

23.01.2019

Nemo for appellant.

On 28.12.2018 order for issuance of notice to appellant as well as his counsel was passed as none of them was available at the time of hearing. The requisite notices were issued, despite the appellant is un-represented even today. The case was called more than once.

Dismissed for want of prosecution. File be consigned to the record room.

Announced:
23.01.2019



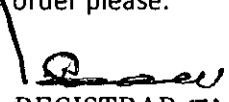


Chairman
Camp Court, D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 1074 /2018


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/08/2018	<p>The appeal of Mr. Farooq Azam resubmitted today by Mr. Asad Nabi 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 31/8/18</p>
2-	28.12.2018	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>28.12.2018</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Neither appellant nor his counsel present therefore, notice be issued to appellant and his counsel for attendance and preliminary hearing for 23.01.2019 before S.B at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court D.I. Khan</p>

The appeal of Mr. Farooq Azam Secretary Union Council Panyala Paharpur D.I. Khan received today i.e. on 29.08.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

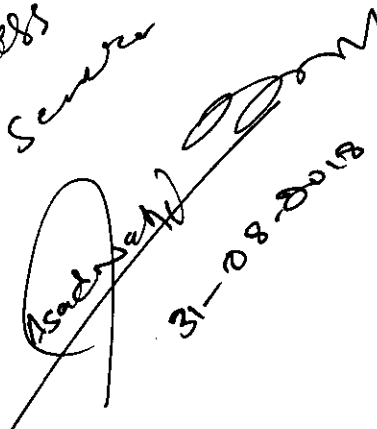
- 1- ✓ Address of respondent no. 5 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- ✓ Annexures of the appeal may be attested.
- 3- ✓ Annexures of the appeal may be flagged.
- 4- ✓ Annexures A&B of the appeal are illegible which may be replaced by legible/better one.
- ✓ 5- Copy of seniority list mentioned in the memo of appeal is not attached with the appeal which may be placed on it. *anna(F) seniority list*

No. 1746 /S.T,

Dt. 29/8/2018.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asad Nabi Adv. Pesh.

NOTE
as per Service Tribunal
Rule 7 Regulation the
signed has completed all
the legal documents as per
law so please put it before
Senior Tribunal

31-08-2018

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No:- 1074 /2018

Farooq Azam.....Appellant

V E R S U S

Director General Local Government & Rural Development Department
Khyber Pakhtunkhwa & others.....Respondents

I N D E X

<u>S. NO</u>	<u>DESCRIPTION OF DOCUMENTS</u>	<u>ANNEX</u>	<u>PAGES</u>
1.	Grounds of Service Appeal	*	1-5
2.	Affidavit	*	6
3.	Addresses of Parties	*	7
4.	Copy of the Promotion Order dated 21/02/1995	"A"	8-10
5.	Copy of the office order dated 19/09/2001	"B"	11-12
6.	Copy of order dated 07/03/2018	"C"	13
7.	Copy Departmental appeal & service books and relevant documents - r - e seniority list	"D", "E" & "F"	14-24
8.	Wakalat Nama	*	25

Date 29/08/2018

Through

Appellant
(Asad Nabi)
Asad Nabi,
Advocate High Court,
Peshawar.
Cell No:- 0345-9122165

9

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No:- 1074 /2018

Diary No. 1348

Dated 29-8-2018

Farooq Azam Secretary Union Council Panyaia North Tehsil Pahar Pur
R/O Village & Post office Abdul Khalil District Dera Ismail
Khan.....Appellant

VERSUS

1. Director General Local Government & Rural Development Department
Khyber Pakhtunkhwa.
2. Secretary Local Government Khyber Pakhtunkhwa.
3. Assistant Director Local Government Dera Ismail Khan.
4. Deputy Director Admin/HR LG&RDD Local Govt KPK
5. Shireen Khan Supervisor LG&RD Office ^{OF THE ASSISTANT DIRECTOR LG&RDD} Dera Ismail Khan
.....Respondents

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED PROMOTION ORDER/SENIORITY LIST ISSUED
BY THE ASSISTANT DIRECTOR (RESPONDENT NO 3) AND ORDER
DATED 07-03-2018 OF THE RESPONDENTS NO 1 & 4 WHEREBY THEY
PROMOTED THE RESPONDENT NO 5 TO THE POST OF SUPERVISOR

WITHOUT PERUSING THE SERIAL VISE SENIORITY LIST/ PROMOTION
CASES ON WRONGS PRESUMPTIONS.

Prayer:-

On the acceptance of this Appeal, the impugned order of
respondent No 3 for issuing promotion order/seniority list dated 27/02/2015 &
order dated 07/03/2018 of the respondents may very kindly be set aside and
to promote the appellant as per serial-vise Seniority List and also to correct
Seniority list as per previous status.

Re-submitted to-day
and filed.

Registrar 21/8/18

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Respectfully Sheweth:-

1. That the appellant has Been Appointed by the Director Water Management Khyber Pakhtunkhwa the then (NWFP) as Junior clerk.
2. That after successful lapse of service tenure at service the Director Agriculture Engineering KPK Tarnab has promoted the appellant from junior clerk to senior clerk vide office order/letter No 1941-73 dated 21/02/1995. **(Copy of the Promotion Order is attached as annexure "A")**.
3. That the appellant has desirous to work hard for promotion and want to promote the department as per his best effort but unfortunately the appellant department burdened due to financial crises most of the employees declare surplus the appellant is one of them vide letter dated 30/01/2001 and ignored the actual position that the appellant is senior employee and spent precious years in service and also too ignored the seniority list /promotion case of appellant with malafide intention just to deprived the appellant from his fundamental right guaranteed by the Constitution of the land 1973.
4. That thereafter District Coordinator Officer Dera Ismail Khan has adjusted the appellant as Secretary Union Council namely Miran DI Khan against the vacant post vide office order No 5431-5531 on 19/09/2001. **(Copy of the office order is attached as annexure "B")**.
5. That from 21/02/1995 to 19/09/2001 name of the appellant has correctly been mention in seniority list as per departmental seniority list

(3)

the petitioner is satisfied as legitimate expectation soon he will be promoted to some other high seat accordingly.

6. That respondent No 3 has issued promotion office order/ promotion list whereas the appellant has been mention junior from respondent No 5 in fact the date of joining the appellant is 19/11/1981 and the respondent is 22/11/1981 which is prima facie entitled the appellant for promotion instead of respondent No 5 but with malafide intention the appellant is place at serial No 28 in promotion list which is illegal and without perusing the material.
7. That thereafter respondent No 1 & 4 issued office order on 07/03/2018 in which they promoted respondent No 5 to the post of supervisor LG&RD Dera Ismail Khan instead of appellant which is illegally and liable to be set aside. **(Copy of order dated 07/03/2018 is attached as annexure "C")**
8. That appellant being aggrieved from the promotion order/ promotion/ seniority list issued by the assistant director respondent no 3 and thereafter promotion office order dated 07/03/2018 issued by the respondents No 1 & 4 whereas respondent no 5 has been promoted illegally instead of appellant has filed departmental appeal for the redressed of his grievances on 28/05/2018 which is still pending and passed his statutory life i.e. 90 days and no reply whatsoever has been given best known to them. **(Copies of departmental appeal, Service Books & relevant documents are attached as annexure "D" "E" & "F" respectively).**

1. The first part of the document discusses the importance of maintaining accurate records of all transactions.

2. It is essential to ensure that all entries are clearly legible and dated.

3. Regular audits should be conducted to verify the accuracy of the records.

4. Any discrepancies should be investigated and corrected immediately.

5. The final section of the document provides a summary of the findings and recommendations.

6. It is recommended that these procedures be followed as a standard practice.

7. The second part of the document details the specific steps for recording transactions.

8. Each entry should include the date, amount, and a brief description of the transaction.

9. It is important to use consistent terminology throughout the records.

10. The third part of the document discusses the role of the auditor in verifying the records.

11. The auditor should review the records for any signs of tampering or error.

12. Any irregularities should be reported to the appropriate authorities.

13. The document concludes with a statement of the author's intent to provide a clear and concise guide.

- 4
9. That appellant being aggrieved from the non-disposal of departmental appeal which was sub-judice before the Director General Local Government Dera Ismail Khan which has passed his statutory life and promotion order of the respondent No 3 and thereafter respondent No 1 & 4 promotion order whereas respondent No 5 has been promoted hence the Service Appeal on the following grounds inter alia:-

GROUND:-

- A. That promotions orders of the respondents are against the service law in vogue and material available on services file of the appellant which is not main table and liable to be set aside.
- B. That promotion orders issued by the respondent are without perusing the material available on file which is not tenable and liable to be set aside and provide ample opportunities to the appellant being heard.
- C. That appellant after passing the numerous years in services surplus by respondent which is illegally because the only employee who declare surplus are junior most which is not followed by the respondent.
- D. That it is the fundamental principal and maxim audi alterim partam hear the other side which has not been followed by the respondent department which shows the malafide intention on the part of the respondent department.
- E. That any other ground which is not specifically mentioned in the grounds of Appeal may also be argued before this Honorable Forum at the time of arguments.

CS

It is therefore humbly prayed that on acceptance of this appeal the promotion order /seniority list issued by the respondent No 3 Assistant Director Local Government and subsequent promotion order of the respondents No 1 & 4 in favour of the respondent No 5 may very kindly be set aside and to promote the appellant as per departmental seniority list and also to correct the departmental seniorities list as per record of the year 21/02/1995 to 19-09-2001.

Any other relief which is deemed proper argued at the time of argument.

Date 29/08/2018

Through

Appellant
Asad Nabi,
Advocate High Court,
Peshawar.
Cell No:- 0345-9122165

6

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No:- _____/2018

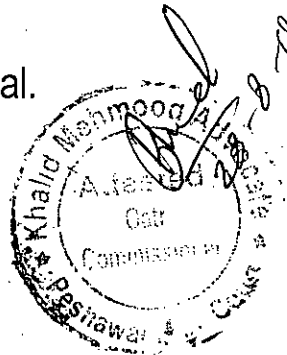
Farooq Azam.....Appellant

V E R S U S

Director General Local Government & Rural Development Department
Khyber Pakhtunkhwa & others.....Respondents

AFFIDAVIT

I, Asad Nabi Advocate, High Court Peshawar as per instructions of my client all the contents of the above appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.



A. Asad Nabi
ADVOCATE

2

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No:- _____/2018

Farooq Azam.....Appellant

V E R S U S

Director General Local Government & Rural Development Department
Khyber Pakhtunkhwa & others.....Respondents

ADDRESSES OF PARTIES

APPELLANT

Farooq Azam Secretary Union Council Panyala North Tehsil Pahar
Pur R/O Village & Post office Abdul Khalil District Dera Ismail Khan

RESPONDENTS

1. Director General Local Government & Rural Development
Department Khyber Pakhtunkhwa.
2. Secretary Local Government Khyber Pakhtunkhwa.
3. Assistant Director Local Government Dera Ismail Khan.
4. Deputy Director Admin/HR LG&RDD Local Govt KPK
5. Shireen Khan Supervisor LG&RD Office Dera Ismail Khan

Date 29/08/2018

Through

Appellant
Asad Nabi
Asad Nabi,
Advocate High Court,
Peshawar.
Cell No:- 0345-9122165

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OFFICE ORDER.

Mr. Fayyaz Alam S/O. Mohammad Akbar
 of Village Abdool Lail P.O. A-Khel Tehsil D.I. Khan
 District D.I. Khan is hereby offered a temporary post of
Junior Steno in N.P.S. 5. His appointment
 is purely temporary and his services can be terminated any time
 with-out notice.

In case of resignation he will have to give 14 days
 notice in advance or in lieu his one month pay will be forfeited.

Before joining the duties he shall produce health
 and age certificate to the office in which he is posted.

He shall be governed by the NWFP, Civil Servant
 Efficiency and disciplinary Rules, 1973.

If he accepts the offer he shall report for duty
 to the Office of Project Director D.I. Khan NWFP, W.M. D.I. Khan
 on or before 1/12/1981.

Sd/-
 (Sheikh Dost Mohammad)
 Director,
 Water Management,
 NWFP, Peshawar Cantt.

Nb. 3273-75/N.W.M./dated Peshawar the, 17-11-1981

Copy to:-

1. The ~~Assistant~~ Director Water Management
2. The ~~Project Director~~ On-Farm Water Management Project
Paharpure D.I.Khan.
3. The official concerned.
4. The Establishment Assistant of this office for information
and n/action.

Mohammad
 Director,
 Water Management,
 NWFP, Peshawar Cantt.

Attested

[Signature]

Attested

OFFICE ORDER

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Consequently upon the recommendation of Departmental Committee in the meeting held on 12.11.99 at 10.00 AM, among Senior Clerks and Junior Clerks are hereby promoted in the places noted against each with immediate effect.

Name and Designation	From	To
Mr. Mohammad Nisar Senior Clerk BPS-9	OFFICE OF THE ASSTT: Agril: Engr (Drilling) Tarnab, Pesh.	Promoted as OFFICE Asstt: in BPS-11 and posted in OFFICE OF THE Undersigned.
Mr. Gul Mahiti Senior Clerk BPS-9	OFFICE OF THE ASSTT: Agril: Engr (F.O) Nowshera.	Promoted as Office Asstt: in BPS-11 and posted in the OFFICE OF THE Agril: Engr. Kohat Divn. Kohat.
Mr. Raza Khan Senior Clerk BPS-9	OFFICE OF THE ASSTT: Director: Water Management- Mukt. Mansehra	Promoted as Office Asstt: in BPS-11 and posted in the OFFICE OF THE Director: Water Management, NWFP, Pesh.
Mr. Taj Mohammad Senior Clerk BPS-9	Office of the Director, Water Management, NWFP Peshawar.	Promoted as Office Asstt: in BPS-11 and posted in office of the Director, Water Management, NWFP, Peshawar.
Mr. Waheedur Rehman Junior Clerk BPS-7	Asstt: Agril: Engineer (F.O) Tarnab.	Promoted as Senior Clerk in BPS-7 and posted in the office of the under- signed.
Mr. Farooq Azam Junior Clerk BPS-7	Agril: Engineer DIKhan.	Promoted as Senior Clerk in BPS-7 and posted in the office of the Agril: Engr. Tarnab Areas, Peshawar (Hayatabad).
Mr. Shazia Khan Junior Clerk BPS-7	Office of the Director, Water Management, NWFP, Peshawar.	Promoted as Senior Clerk in BPS-7 and posted in the office of the Director, Water Management, NWFP, Pesh:
Mr. Hazrat Gul, Junior Clerk BPS-7	OFFICE OF THE Director, Water Management, NWFP, Peshawar.	Promoted as Senior Clerk in BPS-7 and posted in the OFFICE OF THE Director, Water Management, NWFP, Pesh.
Mr. Naveed Junior Clerk BPS-7	OFFICE OF THE Project Dir: W. Management DIKhan.	Promoted as Senior Clerk in BPS-7 and posted in the OFFICE OF THE Dir: Water Management, NWFP, Peshawar.
Mr. Murtaza Ahmad Junior Clerk BPS-7	Office of the Asstt: Agril: Engineer (F.O) Mansehra-II.	Promoted as Senior Clerk in BPS-7 and posted in the said office.
Mr. Gul Mohammad Junior Clerk, BPS-7	Office of the Project Director Water Management, D.I. Khan.	Promoted as Senior Clerk in BPS-7 and posted in the said office.

Attested

Associate Prof
Federal Govt College

S.No.	Name and Designation.	From	To
12.	Mr. Muhammad Sam Junior Clerk	Asstt: Director Water Management Dist. Mansehra	Promoted as Senior Clerk in the office posted in office of the Director, Water Management, NWFP, Peshawar.
13.	Mr. Abdul Wahab Junior Clerk BPS-2	Office of the Asstt: Agril: Engineer (F.O) Bannu.	Promoted as Senior Clerk in BPS-7 and posted in office of the Hydrogeologic Asstt 1/c Agril: Engineer, Bannu Division, Bannu.

SD/- (ABDUL WAHAB KHAN)
Director,
Agril: Engineering,
NWFP, Tarnab, Peshawar.

No. 1941-73 /DAE/Estt: dated Tarnab, the 21/2/1995.
Copy forwarded to:-

1. All Concerned officials;
 2. The Director, Water Management, NWFP, Peshawar;
 3. The Director, Agricultural Engineering, Peshawar Division, Tarnab;
 4. The Agricultural Engineer, Peshawar Division, Abbottabad;
 5. The Agricultural Engineer, Hazara Division, Abbottabad;
 6. The Agricultural Engineer, Dikhan Division, Dikhan;
 7. The Agricultural Engineer, Bannu Divn. Bannu;
 8. The Hydrogeologist I/C Agril: Engineer, Bannu Divn. Bannu;
 9. The Agricultural Engineer, Tribal Areas, Peshawar;
 10. The Agricultural Engineer, Kohat Division, Kohat;
 11. The Asstt: Agril: Engineer (F.O) Kohat; Tarnab;
 12. The Asstt: Agril: Engineer (F.O) Nowshera;
 13. The Asstt: Agril: Engineer (F.O) Mansehra II;
 14. The Asstt: Agril: Engineer (Drilling) Tarnab;
 15. The Asstt: Agril: Engineer (F.O) Bannu;
 16. The Accountant General, NWFP, Peshawar;
 17. The Additional Accountant General (PR) Peshawar, Peshawar;
 18. The District Accounts Officer, Dikhan;
 19. The District Accounts Officer, Bannu;
 20. The District Accounts Officer, Kohat;
 21. The District Accounts Officer, Nowshera;
 22. The District Accounts Officer, Mansehra;
 23. The Asstt: Accounts Officer of this office.
- for information.

*Not Retained for
Digestible*

Attested

Attested
Associate Prof
Federal Govt College
Peshawar

Attested
Director,
Agril: Engineering,
NWFP, Tarnab, Peshawar.

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OFFICE OF THE
DISTRICT COORDINATION
OFFICER, D.I.KHAN.

No. 5430 /D.C.O (Estt: UC)

Dated D.I.Khan the 19/9/2001.

OFFICE ORDER.

The following posting/adjustment of the Secretaries Union Councils in District D.I.Khan are hereby made under the devolution plan with immediate effect :-

No.	Name of Secretary, UC.	Name of UC where posted / adjusted.
<u>T.M.A, Tehsil, DIKHAN.</u>		
1-	Muhammed Farooq.	Urban UC NO.1, D.I.Khan.
2-	Muhammed Ayub.	Urban UC NO.2, D.I.Khan.
3-	Mashkoor Hussain.	Urban UC NO.3, D.I.Khan.
4-	Muhammad Ramzan.	Urban UC NO.4, D.I.Khan.
5-	Imam Bekhs.	Urban UC NO.5, D.I.Khan.
6-	Riaz Hussain Shah.	UC Dera Dehat No.1.
7-	Muhammad Zubair.	UC Dera Dehat No.2.
8-	Muhammad Nawaz.	UC Zandani.
9-	Muhammad Saleem.	UC Shore Kot, at Himat Wala.
10-	Muhammad Akram Marwani.	UC Ratta Kulachi.
11-	Malik Rustam.	UC Dewals.
12-	Amin Sultan.	UC Lydan Sharif.
13-	Abdul Waheed.	UC Lachra.
14-	Abdul Latif S/O Abdul Aziz.	UC Giloti.
15-	Nazakat Hussain.	UC Yanik.
16-	Atta Hussain Shah.	UC Monahrenu Kalam.
17-	Akram Saleem.	UC Kursi.
18-	Mumtaz Khan.	UC Gara Isa Khan.
19-	Qaiser Abbas.	UC Chehkan.
20-	EKram-ul-Haq.	UC Koch.
21-	Muhammed Aslam.	UC Kolla Sidam.
22-	Farooq-e-Azam.	UC Miran.
23-	Haji Rehmaullah.	UC Nuryal.
24-	Saeed Ahmad.	UC Daraban Kalam.
25-	Shaniv Khan.	UC Miran.
26-	Ahmed Ram.	UC N. Kalat.
27-	Abdul Sattar.	UC Pharam.
28-	Khalid Muhammad.	UC Pharam.
29-	Gul Muhammad.	UC Monah. 1 Sharif.
30-	Nadir Khan.	UC Klori Smeozal.
31-	Abdul Kareem.	UC Chowin.

Attested

Attested

[Signature]

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32-	T.M.A. PAHARPUR	UC Paharpur Town.
33-	Abdul Latif S-O Amir Hamza.	UC Pampala.
34-	Shah Ahmad.	UC Kandi Khairi.
35-	Muhammad Iqbal.	UC Bilot Sharif.
36-	Muhammad Khan.	UC Khatkhata.
37-	Muhammad Hussain Shah.	UC Khatkhata.
38-	Kamal Khan.	UC Bighani Sitawali.
39-	Asmat Ullah.	UC Lora.
40-	Kasim Hussain.	UC Dhap Shumail.
41-	Ghulam Samdani.	UC Band Kandi.
42-	Muhammad Anwar.	UC Wanda Khan Mubarak.
43-	Haji Aman Ullah.	

43-	T.M.A. KULACHI.	UC Nathala.
44-	Misbahuddin.	UC Kulachi Town.
45-	Muhammad Ishaq.	UC Maddi.
46-	Abdus Samad Khan.	UC Looni.
47-	Munammad Ramzan Gandapur.	

DISTRICT COORDINATION OFFICER, D.I.KHAN.

Enst:No. 5431-5531/D.C.O.(Estt:UC) Dated D.I.Khan. 19/5/2001.

Copy to :-

- 1- The Zila Nazim, D.I.Khan.
- 2- The Tehsil Nazims, D.I.Khan, Paharpur & Kulachi.
- 3- The T.M.Os, D.I.Khan, Paharpur & Kulachi.
- 4- All Nazims of Union Councils in District D.I.Khan.
- 5- The District Accounts Officer, D.I.Khan.
- 6- All Secretaries, Union Councils in District D.I.Khan.

Attested by Asad Nabi Advocate

Attested

Associate Prof Federal Govt College Peshawar

DISTRICT COORDINATION OFFICER, D.I.KHAN.



13, Annex C
OFFICE OF THE DIRECTOR GENERAL
LOCAL GOVERNMENT & RURAL DEVELOPMENT
DEPARTMENT KHYBER PAKHTUNKHWA

Dated the Peshawar 7th March 2018

OFFICE ORDER

No. Director (L.G.)/3-12/DPC/2016-17/10926-A
Consequent upon the recommendations of the Departmental Promotion Committee in its meeting held on 06.03.2018, the Competent Authority has been pleased to promote Mr. Shereen Khan Village Secretaries (BPS-07), Village Secretary (BPS-07) to the post of Supervisor LG&RD (BPS-09) with immediate effect and to post him as Supervisor (BPS-09) against the vacant post in the office of Assistant Director LG&RDD, D.I.Khn. On his promotion the terms and conditions of his appointment will remain the same on which he was appointed.

-sd/-
Director General
LG&RDD

Endst of Even No. & Date

Copy of the above is forwarded to the

1. Section Officer (E.stab) LG&RDD Khyber Pakhtunkhwa
2. Assistant Director LG&RDD D.I.Khan
3. District Accounts Officer D.I.Khan
4. PA to Director General LG&RDD Peshawar
5. Mr. Shereen Khan, Supervisor, Office of AD LG&RD D.I.Khan.

Attested

Deputy Director (Admin/HR)
LG&RDD

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محضور جناب ڈائریکٹر جنرل لوکل گورنمنٹ ڈیپارٹمنٹ ڈیرہ اسماعیل خان

Annex D

عنوان: درخواست برائے سناریائی درستی (اپیل)

ڈیپارٹمنٹل اپیل بابت درستی سناریائی لسٹ برطانیہ قانون و انصاف قرار دینے سے متعلقہ سال کو سناریائی میں یونین کوئل

جناب عالی!

- 1- یہ کہ سال 17 نومبر 1981ء کو دفتر ڈائریکٹر واٹر مینجمنٹ این۔ ڈی۔ ایف۔ پی پشاور میں بطور جونیئر فلک بھرتی ہوا ہے۔
- 2- یہ کہ ڈائریکٹر ایگریکلچر انجینئرنگ این ڈی ایف پی پشاور نے سال 1995-02-21 کو بطور جونیئر فلک سے سینئر فلک Promote کیا۔ مراسلہ بحوالہ چٹھی 1941-73 نمبر مورخہ 1995-02-21 (کاپی لف ہے)۔
- 3- یہ کہ سال عمر 37 سال سے ڈیوٹی حسن طریقے سے انجام دے رہا ہے اور وقت گزرنے کے ساتھ ساتھ حکموں پر مبنی پڑھ گیا، جس کی وجہ سے ملازمین کی تلیم کی گئی۔ جس میں سے نہ صرف سال بلکہ دیگر ملازمین کو سہولتیں مورخہ 2001-01-30 قرار دیا گیا بد قسمتی سے سال کو سناریائی لسٹ اور پروموشن کیمر بائیکل نظر انداز یعنی نا انصافی کی گئی ہے۔
- 4- یہ کہ ڈسٹرکٹ کوآرڈینیٹر ڈیرہ اسماعیل خان نے سال کو 19-09-2001 کو بطور سیکرٹری یونین کوئل میرن ایڈجسٹ کیا۔ آفس آرڈر نمبر 5431-5531 مورخہ 19-09-2001 (کاپی منسلک ہے)۔
- 5- یہ کہ مورخہ 21-02-1995 سے 19-09-2001 تک سناریائی لسٹ میں میرل واٹر میری سناریائی ٹھیک آ رہی ہے۔
- 6- یہ کہ Assistant Director لوکل گورنمنٹ ڈیپارٹمنٹ نے 27-02-2015 کو پروموشن آرڈر Issued کیا۔ جس میں ٹرین جونیئر فلک / سیکرٹری یونین کوئل کو مجھ سے سینئر Mentioned کیا گیا ہے۔ حالانکہ وہ مجھ سے سروس پیروڈ میں جونیئر ہے۔ ٹرین خان نے دفتر میں حاضری رپورٹ 22-11-1981 کو اور میں نے 19-11-1981 کو پیش کی ہے۔ پروموشن لسٹ میں وہ میرل نمبر 05 اور مجھے میرل نمبر 28 پر رکھا گیا ہے۔ (سروس بکس اور پروموشن لسٹ کی کاپی لف ہے)۔ جو کہ سروس رول ریگولیشن کی صریح خلاف ورزی ہے۔

لہذا مذکورہ بالا مراسلوں، خطوط اور چٹھی ہائے کہہ نظر رکھتے ہوئے میں آپ صاحبان سے عاجز اپنا اپیل ہے کہ اے مہربانی سے سناریائی صحیح اور درست کر کے سال کو اپنا حق برطانیہ قانون و انصاف قرار دیا کر انصاف و قانون کے تقاضے پورے کئے جائیں۔

عین نوازش ہوگی۔ 15-5-2018

العبد
فاروق اعظم ساکن گاؤں کوئل سیکرٹری پیپالہ شمالی تحصیل پھاڑپور
گاؤں وڈا کاناہ عبدالغنیل ڈسٹرکٹ ڈیرہ اسماعیل خان

Attested

True copy

کاپی برائے
سیکریٹری لوکل گورنمنٹ ڈیرہ اسماعیل خان
اسٹنٹ ڈائریکٹر ڈیرہ اسماعیل خان (لوکل گورنمنٹ)

Disary No: 8951

dt: 28.5.2018

No. 976

For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Received a registered*
addressed to

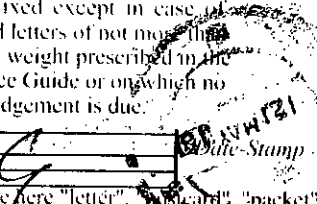
Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Initials of Receiving Officer

Insured for Rs. (in figures) 1000 (in words) one thousand
Insurance fee Rs. 100 Ps. 100 (in words) one hundred
Name and address of sender M. D. R.

If insured.

14-A



No. 977

For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

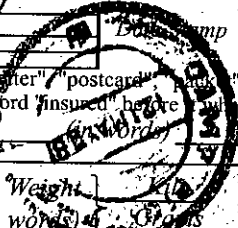
Received a registered*
addressed to

Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Initials of Receiving Officer

Insured for Rs. (in figures) 1000 (in words) one thousand
Insurance fee Rs. 100 Ps. 100 (in words) one hundred
Name and address of sender M. D. R.

381



No. 978

For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

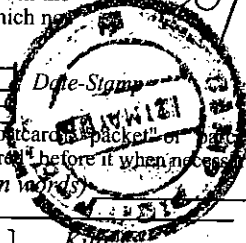
Received a registered*
addressed to

Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Initials of Receiving Officer

Insured for Rs. (in figures) 1000 (in words) one thousand
Insurance fee Rs. 100 Ps. 100 (in words) one hundred
Name and address of sender M. D. R.

381



Attested

فاروقی راجہ محمد علی صاحب مدظلہ العالی کے لئے

SERVICE BOOK

Duplicate

FAROOQ AZAM...s/o.....

M. O. H. A. M. M. A. D. A. Z. A. M.

0345 900 3053 = 0332 922 1991 = 0312 900 3053

دریغ کو نسل سکریٹری گنڈاپور

سرور سبک

Attested

★ وطنے کا ہتھیار ★

بلوچ براڈرز - بازار کلاں - ڈیرہ اسماعیل خان
فون نمبر ۲۸۲۱

گومل آرٹ پریس

فون نمبر: ۲۴۲۱

(16)

1	2	3	4	5	6	7	8	
Name of Post	Whether substantive or officiating and Whether permanent or temporary	if officiating state— (i) substantive appointment or (ii) whether service counts for pension under Act 371, C.S.R.	Pay id. substantive Post	Additional Pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant	
290-10-350/12-420-14-54.5					2 PAY.			
Junior Clerk	Offg. Temp.			290/-		19-11-81 (F. Nazam)	[Signature]	
DO	DO	DO		300/-		1-12-82	[Signature]	
520-18-880	Pay fixed in Basic Pay Scale							
Junior Clerk	Offg. Temp.			538/-		12/83	[Signature]	
DO	DO	DO		556/-		12/83	[Signature]	
do	do	do		574/-		12/84	[Signature]	
do	do	do		592/-		12/85	[Signature]	
do	do	do		610/-	110/-	12/86	[Signature]	

Attested
 Associate Prof
 Federal Govt College
 Peshawar

Attested

Signature designation head of the other att officer in at of column

P.D.
 O.F.W.
 D.I. KH
 on

A A T I

A D A T I

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in

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1983

7

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3

9	10	11	12	13		14	15
Signature and designation of the head of the office of the officer attesting in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as Promotion transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	LEAVE		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government.
				Nature and duration of leave taken	Allocation of periods of leave on average Pay up to four months for which leave salary is debit to another Government		
<i>[Signature]</i>	30/11/82	Annual increment	<i>[Signature]</i>				NO 3273 - FIDWM dt 17-11-81 Reference to any recorded punishment or censure, or reward or praise of the Government.
			Project Director On Farm Water Management Dera Ismail Khan				Project Director On Farm Water Management Dera Ismail Khan
<i>[Signature]</i>	30/6/83	Basic Pay Increment Scale	<i>[Signature]</i>				Service verified from pay bills record w.e.f. 19-11-81 to 30-11-82.
			Project Director On Farm Water Management Dera Ismail Khan				Project Director On Farm Water Management Dera Ismail Khan
<i>[Signature]</i>	30/11/83	Annual increment	<i>[Signature]</i>				granted rest and recreation allowance for the calendar year 1983, equal to his half months pay viz Rs 150/- vide D.O. no: 812-13/10 dt 13-2-1983
			Project Director On Farm Water Management Dera Ismail Khan				Project Director On Farm Water Management Dera Ismail Khan
<i>[Signature]</i>	30/11/84	Annual increment	<i>[Signature]</i>				Service verified from pay bills record w.e.f. 1.12.82 to 30/11/83
			Project Director On Farm Water Management Dera Ismail Khan				Project Director On Farm Water Management Dera Ismail Khan
<i>[Signature]</i>	30/11/86	Transfer to P.A.F	<i>[Signature]</i>				Service verified from pay bills record w.e.f. 1/12/83 to 30/11/84.
			Assistant Director Water Management Abbottabad.				Assistant Director Water Management Abbottabad.

Attested

Associate Prof
Federal Govt College
Peshawar

(13)

(12)

~~ASMA~~

سید وسیم شاہ

شیرین ویج کونسل سیکرٹری
03459889639

شیرین خان پرنسپل 193544

Shreen 4g8dd@gmail.com

Attested

8	9	10	11	12	13	14	15	
Signature of Government servant	Signature and designation of the Head of the office or other Attesting Officer in the column (to be)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE Allocation of periods of leave on average pay up to four months (or extended leave not exceeding 20 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
توقيع الموظف الحكومي	توقيع مدير المكتب أو غيره من الموظفين في العمود (على أن يكون)	تاريخ التنازل أو التعيين	سبب التنازل (مثل الترقية، النقل، الفصل، الخ)	توقيع مدير المكتب أو غيره من الموظفين	توزيع فترات إجازة على متوسط أجر حتى أربعة أشهر (أو إجازة ممتدة لا تزيد عن 20 يوم) والتي يكون أجرها مستحقاً من راتب إجازة آخر في حكومة أخرى	توقيع مدير المكتب أو غيره من الموظفين	إشارة إلى أي عقوبات مسجلة، أو توبيخ، أو مكافأة أو تمجيد من قبل الحكومة	
11/8/83	Signature of Dera Ismail Khan	30/11/82 (AN)	Annual Increment	Project Director On Farm Management Dera Ismail Khan			Services Verified by Pay bills received from 22-11-81 to 30-11-82	
12/8/83	Signature of Dera Ismail Khan	30/11/83	Annual Increment	Project Director On Farm Management Dera Ismail Khan			Services Verified by Pay bills received from 1-12-82 to 30-11-83	
12/8/83	Signature of Dera Ismail Khan	30/11/83	Annual Increment	Project Director On Farm Management Dera Ismail Khan			Services Verified by Pay bills received from 1-12-82 to 30-11-83	
12/8/85	Signature of Dera Ismail Khan	30/11/83	Annual Increment	Project Director On Farm Management Dera Ismail Khan			Services Verified by Pay bills received from 1-12-82 to 30-11-83	

Attested

Asstt. Director (Admin) to
Project Director OFWM, D-I-Khan

11/8/83
12/8/83

1983
Drawn As
Allowance for The
Year 1983
Date 15-2-83
Addl. Distl
D. Khan

Granted rest and
discretion allowance
for the calendar
year 1983, equal to
his half months
pay viz Rs 150/- vide
D.O. No. 812-13/10.11.13-2-83

28	Farooq Azam	Matric	01.04.1961	D.I.Khan	19.11.1981	19.09.2001	Secretary UC	Adjusted from serplus Pool
29	Muhammad Khalid Khan	FA	10.01.1977	D.I.Khan	19.03.2004	19.03.2004	Secretary UC	
30	Kifayat Ullah	MA Islamiyat	13.05.1985	D.I.Khan	18.01.2005	18.01.2005	Secretary UC	
31	Muhammad Imran Sohail	B.Com	03.01.1984	D.I.Khan	14.04.2008	29.04.2008	Secretary UC	
32	Amin Ullah	FA	06.03.1982	D.I.Khan	01.05.2008	01.05.2008	Secretary UC	
33	Jawad ur Rehman	Matric	15.09.1980	D.I.Khan	02.05.2009	02.05.2009	Secretary UC	
34	Saif Ullah	FA	12.08.1983	D.I.Khan	10.07.2009	10.07.2009	Secretary UC	
35	Muhammad Hashim	BA	10.05.1980	D.I.Khan	19.07.2003	02.08.2012	Secretary UC	
36	Armaghan Sajeel	FA	01.01.1995	D.I.Khan	15.01.2013	15.01.2013	Secretary UC	

Assistant Director (Sr)
IG ARDD D.I.Khan

5/5/2017

Attested

60
60
20

Dist. Govt. NWFP-Provincial
District Accounts Office D.I.Khan
Monthly Salary Statement (February-2018)

2/2018 (8)



Personal Information of Mr FAROOQ AZAM d/w/s of MUHAMMAD AZAM KHAN

Personnel Number: 00185443 CNIC: 1730160033689 NTN:
Date of Birth: 01.04.1961 Entry into Govt. Service: 19.11.1981 Length of Service: 36 Years 03 Months 011 Days

Employment Category: Active Temporary

Designation: AGS DESIGNATION NOT RECON 80001663-DISTRICT GOVERNMENT KHYBE

DDO Code: DI6151-UNION COUNCILS DIKHAN

Payroll Section: 001 GPF Section: 010 Cash Center:

GPF A/C No: AGRI/DK00162 Interest Applied: Yes GPF Balance: 715,208.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 08 Pay Stage: 30

Wage type		Amount	Wage type		Amount
0001	Basic Pay	31,480.00	1000	House Rent Allowance	1,100.00
1300	Medical Allowance	1,500.00	2148	15% Adhoc Relief All-2013	802.00
2199	Adhoc Relief Allow @10%	546.00	2211	Adhoc Relief All 2016 10%	2,452.00
2224	Adhoc Relief All 2017 10%	3,148.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3008	GPF Subscription - Rs1070	-1,070.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-579.00	4004	R. Benefits & Death Comp:	-690.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
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Deductions - Income Tax

Payable: 5,469.30 Recovered till February-2018: 3,158.00 Exempted: 0.98 Recoverable: 2,312.28

Gross Pay (Rs.): 41,028.00 Deductions: (Rs.): -2,939.00 Net Pay: (Rs.): 38,089.00

Payee Name: FAROOQ AZAM

Account Number: 13590015546801

Bank Details: HABIB BANK LIMITED, 221359 CIRCULAR ROAD, D.I.KHAN. CIRCULAR ROAD, D.I.KHAN., D.I.KHAN

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: SHAHBAZ KHAILABDUL KHAILDIKHAN

City: D.I.KHAN

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: farooqazam448@gmail.com

Attested

(24)
DIRECTORATE GENERAL,
LOCAL GOVERNMENT & RURAL DEVELOPMENT
DEPARTMENT KHYBER PAKHTUNKHWA

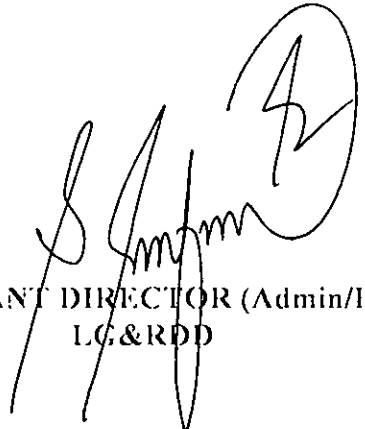
No. Director (I.G) 3-34/Complaints/2017
Dated Peshawar, the 5th June 2018

12433

The Assistant Director
I.G&RDD D.I.Khan.

Subject: APPLICATION

I am directed to refer to the subject cited above and to enclose herewith application of Farooq Azam Village Council Secretary r/o district D.I.Khan for information and with the request to submit detail report in the subject case.


ASSISTANT DIRECTOR (Admin/HR)
LG&RDD

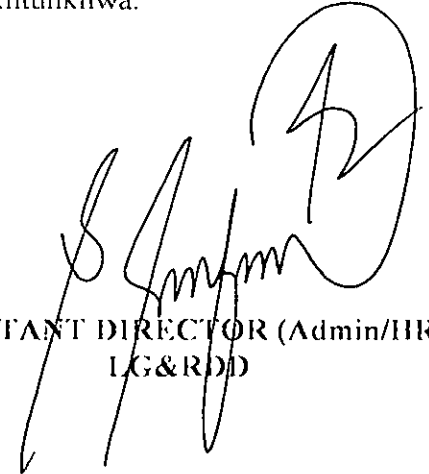
Copy No. & date even:

Copy forwarded to the:

1. PA to Director General, I.G&RDD, Khyber Pakhtunkhwa.

Attested

8951
28.5.2018
کری





ASSISTANT DIRECTOR (Admin/HR)
LG&RDD

~~03219-9-216-150~~

~~150~~

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50	  
ایڈوکیٹ: ASAD	<p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p>
بار کونسل ایسوسی ایشن نمبر: 0345912216	
رابطہ نمبر:	

بعدالت جناب: مرد میں تہمتوں کا **ASAD** لیٹر

منجانب: Rehta مادتی تہمت بنام دہلی گورنمنٹ	دعویٰ: علت نمبر: peh مورخہ: جرم: تھانہ:
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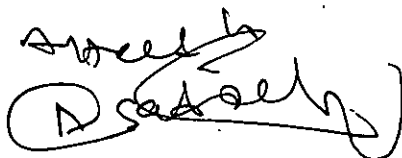
باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام۔ **جسٹس ایس۔ بی۔ ندیم ایس۔** کو مکمل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 و زوریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف سے یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظرتائی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جائے التوائے مقدمہ کے سب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم: **JESHAWAI ASSOCIATION KHAYBER**

appellant
مادتی (دعا)

العبد _____ واہ شد _____ العبد
مقام کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی نوٹو کاپی ناقابل قبول ہوگی۔


 Accepted & Accepted
 Accepted
 AT ASAD NABI ADVER

Before the honorable Service Tribunal RPK

FAROOQ KHAN vs DG Local Govt Form

Application for Transfer (NO-OBJECTION certificate)
The above titled case at
Dikhan Bench as jurisdiction
of D-I-Khan Bench Court
heard the Service appeal.

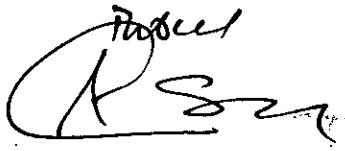
Respectfully Shere

- ① That the above titled Service appeal is pending / Submitted before this honorable Tribunal which in which no next date of hearing is yet fixed
- ② That In fact the matter pertain to Service of honorable bench of Dea - Ismail Khan is well authentic in fact the case

It is the case duly to acceptably Refer the case to D-I-Khan Bench.

appely

Dt 31-8-2018


Asst. Secy