


16th Nov 2022

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today. To come up for arguments on 15.12.2022 before D.B at camp court Abbottabad.



(Salah Ud Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

19th Sept 2022 Appellant in person present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Saleem Khan, SO for respondents present.

Representative of the respondents submitted written reply which is placed on file. To come up for arguments on 16.11.2022 before D.B at camp court Abbottabad.

Q

16 Nov 2022

Appellant in person present (Kavim Asif Makrom) (J)
(Shah, Deputy District Attorney for resp. Chairman
Camp Court Abbottabad)

Appellant requested for adjournment on the ground
that his counsel is not available today. To come up for
arguments on 15.12.2022 before D.B at camp court
Abbottabad.

(Shah, Deputy District Attorney for resp. Chairman
Camp Court Abbottabad)

(Kavim Asif Makrom) (J)
Chairman
Camp Court Abbottabad

18.11.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for written reply/comments on 14.02.2022 before S.B at Camp Court, Abbottabad.

Appellant deposited
Security & Process Fee

(Rozina Rehman)
Member (J)
Camp Court, A/Abad

14-2-2022 :-

Due to retirement of worthy
chairman case is adjourned to
18-7-2022 at camp court, Abbottabad.

l
Rendu.

18th July 2022 Appellant alongwith his counsel for the appellant present. Syed Naseer Ud Din Shah, Asst: AG alongwith Mr. Hamid Mansoor, Assistant for respondents present.

Written reply/comments not submitted. Representative of the respondents seeks time to submit the same. Last opportunity granted. To come up for written reply/comments on 19.09.2022 before S.B at camp court Abbottabad.

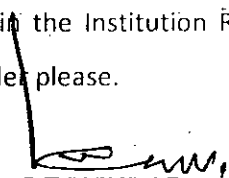


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 11882 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/10/2020	<p>The appeal of Syed Muhammad Zaffar Shah resubmitted today, by Mr. Ikramul Qayyum Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>22.01.2021</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>Due to covid 19, case is adjourned to 24-9-21 for the same</i></p> <p style="text-align: right;"><i>Reader</i></p>
2-	22-1-2021	<p>24.09.2021</p> <p>Nemo for the appellant.</p> <p>Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S,B on 18.11.2021 at Camp Court Abbottabad.</p> <p style="text-align: right;"> (SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT ABBOTTABAD</p>

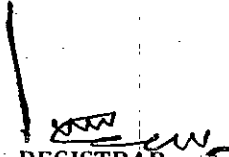
The appeal of Syed Mohammad Zafar Shah son of Syed Shah Zaman Shah received to-day i.e. on 19.09.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Copy of termination order dated 26.06.1997 is not attached with the appeal which may be placed on it.
2. Annexures B and E are illegible which may be place legible/better one.
3. Copy of reply to final show cause notice is not attached which may be replaced on it.
4. Copy of report is not attached with the appeal which may be placed on it.

No. 2742 /S.T,

Dt. 21/09 /2020

Mr. Ikram Ul Qayyum Adv.
High Court, Mansehra.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA PESHAWAR

Syed Muhammad Zafar Shah..... Appellant

Versus

Secretary, Elementary and Secondary Education Department
Peshawar etc..... Respondents

APPEAL

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Dated 25-06-2020

Syed Muhammad Zafar Shah
(Appellant)

Through:

Ikram-ul-Qayyum
Advocate High Court
Mansehra
IKRAM-UL-QAYYUM
&

BABAR ILYAS
Advocates High Court
District Courts Mansehra

①

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA PESHAWAR

Service appeal No. 11882 of 2020

Syed Muhammad Zaffar Shah son of Syed Shah Zaman Shah
r/o village Chountian P/O Paras, Tehsil Balakot District
Mansehra, Ex PST GPS Ghory Phair Mansehra
.....Appellant

Khyber Pakhtunkhwa
Service Tribunal

Versus

Diary No. 10478

Dated 18/9/2020

- 1) Secretary, Elementary and Secondary Education
Department Peshawar
- 2) Director, Elementary and Secondary Education
Department Peshawar.
- 3) District Education Officer (Male)
Mansehra..... Respondents

APPEAL UNDER SECTION 4 OF KPK SERVICE
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
NOTIFICATION NO 17761-66 DATED--09-11-2019
WHEREBY RESPONDENT NO 03 HAS WITHDRAWN
THE APPOINTMENT NOTIFICATION OF THE
APPELLANT VIDE ENDST NO 10239-46 DATED
20.06.2019 AND AGAINST NOT TAKING ANY ACTION
ON THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITHIN STATUTORY PERIOD OF NINTY
(90).DAYS.

PRAYER:-

Filed to-day

Registrar
18/9/2020

On acceptance of the appeal, the impugned
NOTIFICATION NO. 17761-66 Dated 09-11-2019 may
graciously be set-aside being illegal, void, without
Lawful authority, of having no legal effect and
factually erroneous and appellant be reinstated into
service as PST with all back benefits and other
admissible allowances as per law on the subject and
any other order as may deem fit and appropriate in
the fact and circumstances of the case.

Respectfully Sheweth:-

- 1) That, initially, appellant was appointed against
vacant post of PST at GMPS Tangri, Mansehra

vide appointment Order Endst: No.124-30 Dated 01.01.1996 by Competent Authority.

(Copy of appointment order dated 01.01.1996 is annexed as annexure "A").

- 2) That, appellant performed his duties and continued his services, unfortunately the service of appellant was terminated on grounds of irregular appointment vide termination order No.1678-1713 dated 26-06-1997 by Competent authority

(Copy of termination order dated 26-06-1997 is annexed as annexure "B").

- 3) That, the Government of Khyber Pakhtun Khawa, enacted the Khyber Pakhtukhawa Sacked Employees (Appointment) Act, 2012, for reinstatement of Sacked Employees whose terminated during 1996-98, where under, appellant applied for his reinstatement/ appointment through an application in year 2012, whereupon Respondent No. 03 regretted to reinstate/ appoint the appellant on the ground of having not possessing the prescribed professional qualification at the initial period, despite the facts that number of similar placed Sacked Employees were re instated into government service by competent Authority.

- 4) That, the appellant filed Writ Petition No. 82-A of 2018 before Hon'ble Peshawar High Court Abbottabad bench against the non issuing of appointment order of appellant as Sacked Employees, during the pending adjudication of Writ Petition, appellant was re instated/appointed, into Government Service after checking/scrutiny of application and relevant record of the appellant in office concerned and on the recommendation of Departmental Selection Committee, by the

respondent No.3 vide appointment Notification Endst: No.10239-46 dated 20-06-2019 and posted as PST at GPS Baila Paras (Mansehra) against vacant post.

(Copy of appointment order vide dated 20-06-2019 IS annexed as annexure "C").

- 5) That, in compliance of appointment order dated 20-06-2019, the appellant took over the charge of the post by submitting arrival report and charge report vide dated 22-06-2019 at GPS Baila Paras Mansehra and is devotedly serving with his utmost endeavour and to the best of his ability from the date of his appointment.

(Copies Charge Report vides dated 22-06-2019 and other relevant documents are annexed as annexure "D").

- 6) That, all of a sudden, and to the utter surprise of the appellant, Respondent No. 03 served a Show Cause Notice upon the appellant in which he was required to explain his position in respect of alleged submission of fake document/service record and no record where found in initially appointed school vide PST at GMPS Tangri, Mansehra to which appellant replied and denied the baseless, after thought and unfounded allegation mentioned in the Show Cause Notice.

(Copy of Show Cause Notice is annexed as annexure "E")

- 7) That, Respondent no 03 in the ibid Show cause notice was pleased to dispense with the conduct of formal/regular inquiry without any reason which shows mala-fide on the part of Respondent No 03.
- 8) That, without having proved the allegations levelled in the Show Cause Notice, the appointment order of the appellant vide appointment dated 20.06.2019 was withdrawn with immediate effect through a mechanical

impugned Notification Endst: No. 17761-66 dated 09-11-2019, by Respondent No. 03.

(Copy of impugned Notification dated 09.11.2019 is annexed as annexure "F").

9) That, appellant filed a departmental appeal against impugned Notification vide dated 09.11.2019, before appellate authority (Respondent No.02) on 06.12.2019 and waited for 90 days but no reply has been received by the respondent to the appellant so far.

(Copies of departmental appeal dated 09.11.2019 is annexed as annexure "G").

That, felling aggrieved from the impugned Notification dated 09.11.2019 passed by Respondent No. 03, appellant having no other remedy except to file the present appeal before this worthy Tribunal for interference inter alia on the following amongst other grounds.

GROUND:

- A) That, admittedly, appellant was initially, appointed against the vacant post of PST on dated 01.01.1996 and till 26-06-1997, he performed his duties and kept on receiving his salary/ pay. Whereas the impugned Notification vide dated 09.11.2019 of withdrawn of appointment order is perverse, discriminatory, malafide, against the law and liable to be set aside.
- B) That, the services of the appellant were terminated on the ground of irregular appointment in the year 1997, and appellant applied for his appointments in the view of KPK Sacked Employees Act, 2012, respondent No 03 was appointed in due course and after inquiry by concerned quarter and furthermore scrutiny of the service record of the appellant wherein no deficiency

in respect of the case of the appellant was found and he was declared "OK"

- C) That the meeting of District Selection Committee was held on 11-06-2019 under the Chairmanship of Respondent No. 3 for determining the eligibility and suitability for appointment of Sacked Employee, wherein the appellant was recommended for appointment as PST being eligible and suitable for appointment, after observing all codal formalities the withdrawal of appointment order appellant is against the law, rules and malafide on the part of respondents and against the natural justice.

(Copy of minutes of meeting of DSC is annexed as Annexure "H")

- D) That, admittedly, appellant being Sacked Employee was appointed by respondent No. 3 after checking/Scrutiny of all relevant document as per record in office concerned and on recommendation of Departmental Selection Committee and also as per Judgment of, Hon'ble Peshawar High Abbottabad Bench, issuing of impugned Notification vide dated 09.11.2019 is baseless, unlawful unconstitutional, based on malafide by ignoring the facts and relevant records, without statement of allegation, over riding the rules, on the basis on report, which is although and favour of applicant wherein the SDEO Balakot, Mansehra through telephonically and written verification letter wherein the Headmaster stated that "no such record was found of the sack person in our official record of GMPS Tangri for the period of 1996-97". Which is no legal and justified reason on the basis of which the appointment order of appellant was withdrawn which is illegal and is liable to be struck down.

(Copy of report and other relevant record are annexed as Annexure "T")

- E) That, the impugned notification vide dated 09.11.2019 against the law, rules, and also against the judgment of Hon'ble high court, that the appellant was appointed in due course and after adopting all codal formalities and after inquiry by concerned equator and on the recommendation of DSC and scrutiny of documents in office concerned by Scrutiny committee, thereafter, the appointment order vide dated 20-06-2019 was issued by respondent No.3.
- F) That, there is no cavil to the service legal proposition that regular inquiry must be held in denied and disputed question of fact, but department (respondent No.3) with malafide intention dispensed with holding of regular inquiry into the present case, and also malafide statement of Head Master due to which the impugned notification dated 09.11.2019 is not legally sustainable.
- G) That, the appellant was never provided an opportunity to rebut the allegation levelled against him in the show cause notice nor he was confronted with any evidence in respect of fakeness of earlier appointment and termination orders nor appellant was provided in opportunity of personal hearing, hence the impugned notification vide dated 09.11.2019 is inherently flawed and legally unsustainable.
- H) That, the fresh appointment order of appellant dated 09.11.2019, would reveal that it was issued on the recommendation of DSC and after though and in-depth scrutiny of entire record of appellant, and no deficiency of whatsoever kind and nature was found by the scrutiny committee in the case of appellant.
- I) That no regular inquiry was held in the alleged allegation as mentioned in impugned notification

dated 09.11.2019, hence the allegation setup by respondent has only remained the allegation and it has not been proved at all.

- J) That, neither any statement of allegation was prepared nor charge sheet was issued to the appellant and he was condemned Un heard.
- K) That, no proper and lawful procedure was adopted by respondent, only appointment order was withdrawn on the bases of fake report of Head Master after though and fabricated manner hence the impugned notification in not sustainable.
- L) That, respondent/authorities were biased against the appellant and they wilfully and with malafide intention did not associate the appellant with any procedure.
- M) That, the alleged allegation of the respondent to the effect that the appointment order and termination orders are not available in previous school, where the appellant was initially appointed and not found in record of school concerned as per report of Head Master, are seem to be after though and fabricated by respondent just to deprive the appellant of his vested right.
- N) That, the entire scheme of service law does not recognize the expression '*WITHDRAWN*' of appointment order, hence, respondent No.3 himself fabricated the allegation against the appellant of having fake record or not found in previous school, though self coined terminology of withdrawn of appellant appointment order, which had been issued in compliance of the judgment of Hon'ble Peshawar High Court Abbottabad bench, vide judgments dated 24-05-2016, 27-03-2018, 07,03-2019, in Writ Petition No.516-A of 2013, 676-A of 2015, 20-A of 2014, 216-A

of 2015, 1155-A of 2015, 702-A of 2014, 115-A of 2014 and 944-A of 2019.

- O) That, facts and circumstance of the case suggest that appellant has been made a scapegoat by respondent No.3 for ulterior motive and with malafide.
- P) That, whatever angle, the legality and propriety of the impugned notification is analyze, it is liable to be declared void, patently illegal, unlawful, without jurisdiction and of having no legal effect without second thought.
- Q) That, in fact the entire proceeding and action against the appellant were wrong, illegal against the rules and regulation and hence void-ab-intio.
- R) That, this fact may not be left to fade in oblivion that withdrawal of appointment order of appellant is arbitrary, one sided and ex-parte therefore, notification has no legal sanctity and is nullity in the eye of law
- S) That, there is no other efficacious and prompt remedy available to the appellant except the invocation of jurisdiction of this Hon'ble Tribunal.
- T) That, appellant seeks the permission of this Hon'ble Court to agitate any other grounds available at the time of arguments

PRAYER:-

In view of the above circumstances and facts it is therefore, most humbly prayed and requested that on acceptance of the appeal, the impugned NOTIFICATION NO. 17761-66 dated 09.11.2019 may graciously be set-aside being illegal, void, without Lawful authority, of having no legal effect and factually erroneous and appellant be reinstated into service as Post of PST with all back benefits and other admissible allowances as per law on the subject and

any other order as may deem fit and appropriate in the fact and circumstances of the case.

Dated 25.08.2020

Zafar
Syed Muhammad Zafar Shah
(Appellant)

Through:

Ikram Ullah Qayyum
Advocate High Court
Mansehra
IKRAM ULLAH QAYYUM
&

Babar Ilyas
BABAR ILYAS
Advocate High Court
District Courts Mansehra

(10)

VERIFICATION:

SYED MUHAMMAD ZAFAR SHAH SON OF
SYED SHAH ZAMAN SHAH R/O VILLAGE
CHOUNTIAN P/O PARAS, TEHSIL
BALAKOT DISTRICT MANSEHRA, EX PST
GPS GHORY PHAIR MANSEHRA DO
HEREBY VERIFY THAT THE CONTENTS OF
FORE-GOING APPEAL ARE TRUE AND
CORRECT TO THE BEST OF MY
KNOWLEDGE AND BELIEF AND NOTHING
HAS BEEN CONCEALED OR SUPPRESSED
FORM THIS HON"BLE TRIBUNAL.

Syafar Shah
SYED MUHAMMAD ZAFAR SHAH
(DEPONENT)

(11)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA PESHAWAR

Syed Muhammad Zafar Shah.....Appellant

Versus

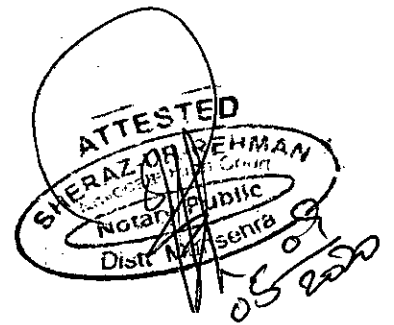
Secretary, Elementary and Secondary Education Department
Peshawar etc.....Respondents

APPEAL

AFFIDAVIT

SYED MUHAMMAD ZAFAR SHAH SON OF SYED
SHAH ZAMAN SHAH R/O VILLAGE CHOONTIAN P/O
PARAS, TEHSIL BALAKOT DISTRICT MANSEHRA, EX
PST GPS GHORY PHAIR MANSEHRA. DO HERBY
SOLEMNLY AFFIRM AND DECLARE ON OATH THAT
THE NO SUCH SUBJECT MATTER APPEAL HAS EVER
BEEN FILED BEFORE THIS HONORABLE COURT NOR
PENDING NOR DECIDED. THAT THE CONTENTS OF
FOREGOING AFFIDAVIT ARE TRUE AND CORRECT
TO THE BEST OF MY KNOWLEDGE AND BELIEF AND
NOTHING HAS BEEN CONCEALED OR SUPPRESSED
FROM THIS HONOURABLE TRIBUNAL.

Syed Muhammad Zafar Shah
SYED MUHAMMAD ZAFAR SHAH
DEPONENT



(12)

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHYBER PESHAWAR**

Syed Muhammad Zafar Shah..... Appellant

Versus

Secretary, Elementary and Secondary Education Department
Peshawar etc..... Respondents

CORRECT ADDRESSES OF THE PARTIES

Respectfully sheweth!

Correct addresses of the parties are as under: -

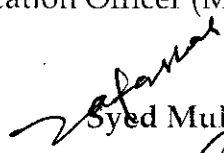
APPELLANT

Syed Muhammad Zaffar Shah son of Syed Shah Zaman Shah
r/o village Chountian P/O Paras, Tehsil Balakot District
Mansehra, Ex PST GPS Ghory Phair Mansehra.


RESPONDENTS


- 1) Secretary, Elementary and Secondary Education
Department Peshawar
- 2) Director, Elementary and Secondary Education
Department Peshawar.
- 3) District Education Officer (Male) Mansehra

Dated 25-08-2020


Syed Muhammad Zafar Shah
(Appellant)

Through:


IKRAM UL QAYYUM
&


BABAR ILYAS
Advocates High Court
District Courts Mansehra

(13)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA PESHAWAR

Syed Muhammad Zafar Shah.....Appellant

Versus

Secretary, Elementary and Secondary Education Department
Peshawar etc.....Respondents

APPLICATION FOR CONDOLATION OF DELAY

Respectfully Sheweth,

1. That the above title appeal is being file in this honour able court, for redress of aggrievance of appellant.
2. That delay in filing of accompanied in appeal in occasion due to the pandemic COVID-19 wherein the appellant is not submitted appeal within a time.
3. That, the huge interest of appellant is involved with the appeal.
4. That, if delay occur has not been condone than the applicant would suffer an irreparable loss.
5. It is therefore humbly prayed that in the light of above submission the delay infilling of accompanied appeal may kindly be condone in the interest of justice.

Dated 25-06-2020

Syed Muhammad Zafar Shah

Syed Muhammad Zafar Shah
Deponent

Through:

Ikrām-ul-Qayyum
Advocate High Court
Mansehra
IKRAM UL QAYYUM
&

Fabar Ilyas
Advocate High Court
District Courts Mansehra

14

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA PESHAWAR

Syed Muhammad Zafar Shah.....Appellant

Versus

Secretary, Elementary and Secondary Education Department
Peshawar etc.....Respondents

APPEAL

AFFIDAVIT

I SYED MUHAMMAD ZAFAR SHAH SON OF SYED SHAHZAMAN SHAH R/O MOHALLAH CHONTAIN VILLAGE PARAS TEHSIL BALAKOT DISTRICT MANSEHRA, EX PST GPS BAILA PARAS MANSEHRA DO HERBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT THE NO SUCH SUBJECT MATTER APPEAL HAS EVER BEEN FILED BEFORE THIS HONORABLE COURT NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Zafar Shah

SYED MUHAMMAD ZAFAR SHAH
DEPONENT

ATTESTED
SHERAZ KHAN
Notary Public
Distt. Mansehra
05/09/2020

(15) : Annular

(A)

OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE) PRIMARY, MANSEHRA.

OFFICE ORDER NO. 04

DATED 01/01 /1996.

APPOINTMENTS:

Consequent upon the finalization of the lists of un-trained candidate on need basis duly approved by the Minister for Primary Education, NWFP and endorsed by the Director Primary Education, NWFP, Peshawar Mr. Syed Muhammad Mirzaaffar Shah S/o Syed Sha Zaman is hereby appointed at GP/GMPS Taangri in PP-46 in BPS-7 @ Rs.1480/- fixed per month plus usual allowances as admissible under the rules w.e.f. the date of their taking over charge in the interest of public service.

TERMS & CONDITIONS:

1. They should submit their charge reports to all concerned.
2. Their appointment is purely on temporary basis and liable for termination at any stage without assigning any reason.
3. Their appointment is subject to the verification of their original Academic and Professional Certificates/documents. Their original Academic and Professional Certificates/documents should be checked thoroughly before handing over the charge and should not be handed over charge if their original certificates are not found correct.
4. No one should be handed over charge if he is below 18 years and above 30 years, in case of the candidates relating to Zone III and 27 years of others.
5. Their pay will not be drawn until they produce age and Health certificate from Medical Superintendent DHO Hospital Mansehra.
6. They will be governed under prescribed service rules framed by the Government of NWFP.

Ibrahim Qayyum
Advocate High Court
Mansehra

sale
(MURAMMAD ISHAQ)
DISTRICT EDUCATION OFFICER(MALE)
PRIMARY, MANSEHRA.

Endst: No. 124-30

Dated Mansehra the 01/01 /1996.

Copy forwarded to the:-

1. Secretary to Government of NWFP, Education Department, Peshawar.
2. Director, Primary Education, NWFP, Peshawar.
3. District Accounts Officer, Mansehra.
4. Sub Divisional Education Officer(Male), Mansehra.
5. Candidate concerned.
6. Superintendent Local Office.

Ibrahim Qayyum
DISTRICT EDUCATION OFFICER(MALE)
PRIMARY, MANSEHRA.

(B)

(A)

(For use in Police Department only)

Heirs:-

1. Passed SSC Examination from BISE Abbottabad
Under Roll No. 13788 A/1992 Marks obtained 535/850.

[Signature]
Manshra

Verification Roll No. dated received back.

~~Passed BA Examination from BISE Abbottabad
under Roll No. 21166 A/1999. Marks obtained 535/850.~~

Left Thumb-Impression

[Signature]
S.D.O (M)
Manshra

Qualifications	Date	Qualifications	Date
English		First Arts	
Pushto		B.L. or B.A.	
Urdu		Pleadership examination	
Plan-Drawing		Training School Final Examination	
Finger Print		Other Qualifications:-	
Drill Instructing			
Court Duties			
Reserve Duties			

[Signature]
Advocate High Court
Manshra

N.B. - Line to be drawn under the qualification possessed.

9.
10.

Note:- The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: Syed Muhammad Muzaffar Shah

2. Race Syed

3. Residence village chontian Paras Teh: Baloch
Distt: Manshehra

4. Father's name and residence Syed Shahzaman Shah

5. Date of birth by Christian era as nearly as can be ascertained 15-02-1976
Fifteen February 1976 N.H. Security Sindh

6. Exact height by measurement 5-6

7. Personal marks for identification NIL

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government Servant

S.M. Shah

Muhammad Qayyum
Advocate High Court
Manshehra

10. Signature and Designation of the Head of the Office, or other attesting Officer.

S.P.O (M)
Manshehra

Muhammad Qayyum
Advocate High Court
Manshehra

10	11	12	13		14	15
			Leave			
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
Period	Government to which debitabale	Signature of the head of the office or other attesting officer	Reference to an recorded punishment or censure, or reward or praise of the Government Serv			
Shah	S.D.E. 500 Mansehra	30-11-96 Filed	File	[Signature]	Appointment as PT vide D.P. 107 Reg. Mansehra	
M. Shah	[Signature] Mansehra				Graded No - 124-30 Detail - 01-01-1996	
					[Signature] S.D.E.O Mansehra	
					Service rendered from 09-01-96 to 30-11-96 with A.C.I. and others record of this Office.	
					[Signature] Mansehra	
					[Signature] Advocate High Court Mansehra	

Consequent upon their selection by the Departmental Selection Committee, the District Education Officer (Male) Primary, Manshra, has been pleased to appoint the following trained candidates at the schools mentioned against their names in the list (1480-S-2695) plus usual allowances as admissible under the rules with immediate effect subject to the existing terms & conditions.

S. No.	NAME OF THE CANDIDATE	D/O	BIRTH NO. OF	SCHOOL	POSTED	REMARKS
1.	Muhammad Saleem S/O Saifullah R/o Bhangan.	15.3.73	03	GIS Asawal		Vice Muhammad Naeem not selected on merit, hence terminated.
2.	Nadayat Ullah S/O Amanullah R/o Batta.	18.12.76	11	GIS Chapra Bala		Vice Ashiq Hussain
3.	Muhammad Hanif S/O Khan Jaz R/o Tarwai.	1.1.75	13	GIS Chatter Plain		Vice Ejaz Hussain Shah
4.	Saqib Farvez S/O Muhammad Farvez R/o Manshra.	21.11.76	10	GIS Chatter Plain		Vice Dagh Khan
5.	Muhammad Riaz Abbasi S/O Shah Nawaz R/o Kanshan.	13.6.77	14	GIS Dhamberi		Vice Zulfiqar Ali Shah
6.	Muhammad Farvez S/O Mir. Zaman R/o Josacha.	4.10.72	16	GIS Kandla		Vice Muhammad Fiaz
7.	Abdul Malik S/O R/o Banda Gesach.	1.1.77	17	GIS Bela Ziarat		Vice Javed Hussain Shah
8.	Muhammad Munsif S/O Muhammad Wali R/o Kanshan.	10.9.74	18	GIS Jala Bai Pain		Vice Abdul Ghafoor Shah
9.	Tufail Muhammad S/O Faisalur Rehman R/o Batta.	7.3.75	19	GIS Kahan		Vice Sajjad Hussain Shah
10.	Dashir Ahmad S/O Gul Zaman R/o Kanshan.	2.5.77	22	GIS Janda Thalyan		Vice Abdul Qayyum
11.	Sajjad Ahmad S/O Akbar Khan R/o Shahdore.	5.9.74	23	GIS (Chota Bala)		Vice Ghulam Nabbi
12.	Malik Mohd Sajjad S/O Safiullah R/o Kanshan.	30.8.75	24	GIS (Malla Juhar)		Vice Ghulam Nabbi
13.	Akhtar Zeb S/O Aurangzeb R/o Sajna.	15.3.74	26	GIS (Rudra)		Vice Muhammad Naved
14.	Naseer Ali Shah S/O S. Chan Mohd Shah R/o Mohayan Khari.	19.6.75	25	GIS Tareda		Vice Rustam
15.	Fazal Haq S/O Abdus Sattar R/o Saffa.	2.5.72	36	GIS Hassan Zie		Vice Abdul Razaq
16.	S. Raza Ali Shah S/O Muzhtar Shah R/o Bairan.	29.6.76	37	GIS Tangri		Vice Syed Muhammad Zaffar Shah

Continued Page No. 2.

(Handwritten signatures and notes in Urdu/Hindi script)

A.S.D. (A.T.)
Circle Dholpur
(Manshra)

Ikram-ul-Qayyum
Advocate High Court
Manshra

Muhammad Ashraf
SST(G) Eps 46 (MA) (S) (S)
GIS Shikhan (Manshra)

20

1.	Hussain Shah S/O 20.4.78	10	G.S. Tareda	Vice Gulam not selected on merit, hence terminated.
2.	Shah S/O			
3.	Muhammad S/O 1.1.76	12	G.S. Mohr	Vice Javed Talab
4.	Muhammad K/O			
5.	Mustafiz S/O Gohar Aman 1.5.75	14	G.S. Jela Jabbar	Vice Gulam Hassan
6.	K/O Jagori			
7.	Nazakat Ali S/O 7.4.76	16	G.M.S. Kalsan	Vice Kaiser Iqbal
8.	Abdul Qayyum K/O			
9.	Saida Gessah			
10.	Muhammad Yusuf S/O 10.1.72	17	G.M.S. Devel	Vice Muhammad Hamid
11.	Abul Hasan K/O			
12.	Khahhal			
13.	Faheem Anwar S/O 1.4.78	18	G.S. Saldhar No.2	Vice Muhammad Zabeer
14.	Anwar Rashid S/O			
15.	Jabbari			
16.	Muhammad Ghayyur S/O 1.1.77	20	G.S. Dana Sarbhand	Vice Muhammad Liaqat
17.	Manzoor Samad K/O			
18.	Saida			
19.	Muhammad Kaleem S/O 13.4.76	22	G.S. Batti Arborra	Vice Sajad Hussain
20.	Umar Khatab K/O			
21.	Kanog Jabbari			
22.	Siraj Muhammad S/O 1.12.72	24	G.S. Malokran	Vice Muhammad Aslam
23.	Muhammad Esrar K/O			
24.	Talokra			
25.	Fazalur Rahman S/O 18.5.75	23	G.S. Battal	Vice Muhammad Asim
26.	Khan Jee K/O			
27.	Kayan			
28.	Abdul Qayyum S/O 2.4.72	26	G.M.S. Jela Sadat	Vice Naheed Ahmad
29.	Miskeen K/O			
30.	Giar Sachar Intesar			
31.	Muhammad Kamal S/O 3.11.76	28	G.S. Tareda	Vice Akbar Nawaz
32.	Ali Mardan K/O			
33.	Shamdhara			
34.	Muhammad Javed S/O 1.3.74	30	G.M.S. Katha Bela	Vice Muhammad Aslam
35.	Sharab Khan K/O			
36.	Chela Sala			
37.	Muhammad Taufiq S/O 28.4.74	31	G.S. Tengri	Vice Gulam Rabani
38.	Mushtaq Ahmad K/O Jaida			
39.	Shahid Hussain Shah S/O 6.6.68	32	G.M.S. Lang	Vice Jahangir
40.	S. Maqbool Shah K/O			
41.	Dambori			
42.	Muhammad Khan S/O			
43.	Shah Jehan S/O Ghulam Jan 26.6.72	35	G.S. Hassa	Vice Muhammad Sulaman
44.	K/O Khahal Jala			
45.	Naseer Khan S/O 15.3.73	36	G.S. Batti	Vice Muhammad Tanveer Khan
46.	Noor Zaman S/O			
47.	Khahhal Tain			

CONSTITUENCY No. 17

P-42.

34.	M Arshid Mahmood S/O 20.3.71	05	G.S. Mahawalian	Vice Anwar Zeb not selected on merit, hence terminated.
	Muhammad Yunis K/O			
	Mansehra.			

CONSTITUENCY No. 18

P-43.

35.	Abdul Latif S/O 23.4.75	10	G.S. Kund	Vice Muhammad Kamal not selected on merit, hence terminated.
	Muhammad Hussain K/O			
	Chansal.			

Continued Page No. 3.

A. S. D. Khan
 Circle Dhadial
 (Mansehra)

M. Iqbal
 Advocate
 High Court
 Mansehra

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CONDITIONS

- They will be governed by such rules and regulations as may be prescribed by the Govt. from time to time for the benefit of the Govt. servant to which they belong. Their services will be liable to termination on either side with notice from either side. In case of resignation without notice, one month pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this notification.
 4. Their inter-seniority will be determined in accordance with the merit of the departmental selection committee.
 5. Charge reports should be submitted to all concerned.
 6. They will be on probation for a period of two years and will have to pass the departmental examination. In case a candidate fails to qualify the departmental examination, he will be given one more chance. If he fails again, then his services will be terminated. On arrival/availability of trained teachers, the services of untrained teachers occupying the posts shall be terminated.
 7. Their original certificates/degrees should be checked and verified from the concerned university/ISSA/IDU and Islamic Madrassas before handing over the charge.
 8. Service books of the teachers must be prepared complete in all respect before handing over the charge.
 9. The declaration of assets should be obtained from them immediately and placed on record.
 10. They are required to produce health & eye certificates from medical authorities concerned before handing over the charge.
 11. Charge reports should be submitted to all concerned & charge should not be given to overage candidates until their cases for age relaxation be sent to the concerned quarters.
 12. Efforts should be made for transfer before the completion the tenure will dis-qualify him from service.
 13. No. TA/DF is allowed.
 14. An under taking shall be obtain from Master & degree holders etc that they will serve the department for at least five years while they are selected by the public service commission for any post.
 15. In case of person appointed as an untrained teacher, he will have to pass the requisite training examination within a period of four years failing which his services will be terminated.

NOTE:- Complete information of appointees in consolidated lists on the prescribed proforma (attached) alongwith charge reports be submitted by the lower offices to the Director Primary Education/D.E.O. (M) Primary Manshehra within a week positively.

[Signature]
 (MALE) D.E.O. (M) PRIMARY MANSHEHRA
 DISTRICT EDUCATION OFFICER
 (MALE) PRIMARY MANSHEHRA.

Endst: No. 11679-1713 /G.B/G-I/1997. Dated Manshehra the 26.6. /1997

Copy forwarded for information to the:-

1. Director Primary Education N.T. Peshawar.
2. Sub Divisional Education Officer (Male) Manshehra.
3. District Account Officer Manshehra.
4. All the candidates concerned.
5. Office order File.

[Signature]
 DISTRICT EDUCATION OFFICER
 (MALE) PRIMARY MANSHEHRA.

[Signature]
 A.S.D.E.O. (M)
 Circle Dhodial
 (Manshehra)

[Signature]
 Advocate High Court
 Manshehra

[Signature]
 Muhammad Ashraf
 SST(G) Bps 16 (MA No.0)
 GHS Shinkiani (Manshehra)

(S) (A) (R)

VERIFICATION

Consequent upon their selection by the Departmental Selection Committee the District Education Officer (Male) Primary Mansehra has been please this appoint the following trained candidate at the school posted against their name in BPS-7 () plus usual allowances as admissible under the rules with immediate effect subject be the existing terms & conditions. :-

S#	NAME AND FATHER NAME		
1	Muhammad saleem S/O Saifullah R/O Jhangian	GPS Ashwal	Vice Muhammad Naem
2	Hadayat Ullah S/O Amanullah	GPS Chapra Baila	Vice Ashiq Hussain
3	Muhammad Hanif S/O Khan Baz R/O Tarwai	GPS Chattar Plain	Vice Ijaz Hussain Shah
4	Saqib Parvez S/O Muhammad Parvez R/O Mansehra	GPS Chatter Plain	Vice Dasht Khan
5	Muhammad Riaz Abbasi S/O Shah Nawaz R/O Kanshian	GPS Dhamban	Vice Zulfiqar ali shah
6	Muhammad Parvez S/O Mir Zaman R/O Josachan	GPS Kandla	Vice Muhammad Fiaz
7	Abdul Malik S/O Khaqan R/O Banda Gesach.	GPS Bela Ziarat	Vice Javed Hussain Shah
8	Muhammad Munsif S/O Muhammad Wali R/O Kanshian.	GPS Bela Bai Pain	Vice Abdul Chafoor Shah
9	Tufail Muhammad S/O Fazalur Rehman R/O Battal, Mansehra	GPS Khann	Vice Sajjad Hussain Shah
10	Bashir Ahmed S/O Gula Zaman R/O Kanshian.	GPS Banda Thalayan	Abdul Qayyum
11	Sajjad Ahmed R/O Akbar Khan R/O Shadore	PS Chota baila	Vice Ghulaam Nabbi
12	Malik Mohammad Sajjad S/O Saifullah R/O Kanshian	GPS Pudra	Vice Muhammad Naveed
13	Akhtar Zeb S/O Aurangzeb R/O Bajna.	GPS Tareda	Vice Rustam
14	Naseer Ali shah S/O Syed Chan Muhammad Shah	GPS Hassan Zie	Vice Abdul Razaq
15	Fazal Haq S/O Abdus Sattar R/O Baffa.	GPS Tangri	Vice Syed Muhammad Zaffar Shah
16	Syed Hamza Ali Shah S/O Mukhtar Shah R/O Pairan	GPS Tangri	Vice Syed Muhammad Zaffar Shah
17	Munir Hussain S/O Ameer Shah	GPS Tareda	Vice Guldad
18	Tufail Khan S/O Taj Muhammad R/O Baffa	GPS Mohri	Javede Iqbal
19	Bostan S/O Ghulam Muhammad R/O Jabri	GPS Bela Jabbar	Vice Ghulam Hassan
20	Rafique Ali S/O Abdul Qayyum	GMPS Kalsan	Vice Qaiser Rauf
21	Muhammad Yousaf S/O Abdul Hanan	GMPS Devel	Vice Muhammad Hamid
22	Faheem Anwar S/O Anwar Rasheed R/O Jabbori	G.P.S saldhar No. 2	Vice Muhammad Zaheer
23	Muhammad Ghayyur S/O Manzooru Samad R/O Baida	GPS Dana Sarbiand	Vice Muhammad Liaqat
24	Muhammad Kaleem S/O Umar Khitab R/O Jabbori	GPS Batti Arbora	Vice Sajjad Hussain
25	Siraj Muhammad S/O Muhammad Israr R/O Malookra	GPS Malokra	Vice Muhammad Aslam
26	Fazlur Rehman S/O Khan Jee R/O Kayan	GPS Battal	Vice Muhammad Qasim
27	SAbdulQayyum S/O Miskeen R/O Giar Sacha	GMPS Bela Badat	Vice Naheed Ahmed
28	Muhammad Israr S/O Ali Mardan R/O Shamdhara	GPS Tareda	Vice Akbar Nawaz
29	Muhammad Javed S/O Sharab Khan R/O Chela Bala	GMPS Katha Bala	Vice Muhammad Aslam
30	Muhammad Tariq S/O Mushtaq Ahmed R/O Jaida	GPS Tangri	Vice Ghulam Rabbani
31	Shahid Hussain Shah S/O Syed Maqbool Shah R/O Dambori	GMPS Lang	Vice Jahangir
32	Shah Jehan S/O Ghulam Jan R/O Khabal Bala	GPS Hassa	Muhammad Sulaman
33	Naseeb Khan S/O Noor Zaman R/O Khabal Pain	GPS Batti	Muhammad Tanveer Khan

CONSTITUENCY MERIT

34	Arshad mehmoood S/O Muhammad Younis R/O Mansehra	GPS Malivalian	Vice Aurangzeb ptc selected On merit, hence terminate
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CONSTITUENCY MERIT

35.	Abdul Latif S/O Muhammad Hussain R/O Ghanool	GPS Kund	Vice Muhammad Akmal Selected on merit hence terminated
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BETTER COPY

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VERIFICATION

Consequent upon their selection by the Departmental Selection Committee the District Education Officer (Male) Primary Mansehra has been please this appoint the following trained candidate at the school posted against their name in BPS-7 () plus usual allowances as admissible under the rules with immediate effect subject be the existing terms & conditions. :-

S#	NAME AND FATHER NAME		
1	Muhammad saleem S/O Saifullah R/O Jhangian	GPS Ashwal	Vice Muhammad Naeem
2	Hadayat Ullah S/O Amanullah	GPS Chapra Baila	Vice Ashiq Hussain
3	Muhammad Hanif S/O Khan Baz R/O Tarwai	GPS Chattar Plain	Vice Ijaz Hussain Shah
4	Saqib Parvez S/O Muhammad Parvez R/O Mansehra	GPS Chatter Plain	Vice Dasht Khan
5	Muhammad Riaz Abbasi S/O Shah Nawaz R/O Kanshian	GPS Dhamban	Vice Zulfiqar ali shah
6	Muhammad Parvez S/O Mir Zaman R/O Josachan	GPS Kandla	Vice Muhammad Fiaz
7	Abdul Malik S/O Khaqan R/O Banda Gesach.	GPS Bela Ziarat	Vice Javed Hussain Shah
8	Muhammad Munsif S/O Muhammad Wali R/O Kanshian.	GPS Bela Bai Rain	Vice Abdul Ghafoor Shah
9	Tufail Muhammad S/O Fazalur Rehman R/O Battal, Mansehra	GPS Khann	Vise Sajjad Hussain Shah
10	Bashir Ahmed S/O Gula Zaman R/O Kanshian.	GPS Banda Thalyan	Abdul Qayyum
11	Sajjad Ahmed R/O Akbar Khan R/O Shadore	PS Chota baila	Vice Ghulaam Nabbi
12	Malik Mohammad Sajjad S/O Saifullah R/O Kanshian	GPS Pudra	Vice Muhammad Naveed
13	Akhtar Zeb S/O Aurangzeb R/O Bajna.	GPS Tareda	Vice Rustam
14	Naseer Ali shah S/O Syed Chan Muhammad Shah	GPS Hassan Zie	Vice Abdul Razaq
✓ 15	Fazal Haq S/O Abdus Sattar R/O Baffa.	GPS Tangri	✓ Vice Syed Muhammad Zaffar Shah
16	Syed Hamza Ali Shah S/O Mukhtar Shah R/O Pairan	GPS Tangri	Vice Syed Muhammad Zaffar Shah
17	Munir Hussain S/O Ameer Shah	GPS Tareda	Vice Guldad
18	Tufail Khan S/O Taj Muhammad R/O Baffa	GPS Mohri	Javede Iqbal
19	Bostan S/O Ghulam Muhammad R/O Jabri	GPS Bela Jabbar	Vice Ghulam Hassan
20	Rafique Ali S/O Abdul Qayyum	GMPS Kalsan	Vice Qaiser Rauf
21	Muhammd Yousaf S/O Abdul Hanan	GMPS Devel	Vice Muhammad Hamid
22	Faheem Anwar S/O Anwar Rasheed R/O Jabbori	G.P.S saldhar No. 2	Vice Muhammad Zaher
23	Muhammad Ghayyur S/O Manzooru Samad R/O Baida	GPS Dana Sarbland	Vice Muhammad Liaqat
24	Muhammad Kaleem S/O Umar Khitab R/O Jabbori	GPS Batti Arbora	Vice Sajjad Hussain
25	Siraj Muhammad S/O Muhammad Israr R/O Malookra	GPS Malokra	Vice Muhammad Aslam
26	Fazlur Rehman S/O Khan Jee R/O Kayan	GPS Battal	Vice Muhammad Qasim

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27	SAbdulQayyum S/O Miskeen R/O Giar Sacha	GMPS Bela Badat	Vice Naheed Ahmed
28	Muhammad Israr S/O Ali Mardan R/O Shamdhara	GPS Tareda	Vice Akbar Nawaz
29	Muhammad Javed S/O Sharab Khan R/O Chela Bala	GMPS Katha Bala	Vise Muhammad Aslam
30	Muhammad Tariq S/O Mushtaq Ahmed R/O Jaida	GPS Tangri	Vice Ghulam Rabbani
31	Shahid Hussain Shah S/O Syed Maqbool Shah R/O Dambori	GMPS Lang	Vice Jahangir
32	Shah Jehan S/O Ghulam Jan R/O Khabal Bala	GPS Hassa	Muhammad Sulaman
33	Naseeb Khan S/O Noor Zaman R/O Khabal Pain	GPS Batti	Muhammad Tanveer Khan

CONSTITUENCY MERIT

34	Arshad mehmoood S/O Muhammad Younis R/O Mansehra	GPS Mahvalian	Vice Aurangzeb ptc selected On merit, hence terminate
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CONSTITUENCY MERIT

3 5.	Abdul Latif S/O Muhammad Hussain R/O Ghanool	GPS Kund	Vice Muhammad Akmal Selected on merit hence terminated
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Assured C

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

APPOINTMENT

In pursuance of Khyber Pakhtunkhwa Sacked Employees (Appointment) 2012 and Consolidate Judgment passed by Honorable Peshawar High Court Abbottabad Bench Abbottabad vide Dated 24-05-2016, 27-03-2018, 04-2018 & 07-03-2019 in W/P No 516-A/2013, 676-A/2015, 20-A/2014, 216-A/2015, 1155-A/2015, 702-A/2014, 15-A/2014, and orders of Honorable High Court in COC No.22-A/2016, COC No. 47-A/2016, COC No. 58-A/2016, COC No. 83-A/2016, COC 14/2019, and recommendation of the Departmental Selection Committee the appointment of the following candidates are hereby ordered against the vacant post of **PRIMARY SCHOOL TEACHER (PST) BPS-12 (Rs.13320-960-42120)** plus usual allowances as admissible under the rules, under the existing policy of the Provincial Government, or the terms and condition given below with effect from the date of their taking over charge:-

S. #	Name	Father's Name	Date Of Birth	Domicile	Permanent Address	Place of posting	Remarks
1.	MUHAMMAD AJMAL	SULEMAN	22-01-1961	MANSEHRA	VILLAGE CHOTIAN P/O DARBAND TEHSIL OGH I DISTRICT MANSEHRA.	GPS DOKAL GHAIKOT	AGAINST VACANT POST
2.	M.IRFAN	M.ZAMAN	15-9-1962	MANSEHRA	VILLAGE GALI BADRAL U/C SHERGARH TEHSIL OGH I DISTRICT MANSEHRA.	GPS BANDA UMERSHAH	AGAINST VACANT POST
3.	M KHALID QURESHI	AZIZ UR REHMAN	16-3-1963	MANSEHRA	VILLAGE & P/O MANDA GAUCHA TEHSIL & DISTRICT MANSEHRA	GPS PANJPOOL	AGAINST VACANT POST
4.	AKHTAR NAWAZ	HAQNAWAZ KHAN	01-07-1964	MANSEHRA	VILLAGE SACHAQ P/O SHINKIARA TEHSIL BAFFA DISTRICT MANSEHRA	GPS SUNDI	AGAINST VACANT POST
5.	MUHAMMAD SIDDIQUE	MUHAMMA D FARID	01-05-1967	MANSEHRA	VILLAGE JHANDBALA P/O SHERGARH TEHSIL OGH I DISTRICT MANSEHRA.	GMPS JOAD BALA	AGAINST VACANT POST
6.	SALAR KHAN	ABDUL AKBAR	15-03-1967	MANSEHRA	VILLAGE KARORI PAEIN P/O KARORI TEHSIL OGH I DISTRICT MANSEHRA.	GPS BANDI PARAW	AGAINST VACANT POST
7.	MUHAMMMD ANWAR	KHANIZAM AN	01-02-1968	MANSEHRA	VILLAGE KHAMLAN PAIN, LASSAN NAWAB SAHIB TEHSIL & DISTRICT MANSEHRA	GPS MIANA GALI	AGAINST VACANT POST
8.	MUHAMMAD JAVEED	AURANGZAI B	4-6-1968	MANSEHRA	VILLAGE JANDA MAIRA P/O PERHINNA TEHSIL & DISTRICT MANSEHRA.	GPS THATHI KALAN	AGAINST VACANT POST
9.	ALTAH HUSSAIN	MUHAMMD REHMAN	25-07-1968	MANSEHRA	VILLAGE CHIRYA POST OFFICE AFZALABAD TEHSIL & DISTT MANSEHRA	GPS TRANGRI PAIN	AGAINST VACANT POST
10.	MUHAMMAD SALEEM	SAMUNDAR	10-10-1968	MANSEHRA	VILLAGE SHANAYA PAEEN P/O NEW DAR. AND TEHSIL OGH I DISTRICT MANSEHRA.	GPS NAZRAL KHAN	AGAINST VACANT POST
11.	NAZAR HUSSAIN	Haji GHULAM HAIDAR	12-05-1968	MANSEHRA	VILLAGE NKKA PANI BEERH P/O OGH I TEHSIL OGH I DISTRICT MANSEHRA.	GPS CHAMB	AGAINST VACANT POST
12.	M GULAB	SIKANDAR KHAN	15-04-1969	MANSEHRA	VILLAGE RARRI, PERHINNA P/O CHANIAL TEHSIL & DISTT MANSEHRA	GPA PAWAY	AGAINST VACANT POST
13.	MUHAMMAD NAVEED	M,AYUB KHAN	5-02-1969	MANSEHRA	VILLAGE & P/O SACHAN KALAN, JABBORI TEHSIL BAFFA DISTRICT MANSEHRA.	GPS BAKKI NADIHAR	AGAINST VACANT POST
14.	GUL NIAZ	MUHAMMA D SARFRAZ	01-05-1970	MANSEHRA	VILLAGE BOZBAILA P/O JABBORI TEHSIL BAFFA DISTRICT MANSEHRA	GPS CHANYANI	AGAINST VACANT POST
15.	MUHAMMAD PERVAIZ	GUL ZAMAN	04-02-1971	MANSEHRA	VILLAGE KANSHAIN TEHSIL BALAKOT DISTRICT MANSEHRA.	GPS PHAGAL	AGAINST VACANT POST
16.	ABDUL QAYYUM	SHAH WALI	15-03-1972	MANSEHRA	VILLAGE KUND BALA U/C HILKOT TEHSIL AND DISTRICT MANSEHRA.	GPS KANDI HILKOT	AGAINST VACANT POST
17.	NAZIR MUHAMMAD	SHER MUHAMMA D	04-02-1972	MANSEHRA	VILLAGE PHULDAR P/O NEW DARBAND TEHSIL OCHI DISTRICT MANSEHRA	GPS BRADDAR	AGAINST VACANT POST
18.	M FIAZ	M ZAMAN	05-05-1972	MANSEHRA	VILLAGE DARWAIH P/O LASSAN NAWAB TEHSIL & DISTT MANSEHRA.	GPS PALSALA	AGAINST VACANT POST
19.	MUHAMMAD ARSHAD	MALIK AMAN	14-10-1973	MANSEHRA	VILLAGE JERAKH U/C SAWAN MAIRA P/O LASSAN NAWAB TEHSIL & DISTT MANSEHRA.	GPS MOHAR	AGAINST VACANT POST
20.	MUHAMMAD ASSAD	MUHAMMA D ASHRAF	13-03-1974	MANSEHRA	VILLAGE PHODARA P/O JRANGI TEHSIL & DISTRICT MANSEHRA	GPS JANDA	AGAINST VACANT POST
21.	QAISAR RAUF	ABDUL RAUF	15-03-1974	MANSEHRA	VILLAGE & P/O SACHAN KALAN, JABBORI - TEHSIL BAFFA DISTRICT MANSEHRA.	GPS RICHARI	AGAINST VACANT POST
22.	JEHANGIR KHAN	KALA KHAN	11-04-1974	MANSEHRA	VILLAGE BHERKUND P/O BHERKUND TEHSIL & DISTRICT MANSEHRA	GPS PATHAN COLONY	AGAINST VACANT POST

Advocate High Court
Advocate High Court
Mansehra

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23.	SHAMS UR REHMAN	MUHAMMAD ZAMAN	26-12-1974	MANSEHRA	VILLAGE & P/O MORAT MAIRA TEHSIL & DISTRICT MANSEHRA	GPS MOORAT MAIRA	AGAINST VACANT POST
24.	MUHAMMAD SAEED	MUHAMMAD ISRAEEL	01-07-1975	MANSEHRA	VILLAGE KALAS P/O LASSAN NAWAB TEHSIL & DISTRICT MANSEHRA	GPS CHOJA	AGAINST VACANT POST
25.	M ARSHID	SHER MUHAMMAD	03-02-1975	MANSEHRA	VILLAGE & P/O SEHAKI BALA TEHSIL & DISTRICT MANSEHRA.	GPS SEHAKI BALA	AGAINST VACANT POST
26.	ZULFIQAR ALI	MUHAMMAD FAROOQ	03-07-1975	MANSEHRA	VILLAGE NAWAN SIHER P/O PERHINNA TEHSIL & DISTRICT MANSEHRA	GPS PHALKOTE	AGAINST VACANT POST
27.	KALA KIAN	ALI ZAMAN	18-03-1975	MANSEHRA	VILLAGE KARHI SALAMIA P/O LASSAN NAWAB TEHSIL & DISTRICT MANSEHRA	GPS BANDI GULO NO.2	AGAINST VACANT POST
28.	RUSTAM	GOHER AMAN	05-01-1975	MANSEHRA	VILLAGE KALAS RACHARI P/O NAWAZABAD TEHSIL BAFFA DISTRICT MANSEHRA	GPS ANDRASI	AGAINST VACANT POST
29.	TAJ MUHAMMAD	SHER DIL	20-07-1975	MANSEHRA	VILLAGE CHAKLI PANSIAL P/O NEW DARBAND TEHSIL OCHI DISTRICT MANSEHRA	GPS GIDDO BAGLA	AGAINST VACANT POST
30.	SYED MUHAMMAD ZAFFAR SHAH	SYED SHAH ZAMAN SHAH	15-02-1976	MANSEHRA	VILLAGE CHOUNTIAN P/O PARAS TEHSIL BALAKOT DISTRICT MANSEHRA	GPS BAILA PARAS	AGAINST VACANT POST
31.	MUHAMMAD AZAM	KHAWAJ MUHAMMAD	17-04-1976	MANSEHRA	VILLAGE KHALIAN AERAN PERHINNA TEHSIL & DISTRICT MANSEHRA	GPS HARYALA	AGAINST VACANT POST
32.	SHAKEEL AHMED	M AYUB	05-04-1976	MANSEHRA	VILLAGE KALWAL P/O LASSAN NAWAB TEHSIL & DISTRICT MANSEHRA.	GPS TARMANG	AGAINST VACANT POST
33.	SYED PEER ALI SHAH	SYED FARMAN SHAH	29-08-1976	MANSEHRA	VILLAGE DEVLII POST OFFICE PHULRA TEHSIL & DISTRICT MANSEHRA	GPS KAMAR MARI	AGAINST VACANT POST
34.	DEHSHAT KHAN	HAJI FAREED KHAN	10-03-1977	MANSEHRA	VILLAGE CHATTAR PLAIN TEHSIL. BAFFA DISTRICT MANSEHRA	GPS DIHRI SHARKOOL.	AGAINST VACANT POST
35.	MUHAMMAD HAJAZ	FAQEER MUHAMMAD	09-8-1978	MANSEHRA	VILLAGE THAKAR MAIRA P/O PERHINNA TEHSIL & DISTRICT MANSEHRA	GPS PERHINNA VILLAGE	AGAINST VACANT POST


TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Their Appointment are subject are condition that, their certificates/document and domicile be verify from the concerned authority before releasing their salary in the light of Section 3 of the said ACT.
4. They will be governed by such rules & regulation enforce and as may be prescribed by the Government time to time for the category of the Government savant to which they belong.
5. Their appointment has been made in pursuance of Khyber Pakhtunkhwa, Sacked Employee (appointment) ACT 2012. Hence under Section 5 of the said ACT they shall not be entitled to any claim of the seniority, promotion and back benefits.
6. Their appointment has been made in pursuance of Khyber Pakhtunkhwa, Sacked Employee (appointment) ACT 2012. Hence Section 4 of the said ACT period during which they remained dismissed, removed or terminated from services. till the date of their appointment shall have been deemed atomically relaxed.
7. Their Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO. Anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.
8. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
9. Their pay will not be drawn until and unless a certificate to the effect by DEO is issued that his certificates/degrees are verified from the concerned board/university.
10. The Principal / Headmaster School concern is directed to submit their Degrees /Certificates etc to this office for verification from Board /University/Institutions before any payment made to them.
11. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
12. Health and Age Certificate should be produced from the Medical Superintendent King Abdullah Teaching Hospital Mansehra before taking over charge.
13. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
14. Their services shall be terminated at any time, in case his performance is found unsatisfactory during their probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
15. In case of having less qualification which ever is prescribed Academic BA for PST as well as classical certificate as profession the candidate must attain prescribed qualification for his post i.e. Academic & Professional within 3

Advocate High Court
Mansehra

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- years after issuance of this appointment order, failing which their appointment order shall stand terminated atomically, without any further notice.
16. Before handing over charge once again their documents must be checked by Head of institution and convey deficiencies in qualification to DEO office.
 17. Before handing over charge they will sign an affidavit by stating that they will not claim seniority or back benefits/service and they will acquire required qualification within stipulated period of time, failing which they will have no objection on their removal.
 18. The competent authority reserve to right to rectify the error / omission, if any noted /observed at any stage in instant order issued erroneously.
 19. The candidates appointed against the school(s) falling in summer vacation shall be handed over the charge w.e.f 01-09-2019 on opening of school after summer vacation.
 20. Their documents if found fake/bogus at any stage, their appointment order shall be withdrawn and legal action be taken against him.

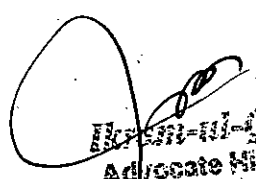

DISTRICT EDUCATION OFFICER,
(MALE) MANSEHRA

Endst: No. 1039-46 /PST/Sacked Apptt./2019/Dated Mansehra the 28/6/2019

Copy forwarded for information to the:-

1. Registrar Honorable Peshawar High Court Abbottabad Bench.
2. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. PS to Secretary Khyber Pakhtunkhwa E&SE Department Peshawar.
4. District Accounts Officer Mansehra.
5. District Monitoring Officer Mansehra.
6. All SDEO(Male) in District Mansehra.
7. Budget & Account Officer Local Office.
8. Officials Concerned.
9. Office Order File


DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA


Advocate High Court
Mansehra

(26) Annexure 'D' حاضری رپورٹ

Endosment No- 10939 - 46 از آمدہ آفس آرڈر نمبر

Dated - 20-06-2019 BPS 12 P.S.T

ڈسٹرکٹ ایجوکیشن آفس مالیرہ (مردانہ)

کے تحت سید محمد ظفر شاہ سیریل نمبر 30 P.S.T

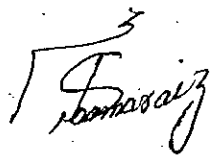
کا آرڈر گورنمنٹ پرائمری سکول بیلہ پارس میں ہوا ہے

انہوں نے P.S.T گورنمنٹ پرائمری سکول بیلہ پارس

میں آج مورخہ 19-06-22 قبل از دوپہر حاضری کر کے اپنی

پوسٹ کا چارج سنبھال لیا ہے

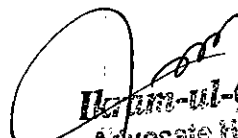
رپورٹ ارسال دستہ ہے



HEAD TEACHER
GPS Bela Paras
Circle Hungrai

22-06-2019

خط دستہ نمبر 827


Ullah-ul-Qayyum
Advocate High Court
Manshra

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D

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSHERA
HEALTH & AGE CERTIFICATE**

Name of Official Syed Muhammad Zafar Shah
 H/Father Name Syed Shah Zaman Shah
 Date of Birth 15/02/1976
 Caste of Race Syed
 Address Mon Chontian parcel
 Tehsil Balabot District Manshera
 Exact height by measurement 5' 8"
 Personal mark of Identification Nil
 National Identity Card No. 13501-1299951-3
 Signature of Official Zafar Shah
 Signature of head of Office _____

Seal of Office

I do hereby certify that I have examined Mr. Syed Muhammad Zafar Shah
Employment in the office of the Educational Department

And can not discover that he had any disease communicable or other constitutional affection or
bodily infirmity except NIL

I do not consider this as disqualification of employment in the office of
the as above. His age according to his own statement is 43 years and by appearance
about 43 Years.

Left hand thumb and finger impression

Ikram ul-Qayyum
Advocate High Court
Manshera

M
Medical Superintendent
King Abdullah Teaching
Hospital Manshera

24/06/2019 *h*



ایک میڈیکل باڈی بابت ماہ اکتوبر سال 2019

نمبر	پتہ	پتہ	پتہ	پتہ	پتہ	پتہ	پتہ
1	13501-7754671-7	13501-1299951-3	13501-1330817-5	13501-7754671-7	13501-1299951-3	13501-1330817-5	13501-7754671-7
2	0344-9545558	0344-9627378	0344-9545696	0344-9545558	0344-9627378	0344-9545696	0344-9545558
3	جان شیر خان	سید رفیق شاہ	محمد شہباز	جان شیر خان	سید رفیق شاہ	محمد شہباز	جان شیر خان
4	C.H.K	P.S.T	P.S.H.T	C.H.K	P.S.T	P.S.H.T	C.H.K
5	12:25	8:30	12:25	12:25	8:30	12:25	8:30
6	1:35	8:30	1:35	1:35	8:30	1:35	8:30
7	S	11	N	S	11	N	S
8	1:35	8:30	1:35	1:35	8:30	1:35	8:30
9	1:35	8:30	1:35	1:35	8:30	1:35	8:30
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11	1:35	8:30	1:35	1:35	8:30	1:35	8:30
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26	1:35	8:30	1:35	1:35	8:30	1:35	8:30
27	1:35	8:30	1:35	1:35	8:30	1:35	8:30
28	1:35	8:30	1:35	1:35	8:30	1:35	8:30
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30	1:35	8:30	1:35	1:35	8:30	1:35	8:30
31	1:35	8:30	1:35	1:35	8:30	1:35	8:30

Handwritten signature and date: 21/10/19

رجسٹرڈ حاضری مدد سینیئر ٹیچر ایمر ایڈمیٹری سکول میڈیکل باڈی بابت ماہ اکتوبر سال 2019

نمبر	پتہ	پتہ	پتہ	پتہ	پتہ	پتہ	پتہ
1	13501-7754671-7	13501-1299951-3	13501-1330817-5	13501-7754671-7	13501-1299951-3	13501-1330817-5	13501-7754671-7
2	0344-9545558	0344-9627378	0344-9545696	0344-9545558	0344-9627378	0344-9545696	0344-9545558
3	جان شیر خان	سید رفیق شاہ	محمد شہباز	جان شیر خان	سید رفیق شاہ	محمد شہباز	جان شیر خان
4	C.H.K	P.S.T	P.S.H.T	C.H.K	P.S.T	P.S.H.T	C.H.K
5	12:25	8:30	12:25	12:25	8:30	12:25	8:30
6	1:35	8:30	1:35	1:35	8:30	1:35	8:30
7	S	11	N	S	11	N	S
8	1:35	8:30	1:35	1:35	8:30	1:35	8:30
9	1:35	8:30	1:35	1:35	8:30	1:35	8:30
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16	1:35	8:30	1:35	1:35	8:30	1:35	8:30
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18	1:35	8:30	1:35	1:35	8:30	1:35	8:30
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26	1:35	8:30	1:35	1:35	8:30	1:35	8:30
27	1:35	8:30	1:35	1:35	8:30	1:35	8:30
28	1:35	8:30	1:35	1:35	8:30	1:35	8:30
29	1:35	8:30	1:35	1:35	8:30	1:35	8:30
30	1:35	8:30	1:35	1:35	8:30	1:35	8:30
31	1:35	8:30	1:35	1:35	8:30	1:35	8:30

Handwritten signature and date: 21/10/19

Advocate High Court
Manshra

31

Amir

E



FINAL SHOW CAUSE NOTICE

I, Mr. Khan Muhammad District Education Officer (D.E.O.) the competent authority under the Khyber Pakhtunkhwa Government (Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you Mr. Syed Muhammad Zaffar Shah Zaman Shah PST GPS Bala Paras District Manshera.

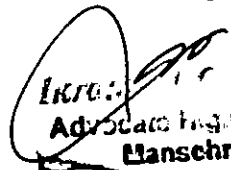
- i. Whereas a Showcause Notice was issued vide this office No. 24/19/2019 and you have failed to submit your reply within time
- ii. Whereas the Final Showcause with same charges is re-submitted vide this office No. 24/19/2019
- iii. Whereas Mr. Syed Muhammad Zaffar Shah PST was re-appointed and posted at Bala Paras District Manshera under sacked Employee Act 2011 vide this office No. Endst No.10239-46 dated 20-06-2019. On the basis of documents provided by you as per direction of Honourable Peshawar High Court Abbottabad bench vide its judgment dated 03-04-2018
- iv. Whereas according to the Terms and Condition NO 20 of the appointment order that "their documents if found fake/bogus at any stage their appointments order shall be withdrawn and legal action be taken against him"
- v. Whereas after issuing of appointment order the competent authority and a retired SDEO Balakot Manshera for re-verification of record of Mr. Syed Muhammad Zaffar Shah PST vide letter No. 10691-95 dated 27-06-2019
- vi. After verification of your documents/service record, fake and false entries have been found in your service record
- vii. Whereas as per report of the SDEO Balakot vide dated 11-07-2019 with the remarks that "no such record was found of the said person in our official record of CMPS for the period 1996-1997."
- viii. Whereupon the initial inquiry constituted by the officer 06-08-2019 the said person submitted report to this office on 07-10-2019, with the remarks that he was not in school hence the case is false so the appointments order may be withdrawn and that you have committed misconduct/irregularity thus violated E.D.R. 2011
- ix. I am satisfied that you found guilty of misconduct/irregularity as specified in rule 3 of the said rules. Thus you have rendered yourself liable for punishment against under the said rules.

2 In exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, the competent authority is hereby directed to serve you with the show cause notice with the direction to submit your defense in writing within 07 (seven) days of the receipt of this notice as to why one of the major penalty of rule-4 of the said rules should not be imposed upon you

3 In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and an ex-parte decision will be taken against you.

Syed Muhammad Zaffar Shah S/o
Syed Shah Zaman Shah
PST GPS Bala Paras District Manshera


COMPETENT AUTHORITY


Advocate High Court
Manshera

(31A)

(E)

FINAL SHOW CAUSE NOTICE

1. I, Mr. Khan Muhammad District Education Officer (M) Mansehra as a competent authority under the Khyber Pakhtunkhwa Government (Efficiency and Discipline) Rules 2011, do hereby serve you Mr. Syed Muhammad Zaffar Shah S/O Syed Shah Zaman Shah PST GPS Baila Paras District Mansehra are as follows.
 - i. Whereas a Show cause Notice was issued this office No 14310 dated 29-06-2019 have failed to submit your reply with in time.
 - ii. Whereas the final show cause with same charge is terminated to yourself for easily reply.
 - iii. Whereas Mr. Syed Muhammad Zaffar Shah PST was appointed and posted at GPS Baila Paras District Mansehra under sacked Employee Act 2012 vide this office vide order Endst No.10239-46 dated 20.06.2019. on the basis of document provide by you as per direction of Honorable Peshawar High Court Abbottabad Bench vide his judgment dated 03-04-2018.
 - iv. Whereas according to the terms and conditions No20 of the appointment order as that their documents if found fake/bogus at any stage their appointment under shall be withdrawn and legal action be taken against him.
 - v. Whereas after issuing of appointment order the competent authority sent a letter at the SDEO Thakot Mansehra for re verification of record o Syed Muhammad Zaffar Shah PST vide letter no 10691-95 dated 25.06.2019.
 - vi. After verification of your documents/service record fake documents has been found in your service record.
 - vii. Whereas as per report of the SDEO Balakot vide dated 11.07.2019 with the remarks that no such record was found of the said person in our official record of GMPS Targai for the period 1996-97.
 - viii. Whereupon the initially inquiry constitute by the officer 01.09.2019 the said committee submitted report for the above on 07.10.2019 with the remarks that the record was found in school hence the case is take so the appointment order may be withdrawn at shown that you have committed misconduct/illegally this violated E&D rule 2011.
 - ix. I am satisfied that you found guilty of misconduct inefficiency and committed that act as a specified rule 3 of the said rule. Thus you have rendered yourself liable to be proceeded as against under the said rule.
2. In exercise of the powers certificate conferred by the Khyber Pakhtunkhwa Government servant (Efficiency and Discipline) Rules 2011 the competent authority is hereby please to serve you with the show cause notice with the direction to submit you're your defense in writing within 07 days for the receipt of this notice as to why one of the major penalty of rule-4 of the said rule should not be imposed upon you.
3. In case you failed to submit your reply within the stipulated period. It will be presumed that you have no defense to after and an ex- partee decision will be taken against you.

COMPETENT AUTHORITY

Syed Muhammad Zaffar Shah S/O
Syed Shah Zaman Shah
PST GPS Baila Paras, District Mansehra.

(37) *Assure* (F) 118

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

Phone # 0997-382271

Fax # 0997-382244

E-mail Address: edoedu@mansehra@yahoo.com

NOTIFICATION

Mr. Syed Muhammad Zaffar Shah S/O S. Shah Zaman Shah PST GPS Baila Paras /HEREAS

Mr. Syed Muhammad Zaffar Shah PST GPS Baila Paras Circle Mansehra was proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of fake and fabricated documents have been found in service record and tempering in documents was proved.

- i. Whereas Mr. Syed Muhammad Zaffar Shah PST was reappointed and posted at GPS Baila Paras District Mansehra under sacked Employee Act 2012 vide this office vide Endst No. 10239-46 dated 20-06-2019. On the basis of documents provided by you as per direction of Honourable Peshawar High Court Abbottabad Bench vide his judgment dated 03-04-2018.
- ii. Whereas according to the Terms and Condition NO.20 of the appointment order is that "their documents if found fake/bogus at any stage, their appointment order shall be withdrawn and legal action be taken against him."
- iii. Whereas after issuing of appointment order the competent authority sent a letter to the SDEO Balakot GMPS Tangri Mansehra for verification of record of Mr. Syed Muhammad Zaffar Shah PST GMPS Tangri vide letter No.10691-95 dated 25-06-2019.
- iv. After verification of your documents/service record, fake and fabricated documents have been found in your service record.
- v. Whereupon the initial inquiry conducted by the officer on 06-08-2019, the said committee submitted report to this office on 12-08-2019, with the remarks that Mr Syed Muhammad Zaffar Shah tempered/forged his name in Appointment & Termination order, and no record was found in school record the case is fake, so the appointment order may be withdrawn. It shows that you have committed misconduct./illegality thus violated E&D rule, 2011.
- vi. Whereas, as per report of the SDEO Balakot vide dated 11-07-2019 with the remarks that "Mr. Syed Muhammad Zaffar Shah PST has never ever been appointed vide Endst No.124-30 dated 01-01-1996 at GMPS Tangri, whereas the appointment documents in r/o Mr. Syed Muhammad Zaffar Shah PST are Fake, some unscrupulous elements are trying to submit the fake record of sacked employee in your office, His First appointment order, charge report arrival report, acquaintance role, attendance register, log book and appointment order file were checked no such record was found of the said person in our school for the period 1996-1997. According to the record the said school working as GPS Tangri instead of GMPS Tangri since 1932, As the appointment order of Syed Muhammad Zaffar Shah is revealed that he was appointed at GMPS Tangri
- vii. Whereas as per report dated 12-08-2019, a showcause notice was issued to concerned vide this office No. 14310 dated 29-08-2019, but failed to reply within time, Respondent department issue final show cause notice vide office No.15696 dated 21-09-2019 and no reply has been received so far.
- viii. Whereas, he was called for personal hearing vide this office No.16411-15 dated 05-10-2019, but he did not attend the personal hearing before the Competent Authority. Whereas he was again called for personal hearing on 01-11-2019, while attending the office of undersigned on 07-11-2019 and heard.
- ix. Whereas the competent authority District Education Officer (M) E&SE Mansehra after having considered the charges and evidence on record, perusal of reply of show cause notice & Personal hearing is of the view that the charges against the accused Teacher have been proved. Therefore the appointment order vide Endst No. 10239-46 dated 20-06-2019 in r/o Mr. Syed Muhammad Zaffar Shah PST GPS Baila Paras Mansehra is hereby WITHDRAWN from the date of issue of re-appointment order (Ab-initio Withdrawn) with immediate effect.

Sd/-

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No. 17761-66 F.No.Final Showcause/Appointt: 2019 (M)//Dated 09/11/2019

Copy forwarded for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (IMU) Mansehra.
3. District Account Officer Mansehra.
4. SDEO Concerned.
5. Head Teacher GPS Baila Paras.
6. Mr. Syed Muhammad Zaffar Shah Residence of village & P/o Paras Mohallah Chotian Tehsil Balakot District Mansehra.
7. Office File.

Ikram ul Qayyum
Advocate High Court
Mansehra

09/11/19
DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

حکومت خیابان ڈیڑھ کراچی (37) ایجنسی اور اسکول میں لکھنؤ میں ڈیڑھ
عنوان بحالی آرڈر P.S. (9)

Director sb
appeal

صاف علی 1
تو باہر زرنگ ہو گیا ہے بل پر طرف فلائرش میں سے ایک سے
سٹیل کا آرڈر محکمہ تعلیم سندھ 06/2019 کو فحاک کاغذات
وغیرہ کی صفحہ میں ایک نوٹیفکیشن پر ٹیچر اسکول بدلیہ پارس میں
کو دیا گیا ہے وہاں جاری رہی خاطر یہ کہ بعد اس طریق سے لیت
قرائن سرانجام دیا گیا

سابقہ نمبر 3-1299951

یہ سٹیٹ سٹیل گاڑیوں میں ماہانہ سے زیادہ ہوئی تو سٹیل کو
تعمیر کیا تو اس اور تعمیر کسی عرصہ کے لئے نکال دیا گیا اور سٹیل
نے اس ٹرنک میں آرڈر میں جو کچھ لکھا ہے، سٹیل کے خلاف سراسر
ظلم و ستمزادگی اور ڈیڑھ کے خلاف ہے۔ کیونکہ سٹیل گاڑیوں کو
مورس یا ٹرنک یا کوئی بھی غلط نہیں ہے۔

حکومت نے معلوم نہیں کہ سٹیل کو کیوں نکالا ہے، حالانکہ سٹیل آرڈر
سے قبل تمام کاغذات وغیرہ کی جان میں وکس آرڈر لکھا تھا۔
لہذا سٹیل آرڈر سے ملنے ہے۔ سٹیل کے لئے عدالت آرڈر ہو گیا ہے اور اب
سٹیل کو غلط اثرات لگایا گیا ہے۔ جو سٹیل کے ساتھ سراسر ظلم
زادہ ہے۔ اس لیے سٹیل کو بحال کر کے سٹیل کے حق دیا جائے۔ سٹیل نہیں ہے
درخواست دی گئی ہے اس پر کوئی عمل نہیں ہوا۔
میں تو اس میں ہو گیا۔

0346-9627378
حون وطن
بدر ظفر
12/12/2019

Ikram-ul-Qayyum
Advocate High Court
Manshra

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA
MINUTES OF THE MEETING OF DISTRICT SELECTION COMMITTEE HELD ON 11 JUNE 2019 AT 12:00 PM IN THE OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

A meeting of the District Selection Committee was held on June 11-06-2019 at 12:00 PM under the chairmanship of District Education Officer (Male) Mansehra for determining of eligibility & suitability for appointment of PST, C.T, T.T, QARI, A.T, DM, PET, Junior Clerk & Class-IV Sacked Employees, in the Elementary and Secondary Education Department Khyber Pakhtunkhwa District Mansehra under sacked employee Act 2012 & in light of decision passed by Honorable Peshawar High Court Abbottabad Bench Abbottabad in COC No.22-a/2016, COC 47-a/2016, COC58-a/2016, COC83-a/2016, in the light of judgments/order sheet vide dated 24-05-2016, 27-03-2018, 03-04-2018 & 07-03-2019, in w/p no 516-a/2013, 676-a/2015, 20-a/2014, 216-a/2015, 1155-a/2015, 702-a/2014, 115-A/2014, and under subsequent COC,s under process before Honorable Peshawar High Court Abbottabad Bench.

The following attended the meeting:-

- | | |
|---|--------------|
| 1. Mr. Khan Muhammad D.E.O (Male) Mansehra | In Chairman. |
| 2. Mr. Zahid Hussain Dy: D.E.O (Male) Mansehra | Member |
| 3. DEO (F) Mansehra Representative of the Director | Member |
| 4. Mr. Tariq Mehmood Supdt: (Estt :) DEO (M) Office Mansehra. | Member |
| 5. Mr. Saif UI Malik ADEO (Estt :) (M) Mansehra | Member |
| 6. Mr. Sakinullah ADEO (Lit :) Local Office Mansehra | Member |

The meeting started with recitation from the Holy Quran. The chair briefed the forum regarding criteria of eligibility and suitability for appointment under the Sacked Employee (Appointment) Act 2012. The Assistant District Education Officer (Litigation) explained the legal aspects of the Act and informed the forum that according to the said Act & the judgment of Honorable Peshawar High Court Abbottabad Bench (dated 24-05-2016, 27-03-2018, 03-04-2018 & 07-03-2019) in which the employees who were terminated in the period between 01-11-1993 to 30-11-1996 will have to be re-appointed if they fulfill the criteria fixed for selection. He told the forum that a process was started by receiving the applications from the candidates for re-instatement under the Act as per procedure lays down in sacked Employee Act 2012. The application received on the direction of Honorable Peshawar High Court Abbottabad Bench, this office received applications for each category as per detail given below,

CT=15, PST=133, AT=07, TT=11, DM=01 JC=07 PET=03, QARI=06, C-IV=07 TOTAL=190.

He further told that all the applications were received within stipulated period of time as per directions of the court and this office constituted scrutiny committee vide Endst: No 6359-61/ dated 07-04-2018 for scrutinizing the documents of the applicants for determining the eligibility of candidates for re-appointment against the above mentioned posts. The scrutiny committees submitted its report on 29-08-2018, and again re-check the documents and submitted his detail report on 15-03-2019, as per direction of Honorable Court in COC No.22-a/2016, COC 47-a/2016, COC58-a/2016, COC83-a/2016, this office nominated an inquiry officer vide Endst No.14120 dated 24-09-2018, Mr. Luqman Ali Khan Principal GHSS NO.1 Mansehra for verification of record of sacked employee, the officer submitted his complete report with the remarks that the scrutiny committee will consider the eligibility/suitability in the light of sacked Employee Act 2012, the competent authority constituted the scrutiny committee vide Endst No : 9010-11 dated 27-12-2018 for scrutinizing the documents of the applicants for determining the eligibility of candidates for re-appointment against the above mentioned posts. The scrutiny committee submitted its report on 13-03-2019.

Arif Dayyem
Advocate High Court
Mansehra

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In the light of the report of the scrutiny committee the deficiency letter have been sent to the candidates as well as exhibited on the notice board, in response to the deficiencies letter the candidates have re-submitted their documents regarding removal of objections of committee, in continuation of the process a letter No. 6344-46 dated 18-04-2019 regarding the constitution of committee was issued and the whole documents were put up to the committee for scrutinizing the documents of the applicants for determining the eligibility of candidates for re-appointment against the above mentioned posts. The scrutiny committees submitted its detail report on 11-05-2019.

The chair asked the Superintendent local office to brief the forum regarding number of vacant posts in light of the said Act. The Superintendent informed the forum that in light of section 3 of the Sacked Employees (Appointment) Act 2012, 30% of vacant posts are to be filled through Sacked Employees. He elaborated the Number of posts under these criteria as below;

PST	126	DM	05
CT	09	PET	10
TT	05	QARI	7
AT	6	J/CLERK	01
CLASS-IV	NIL	TOTAL	169

The chair asked the Superintendent Establishment for placing all the applications before the committee for scrutiny and checking of date birth, Appointment Order, Adjustment order/Transfer orders, Charge Report, Attendance Register, Medical certificate Termination orders, Service Books and qualifications with dates. The committee checked the applications and document of the following candidates of various categories one by one and determined their eligibility and suitability for appointment in light of Sacked Employees (appointment) Act 2012, and in light of decision passed by Honorable Peshawar High Court Abbottabad Bench Abbottabad and recorded their remarks of **Recommended, Differ** and **Rejected** against the name of each candidate in the column of remarks.

1. PRIMARY SCHOOL TEACHER:

The forum was briefed that only those candidates are eligible in light of Sacked Employee (Appointment) ACT 2012 who were appointed during 01/11/1993 to 30/11/1996 and terminated during the period 01/11/1996 to 31/12/1998. The forum was further briefed that under the P.S.T Category (133) candidates have submitted their applications, after detail deliberation/perusal of record the following decision were made. The committee checked the record of all candidates one by one and determined their eligibility and suitability for appointment in light of Sacked Employees (appointment) Act 2012, and recorded their remarks **Recommended, Differed** and **Rejected** against the name of each candidate in the column of remarks.

S#	NAME OF TEACHER	FATHER NAME	DATE OF BIRTH	Domicile	Endst No	Date Of IST App	Issuing Authority	Endst No	D/O Termination	App:	CNIC	Apptt: order	Arr: Report	S/ Book	Att: Reg:	Qulf :	Dom:	Term: order	REMARKS
1	M.KHALID	M.AMEER	1/4/1963	Mansehra	730-35	17-1-1996	DEO (M) Primary: Mans	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	SSC	yes	Nil	Rejected
2	ABDUL RASHEED	ABDUL WAHAB	8/1/1965	Mansehra	1028-33	17-1-1996	do	NIL	NIL	Yes	Nil	Nil	Nil	Nil	Nil	SSC	yes	Nil	Rejected

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	RUSTAM	GOHER AMAN	5/1/1975	Mansehra	1878-83	27-2-1996	do	1678-1713	26-6-1997	yes	yes	yes	yes	Nil	Nil	SSC	Yes	yes	Recommended For Appointment.
	KALA KHAN	ALI ZAMAN	18-03-1975	Mansehra	1122-1127	17-1-1996	do	1508-1609	26-6-1997	yes	yes	yes	yes	Yes	Yes	SSC	Yes	yes	Recommended For Appointment
	SYED MUHAMMAD ZAFFAR SHAH	SYED SHAH ZAMAN SHAH	15-02-1976	Mansehra	124-30	1/1/1996	do	7686-99	28-4-1997	yes	yes	yes	yes	yes	yes	yes	yes	yes	Recommended For Appointment
	MUHAMMAD AZAM	KHUWAJ MUHAMMAD	17-04-1976	Mansehra	2485-2626	22-11-94	do	217-367	13-2-1997	Yes	Yes	Yes	yes	Yes	yes	yes	Yes	yes	Recommended For Appointment
	SYED PEER ALI SHAH	SYED FARMAN SHAH	29-08-1976	Mansehra	824-29	17-1-1996	do	1636-77	26-6-1997	Yes	Yes	Yes	Yes	Yes	yes	yes	Yes	yes	Recommended For Appointment
	MUHAMMAD EJAZ	FAQEER MUHAMMAD	9/8/1978	Mansehra	884-89	17-1-1996	do	1636-77	26-6-97	Yes	Yes	Yes	yes		yes	yes		yes	Recommended For Appointment
	ARSHAD	MALIK AMAN	14-10-1973	Mansehra	1068-73	17-01-96	do	1508-1609	26-6-97	Yes	Yes	Yes	yes	Yes	yes	yes	Yes	yes	Recommended For Appointment
3	MUHAMMAD SALEEM	SAMUNDAR	10/10/1968	Mansehra	2485-2626	22-11-94	do	1508-1609	26-6-1997	yes	yes	yes	yes	yes		F.A	yes	yes	Recommended For Appointment
4	ABDUL QAYYUM	SHAH WALI	15-03-1972	Mansehra	3074-79	10/4/1996	do	1678-1713	26-6-1997	Yes	Yes	Yes	yes	Yes	Yes	FA	yes	yes	Recommended For Appointment
5	MUHAMMAD ASLAM	GUL ZAMAN	4/5/1972	Mansehra	104-10	1/1/1996	do	1678-1713	26-6-1997	yes	Yes	yes	Nil	Nil	yes	SSC	Yes	yes	Differed/due to non provision of adjustment order.
6	M FIAZ	M ZAMAN	5/5/1972	Mansehra	3234-39	23-4-1996	do	1508-1609	26-6-1997	yes	yes	yes	yes	yes	yes		yes	yes	Recommended For Appointment
17	MUHAMMAD ASSAD	MUHAMMAD ASHRAF	13-03-1974	Mansehra	932-37	17-1-1996	do	1508-1609	26-6-1997	yes	yes	yes	yes	yes	yes	F.A	yes	yes	Recommended For Appointment
38	MUHAMMAD SAEED	MUHAMMAD ISRAEEL	1/7/1975	Mansehra	749-55	30-4-95	do	1508-1609	26-6-1997	yes	Yes	yes	Nil	Nil	yes	SSC	yes	yes	Recommended For Appointment

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30	ZARDAD KHAN	HADAYTULLAH	13-6-1965	Mansehra	2756-0-71	20-10-96	do	1605-2-189	7/7/1996	Yes	yes	yes	yes	Nil	Nil	SSC	Yes	Nil	Rejected
31	MUHAMMAD SAEED	SYED SARDAR SHAH	3/5/1974	Mansehra	7211-12	10/10/1996	do	NIL	NIL	Yes	yes	yes	yes	Nil	Nil	SSC	Yes	Nil	Rejected
32	MUHAMMAD NAZIR	MUHAMMAD MAROOF	2/3/1978	Mansehra	308-13//6-435-42	4/1/1996 6/11/1996	do	Nil	Nil	Yes	yes	yes	yes	Nil	Nil	SSC	Yes	Nil	Rejected
33	MUHAMMAD HANIF	ABDULLAH	4/4/1973	Mansehra	508-1609	126-6-1997	do	1508-1609	26-6-97	Nil	Nil	yes	yes	Nil	Nil	SSC	Yes	Nil	Rejected

DECISIONS:

After thorough deliberation and perusal of record the committee recommended the candidates at serial No 55-84, and 86-90(35 Candidates) were possessed the required documents and prescribed qualification i.e. Both academic and professional at the time of their appointment hence the committee declared these candidates as **Recommended** in light of sacked employee (appointment act 2012), while the candidates at serial No 85 and 126 are declared Differed due to non provision of adjustment orders. whereas the candidates at serial No.01-54, and 91-125 and 127-133 were rejected as they did not possessed the required Documents at the time of scrutiny hence the committee declared these candidates were **Rejected** in the light of Sacked Employee (Appointment) Act 2012.

ii. CERTIFIED TEACHERS:

The forum was briefed that only those candidates are eligible in light of Sacked Employee (Appointment) ACT 2012 who were appointed during 01/11/1993 to 30/11/1996 and terminated during the period 01/11/1996 to 31/12/1998. The forum was further briefed that under the C.T Category (15) candidates have submitted their applications other conditions are the same as was for the PST candidates, After detail deliberation/perusal of record the following decision were made. The committee checked the record of all candidates one by one and determined their eligibility and suitability for appointment in light of Sacked Employees (appointment) Act 2012, and recorded their remarks **RECOMMENDED, REJECTED** against the name of each candidate in the column of remark.

S#	NAME OF TEACHER	FATHER NAME	DATE OF BIRTH	DOMICILE	Endst No	DATE OF IST APPOINTMENT:	Issuing Authority	Endst No	D/O Termination	App:	CNIC	App: order	Arr: Report	S/Book	Att: Reg:	Qual: f:	Dom:	Termination order	REMARKS
1	M. PERVAIZ	DURIAMAN	5/6/1963	Mans ehra	1232-4-26	30/05/1995	Div: Dir: Hazar Atd	2134-3528	13-2-1997	Yes	Yes	Yes	Yes	yes	Yes	BA	Yes	Yes	RECOMMENDED FOR APPOINTMENT

D.M No. 199
 BC No. 10 4 2 5 1 8
 Name of Advocate اکرم الہوج

S.No 36751
 Fee Rs. 100/-



وکالت نامہ
 General Secretary
 District Bar Association

بعدالت: حساب سروس نرہوٹل سار
 عنوان: سدرج ظور شاہ
 منجانب: ایسڈیٹ
 نوعیت مقدمہ: سروس اجل

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام ایسڈیٹ کے لئے
اکرم الہوج - مابہ ایسڈیٹ اور مابہ ایسڈیٹ
 کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے
 جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ
 میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پکھری کے علاوہ
 کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ پکھری کے علاوہ
 کسی اور جگہ سماعت ہوا یا پکھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار
 نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست
 بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کا روپیہ وصول
 کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دثالی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف
 کر بشرط ادائیگی علیحدہ محتاتنا ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو
 بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو
 اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت
 میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداخت وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔
 لہذا وکالت نامہ لکھ دیا ہے اور دستخط انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

بید محمد ظفر شاہ
 Zafar Shah

مورخہ 20

ACCERTED
 Ikram-ur-Rahman
 Advocate High Court
 Manshera

"A"

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

No.

APPEAL No. 11883 of 20 20

T.B

Syed Muhammad Zafar Khan
Appellant/Petitioner

Versus

Serj. Edm: M. P. P. Khan
RESPONDENT(S)

Counsel
Notice to Appellant/Petitioner Muhammad Qasim
Advocate High Court
Mardan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 18/11/2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court A Head

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.