

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1371/2019

Date of Institution ... 18.10.2019

Date of Decision ... 11.11.2021

Mr. Aman Ullah S/o Faiz Muhammad, R/o Village Muryali Mohallah Isran Wala,  
Tehsil & District Dera Ismail Khan, Junior Clerk Govt. High School Potah, Dera  
Ismail Khan. ... (Appellant)

**VERSUS**

The Government of Khyber Pakhtunkhwa through Secretary Elementary &  
Secondary Education, Peshawar and four others. ... (Respondents)

Mr. Pir Ghulam Khan,  
Advocate

... For Appellant

Mr. Asif Masood Ali Shah,  
Deputy District Attorney

... For Respondents

**ROZINA REHMAN**

...

**MEMBER (JUDICIAL)**

**ATIQ-UR-REHMAN WAZIR**

...

**MEMBER (EXECUTIVE)**

**JUDGMENT**

**ATIQ-UR-REHMAN WAZIR MEMBER (E):-**

Brief facts of the

case are that the appellant has been serving as junior clerk in education department since 1991. The appellant was supposed to be promoted to the post of senior clerk, but his case for promotion was deferred every time for certain reasons for quite longer time and junior to the appellant were promoted. Feeling aggrieved, the appellant filed departmental appeal assailing the impugned promotion orders, the last one issued on 29-05-2019. His departmental appeal was not responded within the stipulated timeframe, hence the instant appeal with prayers that the impugned order of promotion may be set aside to the extent that

the appellant may be promoted retrospectively in terms of inter se seniority and back benefits.

02. Learned counsel for the appellant has contended that in the year 2008 the appellant received sum of Rs, 59532/ in respect of medical re-imburement, which actually were incurred on treatment of the appellant, but were malafiedly declared as illegal withdrawal; that the appellant being a law abiding citizen, deposited the said amount in the concerned head of account; that the said amount was voluntarily returned under Section 25 (a) of NAB Ordinance and as per letter dated 27-08-2013 of NAB authorities, the appellant was no more an accused; that the appellant was deferred repeatedly on this reason, which is unlawful; that juniors of the appellant were promoted and the appellant was deferred every time; that the appellant deserved to be promoted alongwith his ~~batch-mates~~, being the senior and otherwise eligible for promotion; that the appellant has been discriminated, as junior to the appellant namely Qaisar Muhammad at seniority No. 96, who had also deposited such amount to NAB, has been promoted, whereas the appellant was not promoted; that the department has also issued clearance/demand certificate for promotion of the appellant, which is evident from record; that during the course of litigation, the appellant was promoted vide notification dated 15-02-2021, but with immediate effect, which however was required to be effected from the date when his juniors were promoted, as the appellant was illegally and unlawful deprived of his rightful promotion.

03. Learned Deputy District Attorney for the respondents has contended that in view of pendency of an inquiry in NAB against the appellant, his case for promotion was deferred so many times; that his promotion was deferred in accordance with law as the appellant had entered into voluntary return of the embezzled amount to NAB, hence was not entitled for promotion at that particular

time; that now the appellant has been promoted to the post of senior clerk vide order dated 15-02-2021, hence his grievances has been redressed.

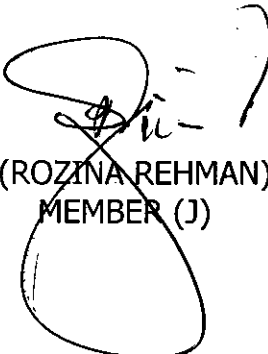
04. We have heard learned counsel for the parties and have perused the record.

05. Record reveals that a preliminary inquiry was initiated against the appellant and others on the charges of illegal drawl of amount in respect of medical re-imbusement. Placed on record is a letter of NAB authorities addressed to the appellant, offering the appellant the facility of voluntary return of the amount in question under section-25(a) of the NAB Ordinance,1999 and in return, the appellant will not be declared as an accused. In accordance with the provisions, the appellant voluntarily returned the disputed amount on 05-10-2013 and such inquiry was closed at the preliminary stage after return of the disputed amount. The action so taken was in accordance with the provisions of the NAB Ordinance and the appellant was entitled for such amnesty as per law at that particular time. We have noted that case of the appellant for promotion to the next grade was repeatedly deferred under the pretext that NAB inquiry is pending against the appellant, which however was not pending. Finally during the course of litigation, the appellant was promoted to next grade vide order dated 15-02-2021, but with immediate effect. Placed on record is a letter dated 19-05-2018 of District Education Officer, addressed to Director Education, recommending the appellant for further promotion with retrospective effect, as the appellant has already deposited the disputed amount and nothing is pending against him. Similarly another letter dated 27-03-2019 also reiterate the same stance, but the respondents malafiedly deprived the appellant of his rightful promotion, knowing the fact that the case has been closed down after voluntary return. The learned Deputy District Attorney appearing on behalf of respondents was confronted with the situation as to what happened when all of a sudden the appellant was promoted inspite of the fact that the stigma of voluntary return of the disputed


amount is still in field, but the learned Deputy District Attorney could not respond on this point. We are of the opinion that the appellant was unlawfully deprived of his rightful promotion, which however was not warranted, as the appellant returned the amount under the cover of law, which does not entail any punishment in any shape, hence his deferment for this very reason was not in accordance with law.

06. In view of the foregoing discussion, the instant appeal is accepted. The appellant stands entitled for promotion from the date, when he was deferred for the first time alongwith all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED  
11.11.2021



(ROZINA REHMAN)  
MEMBER (J)



(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

ORDER


11.11.2021

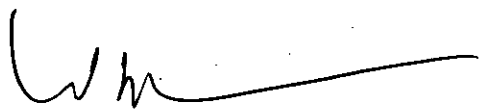
Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal is accepted. The appellant stands entitled for promotion from the date, when he was deferred for the first time alongwith all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

11.11.2021

  
(ROZINA REHMAN)  
MEMBER (J)

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

25.10.2021

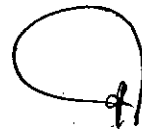
Appellant with counsel present.

Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 to 4 present. Counsel for private respondent No.5 present and submitted reply/comments which is placed on file.

Partial arguments heard. To come up for remaining arguments on 27.10.2021 before D.B at Camp Court D.I. Khan.



(ATIQU-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)  
CAMP COURT, D.I KHAN



(ROZINA REHMAN)  
MEMBER (JUDICIAL)  
CAMP COURT, D.I KHAN

27.10.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney Kamran Khan ADEO for respondents present.

Arguments heard. To come up for order on 09.11.2021 before this D.B at Principal Seat Peshawar.



(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, D.I.Khan



(Rozina Rehman)  
Member(J)  
Camp Court, D.I.Khan

Due to COVID-19 therefore to come  
up for the same on 27/9/21

On  
Reader

27.09.2021

Learned counsel for the appellant present. Mr. Muhammad Kamran, ADO (Litigation) alongwith Mr. Usman Ghani, District Attorney for official respondents No. 1 to 4 present. Comments on behalf of respondents No. 1 to 3 submitted, copy of which handed over to learned counsel for the appellant.

Previous date was changed on Reader Note, therefore, notice be issued to private respondent No. 5 as well as his counsel with the directions to furnish reply/comments. To come up for comments of private respondent No. 5 as well as arguments before the D.B on 25.10.2021 at Camp Court D.I.Khan.

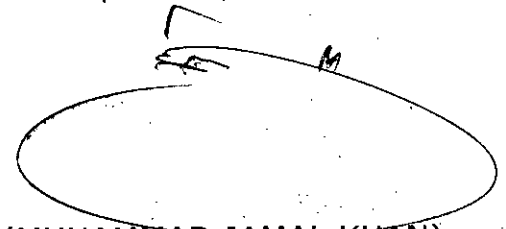


(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT D.I.KHAN

28.10.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Kamran, ADO (Litigation), for the respondents are also present.

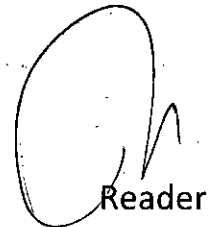
According to the representative of respondents the appellant has been promoted but notification to this effect has not been published in the official gazette, the moment requisite notification is published, all the relevant documents would be produced before the Tribunal for perusal, for the submission of which time has been sought, time given. To come up for the same on 22.12.2020 before S.B at Camp Court, D.I.Khan.



(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT D.I.KHAN

22.12.2020

Due to Pandemic of Covid-19, the case is adjourned to 22.02.2021 for the same.



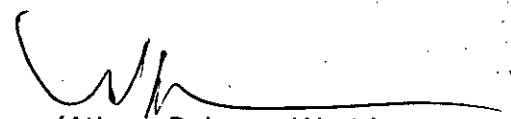
Reader

22.02.2021

Counsel for the appellant present.

Noor Zaman Khattak learned District Attorney alongwith Kamran ADO for respondents present.

Written reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit written reply/comments. Granted. To come up for written reply/comments on 24.05.2021 before S.B at Camp Court, D.I Khan.



(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, D.I Khan



26/3/2020

Due to COVID-19 the case is adjourned. To come up for the same 22/4/2020 at Camp Court, D.I Khan

  
Reader

22/4/2020

Due to COVID-19 the case is adjourned. To come up for the same 23/4/2020 at Camp Court, D.I Khan

  
Reader

23.09.2020

Counsel for appellant present.

Mr. Usman Ghani, learned District Attorney alongwith Muhammad Kamran, ADO for official respondent No. 1 to 3 present. None present on behalf of private respondent No. 5.

Written reply/comments on behalf of respondent No.4 already submitted. Representative of respondent No. 1 to 3 ✓ requested for time to file written reply/comments; granted. To come up for written reply/comments on behalf of official respondent No. 1 to 3 and private respondent No.5 on ✓ 28.10.2020 before S.B at Camp Court D.I Khan. Notice be issued to private respondent No.5 and his counsel for the date fixed.




(Rozina Rehman)  
Member (J)  
Camp Court; D.I Khan

Service Appeal No. 1371/2019


29.01.2020

Clerk to counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Kamran, ADO (Litigation) on behalf of official respondents No. 1 to 3, Mr. Muhammad Rashid, Assistant Account Officer on behalf of official respondent No. 4 and private respondent No. 5 in person present and submitted Vakalatnama of Muhammad Anwar Yousafzai, Advocate. Representative of official respondent No. 4 submitted written reply on behalf of respondent No. 4 which is placed on record. Representative of official respondents No. 1 to 3 as well as private respondent No. 5 requested for further time for filing of written reply. Case to come up for written reply/comments on behalf of official respondents No. 1 to 3 as well as private respondent No. 5 on 26.02.2020 before S.B at Camp Court D.I.Khan.

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I.Khan.

26.02.2020

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Kamran, ADO (Litigation) on behalf of respondents No. 1 to 3 present. Representative of respondents No. 1 to 3 requested for further time to furnish written reply/comments. Written reply on behalf of respondent No. 4 has already been submitted. To come up for written reply/comments on behalf of respondents No. 1 to 3 & 5 on 26.03.2020 before S.B at Camp Court D.I.Khan.


  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I.Khan.

27.11.2019

Counsel for the appellant Aman Ullah present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving as Junior Clerk in Education Department. It was further contended that the appellant was fully entitled and eligible for promotion to the post of Senior Clerk but the respondent-department has ignored the appellant and promoted the juniors to the appellant vide notification dated 29.05.2019 without any reason, therefore, the appellant filed departmental appeal on 25.06.2019 which was not responded hence, the present service appeal. It was vehemently contended that the respondent-department are bound to promote the appellant from the due date of promotion to the post of Senior Clerk.

The contention raised by learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 29.01.2020 before S.B at Camp Court D.I.Khan.

Appellant Deposited  
Security & Process Fee

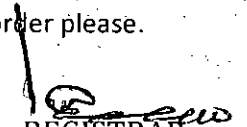

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I.Khan

Form- A

# FORM OF ORDER SHEET

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

Case No.- 1371/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge.
1	2	3
1-	18/10/2019	<p>The appeal of Mr. Amanullah received today by post through Mr. Pir Ghulam Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 18/10/19</p>
2-	15-11-19	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>27.11.2019</u></p> <p> CHAIRMAN</p>

**BEFORE THE HONOURABLE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 1371

Year 2019

Mr. Aman Ullah

**VERSUS**

Govt. of KPK etc

**INDEX**

S.No	Description of Documents	Annexure	Page
1.	Grounds of service appeal		1-4
2.	Copy of seniority list	A	5-8
3.	Copy of NAB letter and copy of refund in HBL	B & C	9-11
4.	Copy of NAB effectives promoted notifications	D1 & D2	12-18
	Copy of impugned notification dated 29/05/2019	E	19-20
5.	Copy of departmental clearance certificate for appellants promotion to S.Clerk	F1 & F2	21-22
6.	Copy of departmental appeal	G	23-24

7 *wakalat nama*

H - 25

**PETITIONER**
  
 Mr. Aman Ullah

Through Counsel

  
 Pir Ghulam Khan  
 Advocate

①

**BEFORE THE HONOURABLE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 1371

Year 2019

**Mr. Aman Ullah** S/o Faiz Mohammad, R/o Village Muryali Mohallah Isran Wala, Tehsil & District Dera Ismail Khan. Junior Clerk Govt. High School Potah, Dera Ismail Khan.

Khyber Pakhtunkhwa  
Service Tribunal  
(Appellant)

Diary No. 1464

Dated 18/10/2019

**VERSUS**

1. The Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. The Director Education Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male) Dera Ismail Khan.
4. District Accounts Officer, D.I.Khan.
5. ✓ Qafer Muhammad Shah S/o Iftkhar Muhammad Shah, Senior Clerk, Govt. Girls School Naiwela; District DIKhan.

(Respondents)

Subject:

**SERVICE APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST IMPUGNED ORDER FOR PROMOTION FROM JUNIOR CLERK BPS-11 TO SENIOR CLERK (BPS-14) VIDE ENDST. NO.281-341/A-23/MS/PROMOTION JC TO SC /2019-11 DATED 29.05.2019, BEING DISCRIMINATORY AGAINST ARTICLE 25 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 AND IS TO BE SET ASIDE UPTO THE EXTENT TO PROMOTE THE APPELLANT ALONGWITH ALSO RETROSPECTIVELY ALONGWITH THE INTER SE SENIORITY AND ALL BACK BENEFITS WITH THE FACTS AND GROUNDS PRAYED BELOW**

Honourable Sir,

1. That the appellant has been serving as junior clerk in Elementary & Secondary Education (E&SE) since 29.04.1991 and has rendered nearly 28 years service upto the entire satisfaction of superiors.
2. That most of the appellant's batch fellows have been promoted to the post of senior clerk vide Director E&SE KPK notifications;-
  - i. Notification No.5018-5218/A-23/MS, dated 30.05.2017.
  - ii. Notification No.4870-82/A-23/MS, dated 30.06.2017.
  - iii. Notification No.7665-7860, dated 19.04.2019 respectively,

Filed to-day  
Registrar  
18/10/19

2

iv. And even latest notification No.281-341/A-23/MS, dated 29.05.2019. But I being senior to them have been deprived from promotion.

3. That in the tentative list of seniority 2018, the seniority number of the appellant is 64, while the seniority of Mr. Qaiser Muhammad Shah is 96 annexed (A).

4. That after, having being deprived from latest promotion on dated 29/05/2019, responding to the reason/question, the department explained that the appellant had received some amount out of Medical Reimbursement Charges (MRC) head and the same case was under investigation in NAB Peshawar and that's why his name was excluded from the promotion list and deprived.

**Now let me contest sir :-**

a. That in the year 2008 the appellant received sum of Rs.59,532/- MRC, which actually and honestly were incurred on the treatment of the appellant.

b. That on the direction / instructions of the NAB, with the terms and conditions from the NAB authorities without any stain on the service career of the appellant, refunded the same amount vide HBL receipt No. 928742 dated 05/10/2013 Annexure (B - C).

c. That the department, being much discriminatory, in the violation of all the rules of equity and justice promoted dozens of identical incumbents Annexure (D1 & D2).

d. That, the one junior to the appellant named Mr. Qaiser Muhammad Shah at seniority No. 96, who also had refunded the MRC amount, has been promoted, but the appellant, being at Serial No. 64 and senior to him has been deprived of promotion vide No. 281-341/A-23 MS/Promotion/G/C to S/C/2017-II dated 29/05/2019. Copy of impugned order dated 29/05/2019 (Annexure -E).

e. That pertinent to say the department had also issued clearance / demand certificate for promotion of the appellant to senior clerk (Annexure F1 & F2).

f. That the appellant waited for a statutory period of 90 days but no order has been passed on the appeal. Hence the instant appeal is within time. Copy of appeal annexed (G).

(3)

That the Honourable Service Tribunal is vested with vast powers to accept the instant appeal and to direct the respondents to promote the appellant retrospectively, with inter se seniority and all back benefits.

- h. That the counsel of the appellant may kindly be allowed to raise additional grounds at the time of arguments.

**PRAYERS:**

It is, therefore, humbly prayed to issue an order in favour of the appellant and against the impugned order issued by respondents directing therein to promote the appellant retro respectively alongwith inter se seniority and all back benefits and all other benefits this Honourable Court deems fit.

**PETITIONER**

Mr. Aman Ullah

Through Counsel

Pir Ghulam Khan  
Advocate



4

AFFIDAVIT:

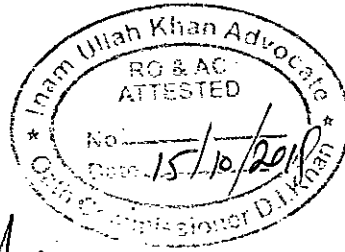
I, Mr. Amanullah Junior Clerk of GHS Potah solemnly declare and affirm on oath that the contents of the suit are correct up to the best of my knowledge and nothing has been concealed from this honorable Tribunal.

Humble appellant

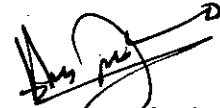


(Mr. Amanullah)

Junior Clerk



Through advocate



(Pir Ghulam Khan)

5

A

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Updated Seniority List of J-Clerks/Store Keeper/ASK/ in and under Directorate E&SE, DCTE, Merged Tribal Districts & PITE Khyber Pakhtunkhwa corrected upto 31/10/2018

S.#	Name	Father's Name	Desig	Domicile	Date of Birth	Date of 1st apptt in E&SE deptt	D-O Apptt as JC, ASK, LA	Present place of posting	Remarks
1	AHMAD KHAN	GUL MUHAMMAD	J/Clerk	DIK	3/15/1961	5/5/1979	5/5/1979	GHS RATTA KULACHI DIK	
2	Gul Nabi	Muzafar Khan	J/Clerk	Nowshera	10/15/1959	11/14/1979	11/14/1979	G Shaheed Iqbal HS Tarkha Nov	Appeal
3	Muhammad Ghufraan	Muhammad Dur Khan	J/Clerk	Bannu	3/28/1960	1/16/1981	1/16/1981	Bannu	
4	Yousaf Shah	Midrarul Haq	J/Clerk	Swat	2/10/1968	10/21/1981	10/21/1981	GHS Qambar	
5	M/Zul Zareen	Muhammad Miskeen	J/Clerk	Abbottabad	5/9/1964	12/24/1981	12/24/1981	GHS Kanthiali	
6	Iftikhar Ahmad	Haji Gul	J/Clerk	Kohat	4/4/1961	11/6/1982	11/6/1982	GCHS Kohat	
7	Abdul Jameel	Abdul Bari	J/Clerk	Shangla	9/8/1962	12/27/1982	12/27/1982	GHSS Olandar	
8	Saad ullah Jan	Shadat Khel	J/Clerk	Karak	2/21/1959	2/1/1983	2/1/1983	GHS Ganderi Khattak	
9	Arifullah	Siffatullah	J/Clerk	FR-Bannu	4/1/1961	11/7/1985	11/7/1985	GHS Muhammad Khel FR	
10	Abdullah Khan	Muhammad Shah	J/Clerk	Karak	10/4/1968	1/9/1986	1/9/1986	GGHS Khojaki Killa	
11	Abdur Rauf	Khoshab Din	J/Clerk	Kohat	3/13/1962	9/4/1986	9/4/1986	GHS Barh	
12	Iran Badshah	Khiali Khan	J/Clerk	Karak	3/21/1969	10/23/1986	10/23/1986	DEO(M) Karak	
13	Amir Zada	Mohammad Hassan	J/Clerk	BAJOUR	5/15/1964	11/22/1986	11/22/1986	GHS Loi Sam Bajour Agcy	
14	Shah Afzal	Abdul Manan	J/Clerk	Swat	1/25/1966	11/22/1986	11/22/1986	GHSS Kabal	
15	Nazir Shah	Raheem Shah	J/Clerk	Haripur	2/13/1967	12/6/1986	12/6/1986	GGHS Ghazi Hamlet	
16	Alamzeb	Subhanuddin	J/Clerk	SWA	2/3/1966	12/10/1986	12/10/1986	GHS Tiarza SWA	
17	Abdul Salam	Abdul Mateen	J/Clerk	Swat	5/3/1960	1/1/1987	1/1/1987	GHS Dardyal	
18	Saifur Rehman	Fazlur Rehman	J/Clerk	Peshawar	4/21/1962	3/5/1987	3/5/1987	GHS: Urmr Bala Peshawar	
19	Mir Hussain	Faqir Hussain	J/Clerk	Nowshera	1/1/1967	3/8/1987	3/8/1987	GHS, Manahi	
20	Muhammad Sultan	Ali Khan	J/Clerk	Karak	2/2/1966	5/1/1987	5/1/1987	GHS, Shahidan Banda	
21	Waheedullah	Manak Khan	J/Clerk	FR Bannu	11/25/1967	5/11/1987	5/11/1987	GHS Saadullah FR, Bannu	
22	Iltaf Hussain	Nazir Hussain	J/Clerk	Orakzai	11/11/1968	5/21/1987	5/21/1987	GHS And Khel Orakzai Agy	
23	IRSHAD AHMED	MUFARIQ SHAH	J/Clerk	Pesh	4/29/1968	9/5/1987	9/5/1987	GGHS Gul Bahar	
24	Said Anwar	Khan Asghar	J/Clerk	NWA	4/2/1968	9/17/1987	9/17/1987	GHS Pir Sahib Jan Kot NWA.	
25	Ikram Ullah	Yaqeen shah	J/Clerk	Nowshera	11/4/1969	10/1/1987	10/1/1987	GHS, Aza Khel Bala	
26	Matiullah	Habibullah	J/Clerk	FR Tank	2/11/1968	10/27/1987	10/27/1987	GHS Khirgai FR, Tank	
27	Zahoor Hussain	Gulab Hussain	J/Clerk	Kurram Agncy	7/1/1966	12/8/1987	12/8/1987	GHS Kung Alizai Kurr:Agncy	
28	SHAH NAWAZ KHAN	Haji DANISH	J/Clerk	Pesh	1/25/1964	12/23/1987	12/23/1987	GGHS Civil Colony	

Affected  
Khan  
Cipar  
Murya  
Khan

6

29	Miranshah	Muhibullah	J/Clerk	FR-Tank	5/9/1968	12/23/1987	12/23/1987	GHS Pir Tangi Ft, Tank	
30	Muhammad Ismail	Muhammad Qahar	J/Clerk	Shangla	4/18/1968	4/14/1988	4/14/1988	DDO (M) Primary Shangla	
31	Khitab Gul	Sardar Khan	J/Clerk	NWA	2/18/1966	5/25/1988	5/25/1988	GHS Taj Mohammad Kot NWA	
32	MUHAMMAD IQBAL	KHAN SHER	J/Clerk	Pesh	6/22/1968	8/10/1988	8/10/1988	GHSS DAAG	
33	Mumtaz Ali	Shamsul Qamar	J/Clerk	Swabi	1/25/1965	9/16/1988	9/16/1988	GHS Tarakai	
34	ZAKI ULLAH	FAZAL/E/REH	ASK	Pesh	10/20/1962	10/12/1988	10/12/1988	GTHSS GULBAHAR	
35	IRSHAD AHMED	FAQEER MUHAMMAD	J/Clerk	Pesh	3/16/1968	11/24/1988	11/24/1988	GGHS Shaikh Abad	
36	MUHAMMAD IBRAHIM	Malik HABEEB KHAN	J/Clerk	Pesh	1/1/1967	11/26/1988	11/26/1988	GHSS CHAMKANI	
37	Altaf Alam	Ghous/ud/Din	J/Clerk	SWA	8/15/1970	8/15/1989	8/15/1989	GHS Nano SWA	
38	SADDAQAT KHAN	AMRAT KHAN	J/Clerk	Pesh	3/5/1969	8/28/1989	8/28/1989	GGHSS CHAMKANI	
39	Tanveer Mujeeb	Mehboob Alam	J/Clerk	Abbottabad	5/17/1970	9/17/1989	9/17/1989	GHS Nareela	
40	Sher Ali Khan	Gulab Shah	J/Clerk	Dir Lower	11/1/1969	10/1/1989	10/1/1989	GGCMHS Timergara	Appeal
41	Amjad Sohail	Mohammad Rafique	J/Clerk	FR Peshawar	3/8/1971	10/16/1989	10/16/1989	GHS Faridi FR, Peshawar	
42	Imtiaz Hussain	Ajab Khan	J/Clerk	Abbottabad	2/15/1965	12/1/1989	12/1/1989	GHS Moolia	
43	Muhammad Afzal	Umeer Khan	J/Clerk	Swat	3/15/1962	12/9/1989	12/9/1989	GHSS Fatahpur	
44	MANZOOR ALAM	UMAR KHAN	J/Clerk	Pesh	1/12/1968	1/10/1990	1/10/1990	GHS Beri Bagh	
45	Musharaf Khan	Amanullah	J/Clerk	FR Kohat	3/12/1969	2/25/1990	2/25/1990	GHS Paya FR, Kohat	
46	MUHAMMAD YOUSAF	BAHADER SHER	J/Clerk	LAKKI	7/3/1964	3/3/1990	3/3/1990	GHS KHEO KHEL PACA	
47	sharifullah	Sher Ghazi Khan	J/Clerk	Chitral	3/15/1966	4/18/1990	4/18/1990	GHSS: Shahgram	
48	Rahmat Illahi	Zindagani	J/Clerk	Chitral	10/16/1963	4/19/1990	4/19/1990	GGHS: Booni	
49	Jehanzeb	Rahim Jan	J/Clerk	BAJOUR	2/3/1968	5/10/1990	5/10/1990	GHS Zoor Bander Bajour Agy	
50	Rashid Ahmad	Habib/Ur/Rahman	J/Clerk	Shangla	4/1/1979	5/26/1990	5/26/1990	GHSS Shahpur	
51	SOHAIL AHMAD	ABDUL QAYUM	J/Clerk	Pesh	1/28/1969	6/5/1990	6/5/1990	GGHS Shaheen Camp	
52	Hassan Gul	Zarin Gul	J/Clerk	Nowshera	1/7/1970	10/25/1990	10/25/1990	GHS, Mali Khel Bala	
53	AMBER KHAN	UMAR KHAN	J/Clerk	Pesh	3/5/1969	1/1/1991	1/1/1991	GHSS HAZAR KHAWANI	
54	Muhammad Shamraiz	Muhammad Banaras	J/Clerk	Haripur	3/10/1959	1/2/1991	1/2/1991	GGHS Kaileg Haripur	
55	Jahan Zeb Khan	Mir Ahmad Khan	J/Clerk	Karak	6/5/1970	1/14/1991	1/14/1991	Karak	
56	Azhar Mehmood	Muhammad Suleman	J/Clerk	Abbottabad	5/29/1969	1/16/1991	1/16/1991	GHSS Nawanshehr	
57	Mashkooor Ahmad	Abdul Shakoor	J/Clerk	Mansehra	1/28/1965	1/19/1991	1/19/1991	GHS No.2 Mansehra	
58	Muhammad Tariq Mahmood	Israr ud Din	J/Clerk	Nowshera	8/4/1967	2/1/1991	2/1/1991	GHSS, Risai Pur	
59	Abdul Wali	Gul Wali Khan	J/Clerk	FR, Bannu	3/12/1971	2/2/1991	2/2/1991	GHS Sitti Killa FR, Bannu	
60	Ayaz Mohammad J/C	Malik Aman	J/Clerk	Mardan	12/26/1970	2/4/1991	2/4/1991	GHS Gujrat	
61	Fazal Rehman	Jabbar Khan	J/Clerk	Kohat	4/11/1971	2/18/1991	2/18/1991	DEO(M) Kohat	
62	MUHAMMAD JAHANGIR	SHER AFZAL	J/Clerk	Pesh	10/12/1966	3/7/1991	3/7/1991	GGHS Irrigation	
63	Bulbul Aziz	Ali Rahmat	J/Clerk	Chitral	2/10/1968	3/13/1991	3/13/1991	GHS: Mastuj	
64	Aman Ullah	Faiz Muhammad	J/Clerk	D/I/K	6/10/1971	4/29/1991	4/29/1991	GGHS Da:aban Khurd /	

Attache

Principal  
G.H.S.S Muryali  
N.I. Khan

7

65	Akhtar Zaman	Hayat Ullah	J/Clerk	Karak	4/2/1968	5/9/1991	5/9/1991	SDEO(F) T/Nasrati	
66	Angoor Shah	Udin Shah	J/Clerk	Karak	7/8/1960	5/13/1991	5/13/1991	Karak	
67	Muhammad Shafique	Sheikh Ahmed	J/Clerk	Abbottabad	2/13/1961	5/19/1991	5/19/1991	GHS No/4 Abbottabad	
68	Rashid Iqbal	Muhammad Junaid	J/Clerk	Swat	7/11/1971	5/26/1991	5/27/1991	GHS Topsisin	
69	Muhammad Rahman	Haji Saifur Rahman	J/Clerk	Swat	3/10/1967	5/28/1991	5/28/1991	GGHSS: No. 2 Mingora Swat	Appeal
70	Abdul Qadir	Sain Khan	J/Clerk	Mansehra	5/1/1969	6/1/1991	6/1/1991	GHS Jaba	
71	Riaz Ali	Lal Ghalib	J/Clerk	Mardan	5/4/1970	6/3/1991	6/3/1991	GHS Katlang	
72	Muhammad Ali	Faqir M. Khan	J/Clerk	Charsadda	4/10/1967	6/6/1991	6/6/1991	AD Exam: at PITE, Peshawar	
73	Siraj Mohammad J/C	Ahmad Khan	J/Clerk	Mardan	5/5/1972	6/12/1991	6/12/1991	GHS Hathian	
74	Sultan Farid	Faqir	J/Clerk	Swabi	2/1/1969	6/15/1991	6/15/1991	SDEO (F) Topi	
75	Sareer Khan	Hayat Khan	J/Clerk	Swabi	2/18/1968	6/16/1991	6/16/1991	GGHSS Kalabat	
76	Fazli Elahi	Haidar Khan	J/Clerk	Charsadda	1/1/1969	6/16/1991	6/16/1991	GGHS: Nahaqi Gulabad	
77	Sarfraz	Ghulam Qadir	J/Clerk	Kohistan	1/4/1971	6/16/1991	6/16/1991	GHS Jijal	
78	NAIK MUHAMMAD	KHADI MUHAMMAD	J/Clerk	MALAKAND	3/27/1969	6/17/1991	6/17/1991	Malakand	
79	Ijaz Ali	Arshullah Khan	J/Clerk	Mardan	3/15/1969	6/18/1991	6/18/1991	GHS No 1 B Gunj	
80	Muhammad Sajid	Faujoon Khan	J/Clerk	Swabi	4/12/1969	6/20/1991	6/20/1991	GGHS Lahor	
81	Mohammad Naeem	Lal Badshah	J/Clerk	Swabi	9/6/1970	6/20/1991	6/20/1991	GHS Manki	
82	Nisar Khan J/C	Sarwar Shah	J/Clerk	Mardan	2/12/1969	6/26/1991	6/26/1991	GHS katlang	
83	Muhammad Rafiq	Faiz Ullah Khan	J/Clerk	Swabi	3/3/1967	7/1/1991	7/1/1991	GGHSS Kotha	
84	BAKHT NAEEM	MUHAMMAD KHAN	J/Clerk	MALAKAND	4/12/1972	7/1/1991	7/1/1991	Malakand	
85	Naveed Akhtar	Muhammad Hamayun	J/Clerk	Abbottabad	7/10/1977	7/1/1991	7/1/1991	GGHSS Havelian	
86	Fazli Wahid J/C	Muntazir Khan	J/Clerk	Mardan	4/2/1966	7/2/1991	7/2/1991	GGHS Hathyan	
87	Saad Ullah Khan	Allah Dad	J/Clerk	DIK	8/5/1971	7/3/1991	7/3/1991	GHS GANDI UMAR KHAN	
88	Jehanzeb Khan	Sher Afzal	J/Clerk	Peshawar	12/10/1966	2/19/1986	7/4/1991	GGHS: Islamia Collegiate.	
89	Tehmas Khan	Ali Gohar Khan	J/Clerk	Abbottabad	3/9/1969	7/6/1991	7/6/1991	GHS Pawa	
90	Mian Noor J/C	Alam Noor	J/Clerk	Mardan	3/20/1966	7/7/1991	7/7/1991	EDO Mardan	
91	Muhammad Zarif	Gul Zaman	J/Clerk	Bannu	1/1/1973	7/9/1991	7/9/1991	GHSS: Kotka M. Khan Banu	Appeal
92	Muhammad Ashraf	Lashkar Ali	J/Clerk	DIK	2/1/1965	7/10/1991	7/10/1991	GHS JATTA	
93	Shoukat Ali Shah	Musali Khan	J/Clerk	Kohat	4/16/1971	7/11/1991	7/11/1991	GHSS Togh Bala	
94	Fida Mohammad	Phok Lal	J/Clerk	Chitral	1/9/1969	7/15/1991	7/15/1991	GHSS: Muziasht	
95	Fayyaz Ali	Mohamamd Khan	J/Clerk	Swabi	3/4/1974	7/20/1991	7/20/1991	GHS Jagna Nath	
96	Qaisar Muhammad Shah	Iftikhar Muhammad Shah	J/Clerk	D/I/K	10/2/1965	7/21/1991	7/21/1991	GGHS Fateh DiKhan /	
97	Riaz ud Din	Imad ud Din	J/Clerk	Nowshera	2/27/1961	7/30/1991	7/30/1991	GGHSS, Shaidu	
98	Saif Ullah	Hanif Ullah	J/Clerk	Nowshera	2/27/1973	7/31/1991	7/31/1991	GHS, Misri Banda	
99	KHISTA UR REHMAN	AZAM KHAN	J/Clerk	Pesh	11/22/1964	8/1/1991	8/1/1991	DEO (M) Peshawar.	
100	Muhammad Iqbal	Misal Khan	J/Clerk	Swabi	1/10/1966	8/1/1991	8/1/1991	GGHS Dagi	

Attested

*[Signature]*  
Principal  
G.H.S.S Muryali  
D.I.Khan

8

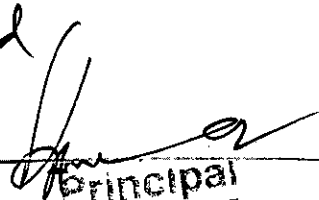
2172	Muhammad Ali	Karim Bakhsh	J/Clerk	DIK	05-04-81	22-04-14	22-04-14	GHSS: No. 2 Paharpur DII	
2173	Shah Hussain	Haji Islam Jan	J/Clerk	Mohmand	11-01-80	28-01-06	30-04-14	GGHS: Mian Mandi M.Ajly	
2174	Mst. Zuhra Mumtaz	Mumtaz Ali	J/Clerk	Peshawar	11-10-87	08-05-14	08-05-14	GGHS Lady Girfth Peshawar	appeal
2175	Muneeb ur Rehman	Nafees Ud Din	J/Clerk	Mardan	02-09-96	01-06-16	01-06-16	DEO (M) Mardan	appeal
2176	Zafar Ullah	Fazle Malik	J/Clerk	Mardan	06-04-92	28-09-16	28-09-16	GHS Mala Dheri Mardan	appeal
2177	Sajjad Amin	Muhammad Ameen	J/Clerk	Swabi		22-10-16	22-10-16	GHS Sheikh Dheri Swabi	appeal
2178	Azeem Shaid	Gul Shaid	J/Clerk	Mardan	16-04-87	25-07-16	24-11-16	GHS Zore Abad Mardan	appeal
2179	Adnan Khan	Mukhtiar Khan	J/Clerk	Mardan	07-04-91	24-11-16	24-11-16	DEO (M) Mardan	appeal
2180	Muhammad Uzair Ahmad	Mukhtar Ahmad	J/Clerk	Mardan	10-02-95	29-08-17	29-08-17	Ghs babuzai Mardan	appeal

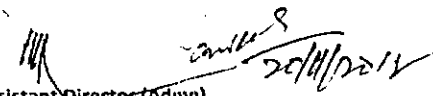
Director Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst:No. \_\_\_\_\_/File No.A-23/MS/Updated Seniority List/Junior Clerks/ASK/2017 Dated Peshawar the, \_\_\_\_/\_\_\_\_, 2018.

Copy of the above is hereby forwarded to the:

1. P/S to the Secretary to the Govt: of Khyber Pakhtunkhwa, E&SE Deptt:
2. Director of Curriculum & Teacher Education, Khyber Pakhtunkhwa, Abbottabad with the request that all the particulars of Junior Clerk/Store Keeper/ASK working under his jurisdiction be checked by his responsible officer from their service record and submit alist/appeal for correction, within 15 days positively (if any) .
3. Director of Education (PESH), Warsak Road Peshawar with the request that all the particulars of Junior Clerk/Store Keeper/ASK working under his jurisdiction be checked by his responsible officer from their service record and submit alist/appeal for correction, within 15 days positively (if any) ..
4. Director PITE, Khyber Pakhtunkhwa, Peshawar with the request that all the particulars of Junior Clerk/Store Keeper/ASK working under his jurisdiction be checked by his responsible officer from their service record and submit alist/appeal for correction, within 15 days positively (if any) .
5. All the District Education Officers (M/F) in Khyber Pakhtunkhwa with the request that all the particulars of Junior Clerk/Store Keeper/ASK working under his jurisdiction be checked by his responsible officer from their service record and submit alist/appeal for correction, within 15 days positively (if any) .
6. Deputy Director EMIS, E&SE Department
7. All Deputy Directors Local Directorate with the request that all the particulars of Junior Clerk/Store Keeper/ASK working under his jurisdiction be checked by his responsible officer from their service record and submit alist/appeal for correction, within 15 days positively (if any) .
8. All Sub Divisional Education Officers (M/F) in Khyber Pakhtunkhwa with the request that all the particulars of Junior Clerk/Store Keeper/ASK working under his jurisdiction be checked by his responsible officer from their service record and submit alist/appeal for correction, within 15 days positively (if any) .
9. PA to Director E & SE , Local Directorate.
- 10.. PA to Addl: Director Establishment Local Directorate.

Attested  
  
Principal  
G.H.S.S Muryali,  
D.I.Khan.

  
Assistant Director (Admin)  
Directorate E & SE, Khyber Pakhtunkhwa  
Peshawar.

(9) (B)

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حکومت پاکستان  
قانونی احتساب، وزیر خیر بختونخوا  
ای ای ای کے پاس کے بلات 111، ٹیڑا، حیات آباد پشاور

1/52/IV-IVR-PB/NAB KPIK

رضا کارانہ دادا جی (والٹری ریٹرن) کی مہلت

رضا کارانہ دادا جی (والٹری ریٹرن) کی مہلت

آپ کے خلاف قومی احتساب آرڈیننس مجریہ 1990ء کی سشن نمبر (a) 25 کے تحت کارروائی کی جا رہی ہے۔ اور آپ کا کیس  
اسی نکتہ کی تصدیق انکوائری کی سطح پر ہے۔ آپ کیلئے موقع ہے کہ آپ رضا کارانہ طور پر سشن نمبر (a) 25 کے مطابق غیر قانونی طور پر  
حاصل کئے گئے اثاثہ جات واپس کر دیں یہ مہلت آپ کے پاس انکوائری کی تکمیل تک رہے گی۔ تفتیش (انوسٹی گیشن) کا حکم جاری ہے  
جس کے بعد یہ مہلت ختم ہو جائے گی۔ تاہم رضا کارانہ دادا جی کی صورت میں آپ پر سزا نہیں پائی جائے گی۔ جس کے بعد اس کی بارگاہی  
صورت میں سزا نہیں دی جائے گی۔ تاہم ہر کاروباری مہلے کے لئے 10 سال تک نا اہل قرار دیئے جاتے، ہر قسم کے غرضہ جات ایڈوانس اور  
جنگل والی مراعات کے لئے 10 سال تک نا اہل ہونے کی سزا میں آپ پر لاگو نہیں ہوں گی۔

واضح رہے کہ اگر آپ چاہیں تو اپنی آزادانہ مرضی استعمال کرتے ہوئے، اس خط کے ساتھ دیئے گئے نمونہ کے مطابق  
10 سالوں میں درخواست دائر کر سکتے ہیں۔

*(Signature)*  
id Master  
ri.S Potah  
D. I. Khan

*(Signature)*  
کیس آفیسر 1-IV ایڈیب خیر بختونخوا

(B)

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حکومت پاکستان

قومی احتساب بیورو، خیبر پختونخواہ

پی ڈی اے کیپلیکس، بلاک-III، فیز-7، حیات آ دپشاور

چھٹی نمبر 1/52/IW-I/VR-PB/NAB KPK/ 1907

برائے: امان اللہ جونیر کلرک

دراہن ڈیرہ اسماعیل خان

مضمون: رضاکارانہ ادائیگی (والنٹری ریٹرن) کی سہولت

1- آپ کے خلاف قومی احتساب آرڈیننس مجریہ 1999 کی شق نمبر 25(a) کے تحت کارروائی کی جا رہی ہے۔ اور آپ کا کیس بھی شکایت کی تصدیق / انکوائری کی سطح پر ہے۔ آپ کے لیے موقع ہے کہ آپ رضاکارانہ طور پر شق نمبر 25(a) کے مطابق غیر قانونی طور پر حاصل کیے گئے اثاثہ جات واپس کر دیں یہ مہلت آپ کے پاس انکوائری کی تکمیل تک رہے گی۔ تفتیش (انوسٹی گیشن) کا حکم جاری ہو جانے کے بعد یہ سہولت میسر نہ رہے گی۔ تاہم رضاکارانہ ادائیگی کی صورت میں آپ ملزم قرار نہیں پائیں گے۔ علاوہ ازیں پلی ریگین کی صورت میں ملزم قرار دیے جانے، تمام سرکاری عہدوں کے لیے 10 سال تک نااہل قرار دیئے جانے، ہر قسم کے قرضہ جات / ایڈوانس اور اب تک کی مالی مراعات کے لیے 10 سال تک نااہل ہونے کی سزائیں آپ پر لاگو نہیں ہوں گی۔

2- واضح رہے کہ اگر آپ چاہیں تو اپنی آزادانہ مرضی استعمال کرتے ہوئے، اس خط کے ساتھ دیے گئے نمونہ کے مطابق 10 دن میں درخواست دائر کر سکتے ہیں۔

--Sd--

محمد علی

Case Officer IW-I NAB.  
Khyber Pakhtunkhwa

© 11

HBL



HABIB BANK

NOT NEGOTIABLE  
A/C PAYEE ONLY

Banker's Cheque

This Banker's Cheque is valid for six months from date of issue

Circular Road, D.I. Khan (1355)

9287442

Cheque No. 5 OCT 2013  
Date

On Demand Pay  
To The Order Of

*Not valid for 59532 only*  
The Chairman NARS Islamabad

The sum of *Rs 59,532/-*  
*Five hundred and thirty two thousand*  
PAYABLE AT ANY HBL BRANCH IN PAKISTAN  
Centralised Cheque Payable Account  
30019903902586

For Habib Bank Limited

*Rs 59,532/-*  
DO NOT WRITE BELOW THIS LINE

AUTHORIZED SIGNATURE  
PA No. 3715

10 0 10 25 86 52 90 390 51 05 2 6 7 2 9

HBL



HABIB BANK

Banker's Cheque

Customer Advice

9287442

Cheque No.  
Date

5 OCT 2013

Circular Road, D.I. Khan (1355)

Favouring  
The sum of:

The Chairman NARS

*59532*  
*580*  
*150*  
*TAX*  
*260262*

*alsh*  
Head Master  
G.H.S Potah  
D. I. Khan

THIS IS A SYSTEM GENERATED ADVICE AND YOU MUST RECEIVE A SIGNATURE





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②  
72

GOVERNMENT OF PAKISTAN  
NATIONAL ACCOUNTABILITY BUREAU  
BLOCK-III, PDA COMPLEX, PHASE-V HAYATABAD  
PESHAWAR

Khyber Pakhtunkhwa

No. 1/34(625)/IW-I/NAB(KP) 7  
06 Sept, 2018

To: The Secretary,  
Elementary and Secondary Education,  
Government of Khyber Pakhtunkhwa,  
Peshawar

*Nawab. Cheet*

Subject: INQUIRY INTO EMBEZZLEMENT IN MEDICAL RE-IMBURSEMENT CHARGES BY ADMINISTRATION OF EDUCATION DEPARTMENT NWFP.

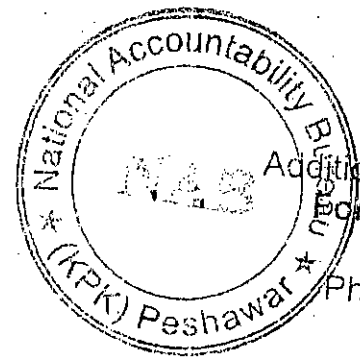
- Reference
1. Your office letter No. SO(S/M)E&SED/4-17/2015/Corruption in medial re-imburement/140 dated 31-07-2018
  2. This office letter No. 1/34(625)/IW-I/NAB(KP)/407 dated 27-04-2015

With reference to above mentioned letter of your office, please find enclosed herewith the list containing the required information as requested.

2. Forwarded for further necessary action in the light of above referred letter of this Bureau.

Encl:

*attch*  
As Above  
*[Signature]*



*[Signature]*  
Additional Director (Staff)  
for Director General  
(Zahir Shah)  
Ph No. 091-9217545

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR.



LIST OF NAB K.P. VOLUNTARY RETURN DATA SINCE INCEPTION TO 31-08-2016

S.No	S.No In NAB list.	Name /Father's Name	& Designation	Address	Amounts recovered	Year
1	567	Siraj Khan S/O Zarbakht	PST		1,50,000/-	2006
2	602	Shahid Nawaz	J/Clerk		1,30,000/-	2013
3	603/727	Muhammad Ayub S/O Muhammad Ramzan	SST		1,00,000/- +	2013/2014
4	604	Sami Ullah	J/Clerk		1,50,000/-	2013
5	605/726	Mamona Nisa S/O Hassan Shah	AT		1,58,995/-	2013
6	625	Miss Kaneez Fatma	PST		1,50,000/- +	2013/2014
7	627/683	Farzana Shahnaz D/O Ahmad Nawaz	SST		0,17,120/-	2013
8	628	Qazi Kifayat Ullah S/O Gul Muhammad	PST		0,60,000/-	2013
9	929	Sanaullah S/O Habib Ullah	PST		2,50,000/- +	2013
10	630	Muhammad Iqbal S/O Muhammad Nawaz	SS		82,067/-	2013
11	631	Sher Zaman S/O Muhammad Ramzan	PST		2,88,000/-	2013
12	632	Qazi Kiramot Ullah S/O Q. Gul Muhammad	PST		2,25,000/-	2013
13	633	Liaqat Ali Khan S/O Ghulam Qadir C	Clerk		2,03,820/-	2013
14	634	Tehzeeb Ul Islam W/O Muhammad Rehan	CT		1,50,000/-	2013
15	635	Abdul Qudoos S/O Ali Jan	PST		1,24,000/-	2013
16	636	Abdul Qaizar Khan S/O Ghulam Akbar	N/Qasid		1,15,000/-	2013
17	637	Muhammad Ashraf S/O Muhammad Ismail	CT		1,11,262/-	2013
18	638	Muhammad Asghar S/O Muhammad Azam Shah	CT		1,00,000/-	2013
19	639	Saif Ur Rehman S/O Sher Muhammad	CT		1,00,000/-	2013
20	640	Khalid Mehmood Anwar S/O Gul Muhammad	Ex Principal		0,80,000/-	2013
21	641	Allah Nawaz S/O Muhammad Bakhsh	HM		0,40,000/-	2013
22	642	Hasham Mehmood S/O Qadar Bakhsh	CT		0,40,000/-	2013
23	643	Hussain Bano D/O Muhammad Aslam Khattak	PET		0,35,000/-	2013
24	644	Inamullah Khan S/O Haji Inayat Ullah	DM		0,35,000/-	2013
25	645	Khalid Mehmood S/O Qadar Bakhsh	PST		0,30,000/-	2013
26	646	Muhammad Munir S/O Karim Bakhsh	CT		0,30,000/-	2013
27	647	Shahid Mehmood S/O Qadar Bakhsh	PST		0,30,000/-	2013
28	648	Muhammad Bilal S/O Allah Ditta	PST		0,30,000/-	2013
29	649	Zahida Parveen D/O Khuda Bakhsh	PST		0,27,000/-	2013
30	650	S.Fakhruddin S/O Nizam Ud Din	Asstt:		0,20,000/-	2013
31	651	Sajjad Amonrel S/O Ghulam	PST		0,55,000/-	2013
					0,54,000/-	2013

Head Master  
G.H.S Potah  
D. I. Khan

(14)


		Masih				
32	652	S. Mureed Hassan Shah S/O S. Masoom Shah	CT		2,28,523/-	2013
33	653	Umar Khan S/O Ahmad Khan	TT		0,28,000/-	2013
34	684	Zainab Bibi D/O Hakim Khan DM	DM		0,52,710/-	2013
35	685	Robina Afzal W/O Muhammad Yahya Tariq	Principal		0,45,000/-	2013
36	686	Rashid Mughal S/O Ghulam Sarwar	Ex Supdt:		0,45,000/-	2013
37	687	Abdul Hassan S/O Sher Khan	SST		0,40,000/-	2013
38	688	Nozia Anjum W/O Nizam Ud Din	DM		0,39,000/-	2013
39	689	Mumtaz Khan S/O Abdus Sumad	Ex Supdt:		0,36,128/-	2013
40	690	Fehmeeda Nasreen D/O Mehmood Khan	HM		0,33,872/-	2013
41	691	Fazal Subhan S/O Saif Ullah Khan	PST		0,30,000/-	2013
42	692	Aman Ullah S/O Jan Muhammad	S/Clerk		0,30,000/-	2013
43	701/586	Ihsanullah S/O Aziz Khan	EDO		64,47,244/- +1,32,000/-	2014/ 2011
44	702	Naseer Ahmad S/O Rashid Ahmad	J/Clerk		2,20,000/-	2014
45	703	Ghazala Tasmeem D/O Muhammad Amir	Asstt:		0,80,000/-	2014
46	704	Muhammad Bashir S/O Ahmad Noor	S/Clerk		1,60,000/-	2014
47	705	Qiasar Muhammad Shah S/O Iftikhar Muhammad Shah	J/Clerk		1,00,000/-	2014
47	706	Abdur Rahim S/O Fazal Ahmad	Ex EDO		1,00,000/-	2014
48	707	Allaud Din Khan S/O Qutab Ud Din	Asstt:		0,97,830/-	2014
49	708	Niamat Ullah S/O Shah Behram	J/Clerk		0,85,475/-	2014
50	709	Muhammad Atiq Qureshi S/O Muhammad Sharif Qureshi	AAO		0,66,889/-	2014
51	710	Aman Ullah S/O Faiz Muhammad	J/Clerk		0,59,532/-	2014
52	712	Shah Nawaz S/O Ghulam Hassan	Supdt:		0,41,927/-	2014
53	713	Amjad Parvaiz S/O Ghulam Jaffar	PST		0,39,600/-	2014
54	714	Muhammad Noman S/O Allaud Din	PST		0,34,507/-	2014
55	715	Muhammad Daud S/O Allaud Din	PST		0,33,000/-	2014
56	716	Waseem Ullah S/O Habibullah	Sweeper		0,30,000/-	2014
57	717	Yasmeen Bibi W/O Zahid Hussain	SST		0,30,000/-	2014
58	718	Gulmast Khan S/O Bala Khan	Chowk:		0,30,000/-	2014
59	719	Ghulam Qasim S/O Muhammad Abdullah	N/Qasid		0,30,000/-	2014
60	720	Mehmood Ahmad S/O Ahmad Khan	J/Clerk		0,30,000/-	2014
61	721	Sardar Ali S/O Attaullah	PST		0,29,000/-	2014
62	722	Abdul Khalid S/O Muhammad Ramzan	PST		0,25,205/-	2014
63	723	Muhammad Javeed S/O Shad Khan	J/Clerk		0,25,000/-	2014
64	724	Fazal Rehman S/O Abdullah Jan	J/Clerk		0,18,051/-	2014
65	725	Muhammad Mirza S/O Malak Ghulam Yaseen	SST		0,17,699/-	2014
66	728	Muhammad Sajid S/O Niaz Muhammad	J/Clerk		1,20,000/-	2014
67	729	Gul Zaman S/O Sher Muhammad	J/Clerk		0,70,000/-	2014
68	730	Nagina Mehraban D/O Mehraban	TT		0,90,000/-	2014
69	731	Hamidullah Baloch S/O Gaman	non		0,22,210/-	2014

  
  
 Head Master  
 G.H.S Potah  
 D. I. Khan

15

70	732	Khan Muqrab Khan S/O Sarfaraz Khan	N/Qasid	0,87,750/-	2014
71	733	Shahid Rizwan S/O Fazal Ahmad	J/Clerk	0,43,953/-	2014
72	734	Karim Bakhsh S/O Ahmad Yar	PST	0,30,000/-	2014
73	744	Allah Nawaz S/O Muhammad Bakhsh	PST	0,50,000/-	2014
74	745	Nadia Rahim D/O Fazal Rahim	AT	0,50,000/-	2014
75	746	Minhaz Begum D/O Muhammad Aslam	EX AT	0,50,000/-	2014
76	747	Alam Zeb S/O Fazal Karim	PST	0,15,000/-	2014
77	748	Abdul Aziz S/O Ghulam Rasool	Ex CT	0,24,000/-	2014
78	777	Ghulam Qasim S/O Khuda Bakhsh	SOM	0,90,000/-	2014
79	778	Karim Nawaz S/O Rab Nawaz	Driver	0,35,000/-	2014
80	779/ 814	Muhammad Farooq S/O Abdul Aziz	PST	0,35,000/-	2015
81	780	Jamshaid Iqbal S/O Rozi Khan	Chowk	1,50,000/-	2014
82	783	Miss Ghulam Fatima	SDEO	0,52,301/-	2014
83	784	Abdul Karim S/O Hakim Khan	SST	0,24,219/-	2014

attest

  
Head Master  
G.H.S Potah  
D. I. Khan

*Supers. Promotion*

*D2*  
*16*



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 31-05-2019

**NOTIFICATION**

No. SO(PE)/E&SED/2-6/DPC Meeting/2019: On the recommendations of the Departmental Promotion Committee (DPC) in its meeting held 17.04.2019, the Competent Authority (Chief Secretary, Khyber Pakhtunkhwa) is pleased to promote the following Forty Nine (49) Assistants/S.S.Stenographers (BPS-16) to the post of Superintendents (BPS-17), on regular basis with immediate effect. Their adjustment/posting is mentioned against their names:-

S.#	Name of Officer & present place of posting	Proposed place of posting	Remarks
1	Tariq parvez, DEO (F) Haripur	Superintendent at DEO (M), Haripur	Against Vacant Post
2	Zahid Khan, GHSS Eidak Miranshah	Superintendent at DEO (M) Tank	Against Vacant Post
3	Azmat Ali, RITE (M) Mardan	Superintendent at SDEO (F) Mardan	Against Vacant Post
4	Ayaz Khan, DEO Mohmand District	Superintendent at SDEO (M) Daggar Buner	Against Vacant Post
5	Mehboob Khan, DEO Orakzai	Superintendent at DEO (M) Hangu	Against Vacant Post
6	Mehboob-Ur-Rehman, DEO(M) Lakki	Superintendent at SDEO (M) Lakki Marwat	Against Vacant Post
7	Ghayasud Din, DEO (M) Shangla	Superintendent at DEO (M) Shangla	Against Vacant Post
8	Fazal Dani, Directorate of E&SE KPK, Peshawar	Superintendent at SDEO (F), Town-1, Peshawar.	Against Vacant Post
9	Muhammad Tariq, SDEO (F) Town-1 Peshawar	Superintendent at SDEO (F) Town-1 Peshawar	Against Vacant Post
10	Muhammad Younis, DEO (M) Manshara	Superintendent at SDEO (M) Manshara	Against Vacant Post
11	Muhammad Younis GHSS Ashkar Kot SWA	Superintendent at DEO (M) D.I Khan	Against Vacant Post
12	Aurangzeb DCTE Khyber Pakhtunkhwa Abbottabad	Superintendent at DEO (M) Battagram	Against Vacant Post
13	Muhammad Ikram DEO (M) Dir Lower	Superintendent at DEO (M) Dir Lower	Against Vacant Post
14	Akhtar Niaz, RITE (F) Bannu	Superintendent at SDEO (M) Bannu	Against Vacant Post
15	Fayaz Ahmad, Directorate of Education (NMTD) Peshawar	Superintendent at oib Additional Director (NMD) Peshawar	Already occupied
16	Rochul Amin, GSAAAHSS No. 1 Jannud Khyber	Superintendent at SDEO (M) Wari Dir Upper	Against Vacant Post
17	Farooq Hameed DEO SWA	Superintendent at DEO (F) Tank	Against Vacant Post
18	Atta Ullah Khan, DEO (M) Kohat	Superintendent at SDEO (F) Hangu	Against Vacant Post
19	Saadullah Jan SDEO (M) Paroa D.I Khan	Superintendent at SDEO (M) Paroa D.I Khan	Against Vacant Post
20	Sikandar Shah DEO (F) Swabi	Superintendent at SDEO (M) Swabi	Against Vacant Post
21	Mujahid Shah SDEO (F) Swabi	Superintendent at SDEO (F) Swabi	Against Vacant Post
22	Nawab Ali DEO (M) Swabi	Superintendent at DEO (M) Swabi	Against Vacant Post

*Alam*  
*Amir*

(17)

23	Hafeez-ur-Rehman SDEO (F) Abbottabad	Superintendent at DEO (F) Battagram	Against Vacant Post
24	Muhammad Farooq (SSS) DCTE Abbottabad	Superintendent at SDEO (M) Battagram	Against Vacant Post
25	Shamsul Qamar DEO (F) Charsadda	Superintendent at DEO (M) Charsadda	Against Vacant Post
26	Syed Noor Akbar DEO (M) Mardan	Superintendent at DEO (M) Mardan	Against Vacant Post
27	Amin Ullah DEO (F) Nowshera	Superintendent at SDEO (M) Nowshera	Against Vacant Post
28	Furshad Ali SDEO (F) Charsadda	Superintendent at SDEO (F) Daggar Buner	Against Vacant Post
29	Muhammad Ismail SDEO (F) Parova D I Khan	Superintendent at SDEO (F) Parova D.I Khan	Against Vacant Post
30	Muhammad Zulqarnain SDEO (F) D I Khan	Superintendent at DEO (F) D.I Khan	Against Vacant Post = MRC
31	Muhammad Nawaz SDEO (F) D I Khan	Superintendent at SDEO (F) D.I Khan	Against Vacant Post
32	Khairur Rahman, SDEO (F) Mastuj Booni Chitral	Superintendent at SDEO (F), Booni, Chitral Upper	Against Vacant Post
33	Samandar Khan, DEO (F) Chitral	Superintendent at DEO (M) Chitral	Against Vacant Post
34	Nisar Ahmad, DEO (M) Swat	Superintendent at DEO (F) Swat	Against Vacant Post
35	Rahim Bakhsh, DEO (M) Peshawar	Superintendent at DEO (M) Peshawar	Already Occupied
36	Nawaz Khan, GGHSS Rustam Mardan	Superintendent at DEO (M) Buner	Against Vacant Post
37	Fazli Qadeem, DEO (F) Mardan	Superintendent at SDEO (M) Topi Swabi	Against Vacant Post
38	Shehzad Gul, SDEO (F) Takhilbai Mardan	Superintendent at DEO (F) Malakand	Against Vacant Post
39	Hazrat Amin, SDEO (M) Babozai Swat	Superintendent at SDEO (M) Babozai Swat	Against Vacant Post
40	Khushdil Khan DEO (M) Peshawar	Superintendent at SDEO (M) Timergara Dir Lower	Against Vacant Post
41	Liaqat Ali, SDEO (F) Malakand	Superintendent at SDEO (M) Malakand	Against Vacant Post
42	Shehzad Humayun, Directorate E& SE KPK Peshawar	Superintendent at DEO (M) Dir Lower	Against Vacant Post
43	Farid Ullah Khan, SDEO (M) Lakki Marwat	Superintendent at SDEO (M) Parova DI Khan	Against Vacant Post
44	Muhammad Tariq, DEO (F) Abbottabad	Superintendent at SDEO (M) Allai Battagram	Against Vacant Post
45	Sher Bahadur Khan, DEO (F) Bannu	Superintendent at SDEO (M) Kulachi DI Khan	Against Vacant Post
46	Shazad Akhtar, DEO (M) Haripur	Superintendent at DEO (F) Kohistan Upper	Against Vacant Post
47	Wali Rehman DEO (M) Bannu	Superintendent at SDEO (M) DI Khan	He will take over charge at SDEO (F) Bannu on 6.7.2019 after the retirement of Umer Khan
48	Zar Khitab, SDEO (M) Swabi	Superintendent at SDEO (F) Lahor Swabi	Against Vacant Post
49	Muhammad Zubair, RITE (F) Abbottabad	Superintendent at DEO (M) Kohistan Upper	Against Vacant Post

CTC

Consequential Transfer In r/o the following Officer is hereby ordered on his own pay & scale in the interest of public service with immediate effect.

S.No.	Name & Design:	Present posting	Posted at	Remarks
1	Javed Abbas Superintendent	SDEO (F) Town-I Peshawar	DEO (F) Peshawar	Against Vacant Post

(18)

2. On their promotion the Superintendents concerned will be on probation for a period of one year, extendable for another one year as specified in Rule-15 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and transfer) Rules, 1989.

SECRETARY

Endst. No. & date as above.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. PSO to Additional Chief Secretary FATA.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director ESRU, Khyber Pakhtunkhwa.
8. The Director Education (Newly Merged Districts), Warsak Road Peshawar.
9. The Deputy Director EMIS, E&SE Department, with the request to upload this notification of E&SE Department website ([www.kpese.gov.pk](http://www.kpese.gov.pk)).
10. The Section Officers (Male/Female), E&SE Department, Peshawar.
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary, E&SE Department.
14. PA to Additional Secretary (Estab), E&SE Department.
15. Officers concerned.
16. Office File.

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SECTION OFFICER (PRIMARY)

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E

## Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

### NOTIFICATION

Consequent upon the recommendation of Departmental Promotion Committee (DPC) in its meeting held on 20-3-2019, the following Junior Clerks (B-11) / Store Keepers (B-7) / ASK (B-6) working in and under the Directorate of E&SE/ DC&TE/ PITE/ NMTD are hereby promoted to the post of Senior Clerks (B-14) on regular basis and posted/ adjusted against vacant post of Senior Clerks (B-14) in the Offices/Institutions as noted against each in the interest of public service with immediate effect: -

S#	Sen#	Name	Father's Name	Design	Present Addr	Proposed Addr
1	85	Bakht Naeem	Muhammad Khan	J/Clerk	GHS Jalal Kot Swabi	GHSS Totakan Malakand
2	88	Saad Ullah Khan	Allah Dad	J/Clerk	GHS Ghandi Umar Dikhan	GHSS Choudwan Dikhan
3	96	Qaisar Muhammad Shah	Iftikhar Muhammad Shah	J/Clerk	GGHS Naivela Dikhan	GHSS Kirij Sharnozal Dikhan
4	100	Noor Ul Islam	Usman Gul	J/Clerk	GGHS Kotlai Kalan Nowshera	Services placed at the disposal of DEO (F) Nowshera for further adjustment
5	103	Jan Bahadar	Said Khan	J/Clerk	GHS Kata Khel Dikhan	GHSS Rehmani Khel Dikhan
6	110	Nisar Khan J/C	Hi/Hussain Khan	J/Clerk	GGHS Muhammad Moina Mardan	GGHSS Manga Mardan
7	151	Afsar Khan	Murtaza Khan	J/Clerk	GGHS Bakri Banda Mardan	GGHSS No 1 Mardan
8	158	Gohar Zaman	Muhammad Ramzan	J/Clerk	GHS Musazai Sharif Dikhan	SDEO(M) Parao Dikhan
9	165	Amjid Rizwan Haidar	Muhammad Ramzan	J/Clerk	GHSS No 2 Dikhan	GHSS No 2 Dikhan
10	174	Dost Mohammad	Sher Zaman	J/Clerk	GGHSS Takht Bhai Mardan	GHSS Kata Khat Mardan
11	181	Inayat Ullah	Allah Wasaya	J/Clerk	GHSS Janta Dikhan	DEO (F) Dikhan
12	206	Jehan Zab	Hanif Khan	J/Clerk	GHSS Khesghi Payan Nowshera	GHSS Khesghi Payan Nowshera
13	207	Zahid Khan	Gohar Rehman Khan	J/Clerk	GGHSS Havelian Abbottabad	GGHSS Noordi Haripur
14	221	Shah Nawaz	Umer Hayat	J/Clerk	GHSS Ghulam-e-Wala Dikhan	GHSS Lar Dikhan
15	233	Saeed Khan	Ali Bahadur Khan	J/Clerk	GGHSS Havelia Abbottabad	GHSS Nara Amazal Haripur
16	258	Samin Akhtar	Abdul Ghafar	J/Clerk	GHS No 6 Dikhan	GHSS Behari Colony Dikhan
17	259	Khuda Bakhsh	Malik Gulab	J/Clerk	GHS Belor Sharif Dikhan	GHS Kirri Khaisor Dikhan
18	277	Tariq Mehmood	Aziz Ahmed	J/Clerk	GGHS Jahangir Abbottabad	GHSS Dalola Abbottabad
19	286	Amir Zeb Khan	Musa Khan	J/Clerk	GHSS Khuzpoor Shangla	Disposal of DEO(M) Shangla
20	311	Muhammad Farooq	Muhammad Ashiq	J/Clerk	GGHSS Kolachi Dikhan	GGHSS Kolachi Dikhan
21	314	Shams Ur Rehman	Abdul Wahab	J/Clerk	GGHS Dhodda Kohat	GHSS Dhand Saghir Kohat

A. S. T. C.



20

22	317	Gul Muhammad Khan	Ghulam Sarwar Khan	J/Clerk	GHS Nokot Mansehra	DEO(M) Kohistan Upper
23	365	Muhammad Jan	Khan Bahadar	J/Clerk	GHS Pajjala Dikhan	GHSS Yarak Dikhan
24	373	Asad Zaman	Zifa Bahader	J/Clerk	GHSS Istamia Swabi	GHSS Adina Swabi
25	383	Abdur Rashid	Muhammad Saeed	J/Clerk	GGHS Sheikhan Kohat	GHSS Churlakal Kohat
26	390	Anwar Zaib J/C	Dilawar Khan	J/Clerk	GHSS Pirsadi Mardan	GHSS Ghanj Dheri Malakand
27	392	Muhammad Akram	Karim Bakhsh	J/Clerk	GHSS Mundava Kalan Dikhan	GHSS Dhala Dikhan

Note:-

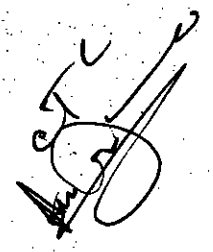
1. Charge report should be submitted to all concerned.
2. They will be on probation for one year, extendable for another term of one year as specified in Rule-15 of Khyber Pakhtunkhwa Civil Servent (Appointment, Promotion and Transfer) Rules 1989.
3. Their enter se seniority will remaind intact with their counterparts promoted vide this office Notificaiton Endst: No. 7665-7860/A-23/MS/Promotion JC to SC/ 2019 dated 19/04/2019.

Dr Hafiz Muhammad Ibrahim  
**DIRECTOR**  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa Peshawar

Endst: No. 281-341/ A-23/MS/Promotion JC to SC/ 2019-II. Dated Peshawar the 29/05/2019.

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

1. Account General, Khyber Pakhtunkhwa Peshawar.
2. Director Curriculum & Teaching Education, Khyber Pakhtunkhwa, Abbottabad.
3. Additional Director of Education (Newly Merged Tribal Districts) Peshawar.
4. Director PITE Khyber Pakhtunkhwa, Peshawar.
5. District Education Officers (Male & Female) concerned.
6. District Account Officers concerned.
7. Principals/ Headmasters/Headmistresses concerned.
8. Sub: Division Education Officers (Male & Female) concerned.
9. Assistant Director (Exam) at PITE Peshawar.
10. Officials concerned.
11. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
12. PA to Additional Director (Estab-II) E&SE Khyber Pakhtunkhwa, Peshawar
13. Master File.



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 29/5/19  
 Deputy Director (F&A)  
 E&SE Khyber Pakhtunkhwa, Peshawar



**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) D.I.KHAN**

No 8520

Dated DIKhan the 27/3/2019

To


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

Subject:- CLEARANCE / NO DEMAND CERTIFICATE

I have the honor to inform you that the undersigned already been submitted the clearance report in respect of Mr. Aman Ullah Junior Clerk of GHS Potah Dera Ismail Khan vide this office No. 17100 dated: 19-05-2018. Copy of the same is enclosed herewith with for ready reference and further proceeding as desire for your good self please.

It is further added that nothing is outstanding against the above named Junior Clerk, hence clearance is being furnished for promotion to the post of Senior Clerk.

  
  
Head Master  
G.H.S Potah  
D. I. Khan

  
District Education Officer (M)  
District Education Officer  
(Male) D.I.Khan

22

F2

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) DIKHAN**

No. 17100 /

Dated DIKhan the 8 / 5 / 2018

To,

The Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa Peshawar.

Subject:- APPEAL FOR PROMOTION AS SENIOR CLERK.

Memo:-


Kindly refer to your letter No. 1547/A-23 dated 07-07-2017 on the subject noted above.

I have the honour to submit that Mr Aman Ullah J/C, now working as GHS Potah has entered in Volunteer return of Rs. 59532/- on the direction of NAB Peshawar vide Challan No. 9287442 dated 05-10-2013. He received a sum of Rs. 59532/- on a/c of MRC himself, honour, he deposited the entire amount into Govt. Exchequer.

It is further added that his promotion to the post of S/Clerk has been stopped due to involvement in NAB but he has returned the amount received voluntarily.

It is, therefore, requested that his case of promotion may please be entertained in the light of verdict of January 2017 Supreme Court of Pakistan.

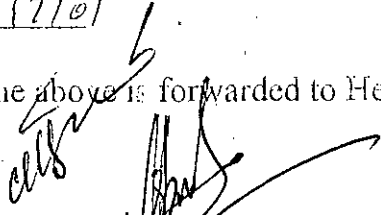
As the undersigned is not competent authority hence his case for promotion to the post of S/C with retrospective effect. May be considered in the interest of Public Service.

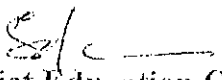
  
District Education Officer  
(Male) Dera Ismail Khan

Endst No. 17101

Dated DIKhan the 8 / 5 / 2018

Copy of the above is forwarded to Headmaster GHS Potah DIKhan for information please.

  
Headmaster  
G.H.S Potah  
D. I. Khan

  
District Education Officer  
(Male) Dera Ismail Khan

The Secretary,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar

(23)

Received 9  
25-6-2019

*Through Proper Channel*

Subject: APPEAL FOR GRANTING PROMOTION AS SENIOR CLERK

Respected Sir,

With profound regards and the best respects I have the honour to submit the following few lines for your kind perusal and sympathetic consideration please:

- 1- That I have been serving the E&SE department in the capacity of Junior Clerk since 29-04-1991 with the entire satisfaction of my superiors and presently working at GHS Potah, DIKhan.
- 2- That most of my colleagues/batch fellows have been promoted to the post of Senior Clerk vide Director, E&SE, Khyber Pakhtunkhwa office order Nos.5018-5218/A-23/MS, dated 30-05-2017, No.281-341/A-23/MS, dated 29-05-2019, No. 4870-82/A-23/MS, dated 30-06-2017 and No.7665-7860, dated 19-04-2019 respectively but have been deprived off from the genuine right.
- 3- That on enquiry it has been told that I have received some amount on account of MRC and the case of said drawl is under investigation in NAB. Peshawar. That is why, my name has been excluded from the list of promotes. The factual story of my MRC is that I received a sum of Rs.59532 which was incurred on my own treatment. On the instructions of NAB authorities (Annex-A) I have refunded voluntarily the entire amount to the Govt: (Annex-B). It is worth mention that some officials highlighted in the attached list (Annex-C) have also been promoted to the post of Superintendent vide notification dated 31-05-2019 issued by your good office although their names were included in the list of NAB enquiry regarding MRC drawl.
- 4- That it has been noticed astonishingly that some officials who received the MRC and their names are also included in the list of NAB have been promoted to the next posts (Senior Clerks and Supdt:), while I have been ignored altogether. Here question arises that how their cases for promotion have been sent to the Director E&SE and the Secretary, E&SED as well and processed although their names are given in the list of NAB along with amounts drawn/received by them?

The names of such officials have been highlighted in the attached lists of NAB Annex-D). Again a question arises that how the No Demand and Non Involvement certificates have been issued to them by the concerned authorities/offices while they were involved in the drawl of MRC.

(24)

5- That it is clearly mentioned in the Article 25 of the Constitution of Islamic Republic of Pakistan that all citizens are equal before law and are entitled to equal protection of law. Some of the promotes were at fault like me but they have been granted chance of promotion to the next post which is a discriminatory action on the part of high ups keeping in view the said article.

As a sequel to what has been explained above it is earnestly requested that the quarter concerned may very kindly be directed to issue my promotion order to the post of Senior Clerk from the due date in order to meet the ends of justice. I do hope that my request will receive favourable action at your hands in the light of law and merit.

Date: 22/06 2019.

Yours Obediently

(Amanullah)  
Junior Clerk GHS Potah, DIKhan

OFFICE OF THE HEADMASTER, GHS POTAH, DIKHAN

Endst. No. 154 /MS

Dated Potah the 22-6 /2019

The appeal of above named J/Clerk of this school is forwarded to the District Ed: Officer (Male) DIKhan for further necessary action please.

Re appeal  
[Signature]  
Head Master  
G.H.S Potah  
D. I. Khan

[Signature]  
22/6/2019  
Headmaster,  
GHS Potah, DIKhan



PIR GHULAM KHAN

Advocate  
bc-18-1199  
Date of issue: December 2018  
Valid upto: December 2021



Secretary  
KP Bar Council

# وکالت نامہ

14

25



بعدالت جناب جج صاحب محترم صدر عدالت ہونے پر خود یا ذریعہ دو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ذریعہ دو برو عدالت حاضر ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پکھری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذگری نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر پٹائی یا راضی نامہ و فیصلہ برخلاف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از پکھری صدر پکھری مقدمہ مزکور نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منسوخی ذگری یک طرفہ یا درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از فیصلہ اجراء ذگری بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ مقررہ دی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل گمرانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

مقدمہ مندرجہ بالا عنوان میں اپنی طرح واسطے بیرون دو برو جواب دہی پیشی یا تصفیہ مقدمہ بنام  
 صاحب موصوف  
 مقدمہ مندرجہ بالا  
 مقدمہ مندرجہ بالا  
 مقدمہ مندرجہ بالا

باعث تحریر آنکہ  
 مقدمہ مندرجہ بالا عنوان میں اپنی طرح واسطے بیرون دو برو جواب دہی پیشی یا تصفیہ مقدمہ بنام  
 صاحب موصوف  
 مقدمہ مندرجہ بالا  
 مقدمہ مندرجہ بالا  
 مقدمہ مندرجہ بالا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سندر ہے  
 مورخہ 15  
 نامہ  
 حضور وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted  
 Samoor Khan Bardi  
 DB Dik  
 15/12/2019  
 حسن کا بیرو مشیر اور دن بین زردار کیت با تقابل جائز ہوں اور اس کا حق

Accepted  
 Adv. Ghulam Khan  
 Dist: Bar Dikhan



MUHAMMAD ANWAR KHAN

Advocate

bc-09-1207

Date of Issue: May 2018

Valid upto: May 2021



Abul Secretary  
KP Bar Council

کورٹ فیس

بعدالت جناب ڈیپٹی سیکرٹری جنرل ایجوکیشن و ٹیکنالوجی گلبرگ اسلام آباد

منجانب قیدہ شہ

قیدہ شہ

دعویٰ یا جرم

سروس اسل

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ڈیپٹی سیکرٹری جنرل ایجوکیشن و ٹیکنالوجی گلبرگ اسلام آباد

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر مظہر حاضر نہ ہوں۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا چھپے یا برو قطنیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا چھپے یا برو قطنیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا برو قطنیل یا پکھری کے اوقات کے آگے چھپے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا ضمانت واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو مرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراءے ذکر کی نظر ثانی اپیل مگرانی و جرم درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ذکری کرانے اور جرم کاروبہ وصول کرنے اور رسید دینے اور داخل کرنے اور جرم کے بیان دینے اور اس پر پاشی یا راضی نامہ دیکھنے پر حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از پکھری صدر پیروی مقدمہ مذکورہ نظر ثانی و اپیل مگرانی و جرم آمد کی مقدمہ یا مشنوشی ذکر کی بطرف یا درخواست حکم اختتامی یا قرتی یا گرفتاری قبل از لیٹلہ اجراءے ذکر کی بھی صاحب موصوف کو بشرط ادائیگی علیحدہ علیحدہ پیروی کا اختیار ہوگا اور تمام ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا مگرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا برو مقرر کرانے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کہ ہر جگہ التوا پڑے گا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پیروی فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو ہر اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

موزہ 29 مارچ 2018ء

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted  
Advocate

Raisees Path

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT D.I.KHAN**

Appeal No. 1371 of 2019

**Mr.Aman Ullah S/o Faiz Mohammad R/o Village Muryali Mohallah Isran Wala,  
Teshil & District Dera Ismail Khan, Junior Clerk Govt. High School Potah, Dera**

**Ismail Khan**

**Versus**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. The Director Education Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male), D.I.Khan.
4. District Accounts Officer, D.I.Khan.
5. Qaier Muhammad Shah S/o Iftekhhar Muhammad Shah, Senior Clerk. Govt. Girls School Naiwela, District DIKhan.

**RESPECTFULL SHEWETH:-**

Para wise comments/reply of respondent No.04 is as under:-

**Para No. 01.**

Incorrect/not admitted Para not related to respondent No.04.

**Para No. 02.**

Incorrect/not admitted Para related to respondent No.02 being administrative matter.

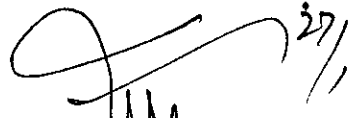
**Para No. 03.**

Incorrect/not admitted Para related to respondent No.04 being administrative matter.

**Para No. 04.**

Reply as Para 03 above.

- a) Reply as Para 03 above.
- b) Reply as Para 03 above.
- c) Reply as Para 03 above.
- d) Incorrect/not admitted Para related to respondent No.02 & 3 being administrative matter.
- e) Reply as Para 04 (d) above.
- f) Reply as Para 04 (d) above.
- g) Incorrect/not admitted Para not related to respondent No.04.
- h) Reply as Para 04 (g) above.

  
**District Accounts Officer,**  
D.I.Khan,  
(Respondent No. 04)



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT D.I.KHAN**

Appeal No. 1371 of 2019

**Mr. Aman Ullah S/o Faiz Mohammad R/o Village Muryali Mohallah Isran Wala,  
Teshil & District Dera Ismail Khan, Junior Clerk Govt. High School Potah, Dera  
Ismail Khan**

**Versus**

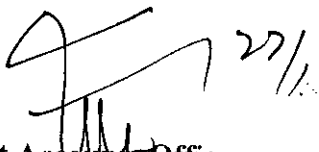
- 1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.**
- 2. The Director Education Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.**
- 3. District Education Officer (Male), D.I.Khan.**
- 4. District Accounts Officer, D.I.Khan.**

**Qaier Muhammad Shah S/o Iftekhar Muhammad Shah, Senior Clerk. Govt. Girls School Naiwela, District DIKhan.**

**AFFIDAVIT**

I, District Accounts Officer, D.I.Khan do here by solemnly affirm and declare on Oath the content of the accompanying Para wise comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.

**DEPONENT**

  
**District Accounts Officer,  
D.I.Khan,  
(Respondent No. 04)**

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 1371 /2109

Aman Ullah

VS

Government of KPK

Index

S No.	Description of documents	Description of annuexure	Page No.
01	Reply of service appeal		1-4
02	Affidavit		5
03	Authority		6
04	Annexure		7-10

  
Respondent No. 03

District Education Officer  
(Male) Dera Ismail Khan

# **Before the Honorable Service Tribunal KPK Peshawar**

**Service Appeal No: 1371/2019**

**Aman ullah**

**vs**

**Govt: of KPK**

## **Comments on Behalf of Respondents No. 1 to 3**

### **Respectfully Sheweth.**

#### **Preliminary Objections**

1. That the appellant has no got no cause of action / locustandi.
2. That the appellant has not come to the honorable tribunal with clean hands.
3. That the appellant has filed the service appeal on malafide objectives.
4. That the instant appeal is against the prevailing laws and rules.
5. That the appeal is barred by doctrine of laeches.
6. That the instant appeal is illegal and against facts.
7. That the service appeal is not maintainable in its, present form.
8. That the appellant has concealed the material facts from the honorable tribunal.
9. That the service appeal is against ground facts.

#### **Para-wise Reply.**

1. That the para pertains to the service history of appellant, hence no comments.
2. Para pertains to the promotion orders of the post of junior clerk to senior clerk.
3. Para pertains to the promotion of respondents NO.5 from post of junior clerk to senior clerk and pertains to record, hence no comments.
4. Para pertains to the promotion of respondent NO.5 from post of junior clerk to senior clerk Mr. Qaisar Muhammad Shah. But the respondent NO.5 has refused this promotion due to heart disease and by pass operation which is enclosed as annexure A.
  - a. Para pertains to the MRC and treatment bills hence no comments.
  - b. Para pertains to the NAB authorities hence no comments.
  - c. As started is incorrect, hence denied.
  - d. Incorrect / not admitted. As the appellant pray is that to promote him from the post of junior clerk BPS – 11 to post of senior clerk in BPS – 14 so the department has given him promotion by Endst: NO. 931290 – 931370 on dated 15 /02/2021. So the appellant has got promotion. His grievance are redressed annexure (B). As appellant has been promoted, so his number of seniority list and his MRC bills are not debatable.
  - e. Pertains to record.
  - f. Instant appeal is not maintainable and barred by the law.
  - g. As replied in Para d ibid.

- h. That the counsel for respondents may kindly be allowed to raise additional ground, at the time of arguments.

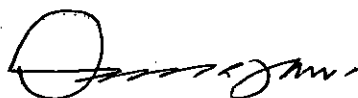
## Prayers

As the appellant has got the promotion from the post of junior clerk BPS - 11 to senior clerk in BPS - 14. His grievances are redressed .

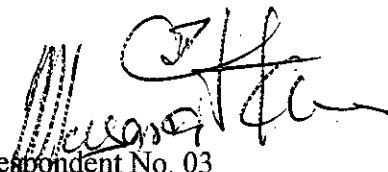
So it is humbly prayed that the appeal of appellant may kindly to dismissed.



Respondent No. 01  
The Secretary E&S E  
KPK Peshawar



Respondent No.02  
The Director E&S E  
KPK Peshawar



Respondent No. 03  
District Education Officer  
(Male) Dera Ismail Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 1371/2109

Aman Ullah

VS

Government of KPK

**Affidavit**

I Mr: Muhammad Kamran Khan ADEO Litigation (M) D.I.Khan do solemnly affirm and declare on oath that contents of written reply are correct to the best of my knowledge and nothing has been concealed from this honorable Court

  
Deponent

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No: 1371/2109

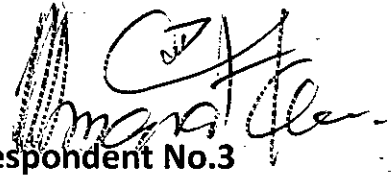
Aman Ullah

VS

Government of KPK

### Authority

I District Education Officer (M) D.I.Khan do hereby authorized Mr: Muhammad Kamran Khan to attend the honorable Service Tribunal KPK Peshawar on behalf of respondent in connection with submission para wise comments till the decision of service appeal.



Respondent No.3

District Education Officer

(M) D.I.Khan

NOTICE (1) - The Post Office is not responsible for loss or damage in the case of inland articles, unless they are also...

A

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
DERA ISMAIL KHAN**

No. 35 /

Dated DIKhan the 26<sup>th</sup> July, 2019

To,

The District Education (Female)  
Dera Ismail Khan.

SUBJECT: REFUSAL

Memo: Reference E/SED Pesh: No. 5083-84 Dated: 23/07/2019.

Enclose please find herewith the refusal of Qaiser Muhammad Shah  
J/Clerk of this office on stamp. Paper is submitted for your kind information and  
on ward submission to quarter concerned.

PRINCIPAL  
GGHSS Naivella  
D.I.Khan  
G.H.S. Naivella  
D.I.Khan

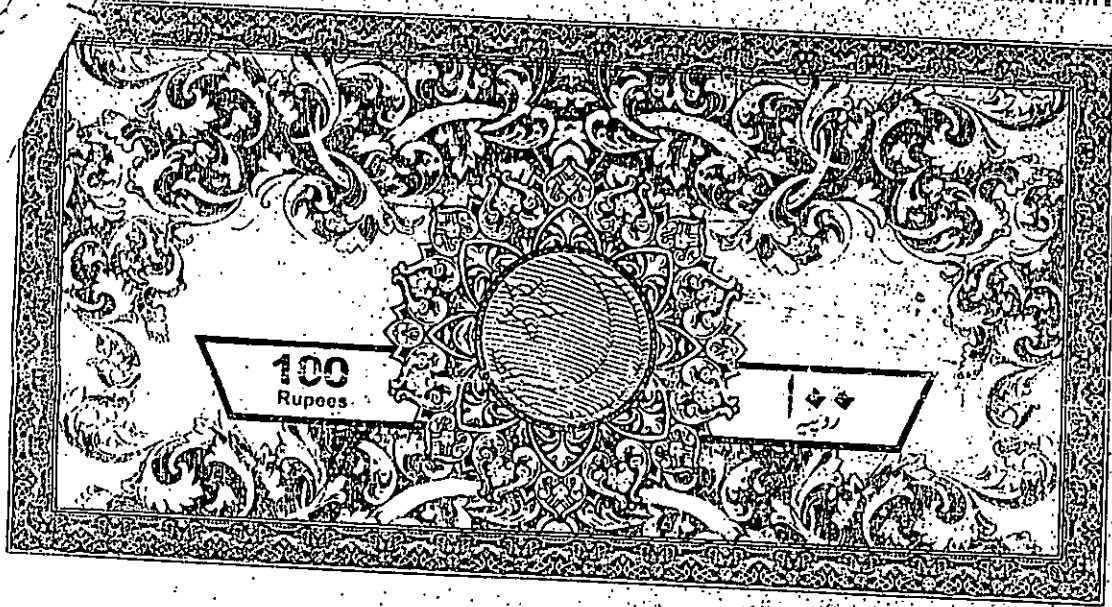
Enclst No. 36

Dated: 26-07-2019

Copy for information to the honorable Director  
(E/SED) KPK Peshawar.

PRINCIPAL  
GGHSS Naivella  
D.I.Khan  
G.H.S. Naivella  
D.I.Khan

477022



To,

The Director (E/SED) KPK  
Peshawar

THROUGH PROPER CHANNEL CLAIMS  
SUBJECT: ACCEPTANCE OF REFUSAL

Respected Sir,

Kindly refer to your office Endstt: No.5083-84 dated 23/7/2019.

It is submitted that for your kind information that the applicant is patient of Heart decease and bypass operation made during the years 2014 now the applicant is promoted as S/Clerk (BPS-14) vide your notification No.281-341 dated 29/5/2019 but due my illness and other unavoidable circumstances.

The applicant not in position to avail to saved promotion.

You are earnestly requested to kindly accept my refusal under intimation to all concern please your kind Co-operation in till regard will be highly appreciated please.

Your's Obediently

Qaisar Muhammad Shah  
S/o Iftekhar Muhammad Shah  
Junior Clerk GGHS Naivela  
DIKhan

Dated 26-07-2019



26/7/19





B

### NOTIFICATION

Consequent upon the recommendation of Departmental Promotion Committee (DPC) in its meeting held on 17-09-2020, the following Junior Clerks (B-11) working in and under the Directorate of E&SE/ DC&TE/ PITE/ NMTD are hereby promoted to the post of Senior Clerk (B-14) on regular basis and posted/adjusted/shuffled against vacant post of Senior Clerk (B-14) in the Offices/Institutions as noted against each in the Interest of public service with effect from the charge assumption of the newly promoted Assistants: -

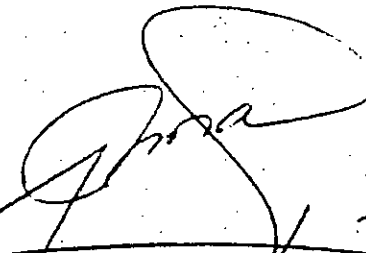
Ser No	Name	Father's Name	Present station	Proposed	Remarks
1.	M/Zul Zareen	Muhammad Miskeen	GHS Kantlali Abbottabad	DCTE Abbottabad	A.V.P
2.	Abdul Jameel	Abdul Bari	GHSS Olandar Shangla	DEO Female Shangla	A.V.P
3.	Abdullah Khan	Muhammad Shah	SDEO (F) Takhti Nasrati Karak	SDEO (F) Takhti Nasrati Karak	A.V.P
4.	Alamzeb	Subhanuddin	GHS Azam Warsak SWTD	Service placed at the disposal of DEO SWTD for further adjustment.	
5.	Irshad Ahmed	Mufariq Shah	GGHS Gulbahar Peshawar	GGHS Gulbahar Peshawar	A.V.P
6.	Matiullah	Habibullah	GHS Khecha sub Div Jandola Tank	DEO Female Tank	A.V.P
7.	Shah Nawaz Khan	Haji Danish	GGHSS Civil Colony Peshawar	Directorate NMD Peshawar	A.V.P
8.	Miranshah	Muhibullah	GHS Pir Tangi Sub Div: Jandela Tank	DEO Female Tank	A.V.P
9.	Muhammad Ismail	Muhammad Qahar	GHSS Shapur Shangla	GHSS Shapur Shangla	A.V.P
10.	Mumtaz Ali	Shamsul Qamar	GHS Asota Sharif Swabi	DEO (F) Swabi	A.V.P
11.	Amir Ullah Khan	Muhammad Zar Ali Khan	GHS Sedghi Many Khan SDW Bannu	GHSS Domel Bannu	A.V.P
12.	Sher Ali Khan	Gulab Shah	GGHS Thrail Dir Lower	SDEO Female Samar Bagh Dir Lower	A.V.P
13.	Sharifullah	Sher Ghazi Khan	GHS Shagram Chitral Upper	GHSS Shagram Chitral Upper	A.V.P
14.	Rahmat Illahi	Zindagani	GGHS Mustuj Chitral Upper	Service placed at the disposal of DEO (F) Upper chitral for further adjustment	A.V.P
15.	Hassan Gul	Zarin Gul	GHSS Mali Khel Bala Nowshera	GHSS Mali Khel Bala Nowshera	A.V.P
16.	Noor Zali Khan	Nazr Ali Khan	GGHS Bazar Ahmad Khan Bannu	GGHSS No.2 Bannu	A.V.P
17.	Fazal Rehman	Jabbar Khan	DEO Male Kohat	GHSS Muslim Abad Kohat	A.V.P
18.	Bulbul Aziz	Ali Rahmat	GGHS Booni Chitral Upper	DEO Female Upper Chitral at Booni	A.V.P
19.	Aman Ullah	Faiz Muhammad	GHS Potah DIK	GHSS No.2 DIKhan	A.V.P

931290-931370

Inst: No. \_\_\_\_\_ / A-23/MS/Promotion JC to SC/ 2020. Dated Peshawar the 15/02/2021

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

1. Account General, Khyber Pakhtunkhwa Peshawar.
2. Director Curriculum & Teaching Education, Khyber Pakhtunkhwa, Abbottabad.
3. Additional Director of Education (Newly Merged Tribal Districts) Peshawar.
4. Director PITE Khyber Pakhtunkhwa, Peshawar.
5. District Education Officers (Male & Female) concerned.
6. District Account Officers concerned.
7. Principals/ Headmasters/Headmistresses concerned.
8. Sub: Division Education Officers (Male & Female) concerned.
9. Officials concerned.
10. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
11. Master file.

  
Assistant Director (Admn)  
E&SE Khyber Pakhtunkhwa, Peshawar  
15/2/2021



**KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

No. 2378 /ST

Dated: 02/12 /2021

All communications should be  
addressed to the Registrar KPK Service  
Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262


To

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

Subject: JUDGMENT IN APPEAL NO. 1371/2019 MR. AMAN ULLAH.

I am directed to forward herewith a certified copy of Judgement dated  
11.11.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR