 9-3749-3749 DDO اور انچارج پر سے ہٹایا گیا۔ جب اس وقت میں انچارج نہیں تھی۔ DDO نہیں تھی پھر میں نے مس سائرہ کو کیسے Relieve کیا ہے۔ ثبوت موجود ہیں۔ اور ڈائریکٹر صاحب نے مجھ پر رپورٹ بھیجی ہے۔ جو ثبوت کے ساتھ ثابت ہوا کہ جھوٹا ہے اُن پر جھوٹے الزامات اور اختیارات کے ناجائز استعمال اور اقرباء پروری کے تحت E&D رولز 2011ء کے تحت کارروائی کی استدعا ہے۔ PPC 419/420 کی بھی اگر ہو سکے استدعا ہے۔ (کاپی درخواست ہذا کے ساتھ لف ہے)۔

(25) من سالکہ پر یہ الزام ہے اور ڈائریکٹر صاحب کو بھی رپورٹ ارسال کی ہے کہ مس طاہرہ ناز کے پاس PTC ریکارڈ نہیں ہے۔ Endst No. 1061 dated Swabi 20-02-2019 DEO (F) Swabi (کاپی منسلک ہے)۔

مس زبیدہ خاتون پر نپیل گورنمنٹ گرلز ہائی سکول مانیری صوابی، امبرین SST اور ایک اور SS میری PTC ریکارڈ چیک کرنے پر مولیٰ آئیں، ریکارڈ موجود ہے۔ DEO (F) کو رپورٹ دی۔ اور ٹھیک بھی ہے مکمل ہے۔ کیا اس جھوٹے الزام کے تحت E&D رولز 2011ء حرکت میں نہیں آسکتی۔ یہاں اختیارات کا ناجائز استعمال نہیں ہے؟ PTC کی نقل بھی موجود ہے (کاپی مذکورہ درخواست کے ساتھ لف ہے)۔

(26) انچارج شپ برطانی: محکمہ تعلیم کے نوٹیفیکیشن کے مطابق سینئر ترین SST کو انچارج بنانا۔ (کاپی لف ہے)۔ سابقہ DEO (F) صوابی نے مذکورہ نوٹیفیکیشن کی خلاف ورزی کی ہے جس میں سفینہ گل جو NTS کی بھرتی کی ہوئی ہے اس سے سینئر SST، گورنمنٹ گرلز ہائی سکول پر مولیٰ میں موجود ہیں لیکن اس کے باوجود DEO (F) صوابی نے اختیارات کا ناجائز استعمال کیا۔ اقرباء پروری کی، اور سرکاری نوٹیفیکیشن کی خلاف ورزی کی اور سفینہ گل کو گورنمنٹ گرلز ہائی سکول پر مولیٰ کا انچارج بنایا گیا۔ (کاپی درخواست ہذا کے ساتھ لف ہے)۔

(27) جو نیز کلرک شاہ حسن نے سکول کے بجلی کے بل، فنانس، ٹی اے، اے سی، بلوں پر میرے بوجس دستخط کئے ہیں مجھے معلوم نہیں کہ کتنے پیسے نکالے ہیں۔ پلوٹہ C.T کے Change پر بھی میرے بوجس دستخط کئے ہیں۔ طالبات کے وظیفہ فارم Stipend پر میرے دستخط مارچ 2018ء میں کئے۔ اور میں اُس وقت SSC سالانہ امتحان 2018ء کے امتحانی ڈیوٹی میں گورنمنٹ گرلز ہائی سکول مانیری میں تھی۔ اس نے میری غیر موجودگی میں میرے بوجس دستخط کئے مہر لگائی، قانونی کارروائی کی استدعا ہے۔ (بوجس دستخط کی کاپیاں ارسال خدمت ہیں)۔

(28) پشاور ہائی سکول کے فیصلے کے مطابق اختیارات کے ناجائز استعمال پر اخباری بیان منسلک ہے (کاپی خدمت ارسال ہے)۔

(29) DEO (F) صوابی نے میرا نمبر بلاک کیا تھا جس پر میں نے بے انصافیوں کی آواز پہنچانی تھی۔

(30) میں نے ڈائریکٹر E&SE صاحب کو بذریعہ رجسٹری ڈاک شکایت رپورٹ کی ہے لیکن میرے خلاف کارروائی بلا تاخیر ہوتی ہے لیکن میری فریاد اور افسران کی بے انصافیوں کا ازالہ اور محکمانہ کارروائی نہیں ہوتی۔

(31) DEO (F) صوابی ریجانہ یا سمین نے زبانی اور بغیر تحریری لیٹر کے ڈسٹرکٹ اکاؤنٹ آفس صوابی میں میری فروری 2019ء سے تنخواہ بند کی ہے جو سپریم کورٹ کے فیصلے کی توہین ہے۔ (کاپی منسلک ہے)۔

(32) مجھے ضلع صوابی میں پرسنل نمبر 00745048 ملا۔ اور مجھے ضلع صوابی میں 80397975 پوزیشن کو ڈملا۔ میرے تمام کاغذات درست تھے 2015ء سے اب تک مجھے تنخواہ ملتی رہی۔ میرے سارے ڈاکو منٹس DEO (F) صوابی اور LPC کو ڈسٹرکٹ

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اکاؤنٹس آفس صوابی میں سینئر ایڈیٹر لال باچا، اسسٹنٹ اکاؤنٹ آفیسر نعیم حیدر اور ڈسٹرکٹ اکاؤنٹ آفیسر نے ویریفائی کر کے تنخواہ دی۔ Pay Release کیا اور اس میں کوئی خرابی ہوتی تو مذکورہ اکاؤنٹ اہلکاروں اور DEO (F) صوابی نے مجھے کیوں تنخواہ دی۔

سپریم کورٹ آف پاکستان کے مطابق:

"کسی بھی سرکاری ملازم کے کاغذات، میرٹ وغیرہ Joining کے وقت پڑتال کریں۔ اگر ملازم کافی عرصہ کام کر چکا ہو تو محکمہ بوجس بھرتی کا الزام لگا کر ملازم کو نوکری سے نہیں نکال سکتا"۔ (کاپی ارسال خدمت ہے)۔ اس کی ساری ذمہ داری DEO (F) صوابی اور اکاؤنٹ آفس صوابی کی ہے جو 2015ء سے تنخواہیں رہے ہیں اور اب روک رہے ہیں۔

مشیر تعلیم ضیاء اللہ بنگش کے نوٹیفیکیشن کے مطابق کسی بھی مرد حضرات کو زنانہ سکولوں میں داخلہ تقریبات میں شرکت پر پابندی ہے۔ (کاپی منسلک ہے)۔

اب سوال یہ ہے کہ مذکورہ نوٹیفیکیشن کی تعمیل نہیں ہو رہی یا یہ غلط ہے۔ یا مشیر تعلیم مذکورہ نوٹیفیکیشن کا مجاز نہیں۔ یا DEO ملائڈ سراج محمد میل نہیں۔ یا نوٹیفیکیشن کی خلاف ورزی کر رہا ہے۔ بمورخہ 16/07/2019 کو سراج محمد صاحب موسم گرما کی تعطیلات میں صوابی آئے تھے۔ سراج محمد DEO ملائڈ نے مجھے کوئی پیشگی اطلاع نہیں دی۔ اور مجھے صوابی آفس میں دن 11 بجے بلایا۔ میں ایک پردہ نشین خاتون ہوں۔ سراج محمد صاحب نے مجھے DEO ملائڈ آفس بلایا۔ کیا ان کا یہ عمل درست تھا؟ کہ ایک میل آفیسر کسی باپردہ خاتون کو اپنے دفتر اکیلے بلا سکتا؟۔ کیا یہ قرآن، حدیث، فقہ اور مشیر تعلیم کے نوٹیفیکیشن کی خلاف ورزی نہیں تھی؟۔

اس ضمن میں آپ صاحبان سے التماس کی جاتی ہے کہ مذکورہ بالا حقائق و ثبوتوں کو مد نظر رکھتے ہوئے من سائلہ کو ایسے بے بنیاد، گھٹاؤنے الزامات سے بری ذمہ قرار دے کر مشکور فرمائیں۔

نوٹ: من سائلہ ڈاکخانہ سے لیٹر ہذا بمورخہ 10-12-2019 کو ملا تھا۔


العارضة

طاہرہ ناز (SSTG)

گورنمنٹ گرلز ہائی سکول پر مولی، صوابی

مورخہ: 21-10-2019

کاپی برائے اطلاع:

- 1- سیکرٹری ایملنٹری اینڈ سکیڈری ایجوکیشن، خیبر پختونخوا
- 2- ڈائریکٹر ایملنٹری اینڈ سکیڈری ایجوکیشن، خیبر پختونخوا
- 3- DD Litigation، ایملنٹری اینڈ سکیڈری ایجوکیشن، خیبر پختونخوا
- 4- ذاتی کاپی برائے دیگر کارروائی۔

DD No-1405
dtd=20-10-19

ATTESTED



Annex = "H"

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

(42)

NOTIFICATION

1. **WHEREAS**, Mst. TahiraNaz d/o Afzal Khan, resident of Mughal Banda Tehsil Takhtbhai District Mardan was reported by the DEO (F) Swabi as bogus SST (G) and fraudulently working at GGHS Parmoli Swabi vide her report No.1282 dated 28.02.2019.
2. **AND WHEREAS**, a fact-finding inquiry was ordered against the bogus teacher vide Endst: No.8126-28 dated 27.3.2019.
3. **AND WHEREAS**, the inquiry officer Mr. Siraj Muhammad DEO (M) Malakand proved the appointment of Mst. TahiraNaz as SST (G) as bogus vide his report dated 22.7.2019.
4. **AND WHEREAS**, to fulfill the course of natural justice a show cause notice was served upon the referred bogus teacher vide No.5285/a-17/Compliant/TahiraNaz/Swabi dated 02.10.2019.
5. **AND WHEREAS**, she submitted her reply to the show cause on 21-10-2019 which was found unsatisfactory.
6. **AND WHEREAS**, she was granted the opportunity of personal hearing vide No.4611/A-17/Compliant /TahiraNaz/Swabi dated 1-11-19, which she did not avail.
7. **AND WHEREAS**, the competent authority, after having considered the evidence on record, findings of inquiry report, reply to show cause of the bogus teacher and non-availing the opportunity of personal hearing by the bogus teacher, has come to the conclusion that the charges given in the show cause have been proved against Mst. TahiraNaz d/o Afzal Khan and that the notification regarding placement of her services at the disposal of Director of education Fata for further posting issued vide.2816-23/FNo.2/A-14/SST(F)Gen/PSC/APPT Dated 25-06-2012 is found bogus.
8. **NOW THEREFORE**, under the mandatory provisions and powers conferred under the section 16 and 21 of General Clauses Act 1897 as amended in 1956 the Director Elementary & Secondary Education Khyber Pakhtunkhwa as the competent authority is pleased to disown ab initio Mst. TahiraNaz d/o Afzal Khan and declare her as bogus SST (G) GGHS Parmoli District Swabi liable to be proceeded as per PPC 419 & 420 by the law enforcing agencies in the interest of public service.

ATTESTED

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 11061-70 /A-17/SST/Complaint/TahiraNaz/Swabi

Dated Peshawar the 09-12 2019.

Copy forwarded for information and necessary action to the:-

خدمت صاحب والاشراف سیکرٹری آف ایجوکیشن اینڈ سیکلر اڈیوکیٹس

دعا ہے عطا فرمائیں

صاحب عالی!

گزارش بھروسہ الوریہ ہے کہ سائڈ ٹورنٹ گریڈز ہائی سکول

پرنسپل ہورلی میں کینیڈا SSI پیپر میں فراغت منجی انجام دے
میں تھی۔ اور تقریباً سات سال سروس کرنے کے بعد بغیر کسی شواہد کا نوٹس
یا چارٹ شہادت کے بحوالہ 9-12-2018 Disowned کر دی گئی۔

صاحب والا! بغیر کوئی چارٹ بغیر کوئی نوٹس کے ایک ملازم کینیڈا کے نہ شواہد
بغیر ہو سکتی ہے۔ یہ ملازمت سے برطرف ہوئے۔ یہ قانون کی بڑی سنگت
خلاف 12 پر گیا ہے۔ سالانہ آپریشن 2015 کے بعد تمام ریٹائرڈ ہو گئے ہیں۔
اور 2015 سے اس کے ریٹائرڈ رکھیں۔ تو صاحب ظاہر ہو جائے گا۔

کیونکہ سائڈ ریٹائرڈ تو تھا ہمارا سال سکول ختم ہو گیا ہے۔ سائڈ اس سے
میں کھینچ کر لیا گیا۔ کو بار بار سابقہ 2015 ریٹائرڈ ہونے کے خلاف کافی شہادت
پیش کیے۔ مگر ریٹائرڈ ہو جانے سے یہ گروپ منقطع کرتے ہوئے سائڈ
کو ملازمت سے برطرف نہ کی گئی۔ جبکہ 2015 ریٹائرڈ ہو گئے اور آؤٹ

کرنے کی گئی۔ ان فری انصاف ہے؟ کیا یہ قانون ہے؟ کہ یہ سائڈ
کو بغیر کسی نوٹس کے برطرف کیا جائے۔ اور ایک آئینہ لگا کر دھبہ مارا
شواہد کے باوجود آزاد ہو جائے۔ ان فری اس کا یہ قانون کیا ہو گا؟
یہ انصاف پاکستان میں کب لگے گا؟ اور اس پر عمل کب ہو گا؟

آپ سون سے سمجھو اور ان کے خلاف اس کے خلاف ہے۔ کہ سائڈ

ہاں۔ طور پر یہ کہے ہیں صاحب پر دوبارہ تعینات کی جائے۔
سائڈ بے فائدہ ٹھکرے گا اور ان کے مندر میں ہے۔

18/12/2019 حوالہ

سماہ ظاہر ہمارا SSI جنرل
دعا ہے عطا فرمائیں

A.S/E & SE
No. 5739
dated 18-12-2019

ATTESTED

وکالت نامہ

بعدالت شریعہ پشاور سروسز کمپنیز لٹڈ

مسماہ طالبہ ناز نامہ کو رعیت و غیرہ

منجانب Appellant دعویٰ اجرم

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام پشاور کے لئے

امین الرحمن یوسفزئی ایڈووکیٹ ہائی کورٹ فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈووکیٹ ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کرونگا اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر ذمہ دار صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد تالی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا مقررہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا کی علیحدہ مختار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزوی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند ہے مورخہ 2022-6-3 مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED:

Amin ur Rehman Yusufzai
Advocate High Court
&
Federal Shariat Court of Pakistan
CNIC: 17301-5813582-3
Cell No. 0321-9022964
BC-10-7562

Sajjad Ahmad Mehsud
Advocate High Court
Peshawar

Tehira H
طالبہ ناز

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

S.B

No.

Appeal No. 5369 of 20

Mst. Tahira Naz Appellant/Petitioner

Versus

Govt. of KPK Through Secy EDSE Pesh. Respondent

Respondent No. 1

Notice to:

Govt. of KPK Through Secretary Elementary
Secondary Education Peshawar.

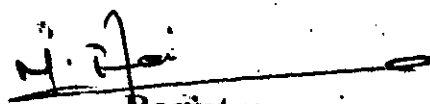
WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 2/11/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 8th

Day of Oct 2020.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

20/11

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

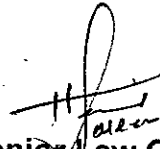
Service Appeal No. 5369/2020

Tahira Naz.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

S.NO.	PARTICULARS	ANNEXURE	PAGE NO
1.	Para-wise Reply of the Respondents		1-2
2.	Affidavit		3
3.	Copy of PSC Advertisement 01/2009 Sr. No 55	"A"	4
4.	Copy of PSC Merit List	"B"	5-25
5.	Copy of Authority Letter		26


Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission
Peshawar

UMS88950296

Date: 30/11/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 5369/2020

Tahira Naz.....Appellant

VERSUSGovernment of Khyber Pakhtunkhwa & others.....**Respondents****PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)****PRELIMINARY OBJECTIONS:**

1. The appellant has not been recommended against any of the advertised posts. She is not a genuine recommendee / selectee of the Public Service Commission in respect of the post in question.
2. That the instant Service Appeal is not maintainable against the replying Respondent No.3.
3. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission in the instant case.
4. That the appellant is misleading this Honorable Service Tribunal.
5. That instant Service Appeal is liable to be dismissed with special costs as the same is based on ulterior motives of the appellant.
6. Instant service appeal is based on misrepresentation.

ON FACTS:

- 1-2. Pertains to personal information of the appellant, no comments.
3. That the Khyber Pakhtunkhwa Public Service Commission advertised 973 posts of SETs/SSTs vide Advertisement No. 01/2009 S.No. 55 dated 26.01.2009 with the following qualifications:

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(Annex-A)

Furthermore recommendation and list of candidates who were recommended to Government for appointment is **(Annex-B)**.

2

4. Incorrect. The appellant has not been recommended against any of the advertised posts. List of the genuine recommendees is annexed as B. The appellant has not provided any proof of her recommendation by the Public Service Commission.

5-8. Not pertaining to Public Service Commission.

GROUND.


A-C. Not pertaining to Public Service Commission.

D. Incorrect. The appellant concerned is not a recommendee / selectee of the Khyber Pakhtunkhwa Public Service Commission as explained in Para 4.

E-F. Not pertaining to Public Service Commission.

G. The appellant may not be allowed to raise any other grounds during the course of arguments against the replying respondent Khyber Pakhtunkhwa Public Service Commission.

It is, therefore, most humbly prayed that in light of above submissions the instant Service Appeal may kindly be dismissed with cost.


CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)

شالہ

4

Annex-A

NWFP PUBLIC SERVICE COMMISSION**2- Fort Road Peshawar Cantt:****Website: www.nwfppsc.gov.pk**Dated: 26-01-2009**ADVERTISEMENT No. 01 / 2009.**

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). **Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.**

(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

**REVISED MERIT LIST OF FEMALE SET (ARTS) (B-16) IN
SCHOOL & LITERACY DEPARTMENT**

Annex B

(5)

Merit No.	Total Marks	Interview Marks	Date of Birth	Name with Father Name	Domicile / Zone	Page #
1	71	48	01.03.78	Hina Ambreen D/O Muhammad Iqbal	Malakand Agency / 3	M
2	71	48	13.02.82	Aneela Nazir D/O Muhammad Nazir	Mansehra / 5	M
3	70	48	13.02.81	Khushbakht D/O Abdul Qayyum Khan	Haripur / 5	
4	69	48	03.04.85	Farhat Rashid D/O Abdur Rashid	Mansehra / 5	M
5	68	48	12.04.80	Nazia D/O Zafar Ali Khan	Swat / 3	
6	68	48	06.06.85	Huma Shahab D/O Sher Muhammad Shahab	Malakand Agency / 3	M
7	67	48	31.12.83	Uzma Karim D/O Muhammad Karim	Swat / 3	M
8	67	46	25.11.81	Benazir D/O Rafi Ullah Khan	Bannu / 4	
	67	45	06.05.70	Mahmood Nijat D/O Zahir ud Din	Mardan / 2	
	67	45	01.01.73	Nighat Tahira D/O Gul Rehman	Peshawar / 2	
11	67	45	30.07.86	Saima Islam D/O Noor ul Islam	Lakki Marwat / 4	
12	66	48	02.01.82	Asma Nabi D/O Ghulam Nabi	Dir / 3	M
13	66	48	15.08.83	Nafees Bibi D/O Muhammad Rashid	Malakand Agency / 3	M
14	66	48	14.12.84	Sadaf Mohib D/O Mohib Ullah	Dir / 3	M
15	66	47	07.03.78	Farzana Younas D/O Muhammad Younas	Abbottabad / 5	
16	66	47	01.04.84	Mahpara D/O Khan Sahib	Abbottabad / 5	
17	66	46	21.02.71	Hafeeza D/O Muzammil Shah	Haripur / 5	M
18	66	46	30.05.77	Khalida Shaheen D/O Muhammad Ishaque	Abbottabad / 5	M
19	66	46	23.04.79	Rabia Jabbar D/O Abdul Jabbar Khan	DI Khan / 4	
20	66	46	25.03.87	Shakeela Hanan D/O Abdul Hanan	Lakki Marwat / 4	
21	66	45	30.04.77	Wahida Bibi D/O Hamish Gul	Malakand Agency / 3	
	66	45	10.12.77	Sahira D/O Sarzamin Khan	Swat / 3	
23	66	45	23.03.78	Zahida Kousar D/O Ghulam Hussain	Bannu / 4	M
	66	45	01.01.79	Nasira Begum D/O Rehan Zaman	Charsadda / 2	
25	66	45	07.12.79	Nazia Begum D/O Yousaf Shah	Gadoon / 3	
26	66	45	01.02.80	Saima Abbas D/O Abbas Ali	Mardan / 2	
27	66	45	01.01.81	Fozia Akbar D/O Akbar Khan	Bannu / 4	
28	66	45	15.03.81	Gul Naz Begum D/O Lajbar Khan	Swabi / 2	
29	66	45	20.03.81	Nadia Sani D/O Muhammad Ashraf	Abbottabad / 5	
30	66	45	18.11.82	Nazia Zeb D/O Aurang Zeb	Haripur / 5	M
31	66	44	01.06.78	Riffat Kalsoom D/O Gulmar Jan	Lakki Marwat / 4	M
32	66	44	06.06.81	Lubna Nazneen D/O Salah ud Din	Bannu / 4	
33	66	44	12.02.84	Aalia Zeb D/O Aurang Zeb	Abbottabad / 5	
34	66	44	10.05.84	Shahnaz Ahmad Ali D/O Ahmad Ali	DI Khan / 4	M
35	66	44	10.03.85	Hina D/O Farid Ullah	Bannu / 4	M
36	65	48	03.03.80	Romania D/O Bahroz Khan	Malakand Agency / 3	
37	65	47	04.12.86	Azra Khan D/O Nasr Ullah Jan	Bannu / 4	M
38	65	46	01.07.81	Moona Khan D/O Bashir Ahmad	Haripur / 5	
39	65	46	03.03.82	Najma Begum D/O Sir Anjam Khan	Bannu / 4	
40	65	46	02.06.87	Rubina Kanwal D/O Malik Atta	DI Khan / 4	M

1	65	45	18.11.76	Sabina Yasmin D/O Fazl-e-Wahab	Malakand Agency / 3
2	65	45	27.02.77	Lubna Toheed D/O Said Qamresh	Mardan / 2
3	65	45	24.12.77	Bushra Anjum D/O Abdul Latif	Peshawar / 2
4	65	45	20.02.79	Naheed Begum D/O Sultan Muhammad	Mardan / 2
5	65	45	03.04.80	Shabana Gul D/O Imdad Ali Khan	Bannu / 4
6	65	45	14.06.80	Sadia Noureen D/O Afzal Hussain	Peshawar / 2
7	65	45	12.02.81	Saima Javed D/O Javed	Peshawar / 2
8	65	45	01.03.81	Faseeha Malik D/O Malik Bashir Ahmad	Haripur / 5
9	65	45	11.03.81	Farkhanda Jabeen D/O Abdul Karim	Chitral / 3
10	65	45	01.04.81	Zakia Bibi D/O Jehangir Khan	Swat / 3
11	65	45	03.02.82	Mubarka D/O Muhammad Khalid	Abbottabad / 5
12	65	45	12.02.82	Zakia Mehnaz D/O Jan Muhammad	Kohat / 4
13	65	45	14.08.83	Farhat Ara D/O Gul Nawab	Mardan / 2
14	65	45	01.03.84	Shagufta Yousaf D/O Muhammad Yousaf	Peshawar / 2
15	65	45	05.03.84	Tamana D/O Muhammad Aleem	Swat / 3
16	65	45	01.01.85	Kishwar Bibi D/O Muhammad Miskeen Awan	Mansehra / 5
17	65	45	18.05.85	Uzma Bibi D/O Aurang Zeb	UDA Mansehra / 3
18	65	45	31.10.85	Uroosa Noufame D/O Nadir Zaman	DI Khan / 4
19	65	45	07.05.86	Maria Gul D/O Pir Muhammad	Mansehra / 5
20	65	44	14.10.78	Shaheen Qadir D/O Qadir Khan	Bannu / 4
21	65	44	01.01.82	Hajra Bibi D/O Atta Ullah Khan	Haripur / 5
22	65	42	05.02.82	Lubna Jahan D/O Noor ur Rehman	Peshawar / 2
23	65	42	03.09.82	Qamarun Nissa Qamar D/O Muhammad Inayat Ullah	Nowshera / 2
24	65	42	28.03.84	Sadia Mahmood D/O Sultan Mahmood Khattak	Karak / 4
25	64	48	20.05.77	Shamima KHatoon D/O Haji Fazal Naeem	Dir / 3
26	64	46	01.02.84	Anila Tariq D/O Muhammad Tariq	Lakki Marwat / 4
27	64	46	01.02.85	Salma Ahmad D/O Fazal Ahmad	Swat / 3
28	64	45	27.02.75	Zahida Begum D/O Inayat Ullah	Buner / 3
29	64	45	30.05.78	Rehana Kausar D/O Muhammad Nawaz Khan	Abbottabad / 5
30	64	45	12.12.78	Tahira Noreen D/O Gul Zar Ahmad	DI Khan / 4
31	64	45	03.03.79	Ishrat Begum D/O Muhammad Sadique	Malakand Agency / 3
32	64	45	15.04.81	Safia Begum D/O Muslim Khan	Peshawar / 2
33	64	45	01.01.82	Habiba Begum D/O Shahriyar Khan	Dir / 3
34	64	45	01.03.82	Nageena D/O Itbar Gul	Malakand Agency / 3
35	64	45	01.04.82	Rahila Bibi D/O Kator Khan	Mardan / 2
36	64	45	01.02.83	Najma Bibi D/O Imdad ul Ghaffar	Malakand Agency / 3
37	64	45	04.02.83	Zujajah Tabbassum Hashmi D/O Muhammad Aslam Shah	DI Khan / 4
38	64	45	20.04.83	Amina Bibi D/O Aman Khan	Haripur / 5
39	64	45	01.01.84	Asima Noreen D/O Abdul Sattar	DI Khan / 4
40	64	45	15.03.84	Irum Butt D/O Aftab Ahmad Butt	Peshawar / 2
41	64	45	20.03.85	Nuzhat Riaz Bangash D/O Riaz Muhammad Bangash	Hangu / 4
42	64	45	16.11.85	Meh Para Siddique D/O Muhammad Siddique	Abbottabad / 5
43	64	45	07.03.86	Asma D/O Amir Kalam Shah	Mardan / 2

84	64 ✓	44 ✓	01.01.76 ✓	Malika Bibi D/O Ghulam Sarwar ✓	Haripur / 5 ✓
85	64 ✓	44 ✓	01.01.79 ✓	Farzana D/O Hamesh Gul ✓	Malakand Agency / 3 ✓
86	64 ✓	44 ✓	15.07.81 ✓	Abida Asghar D/O Muhammad Asghar Khan ✓	Abbottabad / 5 M
87	64 ✓	43 ✓	30.04.80 ✓	Saima Noreen D/O Muhammad Sualiheen ✓	Swat / 3 ✓
88	64 ✓	43 ✓	27.12.80 ✓	Shagufta Begum D/O Muhammad Sahib Khan ✓	Bannu / 4 ✓
89	64 ✓	43 ✓	02.08.84 ✓	Rehana Afzal D/O Qari Muhammad Afzal ✓	DI Khan / 4 ✓
90	64 ✓	43 ✓	07.03.85 ✓	Saadia Minhas Hussain D/O Haji Muhammad Husain ✓	Bannu / 4 ✓ M
91	64 ✓	42 ✓	02.05.71 ✓	Robina Khan D/O Naseer Ahmad Khan ✓	Nowshera / 2 ✓
92	64 ✓	42 ✓	14.10.81 ✓	Khadija Samar Rehman D/O Abdul Rehman Mano Khan ✓	Peshawar / 2 ✓
93	64 ✓	42 ✓	28.01.85 ✓	Sara Ambreen D/O Ajab Khan ✓	DI Khan / 4 ✓ M
94	64 ✓	42 ✓	16.04.85 ✓	Humaira Ali D/O Sabz Ali ✓	Swabi / 2 ✓ M
95	64 ✓	42 ✓	08.11.86 ✓	Huma Rehman D/O Amir ur Rehman ✓	Swabi / 2 ✓
96	64 ✓	41 ✓	08.07.79 ✓	Nighat Khurshid D/O Jamal Noor ✓	Karak / 4 ✓
98	63 ✓	48 ✓	03.04.78 ✓	Kalsoom Begum D/O Masal Khan ✓	Malakand Agency / 3 ✓
99	63 ✓	45 ✓	15.05.76 ✓	Najma Begum D/O Naik Muhammad ✓	Dir / 3 ✓
100	63 ✓	45 ✓	02.03.78 ✓	Shazia D/O Mukhtar Ahmad ✓	Swat / 3 ✓ M
101	63 ✓	45 ✓	25.03.81 ✓	Meher un Nisa D/O Zain ul Abidin ✓	Dir / 3 ✓
102	63 ✓	45 ✓	21.05.81 ✓	Farzana D/O Aman Ullah Khan ✓	Malakand Agency / 3 M
103	63 ✓	45 ✓	21.05.81 ✓	Memoona Rehman D/O Qari Abdul Rehman ✓	DI Khan / 4 ✓
104	63 ✓	45 ✓	25.04.83 ✓	Malika Arafeen D/O Zulfiqar Ali Khan ✓	Chitral / 3 ✓
105	63 ✓	45 ✓	16.07.83 ✓	Saima Ilyas D/O Ilyas Victor ✓	Peshawar / 2 ✓
106	63 ✓	45 ✓	06.08.85 ✓	Ambareen Zeb D/O Jahan Zeb ✓	Peshawar / 2 ✓
107	63 ✓	45 ✓	20.09.86 ✓	Naveeda Rustam D/O Rustam Khan ✓	UDA Mansehra / 3 ✓
108	63 ✓	44 ✓	04.05.78 ✓	Bakht Naz D/O Lal Ghani ✓	Bannu / 4 ✓
109	63 ✓	44 ✓	05.03.82 ✓	Asia Javed D/O Muhammad Saleem Javed ✓	DI Khan / 4 ✓ M
110	63 ✓	44 ✓	14.02.85 ✓	Amina Qazi D/O Qazi Muhammad Sadiq ✓	Peshawar / 2 ✓
111	63 ✓	44 ✓	25.02.85 ✓	Sumira Channa D/O Aziz ur Rehman ✓	Kohat / 4 ✓ M
112	63 ✓	43 ✓	03.01.78 ✓	Naheed Akbar D/O Akbar Zaman ✓	Bannu / 4 ✓
113	63 ✓	43 ✓	01.05.79 ✓	Mukadus Jabeen D/O Syed Sultan Shah ✓	Haripur / 5 ✓
114	63 ✓	43 ✓	10.11.81 ✓	Asima Bibi D/O Muhammad Gulzar ✓	Abbottabad / 5 ✓
115	63 ✓	43 ✓	05.02.82 ✓	Munawar Sultana D/O Muhammad Subhan ✓	Bannu / 4 ✓ M
116	63 ✓	43 ✓	23.03.82 ✓	Ajia Perveen D/O Shaikh Meraj ud Din ✓	DI Khan / 4 ✓ M
117	63 ✓	43 ✓	07.03.84 ✓	Uzma Gul D/O Gul Muhammad ✓	Malakand Agency / 3
118	63 ✓	43 ✓	10.06.84 ✓	Noor Afshan D/O Abdul Hameed ✓	Haripur / 5 ✓
119	63 ✓	43 ✓	02.02.87 ✓	Naila D/O Rafi Ullah Khan ✓	Bannu / 4 ✓ H
120	63 ✓	42 ✓	01.01.72 ✓	Farzana Begum D/O Said Badshah ✓	Swabi / 2 ✓
121	63 ✓	42 ✓	01.05.76 ✓	Haleema Farooq D/O Muhammad Farooq ✓	Swabi / 2 ✓
122	63 ✓	42 ✓	01.01.77 ✓	Faria Bibi D/O Noor Muhammad ✓	Malakand Agency / 3 ✓
123	63 ✓	42 ✓	22.11.77 ✓	Kalsoom Salma D/O Wali Ullah ✓	Charsadda / 2 ✓ M
124	63 ✓	42 ✓	03.02.78 ✓	Lala Rukh D/O Mohib Ullah ✓	Mardan / 2 ✓
125	63 ✓	42 ✓	24.05.79 ✓	Saira Jabeen D/O Noor Qadir ✓	Malakand Agency / 3 ✓
126	63 ✓	42 ✓	13.09.79 ✓	Nousheen D/O Ghias ud Din ✓	Peshawar / 2 ✓ M
127	63 ✓	42 ✓	05.05.80 ✓	Shahida D/O Muhammad Aleem ✓	Swat / 3 ✓

27	63	42	14.07.80	Nighat Sabah D/O Syed Karim ur Raziq	Swabi / 2
28	63	42	20.03.81	Shawana D/O Abdur Raziq	Malakand Agency / 3
29	63	42	01.01.82	Safina Begum D/O Muhammad Karim	Dir / 3
30	63	42	15.03.82	Salima Khan D/O Beladar Khan	Swat / 3
31	63	42	10.04.82	Aisha Sadiqa D/O Dilawar Khan	Lakki Marwat / 4
32	63	42	31.01.83	Shaista Samad D/O Abdus Samad Khan	Chitral / 3
33	63	42	13.02.83	Mehreen Ali D/O Sher Ali Khan	Mardan / 2
34	63	42	02.03.83	Humaira Bibi D/O Muhammad Anwar Khan	Haripur / 5
35	63	42	09.03.83	Mehnaz Begum D/O Jamroz Khan	Mardan / 2
36	63	42	10.01.84	Shabina Khan D/O Liaqat Ali Khan	Nowshera / 2
37	63	42	20.01.84	Mehnaz D/O Murtaza Khan Khattak	Nowshera / 2
38	63	42	18.08.84	Rabia Khatoon D/O Fazal e Wahid	Swabi / 2
39	63	42	29.08.84	Saira D/O Muhammad Usman	Mardan / 2
40	63	39	10.09.86	Farhana Malik D/O Malik Zad Khan	Bannu / 4
41	62	45	02.02.72	Mehraj Shaheen Khattak D/O Zarin Gul Khattak	Nowshera / 2
42	62	45	11.02.74	Robina D/O Sher Zaman	Peshawar / 2
43	62	45	12.03.75	Romana Jaffar D/O Ghulam Jaffar	Malakand Agency / 3
44	62	45	06.06.77	Shazia Ahmad D/O Ahmad Gul	Dir / 3
45	62	45	25.04.79	Shahnaz Bibi D/O Zia ud Din	DI Khan / 4
46	62	45	15.05.79	Bacha Rahmat D/O Gul Chaman	Swat / 3
47	62	45	10.04.80	Taslim D/O Muhammad Zarin	Dir / 3
48	62	45	02.04.81	Bushra Begum D/O Abdul Azeem	Dir / 3
49	62	45	03.04.81	Muharam Bibi D/O Haji Sad Ullah Khan	Malakand Agency / 3
50	62	45	10.11.81	Razia Bibi D/O Muhammad Razaq	Swat / 3
51	62	45	15.03.82	Salma D/O Izzat Ullah	Swabi Gadoon / 3
52	62	45	05.05.83	Safina Bibi D/O Nadir Wali Khan	Chitral / 3
53	62	45	19.07.83	Haseena Gul D/O Aurang Zeb	Malakand Agency / 3
54	62	45	01.04.84	Kausar Jahan D/O Musa Muhammad Ali Shah	Chitral / 3
55	62	45	23.03.87	Rabia Isa D/O Asmat Isa Khan	Chitral / 3
56	62	44	31.01.80	Rabia Kamal D/O Gul Kamal	Lakki Marwat / 4
57	62	44	08.04.84	Asma Bibi D/O Haji Abdul Aziz	Abbottabad / 5
58	62	44	10.04.85	Zakia Naheed D/O Wahid Bakhsh	Lakki Marwat / 4
59	62	44	01.05.85	Noor Shad D/O Shakil ur Rehman	Bannu / 4
60	62	43	22.08.76	Tehmina Mukhtar D/O Mukhtar Hussain Shah	Abbottabad / 5
61	62	43	15.07.79	Azra Sultan Jadoon D/O Muhammad Sultan Jadoon	Haripur / 5
62	62	42	05.01.70	Yasmin Begum D/O Ghazi Khan	Dir / 3
63	62	42	15.03.75	Rabia Fayaz D/O Fayaz Ahmad	Peshawar / 2
64	62	42	01.04.75	Rafia Malik D/O Amir Muhammad Malik	Swabi / 2
65	62	42	10.10.76	Saima Sardar D/O Sardar ul Islam	Nowshera / 2
66	62	42	04.02.77	NUsrat Jehan D/O Umer Ali Khan	Bannu / 4
67	62	42	15.02.77	Nazakat D/O Nazir Muhammad	Peshawar / 2
68	62	42	06.04.78	Ambreen Jillani D/O Saif ur Rehman	Mardan / 2
69	62	42	23.01.79	Farhat Shah D/O Shah Roze	Malakand Agency / 3
70	62	42	05.04.79	Safina Akhtar D/O Rustam Ali	Swabi / 2

171.	62 ✓	42 ✓	15.10.79 ✓	Sajela Naz D/O Sherin Zada ✓	Dir / 3 ✓
172.	62 ✓	42 ✓	10.04.80 ✓	Shabnam Zaman D/O Amir Zaman ✓	Dir / 3 ✓ M
173.	62 ✓	42 ✓	18.04.80 ✓	Naveeda Akhtar D/O Mian Fazli Dayan ✓	Nowshera / 2 ✓
174.	62 ✓	42 ✓	18.05.80 ✓	Huma Ali D/O Shaukat Ali ✓	Charsadda / 2 ✓ M
175.	62 ✓	42 ✓	07.07.80 ✓	Naveeda Begum D/O Banat Gul ✓	Charsadda / 2 ✓ M
176.	62 ✓	42 ✓	12.02.81 ✓	Samina Akhtar D/O Sardar Abdul Hakeem ✓	Dir / 3 ✓
177.	62 ✓	42 ✓	07.03.81 ✓	Musarat Bushra D/O Gul Raees ✓	Lakki Marwat / 4 ✓
178.	62 ✓	42 ✓	02.04.81 ✓	Sadia NAZIR D/O Muhammad Nazir ✓	Kohat / 4 ✓
179.	62 ✓	42 ✓	15.04.81 ✓	Tajir Bano D/O Mir Zaman ✓	Kohat / 4 ✓
180.	62 X	42 X	01.05.81 ✓	Irum Naz D/O Muhammad Iqbal ✓	UDA Mansehra / 3 ✓
181.	62 ✓	42 ✓	05.09.81 ✓	Shaheen Akhtar D/O Gul Daraz Khan ✓	Nowshera / 2 ✓
182.	62 ✓	42 ✓	22.01.82 ✓	Zilhia D/O Silawar Khan ✓	Karak / 4 ✓
183.	62 ✓	42 ✓	21.02.82 ✓	Mehnaz Gul D/O Mian Noor Rehman ✓	Nowshera / 2 ✓ M
184.	62 ✓	42 ✓	05.04.82 ✓	Zeenat Begum D/O Feroz Khan ✓	Bannu / 4 ✓ M
185.	62 ✓	42 ✓	14.04.82 ✓	Nishpari D/O Muhammad Amin ✓	Malakand Agency / 3 ✓
186.	62 ✓	42 ✓	15.04.82 ✓	Zeenat D/O Abdul Manan ✓	Swat / 3 ✓ M
187.	62 ✓	42 ✓	20.04.82 ✓	Nadia Iqbal D/O Muhammad Iqbal ✓	Bannu / 4 ✓
188.	62 ✓	42 ✓	27.05.82 ✓	Saima Ali D/O Ghulam Ali ✓	Peshawar / 2 ✓
189.	62 ✓	42 ✓	19.11.82 ✓	Farhat Bibi D/O Afsar Ali Shah ✓	Bannu / 4 ✓ M
190.	62 ✓	42 ✓	12.12.82 ✓	Sadaf Azim D/O Azim Khan ✓	Swabi / 2 ✓
191.	62 ✓	42 ✓	12.02.83 ✓	Shaheen D/O Ghulam Muhammad ✓	Malakand Agency / 3 ✓
192.	62 ✓	42 ✓	01.04.83 ✓	Naila Begum D/O Israr ul Haq ✓	Dir / 3 ✓
193.	62 ✓	42 ✓	15.04.83 ✓	Shaista Rehman D/O Habib ur Rehman ✓	Swat / 3 ✓ M
194.	62 ✓	42 ✓	23.08.83 ✓	Aisha Habib D/O Habib ur Rehman ✓	Charsadda / 2 ✓
195.	62 ✓	42 ✓	20.09.83 ✓	Sadia Younas D/O Muhammad Younas ✓	Peshawar / 2 ✓ M
196.	62 ✓	42 ✓	01.11.83 ✓	Mehwish Javed D/O Javed Iqbal ✓	Peshawar / 2 ✓
197.	62 ✓	42 ✓	26.11.83 ✓	Fauzia Ambreen D/O Gul Baz Khan ✓	Charsadda / 2 ✓ M
198.	62 ✓	42 ✓	12.04.85 ✓	Saima Naz D/O Haji Umar Said ✓	Mardan / 2 ✓
199.	62 ✓	42 ✓	05.08.85 ✓	Lubna Bano D/O Hanif Ghulam ✓	Nowshera / 2 ✓ M
200.	62 ✓	42 ✓	14.04.86 ✓	Sarwat Begum D/O Sher Zamin ✓	Malakand Agency / 3 ✓
201.	62 ✓	42 ✓	15.06.86 ✓	Samra Khan D/O Muhammad Yousaf Khan ✓	Peshawar / 2 ✓ M
202.	62 ✓	42 ✓	31.07.86 ✓	Sadia Aizdi D/O Mushtaq Ahmad ✓	DI Khan / 4 ✓
203.	62 ✓	42 ✓	04.09.87 ✓	Saima Sultan Khel D/O Muhammad Hanif Sultan Khel ✓	DI Khan / 4 ✓
204.	62 ✓	41 ✓	09.04.78 ✓	Sumiyya Anis D/O Anis Ahmad ✓	Abbottabad / 5 ✓
205.	62 ✓	41 ✓	01.03.80 ✓	Benazir Irshad D/O Muhammad Irshad Hussain ✓	Karak / 4 ✓
206.	62 ✓	41 ✓	03.10.82 ✓	Zobia Bibi D/O Abdul Ghafoor ✓	Haripur / 5 ✓
207.	62 ✓	40 ✓	07.01.78 ✓	Salma Rafique D/O Muhammad Rafique ✓	Khyber Agency / 1 ✓
208.	62 ✓	40 ✓	02.04.78 ✓	Najma Begum D/O Muhammad Zaman ✓	Kohat / 4 ✓ M
209.	62 ✓	40 ✓	26.04.82 ✓	Iram Nawab Khan D/O Zar Nawab Khan ✓	Swabi / 2 ✓
210.	62 ✓	40 ✓	01.04.83 ✓	Irum Andaleeb Qureshi D/O Altaf Hussain Qureshi ✓	Tank / 4 ✓ M
211.	62 ✓	40 ✓	15.05.83 ✓	Fozia Bashir D/O Muhammad Bashir ✓	Kohat / 4 ✓
212.	62 ✓	40 ✓	07.07.84 ✓	Saima Naz Khan D/O Noor Nawaz Khan ✓	Karak / 4 ✓ M
213.	62 ✓	38 ✓	01.05.83 ✓	Aalia Khan D/O Bahadar Nawaz Khan ✓	Bannu / 4 ✓
214.	61 ✓	47 ✓	24.03.80 ✓	Mehnaz Afridi D/O Muhammad Iqbal ✓	Khyber Agency / 1 ✓

215.	61 ✓	45 ✓	09.03.79 ✓	Basmin D/O Muhammad Zarin ✓	Dir / 3 ✓ ✓
216.	61 ✓	45 ✓	12.03.81 ✓	Safia Nawaz D/O Shah Nawaz ✓	Malakand Agen ✓
217.	61 ✓	45 ✓	31.03.83 ✓	Alia Balqees D/O Muhammad Wali ✓	Malakand Agen ✓
218.	61 ✓	43 ✓	08.12.74 ✓	Shaista Aman D/O Fazal Aman ✓	Malakand Agen ✓
219.	61 ✓	43 ✓	21.05.83 ✓	Amna Bibi D/O Munsif Khan ✓	Abbottabad / 5 ✓
220.	61 ✓	43 ✓	10.04.84 ✓	Shumaila Bashir D/O Muhammad Bashir ✓	DI Khan / 4 ✓
221.	61 ✓	42 ✓	05.02.67 ✓	Farah Naz D/O Syed Askar ✓	Khyber Agency ✓
222.	61 ✓	42 ✓	15.01.73 ✓	Nasreen Mahmood D/O Mahmood Khan ✓	Swat / 3 ✓
223.	61 ✓	42 ✓	03.09.77 ✓	Shahana Parveen D/O Muhammad Shah ✓	Chitral / 3 ✓
224.	61 ✓	42 ✓	02.02.78 ✓	Zubaida Faryal D/O Khair ul Bashar ✓	Nowshera / 2 ✓
225.	61 ✓	42 ✓	28.09.78 ✓	Tehmina Faiz D/O Faiz Muhammad ✓	DI Khan / 4 ✓
226.	61 ✓	42 ✓	05.10.78 ✓	Nazli Tabassum D/O Mian Salim Shah ✓	Nowshera / 2 ✓
227.	61 ✓	42 ✓	01.01.79 ✓	Samina Yousaf D/O Muhammad Yousaf ✓	Peshawar / 2 ✓
228.	61 ✓	42 ✓	08.01.79 ✓	Nagina Naz D/O Shabir Ahmad ✓	Swabi / 2 ✓
229.	61 ✓	42 ✓	09.02.79 ✓	Shah Bibi D/O Gul Muhammad ✓	Peshawar / 2 ✓
230.	61 ✓	42 ✓	28.03.79 ✓	Aasfa Aslam D/O Muhammad Aslam ✓	Bannu / 4 ✓
231.	61 ✓	42 ✓	01.04.79 ✓	Abida Fida Muhammad D/O Fida Muhammad ✓	Peshawar / 2 ✓
232.	61 ✓	42 ✓	20.04.79 ✓	Aneesa Chand D/O Muhammad Khalbal ✓	Malakand Agen ✓
233.	61 ✓	42 ✓	24.01.80 ✓	Neelam Naz D/O Musaffar Khan ✓	Mardan / 2 ✓
234.	61 ✓	42 ✓	02.04.80 ✓	Ghazala Khan D/O Fatah Muhammad Khan ✓	Mardan / 2 ✓
235.	61 ✓	42 ✓	03.04.80 ✓	Zohra Rashid D/O Rashid Ahmad ✓	Swat / 3 ✓
236.	61 ✓	42 ✓	11.05.80 ✓	Farah Deeba D/O Muhammad Ashraf Qureshi ✓	Peshawar / 2 ✓
237.	61 ✓	42 ✓	03.10.80 ✓	Sanober Bano D/O Yousaf Ali Azad ✓	Bannu / 4 ✓
238.	61 ✓	42 ✓	11.01.81 ✓	Gul Rukh D/O Muhammad Tariq ✓	Peshawar / 2 ✓
239.	61 ✓	42 ✓	27.01.81 ✓	Irum Hassan D/O Syed Hassan Badshah ✓	Mardan / 2 ✓
240.	61 ✓	42 ✓	08.02.81 ✓	Araba Begum D/O Muhammad Shoaib ✓	Buner / 3 ✓
241.	61 ✓	42 ✓	10.04.81 ✓	Gul Bano D/O Shafi Ullah ✓	Swabi / 2 ✓
242.	61 ✓	42 ✓	20.04.81 ✓	Shazia D/O Muhammad Ali ✓	Bannu / 4 ✓
243.	61 ✓	42 ✓	28.01.82 ✓	Huma Bibi D/O Syed Muhammad Aqil Shah ✓	Mardan / 2 ✓
244.	61 ✓	42 ✓	10.04.82 ✓	Shukria Bibi D/O Fazal Karim ✓	Chitral / 3 ✓
245.	61 ✓	42 ✓	30.08.82 ✓	Saeeda Aslam D/O Muhammad Aslam ✓	Bannu / 4 ✓
246.	61 ✓	42 ✓	11.11.82 ✓	Zubaida khaton D/O Noor Nawaz ✓	Kohat / 4 ✓
247.	61 ✓	42 ✓	25.11.82 ✓	Yasmeen Akhtar D/O Sardar Banaras Khan ✓	Abbottabad / 5 ✓
248.	61 ✓	42 ✓	14.12.82 ✓	Nagina Sarwar D/O Ghulam Sarwar ✓	Nowshera / 2 ✓
249.	61 ✓	42 ✓	14.02.83 ✓	Mamnoon Begum D/O Nazar Ali Shah ✓	Charsadda / 2 ✓
250.	61 ✓	42 ✓	01.04.83 ✓	Huma Begum D/O Sufaid Shah ✓	Swabi / 2 ✓
251.	61 ✓	42 ✓	18.04.83 ✓	Saima Moeen D/O Moeen ud Din ✓	Peshawar / 2 ✓
252.	61 ✓	42 ✓	07.08.83 ✓	Arifa Naz D/O Iftikhar Ahmad Bhatti ✓	Peshawar / 2 ✓
253.	61 ✓	42 ✓	20.10.83 ✓	Zeenat Afsar D/O Afsar Zaman ✓	Bannu / 4 ✓
254.	61 ✓	42 ✓	01.01.84 ✓	Tazzeen Yousaf D/O Qazi Muhammad Yousaf ✓	Bannu / 4 ✓
255.	61 ✓	42 ✓	10.03.84 ✓	Rahat Naz D/O Inayat Ullah ✓	Shangla / 3 ✓
256.	61 ✓	42 ✓	01.04.84 ✓	Madiha Gohar D/O Gohar Ali ✓	Nowshera / 2 ✓
257.	61 ✓	42 ✓	02.05.84 ✓	Abida Bibi D/O Sabir Shah ✓	Dir / 3 ✓

258	61	42	15.06.84	Humaria Gul D/O Syed Zahid Shah	Peshawar / 2
259	61	42	11.04.85	Rana D/O Qalandar Khan	Nowshera / 2
260	61	42	30.10.85	Nazia Ferdous D/O Haji Nobat Khan	Lakki Marwat / 4
261	61	42	10.02.86	Safia Bibi D/O Abdul Rehman	Kohat / 4
262	61	42	20.06.86	Faiza Saeed D/O Saeed Anwar Khan	Kohat / 4
263	61	41	25.12.79	Mussarat Jabeen D/O Juma Khan	Lakki Marwat / 4
264	61	41	03.06.80	Shabana Ali D/O Mirza Ali Khan	Kohat / 4
265	61	41	15.09.84	Saira Naeem D/O Naeem Ilahi	DI Khan / 4
266	61	40	01.04.71	Diilshad Begum D/O Sahib Zaman	Bannu / 4
267	61	40	22.12.75	Sara Shiraz D/O Muhammad Shiraz	Abbottabad / 5
268	61	40	12.06.76	Shazia Gul D/O Aziz ur Rehman	Haripur / 5
269	61	40	09.06.80	Shaista Zahid D/O Zahid Ullah	Kohat / 4
270	61	40	03.07.80	Fozia D/O Bashir Ahmad	DI Khan / 4
271	61	40	08.08.80	Shazia Rubbani D/O Ghulam Rubbani	Peshawar / 2
272	61	40	15.04.81	Sobia Bibi D/O Muhammad Misri Khan	Haripur / 5
273	61	40	19.08.82	Sajida Zakir D/O Haji Muhammad Zakir Shah	Peshawar / 2
274	61	40	01.04.83	Asma Kiran D/O Fayyaz Muhammad	Kohat / 4
275	61	40	23.04.84	Fariha Inayat D/O Inayat Ullah Khan	DI Khan / 4
276	61	40	14.04.85	Dilnasheen D/O Hamid Ilyas	Kohat / 4
277	61	38	12.08.79	Musarrat Shah D/O Sher Bahader	Swat / 3
278	61	38	10.03.83	Siddiqa Bibi D/O Muhammad Jamil	Haripur / 5
279	60	45	01.03.77	Naseem Akhtar D/O Fateh Khan	Malakand Agency / 3
280	60	45	02.07.81	Neelam Ilyas D/O Muhammad Ilyas	Dir / 3
281	60	44	01.08.79	Gul Bibi D/O Ali Zaman	Abbottabad / 5
282	60	43	14.03.84	Saeeda Faiz D/O Faiz Ullah	DI Khan / 4
283	60	42	24.02.75	Samina Akhtar D/O Abdur Rashid	DI Khan / 4
284	60	42	14.11.76	Nazneen Shams D/O Shams ud Din	Mansehra / 5
285	60	42	02.01.77	Fouzia D/O Ghulam Haider	Malakand Agency / 3
286	60	42	16.01.77	Samina Razzaq D/O Abdur Razzaq	Dir / 3
287	60	42	08.06.77	Zubaida Bano D/O Haji Shafiq ur Rehman	Lakki Marwat / 4
288	60	42	30.11.77	Rashida Rahim Baig D/O Rahim Baig	Chitral / 3
289	60	42	04.04.78	Abida Bibi D/O Munsif Khan	Abbottabad / 5
290	60	42	15.03.79	Fozia Jabeen D/O Mehboob Gul	Nowshera / 2
291	60	42	07.11.79	Zamurrud Mushtaq Qureshi D/O Muhammad Mushtaq Qureshi	DI Khan / 4
292	60	42	12.01.80	Rani Gul D/O Muhammad Muzaffar Khan	Nowshera / 2
293	60	42	05.02.80	Sadia Iram D/O Muhammad Akram	Peshawar / 2
294	60	42	15.10.80	Sadaqat Begum D/O Inam Ullah	Charsadda / 2
295	60	42	05.02.81	Azra D/O Bahadar Khan	Buner / 3
296	60	42	08.06.81	Nafisa Umar D/O Muhammad Umar Khan	Malakand Agency / 3
297	60	42	16.01.82	Sakina D/O Abdul Qayyum	Bannu / 4
298	60	42	07.05.82	Maimoona Bibi D/O Amir Nowrooz Khan	Chitral / 3
299	60	42	19.08.82	Salma D/O Muhammad Hussain	Malakand Agency / 3
300	60	42	04.01.83	Shabnam Khan D/O Muambar Khan	Dir / 3
301	60	42	08.01.83	Rami Naz D/O Mutahir Shah	Peshawar / 2
302	60	42	16.03.83	Altaf Bibi D/O Muhammad Nawaz	Peshawar / 2

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303.	60 ✓	42 ✓	05.04.83 ✓	Najma Noreen D/O Syed Saeed Jan ✓	Dir / 3 ✓ M
304.	60 ✓	42 ✓	11.06.83 ✓	Shereen Zaman D/O Muhammad Zaman ✓	Karak / 4 ✓
305.	60 ✓	42 ✓	29.09.83 ✓	Saima Gul D/O Abdul Baqi ✓	Charsadda / 2 ✓
306.	60 ✓	42 ✓	15.01.84 ✓	Nargis D/O Shafaras Khan ✓	Mardan / 2 ✓ M
307.	60 ✓	42 ✓	03.04.85 ✓	Ambreen Gul D/O Khan Gul ✓	Peshawar / 2 ✓
308.	60 ✓	41 ✓	10.09.77 ✓	Shazia Parveen D/O Haji Allah Ditta ✓	Abbottabad / 5 ✓
309.	60 ✓	41 ✓	25.12.79 ✓	Rahat Jehan D/O Fazal Ahmad ✓	Bannu / 4 ✓ M
310.	60 ✓	41 ✓	14.04.81 ✓	Shabnam Naz D/O Muhammad Younas ✓	Abbottabad / 5 ✓
311.	60 ✓	41 ✓	25.05.81 ✓	Nargis Noreen D/O Lal Zada ✓	FR Kohat / 1 ✓
312.	60 ✓	41 ✓	10.02.82 ✓	Bibi Zainab D/O Muhammad Kamal ✓	Karak / 4 ✓
313.	60 ✓	41 ✓	01.03.83 ✓	Rani Gul D/O Jehan Zaib Khan ✓	Mansehra / 5 ✓
314.	60 ✓	41 ✓	16.08.83 ✓	Noor Pari D/O Sardar Khan ✓	Peshawar / 2 ✓ M
315.	60 ✓	41 ✓	27.01.85 ✓	Anila Khan D/O Burhan ud Din ✓	S.W Agency / 1 ✓
316.	60 ✓	40 ✓	24.03.72 ✓	Shazia Nosheen D/O Muhammad Ayub ✓	Mansehra / 5 ✓
317.	60 ✓	40 ✓	21.12.73 ✓	Saeeda Bibi D/O Muhammad Sajjad ✓	Mohmand Agency / 1 ✓
318.	60 ✓	40 ✓	14.05.74 ✓	Shagufta Fiaz D/O Qazi Muhammad Fiaz ✓	Abbottabad / 5 ✓
319.	60 ✓	40 ✓	31.12.76 ✓	Noor Jahan Khan D/O Muhammad Hanif ✓	Charsadda / 2 ✓
320.	60 ✓	40 ✓	11.01.77 ✓	Sayyeda Noreen D/O Sayyed Ijaz Hussain ✓	DI Khan / 4 ✓
321.	60 ✓	40 ✓	12.09.77 ✓	Rukhsana Akhtar D/O Muhammad Israr ✓	Mardan / 2 ✓ M
322.	60 ✓	40 ✓	11.03.79 ✓	Farrar Jabeen D/O Haji Haq Nawaz ✓	Haripur / 5 ✓
323.	60 ✓	40 ✓	07.01.81 ✓	Wijdan Niaz D/O Niaz Parwar ✓	Peshawar / 2 ✓
324.	60 ✓	40 ✓	23.03.81 ✓	Shahida Suleman D/O Suleman Khan ✓	Kohat / 4 ✓ M
325.	60 ✓	40 ✓	14.04.81 ✓	Nargis D/O Haji Anar Zaman ✓	Bannu / 4 ✓
326.	60 ✓	40 ✓	16.10.81 ✓	Rizwana Saad D/O Sad Ullah Khan ✓	Lakki Marwat / 4 ✓ M
327.	60 ✓	40 ✓	02.01.82 ✓	Shakila Bibi D/O Abdur Rehman ✓	Lakki Marwat / 4 ✓ M
328.	60 ✓	40 ✓	10.04.83 ✓	Sahira Bano D/O Muhammad Rafiq ✓	DI Khan / 4 ✓ M
329.	60 ✓	40 ✓	11.11.83 ✓	Bibi Asma Zia D/O Syed Zia ul Hassan ✓	Kohat / 4 ✓
330.	60 ✓	40 ✓	31.01.84 ✓	Sumera Khalid D/O Khalid Mehmood ✓	Mardan / 2 ✓
331.	60 ✓	40 ✓	05.05.84 ✓	Amina Bibi D/O Muhammad Zaman Khan ✓	Bannu / 4 ✓ M
332.	60 ✓	40 ✓	08.01.85 ✓	Kiran Hameed D/O Hameed Ullah ✓	DI Khan / 4 ✓
333.	60 ✓	40 ✓	17.07.85 ✓	Adila Kiran D/O Naseer Ali Bhatti ✓	DI Khan / 4 ✓ M
334.	60 ✓	40 ✓	11.09.85 ✓	Aneela Shad D/O Shad Muhammad ✓	Mardan / 2 ✓
335.	60 ✓	40 ✓	17.12.85 ✓	Uzma Manan D/O Fazle Manan ✓	Peshawar / 2 ✓
336.	60 ✓	40 ✓	20.04.87 ✓	Samina Nighat D/O Zabardast Khan ✓	Kohat / 4 ✓ M
337.	60 ✓	39 ✓	03.05.76 ✓	Nasim D/O Ghulam Jeelani ✓	Swabi / 2 ✓
338.	60 ✓	39 ✓	15.11.80 ✓	Farkhanda Jabeen D/O Shah Nawaz ✓	DI Khan / 4 ✓
339.	60 ✓	39 ✓	04.06.81 ✓	Uzma Shaheen D/O Fazal Elahi ✓	Haripur / 5 ✓
340.	60 ✓	39 ✓	03.04.82 ✓	Asia Nasira D/O Faiz ul Hassan ✓	Charsadda / 2 ✓ M
341.	60 ✓	39 ✓	12.04.84 ✓	Sarwat D/O Faqir Gul ✓	Charsadda / 2 ✓
342.	60 ✓	39 ✓	08.05.84 ✓	Sumera Mushtaq D/O Mushtaq Hussain ✓	Abbottabad / 5 ✓
343.	60 ✓	39 ✓	07.12.84 ✓	Shagufta Nawaz Awan D/O Javed Nawaz ✓	DI Khan / 4 ✓ M
344.	60 ✓	38 ✓	16.08.77 ✓	Amna Rubab D/O Hakim Raza ✓	Hangu / 4 ✓ M
345.	60 ✓	38 ✓	27.02.79 ✓	Mah Jabeen Bibi D/O Saif Ullah Khan ✓	DI Khan / 4 ✓
346.	60 ✓	38 ✓	03.03.83 ✓	Nazrana Bibi D/O Shah Jahan Khan ✓	Lakki Marwat / 4 ✓ M

347.	60 ✓	38 ✓	01.01.86 ✓	Sumaira Nazir D/O Nazir Ahmad ✓	Abbottabad / 5 ✓	
348.	60 ✓	37 ✓	04.05.83 ✓	Saima Bashir D/O Muhammad Bashir ✓	Abbottabad / 5 ✓	
349.	60 ✓	37 ✓	08.11.84 ✓	Shamaila Yousaf D/O Muhammad Yousaf ✓	Mansehra / 5 ✓	
350.	59 ✓	43 ✓	02.02.84 ✓	Noreen Akhtar D/O Umar Ayaz ✓	Kohat / 4 ✓	CC B
351.	59 ✓	42 ✓	20.03.70 ✓	Asia Noor D/O Noor Muhammad Awan ✓	Abbottabad / 5 ✓	
352.	59 ✓	42 ✓	04.04.75 ✓	Bushra Naheed D/O Zar Wali Khan ✓	Nowshera / 2 ✓	
353.	59 ✓	42 ✓	05.11.79 ✓	Huma Sher D/O Adil Sher ✓	Swabi / 2 ✓	
354.	59 ✓	42 ✓	20.10.80 ✓	Amina Bashir D/O Bashir Khan ✓	Peshawar / 2 ✓	
355.	59 ✓	42 ✓	10.07.81 ✓	Nazima Bibi D/O Ali Asghar ✓	Abbottabad / 5 ✓	
356.	59 ✓	42 ✓	01.12.81 ✓	Shakeela Gul D/O Haji Eid Gul ✓	Karak / 4 ✓	
357.	59 ✓	42 ✓	15.06.82 ✓	Gul Naz D/O Muhammad France ✓	Swabi / 2 ✓	
358.	59 ✓	42 ✓	14.10.82 ✓	Bibi Ayesha D/O Hamesh Gul ✓	Charsadda / 2 ✓	
359.	59 ✓	42 ✓	27.08.83 ✓	Wajiha Kokab D/O Hayat Ullah Khan ✓	DI Khan / 4 ✓	
360.	59 ✓	42 ✓	05.01.85 ✓	Aliya Altaf D/O Muhammad Altaf Qureshi ✓	Peshawar / 2 ✓	M
361.	59 ✓	42 ✓	01.02.85 ✓	Saima Anwar D/O Anwar Shah ✓	Nowshera / 2 ✓	
362.	59 ✓	41 ✓	02.02.78 ✓	Shahida Parveen D/O Muhammad Banaras Khan ✓	Haripur / 5 ✓	
363.	59 ✓	41 ✓	01.01.84 ✓	Sobia Naz D/O Ghazanfar Ali ✓	Haripur / 5 ✓	
364.	59 ✓	40 ✓	19.11.75 ✓	Kausar Parveen D/O Ali Muhammad Sabir ✓	DI Khan / 4 ✓	M
365.	59 ✓	40 ✓	05.03.76 ✓	Rehana Aman D/O Aman Ullah Khan ✓	DI Khan / 4 ✓	M
366.	59 ✓	40 ✓	20.03.77 ✓	Neelofar D/O Muhammad Azeem ✓	Mansehra / 5 ✓	
367.	59 ✓	40 ✓	20.01.78 ✓	Safia Bibi D/O Nazar Hussain ✓	DI Khan / 4 ✓	
368.	59 ✓	40 ✓	28.03.79 ✓	Riffat Bibi D/O Gul Raees ✓	Lakki Marwat / 4 ✓	M
369.	59 ✓	40 ✓	01.05.79 ✓	Khush Niaz D/O Haji Malang Khan ✓	DI Khan / 4 ✓	
370.	59 ✓	40 ✓	19.07.79 ✓	Hussan Ara D/O Umar Daraz Khan ✓	Karak / 4 ✓	M
371.	59 ✓	40 ✓	24.02.80 ✓	Shamaila Ali D/O Sher Ali Khan Khattak ✓	Karak / 4 ✓	M
372.	59 ✓	40 ✓	30.01.81 ✓	Syeda Saima Mumtaz D/O Syed Liaqat Ali Shah ✓	Kohat / 4 ✓	
373.	59 ✓	40 ✓	23.04.81 ✓	Tahira Latif D/O Abdul Latif Khan ✓	Abbottabad / 5 ✓	
374.	59 ✓	40 ✓	20.05.81 ✓	Zahida Shamim D/O Dure Iman ✓	Abbottabad / 5 ✓	
375.	59 ✓	40 ✓	03.09.81 ✓	Saira Tabassum D/O Amir Sultan ✓	Swabi / 2 ✓	
376.	59 ✓	40 ✓	01.04.82 ✓	Humira Nazneen D/O Muhammad Sarfaraz Khan ✓	Swabi / 2 ✓	
377.	59 ✓	40 ✓	14.08.84 ✓	Ayesha Sanam D/O Sana Ullah Khan ✓	Kohat / 4 ✓	M
378.	59 ✓	40 ✓	08.09.84 ✓	Salma Naheed D/O Aman Ullah Khan ✓	DI Khan / 4 ✓	M
379.	59 ✓	40 ✓	06.12.84 ✓	Rahana Tabassum D/O Muhammad Younis ✓	Kohat / 4 ✓	M
380.	59 ✓	40 ✓	04.03.87 ✓	Mumtaz D/O Wali Zar Khan ✓	DI Khan / 4 ✓	
381.	59 ✓	39 ✓	28.03.75 ✓	Nasreen Akhtar D/O Mumtaz Ali Khan ✓	Karak / 4 ✓	M
382.	59 ✓	39 ✓	04.04.78 ✓	Bushra Begum D/O Nawab Ali Durrani ✓	Nowshera / 2 ✓	
383.	59 ✓	39 ✓	03.07.78 ✓	Samina Begum D/O Banat Gul ✓	Charsadda / 2 ✓	
384.	59 ✓	39 ✓	04.12.78 ✓	Nargis Naheed Bibi D/O Ghulam Said ✓	Mardan / 2 ✓	
385.	59 ✓	39 ✓	02.11.80 ✓	Mussarrat Noureen D/O Muhammad Rafiq ✓	Karak / 4 ✓	
386.	59 ✓	39 ✓	20.08.81 ✓	Farida D/O Masal Khan ✓	Charsadda / 2 ✓	
387.	59 ✓	39 ✓	08.04.82 ✓	Farzana D/O Jehanzeb ✓	Mardan / 2 ✓	M
388.	59 ✓	39 ✓	19.08.82 ✓	Sobia Afzal Khan D/O Muhammad Afzal Khan ✓	Mansehra / 5 ✓	
389.	59 ✓	39 ✓	27.02.83 ✓	Asia Taj D/O Taj Muhammad Khan ✓	Mardan / 2 ✓	
390.	59 ✓	39 ✓	24.03.83 ✓	Bibi Fakhria Malka D/O Qari Aziz Ullah ✓	Nowshera / 2 ✓	M

391	59	39	02.06.84	Shagufta Perveen D/O Habib ur Rehman	Karak / 4
392	59	39	25.12.84	Sadaf Bano D/O Yousaf Ali	Bannu / 4
393	59	39	26.09.85	Fatima Syed Shah D/O Syed Roidar Shah	Peshawar / 2
394	59	39	08.07.86	Umlaila Afsar Khan D/O Muhammad Afsar Khan	Abbottabad / 5
395	59	39	08.04.87	Bushra Bibi D/O Sultan Ahmad	DI Khan / 4
396	59	38	08.08.78	Sehrish Khan D/O Biradar Khan	Mansehra / 5
397	59	38	16.03.80	Saima Ayub D/O Haji Muhammad Ayub	Abbottabad / 5
398	59	38	01.10.80	Rehana Iqbal D/O Muhammad Iqbal	DI Khan / 4
399	59	38	07.09.81	Saira bibi D/O Zik Rur Rehman	Haripur / 5
400	59	38	10.02.83	Kalsoom Bibi D/O Ali Mar Jan	Lakki Marwat / 4
401	59	38	11.04.84	Basmah Gul D/O Haji Sana Ullah	DI Khan / 4
402	59	37	15.04.81	Syeda Sadaf Rubab D/O Syed Shah Nawaz Hussain Shah	Haripur / 5
403	59	37	01.01.83	Bushra Ishaq D/O Muhammad Ishaq	Malakand Agency / 3
404	59	36	15.02.80	Romana Zareen D/O Mir Kabul Khan	Bannu / 4
405	58	42	01.03.73	Amina Azam D/O Said Azam	Peshawar / 2
406	58	42	17.04.80	Shamshad Hamid D/O Hamid Ullah Khan	Lakki Marwat / 4
407	58	40	12.04.71	Nighat Nisar D/O Mohabat Khan	Abbottabad / 5
408	58	40	01.09.76	Mehnaz Hassan D/O Muhammad Hassan Shah	DI Khan / 4
409	58	40	16.12.77	Yasmeen Akhtar D/O Akbar Din	Abbottabad / 5
410	58	40	22.02.80	Sadia Raza D/O Zahid Raza Khan	Kohat / 4
411	58	40	28.02.80	Rukhsana Begum D/O Ghulam Daud Khan	Lakki Marwat / 4
412	58	40	01.01.81	Kalsoom Bibi D/O Syed Sher Ali Shah	S.W Agency / 1
413	58	40	10.03.82	Rehana Bibi D/O Mir Salam Khan	Bannu / 4
414	58	40	29.10.82	Nasreen Akbar D/O Akbar Ali Khan	Tank / 4
415	58	40	16.01.83	Raham Bano D/O Noor Ullah Khan	Karak / 4
416	58	40	01.02.84	Halima Majid D/O Abdul Majid	UDA Mansehra / 3
417	58	40	01.12.85	Shabana D/O Haji Rabnawaz Khan	DI Khan / 4
418	58	40	08.05.86	Ayesha Hashim D/O Muhammad Hashim Khan	Battagram / 3
419	58	40	03.08.86	Shakila Naz D/O Nek Muhammad	FR Bannu
420	58	40	19.03.87	Afshan Aslam D/O Muhammad Aslam	Lakki Marwat / 4
421	58	39	19.04.77	Shahida Mustafa D/O Ghulam Mustafa	Abbottabad / 5
422	58	39	08.11.79	Bibi Hajira D/O Sahib Zada	Charsadda / 2
423	58	39	02.02.81	Yasmeen Bibi D/O Ashraf Khan	Haripur / 5
424	58	39	23.03.81	Tahira Yasmin D/O Sher Khan ud Din	Karak / 4
425	58	39	17.04.81	Naheed Sarfaraz Khan D/O Sarfraz Khan	Lakki Marwat / 4
426	58	39	25.09.81	Tosia Anwar D/O Muhammad Anwar Khan	Haripur / 5
427	58	39	25.03.82	Farhana Gul D/O Israr ul Haq	Charsadda / 2
428	58	39	14.04.82	Sadaf Zahoor D/O Malik Zahoor Ahmad	Abbottabad / 5
429	58	39	20.05.82	Uzma Khan Qureshi D/O Lal Khan Qureshi	Abbottabad / 5
430	58	39	14.06.82	Aqila D/O Fayaz Ali Durrani	Charsadda / 2
431	58	39	05.08.82	Tahira Shaheen D/O Zar Dad Khan	Abbottabad / 5
432	58	39	04.09.82	Saima Hanif D/O Muhammad Hanif	DI Khan / 4
433	58	39	12.03.83	Shahana Bashir D/O Bashir Muhammad	Swabi / 2

434	58	39	15.03.83	Nosheen Nasir D/O Muhammad Nasir	DI Khan / 4
435	58	39	03.12.83	Gul Naz D/O Sher Nawab	Mardan / 2
436	58	39	04.04.84	Aziza Sadaf D/O Aziz Ullah	Chitral / 3
437	58	39	06.09.84	Mehnaz Kishwar D/O Kishwar Muhammad	Swabi / 2
438	58	39	11.10.84	Saima D/O Mudaser Shah	Swabi / 2
439	58	39	29.12.85	Shaiza Bibi D/O Muhammad Younas	Haripur / 5
440	58	39	23.01.86	Rabail Sajjad D/O Sajjad Hussain Shah	DI Khan / 4
441	58	39	28.03.86	Taskeen Sibghat D/O Sibghat Ullah	FR Tank / 1
442	58	38	10.04.66	Shamim Akhtar Jafri D/O Nazir Ahmad	Mansehra / 5
443	58	38	22.03.71	Syeda Rabia Naqvi D/O Syed Shah Hanif	Abbottabad / 5
444	58	38	02.02.72	Tahira Bano D/O Qazi Abdul Ghaffar	DI Khan / 4
445	58	38	10.05.72	Husna Deedar Gul D/O Deedar Gul	Charsadda / 2
446	58	38	02.01.75	Shagufta Begum D/O Raees Khan	Kohat / 4
447	58	38	31.08.77	Gulnaz Miskeen Khan D/O Muhammad Miskeen Khan	Mansehra / 5
448	58	38	18.03.78	Bibi Zahida D/O Muqarrab Khan	Karak / 4
449	58	38	10.04.78	Kausar Khalil D/O Khalil Ahmad	Nowshera / 2
450	58	38	12.08.78	Fouzia Noreen D/O Baha ud Din	Karak / 4
451	58	38	31.08.78	Shahnaz Parveen D/O Muhammad Yaqub Tabassum	DI Khan / 4
452	58	38	08.03.79	Shahida Bukhari D/O Sayed Iqbal Hussain Shah	DI Khan / 4
453	58	38	05.01.80	Ruqayya Bibi D/O Nazar Hussain	DI Khan / 4
454	58	38	05.03.80	Firdous Shireen D/O Muhammad Ayaz Shireen	Karak / 4
455	58	38	02.09.80	Azra Rafiq D/O Muhammad Rafiq	Kohat / 4
456	58	38	01.01.81	Meraj un Nisa D/O Said Wali Khan	Chitral / 3
457	58	38	08.03.81	Abida Sultana D/O Nazir Khan	Karak / 4
458	58	38	03.04.81	Saira Aman D/O Malik Aman Abbasi	Abbottabad / 5
459	58	38	26.08.81	Touseef Muslim D/O Qazi Muhammad Muslim	Abbottabad / 5
460	58	38	10.03.82	Saima Nosheen D/O Muhammad Yousaf	Mansehra / 5
461	58	38	01.04.82	Shabana Khanum D/O Asghar Ali	DI Khan / 4
462	58	38	01.04.82	Shahida Saddique D/O Muhammad Saddique	Mansehra / 5
463	58	38	02.05.82	Noreen Shah D/O Shah Dullah	Mardan / 2
464	58	38	23.05.82	Syeda Nadia Hussain D/O Syed Shah Hussain	Abbottabad / 5
465	58	38	14.02.83	Shaista Tabassum D/O Alyas Khan	Abbottabad / 5
466	58	38	03.02.84	Sidra Farid D/O Farid Khan	Haripur / 5
467	58	38	10.03.84	Akhtar Nisa D/O Yousaf Khan	Lakki Marwat / 4
468	58	38	01.07.84	Aasiya Habiba D/O Hameed ud Din Ahmad	Mardan / 2
469	58	38	06.02.85	Aalia Samreen D/O Muhammad Akbar	DI Khan / 4
470	58	38	19.08.85	Rashda Saher Afroz D/O Abdur Rehman Khan	DI Khan / 4
471	58	38	06.06.86	Amara Nasir D/O Muhammad Nasir Khan	DI Khan / 4
472	58	37	01.01.71	Sabiha Shaheen D/O Malik Banaras	Haripur / 5
473	58	37	06.06.77	Shazia Gul D/O Shams ud Din	Mansehra / 5
474	58	37	05.08.79	Nighat Noreen D/O Noor Khan	Tank / 4
475	58	37	21.02.80	Sadiqa Kiani D/O Raja Muhammad Sadiq	Haripur / 5
476	58	37	05.04.80	Shazia Ambreen D/O Abdul Raheem	DI Khan / 4

477	58	37	12.04.83	Asma D/O Mir Afsar	Abbottabad / 5
478	58	37	03.06.84	Shamim Gul Chaman D/O Gul Chaman	Peshawar / 2
479	58	36	29.09.77	Saeeda Akhtar Khattak D/O Muhammad Gul	Karak / 4
480	58	36	09.05.78	Nadia Iram D/O Muzaffar Khan	Abbottabad / 5
481	58	36	15.03.79	Shabnam Zeb D/O Dildar Khan	Peshawar / 2
482	58	36	25.03.79	Irum Jabeen D/O Syed Zakir Hussain Shah	Abbottabad / 5
483	58	36	01.04.80	Naheeda Parveen D/O Gul Khanadin	Karak / 4
484	58	36	16.11.81	Ansa Yunas D/O Muhammad Yunas Khan	Bannu / 4
485	58	36	10.02.83	Safia Bibi D/O Daud Khan	Charsadda / 2
486	58	36	05.08.83	Shazia Naheed D/O Muhammad Subhan Shah	Bannu / 4
487	58	36	02.12.84	Somy Gul D/O Gul Faraz	Mardan / 2
488	58	36	02.02.85	Sadia Parveen D/O Ghulam Rafique	Abbottabad / 5
489	58	36	27.03.85	Hina Gul D/O Muhammad Aslam Khan	Bannu / 4
490	58	36	22.04.85	Fatima Naz D/O Sultan e Rome	Malakand Agency / 3
491	57	41	15.04.74	Sajeela Tazeen D/O Faiz Ullah	DI Khan / 4
492	57	41	06.07.85	Sumaira Ghaffar D/O Abdul Ghaffar	Abbottabad / 5
493	57	40	15.01.80	Sadia Snober D/O Muhammad Khan	DI Khan / 4
494	57	40	19.05.81	Sidra D/O Muhammad Riaz	Abbottabad / 5
495	57	40	01.07.81	Shehnaz Bibi D/O Nisar Muhammad	Mohmand Agency / 1
496	57	40	01.04.82	Nasreen Zaman D/O Ali Zaman	Karak / 4
497	57	40	15.12.82	Kulsoom Jamil D/O Jamil Khan	Mohmand Agency / 1
498	57	40	05.01.83	Tasneem Akhtar D/O Muhammad Sadiq	DI Khan / 4
499	57	40	04.07.83	Noreen Ismail D/O Muhammad Ismail	Peshawar / 2
500	57	40	12.09.83	Bibi Aisha D/O Sabir Rahman	Bajaur Agency / 1
501	57	40	24.02.84	Khola Irum D/O Khizer Ahmed Mirza	Bannu / 4
502	57	40	23.03.84	Sehrish D/O Sultan Ahmad	Mohmand Agency / 1
503	57	40	27.10.84	Shahnaz Bibi D/O Muhammad Ismail Khan	DI Khan / 4
504	57	40	15.03.85	Sajida Awaz D/O Muhammad Awaz Khan	S.W Agency / 1
505	57	40	05.09.85	Naila Nazir D/O Muhammad Nazir	Abbottabad / 5
506	57	39	03.06.76	Waqar un Nisa D/O Saad Ullah Khan	Tank / 4
507	57	39	24.07.76	Fauzia Khanum D/O M. Faiz Ullah Khan	Lakki Marwat / 4
508	57	39	02.04.78	Sheema Yaqub D/O Yaqub Ali	Dir / 3
509	57	39	10.09.78	Shabana Bibi D/O Muhammad Saeed	Haripur / 5
510	57	39	20.03.79	Amina Begum D/O Haji Mukhtar Ali	Kurram Agency / 1
511	57	39	10.10.79	Nighat D/O Said Karim	Mardan / 2
512	57	39	17.03.80	Iffat Hashmi D/O Akhtar Saleem Shah	DI Khan / 4
513	57	39	23.03.80	Samina Pervez D/O Shah Pervez	Charsadda / 2
514	57	39	08.11.81	Abira Gohar D/O Gohar Rahman	Peshawar / 2
515	57	39	23.11.81	Azra Amir D/O Amir Bashar Khan	Mohmand Agency / 1
516	57	39	31.01.83	Shabana Bibi D/O Masood Khan	Haripur / 5
517	57	39	05.02.83	Sadia D/O Sher Dil	Abbottabad / 5
518	57	39	10.02.83	Fatima Liaqat D/O Liaqat Ali	Peshawar / 2
519	57	39	01.03.83	Farhat Qureshi D/O Tayyab Jan	Mardan / 2
520	57	39	12.04.83	Rafaqat Shafiq D/O Muhammad Shafiq	Nowshera / 2

521.	57	39	25.04.83	Yasmeen D/O Sultan Ali	Mansehra / 5
522.	57	39	01.06.83	Uzma D/O Muhammad Suleman	Swat / 3
523.	57	39	10.01.84	Nilofar D/O Ajab Khan	Nowshera / 2
524.	57	39	14.03.84	Raveeda D/O Nazir Muhammad	Mardan / 2
525.	57	39	18.04.84	Paghunda Hakeem D/O Fazli Hakeem	Swabi / 2
526.	57	39	14.08.84	Sarwat D/O Misal Khan	Mardan / 2
527.	57	39	12.09.84	Naheed Samad D/O Abdul Samad	Mardan / 2
528.	57	39	26.02.86	Asma Gul D/O Atta Ullah	Malakand Agency / 3
529.	57	39	07.07.86	Sidra Loni D/O Dur Muhammad Loni	DI Khan / 4
530.	57	39	01.01.87	Mehtab Saeed D/O Saeed ud Din Khan	Dir / 3
531.	57	39	14.08.87	Sawaira Khan D/O Badshah Khan	Mohmand Agency / 1
532.	57	39	07.09.87	Hadia Saeed D/O Muhammad Saeed	Peshawar / 2
533.	57	38	15.04.73	Safina Anjum Shinwari D/O Muhammad Shuja	Kohat / 4
534.	57	38	01.12.73	Zille Huma D/O Syed Gulzar Hussain Shah	Abbottabad / 5
535.	57	38	13.12.75	Tahira Aslam D/O Muhammad Aslam	Karak / 4
536.	57	38	20.11.76	Zubaida Razaq D/O Fazal Razaq	Peshawar / 2
537.	57	38	04.09.77	Shaheen Akhtar D/O Gul Sawab Khan	Karak / 4
538.	57	38	06.02.78	Shazia Begum D/O Shah Jehan	Swabi / 2
539.	57	38	25.05.81	Azra Jabeen D/O Muhammad Sharif	Mardan / 2
540.	57	38	20.03.82	Bushra Faiz D/O Faiz Rasul	DI Khan / 4
541.	57	38	21.04.82	Salma Ghaffar D/O Abdul Ghaffar	Bannu / 4
542.	57	38	22.02.83	Shaima Perveen D/O Muhammad Afnan	Lakki Marwat / 4
543.	57	38	03.09.83	Saima Gul D/O Malik Muhammad Ayub	Haripur / 5
544.	57	38	30.04.84	Nazia Azmeem D/O Abdul Waheed	Orakzai Agency / 1
545.	57	38	13.04.85	Nazafat Yasmin D/O Syed Saad Ullah Khan	Lakki Marwat / 4
546.	57	38	20.05.85	Fatima Bibi D/O Fazal Dad	Mansehra / 5
547.	57	38	01.02.86	Faiza D/O Mutahir Shah	Peshawar / 2
548.	57	38	02.06.87	Sehrish Saba D/O Abdul Ghaffar Joya	DI Khan / 4
549.	57	37	01.01.74	Yasmin D/O Ghulam Akbar	Mansehra / 5
550.	57	37	01.01.78	Bibi Zahida D/O Shafi uz Zaman	FR Bannu / 1
551.	57	37	27.10.79	Nazia Azim D/O Fazal Azim	Swat / 3
552.	57	37	01.04.81	Neelam Kausar D/O Rahmat Shah	Malakand Agency / 3
553.	57	37	12.03.82	Shaista Bibi D/O Suleman	Abbottabad / 5
554.	57	37	23.03.83	Saiqa D/O Aurang Zaib	Mansehra / 5
555.	57	37	31.03.83	Iram Khan D/O Azam Khan	Kohat / 4
556.	57	37	16.04.83	Shadmana Kiran D/O Khaliq Dad Khan Wazir	FR Bannu / 1
557.	57	37	13.06.83	Sidra Yasmin D/O Jan Ali	Charsadda / 2
558.	57	37	30.01.84	Safoora Khaton D/O Muhammad Faridoon Khan	Mansehra / 5
559.	57	37	04.02.85	Sadia Iqbal D/O Muhammad Iqbal	Haripur / 5
560.	57	37	15.03.85	Rahila Mahsud D/O Loi Khan	S.W Agency / 1
561.	57	37	23.03.85	Asma Khan D/O Abdul Ghafoor Khan	Bannu / 4
562.	57	37	11.04.85	Khalida Ferdos D/O Gul Rasool Shah	Karak / 4
563.	57	37	18.12.85	Mahwish Khan D/O Fakhr ul Islam	Haripur / 5
564.	57	37	28.04.86	Samra Sherazi D/O Syed Mubarak Ali Shah	Mansehra / 5

565.	57 ✓	36 ✓	05.05.73 ✓	Sadaf Zareen D/O Abdul Momin ✓	Abbottabad / 5 ✓
566.	57 ✓	36 ✓	01.01.79 ✓	Kishwar Ajmal D/O Muhammad Ajmal ✓	Lakki Marwat / 4 ✓
567.	57 ✓	36 ✓	01.01.79 ✓	Rukhshad D/O Raza Ali Shah ✓	Bannu / 4 ✓
568.	57 ✓	36 ✓	03.03.79 ✓	Kalsoom Siraj D/O Siraj ul Haq ✓	Swat / 3 ✓
569.	57 ✓	36 ✓	10.08.79 ✓	Attia Gul D/O Mir Badsha ✓	Tank / 4 ✓
570.	57 ✓	36 ✓	03.03.81 ✓	Basmeen D/O Hazrat Ullah ✓	Nowshera / 2 ✓
571.	57 ✓	36 ✓	26.04.81 ✓	Kiran Fatima D/O Muhammad Saleem ✓	DI Khan / 4 ✓
572.	57 ✓	36 ✓	11.04.82 ✓	Saira Ismail D/O Muhammad Ismail ✓	Abbottabad / 5 ✓
573.	57 ✓	36 ✓	02.06.82 ✓	Uzma Shaheen D/O Abdul Jalil ✓	Abbottabad / 5 ✓
574.	57 ✓	36 ✓	05.10.82 ✓	Ammara Mahsood D/O Din Ghulam ✓ Mahsood	S.W Agency / 1 ✓
575.	57 ✓	36 ✓	11.04.83 ✓	Aftab Bibi D/O Spin Gul ✓	Bannu / 4 ✓
576.	57 ✓	36 ✓	28.04.83 ✓	Tania Abid D/O Abid Gul ✓	Hangu / 4 ✓
577.	57 ✓	36 ✓	22.05.83 ✓	Shalla Zahir D/O Muhammad Zahir Shah ✓	Charsadda / 2 ✓
578.	57 ✓	36 ✓	05.02.84 ✓	Shama Afsheen D/O Muhammad Sharif ✓ Khan	Nowshera / 2 ✓
579.	57 ✓	36 ✓	05.05.84 ✓	Khyrun Nesa D/O Amir Ali Shah ✓	Bannu / 4 ✓
580.	57 ✓	36 ✓	15.04.85 ✓	Hasina Kiran D/O Ismail Khan ✓	Bannu / 4 ✓
581.	57 ✓	36 ✓	08.08.87 ✓	Fatima Khan D/O Muhammad Yasin Khan ✓	Bannu / 4 ✓
582.	56 + 40	40	29.02.83 ✓	Bushra D/O Atta Ullah Shah ✓	S.W Agency / 1 ✓
583.	56 ✓	40 ✓	12.10.84 ✓	Andaleeb Qaisar D/O Qaisar Khan ✓	Haripur / 5 ✓
584.	56 ✓	39 ✓	30.05.75 ✓	Bibi Alia D/O Ali Nawaz ✓	Chitral / 3 ✓
585.	56 ✓	39 ✓	13.01.76 ✓	Nighat Begum D/O Sahib Gul ✓	Mardan / 2 ✓
586.	56 ✓	39 ✓	14.04.80 ✓	Tahira Bibi D/O Fazal Akbar ✓	Malakand Agency / 3 ✓
587.	56 ✓	39 ✓	15.04.80 ✓	Parveen Begum D/O Rahim Jan ✓	Lakki Marwat / 4 ✓
588.	56 ✓	39 ✓	10.03.82 ✓	Nafees Begum D/O Ameer Noshad ✓	Malakand Agency / 3 ✓
589.	56 ✓	39 ✓	06.09.83 ✓	Salma Bibi D/O Sher Farzand ✓	Malakand Agency / 3 ✓
590.	56 ✓	39 ✓	28.02.84 ✓	Wajiha Hajab D/O Abdul Rab Nishtar ✓	Abbottabad / 5 ✓
591.	56 ✓	39 ✓	23.03.84 ✓	Neelam D/O Asghar Ali ✓	Swabi / 2 ✓
592.	56 ✓	39 ✓	02.12.84 ✓	Attia Gul D/O Gulzar Ahmad ✓	Peshawar / 2 ✓
593.	56 ✓	39 ✓	21.12.84 ✓	Zahida Parveen D/O Munawar Khan ✓	Karak / 4 ✓
594.	56 ✓	39 ✓	15.04.85 ✓	Naima Amin D/O Amin Khan ✓	Nowshera / 2 ✓
595.	56 ✓	39 ✓	13.12.85 ✓	Ommi Kalsoom D/O Noor Akbar ✓	Mardan / 2 ✓
596.	56 ✓	39 ✓	04.04.86 ✓	Reshma D/O Abdullah ✓	Malakand Agency / 3 ✓
597.	56 ✓	39 ✓	06.09.86 ✓	Muntasireen D/O Abdul Ghayas Khan ✓	Chitral / 3 ✓
598.	56 ✓	38 ✓	18.07.70 ✓	Saima Khalil D/O Khalil ur Rehman ✓	Abbottabad / 5 ✓
599.	56 ✓	38 ✓	10.03.77 ✓	Bibi Rabia D/O Hamd Ullah ✓	Dir / 3 ✓
600.	56 ✓	38 ✓	18.03.79 ✓	Shaista Habib D/O Habib ur Rehman ✓	Mansehra / 5 ✓
601.	56 ✓	38 ✓	08.01.81 ✓	Sabila Begum D/O Subhan Ali Shah ✓	Bannu / 4 ✓
602.	56 ✓	38 ✓	12.12.81 ✓	Imtiaz Mukhtar D/O Mukhtar Ahmad ✓	Mohmand Agency / 1 ✓
603.	56 ✓	38 ✓	18.09.82 ✓	Saima Masroor D/O Syed Masroor ✓ Hussain Shah	Haripur / 5 ✓
604.	56 ✓	38 ✓	03.04.83 ✓	Anub-u-Nisa D/O Muhammad Shamim ✓ Khan	FR Bannu / 1 ✓
605.	56 ✓	38 ✓	03.10.83 ✓	Seema Khan D/O Muhammad Israil Khan ✓	Bannu / 4 ✓
606.	56 ✓	38 ✓	02.02.85 ✓	Tahira Jabeen D/O Muhammad Ashraf ✓	Mansehra / 5 ✓
607.	56 ✓	38 ✓	15.04.85 ✓	Sumera Begum D/O Ihsan Ullah Khan ✓	Bannu / 4 ✓
608.	56 ✓	38 ✓	05.05.85 ✓	Shehla Kanwal D/O Muhammad Aslam ✓	DI Khan / 4 ✓

609	56	38	15.06.85	Sajjad Begum D/O Amir Sahib Khan	Karak / 4	
610	56	38	18.03.87	Ambareen D/O Zar Wali Khan	Lakki Marwat / 4	
611	56	37	10.02.74	Sadia Bano D/O Mushtaq Ahmad	Mansehra / 5	
612	56	37	04.02.75	Saima Miskeen D/O Muhammad Miskeen	Mansehra / 5	
613	56	37	15.02.76	Samara Bibi D/O Fareed Muhammad	Haripur / 5	
614	56	37	06.04.77	Sarwat Munir D/O Munir Gul	Bajaur Agency / 1	
615	56	37	14.05.79	Shazia Bibi D/O Hafeez ur Rehman	Abbottabad / 5	
616	56	37	05.06.79	Sadia Bibi D/O Abdul Karim	Abbottabad / 5	
617	56	37	14.10.79	Kanwal Kaleem D/O Aley Ahmad Kaleem	Kurram Agency / 1	
618	56	37	18.10.80	Rahila Anjum D/O Zafar Ali	DI Khan / 4	
619	56	37	08.04.81	Tahira Jabeen D/O Muhammad Ishaq	Abbottabad / 5	
620	56	37	28.08.81	Yasmeen D/O Sarfaraz Khan	Mardan / 2	
621	56	37	01.03.82	Saima Sardar D/O Sardar Muhammad	Mansehra / 5	
622	56	37	18.04.82	Sumera Naz D/O Mujib ur Rehman	FR Bannu / 1	
624	56	37	17.08.82	Nousheen Saleem D/O Saleem Gul Akhtar	DI Khan / 4	
624	56	37	01.12.82	Sahira Mushal D/O Muhammad	Mansehra / 5	
625	56	37	10.01.83	Shabnum Gul D/O Shah Alam Khan	Lakki Marwat / 4	
626	56	37	25.11.84	Bibi Salma D/O Abdul Khanan	Mansehra / 5	
627	56	37	01.02.85	Sobia Haq D/O Anwar ul Haq	Swabi / 2	
628	56	37	07.04.85	Bibi Ruqia D/O Izat Khan	Lakki Marwat / 4	
629	56	37	15.01.86	Sumaira Gul D/O Gul Zaman Khan	Abbottabad / 5	
630	56	36	01.05.72	Shahida Nasreen D/O Hameed Ullah Sayal	DI Khan / 4	
631	56	36	14.05.75	Dilshad Begum D/O Aman Ullah	DI Khan / 4	
632	56	36	08.04.76	Shahida Jillani D/O Ghulam Jillani	Haripur / 5	
633	56	36	21.07.76	Parveen Yaqoob D/O Yaqoob Khan	Dir / 3	
634	56	36	01.01.77	Iffat Ara D/O Shah Pasand Khan	Mardan / 2	
635	56	36	01.02.77	Hidayat D/O Sher Ali Khan	Swat / 3	
636	56	36	07.08.78	Ayesha Siddiqia D/O Khair ul Aman	Charsadda / 2	
636	56	36	15.12.78	Farhat Yasmin D/O Sardar Muhammad	Kohat / 4	
638	56	36	01.01.79	Alzibat Shaheen D/O Irfan Ullah	Swabi / 2	
639	56	36	01.01.79	Nosheen Akhtar D/O Falak Naz Khan	Bannu / 4	
640	56	36	22.04.79	Shahida Khalil D/O Khalil ur Rehman	Abbottabad / 5	
641	56	36	24.06.79	Ishrat Jahan D/O Jehan Gul	Karak / 4	
642	56	36	01.01.80	Shakeela Bibi D/O Molvi Habib ur Rehman	UDA Mansehra / 3	
643	56	36	01.01.80	Samina Bibi D/O Raza Muhammad	Abbottabad / 5	
644	56	36	20.02.80	Nazneen Begum D/O Muhammad Aslam Khan	Bannu / 4	
645	56	36	01.04.80	Ghazala Yasmin D/O Nisar Yousaf	Mardan / 2	
646	56	36	08.04.80	Amina Bibi D/O Bakhtyar	Swat / 3	
647	56	36	12.04.80	Akhair un Nisa D/O Muhammad Hashim	Karak / 4	
648	56	36	15.04.80	Shabana Gul Nawaz D/O Gul Nawaz	Lakki Marwat / 4	
649	56	36	15.06.80	Akhtar un Nisa D/O Rais Khan	Lakki Marwat / 4	AW
650	56	36	01.01.81	Mufeed Begum D/O Shams ur Rehman	Mardan / 2	
651	56	36	10.01.81	Palwasha Gauhar D/O Ali Gauhar	Mardan / 2	
652	56	36	11.02.81	Anwar Zia D/O Imam Jan	Swabi / 2	
653	56	36	03.03.81	Surayya Shaheen D/O Hussain Din	Haripur / 5	

654	56	36	15.03.81	Tahira Bibi D/O Zardad Khan	Abbottabad / 5	
655	56	36	15.04.81	Falak Naz D/O Ajbbar Khan	Dir / 3	
656	56	36	04.06.81	Nadia Iram D/O Muhammad Rafiq	DI Khan / 4	
657	56	36	20.07.81	Aaliya Marwat D/O Aman Ullah Khan	Lakki Marwat / 4	
658	56	36	17.08.81	Mehr Taj Bibi D/O Muhammad Latif Khan	Bannu / 4	
659	56	36	10.11.81	Nabila Gul D/O Gul Nawaz Khan	Bannu / 4	
660	56	36	02.04.82	Saadat Begum D/O Bakhtawar Shah	Mardan / 2	
661	56	36	22.05.82	Abida Majeed D/O Muhammad Abdul Majeed	Karak / 4	
662	56	36	10.07.82	Saba Zuhra D/O Nizam Ali	Kohat / 4	
663	56	36	12.12.82	Sadia Bano D/O Abdul Nazir	Abbottabad / 5	
664	56	36	01.01.83	Salma Jahid D/O Jahid Muhammad	Mardan / 2	
665	56	36	01.01.83	Amber D/O Hidayat Gul	Nowshera / 2	
666	56	36	01.04.83	Nusrat Jabeen D/O Abdul Karim	Chitral / 3	
667	56	36	01.04.83	Humera Begum D/O Rehan Ali	Kohat / 4	
668	56	36	04.11.83	Samina Akhtar D/O Muhammad Yaqub Khan	Lakki Marwat / 4	
669	56	36	04.11.83	Uzma Bibi D/O Muhammad Dauran	Haripur / 5	
670	56	36	01.01.84	Kawsar Parveen D/O Abdul Hamid	Swat / 3	
671	56	36	02.02.84	Haleema Naz D/O Mehboob Ahmad	Battagram / 3	c.c BSL
672	56	36	11.02.84	Syeda Yasmin Gul D/O Syed Qamar Ali Shah	Bannu / 4	
673	56	36	01.03.84	Shahida Begum D/O Banat Gul	Charsadda / 2	
674	56	36	20.03.84	Seema Nabi D/O Hazrat Nabi	Malakand Agency / 3	
675	56	36	25.03.84	Noor un Nisa D/O Rehmat Ullah Khan	Lakki Marwat / 4	
676	56	36	23.10.84	Seema Shafique D/O Shafique Hassan	Kohat / 4	
677	56	36	08.12.84	Rubina D/O Muhammad Khan	Swat / 3	
678	56	36	25.03.85	Iffat Ara D/O Taj Muhammad Khan	Karak / 4	
679	56	36	07.04.85	Yasmeen Bibi D/O Abid Hussain	Lakki Marwat / 4	
680	56	36	28.04.85	Faiza Afsheen D/O Momin Gul	Bannu / 4	
681	56	36	25.12.85	Saira Mushtaq D/O Mushtaq Ahmad	Haripur / 5	
682	56	36	03.01.86	Amara Zeb D/O Aurang Zeb Khan	Kohat / 4	
683	56	36	18.01.86	Rehana Bibi D/O Abdur Rehman	DI Khan / 4	
684	56	36	20.12.86	Raheela Parveen D/O Muhammad Baran	DI Khan / 4	
685	55	40	01.08.69	Shahnaz Begum D/O Ahmad Nawaz	DI Khan / 4	
686	55	40	27.12.84	Nuzhat Manan D/O Fazli Manan	Mohmand Agency / 1	
687	55	39	10.04.76	Shahnaz Bibi D/O Chiragh Ali Shah	Chitral / 3	
688	55	39	07.06.77	Farzana Begum D/O Sultan Room	Swat / 3	
689	55	39	01.03.78	Gulshan Bibi D/O Muhammad Khan	Dir / 3	
690	55	39	12.10.78	Aliya Attiq D/O Attique Ahmad	Swabi / 2	
691	55	39	24.12.78	Ambreen Johar D/O Syed Johar	Swabi / 2	
692	55	39	25.05.79	Nadia D/O Shamas Khan	Bajaur Agency / 1	
693	55	39	11.09.80	Bushra Jabeen D/O Fazal Wahid	Malakand Agency / 3	
694	55	39	05.10.81	Nighat Begum D/O Shams ul Islam	Swabi / 2	
695	55	39	15.04.84	Saiqa D/O Muhammad Siraj	Malakand Agency / 3	
696	55	39	26.06.84	Arifa Mushtaq D/O Mushtaq Ali Khan	Swabi / 2	
697	55	38	10.03.74	Minhas Afridi D/O Malik Tehmas Khan Afridi	FR Peshawar / 1	

698.	55	38	03.07.75	Shazia Naz D/O Sher Zada	Mohmand Agency / 1
699.	55	38	21.07.75	Imrana Hashim D/O Zaffar Hussain	DI Khan / 4
700.	55	38	07.12.77	Sameena Shaheen D/O Muhammad Ramzan	DI Khan / 4
701.	55	38	02.03.81	Shaheer Bano D/O Syed Gulzar Hussain Shah	Haripur / 5
702.	55	38	12.04.81	Kanwal Yasmeen D/O Mufti Muhammad Tufail	Mohmand Agency / 1
703.	55	38	11.12.81	Shamsa Kanwal D/O Raja Phul Zeb	Haripur / 5
704.	55	38	05.01.82	Mehnaz Blbi D/O Taj Anwar	Kohat / 4
705.	55	38	16.11.82	Asma Noreen D/O Muhammad Hussain	Abbottabad / 5
706.	55	38	30.01.84	Nasra Rehman D/O Muhammad Rehman	Bannu / 4
707.	55	37	30.03.73	Robina Ismail D/O Muhammad Ismail	Bannu / 4
708.	55	37	25.12.75	Ejaz Begum D/O Abdul Majeed Khan	Mohmand Agency / 1
709.	55	37	01.02.80	Wasima D/O Wazir Zada	Mardan / 2
710.	55	37	30.06.80	Saleha Siddique D/O Muhammad Tayyab	Haripur / 5
711.	55	37	05.05.81	Taskeen Anjum D/O Syed Matloob Hussain Shah	Haripur / 5
712.	55	37	30.04.83	Sehrish Baig D/O Muhammad Sajid Baig	Abbottabad / 5
713.	55	37	01.01.84	Shumila Bibi D/O Fazal Dad	Haripur / 5
714.	55	37	20.04.84	Abida Dilnasheen D/O Turab Khan	Kurram Agency / 1
715.	55	37	01.03.85	Shazia Ilyas D/O Muhammad Ilyas	Abbottabad / 5
716.	55	37	12.05.85	Aisha Dayyan D/O Muhammad Dayyan	Bajaur Agency / 1
717.	55	37	15.04.86	Summaira Khurshid D/O Khurshid Alam	Haripur / 5
718.	55	37	25.11.86	Mahjabeen D/O Nazir Ahmad	Lakki Marwat / 4
719.	55	36	15.11.66	Yasmeen Begum D/O Wali Ahmad	Malakand Agency / 3
720.	55	36	28.07.70	Ishrat Amina D/O S. Hussain Ali Shah	Kohat / 4
721.	55	36	04.03.74	Yasmeen Akhtar D/O Muhammad Ishaq	Haripur / 5
722.	55	36	15.07.75	Saima Gul D/O Misbah ud Din	Malakand Agency / 3
723.	55	36	11.03.76	Surrayia Nourien D/O Fida Muhammad	Swabi / 2
724.	55	36	01.08.76	Sobia Bano D/O Muhammad Khalid	Abbottabad / 5
725.	55	36	10.01.77	Andaleeb Syed D/O Fazal Khaliq	Mardan / 2
726.	55	36	11.02.77	Nadia Ghani Khan D/O Abdul Ghani Khan	Dir / 3
727.	55	36	05.07.77	Samina D/O Safdar Ali Khan	Haripur / 5
728.	55	36	28.08.77	Shahida Elahi D/O Fazli Elahi	Peshawar / 2
729.	55	36	19.04.78	Nabila Safdar D/O Safdar Khan	Mardan / 2
730.	55	36	20.04.78	Fehmida Bibi D/O Shah Nawaz Khan	Bannu / 4
731.	55	36	10.01.79	Shahida Naz D/O Ghulam Sarwar	Nowshera / 2
732.	55	36	14.06.79	Nadia Wahab D/O Abdul Wahab	Nowshera / 2
733.	55	36	27.07.79	Mehnaz Zia D/O Zia ul Haq Zia	Mansehra / 5
734.	55	36	05.11.79	Ishrat Begum D/O Khan Zada	Charsadda / 2
735.	55	36	01.01.80	Farhat D/O Said Wali	Mardan / 2
736.	55	36	14.02.80	Humaira Nawaz D/O Muhammad Nawaz	Lakki Marwat / 4
737.	55	36	07.04.80	Sajida Samina Gul D/O Allah Bakhsh Awan	DI Khan / 4
738.	55	36	01.05.80	Bibi Aisha D/O Muhammad Khan	Swat / 3
739.	55	36	05.05.80	Shabana Manzoor D/O Manzoor Hussain	Peshawar / 2
740.	55	36	22.07.80	Mahreen Nisar D/O Nisar Ahmad	Kohat / 4
741.	55	36	27.12.80	Safia Kousar D/O Masti Khan	Lakki Marwat / 4

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742	55	36	18.03.81	Shabnum Sheikh D/O Sheikh Nasr Ullah Khan	Tank / 4	
743	55	36	12.04.81	Nusrat Begum D/O Mahabat Khan	Mardan / 2	
744	55	36	12.07.81	Shazia Bibi D/O Abdul Saattar	Swabi / 2	
745	55	36	01.01.82	Rabia Nawaz D/O Qayyum Nawaz Baloch	DI Khan / 4	
746	55	36	07.03.82	Bushra Farukh D/O Farukh Seer	Swabi / 2	
747	55	36	15.03.82	Sarwat Jabeen D/O Hakim Khan	Mardan / 2	
748	55	36	25.05.82	Farzana Samad D/O Abdul Samad	Peshawar / 2	
749	55	36	10.07.82	Samreen Begum D/O Rashid Nawaz	Bannu / 4	
750	55 ✓	36 ✓	06.12.82	Ghazala Afsar D/O Afsar Ali Khan ✓	Malakand Agency / 3 ✓	
751	55 ✓	36 ✓	29.12.82	Shakeel Bibi D/O Malik Aman ✓	UDA Mansehra / 3 ✓	
752	55 ✓	36 ✓	01.01.83	Farida Naz D/O Hazrat Jan ✓	Mohmand Agency / 1 ✓	
753	55	36	12.02.83	Naveeda Rozi D/O Bunair Khan	Chitral / 3 ✓	
754	55 ✓	36 ✓	04.03.83	Maqsood Rana D/O Abdul Baqi ✓	Chitral / 3 ✓✓	
755	55	36	01.04.83	Robina Gul D/O Rishab Gul	Karak / 4	
756	55	36	05.09.83	Faiza Qureshi D/O Ashraf Qureshi	Peshawar / 2	
757	55	36	09.09.83	Jahan Ara D/O Ghulam Qasim Khan	Lakki Marwat / 4	
758	55	36	20.09.83	Ummya Tabbasum D/O Abdul Waheed	DI Khan / 4	
759	55	36	04.10.83	Sheeba Gul D/O Jan Muhammad	Charsadda / 2	
760	55	36	11.11.83	Naila Rashid D/O Abdur Rashid	Karak / 4	
761	55	36	30.12.83	Sobia Bibi D/O Muhammad Amin	Haripur / 5	
762	55	36	01.01.84	Noshaba Hassan D/O Muhammad Hassan	Mansehra / 5	
763	55	36	28.01.84	Farhat Shaheen D/O Sahib Khan	Lakki Marwat / 4	
764	55	36	02.03.84	Pamila D/O Umar Nawaz Khan	Bannu / 4	
765	55 ✓	36 ✓	01.04.84	Irshad Bano D/O Ghulam Jilani ✓	Chitral / 3 ✓	
766	55	36	19.06.84	Neelma Khan D/O Hakim Khan	Mansehra / 5	
767	55	36	03.09.84	Lubna Saeed D/O Saeed Ullah Jan	Peshawar / 2	
768	55	36	20.11.84	Shabana Naz D/O Shah Jehan	Charsadda / 2	
769	55	36	01.01.85	Salma Latif D/O Abdul Latif	Charsadda / 2	
770	55 ✓	36 ✓	01.01.85	Salma Begum D/O Abdul Azeem ✓	Malakand Agency / 3 ✓	
771	55 ✓	36 ✓	22.02.85	Nageena D/O Muhammad Iqbal ✓	Mardan / 2 ✓	
772	55	36	25.03.85	Farhana Kausar D/O Muhammad Ishaq	DI Khan / 4	
773	55 ✓	36 ✓	10.04.85	Hidayat Bibi D/O Faridoon ✓	Malakand Agency / 3 ✓	
774	55	36	01.07.85	Safoora Rafiq D/O Muhammad Rafiq	Haripur / 5	
775	55	36	25.11.85	Salma Khan D/O Mashal Khan	Lakki Marwat / 4	
776	55	36	03.03.86	Faryal Latif D/O Latif Zaman	Bannu / 4	
777	55	36	18.05.86	Nosheen Akhtar D/O Muhammad Saleem	Mardan / 2	
778	55	36	27.09.86	Ghazala D/O Israr Habib	Mardan / 2	
779	55	36	04.11.86	Bilqees Bibi D/O Khaliq Dad	DI Khan / 4	
780	55	36	01.01.87	Rozina Begum D/O Noor Wali Khan	Bannu / 4	
781	55	36	26.07.87	Sehrish Yaqub D/O Muhammad Yaqub	Haripur / 5	
782	54 ✓	40 ✓	11.11.80	Shabana Atta D/O Atta Ullah Khan ✓	N.W Agency / 1 ✓	
783	54 ✓	39 ✓	06.11.79	Zahida Bibi D/O Sher Azam ✓	Chitral / 3 ✓	
784	54	38	10.02.85	Shabnam Jabeen D/O Sultan Muhammad	Haripur / 5	
785	54 ✓	37 ✓	01.01.78	Shabana Gul D/O Abdul Qayyum ✓	Haripur / 5 ✓	
786	54 ✓	37 ✓	26.08.78	Kalsoom D/O Abdur Rehman ✓	Dir / 3 ✓	

787	54	37	16.10.82	Bushra Bibi D/O Gul Ahmad	Malakand Agency / 3
788	54	37	10.02.83	Saima Iftikhar Abbasi D/O Iftikhar Ahmad Abbasi	Abbottabad / 5
789	54	37	11.10.83	Zeenat Shaheen D/O Khair ur Rahman	Bajaur Agency / 1
790	54	37	31.10.84	Zafrana D/O Shir Za Ali Khan	S.W Agency / 1
791	54	36	08.10.70	Fahmeeda Bano D/O Muhammad Darvaish	Dir / 3
792	54	36	01.01.71	Shamim Akhtar D/O Muhammad Hussain	Abbottabad / 5
793	54	36	01.07.72	Gul NAz D/O Sakhawat Hussain Shah	DI Khan / 4
794	54	36	26.03.73	Ishrat Jamshid D/O Jamshid Ali	Swat / 3
795	54	36	15.04.73	Shagufta Begum D/O Imran Muhammad	Mohmand Agency / 1
796	54	36	29.04.73	Chand Mehraj D/O Jamal ud Din Qureshi	Mansehra / 5
797	54	36	19.10.74	Yasmin Hasham D/O Hasham Khan	Malakand Agency / 3
798	54	36	10.10.75	Robina Naz D/O Faqir Dad Bangash	Bannu / 4
799	54	36	01.01.76	Jamila Khanum D/O Syed Muhammad	S.W Agency / 1
800	54	36	02.09.76	Fazeelat Noreen D/O Ashiq ur Rehman	Peshawar / 2
801	54	36	01.03.77	Rifat Ara D/O Ameer Nawaz Khan	Dir / 3
802	54	36	26.03.78	Gultaj Parveen D/O Khair ud Din	Chitral / 3
803	54	36	04.09.78	Fozia Siraj D/O Siraj ud Din	DI Khan / 4
804	54	36	10.01.79	Bibi Almas D/O Sher Muhammad	Swat / 3
805	54	36	18.12.79	Malika Benazir D/O Salim Khan	Chitral / 3
806	54	36	20.12.79	Surriya Bibi D/O Umar Khatab	Haripur / 5
807	54	36	31.12.79	Hanifa Bano D/O Muhammad Ghulam	Dir / 3
808	54	36	20.01.80	Rukhsar Bibi D/O Said Nawab	Malakand Agency / 3
809	54	36	07.02.80	Naziat D/O Fateh Khan	Malakand Agency / 3
810	54	36	14.02.80	Faiza D/O Inayat ur Rehman	Mohmand Agency / 1
811	54	36	03.03.80	Nargis Nisa D/O Yousaf Ali	Kurram Agency / 1
812	54	36	20.03.80	Mussarat Begum D/O Amir Gul	Malakand Agency / 3
813	54	36	04.04.80	Farida Aziz D/O Aziz Ullah	Swabi / 2
814	54	36	20.10.80	Seema Nawaz D/O Muhammad Nawaz	Swabi / 2
815	54	36	19.02.81	Asia Bibi D/O Sardar Khan	Lakki Marwat / 4
816	54	36	31.05.81	Saeeda Bibi D/O Chamin Khan	Kohat / 4
817	54	36	03.01.82	Shandana D/O Meher Badshah	Malakand Agency / 3
818	54	36	03.02.82	Sajida Bashir D/O Bashir Ahmad	Lakki Marwat / 4
819	54	36	01.03.82	Samina Mahsud D/O Loi Khan	S.W Agency / 1
820	54	36	05.03.82	Sanam Gul D/O Qasim Khan	Tank / 4
821	54	36	08.08.82	Sadia Bibi D/O Haji Aurang Zeb	Abbottabad / 5
822	54	36	25.01.83	Khadija D/O Zuber Shah	Charsadda / 2
823	54	36	02.04.83	Aneela Tabasum D/O M. Saif Ullah Khan	Bannu / 4
824	54	36	03.07.83	Syeda Musarrat Shaheen D/O Mian Tabi Ullah	Dir / 3
825	54	36	06.07.83	Shagufta Shahzad D/O Shahzad Khan	Haripur / 5
826	54	36	10.07.83	Parveen Raza D/O Raza Muhammad	DI Khan / 4
827	54	36	20.11.83	Nadia Bashir D/O Bashir Ahmad	Mardan / 2
828	54	36	02.01.84	Shabana Bibi D/O Ghulam Shabbir	DI Khan / 4
829	54	36	10.03.84	Farzana Muhammad D/O Sofi Muhammad	Chitral / 3
830	54	36	15.04.84	Shahnama Shahnaz D/O Muhammad Younas Khan	Bannu / 4

831	54	36	25.03.85	Naima Hafeez D/O Hafeez ul Haq	Charsadda / 2
832	54	36	28.03.85	Hina Naheed D/O Khuda Dad	Peshawar / 2
833	54 ✓	36 ✓	24.11.85 ✓	Suraya Jabeen D/O Abdul Karim ✓	Chitral / 3 ✓
834	54	36	23.01.86	Roobi Sattar D/O Fazli Sattar	Mardan / 2
835	54 ✓	36 ✓	06.04.86 ✓	Sarhad Begum D/O Ayub Khan ✓	Dir / 3 ✓
836	54	36	25.04.86	Anjum Begum D/O Arif Hussain	Nowshera / 2
837	54	36	23.07.86	Humaira Nawab D/O Amir Nawab	Mardan / 2
838	54 ✓	36 ✓	05.01.87 ✓	Zubaira Kamal D/O Kamal ud Din ✓	Chitral / 3 ✓
839	53 ✓	39 ✓	25.10.79 ✓	Bibi Saeeda D/O Fazli Kareem ✓	Mohmand Agency / 1 ✓
840	53 ✓	38 ✓	22.07.77 ✓	Asia Ashfaq D/O Ghulam Haider ✓	Mohmand Agency / 1 ✓
841	53 ✓	37 ✓	09.06.76 ✓	Shaista D/O Shah Zamin ✓	Mohmand Agency / 1 ✓
842	53	37	31.12.81	Sobia Daud D/O Daud Khan	Haripur / 5
843	53	37	20.05.82	Maryam Gul D/O Muhammad Shah	DI Khan / 4
844	53	37	01.01.83	Salma Bibi D/O Sher Bahadar Khan	Bannu / 4
845	53	36	02.05.69	Shahnaz Qureshi D/O Nazar Hussain	Mansehra / 5
846	53 ✓	36 ✓	01.07.69 ✓	Bibi Abida D/O Khair Azam Shah ✓	Chitral / 3 ✓
847	53	36	17.06.72	Musarrat Jabeen D/O Khuda Bakhsh	Peshawar / 2
848	53 ✓	36 ✓	11.10.76 ✓	Tanweer Akhtar D/O Itbar Gul ✓	Malakand Agency / 3 ✓
849	53	36	09.05.77	Shahzana Naz D/O Muhammad Nazir Khan	UDA Mansehra / 3
850	53	36	10.02.78	Zaiba Ali D/O Syed Ali Shah	Dir / 3
851	53	36	19.04.78	Bibi Zaitoon D/O Hamid Ullah Khan	Dir / 3
852	53	36	18.03.79	Asma Bibi D/O Nisar Muhammad	Swabi / 2
853	53	36	20.04.79	Asma Bibi D/O Taj Ali Khan	Peshawar / 2
854	53	36	11.06.79	Wasiat Bibi D/O Gul Karim	Swat / 3
855	53	36	04.09.79	Shehnaz D/O Umer Wahid	Swat / 3
856	53	36	04.12.79	Begum Nasim D/O Pashmin Mian	Swat / 3
857	53	36	01.01.80	Abgina D/O Ali Muhammad	Malakand Agency / 3
858	53	36	01.01.80	Mehnaz Ali D/O Muhammad KHurshid	Swat / 3
859	53	36	01.03.80	Raina Amin D/O Syed Amin	Dir / 3
860	53	36	20.04.80	Aneela Muslim D/O Muslim Sher	Mohmand Agency / 1 ✓
861	53	36	22.12.80	Amina Chandi D/O Shah Wazir	Dir / 3
862	53	36	06.02.81	Sidra tul Muntaha D/O Syed Abdul Sattar Shah	DI Khan / 4
863	53	36	01.03.81	Rani Gul D/O Jehan Zeb	UDA Mansehra / 3
864	53	36	04.03.81	Saima Haq D/O Faiz ul Haq	Mardan / 2
865	53	36	08.10.81	Alia Bibi D/O Abdul Qadir	DI Khan / 4
866	53	36	16.01.82	Navida Bibi D/O Islam Gul	Malakand Agency / 3
867	53	36	15.04.82	Jamila Kausar D/O Habib un Nabi	Dir / 3
868	53	36	25.06.82	Fatima Nasim D/O Jamroz Khan	Swabi / 2
869	53	36	27.06.82	Shaista Ghaffar D/O Amin Ghaffar	Dir / 3
870	53	36	07.02.83	Shaheen Akhtar D/O Syed Iqbal Shah	Swabi Gadoon / 3
871	53	36	24.02.83	Khushnod D/O Khaista Muhammad	Malakand Agency / 3
872	53	36	15.03.83	Tamkeen Zahra D/O Altaf Hussain Shah	DI Khan / 4
873	53	36	11.05.83	Zeenat Bibi D/O Gul Nawab	Karak / 4
874	53	36	23.01.84	Sajida Shamim D/O Muhammad Shamim	Swat / 3
875	53	36	01.02.84	Salma Zakria D/O Muhammad Zakria	Haripur / 5

876.	53	36	05.02.84	Mehdia Bibi D/O Hayat Nabi	Malakand Agency / 3	
877.	53	36	03.04.84	Asia D/O Rahmat Zada	Dir / 3	AA
878.	53	36	11.04.84	Sajida Bibi D/O Wahid Bakhsh	DI Khan / 4	
879.	53	36	04.10.84	Shazia Noureen D/O Noor Kamal	Lakki Marwat / 4	
880.	53	36	01.04.85	Husna Amin D/O Amin ul Haq	Dir / 3	
881.	53	36	03.12.85	Sumaira D/O Fazal Kareem	Mardan / 2	
882.	53	36	10.03.86	Shabana Afroze D/O Noor Shah Gul	Karak / 4	
883.	53 ✓	36 ✓	04.06.86	Ayesha Bibi D/O Rab Nawaz Khan ✓	Khyber Agency / 1 ✓	
884.	52	38	15.01.75	Farzana Nazir D/O Nazir Shah	Kohat / 4	
885.	52 ✓	37 ✓	20.08.77	Shabana Khan D/O Mir Baz Khan ✓	S.W Agency / 1 ✓	
886.	52 ✓	37 ✓	12.04.83	Afsana Bibi D/O Gul Nawaz Khan ✓	S.W Agency / 1 ✓	
887.	52	36	04.02.72	Shazia Shaoor D/O Saif ur Rehman	Karak / 4	
888.	52	36	20.02.75	Shakeela Naz D/O Muhammad Amir Khan	Dir / 3	
889.	52	36	01.05.75	Mirza Begum D/O Zeer Bali Khan	Chitral / 3	
890.	52	36	07.03.76	Zulikha D/O Haji Khan	Chitral / 3	
891.	52	36	31.12.77	Maryam Bibi D/O Khaista Noor	Dir / 3	
892.	52	36	15.01.79	Tauheed Bibi D/O Abdur Rahman	Swat / 3	
893.	52	36	30.12.79	Surriya D/O Muhammad Inayat Ullah	Dir / 3	
894.	52	36	15.01.80	Samina Begum D/O Mustajir Shah	Haripur / 5	
895.	52	36	29.02.80	Nusrat Shaheen D/O Fazal Akbar Khan	Swat / 3	
896.	52 ✓	36 ✓	10.04.81	Kalsoom Muslim D/O Muslim Sher ✓	Mohmand Agency / 1 ✓	
897.	52	36	14.12.81	Aftab D/O Abdul Ahad	Malakand Agency / 3	
898.	52	36	02.01.82	Bibi Sakina D/O Mir Azam Khan	Chitral / 3	
899.	52	36	15.02.82	Kishwar Jabeen D/O Qazi Qutbuddin	Chitral / 3	
900.	52	36	02.03.82	Rashida Begum D/O Samar Khan	UDA Mansehra / 3	
901.	52	36	01.01.83	Shahzad Begum D/O Adam Khan	Malakand Agency / 3	
902.	52	36	01.11.83	Zeenat un Nisa D/O Mushtaq Ahmad	Bannu / 4	
903.	52	36	02.05.85	Salma Shareef D/O Haji Muhammad Sharif	Abbottabad / 5	
904.	52	36	03.11.85	Irum Awan D/O Fateh Muhammad	UDA Mansehra / 3	
905.	51 ✓	37 ✓	05.04.79	Nazia Rahman D/O Amir Rahman ✓	Mohmand Agency / 1 ✓	
906.	51	36	20.01.63	Nasim Begum D/O Abdul Qadir	Hangu / 4	
907.	51	36	02.03.74	Sajida Bibi D/O Muhammad Karim	Chitral / 3	
908.	51 ✓	36 ✓	01.11.76	Zahida Begum D/O Noor Rehman ✓	Mohmand Agency / 1 ✓	
909.	51 ✓	36 ✓	18.02.77	Hussan Jamala D/O Sher Zada ✓	Mohmand Agency / 1 ✓	
910.	51	36	29.09.78	Naseera Khurshid D/O Khurshid Alam	Mansehra / 5	
911.	51	36	02.03.79	Irum Naz D/O Qasim Jan	Dir / 3	
912.	51	36	12.06.80	Jumlain Bibi D/O Sami Ullah Khan	Kohat / 4	
913.	51	36	20.09.81	Shagufta Gul D/O Noor ul Haq	Dir / 3	
914.	51	36	02.04.82	Shabnam Kawsar D/O Sherin Zada Mian	Swat / 3	
915.	51	36	14.01.83	Seemab D/O Sultan Mahmood	Malakand Agency / 3	
916.	50 ✓	37 ✓	27.08.82	Yasmeen Begum D/O Abdul Hameed ✓	Bajaur Agency / 1 ✓	
917.	50	36	28.11.76	Farzana D/O Abdul Ghaffar	Chitral / 3	
918.	49 ✓	36 ✓	16.04.79	Safia Begum Afridi D/O Tahir Shah Afridi ✓	Khyber Agency / 1 ✓	

Telephone No. 091-9222516



KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
2-FORT ROAD, PESHAWAR CANTT
(NEAR GOVERNOR HOUSE)

AUTHORITY LETTER

Mr. Mehtab Gul Law Officer-II (BS-17), Khyber Pakhtunkhwa Public Service Commission is hereby nominated / authorized to get the comments vetted and submit on behalf of, Khyber Pakhtunkhwa Public Service Commission.

A handwritten signature in black ink, appearing to be 'A. W.', is written over the printed name of the Secretary.

Secretary
Khyber Pakhtunkhwa
Public Service Commission

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 5369/2020

Mst: Tahira Naz Ex-SST (General) District Mardan.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others...Respondents

JOINT PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No: 1-2.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief she has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 9 That the instant Service Appeal is not maintainable in its present form.
- 10 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.

- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification No. 4061-90/A-17/SST/Complaint/Tahira Naz dated 09/12/2019 of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents. **(Copy of the said Notification dated 09-12-2019 is Annex-A).**
- 14 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 09/12/2019.
- 15 That the recommendation letter of the appellant has been declared as fake and bogus by the KPK PSC.
- 16 That the Notification dated 25-06-2012 has correctly been disowned by the Respondent Department on the grounds of being fake & bogus after observing all Codal formalities.

ON FACTS.

- 1 That Para-I needs no comments.
- 2 That Para-2 pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct to the extent of inviting application for the appointments against the SSTs B-16 post vide advertisement No.01/2009 dated 26-01-2009 through the KPK PSC dully disowned by the Respondent Department dismissed the impugned Notification dated 09-12-2019 on the grounds of being fake & bogus having no record. **(Copy of the advertisement dated 26-01-2009 is Ann-B).**
- 4 That Para-4 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of her stand regarding her filling of application for the appointment against the SST (G) B-16 post to the KPK PSC/Respondent No.3, nor she has been appeared in written test & interview neither the appellant has been recommended by the KPK PSC against the SST BPS-16 post vide recommendation letter dated 25-06-2012 issued by the KPK PSC.

Therefore, the claim regarding appearing before the Medical Board & declaring her medically fit makes no legal ground & even based on mala fide intensions on the part of the appellant. (Copy of the fake & bogus appointment order dated 25-06-2012 is Annexure-C).
- 5 That Para-5 is incorrect & denied on the grounds that the appellant has not been recommended by the KPK PSC & adjusted in the Respondent Department against the SST (G) B-16 post in District Mohmand vide Notification dated 31-07-2012, hence the plea of the appellant is illegal & liable to be dismissed.

- 6 That Para-6 is correct that the salary of the appellant has been stopped since February 2019 on the grounds of her fake & bogus appointment order dated 25-06-2012, whereas, rest of the Para regarding filling of a W.P No.3624-P/19 under case tiled Tahira Naz Vs Govt; before the Honorable Peshawar High Court Peshawar is relates to the record of the Court with the submission that the case of the appellant is agasint the provision of section-11 CPC 1908 (Res-judicata) & is laible to be dismissed in favor of the Respondents as evident from the order sheet dated 17-09-2019 & 16-01-2020 (**Copies of the order sheets dated 17-09-2019 & 16-01-2020 are Annexures-D & E**).
7. That Para-7 correct that in view of the fake & bogus appointment order dated 25-06-20012 of the appellant has been served a show cause Notice dated 02-10-2019 dully replied by the appellant in an un satisfactory manner which resulted in the impugned Notification dated 09-12-2019, whereby the fake & bogus, 1st appointment order dated 25-06-2012 has been disowned of being ab initio under the relevant rules against the appellant after due process of Law & procedure. (**Copies of the show cause Notice Dated 02-10-2019 & impugned Notification dated 09-12-2019 are Annexures-F & G**).
8. That Para-8 is incorrect & denied as the act of the Respondent Department with regard to the impugned Notification dated 09-12-2019 against the appellant is legal, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia:-

ON GROUNDS.

- A **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the impugned Notification dated 09-12-2019 by the Respondent Department in the instance case, hence, the stand of the appellant is baseless & liable to be rejected.
- B **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 09-12-2019 by the Respondent Department in the instance case having no question of violating the provision of Article 10-A of the constitution of Islamic republic of Pakistan 1973, hence, the stand of the appellant is baseless & liable to be rejected .
- C **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents.
- D **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification on the grounds that the 1st appointment order dated 25-06-2012 has been found fake & bogus by the Respondents, hence, the services of the appellant against the SST (G) B-16 post has been disowned by the competent authority vide Notification date 09-12-2019 under the relevant provisions of law & rules

- 4
- E **Incorrect & not admitted.** The plea of the appellant is without justification & liable to be rejected as the mentioned reported judgments of the apex courts of law do not apply upon the case of the appellant in the given circumstances of the case.
- F. **Incorrect & not admitted.** The plea of the appellant is without justification & liable to be rejected as the mentioned reported judgments of the apex courts of law do not apply upon the case of the appellant in the given circumstances of the case as the appointment order of the appellant has been found fake & bogus by the Respondent Department.
- F **Legal.** However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated ___/___/2021.


SECRETARY

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2)

AFFIDAVIT

I, **Dr. Hayat Khan Asstt: Director (Litigation-II)** E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief.


Deponent

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 5369/2020

Mst: Tahira Naz Ex-SST (General) District Mardan.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others...Respondents

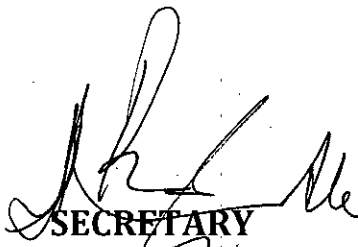
**REPLY TO THE CONDONATION OF DELAY APPLICATION FOR & ON BEHALF OF
RESPONDENTS NO: 1 & 2.**

Respectfully Sheweth :-

The Respondents submit as under:-

- 1 That Para-1 is incorrect as the case of the appellant is badly time barred under the law of limitation Act 1908, hence, the Notification dated 09-12-2019 is not only legally competent but has also got finality against the appellant.
- 2 That Para-2 is also incorrect & denied as the case of the appellant is badly time barred under the law of limitation Act 1908, hence, the Notification dated 09-12-2019 is not only legally competent but has also got finality against the appellant having no question violating the provision Article 10-A of the constitution of 1973.
- 3 That Para-3 is incorrect & denied. The statement of the appellant baseless & liable to be rejected as the Respondents have got a very good prima facie case and the chances of its success are very bright in favor of the Respondents if the order dated 09-12-2019 is not maintained, then, the Respondent Department shall suffer huge losses as valuable legal rights are attached with the instant case of the Respondents.
- 4 That Para-4 is incorrect & denied. The Respondents have got a very good prima facie case and the chances of its success are very bright in favor of the Respondents.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Application with cost in favor of the Respondent Department.


SECRETARY


E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2)

AFFIDAVIT

I, **Dr. Hayat Khan Asstt: Director (Litigation-II)** E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief.


Deponent

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 5369/2020

Mst: Tahira Naz Ex-SST (General) District Mardan.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others...Respondents

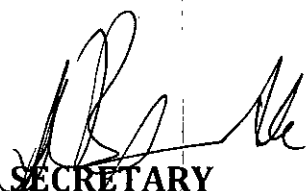
REPLY TO THE STAY APPLICATION FOR & ON BEHALF OF RESPONDENTS No: 1 & 2.

Respectfully Sheweth :-

The Respondents submit as under:-

- 1 That Para-1 needs no comments being pertains to the record.
- 2 That Para-2 needs no comments. However, the facts & grounds as taken in the main reply may also be treated an integral part of this reply to the instant application on behalf of the Respondents.
- 3 That Para-3 is incorrect & denied. The Respondents have got a very good prima facie case and the chances of its success are very bright in favor of the Respondents.
- 4 That Para-4 is incorrect & denied. The Respondents have got a very good prima facie case and the chances of its success are very bright in favor of the Respondents.
- 5 That Para-5 is also incorrect & denied. If the operation of the impugned Notification dated 09-12-2019 is not maintained then the Respondent will suffer irreparable loss of the Administrative nature. .

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Application with cost in favour of the Respondent Department.


SECRETARY

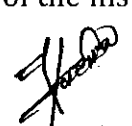
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2)

AFFIDAVIT

I, **Dr. Hayat Khan Asstt: Director (Litigation-II)** E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief.


Deponent



NOTIFICATION

1. WHEREAS, Mst. Tahira Naz d/o Afzal Khan, resident of Mughal Banda Tehsil Takhtbhai District Mardan was reported by the DEO (F) Swabi as bogus SST (G) and fraudulently working at GGHS Parmoli Swabi vide her report No.1282 dated 28.02.2019.
2. AND WHEREAS, a fact-finding inquiry was ordered against the bogus teacher vide Endst: No.8126-28 dated 27.3.2019.
3. AND WHEREAS, the inquiry officer Mr. Siraj Muhammad DEO (M) Malakand proved the appointment of Mst. Tahira Naz as SST (G) as bogus vide his report dated 22.7.2019.
4. AND WHEREAS, to fulfill the course of natural justice a show cause notice was served upon the referred bogus teacher vide No.5285/a-17/Compliant/Tahira Naz/Swabi dated 02.10.2019.
5. AND WHEREAS, she submitted her reply to the show cause on 21-10-2019 which was found unsatisfactory.
6. AND WHEREAS, she was granted the opportunity of personal hearing vide No.4611/A-17/Compliant/Tahira Naz/Swabi dated 1-11-19, which she did not avail.
7. AND WHEREAS, the competent authority, after having considered the evidence on record, findings of inquiry report, reply to show cause of the bogus teacher and non-availing the opportunity of personal hearing by the bogus teacher, has come to the conclusion that the charges given in the show cause have been proved against Mst. Tahira Naz d/o Afzal Khan and that the notification regarding placement of her services at the disposal of Director of education Fata for further posting issued vide 2816-23/FNo.2/A-14/SST(F)Gen/PSC/APPTT Dated 25-06-2012 is found bogus.
8. NOW THEREFORE, under the mandatory provisions and powers conferred under the section 16 and 21 of General Clauses Act 1897 as amended in 1956 the Director Elementary & Secondary Education Khyber Pakhtunkhwa as the competent authority is pleased to disown ab initio Mst. Tahira Naz d/o Afzal Khan and declare her as bogus SST (G) GGHS Parmoli District Swabi liable to be proceeded as per PPC 419 & 420 by the law enforcing agencies in the interest of public service.

ATTESTED

Endst: No. 4061-70 /A-17/SST/Complaint/Tahira Naz/Swabi

Copy forwarded for information and necessary action to the: -

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Dated Peshawar the 07-12 2019.

Annc

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NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** Merit.

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:**

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) Five (05) Posts of Data Entry Operators.

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes. **ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

ATTACHED

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04) One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Male. **ALLOCATION:** NOTE: In case of non-availability of candidates possessing the

provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
5.	Islamiyat	02	Merit Quota
6.	Pak: Study	03	Merit Quota
7.	History-Cum-Civics	02	Merit Quota
8.	Economics	02	Merit Quota
9.	English	02	Merit Quota
10.	Statistics	02	Merit Quota
11.	Maths	02	Merit Quota
12.	Biology	02	Merit Quota
13.	Chemistry	02	Merit Quota
14.	Physics	02	Merit Quota

(S.No. 52) **Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) **Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 54) **Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram , Mansehra , Shangla , Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 55) **Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(S.No. 56) **Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

(S.No. 57) **Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) **Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.**

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 59) **Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institure.**

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such. OR (c)

Bachelor's Degree in Engineering/ Associate Member Institute of Engineering in the relevant subject from a recognized University / Institution with Seven years teaching/ professional experience in the relevant subject as such.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.
ALLOCATION: Merit.

(S.No. 60) **Twenty Two (22) Posts of Male Instructor/Lecturer in Commerce for Govt: College of Commerce/Govt: Commercial training Institute.**

QUALIFICATION: 2nd Class Master Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
05	04	04	04	03	02

(S.No. 61) **Three (03) Posts of Male Instructor/Lecturer in Commerce for Earthquake Affected Areas for Govt: College of Commerce/Govt: Commercial training Institute.**

QUALIFICATION: 2nd Class Master Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: Merit. (District Wise Distribution)

Battagram	Shangla	Kohistan
01	01	01

(S.No. 62) **Fourteen (14) Posts of Male Instructor/ Lecturer of computer Science for Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

QUALIFICATION: (i) 2nd Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
04	02	02	02	02	02

(S.No. 63) **One (01) Post of Male Instructor/ Lecturer of computer Science (Disable) for Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

QUALIFICATION: (i) 2nd Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 64) **One (01) Post of Female Instructor Commerce. In GCC/GCTIs.**

QUALIFICATION: 2nd Class Master's Degree in the relevant Subjects or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Female.

ALLOCATION: Zone-5

ATTESTED

(S.No. 65) **One (01) Post of Male Instructor/ Lecturer of computer Science Earth quack Affected Area in Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

QUALIFICATION: (i) 2nd Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

10

(S.No. 66) Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-14. **ELIGIBILITY:** Male.

ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
02	02	02	02	02

(S.No. 67) One (01) Post of Female office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-14. **ELIGIBILITY:** Female.

ALLOCATION: Merit.

CORRIGENDUM

1. The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
2. The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009. Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and upper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla. Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED

- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
- Written Test in the Subject.
 - General Knowledge or Psychological General Ability Test.
 - Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra.
- Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

ATTESTED

(Atta Ur Rehman)
Secretary

NWFP Public Service Commission
2-Fort Road Peshawar Cantt: Ph: 9212962

Appointment Order No. 11 SST (G) FATA Advi No 1/2009

Annex = ①

①②



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@yahoo.com

And — ③

Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST General) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his Services placed at the disposal of Director Education FATA for further posting against vacant SST Genral posts:-

S. #	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1.	Naheed Akhtar	Musafar Khan	Khyber Agency	1	Hayatabad Phase-IV Tehsil & District: Peshawar	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
2.	Nazakat Bibi	Syed Ali Shah	Mohmand Agency	1	Vill: Mattai Dara P/O Yousaf Khel Mohmand Agency	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
3.	Tahira Naz	Afzal Khan	Mohmand Agency	1	Mughal Banda P/O, Saro Shah Tehsil Takht Bhai District Mardan	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
4.	Sabiha	Mian Gul Jan	Mohmand Agency	1	Khur Abad, Sahib Gul Mahal P/O Dakki Teshil tangi District Charsadda	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.

Terms and conditions:-

1. Her services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. She will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, she is already in Government service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of

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ATTESTED

- pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of contributory provident fund allowed to her under new appointment.
3. Her services are liable to termination on one months notice from either side. In case of resignation with out notice her one-month pay/allowances shall be forfeited to the Government.
 4. She should join her post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification her appointment will expire automatically and no subsequent appeal etc shall be entertained.
 5. She would be on probation for a period of one year extendable for another one year.
 6. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
 7. Her Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
 8. Charge report should be submitted to all concerned
 9. The DEO (F) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
 10. The DEO(F) concerned will verify their documents before release of pay.
 11. Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
 12. No TA/DA will be allowed to the appointee for joining his duty.

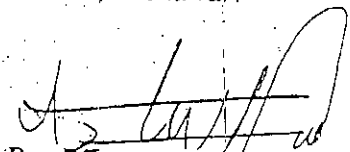
(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

2816-23

Endst: No. /File No. 2/A-14/SST(F) Gen/PSC/Apptt: Dated Peshawar the 25-6-2012

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
 3. Director of Education FATA Warsak road Peshawar.
 4. All Agency Accounts Officers in FATA.
 5. Official Concerned
 6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
 7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 8. M/File

ATTESTED


Dy: Directoeress (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

"Ann



Ord - P




(14)

PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge.
1	2
17.09.2019	<p><u>Writ Petition No.3624-P/2019</u></p> <p>Present: Mr. Khalid Khan, Advocate, for the petitioner.</p> <p>*****</p> <p>Call for the comments of respondents No.3 & 4 so as to reach this Court within a fortnight. Adjourned to a date in office.</p> <p style="text-align: right;">  SENIOR PUISNE JUDGE  JUDGE </p>

ATTESTED 

(Fayaz)

(D.B) Justice Qaiser Rashid Khan & Justice Muhammad Naeem Anwar

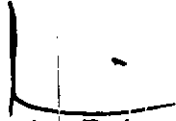

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25

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

Date of order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary
2.	3.
16.01.2020	<p><u>WP No.3624-P/2019 with I.R.</u></p> <p><u>Present:</u> Clerk of counsel for the petitioner.</p> <p>*****</p> <p>A final opportunity is afforded to respondents No.3 & 4, to file the requisite comments to the writ petition without fail within a fortnight.</p> <p style="text-align: center;">  Senior Puisne Judge </p> <p style="text-align: center;">  Judge </p>

ATTESTED



**DIRECTORATE OF ELEMENARY & SECONDARE EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

1. WHEREAS, Mst. TahiraNaz d/o Afzal Khan, resident of Mughal Banda Tehsil Takhtbhai District Mardan was reported by the DEO (F) Swabi as bogus SST (G) and fraudulently working at GGHS Parmoli Swabi vide her report No.1282 dated 28.02.2019.
2. AND WHEREAS, a fact-finding inquiry was ordered against the bogus teacher vide Endst: No.8126-28 dated 27.3.2019.
3. AND WHEREAS, the inquiry officer Mr. Siraj Muhammad DEO (M) Malakand proved the appointment of Mst. TahiraNaz as SST (G) as bogus vide his report dated 22.7.2019.
4. AND WHEREAS, to fulfill the course of natural justice a show cause notice was served upon the referred bogus teacher vide No.5285/a-17/Compliant/TahiraNaz/Swabi dated 02.10.2019.
5. AND WHEREAS, she submitted her reply to the show cause on 21-10-2019 which was found unsatisfactory.
6. AND WHEREAS, she was granted the opportunity of personal hearing vide No.4611/A-17/Compliant /TahiraNaz/Swabi dated 1-11-19, which she did not avail.
7. AND WHEREAS, the competent authority, after having considered the evidence on record, findings of inquiry report, reply to show cause of the bogus teacher and non-availing the opportunity of personal hearing by the bogus teacher, has come to the conclusion that the charges given in the show cause have been proved against Mst. TahiraNaz d/o Afzal Khan and that the notification regarding placement of her services at the disposal of Director of education Fata for further posting issued vide.2816-23/FNo.2/A-14/SST(F)Gen/PSC/APPTT Dated 25-06-2012 is found bogus.
8. NOW THEREFORE, under the mandatory provisions and powers conferred under the section 16 and 21 of General Clauses Act 1897 as amended in 1956 the Director Elementary & Secondary Education Khyber Pakhtunkhwa as the competent authority is pleased to disown ab initio Mst. TahiraNaz d/o Afzal Khan and declare her as bogus SST (G) GGHS Parmoli District Swabi liable to be proceeded as per PPC 419 & 420 by the law enforcing agencies in the interest of public service.

ATTACHED

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4061-70 /A-17/SST/Complaint/TahiraNaz/Swabi

Dated Peshawar the 09-12 2019.

Copy forwarded for information and necessary action to the:



Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar

No. _____ /A-17/Complaint/Tahira Naz/Swabi

Dated Peshawar the / /2019

SHOW CAUSE NOTICE

I, Hafiz Muhammad Ibrahim, Director Elementary & Secondary Education Khyber Pakhtunkhwa as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 do hereby serve upon you Mrst. Tahira Naz D/o Afzal Khan resident of Mughal Banda Tehsil Takht Bhai, Distt. Mardan this show cause notice as follows:

- That consequent upon the report of DEO (F) District Swabi vide No.1282 dated 28.02.2019 you have been found to have appointed yourself fraudulently and bogusly as SST (G) and have so far been able to station yourself at GGHS Parmoll District Swabi which is a gross violation of law of the land.
- That consequent upon the above report of the DEO (F) Swabi, a formal inquiry was launched against you by the Inquiry Officer Mr. Siraj Muhammad DEO (M) Malakand vide this Directorate Notification No.3089 dated 18.06.2019.
- That the Inquiry Officer in his report dated 18.07.2019 has proved your appointment as SST (G) as bogus and fake.
- That by virtue of this bogus and fake appointment you have fraudulently drawn salaries and have inflicted heavy losses onto the Public/Government Treasury since 25.06.2012.

- After going through the findings and recommendations of the Inquiry Officer, the materials on record and other connected papers including your non-attendance before the inquiry officer, I am satisfied that you have committed crime and have grossly violated the law of land and, therefore, you have rendered yourself liable to be proceeded under PPC 419 & 420.
- As a result, thereof, I as the Competent Authority have tentatively decided to hand you over to the law enforcement agency for the crime you committed as mentioned above and recovery of the losses you inflicted on Government Treasury.
- You are, therefore, required to show cause as to why the aforementioned action should not be taken against you and also intimate whether you desire to be heard in person.
- If no reply to this effect is received within 15 days of its issuance, it shall be presumed that you have no defense to put in and in that case Ex-Parte action shall be taken against you.

(Dr. Hafiz Muhammad Ibrahim)
Competent Authority

Director E&SE Khyber Pakhtunkhwa, Peshawar

End of Even No. & Date. 2/10/19

Copy of the above is forwarded for information to the:-

- PS to Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- District Education Officer (F) Swabi.
- Principal/Headmistress GGHS Parmoll District Swabi.
- Mrst. Tahira Naz D/o Afzal Khan resident of Mughal Banda, Tehsil Takht Bhai, District Mardan.
- DD Litigation Local Office.
- Abdur Rashid PSHT GPS Central Agra District Malakand.
- Office Copy.

ATTESTED

(Dr. Hafiz Muhammad Ibrahim)
Competent Authority

Director E&SE Khyber Pakhtunkhwa, Peshawar

Mrs. Tahira Naz D/o Afzal Khan resident of Mughal Banda, Tehsil Takht Bhai, District Mardan.