

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Naseer Ahmad v/s Govt of K.P.K

| S# | CONTENTS | Yes | No |
|-----|--|-----|----|
| 1. | This Appeal has been presented by <u>Javed Iqbal Gulbela</u> | | |
| 2. | Whether counsel / appellant / respondent / deponent have signed the requisite document? | / | |
| 3. | Whether appeal is within time? | / | |
| 4. | Whether appeal enactment under which the appeal is filed is mentioned? | / | |
| 5. | Whether enactment under which the appeal is filed is correct? | / | |
| 6. | Whether affidavit is appended? | / | |
| 7. | Whether affidavit is duly attested by competent oath commissioner? | / | |
| 8. | Whether appeal / annexure are properly paged? | / | |
| 9. | Whether certificate regarding filing any earlier appeal in the subject, furnished? | / | |
| 10. | Whether annexures are legible? | / | |
| 11. | Whether annexures are attested? | / | |
| 12. | Whether copies of annexures are readable/ clear? | / | |
| 13. | Whether copies of appeal is delivered to AG/ DAG? | / | |
| 14. | Whether Power of Attorney of the counsel engaged is attested and signed by Petitioner/ Appellant/ Respondents? | | |
| 15. | Whether number of referred cases given are correct? | / | |
| 16. | Whether appeal contains cutting / overwriting? | | |
| 17. | Whether list of books has been provided at the end of the appeal? | / | |
| 18. | Whether case relate to this Court? | | |
| 19. | Whether requisite number of spare copies are attached? | / | |
| 20. | Whether complete spare copy is filed in separate file cover? | | |
| 21. | Whether addresses of parties given are completed? | / | |
| 22. | Whether index filed? | / | |
| 23. | Whether index is correct? | | |
| 24. | Whether security and process fee deposited? On _____ | | |
| 25. | Whether in view of Khyber Pakhtunkhwa Service Tribunal Rule 1974 rule 11, Notice along with copy of appeal and annexure has been sent to respondents? On _____ | | |
| 26. | Whether copies of comments / replay/ rejoinder submitted? On _____ | | |
| 27. | Whether copies of comments / replay/ rejoinder provided to opposite party? On _____ | | |

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

Name: Javed Iqbal Gulbela

Signature: - [Signature]

Dated: - 24/9/2022

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

In Re S.A. 417/2022

Naseer Ahmed

VERSUS

Government of Khyber Pakhtunkhwa & Others

INDEX

| S# | Description of Documents | Annex | Pages |
|-----------|--|--------------|----------------|
| 1. | Grounds of Appeal | | 1-6 |
| 2. | Affidavit | | 7 |
| 3. | Addresses of parties | | 8 |
| 10. | Copy of Impugned Notification Dated 15/11/2021 | "A" | 9 |
| 11. | Copy of Impugned Seniority Lists Dated: 30/10/2021 & 08/11/2021 | "B & C" | 10-12 13-15 |
| 12. | Copy of Departmental Appeal Dated: 18/11/2021 | "D" | 16 |
| 13. | Copy of Departmental Appeal Dated: 07/12/2021 | "E" | 17 |
| 14. | Other Documents | "F-I" | 18-25 |
| 15. | Wakalatnama | | 26 |

Dated: 22/03/2022

Appellant
Through

Javed Iqbal Gubela
Advocate
Supreme Court of Pakistan

(1)

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

In S.A _____/2022

Naseer Ahmad, Senior Clerk at Deputy Commissioner Office, District
Mohmand.

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Food Department
at Civil Secretariat Peshawar.
2. Deputy Commissioner, District Mohmand.
3. Secretary Finance Department, Government of Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.

..... Respondents

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT -1974 DECLARING THE
APPELLANT AS INTEGRAL PART OF MINISTERIAL STAFF
OF D.C. OFFICE MOHMAND AS BEING SENIOR CLERK AND
HIS OUSTING FROM SENIORITY LIST MEANT FOR
MINSTERIAL STAFF OF D.C MOHMAND OFFICE AS
ILLEGAL AND VOID AND AGAINST THE IMPUGNED
TENTATIVE SENIORITY LIST CIRCULATED VIDE OFFICE
ORDER NO. 12867-68/Acctt DATED: 15-11-2021,
WHEREBY THE APPELLANT HAS NOT BEEN PLACED AT
HIS DUE PLACMENT.**

Respectfully Sheweth.

1. That the Petitioner is a law abiding and *bona-fide* citizen of the
Islamic Republic of Pakistan and hails from a respectable family.
2. That briefly put, Petitioner was appointed as Khass'adar Moharrir
in the office of the erst-while Political Agent Mohmand, dated 18-

11-1996 and later in course, was promoted to the post of Junior Clerk (BPS-11) in 2007 in the said office.

3. That subsequently, upon the recommendations of the Departmental Promotion Committee (DPC) the Petitioner was promoted as Senior Clerk (BPS-14) dated 31-10-2018 *vide* Office Order No. 9007-10/Acctt and was serving at the Respondent Department in continuance until today. The Petitioner has been pulling out all the stops in his twenty-five years of service in the Administration Department, faithfully.
4. That the grievance of the Petitioner is pursuant to Office Order No. 12867-68/Acctt dated 15-11-2021 of the Deputy Commissioner Mohmand Tribal District, where after the merger of FATA into Khyber Pakhtunkhwa a tentative seniority list for the year 2021 of the employees was issued and circulated amongst the ministerial staff of respective Sub-Division and Main office and the same was asked to be returned for rectification in case of any error of omission before 19-11-2021. **(Copy of the Impugned Notification & Impugned seniority list is annexed herewith.)**
5. That after going through the impugned seniority list, the Petitioner was devastated to find out that his seniority had neither been mentioned, nor brought in the list meant for ministerial staff of the concerned D.C Office.
6. That being a vigilant fellow in duty, the Petitioner promptly moved an objection petition to the Respondent Department bearing Diary No. 7883 dated 18-11-2021 informing the concerned authority about the inclusion of his name in the subject list before the due date, but to utter dismay, the Petitioner did not hear any word for a long time so feeling aggrieved the Petitioner filed another representation at Respondent Department *vide* Diary No.8248 dated: 08-12-2021 requesting the same, but here again the deuce fate of the Petitioner prevailed, and nothing came out of the same. **(Copy of the Departmental Appeals are annexed herewith)**

7. That feeling aggrieved and having the only remedy available being Civil Servant, the Appellant approaches this Hon'ble Tribunal for his due placement in Seniority List, upon the following grounds, inter-alia.

GROUNDS:

- A. That there exists no other expedient- cum- expeditious and adequate remedy available elsewhere, hence the instant petition under the extra-ordinary jurisdiction of this August Court.
- B. That the Petitioner is naturally born bona-fide citizen of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land, interpreted, guaranteed, and enforced by the laws and law Courts of the land.
- C. That it is a cherished principle of law that where a law requires a thing to be done in a particular manner, then the same is to be done in that manner and not otherwise.
- D. That the Petitioner has lent his prime youth in the service of the Respondent Department, yet he was robbed off his right to seniority and promotion respectively, which is a sheer violation of fundamental rights.
- E. That the Petitioner has been meted out with flat-out discrimination against his colleagues as the Respondent Department suffers from legal and factual infirmities.
- F. That the Petitioner has been subjected to a service at the Main Office of the Former P.A now D.C Mohmand, and he was smoothly brushed under the carpet after the merger of FATA into Khyber Pakhtunkhwa.

- G. That as seniority is the Legal and fundamental right of every civil servant, meaning thereby that the Respondent Department is the protector and guarantors of the same, but here the Petitioner has been robbed off his due rights.
- H. That the Respondent Department has badly failed in conferring upon the Petitioner, the Principles of policy, as contained in the Constitution, requiring them to secure well-being of the Petitioner, by ensuring equitable adjustment of rights between the Employer - Respondent & Employee - Petitioner.
- I. That the law & law courts of the land have always encouraged and appreciated that rules are to be followed, and have always discouraged, deplored, and depreciated any variation, deviation, or violation of the rules.
- J. That discrimination in any form is highly abominable and *bete-noire* and is always checked down in meritorious manner by the superior courts. Reason behind checking it down and chucking it away is to ensure equality and equal treatment of its citizens and to remove any sense of discrimination.
- K. That under the mandate of Article 4 of the constitution, no one can be treated otherwise than in accordance with law, wherein, Article 25 postulated that alike are to be treated alike, but here the case of the Petitioners is volta-facie and a totally different yardstick has been used to treat the Petitioners.
- L. That from every angle, the Petitioner is entitled to a fixed seniority and is eligible for promotion in the subject post.
- M. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

5

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the Impugned Seniority List dated 08-11-2021, of the office of the D.C Mohmand, may kindly be rectified by inserting the name of the Petitioner and be placed at his due placement in the seniority list of 2021, with consequential back benefits. Any other relief not specifically asked for may also graciously be extended in favor of the petitioner in circumstances of the case.

Dated: 22/03/2022

Appellant

Through

Javed Iqbal Gulbela
Advocate
Supreme Court of Pakistan

Saghir Iqbal Gulbela
&
Ahsan Sardar
Advocates High Court,
Peshawar.

NOTE:

As per information of my client, no such like service appeal for the same appellant, upon the same subject matter has earlier been filed, prior to the instant one.

Advocate.

6

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

In Re S.A _____/2022

Naseer Ahmed

VERSUS

Government of Khyber Pakhtunkhwa & Others

APPLICATION FOR TEMPORARY INJUNCTION

Respectfully Sheweth,

1. That the Appellant is filing the instant Service Appeal, the contents of which may very graciously be considered as part and parcel of the instant application.
2. That prima facie case exists in favor of the Appellant.
3. That Balance of convenience also lies in favor of the Appellant and is quite sanguine of his success.
4. That if status-quo in the instant case is not maintained, the Appellant shall suffer irreparable loss.

It is therefore most humbly prayed that on acceptance of the instant application, the promotion process of ministerial staff may kindly be suspended till the final disposal of the instant service appeal.

Dated: 22-03-2022

Appellant

Through

Javed Iqbal Gulbela

Advocate

Supreme Court of Pakistan

7

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

In S.A No- _____/2022

Naseer Ahmed

VERSUS

D.C Mohmand

AFFIDAVIT

I, Naseer Ahmed S/O Bashir Ahmed, do hereby solemnly affirm and declare on oath that the contents of the instant Service Appeal is correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


DEPONENT

Cell# 0333-9797534

CNIC# 17101-96862959

Identified by:


Javed Iqbal Gulreza
Advocate, Supreme Court of
Pakistan

JAVED IQBAL GULREZA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

In Re S.A _____/2022

Naseer Ahmed

VERSUS

D.C Mohmand

ADDRESSES OF PARTIES

APPELLANT

Naseer Ahmad, Senior Clerk at Deputy Commissioner Office, District Mohmand.

ADDRESSES OF RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa through Secretary Food Department at Civil Secretariat Peshawar.
2. Deputy Commissioner, District Mohmand.
3. Secretary Finance Department, Government of Khyber Pakhtunkhwa at Civil Secretariat Peshawar.

Dated: 22/03/2022

Appellant
Through

Javed Iqbal Gulbela
Advocate
Supreme Court of Pakistan

JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)



OFFICE OF THE
DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT

(9)

Ann "A"



0924-290001-2



0924-290075



pamohmand@gmail.com

No. 12867-68/A/21

Dated 15-11-2021

To All Assistant Commissioners
Tribal District Mohmand

Superintendent
Deputy Commissioner Mohmand Office

Subject: TENTATIVE SENIORITY LIST OF ASSISTANT, SENIOR CLERKS,
JUNIOR CLERKS, MOHARRAR AND CLASS-IV OF THIS OFFICE AS
STOOD ON 15.11.2021

I am directed to refer to the subject noted above and to forward herewith a copy of tentative seniority list of Assistants, Senior Clerks, Junior Clerks, Moharrars and Class-IV as it stood on 15.11.2021. The same may be circulated amongst the ministerial staff working in your respective Sub-Division/ Main Office.

I am further directed to request you to direct all concerned that seniority list may be returned to this office duly signed/ including error/ omission, if any, for purpose rectification along attested supporting documents up to 19.11.2021. In case of no receipt of no-response by the due date, it would be considered that particulars have been accepted as correct.

Awais
Deputy Commissioner
Mohmand Tribal District
Deputy Commissioner
Mohmand Tribal District


15/11/21

JAVED IQBAL
Advocate
Supreme Court
(ASO # 5017)

**TENTATIVE SENIORITY LIST OF SENIOR CLERKS OF THE OFFICE OF DEPUTY
COMMISSIONER MOHMAND TRIBAL DISTRICT (AS IT STOOD ON 30/10/2021)**

| S No | Name of Official | DOMICLE /DATE OF BIRTH | Education Qualification | Date of 1 st entry into service | Date of Promotion against present post | Method of Recruitment | Present post of posting | I have no objection over the seniority list |
|------|-------------------|--------------------------|-------------------------|--|--|-----------------------|-------------------------|---|
| 1 | Mr. Muhammad Sher | Charsadda/ 15.04.1966 | MA | 01.02.1990 | 28.3.2011 | By Promotion | PM Baizai | |
| 2 | Mr. Nisar Ahmad | Mohmand/ 25.03.1975 | FA | 14.04.1993 | 24.5.2013 | -do- | Accountant | |
| 3 | Mr. Amjid Ali | Mohmand/ 18.01.1968 | FA | 15.04.1993 | 31.10.2018 | -do- | AC Lower Office | |
| 4 | Mr. Abdul Wakil | Mohmand/ 08.04.1964 | BA | 01.05.1995 | 31.10.2018 | -do- | Main Office | |
| 5 | Mr. Abdur Rehman | Mohmand/ 24.12.1968 | BA | 15.07.1995 | 31.10.2018 | -do- | Education Clerk | |
| 6 | Mr. Amjid Ali | Mohmand/ 03.01.1981 | BA | 18.08.2010 | 18.8.2010 | -do- | AC Lower Office | |
| 7 | Mr. Zakirullah | Mohmand/ 06.09.1985 | FA | 18.08.2010 | 18.8.2010 | -do- | Mohmand Dam Accountant | |

I have no objection over the seniority list
 Sd/-
 Deputy Commissioner
 Mohmand Tribal District
 08/11/21


 Deputy Commissioner
 Mohmand Tribal District

✓
 08/11/21

Ann "B"

10

**TENTATIVE SENIORITY LIST OF JUNIOR CLERKS OF THE OFFICE OF DEPUTY
COMMISSIONER MOHMAND TRIBAL DISTRICT (AS IT STOOD ON 30/10/2021)**

| S No | Name of Official | Designation Post held (BPS) | Education Qualification | Date of 1 st entry into service | Date of Promotion against present post | Domicile/ Date of birth | Method of Recruitment | I have no objection over the seniority list |
|------|---------------------|-----------------------------|-------------------------|--|--|-------------------------|------------------------|---|
| 1. | Mr.Fazal Khaliq | Junior Clerk (BPS-11) | BA | 18.08.2010 | 18.08.2010 | Mohmand/ 12.04.1986 | By initial recruitment | |
| 2. | Mr.Muhammad Ayaz | Junior Clerk (BPS-11) | BA | 18.01.2011 | 18.01.2011 | Mohmand/ 08.02.1979 | -do- | |
| 3. | Amjad Ali | Junior Clerk (BPS-11) | MA | 18.01.2011 | 18.01.2011 | Mohmand/ 03.04.1981 | -do- | |
| 4. | Mr.Naveed Ahmad Taj | Junior Clerk (BPS-11) | BA LLB | 18.01.2011 | 18.01.2011 | Mohmand/ 09.09.1985 | -do- | |
| 5. | Mr.Rashid Khan | Junior Clerk (BPS-11) | BA | 18.01.2011 | 18.01.2011 | Mohmand/ 22.04.1988 | -do- | |
| 6. | Mr.Zainullah | Junior Clerk (BPS-11) | FA | 18.07.2007 | 28.03.2011 | Mohmand/ 16.03.1974 | By promotion | |
| 7. | Mr.Seyar Ahmad | Junior Clerk (BPS-11) | BA | 05.07.2013 | 05.07.2013 | Mohmand/ 15.07.1982 | By initial recruitment | |
| 8. | Mr.Mohibullah | Junior Clerk (BPS-11) | FA | 01.06.1984 | 31.10.2018 | Mohmand/ 01.01.1966 | By promotion | |
| 9. | Mr.Wasif Khan | Junior Clerk (BPS-11) | SSC | 31.01.2011 | 31.10.2018 | Mohmand/ 14.08.1979 | -do- | |

| | | | | | | | | |
|-----|----------------------|--------------------------|-----|------------|------------|------------------------|---------------------------|--|
| 10. | Mr. Noor Muhammad | Junior Clerk (BPS11) | SSC | 03.06.2002 | 31.10.2018 | Mohmand/ 01.05.1982 | -do- | |
| 11. | Mr. Ihsanullah | Junior Clerk (BPS-11) | MA | 31.01.2011 | 31.10.2018 | Mohmand/ 08.09.1982 | -do- | |
| 12. | Mr. Asghar Ali | Junior Clerk (BPS-11) | BA | 31.10.2018 | 31.10.2018 | Mohmand/ 15.04.1978 | By Initial Recruitment | |
| 13. | Mr. Naseem Shah | Junior Clerk (BPS-11) | BA | 31.10.2018 | 31.10.2018 | Mohmand/ 04.03.1983 | -do- | |

(12)

Javed
Deputy Commissioner
Mohmand Tribal District

28/11/21

JAVED JOBAL (L/35/35)
Deputy Commissioner
Mohmand Tribal District

Our faith, "Corruption free Pakistan"



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD,
PESHAWAR

No. 4912/ET FATA Merged Distt-III
Dated. 08/11/2021

091-9225378 M fooddirectoratkpk@gmail.com @fooddirectorate

OFFICE ORDER

In pursuance to the Government of Khyber Pakhtunkhwa Food Department letter No. SOG/7-46/2020/10243 dated 08-11-2021 and Govt. of Khyber Pakhtunkhwa Finance Department (NMAs) vide No. BO.C-11/3-23/SNE/Food/2021 dated 03-11-2021, wherein the Finance Department agrees to shift 68 Nos. posts (33-posts grant No.49 & 35 Nos. Posts Grant No.61) to newly costs centres under the SAP system grant No.61 for Food Department new merged areas for the current financial year 2021-22 (copy enclosed).

2 To regularize the pay and allowances against the shifted different cadre posts from offices of Food Cell and Director Food (Head Quarter) in 05 Tribal Districts to the 07 newly establishment District Food Controller Offices in Merged Areas as tabulated below, the following postings / transfers of officers/officials are hereby ordered with immediate effect in the public interest.

| S.# | Name of Officer/Official | Nomenclature of with BPS | Post Position code | Personnel No. of the Incumbent | From (Existing PR) | To (PR Transfer to) | |
|-----|--------------------------|---------------------------|--------------------|--------------------------------|---|--|--|
| 1. | Vacant | Senior Clerk | 14 80916509 | | PR 8086 Food Cell Agriculture | | |
| 2. | Vacant | Junior Clerk | 11 80473360 | | TW 4002 Director Food (S.Waziristan) | | |
| 3. | Alamgir Khan | Chowkidar | 3 80473366 | 879098 | TW 4002 Director Food (S.Waziristan) | BJ 4125 District Food Controller Bajaur | |
| 4. | Khalq Noor | Chowkidar | 3 80473367 | 879090 | TW 4002 Director Food (S.Waziristan) | | |
| 5. | Noor Rehman | Chowkidar | 3 80473364 | 878084 | TW 4002 Director Food (S.Waziristan) | | |
| 6. | Hayat Ullah | Chowkidar | 3 80473363 | 879080 | TW 4002 Director Food (S.Waziristan) | | |
| 7. | Vacant | Chowkidar | 3 80473368 | | TW 4002 Director Food (S.Waziristan) | | |
| 8. | Usman Anmad Saeed | Assistant Food Controller | 8 80892128 | 50411702 | KH 4034 Food Cell Khyber | | KH 4125 District Food Controller Khyber |
| 9. | Jamshed Ali Khan | Chowkidar | 3 80892131 | 511188 | KH 4034 Food Cell Khyber | | |
| 10. | Farman Ali | Chowkidar | 3 80892129 | 511182 | KH 4034 Food Cell Khyber | | |
| 11. | Abdur Raziq Khan | Chowkidar | 3 80892130 | 511185 | KH 4034 Food Cell Khyber | | |
| 12. | Vacant | Senior Clerk | 14 80892132 | | KH 4034 Food Cell Khyber | | |
| 13. | Salman | Food Grain Supervisor | 7 80357181 | 914442 | PR 4454 Director Food (Khyber) | | |
| 14. | Vacant | Junior Clerk | 11 80258265 | | MW 4002 Director Food (N.Waziristan) | | |
| 15. | Mastan Ali | Chowkidar | 3 80078721 | 673768 | KM 4002 Director Food (Kurram) | | |
| 16. | Yaqoob Hussain | Chowkidar | 3 80078719 | 673751 | KM 4002 Director Food (Kurram) | | |

Office Order for transfer of posts of Food Cell to Merged Districts dated 10-11-2021

<https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox?projector=1>

JAVED IQBAL
Advocate
Supreme Court of Pakistan
(ASS# 277)

| | | | | | | | |
|----|-----------------------|------------------------------|----|----------|----------|--|--|
| 51 | Vacant | Junior Clerk | 11 | 80473361 | | TW 4002 Director Food (S.Waziristan) | OI 4125 District Food Controller Orakzai |
| | Vacant | Food Grain Inspector | 9 | 80442463 | | MW 4002 Director Food (N.Waziristan) | |
| 53 | Said Ahmad Khan | Chowkidar | 3 | 80258269 | 734657 | MWV 4002 Director Food (N.Waziristan) | |
| 54 | Muhammad Azimullah | Chowkidar | 3 | 80258268 | 734656 | MW 4002 Director Food (N.Waziristan) | |
| 55 | Din Sahib | Chowkidar | 3 | 80258267 | 734654 | MW 4002 Director Food (N.Waziristan) | TW 4125 District Food Controller South Waziristan |
| 56 | Zahid Noor | Chowkidar | 3 | 80925287 | 50153111 | TW 4038 Food Cell S.Waziristan | |
| 57 | Muhammad Amir | Assistant Food Controller | 8 | 80925286 | 50306884 | TW 4038 Food Cell S.Waziristan | |
| 58 | Kiramattullah | Chowkidar | 3 | 80925288 | 50153112 | TW 4038 Food Cell S.Waziristan | |
| 59 | Rafiq Khan | Chowkidar | 3 | 80925289 | 50173313 | TW 4038 Food Cell S.Waziristan | |
| 60 | Noor Muhammad | Junior Clerk | 11 | 80925290 | 50153113 | TW 4038 Food Cell S.Waziristan | |
| 61 | Vacant | Assistant | 16 | 80607543 | | TW 4002 Director Food (S.Waziristan) | |
| 62 | Noor Salam | Chowkidar | 3 | 80473365 | 879106 | TW 4002 Director Food (S.Waziristan) | |
| 63 | Vacant | Chowkidar | 3 | 80194241 | | MG 4004 Director Food Mohmand | |
| 64 | Vacant | Senior Clerk | 14 | 80456822 | | PR 4454 Director Food Khyber | |
| 65 | Javed Khan | Driver | 7 | 80916507 | 104531 | PR 8086 Food Cell Agriculture | PR 4450 Director Food (Head Office) |
| 66 | Atta Ur Rehman | Naib Qasid | 3 | 80976234 | 465958 | PR 8086 Food Cell Agriculture | |

**DIRECTOR FOOD
KHYBER PAKHTUNKHWA
PESHAWAR.**

Endorsement No & Dates Even

Copy for information to:-

1. The Accountant General, Khyber Pakhtunkhwa.
2. The Deputy Commissioners, Bajaur, Mohmand, Khyber, Kurram, Orakzai, North Waziristan & South Waziristan.
3. The District Accounts Officers, Bajaur, Mohmand, Khyber, Kurram, Orakzai, North Waziristan & South Waziristan.
4. All Officers/Officials in Directorate of Food Khyber Pakhtunkhwa Peshawar.
5. The Section Officer General Govt. of Khyber Pakhtunkhwa Food Department Peshawar with request to issued Notification for transfer of posts of Assistant Director Food (BS-17) and Assistant Accounts Officers (BS-17) and also take up the case with Finance Department for change of nomenclature of the post of Assistant Accounts Officer as Accounts Officer (BS-17) as mentioned in his letter noted above.
6. The Assistant Directors Food, Malakand, Peshawar, Kohat, Bannu & D.I.Khan.
7. All District Food Controllers in Khyber Pakhtunkhwa.
8. The S&EOs PRC Peshawar and NRC Azakhel.
9. The Rationing Controller Peshawar.
10. PS to Minister Food Khyber Pakhtunkhwa.
11. PS to Secretary Food Khyber Pakhtunkhwa
12. Officials Concerned/ Personal File.

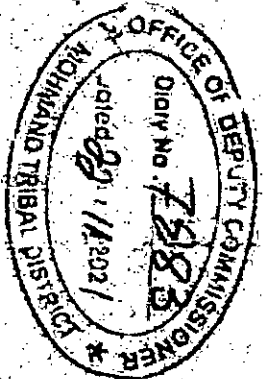
**DIRECTOR FOOD
KHYBER PAKHTUNKHWA
PESHAWAR.**

Subject: **MEMORANDUM**

MEMORANDUM FOR THE RECORD
MEMORANDUM FOR THE RECORD
MEMORANDUM FOR THE RECORD

It is submitted that I have appointed as Khassadar Mohamud on 18 November, 1996 in the office of Political Agent Mohamud, later on I had promoted from Khassadar Mohamud to Senior Clerk in 2007 and in 2018 on the recommendation of Departmental Promotion Committee (DPC) I had promoted as Senior Clerk (PPS-1A). I am performing my duties from 1996 in Administration Department but now after merger to FATA into KP in newly seniority list 2021 prepared by Account branch my name is not included with the reason not known.

It is therefore, requested that the concerned branch may kindly be directed to include my name in the seniority list as per rules/policy if any please.



Mr. Naseer Ahmad
Senior Clerk
18-11-2021

Acct. Officer
For data pl.
Mohamud
DCM
29/11/21

JAVED ICBA
Supreme Court of Pakistan
145C/2021

(17)

"Ann E"

To: Deputy Commissioner
Mohmand Tribal District

Subject: APPLICATION FOR INCLUDING IN NEWLY PERPARED SENIORITY LIST

R/SIR:

With due respect I invite you kind attention to my earlier application vide Diary No.7883 Dated 18-11-2021 on the subject above and to further bring the following detail about my seniority position in my parent office i-e former P.A mohmand now D.C mohmand

- 1) That I was appointed as khasdar Moharrir in the office former P.A mohmand on 18-11-1996.
- 2) That on during 2007, I was promoted as junior clerk in the said office former P.A mohmand.
- 3) That during 31-10-2018, I along with other clerks promoted as senaril clerk
- 4) That I since my appointment till date was as permanent employe of the former P.A Now D.C and regularly paid my saleries form regular budget.
- 5) That I render 25 years service under the kind establishment of P.A DC and I stud that how my Name was exlude form the tentative seniorit list.
- 6) In view of the above your kind is requested that my Name kindly be in placed at serial No 6 of the seniority list as stood on 20-10-2021.

ADC Q,
Pl. look into it

Shams
DC MID
7.12.21

Accountant
Please Speed
Mukim Ahmad
07-12-21

Naseer
Mr. Naseer Ahmad
Senior Clerk
07/12/2021

JAVED IQBAL
Advocate
Supreme Court
AS

OFFICE OF DEPUTY COMMISSIONER
D.C. No. 2048
8-12-21
MOHMAND TRIBAL DISTRICT



(18) Annⁿ F

**DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT**

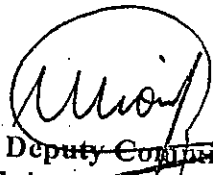
Phone No. 0924-290001 Fax No. 0924-290075 Email: pamohmand@gmail.com

Dated Ghallanai the 31/10/2018.

ORDER

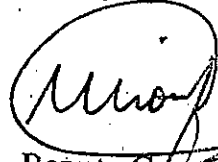
As recommended by Departmental Promotion Committee in its meeting held at Ghallanai on 29th October, 2018, the following Junior Clerks (BPS-11 (12570-880-38970) are hereby promoted to the post of Senior Clerks (BPS-14) (15180-1170-50280)) with immediate effect as per details given against each:-

1. Mr. Amjad Ali son of Haroon Rashid..
2. Mr. Abdul Wakeel son of Khaista Rehman.
3. Mr. Meraj Muhammad Khan son of Muhammad Ghulam.
4. Mr. Abdur Rehman son of Muhammad Akram.
5. Mr. Naseer Ahmad son of Bashir Ahmad.
6. Mr. Shams ur Rehman son of Haji Abdul Manan.


Deputy Commissioner
Mohmand Tribal District

No. 9007-10 /Acctt:

1. Secretary, AI&C Department, FATA Secretariat, Peshawar.
2. Assistant Commissioner, Lower Mohmand Tribal District Ekkaghund.
3. Agency Accounts Officer, Mohmand Tribal District, Ghallanai.
4. Officials Concerned.


Deputy Commissioner
Mohmand Tribal District

JAVED IQBAL GUL
Advocate
Supreme Court of Pakistan
(ASC # 317)



DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT

Phone No. 0924-290001 Fax No. 0924-290075 Email: panohmand@gmail.com

(19)

Amir
2

No. 6892 /Acctt:
Dated 16 /01/2109.

To: Assistant to Commissioner (Rev/A),
Peshawar Division Peshawar.

Subject: PROVISION OF JOINT SENIORITY LIST OF SENIOR CLERKS (BPS-14) AND
JUNIOR SCALE STENOGRAPHER BPS-14)

Memorandum:-

Kindly refer to your memo No. 5/4/EA/11/418-19 dated 9.1.2019 on the subject
noted above.

The seniority list of Senior Clerks of this office is attached herewith as desired
please.

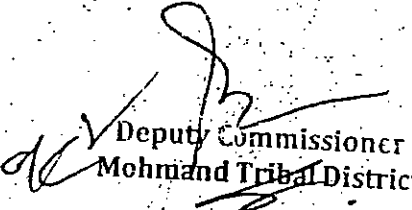
o/c
Deputy Commissioner
Mohmand Tribal District

JAVED IQBAL GUL
Advocate
Supreme Court of Pakistan
(ASC # 3317)

LIST OF SENIOR CLERKS DC MOHMAND OFFICE.

| S No | Name of Official | DOMICLE /DATE OF BIRTH | Education Qualification | Date of 1 st entry into service | Date of Promotion against present post | Method of Recruitment | Present post of posting |
|------|--------------------|-------------------------|-------------------------|--|--|-----------------------|-------------------------|
| 1 | Mr.Ihsanudin | Mohmand/ 10.1.1964 | FA | 1.3.1982 | 27.11.2007 | By promotion | PM Khwezai |
| 2 | Mr. Muhammad Sher | Charsadda/ 15.4.1966 | MA | 12.1990 | 28.3.2011 | -do- | PM Baizai |
| 3 | Mr.Nisar Ahmad | 25.3.1975 | FA | 14.4.1993 | 24.5.2013 | -do- | Accountant |
| 4 | Mr.Amjid Ali | Mohmand/ 18.1.1968 | FA | 15.4.1993 | 31.10.2018 | -do- | Passport Clerk |
| 5 | Mr.Abdul Wakil | Mohmand/ 8.4.1964 | BA | 1.5.1995 | 31.10.2018 | -do- | Main Office |
| 6 | Mr.Miraj Muhammad | Mohmand/ 21.3.1977 | FA | 12.12.2005 | 31.10.2018 | -do- | Main Office |
| 7 | Mr.Abdur Rehman | Mohmand/ 24.12.1968 | BA | 15.7.1995 | 31.10.2018 | -do- | Levy Clerk |
| 8 | Mr.Naseer Ahmad | Mohmand/ 11.2.1974 | SSC | 18.11.1996 | 31.10.2018 | -do- | Main Office |
| 9 | Mr.Shams-ur-Rehman | Mohmand/ 2.2.1971 | MSC | 27.12.2003 | 31.10.2018 | -do- | Benevolent Fund Clerk |

JAVED IQBAL GILANI
Advocate
Supreme Court, Pakistan
(ASC-5377)


 Deputy Commissioner
 Mohmand Tribal District

(2)



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT (NMAs)

Finance Department Civil Secretariat Peshawar

<http://www.finance.gkp>

[facebook.com/GoKPFD](https://www.facebook.com/GoKPFD)

twitter.com/GoKPFD

No.BO.C-II/3-28/SNE/Food/2021

Dated: 03.11.2021

Secretary to Govt. of Khyber Pakhtunkhwa,
Food Department,
Peshawar.

Subject:- TRANSFER OF DIFFERENT CADRE POSTS FROM OFFICES OF
FOOD CELL & DIRECTOR FOOD (HEAD QUARTER) IN 05-TRIBAL
DISTRICTS TO THE 07 NEWLY ESTABLISHMENT DISTRICT FOOD
CONTROLLER OFFICES IN MERGED AREAS.

Dear sir,

I am directed to refer to your letter No. SOG/Food/7-46/2019/9963 dated 21.09.2021, on the subject noted above and to state that Finance Department agrees to shift 68-posts (33-posts Grant No.49 & 35-posts Grant No. 61) to newly cost center under the SAP System Grant No.61 for Food Department (NMAs) for the current financial year 2021-22 (copy enclosed).

Your's faithfully

(Wasim Aslam)

Budget Officer (NMD-II)

Copy forwarded to:

1. PS to Special Secretary Finance-I.
2. Master File.

Budget Officer (NMD-II)

JAVED IQBAL GILL
Supreme Court of Peshawar
(ASC # 8311)

FILLED POSTS

11/4/25

22

| EMPLOYEE NAME | POSITION | DESCRIPTION | EPS | OP/FILL | TOTAL |
|---------------|----------|---------------------------|-----|---------|-------|
| | DFC | office Mohmand. | | | 15 |
| | 81108774 | DISTRICT FOOD CONTROLLER | 17 | OPEN | 1 |
| | 81108772 | ASSISTANT FOOD CONTROLLER | 16 | OPEN | 1 |
| | 81108773 | COMPUTER OPERATOR | 16 | OPEN | 1 |
| 567691 | 80194240 | SENIOR CLERK | 14 | OPEN | 1 |
| | 80905911 | JUNIOR CLERK | 11 | FILLED | 1 |
| | 81108775 | FOOD GRAIN INSPECTOR | 09 | OPEN | 1 |
| 981734 | 80905907 | ASSISTANT FOOD CONTROLLER | 08 | OPEN | 1 |
| 349098 | 81108801 | FOOD GRAIN SUPERVISOR | 07 | FILLED | 1 |
| 356314 | 80194242 | CHOWKIDAR | 03 | FILLED | 1 |
| 572992 | 80194243 | CHOWKIDAR | 03 | FILLED | 1 |
| 1202538 | 80905908 | CHOWKIDAR | 03 | FILLED | 1 |
| | 80905909 | CHOWKIDAR | 03 | FILLED | 1 |
| | 80905910 | CHOWKIDAR | 03 | FILLED | 1 |
| | 81108802 | NAIB QASID | 03 | OPEN | 1 |
| | 81108803 | SWEEPER | 03 | OPEN | 1 |

PREPARED BY : CGA FABS CC ISLAMABAD

SUPERVISOR
 (SIGNED)
 JAVED ICHAK

(23)
Am-T

Accounts Office GHALANAI

PAYROLL REGISTER
1

Page :

month of December ,2021
12.01.2022

For the
Date :

DDO : MG4004 Political Agent Mohmand (Provincial)
001 Payroll 1

Payroll Section :

00106449 NASEER AHMAD CNIC: 0014291086226 Desig: SENIOR CLERK
(80902920) Grade: 14 NTN: Buckle No.:

Gazetted/Non-Gazetted: N

| P A Y M E N T S | | A M O U N T | D E D U C T I O N S | | A |
|-----------------|-----------|-------------|---------------------|--------|---|
| M O U N T | LOAN/FUND | | PRINCIPAL | REPAID | |

| | | | | | |
|---------------------------|--|-----------|----------------------------|----------|--|
| 0001 Basic Pay | | 32,730.00 | 3014 GPF Subscription | | |
| 2,620.00- | | | GPF#: | | |
| 29,811.00 | | | | | |
| 1001 House Rent Allowance | | 3,321.00 | 3530 Police wel:Fud BS-1 t | | |
| 655.00- | | | INCOME TAX 8,621.16 | 3,048.00 | |
| 5,574.12 | | | | | |
| 1210 Convey Allowance 20 | | 2,856.00 | 3907 Police (ROP) | | |
| 10,000.00- | | | | | |
| 1300 Medical Allowance | | 1,500.00 | 4004 R. Benefits & Death C | | |
| 600.00- | | | | | |
| 1528 Unattractive Area A | | 1,000.00 | 3609 Income Tax | | |
| 930.00- | | | | | |
| 2148 15% Adhoc Relief All | | 537.00 | | | |
| 2211 Adhoc Relief All 201 | | 1,865.00 | | | |
| 2224 Adhoc Relief All 201 | | 3,273.00 | | | |
| 2247 Adhoc Relief All 201 | | 3,273.00 | | | |
| 2264 Adhoc Relief All 201 | | 3,273.00 | | | |
| 2309 Adhoc Relief All 202 | | 3,273.00 | | | |
| 2315 Special Allowance 20 | | 3,500.00 | | | |

PAYMENTS
14,805.00-
31.12.2021

60,401.00
NET PAY

DEDUCTIONS
45,596.00 01.12.2021

Branch Code:221401 SHABQADAR, CHARSADEA.
SHABQADAR, CHARSADEA. CHARSADDA
7991860003

HABIB BANK LIMITED
Accnt.No:

124

00349098 MOHAMMAD ISHAQ
(80194242) Grade: 04 NTN:
Gazetted/Non-Gazetted: N

CNIC: 0730156040485
Buckle No.:

Desig: CHOWKIDAR

| P A Y M E N T S | | A M O U N T | D E D U C T I O N S | | A |
|-----------------|-----------|-------------|---------------------|--------|---|
| M O U N T | LOAN/FUND | | PRINCIPAL | REPAID | |

| | | | | | |
|---------------------------|--|-----------|----------------------------|----------------|--|
| 0001 Basic Pay | | 15,620.00 | 3004 GPF Subscription | | |
| 830.00- | | | GPF#: | IV.PA.MND.4840 | |
| 27,355.00 | | | | | |
| 1001 House Rent Allowance | | 2,187.00 | 3501 Benevolent Fund | | |
| 600.00- | | | | | |
| 1210 Convey Allowance 20 | | 1,785.00 | 4004 R. Benefits & Death C | | |
| 300.00- | | | | | |
| 1300 Medical Allowance | | 1,500.00 | | | |
| 1528 Unattractive Area A | | 1,000.00 | | | |
| 2148 15% Adhoc Relief All | | 313.00 | | | |
| 2199 Adhoc Relief Allow @ | | 221.00 | | | |
| 2211 Adhoc Relief All 201 | | 1,124.00 | | | |
| 2224 Adhoc Relief All 201 | | 1,562.00 | | | |
| 2247 Adhoc Relief All 201 | | 1,562.00 | | | |
| 2264 Adhoc Relief All 201 | | 1,562.00 | | | |
| 2309 Adhoc Relief All 202 | | 1,562.00 | | | |
| 2311 Dress Allowance - 20 | | 1,000.00 | | | |
| 2312 Washing Allowance 20 | | 1,000.00 | | | |
| 2313 Integrated Allowance | | 600.00 | | | |

| | | | |
|--------------------|-----------|---------------------|------------|
| PAYMENTS | 32,598.00 | DEDUCTIONS | |
| 1,730.00- | NET PAY | 30,868.00 | 01.12.2021 |
| 31.12.2021 | | | |
| Branch Code:211384 | GHALANAI | UNITED BANK LIMITED | |
| GHALANAI | | Accnt.No: 1987-4 | |

00356314 ALI HAIDAR
(80194243) Grade: 04 NTN:
Gazetted/Non-Gazetted: N

CNIC: 1710163390463
Buckle No.:

Desig: CHOWKIDAR

| P A Y M E N T S | | A M O U N T | D E D U C T I O N S | | A |
|-----------------|-----------|-------------|---------------------|--------|---|
| M O U N T | LOAN/FUND | | PRINCIPAL | REPAID | |

JAVED IQBAL
Asst. Secy
Supreme Court
(ASO # 837)

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

SB

No.

APPEAL No. 417 of 2022.

Mascer Ahmad

Appellant/Petitioner

Versus

Govt of KPK through Secy Food Department at Civil Secretariat

RESPONDENT(S)

Notice to Appellant/Petitioner Counsel Javed Iqbal Gulbela Advocate
Supreme Court of Pakistan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/05/2022 at 9:00

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Noted
14/4/22
Tamara Khan

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Recd

SB

APPEAL No. *417* of 20*22*.

Naseer Ahmad

Appellant/Petitioner

Versus

Govt of KPK through Secy Food Deptt: at Civil Secretariat

RESPONDENT(S)

Notice to Appellant/Petitioner

*Naseer Ahmad, Senior Clerk at
Deputy Commissioner Office, District Mohmand*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *13/05/2022* at *9:00*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 417 of 2022 SB

..... Naseer Ahmad Appellant/Petitioner
Versus

through Secy Food depart at civil secretariat Peshawar
Respondent No. (3)

Notice to: Secy Finance depart Govt of KPk at civil secretariat Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 20/07/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this..... 1st

Day of..... July 2022

For Reply

[Signature]

**Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**




Note: 1. The hours of attendance in the court are the same to that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 417/2022 _____

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 24/03/2022 | <p>The appeal of Mr. Naseer Ahmad presented today by Mr. Javed Iqbal Gulbela Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> |
| 2- | | <p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>13-05-2022</u> <i>NOTICES be ISSUED to the appellant and his counsel for the date fixed</i></p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: center;"></p> |

13.05 2022

Learned counsel for the appellant present.

Let pre-admission notices be issued to the respondents for submission of reply/comments before S.B on 20.07.2022.



(Kalim Arshad Khan)
Chairman