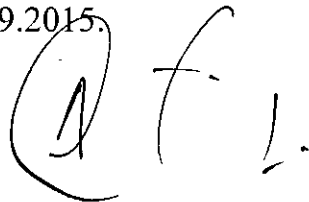


Sr. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	17.09.2015	<p data-bbox="613 418 1409 498" style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, <u>PESHAWAR.</u></p> <p data-bbox="792 544 1122 582" style="text-align: center;">Appeal No. 1275/2014</p> <p data-bbox="623 630 1425 710" style="text-align: center;">Mst. Abida Parveen Versus The Government of Khyber Pakhtunkihwa through Chief Secretary, Peshawar etc.</p> <p data-bbox="760 756 954 793" style="text-align: center;"><u>JUDGMENT</u></p> <p data-bbox="613 839 1474 1128" style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER.-</u> Counsel for the appellant (Mr. Noor Muhammad Khattak, Advocate) and Assistant Advocate General (Mr. Kabeerullah Khattak) with Javed Ahmad, Supdt. for the respondents present.</p> <p data-bbox="613 1224 1474 1847">2. Appellant Mst. Abida Perveen was posted as Deputy District Officer (Female) Takht Bhai District Mardan vide order dated 27.2.2012. She was transferred as SDEO (F) Batkhela Malakand Agency vide order impugned dated 17.10.2014. According to the appellant her departmental appeal dated 26.10.2014 was not responded, hence this service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p> <p data-bbox="613 1973 1295 2010">3. Arguments heard and record perused.</p> <p data-bbox="613 2099 1474 2388">4. The appellant was posted as Deputy District Officer (Female) Takht Bhai vide order dated 27.2.2012 wherefrom she was transferred to Malakand vide impugned order dated 17.10.2014. It is evident that long ago she had</p>

completed her tenure of two years at Takht Bhai. The learned counsel for the appellant submitted that the appellant is female and because of political influence she has been victimized. In this respect he referred to letter No.SO(S/F)E&SE/4-17/2014/Abida Parveen SDEO(F) Takht Bhai, Mardan dated 14.5.2014 and stated that the local MPA was not happy with the appellant who had also complained in the Standing Committee Meeting of the Government. This letter of 14.5.2014 is <sup>prior to</sup> ~~after~~ lapse of 5 months of the impugned order. It is thus evident that the impugned order is not directly the result of any influence or victimization. The appeal being devoid of merit is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

17.9.2015.




(ABDUL LATIF)  
MEMBER



(PIR BAKHSH SHAH)  
MEMBER

17.08.2015

Clerk of counsel for the appellant, M/S Khurshid Khan, SO and Javed Ahmed, Supdt. alongwith Addl: A.G for respondents present. Learned counsel for the appellant is not in attendance today therefore, case is adjourned to 26.08-2015 for arguments. Till then status-quo be maintained.

  
Member

26.08.2015

Junior to counsel for the appellant and Mr. Muhammad Jan, GP with Khursheed Khan, SO and Javed Ahmad, Supdt. for the respondents present. Learned Senior counsel was present at earlier time of the court but he left the Tribunal lateron. Since the matter pertains to posting/transfer and interim relief has been granted, therefore, last opportunity is given to counsel for the appellant for arguments. Office is directed to fix the case at the top of cause list. To come up for arguments on 31-08-2015. Till then status quo is extended. *Last opportunity given to appellant. The date was fixed per diary of learned Counsel for the appellant.*

  
MEMBER

  
MEMBER

31.08.2015

Clerk of counsel for the appellant and ~~Asst:~~ AG for respondents present. Clerk of counsel for the appellant requested for adjournment due to General strike of the Bar. To come up for arguments on 18-09-2015. Till then status quo is extended.

  
Member

  
Member


10 17.04.2015

Counsel for the appellant and Mr. Khurshid Khan, SO alongwith Additional Advocate General for respondents present. Written statement as well as reply to stay application submitted. The appeal is assigned to D.B for rejoinder and hearing on stay application as well as final hearing for 7.5.2015. Till then status-quo be maintained.

  
Chairman

11 07.05.2015

Counsel for the appellant and Addl. A.G for respondents present. Rejoinder submitted. Arguments could not be heard due to leave of Member (Judicial). To come up for arguments on stay application as well as final hearing on 23.6.2015. Till then status-quo be maintained.

  
Member

23.06.2015

Clerk to counsel for the appellant and Addl. AG for the respondents present. Arguments could not be heard as learned Member (Judicial) is on leave. To come up for arguments on stay application as well as final hearing on 17.08.2015. Till then status-quo be maintained.

  
Member

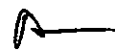
Amended Appeal No. 1275/2014  
Mst. Abida Parveen

8. 02.03.2015

Appellant's Counsel  
M/S Khurshid Khan  
SO for respondents  
No. 1 and 2

Counsel for the appellant and Asst: AG for the respondents present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned order dated 17.10.2014, whereby the appellant was transferred as SDEO (F) Batkhela Malakand from the post of SDEO (F) Takht Bhai Mardar prematurely. Against the above referred impugned order appellant filed departmental appeal on 26.10.2014, which was not responded within the statutory period and hence the amended service appeal on 17.02.2015.

Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 24.03.2015 before S.B. Notice of stay application be also issued for the date fixed. Till the next date Status-quo will be maintained.

  
Member

24.03.2015

Appellant with counsel, M/S Khurshid Khan, SO for respondents No. 1 and 2 and Mosam Khan, AD for respondent No. 3 alongwith Addl: A.G present. Requested for adjournment. To come up for written reply/comments on 17.4.2015 before S.B. Till then status-quo be maintained.

  
Chairman

6.

Reader Note:

08.01.2015

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned 17.02.2015 for the same.

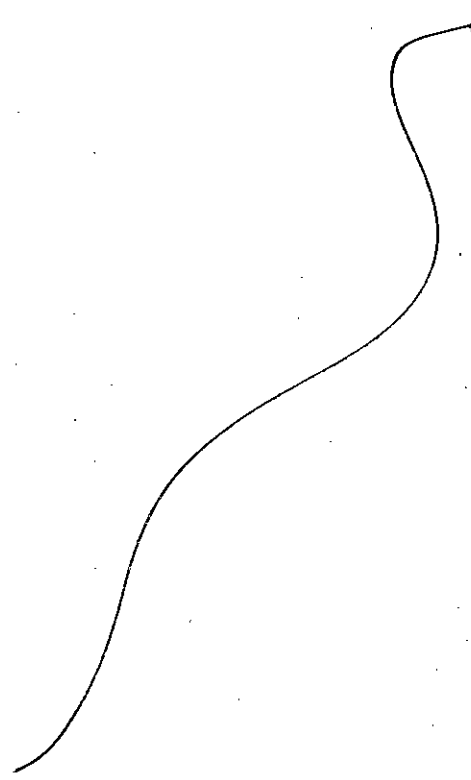
  
Reader

7.

17.02.2015

Assistant to counsel for the appellant and Asst: AG for the respondents present. Mr. Noor Muhamad Khattak, Advocate filed Wakalat Nama on behalf of the appellant as well as application for allowing amended appeal alongwith the amended appeals with spare sets. Application allowed. To come up for further preliminary hearing on 02.03.2015

  
Member



3.  
28.10.2014

Appellant alongwith her counsel present. Preliminary arguments partly heard and case file perused. Perusal of case file reveals that the appellant has impugned order dated 17.10.2014 against which she filed the instant appeal on 22.10.2014 without filing the departmental appeal before the Competent Authority.

Since the question of maintainability is involved therein for determination by this Tribunal, therefore, pre-admission notice be issued to the AAG/GP to assist the Tribunal on the point of maintainability by next date. To come up for preliminary hearing on 12.11.2014.



Member

4.  
Reader Note:

12.11.2014

No one is present on behalf of the appellant. Since the Tribunal is incomplete, therefore, case is adjourned to 11.12.2014 for the same.



Reader

5.  
Reader Note:

11.12.2014

Assistant to counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 08.01.2015 for the same.




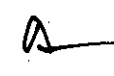
Reader

Form- A

FORM OF ORDER SHEET

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

Case No. 1275/2013

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	24/10/2014	<p>As per direction of the worthy Chairman the present appeal filed by Mst. Abida Perveen through Mr. Nasir Mahmood Advocate may be entered in the Institution Register and put up to the Primary Bench for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	28-10-2014	<p>To come up for preliminary hearing on 28-10-2014</p> <p style="text-align: right;"> MEMBER</p>




The appeal of Mst. Abida Perveen SEDO Takht Bhai Mardan received today i.e. on 22.10.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copies of departmental appeal and its rejection order are not attached with the appeal which may be placed on it.

No. 15-16 /S.T,


Dt. 22/10/2014.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Nasir Mahmood Adv. Peshawar.

In reply to the objection raised by the office it is respectfully submitted that the such type of appeal has already been entertained by this honorable tribunal and in this effect separate application has been moved for entertaining the appeal without filing departmental appeal and order of rejection thereon. copy of the (Application is attached herewith).

So, the appeal may please be placed before the honorable bench for order.

  
Nasir Mahmood  
ASC. 22/10


The observation of this office and reply of Advocate is submitted for appropriate orders please.

Hon'ble  
The Chairman,

Be fixed for preliminary hearing along with with cited appeals before lead Bench for appropriate order in the rights of

22/10/14

express bar contained in  
section 4 of the NAFPA (KPA)  
Service Tribunal Act, 1979,  
after notice to the  
deemed ~~AGS~~

  
24/10/14

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

*Amended* APPEAL NO 1275 /2018/

ABIDA PARVEEN

VS

GOVT: OF KPK

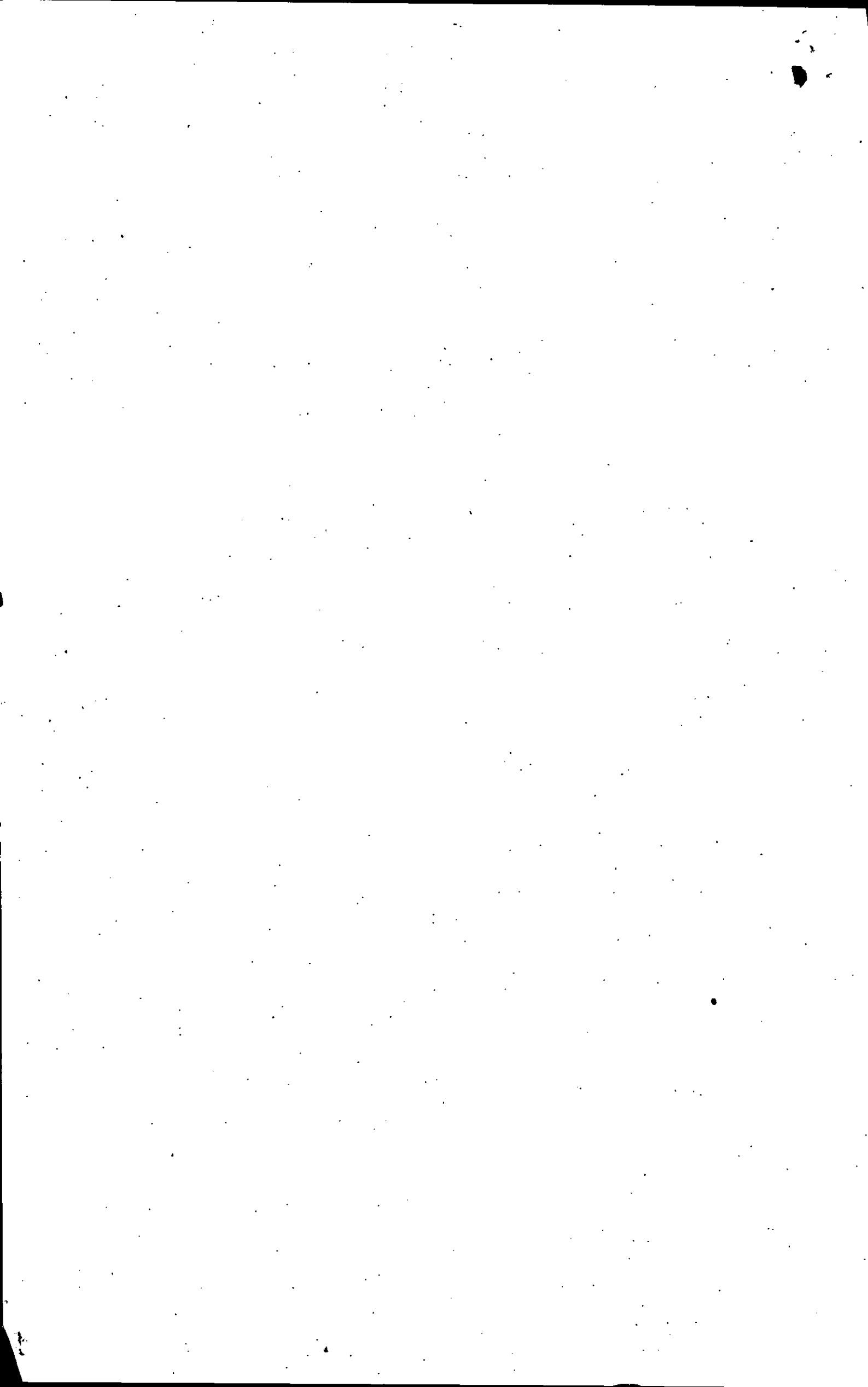
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**APPELLANT**

THROUGH:

  
**NOOR MOAHAMMAD KHATTAK**  
**ADVOCATE**



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

*Amended* APPEAL NO. 1275 /2015

Mst: Abida Parveen, SDEO Management Cadre (F) (BPS-17),  
Takht Bhai, District Mardan under Transfer to SDEO (F),  
Batkheela, District Malakand ..... **Appellant**

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

..... **Respondents**

**APPEAL UNDER SECTION- 4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974**  
**AGAINST THE IMPUGNED ORDER DATED 17.10.2014**  
**WHEREBY THE APPELLANT WAS TRANSFERRED AS**  
**SDEO (F) BATKHELA MALAKAND FROM THE POST OF**  
**SDEO (F) TAKHT BHAI MARDAN PRE MATURELY AND**  
**DUE TO POLITICAL INTERFERENCE AND AGAINST NOT**  
**TAKING ACTION ON THE DEPARTMENTAL APPEAL OF**  
**APPELLANT WITHIN THE STATUTORY PERIOD OF**  
**NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 17.10.2014 may very kindly be set aside and the respondents may be directed that not to transfer the appellant from the post of SDEO (F) Takht Bhai Mardan till completion of her normal tenure. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That vide Notification dated 21.2.2012 the appellant was appointed as Deputy District Officer Management Cadre (BPS-17) in the respondent Department after all codal formalities and on the proper recommendations of the Khyber Pakhtunkhwa Public Service Commission. Copy of the appointment order is attached as annexure ..... **A.**

- 2- That later on vide Notification dated 27.2.2012 a corrigendum was issued in the Notification dated 21.2.2012 by the respondent No.2 due to which the appellant was posted as Deputy District Officer (F) Management cadre (BPS-17) at Takht Bhai Mardan. That in response to the said Notification dated 27.2.2012 the appellant took over the charge of the said post and started performing her duty quite efficiently and up to the entire satisfaction of her superiors. Copy of the corrigendum is attached as annexure ..... **B.**
- 3- That appellant while working as SDEO (F) Takht Bhai it came into the notice of the appellant through news paper that mostly schools in Tehsil Takht Bhai are non functional due to non availability of the staff. That on the said issue the appellant took serious action and sent proposal to the concerned District Education Officer (F) Mardan. That on the said proposal the District Education Officer (F) Mardan issued a Notification due to which nine teachers have been transferred to the non functional schools. Copies of the press cutting, proposal and transfer order are attached as annexure ..... **C, D & E.**
- 4- That on the said transfers the local MPA Namely Mr. Jamshid Khan wrote a recommendation letter vide dated 25.3.2014 to the appellant for the cancellation of the said transfer order. That in response the appellant refused the same and fully informed the MPA concerned about the situation. Copy of the recommendations is attached as annexure ..... **F.**
- 5- That in consequence the local MPA got against the appellant and directed the respondent No.2 to transfer the appellant from Takht Bhai Mardan. That on the basis of that illegal and unethical direction the respondent No.2 transferred the appellant from the post SDEO (F) Takht Bhai to the post of SDEO (F) Batkhela Malakand pre maturely vide Notification dated 17.10.2014. That it is also very pertinent to mention that the appellant is an unmarried woman and her parents is reside at District Mardan. Copies of the MPA recommendations and impugned order are attached as annexure ..... **G and H.**
- 6- That appellant feeling aggrieved and having no other remedy filed Departmental appeal on 30.10.2014 but no heed was paid to the request of the appellant by the respondent No.1 within the statutory period. Hence the present appeal inter alia on the following grounds. Copy of the Departmental appeal is attached as annexure ..... **I.**

**GROUND:**

- A- That the impugned order dated 17.10.2014 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned order dated 17.10.2014 is against the Clause I, II, IV and X of the transfer/posting policy of the Government of Khyber Pakhtunkhwa. Copy of the policy is attached as annexure ..... J.
- D- That the appellant has been transferred by the respondent No.3 pre-maturely, therefore the impugned order dated 17.10.2014 is not tenable in the eye of law and prevailing rules.
- E- That the impugned order dated 17.10.2014 has not been issued by the respondents in the public interest nor exigencies of service.
- F- That the respondent Department acted in arbitrary and malafide manner while issuing the impugned order dated 17.10.2014.
- G- That the impugned order dated 17.10.2014 is politically motivated hence not tenable and liable to be set aside.
- H- That appellant is female unmarried virgin who reside with her parents at Mardan, therefore in light of clause X of the transfer/posting policy the impugned order dated 17.10.2014 is not tenable and liable to be set aside.
- I- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

**APPELLANT**



**ABIDA PARVEEN**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK**

**ADVOCATE**



**BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO \_\_\_\_\_ /2015

ABIDA PARVEEN

VS

GOVT: OF KPK

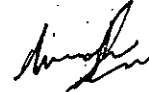
**APPLICATION FOR SUSPENSION OF OPERATION**  
**OF IMPUGNED ORDER DATED 17-10-2014 TILL**  
**THE DISPOSAL OF THIS APPEAL**

**R/SHEWETH:**

- 1- That the appellant filed above mentioned appeal along with this application before this august service Tribunal in which no date has been fixed so far.
- 2- That all the three ingredients necessary for the stay is in favor of the appellant.
- 3- That the transfer of the appellant is against the transfer policy of the Government of Khyber Pakhtunkhwa and the impugned transfer order dated 17-10-2014 is also not issued in the public interest nor exigencies of public service.
- 4- That the grounds of main appeal is also be considered as integral part of this application.

It is therefore humbly prayed that on acceptance of this application the order dated 17-10-2014 may very kindly be suspended till disposal of this appeal.

APPELLANT



ABIDA PARVEEN

THROUGH:



NOOR MOHAMMAD KHATTAK  
ADVOCATE

(4)

Annexure "A" - 6

Registered



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the, February 21, 2012.

NOTIFICATION.

NO.SO(S)3-2/2012/DDO(Female). Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following as Deputy District Officers Management Cadre in BS-17 (Rs.16000-1200-40000) plus usual allowances as admissible under the rules in the on regular basis under the existing policy of the Provincial Government with immediate effect:-

S.#	Name/Father's Name & Address
1.	Ms. Hasrat Zahra D/O Syed Israr Hussain, House No. 192, Street No.3, Sector-4 KDA Kohat.
2.	Ms. Mehr-un-Nisa D/O Usmanullah, Mohallah Ghafoor Khan, Village Hakim Abad, Nowshera.
3.	Ms. Ghazala Anjum D/O Taj Muhammad C/O Miraj-ud-Din Mountain Inn, Chitral.
4.	Ms. Nadia D/O Wasiullah, Mohallah Yaseen Khail, Chamkani.
5.	Ms. Shahida Parveen D/O Mir Badshah Khan, C/O Shoaib Sultan, near Millat Girls School Kirri Alizai, D.I.Khan.
6.	Ms. Aniq Huma Touqeer D/O
7.	Ms. Hussan Ara D/O Shams-ur-Rehman, C/O Dr. Fazl Jamal, Mohallah Poli Baba, Tehsil Barawal Bandi Dir Upper.
8.	Ms. Jamila Rana D/O Hafizullah Khan, C/O Tahirullah Arain, Street Allah Dad Faqir, Mohallah Shekhan Wala Sabir Bazar, District Tank.
9.	Ms. Zahida Bibi D/O Khalilullah, C/O Din Nawaz Khan Senior Officer Zari Taraqati Bank Bannu.
10.	Ms. Fanoos Jamal D/O Mehmood Khan, House No.357020 Mohallah, Kokab Colony opposite Siraj Complex, D.I.Khan.
11.	Ms. Ghulam Fatima D/O Muhammad Hassan Khan, C/O Deputy District Officer E&SE Parova D.I.Khan.
12.	Ms. Rukhsana Rahim D/O HajiRahim Khan, Mohallah Seeni Village & P.O Lund Khawar Mardan.
13.	Ms. Jamila Munawar D/O Gui Munawar, Govt. Girls High School, PAF Shaheen Camp Peshawar.
14.	Ms. Shaheen Begum D/O Wali Muhammad, C/O Kashif Medicose Baiambat Bazaar, Timergara Dir Lower.
15.	Ms. Rehana Yasmeen D/O Roshan Din, Mohallah Ahmad Khan, Village & P.O Box Sarai Saleh, Haripur.
16.	Ms. Nighat Bibi D/O Muhammad Khan, Indus Medicose, Al-Mumtaz Plaza, near Qureshi Petrol Pump supply Mansehra Road, Abbottabad.
17.	Ms. Shazia Nawaz D/O Rab Nawaz, C/O Shoaib Karyana Store, near Islami Madrassa Mosque Mohallah Kotab Colony, Tank City.
18.	Ms. Safia Amin D/O Amin-ul-Haq, Mohallah Hajian Torangzal Tehsil & District Charsadda
19.	Ms. Dure Shawar D/O Jasmhaid Khan, House No.24, Street No.7 Rahat Abad Palosi Road, Peshawar.
20.	Ms. Aisha Saeed D/O Saeed Ahmed Awan, Al-Saeed Saba Colony Nowan Sher Abbottabad.

**ATTESTED**

*[Handwritten signature]*

(7)

21.	Ms. Sadia Aziz D/O Aziz-ur-Rehman, House No.KL-1106 Mohallah Kassim Kohla Kohat Abbottabad.
22.	Ms. Hafsa Gul D/O Nushad Ali Khan, House No.1 Street 9, RahatAbad, Palosi Road, Peshawar.
23.	Ms. Sumera Sheraz D/O Sardar Khan, House No.84/228 Street No.17-B Gulbahar No.2 Peshawar.
24.	Ms. Abida Parveen D/O Lal Bahadar Mohallah Kumber Village & P.O Toru District Mardan.
25.	Ms. Laila Ali D/O Syed Ali Jan, Village & P.O Tangi Nusrat Zai, Tehsil Tangi, District Charsadda.
26.	Ms. Naila Arif D/O Dr. Abdul Latif C/O Sadullah Khan, Ex- Govt. Contractor, House No. C/3125, Mohallah Laghari, near Masjid papal Wali, D.I.Khan.
27.	Ms.Nargis Jabeen D/O Saifullah, House No.290/D Aria Samaj Tanchi Bazar Bannu

2- On their appointment, they are posted in E&SE offices in different Districts of Khyber Pakhtunkhwa as noted against each subject to the conditions given below:-

S.#	Name/Father's Name & Address	Proposed place of posting	Remarks
1	Ms. Hasrat Zahra D/O Syed Israr Hussain, House No. 192, Street No.3, Sector-4 KDA Kohat.	Deputy District Officer (Female) (BS-17) E&SE Kohat	Vice S.No.28
2	Ms. Mehr-un-Nisa D/O Usmanullah, Mohallah Ghafoor Khan, Village Hakim Abad, Nowshera.	Deputy District Officer (Female) (BS-17) E&SE Chitral	Vice S.No.29
3	Ms. Ghazala Anjum D/O Taj Muhammad C/O Miraj-ud-Din Mountain Inn, Chitral.	Deputy District Officer (Female) (BS-17) E&SE Mastooj at Booni Chitral	Vice S.No.30
4	Ms. Nadia D/O Wasiullah, Mohallah Yaseen Khail, Chamkani.	Deputy District Officer (Female) (BS-17) E&SE Lahor Swabi.	A.V.P
5	Ms. Shahida Parveen D/O Mir Badshah Khan, C/O Shoaib Sultan, near Millat Girls School Kirri Alizai, D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE D.I.Khan	Vice S.No.32
6	Ms. Aniq Huma Touqeer D/O Sher Ahmad Akhtar Khattak, C/O Qaisar Tanveer Khattak, Tariq Abad, D.I.Khan	Deputy District Officer (Female) (BS-17) E&SE Kulachi D.I.Khan	Vice S.No.31
7	Ms. Hussan Ara D/O Shams-ur-Rehman, C/O Dr. Fazi Jamal, Mohallah Poli Baba, Tehsil Barawal Bandi Dir Upper.	Deputy District Officer (Female) (BS-17) E&SE Dir Upper	Vice S.No.33
8	Ms. Jamila Rana D/O Hafizullah Khan, C/O Tahirullah Arain, Street Allah Dad Faqir, Mohallah Shekhan Wala Sabir Bazar, District Tank.	Deputy District Officer (Female) (BS-17) E&SE, Tank.	A.V.P
9	Ms. Zahida Bibi D/O Khalilullah, C/O Din Nawaz Khan Senior Officer Zari Taraqiati Bank Bannu.	Deputy District Officer (Female) (BS-17) E&SE, Hangu.	-do-
10	Ms. Fanoos Jamal D/O Mehmood Khan, House No.357020 Mohallah, Kokab Colony opposite Siraj Complex, D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE, Takht-e-Nusrati Karak.	-do-
11	Ms. Ghulam Fatima D/O Muhammad Hassan Khan, C/O Deputy District Officer E&SE Parova D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE, Parova D.I.Khan.	Vice S.No.34
12	Ms. Rukhsana Rahim D/O HajiRahim Khan, Mohallah Seeni Village & P.O Lund Khawar Mardan.	Deputy District Officer (Female) (BS-17) E&SE, Sama Ranazai Malakand	A.V.P

7

13	Ms. Jamila Munawar D/O Gul Munawar, Govt. Girls High School, PAF Shaheen Camp Peshawar.	Deputy District Officer (Female) (BS-17) E&SE, Banda Daud Shah Karak	Vice S.No.35
14	Ms. Shaheen Begum D/O Wali Muhammad, C/O Kashif Medicose Balambat Bazzar, Timergara Dir Lower.	Deputy District Officer (Female) (BS-17) E&SE, Timergara Dir Lower	A.V.P
15	Ms. Rehana Yasmeen D/O Roshan Din, Mohallah Ahmad Khan, Village & P.O Box Sarai Saleh, Haripur.	Deputy District Officer (Female) (BS-17) E&SE, Haripur.	-do-
16	Ms. Nighat Bibi D/O Muhammad Khan, Indus Medicose, Al-Mumtaz Plaza, near Qureshi Petrol Pump supply Mansehra Road, Abbottabad.	Deputy District Officer (Female) (BS-17) E&SE, Mansehra.	A.V.P
17	Ms. Shazia Nawaz D/O Rab Nawaz, C/O Shoaib Karyana Store, near Islami Madrassa Mosque Mohallah Kotab Colony, Tank City.	Deputy District Officer (Female) (BS-17) E&SE, Lakki Marwat	-do-
18	Ms. Safia Amin D/O Amin-ul-Haq, Mohallah Hajian Torangzai Tehsil & District Charsadda	Deputy District Officer (Female) (BS-17) E&SE, Charsadda	Vice S.No.36
19	Ms. Dure Shawar D/O Jasmhaid Khan; House No.24, Street No.7 Rahat Abad Palosi Road, Peshawar.	Deputy District Officer (Female) (BS-17) E&SE, Peshawar.	A.V.P
20	Ms. Aisha Saeed D/O Saeed Ahmed Awan, Al-Saeed Saba Colony Nawar Sher Abbottabad.	Deputy District Officer (Female) (BS-17) E&SE, Battagram.	Vice S.No.37
21	Ms. Sadia Aziz D/O Aziz-ur-Rehman, House No.KL-1108 Mohallah Kassim Kohla Kohal Abbottabad.	Deputy District Officer (Female) (BS-17) E&SE, Abbottabad	A.V.P
22	Ms. Hafsa Gui D/O Nushad Ali Khan, House No.1 Street 9, RahatAbad, Palosi Road, Peshawar.	Deputy District Officer (Female) (BS-17) E&SE, Nowshera.	Vice S.No.38.
23	Ms. Sumera Sheraz D/O Sardar Khan, House No.84/228 Street No.17-B Gulbahar No.2 Peshawar.	Deputy District Officer (Female) (BS-17) E&SE, Swabi.	A.V.P
24	Ms. Abida Parveen D/O Lal Bahadar Mohallah Kumber Village & P.O Toru District Mardan.	Deputy District Officer (Female) (BS-17) E&SE, Mardan	Vice S.No.41
25	Ms. Laila Ali D/O Syed Ali Jan, Village & P.O Tangi Nusrat Zai, Tehsil Tangi, District Charsadda.	Deputy District Officer (Female) (BS-17) E&SE, Tangi Charsadda.	Vice S.No.39
26	Ms. Naila Latif D/O Dr. Abdul Latif C/O Sadullah Khan, Ex- Govt. Contractor, House No. C/3125, Mohallah, Laghari, near Masjid papal Wali, D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE, Paharpur D.I.Khan	Vice S.No.40
27	Ms. Nargis Jabeen D/O Saifullah, House No.290/D Aria Samaj Tanchi Bazar Bannu.	Deputy District Officer (Female) (BS-17) E&SE, Bannu.	A.V.P
<b>CONSEQUENTIAL POSTINGS/TRANSFERS</b>			
28.	Ms. Hurnera Syed, Deputy District Officer Female (BS-17) Chitral	Subject Specialist Mathematics, GGHSS Shakardara Kohat.	A.V.P
29.	Ms. Zahra Jalal, Deputy District Officer Female (BS-17) Chitral.	Incharge District Officer (Female) Chitral till further orders and subject to the condition that she will not claim, seniority pay and allowances of the higher post.	she already holds as additional charge

**ATTESTED**

*[Signature]*

30.	Ms. Bibi Halima, Deputy District Officer Female (BS-17) Mastooj Chitral.	Subject Specialist Isimiyat (BS-17) GGHS Samarbagh Dir Lower.	A.V.P
31.	Ms. Akhtar Batool, Deputy District Officer Female (BS-17) Kulachi D.I.Khan.	Headmistress (BS-17) GGHS Musazai D.I.Khan	A.V.P
32.	Ms. Shahana Yasmeen, Deputy District Officer Female (BS-17) D.I.Khan.	Headmistress (BS-17) GGHS Kirri Shamoza D.I.Khan	-do-
33.	Ms. Habib-un-Nisa, (SET BS-16) Deputy District Officer Female (BS-17) Dir Upper.	SET (BS-16) GGHS Gandigar Dir Upper.	A.V.P
34.	Ms. Kulsoom Begum, Deputy District Officer Female (BS-17) Parova D.I.Khan.	Headmistress (BS-17) GGHS Dalukhel Lakki Marwat.	-do-
35.	Ms. Javed Iqbal, Deputy District Officer Female (BS-17) Banda Daud Shah Karak.	Headmistress (BS-17) GGHS Khurram Karak.	-do-
36.	Ms. Aqila Begum, Deputy District Officer Female (BS-17) Charsadda.	Headmistress (BS-17) GGHS Daulat Pura Charsadda.	-do-
37.	Ms. Rahida Begum, Deputy District Officer Female (BS-17) Mansehra.	Headmistress (BS-17) GGHS Talhata Mansehra.	-do-
38.	Ms. Bibi Raheela, Deputy District Officer Female (BS-17) Nowshera.	Headmistress (BS-17) GGHS Nizampur Nowshera.	-do-
39.	Ms. Sameena Roohi, Deputy District Officer Female (BS-17) Tangi Charsadda.	Headmistress (BS-17) GGHS Alijan Killay Charsadda.	-do-
40.	Ms. Kausar Parveen, Deputy District Officer Female (BS-17) Paharpur D.I.Khan.	SET (BS-16) services placed at the disposal of Directorate E&SE Peshawar.	-do-
41.	Ms. Saeeda Nishat Akhtar, Deputy District Officer Female (BS-17) Mardan.	Headmistress (BS-17) GGHS Kohi Barmol Mardan.	-do-

TERMS & CONDITIONS:

1. Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 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 Deputy District Officer who are already in Government service and working against pensionable posts on regular basis before 1<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances, shall be forfeited to the Government.

8

(8)

4. The appointees should join their posts within 30 days of the issuance of this notification. The Director, E&SE Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise, after one month of the issuance of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
5. They would be on probation for a period of one year extendable for another one year.
6. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period.
8. Charge report should be submitted to all concerned.
9. No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

ENDST. NO. & DATE EEVEN.

Copy forwarded for information & necessary action to:-

- 1- Accountant General, Khyber Pakhtunkhwa.
- 2- Director, E&SE, Peshawar.
- 3- All EDOs, E&SE in Khyber Pakhtunkhwa.
- 4- District Accounts Officers Concerned.
- 5- Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 6- PS to Chief Secretary, Khyber Pakhtunkhwa.
- 7- PS to Secretary, E&SE Department
- 8- Candidate Concerned.
- 9- Office order file.



(AMIR HASSAN KHAN)  
SECTION OFFICER (S/F)

**ATTESTED**





Annexure "B" - 9

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SE DEPARTMENT

Dated Peshawar the, February 27, 2012.

Corrigendum

NO.SO(S/F)E&SE/3-2/2012/DDO(Female): In partial modification of this Department's Notification of even No dated 21-2-2012, the place of posting of officers at S.No.24 and 41 may be read as under:-


S.No.	Name	Place of posting
1.	Ms. Abida Parveen, D/O Lal Bahadar, Mohallah Kumbhar Village & P.O Toru District Mardan.	Deputy District Officer Female (BS-17) E&SE Takhtbhai.
2.	Ms. Saeeda Nishat Akhtar (Headmistress BS-17).	Deputy District Officer Female (BS-17) E&SE Mardan.

SECRETARY

Ends of even No & date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. Executive District Officer, E&SE Mardan.
4. District Accounts Officer Mardan.
5. Incharge EMISE, E&SE Department.
6. P.S to Secretary E&SE Department.
7. Officer concerned.
8. Office order file.

  
(Amir Hassan Khan)  
SECTION OFFICER (S/F)

**ATTESTED**



DAILY EXPRESS

# ایکسپریس

پاکستان کے 11 مسسٹرون سے بہت زیادہ شہرت اور ادا شدہ اجرت

C-10

## حکومت کی گزراہی پرائمری سکولوں میں ایک سو تیس سالہ لڑکیوں کا انکسٹریٹ

پشاور میں ایک سو تیس سالہ لڑکیوں کو گزراہی پرائمری سکولوں میں داخلہ دینے کے لیے حکومت نے ایک سو تیس سالہ لڑکیوں کے گزراہی پرائمری سکولوں میں داخلہ دینے کا فیصلہ کیا ہے۔

حکومت نے ایک سو تیس سالہ لڑکیوں کو گزراہی پرائمری سکولوں میں داخلہ دینے کے لیے ایک سو تیس سالہ لڑکیوں کے گزراہی پرائمری سکولوں میں داخلہ دینے کا فیصلہ کیا ہے۔

حکومت نے ایک سو تیس سالہ لڑکیوں کو گزراہی پرائمری سکولوں میں داخلہ دینے کے لیے ایک سو تیس سالہ لڑکیوں کے گزراہی پرائمری سکولوں میں داخلہ دینے کا فیصلہ کیا ہے۔

ATTESTED

ایک سو تیس سالہ لڑکیوں کو گزراہی پرائمری سکولوں میں داخلہ دینے کے لیے ایک سو تیس سالہ لڑکیوں کے گزراہی پرائمری سکولوں میں داخلہ دینے کا فیصلہ کیا ہے۔



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER FEMALE TAKHT BHAI.

D - (11)

The meeting of all ASDEOs of tehsil Takht Bhai was held on 15/1/2014 in the office of the SDEO female Takht Bhai chaired by SDEO female Takht Bhai.

The meeting was started with the recitation of the holy Quran and then the following matters were discussed with their effect/ consequences.

1; Un proposed teachers transfer from Tehsil Mardan;

The field officers discussed the above matters with the undersigned that most teachers have been transferred from Tehsil Mardan with out any prior information/proposal/ vacancy conformation from the ASDEOS circle concerned or Sub Divisional Education Officer female. Which destabilized the working position of teachers in many schools badly created awkward situation in the account point of view.

2; Transfer of teachers in inter Tehsil Schools.

It was discussed that much more transfer of teachers have been made among this Tehsil schools with out any proposal/ information/ vacancy confirmation of ASDEOs circle concerned. Due to which the teachers working position vide sanction posts in the schools have been badly irrationalized on the one hand, and on the other hand many schools were left on their responsibility of single teachers and with GGPS Srey koty, Suhbat Seri, Ahmad Abad and Said Mir Kally in closing position.

3; wrong names of schools in transfer orders.

The teachers have been transferred to/ from GGPS Khadi Kally, Subaidar Kally, Sur Pul, Jamshid Khan Kally, Haji Gulab Koty which created confusion. Whether to consider them on strength of this tehsil or any where else.

4; Every day changing position of teachers strength in schools.

It came to the notice of all that the teachers are under transfer to the schools with out any stay confirmation e.g Mst; Nargis was transferred from GGPS Ikram Pur T.Bhai with out any vacancy confirmation in one order, while in other order after few days the same teachers has been transferred to GGPS Lala Jan Kally Takht Bhai showing on the strength of GGPS Ikram Pur (with out any vacancy), same is the case of Mst Maryam PST of this Tehsil.

5; HPSTs refusal Decision pending.

Those teachers who have refused from the post of HPSTs in due time. There refusal acceptance or rejection is still pending, due to which this office is facing difficulties in their pay fixation and adjustments matters.

**ATTESTED**



6; Schools where HPSTs needed.

12

In the schools of this Tehsils where HPSTs are needed are as follows.


- |                               |                          |
|-------------------------------|--------------------------|
| 1; GGPS Said Mir Kally.       | 10; GGPS Noor Abad       |
| 2; GGPS Sher Hassan Kally.11; | GGPS Chanchano Khat.     |
| 3; GGPS Qamar Abad.           | 12; GGPS Srey Koty.      |
| 4; GGPS Kaudari.              | 13; GGPS Suhbat Seri.    |
| 5; GGPS Pirsaddi.             | 14; GGPS Dandaw.         |
| 6; GGPS Lal Bacha Korona. 15; | GGPS Ahmad Abad Qandaro. |
| 7; GGPS Shah Baig.            | 16; GGPS Mir Karam Banda |
| 8; GGPS Safdar Killi          | 17; GGPS Buhero          |
| 9; GGPS Mughal Killi          |                          |

While the position of Arabi Banda & Miskeen Abad (Takht Bhai) is not clear due to the HPSTs appeal decision pending.

CONCLUSION.

In the light of above facts the District Education Officer female Mardan is requested to guide this office in the above mentioned matters, as if these remained unsolved, will create serious problems not only for the establishment section, but also on the account section.

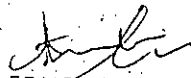
So before occurring any financial weaknesses, your good office is requested for guidance and further prompt action please.

  
SUB DIVISIONAL EDUCATION OFFICER  
FEMALE TAKHT BHAI.

Endst; No 17/8 dated; 25/01/2014. 24/1/2014

Copy forwarded for information to the:-

- 1: Secretary Education, Govt; of Khybar Pakhtoon Khwa, Peshawar.
- 2: Directorate of E & S, Education, Peshawar.
- 3: District Education Officer Female Mardan.
- 4: All ASDEOs Tehsil Takht Bhai.

  
SUB DIVISIONAL EDUCATION OFFICER  
FEMALE TAKHT BHAI.

**ATTESTED**



E-13

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

OFFICE ORDER

As proposed by the SDEO (F) Takht Bhai vide her No 1769 dated 15/2/2014, The following PSTs are hereby transferred to the schools noted against each on administrative ground on their own pay and LPS, with immediate effect in the interest of public service.

S.No	Name of teacher / School	Adjusted At	Remarks
1	Hamida	GGPS Takar	GGPS Zairullah Banda Adm:Ground
2	Nihayat	GGPS, Takkar	GGPS, Suhbat, Serai -do-
3	Husan Taraj	GGPS, Takkar	GGPS, Suhbat, Serai -do-
4	Robina Rehmat	GGPS, No 1 Takht Bhai	GGPS, Said Mir, Killi -do-
5	Fiina Naik Amal	GGPS, No 1 Takht Bhai	GGPS, Said Mir, Killi -do-
6	Zeenat	GGPS, Takkar	GGPS, Muhammad Din Kili -do-
7	Roman Begum	GGPS, Moh: Din Killi	GGPS, Takkar -do-
8	Dilpasanda	GGPS, Shah Zaman Qila	GGPS, Muhammad Shah Kili -do-
9	Farida Gul	GGPS, Muhd: Shah Kili	GGPS, Sher Garh No 2 -do-

Note: NO TA/DA is allowed  
Charge report should be submitted and concerned.

(ZUHRA KHUNZADA)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

*The DEO F...  
Please convey this  
order to shops*

Endst: NO 903-G / Dated: 20/2/14

Copy forwarded to the;

1. Sub Divisional Education Officer (F) Takht Bhai
2. Head teacher concerned
3. Teacher Concerned.

DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

JAMSHID KHAN  
Chairman  
Standing Committee E&T KPS  
PK-27 Mardan.

ATTESTED

(22)

F-14 شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند

ممبر صوبائی اسمبلی خیبر پختونخوا

Ref# \_\_\_\_\_

Respected SDEO (F) (SB)

Date: 25-3-2014

Takht Bhai

ATM

Hope you will be fine  
Killy, Cancell the Transfer order  
of the 9 members of teaching staff  
in light of the inquiry report  
of the inquiry committee. this  
is most important since they belong  
to my constituency. Best wishes  
and profound prayers.

Residence:  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Dist: Mardan

Almir

25/3/14

JAMSHID KHAN MOHMAND  
MPA - PK-22  
Standing Committee  
Khyber Pakhtunkhwa

Cell: 0300-9323355-0345-9255633  
Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

ATTESTED

6.

محکمہ تعلیمات، ضلع ماردان، خیبر پختونخوا

عنون :- ایڈجسٹمنٹ آف آئی آر، سرزادہ عزیز خان  
گورنمنٹ گزٹڈ پرائمری سکول، تحصیل آباد ماردان

جناب عالیہ!

مؤدیہ گزارش ہے کہ آئی آر سرزادہ عزیز خان مورخہ 2003ء 17-04 سے تاحال  
گورنمنٹ گزٹڈ پرائمری سکول، شاہ پور کے ایڈجسٹمنٹ آف آئی آر کے نام سے کام لے رہے ہیں۔  
ایڈجسٹمنٹ آف آئی آر کے مطابق اپنے سکول میں بحیثیت جوئیئر جانے کا حق رکھتی ہے۔  
لہذا التماس کی جاتی ہے کہ محلہ کو گورنمنٹ گزٹڈ پرائمری سکول، تحصیل آباد ماردان میں  
آئی آر ویکٹ پیوسٹ دیا جائے۔

العارضہ!

اس کی تالیف فرمان آئی آر، سرزادہ عزیز خان ولد عزیز خان، گورنمنٹ گزٹڈ پرائمری سکول

Handwritten signature  
Head Misress  
G. G. 3  
Fazal Abadi

شاہ پور کے ایڈجسٹمنٹ آف آئی آر

Handwritten signatures and stamps:  
- MPA Pheroze  
- MPA Pheroze  
- MPA Pheroze  
- MPA Pheroze

Attestation stamp:  
Jirukhar Ali Mashwani  
MPA PK-26  
Chairman, Dist. Dev.  
Advisory Committee Mardan

ATTESTED

Handwritten signature

16

To,  
The D.E.O (Female) Primary,  
Mardan.

Subject: APPLICATION FOR TRANSFER FROM G.G.P.S.  
Abdur Rahman Killi To G.G.P.S Takkar.

Respected Sir,

With due respect I beg to say that I am serving my duty as Primary School Teacher in G.G.P.S Abdur Rahman Killi from since 18 years. I am residence of Takkar, and my duty station is so far from my village home town.

Sir,  
My transfer order issue on 27-05-2013 to G.G.P.S Takkar, But the ordered is canceled after a few days. According to 1967/4. Therefore requested to you that you are issue my transfer order from G.G.P.S Abdur Rahman Killi to G.G.P.S Takkar. I am very thank full for your this kind of act.

*DEOCFS Mardan  
They be  
want  
line*

*of accounts to  
class by NME*

Yours Truly  
*[Signature]*  
Gulzar Begum  
BPS-12  
G.G.P.S Abdur Rahman Killi

P.A. To Minister for Elementary  
& Secondary Education  
Khyber Pakhtunkhwa

ATTESTED

*[Signature]*

(12-A)

شہید ایم بی اے عمران خان ہمند شہید ملت - ایک ناقابل فراموش کردار

17

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان ہمند

میر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

The S.O.P.O (F) (Sh)

Date: 15/10/14

Takht Bhai.

AMM Hope you will be fine

Mrs: Ghazala Shamen, Zehra Begum  
and Farzana wants to take loan  
against the salary. This is a legal  
practice as per Govt. policy, therefore  
do the needful accordingly.  
Best wishes and profound prayers.

Residence  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Dist: Mardan.

Regards

Jamshid Khan  
Chairman  
Standing Committee ESTKPK  
PK-27 Mardan

Cell: 0300-9323355-0345-9255633  
Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

ATTESTED

(12-B)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

18

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Respectable Director (F) Sir,  
Mardan.

Date: 23/3/14

ATB1  
Hope you will be fine.  
Kindly, issue transfer order of  
Mrs. Lubana Laila (PST) from G.G.P.S.  
Fazl-e-Lubman Bazar (Pakhal) to  
G.G.P.S. Zorakhal (Pakhal) (Pakhal)  
against the vacant post. I shall  
be very much thankful to you.

Residence  
Faram Korona  
(Shamilat) Jalala  
Tehsil: Takhtbhai  
Distt: Mardan

Regards

JAMSHID KHAN MOHAMMAD  
MPA - PK-21  
Chairman Standing Committee I & II  
Khyber Pakhtunkhwa

Cell: 0300-9323355-0345-9255633  
Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

ATTESTED



(12-c)

19

شہید ایم پی اے عمران خان ہمنند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان ہمنند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Respected SDO  
Takat Bhai

Date: 11-1-14

ATTN: Hope you will be fine.  
Kindly, sort out the problem  
of the letter bearer. I shall  
be very much thankful to you.

Residence:  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt: Mardan.

Regards

Jamshid Khan Mohmand

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa

Cell: 0300-9323355-0345-9255633  
Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

ATTESTED

شہید ایم پی اے عمران خان مہمند شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Date: 28/2/15

Respected SDEO  
on behalf of

AM Hope you will be kind  
to kindly open the salary  
of Mrs. Abida Begum Pst,  
since she is my relative.  
I shall be very much  
thankful to you

Regards

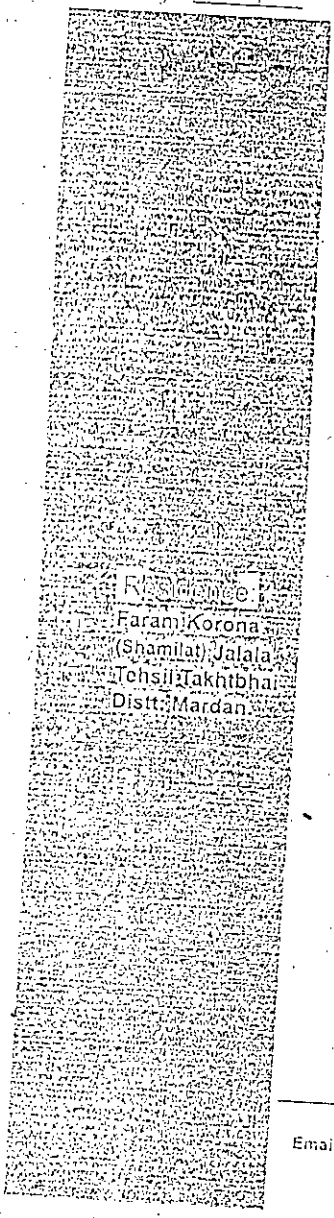
*Jamshid Khan*  
28/2/15

JAMSHID KHAN  
Chairman  
Standing Committee E&T KPK  
PK-27 Mardan

Cell: 0300-9323355-0345-9255633  
Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

ATTESTED

*[Signature]*



(14)

(21)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Respected Director, Date: 9/2/2014  
Mardan

AM/ Hope you will be true.

Kindly, appoint Mr. Faisal Khan  
S/o. Gulandaz G/o. Tekadar Kille  
against the vacant post of Class 4  
(Chonkidas) in G.S.P. Tekadar Kille.  
I shall be very much thankful  
to you

Residence:  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt Mardan

Respect,

Jamshid Khan Mohmand

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa

Cell: 0300-9323355-0345-9255633  
Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

ATTESTED

1

Annexure "A" (12)  
شہید ایم پی اے عمران خان مہمند شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref# \_\_\_\_\_

The SDBo (F) EOM  
take the Bhu -

Date: 30/4/14

As per  
kindly, do the needful  
accordingly, since the  
applicant is already  
recommended by the  
concerned MP. Best  
wishes and perfect  
progress.

Residence:-  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt: Mardan

Regards

Jamshid Khan  
JAMSHID KHAN  
Chairman  
Standing Committee E&T KPK  
PK-27 Mardan

Call: 0300-9323355-0345-9255633  
Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

ATTESTED

*[Signature]*



9-23

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No.SO(S/F)E&SE/4-17/2014/Abida Parveen SDEO (F) Takht Bhai, Mardan  
Dated Peshawar May 14, 2014.

To

The Director,  
Elementary & Secondary Education,  
Peshawar.

SUBJECT:- MEETING OF STANDING COMMITTEE NO.26 ON EDUCATION DEPARTMENT.

I am directed to refer to the subject noted above and to state that during the meeting. Mr. Jamshaid Khan Mohmand MPA Khyber Pakhtunkhwa complained against Ms. Abida Parveen SDEO (F) Takht Bhai, Mardan. In his complaint, he has stated that her performance is unsatisfactory and her attitude towards public is not good as it is reported that she quite often uses abusive language.

I am therefore, directed to request you to kindly look into the matter and submit report to this department for perusal of high ups.

*[Handwritten Signature]*  
14/5/14  
SECTION OFFICER (S/F)

Endst.of even No & Date

Copy forwarded to:

1. PS to Secretary E&SE Department.
2. PS to Special Secretary E&SE Department.
3. PS to Deputy Secretary E&SE Department.

SECTION OFFICER (S/F)

DDI  
LP  
16/5

*[Handwritten notes and signatures]*  
ADD E  
Immediate DDE  
ATTACHED

to Director E & S E  
Peshawar  
Date 16/5  
4/5  
19/5  
*[Handwritten signatures]*



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

H-24

Dated Peshawar the, October 17, 2014.

NOTIFICATION

NO.SO(S/E)&SE/4-16/2014/DDEO & SDEO (F): The following posting / transfer of female officers are hereby ordered in the interest of public service with immediate effect:-

S.No	Name, Designation & place of posting	To	Remarks
1.	Ms. Neelofar Kanran Subject Specialist English (BS-18) GGHS No.2 Bannu under transfer as DDEO (F) Kohistan. (Teaching Cadre)	Subject Specialist English (BS-18) GGHS No.2 Bannu.	Notification of this department dated 28-04-2014 is hereby with drawn
2.	Ms. Abida Parveen SDEO (F) (BS-17) Takht Bhai, Mardan (Management Cadre)	SDEO (F) (BS-17) Batkhela, Malakand	Against Vacant Post
3.	Ms. Sayeda Nishat Akhtar SDEO (F) (BS-17) Mardan (Teaching Cadre)	SDEO (F) (BS-17) Dargai, Malakand	-do-
4.	Ms. Yasmin Aziz Subject Specialist (BS-17) DCTE Abbottabad (Teaching Cadre)	SDEO (F) (BS-17) Haripur	-do-

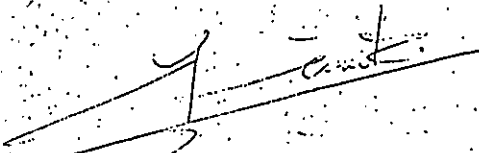
2. No TA/DA allowed.

SECRETARY

Endst. of even No & date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. Director DCTE Khyber Pakhtunkhwa, Abbottabad.
4. District Education Officer (F) concerned.
5. District Accounts Officer concerned.
6. Section Officer-I Chief Minister's Secretariat Khyber Pakhtunkhwa.
7. Incharge EMIS, E&SE Department.
8. PS to Minister E&SE Khyber Pakhtunkhwa.
9. PS to Secretary E&SE Department.
10. Officer concerned.
11. Office order file.

  
(FOZIA NAZ)  
SECTION OFFICER (S/F)

ATTESTED



To,

The Chief Secretary,  
Khyber Pakhtoon Khwa,  
Civil secretariat Peshawar.

Received  
30/10/14

I-25

Subject:-

APPEAL FOR CANCELLATION OF TRANSFER ORDER.

R/Sir,

With due respect I beg to appeal for cancellation of un-genuine transfer order which has issued by Elementary and secy: Education Department vide Notification No, (SO (S/F) E & SE/ 4-16/2014/DDEO & SDEO(F) dated 17/10/2014 (Copy Attached).

My grievances upon the transfer order are as under:-

Particullers:-

- 1:- Name .
- 2:- Designation/ BPS
- 3:- Cadre.
4. Tenure on the Post/ Station.
5. Service Station:

Miss Abida Parveen.  
S.D.E.O (F) BPS-17.  
Management Cader.  
01/03/2012 to date.  
SDEO(F) Office Takht Bhai.

Grievances.

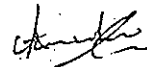
- 1:- I have not completed my tenure (3 Years) on the present post / station.
- 2:- Only a single SDEO(F) management cadre has disturbed in the order, although there is a 28 SDEOs(Management cadre) in all over the K.P.K & they all are working still on their Posts/stations.
- 3:- I belong to District Mardan , & being a vacant SDEO (F) Post in Tehsil Mardan, I has Posted in Malakand zone Batkhela in the above mentioned transfer order, which is against the transfer policy especially for Female Un Married the transferred order badly-crushed the transfer policy.
- 4:- In the whole service period there are no allegations / inquiries etc: are pending against me, so there is no cause for said transfer mentioned above.

In view of the above mentioned facts it is requested to your good office for sympatric action and order for partially cancelation may be issued please.

Dated 26/10 /2014.

Yours Obediently,

g/c



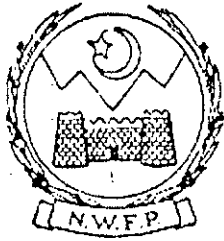
Miss Abida Parveen

Sub Divisional Education Officer,(F)  
Tehsil Takht Bhai District Mardan.

**ATTESTED**



J-26



**GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(Regulation Wing)**

**POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.**

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
  - ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
  - iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
  - iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
  - v) <sup>1</sup>{ }
  - vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
- <sup>2</sup>While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
  - vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
  - viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
  - ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
  - x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules.

Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

ATTESTE  
[Signature]



xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement  
**DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;**

xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

**ATTESTED**

28

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule – IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

.....

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003}.

.....

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

ATTESTED

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO...1275.....\2014

Ms.Abida Parveen SDEO (F) BPS-17 E&SE, Takht Bhai, Mardan.....Appellant

Versus

Secretary Govt. of KPK, E&SE, Department Civil Secretariat,  
Peshawar.....Respondents

Application for entertaining the instant appeal with filing departmental in the light of orders passed on the Appeal no.1246\2014 and 1247\2014.


Respectfully Sheweth:

1. That the captioned appeal is being filed before this Honorable Tribunal in which no date of hearing has yet been fixed.
2. That this honorable tribunal in the light of judgment reported as PLJ 2014 Tr.C Page 41 has already entertained two appeal bearing no.1246\2104 and 1247\2014 titled ""Abdul Aziz VS C& W Department"" and ""Khadim Hussain VS C& W Department"" respectively without filing departmental appeal due to transfer matter.
3. That the instant appeal also arises out of the transfer order and thus having same law points, may kindly be entertained by this honorable tribunal.

It is therefore respectfully prayed that on accept of this appeal prayer sought in the heading of the application may be allowed in favor of the appellant.

  
Appellant

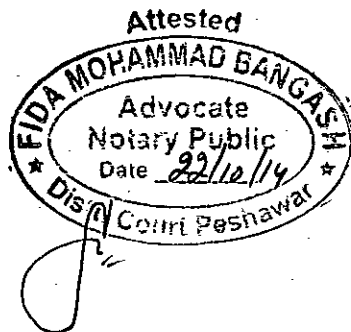
Through

  
Nasir Mahmood Advocate,  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.

**Affidavit**

I, do hereby declare, and affirm on oath that the contents of the application are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble tribunal.

  
Deponent



BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.....1275.....\2014

Ms.Abida Parveen SDEO (F) BPS-17 E&SE, Takht Bhai, Mardan.....Appellant

Versus

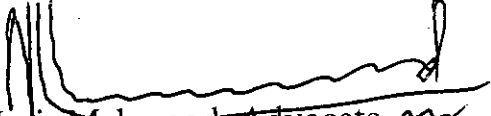
Secretary Govt. of KPK, E&SE, Department Civil Secretariat,  
Peshawar.....Respondents

INDEX

S.NO	Description of Documents	Annexure	Pages
1.	Grounds of Appeal with Affidavit		1-3
2.	Application with Affidavit		4-5
3.	Copy of the Notification dt.21.02.2012	A	6-10
4.	Copy of the Notification dt.27.02.2012	B	11
5.	Copies of the recommendations letter	C	12-20
6.	Copy of the transfer order and recommendation of the MPA	D	21-22
7.	Copy of the impugned transfer order	E	23
8.	Press Clippings		24-25
9.	Wakalat Nama		

  
Appellant

Through

  
Nasir Mahmood Advocate,  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.

(1)

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO. 1275/2014

12-83  
22-10-2014

Ms. Abida Parveen SDEO (F) BPS-17 E&SE, Takht Bhai, Mardan.....Appellant

Versus

Secretary Govt. of KPK, E&SE, Department Civil Secretariat,  
Peshawar.....Respondents

Service Appeal U/Section 4 of the KPK Service Tribunal Act, 1974 against the Notification dated 17-10-2014 passed by the respondent whereby appellant was transferred from the post of SDEO E&SE, Takht Bhai, Mardan, to Batkhela, Malakand hence the instant appeal.

Prayer in Appeal; To set-aside the Notification dated 17-10-2014 and appellant may kindly be allowed to remain posted as SDEO (F) E&SE, Takht Bhai, Mardan.

Respectfully Sheweth;

1. That the appellant as per recommendations of KPK Public Service Commission Peshawar was appointed as Deputy District Officer Management Cadre (Female) Mardan, vide Notification dated 21.02.2012. Later on however through Corrigendum dated 27.02.2012 the appellant was adjusted as DDO Female E&SE Takht Bhai, Mardan. (Copy of the Notifications is attached as annexure-A&B respectively).

2. That since then the appellant is performing her <sup>duty</sup> to the best of her ability and with dedication and perhaps earned good reputation in short span of time. She did her job with zeal and zest and left no stone unturned in discharge of her duties.

22/10/14

(2)

3. That the local MPA is constantly interfering in the transfer of teachers from one place to an others and the appellant being civil servant was trying to protect govt. interest by keeping the teachers community from politics. She always tried her best to remind the teachers of their duties. (Copies of the recommendations letters issued by the local MPA addressed to the appellant are attached herewith as annexure-C.)

4. That it came to the notice of the appellant through News Paper and also through Electronic Media that some of the Schools in Tehsil Takht Bhai are non functional due to non-availability of the staff therefore, on the proposal of the appellant DEO Female, Mardan transferred nine teachers from those schools who were surplus in the place of there posting but the local MPA again directed the appellant to cancel their transfer orders. (Copy of the transfer order and recommendations of the MPA is attached herewith as annexure-D).

5. That after passing of few months as a result of the above occurrence the appellant was transferred vide Notification impugned herein above. (Copy of the transfer order is attached as annexure-E).

6. That appellant being seriously aggrieved of her transfer order assails the same before this honorable tribunal inter alia on the following grounds;

### Grounds

A. That the respondent has not treated the Appellant in accordance with law and rules on the subject and acted in violation of article-4 and 25 of the constitution of Islamic republic of Pakistan, 1973 and unlawfully transferred the appellant from one place to another before the completion of her three years tenure which is unjust, unfair hence not sustainable in the eye of law.

B. That the impugned transfer order would show that the post from which the appellant has been transferred has been kept vacant and no person has been transferred over the post in question which clearly speaks malafide of the respondent thus the impugned order is illegal, void on this score alone.

(3)

C. That the impugned transfer order is politically motivated and has been in colorful exercise of power thus is liable to set-aside on this score alone.

D. That the impugned Notification passed by the respondent is highly illegal, malafide, arbitrary, discriminatory, and whimsical untenable, without jurisdiction and without lawful authority and is thus liable to set-aside.


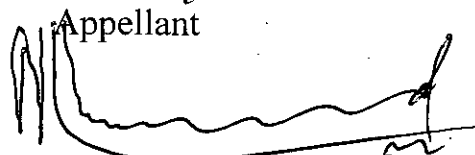
E. That the fundamental rights of the appellant have been badly violated because she has been made rolling stone by transferring from one place to another in short span of time while those who were appointed with the appellant through the same notification were not touched upon.

F. That the appellant seeks leave of this honorable tribunal to argue additional grounds at the time of final hearing of this appeal.

It is therefore respectfully prayed that on accept of this appeal prayer sought in the heading of the appeal may be allowed in favor of the appellant.

Any other remedy not specifically asked for but appropriate in the circumstances of the case may also be awarded to the appellant.

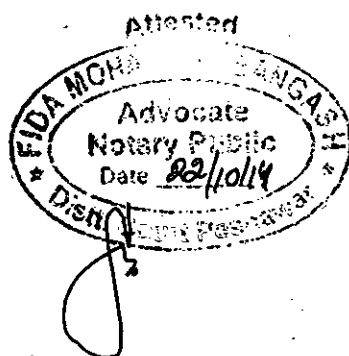
Through

  
Appellant  
  
Nasir Mahmood Advocate,  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.

Affidavit

I, do hereby declare, and affirm on oath that the contents of the appeal are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble tribunal.

Deponent





(4)

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.....\2014

Ms.Abida Parveen SDEO (F) BPS-17 E&SE, Takht Bhai, Mardan.....Appellant

Versus

Secretary Govt. of KPK, E&SE, Department Civil Secretariat,  
Peshawar.....Respondents

Application for suspending the operation of impugned Notification dated 17-10-2014 passed by the respondent till the final disposal of the instant appeal.

Respectfully sheweth;

- 1.That the captioned appeal is being filed before this Honorable Tribunal in which no date of hearing has yet been fixed.
- 2.That the grounds mentioned in the appeal may be read as an integral part of this application.
- 3.That on face of it the applicant\appellant has got a strong prima facie arguable case in his favor and is sanguine about its success.
- 4.That the balance of inconvenience tilts in favor of grant of interim relief.

(5)

5. That the interim relief if not granted to the applicant\appellant he would suffer irreparable loss not redeemable in terms of money.

It is, therefore, respectfully prayed that on acceptance of this application interim relief as prayed for in the heading of the application may be granted to the applicant's\appellant till the final disposal of the instant appeal.



Appellant

Through



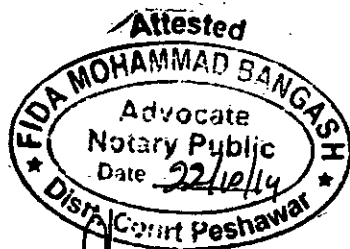
Nasir Mahmood Advocate  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.

Affidavit

I do hereby declare and affirm on oath that the contents of the above application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.



Deponent



(6)

Annexure "A"

Registered



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the, February 21, 2012

NOTIFICATION.

NO.SO(S)3-2/2012/DDO(Female). Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following as Deputy District Officers Management Cadre in BS-17 (Rs.16000-1200-40000) plus usual allowances as admissible under the rules in the on regular basis under the existing policy of the Provincial Government with immediate effect:-

S.#	Name/Father's Name & Address
1.	Ms. Hasrat Zahra D/O Syed Israr Hussain, House No. 192, Street No.3, Sector-4 KDA Kohat.
2.	Ms. Mehr-un-Nisa D/O Usmanullah, Mohallah Ghafoor Khan, Village Hakim Abad, Nowshera.
3.	Ms. Ghazala Anjum D/O Taj Muhammad C/O Miraj-ud-Din Mountain Inn, Chitral.
4.	Ms. Nadia D/O Wasiullah, Mohallah Yaseen Khail, Chamkani.
5.	Ms. Shahida Parveen D/O Mir Badshah Khan, C/O Shoaib Sultan, near Millat Girls School Kirri Alizai, D.I.Khan.
6.	Ms. Aniq Huma Touqeer D/O
7.	Ms. Hussan Ara D/O Shams-ur-Rehman, C/O Dr. Fazl Jamal, Mohallah Poli Baba, Tehsil Barawal Bandi Dir Upper.
8.	Ms. Jamila Rana D/O Hafizullah Khan, C/O Tahirullah Arain, Street Allah Dad Faqir, Mohallah Shekhan Wala Sabir Bazar, District Tank.
9.	Ms. Zahida Bibi D/O Khalilullah, C/O Din Nawaz Khan Senior Officer Zari Taraqati Bank Bannu.
10.	Ms. Fanoos Jamal D/O Mehmood Khan, House No.357020 Mohallah, Kokab Colony opposite Siraj Complex, D.I.Khan.
11.	Ms. Ghulam Fatima D/O Muhammad Hassan Khan, C/O Deputy District Officer E&SE Parova D.I.Khan.
12.	Ms. Rukhsana Rahim D/O HajiRahim Khan, Mohallah Seeni Village & P.O Lund Khawar Mardan.
13.	Ms. Jamila Munawar D/O Gul Munawar, Govt. Girls High School, PAF Shaheen Camp Peshawar.
14.	Ms. Shaheen Begum D/O Wali Muhammad, C/O Kashif Medicose Baiambat Bazaar, Timergara Dir Lower.
15.	Ms. Rehana Yasmeen D/O Roshan Din, Mohallah Ahmad Khan, Village & P.O Box Sarai Saleh, Haripur.
16.	Ms. Nighat Bibi D/O Muhammad Khan, Indus Medicose, Al-Mumtaz Plaza, near Qureshi Petrol Pump supply Mansehra Road, Abbottabad.
17.	Ms. Shazia Nawaz D/O Rab Nawaz, C/O Shoaib Karyana Store, near Islami Madrassa Mosque Mohallah Kotab Colony, Tank City.
18.	Ms. Safia Amin D/O Amin-ul-Haq, Mohallah Hajian Torangzai Tehsil & District Charsadda
19.	Ms. Dure Shawar D/O Jasmhaid Khan, House No.24, Street No.7 Rahat Abad Palosi Road, Peshawar.
20.	Ms. Aisha Saeed D/O Saeed Ahmed Awan, Al-Saeed Saba Colony Nawan Sher Abbottabad.

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(7)


21.	Ms. Sadia Aziz D/O Aziz-ur-Rehman, House No.KL-1106 Mohallah Kassim Kohla Kohat, Abbottabad.
22.	Ms. Hafsa Gul D/O Nushad Ali Khan, House No.1 Street 9, RahatAbad, Palosi Road, Peshawar.
23.	Ms. Sumera Sheraz D/O Sardar Khan, House No.84/228 Street No.17-B Gulbahar No.2 Peshawar.
24.	Ms. Abida Parveen D/O Lal Bahadar Mohallah Kumber Village & P.O Toru District Mardan.
25.	Ms. Laila Ali D/O Syed Ali Jan, Village & P.O Tangi Nusrat Zai, Tehsil Tangi, District Charsadda.
26.	Ms. Naila Arif D/O Dr. Abdul Latif C/O Sadullah Khan, Ex- Govt. Contractor, House No. C/3125, Mohallah Laghari, near Masjid papal Wali, D.I.Khan.
27.	Ms.Nargis Jabeen D/O Saifullah, House No.290/D Aria Samaj Tanchi Bazar Bannu

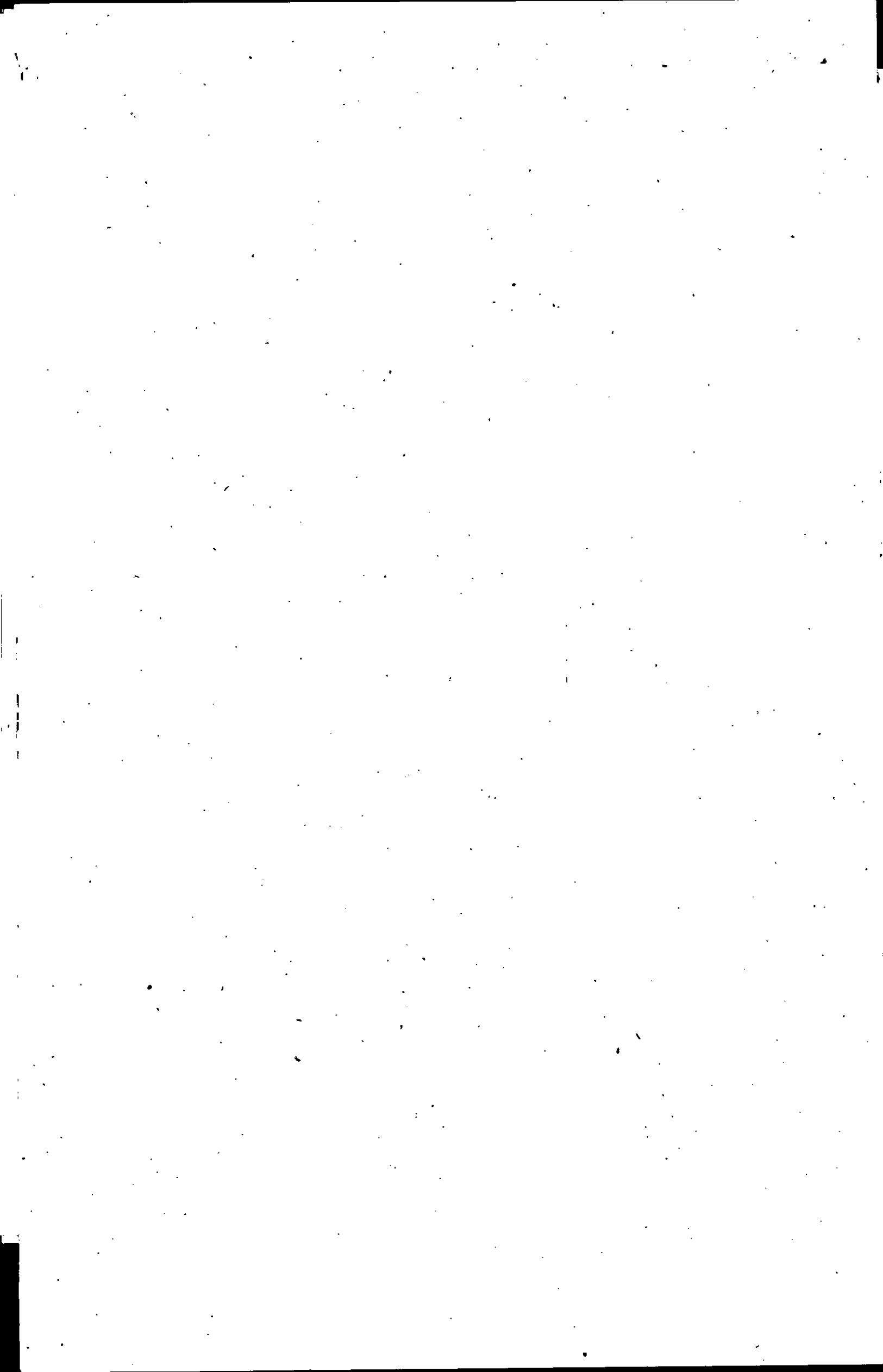
2- On their appointment, they are posted in E&SE offices in different Districts of Khyber Pakhtunkhwa as noted against each subject to the conditions given below:-

S.#	Name/Father's Name & Address	Proposed place of posting	Remarks
1	Ms. Hasrat Zahra D/O Syed Israr Hussain, House No. 192, Street No.3, Sector-4 KDA Kohat.	Deputy District Officer (Female) (BS-17) E&SE Kohat	Vice S.No.28
2	Ms. Mehr-un-Nisa D/O Usmanullah, Mohallah Ghafoor Khan, Village Hakim Abad, Nowshera.	Deputy District Officer (Female) (BS-17) E&SE Chitral	Vice S.No.29
3	Ms. Ghazala Anjum D/O Taj Muhammad C/O Miraj-ud-Din Mountain Inn, Chitral.	Deputy District Officer (Female) (BS-17) E&SE Mastooj at Booni Chitral	Vice S.No.30
4	Ms. Nadia D/O Wasiullah, Mohallah Yaseen Khail, Chamkani.	Deputy District Officer (Female) (BS-17) E&SE Lahor Swabi.	A.V.P
5	Ms. Shahida Parveen D/O Mir Badshah Khan, C/O Shoaib Sultan, near Millat Girls School Kirri Alizai, D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE D.I.Khan	Vice S.No.32
6	Ms. Aniq Huma Touqeer D/O Sher Ahmad Akhtar Khattak, C/O Qaisar Tanveer Khattak, Tariq Abad, D.I.Khan	Deputy District Officer (Female) (BS-17) E&SE Kulachi D.I.Khan	Vice S.No.31
7	Ms. Hussan Ara D/O Shams-ur-Rehman, C/O Dr. Fazl Jamal, Mohallah Poli Baba, Tehsil Barawal Bandi Dir Upper.	Deputy District Officer (Female) (BS-17) E&SE Dir Upper	Vice S.No.33
8	Ms. Jamila Rana D/O Hafizullah Khan, C/O Tahirullah Arain, Street Allah Dad Faqir, Mohallah Shekhan Wala Sabir Bazar, District Tank.	Deputy District Officer (Female) (BS-17) E&SE, Tank.	A.V.P
9	Ms. Zahida Bibi D/O Khalilullah, C/O Din Nawaz Khan Senior Officer Zari Taraqati Bank Bannu.	Deputy District Officer (Female) (BS-17) E&SE, Hangu.	-do-
10	Ms. Fanoos Jamal D/O Mehmood Khan, House No.357020 Mohallah, Kokab Colony opposite Siraj Complex, D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE, Takht-e-Nusrati Karak.	-do-
11	Ms. Ghulam Fatima D/O Muhammad Hassan Khan, C/O Deputy District Officer E&SE Parova D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE, Parova D.I.Khan.	Vice S.No.34
12	Ms. Rukhsana Rahim D/O HajiRahim Khan, Mohallah Seeni Village & P.O Lund Khawar Mardan.	Deputy District Officer (Female) (BS-17) E&SE, Sama Ranazai Malakand	A.V.P

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(8)

13	Ms. Jamila Munawar D/O Gul Munawar, Govt. Girls High School, PAF Shaheen Camp Peshawar.	Deputy District Officer(Female) (BS-17) E&SE, Banda Daud Shah Karak	Vice S.No.35
14	Ms. Shaheen Begum D/O Wali Muhammad, C/O Kashif Medicose Balambat Bazaar, Timergara Dir Lower.	Deputy District Officer (Female) (BS-17) E&SE, Timergara Dir Lower	A.V.P
15	Ms. Rehana Yasmeen D/O Roshan Din, Mohallah Ahmad Khan, Village & P.O Box Sarai Saleh, Haripur.	Deputy District Officer (Female) (BS-17) E&SE, Haripur.	-do-
16	Ms. Nighat Bibi D/O Muhammad Khan, Indus Medicose, Al-Mumtaz Plaza, near Qureshi Petrol Pump supply Mansehra Road, Abbottabad.	Deputy District Officer (Female) (BS-17) E&SE, Mansehra.	A.V.P
17	Ms. Shazia Nawaz D/O Rab Nawaz, C/O Shoaib Karyana Store, near Islami Madrassa Mosque Mohallah Kotab Colony, Tank City.	Deputy District Officer (Female) (BS-17) E&SE, Lakki Marwat	-do-
18	Ms. Safia Amin D/O Amin-ul-Haq, Mohallah Hajian Torangzai Tehsil & District Charsadda	Deputy District Officer (Female) (BS-17) E&SE, Charsadda	Vice S.No.36
19	Ms. Dure Shawar D/O Jasmhaid Khan, House No.24, Street No.7 Rahat Abad Palosi Road, Peshawar.	Deputy District Officer (Female) (BS-17) E&SE, Peshawar.	A.V.P
20	Ms. Aisha Saeed D/O Saeed Ahmed Awan, Al-Saeed Saba Colony Nawan Sher Abbottabad.	Deputy District Officer (Female) (BS-17) E&SE, Battagram.	Vice S.No.37
21	Ms. Sadia Aziz D/O Aziz-ur-Rehman, House No.KL-1106 Mohallah Kassim Kohla Kohal Abbottabad.	Deputy District Officer (Female) (BS-17) E&SE, Abbottabad	A.V.P
22	Ms. Hafsa Gul D/O Nushad Ali Khan, House No.1 Street 9, RahatAbad, Palosi Road, Peshawar.	Deputy District Officer (Female) (BS-17) E&SE, Nowshera.	Vice S.No.38
23	Ms. Sumera Sheraz D/O Sardar Khan, House No.84/228 Street No.17-B Gulbahar No.2 Peshawar.	Deputy District Officer (Female) (BS-17) E&SE, Swabi.	A.V.P
24	Ms. Abida Parveen D/O Lal Bahadar Mohallah Kumbar Village & P.O Toru District Mardan.	Deputy District Officer (Female) (BS-17) E&SE, Mardan	Vice S.No.41
25	Ms. Laila Ali D/O Syed Ali Jan, Village & P.O Tangi Nusrat Zai, Tehsil Tangi, District Charsadda.	Deputy District Officer (Female) (BS-17) E&SE, Tangi Charsadda.	Vice. S.No.39
26	Ms. Naila Latif D/O Dr. Abdul Latif C/O Sadullah Khan, Ex- Govt. Contractor, House No. C/3125, Mohallah Laghari, near Masjid papal Wali, D.I.Khan.	Deputy District Officer (Female) (BS-17) E&SE, Paharpur D.I.Khan	Vice S.No.40
27	Ms.Nargis Jabeen D/O Saifullah, House No.290/D Aria Samaj Tanchi Bazar Bannu	Deputy District Officer (Female) (BS-17) E&SE, Bannu.	A.V.P
<b>CONSEQUENTIAL POSTINGS/TRANSFERS</b>			
28.	Ms. Humera Syed, Deputy District Officer Female (BS-17) Chitral	Subject Specialist Mathematics, GGHSS Shakardara Kohat	A.V.P
29.	Ms.Zahra Jalal, Deputy District Officer Female (BS-17) Chitral.	Incharge District Officer (Female) Chitral till further orders and subject to the condition that she will not claim, seniority pay and allowances of the higher post.	she already holds as additional charge
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(12-A)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند

ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Date: 15/10/14

The SDB (CF) (SN)

Takht Bhai.

Amir Hope you will be fine

Mrs: Ghazala Shamim, Zakia Begum  
and Farzana wants to take loan  
against the salary. This is a legal  
practice as per Govt. policy, therefore,  
do the needed accordingly.

Best wishes and prof. prayers

Regards

Jamshid Khan  
15/10/14

JAMSHID KHAN  
Chairman  
Standing Committee E&T KPK  
PK-27 Mardan

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Cell: 0300-9323355-0345-9255633

Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

Residence  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt: Mardan

(12-8)

شہید ایم پی اے عمران خان ہمند-شہید ملت-ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان ہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref# \_\_\_\_\_

Respected Director (F) (P) (S) Date: 23/3/14  
Mardan.

ATB1

Hope you will be fine.  
Kiddly, issue transfer order of  
Mrs. Lubna Laila (PST) from GAPS  
Fazl. Laila Bano (PST) to  
GAPS Zorabai Laila (Sangra) (PST)  
against the vacant post. I shall  
be very much thankful to you.

Residence  
Faram Korona  
(Shamlat) Jalala  
Tehsil, Takhtbhai  
Distt: Mardan

Regards

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JAMSHID KHAN MOHMAND  
MPA P.A. 23/3/14  
Chairman Standing Committee E & I  
Khyber Pakhtunkhwa



(12-c)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند

ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Respected SDF-O (S)

Date: 11-1-14

Takht Bhai

ATM! Hope you will be fine.

Kindly, sort out the problem of the letter bearer. I shall be very much thankful to you.

Residence

Faram Korona

(Shamilat) Jalala

Tehsil Takhtbhai

Distt Mardan

Regards

Jamshid Khan Mohmand  
11-1-14

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Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa

Cell: 0300-9323355-0345-9255633

Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan



(12-D)

0333-6666106

Nadeem Shah Advocate

Joint Secretary (Peshawar Region)

Momin Khan House Takkar Road Takht Bhai, Mardan

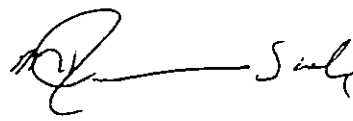
No. \_\_\_\_\_

Date \_\_\_\_\_

Dear Madam,

Hope you will be  
fine, I am sending  
Ali Akbar, his wife is  
facing some problem  
regarding her posting.  
Please help him out as  
much possible for you.

Regards.

 Nadeem Shah

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(13)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند

ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Date: 23/2/13

Respected S.D.F.O  
(F) on Takht Bhai

Adm Hope you will be fine,  
Kindly, open the salary  
of Mrs. Abida Begum P.S.T,  
since she is my relative.  
I shall be very much  
thankful to you

Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt: Mardan.

Regards

Jamshid Khan  
28/2/13

JAMSHID KHAN  
Chairman  
Standing Committee E&T KPK  
PK-27 Mardan

Cell: 0300-9323355-0345-9255633

Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

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(H)

(14.)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Respected Director, Date: 1/2/2014  
Mardan

AM! Hope you will be fine.

Kindly, appoint Mr. Fazal Khan  
S/o Gulandaz E/o Tekadar Kelli  
against the vacant post of Class 4  
(Chonkidar) in G.G.P.S Tekadar Kelli.  
I shall be very much thankful

to you

Residence:  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt: Mardan

Respect,

Jamshid Khan Mohmand

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Member Provincial Assembly  
Khyber Pakhtunkhwa

(15)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Respected SDEO F (Sh) Date: 27/10/13  
Jalali Bhai

Dear Sir,

Hope you will be fine,  
Kindly, issue Transfer order of  
Mrs. Nabeeda Akhtar (PST) from  
G.G.P.S Zain (Kasghar) F. Distt  
Charsadda To G.G.P.S Sultanate  
Killy Thar Dher PK-27 against the  
vacant post. I shall be very much  
thankful to you.

Regards

Jamshid 27/10/13

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Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa

(16)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند  
ممبر صوبائی اسمبلی خیبر پختونخوا

Ref# \_\_\_\_\_

Respected DEO (f) (sb)  
Mardan,

Date: 27/10/13

ADH/ Hope you will be fine  
Kindly, issue transfer order of Mrs.  
Najma Akram (PST) to the nearest  
station after getting promotion or may  
be retained at her school.  
I shall be very much thankful to  
you

Residence:  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt: Mardan.

Regards

27/10/13

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Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa

Cell: 0300-9323355-0345-9255633

Email: jamshid.khan.kpk@gmail.com www.facebook.com/jamshidmohmandkhan

(17)

To: The Executive District Education Officer (S&L)

Mardan.

Subject: Application for the Transfer from G.C.M.School Muhammad Ali Killi shah zaman Qala P/O sher garh Tehsil Takht Bhai Dist Mardan to G.G.P.School Safi Abad Hathian Tehsil Takht Bhai District Mardan.

Respected Sir

With reverence it is stated in your honor as under.

1. That I am presently serving as a PST at G.C.M.S Muhammad Ali Killi Shah Zaman Qala P/O Sher Garh.
2. There is Transportation problem while I am attending the said school.
3. There is no local Transport in the said area. So I rent a private taxi for the said school.
4. I spent more than 70% of my salary on Transportation to perform my duty.
5. I have two kids less then 5years, which is also a problem for me to go far away from my home /village.
6. Moreover, in my village Safi Abad Hathian There is a G.G.P. School.

It is, therefore, requested in your honor that I may please be transferred from G.C.M.School Muhammad Ali Killi of Shah Zaman Qala P/O Sher Garh Tehsil Takht Bhai District Mardan To G.G.P. School Safi Abad P/O Hathian Tehsil Takht Bahi District Mardan.

I will be very thankful to you for this act of kindness.

Dated: 8 October 2013

*Recommended as proposed in the application*  
*For Warant*  
*Alami 19/10/13*

Yours Sincerely,  
Rehana Yousaf  
G.C.M.S Muhammad Ali Killi  
P.O. Sher Garh Tehsil Takht Bahi  
District Mardan.

**Jawshid Khan Mohmand**  
Member Provincial Assembly  
Khyber Pakhtunkhwa

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**Muhammad Atif**  
Minister for Elementary & Secondary  
Education Khyber Pakhtunkhwa

(18)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند

ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Received DSOCP/ED Date: 10-11-13  
Mardan,

AOM. Hope you will be fine.  
Kindly, issue transfer order  
of Mrs. Farhana Islam (PST) from  
# G.P.S. Morcha Khan Killi to  
G.P.S. Janga Barak Khel. I shall  
be very much thankful to you

Residence:  
Faram Korona  
(Shamlat) Jalala  
Tehsil Takhtbhai  
Distt: Mardan.

Regards,

Jamshid Khan Mohmand

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa

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*[Signature]*



(19)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند

ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Date: 6/9/13

Respected S.D.Eo (Female) & T.E.O,  
Pakur Block -

Asm

Hope you will be fine,  
Please, adjust Mrs. Asma Bibi W/o  
Abdul Sattar in G.G.P.S Sher gahw-1  
against the vacating post of Bps-14.  
I shall be very much thankful  
To you.

Regards.

Asma 6/9/2013

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*[Signature]*

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa

خدمت ضابطہ ڈی ڈی او صاحبہ گوڈنٹ زنانہ ایجوکیشن ٹرسٹ بھالہ

جناب عالیہ

گزارش ہے کہ میں عرصہ دراز سے جی جی پی ایس مورچہ خاٹہ میں بطور PST ٹیچر ڈیوٹی سرانجام دے رہی ہوں۔ وہاں تک آنے جانے کے علاوہ مجھے کافی راستہ پیدل طے کرنا پڑتا ہے۔ لیکن اب چونکہ مجھے کمزور شہ پر تکلیف کا سامنا ہے۔ اسلئے ڈیوٹی سرانجام دینے میں وقت کا سافٹو ٹائمر ٹھیک ہے۔

چونکہ سنیارٹی لسٹ میں جی جی پی ایس سٹیڈی ٹیچر کے سکول ہی کی ٹیچرز کا نام آیا ہے۔ اور پچھلے آرڈر (سنوے سنہ) میں ان کا تبادلہ سنیارٹی کی بنیاد پر دوسرے سکولوں میں ہوا تھا۔ اور ان تمام ٹیچرز نے دوسرے سکولوں میں جارج بھی بخش لیا تھا۔

مجھے افسوس ہے کہ ان ٹیچرز کا تبادلہ اس بار بھی ہوگا۔ چونکہ میں مورچہ سٹیڈی ٹیچر کی مستقل پوسٹ پر ہوں۔ اور تکلیف ہی وجہ سے دور دراز کے علاقے میں ڈیوٹی انجام دینے میں مستقل کا سامنا ہے لہذا آپ صاحبان سے درخواست ہے کہ میرا تہہ بہہ تبادلہ جی جی پی ایس ٹیچر کے سکول میں ہو۔  
عین تہہ بہہ ہوگی۔

عہدہ

انجلی تابع فرمان میں صاحبہ جی جی پی ایس مورچہ خاٹہ۔  
جی جی پی ایس مورچہ خاٹہ۔ تحصیل ٹنٹ بھالہ۔

Anne Bin

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Am

(21)

Annexure "D"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDANOFFICE ORDER.

As proposed by the SDEO(F) Takht Bhai vide her No 1769 dated 15/2/2014, The following PST,s are hereby transferred to the schools noted against each on administrative ground on their own pay and EPS, with immediate effect in the interest of public service.

S.No	Name of teacher / School	Adjusted At	Remarks.
1	Hamida GGPS Takar	GGPS Zairullah Banda	Adm:Ground
2	Nihayat GGPS, Takkar	GGPS, Suhbat Serai	-do-
3	Husan Taraj GGPS, Takkar	GGPS, Suhbat Serai	-do-
4	Robina Rehmat GGPS, No 1 Takht Bhai	GGPS, Said Mir Killi	-do-
5	Hina Naik Amal GGPS, No 1 Takht Bhai	GGPS, Said Mir Killi	-do-
6	Zeenaat GGPS, Takkar	GGPS, Muhammad Din Killi	-do-
7	Roman Begum GGPS, Moh: Din Killi	GGPS, Takkar	-do-
8	Dilpasanda GGPS, Shah Zaman Qila	GGPS, Muhammad Shah Killi	-do-
9	Farida Gul GGPS, Muhd: Shah Killi	GGPS, Sher Garh No 2	-do-

Note: NO TA/DA is allowed

Charge report should be submitted to all concerned.

(ZUHRA KHUNZADA)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

The DEO (F) S.O.  
Please Cancel their  
order and oblige  
JAMSHID KHAN

Endst: NO 803-G / Dated: 20/2/14

Copy forwarded to the;

1. Sub Divisional Education Officer (F) Takht Bhai.
2. Head teacher concerned.
3. Teacher Concerned.

DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

JAMSHID KHAN  
Chairman  
Standing Committee E&T/KPK  
PK-27 Mardan

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(22)

شہید ایم پی اے عمران خان مہمند - شہید ملت - ایک ناقابل فراموش کردار

Jamshid Khan Mohmand  
Member Provincial Assembly  
Khyber Pakhtunkhwa



جمشید خان مہمند

ممبر صوبائی اسمبلی خیبر پختونخوا

Ref # \_\_\_\_\_

Respected SDEO (Fish)

Date: 25-3-2014

Takht Bhai.

ATM/ Hope you will be fine  
Killy, Cancel the transfer order  
of the 9 numbers of teaching staff  
in light of the inquiry report  
of the inquiry committee. This  
is most important since they belong  
to my constituency. Best wishes  
and profound prayers.

Residence:

Faram Korona

(Shamilat) Jalala

Tehsil Takhtbhai

Distt: Mardan.

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25/3/14

JAMSHID KHAN MOHMAND  
MPA 199-29  
Member Provincial Assembly  
Khyber Pakhtunkhwa

(23)

Annexure "E"



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the, October 17, 2014.

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2014/DDEO & SDEO (F): The following posting / transfer of female officers are hereby ordered in the interest of public service with immediate effect:-

S.No	Name, Designation & place of posting	To	Remarks
1.	Ms. Neelofar Kamran Subject Specialist English (BS-18) GGHSS No.2 Bannu under transfer as DDEO (F) Kohistan. (Teaching Cadre)	Subject Specialist English (BS-18) GGHSS No.2 Bannu	Notification of this department dated 28-04-2014 is hereby with drawn
2.	Ms. Abida Parveen SDEO (F) (BS-17) Takht Bhai, Mardan (Management Cadre)	SDEO (F) (BS-17) Batkhela, Malakand	Against Vacant Post
3.	Ms. Sayeda Nishat Akhtar SDEO (F) (BS-17) Mardan (Teaching Cadre)	SDEO (F) (BS-17) Dargai, Malakand	-do-
4.	Ms. Yasmin Aziz Subject Specialist (BS-17) DCTE Abbottabad (Teaching Cadre)	SDEO (F) (BS-17) Haripur	-do-

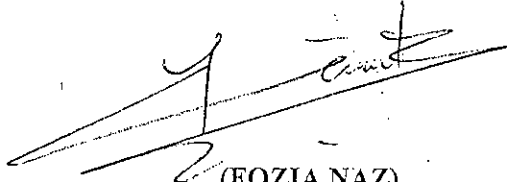
2. No TA/DA allowed.

SECRETARY

Endst.of even No & date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. Director DCTE Khyber Pakhtunkhwa, Abbottabad.
4. District Education Officer (F) concerned.
5. District Accounts Officer concerned.
6. Section Officer-I Chief Minister's Secretariat Khyber Pakhtunkhwa.
7. Incharge EMIS, E&SE Department.
8. PS to Minister E&SE Khyber Pakhtunkhwa.
9. PS to Secretary E&SE Department.
10. Officer concerned.
11. Office order file.

  
(FOZIA NAZ)  
SECTION OFFICER (S/F)

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True Copy



44

http://www.dailymashriq.com.pk

اللہ ہی کیلئے ہیں مشرق و مغرب (القرآن)

**DAILY MASHRIQ PESHAWAR**

روزنامہ  
سیدنا میر شاہ  
عہدہ کے بانی  
پشاور

**مشرق**

سلسلہ اشاعت کے 47 سال

ABC CERTIFIED

پشاور اسلام آباد بیک وقت شائع ہونے والا کثیر الاشاعت قومی اخبار

جلد 47 بدھ 10 جمادی الاول 1435ھ 12 مارچ 2014ء 26 پاجاگن قیمت 12 روپے

شمارہ 204

اللہ ہی کیلئے ہیں مشرق و مغرب (القرآن)

**مشرق**

پشاور اسلام آباد

mashriq@brain.net.pk

بدھ 10 جمادی الاول 1435ھ 12 مارچ 2014ء

### تخت بھائی کی طالبات کی مشکل

تحصیل تخت بھائی میں متعدد گورنر انٹرنی سکول استانیات نہ ہونے کے باعث بند ہوئے اور دو درجن کے قریب گورنر انٹرنی سکول صرف ایک استانی کے سہارے چلنے کی اطلاعات سے اس امر کا اظہار ہوتا ہے کہ محکمہ تعلیم کے حکام کو ابھی خواب غفلت تھے چگانے کے لئے کی ایک تخت استانیات کی ضرورت ہے۔ ہمارے نمائندے کے مطابق پوئین کونسل ساڈو شاہ میں واقع گورنر انٹرنی سکول تخت بھائی اور گورنر انٹرنی سکول سید میر علی پوئین کونسل کوٹ جھوٹا ایک عرصہ سے استانیات نہ ہونے کے باعث مکمل طور پر بند ہیں جبکہ میں نے زائد گورنر انٹرنی سکولوں کو صرف ایک استانی چلا رہی ہیں۔ ان سکولوں سے

زیادہ تر خواتین پھرتیے سیاسی اثر و رسوخ کی بناء پر اپنی سب پرند بگبوں پر تامل کر دئے ہیں جس سے یہ سکول مکمل طور پر دیوان ہو گئے ہیں۔ ڈپٹی ڈی ای او زتانہ کی جانب سے صورتحال کی رپورٹ اعلیٰ حکام کو بھجوانے کے بعد اسی مد میں خاموشی بھول بالا صورتحال میں محکمہ تعلیم کے حکام اور مکمل طور پر سیاسی شخصیات اور عوامی نمائندوں کی ملی بھگت اور دلچسپی کا اندازہ ہوتا ہے جو اصلاح احوال کی راہ میں سب سے بڑی رکاوٹ ہے۔ اس طرح کی صورتحال میں تعلیمی سطح کی زتانہ امر کا بے رست دیا ہوا بھی اس امر پر دال ہے کہ محکمہ کی جانب سے بطور نگران اور منظم کے اس کے کردار کو نہ قبول کیا جا رہا ہے اور نہ ہی ان کو کام کرنے کا موقع اور ماحول دیا جا رہا ہے۔ اس طرح کی صورتحال سیاسی اور محکمہ تعلیم کے ارباب اختیار کی ملی بھگت اور ان کی طرف سے شوشے اور چشم پوشی اختیار کرنے کے علاوہ ممکن نہیں۔ یقیناً محکمہ تعلیم میں یہ کوئی پہلی مثال نہیں بلکہ آئے روز اخبارات میں اس طرح کی شکایات سامنے آتی ہیں لیکن البتہ یہ ہے کہ صورتحال کی نشاندہی کے باوجود بھی سرکاری مشینری حرکت میں نہیں آتی۔ وزیر اعلیٰ خیبر پختونخوا پر ذرا پر خلک اور صوبائی وزیر تعلیم نے اگر اس طرح کی صورتحال کا سخت نوٹس لیا تو سینکڑوں طالبات کی تعلیم سے محرومی پیشانی ہے۔ وزیر اعلیٰ کی شکایات میں کو اخبارات میں اس طرح کی شکایات پر فوری نوٹس لینے کے اصلاح احوال یعنی نیک عوام کو سیدیا کو اس بارے آگاہ کرنے پر خصوصی توجہ کی ضرورت ہے تاکہ اس طرح کی حکماہ غفلت اور بد عملیوں پر تکرار نہ ہو سکے۔

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H

# کھڑکیاں

واقعات کی ذمہ دار سندھ حکومت

## وزیر اعلیٰ سندھ نے ذمہ داری

اسلام آباد (پریس رپورٹ) سپریم کورٹ میں سرکار کے میں بچوں کی اصوات کے از خود نوٹس کی سماعت کے دوران سندھ حکومت نے کہا ہے کہ قرمیں اصوات (بقیہ 74 صفحہ 10)

DAILY MASHRIQ PESHAWAR

پشاور روزنامہ

# مشرق

مستقل اشاعت کے 47 سال



پشاور، اقرا، پشلیو نیورسٹی کے چائرس عیدالرحمن ادارے کی سالانہ تقریب سے خطاب کر رہے ہیں

## تحقیقیاتی مہتمم و گورنر پرائمری سکول استانیانہ ہونے کے باعث

20 سے زیادہ سکولوں کی سرپرستی ایک ایک استانی ادارہ ہے 210 سکولوں میں زیادہ تر کو اساتذہ اور بنیادی سہولیات کی کمی کا سامنا ہے

اساتذہ کی تنخواہیں کم ہیں اور ان کی سہولیات بھی کم ہیں۔ ان کی تنخواہیں صرف ایک استانی ادارہ کے ہمارے ہیں۔ یہ ہیں اس

تحقیقیاتی مہتمم (اساتذہ مشرق) تحصیل تخت ہمالی میں  
 متعدد گورنر پرائمری سکول استانیانہ ہونے کے باعث  
 بند ہیں جبکہ ذمہ داری کے قریب گورنر پرائمری سکول  
 صرف ایک استانی کے ہمارے ہیں۔ یہ ہیں اس  
 (بقیہ 75 صفحہ 10)

حالیہ اترا خراب نہیں ہمتا سہ ایمان لرا ہے۔

75	سکول بند
----	----------

مستقل میں معلوم ہوا ہے کہ پوئین کول ساؤڈیٹا میں راج  
 گورنر پرائمری سکول صحت سیری اور گورنر پرائمری سکول سیر  
 کے پوئین کول کٹ جھکوا ایک سرپرست ہے استانیانہ  
 ہونے کے باعث کول طرز پر بند پڑنے ہیں جبکہ میں سے  
 ڈاکٹر گورنر پرائمری سکولوں کو صرف ایک استانی ادارہ  
 میں تحصیل تخت ہمالی میں اس وقت گورنر پرائمری سکولوں کی  
 کل تعداد 210 ہے اور زیادہ تر سکولوں میں بچوں کی کمی کے  
 سکولوں کے علاوہ بننے کے پالی اور پشلیو نیورسٹی کے  
 عدم دستیابی ہے۔ مسائل کا بھی سامنا ہے ان سکولوں سے  
 زیادہ تر خواتین بچہ پڑھنے کی سہولیات کی کمی کا سامنا ہیں  
 پند سکولوں پر چارے گرانے ہیں جن میں سے کوئی سکول  
 پر دوران ہو کے ہیں اس سلسلے میں تحصیل تخت ہمالی اور  
 ایکویٹس آفیسر پرائمری ذمہ داری تحصیل تخت ہمالی سرپرست مابعد  
 حکم سے رابطہ کیا گیا تو انہوں نے متعدد گورنر سکولوں کی عدم  
 شائبہ کے باعث بندش اور اساتذہ کی کمی کی تصدیق کی اور کہا  
 کہ انہوں نے اس کی عملی رپورٹ جھکوا سرپرست تحصیل تخت ہمالی  
 حکام کو پیش کی ہے لیکن حال اس پر کارروائی عمل میں نہیں لائی  
 گئی انہوں نے کہا کہ حکم تعلیم کی پالیسی کے مطابق ہر گورنر  
 پرائمری سکول میں دو بچہ پڑھانے کا ہونا لازمی ہے تحصیل تخت ہمالی  
 کے ذمہ داری صحت سیری اور سیر پرائمری سکول کے گورنر پرائمری  
 سکولوں سے اساتذہ کے کن پند شائبہ پر سکولوں میں  
 تیاروں کے باعث زیادہ سے زیادہ سہولیات مگروں میں  
 چھوٹی ہیں

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بعدالت جناب کے پی کے سرو میں شہنشاہ

شہنشاہ

مورخہ  
مقدمہ  
دعویٰ  
جرم

2، پنجاب  
بنام صاحب دست  
سرو میں شہنشاہ  
سرو میں شہنشاہ

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام شہنشاہ کیلئے نام سرو میں شہنشاہ کی طرف سے  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی براہگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پرداخت منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ اخذائے مقدمہ کے  
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب اپنے ہونے سے  
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2044

ماہ اکتوبر

22

المرقوم

العبد گواہ العبد

کے لئے منظور ہے۔

شہنشاہ

مقام



VAKALATNAMA

IN THE COURT OF Khyber Pakhtunkhwa Service  
Tribunal Peshawar OF 2015

Mst. Abida Parveen (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Govt. of KPK (RESPONDENT)  
(DEFENDANT)

I/We Abida Parveen

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2015

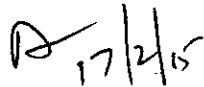


CLIENT



ACCEPTED

**NOOR MOHAMMAD KHATTAK**  
(ADVOCATE)



OFFICE:

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

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

**APPEAL NO. /2014**

**Abida Parveen**

**VS**

**Govt: of KPK**

**APPLICATION FOR ALLOWING AMENDED APPEAL**

**R/SHEWETH:**

- 1- That the above mentioned appeal is pending adjudication before this august Service Tribunal in which 17/10/2015 date is fixed for hearing.
- 2- That appellant filed the above mentioned appeal against the impugned transfer order dated 17.10.2014 whereby the appellant was transferred pre maturely and due to political interference.
- 3- That Counsel for appellant seeks permission of this august Service Tribunal to make amendments in the memo of appeal along addition of certain requisite documents.

It is therefore most humbly prayed that on acceptance of this application the appellant may very kindly be allowed to file amended appeal. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**APPELLANT**



**ABIDA PARVEEN**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

*Allowed*

*17/2/15*

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

Service appeal No: 1275/2014

**Mst: Abida Parveen SDEO(F) Takht Bhai, Mardan**

.....Appellant

**Versus**

Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, & others.

.....Respondents

**PARAWISE COMMENTS FOR AND ON BEHALF OF THE RESPONDENTS No: 1-3.**

Respectfully Sheweth :-

The Respondents Submit as under :-

**PRELEMENARY OBJECTIONS.**

- 1 That the instant appeal is badly time barred.
- 2 That the appellant has got no cause of action/locus standi.
- 3 That the appellant has not come to this Honorable Tribunal with clean hands.
- 4 That the instant appeal is not maintainable in its present form.
- 5 That the appellant has concealed important material facts from this Honorable Tribunal.
- 6 That the appellant has filed this appeal with malafide motives .
- 7 That the instant appeal has been filed to pressurize the respondents.
- 8 That the present appeal is bad for non joinder/ mis joinder of necessary parties.
- 9 That the appellant is not competent to file the instant appeal against the respondents.
- 10 That the appellant is not entitled for the relief she has claimed.
- 11 That the order dated 17/10/2014 is legally competent & is liable to be maintained.
- 12 That under Section 10 of the Khyber Pakhtunkhwa Civil Servant Act 1973. "Every civil Servant shall be liable to serve any where within the Province, including the appellant.
- 13 That a civil servant can hold a post during the pleasure of the competent authority.
- 14 That the appellant want to stick to the post of SDEO (F) Mardan post and thus pursuing posting of the choice in violation of the provisions, contained in the Khyber Pakhtunkhwa Civil Servant ( Appointment /Promotion & Transfer) rules, 1987 and posting transfer policy of the Provincial Government.
- 15 That the post of SDEO (F) is Provincial Cadre and also not a tenure oriented post.
- 16 That the appellant has completed her normal tenure in the office of the Respondent No: 3.

0-10  
17-04/15

## ON FACTS

- 1 That Para-1 needs no comments being pertains to the service record of the appellant.
- 2 That Para-2 is correct to the extant that the appellant has been posted against SDEO(F) post Takht Bhai District Mardan vide corrigendum / Notification No: SO (S/F) E&SE/3-2/2012 /DDO(F) dated 27/2/2012 issued by the Respondent No: 2.
- 3 That Para-3 needs no comments on the grounds that the issue here in this appeal is the transfer of the appellant against SDEO(F) post from District Mardan to Malakand under the discretionary powers of the competent authority which says that a civil servant shall have to serve wherever her services are required by the competent authority being a management cadre post for the whole Khyber Pakhtunkhwa having no question of tenure completion prior to the transfer order.
- 4 That Para-4 is incorrect & denied, the impugned order dated 17-10-2014 is in the public interest & according to the mandatory provision of Section-10 of Civil Servant Act 1973.
- 5 That Para-5 is incorrect & denied, detail reply has been given in Para-3 & 4.
- 6 That Para-6 is incorrect & denied on the grounds that no departmental appeal has been filed by the appellant nor any such record / copy of the same is available in the office of the competent authority whereas the copy of the departmental appeal dated 26-10-2014 as annexed by the appellant as Annexure-I is based on malafide intentions. However the Respondents No: 1-3 further submit on the following grounds inter alia :-


## ON GROUNDS

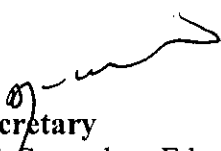
- A That ground A is incorrect & denied. The appellant has been treated as per law, rules & transfer policy under the jurisdiction of the competent authority & the mentioned order dated 17-10-2014 is legal duly issued by competent authority in the light of the facts and circumstances of the case, hence is liable to be maintained in favour of the respondents.
- B That ground-B is incorrect & not admitted. The appellant has been treated in the instant case as per law, rules & transfer policy & the SDEO(F) post is one of the Management Cadre in the Elementary & Secondary Education Department and the same is not tenure oriented.
- C That the ground-C is incorrect and not admitted. Reply has been given in ground A&B.
- D That ground-D is incorrect and not admitted. The order dated 17-10-2014 is legally competent in public interest & is liable to be maintained in favour of the respondents as submitted in para-3, 4 & grounds-A & B of the instant reply.
- E That ground-E is incorrect and not admitted. The statement of the appellant in this para is false, baseless against law, rules, facts manufactured one, without any legal proof, without any legal support, based on malafide motives and even against the norms of natural justice. Hence denied.
- F That ground-F is incorrect & denied, detail reply has been given in the above paras.
- G That ground-G is incorrect & denied, detail reply has been given in the above paras.

H That ground-H is incorrect & not admitted. The appellant has been treated in the instant case as per law, rules & transfer policy & the SDEO(F) post is one of the Management Cadre in the Elementary & Secondary Education Department and the same is not tenure oriented, hence the order dated 17-10-2014 is liable to be maintained in favour of the Respondents.

I That ground-I needs no comments, however the Respondents seek leave of this Honorable Tribunal to advance additional grounds & record at the time of arguments on main appeal.

**In view of the above made submissions, it is humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favor of the respondents Department.**

  
**Director**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

  
**Secretary**  
Elementary & Secondary Education  
Department Khyber Pakhtunkhwa,  
Peshawar.

( Respondents No. 142 )

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

Service appeal No: 1275/2014

**Mst: Abida Parveen SDEO(F) Takht Bhai, Mardan**

.....Applicant

**Versus**

Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, & others.

.....Respondents

**REPLY TO THE STAY APPLICATION FOR SUSPENSION OF OPERATION OF THE  
IMPUNGED ORDER DATED 17/10/2014 ON BEHALF OF RESPONDENTS No: 1-3.**

Respectfully Sheweth :-

**The Respondents Submit as under :-**

**PRELEMENARY OBJECTIONS.**

- 1 That the instant application is badly time barred.
- 2 That the applicant has got cause of action/locus standi.
- 3 That the applicant has not come to this Honorable Tribunal with clean hands.
- 4 That the application is not maintainable in its present form.
- 5 That the application has concealed important material facts from this Honorable Tribunal.
- 6 That the application has filed this appeal with malafide motives .
- 7 That the instant application has been filed to pressurize the respondents.
- 8 That the present application is bad for non joinder/ mis joinder of necessary parties.
- 9 That the appellant is not competent to file the instant appeal against the respondents.
- 10 That the application is not entitled for the relief she has claimed.
- 11 That the order dated 17/10/2014 is legally competent & is liable to be maintained.
- 12 That under Section-10 of the Khyber Pakhtunkhwa Civil Servant Act 1973. "Every civil Servant shall be liable to serve any where within the Province, including the applicant.
- 13 That a civil servant can hold a post during the pleasure of the competent authority.
- 14 That the applicant want to stick to the post of SDEO (F) post and thus pursuing posting of the choice in violation of the provisions, contained in the Khyber Pakhtunkhwa Civil Servant ( Appointments / Promotion & Transfer) rules, 1987 and posting transfer policy of the Provincial Government.
- 15 That the post of SDEO(F) is Provincial Cadre and also not a tenure oriented post.


**ON FACTS**


- 1 That Para-I needs no comments.

- 2 That Para-2 is also incorrect & denied on the grounds that the three ingredients necessary for the grant of stay in the instant case do not go in favour of the appellants.
- 3 That Para-3 is incorrect & denied the transfer order dated 17/10/2014 has been issued under the relevant law in accordance with the facts & circumstances of the case in the interest of public service being a Provincial cadre post by the competent authority.
- 4 That Para-4 needs no comments, however the facts & grounds as agitated by the Respondents in the reply to the main appeal may also be treated as an integral part of this reply to the application of the appellants.

**In view of the above made submissions, it is humbly requested that this Honorable Tribunal may very graciously be pleased to vacate the status quo order & to dismiss the instant application with cost in favor of the respondent Department.**

Dated 09/4/2015

  
**Director**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

  
**Secretary**  
Elementary & Secondary Education  
Department Khyber Pakhtunkhwa,  
Peshawar.

( Respondents No. 142 )

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

**APPEAL NO. 1275/2014**

**ABIDA PARVEEN                      VS                      EDUCATION DEPARTMENT**

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE**  
**TO THE REPLY SUBMITTED BY THE RESPONDENT NO.1**  
**TO 3**

**R/SHEWETH:**

**PRELIMINARY OBJECTIONS:**  
**(1 TO 16):**

All the preliminary objections raised by the respondent No.1 to 3 are incorrect, false, concocted, baseless and not in accordance with law and rules rather the respondent No.1 to 3 are estopped due to their own conduct to raise any objection at this stage of the appeal.

**ON FACTS:**

- 1- Admitted correct by the respondents hence need no comments.
- 2- Admitted correct by the respondents hence need no comments.
- 3- Incorrect and not replied accordingly. That the impugned transfer order dated 17/10/2014 was issued by the respondents on the directions of local MPA namely Mr. Jamshed Khan. That the recommendation for transfer of the appellant was made by the said MPA on the reason that the said MPA wants to posted his nears and dears on his own sweet well. That inspite of asserting undue influence on the appellant by the concerned MPA, the appellant did not surrender herself i.e. by not obeying the illegal orders of the said MPA. That due to the above mentioned reason the respondents instead of encouraging the appellant for her brave and legal stance transferred the appellant from the post of SDO (F) Takht Bhai to SDO (F) Batkhela vide impugned order dated 17/10/2-14.



- 4- Incorrect and misconceived. That the impugned transfer order dated 17/10/2014 was issued on the direction of Local MPA namely Mr. Jamshed Khan. That the said impugned order was in total violation of transfer/posting policy. Moreover the said impugned order dated 17.10.2014 and has not been passed/issued by the respondents in the public interest nor exigencies of public service.
- 5- Incorrect and not replied accordingly. That as stated above in Para-3 and 4, that the said impugned transfer order was issued on the direction of local MPA, therefore the said order is not tenable and liable to be set aside. Moreover appellant is unmarried female and her parents are residing at District Mardan, therefore the appellant is an entitled to be retained at District Mardan under the policy and regulation there under.
- 6- Incorrect and not replied accordingly. That appellant feeling aggrieved from the impugned order dated 17/10/2014 filed Departmental appeal before the appellate authority on 30/10/2014 waited for ninety days and then she came to this august tribunal within 30 days for the redressal of her grievance.

**GROUND:**  
**(A TO G):**

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent No.1-3 are incorrect and baseless. That the impugned transfer order dated 17/10/2014 was issued by the respondents on the directions of local MPA namely Mr. Jamshed Khan. That the recommendation for transfer of the appellant was made by the said MPA on the reason that the said MPA wants to posted his nears and dears on his own sweet well That inspite of asserting undue influence on the appellant by the concerned MPA, the appellant did not surrender herself i.e. by not obeying the illegal orders of the said MPA. That due to the above mentioned reason the respondents instead of encouraging the appellant for her brave and legal stance transferred the appellant from the post of SDO (F) Takht Bhai to SDO (F) Batkhela vide impugned order dated 17/10/2-14. That the impugned order dated 17-10-2014 is against the law, facts , norms natural justice and material on record hence not tenable and liable to be set aside. That the impugned order dated 17-10-2014 is against the clause I, II and IX of the transfer/posting policy of the government of Khyber Pakhtunkhwa. Moreover appellant is an unmarried female and her parents are residing at District Mardan, therefore the appellant is entitled to be retained at District Mardan under the policy and regulation there under.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may please be accepted as prayed for.

Dated:6.5.2015

**APPELLANT**



**ABIDA PARVEEN**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

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

Service appeal No: 1275/2014

**Mst: Abida Parveen SDEO(F) Takht Bhai, Mardan**

.....Applicant

**Versus**

Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, & others.

.....Respondents

**REPLY TO THE STAY APPLICATION FOR SUSPENSION OF OPERATION OF THE  
IMPUNGED ORDER DATED 17/10/2014 ON BEHALF OF RESPONDENTS No: 1-3.**

Respectfully Sheweth :-

**The Respondents Submit as under :-**

**PRELEMENARY OBJECTIONS.**

- 1 That the instant application is badly time barred.
- 2 That the applicant has got cause of action/locus standi.
- 3 That the applicant has not come to this Honorable Tribunal with clean hands.
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- 10 That the application is not entitled for the relief she has claimed.
- 11 That the order dated 17/10/2014 is legally competent & is liable to be maintained.
- 12 That under Section-10 of the Khyber Pakhtunkhwa Civil Servant Act 1973. "Every civil Servant shall be liable to serve any where within the Province, including the applicant.
- 13 That a civil servant can hold a post during the pleasure of the competent authority.
- 14 That the applicant want to stick to the post of SDEO (F) post and thus pursuing posting of the choice in violation of the provisions, contained in the Khyber Pakhtunkhwa Civil Servant ( Appointments / Promotion & Transfer) rules, 1987 and posting transfer policy of the Provincial Government.
- 15 That the post of SDEO(F) is Provincial Cadre and also not a tenure oriented post.


**ON FACTS**

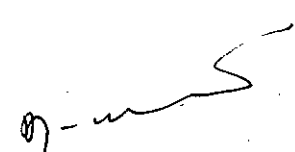
- 1 That Para-I needs no comments.

- 2 That Para-2 is also incorrect & denied on the grounds that the three ingredients necessary for the grant of stay in the instant case do not go in favour of the appellant.
- 3 That Pra-3 is incorrect & denied the transfer order dated 17/10/2014 has been issued under the relevant of law in accordance with the facts & circumstance of the case in the interest of public service being a Provincial cadre post by the competent authority.
- 4 That Para-4 needs no comments, however the facts & grounds as agitated by the Respondents in the reply to the main appeal may also be treated as an integral part of this reply to the application of the appellant.

**In view of the above made submissions, it is humbly requested that this Honorable Tribunal may very graciously be pleased to vacate the status quo order & to dismiss the instant application with cost in favor of the respondent Department.**

Dated 09/4/2015

  
**Director**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

  
**Secretary**  
Elementary & Secondary Education  
Department Khyber Pakhtunkhwa,  
Peshawar.

( Respondents No. 1 & 2 )

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

**APPEAL NO. 1275/2014**

**ABIDA PARVEEN**

**VS**

**EDUCATION DEPARTMENT**

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE**  
**TO THE REPLY SUBMITTED BY THE RESPONDENT NO.1**  
**TO 3**

**R/SHEWETH:**

**PRELIMINARY OBJECTIONS:**  
**(1 TO 16):**

All the preliminary objections raised by the respondent No.1 to 3 are incorrect, false, concocted, baseless and not in accordance with law and rules rather the respondent No.1 to 3 are estopped due to their own conduct to raise any objection at this stage of the appeal.

**ON FACTS:**

- 1- Admitted correct by the respondents hence need no comments.
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- 3- Incorrect and not replied accordingly. That the impugned transfer order dated 17/10/2014 was issued by the respondents on the directions of local MPA namely Mr. Jamshed Khan. That the recommendation for transfer of the appellant was made by the said MPA on the reason that the said MPA wants to posted his nears and dears on his own sweet well. That inspite of asserting undue influence on the appellant by the concerned MPA, the appellant did not surrender herself i.e. by not obeying the illegal orders of the said MPA. That due to the above mentioned reason the respondents instead of encouraging the appellant for her brave and legal stance transferred the appellant from the post of SDO (F) Takht Bhai to SDO (F) Batkhela vide impugned order dated 17/10/2-14.

- 4- Incorrect and misconceived. That the impugned transfer order dated 17/10/2014 was issued on the direction of Local MPA namely Mr. Jamshed Khan. That the said impugned order was in total violation of transfer/posting policy. Moreover the said impugned order dated 17.10.2014 and has not been passed/issued by the respondents in the public interest nor exigencies of public service.
- 5- Incorrect and not replied accordingly. That as stated above in Para-3 and 4, that the said impugned transfer order was issued on the direction of local MPA, therefore the said order is not tenable and liable to be set aside. Moreover appellant is unmarried female and her parents are residing at District Mardan, therefore the appellant is an entitled to be retained at District Mardan under the policy and regulation there under.
- 6- Incorrect and not replied accordingly. That appellant feeling aggrieved from the impugned order dated 17/10/2014 filed Departmental appeal before the appellate authority on 30/10/2014 waited for ninety days and then she came to this august tribunal within 30 days for the redressal of her grievance.

**GROUND:**  
**(A TO G):**

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent No.1-3 are incorrect and baseless. That the impugned transfer order dated 17/10/2014 was issued by the respondents on the directions of local MPA namely Mr. Jamshed Khan. That the recommendation for transfer of the appellant was made by the said MPA on the reason that the said MPA wants to posted his nears and dears on his own sweet well That inspite of asserting undue influence on the appellant by the concerned MPA, the appellant did not surrender herself i.e. by not obeying the illegal orders of the said MPA. That due to the above mentioned reason the respondents instead of encouraging the appellant for her brave and legal stance transferred the appellant from the post of SDO (F) Takht Bhai to SDO (F) Batkhela vide impugned order dated 17/10/2-14. That the impugned order dated 17-10-2014 is against the law, facts , norms natural justice and material on record hence not tenable and liable to be set aside. That the impugned order dated 17-10-2014 is against the clause I, II and IX of the transfer/posting policy of the government of Khyber Pakhtunkhwa. Moreover appellant is an unmarried female and her parents are residing at District Mardan, therefore the appellant is entitled to be retained at District Mardan under the policy and regulation there under.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may please be accepted as prayed for.

Dated:6.5.2015

**APPELLANT**



**ABIDA PARVEEN**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

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

**APPEAL NO. 1275/2014**

**ABIDA PARVEEN                      VS                      EDUCATION DEPARTMENT**

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE**  
**TO THE REPLY SUBMITTED BY THE RESPONDENT NO.1**  
**TO 3**

**R/SHEWETH:**

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- 4- Incorrect and misconceived. That the impugned transfer order dated 17/10/2014 was issued on the direction of Local MPA namely Mr. Jamshed Khan. That the said impugned order was in total violation of transfer/posting policy. Moreover the said impugned order dated 17.10.2014 and has not been passed/issued by the respondents in the public interest nor exigencies of public service.
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**GROUND:**  
**(A TO G):**

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent No.1-3 are incorrect and baseless. That the impugned transfer order dated 17/10/2014 was issued by the respondents on the directions of local MPA namely Mr. Jamshed Khan. That the recommendation for transfer of the appellant was made by the said MPA on the reason that the said MPA wants to posted his nears and dears on his own sweet well That inspite of asserting undue influence on the appellant by the concerned MPA, the appellant did not surrender herself i.e. by not obeying the illegal orders of the said MPA. That due to the above mentioned reason the respondents instead of encouraging the appellant for her brave and legal stance transferred the appellant from the post of SDO (F) Takht Bhai to SDO (F) Batkhela vide impugned order dated 17/10/2-14. That the impugned order dated 17-10-2014 is against the law, facts , norms natural justice and material on record hence not tenable and liable to be set aside. That the impugned order dated 17-10-2014 is against the clause I, II and IX of the transfer/posting policy of the government of Khyber Pakhtunkhwa. Moreover appellant is an unmarried female and her parents are residing at District Mardan, therefore the appellant is entitled to be retained at District Mardan under the policy and regulation there under.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may please be accepted as prayed for.

Dated:6.5.2015

**APPELLANT**



**ABIDA PARVEEN**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1478 /ST

Dated 28 / 9 / 2015

To

The Secretary,  
E&SE,  
Peshawar.

Subject: - Judgement

I am directed to forward herewith certified copy of Judgement dated 17.9.2015 passed by this Tribunal on subject for strict compliance.

Encl: As above



REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.