

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1408/2017

BEFORE: SALAH UD DIN --- MEMBER(J)
MIAN MUHAMMAD --- MEMBER(E)

Khursheed S/o Noushad R/o Village Takar, Takht Bhai, Mardan
..... (*Appellant*)

VERSUS

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
 2. District Education Officer (Male), Mardan.
 3. Director NTS, Peshawar.
 4. Sub Divisional Education Officer (Male) Takht Bhai, Mardan.
- (*Respondents*)

Present:

IFRAN ALI YOUSAFZAI
Advocate

--- For Appellant.

MUHAMMAD RIAZ KHAN PAINDAKHEL,
Assistant Advocate General

--- For respondents.

Date of Institution.....19.12.2017
Date of Hearing.....16.09.2022
Date of Decision16.09.2022

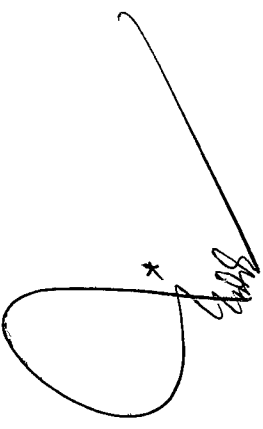
JUDGEMENT.

MIAN MUHAMMAD, MEMBER(E):- The instant service appeal has been filed against the impugned order dated 25.07.2016 of respondent No. 2 whereby appointment Notification of the appellant dated 25.03.2016 was withdrawn which is assailed in the appeal for adjudication before us.

02. Brief facts of the case are that the appellant applied for the post of PST (Primary School Teacher BS-12) and qualified the test conducted by the NTS. On the basis of results declared by the NTS, he was appointed as adhoc PST for one year through a consolidated Notification of 427 appointees on 25.03.2016 in pursuance of which the appellant assumed duty at GPS Pati Khurd Takht Bhai, Mardan on

26.03.2016. Later on, on the charge of impersonation in NTS test, appointment Notification in respect of the appellant was withdrawn by respondent No.2 vide office order dated 25.07.2016. Departmental appeal of the appellant submitted to respondent No. 1 on 18.08.2016, was not responded within the statutory period whereafter, he approached the Service Tribunal through the instant service appeal for redressal of his grievances.

03. On admission of the service appeal in preliminary hearing on 08.01.2018, the respondents were put on notice to submit written defence through reply/para-wise comments. Reply/Parawise comments were submitted on 19.09.2019. We have heard learned counsel for the appellant as well as learned Assistant Advocate General for the respondents and gone through the record carefully with their valuable assistance.



04. Learned counsel for the appellant argued that the appellant appeared in person in the NTS test and qualified it by securing 125.33 marks. The appellant after due process and procedure of NTS was declared successful on the basis of which he was appointed against the vacant post of PST in his union Council Takkar vide Notification dated 25.03.2016. He assumed the charge and started performing his duty on 26.03.2016 when all of a sudden the impugned office order dated 25.07.2016 was received to the appellant whereby his appointment order was withdrawn. He vehemently contended that the impugned order is against law, facts, norms of natural justice and material on record. No proper enquiry has been conducted and no Show Cause Notice has ever been served on the appellant being mandatory provisions of law before imposition of the major penalty.

The appellant has not been associated with any enquiry proceedings and the impugned order has been passed on his back in violation of Article 10-A of the constitution. He relied on Service Tribunal judgement of identical case having the same facts and circumstance, delivered on 01.12.2020 in service appeal No. 1242/2017 of Owais Khan S/o Rehmat Said (Ex-PST) versus District Education Officer, Mardan and five others.

05. Learned Assistant Advocate General on the other hand, contended that the appellant has managed to utilize another unknown person as impersonator to appear in the NTS test in his place. The person though resembled the appellant in appearance but from every angle was different from the appellant. Specimen signatures of the appellant and signature put in the NTS attendance sheet during the test are totally different from each other. Moreover, the appellant was given the opportunity of personal hearing as per law but he failed to defend himself. The appeal being devoid of merit may graciously be dismissed with costs, he concluded.

06. On careful study of the record, it is evident and transpires that the appellant applied for the post of PST (BS-12) on 24.08.2015 and the NTS issued him Roll No. 452600878. The appellant as per "Attendance sheet candidates" dated 28.11.2015 is marked as present with signature in the relevant column of the attendance sheet. The Principal GHS Babuzai Katlang Mardan in his capacity as enquiry officer submitted an enquiry report to respondent No. 1 on 07.06.2016 in pursuance of Notification dated 17.05.2016 but copy of the said Notification is not attached with the enquiry report to assertion as to what were the "terms of reference" and against whom the enquiry was

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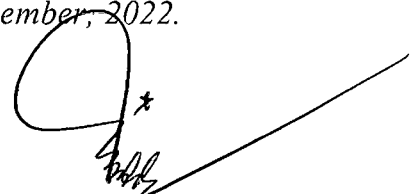
ordered to be conducted? NTS being the custodian of record including video recording of NTS test conducted on 28.11.2015 does not seem to have been associated with enquiry proceedings rather it appears that only reliance has been made on the record provided by NTS. Moreover, letter written by respondent No. 1 to DPO Mardan on 06.08.2016 for registration of FIR (for impersonation) against 09 candidates including the appellant, does not seem to have been acted upon or reached to a logical conclusion as the Assistant Advocate General could not clarify it during course of the arguments.

07. As a sequel to the above, we have arrived at the conclusion that the opportunity of fair trial has not been afforded to the appellant being his fundamental and inalienable right under Article-4 and 25 of the Constitution. He has been prematurely convicted in the instant case which is against the canons of law and natural justice. The impugned order dated 25.07.2016 is therefore set aside with the directions to the respondents to conduct denovo enquiry associating NTS as necessary party, to be concluded within three months from communication of copy of this judgement strictly in accordance with law and rules. Parties are left to bear their own costs. File be consigned to the record room.

08. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 16th day of September, 2022.*



(SALAH UD DIN)
MEMBER (J)



(MIAN MUHAMMAD)
MEMBER (E)

ORDER

16.09.2022

Mr. Irfan Ali Yousafzai, Advocate for the appellant present.

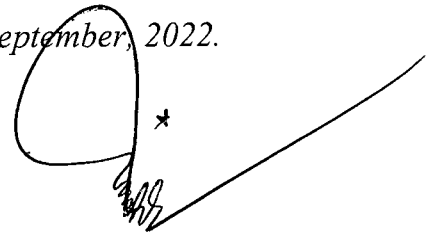
Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

02. Vide our detailed judgement of today separately placed on file containing (04) pages, we have arrived at the conclusion that the opportunity of fair trial has not been afforded to the appellant being his fundamental and inalienable right under Article-4 and 25 of the Constitution. He has been prematurely convicted in the instant case which is against the canons of law and natural justice. The impugned order dated 25.07.2016 is therefore set aside with the directions to the respondents to conduct denovo enquiry associating NTS as necessary party, to be concluded within three months from communication of copy of this judgement strictly in accordance with law and rules. Parties are left to bear their own costs. File be consigned to the record room.

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(SALAH UD DIN)
MEMBER (J)



(MIAN MUHAMMAD)
MEMBER (E)

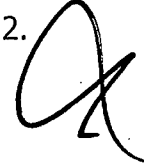
10.05.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Learned counsel for the appellant requested for adjournment in order to assist the Tribunal. Last opportunity is granted. To come up for arguments before the D.B on 20.07.2022.



(Fareeha Paul)
Member (E)



Chairman

20.07.2022

Appellant present in person.

Mr. Muhammad Riaz Khan Paindakhel, learned Assistant Advocate General for respondents present.

Appellant requested for adjournment as his counsel is not available today. Adjourned. To come up for arguments on 16.09.2022 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

13.09.2021

Counsel for the appellant present. Mr. Javedullah, Asst: AG alongwith Mr. Sajid, ADEO (Litigation) for respondents present.

On previous date the case was adjourned through Reader note, therefore, notice of prosecution of appeal be issued to the respondents particularly respondent No.3. Adjourned. To come up for arguments on 07.12.2021 before the D.B.



(Mian Muhammad)
Member(E)

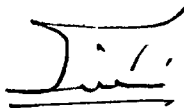


(Atiq-Ur-Rehman Wazir)
Member(E)


07.12.2021

Counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present,

Learned counsel for the appellant seeks time for preparation. Request is accorded. To come up for arguments on 20.01.2022 before the D.B.



(Salah-ud-Din)
Member(J)



Chairman

20.01.2022

Clerk to counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

Clerk to counsel for the appellant requested for adjournment on the ground that counsel for the appellant is not available today due to general strike of the bar. Adjourned. To come up for arguments before the D.B on 10.05.2022.



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



Chairman

23.11.2020

Due to non-availability of D.B, the case is adjourned to 03.02.2021 for the same as before.

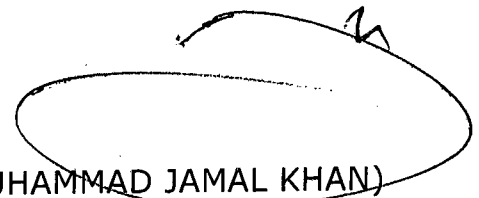

Reader

03.02.2021

Counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Sajid, ADEO (Litigation) for the respondents are also present.

As a result of involvement of question of retrospectivity in the instant lis we are unable to hear arguments as the issue is pending adjudication in the Larger Bench of this Tribunal constituted for the purpose. Till a judgment is made, the instant appeal is adjourned to 29.03.2021 on which date file to come up for further proceedings before D.B.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

29.03.2021

The concerned D.B is not available today, therefore, the appeal is adjourned to 21.05.2021 for the same.

21.5.21

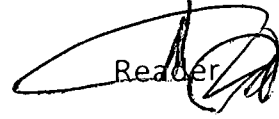
Due to COVID-19, the case is adjourned to 13.9.21 for the same.


Reader


Reader

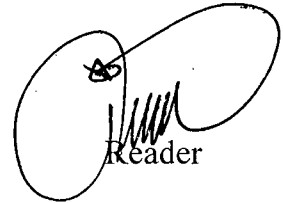
11.5.2020

Due to COVID19, the case is adjourned to
4/8/2020 for the same as before.


Reader

04.08.2020

Due to summer vacation case to come up for the same on
05.10.2020 before D.B.



Reader

05.10.2020

Nemo for parties.

Mr. Kabir Ullah Khattak learned Additional Advocate
General present.

Perusal of record would reveal that preceding two
dates were adjourned on a reader's note, therefore,
case is adjourned to 23.11.2020 before D.B, subject to
notice to both the parties.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

Service Appeal No. 1408/2017

23.01.2020


Due to general strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak, Additional AG for the respondents present. Adjourned to 11.03.2020 for rejoinder and arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

11.03.2020

Appellant in person present. Asst: AG alongwith Mr. Sajid, ADEO for respondents present. Appellant seeks adjournment. Adjourned. To come up for arguments on 11.05.2020 before D.B.


Member


Member

21.08.2019 Learned counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Mr. Sajid ADO for respondent No. 1, 2 & 4 present and submitted written reply. None present on behalf of respondent No.3, therefore, notice be issued to the respondent No.3 for attendance and submitted written reply/comments. Last opportunity is granted. Adjourned. To come up for written reply/comments on behalf of respondent No.3 on 19.09.2019 before S.B.



(Hussain Shah)
Member

19.09.2019 Appellant in person and Addl. AG alongwith Sajid Superintendent for respondents No. 1, 2 and 4 present. Nemo for respondent No. 3.

Representative of respondents No. 1, 2 and 4 has furnished parawise comments. Respondent No. 3 has not submitted requisite comments despite last opportunity. The appeal is posted to D.B for arguments on 28.11.2019. The appellant may submit rejoinder, within a fortnight, if so advised.

Chairman



28.11.2019 Due to general strike of the Pakistan Bar Council, the case is adjourned. To come up on 23.01.2020 before D.B.



Member



Member

19.03.2019

Counsel for the applicant present. The instant application is for restoration of service appeal No. 1408/2017 dismissed for not deposit security and process fee on 03.08.2018.

The application is duly supported by Affidavit and the reason given. Therefore in order justifiable as such the application is accepted and the appeal is restored to its original Number with a costs of Rs.500/.

The appellant is directed to deposit security and process fee within seven (07) days. Thereafter notice be issued to the respondents for submission of written reply/comments on 06.05.2019 before S.B.

Appellant Deposited
Security & Process Fee


Member

06.05.2019

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Written reply on behalf of respondents not submitted. Learned Additional AG requested for further adjournment. Adjourned to 26.06.2019 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

26.06.2019

Appellant in person present. Written reply not submitted. Sajid ADO (for respondent No.4) absent. Respondents as well as absent representative be put to notice for submission of written reply/comments. Adjourn. To come up for written reply/comments on 21.08.2019 before S.B.


Member

06.12.2018

Counsel for the petitioner and Addl. AG for the respondents present.

Learned counsel for the petitioner requests for time to further prepare the case on the point that the appeal was dismissed both ~~to~~ default of appearance as well as non-deposit of security/process fee.

Adjourned to 16.01.2019 before S.B.


Chairman

16.1.2019

Junior to counsel for the petitioner present.

It is stated that learned senior counsel for the petitioner has proceeded to perform Umra, therefore, the matter may be adjourned. Adjourned to ~~16~~ 02.2019 before S.B.


Chairman

14.02.2019




Due to general strike of the bar, the case is adjourned. To come up for further proceedings on 19.03.2019 before S.B.


Member

Form-A
FORM OF ORDER SHEET

Court of _____

Appeal's Restoration Application No. 341/2018

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	28.09.2018	<p>The application for restoration of appeal no. 1408/2017 submitted by Mr. Irfan Ali Yousafzai Advocate may be entered in the relevant register and put up to the Court for proper order please.</p>
2	<p>1-10-18</p> <p>22-10-18</p>	<p>This restoration application is entrusted to S. Bench to be put up there on <u>22/10/2018</u></p> <p style="text-align: right;">  REGISTRAR 22/9/18 </p> <p style="text-align: right;">  MEMBER </p> <p><i>Due to Retirement of Honorable Chairman the Tribunal is non functional therefore the case is adjourned to come up for the same on 6-12-2018</i></p> <p style="text-align: right;">  Reader </p>

Appeal No. 1408/2017
Khursheed vs Govt


03.08.2018

Neither the appellant nor his counsel present.

On one hand, on 26.02.2018, the appellant was directed to deposit security and process fee within 7 days but he did not comply with order of this Tribunal and on the other hand on 16.04.2018 and then on 02.07.2018 neither the appellant nor his counsel was present nor the security and process fees has been deposited so far. ^{From} ~~On~~ this conduct of the appellant, one thing is clear that he is not interested to pursue the appeal. Today the court time is about to over being Friday.

As such, in the circumstances, this Tribunal is left with no other option but to dismiss the appeal in default. File be consigned to the record room.

Announced:
03.08.2018


Chairman 3.8.2018

16.04.2018 None present of behalf of appellant and his counsel. Mr. Kabir Ullah Khattak, Addl: AG for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on ^{29/05} ~~07~~ 06.2018 before S.B. Notices be issued to the appellant and his counsel for attendance.


Member

09.05.2018 The Tribunal is non functional due to retirement of the Honorable Chairman. Therefore, the case is adjourned. To come up for the same on **02.07.2018** before S.B.


Reader

03.07.2018 None present on behalf of appellant. Mr. Muhammad Jan. DDA for the respondents present. Security and process fee not deposited. Appellant is directed to deposit security and process fee within (7) days, thereafter notices be issued to the respondents for written reply/comments on **03.08.2018** before S.B.


Member

Khurshid

08.01.2018

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as PST. It was further contended that during service his appointment order was withdrawn vide order dated 25.07.2016 with effect from the date of issuance of appointment order on the allegation that he has impersonate in the NTS test. It was further contended that neither charge sheet was framed nor statement of allegation was served nor proper inquiry was conducted nor any final show-cause notice was issued to the appellant and the appellant was not provided any opportunity of personal hearing and defence therefore, the impugned order is illegal and liable to be set-aside.

The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, thereafter notice be issued to the respondents for written reply/comments for 26.02.2018 before S.B.

MA
(Muhammad Amin Khan Kundi)
Member



26.02.2018

Appellant in person and Addl: AG for respondents present. Security and process fee not deposited. Appellant seeks time. He is directed to deposit security and process fee within 7 days, thereafter notices be issued to the respondents for submission of written reply/comments on 16.04.2018 before S.B.

AH
(Ahmad Hassan)
Member (E)

Form-A
FORM OF ORDERSHEET

Court of _____
Case No. 1408/2017


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26/12/2017	<p>The appeal of Mr. Khursheed resubmitted today by Mr. Irfan Ali Yousafzai Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 26/12/17</p>
2-	29/12/17.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/01/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Khursheed son of Noushad r/o village Takar Takht Bhai Mardan received today i.e. on 19.12.2017 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Memorandum of appeal may be got signed by the appellant.


No. 2724 /S.T,

Dt. 20/12 /2017


REGISTRAR 20/12/17
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Irfan Ali Yousafzai Adv. Pesh.

Re-Submitted with correction.

 Pali
Advocate
Peshawar

26-12-2017

03.02.2021

Counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Sajid, ADEO (Litigation) for the respondents are also present.

As a result of involvement of question of retrospectivity in the instant lis we are unable to hear arguments as the issue is pending adjudication in the Larger Bench of this Tribunal constituted for the purpose. Till a judgment is made, the instant appeal is adjourned to 29.03.2021 on which date file to come up for further proceedings before D.B.

(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

~~DISMISSED ON 6/11/17~~

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Services Appeal No. 1408 /2017

Khursheed .

VERSUS

Director Elementary & Secondary etc

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6.	Copy of Charge report	B	18
7.	Copy of impugned order	C	19
8.	Copy of NTS Slip and result	D, E	20-21
9.	Copy of departmental appeal dated 18/08/2016	F	22-25
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Dated: 15/12/2017

Through

APPELLANT

Irfaan Ali Yousafzai
IRFAN ALI YOUSAFZAI

Advocate,

High Court Peshawar

Irfaan Ali Yousafzai
Appellant Deposited
Security & Process Fee
15/12/17

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Services Appeal No. 1408 /2017

Khursheed S/o Noushad R/o Village Takar, Takht Bhai, Mardan.
... (APPELLANT)

VERSUS

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa.
2. Director Education Officer (Male), Mardan.
3. Director NTS, Peshawar.
4. Sub Divisional Education officer (Male), Takht Bhai, Mardan.

.. RESPONDENTS

APPEAL UNDER SECTION 4 OF THE SERVICES
TRIBUNAL ACT 1974, AGAINST THE IMPUGNED
ORDER DATED 25/07/2016 WHEREBY THE
APPOINTMENT ORDER OF THE APPELLANT WAS
WITHDRAWN

Prayer:

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED
DISMISSAL ORDER DATED 25/07/2017 OF RESPONDENTS BE
SET ASIDE AND THE APPELLANT BE ALLOWED TO
CONTINUE ON WITH HIS SERVICES WITH ALL BACK
BENEFITS

2

Respectfully Sheweth,

1. That the appellant was appointed by respondent no.2 as PST Teacher vide order No. 2145/G, dated 25/03/2016 at Sr No.419 after fulfillment of all the codal formalities. (Copy of appointment letter is attached as annexure A).
2. That in compliance of order of the respondent no.2 the appellant took his charge at Govt Primary School Pati Khurd, Takht Bhai, Mardan on 26/03/2016. (Copy of Charge report is attached as annexure B).
3. That the appellant performed his duties to the entire satisfaction of this superiors and there was not complaint whatsoever against the appellant.
4. That on dated 25/07/2016 vide Endst No. 5351/9, the respondent No. 2 withdrawn the appointment order of the appellant wherein it was stated that the appellant has impersonated in the NTS test. (Copy of order dated 25/07/2016 is attached as annexure C).
5. That properly upon the NTS Slip photo of the appellant was available and no question of forgery arises at all. (Copy of NTS Slip and result is attached as annexure D, E)
6. That the appellant filed department appeal against the impugned order, but the same till date has not been replied. (Copy of departmental appeal dated 18/08/2016 is annexure F)

7. That being aggrieved from the impugned orders mentioned above the appellant now approaches this Honourable Tribunal on the following grounds amongst the others:

Grounds:

- A. That the impugned order of withdrawal passed by respondent no.2 is against the law, facts, norms of natural justice and material on record, and being passed in utter violation of law and rules, hence liable to be set aside.
- B. That the appellant has not been treated by respondent's department in accordance with law and rules, while passing the impugned dismissal order.
- C. That no proper inquiry was conducted by respondent's department while passing the impugned order.
- D. That that no charge sheet, no statement of allegations, no final show cause notice were served upon the appellant by the respondents, which is clear violation of mandatory provisions of law, for awarding the major penalty.
- E. That the appellant was never associated with any inquiry proceedings, all the proceedings were conducted at the

(4)

back of the appellant, which is violation of article 10-A of the Constitution of Pakistan.

F. That the appellant has never been provided an opportunity of personal hearing.

G. That the respondent's department acted in arbitrary manner, while passing the impugned order.

H. That the mandatory provisions of law have not been fulfilled by respondents.

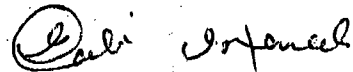
I. That any other ground would be raised at the time of arguments with the prior permission of this Honourable Tribunal.

Prayer:

It is, therefore, most humbly prayed that on acceptance of the instant appeal the impugned order of dated 25/07/2016 of respondent no.2 may kindly be set aside and the appellant be re-instated on service with all back benefits.

Appellant

Through



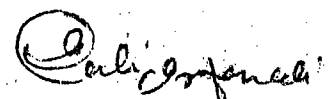
IRFAN ALI YOUSAFZAI

Advocate, High Court Peshawar

Certificate:

Certified that as per instruction of my client no such like appeal has earlier been filed.

Advocate



5

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Services Appeal No. _____/2017

Khursheed

VERSUS

Director Elementary & Secondary etc

APPLICATION FOR CONDONATION OF DELAY IF ANY

Respectfully Sheweth,

- 1. That the captioned appeal, with may be read part and parcel of this application, is pending before this learned forum in with I no date of hearing has been fixed.*
- 2. That the appellant time and again approached the Respondents to find about the status of his case but no information of any sort was given to the Appellant.*
- 3. That the appellant had filed his departmental representation which till date has not been replied and the appellant was waiting for its outcome.*
- 4. That as such, the appellant seeks its condonation on the aforementioned grounds.*

6

5. That this learned forum has always leaned in favour of adjudication on merits rather than technicalities.

6. That the appellant is a poor man and seeks kind indulgence of this learned forum.

It is therefore most humbly submitted that on acceptance of this application the delay in lodging the captioned appeal may most humbly be condoned in the interest of justice.

Dated: 15/12/2017

Through

APPELLANT



IRFAN ALI YOUSAFZAI

Advocate,

High Court Peshawar

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Services Appeal No. _____/2017

Khursheed

VERSUS

Director Elementary & Secondary etc

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT:

Khursheed S/o Noushad R/o Village Takar, Takht Bhai, Mardan.

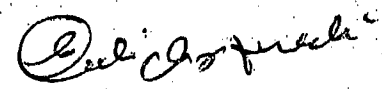
ADDRESSES OF RESPONDENTS: -

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa.
2. Director Education Officer (Male), Mardan.
3. Director NTS, Peshawar.
4. Sub Divisional Education officer (Male), Takht Bhai, Mardan.

Dated: 15/12/2017

Appellant

Through



IRFAN ALI YOUSAFZAI
Advocate,
High Court Peshawar

8

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. _____/2017

Khursheed

VERSUS

Director Elementary & Secondary etc

AFFIDAVIT

I, KHURSHEED S/O NOUSHAD R/O VILLAGE TAKAR, TAKHT BHAJ, MARDAN, do hereby solemnly affirm and declare on oath that the contents of the instant appeal are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.

DEPONENT

Identified by:

IRFAN ALI YOUSAFZAI,
Advocate, High Court Peshawar

(Signature)

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Annex-7



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
MARDAN

NOTIFICATION

Consequent upon the recommendations of the Departmental Selection Committee Distt Mardan in its meeting held on 22-03-2016, appointment of the following candidates is hereby ordered against the post of Primary School Teacher (PST) on school & U/C based in BPS-12 (Rs.9055-650-28555) plus usual allowances as admissible under the rules on adhoc basis for the period of one year under the existing policy of the Provincial Government, in the Teaching cadre on the terms and conditions given below with effect from their taking over charge in the schools as noted against each:-

S/No	Name	F/Name	School	U/C	Date of Birth	Total Score	Remarks
U/C Ato							
1	Sajjad Ali	Said Badshah	GPS Moli Balu	Ato	06-03-1983	125.07	A. V. Post
2	Muhammad Naeem	Azeem Khan	GPS Pirano Banda	Ato	07-03-1987	123.82	A. V. Post
3	Muhammad shoraz	Muhammad Rasool	GPS Pirano Banda	Ato	15-01-1993	118.55	A. V. Post
4	Imran Ali	Zerdullah Khan	GPS Pirano Banda	Ato	28-03-1993	116.12	A. V. Post
5	Aftab Ahmad Khan	Sher Zaman	GPS No.1 Ato	Ato	27-10-1991	114.83	A. V. Post
6	Imtiaz Ali	Behroz Khan	GPS Pipal	Ato	10-03-1994	103.11	A. V. Post
U/C Babeni							
7	Malik Aman	Muhammad Afzal	GPS Sajid Akbar Killi	Babeni	08-04-1991	140.41	A. V. Post
8	Akhtar Munoor	Nawab Zada	GPS Shankar Mardan	Babeni	10-04-1984	120.23	A. V. Post
9	Shahid Ayaz	Farid Gul	GPS Shankar Koroona	Babeni	10-04-1985	118.46	A. V. Post
10	Muhammad Tariq	Fazli Rabi	GPS No.2 Shahgai	Babeni	01-03-1990	114.53	A. V. Post
11	Fazli Mulla	Abdul Hamood	GPS No.1 Shahgai	Babeni	15-03-1992	112.34	A. V. Post
12	Ijaz Ahmad	Badullah Khan	GPS Shankar Koroona	Babeni	10-10-1992	112.26	A. V. Post
13	Abdul Hamood	Misbah Ud Duja	GPS Naseer Killi	Babeni	20-04-1983	111.18	A. V. Post
14	Murad Ali	Sarfraz Khan	GPS Khudai Noor Killi	Babeni	15-03-1987	110.81	A. V. Post
15	Sheraz	Nawab Zada	GPS Mir Akbar Killi	Babeni	01-04-1990	109.40	A. V. Post
16	Fazal Raziq	Abdul Majid	GPS Kudinka	Babeni	01-03-1980	106.71	A. V. Post
17	Shehzad Khan	Ramal Gul	GPS Shagai No1	Babeni	30-09-1986	105.37	A. V. Post
U/C Babuzai							
18	Aziz Dad Shah	Hukam Dad Shah	GPS Miangan Babuzai	Babuzai	11-04-1987	119.99	A. V. Post
U/C Baghdada							
19	Mazhar Shah	Muqadar Shah	GPS No.1 Baghdada	Baghdada	15-08-1992	132.52	A. V. Post
20	Yasir Ali Khan	Ashraf Ud Din	GPS Faqir Band	Baghdada	28-05-1993	120.15	A. V. Post
U/C Bagh-e-Iram							
21	Sajid Khan	Khalid Khan	GPS Tambulak	Baghi Iram	24-04-1988	96.68	A. V. Post
U/C Baghicha Dheri							
22	Waris Khan	Rahmat Shah	GPS No.1 Baghicha Dheri	Baghicha Dheri	02-01-1992	123.81	A. V. Post
23	Fazal Hanan	Fazal Amin	GPS No.2 Baghicha Dheri	Baghicha Dheri	18-06-1994	117.86	A. V. Post
24	Wasim Ihsan	Ihsan Ullah	GPS No.1 Baghicha Dheri	Baghicha Dheri	26-03-1991	115.64	A. V. Post
25	Sabir Ur Rahman	Shamsur Rahman	GPS Gulshan Abad	Baghicha Dheri	15-04-1991	100.53	A. V. Post
26	Mian Mufeed Ud Din	Mian Sabuqtain	GPS No.1 Baghicha Dheri	Baghicha Dheri	20-03-1992	92.47	A. V. Post
27	Farhan Ahmad	Sardar Ahmad	GPS No.1 Baghicha Dheri	Baghicha Dheri	15-02-1999	89.26	A. V. Post
28	Ihsan Taj	Zahir Taj	GPS No.1 But Sari	Baghicha Dheri	01-02-1987	84.45	A. V. Post
U/C Bakhshali							
29	Asad Ali	Ghulam Qadir	GPS Bakhshali	Bakhshali	12-11-1989	134.05	A. V. Post
30	Khalid Usman	Qari Dildar Ud Din	GPS Bakhshali	Bakhshali	10-04-1988	124.95	A. V. Post
31	Fawad Ali	Khan Sher	GPS Jafar Abad	Bakhshali	05-03-1990	122.40	A. V. Post
32	Ameer Ud Din	Haji Zordin	GPS Shahzada Koroona	Bakhshali	15-03-1997	120.19	A. V. Post
33	Muhammad Asif	Azam Khan	GPS Jafar Abad	Bakhshali	10-01-1997	114.66	A. V. Post
34	Suroor Ahmad	Haji Muhammad Yaqoob	GPS Bakhshali	Bakhshali	01-01-1989	114.41	A. V. Post
U/C Bala Garhi							
35	Dauran Khan	Sher Aman	GPS Gulshan Abad Chaim Dheri	Balla Ghari	06-04-1991	133.48	A. V. Post
36	Kaloon Ullah Jan	Aman Ullah	GPS Chaim Dheri	Balla Ghari	14-10-1995	116.18	A. V. Post
37	Muhammad Salman Khan	Muhammad Shafiq	GPS Khani Koli	Balla Ghari	26-05-1992	111.23	A. V. Post
U/C Bazar							
38	Shahid Ali	Gul Shor	GPS Shahardan	Bazar	20-02-1993	113.17	A. V. Post

No	Name	F/Name	School	U/C	Date of Birth	Total Score	Remarks
39	Riaz Ali	Qalandar Khan	GPS Kula Dheri	Bazar	14-08-1983	109.93	A.V.Post
40	Ghulran Ali	Shadar Ali	GPS Kula Dheri	Bazar	19-03-1987	105.58	A.V.Post
41	Said Zaman	Izat.Noor	GPS Badar	Bazar	20-11-1986	105.57	A.V.Post
42	Tahir Zaman	Qamar U Zaman	GPS Petao Mandri	Bazar	14-01-1987	104.51	A.V.Post
43	Saeed Ur Rahman	Zia Ud Din	GPS Baringan	Bazar	12-03-1985	102.65	A.V.Post
44	Wajid Zada	Khan Zada	GPS Aman Kol	Bazar	01-02-1984	102.37	A.V.Post
U/C Bijli Ghar							
45	Muhammad Waqar	Nisar Muhammad	GPS Polico Linn	Bijli Ghar	05-02-1983	113.15	A.V.Post
46	Muhammad Ali	Sherin	GPS Polico Line	Bijli Ghar	04-05-1991	112.98	A.V.Post
U/C Chamtar							
47	Hazrat Dilal	Hazrat Umar	GPS Chamtar	Chamtar	01-01-1992	137.13	A.V.Post
48	Babar Ahmad	Mukamil Khan	GPS Malik Abad	Chamtar	01-01-1991	113.48	A.V.Post
49	Mudassir Khan	Abdul Malik	GPS Mian Gul Killi	Chamtar	10-03-1991	112.24	A.V.Post
50	Noor Rahman	Mian Lal Khan	GPS Narai Mian Gulzara	Chamtar	01-03-1982	105.51	A.V.Post
51	Gul Zada	Zarawar Khan	GPS Narai Mian Gulzara	Chamtar	13-04-1990	99.52	A.V.Post
52	Fazli Amin	Rahman Ud Din	GPS Narai Mian Gulzara	Chamtar	02-02-1986	99.32	A.V.Post
53	Irfan Ullah	Sharifullah	GPS Sharif Abad	Chamtar	12-08-1982	95.00	A.V.Post
54	Wasif	Muhabat Khan	GPS Nari Miagulzara	Chamtar	17-01-1993	93.34	A.V.Post
U/C Chargulli							
55	Ilyas Ahmad	Nazeer Ahmad	GPS Char Guli	Char Guli	29-09-1998	122.50	A.V.Post
56	Rashid Khan	Javed Khan	GPS Char Guli	Char Guli	03-04-1990	121.22	A.V.Post
57	Sadat Ali	Tahir Ali	GPS Surkh Dheri No.1	Char Guli	06-03-1994	116.53	A.V.Post
58	Kifayat Ullah	Gul Farosh	GPS Surkh Dheri No.1	Char Guli	20-11-1988	110.21	A.V.Post
59	Tahir Malik	Muhammad Malik	GPS Char Guli	Char Guli	03-04-1984	108.99	A.V.Post
60	Numan	Mali Ul Jalil	GPS Janal	Char Guli	21-10-1992	108.01	A.V.Post
61	Saifullah	Mali Ul Jalil	GPS Pishkand	Char Guli	20-03-1986	100.02	A.V.Post
62	Sayad Ul Islam	Derani	GPS Pishkand	Char Guli	10-01-1980	105.23	A.V.Post
U/C Chick Hoti							
63	Lal Muhammad	Iltbar Muhammad	GPS Bandal	Chick Hoti	10-04-1990	122.48	A.V.Post
64	Bashir Khan	Sardar Hussain	GPS Taus Banda	Chick Hoti	04-01-1987	103.51	A.V.Post
65	Arshid Khan	Rahim Shah	GPS Taus Banda	Chick Hoti	02-02-1989	101.85	A.V.Post
66	Akbar Zoh	Johanzob	GEPS Nawar Killi	Chick Hoti	01-03-1988	100.77	A.V.Post
67	Sakhi Arsala Khan	Ilyas Khan	GPS Bandal	Chick Hoti	12-04-1975	100.77	A.V.Post
68	Muhammad Uzair	Muhammad Ibrahim	GEPS Nawar Killi	Chick Hoti	01-01-1992	100.47	A.V.Post
69	Bakhtiar Khan	Nadar Khan	GPS Ijara Killi	Chick Hoti	01-02-1984	94.72	A.V.Post
70	Muhammad Arshid	Fazli Mabood	GPS Ijara Killi	Chick Hoti	31-03-1979	93.69	A.V.Post
71	Fazli Qadir	Ali Bahadar	GEPS Nawar Killi	Chick Hoti	08-04-1990	93.38	A.V.Post
72	Alamzeb	Johanzob	GPS Pani Alla Dad Khel	Chick Hoti	02-01-1979	91.87	A.V.Post
73	Noor Wahid	Hijab Gul	GPS Ijara Killi	Chick Hoti	22-12-1985	91.68	A.V.Post
74	Zain Ul Abidoon	Saroon Jan	GPS Bako Muhammad Khel	Chick Hoti	07-02-1994	90.10	A.V.Post
75	Amir Ullah	Musa Kaleemi	GPS Bako Muhammad Khel	Chick Hoti	25-03-1984	86.21	A.V.Post
76	Shoaib	Noor Gul	GPS Taus Banda	Chick Hoti	09-04-1988	86.07	A.V.Post
77	Shakeel Khan	Bacha Gul	GPS Bako Muhammad Khel	Chick Hoti	02-02-1991	84.47	A.V.Post
U/C Dagai							
78	Muhammad Usman	Gul Zareen	GPS Forum Koroon	Dagai	05-04-1989	110.73	A.V.Post
79	Muhammad Sulman	Murad Ali	GPS Dagai	Dagai	13-03-1992	109.33	A.V.Post
80	Muhammad Ismail	Sher Muhammad Khan	GPS Khan Mian Killi	Dagai	02-02-1993	108.05	A.V.Post
81	Zafar Ali	Zardullah Khan	GPS Kochi Abad	Dagai	16-03-1986	104.51	A.V.Post
U/C Daman-e-Koh							
82	Shaukat Ali	Noor Muhammad	GPS No.3 Takht Bhai	Damani Koh	10-03-1985	113.44	A.V.Post
83	Sajid Ullah	Abdur Rahman	GPS Mazdoor Abad	Damani Koh	02-03-1989	112.63	A.V.Post
84	Said Shah	Akbar Shah	GPS Mazdoor Abad	Damani Koh	15-02-1988	110.10	A.V.Post
85	Fazli Raziq	Abdul Qadir	GPS Ward No.1	Damani Koh	05-03-1986	109.02	A.V.Post
U/C Dheri Likpani							
86	Hussain Ahmad	Abdul Wajid	GPS No.1 Dheri	Dheri Likpani	10-04-1992	127.77	A.V.Post
87	Shahir Ahmad	Abdul Wajid	GPS No.1 Dheri	Dheri Likpani	15-04-1988	126.20	A.V.Post
88	Tariq Muhammad	Said Muhammad	GPS Dheri No.1	Dheri Likpani	22-02-1987	122.41	A.V.Post
89	Muhammad Rashid	Muhammad Darvish	GPS No.3 Dheri	Dheri Likpani	10-04-1984	116.04	A.V.Post
90	Ibrahim Khan	Lal Dad Shah	GPS Kotki	Dheri Likpani	01-01-1988	114.83	A.V.Post
91	Muhammad Saeed	Muhammad Darvish	GPS No.1 Dheri	Dheri Likpani	08-02-1991	114.24	A.V.Post
92	Muhammad Ilyas	Muhammad Noor	GPS Likpani	Dheri Likpani	10-01-1985	113.87	A.V.Post
93	Abdur Hussain	Abdul Ghafoor	GPS Moll Payan	Dheri Likpani	12-03-1987	112.84	A.V.Post
94	Parviz Khan	Gul Akbar Khan	GPS Likpani	Dheri Likpani	05-01-1986	112.41	A.V.Post
95	Arshid Ali	Amir Qasim	GPS Likpani	Dheri Likpani	04-02-1986	112.10	A.V.Post
96	Ahmad Said	Muhammad Said	GPS Ilyas Khan	Dheri Likpani	20-04-1991	97.46	A.V.Post

Name	F/Name	School	U/C	Date of Birth	Total Score	Remarks
97 Tufail Akbar	Said Muhammad Akbar	GPS Seri Bacha Khel	Dheri Likpani	10-03-1988	95.82	A.V.Post
98 Khalid Khan	Zar Dad Khan	GPS Chaanoona	Dheri Likpani	03-03-1980	95.27	A.V.Post
99 Fazal Rouf	Fazal Malik	GPS No.1 Gharib Abad	Dheri Likpani	15-01-1986	95.21	A.V.Post
U/C Fatma						
100 Junaid Ali	Mukhtiar Ali	GPS Palosai Gaddar	Falma	03-05-1993	131.99	A.V.Post
101 Ijaz Ali	Nisar Muhammad	GPS Essn Khan	Falma	01-03-1989	130.77	A.V.Post
102 Wasif Khan	Shakir Ullah	GPS New Falma	Falma	02-09-1987	122.08	A.V.Post
103 Abass Ali	Sarder Ali	GPS Falma	Falma	12-01-1992	115.61	A.V.Post
104 Muhammad Abid	Abdul Shakoor	GPS Mona Banda	Falma	08-03-1986	113.91	A.V.Post
105 Latif Ur Rahman	Mahboob Mustajban	GPS Now Falma	Falma	01-01-1986	111.07	A.V.Post
106 Muhammad Sikandar Nawaz	Bacha-e-Room	GPS No.2 Gaddar	Falma	17-01-1988	111.02	A.V.Post
107 Muhammad Arim	Said Ghaffoor	GPS Nahn Abud	Falma	05-03-1994	108.62	A.V.Post
108 Noor Khan	Fazal Ghulfoor	GPS Falma	Falma	04-04-1991	106.44	A.V.Post
109 Farhad Ali	Fazal Dad	GPS Chagharzai	Falma	01-02-1985	105.27	A.V.Post
110 Illaf Hussain	Fazal Mabood	GPS Falma	Falma	03-03-1988	104.09	A.V.Post
U/C Garyala						
111 Salman Faisal	Iqbal Hussain	GPS Bhai Khan	Garyala	15-03-1994	122.68	A.V.Post
112 Naveed Ahmad	Fazal Ghani	GPS No.2 Garyala	Garyala	16-11-1984	119.43	A.V.Post
113 Kifayat Ullah	Lutf Ur Rahman	GPS No.2 Garyala	Garyala	05-03-1981	106.68	A.V.Post
114 Muhammad Mumtaz	Gul Rahman	GPS Husai	Garyala	10-04-1990	106.39	A.V.Post
115 Izazul Hassan	Zafar Ali	GPS Bhai Khan	Garyala	01-05-1994	105.50	A.V.Post
116 Shabir Ahmad	Muhammad Tariq	GPS Bhai Khan	Garyala	10-04-1994	105.05	A.V.Post
117 Hussan-Zeb	Jehanzeb	GPS Miangan Garyala	Garyala	08-09-1992	103.19	A.V.Post
118 Bostan Ullah	Wajid Ali	GPS Husai	Garyala	12-04-1990	102.57	A.V.Post
119 Adnan Khan	Jamnd Khan	GPS No.2 Garyala	Garyala	04-04-1993	101.67	A.V.Post
U/C Ghalla Dher						
120 Wakoal Khan	Gul Rohim	GPS No.1 Ghalla Dhor	Ghalla Dhor	15-03-1992	107.05	A.V.Post
121 Kashif	Gul Zada	GPS No.1 Ghalla Dhor	Ghalla Dhor	31-03-1985	106.75	A.V.Post
122 Muhammad Bilal	Murad Khan	GPS No.1 Ghalla Dhor	Ghalla Dhor	20-03-1992	100.60	A.V.Post
123 Haroon Johar	Johar Ali	GPS Sokal	Ghalla Dhor	20-04-1991	98.65	A.V.Post
124 Adnan Ahmad	Ghulam Sadiq	GPS No.1 Saeed Abad	Ghalla Dhor	15-04-1991	95.79	A.V.Post
125 Rizaz Ud Din	Lajbar Khan	GPS Sokal	Ghalla Dhor	01-02-1991	95.32	A.V.Post
126 Muhammad Ibrar	Said Afzal	GPS Talab Killi	Ghalla Dhor	27-12-1985	93.72	A.V.Post
127 Muhammad Arif	Gul Zaman	GPS Talab Killi	Ghalla Dhor	03-03-1985	93.34	A.V.Post
128 Rahat Shah	Faqir Khan	GPS Bago Banda	Ghalla Dhor	23-12-1985	93.22	A.V.Post
129 Khushdil Khan	Zaman Khan	GPS No.2 Saeed Abad	Ghalla Dhor	12-03-1986	92.01	A.V.Post
130 Muhammad Salih	Munir Khan	GPS No.2 Saeed Abad	Ghalla Dhor	02-01-1989	91.67	A.V.Post
131 Arshid Ali	Gul Roz Khan	GPS Talab Killi	Ghalla Dhor	02-01-1992	90.27	A.V.Post
132 Farhad Ali	Laiqat Ali	GPS No.2 Saeed Abad	Ghalla Dhor	03-04-1990	90.05	A.V.Post
U/C Gujar Garhi						
133 Yousaf Ali Shah	Noor Ahmad Shah	GPS Minn Gano Cham	Gujar Ghari	06-02-1980	119.85	A.V.Post
134 Sajjad Khan	Ayub Khan	GPS Mian Gano Cham	Gujar Ghari	15-04-1981	114.79	A.V.Post
135 Shamzul Abidnan	Israr Ud Din	GPS Deputy Killi	Gujar Ghari	15-03-1989	113.64	A.V.Post
136 Wajid Khan	Shar Muhammad Khan	GPS Deputy Killi	Gujar Ghari	31-03-1984	112.13	A.V.Post
137 Sheraz Ali Shah	Pir Raj Wali Shah	GPS Ghnz Killi	Gujar Ghari	15-04-1985	111.06	A.V.Post
138 Hazrat Ali	Gul-Rahman	GPS Ghnz Killi	Gujar Ghari	05-01-1989	111.21	A.V.Post
U/C Gujrat						
139 Umar Nasir	Gul Bahadur	GPS Soda Bahar	Gujarat	12-04-1990	126.18	A.V.Post
140 Illukhar Ali	Amir Nawas	GPS Chiragah	Gujarat	05-02-1983	106.81	A.V.Post
U/C Guli Bagh						
141 Ijaz Ul Haq	Noor Zada	GPS Lumbaki	Guli Bagh	30-01-1992	112.24	A.V.Post
142 Ghoshul Anam	Haji Fazal Dad	GPS Lumbaki	Guli Bagh	13-05-1987	108.86	A.V.Post
143 Muhammad Zubair	Sabbir Zaria	GPS Guli Bagh	Guli Bagh	01-04-1983	108.63	A.V.Post
U/C Gumbal						
144 Asad Ali	Karim Khan	GPS Shahzad Abad	Gumbal	11-01-1990	117.02	A.V.Post
145 Inzamm Ul Haq	Qazi Huzar Ul Haq	GPS Mahmood Abad	Gumbal	21-03-1993	116.06	A.V.Post
U/C Hatian						
146 Nodnam	Khalig Dad	GPS Libas Khan	Hatian	03-03-1991	129.57	A.V.Post
147 Imtiaz Khan	Muhammad Afzal	GPS Hatian	Hatian	09-09-1982	122.52	A.V.Post
148 Muhammad Tahir	Muhammad Sabir	GPS Akbar-Abad	Hatian	20-03-1989	119.57	A.V.Post
149 Jawad Ali	Jehangir Khan	GPS Tanq Abad	Hatian	10-03-1990	117.64	A.V.Post
U/C Hoti						
150 Raid Ali	Muhammad Ali	GPS Purana Hoti	Hoti	16-03-1990	121.21	A.V.Post
151 Amin Ullah	Miraj Gul	GPS Biland Khel	Hoti	10-05-1988	112.02	A.V.Post
U/C Ikram Pur						
152 Muhammad Ilyas	Muhammad Nawab	GPS Swalo	Ikram Pur	01-04-1982	121.06	A.V.Post
153 Abdullah	Jandullah Khan	GPS Ridwan	Ikram Pur	25-02-1992	120.54	A.V.Post

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	Name	F/Name	School	U/C	Date of Birth	Total Score	Remarks
271	Hanif Shah	Zyarat Shah	GPS Gado Mayar	Mayar	02-03-1986	120.97	A.V.Post
272	Aziz Ur Rahman	Ghani Ur Rahman	GPS Balai Koroona	Mayar	15-03-1987	119.00	A.V.Post
273	Syed Mustafa	Noor Ul Hadi	GPS No.1 Mayar	Mayar	04-04-1992	111.67	A.V.Post
274	Muhammad Shahabu Din	Muhammad Saleem Khan	GPS No.1 Mayar	Mayar	10-04-1988	110.04	A.V.Post
U/C Mian Essa							
275	Muhammad Saleem	Umar Shah	GPS Musafar Khan Killi	Mian Essa	15-04-1980	129.05	A.V.Post
276	Ayaz Khan	Sultan Jan	GPS Malo Shah	Mian Essa	04-02-1985	122.36	A.V.Post
277	Abid Ali	Sifal Khan	GPS No.1 Mian Gan	Mian Essa	10-04-1984	121.94	A.V.Post
278	Shamsul Haq	Ihsan Ul Haq	GPS Kalu Shah	Mian Essa	15-03-1986	117.25	A.V.Post
279	Jehad Ali	Fazal Ghani	GPS Malo Shah	Mian Essa	11-01-1986	116.02	A.V.Post
280	Zawar Hussain	Sifal Khan	GPS No.1 Mian Gan	Mian Essa	08-04-1982	110.79	A.V.Post
281	Abdul Wakeel	Rosi Khan	GPS Malo Shah	Mian Essa	25-03-1992	109.68	A.V.Post
U/C Mohib Banda							
282	Syed Muhammad Zia Ullah	Syedd Ibrahim	GPS No.1 Mohib Banda	Mohib Banda	13-03-1992	130.68	A.V.Post
283	Illaf Hussain	Muhammad Qasim	GPS No.2 Mohib Banda	Mohib Banda	10-04-1985	115.87	A.V.Post
284	Sadal Ali	Misal Khan	GPS Shor Abad	Mohib Banda	03-05-1994	112.37	A.V.Post
285	Muhammad Asad	Abdul Jalil	GPS Choor	Mohib Banda	15-05-1987	111.72	A.V.Post
286	Naseer Ahmad	Fazal Rahim	GPS No.3 Mohib Banda	Mohib Banda	07-03-1981	107.75	A.V.Post
287	Muhammad Wahood	Farman Ali	GPS No.1 Mohib Banda	Mohib Banda	11-01-1994	103.66	A.V.Post
288	Abdullah	Muhammad Jan	GPS Choor	Mohib Banda	06-01-1991	103.09	A.V.Post
289	Naveed Ur Rehman	Ghani Ur Rahman	GPS Kagan	Mohib Banda	03-03-1992	102.01	A.V.Post
290	Riaz Ur Rahman	Faizur Rahman	GPS No.1 Zando	Mohib Banda	16-03-1983	101.95	A.V.Post
291	Fazal Malik	Masood Khan	GPS No.2 Zando	Mohib Banda	04-04-1989	100.01	A.V.Post
U/C Muhabat Abad							
292	Shoaib Ahmad	Ali Haider	GPS Akbar Abad	Muhabat Abad	20-04-1990	110.07	A.V.Post
293	Zewar Khan	Kashmir Khan	GPS Ittehad Colony	Muhabat Abad	10-04-1981	106.14	A.V.Post
294	Sadiq Shah Afridi	Sher Akbar	GPS Seri Koragh	Muhabat Abad	25-03-1986	104.05	A.V.Post
295	Ihsan Ullah	Akram	GPS Akbar Khan Kotli	Muhabat Abad	01-01-1989	102.81	A.V.Post
296	Muhammad Younas	Muhammad Siraj	GPS Koragh No.1	Muhabat Abad	24-06-1988	101.75	A.V.Post
297	Araf Khan	Muhammad Ayub Khan	GPS Ittehad Colony	Muhabat Abad	16-04-1989	100.31	A.V.Post
298	Khalid Khan	Shafiullah	GPS Koragh no.1	Muhabat Abad	06-03-1986	96.38	A.V.Post
299	Anwar Khan	Mir Akbar Khan	GPS Gujrano Killi	Muhabat Abad	10-03-1983	95.13	A.V.Post
300	Noor Zaman	Suliman	GPS Surkh Dheri	Muhabat Abad	15-03-1987	94.65	A.V.Post
301	Naveed Akhtar	Habib Ur Rahman	GPS Koragh No.1	Muhabat Abad	05-11-1985	91.91	A.V.Post
U/C Muslim Abad							
302	Irfan Ullah Jan	Rahim Ullah Jan	GPS Karwan Road	Muslim Abad	01-05-1980	131.58	A.V.Post
303	Bilal Qayum	Said Qayum	GPS No.2 Civil Colony	Muslim Abad	22-10-1984	112.86	A.V.Post
304	Muhammad Amir	Fazul Hakim	GPS No.2 Civil Colony	Muslim Abad	02-01-1980	112.06	A.V.Post
305	Muhammad Umair Khan	Muhammad Anwar	GPS Muslim Abad	Muslim Abad	01-04-1983	110.03	A.V.Post
U/C Narai							
306	Syed Kifayat Shah	Syed Muhammad Shah	GPS Mamando Garho Shah	Narai	05-03-1990	142.24	A.V.Post
307	Wajid Ali	Saifullah	GPS Garo Shah	Narai	10-12-1988	127.08	A.V.Post
308	Khurshid	Jamshid	GPS Kalo Shah	Narai	20-03-1989	127.07	A.V.Post
U/C Palo Dheri							
309	Ajab Khan	Anwar Khan	GPS Chena	Palo Dheri	03-02-1987	128.06	A.V.Post
310	Haris Burhan	Syed Burhan Ud Din	GPS Shaifoori	Palo Dheri	18-05-1991	123.85	A.V.Post
U/C Par Hoti							
311	Muhammad Tahir	Abdur Rahman	GPS Par Hoti	Par Hoti	12-05-1988	132.87	A.V.Post
312	Muhammad Asif	Jaiifoor Khan	GPS Shah Dand	Par Hoti	05-02-1988	124.59	A.V.Post
313	Shabir Ahmad	Said Shah	GPS Azoom Abad	Par Hoti	15-04-1987	121.07	A.V.Post
314	Muhammad Aqib	Sahib Zada	GPS Nawab Khan	Par Hoti	18-05-1992	106.12	A.V.Post
U/C Parkho							
315	Hammad Ullah	Jamdali	GPS Karim killi	Parkho	13-03-1992	132.85	A.V.Post
316	Farooq Khan	Adam Khan	GPS Raidul killi	Parkho	15-03-1982	118.70	A.V.Post
317	Nasrullah Minallah	Muhammad Khan	GPS Mazdoor Abad(GP)	Parkho	15-03-1988	117.13	A.V.Post
318	Latif ullah	Zainulah Khan	GPS Shah Bat Khol	Parkho	25-03-1992	115.82	A.V.Post
319	Said Akbar	Ali Akbar	GPS Faras Killi	Parkho	25-03-1987	115.18	A.V.Post
320	Inayat Ur Rohman	Bakht Zada	GPS Ghano Dheri	Parkho	30-03-1991	114.77	A.V.Post
321	Samiullah	Sabz Ali Khan	GPS Karim killi	Parkho	04-03-1993	113.94	A.V.Post
322	Muhamna Iqbal	Awal Suz	GPS Jalil Abud	Parkho	24-03-1984	112.57	A.V.Post
323	Bilal	Amir Muhammad	GPS Chanchano Khal	Parkho	13-02-1993	110.40	A.V.Post
324	Nadeem Asghar	Ali Asghar	GPS Chanchano Khal	Parkho	14-01-1991	109.04	A.V.Post
325	Ubaid Khan	Taj Muhammad	GPS Pisha	Parkho	18-02-1990	107.78	A.V.Post
U/C Pat Baba							
			GPS No.1 Takht Illal	Pat Baba	13-02-1991	116.77	A.V.Post
				Pat Baba	13-10-1982	127.40	A.V.Post

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Name	F/Name	School	U/C	Date of Birth	Total Score	Remarks
Mahboob Ul Haq	Gul Badshah	GPS No.2 Takht Bhai	Pat Baba	23-03-1992	125.02	A.V.Post
Shnr Nnbi	Muhammad Nabi	GPS Sazo Din	Pat Baba	22-02-1988	124.11	A.V.Post
Muhammad Fnyaz	Abdul Shakoor	GPS Sazo Din	Pat Baba	17-01-1984	119.56	A.V.Post
U/C Pir Saddi						
331	Shakir ullah	Inayat Khan	GPS No2 Pir Sadi	Pirsadi	24-03-1984	124.16 A.V.Post
332	Amjid Akhtar	Alam Sahah	GPS Sharif Malik Kili	Pirsadi	28-03-1991	123.72 A.V.Post
333	Miraj Ul Haq	Sahah Nazar Khan	GPS Gul Mir Kili	Pirsadi	25-07-1986	120.96 A.V.Post
334	Sojad Ahmad	Shor Muhammad	GPS Gul Ahmed Killi	Pirsadi	03-12-1982	120.62 A.V.Post
335	Saeed Muhammad	Pir Muhammad	GPS Mishkar Seri	Pirsadi	11-04-1988	119.12 A.V.Post
336	Mushtaq ahmed	Shor Bahadar	GPS Laif Abad	Pirsadi	03-02-1993	118.81 A.V.Post
337	Iffikhar Ali	Shouka All	GPS No1 Pir Sadi	Pirsadi	02-02-1987	117.02 A.V.Post
338	Zakir ullah	Alam Zob	GPS Qadur Shah	Pirsadi	01-04-1988	116.47 A.V.Post
339	Gohar shah	Niamat Khan	GPS No1 Pir Sadi	Pirsadi	05-03-1988	115.72 A.V.Post
340	Sartam Hussain	Sartaj Khan	GPS Laif abad	Pirsadi	09-02-1991	114.69 A.V.Post
U/C Qasmi						
341	Abdur Rahman	Abdul Hakim	GPS Durr Babin	Qasmi	01-01-1985	111.71 A.V.Post
342	Hazrat Bilal	Tajbur Khan	GPS Durr Baba	Qasmi	10-08-1991	115.46 A.V.Post
343	Muhammad Tahir Ali Khan	Khan Dali	GPS Alam Ganj	Qasmi	06-10-1987	113.40 A.V.Post
344	Ibrar Hussain	Arshullah Khan	GPS Ghazi Banda	Qasmi	15-04-1984	104.70 A.V.Post
U/C Rorya						
345	Hazrat Bilal	Said Badshah	GPS Labour Colony	Rorya	01-04-1988	98.55 A.V.Post
346	Irfan Ali Khan	Zarshad Khan	GPS No.2 Mistri Abad	Rorya	15-01-1982	91.01 A.V.Post
347	Abdul Baseer	Bacha Gul	GPS No.2 Mistri Abad	Rorya	01-01-1981	90.91 A.V.Post
348	Jawad Anwar	Khan Muhammad	GPS Zaman Abad	Rorya	15-04-1984	90.21 A.V.Post
349	Lai Zada	Gul Zada	GPS Khura Banda	Rorya	27-04-1989	81.67 A.V.Post
350	Inayat Ur Rehman	Muhammad Habib	GPS Labour Colony	Rorya	14-02-1982	79.94 A.V.Post
351	Moqadar Shah	Zaiban Shah	GPS No.2 Mistri Abad	Rorya	01-12-1984	71.05 A.V.Post
352	Aurangzob	Amir Zada	GPS Zaman Abad	Rorya	15-02-1982	68.56 A.V.Post
U/C Rustam						
353	Sajid Ali	Zafir Gul	GPS Qamargai	Rustam	09-03-1985	132.71 A.V.Post
354	Sayyad Ali	Haider Khan	GPS Nodah Rustam	Rustam	14-03-1989	131.09 A.V.Post
355	Muhammad Naoum Khan	Hakim Khan	GPS Tushqand	Rustam	08-05-1983	126.22 A.V.Post
356	Muhammad Iqbal	SherUllah Khan	GPS Qamar Abad	Rustam	01-04-1980	119.75 A.V.Post
357	Muhammad Islam	Ahmad Khan	GPS Qalam Jan Banda	Rustam	01-10-1980	119.29 A.V.Post
358	Muhammad Adil	Momin Khan	GPS Haji Abad	Rustam	15-02-1988	116.52 A.V.Post
359	Falak Shor	Khan Shor	GPS Qamargai	Rustam	01-06-1983	114.97 A.V.Post
U/C Saro Shah						
360	Usman ali	Shor Zamin	GPS Baido Killi	Saro Shah	11-02-1982	121.28 A.V.Post
361	Sulaiman Shah	Fazal Shah	GPS Hashnagora Killi	Saro Shah	10-02-1989	119.18 A.V.Post
362	Noor Zad Gul	Azam Khan	GPS Hashnagora Killi	Saro Shah	01-03-1984	119.15 A.V.Post
363	Ihsan Ullah	Shor Zaman	GPS Sullan Abad Saro Shah	Saro Shah	08-02-1993	118.83 A.V.Post
364	Tahir Shah	Said Rasool	GPS Aslam Abad	Saro Shah	10-01-1991	115.80 A.V.Post
365	Muhammad Faheem	Sher Zada	GMPS Ali Haider Koti	Saro Shah	10-06-1989	113.83 A.V.Post
366	Muhammad Usman	Ibrahim	GPS Ghazi Gul Killi	Saro Shah	20-03-1992	112.94 A.V.Post
U/C Sawal Dher						
367	Syed Muhammad Shujaur Rahman	Ihsan Ur Rahman	GPS No.1 Sawal Dher	Sawal Dher	01-05-1986	133.88 A.V.Post
368	Jawad Ali Shah	Munfariq Shah	GPS No.1 Sawal Dher	Sawal Dher	20-03-1986	130.76 A.V.Post
369	Nazim Shah	Syed Johar Shah	GPS No.2 Sawal Dher	Sawal Dher	02-10-1988	126.39 A.V.Post
370	Ijaz Ahmed	Amir Bahadar	GPS Musn Khal	Sawal Dher	04-04-1989	110.30 A.V.Post
371	Syed Usman Ali Shah	Said Gul Badshah	GPS Sreekh Sawal Dher	Sawal Dher	04-04-1990	109.94 A.V.Post
372	Adil Shah	Qaiser Shah	GPS Umar Abad	Sawal Dher	03-04-1983	106.90 A.V.Post
373	Zakeullah	Syed Gul Badshah	GPS No.1 Guli Bagh Sawal Dher	Sawal Dher	03-04-1982	104.92 A.V.Post
374	Arshid Khan	Nimat Khan	GPS No.1 Sawal Dher	Sawal Dher	12-10-1987	101.13 A.V.Post
U/C Seri Behlol						
375	Farhad Ali	Ghulam Sarwar	GPS Dako Baba	Seri Behlol	03-02-1992	118.55 A.V.Post
376	Muhammad Ismail	Yar Gulab	GPS No1 Pir Abad	Seri Behlol	15-04-1993	117.54 A.V.Post
377	Shams Ur Rehman	Gul Hasan	GPS No1 Said Amin	Seri Behlol	10-04-1981	114.34 A.V.Post
378	Muhammad Adil	Mohr Dil Khan	GPS No1 Pir Abad	Seri Behlol	18-03-1992	110.49 A.V.Post
379	Alamgir	Mudam Khan	GPS No2 Umar Khan	Seri Behlol	04-03-1988	110.14 A.V.Post
380	Fida Muhammad	Mir Zaman	GPS Arabi Killi	Seri Behlol	21-05-1993	110.12 A.V.Post
381	Mauhammad Yasin	Muhammad Ashraf	GPS Dako Baba	Seri Behlol	04-03-1988	109.64 A.V.Post

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S/No	Name	F/Name	School	U/C	Date of Birth	Total Score	Remarks
382	Waheed Gul	Rehmat Gul	GPS Arabi Killi	Seri Behlol	12-03-1980	108.20	A.V.Post
383	Ala Muhammad	Faiz Muhammad	GPS Arabi Killi	Seri Behlol	14-03-1992	105.20	A.V.Post
384	Abdullah	Muhammad Ali Shah	GPS Gujrano Shafiq Abad	Seri Behlol	12-02-1988	104.19	A.V.Post
385	Muhammad Iqbal	Majeed Gul	GPS No2 Afzal Abad	Seri Behlol	22-04-1993	103.94	A.V.Post
386	Irshad Ahmed	Johar Zaman	GPS No1 Pir Abad	Seri Behlol	01-11-1981	103.38	A.V.Post
387	Muhammad Salim	Gul Amin	GPS Aman Ullah Banda	Seri Behlol	08-04-1987	101.10	A.V.Post
300	Shakir ullah	Gul Ahmad	GPS Dako Baba	Seri Behlol	13-08-1992	101.13	A.V.Post
300	Hussain Ail	Gul Shor	GPS Miagan Pir Abad	Seri Behlol	01-07-1994	100.61	A.V.Post
390	Sajid Ali	Fazal Wahid	GPS No.1 Afzal Abad	Seri Behlol	20-03-1993	100.50	A.V.Post
U/C Shahbaz Garhi							
391	Muhammad Imran Khan	Farzand Ali	GPS No.1 Baro Banda	Shahbaz Garhi	06-05-1991	123.75	A.V.Post
392	Sajid Iqbal	Iqbal Khan	GPS Narshak	Shahbaz Garhi	20-07-1989	111.76	A.V.Post
393	Muhammad Mahboobul Haq	Fazal Malik	GPS Laindoi	Shahbaz Garhi	21-04-1985	101.89	A.V.Post
394	Khalid Raza	Abdus Salam	GPS Shahbaz Garhi No.3	Shahbaz Garhi	03-02-1990	100.67	A.V.Post
395	Zamin Khan	Shor Zaman	GPS Gohar Khan Narshak	Shahbaz Garhi	07-03-1990	99.30	A.V.Post
396	Waqar Ahmad	Ghulam akbar	GPS No.2 Baro Banda	Shahbaz Garhi	15-04-1990	99.20	A.V.Post
397	Muhammad Albeeq Said	Jan Said	GPS Shahbaz Garhi No.1	Shahbaz Garhi	23-03-1986	98.79	A.V.Post
398	Muhammad Amir	Hussain Khan	GPS Chanaka Dhari	Shahbaz Garhi	01-03-1992	97.59	A.V.Post
399	Hamza	Burhan Ullah	GPS No.1 Baro Banda	Shahbaz Garhi	13-04-1991	97.34	A.V.Post
400	Waleed Ahsan Akbar	Faqir Akbar	GPS No.1 Baro Banda	Shahbaz Garhi	03-05-1993	94.93	A.V.Post
U/C Shamat Pur							
401	Muhammad Asadullah	Ainun Ullah	GPS Muhammad Wali	Shamat Pur	12-07-1985	114.54	A.V.Post
402	Muhammad Arif	Abdul Majeed	GPS Shamand Roz Killi	Shamat Pur	09-11-1982	114.17	A.V.Post
403	Hafiz Saifullah	Rahman Ullah	GPS Sowaryan	Shamat Pur	26-04-1986	110.37	A.V.Post
404	Ajmal Shah	Ghandaal Shah	GPS Muhammad Roz Killi	Shamat Pur	01-03-1991	103.22	A.V.Post
U/C Shamoza							
405	Syed Inayat Shah	Mubarak Shah	GPS Khan Zamir Banda	Shamoza	09-03-1991	135.17	A.V.Post
406	Muhammad Ali	Mir Dad Khan	GPS Shewa	Shamoza	04-01-1988	128.31	A.V.Post
407	Wali Khan	Haya Gul	GPS Palagi	Shamoza	13-02-1979	122.86	A.V.Post
408	Niamat Ali	Malang Jan	GPS Malha Derakai	Shamoza	02-01-1982	120.60	A.V.Post
409	Shakil Ahmed	Said Muhammad	GPS Shamoza	Shamoza	04-03-1992	119.12	A.V.Post
410	Zakir Shah	Hazrat Said	GPS Ghundo	Shamoza	01-01-1988	117.77	A.V.Post
411	Wiqar Ullah Khan	Asmat Ullah Khan	GPS Malha Khas	Shamoza	02-01-1987	115.50	A.V.Post
412	Sajjad Ali	Rahim Ullah	GPS Palagi	Shamoza	21-04-1986	114.66	A.V.Post
413	Tariq Nawaz	Muhammad Nawaz	GPS Aratoona	Shamoza	07-04-1980	114.55	A.V.Post
414	Jehangir Khan	Masoor Khan	GPS Spin khak	Shamoza	11-04-1990	113.16	A.V.Post
415	Mujeeb Ur Rehman	Syed Nazeef Shah	GPS Badar Banda	Shamoza	22-04-1986	112.28	A.V.Post
U/C Sher Garh							
416	Shahid Khan	Sadbur	GPS Ahmad Gul Killi	Sher Garh	03-03-1991	123.15	A.V.Post
417	Qasim	Lajbar Khan	GPS No2 Sher Garh	Sher Garh	15-04-1990	110.70	A.V.Post
418	Misbah Ud Din	Noor Ali Jan	GPS Nader Sher Killi	Sher Garh	00-03-1985	115.17	A.V.Post
U/C Takkar							
419	Khurshid	Nowshad	GPS Pali Khurd	Takkar	20-09-1981	125.33	A.V.Post
420	Sardar Ali	Jehan Zeb Khan	GPS Dil Aram Killi	Takkar	11-04-1990	117.60	A.V.Post
421	Salah Ud Din	Fazal Mohi Ud Din	GPS No2 Fazal Abad	Takkar	10-02-1985	112.13	A.V.Post
U/C Toru							
422	Malloob Ahmad	Fazal Muhammad	GPS Sandi Mar	Toru	12-12-1983	139.09	A.V.Post
423	Shahab Zeb Khan	Alam Zeb	GPS Toru	Toru	21-08-1989	115.33	A.V.Post
		Inaid Inhal	GPS No.1 Shamsad Abad	Toru	24-04-1992	114.94	A.V.Post

No	Name	F/Name	School	U/C	Date of Birth	Total Score	Remarks
425	Sher Afzal	Umar Khan	GPS Aminullah Koroona	Toru	21-03-1984	114.54	A.V.Post
426	Muhammad Zubair	Inayat Ullah	GPS Toru	Toru	28-01-1991	112.83	A.V.Post
427	Habib Ur Rahman	Zniban Shah	GPS Aminullah Koroona	Toru	03-12-1980	106.21	A.V.Post

Terms & Conditions:

- 1- No TA/DA etc is allowed.
- 2- Charge report should be submitted to all concerned in duplicate.
- 3- Appointment is purely on temporary and adhoc basis initially for one year w.e.f their taking over charge.
- 4- They should not be handed over charge if they exceeds 35 years or below 20 years except S.No.16,62,67,70,72,133,215,220,254,267,302,304,356,382,407 and 413 who have been granted sanction relaxation in upper age limit by the undersigned being competent authority.
- 5- Appointment is subject to the condition that the degree/certificate/documents must be verified from the concerned authorities by the Head of institution/Drawing Disbursing officer concerned and after verification their verified degrees/certificates should be sent to DEO Malo Mardan office for pay release order in case of fake/bogus certificate degrees detected later on their appointment order would be automatically cancelled from the date of appointment and will be reported to the law enforcing agencies for legal action.
- 6- If any valid appeal received regarding the appointment against any candidate, the appointment order of that candidate will be with drawn who is lowest in the merit in the school of the same U/C
- 7- Their services are liable to termination on one months prior notice from either side. In case of resignation without notice his on-months pay/allowances shall be forfeited to the Government.
- 8- They should join their post within 15 days, in case of failure their appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 9- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- 10- They will be governed by such rules and regulations as may be issued from time to time by the govt.
- 11- Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 12- Their appointment is made on school based, they will have to serve at the place of posting and their service is not transferable to any other station.
- 13- Before handing over charge once again their document may be checked if they have not the required relevant qualifications they may not be handed over charge.

(SIRAJ MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Endst:No. 2145-G1 Prg:Branch

Dated 25/03/2016

Copy forwarded for information and necessary action to the:-

- 1 PS to Minister for Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2 PS to Secretary to Government for Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3 Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 4 District Account Officer Mardan.
- 5 SDEO Malo Prg: Mardan and Takht Bhal.
- 6 DMO. IMU Mardan
- 7 EMIS branch local office
- 8 Official Concerned.
- 9 M/File

DISTRICT EDUCATION OFFICER
(MALE) MARDAN

(18)

چارچ رپورٹ

Annex B

من مسمیٰ خورشید دارا زشتار۔ پی ایس ٹی بروئے آرڈر نمبر 9-2145

2016/3/25 ڈی ای او بیل مردان آج بمورخہ۔ 2016/3/25 کو قبل از دوپہرا اپنے عہدے کا چارج لے لیا۔

گورنمنٹ پرائمری سکول ہائی فوریو
یونین کونسل

چارچ دہندہ

چارچ گرہندہ

M/M
HEAD TEACHER
G.P.S PATI KHURD
TAKHT BHAI

استاذ

19

Annexure "C"

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.
OFFICE ORDER.

Where as you Mr. Khurshid S/O Nowshad R/O U.C Takkar were appointed against PST post through NTS on adhoc basis at GPS Pati Khurd vide this office under Endst: No.2145/G Dated 2503-2016 at S.No.419.

Where as a complaint received against you that you have impersonate in the NTS test.

Whereas on the light of complaint this office made an inquiry committee, and the inquiry committee conduct inquiry against you.

Whereas the inquiry committee proved your impersonation in his recommendation.

Hence due to the impersonation the appointment order in r/o Khurshid S/O Nowshad R/O Takkar as PST GPS Pati Khurd vide Endst: No.2145/G Dated 25-03-2016 at S.No.419 is hereby with drawn w.e.f the date of its issuance.

NO = 4013

25/7/16

Respectively

vide order (SIRAJ MUHAMMAD)
DISTRICT EDUCATION OFFICER
Mardan (MALE) MARDAN

Endst: No. 539118

Dated 25/7/2016

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director FIA Khyber Pakhtunkhwa Peshawar.
3. DPO Mardan
4. Director NTS Peshawar.
5. Sub-Divisional Education Officer (Male) Takht Bhai.
6. District Comptroller Officer Mardan.
7. Mr. Khurshid S/O Nowshad R/O Takkar at present PST GPS Pati Khurd.
8. Official Concerned.

1985 Sam R 1178

DA Concerned
for information
M. T. Bhai
25/7

23/7/16
DISTRICT EDUCATION OFFICER
(MALE) MARDAN



Elementary and Secondary Education Department,
 Khyber Pakhtunkhwa (Screening Test)
 Appointment of Teachers (Adhoc School Based)
 Test held on: Saturday 21st, Sunday 22nd, Saturday 28th & Sunday 29th November 2015

(Updated Provisional Merit List)

Upload Date: Wednesday, 10th February 2016.

Search Result for the keyword " 281361 & PST BPS-12 "

An updated school based provisional list has been prepared on the basis of information provided by the candidates through application form and through queries in hard form.

Late announcement of result after submission of application form and without evidence were not entertained during preparation of provisional list.

Candidates are advised to contact with concerned DEO regarding submission of original documents as per their instructions.

District based scrutiny committee formed by the District Education Officer Concerned is responsible to check the original educational documents with academic record provided by the candidate to NTS.

Decision of the scrutiny committee will be final and are authorized to recommend for issuance of appointment order.

Merit No. 1

Roll No	Name	Father Name	CNIC	Gender	Post	PST BPS-12	School Code	School Name	School UC	Candidate UC	Religion	Disability	Candidate Domicile
452100956	SARDAR ALI	JEHAN ZEB KHAN	16102-6426372-3	MALE	12	281361	281361	GPS No.2 Fazal Abad	Takkar	TAKKAR	MUSLIM	NO	MARDAN
SSC		HSSC		Bachlor (Hons) (Year 1 & 2)		Bachlor (Hons) (Year 3 & 4)		Master		M.Phil		Diploma	
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total
543	1050	12.25	617	1100	11.22	0	0	0	0	0	0	0	0
BA 20%		HSSC 20%		Bachlor (Hons) 15%		Bachlor (Hons) 15%		MA 15%		M.Phil 5%		Diploma 15%	
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total
812	1000	4.06	63.26	63	126.26	0	0	0	0	0	0	0	0

Merit No. 2

Roll No	Name	Father Name	CNIC	Gender	Post	PST BPS-12	School Code	School Name	School UC	Candidate UC	Religion	Disability	Candidate Domicile
452500878	KURSHID	NAWSHAD	16102-22545-3-1	MALE	12	281361	281361	GPS No.2 Fazal Abad	Takkar	TAKKAR	MUSLIM	NO	MARDAN
SSC		HSSC		Bachlor (Hons) (Year 1 & 2)		Bachlor (Hons) (Year 3 & 4)		Master		M.Phil		Diploma	
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total
850	1225	560	1100	10.55	286	550	10.4	0	0	0	0	0	0
BA 20%		HSSC 20%		Bachlor (Hons) 15%		Bachlor (Hons) 15%		MA 15%		M.Phil 5%		Diploma 15%	
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total
51.33	74	125.33	51.33	74	125.33	0	0	0	0	0	0	0	0

Merit No. 3

Roll No	Name	Father Name	CNIC	Gender	Post	PST BPS-12	School Code	School Name	School UC	Candidate UC	Religion	Disability	Candidate Domicile
452500878	KURSHID	NAWSHAD	16102-22545-3-1	MALE	12	281361	281361	GPS No.2 Fazal Abad	Takkar	TAKKAR	MUSLIM	NO	MARDAN
SSC		HSSC		Bachlor (Hons) (Year 1 & 2)		Bachlor (Hons) (Year 3 & 4)		Master		M.Phil		Diploma	
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total
850	1225	560	1100	10.55	286	550	10.4	0	0	0	0	0	0
BA 20%		HSSC 20%		Bachlor (Hons) 15%		Bachlor (Hons) 15%		MA 15%		M.Phil 5%		Diploma 15%	
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total
51.33	74	125.33	51.33	74	125.33	0	0	0	0	0	0	0	0

Annexure - E 21



National Testing Service Pakistan

ROLL NO SLIP

Annexure-D

Appointment of Teachers (Adhoc School Based) in Elementary & Secondary Education Department, Khyber Pakhtunkhwa (Recruitment Test)

Roll No. 452600878

CNIC No. 16102-2254510-1

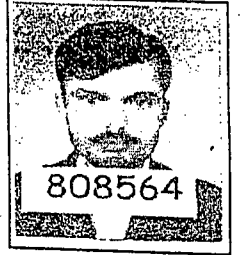
Dear: KHURSHID

Father Name: NAWSHAD

Paper Type: PST BPS-12(G-7)

Test Day & Date:

Saturday 28th November, 2015



Assalam O Alaikum!

You are required to appear for the above mentioned program at the center given below:

ANSI DEGREE COLLEGE, OPPOSITE MARDAN MEDICAL CAMPUS, MARDAN

***Note: You are provisionally allowed to appear in the test. Subject to verification of credentials and eligibility criteria.**

- Reporting time for test is **11:00 AM** Attendance will start at **11:30 AM** sharp.
- You are required to bring this **ROLL NO SLIP** along with your **Original National Identity Card (18 yrs age) or B Form / Matric Certificate (Less than 18 yrs age)** containing your photograph (Mandatory). Candidates failing to produce **Roll No. Slip and Original CNIC** would not be allowed to enter the examination hall.
- You are also required to bring a clipboard and ball pen (black or blue) with you.
- Mobile phones/Calculators or any other electronic device is not allowed.
- Keep visiting NTS website **www.nts.org.pk** for further information and test result.

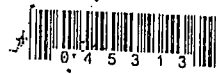
MOBILE PHONE IS NOT ALLOWED INSIDE TEST CENTER PREMISES (PLEASE DON'T BRING MOBILE PHONE)

ٹیسٹ سنٹر کی حدود میں موبائل لانا سختی سے منع ہے۔
انتظامہ موبائل اور الیکٹرانک آلات کے لیے آپ کی جامع تلاش لی جاسکتی ہے۔
اور برآمد ہونے کی صورت میں ضبط کر کے پیپر Cancel کر دیا جائے گا۔

***Candidates Above 18 years age must bring their Original National Identity Card or Passport and candidates below 18 years age must bring their B.form / Matriculation Certificate or Passport containing photograph otherwise you will not allowed to enter the testcenter.**

Manager Operations

Reg No :



To, 452600878
KHURSHID
VILLAGE DILARAM KILLI PATI KALAN POST OFFICE
AND TEHSIL TAKHT BHAI DISTRICT
MARDAN, TAKHT BHAI
District: Mardan
03339797783..

Postage Prepaid

From:
National Testing Service
1-E, Street No.46
Sector I-8/2 Islamabad

پوسٹ میں نوٹس برائے موبائل اسے Saturday 28th November, 2015 تاریخ سے پہلے پہنچائیں۔ وگرنہ NTS کو فوری واپس بھیجوائیں۔

22

MEDICAL CERTIFICATE

D.M. 371/MS/PA

Name of Official Khurshid 16102-2254510-1

Caste or Race Afghan

Father's Name Nawabzad

Residence Village Pati Kalan Tehsil Takhl Bhai
District Mardan

Date of Birth 20-9-1981 (As per CNIC)

Exact Height by measurement 5-6

Exact mark of Identification Mole on left hand

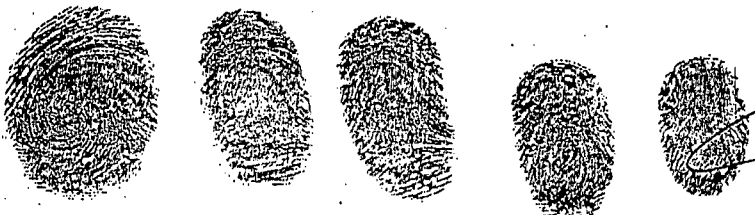
Signature of the Official [Signature]

Signature of the Head of Office

Seal of Office

I do hereby certify that I have examined Mr. Khurshid
for employment in the office of the DEC (Mol)
and cannot discover that he had any disease communicable or other constitutional
affection or bodily infirmity except FIT

I do not consider this is disqualification for employment in the office of the
above as DST BPS-12 his age according to his own statement
34 year and by appearance about year 34 yrs. FIT



LEFT HAND THUMB AND FINGER IMPRESSION

① F. 26-03-2016

[Signature]
26/03/2016
Medical Superintendent,
DHQ Hospital, Mardan.

**Medical Superintendent
DHQ Hospital Mardan**

To

(23)

The Director,
(ExSE) KPK Peshawar.

Annexure - 'F'

Subject: Representation against the order No. 5391/G dt. 25/7/16
issued by DEO(M) Mardan vide which the order No
2145/G dated 25/3/2016 at. Serial No. 419 is withdrawn
w.e.f the date of its issuance is illegal, against law,
facts, natural justice, and ineffective upon the rights
of the appellant and the said order is liable to be
set-aside and the appellant may kindly be reinstated
with entire Lach benefits.

Respectfully sheweth,

1. That the appellant namely Khureshid s/o Nowshad belongs to u/c Tabhar Teh/Tahht bahi Mardan.
2. That the appellant was appointed by the DEO(M) Mardan vide order No 2145/G dt. 25/3/2016 as PST at serial No. 419 after completion of entire codal formalities being eligible and deserving candidate.

Copy of Appointment order dt. 25/3/2016 is
attached as Annex. "A"

3. That in compliance of order dt. 25/3/2016, the appellant took over his charge at GPS Pati Khurd (پاتی خورد) on 26/3/2016 accordingly.

Copy of charge report is attached as Annex. "B"

(Contd. P-2)

4. That the appellant performed his duties to the entire satisfaction of his superiors and it was to the utter shock and dismay when he received the impugned office order dt. 25/7/2016 on 16/8/2016 which is illegal against law, facts, record, natural justice and ineffective upon the rights of the appellant and the said order is liable to be set-aside. copy of impugned order dt. 25/7/2016 is attached
as Annex. "C"

5. That the charges of Impersonation against the appellant are totally baseless, because the appellant is a qualified person and achieved the said PST post purely on merit.

6. That the appellant is a civil servant and the DEO(M) Madan has not treated the appellant according to rules and passed an harsh and illegal order without any justification and sufficient grounds, which order is liable to be set-aside.

7. That the appellant was not served with any show cause, / charges of allegation and he remained unheard which is against Law and natural justice.

(P-3) 25

8.

That the appellant is a young and energetic person and started his professional career with the commitment to serve the nation, and the DEO(M) Mauvan malefidey withdrawn the appointment order of the appellant which is unfair, and illegal.

Therefore it is humbly prayed that by accepting the instant appeal the impugned order dt. 25/7/2016 may kindly be set-aside and the appellant may kindly be reinstated with entire back benefits.

dt. 18/8/2016.

Appellant →

Khushid (PST)

GPS Pati Khurd

Distt. Mauvan.

Khurshid S/O Nawshad

Village Patikalan Tehsil & P/O. TakhtBhai District Mardan

Contact No :-0345-9344578



Objective :

Willing to work in highly competitive environment and to show brilliant skill in the field of education. To make

the education universal. To produced educated personnel and positive thinking among the coming generation.

Personal Information:

Domicile	Mardan (Khyber Pakhtunkhwa)
Religion	Islam
Languages	Pashto , Urdu , English

Education:

SSC	From B.I.S.E. Peshawar
FA	From B.I.S.E. Peshawar
BA	From University Of Peshawar
MA Urdu	From University Of Peshawar
M.Phil Urdu	From Northern University Nowshera
PTC	From A.I.O.U. Islamabad
C.T.	From A.I.O.U. Islamabad
B.ED.	From A.I.O.U. Islamabad

Experience:-

Ten Years Experience as Urdu Teacher in Hira Higher Secondary School

2018 PLCCS) M-48-Peshawar

2019 SCMR 643-Supreme Court

(Comments)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No: 1408/2017

Khursheed S/O Noushad R/O Village Takar Takhat Bhai, District Mardan.

(Appellant)

Versus

The Director (E & SE) Education Khyber Pakhtunkhwa & Others. (Respondents)

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	04
2.	Copy of Order.	A	05	----
7.	Copy application to DPO	B	06	02 --
8.	Copy of Inquiry Report/Personal Hearing	C	08 7	13 14
9.	Copy of NTS Application Forms/CCTV Photage	D	16 15	18 18
10.	Copy of Attendance sheet	E	20 19	--

Respondents

Distriet Education Officer
(Male) Mardan

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No: 1408/2017

Khursheed S/O Noushad R/O Village Takar Takhat Bhai, District Mardan.
(Appellant)

Versus

The Director (E & SE) Education Khyber Pakhtunkhwa & Others. (Respondents)

Para Wise Comments on Behalf of Respondents No 1,2 & 4

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action as well as locus standi to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to this Honorable Tribunal with clean hands.
6. That the appellant is estopped by his own conduct.
7. That the appellant has concealed the material facts from this Honorable Tribunal hence the appeal liable to be dismissed.
8. That the instant appeal is liable to be dismissed for non-joinder of necessary / mis-joinder of unnecessary parties.
9. That the instant appeal is based on malafide intention, hence the appeal is liable to be dismissed.
10. That the instant appeal is against the prevailing law and rules.
11. That after fulfillment of all the codal formalities the appellant was withdrawn from Service for the charges of impersonation in the NTS test vide order Endst No 5391/G dated 25-07-2016 in accordance with law.

(Copy of Order is as Annexure- "A")

12. That after fulfillment of all the codal formalities, the respondent submitted an application to the DPO (Mardan) for the registration of FIR under the relevant section of law against the appellant.

(Copy of application as Annexure B)

ON FACT:

1. Para No 1 pertains to record, hence need no comments.
2. Para No 2 pertains to record, hence need no comments.
3. Para No 3 pertains to record, hence need no comments.
4. Para No 4 pertains to record, hence need no comments.

5. Para No 5 is incorrect baseless, against facts as the inquiry report and the evidence received from the NTS administration also prove the impersonation on the part of the appellant, and the inquiry officer stated that the appellant has utilized another unknown person as impersonator who resembles him but from every angle is different. His specimen signatures and the signature in the NTS attendance Sheet during the Test are completely different from each other. the appellant was also given a chance of personal hearing as per law but he has badly failed to defend himself.
(Copies of inquiry, NTS application form & Attendance sheet as Annexure C, D&E)

6. Para No 6 pertains to record, hence need no comments
7. The detail replies of the grounds are as under

GROUND:

- A. Para A is incorrect, baseless, against fact & law, the answering respondent acted in accordance with the law, hence denied.
- B. Para B is incorrect, baseless, against law and fact as the respondent being a responsible government officers acted in accordance with law, hence denied.
- C. Para No C is incorrect, baseless, against law and fact as the enquiry are proper conducted against the appellant and the allegations of misconduct are proved against the appellant, hence denied.
- D. Para D is incorrect, baseless, against law and fact as the respondent being a responsible government officers acted in accordance with law, hence denied.
- E. Para No E is incorrect, baseless, against law and fact as the enquiry has proper conducted against the appellant and the appellant was also given a chance of personal hearing as per law, hence denied.
- F. Para No F is incorrect, baseless, against law and facts, as the appellant was given a chance to explain his position but he has badly failed which is proved his involvement, hence denied.
- G. Para G is incorrect, the answering respondent acted in accordance with the law, hence denied.

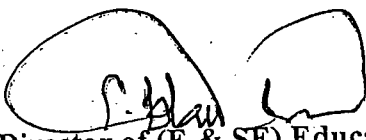
Para H is incorrect, baseless against facts, as thoroughly explain in the above paras, hence denied.

I. The respondent seek permission to raise additional grounds at the time of arguments.

It is therefore humbly prayed that in the light of above facts, the appeal may please be dismissed with cost.

Respondents No 1, 2 & 4


District Education Officer
(Male) Mardan


Director of (E & SE) Education
KPK Peshawar.


Secretary of (E & SE) Education
KPK Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No: 1408/2017

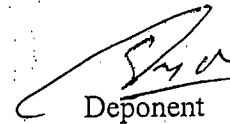
Khursheed S/O Noushad R/O Village Takar Takhat Bhai, District Mardah.
(Appellant)

Versus

The Director (E & SE) Education Khyber Pakhtunkhwa & Others. (Respondents)

AFFIDAVIT

I, Mr. Sajid Khan Legal Advisor Education Department Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by Respondents No 1 to 3 are true to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


Deponent

Sajid Khan
16101-6005318-5

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.
OFFICE ORDER.

Where as you Mr, Khurshid S/O Nowshad R/O U.C Takkar were appointed against PST post through NTS on adhoc basis at GPS Pati Khurd vide this office under Endst: No.2145/G Dated 2503-2016 at S.No:419.

Where as a complaint received against you that you have impersonate in the NTS test.

Where as on the light of complaint this office made an inquiry committee, and the inquiry committee conduct inquiry against you.

Where as the inquiry committee proved your impersonation in his recommendation.

Hence due to the impersonation the appointment order in r/o Khurshid S/O Nowshad R/O Takkar as PST GPS Pati Khurd vide Endst: No.2145/G Dated 25-03-2016 at S.No.419 is hereby with drawn w.e.f the date of its issuance.

(SIRAJ MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Endst: No. 539119

Dated 25/7/16 /2016.

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director FIA Khyber Pakhtunkhwa Peshawar.
3. DPO Mardan
4. Director NTS Peshawar.
5. Sub-Divisional Education Officer (Male) Takht Bhai.
6. District Comptroller Officer Mardan.
7. Mr, Khurshid S/O Nowshad R/O Takkar at present PST GPS Pati Khurd.
8. Official Concerned.

DA Concerned
For information
M. Chohan M.
EDDO
M. T. Blou
25/7

23/7/16
DISTRICT EDUCATION OFFICER
(MALE) MARDAN



Annexure B (6)

DISTRICT EDUCATION OFFICER

(MALE) MARDAN.

No. 5718 / Dated 6/18 /2016.

To,

The DPO
District Mardan.

Subject: APPLICATION FOR THE REGISTRATION OF AN FIR UNDER THE RELEVANT SECTION OF LAW AGAINST THE CANDIDATES MENTIONED BELOW AT DISTRICT MARDAN ON CHARGES OF IMPERSONATION IN THE NTS TEST HELD ON 28-29/11/2016 AGAINST THE POST OF PST BPS-12.

Memo:-

It is stated that during the NTS test as conducted by the NTS authority for the appointment of PST post in the Elementary & Secondary Education Department at District Mardan, the below mentioned officials / candidates have been guilty of impersonation in the NTS test held on 28-29/11/2015 which is evident from the proof provided by the NTS administration on the demand of the undersigned. the written complaints also filed by various candidates.

Therefore it is requested that an FIR under the relevant section of law may registered against the accused/officials/candidates mentioned below.

Sr #	Name of Candidate	Father Name	U/C Address	Name of Impersonator	F/Name of Impersonator	Address of Impersonator
1	Kashif Muhammad 16102-6942855-3	Dost Muhammad Khan	Bahram Khan Killi U/C Parkho	Jamil Ahmad 16102-0195905-3	Muhammad Bashir	CT GMS Mahmood Abad Vill Kalo Shah Takht Bhai
2	Zakria 16102-7380122-5	Hazrat Ahmad	Diyar Abad U/C Parkho	Arshad	Feroz Khan	Unknown
3	Ibrahim Shah 16102-2290759-3	Painda Shah	Mohallah Shah Ba Khel U/C Takkar	Photo Available.		Unknown
4	Muhammad Ali 16102-4095893-5	Alam Baz	Shah Noor Pul PO Takkar U/C Narai	Photo Available.		Unknown
5	Luqman Shah	Alam Baz	Shah Noor Pul PO Takkar U/C Narai	Muhammad Ali 16102-4095893-5	Alam Baz	Shah Noor Pul Takht Bhai
6	Khurshid 16102-2254510-1	Noshad	Vill Pathi Kala U/C Takkar	Photo Available.		Unknown
7	Ifthikkhar Ali 16102-2872499-5	Shaukat Ali	Vill Khat Killi Kutab Ghar Takht Bhai U/C Pir Saddi	Rasheed Khan	Misal Khan	PST GPS Sharif Malak Killi
8	Miraj Ul Haq 16102-9939053-1	Shah Nazar	Gujrano Killi U/C Pir Saddi	Rasheed Khan	Misal Khan	PST GPS Sharif Malak Killi
9	Owais Khan 16102-3242572-5	Rehmat Said	U/C Tor Dher Madi Baba	Zeeshan 16102-0867357-1	Wali Rehman	Village & PO Tor Dher

Siraj Muhammad
District Education Officer
(Male) Mardan

Annexure C

7

OFFICE OF THE PRINCIPAL

GHS BABUZAI KATLANG MARDAN

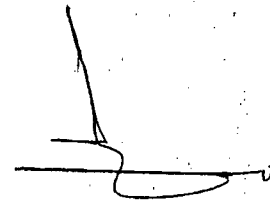
DATED 27/06/2016 NO 271

DISTRICT EDUCATION OFFICER MALE
ELEMENTARY AND SECONDARY EDUCATION
MARDAN

SUBJECT; ENQUIRY REPORT AGAINST THE IMPERSONATION CASE OF MR
IBRAHIM SHAH S/O PAIANDA SHAH, MR MUHAMMAD ALI S/O ALAM BAZ, MR
LUQMAN SHAH S/O ALAM BAZ, MR KHURSHID S/O NAWSHAD IN NTS TEST FOR
THE POST OF PST HELD ON 28/11/1015

RESPECTED SIR

FINED THE ABOVE ENQUIRY REPORT ATTACHED.



PRINCIPAL
GHS BABUZAI KATLANG
MARDAN

8

2

ENQUIRY AGAINST; IBRAHIM SHAH, MUHAMMAD ALI, LUQMAN SAND ^{Shah}
KHARSHID IMPERSONATION CASE

EXAMINATION/TEST;

NTS

APPLIED FOR THE POST OF;

PST

ENQUIRY OFFICERS;

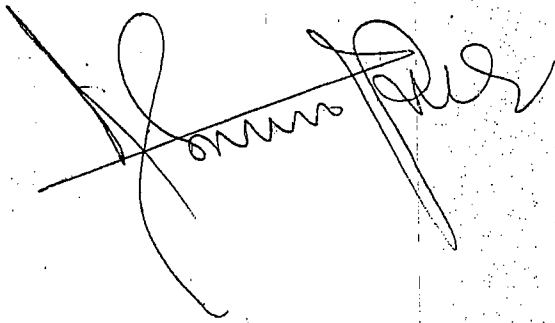
1; MR. ARSHAD HUSSAIN PRINCIPAL GHS
BABUZAI

KATLANG MARDAN

2; MR. ABDUL KHALIQ ADEO SHER GHAR
CIRCLE

ASSIGNED BY;

DISTRICT EDUCATION OFFICER MALE ELEMETARY
AND SECONDARY MARDAN



(8) (2)

ENQUIRY REPORT AGAINST THE IMPERSONATION CASE OF MR IBRAHIM SHAH S/O PAIANDA
SHAH, UC TAKKAR, MUHAMMAD ALI S/O ALAM BAZ, KHURSHID S/O NAWSHAD AND LUQMAN
SHAH S/O ALAM BAZ IN THE NTS EXAMINATION FOR PST IN ELEMENTRY AND SECONDARY
EDUCATION KPK FOR UNION COUNCIL TAKKAR AND NARAI HELD ON: November 28, 2015

No. 271

Dated 07/06/2016

Committee Members

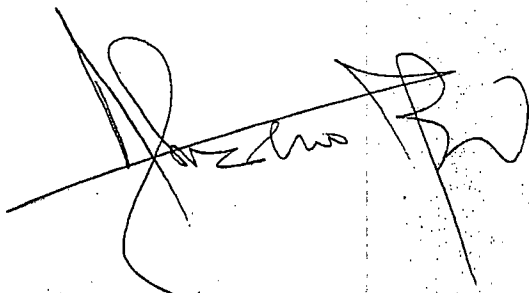
- 1; Arshad Hussain
Principal GHS Babuzai Katlang Mardan (Chairman)
- 2; Mr Abdul Khaliq
ASDEO Sher Ghar Jalala circle Mardan. (Member)

Dates of Enquiry

17/05/2016
19/05/2016
24/05/2016
29/05/2016
02/06/2016

Venue

- 1; GHS BABUZAI KATLANG Mardan
2; DEO MALE OFFICE Mardan
3; DEO (Male) Office Mardan
4; GPS JALALA MARDAN
5; VILLAGE TAKKAR



10

14

Subject:

Enquiry in impersonation case for the post of PST through NTS Examination.

Introduction:

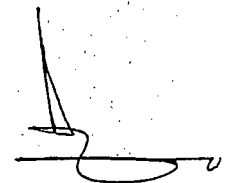
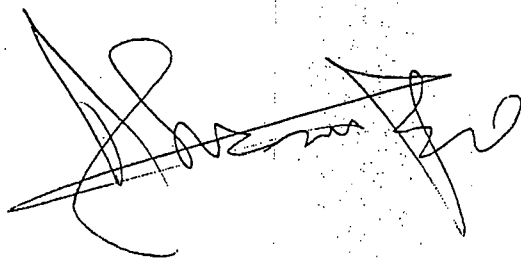
According to the DEO Male Mardan Notification No 3410-11/G/Pr Branch Dated 17/05/2016 a committee was constituted to find out the ground realities about the impersonation case in the examination of NTS for the post of PST against Ibrahim Shah S/O Paianda Shah U/C Takkar, Muhammad Ali s/o Alam Baz U/C Narai, Khurshid U/C Takkar Thehsil Takht Bhai District Mardan.

Brief History

Honourable District Education Officer Male Elementary and secondary Education Mardan was informed through some reliable source that for the post of PST the above mentioned candidates Mr Ibrahim Shah ,Muhammad Ali ,Khurshid belong to Takkar Union Council and Narai have made other persons sat as impersonators on their seats in the NTS Examination held on 28/11/2015 at their NTS Examination centers. District Education Officer Male Mardan constituted a committee comprising Mr Arshad Hussain Principal GHS Babuzai Katlang Mardan and Mr Abdul Khaliq ASDEO Sher Ghar Circle to probe into the matter and find out the ground realities and also bring the person involved in the case into light.

Procedures adopted

The committee met and discussed the matter in the light of all the essential documents i.e supposed photographs of Mr Ibrahim Shah, Muhammad Ali and Mr Khurshid, their applications for the NTS tests provided by the National Testing Services, they were summoned through a letter at GHS Babuzai Katlang Mardan on dated 23/05/2016. A questionnaire was given to each having the same pattern which are attached with the enquiry report. their fresh

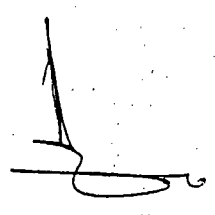
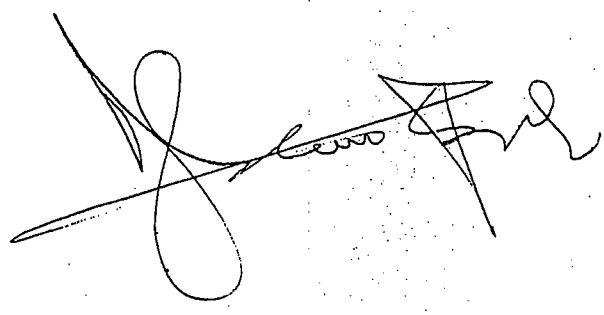


documents and photographs received and Their specimen signatures were collected .A verbal open discussion was held with them. We asked them about the persons involved in impersonation about whom they were not ready to tell their names and told us that they had taken the test themselves. In the light of all the above facts we found out the following realities.

Findings

We found clear difference and impersonation when we compared their photographs with the photos provided by your office obtained from the NTS department. Similarly there was clear inconsistency between the NTS provided signatures in the Examination admission forms and attendance sheets in the NTS test, the signatures obtained on the spot of the accused candidates . In the light of all available documents we pointed out that Mr Ibrahim Shah S/O Paiana Shah had clearly fixed the photo of another person on the NTS form while the impersonator is another person who had taken the test on behalf of him. It means that the first one whose photo had been fixed on the examination form was not available therefore a third person was sat in the test as impersonator but unfortunately he has not been traced yet. It was also found that Mr Ibrahim Shah has fixed the first impersonator's photo on his own identity card and obtained photo state copy which was attached with the NTS form. His specimen signatures is completely different from the NTS attendance sheet and admission form. Similarly Mr Muhammad Ali S/O Alam Baz has sent his own photo and identity card to the NTS but he has selected an unknown person who resembles him as impersonator for his own in the NTS test. And the impersonator is expected to be found very soon for some necessary information have been received. We also compared his specimen signatures with the NTS provided signature which are totally different from each other. We also came to know that Mr Muhammad Ali himself has taken the test for his brother Mr Luqman Shah S/O Alam Baz who is working in foreign at present. MR Kurshid has also made a person sat in the NTS test for his own who resembles him in face structure but from every angle and investigation is clearly impersonation. His specimen signatures obtained from him during investigation and his attendance signature are clearly different from each other.

All the relevant documents and proofs are attached with the inquiry report.



12

3

conclusion

In the light of above facts and after a methodical study of the case it is resulted that all the above candidates have used the following illegal ways and means in the NTS test for their appointment.

1; Mr Ibrahim Shah union council Takkar has changed his photo in his photo state identity card sent to NTS for test but due to non availability of that person he has made sat another unknown person for his own as impersonator. He has also marked Peshawar as NTS test center so that no one could know the impersonator. His specimen signatures and attendance signature in NTS are different from each other.

2; Mr Muhammad Ali has made sat an unknown person who resembles him as impersonator for his own . His photo graph is attached with the inquiry report. Specimen signatures of Mr Muhammad Ali is completely different from the signature provided by the NTS. It means that is hundred percent clear impersonation case.

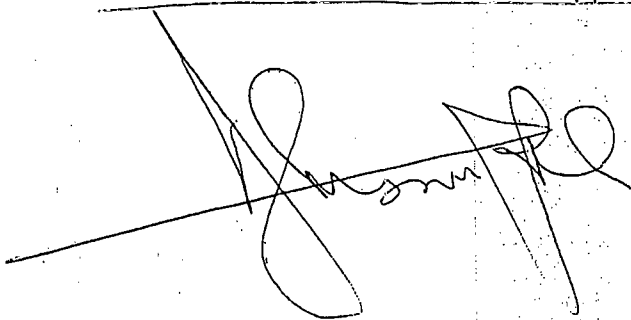
Moreover, it has also been pointed out that Muhammad Ali permanently belongs to District Charsadda as per his provided CNIC to the NTS.

3; It is also clear that Mr Muhammad Ali has taken NTS test for his own brother Mr Luqman Shah working at foreign country. It is expected that Mr Muhammad Ali has plainly taken the test for his brother. Probably he thought that other people would see him in the examination center and would not observe his own impersonator.

4; Mr Khurshid S/O Nawshad has utilized another unknown person as impersonator who resembles him but from every angle is different . His specimen signatures and the signature in the NTS attendance sheet during the test are completely different from each other.

Recommendations

1. All the four candidates i.e Ibrahim Shah S/O Paianda Shah , Muhammad Ali S/O Alam Baz , Luqman Shah S/O Alam Baz and Khurshid S/O Nawshad may please be dropped from the merit list for the said post and the next eligible candidates be given a chance for appointment.



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2. NTS Organization may please be requested to introduce Bio Metric system during the examination/test.

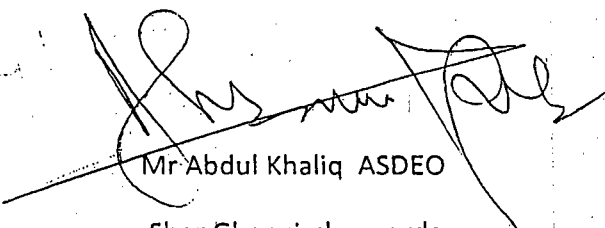
3. The impersonators in the case of Ibrahim Shah, Muhammad Ali and khurshid may please be dug out through Law enforcement agencies and be given exemplary punishment so as to eradicate this anti state evil.

Enclosures

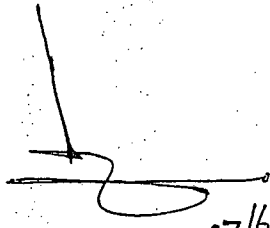
- 1; Photographs of all the accused candidates. Questionnaires given to them and their replies.
- 2, Original and Photostat copy of the NTS forms of all the candidates except the original NTS form of Iqman Shah S/O Alam Baz.
- 3, Written statement of Mr Ibrahim Shah in his favour.

Note; This enquiry report contains seven pages and each has been signed by us

Enquiry Officers


Mr Abdul Khaliq ASDEO

Sher Ghar circle mardan


07/6/2016
Mr Arshad Hussain

Principal GHS Babuzai Katlang Mardan

1 نام = عورشید

2 دلفون نمبر

3 گائون ہائی سکول تحصیل ڈوستان تحصیل بھائی

4 تعلیمی قابلیت سے اہم عمل اردو جاری

5 یاں میں نے آڈیو ٹیسٹ کے apply کیا تھا

6 + + +

7 0345-93 44578

8 جی یاں فور ٹیسٹ دیا ہے

9 مقررہ ہے

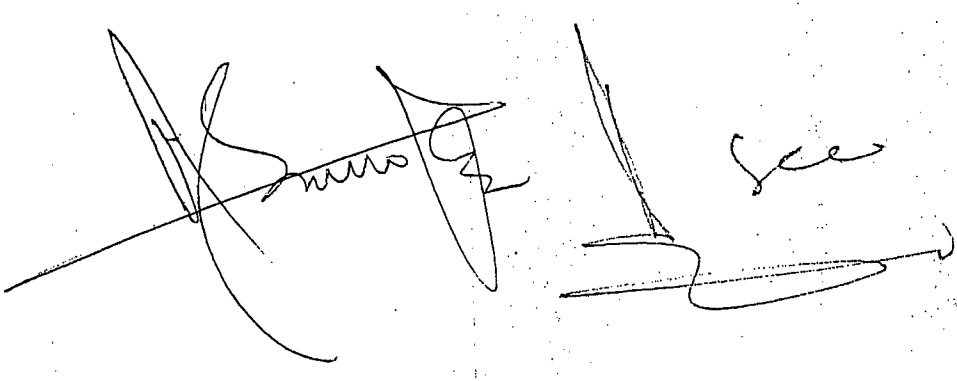
10 ریگسٹر 452600 878

11 NTS کے اچھے ادارہ سے اور اس کو مزید صرفی

کی ضرورت ہے اور اس کو مزید آگے بڑھانا چاہیے

12 میں نے NTS ٹیسٹ آنس ڈیسک کے نام سے مقررہ

مقررہ ٹیسٹ کے نام سے 28 نومبر 2008 کو دیا ہے



Annexure D-15



حکومت پاکستان
دہلی شناسی ادارہ
16102-2254510-1



تعلیم ارشد تعلیم
20/09/2015
دستور و دستور العمل

NTS National Testing Service-Pakistan
Building Standards in Educational and Professional Testing

NTS COPY
Elementary and Secondary
Education Department.

Unique ID: _____ Date: 24-8-15

Branch Code: _____ Branch Name: H.B.L

ONLINE DEPOSIT SLIP
(* Please deposit fee in only one bank & get the relevant bank)

Allied Bank Limited Branch: I-4 Markaz Branch Islamabad (0140947) A/C: NTS-Pakistan-Collection A/C: 001000433160018 Note: Bank Service Charges Free of Cost	Alfalah Commercial Bank Branch: I-4 Markaz Branch, Islamabad (11511) A/C: NTS-Pakistan A/C: 647943831003775 Note: Bank Service Charges Free of Cost
UNITED BANK LIMITED Branch: Cantt Br Kashmir Road Rawalpindi (00411) A/C: NTS-Pakistan A/C: 217767828 Note: Bank Service Charges Free of Cost	HABIB BANK LIMITED Branch: H9 Shalimar Recording Co ISB (1742) A/C: NTS-Pakistan A/C: 17427900464303 Note: Bank Service Charges Free of Cost

*Note: Desired Bank Stamp is required on the Deposit Slip & Send Original Deposit Slip (NTS Copy) along Application Form to NTS Office

Application Form will not be entertained without Original Deposit Slip (NTS Copy)

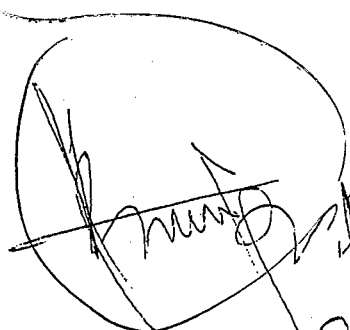
Applicant's Name: KHURSHID
 Father Name: NAWSHAD
 CNIC No: 16102-2254510-1

Amount: 800/- Amount in words: Eight Hundred Rupees Only
 Rs: Non Refundable/ Non Transferable

Applicant Signature: _____ Cashier: _____
 24 AUG 2015
 G-5

personally altered this officer
on 17/5/2016

Difference between the signature in
NTS form and this specimen
Suspicious signature



Difference between the photos
and signatures in NTS form
and specimen signature

(OFF) _____ (RES.) _____ (Mobile) 0333-9797783
Mandatory (Candidates who are not having their own network, sim (Ported Networks) will not receive sms from NTS)

Are you a Government Servant? Yes No
 If Yes, please attach NOC If Yes then total years of continuous experience: _____

Are you a Disabled Person? Yes No
 If Yes, please attach Disability Certificate If yes, state nature of your disability: _____

4. Religion: Muslim Non-Muslim
 If Non Muslim, Please Specify: _____

13. Union Council: TAKKAR

14. District of Domicile: Fill Only One Box (Mandatory)

01. <input type="checkbox"/> Abbottabad	02. <input type="checkbox"/> Bannu	03. <input type="checkbox"/> Battagram	04. <input type="checkbox"/> Buner
05. <input type="checkbox"/> Charsadda	06. <input type="checkbox"/> Chitral	07. <input type="checkbox"/> Dera Ismail Khan	08. <input type="checkbox"/> Hangu
09. <input type="checkbox"/> Haripur	10. <input type="checkbox"/> Karak	11. <input type="checkbox"/> Kohat	12. <input type="checkbox"/> Kohistan
13. <input type="checkbox"/> Lakk Marwat	14. <input type="checkbox"/> Lower Dir	15. <input type="checkbox"/> Malakand	16. <input type="checkbox"/> Mansehra
17. <input checked="" type="checkbox"/> Mardan	18. <input type="checkbox"/> Nowshera	19. <input type="checkbox"/> Peshawar	20. <input type="checkbox"/> Shangla
21. <input type="checkbox"/> Swabi	22. <input type="checkbox"/> Swat	23. <input type="checkbox"/> Tank	24. <input type="checkbox"/> Tor Ghar
25. <input type="checkbox"/> Upper Dir			

15. Academic Information: (Please do not attach attested copies of your academic certificates at this stage)

- NTS will not issue Roll No Slips to those who have not filled in their academic record properly.
- Candidate should convert their grades into marks. (O Level/A Level or any other degree having grade.)
- Write exact degree name & major subject mention in certificate/transcript.

Certificate/Degree Name	Degree Title	Specialization/Major Subject	Year Passing	Obtained Marks / CGPA	Total Marks / CGPA	Board/University
Matric (10 Years)	SSC		1998	521	850	Peshawar
Intermediate (12 Years)	FA		2000	580	1100	Peshawar
Bachelor (16 Years)	BA		2006	654	800	AI-Ichani
Master (16 Years)	MA		2008	739	1000	AI-Khoni
NOTE: In case of Honors Degree calculate your marks As 14 years (first 2 years) and 16 years (last 2 years) & write in the relevant column.						
Bachelor (Honors) (16 Years)				Obtained Marks (Year 1 & Year 2)	Total Marks (Year 1 & Year 2)	
				Obtained Marks (Year 3 & Year 4)	Total Marks (Year 3 & Year 4)	
M.S./M.Phil/Ph.D. (19 Years)						

16. Professional Qualification:

Certificate/Diploma	Certificate Name	Year Passing	Obtained Marks	Total Marks	Board/University
Relevant Diploma/Certificate/Degree	PTC	2009	648	900	AICCP
M.Ed/M.A Education	<input type="checkbox"/> M.Ed <input type="checkbox"/> M.A Education				

(17)

Code and Name Preferences: (Mandatory) Forms without properly filled School Codes will be rejected

accurate codes for the required school.

schools with codes at NTS website (www.nts.org.pk).

برائے سرکاری اسکول سے متعلقہ کورسز کے اندر داخلہ کریں۔
کونز اور متعلقہ کورسز NTS ویب سائٹ (www.nts.org.pk) پر تلاش کریں۔

School Code	District	School Name
281360	Mardan	GPS Dilaram kille
281361	-do-	GPS No. 2 Fatah Abad
281362	-do-	GPS Paji Khurd

Undertaking By The Applicant:

I Khurshid d/s/w of Naushad do hereby solemnly declare and affirm that I have read and understood the instructions and conditions for appearing in the NTS Test, and I have filled-up the application form as per instructions given below. In case of any information contained herein is found at any stage to be missing, untrue, false or forged, my candidature can be canceled at any stage (even after employment, if so revealed later), and I shall be liable to legal action.

Picture

Date: 24-08-15

Signature of the Candidate

Check List Provide the following documents other wise Application Form will not be entertained

- Original Bank Deposit Slip (NTS Copy)
- 2 Passport size color photograph to be attached in the picture box area on page (1 & 3)
- Copy of CNIC

General Instructions / Information:

- By Hand submission of Application Form is not allowed.
- Mobile Phones are not allowed in Test Center premises.
- Use separate envelop and separate application form for each post you are applying for.
- **Last date for submission of application form is Friday 28th August, 2015**
- **Applications received on or after Saturday 29th August, 2015 will be rejected.**
- Application should reach NTS office latest by last date of submission of Application Form.
- NTS will not be responsible for late receiving of application through courier / Pakistan Post etc.

HELP LINE:

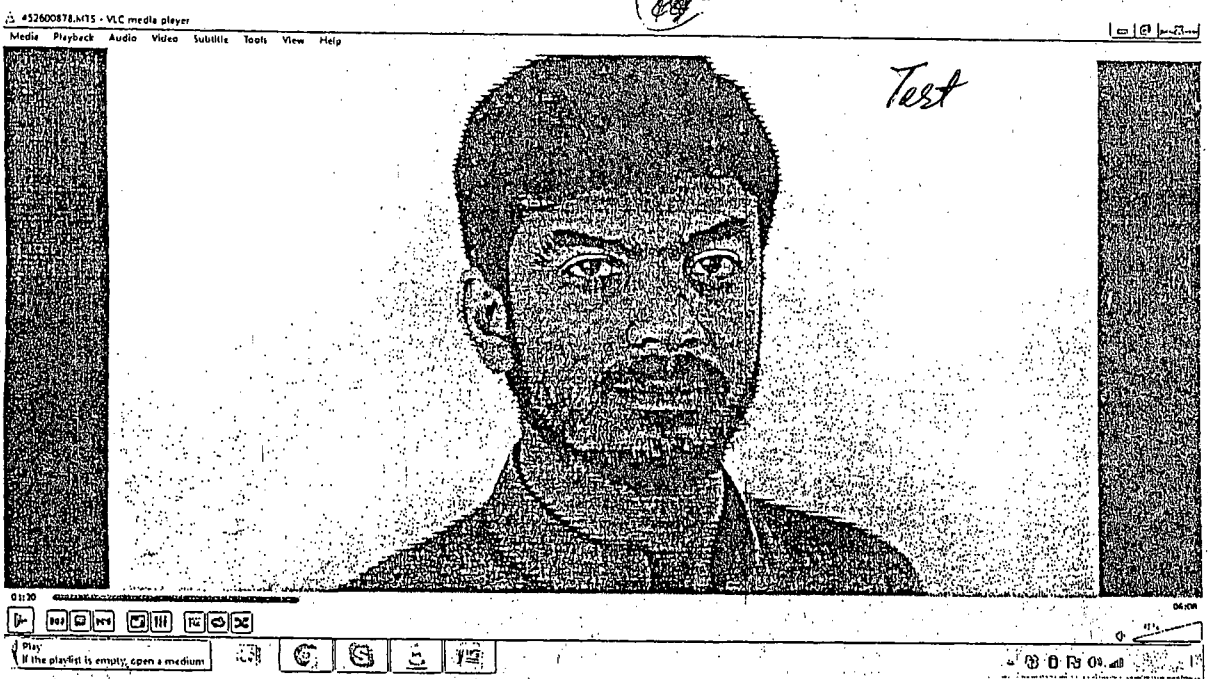
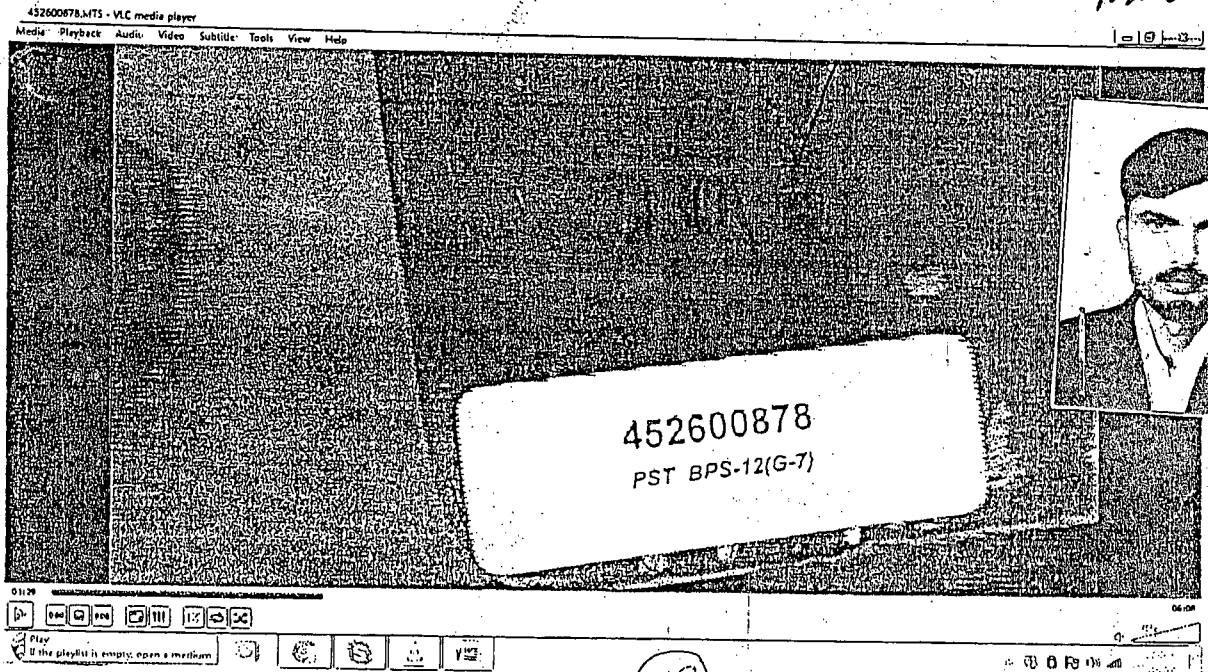
UAN : +92-51-844-444-1
Website: www.nts.org.pk

Please Send Application Forms to:

ESED KP (Project)
National Testing Service
1-E, Street No. 46, Sector I-8/2,
Islamabad.

RSHID - 452600878

Form



Spec

[Large handwritten signature]

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

Appeal No. 1242/2017

W.P No. 3702P/2016



Owais Khan S/o Rahmat Said (Ex-PST) Govt. Primary School Yakh Kohi, U/c Mady Baba Tehsil Takht Bhai District Mardan.

..... Petitioner

Versus

1. The District Education Officer, Mardan.
2. The Director E&SE KPK, Peshawar.
3. The Secretary, E&SE KPK, Peshawar.
4. The Govt. of KPK through Chief Secretary KPK, Peshawar.
5. Fazal Ullah, PST Govt. Primary School Yakh Kohi, U/c Mady Baba Tehsil Takht Bhai District Mardan.

..... Respondents

*The Chairman/Registrar
NTS, Ministry Peshawar
order dated
16/10/17*

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 AGAINST THE IMPUGNED ORDERS NO. 5708-9 DATED 06/08/2016 (COMMUNICATED ON DATED 30/09/2016) AND NO. 7522/G DATED 29/09/2016 TO THE EXTENT OF ILLEGAL APPOINTMENT OF RESPONDENT NO 5, WHEREIN THE PETITIONER'S APPOINTMENT DATED 25/03/2016 HAS BEEN WITHDRAWN AND RESPONDENT NO 5 APPOINTED AGAINST THE SAID VACANT POST OF PETITIONER, WHICH IS ILLEGAL, AGAINST THE LAW AND FACTS, HENCE UNTELLABLE AND LIABLE TO BE SET ASIDE.

FILED TODAY
Deputy Registrar
05 OCT 2016

ATTESTED

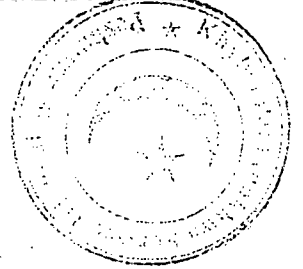
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Appeal No. 1242/2017

Date of Institution ... 10.11.2017

Date of Decision ... 01.12.2020



Owais Khan S/O Rahmat Said (Ex-PST) Govt: Primary School Yakh Kohi, U/C
Mady Baba Tehsil Takht Bhai District Mardan. ... (Appellant)

VERSUS

The District Education Officer, Mardan and five others.

... (Respondents)

Present:

MR. AKHUNZADA ASAD IQBAL,
Advocate

--- For Appellant.

MR. MUHAMMAD JAN,
Deputy District Attorney

--- For respondents.

MR. FAZAL SHAH MOHMAND
Advocate

--- For respondent No.5

MR. MIAN MUHAMMAD,
MR. HAMID FAROOQ DURRANI

--- MEMBER(Executive)
--- CHAIRMAN


JUDGEMENT.

MIAN MUHAMMAD, MEMBER:- The Peshawar High Court, Peshawar heard the writ petition No. 370-P/2016 on 26.10.2017 and instead of returning or dismissing the petition, sent it to the Khyber Pakhtunkhwa Services Tribunal with the direction to be treated as service appeal and decided in accordance with law.

FACTS.

02. Brief facts of the instant case are that the appellant applied for the post of PST(Primary School Teacher) through NTS and qualified the test conducted by the NTS. He was appointed as PST (BPS-12) on adhoc basis for one year vide office

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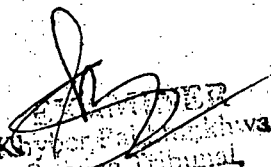

CHAIRMAN
Khyber Pakhtunkhwa
Services Tribunal,
Peshawar

order dated 25.03.2016. The appellant submitted his arrival report on 26.03.2016 and started performing his duties. However, his appointment order was withdrawn on 06.08.2016 and private respondent No.5 was appointed vide office order dated 29.09.2016 by respondent No.1. Both these office orders have been impugned and assailed in the writ petition now converted in Service Appeal before the Services Tribunal for adjudication.

03. Respondents were summoned to produce relevant record and connected documents. They attended the Services Tribunal through their legally authorized representatives who contested the appeal on their behalf. We have heard the pro and counter arguments addressed by the learned counsels for the parties and perused the available record as well as additional material including law cases/authorities in support of their respective plea and contentions.

ARGUMENTS.


04. The learned counsel for the appellant at the very outset of addressing his arguments contended that the appellant was appointed as PST through NTS on 25.03.2016 but all of a sudden his appointment order was withdrawn which was communicated to him on 30.09.2016. He was condemned unheard and discriminated as no charge sheet or show cause notice was issued to the appellant. The legality of one sided enquiry to have been conducted and finding the impersonation by one Zeeshan to have appeared in NTS test for the Appellant, is in question. This enquiry has been made the base for withdrawal of the appointment order of the appellant. If at all it is presumed as true case of impersonation then proper legal course should have been adopted i.e registration of FIR against the appellant and person impersonated (Mr. Zeeshan). Moreover, the video record and other related documents including the signature of the appellant on the attendance

ATTESTED

 MEMBER
 Services Tribunal
 Peshawar

register at the time of test must have been in the custody of NTS whereas NTS neither attended the Peshawar High Court nor Services Tribunal. It was vehemently contended that the case is a self-concocted story where the purported photo image has been produced by private respondent No.5 instead of NTS. Learned counsel for the appellant produced and relied on laws and authorities 2015 SCMR 1418, 2008 SCMR 1369, 2010 PLC(CS) 331, 2013 SCMR 752, 1997 SCMR 1073, PLD 2008 Supreme Court 360 and 2013 SCMR 752.

05. Learned counsel for private respondent No.5 argued and based his contention that the appellant is not a civil servant within the meaning and definition under Section-2 of the Khyber Pakhtunkhwa Civil Servants Act, 1973. His one year adhoc service had not completed and even during that period he faced an enquiry of impersonation as a result of which his appointment order was withdrawn. His adhoc service had not been regularized by the provincial government subsequently and as such his Service Appeal is not maintainable. Moreover, he assailed the very signatures of Appellant affixed on various vital documents including that of school attendance register and contended that the same must have been examined and verified through Forensic Laboratory.

06. On the other hand, the learned Deputy District Attorney contradicted the arguments of learned counsel for the appellant on the ground that the appellant does not qualify as Civil Servant in terms of definition of civil servant under Section-2 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 because he was initially appointed as PST (BPS-12) on adhoc basis and whose services have not been regularized subsequently. So, primarily the appeal is not maintainable before the Services Tribunal. He relied on and was in support of the reply /arguments of the learned counsel for private respondent No.5.

ATTESTED

 CHAIRMAN
 Khyber Pakhtunkhwa
 Services Tribunal,
 Peshawar

CONCLUSION.

07. Before coming to conclusion of the case, it is appropriate to mention that the question of maintainability of appeal has been addressed and concluded in para-7 of the judgment of Peshawar High Court, Peshawar dated 26.10.2017:-

“The bare reading of the above definition makes it clear that adhoc employee is also Civil Servant and can competently approach the Provincial Service Tribunal. In view of the bar contained in Article 212 of the Constitution of the Islamic Republic of Pakistan, 1973, this Court cannot entertain this petition. Since the petitioner was pursuing his remedy before this Court bonafidely, therefore, instead of returning or dismissing the petition would send this petition directly to the Provincial Service Tribunal for treating it as Service Appeal and for its decision in accordance with law”.

08. NTS conducted the test for various posts including the post of PST (BPS-12) on 28th and 29th November 2015 was not represented as necessary party neither before the Peshawar High Court, Peshawar nor the Services Tribunal despite the fact it was made necessary party vide order sheet of Peshawar High Court, Peshawar dated 16.01.2017 and Khyber Pakhtunkhwa Services Tribunal order sheet dated 29.11.2018. It is the NTS which has complete record to provide as evidence and proof in the case of impersonation of the appellant. As mentioned by the official respondents at PARA-11 of their reply/comments that District Police Officer, Mardan had been approached to register FIR against 11 persons for impersonation. DEO(M) Mardan (Respondent No.1) wrote a letter to DPO, Mardan on 31.08.2016 for registration of FIR against 11 persons for their alleged impersonation and included the name of the appellant as reflected at serial No. 9 of the list/letter. This letter was written in continuation of earlier letter dated 06.08.2016 and 20.08.2016 by the DEO(M) Mardan. However, no registration of FIR has been entered by the Police Department. The enquiry dated 04.08.2016 conducted in the case and to

ATTESTED


Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

which referred to in the official reply, the appellant has not been associated with to record his statements and clarify his position. So far so that Mr. Zeeshan S/O Mir Wali Rehman who purportedly impersonated for the appellant was found as the "impersonator of the real impersonator" at the time of enquiry as recorded in para-1 under "findings".

09. As a sequel to the above, we have arrived at the conclusion that the opportunity of fair trial has not been afforded to the appellant being his fundamental and inalienable right under Article-4 and 25 of the Constitution. He has been prematurely convicted in the instant case which is against the cannons of law and natural justice. The impugned orders dated 06.08.2016 and 29.09.2016 are therefore set aside with the directions to the respondents to conduct de-novo enquiry to be concluded within three months from receipt of copy of this judgment strictly in accordance with law and rules. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
01.12.2020

SD/

(MIAN MUHAMMAD)
MEMBER(E)

SD/

(HAMID FAROOQ DURRANI)
CHAIRMAN

Certified to be true copy

[Signature]
Sd/-
M. A. HANFAN
MAGISTRATE

Date of Presentation of Application	02/12/2020
Number of Cases	2400
Case Fee	26.00
Cost	26.00
Date of Receipt of Copy	09/12/2020
Date of Copy	09/12/2020

"B"

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

DB

No.

Recd

Appeal No..... 1408 of 2017

..... Khurshid Appellant/Petitioner

Versus

Director E. & S.E. K.P.K. Pesh. Respondent

Respondent No..... 2

Notice to: Distt: Education Officer (Male)
Mardan.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 23/11/2017 at 8:00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 22/11

Day of..... Oct 2020

M. I. J.
 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

DB

No.

Recd

Appeal No. 1408 of 2017

Khurshed Appellant/Petitioner

Versus

Director ERSE KP Pesh Respondent

Respondent No. 3

Notice to:

Director NTS Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 23/11/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 22nd

Day of Oct 2020.

M. W. J.
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

DB

No.

Recd

Appeal No. 1408 of 2017.

Khurshheed Appellant/Petitioner

Versus

Director EGSE Pesh. Respondent

Respondent No. 4

Sub Divisional Education Officer (Male)

Notice to:

Takht Bhai Mardam.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 23/11/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....22nd

Day of.....Oct 20.....

M. Jai
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No. 1408 17

Appeal No. Rhursheed of 20

Appellant/Petitioner

Director E & SE Pesh.

Respondent

Director Elementary & Secondary Education

Respondent No.

Notice to: Peshawar

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

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 22/12

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

Day of.....20

M. J. C.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

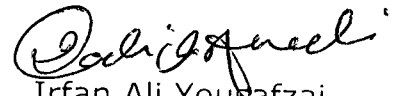
5. *That instant application is well within time and the valuable rights of the appellant are involved besides there is no bar on restoration of titled appeal.*

It is, therefore prayed that, on acceptance of this application, the mentioned appeal may kindly be ordered to be restored.

Dated:- 28/09/2018

Through:-

Appellant


Irfan Ali Yousafzai
Advocate, High Court,
Peshawar.

Affidavit

As per instruction of my client I, Irfan Ali Yousafzai advocate, do hereby solemnly affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable Tribunal.


DEPONENT

①



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. 1408 /2017

Khyber Pakhtunkhwa
Services Tribunal

Diary No. 1442

Dated 19-12-2017

Khursheed S/o Noushad R/o Village Takar, Takht Bhai, Mardan.

... (APPELLANT)

VERSUS

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa.
2. District Education Officer (Male), Mardan.
3. Director NTS, Peshawar.
4. Sub Divisional Education officer (Male), Takht Bhai, Mardan.

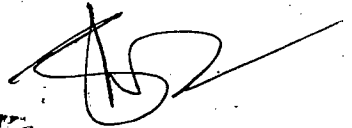
.. RESPONDENTS

APPEAL UNDER SECTION 4 OF THE SERVICES TRIBUNAL ACT 1974, AGAINST THE IMPUGNED ORDER DATED 25/07/2016 WHEREBY THE APPOINTMENT ORDER OF THE APPELLANT WAS WITHDRAWN

Filed to-day
Registrar
19/12/17

Prayer:

ATTESTED



Registrar
Peshawar

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED DISMISSAL ORDER DATED 25/07/2016 OF RESPONDENTS BE SET ASIDE AND THE APPELLANT BE ALLOWED TO CONTINUE ON WITH HIS SERVICES WITH ALL BACK BENEFITS

Submitted to-day
Registrar

Registrar
26/12/17

Appeal No. 1408/2017
Khursheed vs Govt

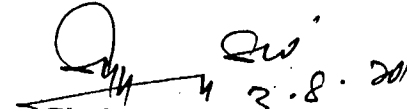
03.08.2018

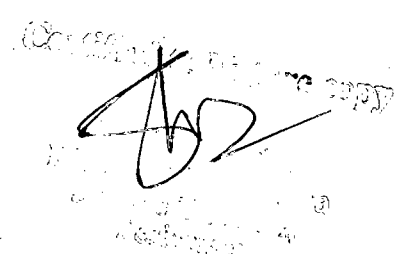
Neither the appellant nor his counsel present.


On one hand, on 26.02.2018, the appellant was directed to deposit security and process fee within 7 days but he did not comply with order of this Tribunal and on the other hand on 16.04.2018 and then on 02.07.2018 neither the appellant nor his counsel was present nor the security and process fees has been deposited so far. ^{From} On this conduct of the appellant, one thing is clear that he is not interested to pursue the appeal. Today the court time is about to over being Friday.

As such, in the circumstances, this Tribunal is left with no other option but to dismiss the appeal in default. File be consigned to the record room.

Announced:
03.08.2018


Chairman 3.8.2018



Date of Presentation of Appeal	27-9-18
Number of Writs	800
Copying Fee	6
Urgent	2
Total	808
Name of Clerk	
Date of Trial	27-9-18
Date of Delivery	27-9-18