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

Service Appeal No 277/2023

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 3733

Dated 23/2/2023

Mst. Bushra Masoor, District Youth Officer (BPS-17) Mansehra.

.....Appellant

**VERSUS**

1. Secretary Sports, Tourism, Archaeology, Youth affairs and Museums Department, 13-AKhyber Road Peshawar Cantt.
2. Director Youth Affairs, Plot No. 25, Sector F-8, Phase-7, Hayatabad, Peshawar
3. Mr. Naeem Gul, Assistant Director Youth Affairs, Plot No. 25, Setor F-8, Phase-7, Hayatabad, Peshawar
4. Alamzeb Khan (DYO) Private Respondent .

.....Respondents

**PARA-WISE COMMENTS ON BEHALF OF RESPONDENT NO. 04**

.....

**RESPECTFULLY SHEWETH:-**

The Respondent submits the comments are as under: -

**Preliminary objections**

- 1) That the petitioner has neither cause of action nor locus standi to file this Service Appeal.

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- 2) That the appellant has suppressed/concealed material facts from the learned tribunal and hence the appeal is not maintainable on this score alone.
- 3) The appeal in hand is exaggerated and filed with gross misconceptions and is liable to be dismissed.
- 4) That the appellant is stopped by his own conduct.
- 5) That the appellant is not an "aggrieved person" in the eye of law.
- 6) That the appeal is groundless and based on malice, ulterior motive, hence the same is liable to be dismissed.
- 7) That the instant appeal is not maintainable in the present form and also in the present circumstances of the issue.
- 8) That the impugned order dated 10/1/2023 passed by respondent authority is accordance with rule and law and according to civil servants act 1973, hence appeal is liable to be dismissed.
- 9) That the respondent no.4 had relinquished the charge from Battagram office on on 16-01-2023 in compliance of transfer orders issued dated 10/01/2023 and handed over the charge to Mr. Usman Saeed the newly transferred DYO in Battagram.(Copies Attached as annexure A,B)
- 10) That respondent no. 4 presented him at Mansehra office on 17/01/2023 to take the charge as DYO but Mst. Bushra Masroor reluctant to handover the official record and forcefully kept the office.
- 11) That appellant is illegally occupying the District Youth Office Mansehra till date even after the transfer orders by the secretariat.
- 12) That the instant application is based on mala fide intentions.

- 13) That the appellant has not come to this Honorable Tribunal with clean hands.
- 14) That the appellant is not entitled for the relief she has sought from this Honorable Tribunal.
- 15) That the instant appeal is against the prevailing law & rules.
- 16) That the instant appeal is based on mala fide intentions just to put extra pressure on Respondents for gaining illegal mean.
- 17) That the instant appeal is bad misjoinder & non joinder of the necessary parties.
- 18) That the instant appeal is barred by law.
- 19) That the Transfer order vide dated 10/01/2023 is legal on tenure basis as per hard area policy of government & is liable to be maintained in favor of the Respondent no.4.
- 20) That as per service servant act 1973 under section 10 wherein every service servant shall be liable anywhere within province or local authority established by the government.
- 21) That the appellant was transferred for the reason smooth running of the dept: it is pertinent to mentioned here but only the appellant agitate the transfer order for their ulterior motives.

**ON FACT**

- 1 Denied for want of knowledge.
- 2 Para -2 is incorrect and denied that the appellant was transferred from Mansehra to District Battagram vide dated 28-08-2019 whereby appellant did not assume the charge of DYO Battagram and has been transferred to district Abbottabad vide order dated 17-09-

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2019 after 18 days. Whereas the respondent no.4 posted in Battagram vide order No:19 Posting/YA/2019/361 on Dated 30-04-2019 has performed his official duties with full responsibilities for a period of 3 years and 10 months. That the Respondent No.4 served almost 4 years in an Unattractive Area which exceeds the normal tenure in hard area and is transferred to Mansehra on the basis of applications that were submitted for transfer to respondent no 1 to 3 **(copies of transfer orders and application are attached as annexure C, D, E & F, G, H respectively)**. It is necessary to mention here that respondent no.4 was selected on open merit through KPPSC and has been standing at 6<sup>th</sup> position on seniority list and despite being on merit was not appointed in his home station in his 4 years of service. **(Seniority List annexed as I)**.

3. Para -03 is incorrect and denied the appellant was mutually transferred from both the offices from District Abbott bad to District Mansehra on their whims and wishes. **(Copy of transfer order is attached as annexure J)**.
4. Para-04 is incorrect and denied that the appellant is transferred from District Mansehra to District Torghar after completion of hard area normal tenure twice i.e 4 years, whereas the claim of appellant is totally baseless and on mala fide intentions that all those transfer orders were made out on her will and at desired duty stations. As she started her job from Manshera on 9<sup>th</sup> April 2019 and her last transfer order were issued from Mansehra on 10<sup>th</sup> Jan 2022, it is evident that appellant has been serving in Abbottabad and Mansehra for 4 years. Whereas the respondent-4 was transferred from District Battagram to District Mansehra after observing hard area tenure of one years thrice than normal that is 4 years at District Battagram. **(Copy of transfer order is attached as annexure K)**
5. Para -5 is incorrect, the appellant is not aggrieved person in the eyes of Law hence the appeal is not maintainable and liable to be set aside in the following grounds.

GROUNDS

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- A. Incorrect all those transfer orders were carried out on her will and to her desired duty stations and were carried out on mutual basis with DYO Abbottabad. As she started her job from Manshera on 9<sup>th</sup> April 2019 and her last transfer order were issued from Mansehra on 10<sup>th</sup> Jan 2022, it is evident that she has been serving in Abbottabad and Mansehra for 4 years and only transfer made was on her will, so her claim doesn't imply here.
- B. Incorrect and denied as all the orders of appellant were issued as per policy and also whims and wishes of appellant.
- C. Incorrect and misleading. Just to cover her illegal acts. Moreover, transfer order was issued according to law and rules there is no political motivation.
- D. Incorrect, as the order of transfer was made on the tenure basis of respondent no.4 and the applications he submitted to the directorate & worthy secretary, therefore the stand of appellant is baseless and not maintainable. **(Copies of application are attached as annexure I, M& N).**
- E. Incorrect that the claim of appellant is against the spirit of Wedlock policy. The fact is wedlock policy is not applicable in her case as her husband Mr Maaz Nazir Khan sub-Inspector ANF is posted in Peshawar directorate while Ms. Bushra has enjoyed home station since the initial date of appointment and still wants to continue services in her home station Mansehra. Moreover as per wedlock policy she may be adjusted at Peshawar but not in mansehra.
- F. Incorrect that Torghar is a newly formed district which lacks basic necessities and doesn't have a metal road. The fact is that travelling towards Torghar is safe and subtle as asphaltic road is built. She also mentioned that the said District is not safe for women, this is also not true as several female employees, like in education department (DEO, DDEO, SDEOs) Social Welfare department, CDLD and even worthy female Deputy Director Agriculture department is also working there. Many other females are also working in District Torghar in different capacities. Whereas number of the courts also established in District Torghar where in the Honorable female judged also

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performed their duties at Toghhar. She claimed that there is no residence facility for females in District Torghar while the fact is office building has proper residence for their officers and also government officer's residential colony is functional which can be confirmed from worthy Deputy Commissioner Torghar.

- G- Incorrect, the detailed reply given in above Para F.
- H- No comments.
- I. That the respondent no 4 if comes across other grounds which are not specifically mentioned in the above said grounds, will be argued with the permission of this Honorable court at the time of arguments.

*It is therefore most graciously requested that the appeal of appellant may kindly be dismissed with cost.*

Respondent No.4

Through:

(SYED NOMAN ALI BUKHARI)

ADVOCATE, PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of reply are true and correct to the best of my knowledge and belief.

DEPONENT



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

**Service Appeal No 277/2023**

Mst. Bushra Masoor, District Youth Officer (BPS-17) Mansehra.

.....Appellant

**VERSUS**

1. Secretary Sports, Tourism, Archaeology, Youth affairs and Museums Department, 13-AKhyber Road Peshawar Cantt & Three Others

**RESPONDENTS**

.....

**APPLICATION FOR VACATION OF  
SUSPENSION ORDER.**

**RESPECTFULLY SHEWETH:**

1. That the appellant has filed an reply along-with application.
2. That the respondent no.4 has good prime facie case and all the ingredients is in favour of respondent.
3. That the grounds of reply may also be considered as integral part of this application.

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4. That the transfer order of the appellant was comply with and the respondent n0-4 taken charge. Hence suspension order may be vacated. Further it is added that the post of the R-4 was also occupied as per order, now the salary of the R-4 was also stopped. **Copy of arrival report is attached.**

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It is, therefore, most humbly prayed that the suspension order may be vacated. Any other remedy, which this august tribunal deems fit that may also be awarded in favour of appellant.

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Respondent No.4

Through:

*Handwritten signature*

(**SYED NOMAN ALI BUKHARI**)

ADVOCATE, PESHAWAR.

**AFFIDAVIT:**

It is affirmed and declared that the contents of this Application are true and correct to the best of my knowledge and belief.



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DEPONENT

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Annexure A

**OFFICE OF THE DISTRICT YOUTH OFFICER  
BATTAGRAM**

Email: [districtyouthofficebm6251@gmail.com](mailto:districtyouthofficebm6251@gmail.com)

Contact No: 0997-310196

No. 270(1-7) DO (Youth BM)

Dated: 16/01/2023

**CHARGE RELINQUISH CERTIFICATE**

Consequent upon the Government of Khyber Pakhtunkhwa, Sports & Youth Affairs Department, Notification No. SO (Y) Y-2/P&T-Deputation/2022: Dated Peshawar the 10<sup>th</sup> January, 2023, I **Mr. Alam Zeb Khan**, District Youth Officer Battagram (BPS-17), hereby relinquish charge of this Office w.e.f 16/01/2023 (A.N) in the best public interest.



**ALAM ZEB KHAN**  
District Youth Officer  
Battagram

**Copy forwarded for the information and necessary action, please:**

1. Deputy Commissioner Battagram.
2. Director Youth Affairs, Khyber Pakhtunkhwa-Peshawar.
3. District Account Officer, Battagram.
4. The Manager NBP Battagram Branch.
5. PS to Secretary, Sports & Youth Affairs Department, Khyber Pakhtunkhwa.
6. PA to AS-II, Sports Department, Khyber Pakhtunkhwa.
7. PA to Deputy Secretary-II, Sports Department, Khyber Pakhtunkhwa.
8. Office File.

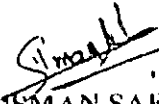


**ALAM ZEB KHAN**  
District Youth Officer  
Battagram

**ATTESTED**

**CHARGE ASSUMPTION CERTIFICATE**

In compliance with the Secretary to Government of Khyber Pakhtunkhwa, Sports & Youth Affairs Department, Notification No. SO (Y) Y-2/P&T-Deputation/2022: Dated Peshawar the 17<sup>th</sup> January, 2023, I Mr. Usman Saeed, District Youth Officer (BPS-17), hereby assume the charge of the post of the District Youth Officer Battagram w.e.f 17/01/2023 (03:00 PM).

  
USMAN SAEED  
District Youth Officer


**OFFICE OF THE DISTRICT YOUTH OFFICER BATTAGARM**

No. ~~274~~ 281 /Youth File/2022-23

Dated Battagram 17-01-2023

Copy forwarded for the information and necessary action, please:

1. The Director Youth Affairs, Khyber Pakhtunkhwa-Peshawar.
2. The Deputy Commissioner, Battagram.
3. The District Account Officer, Battagram.
4. The Manager NBP Main Branch Mansehra.
5. The PS to Secretary, Sports & Youth Affairs Department, Khyber Pakhtunkhwa.
6. PA to AS-II, Sports Department, Khyber Pakhtunkhwa.
7. PA to Deputy Secretary-II, Sports Department, Khyber Pakhtunkhwa.
8. Office File.

  
USMAN SAEED  
District Youth Officer  
Battagram

ATTESTED

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Director  
YOUTH AFFAIRS  
Dated Peshawar the 28th August 2019

He is authorized to hold the post of District Youth Affairs Peshawar in addition to his own duties. He is authorized to hold the post of District Youth Affairs Peshawar in addition to his own duties.

6 Mr Iqbal Ullah  
District Youth Officer  
(BPS-15) Swat

Mr. Roshan Aram  
Computer Operator (BPS-15) is relieved from the post of District Youth Affairs Peshawar.

5 Mr Zubair Ahmad  
District Assistant  
Director (Operation)  
(BPS-15)  
Duarlatore  
of Youth  
Affairs  
Peshawar

Mr. Hangu  
District Sports Officer  
the additional charge of  
the post of District Youth  
Affairs Peshawar.

4 Mr Faiz Khan  
District Youth Officer  
(BPS-15)  
Shangla

Mr. Alam Zaid  
District Youth Officer  
(BPS-15)  
Abolabad

3 Mr Alam Zaid  
District Youth Officer  
(BPS-15)  
Bahagram

Mr. Taleb Saleem  
District Youth Officer  
(BPS-15)  
He is also authorized to hold the additional charge of the post of District Youth Affairs Peshawar.

1 Mr Taleb Saleem  
District Youth Officer  
(BPS-15)  
Abolabad  
Manehra

Remarks

To From

S.No Name Designation/BP From To Remarks

Office Order No. 878

Dated Peshawar the 28th August 2019

No 17 Postings/Transfers/YA 2019 - The Competent Authority has been pleased to order the following postings/transfers of the District Youth Officers/Assistant District Officers with immediate effect in the public interest.

COMMISSIONER OF YOUTH AFFAIRS

Director Youth Affairs Peshawar

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Stamp: DIRECTOR YOUTH AFFAIRS PESHAWAR, 28-8-19

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Annexure-D

(12)



DIRECTORATE OF YOUTH AFFAIRS  
KHYBER PAKHTUNKHWA  
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT  
PHONE 9211626 FAX# 9212766

Mr. 434 Dated Peshawar, the 17<sup>th</sup> September 2019

**OFFICE ORDER.**

No. 17/Postings/Transfers/YA/2019 - The Competent Authority has been pleased to order the following postings/transfers of the District Youth Officers with immediate effect in the public interest:-

S.No	Name/Designation/EPS	From	To	Remarks
1	Mr. Talal Saleem, District Youth Officer (BPS-18)	Abbotabad	Mansehra vice S No.2	He is also authorized to hold the additional charge of the post of District Youth Officer, Torghar in addition to his own duties
2	Miss Bushra Masroor, District Youth Officer (BPS-18)	Battagram	Abbotabad vice S No.3	Under Transfer
3	Mr. Alam Zeb District Youth Officer (BPS-18)	Abbotabad	Battagram vice S No.2	Under Transfer
4	Mr. Fahim Hayat, District Youth Officer (BPS-18)	Di Khan	Haripur against the vacant post	District Sports Officer Haripur, is relieved from the additional charge of the post of District Youth Officer, Haripur
5	Mr. Zuqair Ahmed Khattak, Assistant Director (Operation) (BPS-18)	Buner	Charsadda against S No.6	Under Transfer
6	Mr. Fahim Jan, District Youth Officer (BPS-16)	Charsadda	Buner against S No.5	Mr. Roohul Amin Computer Operator (BPS-16), is relieved from the additional charge of District Youth Officer, Buner
7	Roza Ullah, District Youth Officer (BPS-16)	Tank	Di Khan against S No.4	He is authorized to hold additional charge of District Youth Officer, Tank.

DIRECTOR  
YOUTH AFFAIRS

Encls: No. 17/Postings/Transfer/YA/2019 Dated, Peshawar, the 17<sup>th</sup> September, 2019

A copy is forwarded for information and necessary action to -

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar

ATTESTED

KHYBER PAKHTUNKHWA

PESHAWAR SPORTS COMPLEX PESHAWAR CANAL  
PHONE 9221000 FAX 9222766

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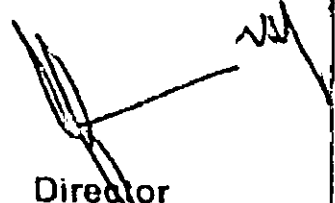
2019 No. 361

Annex - E dated 10/04/2019

OFFICE ORDER

No. 19 Posting/YA/2019. Consequent upon their appointment as District Youth Officer BPS 19 in the Directorate of Youth Affairs vide office order No. 1/appointment/DYO/Youth Affairs/2018-19 dated 9-04-2019 the Competent Authority has been pleased to post them against the vacant post mentioned against each with immediate effect in the public interest till further orders

S NO	NAME	PLACE/POSTING
1	Mr Raza Ullah S/O Hazrat Umar	District Youth Officer Tank
2	Mr Jehan Zeb S/O Muhammad Akram Khan	District Youth Officer Dir Upper
3	Mr Aram Zeb Khan S/O Khan Muhammad	District Youth Officer Battagram
4	Mr Muhammad Zahid S/O Sardar Ali Khan	District Youth Officer Karak
5	Mr Faisal Khan S/O Obaid Ullah Khan	District Youth Officer Shangla
6	Mr Adil Khan S/O Kachkol Khan	District Youth Officer Nowshera
	Mr Gohar Ali S/O Allah Dad	District Youth Officer Kohat
8	Mr Tahir Saleem S/O Muhammad Saleem Awan	District Youth Officer Abbottabad
9	Mr Shehzad Tariq S/O Israr Ud Din	District Youth Officer Malakand

  
Director  
Youth Affairs

Copy Forwarded to

- 1 Accountant General Khyber Pakhtunkhwa
- 2 Deputy Commissioner (Concerned Districts)
- 3 District Accounts Officer (Concerned Districts)
- 4 District Sports Officer (Concerned Districts)
- 5 District Youth Officer (Concerned Districts)
- 6 P S to Secretary Sports & Youth Affairs Department Khyber Pakhtunkhwa Peshawar

ATTESTED



OFFICE OF THE DISTRICT YOUTH OFFICER  
BATTAGRAM

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No. 96 /DYO(BM)

Date: 17/09/2020

To


Director Youth Affairs,  
Khyber Pakhtunkhwa,  
Peshawar.

Annex F

Subject: APPLICATION FOR TRANSFER TO HOME DISTRICT ON  
NEED-CUM-HUMANITARIAN GROUNDS

Respected Madam,

With reference to aforementioned subject, please find enclose herewith a self-explanatory application in respect of **Mr. Alam Zeb Khan**, District Youth Officer Battgram for favour of further necessary action please.

  
District Youth Officer  
Battagram

Annex F

ATTESTED

To

The Director Youth Affairs,  
Khyber Pakhtunkhwa,  
Peshawar.

Annex F-(i)

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“THROUGH PROPER CHANNEL”

Subject: **APPLICATION FOR TRANSFER TO HOME DISTRICT ON  
NEED-CUM-HUMANITARIAN GROUNDS**

Respected Madam,

With due veneration, it is stated in your honour that the undersigned has been working as DYO in district Battagram for the last one and a half year and carrying out his mandated duties diligently.

It is pertinent to mention here that the undersigned had been selected on the open merit quota and, therefore, stood first in his zone of residence (Zone-5), making him more competent candidate for posting to his home district. But due to some personal issues of DYO Mansehra, the u/s consented to his posting to Battagram after the former promised to have mutual transfer with the latter after lapse of one year, but that promise is yet to be realized.


Family of undersigned is composed of his sisters and parents who are residing in Mansehra with the u/s. While attending to his duties in battagram is very much inconvenient but somehow, manageable. But in the recent past, father of this officer undergone an open heart surgery making him a strong candidate for due care and attention of the u/s.

Therefore, the u/s requests your office to consider this application in forgoing context and order his transfer to his home district which will not only save him some money, to be utilised for the treatment of his ailing father but also time of travelling to and from battagram to look after for the latter. DYO Mansehra is willing to forego the station of mansehra for facilitation of this officer.

Thanking you in anticipation.



**Alam Zeb Khan**  
**District Youth Officer**  
**Battagram**

  
ATTENDED

To

The Director Youth Affairs,  
Khyber Pakhtunkhwa,  
Peshawar.

Annex-9

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“THROUGH PROPER CHANNEL”

Subject: **APPLICATION FOR TRANSFER TO HOME DISTRICT MANSEHRA**

Respected Sir,

With due veneration, it is stated to your honor that the undersigned has been working as DYO in district Battagram since the initial Date of appointment 30-4-2019 to till date (2 years and 9 months) and carrying out his mandated duties diligently.

It is pertinent to mention here that the undersigned had been selected on the open merit quota and therefore, stood first in his zone of residence (Zone-5), making him a more competent candidate for posting to his home district. But due to some personal issues of DYO Mansehra, the undersigned consented to his posting to Battagram after the former promised to have a mutual transfer with the latter after the lapse of one year, but that promise is yet to be realized.

On 28<sup>th</sup> August 2019, the u/s was transferred to district Abbottabad but without any reason, after two weeks the undersigned has been again transferred to Battagram on 17<sup>th</sup> September, 2019. The DYO Mansehra and Abbottabad have both been posted in their local districts since date of appointment and, their tenure of two years is completed.

It is worth mentioning that the undersigned fulfills the posting/transfer policy of the provincial government of Unattractive areas' tenure of two years.

Therefore, the u/s requests your good office to consider this application in forgoing context and issue a transfer order to his home district which will not only save the undersigned some expenses but also the time of traveling to and from Battagram. DYO Mansehra is willing to forego the station of Mansehra for the facilitation of this officer.

Thanking you in anticipation.



Alam Zeb Khan  
District Youth Officer  
Battagram

Dated: 11-01-2022

  
**ATTESTED**



To

The Secretary Youth Affairs,  
Khyber Pakhtunkhwa,  
Peshawar.

Annex H 17

Subject: **APPLICATION FOR TRANSFER TO HOME DISTRICT MANSEHRA**


Respected Sir,

With due veneration, it is stated to your honor that the undersigned has been working as DYO in district Battagram since the initial Date of appointment 30-4-2019 to till date (3 and half years) and carrying out his mandated duties diligently.

It is pertinent to mention here that the undersigned had been selected on the open merit quota and therefore, stood first in his zone of residence (Zone-5), making him a more competent candidate for posting to his home district. Moreover, the undersigned fulfills the posting/transfer policy of the provincial government of Unattractive areas' tenure of two years. The officers posted in district Mansehra and Abbottabad mutually broke their transfer tenure twice in settled districts, which deprived the undersigned from posting to settled district.

Therefore, the u/s requests your good office to consider this application in forgoing context and issue a transfer order to his home district Mansehra, which will not only save the undersigned some expenses but also the time of traveling to and from Battagram.

Thanking you in anticipation.

  
Alam Zeb Khan  
District Youth Officer  
Battagram

Dated: 26-08-2022

Cell No. 03158168515

  
**ATTESTED**

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Annex-I

**PROVISIONAL SENIORITY LIST OF DISTRICT YOUTH OFFICERS BPS-17  
OF DIRECTORATE OF YOUTH AFFAIRS, KHYBER PAKHTUNKHWA AS STOOD ON 31-12-2022**

S.#	Name of incumbents with academic qualification.	Date of Birth with Domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Date of joining the post of District Youth Officer (B-16) on regular basis.	Regular Appointment/Promotion to the present post.			Place & Date Current of Posting
					Date	BPS	Method of Recruitment	
1.	Mr. Zubair Ahmad Khattak	Charsadda 03/02/1986	17/04/2019	18/04/2019	17/11/2021	17	Upgradation	Assistant Director (OPs) Directorate of Youth Affairs, 01-09-2022
2.	Sardar Muhammad Irfan Ali	Peshawar 16/04/1986	11/04/2019	11/04/2019	17/11/2021	17	Upgradation	Assistant Director (B&A) Directorate of Youth Affairs, 01-09-2022
3.	Mr. Jehan Zeb	Dir lower 20/05/1985	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Dir Upper 17-08-2022
4.	Mr. Usman Khan	Mardan 19/04/1992	16/04/2019	16/04/2019	17/11/2021	17	Upgradation	District Youth Office, Mardan 01-09-2022
5.	Mr. Raza Ullah	North Waziristan 21/04/1993	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Tank 17-08-2022
6.	Mr. Alam Zeb Khan	Mansehra 01/03/1995	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Battagram 17-09-2019
7.	Mr. Shehzad Tariq	Dir lower 10/09/1986	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Dir Lower 08-07-2021
8.	Mr. Sadam Khan	Swabi 09/03/1993	11/04/2019	11/04/2019	17/11/2021	17	Upgradation	District Youth Office, Swabi 07-06-2022
9.	Mr. Faisal Khan	South Waziristan 17/07/1988	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Hangu 27-09-2022
10.	Mr. Adil Khan	Nowshera 10/04/1985	10/06/2014	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Charsadda 17-08-2022
11.	Mr. Irshad Ullah	Lakki Marwat 23/03/1988	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, D.I. Khan 17-08-2022

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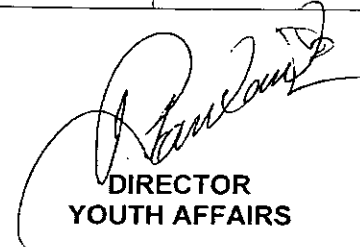
ATTESTED

Annex II(i)

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**ATTESTED**

S.#	Name of incumbents with academic qualification.	Date of Birth with Domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Date of joining the post of District Youth Officer (B-16) on regular basis.	Regular Appointment/Promotion to the present post.			Place & Date Current of Posting
					Date	BPS	Method of Recruitment	
12.	Mr. Izhar Ud Din	Dir(L) 20/11/1990	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Malakand 08-07-2021
13.	Mr. Abdul Qadir	FR Lakki Marwat 05/03/1990	11/04/2019	11/04/2021	17/11/2021	17	Upgradation	District Youth Office, Lakki Marwat 17-08-2021
14.	Mr. Talal Saleem	Mansehra 03/08/1990	12/04/2019	12/04/2021	17/11/2021	17	Upgradation	District Youth Office, Abbottabad 01-02-2022
15.	Mr. Farhad Ali Khan	Swat 19/01/1992	21/01/2020	21/01/2020	17/11/2021	17	Upgradation	District Youth Office, Swat 07-01-2021
16.	Mr. Kamran Ullah	FR Bannu 25/02/1992	31/01/2019	15/04/2019	17/11/2021	17	Upgradation	District Youth Office, Bannu 01-08-2022
17.	Mr. Faheem Jan	Charsadda 26/04/1989	30/12/2017	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Nowshera 08-07-2021
18.	Mr. Muhammad Zahid	Karak 04/04/1990	23/12/2015	16/04/2019	17/11/2021	17	Upgradation	District Youth Office, Karak 17-08-2022
19.	Mr. Fahim Hayat	Tank 13/10/1985	12/04/2019	12/04/2019	17/11/2021	17	Upgradation	District Youth Office, Haripur 17-09-2019
20.	Mr. Usman Saeed	Abbottabad 12/02/1992	21/01/2020	21/01/2020	17/11/2021	17	Upgradation	District Youth Office, Torghar 21-01-2020
21.	Ms. Bushra Masroor	Mansehra 03/02/1988	15/04/2019	15/04/2019	17/11/2021	17	Upgradation	District Youth Office, Mansehra 29-12-2021

  
DIRECTOR  
YOUTH AFFAIRS



**DIRECTORATE OF YOUTH AFFAIRS  
KHYBER PAKHTUNKHWA**

Plot No.28, Sector E-8, Phase-7, Hayatabad Peshawar  
Email: [info@kpyouthaffairs.gov.pk](mailto:info@kpyouthaffairs.gov.pk)  
Ph: # 091-9219073, 091-9219668

20

No. DYA/Estab/Seniority/2023/228

Dated: 30/01/2023

To

All District Youth Officers,  
Khyber Pakhtunkhwa.

Subject: - PROVISIONAL SENIORITY LIST OF DISTRICT YOUTH OFFICERS (BPS-17) OF DIRECTORATE OF YOUTH AFFAIRS AS STOOD ON 31-12-2022

I am directed to refer to the subject noted above and to enclose herewith Tentative Seniority List of District Youth Officers (BPS-17) in the Directorate of Youth Affairs Khyber Pakhtunkhwa as stood on 31-12-2022.

The Tentative Seniority List is circulated, in case there is any objection, the aggrieved person should route an appeal supported by documentary proof within thirty (30) days of the issuance of this letter, failing which the seniority list will be treated as final.

No appeal / representation shall be accepted after the target period.

ASSISTANT DIRECTOR (ESTAB)

Copy forwarded for information to the:-

1. Section Officer(YA), Sports & Youth Affairs Department, Khyber Pakhtunkhwa.
2. PA to Director Youth Affairs, Khyber Pakhtunkhwa, Peshawar.

ASSISTANT DIRECTOR (ESTAB)

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA  
SPORTS, TOURISM, CULTURE, ARCHAEOLOGY, MUSEUMS  
& YOUTH AFFAIRS DEPARTMENT

Annex-J

(21)

Dated Peshawar the 24<sup>th</sup> January, 2022

**NOTIFICATION**

No. SO (Y) Y-2/P&T-Deputation/2021/11646-58<sup>th</sup> The Competent Authority is pleased to order the following posting / transfer of officers of Directorate of Youth Affairs, Khyber Pakhtunkhwa in the public interest with immediate effect:-

Sr. #	Name of Incumbent	From	To
1	Mrs. Bushra Masroor, District Youth Officer (BS-17)	District Youth Office, Abbottabad	District Youth Office, Mansehra
2	Mr. Talal Saleem, District Youth Officer (BS-17)	District Youth Office, Mansehra	District Youth Office, Abbottabad

Sd/-  
Secretary to Govt. of Khyber Pakhtunkhwa  
Sports, Tourism, Culture, Archaeology, Museums  
& Youth Affairs Department

Ends of even No. & date:

29/12/2021

1. Accountant General, Khyber Pakhtunkhwa
2. Director Youth Affairs, Khyber Pakhtunkhwa (with ref. to his letter No. DYA/ADMIN/TRANSFER/2021/11646 dated 29-12-2021).
3. PS to Secretary, Sports and Youth Affairs Department, Khyber Pakhtunkhwa.
4. PAS to AS-I & AS-II, Sports Department, Khyber Pakhtunkhwa.
5. PA to Deputy Secretary-III, Sports Department, Khyber Pakhtunkhwa.
6. Officer concerned

Section Officer (Youth Affairs)

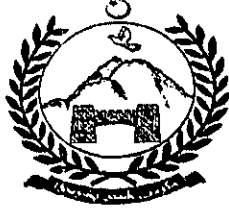
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Received on  
24/1/2022

24.1.2022

**ATTESTED**



GOVERNMENT OF KHYBER PAKHTUNKHWA,  
SPORTS & YOUTH AFFAIRS DEPARTMENT

13-A Khyber Road, Peshawar



091-9211169



091-9212535



socamu940@gmail.com

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Annex K-

Dated Peshawar the 10<sup>th</sup> January, 2023

**NOTIFICATION**

**No. SO (Y) Y-2/P&T-Deputation/2022:** The following posting / transfer amongst the Officers of Directorate of Youth Affairs, Khyber Pakhtunkhwa is hereby ordered with immediate effect in the best public interest: -

S.No	Name of Officer	From	To
1.	Mr. Usman Saeed District Youth Officer (BS-17)	District Youth Office Torghar	District Youth Office Battagram / vice Sr. No.2
2.	Mr. Alamzeb Khan District Youth Officer (BS-17)	District Youth Office Battaram	District Youth Office Mansehra vice Sr. No. 3
3.	Mr. Bushra Masroor District Youth Officer (BS-17)	District Youth Office Mansehra	District Youth Office Torghar vice Sr. No. 1

Sd/

Secretary to Govt: of Khyber Pakhtunkhwa  
Sports, Tourism, Culture, Archaeology, Museums  
& Youth Affairs Department

Endst of even No. & date: 443-48

Copy to the:

1. Director Youth Affairs, Khyber Pakhtunkhwa.
2. District Accounts Officers Torghar, Battagram and Masehra.
3. PS to Secretary, Sports and Youth Affairs Department, Khyber Pakhtunkhwa.
4. PA to AS-II, Sports Department, Khyber Pakhtunkhwa.
5. PA to Deputy Secretary-II, Sports Department, Khyber Pakhtunkhwa.
6. Officer Concerned.

10/01/2023  
Section Officer (Youth Affairs)

ATTESTED

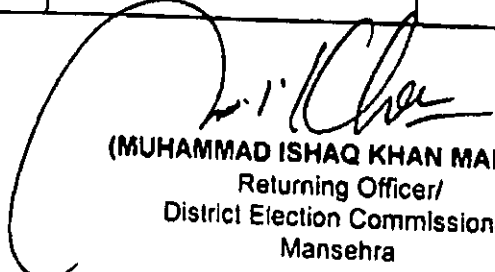
## PROVISIONAL CONSOLIDATED STATEMENT OF RESULTS OF THE COUNT

## Election to the Local Government

1. No. and Name of Local Council: Tehsil Council Mansehra  
 2. Category of Seat: Chairman District: Mansehra Tehsil: Mansehra  
 3. Total number of Polling Stations: 301  
 4. Number of registered votes in the constituency: Male 193895 Female 166923 Total: 360818  
 5. Total number of votes polled: Male 97998 Female 74869 Total 172967  
 6. Number of valid votes polled: 162167  
 7. Number of votes excluded from the count 10800  
 8. Percentage of votes polled 47.93%

S.No.	Name of Contesting Candidate	Party affiliation (if any)	Number of Votes Obtained
1	2	3	4
1	Ahmed Khan	Jamat-e-Islami Pakistan	9849
2	Ishfaq Ahmed	Independent	3723
3	Rustam Khan	Tehreek-e- Tahafuz-e- Pakistan	862
4	Sajid Hussain Tanoli	Tehreek-e-Labbaik Pakistan	6663
5	Sheikh Muhammad Shafi	Pakistan Muslim League (N)	56093
6	Adil Dilawar	Independent	7675
7	Atiq UR Rehman Khan Jehangiri	Jamiat Ulemae Islam Pakistan	11719
8	Umair Ashiq	Qaumi Wattan Party	12391
9	Kamal Saleem Khan	Pakistan Tehreek-e-Insaf	47776
10	Muhammad Farooq	Pakistan Peoples Party Parliamentarians	4474
11	Waheed Anjum	Independent	942

Place: Mansehra  
 Date: 01-04-2022

  
 (MUHAMMAD ISHAQ KHAN MARWAT)  
 Returning Officer/  
 District Election Commissioner  
 Mansehra

ATTESTED