

20.01.2021

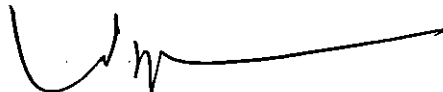
Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer, Hayat Khan Assistant Director and Abdul Wahid ADEO for respondents present.


Vide detailed judgment of today of this Tribunal placed on file of connected service appeal No.1014/2019 tilted Mst. Ishrat Vs. Education Department, the impugned orders stand set aside and the appellant is reinstated in service with direction to the Department to conduct proper inquiry. They shall investigate the issue through a proper inquiry reaching to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter, the fate of appellant be decided in the light of the said inquiry. The respondents shall conclude the proceedings within 90 days after receipt of this judgment. The issue of back benefits shall be subject to the outcome of inquiry. With no order as to costs. File be consigned to the record room.

Announced.

20.01.2021



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



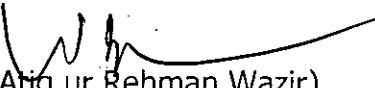
(Rozina Rehman)  
Member (J)


09.12.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Salim Law Officer, Fahim Ullah Law Officer and Murtaza Superintendent for respondents present.

File to come up alongwith connected appeal No.1014/2019, on 12.01.2021 for before D.B.

  
(Atiq ur Rehman Wazir)  
Member (E)


  
(Rozina Rehman)  
Member (J)


12.01.2021

Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer for respondents present.

File to come up alongwith connected appeal No.1014/2019 on 20.01.2021 before D.B.

  
(Atiq ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

12.08.2020


Due to summer vacations case to come up for the same on  
~~15.08~~.2020 before D.B.

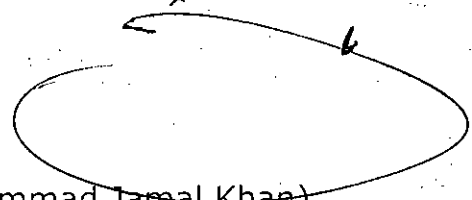
  
Reader

15.10.2020

Mr. Khalid Khan Mohmand, Advocate, for appellant is present. Mr. Muhammad Jan, Deputy District Attorney alongwith representative of the department Mr. Hazrat Shah, Section Officer, are also present.

Learned counsel submitted that his senior has proceeded to Dar-ul-Qaza Mingora bench of the Hon'ble Peshawar High Court, Peshawar, and cannot attend the Tribunal today. Requested for adjournment. Adjourned to 17.11.2020 on which to come up for arguments before D.B.

  
(Atiq-ur-Rehman Wazir)  
Member (Executive)

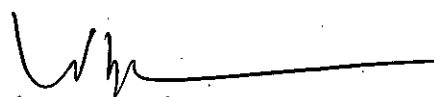
  
(Muhammad Jamal Khan)  
Member (Judicial)


17.11.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Saleem Law Officer for respondents present.

To come up alongwith connected file No.1014/2019, on 09.12.2020 before D.B.

  
(Atiq ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

31.03.2020

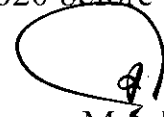
Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.

  
Reader

23.06.2020

Counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Mr. Muhammad Irfan Assistant, representative of respondents No.1 & 2 present and submitted reply on behalf of the said respondents.

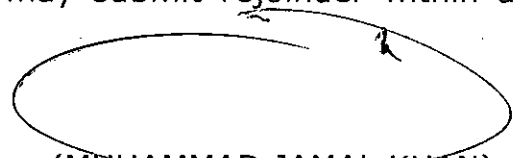
Muhsin Hassan Khan present and submitted authority letter on behalf of respondent No.3 with a request for another adjournment; adjourned but on cost of Rs.2000/-. To come up for written reply/comments of respondent No.3, on 22.07.2020 before S.B

  
Member

22.07.2020

Appellant himself is present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Mohsin, Litigation Officer on behalf of respondent No. 3 are also present.

Joint para-wise comments on behalf of respondents No. 1 & 2 have already been submitted while representative of respondent No. 3 submitted written reply today which is placed on record. Representative of respondent No. 3 also paid Rs. 2000/- as per previous order sheet dated 23.06.2020 which is handed over to appellant and receipt thereof also obtained from the appellant, which is placed on record. File to come up for arguments on 12.08.2020 before D.B. The appellant may submit rejoinder within a fortnight, if so advised.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER

10.02.2020

Learned counsel for the appellant present. Written reply not submitted. M/S Irfan Ali Assistant (for respondents No.1 & 2) and Mehtab Gul Law Officer (for respondent No.3) present. Representatives of respondents requested for a short adjournment to furnish reply. Granted. To come up for written reply/comments on 24.02.2020 before S.B.



Member

24.02.2020

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Hayat Khan, AD and Mehtab Gul, Law Officer for the respondents present. Respondents, still seek time to submit reply/comments. Last chance is granted. To come up for written reply/comments on 12.03.2020.

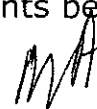


(Hussain Shah)

Member

12.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith M/S Hayat, Assistant Director on behalf of respondents No. 1 & 2 and Iftikhar Bangash on behalf of respondent No. 3 present. Written reply on behalf of respondents not submitted despite last chance. Both the representatives of the department seek further time to furnish written reply/comments. Last chance is extended to 31.03.2020 for written reply/comments before S.B.



(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

19.12.2019

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of respondents seeks further time to furnish reply/comments. Adjourned to 08.01.2020 on which date the requisite reply/comments shall positively be submitted.

  
Chairman

08.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Irfanullah, Assistant for respondents No. 1 & 2 present. Nemo for respondent No. 3.

Representative of respondents No. 1 & 2 seeks time. Fresh notice be issued to respondent No. 3. To come up for written reply/comments on 24.01.2020 before S.B.

  
Chairman

24.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

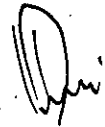
Representative of the respondents seeks short adjournment for submission of reply/comments. Adjourned to 10.02.2020 on which date the requisite reply/comments shall positively be furnished.

  
Chairman

19.09.2019

Counsel for the appellant present.

On the strength of admitting note dated 06.09.2019 recorded in Appeal No. 958/2019 instant appeal, having similar facts, is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.11.2019 before S.B.



Chairman

18.11.2019

Counsel for the appellant present.

Learned counsel states that security and process fee could not be deposited due to ignorance of appellant and submitted an application for extension of time to deposit the same.

Application is accepted and the appellant is allowed to deposit security and process fee within three working days from today. After such deposit, notices be issued to the respondents for submission of written reply/comments on 19.12.2019 before S.B.

Appellant Deposited  
Security & Process Fee  
18/11/19

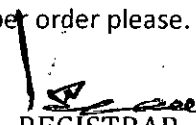



Chairman

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 1041/2019

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1-    | 07/08/2019                | <p>The appeal of Mr. Abdul Hai presented today by Mr. Amin-ur-Rehman Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR 07/8/19</p> |
| 2-    | 20/08/19.                 | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/09/19.</u></p> <p style="text-align: right;"><br/>CHAIRMAN</p>  |

P-25



**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR**

Service Appeal No. 1049/2019

Abdul Hai ..... Appellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 others ..... Respondents

**I N D E X**

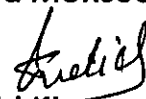
| S.No | Description of documents  | Annex | Pages |
|------|---|-------|-------|
| 1.   | Service Appeal  |       | 1-4   |
| 2.   | Application for Grant of Status Quo alongwith Affidavit                       |       | 5-6   |
| 3.   | Addresses of the parties  |       | 7     |
| 4.   | CNIC  | "A"   | 8     |
| 5.   | CV  | "B"   | 9     |
| 6.   | Educational Testimonials  | "C"   | 10-15 |
| 7.   | Notification dated: 25.11.2008  | "D"   | 16    |
| 8.   | Service Regularization Notification dated: 05.01.2010 and Medical Certificate | "E"   | 17-24 |
| 9.   | Impugned Notification dated: 04.04.2019                                       | "F"   | 25    |
| 10.  | Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number         | "G"   | 26-27 |
| 11.  | Wakalatnama   |       | 28    |

  
Appellant  
Through

**Amin ur Rehman Yusufzai**

  
**Sajjad Mehsud**

&

  
**Khalid Khan**

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

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019

1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR**

Service Appeal No. 1041 /2019

Abdul Hai S/o Muhammad Tayyeb, Ex-SST (Gen),  
R/O Village Sharif Khana, P.O Loisam Tehsil, Nawagai, Tribal District Bajour.

**Khyber Pakhtunkhwa  
Service Tribunal** Appellant

....VERSUS....

Diary No. 1157  
Dated 07-8-2019

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

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

NOTIFICATION ENDORSEMENT NO.5757-62, DATED: 04.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT/REGULARIZATION NOTIFICATION DATED: 05.01.2010, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED.

**PRAYER-IN-APPEAL:**

On Acceptance of Instant Appeal, the Impugned Notification dated 04.04.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, Hence, be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

**Respectfully Sheweth:**

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of Tribal District Bajour.  
(Copy of CNIC, is attached as Annexure "A")
2. That appellant obtained double Master Degrees, in the year 2005 & 2014 and having passed C.T, B.Ed & M.Ed Degree Courses from Allama Iqbal Open University, Islamabad.  
(Copies of CV and Educational Testimonials, are attached as Annexure "B" & "C", respectively)
3. That appellant was appointed by the competent authority, as SST (BPS-16), on contract basis, for a period of one year, vide Notification Endorsement No.5139-5197/A-14/SST/M&F/Contract One year, dated: 25.11.2008.  
(Copy of Notification dated: 25.11.2008, is attached as Annexure "D")

Filed to-day  
Registrar  
7/8/19

4. That appellant was regularized in service, by the competent authority, with effect from 01.01.2009, under the KP Employees (Regularization of Services) Act, 2009, vide Notification Endorsement No.684-710/A-14/SET(M)Regularization/FATA, dated: 05.01.2010.  
**(Copy of Service Regularization Notification dated: 05.01.2010 and Medical Certificate, is attached as Annexure "E")**
  
5. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however he has unilaterally been shunt-out from service, vide impugned Notification dated: 04.04.2019 by respondent No.2, without due process and following the law/rules governing the subject.  
**(Copies of Impugned Notification dated: 04.04.2019, is attached as Annexure "F")**
  
6. That appellant preferred departmental appeal dated: 16.04.2019 to respondent No.1 which was received vide Diary No. 1001 dated: 16.04.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.  
**(Copies of Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number, is attached as Annexure "G")**
  
7. That appellant, being aggrieved of impugned notification dated: 04.04.2019 and not considering his departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

**G R O U N D S:**

- A. That impugned Notification dated: 04.04.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
  
- B. That the appellant has neither been treated in accordance with law nor he has been provided equal protection of law, rather he has not been provided fair opportunity to defend himself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.
  
- C. That neither regular enquiry was conducted into the guilt of the appellant nor he has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterem-partem.
  
- D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.
  
- E. That appellant has served the department with zeal, devotion and to the best of his abilities, without affording a single opportunity of

complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

**I. 2011 SCMR 1581**

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

**II. 2004 SCMR 303**

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

**III. 2016 SCMR 1299**

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

**IV. 2010 PLD SC 483**

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

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

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 04.04.2019 of

respondent No.2 alongwith Pre and Post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, hence be set at naught and appellatant may be reinstated in service with all back benefits, in the best interest of justice and equity.

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

*[Signature]*

Appellant

Through

Amin ur Rehman Yusufzai

*[Signature]*

Sajjad Mehsud

&

*[Signature]*

Khalid Khan

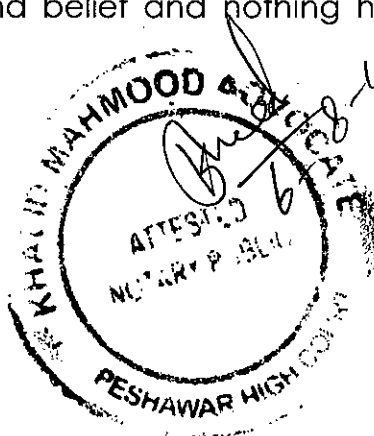
Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019

**VERIFICATION:**

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



*[Signature]*

Deponent

5

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR**

C.M No.\_\_\_\_/2019

In

Service Appeal No.\_\_\_\_/2019

Abdul Hai ..... **Appellant**

**....VERSUS....**

Govt of Khyber Pakhtunkhwa & 02 others ..... **Respondents**

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

Respectfully Sheweths-

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

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



Appellant

Through

**Amin ur Rehman Yusufzai**

**Sajjad Mehsud**

&

**Khalid Khan**

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

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019

A No 958/2019  
Ishfaq Ahmad vs Govt



06.09.2019

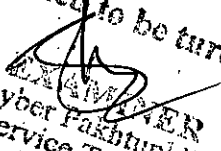
Counsel for the appellant present.

Contends that through notification dated 04.04.2019 the respondent No. 2/Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar "disowned" the appointment/adjustment notification of the appellant ostensibly on the ground that at the time of initial appointment the appellant had provided fake/bogus documents. Even the appointment order itself was not genuine. It was argued that while dispensing with the service of appellant the respondents did not resort to mandatory departmental proceedings and the appellant was not provided with any opportunity of putting forth his defence. The respondents did not care to issue any show cause notice nor a proper/regular enquiry was conducted before issuing of impugned notification.

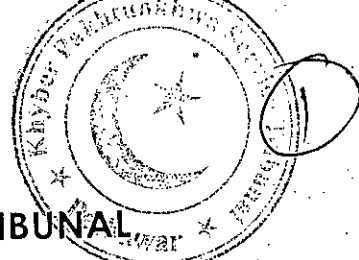
In view of available record and arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.11.2019 before S.B.

  
Chairman

Certified to be true copy

  
Chairman  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 12-9-19  
Number of Words 800  
Copying Fee 10/-  
Urgent 4/-  
Total 14/-  
Name of Copyist [Signature]  
Date of Completion of Copy 12-9-19  
Date of Delivery of Copy 12-9-19



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 958/2019/1045  
Dialy No.

Dated: 25/7/19

Ishfaq Ahmad S/O Aqal Raziq, Ex-SST (Gen),  
R/O Mohalla Bayaban, PO Pabbi, Tehsil & District Nowshera.

Appellant

....VERSUS....

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

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

NOTIFICATION ENDORSEMENT NO.5623-28, DATED: 04.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 11.02.2010, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED.

Filed to-day  
Registrar  
25/7/19

PRAYER-IN-APPEAL:

On Acceptance of Instant Appeal, the Impugned Notification dated 04.04.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, Hence, be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Respectfully Sheweth:

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of District Nowshera.  
(Copy of CNIC, is attached as Annexure "A")
2. That appellant obtained Master Degree, in the year 2009, from University of Peshawar and having passed B.Ed & M.Ed Degree Courses from University of Peshawar.  
(Copies of CV and Educational Testimonials, are attached as Annexure "B" & "C", respectively)
3. That appellant was appointed by the competent authority, as SST (BPS-16), on contract basis, for a period of one year, vide Notification Endorsement No.5141-5197/A-14/SST/M&F/Contract 1 year, dated: 16.09.2008.  
(Copy of Notification dated: 16.09.2008, is attached as Annexure "D")

Certified to be true copy

SEAL  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar



6

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR**

C.M No.\_\_\_\_/2019  
In  
Service Appeal No.\_\_\_\_/2019

Abdul Hai ..... **Appellant**

**....VERSUS....**

Govt of Khyber Pakhtukhwa & 02 others ..... **Respondents**

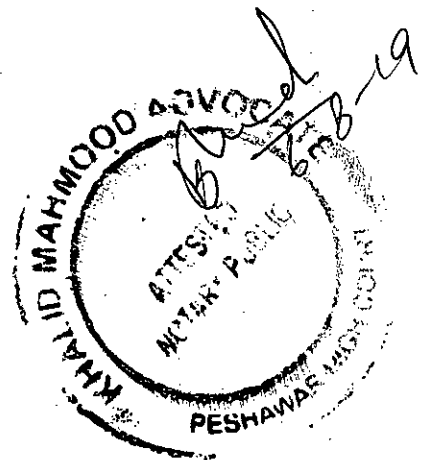
**AFFIDAVIT**

I, Abdul Hai S/o Muhammad Tayyeb, Ex-SST (Gen), R/O Village Sharif Khana, P.O Loisam Tehsil, Nawagai, Tribal District Bajour, do hereby solemnly affirm declare on oath that the contents of the accompanying '**Petition**' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

**DEPONENT**  
CNIC #: 21105-8323497-1

**Amin-ur-Rehman Yusufzai**  
Advocate, Peshawar



⑤

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR**

Service Appeal No. \_\_\_/2019

Abdul Hai ..... **Appellant**

**....VERSUS....**

Govt of Khyber Pakhtunkhwa & 02 others ..... **Respondents**

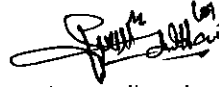
**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Abdul Hai S/o Muhammad Tayyeb, Ex-SST (Gen),  
R/O Village Sharif Khana, P.O Loisam Tehsil, Nawagai, Tribal District Bajour.

**RESPONDENTS:**

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



Appellant

Through

**Amin ur Rehman Yusufzai**



**Sajjad Mehsud**

&

  
**Khalid Khan**

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

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019

ANNEX A

(B)

**PAKISTAN** National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN

Name: Abdul Hai


Father Name: Mohammad Tayyeb

Gender: M Country of Stay: Pakistan

Identity Number: 21105-8323497-1 Date of Birth: 16.04.1983

Date of Issue: 11.04.2013 Date of Expiry: 11.04.2020

Holder's Signature



For High Court / Service Tribunal Case only

21105-8323497-1

برجہاد پبلک سروسز: ڈاک خانہ لوی، سہ شریف خانہ، تحصیل  
نوابی، ضلع راجڑ، پنجاب

سٹیشن پبلک سروسز: ڈاک خانہ لوی، سہ شریف خانہ، تحصیل  
نوابی، ضلع راجڑ، پنجاب

101471016054

Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیڈیکس میں ڈال دیں

For HC / Service Tribunal case only

ATTESTED

ANNEX B

(9)

**MIAN ABDUL HAI S/O Mohammad Tayyeb**

CNIC 21105-8323497-1

Date of Birth: 16/04/1983

Village Sharif khana Post officer Loism Tehsil Nawagai District Bajaur.

Email: haibjr.fata@gmail.com

Cell: 0301-8177557/03003009554

**Personal Experiences.**

I have worked as a SST (G) from 25/01/2010 up to 04/04/2019. Before it I have worked with National and International Organization on different Position as in Merlin International as a Team Leader, Norwegian Refugee Council (NRC) as Field Officer, Hujra a Village Support Organization as a Monitoring Officer and having also the experiences of Journalism as a Field Facilitator in Radio of Pakistan etc. etc.

**ACADEMIC QUALIFICATION**

| Name of Degree                                | College/<br>University       | Session | Roll No.     | Obtain/<br>receiving Marks |
|---|------------------------------|---------|--------------|----------------------------|
| M.A (Journalism<br>and mass<br>communication) | University of<br>Peshawar    | (2005)  | 5124 Regular | 622/1100                   |
| M.A (Urdu)                                    | Islamia College<br>Peshawar  | 2014    | 2666         | 501/1100                   |
| M.ED  | (Open<br>University)         | 2016    | BC665694     | 790/1200                   |
| B.ED  | Open University              | 2007    | R686735      | 62%                        |
| Health<br>Technology                          | Medical Faculty<br>Peshawar. | 2008    | 20Regular    | 747/1400                   |
| C.T   | (Open<br>University)         | 2004    | M 615150     | 64%                        |

**Computer**

- Diploma in Information Technology (D.I.T)
- Automation, MS Office, MS World, MS Excel, MS Power Point, MS

**LANGUAGES**

- English
- Urdu
- Pashto

**ATTESTED**

Serial No. 000396

Reg. No. 2013-PC-961

CNIC # 21105-8323497-1

Session: 2012-14

Date of Declaration  
of Result: 26/12/2014

Code: ICP/14/MA/UR-399

*Amir*  
Controller of  
Examinations

# Islamia College Peshawar

Pakistan



Mr./Ms. ABDUL HAI Son/Daughter of MOHAMMAD TAYEB

having fulfilled all the conditions required by the University has been admitted  
to the Degree of

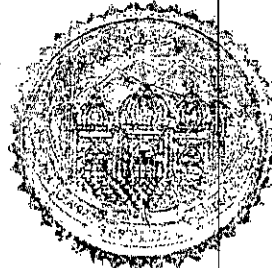
**Master of Arts / ~~XXXXXX~~**

in the subject of Urdu

in 2nd Division

The examination was taken as ~~XXXX~~ / in parts

*[Signature]*  
Registrar



*[Signature]*  
Vice Chancellor

ATTESTED

ANNEX 10

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar (Pakistan)

Session ANNUAL 2005

ABDUL FAI

SON

of

MUHAMMAD TAYEB

and a student/private candidate of

UNIVERSITY OF PESHAWAR

having passed the prescribed examination held in

AUGUST, 2005

is this day admitted by the University of Peshawar to the Degree of

## Master of Arts

In

JOURNALISM & MASS COMMUNICATION

In

SECOND

Division

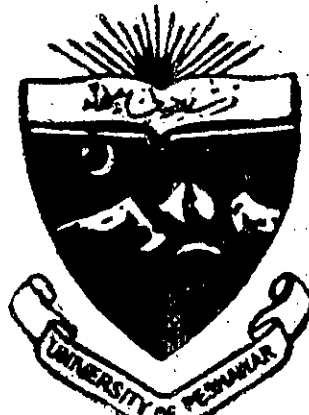
The Examination was taken as a whole / in parts

Serial No. 053281

Registered No. 2001-PB-1895

Roll No. 5124

Result Declared on 27th FEB, 2006



*Makul Ahmad*

Registrar

Countersigned

*[Signature]*

Vice-Chancellor

ATTESTED

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بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar (Pakistan)

SESSION ANNUAL 2003

ABDUL HAI

Son / ~~Daughter~~ of

MUHAMMAD TAYEB

and a student / ~~private candidate~~ of

GOVT. DEGREE COLLEGE KHAR BAJAUR

having passed the prescribed examination held in JUNE 2003

is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Arts

in SECOND Division

The examination was taken as a whole / ~~in parts~~

Serial No. 103387

Registration No. 2001-KB-1895

Roll No. 27719

Result declared on OCTOBER 11, 2003



ATTTESTED

*[Signature]*  
Registrar

Countersigned

*[Signature]*

Vice-Chancellor

Al-Lama Bajal Open University  
Islamabad

Serial No 86239

13



Certified that *Mr/Ms* **ABDUL HAI**

*Son/Daughter of* **MOHAMMAD TAYAB**

*Registration No.* **02 ABR 0084** *Roll No.* **M 615150**

*Semester* **Spring 2003** *having met all the requirements*  
*under the semester system is this day awarded the*

## Certificate of Teaching

*He/She has secured* **64 %** *marks*  
*and has been placed in* **B** *grade*

*Attested*  
*Principal*  
Govt. High School  
Loisam Bajaur Agency



Result declared on: **May 06, 2004**

Date of issue: **March 18, 2008**

*[Signature]*  
Controller of Examinations



13A

The detail of courses passed is as under

| Course code | Title of the course                  | Percentage of Marks obtained |
|-------------|--------------------------------------|------------------------------|
| 631         | Dimensions in Education              | 64                           |
| 632         | Educational Psychology               | 56                           |
| 633         | School Organization                  | 77                           |
| 634         | English Its Teaching                 | 55                           |
| 638         | Teaching Strategies Evaluation       | 58                           |
| 612         | Practical Workshop Teaching Practice | 73                           |
| 694         | Teaching of Urdu                     | 70                           |
| 605         | Teaching of Social Studies           | 57                           |
| 635         | Islamiat & Its Teaching              | 66                           |

Total credit hours **XXX**  
Total credits AIOU **5 Full Credits**  
First semester: **Autumn 2002**

Obtained / Total marks **576 / 900**  
Cumulative grade point average **XXX**  
Final semester **Spring 2003**

| Grading Scheme |          |
|----------------|----------|
| 80% and above: | A+ grade |
| 70% to 79%     | A grade  |
| 60% to 69%     | B grade  |
| 50% to 59%     | C grade  |

*[Handwritten signature]*

S.N<sup>o</sup> 11494

Roll No. 12345

14

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

## Saidu Sharif, Swat N.W.F.P. Pakistan

### Secondary School Certificate Examination

SESSION 2008 (ANNUAL/SUPPLEMENTARY)

THIS IS TO CERTIFY THAT ABDUL HAI

Son/Daughter of MOHAMMAD TAYAB

and a student of BAJAUR AGENCY

has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education, Saidu Sharif, Swat held in 1998 200 as a *Regular/Private candidate*. He/She obtained 525 Marks out of 850 and has been placed in Grade B Representing VERY GOOD

The candidate passed in the following subjects:

- |            |                     |              |            |
|------------|---------------------|--------------|------------|
| 1. English | 3. Islamiyat        | 5. MATHS     | 7. PHYSICS |
| 2. Urdu    | 4. Pakistan Studies | 6. CHEMISTRY | 8. BIOLOGY |

Date of birth according to admission form is SIXTEENTH APRIL  
one thousand nine hundred and EIGHTY THREE (16-04-1983)

Asstt. Secretary

Secretary

This certificate is issued without duplication or erasure.

Altes...  
Loisan

15

# Allama Iqbal Open University Islamabad



Serial No. 182381

Certified that Mr. / Ms. **ABDUL HAI**

Son / Daughter of **MOHAMMAD TAYAB**

Registration No: **02ABR0084** Roll No: **R686735**

having successfully completed the prescribed requirements  
in semester **SPRING 2006** is awarded the degree of

## Bachelor of Education (B.Ed)

He / She has secured **62** % marks and has been placed in **B** grade.

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: **January 25, 2007**

Date of Issue: **July 24, 2013**

  
**ATTESTED**

ANNEX D<sup>s</sup>

(16)

**OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP, PESHAWAR**

**NOTIFICATION**

In pursuance of the powers conferred under section 25 of the NWFP Civil Servant Act, 1973 the competent authority is pleased to re-appoint the following Male/Female SST (B-16) on contract basis as a stop-gap arrangements for a period of one year w.e.f. the date of assumption of charge or till the availability of selectees of the NWFP Public Service Commission / Departmental Selection Committee whichever is earlier:-

| Sr | Name                | Father Name     | Subject | Place of Posting               |
|----|---------------------|-----------------|---------|--------------------------------|
| 1  | Muhammad Javed Khan | Mir Qalam Shah  | General | GHS Mainz Garhi Orakzai Agency |
| 2  | Maqsood Ahmad Khan  | Lal Khan        | General | GHS Swaro Kooto Orakzai Agency |
| 3  | Abdul Hai           | Muhammad Tayyab | General | GMS Dippa Orakzai Agency       |
| 4  | Naheed Ullah        | Atta Ullah Jan  | General | GHS Jalaka Mela Orakzai Agency |

**Terms and Conditions**

1. The appointment of the above candidates will be on contract basis for the period of one year from the date of assumption of charge till the arrival of the selectees of the NWFP Public Service Commission/Departmental Selection Committee, whichever is earlier.
2. They will draw Pay in BPS-16.
3. No TA/DA is allowed.
4. If they want to resign from the service before expiry of the contract, they will have to serve one month notice in advance failing which they will have to deposit prior notice to the appointing authority one month pay in lieu of such notice, in the Government Treasury.
5. Their appointments have been made for specific schools, so shall not make any request for transfer from the School where they are posted. In case in case of such occurrence, their service shall stand terminated.
6. They should join their posts within 15-days of the issue of this notification. The Executive District Officer, Elementary & Secondary Education concerned, should furnish certificate to the effect that the candidates have joined the post or otherwise within 15-days of the issue of this Notification.
7. They shall execute an agreement with the Government before taking over charge, signed by the concerned EDOs Elementary & Secondary Education NWFP, on behalf of the Government/Director (E&SE).
8. They will not be entitled for any pension or gratuity for the service rendered by them on contract basis and shall not claim regularization for their contract service.
9. Charge report in duplicate should be submitted to all concerned.
10. Their service shall be terminated if they violate any provision of the terms and conditions specified in the agreement Bond/Dead.
11. They shall not be entitled to perform any examination duty of the BISEs/University/RDE, NWFP, during the current contract period.

Director  
Elementary & Secondary  
Education, NWFP, Peshawar


Endst No. 5135-5197 /A-14/SST/M&F/Contract One Year/

Dated: 25 / 11 /2008

**Copy of the above is forwarded to..**

1. Accountant General, NWFP Peshawar
2. Director of Education, FATA, NWFP Peshawar
3. Distt: Accounts Officers concerned
4. Director Elementary & Secondary Education NWFP, Peshawar
5. Executive District Officers (E&SE) concerned
6. Principals/Head Masters/Head Mistress concerned
7. SST concerned
8. PS to the Minister for Education NWFP
9. PS to Secretary to Govt: of NWFP
10. All Chairman BISE/Registrars of University in NWFP, with the request to comply with the above condition as at S.No
11. PA to Director (E&SE) Local Office
12. Master File

**ATTESTED**

  
Deputy Director (Estab:)  
Elementary & Secondary  
Education, NWFP, Peshawar

Abdul Hai  
9-63

ANNEX

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP, PESHAWAR

NOTIFICATION

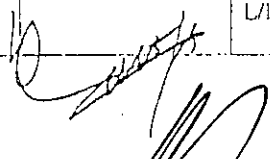
The competent authority has been pleased to regularize the services of the following Adhoc/contract employees against the post of SST (M) (BPS-16) with effect from 1-1-2009, under the NWFP Employees (Regularization of services) Act, 2009 on the terms & conditions given at the end of this Notification:-

| S.No. | Name of SST      | Father's name       | School address                    | No. & date of the current contract apptt. order |
|-------|------------------|---------------------|-----------------------------------|---|
| 1     | Muhammad Sultan  | Nowsher Khan        | GHS Barkhelzo<br>Bajaur Agency    | No.5139-5197 dated<br>16-9-2008                 |
| 2     | Zahid Ahmad      | Qazi Muhammad       | GHS Shingar Gul<br>Bajaur Agency  | No.5139-5197 dated<br>25-11-2008                |
| 3     | Khush Namyar     | Walayat Khan        | GHS Pashad<br>Bajaur Agency       | No.5139-5197 dated<br>25-11-2008                |
| 4     | Aurang Zeb       | Bahadar Khan        | GHS Kamadara<br>Bajaur Agency     | No.5139-5197 dated<br>16-9-2008                 |
| 5     | Battullah        | Said Ghulam         | GHS Raghagan<br>Bajaur Agency     | No.5139-5197 dated<br>16-9-2008                 |
| 6     | Fazal Ghani Khan | Waris Khan          | GMS Naraza<br>Bajaur Agency       | No.5139-5197 dated<br>16-9-2008                 |
| 7     | Bakht Munir      | Musanif Khan        | GMS Bado<br>Bajaur Agency         | No.5139-5197 dated<br>16-9-2008                 |
| 8     | Muhammad Imran   | Shahabuddin         | GHS Kotkai<br>Bajaur Agency       | No.5139-5197 dated<br>25-11-2008                |
| 9     | Bakht Zada       | Sher Hassan         | GMS W/Chakiki<br>Bajaur Agency    | No.5139-5197 dated<br>25-11-2008                |
| 10    | Asadullah        | Abidullah           | GMS Tarkhu<br>Bajaur Agency       | No.5139-5197 dated<br>25-11-2008                |
| 11    | Ihsanullah       | Shahabuddin         | GHS Shingar Gul<br>Bajaur Agency  | No.5139-5197 dated<br>25-11-2008                |
| 12    | Ekan Muhammad    | Bashir Ahmad        | GMS Charkand<br>Bajaur Agency     | No.5139-5197 dated<br>16-9-2008                 |
| 13    | Nowshad Khan     | Badshah Min<br>Khan | GHS Batwar<br>Bajaur Agency       | No.5139-5197 dated<br>16-9-2008                 |
| 14    | Khan Gul         | Mir Rehman          | GHS Batwar<br>Bajaur Agency       | No.5139-5197 dated<br>16-9-2008                 |
| 15    | Abdul Majeed     | Sadullah            | GMS Tangi<br>Bajaur Agency        | No.5139-5197 dated<br>25-11-2008                |
| 16    | Muhammad Nazcer  | Gran Said           | GMS M.Dara<br>Bajaur Agency       | No.5139-5197 dated<br>25-11-2008                |
| 17    | Muhammad Ayub    | Mamoor Khan         | GHS Topmanda<br>Bajaur Agency     | No.5139-5197 dated<br>25-11-2008                |
| 18    | Rohul Amin       | Hakim Said          | GHS Mata Qala<br>Bajaur Agency    | No.5139-5197 dated<br>25-11-2008                |
| 19    | Umar Gul         | Saifur Rehman       | GMS Danishkool<br>Mohmand Agency  | No.5139-5197 dated<br>25-11-2008                |
| 20    | Farman Ali       | Qasim Khan          | GHS Pandilai<br>Mohmand Agency    | No.5139-5197 dated<br>25-11-2008                |
| 21    | Zahid Hussain    | Sardar              | GHS Pandilai<br>Mohmand Agency    | No.5139-5197 dated<br>25-11-2008                |
| 22    | Akbar Ali        | Abdul Baqi Jan      | GMS Suran<br>Mohmand Agency       | No.5139-5197 dated<br>25-11-2008                |
| 23    | Muhammad Nasir   | Hawas Khan          | GMS Ashraf Abad<br>Mohmand Agency | No.5139-5197 dated<br>25-11-2008                |
| 24    | Bheba Khan       | Umar Ali            | GMS Gulbaz<br>Mohmand Agency      | No.5139-5197 dated<br>25-11-2008                |
| 25    | Altan Alam       | Gul Aman            | GMS Adin Khet<br>Mohmand Agency   | No.5139-5197 dated<br>25-11-2008                |
| 26    | Khan Said        | Umar Ali            | GHS Nahqi<br>Mohmand Agency       | No.5139-5197 dated<br>25-11-2008                |

ATTESTED

Head Master  
G.H.S. Mussa Darra  
F.R. Peshawar.

|    |                      |                    |                                      |                               |
|----|----------------------|--------------------|--------------------------------------|-------------------------------|
| 59 | Muhammad Noor        | Ghani Sarwar       | GHS, Biland Khel Orakzai Agency      | No.5139-5197 dated 25-11-2008 |
| 60 | Muhammad Javid Khan  | Mir Qadam Shah     | GHS, Manz Garmi Orakzai Agency       | No.17507-30 dated 6-11-2008   |
| 61 | Maqsood Ahmad Khan   | Lal Khan           | GHS Swaro Koot Orakzai Agency        | No.5139-5197 dated 25-11-2008 |
| 62 | Naheed Ullah         | Atta Ullah Jan     | GHS, Jalaka Mela Orakzai Agency      | No.5139-5197 dated 25-11-2008 |
| 63 | Abdul Hai            | Muhammad Tayyeb    | GMS, Dippa Orakzai Agency            | No.5139-5197 dated 25-11-2008 |
| 64 | Fareed-ur- Rehman    | Zar Pto Khan       | GMS, Sabzai Khel Orakzai Agency      | No.17507-30 dated 6-10-2008   |
| 65 | Inayat ullah         | Shah.Swar          | GHS, Ghiljo Orakzai Agency           | No.5139-5197 dated 16-9-2008  |
| 66 | Khushid Ali          | Mohd Aslam Khan    | GMS, Stara Kada Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 67 | Mansoor Ahmad        | Dil Baz Khan       | GMS, Sapri Peroz Khel Orakzai Agency | No.5139-5197 dated 25-11-2008 |
| 68 | Muhammad Zahid       | Mohd Azam Khan     | GHS, Mandali Orakzai Agency          | No.5139-5197 dated 25-11-2008 |
| 69 | Umar Ali             | Mir Kalam Khan     | GMS, Inzar Pati Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 70 | Fazal Karim          | Abdul Hakim        | GHS, Swaro koot Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 71 | Ihteramul Haq        | Sher Ayaz Khan     | GHS, Bazeed Khel Orakzai Agency      | No.17507-30 dated 6-10-2008   |
| 72 | Surat Khan           | Siraj Ud Din       | GHS, Palossi Orakzai Agency          | No.5139-5197 dated 25-11-2008 |
| 73 | Taq weenul Haq       | Abdul Ghani        | GHS, Mandali Orakzai Agency          | No.5139-5197 dated 25-11-2008 |
| 74 | Ghulam Dasta Gerr    | Ghulam Rasul       | GHS, Mishki Bazar Orakzai Agency     | No.5139-5197 dated 25-11-2008 |
| 75 | Aurangzeb Khan       | Mukarab Khan       | GHS, Ghiljo Orakzai Agency           | No.5139-5197 dated 16-9-2008  |
| 76 | Asghar Khan          | Sana Ullah Khan    | GMS, Ghuz Ghar Orakzai Agency        | No.5139-5197 dated 25-11-2008 |
| 77 | Akher Zaman          | Mir Zaman          | GMS, Tooti Bagh Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 78 | Muhammad Imran       | Bahdar Nawaz       | GHS, Tooti Bagh Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 79 | Mohib Ullah Khan     | Sakhi Jan          | GMS, Wam Panra Orakzai Agency        | No.5139-5197 dated 25-11-2008 |
| 80 | Saeedullah w. Rehman | Modam Khan         | GMS, Gulistan Orakzai Agency         | No.5139-5197 dated 25-11-2008 |
| 81 | Sher Agha Khan       | Masood Khan        | GHS, Gulistan Orakzai Agency         | No.5139-5197 dated 25-11-2008 |
| 82 | Sharifullah          | Eid. Nawaz         | GHS, Sara Mela Orakzai Agency        | No.5139-5197 dated 25-11-2008 |
| 83 | Syed Mudassir Shah   | Syed Chan Bad Shah | GHS, Kurez Orakzai Agency            | No.5139-5197 dated 16-9-2008  |
| 84 | Abdur Rashid         | Syed Kamal         | GHS, Dara Dar Mamazai Orakzai Agency | No.5139-5197 dated 25-11-2008 |
| 85 | Fazal Hamid          | Sher Zaman         | GHS, Kurez Orakzai Agency            | No.5139-5197 dated 25-11-2008 |
| 86 | Abdul Malik Khan     | Abdul Wadood Khan  | GHS Avi Mala Orakzai Agency          | No.5139-5197 dated 25-11-2008 |
| 87 | Zahid Ullah          | FaizUllah Khan     | GHS, Manatoo Kurram Agency           | No.5139-5197 dated 25-11-2008 |
| 88 | Muhammad Israr Khan  | Ghaffar Khan       | GMS, Gawaki Kurram Agency            | No.5139-5197 dated 25-11-2008 |
| 89 | ZakirUllah           | Gul Amir Khan      | GHS, Manatoo Kurram Agency           | No.5139-5197 dated 25-11-2008 |
| 90 | Nasimullah Khan      | Ghulam Ali Khan    | GHS, Chappri L/Kurram Agency         | No.5139-5197 dated 25-11-2008 |

  
**ATTESTED**

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|    |                      |                    |                                      |                               |
|----|----------------------|--------------------|--------------------------------------|-------------------------------|
| 59 | Muhammad Noor        | Ghani Sarwar       | GHS, Biland Khel Orakzai Agency      | No.5139-5197 dated 25-11-2008 |
| 60 | Muhammad Javid Khan  | Mir Qadam Shah     | GHS, Manz Garhi Orakzai Agency       | No.17507-30 dated 6-11-2008   |
| 61 | Maqsood Ahmad Khan   | Lal Khan           | GHS, Swaro Koot Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 62 | Nahheed Ullah        | Atta Ullah Jan     | GHS, Jalaka Mela Orakzai Agency      | No.5139-5197 dated 25-11-2008 |
| 63 | Nashidullah          | Ahmad Khan         | GHS, Spider Orakzai Agency           | No.5139-5197 dated 25-11-2008 |
| 64 | Fareed-ur- Rehman    | Zar Pio Khan       | GMS, Sabzai Khel Orakzai Agency      | No.17507-30 dated 6-10-2008   |
| 65 | Inayat ullah         | Shah Swar          | GHS, Ghiljo Orakzai Agency           | No.5139-5197 dated 16-9-2008  |
| 66 | Khushid Ali          | Mohid Aslam Khan   | GMS, Stara Kada Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 67 | Mansoor Ahmad        | Dil Baz Khan       | GMS, Sapri Peraz Khel Orakzai Agency | No.5139-5197 dated 25-11-2008 |
| 68 | Muhammad Zahid       | Mohid Azam Khan    | GHS, Mandili Orakzai Agency          | No.5139-5197 dated 25-11-2008 |
| 69 | Umar Ali             | Mir Kalam Khan     | GMS, Tazar Pati Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 70 | Fazal Karim          | Abdul Hakim        | GHS, Swaro koot Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 71 | Ihteramul Haq        | Sher Ayaz Khan     | GHS, Bazeed Khel Orakzai Agency      | No.17507-30 dated 6-10-2008   |
| 72 | Surrat Khan          | Siraj Ud Din       | GHS, Palossi Orakzai Agency          | No.5139-5197 dated 25-11-2008 |
| 73 | Ihtaq weenul Haq     | Abdul Ghani        | GHS, Mandili Orakzai Agency          | No.5139-5197 dated 25-11-2008 |
| 74 | Ghulam Dasta Gerr    | Ghulam Rasool      | GHS, Mishri Bazar Orakzai Agency     | No.5139-5197 dated 25-11-2008 |
| 75 | Aurangzeb Khan       | Mukarab Khan       | GHS, Ghiljo Orakzai Agency           | No.5139-5197 dated 16-9-2008  |
| 76 | Asghar Khan          | Sana-Ullah Khan    | GMS, Ghuz Chhar Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 77 | Akher Zaman          | Mir Zaman          | GMS, Tooti Bagh Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 78 | Muhammad Imran       | Bahdar Nawaz       | GHS, Tooti Bagh Orakzai Agency       | No.5139-5197 dated 25-11-2008 |
| 79 | Mohib Ullah Khan     | Sakhi Jan          | GMS, Wam Panra Orakzai Agency        | No.5139-5197 dated 25-11-2008 |
| 80 | Saeedullah w. Rehman | Modam Khan         | GMS, Gulistan Orakzai Agency         | No.5139-5197 dated 25-11-2008 |
| 81 | Sher Agha Khan       | Masood Khan        | GHS, Gulistan Orakzai Agency         | No.5139-5197 dated 25-11-2008 |
| 82 | Sharifullah          | Eid Nawaz          | GHS, Sara Mela Orakzai Agency        | No.5139-5197 dated 25-11-2008 |
| 83 | Syed Mudassir Shah   | Syed Chan Pad Shah | GHS, Kurez Orakzai Agency            | No.5139-5197 dated 16-9-2008  |
| 84 | Abdur Rashid         | Syed Kamal         | GHS, Dara Dar Mamazai Orakzai Agency | No.5139-5197 dated 25-11-2008 |
| 85 | Fazal Hamid          | Sher Zaman         | GHS, Kurez Orakzai Agency            | No.5139-5197 dated 25-11-2008 |
| 86 | Abdul Malik Khan     | Abdul Wadood Khan  | GHS, Avi Mala Orakzai Agency         | No.5139-5197 dated 25-11-2008 |
| 87 | Zahid Ullah          | Faiz Ullah Khan    | GHS, Manatoo Kurram Agency           | No.5139-5197 dated 25-11-2008 |
| 88 | Muhammad Israr Khan  | Ghaffar Khan       | GMS, Gawaki Kurram Agency            | No.5139-5197 dated 25-11-2008 |
| 89 | Zakir Ullah          | Gul Amir Khan      | GHS, Manatoo Kurram Agency           | No.5139-5197 dated 25-11-2008 |
| 90 | Nasimullah Khan      | Ghulam Ali Khan    | GHS, Chappri L/Kurram Agency         | No.5139-5197 dated 25-11-2008 |

**ATTESTED**

Head Master  
G.H.S. Mussa Darra  
F.R. Peshawar.

|     |                         |                        |                                       |                                  |
|-----|-------------------------|------------------------|---------------------------------------|----------------------------------|
| 91  | Ibrahim Khan            | Ghulam Sardar          | GHS, Manatoo<br>Kurram Agency         | No.5139-5197 dated<br>16-9-2008  |
| 92  | Naimatullah             | Pasti Khan             | GHS, Makhezai<br>Kurram Agency        | No.1876-88 dated<br>24-10-2008   |
| 93  | Surat Khan              | Mir Rais Khan          | GHS, Bagan<br>Kurram Agency           | No.1876-88 dated<br>24-10-2008   |
| 94  | Muhammad Azim<br>Khan   | Ghazi Marjan           | GMS, Jalander<br>Kurram Agency        | No.5139-5197 dated<br>16-9-2008  |
| 95  | Noaman Khan             | Narrullah Jan          | GMS, Tindu<br>Kurram Agency           | No.5139-5197 dated<br>25-11-2008 |
| 96  | Younas                  | Muhammad Basir<br>Khan | GMS, Khuzina<br>Kurram Agency         | No.5139-5197 dated<br>25-11-2008 |
| 97  | Nazir Muhammad          | Noor Muhammad          | GHS, Bagan<br>Kurram Agency           | No.5139-5197 dated<br>16-9-2008  |
| 98  | Muhammad Ashraz<br>Khan | Noor Muhammad          | GHS, Bilyamin<br>Kurram Agency        | No.5139-5197 dated<br>25-11-2008 |
| 99  | Amanullah               | Sinazar Khan           | GHS, Bilyamin<br>Kurram Agency        | No.5139-5197 dated<br>25-11-2008 |
| 100 | Rafiqullah              | Afsar Khan             | GMS, Taradi<br>Kurram Agency          | No.5139-5197 dated<br>25-11-2008 |
| 101 | Noor Gul                | Guladot Khan           | GMS, Taudiobu<br>Kurram Agency        | No.5139-5197 dated<br>25-11-2008 |
| 102 | Fazal Karim             | Zari Khan              | GHS, Badama<br>Kurram Agency          | No.1876-88 dated<br>24-10-2008   |
| 103 | Samidullah              | Aziz Khan              | GMS, Dappa<br>Kurram Agency           | No.5139-5197 dated<br>25-11-2008 |
| 104 | Zakirullah              | Gul Amir Khan          | GHS, Manatoo<br>Kurram Agency         | No.5139-5197 dated<br>25-11-2008 |
| 105 | Muhammad Naem<br>Khan   | Ghafar Ali Khan        | GMS, Samkharak<br>Kurram Agency       | No.1876-88 dated<br>24-10-2008   |
| 106 | Farihaullah             | Rehmatullah            | GMS, Arwali kucramag<br>Kurram Agency | No.5139-5197 dated<br>25-11-2008 |
| 107 | Muhammad Aziz           | Ghazu Khan             | GHS, Ghuzaheri<br>Kurram Agency       | No.5139-5197 dated<br>25-11-2008 |
| 108 | Hanif Khan              | Mir Rais Khan          | GMS, Bazu<br>Kurram Agency            | No.5139-5197 dated<br>25-11-2008 |
| 109 | Gul Mir Khan            | Zalaf Khan             | GHS, Bughdi<br>Kurram Agency          | No.5139-5197 dated<br>25-11-2008 |
| 110 | Altahir Rehman          | Ghani-ur-Rehman        | GMS, Thundo<br>Kurram Agency          | No.5139-5197 dated<br>25-11-2008 |
| 111 | S. Ali Afzal            | S. Muhammad<br>Afzal   | GHS, Shingak<br>Kurram Agency         | No.5139-5197 dated<br>25-11-2008 |
| 112 | Arbab Hussain           | Sardar Hussain         | GHS Borki<br>Kurram Agency            | No.5139-5197 dated<br>25-11-2008 |
| 113 | Aminullah               | Sher Bahadur<br>Khan   | GHS, Mahoora<br>Kurram Agency         | No.5139-5197 dated<br>25-11-2008 |
| 114 | Jannat Mir Khan         | Molve Khan             | GHS, Tari Mingal<br>Kurram Agency     | No.5139-5197 dated<br>25-11-2008 |
| 115 | Arif Hussain            | Ali Janan              | GHS Alizai<br>Kurram Agency           | No.5139-5197 dated<br>16-9-2008  |
| 116 | Shakeel Ahmad           | Muhammad Tariq         | GMS Shair Kot NWA                     | No.5139-5197 dated<br>16-9-2008  |
| 117 | Noor Ayub               | Matloob Khan           | GHS Taj Mohd Shera<br>NWA             | No.5139-5197 dated<br>16-9-2008  |
| 118 | Qabool<br>Muhammad      | Rasool<br>Muhammad     | GHS Taj Mohd Shera<br>NWA             | No.5139-5197 dated<br>16-9-2008  |
| 119 | Shahuddin               | Muhammad Kooz          | GMS Ahmad Khel<br>NWA                 | No.5139-5197 dated<br>16-9-2008  |
| 120 | Wali Rehman             | Muhammad Gul           | GHS Datta Khel NWA                    | No.5139-5197 dated<br>16-9-2008  |
| 121 | Muhammad Imran<br>Shah  | Muhammad Zahir<br>Shah | GHS, Land NWA                         | No.5139-5197 dated<br>16-9-2008  |
| 122 | Abdul Baqi Jan          | Muhammad Mir<br>Jan    | GMS, Mirat Khan NWA                   | No.5139-5197 dated<br>25-11-2008 |
| 123 | Muhammad Irfan          | Haji Gul Hameed        | GMS, Paryat NWA                       | No.5139-5197 dated<br>16-9-2008  |

**ATTESTED**

Head Master,  
G.H.S. Mussa Darra



|     |                      |                 |                          |                               |
|-----|----------------------|-----------------|--------------------------|-------------------------------|
| 124 | Hazrat Bilal         | Muhammad Ayub   | GHS, Sadaqi Kot NWA      | No.5139-5197 dated 16-9-2008  |
| 125 | Samirullah           | Sarfraz Khan    | GMS Kohi Pari NWA        | No.5139-5197 dated 16-9-2008  |
| 126 | Afzal Noor           | Muhammad Noor   | GHS, Tall Village NWA    | No.5139-5197 dated 16-9-2008  |
| 127 | Baitullah            | Nek Bahadar     | GMS Dossali Village NWA  | No.5139-5197 dated 16-9-2008  |
| 128 | Zahoor Ahmad         | Neer Muhammad   | GMS Manooey NWA Khel     | No.5139-5197 dated 25-11-2008 |
| 129 | Noor Zali Khan       | Saifur Rehman   | GMS Nawab Kot NWA        | No.5139-5197 dated 25-11-2008 |
| 130 | Irshadullah          | Haji Bat Khan   | GHS Sadaqi Kot NWA       | No.5139-5197 dated 25-11-2008 |
| 131 | Muhammad Daud        | Shareem Gul     | GHS Mami Rugha NWA       | No.5139-5197 dated 16-9-2008  |
| 132 | Azmatullah           | Saleh Khan      | GMS, Puryat NWA          | No.5139-5197 dated 25-11-2008 |
| 133 | Hasanullah           | Eid Mar Jan     | GHS Tall Village NWA     | No.5139-5197 dated 25-11-2008 |
| 134 | Samidullah           | Muhammad Jalil  | GHS Pir Sahid Jan NWA    | No.5139-5197 dated 25-11-2008 |
| 135 | Said Muhammad        | Qadeem Khan     | GHS Shamozan NWA         | No.5139-5197 dated 16-9-2008  |
| 136 | Muhammad Noor Din    | Ahmad Din       | GMS Payo Jan NWA         | No.5139-5197 dated 16-9-2008  |
| 137 | Muhammad Issa Khan   | Mir Jaleb Khan  | GHS Spinwam NWA          | No.5139-5197 dated 25-11-2008 |
| 138 | Hikmatullah          | Noor Nawaz Khan | GHS Abass Khel Fangi SWA | No.5139-5197 dated 25-11-2008 |
| 139 | Naimatullah          | Muhammad Iqbal  | GHS Shahoor SWA          | No.5139-5197 dated 25-11-2008 |
| 140 | Attaullah            | Zaidullah Khan  | GHS Kari kot SWA         | No.5139-5197 dated 25-11-2008 |
| 141 | Muhammad Tariq       | Sher Sali Khan  | GMS Wacha Dana SWA       | No.1876-88 dated 24-10-2008   |
| 142 | Manzoorullah         | Sardar Khan     | GHS Ladha SWA            | No.5139-5197 dated 25-11-2008 |
| 143 | Sharyat Khan         | Qismat Khan     | GMS Tanai SWA            | No.5139-5197 dated 25-11-2008 |
| 144 | Ihsanullah           | Raza Khan       | GMS Dab Kot SWA          | No.5139-5197 dated 25-11-2008 |
| 145 | Abdur Razaq          | Noor Nawaz Khan | GMS Muhammad Yar Kot SWA | No.5139-5197 dated 25-11-2008 |
| 146 | Muhammad Musa Khan   | Said Muhammad   | GHS Shakai SWA           | No.5139-5197 dated 16-9-2008  |
| 147 | Masud-ur-Rehman      | Muhammad Hanan  | GHS Shakai SWA           | No.5139-5197 dated 25-11-2008 |
| 148 | Hassam-ud-din Khan   | Aurangzeb Khan  | GHS Tiarza SWA           | No.5139-5197 dated 25-11-2008 |
| 149 | Muhammad Roshan      | Muhammad Hanan  | GHS Chaleraai Makin SWA  | No.5139-5197 dated 25-11-2008 |
| 150 | Muhammad Ashraf Khan | Afsar Khan      | GMS Angoor Adda SWA      | No.5139-5197 dated 25-11-2008 |
| 151 | Sheryar Khan         | Bostan Khan     | GHS Azan Warsak SWA      | No.5139-5197 dated 25-11-2008 |
| 152 | Zia-ul-Haq           | Muhammad Lugman | GMS Sultan Kot SWA       | No.5139-5197 dated 25-11-2008 |
| 153 | Muhammad Ishaq       | Sakhi Rehman    | GHS Nano SWA             | No.5139-5197 dated 25-11-2008 |
| 154 | Abdur Rahim          | Dawlat Khan     | GHS Nano SWA             | No.5139-5197 dated 25-11-2008 |
| 155 | Muhsenullah          | Misir Bagh Jan  | GHS Ashkar Kot SWA       | No.5139-5197 dated 25-11-2008 |
| 156 | Zahid Noor Shah      | Ayaz Khan       | GMS Zeri Wam SWA         | No.5139-5197 dated 25-11-2008 |

**ATTESTED**

Head Masier  
G.H.S. Mussa Darra  
P. R. Peshawar.

|     |                      |                       |                           |                               |
|-----|----------------------|-----------------------|---------------------------|-------------------------------|
| 157 | Asghar Khan          | Habib Noor            | GMS Azdi Khan Makin SWA   | No.5139-5197 dated 25-11-2008 |
| 158 | Munawar Khan         | Hakim Khan            | GMS Toor Raghzai SWA      | No.5139-5197 dated 25-11-2008 |
| 159 | Manzoorullah         | Muhammad Abdul Hai    | GHS Kanigurram SWA        | No.5139-5197 dated 25-11-2008 |
| 160 | Zahidullah           | Noor Daraz Khan       | GHS Spinkai SWA           | No.5139-5197 dated 25-11-2008 |
| 161 | Amir Rehman          | Mohibullah            | GHS Shinkai SWA           | No.5139-5197 dated 25-11-2008 |
| 162 | Inayatullah          | Zahoor-ud-din         | GHS Sad Khan Kot SWA      | No.5139-5197 dated 25-11-2008 |
| 163 | Ahmed-ud-din         | Bahr-e-Aman           | GMS Tatai Langer Khel SWA | No.5139-5197 dated 25-11-2008 |
| 164 | Pir Muhammad         | Muhammad Khan         | GMS Sina Tiza SWA         | No.1876-88 dated 24-10-2008   |
| 165 | Manzoor Ahmad Khan   | Afsar Khan            | GHS Sam SWA               | No.5139-5197 dated 25-11-2008 |
| 166 | Saif-ur-Rehman       | Qazi-ur-Rehman        | GHS Zad Rana SWA          | No.5139-5197 dated 25-11-2008 |
| 167 | Shakirullah          | Umar Khan             | GHS Spin SWA              | No.5139-5197 dated 25-11-2008 |
| 168 | Hayat Hussain        | Muhammad Yousaf       | GHS Spin SWA              | No.5139-5197 dated 25-11-2008 |
| 169 | Hazrat Hussain       | Qasim Khan            | GHS Wana SWA              | No.5139-5197 dated 25-11-2008 |
| 170 | Nassrullah           | Attaullah Khan        | GHS Kari Kot SWA          | No.5139-5197 dated 25-11-2008 |
| 171 | Noor Khan            | Ghausia Din           | GHS Chagmalai SWA         | No.5139-5197 dated 25-11-2008 |
| 172 | Sajjad Haider        | Muzammil Khan         | GHS Janata SWA            | No.1876-88 dated 24-10-2008   |
| 173 | Rafiqullah           | Afzar Khan            | GHS Janata SWA            | No.5139-5197 dated 25-11-2008 |
| 174 | Sajjad Ahmad         | Muhammad Nowsher Khan | GHS Kot Kai SWA           | No.5139-5197 dated 25-11-2008 |
| 175 | Muhammad Rehman      | Gul Sade Jan          | GHS Chagmalai SWA         | No.5139-5197 dated 25-11-2008 |
| 176 | Abdur Rauf           | Abdul Shakoor         | GHS Sad Khan Kot SWA      | No.5139-5197 dated 25-11-2008 |
| 177 | Muhammad Shahid Khan | Aslam Khan            | GHS Shinkai SWA           | No.5139-5197 dated 25-11-2008 |
| 178 | Asmatullah           | Muhammad Iqbal        | GHS Chalarai Makin SWA    | No.5139-5197 dated 25-11-2008 |
| 179 | Saifullah            | Mazhar-ud-din         | GHS Zad Rana SWA          | No.5139-5197 dated 25-11-2008 |
| 180 | Arshadullah Khan     | Muhammad Zaman        | GMS Khan Kot SWA          | No.5139-5197 dated 25-11-2008 |
| 181 | Zain-ud-din          | Sikander Jan          | GMS Ahmad Gul Kalai SWA   | No.5139-5197 dated 25-11-2008 |
| 182 | Abdus Samad          | Fazal Khan            | GHS Abbas Khel Tangi SWA  | No.5139-5197 dated 25-11-2008 |
| 183 | Muhammad Zaman       | Amir Zaman            | GMS Ganra Haibat Khel SWA | No.5139-5197 dated 25-11-2008 |
| 184 | Tariq Waseem         | Asmatullah            | GHS Pir Tangi FR Tank     | No.5139-5197 dated 25-11-2008 |
| 185 | Muhammad Farooq Khan | Mian Khan Gul         | GMS Neimat Khel FR Tank   | No.5139-5197 dated 25-11-2008 |
| 186 | Samiullah            | Rehmatullah           | GHS Kirriwam FR Tank      | No.5139-5197 dated 25-11-2008 |
| 187 | Inamullah            | Ghulam Qasim          | GHS/Sobati Kaeh FR Tank   | No.5139-5197 dated 25-11-2008 |
| 188 | Mehmood-ur-Rehman    | Khan Zaman            | GHS Din Muhammad FR Tank  | No.5139-5197 dated 25-11-2008 |
| 189 | Muhammad Parvez      | Bostan                | GMS Baghul Jadid FR Tank  | No.1876-88 dated 24-10-2008   |

**ATTESTED**

Head Master  
G.H.S. Mussa Darra  
P. R. Peshawar

|     |                            |                         |                                 |                                  |
|-----|----------------------------|-------------------------|---------------------------------|----------------------------------|
| 190 | Asghar Khan                | Willayat Khan           | GHS Khirgi FR Tank              | No.5139-5197 dated<br>25-11-2008 |
| 191 | Muhammad Rashid            | Aqil Khan               | GHS Darazinda<br>FR D.I.Khan    | No.5139-5197 dated<br>25-11-2008 |
| 192 | Muhammad<br>Abdullah Umair | Muhammad Saad<br>Siraji | GMS Tsijree<br>FR D.I.Khan      | No.5139-5197 dated<br>16-9-2008  |
| 193 | Abdur Rashid Khan          | Ayaz Khan               | GHS Mir Azam Korona<br>FR- Tank | No.5139-5197 dated<br>25-11-2008 |

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Terms and conditions of their appointment

1. Their services will be considered as regular but without pension and gratuity in terms of Section-19 of NWFP, Civil Servants Acts, 1973 as amended vide NWFP, Civil Servants (Amendment) Act 2005. They will, however, be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
2. The seniority will be determined according to Section-4 of NWFP, Employees (Regularization of service) Act, 2009.
3. They will be required to furnish copies of all their certificates/degrees alongwith original receipts and photo stat copies thereof, pertaining to verification fee of the concerned examining Body (Board & University) to the Agency Education Officers concerned.
4. The Agency Education Officers concerned are directed not to release their pay until the verification of their documents.

Director  
Elementary & Secondary  
Education, NWFP Peshawar

Endst: No. 604-710 /A-14/SET(M) Regularization/FATA Dated Pesh: the 5/11/2010

1. Accountant General NWFP, Peshawar
2. Director of Education (FATA) NWFP, Peshawar
3. All Agency Education Officers concerned
4. All Agency Accounts Officers concerned
5. All Principals/ Headmasters concerned
6. Teachers concerned
7. PS to the Minister for E&SE NWFP, Peshawar
8. PS to the Secretary to Govt: of NWFP, E&SE Deptt:
9. PA to the Director E&SE NWFP, Peshawar.

Deputy Director (Establishment)  
E&SE NWFP, Peshawar.

*[Handwritten signature]*  
3/11/2010

*[Handwritten signature]*

Head Master  
G.H.S. Mussa Darrã  
F. B. Peshawar,

**ATTESTED**

94

MEDICAL CERTIFICATE

Name of Official ..... *Abdul Hai*

Caste or race ..... *Talhari*

Father's name ..... *Muhammad Taryab*

Residence ..... *Village Sharif Khana Teh nawa gai  
Teh and Dissi Bajwal Agency.*

Date of birth ..... *16. 4. 1983*

Exact height by measurement ..... *5' 6"*

Personal mark of identification ..... *NIL*

Signature of the Official ..... *[Signature]*

Signature of head office .....

Agency Education Officer  
Bakzal Agency at Hange  
Seal of Office

I do hereby certify that I have examined Mr. *Abdul Hai* candidate for  
employment in the Office of the *elementary and Secondary Education SST (G)*  
and can not discover that he had any disease communicable or other constitutional affection or bodily  
infirmary except *NIL*

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

..... His age according to his own statement ..... *30* year and by  
appearance about *Thirty only* years.

*[Signature]*  
Physician  
Standing Medical Board  
Police Service Hospital  
Peshawar

*[Signature]*  
MEDICAL SUPERINTENDENT  
Serving Medical Board  
Police Service Hospital  
Peshawar  
Civil Hospital

LEFT HAND THUMB AND FINGER

ATTESTED

IMPRESSION .....

*[Handwritten mark]*

**NOTIFICATION**

ANNEX F

95

1. WHERE AS: one Mr. Abdul Hai S/O Muhammad Tayyab who himself appointed/adjusted as SST (G) in GHS Tangi Charming District Bajaur vide Notification No. 684-710/A-14/SST(M)/Regularization/FATA dated 05/01/2010 and No. 365-615/A-1(General) fixed SST dated 06/01/2010 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mr. Abdul Hai S/O Muhammad Tayyab, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment/adjustment Notification No. 684-710/A-14/SST(M)/Regularization/FATA dated 05/01/2010 and No. 365-615/A-1(General) fixed SST dated 06/01/2010 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr. Abdul Hai S/O Muhammad Tayyab in the interest of Public Service.

5757-62

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. \_\_\_\_\_ dated 4-4-2019  
Copy forwarded to the:-

1. Deputy Commissioner, Tribal District Bajaur with the request to take legal action.
2. District Education Officer Tribal District Bajaur with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer Tribal District Bajaur to co-operate in the matter.
4. Head Master GHS Tangi Charming District Bajaur.
5. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
6. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

**ATTESTED**

Deputy Director (Estab)  
Merged Districts

جناب سیکرٹری E&SE ڈیپارٹمنٹ KP پشاور

ANNEX

96

محکمہ اپیل برخلاف نوٹیفیکیشن محررہ 4-4-2019 جس کی رو سے ڈائریکٹر صاحب E&SE کے ڈیپارٹمنٹ KP پشاور اپیلنٹ (Appilant) کے بھرتی کے احکامات بحیثیت SST محررہ 01-01-2009 کنٹریکٹ پر بھرتی ہوا اور بعد میں 06-01-2010 کو ریگولر ہوا کو ایک طرفہ طور پر جعلی و فرضی بتلا کر اپیلنٹ (Appilant) کو ملازم ماننے سے انکار کر دیا۔ استدعا: نوٹیفیکیشن محررہ 04-04-2019 مجاز یہ جناب ڈائریکٹر صاحب E&SE ڈیپارٹمنٹ KP پشاور کو کالعدم کر کے اپیلنٹ (Appilant) کو ملازمت پر تمام مراعات کے ساتھ بحال کیا جائے۔ جناب عالی!

1. یہ کہ Appilant ضلع باجوڑ کا مستقل و پیدائشی باشندہ ہے۔
2. یہ کہ Appilant M.Ed, Douable M.A تک تعلیمی یافتہ ہے۔
3. یہ کہ Appilant کا تبادلہ دو مرتبہ ہو چکا ہے۔ GHS Lakary مہمند ایجنسی سے تبادلہ ہو کر GHS Tangi Charmang باجوڑ کو 67 Condidate کے کمان (01-08-2017) آرڈر ہو چکا ہے۔
4. یہ کہ محکمہ E&SE ڈیپارٹمنٹ KP پشاور نے بذریعہ اشتہار محررہ 2007 ان لائن مجاز یہ اپیلنٹ کر کے اہل امیدواروں سے SST کی پوسٹوں کے لیے درخواستیں طلب کیے۔ چونکہ Appilant تمام شرائط پر پورا اتر رہا تھا اس لیے بذریعہ Through Proper Channel اپیلنٹ کی۔
5. یہ کہ بھرتی کی مروجہ طریقہ کار سے نکلتی ہوئے Appilant میرٹ لسٹ میں جگہ بنانے میں کامیاب ہوا۔
6. یہ کہ Appilant کو باقاعدہ طور پر E&SE ڈیپارٹمنٹ کو منظور کیا۔ پہلے کنٹریکٹ بنیاد پر اور بعد میں ریگولر کر دیا گیا۔ یعنی 06-01-2010 کو ریگولر کر دیا گیا۔ اور تب سے لیکر متنازعہ نوٹیفیکیشن کی جاری ہونے تک باقاعدگی سے نوکری سرانجام دیتا رہا۔
7. یہ کہ بغیر چارج شیٹ اور شوکاژ نوٹس و پرسنل ہیئرنگ اور ریگولر انکوری کے Appilant کو یک طرفہ احکامات محررہ 04-04-2019 کی رو سے نوکری سے برخاست کیا گیا۔ بلکہ بھرتی احکامات کو جعلی و فرضی گردانہ کیا اور جو کہ ظلم اور نا انصافی کا منہ بولتا ثبوت ہے۔ اس لیے قابل منسوخی ہے۔
8. یہ کہ Appilant کے 8 سال سے زیادہ عرصہ ملازمت کو بہ یک جہنش قلم ختم کر کے نہ صرف گھر بھیج دیا گیا بلکہ دو ملازمت کی تمام تنخواہیں واپس لی لے جانے کے احکامات جاری کیے گئے جو کہ آئین اور قانون کے منافی ہیں۔ لہذا التماس ہے کہ بمنظوری درخواست ہذا نوٹیفیکیشن محررہ 04-04-2019 کو کالعدم کر کے Appilant ملازمت پر بحال کیا جائے۔

آپ کا مخلص  
عبداللہ SST(G)  
جی ایچ ایس تنگی چارمنگ باجوڑ  
09/04/19

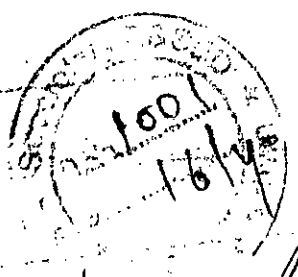
ATTESTED

Deputy Director (Estab)  
Merged Districts

اسم گھرانہ اور پتہ

- 1- عبداللہ ولد سید محمد شہان ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 2- بلال خان ولد علی رحمان ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 3- حفصہ بیگم ولد اختر جان ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 4- عبدالرشید ولد محمد طیب ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 5- محمد سید ولد عزیز ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 6- محمد فاروق ولد محمد یونس ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 7- حفصہ اقبال ولد محمد یونس ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 8- محمد طارق ولد شہزاد ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 9- کبیر احمد ولد خان ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰

- 22) فخرالہ ولد آرام الرحمن (ST) دار فاضلہ اور ترقی
- 23) کذایت العزیز ولد رحیم خان ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 24) عبدالجبار ولد علامہ (FR (AAED) طوسی ای خان
- 25) اشتیاق احمد ولد فضل رازق ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 26) افتخار محمد اقبال ولد خان ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 27) اشتیاق احمد ولد رحیم خان ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 28) فضل رازق ولد فضل رازق ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 29) عطاء اللہ ولد محمد اعجاز ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 30) شہزادہ خان ولد محمد یونس (ST) ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 31) سید قاسم (ST) ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 32) شہزادہ خان ولد رحیم خان (Transfer Settled) ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰
- 33) شہزادہ خان ولد رحیم خان (Transfer Settled) ۹۸۵۵ پتہ ۱۰۱۰۱۰۱۰۱۰



ATTESTED





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

Service Appeal No:1041/2019

**Abdul Hai ,Ex SST (G) B-16 District Bajawar ....Appellant.**

**VERSUS**

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

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**Asstt: Director (Lit: II)**  
E&SE Department, Khyber  
Pakhtunkhwa, Peshawar.

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

Service Appeal No: 1041/2019

**Abdul Hai, Ex SST (G) B-16 District Bajawar.....Appellant.**

**VERSUS**

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

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

Respectfully Sheweth:-

The Respondents submit as under:-

**Preliminary Objections.**

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

- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 4/4/2019 of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.
- 14 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 4/4/2019.
- 15 That the appointment letter of the appellant has been declared as fake and bogus by the Respondent Department.
- 16 That the Notification dated 4/4/2019 has correctly been issued by the Respondent Department after observing all the codal formalities.

**ON FACTS.**

- 1 That Para-1 needs no comments, being pertains to the Service Record of the Appellant against the SST (G) B-16 post which has been declared fake & bogus and even disowned by the Respondent Department vide Notification dated 4/4/2019. In view of the recommendations of the inquiry committee which was constituted vide Notification No. 8154-63 dated 4/8/2016, who submitted its report that the afore said order & Appointment Notification dated 05/01/2010 of the appellant is fake & bogus with no cogent record in the Respondents No.2 & 3 offices.
2. That Para-2 also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct, hence, needs no comments.
- 4 That para-4 is correct to the extent of Advertisement dated 26/01/2009 by the Respondent No.03, wherein, the appellant did not apply for the said post nor appeared in the interview before the Respondent No.3 for the appointment against SST (G) Male B-16 post, hence, the claim of the appellant regarding his appointment vide Notification dated 05/01/2010 is baseless & liable to be rejected in favor of the Respondents. **(Copy of the Ad; dated 26/01/2009 is Annexure-A).**
- 5 That Para-5 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of his stand regarding his recommendations against the SST (G) B-16 post by the KPK PSC & his further adjustment vide Notification dated 05/01/2010 against the said post in the Respondent Department are fake & bogus as the entire service record of the appellant has been found fake & bogus, hence, his services against the SST (G) B-16 post has been disowned & even null & void ab-initio having no legal effect in the eyes of law & rules vide Notification dated 04/04/2019 by the competent authority **(Copy of the said Notification dated 04/04/2019 is Annexure-B).**

- 6 That Para-6 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 4/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & the claim of the appellant regarding his recommendations by the KPK PSC against the SST(G) B-16 & his adjustment as SST vide Notification dated 05/01/2010 are fake & bogus having no record in the Respondent Department.
- 7 That Para-6 is incorrect on the grounds that the Services of the appellant has been placed against the SST (G) B-16 vide order dated 05/01/2010 as per claim of the appellant is also fake & Bogus, hence, disowned by the Respondent Department by the competent authority & where against no Departmental appeal against the Notification dated 4/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant
- 8 That para-7 is incorrect & denied on the grounds that the Services of the appellant against the SST (GP) B-16 has been disowned by the competent authority & where against no Departmental appeal against the Notification dated 4/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant, however, the Respondents further submit on the following grounds inter alia:-

**ON GROUNDS.**

- A **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 4/4/2019 by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- B **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 4/4/2019 by the Respondent Department in the instant case having no question of violation of Article 10-A of the constitution of 1973, hence, the stance of the appellant is baseless & liable to be rejected.
- C **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents as regular inquiry has been conducted vide Notification bearing endst; No.8154-63 dated 4/8/2019 by the competent authority who declared the documents & 1<sup>st</sup> appointment as fake & bogus, hence, the plea of the appellant is without any justification.
- D **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification on the grounds that his 1<sup>st</sup> appointment Notification dated 05/01/2010 of the appellant have been found fake & bogus by the Respondent Department, hence, his services against the SST (G)

F Legal. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

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

Dated \_\_\_ / \_\_\_ /2020



Director

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




Secretary

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

### AFFIDAVIT

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



Deponent

## NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt.

Website: [www.nwfppsc.gov.pk](http://www.nwfppsc.gov.pk)

Dated: 26-01-2009

## ADVERTISEMENT No. 01 / 2009.

A

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

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

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

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

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

ALLOCATION: Merit.

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

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

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

ALLOCATION:

|       |        |
|-------|--------|
| Merit | Zone-1 |
| 01    | 01     |

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

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

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

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

ALLOCATION:

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

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

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

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

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

ESTED

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provisions of the rules for the time being in force.

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

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

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

**ALLOCATION:**

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

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

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

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

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

**ALLOCATION:**

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

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

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

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

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

**ALLOCATION:** Merit.

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

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

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

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

**ALLOCATION:** Merit.

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

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.  
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.  
AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.  
ALLOCATION:

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

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

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.  
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Bdtany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.  
AGE LIMIT: 21 to 40 years. years (10 years age relaxation)  
PAY SCALE: BPS-16 ELIGIBILITY: Female.  
ALLOCATION: Merit.

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

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.  
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.  
AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.  
ALLOCATION: Merit.

TECHNICAL EDUCATION AND MAN POWER TRAINING DEPARTMENT.

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

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.  
OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.  
AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.  
ALLOCATION: Merit.

ATTESTED

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

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

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|            |  |        |        |        |        |
|------------|--|--------|--------|--------|--------|
| (S.No. 66) | Ten (10) Posts of Male office Assistant.   |        |        |        |        |
|            | <u>QUALIFICATION:</u> Bachelor degree from recognized University.<br><u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Male.<br><u>ALLOCATION:</u> |        |        |        |        |
|            | Zone-1   | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
|            | 02   | 02     | 02     | 02     | 02     |

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

**CORRIGENDUM**

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

**GENERAL CONDITIONS.**

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

ATTESTED

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(v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date. (18)

(vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.

(vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.

(viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.

(ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).

(x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).

(xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.

(xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).

(xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:

- Written Test in the Subject.
- General Knowledge or Psychological General Ability Test.
- Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

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

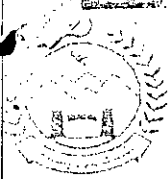
ATTESTED

(Atta Ur Rehman)

Secretary

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

ATTESTED



DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER

PAKHTUNKHWA

PHONE: 011-2511111

FAX: 011-2511111

WWW.DISE.PK

ANNEX G

23

B

NOTIFICATION

1. WHERE AS one Mr. Zafar Iqbal S/O Gul Rehman who himself appointed/adjusted as SST (G) in GMS-Maazullah Khwazai District Mohmand vide Notification No. 955-59/ File No. 2/A-14/SST(M)/PSC/Appit: dated 05/03/2012 and No. 3187-3200 A/PSC (G) 2012 dated 07/03/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mr. Zafar Iqbal S/O Gul Rehman, having no legal status of the said appointment/adjustment order.
5. NOW/THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment/adjustment Notification No.955-59/File No. 2/A-14/SST(M)/PSC/Appit: dated 05/03/2012 and No. 3187-3200, A/PSC (G) 2012 dated 07/03/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr. Zafar Iqbal S/O Gul Rehman in the interest of Public Service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

5647-51  
Encl: No \_\_\_\_\_ dated 7/4 2019  
Copy forwarded to:-

1. Deputy Commissioner, District Mohmand with the request to take legal action.
2. District Education Officer District Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer District Mohmand to co-operate in the matter.
4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

Deputy Director (Estab)  
Merged Districts

ATTESTED

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

Service Appeal No. 1041/2019

Abdul Hai.....Appellant

**VERSUS**

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

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| 2.    | Affidavit   |          | 2       |



Senior Law Officer  
Khyber Pakhtunkhwa  
Public Service Commission Peshawar

UMS88640984

Date: 28/02/2020

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

Service Appeal No. 1041/2019

Abdul Hai.....Appellant

**VERSUS**

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

Next Date Fixed Before The Honorable Tribunal 24.02.2020

**APPLICATION FOR DELETION OF THE RESPONDENT NO. 03**  
**FROM THE PANEL OF RESPONDENTS.**

**RESPECTFULLY SHEWETH:**

1. That the above mentioned appeal is pending before this Honorable Tribunal.
2. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission and the instant service appeal suffers mis-joinder of parties.
3. That the appellant was appointed on contract basis, later on regularized through an act of legislature. So the respondent No. 03 has no concern with the instant appeal, also no relief has been sought against it by the appellant.
4. That respondent No. 03 being linked to the instant appeal neither as necessary, nor proper party, seeks deletion from the panel of respondents.

It is, therefore, requested that on acceptance of this application respondent No. 03 may kindly be deleted from the panel of respondents.

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

*Shahid*

**AFFIDAVIT**

Stated on oath that the contents of this application are true and correct & nothing has been concealed from this Honorable tribunal.

**DEPONENT**

*[Handwritten Signature]*

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

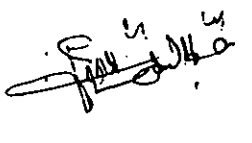
# Receipt

Title Abdul Hai vis GOVT OF KP

Appeal No 1041/2019

I have received Rs 2000/-  
from the KPPSC Representative as  
per court order

Name Abdul Hai

Signature 

Dated - 22/7/20

Before The learned Service Tribunal  
Peshwar.

Abdul Hagi vs. Government of K.P.K.

Application for extension of  
time of expenses of notice  
fee.

Respectfully Sheweth.

1) That the case is pending Adjudication  
Before His Honour and for onward  
proceeding.

2) That appellant (petitioner) was not  
in knowledge to deposit of notice  
fee before the Honour and.

It is therefore most humbly  
prayed an acceptance of  
instant application of  
Appellant (petitioner)

Appellant  
Through  
Adv. Khalid Khan

Date: 28/11/19

