FORM OF ORDER SHEET

Court of		
Anneal No	2612/2023	

S.Ne	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
•		· · · · · · · · · · · · · · · · · · ·
1-	- 20/12/2023	The appeal of Mr. Waqar Ahmad presented today
		by Mr. Muhammad Amin Khattak Lachi Advocate. It is fixed
-		for preliminary hearing before Single Bench at Peshawar on
		. Parcha Peshi is given to the counsel for the
		appellant.
• 1	,	
	. ,	By the order of Chairman
		A.
		REGISTRAR



BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

WAKALATNAMA

Waqar Ahmad S/o Sanobar Khan

VERSUS

(Applicant) (Appellant)

D - - - - - - - - - - - - \

District Education Officer & Others

(Respondents) (Defendants)

I ,<u>Waqar Ahmad</u> (Appellant) in the above noted <u>Appeal</u>, do hereby appoint and constitute, <u>Muhammad Amin Khattak Lachi ASC & M.</u>

Yaseen HassanKhelvi Advocate High Court, to appear, plead, act, compromise, withdraw or refer to arbitration to me/us as my/our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.

ACCEPTED

Muhammad Amin Khattak Lachi.

Advocate, Supreme Court of Pakistan.

M. Yaseen HassanKhelvi

Advocate High Court.

0000

0345-4949553.

Yaseenhasankhelvi6@gmail.com.

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. <u>26/2</u>-1/2023

Waqar Ahmad		Appellant
	Versus	
District Education Office	r. Kohat etc	Respondent

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Through

Appellant

Muhammad Amin Khattak Lachi Advocate Supreme Court

R

Muhammad Yaseen Hassan Khelvi Advocate High Court

BEFORESTHE HONORABLE KHYBER PAKHTNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 26/2 -P/2023.

Waqar Ahmad	-S/o Sanobar	Khan	`R/o	Lachi	payan	District
Kohat . EX-			- '	. •		
•					Арре	llant.

VERSUS

- 1: District Education officer Kohat...
- 2. Director Elementary and Secondary Education KPK Peshawar.

PAKHTUNKHWA SREVICE TRIBUNAL ACT, 1974,
READ WITH RELEVANT RULS, AGAINST THE
IMPUGNED ORDER ENDST/NO 7740-44/A25 DATED
06/02/2020, WHEREBY RESPONDED NO 2 REMOVE
THE APPELLANT FROM SERVICE WHICH IS
UTTER VIOLATION OF LAW AND RULES, AND
DEPARTMENTAL APPEAL DATED 05.07.2023 WAS
NOT DECIDED.

PRAYER:

ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 96/02/2020 MAY BE SET ASIDE AND APPELLANT MAY KINDLY BE REINSTATE IN SERVICE ALONG WITH BACK BENEFITS.



Respectfully Sheweth,

- 1. **That** the appellant is the permanent resident of Lachi Kohat and belongs to a respectable family.
 - 2. **That** the appellant was appointed as a PET (BPS-09) on 03/03/2004 through ENDST no 7740-44/A25 on vacant post as a PET at G.H.S Malgin Kohat and took charged there.
- 3. That appellant joined the post and performed his duty to the entire satisfaction of their superior and there was no complaint what so ever against the appellant.
- 4. **That** the appellant then promoted to the post of S.P.E.T.(BPS 16) through **Endst No 1262** dated 21.02.2013 on already occupied seat at G.H.S.S Lachi Kohat.
- 5. That appellant and his father unluckily charged in a fabricated murder case on August 5th of 2019 and after a few days, the appellant's brother was killed by his enemy within the court's premises in Kohat.
- 6. That due to pressure, enmity, and challenging circumstances, the appellant relocated to Punjab for security. However, they vehemently pursued the appellant and his family, filing various cases due to his government job. But in the absence of appellant the respondents department removed the appellant in absentia without observing the legal formalities on 06:02.2020, which is against the law and rules.
- 7. **That** the appellant then surrender himself before the court and was honorably acquitted by the trial court on 17.06.2023.
- 8. **That** after acquittal appellant filed a departmental appeal on 05.07.2023 which was not responded by the respondents.
- 9. **That** the appellant being seriously aggrieved through order dated 06/02/2020 and by not giving reply of departmental appeal dated 05:07.2023, filling instant appeal before this honorable service tribunal on the following grounds inter alia.

GROUNDS.

1. That impugned order dated 06/02/2020 No; 7740-44/A25 regarding appellant is totally illegal and against the law, and is liable to be set aside:

- 2. **That** the impugned order is based upon malafide, ill well and is liable to be set aside.
- 3. **That** the appellant was condemned unheard and the entire departmental proceeding were conducted ex-parte and no chance of hearing was given to the appellant nor the respondent properly served the appellant through local police station or through jail authority.
- 144. That no proper inquiry was conducted by the inquiry officer nor recorded the statement of any witnesses and the entire proceeding are in the violation of 10-A of the constitution of Pakistan.
 - 5. That major penalty cannot be imposed upon civil servant without conducting the proper inquiry by giving showcause notice and by other legal formalities.
- 6. **That** mere abscentia is no ground for the removal of civil servant from long standing service.
- 7. That the major/ minor penalty cannot be imposed upon any civil servant without providing them any single opportunity of hearing as, I was at Punjab due to enmity.
- 8. That the respondents have badly failed to follow the service law before conviction, therefore the entire proceeding are void ab initio and are liable to be set aside.
- 9. **That** some other ground may be addused during the course of arguments.

On acceptance of this appeal, the impugned order dated 06/02/2020 may be set aside and appellant may kindly be reinstate in service along with back benefits.

Through

Appellant

Muhammad Amin Khattak Lachi
Advocate Supreme Court

12023

Muhammad Yascen Hassanikhelvi Advocate High Court.

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. /2023

Waqar Ahmad S/o Sanobar Khan

VERSUS

District Education Officer Kohat & others

AFFIDAVIT

I Waqar Ahmad R/o Lachi Payyan Dist. Kohat do, hereby solemnly affirm and declare that the contents stated in my accompanying appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court. Moreover, I have not filed any other appeal, except the present appeal, for the same cause of action, or other matter connected with my terms and conditions of service.

Contrary Counter

DEPONENT



BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

	Service appeal No:	/2023	
Waqar / Kohat.	Ahmad S/o Sanobar Kl x- S <i>PET GHSS Lac</i> h	nan R/o La I Koha Ł	_
ar ar an	<u> </u>	·	Appellant.
127.			
	VERSUS	e e e e e e e e e e e e e e e e e e e	
The state of the s			
Sie Control	. District Education office	er Kohat	
٧.	. Director Elementary and	, ,	Education KPK
	Peshawar.		
iii	. Secretary of Elementary	and Secon	dary Education KPk
	Peshawar.		
		•!	
		Respo	ndents.
	· · · · · · · · · · · · · · · · · · ·		

APPLICATION FOR CONDONATION OF DELAY IN FILLING APPEAL.

Respectfully Sheweth:

That Applicant most humbly submits as under:-

- 1. That the above titled appeal has been filed in this Honorable Court in which no date of Hearing has been fixed so for.
- 2. That there is delay in filling the instant appeal due to the reason that the appellant was seriously ill, and was behind the bar for sufficient time and unable to approach the counsel.

(All Medical documents are attached)

- 3. That the delay in filling the instant appeal is neither intentional nor will full but due to the good and sufficient reason shown herein above.
- 4. That petitioner has got good prima facie case and is hopeful for success of the captioned appeal.

5. That interest of justice demands that the present application may be allowed and the delay in filling instant appeal may be condoned so that the matter can be adjudicated upon on its merit.

It is, therefore, most humbly prayed that this application may kindly be allowed and the delay may kindly be condoned and the matter may kindly be heard on its merit in the interest of justice.

Such other orders as deemed tit and proper in the facts and circumstances of the case may kindly be passed.

Through -

Muhammad Amin Khattak Lachi Advocate Supreme Court.

Muhammad Yaseen HassanKhelvi Advocate High Court.

AFFIDAVIT

I Muhammud Amin Khattak Lachi ASC, do hereby solemnly aftirm and declare as the contents of Para's of the accompanying application are correct and true to the best of my knowledge and belief.

DEPONENT

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. /2023

Waqar Ahmad S/o Sanobar Khan,

VERSUS

The District Education Officer & others.

Appellant:

Waqar Ahmad S/o Sanobar Khan, R/O Lachi, Payyan District Kohat.

Respondents:

- A. The District Education Officer (DEO) Male, Kohat.
- B. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
- C. I'he Secretory Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

Through:

Muhammad Amin Khattak Lachi

Advocate, Supreme Court.

Muhammad Yaseen HassanKhelvi Advocates, High Courts.

Appellant



(BETTER COPY)

Registered DIRECTORATE, ELEMENTARY & SECONDARY EDUCATION,

KHYBER PAKHTUNKHWA PESHAWAR.

WHEREAS, you. Mr. Waqar Ahmad SPET GHSS Lachi Kohat proceeded for having committed the following acts which consists inefficiency and misconduct under Rules-3 (a) & (b) and Rule-9 of Khyber Pakhtunkhwa (Efficiency & Discipline) Rules-2011 as follow: -

WHEREAS, The District Education Oficer (Male) Kohat vide letter No. 9642 dated 18-12-2019 recommended Major Penalty "Removal from Service" under E&D Rules-2011 upon Mr. Waqar Ahmad SPET GHSS Lachi Kohat as you remained willful absent from duty w.e.f. 02-09-2019 without any prior permission and FIRwas also lodged against you under PPC. 302/324/34/427 dated 05-08-2019 in Police Station Lachi District Kohat.

WHEREAS, as per report of the District Education Officer (Male) Kohat vide Memo No. 9641 dated. 18-12-2019 that absent notices were issued to you on your home address by the Principal Government Higher Secondary School Lachi Kohat i.e. 1st Notice bearing Endst No. 473 dated. 05-09-2019, 2nd Notice No. 475 dated. 11-09-2019 and third Notice vide letter No. 477 dated. 16-09-2019 to resume duty. But you failed to report for duty at GHSS Lachi Kohat.

WHEREAS, a Show Cause notice was issued to you by the District Education Officer (Male) Kohat vide Memo No. 8307 dated. 16-10-2019 that "you are involved and guilty of willful absence, inefficient, irresponsible".

WHEREAS, as per Show Cause Notice issued by District Education Officer (Male) Kohat vide Memo No. 8307 dated 16-10-2019. You were informed that, if no reply to the notice dated 16-10-2019 received within 07 or not more than fifteen days of its delivery. It shall be presumed that you have no defence to put-in and in that case \(\) an exparte action will be taken against you.

WHEREAS, final Show Cause Notice was published by the District Education Officer (Male) Kohat in Daily Mashriq dated. 23-11-2019 wherein, once again you were directed to resume duty within 15 days after publishing of Show Cause notice.

WHEREAS, again you failed to report to the District Education Officer (Male) Kohat for onward duty at your station i.e. GHSS Lachi Kohat.

AND WHEREAS, it is established that you have no defence to put in and the charges levelled against you by the Principal GHSS Lachi Kohat and District Education Officer (Male) Kohat are proved.

NOW THEREFORE, the competent authority (Director E&SE) Khyber Pakhtunkhwa in exercise of power conferred upon him under Sub Rule-3(a), (b) and Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 is pleased to imposed Major Penalty of "Removal from Service" upon Mr. Waqar Ahmad SPET GHSS Lachi Kohat with immediate effect.

DIRECTOR

Elementary & Secondary Education . Khyber Pakhtunkhwa, Peshawar. Dated Peshwar the 06.02.2020

Endst: No. 7740-44 / A-25/Kohat Vol-IV/PET, SPET, DPE

Copy forwarded for n/a to the.

1. District Education Officer (M) Kohat with reference to his letter No. 9641 dated 18-12-2019.

MITALED

- 2. District Account Officer Kohat.
- Principal GHSS Lachi Kohat.
- Mr. Waqar Ahmad SPET GHSS Lachi Kohat.

PA to Director E&SE Directorate Khyber Pakhtunkhwa Peshawar.

(Sd)

Assistant Director (s) Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.



(BETTER COPY)

Registered DIRECTORATE ELEMENTARY & SECONDARY EDUCATION,

KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION:-

WHEREAS, you. Mr. Waqar Ahmad SPET GHSS Lachi Kohat proceeded for having committed the following acts which consists inefficiency and misconduct under Rules-3 (a) & (b) and Rule-9 of Khyber Pakhtunkhwa (Efficiency & Discipline) Rules-2011 as follow:-

WHEREAS, The District Education Officer (Male) Kohat vide letter No. 9642 dated 18-12-2019 recommended Major Penalty "Removal from Service" under E&D Rules-2011 upon Mr. Waqar Ahmad SPET GHSS Lachi, Kohat as you remained willful absent from duty wef. 02-09-2019 without any prior permission and FIR was also lodged against you under PPC 302/324/34/427 dated 05-08-2019 in Police Station Lachi District Kohat.

WHEREAS, as per report of the District Education Officer (Male) Kohat vide Memo No. 9641 dated. 18-12-2019 that absent notices were issued to you on your home address by the Principal Government Higher Secondary School Lachi Kohat i.e. 1st Notice bearing Endst No. 473 dated 05-09-2019, 2nd Notice No. 475 dated 11-09-2019 and third Notice vide letter No. 477 dated 16-09-2019 to resume duty. But you failed to report for duty at GHSS Lachi Kohat.

WHEREAS, a Show Cause notice was issued to you by the District Education Officer (Male) Kohat vide Memo No. 8307 dated 16-10-2019 that "you are involved and guilty of willful absence, inefficient, irresponsible.

WHEREAS, as per Show Cause Notice issued by District Education Officer (Male) Kohat vide Memo No. 8307 dated 16-10-2019. You were informed that, if no reply to the notice dated 16-10-2019 received within 07 or not more than fifteen days of its delivery. It shall be presumed that you have no defence to put-in and in that case an exparte action will be taken against you.

WHEREAS, final Show Cause Notice was published by the District Education Officer (Male) Kohat in Daily Mashriq dated 23-11-2019 wherein, once again you were directed to resume duty within 15 days after publishing of Show Eause notice.

WHEREAS, again you failed to report to the District Education Officer (Male) Kohat for onward duty at your station Le. GHSS Lachi Kohat.

AND WHEREAS, It is established that you have no defence to put-in and the charges levelled against you by the Principal GHSS Lachi Kohat and District Education Officer (Male) Kohat are proved.

NOW THEREFORE, the competent authority (Director E&SE) Khyber Pakhtunkhwa in exercise of power conferred upon him under Sub Rule-3(a), (b) and Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency, & Discipline) Rules, 2011 is pleased to imposed Major Penalty of "Removal from Service upon Mr. Waqar Ahmad SPET GHSS Lachi Kohat with immediate effect.

DIRECTOR

& Secondary F

Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. Dated Peshawar the 06.02.2020

Endst: No. 7740-44/A-25/Kohat Vol-IV/PET, SPET, DPE

Copy forwarded for n/a to the.

- 1. District Education Officer (M) Kohat with reference to his letter No. 9641 dated 18-12-2019.
- 2. District Account Officer Kohat
- 3. Principal GHSS Lachi Kohat
- 4. Mr. Waqar Ahmad SPET GHSS Lachi Kohat
- 5. PA to Director E&SE Directorate Khyber Pakhtunkhwa Peshawar.

(Sd)

Assistant Director (s)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

et skiel

DIRECTORATE OF ELEMENTARY & SECONDALY EDUCATION KHYBER PARHTUNKHWA, PESHAWA

WHEREAS, You, Mr. Wagar Ahmad, SPET GHSS Lachi Koli a proceeded for having committed the following and a lack of the control of the lack of the control of the lack of the control of the lack of the following acts which consists audificancy and misconduct under Rule 3 (a) & (b) and Rule 9 of ishyber not be a consist audificancy and misconduct under Rule 3 (a) & (b) and Rule 9 of ishyber Pakhtuahhwa (Efficiency & Discurface) Ref.s-2011 as folious

WHEREAS. The District Education 1 of colader 11 and cade letter No. 6043 dated 18-12-2019 recommended Major Penalty "Removas fro, a service" moles facts Rules 2011 upon, "Mr. Wagar Ahmad, Super curee to an action of the control of SPET GHSS Lacin Kyhat) as yen reggindi willful absent from day weed 62-49-2019 without any print permission of CCO. peumission and i IR was also helged actins; you timber the \$42, 124, do - 27 cares show they in Police. Station Light Dieselants Station Lachi District Kohat.

WHEREAS, as per report of the District Education Office: (Males Kohat vide Memo No. 9641) dated 18-12-2019, that absent nedices were issued to you on your name address by the Principal Government. Higher Secondary School Linchi Kohat, Le 1° nonce hearing Encyt No. 473 dated 0540, 2019, 2° Notice No. 473 dated 0.540, 2019, 2° Notice No. 473 dated 0.540, 2019, 2° Notice No. 473 dated 0.540, 2019, 2° No. 475 dated 0.540, 2° No. 475 dated 11-09, 2019 and fluid Nerico vide letter No. 477 dated 16-19-2019 to resume duty, but you traded resemble 2 tailed jurieport for duty at GHSS hachi Robot

WHEREAS, a Show Cause notice was ablated to you by any Doublet Education Officer (Male) Kohat yide No. 8307 dated 10-10-2019 alter typic me involved in guilty of willful absence, inefficient, irresponsible".

WHEREAS, as per Show Cause Notice issued by District Education Officer (Male) Kohat vide Memo No 8307 dated 16-10-2019, you were informed that, if no reply to the notice dated 16-10-2019 received within seven (07) or not more than lifteen days of its delivery it shall be presumed that you have no delivere to pair in and in that case on exsporte action will be taken upoinst year

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WHEREAS, again you tailed to report to the District Education Officer (Male) Kolmt for onward duty at your station i.e GHSS Laclii Kohai.

AND WHEREAS, it is established that you have no defence to parsar and the charges be exceed against you by the Principal GHSS Lachi Kohat and District Education Officer (Male) Kohat are proved.

NOW THEREFORE, the competent authority (Director Ea/Sh) Khyber Pakhtunkhwa in exercise of power conferred upon him under Sub Rule-3 (a), (b) and Rule-9 of the Klayber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules. 2011 is pleased to imposed Vision Penalty of "Removal from Service" apon Mr. Waqar Ahmad. SPET GHSS Lachi Kona with manedage effect

DIRECTOR

Lienceitary & Secondary Linearron Shyber Pakhtuddaya Peshawar

Fodst No TM 6-MMA-25 Kolm, Polity PFT SPECIDE

Dated resiminar dated b = 2 - 2026

Copy legwarded for ma to the

District Education Officer (34) Kohar with reference to his fence No. 9641 dated 18-12-2019

District Accounts & Diggi Rebat

Principal Of ISBI achi. Robat Mr. Waqir Annad, SPFT GHSS La /- EoLa

PA a Day Host Dagman Myon it.

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NOTIFICATION:-

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WHEREAS, as per report of the District Education Officer (Male) Kohat vide Memo No. 9641 dated. 18-12-2019 that absent notices were issued to you on your home address by the Principal Government Higher Secondary School Lachi Kohat i.e. 1st Notice bearing Endst No. 473 dated 05-09-2019, 2nd Notice No. 475 dated 11-09-2019 and third Notice vide letter No. 477 dated 16-09-2019 to resume duty. But you failed to report for duty at GHSS Lachi Kohat.

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DIRECTOR
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 7740-44/A-25/Kohat Vol-IV/PET, SPET, DPE

Dated Peshawar the 06.02.2020

Copy forwarded for n/a to the.

- 1. District Education Officer (M) Kohat with reference to his letter No. 9641 dated 18-12-2019.
- 2. District Account Officer Kohat
- 3. Principal GHSS Lachi Kohat
- 4. Mr. Wagar Ahmad SPET GHSS Lachi Kohat
- 5. PA to Director E&SE Directorate Khyber Pakhtunkhwa Peshawar.

Assistant Director (s)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

1869 /A-25/Complaint/PETs/SPETs/ (M) Dated Peshawar the: 23 10 · /2023

The District Education Officer (Male) Kohat.

Subject: -

REQUEST FOR GUIDANCE.

I am directed to refer to the subject cited above and to enclose herewith a copy of letter received from SO (Primary Male) vide his letter No. SO(Primary-M)E&SED/5-19/Reinstatement/Mr. Waqar Muhammad/Ex-SPET/Kohat/2023 Dated: 14/09/2023 in respect of Mr. Waqar Muhammad Ex-SPET at GHSS Lachi Kohat for your kind perusal and early provision of following requisite record/information to this office to proceed further into the matter please.

- 1. Copy of the FIR.
- 2. Copy of the Judgment of Additional District & Session Judge-II, Kohat whereby the accused has been acquitted from the charges in the criminal case.
- 3. Status of the appeal (if any) against the Judgment under reference of the aggrieved/opponent party which is to be obtained from the Additional Registrar Judicial Peshawar High Court.

ASSISTANT DIRECTOR Elementary & Secondary Education Khyber Pakhtunkhwa Peshindar

Endst No.

Copy forwarded to: -

1. Section Officer (Primary-Male) E&SE Department w/r to his letter, & Date as cited above. 2. PA to Director E&SE local Directorate.

ASSISTANT DIRECTOR Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR



No. 1809/A-25/Complaint/PET/SPETS/(M)
Dated Peshawar the: 23/10 /2023

Τò

The District Education Officer (Male) Kohat

Subject:-

REQUEST FOR GUIDANCE.

I am directed to refer to the subject cited above and to enclose herewith a copy of letter received from SO (Primary Male) vide his letter No. SO(Primary-M)E&SED/5-19/Reinstatement/Mr. Waqar Muhammad/Ex-SPET/Kohat/2023 Dated: 14/09/2023 in respect of Mr. Waqar Muhammad Ex-5rei at GriSS Each Kohat for your kind perusal and early provision of following requisite record/information to this office to proceed further into the matter please.

- 1. Copy of the FIR.
- 2. Copy of the Judgment of Additional District & Session Judge-II, Kohat whereby the accused has been acquitted from the charges in the criminal case.
- 3. Status of the appeal (if any) against the Judgment under reference of the aggrieved/opponent party which is to be obtained from the Additional Registrar Judicial Peshawar High Court.

Sd/ASSISTANT DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No.____/

Copy forwarded to:

- 1. Section Officer (Primary-Male) E&SE Department w/r to his letter, & Date as cited above.
- 2. PA to Director E&SE local Directorate.

Sd/-ASSISTANT DIRECTOR

Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar مجتنور برنا مید و از کر کرمها حب ESE نیم بختونخو اور به وز انوان انگراندارای امال(Reinstatement) SPET کردتان و بالا درخان درخ

ر برکانین کا ترکارماکی برگران کانم دو تمها رماکه بودانی بازید 17.6.2023 کوالا= جن کرد دار (نفولات سده منالعداند ان)

يكرسال بال يج وارب اوروكرى كرواول وبدا دوور بديد

ابد المستوعات المستوري المستو

منتاج ما دو فر با يا جارت مده من و الدوس أراع و الدفر عن الله المساورة كان ولا في جاسة -

اله مدوله مورد بال تلدالا على إلى الله المستعمل المرابعة المرابعة

نيانية ب 03333711304

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بحضور جناب دُائرَ مِكثر صاحبESE خيبر پختونخواه پيثاور

عنوان: محكمانه البيل / بحال (Reinstatement)

ناب عالی! اپیلانٹ ذیل عرض کرتاہے۔

به که سائل تحصیل لا چی ضلع کوہاٹ کارہائش وباشندہ ہے۔

2. په که سائل محکمه ایجو کیشن در یپار شمنت میں بطور PET بھرتی ہوا جبکه میں SPET اور مختلف سکولوں میں بطریق احسان ویا۔

3 یہ کہ بدشتی سے سائل مور خہ 5 اگشت 2019 کو دشمیٰ کے شلنج میں پھنس کر سائل کے بھائی اور والد صنوبر خان پڑا گیا دائر کیا گیا

4. أن يه كه سائل كامخالف ايك بااثر شخصيت تقااور كوباث يجهر ى چوك ميں دن دھاڑے ميرے بھائى كوجو بوليس محكم ميں LHC تھا كو قتل كر ديا۔

5۔ یہ کہ سائل کو جان سے مارنے کے درپے تھے۔ اس لئے علاقہ میں رہائش رکھنا بہت مشکل تھا۔ اس لئے سائل اپنی جان بچانے کی ضاطر پنجاب شفٹ ہوا۔ اس کے باوجو دسائل کو معاف نہیں کیا۔ مخالفین کی اور بھی بھی جگہ پر دشمنی قتل مقا تلہ تھے۔ سائل کو سرکاری نوکری کی بناء پر ملوث کرتے رہے۔ حالانکہ ہم گاؤں سے دور رہائش پزیر تھے۔

6 یہ کہ مخالفین کو آخر کار سائل کی بے گناہی کاعلم ہوہی گیااور سائل کوعدالت مجازنے مور خد 7.6.2023 کو باعزت برائی گرادیا۔

7. پیر کہ سائل بال بیچ دارہے اور نوکری کے سواکوئی ذریعہ آمدن نہیں ہے۔

8 یہ کہ سائل اپنی بر طرفی کو مزید قانونا DISCUSS کرنے کی بجائے مجاز تھارٹی کی صوابدید پر چپوڑ تاہوں گُ

لہٰذا استدعاہے کہ درخواست / اپیل طذا کو حقائق بالا کی روشیٰ میں انسانی جمدردی کے پیش نظر DEO / ڈائر یکٹر صاحب کا آرڈر نمبر 7740-44A725ICT مور خد 6.2.2020 کو منسوخ فرما جاکر سائل کو نوکری پڑ Reinstate / دوبارہ بحال کئے جانے کا حکم صادر فرمایا جاوے۔ ویگر دادر سی قرین جو قرین انصاف ہو بھی دلائی جائے۔

> العارض -/Sd

و قار احمه ولد صنوبر خان سكنه لا جي پايان

سابقSPE_T گورنمنٹ ہائیر سینڈری سکول تحصیل لا پی کوہاٹ

رابطه نمبر03333711304



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

NOTIFICATION

Consequent upon approval of the Competent Authority, (Director Elementary & Secondary Education Khyber Pakhtunkhwa), a committee comprising upon the following Officer/Official is hereby constituted to probe into the matter and redress the grievances of the appellant namely Mr. Waqar Muhammad Ex-SPET BS-16 GHSS Lachi District Kohat regarding Appeal for Re-instatement in Service.

1. Mr. Mushtaq Ahmad Deputy Director Estab (M-II) Local Directorate Chairman

2. Mr. Javid Khan Legal Representative (Litigation-I) Local Directorate (Member)

The committee is requested to submit detail report with clear recommendations within 10 days.

DIRECTOR

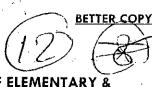
Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

/A-25/Complaint/PETs/SPETs (M) Dated Peshawar the: $-23 \cdot 11/2023$ Copy of the above is forwarded to the: -

1. All Officials/Officers concerned.

2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.

Assistant Director (Sports) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

NOTIFICATION

Consequent upon approval of the Competent Authority, (Director Elementary & Secondary Education Khyber Pakhtunkhwa), a committee comprising upon the following Officer/Official is hereby constituted to probe into the matter and redress the grievances of the appellant namely Mr. Waqar Muhammad Ex-SPET BS-16 GHSS Lachi District Kohat regarding Appeal for Re-instatement in Service.

- 1. Mr. Mushtaq Ahmad Deputy Director Estab (M-II) Local Directorate Chairman
- 2. Mr. Javid Khan Legal Representative (Litigation-1) Local Directorate (Member)

The committee is requested to submit detail report with clear recommendations within 10 days.

DIRECTOR

Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Endst: No.9193-96/A-25/Complaint/PETs/SPETs (M) Dated Peshawar the: -23/11/2023 Copy of the above is forwarded to the:

- 1. All Officials/Officers concerned.
- 2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.

Sd/-

Assistant Director (Sports)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

APPOINTMENT/ADJUSTMENT

Consequent upon the approval of District Selection (appointment committee Kohat the appointment adjustment). I trained conditator (Open the approval of District Selection (appointment committee Kohat the appointment adjustment). the following PET trained candidates (Open Merit/ Batchwise Merit) are hereby ordered against the post of PET in BPS-09 (Rs 2410-194-6760) plus usual allowance as other Batchwise Merit) are hereby ordered against the post of PET in BPS-09 (Rs 2410-194-6760) plus usual allowances as admissible under the rules on contract basis, for the period of Thice years and posted in the schools as noted against each in the interest of Public service with effect from the date of their taking over charge.

	i heir contact is so	hool specific.	The state of the contract of t				'
\$ #	Name of Candidate/Father Name	Permanent Home address	Appointed at	Ment Position Fear of Passing the PLT Figure	Vice	Teacher in Col. No. 6 adjusted at	Remarks
_ 1	2			i.,		the Chool	
1	Ikram Ullah S/O Mahammad Ashraf	Vill Lachi Bala	GMS Chichana	5 ; "	Agamst		Vacant Post
2	Gul Daraz Khan S/O Sadullah Khan	Vill Shakardarra	GHS Muslim	3	Vacant Post Vacant Post	1	Machin Prist
	T		Batchwise	i Marit			•
1	Mansoor Hayat S/O Umar Hayat	Behzadi Ch. Kot	GHS No. 1 Kohat	l i	Intikhab	GHSS	Vacant Post
2	Faisal Nadeem S/O Abdul Qayyum	Belizadi Ch: Kot	GCMHS for Boys Kollint (GHS No: 4)	2	Sher	Gumbat GHS 1 Khadizas	Vacant Post
3	Tariq Mchmood S/O Muhammad Javid	Vill Billitang Koltat	GHS Siab	3	Vacant Post		Vacuat Post
<u> </u>	Waqar Ahmad S/O Sanobar Khan	Vill Lachi Bala Kohat .	GHS Malgin Kohat	4	Vacant Post	- ;	Vacant Post

TERMS AND CONDITIONS OF THEIR APPOINTMENTS

- They will sign the agreement form before joining Service.
- The Candidates will enter into an agreement with the Government and will be Governed by the terms and conditions hereinafter 2. mentioned in such agreement.
- The Candidate should provide a surely Bond as well as agreement bond executed by the each Candidate to obey contract policy and will have no right to challenge the Policy in any Court of Law.

 They will not be considered for regularization at any stage and they will not claim their Semonty as PET.

- They will not be considered for regularization at any stage and they will not claim their Senority as PET They will be governed by such rules and regulations as may be issued from time to time by the Govi Their Services can be terminated at any time in case their performance is found unsatisfactory and they will be proceeded against under the removal from Service (Special Power)Ordinance2000 and E&D Rules 1973. They are required to produce Health and Age Certificate from Medical Authority concerned before taking over charge. They will produced the Bank receipts for the fee deposited in connection with Verification of their Certificates/Diploma/Degrees and other testimonials before handing/taking over charge through the Principals/Headmaster concerned to this office and in case of their documents if proved fake, their appointment will be considered as cancelled without any right or provided. of their documents if proved fake, their appointment will be considered as cancelled without any right or privilege. The concerned DDOs will not draw their Pay till the process of verification of their documents is completed.
- NO TA/DA etc is allowed.

CAPT: # TARIO HAY AT DISTRICT CO ORDINATION OFFICER

-2248 /Appti:/Adjustment/PET/I-AE Endst No. A. A. A. Copy of the above is forwarded for information and necessary action to the -

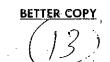
SOHAT. Dated Kohat the 63/63

- PS to Secretary Govt: of NWFP Schools & Literacy Department Peshawar
- PA to Director Schools & Literacy NWFP Peshawar.
- 3.
- PA to District Nazini Kohat
 PA to District Co Ordination Officer Kohat
 District Account Officer Kohat with the request that the hills of the above named candidates may not be honored till the verification of their certificates/Degrees etc from the concerned authorities duly authenticated by this office.
- 6. Chairman Education Monitoring Committee Kohat.
- All the Principals/Hendmasters/DDOs concerned with the remarks to Complete the process of handing/taking over charge immediately on the provision of digural copy of appointment order
- All the Candidates/teachers concerned with the remarks to comply with the orders with our any delay
- 21 ADO (Estab:) Local Office
- 22 23 PA to Executive District Officer (Schools & Literacy) Kohat-
- Accountant Middle Schools (Local Office) Kohat

24 Master file

SCHOOLS & LITERACY ACHA

Cambeanaer



OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & & LITERACY) KOHAT APPOINTMENT ADJUSTMENT

Consequent upon the approval of District Selection Appointment committee Kohat the appointment/adjustment of the following PET trained candidate (Open Merit/ Batchwise Merit) are hereby ordered against the post of PET in BPS-09 in (Rs. 2410-194-6760) plus usual allowances as admissible under the rules on contract basis, for the period of Three years and posted in the schools as noted against each in the interest of Public service with effect from the date of their taking over charge:-

Thoir	contact	ic	school	specific.

\$ #	Name of Candidate/Father Name	Permanent Home address	Appointed at	Merit position Year of Passing the PET Exam	Vice	Teacher in . Col. No. adjusted at the school	Remarks
1	2	3	4	5	- 6	7	8
1	Ikranı Ullah S/O Muhammad Ashraf	Vill Lachi Bala	GMS : Chichana	1	Against Vacant Post		Vacant Post
2	Gul Daraz Khan S/O Sadullah Khan	Vill Shakardarra	, GHS Muslim ' Abad	2	Vacant Post		Vacant Post
		' ,	Batchwise M	erit			,
1	Mansoor Hayat S/O Umar Hayat	Behzadi Ch: Kot	GHS No: 1 Kohat	1	Intikhab Gul	GHS Gumbat	Vacant Post.
2	Faisal Nadeem S/O Abdul Qayyum	Behzadi Ch: Kot	GCMHS for Boys Kohat (GHS No: 4)	2	Sher Abbas	GHS Khadizai	Vacant Post
3	Tariq Mehmood S/O Muhammad Javid	Vill Billitang Kohat	GHS Siab	3	Vacant Post	•	Vacant Post
4	Waqar Ahmad S/O Sanobar Khan	Vill Lachi Bala Kohat	GHS Malgin Kohat	4	Vacant Post	-	Vacant Post

TERMS AND CONDITIONS OF THEIR APPOINTMENTS

- 1. They will sign the agreement form before joining Service.
- 2. The Candidates will enter into an agreement with the Government and will be Governed by the terms and conditions hereinafter mentioned in such agreement.
- 3. The Candidate should provide a surety Bond as well as agreement bond executed by the each Candidate to obey contract policy and will have no right to challenge the Policy in any Court of Law.
- 4. They will not be considered for regularization as stage and they will not claim their Seniority as PET.
- 5. They will the governed by such rules and regulations as may be issued from time to time by the Govt.
- 6. Their Services can be terminated at any time in case their performance is found unsatisfactory and they will be proceeded against under the removal from Service (Special Power) Ordinance, 2000 and E&D Rules, 1973.
- They are required to produce Health und Age Certificate from Medical Authority concerned before taking over charge.
- 8. They will produce the Bank receipts for the fee deposited in connection with Verification of their Certificates/Diplomas/Degrees and other testimonials before handing/taking over charge through the Principals/Headmaster concerned to this office and in case of their documents if proved take, their appointment will be considered as cancelled without any right or privilege.
- 9. The concerned DDOs will not drain their Pay till the process of verification of their documents is completed.
- 10. NO TA/DA etc is allowed.

CAPT: R TARIQ HAYAT
DISTRICT CO ORDINATION OFFICER
KOHAT

Endst No.2226-2248/Apptt:/Adjustment/PET/I-AE

Dated Kohat the 03/03/2004

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

- 1. PS to Secretary Govt: of NWFP Schools & Literacy Department Peshawar.
- 2. PA to Director Schools & Literacy NWFP Peshawar.
- 3. PSO to District Nazim Kohat.
- 4. PA to District Co Ordination Officer Kohat.
- District Account Officer Kohat with the request that the bills of the above named candidates may not be honored till the verification of their certificates/Degrees etc from the concerned authorities duly authenticated by this office.
- Chairman Education Monitoring Committee Kohat.
- 7-13 All the Principals/Headmasters/DDOs concerned with the remarks to Complete the process of handing/taking over charge immediately on the provision of original copy of appointment order.
- 14-20 All the Candidates/teachers concerned with the remarks to comply with the orders without any delay.
- 21 ADO (Estab:) Local Office.
- 22 PA 10 Executive District Officer (Schools & Literacy), Kohat
- 23 Accountant Middle Schools (Local Officer) Kohat
- 24 Master file

Sd/DISTRICT OFFICER (MALE)
SCHOOLS & LITERACY KOHAT

DEFICE OF THE DISTRICT EDUCATION OF THE DISTRICT EDUCATION

MOTIFICATION

Committee and in pursuance of the Govt: Of Khyber Pakiannkhwa Elementary & Secondary Education Notification No.SO(B&A)/1-18/E&S1/2012 dated 11.07.2012 and Director (E&SE) Notification No.4496-4501 dated 21.02.2013, the following Male PETs B-15 are hereby promoted to the post of Senior PETs BPS-16(Rs: 0000-S00-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Government, on terms and condition given below with immediate effect and further they will be posted in the Government Higher.

Seco	ndary/H	ligh schools noted against each.	ill be posted in the Governm	ient Higher
-	Sn.#	Teacher Name	j	-
1	1	Atta Khan	School	Remarks 1.5
. !	1 1		GMS Baraghzi Kalan	GHS Lachi Payan
. '	"!	•	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	in place of Favor
L'	i . '	1		Ahmed GMS
2	2	Fazle -m- Muhammad	<u>l</u>	BaraghzailKalan
3	3	Javed Khan	GHS Lal Garhi	Already Occupied
	1 '	Tariou Mini	GMS Baqizai	I. GHS! Dhoda'in
.'	! '	1		place of
	[. /	1 in ingress		Muhammad Asir
-1	4	Walnut Transaction Allend		CMS.Bagizai
	1	Waheed U Zaman	GMS Kunder	GHSS Gumbat in
1	13		! ! ! :	Pirios Comparin
5		Muhamamd Akbar	GHSS Gumbat	place of M.Nisar
	6	Muhamamd Nagib	GHSS landi Kachai	Already Occupied:
7	7.	Bilal Khan	GHS Telani Jadeed	ido-
8	8	Raham Zad Khan	GHS Nasrat Khel	-do- 1 .c :
9	9	Malik Jan	GMS Gurgura	-do-
		1	Otal Otalina	GHSS Lachi in
10	10	Ahmad Gol	CHE ME TO THE	Iplace Gul anan
11	11	Shor Mahammad	GHS Mir Banda Jarma GHS No.3 Kohat 'e	Already Occupied
12	12	Manzoor Khan	GHS Jama	-do- -b-
13	13	Muhammad Asghar	C111010 4040	I-do- 1/20 :
14	14	Ahmed Nawaz	GHS Nanoraka	-do- in i
15	15	Muhamand Faroog	GMS Kamar	-do- 1.13;
1		and a second	Olaro Villial	GHS Pershailin
	1 .		t i w	l place of Khalid
16	15	Shahsa war Ali	Zanis visit in the same of the	lmma (*)
17	17	Ama I Daraz	GHS C/Kot Bala	AireadyiOccupied
18	18	Muhamamd Ishaq	GHS No.2 Kohat	1-00 1-61:
19	19	Muhamaind Haroon	GHSS S/Dara	-do- : is
20	1:5-	Rahim Gul	GHS No.3 Kohat	-do- 1.3:
1	1.0	Ranim Gui	GMS Paka Topi	GIISS Dhand
1			1 :	Sashri in place of
1	1			Mustakeem Khan
21	121	Orbal Khan	1	widstakcem Khan
22	22	Zi hid Ighal	GHS Kirosam	-40- 111:
23	23	S takir Bilal	GHS Shewaki	-do- 1:40
	-	e men Dim	CMS Gridam Banda	GI SS Togh Bula in
4	مسياه س		すり 1 / 2 第	Biling of Madeni





OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

NOTIFICATION

Consequent upon the recommendation of the Departmental Selection Committee and in pursuance of the Govt: Of Khyber Pakhtunkhwa, Elementary & Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Director (E&SE) Notification No.4496-4501 dated 21.02.2013, the following Male PETs B-15 are hereby promoted to the post of Senior PETs BPS-16 (RS: 10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Government, on terms and condition given below: with immediate effect and further they will be posted in the Government

Higher Secondary/High schools noted against each.

\$.#	Sn.#	Teacher Name	School	Remarks
1	1	Atta Khan	GMS Baraghzi Kalan	GHS Lachi Payan
				in place of Fayaz
				Ahmed GMS
				Baraghzai Kalan
2	2	Fazle-m-Muhammad	GHS Lal Garhi	Already Occupied
.3	3	Javed Khan	GMS Baqizai	GHS Dhoda in
				place of
				Muhammad Asif
				GMS Baqizai
4	4	Waheed U Zaman	GMS Kander	GHSS Gumbat in
				place of M.Nasir
5	5	Muhammad Akbar	GHSS Gumbat	Already Occupied
6	6	Muhammad Nagib	GHSS Landi Kachai	-do-
7	7	Bilal Khan	GHS Telani Jadeed	-do-
8	8	Raham Zad Khan	GHS Nasrat Khel	-do-
9	9	Malik Jan	GMS Gurgura	GHSS Lachi in
				place of GuJanan
10	10	Ahmad Gul	GHS Mir Banda Jarma	Already Occupied
11	11	Sher Muhammad	GHS No.3 Kohat	-do-
12	12	Manzoor Khan	GHS Jarma	-do-
13	13	Muhammad Asghar	GHSS S/Dara	-do-
14	14	Ahmed Nawaz	GHS Nandraka	-do-
15	15	Muhammad Faroog	GMS Kamar	GHS Pershai in
	<i>i.</i> .			place of Khalid
			•	Imran
16	16.	Shahsawar Ali	GHS C/Kot Bala	· Already Occupied
17	17	Amad Daraz	GHS No.2 Kohat	-do-
18	18	Muhammad Ishaq	GHSS S/Dara	-do-
19	19	Muhammad Haroon	GHS No.3 Kohat	-do-
20	20	Rahim Gul	GMS Paka Topi	GHSS Dhand
20	- 4			Saghri in place of
.		,		Mustakeem Khan
21	21	Qabal Khan	GHS Kirosam	-do-
22	22	Zahid Iqbal	GHS Shewaki •	-do-
23	23	Shakir Bilal	GMS Ghulam Banda	GHSS Togh Bala in
1.23	1.	C. GRI DIG	/	place of Naeem
	1			Khan



24	Saced Ur Rehman		(15/_	- Occupied
25	Shahid Bilal	GHS Behzadi	(7)	A ready Occupied
27	Ijaz Khan	GCHS Kohat l		-(0-: -(0-:
28	Tariq Mahmood	GHS Tappi		-00-
29		GHSS Billitan		-(0-! , :
30	Gul daraz Khan	GCMHS Mus		-00-1
-	Waqar Alımçd	GHSS Lachi		-do-i : 1 1
31	Mansoor Khan	GHSS No.1 K	mar .	-do-1
132 1	Paisal Nadcem".	GCMHS No.4	Kohal	
2	Conditions: hey will be on probation for perine year. They will be governed by such ruline to time by the Govt. Their Services can be terminated found unsatisfactory during probability will be preceded under the rules. Charge report should be submitted. Their inter-se-seniority on lower No TA/DA is allowed for joining. They will give an under taking to effect that if any over payment is recovered and if he is wrongly proceeded and if he is wrongly proceeded. PA to Director E&SE Khyber P. District Accounts Officer Kohal Principal/HM concerned.	lat any time. In attonary period, framed time to to all concern post will remain this duty. The be recorded in a made to him in romoted he will build to him in romoted he will be will be a latent to him in the will b	extendable for an analysis are may issue this perform in case of misco ime. cd. their service book light this order to be reserved. (IMTIAZ UL H. OUCATION OFF (MALE) KOHA 2-1 C. 2-	no her cal room name of is name of is all of is al
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•		,	i.	
12. mar 12. 1 12. mar 12. 1	PHT Promot	•1•••		



24	24	Saeed Ur Rehman	GHS Behzadi C/Kot	Already Occupied
25	25	Shahid Bilal	GCHS Kohat	-do-
27	27	ljaz Khan	GHS Tappi	-do-
28	28	Taria Mahmood	GHSS Billitang	-do-
29	29	Gul Daraz Khan	GCMHS Muslim Abad	-do-
30	′30	Wagar Ahmed	GHSS Lachi	-do-
31	31	Mansoor Khan	GHSS No.1 Kohat	-do-
32	32	Faisal Nadeem	GCMHS No.4 Kohat	-do-

Terms and Conditions:

- 1. They will be on probation for period of one year extendable for another one year.
- 2. They will be governed by such rules and regulations as may issue from time to time by the Govt.
- 3. Their Services can be terminated at any time. In ease his performance is found unsatisfactory during probationary period, in case of misconduct, he will be preceded under the rules framed time to time.
- 4. Charge report should be submitted to all concerned.
- 5. Their inter-se-seniority on lower post will remain intact.
- 6. No TA/DA is allowed for joining his duty:
- 7. They will give an under taking to be recorded in their service book to effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reserved.

(IMTIAZ UL HAQ)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst No.1262/PET Promotion

Dated 21/02/2023

Copy to:

- 1. PS to Secretary to Govt: Khyber Pakhtunkhwa E&SE Peshawar.
- 2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
- 3. District Accounts Officer Kohat.
- 4-43. Principal/HM concerned.

Sd/-Dy: District Edu: Officer (Male) Kohat

(16)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS& LITERACY) KOHAT.

TRANSFER.

Consequent Upon the relexation of Ban from the Competent authority Mr. Waqar Ahmed PET GHS Malgin Kohat is hereby transferred to GHS Sudal Kohat against the vacant Post of PET on his own Pay and grade in the interest of public service with immediate effect.

NOTE. 1. Charge report should be sent to all concerned.
2. No TA/DA etc is allowed.

(MUHAMMAD KHAN) EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY KOHAT.

Endst:No. 1/095-9/ F-Transfer of PET Dated 2 /10 /2007

Copy forwarded for n/a to the:-

- Headmaster GHS Malgin Kehat.
- 2. Headmaster GHS Sudal Kehat.
- District Accounts Officer, Kehat.

LP

Seamed by EamSeamer



OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY), KOHAT

TRANSFER.

Consequent upon the relaxation of Ban from the Competent authority Mr. Waqar Ahmed PET GHS Malgin Kohat is hereby transferred to GHS Sudal Kohat against the vacant Post of PET on his own Pay and grade in the interest of public service with immediate effect.

NOTE. 1. Charge report should be sent to all concerned.

2. No TA/DA etc is allowed.

(MUHAMMAD KHAN)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY KOHAT.

Endat: No.11095-97/F-Transfer of PET Dated 2/10/2007

Copy forwarded for n/a to the:-

- Headmaster GHS Malgin Kobat.
- 2. Headmaster GHS Sudal Kohat.
- 3. District Accounts Officer, Kohat.

Sd/DISTRICT OFFICER
SCHOOLS & LITERACY (MALE)
KOHAT

OF THE EXECUTIVE DISTRICT OFFICER (ELEM ETARY & OFCY:) ELE

TRANSES.

Consiguent upon the relaxation of ban and approval of the competant authority Mr. Wagar Ahmad, PET CHS Sudal Kohat is hereby trensferred to GHSS Lachi Kohat against Leave vacany Perture the mate com Khan PET and his Leave vacany is hereby ab Cued to Sucal Kebat in the interest of public service with the stable erect.

To see 1. Charge report should be sent to all concerned. 2. No TWO ACC IS allowed.

EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECY: & DUCATION KOHAT.

Dated 27/9

Secondary Education NWFP.

DISTRICT OFFICTR
ELECTRARY & SECTEDUS TION



OFFICE OF THE EXECUTIVE DISTRICT OFFICER (ELEMENTARY & SECY:), EDU

TRANSFER

Consequent upon the relaxation of ban and approval of the competent authority Mr. Waqar Ahmad, PET GHS Sudal Kohet is hereby transferred to GHSS, Lachi Kohat against Leave vacancy Pest of Mr. Mustaqeem Khan, PET and his leave vacancy is hereby shifted to GHS, Sudal Kehat in the interest of public service with immediate effect.

Note:- 1. Change report should be sent to all concerned.

2. NO TA/DA etc is allowed.

(IMTIAZUL HAQ)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECY: EDUCATION
KOHAT

Endst: No.11034-37/F-Transfer: of PETS Dated 27/9/2008.

Copy forwarded to the:-

- 1. Minister for Elementary & Secondary Education NWFP.
- 2. Principal, GHAS, Lachi Kohat.
- 3. Headmaster, GHS Sudal Kohat.
- District Accounts Officer, Kohat.

Sd/DISTRICT OFFICER
ELEMENTARY & SECY: EDUCATION
KOHAT

(18)

RELETVING CHIT

Kr wager Absed Per

Tou have been trainered to GHSS Lachi (Kohat) Vide Exactive District Cificer: Llementry & SECT Education Endst: No 11034-37/r-Transf: of PEIs Dated 27/09/2008.

You are Fereby railived of your duties this day the 30/09/08 AM and further direstadto report to the Principal GHSS Lachi (Kehat).

Ham Histor, Sudal, (K. ham) 9 / N

la Karen

RELIEVING CHIT



Mr. Wagar Ahmed PET

You have been transferred to GHSS Lachi (Kohat) Vide Executive District Officer Elementary & SECY Education Endst: No 11034-37/F-Transf: of PETs Dated 27/09/2008.

You are hereby relived of your duties thin day the 30/09/08 AM and further directed to report to the Principal GHSS Lachi (Kohat).

Sd/-Head Master, Govt. High School Sudal, (Kohat)

Dist. Govt. NWFP-Provincial District Accounts Office Kohat Monthly Salary Statement (September-2019)

Personal Information of Mr WAQAR AHMAD d/w/s of SANOBAR KHAN

Personnel Number: 00161170

CNIC: 14381570939

Date of Birth: 31.03.1981

Entry into Govt. Service: 04.03.2004

NTN:

Length of Service: 15 Years 06 Months 028 Days

Employment Category: Active Temporary

Designation: SENIOR PHYSICAL EDUCATION DDO Code: KT6060-Principal GHSS Lachi Kohat

80002912-DISTRICT GOVERNMENT KHYBE

Payroll Section: 002

GPF Section: 001

Cash Center:

223,807,00

GPF A/C No: EDU

Interest Applied: Yes

GPF Balance:

Vendor Number: -Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 16

Pay Stage: 10

Wage type	Amount	Wage type	Amount
OOO1 Basic Pay	34,110,00	1000 House Rent Allowance	2,727.00
1210 Convey Allowance 2005	5,000,00	1300 Medical Allowance	1,500.00 ~
2148 15% Adhoc Relief All-2013		2199 Adhoc Relief Allow @10%	503,00
2211 Adhoc Relief All 2016 10%	2.612.00	2224 Adhoc Relief All 2017 10%	3,411.00
2247 Adhoc Relief All 2018 10%	3,411,00	2264 Adhoe Relief All 2019 10%	3,411,00

Deductions - General

Wage	Amount Wage type			Amount		
3016 GPF Subscription		-3.340.00	3501	Benevolent Fund		-800.00
3609 Income Tax		-372.00	3990	Emp.Edu. Fund KPK		-150.00
4004 R. Benefits & Dea	th Comp;	-650.00				0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	197,000.00	-7,500,00	144,500.00

Deductions - Income Tax

Payable:

Recovered till SEP-2019:

1.116.00

Exempted: 0.95-

Recoverable:

3,339,90

Gross Pay (Rs.):

57,425,00

Deductions: (Rs.):

-12,812.00

Net Pay: (Rs.):

44,613,00

Payee Name: WAQAR AHMAD Account Number: PLS 8569-2

Bank Details: NATIONAL BANK OF PAKISTAN, 231452 LACHI LACHI KOHAT, KOHAT

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: LACHI BALA KOHAT

City: KOHAT

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address: City: ,

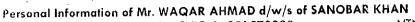
Email: wa31031981@gmail.com

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河南和州市河州港市最大町市区区(江江区



Dist. Govt. NWFP-Provincial District Accounts Office Kohat Monthly Salary Statement (September-2019)



Personnel Number: 00161170 CNIC: 14381570939

Date of Birth: 31.03.1981

Entry into Govt. Service: 04.03.2004

Length of Service: 15 Years 06 Months 028 Days

80002912-DISTRICT GOVERNMENT KHYBE

Employment Category: Active Temporary

Designation: SENIOR PHYSICAL EDUCATION

DDO Code: KT6060-Principal GHSS Lachi Kohat

Payroll Section: 002

GPF Section: 001 Interest Applied: Yes Cash Center:

GPF Balance:

223,807.00

GPF A/C No: EDU Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil *BP\$-16

Pay Stage: 10

	Wage type Amount			Wage type Amount		
0001	Basic Pay	34,110.00	1000	House Rent Allowance	2,727.00	
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00	
2148	15% Adhoc Relief All-2013	740.00	2199	Adhoc Relief Allow @ 10%	503.00	
2211	Adhoc Relief All 2016 10%	2,612.00	2224	Adhoc Relief All 2017 10%	3,411.00	
2247	Adhoc Relief All 2018 10%	3,411.00	2264	Adhoc Relief All 2019 10%	3,411.00	

Deductions - General

ļ - -	Wage type	Amount	1	Wage type	Amount
3016	GPF Subscription	13,340.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-372.00	3990	Emp. Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction Balance		
6505	GPF Loan Principal Instal	197,000.00	-7,500.00	144,500.00	

1,116.00

Deductions - Income Tax

Payable: 4,454.95

Recovered till SEP-2019:

Exempted:

0.95 Recoverable: 3,339.90

Gross Pay (Rs.):

57,425.00

Deductions: (Rs.):

-12,812.00

Net Pay: (Rs.):

Payee Name: WAQAR AHMAD Account Number: PLS 8569-2

Bank Details: NATIONAL BANK OF PAKISTAN, 231452 LACHI LACHI KOHAT, KOHAT

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: LACHI BALA KOHAT

City: Kohat

Domicile: NW - Khyber Pakhtunkhwa

House Status: No Official

Tein. Address:

Email: wa31031981@gmail.com

City:

System generated document in accordance with APPM 4.6 12.9 (Services/27.09.2019/16:35:43/old)

- All amounts are in Pak Rupees
- Errors & omissions excepted

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GENERAL NUMPO . 1317 R.S. John Para of 103 -31-1587-(49)

GOVERNMENT OF NORTH-WEST PROUTIER PROVINCE.

CERTIFICATE	OF	TRANSFER	:017	CHADOR
CONTRACTOR AND	O.P.	T 17 (17 (17 (17 (17 (17 (17 (17 (17 (17	- 1	3 J.L.) Kitay

i sateman sinat gasag N	water Adriau, F.E.T. 27th Mar, 2004
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G.H.S MAIGIN (KO	• • • • • • • • • • • • • • WIEL TRICEPING IN the Chales of the place of the Party Adams
#c 2226-2248/App	tt:/Adjustment/PET/I-AE dated 03.3.2004
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Station: Malgin	Designation G.T
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	149 dated 27-3-2004
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ii. The MASS	WANTAMAN, PA to Director School & Lit: NWFP Pesh:
	&L) Kohat.
3 Distt:	Accounts Offr: Kohat.
, PA to D	.C.O Kohat.
5. Office	Copy.
The charge of the	e Office of GHS Malgin(Kohat) III Post
was transferred from Mr	the state of the s
to Mr WAQAR AHMAD,	
fore on the	27.3.2004.
MAI	1 19 //
	Signature
	Disignation
	The second of th

GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE (2/



CERTIFICATE OF TRANSFER OF CHARGE

,	wr. wadar Anmaa, P.E.1 27 in Mar, 2004
1,	n taken over charge of the office of P.E.T Post at G.H.S
	reference to the Order of the E.D.O (S&L) KOHAT
	djustment/PET/I-AE dated 03.3.2004
transferring Mr.	
to G.H.S Malgin (Kohat)	
	and Important/Secret/Confidential documents handed
over/taken over are noted	i on the reverse.
Station: Malgin	Signature of relieved Sd/- Government Servant DOST MOHAMMAD
	Designation: C.T
Dated: Mar, 2004	Signature o Government Sd/- servant receiving charge: WAQAR AHMAD, P.E.T
	Designation:
Endst. No.146-149 dated	27-3-2004
From H.M G.H.S Malgin (I	(ohat)
To 1. PA to Director So	thool & Lit: NWFP Pesh:
2. E.D.O (\$&L) Koho	
3. Distt: Accounts O	
4. PA to D.C.O Koh	at.
5. Office Copy.	
The charge of the O	office of GHS Magil (Kohat PET Post
, was transferred from Mr. ($\#_J$
to Mr. WAQAR AHMAD, P	$H_{\mathcal{L}}^{\mathbf{L}}$
on the fore noon of the 27	
	Signature:
	Designation:

	$(\alpha \alpha)$
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Caste or race Khattuk	
Father : name Sanobar Kh	an
Residence Aschallan Sur	bar last
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Date of bimb (1981)	they seen any
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Personna) mark of identification. 143-87	-570939
Signature of the Official _ iguing	
Signature of head of office	the same of the sa
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MEDICAL CERTIFICATE

Name of Official	Waqar Ahmed.	
	•	
•		

Caste or race Khattak

Father's Name Sanobar Khan

Residence Mohallah Sarban Lachi Teh. & Distt: Kohat

Date of birth (1981)

Exact height by measurement 5' 3"

Personal mark of identification 143-81-570939

Signature of the Official Sd/-

Signature of head of office .

Seal of Office_____

I do hereby certify that I have examined Mr. Waqar Ahmed, a candidate for employment in the Office of the G.H.S Malgeen (as PET B-9) and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except NAD

I do not consider this as disqualification for employment in the office of Educ. Deptt: Kohat. His age according to his own statement 23 years and by appearance about twenty three years of age.

LEFT HAND THUMB AND FINGER IMPRESSIONS

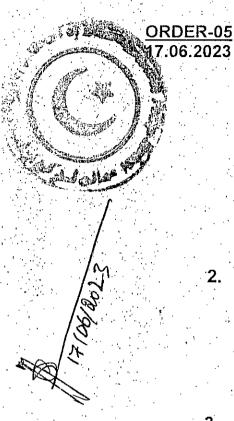
Medical Superintendent
Civil Hospital



IN THE COURT OF MUHAMMAD ISHAQ KHAN, ADDITIONAL SESSIONS JUDGE-II, KOHAT.

State Versus Waqar Ahmad & Other Case No.119/SC

(23)



APP for the state present. Accused Waqar Ahmad and Muhammad Shakir on bail present. Local commissioner Faozia Shah Advocate present and submitted commission report alongwith recorded statements of the female LRs of the deceased Murad Khan and Muhammad Riaz, POF.

- 2. As per record, the accused Waqar Ahmad and Muhammad Shakir sons of Sanober Khan have been charged in case FIR No.146 dated 10.04.2021 U/Ss 302/324/34 PPC of Police Station Lachi, Kohat.
- 3. Record transpires that on 10.06.2023 one of the LR of the deceased Murad Khan and Muhammad Riaz namely Mohsin Kamal S/O Muhammad Riaz appeared before the court, submitted an affidavit and proforma of compromise besides recorded his statement stating that he has affected compromise with the nominated accused Wagar Ahmad and Muhammad Shakir, by waving his rights of Qisas and Divat etc expressing his no objection over acquittal of the accused Wagar Ahmad and Muhammad Shakir from the charges leveled against them in the instant case. Similarly, on 06.06.2023, accused party moved an application for recoding of statements of

12 DEC 2023

EXAMINED COPINS BRANCH KOHAT

female LRs of the deceased though local commission. As such, Faozia Shah was appointed as Local commissioner by this court with the direction to visit the houses of the female LRs of the deceased Murad Khan and Muhammad Riaz, to record their statements in respect of compromise and to submit her report. Today, local commissioner Faozia Shah present and has submitted her report alongwith the recorded statements of female LRs of the deceased Murad Khan and Muhammad Riaz, namely Mst. Shagufta Mizaj, Mst. Rabia Riaz alias Basri Riaz, Mst. Faiza Riaz, Mst. Nadra Riaz and Mst. Badshan Bibi wherein they stated that they have affected compromise with the nominated accused Waqar Ahmad and Muhammad Shakir sons of Sanobar Khan, have pardoned them unconditionally in the name of Almighty Allah, by waving off their rights of Qisas and Diyat etc and have got no objection if this court acquit the nominated accused Wagar Ahmad and Muhammad Shakir from the charges against them in the instant case. They also confirmed that the compromise is without force, pressure and coercion. The said female LRs were identified by Muhammad Sadiq and Sanjab Khan. Statement of local commissioner also recorded today as CW-01. Commission report is Ex:PF, statements of LRs of deceased are Ex:PG to Ex:PK, while copies of CNICs of female LRs of Aftering of Trill Copy the deceased are Ex:PL to Ex:PP on case file.

12 DEL 2023

EXAMINED COPING BRANCH KOHAT

(25)

In view of the affidavit Ex:PA and Ex:PB, proformas of compromise Ex.PC and Ex.PD coupled with statements of LRs of the deceased regarding their compromise with the nominated accused Wagar Ahmad and Muhammad Shakir, their waiver of rights of Qisas and Diyat etc vis-à-vis their no objection over acquittal of the nominated accused from the charges level against them, the nominated accused Waqar Ahmad and Muhammad Shakir sons of Sanobar Khan are acquitted from the charges levelled against them. They are on bail; their sureties are discharged from the liability of bail bonds. Case property be kept intact till expiry of period of appeal/revision, where after, be dealt with in accordance with law. File be consigned to the Record Room after its necessary completion and compilation.

Announced 17.06.2023

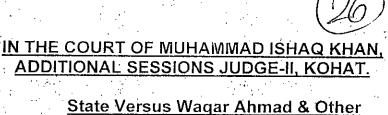
(Muhammad Ishaq Khap) Addl; Sessions Judge 11, Kohat

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ATTESTED TO BE VIUE DOPY

1 2 DEC 2023

EXAMINED COPING BRANCH KOHAT



ORDER-05 17.06.2023 State Versus Wagar Ahmad & Other Case No.118/SC

APP for the state present. Accused Waqar Ahmad and Muhammad Shakir on bail present. Local commissioner Faozia Shah Advocate present and submitted commission report alongwith recorded statements of the female LRs of the deceased Sikandar Khan, POF.

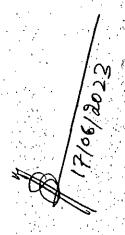
- 2. As per record, the accused Wagar Ahmad and Muhammad Shakir sons of Sanober Khan have been charged in case FIR No.414 dated 05.08.2019 U/Ss 302/324/427/337(d)/337F(I)/34 PPC of Police Station Lachi, Kohat.
 - Record transpires that on 06.06.3023 complainant Muhammad Shoaib S/O Doran Khan appeared before the court, submitted affidavit besides recorded his statement confirming his compromise with the nominated accused Wagar Ahmad and Muhammad Shakir in case FIR No.414 dated 05.08.2019 U/S 302/324/427/34 PPC PS Lachi, Kohat and his no objection over the acquittal of nominated accused from the charges leveled against them in the case in hand. On 10.06.2023 one of the LR of the deceased Sikandar Khan namely Mohsin Kamal S/O Muhammad Riaz appeared before the court, submitted an affidavit and proforma of compromise besides recorded his statement stating that he also has affected

17/06/2623

1 2 DEC 2023

EXAMINEU COPING BRANCH KOHAT

compromise with the nominated accused Wagar Ahmad and Muhammad Shakir, by waving his rights of Qisas and Diyat etc expressing his no objection over the acquittal of the accused Waqar Ahmad and Muhammad Shakir from the charges leveled against them in the instant case. He also affirmed that LRs Sikanadar deceased Khan namely Muhammad Riaz/father of deceased and Murad Khan/brother of deceased have already died being murdered regarding which case FIR No.146 has been registered. The said fact is also confirmed from the copy of FIR No.146 dated 10.04.2021 U/Ss 302/324/34 PPC PS Lachi, Kohat available on file. Similarly, on 06.06.2023, accused party moved application for recoding of statements of the female LRs of the deceased though local commission. As such, Faozia Shah was appointed as Local commissioner by this court with the direction to visit the houses of the female LRs of the deceased Sikandar Khan and to record their statements in respect of compromise and to submit her report. Today, local commissioner Faozia Shah present and has submitted her report alongwith recorded statements of female LRs of the deceased Sikandar Khan, namely Mst. Shagufta Bibi (mother of the deceased) Mst. Faiza Bibi, Mst. Nadra Riaz and Mst. Rabia Bibi (sisters of deceased) wherein they stated that





12 DEC 2023

EXAMINED COPING BRANCH KOHAT

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(28)

they have affected compromise with the nominated accused Wagar Ahmad and Muhammad Shakir sons of Sanobar Khan, have pardoned them unconditionally in the name of Almighty Allah, by waving off their rights of Qisas and Divat etc and have got no objection if this Hon'ble court acquit the nominated accused Wagar Ahmad and Muhammad Shakir from the charges against them in the instant case. They also confirmed that the compromise is without force, pressure and coercion. The said female LRs were identified by Muhammad Sadiq and Sanjab Khan. Statement of local commissioner also recorded as CW-01. Commission report is Ex:PE, statements of female LRs of deceased are Ex:PF to Ex:PI, while copies of CNICs of the said LRs are Ex:PJ to Ex:PM on case file.

In view of the affidavit Ex:PB, proforma of compromise Ex:PC coupled with statement of the remaining alive LRs of the deceased regarding their compromise with the nominated accused Waqar Ahmad and Muhammad Shakir, their waiver of rights of Qisas and Diyat etc vis-à-vis their no objection over the acquittal of nominated accused from the charges level against them, the nominated accused Waqar Ahmad and Muhammad Shakir sons of Sanobar Khan are acquitted from the charges levelled against them. They are on bail; their sureties are discharged from

2 7 106/2023

OTTESTED TO BE TRUE COPY

EXAMINED COMING PRANCH KOHAT

the liability of bail bonds. Case property be keptintact till expiry of period of appeal/revision,
where-after, be dealt with in accordance with
law. File be consigned to the Record Room
after its necessary completion and compilation.

Announced 17.06.2023

(Wuhammad Ishaq Khan)
Addl; Sessions Judge II
Kohat

Artesten to be invectory
12 DEC 2023

EXAMINED COPING BRANCH KOHAT

DHQ TEACHING HOSPITAL KOHAT

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GOVERNMENT OF KHYBER PAKHTUNKHWA .

DHQ TEACHING HOSPITAL KDA KOHAT

MEDICAL FITNESS CERTIFICATE

Certified that Mr. / Mrs. Waggy	S/D/O Sanoborlehu
resident of Dhody Show 10661	in the second se
having CNIC No. 143029928151-SDepartment &	ducation Design: Teacher has
been examined by me in this hospital on. $18-12-66$	

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Name of Doctor

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BEFORE HONORABLE KIIYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

WAKALATNAMA

Wagar Ahmad S o Sanobar Khan

VERSUS

(Applicant) (Appellant)

District Education Officer & Others

(Respondents) (Defendants)

I, Waqar Ahmad (Appellant) in the above noted Appeal, do hereby appoint and constitute, Muhammad Amin Khattak Luchi ASC & M. Yaseen HassanKhelvi Advocate High Court, to appear, plead, act, compromise withdraw or refer to arbitration to me/us as my/our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.

ACCEPTED

Muhammad Amin Khattak Lachi.

Advocate, Supreme Court of Pakistan.

M. Yaseen HassanKhelvi

Advocate High Court.

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