

23-04-2024

At Camp Court about d

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12299

Dated 19-4-2024

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

Service Appeal # 487/2024

Mr. Zulfiqar Ahmad.....Appellant.

VERSUS

Govt: of Khyber Pakhtunkhwa & others.....Respondents.

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Deponent

○

**BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR**

**Service Appeal # 487/2024**

**Mr. Zulfiqar Ahmad..... Appellant**

**VERSUS**

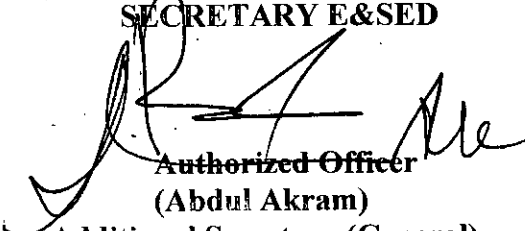
**Govt. of Khyber Pakhtunkhwa & others..... Respondents**

**AFFIDAVIT**

I, **Masood Ahmad**, Secretary, Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

**It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off.**

**(Masood Ahmad)  
SECRETARY E&SED**

  
**Authorized Officer  
(Abdul Akram)  
Additional Secretary (General)  
E&SE Department  
(Respondent No. 01 & 02)**

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**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**Block "A" Civil Secretariat, Peshawar**

**Phone No. 091-9211128**

**AUTHORITY LETTER**

It is certified that **Mr. Sajid Ullah, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar **Service Appeal # 487/2024 Case Titled Mr. Zulfiqar Ahmad vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.**

**(Masood Ahmad)  
SECRETARY E&SED**

**Authorized Officer  
(Abdul Akram)  
Additional Secretary (General)  
E&SE Department  
(Respondent No. 01 & 02)**

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

**In Service Appeal No. 487/2024**

**Mr. Zulfiqar Ahmad.....Appellant**

**VERSUS**

**Chief Secretary to Govt of KPK Peshawar..... Respondents**

**PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. 01, 02 & 03**

**Respectfully Sheweth,**

**Preliminary Objections:**

1. That according to Honorable Peshawar High Court Peshawar judgment on dated 18-11-2009 in writ petition No. 2937/2009. It has been observed that it is not befitting for teachers to hold administrative posts because they are getting benefits, but the students are suffering thus, they shall go to their respective places. Therefore, the present appeal is liable to be dismissed summarily.
2. That the Respondent has adopted the proper law and procedure by exercising powers u/s 10 of Civil Servant Act, 1973, which is as under:-

**“10. Posting/Transfer every civil servant shall be liable to serve anywhere within or outside the Province in any post under the Federal Government, or any Provincial Government or local authority, or a corporation or body set up or established by any such Government.**

**Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region:**

**Provided further that where a civil servant is required to serve in a post outside his service or cadre, his terms and conditions of service as to his pay shall not be less favorable than those to which he would have been entitled if he had not been so required to serve”**

Therefore, in light of Section-10, desired posting is not the perpetual right of a civil servant and the department concerned can transfer any civil servant to serve at the given place as mentioned in the transfer/posting order, while the civil servant cannot refuse compliance.

3. That according to Central Administrative Tribunal-Delhi in the case of Sh. Jawahar Thakur-vs-Union of India held on 19<sup>th</sup> June, 2015 that it is more than stare decisis that transfer is an incidence of service and it is for the executive/administration to decide how to and where to use its employees subject to the conditions of their appointment in the best interest of the organization and public service. It is not always possible and feasible to record strong reasons for allowing an officer to continue at a particular station for a few years or more or less.
4. The Honorable Supreme Court in Mrs. Shilpi Bose and Others vs State of Bihar and others 1991 Supp.(2)SCC-659 went into in the issue of guidelines and has upheld the transfer orders of the employee in the following words:-

(4)

**“In our opinion, the Courts should not interfere with a transfer order which are made in public interest and for administrative reasons (unless the transfer orders are made in violation of any mandatory statutory rule or on the ground of mala fid. A Government servant holding a transferable post has no vested right to remain posted at one place or the other, he is liable to be transferred from one place to the other. Transfer orders issued by the competent authority do not violated any of his legal rights. Even if a transfer order is passed in violation of executive instructions or orders, the Courts ordinarily should not interfere with the order instead affected party should approach the higher authorities in the Department. If the Courts continue to interfere with day to day transfer orders issued by the Government and its subordinate authorities, there will be complete chaos in the Administration which would not be conducive to public interest. The High Court over looked these aspects in interfering with the transfer orders”**

Therefore, in light of the above situation the present appeal is not maintainable and liable to be dismissed with costs.

5. The appellant has not come to this Tribunal with clean hands.
6. The appellant is not an aggrieved person nor has any locus standi to file the present appeal.
7. That the appellant has concealed material facts from this Tribunal.
8. That the appellant is estopped by his own conduct to file the present appeal.
9. That the present appeal is against the prevailing law and rules.
10. That the appellant is not entitled for any relief, he has sought from this Honorable Tribunal.
11. That the present appeal is liable to be dismissed being devoid of any merits.
12. That the present appeal is hopeless time barred, hence liable to be dismissed.
13. That the present appeal is just filed by the appellant to pressurized the respondents for getting illegal and unlawful benefits.
14. That the appellant is just wasting the precious time of this Honorable Tribunal through the instant frivolous appeal.
15. In an another famous case, The State of U.P. and Others vs Goverdhan Lal, : 2004 (3) SLJ 244 (SC) it has been held this:

**“It is too late in the day for any Government servant to contend that once appointed or posted in a particular place or position, he should continue in such place or position as long as he desires. Transfer of a civil servant is an essential condition of service in the absence of any specific indication to the contra, in the law governing or conditions of service”**

Therefore, the appeal in hand is liable to be dismissed.

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**Reply on Facts.**

1. Pertains to service record of the appellant.
2. Pertains to record.
3. Para -03 is incorrect. The appellant has been found in Mal and corrupt practices during his posting as ASDEO (Circle Dhamtour) sub division District Abbottabad. The appellant and his friend has committed cheating by personation with PTC council of GPS Nari Hoter. (Detail inquiry report is annex-A which consists of four pages).
4. Pertains to record.
5. Incorrect, hence denied.
6. Incorrect, hence denied. The appellant has been given new task on 21-02-2024 through notification No. SO(MC)/E&SED/4-16/2024/PT/MC/SDEO according to his own cadre i.e. Teaching Cadre.
7. Incorrect, hence denied. The notification No. SO(MC)E&SED/4-16/2024/PT/MC/SDEO dated 21-03-2024 was duly issued on 21-03-2024 in result of an inquiry as annexed above conducted against the fraud and cheating by personation of the appellant and his friend.
8. Incorrect, the appellant is not an aggrieved person.
9. In response of Para-09 it is stated that the appellant belongs to Teaching Cadre, while the post of ASDEO is Management Cadre, secondly the appellant is not trustworthy for any administration post due to his Mal & corrupt practice as stated above. Therefore, the appellant is not entitled for any relief.

**On Grounds:**

- a) Incorrect, hence denied. The appellant on one hand is involved in cheating by personation alongwith abetment and on the other hand the appellant does not belongs to Management Cadre. Therefore, notification dated 21-03-2024 is in accordance with law.
- b) Incorrect, hence denied. Already explained above.
- c) Incorrect, hence denied. Already explained above.
- d) Incorrect, hence denied.
- e) Incorrect and denied in toto. The appellant has made mis-representation before this Honorable Tribunal no doubt the appellant is involved in cheating by personation alongwith abetment and also the appellant do not belongs to Management Cadre.
- f) Incorrect, hence denied. Already explained above.
- g) Incorrect, the appellant has been treated in accordance with law.
- h) Incorrect, hence denied in toto.
- i) Incorrect, hence denied. The actual position has been explained above.
- j) Incorrect, hence denied.
- k) Incorrect, the case of the appellant is altogether different from the referred judgment and therefore is not liable for any relief.
- l) No need to reply.

⑥

- m) The respondent also seeks for permission to raise additional grounds at the time of arguments.
- n) Incorrect, the appeal is time barred.

**It is therefore, most humbly requested that the appeal in hand may kindly be dismissed with heavy cost being merit less.**

**(Masood Ahmad)  
SECRETARY E&SED**



**Authorized Officer  
(Abdul Akram)  
Additional Secretary (General)  
E&SE Department  
(Respondent No. 01 & 2)**

⑦

## INQUIRY REPORT

Reference Assistant Director Elementary and Secondary Education is  
Punjab Government No. 2435-26-26-6/Complaint dated 18-09-2021 regarding payment of Rs. 800,000/-  
to PSHT Government Primary School Nari Hoter Abbottabad

### INQUIRY TEAM

- i. Dr. Muhammad Javed Principal GHS Naku Abbottabad
- ii. Muhammad Shauqez ADEO Sports office of DEO Male Abbottabad

Consequent upon the unpost inquiry the concerned team visited the venue GPS Nari Hoter  
DC Dirate on 20-09-2021 and visited the following characters, reports and files and inspected the matter  
by one with affiance statements in detail

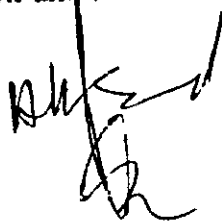
### MAIN CHARACTERS

- i. Muhammad Shakeel SPST Ex Secretary PTC GPS Nari Hoter
- ii. Muhammad Arshad Ex Head Teacher GPS Nari Hoter
- iii. Aziz Ul Rehman Ex chairman PTC GPS Nari Hoter
- iv. Muhammad Shauque Abbasi Member PTC GPS Nari Hoter
- v. Muhammad Haqiq present HT GPS Nari Hoter
- vi. Sajid Melunood Abbasi Witness of payment receipt HT GPS Farnotian Berote
- vii. Mr. Khan Govt. Contractor, village Bagh

### FACTS:

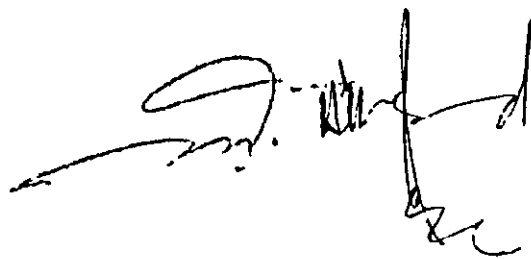
The said inquiry committee found/realized the facts given below.

- a) Rs. 800,000 was shifted in PTC account of GPS Nari Hoter Berote for the year  
of ACR in the year 2015-16 from GPS Majhot. See Annexure (A)
- b) Mr. Arshad Abbasi Ex PSHT was not agreed for construction due to his post  
against SSI post. See Anx. (B)
- c) That Mr. Arshad Abbasi was relieved off after his promotion and Shakeel  
SPST was transferred and took charge against PSHT in GPS Nari Hoter
- d) That the presence of conditional grant in PTC account for construction of ACR  
in the knowledge of ASDEO circle Berote. Anx (B)
- e) That the ASDEO circle reached in school along with a stranger who was  
to the PTC council of GPS Nari Hoter as C&W registered contractor  
Muhammad Yousuf. Anx (B&C)
- f) That the ASDEO circle convinced the HT & PTC council for construction  
through the said stranger as contractor named Muhammad Yousuf. See Anx (B)
- g) That the ASDEO circle not only convinced the PTC but also presented the  
full plan of construction and method of payment to contractor Muhammad Yousuf.  
See Anx (B, C & D)





- b) That all the things related to constructions were sealed amongst the ASDEO circle, PTC council & contractor Muhammad Yousuf verbally on the trust and confidence of ASDEO circle. See Anx (D)
- i) That the HT and chairman PTC made advance payment of Rs. 200000/- in cash to Muhammad Yousuf on verbal instructions, of ASDEO circle on 24-07-2017 See Anx(E)
- j) That the contractor started work and deployed his labour on site. After 17 days the contractor demanded more release of amount (Rs.200000) but HT refused to pay said payment. The ASDEO pressurized the HT through telephonic call, ordered him to pay next release See the statement of Muhammad Shafique Abbasi Member PTC Anx(F).
- k) That the complainant labours were deployed on the site for starting construction of Additional classroom. These labourers were introduced to Mr. Zulfiqar (ASDEO) by Kala Khan (contractor) in TMA office Abbottabad. Detail attached in Kala Khan Statement Anx(G)
- l) That this labour firm was handed over to contractor Muhammad Yousuf (original name Muhammad Muneer) by concerned ASDEO circle and sent to the venue (GPS NariHoter and after all construction planning finalized amongst PTC Chairman, Haza Teacher and labours, work was started and reached at roofing stage after 40 days as per the statement of labours attached. Anx (H)
- m) When the labourers demanded money for roofing expenditure, HT told them that their contractor Muhammad Yousuf had already received Rs. 450000 from him Anx. (H)
- n) The poor labours firm was surprised to listen this because they did not know any contractor but HT affirmed him that he knew their contractor, his name is Yousuf lives in Abbottabad and they should not need worry. The labourers returned their home after three days they came back to work but no payment was made to them and they once again returned back home. See Anx. (I)
- o) That this inquiry committee found two receipts amounting of Rs. 200000 & 250000 copy from HT teacher Shakeel Abbassi of payment made to contractor Muhammad Yousuf signed by two witnessed. See Anx. (I&J)
- p) That the inquiry committee submitted a questioner to ASDEO circle See Anx. (K)
- q) That the ASDEO circle did not reply any question clearly and tried to hide the facts For example, in reply to 1<sup>st</sup> question he mentioned only date not mentioned his post because he joined Education Department as a Junior Clerk. In reply of other question, he did not give any importance to the questionnaire. See his replies in Anx. (L)

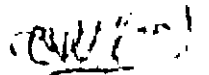
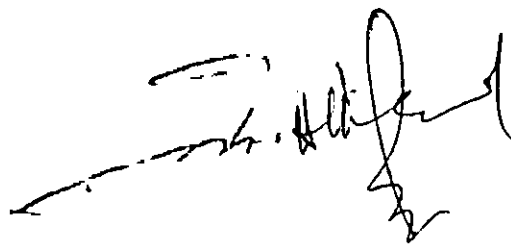


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In the light of above facts, the findings of this inquiry team are given below:

The inquiry team checked the Cell No. of Muhammad Yousaf through CDR and found that his original name is Muhammad Muneer son of Muhammad Siddique village bin... Nagri Tutial Teasit Lora Distt. Abbottabad. CDR is attached in Anx (M) This team inquired through its own sources about him in his native village and came to know that he is a great cheater and migrated to Karachi to disappear himself due to fraudulent character

- b) This inquiry team concluded that ASDEO circle hired Muhammad Yousaf to receive the PTC amount fraudulently. For this purpose a drama was created and Mr. Muneer played the role of contractor with the name of Muhammad Yousaf and got the trust of Mr. Shakeel SPST GPS Narni Hotel and PTC of GPS Narni Hotel. The PTC council GPS Narni Hotel paid the cash on the pressure and confidence of ASDEO circle including wages of complainant labourers.
- c) The ASDEO circle succeeded to get amount fraudulently and pressurized/threatened the teacher to complete the construction work by using his administrative powers. The said teacher sold the Ornaments of his wife and completed the construction of ACR
- d) All the evidences and statements of spots are against the ASDEO circle and show that he handed over the amount of PTC (Rs.450000) with technical mind through a fake contractor.
- e) This inquiry committee called him for personal hearing in the light of his answer of last question but he did not justify any question of inquiry committee and behaved roughly and proudly with committee.
- f) In personal hearing the Ex ASDEO Zulfiqar Ahmed SST (G) GHSS No. 1 Abbottabad claimed that he neither knows the complainant labourers nor labourers know him. This enquiry committee demonstrated and identity parade to justify all the blames and evidences secretly. The complainant labourers were called to DEO office where the ASDEO was already present and sitting in superintendent office. The labourers were said to search the ASDEO in all rooms of DEO office and point out his presence in any room. The labourers entered in the building of DEO office and returned after two or three minutes with pointing out his presence in superintendent office. In personal hearing the ASDEO claimed that he doesn't know the complainant labour and the Complainant labour also don't know him.
- g) 2 or 3 inquiries have been conducted before this inquiry which conclusion came to ends without acknowledgment of originality of contractor Muhammad Yousaf original name Muhammad Muneer
- h) This inquiry proceeded due to CDR report and disclosed the originality of fake contractor which was already beneficiary of accused ASDEO Zulfiqar Ahmed SST (G) GHSS No. 1 Abbottabad.



(10)

RECOMMENDATION

- In the light of above facts and finding this inquiry committee recommends-
- a) That the amount of waging of complainant labour should be recover from Ex ASDEO circle Mr. Zulfiqar Ahmed SST GHS No. 1 Abbottabad and be paid to the poor labour.
  - b) The Assets of Ex ASDEO Mr. Zulfiqar Ahmed SST GHS No. 1 should be inquired through Anti-Corruption Department and National Accountability Bureau from his career as a Junior Clerk to SST (G) and ASDEO Circle Biret and till date.
  - c) Due to misusing of authorities and departmental power the accused person (Ex ASDEC Biret) should be treated according to E&D rules.
  - d) Mr. Zulfiqar Ahmed should be declared/notified by the directorate of Elementary and Secondary Education Department Peshawar to disqualify and unfit for such any administrative post in Education Department in future through any source.
  - e) Minor penalty stoppage of one increment should be imposed on Mr. Shakeel Abbasi SPST GPS Nari Hoteer due to his negligence, Mr. Sajid Abbas PSH. GPS Tarmothian Biret should be warned strictly for playing role of agent of officers like said ASDEO.
  - f) An FIR should be launched against fake Contractor Mr. Ycusuf original name Maneer S/O Muhammad S. cique village Biannani UC Nagai Tltial to arrest him due to his fraud in Police Station Lora or Anti-Corruption Department.

Report is hereby submitted to all concerns for further necessary action with attached all record/documents please.

Dr. Muhammad Javeed  
Chairman Inquiry Committee  
Principal GHS Kakul

Assistant District Officer (M) Abbottabad  
Muhammad Shamrez  
Member Inquiry Committee  
ADEO Sports DEO Male Abbottabad

Dr. Muhammad Javeed  
Principal  
G.H.S Kakul Abbottabad

Assistant District Officer  
  
District Education



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No. SO (MC) E&SED/2-3/2024/DA/Zulfiqar Ahmed  
Dated: 1<sup>st</sup>, April, 2024

To

Mr. Zulfiqar Ahmed,  
Under transfer to GHS Pattan Khurd Abbottabad.

17/4  
11/4/24

Subject: - **DEPARMENTAL APPEAL AGAINST THE TRASNFER NOTIFICAION  
NO. SO(MC) E&SED/4-16/2024/MC/SDEO: DATED 21 MARCH, 2024.**

I am directed to refer to the subject noted above and to state that your departmental appeal No. Nil dated 26.03.2024 regarding cancellation of posting order examined and found not maintainable, hence, filed.

(ARSALAN AHMED)  
SECTION OFFICER (Management Cadre)

**Endst: Even No. & Date:**

Copy forwarded to the:-

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

SECTION OFFICER (Management Cadre)

attested

Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa;



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9210626

Dated, the Peshawar 21<sup>st</sup> March 2024

**NOTIFICATION**

**NO.SO/MCIE&SED/4-16/2024/PT/MC/SDEO:** The following posting / transfers are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name of officer	From	To
1.	Mr. Zulfiqar Ahmad, (TC BS-16)	ASDEO Circle Dhamtor Abbottabad	GHS Pattan Khurd Abbottabad
2.	Mr. Jaffar Rehman, (TC BS-16)	ASDEO (Primary) DEO (Male) Office Abbottabad	ASDEO Circle Dhamtor Abbottabad vice serial No. 1
3.	Mr. Arshad Masood, (TC BS-16)	GMS Sialkot Abbottabad	ASDEO (Primary) DEO (Male) Office Abbottabad vice serial no. 2

2. Consequent upon above, Mr. Imran Khan, MC BS-16 under transfer as ASDEO (Male) Circle Dhamtor Abbottabad posted vide Notification No. 2272-76/H-1/ADEOs (M)/Transfer Haripur, dated 21-03-2024 is hereby directed to report to Directorate of E&SE for further posting.

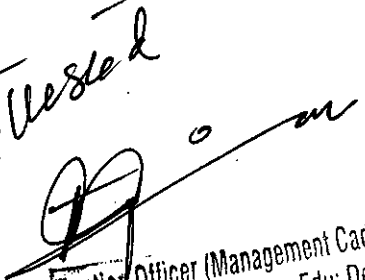
SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) concerned.
4. District Account Officer concerned.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. PS to Minister E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. SDEO (Male) concerned.

  
(ARSALAN AHMED) 21/3/24.  
SECTION OFFICER (Management Cadre)

  
Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt:  
Govt. of Khyber Pakhtunkhwa

(B)

To

**The Worthy Secretary  
(E&SED) Khyber Pakhtunkhwa**

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED TRANSFER NOTIFICATION  
NO.S0 (MC) E & SED/4-16/2024/ PT/MC/SDEO: DATED 21 MARCH, 2024.

Respected Sir,

It is submitted to your gracious honors:

1. That the appellant was appointed as SST vide Director E&SED under Endst No. 646-769/FILE No. 2/A-14/SST/PSC/APTT: dated 3/3/2012. in line with the recommendation of PSC. (Copy of Notification attached as Annexure "A")
2. That the appellant was performing his duties very amicably as SST at GHSS No 1 Abbottabad, the department has assigned the duty of ASDEO Circle Dhamtour vide Endst No. 3060-65 EB/I/ADEO/ dated 06-05-2023, Without my any application for it, Both the duties station i.e No.1 GHSS Abbottabad and circle Dhamtour was near to my residence. I rendered my new assignment whole heartedly, very actively considering it as national service that was acknowledged by worthy Director and by your good self. (Copies of Adjustment Order and best performance certificates are attached herewith as Annexure "B & C")
3. That the tenure of the appellant was less than one year, but the performance was evident that the appellant was appreciated by your good self and Worthy Director (E&SED) twice times.
4. That there is complete ban on all kinds of Posting/ Transfer in (E&SED) till further order vide Notification dated 22-03-2024. (Copy of Notification is attached as Annexure "D")
5. That inspite of ban on posting / Transfer in (E&SED), the appellant was astonished to see two transfer Orders on 25-3-24 at dawn circulating in social media. The station at which the appellant is adjusted/ posted is about 225 KM away from his residence. (Copies of both Notifications of Same date are attached as Annexure "E & F")

*examined  
P/posen*

*BB  
27-3-24  
DSE  
SOME*

*26/03/24*

*27/3*

OFFICE OF SECRETARY E&SE DEPTT:

Diary No. 37

Dated 26/3/2024

*Attended*  
*[Signature]*  
Section Officer (Management Cadre)  
Elementary & Secondary Deptt.  
Govt. of Khyber Pakhtunkhwa

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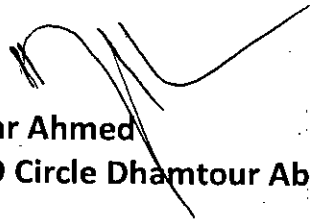
6. That according to 2009 Education policy ASDEO/ ADEO post belongs to Management Cadre, due to non availability of MC ASDEO, SST can be posted/ adjusted against the vacant post on stop-gap arrangement, but in the case of appellant another junior SST named Arshad Masood & Jaffer Rehman, who are not MC ASDEO were replaced with appellant due to political influence.
7. That an other blunder that was made in issuing the transfer order by E&SED notification No.SO (MC) E &SED/4-16/2024/ PT/MC/SDEO: dated 21/03/2024 is the hierarchy of authority. As per APT rules 1989, The Director (E&SED) is the Competent authority of posting /Transfer of BPS-16 not the worthy secretary (E&SED). (Copy of APT rule 1989 is attached herewith as Annexure" G")

**In view above mentioned facts, it is requested to your gracious honors "That instant departmental appeal of the appellant may be accepted and impugned notification No.SO (MC) E &SED/4-16/2024/ PT/MC/SDEO: dated 21/03/2024 be set aside/ withdrawn please.**

I shall be very obliged for your act of kindness.

Dated: 26/03/2024

**Your sincerely**



**Zulfiqar Ahmed  
ASDEO Circle Dhamtour Abbottabad.**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

Dated Peshawar, the 15-03-2024

**NOTIFICATION**

**NO.SO(Lit-II)/E&SED/1-5/2021.** The undersigned is pleased to authorize Additional Secretary (General) Elementary & Secondary Education Department to sign parawise comments, replies, implementation reports, objection petitions, civil miscellaneous applications etc on my behalf for submission before various courts of law/tribunals in the best public interest.

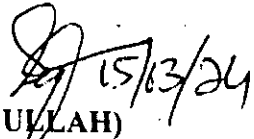
**SECRETARY**  
Elementary & Secondary Education  
Department, Khyber Pakhtunkhwa

Endst: No. 2519-B

Dated 15-3-2024

Copy forwarded to the:-

1. Chief Secretary Khyber Pakhtunkhwa.
2. Advocate General Khyber Pakhtunkhwa.
3. Secretary Law Department.
4. Registrar Peshawar High Court Peshawar.
5. Registrar Service Tribunal Peshawar.
6. All Section Officers (Litigation) E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (General) E&SE Department.
9. PAs to Deputy Secretary (Legal-I&II) E&SE Department.

  
(SAJID ULLAH)  
SECTION OFFICER (Lit-II)