

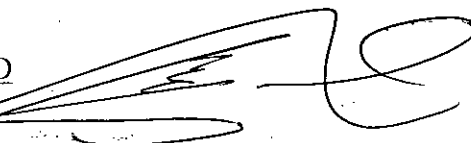
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	27.03.2015	<p style="text-align: center;"><u>Khyber Pakhtunkhwa Service Tribunal Peshawar</u></p> <p style="text-align: center;">Appeal No. 1521/2013 Jehan Zeb-vs- Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Peshawar. etc.</p> <p style="text-align: center;"><u>ABDUL LATIF, MEMBER</u>:- Counsel for the appellant (Mr. Noor Muhammad Khattak, Advocate), M/S Khursheed Khan, SO and Bashir Ahmad, Head Master with Mr. Muhammad Jan GP for the respondents present.</p> <p>2. Appellant Jehanzeb was transferred from GPS, Zarif Shah Banda to GPS, Shah Haider Banda vide order dated 31.07.2013 against which his departmental appeal dated 05.08.2013 succeeded and resultantly appellant was posted in GPS Nashorro Kandow vide order dated 21.09.2013. In compliance of which order he took over charge on 25.09.2013. Unfortunately this last order was cancelled by the respondents vide impugned order dated 31.10.2013 against which appellant has instituted this appeal before Tribunal under Secion-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.</p> <p>3. The respondent-department have filed their para-wise comments which is also available on record.</p> <p>4. Arguments hared and record perused.</p> <p>5. Contention of learned counsel for the appellant is that cancelation impugned order dated 31.10.2013 caused pre-mature transfer of the appellant which is against the Government policy of Transfer and posting. It was further submitted that the impugned order was politically motivated for which the learned counsel for the appellant referred to letter dated 03.12.2013 from the office of District Education Office Malakand to the S.O Primary Govt: of Khyber Pakhtunkhwa E&SE Peshawar. Next it was submitted that this cancellation order tantamount to withdraw of the relief granted in the shape of the order which was cancelled and hence against the principle of Locus-potentia reliance was placed on 2000 SCMR 67, 2007 SCMR 599 and 2003 MLD 507 (H). The learned counsel for the appellant requested that the impugned cancellation order may be set aside and the appellant may be let to perform his duty at GPS Nashorro Kandow which also falls within jurisdiction of his Union Council.</p>

AF-1

6. Contrary it was submitted by the learned Government Pleader on behalf of the respondent-department that the appellant has not filed any departmental appeal against cancellation order dated 31.10.2013, hence this appeal is not maintainable in the light of Section-4 of the Khyber Pakhtunkhwa Service Tribunal, ACT 1974. It was further submitted that the fact has been given to the impugned order on behalf of the appellant and he has taken charge at the relevant school, therefore, the order has been acted upon can not be disturbed. Reliance was placed on PLJ 1996 (S.C) 601.

7. The Tribunal heard the learned counsel for the parties at length and perused the record with their assistance. Appellant was posted at GPS Zarif Shah Banda as a result of promotion/up-gradation vide order dated 09.02.2013 wherefrom he was transferred after 5 months to GPS Shah Haider Banda vide order dated 31.07.2013. Since that place, as stated by learned counsel for the appellant fell in the jurisdiction of the Union Council Ghari Usmani Khel therefore the situation was rectified on the departmental appeal of the appellant. Resultantly appellant was posted in GPS Nashorro Kandow, situated in his Union Council but that order was cancelled by way of political interference. This situation reveals that the appellant is posted in a school which does not fall in the jurisdiction of his Union Council which is evidently against the law of Khyber Pakhtunkhwa (Appointments, Deputation, Posting and transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011. The letter dated 03.12.2013 referred by learned counsel for the appellant also shows that the cancellation order was passed on the direction of the Chief Minister. As such the impugned cancellation order is defective which needs reconsideration. Since precious time of students is involved, therefore, the Tribunal would not directly interfere by setting-aside the impugned order. The Tribunal rather would refer the case to the competent authority to look into the matter in the light of Khyber Pakhtunkhwa (Appointments, Deputation, Posting and transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 within a time of one month after receipt of this judgment failing which the impugned order dated 31.10.2013 would be deemed to have been cancelled. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED
27.03.2015



(PIR BAKHSH SHAH)
MEMBER



(ABDUL LATIF)
MEMBER

1521/13

20.6.2014

Counsel for the appellant and AAG with Khursheed Khan, SO and Bashir Ahmad Headmaster for the respondents present. Rejoinder received. Copy handed over to the learned AAG. To come up for arguments on 25.09.2014.

MEMBER

MEMBER

25.09.2014

Counsel for the appellant and Mr. Muhammad Adeel Butt AAG with Bashir Ahmad, Head Master for the respondents present. The learned Member (Judicial) is not working due to a recent order of the Hon'ble Peshawar High Court, affecting his status as District & Sessions Judge. To come up for arguments on 22.12.2014.

MEMBER

22.12.2014

Clerk to counsel for the appellant and Mr Muhammad Jan, GP with Bashir Ahmad Head Master for the official respondents present. The Tribunal is incomplete. To come up for the same on 27.03.2015.

READER

15.1.2014

Since 14th January, 2014 has been declared as public holiday, therefore, case to come up for the same on 24.2.2014.


READER

24.2.2014

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Bashir Ahmad, Headmaster, Mosam Khan, AD and Khursheed Khan, SO for the official respondents present and requested for time. None is available on behalf of private respondent No.4. Fresh notice be issued to him. To come up for reply on main appeal as well as reply/arguments on stay application on 18.3.2014.


MEMBER

18.3.2014

Appellant in person and Muhammad Jan, GP with Khursheed Khan, SO and Bashir Ahmad, Headmaster for official respondents present and requested for time. None is available on behalf of private respondent No.4. Fresh notice be issued to him. To come up for written reply on main appeal as well as reply/arguments on stay application on 15.5.2014.


MEMBER


MEMBER

15.5.2014

Appellant with counsel, Mr. Muhammad Jan, GP with Bashir Ahmad, Headmaster for official respondents present and reply filed. None is available on behalf of private respondent No. 4 despite proper service, hence placed ex-parte. To come up for rejoinder on 20.6.2014.


MEMBER


MEMBER

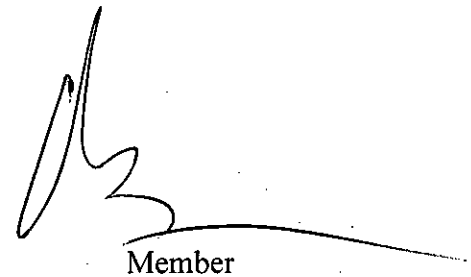
Mr. Jehanzeb

S.A No.1521/2013

13.12.2013

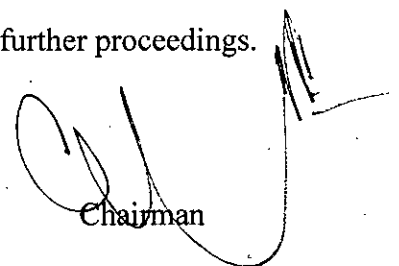
Counsel for the appellant present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned the order dated 31.07.2013, whereby he has been pre-maturely transferred in violation of law/rules regarding posting and transfer. Perusal of the record reveals that the appellant was pre-maturely transferred to GPS, Shah Haider Banda vide order dated 31.07.2013. Feeling aggrieved the appellant filed departmental appeal upon which an enquiry was conducted. Subsequently, the appellant was transferred to GPS, Nashoro Kandwo vide order dated 21.09.2013, however vide order dated 31.10.2013, the appellant transfer order was again canceled without any legal justification on the basis of political interference. Points raised at the Bar need consideration, the appeal in hand is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 14.01.2014. The appellant has also submitted an application for suspension of operation of impugned order dated 31.10.2013. Notice of application should also be issued to the respondents for the date fixed.

Appellant deposited
Process fee & Security
Rs. 1800/- Receipt
attached with file


Member

13.12.2013

This case be put before the Final Bench 15 for further proceedings.


Chairman

06.12.2013

Appellant with clerk of counsel for the appellant present and
requested for adjournment. To come up for preliminary hearing on
13.12.2013.





Member

Form - A
FORM OF ORDER SHEET

Court of _____

Case No. 1521/2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	19/11/2013	<p>The appeal of Mr. Jehan Zeb resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p align="right">  REGISTRAR </p>
2	22-11-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>6-12-2013</u></p> <p align="right">  CHAIRMAN </p>

The appeal of Mr. Jehan Zeb PSHT received today i.e. on 12.11.2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of departmental appeal against the impugned order dated 31/10/2013 and its rejection order are not attached with the appeal which may be placed on it.

No. 1642 /S.T,

Dt. 18/11 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
SHAWAR.

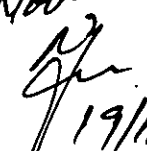
Mr. Noor Muhammad Khattak Adv. Pesh.

Note:

Sir,

Most likely it is stated that appellant has assailed the impugned order dated 31.7.2013 against which the appellant Departmental appeal on 5.8.2013. That on the said Departmental appeal the Respondent Deptt. Com. ducted an enquiry in the matter and in result the appellant was re-instated in BPS Nabarro. Kondow vide order dated 21.9.2013 but the said order was cancelled by Respondent No 3 vide order dated 31.10.2013. Moreover under the law and prevailing rules only one Departmental appeal is permissible. under

The case may very kindly be placed before the court.

Noor Muhammad Khattak
Adv.

19/11/13

BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO 1521 /2013

JEHAN ZEB

VS

Govt: of KPK

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	1- 3.
2.	Stay application	4.
3.	Up gradation order	A	5- 11.
4.	Transfer order	B	12- 13.
5.	Departmental appeal	C	14- 15.
6.	Inquiry report/letter	D	16.
7.	Order dated 21.9.2013	E	17.
8.	Charge report	F	18.
9.	Cancellation order	G	19.
10.	Notification dated 21.1.2013	H	20.
11.	Transfer/posting policy	I	21- 23.
12.	Transfer/posting Act 2011	J	24- 26.
13.	Vakalat nama	27.

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1521 /2013

Mr. Jehan Zeb, PSHT (BPS-15),
GPS Nashorro Kandow, District Malakand **APPELLANT**

VERSUS

A.W.S. Peshawar
Case No. 1550
Date 12/11/13

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa Peshawar.
- 2- The Director of (E&SE) Department, Khyber Pakhtunkhwa Peshawar.
- 3- The District Education Officer (M) Malakand at Batkhela.
- 4- Mr. Fazal Rabbani, PSHT (BPS-15),
GPS Shah Haider Banda, District Malakand
..... **RESPONDENTS**

EX-parte / 3-
15-5-14 / 4-

APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 31.7.2013 WHEREBY THE APPELLANT WAS TRANSFERRED PRE-MATURELY AND IN VIOLATION OF LAW AND PREVAILING RULES ABOUT TRANSFER/POSTING AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

12/11/13

PRAYER: That on acceptance of this appeal the impugned order dated 31.7.2013 and subsequent impugned order dated 31.10.2013 may very kindly be set aside and the respondents may be directed not transfer the appellant from GPS Nashorro Kandow till completion of his normal tenure. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

re-submitted to do
and filed.

19/11/13
R.SHEWETH:

- 1- That appellant is the employee of respondent Department and is serving as PSHT (BPS-15) quite efficiently and up to the entire satisfaction of his superiors.

- 2- That appellant has served the respondent Department as PST in far flung areas of District Malakand and has never been transferred to his home station during his entire service. That recently vide order dated 9.2.2013 the appellant was allowed up gradation from (BPS-14) to (BPS-15) as PSHT and was posted at GPS Zarif shah Banda which is near to his home station under the policy of the respondent Department Notification dated 21.1.2013. Copy of the order dated 9.2.2013 is attached as annexure **A.**
- 3- That astonishingly just after six months stay at GPS Zarif shah Banda the appellant was transferred pre maturely to GPS Shah Haider Banda vide order dated 31.7.2013. That feeling aggrieved the appellant filed Departmental appeal against the order dated 31.7.2013 with the contention that being senior most employee of the Department and under the policy above he should not be disturbed from GPS Zarif shah Banda. Copies of the impugned order and departmental appeal is attached as annexure **B & C.**
- 4- That on the said Departmental appeal of appellant the respondent Department conducted inquiry in the matter which ended in favor of the appellant vide dated 10.9.2013. That subsequently vide order dated 21.9.2013 the appellant was transferred to GPS Nashorro Kandow vice private respondent No.4. That in compliance the appellant took over the charge of the said post on 25.9.2013 and started performing his duty at the concerned school quite efficiently and up to the entire satisfaction of his superiors. Copies of the letter, order dated 21.9.2013 and charge report are attached as annexure **D, E and F.**
- 5- That respondent No.4 being blue eyed person to the local MPA of Tehsil Dargai was succeeded after the laps of one month and ten days by canceling the order dated 21.9.2013. Copy of the order is attached as annexure **G.**
- 6- That feeling aggrieved and having no other remedy appellant filed this appeal before this august Tribunal on the following grounds amongst the others.

GROUND:

- A- That the impugned orders dated 31.7.2013 and 31.10.2013 are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

- B- That the respondents has not been treated the appellant in accordance with law and rules and as such the respondents violated Article 4 and 25 of the Constitution of Pakistan 1973.
- C- That being senior to private respondent No.4 the appellant has the right to be adjusted near to his home under the law and prevailing rules of the Government of Khyber pakhtunkhwa.
- D- That the impugned orders dated 31.7.2013 and 31.10.2013 are against the Notification dated 21.1.2013 of the respondent Department. Copy of the Notification is attached as annexure **H.**
- E- That the impugned orders dated 31.7.2013 and 31.10.2013 are against the clause I, II and IV of the transfer posting policy of the Government of Khyber pakhtunkhwa. Copy of the transfer/posting policy is attached as annexure **I.**
- F- That the impugned order dated 31.7.2013 and subsequent order dated 31.10.2013 have not been issued by the respondents in the interest of public nor exigencies of service.
- G- That the impugned order dated 31.10.2013 has been issued in violation of the Principal of "**LOCUS POENITENTIAE**".
- H- That the impugned orders dated 31.7.2013 and 31.10.2013 are against the transfer/posting Regulatory Act 2011 of the provincial Government. Copy of the transfer/posting regulatory Act is attached as annexure **J.**
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT

Jehanzeb

JEHAN ZEB

THROUGH:

Noor

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO _____/2013

JEHAN ZEB

VS

Govt: of KPK

APPLICATION FOR SUSPENTION OF OPERATION
OF IMPUGNED ORDER DATED 31-10-2013 TILL
THE DISPOSAL OF THIS APPEAL

R/SHEWETH:

- 1- That the appellat filed above mentioned appeal along with this application before this august service Tribunal in which no date has been fixed so for.
- 2- That all the three ingredients necessary for the stay is in favor of the appellat.
- 3- That the transfer of the appellat is against the transfer policy of the Government of Khyber Pakhtunkhwa and the impugned transfer order dated 16-5-2013 is also pre-mature and politically motivated.
- 4- That the grounds of main appeal is also be considered as integral part of this application.

It is therefore humbly prayed that on acceptance of this application the order dated 31-10-2013 may very kindly be suspended till disposal of this appeal.

APPELLANT

Jehanzeb

JEHAN ZEB

THROUGH:

N.M. Khattak
NOOR MOHAMMAD KHATTAK
ADVOCATE

Registered

Malakand Tahsil
PRESIDENT
APTA Malakand Agency

Fatehullah
A-5

OFFICE OF THE DISTRICT EDUCATION OFFICER (M), MALAKAND AT BARKHELA.

NOTIFICATION.

Consequent upon recommendation of the District Promotion Committee in its meeting held on 15.01.2013, the following Senior Primary Schools Teachers-BPS No.14 are hereby upgraded to BPS No.15 (Rs.8500-700-29500) and adjusted against the Re-designated Posts of Primary School Head Teachers on the basis of Seniority cum fitness in pursuance of the Govt. of Khyber Pakhtunkhwa, Elementary and Secondary Education Department Notification No.SO(B&A)/-18/ E&SE/ 2012 Dated 11.7.2012 and in the light of its subsequent Notification No.SO(PE)4-5/SSRC/ Meeting/2012/ Teaching Cadre Dated 13.12.2012 with immediate effect.

Sr.No	Sr.No	Name	Father's Name	Present Place of Posting	School where posted as	Remarks
1	1	Khadim Mustafa	Said Sharif	GPS No. 1, Jalala	GPS No.1 Jalal	Already occupied post
2	4	Rahat Mand	Jehan Bakht	GPS Khar Banda	GPS Khar Banda	Already occupied post
3	5	Faramush	Fazli Rehman	GPS No.2 Barkhela	GPS No.2 Barkhela	Already occupied post
4	6	Rehman Hakim	Abdul Hakim	GPS Barkhela	GPS Barkhela	Already occupied post
5	8	Shah Wazir	Ahmad Khan	GPS Momin Korona	GPS Momin Korona	Already occupied post
6	10	Ghani Muhammad	Mehmood	GPS Habal Gram	GPS Habal Gram	Already occupied post
7	11	Fazli Qader	Qasim Khan	GPS Hisar Baba	GPS Hisar Baba	Already occupied post
8	12	Shamsul Qamar	Shah Zada Khan	GPS Police banda	GPS Police Banda	Already occupied post
9	17	Said Akram	Noor Hawas	GPS Aspur (Total)	GPS Aspur	Already occupied post
10	18	Abdul Mabood	Abdul Majid	GPS Baika	GPSs Baika	Already occupied post
11	21	Amir Zaman	Mirdaj	GPS Faisal Abad	GPS Faisal Abad	Already occupied post
12	22	Abdul Jamil	Umar Zaf	GPS Faizgar	GPS Faizgar	Already occupied post
13	23	Jehan Zeb	Muhammad Usman	GPS Koper	GPS Koper	Already occupied post
14	26	Akbar Khan	Sherin Taj	GPS Badama	GPS Badama	Already occupied post
15	27	Dost Muhammad	Ghulam Muhammad	GPS Mian Kalli	GPS Mian Kalli	Already occupied post
16	28	Umar Said	Rahman Said	GPS Qaidara	GPS Qaidara	Already occupied post
17	29	Habib Khan	Waris Khan	GPS Musa Maina	GPS Musa Maina	Already occupied post
18	32	Muhammad Islam	Muhammad Saad	GPS Meherdi	GPS Meherdi	Already occupied post
19	33	Ajmin Khan	Asaf Khan	GPS Kuz Khwar	GPS Kuz Khwar	Already occupied post
20	38	Fazli Rahman	Sher Hassan	GPS Gul Abad	GPS Gul Abad	Already occupied post
21	39	Saz Muhammad	Amir Muhammad	GPS Nela Rahi	GPS Nela Rahi	Already occupied post
22	40	Salis Khan	Aziz Khan	GPS No.2 Totakan	GPS No.2 Totakan	Already occupied post
23	41	Rahim Akbar	Shad Khan	GPS Janal Abad	GPS Janal Abad	Already occupied post
24	43	Badshah Rehman	Mian Rahman	GPS Naranji	GPS Naranji	Already occupied post
25	44	Abdul Wahab	Molvi Zarin	GPS No.2 Sakhakot	GPS No.2 Sakhakot	Already occupied post
26	45	Niaz Gul	Azeem Gul	GPS Dargai Phatak	GPS Dargai Phatak	Already occupied post
27	47	Abdul Qadar	Faqir Muhammad	GPS CC Thana	GPS CC Thana	Already occupied post
28	48	Amir Nawab	Amir Khan	GPS Hijab Kalli	GPS Hijab Kalli	Already occupied post
29	49	Atta Muhammad	Dost Muhammad	GPS Gunyar	GPS Gunyar	Already occupied post
30	50	Alzal Khan	Wasel Khan	GPS No.1 Sakhakot	GPS No.1 Sakhakot	Already occupied post
31	54	Mullan	Merajul Haq	GPS Baghdin Kalli	GPS Baghdin Kalli	Vice Jamshaid Khan
32	56	Fazli Yazdani	Fazli Rabbani	GPS G.Chaloor Banda	GPS G.Chaloor Banda	Already occupied post
33	58	Anwar Hussain	Said Gulab	GPS Sairiwar	GPS Agra	Vice Hour Muhammad
34	59	Muhammada Jan	Gul Nazir	GPS Margho	GPS Margho	Already occupied post
35	60	Muhammad Idnis	Mahajir Ullah	GPS Katwar	GPS Katwar	Already occupied post
36	61	Saraj Gul	Alam Zeb	GPS Para Khel	GPS Para Khel	Already occupied post
37	62	Khan Gulab	Gul Amin Khan	GPS Ghund Banda	GPS Ghund Banda	Already occupied post
38	63	Alam Zeb	Muhammad Shani	GPS Narai Uba	GPS Narai Uba	Vice Fazli Alam
39	65	Muhamd Yousaf	Fateh Hazrat	GPS Ghani Deri	GPS Ghani Dhedi	Already occupied post
40	66	Zarif Ahmad	Hijab Gul	GPS Badranga	GPS Badranga	Already occupied post
41	68	Fazal amin	Shah Siwar	GPS Zalam Kot	GPS Zalam Kot	Already occupied post
42	70	Dawa Khan	Paidar Khan	GPS No.2 Makhband	GPS No.2 Makhband	Already occupied post
43	71	Fateh Said	Abdul Waris	GPS Showara	GPS Showara	Already occupied post

ATTESTED

[Signature]

Handwritten notes on the left margin, including "Fazl" and "Said".

6

44	72	Said Bali	Sher Hamid	GMPS Mundai	GPS Bararo Sar No.2	Vice Muhammad Saeed
45	73	Azeem khan	Mubaras khan	GPS No.1, Jalala	GPS No.1 Baikhela	Vice Afzal Hussain
46	75	Dir Nawab Khan	Umara Khan	GPS Salanadaro Kali	GPS Standardo Kalli	Already occupied post
47	76	Said Muhammad	Batwar Khan	GPS Jalal Patti	GPS Jalal Patti	Already occupied post
48	78	Qabil Khan	Ajrum Khan	GPS No.1 Pirkhel	GPS Piliow Naranji	Vice Zahir Shah
49	79	Said Qasim	Muhabbal Shah	GPS Maizara Thana	GPS Maizara Thana	Already occupied post
50	80	Fazli Rabbi	Aslambol	GPS No.2 Tolakan	GPS Ghundai	Vice Said Alim
51	81	Ishaq Ahmad	Amir Muhammad	GPS No.2 Baikhela	GPSs Kalaito	Vice Muhammad Wadood
52	82	Khan Muhammad	Zar Muhammad	GPS Dargai Phatak	GPS Shawo Banda	Vice Raz Gul
53	83	Wakil Khan	Sangi Faras	GPS Hospital Colony Totalai	GPS HC Totalai	Already occupied post
54	84	Said Rehman	Mani Gul	GPS Thund	GPS Tund	Already occupied post
55	85	Muhammad Ishaq	Muhammad Essa khan	GPS Barawal	GPS Barawal	Already occupied post
56	86	Qanib-ur-Rahman	Ajun Said	GPS Soor Khal	GPS Soor Khal	Already occupied post
57	89	Mashahoor khan	Amin Gul	GPS Babagano Sar	GPS Babaagano Sar	Already occupied post
58	90	Aurang Zeb	Ali Haidar	GPS Haibal Gram	GPS No.2 Khar	Vice Burhan Shahzada
59	92	Liaq Khan	Qadar khan	GPS Gumbad	GPS Gumbad Agra	Already occupied post
60	93	Sanauallah	Aminullah	GPS No.2 Thana	GPS No.2 Thana	Already occupied post
61	94	Muhammad Iqbal	Muhammad Karam	GPS Maizara Thana	GPS No.Piran	Vice Shah Mulk
62	95	Arjumand khan	Chamni khan	GPS Inzargai	GPS Inzargai	Already occupied post
63	96	Muhammad Khan	Muhammad Amin	GPS Fazal Abad	GPS Fazal Abad	Already occupied post
64	99	Shad Muhammad	Ziarat Gul	GPS Naranji Banda	GPS Naranji Banda	Already occupied post
65	100	Muhammad Dawood	Bahram Shahzada	GPS Nawagai Banda	GPS Nawagai Banda	Already occupied post
66	102	Esal Muhammad	Feroz Khan	GPS Garang Dara	GPS Grang Dara	Already occupied post
67	103	Fazli Rabbi	Ghulam Haidar	GPS Gharib Abad Btk	GPS Gharib Abad	Already occupied post
68	104	Fazal Diyan	Fazalul Haq	GPS Baka	GPS Nan Tangi	Vice Zahid Hussain
69	105	Ghfar gul	Noor Afzal	GPS Hero Shah Kalan	GPS Hero Shah Kalan	Already occupied post
70	107	Faiz Muhammad	Sher Muhammad	GPS Kopar	GPS Show Kalli	Vice Muhammad Nabi
71	108	Noshad Khan	Mumtaz Khan	GPS Zormandi	GPS Zormandi	Already occupied post
72	111	Ajab Khan	Mahabal Khan	GPS Saidra Jowarr	GPS Khushal Korona	Vice Rahman Gul
73	112	Khwaja Moinuddin	Bad-e-uddin	GPS Meshra	GPS Mishta	Already occupied post
74	113	Muhammad Alam	Wadan Malak	GPS Hero Shah Kalan	GPS Kandow Haryankot	Vice Ali Gohar
75	114	Afzal Khan	Shah Zad khan	GPS Bar Tangai	GPS Bar Tangi	Already occupied post
76	115	Muhammad Irshad	Mashal	GPS Dri Sari	GPS Dri Sari	Already occupied post
77	116	Zar Gul	Naw Rooz	GPS Dara Totalai	GPS Dara Totalai	Already occupied post
78	117	Ihsanullah	Inyal Gul	GPS Saidra Jowarr	GPS Saidra Jowar	Already occupied post
79	118	Murad Ali	Mansoob Ali khan	GPS Haibal Gram	GPS Pinda Kandaro	Vice Wali Shah
80	120	Muhammad Iqbal	Ishtamand	GPS Zulam Kol	GPS Pinjin	Vice Muhammad Ilvas
81	121	Muhammad Jawad	Abur Razaq	GPS No.2 Baikhela	GPS Khaikay	Vice Muhammad Riz
82	122	Aziz Ahmad	Ghulam Muhammad	GPS Palai Banda	GPS Palai Banda	Already occupied post
83	123	Shah Roz	Noor Ahmad	GPS Alei Kali	GPS Alei Kali	Already occupied post
84	124	Muhammad Irshad	Yar Muhammad K	GPS Khankai Dheri	GPS Khankai Dheri	Already occupied post
85	125	Yousaf khan	Dad Khan	GPS Barh	GPS Brah	Already occupied post
86	126	Khaista Malik	Sher Malik	GPS Gharib Abad	Gh:Abad Malkani	Already occupied post
87	127	Fazli Mabood	Ajab Din	GPS No.1 Dobandai	GPS No.1 Dobandi	Already occupied post
88	128	Muhammad Ismail	Muhammad Abdullah	GPS Dessa	GPS Desa	Already occupied post
89	129	Jehan Zeb	Sher Afzal	GPS Standardo Kali	GPS Zarif Shah Baba	Vice Mursaleen
90	130	Muhammad Akbar	Muhammad Khan	GPS Nazir Abad	GPS Nazir Abad	Already occupied post
91	131	Muhammad Jamil	Abdul Malik	GPS Nal	GPS Nal	Already occupied post
92	132	Muzamil Shah	Mehbob Shah	GPS Gul Muqam	GPS Gul Muqam	Already occupied post
93	134	Rahat Gul	Hejab Gul	GPS Qadam Khela	GPS Qadam Khela	Already occupied post
94	135	Ghani Rehman	Qasim Jan	GPS No.2 Jalala	GPS Jalala	Already occupied post
95	136	Saeed Ahmad	Shefa Gul	GPS H Manan Korona	GPS H Manan Korona	Already occupied post

7 pages

ATTESTED

Malik Mohd Yaseen Zahere
PRESIDENT
 ANTA Malatand 2020

96	138	Nisar Ahmad	Fazli Akbar	GPS Shaba Khel	GPS Shaba Khel	Already occupied post
97	139	Painda Muhammad	Taj Muhammad	GPS Sarkai Bala	GPS Sarkai Bala	Already occupied post
98	140	Muhammad Zahoor	Muhammad Qasim	GPS Sind Ghara Bosaq	GPS Sind Ghari	Already occupied post
99	141	Muhammad Hayal	sher Zamin	GPS Mishta	GPS Khanori Banda	Vice Muslim Khan
100	143	Nisar Ahmad	Muhammad Sadra	GPS No.1, Palai	GPS No.1 Palai	Already occupied post
101	144	Mian Hussain	Gul Dad khan	GPS Mani Serai	GPS Mani Serai	Already occupied post
102	145	Yousaf Khan	Bakhtawar khan	GPS Kama Agra	GPS Kam Agra	Already occupied post
103	148	Rahman Gul	Said Gul	GPS No1 GU Khel	GPS GU Khel No. 1	Already occupied post
104	149	Yousaf Shah	Abdur Rahim	GPS No.1, Pirkhel	GPS No.1 Pirkhel	Already occupied post
105	150	Munawar Khan	Musafar Khan	GPS Qadani khela	GPS Wartair	Vice Naik Bahadar
106	151	Muhammad Yar	Shahriyar	GPS No.1 Pirkhel	GPS Kadow Mekhband	Vice Behroz Khan
107	152	Fazli Masood	Gul Habib	GMPS SIA NARANJI	GPS Alogai (S/P)	Vice Shah Zaman
108	154	Muhammad Raziq	Khan Nazeef	GPS Dargai P/House	GPS Dargai P/H	Already occupied post
109	156	Yousaf Shah	Noor Ahmad shah	GPS No.2, Pirkhel	GPS No.2 Pirkhel	Already occupied post
110	157	Amir Bahadur	Muhammad Hasan	GPS Abdul Karim B	GPS Abdul Karim Banda	Already occupied post
111	158	Habibullah	Zaib Shah	GPS Dobandai Banda	GPS Dobandi	Already occupied post
112	159	Syed Mujahid Shah	Syed Hussain Shah	GPS Hero Shah Kaln	GPS Hero Shah	Already occupied post
113	160	Nowsher Din	Umar Din	GPS Palai Banda	GPS Jalalpur	Vice Sabir Muhammad
114	161	Muzamil Shah	Khan Said	GPS Chargo Kali	GPS Chargo Kalli	Already occupied post
115	162	Muhammad Ali	Aseel Gul	GPS Ghound	GPS Ghund	Already occupied post
116	163	Lal Habib	Ghulam Hazrat	GPS Hazrat Abad Kadow	GPS Hazrat Abad	Already occupied post
117	164	Muntazim shah	Khadi khan	GPS Kharkai	GPS Kharkai	Already occupied post
118	165	Nisar Muhammad	Dost Muhammad	GPS No1 Dargai	GPS BNo.1 Dargai	Already occupied post
119	166	Badshah Hussain	Fazli Wahid	GPS No.2 D/Alid:	GPS No.2 Alladand	Already occupied post
120	167	Zahoor Muhammad	Bahrooz khan	GPS Gulshan Abad Bk	GPS Gulshan Abad	Already occupied post
121	168	Aziz-ur-Rahman	Biradar khan	GPS BAZargai	GPS Bazargai	Already occupied post
122	169	Hazir Muhammad	Amir Ahmad	GPS Haryan Kot	GPS Haryankot	Already occupied post
123	170	Fazli Hussain	Sharif Khan	GPS Palar Khpa	GPS Bama Bogarai	Against V.P.
124	171	Muhammad Younas	Rahmatullah Khan	GPS Dawa Khan Kali	GPS Dawa Khan Kalli	Already occupied post
125	174	Fazli Ghaffar	Fazli Subhan	GPS Malakand	GPS Malakand	Already occupied post
126	175	Mushk-e-Anbar	Zauta khan	GPS Faizghai	GPS Jai Kot	Vice Hafizirshad Ali
127	176	Ihsanullah	Muhammad Saeed	GPS Mir Ahmad Banda	GPS Mir Ahmad Banda	Already occupied post
128	177	Said Rahman	Wasiat Khan	GPS Jaban Dargai	GPS Jaban Dargai	Already occupied post
129	178	Syed Fazli Mula	Syed Karim Jan	GPS No.3 D/Alid:	GPS No.3 Alladand	Already occupied post
130	179	Bakhlur Rahman	Umar Khan	GPS Ziaratgi Shah	GPS Ziaratgi Shah	Already occupied post
131	180	Muhammad Nasim	Sher Muhammad	GPS Hejmb Kal	GPS Makhnawala No.1	Vice Samiul Haq
132	181	Muhammad Younas	Abdul Ghafar	GPS Chamyan Shah	GPS Chamyan Shah	Already occupied post
133	182	Muhammad Shoaib	Fazli Rahim	GPS CC Thana	GPS Chapai Thana	Vice Atta Muhammad
134	183	Ibrahim	Sultan Zaib	GPS Sangina	GPS Sangina	Already occupied post
135	184	Aziz-ur-Rahman	Amir Aman	GPS Kam Agra	GPS Maina Khanori	Vice Wazir Shah
136	186	Bakht Rawan	Ziarat Gul	GPS Qadar Kali	GPSs Qadar Kalli	Already occupied post
137	189	Muhammad Raziq	Muhammad Raliq	GPS Soni Ghara	GPS Soni Ghara	Already occupied post
138	190	Salimullah	Shah Zullah khan	GPS No.1, Pirkhel	GPS Lalu Patti	Vice Muhammad Jabbar
139	191	Muhammad Riaz	Bakhtawar khan	GPS Smaso Sar	GPS Smaso Sar	Already occupied post
140	192	Muhammad Nawaz	Khalid	GPS Zulam Kot	GPS Pirana	Vice Said Raziq
141	193	Amir Zada	Shah Zada	GPS Hisar Kalay	GPS Hisar Kalli	Already occupied post
142	194	Zia Muhammad	Fazal Ghani	GPS Julagram	GPS Jolaram	Already occupied post
143	195	Zahoor Ahmad	Dawlat Shah	GPS No2 Dargai	GPS No.2 Dargai	Already occupied post
144	196	Abdur Rashid	Umar Wahid	GPS No.1 Bararosar	GPS No.1 Bararo Sar	Already occupied post
145	197	Sabir Shah	Mian Said Abbas	GPS No.3 D/Alid:	GPS Rang Mala	Vice Muhammad Karim
146	198	Shawkat Ali	Sher Azeem	GPS Ghawar Kali	GPS Ghawar Kalli	Already occupied post
147	199	Masud Hassan	Badre Munair	GPS No1 Sakhakot	GPS Khan Garhi	Vice Muslim Khan
148	200	Sultan Room	Shah Zarin	GPS Dobandai No2	GPS No.2 Dobandi	Already occupied post
149	203	Gul Nabi	Nawab Khan	GPS Aspur Totai	GPS Kharchako Banda	Vice Bakht Gul

ATTESTED

Malik Mohd Yaseen
PRESIDENT
 ANTA Malakand Agency





150	207	Umar Karam	Noor Hawas	GPS JANDU	GPS Jando	Already occupied post
151	209	Sultan Muhammad	Gul Rahim	GPS Aamandara	GPS Amandara	Already occupied post
152	211	Nizam Ud Din	Aimuddin	GPS Ser Jala Kot	GPS Serai Jalakot	Already occupied post
153	212	Muhammad Gul	Mahmood Gul	GPS Kandi Khatak	GPS Kandi Khatak	Already occupied post
154	214	Rahmat Ghani	Sultan Said	GPS No.2, Pirkhel	GPS Doda Banda	Vice M.Yousaf Shah
155	215	Bismillah Jan	Shehriyar	GPS Haryankot	GPS Barh Ghakhi	Vice Zubair Shah
156	216	Muhammad Khan	Gul Qadar	GPS No.2 Kot	GPS No.2 Kot	Already occupied post
157	217	Muhammad Younas	Abdullah	GPS No.1, Kot	GPS No.1 Kot.	Already occupied post
158	219	Khani Mula	Said Mula khan	GPS Shinki	GPS Shinki	Already occupied post
159	224	Muhammad Faraz	Muhammad Salam	GPS No.1 D/Ald:	GPS No.1 Alladand	Already occupied
160	225	Ihsanullah	Aminullah	GPS No.1, Falai	GPS Karim Abad	Vice Mukhtarud-Din
161	227	Muhammad Rahim	Gul Rahim	GPS Gul Zada Kali	GPS Gul Zada Kalli	Already occupied post
162	228	Muhammad Zaman	Ali Haidar	GPS No.1, Pirkhel	GPSs No.1 Mekhiband	Vice Muhammad Bashir
163	229	Yousaf Ali	Sultan Muhammad	GPS Muhammad Amin	GPS M.Amin Kalli	Already occupied post
165	232	Shukat Hussain	Muhammad Nisar	GPS Said Abad	GPS Said Abad	Already occupied post
166	233	Nasir Ali	Fazli Akbar	GPS Akbar Abad Bik	GPS Akbar Abad	Already occupied post
167	234	Naqib Ahmad	Muhammad Hussain	GPS GMPS Hassan Abad	GPS Khanoni	Vice Ubaldullah
168	236	Mukamil Shah	Hanif Shah	GPS Muhammad Patti	GPS M Patti	Already occupied post
169	238	Shahi Room	Amir Zada	GPS No.2 Thana	GPS Kandaku	Vice S.Abdul Haq
170	240	Abdul Jalil	Abdur Rahman	GPS Hazrat Manan	GPS Aghi Garh	Vice Ibarur-Rehman
171	241	Khalista Muhamad	Gul Muhammad	GPS No1 Dargai	GPS Katabol	Vice Raza Khan
172	242	Jamshid Khan	MuhammadYousaf	GPS No2 Gulo Shah	GPS No.2 Gulo Shah	Already occupied post
173	243	Fazli Hadi	Ghulam Rasool	GPS Munawar Shah K	GPS Munawar Shah Kalli	Already occupied post
174	244	Anwar Khan	Bakhtawar	GPS Shari Abad	GPS Sharif Abad	Already occupied post
175	245	Farhad Gul	Murad Gul	GPS Naseemula Kali	GPS Nasimulah Kalli	Already occupied post
176	246	Qadar Khan	Gulab Khan	GPS Ashakai	GPS Ashakai	Already occupied post
177	247	Muhammad Sattar	Said Karim Jan	GPS No.3 D/Ald:	GPS Jalakot	Vice Zafar Malik
178	248	Ihsan Nabi	Said Hassan	GPS Akbar Abad	GPS Akhtar Ghundai	Against V Post.
179	249	Gul Ahmad Khan	Shah Didar	GPS Dargai Jaban	GPS Spero Gatti	Vice Hakim Khan
180	250	Munir Ali	Mir Zamin khan	GPS Zainai (Agra)	GPS Zainai Anra	Already occupied post
181	251	Muhammad Younas	Abdul Hanan	GPS No.1, Thana	GPS No.1 Thana	Already occupied post
182	252	Lajbar Khan	Akhtar Gul	GPS Dargai Phatak	GPS Khatako Shah	Vice Sabir Ahmad
183	253	Muhammad Qasim	Sahib Rahman	GPS Jharai	GPS Jhari	Already occupied post
184	254	Aslam Khan	Shamshere Khan	GPS Stanadaro Kali	GPS GPS Radad Kalli	Vice Fazli Mehmood
185	255	Fazli Sattar	Abdul Samad	GPS Bakhta	GPS Hatam Banda	Vice Said Karim
186	256	Noor Zada	Lal Zada	GPS Dargai Phatak	GPS Dewan Shah Baba	Vice Raidullah
187	257	Fida Hussain	Abdul Wans	GPS Dhanda	GPS Danda	Already occupied post
188	258	Qayum Khan	Sadullah Khan	GPS Hero Shah	GPS Mir Azam Korona	Vice Shah Said
189	259	M.Jehangir Khan	Raidar Muhammad	GPS No.1 Sakrakot	GPS Ahmad Goid Baada	Vice Asad Khan S. Mehmood Shah Inayat man.
190	260	Sharif Khan	Mashar Khan	GPS GPS H/C TOTAL	GPS Dhen Banda	Vice Saseedullah
191	261	Fazli Naeem	Fazli Khaliq	GPS Haibal Gram	GPS Sorana	Vice Raz Badshah
192	262	Fazli Rabani	Gulam Qadar	GPS Hero Shah	GPS Nashora Kandow	Vice Salim Khan
193	263	Manzoor Gul	Habib Gul	GPS Kopar	GPS Latif Kalli	Vice Fazal Rabbi
194	264	Abdul Ghafloor	Fakhru Islam	GPS Julagram	GPS Trai Serai	Vice Bazir Khan
195	265	Said Shah	Siana Gul	GPS Wazir Abad	GPS Wazir Abad	Already occupied post
196	266	Attaullah jan	Sher Bahadar	GPS Said Abad	GPSs Hadi Khas	Vice Amjad Ali
197	267	Sardar Ali	Muhammad Ali	GPS Faizghar	GPS Muna Shah	Vice Abdul Shakoor
198	268	Abdul Ghaffor	Khvidad khan	GPS Dessa	GPS Banjo	Vice Muhammad Ikram
199	269	Iqbal Hussain	Niamatullah	GPS Said Abad	GPS No.1 Prangi	Vice Muhammad Saddiq
200	270	Niamat Jalal	Sher Zaman	GPS Jughrai	GPS Jughrai Total	Already occupied post
201	271	AttaUr Rahman	Abdul Saleem	GPS Ghingrai Kalli	GPS Ghingrai	Vice Inayat Khan
202	272	Muhammad Zakaria	Gujar khan	GPS Qulangi	GPS Qulangi	Already occupied post
203	273	Hasanal	Sar Biland	GPS Qulanga	GPS Sa Shah	Vice Sultanud Din

ATTESTED

(Handwritten signature)

Pages

(Handwritten mark)



204	274	Muhammad Dawod	Muhammad Zuhair	GPS Ghundo Bala	GPS Ghundo Bala	Already occupied post
205	276	Zafar Khan	Muhammad Ali	GPS Akram Abad	GPS Akram Abad	Already occupied post
206	277	Usqat Ali	Saar Khan	GPS Karkani	GPS Karkani	Vice Ghani Khan
207	278	Azizullah	Mir Haidar Khan	GPS Arab Danda	GPS Arab Danda	Already occupied post
208	279	Salman	Muhammad Quresh	GPS Chirai	GPS Chirai	Already occupied post
209	281	Dir Muhammad	Abdul Jabar	GPS Plandara	GPS Plandara	Already occupied post
210	282	Ajmal Khan	Sangi Faras	GPS Tangai Khwar AGRA	GPS Tanagi Khwar Agra	Already occupied post
211	283	Rasool Ur Rehman	Ghulam Sarwar	GPS Serai Dheri Alladand	GPS Serai D/A	Already occupied post
212	284	Sardar Hussain	Noor Muhammad	GPS No.2 Palai	GPS No.2 Palai	Already occupied post
213	285	Ghulam Hussain	Ghulam Mustafa	GPS Said Abad	GPS Bazdara Payan	Against Vacant Post
214	286	Bashir ul Islam	Islam Murad	GPS Dhanda	GPS Ahmad Said Vice Asad Banda	
215	288	Farokh Shah	Ghalib Shah	GPS Hero Shah Kalan	GPS Jamo Banda	Vice Sajid Anwar
216	289	Makaiz Khan	Hakim Said	GPS Gumbad	GPS Spankharo (Kot)	Vice Sulman
217	290	Muslim Khan	Said Rahman	GPS Nari Dargai	GPS Sarogai	Vice Karimullah
218	291	Muhammad Ayub	Abdur Rahman	GPS Bagh Dheri	GPS Bagh Dheri	Already occupied post
219	292	Sherin Badshah	Gul Badshah	GPS Hospital Colony Totai	GPS Dukan Masjid	Vice sMuhamad Faqyaz
220	295	Muhammad Anam	Muhammad Ali Kh	GPS Hassan Abad	GPS Hassan Abad	Already occupied post
221	296	Muhammaad Yousaf	Jehangir Khan	GPS Julagram	GPS Gilo Ghundai	Vice Muhammad Rafiq
222	297	Amir Afzal	Sher Ghani Khan	GPS No.2 Totakan	GPS Dub Korona	Vice Bakht Zada
223	298	Hidayatullah	Shefa Gul	GPS Stanadaro Kali	GPS Ghamgin Abad	Vice Fazli Wahab
224	300	Muhammad Yousaf	Ziarat Gul	GPS Shah Dehrai	GPS Shah Dheri	Already occupied post
225	301	Muhammad Waris	Muhammad Sadiq	GPS Khairo	GPS Khairo	Already occupied post
226	302	Gul Karim	Walayat Khan	GPS Ghani Dheri	GPS Muqam Kalli	Vice Rafiullah
227	304	Abdul Lateef	Hafez Sherin	GPS Soorbat	GPS Soor Bat	Already occupied post
228	305	Malang Jan	Dost Muhammad	GPS Mir Akbar Khan B	GPS Sir A. Khan Banda	Already occupied post
229	306	Shah Zaman	Gul Fatin	GPS Hakim Abad	GPS Hakim Abad	Already occupied post
230	307	Muhammad Nawaz	Malook	GPS Gal Koto	GPS Gal Koto	Already occupied post
231	308	Fazal Malik	Fazal Khaliq	GPS Hisar Baba	GPS Sheikh Hassan Baba	Vice Safdar Hussain
232	309	Salar Muhammad	Rahim Gul	GPS No.2 Thana	GPS Rashaagai	Sabir Muhammad
233	310	Alta-ur-Rehman	Shakir Ullah Khan	GPS Hisar Kalay	GPS Baloo (Kot)	Vice Badshah Khan
234	311	Bashir Ahmad	Alel Gul	GPS Jharai	GPS Gujar Khan Dheri	Vice Hassan Idrees
235	312	Abdul Qasim	Durrani	GPS Qandara	GPS Salgaro Banda	Vice Noor Rehman
236	313	Amir Usman	Said Nazir	GMPS KOWAR JABBA	GPS Jughrai Khanori	Vice Anwar Khan
237	314	Haq Nawaz	Niaz Muhammad	GPS Gal Koto	GPS Mayar	Vice Mir Afzal
238	315	Hamish Gul	Saifullah Khan	GPS Hero Shah	GPS Anar Tanagi	Vice Mubbashir Mehmood
239	317	Ihsanullah	Ghulam Salik	GPS Jharai	GPS Malikhelo Wand	Vice Sher Ali
240	318	Ihsan Wali	Gul Wali	GPS Kas Korona	GPS Kas Korona	Already occupied post
241	319	M. Naeem Khan	Mamoor Khan	GPS Zari Shah Baba	GPS Shah Haidar B	Vice Sultan Rahim
242	320	Fazli Sattar	Harood Khan	GPS Kandi Khatak	GPS Ghundo Payan	Vice Bakht Rawan
243	321	Aminullah	Amirullah	GPS Zari Shah	GPS Mekhnawala No.2	Against VP vice M. Liza retired
244	323	Muhammad Naeem	Muhammad Roshan	GPS Qatam Khela	GPS Landlai Shah	Vice Hayat Khan
245	324	Altal Hussain	Sher Afzal	GPS Sher Khana	GPSs Sher Khana	Already occupied post
246	326	Shah Wazir Khan	Mohiud Din	GPS Mura Banda	GPS Mura Banda	Already occupied post
247	327	Habib Hassan	Muhammad Khan	GPS Adil Banda	GPS Adil Banda	Already occupied post
248	328	Javed Iqbal	Khalil Ullah	GPS Bakhta	GPS Shah Kot	Against V.P.
249	329	Muzafar Khan	Sher Muhammad	GPS Nasiruddin Korona	GPS Nasirud-Din Korona	Already occupied post
250	330	Farman Ali	Sher Azem	GPS Kaachi Koper	GPS Kaachi Koper	Already occupied post
251	331	Wali Muhammad	Khan Sherin	GPS Bajawo Kalli	GPS Bajawo Kalli	Already occupied post
252	332	Muhammad Naeem	Mushke Ambar	GPS Sellai Patti	GPS Dheri Kot	Vice Gul Amin
253	333	Muhammad Nafees	Khan Zada	GPS Palai Khpa	GPS Palai Khpa	Already occupied post
254	335	Fazli Rabi	Mira Jan	GPS Aspur Kandow	GPS Aspur Kandow	Already occupied post
255	336	Nisar Muhammad	Badshah Muhmd	GPS Latif Colony	GPS Latifi Colony	Already occupied post
256	337	Muhamad Yaseen	Ajab Noor	GPS Wazir Abad	GPS Khushal Garh	Vice Nisar Ahmad
257	339	Nazar Gul	Wazir Gul	GPS No.2 GU Khel	GPS No.2 GU Khel	Already occupied post
258	340	Asad Ullah	Sabir Khan	GPS No.1 Totakan	GPS No.1 Totakan	Already occupied post

7 pages

ATTESTED

Handwritten signature and text below the stamp.

259	343	Jamil khan	Mira Jan	GPS Dara Totai	GPS Barchari	Vice Muhammad Islam
260	344	Ghaus Rehman	Aslam khan	GPS Qulangai	GPS Karapa (Kol)	Vice Shamsur-Rehman
261	345	Nasar khan	Shah Wazir khan	GPS Adil Banda	GPS Koragh	Vice Suliman
262	346	Gul Faqir	Taza Gul	GPS Sadullah Khan B	GPS Sadullah Khan Banda	Already occupied post
263	347	Nazir Hussain	Aminullah	GPS Sher Khana	GPS Bazdara Bala	Vice Muhammad Wisal
264	348	Fazli Wahab	Aman Khan	GPS Sadullah Khan Kali	GPS Ter Kalli	Vice Gulistan Ahmad
265	350	Zakir Hussain		GPS No.2, Fandi	GPS Khog Dara	Vice Gauhar Rehman
266	351	Inayat khan	Akbar Said khan	GPS No.1 Totakan	GPS BaghDara	Vice Zahir Shah
267	352	Khan zaib	Aurang Zeb	GPS No.2, Mekhband	GPS Dara Maina (Kol)	Vice Arif Gul
268	353	Muhammad Nisar	Abdullah	GPS No.2 Thana	GPS Nakardara	Vice Liaq Shah
269	354	Usman Ali	Tooti	GPS No.2 Bogar cham	GPS No.2 Bogar Cham	Already occupied post
270	355	Sultan Mehmood	Wali Muhammad	GPS Jolagram	GPS Kasinal	Vice Fazli Ghaffar
271	356	Umar Farooq	Sultan Hussain	GPS Pharo	GPS Dhen	Vice Zahoor Ajhmad
272	357	Abdul Saboor	Abdul Kabir	GPS No.2, Pirkhel	GPSs Sholawai	Vice Muhammad Amin
273	359	Muhammad Parvez	Sher Alam	GPS Chinargai	GPS Chinargai	Already occupied post
274	361	Muhammad Islam	Amin khan	GPS Tangi khwar (inzargi)	Tangi Khwar Inzargai	Already occupied post
275	362	Muhammad Hanif	Gul Farooosh	GPS Police banda	GPS No.1 Khar	Vice Fazal Rauf
276	363	Haroon Rashid	Bahramand	GPS Ghurib Abad(Maikhani)	GPS Asghar Shah(Kol)	Vice Ijazur-Rehman
277	365	Faizul Mehmood	Syed Mubarak Shah	GPS Totai Tangai	GPS Totai Tangi	Already occupied post
278	367	Muhammad Iddress	Fazli Elahi Jan	GPS Upper Batkhela	GPS U/Batkhela	Already occupied post
279	368	Bashir Ahmad	Fazli Rehman	GPS Gunyar	GPS Gandero Sharif	Vice Said Khan
280	371	Sardar Muhammad	Ghulam Hadi	GPS Akbar Abad Btk	GPS Gumbad Batkhel	Against V.P.
P	372	Muhammad Jamil	Abdul Hasham khan	GPS No.1 Bogar Cham	GPS No.1 Bogar Cham	Already occupied post
282	373	Fida Hussain	Fazal Ghani	GPS Chinar Koto	GPS Chinar Koto	Already occupied post
283	374	Saifur Shah	Mian Badshah	GPS Said Abad	GPS Sahib Zada Baba	Vice Arshad
284	375	Muhammad Nisar	Haidar khan	GPS No.1 Thana	GPS Zangal Patti	Vice Israr Ahmad
285	377	Khadim Hussain	Perhaizgar	GPS Shab: khel	GPS Chapal	Vice Janat Gul
286	378	Hazrat kabir	Rahmat Ullah	GPS Matkani	GPS Matkani	Already occupied post
287	379	Fazli Raziq	Ghani Haidar	GPS Loya Banda	GPS Loya Banda	Already occupied post
288	381	Tauheed Ahmad	Aurang Zeb	GPS Shagai Amandara	GPS Shagai Amandara	Already occupied post
289	382	Noor Wahid	Muhammad Saleh	GPS Gero Shah	GPS Gero Shah	Already occupied post
290	383	Rafiqullah	Muhammad Khan	GPS Khairi	GPS Jabban Power House	Vice Gul Zada
291	384	Riazullah	Shakirullah	GPS Kanday Khatak	GPS No.1 Gulo Shah	Vice Umar Badshah
292	385	Hazir Muhammad	Dost Muhammad	GPS No2 Dargai	GPS Sharif Abad	Vice M.Arshad
293	386	Shaukat Ali	Abdul Washid	GPSD Sabil Banada	GPS Sabil Banda	Already occupied post
✓ 294	387	Saidar Ali Shah	Guhar Ali Shah	GPS Standaro Kali	GPS Hassan Korona	Vice Javed Iqbal
295	388	Ahmad Hussain	Said Usman	GPS No.3 Totakan	GPSs No.3 Totakan	Already occupied post
296	389	Ikram Muhammad	Ghulam Muhammad	GPS Jalawanon	GPS Jalawanon	Already occupied post

Note:-1-An undertaking to the effect that any overpayment if made to them as a result of incorrect up gradation of these PST to BPS No.15, the same will be made good by recovery from their pay/pension/gratuity should be obtained from them in their S/Books.

07 pages.

ATTESTED

MAJLIS HUKUMAT NEPAKISTAN
GOVERNMENT OF PUNJAB
APTA Matkani Agency

2- Necessary entry to this effect shall be made in their S/Books.

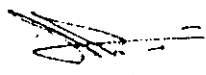
(MUSHTAQ AHMAD)
DISTRICT EDUCATION OFFICER (M),
MALAKAND AT BATKHELA.


760-1165
Endst: No. _____ / FNo. Upgradation of PSTs/Supdt:/DEO(M)/MKD Dated 9/02/2013

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

- 1- The Secretary, E&SE Department, Govt: of Khyber Pakhtunkhwa, Peshawar.
- 2- ✓ The Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
- 3- The Sub Divisional Education Officer (M), Swat Ranizai at Batkhela.
- 4- The Sub-Divisional Education Officer (M), Sama Ranizai at Dargai.
- 5- The District Accounts Officer, Malakand.
- 6- The Asstt: Programmer, DEMIS Cell, local office
- 7- ⁴⁰⁶598 All the Headteachers of the concerned Schools.

67 pages.




DISTRICT EDUCATION OFFICER (M),
MALAKAND AT BATKHELA.

Malik Mohd Yaseen Tahir
PRESIDENT
PTA Malakand Agency

ATTESTED



DISTRICT EDUCATION OFFICER(M), MALAKAND AT BATKHELA.ADJUSTMENT.

Consequent upon the recommendation of the DPC in its meeting held on 28.6.2013 appeals of the following aggrieved PSHT, SPSTs and PSTs found convincing on the basis of seniority against their posting made through this office order issued under Endst:No.760-1165 Dated 9.02.2013 is hereby accepted and the following adjustment are hereby made with immediate effect in the interest of public service.

S.No.	Sl.No. in the notification of 9.2.2013..	Name and Designation	Present place of posting	School where repatriated /adjusted	Remarks.
1	215	Shakil Ahmad, PST substitute of Mr. Farukh Shah	GPS Jamu Banda	GPS Hero Shah Kalan.	Vice Sajjad Anwar, PST repatriated to GPS Jamu Banda.
2	241	Muhammad Naeem, PSHT,	GPS Shah Haider Banda	GPS Zarif Shah Baba	Vice Jehanzeb, PSHT is adjusted at GPS Shah Haider Banda.
3	256	Nisar Ahmad, PST, Sr:No.746	GPS Standaro Kalli	GPS Khushal Garh	Vice Muhammad Iqbal Sr:No.982 adjusted at GPS Stanadaro Kalli.
4	266	Zahir Shah, PST, Sr:No.	GPS No.1 Totakan	GPS Bagh Dara	Vice Mr. Javid Iqbal is posted at GPS No.1 Totakan.
5	216	Suliman, PST Sr:No.	GPS Gumbad Agra	GPS Spinkharo Sharif	Vice Salman Khan, PST is posted at GPS Gumbad Agra.
6	107	Shah Zamin, PST Sr:No.	GMPS Sia Naranji	GPS Alogai	Vice Ismail Muhammad, PST is posted at GMPS Sia Naranji.
7	99	Musjim Khan, PST	GPS Mishta(Agra)	GPS Khanori Banda	Vice Wahid Muhammad, PST is posted at GPS Mishta(Agra).
8	68	Zahid Hussain, PST	GPS Baika Pirkhel	GPS Nari Tangi	Vice Fazal Haqani, PST is posted at GPS Baika Pirkhel

ATTESTED

[Handwritten Signature]

	Muhammad Bashir,PST	GPS No.1 Pirkhel	GPS No.1 Mekhband	Vice Wajid Ali,PST is posted at GPS No.1 Pirkhel.
276	Ijazur-Rehman,PST	GPS Gharib Abad, Matkani	GPS Asghar Shah	Vice Zaiwar Rehman,PST is posted at GPS Gharib Abad Matkani.
31	Jamshaid Khan,SPST	GMPS Nasar Abad	GPS Bagh Din Kalli	Vice Jamshaid Ali,PST is posted at GMPS Nasar Abad.
222	Bakht Zada,SPST	GPS No.2 Totakan	GPS Dub Korona	Vice Muslim Khan,PST is posted at GPS No.2 Totakan.
360	Shamsur-Rehman,PST	GPS Qulangi	GPS Karapa	Vice Muhammad Tahir PST is posted at GPS Qulangi.
145	Amir Afzal,PSHT	GPS Grang Dara	GPS Mayar	Vice Azam Khan,PST is posted at GPS Grang Dara.
135	Wazir Shah,SPST	GPS Kam Agra	GPS Maina Khanori	Vice Shahmin ,PST is posted at GPS Kam Agra.

Charge reports should be submitted to all concerned.
No TA/DA is allowed.

(ABDULLAH)

DISTRICT EDUCATION OFFICER(M),
MALAKAND AT BATKHELA.

No. 3788-3823 /F.No.Promotion of PST : DEOO(M)/MNKD Dated 31-07 /2013.

- Copy of the above is forwarded for information and necessary action to:-
- 1-The Director,E&SE, Khyber Pakhtunkhwa, Peshawar.
 - 2-The Distt:Accounts Officer, Malakand.
 - 3-The SDEO(M), Swat Ranizai at Batkhela.
 - 4-The SDEO(M), Sama Ranizai at Dargai.
 - 5-The Asstt:Programmer, DEMIS Cell local office.
 - 6-All the Headteachers of the concerned Schools.

DISTRICT EDUCATION OFFICER(M),
MALAKAND AT BATKHELA.

ATTESTED

حکومت پنجاب، ڈسٹرکٹ ایجوکیشن آفیسر، سردانہ ایسٹرنڈ بنگام بہاولپور

اپیل بر خلاف حکم / آرڈر صدرہ صدرہ 9/2/2013 کیس نمبر 760-1165 حکم / آرڈر

صدرہ صدرہ 31/7/2013 کیس نمبر 788-3823 ڈسٹرکٹ ایجوکیشن آفیسر، سردانہ

سر ڈسٹرکٹ بنگام بہاولپور متحدہ تبارک انٹرنیشنل پ-س-ٹ جہانگیرہ و لاہور تحصیل

سینارٹی نمبر 129 اسپرل بلز 89 درجہ 760-1165 جنوری 2013 جہانگیرہ پ-س-ٹ

مذکورہ بالا کی بالا حواز خلاف قانون اور خلاف قواعد و ضوابط حکم تعلیم کو اگلیت پر ایمری سکول استانہ دارو کا سے گو اگلیت پر ایمری سکول طرف شاہ بابا اور بعد ازاں گو اگلیت پر ایمری سکول طرف شاہ بابا سے گو اگلیت پر ایمری سکول شاہ خیر بادشاہ رضیہ گڑھی کشمیری محل با تہ ترتیب تبارک انٹرنیشنل کی تجا سے۔

جہاں علی۔ اپیل نہایت سائل سے زبردستی ہے

دراخت اپیل! یہ سائل ایڈوانٹ حکم تعلیم میں بحیثیت پی۔ ایس۔ ٹی ڈی ایس لرا بنگام سردانہ

ایڈوانٹ کو آرڈر صدرہ صدرہ 9/2/2013 کیس نمبر 760/1165 میں سینارٹی نمبر 129 پر حکم کیا گیا ہے جبکہ یونٹ کو نسل بہرہ شاہ میں ایڈوانٹ سینارٹی نمبر 27 ہے۔

(iii) ایڈوانٹ کو برٹ آرڈر صدرہ صدرہ 9/2/2013 صدرہ صدرہ بالا کو اگلیت پر ایمری سکول استانہ دارو کا سے گو اگلیت پر ایمری سکول طرف شاہ بابا خلاف قانون و خلاف

قواعد و ضوابط حکم تعلیم کے خلاف تبارک انٹرنیشنل حکم / آرڈر صدرہ صدرہ لکھیے | ATTESTED

۱۷) یہ کہ لیدر ان ایڈوانٹ کو بروئے حکم اردو ترجمہ صدرہ 31/7/2013 ڈسٹریکٹ ریجویشن آفیسر صاحب (درون) مددگار بنام بڑھتہ تقریباً 8 ماہ بعد دوبارہ گورنمنٹ پرائمری سکول طرف شاہ بابا سے گوانٹ پرائمری سکول شاہ بابا بلا جواز اور غیر قانونی طور پر اسٹریٹ لٹریچر (حکم مذکورہ کے تحت)

۱۸) یہ کہ ایڈوانٹ کو بروئے حکم صدرہ 9/2/2013 سناری لٹ 129 سرپل نمبر 89 ظاہر کیا گیا ہے ایس میں یونین کونسل پیر دستہ کے P.S.T فضل ابنی ولد منجم قادر سرپل نمبر 192 سنیاری نمبر 262 سے ظاہر کیا گیا ہے۔ لہذا اس طرح P.S.T محمد نسیم کو بروئے مذکورہ بلا سناری نمبر 319 سرپل نمبر 241 سے ظاہر کیا گیا ہے۔

۱۹) یہ کہ حسب قانون قواعد و ضوابط (Rules Regulation) ایڈوانٹ مذکورہ بالا دو لسان سے سٹیڈ قرار پایا ہے۔

۲۰) یہ کہ حکم تعلیم کے اعلیٰ حکام افسران نے حکم تعلیم کے قواعد و ضوابط کو نظر انداز کر کے محمد نسیم P.S.T کو بلا جواز اور غیر قانونی طور پر ایڈوانٹ کے بجائے گوانٹ پرائمری سکول شاہ بابا سے گوانٹ پرائمری سکول طرف شاہ بابا بلا جواز اور غیر قانونی طور پر اسٹریٹ لٹریچر (حکم مذکورہ کے تحت) سے ظاہر کیا گیا ہے۔

دوبارہ ایڈوانٹ : یہ کہ احکامات مذکورہ بالا تا حد تیار لم ایڈوانٹ خلاف قواعد و ضوابط

اور خلاف اونیٹیڈ ایگاریڈی اسٹیبلشمنٹ کے متعلق ہے۔

(۲۱) یہ کہ یہ دو احکامات تا حد تیار لم ایڈوانٹ

Misreading of non-reading record.

کامیاب ہے اس لیے قابل سوچ ہے۔

(۲۲) یہ کہ یہ دو احکامات مذکورہ بالا تا حد تیار لم ایڈوانٹ and Megality

material Megality کی ہے اس لیے قابل سوچ ہے۔

(۲۳) یہ کہ یہ دو احکامات مذکورہ بالا تا حد تیار لم ایڈوانٹ اور بلا جواز

ATTESTED

اس لیے قابل سوچ ہے

(3)

۱۷) یہ کہ حکام بالا محمد تعلیم نے ایڈوانٹ کی ٹرانسزرفر خفا کر فطرت الفقا
کے مسلم اصولوں کی بھی خلاف ورزی کی ہے اس لیے قابل سزا ہے

۱۸) یہ کہ ایڈوانٹ کو استوائی کا حوت بھی حرام نہیں کہا گیا ہے جو کہ مسلم اصولوں

No one will be condemned unheard. اس کے بھی منافع ہے اس لیے قابل سزا ہے۔

یہاں سزا کا یہ کہ فطرتی دلیل خدا پرورد احکامات

تحریر: صدر ۰۲/۲۰۱۳/۹ اور صدر ۰۳/۷/۲۰۱۳ ۳۱ بالہ شہ
تاج پور ایڈوانٹ خفا کا حکم صادر فرمایا ہے اور ایڈوانٹ کو یونین کونسل سپر وٹا
میں سینارٹ کے بنیاد پر کورٹنگ سپر وٹا سکول طرف شاہ بان یا کورٹنگ پر آئی
سکول ناسٹور و کنڈر یونین کونسل سپر وٹا ٹرانسفر بحال کرنے کا حکم
صادر فرمایا ہے نیز ڈیپارٹمنٹ جوسن الفقا و شریعت سے بھی ملتا
خفا ہے۔

خود ۰۳/۸/۲۰۱۳

ایڈوانٹ جہانزیب ولد شہزاد افضل (جوہ ای ایس۔ ٹی)
سائن یونین کونسل سپر وٹا مسلم آباد تحصیل ڈاؤن۔

Contact NO 03349307367
NEK MUNAMMAD
INQUIRY OFFICER

D-16

HEAD MASTER,
GOVT: HIGH SCHOOL
G.U.KHEL MALAKAND

NO: 3277 / DATED: 14/9/13
Contact no.03349307367

To,

The District Education Officer (M)
Malakand at Batkhela.

Subject:-

ENQUIRY/INVESTIGATION MUTUAL TRANSFER BETWEEN
MR. FAZAL RABBANI PST & MR. HAKIM KHAN PST.

R/Sir,

Reference your letter no. 4582-85/F.No.promotion of PST's dated: 23/8/2013.
Detail of the enquiry are as under:-

Sir, the teacher concerned were informed to be present on 03-9-2013
The under signed went through a complete impartial inquiry adopting the
Prevailing rules and regulations on mentioned date. Interviewed ~~the~~ questionnaire, The detail result
of the inquiry is as under:-

1. The appeal of the Jehanzeb is genuine and based on fact needs to be satisfy. His stay in various schools show that he is kept away from his house station.
2. Fazli Rabbani and Hakim Khan's statements are contradictory with the record provided to undersigned by the office further more Fazli Rabbani always make sacrifices for other though it is untrue and all statements is baseless hence amagment in the up gradation is more beneficial than cancellation of there mutual transfer.
3. The appeal of Mursalceen is baseless, as Mr. Jehan zeb or away other BPS 15 PST cannot his substituted.
4. Zarif Shah baba School has not been cleared in appellants appeals. Hence Muhammad Nacem is happy and serve in present station with satisfaction. Hence the undersigned requests to keep him on his own station.

Recommendation:- Actual proposal

S.No.	Name & Designation	Place of posting	Place to be adjusted	Remarks
1.	Jehab Zeb PST	Shah Haider Banda GU Khel	Kandow Heroshah	Appeal accepted & correction/Corrigendum
2	Fazal Rabbani	Nashorro Kondow	Shah Haider Banada	Already appeal accepted
3	Muhammad Nacem	Zarif Shah baba	Zarif Shah baba	Already ajusted
4 4	Hakim Khan	Zarif shah Baba	Stanadar Korrora	Appeal Rejected
5-	Mursalceen	StanadarKorrora		

Annexures and the detail of all annexure are as follow.

Annexure	:A - Jehanzeb PST
-do-	B Fazal Rabbani PST
-do-	C Hakim Khan PST
-do-	D Mursalceen PST
-do-	E Muhammad Nacem PST

14/9/13
Nek Muhammad Head Master
Enquiry Officer GHS G U Khel
(District Malakand.)

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MALAKAND AT BATKHELA.

ADJUSTMENT.

Consequent upon the recommendation of the inquiry officer vide his memo No.1072 dated 10-09-2013 and recommendation of the District Review committee, District Malakand, in its meeting held on 19-09-2013, appeals of the following aggrieved PSHTs, and SPSTs found convincing on the basis of seniority against their posting made through this office order issued under Endst: No. 760-1165 dated 09-02-2013 and Endst: No.3788-3823 dated 31-07-2013 is hereby accepted, and the following adjustment are hereby made with immediate effect in the interest of public service.

S.No	Name and Designation.	Present place of posting.	School where Posted/adjusted.	Remarks.
1.	Jehan Zeb PSHT B-15	GPS, Shah Haidar Banda.	GPS, Nashoro Kandwo.	V.S.No. 02
2.	Fazal Rabbani PSHT B-15	GPS, Nashoro Kandow.	GPS, Shah Haidar Banda	V.S.No. 01
3.	Muhammad Naeem PSHT B-15	GPS, Zarif shah Baba	GPS, Zarif shah Baba.	Alrerady adjusted.
4.	Hakim khan SPST B-14	GPS, Zarif shah Baba	GPS, Zarif shah Baba	Already adjusted.
5.	Mursaleen SPST B-14	GPS, Stanadaro Kalli	GPS, Stanadaro Kalli	Already adjusted.

Note:- No TA/DA is allowed.
Charge reports should be submitted to all concerned.

(ABDULLAH)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. 5278-91 / F.No.Promotion of PSTs (M) Dated 21-09 2013.

- Copy forwarded for information and necessary action to:-
1. The Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
 2. The District Accounts officer, Malakand.
 3. The Sub Divisional Education officer (Male) Sama Ranizai at Dargai.
 4. The Assistant Programmer, DEMIS, Cell local office.
 5. 9. The Head teachers concerned.
 - 10-14. The teachers concerned.

[Signature]
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

ATTESTED

[Signature]

چارج رپورٹ

میں نے گھانڑیہ P.S.H.A. سکول میں 15 دن کے عطلاتی آرڈر (91-278) کے

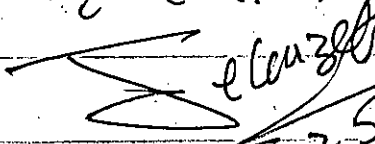
دوران 2013-9-21 کو ڈیوٹی سے ڈیوٹی DEO صاحب سے بطور

ضلع ملاکنڈ تحصیل از روپیہ G.P.S. ناشورکندہ کے لئے اپنے عہدے


کا مکمل چارج سنبھال لیا۔ نیز چارج رپورٹ عزیز فاروقی کے ذریعے ارسال

کرائی ہے۔

دستخط چارج کرنے والے


25/9/2013

دستخط چارج دینے والے


HEAD-TEACHER
GPS Nashorokandow
Malakand
25-9-2013

ATTESTED



6-19

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MALAKAND AT BATKHELA.

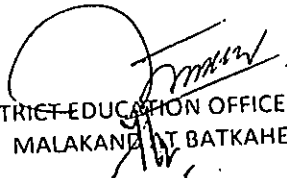
CANCELLATION ORDER.

Consequent upon the directives of the Secretary to Govt: of Khyber Pakhtunkhwa Elementary and secondary Education Department vide his office memo No.SO(PE) E&SED/2-1/Gen:Trn/2013 dated 01-10-2013 and directives of the Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar vide his office memo No. Nil dated 01-10-2013, the transfer /adjustment order of S.No.01 Mr. Jehan Zeb PSHT B-15 G.P.S. Nashoro kadow and S.No.02 Mr. Fazal Rabbani PSHT B-15 G.P.S. Shah Haidar Banda issued under this office order endst: No. 5278-91/ F.No.Promotion of PSTs (M) dated 21-09-2013 is hereby cancelled.

(MUHAMMAD MUTTAHIR)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. 6178-35 /F.No.Promotion of PSTs /DEO(M)MKD Dated 31-10 /2013.

- Copy forwarded for information and necessary action to:-
1. The Section officer (Primary) Govt: of E&SED Khyber pakhtunkhwa,Peshawar w/r to his office memo No.SO (PE) E&SED/2-1/ 2013 dated 01-10-2013.
 2. The Director Elementary and secondary Education,Khyber Pakhtunkhwa, Peshawar w/r to his office memo No. Nil dated 01-10-2013.
 3. The Sub Divisional Education officer (Male) Sama Ranizai at Dargai.
 4. The Agency Accounts officer, Malakand.
 5. The Assistant Programmer, DEMIS, Cell local office.
 6. 7. The Head teachers concerned.
 8. The teachers concerned.


DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

ATTESTED





**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936 0800-33857
No. 247-A // Promotion / Estab
Dated Peshawar the 27/01/2013.

7-19

All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-15 to Senior CT B-16, AT B-14 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization							
				SST B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	NQ	Callar	Chow
1	25258	GGPMS A (JICA)	205	1	2	0	2	3	1	1	1
2	25048	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1
3	25143	GGCMS C	473	1	0	0	2	3	1	1	1
4	30056	GGPS D	50	0	0	1	0	1	0	0	1
5	25224	GGPS E	110	0	0	1	1	1	0	0	1
6	25244	GGPS F	160	0	0	1	1	2	0	0	1
7	25277	GGPS G	198	0	0	1	1	3	0	0	1
8	25221	GGPS H	270	0	0	1	2	3	0	0	1
9	32912	GGPS I	285	0	0	1	2	4	0	0	1
10	25907	GGPS J	320	0	0	1	2	5	0	0	1
11	25138	GGPS K	380	0	0	1	2	6	0	0	1
12	32660	GGPS L	400	0	0	1	3	6	0	0	1
13	25275	GGPS M	440	0	0	1	3	7	0	0	1
Total			3250	3	4	10	23	50	3	3	13

Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chow
1	30056	GPS A	50	1	0	1	1
2	25221	GPS B	110	1	1	1	1
3	25144	GPS C	160	1	1	2	1
4	25277	GPS D	198	1	1	3	1

ATTESTED

5	25221	GPS E	240	1	2	3	1
6	32912	GPS F	285	1	2	4	1
7	25097	GPS G	320	1	2	5	1
8	25138	GPS H	360	1	2	6	1
9	32666	GPS I	400	1	3	6	1
10	25278	GPS J	440	1	3	7	1
Total			2563	10	17	38	10

Note:-

1. Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
2. There will be no post of PSHT B-15 & SPST B-14 in MPS.
3. No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

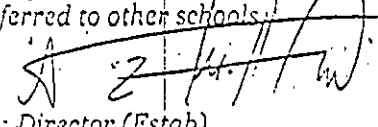
Posting on Promotion

1. On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs Subject to the provisions of sanctioned post.
2. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
3. In their promotion order it should be mentioned that their Inter-se-Seniority on lower post will remain intact.
4. If anyone forego promotion, Entry to this effect may be made in his/her Service book.
5. Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

1. On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools.
2. 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level.
3. No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
4. Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.

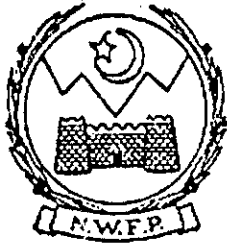
5.


Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. / File No. 1/A-68/KC/S.list : Dated Peshawar the 18/01/2013.

- Copy forwarded for information and necessary action to the:-
1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 3. M/File

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



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

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) ¹{ }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained

²While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.

- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.

- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

ATTESTED

ATTESTED

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

² Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement
¹DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

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

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

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

Mmm
ATTESTED

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

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

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

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

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

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

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

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

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

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

ATTESTED

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

ATTESTED

Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011

AN ACT to regulate by law appointments, postings and transfers of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities.

Preamble.---WHEREAS it is expedient to regulate by law appointments, postings and transfers at local level, of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities and to ensure the availability of teachers in schools, lecturers in colleges and instructors in technical institutions and the doctors in health facilities, and to regulate deputation of doctors abroad, and to provide for matters connected therewith or ancillary thereto;

It is hereby enacted as follows:

1. Short title, application and commencement.---(1) This Act may be called the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011.

(2) It shall apply to teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges as well as commerce colleges and instructors serving in technical institutions and doctors serving in the health facilities in the Province of the Khyber Pakhtunkhwa.

(3) It shall come into force at once.

2. Definitions.---(1) In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say,-

- (a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;
- (aa) "college" means a degree college;
- (b) "doctor" means a doctor serving in the health facility;
- (c) "Government" means the Government of the Khyber Pakhtunkhwa;
- (d) "health facilities" mean all health facilities established and managed by Government to provide medical facilities to general public;
- (e) "lecturer" and "instructor" respectively means a lecturer or an instructor serving in a Technical Institution as well as in a college, as the case may be;
- (f) "prescribed" means prescribed by rules made under this Act;

(2) meanings or any oth

3. (1) The va the Union Identity Ca available v amongst ei

Pro adjacent U vacant posi

(2) to the schc availability c

(3) Union Counri subject to th

(4) commencem appointed p Councils or a

4. and teach authorities m instructors, s district conce arrival of rec

ATTESTED

of giving wide publicity in the press. On assumption of charge of post by recommendee of the Commission, the services of such ad hoc appointee shall stand automatically terminated:

Provided that if no suitable and eligible candidate is available in the district concerned for appointment, then the candidates belonging to the neighbouring districts shall be considered for appointment in the order of their merit.

(2) Save as the appointment made under proviso of this section, "ad hoc appointee" shall serve in the district of his domicile.

(3) The post of a doctor, lecturer, instructor, subject specialist or teacher who proceeds on training or long leave may be treated as vacant post for the purpose of contract or contingent appointment till the return of such employee from training or long leave and assumption of charge of the post:

Provided that the period of such training or long leave shall not be less than one year and no appointment on contract or contingent shall be made on the post which may fall vacant for a period less than one year.

5. **Initial posting.** --- (1) The doctors, lecturers, instructors subject specialist or teachers, upon their appointment shall be first posted in the periphery of the zone against whose quota they have been recruited, and they shall not be transferred for a period of at least three years.

(2) Upon expiry of the tenure as referred to in sub-section (1), transfer shall be made only upon the availability of substitute.

6. **Deputation of Doctors.**---(1) Government may allow deputation abroad for all categories of doctors only once in their entire service, for a period not exceeding three years.

(2) Deputation to "Foreign Service" within Pakistan shall be permissible only in respect of medical officers for a period not exceeding three years:

Provided that no further extension, on expiry of agreed tenure shall be given to the doctors who are already on deputation abroad or within Pakistan.

7. **Postgraduate Medical Education.**---(1) The Health Department, on the basis of objective need assessment and analysis, shall determine the intake number of Trainee Medical Officers (TMOs) in Postgraduate Medical Institute (PGMI) and Junior Registrars in Tertiary Care Hospitals every year. This stipulated number shall not exceed in any case.

(2) Any doctor selected or permitted for postgraduate medical training shall be treated on leave without pay and may be entitled only for stipend fixed by Government from time to time for such training.

(3) A doctor selected or permitted for postgraduate medical training shall provide surety bond prescribed by Government ensuring that upon completion of his studies for which he was initially selected, shall compulsorily serve for three years in the district of

his
for th

of two

notice
from hi

The pr
lecturer

notwith

Civil Se
Pakhtun
Tribunal
undertak
be calle
respect c
by or unc

removal c

purposes

1PO

i) All
ab

ii) All
pro
cho

1. Pos

- (g) "rules" mean the rules made under this Act;
- (h) "school" means school in the public sector including primary, middle, secondary school, higher secondary school or an institution of equivalent level imparting education through any system or medium of instruction in the public sector;
- (i) "teacher" means a teacher of primary, middle, secondary or higher secondary school; and
- (j) "technical institution" means and includes a Commerce College or Government College of Management Sciences or Technical Institute or Technical and Vocational Training Center or Skill Development Center in the public sector imparting technical education to students leading to the award of a degree or a diploma or a certificate.

(2) Words and phrases used in this Act, but not defined, shall have the same meanings as respectively assigned to them under the relevant federal law or provincial law or any other statutory order or rules for the time being in force.

3. Appointment, posting and transfer of primary school teachers.---

(1) The vacancy of primary school teacher shall be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their Computerized National Identity Card and domicile, on merit and if no eligible candidate in that Union Council is available where the school is situated, such appointment shall be made on merit from amongst eligible candidates belonging to the adjacent Union Councils:

Provided that on availability of a vacancy, a primary school teacher, appointed from adjacent Union Council, as referred to in this sub-section, shall be transferred against a vacant post in a school of the Union Council of his residence within a period of fifteen days.

(2) Upon marriage, the primary school teacher on request may be transferred to the school in the Union Council, where his spouse, ordinarily resides, subject to the availability of vacancy.

(3) The primary school teacher shall be transferred to other school within the Union Council on completion of tenure as may be prescribed or before completion of tenure, subject to the policy of rationalization for maintaining certain students teachers ratio, if any.

(4) Government shall, within a period not exceeding one year of the commencement of this Act, make arrangement for posting of all the primary school teachers appointed prior to coming into force of this Act, to the schools of their respective Union Councils or adjacent Union Councils, as the case may be.

4. Appointment of doctors, lecturers, instructors, subject specialists and teachers on adhoc basis.---(1) Government may, through the competent authorities make adhoc appointment on merit against the vacant posts of doctors, lecturers, instructors, subject specialists and teachers, falling within the purview of Commission, in a district concerned from the domicile holders of that district for a period of one year or till the arrival of recommendees of Commission which

ATTESTED

his domicile and in case of non-availability of a post in the district of domicile, he shall serve for three years in the rural area.

(4) For the purpose of sub-section (3), the doctor shall also provide guarantee of two government officers.

(5) In case of violation of sub-section (3), Government shall serve one month notice upon the doctor for resumption of duty, failing which the amount shall be recovered from him or from the guarantor, as the case may be.

8. Provisions relating to doctors apply to lecturers and instructors. --- The provisions relating to doctors in section 7 of this Act shall mutatis mutandis apply to lecturers and instructors.

9. Act to over-ride other laws.---The provisions of this Act shall have effect notwithstanding any thing contained in any other law for the time being in force.

10. Jurisdiction barred.---Save as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 and the Khyber Pakhtunkhwa Service Tribunal Act, 1974 (Khyber Pakhtunkhwa Act No. I of 1974), no order made or proceedings undertaken under this Act, or the rules made there under or any officer authorized by it shall be called into question in any Court, and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance or by any power conferred by or under this Act or the rules.

11. Removal of difficulties.---Government may, by order, provide for the removal of any difficulty which may arise in giving effect to the provisions of this Act.

12. Power to make rules.---Government may make rules for carrying out the purposes of this Act.

GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION DEPARTMENT
(Regulation Wing)

1 POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.

Posting - Transfer Policy - updated till 10 Jan, 2009

ATTESTED



VAKALATNAMA

IN THE COURT OF KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No/ _____ OF 2013

MR. JEHAN ZEB

(APPELLANT) ✓
(PLAINTIFF)
(PETITIONER)

VERSUS

EDUCATION DEPARTMENT

(RESPONDENT) ✓
(DEFENDANT)

I/we MR. JEHAN ZEB

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

Dated. _____/_____/2013

Jehan Zeb
CLIENT

N.M. Khattak
ACCEPTED
NOOR MOHAMMAD KHATTAK
(ADVOCATE)

OFFICE:

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

Phone: 091-2211391

Mobile No.0345-9383141

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA PESHAWAR

Service Appeal No1521/2013

Mr. Jehan Zeb PST GPS Nashro Kandow Malakand Agency.

(Appellant)

VERSUS

1. The secretary to Govt of Khyber Pakhtoonkhwa Elementary and secondary Education Peshawar
2. The Director Elementary & Secondary Education, Khyber Pakhtoonkhwa, Peshawar.
3. The District Education Officer (Male) Malakand at Batkhela.
4. Mr. Fazal Rabbani, PSHT (BPS-15) GPS, Shah Haidar Banda, District Malakand.

.....(Respondents)

Para wise comments on behalf of respondents no 1-3

Respectfully Sheweth
Preliminary Objections.

1. That the Appellant has not come to this august court with clean hands..
2. That the appellant has got no cause of action..
3. That the appellant is incompetent in its present form..
4. That the appellant is estopped by his own conduct to file the instant appeal.
5. That the instant appeal is infructious and barred by law.

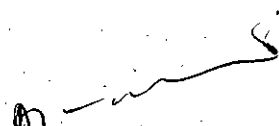
FACTS.


- 1 Pertains to record hence no comments.
2. Pertain to record hence no comments.
3. In reply to para 3 it is submitted that on the acceptance of appeal of aggrieved Mr. Muhammad Naeem PSHT BPS-15 GPS Shah Haider Banda by the Departmental promotion committee, the appellant (Mr. Jehan Zeb PSHT BPS-15 adjusted at GPS Shah Haider Banda vice Muhammad Naeem PSHT BPS -15 vide order endst: No 3788-3823 dated 31-07-2013 (Copy of order annexed as annexure B)
4. In reply to para 4 it is submitted that an enquiry was constituted to conduct enquiry in the matter and submit his finding/report. The enquiry officer conducted enquiry in the matter and submit his recommendation and proposal to adjust the appellant at GPS Nashoro Kandow .The District Review Committee, Malakand agreed with the proposal/recommendations of the enquiry officer and the appellant was adjusted at GPS Nashoro Kandow on the recommendation/proposal of the enquiry officer and District Review Committee, Malakand vide order endst: No 5278-91 Dated 21-09-2013. (Copy of order and DRC annexed ad annexure C and D)
5. Incorrect. That the orders dated 31-09-2013 was cancelled vide office order Endst: No.6178-85 dated 31-10-2013 which is according to law and rules.
6. Incorrect The appellant has got no cause of action and this appeal is liable to be dismissed on the following grounds.


GROUND.

- A. Incorrect, that the orders dated 31-7-2013 and 31-10-2013 were issued under the rules policy, facts and according to natural justice.
- B. Incorrect, the appellant was treated in accordance with law, rules and respondents have not violated articles of constitution.
- C. Incorrect, the appellant was promoted from SPST BPS-14 to PSHT BPS-15 and adjusted on the basis of seniority nearest to his home station.
- D. Incorrect, Both the orders were issued on the recommendation/direction of the Departmental promotion committee/Departmental Review Committee.
- E. Incorrect, As explained in Para (D) above.
- F. Incorrect, the impugned order dated 31-07-2013 and subsequent order dated 31-10-2013 have been issued by the competent authority and are according to law and rules on the subject.
- G. Incorrect, the principle of LOCUS POENITENTIAE have not been violated As per section 10 of civil servant Act, He is bound to serve any where.
- H. Incorrect .The impugned orders are according to law and rules .
- I. As That the respondent seek permission to advance other grounds and proof at the time of arguments.

It is therefore most humbly prayed that the instant appeal may be dismissed with cost.


**SECRETARY,
E&SE DEPARTMENT,
GOVT.OF KHYBER PAKHTUNKHWA
AT PESHAWAR (RESPONDENT NO1)**


**Signed on behalf of
DIRECTOR,
E&SE DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR.
(RESPONDENT NO.2)**


**DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.
(RESPONDENT NO.3)**

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWAW PESHAWAR

Service Appeal No 1521/2013

**Mr. Jehan Zeb PST (BPS-15)
GPS Nashoro Kandow Malakand Agency**


(Appellant)

VERSUS

Govt of Khyber Pakhtoonkhwa & others (Respondents)

COUNTER AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that all the contents of the accompanying parawise comments are true and correct to the best of my knowledge and belief and all the coddle formalities were fulfilled.


**District Education Officer
(M) Malakand at Batkhela.**

OFFICE OF THE DIRECTOR, ELEMENTARY & SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

All the Executive District Officers (Elementary & Secondary) Education, in Khyber Pakhtunkhwa, are hereby **authorized** to appear before the learned Khyber Pakhtunkhwa, Service Tribunal, Peshawar, Camp court at Abbottabad, D.I.Khan, Mingora at Swat as well as Hon'able Peshawar High court Peshawar, Abbottabad bench, D.I.Khan bench, Bannu bench, Dar Ul Qaza Mingora at Swat & August Supreme Court Of Pakistan, at Islamabad & Peshawar bench where, **the Executive District Officer (E&SE) concerned as well as District Coordination Officer is competent authority in case of BS-01 to BS-15 (District Cadre Posts) on behalf of Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.**

The Executive District Officers Elementary & Secondary Education, in Khyber Pakhtunkhwa are also directed to prepare para wise comments in case of (BS-01 to BS-15) where the EDO concerned is competent authority & signed the same on behalf of Director, Elementary & Secondary Education, Khyber Pakhtunkhwa & also attend the relevant courts on each hearing date positively. In case of failure the EDO, (E&SE) concerned will be personally responsible for any consequences.

The requisite report of court cases must be furnished to this Directorate on each of 5th month separately, i.e. Peshawar High Court, Service Tribunal, Civil suit cases & Supreme Court of Pakistan cases.

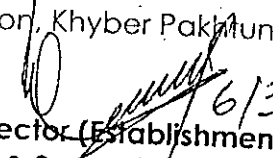
Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst:No. 1407-73

Dateel - 7/3/2012

Copy forwarded for information to the:-

1. Additional Registrar Peshawar High Court Peshawar.
2. Additional Registrar, Peshawar High Court Abbottabad Bench.
3. Additional Registrar, Peshawar High Court D.I.Khan Bench.
4. Additional Registrar, Peshawar High Court Bannu.
5. Additional Registrar, Peshawar High Court Mingora/Swat Bench
6. Additional Advocate General Khyber Pakhtunkhwa, Abbottabad Bench.
7. Additional Advocate General Khyber Pakhtunkhwa, D.I.Khan Bench
8. Additional Advocate General Khyber Pakhtunkhwa, Bannu Bench.
9. Additional Advocate General, Khyber Pakhtunkhwa, Mingora/Swat Bench
10. Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar.
11. Additional Advocate General, Khyber Pakhtunkhwa, Service Tribunal Peshawar.
12. Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
13. Special Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 14-38. All District Coordination Officers concerned
- 39-64. All Executive District Officers (Elementary & Secondary) Education in Khyber Pakhtunkhwa for strict compliance.
65. Assistant Director (Litigation-II) Local Directorate.
66. PA to Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.


Deputy Director (Establishment)
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

OFFICE OF THE DISTRICT EDUCATION OFFICER(M), MALAKAND AT BATKHELA.

Annexure A

NOTIFICATION.

Consequent upon recommendation of the District Promotion Committee in its meeting held on 15.01.2013, the following Senior Primary Schools Teachers-BPS No.14 are hereby upgraded to BPS No.15 (Rs.8500-700-29500) and adjusted against the Re-designated Posts of Primary School Head Teachers on the basis of Seniority cum fitness in pursuance of the Govt: of Khyber Pakhtunkhwa, Elementary and Secondary Education Department Notification No.SO(B&A)/1-18/ E&SE/ 2012 Dated 11.7.2012 and in the light of its subsequent Notification No.SO(PE)4-5/SSRC/ Meeting/2012/ Teaching Cadre Dated 13.12.2012 with Immediate effect.

Sl.No	Sr.No	Name	Father's Name	Present Place of Posting	School where posted as Pry:School HT	Remarks
1	1	Khadim Mustafa	Said Sharif	GPS No.1, Jalala	GPS No.1 Jalal ✓	Already occupied post
2	4	Rahat Mand	Jehan Bakht	GPS Khar Banda	GPS Khar Banda	Already occupied post
3	5	Faramosh	Fazli Rehman	GPS No.2 Batkhela	GPS No.2 Batkhela	Already occupied post
4	6	Rehman Hakim	Abdul Hakim	GPS Bakhla	GPS Bakhla ✓	Already occupied post
5	8	Shah Wazir	Ahmad khan	GPS Momin Korona	GPS Momin Korona	Already occupied post
6	10	Ghani Muhammad	Mehmood	GPS Haibat Gram	GPS Haibat Gram ✓	Already occupied post
7	11	Fazli Qader	Qasim khan	GPS Hisar Baba	GPS Hisar Baba ✓	Already occupied post
8	12	Shamsul Qamar	Shah Zada khan	GPS Police banda	GPS Police Banda	Already occupied post
9	17	Said Akram	Noor Hawas	GPS Aaspur (Total)	GPS Aspur ✓	Already occupied post
10	18	Abdul Mabood	Abdul Majid	GPS Baika	GPSs Baika ✓	Already occupied post
11	21	Amir Zaman	Mirdad	GPS Faisal Abad	GPS Faisal Abad ✓	Already occupied post
12	22	Abdul Jamil	Umar Zad	GPS Faizghai	GPS Faizghai	Already occupied post
13	23	Jehan Zeb	Muhammad Usman	GPS Koper	GPS Koper	Already occupied post
14	26	Akbar khan	Sherin Taj	GPS Badama	GPS Badama ✓	Already occupied post
15	27	Dost Muhammad	Ghulam Muhammad	GPS Mian Kalli	GPS Mian Kalli	Already occupied post
16	28	Umar Said	Rahman Said	GPS Qaidara	GPS Qaidara	Already occupied post
17	29	Habib Khan	Waris Khan	GPS Musa Maina	GPS Musa Maina	Already occupied post
18	32	Muhammad Islam	Muhammad Saeed	GPS Meherdi	GPS Meherdi	Already occupied post
19	33	Ajmin khan	Asaf khan	GPS Kuz Khwar	GPS Kuz Khwar ✓	Already occupied post
20	38	Fazli Rahman	Sher Hassan	GPS Gul Abad	GPS Gul Abad ✓	Already occupied post
21	39	Saz Muhammad	Amir Muhammad	GPS Nek Rahi	GPS Nek Rahi ✓	Already occupied post
22	40	Salis khan	Aziz khan	GPS No.2 Totakan	GPS No.2 Totakan ✓	Already occupied post
23	41	Rahim Akbar	Shad Khan	GPS Janat Abad	GPS Janat Abad	Already occupied post
24	43	Badshah Rehman	Mian Rahman	GPS Naranjai	GPS Naranji ✓	Already occupied post
25	44	Abdul Wahab	Molvi Zarin	GPS No2 Sakhakot	GPS No.2 Sakhakot	Already occupied post
26	45	Niaz Gul	Azeem Gul	GPS Dargai Phatak	GPS Dargai Phatak	Already occupied post
27	47	Abdul Qader	Faqir Muhammad	GPS CC Thana	GPS CC Thana ✓	Already occupied post
28	48	Amir Nawab	Amir Khan	GPS Hijab Kali	GPS Hijab Kalli	Already occupied post
29	49	Atta Muhammad	Dost Muhammad	GPS Gunyar	GPS Gunyar ✓	Already occupied post
30	50	Afzal Khan	Waset Khan	GPS No.1 Sakhakot	GPS No.1 Sakhakot	Already occupied post
31	54	Multan	Merajul Haq	GPS Nasar Abad	GPS Baghdad Kalli	Vice Jamshaid Khan
32	56	Fazli Yazdani	Fazli Rabbni	GPS G.Ghafor Banda	GPS G.Ghafor Banda	Already occupied post
33	58	Anwar Hussain	Said Gulab	GMPS Sarkawai	GPS Agra ✓	Vice Noor Muhammad
34	59	Muhammada Jan	Gul Nazir	GPS Maragho	GPS Margho ✓	Already occupied post
35	60	Muhammad Iddris	Mahajir Ullah	GPS Katwai	GPS Katwai ✓	Already occupied post
36	61	Sartaj Gul	Alam Zaib	GPS Paro Khel	GPS Paro Khel ✓	Already occupied post
37	62	Khan Gulab	Gul Amin khan	GPS Ghound Banda	GPS Ghound Banda ✓	Already occupied post
38	63	Alam Zeb	Muhammad Sharif	GMPS Jabagai	GPS Narai Uba	Vice Fazli Alam
39	65	Muhad: Yousaf	Fateh Hazrat	GPS Ghani Deri	GPS Ghani Dhedri	Already occupied post
40	66	Zarif Ahmad	Hijab Gul	GPS Badragga	GPS Badragga	Already occupied post
41	68	Fazal amin	Shah Sawar	GPS Zalam Kot	GPS Zalam Kot ✓	Already occupied post
42	70	Dawa Khan	Paldad khan	GPS No.2, Mekhband	GPS No.2 Mekhband ✓	Already occupied post
43	71	Fateh Said	Abdul Waris	GPS Showara	GPS Showara ✓	Already occupied post

7 pages.

44	72	Said Bali	Sher Hamid	GMPS Mundai	GPS Bararo Sar No.2 ✓	Vice Muhammad Saeed
45	73	Azeem khan	Mubaras khan	GPS No.1, Jalala	GPS No.1 Batkhela ✓	Vice Afzal Hussain
46	75	Dir Nawab Khan	Umara Khan	GPS Satanadaro Kali	GPS Standaro Kalli	Already occupied post
47	76	Said Muhammad ✓	Batoor Khan	GPS Sellai Patti	GPS Selai Patti ✓	Already occupied post
48	78	Qabil khan	Ajrur khan	GPS No.1 Pirkhel	GPS Pitiow Naranji ✓	Vice Zahir Shah
49	79	Said Qasim	Muhabbat Shah	GPS Maizara Thana	GPS Maizara Thana ✓	Already occupied post
50	80	Fazli Rabbi	Astambol	GPS No.2 Totakan	GPS Ghundai ✓	Vice Said Alim
51	81	Ishaq Ahmad	Amir Muhammad	GPS No.2 Batkhela	GPSs Kalaito	Vice Muhammad Wadood
52	82	Khan Muhammad	Zar Muhammad	GPS Dargai Phatak	GPS Shawo Banda	Vice Raz Gul
53	83	Wakil Khan	Sangi Faras	GPS Hospital Colony Totai	GPS HC Totai ✓	Already occupied post
54	84	Said Rehman	Mani Gul	GPS Thund	GPS Tund ✓	Already occupied post
55	85	Muhammad Ishaq	Muhammad Essa khan	GPS Barawal	GPS Barawal ✓	Already occupied post
56	86	Qarib-ur-Rahman	Ajun Said	GPS Soor Khat	GPS Soor Khat	Already occupied post
57	89	Mashahoor khan	Amin Gul	GPS Babagano Sar	GPS Babaagano Sar ✓	Already occupied post
58	90	Aurang Zeb	Ali Haidar	GPS Haibat Gram	GPS No.2 Khar ✓	Vice Burhan Shahzada
59	92	Liaq Khan	Qadar khan	GPS Gumbad	GPS Gumbad Agra ✓	Already occupied post
60	93	Sanauallah	Aminullah	GPS No.2 Thana	GPS No.2 Thana ✓	Already occupied post
61	94	Muhammad Iqbal	Muhammad Karam	GPS Maizara Thana	GPS No. Piran ✓	Vice Shah Mulk
62	95	Arjumand khan	Chamni khan	GPS Inzargai	GPS Inzargai ✓	Already occupied post
63	96	Muhammad Khan	Muhammad Amin	GPS Fazal Abad	GPS Fazal Abad ✓	Already occupied post
64	99	Shad Muhammad	Ziarat Gul	GPS Naranji Banda	GPS Naranji Banda ✓	Already occupied post
65	100	Muhammad Dawood	Bahram Shahzada	GPS Nawagai Banda	GPS Nawagai Banda ✓	Already occupied post
66	102	Esal Muhammad	Feroz Khan	GPS Garang Dara	GPS Grang Dara	Already occupied post
67	103	Fazli Rabbi	Ghulam Haidar	GPS Gharib Abad Btk	GPS Gharib Abad	Already occupied post
68	104	Fazal Diyan	Fazalul Haq	GPS Baika	GPS Nari Tangi ✓	Vice Zahid Hussain
69	105	Ghfar gul	Noor Afzal	GPS Hero Shah Kalan	GPS Hero Shah Kalan	Already occupied post
70	107	Faiz Muhammad	Sher Muhammad	GPS Kopar	GPS Show Kalli	Vice Muhammad Nabi
71	108	Noshad Khan	Mumtaz Khan	GPS Zormandi	GPS Zormandi	Already occupied post
72	111	Ajab Khan	Mahabat Khan	GPS Saidra Jowarr	GPS Khushal Korona	Vice Rahman Gul
73	112	Khwaja Moinuddin	Bad-e-uddin	GPS Meshla	GPS Mishta ✓	Already occupied post
74	113	Muhammad Alam	Wadan Malak	GPS Hero Shah Kalan	GPS Kandow Harvankot	Vice Ali Gohar
75	114	Afzal Khan	Shah Zad khan	GPS Bar Tangai	GPS Bar Tangi ✓	Already occupied post
76	115	Muhammad Irshad	Mashal	GPS Dri Sari	GPS Dri Sari ✓	Already occupied post
77	116	Zar Gul	Naw Rooz	GPS Dara Totai	GPS Dara Totai ✓	Already occupied post
78	117	Ihsanullah	inyat Gul	GPS Saidra Jowarr	GPS Saidra Jowar	Already occupied post
79	118	Murad Ali	Mansoob Ali khan	GPS Haibat Gram	GPS Pinda Kandaro ✓	Vice Wali Shah
80	120	Muhammad Iqbal	Ishtamand	GPS Zulam Kot	GPS Pinjin ✓	Vice Muhammad Ilyas
81	121	Muhammad Jawad	Abur Razaq	GPS No.2 Batkhela	GPS Khatkay	Vice Muhammad Riaz
82	122	Aziz Ahmad	Ghulam Muhammad	GPS Palai Banda	GPS Palai Banda	Already occupied post
83	123	Shah Roz	Noor Ahmad	GPS Alefi Kali	GPS Alifi Kalli	Already occupied post
84	124	Muhammad Irshad	Yar Muhammad K	GPS Kharkai Dheri	GPS Khariki Dheri	Already occupied post
85	125	Yousaf khan	Dad Khan	GPS Barh	GPS Brah	Already occupied post
86	126	Khaista Malik	Sher Malik	GPS Gharib Abad	Gh:Abad Malkani ✓	Already occupied post
87	127	Fazli Mabood	Ajab Din	GPS No1 Dobandai	GPS No.1 Dobandi	Already occupied post
88	128	Muhammad Ismail	Muhammad Abdullah	GPS Dessa	GPS Desa	Already occupied post
89	129	Jehan Zeb	Sher Afzal	GPS Stanadaro Kali	GPS Zarif Shah Baba	Vice Mursaleen
90	130	Muhammad Akbar	Muhammad Khan	GPS Nazir Abad	GPS Nazir Abad ✓	Already occupied post
91	131	Muhammad Jamil	Abdul Malik	GPS Nai	GPS Nai ✓	Already occupied post
92	132	Muzamil Shah	Mehbob Shah	GPS Gul Muqam	GPS Gul Muqam	Already occupied post
93	134	Rahat Gul	Hejab Gul	GPS Qadam Khela	GPS Qadam Khela	Already occupied post
94	135	Ghani Rehman	Qasim Jan	GPS No.2, Jalala	GPS Jalala ✓	Already occupied post
95	136	Saeed Ahmad	Shefa Gul	GPS H Manan Korona	GPS H. Manan Korona	Already occupied post

7 Pages

96	138	Nisar Ahmad	Fazli Akbar	GPS Shaba Khel	GPS Shaba Khel ✓	Already occupied post
97	139	Painda Muhammad	Taj Muhammad	GPS Sarkai Bala	GPS Sarkai Bala	Already occupied post
98	140	Muhammad Zahoor	Muhammad Qasim	GPS Sind Ghara Bosaq	GPS Sind Ghari ✓	Already occupied post
99	141	Muhammad Hayat	Sher Zamin	GPS Mishla	GPS Khanori Banda	Vice Muslim Khan
100	143	Nisar Ahmad	Muhammad Sadiq	GPS No.1, Palai	GPS No.1 Palai	Already occupied post
101	144	Mian Hussain	Gul Dad Khan	GPS Mani Serai	GPS Mani Serai ✓	Already occupied post
102	145	Yousaf Khan	Bakhtawar Khan	GPS Kama Agra	GPS Kam Agra ✓	Already occupied post
103	148	Rahman Gul	Said Gul	GPS No1 GU Khail	GPS GU Khel No.1	Already occupied post
104	149	Yousaf Shah	Abdur Rahim	GPS No.1, Pirkhel	GPS No.1 Pirkhel ✓	Already occupied post
105	150	Munawar Khan	Musafar Khan	GPS Qadam khela	GPS Wartair	Vice Naik Bahadar
106	151	Muhammad Yar	Shahriyar	GPS No.1 Pirkhel	GPS Kadow Mekhband ✓	Vice Behroz Khan
107	152	Fazli Masood	Gul Habib	GMPS SIA NARANJI	GPS Alogai (S/P) ✓	Vice Shah Zaman
108	154	Muhammad Raziq	Khan Nazeef	GPS Dargai P/House	GPS Dargai P/H	Already occupied post
109	156	Yousaf Shah	Noor Ahmad Shah	GPS No.2, Pirkhel	GPS No.2 Pirkhel ✓	Already occupied post
110	157	Amir Bahadur	Muhammad Hasan	GPS Abdul Karim B	GPS Abdul Karim Banda	Already occupied post
111	158	Habibullah	Zaib Shah	GPS Dobandai Banda	GPS Dobandi	Already occupied post
112	159	Syed Mujahid Shah	Syed Hussain Shah	GPS Hero Shah Kaln	GPS Hero Shah	Already occupied post
113	160	Nowsher Din	Umar Din	GPS Palai Banda	GPS Jalalpur	Vice Sabir Muhammad
114	161	Muzamil Shah	Khan Said	GPS Chargo Kali	GPS Chargo Kalli ✓	Already occupied post
115	162	Muhammad Ali	Aseel Gul	GPS Ghound	GPS Ghund ✓	Already occupied post
116	163	Lal Habib	Ghulam Hazrat	GPS Hazrat Abad Kadow	GPS Hazrat Abad ✓	Already occupied post
117	164	Muntazim Shah	Khadi Khan	GPS Kharkai	GPS Kharkai	Already occupied post
118	165	Nisar Muhammad	Dost Muhammad	GPS No1 Dargai	GPS BNo.1 Dargai	Already occupied post
119	166	Badshah Hussain	Fazli Wahid	GPS No.2 D/Alld:	GPS No.2 Alladand ✓	Already occupied post
120	167	Zahoor Muhammad	Bahrooz Khan	GPS Gulshan Abad Btk	GPS Gulshan Abad	Already occupied post
121	168	Aziz-ur-Rahman	Biradar Khan	GPS BAZargai	GPS Bazargai ✓	Already occupied post
122	169	Hazir Muhammad	Amir Ahmad	GPS Haryan Kot	GPS Haryankot	Already occupied post
123	170	Fazli Hussain	Sharif Khan	GPS Palai Khpa	GPS Bama Bogarai ✓	Against V.P.
124	171	Muhammad Younas	Rahmatullah Khan	GPS Dawa Khan Kali	GPS Dawa Khan Kalli	Already occupied post
125	174	Fazli Ghaffar	Fazli Subhan	GPS Malakand	GPS Malakand	Already occupied post
126	175	Mushk-e-Anbar	Zauta Khan	GPS Faizghai	GPS Jai Kot	Vice Hafiz Rashid Ali
127	176	Ihsanullah	Muhammad Saeed	GPS Mir Ahmad Banda	GPS Mir Ahmad Banda	Already occupied post
128	177	Said Rahman	Wasiat Khan	GPS Jaban Dargai	GPS Jaban Dargai	Already occupied post
129	178	Syed Fazli Mula	Syed Karim Jan	GPS No.3 D/Alld:	GPS No.3 Alladand ✓	Already occupied post
130	179	Bakhtur Rahman	Umar Khan	GPS Ziaratgi Shah	GPS Ziaratgi Shah	Already occupied post
131	180	Muhammad Nasim	Sher Muhammad	GPS Hejab Kali	GPS Makhnawala No.1	Vice Samiul Haq
132	181	Muhammad Younas	Abdul Ghafar	GPS Chamyari Shah	GPS Cham,yari Shah	Already occupied post
133	182	Muhammad Shoaib	Fazli Rahim	GPS CC Thana	GPS Chapai Thana ✓	Vice Atta Muhammad
134	183	Ibrahim	Sultan Zaib	GPS Sangina	GPS Sangina	Already occupied post
135	184	Aziz-ur-Rahman	Amir Aman	GPS Kam Agra	GPS Maina Khanori ✓	Vice Wazir Shah
136	186	Bakht Rawan	Ziarat Gul	GPS Qadar Kali	GPSs Qadar Kalli	Already occupied post
137	189	Muhammad Raziq	Muhammad Rafiq	GPS Sori Ghara	GPS Sori Ghara ✓	Already occupied post
138	190	Salimullah	Shah Zullah Khan	GPS No.1, Pirkhel	GPS Lailu Patti ✓	Vice Muhammad Jabbar
139	191	Muhammad Riaz	Bakhtawar Khan	GPS Smaso Sar	GPS Smaso Sar ✓	Already occupied post
140	192	Muhammad Nawaz	Khailid	GPS Zulam Kot	GPS Pirana ✓	Vice Said Raziq
141	193	Amir Zada	Shah Zada	GPS Hisar Kalay	GPS Hisar Kalli ✓	Already occupied post
142	194	Zia Muhammad	Fazal Ghani	GPS Julagram	GPS Joldram	Already occupied post
143	195	Zahoor Ahmad	Dawlat Shah	GPS No2 Dargai	GPS No.2 Dargai	Already occupied post
144	196	Abdur Rashid	Umar Wahid	GPS No.1 Bararosar	GPS No.1. Bararo Sar ✓	Already occupied post
145	197	Sabir Shah	Mian Said Abbas	GPS No.3 D/Alld:	GPS Rang Mala ✓	Vice Muhammad Karim
146	198	Shawkat Ali	Sher Azoem	GPS Ghawar Kaili	GPS Ghawar Kalli	Already occupied post
147	199	Masood Hassan	Badre Munir	GPS No1 Sakhakot	GPS Khan Garhi	Vice Muslim Khan
148	200	Sultan Room	Shah Zarin	GPS Dobandai No2	GPS No.2 Dobandi	Already occupied post
149	203	Gul Nabi	Nawab Khan	GPS Aspur Total	GPS Kharchako Banda ✓	Vice Bakht Gul

7 P 85

Handwritten signature

150	207	Umar Karam	Noor Hawas	GPS JANDO	GPS Jando ✓	Already occupied post
151	209	Sultan Muhammad	Gul Rahim	GPS Aamandara	GPS Amandara ✓	Already occupied post
152	211	Nizam Ud Din	Aimuddin	GPS Seri Jalai Kot	GPS Serai Jalakot	Already occupied post
153	212	Muhammad Gul	Mahmood Gul	GPS Kandi Khatak	GPS Kandi Khatak	Already occupied post
154	214	Rahmat Ghani	Sultan Said	GPS No.2 Pirkhel	GPS Doda Banda ✓	Vice M.Yousaf Shah
155	215	Bismillah Jan	Shehriyar	GPS Haryankot	GPS Barh Ghakhi	Vice Zubair Shah
156	216	Muhammad Khan	Gul Qadar	GPS No.2 Kot	GPS No.2 Kot	Already occupied post
157	217	Muhammad Younas	Abdullah	GPS No.1, Kot	GPS No.1 Kot.	Already occupied post
158	219	Khani Mula	Said Mula khan	GPS Shinki	GPS Shinki ✓	Already occupied post
159	224	Muhammad Faraz	Muhammad Salam	GPS No.1 D/Alld:	GPS No.1 Alladand ✓	Already occupied
160	225	Ihsanullah	Aminullah	GPS No.1, Palai	GPS Karim Abad	Vice Mukhtarud-Din
161	227	Muhammad Rahim	Gul Rahim	GPS Gul Zada Kali	GPS Gul Zada Kalli	Already occupied post
162	228	Muhammad Zaman	Ali Haidar	GPS No.1, Pirkhel	GPSs No.1 Mekhband ✓	Vice Muhammad Bashir
163	229	Yousaf Ali	Sultan Muhammad	GPS Muhammad Amin	GPS M.Amin Kalli	Already occupied post
165	232	Shukat Hussain	Muhammad Nisar	GPS Said Abad	GPS Said Abad ✓	Already occupied post
166	233	Nasir Ali	Fazli Akbar	GPS Akbar Abad Btk	GPS Akbar Abad	Already occupied post
167	234	Naqib Ahmad	Muhammad Hussain	GPS GMPS Hassan Abad	GPS Khanori ✓	Vice Ubaidullah
168	236	Mukamil Shah	Hanif Shah	GPS Muhammad Patti	GPS M Patti	Already occupied post
169	238	Shahi Room	Amir Zada	GPS No.2 Thana	GPS Kandaku ✓	Vice S.Abdul Haq
170	240	Abdul Jalil	Abdur Rahman	GPS Hazrat Manan	GPS Aghi Garh	Vice Ibadur-Rehman
171	241	Khaista Muhamad	Gul Muhammad	GPS No1 Dargai	GPS Katabol	Vice Raza Khan
172	242	Jamshid Khan	Muhammad Yousaf	GPS No2 Gulo Shah	GPS No.2 Gulo Shah	Already occupied post
173	243	Fazli Hadi	Ghulam Rasool	GPS Munawar Shah K	GPS Munawar Shah Kalli	Already occupied post
174	244	Anwar Khan	Bakhtawar	GPS Sharif Abad	GPS Sharif Abad	Already occupied post
175	245	Farhad Gul	Murad Gul	GPS Naseemula Kaili	GPS Nasimulah Kalli	Already occupied post
176	246	Qadar Khan	Gulab Khan	GPS Ashakai	GPS Ashakai	Already occupied post
177	247	Muhammad Sattar	Said Karim Jan	GPS No.3 D/Alld:	GPS Jalakot ✓	Vice Zafar Malik
178	248	Ihsan Nabi	Said Hassan	GPS Akbar Abad Btk	GPS Akhtar Ghundai	Against V.Post.
179	249	Gul Ahmad Khan	Shah Didar	GPS Dargai Jaban	GPS Spero Gatti	Vice Hakim Khan
180	250	Munir Ali	Mir Zamin khan	GPS Zainai (Agra)	GPS Zainai Agra ✓	Already occupied post
181	251	Muhammad Younas	Abdul Hanan	GPS No.1, Thana	GPS No.1 Thana ✓	Already occupied post
182	252	Lajbar Khan	Akhtar Gul	GPS Dargai Phatak	GPS Khatako Shah	Vice Sabir Ahmad
183	253	Muhammad Qasim	Sahib Rahman	GPS Jharai	GPS Jhari	Already occupied post
184	254	Aslam Khan	Shamshere Khan	GPS Stanadaro Kali	GPS GPS Radad Kalli	Vice Fazli Mehmood
185	255	Fazli Sattar	Abdul Samad	GPS Bakhta	GPS Hatam Banda ✓	Vice Said Karim
186	256	Noor Zada	Lal Zada	GPS Dargai Phatak	GPS Dewan Shah Baba	Vice Raidullah
187	257	Fida Hussain	Abdul Waris	GPS Dhanda	GPS Danda ✓	Already occupied post
188	258	Qayum Khan	Sadullah Khan	GPS Hero Shah	GPS Mir Azam Korona	Vice Shah Said
189	259	M.Jehangir Khan	Raidar Muhammad	GPS No.1 Sakhakot	GPS Ahmad Said Badshah mood Shah S. Inayat Khan ✓	Vice Asad Khan
190	260	Sharif Khan	Mashar Khan	GPS GPS H/C TOTAL	GPS Dheri Banda ✓	Vice Saseedullah
191	261	Fazli Naeem	Fazli Khaliq	GPS Haibal Gram	GPS Sorana ✓	Vice Raz Badshah
192	262	Fazli Rabani	Gulam Qadar	GPS Hero Shah	GPS Nashoro Kandow	Vice Salim Khan
193	263	Manzoor Gul	Habib Gul	GPS Kopar	GPS Lalifi Kalli	Vice Fazal Rabbi
194	264	Abdul Ghafoor	Fakhrul Islam	GPS Julagram	GPS Trai Serai	Vice Bazir Khan
195	265	Said Shah	Stana Gul	GPS Wazir Abad	GPS Wazir Abad	Already occupied post
196	266	Attaullah Jan	Sher Bahadar	GPS Said Abad	GPSs Hadi Khas ✓	Vice Amjad Ali
197	267	Sardar Ali	Muhammad Ali	GPS Faizghai	GPS Muna Shah	Vice Abdul Shakoor
198	268	Abdul Ghafoor	Khvidad khan	GPS Dessa	GPS Banjo	Vice Muhammad Ikram
199	269	Iqbal Hussain	Niamatullah	GPS Said Abad	GPS No.1 Prangi ✓	Vice Muhammad Saddiq
200	270	Niamat Jalal	Sher Zaman	GPS Jughral	GPS Jughral Total ✓	Already occupied post
201	271	AltafUr Rahman	Abdul Saleem	GPS Ghawar Kall	GPS Shingral	Vice Inayat Khan
202	272	Muhammad Zakeria	Gujar khan	GPS Qulangai	GPS Qulangi ✓	Already occupied post
203	273	Hasanul	Sar Biland	GPS Qulangai	GPS Sra Sanah ✓	Vice Sultanud-Din

Forewent

07 pages.

Handwritten signature

204	274	Muhammad Dawod	Muhammad Zuhair	GPS Ghwndo Bala	GPS Ghundo Bala	Already occupied post
205	276	Zafar Khan	Muhammad Ali	GPS Akram Abad	GPS Akram Abad	Already occupied post
206	277	Liaqat Ali	Saar Khan	GPS Kharkai	GPS Karkani	Vice Ghani Khan
207	278	Azizullah	Mir Haidar Khan	GPS Arab Danda	GPS Arab Danda	Already occupied post
208	279	Salman	Muhammad Quresh	GPS Chirat	GPS Chirat ✓	Already occupied post
209	281	Dir Muhammad	Abdul Jabar	GPS Plandara	GPS Plandara	Already occupied post
210	282	Ajmal Khan	Sangi Faras	GPS Tangai Khwar AGRA	GPS Tanagi Khwar Agra ✓	Already occupied post
211	283	Rasool Ur Rehman	Ghulam Sarwar	GPS Serai Dheri Alladand	GPS Serai D/A ✓	Already occupied post
212	284	Sardar Hussain	Noor Muhammad	GPS No.2, Palai	GPS No.2 Palai	Already occupied post
213	285	Ghulam Hussain	Ghulam Mustafa	GPS Said Abad	GPS Bazdara Payan ✓	Against Vacant Post
214	286	Bashir ul Islam	Islam Murad	GPS Dhanda	GPS Ahmad Said Banda ✓	Vice Asad Khan
215	288	Farokh Shah	Ghalib Shah	GPS Hero Shah Kalan	GPS Jamo Banda	Vice Sajid Anwar
216	289	Makaiz Khan	Hakim Said	GPS Gumbad	GPS Spankharo (Kot)	Vice Suliman
217	290	Muslim Khan	Said Rahman	GPS No1 Dargai	GPS Sarogai	Vice Karimullah
218	291	Muhammad Ayub	Abdur Rahman	GPS Bagh Dheri	GPS Bagh Dheri	Already occupied post
219	292	Sherin Badshah	Gul Badshah	GPS Hospital Colony Totai	GPS Dukan Masjid ✓	Vice sMuhamad Faqyaz
220	295	Muhammad Anam	Muhammad Ali Kh	GPS Hassan Abad	GPS Hassan Abad	Already occupied post
221	296	Muhammaad Yousaf	Jehangir Khan	GPS Julagram	GPS Gito Ghundai	Vice Muhammad Rafiq
222	297	Amir Afzal	Sher Ghani Khan	GPS No.2 Tolakan	GPS Dub Korona ✓	Vice Bakht Zada
223	298	Hidayatullah	Shefa Gul	GPS Stanadaro Kali	GPS Ghamgin Abad	Vice Fazli Wahab
224	300	Muhammad Yousaf	Ziarat Gul	GPS Shah Dehrai	GPS Shah Dheri	Already occupied post
225	301	Muhammad Waris	Muhammad Sadiq	GPS Khairo	GPS Khairo	Already occupied post
226	302	Gul Karim	Walayat Khan	GPS Ghani Dheri	GPS Muqam Kalli	Vice Rafiullah
227	304	Abdul Lateef ✓	Hafez Sherin	GPS Soorbat	GPS Soor Bat	Already occupied post
228	305	Malang Jan	Dost Muhammad	GPS Mir Akbar Khan B	GPS Sir A.Khan Banda	Already occupied post
229	306	Shah Zaman	Gul Farin	GPS Hakim Abad	GPS Hakim Abad ✓	Already occupied post
230	307	Muhammad Nawaz	Malook	GPS Gat Koto	GPS Gat Koto ✓	Already occupied post
231	308	Fazal Malik	Fazal Khaliq	GPS Hisar Baba	GPS Sheikh Hassan Baba ✓	Vice Safdar Hussain
232	309	Salar Muhammad	Rahim Gul	GPS No.2 Thana	GPS Rashaagai ✓	Sabir Muhammad
233	310	Atta-ur-Rehman	Shakir Ullah Khan	GPS Hisar Kalay	GPS Baloo (Kot)	Vice Badshah Khan
234	311	Bashir Ahmad	Alef Gul	GPS Jharai	GPS Gujar Khan Dheri	Vice Hassan Idrees
235	312	Abdul Qasim	Durrani	GPS Qaldara	GPS Saigaro Banda	Vice Noor Rehman
236	313	Amir Usman	Said Nazir	GMPS KOWAR JABBA	GPS Jughrai Khanori ✓	Vice Anwar Khan
237	314	Haq Nawaz	Niaz Muhammad	GPS Gat Koto	GPS Mayar ✓	Vice Mir Afzal
238	315	Hamish Gul	Saifullah Khan	GPS Hero Shah	GPS Anar Tanagi	Vice Mubbashir Mehmood
239	317	Ihsanullah	Ghulam Salik	GPS jharai	GPS Malikhelo Wand	Vice Sher Ali
240	318	Ihsan Wali	Gul Wali	GPS Kas Korona	GPS Kas Korona	Already occupied post
241	319	M. Naeem Khan	Mamoor Khan	GPS Zarif Shah Baba	GPS Shah Haidar B	Vice Sultan Rahim
242	320	Fazli Sattar	Harood Khan	GPS Kandi Khatak	GPS Ghundo Payan	Vicew Bakhti Rawan
243	321	Aminullah ✓	Amirullah	GPS Zarif Shah	GPS Mekhnawala No.2	Against VP vice M.Liqo retired
244	323	Muhammad Naeem	Muhammad Roshan	GPS Qadam Khela	GPS Landfai Shah	Vice Hayat Khan
245	324	Aitaf Hussain	Sher Afzal	GPS Sher Khana	GPSs Sher Khana	Already occupied post
246	326	Shah Wazir Khan	Mohiud Din	GPS Mura Banda	GPS Mura Banda	Already occupied post
247	327	Habib Hassan	Muhammad Khan	GPS Adil Banda	GPS Adil Banda ✓	Already occupied post
248	328	Javed Iqbal	Khalil Ullah	GPS Bakhta	GPS Shah Kot. ✓	Against V.P.
249	329	Muzafar Khan	Sher Muhammad	GPS Nasiruddin korona	GPS Nasisrud-Din Korona ✓	Already occupied post
250	330	Farman Ali	Sher Azem	GPS Kachi Koper	GPS Kaachi Koper	Already occupied post
251	331	Wali Muhammad	Khan Sherin	GPS Bajawro Kalli	GPS Bajawro Kalli	Already occupied post
252	332	Muhammad Naeem	Mushke Ambar	GPS Sellai Patti	GPS Dheri Kot ✓	Vice Gul Amin
253	333	Muhammad Nafees	Khan Zada	GPS Palai Khpa	GPS Palai Khpa ✓	Already occupied post
254	335	Fazli Rabi	Mira Jan	GPS Aspur Kadow	GPS Aspur Kadow ✓	Already occupied post
255	336	Nisar Muhammad	Badshah Muhmd	GPS Latif Colony	GPS Latifi Colony	Already occupied post
256	337	Muhammad Yaseen	Ajab Noor	GPS Wazir Abad	GPS Khushal Garh	Vice Nisar Ahmad
257	339	Nazar Gul	Wazir Gul	GPS No.2 GU Khel	GPS No.2 GU Khel	Already occupied post
258	340	Asad Ullah	Sabir Khan	GPS No.1 Tolakan	GPS No.1 Tolakan ✓	Already occupied post

259	343	Jamil khan	Mira Jan	GPS Dara Totai	GPS Barchari ✓	Vice Muhammad
260	344	Ghaus Rehman	Aslam khan	GPS Qulangai	GPS Karapa (Kot) ✓	Vice Shamsur-
261	345	Nasar khan	Shah Wazir khan	GPS Adil Banda	GPS Koragh ✓	Vice Suliman
262	346	Gul Faqir	Taza Gul	GPS Sadullah Khan B	GPS Sadullah Khan Banda	Already occupied post
263	347	Nazir Hussain	Aminullah	GPS Sher Khana	GPS Bazdara Baia	Vice Muhammad Wisal
264	348	Fazli Wahab	Aman Khan	GPS Sadullah Khan Kali	GPS Tpr Kalli	Vice Gulistan Ahmad
265	350	Zakir Hussain	Haji Nawab	GPS No.2, Palai	GPS Khog Dara	Vice Gauhar Rehman
266	351	Inayat khan	Akbar Said khan	GPS No.1 Totakan	GPS BaghDara ✓	Vice Zahir Shah
267	352	Khan zaib	Aurang Zeb	GPS No.2, Mekhband	GPS Dara Maina (Kot) ✓	Vice Arif Gul
268	353	Muhammad Nisar	Abdullah	GPS No.2 Thana	GPS Nakardara ✓	Vice Liaq Shah
269	354	Usman Ali	Tooti	GPS No.2 Bogar cham	GPS No.2 Bogar Cham ✓	Already occupied post
270	355	Sultan Mehmood	Wali Muhammad	GPS Jotagram	GPS Kasinat	Vice Fazli Ghaffar
271	356	Umar Farooq	Sultan Hussain	GPS Khairo	GPS Dheri	Vice Zahoor Ajhmad
272	357	Abdul Saboor ✓	Abdul Kabir	GPS No.2, Pirkhel	GPSs Sholawai ✓	Vice Muhammad
273	359	Muhammad Parvez	Sher Alam	GPS Chinargai	GPS Chinargai	Already occupied post
274	361	Muhammad Islam	Amin khan	GPS Tanqi khwar (inzargi)	Tangi Khwar Inzargai ✓	Already occupied post
275	362	Muhammad Hanif	Gul Faroosh	GPS Police banda	GPS No.1 Khar	Vice Fazal Rauf
276	363	Haroon Rashid	Bahramand	GPS Gharib Abad (Malkani)	GPS Asghar Shah (Kot) ✓	Vice Ijazur-Rehman
277	365	Faizul Mehmood	Syed Mubarak Shah	GPS Total Tangai	GPS Total Tangi ✓	Already occupied post
278	367	Muhammad Iddress	Fazli Elahi Jan	GPS Upper Balkhela	GPS U/Balkhela	Already occupied post
279	368	Bashir Ahmad	Fazli Rehman	GPS Gunyar	GPS Gandero Sharif ✓	Vice Said Khan
280	371	Sardar Muhammad	Ghulam Hadi	GPS Akbar Abad Bik	GPS Gumbad Balkhel	Against V.P.
281	372	Muhammad Jamil	Abdul Hasham khan	GPS No.1, Bogar Cham	GPS No.1 Bogar Cham ✓	Already occupied post
282	373	Fida Hussain	Fazal Ghani	GPS Chinar Koto	GPS Chinar Koto	Already occupied post
283	374	Saifur Shah	Mian Badshah	GPS Said Abad	GPS Sahib Zada Baba	Vice Arshad
284	375	Muhammad Nisar	Haidar khan	GPS No.1, Thana	GPS Zangal Palli ✓	Vice Israr Ahmad
285	377	Khadim Hussain	Perhaizgar ✓	GPS Shaba khel	GPS Chapal ✓	Vice Janat Gul
286	378	Hazrat kabir	Rahmat Ullah	GPS Matkani	GPS Matkani ✓	Already occupied post
287	379	Fazli Raziq	Ghani Haidar	GPS Loya Banda	GPS Loya Banda	Already occupied post
288	381	Tauheed Ahmad	Aurang Zeb	GPS Shagai Amandara	GPS Shagai Amandara ✓	Already occupied post
289	382	Noor Wahid	Muhammad Saleh	GPS Gero Shah	GPS Gero Shah	Already occupied post
290	383	Rafiullah	Muhammad Khan	GPS Kharki	GPS Jabban Power House	Vice Gul Zada
291	384	Riazullah	Shakirullah	GPS Kanday Khatak	GPS No.1 Gulo Shah	Vice Umar Badshah
292	385	Hazir Muhammad	Dost Muhammad	GPS No2 Dargai	GPS Sharif Abad	Vice M.Arshad
293	386	Shaukat Ali	Abdul Washid	GPSD Sabil Banada	GPS Sabil Banda	Already occupied post
294	387	Safdar Ali Shah	Guhar Ali Shah	GPS Standaro Kali	GPS Hassan Korona	Vice Javed Iqqbal
295	388	Ahmad Hussain	Said Usman	GPS No.3 Totakan	GPSs No.3 Totakan ✓	Already occupied post
296	389	Ikram Muhammad	Ghulam Muhammad	GPS Jalawanan	GPS Jalawanan ✓	Already occupied post

Note:-1-An undertaking to the effect that any overpayment if made to them as a result of incorrect up gradation of these PST to BPS No.15, the same will be made good by recovery from their pay/pension/gratuity should be obtained from them in their S/Books.

07 pages.

[Handwritten signature]

07 Pages.

2- Necessary entry to this effect shall be made in their S/Books.

3. change report should be submitted to ~~all~~ concerned

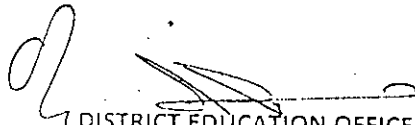
(MUSHTAQ AHMAD)
DISTRICT EDUCATION OFFICER (M),
MALAKAND AT BATKHELA.

760-1165

Endst: No. _____ / FNo. Upgradation of PSTs/Supdt:/DEO(M)/MKD Dated 07/02 2013

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

- 1- The Secretary, E&SE Department, Govt: of Khyber Pakhtunkhwa, Peshawar.
- 2- The Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
- 3- The Sub Divisional Education Officer (M), Swat Ranizai at Batkhela.
- 4- The Sub-Divisional Education Officer (M), Sama Ranizai at Dargai.
- 5- The District Accounts Officer, Malakand.
- 6- The Asstt: Programmer, DEMIS Cell, local office
- 7- ⁴⁸⁶598 All the Headteachers of the concerned Schools.


(DISTRICT EDUCATION OFFICER (M),
MALAKAND AT BATKHELA.

(97)
Annex B

DISTRICT EDUCATION OFFICER(M), MALAKAND AT BATKHELA.

ADJUSTMENT.

Consequent upon the recommendation of the DPC in its meeting held on 28.6.2013 appeals of the following aggrieved PSHT, SPSTs and PSTs found convincing on the basis of seniority against their posting made through this office order issued under Endst:No.760-1165 Dated 9.02.2013 is hereby accepted and the following adjustment are hereby made with immediate effect in the interest of public service.

S.No.	Sl:No. in the notification of 9.2.2013..	Name and Designation	Present place of posting	School where repatriated /adjusted	Remarks.
1	215	Shakil Ahmad, PST substitute of Mr. Farukh Shah	GPS Jamu Banda	GPS Hero Shah Kalan	Vice Sajjad Anwar, PST repatriated to GPS Jamu Banda.
2-	241	Muhammad Naeem, PSHT,	GPS Shah Haider Banda	GPS Zarif Shah Baba	Vice Jehanzeb, PSHT is adjusted at GPS Shah Haider Banda.
3	256	Nisar Ahmad, PST, Sr:No.746	GPS Standaro Kalli	GPS Khushal Garh	Vice Muhammd Iqbal Sr:No.982 adjusted at GPS Stanadaro Kalli.
4-	266	Zfahir Shah, PST, Sr:No.	GPS No.1 Totakan	GPS Bagh Dara	Vice Mr. Javid Iqbal is posted at GPS No.1 Totakan.
5-	216	Suliman, PST Sr:No.	GPS Gumbad Agra	GPS Spinkharo. Sharif	Vice Salman Khan, PST is posted at GPS Gumbad Agra.
6	107	Shah Zamin, PST Sr:No.	GMPS Sia Naranji	GPS Alogai	Vice Ismail Muhamnmad, PST is posted at GMPS Sia Naranji.
7	99	Muslim Khan, PST	GPS Mishta(Agra)	GPS Khanori Banda	Vice Wahid Muhammad ,PST is posted at GPS Mishta(Agra).
8.	68	Zahid Hussain, PST	GPS Baika Pirkhel	GPS Nari Tangi	Vice Fazal Haqani, PST is posted at GPS Baika Pirkhel

Annexure B

96

262	Muhammad Bashir,PST	GPS No.1 Pirkhel	GPS No.1 Mekhband	Vice Wajid Ali,PST is posted at GPS No.1 Pirkhel.
276	Ijazur-Rehman,PST	GPS Gharib Abad, Matkani	GPS Asghar Shah	Vice Zaiwar Rehman,PST is posted at GPS Gharib Abad Matkani.
31	Jamshaid Khan,SPST	GMPS Nasar Abad	GPS Bagh Din Kalli	Vice Jamshaid Ali,PST is posted at GMPS Nasar Abad.
222	Bakht Zada,SPST	GPS No.2 Totakan	GPS Dub Korona	Vice Muslim Khan,PST is posted at GPS No.2 Totakan.
360	Shamsur-Rehman,PST	GPS Qulangi	GPS Karapa	Vice Muhammad Tahir PST is posted at GPS Qulangi
145	Amir Afzal,PSHT	GPS Grang Dara	GPS Mayar	Vice Azam Khan,PST is posted at GPS Grang Dara.
135	Wazir Shah,SPST	GPS Kam Agra	GPS Maina Khanori	Vice Shahmin ,PST is posted at GPS Kam Agra.

Charge reports should be submitted to all concerned.
No TA/DA is allowed.

(ABDULLAH)

DISTRICT EDUCATION OFFICER(M),
MALAKAND AT BATKHELA.

No. 3788-3823 /F.No.Promotion of PST : DEOO(M)/MNKD Dated 31-07 /2013.

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

The Director, E&SE, Khyber Pakhtunkhwa, Peshawar.

The Distt:Accounts Officer, Malakand.

The SDEO(M), Swat Ranizai at Batkhela.

The SDEO(M), Sama Ranizai at Dargai.

The Asstt:Programmer, DEMIS Cell local office.

6-All the Headteachers of the concerned Schools.

DISTRICT EDUCATION OFFICER(M),
MALAKAND AT BATKHELA

Annexure C

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MALAKAND AT BATKHELA.

ADJUSTMENT.

Consequent upon the recommendation of the inquiry officer vide his memo No.1072 dated 10-09-2013 and recommendation of the District Review committee, District Malakand, in its meeting held on 19-09-2013, appeals of the following aggrieved PSHTs, and SPSTs found convincing on the basis of seniority against their posting made through this office order issued under Endst: No. 760-1165 dated 09-02-2013 and Endst: No.3788-3823 dated 31-07-2013 is hereby accepted and the following adjustment are hereby made with immediate effect in the interest of public service.

S.No	Name and Designation.	Present place of posting.	School where Posted/ adjusted.	Remarks.
1.	Jehan Zeb PSHT B-15	GPS, Shah Haidar Banda.	GPS, Nashoro Kandwo.	V.S.No. 02
2.	Fazal Rabbani PSHT B-15	GPS, Nashoro Kandow.	GPS, Shah Haidar Banda	V.S.No. 01
3.	Muhammad Naeem PSHT B-15	GPS, Zarif shah Baba	GPS, Zarif shah Baba.	Alrerady adjusted.
4.	Hakim khan SPST B-14	GPS, Zarif shah Baba	GPS, Zarif shah Baba	Already adjusted.
5.	Mursaleen SPST B-14	GPS, Stanadaro Kalli	GPS, Stanadaro Kalli	Already adjusted.

Note:- No TA/DA is allowed.
Charge reports should be submitted to all concerned.

(ABDULLAH)
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Endst: No. 5278-91 / F.No. Promotion of PSTs (M) Dated 21-9 2013.

1. Copy forwarded for information and necessary action to:-
2. The Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. The District Accounts officer, Malakand.
4. The Sub Divisional Education officer (Male) Sama Ranizai at Dargai.
5. The Assistant Programmer, DEMIS, Cell local office.
9. The Head teachers concerned.
- 10-14. The teachers concerned.


DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Ammerulze D.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MALAKAND AT BATKHELA.

APPEAL OF PSTs, SPSTs AND PSHTs (MALE) FOR POSTING/ADJUSTMENT IN THE NEAREST STATION OF THEIR UNION COUNCIL ON SENIORITY BASIS.

s.No.	Name of teacher/Designation.	Present school.	Brief grounds.	Recommendation of the R/Committee.	Decision.
1.	Jehan Zeb. PSHT	GPS, Shah Haidar Banda. (U/C G.U.Khel)	Applied for posting/adjustment at nearest station at his own U/Council and statement also given to the enquiry officer in this regard. <i>Applied for posting / adjustment at nearest station at his own U/C.</i>	Applied for posting/adjustment at nearest station at his own U/Council and statement also given to the enquiry officer in this regard. <i>Appeal accepted on the basis of Seniority and may be adjusted at GPS Nashoro Kandow.</i>	<i>Appeal accepted.</i>
2.	Fazal Rabbani. PSHT	GPS, Nashoro kandow. (U/C Heroshah)	Applied for retention at his own place of duty.	<i>He may be adjusted at GPS Shah Haidar Banda because he is junior to Jehan Zeb PSHT.</i>	<i>Due to acceptance of appeal of Mr. Jehan Zeb PSHT.</i>
3.	Muhammad Naeem. PSHT.	GPS, Zarif shah Baba. (U/C Heroshah)	Applied for posting/adjustment on the basis of merit at his own U/Council	<i>He may be retained at his own school i.e. GPS Zarif Shah Baba, as his appeal has already been honoured.</i>	<i>Already adjusted.</i>

Ammer

19/9/13

1/11

11-4-2013

Paul

19/9/13

Mud

4.	Hakim khan. PST	GPS, Zarif shah Baba.	Applied for retention at his own station during the enquiry.	He may be retained already at his own station because adjusted. He has already adjusted at GPS Zarif Shah Baba.
5.	Mursaleen. PST	GPS, Stanadaro kalli.	Applied for posting/adjustment at GPS, Zarif shah Baba.	Appeal Appeal rejected due to his placement in his own U/C. Appeal rejected.

Mur
2/19/13

A.D.O. (ESTT) LOCAL OFFICE MEMBER

SDEO(M) BATKHELA. MEMBER

SDEO(M) DARGAI. MEMBER

HEADMASTER GHS, G.U. KHEL. MEMBER

HEADMASTER GHS, THANA. MEMBER

PRINCIPAL GCMHS BATKHELA. MEMBER

DY: DIST. EDU. OFFICER (M) MALAKAND AT BATKHELA. MEMBER

DISTRICT EDUCATION OFFICER (MALE) MALAKAND AT BATKHELA. CHAIRMAN.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1521/2013

Mr Jehan Zeb

VS

Govt: of KPK

REJOINDER ON BEHALF OF APPELLANT
IN RESPONSE TO THE REPLY
SUBMITTED BY THE RESPONDENTS

R/ SHEWETH:

PRELIMINARY OBJECTIONS:

(1 TO 5):

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Admitted correct hence need no comments.
- 2- Admitted correct hence need no comments.
- 3- Incorrect and not replied accordingly. That astonishingly just after six months stay at GPS Zarif Shah Banda the appellant was transferred pre-maturely to GPS Shah Haider Banda vide order dated 31.7.2013. That feeling aggrieved the appellant filed Departmental appeal against the order dated 31-07-2013 with the contention that being senior most employee of the Department and under the policy of the provincial Government the appellant should not be disturbed/transferred from GPS Zarif shah Banda.
- 4- Incorrect and not replied accordingly. That on the said Departmental appeal the respondent Department constituted inquiry in the matter which ended in favor of the appellant vide dated 21-09-2013 and the appellant was transferred to GPS Nashoro Kandow vide order dated 21.9.2013. That in result the appellant took over the charge of the said post vide dated 25-09-2013.
- 5- Incorrect and not replied accordingly. That respondent No.4 being blue eyed person to the local MPA of Tehsil Dargai was succeeded just after the laps of one month and ten days by canceling the order dated 21-09-2013.

6- Incorrect and not replied accordingly hence denied.

GROUND:
(A TO I):

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondents are incorrect and baseless hence denied. That being senior to private respondent No.4 the appellant has the right to be adjusted near to his home station under the law and prevailing policy of the Government of Khyber Pakhtunkhwa. That the impugned orders dated 31-07-2013 and 31-10-2013 are against the Notification dated 21-01-2013 of the respondent Department and also against the clause I, II and IV of the transfer/posting policy of the provincial Government of Khyber Pakhtunkhwa. Moreover the impugned order dated 31-10-2013 has been issued in violation of the principle of "LOCUS POENITENTIAE".

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

APPELLANT



JEHANZEB

THROUGH:



NOOR MUHAMMAD KHATTAK
ADVOCATE

Registered

R-3

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

No: 8196 /F.No.Promotion.of PSTs
Dated 3-12 / 2013.

To

The Section officer (Primary)
Govt. of Khyber Pakhtunkhwa,
Elementary and Secondary Education,
Peshawar.


Subject: POSTING/TRANSFER.
Memo,

Reference your office memo No.SO (PE) E&SE/2-1/Gen:Transfer/2013 dated 20-11-2013 on the above cited subject.

It is submitted that the transfer order in respect of Mr. Jehan Zeb PSHT Government Primary school, Nashoro Kandow, District Malakand was cancelled on the directives of the Chief Minister, Khyber Pakhtunkhwa, Peshawar conveyed through your letter No.SO (PE) E&SE/2-1/Gen:transfer/2013 (Copy attached as annexure-A) and remarks of the Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar recorded on the body of your letter dated 01-10-2013 vide his office memo No.Nil dated 01-10-2013 (Copy attached as annexure-B).

Submitted for your kind perusal and necessary action please.

Encl: As above.


DISTRICT EDUCATION OFFICER (MALE)
MALAKAND AT BATKHELA.

Attested

g.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 468 /ST

Dated 8 / 04 / 2015


To

The DEO (Male),
Malakand at Batkhela.

Subject: - APPEAL NO. 152/2013 JEHAN ZEB VS SECRETARY (E&SE), KPK
PESHAWAR AND OTHERS.

I am directed to forward herewith a certified copy of Judgement dated 27.03.2015 passed by this Tribunal on subject appeal for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.