

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.**

**BEFORE:** KALIM ARSHAD KHAN --- CHAIRMAN  
MIAN MUHAMMAD --- MEMBER(E)

*Service Appeal No.136/2022*

**Mahmood Iqbal**, Deputy DEO (Male), Education Department,  
D.I.Khan.

.....(**Appellant**)

Versus

1. **Government of Khyber Pakhtunkhwa**, through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. **Secretary Elementary & Secondary Education Department**, Khyber Pakhtunkhwa, Peshawar.
3. **Director**, Elementary & Secondary Education Department, Peshawar.
4. **Director**, EMIS, E&SE, Khyber Pakhtunkhwa.
5. **District Education Officer (M)**, Dera Ismail Khan.
6. **District Education Officer (M)**, Orakzai.
7. **District Accounts Officer**, D.I.Khan.
8. **Mr. Asim Saeed**, Principal GHS, Himmat, D.I.Khan.

.....(**Respondents**)

Present:


Mr. Ahmad Ali Khan,  
Advocate.....For appellant.

Mr. Hidayat Ullah Malana,  
Advocate.....For respondent No.8

Mr. Muhammad Adeel Butt,  
Additional Advocate General and


Mr. Farhaj Sikandar,  
District Attorney.....For official respondents.

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Date of Institution.....24.01.2022  
Date of Hearing.....01.07.2022  
Date of Decision.....05.07.2022



**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AIMED AGAINST THE IMPUGNED NOTIFICATION BEARING NO. SO(SF)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 03.01.2022 WHEREBY THE APPELLANT WAS TRANSFERRED TO DISTRICT ORAKZAI AND SUBSEQUENT NOTIFICATION BEARING NO. SO (MC)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 10.01.2022 WHEREBY THE RESPONDENT NO.8, DESPITE HAVING TEACHING CADRE WAS TRANSFERRED AND POSTED AS DEPUTY DEO (MALE), D.I.KHAN IN VIOLATION OF LAW, RULES AND POLICY IN VOGUE BY THE PROVINCIAL GOVERNMENT, AS NO OFFICIAL/TEACHER MAY HOLD THE POST RELATING TO ADMINISTRATION.**

**JUDGMENT**

  
**KALIM ARSHAD KHAN CHAIRMAN:** Appellant has filed this appeal against order dated 03.01.2022 vide which he was transferred to District Orakzai. He also impugned notification dated 10.01.2022 whereby private respondent No.8 was alleged to be belonging teaching cadre and was posted as Dy: DEO (M) in violation of rules, law and policy by the provincial government.

2. Facts surrounding the appeal are that appellant was serving as Dy: DEO (M) in the Education Department, Khyber Pakhtunkhwa and vide notification dated 03.01.2022, he was posted as DDEO (M) Orakzai; that the appellant had been declared as Returning Officer D.I.Khan during the Local Government Election 2021. In view of notification by the Election Commission of Pakistan dated 25.10.2021, ban was imposed upon transfer/posting of the Government Officers and Officials. That the said directions had not been taken into consideration and the impugned notification was issued on 03.01.2022; that the appellant preferred departmental appeal

to the respondents on 06.01.2022; that during the pendency of departmental appeal, on the vacant post of DDEO (Male)D.I.Khan, another transfer/posting order dated 10.01.2022 was issued whereby respondent No.8 was posted as Dy: DEO(M), D.I.Khan, who belonged to the teaching cadre whereas the post of Dy: DEO(M), D.I.Khan was purely administrative one; that the appellant had not been allowed to complete his normal tenure; that the departmental appeal of the appellant had not been responded within the statutory period of ninety days, hence, the instant service appeal.

3. On receipt of the appeal and its admission to full hearing, the respondents were summoned, who on putting appearance contested the appeal by filing written reply raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellant.

4. We have heard learned counsel for the appellant, learned Additional Advocate General for the official respondents and learned counsel for private respondent No.8.

5. The learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned AAG controverted the same by supporting the impugned order(s).

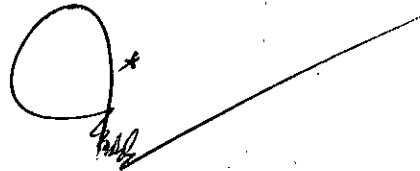
6. At the very <sup>onset</sup> when learned counsel for the appellant was confronted that the notification of transfer dated 10.01.2022 did not contain the name of the appellant then how could he be aggrieved of the same to which he submitted that was just for information of the

Tribunal that the Education department was working with malafide. It is brought in the notice of the Tribunal that after issuance of impugned transfer order dated 03.01.2022, the respondents through a notification dated 26.01.2022 partially modified the notification of 2021 retaining one Zahidullah against the post of Dy: DEO (M) Orakzai but the appellant was not given any other post. The representative of the respondents was asked as to where would the appellant go to perform duty, to which they assured that they would give appropriate posting to the appellant within few days. In view of the assurance of the representative of the respondents, it is directed that the appellant be posted within (10) days at place deemed appropriate by the Authority. The appeal is disposed of accordingly. Cost shall follow the event. Consign.

7. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 05<sup>th</sup> day of July, 2022.*



**KALIM ARSHAD KHAN**  
Chairman



**MIAN MUHAMMAD**  
Member Executive

**ORDER**

5<sup>th</sup> July, 2022

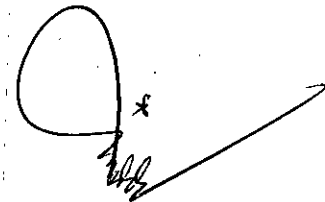
Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Faheem Ullah, Assistant for official respondents present.

2. Vide our detailed judgement of today placed on file (containing 04 pages), In view of the assurance of the representative of the respondents, it is directed that the appellant be posted within (10) days at place deemed appropriate by the Authority. The appeal is disposed of accordingly. Costs shall follow the event. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 05<sup>th</sup> day of July, 2022.*



(KALIM ARSHAD KHAN)  
CHAIRMAN.

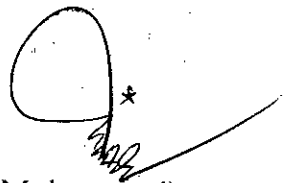


(MIAN MUHAMMAD)  
MEMBER(E)

27.06.2022

Mr. Ahmad Ali Khan, Advocate for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Faheem Ullah, Assistant and Dr. Khalid Saeed Akbar, Litigation Officer for official respondents present. Mr. Hidayat Ullah Malana, Advocate for private respondent 8 present.

Learned counsel for the appellant requested for short adjournment on the ground to submit rejoinder in response to the reply of the respondents. Request is acceded to. To come up for rejoinder and arguments before the D.B on 01.07.2022. The operation of both the impugned notifications dated 31.01.2022, and 10.01.2022 shall remain suspended to the extent of appellant and private respondent No. 8 till next date.

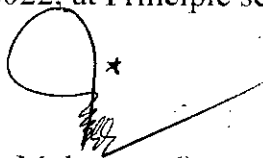


(Mian Muhammad)  
Member (E)  
Camp Court, D.I.Khan

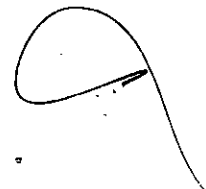
01.07.2022

Mr. Ahmad Ali Khan, Advocate for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Faheem Ullah, Assistant and Dr. Khalid Saeed Akbar, Litigation Officer for official respondents present. Mr. Hidayat Ullah Malana, Advocate for private respondent No. 8 present.

Arguments heard. To come up for order before the D.B on 05.07.2022, at Principle seat Peshawar.



(Mian Muhammad)  
Member (E)  
Camp Court, D.I.Khan

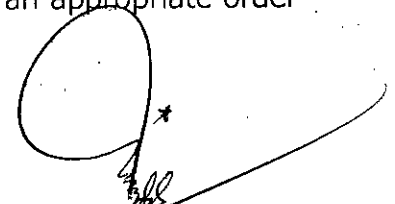


(Kalim Arshad Khan)  
Chairman  
Camp Court, D.I.Khan

26.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Dr. Khalid Saeed Akbar Litigation Officer for official respondents No. 1 to 5 present. Mr. Hidayat Ullah Malana, Advocate for private respondents present.

Written reply/comments of respondent No. 6 i.e. District Education Officer (Male) Orakzai submitted which is placed on file and copy thereof provided to learned counsel for the appellant. Learned counsel for the appellant submitted an application for transfer of the instant service <sup>appeal</sup> to Camp Court D.I Khan on the ground that all necessary parties are belonging to that area of jurisdiction. It is also evident from the order sheet dated 31.01.2022 that interim relief has been granted and the impugned orders have been suspended to the extent of appellant and private respondent No. 8. Being an administrative issue, it is submitted for perusal of the Honourable Chairman to decide and pass an appropriate order on the application.



(Mian Muhammad)  
Member (E)

Chairman Service Tribunal

26.5.22

Be sent to D Uha  
Court & fixed  
Camp in the work zone  
27-6-22

20.04.2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Muhammad Faizan Zeb, SO (Litigation) for official respondents and Mr. Naz Ur Rehman, Advocate on behalf of private respondent No.8 present.

Written reply/comments on behalf of respondents No. 2 to 5 and 8 submitted which is placed on file. Notices be issued to respondents No. 6 and 7 for submission of written reply/comments. Notices be also issued to the appellant and his counsel. Adjourned. To come up for written reply/comments of respondents No. 6 and 7 on 26.05.2022 before S.B. The operation of both the impugned notifications dated 03.01.2022, and 10.01.2022 are suspended to the extent of appellant and private respondent No.8 till next date.

  
(MIAN MUHAMMAD)  
MEMBER(E)



31.01.2022

Counsel for the appellant is present. Preliminary arguments have been heard.

The appellant has impugned the Notification dated 03.1.2022 and 10.01.2022. By the Notification dated 03.01.2022, the appellant was transferred from the post of Deputy DEO (Male) DIKhan and was posted against similar post at District Orakzai vide Notification dated 10.01.2022. The respondent No. 8 belonging to Teaching Cadre was transferred from the post of Principal GHS Himmat D.I.Khan and was posted at Deputy DEO (Male) D.I.Khan against vacant post which became vacant due to transfer of appellant vide Notification dated 03.01.2022. Counsel for the appellant pointed out an Notification dated 26.01.2022, whereby one Zahid Ullah who was transferred from the post of DEO(male)Orakai vide Notification dated 03.01.2022 has been retained as such in District Orakzai. He further contends that the appellant is in vacuum. Points raised need consideration. The appeal is admitted for regular hearing. 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 24.02.2022 at Camp Court D.I.Khan.

Alongwith the appeal, the appellant has also submitted an application for suspension of the operation of impugned Notifications dated 03.01.2022 and 10.01.2022. Notice of application be given to the respondents for the date fixed. The operation of both the impugned Notification dated 03.01.2022 and 10.01.2022 are suspended to the extent of appellant and private respondent No.8 till date fixed.

Appellant Deposited  
Security & Process Fee

31/01/22

Chairman

Before Honorable Chairman NPH Seema Tribunal.

Mahmud Iqbal

versus

Govt of NPH & others,

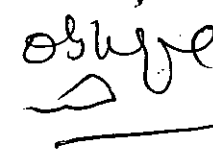
Application for early hearing

Pl sheweth

- 1- That the above listed appeal is filed & needs early hearing.
- 2- That above case is related to D/When Camp court but there is no chance of loss at D/When.

Therefore kindly hear the above listed appeal & this send it to D/When.

Dated 31/1/2022

W <sup>oblique</sup>   
Khalid Mahmud  
Served  
Stated at D/When

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST**

Case Title: Muhammad Iqbal vs Govt of KP & others

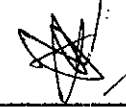
S.#	Contents	Yes	No
1.	This appeal has been presented by: _____	✓	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on	✓	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on	✓	
26.	Whether copies of comments/reply/rejoinder submitted? on	✓	
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: \_\_\_\_\_

Ahmad Ali

Signature: \_\_\_\_\_



Dated: \_\_\_\_\_

29/01/20



**PAKISTAN**

ISLAMIC REPUBLIC OF PAKISTAN

National Identity Card



Name  
Mahmood Iqbal

محمود اقبال



Father Name  
Khairati Khan

خیرتی خان

Gender	Country of Stay
M	Pakistan

Identity Number	Date of Birth
12103-2247176-3	01.12.1967

Date of Issue	Date of Expiry
20.06.2018	20.06.2028



Holder's Signature

موجودہ محلہ سادہ انگرہ پھاڑ پور تحصیل پھاڑ پور ضلع

ڈیڑہ اسماعیل خان

12103-224717G-3



مستقل محلہ سادہ انگرہ پھاڑ پور تحصیل پھاڑ پور ضلع

ڈیڑہ اسماعیل خان

101351119110  
149-87-024173

Osman Y. Motin

Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں

**BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 136 of 2022

Mahmood Iqbal ..... Appellant

Versus

Government of K.P.K through  
Chief Secretary, Peshawar  
and others / ..... Respondents

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Dt. \_\_\_/\_\_\_/2022

*Mahmood Iqbal*  
Yours humble Appellant  
Through Counsel

*Ahmad Ali*

Advocate Supreme Court

(P)

**BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 136 of 2022

Mahmood Iqbal, Deputy DEO (Male), Education Department,  
D.I.Khan.

Khyber Pakhtunkhwa  
Service Tribunal

**Appellant**

Diary No. 121

**Versus**

Dated 31-01-2022

- 9 / 3
1. **Government of Khyber Pakhtunkhwa** through Chief Secretary Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
  2. **Secretary, Elementary & Secondary Education Department**, Khyber Pakhtunkhwa, Peshawar.
  3. **Director, Elementary & Secondary education Department**, Khyber Pakhtunkhwa, Peshawar.
  4. **Director, EMIS, E&SE, Khyber Pakhtunkhwa Peshawar.**
  5. **District Education Officer (Male), D.I.Khan.**
  6. **District Education Officer (Male), Orakzai.**
  7. **District Account Officer, D.I.Khan.**
  8. **Mr. Asim Saeed, Principal GHS Himmat, D.I.Khan.**

**Respondents**

Filed to-day

Registrar

31/01/2022

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AIMED AGAINST THE IMPUGNED NOTIFICATION BEARING NO. SO (SF)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 03.01.2022 WHEREBY THE APPELLANT WAS TRANSFERRED TO DISTRICT ORAKZAI AND SUBSEQUENT NOTIFICATION BEARING NO. SO (MC)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 10.01.2022

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WHEREBY THE RESPONDENT NO. 8, DESPITE HAVING TEACHING CADRE WAS TRANSFERRED AND POSTED AS DEPUTY DEO (MALE), D.I.KHAN, IN VIOLATION OF LAW, RULES AND POLICY IN VOGUE BY THE PROVINCIAL GOVERNMENT, AS NO OFFICIAL/TEACHER MAY HOLD THE POST RELATING TO ADMINISTRATION.

**PRAYER IN APPEAL**

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|  
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TO SET ASIDE/CANCEL THE IMPUGNED NOTIFICATION BEARING NO. SO (SF)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 03.01.2022 WHEREBY THE APPELLANT WAS TRANSFERRED TO DISTRICT ORAKZAI AND SUBSEQUENT NOTIFICATION BEARING NO. SO (MC)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 10.01.2022 WHEREBY THE RESPONDENT NO.8, DESPITE HAVING TEACHING CADRE WAS TRANSFERRED AND POSTED AS DEPUTY DEO (MALE), D.I.KHAN BEING ILLEGAL, NOT SUSTAINABLE IN THE EYES OF LAW, ARBITRARY, PERVERSE, TAINTED WITH MALAFIDE AND OF NO LEGAL EFFECTS AND THE APPELLANT ALLOWED TO RESUME HIS DUTY AT D.I.KHAN AS Deputy DEO (MALE), TOGETHER WITH GRANT OF ANY OTHER APPROPRIATE REMEDY THAT THIS HONOURABLE TRIBUNAL MAY DETERMINE IN THE LIGHT OF RELEVANT CIRCUMSTANCES

**Note:-** Addresses given above shall suffice the object of service



Respectfully Sheweth,

*The appellant prefers the instant appeal on the grounds hereinafter submitted apropos the following facts.*

**Concise Facts**

1. **That** the appellant is serving as Deputy District Education Officer (Male) in Education Department, Khyber Pakhtunkhwa and vide Notification dated 03.01.2022, the appellant was posted as DDEO (M) Orakzai. Due to acute medical issues, the doctor advised the appellant to avoid long journey to far-flung area. Besides, the mother and children of appellant being dependent upon appellant need regular medical treatment, in such view of the matter, it is very hard to perform my duties under the attending situation. Copy of impugned Notification dated 03.01.2022 is enclosed as **Annexure A**.
2. **That** quite apart from the above, the appellant has been performing duties and engaged with the Election Commission of Pakistan in revision of Electoral Rolls as ARO, MC, D.I.Khan (Circle 01-13) vide letter dated 21.10.2021 & Returning Officer VC/NC D.I.Khan Local Government Election 2022 vide letter dated 25.10.2021. In view of Notification by Election Commission of Pakistan dated October 25<sup>th</sup>, 2021, the ban was imposed upon transfer/posting of the Government Officers and Official including Autonomous Bodies/Authorities but the said directions issued by ECP, Pakistan have not been taken into consideration rather brushed aside and the impugned Notification dated 03.01.2022 issued by the respondents in clear violation of ban imposed for the purpose. In addition to above, the ECP, District D.I.Khan issued retention order of appellant and advised to continue his services as D.D.E.O, (Male) D.I.Khan. Copies of *duty letter dated 21.10.2021 and 25.10.2021 in ECP, D.I.Khan as ARO of appellant, Ban imposed letter dated 25.10.2021 and copy of letter dated 13.01.2022 are enclosed as **(Annexure-B,B-I, C & D)***.
3. That feeling disgruntled from letter dated 03.01.2021, the appellant preferred departmental appeal to the respondents on 06.01.2022.

Copy of departmental appeal dated 06.01.2022 is enclosed as Annexure E.

- 3
4. That during pendency of above departmental appeal dated 06.01.2022, on the vacant post of DDEO (Male) D.I.Khan, another transfer/posting order dated 10.01.2022 was issued whereby the respondent No. 8 was posted as Deputy DEO (Male), D.I.Khan who belongs to teaching cadre whereas the post of Deputy DEO (Male), D.I.Khan is purely administrative one. In this respect, Government of Khyber Pakhtunkhwa, Establishment Department issued letter dated February 8<sup>th</sup>, 2019, whereby it was directed as "***The provincial Government has taken a firm decision that all those teachers belonging to teaching cadre shall be posted in the Education Institution to teach the students according to their qualifications while those belonging to administrative cadre shall only hold the posts relating to administration***". The respondents in sheer violation of the directions issued by provincial Government, issued the impugned Notification dated 10.01.2022 Copies of the impugned Notification dated 10.01.2022 and letter dated 08.02.20219 is enclosed as Annexure-F & G.
  5. That the tenure of appellant against the post of Deputy DEO (Male), D.I.Khan is only one year, *whereas*, under the law and policy of the provisional government, an ordinary tenure of service is minimum two years at a station and transfer of a civil servant before completion of ordinary tenure, without any legal exigency has been condemned by superior Courts of Pakistan. Thus, aggrieved of his transfer, the appellant filed a representation with the Respondents against his transfer order issued premature and in defiance of the Rules/Instructions/ Policy of the government made and promulgated on the point. The representation remains unanswered till filing of the instant appeal due to inaction on the part of respondents. Copy of Departmental appeal/Revision dated 14.01.2022 is enclosed as (Annexure-H)
  6. That the appellant deserves to retain against the post of DDEO (M), D.I.Khan being most senior by virtue of seniority amongst the Management cadre Officer but this material aspect cannot be taken

into consideration by the respondents. Copy of recent seniority list of management cadre Officers is enclosed as Annexure-I.

7. That disgruntled of the impugned Notification bearing No. SO (SF)/E&SED/4-16/2021/Posting/Transfer/MC Dated 03.01.2022 whereby the appellant has been transferred to District Orakzai and subsequent Notification Bearing No. SO (MC)/E&SED/4-16/2021/Posting/Transfer/MC Dated 10.01.2022, whereby the respondent No. 8 who having teaching cadre was posted against the administrative post (DDEO), D.I.Khan on the basis of favoritism, the appellant approaches this Honourable Tribunal for redressal of his grievance on inter-alia the following grounds.

### G R O U N D S

- 3 |
- a. **That** both the impugned Notifications dated 03.01.2022 and 10.01.2022 issued on the basis of favoritism, are against the law, rules & regulations framed thereunder, thus is not maintainable and is liable to be declared void ab-initio. Besides, the impugned actions taken against the appellant are against the settled principles of law and the appellant has been made an escape goat, thus the impugned actions are liable to be set aside by this Honorable Tribunal.
- b. That it is unpleasant aspect of the case, that the tenure of the appellant against the subject post is one year, on this score too, the appellant is within his right to remain posted as Deputy DEO (Male), D.I.Khan in light of the policy of the Government of Khyber Pakhtunkhwa regulating transfer/posting of government servants. It is worthwhile to mention that under the law and policy of the Provincial Government, an ordinary tenure of the service is minimum two years at a station and transfer of a civil servant before completion of ordinary tenure,

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without any legal exigency, has been condemned by the Superior Courts of Pakistan.

c. That appellant has been made a rolling stone by official respondents just because of the fact she is not having any political backing. Besides, respondents are pressurizing the appellant to relinquish the charge of the post and handover the same to the respondent No. 8, thus, the appellant has been discriminated and victimized due to extraneous and political interference without any lawful Justification.

d. That leaving aside to take compassionate grounds, in fact, the appellant is suffering medical issues for which he is unable to proceed long journey. Moreover, the having a family including minors kids and ailing mother, it was in the interest of justice, the appellant may retain against the vacant post of DDEO (Male) D.I.Khan for the perfect reasons that here the appellant is performing his duties well without any complaint, rather the appellant also performed duties with the Election Commission of Pakistan as ARO MC, D.I.Khan, thus, in view of his efficient performance, proprietary demands that the appellant has to be retained against the post of DDEO (Male), D.I.Khan.

e. That the Rules contemplates the pavement for posting of administrative posts i.e EDO, Additional Director, Director while the members of teaching cadre would not be entitled for posting to the above mentioned posts for the perfect reason that transfer from teaching cadre to Management Cadre would frustrate the entire policy and shall devastate the appointment already made through Public Service Commission.

f. That for the purpose of administration of service, the appointing authority is under legal obligation to cause a seniority list of the member of civil service in accordance with their cadre or post because cadre is defines as *a small group of people specially trained for a*

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}

*particular purpose or profession.* In this backdrop, when the special group was created under specific cadre and that too for some special purpose in administration of service, then obviously the policy maker have to be wisdom in mind to create such posts, thus, administrative posts cannot be filled through teaching cadre.

g. That formation of Management Cadre was aimed at streamlining the affairs in offices of EDO, directorate of the E&SE. Earlier, teaching cadre were usually picked up as EDOs or any administrative post under the pressure from the political figures belonging to ruling parties but now the provincial Government introduced management cadre and banned transfer of teaching cadre into administrative cadre. On this score too, the impugned Notification dated 10.01.2022 is liable to be cancelled being illegal and void.

h. That standard of education in Pakistan is very low. There are many factors which are contributing to this phenomenon. One of these facts is the deteriorating political interference in policy making. The malafide and nepotism on the part of respondents is apparent through the fact that despite issuing Notification dated 25.10.2021 issued by the Election Commission of Pakistan, whereby the ban was imposed upon transfer/posting of Government officers and official but the said directions were brushed aside by the respondents, rather issued another Notification dated 10.01.2022 just to accommodate the respondent No. 8 who is blue-eye-cherish of official respondents. In such of the matter, both the Notifications issued by respondents are liable to struck down being illegal, void and nullity in the eye of law.

i. That it may not be out of place to mention here that the provincial Government repeatedly issued direction to the Education Department that in compliance of Policy in vogue, it was ensured that all the highly

(2)

qualified teachers shall not be posted on administrative posts because they are getting benefits as such but the students are suffering a lot. In this respect, Secretary Education Department Khyber Pakhtunkhwa, Peshawar vide office order dated 24.8.2021 direct that all postings made against cross/wrong cadre posts in teaching cadre be transferred and posted against their original posts. (Annexure-J) Needless to mention here that the apex Court in numerous judgments held that teaching cadre posts shall not be adjusted into administrative posts as it was against the system of the State. Each and every institution of the State shall remain in its own sphere as ordained in the Constitution of Islamic Republic of Pakistan, 1973.

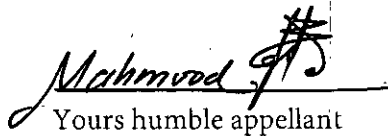
- 9/
- j. That the impugned transfer order/Notification has been issued to oblige political figures of the area and therefore the same is having no legal sanctity and no worth to be maintained.
  - k. That public officers and public functionaries are bound to obey the law rules procedure and being a public servant they are required to serve the public and it is not in their duties to bow before the politicians. Impugned Notification is therefore nullity in the eye of law and rights of appellant are required to be protected from the influence of political figures.
  - l. That the petitioner has not yet completed his ordinary tenure of the service and his transfer through impugned office order is based on malafide and is due to the political victimization, and also there are no compelling circumstances for the impugned transfer of petitioner before completion of his ordinary tenure.
  - m. That it has been held by the superior courts that when the ordinary tenure for a posting has been specified in the law or rules made

thereunder, such tenure must be respected and cannot be varied, expect for compelling reasons, which should be recorded in writing and are judicially reviewable. On this score too, the impugned transfer notification to the extent of appellant is liable to be held as illegal, void and tainted with malice on political basis.

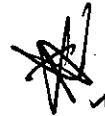
- n. It is pertinent to mention that the post for which the appellant was posted as Deputy DEO, Male Orakzai vide letter dated 03.01.2022 (already enclosed as Annexure-A) and that post was retained in favour of Mr. Zahid Ullah as Deputy DEO Male Orakzai, whereas the fate of appellant is on air. Copy of letter dated 26.01.2022 is enclosed as Annexure K.
- o. Counsel of the appellant may please be allowed to raise additional grounds at the time of arguments.

**Dated:** 30/1/2022

It is therefore, most humbly prayed that Service Appeal may please be allowed as prayed in the prayer clause of the instant Appeal.

  
Yours humble appellant

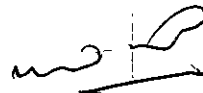
Through Counsel



*Ahmad Ali Khan*

Advocate, Supreme Court

Dated 30/1/2022



*Khalid Mehmood Sigar*

Advocate, D.I.Khan

**BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2022

Mahmood Iqbal ..... Appellant

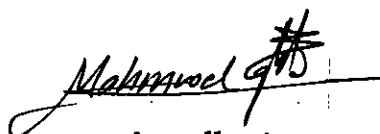
Versus

Government of K.P.K through  
Chief Secretary, Peshawar  
and others ..... Respondents

**SERVICE APPEAL**

**CERTIFICATE**

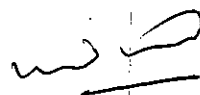
Certified that this is first appeal involving the instant subject matter and that the appellant has not filed any other appeal earlier in this Honorable Tribunal regarding the above stated controversy.



**Appellant**  
Through Counsel



**Ahmad Ali Khan**  
Advocate Supreme Court



**Khalid Mehmood Sigar**  
Advocate, D.I.Khan



**BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2022

Mahmood Iqbal ..... Appellant

Versus

Government of K.P.K through  
Chief Secretary, Peshawar  
and others ..... Respondents

**SERVICE APPEAL**

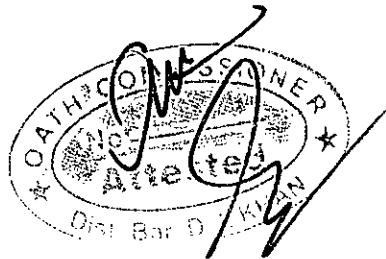
**AFFIDAVIT**

I, Mahmood Iqbal, Deputy DEO (Male), Education Department, D.I.Khan,  
do hereby solemnly affirm and declare on oath:-

1. That accompanying service appeal has been drafted by my Counsel following my instructions
2. That all para wise contents of the service appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this August Tribunal nor anything contained therein is based on exaggeration or distortion of facts.

Dated:- 30 / 1 / 2022

*Mahmood Iqbal*  
Deponent



**BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2022

Mahmood Iqbal ..... Appellant

Versus

Government of K.P.K through  
Chief Secretary, Peshawar  
and others ..... Respondents

**MEMO OF ADDRESSES OF THE PARTIES**

**APPELLANT**

Mahmood Iqbal, Deputy DEO (Male), Education Department,  
D.I.Khan.

**RESPONDENTS**

- 9. Government of Khyber Pakhtunkhwa through Chief Secretary  
Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 10. Secretary, Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar.
- 11. Director, Elementary & Secondary education Department,  
Khyber Pakhtunkhwa, Peshawar.
- 12. Director, EMIS, E&SE, Khyber Pakhtunkhwa Peshawar.
- 13. District Education Officer (Male), D.I.Khan.
- 14. District Education Officer (Male), Orakzai.
- 15. District Account Officer, D.I.Khan.
- 16. Mr. Asim Saeed, Principal GHS Himmat, D.I.Khan.

Dated:- 30/1/2022

**Counsel for appellant**



**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

Application for interim relief in  
Appeal No. \_\_\_\_\_ D of 2022

Mahmood Iqbal

Vs

Govt. of Khyber Pakhtunkhwa through  
Chief Secretary, Peshawar and others

APPLICATION FOR SUSPENSION OF THE IMPUGNED NOTIFICATION BEARING NO. SO (SF)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 03.01.2022 WHEREBY THE APPELLANT WAS TRANSFERRED TO DISTRICT ORAKZAI AND SUBSEQUENT NOTIFICATION BEARING NO. SO (MC)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 10.01.2022 WHEREBY THE RESPONDENT NO. 8, DESPITE HAVING TEACHING CADRE WAS TRANSFERRED AND POSTED AS DEPUTY DEO (MALE), D.I.KHAN AND IN THE MEANWHILE RESPONDENTS MAY ALSO BE ABSTAINED FROM TAKING ANY ACTION DETRIMENTAL TO SERVICE CAREER OF APPELLANT.

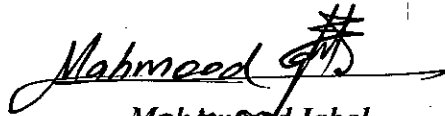
*Respectfully Sheweth,*

1. That an Appeal is being filed before this Tribunal and the grounds of same may please be considered as an integral part of this application/Petition.
2. That the applicant/appellant has got a good prima facie case on law as well as on facts and there is every likelihood of the success of present appeal, hence, balance of convenience tilts in favor of the applicant/appellant.

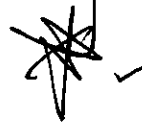
3. That the impugned transfer Notification is the outcome of nepotism whereas the subsequent Notification dated 10.01.2022 whereby respondent No. 8 was posted as DDEO (Male), D.I.Khan on the basis of political interference, which too, is nullity in the eye of law. Under the law and policy of the Provincial Government, an ordinary tenure of the service is minimum two years at a station and transfer of a civil servant before completion of ordinary tenure, without any legal exigency, has been condemned by the Superior Courts of Pakistan, therefore, in case of non-grant of interim relief, the applicant/appellant will suffer an irreparable loss and the appeal would also become fruitless.

It is, therefore, humbly prayed that on acceptance of the present application/Petition as prayed for, the operation of impugned Notification bearing No. SO (SF)/E&SED/4-16/2021/Posting/Transfer/MC dated 03.01.2022 and subsequent Notification bearing No. SO (MC)/E&SED/4-16/2021/Posting/Transfer/MC dated 10.01.2022 may very graciously be suspended till decision of the appeal in the interest of justice.

*Yours Humble petitioner/appellant*



**Mahmood Iqbal**  
Through Counsel



**Ahmad All Khan**  
Advocate Supreme Court

Dt. 30/1/2022



**Khalid Mehmood Sigar**  
Advocate, D.I.Khan

**AFFIDAVIT**

I, ~~Muhammad~~ Iqbal, Deputy DEO, (Male) in Education Department, D.I.Khan, the appellant, do hereby solemnly affirm and declare on oath that all the para-wise contents of above application/Petition are true and correct to the best of my knowledge, information and belief and that nothing has been deliberately concealed from this Hon'ble Court.



Identified by Counsel  
**Ahmad Ali Khan**  
*Advocate Supreme Court*

*Mahmood*  
Deponent





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

Dated Peshawar the January 03<sup>rd</sup>, 2022

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/2021/POSTING/TRANSFER/MC:** The Competent Authority is pleased to order the posting / transfer of the following officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest: -

Sr. No	Name & designation	From	To
1.	Mr. Mahmood Iqbal (MC BS-17)	Deputy DEO (Male) D Khan in OPS	Deputy DEO (Male) Orakzai in OPS (Vice No-4)
2.	Muhammad Riaz (MC BS-17)	SDEO (Male) Lachi Kohat	Deputy DEO (Male) Upper Kurram in OPS (Vice No-5)
3.	Mr. Liaqat Ali (MC BS-18)	Waiting for posting	Deputy DEO (Male) Lower Kurram (Vice No-6)
4.	Mr. Zahid Ullah (TC BS-18)	Deputy DEO (Male) Orakzai	Principal GHSS Manjakot Torghar against the vacant post
5.	Syed Mir Hussain (TC BS-18)	Deputy DEO (Male) Upper Kurram	Principal GHSS Samir Upper Kurram against the vacant post.
6.	Mr. Sherin Gul (TC BS-18)	Deputy DEO (Male) Lower Kurram	Principal GHS Bilyamin Lower Kurram against the vacant post.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers concerned.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers concerned.
8. Master file.

(HAPEEZ UR REHMAN SHAH)  
SECTION OFFICER (Management Cadre)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the July 30, 2020

NOTIFICATION

NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/MC: In continuation of this Department notification of even number dated 02.07.2020 the Competent Authority is pleased to withdraw the posting / transfer order in respect of Mr. Humayun Khan MC (BS-17) at Sr.No 02 against Sr.No 01 and post Mr. Melimood Iqbal, SDEO.(M) BS-17 Daraband Kalan D.I Khan against the post of Deputy District Education Officer (M) D.I.Khan in his own pay & scale.

2. No TA/DA is allowed.

SECRETARY

Endst: of even No. & Date

Copy forwarded to the:


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

(MUHAMMAD ARIF)  
SECTION OFFICER (SCHOOLS MALE)

Accepted  
↓

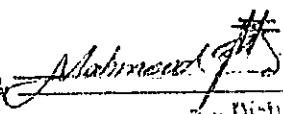
# CERTIFICATE OF TRANSFER OF CHARGE

- (1) Certified that we have on the forenoon/afternoon of this day 04/08/2020 (FN) respectively made over received as charge of DY: District Education Officer (Male) DIKhan in the office of DEO (M) DIKHAN vide Govt: Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification NO.SO(SM) E&SED/7-1/2020/Posting/Transfer/MC Dated: 30/07/2020.
- (2) Particulars cash important secret and confidential documents handed over are noted on the reverse.

Signature of relieved:   
 Government Servant: DY: District Education Officer (M) DIKHAN  
 Designation:

Station: DEO (Male) DIKhan

Dated: 04/082020 (FN)

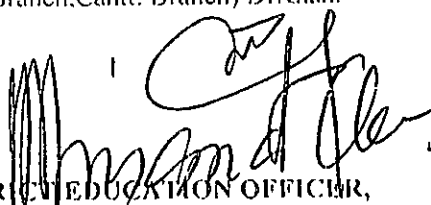
Signature of relieving   
 Government Servant: MEHMOOD IOBAL  
 Designation: DY: DISTRICT EDUCATION OFFICER (M)

Endst No. 14675-05

Dated: 05 / 08 / 2020

Copy to the: -

1. The PS to Chief Minister Khyber Pakhtunkhwa Peshawar.
2. The PS to Minister for E&SE Department Khyber Pakhtunkhwa Peshawar.
3. The PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar.
4. The Accountant General Khyber Pakhtunkhwa Peshawar
5. Director, E&SE Khyber Pakhtunkhwa Peshawar.
6. The Commissioner DIKhan.
7. The Deputy Commissioner DIKhan.
8. The District Account Officer, DIKhan .
9. The Chief Manager State Bank of Pakistan DIKhan.
10. The Manager National Bank Of Pakistan (Main Branch, Cantt. Branch) DIKhan.
11. Accountant local office.

  
 DISTRICT EDUCATION OFFICER,  
 (MALE) DERA ISMAIL KHAN  
 District Education Officer  
 (Male) DIKhan



**ELECTION COMMISSION OF PAKISTAN**

Secretariat, Constitution Avenue, G-5/2  
Islamabad, the 21st October, 2021

Annex (B)

19

**NOTIFICATION**

No.F.12(2)/2021-E/Roll(4).- In exercise of the powers conferred upon it under section 24 of the Elections Act, 2017 and in supersession of this Commission's Notification No.F.12(2)/2017-E/Rolls (2), dated the 10th January, 2018 as amended from time to time, the Election Commission of Pakistan hereby appoints for the purpose of Periodical Revision of Electoral Rolls in the **Province of Khyber Pakhtunkhwa**, the officers specified in columns 2 and 3 of the Schedule given below, to be the Registration Officers and Assistant Registration Officers respectively for electoral areas specified in the corresponding entry in column 4 of the said Schedule:

**SCHEDULE**

S.N	Registration Officer	Assistant Registration Officer	Jurisdiction
1	2	3	4
<b>District Peshawar</b>			
	District Election Commissioner, Peshawar	1 ASDEO, Mathra Circle, GPS, Mathra, Peshawar.	Qilla Shah Baig Zor Mandi Bela Mumandan Garhi Chandan Mera Mushtanka Hameed Qilla/Garhi Sher Dad Dheri Kalley Shaghali Bala Shaghali Payan Sarkhana Niarni Bela Baramad Khel Mamun Khatki Kafoor Dheri Sufaid Sung-I Ali Muhammad Banda Sufaid Sung-II Panam Dheri Feroz Pur/Umer Zai Garaha Tajik Kochian Chaghar Matti-I Chaghar Matti-II Garhi Ali Muhammad Bhatian/Shagai Bala Nissata Gul Abad Ali Zai Garanga Bala Bar Bar Charpariza/Shahinda Kaniza Chargala/Sher Abad Ghalji Kander Khel Haji Zai/Mathra Mathra Patwar Bala/Budah Kandar Khel Shahi Payan Shahi Bala-I

Abdul

Registration Officer	Assistant Registration Officer	Jurisdiction	
2	3	4	
11	ASDEO, Sud Division Wazir Utmanzai Circle	All VCs of Sub Division Wazir	
<b>District Lakki Marwat</b>			
District Election Commissioner, Lakki Marwat	1	Assistant Sub Divisional Education Officer, Landiwa	Charge 05401
	2	Assistant Sub Divisional Education Officer, Titter Khel	Charge 05402
	3	Assistant Sub Divisional Education Officer, Taja Zai	Charge 05403
	4	Assistant Sub Divisional Education Officer, Tajori	Charge 05404
	5	Assistant Sub Divisional Education Officer (Primary) O/o DEO Lakki Marwat	Charge 05405
	6	Deputy District Education Officer, O/o DEO Lakki Marwat	Charge 05406
	7	Assistant Sub Divisional Education Officer, Serai Naurang	Charge 05501
	8	Assistant Sub Divisional Education Officer, Gandhi Khan Khel	Charge 05502
<b>District North Waziristan</b>			
District Election Commissioners, North Waziristan	1	Assistant District Education Officer, Mirali	Tehsil Mirali (lower side)
	2	Assistant District Education Officer, Razmak, Dossali	Tehsil Razmak & Tehsil Dossali
	3	Assistant District Education Officer, Miranshah	Tehsil Miranshah
	4	Assistant District Education Officer, Datta Khel	Tehsil Datta Khel
	5	Assistant District Education Officer, Garyum	Tehsil Garyum
	6	Assistant District Education Officer, Shewa/Spinwam	Tehsil Spinwam & Tehsil Shewa
	7	Assistant District Education Officer, Miranshah	Tehsil Miranshah & Tehsil Ghulam Khan
	8	Principal, GHS Mirali	Tehsil Mirali (upper side)
<b>District D.I. Khan</b>			
District Election Commissioner, D.I. Khan	1	Sub Divisional Education Officer (M), Tehsil D.I. Khan	Cantt, D.I. Khan & Municipal Committee D.I. Khan (Circle-14 to 21)
	2	Deputy District Education Officer (Male), D.I. Khan	Municipal Committee D.I. Khan (Circle-01 to 13)
	3	Muhammad Hassan, SST GHSS Shorkot	Qanungo Halqa Shor Kot of Tehsil D.I. Khan
	4	Assistant Sub Divisional Education Officer (Estt-Secondary) (Male), D.I. Khan	Qanungo Halqa D.I. Khan of Tehsil D.I. Khan
District Election Commissioner, D.I. Khan	5	Assistant Sub Divisional Education Officer (Sports) (Male), D.I. Khan	Qanungo Halqa Muryali of Tehsil D.I. Khan
	6	Assistant Sub Divisional Education Officer (Male), Korai Circle	Qanungo Halqa Chehkan of Tehsil D.I. Khan
	7	Tariq Aziz, SST (General) GHSS Yarik	Qanungo Halqa Yarik of Tehsil D.I. Khan
	8	Assistant Sub Divisional Education Officer (Male), Daraban Circle	Tehsil Draban

Registration Officer	Assistant Registration Officer	Jurisdiction
2	3	4
		VC Latifay
		VC Badraga
		VC Khushal Ghar
		VC Ghawar Kalay
		VC Ghani Dheri
		VC Kopar Khas
		VC Muhammad Patay

## District Bajour

District Election Commissioner, Bajaur			
1	Assistant Sub Divisional District Education Officer, Khar Bajaur	Tehsil Khar	
2	Assistant Sub Divisional District Education Officer, Mamund Bajaur	Tehsil Mamund	
3	District Education Officer, Chamarkand, Bajaur	Teh: Chamarkand	
4	Assistant District Education Officer, Salarzal, Bajaur	Tehsil Salarzal	
5	Deputy District Education Officer, Utman Khel, Bajaur	Teh: Utmankhel	
6	Principal, GHS Loe Sam, Nawagai, Bajaur	Tehsil Nawagai	
7	Assistant District Education Officer, (Primary), Barang Bajaur O/o DEO Bajaur	Tehsil Barang	

By Order of the Election Commission of Pakistan

(Asif Ali Yasin)  
Director (Electoral Rolls)

To,

The Manager,  
Printing Corporation of Pakistan Press,  
Islamabad.

[For publication in the Gazette of Pakistan,  
Extraordinary (Part-III)]

Copy forwarded for information and necessary action to the Provincial Election Commissioner, Khyber Pakhtunkhwa, Peshawar.

(Asif Ali Yasin)  
Director (Electoral Rolls)

**NOTIFICATION**



131

Islamabad, the 25<sup>th</sup> October, 2021

**Subject:- APPOINTMENT OF DISTRICT RETURNING OFFICERS, RETURNING OFFICERS & ASSISTANT RETURNING OFFICERS IN CONNECTION WITH THE CONDUCT OF LOCAL GOVERNMENT ELECTIONS IN KHYBER PAKHTUNKHWA PROVINCE.**

/No.F.7(2)/2021-LGE-KP(Vol-I):- In exercise of powers conferred upon it under Articles 140A (2) and 219(d) of the Constitution of the Islamic Republic of Pakistan, Sections 50, 51 & 224 of the Elections Act, 2017, Rules 46 & 47 of the Elections Rules, 2017, Sections 75 & 86 of the Khyber Pakhtunkhwa Local Government Act, 2013, read with Rule-10 of the Khyber Pakhtunkhwa Local Councils (Conduct of Elections) Rules, 2021 and all other powers enabling it in that behalf, the Election Commission of Pakistan is pleased to notify herewith for general information District Returning Officers, Returning Officers & Assistant Returning Officers appointed in connection with the conduct of Local Government Elections in Seventeen (17) Districts (1<sup>st</sup> Phase) for each category of seats in City /Tehsil Councils and Village/ Neighbourhood Councils in Khyber Pakhtunkhwa Province as shown against each:-

S.No.	District Returning Officer	S.No	Returning Officer	S.No	Assistant Returning Officer	Jurisdiction
1	2	3	4	5	6	7
<b>PESHAWAR</b>						
1	Captain (R) Khalid Mahmood Deputy Commissioner, Peshawar	1	Ms. Gul Bano, Additional Deputy Commissioner, Peshawar	1	Mr. Muhammad Taj, Tehsildar City, Peshawar	Tehsil Peshawar City
				2	Arbab Zia Ul Allah, Sub Divisional Education Officer, Town-I, Peshawar	
		2	Mr. Anwar Akbar, Additional Assistant Commissioner, Shah Alam, Peshawar.	3	Mr. Imtiaz Khan, Assistant Sub Divisional Educational Officer, Daud Zia, Peshawar	Mathra Tehsil
				4	Mr. Shamsul Arifeen, ADEO, PND, Office of DEO, Peshawar.	
		3	Mr. Umar Awais Kiyani, Assistant Commissioner, Shah Alam, Peshawar.	5	Mr. Jehangir Khan, Deputy Director, HR Elementary & Secondary Education, Hayatabad, Peshawar.	Tehsil Shah Alam
				6	Mr. Wakif Khan, Tehsildar, Peshawar	

*Attested*



*Alles best*  
*W*

13	Arifullah Awan, Deputy Commissioner, D.I.Khan	254	Mehmood Iqbal, Deputy District Education Officer (Male); D.I.Khan 0341-9676140	307	Muhammad Aslam, Tehsildar, Paroa 0345-9825378	VC Jhok Qureshi VC Kotla Saidan-I VC Kotla Saidan-II VC Kotla Saidan-III VC Nawab VC Arra VC Khutti VC Kotla Habib VC Fateh VC Haji Mora-I VC Haji Mora-II
		255	Munir Ahmad, Additional Assistant Commissioner (Revenue), D.I.Khan	308	Rozi Khan, Tehsildar (Settlement), D.I.Khan.	VC Chehkan VC Pota VC Haindan VC Shero Nau VC Shero Kohna VC Korai VC Hayat Korai VC Lachra VC Zafar Abad-I VC Zafar Abad-II
		256	Abdul Qayum Shehzad, Xen Pak-PWD D I Khan	309	Dilawar Khan SS, GHSS No. 2 Silamia D I Khan	VC Giloti VC Bahadari VC Chunda VC Yarik VC Budh VC Kech VC Muqem Shah VC Girsal VC Hissam VC Saggu Janubi
		257	Khan Maluk Khan, Divisional Forest Officer (Wildlife Division), D.I.Khan	310	Sikandar Irfan, ASDEO (M/C), Mandhran Circle, D.I.Khan	VC Ratta Kulachi-I VC Ratta Kulachi-II VC Mandhra VC Kokar VC Rakh Mangan VC Kachi Paind Khan VC Shorkot VC Singhar VC Gomal VC Himmat

24

17	Mr. Ifikhar Alam, Deputy Commissioner, Bajaur	322	Mr. Muhammad Fayaz, TMO, (Khar Sub Division)	385	Mr. Muhammad Naeem, Naib Tehsildar Nawagai	VIC Shago VIC Badan Bar Kallai-I VIC Badan Lar Kallai
		323	Mr. Inamullah Dawar, DFO, Forest	386	Mr. Wisal Khan, Naib Tehsildar Wara Mamund	VIC Dabbar-I VIC Damadola VIC Mato Chenagai VIC Inamkhauro Chenagai-II VIC Bara Sewai-I VIC Tanai VIC Lar Kallai Gabarai VIC Gagra Gardi Bagh VIC Lar Kallan VIC Mina Suleman Khel VIC Nakhtar Bala VIC Ghakhei
		324	Fazal Haq, Senior Veterinary Officer, Bajour	387	Mr. Naik Zada, SDO, Building	VIC Bar Safarai VIC Sharbatani Koz Kallai VIC Bar Tarighau VIC Nazar Mina VIC Mor Darra VIC Miamool VIC Qambar VIC Tar VIC Panjora.

Allosted

2. To ensure that elections to the local governments are conducted honestly, justly, fairly in accordance with law and to ensure that the corrupt practices are guarded against, the Election Commission of Pakistan directs that no transfers/postings of the Government officers and Officials including Autonomous Bodies/Authorities, appointed as DROs, ROs and AROs shall be made without prior approval of the Commission till further orders.

By the order of the Election Commission of Pakistan

(Abdul Hafeez)  
Director (LGE)

To

The Manager,  
Printing Corporation of Pakistan Press,  
Islamabad.

25.10.2021

[For publication in the Gazette of Pakistan,  
Extraordinary (part-III) of today's date]

**I. Copy forwarded for information to the:-**

1. Secretary to the President, Aiwan-e-Sadar, Islamabad
2. Secretary to the Prime Minister, Prime Minister, Secretariat, Islamabad
3. Secretary, Cabinet Division, Islamabad
4. Secretary, Ministry of Interior Government of Pakistan, Islamabad
5. The Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar
6. The Secretary, Local Government Department, Pakhtunkhwa, Peshawar
7. The I.G Police Khyber Pakhtunkhwa

**II. Copy also forwarded for information and necessary action to the:-**

- i. The Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar
- ii. All District Returning Officers
- iii. All Returning Officers
- iv. All Regional Election Commissioner
- v. All District Election Commissioner

Through PEC, Khyber Pakhtunkhwa, Peshawar.

**III. Copy forwarded to the:-**

- i. Director to the Hon'ble CEC.
- ii. PSs / PAs to the Hon'ble MEC-I & II.
- iii. Staff Officer to the Secretary
- iv. Staff Officer to the Special Secretary.
- v. Additional Secretary (Admn).
- vi. Director General (Law).
- vii. Director General (IT)
- viii. Additional Director General (PR)
- ix. Additional Director General (Electoral Rolls).
- x. Additional Director General (TR&E).
- xi. Additional Director General (Budget).
- xii. Additional Director General (Elections-I & II).
- xiii. Additional Director General (Gender Affairs)
- xiv. Deputy Director (LGE-S)
- xv. Deputy Director (LGE-Punjab)
- xvi. Deputy Director (Cord)
- xvii. Deputy Director (GS)
- xviii. Deputy Director (PR)
- xix. Deputy Director (Budget)
- xx. Deputy Director (Monitoring)
- xxi. Deputy Director (Web) for uploading the same on ECP's website.
- xxii.

*Attested*  
*W*

*(Signature)*  
**(Abdul Hafeez)**  
Director (LGE)

**ELECTION COMMISSION OF PAKISTAN**  
**NOTIFICATION**

*Islamabad, the 25<sup>th</sup> October, 2021*

Subject:- **SCHEDULE FOR CONDUCT OF LOCAL GOVERNMENT ELECTION (FIRST PHASE) IN KHYBER PAKHTUNKHWA.**

No.F.16(1)/2021-LGE-KP:- In exercise of the powers conferred upon it under Articles 140A (2) and 219(d) of the Constitution of the Islamic Republic of Pakistan read with Section 219 of the Elections Act, 2017, sub-section (1) of Section 75 & Section-86 of the Khyber Pakhtunkhwa Local Government Act, 2013, sub-rule (1) of Rule-15 of the Khyber Pakhtunkhwa Local Councils (Conduct of Elections) Rules, 2021 and all other powers enabling it in that behalf; the Election Commission of Pakistan hereby calls upon the voters of Tehsil/City Councils, Village/ Neighbourhood Councils to elect their representatives to the seat of Mayor or Chairman and members of Village Councils/ Neighbourhood Councils of districts Malakand, Bajaur, Mardan, Swabi, Peshawar, Nowshera, Kohat, Karak, D.I.Khan, Bannu, Tank, Haripur, Khyber, Mohamand, Charsadda, Hangu and Lakki Marwat of Khyber Pakhtunkhwa Province and in connection therewith appoints the following dates of various activities of election to the aforesaid Councils:-

S#	Activity	Days	Date
1	Public Notice inviting nomination papers to be issued by the Returning Officers on	1 Day	01.11.2021
2	Dates for filing of nomination papers with the Returning Officers by the candidates	5 Days	04.11.2021 to 08.11.2021
3	Publication of names of the nominated candidates on	1 Day	09.11.2021
4	Last date for Scrutiny of nomination papers by the Returning Officer	3 Days	10.11.2021 to 12.11.2021
5	Last date for filing of appeals against decisions of the Returning Officer rejecting / accepting the nomination papers.	3 Days Excluding Sunday	13.11.2021 to 16.11.2021
6	Last date for deciding of appeals by the Appellate Tribunal	5 Days Excluding Sunday	19.11.2021
7	Publication of revised list of candidates	1 Day	20.11.2021
8	Last date for withdrawal of candidature and publication of revised list of candidates	1 Day	22.11.2021
9	Allotment of Election Symbols to contesting candidates and publication of list of contesting candidates	1 Day	23.11.2021
10	Polling day on		19.12.2021
11	Consolidation of Results	5 Days	24.12.2021

Attended  
3/



2. To ensure that elections to the Local Government are conducted honestly, justly, fairly in accordance with law and to ensure that the corrupt practices are guarded against, the Election Commission of Pakistan directs that:-

- i. All Executive Authorities in the Federation and in the Provinces shall neither announce any development project nor use State Resources in Local Government Elections calculated to influence the elections in favor of a particular candidate;
- ii. If any person in Government Service misuses his official position in any manner in order to influence results of the elections, he shall be liable to be proceeded against under the Law;
- iii. Districts in respect of which election schedule of local government elections has been issued, no transfers / postings of the Government Officers and Officials including Autonomous Bodies/ Authorities shall be made without prior approval of the Commission till the publication of election results;
- iv. After the issuance of Election Schedule, the President, Prime Minister, Chief Minister, Governor, Speaker and Deputy Speaker of any assembly, Chairman and Deputy Chairman, of Senate, Federal and Provincial Ministers, Advisors to the Prime Minister or Chief Minister or any other holder of public office shall not visit the area of any local council to announce any development scheme or to canvass or campaign for any candidate or any political party. In case if someone is resident of the district where election are being held he may visit the district however shall not take part in any kind of political activity.
- v. Districts in respect of which election schedule has been issued, no leave of the Government Officers and Officials including Autonomous Bodies/ Authorities will be granted after the issuance of Election Schedule of the Local Government Elections without prior approval of the Commission till the publication of election results. In case leave has already been sanctioned, the officer will not relinquish his charge without approval of the Hon'ble Commission;
- vi. Any holder of public office, who is found to have violated any provision of Election Laws or the instructions issued by the Election Commission, shall be proceeded against as mandated in law;

**Note:-** i. The offices of the Election Commission as well as the offices of District Returning Officers and Returning Officers shall remain open on all public holidays if any activity provided in the schedule falls on that day.


ii. All electoral activities mentioned in the aforesaid schedule shall be undertaken during office hours and the said timing will also be followed on public holidays fixed for any electoral activity of the schedule.

iii. Polling Hours will be observed from 08:00 AM to 05:00 PM.

iv. Appellate Tribunals may start proceedings of hearing/deciding of appeals simultaneously from 15.11.2021 to 19.11.2021 (Excluding Sunday on 14.11.2021)

**By the order of the Election Commission of Pakistan**

  
(Abdul Hafeez)  
Director (LGE)

  
25.10.2021

To

The Manager,  
Printing Corporation of Pakistan Press,  
Islamabad.

[For publication in the Gazette of Pakistan,  
Extraordinary (Part-III) of today's date]

Alleged  
3/

I. Copy forwarded for information to the:-

1. Secretary to the President, Aiwan-e-Sadar, Islamabad
2. Secretary to the Prime Minister, Prime Minister, Secretariat, Islamabad
3. Secretary, Cabinet Division, Islamabad
4. Secretary, Ministry of Interior Government of Pakistan, Islamabad
5. The Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar
6. The Secretary, Local Government Department, Pakhtunkhwa, Peshawar
7. The I.G Police Khyber Pakhtunkhwa

II. Copy also forwarded for information and necessary action to the:-

- i. The Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar
- ii. All District Returning Officers
- iii. All Returning Officers
- iv. All Regional Election Commissioner
- v. All District Election Commissioner

Through PEC, Khyber Pakhtunkhwa, Peshawar.

III. Copy forwarded to the:-

- vi. Director General (Admn)
- vii. Director General (Elections)
- viii. Director General (Law)
- ix. Director General (IT)
- x. Additional Director General (LGE)
- xi. Additional Director General (Budget)
- xii. Additional Director General (Admn)
- xiii. Additional Director General (E/R)
- xiv. Additional Director General (PR)
- xv. Additional Director General (Gender Affairs)
- xvi. Deputy Secretary (TR&E)
- xvii. Director (Legal)
- xviii. Director (E/R)
- xix. Director (Training)
- xx. Staff Officer to Hon'ble CEC
- xxi. Staff Officer to Worthy Secretary
- xxii. PS to Hon'ble MEC-I, II, ...
- xxiii. Deputy Director (LGE-S)
- xxiv. Deputy Director (LGE-Punjab)
- xxv. Deputy Director (LGE-Baluchistan/ICT)
- xxvi. Deputy Director (Cord)
- xxvii. Deputy Director (GS)
- xxviii. Deputy Director (PR)
- xxix. Deputy Director (Budget)
- xxx. Deputy Director (Monitoring)
- xxxi. PA to Additional Secretary (Admn)
- xxxii. PA to Additional Secretary (TR&E)
- xxxiii. Deputy Director (Web) for uploading the same on ECP's website.

ECP's Secretariat Islamabad

  
 (Abdul Hafeez)  
 Director (LGE)

Attested  
31/



No. F. 1(3)/2020-LGE (DEC)  
OFFICE OF THE  
DISTRICT ELECTION COMMISSIONER  
D.I.KHAN

(D)

(29)

Dated, January 13, 2022

To

The Deputy District Education Officer (Male)/  
Returning Officer-254 & Assistant Registration Officer,  
D.I.Khan.

Subject: - **REQUEST FOR RETENTION AGAINST THE VACANT POST OF DDEO  
(M) DIKHAN IN OPS.**

Kindly refer to your application of date regarding seeking guidance about  
relinquish or retention of charge as Deputy District Education Officer (Male), D.I.Khan.

2. In this regard, it is hereby stated that the subject case has already  
conveyed, vide this office letter of even number dated 07.01.2022, to the Provincial  
Election Commissioner, Khyber Pakhtunkhwa, Peshawar for the purpose to take up the  
instant matter with concerned authority for cancellation of your transfer order till  
culmination of Revision of Electoral Rolls and Post-Election Activities, but their response  
is still awaited.

3. In view of the above, you are therefore advised to continue your services  
as Deputy District Education Officer (Male), D.I.Khan till further orders.

(HAYATULLAH JAN)  
District Election Commissioner  
D.I.Khan

Attested  
WJ

**Copy forwarded for information and similar necessary action to:**

1. The Provincial Election Commissioner, Khyber Pakhtunkhwa,  
Peshawar for necessary action, please.
2. The Regional Election Commissioner, D.I.Khan Division, D.I.Khan.
3. The Deputy Commissioner/DRO, D.I.Khan.
4. The District Education Officer (M), D.I.Khan.

(HAYATULLAH JAN)  
District Election Commissioner  
D.I.Khan



No. F. 1(3)/2020-LGE (DEC)  
OFFICE OF THE  
DISTRICT ELECTION COMMISSIONER  
D.I.KHAN

30

Dated, January 07, 2022

To

The Provincial Election Commissioner,  
Khyber Pakhtunkhwa, Peshawar.

Subject: - REQUEST FOR RETENTION AGAINST THE VACANT POST OF DDEO  
(M) DIKHAN IN OPS.

Dear Sir,

I have the honour to enclose herewith an original application dated 5<sup>th</sup> January, 2022 on the subject noted above submitted by Mr. Mehmood Iqbal, Deputy District Education Officer (Male, D.I.Khan and to say that the said officer was appointed by the Hon'ble Election Commission of Pakistan as Returning Officer for the conduct of Local Government Elections-2021 (1<sup>st</sup> Phase) vide the Election Commission Secretariat, Islamabad Notification No.F.7 (2)/2021-LGE-KP(Vol-I) dated 25<sup>th</sup> October, 2021.

2. Besides that, he is also engaged/appointed as Assistant Registration Officer for the jurisdiction of Municipal Committee D.I.Khan (Circle-01 to 13) during the current process of Revision of Electoral Rolls, 2021-22 vide the Election Commission Secretariat, Islamabad Notification No.F.12(2)/2021-E/Rolls(4) dated 21<sup>st</sup> October, 2021.

3. Moreover, the Hon'ble Election Commission of Pakistan has imposed ban on transfer/posting till the publication of election results vide the Election Commission Secretariat, Islamabad Notification No. F. 16(1)/2021-LGE-KP dated 25<sup>th</sup> October, 2021.

4. Now, it is to inform you that Mr. Mehmood Iqbal has been transferred by the Elementary & Secondary Education Department, KP, Peshawar vide their Notification No.SO(SF)E&SED/4-16/2021/POSTING/TRANSFER/MC dated 3<sup>rd</sup> January, 2022 (copy enclosed).

5. In light of foregoing, it is therefore requested to kindly take up the instant matter with concerned authorities for immediate cancellation of the said transfer order till culmination of Revision of Electoral Rolls and post-election activities, which are currently going parallel in full swing, so as to avoid rifts in the said tasks.

Yours faithfully,

  
(HAYATULLAH JAN)

District Election Commissioner  
D.I.Khan

Copy forwarded for information and similar necessary action to:

1. The Regional Election Commissioner, D.I.Khan Division, D.I.Khan.
2. The Deputy Commissioner/DRO, D.I.Khan.
3. The District Education Officer (M), D.I.Khan.
4. The Deputy District Education Officer (M)/RO, D.I.Khan

  
(HAYATULLAH JAN)

District Election Commissioner  
D.I.Khan



No.F.16 (2)/2021-EIs (PEC) Vol-3  
OFFICE OF THE  
PROVINCIAL ELECTION COMMISSIONER  
KHYBER PAKHTUNKHWA

Email:KUMS  
Periodical of Revision of E/Rolls

31

Shahin Road Peshawar Cantt:  
January 14, 2022

The Secretary,  
Elementary & Secondary Education Department,  
Govt. of Khyber Pakhtunkhwa,  
PESHAWAR.

Subject: - BAN ON TRANSFER/POSTING OF ASSISTANT REGISTRATION OFFICERS, SUPERVISORS AND VERIFYING OFFICE APPOINTED FOR PERIODICAL REVISION OF ELECTORAL ROLLS-2021-22

Dear Sir,

I am directed to refer to the Election Commission of Pakistan (ECP), (Islamabad letter No.F.12(1)2021-ER, and Order, bearing No.F.12(1)2021-E/Rolls, both dated the 05<sup>th</sup> November, 2021, (copy enclosed), and ECP Notification No.F.7(2)2021-LGE-KP-Vol-I, dated the 25<sup>th</sup> October 2021 (copy enclosed) and to state that the Hon'ble Commission has directed both the Federal as well as Provincial Governments shall not make transfers / posting of Assistant Registration Officers, Supervisors and Verifying Officials as well as Returning Officers and Assistant Returning Officers, engaged by the Election Commission of Pakistan, in the process of Periodical Revision of Electoral Rolls and Local Govt. Elections 2021-22 respectively, in Khyber Pakhtunkhwa, till the culmination of their respective assignments.

2. However, contrary to the stated directions of the Hon'ble Election commission, Mr. Mehmood Iqbal, Deputy District Education Officer (Male), District D.I.Khan, who has been engaged /appointed as Assistant Registration Officer, Municipal Committee D.I.Khan (Circle-01 to 13) as well as Returning Officer in LGE in Khyber Pakhtunkhwa, has been transferred vide Elementary & Secondary Education Department, notification, bearing No. SO(SF)E&SED/416/2021/Posting Transfer/MC, dated the 3<sup>rd</sup> January 2022, (copy enclosed) from D.I.Khan to Orakzai. This act is clear violation of the directions of the Hon'ble Election Commission, referred to above.

STANDARD DEPARTMENT

*Copy to Assit  
Comy of Government*  
*(A) I D m*

3. It is, therefore, requested that the transfer of Mr. Mehmood Iqbal, Deputy District Education Officer (Male), who has been notified as Assistant Registration Officer, and Returning Officer, as mentioned in the preceding para, may kindly be cancelled ab-initio, under intimation to this office for onward submission to the Election Commission of Pakistan, Islamabad, so that the ongoing work of Revision of Electoral Rolls and Local Government Elections in Khyber Pakhtunkhwa could be continued smoothly and completed within time.

Yours faithfully,

Encl: As above

(KHUSHAL ZADA)  
Director (Elections)

1. Copy forwarded for information to the:-
  - i. Regional Election Commissioner, D.I.Khan.
  - ii. District Election Commissioner, D.I.Khan.
2. Copy alongwith copy of the above is also forwarded for information to the Secretary, Election Commission of Pakistan, Islamabad.

*Allotted*  
*SP*

(KHUSHAL ZADA)  
Director (Elections) 14.01.22

Transfer D.I.Khan

Annex (E)

33

To

The Secretary,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject:

REQUEST FOR RETENTION AGAINST THE VACANT POST  
OF DDEO (M) DIKHAN IN OPS

Respected Sir,

Most humbly it is earnestly submitted that I have been transferred and posted as Deputy District Education Officer (M) Orakzai through notification no. SO(S/T) F&SED/4-16/2021/posting/transfers/MC issued by your good office on 03-1-2022.

I belong to District DI Khan. I face some medical issues and the doctor advised me to avoid long journeys. I also have a family and school-going small children both require regular care, which is not possible at such a far-flung posted station.

It is further submitted that my wife is also on regular medical treatment, therefore, my family can't be shifted to my newly assigned station, while it is very difficult for me to perform my duty having medical and other issues without the support of my family.

As the post of DDEO (M) DI Khan left vacant and I also deserve to be adjusted at DI Khan District because I stand on top in Seniority from my District.

Keeping in view the above-narrated facts your good self is, therefore, requested that I may kindly be retained against my previous post (as Deputy District Education Officer DI Khan) and obliged.

Thanking you in anticipation, please.

Yours truly,

2779  
6 1 - 2022

(MAHMOOD IQBAL)  
DDEO (M) DI Khan  
(MC BS-17) in OPS  
Dera Ismail Khan  
CNIC: 12103-224717  
(Under Transferred)  
Cell # 03419676140



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

F

34

Dated Peshawar the January 10<sup>th</sup>, 2022

**NOTIFICATION**

**NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC:** The Competent Authority is pleased to order the posting/transfer of the following Management / Teaching Cadre Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest: -

Sr. No	Name & designation	From	To
1.	Mr. Asim Saeed (TC BS-18)	Principal GHS Himmat DI Khan	Deputy DEO (Male) DI Khan (AVP)
2.	Mr. Abdul Wahab (MC BS-17)	SDEO (Male) Topi Swabi	SDEO (Male) Bankand Kohistan Lower (Vice No-3).
3.	Mr. Sher Zada SST General (BS-16)	SDEO (Male) Bankand Kohistan Lower in OPS	Services placed at the disposal of DEO (Male) Kohistan Lower for further adjustment.
4.	Mr. Noor Islam (TC BS-18)	Principal GHS Dagai Swabi.	Deputy DEO (Male) Swabi (Vice No-5)
5.	Mr. Sikandar Hayat (MC BS-17)	Deputy DEO (Male) Swabi OPS	SDEO (Male) Topi Swabi (Vice No-2)
6.	Muhammad Hussain (MC BS-16)	ASDEO (Male) Takhti Nusrati Karak	SDEO (Male) Takhti Nusrati Karak (Vice No-7)
7.	Muhammad Naeem (MC BS-17)	SDEO (Male) Takhti Nusrati Karak	SDEO (Male) Mirali North Waziristan (AVP).

Affected

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No.& date:**

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Swabi and DI Khan.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Swabi and DI Khan.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
7. Officers concerned.
8. Master file.

(HAFAEZ-UR-REHMAN SHAH)  
SECTION OFFICER (Management Cadre)  
10/11/2022





GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

NO. SO (E-1)/E&AD/O-00/2010  
Dated Peshawar, the February 8, 2010

To

- 1) The Secretary to Government of Khyber Pakhtunkhwa, Higher Education Department.
- 2) The Secretary to Government of Khyber Pakhtunkhwa, E&SE Department.
- 3) The Secretary to Government of Khyber Pakhtunkhwa, Industries Department.

SUBJECT: - REQUISITIONING OF SERVICES.

Dear Sir,

I am directed to refer to the subject cited above and to say that the competent authority has observed that certain Teaching cadre officers are posted out of their cadre since long. Moreover, some teachers/professors are seeking requisitions from different Departments for posting against managerial or administrative posts, hindering deliverance of quality based education to the students. Consequently, competent authority has desired to invite your attention towards the following judgment of Peshawar High Court Peshawar ( In WP No. 2937/2009) (Copy enclosed):-

"As the Provincial Government has taken a firm decisions that all those teachers belonging to teaching cadre shall be posted in the Education Institution to teach the students according to their qualifications while those belonging to administrative cadre shall only hold the posts relating to administration. Therefore, the petitioners must deliver according to the policy of the Government and because they are highly qualified teachers, it is not befitting to hold administrative posts, because they are getting benefits, but the students are suffering thus, they shall go their respective places, where they are required to do the job.

2. In view of the above, the competent authority has desired that the above mentioned judgment of the PHC be implemented, in letter and spirit, under intimation to this Department, for perusal of Competent Authority.

Yours faithfully,

(ISHTIAQ AHMAD)  
SECTION OFFICER (Estt. I)

To  
The Worthy Secretary,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar.

(H)  
(36)

Subject: REQUEST FOR CANCELLATION OF TRANSFER NOTIFICATION  
ISSUED DATED 10-01-2022 AND 03-01-2022

Respected Sir,

Most humbly it is earnestly submitted that I have been transferred and posted as Deputy District Education Officer (M) Orakzai through Notification No. SO (SF) E&SED/4-16/2021/posting/ transfers/MC issued by your good office on 03-1-2022.

I belong to District DI Khan, I am facing some medical issues and the doctor advised me to avoid long journeys, I also have a family and school-going children, both require regular care, which is not possible at such a far-flung posted station.

It is further submitted that my wife and my mother are also dependent on me and need regular medical treatment, therefore, my family can't be shifted to my newly assigned station, while it is very difficult for me to perform my duty having medical and other issues without the support of my family.

At present I am also engaged with the *Election Commission of Pakistan* in the revision of Electoral rolls as *ARO, M.C DIKhan (Circle 01-13) & Returning Officer VC/NC DIKhan* Local Government Election 2021 and Election Commission of Pakistan is taking serious notice and wrote a letter in this regard too. (Letter of ECP Attached)

As the post of DDEO (M), DIKhan was vacant but now filled with the officer of teaching cadre which is a clear-cut violation of Honorable court judgment regarding teaching/management cadre case.

The tenure of the undersigned against this post is only one year while the minimum tenure of two years is mentioned in the policy of the Management cadre.

I also deserve to retain against the post of DDEO (M) DIKhan as in the seniority among the *management cadre officers*, the undersigned is the senior-most fellow.

It is worth mentioning here that as the Government is trying to finish the wrong posting and adjust the wrongly adjusted employees against their original posts but this is clear cut contradiction that teaching cadre officer is posted against the management cadre post.

Keeping in view the above narrated facts your good self is, therefore, requested that the issued order of teaching cadre officer vide Notification No.SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC Dated 10-01-2021 may be cancelled and I may kindly be allowed to retain against my previous post (as Deputy District Education Officer DI Khan) and obliged.

Thanking you in anticipation, please.

Yours truly,

*Mahmood*

(MAHMOOD IQBAL)  
DDEO (M) DI Khan  
(MC BS-17) in OPS  
Dera Ismail Khan  
CNIC: 12103-2247176-3  
(Under Transferred)  
Cell # 03419676140

3177  
14-1-2022



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

No 6446-6520

dated 18/02/2022

AMREC (I)  
37

To

All District Education Officers including NMD,  
Deputy Directors DCTE/PITE/NMD (Male),  
Elementary and Secondary Education Department,  
Khyber Pakhtunkhwa.

Subject: SUBMISSION OF COMPLETE PERS UPTO 2021 FOR PROMOTION FROM  
SDEO/ASSISTANT DIRECTOR (BS-17 TO DEPUTY DIRECTOR/DDEO BS-18  
MANAGEMENT CADRE)

Memo:

I am directed, to refer to the subject cited above and to ask you to submit the PERs  
alongwith Non-involvement certificate, transfer orders during the whole period, Bio-Data, Service  
Certificate, all academic and professional attested documents with covering letters from concerned DEO's  
through proper channel of the following officers who are working under your jurisdiction, for the purpose of  
promotion without further delay.

Attested

S.No	Name of Officers	D.O Birth	Place of posting	Domicile
1.	Anmir ur rehman	01-04-1979	SDEO(M) Mansehra	Mansehra
2.	Luqman Hakim	15-02-1982	SDEO(M) Takhti Nusrati Karak	Karak
3.	Malak Khan	20-04-1973	SDEO(M) Tank	SWA
4.	Shahid Hussain	17-07-1987	SDEO(M) Mustuj Upper Chitral	Chitral
5.	Dilwar Khan	04-04-1987	SDEO(M) Lachi Kohat	NWA
6.	Muqaddas Khan	10-02-1979	SDEO (M) Tor Kho Mul Kho Upper Chitral	Chitral
7.	Gul Muhammad	08-03-1971	SDEO (M) Kabul Swat	Bajour
8.	Abdul Hamid	17-04-1975	SDEO (M) Kohat	FR Kohat
9.	Kiram Shah	05-02-1978	SDEO (M) Dargoi Malakand	Malakand
10.	Maroof Khan	08-02-1974	SDEO (M) Lower Tanawal Abbottabad	Abbottabad
11.	Naseer Ahmad	02-12-1977	SDEO(M) Lora	Abbottabad
12.	Ghulam Habib	05-06-1967	SDEO (M) Smar Bagh Dir Lower	M.Agency
13.	Mehboob Ellahi	15-05-1970	SDEO Chitral	Chitral
14.	Muhanmad Farooq	03-02-1976	SDEO(M) Karak	Karak
15.	Abdul Qayum Khan	08-04-1970	SDEO Haripur	A.Abad
16.	Muhammad Zahid Khan	22-11-1973	Assistant Director	Nowshera
17.	Shamsul Islam Niaz	01-01-1978	SDEO(M) Charsadda	Charsadda
18.	Sharafat Khan	10-05-1970	SDEO (M) Chakaisar Shangla	A.Abad
19.	Mahmood Iqbal	01-12-1967	SDEO(M) Darband DI Khan	DI Khan
20.	Muhammad Irshad	16-04-1976	SDEO (M) Serai Norang Lakki	FR.Bannu
21.	Muhammad Anwar	01-03-1973	SDEO (M) Dargal Malakand	Mardan
22.	Zia ullah	19-03-1970	SDEO (M) Town-I Peshawar	Peshawar
23.	Shams Ur Rehman	15-11-1974	SDEO(M) Balakot Manshera	Mansehra
24.	Iftikhar Ahmad	25-12-1969	SDEO (M) Ghazi Haripur	A.Abad
25.	Ghulam Sarwar	21-05-1972	SDEO Batkhela Malakand	MKD
26.	Muhammad Zubair	19-07-1972	Working as Dy.DEO Charsadda	Charsada
27.	Fazli Khuda	06-01-1976	SDEO (M) katlang Mardan	Mardan
28.	Muhammad Rehman Shah	23-02-1976	SDEO(M) Bakakhel Banu	Bannu
29.	Muhammad Sohail Khan	22-03-1971	SDEO (M) Jehangira Nowshera	Nowshera
30.	Muhammad Raza Shah	18-12-1963	SDEO (M) Adenzai Dir Lower	Dir
31.	Muhammad Islam	10-04-1973	SDEO(M) Timergera Dir Lower	Dir
32.	Dil Nawaz Khan	03-01-1977	SDEO(M) BD Shah Karak	Karak
33.	Fida Muhammad	15-04-1977	SDEO (M) Town-III Peshawar	Swabi
34.	Muhammad Aftab	14-04-1978	SDEO (M) Town-II Peshawar	Nowshera
35.	Hayat Khan	15-02-1979	Assistant Director(Lit-II)	Charsada
36.	Muhammad Ajmal	02-01-1969	SDEO(M) Ogi Mansehra	Mansehra
37.	Salih Muhammad	01-01-1967	SDEO(M) Mandan Bunir	Swabi
38.	Waheed Ullah Shah	16-01-1968	SDEO(M) Kakkhi Bannu	Bannu
39.	Khalid Naseem	28-02-1976	SDEO(M) Prwa Dikhann	DI Khan

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40.	Gul Faraz	05-03-1970	DY DEO Tank in OPS	Karak
41.	Abdur Rehman Rashid	11-01-1971	SDEO(M) Serai Norang Laki Marwat	L.Marwat
42.	Abdul wahab	06-03-1971	SDEO Topi Swabi	Swabi
43.	Imtiaz Khan	08-02-1973	SDEO(M) Dir Upper	Nowshera
44.	Hameed Ullah	12-04-1974	AD(DDU) Directorate	L.Marwat
45.	Muhammad Abid	01-11-1974	SDEO Razzar Swabi	Swabi
46.	Muhammad Azam	27-12-1974	SDEO (M) Kabal Swat	MKD
47.	Raees Khan	06-09-1976	SDEO(M) Daggar Buner	Khy: Agency:
48.	Adil Muhammad	03-04-1979	SDEO(M) Khado Khel Bunner	Swabi
49.	Shah Jehan Khan	15-03-1979	Assistant Director	Peshawar

Note:

It is further stated that those officers who have been died, retired, left department, on deputation and abroad etc may clearly be indicated with exact dates/justification within three days positively.

  
Assistant Director (ACR)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst No: \_\_\_\_\_

Copy for information to the:-

1 PA Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

Assistant Director (ACR)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Attested  
30/1



39

Dated Peshawar the August 24, 2021

OFFICE ORDER

No.SO(SM) E&SED/7-1/2020/PT/E-Transfer: The Competent Authority has been pleased to decide and direct that all postings made against cross/wrong cadre posts in teaching cadre be transferred and posted against their original posts.

2. For the purpose this Department is activating e-transfer portal w.e.f 06-09-2021 to 15-09-2021 to provide an option to all teaching staff (BPS-12 to 18) excluding Subject Specialist (BS-18) and Vice Principal/Principal (BS-18) posted against wrong posts to submit applications on available vacant posts of their own cadre posts as per criteria of the online e-transfer portal.

3. It has been further decided by the competent authority that all those who do not apply or get their posting corrected shall be transferred through an automated system based on "posting non applying persons on the farthest available post."

4. The following should be considered as wrong/cross cadre posting:-

- Altaf*
- i. Subject Specialists (BS-17 & 18) posted against other Cadres/Subjects.
  - ii. Headmaster (HM)/Instructor Physical Education (IPE)/Librarian posted against Subject Specialist (SS) or any other wrong post and vice versa.
  - iii. SST posted against SCT, SDM, SAT, STT and SPET or any other wrong post and vice versa.
  - iv. SST (Science/IT) posted against SST (G) or any other wrong post and vice versa.
  - v. SST (M/P) posted against SST (B/C), (IT) or any other wrong post and vice versa.
  - vi. SCT posted against SDM, SAT, SPET, STT or any other wrong post and vice versa.
  - vii. CT posted against AT, DM, TT, PET or any other wrong post and vice versa.
  - viii. PST (BS-12) posted against PSHT or any other wrong post and vice versa.

Note:- The following is excluded from the ongoing e-transfer and will be considered in next phases:-

"District cadres teaching staff (BS-15 and below) posted in other districts than his district of appointment."

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: Even No. & Date:

Copy of the above is forwarded to the:

1. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Curriculum and Teacher Education, Khyber Pakhtunkhwa Abbottabad.
3. The Director, Directorate of Professional Development, Peshawar
4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
5. Director, EMIS, E&SE Department for uploading at official website
6. All District Education Officers (Male/Female), Khyber Pakhtunkhwa.
7. All Section Officers, E&SE Department Khyber Pakhtunkhwa, Peshawar.
8. PS to Secretary E&SE Department.
9. PS to Special Secretary E&SE Department.
10. PA to Additional Secretary (Estab) E&SE Department.
11. Office order file.

*(HAFEEZ UR REHMAN SHAH)*  
SECTION OFFICER (SCHOOLS MALE)

(K) 40

**BETTER COPY**

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDRY EDUCATION DEPARTMENT  
BLOCK "A" OPPOSITE MPA'S HOSTEL CIVIL SECRETERIAT PESHAWAR**

Dated January 26<sup>th</sup> 2022

**CORRIGENDUM:**

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC In partial modification of this department's notification of even number dated 03-01-2021 the Competent Authority is pleased to order the posting/transfer of the following officers of Elementary & Secondary Education Department, Khyber Pakhtunkhwa in the public interest: -

S. No	Name & designation	Under transfer as	To
1	Muhammad Zubair (MC BS-17)	Deputy DEO (Male) Lower Kurram	Service placed at the disposal of Directorate of E&SE Khyber Pakhtunkhwa
2	Mr Riaz Khan (MC BS-17)	Deputy DEO (Female) Upper Kurram	Retained as SDEO (Male) Lachi Kohat
3	Mr. Zahidullah (TC BS-18)	Principal GHSS Manjkot Torghar	Retained as Deputy DEO (Male) Orakzai
4	Mst. Nizakat Tabassum (MC BS-17)	Deputy DEO (Female) Mohmand	Retained as Assistant Directress, Directorate of E&SE Khyber Pakhtunkhwa
5	Mst. Shabana Bibi (MC BS-17)	Deputy DEO (Female) Upper Kurram	Retained as SDEO (Female) Thall District Hungu

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

**Endst: of even No & date:**

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male and Female) concerned
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department
5. District Accounts Officers Concerned
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
7. Officer concerned
8. Master file

**(HAFEEZ-UR-REHMAN SHAH)  
SECTION OFFICER (Management Cadre)**

OFFICE OF THE STATE CLERK







**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
 Block 'A' Opposite MPV Hotel, Civil Secretariat Peshawar

K 40

Date: 26/11/2022

**CORRIGENDUM:**

**NO. SO(MC)ESSED/3-16/2021/POSTING/TRANSFER/MC:** In partial modification of the Department's Notifications of even number dated 02/01/2021, the Competent Authority is pleased to order the posting/transfer of the following Officers of Elementary & Secondary Education Department, Khyber Pakhtunkhwa, in the public interest. -

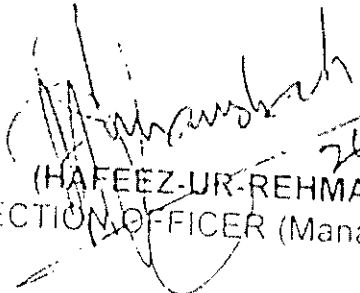
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2	Mr. Riaz Khan (MC BS-17)	Deputy DEO (Female) Upper Kurram	Retained as SDEO (Male) Lachi, Kohat.
3	Mr. Zahidullah (TC BS-18)	Principal GHSS Manjkot Torghar	Retained as Deputy DEO (Male) Orkzai.
4	Mst. Nizakat Tabassum (MC BS-17)	Deputy DEO (Female) Mohmand.	Retained as Assistant Directress, Directorate of E&SE Khyber Pakhtunkhwa.
5	Mst. Shabana Bibi (MC BS-17)	Deputy DEO (Female) Upper Kurram.	Retained as SDEO (Female) Thali District Hangu.

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

**Endst: of even No.& date:**

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male and Female) concerned.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers concerned
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
7. Officers concerned.
8. Master file.

  
 (HAFEEZ-UR-REHMAN SHAH)  
 SECTION OFFICER (Management Cadre)  
 26/11/2022



SUPREME COURT  
BAR ASSOCIATION  
PAKISTAN

91

Ahmad Ali  
Advocate



Member

وکالت نامہ

کوٹ  
فیس

President

M. Aslam  
Secretary

حکامہ ۱۷۲۲۱ سرگودھا اور

مجاہد احمد

نام گورنمنٹ ۱۷۲۲۱

محمد اقبال

دعویٰ یا جرم

صوبہ سندھ

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان شدہ اپنی طرف واسطے بیرونی وجوہات پیش یا تصدیق مقدمہ نام

احمد علی اور وکیل صاحب محمد اقبال

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بنا بذریعہ رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ بیرونی غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوائلی سیشن پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے سہولت کے آگے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا عمت نہ دالیں کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پر وادخ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذکری نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثالثی یا راضی نامہ و فیصلہ برحالیف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از کچہری صدر بیروی مقدمہ مزکور نظر ثانی اپیل گمرانی و برآمدگی مقدمہ یا منسوخی ذکری یک طرفہ یا درخواست حکم استثنائی یا قرتی یا گمرانی قبل از فیصلہ اجراء ذکری بھی صاحب موصوف کو بشرط ادا ہنگی تا بعد ملا بیروی کا اختیار ہو گا اور تمام ساختہ پروادخ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرٹر کو اپنے ہوائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دیکھ اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانب التوا پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

۱۲۰۲۲ دعویٰ مورخہ ۳۱

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھا لیا ہے اور منظور ہے

Accepted by

محمد اقبال - امین

Mahmood

**[BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRBUNAL PESHAWAR.]**

Civil Misc No. \_\_\_\_\_/2022 in  
Service Appeal No. 136/2022

Mr Mahmood Iqbal


vs

Govt of KP etc

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03	Letter Dated:10-09-2020	B & C	6-8
04	Documents related to Election Process	D, E, F and G	9-16
05	Letter for Personal Hearing Dated: 12-01-2020, Attendant Sheet and Letter Dated: 26-01-2022 regarding retention of Mr. Zahid Ullah	H, H1 and H2	17-19
06	Letter Dated: 13-01-2022 by ECP, salary slip for the month of January-February 2022 and letter dated: 08-02-2019 regarding Teaching and Management Cadre	I, I1, I2 and I3	20-23
07	Hand Written Letter Dated: 28-02-2022 in Event of Jeep Rally and copy of newspaper and Notification Dated: 04-03-2022 regarding transfer of respondent No. 02	J, J1 and J2	24-30
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Yours Humble Appellant  
Through Counsel

  
Mr Khalid Mahmood  
Advocate DIKhan

①

**[BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.]**

Civil Misc No. \_\_\_\_\_/2022 in \_\_\_\_\_  
Service Appeal No. 136/2022

Mr Mahmood Iqbal

vs

Govt of KP etc

**REJOINDER TO THE COMMENTS OF RESPONDENTS NO. 02, 03, 04 AND 05**


Respectfully Sheweth;

Appellant humbly submits the following reply to the comments of respondents.

**1. Preliminary objections**

1-13. Incorrect misconceived and thus denied. The denial of rights malafied, discrimination and malfeasance on the part of respondents provided a valid cause of action and locus standi and depriving from due rights has provided a cause of action to appellant to file present service appeal. Moreover all objection vehemently denied.

**Para-wise Reply on Facts:**

 **Para No.1.** Incorrect / Not Admitted. The appellant was posted as Deputy District Education Officer Male DIKhan by competent authority vide Notification Dated: 30-06-2020. (**Annexure A**). After this the appellant requested to honorable Secretary Elementary and Secondary Education Respondent No. 02 That if I don't come in the promotion zone of SDEOs to the post of DDEOs, I may please be adjusted against the post of SDEO in my own district. (**Annexure B & C**)

**Para No.2.** Incorrect / Not Admitted. Strongly denied. That the appellant has been performing duties and engaged with election commission of Pakistan in revision of electoral roles as ARO, MC, DIKhan circle 1-13 vide later dated: 21-10-2021 and returning officer VC/NC DIKhan local government election 2022 vide letter Dated 25-10-2021 and till dated: 08-06-2022. (**Annexure D, E, F and G**)

**Para No.3.** Incorrect / Not Admitted. Strongly denied. In the light of appeal Secretary Elementary and Secondary Education Respondent No. 02 called for personal hearing vide letter dated: 12-01-2022. (**Annexure H**) and I attended the office (**Annexure H1**) but not responded. It is pertinent to mention that where I was transferred as Deputy DEO Male Orakzai in place of Mr. Zahid Ullah, he was retained as Deputy DEO Male Orakzai vide Order Dated 26-01-2022. (**Annexure H2**).

**Para No.4.** Incorrect / Not Admitted. Strongly denied. That the ECP District DIKhan issued retention order of Appellant and advise to continue his service as DDEO Male DIKhan. (**Annexure I**). Moreover, the appellant was receiving salary from day 1 from the post of DDEO DIKhan. (**Annexure I1 – I2**).

(2)

Furthermore, respondent No. 08 was belong to Teaching Cadre and his transfer on Management Cadre Post i.e. DDEO is clear cut violation of policy of government of Khyber Pakhtunkhwa Establishment Department and Judgement of honorable courts. **(Annexure I3)**

**Para No.5.** Incorrect /Not Admitted. Strongly denied. The Appellant was posted as Deputy DEO Male DIKhan vide Notification dated: 30-07-2020 on OPS by competent authority. The Tenure of appellant as Deputy DEO DIKhan was more than 17 months and transferred to Orakzai as Deputy DEO on also OPS. **(Annexure already annexed in H2)**. It is pertinent to mention here that respondent No. 08 was posted by Secretary Elementary and Secondary Education (Respondent No. 02) on his hand written letter dated: 28-02-2022 in the event of Jeep Rally DIKhan. **(Annexure J)**. And due to his illegal activities which was on media **(Annexure J1)** and respondent No. 02 was transferred from the post of Secretary Elementary and Secondary Education vide Notification Dated: 04-03-2022. **(Annexure J2)**.

**Para No.6.** Incorrect /Not Admitted. Strongly denied. That the respondent No. 08 has been worked in District DIKhan throughout of his service.

**Para No.7.** Incorrect /Not Admitted. Strongly denied. That respondent No. 08 Mr. Asim Saeed is belong to Teaching Cadre and as well as his efficiency is clear as enquiry officer against Khan Muhammad TT is stated below

- i. The Appellant pointed out ghost teachers and informed to DEO. **(Annexure K)**
- ii. That DEO ordered on Note sheet for pay stoppage. **(Annexure K1)**
- iii. That Pay was inactive by appellant as DDEO **(Annexure K2)**
- iv. That The letter was written to the Bank Manager of Habib Bank Ltd Circular Road DIKhan. **(Annexure K3)**
- v. That from Bank Statement balance was shown as Rs. 28,57,472 **(Annexure K4)**
- vi. That the District Education Officer Male conducted enquiry committee vide letter dated: 04-08-2021 vide where Mr. Asim Saeed Teaching Cadre was appointed as member of enquiry committee. **(Annexure K5-K6)**. But till date no progress of that enquiry is reported although heavy loss Rs. 28,57,472 is occurred to government exchequer

**OBJECTION ON GROUND:**

**Para No. a.** Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above Paras which needs not to be repeated.

**Para No. b.** Incorrect /Not Admitted. Strongly denied. Reply as in the **Para No. 4**

**Para No. c.** Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the **Para 5 and Para 7**

**Para No. d.** Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the **Para 5 and Para 7**

**Para No.e.** Incorrect /Not Admitted. Strongly denied. That fitness of private respondent No. 08 is clear from **Para No. 7** also.

**Para No.f.** Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the **Para No. 4.**

**Para No.g.** Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the **Para 4 and Para 5**

**Para No.h.** Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the **Para 2**

**Para No.i.** Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the **Para 4**

**Para No.j.** Incorrect /Not Admitted. Strongly denied. Reply as disclosed in the **Para No. 4**

**Para No.k.** Incorrect /Not Admitted. Strongly denied.

**Para No.l.** Incorrect /Not Admitted. Strongly denied.

**Para No.m.** The case of appellant come in the domain of premature transfer/violation of judgment of superior courts and government policy, hence the transfer of appellant was not according to law rules and policies of government.


**Para No.n.** Incorrect /Not Admitted. Strongly denied. Reply as above **Para No. 3**

**Para No.o.** That there is no ground available to respondents to argue.

It is therefore humbly prayed that in light of above submissions, the service appeal may kindly be allowed as prayed for.

Dated: \_\_/\_\_/2022

  
Your Humble Appellant  
Through Counsel

  
Ahmad Ali Khan  
Advocate Supreme Court

  
Mr Khalid Mahmood  
Advocate DIKhan

(4)

**[BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.]**

Civil Misc No. \_\_\_\_\_/2022 in  
Service Appeal No. 136/2022

Mr Mahmood Iqbal

vs

Govt of KP etc

**AFFIDAVIT**

I Mahmood Iqbal Deputy DEO Male, the Appellant do hereby solemnly affirm and declare on oath that all the para-wise contents of above rejoinder are true and correct to the best of my knowledge, information and belief and that nothing has been deliberately concealed from this honorable tribunal.

Dated:     /     /2022

*Mahmood Iqbal*  
Deponent

12103-2247176-3

Identify by Counsel

*W. M. -  
Khalid Mehmood AAN*



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Ann - A

Dated Peshawar the July 30, 2020

NOTIFICATION

NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/MC: In continuation of this Department notification of even number dated 02.07.2020 the Competent Authority is pleased to withdraw the posting / transfer order in respect of Mr. Humayun Khan MC (BS-17) at Sr.No 02 against Sr.No 01 and post Mr. Mahmood Iqbal, SDEO (M) BS-17 Daraband Kalan D.I Khan against the post of Deputy District Education Officer (M) D.I.Khan in his own pay & scale.

2. No TA/DA is allowed.

SECRETARY

Endst: of even No. & Date

Copy forwarded to the:

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

(MUHAMMAD ARIF)  
SECTION OFFICER (SCHOOLS MALE)

Attended  
W.P.



**DISTRICT EDUCATION OFFICER (MALE) DIKHAN**No 16150Dated DI Khan the 10/09 /2020

To

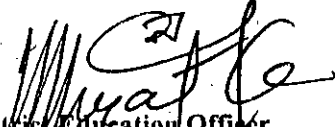
The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

Subject: **AN EARNEST REQUEST / APPEAL**

Memo:

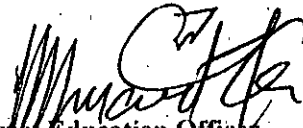
Enclosed please find herewith an explanatory letter submitted by Deputy District

Education Officer (M) DI Khan for further process.

  
District Education Officer  
(M) Dera Ismail KhanEndst 16151-52

Copy for information to:

1. Deputy District Education Officer (M) DI Khan.
2. PA to DEO (M) DI Khan

  
District Education Officer  
(M) Dera Ismail Khan

Amended  
WP

To

The Secretary,  
Elementary and Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Through: PROPER CHANNEL

Subject: AN EARNEST REQUEST /APPEAL

Honourable Sir,

With profound respect and due venerations it is very earnestly requested that I had been working as SDEO Tehsil Daraban Kalan under your kind patronage. I am really very much thankful and obliged to your good self for entrusting me the responsibility of DDEO District Dera Ismail Khan. I obeyed your kind Notification No. SO(SM) E&SED/7-1/2020/POSTING/TRANSFER/MC: Dated Peshawar the July 30, 2020 whole heartedly as I know that it's my prime responsibility to follow your kind orders.

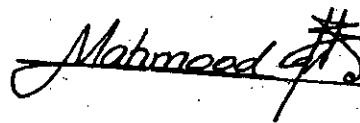
As I was the most senior SDEO in my District but in overall seniority list of SDEOs I am at Serial No.28 may be I will not fall in promotion zone from SDEO to Dy: DEO in case of proper promotion, if the undersigned cannot fall in promotion zone, then the danger of dislocation from my home district exist.

Honourable Sir,

My father had passed away and my mother always remains ill. I had to take care of family also as I am the only earning hand of my family.

It is therefore very earnestly requested that if I do not come in the promotion zone of SDEOs to the post of DDEOs, I may please be adjusted against the post of SDEO in my own district so that I might be able to perform my duties enthusiastically and whole heartedly. I will be really very much obliged and thankful to your good self for this favour.

Obediently yours,



Mahmood Iqbal,  
DDEO, District Dera Ismail Khan.





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

No. \_\_\_\_\_ / F No. 207 Posting/ Transfer

Dated: Peshawar the 9/10/2020

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department

(Ann-C)

Subject: - **AN EARNEST REQUEST/ APPEAL**

Memo:

I am directed to refer to the subject cited above and to enclose herewith an application in respect of Mr. Mahmood Iqbal, SDEO (M) posted as Deputy DEO (M) D.I Khan (in OPS) vide Notification No. SO (SM) E&SED/7-1/2020/Posting/Transfer/MC dated 30.07.2020 is requesting that he may be adjusted against his original post of SDEO in his own District with the remarks that the appellant does not fall in the promotion zone being at serial No. 28 in the seniority list of SDEOs.

The subject case is therefore, submitted to your good self for further necessary action, please.

Encl: As above.

*sd-*  
Deputy Director (Estab Male-II)  
Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa Peshawar

Endst: No. 9469

Copy forwarded to the:-

1. The District Education Officer (Male) D.I Khan w/r to his letter No. 16150 dated 10.09.2020.
2. P.A. to Director (E&SE) Local Directorate.

*mm*  
Deputy Director (Estab Male-II)  
Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa Peshawar

Handwritten notes: *AE - 1*, *DEO (M)*, *20/10/2020*


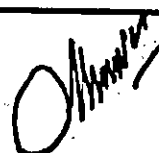
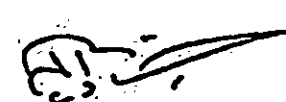


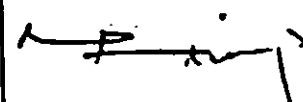
Stamp: *6601*, *20-10-2020*

Amey (D) 9

### ATTENDANCE SHEET

(Dated: 03-03-2022)

Training of Assistant Registration Officers for Periodical Revision of Electoral Rolls, 2021-22.  
verification of un-verified voters (2nd Phase)

S.No.	Name of ARO	Designation	Contact No.	Signature with date
1	M. Nabeeb Khan	ADEO (A/D)	0334 2727219 0341 2244225	
2	Shakeel Ahmad	ADEO (m)-Sports	03329638821	03/2/22
3	Hashmatullah	ADEO Kulachi	03428366646	
4	Haroon ur Rashid	ASDEO Pahrpur	0345-9830054	
5	FAZAL SUBHANI	SST. GHSS W/LALI	03467864784	
6	Tariq AZIZ	S.S.T GHSS Yank	0346-7870161	
7	M. Hassam	SST GHSS Shor Kot	0345 9847588	(11) Mar
8	Muhammad Bilal	ADEO (m) PED	03339967044	

Atash

**ATTENDANCE SHEET**

(Dated: 03-03-2022)

Training of Assistant Registration Officers for Periodical Revision of Electoral Rolls, 2021-22.  
Verification of un-verified voters (2nd Phase)

S.No	Name of ARO	Designation	Contact No.	Signature with date
9	Syed Ulfat Ali Shah	ASDEO circle Darabani Khurd	03459888811	
10	Mohammad Taqi Shah	ASDEO circle Paroa	03411022501	
11	Mahmood Iqbal	DY: DEO(M)DIK	0341-9676140	
12	Ghulam Shabbir	SST GHS Paroa	0346-9502365	
13	ISRAR AHMED	ASDEO Dharki Circle	03467849034	
14	Airjuman Khan	ASDEO Daraban Kalan	03467843512	
15				
16				

Attested



No.F.1 (26)/2021-REG (DEC)  
OFFICE OF THE  
DISTRICT ELECTION COMMISSIONER  
D.I.KHAN

Dated, May 09, 2022

**OFFICE ORDER**

In pursuance of the Provincial Election Commissioner, Khyber Pakhtunkhwa, Peshawar office letter No. F. 16 (1)/2021-EIs (PEC) dated October 08, 2021 and subsequent letter of even number dated April 25, 2022, the appointment of **123 No. Display Center Incharges**, as per ARO-Wise enclosed statements, is hereby made, to be engaged for inviting claims, objections and applications for corrections at display centers relating to the jurisdiction mentioned against each for the period of 30-days w.e.from 21-05-2022 to 19-06-2022 during the Periodical Revision of Electoral Rolls, 2021-22 in respect of District D.I.Khan.

(HAYATULLAH JAN)  
District Election Commissioner  
D.I.Khan

**Copy forwarded for information to:**

1. The Provincial Election Commissioner, KP, Peshawar.
2. The Regional Election Commissioner, D.I.Khan Division, D.I.Khan.
3. The Deputy Commissioner, D.I.Khan.
4. The District Education Officer (Male), D.I.Khan alongwith enclosure (29-Pages) for information and issuance of necessary directions to all DCIs accordingly.
5. The Revising Authorities of District D.I.Khan.
6. The Assistant Registration Officers of District D.I.Khan.

(HAYATULLAH JAN)  
District Election Commissioner  
D.I.Khan

Attested  
W.P.

5/10/22  
E  
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2. Mahmood Iqbal,  
 Deputy District Education Officer (Male) D.I.Khan/  
 ARO, M.C.D.I.KHAN (CIRCLE 01-13)

Sr. No.	Name of Display Center	Name, Designation & Contact No. of Display Center Incharge	ELECTORAL AREA	BLOCK CODE
6	Govt Primary School Basti Dhirkhan	Raza Hussain, PSHT GPS Basti Dirkhan 0340-9207078	علا میر گار / قدوس آباد	56050101
			راپڑ کھارنی / کھن کھارنی	56050102
			نیم ڈھوکھارنی / کھن کھارنی	56050103
			دین پور	56050104
			دین پور / در کھن	56050105
			سٹی در کھن	56050106
7	Govt High School No.06 D.I.Khan	Zaffar Abbas, SST (M/P) GHS No.06 D.I.Khan 0334-7211895	علا بند ڈھاکا	56050201
			علا قدوس انجم	56050202
			علا فقیر انجم / علا شکیبہ والا	56050203
			علا خانہ خیال / خانہ سندر زمان	56050205
			علا خانہ خیال	56050206
			علا بند شاہ / کھارڈھ	56050204
			علا پاشیر / خانہ بیرون	56050301
			علا پاشیر	56050302
			علا پاشیر	56050304
			علا راجی فقیر / پاشیر	56050306
			علا خانہ بیرون	56050303
			علا خانہ بیرون	56050305
			8	Govt Primary School No.06 D.I.Khan
علا چوک سید شریف / آئی گیس والی	56050402			
علا فقیر میرض	56050403			
علا ماہی بازار	56050404			
علا قاضی بازار	56050405			
علا قاضی بازار	56050406			
9	Govt Primary School No.04 D.I.Khan	Abdur Rehman, PSHT GPS No.04 D.I.Khan 0344-9400481	علا قریشی بازار / لہڑ بازار	56050501
			علا سما پٹی	56050502
			علا قریشی بازار	56050503
			علا کھارڈھ / علا جوگی بازار	56050504
			علا کھارڈھ / علا جوگی بازار	56050507
			علا جوگی بازار	56050505
			علا حلیہ	56050508
			علا حلیہ	56050509
			علا جوگی بازار	56050508
			علا حلیہ	56050508
10	Govt Primary School Faqir Abad D.I.Khan	Qasim Mudasir, PST GPS Faqir Abad D.I.Khan 0301-2073703	علا ساہی کھارڈھ	56050601
			علا ساہی کھارڈھ	56050602
			علا ساہی کھارڈھ	56050603
			علا سٹی گیس والی	56050604
			علا میر گار	56050605
			علا میر گار	56050612
			علا میر گار / نوشی پور	56050606
			علا میر گار	56050607
			علا میر گار	56050613
			علا میر گار	56050613

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HAYATULLAH JAN  
 District Election Commissioner  
 D.I.Khan

44

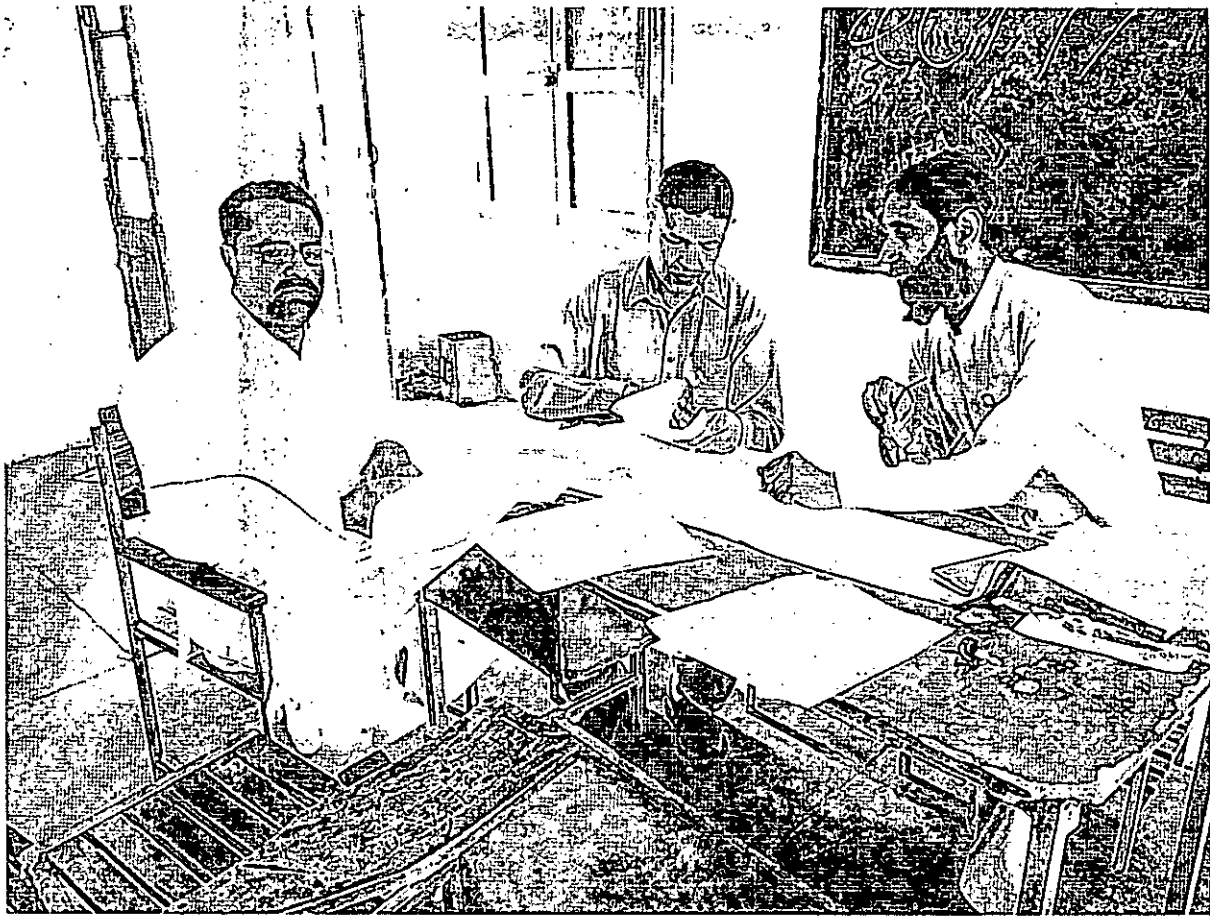
11	Govt Middle School Thaheem Abad D.I.Khan	Qamar Gul, DM GMS Thaheem Abad D.I.Khan 0345-9144230	محمد آبد	56050608
			فتت آبد / نامی کالونی	56050609
			بھاور آبد / اقبال نگر	56050610
			نھاور آبد	56050614
			شاہ جہان شہید ہاؤس / تھریا پالی	56050611
12	Govt Higher Secondary School No.03 D.I.Khan	Noor Ahmed, SST(G) GHSS No.03 D.I.Khan 0346-7879497	محمد دیوان صاحب	56050701
			محمد دیوان صاحب	56050702
			محمد گوسا پٹووالا	56050703
			محمد گوسا پٹووالا	56050704
			محمد دیوان صاحب / حیات اللہ	56050801
			محمد حضرت پال	56050802
			محمد حسن پوک	56050803
13	Govt Primary School No.10 D.I.Khan	Jamil Ahmad, PSHT GPS No.10 D.I.Khan 0346-7874664	محمد حسن پوک	56050804
			محمد نوید دلا / کڑی طبرنی	56050805
			محمد کاتریا پٹووالا / نوید پٹووالا	56050806
			محمد آسان / حیات اللہ	56050901
			محمد آسان	56050902
			پروانہ سبزی منڈی	56050903
			پہا شہ	56050904
			محمد حسین میر کالونی	56050905
			سریالی اربن	56050906
			بستی کالج پٹووالا / شیخووالی	56050907
			محمد روشن چروغ	56051001
			محمد کڑی طبرنی	56051002
			محمد کڑی طبرنی	56051003
14	Govt Middle School No.02 D.I.Khan	Muhammad Yaqoob, SST GMS No.02 D.I.Khan 0345-9889557	پوش کالونی / آئی بی ڈی کالونی	56051004
			محمد کڑی طبرنی	56051005
			محمد شہ شاہ / محمد لغاری	56051101
			محمد شہ شاہ / محمد لغاری	56051109
			محمد گاڑیان	56051102
			محمد بانج دلی / سعد آباد	56051103
			زکوری ہاؤس	56051104
			کرکھی کالونی / چاہ پھیل دلا	56051105
15	Govt College of Technology D.I.Khan	Shujaat Ali, Lecturer Govt College of Technology D.I.Khan 0334-1164186	گوشن سٹیشن کالونی / توسیف آباد	56051106
			طارق آباد / گیانی ہاؤس	56051107
			طارق آباد / گیانی ہاؤس	56051110
			گیانی ہاؤس / انجم آباد	56051108
			محمد ناصر نگر / خدیجہ راولا	56051201
			محمد شہ شاہ / ناصر نگر	56051202
			محمد خدیجہ راولا	56051203
			محمد نور علی	56051204
16	Govt Higher Secondary School No.04 D.I.Khan	Muhammad Khalid, SPET GHSS No.04 D.I.Khan 0333-9981044	محمد نور علی	56051205
			محمد کرمی سدوزئی	56051301
			محمد کرمی سدوزئی	56051302
			محمد کرمی سدوزئی	56051303
			محمد کرمی سدوزئی	56051304
17	Govt Higher Secondary School No.02 (Islamia) D.I.Khan	Muhammad Hafeez, SST GHSS No.02 (Islamia) D.I.Khan 0347-9849904	محمد کرمی سدوزئی	56051305
			محمد کرمی سدوزئی	56051305

Amir

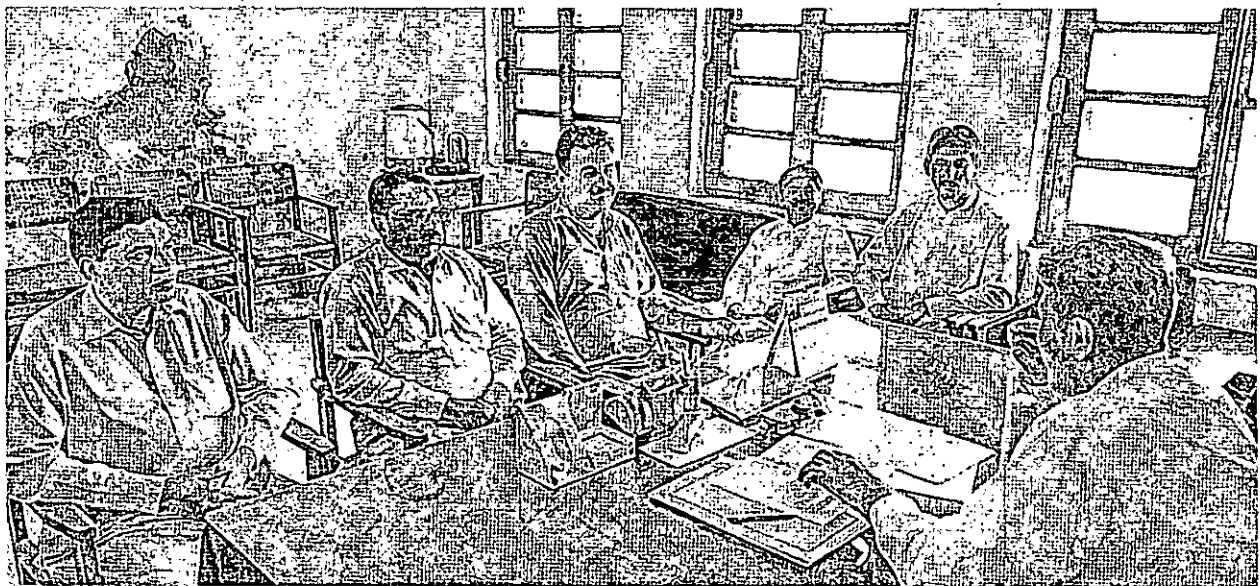
HAYAT ULLAH JAN  
District Election Commissioner  
D.I.Khan



Amey (A)  
14



Mr. Mahmood Iqbal DDEO (M) DIKhan , ARO-2, Visited today at GHSS No.04 Dikhan display centre for Electoral Rolls data rectification, Mr. Khalid Khan DCI briefed about the matter, ARO issued different directions for the smooth delivery of assignment for general public.



Tehsil DIKhan AROs meeting held in the office of Tehsil DIKhan Revising authority for discussion about Electoral Rolls data rectification process through different display centres, The chair issued different instructions & finalised schedule / channel for receiving & dispose of all types of forms within frame work.



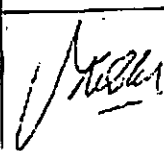
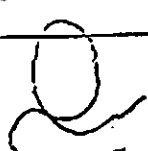
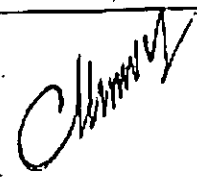

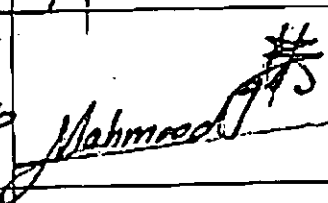
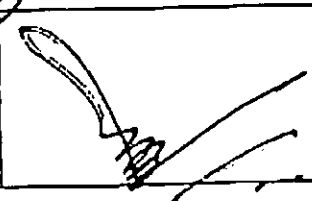
Attested  
W.D.

ANNA 9 15

**ATTENDANCE SHEET**

(Dated: 08-06-2022)

Meeting of Assistant Registration Officers during display period of Periodical Revision of Electoral Rolls, 2021-22.

S.No	Name of ARO	Designation	Contact No.	Signature with date
1	M. Hassan	SST	03459847588	
2	Haroon ur Rashid	SST/ ASDEO	0345-9882054	
3	Taviz Qari	SST	0346 7870161	
4	FAZAL SURHAWI	SST	03467864789	
5	Hashmatullah	SST/ASDEO	03428366646	
6	Ulfat Ali Shah	ASDEO	03459888811	
7	Mahmood Iqbal	DY:DEO	0341-9676140	
8	Shakeel Ahmad	ASDEO	03329638621	



**ATTENDANCE SHEET**

(Dated: 08-06-2022)

Meeting of Assistant Registration Officers during display period of Periodical Revision of Electoral Rolls, 2021-22.

S.No	Name of ARO	Designation	Contact No.	Signature with date
9	Zameer Ahmad	ASDEO (AR)	03467860910	
10	Muhammad Taj Shah	ASDEO Pando	03411022501	
11	Muhammad Saleem	ASDEO (M) <sup>City</sup> <sub>Wali</sub>	03449401601	
12	Arijumand Khan	ASDEO (M) <sup>Circle</sup> <sub>Chaudhary</sub>	03457843512	
13	Ghulam Shabir	SST	03469502365	
14	Muhammad Bilal	ADEO PED	03339967044	
15	Naseeb Khan	ADEO (PFD)	03342727 219	
16				

Attested



A-117 (17)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
**Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar**  
Phone No. 091-9223588

No. SO(MC) E&SED/4-16/2022/Personal hearing  
Dated Peshawar the January 12<sup>th</sup>, 2022.

To

1. Muhammad Zubair, Deputy DEO (Male) Mohmand.
2. Mr. Liaqat Ali, Deputy DEO (Male) Lower Kurram.
3. Syed Mir Hussain, Deputy DEO (Male) Upper Kurram.
4. Mr. Riaz Khan, SDEO (Male) Lachi, Kohat.
5. Mr. Zahidullah, Deputy DEO (Male) Orakzai.
6. Mr. Mehmood Iqbal, Deputy DEO (Male) DI Khan.
7. Mst. Shabana Bibi, SDEO (Female) Thall, District Hangu.
8. Muhammad Ashraf, Assistant Director E&SE Khyber Pakhtunkhwa.
9. Mst. Nazakat Tabassum, Assistant Directress E&SE KP
10. Muhammad Ilyas, Deputy DEO (Male) Lakki Marwat.
11. Muhammad Noor Sultan, SDEO (Male) Pharpur DI Khan.

**Subject: - APPEAL REGARDING CANCELLATION / CORRIGENDUM IN TRANSFER ORDER.**

I am directed to refer to your application regarding cancellation / corrigendum in the posting/transfer Notification was examined / processed; however, the competent authority has decided to give you an opportunity of personal hearing.

- 2- You are, therefore directed to attend office of the Additional Secretary (General/Establishment) Elementary & Secondary Education Department, Khyber Pakhtunkhwa on 14-01-2022 at 11:00 AM in his office.

  
(Hafiz-Ur-Rahman Shah)  
SECTION OFFICER (Management Cadre)

Cc to the: -

1. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
2. PA to Additional Secretary (Gen/Estab.), E&SE Department, Khyber Pakhtunkhwa.

  
SECTION OFFICER (Management Cadre)





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Anex

HQ

19

Dated Peshawar the January 26<sup>th</sup> 2022

CORRIGENDUM:

NO. SO(MC)E&SED/16/2021/POSTING/TRANSFER/MC: In partial modification of this Department's Notifications of even number dated 03-01-2021 the Competent Authority is pleased to order the posting/transfer of the following Officers of Elementary & Secondary Education Department, Khyber Pakhtunkhwa, in the public interest. -

Sr. No	Name & designation	Under transfer as	To
1.	Muhammad Zubair (MC BS-17)	Deputy DEO (Male) Lower Kurram	Services placed at the disposal of Directorate of E&SE Khyber Pakhtunkhwa.
2.	Mr. Riaz Khan (MC BS-17)	Deputy DEO (Female) Upper Kurram	Retained as SDEO (Male) Lachi, Kohat.
3.	Mr. Zahidullah (TC BS-18)	Principal GHSS Manjkot Torghar	Retained as Deputy DEO (Male) Orkazai.
4.	Mst. Nizakat Tabassum (MC BS-17)	Deputy DEO (Female) Mohmand.	Retained as Assistant Directress, Directorate of E&SE Khyber Pakhtunkhwa.
5.	Mst. Shabana Bibi (MC BS-17)	Deputy DEO (Female) Upper Kurram.	Retained as SDEO (Female) Thall, District Hunqu.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male and Female) concerned.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers concerned.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers concerned.
8. Master file.

AMC  
WJ

(HAFEEZ-UR-REHMAN SHAH)  
SECTION OFFICER (Management Cadre)  
26/1/2022



No. F. 1(3)/2020-LGE (DEC)  
OFFICE OF THE  
DISTRICT ELECTION COMMISSIONER  
D.I.KHAN

Amir

(I)  
20

Dated, January 13, 2022

To

The Deputy District Education Officer (Male)/  
Returning Officer-254 & Assistant Registration Officer,  
D.I.Khan.

Subject: - **REQUEST FOR RETENTION AGAINST THE VACANT POST OF DDEO  
(M) DIKHAN IN OPS.**

Kindly refer to your application of date regarding seeking guidance about  
relinquish or retention of charge as Deputy District Education Officer (Male), D.I.Khan.

2. In this regard, it is hereby stated that the subject case has already  
conveyed, vide this office letter of even number dated 07.01.2022, to the Provincial  
Election Commissioner, Khyber Pakhtunkhwa, Peshawar for the purpose to take up the  
instant matter with concerned authority for cancellation of your transfer order till  
culmination of Revision of Electoral Rolls and Post-Election Activities, but their response  
is still awaited.

3. In view of the above, you are therefore advised to continue your services  
as Deputy District Education Officer (Male), D.I.Khan till further orders.

(HAYATULLAH JAN)  
District Election Commissioner  
D.I.Khan

Copy forwarded for information and similar necessary action to:

1. The Provincial Election Commissioner, Khyber Pakhtunkhwa,  
Peshawar for necessary action, please.
2. The Regional Election Commissioner, D.I.Khan Division, D.I.Khan.
3. The Deputy Commissioner/DRO, D.I.Khan.
4. The District Education Officer (M), D.I.Khan.

(HAYATULLAH JAN)  
District Election Commissioner  
D.I.Khan

Amir  
W/S

**Dist. Govt: KP-Provincial**  
**District Accounts Office D.I.Khan**  
**Monthly Salary Statement (January-2022)**



Aug (T)  
 (2)

**Personal Information of Mr MEHMOOD IQBAL d/w/s of KHAIRATI KHAN**

Personnel Number: 00189899 CNIC: 1210322471763 NTN:  
 Date of Birth: 01.12.1967 Entry into Govt. Service: 17.01.1998 Length of Service: 24 Years 00 Months 016 Days

**Employment Category: Active Permanent**

Designation: DEPUTY DISTRICT EDUCATION 80001837-DISTRICT GOVERNMENT KHYBE  
 DDO Code: DI6297-

Payroll Section: 002 GPF Section: 001 Cash Center:  
 GPF A/C No: EDUDK011685 Interest Applied: Yes **GPF Balance:** 947,490.00

Vendor Number: 30428240 - MAHMOOD IQBAL SDEO ( M )

**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	60,270.00	1001	House Rent Allowance 45%	6,650.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	2,194.00
2148	15% Adhoc Relief All-2013	1,140.00	2199	Adhoc Relief Allow @10%	789.00
2211	Adhoc Relief All 2016 10%	4,020.00	2224	Adhoc Relief All 2017 10%	6,027.00
2247	Adhoc Relief All 2018 10%	6,027.00	2265	Adhoc Relief All 2019 05%	3,013.00
2309	Adhoc Relief All 2021 10%	6,027.00	2315	Special Allowance 2021	6,074.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3017	GPF Subscription	-4,270.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-3,406.00	3990	Emp.Edu. Fund KPK	-250.00
4004	R. Benefits & Death Comp:	-900.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	100,000.00	-3,000.00	64,000.00

**Deductions - Income Tax**

Payable: 37,953.83 Recovered till JAN-2022: 20,924.00 Exempted: 0.02- Recoverable: 17,029.85

**Gross Pay (Rs.): 107,231.00 Deductions: (Rs.): -13,326.00 Net Pay: (Rs.): 93,905.00**

Payee Name: MEHMOOD IQBAL  
 Account Number: PLS 5121-3  
 Bank Details: UNITED BANK LIMITED, 210637 PAHARPUR PAHARPUR,

**Leaves:** Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIKHAN

City: D.I.KHAN Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address: City: Email: mahmoodiqbal67@gmail.com

*Handwritten signature/initials*



**Dist. Govt. KP-Provincial**  
**District Accounts Office D.I.Khan**  
**Monthly Salary Statement (February-2022)**



Amro  
 22

**Personal Information of Mr MEHMOOD IQBAL d/w/s of KHAIRATI KHAN**

Personnel Number: 00189899 CNIC: 1210322471763 NTN:  
 Date of Birth: 01.12.1967 Entry into Govt. Service: 17.01.1998 Length of Service: 24 Years 01 Months 013 Days

**Employment Category: Active Permanent**

Designation: DEPUTY DISTRICT EDUCATION 80001837-DISTRICT GOVERNMENT KHYBE  
 DDO Code: DI6297-  
 Payroll Section: 002 GPF Section: 001 Cash Center:  
 GPF A/C No: EDUDK011685 GPF Interest applied **GPF Balance:** 1,027,456.00 (provisional)  
 Vendor Number: 30428240 - MAHMOOD IQBAL SDEO ( M )  
**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	60,270.00	1001	House Rent Allowance 45%	6,650.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	2,194.00
2148	15% Adhoc Relief All-2013	1,140.00	2199	Adhoc Relief Allow @10%	789.00
2211	Adhoc Relief All 2016 10%	4,020.00	2224	Adhoc Relief All 2017 10%	6,027.00
2247	Adhoc Relief All 2018 10%	6,027.00	2265	Adhoc Relief All 2019 05%	3,013.00
2309	Adhoc Relief All 2021 10%	6,027.00	2315	Special Allowance 2021	6,074.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3017	GPF Subscription	-4,270.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-3,406.00	3990	Emp.Edu. Fund KPK	-250.00
4004	R. Benefits & Death Comp:	-900.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	100,000.00	-3,000.00	61,000.00

**Deductions - Income Tax**

Payable: 37,953.80 Recovered till FEB-2022: 24,330.00 Exempted: 0.08- Recoverable: 13,623.88

**Gross Pay (Rs.): 107,231.00 Deductions: (Rs.): -13,326.00 Net Pay: (Rs.): 93,905.00**

Payee Name: MEHMOOD IQBAL  
 Account Number: PLS 5121-3.  
 Bank Details: UNITED BANK LIMITED, 210637 PAHARPUR PAHARPUR,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIKHAN  
 City: D.I.KHAN Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address:  
 City: Email: mahmoodiqbal67@gmail.com

Amro  
 22



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

23  
ANEX  
(I3)

NO. SO (E-1)/E&AD/D-BB/2019  
Dated Peshawar, the February 8, 2019

To

- 1) The Secretary to Government of Khyber Pakhtunkhwa, Higher Education Department.
- 2) The Secretary to Government of Khyber Pakhtunkhwa, E&SE Department.
- 3) The Secretary to Government of Khyber Pakhtunkhwa, Industries Department.

**SUBJECT: - REQUISITIONING OF SERVICES.**

Dear Sir,

I am directed to refer to the subject cited above and to say that the competent authority has observed that certain Teaching cadre officers are posted out of their cadre since long. Moreover, some teachers/professors are seeking requisitions from different Departments for posting against managerial or administrative posts, hindering deliverance of quality based education to the students. Consequently, competent authority has desired to invite your attention towards the following judgment of Peshawar High Court Peshawar ( in WP No. 2937/2009) (Copy enclosed):-

"As the Provincial Government has taken a firm decisions that all those teachers belonging to teaching cadre shall be posted in the Education Institution to teach the students according to their qualifications while those belonging to administrative cadre shall only hold the posts relating to administration. Therefore, the petitioners must deliver according to the policy of the Government and because they are highly qualified teachers, it is not befitting to hold administrative posts, because they are getting benefits, but the students are suffering thus, they shall go their respective places, where they are required to do the job.

2. In view of the above, the competent authority has desired that the above mentioned judgment of the PHC be implemented, in letter and spirit, under intimation to this Department, for perusal of Competent Authority.

Yours faithfully,

(SHITAO AHMAD)  
SECTION OFFICER (Estt. I)

ANEX  
23

9c

9c



GOVERNMENT OF KHYBER PAKHTUNKHWA  
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
 Block "A" Opposite MPA'S Hostel, Civil Secretariat Peshawar  
 Phone No. 931577100

ANEX (5)

(24)

Dated Peshawar the February 17<sup>th</sup> 2022

**NOTIFICATION**

NO. SO(MC)E&SE/4-16/POSTING/TRANSFER/MC: This Department's Notification of even number dated 03-01-2022 to the extent of posting/transfer Mr. Mehmood Iqbal (MC BS-17) Deputy DEO (Male) DI Khan (OPS) is hereby held in abeyance till completion of Election process at DI Khan and in light of the Khyber Pakhtunkhwa Service Tribunal Order sheet dated 31-01-2022 in Service Appeal No. 136/2022.

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

Ends: of even No. & date:

Copy forwarded for information to the:

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (Male) DI Khan and Orakzai.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. District Accounts Officers DI Khan and Orakzai.
7. Section Officer (Litigation-II) E&SE Department with the direction to pursue the case in KP Service Tribunal Peshawar till final decision.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Officer concerned.
10. Master file.

*(Signature)*  
 HAFEEZ UR-REHMAN SHAH,  
 SECTION OFFICER (Management Cadre)

DEO(M) (DI Khan)

Election process has completed and the date fixed has passed hence orders of the Tribunal have been complied and suspension of *(Name)* cancelled. The *(Name)* order is *(Status)*

*Handwritten initials/signature*

*Handwritten notes and signatures*  
 AE - 1  
 DEO (M)  
 24/02/22

*Handwritten note: plan...*

*Handwritten date: 28/2/22*



بقیہ اعتدال 10

- اسی طرح 31 جنوری کو محمود اقبال نے سرس ٹریبونل سے رجوع کرتے ہوئے اور کرنی اور ہمت سکول کے پرنسپل کا ٹرانسفر آرڈر معطل کروا دیا تھا جس کی روشنی میں محکمہ تعلیم نے 17 فروری کو محمود اقبال کے حق میں اعلامیہ جاری کر دیا۔ یاد رہے کہ پشاور ہائیکورٹ کی جانب سے واضح احکامات موجود ہیں کہ انتظامی کیڈر کی پوسٹوں پر اساتذہ کو تعینات نہ کیا جائے کیونکہ اس سے طلبہ کی تعلیم متاثر ہوتی ہے۔ تاہم مقررہ تاریخ (24 فروری) کو سرس ٹریبونل کا فیصلہ نہ ہونے کے باعث آئندہ سماعت نہ ہو سکی اور اس طرح عامم سعید نے آفس حاضری کر لی اور ساتھ ہی ایک قلم سے تحریر شدہ صفحہ جمع کرایا گیا جس پر سمینہ طور پر سیکرٹری تعلیم کی طرف سے 24 فروری کی تاریخ میں عامم سعید کے حق میں لکھا ہوا تھا جس کی روشنی میں انہوں نے چارج سنبھال لیا۔ سمینہ ذرائع نے انکشاف کیا ہے کہ ان آرڈرز کے پیچھے نقشی کا استعمال کیا گیا جس کی بھنگ وزیر اعلیٰ کو مل گئی اور اس ضمن میں وفاقی وزیر علی امین گنڈہ پور کو بھی بتایا گیا اور صوبائی وزیر تعلیم کے نام پر اس قسم کے آرڈرز جاری کیے گئے اور ان آرڈرز کو حکومتی شخصیات میں ناپسندیدگی کی نگاہ سے دیکھا گیا۔ مگر معاملہ وہیں مشکوک ہی رہ چکا ہے کہ محکمہ تعلیم نے غلط میں باقاعدہ اعلامیہ جاری نہیں کیا لہذا ایک جج پر ہی فیصلہ سنا دیا بعض اندرونی ذرائع یہ بھی بتاتے ہیں کہ یہ تحریر حالیہ ڈیرہ جات ریلی میں شرکت کے لیے ڈی آئی خان آئے ہوئے سیکرٹری تعلیم سے یہاں ڈیرہ میں لکھوائی گئی اور اس سلسلے میں باقاعدہ کوئی لیٹر جاری نہیں کیا گیا۔ جس کے باعث اسکے بومس یا اور پینل ہونے کا کچھ نہیں کہا جاسکتا اور اسکا فیصلہ عدالت میں ہی ہوگا۔ ذرائع نے دعویٰ کیا ہے کہ سابق سیکرٹری تعلیم یحییٰ اخونزادہ کو سمینہ طور پر ان کے عہدے سے اس لیے ہٹایا گیا کہ بعض بروکران کا نام لیکر اساتذہ اور افسران کی ٹرانسفر کے آرڈر مہنگے داسوں فروخت کر رہے تھے۔ سمینہ ذرائع نے یہ بتایا ہے کہ سیکرٹری کی جانب سے اس طرح سے کیے جانے والے بعض تنازعہ اور غیر قانونی طرز کے آرڈرز ان کے عہدے سے ہٹائے جانے کے سبب بنے۔ اس حوالے سے اعتدال میڈیا گروپس میں جب سابق سیکرٹری کا لکھا ہوا پیج شیئر کیا گیا تو متعلقہ حکام سخت باہو گئے اور ساتھ ہی او جھے جھکنڈے استعمال کرنے پر اتر آئے۔

استاد  
سرس

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**Abubakar Bhatti**

4h · 🌐

ریسکیو 1122 ڈیرہ جات آف روڈ چیلنج 2022

ایمرجنسی آفیسر فضل منان کا یارک ٹول پلازہ کے مقام پر  
قائم کمانڈ اینڈ کنٹرول سمیت مختلف ایمرجنسی پوائنٹس  
کا دورہ۔

سابق کمشنر ڈیرہ و سیکرٹری ایلیمنٹری اینڈ سکینڈری  
ایجوکیشن یحییٰ اخونزادہ سے ملاقات ریسکیو پلان کے  
متعلق بریفنگ دی۔

اللہ تعالیٰ



5

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Siraj Sahar is with Abubakar Bhatti.



1h

ڈی آئی خان۔

سیکرٹری ابتدائی و ثانوی تعلیم خیبرپختونخوا جناب محمد یحییٰ اخونزادہ صاحب سے مشہور صحافی اعتدال نیوز ابو بکر بھٹی ڈی آئی خان میں خوشگوار موڈ میں ملاقات اور انکو تمغہ پیش کی شکر یہ

Abubakar Bhatti

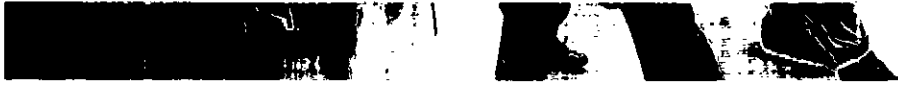


Abubakar Bhatti



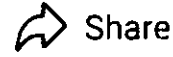
7 comments

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40

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**Abubakar Bhatti**



2d ·

سیکرٹری تعلیم محمد یحییٰ اخونزادہ ایجوکیشن آفس ڈی  
آئی خان میں ڈسٹرکٹ ایجوکیشن آفیسر مسرت حسین خان  
بلوچ اور فرزانہ سردار کے ہمراہ دفتری سٹاف سے ملاقات کر  
رہے ہیں۔

اللہ تعالیٰ  
سے







**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT**

30  
SD

Dated Peshawar March 4, 2022

**NOTIFICATION**

**NO. SO(E)MEAD/1-17/2022 (V).** The following postings/transfers of officers are hereby ordered, in the public interest, with immediate effect:-

SER.#	NAME OF THE OFFICER	FROM	TO
1.	Syed Zafar Ali Shah (PAS BS-21)	Senior Member Board of Revenue, Pakhtunkhwa	Report to Establishment Department
2.	Mr. Zahar Hussain Afridi (PCS EG BS-21)	Secretary, Labour Department	Senior Member Board of Revenue, Khyber Pakhtunkhwa vice Sr. No 1
3.	Mr. Rosh Ullah (PCS EG BS-21)	Member-II, Board of Revenue	Secretary, Labour Department vice Sr. No. 2
4.	Mr. Muhammad Arif Shah (PCS EG BS-20)	Secretary, Housing Department	Report to Establishment Department
5.	Dr. Anbar Ali Khan (PAS BS-20)	Awaiting posting in Establishment Department	Secretary, Housing Department vice Sr. No. 4.
6.	Mr. Muhammad Yahya Akhunda (PAS BS-20)	Secretary, Elementary & Secondary Education Department	Report to Establishment Department.
7.	Mr. Muzamir Bilal Shah (PMS BS-20)	Special Secretary, Local Government, Elections & Rural Dev. Department	Secretary, Elementary & Secondary Education Department Vice Sr. No. 6
8.	Mr. Muhammad Arshad (PCS SG BS-20)	Member-I Board of Revenue	Report to Establishment Department.
9.	Mr. Ghazanfar Ali (PMS BS-20)	Awaiting posting in Establishment Department	Director General, Commerce & Management Sciences, Khyber Pakhtunkhwa vice Sr. No 12
10.	Mr. Fazal Khalil (PAS BS-19)	Awaiting posting in Establishment Department	Member-I, Board of Revenue (OPB) vice Sr. No. 8
11.	Syed Muhammad Faruq (PAS BS-20)	Director General, Population Welfare Khyber Pakhtunkhwa	Member-II, Board of Revenue vice Sr. No. 3
12.	Mr. Ihsanullah (PCS EG BS-20 a.c.b.)	Director General, Commerce & Management Sciences, Khyber Pakhtunkhwa	Member-II, Board of Revenue, against the vacant post.
13.	Mrs. Ayesha Ihsan (BS-20)	Additional Director General, Population Welfare, Khyber Pakhtunkhwa	Director General, Population Welfare, Khyber Pakhtunkhwa vice Sr. No. 11.

**CHIEF SECRETARY  
GOVERNMENT OF KHYBER PAKHTUNKHWA**

**ENDST. NO. & DATE EVEN.**

Copy forwarded to the:-

1. Senior Member Board of Revenue, Khyber Pakhtunkhwa.
2. Additional Chief Secretary, P&D Department.
3. Principal Secretary to Governor, Khyber Pakhtunkhwa
4. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. Accountant General, Khyber Pakhtunkhwa.
8. Director General, Commerce & Management Sciences, Khyber Pakhtunkhwa.
9. Director General, Population Welfare Khyber Pakhtunkhwa
10. All Deputy Commissioners in Khyber Pakhtunkhwa.
11. Director (PD), Establishment Division, Islamabad.
12. Director General, Information & P.Rs Khyber Pakhtunkhwa.
13. Section Officer (E-5/PAS), Establishment Division, Islamabad.
14. PSO & PS to Chief Secretary, Khyber Pakhtunkhwa.
15. PS to Secretary (Estt)/Special Secretary (Estt)/ Special Secretary (R)/PA to AS(Estt)/AS (HRD)/ SO(Secret)/ SO(HRD-I) & SO(E-II) Establishment Deptt.
16. PS to Secretary (Admn)/AS(Admn)/D.S.(Admn)/SO(Transport)/Estate Officer/DD(TT) and ACSO Cyber Administration Department.
17. Officers concerned.
18. Manager, Govt. Printing Press Peshawar.

**SECTION OFFICER (ESTT. I)**

Scanned with CamScanner

Scanned with CamScanner

Altaf

Zia Ullah  
(ZIA.U.L.HAQ) 4/3/22



OFFICE OF THE DISTRICT EDUCATION  
OFFICER (MALE) DERA ISMAIL KHAN

Amir (K)

31

No. 12674

Dated DI Khan the 29/06/ 2021

To

The District Education Officer  
(Male) Dera Ismail Khan.

Subject: **DOUBTED STAFF**

Memo:

It is to inform to your kind honor that after the scrutiny of pay roll and other office record, the undersigned found the following persons, who are getting their salaries from the middle strength (DI 6030), but not physically exist, there are possibilities that they may be working in any other station or otherwise.

It is, therefore, requested to your good self that please guide the undersigned in above said matter. The detail is as under.

S No.	Personal No.	Name of Official	Design	BPS
01	855718	Muhammad Ijaz	DM	15
02	857455	Ahmad Kabir Shah	SST	16
03	897695	Qaim Raza Shah	SST	16
04	944200	Naeem Khan	Sweeper	03
05	201660	Khan Muhammad	TT	15

*Mahmood*  
Deputy District Education Officer  
(M) Dera Ismail Khan

Ends No. \_\_\_\_\_

Copy of the above is forwarded to:

1. The Director, Elementary & Secondary Education Department, Peshawar.
2. The Deputy Commissioner, DI Khan.
3. DEMIS local office with the directions to forward through Email to all concerned (if available)
4. PA to DEO (M) DI Khan

*Alleged*

*Sd*  
Deputy District Education Officer  
(M) Dera Ismail Khan

P. P.

AMR (K)

(32)

AS <sup>Secretary</sup> ~~Secretary~~ of the record of Middle Section, the following person seems to be doubtful. They are getting salaries from Middle Section but not exist in this regard typed draft is put up for signature and issue plan.

- 1) M. Ijaz DM.
- 2) Ahmad Kabir Shah. SST
- 3) Qaim Raza Shah. SST
- 4) Nazeem Khan Supr.
- 5) Khan Muhammad TT.

29/6/21

D.D.E/O (M)

submitted for guidance & further order please

29/6/2021

DEO

SN: 1 & 05 pay stop  
SN: 2 & 03 are performing  
duties in High Schools.  
SN: 4 is under proceeding

28/6

Attested  
W P

K 2

PAYROLL SYSTEM  
AMENDMENT FORM  
MULTIPLE EMPLOYEE ENTRY



OFFICE OF THE OFFICE OF THE DISTRICT EDUCATION OFFICER MALE DERA ISMAIL KHAN  
FOR THE MONTH OF 5/2021 200

FORM: PAY03

Date: \_\_\_\_\_

Page No.2

DDO Code 5 (Cost Center) **DI 6030** Description 6 \_\_\_\_\_

Amended  
W D

EMPLOYEE DETAILS			GENERAL DATA CHANGE		CHANGE IN PAYMENTS / DEDUCTION				Effective Date	Remarks
Personnel Number	Employee Name	NIC Number	Info Type	Field ID	Wage Type	Amount	Stop	Effective Date		
196184	NAJIB ULLAH		117	117	Pay Inactive	DUE TO PROMOTION				
201660	KHAN MUHAMMAD		117	117	Pay Inactive	DUE TO ABSENT FROM DUTIES				
855718	MUHAMMAD IJAZ		117	117	Pay Inactive	DUE TO ID ISSUE				
857455	AHMAD KABIR SHAH		117	117	Pay Inactive	DUE TO ID ISSUE				

Prepared By: \_\_\_\_\_

*[Handwritten Signature]*

Audited/Checked By: \_\_\_\_\_

Entered / Verified By: \_\_\_\_\_

(28)

Amog  
(K2)



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

Tell: 09669280128 / 09669280131

Email: emisdikhan@yahoo.com

143  
Amer (K2)

(34)

No. 16134

Dated the DI Khan 30 / 07 / 2021

To

The Manager,  
Habib Bank Ltd, Circular Road Branch (221359)  
Dera Ismail Khan.

Subject: Stoppage of Transaction in Account No. PLS 14673-2 Title Khan Muhammad

Memo:

It is brought under your kind notice that during the course of verification, the following teacher has been verified as ghost teacher, the salary of the said official has been regularly crediting in above account no., so the inquiry has been initiated in this office. The detail of the said official is as under.

S#	Personal No.	Name	Design	CNIC no.	Bank Account No.
1.	00201660	Khan Muhammad	TT	12101-0927247-9	PLS 14673-2

In this regard your good honour is requested to stop transaction in the above account no. till the completion of said inquiry process to avoid loss of Govt. exchequer

Your kind cooperation in this regard will be highly appreciated.

*Mahmood*  
DEPUTY DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

Ends No. \_\_\_\_\_

Copy for information to:-

1. The Zonal Chief Habib Bank Ltd Circular Road DI Khan.
2. The District Education Officer (M) DI Khan.
3. Master file.

DEPUTY DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

Amer

W.P.

Amef Ky

35

ACCOUNT BALANCE INQUIRY 15:28 02 AUG 2021

Account : 1358-00148732-01      KHAN MUHAMMAD  
 Customer : MBHFYJ                      KHAN MUHAMMAD  
 Account type : EC                      PLS-SAVINGS CHECKING A/C  
 Currency : PKR                          Pakistan Rupee

31JUL21 Cleared balance                      2,857,472.83  
 Reserved balance amt                      3,888,888.88                      42,527.87-

-----  
 02AUG21 NO AVAILABLE BALANCE                      42,527.87-

-----

Ledger balance                      2,857,472.83

F1=Help F3=Exit F8=Refresh F12=Previous

NO AVAILABLE BALANCE

ACCOUNT BALANCE INQUIRY 15:28 02 AUG 2021

Account : 1358-00148732-01      KHAN MUHAMMAD  
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 Reserved balance amt                      3,888,888.88                      42,527.87-

-----  
 02AUG21 NO AVAILABLE BALANCE                      42,527.87-

-----

Ledger balance                      2,857,472.83

F1=Help F3=Exit F8=Refresh F12=Previous

NO AVAILABLE BALANCE

Amef  
2/2/2

Amex (K5)

(36)



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN**

Tell: 09669280128 / 09669280131  
Email: emisdikhan@yahoo.com

No. 16464

Dated the DI Khan 09 / 8 / 2021

To:

1. Mr. Muhammad Shafique  
Principal (B-19), Govt Centennial Model High School No.1, DI Khan  
(Chairman)
2. Mr. Asim Saeed  
Principal (B-18) Govt High School Himmat, DI Khan  
(Member)

Subject: INQUIRY AGAINST KHAN MUHAMMAD TT

Memo:

During the scrutiny of pay roll and other office record, this office has found about the above mentioned official, who is getting his salary against middle strength (DI6030) but not physically exist in any school. the detail of the said official is as under.

S#	Personal No.	Name	Design	CNIC No.	Bank Account No.
1.	00201660	Khan Muhammad	TT	12101-0927247-9	PLS 14673-2

The undersigned has been pleased to constitute the committee to inquire the matter thoroughly with the directions to submit clear cut recommendation report within a week positively.

DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

Ends No. 16465-66

Copy for information to:-

1. The Deputy District Education Officer (M) DI Khan.
2. Master file.

DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

From Deputy District Education Officer,  
(Male) Dera Ismail Khan.

To The District Education Officer,  
(Male) Dera Ismail Khan.

**SUBJECT: INQUIRY AGAINST KHAN MUHAMMAD TT**

Memo:

It is submitted to your kind honor that reports about Mr. Khan Muhammad TT having Personal Number 00201660 & CNIC# 121010927247-9 and Bank Account No. PLS 14673-2 was submitted by the undersigned and your good-self initiated an inquiry through the inquiry committee consisting of (Mr. Muhammad Shafiq Principal GCMHS No.1 and Mr. Asim Saeed Principal GHS Himmat) with the direction to submit the report within one week positively vide letter No.16464 dated 04.08.2021 (Copy attached for ready reference).

The undersigned has stopped the salary and through various correspondents it has been tried to stop transaction from the concerned Bank (Copies of all letters attached) but neither the bank has honored the matter nor the inquiry committee has submitted his reports even passage of more than nine months.

Respected Sir,

It is a very serious matter and the loss of millions of rupees may be expected in the Government exchequer due to laziness and sluggish attitudes.

It is humbly requested prompt action is the need of the day to resolve this issue on a priority basis in the best interest of the Department.

*Mahmood #*  
13/04/2022  
DEPUTY DISTRICT EDUCATION OFFICER  
(M) DERA ISMAIL KHAN

Copy is forwarded to the:-

1. Deputy Commissioner DI Khan.
2. District Monitoring Officer (EMA) DI Khan.

*Recd*  
14/4/22

*AMestd*  
3/3

Amex *K6*  
*37*

*Received*  
*14/04/22*



KHALID MEHMOOD

Advocate  
hc-15-5415  
Date of Issue: October 2020  
Valid upto: October 2023



ADVOCATE

وکالت نامہ

Secretary  
KP Bar Council



غائب کپک سروس ایس جیول کیشاور  
محمد اقبال  
گورنمنٹ کپک

سروس ایس

باعث تحریر

محمد اقبال سروس ایس جیول کیشاور

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ذمہ بڈریو رو برد عدالت حاضر ہونا دعویٰ کا اور ہر وقت نکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پرودی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت آونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا ایسکے واسطے کسی معاوضہ کے ادا کرنے یا عمت نہ داخل کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے بھہ لوش ساخت پر وادخ صاحب موصوف اٹل کر دو ذات، خود منظور قبول ہونا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اجناسہ ڈگری نظر ثانی اپیل ترقی و ہرجم درخواست ہرجم کے بیان دینے ایڈز پر تالی یا دہشی نامہ و فیصلہ بظلمت کرنے اقبال دعویٰ کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ پیش مقدمہ ہرجم بیرون از پکھری صدر بیرونی مقدمہ مرکز نظر ثانی اپیل و ترقی و ہرجم مقدمہ یا مسوئی ڈگری یک طرفہ یا درخواست عم انتہائی یا ترقی یا گرفتاری نقل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط اراٹنگی علیحدہ علیحدہ بھی اختیار ہوگا اور تمام ساخت پر وادخ صاحب موصوف مل کر دو از خود منظور و قبول ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مزکورہ یا اس کے کسی جزو کی تازوئی یا بصورت درخواست نظر ثانی اپیل ترقی یا دیگر اجراء و قدمہ مذکورہ کسی دوسرے وکیل یا ہرجم کو ایسے جوائنٹ یا ایسے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ایسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں نہ کچھ ہر جہت التوا پڑے گا وہ صاحب موصوف کا حق ہوگا مگر صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو اپنا اختیار ہوگا کہ مقدمہ کی پروڈا نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لنا وکالت نامہ لکھو یا ہے تاکہ مندر ہے  
29  
مورخہ  
مضمون وکالت نامہ میں ایسے اور ایسے تاریخ لکھ لیا ہے اور منظور ہے

محمد اقبال - ایس جیول کیشاور

Mahmood

Accepted