


FORM OF ORDER SHEET

Court of _____

Appeal No. 1436/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11-Sep-24	<p>The appeal of Mr. Waqas Ahmad presented today by Mr. Sardar Waqar ul Mulk Advocate. It is fixed for preliminary hearing before Single Bench at Abbottabad on 23-Sep-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1436 of 2024
Waqas Ahmed APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through
Secretary Elementary and Secondary
Education, Peshawar etc. RESPONDENTS

SERVICE APPEAL

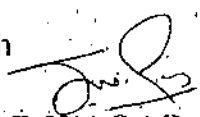
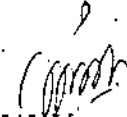
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Dated 24.07.2024

Waqas Ahmed
... Appellant

Through



SARDAR WAQAR-UL-MULK,
SARDAR WAJIH-UL-MULK,
Advocates High Court,
Mansehra.

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

Service Appeal No. 1436 ⁰ of 2024

Waqas Ahmed son of Aurangzeb resident of near Kohisar Flour Mills, Mohallah Upper Channai, Mansehra, Tehsil and District Mansehra presently Senior Clerk/Stenographer, District Education Officer (Female), Mansehra **APPELLANT**

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Mansehra..... **RESPONDENTS.**

**SERVICE APPEAL UNDER SECTION 4
OF KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED OFFICE ORDER BEARING
ENDST. NO.4395-4405 DATED 14.05.2024
ISSUED BY THE RESPONDENT NO.2
WHEREBY THE APPELLANT WAS
TRANSFERRED FROM THE OFFICE OF
DISTRICT EDUCATION OFFICER
(FEMALE), MANSEHRA AND KEPT AT
THE DISPOSAL OF DIRECTORATE OF**

E&SE AND MONTHLY SALARIES OF
THE APPELLANT WAS ALSO
WITHHELD AND AGAINST THE NON-
IMPLEMENTATION OF THE OFFICE
ORDER BEARING NO.834-37/F.NO.343/
A-23/MS/TRANSFER/MANSEHRA DATED
02.08.2024.

PRAYER: -

On acceptance of the instant service appeal, impugned office order bearing Endst. No.4395-4405 dated 14.05.2024 issued by the respondent No.1 may please be set aside and the respondents especially respondents No.2 and 3 may please be strictly directed to implement the office order dated 02.08.2024 in its true letter and spirit or any other order or relief as this Honourable Court deems fit and appropriate in the circumstances of the case, may also be issued/passed.

Respectfully Sheweth!

1. That, the appellant is a bonafide resident of district Mansehra.

(Copy of the CNIC of the appellant is annexed as annexure "A").

2. That, the appellant was duly inducted in the respondents' department as Junior Clerk after fulfillment of all the legal and codal formalities and since his appointment, the appellant is working with great zeal and zest.

(Copy of the service book of the appellant is annexed as annexure "B").

3. That, later on, the appellant was duly promoted by the Director Elementary and Secondary Education, Peshawar vide promotion order Endst. No.5352-5432 dated 01.11.2022 and after such promotion, the appellant was posted at Government Higher Secondary School, Kaghan and in consequence of the said order, the appellant duly took over the charge of the said post and started to perform his duty.

(Copies of the promotion order alongwith charge assumption report are annexed as annexure "C").

4. That, as the appellant is a disable person and also the resident of District Mansehra, therefore, the

appellant submitted an application Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar for his adjustment at nearest station i.e. at the post lying vacant in the office of District Education Officer (Female), Mansehra and later on, the appellant got NOC from both the offices i.e. District Education Officer (Male) and District Education Officer (Female), Mansehra and the same was submitted to Director, Elementary and Secondary Education, Peshawar.

(Copies of the application alongwith NOC are annexed as annexure "D").

- 5. That, in the light of the appellant's application, the appellant was adjusted against the post of Senior clerk/Stenographer in the office of District Education Officer (Female), Mansehra vide office Endst. No.9027-29 dated 10.10.2023.

(Copy of the order dated 10.10.2023 is annexed as annexure "E").

- 6. That, the appellant in response to the office order dated 10.10.2023 duly took over the charge against the post

of Senior Clerk/Stenographer and started to perform his duties.

(Copy of the charge assumption report is annexed as annexure "F").

7. That, the ink of the office order dated 10.10.2023 has not been dried in the meanwhile, the respondents issued impugned office order bearing No.4395-4405 dated 14.05.2024 whereby the appellant was transferred from the office of District Education Officer (Female), Mansehra and kept at the disposal of Directorate, Elementary and Secondary Education, Peshawar although the appellant has made arrival at Directorate office but the appellant is suffering from severe physical and mental agonies.

(Copy of the impugned office order dated 14.05.2024 is annexed as annexure "G").

8. That, the appellant feeling himself aggrieved from the impugned office order dated 14.05.2024 submitted a departmental appeal to Secretary, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar which is still unattended to.

(Copy of the departmental appeal is annexed as annexure "H").

9. That, the appellant feeling himself aggrieved from the impugned office order issued by the respondent No.2 filed a Writ Petition before the Honourable Peshawar High Court, Bench Abbottabad which was listed before the Honourable Court who was pleased to dispose off the Writ Petition with the direction to treat the same as departmental appeal and decide the same within 15 days.

(Attested copies of Writ Petition alongwith order are annexed as annexure "I").

10. That, upon the order of the Honourable Peshawar High Court, Bench Abbottabad, the respondents adjusted the appellant against his respective post in the office of District Education Officer (Male), Mansehra vide office order bearing No.834-37/F.No.343/A-23/MS/Transfer/Mansehra dated 02.08.2024.

(Copy of the office order dated 02.08.2024 is annexed as annexure "J").

11. That, in consequence of the above stated order dated 02.08.2024, the appellant duly made his arrival against his post twice but the respondent No.3 straightaway refused to accept the arrival report of the appellant.

(Copies of arrival report are annexed as annexure "K").

12. That, the appellant feeling himself aggrieved filed an appeal for compliance of office order dated 02.08.2024 but the respondent No.3 instead of complying with the office order in its true letter and spirit, wrote a letter dated 20.08.2024 to the respondent No.2 upon which circular regarding implementation of orders/ notifications/instructions was issued whereby strict direction for implementation on the office order were issued.

(Copies of the appeal alongwith circular dated 15.08.2023 are annexed as annexure "L" & "M").

13. That, despite clear cut direction issued by the respondent No.2 the respondent No.3 did not acted upon

the office order dated 02.08.2024 hence the appellant was constrained to file second appeal for adjustment.

(Copy of the second appeal is annexed as annexure "N").

14. That, the appellant also produced post availability certificate to the respondent No.3 but still the respondent No.3 is reluctant to implement the office order dated 02.08.2024.

(Copy of the post availability certificate is annexed as annexure "O").

15. That, the appellant being aggrieved from the impugned actions/in-actions of the respondents seeks the gracious indulgence of this Honourable Court by way of instant service appeal, inter alia, on the following grounds: -

GROUNDS

- i. That, the impugned office order bearing Endst. No.4395-4405 dated 14.05.2024 is wrong, illegal, against the law and facts, arbitrary, fanciful,

perverse hence being not maintainable in the eyes of law, liable to be set aside.

- ii. That, it is an admitted fact that upon the appeal of the appellant, the impugned office order dated 02.08.2024 was issued whereas the appellant was adjusted against the post of Senior Clerk in the office of District Education Officer (Male), Mansehra but despite twice appeals, the grievances of the appellant have not been redressed by the respondents rather the appellant has been made rolling stone by the respondents and such act of the respondents is highly condemnable and deplorable.
- iii. That, it is also an admitted fact that the appellant has produced post availability certificate to the respondents and perusal of such certificate clearly shows that the post is lying vacant with the respondents and despite availability of the post, non-adjustment of the appellant does not appeal to a prudent mind rather smacks malafide on the part of the respondents.

- iv. That, in consequence of the office order dated 02.08.2024, the appellant also made arrival reports twice but the same has not been adhered to by the respondents whereas, as per law, the respondents were bound under the law to accept the arrival reports of the appellant hence very such act of the respondents is against the relevant law, rules and regulations.
- v. That, it is also an admitted fact that the appellant has duly been appointed by the respondents' department and there is no any legal defect in the appointment of the appellant. Similarly, it is also an admitted fact that the appellant was later on adjusted against the impugned post by the respondents in the light of the office order dated 10.10.2023 and there is no any legal defect in issuance of the adjustment order of the appellant hence no authority rests with the respondents to pass any other detrimental to such adjustment order of the appellant.
- vi. That, it is also an admitted fact that the tenure policy for posting and transfer has duly been introduced by

the respondents' department and as per tenure policy, least tenure for posting at any post is 2/3 years whereas in the matter in hand, the appellant has been transferred after 06 months of the office order dated 10.10.2023 thus the impugned office order dated 14.05.2024 has been issued in clear violation of the tenure policy of the education department and thus the same has no legal sanctity in the eyes of law.

vi. That, the impugned office order dated 14.05.2024 has not been issued in public interest rather the same is the result of political influence and that too in clear violation of the relevant law, rules and regulations hence the impugned office order has no legal footings to stand upon. Similarly, non-implementation of the office order dated 02.08.2024 also speaks loud regarding the political victimization of the appellant by the respondents.

vii. That, the impugned office order has been passed without any allegations/ reason and without consideration of any sound justification and grounds but on personal grudges, the

impugned office order has been passed/issued.

- viii. That, no legal, valid or legitimate justification has been given/record by the respondents in support of the impugned order rather the respondents while considering them above the law has issued the impugned office order.
- ix. That, it is well settled by now that the political figures have nothing to do with the transfer and posting of the employees whereas in the matter in hand, the respondents while making themselves pawn in the hands of the political figures have passed/issued the impugned order without adopting the relevant law, rules and regulations.
- x. That, there are no any administration disciplinary or other grounds exist with the respondents to disturb the service of the appellant under the garb of the impugned office order. Similarly, there is no any public or departmental complaint of misconduct against the appellant nor there is any criminal case against the appellant.

- xi. That, the appellant has never been afforded an opportunity of being heard rather the respondents without any rhyme and reason and without any fault on the part of the appellant have issued the impugned officer order just to make happy the political figures of the area.
- xii. That, height of injustice is that at one hand, the services of the appellant has been disturbed by the respondents' department whereas on the other hand, the respondents are bent upon to stop/withheld the monthly salaries of the appellant which is also a mockery with the helplessness of the appellant as there is no any fault or negligence on the part of the appellant regarding performance of duties.
- xiii. That, the appellant hails from a poor family of the locality and the salary is the only source of earning of the appellant's family and in case if the salary of the appellant has been stopped then not only the appellant but his family would also be disturbed and similarly, stoppage of salary also

effects the future service rights of the appellant.


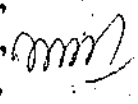
- xiv. That, by keeping the appellant at the disposal of the Director, Elementary and Secondary Education, Peshawar, the appellant has been hanged in the air by the respondents hence in such situation, the appellant would be totally at total mercy of the Directorate office which is also not the mandate of law and justice.
- xv. That, the impugned office order issued by the respondents offends all norms of justice, fair play, equity, good conscious and such act of the respondents encroaches upon the fundamental rights of the appellant as guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
- xvi. That, the powers or jurisdiction are vested in an authority to exercise it justly, fairly, honestly, judiciously and in accordance with the mandate of law, rules and regulations but the respondents have transgressed upon their powers while dealing with the matter in hand.

- xvii. That, it is an inalienable right of the appellant to enjoy the protection of law and to be treated in accordance with law, rules and regulations but such rights of the appellant are being infringed by the respondents in a sheer malafide manner.

.....PRAYER.....

It is, therefore, most humbly prayed that on acceptance of the instant service appeal, impugned office order bearing Endst. No.4395-4405 dated 14.05.2024 issued by the respondent No.1 may please be set aside and the respondents especially respondents No.2 and 3 may please be strictly directed to implement the office order dated 02.08.2024 in its true letter and spirit or any other order or relief as this Honourable Tribunal deems fit and appropriate in the circumstances of the case, may also be issued/passed.

Dated 02.09.2024

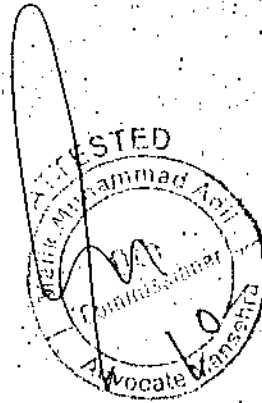
Through  Waqas Ahmed
... Appellant
SARDAR WAQAR-UL-MULK,
SARDAR WAJIH-UL-MULK, 
Advocates High Court,
Mansehra.

AFFIDAVIT.

I, Waqas Ahmed son of Aurangzeb resident of near Kohisar Flour Mills, Mohallah Upper Channai, Mansehra, Tehsil and District Mansehra presently Senior Clerk/ Stenographer, District Education Officer (Female), Mansehra, appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing Service Appeal are true and correct and nothing has been concealed from this Honourable Court.

Dated 02.09.2024


Waqas Ahmed
(DEPONENT)



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

C.M No. _____ of 2024
IN
Service Appeal No. _____ of 2024

Waqas Ahmed APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through
Secretary Education, Khyber Pakhtunkhwa,
Peshawar etc. RESPONDENTS

SERVICE APPEAL

**APPLICATION SEEKING SUSPENSION OF
THE OPERATION OF IMPUGNED ORDER
ISSUED BY THE RESPONDENTS AND FOR
ISSUANCE OF TEMPORARY INJUNCTION TO
THE EFFECT THAT THE RESPONDENTS
MAY PLEASE BE RESTRAINED FROM
FILLING UP THE AVAILABLE VACANT POST
OR DOING ANY OTHER ACT(S) WHICH
DIRECTLY OR INDIRECTLY EFFECTS THE
RIGHTS OF THE APPELLANT TILL THE
DISPOSAL OF THE TITLED SERVICE
APPEAL.**

Respectfully Sheweth!

1. That, this application may please be considered as part and parcel of the titled service appeal.


2. That, the appellant has a prima facie case and there is every hope of its success.
3. That, the balance of convenience also tilts in favour of the appellant.
4. That, if the operation of the impugned office order has not been suspended and the temporary injunction has not been issued then the appellant would suffer an irreparable loss and purpose of the titled appeal would become infructuous.


.....PRAYER.....

It is, therefore, most humbly requested that on acceptance of the instant application, operation of the impugned office order may please be suspended and temporary injunction as mentioned in the heading of the instant application may please be issued/passed till the disposal of the titled service appeal.

Dated 02.09.2024

Waqas Ahmed
.....Appellant

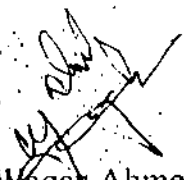
Through 

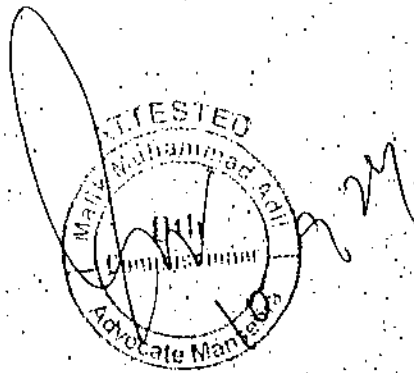
SARDAR WAQAR-UL-MULK,
SARDAR WAJIH-UL-MULK, 
Advocates High Court,
Mansehra.

AFFIDAVIT.

I, Waqas Ahmed son of Aurangzeb resident of near Kohisar Flour Mills, Mohallah Upper Channai, Mansehra, Tehsil and District Mansehra presently Senior Clerk/ Stenographer, District Education Officer (Female), Mansehra, appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing Service Appeal are true and correct and nothing has been concealed from this Honourable Court.

Dated 02.09.2024


Waqas Ahmed
(DEPONENT)



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

W.P. No. _____ of 2024

Waqas Ahmed **APPELLANT**

VERSUS

Government of Khyber Pakhtunkhwa through
Secretary Education, Khyber Pakhtunkhwa,
Peshawar etc..... **RESPONDENTS**

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Waqas Ahmed son of Aurangzeb resident of
near Kohisar Flour Mills, Mohallah Upper
Channai, Mansehra, Tehsil and District
Mansehra presently Senior Clerk/
Stenographer, District Education Officer
(Female), Mansehra.

RESPONDENTS

1. Government of Khyber Pakhtunkhwa through
Secretary Education, Khyber Pakhtunkhwa,
Peshawar.
2. Director, Elementary and Secondary
Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Mansehra.

Dated 02.09.2024

Waqas Ahmed
Appellant

Through

**SARDAR WAQAR-UL-MULK,
SARDAR WAJIH-UL-MULK,**
Advocates High Court,
Mansehra.

پاکستان کے لیے برقی شناختی کارڈ

101221594752



پاکستان کے لیے برقی شناختی کارڈ

11501 BRZ0315

Holder's Signature



Date of Issue 25.10.2022

Date of Expiry

Identity Number 13501-6828031-5

Country of Birth Pakistan

Gender M

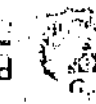
Country of Stay Pakistan

Patier Name Aurang Zeb

Waqas Ahmad

Name

PAKISTAN National Identity Card



Amexure "A"

P-21

NIC No 13501-6828031-5

The entries in this page should be corrected or re-allocated at least every five years and the signature in lines 9 and 10 should be dated.

Name Wazias Ahmad

Race Rajpoot / ~~xxxxxx~~

3. Residence Village and P.O Gianool Teh.
Balakot Dist. Manshera.

4. Father's name and residence:

Aurangzale.

5. Date of birth by Christian era as nearly as can be ascertained

(Eight April N.H Eighty eight)
8-4-1988.


6. Exact height by measurement

5-9


7. Personal marks for identification

Mole on Face (Right side)

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger. 

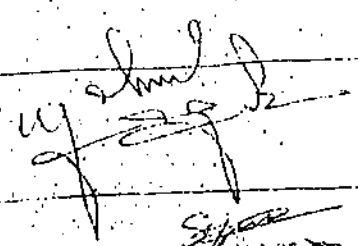
Ring Finger

Middle Finger. 

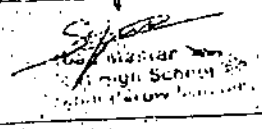
Fore Finger

Thumb. 

9. Signature of Government servant.



10. Signature and designation of the Head of the Office, or other Attesting Officer.


Head of the Office
High School
Balakot

1	2	3	4	5	6	7	
Name of post	Whether nature - type of officiating and whether temporary or permanent	Officialing state (i) authorized, (ii) whether appointment, or office counts under Act, 211 C. B. N.	Pay in equivalent post	Additional pay for officiating	Other entitlement under the act, 211	Rate of appointment	Signature of Government agent
J/c B.H.S. Banda Band	Per: Temp		2415/Rm			15000	15000
do - B.H.S. Banda	Per: Temp		2530/Rm			12000	12000
do - Per: Temp	Per: Temp		2530/Rm			15000	15000
do - B-7-2940-160-2740	do - J/c		2940- 3100/Rm			12000	12000
do - B-7-2940-160-2740	do - J/c		3200/Rm			12000	12000
do - B-7-3530-190-4230	do - B.H.S. Banda		3910/			12000	12000
do -	do -		4100			12000	12000
do -	do -		4290			12000	12000
do -	do -		4480/Rm			12000	12000
do -	do -		4480/Rm			12000	12000
D.D.O (M) Member J/c	Member J/c		7400/Rm			12000	12000
B-7-5800-320-15400							

1	2	3	4	5	6	7	8	9
Signature and designation of the head of the office or other officer in column 1 to 8	Date of termination (such as appointment, promotion, etc.)	Signature of the head of the office or other officer	Rate of leave on average	Allocation of period of leave	Signature of the head of the office or other officer	Signature of the head of the office or other officer	Signature of the head of the office or other officer	Signature of the head of the office or other officer
1	1	1	1	1	1	1	1	1
2	2	2	2	2	2	2	2	2
3	3	3	3	3	3	3	3	3
4	4	4	4	4	4	4	4	4
5	5	5	5	5	5	5	5	5
6	6	6	6	6	6	6	6	6
7	7	7	7	7	7	7	7	7
8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9

1. 12/15/2006 to 12/15/2007 on the school record
 2. 12/15/2007 to 12/15/2008 on the school record
 3. 12/15/2008 to 12/15/2009 on the school record
 4. 12/15/2009 to 12/15/2010 on the school record
 5. 12/15/2010 to 12/15/2011 on the school record
 6. 12/15/2011 to 12/15/2012 on the school record
 7. 12/15/2012 to 12/15/2013 on the school record
 8. 12/15/2013 to 12/15/2014 on the school record
 9. 12/15/2014 to 12/15/2015 on the school record

1st copy of the record
 24

BOARD OF INTERMEDIATE



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

Abbottabad N.W.F.P. - Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2004

This is to certify that WAQAS AHMAD
Son/Daughter of AURANG ZEB

A candidate from GOVT. HIGH SCHOOL GHANOOOL MANSEHRA
has passed the Secondary School Certificate Examination of the Board of
Intermediate and Secondary Education, Abbottabad held in March 2004 as a
Regular/Private Candidate. He/She obtained 462 marks out of 850 and has been
placed in Grade C Representing GOOD.

The candidate passed in the following subjects.

- | | | | |
|------------|------------|--------------|----------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS | 6. PHYSICS | 7. CHEMISTRY | 8. BIOLOGY |

Date of Birth according to admission form is EIGHTH APRIL

One Thousand Nine Hundred and EIGHTY-EIGHT (08-04-1988)

Assl. Secretary

This certificate is issued without alteration or emsuro

Secretary

(26)

NWFP BOARD OF TECHNICAL EDUCATION

PESHAWAR



DETAIL MARKS CERTIFICATE DIPLOMA IN BUSINESS ADMINISTRATION PART - II



Name of Candidate WAQAS AHMAD
 Father's Name AURANG ZEB
 Roll No 102111 Session SUPPLY 2006
 Institute/College GOVERNMENT COLLEGE OF COMMERCE MANSEHRA

Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
Part-I	700			351	
1 English	100	40		40	Forty
2 Urdu	100	50		50	Fifty
3 Pak Studies	50	28		28	Twenty-eight
4 Economics	100	55		55	Fifty-five
5 Computer Application to Business - II	100 / 50	54	42	96	Ninety-six
6 Financial Accounting - II	100	40		40	Forty
7 Sales Man Ship	100	30		30	Thirty (Pass by GM)

1460

690 Six hundred ninety

Checked by [Signature]
 Errors & Omissions excepted

[Signature]
 CONTROLLER OF EXAMINATIONS



MANSEHRA, PAKISTAN
DETAILED MARKS CERTIFICATE
BCOM SUPPLEMENTARY EXAMINATION 2010

Roll No: 55308

Reg No: 08-M-Com-250

Name: Waqas Ahmad

F/Name: Aurang Zeb

Institution: GOVT. COLLEGE OF COMMERCE
MANSEHRA

Part: Second

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks →	700				315	THREE HUNDRED FIFTEEN	
AUDITING	100		52		52	FIFTY-TWO	Pass
STATISTICS	100		40		40	FORTY	Pass
BUSINESS COMMUNICATION	100		40		40	FORTY	Pass
INCOME TAX LAW	100		52		52	FIFTY-TWO	Pass
ACCOUNTING INFORMATION SYSTEM	75	25	30	12	42	FORTY-TWO	Pass
FINANCIAL ACCOUNTING- II	100		47		47	FORTY-SEVEN	Pass
COST ACCOUNTING	100		65		65	SIXTY-FIVE	Pass
					653	SIX HUNDRED FIFTY-THREE	

Total: 1400
Percentage: 46.64
Division: SECOND

Print Date: 01-02-2011

Checked By: _____

Errors and omissions are subject to subsequent rectification.
Note: Any mistake in Name, Father Name etc must be intimated
within 60 days of the issuance date of this Certificate.

Controller Examinations
Hazara University, Manselira
February 01, 2011



HAZARA UNIVERSITY, MANSHERA, PAKISTAN
Govt College of Management Sciences Manshera
TRANSCRIPT
Master of Business Administration (Finance)
(Session 2011-2013)

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Name: **WAQAS AHMAD**
 Roll No: **S/11/M12**

Father's Name: **ALRANG ZEB**
 Registration No: **08-M.COM-250**

1st Semester Spring 2011

Course Title	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Principles of Management	100	71	3	3.1	9.3		
Business Communication	100	62	3	2.2	6.6		
Financial Accounting	100	56	3	1.6	4.5		
Principles of Marketing	100	72	3	5.2	9.6		
Business Mathematics & Statistics	100	70	3	3.0	9		
Computer Orientation and Packages	100	80	3	4.0	12		
Total	600	411	18		51.3	2.85	Promoted

2nd Semester Fall 2011

Course Title	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Economics (Micro and Macro)	100	80	3	4.0	12		
Management Information System	100	66	3	2.6	7.8		
Business Research Methods	100	71	3	3.1	9.3		
Cost & Management Accounting	100	78	3	3.8	11.4		
Marketing Management	100	80	3	4.0	12		
Banking & Finance	100	60	3	2.0	6.0		
Total	600	435	18		58.5	3.25	Promoted

3rd Semester Spring 2012

Course Title	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Financial Management	100	72	3	3.2	9.6		
Human Resource Management	100	71	3	3.1	9.3		
Production & Operation Mgt.	100	63	3	2.3	6.9		
Corporate Finance	100	71	3	3.1	9.3		
Financial Statement Analysis	100	72	3	3.2	9.6		
Total	500	349	15		44.7	2.98	Promoted

4th Semester Fall 2012

Course Title	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Organization Behaviour	100	69	3	2.9	8.7		
Project Management	100	60	3	2.0	6		
Strategic Management	100	67	3	2.7	8.1		
International Finance	100	77	3	3.7	11.1		
Entrepreneurship	100	80	3	4.0	12		
Internship	200	160	6	4.0	24		
Total	700	513	21		69.9	3.33	Passed

Note: Any error & omissions are subject to subsequent rectification

Result declared on: 11th November 2012
 CGPA: **3.11**
 PERCENTAGE: **71%**

TOTAL MARKS: 3400
 OBTAINED MARKS: 1708

Prepared by: Said Ramad Shariq

Controller of Exams
 GCMS, Manshera

Controller of Exams
 Hazara University, Manshera Pakistan

Principal
 GCMS, Manshera

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S. No	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
1.	Ajib Gul	Faiz Gul	Mohamud	DEO F. Mohamud	DEO F. Mohamud	A.V.P.
2.	Muhammad Khan Sher	Khan Sher	Peshawar	DEO M. Tahir II	SDEO M. Tahir II	A.V.P.
3.	Mumtaz Khan	Noor Akbar	Chaudhry	GHS Dusehra	GHS (Tambal) Mardun	A.V.P.
4.	Khair Ullah	Khair Ullah	Mardun	GHS Sanyan	GHS Sanyan Mardun	A.V.P.
5.	Dost Muhammad Khan	Sher Zaman Khan	Mardun	DEO F. Mardun	DEO F. Mardun	A.V.P.
6.	Muhammad Arif	Muhammad Arif	Manshera	GHS Kowal	DEO M. Torghar	A.V.P.
7.	Azif Anis	Amin Ul Haq	Peshawar	Directorate EASE KP	DEO (M) Peshawar	A.V.P.
8.	Uaq Nawaz	Muhammad Zaid	Abbottabad	GHS Ashraf Akbar	GHS Sherpur	A.V.P.
9.	Asmat Ullah Shah	Syed Noori Shah	Islamabad	GHS Ghazi Dand	GHS Nor Shahrul Khan	A.V.P.
10.	Salim Khan	Aqim Khan	Islamabad	GHS Kakti Baram	GHS Adami Sultan	A.V.P.
11.	Shah Saud	Jamshed Jan	Chowk	GHS Thundzil	GHS Haripur	A.V.P.
12.	Rehman Ullah	Gul Had Shah	Karak	GHS Chakera	GHS Haripur Karak	A.V.P.
13.	Muhammad Ghani	Gul Melbaob	Karak	SDEO F. Karak	SDEO (F) Karak	A.V.P.
14.	Shafiq ur Rehman	Tab Nawab	Karak	GCHS Karak	GHS Jabbar Karak	A.V.P.
15.	Adil Zubair	Muhammad Zubair	Manshera	GHS Trawar	GHS Behati	A.V.P.
16.	Kamran Khan	Ismatullah	Chowk	GHS Niswan	GHS Adige	A.V.P.

Consent upon the recommendation of the Provincial Promotions Committee (PPC) in the following manner: (i) to the extent of the posts advertised against vacant posts of Senior Clerk (III-14) in the cities in numbers as mentioned in the Annexure (I) to the Public Notice No. 10 of 2022, the following Assisted Short Lists (ASL) are hereby prepared by the Deptt. of Public Administration under the Department of Public Administration, Government of Punjab, Lahore. (ii) to the extent of the posts advertised against vacant posts of Senior Clerk (III-14) in the cities in numbers as mentioned in the Annexure (II) to the Public Notice No. 10 of 2022, the following Assisted Short Lists (ASL) are hereby prepared by the Deptt. of Public Administration under the Department of Public Administration, Government of Punjab, Lahore. (iii) to the extent of the posts advertised against vacant posts of Senior Clerk (III-14) in the cities in numbers as mentioned in the Annexure (III) to the Public Notice No. 10 of 2022, the following Assisted Short Lists (ASL) are hereby prepared by the Deptt. of Public Administration under the Department of Public Administration, Government of Punjab, Lahore. (iv) to the extent of the posts advertised against vacant posts of Senior Clerk (III-14) in the cities in numbers as mentioned in the Annexure (IV) to the Public Notice No. 10 of 2022, the following Assisted Short Lists (ASL) are hereby prepared by the Deptt. of Public Administration under the Department of Public Administration, Government of Punjab, Lahore. (v) to the extent of the posts advertised against vacant posts of Senior Clerk (III-14) in the cities in numbers as mentioned in the Annexure (V) to the Public Notice No. 10 of 2022, the following Assisted Short Lists (ASL) are hereby prepared by the Deptt. of Public Administration under the Department of Public Administration, Government of Punjab, Lahore.

NOTICE NO. 10 OF 2022

5/10/2022

TO BE SUBMITTED BEARING SAKH NO. & DATE
 DIRECTORATE OF P.M.S. & SUPERVISORY SERVICES
 GOVERNMENT OF PUNJAB, LAHORE



Annexure
 C.C.
 Prom. In order

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S. #	Sen: No	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
17.	143	Mohammad Hasharat	Mehboob Alam	Manshra	GHS Chinor Kot Manshra	GHS Kowal Manshra	A.V.P
18.	145	Muhammad Irshad	Muhammad Farid	Manshra	GHS Thakra Manshra	GHS Budkot Kohistan	A.V.P
19.	151	Gul Faqir	Mulib Ullah	Dir Upper	GHS Kalkot Dir Upper	GHS Namkot Dir Upper	A.V.P
20.	153	Jehangir	Jau Alam	Hangu	GHS Khujari Baber Bannu	Service placed at the disposal of DEO (M) Bannu for further adjustment against the vacant post of SA Clerk	A.V.P
21.	154	Shoukat Ali	Habat Khan	Kuram	DEO Kurram	GHS Dogar Kurram	A.V.P
22.	155	Inanullah	Daim Gul	North Waziristan	GHS Hasu Khel NW4	DEO M North Waziristan	A.V.P
23.	160	Sahib Zada	Muhammad Rahman	Dir Lower	GHS Jawza Dir Lower	GHS Atian Kally Dir Lower	A.V.P
24.	162	Muhammad Reza Shah	Miranshah	Di Khan	GHS Landi Baloch FR Di Khan	GHS Land Baloch Di Khan	A.V.P
25.	163	Syed Jadir Shah	Syed Muhammad Sibtan	Orakzai	GGHS Bada Khel Orakzai	DEO (F) Hangu	A.V.P
26.	164	Arbab Khan	Dir Nawab Khan	North Waziristan	GHS Miranshah North Waziristan	SDEO M Miranshah North Waziristan	A.V.P
27.	166	Falak Naz	Sher Nawaz	North Waziristan	DEO North Waziristan	GHS Saddri Kot N.W	A.V.P
28.	168	Khalid Muhammad	Perinana Khan	South Waziristan	GHS Muhammad Nawaz Kot South Waziristan	DEO F South Waziristan	A.V.P
29.	169	Sabir Hussain	Shakir Hussain	Kuram	GHS Ghuzghar Kuram	DEO (M) Hangu	A.V.P
30.	170	Aftab Alam	Mustaqeem Khan	South Waziristan	GHS Zadana South Waziristan	DEO M South Waziristan	A.V.P
31.	171	Shah Mohammad	Miradani Khan	North Waziristan	GHS Jan Muhammad North Waziristan	SDEO F Miranshah North Waziristan	A.V.P
32.	172	Asfand Yar	Sangtiaz Khan	SD Wazir Bannu	SDEO SD Wazir Bannu	GHS Narmi Khel Baka Khel Bannu	A.V.P
33.	173	Ikram Ullah	Zahid Ullah	SD Wazir Bannu	GHS Baka Khel Bannu	GGHS Bilawar Khan Bannu	A.V.P
34.	174	Imran Ali	Nazar Ali	Kuram	GGHS Burki Parachinar Kuram	DEO (M) Hangu	A.V.P
35.	175	Muhammad Hussain	Smswar Ali	Kuram	GHS Kara Khela Parachinar Kuram	DEO (M) Hangu	A.V.P
36.	176	Mir Afzal	Ali Marjan	North Waziristan	GHS LAND North Waziristan	GHS Gulshah Jan North Waziristan	A.V.P
37.	177	Inam Ullah	Abdul Hussain	North Waziristan	GHS MIRANSHAH VILL	DEO M North Waziristan	A.V.P
38.	178	Asar Inam	Pir Ghulam	FR Tank	SDEO (F) Jandola Tank	SDEO (M) Jandola Tank	A.V.P

S. #	Serial No	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
39.	180	Sher Ayaz	Amir Durrani	Bannu	G.H.S. Muzah Khel Bannu	G.H.S. Muzah Khel Bannu	A.V.P.
40.	184	Shams ur Rahman	Muhammad Ijazat	Katakand	G.H.S. Qadir Kati Mulkand	G.H.S. Ijazat Katakand	A.V.P.
41.	185	Muhammad Sajid Iqbal	Sheikh Muhammad Iqbal	DIK	G.H.S. No. 1 P. H. AR PUR DI Khan	G.H.S. Iqbal DI Khan	A.V.P.
42.	186	Jahangir Khan	Mastan Khan	Bannu	G.H.S. Abdul Ghaffar Muhammad Khan Bannu	G.H.S. Ajmal Badkash Bannu	A.V.P.
43.	188	Muhammad Anwar	Nadar Khan	DIK	G.H.S. Tariq DI Khan	G.H.S. Keri Khosro DI Khan	A.V.P.
44.	189	Muhammad Javed Khan	Shadi Khan	DIK	G.H.S. Kotla Ludhiana DI Khan	G.H.S. Dhakki DI Khan	A.V.P.
45.	192	Wali Ullah	Inayat Ullah Khan	Lakki	G.H.S. Tariq Khel Lakki	DEO M Lakki	A.V.P.
46.	193	Riaz Ahmad	Abdur Rahim	Karak	SDEO F T/Nusrati Karak	SDEO (M) Takha Nusrati Karak	A.V.P.
47.	194	Rehman Ali	Noor Wali Khan	Bannu	G.H.S. Sema Sikander Khel Bannu	G.H.S. Sema Sikander Khel Bannu	A.V.P.
48.	195	Raza Ullah Khan	Bahader Khan	Bannu	G.H.S. Dheri Saidan Bannu	G.H.S. Dheri Bannu	A.V.P.
49.	196	Muhammad Nadeem Nawaz	Allah Nawaz	DIK	GGHSS NO. 9. DIN PUR DI Khan	SDEO (M) DI Khan	A.V.P.
50.	199	Akhtar Ajab	Noor Ajab	Karak	G.H.S. Mitha Khel	GGHSS Togh Bala Karak	A.V.P.
51.	200	Abdul Nabi	Sher Abbas Khan	Karak	G.H.S. Garang Siraj Khel	SDEO (M) Lachi Kohat	A.V.P.
52.	201	Muhammad Ajmal	Zar Muhammad	Karak	SDEO (M) Karak	G.H.S. Chorlakat Kohat	A.V.P.
53.	203	Shahid Ullah	Azad Khan	Bannu	G.H.S. Hathak Shirzu Khan Sarani Bannu	GGHSS Ghori Wala Bannu	A.V.P.
54.	204	Muhammad Sajid	Umer Bad Shah	Karak	GGHSS Mianki Banda Karak	G.H.S. Lachi Kohat	A.V.P.
55.	206	Shoukat Ali	Gul Nawaz	Karak	G.H.S. Jehangir Karak	G.H.S. Nandaka Kohat	A.V.P.
56.	207	Ijaz ur Rehman	Zar Wali Khan	Karak	GGHSS Esak Chountra Karak	G.H.S. Maulari Kohat	A.V.P.
57.	208	Haider Ullah Khan	Aman Ullah Khan	Karak	SDEO F Karak	G.H.S. Kandi Khel Karak	A.V.P.
58.	209	Ahmad ullah	Mehmood Khan	Bannu	GGHSS Piran Khan Badshah Bannu	Service placed at the disposal of DEO (F) Bannu for further adjustment against the vacant post of S/C	A.V.P.
59.	210	Abdul Haleem	Abdul Ali	Peshawar	G.H.S. Kandi Zarin Khel HSD Peshawar	G.H.S. Zahir Abad Peshawar	A.V.P.
60.	213	Haider Shah	Zar Wali Khan	FR Tank	G.H.S. Jumbala Tank	GGHSS No. 1 Tank	A.V.P.

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S. #	Serial No.	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
61.	216	Muhammad Humayun	Atidullah Khan	Lakki	GHS Jhang Khel Lakki Mawad	DEO M Lakki	A.V.P
62.	218	Naseer Abusied	Rasheed Ahmad	DIR	GGHSS Pahar pur	GHSS Kotjoi DI Khan	A.V.P
63.	219	Sana Ullah Khan	Ashraf Ullah Khan	LAKKI	GHSS Ghuzni Miel Lakki mawad	SDEO (F) Ghuzni Khel Lakki	A.V.P
64.	220	Majid Khan	Niaz Muhammad	Peshawar	GHS Mian Morcha Khyber	GHSS Spin Dhand Khyber	A.V.P
65.	221	Hazrat Jamal	Mehboob Ali	FR Peshawar	GHS Janakor FR Peshawar	GHSS Gorhi Ghulam Shah Peshawar	A.V.P
66.	222	Gul Zardad	Rahim Dad	LAKKI	GGHSS No. 1 Said Khel Lakki	GGHSS Kot Kashmir Lakki	A.V.P
67.	223	Nafis Ullah	Abdul Majeed	LAKKI	GGHS Sohar Khel Abba Khel Lakki	SDEO (M) Sohar Nowrang Lakki	A.V.P
68.	225	Mushtaq Khan	Khawaza Mir Khan	LAKKI	GHS DHARAKA AZIZ KHAN Lakki	GHSS Dharraki Aziz Khel Lakki	A.V.P
69.	226	Gul Raig Zeb	Gul Said	Swabi	GGHSS Koha Swabi	GGHSS Koha Swabi	A.V.P
70.	227	Liaqat Khan	Husan Ullah	Mardan	GGHSS Gujar Garhi Mardan	DEO M Mardan	A.V.P
71.	228	Noor Ul Hayat	Hizar Hayat	Swabi	GGHSS Jahangiri Swabi	DEO F Swabi	A.V.P
72.	229	Siraj Hussain	Israr Hussain	Kurram	GGHS Paruchinar K. Agency	DEO F Kurram	A.V.P
73.	230	Qamar Shaid	Zar Shaid	Swabi	GGHS Manki Swabi	GHSS Tor Dher Swabi	A.V.P
74.	231	Wahid Ullah	Abdul Malik	Swabi	GHSS Patj Pir Swabi	SDEO M Lahor Swabi	A.V.P
75.	233	Farooq Alifad	Amir Hatan	Swabi	GGHS Malik Abad Swabi	GHSS Ulla Swabi	A.V.P
76.	234	Ijaz Ahmad	Fazli Azeem	Swabi	GHSS Taluka KOI Swabi	GHSS Tand Kohi Swabi	A.V.P
77.	235	Amir Incha	Amir zada	Swabi	DEO M Swabi	DEO M Swabi	A.V.P
78.	236	Abdul Ghani Bacha	Lal Bacha	Swabi	GHS Tana Swabi	DEO M Swabi	A.V.P
79.	237	Umar Zaman	Wahed Zaman	Swabi	GGHS Jhonda Swabi	GHSS Pabni Swabi	A.V.P
80.	239	Abid ur Rehman	Ghazi Marjon	Karak	GGHS Ahmad Abud Karak	GHSS Dhami Saghe Kohat	A.V.P
81.	240	Haroon Dad Shah	Behroin Khan	LAKKI	GGHS Murmudi Azim Lakki	DEO M Lakki	A.V.P
82.	241	Syed. Badshah	Wahid Shah	Peshawar	GHSS No. 2 Peshawar City	Directorate ERSE Peshawar	A.V.P
83.	243	Taufeq Akbar	Abdul Akbar	Charsadda	RPDC F Charsadda	GGHSS Ghalla Dher Mardan	A.V.P

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S. #	Sen: No	Name	Father's Name	Homele	Present place of posting	Proposed Station	Remarks
84.	243	Akshid Qayyum	Adalat Khan	TANKI	GGHS Chahar Bed Tallo	GGHS Akshid Bed Tallo	A.V.P
85.	244	Masroor Khan	Shah Nawaz Khan	Tank	GGHS Fawzan Kark	GGHS Fawzan Dera Kohat	A.V.P
86.	245	Rafiqullah	Nawab Ali	TANKI	GGHS Bahadur Tank	SDEO Mirpur	A.V.P
87.	246	Muhammad Irshad Ullah	Amir Hamza	TANK	GGHS Tank DI Khan	GGHS No. 2 DI Khan	A.V.P
88.	247	Muhammad Saeed	Khandi Hakkhash	TANK	GGHS Chaudhwan DI Khan	SDEO M Prova DI Khan	A.V.P
89.	248	Abdul Basit Khan	Dost Muhammad	TANKI	GGHS Towher Swabi	GGHS Jahangiri Swabi	A.V.P
90.	251	Rahmat Ullah	Ghulam Sadiq	TANK	GGHS Mulla DI Khan	SDEO (F) Prova DI Khan	A.V.P
91.	252	Hayat Ali Shah	Khaista Muhammad	Shangla	GGHS Saibul Puran Shangla	GGHS Shah Pind Swat	A.V.P
92.	253	Saif Ur Rahman	Muhammad Ramzan	Tank	GGHS Chudhara Tank	DEO M Tank	A.V.P
93.	254	Kifayat Hussain	Sahuan Ali	Kusman	GGHS College Colony Kurram	GGHS No. 3 Peshawar Cantt	A.V.P
94.	256	Amir Nawab Khan	Alunad Jan	Tank	GGHS Mulla Zai Tank	GGHS Mulla Zai Tank	A.V.P
95.	257	Abdul Qayum	Hamid Khan	Tank	GHS Pai Tank	DEO M Tank	A.V.P
96.	259	Akhtar Zaman	Muhammad Jan	Tank	DEO (F) Tank	DEO F Tank	A.V.P
97.	262	Said Akbar	Said Ahmad	Haripur	GGHS Talokar Haripur	GGHS Bahdi Muneem Haripur	A.V.P
98.	263	Safeer Ahmed	Shahzada Khan	Haripur	GHS Dhundla Haripur	GGHS Kot Najib Ullah Haripur	A.V.P
99.	265	Qaisar Sohail	Malik Aurangzeb	Haripur	GGHS Dobandi Haripur	GGHS Pindi Hasham Khan Haripur	A.V.P
100.	266	Shamroz Khan	Hayat Khan	Haripur	GHS Gali Kundi Haripur	GGHS Naru Anazai Haripur	A.V.P
101.	267	Imran Shah	Farman Shah	Haripur	SDEO M Ghazi Haripur	DEO (F) Haripur	A.V.P
102.	268	R. Nazir Abbas	R. Abdul Aziz	Haripur	GHS Gordon Taun Haripur	GGHS Khanpur Haripur	A.V.P
103.	269	Muhammad Puzal	Sakhi Muhammad	Haripur	GGHS Nalla Soha Haripur	GGHS Nalla Soha Haripur	A.V.P
104.	270	Anwar Zeb	Qalandar Khan	Haripur	GGHS Sarrai Naimat Khan Haripur	GGHS Sarrai Naimat Khet Haripur	A.V.P
105.	271	Sajid Rehman Khin	Sher Aman Khan	Haripur	GGHS Noordi Haripur	GGHS Mohri Bed Behu Abbottabad	A.V.P

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S. #	Serial	Name	Father's Name	Birth Date	Present place of posting	Proposed Station	Remarks
100	272	Riaz Nawaz	Riaz Khan	1950	Rawalpindi	Rawalpindi	
101	273	Faraz Ahmad	Faraz Ahmad	1950	Rawalpindi	Rawalpindi	
102	274	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
103	275	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
104	276	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
105	277	Muhammad Azeem	Muhammad Azeem	1950	Rawalpindi	Rawalpindi	
106	278	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
107	279	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
108	280	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
109	281	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
110	282	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
111	283	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
112	284	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
113	285	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
114	286	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
115	287	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
116	288	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
117	289	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
118	290	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
119	291	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
120	292	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
121	293	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
122	294	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	
123	295	Abdul Wahid	Abdul Wahid	1950	Rawalpindi	Rawalpindi	
124	296	Muhammad Tariq	Muhammad Tariq	1950	Rawalpindi	Rawalpindi	

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S. #	Serial No	Name	Father's Name	District	Present place of posting	Proposed Station	Remarks
127	299	Qadir Ullah	Muhammad Aslam Khan	Bannu	GHSS Painsa Khel Wazir Bannu	GHSS Painsa Khel Bannu	A.V.P.
128	300	Nek Bahader	Khan Bahader	Bannu	GHSS No. 3 Bannu City	GHSS No. 3 Bannu City	A.V.P.
129	301	Ihsan Ullah	Noor Abdulqadir	Dir Lower	GHSS Ihsanwara Dir Lower	GHSS Man Killa Mahala Dir Lower	A.V.P.
130	302	Nasir Uddin	Ihsan Ullah	Dir Lower	SDEO M Samarbagh Dir Lower	SDEO M Samarbagh Dir Lower	A.V.P.
131	305	Niaz Ali	Paima Gul	Mardan	GHSS Katti Garhi Mardan	GHSS Katti Garhi Mardan	A.V.P.
132	307	Hameed Khan	Gul Haider Khan	Bannu	GHSS Khach Muhammad Khel Bannu	GHSS Khach Muhammad Khel Bannu	A.V.P.
133	308	Muhammad Sheeb	Din Muhammad	Tank	DEO M Tank	DEO M Tank	A.V.P.
134	311	Mati Ullah	Hanif Ullah	Dir Lower	GHSS Shah Kandi Dir Lower	GHSS Saddo Dir Lower	A.V.P.
135	312	Muhammad Fayaz	Muhammad Ilyas	Chitral	DEO F Chitral Upper	DEO (F) Upper Chitral	A.V.P.
136	313	Iqbal Ullah	Muslim Khan	Chitral	GHSS Bazar Drosh Chitral Lower	SDEO (F) Drosh	A.V.P.
137	314	Muhammad Jahanzeb	Rahmat Wazir Khan	Chitral	GHSS Barun owir Upper Chitral	GHSS Barun owir Upper Chitral	A.V.P.
138	315	Ziaullah	Zafarullah	Chitral	SDEO F Bori Upper Chitral	GHSS Warjuni Upper Chitral	A.V.P.
139	317	Abid Kamal	Abdul Rashid	Chitral	DEO F Chitral Lower	DEO (F) Lower Chitral	A.V.P.
140	318	Naqib Ahmad	Muhammad Shah	Charsadda	GHSS Zahid Abad	GHSS Tarnab Peshawar	A.V.P.
141	319	Muhammad Umar	Qayyum Nawaz	DIK	GHSS No. 7 DIK	GHSS Behari Colony DI Khan	A.V.P.
142	320	Ali Rehman	Aziz Ur Rehman	Balochistan	GHSS Sh. Payee	DEO (M) Tophar	A.V.P.
143	321	Jehan Zeb	Muhammad Akbar	BUNER	GHSS Batai Bunir	GHSS Bokada Bunir	A.V.P.
144	322	Bakht Jehan	Shahwar Khan	BUNER	GHSS Bampokha Bunir	GHSS Torwarsha Bunir	A.V.P.
145	323	Abdul Ghafar	Abdul Qadir	BUNER	SDEO F Bunir Doggar	SDEO (F) Doggar Bunir	A.V.P.
146	324	Iqbalullah	Mohib Ullah	BUNER	GHSS Dewana Baba Bunir	DEO (M) Bunir	A.V.P.
147	325	Gohar Ali	Amir Rahim	BUNER	GHSS Topai Bunir	GHSS Topai kadal Bunir	A.V.P.

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S. #	Serial No	Name	Father's Name	Homelet	Present place of posting	Proposed Station	Remarks
148	326	Abdul Zeb	Sultan Zeb	BUNER	GHS Cheema Buner	GHS Yousaf Kalla Buner	A.V.P
149	327	Abdulkamir Nisar	Sher Nawaz Khan	BUNER	GGHS Nagrai Buner	GGHS Nagrai Buner	A.V.P
150	328	Amir Alam Khan	Nasir Khan	BUNER	GHS Bahara Buner	GGHS Chama Buner	A.V.P
151	331	Zahid Ullah	Hakim Shah	BUNER	GHS Shalbatoli Buner	SDEO (F) Daggan Buner	A.V.P
152	332	Khurshid Khan	Shah Baz Khan	BUNER	GHS Maawani Buner	GHS Amawar Buner	A.V.P
153	333	Abdul Watid	Abdul Qadir	BUNER	GHS Kati Kala Buner	GHS Jangl Buner	A.V.P
154	334	Shahid Ali	Shahid Hussain	BUNER	GHS Morada Buner	GHS Nawagai Buner	A.V.P
155	335	Mian Ghafoor Shah	Righdwan Shah	BUNER	GHS Kalyari Buner	DEO (F) Buner	A.V.P
156	336	Najmat Ullah	Gulistan Khan	DIK	GGHS Belot Sharif DIK	GGHS Belot Sharif DI Khan	A.V.P
157	337	Razi Ullah	Sher Mast	LAKKI	GHS Dara Pezu Lakki Marwa	GHS Ibrahim Zai Hangu	A.V.P
158	338	Abdul Hameed	Shah Alam Khan	LAKKI	GHS Dabak Mandra Khel Laki	GHS Togh Sarai Hangu	A.V.P
159	339	Mustafa Kamal	Khan Sardar	LAKKI	GHS Zafar Mand Khel Laki	GHS Muhammad Khwag Hangu	A.V.P
160	340	M. Ibrahim	Kabel Khan	LAKKI	GHS Abdul Khel Laki	DEO M Hangu	A.V.P
161	341	Abdullah Khan	Faiz Ullah Khan	LAKKI	GGHS Bachkan Adamzat	SDEO Sarai Nourang Lakki	A.V.P
162	342	Mir Aslam Khan	Sher Abbas Khan	LAKKI	GGHS Tilar Khel Lakki	GGHS Titar Khel Lakki	A.V.P
163	343	Humayun Khan	Ghulam Hussain	LAKKI	SDEO M Laki	DEO (M) Lakki	A.V.P
164	346	Gulab Hussain	Israr Hussain	Kurram	DPD Peshawar	DEO M Kurram	A.V.P
165	347	Taj Muhammad	Ghulam Habib	Dir Lower	GGHS Chokhara Dir Lower	GGHS Chokhara Dir Lower	A.V.P
166	349	Abdul Wahab	Qayyum Khan	DIKhan	GGHS Abdul khel DIK	GHS Chawchran DI Khan	A.V.P
167	350	Said Zarin	Shah Zarin	Dir Lower	GHS Sarai Bala Dir Lower	GGHS Ouch Dir Lower	A.V.P
168	351	Amir Said	Ghani Rahman	Dir Lower	SDEO F Adenzai Dir Lower	Service placed at the disposal of DEO (M) Dir lower for further adjustment against the vacant post of S. Clerk	A.V.P

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S. #	Serial No	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
169	352	Muhammad Ayaz	Muhammad Qasim	Dir Lower	GGHS Taryda Chamt Dir Lower	GGHS Chokharra Dir Lower	A.V.P
170	353	Inam Ullah	Momin Khan	Dir Lower	GGHS Pato Darsi Dir Lower	GGHS Pindoi Dir Lower	A.V.P
171	354	Hayat Muhammad Khan	Faiz Muhammad Khan	Dir Lower	GGHS Kanibar Maidan Dir Lower	GGHS Kottigrom Dir Lower	A.V.P
172	355	Qudrat Ullah	Zafar Khan	Tank	DEO(Male) Tank	DEO M Tank	A.V.P
173	356	Ulfat Iqbal	Ajab Khan	Tank	SDEO M Tank	SDEO M Tank	A.V.P
174	358	Noor Islam	Muhammad Sultan	Dir Lower	GHS Spina Khawra	GGHS Khair Abad Dir Lower	A.V.P
175	359	Nazir Ahmad	Quswat Khan	Mardan	GGHS Khazana Dheri Mardan	Service placed at the disposal of DEO (F) Mardan for further adjustment against the vacant post of S/Clerk	A.V.P
176	360	Shah Khalid	Bakht Biland Khan	Dir Lower	GHS Adam Dher Dir Lower	GGHS Shewa Dir Lower	A.V.P
177	361	Haji Akbar	Hazir Khan	Mardan	GGHS Chor Guli Mardan	GGHS Hussy Mardan	A.V.P
178	362	Saif Ullah	Gul Rehman	DIK	GGHS No 3 DIK	GGHS Katti Garh DI Khan	A.V.P
179	363	Muhammad Bilal	Muhamad Hassan	DIK	GHS MALANA DIK	GGHS Kiri Shomozul DI Khan	A.V.P
180	364	Sana Ur Rahman	Khalilur Rahman	Chitral	SDEO M Chitral Lower	SDEO (M) Chitral Lower	A.V.P
181	365	Zafar Ahmad	Sirajud Din	Chitral	GHS Morai Lower Chitral	DEO (F) Lower Chitral	A.V.P
182	366	Muhammad Salim Khan	SAIFUR REHMAN	Malakand	GGHS Inzegori Malakand	GGHS No. 1 Mingowar Swat	A.V.P
183	368	Zia Ullah	Sana Ullah	DIK	GHS DARABAN KHURD DIK	SDEO (M) Darband Khurd DI Khan	A.V.P
184	370	Azmat Ali	Muhammad Feeyaz	DIK	GHS WANDA MOUZAM DIK	GGHS Kich DI Khan	A.V.P
185	371	Hazrat Bilal	Abdul Aziz	DIK	GGHS Wana Mintzani DIK	GGHS Wera Muz DI Khan	A.V.P
186	373	Fazal Rahim	Arbab Khan	Orakzai	GHS Chapper Mishti Orakzai	SDEO (F) Hongu	A.V.P
187	374	Asad Mehmood	Azhar Mehmood	Haripur	GGHS Mang Haripur	GGHS Dingi Haripur	A.V.P
188	376	Qazi Hussain Ahmad	Qazi Sardar Hussain	Haripur	GGHS No 2 Haripur	DEO F Haripur	A.V.P

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S. #	Serial No	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
189	377	Akhtar Hussain	Melitab	Haripur	GHS Alodi Haripur	GHSS Deraoilhan Swat Abbottabad	A.V.P
190	378	Masood Khan	Daud Khan	Haripur	GGHS No. 2 KIS Haripur	GHSS Deo Haripur	A.V.P
191	379	Qazi Naem ur Rehman	Qazi Saqad ur Rehman	Haripur	GGHS Kalband Haripur	GHSS Rodla Abbottabad	A.V.P
192	380	Rashid Mahmood	Mohammad Sadiq	Haripur	GHS Bandi Sceran Haripur	GGHS Kokul Abbottabad	A.V.P
193	381	Imtihan Ul Haq	Ahmed Mukhtar	Haripur	GHS Gudwahion Haripur	GGHS Zorabi Swabi	A.V.P
194	382	Nisar Ahmad Qureshi	Muataz Ahmad Qureshi	Haripur	GGHS KIS # No.1 Haripur	DEO (M) Swabi	A.V.P
195	383	Shahbir Ahmad	Muhammad Younis	Haripur	GGHS Alodi Haripur	GGHS Alodi Haripur	A.V.P
196	384	Waqar Ahmed	Allah Bakhsh	Haripur	GGSM Kot Najebullah Haripur	GHSS Dagnatur Abbottabad	A.V.P
197	385	Abdul Malik	Abdul Wahid	Haripur	GGHS Ghazi Haripur	DEO M Swabi	A.V.P
198	386	Imran Khan	Ghulam Murtaza	Haripur	GHS Hoffs Haripur	GCMHS Marghaz Swabi	A.V.P
199	387	Sohail Ahmed	Muhammad Farooq	Haripur	GHS Karwala Haripur	SDEO M Abbottabad	A.V.P
200	388	Tanzeer Ahmed	Rafiq Ahmad	IS/K	SDEO F Kulachi Dikhan	SDEO (F) Kulachi DI Khan	A.V.P
201	389	Ali Muhammad	Malang Khan	Battagram	DEO F Battagram	DEO (M) Battagram	A.V.P
202	393	Kifayat Ali Shah	Ghulam Sardar Shah	Kohat	GHS No. 3 Kohat	GHSS No. 4 Kohat	A.V.P
203	394	Muhammad Aalngir	M/Iqbal Khan	Bannu	GHSS Nasib Nawaz Issaki Bannu	GHSS NO.1 Bannu city	A.V.P
204	395	Jehangir Khan	Awal Khan	Swat	GHS Guloch Swat	GGHS Kala Killy Swat	A.V.P
205	397	Asif Ullah Khan	Abdul Jalil Khan	Bannu	GHS Syed Tughul Khel Bannu	GHSS Ahamid Noor wali Noor Bannu	A.V.P
206	399	Shahid Ali	Gaiya Khan	Kohistan	GHS Kafar Banda Kohistan	DEO (F) Kohistan upper	A.V.P
207	400	Qaiser Jalil	Mulid Jalil	Bannu	GGSMS Bannu	GHSS Dilus Khan Mandew Bannu	A.V.P
208	401	Zarif Khan	Sahib Jan	Bannu	GGHS Slema Sikander Khel Bannu	GHSS Lalozai Bannu	A.V.P
209	402	Manzoor Ahmad	Noor Ali	Bannu	GHSS Sinkdandar Khel Bannu	GHSS Sikander Khel Bala Bannu	A.V.P

S. #	Serial No	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
210	401	Ali Rehman	Wasayat Khan	Malakand	GZS High School Dargai malakand	GISS Kot Malakand	A.V.P
211	405	Amir Ullah	Majeed Ullah	Karak	GISS Gumbat Kohat	GISS Gupuri Karak	A.V.P
212	406	Bakhtair Khan	Ramdad	Battagram	GISS Khatkhong	DEO (F) Torghar	A.V.P
213	409	Mohammad Yash Ali Shah	Mohammad J Anwar Shah	Mardan	GISS Gajar Garhi Mardan	GISS Chamtar Mardan	A.V.P
214	413	Sajjad Hussain	Abdur Raziq	Mardan	GISS Gajrat Mardan	GISS Bakhsbah Mardan	A.V.P
215	414	Wajeeh Uddin	Said Azim	Dur Uswa	GISS Baday Dur Uswa	GISS Lajpook Dur Uswa	A.V.P
216	415	Jehangeer Shah	Khalid Bad Shah	Diyala	DEO Khyber Agency	DFO F Khyber	A.V.P
217	416	Noor Habib Shah	Mohammad Durr Shah	Diyala	GISS Sur Kamar Khyber	GISS Ghafour Khan Khyber	A.V.P
218	417	Abi Rahim	Abdur Rahim	Swabi	DEO (F) Swabi	SDFO F Swabi	A.V.P
219	418	Ali Raza	Javid Sarkar	Peshawar	GISS Manakrao Peshawar	RPDC (AD) Gulbahar Peshawar	A.V.P
220	419	Tahir Haysan	Ehsaia Rehman	Mohmand	GGISS Shaqun talay molusmand	GISS Garhi sher dal Peshawar	A.V.P
221	420	Fakhr-uz-Zaman	Saifur Rehman	Battagram	GISS Tulana Afal Battagram	DEO (AD) Battagram	A.V.P
222	421	Amamullah	Hijada Khan	Battagram	GISS Battanwari	DEO (F) Torghar	A.V.P
223	422	Shoukat Ali	Muhammad Khan	Battagram	GISS Biland kol Battagram	DEO F Torghar	A.V.P
224	424	Khurshed Ahmad	Ashfaq Ahmad	Kohistan	DEO (AD) Kalal Palay Kohistan	DEO (AD) Kalal Palay Kohistan	A.V.P
225	425	Khurshed Ali	Afreen Khan	Battagram	GISS Hill	DEO (AD) Torghar	A.V.P
226	428	Zahoor Ahmad	Adil Khan	Battagram	GISS No.1 Battagram	GISS (Lower) Shantia	A.V.P
227	429	Amamullah	Hazrat Yousaf	Battagram	GISS No.1	DEO (F) Torghar	A.V.P
228	430	Gohar Ali Shah	Sahib Shah	Battagram	GISS No.1	GISS Chak	A.V.P
229	431	Laimsof Khan	Khurshed	Battagram	GISS No.1	GISS Torghar Kol	A.V.P
230	432	Amir Ullah	Aziz	Battagram	GISS No.1	GISS No.1	A.V.P

S. #	Serial No.	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
231	433	Yousaf Shah	Swali Jan	Khyber	GHS Badshah Abu Kili	DEO M Khyber	A.V.P
232	434	Raza Ullah Khan	Khoshal Khan	Bannu	GHS Wali Jan Bannu	Service placed on the disposal of D.O. (M) Bannu for further adjustment against the vacant post of S-Check	A.V.P
233	435	Saidullah Khan	Mubhammad Riaz Khan	Bannu	GHS Khudabakh Sheraz Khan Bannu	GHS Anwarul Uloom Khan Bannu	A.V.P
234	436	Iqbal Khan	Bakhtawar Khan	Bajaur	GHS Malkana Nowogai	GHS Samar Bagh Dir Lower	A.V.P
235	438	Jan Badshah	Masood Jan	Bajaur	GHS Bandogai Bajaur	SDEO (F) Samar Bagh Dir Lower	A.V.P
236	439	Hassan Gul	Gul Shahzada	Bannu	DEO Bannu	SDEO (M) Samar Bagh Dir Lower	A.V.P
237	440	Ghulam Haider	Ghulam Sarwar	Khyber	GHS Baghayan Bajaur	GHS Gulmi Peshawar	A.V.P
238	441	Iqbal Khan	Qamer Zaman	Bannu	GHS Shamshi Khel Bannu	GHS Nurur Bannu	A.V.P
239	442	Ata ur Rehman	Abdul Mateen	Bannu	SDEO (M) Battagram	DEO (F) Battagram	A.V.P
240	443	Hilzan Ullah Khan	Hameed Ullah Khan	Dir Upper	GHS Sulhan Khel	GHS Berari Dir Upper	A.V.P
241	444	Rosh Ullah	Abdul Wahab	Swabi	GHS Dugal Swabi	GHS Ayub Khan Kallit Swabi	A.V.P
242	446	Bakhtiar Ahmad	Ghulam Sarwar	Swabi	GHS Manert Poyan Swabi	GHS Jalil Swabi	A.V.P
243	447	Muhammad Allah	S.M Hasnain	Mardan	GHS Toru Mardan	GHS Dastur Tocu Mardan	A.V.P
244	448	Muhammad Arif	Khushal Khan	Kohistan	GHS Dasso Kohistan	DEO (M) Kohistan Upper	A.V.P
245	449	Muhammad Zair Khan	Said Ahmad Khan	Bannu	GHS Pashai	GHS Rehmanpur Samar Bagh Dir Lower	A.V.P
246	450	Muhammad Mushtaq	Sulaiman	Mardan	GHS Bogo Mardan	GHS Khat Bannu Mardan	A.V.P
247	451	Javid Iqbal	Waliullah	Mardan	GHS Ghalan Mardan	GHS Ghalan Mardan	A.V.P
248	453	Muhammad Zada	Gul Muhammad	Bannu	DEO Bannu	DEO Bannu	A.V.P
249	454	Roidar Ali	Ali	Mardan	DEO Mardan	DEO Dastur Tocu Mardan	A.V.P
250	455	Muhammad Gulab	Imdad	Bannu	GHS Dastur Bannu	DEO (F) Kohistan	A.V.P

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S. #	Serial No	Name	Father's Name	Domicile	Present place of posting	Proposed Station	Remarks
251	459	Shah Khalid	Anwar Shah	Shangla	GHS SHAHPUR	DEO (M) Shangla	A.V.P
252	460	Syed Mubabab Shah	Muhammad Saqi	Shangla	DEO (F) Shangla	SI (D) Alpuu Shangla	A.V.P
253	461	Nasirullah	Dilbar Khan	Shangla	GGHS Alpuu	DEO (M) Shangla	A.V.P
254	462	Azhar Iqbal	Mohd Sardar Rashtid	Shangla	DEO (M) Shangla	DEO (M) Shangla	A.V.P
255	463	Bashir Ahmad	Umar Zahir	Shangla	GHS Opal	DEO (F) Shangla	A.V.P
256	464	Alan Khan	Pacha Khista	District Upper	GHS Kohog Dir Upper	GHS Kohog Dir Upper	A.V.P
257	465	Wajahat Ali	Azmat Ullah	Shangla	GGHS Shokpur	GGHS Chawga Shangla	A.V.P
258	466	Zaka Ullah Khan	Muzammar Khan	LAKKI	GHS Landiwah	GHS Korboghla Hangu	A.V.P
259	467	Tauveer Shah	Amir Ajab Shah	Tank	GHS No 2 Tank	DEO (M) Tank	A.V.P
260	468	Ajmal Ullah Shah	Muhammad Farooq	LAKKI	GHS MANGALA	GHS Dallar Hangu	A.V.P
261	469	Muhammad Ilyas	Majnoon Ali	Nowshera	GHS Dak Small Khel	GGHS Dagg (Small Khel) Nowshera	A.V.P
262	470	Babar Naseem	Azamat	Kohistan	O/O SDO (F) Kohistan	SDO (F) Dasu Kohistan	A.V.P
263	471	Javed Iqbal Khan	Ahik Khan	Bannu	GHS Miryan Bannu	DEO (M) Bannu	A.V.P
264	473	Safirullah Khan	Muhammad Aslam Khan	Bannu	GGHS Kotka Junna Khan Bannu	GHS Kotka Bannu	A.V.P
265	474	Munirullah Khan	Sitams ul Islam	Bannu	GGHS Painsa Khel Wazir Bannu	GGHS Kotka Bilawar Khan Bannu	A.V.P
266	475	Rifat Ullah	Sher Afzal Khan	Bannu	GGHS Ayub Lalozai Bannu	GHS Lalozai Bannu	A.V.P
267	476	Farid Ullah	Ghazi Rehman	Bannu	GHS Kinger Jan Bannu	SDO (F) Bannu	A.V.P
268	477	Nasir Ullah	Hamid Ullah	Bannu	GGHS Raizid Bannu	RP (K) (M) Ghori Wala Bannu	A.V.P
269	478	Hussain Khan	Dil Nawaz	Bannu	GHS Dihaner Mughal Khel Bannu	GGHS Najaf Bannu	A.V.P
270	479	Sadullah Khan	Dil Anwar Khan	Bannu	GHS Amadi Umar Khel Bannu	GHS Ismail Khel Bannu	A.V.P
271	480	Muhammad Firdouse	Asmat Ali	Bannu	GGHS No 4 Bannu City	GGHS No. 2 Bannu	A.V.P

(Signature)

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S. #	Serial No	Name	Father's Name	Homelet	Present place of posting	Proposed Station	Remarks
272	481	Slah Melaood Khan	Inayat U Rehman	Hama	GHSS Nawa Hama	SDO (M) Damaul Hama	A.V.P.
273	482	Abid Ullah Khan	Abdul Ghafoor Khan	Hama	SDO (F) Mian Hama	Service placed at the disposal of D.O. Hama for further adjustment against the vacant post of S.C.A.	A.V.P.
274	483	Safirullah Khan	Ehsan Ullah Khan	Hama	GHSS Marozan Hama	GHSS Koti Sakka Hama	A.V.P.
275	484	Wasim Ullah	Sharif Ullah Khan	Hama	GHSS Muroob Mandan Hama	GHSS Bangash Mand Hama	A.V.P.

Notes:-

- Charge report should be submitted to all concerned.
- The DFO concerned is directed to adjust the newly promoted Senior Clerk at their original post, otherwise intimate this Directorate in case of non-availability of the post of Senior Clerk BS-14 for further adjustment.

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

Encls: No. 5352-5432 /A-23/MS/Proposal JC to SC/2022. Dated Peshawar the 01-11-2022

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

- Account General, Khyber Pakhtunkhwa Peshawar
- Director Curriculum & Teaching Education, Khyber Pakhtunkhwa, Abbottabad
- Director DPD Khyber Pakhtunkhwa, Peshawar
- Additional Director of Education NMD Peshawar
- District Education Officers (Male & Female) including NMDs concerned
- District Account Officers concerned
- Principals/Headmasters/Headmistresses concerned
- Sub-Division Education Officers (Male & Female) concerned
- Assistant Director (Exam) at DPD Peshawar
- Officials concerned
- PA to Director E&SE Khyber Pakhtunkhwa
- Master File


 Hafiz Muhammad Ibrahim
 Director (Admin)
 Khyber Pakhtunkhwa Peshawar

بخدمت جناب ڈائریکٹر ایلمنٹری اینڈ سکینڈری ایجوکیشن خیبر پختونخواہ پشاور

Adjustment against the post of Stenographer (B-14)

DEO (Male) & DEO (Female) Mansehra

عنوان :-

بوساطت :-

جناب عالی :-

گزارش ہے کہ سائل گورنمنٹ ہائر سکینڈری سکول کاغان میں بلور (B-14) S/C میں اپنے فرائض سرانجام دے رہا ہے۔ سائل مانسہرہ کارہاشی ہے اور سائل کا سکول سے گھر کا ایک طرفہ فاصلہ 125 کاویٹر ہوتا ہے جو کہ سائل کے لئے بہت دور ہے۔ سائل کے لئے اس بڑھتی ہوئی مہنگائی میں سکول آنے جانے کے اخراجات برداشت کرنا بہت مشکل ہے۔ سائل کے گھر کے قریب ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) ضلع مانسہرہ میں شیڈ گرافر (B-14) کی خالی پوسٹ ہے۔ جو کہ سائل کو بہت قریب بھی پڑتی ہے۔

لہذا مہربانی فرما کر سائل کو شیڈ گرافر (B-14) کی خالی پوسٹ پر تعینات کیا جائے۔ سائل آپ کی لمبی عمر اور بہتر صحت کے لئے

دعا گو رہے گا۔

العارض

[Handwritten signature]

S/C GHSS Kaghan

I have No objection
the post of stenographer is laying
valant B-14 -

[Handwritten signature]
DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA



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Annexure E

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**
Phone: 091-9225344 Email: ddadm.es@gmail.com

OFFICE ORDER

Mr. Waqas Ahmad Senior Clerk BPS-14 GHSS Kaghan District Mansehra is hereby transferred/adjusted against the vacant post of Stenographer BS-14 at DEO (F) Mansehra on his own pay and BPS in the interest of public service with immediate effect.

Note:

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endsl: No. 9097-29 /F.No.343/A-23/MS/Transfer/Mansehra

Dated Peshawar the 10-10 2023

Copy forwarded to the: -

1. District Education Officer (Male/Female) Mansehra.
2. District Account Officer concerned.
3. Principal GHSS Kaghan District Mansehra.
4. Official concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master File.

Assistant Director (Admin)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

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Annexure
"F"

Certificate of Transfer of Charge

1. Certified that we have on the afternoon/before noon of this day on 02-11-2022 Forenoon/AN) respectively made over relieved & relieving charge of this post/office of Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No. 5352-5432/A-23/MS/Proposal J/C to S/C/2022 Dated Peshawar the: 01/11/2022.
2. Particulars of cash & important secrets & confidential documents handed over are noted on the reverse.

Signature of Received

Govt; Servant: WAQAS AHMAD

Designation: SENIOR CLERK (B-14)

Station: GHSS KAGHAN

Dated: 02-11-2022

Signature of Relieving:-

Govt; Servant: Against V. Post

Designation: SENIOR CLERK (B-14)

Endst: No. 181-185 Dated 2/11 /2022

Copy forwarded for information to the:-

1. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Mansehra
3. District Accounts Officer Mansehra
4. Office File.

P. P. P.
PRINCIPAL
GHSS KAGHAN MANSEHRA

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ANNEXURE G



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-9225344 Email: ddadmna_esc@gmail.com

OFFICE ORDER

The Services of the following Ministerial Staff are hereby placed at the disposal of Directorate of E&SE Khyber Pakhtunkhwa, Peshawar for further adjustment in the best interest of public service with immediate effect.

S. #	Name/Design:	Present place of Posting	Adjusted at
1	Mr. Waqas Ahmad, J/Clerk (B-11)	DEO (F) Masehra	Disposal of Directorate of E&SE
2	Mr. Kashif Bilal, J/Clerk (B-11)	SDEO(Female) Burikot, Masehra	Disposal of Directorate of E&SE
3	Usama Qazi, J/Clerk (B-11)	GCIS Tanogri, Dajla	Disposal of Directorate of E&SE

Note:-

1. Complinee report should be submitted to all concerned.
2. No TA/DA etc is allowed.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4395-4405 /F.No.343 /A-23/MS/Transfer Masehra
Dated Peshawar the 14/05/2024

Copy forwarded to the: -

1. District Education Officer (F) Masehra with the direction to relieve them immediately.
2. District Account Officer Masehra.
3. SDEO Concerned.
4. Principal concerned.
5. Official concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File:

Gani 14/05/2024
Deputy Director (F&A)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

(47)

HANNAH
H

To

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

Subject:-

APPEAL AGAINST THE IMPUGNED ORDER VIDE ENDST. NO. 4395-4405 DATED PESHAWAR 14/05/2024 PASSED BY THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKTUNKHWA PESHAWAR

Respected Sir,

Reference on the subject cited above and to state that the detailed comments of appeal are as under:-

1. That Mr. Waqas Ahmad J/C was promoted by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide promotion order Endst. No. 5352-5432 dated Peshawar the 01/11/2022 and posted at GHSS Kaghan, whereas the appellant took over the charge of the said post and performed his duty regularly with zeal and zest.
2. That the appellant submit the application to the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with the reason that the appellant is disable person and residence of City Manshera and the appellant performed his duty at GHSS Kaghan as S/C since 01/11/2022 to 10/10/2023, whereas the school is situated at Jar Ilung area of Tehsil Balakot and the appellant cannot travel due to disability (Disability certificate is attached), whereas one post was lying vacant in the Office of the DEO(F) Manshera and the appellant got NOC from both the offices DEO(M) & DEO(F) Manshera and submitted alongwith the

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application to the Director Elementary & Secondary Education Peshawar.

3. That in the light of such application submitted by the appellant to the Director Elementary & Secondary Education adjusted the appellant at the Office of the DEO(F) Mansehra vide Endst: No. 9027-29 dated 10/10/2023, whereas the appellant implement the order of the competent authority and took over charge at the said post with zeal and zest and perform his duty regularly in the Office of the DEO(F) Manselhra w.e.f 11/10/2023 (only 06 months) and the transfer order issued by the Director Elementary & Secondary Education is against the norms of justice, against the tenure policy, due to political involvement the designation of the appellant mistakenly mention as J/C (B-11) while the appellant serving as S/C (B-14) at the Office of the DEO(F) Manselhra.
4. That another order passed by the Director Elementary & Secondary Education Khyber Paktunkhwa Peshawar vide No. 4395-4405 dated 14/05/2024 transfer from DEO(F) Manselhra to the disposal of Director Elementary & Secondary Education Khyber Paktunkhwa Peshawar without any allegation/reason without consideration of any sound justification and grounds, but on personal grudges and such transfer on political grounds and personal liking and disliking.
5. That the order passed by the Director Elementary & Secondary Education Khyber Paktunkhwa Peshawar against the law, rules and policy, posting transfer policy, facts and norms of the justice.
6. That the impugned act of the respondent department is illegal, unlawful, without lawful authority, arbitrary, perverse, against the

(49)

- principals of natural justice, hence, ineffective upon the rights of the appellant.
7. That the appellant was transferred in haphazard manners, without consideration of any sound justification and grounds, discarding the public interest, but on personal grudges and such posting transferred on political ground and against the posting transfer policy.
 8. That no reason have been mentioned in the order vide Endst. No. 4395-4405 dated 14/05/2024 which is the violation of Clause-24-A of General Clause Act.
 9. That the order passed by the respondents is not rational one and based on personal liking and disliking.
 10. That the treatment meted-out to the appellant is a clear violation of fundamental rights of the appellant.

PRAYER:-

It is mostly humbly requested that the appeal of the appellant may be accepted and withdraw the impugned order vide No. 4395-4405 dated 14/05/2024.

(Signature)
20/5/2024
(Waqas Ahmad S/C)
DEO (Female) Mansehra
(Signature)

Dated:- 20-05-2024

3/4 580 7662

Copy for information to the:-

1. PA to Director Elementary & Secondary Education Khyber Paktunkhwa Peshawar
2. District Education Officer (Female) Mansehra.

50

DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA



@ dir.education@khyber.gov.pk

Dated: 22/06/2024

No. 17873

pay stop letter

To: Mr. Waqas Ahmed Senior Clerk Ex this office
now at the disposal of Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa Peshawar

SUBJECT: HAND OVER THE CHARGE

Memo: As you aware that your disposal order issued vide Director
Elementary & secondary Education Khyber Pakhtunkhwa Peshawar under Endstt. No.
2395-2405 Dated 14/05/2024, with the direction to DEO (female) Mansehra to relieved
you immediately.

You are hereby directed to hand over the proper charge and records
of each and every thing of all posts where you have served the duty in this office i.e. as a
PA/Dealing Assistant of cadre records etc to concerned Dealing Assistant of DEO (F)
Mansehra for issuance of relieving chit and submit a copy of annual report at office of
the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for
completion of record immediately. In case of non compliance your report will be
submitted to high up for further proceedings

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Dated 22/06/2024

Endstt. No. 17873-73

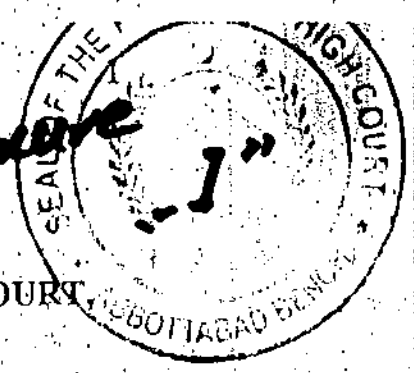
Copy for information & further necessary action to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with
reference to above cited no.
2. The B&AO local office with the direction to stamp the job in respect of Waqas
Ahmed Senior Clerk.
3. Office Copy.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

(57)

Annexure - J



BEFORE THE PESHAWAR HIGH COURT
BENCH ABBOTTABAD

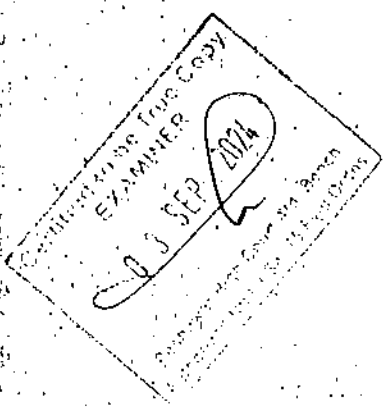
W.P No. _____ of 2024

Waqas Ahmed son of Aurangzeb resident of near Kohisar Flour Mills, Mohallah Upper Channai, Mansehra, Tehsil and District Mansehra presently Senior Clerk/ Stenographer, District Education Officer (Female), Mansehra PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
 2. Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
 3. District Education Officer (Female), Mansehra.
 4. Sub Divisional Education Officer, Mansehra.
- RESPONDENTS.

WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973 FOR A
DECLARATION TO THE EFFECT THAT
THE PETITIONER IS ENTITLED TO
CARRY ON HIS DUTIES AS SENIOR
CLERK/STENOGRAPHER IN THE OFFICE
OF DISTRICT EDUCATION OFFICER
(FEMALE), MANSEHRA ON THE BASIS



FILED TODAY

FILED IN REGISTER
ABBOTTABAD BENCH

322-07-024

(52)

OF THE ORDER BEARING NO.9027-
29/F.NO.343/A-23/MS/TRANSFER/MANSEHRA
DATED 10.10.2023 AND ALSO ENTITLED
TO COMPLETE THE TENURE AS PER
THE POLICY, RULES AND REGULATIONS
OF THE EDUCATION DEPARTMENT.
NON-CONSIDERING THE TENURE
POLICY BY THE RESPONDENTS AND
CONSEQUENTLY IMPUGNED OFFICE
ORDER BEARING ENDST. NO.4395-4405
DATED 14.05.2024 WHEREBY THE
PETITIONER WAS TRANSFERRED
FROM THE OFFICE OF DISTRICT
EDUCATION OFFICER (FEMALE),
MANSEHRA AND KEPT AT THE
DISPOSAL OF DIRECTORATE OF
E&SE AND WITHHOLDING THE
MONTHLY SALARIES OF THE
PETITIONER ARE WRONG, ILLEGAL,
AGAINST THE LAW AND FACTS,
ARBITRARY, FANCIFUL, PERVERSE,
AGAINST THE RULES AND REGULATION,
AGAINST THE FUNDAMENTAL
RIGHTS OF THE PETITIONER HENCE
BEING UNCONSTITUTIONAL, LIABLE
TO BE STRUCK DOWN.

PRAYER: -

FILED TODAY

On acceptance of the instant Writ
 Petition, non-considering the tenure

ADD. REGISTRAR
 P.O. ADOLTA BAHAMANI

22.07.24

(53)

policy by the respondents and consequently impugned office order bearing Endst. No.4395-4405 dated 14.05.2024 whereby the petitioner was transferred from the office of District Education Officer (Female), Mansehra and kept at the disposal of Directorate of E&SE and withholding the monthly salaries of the petitioner may please be declared as wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the rules and regulation, against the fundamental rights of the petitioner hence being unconstitutional, be struck down and the petitioner may please be permitted to carry on his duties as Senior Clerk/Stenographer in the office of District Education Officer (Female), Mansehra and also to pay the monthly salaries to the petitioner regularly or any other writ, order or relief as this Honourable court deems fit and appropriate in the circumstances of the case, may also be issued/passed.



FILED TODAY

ADD. REGISTRAR
P.H.C. ABBOTTABAD DISTRICT

22.07.24

54

Respectfully Sheweth!

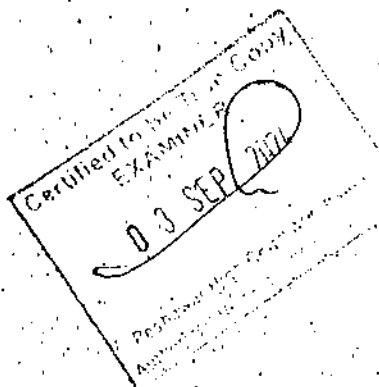
1. That, the petitioner is a bonafide resident of district Mansehra.

(Copy of the CNIC of the petitioner is annexed as annexure "A").

2. That, the petitioner was duly inducted in the respondents' department as Junior Clerk after fulfillment of all the legal and codal formalities and since his appointment, the petitioner is working with great zeal and zest.

(Copy of the service book of the petitioner is annexed as annexure "B").

3. That, later on, the petitioner was duly promoted by the Director Elementary and Secondary Education, Peshawar vide promotion order Endst. No.5352-5432 dated 01.11.2022 and after such promotion, the petitioner was posted at Government Higher Secondary School, Kaghan and in consequence of the said order, the petitioner duly took over the charge of the said post and started to perform his duty.



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REGISTRAR
PESHAWAR

22-07-2024

(55)

*(Copies of the promotion order
alongwith charge assumption report
are annexed as annexure "C").*

4. That, as the petitioner is a disable person and also the resident of District Mansehra, therefore, the petitioner submitted an application Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar for his adjustment at nearest station i.e. at the post lying vacant in the office of District Education Officer (Female), Mansehra and later on, the petitioner got NOC from both the offices i.e. District Education Officer (Male) and District Education Officer (Female), Mansehra and the same was submitted to Director, Elementary and Secondary Education, Peshawar.

*(Copies of the application alongwith
NOC are annexed as annexure "D").*

5. That, in the light of the petitioner's application, the petitioner was adjusted against the post of Senior clerk/Stenographer in the office of District Education Officer (Female), Mansehra vide office Endst. No.9027-29 dated 10.10.2023.

Original to be Taken Copy
EXAMINER
03 SEP 2024
Peshawar High Court, 1st Bench
District Education Officer, Mansehra

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ADD. REGISTRAR
P.H.C. MANSEHRA

322-07-024

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(Copy of the order dated 10.10.2023 is annexed as annexure "E").

6. That, the petitioner in response to the office order dated 10.10.2023 duly took over the charge against the post of Senior Clerk/Stenographer and started to perform his duties.

(Copy of the charge assumption report is annexed as annexure "F").

7. That, the ink of the office order dated 10.10.2023 has not been dried in the meanwhile, the respondents issued impugned office order bearing No.4395-4405 dated 14.05.2024 whereby the petitioner was transferred from the office of District Education Officer (Female), Mansehra and kept at the disposal of Directorate, Elementary and Secondary Education, Peshawar although the petitioner has made arrival at Directorate office but the petitioner is suffering from severe physical and mental agonies.

(Copy of the impugned office order dated 14.05.2024 is annexed as annexure "G").

- That, the petitioner feeling himself aggrieved from the impugned office

RECEIVED
12/07/2024
DIRECTORATE
ELEMENTARY AND SECONDARY EDUCATION
PESHAWAR

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ADD REGISTRAR
PESHAWAR
12-07-24

(57)

order dated 14.05.2024 submitted a departmental appeal to Secretary, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar which is still unattended to.

(Copy of the departmental appeal is annexed as annexure "H").

9. That, the petitioner ran from pillar to post for the redressal of his genuine grievances but in vain rather the respondents are bent upon to act upon the impugned office order and also bent upon to stop/withheld the salaries of the petitioner, therefore, the petitioner having no other adequate, alternate, efficacious or speedy remedy except to invoke the constitutional jurisdiction of this Honourable court, inter alia, on the following grounds: -

GROUNDS

- i. That, non-considering the tenure policy by the respondents and consequently impugned office order bearing Endst. No.4395-4405 dated

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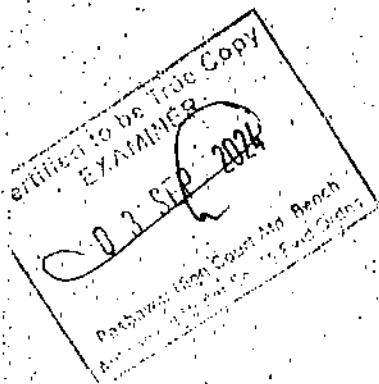
ADDL REGISTRAR
PESHAWAR

22.07.24

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14.05.2024 whereby the petitioner was transferred from the office of District Education Officer (Female), Mansehra and kept at the disposal of Directorate of E&SE and withholding the monthly salaries of the petitioner are wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the rules and regulation, against the fundamental rights of the petitioner hence being unconstitutional, liable to be struck down.

- ii. That, it is an admitted fact that the petitioner has duly been appointed by the respondents' department and there is no any legal defect in the appointment of the petitioner. Similarly, it is also an admitted fact that the petitioner was later on adjusted against the impugned post by the respondents in the light of the office order dated 10.10.2023 and there is no any legal defect in issuance of the adjustment order of the petitioner hence no authority rests with the respondents to pass any other detrimental to such adjustment order of the petitioner.



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ADIT REGISTRAR
P.H.C. ABBOTTABAD BENCH
322.07.024

iii. That, it is an admitted fact that the tenure policy for posting and transfer has duly been introduced by the respondents' department and as per tenure policy, least tenure for posting at any post is 2/3 years whereas in the matter in hand, the petitioner has been transferred after 06 months of the office order dated 10.10.2023 thus the impugned office order dated 14.05.2024 has been issued in clear violation of the tenure policy of the education department and thus the same has no legal sanctity in the eyes of law.

iv. That, the impugned office order dated 14.05.2024 has not been issued in public interest rather the same is the result of political influence and that too in clear violation of the relevant law, rules and regulations hence the impugned office order has no legal footings to stand upon.

v. That, the impugned office order has been passed without any allegations/ reason and without consideration of any sound justification and grounds but on personal grudges, the

Handwritten signature and stamp of the Registrar.

FILED TODAY

ADD. REGISTRAR
PUC. ABU TARBAN DECCAN

22.07.24

impugned office order has been passed/issued.

vi. That, no legal, valid or legitimate justification has been given/record by the respondents in support of the impugned order rather the respondents while considering them above the law has issued the impugned office order.

vii. That, it is well settled by now that the political figures have nothing to do with the transfer and posting of the employees whereas in the matter in hand, the respondents while making themselves pawn in the hands of the political figures have passed/issued the impugned order without adopting the relevant law, rules and regulations.

viii. That, there are no any administration disciplinary or other grounds exist with the respondents to disturb the service of the petitioner under the garb of the impugned office order. Similarly, there is no any public or departmental complaint of misconduct against the petitioner nor there is any criminal case against the petitioner.

ATTACHED TO THE FOUR COPY
EXAMINER
03 SEP 2024

FILED TODAY
ADD. REGISTRAR
PUC ARBOREXAND BEACH
22.07.24

(61)

ix. That, the petitioner has never been afforded an opportunity of being heard rather the respondents without any rhyme and reason and without any fault on the part of the petitioner have issued the impugned officer order just to make happy the political figures of the area.

x. That, height of injustice is that at one hand, the services of the petitioner has been disturbed by the respondents' department whereas on the other hand, the respondents are bent upon to stop/withheld the monthly salaries of the petitioner which is also a mockery with the helplessness of the petitioner as there is no any fault or negligence on the part of the petitioner regarding performance of duties.

xi. That, the petitioner hails from a poor family of the locality and the salary is the only source of earning of the petitioner's family and in case if the salary of the petitioner has been stopped then not only the petitioner but his family would also be disturbed and similarly, stoppage of salary also

07 SEP 2024
REGISTRAR
ABBOTTABAD BENCH

FILED TODAY
REGISTRAR
ABBOTTABAD BENCH

522-07-024

effects the future service rights of the petitioner:

xii. That, by keeping the petitioner at the disposal of the Director, Elementary and Secondary Education, Peshawar, the petitioner has been hanged in the air by the respondents hence in such situation, the petitioner would be totally at total mercy of the Directorate office which is also not the mandate of law and justice.

xiii. That, the impugned office order issued by the respondents offends all norms of justice, fair play, equity, good conscious and such act of the respondents encroaches upon the fundamental rights of the petitioner as guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.

xiv. That, the powers or jurisdiction are vested in an authority to exercise it justly, fairly, honestly, judiciously and in accordance with the mandate of law, rules and regulations but the respondents have transgressed upon their powers while dealing with the matter in hand.

Original to be filed Copy
EXAMINED
03 SEP 2024
Peshawar High Court, Old Bench
Authorised Officer SA-75, Peshawar

FILED TODAY
ADD. REGISTRAR
P.H.C. ABBOTTABAD BECH II
22.07.24

63

xv. That, it is an inalienable right of the petitioner to enjoy the protection of law and to be treated in accordance with law, rules and regulations but such rights of the petitioner are being infringed by the respondents in a sheer malafide manner.

.....PRAYER.....

It is, therefore, most humbly prayed that on acceptance of the instant Writ Petition, non-considering the tenure policy by the respondents and consequently impugned office order bearing Endst. No.4395-4405 dated 14.05.2024 whereby the petitioner was transferred from the office of District Education Officer (Female), Mansehra and kept at the disposal of Directorate of E&SE and withholding the monthly salaries of the petitioner may please be declared as wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the rules and regulation, against the fundamental rights of the petitioner hence being unconstitutional,

2024
2024
2024

FILED TODAY

ADD REGISTRAR
PUC - MANSEHRA DISTRICT

322.07.024

(64)

be struck down and the petitioner may please be permitted to carry on his duties as Senior Clerk/Stenographer in the office of District Education Officer (Female), Mansehra and also to pay the monthly salaries to the petitioner regularly or any other writ, order or relief as this Honourable court deems fit and appropriate in the circumstances of the case, may also be issued/passed.



INTERIM RELIEF.

It is further requested that the operation of the impugned order bearing Endst. No.4395-4405 dated 14.05.2024 may please be suspended and the respondents may please be directed to pay the monthly salaries of the petitioner regularly till the disposal of the titled Writ Petition.

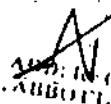
Dated 24.07.2024

Waqas Ahmed
...Petitioner

Through



**SARDAR WAQAR-UL-MULK,
SARDAR WAJIH-UL-MULK,
Advocates High Court,
Mansehra.**

FILED TODAY


**MR. REGISTRAR
P.O. ABBOTTABAD DISTRICT**

22-07-2024

(65)

AFFIDAVIT.

I, Waqas Ahmed son of Aurangzeb resident of near Kohisar Flour Mills, Mohallah Upper Channai, Mansehra, Tehsil and District Mansehra presently Senior Clerk/ Stenographer, District Education Officer (Female), Mansehra, petitioner, do hereby solemnly affirm and declare on oath that the contents of the foregoing Writ Petition are true and correct and nothing has been concealed from this Honourable Court.

Dated 22.07.2024

Waqas Ahmed
Waqas Ahmed
(DEPONENT)

13501-6028031-5

Not to be True Copy
EXAMINER
03 SEP 2024
Peshawar High Court And Bench
Abbottabad Bench

4040
Said that the above was verified
to me on this 22 day July 24
Waqas Ahmed at *Aurangzeb*
near Kohisar Flour Mills Mohallah
Upper Channai Mansehra
which is personally known to me

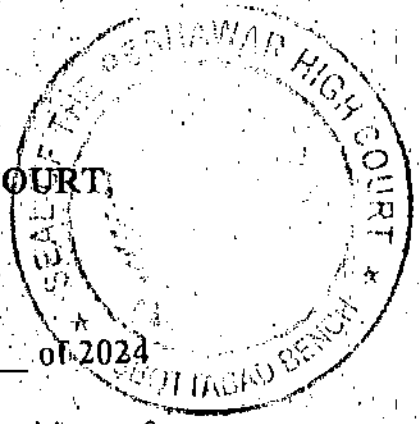
ADDITIONAL JUDGE
Peshawar High Court, Abbottabad Bench

FILED TODAY
ADD REGISTRAR
ABBOTABAD BENCH
22.7.2024

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1

BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD



W.P No. _____ of 2024

Waqas Ahmed son of Aurangzeb resident of near Kohisar Flour Mills, Mohallah Upper Channai, Mansehra, Tehsil and District Mansehra presently Senior Clerk/ Stenographer, District Education Officer (Female), MansehraPETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
 2. Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
 3. District Education Officer (Female), Mansehra.
 4. Sub Divisional Education Officer, Mansehra.
-RESPONDENTS.

WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973 FOR A
DECLARATION TO THE EFFECT THAT
THE PETITIONER IS ENTITLED TO
CARRY ON HIS DUTIES AS SENIOR
CLERK/STENOGRAPHER IN THE OFFICE
OF DISTRICT EDUCATION OFFICER
(FEMALE), MANSEHRA ON THE BASIS

Certified to be True Copy
EXAMINER
26/07/2024
Peshawar High Court and Bench
Authorized Officer Sd/- J.S. Farooq

FILED TODAY

ADD: REGISTRAR
PESHAWAR BENCH
ABBOTTABAD

322-07-024

(67)

2

OF THE ORDER BEARING NO.9027-
29/F.NO.343/A-23/MS/TRANSFER/MANSEHRA
DATED 10.10.2023 AND ALSO ENTITLED
TO COMPLETE THE TENURE AS PER
THE POLICY, RULES AND REGULATIONS
OF THE EDUCATION DEPARTMENT.
NON-CONSIDERING THE TENURE
POLICY BY THE RESPONDENTS AND
CONSEQUENTLY IMPUGNED OFFICE
ORDER BEARING ENDST. NO.4395-4405
DATED 14.05.2024 WHEREBY THE
PETITIONER WAS TRANSFERRED
FROM THE OFFICE OF DISTRICT
EDUCATION OFFICER (FEMALE),
MANSEHRA AND KEPT AT THE
DISPOSAL OF DIRECTORATE OF
E&SE AND WITHHOLDING THE
MONTHLY SALARIES OF THE
PETITIONER ARE WRONG, ILLEGAL,
AGAINST THE LAW AND FACTS,
ARBITRARY, FANCIFUL, PERVERSE,
AGAINST THE RULES AND REGULATION,
AGAINST THE FUNDAMENTAL
RIGHTS OF THE PETITIONER HENCE
BEING UNCONSTITUTIONAL, LIABLE
TO BE STRUCK DOWN.

Copy
26/10/2024
Peshawar High Court Atd Bench
Authorized Under Sec 15 Evid Ordnc

PRAYER: -

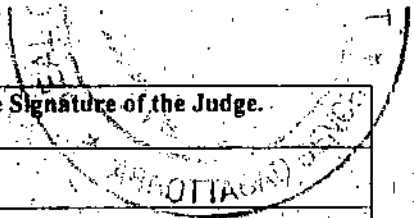
FILED TODAY

ADD. REGISTRAR
P.C. ABBOTTABAD BENCH

22.07.24

On acceptance of the instant Writ
Petition, non-considering the tenure

ORDER SHEET



Date of Order of Proceedings	Order or other Proceedings with the Signature of the Judge.
1	2
23.07.2024	<p>WP No. 765-A/2024</p> <p>Present: Sardar Waqar-ul-Mulk, Advocate, for petitioner.</p> <p>Sardar Basharat, learned Additional Advocate General, for respondents.</p> <p>***</p> <p><u>MUHAMMAD IJAZ KHAN, J.</u>- At the very outset, learned counsel for the petitioner states that he is cognizant of the fact that the petitioner is a civil servant and that the controversy which he has agitated pertains to his transfer from Hazara Region to the Directorate of Elementary & Secondary Education, Peshawar, however, he further states that within seven days of passing the impugned order, the petitioner has filed a departmental appeal before the respondent No. 1 on 20.05.2024 but till date the same has not been decided. He further states that petitioner would be satisfied if respondent No. 1 is directed to decide the departmental appeal of the petitioner at the earliest. When confronted, the learned AAG stated that he would have no objection if a reasonable time may be given to respondent No. 1 to decide the departmental appeal of the petitioner.</p>

Certified to be true Copy
EXAMINER
26/07/2024
Peshawar High Court Ad Bench
Authorized Under Sec 75 Evid Ordns

[Handwritten signature]
-03

(69)

2. Accordingly, this writ petition is disposed of with the direction to respondent No. 1 to decide the departmental appeal of petitioner pending before it within a period of fifteen (15) days from today.


JUDGE

Certified True Copy
EXHIBIT
2023
Peshawar High Court Bench
Authorised Officer

(Mr. Justice Muhammad Ijaz Khan)



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-8225344 Email: ddadmni.ess@gmail.com

Annexure

"J"
P-70

OFFICE ORDER

Consequent upon approval of the competent authority transfer/adjustment in respect of the following officials are hereby ordered on their own pay and BPS in the interest of public service with effect from the date of their taking over charge:

S. #	Name/Design.	Present Posting	Adjustment at.	Remarks
1	Mr. Waqas Ahmad Senior Clerk BPS-14	DEO (F) Mansehra (Under disposal of this Directorate)	DEO (M) Mansehra	Vice S.No.2
2	Mr. Muhammad Ajmal Senior Clerk BPS-14	DEO (M) Mansehra	DEO (F) Mansehra	A.V.P of Stenographer BPS-14
3	Mr. Kashif Bilal Junior Clerk BPS-11	SDEO (F) Barikot Mansehra (Under disposal of this Directorate)	GHSS Bangar Mansehra	A.V.P
4	Mr. Osama Qazi Junior Clerk BPS-11	GHSS Tanagri Balla Mansehra	GHSS Mangloor Mansehra	A.V.P

Note:-

1. Compliance report should be submitted to all concerned.
2. No TADA etc is allowed.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

834-37
Endst. No. /F.No.343/A-23/MB/Transfer/Mansehra

Dated Peshawar the 22/08/2024

Copy forwarded to the:-

1. District Education Officer (Male) Mansehra with the remarks to adjust the officials at S.No. 1, 3 and 4 for the purpose of pay at any vacant post from the date of their relieving.
2. District Education Officer (Female) Mansehra.
3. District Accounts Officer Mansehra.
4. SDEO Concerned.
5. Principal/IM Concerned.
6. Officials concerned.
7. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
8. Master file.

P
22/08/2024
ASSISTANT DIRECTOR (ADMN)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar



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

No. 4330

/F.No.343/A-23/MS/Transfer/Mansehra

Dated Peshawar the 26-8 /2024

Phone: 091-9225344

Email: ddadm.ese@gmail.com

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To

The District Education Officer
(Male) Mansehra.

Subject:

COMPLIANCE OF THIS OFFICE ORDER NO. 834-37 DATED 02/08/2024

Memo:

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application submitted by Mr. Waqas Ahmad Senior Clerk and to direct you to implement this office order No. 834-37 dated 02/08/2024, in the light of Administration Department letter No. SO (SM)E&SED/11-1/Misc/2023 dated 15/08/2023 under intimation to this office immediately.

Assistant Director (Admn)
Directorate of E&SE K.P, Peshawar

Endst; No.

6331-321

Copy forwarded to the:-

1. Mr. Waqas Ahmad Senior Clerk office of the DEO (M) Mansehra.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

Assistant Director (Admn)
Directorate of E&SE K.P, Peshawar

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Annexure
"K"

ARRIVAL REPORT

In compliance of the Director Elementary & Secondary Education Khyber Paktunkhwa Peshawar vide No. 834-37/F.No.343/A-23/MS/Transfer/Mansehra dated Peshawar the 02/08/2024. I Mr. Waqas Ahmad Senior Clerk (B-14) Is hereby submit my arrival report today on 03/02/2024 In the Office of the District Education Officer (Male) Mansehra.

(Handwritten signature)
3/8/2024
(Waqas Ahmad)
Senior Clerk (B-14)
DEO (M) Mansehra

COUNTERSIGNED:-

73

Annexure
"L"

To

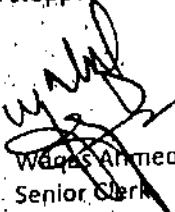
The District Education Officer,
(Male) Mansehra.

Subject: -
Memo,

Arrival Report.

With due respect it is stated that I Mr. Waqas Ahmed Senior Clerk attend your office on 03-08-2024, regarding arrival in compliance of the Director Elementary and Secondary Education Khyber Pakhtunkhwa order Endsit: No 834-37/F.No.343/A-23/MS/Transfer/Mansehra Dated Peshawar 02-08-2024.

Further Stated that today on 09-08-2024, second time attend your office with the request to acknowledge my arrival report. The pay of the applicant was stopped from last two months it is much difficult to survive for the applicant in the society.


Waqas Ahmed
Senior Clerk

09/8/2024

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ANNEXURE
"M"

To

The Director,
Elementary and secondary education,
Khyber Pakhtunkhwa Peshawar.

Subject: - APPEAL FOR COMPLIANCE OFFICE ORDER NO 834-37 DATED 02-08-2024.

Respected sir,

Reference on the subject cited above and to stat that the appellant attend the office of the District Education Office (Male) Mansehra many time for compliance of office order Endstt: No 834-37/F.No.343/A-23/MS/transfer/Mansehra Dated Peshawar the 02-08-2024, but the concerned authority is not ready to compliance the above mentioned order for S.No 01 and S.No 02 due to unknown reason.

Furthermore, the appellant is understood that there is political interference behind it who did not allow to compliance the office order, due to that the appellant and his family suffers, the treatment meted-out to the appellant is a clear violation of fundamental rights of the appellant which is not affordable for the appellant. The pay of the appellant was stopped with effect from 01-07-2024.

PRAYER:-

It is most humbly requested that the office order issued by your good office Endstt: No 834-37/F.No.343/A-23/MS/transfer/Mansehra Dated Peshawar the 02-08-2024, may be implemented, OR accommodate the appellant at GGHSS New Darband agalst the vacant post of Senior Clerk (B-14) along with pay purpose with effect from 01-07-2024, please.

Waqas Ahmed
15/8/2024

Waqas Ahmed
Senior Clerk



No. SO(SM) E&SE/D/1-1/Misc/2023
Peshawar, Dated 15.08.2023

To

1. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.
2. All District Education Officers (Male & Female)
Khyber Pakhtunkhwa.

Subject - **CIRCULAR REGARDING IMPLEMENTATION OF
ORDERS/NOTIFICATIONS/INSTRUCTIONS**

I am directed to refer to the subject noted above and to state that it has been observed that the Head of Subordinate Offices/Educational Institutions/Principals/Lead Masters often create hurdles in implementation of orders/notifications issued by the Competent Authority which is misconduct under E&D Rules 2011.

2. The above in view, I am directed to convey that henceforth if information regarding non-implementation of orders/notifications/instructions of this Department by any Officer/Official of Subordinate Offices/Educational Institutions is received then strict disciplinary action shall be taken against the delinquent Officer/Official under E&D Rules 2011.

3. The matter may be treated as most urgent and circulated to all concerned for compliance.

(ABDUL HAQ)

SECTION OFFICER (SCHOOLS/MALE)

Copy of the above is forwarded to the:-

1. PS to Secretary E&SE Department.
2. PA to Additional Secretary (E) E&SE Department.
3. PA to DS (Admn), E&SE Department.
4. Office order file.

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The Director,
Elementary and Secondary Education,
Khyber Pakhtunkhwa Peshawar.

Subject: SECOND TIME APPEAL FOR ADJUSTMENT.

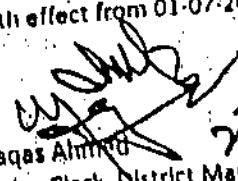
Respected Sir/Madam,

With due respect it is stated that the appellant attend the office of the District Education Officer (Male) Manshehra, according to your letter No. 6330/F.No.343/A-23/MS/Transfer/Manshehra Dated Peshawar the 20-08-2024, for Compliance of transfer order No 834-37 Dated 02-08-2024 issued by your good office, but the concerned authority i.e (District Education Officer (Male) Manshehra) refuse second time.

It is requested that the pay of the appellant was stopped with effect from 01-07-2024, the appellant have two school going children, and no other source of income to survive in the society. Family of the appellant is suffered, the fundamental right of the appellant is also destroyed due to treatment meted-out.

PRAYER:

The appellant is disable also and cannot survive, without Salary, (CNIC Attached) post of senior clerk BPS-14 is laying vacant at GGHS New Darband Manshehra, please accommodate the appellant at above mention station (i.e) GGHS New Darband along with pay purpose with effect from 01-07-2024.


Waqas Ahmed
Senior Clerk District Manshehra
22/8/2024



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**OFFICE OF THE PRINCIPAL, GGHS NEW DARBAND
DISTRICT (MANSEHRA)**

*Annexure
"0"*

(TO WHOM IT MAY CONCERNED)

POST AVAILABILITY CERTIFICATE

IT IS TO CERTIFY THAT A POST OF SENIOR CLERK (BPS 14) IS LYING VACANT AT
GGHSS NEW DARBAND DISTRICT MANSEHRA.

THIS OFFICE HAS NO OBJECTION TO APPOINTING AN OFFICER/ADJUTANT MAJOR/MAJOR
AS SENIOR CLERK AGAINST THIS VACANT POST.

CERTIFICATE ISSUED TO WHOM IT MAY CONCERNED PLEASE

Principal
GGHSS New Darband
Mansehra

PRINCIPAL

23/4
1/2

DBAM No. 175

BC No. 10-2-8 16

Name of Advocate سید وارث احمد

S.No 49222

Fee Rs. 200/-



2024-25
SECRETARY
District Bar Association
Mansehra

وکالت نامہ

عدالت: جناب فیروز محمد نواز سروس ٹریبیونل منسہرہ

عنوان: وفاقی عدالت منسہرہ بنام سید وارث احمد فیروز محمد نواز سروس ٹریبیونل منسہرہ

منجانب: ایڈوائس نوعیت مقدمہ: سروس ایپل

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام عدالت سروس ٹریبیونل کے لئے جناب سید وارث احمد کو وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہوا یا پکھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر ڈگری و رضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری کی طرف درخواست حکم استماعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف کو بشرط ادا نیگی علیحدہ محتاتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدو راں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداختہ وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے اور دستخط انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

دفعہ 140
مذکورہ بالا دستخط و تائید
سید وارث احمد

مورخہ 20

ACCEPTED