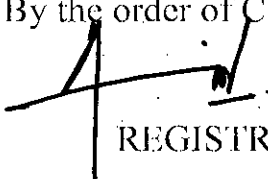


# FORM OF ORDER SHEET

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

**Appeal No.** \_\_\_\_\_ **04/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	01/01/2024	<p>The appeal of Mr. Muhammad Shakir 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 counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 04 /2023

Muhammad Shakir..... APPELLANT

VERSUS

District Education Officer, Kohat & others..... RESPONDENTS

**I N D E X**

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-3
2.	Affidavit		4
3.	Application for Condonation of Delay with Affidavit		5-6
4.	Addresses of the Parties		7
5.	Copy of Departmental Appeal		8
6.	Copy of Service Record		9-14
7.	Copy of NOC		15
8.	Copy of Appointment Order		16-18
9.	Copy of Charge Report		19
10.	Copy of Order dated 17.12.2019		20
11.	Copy of Corrigendum dated 28.01.2018		21
12.	Copy of Request for Guidance dated 01.08.2023		22-25
13.	Copy of Notification dated 02.11.2023		26-27
14.	Copy of Letter dated 05.12.2023		28
15.	Copy of Order dated 17.06.2023 of Additional Sessions Judge-II, Kohat		29-35
16.	Copies of Medical Prescriptions		36-38
17.	Wakalatnama		39

Through Appellant

  
**Muhammad Amin Khattak Lachi**  
Advocate Supreme Court

①

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

Service Appeal No. 04/2023

**Muhammad Shakir S/o Sanobar Khan R/o Lachi Payan District  
Kohat Ex GPS No 1 Lachi Payyan.**

**VERSUS**

1. District Education officer Kohat.
2. Director Elementary and Secondary Education KPK Peshawar.
3. Secretary of Elementary and Secondary Education KPK Peshawar.

**APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974,  
READ WITH RELEVANT RULES, AGAINST THE  
IMPUGNED ORDER ENDST. / NO.9586.92 DATED  
17/12/2019, WHEREBY RESPONDENT NO 1 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 17/12/2019 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 Police Constable BPS 05 on 13.03.2014 and later on promoted to BPS-7, and performed his duty honorably till 10.01.2018.

(2)

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 education department advertised some PST posts and the appellant applied for those posts through proper channel, obtaining a No Objection Certificate (NOC) from the police department. After passing the test and interview, the appellant took charge as a PST teacher on 02.01.2019.
5. **That** appellant and his father unluckily charged in a fabricated murder case F.I.R No. 414/19 on August 5<sup>th</sup> 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 17-12-2019, 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 17/12/2019 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

#### **GROUND.**

1. **That** impugned order dated 17/12/2019, ENDST. No. 9586.92 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 will 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.
4. **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 show cause notice and by other legal formalities.
6. **That** mere absentia 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 adduced during the course of arguments.

**On acceptance of this appeal, the impugned order dated 17/12/2019, may be set aside and appellant may kindly be reinstate in service along with back benefits.**

Appellant

Through

**Muhammad Amin Khattak Lachi**  
**Advocate Supreme Court**

*& Q. al-est*  
**Muhammad Yasen Hassan Khelvi**  
**Advocate High Court.**

4

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

Service Appeal No. \_\_\_\_\_ /2023

Muhammad Shakir S/o Sanobar Khan

**VERSUS**

District Education Officer Kohat & others.

**AFFIDAVIT**

I, Muhammad Shakir 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.



**DEPONENT**

(5)

**BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service appeal No: \_\_\_\_\_/2023

**Muhammad Shakir S/o Sanobar Khan R/o Lachi Payyan  
District Kohat.**

\_\_\_\_\_ **Appellant.**

**VERSUS**

- i. District Education officer Kohat.
- ii. Director Elementary and Secondary Education KPK  
Peshawar.
- iii. Secretary of Elementary and Secondary Education KPK  
Peshawar.

\_\_\_\_\_ **Respondents.**

**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 far.
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.

6

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 fit and proper in the facts and circumstances of the case may kindly be passed.

Through

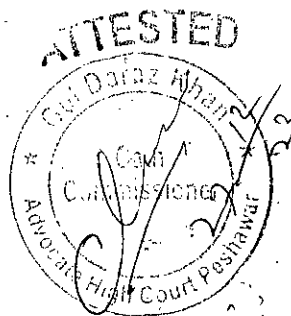
Applicant

Muhammad Amin Khattak Lachi  
Advocate Supreme Court.

& *M. Y. Hassan*  
Muhammad Yasen Hassan Khelvi  
Advocate High Court.

AFFIDAVIT.

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



*S. Khan*  
DEPONENT



7

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

Service Appeal No. \_\_\_\_\_/2023

Muhammad Shakir S/o Sanobar Khan,

**VERSUS**

The District Education Officer & others.

**Appellant:**

Muhammad Shakir 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. The Secretary Elementary & Secondary Education, Khyber  
Pakhtunkhwa, Peshawar.

**Through:**

**Appellant**

**Muhammad Amin Khattak Lachi**

Advocate, Supreme Court.

**Muhammad Yaseen Hassan Khelvi**

Advocates, High Courts.

بخدمت جناب ڈائریکٹر صاحب ایلمنٹری ایجوکیشن خیرپہنٹو

عنوان: اپیل برائے بحالی سروس

جناب عالی!

سائل ذیل مرض رساں ہے

- 01: یہ کہ سائل مورخہ: 13/08/2014 کو غلط پولیس میں سپاہی بھرتی ہو کر 10/01/2018 تک احسن طریقے سے ڈیوٹی سرانجام دی (نقل ایپلمنٹ آرڈر لف ہے)۔
- 02: یہ کہ محکمہ تعلیم نے خالی اسامیوں (PST) کی شہری کی تو سائل نے ننگا پولیس سے NOC لیا مگر پھر پراپر جینٹل اپیلی برائے PST کیا۔ (NOC لف ہے)
- 03: یہ کہ سائل نے محکمہ تعلیم میں تمام ٹیسٹ ایئر دیو پاس کر کے مورخہ: 31/12/2018 کو پرائمری سکول میچر کے بحیثیت سے بھرتی ہوا۔ (نقل آرڈر لف ہے)۔
- 04: یہ کہ سائل نے مورخہ 2/01/2019 میں بحیثیت PST میچر گورنمنٹ پرائمری سکول لاجی پایاں نمبر 01 میں اپنے جہدہ باقاعدہ پارچ سنبھال کر کے کام شروع کر دیا۔ (نقل پارچ رپورٹ لف ہے)۔
- 05: یہ کہ سائل اپنی ڈیوٹی محکمہ تعلیم میں احسن طریقے سے سرانجام دے رہا تھا لیکن بد قسمتی سے سائل کو مورخہ: 05/08/2019 کو ایک جھوٹے ایف آئی آر تھانہ لاجی ضلع کوہاٹ میں ملوث کیا گیا اور مورخہ: 07/09/2019 کو سائل کے بھائی کو 15 پولیس سٹیشن کوہاٹ کے سامنے بے دردی سے قتل کیا گیا جس کی وجہ سے سائل انتہائی ذہنی اذیت اور خوف میں مبتلا ہو کر اپنی ڈیوٹی اور کسی بھی پولیس سٹیشن کو سامنا آیا۔
- 06: یہ کہ سائل کے خلاف محکمہ ایجوکیشن ضلع کوہاٹ کے ڈسٹرکٹ ایجوکیشن آفیسر نے بڑی نجات میں برطرفی کا حکم صادر کیا ہے (نقل لف ہے)
- اندریں حالات مذکورہ بالا یوں ہے کہ سائل کو بخاذا عدالت نے مورخہ: 23-06-17 کو بے گناہ قرار کر کے بری کر دیا ہے (مندرجہ ذیل عدالت لف ہے)
- لہذا استدعا ہے کہ سائل کا اپیل ہذا منظور فرمایا جا کر Fundamental حقوق کے تحت فیصلہ فرمایا جا کر برطرفی کا حکم منسوخ فرمایا جائے اور سائل کو واپس اپنی پوسٹ پر بحال کیا جائے سائل دعا گور رہے گا۔

العارض

محمد شاکر ولد منور خان سابقہ PST گورنمنٹ پرائمری سکول نمبر 01 لاجی پایاں کوہاٹ

5/7/2023

14301-292450-1

ATTESTED

OFFICE OF THE SUPERINTENDENT OF POLICE,  
FRP KOHAT RANGE, KOHAT  
PH: 092-922-0260124, FAX: 0922-9260134

9

No. 453 /SRC, dated Kohat the 08/03 /2019

To: The District Education Officer, (Male)  
Kohat

Subject: SERVICE RECORD  
Memo:

Please refer to your office order Endst: No. 10703-11022/Apptt: PST/17-18 dated 31.12.2018 on the case noted above in the subject.

The service record of Constable Muhammad Shakir No. 5628 of this Range who was appointed against a post of Primary School Teacher (BPS-12) in Education Department Kohat vide order Endst: No. quoted above, is sent herewith for your office record which may please be acknowledged.

Encls:  
S/Roll - 1  
F. Missal - 1

*[Signature]*  
Superintendent Of Police, FRP  
Kohat Range, Kohat

*D.A.  
Put up on file to  
SDED Kohat  
20-4-19*

NAME _____
ADDRESS _____
SUBJECT _____
FROM _____ TO _____

*[Signature]*  
ATTESTED

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Appointment, promoted, suspended, reduced, discharged, dismissed, resigned or died.	To what grade and pay appointed, promoted or reduced.	Date	No. of District Order	Full Signature of Superintendent of Police
				(10)
	<p>6985/pm</p> <p>Pl as Const @ Rs 6985/pm w.e. 1-7-2015</p> <p>Pl as Const @ Rs 7385/pm w.e. 1-12-2015.</p> <p>SVC 12</p> <p>13-14 To 3274</p> <p>has been verified for pay bill.</p> <p>Pls have in his file</p> <p>DISTRICT POLICE OFFICER KOHAT</p>			<p>District Police Officer Kohat</p> <p>26/6</p> <p>Pay fixed pro... revised</p> <p>BPS-518590-421-21190. 90/0/02</p> <p>W-d 01/07/2016</p> <p>Pl as FC @ 9430/pm 1/1/17</p> <p>Pay Fixed in the Revised Basic Pay Scale</p> <p>4985340/17185 5</p> <p>R.O. 10/07/2015</p>

District  
 Father  
 Resident  
 Date  
 Excess  
 etc

7. TRANSFERS BEYOND THE DISTRICT

Date	From	To	Pay Fixed @ Rs.
	2017		
	<p>Pay fixed provisionally in the revised</p> <p>BPS-510260-50-25260 @ Rs 11260/pm</p> <p>W-d 1-1-7-2017</p> <p>Pl as FC @ Rs 11760/pm w.e. 1/1/17</p> <p>4 and SRC FRP Kohat</p>	<p>10260 500 25260 5</p> <p>11260</p> <p>Authority for transfer</p> <p>05/01/18</p>	

ATTESTED

80-71	AVP
87-51	AVP
88-52	AVP
90-51	AVP
90-52	AVP

8. NAMES OF RELATIVES IN GOVERNMENT SERVICE.		
2	3	4
Relationship	Nature of employ.	District
		(11)

9. NAME, RESIDENCE AND OTHER PARTICULARS OF HEIRS:

UPGRADATION FROM BPS-05 TO BPS-07

Wife: Appointed from BPS-05 to BPS-07 vide Finance Department KP Restriction Notification No (50) (FR) LFD 7-8/2015-1/LPO 3345 Dated 03-1-2018 and PP's KP Restriction order. (Vidst) No. 691/75/A-3 Dated 09-1-2018. Pay - 12210

Mother: Superintendent of Police, FBP Kohat Range, Kohat

Brother: Draft a sum of Rs. 2288 on a/c of UPA restriction with view of pay & allowances w.e.f. 2/1/18 to 30/4/18

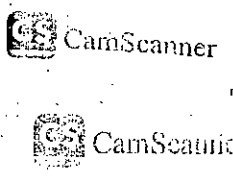
Sister: ~~not known.~~

*[Signature]*  
 District Comptroller of Accounts  
 KOHAT

As const @ Rs. 12820/PM-W-C-E 1-12-2018

Note: - Under line in red ink their nominated (with not more than two alternatives) and fill in name and particulars necessary to trace.

*[Signature]*  
**ATTESTED**



12. Miscellaneous particulars.

W. No. / S. No. / Res. No. / P. No. / ...

enter designation of award and date only - Gazette Notification in case of Quaid-i-Azam Police Medal and the Pakistan Police Medal. Other special decoration to be entered full under commendatory entries.

11/14

Drawn a sum of Rs. \_\_\_\_\_ on acc of \_\_\_\_\_  
\_\_\_\_\_ diff/ arrear of pay & \_\_\_\_\_  
Allowances w.e.f. \_\_\_\_\_ to \_\_\_\_\_  
due to non drawn.

12

DCA / DAO, Kohat

13. Miscellaneous particulars including awards other than those accompanied by Commendation Certificates, admission to removal from promotion lists.

Passed Recruit course 2015.

Passed R/Course term ending 20-3-15  
vide Comdt. P/C Hqs letter no 1914-25/s  
dated 17-9-15.  
OB No. 730  
Dated 3-10-15.

Superintendent of Police,  
S.P. Kohat Range,  
Kohat

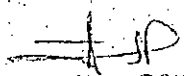
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13

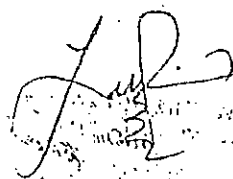
Transferred to FRP K.P.K vide AICR Esth  
Order and no 8731-34 Dated 19/11/17  
with immediate effect.

  
District Police Officer  
Kohat

Basic Computer Course

Successfully completed Basic  
Computer course held at Police  
School of Information and  
Technology from 14-08-2017 to  
25-08-2017 vide This office

OB No 96  
22-01-2018



  
ATTESTED

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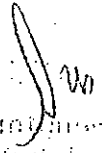
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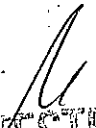
14

ORDER

Constable Muhammad Shakir No 5628 of FRP Kohat Range who had applied for education department Primary School teacher (BPS-12) through proper channel, after qualifying the requisite test/interviews conducted by NTS has got appointed on the said post vide district education officer (Male) Kohat order Endest No 16703-11022/APTI PST/17-18 dated 31-12-2018.

on his compliance with the prescribe policy and fulfilling all local formalities, he is hereby relieved of duty from this department w.e.f 10-01-2019 with immediate effect vide this office OB No 62 dated 18-01-2019.

  
Secretary, District Police  
Kohat

  
ATTACHED





15

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar

No: 1098 /E-IV, dated Peshawar the 31-8-18 /2018

To: The Commandant, FRP  
Khyber Pakhtunkhwa,  
Peshawar.

Subject: APPLICATION.

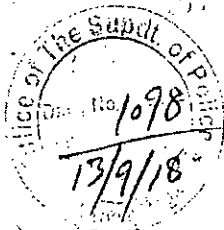
1548  
31-8-18

Memo. Please refer to your Memo No. 8561/EC dated: 16.08.2018 on the subject noted above.

Constable Muhammad Shakir No. 5628 of FRP Kohat Range is allowed to apply for the post of PST in Education Department, subject to submission of written statement on stamp paper that in case of his selection in other department he will deposit all the amount incurred on his training.

Moreover, his lien will not be retained in Police Department.

*(Signature)*  
((ZAIB ULLAH KHAN) PSp  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.  
29.08.2018



*Handwritten notes:*  
1098  
31/8/18  
10

*Handwritten:* SRC/OTC

*(Signature)*  
Superintendent of Police,  
FRP Kohat Range,  
Kohat  
13/9

ATTACHED



16

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



**APPOINTMENT ORDER**

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the post of Primary School Teacher (PST) School based in BPS-12 (Rs.13320-960-42120) @ Rs. 13,320/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre against the vacant posts noted against each on the terms and condition given below with effect from the date of their taking over charge:-

S#	Name	Father Name	UC	Name of School where posted	Score	Remarks
1	Muhammad Munir	Jan Gul	Bahader Kot	GPS Ahmed Nagar	128.05	AVP
2	Zain Ul Abideen Haider	Inayat Ur Rehman	Bahader Kot	GPS Shiekhan	127.59	AVP
3	Muhammad Kashif	Hameed Khan	Bahader Kot	GPS Kahi Bazid Khal	122.24	AVP
4	Saifullah Niazi	Mehmood Ahmad	Bahader Kot	GPS Ahmad Nagar	122.15	AVP
5	Salman Khan	Sultan Muhammad	Bahader Kot	GPS Bazid Khel	120.67	AVP
6	Waqar Shah	Azam Shah	Bahader Kot	GPS Shiekhan	119.98	AVP
7	Inam Ullah Khan	Zafur Ullah Khan	Bahader Kot	GPS Dagar Banda	119.89	AVP
8	Wahid Zaman	Shad Muhammad	Bahader Kot	GPS Bazid Khel	117.66	AVP
9	Afaq Anwar Habib	Habib Noor	Bahader Kot	GPS Ahmed Nagar	115.62	AVP
10	Aurangzeb	Ilyas Muhammad Khan	Bahader Kot	GPS Bazid Khel	115.53	AVP
11	Muhammad Sufyan	Muhammad Rizwan	Bahader Kot	GPS Hakim Abad	112.6	AVP
12	Adnan Irshad	Irshad Muhammad	Bahader Kot	GPS Ahmed Nagar	111.31	AVP
13	Zia Ur Rehman	Tahir Mehmood	Bahader Kot	GPS Bazid Khel	110.34	AVP
14	Amanullah	Mehmood Ahmed	Bahader Kot	GPS Bazid Khel	108.67	AVP
15	Faraz Muhammad	Rasam Ali Khan	Bahader Kot	GPS Bazid Khel	108.1	AVP
16	Yasir Rehman	Abdur Rehman	Bahader Kot	GPS Bazid Khel	107.41	AVP
17	Ajbar Khan	Ali Asghar	Billitang	GPS Dhok Sharif	125.39	AVP
18	Abrash Rehman	Masood Ur Rehman	Billitang	GPS Marchungi	116.86	AVP
19	Taj Ud Din	Idrees Afridi	Billitang	GPS Dhok Sharif	114.95	AVP
20	Izhar Ullah Khan	Sana Ullah Khan	Billitang	GPS Khalifa Abad	112.75	AVP
21	Wajid Ali Shah	Gul Moeen Shah	Billitang	GPS Siab	109.44	AVP
22	Nadeem Shehzad	Muhammad Hayat Khan	Billitang	GPS Koteri	107.22	AVP
23	Aamir Mehmood	Abdul Mehmood	Billitang	GPS Gandialy Bala	105.77	AVP
24	Shams Ur Rehman	Abdur Rehman	Billitang	GPS Marchungi	105.48	AVP
25	Aurangzeb	Adam Khan	Billitang	GPS Koteri	103.46	AVP
26	Muhammad Fareed Khan	Hazrat Mir	Billitang	GPS Kohati Dhok	103.33	AVP
27	Muhammad Shahzad	Muhammad Zubair	Billitang	GPS Khalifa Abad	102.8	AVP
28	Imran Khan	Akbar Khan	Billitang	GPS Nari Kuk	102.22	AVP
29	Kamran Mehmood	Sultan Mehmood	Billitang	GPS Siab	101.93	AVP

16

AVP

17

S#	Name	Father Name	UC	Name of School where posted	Score	Remarks
283	Sajid Shamshad	Rajeeb Gul	Urban-VI	GPS Afridi Banda	114.27	AVP
284	Muhammad Jawad	Muhammad Ishaq	Urban-VI	GPS No.2 Baqi Zai	112.89	AVP
285	Muhammad Aqib	Faqeer Muhammad	Urban-VI	GPS No. 4 Baqi Zai	106.11	AVP
286	Asif Khan	Khushdil Khan	Urban-VI	GPS Tappi	105.95	AVP
287	Amjad Islam	Abdus Salam	Urban-VI	GPS No.4 Baqi Zai	104.54	AVP
288	Muhammad Irfan	Silawar Khan	Urban-VI	GPS Afridi Banda	104.16	AVP
289	Inam Ul Haq	Ihsan Ul Haq	Urban-VI	GPS No.2 Baqi Zai	101.69	AVP
290	Sayed Mubbashir Hussain	Sayed Amin Hussain	Usterzai	GPS Esa Khel	128.64	AVP
291	Waqas Ali	Kazim Ali	Usterzai	GPS Esa Khel	123.74	AVP
292	Habib Ur Rehman	Noor Zaman	Z.S.Allah Dad	GPS Dhok Ghulam Farooq	110.61	AVP
293	Irfan Shah	Taimur Shah	Z.S.Allah Dad	GPS Darsha Khel	102.62	AVP
294	Ateeq Ur Rehman	Abd Ur Rehman	Z.S.Allah Dad	GPS No.1 Shadi Pur	101.75	AVP
295	Imtiaz Khan	Kabal Khun	Z.S.Allah Dad	GPS Darsha Khel	101.36	AVP
296	Saif Ullah Shah	Sattar Shah	Z.S.Allah Dad	GPS Dhok Suhbat Khan	98.06	AVP
297	Zafran Ullah	Walibuz Khan	Z.S.Allah Dad	GPS Sahib Gul	97.42	AVP
298	Mujeeb Ur Rehman Shah	Taimur Shah	Z.S.Allah Dad	GPS Khwaja Khel	97.12	AVP
299	Mirazam Khan	Izat Khan	Z.S.Allah Dad	GPS Darsha Khel	94.39	AVP
300	Saqib Wali	Wali Khan	Z.S.Allah Dad	GPS Dhok Said Badshah	93.52	AVP
301	Zuhid Ullah	Gulab Shah	Z.S.Allah Dad	GPS Khwaja Khel	91.2	AVP
302	Samee Ullah	Salceem Khan	Z.S.Allah Dad	GPS Mandooni	89.38	AVP
303	Rahmat Ali	Lajber Khan	Z.S.Allah Dad	GPS Khwaja Pail	87.83	AVP
304	Gohar Rehman	Tahir Shah	Z.S.Allah Dad	GPS Khwaja Pail	87.5	AVP
305	Syed Ghous Ali Shah	Taj Akbar	Z.S.Allah Dad	GPS No.1 ZSA Dad	86.32	AVP
<b>02 % Disable Quota</b>						
1	Tanveer Iqbal	Muhammad Iqbal	Togh Bala-I	GPS No.1 Togh Bala	107.29	AVP
2	Mansoor Ahmad	Maqsood Ahmad	Urban-V	GPS Mir Ahmed Khel	101.42	AVP
3	Abdullah	Din Bad Shah	Urban-VI	GPS No.4 Baqi Zai	94.51	AVP
4	Tariq Hussain	Hassan Akbar	Kharmatoo	GPS Kharmatoo	88.62	AVP
5	Faheem Abbas	Mukaram Khan	Usterzai	GPS No.1 Usterzai Payan	86.24	AVP
6	Namroz Khan	Member Khan	Sudal	GPS Sudal	84.3	AVP
7	Muzaffar Ali	Roshan Ali	Usterzai	GPS Musa Khel Kachai	83.57	AVP
<b>03 % Minority Quota</b>						
1	Saqib Younas	Younas Masih	Urban-I	GPS PAF Base	98.31	AVP
2	Amman Bhatti	Riaz Bhatti	Urban-I	GPS Tehsil Gate	87.86	AVP
3	Sunny	Mushtaq Masih	Urban-I	GPS Sangairh	68.8	AVP

**Terms & Conditions**

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on Adhoc/ Contract/ School Based initially for one year.
4. They should not be handed over charge if he exceeds 35 years or below 18 years of

RECEIVED

Slr	Name	Father Name	UC	Name of School where posted	Score	Order
103	Khadim Hussain	Ghulam Hussain	Khushal Garh	GPS Dhok Raza Khan	90.0	AVP
104	Hafiz Mohammad	Imam Shah	Khushal Garh	GPS Gul Hassan Banda	90.5	AVP
105	Zahid Iqbal	Khush Dil Khan	Khushal Garh	GPS Banda Karim Khan	88.5	AVP
106	Muhammad Nasir	Muhammad Shoaib	Khushal Garh	GPS Gul Hassan Banda	87.5	AVP
107	Fida Hussain	Banaras Khan	Khushal Garh	GPS Ahwara	86.7	AVP
108	Muhammad Tufail Ghafari	Muhammad Hafiz	Khushal Garh	GPS Dhok Sher Zaman	86.5	AVP
109	Said Kamal	Masruq Gul	Khushal Garh	GPS Pershai	83.95	AVP
110	Imam Ali	Farooq Khan	Khushal Garh	GPS Dhok Ahin Aslam	82.36	AVP
111	Amir Ali	Abdul Wahid	Khushal Garh	GPS Banda Karim Khan	78.7	AVP
112	Amir Ali	Amir Ali	Khushal Garh	GPS Gario Pan	78.67	AVP
113	Muhammad Aslam	Raza Gul	Kausial Garh	GPS Dhok Lal Bidsah	75.5	AVP
114	Amir Ali	Dera Gul	Khushal Garh	GPS Kamar	75.28	AVP
115	Muhammad Aslam	Muhammad Aslam	Khushal Garh	GPS Gul Hassan Banda	74.67	AVP
116	Muhammad Aslam	Muhammad Aslam	Lachi Rural	GPS No. 1 Lachi Pawan	72.64	AVP
117	Muhammad Aslam	Khalid Nur Khan	Lachi Rural	GPS No. 2 Lachi Pawan	72.67	AVP
118	Muhammad Aslam	Amir Ali Khan	Lachi Rural	GPS No. 3 Lachi Pawan	72.67	AVP
119	Muhammad Aslam	Yousaf Shah	Lachi Rural	GPS No. 4 Lachi Pawan	72.50	AVP
120	Khalid Zaman	Farooq Khan	Lachi Rural	GPS Hassan Lachi	72.50	AVP
121	Asif Rehman	Gul Rehman	Lachi Rural	GPS Shahi Banda	70.59	AVP
122	Nasim Gul	Amir Ali Gul	Lachi Rural	GPS No. 5 Lachi Pawan	70.25	AVP
123	S. Y. S. S. S.	S. A. S. S. S.	Lachi Urban	GPS No. 1 Lachi Pawan	70.52	AVP
124	Muhammad Aslam	Muhammad Aslam	Lachi Urban	GPS No. 2 Lachi Pawan	70.58	AVP
125	Muhammad Aslam	Ajmal Khan	Lachi Urban	GPS No. 3 Lachi Pawan	70.57	AVP
126	Talal Ahmad	Dost Muhammad	Lachi Urban	GPS No. 4 Lachi Pawan	70.58	AVP
127	Muhammad Aslam	Said Khan	Lachi Urban	GPS No. 5 Lachi Pawan	70.58	AVP
128	Sharif Ullah Khan	Ishfaq Ahmad	Lachi Urban	GPS No. 1 Lachi Pawan	71.92	AVP
129	Nazir Muhammad	Sher Muhammad	Mandoori	GPS Sheehanto Banda	71.45	AVP
130	Shamir Ur Rehman	Abdul Qadoos	Mandoori	GPS Kheder Khel	71.91	AVP
131	Nasim Shah	Momen Shah	Mandoori	GPS Lizar Wala	71.90	AVP
132	Muhammad Aslam Khan	Muhammad Aslam Khan	Mandoori	GPS Fazal Abad	71.89	AVP
133	Muhammad Aslam	Amir Khan	Mandoori	GPS Gulshah Khel	71.88	AVP
134	Muhammad Aslam	Rajinder Khan	Mandoori	GPS No. 1 Mandoori	70.64	AVP
135	Abdul Wahid	Muhammad Khalid Khan	Mandoori	GPS No. 2 Mandoori	70.53	AVP
136	Muhammad Aslam	Muhammad Aslam Khan	Mandoori	GPS No. 3 Mandoori	70.53	AVP
137	Muhammad Aslam	Muhammad Aslam Khan	Mandoori	GPS No. 4 Mandoori	70.53	AVP
138	Muhammad Aslam	Muhammad Aslam Khan	Mandoori	GPS No. 5 Mandoori	70.53	AVP
139	Muhammad Aslam	Muhammad Aslam Khan	Mandoori	GPS No. 6 Mandoori	70.53	AVP
140	Muhammad Aslam	Muhammad Aslam Khan	Mandoori	GPS No. 7 Mandoori	70.53	AVP

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ATTESTED

S#	Name	Father Name	UC	Name of School where posted	Score	Remarks
103	Khadim Hussain	Ghulam Hussain	Khushal Garh	GPS Dhok Raza Khan	90.9	AVP
104	Hafiz Mohammad	Imam Shah	Khushal Garh	GPS Gul Hassan Banda	90.51	AVP
105	Zahid Iqbal	Khush Dil Khan	Khushal Garh	GPS Banda Karim Khan	88.52	AVP
106	Muhammad Nasir	Muhammad Shoaib	Khushal Garh	GPS Gul Hassan Banda	87.51	AVP
107	Fida Hussain	Banaras Khan	Khushal Garh	GPS Alwara	86.74	AVP
108	Muhammad Tufail Chishti	Muhammad Hafeez	Khushal Garh	GPS Dhok Sher Zaman	86.52	AVP
109	Said Kamal	Meraj Gul	Khushal Garh	GPS Pershai	83.98	AVP
110	Asad Khan	Farid Khan	Khushal Garh	GPS Dhok Mir Aslam	82.36	AVP
111	Zainulabideen	Abdul Salam	Khushal Garh	GPS Banda Karim Khan	78.74	AVP
112	Nadir Ali Khan	Ajab Khan	Khushal Garh	GPS Gajio Par	78.67	AVP
113	Muhammad Momin	Nazir Gul	Khushal Garh	GPS Dhok Lal Badshah	75.56	AVP
114	Shabir Ahmad	Derar Gul	Khushal Garh	GPS kamar	75.28	AVP
115	Bashir Ahmad	Muhammad Farooq	Khushal Garh	GPS Gul Hassan Banda	74.67	AVP
116	Shahid Ali Shah	Syed Yousaf Shah	Lachi Rural	GPS Walai	127.64	AVP
117	Iqbal Nadeem	Rab Nawaz Khan	Lachi Rural	GPS Terawal Banda	123.74	AVP
118	Muhammad Naib Khan	Aman Ullah Khan	Lachi Rural	GPS Dogmalak	123.47	AVP
119	Mamoor Ali Shah	Yousaf Shah	Lachi Rural	GPS Banda Fateh Khan	108.59	AVP
120	Khan Zaman	Faqir Hussain	Lachi Rural	GPS Hassan Banda	107.99	AVP
121	Asif Rehman	Gul Rehman	Lachi Rural	GPS Shahr Banda	106.53	AVP
122	Nasim Gul	Amroono Gul	Lachi Rural	GPS Hoa	105.23	AVP
123	Sabir Sultan	Sultan Badshah	Lachi Urban	GPS Nori Lachi Payan	126.52	AVP
124	Muhammad Saif Ullah	Nazir Badshah	Lachi Urban	GPS No.1 Lachi Payan	124.58	AVP
125	Arsalan Javaid	Ajmal Khan	Lachi Urban	GPS No.3 Lachi Payan	124.57	AVP
126	Talal Ahmad	Dost Muhammad	Lachi Urban	GPS No.3 Lachi Bala	123.88	AVP
127	Muhammad Shakir	Sanober Khan	Lachi Urban	GPS No.1 Lachi Payan	120	AVP
128	Sharafat Ullah Khan	Ishfaq Ahmad	Lachi Urban	GPS No.1 Lachi Payan	11.82	AVP
129	Nazir Muhammad	Sher Muhammad	Mandoori	GPS Shiekhano Banda	118.43	AVP
130	Shams Ur Rehman	Abdul Qadoos	Mandoori	GPS Khader Khel	116.9	AVP
131	Numan Shah	Momen Shah	Mandoori	GPS Inzar Wala	113.96	AVP
132	Muhammad Asim Khan	Muhammad Hayat Khan	Mandoori	GPS Fazal Abad	113.49	AVP
133	Hilal Khan	Amir Khan	Mandoori	GPS Gulshah Khel	111.48	AVP
134	Nisar Hameed Khan	Rajmali Khan	Mandoori	GPS No.1 Mandoori	109.64	AVP
135	Abid Ali Shah	Muhammad Kaleem Shah	Mandoori	GPS No.2 Mandoori	108.63	AVP
136	Shahid Bilal	Shoukat Ullah Khan	Mandoori	GPS Fazal Abad	108.54	AVP
137	Noor Ullah	Masood Alam	Muhammad Zai	GPS Muhammad Zai	119.83	AVP
138	Muhammad Yousaf	Muhammad Khurshid	Muhammad Zai	GPS Muhammad Zai	112.57	AVP

11/11/2016

19

جارج رپورٹ

(بنا محمد شاہ 12 EPS PST)

ENDST No 10703 - 11022 / APPET PST / 17-18

محکم ڈی۔ اے۔ او (کوہٹ) مورخہ 31/12/18 مطابق آرڈر نمبر آئی  
تفریحی کھیت پ۔ ایس۔ ٹی (بی۔ 12) میں گورنمنٹ پرائمری سکول  
لہذا چھاننا مارنر ① میں سوچنا ہے

آج مورخہ 2/19 (میل آرڈر نمبر) میں نے کھیت PST 3  
اپنے عہدے کا مامانہ جارج سمیٹ کر کام شروع کر دیا ہے۔

اعلیٰ رپورٹ ڈیپٹی سڈیو سڈیو آرڈر ارسال ہوئی ہے

دستخط جارج دھندہ

Head Master  
Govt Primary  
Lachi Payan

دستخط جارج گریڈ

ANIC - 14301-2921552-1

ATTESTED



(11)

20

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT  
ORDER

No. F.No.1/Show Cause/Complaint/Class-iv/Vol-II WHEREAS (1) Mr. Muhammad Shahir PST GPS No.1 Lachi Bala Kohat was proceeded under rules 9 of Khyber Pakhtunkhwa Government servants (Efficiency & Discipline) Rules, 2011 for the charges of wilful absence from School duty.

(1). AND WHEREAS, He was served absence notice on his home address, dated 02/09/2019, 07-09-2019 and 19-09-2019, for resumption of his duty in accordance with Rules 09 on the Rules ibid.

(2). AND WHEREAS, the accused PST failed to resume his duty accordingly.

(3). AND WHEREAS, show cause notice was issued vide this office No.8287 dated 15/10/2019, for personal hearing, but he failed.

4). AND WHEREAS, He was served absence notice through two leading news paper dated 23/11/2019 for resumption of his duty in accordance with Rules 09 on the Rules ibid. but he failed.

(5). AND WHEREAS, the competent authority District Education Officer (M) Kohat after having considered the charges and evidence on record, is of the view that the charge of wilful absence from official duty have been proved.

(6) AND WHEREAS, Final absence notice published in two leading newspaper but he again failed to attend this office in stipulated period.

(7). NOW THEREFORE, In exercise of powers conferred under Rule 4 (b) (iii) of, Government of Khyber Pakhtunkhwa (Efficiency and Discipline) Rules 2011, the competent authority (District Education Officer (M) Kohat) is pleased to impose major penalty of "REMOVAL FROM SERVICE" upon Mr. Mr. Muhammad Shahir PST GPS No.1 Lachi Bala Kohat wef. 02-09-2019.

DISTRICT EDUCATION OFFICER

Endst No. 9586.97 /F.No. Complaint/Class-iv(M) dated 17/11/2019

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

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohat
3. District Accounts Officer Kohat
4. Sub Divisional Education Officer (Male) Lachi
5. EMIS Branch Local Office
5. Mr. Muhammad Shahir PST GPS No.1 Lachi Bala Kohat
6. Master File

DISTRICT EDUCATION OFFICER  
(MALE) KOHAT

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

CORRIGENDUM

Impartial modification vide this office order No.9586-92 dated 17-12-2019, please read Muhammad Shakir PST GPS No.1 Lachi Payan instead of Muhammad Shahir PST GPS No.1 Lachi Bala Kohat regarding major penalty of "REMOVAL FROM SERVICE" for the charges of wilful absence from School duty.

*eok*  
DISTRICT EDUCATION OFFICER  
(MALE) KOHAT

Endst.No. 398-404 dated 28/01 /2019

Copy of the above is forwarded for information and n/a to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar;
2. Deputy Commissioner Kohat
3. District Accounts Officer Kohat
4. SDEO (M) Lachi.
5. EMIS Branch Local Office.
6. Muhammad Shakir PST GPS No.1 Lachi Payan Kohat.
7. Master File

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(MALE) KOHAT

*[Signature]*  
WITNESSED





DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.

No. \_\_\_\_\_ /F.No. 366/Appals/M/Dir Lower/Emab/HA 1  
Dated Peshawar the 01/06/2023

22

The Secretary (Primary)  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar.

**REQUEST FOR GUIDANCE**

I am directed to refer to the subject cited above and to state that Mr. Muhammad Shkir Ex-PST at GPS No.1 Lachi Bala District Kohat was serving as primary teacher in GPS No.11 in Elementary & Secondary Education Department in District Kohat.

That, the said Muhammad Shkir Ex-PST at GPS No.1 Lachi Bala District Kohat has filed an appeal before the Worthy Director Dated: 05-07-2023 (Annexure-A) seeking for his reinstatement in Service against the mentioned post in District Kohat in view of the Judgment dated 17-06-2023 of the Additional District & Sessions Judge-II, Kohat (Annexure-B) rendered in appeal No. 414/SC under case Titled Waqar Ahmad & other Vs State whereby, the appellant has been acquitted of charges levelled against the accused teacher in FIR No. 614 Dated: 05-08-2019 at PS Lachi District Kohat under Sections 302/324/427/34 PPC (Annexure-C) Passed by the Additional District & Sessions Judge-II, Kohat with the Order that "In view of the affidavit Ex-PA & Ex-PD proformas of compromise Ex:PC and Ex:PD coupled with the statements of LRs of the deceased regarding their compromise with nominated accused Muhammad Shkir & Waqar Ahmad, their walver of rights of Qisas and Diyat etc. vis-à-vis their no objection over acquittal of the nominated accused from the charges levelled against them, the nominated accused Muhammad Shkir & Waqar Ahmad are acquitted from the charges levelled against them attached as (Annexure-D)".

That, District Education Officer (Male) Kohat proceeded Muhammad Shkir Ex-PST at GPS No.1 Lachi Bala District Kohat under Rules-9 of the Khyber Pakhtunkhwa Government Servants (Recruitment & Discipline) Rules-2011, on account of wilful absence from official duties being a regular employee, imposed major penalty of "Removal from Service" upon him vide Notification Encls. No. 9586/21 dated 17-12-2019 attached as (Annexure-E).

Therefore, in view of the above made facts of the case under reference, it is requested that the Law Department, may kindly be approached for the grant of legal advice and opinion to the extent of Re-instatement in Service of the appellant as PST in GPS-12 in view of the Departmental Action taken by the then DEO under Rule-9 in shape of the Removal from Service vide Order Dated:17-12-2019 instead of invoking the provision of Rules-05 of the E&D Rules, 2011 or otherwise so as to proceed further into the matter under the Rules in vogue please.

Cop. forwarded to the:-

1. The District Education Officer (Male) Kohat.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab-1)  
Directorate EB Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

ATTESTED

Assistant Director (Estab-1)  
Directorate EB Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

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

No. \_\_\_\_\_/F.No.366/Appeals/M/Dir Lower/Estab(M-1)  
Dated Peshawar the 01/08/2023

To

The Section Officer (Primary)  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar.

Subject: **REQUEST FOR GUIDANCE**

Memo:

I am directed to refer to the subject cited above and to state that the applicant namely Muhammad Shakir Ex-PST at GPS No.1 Lachi Bala District Kohat was serving as Primary School Teacher (BPS-12) in Elementary & Secondary Education Department in District Kohat.

1. **That**, the said Muhammad Shakir Ex-PST at GPS No.1 Lachi Bala District Kohat has lodge an appeal before the Worthy Director Dated: 05.07.2023 (**Annexure-A**) seeking for his Re-instatement in Service against the mentioned post in District Kohat in view of the Judgement Dated 17.08.2023 of the Additional District & Sessions Judge-II, Kohat (**Annexure-B**) render in criminal appeal No.414/SC under case Titled Wagar Ahmad & other Vs State whereby, the appellant has been acquitted of charges leveled against the accused teacher in FIR No. 414 Dated: 05.08.2019 PS Lachi District Kohat under Sections 302/324/427/34 PPC (**Annexure-C**) Passed by the Additional District & Sessions Judge-II, Kohat with the Order that "**In view of the affidavit Ex-PA & Ex-PB proformas of compromise Ex:PC and Ex:PD coupled with the statements of LRs of the deceased regarding their compromise with nominated accused Muhammad Shakir & Waqar Ahmad, their waiver of rights of Qisas and Diyat etc. vis-à-vis their no objection over acquittal of the nominated accused from the charges levelled against them, the nominated accused Muhammad Shakir & Waqar Ahmad are acquitted from the charges levelled against them attached as (Annexure-D)**".
2. **That**, District Education Officer (Male) Kohat proceeded Muhammad Shakir Ex-PST at GPS No.1 Lachi Bala District Kohat under Rules-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011, on account of willful absence from official duties being absconder and imposed major penalty of "Removal from Service" upon him vide Notification Endst: No. **9586-92** Dated: **17-12-2019** attached as (**Annexure-E**).  
Therefore, in view of the above made facts of the case under reference, it requested that the Law Department, may kindly be approached for the grant of legal advice and opinion to the extent of Re-instatement in Service of the appellant as PST in BPS-12 in view of the Departmental Action taken by the then DEO under Rule-9 in shape of the Removal from Service vide Order Dated: **17-12-2019** instead of invoking the provision of Rules-05 of the E&D Rules, 2011 or otherwise so as to proceed further into the matter under the Rules in vogue please.

**Assistant Director (Estab-1)**  
Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

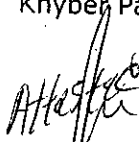
Endst: No.9752/

Copy forwarded to the:-

1. The District Education Officer (Male) Kohat.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Sd/-

**Assistant Director (Estab-1)**  
Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar





**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARIAT PESHAWAR**  
 (Phone No.091-9223587)

23

No. 50 (Primary M) & S D/5-19/Reinstatement/Muhammad Shakir/PST/Kohat/2022  
 Peshawar Dated 14<sup>th</sup> September, 2023

To,  
 The Director  
 Elementary & Secondary Education Department  
 Khyber Pakhtunkhwa, Peshawar.

407  
 14.9.23

**Subject: - REQUEST FOR GUIDANCE.**

I am directed to refer your letter No. 9751/F.No. 366/Appeal's-M, Dir Lower/1-stab(M-1) dated 01-08-2023 on the subject noted above and to state that the case has been examined which reveals that Muhammad Shakir Ex-PST has been acquitted from the charges in Criminal case by Additional District & Session Judge Kohat-II. If a Government servant is arrested or charged in a criminal case, then such Govt. Servant may be suspended if necessary under CSR-19-I, 19-I-CSR as reproduce below:

**"19-I CSR:** A servant of Government committed to prison either for debt or of a Criminal charge should be considered as under suspension from the date of his arrest, and not allowed to draw any pay until the termination of the proceedings against him, when an adjustment of his allowances should be made according to the circumstances of the case, the full amount being given only in the event of the officer being acquitted of blame or (if the imprisonment was for debt), of its being proved that the officer's liability arose from circumstances beyond his control".

2. Removal of Muhammad Shakir Ex-PST by DEO (M) Kohat merely on arrest/FIR against him is illegal in view of CSR-19-I mentioned above. After acquitted from Criminal Charges, Muhammad Shakir Ex-PST is required to be reinstated into Govt. service from date of his suspension. The absent period from duty shall be Extra Ordinary leave without pay.

3. However, if appeal is filed by the opponent party against the decision of Additional District & Session Judge Kohat-II then the rate of the teacher may be decided according to the decision of the appellent court.

*[Signature]*  
**ATTESTED**

*[Handwritten initials]*

Encl: of even No. & date:  
 Copy forwarded to the:

*[Handwritten date]*  
 16/9/23

*[Signature]*  
 (MUHAMMAD ISHAQ)  
 SECTION OFFICER (PRIMARY MALE)

1. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

*[Signature]*  
 10/9/23



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

No. 2225 /E.No. 366/Appeal/M/Dir Lower/Estab-1

Dated Peshawar the 09/10 /2023.

To


The District Education Officer  
(Male) Kohat.

Subject: **REQUEST FOR GUIDANCE**

Memo:

I am directed to refer to the subject cited above and to enclose herewith a copy of letter received from Section Officer (Primary-Male) vide his letter No. SO(Primary-M)/E&SED/5-19/Re-instatement/Muhammad Shakir/PST/2022 Dated: 14-09-2023 in respect of Muhammad Shakir Ex-PST at GPS No.1 Lachi Bala 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 & Sessions 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 (Estab-1)  
Directorate E& Secondary Education

ATTESTED

24

25

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

No. 7300 /Termination/PST (M)

Dated, Kohat, the, 16/10/2023

To

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

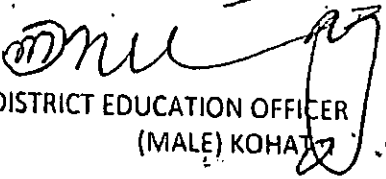
Subject: - **REQUEST FOR GUIDANCE**

Memo: -

I am to refer to your office letter No.8225/F.No./366/Appeal/M/Dir Lower/Estab:1 dated 09/10/2023 the subject cited above and state that the following requisite record/information is submitted herewith as desired please.

1. Copy of the FIR ..... (attached).
2. Copy of Judgment of Additional District & Sessions Judge-II, Kohat. .... (attached).
3. Affidavit on stamp paper of the opponent party duly attested by oath commissioner Tehsil Lachi District Kohat is attached.

Hence report is submitted for further perusal please.


  
DISTRICT EDUCATION OFFICER  
(MALE) KOHAT


16/10/2023

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

Copy to the: -

1. Section Officer (Primary-Male) E&SE Department Peshawar.
2. SDEO(M) Lachi.

  
ATTESTED

  
DISTRICT EDUCATION OFFICER  
(MALE) KOHAT

26

123

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.

NOTIFICATION.

Consequent upon approval of the Competent Authority (Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar), a committee comprising upon the following officers/officials is hereby constituted to probe into the matter and redress the grievances of the appellant namely Muhammad Shakir Ex-PST GPS No.01 Lachi Bala District Kohat regarding Appeal for Re-Instatement in Service.

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

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

(Encls: Attached)

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4411-12 /F.No.366/Appeal/M/Dir Lower/Estab(M-I)

Dated Peshawar the 2-11-2023.

Copy of the above is forwarded to the:-

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

ATTESTED

2/11/2023  
Assistant Director (Estab:M-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

w/c

9-1

10/11/21

Dear Sir,

It is requested that the current status of his duty status and recent part of PST-12 may also be provided with complete documentary support please

27

RECEIVED

10/11/21  
04/12/2023  
Dr: Director E-M-II  
Inquiry officer  
Deputy Director (PST)  
Elementary School Management  
Kuala Lumpur, Malaysia

Regd. (28)



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



No.

9372

Dated Kohat the

05/12/2023

To

The Deputy Director,  
Elementary & Secondary Education KP / Inquiry Officer

Subject:

CURRENT STATUS OF DUTY

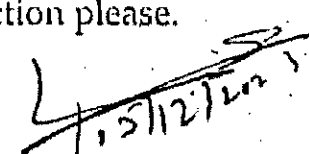
Memo:


I am directed to refer to the subject cited above and to state that Mr. Muhammad Shakir ex-PST GPS No.1 Lachi Bala Kohat was removed from service w.e.f 17-12-2019, now the honourable court acquitted him from criminal charges on the basis of their compromise.

Now his appeal is under consideration/under process in the next appellate authority i.e. Worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Furthermore, the post of PST (BPS-12) is also available / vacant in the Sub Division Lachi Kohat.

Hence, report is submitted for necessary action please.

  
Dy: District Education Officer  
(Male) Kohat

  
ATTACHED



29

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

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

23

ORDER-05  
17.06.2023



17/06/2023

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 Waqar Ahmad and Muhammad Shakir, by waving his rights of Qisas and Diyat etc expressing his no objection over acquittal of the accused Waqar 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

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12 DEC 2023  
EXAMINED COPIES BRANCH KOHAT

ATTESTED

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female LRs of the deceased through 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 along with 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 Waqar 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 the deceased are Ex:PL to Ex:PP on case file.

17/06/2023

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4. In view of the affidavit Ex:PA and Ex:F3, proformas of compromise Ex:PC and Ex:PD coupled with statements of 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 acquittal of the nominated accused from the charges levelled 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 Khan)  
Addl; Sessions Judge II,  
Kohat

a)

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12 DEC 2023  
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26

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

State Versus Waqar Ahmad & Other  
Case No.118/SC

ORDER-05  
17.06.2023

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 Waqar 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.
3. Record transpires that on 06.06.2023 complainant Muhammad Shoaib S/O Doran Khan appeared before the court, submitted affidavit besides recorded his statement confirming his compromise with the nominated accused Waqar 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

17/06/2023

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12 DEC 2023  
EXAMINED COPIES BRANCH KOHAT

ATTESTED

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compromise with the nominated accused Waqar 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 of deceased Sikandar 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 an application for recoding of statements of the female LRs of the deceased through 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 the 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

17/06/2023

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12 DEC 2023  
EXAMINED COPING BRANCH KOHAT

ATTESTED

34

28

17/06/2023

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 Hon'ble court acquit the nominated accused Waqar 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.

4. 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

*[Handwritten mark]*

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12 DEC 2023  
EXAMINED COPING BRANCH KOHAT

*[Handwritten signature]*  
ATTESTED

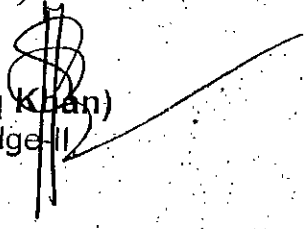
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the liability of bail bonds. Case property be kept intact till expiry of period of appeal/revision, where-after, be dealt with in accordance with law. File be consigned to the Record Room after its necessary completion and compilation.

Announced  
17.06.2023

(Muhammad Ishaq Khan)  
Addl. Sessions Judge-II  
Kohat



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12 DEC 2023  
EXAMINED COPING BRANCH KOHAT

ATTESTED

# DHQ TEACHING HOSPITAL KOHAT

## OUTDOOR PATIENT TICKET

Department: Heart OPD No: 9682

Name: \_\_\_\_\_ Father/Husband: \_\_\_\_\_

Age: \_\_\_\_\_ Gender: \_\_\_\_\_ Address: \_\_\_\_\_

CNIC NO \_\_\_\_\_ Contact No: 28/11/2023

36

BP  
Temp.  
Pulse  
Investigation

C/C  
R.

ECG  
Echo  
ABG  
RBS

Ren. fun. <sup>(02)</sup> weeks

MEDICAL OFFICER  
DHQ: Hospital, KDA, Kohat

SUI 14/09/80 BP 100/80  
CC  
H  
R.P.  
tel monitor  
tel Cardiomu  
tel ALP. 0.5 P  
tel Estar 10 P

# DHQ TEACHING HOSPITAL KOHAT

## OUTDOOR PATIENT TICKET

Department: SHAKIR OPD No: 1050

Name: \_\_\_\_\_ Father/Husband: \_\_\_\_\_

Age: \_\_\_\_\_ Gender: \_\_\_\_\_ Address: 14/12/2023

CNIC NO \_\_\_\_\_ Contact No: 9682

BP  
Temp.  
Pulse  
Investigation

C/C  
R.

ECG  
Echo  
RBS  
CDP

Cardiul Reni  
for <sup>(02)</sup> weeks

MEDICAL OFFICER  
DHQ: Hospital, KDA, Kohat

SUI  
tel Corburo  
tel Echo  
tel ALP. 0.5 P  
tel Estar 10 P



# DHQ TEACHING HOSPITAL KOHAT

## OUTDOOR PATIENT TICKET

Department: mslakhir OPD No: 970

Name: \_\_\_\_\_ Father/Husband: \_\_\_\_\_

Age: \_\_\_\_\_ Gender: M Address: f. 11-10-23

CNIC NO \_\_\_\_\_ Contact No: Kohat

37

BP	C/C
Temp.	<u>C/L SUI</u>
Pulse	<u>87 E BP, 100/20 mm - A</u>
Investigation	<u>R.</u>
ECG	<u>+</u>
ECHO	<u>C</u>
Carb. Panel	<u>R</u>
RBS	<u>Pass in Lm</u>
Complete Rest for 02 weeks	<u>inj Isophin dilute 1/10 slow start</u>
	<u>Tal Concor 2.5</u>
	<u>Tal Cardonar 1 + 1 + 100</u>
	<u>Tal Ibent folic 1</u>

MEDICAL OFFICER  
DHQ: Hospital, KDA, Kohat.

# DHQ TEACHING HOSPITAL KOHAT

## OUTDOOR PATIENT TICKET

Department: \_\_\_\_\_ OPD No: 4681

Name: \_\_\_\_\_ Father/Husband: \_\_\_\_\_

Age: \_\_\_\_\_ Gender: \_\_\_\_\_ Address: \_\_\_\_\_

CNIC NO \_\_\_\_\_ Contact No: 13/11/23

BP	C/C
Temp.	<u>SUI periodically</u>
Pulse	<u>R</u>
Investigation	<u>R. documented</u>
ECG	<u>Pass in Lm</u>
ECHO	<u>inj Isophin 1/10 slow</u>
Carb. Panel	<u>inj Loprat 40 p</u>
Hoffmann	<u>inj Provas 1/10 slow</u>
Complete Rest for 02 weeks	<u>inj Provas 1/10 slow</u>
	<u>Tal Nebivol 5</u>
	<u>Tal enon 5</u>
	<u>(+1 2007)</u>

MEDICAL OFFICER  
DHQ: Hospital, KDA, Kohat.

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# DHQ TEACHING HOSPITAL KOHAT

## OUTDOOR PATIENT TICKET

Department: J. Ch? OPD No: 15721

Name: \_\_\_\_\_ Father/Husband: \_\_\_\_\_

Age: \_\_\_\_\_ Gender: M Address: 27-10-23-

CNIC NO \_\_\_\_\_ Contact No: \_\_\_\_\_

BP	C/C	
Temp.		<u>Pass</u> <u>in</u> <u>in</u>
Pulse		
Investigation	R.	
ECG		<u>1mg digoxin</u>
Echo		<u>1/2 v shdr</u>
Cardium		<u>1mg Isophni</u>
		<u>1/2 v shdr</u>
		<u>1/2 monitor</u>
		<u>1/2 ALP. 0.5</u>
		<u>1/2 Esten</u>

*Adm. Complete 02 weeks*  
*1/2 v shdr*  
**MEDICAL OFFICER**  
 DHQ: Hospital, KDA, Kohat

# DHQ TEACHING HOSPITAL KOHAT

## OUTDOOR PATIENT TICKET

Department: J. Ch? OPD No: 1016

Name: \_\_\_\_\_ Father/Husband: \_\_\_\_\_

Age: \_\_\_\_\_ Gender: \_\_\_\_\_ Address: Kohat 25/19/23

CNIC NO \_\_\_\_\_ Contact No: \_\_\_\_\_

BP	C/C	
Temp.		<u>sub</u> <u>epi</u> <u>cardiac</u>
Pulse		<u>document</u>
Investigation	R.	<u>of</u> <u>upper</u> <u>HR</u>
ECG		<u>Pale</u>
Echo		<u>Pass</u> <u>in</u> <u>in</u>
RBS		<u>1mg Cordone</u>
		<u>in 10ml</u> <u>pld</u>
		<u>8 drops</u> <u>1/2</u>
		<u>shdr</u>
		<u>1/2 coner</u>
		<u>2.0</u>
		<u>1/2 Cordone</u>
		<u>1/2 ALP. 0.5</u>

*Complete 02 weeks*  
**MEDICAL OFFICER**  
 DHQ: Hospital, KDA, Kohat

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

**WAKALATNAMA**

Muhammad Shakir S/o Sanobar Khan

(Applicant)

(Appellant)

**VERSUS**

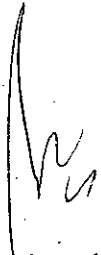
District Education Officer & Others

(Respondents)

(Defendants)

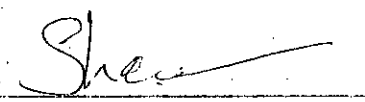
I, Muhammad Shakir (Appellant) in the above noted Appeal, do hereby appoint and constitute, Muhammad Amin Khattak Lachi ASC & M. Yaseen Hassan Khelvi Advocate High Court, to appear, plead, act, compromise, withdraw or refer to arbitration to me/us as my/our Counsel in the above noted matter, without 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.

CLIENT (S)



Advocate, Supreme Court of Pakistan.

M. Yaseen Hassan Khelvi

Advocate High Court.  
0345-4949553.

Yaseenhasankhelvi6@gmail.com