

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

Service Appeal No: 101/2023

Fazal Ur Rehman, Senior Clerk District KohatAppellant

VERSUS

**Government of, Khyber Pakhtunkhwa through the Secretary E&SE Khyber
Pakhtunkhwa & others.....Respondents**

INDEX

S/#	Description of document	Annexure	Pages No.
1	Joint Para Wise Comments along with affidavit	-	1-3
2	Copy of the Notification dated 17-02-1991.	A	4
3	Copy of the FIR dated 11-11-2016 & order dated 21-11-2016.	B & C	5-7
4	Copy of the Notification dated 30-06-2017 & Promotion Notification dated 04-08-2017.	D & E	8-12
5	Copy of the order dated 02-09-2020 & Notification dated 22-09-2020.	F & G	13-16
6	Copy of the Notification dated 15-02-2021	H	17-19
7	Authority Letter	I	20

Handwritten signature and date: 27-6-23
**Assistant Director (Lit: II)
E&SE Khyber Pakhtunkhwa,
Peshawar.**

①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No: 101/2023

Diary No. 6957

Dated 16/08/23

Fazal Ur Rehman, Senior Clerk District KohatAppellant

VERSUS

Government of, Khyber Pakhtunkhwa through the Secretary E&SE Khyber
Pakhtunkhwa & others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth,

The Respondents as under.

PRELIMINARY OBJECTIONS.

- 1 **That** the Appellant has got no cause of action and locus standi to file instant appeal.
- 2 **That** the appeal is not maintainable and incompetent in the eyes of law in the present form.
- 3 **That** the appellant is estopped due to his own conduct to file this appeal.
- 4 **That** the appellant is not an aggrieved person within the meaning of Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 5 **That** the appellant has not come to this Learned Tribunal with clean hands and has also concealed material facts from the ambit of this Learned Tribunal.
- 6 **That** the appeal is bad for mis-joinder and non-joinder of necessary parties.
- 7 **That** the appeal in hand is pre mature, hence, not maintainable.
- 8 **That** the Honorable Tribunal has no jurisdiction to entertain the instant appeal in its present form and even fact & circumstances.
- 9 **That** the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present frame and context.
- 10 **That** the impugned Notification dated 15-12-2021 is legal & liable to be maintained.
- 11 **That** the appellant has refused his promotion against the senior clerk post in the Notification dated 30-06-2017 as evident from the Notification dated 04-08-217 of the Respondent No. 2, hence not, entitle for promotion w.e.f 30-05-2017.

12 That the appellant has correctly been placed in the final seniority list of the senior clerk's cadre by the Respondent Department.

ON FACTS.

- 1 That Para-1 pertain to the appointment of appellant as junior clerk in BPS-5 vide Notification dated 17-02-1991 attached as *Annex-A*.
- 2 That Para-2 is also pertains to the duty against the cited post in lieu of the salary & other service benefit in the Respondent Department.
- 3 That para-3 is correct that in FIR No. 3 dated 11-11-2016 was registered against the appellant at PS-ACE Kohat U/S-161 PPC, 5(2) PC Act and consequent upon the same FIR, the appellant was suspended from service U/R-6 of E&D Rules 2011 vide order dated 21-11-2016 by the giving effect from 11-11-2016 issued by the Respondent No. 3 & are attached as *Annex-B & C*.
- 4 That Para-4 is incorrect & mis-leading on the grounds that the promotion order dated 30-06-2017 is the result of due process of law in term of Section-9 of Civil Servant Act 1973 read with Rule-7 of the APT Rules-1989 made by the Department, wherein, the appellant could not made out his case for promotion & later on promoted to the post of senior clerk vide Notification dated 30-06-2017 with reference to serial No. 8 (63/220) by placing but was held in the abeyance on the grounds of his involvement in the above said criminal case vide Notification dated 04-08-2017 issued by the Respondent No. 2 which are attached as *Annex-D & E*.
- 5 That Para-5 is correct as already replied in para-4 by the Respondent Department.
- 6 That Para-6 is also correct to the extent of the order dated 02-09-2020 of the Learned Special Judge inti-corruption camp Court Kohat & reinstatement in the service of the appellant vide Notification dated 22-09-2020 in the light of afore said judgment which are attached as *Annex-F & G*.
- 7 That Para-7 is correct that vide Notification dated 15-02-2021, the appellant was promoted to the post of S/C in BPS-14 falling at S.No. 17 issued by the Respondent No. 2 under the cited provision of law & rules attached as *Annex-H*.
- 8 That Para-8 is incorrect as no Departmental appeal against the Notification dated 15-02-2021 has been filed by the appellant till date, hence, got finality under the law, therefore, the appeal in hand is liable to the dismissed on the following ground inter alia: -

ON GROUNDS.

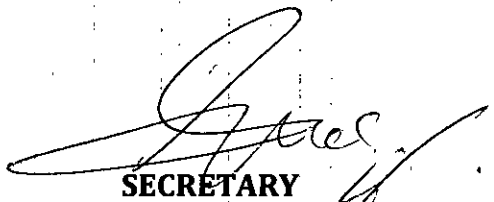
A. Incorrect & not admitted, the appellant has been treated as per law vide Notification dated 15-02-2021 & is not entitled to promotion as S/C in BPS-14 w.e.f 30-05-2017 on the grounds of his involvement and criminal case & court proceeding.


- B. Incorrect & not admitted. The plea of the appellant is illegal & liable to be rejected.
- C. Incorrect & not admitted. Strongly denied. The Respondent Department treated the appellant according to law, rule and policies of the Govt: in the titled case.
- D. Incorrect & not admitted. The plea of the appellant is illegal & liable to be rejected.
- E. Incorrect & not admitted, The stand of the appellant is illegal & liable to be rejected on the grounds that he is not entitled for promotion as S/C in BPS-14 w.e.f. 30-05-2017 instead of 15-02-2021 in the Department.
- F. Legal. However, the Respondent also seek leave of this Honorable bench to submit additional grounds record & case law at the time of arguments on the date fixed in the titled case.

PRAYER

In view of the above made submission it is requested that this Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.

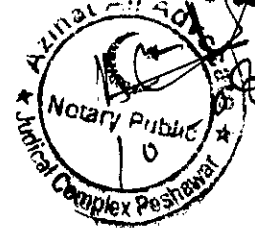
Dated ___/___/2023



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


DIRECTOR
 E&SE Department Khyber
 Pakhtunkhwa, Peshawar.
 (Respondents No: 3 & 3)

AFFIDAVIT

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

ATTESTED

 Notary Public
 Judicial Complex Peshawar


 Deponent

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

Service Appeal No: 1010/2023

Mr. Fazal Ur Rehman S/clerk BPS-14 District KohatAppellant

VERSUS

Government of, Khyber Pakhtunkhwa through Secretary (E&SED) &
others.....Respondents

AFFIDAVIT

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

It is Further stated on oath that in this appeal , the answering respondents have neither
been placed ex-parte nor their defense has been struck off/cost.


Deponent

ATTESTED



4
6 ✓

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT.

APPOINTMENT

Appointment of the following candidates is/are hereby ordered against the posts of J/Clerks on temporary and adhoc bases (in N.P.S.5 (Rs. 700-25-1250) plus allowances in the interest of public service with effect from the date of taking over his/their charges.

S.No.	Name and address of candidates	Posted at	Remarks
1.	Faizur Rohman S/O Jabbar Khan R/O Jangle Khel (Kohat)	GHS, Dallen	Vacant post.
2.	Shahid Azam S/O Sher Azam R/O Hayat Shaheed Colony Kohat.	GHS, Chamba Gul M.C.P.	
3.	Tarweez Ahmad S/O Abdul Gaffar Khan R/O B-GHS Kohat.	SDEO (M) HANSU	Vacant post.
4.	Qudrat Ali S/O Munsh Ali R/O Khadzai (Kohat)	GHS, Marai Foyan	.do.
5.	Mujeeb-ur Rehman S/O Umar Fareed R/O Ghurzai Bala (Kohat).	GHS, Darmolak	.do.
6.	Mohammad Zaman S/O Sher Zaman (Ex-serviceman) R/C Sarkidal (Shekardarra) Distt: Kohat.	G.H.S.S, Lachi	.do.

TERMS AND CONDITIONS

- No TA/DA is allowed on fresh appointment/charges reports should be submitted to all concerned in duplicate.
- The appointment of candidates is/are purely temporary and liable to termination at any time without assigning any reasons.
- The candidates should produce his/their health and age certificate etc from Medical Supdt. concerned.
- They/He should be allowed to take over the charge of their/his post if their/his age exceeds 25 years or below 18 years.
- In case of resignation they/he will have to submit one month prior notice or they/he shall facilitate one month pay to Govt.
- His appointment is subject for further condition that they/he is on demerited off N.W.F.P.
- If they/hs fail to take over charge of the post within a week of the receipt of this order the offer of the appointment shall stand cancelled.

(Haji Gul Mohcet Khan)
District Education Officer,
(Male) Kohat. (Secndar)

Erst. No. 2490-25/4 Appointment/Transfer/Clsk: /I-AE. Dated 15/2 Feb 94.

Copy of the above for information to the:
1-5. All Principal, /Headmas & S.D.E.O. (M) concerned,
7-2 Candidate concerned.

Attestd

[Signature]
District Education Officer,
(Male) Sect: Kohat.

[Signature]
Assistant (PS-16)
-D.E.O (Male) Kohat

Attestd

5
4

تاریخ نمبر 23-05 (1)

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 153 مجموعہ ضابطہ فوجداری

شعبہ	کوہاٹ	ACE
تاریخ وقت وقوع معلوم	3	31
1- تاریخ وقت رپورٹ	وقت 11:10 بجے	وقت 11:40 بجے
2- نام و کونٹا اطلاع دہندہ مستفیث	عبد الجلیل ولد فرخ فریق سکس	شادی پور ضلع کوہاٹ
3- مختصر کیفیت جرم (معدومہ) حال اگر کچھ لیا گیا ہو۔	Pe. ACE (2) 161 PR/5	
4- جائے وقوعہ نامہ علاقہ سے درست دفتر سٹیٹ ایجوکیشن انسپکشن KDA کوہاٹ ایف اے لنگ اتر کمانڈ		
5- نام و کونٹا ملازم	فضل الرحمن مندرک	DEO فیک ایجوکیشن کوہاٹ
6- کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو بیان کر		حد خواست شکایتی پر مقدمہ درج رہے گا
7- قانسے روانگی کی تاریخ وقت		لطوریہ سٹیٹ ایجوکیشن

ابتدائی اطلاع نیچے درج کرو۔ مستفیث مندرجہ خانہ ہے جا حضرتی کمانڈ
اکم لوہوں رپورٹ کرتا ہے کہ من مسائل انتہائی غریب اور فیک ایجوکیشن سے مکمل طور پر ملزم رہتا ہے وہ لوہا ہوں
یہ کہ من مسائل نے فیک ایجوکیشن کو سکول کی تعمیر کیے اور فی دی گئی جن میں بطابق اسٹریکٹ لائن
پرانٹ اور اب رہتا ہے وہ لوہا ہوں۔ یہ کہ اب GHS سکول شادی پور میں بطور مکمل طور پر خراب ہے جو ناہم سے
بیٹے اسماعیل خان کا حق ہے، لیکن فضل الرحمن مندرک حکم تعلیم جو سے بیٹے کے لئے کوہاٹ خان
DEO کوہاٹ کے ایس 90000/2 سے لے کر روپیہ بطور رشوت طلب کرتا ہے، جس کو دینے سے نہ چاہتے
ہوئے ہیں میں فیور ہوں جو نام رشوت دینا لیتا ہوں۔ یہ لیتا ہے میں مذکورین باآئینہ ظلمت مقدمہ درج
رہے ہیں کہ ناہم ہوں۔ اور بطور لہجہ ایڈیٹ تیار ہوں میری رپورٹ درج کیا ہے۔ (عبداللطیف)
کارروائی کمانڈ حسب گفتمہ مسائل رپورٹ درج بالا کو ہم سنایا سمجھایا گیا، مدت تسلیم کرتے ہیں رپورٹ خود
دستخط نسبت کی جسکی میں بعد لہجہ کرتا ہوں۔ معقول رپورٹ سے صورت جرم بالا پائی جا کر درج جرم
بالا جا کر بلو کر مرتبہ نمبر 4 حد پیش ہے، یہ کہ نمبر 4 ہے

M. A. A.
Co. ACE
11.11.016

88

گورنمنٹ پبلسٹیشن ہاؤس، لاہور۔ 18/11/2007ء (لاہور، لاہور ہاؤس) عملی نام (پولیس)

پولیس نوٹیفکیشن نمبر ۷۳

فارم نمبر ۲۳-۵۱

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۲ مجموعہ ضابطہ فوجداری

نام: ACE ۳۰
 ضلع: کوہاٹ
 تاریخ وقت وقوعہ معلوم: ۲

۱- تاریخ وقت رپورٹ	۱۱/۱۱/۰۶ وقت ۱۱:۰۰ بجے
۲- نام و صفت اطلاع دہندہ مستفیض	سید امین دلہ خان وزیر مکتبہ لیسٹ
۳- مختصر کیفیت جرم (موردہ) حال اگر کوئی کیا ہو۔	۱۶۱۲۲/۵(۲) Pe. Act
۴- جائے وقوعہ قاصد قاتل سے درست	دفتر ڈسٹرکٹ ایجوکیشن افسر KDA کوہاٹ، انعامیہ ٹیچرستان، غرلانگ، انعامیہ
۵- نام و صفت بلرم	۱) فضل الرحمن ملک ۲) گوہر علی خان DEO حکم ایجوکیشن کوہاٹ
۶- کارروائی جو پیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا تو وجہ بیان کرو	درخواست شناسائی پیر پیر جی ایس ایس کوہاٹ
۷- قاتل سے روائی کی تاریخ وقت	لیٹر سیشن رپورٹ

ابتدائی اطلاع نیچے درج کرو۔ مستفیض مندرجہ خانہ نمبر ۱۱ یا منبری انعامیہ ڈسٹرکٹ پبلسٹیشن کوہاٹ کے من سائل انتہائی مزید حکم ایجوکیشن سے ملا س خور ملازم رٹنا ٹرڈ ہے۔ یہ کہ من سائل نے حکم تسلیم ہو سکوں کی تمہیر کیے اراضی دی تھی جس پیر میں بمطابق انٹرنیٹ بھرتی ہوا تھا۔ اور اب رٹنا ٹرڈ پورٹا ہوں۔ اور یہ کہ اب ڈھونڈ ۹۲۵ خان افضل لیسٹہ خنڈہ میں بطور ملازم خور ملازم بھرتی ہونا میرے بیٹے فرید اللہ نامی ہے۔ لیکن فضل الرحمن ملک نے جو کہ کوہاٹ کو روکنے کے لئے ۹۰۰۰۰/- فیورڈ میں بطور رشوت طلب کیا۔ جسے دینے کے لئے میں نے جاسٹس پورٹ میں فیورڈ ہوں تو لوگ رشوت دینا اور لٹا گناہ گنہمہ اور صرام ہے۔ لیکن اس میں مذکورہ لٹلڈ اندراج مقدمہ جاسٹس پورٹ اور بطور ٹریب ایجنٹ تیار ہوں۔ منبری درخواست دہ کارروائی کیا وے۔ ال سید میں کارروائی گناہ منسب گفتہ سائل رپورٹ صرح بالا ہوں پیر ٹیکر سنا یا و سمعایا تھا کہ دست تسلیم نہ کہ زمین رپورٹ فرورد سٹنٹ تھے جسکی میں تصدیق نہیں ہوں۔ مضمون رپورٹ سے صورت صرح بالا مانا جائے کہ صرح بالا پاک پورٹ نہ کہ ٹریب ٹریب درپیش ہے۔ پیر جی ٹرڈ ہے۔

Massae
Co. ACE. KT
11-11-06

کے
Tested

(Handwritten mark)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHAT

OFFICE ORDER

Mr. Fazaal Ur Rehman, Junior Clerk, Office of the District Education Officer (Male), Kohat, is hereby suspended w/e/f 11/11/2016 under CSR-194 Civil Services Regulations, Revised Edition 2011 involved in a criminal case registered against him under FIR No. 30 & 31 dated 11/11/2016 U/S 161 PPC/5(2) PC Act by Police Station Anti-Corruption District Kohat.

The accused official is therefore entitled to draw the subsistence grant as admissible under FR-53.

District Education Officer

Endst. No. 5954-58 Date 21.11.2016

Copy forwarded for information and similar action to the

- 1. Director E & SE Khyber Pakhtunkhwa Peshawar
- 2. Deputy Commissioner Kohat
- 3. District Accounts Officer Kohat
- 4. Official concerned
- 5. Office order file

(Handwritten signature) 21/11/2016

District Education Officer

Better Copy

7
9

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHAT

OFFICE ORDER

Mr. Fazal Ur Rehman Junior Clerk, Office of the District Education Officer(Male) Kohat, is hereby suspended w.e.f 11.11.2016 under CSR-194, Civil Services Regulations, Revised Edition, 2011 involved in a criminal case registered against him under FIR No. 30 & 31 dated 11.11.2016 U/S 161 PPC/5(2)PC Act by Police Station Anti Corruption District Kohat.

The Accused official is therefore entitled to draw the subsistence grant as admissible under FR-53.

DISTRICT EDUCATION OFFICER

Endst: No. 7954-58

Dated 21-11-2016 ✓

Copy forwarded for information and similar action to the:-

1. Director E & SE, Khyber PakhtunKhwa Peshawar.
2. Deputy Commissioner Kohat
3. District Accounts Officer, Kohat.
4. Official concerned.
5. Office order file.

Sd/-----

DISTRICT EDUCATION OFFICER

Attested
Kam

Attested



DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

Phone: 091-9225340 Fax: 091-9225345

8
33

NOTIFICATION.

Consequent upon the recommendations of Departmental Promotion Committee (DPC) in its meeting held on 24.5.2017, the following Junior Clerks (B-11)/Assistant Store Keepers (B-5)/Lab Assistants (B-7) working in and under the Directorate of E&SE/DC&TE/ FATA/PITE are hereby promoted to the post of Senior Clerks on their own pay and BPS subject to provision of last five (5) years satisfactory PERs and posted/adjusted against vacant post of Senior Clerks in the office/school as noted against each in the interest of public service with immediate effect:-

S.#	Sen #	Name & Desination	Father Name	Present Posting	Adjusted at as S. Clerk on Own Pay & Scale	Remarks
1	2	Chan Shah	Fazal Hussain	GHS Spinkain SWA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
2	3	Muhammad Rafoog	Ahmad yar	GHS Shaboor SWA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
3	5	Habibullah	Awaz Khan	GHS Karikot SWA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
4	8	AHMAD KHAN	GUL MUHAMMAD	GHS Ratta Kulachi DIKhan	GHSS Choudwan DIKhan	Against V/post
5	18	Saad ullah Jan	Shadat Khel	GHS Ganderi Khattak Karak	GHSS Ismail Khel Bannu	Against V/post
6	21	Arifullah	Siffatullah	GHS Muhammad Khel FATA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
7	22	Anwar Baig	Kabir Khan	GHS Mir Azam Kor FR Kohat	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
8	25	Iran Badstah	Khiali Khan	DEO (M) Karak	GHSS Kotka Muhammad Khan Bannu	Against V/post
9	26	Amir Zada	Mohammad Hassan	GHS Loi Sam Bajour Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
10	30	Alamzeb	Subhanuddin	GHS Tiarza SWA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
11	33	Saifur Rehman	Fazlur Rehman	GHS Urmar Bala Peshawar	GGHSS qasimi Mardan	Against V/post
12	34	Mir Hussain	Faqir Hussain	GHS Manahi Nowshera	GGHS Palo Dheri Mardan	Against V/post
13	35	Awal Dad Khan	Seeman Khan	GHS Rahmatabad Karak	GHSS Sikandar Khel Balka Bannu	Against V/post
14	36	Muhammad Sultan	Ali Khan	GHS Shahidan Banda Karak	GHSS Pinda Khel Bannu	Against V/post
15	37	Waheedullah	Manak Khan	GHS Saadullah FR Bannu	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
16	38	Iltaf Hussain	Nazir Hussain	GHS And Khel Orakzai Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
17	39	IRSHAD AHMED	MUFARIQ SHAH	GHS Gul Bahar Pesahawar	GHSS Caryala Mardan	Against V/post
18	41	Faiz Dil	Gul Nawab	GGHS Bahadar Khel Karak	GHSS No. 3 Bannu city	Against V/post
19	42	Said Anwar	Khan Asghar	GHS Pir Sahib Jan Kot NWA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	

Proposal Junior to Senior Clerk OIS (2)

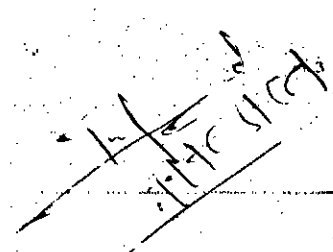
Handwritten signature and stamp
The text "The text" is written diagonally across a stamp area.

20	43	Ikram Ullah	Yaqeen shah	GHS Aza Khel Bala Nowshera	GHSS Dhakara Bunir	Against V/post
21	44	Zahir Hussain	Sabir Hussain	GHS Alizal Kurram Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
22	46	Zahoor Hussain	Gulab Hussain	GHS Khung Alizal Kurram Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
23	54	Khitab Gul	Sardar Khan	GHS Taj Muhammad Kot NWA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
24	57	MUHAMMAD IQBAL	KHAN SHER	GHSS Daag Peshawar	GHSS Kherabad Mardan	Against V/post
25	58	Fahim Ullah Shah	Farhad Ali Shah	Bannu	GHSS Mama Khel Banochi Bannu	Against V/post
26	61	ZAKI ULLAH	FAZALE REHman	GHSS Gul Bahar Peshawar	GHSS Lund Khwar Mardan	Against V/post
27	63	IRSHAD AHMED	FAQEER MUHAMMAD	GGHS Sheikh abad Peshawar	GGHS Bakshali Mardan	Against V/post
28	64	MUHAMMAD IBRAHIM	Malik HABEEB KHAN	GHSS Chamkani Peshawar	GHSS NASEER Kili Mardan	Against V/post
29	65	Altaf Alam	Ghous/ud/Din	GHS Navo SWA	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
30	66	SADDAQAT KHAN	AMRAT KHAN	GGHS Chamkani Peshawar	GHSS Kohi Barmol Mardan	Against V/post
31	69	Amjad Sohail	Mohammad Rafique	GHS Faridi PR Peshawar	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
32	73	Muhammad Afzal	Umeer Khan	GHSS Fatehpur Swat	DEO Male Buner	Against V/post
33	74	MANZOOR ALAM	UMAR KHAN	GHS Berl Bagh Peshawar	SDEO Male Buner	Against V/post
34	76	Musharaf Khan	Amnullah	GHS Paya FR Kohat	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
35	77	MUHAMMAD YOUSAF	BAHADER SHER	GHS Kheo Khel Pacca	DEO Male Lakki	Against V/post
36	78	Lal Hakim	Din Muhammad	GHS Lot Sam Bajour	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
37	82	Jehanzeb	Rahim Jan	GHS Zor Bandar Bajour Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
38	84	Tajir Hussain	Mohib Hussain	GHS Kani Alizal Kurram Agency	Service placed at the disposal of DE (FATA) Peshawar	
39	85	Rashid Ahmad	Habib/Ur/Rahman	GHSS Shahpur Shangla	GHSS Nogram Buner	Against V/post
40	89	SOHAIL AHMAD	ABDUL YUM	GGHS shahcen camp Peshawar	GHSS Maneri Payan Swabi	Against V/post
41	90	Hasan Zeb	Rangeen Mian	GHS Malra Shangla	GHSS Ghurghushto Buner	Against V/post
42	93	Bakht Zamin	Habib Hassan	GHS Tangora Buner	GHSS Ghazi Kot Buner	Against V/post
43	98	Habib Said	Mohammad Said	GHS Yousaf Khel Mohmand Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
44	100	Riaz Gul	Hazrat Gul	GHS Suhan Khwar Mohmand Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
45	109	Hassan Gul	Zarin Gul	GHS Mali Khel Bala Nowshera	GHSS Naro Bonda Swabi	Against V/post
46	114	S.Akhtar Jan	S.Hussain Gul	GGHS Kurez Orakzai Agency	Service placed at the disposal of DE (FATA) Peshawar	
47	116	Abdur Raziq	Wasil Bad Shah	GHS Tor Dhand Karak	GHSS Hakim Haved Bannu	Against V/post

[Handwritten signature]

48	141	AMBER KHAN	UMAR KHAN	GHSS Hazar Khwani Peshawar	GHSS Dobian Swabi	Against V/post
49	146	Amir Shah	Shah Jehan	AEO Mohmand Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
50	159	Jahan Zeb Khan	Mir Ahmad Khan	Karak	GHSS Salima sikandar khel Bannu	Against V/post
51	164	Iftikhar Ahmad	Sardar Khan	GHS Ahmadabad Karak	GHSS Domail Bannu	Against V/post
52	170	Gul Hussain	Mohammad Hussain	GHS Subhan Khwar Mohmand Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
53	172	Azhar Mehmood	Muhammad Suleman	GHSS Nawar Shehr A.Abad	GHSS Adeena Swabi	Against V/post
54	173	Najeebullah	Nasir Khan	GHS Sra Shah Muhmand Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
55	175	Basher Hussain	Sharif Hussain	GHS Teri Mangal Kurram Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
56	178	Malik Shah Nawaz	Malik Abdul Qayyum	GHS Dehinda Haripur	GHSS Sheikh jana swabi	Against V/post
57	192	Rohal Amin	Hidaytur Rahman	GHS Gokand Buner	GHSS Bagh Buner	Against V/post
58	195	ZAFAR IQBAL	MUHAMMAD IDREES	GHS Sardar Garhi Peshawar	GHSS Sikandar Swabi	Against V/post
59	197	Ibrahim	Abdul Akbar	GHS Lol Shalman Khyber Agency	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
60	203	Muhammad Tariq Mahmood	Israr ud Din	GHSS Risalpur Nowshera	GHSS Naranji swabi	Against V/post
61	207	Abdul Wali	Gul Wali Khan	GHS Sitti Killa FR Bannu	Service placed at the disposal of DE (FATA) Peshawar for further adjustment	
62	210	Ayaz Mohammad J/C	Malik Aman	GHS Gujrat Mardan	GHSS Gadar Mardan	Against V/post
63	220	Fazal Rehman	Jabbar Khan	DEO (M) Kohat	DEO Male Hangu	Against V/post
64	228	MUHAMMAD JAHANGIR	SHER AFZAL	GHSS Irrigation colony Peshawar	Services placed at the disposal of DEO Female Buner for further adjustment	
65	229	ZULFIQAR ALI	MUHAMMAD RAFEEQ	GHS Sardar Garhi Peshawar	Services placed at the disposal of DEO Female Buner for further adjustment	
66	269	Iqbal Muhammad	Dildar Muhammad	GHSS Jangle Khel Kohat	DEO Female Hangu	Against V/post
67	270	Akhtar Zaman	Hayat Ullah	SDEO-F Takht Nasrati Karak	GHSS NO. 3 Bannu city	Against V/post
68	276	Angoor Shah	Udin Shah	Karak	GHSS Amandi Umar Khan Bannu	Against V/post
69	285	Ayub ur Rehman	Shaisat Khan	Karak	GHSS Domel Bannu	Against V/post
70	287	Muhammad Shafique	Sheikh Ahmed	GHS No.4 A.Abad	Services placed at the disposal of DEO Female Buner for further adjustment	
71	291	Saghir Khan	Munir Khan	GHS Mang Haripur	Services placed at the disposal of DEO Female Buner	
72	293	Rashid Iqbal	Muhammad Junaid	GHS Tosin Swat	Services placed at the disposal of DEO Female Buner for further adjustment	
73	304	Abdul Qadir	Sain Khan	GHS Jaba Mansehra	GHSS Luqman Banda Dir Lower	Against V/post
74	307	Muhammad Ali	Faqir M. Khan	AD Exam PITE Peshawar	GHSS Munda Dir Lower	Against V/post
75	312	HAZRAT REHMAN	SHER HASSAN	Malakand	Services placed at the disposal of DEO Female Buner for further adjustment	

Proposal Junior to Senior Clerk O/S (2)



36

Notes:

1. The above mentioned Junior Clerks/Laboratory Assistants/Assistant Store Keepers are promoted as Senior Clerk on their own pay & scale. They will be promoted to the post of Senior Clerk (B-14) on regular basis subject to provision of satisfactory PERs for the period of last 5 Years coupled with non-involvement certificate.
2. In case of non-provision/ supply of satisfactory PERs in r/o Junior Clerks falling in category at S.No.1 above disciplinary action may be initiated against them.
3. The immediate bosses are directed to relieve them immediately and direct to report for duty at their new stations immediately and to furnish ACR/PER for last five years of the said officials for the purpose of their regular promotion as Senior Clerk by the DPC of E&SE Department Khyber Pakhtunkhwa Peshawar.
4. Compliance report of each official may be provided immediately.

(Muhammad Rafiq Khattak)

DIRECTOR

Endst: No 4870-82 /A-23/MS/Promotion JC to SC/ 2017. Dated Peshawar the 30/6/2017

Copy of the above is forwarded for the information and necessary to the:-

- 1) Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2) Director Curriculum & Teacher Education, Khyber Pakhtunkhwa, Abbottabad.
- 3) Director of Education (FATA) Peshawar.
- 4) Director PITE, Khyber Pakhtunkhwa, Peshawar.
- 5) District Education Officers (Male & Female) concerned.
- 6) Agency Education Officers concerned.
- 7) District Accounts Officers concerned.
- 8) Principals/ Headmasters/Headmistress concerned.
- 9) Sub: Divisional Education Officers (Male & Female) concerned.
- 10) Assistant Director (Exam) at PITE Peshawar.
- 11) Officials concerned.
- 12) PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
- 13) PA to Additional Director (Estab) E&SE Khyber Pakhtunkhwa, Peshawar.
- 14) Master File.

aw/lat
30/6/2017

Assistant Director (Admn)
Directorate E&SE Khyber Pakhtunkhwa
Peshawar

File
Accepted

- withdrawal order of appeal 12
39

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
Notification.

Consequent upon refusal of following Junior Clerks to accept promotion to the post of Senior Clerk, their promotion as Senior Clerk issued vide its office under Enclst No. 4870-S2/A-7/VMS/Promotion LC to SC/2017 dated 30-6-2017 is hereby withdrawn on their own written request to forego their promotion except No 8 who is involved in disciplinary case.

Sr. No.	Name & Desig.	Father's Name	Present Post	Address Under promotion as SClerk	Remarks
1	11/33 Saifur Rahman J/Clerk	Fazlur Rahman	GHS Umar Bala Peshawar	GGHSS Qasim Mardan	Refused promotion
2	12/31 Mir Housain J/Clerk	Faqir Hussain	GHS Marahli Nowshera	GGHSS Pao Dheri Mardan	Refused promotion
3	27/63 Ishaq Ahmad J/Clerk	Faqir Muhammad	GGHS Sheikhabad Peshawar	GGHSS Bahshali Mardan	Refused promotion
4	28/64 Muhammad Ibrahim J/Clerk	Mallik Hakeem Khan	GHSS Chamkani Peshawar	GHSS Nasser Kili Mardan	Refused promotion
5	20/66 Sadat Khan J/Clerk	Amrat Khan	GGHSS Chamkani Peshawar	GHSS Koli Bannol Mardan	Refused promotion
6	37/71 Manzoor Alam J/Clerk	Umar Khan	GHS Beri Bagh/GHS Akhmadabad Peshawar	SDEO (M) Duner	Refused promotion
7	45/101 Hassan Gul J/Clerk	Zarin Gul J/Clerk	GHS Mall Khel Bala Nowshera	GIDD Naro Banda Swat	Refused promotion
8	6/V220 Fazal Rahman J/Clerk	Jabbar Khan	DEO (M) Kohat	DEO (M) Hangu	Involved in Disciplinary Case

- Note: 1. Since the above mentioned officials declined in writing to accept promotion, they shall not be considered for promotion for the next 01 years following the order in pursuance of Govt of Khyber Pakhtunkhwa, Establishment Department (Regulation Wing) No. SCRA/14/AM/17/2017/Vol-VIII dated 22-10-2017.
2. Entry to this effect should be made in their service book.

DIRECTOR
 Elementary & Secondary Education
 Khyber Pakhtunkhwa, Peshawar

Dated Peshawar the 06/8/2017

Enclst. No. 4992/1006/18-2/VMS (Refusal) J-Clerks

Copy forwarded to the -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (Male & Female) Concerned
3. District Accounts Officers concerned
4. Principal concerned
5. Official Officer concerned
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
7. M/FILE.

DFOCM, Kohat.

M
 Assistant Director (Admin)
 Directorate of Elementary & Secy. Education
 Khyber Pakhtunkhwa, Peshawar

Filed
 Attested

Better Copy

39

12

Directorate of Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar

Notification

Consequent upon the refusal of the following Junior Clerks to accept promotion to the post of Senior Clerk, their promotion as Senior Clerk issued vide this office under Endst: No. 4870-82/A-23/MS/Promotion J-C to SC/2017 dated 30-06-2017 is hereby withdrawn on their own written request to forgo their promotion except S: No. 8 who is involved in disciplinary case.

S#	Sen: No	Name & Desg	Father's Name	Present post	Address under promotion as S/Clerk	Remarks
1	11/33	Saifur Rehman J/Clerk	Fazal Rehman	GHS Umar Bala Peshawar	GGHSS Qasimi Mardan	Refused promotion
2	12/34	Mir Hussain	Faqir Hussain	GHS Manahi Nowshera	GGHSS Pao Dheri Mardan	Refused promotion
3	27/63	Irshad Ahmad J/Clerk	Faqeer Muhammad	GGHS Sheikhabad Peshawar	GGHSS Bakhshali Mardan	Refused promotion
4	28/64	Muhammad Ibrahim J/Clerk	Malik Habin Khan	GHS Chamkani Peshawar	GHSS Naseer Killi Mardan	Refused promotion
5	30/66	Sadaqat Khan J/Clerk	Amrat Khan	GGHSS Chamkani Peshawar	GHSS Kohi Barmol Mardan	Refused promotion
6	33/74	Manzoor Alam J/Clerk	Umar Khan	GHS Beri Bagh/GHS Akhunabad Peshawar	SDEO (M) Buner	Refused promotion
7	45/109	Hassan Gul J/Clerk	Zarin Gul J/Clerk	GHS Mali Khel Bala Nowshera	GHDD Naro Banda Swabi	Refused promotion
8	63/220	Fazal Rehman J/Clerk	Jabbar Khan	DEO (M) Kohat	DEO (M) Hangu	Involved in Disciplinary case.

- Note: - 1. Since the above mentioned officials declined in writing to accept promotion, they shall not be considered for promotion for the next 04 Years following the order in pursuance of Govt: of Khyber Pakhtunkhwa, Establishment Department (Regulation Wing) No. SOR-VI(E&AD)-3/2009/Vol-VIII Dated 22-10-2011.
2. Entry to this effect should be made in their service book.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 999-10/A-23/MS Refusal J-Clerk

Dated Peshawar the 04/08/2017

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Male & Female) Concerned.
3. District Accounts Officer concerned.
4. Principal concerned.
5. Official/Officer concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. M/File.

Assistant Director (Admn:)
Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar

Attested

تعلیم حکم آرڈر شدت نمبر 39 آف 2020، بعد الذمات سیشن جج ایچ آر سیشن صوبی اصلاح و ترقی نون منام کوہاٹ
① فضل الرحمن ولد جبار خان سکندھ سیشن جج کوہاٹ (طرن حکمہ ایجوکیشن کوہاٹ)
② نوید علی ولد محمد علی سکندھ حضانہ سیشن جج کوہاٹ 10-11-2016 میں حیات آباد ریشادہ DEO حکمہ ایجوکیشن کوہاٹ

ORDER NO. 39
02.09.2020

نفاذ ACB کوہاٹ 16/PPC
SC2) PL Act
11 فورسز 2016
قعدہ نمبر 05

Both the accused officials along with counsel present. Learned Sr. PP representing the State is also in attendance.

13

The accused/petitioners had earlier (on 22-07-2020) moved this Court through the application in hand for their acquittal under Section 249-A of the CrPc on the ground of there being no probability of their conviction on conclusion of their trial in light of whatever evidence the prosecution had brought on record against them. The State was put on notice following which arguments from both sides were heard and the case file examined. It transpired on perusal of the record that whatever evidence had till then been brought on record by the prosecution, was enough to enable this court to form an opinion about the probability, or the lack of it, so to say, that the accused/petitioners will or will not be convicted in this case.

40

The prosecution's case as spelt out in the FIR No.02 is that the complainant Said Amin through an application dated 11-11-2016 addressed application to the CO ACE Kohat, submitted that he was poor and retired class-IV official of the Education Department and donated land to Education department for the purpose of construction of school, upon that agreement he was recruited and now retired. According to class-IV employees son quota his son Farid Ullah is entitled for the said job of Naib Qasid in the said school but clerk Fazal Rehman demanded Rs.90,000/- as a bribe which he was not ready to pay and requested for legal action.

An application was submitted by CO ACE Kohat in the court of Senior Civil Judge, Kohat for deputing a Trap Magistrate, who was pleased to nominate Judicial Magistrate/Civil Judge-IX Kohat for the purpose. According to the trap report, Rs.90,000/- currency notes consisting of 20 notes of Rs.1000/- denomination and 140 notes of Rs.500/- denomination were initiated by the raiding Magistrate which were given to Abdul Jalil and 80 notes of Rs.1000/- denomination, 20 notes of Rs.500/- denomination were given to Said Amin the complainants of this case & of F.I.R. No.02 of the even date. The raiding Magistrate alongwith CO, Ali Hassan, Constable Shokat Ali and Sajjad ur Rehman proceeded to D.I. office Kohat at 12:30 PM, where complainant had allegedly given the legal gratification mentioned above to accused Fazal Rehman Clerk for on wards payment to accused Gohar Ali DEO and

It is noted to be the copy.
Anti Corruption Cell
Camp Kohat

10.10.2020

14

then the raiding Magistrate raided and recovered the money from the drawers of the table of Fazal Rehman accused in his office and thus the case was registered, the accused were arrested and subsequently the case was challaned to this court for trial.

After completion of investigation, complete challan of the case was submitted in Court for trial and the accused facing trial were summoned, who appeared in compliance. Copies of the documents made available against them by the prosecution, were provided to them as required under the law and formal charge against the accused/petitioners was framed on 30-11-2017 to which they pleaded not guilty and claimed trial.

The prosecution was called upon to produce its witnesses, which it did by producing three witnesses including two of its star witnesses namely Ali Hassan Khan (IO) and complainant Said Amin who had their statements recorded as PW-2 and PW-3 respectively. The testimonies of these witnesses prompted the defense to move this Court for acquittal of the accused/petitioners u/s 249-A CrPC. The stance taken by the defense was that in light of testimonies of the two witnesses produced by the prosecution, the fate of this case stands decided and there remains no probability of them being convicted on conclusion of their trial. Reason being, the admissions made by these witnesses in the course of their cross examinations.

Arguments on that application were heard as well as recourse to the law was also had and from perusal of the record it transpired that, it is a fact that the two witnesses referred to above who happened to be star witnesses of the prosecution have made so many admissions that are so contradictory to the case of the prosecution as spelt out in the FIR that these strike at the root of the prosecution's case thereby making the fate of the case clear as to there being no probability of the single accused/petitioner facing trial namely Fazal Rehman being convicted for the offence for which he is charged. As for co-accused Gohar Ali DEO. The record reveals that he has already been exonerated from the charges leveled against him by the prosecution in the course of investigation. What is more, it appears that the learned Judicial Magistrate laying the trap had not himself witnessed the money changing hands nor had he heard any conversation between the accused and complainant which fact is evident from the trap report as no such circumstance was mentioned therein. Although the record does not contain copies of currency notes admittedly those were not recovered from the personal possession of

Special Judge
Anti Corruption
Camp Court, Khair
Said Amin
Ali Hassan Khan
Gohar Ali DEO

14/11/17

12

15

accused rather were lying in the drawer of his table of the accused. Similarly, it is mentioned in the trap report that the currency notes were initialed by the Magistrate laying the trap but none of photocopy of the notes is available on record which could show the initial of learned Magistrate.

What is more, although a material witness of the prosecution witness i.e. the learned Judicial Magistrate heading the raiding party of the Anti-Corruption Staff at the time of recovery of the tainted currency is yet to be examined but in light of the testimonies of the complainant and the IO which are available on the record, this court deems it an exercise in futility and wastage of the time of this court as well as that of the witness to summon and examine him since it is clear to the court that there remains no probability of the conviction of the accused/petitioner even if testimony of the remaining witnesses is taken. To top it all up, it is also a fact on record that the CO ACE has neither prayed for nor even approached the forum spelt out by the law for nomination and deputation of the learned JM, who headed the raiding party as it is on record that the application was made to SCJ and not to the learned D&S Judge, who is competent in law.

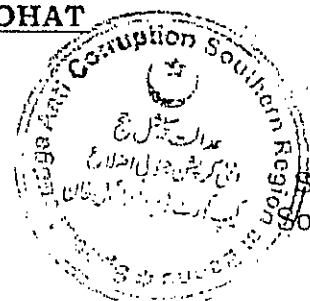
For what has been discussed above, this Court comes to the conclusion that the application of the petitioners is genuine. Reason being the fact that, in light of the evidence brought on record so far by the prosecution, there appears no probability of the accused/petitioners being convicted for the offence for which he is charged.

This being the case the application in hand is hereby accepted and the accused/petitioners are acquitted of the charge leveled against him in exercise of power of this court conferred u/s 249-A of the CrPC. Bail bonds furnished by the accused/petitioners stand cancelled and his sureties are absolved of their liabilities under their bonds. Case property if any, be kept intact till the lapse of time for appeal/revision and shall thereafter, be disposed off according to law.

File of this Court be consigned to the record room after its completion and compilation.

ANNOUNCED AT KOHAT

02-09-2020



Ihsanullah Khan Mansud
Ihsanullah Khan Mansud,
Special Judge-Anti-Corruption,
Southern Districts, HQ at Bahawalpur,
Camp Court Kohat
2/9/20

*Accepted to
File CO M.
Special Judge
Anti-Corruption Southern
Region
Camp Court Kohat*

M.P. 11/9/20



16

**OFFICE OF THE DISTRICT
EDUCATION OFFICER (MALE) KOHAT**



NOTIFICATION:

1. ✓ WHEREAS Mr. Fazal Rehman Junior Clerk Office of the DEO (Male) Kohat was suspended due to FIRs No.2 & 3 dated 11/11/2016 under Section 161 PPC/5(2) PC Act by the Police Station ACE Kohat for the charges mentioned in the FIRs.
2. AND WHEREAS Director E&SE Khyber Pakhtunkhwa Peshawar constituted an inquiry committee comprising Mr. Hussam Ul Haq Principal B-19 GHS No.3 Kohat as Chairman, Mr. Mumtaz Husain Principal B-19 GHSS Muhammad Zai & Mr. Abdul Hakim Principal B-19 GHSS Lachi Kohat as members of the Committee vide No. 3379-84/ A-23/MS/Appeal/ Fazalur Rehman/J/Clerk dated Peshawar the 08/06/2020.
- ✓ 3. AND WHEREAS the Inquiry Committee recommended to reinstate him vide No. 743/Enquiry dated 17/06/2020.
4. AND WHEREAS Director E&SE Khyber Pakhtunkhwa Peshawar directed DEO (Male) Kohat to implement the Inquiry Committee recommendations vide No. 6680/F.No.81/A-23/MS/Appeal/ Fazal Rehman Kohat dated Peshawar the 26/06/2020.
5. AND WHEREAS the Honorable Court of Special Judge Anti Corruption Sothern Districts, Headquarter Bannu Camp Court Kohat has decided the case and acquitted of the charges leveled against him on 02/09/2020.
6. AND WHEREAS the guidance for reinstatement sought from Director E&SE Khyber Pakhtunkhwa Peshawar vide this Office No.3967/Fazal Rehman JC dated 15/09/2020.
7. AND WHEREAS Director E&SE Khyber Pakhtunkhwa Peshawar asked this office to implement the Court Judgment vide No.3045/F.No/A-23/MS/Fazal Rehman JC/Kohat dated 18/09/2020.
8. NOW, THEREFORE, the Undersigned being a Competent Authority is pleased to Re-Instate Mr. Fazal Rehman Junior Clerk of this Office w.e.f 11/11/2016 in his own Pay and Scale with all back benefits. ✓

**DISTRICT EDUCATION OFFICER
(MALE) KOHAT**

Endst: No. 4150-53 Dated Kohat the 22/9/2020

Copy of the above is forwarded to the:-

- ✓ 1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Kohat.
3. Accountant Local Office.
4. Mr. Fazal Rehman Junior Clerk DEO (M) Kohat.

DY: DISTRICT EDUCATION OFFICER
(MALE) KOHAT

40/17

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**
Phone No. 0919225144 Email ddadmn ese@gmail.com

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee (DPC) in its meeting held on 17-09-2020, the following junior clerks (B-11) working in and under the Directorate of E&SE/DC&TE/PITE/NMTD are hereby promoted to the post of Senior Clerk (B-14) on regular basis and posted/adjusted/shuffled against vacant post of Senior Clerk (B-14) in the office/institutions as noted against each in the interest of public service with effect from the charge assumption of the newly promoted Assistants.

Ser No	Name	Father's Name	Present station	Proposed	Remarks
1	M/Zul Zareen	Muhammad Miskin	GHS Kantial Abbottabad	DCTE Abbottabad	A.V.P
2	Abdul Jameel	Abdul Bari	GHSS Qalandar Shangla	DEO Female Shangla	A.V.P
3	Abdullah Khan	Muhammad Shah	SDEO (F) Takhti Nasrati Karak	SDEO (F) Takhti Nasrati Karak	A.V.P
4	Alaamzeb	Subhanuddin	GHS Azam Warsak SWTD	Service placed at the disposal of DEO SWTD for further adjustment	
5	Irshad Ahmad	Mufariq Shah	GGHS Gulbahar Peshawar	GGHS Gulbahar Peshawar	A.V.P
6	Matiullah	Habibullah	GHS Khecha Sub Div Jandola Tank	DEO Female Tank	A.V.P
7	Shah Nawaz Khan	Haji Danaish	GGHSS Civil Colony Peshawar	Directorate NMD Peshawar	A.V.P
8	Miranshah	Muhibullah	GHS Pir Tangi Sub Div: Jandola Tank	DEO Female Tank	A.V.P
9	Muhaammad Ismail	Muhammad Qahar	GHSS Shapur Shangla	GHSS Shapur Shangla	A.V.P
10	Mumtaz Ali	Shamasul Qamar	GHS Asota Sharif Swabi	DEO (F) Swabi	A.V.P
11	Amir Ullah Khan	Muhammad Zar Ali Khan	GHS Sedghi Many Khan SDW Bannu	GHS Domel Bannu	A.V.P
12	Sher Ali Khan	Gulab Shah	GGHS Thral Dir Lower	SDEO Female Samar Bagh Dir Lower	A.V.P
13	Sharifullah	Sher Ghazi Khan	GHS Shagram Chitral Upper	GHS Shagram Chitral Upper	A.V.P
14	Rahmat Illahi	Zindaganl	GGHS Mustaj Chitral Upper	Service placed at the disposal of DEO(F) Upper chitral for further adjustment	A.V.P
15	Hassan Gul	Zarin Gul	GHSS Mall Khel Bala Nowshera	GHSS Mall Khel Bala Nowshera	A.V.P
16	Noor Zali Khan	Nazar Ali Khan	GGHS Bazar Ahmad Khan Bannu	GGHSS No.2 Bannu	A.V.P
17	Fazal Rehman	Jabbar Khan	DEO Male Kohat	GHSS Muslim Abad Kohat	A.V.P
18	Bulbul Aziz	Ali Rahmat	GGHS Booni Chjital Upper	DEO Female Upper Chitral at Boni	A.V.P
19	Amanullah	Faiz Muhamamad	GHS Potah DIK	GHSS No.2 DIKhan	A.V.P

Attested

Sl. No	Name	Present station	Proposed	Remarks
479	Muhammad Islam S/C	GCMHS Mardan	GGHSS Chamdheri Mardan	A.V.P
480	Zuhra Mumtaz J/Clerk	GGHSS Bannat Dabgari Peshawar	GGHSS Hayatabad Peshawar	A.V.P
481	Javid Khan J/Clerk	GGHS Spilano Kass Jamrud	GGHS Jamrud	A.V.P
482	Muhammad Inam J Clerk	GHS Ghakho Orakzai	GGHSS Chalcho Orakzai	A.V.P
483	Muhammad Rizwan J Clerk	GGHS Urmur Miaha Peshawar	GGHSS Begum Shahabudin Peshawar	A.V.P
484	Arshad Iqbal J/Clerk	GHS Teri Karak	SDEO Male B.D Shah Karak	V.S No. 463
485	Abbas Khan Junior Clerk	Working against S.Clerk post GHS Khair Abad	SDEO Female Mardan	A.V.P
486	Muhammad Tufail Khan J Clerk	GHS Mera Urmur Payan Peshawar	Directorate of E&SE, KPK	A.V.P
487	Muhammad Abbas J Clerk	GHS Marghund Swabi	GGHSS Kalo Khan Swabi	A.V.P
488	Wisal Khan Junior Clerk	GHSS Ahmad Khel Peshawar	GGHS Bannat Dabgari Peshawar	A.V.P
489	Sharif Ullah Senior Clerk	GHSS Darosh Lower Chitral	GGHS Shiaqotak Lower Chitral	A.V.P
490	Awais Waheed Junior Clerk	GHS Khair gali Abbottabad	GGHS Uper Kial Abbottabad	A.V.P
491	Latifullah S/C	GGHSS Larama Peshawar	Directorate of E&SE, KPK	Against vacant post of KPO
492	Muhammad Safdar KPO	Directorate NMD	DEO Khyber	Against vacant post of KPO
493	Sajid Mehmood S/Clerk	RITE Male Mardan	GHSS Nawan Sher Abbottabad	A.V.P
494	Awal Sardar S/Clerk	GHSS Khojaki Karak	GHSS Warana Karak	A.V.P
495	Muhammad Usman J/Clerk	GHS Charsadda Khass	GCMHS Charsadda	A.V.P
496	Jan Bakht Said S/Clerk	GCMHSS Timergarah Dir Lower	Services placed at the disposal of DEO Female Dir Lower for further adjustment	
497	Faisal Saleh Hayat J/C	GCMHS Tehkal Bala	SDEO (F) Town-III Peshawar	Against Account Assistant post
498	S: Muhammad Hassan J/C	DEO Male Hangu	GHSS Lodhi Khel Hangu	A.V.P

Note:-

- Charge report should be submitted to all concerned
- All the DEO (M&F) are directed to hand over charge to the newly promotee S/Clerk in the station mentioned against each if the said post is filled by your office the same may please vacated for the newly promote persons.

Handwritten signature/initials
Attested

Dr Hafiz Muhammad Ibrahim
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 931790-931370/A-23/MS/Promotion JC to SC/2020 Dated 15/02/2021

42 19

Copy of the above is forwarded for the information and necessary to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Director Curriculum & Teaching Education Khyber PakhtunKhwa Abbottabad
3. Additional Director of Education (Newly Merged Tribal Districts) Peshawar
4. Director PITE Khyber Pakhtunkhwa Peshawar
5. District Education Officer (Male and Female) concerned
6. District Account Officer Concerned.
7. Principals/Headmasters/Headmistress concerned.
8. Sub Division Education Officer (Male & Female) concerned.
9. Official concerned.
10. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
11. Master file.

15/2/2021

Assistant Director (Admn)
E&SE Khyber Pakhtunkhwa, Peshawar

~~Attested~~



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

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. M. Tufail Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 101/23 Titled Fazal ur Rehman.


Director

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.