Service Appeal No 1875/2023 titled "Muhammad Ibrahim versus The Director Elementary & Secondary Education Klivber Pakhtunkhwa, Peshawar and others", decided on 22.01.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Salah-Ud-Din, Member Judicial, Khyber Pakhtunkhwa Service Tribunal, Peshawar

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

BEFORE: KALIM ARSHAD KHAN ... CHAIRMAN SALAH-UD-DIN ... MEMBER (Judicial)

Service Appeal No.1875/2023

Date of presentation of Appeal	
Date of Hearing	
Date of Decision	

Mr. Muhammad Ibrahim, Senior Qari (BPS-15), GHSS Drosh, District Chitral Lower.(Appellant)

<u>Versus</u>

- 1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2. The District Education Officer, District Chitral Lower.
- 3. Sultan Ahmad Shah, Senior Qari, GHS Ayun, District Chitral Lower.

Present:

JED

k 3T esnawar

Page

Mr. Noor Muhammad Khattak, AdvocateFor the appellant Mr. Muhammad Jan, District Attorney....For official respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SENIORITY LIST PREPARED FOR THE CADRE OF SENIOR QARIS WHEREBY PRIVATE RESPONDENTS NO.3 & 4 BEING JUNIOR TO THE APPELLANT HAS BEEN PLACED/ENLISTED IN THE IMPUGNED SENIORITY LIST AS SENIOR TO THE APPELLANT IN VIOLATION OF LAW & RULES AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Appellant has challenged the

seniority list of the cadre of Senior Qaris on the grounds that he and the private

respondents were appointed on the same date and in the appointment order,

Service Appeal No.1875/2023 titled "Muhammad Ibrahim versus The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others", decided on 22.01.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Salah-Ud-Din. Member Judicial, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

the appellant was placed at Serial No.1, which meant that he was at the top of the people appointed along him.

<u>2.</u> In the memorandum of appeal, he contended that on 22.07.2014, the department had promoted the junior colleagues of the appellant as Senior Qaris by violating the merit order and seniority of the cadre; that the appellant was promoted to the post of Senior Qari vide order dated 18.11.2014. He claimed that in the impugned seniority list, the appellant was placed junior to the private respondents, ignoring the merit position of the appellant; that he filed departmental appeal; that on 05.09.2023, a meeting of the Departmental Promotion Committee was scheduled for promotion of Senior Qari alongwith other cadres, wherein, the respondents recommended private respondent No.4 for the post of SST (General). That the appellant moved representation for correction of the impugned seniority list and to be considered for promotion to the post of SST (General), hence, this appeal.

3. The respondents were put on notice. Private respondents were placed ex-parte, while official respondents admitted that the appellant was at Serial No.1 in the appointment order but the seniority was not reckoned from serial number of the appointment order rather was prepared as per a prevalent rule (date of taking over charge). It was contended that the Department had promoted the Qaris from BPS-12 to BPS-15 vide office order dated 22.07.2014 but the appellant had not filed any appeal against the promotion in the parent department nor filed petition in the judicial forum during the last

14 years and relied on the seniority list.

Service Appeal No.1875/2023 titled "Muhammad Ibrahim versus The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others", decided on 22.01.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Salah-Ud-Din, Member Judicial, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

4.We have heard learned counsel for the appellant and learnedDistrict Attorney for official respondents.

The appellant has annexed a list as "Annexure-D" with his appeal <u>5.</u> showing the same to be seniority list, but it is neither signed by anyone nor is it clarifying as to what cadre it pertained to. Similarly, date of issuance of the seniority list is also not given in the list nor is it mentioned thereon whether it was a provisional/tentative or final seniority list. When it was circulated? Whether objections were invited? Whether it was gazetted? None of the above questions could be answered from the list annexed and relied upon by the appellant, therefore, the list cannot be said to be a seniority list within the meaning of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 and the relevant rules. It appears that the respondents have got copy of the list annexed by the appellant with the appeal and the said copy was then annexed with their reply. The District Education Officer (Male) Chitral Lower is present in the Tribunal and when asked about, he did not know anything about the list or method of its preparation, issuance of tentative/provisional seniority list and seeking objections thereon to finalize it in accordance with law and rules. Therefore, we cannot hold that list annexed by the appellant or by the respondents was a proper seniority list. Section-8 of the Khyber Pakhtunkhwa Givil Servants Act, 1973 and Rule-17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 tell us as to how the seniority is determined and how it is to be circulated and gazetted each year. In the present case we got no assistance from the respondents' side nor could the DEO Chitral Lower himself was clear. This is highly irresponsible

Service Appeal No.1875/2023 titled "Muhammad Ibrahim versus The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others", decided on 22:01.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Salah-Ud-Din, Member Judicial, Khyber Pakhtunkhwa Service Tribural, Peshawar.

act on the part of the respondents because valuable rights of the civil servants are being dealt with in a very casual manner.

6. Therefore, we direct the official respondents to adopt the procedure under the law and rules for issuance, proper circulation and finalizing the seniority lists each year. The first list be issued in this month as required by the law and rules. Any person feeling aggrieved of any such list prepared has every right to challenge it in accordance with law and rules. Disposed of in the above manner. Copy of this judgment be sent to the Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar. Consign.

<u>7.</u> Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 22nd day of January, 2024.

SCANNED KPST Peshawar

Mniazem Shah

li

KALIM ARSHAD KHAN Chairman

SALAH-UD-DIN Member (Judicial) ORDER 22nd Jan. 2024

1. Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Mr. Mehmood Ghaznavi, District Education Officer (Male) Lower Chitral for official respondents present.

2. Vide our detailed judgment of today, placed on file, we direct the official respondents to adopt the procedure under the law and rules for issuance, proper circulation and finalizing the seniority lists each year. The first list be issued in this month as required by the law and rules. Any person feeling aggrieved of any such list prepared has every right to challenge it in accordance with law and rules. Disposed of in the above manner. Consign.

3. Pronounced in open Court at Peshawar under our hands and

seal of the Tribunal on this 22nd day of January, 2024.

(Salah Ud Din)

Member (J)



Mutazem Shah

(Kalim Arshad Khan

Chairman

SA 1875/23

04.01.2024 01. Junior to counsel for the appellant present. Mr. Habib Anwar, Addl. AG alongwith Ahmad-ud-Din, ADEO (M) for the respondents present.

> 02. Former requested for adjournment due to nonavailability of learned counsel for the appellant today. Last opportunity is granted. To come up for arguments on 10.01.2024 before the D.B. Parcha Peshi given to the parties.

(FAREEHA'PAUL) Member(E)

(RASHIDA^NBANO) Member (J)

10.01.2024

CANNED KPST Peshawar

ENENSO,

Fazle Sybhan \P.S

Appellant alongwith his counsel present. Mr. Ahmedud-Din, ADEO (M) alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 22.01.2024 before the D.B. Parcha Peshi given to the <u>parties</u>.

(Fareeha Paul) Member (E)

(Salah-ud-Din) Member (J)

Naeem Amin

Learned counsel for the appellant and Mr. Asad Ald han, Dec. 2023 1

Assistant Advocate General for the respondents present.

Reply has been submitted through office. To come up for 2. arguments on 21.12.2023 before D.B. P.P given to the parties.

> (Kalim Arshad Khan) Chairman

21.12.2023

Mutazein Shah

Counsel for the appellant present. Mr. Asif Masood, Ali 01. Shah, DDA alongwith Muhammad Ghaznavi, DEO for the respondents present.

Miss Farecha Paul, learned Member (Executive) is on 02. To come up for leave, therefore, Bench is incomplete. Parcha Peshi given arguments on 04.01.2024 before the D.B. to the parties.

MY YM HA

(RASHIDĂ BANO) Member (J)

*Fazle Subhan, P.S

SCAMNED KRSTED

eshawar



1. Appellant in person and Mr. Habib Anwar, Additional Advocate General alongwith Mr. Fardad Ali Shah, ADEO for official respondents present. Nobody present on behalf of private respondenst No.3 & 4, hence, placed ex-parte.

2. Reply on behalf of respondents is still awaited. Representative of official respondents requested for time to submit reply/comments.
 Granted by way of last chance. To come up for reply/comments on KPST
 Peshawe22.11.2023 before S.B. P.P given to the parties.

(Kalim Arshad Khan) Chairman

22.11.2023 1.

*Mutazem Shah

1. Clerk of counsel for the appellant present. Mr. Asad Ali Khan learned Assistant Advocate General alongwith Imran, Assistant for respondents present.

2. Despite last chance written reply on behalf of respondents not submitted. Representative of respondent seeks further time for submission of written reply. Last chance is extended on payment of cost of Rs. 2000/-. To come up for written reply on 14.12.2023 before S.B. P.P given to the parties.

(Rashida Bano) Member (J)



*KaleemUllah`

Learned counsel for the appellant present and argued that 1. appellant was appointed Qari vide order dated 24,02.2009 and placed at serial No. 1 of the appointment order of merit position. Later on Sultan Ahmad Shah who was at serial No. 5 of the merit was promoted as Senior Qari vide order dated 22.08.2014 by ignoring appellant being at top of merit list. Subsequently, appellant was promoted as Senior Qari vide order dated 18.11.2014. Seniority list of Senior Qari were issued in the year 2022 and appellant was shown junior to Ahmad Shah and Abdul Saboor which is violation of Rule 17 of (Appointment, Promotion and Transfer) Rules, 1989 and Section 8 of Civil Servants Act, 1973 because appellant will regain his inter-se-seniority with his batch mates in accordance with the above mentioned rule. Appellant filed departmental appeal on 24.05.2023, which was not respondent within statutory period of ninety days, hence instant service appeal. Learned counsel for the appellant further argued that that during pendency of departmental appeal respondents prepared working paper for promotion to BPS-16 wherein name of private respondent mentioned at serial No.1 by ignoring appellant. Points raised need consideration, therefore, appeal is admitted for regular hearing subject to all legal objections. Appellant is directed to deposit security fee within 10 days. Thereafter, notices be issued to respondents for submission of written reply/comments. Respondents be summoned through TCS the expenses of which be deposited by the appellant within 3 days. Adjourned. To come up for written reply/comments on 14.11.2023 before S.B. P.P given to learned counsel for the appellant.

2. Annexed with the appeal there is an application for restraining the respondents from issuing recommendation and promotion order of respondent No. 3. Notice of this application be ssued to the respondents. In the meanwhile, respondents are restrained from promotion of respondent No. 3, till the disposal of instant appeal.

> (Rashida Bano) Member (J)

14

*KalcemUllah

30.10.2023

FORM OF ORDER SHEET

Court of -

Appeal No.

1875/2023

Date of order S.No. proceedings 1 2

20th Sept. 2023

awa

pes

18/09/2023

1-

Order or other proceedings with signature of judge

appeal of Mr. Muhammad Ibrahim The presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 20.09.2023. Parcha Peshi is given to the counsel for the appellant.

3

REGISTRAR Junior of learned counsel for the appellant present and requested for adjournment as learned counsel for the appellant

By the order of Chairman

was busy before the Hon'ble Peshawar High Court today. Adjourned. To come up for preliminary hearing on 30.10.2023 before the S.B. Parcha Peshi given to junior of learned counsel for the appellant.

(FAREEHA PAUL) Member (E)

Fazle Subhan, P.S

01.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Case	Title: Mi ibrahim v/s Edemontry	durat	in De
S#	CONTENTS		·
1	This Appeal has been presented by:	YES	NO
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	~	
3	Whether appeal is within time?	~	
4	Whether the enactment under which the appeal is filed mentioned?		
5	Whether the enactment under which the appeal is filed is correct?		
6	Whether affidavit is appended?	\checkmark	
7	Whether affidavit is duly attested by competent Oath Commissioner?		
8	Whether appeal/annexures are properly paged?	✓ ✓	
	Whether certificate regarding filing any earlier appeal on the subject, furnished?	 عد	~
10	Whether annexures are legible?	~	
	Whether annexures are attested?	~	-
	Whether copies of annexures are readable/clear?	· ·	
13	Whether copy of appeal is delivered to AG/DAG?		
۱ A	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	× ✓	
15	Whether numbers of referred cases given are correct?	-	[
16 \	Whether appeal contains cutting/overwriting?	×	~~
17	Whether list of books has been provided at the end of the appeal?		
18 \	Whether case relate to this court?	· ·	
19 \	Whether requisite number of spare copies attached?	\checkmark	
	Whether complete spare copy is filed in separate file cover?	✓ ✓	
21 V	Whether addresses of parties given are complete?	✓ ✓	
22 V	Whether index filed?	V	
	Whether index is correct?	✓ ✓	
· · · · · · · · · · · · · · · · · · ·	Whether Security and Process Fee deposited? On	✓ ✓	
	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974	·	
15 F	Rule 11, notice along with copy of appeal and annexures has been ent to respondents? On	~	
	Whether copies of comments/reply/rejoinder submitted? On		
7 V 7 P	Vhether copies of comments/reply/rejoinder provided to opposite party? On	~	

It is certified that formalities/documentation as required in the above table have been fulfilled.

t

Sec. Sec. 20

Name:

Signature Dated:

BEFORE	E THE KHYB		HTUNKHW	<u>A SERVICE</u>	Pesha TRIBUNAL,	w
	1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	PES	HAWAR.		с. К. –	
~ *	APPEAL	NC)	_/2023		
M. Ibrahim		VS	GOVT	ОҒ КРК		

KPST

APPLICATION FOR FIXATION OF THE ABOVE TITLED APPEAC AT PRINCIPAL SEAT, PESHAWAR

Respectfully Sheweth:

1.

3.

That the above mentioned \underline{APPEAL} is pending adjudication before this Hon`ble Tribunal in which no date has been fixed so far.

2. That according to Rule 5 of the Khyber Pakhtunkhwa Service Tribunal Rules 1974, a Tribunal may hold its sittings at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matares are to be heard.

- That it is worth mentioning that the offices of all the respondents concerned are at Peshawar and Peshawar is also convenient to the appellant/applicant meaning thereby that Principal Seat would be convenient to the parties concerned.
- 4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble tribunal.

It is therefore prayed that on acceptance of this application the appeal may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Appellant/Applicant

Dated: 19/23

Through

NOOR MOHAMMAD KHATTAK ADVOCATE SUPREME COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

ANNED

est

APPEAL NO. 1875 /2023

Mr. Muhammad Ibrahim.....Appellant

VERSUS

Elementary & Secondary Education & others......Respondents

INDEX

	· · · · ·		
S.NO.	DOCUMENTS	ANNEX	PAGE
í.	Memo of appeal with Affidavit		1-4
2.	Application for suspension	· · ·	5
3.	Copies of the order dated 24/02/2009	A	6
4.	Copy of the order dated 22/07/2014	В	7
5.	Copy of order dated 18/11/2014	С	8-9
6.	Copy of the impugned sonority list	• D	10
7.	Copy of departmental appeal	ΕΕ	11
8.	Copies of educational testimonials	F	12-19
9.	Copy of the minutes of the meeting	G	20-21
10.	Copy of the application/representation	H	22-23
11.	Vakalatnama		24

-- Dated: 13/09/2023

APPELLANT

Muhammad Ibrahim

THROUGH:

NOOR MOHAMMAD KHATTAK Advocate Supreme Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1875 /2023

7603 18/09/23

Mr. Muhammad Ibrahim, Senior Qari BPS-15, GHSS Drosh, District Chitral Lower.

...... APPELLANT

VERSUS

- 1- The Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- **2-** District Education Officer, District Chitral Lower.
- 3- Sultan Ahmad Shah, Senior Qari, GHS Ayun, District Chitral Lower.

Abdul Saboor Khan, Senior Qari, GHS Birga Nisar, District Chital Lower. RESPONDENTS

·

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SENIORITY LIST PREPARED FOR THE CADRE OF SENIOR QARI'S WHEREBY PRIVATE RESPONDENTS NO.3 AND 4 BEING JUNIOR TO THE APPELLANT HAS BEEN PLACED/ENLISTED IN THE IMPUGNED AS SENIOR TO THE APPELLANT IN VIOLATION OF LAW & RULES AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned final seniority list of senior Qari's for the year 2022 may very kindly be modified/rectified to the extent of the appellant and private respondents and the respondents may kindly be directed to place/enlist the appellant at the right position in the impugned seniority list as per law & rule. Any other remedy which this august Tribunal deems fit, may also be awarded in favor of the appellant.

R/SHWETH: ON FACTS: ÷

- That the respondent department vide order <u>dated 22/07/2014</u>, promoted the junior colleagues of the <u>appellant</u> as Senior Qaries BPS-15 by violating the merit order and <u>seniority</u> of the said cadre. Copy of the order dated 22/07/2014 is attached as annexure.
- **3.** That the appellant was also promoted to Senior Qari by the respondent vide order dated 18/11/2014. Copy of order dated 18/11/2014 as annexure......**C**.
- **4.** That it is pertinent to mention here that the respondent department issued the impugned seniority list, whereby the private respondents were placed/mentioned_as_senior to the appellant by ignoring the merit position of the appellant, where the appellant was place at the top of the said order. Copy of the impugned sonority list is attached as annexure......D.
- **5.** That the appellant is aggrieved from the impugned seniority, preferred department appeal, which was not decided till date. Copy of departmental appeal is attached as annexure......**E**.
- 6. That the appellant was eligible to be promoted to the post of Senior Qari and the respondent department have also the vacant seat of Senior Qari, but ignored the appellant from promotion. Copies of educational testimonials are attached as annexure.
 F.
- 7. That the respondent department vide dated 05/09/2023, scheduled DPC meeting for the promotion of Senior Qari alongwith other cadres, whereby the respondents recommended private respondent No 4 for the post of SST (G) by violating the merit order and ignored the appellant being senior to the said respondent. Copy of the minutes of the meeting is attached as annexure.

9. That feeling aggrieved from the action and inaction of the respondent, the appellant having no other remedy filed the instant appeal on the following grounds amongst the others.

GROUNDS:

- A- That impugned seniority list issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/rectified.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That, the treatment meted out to the appellant is clearly based on discrimination and malafide and as such the respondents violated the principle of natural justice.
- D- That the impugned seniority list is violative of section-8 of the Civil Servant Act, 1973 read with rule-17 of the APT Rules, 1989.
- E- That due to the ibid impugned seniority list junior to the appellant i.e. private respondent No.3 is going to be promoted to the post5 of SST by the respondents.
- F- That the respondents acted in arbitrary and malafide manner while issuing the impugned orders dated.
- G- That respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973, according to which state is bound to eliminate disparity in the income and earning of individuals including persons in the services of the Federation, thus in light of the above quoted Article the respondents are duty bound to promote the appellant to the post of SST (G).
- H- That the appellant is the most senior amongst the private respondents, which is clear from the merit order of the appellant as well as his colleagues.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT Muhammad Ibrahim

THROUGH: NOOR MOHAMMAD KHATTAK Advocate Supreme Court

UMAR FAROOQ MEHMOOD JAN MUHAMMAD AYUB

WALEED ADNAN ADVOCATE

Affidavit:

Stated on oath thet the Contects of the Service Appleed are true and correct to the best of knowledge and nothing concelered from this howsble tribund. Mile. Deponeet.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO._____/ 2023

Mr. Muhammad Ibrahim..... Appellant

VERSUS

Elementary & Secondary Education & others Respondents

APPLICATION FOR RESTRAINING THE RESPONDENTS FROM ISSUING RECOMMENDATION AND PROMTION ORDER OF THE PRIVATE RESPONDENT NO.3

R/SHEWETH:

- 1- That the above-mentioned appeal along with this application has been filed before this August Service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above-mentioned Service Appeal against the impugned seniority list whereby his seniority has been placed at wrong position.
- 3- That all the three ingredients necessary for the stay is in favor of the applicant.
- 4- That the impugned seniority list had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained from making/issuing promotion order of the private respondent No.3 to the post of SST (G) till the disposal of the instant service appeal.

Dated: 13/09/2023

APPELLANT Mkne.

Muhammad Ibrahim

NOOR MOHAMMAD KHATTAK Advocate Supreme Court

THROUGH:

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S E CHITRAL

On the recommendation of Departmental Selection Committee in its meeting held on 17.2.2009, appointment of the following Qaries (Male) is hereby ordered in BPS-7 (3530-190-9230) plus usual allowances as admissible under the rule with effect from their taking over charge (but not prior to 1.3.2009), in the best interest of public service, subject to the terms and conditions noted below:

S No.	Name and parentage	address .	Merit order	Place of posting	Remarks
ⁿ V	Mohammad Ibrahim S/O Rahim Khan,	Bcori	1	GHS Madaklashi	A.V.P
<u>}</u>	Attaullah S/O Abdul Qadir.	Gahirat	2	GHS Shoghor	A.V.Post
3	Fazle Rabbi S/O Wazir Khan	Parpish -	4	GHS Moroi	A.V.Post
4.	Abdus Saboor Khan S/Q Sahib Noor Khan.	Shishikoh	5	GHS Birganisar	A.V.Post
<u>シ</u>	Sultan Ahmad Shah S/O S.Ahmad Shah.	Ayun	6	GHS Domil	A.V.Post
6	Ashrafud Din S/O Aziz Murad,	Werkup	7	GHS Rech	A.V.Post
7	Mirza Wali S/O Illafud Din	Ксзи	8	GHS Sonoghor	A.V.Post
8	Najeemud Din S/O Mir Abdul	Khoi	9	GHS Brep	A.V.Post
"	Mohammad Tahir S/O Fazel Qayum	Mustajapan- dch	69/Deceased cmp: son	GHS Arkari	A.V.Post

TERMIS AND CONDITIONS

1. Their appointment is purely temporary and they are liable to termination at any time.

2. They will be governed by such rules/regulations issued by the Government from time to time.

Their service will be considered as regular but without pension/gratuity in terms of section 19 of the NWPT Civil servants ACT 1973 as amended by NWPP Civil servants amendment ACT 2005.

1 They will contribute towards CP bund at the prescribed rate & contribution at the same rate will be made by the Government in fice of pension.

5. The fresh candidates should produce Health & Age certificate from the MS DIIQ Hospital Chilral.

6. Their appointment is subject to verification of Degrees/Certificates/Asnads from the concerned Universities/Boards/Institutions, which is already in process. Any disinformation detected later-on will result to their termination from service.

7. They will be on probation for a period of two years.

S. Charge reports should be submitted to all concerned.

They should take over charge within 15 days after 1.3.2009 (This order will be effective w.e.f. 1.3.2009), otherwise their appointment will stand automatically cancelled.
 Hitters for transfer before completion of normal tenurs and impulsible in detauntil will stand automatically cancelled.

- 0. Efforts for transfer before completion of normal tenure and irregularity in duty will result to their disqualification for further service. The appointees should produce an affidavit on stamp paper in this regard.
- In case of any deficiency in posts being filled up the appointment of candidate with lesser merit will stand automatically cancelled.
- 12. If age of any fresh candidate exceeds 36 years (including 3 years for back ward area), he may not be handled over charge unless and until he produces sanction to the age relaxation from the competent authority.

ads. No. 77

E&S Education Chiltral. /EB/Secy/A-3. dated Chitral. the 24/2-12009.

Copy of the above is forwarded for information to thes-

ATTESTED to be true Copy

- I. District Nazim Chitral.
- 2. District Coordination Officer Chitral.
- 3. District Accounts Officer Chitral.
- 4. Principals/HM concerned.
- Middle sections (M&F) local office
- 6. Candidates concerned.

Executive District Office ESIS Education Chitral

(SAMAD GUL) Executive District Officer

<u>BETTER COPY OF THE PAGE NO. 6</u> OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S E CHITRAL ORDER

On the recommendation of Departmental Selection Committee in its meeting held on 17.2.2009, of the following Qaries (Male) is hereby ordered in DS-7(3530-190-9230) plus usual allowances as admissible the sale with effect from their taking over charge (but not prior to 1.3.2009), in the best interest of public service subject to the terms and conditions noted below:

S.No.	Name and percentage	Address	Merit Order	Place of Posting	Remarks
1	Mohammad Ibrahim S/O	Bcori	1	GHS Madaklasht	A,V.P
	Rahim Khan				
2	Attaullah S/o Abdul Qadir	Gahiral	2	GHS Shoghor	A.V.Post
3	Fazle Rabbi S/o Wazir Khan	Parpish	4	GHS Moroi	A.V.Post
4	AbdusSaboor Khan S/o Sahib	Shishikoh	5	GHS Birganisar	A.V.Post
	Nor Khan		•••		
5	Sultan Ahmad Shah S/o S.	Ayun	6	GHS Domail	A.V.Post
	Ahmad Shah		•.		
6	Ashrafud Din S/o Aziz Murad	Werkup	7	GhSRech	A.V.Post
. 7 ·	Mirza Wali S/o Iltafud Din	Kesu	8	GHS Sonoghor	A.V.Post
8	Najeemud Din S/o Mir Abdul	Khot	9	GHS Brep	A.V.Post
9	Muhammad Tahir S/o	Mustajapandeh	69/Deceased	GHS Arkari	A.V.Post
	FazelQayum		emp: son	<u>_</u>	

TERMS AND CONDITIONS

- 1. Their appointment is purely temporary and they are liable to termination at any time.
- 2. They will be governed by such rules/regulations issued by the Government from time to time.
- 3. There service will be considered as regular but without pension/gratuity in terms of section 19 of the NWFP Civil Servants Act 1973 as amended by NWFP Civil Servants amendment Act 2005.
- 4. They will contribute towards CP Fund at the prescribed rate & contribution at the same rate will be made by the Government in lieu of pension.
- 5. The fresh candidates should produce Health & Age certificate from the MS DHQ Hospital Chitral.
- 6. Their appointment is subject to verification of Degrees/Certificates/Asnadsfrom the concerned Universities/Boards/Institutions, which is already in process. Any disinformation detected later-on will result to their termination from service.
- 7. They will be on probation for a period of two years.
- 8. Charge reports should be submitted to all concerned.
- 9. They should take over charge within 15 days after 1.3.2009 (This order will be effective w.c.f. 1.3.2009) otherwise their appointment will stand automatically cancelled.
- 10. Efforts for transfer before completion of normal tenure and irregularity in duty will result to their disqualification for further service. The appointees should produce an affidavit on stamp paper in this regard.
- 11. In case of any deficiency in posts being filled up the appointment of candidate with lesser merit will stand automatically cancelled.
- 12. If age of any fresh candidate exceeds 36 years (including 3 years for back ward area), he may not be handed over charge unless and until he produces sanction to the age relaxation from the competent authority.

(SAMAD GUL) Executive District Officer E&S Education Chitral.

Endst No. 1770-75/EB/Secy/A-3 dated Chitral the 24/02/2009 Copy of the above is forwarded for information to the

- District NazimChitral
 District Coordination Officer Chitral.
- District Coordination Officer Chitral.
 District Accounts Officer Chitral.
- 4. Principal/IM concerned
- 5. Middle sections (M&F) local office.
- 6. Candidates concerned +



Executive District Officer E&S Education Chitral.

ICE OF THE DISTRICT EDUCATION OFFICER MALET CHITRAC FRICE ORDER.

The Durawalko of the Occammum of Kinese Pathtanium Clanaday & Consider The second August Ministry DO (B2AO) 1-19/CASEDON2 (State) 11/07/2012 and Second of Englishing and second of the is se (FU) (FU/10-22) (E)/2010 mane 16/07/2012 and the approve 14 are theory 2013 Cases a Commissions in the ontoping factor on 16037/2316. This incoming [2.40] Cana 1875 12 and Factory preversing in the same à Lenne Char 1996-19 (21 für 198-8020-764-20909) bein Grad allanders an einer an ander des 1965 - 1956. sing when the product of the Previnces Constantial, in the loops the standard great becaused with allest how 10-0712114 stame have nowly up protect Secies Car. BPS-15 Pools

				• • •			
	STATE AND A CONTRACTOR	والمراجع والمتحر والمتحج والمتحج والمتحج والمحاجب والمتحاج والمتحج والمتح	And a second		;]		• • • • • •
	400 A SHIAL BA	131 8 40 51.00	lan edi. Is so which the second days	and the second stand with a second	- in the start	الإنكامية جزا المتأويل بجرا فتسويد الأخيان والتروي	المجرع المراجع والمحاج و
		1. A. S. N. S. S. A. S. S. S.	er grupp Schatting (b)	日応信	1 1 1		
Ξ,	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	L. Targele and All the	and the second and the second s	ويهم والمرار والمشارية فالمعلمة فالمحافظ والمرادية والمحافية والمحافية	نيا ويتحرب أربع معرفة والم	NEW YOUR PROPERTY LONGING	وما والاين ومداعون ما الدول الأول ويتساعد والارا وتشاريني
		छ जामा छन् <u>म</u> छन्			5.5		n Mar yan ara bara da ta'an ar ar ar ar ar ar Mana ar ar an ang ta'an ar
				ودر ما و وجعد الفقاء المرجعة المعلمة المرجعة المعامة المعامة المعامة المعامة المعامة المعامة المعامة المعامة ا	ware	and the second sec	and the second
ų.	同志 三流之勤遵守法權 Ø	promation 10					
				مر به موجود المراجع ال مراجع المراجع ال	the second s	M	
	and the second s	1000103801010	to Disk! I I Sidney				
4	530 44.34 500 - F. C. C. T	Sector Sector of the sector sector is a sector	and the second se	ەر ئەيلىغاد مۇمۇرىد بىرى ئىلىغان ۋىمىرى . بەر ئەيلىغاد مۇمۇرىد بىرى ئىلىغان . يېرى يەرىيە ، مۇرىغ		2	
	通过的 正规的 的复数	illubla la prom	SUR.	Charles with a province of the second s	10, 10, 10, 10, 10, 10, 10, 10, 10, 10,		
,				· · · · · · · · · · · · · · · · · · ·	1° U 9		•. •
	The American	d to the east of	R AL TEAT	an a	Service contract of the service of the	MENTIFICATION NOT IN THE CASE OF	
	And both in the and the strength on the same	N 140 61 51 605 81 91	6 Q36 (195-1		- · · / // 2 Q	2	
		and the second se	المتحاد والمحاجة والمعالية ومعالية والمعادية والمعالية والمحالية	، معنا مرتبه گسته و دور : بوطر ورتبه و و و و و و و و و و و و و و و و مرتبه گسته و دور : بوطر و و و و و و و و و و و و و	المجافعوه والمردة متحد جانامت	والمتهادي مراجع والمعالي والمعادية والمتعادية	energe a ser a ser a ser
						•	
		•		1		•	

The second second states and the second s	and a state of the second state						
ST SINH INSIA	and the second	1		لاها ويور محج كالروا أستحطك الطباعين	the second state of a second second second second	tenden andere en anterior en en en anterior de la secondada en la secondada en la secondada en la secondada en	
- Provide the second state of the second st							
《学》》:《新》:《》 新版			FREE WERE		5	Ner (Parise)	11.4
and the second			1 10 20 10 14				52C
	Start and the second starter was a second	5	· · · · · · · · · · · · · · · · · · ·		一一。日本理律的		
the second second second second second second		and the second second	2	1	Constant and the second	A	
こうしょう ちょうえん ざんごう いいち ほう 感染 読み	The same of the Line of the						
a shekara na shekara na Banaka ka ka ka			3/3+4 · + 24 - 47 · 1	ETECHLINE F		· · · · ·	
الله الم			Edd Annal 2		4 G 12 C .		
	Charles Sectores and in the second	· · · · · · · · · · · · · · ·					
		and the second		er a star of the second se	and the second	Charles and The State of the second second	
[〉 【計】「歸由計	findad Také			· · · · · · · · · · · · · · · · · · ·			2
1 253 32 6 12	119203 14729		おちんてい うちょうようろ				
	and a strange of the state of the strange		Furthe Later		· · · · · · · · · · · · · · · · · · ·		,
A section of the product of the section of the sect	Server and a server server						

ERISS & CONDITION

- 8. They will be an economical for a period of case year extendable for an even
- They will described by such that bent regulation as may no issued here than to they by government 10 Their Survices Carling terminiples of any line, in case of these performances in terms an application document probationary period. In case of mercandust, he will be preceded under the rules. Stand (construction to pro-14 Charge report allouid be submitted to all concerned
- 12 They inter-so-senionly on lower cast will remain seach.
- 13 the TAIDA is alknowed by (pinning lines duty.)
- 14. They will have an under taking to the to be received in their service basis to the effect, such tax overpayment is make to from in the light of this order will be received and it they are wrighly promotion
- Nor al bo remained

SASAR KOHANNADI I DISTRICT EDUCATION GREICER (MALE! CHIRAL

26-31 (EB (MATHINING LATOR) WAY REAL TO THE

22 7-2014

niky & Socene by Education Kindse Parklunktivis Pilenavar for information, issues is filleer Churcher information, pleases

school concorned . niong with service basics dillo).

Concel for strict compliance

DISTRICT EDUCATION OFFICER. Unutes Chitrate

ATTESTED HUE COPY

<u>BETTER COPY OF THE PÁGE NO. 7</u> OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S E CHITRAL ORDER

In pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department No. SO (B&AD) 1-18/E&SE/2012 dated 11/07/2012 and Finance Committee order No. /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and the approval of the Departmental Selection Committee in the meeting held on 16/07/2014. The following (Male) Qaris BPS-12 are hereby posted to the post of Senior Qari BPS-15 (@Rs 8500-700-29500) plus usual allowanced as prescribed under the

`S.#	Total No. of Qari Posts duly defined by DAO	67
1 ·	1/3 33 % Share of S Qari	. 20
2	Share of promotion 100%	20
3	Already promoted to the post of Senior Qari	10
4	Post available for promotion	07
5	Promoted to the post of S Qari BPS-15	.02

		· .			
S.#	Sen#	Name	Father Name	Designation	Remarks
1	47 [.]	Sultan Ahmad Shah	Said Ahmad Shah	S. Qari	
2	51	Muhammad Tariq	FazalQayum	S. Qari	х.

TERMS & CONDITIONS

- 8. They will be on probation for a period of one year extendable for another year.
- They will governed by such rule and regulation as may be issued from time to time by Government.
 Their services can be terminated at any time in case of their performance found unsatisfactory during probationary period in case of misconduct he will be proceeded under the rules famed from time to time.
- 11. Charge report should be submitted to all concerned.
- 12. Their inter so sonority on lower post will remain intact.
- 13. No TA/DA is allowed for going their duty.
- 14. They will give an undertaking to this to be recorded their service books to the effect that if any overpayment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

(NISAR MUHAMMAD) DISTRICT EDUCATION OFFICER (MALE) CHITRAL

Dated 22/07/2014

Endst No. 10026-31/EB(M)/U-1/upgrd/Qari

Copy forwarded to the:

- 6. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for information
- 7. District Accounts Officer Chitral for information please.
- 8. Head Master School concerned along with service books.
- 9. concerned office
- 10. Officer concerned for strict compliance

DISTRICT EDUCATION OFFICER (MALE) CHITRAL



OTT & DISTRICT EDUCATION OFFICER (MALE) CHITRAL

· . Lot. of Knyber Palintant, I was "innertany & Secondary Education Ormartin 17 o and 1 or 11 and 2 - 10/E&SE 2012 and 11 4/-3012 and Finance Department endorsona SO $E_{\rm e}=22$ E₀ 2010 dated 16.07 2011 and consequent upon the recommendation of Contraction Promotion Committee of Elementary & Secondary Education Department Chitral in its 1. A T C 2014 CP-gradation promotion of the following Quri's BPS-12 of Elementary a secol is to Education Department Chitrai is largery ordered to the posts of 5 Qari's BPS-15 @ Rs.8500-7 V 29 12 pais astal abovances as admissible to them under the rules on regular basis under the oncy of Provincial government on the terms & conditions given below, with immediate effect

existing concy of recently service	Prev 21 2	Promoted as	Posted Agusted	Remarks .
5.4 Nat 2: Previous Designation	Station	5. yarı 6-15	Retained	Post aiready occupied by him.
2 Typer Anton Quin 5-12 3 A. Jus-Salvor Xnan, Qart B-1	GHS Swee	s Q:.ri B-15 s.Qari	Retained	As above
A. Lis-Sa Dor Knath, Sair D.		5 Quin B- 15	Relamed	As above
7 4 States Jun Qari 8-12	GHS Istaru	5.Qari B-15	Retained	As above

and the second of the on for a period of our star extendable for another one yea They with be developed by Such rates and I conditions as may be assued from time to time by the TO SALOND. TONS

3 Their service can be terminated at any take, in case their performance is found unsatisfactory during procedulation period. In case nusconduct, they shall be proceeded under the rules framed from time to

charge report should be submitted to all concernent

Their liner seniority on lower post will remain nation

ø

No . A Dr. is allowed for joining their duty

Lacy and give an under taking to be recorded in their service books to the effect that if any over payment is made to them to light of this order will be recovered and if they are wrongly promoted, they will be

Benere handning over charge once again then documents may be checked, if they have not the relevant

a addition as per rules, they may not be humand over charge of the post.

(Moin-ud-Dat K ----District Educe a 2.2. r Same and



i

<u>BETTER COPY OF THE PAGE NO. 8</u> OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S E CHITRAL

In pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department No. SO (B&AD) 1-18/E&SE/2012 dated 11/07/2012 and Finance Committee order No. /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental Promotion Committee of Elementary & Secondary Education Department Chitral in its meeting held on 14/11/2014 Up-gradation of the following Qari's BPS-12 of Elementary & Secondary Education Department Chitral is hereby ordered to the posts of S.Qari's BPS-15 @ Rs. 8500-700-29300 plus usual allowances as admissiblethem under the rules on regular basis under the existing policy of Provincial Government on the terms and conditions given below with immediate effect in the best interest of public service.

	s and conditions given below,	with miniculate en	oot in me best inte	Test of public service	
S.#	Name/Previous	Prev. Posting	Promoted as	Posted/Adjusted	Remarks
	Designation	Station		· · · · ·	
1	ShamsurRehmanQari B-12	GHS Reshun	S. Qari B-15	Retained	Post already occupied by him
2	HyderAmanQari B-12	GHS Sweer	S. Qari B-15	Retained	As above
3	AbdusSaboor Khan Qari B- 12	GHS BirgaNisar	S. Qari	Retained	As above
4	Muhammad IbharimQari B-12	GHSS Drosh	S. Qari B-15	Retained	As above
5	Ashrafud Din Qari B-12	GHS Istara	S. Qari B-15	Retained	As above

TERMS & CONDITIONS

ORDER

- 1. They will be on probation for a period of one year extendable for another year.
- 2. They will governed by such rule and regulation as may be issued from time to time by Government.
- 3. Their services can be terminated at any time in case of their performance found unsatisfactory during probationary period in case of misconduct he will be proceeded under the rules famed from time to time.
- 4. Charge report should be submitted to all concerned.
- 5. Their inter so sonority on lower post will remain intact.

6. No TA/DA is allowed for going their duty.

- 7. They will give an undertaking to this to be recorded their service books to the effect that if any overpayment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
- 8. Before handing over charge once again their documents may be checked, if they have not the relevant qualification as per rules, they may not be handed over charge of the post.

(Moin-ud-Din Khattak) District Education Officer (Male) Chtiral



dated Chutral the 19 14 12014

222 TEB W. C-17 Courses Secondry

Copy forwarded to the-201. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for information.

- 2 Deputy Commissioner Chitral for information, please,
- 3. District Accounts Officer Chitral for information, please.
- 4. Head Masters concerned Schools for information.

.

5. Teachers concerned for information & compliance.

District Education Officer (Male) Chitral

I



BETTER COPY OF THE PAGE NO. 9

Endst No. 110201-16210/EB(M)/U-1/Upgrad. Sonority Dated Chitral the 18/11/2014

Copy forwarded to the:

1.

2.

3.

4. 5.

- Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for information
- Deputy Commissioner Chitral for information please.
- District Accounts Officer Chitral for information please.
- Head Master School concerned along with service books. Teachers concerned for information & compliance-

DISTRICT EDUCATION OFFICER (MALE) CHITRAL



s.#	Sen .# ~~~~	Name	Father's Name	Na	Acad; Qualif;	Division	Porf: Qualf:	Domicil e .	Date of birth	D/O Isventry- into Govt Service	D/O regular apptt: in the present post	Place of posting	Cell No.
4	2	3	4 .	5	6	7	8	10	9	11	12	13	14
7		Hayaı Ullah	Rahmat Wali		FX.		Q/H/Tajveed	Chitral-	28/12/1968-	19/11/1986	19/11/1986	GHS: Balach	14
ŝ		Saleh ullah	Gul Feros		SSC .		Q/H/Tajveed		01/01/1562-			GHSS: G/Chashma	1
춝	~~~	Shams ur Rahman	Abir		FA	2nd Divn	Q/H/Tajveed	-Chitral	15/01/1967	20/1-1/1986	20/11/1986	GHS-Baranis -	0340-985366
		Shahir Ahmod	Mohd Qasim		Middle		Q/Tajveed				22/11/1986	GHS Moroi	
5		Sher Jamil	Sher Mast Khan	15	FA		Q/HV Tajveed					GHS: Bumburate	0340-957692
		Abdul Qayum	Noor Wali		SSC	2nd Divn	Q/H/Tajveed						0346-98948;
2	7	Mohd Umar Shah	Hafiz Mohd Shah	12			Q/Ft/Tajveed						0348-575814
8		Mohd Younus	Mohd Yousuf	12	SSC		Q/Tajveed		the second s	24/06/1992			0342-905317
2	9	Abdul Hanan	Sher Afzal	1:2	SSC/FA		Q/Fl/Tajveed					GHS: Kuju	0341-433298
		Khosh Azam	Saeed ul Asam	15	FA		Q/H/Tajveed	the second s				GHS: Ursoon /	0320-904170
		Mohd Musa	Fazle Rahmat	15	FA		Q/H/Tajveed					GHSS Drosh	0345-989520
2	12	Mohd Saeed ullah	Fazl ur Rahman	15	BAFA	2nd Divn	Q/H Tajveed	the second s			16/01/1997	GHSS Morilash	0348-241082
3	13	Noor ul Amin	Mohammad Amin	15	BAFA		Q/H/Taiveed		the second s		16/01/1998.	GHS Bazar Drosh	0342-922953
${\boldsymbol \Omega}$	14	Sultan Ahmad Shah	Said Ahmad Shah		MA/SSC		Q/H/Tajved/M.Ed/B,Ed						0345-570049
31		Abdus Saboor Khañ	Sahib Noor			2nd Diva	Q/TH/Tajveed/B.Ed	the second second			01/03/2009		0344-253557
	16	Muhammad Ibrahim	Rahim Khan				Q/ H/Rajveed/M.Ed				01/03/2009		0345-904673
7.	17	Mohd Tahir	Fazal Oavum				Q/H/Tajveed	the second second		02/03/2009	02/03/2009	HIS Drosh	0300-577541
8	18	Araf ud Din	Munir Ahmad				Q/H/Torveed/B.Ed			02/03/2709	02/03/2009 M	DU hitral	0342-943678
9.	19	M: Tanveer Ul Hag	Sheikh Abdullah	_			Q/H/Tojveed			03/12/2010	03/12/2010	GH Sussu	0345-410197
OT	20	Mohammad Akbar	Mohammad Shafi		MA.		Q/FL/Fajveed/B.Ed			the second se	01/03/2012		0346-914908.
ĩΤ	21		and the second se		the second s	2nd Dam	Q/FI/Yajveed/B,Ed					t S: Romboor	0340-986062
				-		2nd Dim	Q/FI/Tajveed/B.Ed				01/03/2013	1715 Ashirale DU Drach	0345-945129.
3	23					2nd Dive	OFF Tojveed				11/03/2013	IIIS Ashirate	0342-5113600
			the second s		the second s			Chinal ⁺	09/03/1986 -		1/03/2013	DU Drosh	0340-2063654
		alim Ullah	And the second se		WA						1/03/2013 C		0345-9383554
			the second se		AlArabic				1/12/1980	12/05/2714	2/05/2014 (1344-9871032
			Huhammad Kifayat Ihah						23/01/1978				0340-5830738
					અ અ						2/06/2016		7342-9067989
			and the second							22/06/2016 2	2/06/2016		0301-8977134
	20 1				(Sc				1/03/1991 0	8/10/2016 0			346-8294474
					11			Chitral (the second s		THS Prayit	1340-0234474
_			Hunamand Casim		EA lArabi			Chtral]		the subscription of the second se		HSS Arandu.	
	<u>:</u> ://	Juammad Anwar U! Heich	· · · · · · · · · · · · · · · · · · ·		[]	2	B.Ed		Television and the second s	And in case of the local division of the loc		HS Sweer	
					14			Chtral					306-5504578
					EA		VA komia						
<u>-</u>	$IS \mu$	mtiaz UD Din	i i i g UD Din 👘 🗍	12 1	มT					and the second		HS Broze	320-9619956

Certified that this Seniority list is finite indusprise in non-subjudices and all the Qari teachers working in District Church are included in this final seniority list.

D /

"D"

District Education Officer Chitral Lower

• • •

Better Copy

s.#	Scn #	Name	Father's Name	BPS No.	Acad: Qualif	Division .	Prof: Qualif:	Domicile	Date of Birth	D/O 1 st Entry into Govt Service	D/o regular apptt: in the present post	Place of Posting	Cell No.
<u>}</u>	2	3	4	5	6	7	8	9	10	11	12	13	14
H	1	Hayat ullah	Rahmatwali	15	FA	2 ND Divn	Q/H/Tajvced	Chitral	28/12/1968	19/11/1986	19/11/1986	GHS Balach	
·2	2	Salehullah	Gulferoz	12	SSC	D.Nazim	O/H/ Taiveed	Chitral	01/01/1962	20/11/1986	20/11/1986	GHSS;G/Chashma	
3	3	Shams urrahman	Abir	15	FA	2 nd divn	Q/H/Tajveed	Chitral	15/01/1967	20/11/1986	20/11/1986	GHS Baranis	0340-9853667
4	4	Shahirahmad	Mohdqasim	12	MIDDLE		Q/Tajveed	Chitral	30/06/1960	22/11/1986	22/11/1986	GHS Moroi	0340-9576928
5	5	Sherjamil	Sher mast khan	15	FA	2 nd di∨n	Q/H/Tjveed	Chitral	21/01/1966	26/11/1988	26/11/1988	GRS Bundurate GPS Konfuzi Gal SH, Boys cht;	0346-9894875
6	6	Abdul qayum	Noor wali	12	SSC	2 nd divn	Q/H/Tajveed	Chitral	01/07/1963	07/12/1988	07/12/1988	Grts Konnuzi	0348-5758144
7	7	Mohdumar shah	Hafiz mohd shah	12			Q/H/Tajveed	Chitral	01/07/1963	07/12/1988	07/12/1988	Genese, Boys cht;	0342-9053176
8	8	Mohdyounus `	Mohdyousuf	12	SSC ,	2 nd divn	Q/Tajveed .	Chitral	01/04/1971	24/06/1992	24/06/1992	OSH+ Kuja	0341-4332932
9	9	Abdul hanan	Sherafzal	12	SSC/FA	2 nd divn	Q/H/Tajveed	Chitral	-01/05/1973	05/01/1995	05/01/1995	Ola Uction	0320-9041708
10	10	Khoshazam	Sacedulazam	15	FA	2 nd divn	Q/H/Tajveed	Chitral	13/04/1963	01/06/1995	01/06/1995	GMSs droth	0345-9895207
10	10	Mohdmusa	Fazlerahman	15	ГА	2 nd divn	Q/H/Tajveed	Chitral	01/02/1968 .	01/07/1997	01/07/1997	GHS droth GHS barilasht	0348-2410829
12	12	Mohdsaeedullah	Fazlurrahman	15	BA/FA	2 nd divn	Q/H/Tajvced	Chitral	01/01/1965	16/01/1998	16/01/1998	CHIS Bayar Drosh	0342-9229539
13	13	Noor ulamin	Mohammad amin	15	BA/FA	2 nd diyn	O/H/Tajveed	Chitral	02/04/1980	26/09/2006	26/09/2006	GilS :parabeg	0345-5700499
14	13	Sultan ahmad shah	Said ahmad shah	15	MA/SSC	2 nd divn	O/H/Tajveed/M.Ed/B,Ed	Chitral	03/04/1976	01/03/2009	01/03/2009	CA ^I IS-Ayun	0344-2535573
15	15	Abdussaboor khan	Sahib noor	15	MAVEA	2 nd divn	Q/H/Tajveed /B.Ed	Chitral	17/10/1977	01/03/2009	01/03/2009	GHS bitenisar	0345-9046736
16	16	Muhammad Ibrahim	Rahim khan	15	MA	2 nd divn	Q/H/Tajveed/M.Ed	Chitral.	17/04/1977	02/03/2009	02/03/2009	GHSS drosh	0300-5775413
17	17	Mohdtahir	Fazalgayum	15	FA	2 nd divn	Q/H/Tajveed	Chitral	01/01/1988	02/03/2009	02/03/2009	GDU Chitral	0342-9436780
18	18	Arafud din	Munirahmad	15	ВА	2 nd divn	Q/H/Tajveed/B,Ed	Chitral	10/02/1985	03/12/2010 .	03/12/2010	GHS Kessu	0345-4101972
19	19	M; Tanvecrulhag	Sheikh Abdullah	15	FA	2 nd divn s	Q/H/Tajveed	Chitral	28/02/1985	01/03/2012	01/03/2012	GHS; Hone	0346-9149082
20	20	Mohammad akbar	Mohammad shafi	15	MA		Q/H/Tajveed/B.Ed	Chitral	05/05/1974	01/03/2013	01/03/2013	GHS; Ramboor	0340-9860620
20	20	Abdurrazaq	Abdul satar	12	MA/SSC	2 nd divn	Q/H/Tajveed/B.Ed	Chitral	20/11/1982	01/03/2013	01/03/2013	GHS;Tar	0345-9451295
22	22	Azizurrahman	Gil Nawaz khan	12	MA/SSC	2 nd divn	Q/H/Tajveed/B.Ed	Chitral	01/01/1983	01/03/2013	01/03/2013	GHS Ashirate	0342-5113606 ·
23	23	Ziaud din	Ghulam khan	12	MA	2 nd divn	Q/H/Tajveed	Chitral	09/03/1986	01/03/2013	01/03/2013	CDU Drosh	0340-2063654
24	23	Abdul maula	Abdul shakoor	12	MA/SSC	2 nd divn	Q/H/Tajveed/B.Ed	Chitral	01/03/1986	01/03/2013	01/03/2013	GCMHS chitral	0345-9383554
25	25	Salimullah	Aziz ullah	12	MA ·		B.Ed/qirat	Chitral	01/12/1980	12/05/2014	12/05/2014	GHS domil	0344-9871032
26	26	Rahmatnazir	Rahmatkarim	12	MA/ARABI			Chitral	23/01/1978	14/03/2015	14/03/2015	GHS arkari	0340-5830738
			· ·		C								
27	27	lhtishamulhaq	'Muhammad kifayatihah	12	FA	· .	Qirat ·	Chitral	01/03/1981	22/06/2016	22/06/2016	GHS Madaklasht	0342-9067989
28	28	Waliumahman	Khalil urrahman	12	FA		Tajveed S/Alamia	Chitral	27/01/1981	22/06/2016	22/06/2016	GHS Chumurkone	0301-8977134
29	29	Fayazwali khan	Tajwali khan	12	MSC -		Qirat	Chitral	1/03/1991 -	08/10/2016	08/10/2016	GHS Sosoom	0346-8294474
30	30	Abidullah	Shakirullah	12	MA		Qirat	Chitral	01/03/1984	11/03/2017	11/03/2017	GHS Prayit	
31	31	Muhammad yasir	Muhammad qasim	12	MA/ARABI	,	Alamia	Chitral	15/05/1988	11/03/2017	11/03/2017	GHSS Arandu	
				10	С		D 124	Chinal	25/12/1985	11/03/2017	11/03/2017	GHS Sweer	3
32	32	Muhammad anwarulhag	Abdulhaq	12	MA .		B.Ed	Chitral	25/12/1985			UNS Sweer	
33	33	Anayaturrahman	Aziz utlah	12	МА		· · · · · · · · · · · · · · · · · · ·	Chitral	10/03/1987	11/03/2017	11/03/2017	GHS Beori	0306-5504578
34	34	Mehrababdulhag	Muhammad tahir	12	MA		S/Alamia ·	Chitral	13/02/1981	28/03/2017	28/03/2017	GHS Birir	0320-9619956
	35	Imtiazud din	Mirajul din	12	FAS		S/Alamiaqirat	- Chitral	03/02/1990	24/03/2017	24/03/2017	GHS Broze	0346-9894009
35						·	L, ,,,		<u> </u>]		

رت حما - خرام من المري الله من المري الله من مري الحريق حمو المري في فراه عمون، - ابيل رائ تصحيح كم أن المس فراء جلي وال لوير 1 44-40 15 5 2009 du die 2 30 2 1 مر 1770.75 سارع 4 فرز به 2009 ، فر محت _ عرب " الركس در بارا مر ل من عرف ار اس ارد من مرب و س سے مل فروں کا او ع ادر فانون ممانی هی فتروی میر بیر مل وزن بر سے میرند ارد ا مي مي مرد بورتن داخي مي - إصب DED ملي آنس س ، يون في علو ت العين اور سي من كم ويل حارج ل وطالع وه من ع - (مر طراح الر ميرن (من رمت ر) طامح و الرحي الرين رسي بر بزيو - ار مان مرمی درمن الوانعین ارز س فی واضی می سربر ایران تر از س کر کالی مسارق مست حور المسب دما تما مع امن محص جرم كر مسر دفايات ا المرادون المرادر والمراجب في از مرو في المراد ٢ علم عمادر فرا أ فرور كم ما حال ما حال -لو الاستان الدر اور المسلم المرابع (رجودس مينا فولف jp,61 24/5/23 attested to be true Copy

э. No. PBR- 131251									
NEDIATE AND SECON									
WIERME SAL									
PEShawar N.W.F.P. Pakistan Secondary School Certificate Examination Session 1994 (ANNUAL) (HUMANITIES GROUP) HIS IS TO CERTIFY THAT Muhammad Ibrab in									
SESSION 1994 (ANNUAL) (HUMANITIES GROUP)									
Son/Daughter of Rah im Khan									
and a student ofGovt: High_School, Jalbai Swabi									
has passed the Secondary School Certificate Examination									
of the Board of Intermediate and Secondary Education, Peshawar held in March 1994.									
as a Regular candidate. He/She obtained Marks out of 850									
and has been placed in Grade B Representing Very Good									
The Candidate passed in the following subjects. 1. English 3. Islamiyat 5. Gen: Science 7. Isl. Studies 2. Urdu 4. Pakistan Studies 6. Gen: Mathematics 8. Pash to.									
He/She has been awarded Grade B on the basis of internal assessment by the Institution concerned. Date of birth according to admission form is <u>Seventeenth April</u> one thousand nine hundred and <u>Seventy Seven(17-4-1977</u>)									
Asstt. Secretary 4th August, 1994. This certificate is issued without alteration or erasure.									



S. No. 324506		HUN BOILN	-1 3 -
	Peshawar N.W.F INTERMEDIATE E SESSION 1996 (SUP	ND SEA	
	oNEDIT	-CON	•
			10.
			· · ·
Q,			°S.
2	Peshawar N.W.F	F.P. Pakistan	S
A		EXAMINATION	3
S	Humanities		0
	32331014 1990 (302		
THIS IS TO	CERTIFY THAT	uhammad Ibrahim	•
Son/Daughter of _	R	aheem Khan	
and a resident of	# st	wabi District .	
	527-B/P-95 has pass		
	liate and Secondary Educati	on, Peshawar held in D	ecember 1996
	lidate. He/She obtained	480 Marks ou	of 1100
and has been plac		presenting Fai	•
the Examination w	as taken as a whole/in parts	S.	
	, ,		the second second
the col	-		Secretary
Asstt Secretary-	This certificate is issued without	e . II	-



Counterfigned	Etye Exa	and a Student / private candidate of	14- Unive	
	The Examination was taken as a substant	Baughter of	niversity of Pesh. (Pakistan)	
Serial Nº 093975	in parts	10 the Degree of		

ATTESTED to be true Copy

The hamellor

Roll Dumber _ 44 14 O

Result beclared on OCTOBER 11, 2003

Aniversity of Peshawar

15 13 mg

(Pakistan)

 MUHAMMAD IDRAMM
 Son/Daughter of
 RAMIM KMAN

 and a student of private candidate of
 District Swadi

 having passed the prescribed examination held in
 August, 2006

 is this day admitted by the University of Peshawar to the Degree of

 Master of Arts

In

In Second Division The Examination was taken as a whole /~in~parts~

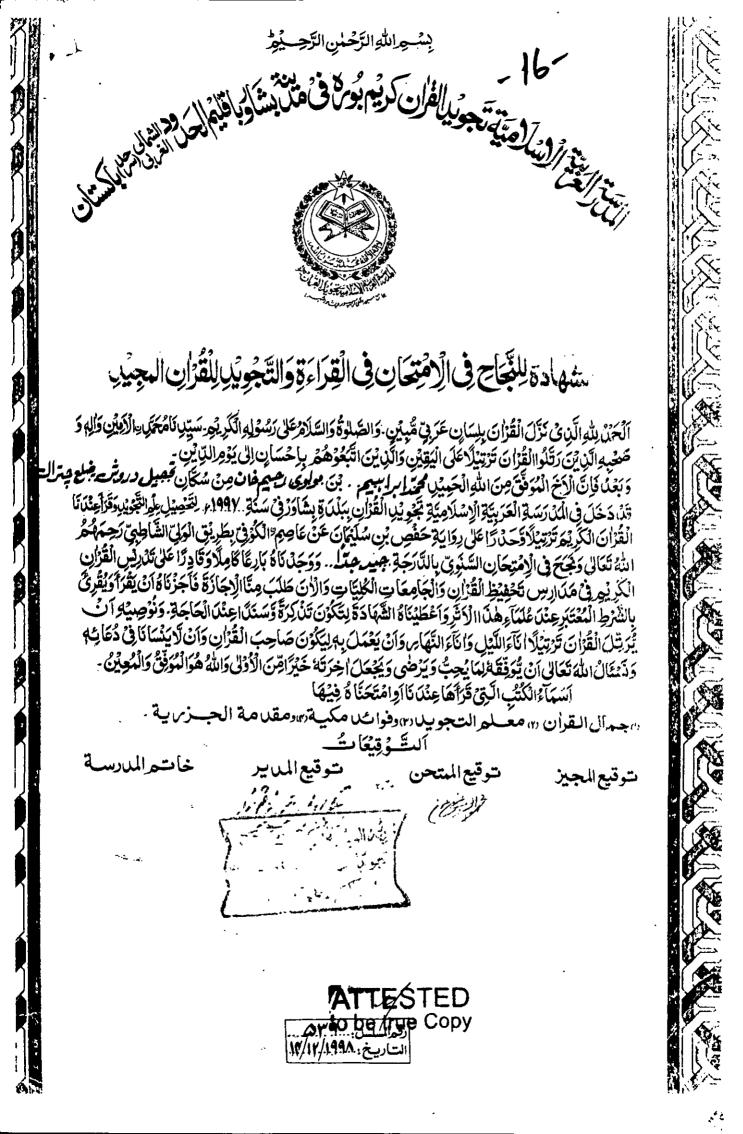
Serial Nº 0057827

Registration No. 2000-PC-5690 Roll No. 25065 Result Declared on 6114 BARONS 2007



Countersigneb

Dice. Chantellor



بسم الله الرحمٰن الرحيم كشف الدرجات إمتحان التجويد وقراءة القرآن الكريم ٱلْمُكَسَرَّلْكُم يَتَنَّ ٱلْإِسْلَامَ مِتَى يَحْفِ بُكُلْ لَقُسْتَنَ مَنْ رَحِطْ) كُريم يوره پشاور سرحد باكستان رقم المسلسل...١٢ ٢٠٠ (رقم الجلوس ... (. ۵۰ ه.) 1991 عام اسم الطالب . عد البراهم م الوالد رجم في لا. تاريخ الميلاد 19.1. إلمديوية مروري الم الم الدرجات مكتبة المادة 90 1 . . الترتيل 90 التدوير 1 . . 90 جسال القرآن سعلم التجريد 1 . . لتجويد نرائد المكية، المقدمة الهزريا Y20 مجموع الدرجات 7... تشهد مدرسه تجويد القرآن بان الطالب المذكورة قدنجع في الامتحان النهائي بتقديد جيرجر الم · وآخر دعوانا إن الحمد لله رب العالمين وصلى الله تعالى على سيدنا محمد وآله واصحابه واهل بيته اجمعين. تاريخ الاجراء فلتخالمدرسة توقيع المدير 14-12-98

ATTESTED to be true Copy .

Allauma Iqbal Open Anii 18-Islamabad



Seriat No. 287659.

Certified that Mr. / Ms. MUHAMMAD IBRAHIM Son / Daughter of RAHIM KHAN Registration No: 12NCL01048 Roll No: AQ653917 having successfully completed the prescribed requirements in semester SPRING 2013 is awarded the degree of

Bachelor of Education (B.Ed)

He/She has secured

68 % marks and has been placed in B grade.

VICE-CHANCELLOR

CONTROLLER OF EXAMINATION

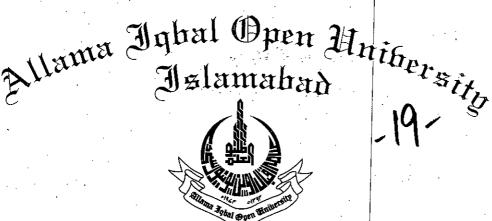
Result declared on:

Date of issue: June 12, 2018

December 26, 2013

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

ATTE to be true Copy



Serial No. A004566

Certified that Mr. / Ms. MUHAMMAD IBRAHIM

Son / Daughter of RAHIM KHAN

Registration No: 12NCL01048

Roll No: BJ669920

having completed the prescribed requirements in semester

SPRING 2017

is awarded the degree of:

MASTER OF EDUCATION (M.ED)

He/She has secured

65 % marks and has been placed in B grade.

Wug

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

ATTESTED to be true Copy

	19"-70-
	OFFICE OF THE DISTRICT EDUCATION OFFICER
K I DE STATE	(MALE) LOWER CHITRAL
	Phone: 0943-412627
No. 111.0	Email address: deamchilral@amail.com
NO. 1199 To,	57EB(M) P-2/Prom: B-16& above/Vol-III Dated 5/7/2023
1.	
2	Principal GHSS Ayun and GHS Broze ,Bumborate,Drosh,GCMHS Chitral
۷	
	kuju GHS Hearth, GHS Arkari GMS Khorkashandeh, GMS Mough, GMS Besti Arkari
Subject: -	
	STT/TT SDM/DM S/DAPI/CAPI/CAPI/CAPI/CAPI/CAPI/CAPI/CAPI/C
Memo: -	SST(G) /SST(BIO+CHEM/ SST(M/P) &SST(IT)BPS-16

Memo: -

p

With reference to the letter of Director E&SE Khyber Pakhtunkhwa Peshawar vide No. 2119-200/F.No.01/ promotion to SSTs/2023/Estab-1(M) Dated Peshawar the 22/8/2023, regarding the subject noted above.

You are hereby directed to inform the following teachers to submit their file comprising the documents mentioned below within 05 days positively for scrutiny and preparation of working papers for onward submission in the meeting of Departmental Promotion Committee on 21/09/2023 at Directorate of E&SED Khyber Pakhtunkhwa Peshawar

School	
201001	For Promotion t
N N	SST(G),SST(B/C) and SS
T TO SST(G)	(M/P)
GHS Broze	1
	SST (G) BPS-16
* Chumorkone	SST (G) BPS-16
	- SST (G) 8PS-16
GHS Moroi	SST (G) BPS-16
GHSS Ayun	SST(G) 8P5-16
/PST TO SST(G)	
GPS Beori Bala	SST(G) BPS-16
GPS Thunik	SST(G) BPS-16
TO SST(B/C)	
GHSS Bumbora	te SST (B/C) BPS-16
GHS Drosh Baza	ar SST (B/C) BPS-16
GHS Parabeg	SST (6/C) BPS-16
GMS Shishi	Waiting
ST TO SST(B+C)	
GPS Tek Kaldam	Waiting
_	GPS D/U Drosh GPS Tek Kaldam

· • • • • • • •

1

ATTESTED to be true Copy

		- 21-
4 - {•} - \$ %	SCT/CT TO SST(P/tdath)	
• •	1.11 Initiation and CT BPS 15 GHS Hearth PSHT/SPST/PST TO SETUDIO 444	1557 (0/14) 605 16
• •	PSHT/SPST/PST TO SST(P/Math)	
10:	Shalin Ur Karmari SPST 6:4 Grstny ute	
•		557 [!**/P} EFS-16
1 (7)	Muhammad Ghaloar Stitt BES-16 GCMHS Chara	ana an
		(\$\$1 (G) PPS-16
1 10	toutiaminad Lafarullah STT BPS 16 GHSS Ayun	
MA	Senior Qari/Qari TO SST(G)	1 557(G) BPS-16
-(61)(01) -	Mr. Sultan Atimad Shah BPS 15 GHSS Ayun	
\mathbf{O}		55:(6) (05-16
The above o	ted teachers should submit their file having the following net	i
		essary pocoments,
1	Child photo conv	
2	Bio-Data	
ł	Synopsis	
4	ACR/PERs last frie years	
5	last five years result	
6.	All Academic & Professional documents	
15	Domisile	
16	Last pay Skp	
17.	1" appointment order	
15	Promotion order(If any)	_
19.	Non-Involvement certificate	
20	Service Certificate	
21.	Photo copy of Service Book 💷 👘 🗁	
22	Original Service Bool's (Update and complete in all sorts o	1
	professional qualifications with documentary proof of NOI	Cs/Ex-Post FACTO Sanctio
	and Service verification).	
Note:- All do	ocuments 2 set must be attested by Reporting Officer.	
	· · · · · · · · · · · · · · · · · · ·	I
		North Francisco Office
• •		District Education Office
••		7 (Male) Lower Chitra
Endst: No.		Dated/202
	arded to the: -	
1. Dirc	ctor E&SE Khyber Pakhtunkhwa, Peshawar	
	ce file.	
/		

۰,

1

۰.

ATTESTED to be true Copy ³District Education Officer (Male) Lower Chitral

BETTER COPY OF THE PAGE NO. 21

			1	·						
		SCT/CT TO SST	(P/MATH)	· · ·						
01	89	Mr. Imran Khan CT BPS-15	GHS Hearth	SST (P/M) BPS-16						
;		PSHT/SPST/PST TO	SST (P/Math)							
02	101	Shafiq Ur Rehman SPST B-14	GPS	SST (M/P) BPS-16						
	, SDM TO SST (G)									
1	09	Muhammad Ghafoor SDM BPS-16	GCMHS Chitral	SST (B) BPS-16						
		STT TO SS	T (G)	, s.						
1	10	Muhammad Zafarullah SST BPS-16	GHSS Ayun	SST (G) BPS-16						
		. Senior Qari/Qari	TO SST(G)							
01	04	Mr. Sultan Ahmad Shah BPS-15	GHSS Ayun	SST (G) BPS-16						
	•									

The above cited teachers should their the having the following necessary documents.

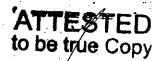
- 1. CNIC photo copy
- 2. Bio-Datá
- 3. Synopsis
- 4. ACR/PER's last five years.
- 5. last five years result.
- 6. All Academic & Professional documents.
- 15. Domicile
- 16. Last pay slip
- 17. 1st appointment order
- Promotion order (if any)
 Non Involvement Certificate
- 20. Service Certificate
- Service Certificate
 Photo copy of service book
- 22. original Service Books (Update and complete in all sorts of entries five academic and
- professional qualifications with documentary proof of NOCs/Ex-post FACTO Sanction and Service Verification)
- Note: All documents 2 set must be attested by Reporting Officer.

District Education Officer (Male) Lower Chitral

Endst No. ____/EB(M)P-2/Prom:B-16&above/Vol-III Copy Forwarded to the; Dated ____/2023

Director E&SE Khyber Pakhtunkhwa, Peshawar.
 Office file.

District Education Officer (Male) Lower Chitral



"H, خرمت فنان داند مرد حات المرد المرد المرد الم معرف، ابعل مانت سنارال اس فرا صل عرال الم 16-10113 184060 1,1, E (10, 0) مرم 49 (ور) 900 د تو مست ٤ ر) الموسق وما دان من المرك مرد . ميرف أو درس أكثر منه من كارم فرد الم فرد الله الم عمر عما -سال 1/36 ء میں 2013 - 3- 11 تاریخ برا 13 فراء کا آرڈر تمرہ 7-2186 در طور سر ماری میں کا در مرموث روا رائع سال 14201-18 كو أردا بل 16201-16210 م توسي ماغ واد م الطور منرى رى " مكسل مركاسي مروموس موا-امن سال مص ١٩٥٦ مو دسترسه فون (ما كن (ما ٢ ٢ ٢ ٢ ٢ ٢ ٢ ٢ ان والرميس في مري - ليرس لوسي وسي ما يوني كم من و اره كما -معرمین سال کراه و کا سینا دان میں میں میں ساتھ بھری میں ایک آردار میں جو سے الم في توجيع در شايا كمرا شون ندار من ومردن من خارج لا ب من الم من الم فروى مراس ومن موج دلال لو ي لو من كر يوب في كر من من الم ت سع والسب مع الى سار م دس رما ما ما ما من رسا عا- وه اسل الله عروزان المال المال المالي منه المراك من منه من علما عا- (من على عنال 2020 - 1202 10, 2020 in mon 202 1, 2020 - 2020 - 2020 - 2019 000 4 c/ c 031 000 101 2 65 Riden 20 557 21 070, منی الاسے - کو ایس درران مال 2602 آج میں جن سنار کا الما جات ک اس من جر امنو هر من سر (لفان من الحظي / شان من مرد ا من من قرار الم 20 20 1 10 26-31 100 26-31 101 1 2014 UN W. Ely Con تر روس دسیات بوسیس سات رکا کر دو کر مروف س س بے ۔ (بال ال سام ال مراجع) ترج سرا رضر والون المع را وس تحق تلفى ازاع سلم ورفوانس أرار مر ترسیس از حق رط کافی ادر مجاری مسارق اے شیر میں فردن

ATTESTE to be true Coor.

در فراست گزارم از مانج دی 357 میں 30 فران کا حق ساج میں ؟ فرون مراب کا حق از تحسیا کام اور سیاری سنا کا تصحیح ارائی · 6 - 1 6 - 10 6 11 0 - 0 6 6 6 6 6 1 Jupi نوٹ یہ 100 - 10 کو آردنز 21 - 20 100 میں 7 دسان دست میں کار دو کو کہوں برمون کی کی سے ی اور میں سی دیر ی مار میں از از مار میں از اور کے برسکا . دمن مسارق مد ایر آردر ورخ اس می ساد کی بی -69/61 فمرارا سم ولارهم مان مسركان و المر مع مع معلم الله الله المرك اللح معلي فترال لوكمر" 5 2023 no 9 - Rid ATTESTED to be true Copy

SCANNED KPST Peshawar

VAKALATNAMA BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

	Appeal	No	_/2023
M. Ibrah	um		(APPELLANT) (PLAINTIFF)
· · ·	VE	<u>RSUS</u>	(PETITIONER)
	ion Dept		(RESPONDENT) (DEFENDANT)
I/We_A	plant		

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

Dated.____/202

<u>CLIENT</u>

ACCEPTED

NOOR MOHAMMAD KHATTAK ADVOCATE SUPREME COURT

WALEED ADNAN

UMAR FAROOO MOHMAND

MUHAMMAD AYUB

MAHMOOD JAN ADVOCATES

OFFICE: Flat No. (TF) 291-292 3rd Floor, Deans Trade Centre, Peshawar Cantt. (0311-9314232) &

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SA NO. 1875/2023

Mr. Muhammad Ibrahim Senior Qari BPS-15 GHSS Drosh District Lower Chitral

Versus

- 1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
 - 2. District Education Office Chitral Lower
 - 3. Sultan Ahmad Shah Senior Qari GHSS Ayun District Lower Chitral
 - 4. Abdul Saboor Khan Senior Qari GHS Birganissar District Lower Chitral

......RESPONDENTS

.. APPELLANT

4 E

Index

S.N.	Description of Documents	Annexure	pages
1	Joint para wise Comments		1-2
2 ~	Seniority List		3-4
	Seniority Lists issued time to time appointment or der		5
3	Promotion orders		6-8
4	Affidavit		9

District Education Officer (M)

Lower Chitral

BEFORE THE KHYYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Versus

SA No. 1875/2023

Mr. Muhammad Ibrahim Senior Qari BPS-15 GHSS Drosh District Lower Chitral,

- 1. Director Elementary and Secondary Education of Khyber Pakhtunkhwa Service Pribuoal Diary No. 9364 Peshawar. Duted 23-11-23
- 2. District Education Officer Chiral lower.
- 3. Sultan Ahmad Shah Senior Qari GHSS Ayun District Lower Chitral
- 4. Abdul Saboor Khan Senior Qari GHS Birganissar District Lower Chitral.

......RESPONDENTS

..... APPELLANT

JOINT PARA WISE COMMENTS/REPLY ON BEHALF OF THE RESPONDENTS

NO.1, 2, 3537

Respectfully sheweeth:-

Preliminary Objection:

The respondents submit as under:

- 1. Correct to the extent that the appellant was appointed as Qagri BPS- 07 on 24-02-2009 and the claim being at senior No. 1 in appointment order is also correct but seniority is not reckoned as per serial number of appointment order which was prepared as per prevalent rule (date of taking over charge) appointment order annexed as annexure ("A)
- 2. Correct to the extent that the respondent Department promoted Qari from B-12 to S.Qari B-15 vide office order Endst: No. 10026-31 dated 22-07-2014, but the appellant neither submitted any appeal against the promotion in parent Department nor filed petition in Judicial forum during the last 14 years and relied on erstwhile Seniority List annexed as annexure ("B").
- 3. Correct, to the extent that the appellant including respondent No.4 promoted by respondent Department from Qari B- 12 to S. Qari B-15 dated 18-11-2014, but the appellant did not appeal against this promotion as well, promotion order annexed as annexure ("C"),
- 4. Correct to the extent that the private respondents were placed senior than the appellant as per erstwhile seniority List and the appellant had never appealed against the said seniority list.
- 5. Incorrect, that the appellant had never submitted any appeal against the seniority lists within stipulated period.
- 6. Correct he was neither eligible to be promoted as per rule and law and had nor submitted any appeal against the promotion.
- 7. Incorrect, that respondent Department has not recommended the private respondent NO.04 for the said DPC.
- 8. Incorrect, that the tentative seniority List is prepared in December of every year by the authorized Committee and then stipulated period is given to submit appeal against tentative seniority List before appellate Committee and after lapse of stipulated period

SCA

no appeal is accepted and final seniority list is issued and the appellant has never appealed against the seniority list.

9. That the appellant has got no cause of action, Locus Standi to file this instant appeal. **Grounds:-**

a. Incorrect, that the said Seniority List is as per rule and law.

 Incorrect, that the appellant has been treated as per law and rules and respondent Department did not violate Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- c. Incorrect.
- d. Incorrect, that the Seniority List is as per rule and law in vogue.
- e. Incorrect to the extent that respondent No. 03 i.e. Mr. Sultan Ahmad Shah S.Qari B-15 is eligible for promotion for the post of SST (G) B-16 being senior than the appellant, Seniority list is annexed as **annexure** (**"B"**).
- f. Incorrect.
- g. That Para No. G is incorrect, hence no comment.
- h. Incorrect that the respondent Department has recommended most senior as per seniority List and appellant neither submitted any appeal against seniority Lists during last 14 years and relied on Seniority Lists issued from time to time.
- i. It is upon the Honorable Court.

Prayer

Therefore, it is respectfully prayed that this appeal may be dismissed. Respondents 1 & 2

Through AG.

Respondent No. 1

Respondent No.2

AC bal Khan

Director (E&SED) Khyber Pakhtunkhwa Peshawar

Mahmood Ghaznavi District Education Officer (M)

			the second se					Donnicil	Dose of	D/O Istentif	D/O regular appre: In the	Place of posting	Cell No.
ي ا	1				Acad:	Division :	Parf: Qualf:	e	birth	Service	present post		14 -
۴Ľ		Naine		_	Qualif:	·		10	. 9	<u> </u>	12	CHS Balach	
1				. د	: 6	7 .	· Sur	Chiral	28/12/1968	19/111986	20/11/1986	GHSS: G/Chashma	
1	3 :	· · · · · · · ·	Rolunci Woh	15	FA	2nd Drin	OF.WTorveed	Chinal	01/01/1962-	20/11/1986	20/11/1980		0340-9853667
iFF	7		Gil Fera:		235		O!H/Tojveed	-Chival-	15/01/1967	20/1-1/1986	22/11/1986	GHS Morol	03-10-9576928
21	2	20(C) toron		15 -	FA		O/FV/iajveed	Chitral	10/06/1960	22/11/1986:	22/11/1900	GHS: Bumburate	0346-9894875
ΞT	3	Shama w Rahman			Middle	1	O/Tarverd	Chitrol	21/01/1966	26/1-1/1988	26/11/1988	GHS Koghuzi	0348-3758144
1	1	Shean minter	17.1000 0.0000	15 .	E.		OTH Tarverd	-Chilrol.	01/0771963	07/12/1988.	07/12/1988	GCMHS: (Bovs) Chi	0342-9053176
া	5	310	10/21 Pitch	12	SSC	2nd Dim	O/R/Tojveed	Chitral	01/07/1963	07/12/1988	07/12/1958	- GHS: Kuju	0341-4332982
- 1	6-	Abdul O anim	Noor Bab	12 :			O/A/Taiveed		101/01/1971	24/06/1992	24/06/1992	GII:3:"Ursoon	0321-9041703
1	2	Charles and the second s	Jiefiz Lighd Shah	172	550 -	2nd Dim	C/Topeed	Chitral	TI/D://973	105/01/1995.	05/01/1995	GILS: Ursoon	03-15-9595207
_	· P -	Mond Toronus	Hohd Younif	12	NSC/F.4	Der Dien	OF/Juived	Chilice	13-04/1963	01/06/1995	01/66:1995	GHSS Drosh	. 0348-2410829
<u></u>	<u></u>	Abdul Hanan	Star vifari			Und Dor	OF/Farred	Chival	11/01/1961		01/07/1997:	GHSS Morilashi	0342-9229535
<u>9 j</u>	<u>.</u>	13D1 - Labor	Sceed ad Asona	15.	FA	2nd Divi	OTH Tojved	Chilra!	01/02/1968		116/01/1998.	GHS Bazer Drosh	0345-5700499
\hat{q}	10	Diash Linn	Forle Rating	15	F.A	2nd Divi		Chiral	01/01/1985		26/09/2006	GHS: Parobeg	0343-370049
1	<u> </u>	Mohd Kuzo	Fact ur Rahman	115	DUF.	IZNA DIVI	OTH Tojverd	Chiral	02/01/1961		01/03/2009	GHS: 1yun	10344-20007
2	12	Molid Saced ullah	is the second denies	15.	BATA	Ind Un	OIH/Toped/M.Ed/B.Ed	Chitrai	03/01/191	01/03/2005	01/03/2009	GSS: Birgo Nisor	0345-904673
I	43	Noor u. A sin	and Shok	15	- MASSE	2nd Dhn		Chiral	17/10/197	01/03/2009	02/03/2009	GHSS Drosh 🕐	- 0300-577541
24	14	Sultan Almod Shak	Schit Noor	175	ALUEA	2nd Dhm	OHI Spread La	Chival	17/04/191	02/03/2009		GDU Chitral	0342-943678
rπ	11	Ahdus Saboor Khan	2012 1000	175		Isl Dhm	OI Marveed M.Ed	Chirol	1	(12/03/2909	02/03/2609	GHS Kessu	0345-410197
76	16	Munannad Ibrahim -	Rolin Khan	-175	11	2nd Div	n ONTanced	Chiral		109/12/2010	03/12/2010		0346-914908
77	tii	Mohd Talai	Femi Onuan	15		2nd Div	OR Topveed B.Ed	Chitral		01/03/2012	01/03/2012	GHS: Romboor	03-10-936062
10	hi	Araf ud Din	Munir Almoid	15		2nd Diw	- OIH/Taiwed			1 01/03/2013	01:03/2013		0345-945125
10	1	M. Tamiter Ulillog	Sheills Abdullais	-15			O/H/Topsed/B.La	Chira			01/03/2015	GHS: Tar	0342-511360
	+	Mehaisunad Aktor	Mohemmad Shall	- section -		2nd Din	n O/HA opred/B.Ed	Chira			71:03/2013	GHS Ashirate	0340-20636
20	44	Little Resort	Lited Saur	12				- Chiro	and the second se		01/03/2013	CDU Drosh	0345-93835
21	44	I Abdur Rosca	(Gel Nava: Khan	112		2nd Div	n OHTaneed	Chizi	1 09/03/198		01/03/2013	GEMHS Chirol	U3-14-98710.
22	17	1 Astur Rahmas	Ghulan Licen	72	7.4			Chiut	1 01/03/178			GHS Domil	0344-98710.
23	12	3 Ziona Din	pitcid System	1/2		1.11.2.01	D.EZOirat	Chibo	1 01/12/198		11/03/201	GHS Arkari	03-10-58307
24	12	4 Abdul Masie	ini: Uilah	12	34		<u>a.c</u>	Chuai	23/01/191	13 1:/03/2915		6 GHS Aladaklasht	0342-90679
25	12	5 Salim Ullah	Relinet Earlin	172	12.511450	bic		Chive		1 22/06/21/6	and a second sec	and the second second second	0301-89771
2	T	6 Rahmat Marir	Vi chammad Kifevar th:				Q'rol	Chir:		22:06/2-116			0346-82944
27	17	1 Huishan Ul Hac	111 in Station Allengin and	172		-T	Tired S/Alamia	Chiu:		03/10/2010	: 08/10/201		
		të lifeli Ur Rohman	i = R U Rohman	- 17			Orol	Chiu:			- 11/03/267		
	+	19 Favaz Wali Kan	Tey Web Ling	$-\frac{n}{2}$			0001.				r 1/1/03/2 <u>0/</u>		
-	+	10 .Ibel Ullak	t, certar letter			uhi .	zianio	Crite			1,03/201		0306-3504
1	<u>+</u> +	31 Michemand Fastr	193511111 6 35.00	<u> </u>		<u></u>	. 3.Ed	Chim			Fi 1/03/201	7 GHS Beori	10320-9619
Ē	<u>_</u>	12 Maammad Americ LL	5 1 1 C 1 1 1 1		2 11:			Chin			7 1/1/05/201	7 GHS Birir	10320-0073
3	2	Ji Maammaa Auver, C.	<u></u>		<u> </u>	!~	y kanin	Chin	1 13:01/19			17 _ GHS Braze	0346-9894
3	3	33 Annyot Ur Resinen		17			Sylbaria Grat	Chiv	1 03/02/15	94 . 241.21.201	·		
5	7	14 Mehrnholty VI linst 13 Junier UD Des		ī,	12 17.4		chars working in District C				-		

.

District Education Officer Chitral Lower

Certified that this Semarity Id.

			· · · · ·											
			1			•					· ·			
							· ·.	Better Copy		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1				
	۰	· .•			•••						· · · · · · · · · · · · · · · · · · ·	<u> </u>	Place of Posting	1 Cell No.
									Domicile	Date of Birth	D/O 1" Entry into Govt	D/o regular applit in the		
				t desta Nomo	BPS	Acad: Qualif	Division -	Prof: Qualif:			Service	present post	<u> </u>	14
شي آ	1 Sc	ר ה	ame ,	Father's Name .	No.	•••••••••	·. ·		1 1		11	12	GHS Balach	1
17					· · ·]		·	18	9	10 28/12/1968	19/11/1986	19/11/1986	GHSS;G/Chashma	
	· ·				·5 ·	6	7	Q/H/Tajveed	Chitral		, 20/11/1986	20/11/1986	GIIS Baranis	0340-9853667
	2	1	3	Rahmarwoli	15	FA	2 ND Divn	Q/H/ Tajveed	Chitral	01/01/1962	20/11/1986	20/11/1986	GHS Moroi	0340-9576928
· HT	-1		Hayat ullah		12	SSC	D.Nazim	Q/H/Tojveel	Chitral ```	15/01/1967	22/11/1986	22/11/1986	GIIS;Bumburate	0346-9894875
12	- 2		Salchullah	Gulleroz	15	FA	2 nd divn	G/Taiveed	Chitral	30/06/1960	26/11/1988	26/11/1988	GIIS;Bumburate	0348-5758144
15	- 3	. 1	Shams urrahman	Abir	12	MIDDLE	l		Chitral	21/01/1966	07/12/1986	07/12/1988	GHS Koghuzi	03-2-9055176
14		_	Shabirahmad	Molidgasim	15	FA	2 rd divn	Onutification	Chitral	.01/07/1963	07/12/1988	07/12/1988	GCidSII: Boys cbC	0341-4332,32
. 5		-+-	Sherjamil	Sher mast khan	12	SSC	.2 nd divn		Chitral ·	01/07/1963	24/06/1992	24/06/1092	GSH; Kuju	0320-9041708
			Abdul goyum	Noor weli	112			C/H/Tajveed	Chival	01/03/1971	24/06/1992	05/01/1995	GHS; Ursoon	0345-9895207
6			Molidumar shel:	+ italiz mond shah		SSC .	2 ^{cu} divn	Of raived .	Chitral	-01/05/1973	05/01/1995	01/06/1995	GHSS drosh	0348-2410829
11	- 7		Mondyounus	Mohdvousui	12	SSC/FA	2 ^{nJ} divn	0/10/10/000	Chitral	13/04/1963	01/06/1995	1-01/07/1997	GHSS Morilasht	0348-24108-25
. 8			Abdul hanan	Shcrafzal	12	FA	2 rd divn	Q/H/Tajveau	Chitral · vi	01/02/1968 .	01/07/1997	16/01/1998	GHS Bazir Drosh	0345-5700499
· [9			Khoshazam	Sacedulazarn	15		2 divn	Q/H/Injveed	Chitral	01/01/1965	15/01/1998	26/09/2006	GHS parabeg	0345-5700494
		0		1 Fazlerahman	15	FA	2 rd divn	Q/II/Tajveed		02/04/1980	26/09/2006	01/03/2009	GHS:Ayun *	0344-2535573
D		<u>II </u>	Mohdinusa	Fazhurrahman	15	BAJEA	2 nd divn	O/I/Tajveed	Chitral	03/04/1976	01/03/2009		GHS:birganisar	0345-9046736
_ <u>.</u> -[1		12	Mahdsacedullah	Mohammad amin	15	BA/FA	2ª divit	Q/11/Tajveal/M.Ed/B.Ed	Chitral	17/10/1977	01/03/2009	01/03/2009	GHISS drash	0300-5775413
_:T	3	13	Noor ulamin	Said ahmod shah	15 .	MA/SSC	2° ^d divn	O/II/Tajveed /B.Ed	<u>Chitral</u>	17/04/1977	02/03/2009	02/03/2009	GDU Chitrat	0342-9436780
	14	14	Sultan ahmad shah	Sahib noor	15	MAVEA		Q/II/Injvccl/M.Ed	Chitral. :	01/01/1988	02/03/2009 ··	02/03/2009	GHS Kessu	0345-4101972
. · F	15 1	15	Abdussaboor khan	Rahim khan	15	MA ·	2 ^d ivn	Q/H/Taiveed	Chitm	10/02/1985	03/12/2010	03/12/2010	GHS; Hone	0346-9149082
		16	Muhammad Ibrahim		15	FA	2 divn	Q/H/Tajveal/B.Ed	Chitral	28/02/1985	01/03/2012	01/03/2012	GHS; Ramboor	0340-9860620
• Lee		17	Mohdiahir	Fazalqayum	15	BA	<u>2* divn</u>	Q/H/Tajveed	Chitral	28/02/1985	01/03/2013	01/03/2013.	GHS; Tar	0345-9451295
· •		18	Arafud din	Sheikh Abdullah	15.	FA	2 ^{re} divn s	Q/II/Tajveed/B.Ed	Chutrul	05/05/1974	01/03/2013	- 01/03/2013		0342-5113606
· –		19	M; Tenveerulhag	Sheikh Abduntan	15	MA		O/H/Tajveed/B.Ed	Chitral	20/11/1982	01/03/2013	01/03/2013	GHS Ashimte	0340-2063654
		20	Mohammad akbar	Mohammad shafi	12	MA/SSC	2""divn	Q/II/Fajveed/B.Ed	Chitral .	. 01/01/1983	01/03/2013	01/03/2013	CDU Drosh	0345-9383554
		21	Abdumazaq	Abdul satur	112	MA/SSC	2"divn	O/H/Tajveed	Chitral 1	09/03/1986	01/03/2013	01/03/2013 .	GCMHS chitral	0341-9871032
		22	Azizumaluman	Gil Nawaz khan	12	MA	2 ^{co} divn	O/Malveed	Chitral	01/03/1986	12/05/2014	12/05/2014	GHS domil	0340-5830738
	23	23	Ziped din	Ghulam khan	12	MAVSSC	2"dieu	Q/H/Tojveel/B.Ed	· Chitral	01/12/1980	14/03/2015	14/03/2015	GHS arkan	0540-5626-66
Ľ,	24	24	Abdúl maula.	Abdul shakoor		MA		B.Ed/qirat !	Chural	23/01/1978				0342-9067989
· F		25	Salimultah	Aziz ullah	12	MA/ARAB	· · ·			· · · · · · · · · · ·	.22/06/2016	22/06/2016	GHS Madaklasht	0,12,000,000
.	25	25	Rahmatnaziri	Rahmatkarim	1 14	C			Chitral	01/03/1981	.27/10/2010			0301-8977134
·.	26	20	Rammannan	· · ·				Qimi				27/06/2016	GHS Chumurkone	0346-8294474
I			Ibtishamulhaq.	Muhammad	- 12	rn.		·	Chural	27/01/1981	22/06/2016	08/10/2016	GHS Sosoom	0348-325441
· ·	27	. 27	Intreason of the	. kifayatihab				Tajveed S/Alamia	Chitral	1/03/1991	. 08/10/2016	11/03/2017	GHS Pravit	
.	<u> </u>	·	Waliuman	Khalil urrahman	12			Qirut	Chitral	01/03/1984	11/03/2017	11/03/2017	GHSS Arandu	
	28	28	Fayazwali khan	Taiwali khan	12			Qirit		15/05/1988	11/03/2017			
	- 29	29		Shakirullah	12		31	Alamin	Chitral			11/03/2017	GHS Sweer	
	30	30	Abidullah	Muhammad qasiin			· .			25/12/1985	11/03/2017	11/03/2017		
	31	31	Muhammad yasir					B.Ed	Chitral		· <u> \</u>	11/03/2017	GHS Beari	0306-5504578
		<u> </u>		Abdulhag	1	MA .				10/03/1987	11/03/2017	11/03/2017	" GHS Binr	0320-9619956
,. .	32	32	Muhammid .		. l'		<u></u>		Chitral		28/03/2017	-28/03/2017	GHS Broze	0346-9894009
· •	<u>ان ا</u>	1	anwarutting	Aziz ullah	. 1			S/Alamia >	Chitral		A 102 0017	24/03/2017		
	33	33	Anavaturtaluman	Muhammad tahir	1			- S/Alamiaqirat	^ Chitral		· · ·			
14 L	34	34	Meluuhabdulhaq	Mirajul din		2 FAS			<u> </u>	<u> </u>				
	<u> </u>	1 35	Intinzud din	Willingur um	.]	· · ·		l						
•	1 24	1		· · · · · · · · · · · · · · · · · · ·						· · · · · · · · · · · · · · · · · · ·			وسترشيس ببدان العبا	

1

24 C

35

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ESS & CUITRAL. ORDER

(In the recommendation of Departmental Selection Committee in its meeting held on 17.2.2009, appointment of the following Daries (Male) is hereby ordered in BPS-7 (3530-190-7230) plus usual allowances as almosthe under the role with effect from their taking over charge (but not prior to 1.3.2009), in the best interest of public service, subject to the terms and cunditions noted below:

N No .	Name and parentage	address -	Merit order	Place of posting	- Remarks
TV -	Abdummad (brahim S/C) Rahim Khun,	Bean	1	GH3 Madaklasht	A.V.P
	Attaullah S/D Abdul Qadir.	Gahirat	2	GHS Shoghor	A.V.Post
<u>; </u>	Fazle Rabbi S/O Wazir Klian,	Parpish	4	GHS Moroi	A'V Past I:
$\overline{\mathbb{Q}}^{-}$	Abdus Saboor Khan S/Q Sahib Nuor Khan,	Shishikah	5	GHS Birganisar	A.V.Post
0	Sultan Ahmad Shah S/O S.Ahmad Shah,	Ayun ·	6	GHS Domily argenti	A.V.Post
<u>h</u>	Astirated Din S/O Aziz Murat.	Werkup	7	GHS Itech	A.V.Post
7	Mirza Wali S/O Blafed	К	8	GHS Sonoghor	A.V.Post
8	Najeenuul Din S/O Mir Abdul	Khot	9	GHS Brep	A.V.Past
∇	Mohammad Tahir S/O Fazel Qayoni	Mustajanan- deh	69/Decensed cmp: son	GHS Arkari	A.V.Posi

TERMS AND CONDITIONS.

- AND CONDITIONS. Their appointment is parely temporary and they are liable to templation at any line. They will be governed by such rules/regulations issued by the Government-from time to time. Their service will be considered as regular but without pension/grataity in terms of section 19 of the NWFF tivit services will be considered by NWFP Civit services anothered ACT 2005. А.
- Hery will contribute towards CP bond at the prescribed rate & contribution at the same rate will be made by the Government in her of pension.
- the traverment in tree of pension. The feesh candidates should produce Health & Age certificate from the M.5 DHQ Hospital Chitral. Their appointment is subject to verification of Degrees/Certificates/Asnee's from the concerned. Universities/Boards/institutions, which is already in process. Any disinformation detected later-on will result to their transmission from secure. 6. -1-
- to their termination from service. They will be an probation for a period of two years.
- 7. Charge reports should be submitted to all concerned. S.
- 9.

10.

Librarge reports should be submitted to all concerned. They should take over charge within 15 days after 1.3.2009 (This order will be effective w.e.f. 1.3.2009), otherwise their appointment will stand automatically cancelled. Fithins for transfer before completion of normal tenure and irregularity in duty will result to their disqualification for further service. The epigintees should produce an all dayit on stamp paper in this repart]. In case of any deficiency in pasts being filled up the appointment of conclusion with lesser mierit will stand 'n. automatically cancelle L

12. If age of any fresh cannidate execceds 36 years (including 3 years for back ward area), he may not be handed over charge unless and until he produces sanction to the age relaxation from the competent anthority.

(SAMAD GUL) Executive District Officer EAS Education Chitral.

JEB/Secy/A-3, dated Chinal, the <u>2.4/2. 12009.</u> Hadse No. 1776-75. Copy of the above is forwarded for information to the:-

- District Nazim Chitral. 1.
- District Coordination Officer Chitral. 2
- District Accounts Officer Chitral. э.
- ٩, Principals/HM concerned.
- Atidalle sections (MAI-) local office. 5.
- Candidates concerned. 6.

District Offi East Education Chitral

Annex

OF SE OF THE DISTRICT EDUCATION OFFICER (MALE) CHITRAL. OFFICE ORDER.

in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department No. SO (B&AO) 1-18/E&SE/2012 dated 11/07/2012 and Finance Department endorsement No. SO (FR) /FD/10-22 (E)/2010 dated 16/07/2012 and the approval of the Departmental Selection /Promotion Committee in its meeting held on 16/07/2014. The following (Male) Qaris BPS-12 are hereby promoted to the post of Senior Qari BPS-15 (@ Rs . 8500-700-29500) plus usual allowance as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with effect from 16/07/2014 against the newly up graded Senior Qari BPS-15 Posts:-

· · ·		
S.#	Total No. of Qari Posts duly verified by DAO	62
5.#		20
1	1/3.33 % Share of S Qari	20
. 1	Share of promotion 100 %	
	Already promoted to the post of Senior Qari	13
3.	Alleady promoted to the poor of other	07
4	Post available for promotion	02
5	Promoted to the post of S Qari BPS-15	02
· · · · · · · · · · · · · · · · · · ·		

•						Demorten
r	·	<u> </u>	NI	Father name	Designation	Remarks
	S.#	Sen.#	Name		<u>C</u> Oori	
.	4	47	Sultan Ahmad Shah	Said Ahmad Shah	S Qari	
		47			S Qari	1
	2	51	Muhammad Tahir	Fazal Qayum	O Gui	

TERMS & CONDITIONS.

- 8 They will be on probation for a period of one year extendable for another year.
- 9. They will governed by such rule and regulation as may be issued from time to time by government.
- 10 Their services can be terminated at any time, in case of their performance is found un-satisfactory during
- probationary period. In case of misconduct, he will be preceded under the rules, framed from time to time.
- 11 Charge report should be submitted to all concerned.
- 12 Their inter-se-seniority on lower post will remain intact.
- 13 No TA/DA is allowed for joining their duty.

14 They will give an under taking to this to be recorded in their service books to the effect that if any

overpayment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed. (NISAR MUHAMMAD)

DISTRICT EDUCATION OF FICER, (MALE) CHITRAL. dated 221-712014.

10026-31_/EB (M)/U-1/Upgrd/Qari Endst: NO.

Copy forwarded to the:-

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for information, please. 6

- District Accounts Officer Chitral for information, please. 7
- Headmasters school concerned along with service books. 8
- DEMIS Local office. 9

10 Teachers concerned for strict compliance.

DUCATION OFFICER, DISTRIC (Male) Chitral

BETTER COPY OF THE PAGE NO. 8 OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S E CHITRA

ORDER In pursuance of the Government of Khyber Pakhtuckhwa Elementary & Secondary Education Department No. SO (B&AD) 1-18/E&SE/2012 dated 11/07/2012 and Finance Committee order No. (SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Departmental /SO(FR)FD/10-22 (E)/2010 dated 16/07/2012 and consequent upon the recommendations of Department 14/11/2014 Up-gradation of the following Qari's BPS-12 of Elementary & Secondary Education Department (http://source.com/education/source

	ms and conditions given below,	with immediate ett	ect in the best thick	est or public hereit		
S.		Prev. Posting	Promoted as	Posted/Adjusted	Remarks	• •
1	Designation	Station ·	S. Qari B-15	Retained	Post already	
1.	ShamsurRehmanQari B-12	GHS Reshun	5. Qan 8-15	Tecumite	occupied by	
1.1				·	him	·
	HyderAmanQari B-12	GHS Sweer	S. Qari B-15	Retained	As above	· · · · ·
15	AbdusSaboor Khan Qari B-	the second se	S. Qari	Retained	As above	
4	12 Muhammad IbharimQari		S. Qari B-15	Retained .	As above	
١ <u> </u>	B-12	GHS Istara	S. Qari B-15	Retained	As above	1
1 5	Ashrafud Din Qari B-12		10.00			

TERMS & CONDITIONS

1

2.

3.

4 -5.

. 6.

7.

They will be on probation for a period of one year extendable for another year. They will governed by such rule and regulation as may be issued from time to time by Government. Their services can be terminated at any time in case of their performance found unsatisfactory during probationary period in case of misconduct he will be proceeded under the rules famed from time to

time. Charge report should be submitted to all concerned.

Their inter so sonority on lower post will remain intert. No TA/DA is allowed for going their duty. They will give an undertaking to this to be recorded their service books to the effect that if any overpayment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

Before handing over charge once again their documents may be checked, if they have not the relevant qualification as per rules, they may not be handed over charge of the post.

(Moin-ud-Din Khattak) District Education Officer

(Male) Chtiral

•

BEFORE THE KHYYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SA No. 1875/2023

Mr. Muhammad Ibrahim Senior Qari BPS-15 GHSS Drosh District Lower Chitral,

APPELLANT

Versus

- 5. Director Elementary and Secondary Education of Khyber Pakhtunkhwa Peshawar.
- 6. District Education Officer Chiral lower.
- 7. Sultan Ahmad Shah Senior Qari GHSS Ayun District Lower Chitral
- 8. Abdul Saboor Khan Senior Qari GHS Birganissar District Lower Chitral.

.. RESPONDENTS

AFFIDAVIT

Mr Mahmood Ghaznavi DEO (M) Lower Chitral do Hereby solemnly affirm and declare on oath that the contents of accompanying para wise comments on behalf of the respondents No. 1 & 2 ore true correct to the best of my knowledge and belief and nothing has been concealed from

Identified exporte northeir defense have been Add: Advocate General

Deponent



2 2 NOV 2023