FORM OF ORDER SHEET.

Court of	-,
Implementation Petition No.	78/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1 .	2:	3
. 1	.17:01.2024	The implementation petition of Mr. Waseem
		Anwar received today by registered post through
,		Muhammad Arshad Khan Tanoli Advocate. It is fixed for
	[implementation report before touring Single Bench at
·.	 	A Abad on Original file be requisitioned.
-		AAG has noted the next date.
•		By the order of Chairman REGISTRAR
-	:	

E.P. No.78/2024

Him prodution position in appeal no.39/2019 received today i.e. on 2004 by registered pear is returned to the counsel for the petitioner with the following remarks

- Copy of application moved by the petitioner to competent authority for the implementation of judgment is not attached with the petition. If the application has already been preferred and reasonable period of 30 days has been expired be placed on file. If not, the same process be completed and then after approach to this Tribunal for the implementation of Judgment.
- Z. Annexures of the application is unattested.

 ${oldsymbol{artheta}}$ Annexure-D of the application is illegible which may be replaced by legible/better one.

76, 15.1, 0 10/1.12014

> REGISTRAR KHYBER PAKHTUNKWA SERVICE TRIBUNAL PESHAWAR

Muhammad Arshad Tanoti Adv. nigh Court A.Abad.

duly corrected as desired

Muhammah Ibrita Ken

CEPY of Rigisty will Secieved on 10/07/24 copy of Rigistry invelope are attached

Office # 22 Junuan Plaza Adjacent to

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Execution Petition No. 78/2024

CM No. /2024

IN

Service Appeal No. 39/2019

Waseem Anwar PSHT, Govt. Primary School Banda Pir Khan Abbottabad.

...APPELLANT

VERSUS.

Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

$\frac{\textbf{APPLICATION}}{\underline{\textbf{INDEX}}}$

S.#	Description	Page No.	Annexure
1.	Application for implementation of order alongwith affidavit	1 to 4	
2.	Copies of FIR dated 01/06/2012 and judgment date 22/02/2016	5 to 22	"A" & "B"
3.	Copy of suspension order dated 12/09/2012 and reinstatement order dated 29/04/2016	23 to 24	"C"
4.	Copy of order dated 16/02/2017 is attached as Annexure	25 to 100	"D"
5.	Copy of order dated 30/05/2016 of Junior Employees to the applicant	41	"E"
6.	Copy of service No. 39/2019 and order dated 18/06/2019	42.49	"F"
7.	Copy of application dated 15/10/2021 of this Honourable Tribunal	50	"G"
8.	Wakalatnama	51	

-		*APPLICAN
		Through
Dated:	/2024	
		(Muhammad Arshad Khan Yanoli
		Advocate Supreme Court of
	-	Pakistan
		At Abbattabad

(MUHAMMAD IBRAHIM KHAN)
Advocate High Court, Abbottabad

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA Khyber Pakhtuk Service Tribuin

Execution Petition NO. 78/2024 CM No. Diary No. 10 438

IN

Service Appeal No. 39/2019

Waseem Anwar PSHT, Govt. Primary School Banda Pir Khan Abbottabad.

...APPELLANT

VERSUS

- 1. Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 3. District Education officer (Male) Abbottabad.

APPLICATION FOR IMPLEMENTATION OF ORDER DATED 18/06/2019 OF THIS HONOURABLE TRIBUNAL PASSED IN SERVICE APPEAL NO. 39/2019.

Respectfully Sheweth; -

1. That the facts of the case are that the appellant/
applicant was falsely, implicated in Case FIR No. 522
dated 01/06/2012 under Section 302/324/34 PPC
Police Station Mirpur, Abbottabad. The applicant
was acquitted Honourably vide judgment dated
22/02/2016. Copies of FIR dated 01/06/2012 and
judgment date 22/02/2016 are attached as Annexure
"A" & "B".

- 2. That respondent No. 3 suspended the appellant/ applicant from service on 16/06/2012 and after acquittal reinstated him in service on 29/04/2016 w.e.f the date of suspension i.e. 16/06/2012. Copy of suspension order dated 12/09/2012 and reinstatement order dated 29/04/2016 are attached as Annexure "C".
- 3. That juniors to applicant were promoted from PST to SPST w.e.f 28/02/2013 but the applicant was promoted from PST to SPST w.e.f 16/02/2017 which should have been w.e.f 28/02/2013. Copy of order dated 16/02/2017 is attached as Annexure "D".
- 4. That the applicant was promoted from SPST (BPS-14 to PSHT (BPS-15) on 19/10/2017 which should have been w.e.f 30/05/2016 i.e the date of promotion of his junior counter part. Copy of order dated 30/05/2016 of Junior Employees to the applicant is attached as Annexure "E".
- 75. That the applicant filed service appeal No. 39/2016 regarding the above mentioned benefits which was disposed off with the direction to the respondents to decide the departmental appeal of the applicant vide order dated 18/06/2019. But no action has been taken by the respondents so far. Copy of service No. 39/2019

and order dated 18/06/2019 are attached as Annexure ACCOUNT OF THE "F"

That the applicant filed 2nd service appeal No. 1634/19 6. before this Honourable Tribunal but during the preliminary hearing it came to the notice that the previous order dated 18/06/2019 of the Honourable Tribunal is yet to implemented by the department. Hence, the appeal of the applicant was withdrawn to implementation petition before this Honourable Tribunal vide withdrawal application dated 15/10/2021 which was allowed vide order dated 15/10/2021 by this Honourable Tribunal. Copy of application dated 15/10/2021 is attached as Annexure "G".

In view of the above, it is prayed that respondents may be directed to implement order dated 18/06/2019 of this Honourable Tribunal.

> PPLICANT Through

/2024 Dated:

(Muhammad Arshad Khan Tanoli)

Advocate Supreme Court of Pakistan at Abbottabad

(MUHAMMAD IBRAHIM KHAN)

Advocate High Court, Abbottabad

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CM No.	/2024
	IN .
Service Ar	peal No. 39/2019

Waseem Anwar PSHT, Govt. Primary School Banda Pir Khan Abbottabad.

...APPELLANT

VERSUS

Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others.

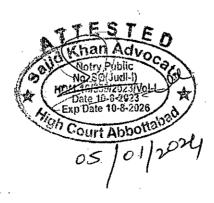
...RESPONDENTS

APPLICATION

AFFIDAVIT

I, Waseem Anwar PSHT, Govt. Primary School Banda Pir Khan Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

DEPONENT



ابدا أناطلا أريدك ابندانی اطلاع أسبت چرم فایل دسیت اندازی پولیس ر پور فیشره زیر دفعه ۱۵ بموم شابط قومبدادی ابندانی اطلاع اسبت چرم فایل دسیت اندازی پولیس ر پور فیشره زیر دفعه ۱۵ بموم شابط قومبدادی 302/329 كاردائي جونفيش كرمشاق كواكل اكراط فاع درج كزني ثن يترتق تعدا ووجه بال كرد تمانه نت رواتل كا بأرَقُ ووتت الزاطل فيحدن كرو 20 4 (2) 41/1/10 - 1/10 1/2/20 خان الزراولد كرديد كالهويان كالمراز لا مرجراً رے سا و در خرار حرار فرار مرع وال سما فالو شرفال رہو الروط رویہ فراس الراس في الوركود ي الدركما كدان سه معاد رميكول داش الوق برنا برنا بري جريدة ويتان الوري الر الماري عن هذا مرع على مدال رول على ورا مرود كان عرف ار عد 2 می فی ما رون از مثل رندا در می برسیر الا بر با از رون علی مثل از عالی مثل از ما از رون مثل از می از در مثل می از در مثل از می از در مثل الله دعو در از جرب ارام در مثل الله دعو در از جرب المورث المورث الله دعو در از جرب المورث الله دعو در از جرب المورث الله دعو در از جرب المورث المورث الله دعو در از جرب المورث المورث المورث الله دعو در از جرب المورث ا الد شال المرك في سل لسرا على تناريل مقتول بي الراس سان را رادو على الان الله لمن سائر الورك درى مدر في الرام المال مع الأسلام المرابع المال المرابع المال المرابع المعتول الم الله على المراس الله المراس ا

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IN THE COURT

Annex -B

L BIBL ADDITIONAL SESSIONS ABBOTTABAD



Case File No. 50/VII of 2012

 Date of Institution
 17/09/2012

 Date of Decision
 22/02/2016

09/2012

THE STATE

<u>VERSUS</u>

1. Waseem Anwar S/o Haji Anwar Javed,

2. Mst. Kausar Bano widow of Haji Anwar Javed residents of Morklan, Tehsil & District Abbottabad.

..... (ACCUSED FACING TRIAL)

CASE FIR NO. 552, DATED 01-06-2012 U/S 302/324/34 OF PAKISTAN PENAL CODE; POLICE STATION MIRPUR, ABBOTTABAD.

III, Abbottabad, has sent up this case for trial against accused Waseem Anwar and Mst. Kausar, on the allegations that on 01.06.2012 at about 2100 hours, within the criminal jurisdiction of Police Station Mirpur, Abbottabad, they along with juvenile co-accused committed the murder of deceased Mohammad Haroon S/o Abdur Rehman and Riasat S/o Ali Akbar by firing at them and caused injuries to Hamid Raza and Faisal Raza.

Brief facts of the prosecution case are that on 01.06.2012 at 2210 hours, complainant Faisal Raza S/o Abdul Hameed in injured condition accompanied by Mohammad Sohail S/o Mohammad Haroon at Emergency Ward of ATH, Abbottabad, reported the matter to the local police to the effect that at about 09:00 PM, a Jirga was convened in the house of Waseem Anwar to resolve the dispute over water

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wherein 8/9 persons participated. During the Jirga proceedings, and altercation took place with Waseem Anwar. Meanwhile Mst. Kausar Bano widow of Anwar Javed brought Kalashnikov from the nearby house and handed over the same to Waseem Anwar and commanded him to kill everyone. Waseem Anwar started indiscriminate firing with Kalashnikov as a result of which Mohammad Haroon S/o Abdur Rehman was hit on left side of his head and died on the spot, Riasat S/o Ali Akbar sustained bullet injury on his left cheek while Hamid Raza sustained firearm injury on his right forearm. Zeeshan Anwar inflicted hockey blows to the complainant on different parts of his body. Occurrence was stated to have been witnessed by Abdul Hameed S/o Mohammad Akbar and others present at the spot. Motive was disclosed to be the dispute over water. On the basis of this report, present FIR was registered against the accused.

After completion of investigation complete challan against accused Waseem Anwar and Mst. Kausar Bano was submitted while separate challan under JJSO was submitted against juvenile co-accused Zeeshan Anwar and entrusted to this Court for trial. After observing codal formalities within the meaning of 265-C Cr.P.C charge was framed against the accused to which they pleaded not guilty and claimed trial. In order to prove its case the prosecution has produced as many as sixteen (16) PWs and following is the gist of their statements:

i. PW-1 Constable Mohammad Arif No. 48 took parcels No. 2, 5,
 6 and 7 in the instant case to FSL through road certificate No.
 290/21 Ex PW-1/1.



3)

PW-2 Malik Muneer Ahmed S/o Aurangzeb identified dead body of deceased Malik Mohammad Haroon before the Police as well as before the doctor. He is also marginal witness to memo EX PW-2/2 through which IO took into possession garments of the deceased Mohammad Haroon.

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iii. PW-3 Khuwaj Mohammad S/o Sikander received the dead body of deceased Riasat through receipt Ex PW-3/1.

bore, one hockey stick from the spot.

PW-4 Wakeel Ahmed S/o Mumtaz Ahmed is marginal witness to recovery memo Ex PW-4/1 vide which IO took into possession blood stand earth from the places of deceased Mohammad Haroon and Riasat and one empty shell of 222

PW-5 Banaras Khan S/o Abdur Rehman is marginal witness to pointation memo Ex PW-5/1 through which accused Waseem Anwer while in handcuffs leaded the police party to the place of occurrence and pointed out various places at the spot. He is also marginal witness to recovery memo Ex PW-5/2 through which accused Waseem Anwer lead the police party to his cattle shed and took out rifle from beneath the empty bags, lying near the northern side of wall of the cattle shed, which was taken into possession by the IO.

vi. PW-6 Constable Fangresh No. 90 was entrusted with parcels No. 3 and 8 in the instant case for its delivery in FSL through road certificate No. 305/21 Ex PW-6/1 who after delivering the same in FLS returned the receipt to the Moharrir of PS for record.

PW-7 Mohammad Sajjad IHC recorded the report of complainant in the shape of Murasila Ex PA. He also prepared injury sheet Ex PW-7/1 and inquest report Ex PW-7/2 of deceased Mohammad Haroon deceased. He also prepared injury sheet Ex PW-7/3 of Mohammad Faisal, injury sheet Ex PW-7/4 of Hamid Raza, injury sheet Ex PW-7/5 of injured Riasat and upon death of injured Riasat his injury sheet Ex PW-7/6 and inquest report Ex PW-7/7.

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vii.

iv.

viii. PW-8 Fida Mohammad Khan Inspector registered FIR Ex PA/1 on receipt of Murasila.

PW-9 Dr. Khurram Medical Officer conducted autopsy on the dead body of deceased Riasat S/o Ali Akbar and found the following:-

External appearance:-

ix.

A middle aged man, aged about 40-42 years lying supine on Postmortem table wearing white colour *Shalwar Kameez*.

Rigor mortis not developed.

A stitched wound on the skull is noted. Another wound is noted on the left cheek on the zygomatic arch and pinna of left ear.

Tracheotomy wound is noted with dressing.

Cranium and Spinal Cord:

An entry wound of about 1-3 cm on the left side of zygomatic arch with exit at left posterior area behind Pinna with laceration of the Pinna noted.

Thorax:

Larynx and trachea:- Tracheotomy wound noted.

No other abnormality detected.

lanAbdomen:

No abriormality detected.

Muscles, bones and joints:

Already mentioned.

Remarks/Opinion:

In his opinion the death of the person occurred due to firearm injury to the skull, later he developed meningitis and ultimately death of the individual occurred.

Probable time that elapsed:

Between injury and death: about 22-23 days.

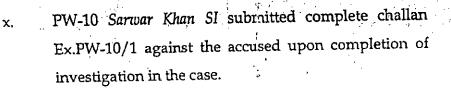
Between death and postmortem: within ten hours.

Six paged of postmortem report Ex PW-9/1 was handed over to the police by him.

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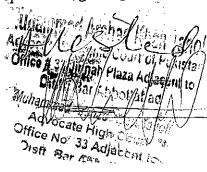


- xi. PW-11 Abdul Hameed S/o Mohammad Akbar supported the contents of Murasila in his examination in chief.
- xii. PW-12 Abdul Qayum S/o Mir Zaman stated that they were summoned in the Jirga and decided the matter in the Jirga. In the meantime, exchange of harsh words occurred between the parties. Waseem Anwar called for his rifle and some woman handed over the rifle to him and he started firing. He fired three shots. After hearing the firs shots, he decamped and did not know what happened thereafter.
 - PW-13 Fasal-Raza S/on Fidul Haspeed deposed that there was a dispute over water and they had summoned a Jirga. There were persons of the village in the Jirga and they also participated at about 08:00/09:00 PM. It was Maghrib time and there was also moon light. It was first of June. During conversation, exchange of harsh words took place between the parties. Jirga members separated them. In the meantime Kosar Bano raised a Lalkara and handed over rifle to Waseem Anwar and asked him to kill all the persons. Haroon went towards him to snatch rifle from him. First bullet hit Haroon and he died at the spot. Second bullet hit Riyasat on his face and then Hamid Raza received bullet in his arm during separation of the parties. Then Zeeshan came and he started giving hockey blows to him as a result of which he also received injury on left side of his abdomen with some hard object and thereafter, he became unconscious. Thereafter all the people decamped from the spot due to fear of death. They were taken to the hospital by the co-villagers while the dead body of Haroon was lying on the spot. After gaining

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senses in the hospital, he lodged instant report. Murasila Ex.PA was admitted to be correct and correctly signed by him.

xiv. PW-14 Dr. Junaid Sarwar conducted autopsy on the dead body of deceased Mohammad Haroon and found the following:-

External appearance:-

A middle aged man wearing whit Shalwar suit clad with blood. He was having white beard and head had been heavily bandaged. No postmortem lividity was seen while postmortem rigidity was slightly developing.

Wounds, Bruises, position, size, nature:-

- 1. A circular entry wound on the left temporal region near the Pinna about ½ inches in size with everted margins.
- 2. A large deep exit wound shattering the left zygomatic bone about 1½ inches in size and 1 inch deep with pieces of broken bone visible.

Cranium and spinal Cord:

Fracture and damaged corresponding to wounds described above.

Thorax:

No abnormality detected.

Abdomen:

Stomach and its contents: Semi-digested food contents.

No abnormality detected.

Muscles, Bones, Joints:

As above.

Remarks:

The death of the deceased occurred due to firearm injury, damaging the temporal lobe of the brain causing sudden cardio-pulmonary arrest and death.

Probable time that elapsed:

Between injury and death: within 30 minutes.

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Between death and PM: within six hours.

Six pages of postmortem report Ex PW-14/1 was handed over to the IO by him.

Vide MLC No. 397/12 dated 01 06.2012 he examined injured Faisal Raza S/o Abdul Hameed and found the following:-

A small laceration on the lower back left side about 1 inch in size which was skin deep.

Nature of injury: After X-Ray

Probable duration of injury:

within six hours.

MLC Ex PW-14/2 was admitted to be in his handwriting and correctly bearing his signature.

On the same day, he examined injured Hamid Raza S/o Abdul Hameed at 22:25 PM and found the following:

An entry wound on the right arm about 1/3 inches in size with inverted margins.

Nature of injury: After X-Ray and surgeon opinion.

Probable duration of injury: within six hours.

MI_C No. 396/12 Ex PW-14/3 was admitted to be in his handwriting, correct and correctly bearing his signature.

Vide MLC No. 295/12, he examined Riasat S/o Ali Akbar on 01.06.2012 at 22:15 PM and found the following:-

An entry wound on the left cheek on the zygomatic arch about 1/3 inch in size with its corresponding exit wound near the pinna of left ear about 1/3 inch in size with everted margins.

Nature of injury: After X-Ray and neurosurgeon opinion. Duration of injury: Within six hours.

MLC Ex PW-14/4 was admitted by him to be correct, in his handwriting and correctly bearing his signature.

PW-15 Dr. Aneega Khurram conducted X-Ray examination of injured Hamid Raza S/o Abdul Hameed and found the following:-

Communicated/shattered fracture of the right upper Half of the radius.

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P-000

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ii. No foreign body seen.

She admitted X-Ray report Ex PW-15/1 to be in her handwriting and correctly bearing her signature.

PW-16 Shabbir Hussain Shah SI conducted investigation in the case. He proceeded to the spot and prepared site plan Ex PW16/1 on the pointation of Abdul Qayum eyewitness of the case. During spot inspection, he took into possession blood stained earth from the place of Haroon deceased, blood stained earth from the place of Riasat deceased, from the place of accused Waseem Anwar one empty shell of 222 bore Ex P-4. He also took into possession one Hockey stick Ex P-5 from the spot of accused Zeeshan and sealed the same into parcel No. 5. On 02.06.2012 constable Almas No. 1271 brought blood soaked clothes containing one Qameez already exhibited as Ex P-1 and one Shalwar Ex P-2 white in colour, belonging to deceased Haroon which were taken into possession and sealed into parcel No. 5. Similarly a Qameez ExP-3, blood stained cream in colour belonging to injured Riasat was produced which was taken into possession and was sealed into parcel No. 6. He prepared recovery memo Ex PW-2/2 in the presence of marginal witnesses who signed the same as a token of its correctness. On 02.06.2012, injured namely Hamid Raza at ATH Hospital produced his blood stained clothes containing one Qameez Ex PA/1, Khaki in colour and disclosed that at the time of occurrence, he was wearing the said Qameez which was taken into possession by him and was sealed into parcel No. 7. He also prepared recovery memo Ex PW-16/2 on the spot in presence of marginal witnesses who signed the same as token of its correctness. On 02.06.2012, he raided the house of accused namely Mst. Kausar Bano with the hope to affect her arrest and to recover the weapon of

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offence. During the raid neither the accused was present nor any other illegal thing was found. In this respect he prepared house search memo Ex PW-16/3 in the presence of marginal witnesses thereof. On 02.06.2012, he vide his application Ex PW-16/4 sent parcel No. 1, 2, 5, 6 and 7 to FSL Peshawar for chemical analysis and report. On 02.06.2012, he arrested accused Zeeshan Anwar vide card of arrest Ex PW-16/5. On 02.06.2012 accused namely Waseem Anwar was arrested in injured condition who was admitted in DHQ Hospital Abbottabad in surgical "A" Ward Bed No. 35. On 03.06.2012, he vide his application Ex PW-16/6 applied for judicial remand of accused Zeeshan. On the same day, he applied Judicial Magistrate concerned for conditional judicial remand of accused namely Waseem Anwar who was arrested in injured condition and was admitted in DHQ Hospital, Abbottabad in Surgical-A Ward. On 08.06.2012 he vide application Ex PW-16/7, applied judicial Magistrate concerned for issuance of Zamima Bay of accused Waseem Anwar who was sent to jail on the conditional judicial remand. Application was allowed and Zamima Bay was issued for 11.06.2012. On 11.06.2012, he vide his application ExPW-16/8, applied judicial magistrate concerned for seven days physical remand of accused Waseem Anwar. Two days physical remand was granted. On 12.06.2012, accused Waseem Anwar while in handcuffs, lead police party to cattle shed and underneath the sacks lying towards southern wall of the cattle shed, himself took out rifle 222 bore ExPA/2 without number, Pak made without license loaded with magazine having 3 live cartridges of 222 bore, the weapon of offence, and handed over the same to him. He signed on the body of rifle with pointed object and the rifle/the weapon of offence was taken into possession by him and was sealed into parcel No.

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8. Similarly, 3 cartridges of 222 bore were taken into possession and were sealed into parcel No. 9. He prepared recovery memo Ex PW-5/2 already exhibited in the presence of marginal witnesses who signed the same as a token of its correctness. Similarly, he prepared pointation memo Ex PW-5/1 on the pointation of accused Waseem Anwar who while in handcufts lead the police to the place of occurrence and made pointation of place of occurrence. Such entry was also made in site plan Ex PW-16/1 with red ink. Similarly, he prepared recovery sketch Ex PW-16/9 of weapon of offence i.e. rifle 222 bore. On 02.06.2012, he prepared Ex PW-16/10, list of legal heirs of deceased Mohammad Haroon. After recovery of weapon of offence i.e. Rifle 222 bore ibid, he issued Docket Ex PW-16/11 for addition of Section 13 AO in the instant case. On 12.06.2012, he vide application Ex PW-16/12, sent parcel No. 8 containing rifle 22 bore along with parcel No. 3 containing bne empty of 222 bore to Firearms Expert for matching and report. On 07.06.2012, accused namely Mst. Kausar Bano produced her pre arrest bail order, which was later on confirmed. He placed the order on record. He also prepared list of legal heirs of deceased Riasat which is Ex PW-16/13. On the receipt of Report of FSL Ex PY, he placed the same on record. Similarly, he received the report of Firearms Expert Ex.PZ and placed it on file. Both the reports were in positive. During the course of investigation he recorded the statements of PWs. After completion of investigation, he handed over case file to SHO concerned for further proceeding.

Prosecution closed its evidence on 22.04.2015 and thereafter statement of accused u/s 342 Cr.P.C. was recorded wherein they again professed innocence and refuted the charge levelled against

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them, however, neither wished to be examined on oath u/s 340(2) Cr.P.C nor to produce evidence in their defense.

- I have heard Mr. Zia Ullah Wazir, Learned APP for the state assisted by Mr. Mehdi Zaman Advocate and Miss Sehrish Habib Advocate learned counsel for complainant, and Mr. Fazal-e-Haq Abbasi Advocate for accused and perused the record with their able assistance.
- In this case, the prosecution had to prove that on 01/06/2012 at 2100 hours, in the landed property belonging to Ali Asghar in village Morklan within the criminal jurisdiction of police station Mirpur, Abhottabad the accused facing trial Mst. Kausar Bano brought Kalashnikov and by handing over the same to accused facing trial Waseem Anwar commanded him to kill all Jirga members whereupon he started indiscriminate firing as a result of which Muhammad Haroon got hit and died at the spot while Riyasat Ali was hit on his face and died later on. Likewise from the same firing one Hamid Raza sustained firearm injury on his wrist/arm.
- The entire prosecution case hinges upon; ocular evidence furnished by PW-13 who is complainant/injured and Abdul Hameed PW-11 the eye witness, medical evidence furnished by PW-9 & PW-14, evidence of recovery of crime empties furnished by PW-16, recovery of blood stained articles coupled with FSL report, recovery of weapon of offence i.e riffle 222 loaded with magazine having 3 live cartridges Ex PA/2 and motive for the occurrence as stated by PW-13.

6)

The facts regarding, cause of death of deceased, the time and venue of occurrence as reported in the case are proved through medical evidence and evidence regarding collection of blood stained earth Arom the reported place of deceased with their blood stained garments coupled with FSL report Ex.PY speaking that all these articles were stained with human blood of the same group. These) facts have not been challenged by the defence, therefore, evidence

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regarding these facts is not needed to be discussed in detail and it stands proved on record that deceased *Muhammad Haroon* and *Riayasat Ali* were done to death through firearm shots and *Hamid Raza* sustained firearm injury in the occurrence taken place on 01/06/2012 at about 2100 hours at the reported place of village *Morklan*.

As far as the prosecution charge for commission of reported offence against the accused facing trial is concerned, the prosecution is heavily relying on the ocular testimony furnished by eyewitness of the occurrence i.e. the complainant (PW- 13) and PW-11 as direct evidence of charge while motive behind the occurrence, recovery of blood stained earth and garments of the deceased, crime empties, recovery of weapon of offence and medical evidence as corroborative pieces of evidence. The accused facing trial have been charged in this case in the manner that on the given date and time they committed offence of murder by killing the deceased through firing made by Waseem Anwar on the command of Mst. Kausar Bano while the other co-accused Zeashan Anwar supported and assisted him and also inflicted blows to injured with hockey, who being juvenile has been tried separately.

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As per FIR, two eyewitnesses were introduced in the case who were examined as PW-11 and PW-13. These witnesses in their statement before the court gave ocular account of occurrence but their evidence is not believable, for the reason that both the witnesses have contradicted each other on material points and their statements are neither consistent nor corroborated by each other. Perusal of the statements of complainant (PW-13) and Abdul Hameed (PW-11) reveal that in his statement, PW-11 has not only failed to mention date, time and place of occurrence but also given the number of Jirga members as 4/5 persons. Likewise, according to this PW accused facing trial Waseem Anwar asked co-accused Mst. Kausar Bano to bring his riffle from the house and she asked him to kill all the

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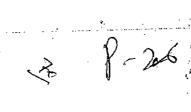
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persons whereupon accused Waseem Anwar fired four shots. In sharp contrast to him; complainant as PW-13 stated that the occurrence took place at Maghrib Vela when on exchange of harsh words between the parties Mst. Kausar Bano raised a Lalkara and by handing over rifle to Waseem Anwar asked him to kill all the persons. Similarly, according to PW-11, first bullet hit Hamid Raza whereafter Malik Haroon ran towards Waseem Anwar and requested him not to fire, he would resolve the dispute in the name of Allah but accused fired at him from close range hitting him on his face as result whereof he died at the spot, while third fire shot hit his nephew Riayasat. Whereas contradicting him, complainant (PW-13) stated that first bullet hit Haroon and he died at the spot, second bullet hit Riasat and then Hamid Raza received bullet injury on his arm. Likewise, in his cross examination PW-11 stated in clear terms that the occurrence took place at Shaam Vela and denied the occurrence to have taken place at 2100 hours and thus negated the version of FIR wherein the time of occurrence has specifically been mentioned as 2100 hours. It is noteworthy that as per record, the FIR Ex PA was lodged on the basis of Murasila incorporated by Sajjad IHC at ATH, Abbottabad, where the matter was reported by complainant Faisal Raza in Emergency Ward but surprisingly. PW-11 during his cross examination deposed that it was he who lodged the report to police at the spot and his statement was also recorded there, which are glaring and material contradictions in the evidence of both the ocular witnesses. It merits mention here that the statement of the eye witness (PW-11) was recorded by the police after lapse of about 04. days of the occurrence without any plausible explanation on record, which delay renders his reliability doubtful. No doubt, in a criminal case conviction of accused can be based on the statement of solitary witness even without corroboration but the condition is that the withess should be absolutely dependable. Applying this principle of appreciation of evidence in the instant case, it transpires that the evidence of complainant and eyewitness (PW-11) cannot attain that high standard on which conviction can safely be based on their

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testimony. Moreover, admittedly there is a cross FIR registered by

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accused facing trial Waseem Anwar charging therein the present complainant and eyewitness along with others for criminally trespassing into the house of accused Waseem Anwar and attempt at their lives which fact has frankly been admitted by the eyewitness (PW-11) in the following manner:

"It is correct that we all were also charged for criminally trespassing into the house of Waseem Anwar and giving stick blows to Samina Kosar and breaking the household articles."

9) No doubt the prosecution also introduced one Abdul Qayyum as eyewitness and recorded his statement as PW-12 but his statement is of no help to the prosecution because this witness has neither mentioned date, time or place of occurrence nor narrated any facts reasonably connecting the accused facing trial with the commission of offence as according to him he on hearing fire shots decamped from the spot and didn't know what happened thereafter.

Admittedly, the occurrence took place during night time. None of the eyewitnesses mentioned the source of light at spot in the FIR or statement recorded under Section 161 Cr.P.C. Similarly, no source of light was mentioned in the site plan nor any bulb was taken into custody but the IO but later on while appearing before the Court, the eyewitnesses introduced the presence of emergency light at the spot of occurrence, which is a glaring improvement.

In the present case, the prosecution has failed to produce any witness to support and corroborate the complainant on the ocular side of the occurrence. The alleged eyewitness of the occurrence has contradicted the complainant on material aspects of the case. In such direcumstances, the testimony of only the complainant cannot be held sufficient for the proof of the prosecution case.

As per the prosecution case, one crime empty of 222 bore was recovered from the spot. But even if this recovery is taken as proved

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mechanical manner and did nothing towards proper investigation of the case. As such, the present case was badly handled by the local police as well as the investigation officer.

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- In view of the above facts this Court is of the view that story of the prosecution is highly doubtful and it is not safe to base conviction of accused on such evidence. For giving benefit of doubt it is not necessary that there should be many circumstances creating doubts. A single circumstance creating reasonable doubt in a prudent mind about the guilt of accused makes him entitled to its benefit, not as a matter of grace and concession, but as a matter of right and there are more than one such doubts in the present case. Where evidence creates doubt about truthfulness of prosecution story, its benefit has to be given to the accused without any reservation. Drawn wisdom from the following rulings of apex court and august Peshawar High Court:
 - i) 1995 SCMR 1730
 - ii) 1997 SCMR 25
 - iii) 2009 SCMR 230
 - iv) PLD 2004 Peshawar 299
 - v) 2012 MLD 441 (Peshawar)
 - For the reasons stated herein above, it is safely concluded that the prosecution has miserable failed to prove its case against the accused facing trial beyond shadow of doubt, benefit of which would definitely go in favour of accused facing trial. Therefore, by extending benefit of doubt the accused facing trial Waseem Anwar S/o Haji Anwar Javed and Mst. Kausar Bano widow of Haji Anwar Javed residents of Morklan, Tehsil & District Abbottabad are acquitted of the charges leveled against them in case FIR No. 552 dated 01/06/2012 U/S 302/324/ 337F(v)/34 PPC police station Mirpur, Abbottabad. Mst. Kausar Bano is on bail, her bail bonds stands cancelled and the sureties are absolved from the liabilities of bail bonds. Accused Waseem Anwar is in custody, be released forthwith if not required in any other crime. The case property be disposed of according to law after the expiry period of appeal/revisions.

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File be consigned to the Record Room after its compilation and completion,

ANNOUNCED 22/02/2016

PHOOL BIBI ADDITIONAL SESSIONS JUDGE-II, ABBOTTABAD.

CERTIFICATE

Certified that this judgment consist of seventeen (17) pages, and each page has been read, checked, corrected and signed by me where necessary.

PHOOL BIRI
ADDITIONAL SESSIONS JUDGE II,
Abbottabad.

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OFFICE OF THE

IVE DISTRICT OFFICER (E&SE) ABBOTTABAD

SUSPENSION

Annex - 9

Consequent upon the approval of Competent Authority, Mr. Wasim Anwar PST Finally School Paswal Mian is hereby placed under suspension with effect from 16.6.2012 till further orders as he is involved in the murder case.

- Photo" 1. Necessary entry to this effect should be made in his service book
 - 2. Subsistence allowance is hereby allowed as admissible to him under the rules during suspension period.

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EXECUTIVE DISTRICT OFFICER ELEM: & SECY: EDUCATION ABBOTTABAD

Findst: No. 13-63 1/F.No.18/Vol-II/EB-II/(M)Pry: Dated 1 - 9 /2012

Copy to the:-

- 1. Deputy District Officer (M/P) Abbottabad w/r to his No.1936 dated 03.9.2012.
- 2. Head teacher GP\$ Paswal Mian Abbottabad

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTARAD

RE-INSTATEMENT

Consequent upon the acquittal of the changes leveled against Mr. Waseem Anwar Ex-PST Government Primary School Paswal Main in case FIR No. 552 dated 01.06.2012 U/S 302/324/337/F (V) / 34/PPC police station Mirpur vide Additional Sessions Judge-II Abbottabad judgement dated 22.2.2016 he is re-instated & further adjusted against the vacant post of PST (B-12) at Government Primary School Begakote on his own pay & grade in the interest of Public service with immediate effect.

DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst. No 33/5/F.No.18/Vol-III

Dated 29-4-/2016

Copy of the above is forwarded to thé:-

- 1. District Account Officer Abbottabad.
- Sub Divisional Education Officer (Male) Abbottabad w/r to his No. 825 dated 15.04.2016. a/w Service Book
- Teacher concerned.

DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Please read date of Re-instatement w.e.f. 16.06.2012 in r/o Mr. Waseem Anwar Ex PST GPS Begakote issued vide this Office Endst: No.3315 dated 29.04.2016

Sd/DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst: No. 5295 / F. No.14/Vol-V

Dated 2//6 0016

- 1. District Accounts Officer Abbottabad.
- 2. Sub Divisional Education Officer (Male) Abbottabad w/r to his No. 825 dated 15.04.2016

3. Teacher concerned.

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DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

OFFICE OF THE DISTRICT ED

OFFICE ORDER

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Consequent upon the recommendations of the departmental promotion committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(88A)/1-8/EBSE/2012 dated 11/7/2012 and Finance Department Endorsement No SO(FN)/FD/to-22(E)/2010 dated 16/7/2012, the following Male PST,s BPS-12 are hereby promoted to the post of Senior Primary School teacher BPS-14(Rs.8000-610-26300) Plus usual allowances as admissible under the rules on the regular basis under the existing recruitment policy of the Provincial Govt: Notified vide No SO(FE)14-5/SSRC/Meeting/2012/teaching cadre dated 13/11/2012 on the terms and conditions given bellow with immediate effect in the interest of public service.

Total No. of PST (M) Posts	2622
No. of Senior Primary School Toacher as per breakup	754
Share of promotion of Sentor Primary School Teacher BPS-14 as per breakup	754
Nel to be promoted as Senior Primary School Teacher BPS- 14	570
No of Deferred. Cases due to reasons noted in working papers.	0.07

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S.No	s/list. no	Name of Teacher	Father Name	School	Circle	Promoted as SPST BPS 14 and posted as under	Positing Circle	
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١	1309	All Abser	Mir Albir Khen	GPS Nach Pareen	нара Сай	GPS Nagri Payean	Нара Сая	
2	1791	Muhammad Shakeel	HAUL UR-REMAH	GPS Bandi Make	HATHIAGALI	GPS Band Make	Nelhio Gat	
3	1391	Helses Ahmad Abbasi	After Ahmad Abbast	GPS RaM	Lars	GPS Chentat	Lora	
	1394	Asiz-ur-Rehman	Baloo Khan	GPS Kurll	Girote	GPS Kurll	Ghole	
5	1195	Shabble Ahmed	ម៉ាក់ដែ-មា-និសាលខា	GMPS Obers Ratusia	Ohamiour	GPS HARAND .	Dhamlour	
l,	1376	M. Wibiced	S. M. Ailam	GPS GEAH	NATIBAGAU	GPS Dakhan Natorita	Nathia Gall	
7	1390	MINT AHMED	SAWAH DAMMAKUM	GPS Gand) Fir Khan	0/^634	GPS Danda Pir Khan	O/Abad (2	
	1101	Shout as All	M, Ajrib	GPS Charat	Lora	GPS Chanati	Lora	
:	1402	Anahammad Ashraf	ALI ZAMAN .	GPS Chahan	NATHIAGAU	GPS Chahan	Nathia Gall	
10	1404	1110 Marret	Our-iman	GMPS Malra	AO1	GPS Gell Meeran	Doi	
	1.06	IEHVHSTE	M SULEMAN	CPS NITH GIG	MATHIAGALI	GPS Nathia GAS	Mathia Gali	
<u> </u>	1407	Muhd Javed	Mubahat Khan	Grs xura	Airate	GPS Eura	Birote	
<u> </u>	1 1100	nsO-bU-jav2	Taj Muhammd	GPS BATE ARA	HATHIAGAH	GPS Ratnara	Nathia Gail	
	1109	Haran-uffathted	M, Fargon	CB\$ Operal	Sherwan	GPS Bhuraj	Sherwan	
11	1110	M table awas	Ahdul jabi AWan	Gps Midath		GPS Mirjaith	Havelian	
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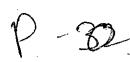
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				·		Promoted as SPST	
				Sebool	Circle	BPS 14 and posted	Posting Circle
3.No[³	S/list.	Name of Teacher	Father Name	School	Oncia	as under	
	NO	·			Havellan	GPS Havellan Village	Havellon
19	1417	Tonveer illahi	A 1001 (111-02	GPS Havelain village		GPS Daniel Ohundan	
201	1419	MUHAMMAD HANEEF	MUHAMMAD MASKEEN	GPS DANDI OHUNDAN	Q/Abad		C/Abad
			Ghor Rehman Khan	GPS Langra	Havellan	GPS Gherwat	Havetlan
-21		Attile Ahmed Khan		GPS Mujahid Abad	Ohamiaui	GPS Mujehid Abad	Diramiour
. 22	1411	Birryamin	S.Shah Pir	GPS Table Camp	Dhamlour	GPS Taxia Camp	Dhanilour
23	1413	S.Tariq Zahid		GPS BALDHERI MAIRA	Q/Absd	GPS Baldheri Malea	D/Abad
24	1424 SYED ZIA HUSSAIN SHAH SYED MOHAZAM SHAH		SYED MORAZAM SAAN		BOI	GPS Kukmong	Ω of
25	1425	M. Rasheed	Abdul Letif	GPS Kuhmang	Sherwan	GPS F K Khan	Sharwan
28	1426	Haanain Akhtar	Abdul Cayyum	GPS PK, Xhan	O/Abid	GPS MARTOI	O/Abad
27	1427	SAGHIR AHMAD	M. YOUSAF QURESHI	GPS MANGAL	NATHIAGALI	GPS Kundta	Nathie Gat
25	1428	MAHZAR XHAN	IALAL KHAN	GPS Kurt raiki	Havetian	GI'S Sajwal	Havellan
29	1419	Abdul waheed then	Abdul Latif khan	Gps (2)wal	Haveilan	GPS Yanakt	Havellan
30	1430	Afrai ahmed	Montah Ahmed	Gps tanasa	A10	GP5 4 6 ATO	Ald
31	1434	M. Ahsan Qall	Abdul Khafiq	GPS# 6 Ald	Dhamiour	GPS maran weeran Gall	Dnamout
32		Muhammad Mastr	Muhammad Ajab	GARPS Bronglata		GPS Thattil Allened Khan	Sherwan
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	2 1451	M. Natir	Muhammad Jan		Hapa Gal	GP5 Upper Karach	Hajla Gall
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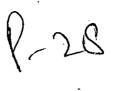
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	 	Strirat Khan	Ali Zaman	GPS Pummanimar	Hajia Gali	GPS Pummanmar	
86	1539	Zulligar Ahmed	Abdul Wasah	GPS Kun) Qadeeni	ATO		Hajle Gali
90	1541	M.Shabble	Sardar Khan	GPS Hairlan		GPS Kuni Gadeem	Ald
91	1544	litt Ahmed	Sultan Muhanymad	GPS Kalanda	Hajia Gell	GPS Histon	Hajia Gali
92	1549	AFSAR KHAN	ABBUR REHMAN		Hejia GeQ	GPS Hirian -	Hala Gan
93	-	Muhammad Kalegm	· · · · · · · · · · · · · · · · · · ·	GPS BATALA	Havelan	GPS Batela	Havellan
94		 	Muhammad Rafique	GPS Sherwan	Sherwan	GPS Sherwan	Sherwan
		Sald Jabbar	Mir Bas	GMPS Kalls	Sherwan	GPS Lakhais	Sherweit
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96	1570	M ALTAF	GULISTAN	GPS Katal Kote •	NATHIAGALI		Sherwan
97	1572	Khalld Mehmood	M.Zeman :	GPS Rials		GP\$ Keleltate .	Nebhie Gall
91	1573	UMER KHATAB	Mir Hussan	GPS NATHI GAU	Xaja Gali	GPS RSala	Нейа Сан
99	1575	IMTIAZ ALI	LAL AKBAR		MATHIAGALI	GPS Ohuien	Nathia Gat
100	1576	Abdul Malik Khan		GPS IANSA	NATHIAGALI	GPS Jensa	Nathia Gall
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	_	Sadaquat Hussain	M. Yaussí	GPS Talaq Ban	\$OI	GPS Taleg Ban	
105		Athar Khan	M. Hafeeq Khan o	GPS MAGRITARAU	Havellan .		Sol .
100	1506	M naslm khan	M.Atam khan	Gps Sultangus	Havelian	GPS Magri Tarali	Havellan ·
107	1588	MASHID HUSSAIN	ZAMURAD HUSSAIN			GPS Sultan Pur	Havelian
			ZAMUKAU HUSSAIN	GPS BANDI DHUNDAN	Q/Abad	GPS Nikka Pank	0.43
100	1519	iltal ahmed	Fide Muhmmad	Gps Mohra Jhapgra	Havelin	GPS Mohere Jhangre	Q/Abad
109	7730	M.Ashzaf	Abdul Latif	GPS Malikpura	AYO		Havellan
110	1591	M,Ahsan Khan	C.M.Nias Khan			GPS Malikpure	Ald
511	1593	SAIR AID BENDARI WAR		GP3 #1 Nawan Star	ATO I	GPS # 1 Nawen Sher	Ald V
		SAIF-UR-REHMAN KHAN	ALI ASGHAN KHAN .	GPS RIYAN DA MAIRA	Q/Abad :	GPS Maka Murafar	-
112	1594	HAR HUSSAIN SHAH	AU ASGHAA SHAH	GPS KÁLI DRAR			VIQ //
113	1595	10. 5.1.		U. S. OKID DINAM	Q/Abad	GPS Kall Ohar	O/Abad "" &
	· · · · ·	M. Saleam	M, Shafi	GPS Dabban	8OI	GPS Gabban	Bol 2
114	1396	Nazir Ahmed	Noor Muhammad	GPS Althreels No.1	Ohumiour	GPS Akhreels No.1	1
							
115	1597	Safid khan	Sakhawes khan	Gps havelaln village			Dhamlour
115	1597	Safid khan M.Saffiudin		Gps haveleto village	Havelian	GPS Havellan Village	Havelan
	1597	M.Salfludin	Sakhawet khan Allauddin	Gps haveletn village GPS #1 Ard	Havelian ATO		
116	1597 1598 1599	M, Tariq Javed	Sakhawat khan Allauddin Adul Hameed	Gps havelate village GPS #2 And GMPS Mehal	Havelian ATO Showan	GPS Havellan Village	Havelan
116 117	1597 1598 1399 1600	M. Salfludin M. Tariq Javed Zahid Mehmood	Sakhawet khan Allauddin Adul Hameed Rehamatullah khan	Gps haveletn village GPS #1 Ard	Havelian ATO	GPS H 2 Ard	Havelan Ald
116	1597 1598 1599 1600 1601	M.Salfludin M. Tariq Javed Zahld Mehmood Abdul Rasheed	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Noor Ahmad	Gps havelate village GPS #2 And GMPS Mehal	Havelian ATO Showan	GPS Havellan Village GPS II 2 Ard GPS Gohn	Havelan Ald Shenvan Dhamlour
116 117	1597 1598 1599 1600	M. Salfludin M. Tariq Javed Zahid Mehmood	Sakhawet khan Allauddin Adul Hameed Rehamatullah khan	Gps havelate village GPS #1 AId GMPS Mehal IICA Dhamlour	Havellan ATQ Sherwan Ohamtour	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS IICA Dhamtour GPS Masina Kalan	Havelan Ald Shervan Dhamlour Bol
116	1597 1598 1599 1600 1601	M.Salfludin M. Tariq Javed Zahld Mehmood Abdul Rasheed	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Noor Ahmad	Gps havelate village GPS #2 And GMPS Mehab IPCA Dhamtour GPS Masina Kalari	Havelian ATO Sherwan Ohamtour OOI Havelian	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS IICA Dhamtour GPS Masina Kalan GPS Magel Bala	Havelan Ald Shenyan Dhamlour
116 117 118 119 120	1597 1598 1599 1600 1601 1602	N.Saffudin M. Tariq Javed Zahid Mehmood Abdul Rasheed M saeed ABDUL NISAR	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Naor Ahmad M Janraf CALANDAR KHAN	Gps havelain village GPS #2 Aid GMPS Mahai IICA Dhamtour GPS Masina Kalan Gps magri bala GMKS LUNDI (Galangi De Moheril	Havellan ATQ Sherwan Ohamtour OOI	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS IICA Dhamtour GPS Masina Kalan	Havelan Ald Shervan Dhamlour Bol
116 117 118 119 120 121	1597 1598 1599 1600 1601 1602 1603	M.Saffiudin M. Tariq Javed Zahld Mehmood Abdul Rasheed M saeed ADDUL NISAR Muhammad Zahid	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Noor Ahmad M ahraf CALANOAR KHAN Muhammad Ashvaf	Gps havelain village GPS #2 Aid GMPS Mehal JICA Dhamitour GPS Masina Kalan Gps magri bala GMKS LUNDI (Batangi De	Havelian ATO Sherwan Ohamtour OOI Havelian	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS IICA Dhamtour GPS Masina Kalan GPS Magel Bala	Havetan Aid Shervan Dhamlour Bol Havellan
116 117 118 119 120 121 122	1597 1598 1399 1600 1601 1602 1603	M.Saffudin M. Tariq Javed Jahld Mehmood Abdul Rasheed M saeed ADDUL NISAR Muhammad Zahid Abdur Rehman	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Naor Ahmad M Janraf CALANDAR KHAN	Gps havelain village GPS #2 Aid GMPS Mahai IICA Dhamtour GPS Masina Kalan Gps magri bala GMKS LUNDI (Galangi De Moheril	Havellan A10 Sherwan Ohamtour OOI Haveban O/Abad	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS II CA Dhamtour GPS Masthe Kalan GPS Magd Bala GPS Banda Lamba GPS Ihafar	Havelan Ald Shenvan Chamlour Bol Havelian O/Abad Dhamlour
116 117 118 119 120 121	1597 1598 1599 1600 1601 1602 1603	M.Saffiudin M. Tariq Javed Zahld Mehmood Abdul Rasheed M saeed ADDUL NISAR Muhammad Zahid	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Noor Ahmad M ahraf CALANOAR KHAN Muhammad Ashvaf	Gps havelain village GPS #2 Aid GMPS Mahas IICA Dhamiour GPS Maslina Kalan Gps magri bala GMKS LUNDI (Batangi De Moshetil GPS Shafar	Havellan ATD Sherwan Ohamtour OOI Havellan Q/Abad Ohamrour BOI	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS IICA Dhamtour GPS Mastha Kalan GPS Magd Bala GPS Banda Lamba GPS Ihafar GPS Riyala Stalkot	Havelan Ald Shervan Chamlour Bol Havelian O/Abad Dhamlour Bol
116 117 118 119 120 171 122 123	1597 1598 1599 1600 1601 1602 1603 1604 1605	M.Saffudin M. Tariq Javed ZaNid Mehmood Abdul Rasheed M saeed ADDUL NISAR Muhammad Zahid Abdur Rehman Wagar Khan	Sakhawat khan Allauddin Adul Nameed Rehamatuliah khan Noor Ahmad Mainraf CALANGAR KHAN Muhammad Ashraf All Khan Khalli Ur Rehman	Gps havelain village GpS #2 Aid GMPS Mahai IICA Dhamtour GPS Maslina Kalan Gps magri bala GMKS LUNDI (Batangi De Mojheril GPS Ihafar GPS Ohand Kalan GPS Chonakari	Havellan ATD Sherwan Ohamtour OOI Havellan Q/Abad Ohamrour BOI ATD	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS II CA Dhamtour GPS Masthe Kalan GPS Magd Bala GPS Banda Lamba GPS Ihafar	Havelan Ald Shenvan Chamlour Bot Havelian O/Abad Dhamlour
116 117 118 119 120 121 123 124	1597 1598 1399 1600 1601 1602 1603 1604 1605 1606	N.Saffudin M. Tariq Javed Zahld Mehmood Abdul Rasheed M taced ASDUL NISAR Muhammad Zahid Abdur Rehman Wagar Khan S. Ya rawar Hussain Shah	Sakhawat khan Allauddin Adul Nameed Rehamatuliah khan Noor Ahmad Mainraf CALANGAR KHAN Muhammad Ashraf All Khan Khalli Ur Rehman	Gps havelain village GPS #2 Aid GMPS Mehal IICA Dhamiour GPS Masina Kalan Gps magri bala GMKS LUMDI (Balangi De Moberil GPS Shafar GPS Ghand Kalan	Havellan ATD Sherwan Ohamtour OOI Havellan Q/Abad Ohamrour BOI	GPS HaveRan Village GPS # 2 Ard GPS Gohn GPS IICA Dhamtour GPS Mastha Kalan GPS Magd Bala GPS Banda Lamba GPS Ihafar GPS Riyala Stalkot	Havelan Aid Shervan Dhamlour Bol Havelian O/Abad Dhamlour Boi Aid
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116 117 118 119 120 121 122 123 124 125 128	1597 1598 1599 1600 1601 1602 1603 1604 1606 1606 1607	N.Saffudin M. Tariq Javed Jahld Mehmood Abdul Rasheed M saeed ADDUL NISAR Muhammad Zahid Abdur Rehman Waqar Khan S. Tarawar Hussain Shah MIJHAMMAAO, Hanif SHDAIB ISLAM	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Naor Ahmad Mathraf CIALANDAR KHAN Muhammad Athraf All Khan Khalif Ur Rehman S. Zakir Hussalo Shah	Gps havelain village GPS #2 Aid GMPS Mehal IICA Dhamtour GPS Masina Kalan Gps magri bala GMKS LUNDI (Batangi De MGPS INAIT GPS Oband Kalar GPS Chanali	Havellan ATD Sherwan Ohamtour GOI Havellan Q/Abad Ohamsur BOI ATD Lora	GPS HaveRan Village GPS II 2 Ard GPS Gohn GPS IICA Dharntour GPS Mastha Kalan GPS Magd Bata GPS Banda Lamha GPS Ihafar GPS Rivala Statkot GPS Choona barl GPS Choona	Havelan Ald Shervan Dhamlour Bol Havelian O/Abad Dhamlour Boi Ald Lora Nalhia Gail
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116 117 118 120 121 122 123 124 125 126 127	1597 1598 1399 1600 1601 1602 1603 1604 1605 1606 1606 1609 1610 1610	N. Saffudin M. Tariq Javed Zahld Mehmood Abdul Rasheed M taeed ABDUL NISAR Muhammad Zahid Abdur Rehman Wagar Khan S. Yarawar Hussain Shah MUHAMMAAO, Hanif SHOAIB ISLAM M. Saizem Imran Khan M RISHAO	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Noor Ahmad M ashraf QALANQAR KHAN Muhammad Ashraf All Khan Khalif Ur Rehman S. Zakir Hussain Shah M, SULMAN M, AFSAR KHAN Qalandar Khan M,Aslam M YDUSAF	Gps havelain village GpS #2 Aid GMPS Mehal II/CA Dhamtour GPS Masina Kalan Gps magri bala GMKS LUMDI (Batangi De Moberil GPS Dhand Karar GPS Chonale ad GPS Chonale ad GPS Chonale Aid GPS Chonale Aid GPS Chonale Nath GPS BANDA GNAZAN GPS Dheri Sari GPS Chattu De Gall GPS Dakhan Tairr eta	Havellan ATD Sherwan Ohamtour GOI Havellan O/Abad Ohamtour BOI ATD Lors NATHIAGALI G/Abad BOI ATD NATHIAGALI	GPS HaveRan Village GPS B 2 Ard GPS Gohn GPS IICA Dhamtour GPS Mastha Kalan GPS Magd Bata GPS Banda Lamha GPS Ihafar GPS Rivala Stalkot GPS Choona barl GPS Choona barl GPS Banda Ghazan GPS Banda Ghazan GPS Banda Ghazan	Havelan Ald Shervan Dhamlour Bol Havelian C/Abad Dhamlour Bol Ald Lora Nalhla Gail Q/Abad Bol Ald
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116 117 118 119 120 121 122 123 124 125 128 127 128 130 131	1597 1598 1399 1600 1601 1602 1603 1604 1605 1606 1606 1609 1610 1611 1612 1613	N. Saffudin M. Tariq Javed Jahld Mehmood Abdul Rasheed M taeed ABDUL NISAR Muhammad Zahid Abdur Aehman Waqar Khan S. Yarawar Hussain Shah MUHAMMAAO, Hanif SHOAIB ISLAM M. Salcern Imran Khan M ISSHAO M. MUNIB ZAHOOR AHMEO	Sakhawat khan Allauddin Adul Hameed Rehamatuliah khan Noor Ahmad M ashraf QALANQAR KHAN Muhammad Ashraf All Khan Khalif Ur Rehman S. Zakir Hussain Shah M, SULMAN M, AFSAR KHAN Qalandar Khan M,Aslam M YDUSAF	Gps havelain village GpS #2 Aid GMPS Mehal II/CA Dhamtour GPS Masina Kalan Gps magri bala GMKS LUMDI (Batangi De Moberil GPS Dhand Karar GPS Chonale ad GPS Chonale ad GPS Chonale Aid GPS Chonale Aid GPS Chonale Nath GPS BANDA GNAZAN GPS Dheri Sari GPS Chattu De Gall GPS Dakhan Tairr eta	Havellan ATD Sherwan Ohamtour GOI Havellan O/Abad Ohamtour BOI ATD Lors NATHIAGALI G/Abad BOI ATD NATHIAGALI	GPS HaveRan Village GPS II 2 Ard GPS Gohn GPS II CA Dhamtour GPS Mastina Kalan GPS Magd Bata GPS Banda Lamha GPS Rivala Stalkot GPS Choona barl GPS Choona barl GPS Choona barl GPS Banda Ghasan GPS Oheri Sarl GPS Chattu De Gail GPS Dakhan Vatreela GPS Banda Qasil	Havelan Ald Shervan Dhamlour Bol Havelian C/Abad Dhamlour Bol Ald Lora Nathla Gall G/Abad Bol Ald Nathla Gall O/Abad
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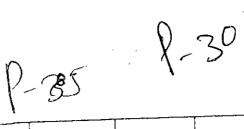
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l	566	2154	Digat Ad	Ghulam Halder	GP3 Chatri Bala	Dhamtour	GPS Patotay	Chambour =
ļ	567	7155	M. Seeed	M. Nist	GPS Kerl Sarafall	NATHIAGALI	GPS Kerl Strales	Nathia Gall Lai a
ļ	568	7156	plank benvinerium	Abdul Wahid	GPS Servian Bagh	Dhamtour	GPS Sarrian Bagh	Dhamlour -
ļ	569	2157	Shalqat Alë	All Aiber	GPS Sangi Malea	AFD	GPS Theryesi	Ald .2
Į	570	2159	Muhammad Shaid Rimian	Muhammad Ramsan Mir	GPS Ohake	Chamtour	GPS Dhoke	Ohemlour

Terms and conditions:-

- 01. They would be on probation for a Period of One Year extendable for another one year.
- 02. They be governed by such rules and regulations as may be issued from time to time by Govt.
- 03. Their Services can be Irmenatied at any time, in case his performance is found unsatisfactory. during probationery period. In case of misconduct, he shall be preceded under the rules framed time to time.
- 04. Charge report should be submitted to all concerned.
- 05. Their inter-Se- Senority on the lower post will remain intact.
- 06. No TA/DA is allowed for joning his duty.
- 07. They will give an under taking to be recorded in their Service Books to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reversed.

Muhammad Rlaz Khan Swati District Education Officer(M) Abbottabad

Endst No /5/1-18

Promotion for PST BPS-12 TO Senior PST BPS-14 Dated ATD that

Copy forwarded for information and necessary action to the:-

01. Dirictor Elementary & Secondry Education Khyber Pakhtunkhawa Peshawar.

02. PS To Secretary to Govt Khyber Pakhlunkhwa E&SE Department.

03. Dy:District Education Officer(M) Abbottabad.

.04. Sub: Div: Education Officer(M) Abbottabad.

.05. All ADOs Circles.

.06. District Accounts Officer Abbottabad.

.07. B&AO Local Office,

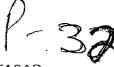
.08. All concerned.

.09. Office File.

STATIONERY, PHOTOSTATE & SPORTS Near Boy College Link Road Abbottabad 341007, 0333-5022422

Dy: District Education Officer(M) Appottabad

2 Value Palaceut to



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

Consequent upon recommendation of the Departmental Promotion Committee and in pursuance of Government of Khyber-Pakhtunkhawa Elementary & Secondary Education Department Notification No SO/(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endst No.SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following (208) Male PST BPS 12 are hereby promoted to the post of SPST BPS-14 (12720-980-42120) plus usual allowances as admissible under the rules on the regular basis under the existing recruitment policy of the Provincial Govt: Notified vide No SO(PE)14-5/SSRC/Meeting/2012/teaching cadre dated 13.11.2012 on the terms and conditions given bellow and hereby further posted in the Schools noted against their names with immediate effects.

S. No	Sen No	Name of Teacher	Name Of Schools	Place of posting	Remarks
1.	.(59)	Muhammad Rawail	GPS Mukdabi	GPS Mukdabi	Promoted and posted as SPST at the same duty station
2.	62	Shafiq-ur-Rehman	GPS Chaher	GPS Chaher	-do-
3.	75	Javeed Akhtar	GPS Dakhan Paisar	GPS Dakhan Paisar	-qo-
4.	.107	Múhammad Saddique	GPS Thesi	GPS Thesi	-do-
5.	134	Khalid H Shah	GPS Cowata	GPS Dawata	-do-
6.	156	Karimdad	GPS Keri Kalanda	GPS Keri Kalanda	-do-
. 7.	159	Qazi Zahid hussain	GPS Hurnara	GPS Hurnara	-do-
8.	204	Muhammad SADIQUE	GPS Narian	GPS Narian	-do-
9.	208	.Rasheed Khan	GPS Bogram	GPS Bogran	-do-
10.	225	Muhammad AZAM	GPS Tatial	GPS Tatial	-doے
11.	226	Muhammad Shabeer	GPS Lahoor	GPS Lahoor	vido-
12.	229	SARWAR KHAN	GPS Sumandar khata	GPS Sumandar A	161v
13.	235	Abdul Rasheed	GPS Kutwai	GPS Kutwal	/-do-/
14.	240	Aurangzeb	GP5 Nakka	GPS Nakka	/ -do-
15.	248	Rab Nawaz	GPS Seri Sher Shah	GPS Seri Sher Shah	/ -do-
. 16.	258	Muneer Ahmed	GPS Kuthwal	GPS Kuthwal	-do
17.	262	Muhammad Javed	GPS Thathi Ahmed	GPS Thathi Ahmed	-do-
		ivitinam:tiad Javed	Khan ·	Khan	(
18.	266	Shukat Hussain	GPS Kolalian	GPS Kolalian	-do-
19.	282	Fazle Razaq	GPS Maira Khurd	GPS Maira Khurd	-do-
20.	304	Safdar Khan	GPS Karhakki	GPS Karhakki	-do-
21.	(329)	MUHAMMAD TAREQ	GPS Chammad	GPS Chammad	-do-
22.	331	Muhammad Arif	GPS Seri Bandi Sarara	GPS Seri Bandi Sarara	-do-

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	2	3. 3	43	Muhammad Sha	rif	GPS Mohri Mair	 a	GPS Mohri Maira	ا	حور کے -do-	
	<u> </u>	4. 3	56	Muhammad		GPS Thermutian		GPS Thermutian		-do-	-
4	2:	5. 3	66	Asghar GOHAR REHMA		· · · · · · · · · · · · · · · · · · ·	· 			·	
	.26		84	Aurangzeb		GPS SAJIKOT		GPS SAJIKOT	·].	-do-	
-	2		09	Mir Afzal		GPS Dhand Khait		GPS Dhand Khaita	ir 🕆	-do-	_
	28		12	· · · · · · · · · · · · · · · · · · ·	·	GPS Hill Sialkot		GPS Hill Sialkot	· :	-do-	_
	29	. 1	12 14	SAKHAWAT SHAF		GPS Garlanian	· · ·	GPS Garlanian		-do-	-
	30		15	Muliammad Asla	m	GPS Bagh Dara		GPS Bagh Dara		-do-	
		, <u>4</u>	10	Nazar Hussain		GPS Tharatti		GPS Tharatti	-	-do-	
	31	4	26			GPS Kalsi NagriBALA		GPS Kalsi		-do-	-
	32	. 43	· 21					NagriBALA			
				Nusrat Iqbal		GPS Banwari	_ .	GPS Banwari		-do-	-
i	33	43	37	Muhammad Sarfraz		GPS Karakki		GPS Karakki		-do-	~
	34	45	9.	Audul Manan							
	35			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		GPS Hav: Vill:		GPS Hav: Vill:		-do-	
Ì	/ 36	·		Shakeel Ahmed	4	GPS Jhansa		GPS Jhansa		-do-	_
- 1	37	<u> </u>		Shabeer Ahmed	4	GPS Missar		GPS Missar		-do-	_
f	38.	_ 1 '-		Rehan Ahmed		GPS Nammal		GPS Nammal		-do-	_
1				Muhammad		GPS #2 Mirpur GPS Goreeni		3PS #2 Mirpur		-do-	
	39.	50	0	Zaheer	-			GP5 Goreeni		-do-	_
	40	 		ABDUL HAMEEI:				The service of the se			
	40.	514	* I	KHAN		GPS Nika Pani		GPS Nika Pani		-do-	_
	41.	553		Abdul Rasheed	+,	GPS Upper B/Gali			 		_
	42.	623		Muhammad Arif	+	GPS Nakka	1.	SPS Upper B/Gali	<u> </u>	-(do-	
	43.	631	- 1	Binyamin		GPS Sumandar		PS Nakka	-	<u>-do-</u>	_
-								GPS Sumandar		1)-90-11.1-	
	44.	638	1	Muhammad	7			//	4-6	1/ (01)	1
			_ _	NAZIR		GPS Kalakote		GPS Kalakote		/-do-	
	45.	647		Bul Faraz Mir	C	SPS Muslimabad	G	PS Muslimabad	·	-do-	1
<u> </u>	46.	654		VARIS KHAN	G	PS MORE KALAN		PS MORE KALAN	/	-do-	l
 	47.	657	_ E	jaz Hussain		PS Darwaza		PS Darwaza	 -/-	-do-	1
	48.	659	10	lamar Hussain	G	PS Khanspur		PS Khanspur			ĺ
_		- · · ·	┷.	_ 		yubia		rubia '		-do-	
	49.	662		luhammad	6	C.D.C. III		GPS Kutli Phulkote		-do-	
-			¬/—~	afdar						-uo- 	
	50.	667		luşhtaq Ahmed	G	PS Missar	GP	S Missar		-do-	
-	51.	<u>6</u> 69		aheed Akhtar	GI	PS Hairlan	!	S Hairlan		i	
	52.	680		Muhammad		CDC CL		GPS Chatry		-do-	
					ان					-do-	
53. 54. 55.		686		LFIQAR H. SHAH	GP	S Rian da Maira	GPS	Rian da Maira			
		769	M	uhammad Haqiq		DC No. 144		GPS Nari Hoter		-do-	
		770	Sye	d Abid hussain Shah				Muslim Town		-do-	
						<u>i</u> _		··· Gotti (OWI)		-do-	

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				P-34	1
56	5. 78	6 Qadeer Ahmad	GPS Chah Batang	i GPS Chah Batangi	-do- 19
(57	78	Muhammad V	GPS Talehar	GPS Talehar	-do-
58	80	Muhammad Sheraz	GPS Basala	GPS Basala	-do-
59	·	SHAMIRAIZ	GPS Badhair	GPS Badhair	-do-
60			GPS Birote	GPS Birote	40
61		add Dacet	d GPS Chak	GPS Chak	-do-
62			GPS Snaja	GPS Snaja	-do-
63	849	Muhammad Rafiq	GPS Phulan Wali	GPS Phulan Wali	-do-
64	. 868	ARSHAD KHAN	GPS Sumandar khata	GPS Sumandar khata	-do-
65		Muhammad Farooq	GPS Tarkot	GPS Tarkot	-do-
66		Muhammad Riaz	GPS Chattri	GPS Chattri	
67.		Aurangzeb	GPS Maltol Payeen		-do-
68.	1008	Mubarak Ali	GPS Gallah Birote	GPS Gallah Birote	-do-
69.		Nazar Muhammad	GPS Hill Karmatti	GPS Hill Karmatti	-do-
70.	1070		GPS Chatri Bala	GPS Chatri Bala	-do-
71.	1075		GPS Malikpura		-do-
72.	1079		GPS TARHANA	GPS Malikpura	-do-
73.	1082	Gul Khatab	GPS Dana Bagan	GPS TARHANA	(-do-
74.	1083	MUHAMMAD		GPS Dana Bagan	Ado-
75.	1083	KHURSHED	GPS Kala Bagh	GPS Kala Bagh	100-100-
76.	1099		GPS Rata Bagla	GPS Rata Bagla	/-do-/
		GHULAM	GPS Samwala	GPS Samwala	/ -do-
77. ———	1100	MUSTAFA .	GPS Tatreela	GPS Tatreela	-do-
78. 	1110	Muhammad Manwar	GPS Kasala .	GPS Kasala	-do-
79.	1113	QAZI MUHAMMAD SAJID	GPS BAND! Dhundan	GPS Chattian	Promated & posted against the vacant post of SPST
80.	1128	Muhammad Javeed	GPS Sherwan	GPS Sherwan	Promoted and posted as SPST at the same duty
81.	1131	Muhammad Iqbal	GPS No. 04 Atd	GPS No. 04 Atd	station
82.	1132	Muhammad			-do-
83.	<i>:</i>	Naseem	GPS Sando Gali	GPS Sando Gali	-do-
	1174	Azhar Masood	GPS Hill Sialkot	GPS Hill Sialkot	-do-
84.	1186	Syed Ghulam Dastager Shah	GPS Upper Kunj	GPS Upper Kunj	-do-
85.		Abdur Razzaq	CDC CI	GPS Dhara Birote	
-	• .			9101Id Pilard Eloife	-do-

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	•			P. 40	S
	, -	; ,	CDC Maroles	GPS Naroka	-do-
86.	1232	Muhammad Arif	GPS Naroka		-do-
87.	1235	Safdar Hussain shah	GPS Gallah Birote	GPS Gallah Birote	
- 88.	1241	Abdul Latif	GPS Mian de Seri	GPS Mian de Seri	-do-
89.	1245	Abdul Sattar	GPS Develi Bandi	GPS Develi Bandi	-de-
90	(1246)	Ghulam Mujtaba Shali	GPS PASWAL MIAN	GPS PASWAL MIAN	-do-
91.	1260	Qamar Nacem	GPS Ateran	GPS Ateran	-do-
92.	1270	Muhammad Riaz	GPS PIR KOT	GPS PIR KOT	-do-
93.	1271	Masood ur Rehman	GPS Tatial Batangi	GPS Tatial Batangi	-do-
94.	-1274	Muhammad Zahid	GPS Dhamtour	GPS Dhamtour	-do-
95.	1285	Muhammad Khurshed	GPS Jaster	GPS Jaster	-do-
96.	1305	Khan Afsar	GPS Mohri Bed	GPS Mohri Bed	-do-
90.	1202		Dhen	Dhen	<u></u>
97.	1307	ZAHEER -UD -DIN	GPS BADHAIR	GPS BADHAIR	-do-
98.	1309	GUL ZAREEN	GPS Bandi Maira	GPS Bandi Maira	-do- -do-
99.	.1312	Nazar Muhammad	GPS Kasala	GPS Kasala	-do-
100.	1316	Muhammad BASHIR	GPS Tatial Batangi	GPS Tatial Batangi	
101.	:1318	SARFRAZ KHAN	GPS DakanTatreela	GPS DakanTatreela	do-
102.	1320	Banaras Khan	GPS Toheed Abad	GPS Toheed Abad	-do-
103.	1323	GUL ZAREEN	GPS DAKHAN . BAGAN	GPS DAKHAN BAGAN	16/2
104.	1334	Mujeeb-ur- Rahman Abbasi	GPS Kotli	GPS Kotli	/ -do- /
105.	1340	Manzoor Ahmed	GPS Maira Kumhoran	GPS Maira Kumhoran	: / -do- . /
106.	1345	Muhammad Tariq Abbasi	GPS Batangi	GPS No 3 Atd	Promated & posted against the vacant post of SPST
107.	1352	CHANZAB	GPS Kasala	GPS Kasala	Promoted and posted as SPST at the same duty station.
108.	1357	Muhammad Ibrahim	GPS Kukmong	GPS Kukmong	do-
109.	1371	Nehmat Ali	GPS Usma Dheri	GPS Usma Dheri	-do-
110.	1374	Mühammad Tariq	GPS #1 Nawan Shehr	GPS #1 Nawan Shehr	-do-
111.	1379	Zakir Hussain	GPS Danna Bagan	GPS Danna Bagan	-do-
112.	1386	Muhammad Sharif	GPS Salol Bandi	GPS Salol Bandi	-do~
113.	1393	Ageel Ahmad	GPS Taroor	GPS Taroor	-do-

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				•	V- 6h	
			. V .			Promated & posted
7	114.	1399	Muhammad Asif	GPS Banda Nabi	GPS Shaikhul Bandì	against the vacant post of SPST
· ·	115.	1403	MAZHAR HUSSAÍN	GPS Cnattar Nath	GPS Chattar Nath	Promoted and posted as SPST at the same duty station
 	116	1405	MUHAMMAD.	GPS Toheed Abad	GPS Toheed Abad	-do-
-	117.	1413	Abdul Waheed	GPS Toheed Abad	GPS Toheed Abad	-do-
\vdash	118.	1418	Saif-ur-Rehman	GPS Usma Dheri	GPS Usma Dheri	-do-
\vdash	119.	1442	Zia ur rehman	GPS No 1 Hvn	GPS No 1 Hvn	-do-
-	120.	1472	Amjid Hussain	GPS Birote	GPS Birote	-do-
-	121.	1477	MUHAMMAD ILYAS	GPS Sajikote	GPS Sajikote	-do-
}		- 	Muhammad	GPS Kanthialy	GPS Kanthialy	-do-
	122.	1482	Banaris	Upper	Upper	
-	123.	1494	Ghulam Mustafa	GPS Bagla-3	GPS Bagla-3	-do-
\vdash	124.	1497	Zahoor Ahmed	Gps phulanwali	Gps phulanwali	-do-
-	125.	1502	M. Nazir	Chariali .	Chariali	-do-
\vdash	126.	1519	Mir Baz khan	: GPS Nalotha	GPS Nalotha	-do-
	127.		Rasheed Khan	GPS Hadora Bandi	GPS Bagla No 1	Promated & posted against the vacant post of SPST Promoted and
	128.	1533	Tariq Aziz	GPS Bandi Pahar	GPS Bandi Pahar	posted as SPST at the same duty
F	129.	1535	Gui-Faraz	GPS Dunian	GPS Dunian	Zdo-
-	129.	1333	Guirialaz	GPS Dana Khan	GPS Dana Khan	w/)-do-
	130.	1540	RASHEED AHMAD	Kalan	Kalan 🕜	1////
-	131.	1542	Muhammad Jahangir	GPS Toneed Abad	GPS Toheed Abad	/-do-/
	132.	. 1560	Muhmmad Faroog	GPS Payain	GPS Payain	-do-
	133.	. 1561	Muhammad TARIQ ABBASI	GPS Jab Kari	GPS Jab Kari	-do-
	134	. 1563	Naveed Anwar Qureshi	GPS Baseera	GPS Baseera	-do-
	135	1567	Aftab Hussain Shah	GPS Dheri	GPS Dheri	-do-
	136	. 1569	Tahir Mehmood	GPS Langaloot	GPS Langaloot	-do-
İ	137	. 1587	Gulkhatab	GPS Jogimar	GPS Jogimar	-do
1	138	. 1617	Sajid Hussain Shah		GPS Patta Doga	-do-
1	139	. 1620		GPS Sathal	GPS Sathal	-do-
İ	140	. 1630	Nadeem Tahir	GPS No. 01 Hav:	GPS No. 01 Hav:	-do-
-	141	1637	Abdul Razaq	GPS Lakhala	GPS Lakhala	-do-

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			\$*		1-9	III.
Ì	142.	1639	Abdul Qadoos	i GPS Bai Jandran	GPS Bai Jandran	-do-
				GMPS MassahS	GMPS MassahS	-do-
	143.	1641	Abdul Qadoos	Saydan	Saydan .	
	144.	1657	Muhammad Riafat	GPS Kothera	GPS Kothera	-do-
	145	1679	Muhammad ARIF	GPS Kasala	GPS Kasala	-do-"
	146.	1704	Arshad khan	Gps kalu mera 🕟	Gps kalu mera	
, <u> </u>	1:47:	1733	ALI ASGHAR	GPS Kari Asrafli	GPS Kari Asrafli	-00-
	148.	1739	Tassadaq Hussain	GPS Nalbeer	GPS Banda Dalazak	Promated & posted against the vacant post of SPST
	149.	1747	Asif Aziz	GPS Malikpura	GPS Malikpura	Promoted and posted as SPST at the same duty station
	150.	1768	Muhammad Pervez	GPS Haryala	GPS Haryala	-do-
	151.	1774	Niaz Muhammad	GPS Lower Biran Gali	GPS Lower Biran Gali	-do-
ير	/ 152.	(1790)	WASEEM ANWAR	GPS Biga Kote	GPS Biga Kote	-do-
	153.	1804	ABDUR RASHEED	GPS Suranda	GPS Toheed Abad	Promated & posted against the vacant post of SPST
	154.	1809	Tahir mehmood .khan	GPS Majhat	GPS Majhat	Promoted and posted as SPST at the same duty station
	155.	1810	FIAZ HUSSAIN SHAH	GPS JABBRI	GPS JABBRI	-90
<u>.</u>	156.	1817	Muhammad Asif	GPS Barbeen	GPS Barbeen	//-dp-,,
`	157.	1824	Dildar Hussain	GPS Payyian	GPS Payyian //'	V-do-10/7,
<u> </u>	158.	(1840)	Sajjad Khan	GMPS Gojar Moar	GMPS Gojar Moar	/do-
ļ	. 159.	1864	ABID HUSSAIN	GPS Chabrian	GPS Chabrian	/ -do-
	160.	1897	Rasheed Ahmed	GPS Bari Bagla	GPS Bari Bagla	/ -do-
-	161.	1898	Niaz mohmmad	Gps Dhula Bandi	Gps Dhula Bandi	/ -do-
	162. 163.	1924	Yasir Muhammäd Azkar	GPS Hotrarrai	GPS Hotrarrai	/ -do-
	164.	1986	Muhammad Nadeeni	GPS Bandi Birote GPS Leeran	GPS Bandi Birote GPS Kurli	Promated & posted against the vacant post of \$P\$1
	165.	2001	Muhammad Shamraiz	GPS Kohalian	GPS Kohalian	Promoted and posted as SPST at the same duty station
	166.	2004	Muhammad Mushtaq	GMPS Kot Gali	GMPS Kot Gali	-do-
	167.	2015	Muhammac Mushtaq -	GPS CHATTRI	GPS CHATTRI	-do-
	168.	2018	Sher Baz	GPS Maira Hasnal	GPS Maira Hasnal	-do-
<u> </u>	169.	2027	Najeeb-ur-Rehman	GP5 Lohoor	GPS Lohoor	-d o -
	170.	2029	Muhammad Zaheer	GPS Takhar	GPS Takhar	-do-

Office Bar Monabad

						•				
			GPS Garmal		GPS Garmal		-do-			
La Colombia		GPS Jansa	_	GPS Jansa		-do-				
	<u>-173</u>	. 20	93	Maraj Muhamma	ad :	GES Dhaira		GPS Dhaira	1 .	-do-
*	174	.21	12	Irshad Ahmed		GPS Kalsi		GPS Kalsi		-do
	175		[<u></u>	· 	NagriBALA	٠.	NagriBALA	-	
	176			Muhammad Spar	is	GPS Julial		GPS Julial		-de-
		1		Amjid Hussain		GPS Narrian		GPS Narrian		-do-
	177		. 1	Muhammad Fiaz	- ~-	GPS Sangra Batangi		GPS Sangra Batan	gi	-do-
<u> </u>	178. 179.			Iftekhar Ahmad		GPS Baganian	_	GPS Baganian		-do-
	180.			Syed Barkat Ali	· 	GPS Thatti Sharif	V	GPS Thatti Sharif		do-
ļ	100.	216	4	Khalid-Mehmood	:	GPS Karraki	_	GPS Karraki		-do-
	181.			Saghir Ahmed		GPS Khaira Gali Bazar		GPS Khaira Gali Baza	ar	-do-
	182.			Hamid-ul-Wakeel		GPS Choona		GPS Choona	十	-do-
1	183.	216		Saced Nawaz		GPS Chaan		GPS Chaan	\dashv	-do-
	<u> 184.</u>	·	_	Mushtaq Ahmed	ļ	GPS No.03 Hav		GPS No.03 Hav		-do-
<u> </u>	185.	216	_	Ahsanidlah		GPS Darkan	7	GPS Darkan	-	-do-
}	186.	2168	. .	Muhammad Zaheer		GPS Lassan		GPS Lassan	\dagger	-do
·	187.	2170		Muhammad Iqbal	7	GPS Pulhair Bandi		GPS Pulhair Bandi	- -	
1	188.	.2171	. <i>F</i>	\sif iqbal		GPS Ander Sari		GPS Ander Sari	1	1 / do /
1	89.	2172	Α	bdui Haseeb	1	GPS Upper Karachh		GPS Upper Karachh		-do- /13
Ĺ		2173		luhammad rshad	T	GMPS Sultanabad	+	GMPS Sultanabad	+-	/-do-
		2174	G	hazanfar Habib	(SPS Lower Bakote				
19	92.	2175	N	luhammad Sabir		SPS Choora Gali		GPS Lower Bakote	↓_	/ -do-
		2176	√ [\right\]	luhammad Iqbal ¿ nan .		iPS Bandi Phullan	. [SPS Choora Gali SPS Bandi Phullan		-do- -do-
19	94.	2178		ijad Ahmed Khan	G	PS Toathi Ahmed			1_	
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2189	Saif-ur-Rehman	GPS Jabbi	GPS Jabbi	-do-
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2192	Muhdammad Shakeel	GPS Moolia	<u> </u>	-do-
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Terms & Conditions:

- They will be on probation for a period of one year extendable for another one year 2.
- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be preceded under the rules framed from time to time. Charge report shall be submitted to all concerned.
- Their inter-seniority on lower post will remain intact.
- No. TA/DA is allowed for joining their duty.
- They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if they are wrongly promoted, they will be reversed.
- 8. Their promotion is subject to the condition that their certificates/documents must be verified from the concerned authorities by the DDO concerned, anyone found producing bogus/fake Certificates will be reported to the law enforcing agencies for further action.

	sol/
39-40	DISTRICT EDUCATION OFFICER (M) ABBOTTABAD
EB-II/Promotion PST to Sper	

Copy forwarded to the:

Director Elementary & Secondary Education Knyber Pakhtunkhwa Peshawar. 1. District Accounts Officer Abbottabad.

2.

Sub Divisional Education Officer (Male) Abbottabad.

Sub Divisional Education Officer (Male) Have lan

5. P/S to Secretary E& SED Peshawar.

6. AP EMIS branch, local office.

Teachers concerned.

DISTRICT POUCATION OFFICER (M)

Advoc

Office

EDUCATION OFFICER

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification issued vide No.SO (B&A)/1-18/E&SE/2012 dated 11.7.2012 & Finance Department Endst: No.SO(FR)/FD/10-22(E)/2010 dated 16.7.2012 & No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Gadre dated 13.11.2012, the following Primary School Teachers are hereby promoted to the post of PSHT BPS-15 (Rs.16120-1330-56020) plus usual allowances as admissible under the rules on regular basis on the terms & conditions given below and are hereby adjusted at the stations noted against their names with



	Sr #	PST Sen:#	Name of Teacher	Present School	Place of posting	Remarks
Į	1.	1790	Waseem Anwar SPST	GPS Biga Kote	GPS No.2 Havelian	Ag: vacant post

Terms & Conditions:

- i. On his promotion, the teacher concerned will be on probation for a period of one year in terms of section-6(2) of Khyber Pakhtunkhwa Civil Servant Act 1973 read with rule 15(1) of Civil Servant (Appointment, Promotion & Transfer) Rules 1989.
- He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- His services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules from time to time.

His inter-Se-Seniority on lower post will remain intact.

- 5. He will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
- He should join their post within 15 days of the issuance of this notification. In case of failure to join their posts within 15 days of the issuance of this notification, their promotion will expire automatically and no subsequent appeals will be entertained.
- Necessary entry should be recorded in their original service books.

Charge report should be submitted immediately to all concerned.

- Checking of verification of all the documents shall be ensured by the DDO concerned.
- 10. No. TA/DA is allowed.

QAZI TAJAMAL HUSSAIN DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

Endst: No. 11433-25 _/Prom_SPST to PSHT

Dated, 19-10 /2017

Copy forwarded to the:

- PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar. 1.
- Director E&SED Khyber Pakhtunkhwa Peshawar.

District Accounts Officer Abbottabad.

- Sub Divisional Education Officer (M) Havelian
- Sub Divisional Education Officer (M) Abbottabad.

Officials concerned.

M/File.

DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

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NOTIFICATION.

Consequent upon recommend Committee & in pursuance to the Govt: of Khy

the Departmental Promotion Education Department Notification issued yield No. SO (B&A)1-18/E&SE/2012 dated 11-07-2012 and Finance Department Eriest: No. SO (FR)/FD/10-22(E)/2010 dated 16-07-2012, whereby the following (51) SFST (BPS-14) (M) are hereby promoted to the post of PSHT in BPS-15 (10985-905-38135) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Government in teaching the rules on regular basis under the existing policy of Provincial Government in teaching cadre on the terms and conditions given below and further posted as recorded against

F				-	as recorded against
S.No.	SI: No	Name of Teacher	Present School-	! ! !	<u>, , , , , , , , , , , , , , , , , , , </u>
· · · ·	2	3	1 4	Place of Posting	Remarks
1	1457	Muhd Parvez	GPS f	CDC D	in the second se
2	1500		Maira Mooiia.	. GPS Dakhan Khan Kalan.	Promoted & Posted against vacant post of PSHT.
3		Abdul Hanaan Muhammad	Upper Kurj.	GPS Leeran.	Promoted & Posted against vacant post of PSHT.
	1570	lltaf	GPS Kalal Kote	GPS Maira Passal.	Promoted & Posted against vacant post of PSHT.
4	1666	Khuda Dad Abbasi	GPS Atera 1	GPS Ropper.	Promoted & Posted against vacant post of PSHT.
5	1667	Muhd Arif	GPS Langaloot.	GPS	Promoted & Posted against
6	1669	M. Riasat	GPS Chamhad	Suma Karaga. GPS Kotehra.	vacant post of PSHT. Promoted & Posted against
<i>;</i>	1671	Muhammad Zaheer	GPS Gali Kuthwal.	GPS Banj	Promoted & Posted against
88	1673	M. Azeem	GPS Dhani	Beeran Gali GPS Tarkote.	vacant post of PSHT. Promoted & Posted against
9	1674	Zalpoor Ahmed	GPS.	GPS Kangrora.	Promoted & Posted against
i Li	1676	Rashid Risz	Shaheedabad GPS Dera	CPS	Promoted & Posted against
1.1	1680	Muhammad	GPS Chaniba	Seri Bagnotar.	Promoted & Posted against
1.5	16.00	Ashfaq	GPS Changba	GPS Chanjah.	vacant post of PSHT.
··	1682	Nisar Ahmed	Halmaira Zarin	GPS Tootni	Promoted as PSHT & adjusted on Medical Grounds.
. 13	1686	Muhammad Fayazı	GPS Paswal \ Mian.	GPS Pata Doga.	Promoted & Posted against vacant post of PSHT.
<u>J</u> -1	1687	Abid hussian shah	GPS Batolani	GPS Katha.	Promoted & Posted against vacant post of PSHT.
15	1688	Muhammad Nazir	GPS Akhora Bala	GPS Main Pak	Promoted & Posted against vacant post of PSHT.
10	1689	Fata khan	GPS Jander Bari	Maira Rehmal. GPS Kasorrian.	Promoted & Posted against vacant post of PSHT.
17	1703	M. Iqbal	GPS Gali Meeren	GPS Dawatta.	Promoted & Posted against vacant post of PSHT.
	1705	Ashfaq Ahmad	GPS Chambad	GPS Mian Seer.	Promoted & Posted against
···	1709	Muhammad Shabeer	GPS MAIRA RAHAMAT LHAN	GPS Kobalian.	vacant post of PSET. Promoted & Posted against vacant post of PSET.
	1711	Muhammad Haroon	GPS Chora Cali	GPS Kukmong.	Promoted & Posted against vacant post of PSHT.
21	1712	Muhammad Javeed	GPS Akhreeia No. 2	GPS Bagh.	Promoted & Fosted against vacant post of PSHT.
22	1715	Shakeel Anwar	GPS Golage	GPS Donga Gali.	Promoted & Posted against vacant post of PSHT.
23	1718	M. Farid	GPS Bandi Pahar.	GPS Bandi Pahar.	Promoted as PSHT & Posted against the vacant
24	1719	Shoukat Hussian	GPS Mallah	GPS Tarala Bagla,	post at same duty/station. Promoted & Poster against vacant post of PSFT.
25,	1722	Ghulam Fareed.	GPS Jab Kcri	GPS Moh: Ghilani Pirkote.	Promoted & Posts against
26	1723	M. Zareen	GPS Chariali	GPS	Promoted & P
27	1724		GPS	Nara Nammal. GPS Narian Chair	Promped '
28	1728	آ بن	GPS Gali Kuthwai	Narian Ghair. GPS Dakhan Bagan.	Promoted & vacant pos

Court of Pakistan Office # 33 Jinnah Plaza Adjacetico

Distt: Bar Abbottabad

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			D-43	aro ocu.	vacant post o (", ')
30	1731	Muhd Zahoor	GPS Dana Majan Kalan	GPS Ramkote.	Promoted & Pisted against vacant post o PUTT.
31	-1732	Obaid ur Rehman	GPS New ri Lower.	GPS Kund Battal	Promoted & Forted against vacant post of PSITI
32	1734	Muhammad Amin	GPS Kangar Payeen	GPS Bissan.	Promoted & Posted against vacant post of PSHT.
33	1738	Tahir Zareen	GPS Mescol Payeen	GPS Kanger Hoter.	Promoted & Losted against vacant post of PSHT
34	1743	Arshad Mehmood	GTS Bandi-Maira.	GPS Maddar.	Promoted & Fosted against vacant post of PSIT.
35	1745	Ejaz	GPS Palakian	GPS Deghan.	Promoted & Fosted against vacant post o PSUL.
36	1748	Shafiq ur Rehman	GPS Kalsi Orgri Bala	GPS Longal.	Promoted & Posted against vacant post o PSHT.
37	1749	Ishtiaq Hussain	GPS Jander Bari	GPS Pangora.	Promoted & Posted against vacant post of PSHT
38	1751	Najam-ul-Farooq	GPS Hyryat	GPS Hillan Sagana.	Promoted & Posted agmost vacant post of PSHT
	*4 2 58	A CONTRACTOR OF THE PARTY OF TH	Liver V.Majwal	GPS Khan Malkote.	Promoted & Posted against vacant post of PSRP.
40	1759	M. Kaiz	GFS Tiana Khurd	GPS Taroor.	Promoted & Pasted against vacant post of PSHT
41	1760	Abdur Rashid	GPS Nigri Payeen	GPS Ghora.	Promoted & Posted against vacant post of PSHT. 1
42	1761	Atiq ur Rehman	GFS 1 ryala	GPS Baswer.	Promoted & Posted against vacant post of PSID
43	1763 -	Shams-ul-Arfin	GFS 1. eran Sydian	GPS Dawaza.	Promoted & Pasted against vacant post of PSHT
-i 4	1764	Abdul Nacem	GPS Kathiala	GPS Dheri Rakhala,	Promoted & Posted agency vacant post of PSHT
(15) \	1776	Niaz	GPS U Tarhawa Mistreen	GPS Dherian Rahi.	Promoted & Posted against vacant post of PSH4
46	1778	Manzoor Haider	GPS Upper Karach	GPS Thakriala.	Promoted & Pested aparest vacant post of 1991)
47	1783	Mazher Khan	GPS Sqeikhul Bandi.	GPS Dakhi Khater.	Troinoted as AIT & adjusted on M. dirid. Grounds.
48	1788	Khaild Hussian Shah	GPS Wizeeran.	GPS Kehari	Promoted & Pested against vacant post of PSET
49	1791	Saqib Khau	GPS Binda Lamba.	GPS Chankot.	Projucted & Pested against vagant post of PSH1.
50	1792	Farasat Khan	GPS#; Mirpur	GPS Saddah.	Vacant post of PigiT
51	1793	Raza ul Mustafa Shah	GPS Goharz Baz Garan	GPS Chabgran.	Promoted & Pested ognustive vecant post of PSD4

TERMS AND CONDITIONS.

They would be on probation for a period of one year extendable for another one year.

The will be governed by such rules and regulations as may be issued from time to time by the Govt:

Their services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from 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 their duty.

7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if they are wrongly promoted they will be reversed.

> DISTRICT EDUCATION OFFICER (M) ABBOTTABAD.

Endst: No. 4440 / AE-II/Promotion SPST/PSHT.

Copy for information to;-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

2. District Accounts Officer Abbottabad.

3. PS to Secretary to Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar.

4. Sub Divisional Education Office: (M) Abbottabad.

5. Assistant Programmer EMIS Branch local office

6. PSHTs of the concerned schools. Teachers concerned.

> DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

Office # 12 Jinnah Plaza Adjacent to Disti Bar 11 hottabad

Amex-F

P-48

BEFORE THE SERVICE TRIBUNAL KHYE KHWA PESHAWAR

HTUN

Annex

Waseem Anwar S/O Mohammad Anwar Javed Primary School Head Teacher (PSHT) Government Primary School #2 Abbottabad

... APPELLANT

VERSUS

P-46

I Government of Khyber Pukhtun Khwa through Secretary Education Khyber Pukhtun Khwa Peshawar.

2 Director of Education E & SE, KPK, Peshawar.

3 District Education Officer (M) Abbottabad.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974
AGAINST THE ORDER/ ISSUED BY RESPONDENT # 3 VIDE
OFFICE ENDST # 6627/ PROMO PST To SPST DATED 1/6/2017
AND THE ORDER OF RESPONDENT # 2 WHEREBY THE APPEAL
OF THE APPELLANT WAS NOT CONSIDERED AS AGAINST HIS
ORIGINAL SENIORITY THAT ACTION IS ILLEGAL, VOID
WITHOUT LAWFUL AUTHORITY, WITHOUT JURISDICTION AND
SAME IS NOT TENABLE IN THE EYES OF LAW AND IS LIABLE
TO BE SET ASIDE.

PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL THE ORDER OF RESPONDENTS NO 2 & 3 MAY KINDLY BE SET ASIDE AND RESPONDENTS DIRECTED THAT THE APPELLLANT BE PROMOTED ACCORDING TO THE OFFICE ORDER / PROMOTION ORDERS OF THE TEACHERS ISSUED VIDE LETTER # 1511; 18 DATED 28/2/2013 IN ORDER TO MEET THE ENDS OF JUSTICE.

Respectfully Sheweth; -

The facts giving rise to the instant appeal are arrayed as under.

FACTS:-

1. That the appellant is serving as Primary School Head

Thather in Education Department Abbottabad

That during the year 2012, when the appellant was serving as

School Teacher, due to alleged involvement in a

Office I Just a region was suspended from service. Copies of the FIRs

Olett: Barshette Bad

Office A 23 Jinnan Plaza Adjacent of

Disti 851 Abbottabad

and the order of suspension are attached as annexure "A "B" and" C".

- That after the trial of the cases before the court of Competent jurisdiction, on 22/2/2016, the appellant was acquitted of the charges leveled vide FIRs, therefore he was reinstated in service by Respondent # 3 vide office letter #3315 dated 29/. 4/ 2016 and date of reinstatement was clarified to be read as 16/6/2012. Copy of the judgment of the court and the order of reinstating is annexure "D" & "E".
 - That the Respondent # 3 passed promotion order of the appellant from the post of Senior Primary School Teacher to Primary School Head Teacher vide his office Notification # 11423—25 dated 19/ 10/ 2017 by mentioning him in the seniority list at serial # 1790 but did not consider his reinstatement form the date of suspension and the original seniority when the promotion order was passed. Copy of the promotion order and the Promotion order/ seniority list # 1511- 18 DATED 28/ 2/ 2013 are attached as annexure "F" & "G".
- 5. That the appellant had also moved a representation to the Respondent # 3 which was also not considered it was directed to approach to the higher forum. Copy of order is attached as ahnexure "H".

hat the respondent # 2 also failed to appreciate the real icts and law and without any decision and application of mind again sent the appeal to the respondent # 3 for doing needful. Copy attached as annexure "I"

That feeling aggrieved of the above, the present appeal interalia on the following grounds:-

De stad

GROUNDS:-

- 1. That the order respondents on appeal of the appellant is not in accordance with facts and law is illegal arbitrary, void, without lawful authority, without jurisdiction and hence liable to be set aside and revised order needs to be passed in accordance with the seniority of the appellant as per the office order# 1511-18 Dated 28/2/2013.
- 2. That no importance has been given to the contention of appellant and the true facts were totally ignored by the Respondent # 3 during the course when impugn order on appeal was passed.
- 3. That the appellant was acquitted from the court of law therefore the Respondents were under legal obligation to have promoted the appellant from the date of suspension which has not been considered therefore the impugn order needs to set aside with replacement of the fresh order maintaining the seniority and the back benefits of the appellant.
- 4. That although order of reinstatement in service was passed from the date of suspension yet it was not considered at the time when impugned order was passed on appeal of the appellant.

Andrew No. 19 Majocent Pakistan Dottice No. 19 Majocent Pakistan Dottice No. 19 Majocent Pakistan District Pakistan Maceni to 5. That patently the orders are illegal without lawful authority mala-fidely passed that is not sustainable under the law.

) - 49

6. That there is no other speedy and efficacious remedy available against illegality and atrocity committed by the respondents except getting justice through the present appeal.

7. That further points will be submitted at the time of arguments.

<u>PRAYER</u>

It is therefore most humbly prayed that on acceptance of instant appeal the impugned order of Respondents may be set aside and they be graciously directed to pass fresh order of promotion of the petitioner in accordance with the original seniority of the Petitioner of 2013 and from the date of suspension with all back benefits in order to meet the ends of justice.

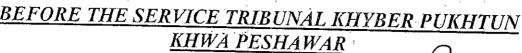
Dated: <u>01/09/2018</u> Abbottabad CS LO DAPPELLANT

a Through

Wocale Algorithms (1) Semi I

(ZÚLFIQAR AHMAD) Advocate High Court

Abbottabad.



Waseem Anwar S/O Mohammad Anwar Javed Primary School Head Teacher (PSHT) Government Primary School #2 Abbottabad.

... APPELLANT

VERSUS

- Government of Khyber Pukhtun Khwa through Secretary Education Khyber Pukhtun Khwa Peshawar.
- 2 Director of Education E & SE, KPK, Peshawar.
- 3 District Education Officer (M) Abbottabad.

SERVICE APPEAL

<u>AFFIDAVIT</u>

I. Waseem Anwar S/O Mohammad, Anwar Javed Primary School Head Teacher (PSHT) Government Primary School #2 Abbottabad. do hereby solemnly affirm and declare on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein. No such appeal is pending in any other court.

Waseem Anwar

...DEPONENT

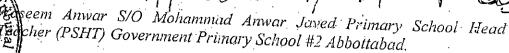
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(ZULEKOAR AHMAD) Advocate High Court Abbottabad

DISTER STATE ABBOTTABLE

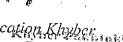
BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUN





. APPELLANT .

Annex.



Government of Khyber Pukhtun Khwa through Secretary Education Khyber, Pukhtun Khwa Peshawar.

Director of Education E & SE, KPK, Peshawar. 2

District Education Officer (M) Abbottabad.

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER/ ISSUED BY RESPONDENT # 3 VIDE OFFICE ENDST # 6627/ PROMO PST To SPST DATED 1/6/2017 AND THE ORDER OF RESPONDENT # 2 WHEREBY THE APPEAL OF THE APPELLANT WAS NOT CONSIDERED AS AGAINST HIS ORIGINAL SENIORITY THAT ACTION IS ILLEGAL, WITHOUT LAWFUL AUTHORITY, WITHOUT JURISDICTION AND SAME IS NOT TENABLE IN THE EYES OF LAW AND IS LIABLE TO BE SET ASIDE.

PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL THE ORDER OF RESPONDENTS NO 2 & 3 MAY KINDLY BE SET ASIDE AND RESPONDENTS DIRECTED THAT THE APPELLLANT BE PROMOTED ACCORDING TO THE OFFICE ORDER / PROMOTION ORDERS OF THE TEACHERS ISSUED VIDE LETTER # 1511- 18 DATED 28/2/2013 IN ORDER TO MEET THE ENDS OF JUSTICE.

Respectfully Sheweth; -

प्रदास्ति-लोक्स

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The facts giving rise to the instant appeal are arrayed as under.

FACTS:-

isc-oubmitted to -day and find.

1. That the appellant is serving as Primary School Head Teacher in Education Department Abbottabad.

2. That during the year 2012, when the appellant was serving as Primary School Teacher, due to alleged involvement in a

murder case was suspended from service, Copies of the

Khyber Pakhtankhwa Service Distanal, peshawar

5.2019

Counsel for the appellant present and requested for adjournment. Adjourned to 18.06.2019 for preliminary hearing before S.B at Camp Court Abbottabad.

> (Muhammad Amin Khan Kundi) Member Camp Court Abbottabad

18.06.2019

Counsel for the appellant present.

Learned counsel for the appellant argued the matter at some length and then stated that the appellant will be presently satisfied in case the respondents decide his departmental appeal, submitted in the year 2018 and forwarded to the Sub Divisional District Education Officer (M) Abbottabad by the Deputy DEO(M) Abbottabad on 08.01.2018.

The stance of appellant appears to be reasonable. The respondents are, therefore, required to decide the departmental appeal within a period of thirty days from the date of receipt of copy of instant order but only in accordance with the law. The appellant, if aggrieved by the decision of his departmental appeal, may approach appropriate forum for redressal in accordance with the law.

The appeal is disposed of accordingly. File be consigned to the record room.

ANNOUNCED

18.06.2019

Certified to be ture copy

Service Triourul.

Posharvar

diacent to

Chairman

Camp court, A/Abad

Form- A FORM OF ORDER SHEET

	Court of	
		59/2019
Case	No	
	-	

	Case No	59/2019
		Order or other proceedings with signature of judge
S.No.	Date of order proceedings	Order or other proceedings was a
1	2	
	и -,	The appeal of Mr. Waseem Anwar received today by post
1-	10/1/2019	All Targets Mr. Zulfigar Ahmad Advocate, may be entered in the institution
		Register and put up to the Worthy Chairman for proper order present
2-	25-1-19	This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on 22-3-19.
		preliminary healing to be party. CHAIRMAN
	22.03.2019	Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on
		24.05.2019 before S.B at Camp Court A/Abad.
		Member Camp Court A/Abad
	- dal	A local
M		Paristante de la companya de la comp
· K	In the state of th	atad

BEFORE THE HON'BLE CHAIRM

PESHAWAR

CM in service appeal No. 1634/19

Waseem Anwar versus Govt of KP, Peshawar

Application for withdrawal of the captioned service appeal with the permission of Hon'ble tribunal to file execution petition as per tribunal order dated 18.06.2019.

Respectfully Sheweth:

- 1. That the captioned service appeal is pending adjudication before this hon'ble tribunal and the date of hearing is fixed for today.
- 2. That after scrutiny of file which revealed that the appellant earlier filed service appeal before this Hon'ble Tribunal which was decided 18.06.2019. Order of the tribunal 18.06.2019 is already available at page 52 of the service appeal. Hence, order of the Hon'ble Tribunal dated 18.06.2019 is vet implemented by the department.

In view of the above, appeal No. 1634/19 of the appellant may be ordered to be withdrawn with the permission to file execution petition in the light of order 18.06.2019 before this Hon'ble Tribunal.

ppellant/ Applicant

Diett Bar Abbottabad

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