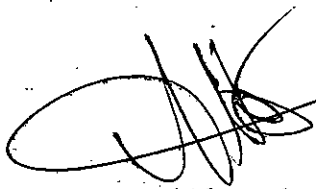


09.04.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Vide separate common judgment of today of this Tribunal placed on file of service appeal No.293/2016 filed by Zubair Khan, the impugned order is set aside. Respondent department is directed to reinstate the appellant, for the purpose of inquiry, without back benefits. Respondent department to conduct proper inquiry against the appellant and conclude the same in accordance with law & rules on the subject. The present service appeal is partially accepted in the above terms. Parties are left to bear their own costs. File be consigned to the record room.



(Ahmad Hassan)  
Member



(Muhammad Hamid Mughal)  
Member

ANNOUNCED  
09.04.2019

Service Appeal No. 377/2016

23.01.2019

None present on behalf of the appellant. Mr. Kabirullah Khattak, Additional AG for the respondents present. Notice be issued to appellant and his counsel for attendance as well as arguments for 29.03.2019 before

D.B.

  
(HUSSAIN SHAH)  
MEMBER

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

29.03.2019

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 08.04.2019 before D.B.


  
(HUSSAIN SHAH)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

08.04.2019

Appellant with counsel present. Mr. Ziaullah, DDA alongwith Mr. Daud Jan, Supdt for respondents present. Learned counsel for the appellant seeks adjournment as he has not prepared the case. Adjourned. Case to come up for arguments on tomorrow i.e. 09.04.2019 before D.B.

(Ahmad Hassan)  
Member

  
(M. Hamid Mughal)  
Member

29.06.2018

Appellant absent. Learned counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Daud Jan, Superintendent for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 17.08.2018 before D.B.

  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

17.08.2018


Appellant in person and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Appellant seeks adjournment as his counsel is not available. Adjourned. To come up for arguments on 15.10.2018 before D.B.


  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

03.12.2018

Junior counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 23.01.2019 before D.B.

  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

08.05.2018 The Tribunal is defunct due to retirement of Hon'ble Chairman.  
Therefore, the case is adjourned. To come on 28.06.2018


  
READER

28.05.2018 Bench is incomplete. To come up for order on  
31.05.2018 before D.B

  
Member


31.05.2018 Learned Additional Advocate General  
present. Some points needs consideration. Learned  
counsel for the appellant is not available. Adjourned. To  
come up for further arguments on 07.06.2018 before  
D.B


  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

07.06.2018

Junior to counsel for the appellant and Mr. Kabir Ullah  
Khattak learned Advocate General alongwith Daud Jan  
ADO for the respondents present. Junior to counsel for the appellant  
seeks adjournment as senior counsel is not in attendance. Adjourned.  
To come up for arguments on 29.06.2018 for arguments before D.B.

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

04.04.2018

Counsel for the appellant and Addl; AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 10.04.2018 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Hamid Mughal)  
Member

10.04.2018

Counsel for the appellant and Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment. Last opportunity granted. To come up for record and arguments on 23.04.2018 before the D.B.


  
Member

  
Chairman

23.04.2018


Learned counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General alongwith Ahmad Khan AEO for the respondents present. Arguments heard. To come up for order on 05.05.2018 before D.B

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

29.11.2017


Counsel for the appellant Mr. Ziaullah, DDA alongwith Mr. Daud Jan, Supdt for the respondents present. Representative of the respondents is directed to bring enquiry report and other documents. To come up for such record and arguments on 08.02.2018 before the D.B.

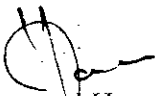
  
Member

  
Chairman

08.02.2018

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Addl: AG for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 29.03.2018 before D.B.

  
(Gul Zeb Khan)  
Member

  
(Muhammad Hamid Mughal)  
Member

29.03.2018

Counsel for the appellant (Mr. Khushdil Khan, Advocate) present and Wakalatnama submitted. Addl. AG alongwith Daud Jan, Supdt. for the respondents present. Learned AAG seeks adjournment due to transfer of Mr. Ziaullah, DDA. Adjourned. To come up for record and arguments on 04.04.2018 before D.B.


  
Member

  
Chairman

20.02.2017


Counsel for the appellant and Daud Jan, Supdt. alongwith Mr. Muhammad Jan, GP for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 21.06.2017 before D.B.

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

  
(AHMAD HASSAN)  
MEMBER

21.06.2017

Appellant in person present. Mr. Kabir Ullah Khattak, Assistant AG for the respondents present. Appellant requested for adjournment. Adjourned. To come up for arguments on 03.10.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

  
(Gul Zeb Khan)  
Member

03.10.2017

Counsel for the appellant and Asst: AG for respondents present. Learned counsel for the appellant stated that similar nature of appeals are fixed on 29.11.2017, therefore the same may also be clubbed with the said appeals. Requested accepted. To come up for arguments on 29.11.2017 alongwith connected appeals before D.B.

  
(MUHAMMAD HAMID MUGHAL)  
MEMBER

  
(AHMAD HASSAN)  
MEMBER

08.08.2016

Counsel for the appellant and Mr. Daud Jan, Superintendent alongwith Additional AG for respondents present. Written reply on behalf of respondents not submitted and requested for adjournment. Request accepted. To come up for written reply/comments on 26.10.2016 before S.B.

  
Member


26.10.2016

Clerk to counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Assistant AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 27.12.2016 before S.B.

  
Chairman

27.12.2016

Counsel for the appellant and Mr. Daud Jan, Supdt alongwith Asst. AG for respondents present. Written reply on behalf of respondents No.1 and 2 submitted. None present on behalf of respondent No.3, hence proceeded ex-parte. The appeal is assigned to D.B for rejoinder and final hearing on 20.02.2017.

  
Chairman



13.4.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Junior Clerk when subjected to enquiry on the allegations of irregularities in his appointment and vide impugned order dated 11.12.2015 his services were terminated where against he preferred departmental appeal on 21.12.2015 which was not responded and hence the instant service appeal on 07.4.2016.

That neither any regular enquiry was conducted nor opportunity of hearing was extended to the appellant and the enquiry conducted is defective in nature.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.05.2016 before S.B.

21.4.21

21.4.11

Chairman

26.05.2016

Counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl. AG for the respondents present. Requested for adjournment. To come up for written reply/comments on 08.08.2016 before S.B.



Chairman

Appellant Deposited  
Security & Process Fee

Form- A  
FORM OF ORDER SHEET

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

Case No. 377/2016

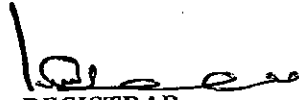
| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1     | 07.04.2016                | <p>The appeal of Mr. Muhammad Alam Khan resubmitted today by Mr. Irfanullah Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR</p> |
| 2     | 11.4.16                   | <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>13.4.16</u>.</p> <p style="text-align: right;"><br/>CHAIRMAN</p>   |

The appeal of Muhammad Alam Khan Junior Clerk GHS Makhizai Central Kurram Agency received to-day i.e. on 06.04.2016 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Copies of extract from attendance register mentioned in para-3 of the memo of appeal (Annexure-F) is not attached with the appeal which may be placed on it.

No. 545 /S.T.

Dt. 06/04 /2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Irfan Ali Yousafzai Adv. Pesh.

Resubmitted

Qali Qasim

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 377 /2016

Muhammad Alam Khan .....Appellant

**V E R S U S**

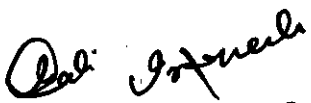
Agency Education Officer, Lower & Central Kurram Sadda and  
others.....Respondents

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| S.No | Description of Documents                                      | Annex | Pages |
|------|---|-------|-------|
| 1.   | Memo of Appeal  |       | 1-6   |
| 2.   | Affidavit   |       | 7     |
| 3.   | Addresses of the Parties                                      |       | 8     |
| 4.   | Copies of advertisement, Educational Documents and Merit list | A,B&C | 9-24  |
| 5.   | Copy of appointment order                                     | D     | 25    |
| 6.   | Copies of charge report and attendance                        | E&F   | 26-27 |
| 7.   | Copies of impugned order and inquiry report                   | G&H   | 28-33 |
| 8.   | Copies of departmental appeal & TCS receipt                   | I&J   | 34-37 |
| 9.   | Copy of stoppage of salary                                    | K     | 38    |
| 10.  | Waklat Nama   |       | 39    |

Appellant

Through



**Irfan Ali Yousafzai**  
Advocate High Court  
Cell No. 0314-9070658

Dated: 05/04/2016

**PRAYER IN APPEAL:**

*On acceptance of this appeal the impugned order No. 2987-93 Edu: dated 11/12/2015 may kindly be set aside and the appellant be reinstated in his service with all back benefits and as such any other relief which this august Court deems appropriate under the circumstances of the case may also be awarded to the appellant.*

**Respectfully Sheweth:**

1. That the appellant along with others applied for the post of Junior Clerk BPS-07 through advertisement dated 25/10/2012 having the requisite Qualification i.e Master in Political Science, after passing test and interview the appellant was declared as a successful candidate which is evident from the merit list.(Copies of advertisement, Educational Documents and Merit list are annex as annexure A,B & C)
2. That on 21/01/2013 the appellant was appointed as a Junior Clerk BPS-07 in Government High School Makhi Zai Lower Kurram Agency. (Copy of appointment order is annexure "D").

3

3. That after the appointment the appellant took over the charge on 22/01/2013 at the government high school Makhizai lower Khurram Agency and regularly performed his duties to the entire satisfaction of the high-up's with no complaint what so ever extract from the attendance <sup>certificate</sup> ~~registered~~. (Copies of charge report and attendance are annexure as "E" & "F").
4. That vide impugned order dated 11/12/2015 the service of the appellant were all of sudden terminated without associating the appellant with in inquiry proceeding or giving him opportunity to explain his position (Copies of impugned order and inquiry report are annexure "G" "H").
5. That the appellant being aggrieved of the termination order has challenge the same in departmental appeal before the appellate authority vide diary No-4761529187 dated 19/12/2015 but the same was not decided with in statutory period of 90 days. (Copies of departmental appeal & TCS receipt are annexure "I" & J).
6. That it is worth mentioning here that appellant has not received single penny for his services which he performed after his appointment to the satisfaction of his high ups. (Copy of stoppage of salary is annexure "K" )

7. That the appellant preferred departmental appeal against the said termination order and as such later on time and again the appellant approach to the concern authorities for his reinstatement and the appellant was hopeful to be reinstated but one way or the other the respondents delayed the matter and as such finally the appellant was directed by the respondents No. 1 and 2 that the appellant will be reinstated as the matter is subjudice before this august Tribunal, so the appellant waited for the commitment made by the respondents but at no avail, but with utmost surprise of the appellant his departmental appeal was not decided within stipulated period.

That being aggrieved the appellant approached this Hon'ble Tribunal on the following grounds amongst other inter alia:

**GROUND:**

A. That the termination order dated 11/12/2015 and non disposal of departmental appeal of respondents No. 2 is against facts, law and procedure, hence, untenable being unjust and unfair.

- B. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for the purpose.
- C. That neither statement of allegations was served upon the appellant Nor regular inquiry was conducted against the appellant and the whole departmental proceedings were initiated by respondents illegally and unlawfully without observing the legal codal formalities as required under the law at the back of appellant, order of appellant is not sustainable in the eyes of law and void hence liable to be set at naught.
- D. That respondent No. 1 has taken a unilateral action at the back of the appellant. The appellant has not been afforded an opportunity of being heard and thus he has been condemned unheard and thus the settled principles of natural justice have been violated.
- E. That the appellant is a regular Civil Servant and has rendered long service of three years in the department with unblemished service record and he could not be terminated without observing/ fulfilling the legal formalities and thus the action taken by the respondents/ department against the appellant is based on malafide. The appellant has been terminated from services against the rules, regulating the services and are

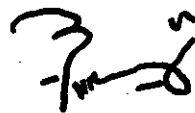


6

in violation of the established principles of equity and justice, calling for intervention by the Hon'able Tribunal.

- F. That appellant seeks leave of this Hon'able Tribunal to rely on additional grounds at the time of final hearing/arguments.
- G. That any other ground may be adduced during the course of argument, with the kind permission of this Hon'ble Court.

It is, therefore, most humbly prayed that on acceptance of this appeal the impugned order No. 2987-93 Edu: Dated 11/12/2015 may kindly be set aside and the appellant be reinstated in his service with all back benefits and as such any other relief which this august Court deems appropriate under the circumstances of the case may also be awarded to the appellant.



Appellant

Through



**IRFAN ALI YOUSAFZAI**  
Advocate High Court

Dated: 05/04/2016

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2016.

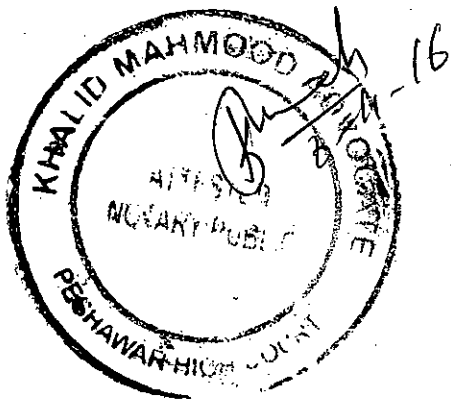
Muhammad Alam Khan.....Appellant

**V E R S U S**

*Adel* Agency Education Officer, Lower & Central Kurram Sadda and others.....Respondents

**AFFIDAVIT**

I, **IRFAN ALI YOUSAFZAI**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



*Irfan Ali Yousafzai*  
**ADVOCATE**

8

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2016

Muhammad Alam Khan .....Appellant

**V E R S U S**

Agency Education Officer, Lower & Central Kurram Sadda and others.....Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Muhammad Alam Khan, (Junior Clerk) Government High School Makhizai Central Khurram Agency.

**RESPONDENTS:**

- Add -*
1. Agency Education Officer, Lower & Central Kurram Sadda.
  2. Director of Education, FATA, Khyber Pakhtunkhwa, FATA Civil Secretariat, WARSAK Road, Peshawar.
  3. Political Agent, Kurram Parachinar.

Appellant

Through

*Irfan Ali Yousafzai*  
**Irfan Ali Yousafzai**  
 Advocate, Peshawar.

Dated: 05/04/2016



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Amza "B" 10

S.No. KB 216860

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 66631

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



**KOHAT**

**(N.W.F.P. Pakistan)**

**Secondary School Certificate Examination**

**Session: 2005 (ANNUAL)**

This is to Certify that MUHAMMAD ALAM KHAN  
 Son/Daughter of SALAM KHAN and a  
 student of SIR SYED PUBLIC HIGH SCHOOL ALIZAI KURRAM AGENCY  
 has passed the *Secondary School Certificate Examination* of the Board of  
 Intermediate and Secondary Education, Kohat held in MARCH, 2005 as a  
REGULAR candidate. He/She obtained 776 Marks out of 1050 and  
 has been placed in Grade A Representing EXCELLENT

The Candidate passed in the following subjects:

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

Date of birth according to admission form is 05-Mar-1989

*[Signature]*  
 Asstt. Secretary

*[Signature]*  
 HEAD MASTER  
 G.H.S Nahaqi  
 Mohmand Agency

*[Signature]*  
 Secretary

*This certificate is issued without alteration or Erasure*

**ATTESTED**  
*[Signature]*

S.No. KB \_\_\_\_\_

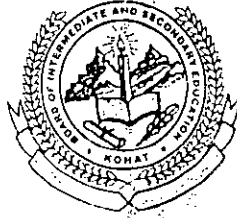
4354J

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 30521

(11)

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



## KOHAT

(N.W.F.P. Pakistan)

### INTERMEDIATE EXAMINATION

#### PRE-MEDICAL GROUP

#### Session 2007 (Annual)

This is to Certify that Muhammad Alam Khan

Son/Daughter of Salam Khan

and a student of Govt Degree College Bagan Kurram Agency

Registered No 003-BK/GDCBKA-2005 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Kohat held in May, 2007 as a Regular candidate. He/She obtained 631 marks out of 1100 and has been placed in C Grade Representing Good.

The Examination was taken as a whole / in parts.

*[Signature]*  
Asstt. Secretary

*[Signature]*

*[Signature]*  
Secretary

This certificate is issued without alteration or erasure.

MUHAMMAD ANWAR  
(ORAKZAI)  
Lecturer in Pashto  
GDC BAGGAN KA

*[Signature]*  
**ATTESTED**

Serial No. 002629

Roll No. 14576

Registration No. 2007- GC3



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# Kohat University of Science & Technology, Kohat (Pakistan)

12

Session 2007-2009

MUHAMMAD ALAM KHAN son of SALAM KHAN and a student of GOVT DEGREE COLLEGE BAGAN KURBAN AGENCY having passed the prescribed examination held in JULY 2009, is this day admitted

The Kohat University of Science & Technology, Kohat  
to the Degree of  
**Bachelor of Arts**

in the FIRST Division

*M. S. Nohani*

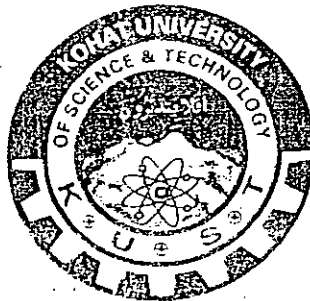
HEAD MASTER,  
G.H.S Nohani,  
Mohmand Agency

The Examination was taken as a whole / in parts

**ATTESTED**

OCTOBER 24, 2009

Result declared on

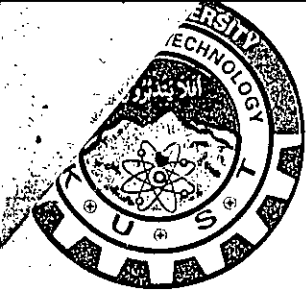


*Muhammad Anwar*  
MUHAMMAD ANWAR  
LORANZAD  
Lecturer In Pashto  
GDC BAGGAN KA

*[Signature]*  
Controller of Examinations

Countersigned

*[Signature]*  
Vice Chancellor



# Kohat University

of Science & Technology, Kohat (Pakistan)

13

## DETAILED MARKS CERTIFICATE

Bachelor of Arts (B.A) Part I Annual  
Examination, 2008

Name: Muhammad Alam Khan

Roll No. 5716

Father's Name: Salam Khan

Registration No. 2007-GCB-20

Certified that the subjects offered and marks obtained by the candidate are as under.

| S U B J E C T S      | Maximum Marks | M A R K S O B T A I N E D |             |
|----------------------|---------------|---------------------------|-------------|
|                      |               | In Figure                 | In Words    |
| English Compulsory   | 75            | 51                        | Fifty One   |
| Islamic Studies      | 75            | 54                        | Fifty Four  |
| Political Science    | 75            | 50                        | Fifty       |
| Islamiyat Compulsory | 60            | 45                        | Forty Five  |
| Total                | 285           | 200                       | Two Hundred |

The examination was taken as a whole

To Pass 40% Marks in each Subject (Written & Practical Separately) & 45% Marks in Aggregate.

Result declared on 20-Oct-08

Tahr

Errors and omissions are subject to subsequent rectification.

*[Handwritten signature]*

CONTROLLER OF EXAMINATIONS  
Kohat University of Science and Technology  
Kohat, Pakistan.

*Attested by*

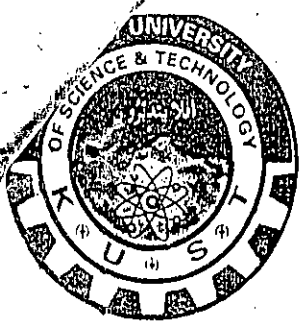
*[Handwritten signature]*

MUHAMMAD ANWAR  
(ORAKZAI)  
In-charge in Pakistan  
GDC BAGGAN KA

*[Handwritten signature]*

ATTESTED





Serial No. 050442

# Kohat University

of Science & Technology, Kohat (Pakistan)

19

## DETAILED MARKS CERTIFICATE

Bachelor of Arts (B.A) Part II Annual  
Examination, 2009

Name: Muhammad Aiam KhanRoll No. 14576Father's Name: Salam KhanRegistration No. 2007-GCB-20

Certified that the candidate secured the following marks and is placed in 1st Division

| S U B J E C T S     | Maximum<br>Marks | M A R K S O B T A I N E D |                          |
|---------------------|------------------|---------------------------|--------------------------|
|                     |                  | In Figure                 | In Words                 |
| English Compulsory  | 75               | 31                        | Thirty One               |
| Islamic Studies     | 75               | 49                        | Forty Nine               |
| Political Science   | 75               | 55                        | Fifty Five               |
| Pak Studies         | 40               | 24                        | Twenty Four              |
| <i>Part-I Marks</i> | 285              | 200                       | Two Hundred              |
| Total               | 550              | 359                       | Three Hundred Fifty Nine |

The examination was taken as a whole

To Pass 40% Marks in each Subject (Written & Practical Separately) & 45% Marks in Aggregate.

Result declared on 24-Oct-09

Tahr

Errors and omissions are subject to subsequent rectification

*[Signature]*  
**HEAD MASTER**  
G.H.S Nahani  
Mohmand Agency

*[Signature]*  
**CONTROLLER OF EXAMINATIONS**  
Kohat University of Science and Technology  
Kohat, Pakistan.

*[Signature]*  
**MUHAMMAD ANWAR**  
(ORANZAN)  
Lecturer in Pashto  
GDC BAGGAN KA

*[Signature]*  
**ATTESTED**

# University of Peshawar

15

Pakistan

Session: Annual 2011

MUHAMMAD ALAM KHAN

son of

SALAM KHAN

and a

Student Of Department of Political Science, University of Peshawar having Passed the

prescribed examination held in July 2011 is this day admitted by the University Of Peshawar to

the Degree of Master of Arts in Political Science in 1st Division

The examination was taken as a whole

Registration No. 2009-U-6279

Roll No. 7598

C.M.C.A. 21302-7710345-1

Result Declared on January 14, 2012

**ATTESTED**



067104

MUHAMMAD ANWAR  
(ORAKZAI)  
Lecturer in Pashto  
GDC BAGGAN K

HEAD MASTER  
G.H.S Nahagi  
Mohmand Agency

m. Asadullah  
Vice Chancellor

16

No. 027684

# University of Peshawar



## Pakistan Detailed Marks Certificate

Master of Arts in Political Science

Previous

Annual Examination 2010

Department of Political Science, University of Peshawar



Regular

Name: MUHAMMAD ALAM KHAN

Gender: Male

Roll No. 3052

Father's Name: SALAM KHAN

Registration No: 2009-U-6889

| Papers   | Max Marks | Marks Obtained |                         |
|--|-----------|----------------|-------------------------|
|  |           | In Figures     | In Words                |
| Government & Politics in Pakistan-I                | 100       | 52             | Fifty Two               |
| Political System-II                                | 100       | 55             | Fifty Five              |
| Political Philosophy-III                           | 100       | 62             | Sixty Two               |
| History & Principles of International Relations-IV | 100       | 66             | Sixty Six               |
| Principles of Public Administration-V              | 100       | 68             | Sixty Eight             |
|  | 500       | 303            | Three Hundred and Three |

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 14-Jul-2010 to 19-Aug-2010

Result Declared on Thursday February 24, 2011

Issue Date: 25-Feb-2011

4.44 pm

Computerized by RTC

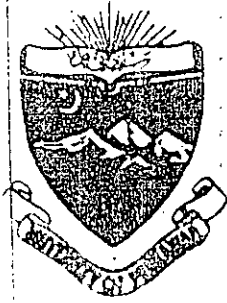
(Dr. Mohammad Shafi)

ADDITIONAL CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

**ATTESTED**  
MUSHAHID ANWAR  
Lecturer in Political Science  
CDC BAGGAN

0016033

# University of Peshawar



## Pakistan Detailed Marks Certificate

Master of Arts in Political Science

Final

Annual Examination 2011

Department of Political Science, University of Peshawar



Regular

Name: MUHAMMAD ALAM KHAN

Gender: Male Roll No: 7598

Father's Name: SALAM KHAN

Registration No: 2009-U-6889

Division: 1st

| Papers   | Max Marks | Marks Obtained |                            |
|--|-----------|----------------|----------------------------|
|  |           | In Figures     | In Words                   |
| Political Development Social Change & Research Methodology-VI(P-Old) | 100       | 73             | Seventy Three              |
| Muslim World & its Political Dynamics-VII(Old-P)                     | 100       | 76             | Seventy Six                |
| Political & Institutional Development in Pakistan-VIII(B)            | 100       | 58             | Fifty Eight                |
| Economy of Pakistan-IX(B)  | 100       | 61             | Sixty One                  |
| Pakistan in World Affairs-X(B)                                       | 100       | 63             | Sixty Three                |
| Viva Voce  | 100       | 85             | Eighty Five                |
| Previous 3052:Annual-2010  | 500       | 303            | Three Hundred and Three    |
| Final  | 1100      | 719            | Seven Hundred and Nineteen |

Errors & omissions are subject to subsequent rectification.

Chances Available: 1

The Examination was taken As a Whole

Examination held From 14-Jul-2011 to 04-Aug-2011

Result Declared on Saturday, January 14, 2012

**ATTESTED**

MUHAMMAD ANWAR  
(ORAKZAI)  
Lecturer in Political Science  
CDC BAGGAN KA

*(Signature)*

(Iftekhar Hussain Khan)


18



DEPARTMENT OF POLITICAL SCIENCE  
UNIVERSITY OF PESHAWAR  
PESHAWAR - PAKISTAN

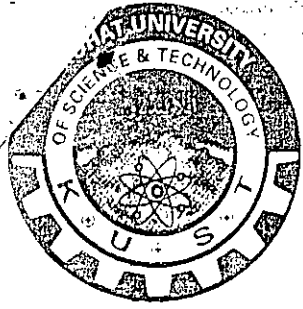
CHARACTER CERTIFICATE

This is to certify that Mr. / Miss MOHAMMAD ALAM KHAN  
Son / Daughter of SALAM KHAN  
was a regular student of this Department during the academic Session 2010-11  
His/Her character and conduct during stay in this Department remained GOOD

  
**CHAIRMAN**  
Chairman  
Department Of Political Science  
University Of Peshawar  
Dated: 17.1.2012

  
**HEAD MASTER**  
G.H.S Nanaudi  
Mohmand Agency

  
**ATTESTED**



Serial No: 200335

# Kohat University

of Science & Technology, Kohat (Pakistan)

19

## DETAILED MARKS CERTIFICATE

Master of Arts (International Relations)  
Previous Annual Examination, 2012

Name: Muhammad Alam Khan  
Father's Name: Salam Khan

Roll No. 1675  
Registration No. 2007-GCB-20

Certified that the subjects offered and marks obtained by the candidate are as under.

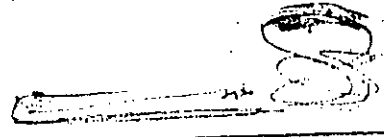
| S U B J E C T S                                 | Maximum Marks | M A R K S O B T A I N E D |                          |
|---|---------------|---------------------------|--------------------------|
|   |               | In Figure                 | In Words                 |
| History of International Relations - (I)        | 100           | 54                        | Fifty Four               |
| Basic Factors in International Relations - (II) | 100           | 40                        | Forty                    |
| Foreign Policy Analysis - (III)                 | 100           | 81                        | Eighty One               |
| Pakistan in World Affairs - (IV)                | 100           | 42                        | Forty Two                |
| International and Regional Organizations - (V)  | 100           | 62                        | Sixty Two                |
| Total   | 500           | 279                       | Two Hundred Seventy Nine |


The examination was taken as a whole

Result declared on 11-Jan-13

Tahir

Errors and omissions are subject to subsequent rectification.

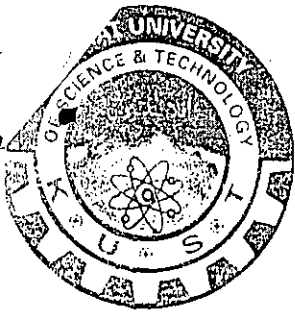
  
CONTROLLER OF EXAMINATIONS  
Kohat University of Science and Technology  
Kohat, Pakistan.

  
MUHAMMAD ANWAR  
GORAKZAD  
Faculty in Public  
GCB BAGGAN KA

  
ATTESTED

26

Serial No. 226345



# Kohat University of Science & Technology, Kohat (Pakistan)

## DETAILED MARKS CERTIFICATE

Master of Arts (International Relations) Final  
Annual Examination, 2013

Name: Muhammad Alam Khan

Roll No. 11774

Father's Name: Salam Khan

Registration No. 2007-GCB-20

Certified that the candidate secured the following marks and is placed in 1st Division

| S U B J E C T S                                       | Maximum Marks | M A R K S O B T A I N E D |                          |
|---|---------------|---------------------------|--------------------------|
|   |               | In Figure                 | In Words                 |
| Public and International Law - (VI)                   | 100           | 62                        | Sixty Two                |
| Politics of International Economics Relations - (VII) | 100           | 72                        | Seventy Two              |
| Strategic Studies - (VIII)                            | 100           | 62                        | Sixty Two                |
| Foreign Policy of Neighbouring Countries - (IX)       | 100           | 78                        | Seventy Eight            |
| International Politics of Middle East - (X)           | 100           | 47                        | Forty Seven              |
| Viva  | 100           | 64                        | Sixty Four               |
| Previous Marks:                                       | 500           | 279                       | Two Hundred Seventy Nine |
| Total   | 1100          | 664                       | Six Hundred Sixty Four   |

The examination was taken as a whole

Result declared on 31-Dec-13

Tahr

HEAD MASTER  
G.H.S Nahaqi  
Mohmand Agency

CONTROLLER OF EXAMINATIONS  
Kohat University of Science and Technology  
Kohat, Pakistan.

Errors and omissions are subject to subsequent rectification.

MUHAMMAD ANWAR  
(ORAKZAI)  
Lecturer in Persian  
CDC BAGGAN KA

ATTESTED

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. A-20532

## PROVISIONAL RESULT CARD

21

Name MUHAMMAD ALAM KHAN  
 Father's Name SALAM KHAN  
 Address

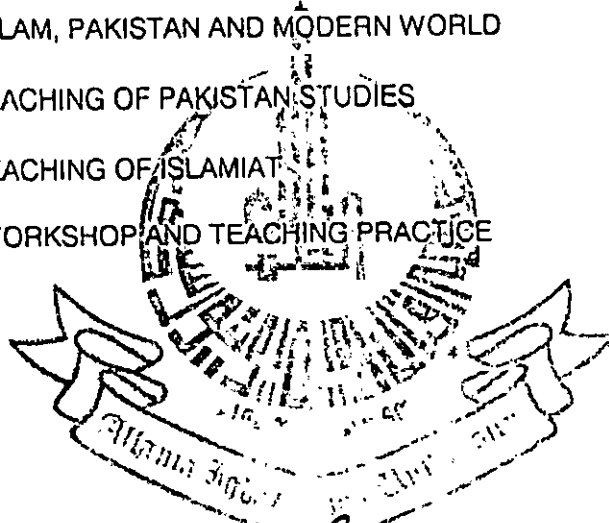
Roll No. AV639743  
 Registration No. 13AKM00626  
 Final Semester SPRING 2014

Tehsil PESHAWAR  
 District PESHAWAR

has successfully completed **BACHELOR OF EDUCATION (B.ED)**

The detail of passed courses is as under:

| Semester    | Course Code | Title of Course                   | Marks   |          |
|-------------|-------------|-----------------------------------|---------|----------|
|             |             |                                   | Maximum | Obtained |
| AUTUMN 2013 | 512         | PERSPECTIVES OF EDUCATION         | 100     | 68       |
| AUTUMN 2013 | 513         | SCHOOL ORGANIZATION               | 100     | 62       |
| AUTUMN 2013 | 514         | EVALUATION, GUIDANCE AND RESEARCH | 100     | 68       |
| AUTUMN 2013 | 518         | EDUCATIONAL PSYCHOLOGY            | 100     | 64       |
| AUTUMN 2013 | 651         | ENGLISH                           | 100     | 73       |
| AUTUMN 2013 | 652         | ISLAM, PAKISTAN AND MODERN WORLD  | 100     | 67       |
| SPRING 2014 | 517         | TEACHING OF PAKISTAN STUDIES      | 100     | 66       |
| SPRING 2014 | 654         | TEACHING OF ISLAMIAT              | 100     | 70       |
| SPRING 2014 | 655         | WORKSHOP AND TEACHING PRACTICE    | 100     | 46       |



HEAD MASTER  
 G.H.S Nainaqi  
 Mohmand Agency

Credits: 6

Total Marks / Obtained

900 / 584

Result Declared on January 16, 2015

Percentage / Grade

Date of issue March 08, 2016

ATTESTED

65 / B

Controller of Examinations

**Disclaimer:**

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the



| Sl. No. | Name                      | F/Name               | Date of Birth | Sex | E/O | SSC/BA | Academic Qualification |       |      |      |      |      |      |      |       |      | C. Total | Remarks |
|---------|---------------------------|----------------------|---------------|-----|-----|--------|------------------------|-------|------|------|------|------|------|------|-------|------|----------|---------|
|         |                           |                      |               |     |     |        | SSC                    | SSC   | SSC  | SSC  | SSC  | SSC  | SSC  | SSC  | SSC   | SSC  |          |         |
| 1       | Kashid Khan               | Khashid Khan         | 1988          | CR  |     |        | 595                    | 590   | 744  | 1100 | 330  | 755  | 323  | 4    | 69.62 | Pass |          |         |
| 2       | Sufur Baham Khan Chamhani | Haji Amir Maje Gul   | 1966          | CR  |     |        | 17579                  | 16509 | 721  | 1100 | 141  | 141  | 2    | 2    | 69.43 | Pass |          |         |
| 3       | Sufur Baham Khan          | Haji Haider Khan     | 1936          | CR  |     |        | 17791                  | 15335 | 653  | 1100 | 2716 | 400  | 2716 | 400  | 65.26 | Pass |          |         |
| 4       | Sufur Baham Khan          | Sufur Baham Khan     | 1985          | CR  |     |        | 5235                   | 5550  | 555  | 1100 | 379  | 555  | 787  | 1200 | 62.00 | Pass |          |         |
| 5       | Sufur Baham Khan          | Wali Khan            | 1938          | CR  |     |        | 590                    | 1050  | 787  | 1100 | 335  | 550  | 570  | 1100 | 60.12 | Pass |          |         |
| 6       | Sufur Baham Khan          | Abulhasan Sufur Khan | 1944          | CR  |     |        | 574                    | 550   | 733  | 1100 | 279  | 550  | 1166 | 1525 | 59.36 | Pass |          |         |
| 7       | Sufur Baham Khan          | Haji Haider Gul      | 1965          | CR  |     |        | 481                    | 350   | 758  | 1000 | 758  | 1000 | 758  | 1000 | 56.68 | Pass |          |         |
| 8       | Sufur Baham Khan          | Abdul Haq Gul        | 1973          | CR  |     |        | 12294                  | 16176 | 1400 | 1700 | 523  | 1100 | 523  | 1100 | 65.81 | Pass |          |         |
| 9       | Sufur Baham Khan          | Amir Khan            | 1981          | CR  |     |        | 374                    | 550   | 635  | 1100 | 267  | 550  | 1204 | 1800 | 54.31 | Pass |          |         |
| 10      | Sufur Baham Khan          | Abdul Wahab          | 1993          | CR  |     |        | 455                    | 550   | 627  | 1100 | 276  | 550  | 555  | 1100 | 54.04 | Pass |          |         |
| 11      | Sufur Baham Khan          | Wahid Khan           | 1992          | CR  |     |        | 573                    | 570   | 643  | 1100 | 552  | 550  | 552  | 1100 | 53.51 | Pass |          |         |
| 12      | Sufur Baham Khan          | Khashid Khan         | 1993          | CR  |     |        | 550                    | 550   | 512  | 1100 | 550  | 550  | 550  | 1100 | 52.51 | Pass |          |         |
| 13      | Sufur Baham Khan          | Sufur Baham Khan     | 1992          | CR  |     |        | 550                    | 550   | 758  | 1100 | 550  | 550  | 550  | 1100 | 52.27 | Pass |          |         |
| 14      | Sufur Baham Khan          | Sufur Baham Khan     | 1991          | CR  |     |        | 550                    | 550   | 488  | 1100 | 550  | 550  | 550  | 1100 | 50.04 | Pass |          |         |

ATTESTED

(Signature)

(Signature)

22

| S#      | Name                         | F/Name               | Domic<br>al | D/O<br>Birth | Age/on | Academic Qualification |                       |                       |                     | G.Total | Remarks |
|---------|------------------------------|----------------------|-------------|--------------|--------|------------------------|-----------------------|-----------------------|---------------------|---------|---------|
|         |                              |                      |             |              |        | SSC<br>SC              | FSc/FA<br>SC          | BSc/BA<br>SC          | MSc/MA<br>SC        |         |         |
| 1       | Rashid Khan                  | Khadi Khan           | CK          | 1986         | 26     | 595 / 850<br>17.529    | 744 / 1100<br>16.909  | 330 / 550<br>15       | 3.23/4<br>20.188    | 69.63   |         |
| 2       | Abdur Rahim Khan<br>Chamkani | Haji mir mat Gul     | do          | 1988         | 24     | 605 / 850<br>17.794    | 721 / 1100<br>16.385  | 1.41 / 2<br>17.625    | 1.41/2<br>17.625    | 69.43   |         |
| 3       | Sajid Rehman                 | Haji Haider<br>Khan  | do          | 1988         | 24     | 686 / 1050<br>16.333   | 659 / 1100<br>14.977  | 2716 / 4000<br>15.975 | 2716/4000<br>16.975 | 65.26   |         |
| 4       | Sajid Rehman                 | Syed Aslam<br>Khan   | do          | 1985         | 27     | 518 / 850<br>15.235    | 566 / 1100<br>12.854  | 1362/2000<br>17.025   | 2.7/4<br>16.875     | 62.00   |         |
| 5       |                              | Gulzam               | do          | 1985         | 27     | 527 / 850<br>15.5      | 559 / 1100<br>12.705  | 379 / 550<br>17.227   | 781/1200<br>16.398  | 81.83   |         |
| 6       | Ashiq Ahmad                  | Wali khan            | do          | 1989         | 23     | 590 / 1050<br>14.048   | 787 / 1100<br>17.886  | 335 / 550<br>15.227   | 570/1100<br>12.955  | 60.12   |         |
| 7       | Shraz Khan                   | Maulana syed<br>khan | Do          | 1984         | 28     | 500 / 850<br>14.706    | 703 / 1100<br>15.977  | 279 / 550<br>12.682   | 1165/1825<br>15.973 | 59.34   |         |
| 8       | Umar gul                     | Haji Hazrat Gul      | do          | 1985         | 27     | 451 / 850<br>13.255    | 735 / 1400<br>13.125  | 759 / 1400<br>13.732  | 2.65/4<br>16.563    | 56.68   |         |
| 33<br>9 | Muhammad Ibrahim             | Abdul Hammed         | do          | 1979         | 33     | 418 / 850<br>12.294    | 1100 / 1700<br>16.176 | 625/1100<br>14.205    | 289/550<br>13.136   | 55.81   |         |
| 10      | .....                        | Ayub Khan            | do          | 1984         | 23     | 374 / 850<br>11        | 636 / 1100<br>14.455  | 267/550<br>12.136     | 1204/1800<br>16.722 | 54.31   |         |
| 11      | Amin Gul                     | Abdullah khan        | do          | 1983         | 24     | 455 / 850<br>13.676    | 627 / 1100<br>14.25   | 278/550<br>12.535     | 595/1100<br>13.523  | 54.09   |         |
| 12      | Siraj ud din                 | Walayat khan         | Do          | 1992         | 20     | 573 / 850<br>13.334    | 843 / 1100<br>19.159  | 353/550<br>18.245     | 0/0<br>0            | 52.54   |         |
| 13      | Muhammad Shakil              | Khandi khan          | Do          | 1989         | 23     | 533 / 850<br>15.333    | 813 / 1100<br>18.477  | 390/550<br>17.727     | 0/0<br>0            |         |         |
| 14      | Shaheed khan                 | Fazal manor          | Do          | 1992         | 20     | 684 / 900<br>19        | 766 / 110<br>17.409   | 349/550<br>15.854     | 0/0<br>0            | 52.27   |         |
| 15      | Sher Rehman                  | Gulab Khan           | Do          | 1981         | 31     | 365 / 850<br>10.755    | 489 / 1100<br>11.114  | 295/550<br>13.409     | 549/1100<br>14.75   | 50.04   |         |

ATTESTED

| Sl. No. | Student Name    | Roll No. | Grade | Exam Name      | Grade | Exam Name      | Grade | Total Score | Remarks |
|---------|-----------------|----------|-------|----------------|-------|----------------|-------|-------------|---------|
| 18      | Sami Ullah      | 48.88    | A     | Ihsan Ud Din   | 48.88 | Ihsan Ud Din   | 48.88 | 48.88       | A       |
| 19      | Shabbir Khan    | 47.33    | A     | Adem Jan       | 47.33 | Adem Jan       | 47.33 | 47.33       | A       |
| 20      | Muhammad Sharif | 46.79    | A     | Yasir Khan     | 46.79 | Yasir Khan     | 46.79 | 46.79       | A       |
| 21      | Gulzar Khan     | 45.67    | NIL   | Muhammad Jahan | 45.67 | Muhammad Jahan | 45.67 | 45.67       | NIL     |
| 22      | Taj Muhammad    | 45.37    | A     | Gulzar Khan    | 45.37 | Gulzar Khan    | 45.37 | 45.37       | A       |
| 23      | Farooq Khan     | 45.34    | A     | Muhammad Shah  | 45.34 | Muhammad Shah  | 45.34 | 45.34       | A       |
| 24      | Rehman Ullah    | 45.15    | A     | Muhammad Shah  | 45.15 | Muhammad Shah  | 45.15 | 45.15       | A       |
| 25      | Anwar Shah      | 44.98    | A     | Muhammad Shah  | 44.98 | Muhammad Shah  | 44.98 | 44.98       | A       |
| 26      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 27      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 28      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 29      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 30      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 31      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 32      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 33      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 34      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 35      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 36      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 37      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 38      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 39      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 40      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 41      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 42      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 43      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 44      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 45      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 46      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 47      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 48      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 49      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 50      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 51      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 52      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 53      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 54      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 55      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 56      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 57      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 58      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 59      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 60      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 61      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 62      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 63      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 64      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 65      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 66      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 67      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 68      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 69      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 70      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 71      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 72      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 73      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 74      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 75      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 76      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 77      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 78      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 79      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |
| 80      | Muhammad Ullah  | 43.81    | A     | Abdul Khan     | 43.81 | Abdul Khan     | 43.81 | 43.81       | A       |

ATTESTED

23

| S# | Name             | F/Name             | Total score | Remarks | S# | Name               | F/Name           | Total Score | Remarks  |
|----|------------------|--------------------|-------------|---------|----|--------------------|------------------|-------------|----------|
| 16 | Muhammad Jamil   | Itbar Khan         | 50.03       |         | 55 | Ikran ud din       | Walaat khan      | 36.84       | A        |
| 17 | Shams ur Rehman  | Fazal Rehman       | 48.88       |         | 56 | Amjad khan         | Aslam khan       | 36.63       | A        |
| 18 | Sami Ullah       | Ihsan Ud Din       | 48.85       |         | 57 | Javed Rehman       | Khaista khan     | 35.53       | Type nil |
| 19 | Shabir Khan      | Aslam Jan          | 47.33       |         | 58 | Muhammad sher khan | Salim khan       | 35.25       | A        |
| 20 | Muhammad Sharif  | Moien shah         | 46.79       |         | 59 | Sami khan          | Nazir khan       | 35.15       | A        |
| 21 | Gul Halim        | Halim khan         | 46.67       |         | 60 | Abdul raziq        | Habib shah       | 34.9        | A        |
| 22 | Taj Muhmmad      | Muhammad Janan     | 46.37       |         | 61 |                    | Akhbar jan       | 34.87       | A        |
| 23 | Feroz khan       | Gul zam khan       | 45.43       |         | 62 | Yousaf khan        | Lal bad shah     | 34.75       | A        |
| 24 | Rehmat Ullah     | Ahmad shah         | 45.34       |         | 63 | Muslim bad shah    | Izat shah        | 34.75       | A        |
| 25 | Anwar shah       | Muhammad shah      | 45.15       |         | 64 | Imran khan         | Rehman khan      | 34.72       | A        |
| 26 | Mujeeb ur rehman | Mira jan           | 44.94       |         | 65 | Dawar khan         | Hibat khan       | 34.27       | A        |
| 27 | Noor mar shah    | Ali mar shah       | 44.68       |         | 66 |                    | Walayat khan     | 34.27       | A        |
| 28 | Muhammad tahir   | Malok              | 41.14       |         | 67 | Shah               | Hikmat shah      | 33.32       | A        |
| 29 | Muhammad nawaz   | Din khan           | 43.98       |         | 68 | Muhammad rahim     | Noor Muhammad    | 33.11       | A        |
| 30 | Abdul wahid      | Abdullah khan      | 43.81       |         | 69 | Jan                | Sarwar jan       | 32.99       | A        |
| 31 | Anwar zeb        | Abdul janan        | 43.8        |         | 70 | Rahim gul          | Noor gul         | 32.7        | A        |
| 32 | Muhib Ullah      | Sharif khan        | 43.49       |         | 71 |                    | Fazal manna      | 32.27       | Nil      |
| 33 | Zian khan        | Ajab khan          | 43.04       |         | 72 | Muhammad khan      | Momin khan       | 31.69       | A        |
| 34 | Muhammad ishaq   | Bismillah jan      | 42.97       |         | 73 |                    | Mewa jan         | 31.64       | A        |
| 35 | Abdul qayum      | Khadi khan         | 42.48       |         | 74 | Gohar malik        | Abdul malik      | 31.11       | A        |
| 36 | Shafiq rehman    | Haji nandar khan   | 42.12       |         | 75 | Sher zaman         |                  | 30.74       | Nil      |
| 37 | Ghairaz gul      | Hamid gul          | 41.88       |         | 76 | Kabir khan         | Mafta khan       | 30.64       | A        |
| 38 | Luqman khan      | Gul bad khan       | 41.65       |         | 77 |                    | Hussain khan     | 30.2        | A        |
| 39 | Saud khan        | Haji wajan         | 41.51       |         | 78 | Irfan              | Zarmat khan      | 30.16       | A        |
| 40 | Jamal khan       | Mamtal khan        | 41.32       |         | 79 | Zia ur Rehman      | Rahmat shah      | 29.93       | A        |
| 41 | Ihsan            | Wazir khan         | 41.21       |         | 80 |                    | Syed khan        | 29.81       | A        |
| 42 | Muhammad saeed   | Abdul haleem       | 41.19       |         | 81 |                    | Hanif jan        | 29.35       | Nil      |
| 43 | Masud ur rehman  | Muhabat khan       | 40.97       |         | 82 |                    | Syed rehman      | 27.37       | Nil      |
| 44 | Ibrahim khan     | Fayam shah         | 40.34       |         | 83 |                    | Muhammad hussain | 27.35       | A        |
| 45 | Sajid ur rahman  | Noor               | 40.3        |         | 84 |                    |                  | 27.39       | Nil      |
| 46 | Shamsul wahahb   | Abdul wahid        | 40.28       |         | 85 |                    | Gul mir shah     | 25.33       | Nil      |
| 47 | Khalil ur reham  | Malak gul bat khan | 40.27       |         | 86 |                    | Abdul rahim      | 25.97       | Nil      |
| 48 | Hameed ullah     | Haji pira gul      | 39.48       |         | 87 |                    | Noor mar khan    | 24.94       | A        |

9  
**ATTESTED**

| #  | Name & Designation | Age   | Religion | Signature | Date |
|----|--------------------|-------|----------|-----------|------|
| 52 | Gul Hassan         | 39.24 | D        |           |      |
| 53 | Farid Hussain      | 38.59 | A        |           |      |
| 54 | Geeta Zaman        | 37.99 | A        |           |      |
| 55 | Mohammed Idrees    | 38.31 | A        |           |      |
| 56 | Haji Dahi Khan     | 37.99 | A        |           |      |
| 57 | Damar Zaman        | 37.9  | A        |           |      |
| 58 | Mohammed Jannahid  | 38.5  | A        |           |      |
| 59 | Zubir Khan         | 38.5  | A        |           |      |
| 60 | Tanidar            | 38.5  | A        |           |      |
| 61 | Mohammed Ayoub     | 38.5  | A        |           |      |
| 62 | Khajil Ur Refman   | 38.5  | A        |           |      |
| 63 | Sulman             | 38.5  | A        |           |      |
| 64 | Sahwa Albar        | 38.5  | A        |           |      |
| 65 | Dil Bar Khan       | 38.5  | A        |           |      |
| 66 | Said Janan         | 38.5  | A        |           |      |
| 67 | Dawlat Mir Jan     | 38.5  | A        |           |      |
| 68 | Mohammed Rehman    | 38.5  | A        |           |      |
| 69 | Patr Aslam Khan    | 38.5  | A        |           |      |

Committee Members

- # Name & Designation Act as Signature
1. Sulman Khan Act as Sulman
  2. Mohammed Idrees Act as Mohammed Idrees
  3. Damar Zaman Act as Damar Zaman
  4. Khajil Ur Refman Act as Khajil Ur Refman
  5. Sahwa Albar Act as Sahwa Albar

**ATTESTED**

|    |              |                 |       |   |    |                  |                 |       |   |
|----|--------------|-----------------|-------|---|----|------------------|-----------------|-------|---|
| 50 | Fazal jan    | Sardar khan     | 39.14 | A | 88 | Mohammad jamslid | Khawaja Akhbar  | 24.65 | A |
| 51 | Gul Hassan   | Khan bahadar    | 38.59 | A | 89 | Zubair khan      | Dil bar khan    | 24.65 | A |
| 52 | Shamsu islam | Muhammad idrees | 38.31 | A | 90 | Tanidar          | Said janan      | 24.29 | A |
| 53 | Fazal haq    | Haji dalil khan | 37.99 | A | 91 | Mohammad ayoub   | Dawlat mir jan  | 22.77 | A |
| 54 | Gohar zaman  | Qamar zaman     | 37.9  | A | 92 | Khalil ur rehman | Mohammad rehman | 15.61 | A |
|    |              |                 |       |   | 93 | Suliman          | Mir aslam khan  | 12.72 | A |

**Committee Members**

| S# | Name & Designation | Act as | Signature |
|----|--------------------|--------|-----------|
| 1  | _____              | _____  | _____     |
| 2  | _____              | _____  | _____     |
| 3  | _____              | _____  | _____     |
| 4  | _____              | _____  | _____     |
| 5  | _____              | _____  | _____     |

  
**ATTESTED**



Annex "D"

**ADD. AGENCY EDUCATION  
OFFICE SADDA KURRAM AGENCY.**

PHONE: 0926-520674 FAX 0926520674

No: \_\_\_\_\_/Edu:

Dated Sadda: the \_\_\_\_/\_\_\_\_/2013

(25)

**APPOINTMENT.**

Consequent upon the approval by the Selection Committee, the appointment of the following **Junior Clerk** is hereby ordered in the school noted against his name against vacant post purely on Regular contract basis in BPS No 7 Plus usual allowances as admissible under the rules with immediate effect.

| S # | Name of Candidate  | Father Name | School where Appointed | Remarks             |
|-----|--------------------|-------------|------------------------|---------------------|
| 1   | Muhammad Alam Khan | Salam Khan  | GHS Makhi Zai          | Against Vacant Post |

**TERMS/CONDITIONS.**

1. He is directed to produce their Medical certificate from the Medical Supdt:AHQ Hospital Sadda Kurram Agency.
2. His age should be between 18-35 years and 18-40 for Female..
3. His appointment is purely made on temporary and Regular contract basis and liable to termination at any time without assigning any notice, in case they wants to resign their post, he will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the Issuing Authorities concerned.
5. If he failed to take over charge within 15 days, their appointment will automatically be considered as cancelled.
6. Charge reports should be submitted to this office.
7. His appointment will be consider as regular but without Pension/gratuity on the term of section-15 of the KPK Civil Servant Act 1973 as amended with civil servants amendment Act: 2003 but will be entitled to contribution Provident Fund at such rate as may be prescribed by the govt

*Official*

Add: Agency Education Officer  
Lower & Central Kurram Sadda.

No 377-81\_\_\_/ Edu Dated \_21/01\_\_\_/2013

Copy forwarded to the.

1. Director of Education FATA KPK Peshawar.
2. Agency Account officer Parachinar.
3. Political Agent Kurram Parachinar..
4. Teachers Concerned.
5. Headmaster concerned..

**ATTESTED**

*Official*

Add: Agency Education Officer  
Lower & Central Kurram Sadda

Annex "E"

96

**CHARGE REPORT**

Certified that Mr. Muhammad Alam Khan S/O Salam Khan took over charge of the post of Junior Clerk BPS 07 on 22.01.2013 Fore Noon at GHS Makhizai Lower Kurram Agency Vide No,377-81/Edu dated 21.01.2013 Additional Agency Education Officer Lower Kurram Agecny.



Signature of relieving

signature of relieved Vacant Post

End# 250-56

dated 22/01/2013



Head Master GHS Makhizai

Lower Kurram Agency

9  
**ATTESTED**



Ammer

Date : 15/12/2015

(27)

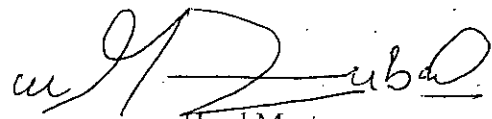
TO WHOM IT MAY CONCERN

This is to certify that **Mr. Muhammad Alam Khan S/O Salam Khan** has been appointed as junior Clerk BPS 07 against vacant post at Government high school Makhizai lower kurram agency dated 22/01/2013 vide No, 377-81/Edu by the additional agency education officer lower kurram agency. He is very punctual, enthusiastic, efficient and devoted to his job. He is extremely cooperative and his attitude with colleagues and senior is very cordial. He is the man of bearing good moral character.

Thanks

Dated: 15/12/2015

With Regard



Head Master  
GHS Makhizai  
Lower Kurram

Agency  
**HEAD MASTER**  
G.H.S Makhizai  
Lower Kurram Agency

(9)  
**ATTESTED**

TERMINATION ORDER

Consequent upon the direction by the competent authority, Director of Education FATA Peshawar vide his No 12228 dated 07.12.2015, on the decision of oversight committee the following in-eligible teaching/Non teaching appointees (M/F) BPS (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

| S # | Name               | Father Name     | Desg:      | B P S | Name of Institution | Remarks  |
|-----|--------------------|-----------------|------------|-------|---------------------|--|
| 1   | Aqib Zaman         | Said Amir Shah  | CT         | 9     | GHS Bagan           | Terminated due to excess in sub divisional quota.  |
| 2   | Muhammad Asif      | Syal Khan       | CT         | 9     | GHS Makhizai        | Terminated due to excess in sub divisional quota & advance appointment against on fill post. |
| 3   | Sara Bibi          | Sakhi Mar Jan   | DM         | 9     | GGMS Bagan          | DM diploma found fake & bogus.   |
| 4   | Shahid Mehmood     | Haji Sher Shah  | PET        | 9     | GMS Sraghurga       | Diploma of JPPE found fake & bogus.  |
| 5   | Muhammad Usman     | Haji Shah Wazir | PET        | 9     | GMS Arawali         | Having no professional qualification.  |
| 6   | Muhammad Alam Khan | Salam Khan      | I/C        | 7     | GHS Makhizai        | Failed in typing test & rejected by enquiry officers.  |
| 7   | Zubair Khan        | Ghafoor Khan    | I/C        | 7     | GGDC Bagan          | Rejected by PA enquiry.  |
| 8   | Muhammad Sadiq     | Gul Mar Jan     | I/C        | 7     | GGDC Alizai         | Failed in typing test as per advertisement & rejected by enquiry officers.                   |
| 9   | Sakhi Akbar        | Sadiq Akbar     | I/C        | 7     | GHS Kochi           | Failed in typing test as per advertisement & rejected by enquiry officers.                   |
| 10  | Sadia Batool       | Abid Alam Jan   | Lab/A-sstt | 7     | GGDC Alizai         | Documents not provided for verification.   |
| 11  | Muhammad Saeed     | Zar Bat Khan    | CT         | 9     | GHS Baza            | Terminated due to excess in sub divisional quota.  |
| 12  | Muhammad Sadiq     | Abdul Rasheed   | CT         | 9     | GMS Ossai           | Terminated due to excess in sub divisional quota.  |
| 13  | Latif Hussain      | Inam Hussain    | CT         | 9     | GHS Angori          | Domicile holder of upper kurram.   |
| 14  | Wahid Zaman        | Zawta Khan      | CT         | 9     | GHS Dogar           | Terminated due to excess in sub divisional quota.  |
| 15  | Farooq Muhammad    | Arab Gul        | CT         | 9     | GMS Taudy Oby       | Out of merit (M.Ed has wrongly been considered in place of MA)                               |
| 16  | Ajmal Akbar        | Akbar Khan      | CT         | 9     | GGMS Dogar No -2    | Terminated due to excess in sub divisional quota.  |

⑨  
**ATTESTED**

Additional agency Education officer  
Lower & Central kurram agency  
No. 2987-23/Edu  
Dated. 11-12-2015

18

**TERMINATION ORDER.**

Consequent upon the direction by competent authority, Director of Education FATA Peshawar vide his no. 12228 dated 07-12-2015 on the decision of oversight committee the following in-eligible teaching/non teaching appointees (m/F) BPA (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

| S# | Name               | F/ Name         | Desg: | B<br>P<br>S | Name of institution | Remarks   |
|----|--------------------|-----------------|-------|-------------|---------------------|---|
| 1  | Aqlb Zaman         | Said Amir Shah  | CT    | 9           | GHS Bagan           | Terminated due to excess in sub divisional quota                          |
| 2  | Muhammad Asif      | Syal khan       | CT    | 9           | GHS Makhuzu         | in sub divisional quota & advanced appointment against on fill post       |
| 3  | Sara bibi          | Sakhi mar jan   | DM    | 9           | GGMS Bagan          | DM diploma found fake & bogus   |
| 4  | Shahid Mehmood     | Haji Sher Shah  | PET   | 9           | GMS Sraghurga       | Diploma of JDPE found fake & bogus.                                       |
| 5  | Muhammad usman     | Haji Shah wazir | Pet   | 9           | GMS Arawali         | Having no professional qualification                                      |
| 6  | Muhammad Alam Khan | Salam khan      | I/C   | 7           | GHS Markuzai        | Failed in typing test & rejected by enquiry officer.                      |
| 7  | Zubair Khan        | Ghafoor Khan    | I/C   | 7           | GDC Bagan           | Rejected by PA enquiry  |
| 8  | Muhammad Sadiq     | Gul Mar jan     | I/C   | 7           | GGDC Ahzair         | Failed in typing test as per advertisement & rejected by enquiry officer. |
| 9  | Sakhi Akhbar       | Sadiq Akbar     | I/C   | 7           | GHS Kochi           | Failed in typing test as per advertisement & rejected by enquiry officer  |
| 10 | Sadia Batool       | Abid Alam Jan   | Lab/A | 7           | GGDC                | Documents not provided  |
| 11 | Muhammad Saeed     | Zar bat khan    | Ct    | 9           | GHS                 | Terminated due to excess in sub divisional quota.                         |
| 12 | Muhammad Sadiq     | Abdul Rasheed   | CT    | 9           | GMS Ossai           | Terminated due to excess in sub divisional quota                          |
| 13 | Latif Hussain      | Imam Hussain    | CT    | 9           | GHS Augori          | Domicile holder of upper Kurram   |
| 14 | Wahid Zaman        | Zawta khan      | CT    | 9           | GH Dogar            | Terminated due to excess in sub divisional quota                          |
| 15 | Farroq Muhammad    | Arab Gul        | CT    | 9           | GMS Taudy oby       | Out of merit (m.Ed has wrongly been considered in place of MA)            |
| 16 | Ajmal Akbar        | Akbar khan      | CT    | 9           | GGMS Dogas No-2     | Terminated due to excess in sub divisional quota                          |

ATTESTED

|    |              |                   |     |   |                     |  |
|----|--------------|-------------------|-----|---|---------------------|--|
| 17 | Bibi Sakina  | Haji Gao Akbar    | CT  | 9 | GGMS Tabi Khonikhel | Terminated due to excess in sub divisional quota   |
| 18 | Samreen Sada | Haji Amin Khan    | DM  | 9 | GGMS Tarali         | Documents not provided for verification.   |
| 19 | Shanaim Bibi | Spin Gul          | DM  | 9 | GGMS Dogar NO -2    | Having no DM certificate & has not provide BA degree for verification  |
| 20 | Parveen Bibi | Spin Gul          | DM  | 9 | GGMS Ossai          | Having no DM certificate & has not provide BA degree for verification  |
| 21 | Bibi Jamila  | Niaz Bahadar Khan | DM  | 9 | GGMS Tabi khonikhel | Having no DM certificate/diploma   |
| 22 | Sajid Rehman | Haji Haider Khan  | PET | 9 | GMS Dappa           | JDPE diploma found false & bogus.  |
| 23 | Zia ul Alam  | Noor Alam         | PET | 9 | GMS Khazeena        | JDPE diploma found false & bogus.  |
| 24 | Gul Hassan   | Khan Bahadar      | PET | 9 | GMS Jilamai         | JDPE diploma found false & bogus.  |
| 25 | Kifayatullah | Air Jehan         | PET | 9 | GMS Kimal Baza      | Having no professional documents.  |
| 26 | Zar Taj Bibi | Haji Ajmir Khan   | PET | 9 | GGMS Ossai          | Having no professional documents & Lower Kurram domicile holder while she was appointed in Central Kurram, also appeared in CT (LK) while appointed as PET (CK). |
| 27 | Sajid Rehman | Said Aslam Khan   | I/C | 7 | GHS Paloseen        | Has been excluded by PA enquiry.   |
| 28 | Siraj U Din  | Walayat Khan      | I/C | 7 | GHS Manatoo         | Failed in typing test as per advertisement & rejected by enquiry officers.   |

99

Addl: Agency Education Officer  
Lower & Central Kurram Sadda.

No. 2987-93 /Edu: Dated 11 / 12 /2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for similar action.

Addl: Agency Education Officer  
Lower & Central Kurram Sadda.

9  
**ATTESTED**

|    |               |                  |     |   |                     |  |
|----|---------------|------------------|-----|---|---------------------|--|
| 17 | Bibi Sakina   | Haji Gul Akbar   | CT  | 9 | GGMS tabi Khonikhel | Terminated due to excess in sub divisional quota   |
| 18 | Samreen Sadaf | Haji Amin Khan   | DM  | 9 | GGMS Tarali         | Documents not provided for verification  |
| 19 | Shamin Bibi   | Spin Gul         | DM  | 9 | GGMS Dogar No2      | Having no DM Certificate & has not provide BA degree for verification  |
| 20 | Parveen Bibi  | Spin Gul         | DM  | 9 | GGMS Ossai          | Having no DM Certification & has not provide BA Degree for verification  |
| 21 | Bibi Jamila   | Khan             | DM  | 9 | GGMS tabi khonikhel | Having no DM certificate / Deploma   |
| 22 | Sajid Rahman  | Haji Haider Khan | PET | 9 | GMS DAPA            | JDPE diploma found fake & bogus  |
| 23 | Zia ul Alam   | Noor Alam        | Pet | 9 | GMS Khazeena        | JDPE diploma found fake & bogus  |
| 24 | Gul Hassan    | Khan Bahadar     | PET | 9 | GMS Jilamai         | JDPE diploma found fake & bogus  |
| 25 | .....         | Mr. Jehan        | PET | 9 | GMS Kunal Baza      | Having no professional documents   |
| 26 | Zar Taj Bibi  | Haji Anmir Khan  | Pet | 9 | GGMS Ossai          | Having no professional documents & lower Kurram domicile holder while she was appointed in Central Kurram also appointed ... |
| 27 | Sajid Rehman  | Said Adam Khan   | I/C | 7 | GHS                 | Has been expelled by pa enquiry  |
| 28 | Siraj U Din   | Walayat Khan     | I/C | 7 | GHS Manatooo        | Failed in typing test as per advertisement & rejected by enquiry officers.   |

**Add. Agency Education Officer  
Lower & Central Kurram Sadda.**

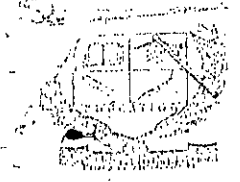
No 2987-93 /Edu dated 11-12-2015

Copy for information to the: -

1. Director of education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency
4. Agency Account Officer Kurram Agency.
5. Assistant political agent Lower Kurram
6. Assistant Political Agent Central Kurram.
7. Principals/ Headmasters concerned for similar action

**ATTESTED**

**Add: Agency Education Officer.  
Lower & Central Kurram Sadda**



✓  
 Amreen H  
 30

**ENQUIRY REPORT**

**1-Introduction**  
 In pursuance of Directorate of Education Endst: No. 5191-99 dated 09/04/2013 forming a committee consisting of the undersigned an impartial enquiry was conducted as desired.

**2-Background:**  
 The Political Agent Kurram Agency has requested to look in to the matter of appointments of Agency cadre post in central Kurram with the observation that Addl: AEO has made appointment in violation of approved policy and various official notifications.

**3-Procedures:**  
 The committee visited the office of the Addl: AEO Sadda Lower and Central Kurram on 06/05/2013 discussed the issue with the current Addl: AEO and Ex Addl: AEO, checked all the available record, appointment orders, documents of the candidates, interview and merit list signed by the DSC. Details are given below (Ann: A+B)

**4-Findings:**  
**Appointment Orders (Female) In different teaching cadres**

|      |      |    |   |
|------|------|----|---|
| i.   | CTs  | CK | Total No. 8 vide endst: No. 143-55 dated 15/01/2013           |
| ii.  | -do- | LK | Total No. 2 vide No. 234-12 dated 18/1/2013                   |
| iii. | DMS  | CK | Total No. 4 vide endst: No. 125-33 dated 10/01/2013           |
| iv.  | -do- | LK | Total No. 01 vide endst: No. 261-68 dated 18/01/2013          |
| v.   | PETs | LK | Total No. 01 vide endst no. 202-207 dated 15/01/2013 (Ann: C) |

ii. Non-teaching staff  
 Lab Asst LK 02 vide endst: NO. 272-80 dated 18/01/2013 (Ann: D)

iii. **Appointment Orders (male) In different teaching cadres**

|      |         |  |
|------|---------|--|
| i.   | CTs CK  | Total No. 17+1=18 vide endst: NO. 156-77 dated 15/01/2013 and vide endst No. 392-96 dated 21/01/2013     |
| ii.  | CTs LK  | Total No. 5+1=7 vide endst: No. 221-33 dated 18/01/2013 and endst No. 387-91 dated 21/01/2013            |
| iii. | DMS CK  | Total No. 3 vide endst: No. 134-42 dated 15/01/2013  |
| iv.  | DM LK   | Total No. 1 vide endst: No. 253-60 dated 18/01/2013  |
| v.   | PETs CK | Total NO. 4 vide endst No. 193-201 dated 15/01/2013  |
| vi.  | PETs LK | Total No. 3+1 vide endst NO. 253-52 dated 18/01/2013 and vide endst NO. 382-86 dated 21/01/2013 (Ann: E) |

iv. **Non-teaching Staff Male:**

|      |              |  |
|------|--------------|--|
| i.   | JC CK        | Total No. 3 vide endst No. 178-85 dated 15/01/2013   |
| ii.  | JC LK        | Total No. 3+1 vide endst No. 287-96 dated 18/01/2013 and endst No. 377-81 dated 21/01/2013 |
| iii. | Lab Asst: CK | Total No. 02 vide endst 186-92 dated 15/01/2013  |
| iv.  | Lab Asst: LK | total NO. 02+1 vide No. 269-77 dated 18/01/2013 and endst 372-76 dated 21/01/2013          |
| v.   | Pesh Imam LK | total NO. 1 vide endst: 297-304 dated 18/01/2013   |

(Ann: F)  
 Total No. of appointment (F&M teaching and Non teaching) 18+50=68

*Soon*  
*Amreen H*  
*check*  
*18/1/13*  
*Amreen H*  
*18/1/13*

**ATTESTED**

ENQUIRY REPORT

30

1. Introduction

In pursuance of Directorate of Education Endst No. 5191-99 dated 09-04/2013 forming a committee consisting of the undersigned and impartial enquiry was conducted as desired.

2. Background

The political gent kurran agency has requested to look in to the matter of appointments of agency cadre post in central Kurram with the observation that Addl. AEO has made appointment in violation of approved policy and various official notifications.

3. Procedure

The committee visited the office of the Addl. AEO Sadda Lower and Central Kurram on 06/05/2013 discussed the issue with the current Addl AEO and EX Addl AEO, checked all the available record appointment orders, documents of the candidates, interview and merit lists singed by the DSC. Details are given below (ann A+B)

4. Findings

- i. Appointment order (female) indifferent teachings cadres.
- |     |      |     |  |
|-----|------|-----|--|
| I   | CTS  | CK  | Total No. 8 vide Endst no. 143-55 dated 15/01/2013             |
| ii  | Do   | i.k | Total no 2 vide no 234-42 dated 18/1/2013                      |
| iii | DMs  | Ck  | Total no. 4 vide Endst no. 125-33 dated 10/01/2013             |
| iv  | Do   | ik  | Total no. 01 vides Endst. No. 261-68 dated 18/01/2013          |
| V   | Pets | Ik  | Total no. 01 vides Endst. No. 202-207 dated 15/01/2013 (ann c) |

ii. Non teaching staff

Lab assistant vide ends no. 278-80 dated 18-01-2013 (Aann D)

## iii appointment order male in deferent teaching cadres

- i. CTs. CK total no. 17+1=18 vide Endst No. 156-77 dated 15-01-2013 and vide Endst no. 392-96 dated 21-01-2013
- ii cts lk total no. 6+1=7 vide Endst no 221-33 dated 18-01-2013
- iii dms ck total no. 3 vide Endst no. 134-42 dated 15-01-2013
- iv dm lk total no.1 vie Endst no. 253-60 dated 18-01-2013
- v. pets ck total no. 4 vide Endst no. 193-201 dated 15-01-2013
- vi. Pets lk total no. 3+1 vide Endst no. 253.52 dated 18-01-2013  
And vide Endst no. 382-86 dated 21-01-2013 (Ann c)

iv Non teaching staff male

- i. jc ck total no. 3vide Endst no. 178-85 dated 15-01-2013
- ii. jc lk total no. 3+1 vide Endst no. 287-96 dated 18-01-2013 and Endst no. 377-81 dated 21-01-2013
- iii. Lab asstt. Ck total no. 02 vide Endst 186-92 dated 15-01-2013.
- iv. Lab asstt. Total no. 02+1 vide no. 269-77 dated 18/01/2013 and Endst 372-76 dated 21-01-2013
- v. Pesh imam lk total No. 1 vide Endst 297-304 dated 18-01-2013.

Total no. of appointment (F&M teaching and non teaching) 18+50=68

  
ATTESTED

The total No of appointments made are 68 and not 71 as reported  
political Agent Kurram agency vide His Office Memo No.555-60  
08/03/2013.

31

After thoroughly checking the interview list, Merit list, Advertisement  
appointment orders it was found that all the appointments were  
according to the unapproved prescribed policy of the Khyber Pakhtoon  
however some irregularity and violation were also observed which is  
below

2-Male

- 1. Majeed Noor S/O Pto Noor, on the top of CT Merit list, but have no pro-  
qualification, has been appointed against technical CT post. He has a certifi-  
CT General Course. He was appointed because of non-availability of ca-  
with prescribed qualification.
- 2. Muhammad Asif S/o Siyat Khan appointed in advance against a CT post  
going to be vacated in Jun/July after the retirement of Gulab Jan CT GHS I  
L.K.

3-Female Central Kurram (DMS)  
Kijayat S/o Mir Jehan, appointed against PET post at GMS Kamal Baza on the  
of discharge certificate.  
Muhammad Iqbal Khan S/o Sahm Khan appointed in GHS Maheczan (L.K.)  
basis of computer skill. (Ann. E&F)

Only one candidate merit position 1 is qualified with relevant pro-  
qualification but the other three candidates appointed on the basis of  
irrelevant subject in the SSC. No such provisions exists in the Policy or advertise-  
ment. Zahir Uddin D/o Ameer Khan Merit position No.9, appointed as PET at GMS  
on the basis of his religious sect as usual practice. But she does not fulfil  
prescribed qualification and is untrained. Merit Position 1, 2, 3 and 4 in  
it was mentioned in advertisement that all vacancies will be filled up after  
service teacher's promotion as per prescribed policy. But the share of  
service teacher has completely been ignored and all positions have been filled  
without sparing their discharge. (Ann. E&F)

4-Approval of the merit List

As for as the approval of merit list from the competent authority is concerned  
then Addl AEO concerned had submitted to the Secretary SSD vide letter no  
dated 15-01-2013. According to him, he was verbally directed to proceed to  
make appointments. A copy of each appointment has also been sent to  
directorates for information, but the local directorate has not raised  
observations against these appointments which amount to tacit approval. (Ann. E&F)

5-IGNORANCE OF SHEIA CANDIDATES

So far Ghia Community of lower Kurram is concerned the Addl AEO have received  
their applications in different teaching and non-teaching cadres and have been  
included in the interview and merit list prepared by the DSC Education  
Department Lower Kurram and some of them have been appointed as per pro-  
practices and traditions prevailing in the Agency. The purpose of these practices

Tuesday, May 28, 2013

ATTESTED

AA



After thoroughly checking the interview list, merit list, advertisement appointment orders it was found that all the appointments were according to the unapproved prescribed policy of the Khyber Pakhton khwa however some irregularity and violation were also observed which is below .

### 2 Male.

1. Mujeeb Noor S/o Pio Noor, on the top of CT merit list, but have no pre qualification has been appointed against technical cr post he has acerdre ct general course. He was appointed because to non availability of with prescribed qualification.
2. Muhammad asif s/o siya kha appointed is advance against a ct post going to be vacated injun/july after the retirement of gulabjan ct GHS l.k
3. kifayat s/o mir jehan appointed against pet post at GMS kamal zaba on it of discharge certificate
4. Muhammad alam khan s/o salam kha appointed GHS maheezai lk basis of computer skill (ann E&F)

### 3 Female central Kurram (DMs)

- i. only one candidate merit posting 1 is qualified with relevant pre qualification but the other three and dates appointed on the basis of relevant subject in the SSC. No such provision exists in the policy or adverts.
- ii. Zartaj bibi D/o ameer khan merit position no. 9 appointed as pet at GGMS c.k on the basis of his religious seat practice but she does not full prescribed qualification and it untrained. Merit position 1 to 3 and r to trained but ignored on the basis to being shia. (as mentioned in ann c)
- iii. It was mentioned in advertisement that all vacancies will be filled up after service teacher's promotion as per prescribed policy. But the share of the service teacher has completely been ignored and all positions have been fill without sparing their due share ann-G

### 4 approval of the merit list

I as for as the approval of merit list from the competent authority is concern then Addl AEQ concerned had submitted to the Secretary SSD vide letter no. dated 15-01-2013. According to him he was verbally directed to proceed make appointments. A coy of each appointment has also been send to directorate for information, but the local directorate has not raised observation against these appointment which amount to tacit approval.

### 5 ignorance of sheia candidates

So far Shia community of lower Kurran is concerned the Addl AEo have received their applications in different teaching and non. Teaching cadres and have been included in the interview and merit list prepared by the DSC education Department lower Kurram and some of them have been appointed as per practices and traditions prevailing in the agency. The purpose of these practices.

Tuesday, may 28, 2013

  
**ATTESTED**

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32

and traditions have been to discourage the absenteeism for the improvement of education. It is further clarified that the area where the sectarian issue is not serious Shia and Suni have been appointed according to normal merit list which is evident from the appointment orders. Moreover, the Adul AEO concerned has requested the AEO upper Kurram at Parachinar to provide the names of such candidates of lower Kurram belonging to Shia community who applied at Upper Kurram to proceed further in the matter vide letter No.3771 dated 28/12/2012 and subsequent reminder no.33 dated 04/01/2013 but in vain at the end of AEO concerned (Ann: I)

Recommendations Conclusions

1. All appointments have been made according to the policy but share of in service teachers has not been spared for them due to the failure of the Department to fulfill Codal formalities/Legal requirements. Moreover Untrained PET and DM teachers have been appointed which is contrary to Advertisement and policy but the AEO has of the view that he has done it according to National Education Policy of 2009 which relax prescribed qualification for the less developed and backward Areas provided the qualified candidates are not available.
2. Para 2 subsections I Muhammad Asif S/C Sial Khan appointment order in advance vide endst No.387-91 dated 21-01-2013 against CT Post and all DM female and PETs Female who are untrained vide Para 3 subsection (I) and (II) may be cancelled.

DMs:

- i. Shamin Bibi D/o Speen-Gul
- ii. Perveen Bibi D/o Speen-Gul
- iii. Bibi Jamila D/o Niaz Bahadar Khan

Vide Endst No. 125/33 dated 15-01-2013

PETs:

- i. Zartaj Bibi D/o Haji Ajmeer Khan vide endst No.702-207 dated 15-01-2013
- ii. Kifayat S/o Mir Jehan Serial No at 4 vide endst No. 193-201 dated 15-01-2013 appointed against PET and Muhammad Alam Khan S/o Salam Khan vide endst No.377-31 dated 21-01-2013 discharge certificates and computer certificate respectively and authenticity of the institutions and equality of discharge certificate may be verified from the quarter concerned.

OR

5- If the Competent Authority is not satisfied and agrees with our

Tuesday, May 28, 2013

  
**ATTESTED**

And traditions have been to discourage the absenteeism for the improvement of education. It is further clarified that the area where the sectarian issue is not serious shia and suni have been appointed according to normal merit list which is evident from the appointment orders, moreover, the Addl. AEO concerned has requested the AEO upper Kurram at Parachinar to provide the names of such candidates of lower Kurram belonging to shia community who applied at upper Kurram to proceed further in the matter vide letter No. 3771 dated 28-12-2012 and subsequent reminder no. 33 dated 04-01-2013 but in vain at the end of AEO concerned (Ann:I)

#### Recommendations conclusions

1. All appointment have been made according to the policy but share of in service teacher has not been spared for them due to the failure of the Department to fulfil codal for militias legal requirement time moreover untrained pet and dm teacher have been appointed which is to advertisement and policy but the AEO has of the view that he has according to national Education policy of 2009 which relax prescribed qualification for the less developed and backward areas rovided the qualified candidates are not available.
2. Para 2 subsections Muhammad asif s/o sial khan appointment order in advance vide Endst no. 387-91 dated 21-01-2013 against ct post and all dms female and pets female whoa re untrained vide para 3 subsection (i)and (ii) may be cancelled.

#### DMS.

- i. Shamim bibi D/O speen Gul
- ii. Serveen bibi D/o speen gul
- iii. Bibi jamila D/o niaz bahadar khan

Vide Endst no. 125-33 dated 15-01-2013

#### PETs.

- i. Zartaj bibi D/o Haji Ajmeer khan vide Endst NO. 202-207 dated 15-01-2013.
- ii. Kifayat S/o mir Jehan Serical No. at r vide Endst no. 193-201 dated 15-01-2013 appointed against pet and Muhammad alam khan s/o salam khan vide Endst no. 377-81 dated 21-01-2013 discharge certificates and computer certificate respectively and euthenics of the institutions and equality of discharge certificate may be verified from the quarter concerned

Or

5. If the competent authority is not satisfied and agrees without.

Tuesday, may 28,2013

  
**ATTESTED**

Findings/ Recommendations it is proposed that Review Committee may be  
Constituted under the Chairmanship of Addl: AEO Lower Kurram including a  
Representative of Directorate of Education FATA to review the whole process  
and prepare the revise merit list according to the policy and advertisement in  
the interest of Public Service.

33

Note: Legal validity of selection criteria provided to the Addl: AEO (G)  
without prior approval of Competent Authority is itself raise a big  
question mark

Enquiry Committee

Asmat Khan  
Principal

GHSS Samma Bala, Peshawar.

Shahzad Khan

Dy. Director

(M&E) FATA Directorate of Education.

Submitted on: 28/5/2013

EDUCATION

FATA (M&E)

Tuesday, May 28, 2013

ATTESTED

Findings/recommendations it is proposed that review committee may be constituted under the chairmanship of Addl: AEO Lower Kurran including a representative of directorate of Education FATA to review the whole process and prepare the revise merit list according to the policy and advertisement in the interest of public service.

Note: legal validity of selection criteria provided to the Addl AEO (c) without prior approval of competent Authority is itself raise a big question mar.

**Enquiry Committee**

**Asmat Khan Principal  
GHSS Samma Badhabera FR  
Peshawar**

**Shah Zarkhan  
Dy. Direcot  
(M&E) FATA directorate of Education**

Submitted on 28/5/2013

  
**ATTESTED**

To,

The Additional Political Agent  
Kurram Agency Parachinar.

Annex 'G'

(34)

Subject: **DEPARTMENTAL APPEAL AGAINST THE ORDER**  
**DATED 07/12/2015 OF ADDITIONAL AGENCY**  
**EDUCATION OFFICER LOWER & CENTRAL KHURRAM**  
**SADDA.**

**Respectfully Sir,**

1. That the appellant hails from a backward area of district lower kurram agency and completed his education through the meager resources of his parents with hopes of a bright future.
2. That the appellant applied through advertisement for the post of junior clerk PBS-07 and after tough competition the appellant stood successful. Finally the appellant got a letter of recommendation NO. 337-81 dated 21/01/2013 where the appellant was recommended to the government for appointment.
3. That at last the Additional agency Education officer lower & central Kurram sadda vide notification dated

**ATTESTED**

21/01/2013 issued the appointment order of the appellant along with others, hence the appellant was appointed.

4. That the appellant joined the post on dated 22/01/2013 and started working at GHS Makhizai lower khurram Agency vide No, 337-81/Edu from the date of his appointment with punctuality and devotion with full satisfaction of the high-up's as well as taught.
5. That the additional Agency Education officer lower & central Kurram sadda issued a termination order after three years of service of the applicant vid No, 12228 dated 07/12/2015 with the direction as illegible appointees (M/F) BPS (7-9) appointed during January 2013 in lower & central Kurram agency.
6. That on the basis of this the Additional Agency Education officer Lower & central Kurram sadda issued termination order dated 11/12/2015 vid No, 2987-93/Edu.
7. That the appellant applied for the post after fulfillment of all the legal requirements and was recommended and appointed against the post on merit.

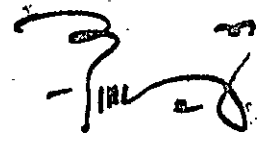
  
**ATTESTED**

(36)

8. That the appellant since the date of his appointment is working against the post and as such valuable rights have accrued to his and should not be punished for wrongs of the other.

It is, therefore, humbly prayed that on acceptance of this Appeal the termination order dated 07/12/2015 may kindly be set aside and the applicant may kindly be restored.

Appellant



Dated: 19/12/2015

**Muhammad Alam Khan**  
s/o Salam Khan  
Village Lower Mandari  
Tehsil and District lower  
kurrām Agency.

  
**ATTESTED**





|                    |
|--------------------|
| Shipper's A/c. No. |
| Reference / Job    |

History ID 1215PEWX33107101311248



4761529187

GST No. 12-00-9808-002-73

**COURIER**

|        |             |
|--------|-------------|
| Origin | Destination |
| PEW    | PEW         |

|   |             |
|---|-------------|
| From (Shipper)  |             |
| MR MUHAMAMD ALAM KHAN   |             |
| KURRAN AGENCY   |             |
| Phone#  |             |
| SMS   | 03009347605 |
| Email   |             |
| PESHAWAR  |             |
| To (Consignee)  |             |
| DIRECTOR OF EDUCATION   |             |
| FATA SECRETARAIT PESHAWAR   |             |
| Phone#  |             |
| PESHAWAR  |             |
| Sender's Authorization  |             |
| I warrant that I have read the terms and conditions on the reverse of this consignment note and that all details given herein are true and correct. I further declare that the contents of this consignment do not contain any liquor. The execution of this consignment note is prima facie evidence of the conclusions of contract between shipper and TCS (PVT) LTD. |             |
| Shipper's Signature   |             |

|                      |                  |                          |
|----------------------|------------------|--------------------------|
| Shipment Detail      | Coupon           | Discount                 |
| Declared Value       |                  |                          |
| 0.00                 |                  |                          |
| Ref. No.             |                  |                          |
| Receiver's Signature |                  |                          |
| Date 19/12/2015      |                  |                          |
| Time 11:59:16        |                  |                          |
| Booking Details      |                  |                          |
| Staff                | 101311           | AZIZ ULLAH JAN           |
| Route                | X33107           | Date 19/12/2015 11:59:16 |
| Receiver's Signature | MAIN SADDAR ROAD |                          |
|                      | Receiving Time   |                          |

|                       |             |
|-----------------------|-------------|
| Pieces                | Weight      |
| 1                     | 0.50        |
| Dimension of Shipment |             |
| 0 0 0                 |             |
| Service Type          |             |
| OVERNIGHT             |             |
| Mode of Payment       |             |
| CASH                  |             |
| Charges               | Pak. Rupees |
| Service               | 87.00       |
| Out of Serv           | 0.00        |
| Handling              | 0.00        |
| Others                | 0.00        |
| GST                   | 13.00       |
| Ins. Prem.            | 0.00        |
| Partner Amt.          | 0           |
| <b>Total</b>          | <b>100</b>  |
| Shipper Copy          |             |



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**ATTESTED**

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Tel: (021) 111 123 456, www.tcs.com.pk

To,

38

**All the Principals/ Headmaster,  
Lower & Central Kurram Agency,**

Subject **Stoppage of Salaries.**

Memo

As you know that in January 2013, newly appointment has been made by this office in various categories.

Therefore, all the Principals and Headmasters are hereby directed to stop their salaries till further order please.

**Add. Agency education officer  
Lower & central Kurram agency**

Endst: no \_\_\_\_\_ edu dated \_\_\_\_\_ 2013

Copy forwarded to the: -

1. Director of education FATA Peshawar.
2. Agency/ Account Officer Kurram.
3. Office file.

**Add. Agency education officer  
Sadda Kurram agency**

  
**ATTESTED**

Annex K

38


All the Principals/Headmasters  
Lower & Central Al. from Agency.

Subject: Stoppage of Salaries.

Memo:

As you know that in January 2013, newly appointment has been made by this office in various categories.

Therefore, all the Principals and Headmasters are hereby directed to stop their salaries till further order please.

  
Add Agency Education Officer  
Lower & Central Al. from Agency

Encl: No. \_\_\_\_\_ / 2013 Dated \_\_\_\_\_ / 2013

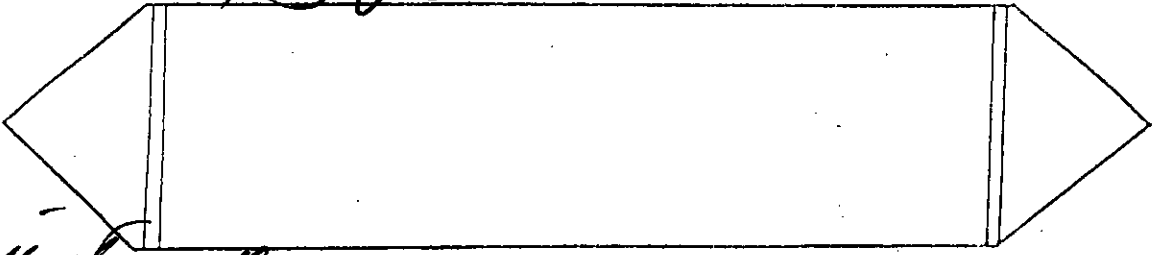
Copy forwarded to the:-

1. Director of Education FATA Peshawar.
2. Agency Account Officer Kurram & Trachin.
3. Office file.

Add Agency Education Officer  
Sidda Kurram (Agency)

  
**ATTESTED**

# یعدالت سندھ ہائی کورٹ



2016ء پنجاب Appellate

محکمہ سہولیات بنام دی. اے. اے. اے. اے. اے.

موزخہ  
مقدمہ  
دعویٰ  
جرم

## باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکن کاروائی متعلقہ  
آن مقام کیلئے محمد علی محمد کیلئے محمد علی محمد  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا۔ نیز  
دکیل صاحب کو راضی نامہ کرنے و تقرر ثالت ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بہ صورت ڈگری کرنے اجراء اور وصولی چیک در و پیرا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زر ایس پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور دکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تارتخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

المرقوم 6 ماہ السیریل 2016

واہ العی

Accepted  
Attested  
Date 20/07/2016

کے لئے منظور ہے۔

بنیام

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal No: 376/2016

Muhammad Alam Junior Clerk GHS Makhizai central Kurram Agency.....Appellant.

VERSUS

1. Additional Agency Education Officer Lower & Central Kurram Sadda.
2. The Director Education FATA.
3. Political Agent Kurram Parachinar.....Respondents.

**Para-wise comments on behalf of respondent No: 1 & 2**

**Respectively Sheweth:**

**Preliminary Objection**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law and no departmental appeal is filed to the competent authority against the impugned order. Hence not maintainable under Section-4 of Service Tribunal Act -1974.

**On Facts:**

1. No comments. Pertains to record.
2. No comments. Pertains to record.
3. Incorrect. It has been clearly mentioned in the terms & conditions of the appointment order of the appellant "that no payment will be made until and unless their academic and professional certificates are got verified from their concerned issuing authorities. The appointment of the appellant has been terminated by the Competent Authority as per enquiry found illegally and has been expelled by Political Agent Enquiry.
4. Correct to the extent that appointment orders were issued to the petitioners and other candidates, but the respondents Department legally intervened and constituted search committee to trace out bogus degree holders, therefore, the committee submitted its report clearly picked out those candidates who had applied through fake/bogus degrees, report of search committee attached as (Annexure-A).
5. Incorrect. No Departmental appeal has been made by the appellant to the appellant authorities against the impugned order. Hence not maintainable under Section-4 of Service Tribunal Act-1974.
6. The respondent department in order to investigate/inquire the anomalies carried out in recruitment process in Kurram Agency held inquiries and constituted search Committee. It is pertinent to mention here that the responsible Officer was charge Sheeted and proposed to the Government for necessary action under E&D rules. However the salaries of those candidates whose degree's/certificates were verified by the over-sight

committee were ordered to be initiate against all those involved in fakism and forgery, copy of letter annexed as (Annexure-B) also a letter No. 12229-36 dated 07/12/2015 was addressed to Additional Agency Education Officer, Lower and Central Kurram Agency for the release of salaries of eligible candidates and terminate in-eligible candidates, copy of letter attached as (Annexure-C).

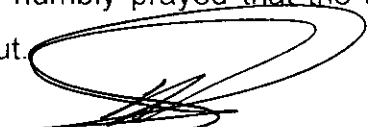
7. Incorrect. The termination order of the appellant has been made by the Competent Authority on the basis of inquiry report. According to law & rules all Government employees are bound to perform their duties as per appeal criteria one is allowed to violate the Government rules. However reply on grounds are as under.

**Grounds:**

- A. Incorrect. The Departmental appeal is not available on the record of respondent department is no action has been taken by the Competent Authority which is against law and natural justice.
- B. Incorrect. According to law & rules and as per inquiry report the Competent Authority terminated the appellant services. The appellant has been treated by the Competent Authority in accordance with law and rules.
- C. Incorrect. As explained in Para-B above.
- D. Incorrect. All codal formalities have been fulfilled by the Competent Authority i.e, conduct an inquiry, verification of documents and other requirements which are must for the appointment of the appellant in light of rules & regulations.
- E. No comments. As explained in Para-D above.
- F. Respondent also seeks permission to advance other grounds and proofs at the time of arguments.
- G. Needs no comments.

In the light of the above explained position it is humbly prayed that the appeal may vary kindly be dismissed with cost throughout.

Respondent NO. 1

  
Director Education FATA  
Peshawar


Respondent NO. 2

  
Agency Education Officer  
Kurram Agency

**AFFIDAVIT**

We the above respondents do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.

Respondent NO. 1

  
Director Education FATA  
Peshawar

Respondent NO. 2

  
Agency Education Officer  
Kurram Agency

ENQUIRY REPORT

34

1. Introduction

In pursuance of Directorate of Education Endst No. 5191-99 dated 09-04/2013 forming a committee consisting of the undersigned and impartial enquiry was conducted as desired.

2. Background

The political gent kurran agency has requested to look in to the matter of appointments of agency cadre post in central Kurram with the observation that Addl. AEO has made appointment in violation of approved policy and various official notifications.

3. Procedure

The committee visited the office of the Addl. AEO Sadda Lower and Central Kurram on 06/05/2013 discussed the issue with the current Addl AEO and EX Addl AEO, checked all the available record appointment orders, documents of the candidates, interview and merit lists singed by the DSC. Details are given below (ann A+B)

4. Findings

i. Appointment order (female) indifferent teachings cadres.

- |     |      |     |  |
|-----|------|-----|--|
| I   | CTS  | CK  | Total No. 8 vide Endst no. 143-55 dated 15/01/2013             |
| ii  | Do   | i.k | Total no 2 vide no 234-42 dated 18/1/2013                      |
| iii | DMS  | Ck  | Total no. 4 vide Endst no. 125-33 dated 10/01/2013             |
| iv  | Do   | ik  | Total no. 01 vides Endst. No. 261-68 dated 18/01/2013          |
| V   | Pets | Ik  | Total no. 01 vides Endst. No. 202-207 dated 15/01/2013 (ann c) |

ii. Non teaching staff

Lab assistant vide ends no. 278-80 dated 18-01-2013 (Aann D)

iii appointment order male in deferent teaching cadres

- |     |         |                   |   |
|-----|---------|-------------------|---|
| i.  | CTs. CK | total no. 17+1=18 | vide Endst No. 156-77 dated 15-01-2013 and vide Endst no. 392-96 dated 21-01-2013 |
| ii  | cts lk  | total no. 6+1=7   | vide Endst no 221-33 dated 18-01-2013   |
| iii | dms ck  | total no. 3       | vide Endst no. 134-42 dated 15-01-2013  |
| iv  | dm lk   | total no. 1       | vie Endst no. 253-60 dated 18-01-2013   |
| v.  | pets ck | total no. 4       | vide Endst no. 193-201 dated 15-01-2013   |
| vi. | Pets lk | total no. 3+1     | vide Endst no. 253.52 dated 18-01-2013  |
- And vide Endst no. 382-86 dated 21-01-2013 (Ann c)

iv Non teaching staff male

- |      |            |                |  |
|------|------------|----------------|--|
| i.   | je ck      | total no. 3    | vide Endst no. 178-85 dated 15-01-2013                                       |
| ii.  | je lk      | total no. 3+1  | vide Endst no. 287-96 dated 18-01-2013 and Endst no. 377-81 dated 21-01-2013 |
| iii. | Lab asstt. | Ck             | total no. 02 vide Endst 186-92 dated 15-01-2013.                             |
| iv.  | Lab asstt. | Total no. 02+1 | vide no. 269-77 dated 18/01/2013 and Endst 372-76 dated 21-01-2013           |
| v.   | Pesh imam  | lk             | total No. 1 vide Endst 297-304 dated 18-01-2013.                             |

Total no. of appointment (F&M teaching and non teaching) 18+50=68

The total No of appointments made in political Agent Kurram Agency vide the Office Memo dated 08/03/2013.

After thoroughly checking the interview list, Merit list, Advertisement appointment orders it was found that all the appointments were according to the unapproved prescribed policy of the Khyber Pakhtoon however some irregularity and violation were also observed which are below:

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2-Male

1. Majeed Noor S/O Pao Noor on the top of CT Merit list, but have no prescribed qualification, has been appointed against technical CT post. He has a certificate of General Course. He was appointed because of non-availability of other candidates with prescribed qualification.
2. Muhammad Asif S/O Sifat Khan appointed in advance against a CT post which is going to be vacated in July/July after the retirement of Gulabjan CT GMS LK.
3. Kilyat S/O Amir Jehan appointed against NET post at GMS Kumbal Bazar on the basis of discharge certificate.
4. Muhammad Alam Khan S/O Salam Khan appointed against GMS Mabeeran (L) on the basis of computer skills (Aan: E&F).

3-Female

- I. Only one candidate merit position 1 is qualified with relevant prescribed qualification but the other three candidates appointed on the basis of relevant subject in the SSC. No such provision exists in the Policy or advertisement.
- II. Zaira Dibi D/O Ameer Khan Merit position No. 9, appointed as NET at GMS (C) on the basis of his religion, sent as usual practice, but she does not fulfil prescribed qualification and is untrained. Merit Position No. 10, and 11 in the advertisement were ignored on the basis of being Shia (As mentioned in Ann: C) It was mentioned in advertisement that all vacancies will be filled up after the service teacher's promotion as per prescribed policy, but the share of the service teacher has completely been ignored and all positions have been filled without sparing their due share. (Ann: G)

4-Approval of the merit List

As far as the approval of merit list from the competent authority is concerned then Addl AEO concerned has submitted to the Secretary SSD wide letter in dated 15-01-2013. According to him, he was verbally directed to proceed to make appointments. A copy of each appointment has also been sent to the directorate for information, but the local directorate has not raised any observations against these appointments which amount to tacit approval.

5-IGNORANCE OF SHIA CANDIDATES:

So far Shia Community of lower Kurram is concerned the Addl AEO have received their applications in different teaching and non-teaching cadres and have been included in the interview and merit list prepared by the DSC Education Department Lower Kurram and some of them have been appointed as per prescribed practices and conditions prevailing in the Agency. The purpose of these practices

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FD



After thoroughly checking the interview list, merit list, advertisement appointment orders it was found that all the appointments were according to the unapproved prescribed policy of the Khyber Pakhton khwa however some irregularity and violation were also observed which is below :

## 2 Male.

1. Mujeeb Noor S/o Pio Noor, on the top of CT merit list, but have no pre qualification has been appointed against technical cr post he has acerdre ct general course. He was appointed because to non availability of with prescribed qualification.
2. Muhammad asif s/o siya kha appointed is advance against a ct post going to be vacated injun/july after the retirement of gulabjan ct GHS l.k
3. kifayat s/o mir jehan appointed against pet post at GMS kamal zaba on it of discharge certificate
4. Muhammad alam khan s/o salam kha appointed GHS maheezai lk basis of computer skill (ann E&F)

## 3 Female central Kurram (DMs)

- i. only one candidate merit posting 1 is qualified with relevant pre qualification but the other three and dates appointed on the basis of relevant subject in the SSC. No such provision exists in the policy or adverts.
- ii. Zartaj bibi D/o ameer khan merit position no. 9 appointed as pet at GGMS c.k on the basis of his religious seat practice but she does not full prescribed qualification and it untrained. Merit position 1 to 3 and r to trained but ignored on the basis to being shia. (as mentioned in ann c)
- iii. It was mentioned in advertisement that all vacancies will be filled up after service teacher's promotion as per prescribed policy. But the share of the service teacher has completely been ignored and all positions have been fill without sparing their due share ann-G

## 4 approval of the merit list

I as for as the approval of merit list from the competent authority is concern then Addl AEQ concerned had submitted to the Secretary SSD vide letter no. dated 15-01-2013. According to him he was verbally directed to proceed make appointments. A coy of each appointment has also been send to directorate for information, but the local directorate has not raised observation against these appointment which amount to tacit approval.

## 5 ignorance of sheia candidates

So far Shia community of lower Kurran is concerned the Addl AEo have received their applications in different teaching and non. Teaching cadres and have been included in the interview and merit list prepared by the DSC education Department lower Kurram and some of them have been appointed as per practices and traditions prevailing in the agency. The purpose of these practices.

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and traditions have been to discourage the absenteeism for the improvement of education. It is further clarified that the area where the sectarian issue is not serious Shia and Suni have been appointed according to normal merit list which is evident from the appointment orders. Moreover, the Addl. AEO concerned has requested the AEO upper Kurram at Peshawar to provide the names of such candidates of lower Kurram belonging to Shia community who applied at Upper Kurram to proceed further in the matter vide letter No.3771 dated 28/12/2012 and subsequent reminder no.33 dated 01/01/2013 but in vain at the end of AEO concerned (Ann:1)

Recommendations Conclusions

All appointments have been made according to the policy but share of in service Teachers has not been spared for them due to the failure of the Department to fulfill Code of Merit/Local Preference. Moreover Untrained PET and DM teachers have been appointed which is contrary to Advertisement policy but the AEO has of the view that he has done so according to National Education Policy of 2009 which prescribes qualification for the less developed and backward Areas provided the qualified candidates are not available.  
2. Para 2 subsections (i) Muhammad Aul S/C Sial Khan appointment order in advance vide endst No.297-91 dated 21-01-2013 against CT Post and all DMs female and PETs female who are untrained vide Para 2 subsection (i) and (ii) may be cancelled.

DMS:

- i. Mumtaz Bibi D/o Speen Gul
- ii. Perveen Bibi D/o Speen Gul
- iii. Habi Jamila D/o Hiaz Bahadar Khan

Vide Endst No. 225-23 dated 15-01-2013.

PETs:

- i. Zartaj Bibi D/o Haji Ajmeer Khan vide endst No.202-207 dated 15-01-2013
- ii. Kifayat S/o Mir Jehan Serial No. 4 vide endst No. 193-201 dated 15-01-2013 appointed against PET and Muhammad Alam Khan S/o Salam Khan vide endst No.377-81 dated 21-01-2013 discharge certificates and computer certificate respectively and authenticity of the institutions and equality of discharge certificate may be verified from the quarter concerned.

OR

5- If the Competent Authority is not satisfied and agrees with our

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And traditions have been to discourage the absenteeism for the improvement of education. It is further clarified that the area where the sectarian issue is not serious shia and suni have been appointed according to normal merit list which is evident from the appointment orders, moreover, the Addl. AEO concerned has requested the AEO upper Kurram at Parachinar to provide the names of such candidates of lower Kurram belonging to shia community who applied at upper Kurram to proceed further in the matter vide letter No. 3771 dated 28-12-2012 and subsequent reminder no. 33 dated 04-01-2013 but in vain at the end of AEO concerned (Ann:I)

#### Recommendations conclusions

1. All appointment have been made according to the policy but share of in service teacher has not been spared for them due to the failure of the Department to fulfil codal for militias legal requirement time moreover untrained pet and dm teacher have been appointed which is to advertisement and policy but the AEO has of the view that he has according to national Education policy of 2009 which relax prescribed qualification for the less developed and backward areas rovided the qualified candidates are not available.
2. Para 2 subsections Muhammad asif s/o sial khan appointment order in advance vide Endst no. 387-91 dated 21-01-2013 against ct post and all dms female and pets female whoa re untrained vide para 3 subsection (i)and (ii) may be cancelled.

#### DMS.

- i. Shamim bibi D/O speen Gul
- ii. Serveen bibi D/o specn gul
- iii. Bibi jamila D/o niaz bahadar khan

Vide Endst no. 125-33 dated 15-01-2013

#### PETs.

- i. Zartaj bibi D/o Haji Ajmeer khan vide Endst NO. 202-207 dated 15-01-2013.
- ii. Kifayat S/o mir Jehan Serical No. at r vide Endst no. 193-201 dated 15-01-2013 appointed against pet and Muhammad alam khan s/o salam khan vide Endst no. 377-81 dated 21-01-2013 discharge certificates and computer certificate respectively and euthenics of the institutions and equality of discharge certificate may be verified from the quarter concerned

Or

5. If the competent authority is not satisfied and agrees without.

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Findings/ Recommendations It is proposed that Review Committee may be constituted under the Chairmanship of Addl. AEO Lower Kurram including a Representative of Directorate of Education FATA to review the whole process and prepare the revised merit list according to the policy and advertisement in the interest of Public Service.

37

Note: Legal validity of selection criteria provided to the Addl. AEO (L) without prior approval of competent Authority itself raise a big question mark

Inquiry Committee

Asmat Khan

Principal

G.H.S Samma Buzi, District Peshawar.

Signature

Dy. Director

(M&E) FATA Directorate of Education

Submitted on: 28/5/2013

FATA (M&E)

Tuesday, May 28, 2013

(34)

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Findings/recommendations it is proposed that review committee may be constituted under the chairmanship of Addl: AEO Lower Kurran including a representative of directorate of Education FATA to review the whole process and prepare the revise merit list according to the policy and advertisement in the interest of public service.

Note: legal validity of selection criteria provided to the Addl AEO (c) without prior approval of competent Authority is itself raise a big question mar.

**Enquiry Committee**

**Asmat Khan Principal  
GHSS Samma Badhabera FR  
Peshawar**

**Shah Zarkhan  
Dy. Direcot  
(M&E) FATA directorate of Education**

**Submitted on 28/5/2013**

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No:- \_\_\_\_\_/2017

Muhammad Alam ..... Appellant

Versus

Additional Agency Education Officer & others.....Respondents

REJOINDER ON BEHALF OF THE  
APPELLANT

Respectfully Sheweth:

Reply to Preliminary objections:

1. Para No.1 is incorrect, hence denied. the appellant has got a cause of action which is properly been mentioned in appeal.
2. Para No.2 is incorrect, hence denied. The appellant has came to the court with clean hands.
3. Para No.3 is incorrect, hence denied. The appellant has mentioned all the facts material to the case in his appeal.
4. Para No.4 is incorrect, hence denied.
5. Para No.5 is incorrect, hence denied. All the necessary persons have been made party to appeal.
6. Para No. 6 is incorrect, hence denied. The appeal has been filed and after when statutory period for

disposal expired, the appellant preferred the present appeal.

REPLY ON FACTS:-

1. Need no Comments.
2. Need no Comments.
3. Para No. 3 is incorrect hence denied in fact according to the constitution of Pakistan; no one should be deprived from the salaries of any duty which he had performed. Moreover, the terms and condition mentioned is violating the fundamental right of a citizen provided under the Constitution and the appellant having the meritorious qualification being eligible for the post concerned. However the inquiry conducted by the respondent is concerned, there is no evidence against the appellant whatsoever neither his name has been mentioned in the entire inquiry been mentioned in the entire inquiry report.
4. Para No. 4 of the Comments the respondents admitted that the appellant was appointed and the appointment letter was issued to the appellant to the extent of inquiry conducted by the respondent is incorrect, the respondents allegedly picked out the fact and bogus degree holders, it is pertinent to mention here that in the entire committee report the name of appellant had been shown being a pack<sup>s</sup> degree holder or any other deficiencies the appellant already submitted appeal before this Honourable Tribunal in which qualification has been mentioned and also the academic credential are annexed. Hence the appellant neither mentioned in the whole inquiry report nor his degrees were found

to be bogus, the termination order being illegal without lawful means and liable to be set aside.

5. Para No. 5 incorrect hence denied. Indeed the appellant has already submitted an appeal to the respondents which is evident from the receipt of TCS which has been annexed with the appeal but the respondent intentionally and deliberately did not decide the said departmental appeal within a statutory period, moreover the appellant time and again made several reminder with the request for the re-instatement with suggestions and for comments in result of the respondents submitted. Their comments before the Additional Political Agent Kurram where the name of appellant was never ever mentioned in the list of disqualified candidate nor any observation made of the appointment of appellant.
6. Para No. 6 is incorrect hence denied neither the name of appellant has been mentioned in the entire inquiry nor any observation had been made against the appellant in respect of having of a bogus degree or any illegality, the respondent has illegally been issued the termination order of appellant.
7. Para No. 7 is incorrect hence denied. The entire inquiry has been conducted illegally, unlawfully and violated the fundamental rights of the appellant.

#### REPLY ON GROUNDS

A. Para "A" of the grounds is incorrect hence denied. The detail reply has been given and also mentioned in the appeal.

B. Para "B" is incorrect hence denied.



C. Para "C" is incorrect hence denied.

D. Para "D" is incorrect hence denied.

E. Para "E" is incorrect hence denied.

F. Para "F" needs no comments.

G. Para "G" needs no comments.

It is, therefore, most humbly prayed that on acceptance of this rejoinder the comments of the respondents may kindly be considered null and void in the eyes of law and the appeal of the appellant may kindly be allowed with all back benefits to meet the end of justice.

Appellant  
Through

Date: 18/2/2017

Irfan Ali Yousafzai  
Advocate High Court



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No:- \_\_\_\_\_/2017

Muhammad Alam ..... Appellant

**Versus**

Additional Agency Education Officer & others.....Respondents

**AFFIDAVIT**

I, Irfan Ali Yousafzai (Advocate), do hereby solemnly affirm and declare that as per instruction of my client the contents of the accompanying Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

*Irfan Ali Yousafzai*