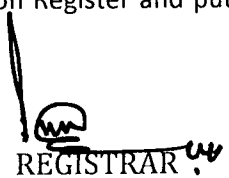




Form- A

FORM OF ORDER SHEET

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

Case No.- 894 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/06/2022	<p>The appeal of Mr. Muhammad Imran resubmitted today by Mr. Asif Ali Shah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	15.6.22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>27-6-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	27.06.2022	<p>Learned Member (Executive), is on leave. Therefore, the case is adjourned to 12.08.2022 for the same as before.</p> <p> READER</p>


*Noted  
for counsel  
16-6-22*

The appeal of Mr. Muhammad Imran son of Shah-e-Room Bacha Naib Qasid District Revenue Office District Mohmand received today i.e. on 30.05.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of order dated 25.01.2022 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.

No. 1200 /S.T,

Dt. 31/5 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Asif Ali Shah Adv. Pesh.

Respected Sir,  
All objections are hereby removed. This appeal may kindly be fixed earlier.



06-06-2022

**BEFORE THE SERVICE TRIBUNAL K.P.K.  
PESHAWAR.**

Service Appeal No. 894 /2022

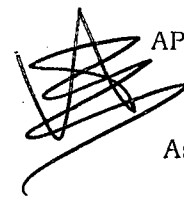
Muhammad Imran.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

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S.No.	Particulars	Annexure	P.No
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5	Seniority List dated:08.11.2021	B	9-11
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7	Impugned DPC promotion order 26.1/22	D	15
8	Copy of departmental appeal	E	16
9	Wakalathnama		17



APPELLANT

Through

Asif Ali Shah, ASC

&

Syed Bilal Bacha

Advocate High Court,



Dated:01.06.2022

Chamber#3-A, Haroon Mansion Khyber Bazzar, Peshawar.  
Contact Mobile: 0333-9006806, 0301-8333888

①

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

APPEAL No. \_\_\_\_\_/2022

**Muhammad Imran** S/O Shah-e-Room Bacha, Naib  
Qasid, District Revenue Office, District Mahmand.

..... **Appellant**

**Versus**

1. **The Government of Khyber Pakhtunkhwa**,  
through Secretary Board of Revenue Government  
of Khyber Pakhtunkhwa, Civil Secretariat  
Peshawar.
2. **The Senior Member Board of Revenue**, of  
Khyber Pakhtunkhwa,  
Civil Secretariat, Peshawar.
3. **Commissioner** Peshawar Division, Peshawar.
4. **Deputy Commissioner**, Mohmand District  
Mohmand.
5. **Maqsood Khan** (Survey Helper Finance  
Department, District Mohmand.
6. **Waqar-ul-Hassan**, Naib Qasid, Additional Deputy  
Commissioner, District Mohmand.

.....**Respondents**

**APPEAL UNDER SECTION-4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974**  
**AGAINST THE IMPUGNED PROMOTION**  
**ORDERS DATED: 26-01-2022 AND THE NOT**  
**DECIDING THE APPEAL OF THE APPELLANT IN**  
**STATUTORY PERIOD OF 90 DAYS**

**Prayer:**

IT IS, THEREFORE, HUMBLY PRAYED THAT  
ON ACCEPTANCE OF THIS APPEAL THE  
IMPUGNED SENIORITY LIST DATED:

31.12.2021 AND IMPUGNED ORDER OF RESPONDENT NO.3 DATED: 26.01.2022 WHEREBY THE RESPONDENTS NO.5 & 6 HAS BEEN PROMOTED AGAINST THE SENIORITY, LAW & RULES, MAY KINDLY BE SET ASIDE AND THE RESPONDENTS MAY KINDLY BE DIRECTED TO FOLLOW THE SENIORITY AS PER LAW & RULES IN ITS TRUE LETTER AND SPIRIT AND CONVENE DPC MEETING FOR PROMOTION OF APPELLANT FROM DATE OF HIS ELIGIBILITY AND TO ISSUE THE PROMOTION ORDER OF THE APPELLANT WITH ALL BACK BENEFITS.

FURTHER ALL ACTS DONE FOR CONSIDERING THE INELIGIBLE / BLUE EYED FOR PROMOTION MAY KINDLY BE DECLARED AGAINST THE POLICY, VOID ABINITIO BEING AGAINST THE FUNDAMENTAL RIGHTS GRANTED UNDER THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN.

**RESPECTFULLY SUBMITTED:**

The appellatant most humbly beg to submit as under:

1. **That** the Appellant is a law-abiding citizen of Pakistan and also hails from a respectable family. He is a civil servant who was appointed as a process server BPS-2 vide Notification dated: 22.12.2008. (Copy of appointment order is Annex-A)
2. **That** the Appellant remained posted at the same post in the office of Deputy Commissioner office, Mohmand, and till date he is serving.
3. **That** from the office of the respondent No.4 seniority lists dated:08.11.2021 were issued and in Class-IV category the appellatant is the most senior literate class-IV employee. (Seniority list is attached as annexure-B)
4. **That** all of sudden the respondent No.4 issued another seniority list dated: 31.12.2021 and some other junior employees / blue eyed has been placed senior in the seniority list and on the bases of that impugned seniority list the junior employees were promoted to next higher post i.e Junior Clerk vide impugned

3

promotion order dated:26.01.2022 and the appellant has been intentionally ignored and by this way his fundamental / constitutional rights has been infringed. **(Copy of seniority list dated:31.12.2022 & impugned Promotion Order dated:26.01.2022 are attached as annexure-C & D)**

5. **That** being aggrieved and dissatisfied from the impugned acts & inactions of the respondent No.4 the appellant filed a department appeal before worthy Respondent No.3 on 11.02.2022 but the respondent No.3 did not consider / decide the appeal / representation of the appellant and the statutory period has been elapsed. **(Copy of Departmental appeal is attached as annexure-E)**
6. That aggrieved of the said impugned seniority and promotion order dated:26.01.2022, the appellant has no alternate remedy but to approach this Honorable Tribunal amongst others on the following grounds:

**Grounds:**

- a. **Because** the seniority list & promotion order is based in malafide and is inherently illegal, unlawful and without jurisdiction on the score of the ill-will involved in the orders and is thus liable to be set-aside.
- b. **Because** the Appellant have excellent service record which clearly shows that the Appellant has been performed his service regularly and during the said period his moral character was too excellent, hence, pushing to bottom in seniority list and not considering in DPC for the promotion by the Respondents is a great discrimination and against the rules and regulation.
- c. **Because** the Appellant is the most senior in his colleagues and according to rules and procedures he is entitle for promotion, but the acts of respondents not considering in the DPC meeting dated:26.01.2022 and considering the Respondent No.5 & 6 for promotion being lacks length of service and qualification in specific fields like Appellant, are illegal and unlawful, which has fallen the Appellant as well as his family in a great mental crises, so needs interference of this Hon'ble Tribunal and the impugned promotion order merits reversal.

(4)

- d. **Because** this conduct of the Respondents has not only enhanced the agonies of the Appellant, but it is also an example of misconduct, inefficiency, negligence, and mismanagement on the part of the Respondents No. 1 to 5 which needs to be judicially handled and curbed, in order to save the poor masses and provide them an opportunity to lead their lives freely and with the enjoyment of all of their fundamental rights, which are provided for them in the Constitution of Islamic Republic of Pakistan 1973.
- e. **Because** unless and until the proper Orders / direction of appellant's promotion are not issued, serious miscarriage of justice would be caused to the Appellant and the appellant would be suffered by the Orders of the Respondents which are fanciful, suffering from patent perversity and material irregularity, needs correction from this Hon'ble Court.
- f. **Because** the Respondents erroneously exercised their discretion against judicial principle and not considered the Appellant for promotion against the post and considered the Respondent No.5&6 for promotion against the norms of justice.
- g. **Because** the actions on part of the respondents seriously are in the negation of the Constitution of the Islamic Republic of Pakistan, 1973 and the Civil Servants Act.
- h. **Because** before taking the impugned action, no due process of law has been adopted by the Respondents.
- i. **Because** the Fundamental Rights of the Appellant have been violated in relation to Article 4, 8, 9, 18 & 25 of the Constitution of the Islamic Republic of Pakistan, 1973. The said rights flow out of the Constitution the terms and conditions of service of the Appellant and this Honorable Court being the custodian of the Fundamental Rights of citizens of Pakistan, as well as the protection afforded by the Constitution of Islamic Republic of Pakistan 1973, is why the Appellant seeks the redress of their grievances and to end the ordeal the Appellant is going through due to the illegal, unlawful and unjust acts and inaction of the Respondents.
- j. **Because** the actions and inactions of the Respondents proclaim their own mala fide.
- k. **Because** the Appellant has got the fundamental right of being treated in accordance with law but the treatment meted out to the Appellant is on consideration other than legal and he has been deprived of his rights duly guaranteed to him by the constitution of Pakistan.

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- l. **Because** the Respondents cannot be allowed under the law to pass any illegal order.
- m. **Because** the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the Law are badly violated.
- n. **Because** the Appellant crave for leave to add further grounds at the time of his oral arguments before this Hon'ble Tribunal highlighting further contraventions of the provisions of the Constitution & Laws which adversely affected the Appellant.

**IT IS, THEREFORE, PRAYED THAT IN VIEW OF THE ABOVE SUBMISSIONS THE INSTANT APPEAL MAY GRACIOUSLY BE ACCEPTED AS PRAYED FOR HEREIN ABOVE.**

APPELLANT  
Through  
Asif Ali Shah, ASC  
&  
Syed Bilal Bacha  
Advocate High Court,




Dated:01.06.2022

**VERIFICATION:**

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Advocate



**Note:**

That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

Advocate





6

**BEFORE THE SERVICE TRIBUNAL K.P.K.**  
**PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2022

Muhammad Imran.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

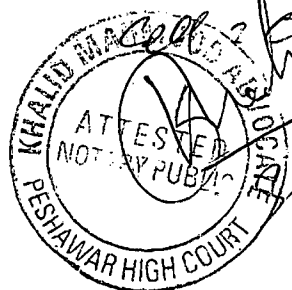
**Affidavit**

It is hereby solemnly affirm and declare on oath that all the contents of the instant appeal are true and correct to the best of my Knowledge and belief and nothing has been concealed intentionally from this Honourable Court.



**Deponent**

CNTC = 21404-7744772-5



20343-9677116  
5-22

(7)

**BEFORE THE SERVICE TRIBUNAL K.P.K.**  
**PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2022

Muhammad Imran.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

**Muhammad Imran** S/O Shah-e-Room Bacha, Naib Qasid, District Revenue Office, District Mahmand.

**RESPONDENTS:**

1. **The Government of Khyber Pakhtunkhwa**, through Secretary Board of Revenue Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. **The Senior Member Board of Revenue**, of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. **Commissioner** Peshawar Division, Peshawar.
4. **Deputy Commissioner**, Mohmand District Mohmand.
5. **Maqsood Khan** (Survey Helper Finance Department, District Mohmand.
6. **Waqar-ul-Hassan**, Naib Qasid, Additional Deputy Commissioner, District Mohmand.

APPELLANT  
Through

Asif Ali Shah, ASC  
&  
Syed Bilal Bacha  
Advocate High Court,

Dated:01.06.2022

8

Annex -

OFFICE OF THE POLITICAL AGENT MOHMANDS GHALLANAI

OFFICE ORDER

Mr. Imran Khan son of Shah Room Bacha Laman Utmankhel is hereby appointed as Naib Qasid BFS-2 with usual allowances as admissible under the rules subject to the production of age and medical fitness certificate by the Agency Surgeon Mohmand Agency against the vacant post.

The appointment is purely made on temporary basis and liable to termination at any time without any notice. However, in case he wishes to resign, he shall have to give one month notice or forfeit one month pay in lieu thereof.

Political Agent Mohmands,  
Ghallaanai.

No 9102 - 5 / Acctt.

Dated Ghallaanai, the 22 / 12 / 2003

Copy forwarded to:

- 1-The Asstt: Political Agent Upper Mohmands.
- 2-The Agency Surgeon Mohmands, Ghallaanai.
- 3-The Agency Accounts Officer at Ghallaanai.
- 4-Official concerned.

Political Agent Mohmands,  
Ghallaanai.

*Attested*  
*[Signature]*

**ATTESTED**

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Annex - B

**JOINED SENIORITY LIST OF CLASS-IV OF THE OFFICE OF DEPUTY COMMISSIONER MOHMAND TRIBAL DISTRICT (AS IT STOOD IN OCTOBER, 2021)**

S. No	Name of Official	Father Name	CNIC	DOMICILE/ DOR	Designation (Post held (BPS))	Educational Qualification	Date of Appointment	Date of Passing Metric Exam:	Place of Posting	I have No objection over the seniority list
	Roshan Khan	Hashim Khan	21406-0397348-7	Mohmand 1971	Mali (BPS-1)	Nil	01.11.1987	Nil	DC House	
	Muhammad Gul	Hamesh Khan	0013960207143	Mohmand/ 01.07.1963	Naib Qasid (BPS-1)	Nil	01.02.1990	Nil	Main Office	
	Abdul Muhammad	Sher Muhammad	0014293098585	Mohmand/ 01.01.1967	Khakrob (BPS-04)	Nil	01.03.1992	Nil	Tehsil Prang Ghar	
	Rekham Gul	Rehmat Gul	2140292267269	Mohmand/ 01.01.1968	Naib Qasid (BPS-04)	Nil	14.05.2002	Nil	DC Office	8
5	Adnan Khan	Usman Khan	14286176011	Mohmand/ 1986	Naib Qasid (BPS-04)	Nil	01.01.2005	Nil	DC Main Office	
6	Haji Muhammad	Sher Muhammad	21407-5814982-5	Mohmand/ 01.01.1980	Naib Qasid (BPS-04)	Nil	30.04.2007	Nil	Tehsil Prang Ghar	
7	Khitab Gul	Sanobar Khan	2140661908791	Mohmand/	Chowkidar (BPS-03)	Nil	01.10.2007	Nil	DC Office	

*attested*  
**TESTED**

(10)

	Ajmir Khan	Zulam Khan	2140639908403	01.01.1975	Mohmand/ 01.01.1982	Behishti BPS-03	Nil	01.10.2007	Nil	DC House	
9	Naseeb Khan	Zait Ullah	2140712293249		Mohmand/	Khakrob (BPS-03)	Nil	01.10.2007	Nil	AC Upper Office	
10	Mohammad Roz	Amroz Khan	21402-1450528-9		Mohmand/ 01.01.1977	Naib Qasid (BPS-03)	Nil	22.12.2008	Nil	DC Office	
11	Muhammad Imran	Shah Room Bacha	21407-7744772-5		Mohmand/ 13-03-1990	Naib Qasid (BPS 03)	Matric	22-12-2008	2020	DC Office	
12	Khalid Khan	Sadam Khan	21407-6121896-9		Mohmand/ 20.4.1994	Process Server (BPS-3)	Matric	10.8.2009	2012	AC Lower Mohmand Office	
13	Waheed Gul	Khanzad Gul	21407-3984748-5		Mohmand/ 09.09.1983	Behishti (BPS-03)	Matric	01.10.2009	1999	AC Lower Mohmand Office	
14	Waqar-ul-Hassan	Saida Gul	17301-5777460-7		Mohmand/ 18.11.1973	Naib Qasid (BPS-03)	Metric	08.12.2009	1991	DC Office / PC Branch	
	Farooq Khan	Sawab Gul	1710140041759		Mohmand/ 08.06.1988	Naib Qasid (BPS-03)	Nil	01.01.2011	Nil	AC Upper Office	
16	Hijran	Qandhari	2140279696351		Mohmand/	Mali (BPS-03)	Nil	01.03.2011	Nil	DC House	
	Javid Khan	Said Karim	2140606673159		Mohmand/ 1992	Naib Qasid (BPS-03)	Nil	01.06.2011	Nil	AC Baizai Office	

*Attested*  
*Gulzar*

**ATTESTED**


(11)

	Yasir Khan	Aftab Gul	1710103790795	Shabqadar/	Khakrob (BPS-03)	Nil	01.02.2013	Nil	AC Lower Office
19	Salman Khan	Isa Khan	2140693848147	Mohmand/ 07.08.1995	Naib Qasid (BPS-03)	F.A	29.03.2017	2020	DC Office
20	Amir Sohail	Zairat Shah	2140257427775	Mohmand/ 08.04.2001	Naib Qasid (BPS-03)	Matric	16.01.2019	2020	DC Main Office

*attested*  
*S/11/21*  
**ATTESTED**

*Jhans*  
Deputy Commissioner  
Mohmand Tribal District  
*08/11/21*

**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 <sup>st</sup> 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-	

*Witnessed*  
**ATTESTED**

10.	Mr. Noor Muhammad	Junior Clerk (BPS-11)	SSC	03.06.2007	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-	


*[Signature]*  
Deputy Commissioner  
Mohmand Tribal District

*[Handwritten]*  
28/11/21



**TENTATIVE SENIORITY LIST OF ASSISTANTS 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 <sup>st</sup> entry into service	Date of Promotion against present post	Domicile/ Date of birth	Method of Recruitment	Present post of posting	I have no objection over the seniority list
1	Mr.Samin Khan	Assistant (BPS-16)	SSC	01.02.1980	31.10.2018	Mohmand/ 10.04.1963	By Promotion	AC Lower Mohmand Office	
2	Mr.Ihsanudin	Assistant (BPS-16)	FA	01.03.1982	19.08.2020	Mohmand/ 10.1.1964	-do-	Tehsil Ambar	

  
Deputy Commissioner,  
Mohmand Tribal District.

68/11/21

**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 <sup>st</sup> 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	

  
 Deputy Commissioner  
 Mohmand Tribal District

✓  
 08/11/21

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**FINAL SENIORITY LIST OF CLASS-IV STAFF OF THE OFFICE OF DEPUTY COMMISSIONER MOHMAND TRIBAL DISTRICT  
(AS IT STOOD ON 31/12/2021).**

Annex - C

S. No.	Name of Official	Father Name	Designation of Post Held (BPS)	CNIC No.	Educational Qualification	Date of 1 <sup>st</sup> Entry into Service	Date of Passing SSC	Domicile / Date of Both	Place of Posting	I have no objection over the seniority list
1	Fazal Qadir		Naib Qasid BPS-05		Nil	01.12.1985		Bajaur/ 1964	Employee of FATA-DC (ADC F&P Office)	
2	Rosham Khan	Hashim Khan	Mali (BPS 04)	21406-0397348-7	Nil	01.11.1987	Nil	Mohmand / 1971	DC House	
3	Muhammad Gul	Hamesh Khan	Naib Qasid (BPS-04)	0013960207143	Nil	01.02.1990	Nil	Mohmand / 01.07.1963	Main Office	
4	Abdul Mohammad	Sher Mohammad	Khakrob (BPS-04)	00414293098585	Nil	01.03.1992	Nil	Mohmand/ 01.01.1967	Tehsil Prang Ghar	
5	Rekham Gul	Rehmat Gul	Naib Qasid (BPS-04)	21402-9226726-9	Nil	14.05.2002	Nil	Mohmand/ 01.01.1968	DC Office	
6	Adnan Khan	Usman Khan	Naib Qasid (BPS-04)	14286176011	Nil	01.01.2005	Nil	Mohmand/ 1986	DC Office	
7	Haji Mohammad	Sher Mohammad	Naib Qasid (BPS-04)	21407.5814982-5	Nil	30.04.2007	Nil	Mohmand/ 01.01.1980	Tehsil Prang Ghar	
8	Khitab Gul	Sanobar Khan	Chaukidar BPS-03	21406.6190879.1	Nil	01.10.2007	Nil	Mohmand/ 01.01.1975	DC Office	

collected  
L.H.K.  
TESTED

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13

9	Ajmir Khan	Zalam Khan	(Beheshti (BPS-03)	21406.3990840.3	Nil	01.10.2007	Nil	Mohmand/ 01.01.1980	DC House
10	Nasib Khan	Zaitullah Khan	Khakrob (BPS-03)	21407.1229324.9	Nil	01.10.2007	Nil	Mohmand/ Nil	AC UM office
11	Mohammad Roz	Amroz Khan	Naib Qasid (BPS-03)	21402.1450528.9	Nil	22.12.2008	Nil	Mohmand/ 01.01.1977	DC Office
12	Mohammad Imran	Shah Rom Bacha	Naib Qasid (BPS-03)	21407.7744772.5	SSG	22.12.2008	2020	Mohmand/ 13.03.1990	DC Office
13	Maqsood Khan	Mahid Amin	Survey Helper BPS 03	17301-1420135-1	FA+DIT	18.05.2009	1990	Mohmand/ 08.02.1974	ADC F&P Office
14	Gul Taj Khan	Astar Jan	Survey Helper BPS 03	21406.2565820.7	Middle	18.05.2009		Mohmand/ 01.01.1976	ADC F&P Office
15	Abdullah Khan	Dilawar	Naib Qasid BPS 03	21406-0246937-3	SSG	18.05.2009	1998	Mohmand/ 1979	ADC F&P Office
16	Ibrarullah	Mahid Ashraf	Naib Qasid BPS 03	17301-1627137-1	SSC	18.05.2009	1999	Mohmand/ 01.04.1982	ADC F&P Office
17	Khalid Khan	Sadam Khan	Process Server BPS 03	21407.6121896.9	SSG	10.08.2009	2012	Mohmand/ 20.04.1994	AC Lower Office
18	Waheed Gul	Khanzad Gul	Beheshti (BPS-03)	21407.3984748.5	SSC	01.10.2009	1999	Mohmand/ 09.09.1983	AC Lower Office
19	Waqar ul Hasan	Saida Gul	Naib Qasid (BPS-03)	17301.5777460.7	SSC	08.12.2009	1991	Mohmand/ 18.11.1973	DC Office
20	Shahid Khan	Ajmir	Naib Qasid BPS 03	17101-2303866-3	Middle	20.08.2010		Mohmand/ 1980	ADC F&P Office
21	Sardar Gul	Inam Gul	Survey Helper BPS 03	21407-021106-3	SSC	24.08.2010	2003	Mohmand/ 18.08.1987	ADC F&P Office
22	Faroq Khan	Sawab Gul	Naib Qasid (BPS-03)	17101.4004175.9	Nil	01.01.2011	Nil	08.06.1988	AC UM office
23	Hijran	Qandari	Mali (BPS-03)	21402.7969635.1	Nil	01.03.2011	Nil	Mohmand	DC House

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Promoted  
Finance

Promoted

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4/12/11

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(14)

24	Javid Khan	Said Karim	Naib Qasid (BPS-03)	21406.0667315.9	Nil	01.06.2011	Nil	Mohmand/ 1992	AC Baizai Office
25	Yasir Khan	Aftab Gul	Khakrob (BPS-03)	17101.0379079.5	Nil	01.02.2013	Nil	Shabqadar	AC Lower Office
26	Salman Khan	Issa Khan	Naib Qasid (BPS-03)	21406.9384814.7	FA	29.03.2017	2020	Mohmand/ 07.08.1985	DC Office
27	Abu Qiyas		Naib Qasid BPS-03		Middle	31.03.2017	—	Mohmand/ 01.01.1996	ADC F&P Office
28	Mohammad Israr		Chaukidar BPS-03		Nil	05.04.2018	—	Mohmand/ 07.03.1989	ADC F&P Office
29	Amir Suhail	Ziarat Shah	Naib Qasid (BPS-03)	21402.5742777.5	SSC	19.01.2019	2020	Mohmand/ 08.04.2001	DC Office
30	Sharafat Hayat	Hayatullah	Mali (BPS-03)	17301-8483852-1	B.A		1998	Mohmand	PMRU Office
31	Kashif Khan	Fazal Subhan			—		—	Mohmand	DC House

*Jam*  
Deputy Commissioner,  
Mohmand Tribal District

*Attested*  
**ATTESTED**



DEPUTY COMMISSIONER  
MOHMAND TRIBAL DISTRICT

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

Amex

No. 509-12/Acctt:  
Dated 26/01/2022

ORDER.

As recommended by Departmental Promotion Committee in its meeting held at Ghallanai on 25/01/2022, the following Class-IV. (BPS-04) (9900-440-23100) are hereby promoted to the post of Junior Clerks (BPS-11) (12570-880-38970) with immediate effect in the best interest of public:-

3. Mr. Maqsood Khan.
4. Mr. Waqar ul Hassan.

Deputy Commissioner  
Mohmand Tribal District

Copy to:-

6. Commissioner Peshawar Division Peshawar.
7. Additional Deputy Commissioners (G/F&P) Mohmand Tribal District.
8. Assistant Commissioners Mohmand Tribal District.
9. District Accounts Officer Mohmand Tribal District.
10. Official concerned.

acknowledged  
ATTESTED

بعد الت جب کمشنر صاحب رڈویشن خیبر نتونخوا

Annex E

Sl. No.:	
Name:	
Address:	
City:	
State:	
Post:	
Phone No.:	
Date:	11/02/22
Signature:	1415

1- محمد عمران ولد شاہ روم باچا ساکن پڑانگ غار حال ملازم (نائب قاصد) ضلعی انتظامیہ مہمند  
نام

1- ڈپٹی کمشنر صاحب ضلع مہمند

2- ایڈیشنل ڈپٹی کمشنر صاحب ضلع مہمند

3- اسسٹنٹ کمشنر لوئر مہمند

4- مقصود خان (سروے پلیر فنانس ڈیپارٹمنٹ)

5- وقار الحسن نائب قاصد ضلع انتظامیہ (ریسپانڈنٹ)

اپیل بہ نارائننگی فیصلہ ریسپانڈنٹ نمبر 1 بمورخہ 25-01-2022 جس نے بابت فائل

لسٹ مورخہ 31-12-2021 غیر منصفانہ طریقے سے برخلاف Board of Revenue Notification بمورخہ 25-06-2019 ریسپانڈنٹ نمبر 4,5 کو  
پروموٹ کر کے مورخہ 25-01-2022 سائل کی حق تلفی کی ہے حسب غرض رساں ہے۔

جناب عالی!

1- یہ کہ سائل ضلعی انتظامیہ میں بطور نائب قاصد بی پی ایس-4 اپنی ڈیوٹی سرانجام دے رہا ہے (نقل سرویس کارڈ منسلک ہے)  
2- یہ کہ سائل مورخہ 22-12-2008 کو پوسٹ مذکورہ بالا پر تعینات ہوا ہے اور سائل نے SSC تک تعلیم حاصل کی ہے (SSC سرٹیفکیٹ منسلک ہے)  
3- یہ کہ مورخہ 31-12-21 کو افسران بالا یعنی ریسپانڈنٹ نمبر 1 تا 3 نے سینیاریٹی لسٹ جاری کیا ہے اور مورخہ 25-01-2022 کو اپنا فیصلہ صادر کیا ہے۔ جو کہ  
خلاف قانون اور لوز اور سائل کی حق تلفی کی ہے یعنی سائل کی جگہ ریسپانڈنٹ نمبر 4 مقصود خان نامی شخص کو promote کیا ہے جو کہ finance department میں  
سروے پلیر ہے۔ اور انکی تاریخ تعیناتی مورخہ 18-05-2009 ہے۔ جبکہ سائل کی تاریخ تعیناتی 22-12-2008 ہے جس سے صاف عیاں ہے کہ مذکورہ شخص  
سائل سے جو نیئر ہے۔ اور اسی طرح وقار الحسن جو کہ ضلعی انتظامیہ میں بطور نائب قاصد تعینات ہے اور جس کی تاریخ تعیناتی 08-12-2009 ہے جس سے صاف عیاں  
ہے کہ وہ بھی سائل سے جو نیئر ہے جو کہ خلاف رولز نوٹیفیکیشن Board of Revenue بمورخہ 25-06-2019 ہے (نقل فائل سینیاریٹی لسٹ بمع کاپی  
نوٹیفیکیشن رولز منسلک ہے۔

4- یہ کہ سائل نے Tentative list جاری کرنے کے بعد باقاعدہ اعتراض بھی جمع کیا ہے جسکی درخواست بحوالہ ڈپٹی کمشنر افس ہے (نقل اعتراض درخواست منسلک  
ہے

5- یہ کہ وقار الحسن نے ایف سی سے ریٹائرڈ شدہ ملازم ہے اور سائل سے جو نیئر ہے۔

6- یہ کہ فیصلہ ڈپٹی کمشنر افس مہمند منصفانہ اور بمطابق قانون نہیں ہے جسکی درنگی درکار ہے۔

7- یہ کہ فیصلہ ڈپٹی کمشنر افس مہمند مسترد کرانے میں کوئی قانونی ممانعت نہیں ہے۔

لہذا استدعا ہے کہ جو فیصلہ 25-01-2022 کو ڈپٹی کمشنر افس مہمند نے جاری کیا اس کو مسترد کیا جائے اور سائل کو اپنا حق دلانے کی احکامات جاری کیے جائے۔

عین نوازش ہوگی المرقوم: 10-02-2022

العارض!

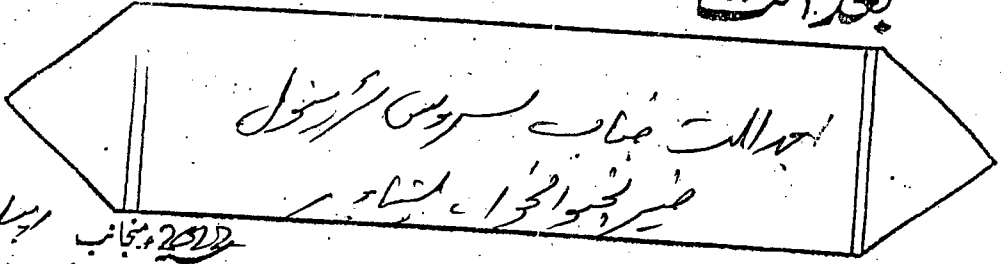
ایکاتابعدار محمد عمران نائب قاصد ضلعی انتظامیہ مہمند

موبائل نمبر 03439677116

11/2/2022

ATTESTED

## بعد الت



2022ء پنجاب ایبارک

محمد عمران بنام حکومت KPK

مورخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آئنگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام کیلیہ آصف علی شاہ سدیک کیلئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالثتہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لایا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ  
پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

الرقوم 30 \_\_\_\_\_ ماہ مئی 2022ء

کے لئے منظور ہے۔  
attested  
by receipt

بمقام لیسٹاد

Signature

h.c.a  
h.c.d.v.c.a.e.s.r.7@gmail.com  
0333-9006806

adv. bilal khalid@gmail.com  
0346-5766739