

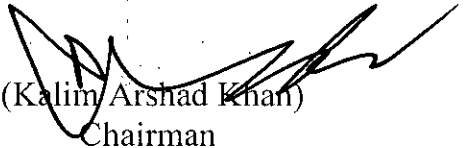
**ORDER:**


05<sup>th</sup> Oct, 2022

1. Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents and counsel for private respondent present.

2. Learned Additional Advocate General has pointed out that the appellant has been promoted vide order dated 19.08.2020 so the desired relief of promotion has been granted to him. Now the only grievance of the appellant, according to the learned counsel is that his promotion should be given effect from the date when his junior was promoted. It is in this respect observed that since he has not yet challenged the seniority list on the basis of which the promotion order dated 31.10.2018 was made, therefore, learned counsel submits that let him set the things right and make an representation to the respondents to correct seniority position of the appellant and his antedated promotion. Needless to say that he may do that and that is subject to the limitation. The appeal is disposed of in the above terms. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 5<sup>th</sup> day of October, 2022.*

  
(Kalim Arshad Khan)  
Chairman

  
(Farzha Paul)  
Member(Executive)

D.F.A

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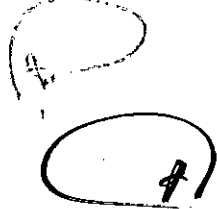
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(Kalim Arshad Khan)  
Chairman

(Fareeha Paul)  
Member(Executive)

28.06.2022

Learned counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General for official respondent No.1 & 3 present. Learned counsel for private respondent No.3 present and submitted copy of working paper alongwith Minutes of Departmental Promotion Committee held on 29<sup>th</sup> October, 2018 which is placed on file. Counsel for the appellant requested for adjournment in order to go through the record submitted today by the private respondent No.2. Adjourned. To come up for arguments on 11.08.2022 before the D.B.




(Rozina Rehman)  
Member (J)



(Salah Ud Din)  
Member (J)

11-8-2022 Proper DB not available the case is  
adjourned to 05-10-2022



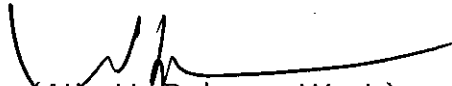
Reader


02.08.2021

Appellant in person present.

Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 09.12.2021 before D.B.


  
(Atiq-Ur-Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

09.12.2021

Counsel for the appellant, Mr. Kabirullah Khattak, Addl. AG for the official respondents and counsel for respondent No. 2 present.

During the course of arguments, it has been found expedient to direct the respondent department to produce the rules and method of recruitment of Class-IV servants as notified by the Government and the minutes of meeting of DPC in respect of the disputed promotion. To come up for arguments before the D.B on 08.03.2022.

  
(Salah-ud-Din)  
Member(J)

  
Chairman

8-3-22

*Due to retirement of the Honorable  
Chairman the case is adjourned to  
28-6-22*

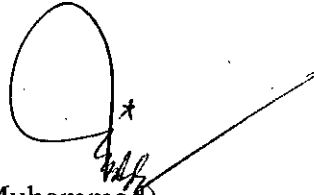
*Yusuf  
Reader*

25.11.2020

Counsel for the appellant present. Zara Tajwar, DDA for official respondents and counsel for private respondents No.2 present.

Learned counsel for the appellant states that the office/nomenclature of respondent No.3 is no more in existence due to merger of FATA. He, therefore, requests for substitution of the said respondent with that of Secretary Home and Tribal Affairs Government of Khyber Pakhtunkhwa.

The request appears to be reasonable in the circumstances of the case. The office is, therefore, required to delete respondent No.3 and insert Secretary Home and Tribal Affairs, Government of Khyber Pakhtunkhwa as one of the respondents. Necessary notice be issued to the impleaded respondent for submission of reply/comments on 29.01.2021 before D.B. The respondent No.1 shall also do the need full on or before the next date of hearing..



(Mian Muhammad)  
Member (E)



Chairman

29.01.2021

Due to Pandemic of Covid-19,  
The is adjourned to 14.04.2021 for the same

  
Reader

14.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 02.08.2021 for the same as before.



READER

21.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 17.07.2020 for the same. To come up for the same as before S.B.

  
Reader

17.07.2020

Junior to counsel for the appellant and Addl: AG for respondents present.

Written reply on behalf of respondents not submitted. Notices be issued to respondents for reply. Last opportunity granted.

Adjourned to 10.09.2020 before S.B.

  
(Mian Muhammad)  
Member(E)

10.09.2020

Appellant in person and counsel for private respondent No. 2 present. Nemo for respondent No. 1 & 3.

Learned counsel for respondent No. 2 has submitted reply to the appeal which is made part of the record. Respondent No. 1 & 3 have not preferred reply/comments despite last chance allowed on 17.07.2020. The matter is, therefore, posted to D.B for arguments on 25.11.2020. The appellant may furnish rejoinder to the reply/comments of respondent No. 2, within a fortnight, if so advised.

  
Chairman

19.02.2020

Junior counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for official respondents No. 1 & 3 and Mr. Sajjad Ahmad Mehsud, advocate on behalf of respondent No. 2 present and submitted Vakalatnama. Written reply on behalf of respondents not submitted despite last chance. Learned counsel for private respondent No. 2 requested for further time to furnish written reply/comments. Representatives of respondents No. 1 & 3 are also absent, therefore, notices be issued to respondents No. 1 & 3 with the direction to direct the representatives to attend the court and submit written reply on the next date. To come up for written reply/comments of all the respondents on 16.03.2020 by way of another last chance.

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

16.03.2020

Nemo for the appellant. Mr. Kabirullah Khattak learned Addl. AG for the respondents present. None present on behalf of official respondent No. 1 & 3 and private respondent 2 nor submitted written reply/comments therefore, fresh notice be issued to the official respondents No 1 & 3 and private respondent No. 2 for submission of written reply/comments. Another last opportunity is granted. To come up for written reply/comments on 21.04.2020 before S.B.

  
Member

25.10.2019

Appellant in person present. Mr. Kabirullah Khattak learned Addl: AG for official respondents present. Private respondent No.2 in person present.

Learned AAG as well as private respondent No.2 request for time to furnish requisite reply/comments. Granted. To come up for written reply/comments on 28.11.2019 before S.B.

  
Chairman

28.11.2019

Appellant in person, Addl. AG for official respondents and private respondent No. 2 in person present.

Respondents need further time to furnish the reply/comments. Adjourned to 09.01.2020 on which date reply/comments shall positively be submitted.

  
Chairman

09.01.2020

Appellant in person and Addl. AG and respondent No. 2 in person present. No representative of respondents No. 1 & 3 is available today.

Fresh notices be issued to respondents No. 1 & 3. To come up for written reply/comments of all the respondents on 19.02.2020 by way of last chance.

  
Chairman



26.06.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Naib Qasid) has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against promotion order dated 31.10.2018 of Class-IV namely Hamayoon Khan (respondent No.2) on the ground that Mr. Hamayoon Khan despite being junior to the appellant was promoted while ignoring the appellant.

Points urged need consideration. The present service appeal is admitted for regular hearing subject to all the legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 26.08.2019 before S.B

  
Member

26.08.2019

Appellant in person present.

Appellant submitted an application for extension of time to deposit security and process fee which have not been deposited within due time.

The application is allowed and appellant is permitted to deposit the requisite fee within three working days from today. Thereafter, notices be issued to the respondents for submission of written reply/comments on 25.10.2019 before S.B.

Appellant Deposited  
Security & Process Fee



26/8/19

  
Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 695/2019 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/05/2019	<p>The appeal of Mr. Inyat Ullah resubmitted today by Mr. Luqman Hakeem Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 24/5/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>26/06/19</u></p> <p> CHAIRMAN</p>
2-	27/05/19	


This is an appeal filed by Mr. Inayat Ullah today on 18/03/2019 against the order dated 31.10.2018 against which he preferred/made departmental appeal/ representation on 21.02.2019 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiency.

- 1- Annexures of the appeal may be attested.
- 2- Sub-rule-4 of rules-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that in every memorandum of appeal, the competent authority whose order is challenged shall be shown as respondent no.1.
- 3- Copy of impugned order is illegible which may be replaced by legible/better one.
- 4- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 439 /ST,


Dt. 19-3- /2019

  
REGISTRAR,  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Luqman Hakeem Adv. Pesh.

Resubmitted please

- (1) The period of 90 days has been lapsed today is 20-5-019 according to section 4 of the KPK Service Tribunal Act, 1974.
- (2) Annexures of the Appeal has been attested.
- (3) Sub-rule-4 of rules-6 of the KP service Tribunal rules 1974 has been followed & the competent authority whose order is challenged shown as Respondent No.1.
- (4) Copy of impugned order legible placed on file.
- (5) Two more copies/sets of the appeal along with Annexures complete in all respect has also been submitted with the Appeal.

  
Adv. A/Court  
Peshawar 23/5/2019.

Registrar  
KPK Service Tribunal  
Peshawar.

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

Appeal No. 695 of 2019

Inayat Ullah ... .. Appellant

**VERSUS**

(1) Deputy Commissioner Tribal Distt Mohmand,

(2) Hamayun Khan S/o Hukmat Khan Moharar BPS-V  
Deputy Commissioner Office at Ghalanai District  
Mohmand and others ... .. Respondents

**Index**

S.No.	Description of documents	Annexure	Pages
1.	Memo of appeal		1-3
2.	Affidavit		4
3.	Copy of appointment order	"A"	5
4.	Copy of impugned order dated 31/10/2018 <i>Appeal to D.C</i>	"B"	6 6A
5.	Copy of departmental appeal dt 21-2-2019	"C"	7
6.	Vakalat Nama	In original	8

Dated 14/03/2018

Appellant  
Through *[Signature]*  
**Luqman Hakeem**  
Advocate,  
High Court Peshawar  
Cell 0332-9268196

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Appeal No. 695 of 2019

Diary No. 348

Dated 18/3/2019

Inayat Ullah S/o Sabz Ali (Naib Qasid) Deputy  
Commissioner Office at Ghalanai Teshil & District  
Mohmand.

... .. Appellant

VERSUS

1- Deputy Commissioner, District Mohmand.

2- Hamayun Khan S/o Hukmat Khan Moharar BPS-V  
Deputy Commissioner Office at Ghalanai District  
Mohmand

3- Secretary Home and Tribal Affairs,  
Government of Khyber Pakhtunkhwa Peshawar.

3- ~~Secretary, Admin & Information FATA  
Secretariat, Khyber Pakhtunkhwa Peshawar.~~

... .. Respondents

APPEAL UNDER SECTION 4 OF KPK  
SERVICE TRIBUNAL ACT 1974 AGAINST THE  
IMPUGNED ORDER DATED 31/10/2018  
PASSED BY RESPONDENT NO. 2, 1 THE  
APPELLANT WAS NOT PROMOTED AS  
APPELLANT WAS SENIOR FROM THE  
RESPONDENT NO. 1 MORE THAN 5 YEARS  
IN SENIORITY LIST COMMUNICATED TO  
THE APPELLANT, THE IMPUGNED ORDER  
MAY BE SET ASIDE WITH IMMEDIATE  
EFFECT WHEREBY THE APPELLANT MAY  
KINDLY BE PROMOTED FROM THE POST  
OF NAIB QASID TO THE POST OF  
MUHARAR BPS- V.

Prayer;

On acceptance of appeal, the impugned  
order dated 31/10/2018 may be set aside and

vide order  
sheet dated  
25/11/2020

deleted

Filed to-day

Registrar

18/3/19

Re-submitted to-day  
and filed.

Registrar

24/5/19

*the appellant may be promoted tot he post of  
Muharar BPS - 5 with all back benefits for  
the best interest of justice.*

*Respectfully Sheweth;*

*Brief facts leading to the instant appeal are as  
under;*

- 1- That the appellant having been inducted in  
service as Naib Qasid on 12/04/2005. (Copy of  
appointment order is annexed as Annexure "A").*
- 2- That the appellant throughout his whole service  
has performed his duty with utmost of his  
capabilities and to the entire satisfaction of his  
superiors.*
- 3- That the departmental promotion committee  
unjustly recommended a junior to the appellant  
for the promotion as Muharar, which is illegal,  
against facts, seniority and law.*
- 4- That the respondent No. I has promoted illegally,  
malafidely and was not entitled for the said post  
whereas the appellant has the qualification of  
matriculation and 14 years experience in the  
department.*
- 5- That the appellant has filed representation dated  
21/02/2019 and no response has been received so*

far and 90 days have been elapsed and hence this appeal inter-alia on the following grounds:

**GROUND:**

- A- That the impugned order dated 31/10/2018 has been given retrospective effect which is patently an illegal order which cannot be given any effect to under the law and is liable to be set aside under the law.
- B- That the impugned order dated 31/10/2018 is illegal, malafide, without jurisdiction and without lawful authority and is liable to be set aside.
- C- That the appellant seeks leave of this Hon'ble Tribunal to rely on additional grounds at the time of arguments.

It is, therefore, prayed that on acceptance of instant appeal, the impugned order dated 31/10/2018 may be set aside and the appellant may be promoted to the post of Muharrar BPS - 5 with all back benefits for the best interest of justice.

Dated 14/03/2019

  
Appellant

Through

  
Luqman Hakeem  
Advocate,  
High Court Peshawar

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

Appeal No. \_\_\_\_\_ of 2019

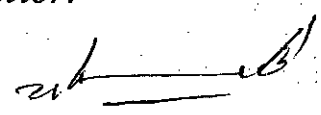
Inayat Ullah ..... Appellant

**VERSUS**

Hamayun Khan and others ... .. Respondents

**AFFIDAVIT**

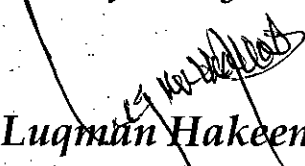
I, Inayat Ullah S/o Sabz Ali (Naib Qasid) Deputy Commissioner Office at Ghalanai Teshil & District Mohmand R/o Tapu Korona Dheri Kaley PO Ghari Sherdad Tehsil & District Peshawar do hereby solemnly affirm and declare on oath that the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and nothing wrong has been stated by me in the matter.

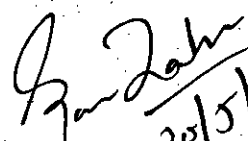


DEPONENT

CNIC # 17301-4242692-7

Identified by

  
Luqman Hakeem  
Advocate  
High Court, Peshawar

  
20/5/19  
ATTESTED  
Sania Zahra Advocate  
OATH COMMISSIONER  
Peshawar



"A" 57

Appointment order

**OFFICE OF THE POLITICAL AGENT MOHMAND AT GHALLANAI**

**OFFICE ORDER**

Mr. Inayat Ullah s/o Sabz Ali is hereby appointed as Naib Qasid in B.P.S -1 with usual allowance with effect from 12.4.2005 against the vacant post subject to the production of age and medical fitness certificate.

Political Agent Mohmands  
at Ghallanai

No 1785-89 Acctt:

Dated

Ghallanai

the 11-4/2005

Copy to :-

1. The Assistant Political Agent Baizai HQ.
2. The Assistant Political Upper Mohmands.
3. The Assistant Political Lower Mohmands.
4. Mr. Sabaz Ali Naib Qasid
5. AAO Mohmands

Political Agent Mohmands  
at Ghallanai

**ATTESTED**  
**Santa Zahra Advocate**  
**OATH COMMISSIONER**  
**Peshawar**

"B"

(b)

Impugned order



DEPUTY COMMISSIONER  
MOHMAND TRIBAL DISTRICT

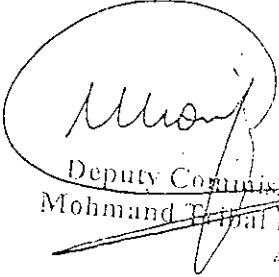
Phone No. 0924-290001 Fax No. 0924-290075 Email: pamohmand@gmail.com

ORDER

Dated Ghallanai the 31/10/2018.

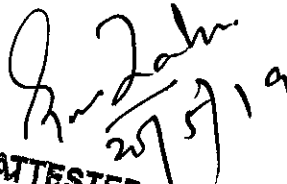
As recommended by Departmental Promotion Committee in its meeting held at Ghallanai on 29<sup>th</sup> October, 2018, the following Class-IV (BPS-4) (9900-410-23100) are hereby promoted to the post of Moharrir (BPS-5) (10260-500-26260) with immediate effect as per details given against each:-

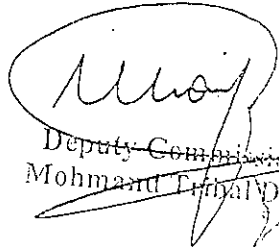
1. Mian Mekail son of Ghulam Rasool..
2. Mr. Hamayun Khan son of Hukmat Khan..

  
Deputy Commissioner  
Mohmand Tribal District

No. 9003-06 /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.

  
27/10/19  
**ATTESTED**  
**Santa Zahra Advocate**  
**OATH COMMISSIONER**  
**Peshawar**

  
Deputy Commissioner  
Mohmand Tribal District

محکمیت کا ڈیپٹی کمشنر صاحب ہند

Appeal To D-C

درخواست برائے پروموشن نائب قاضی ضلعی انسٹا میں علی  
عنایت اللہ ولد سید علی

جناب عالی

مردمانہ گزارش ہے کہ میں بطور نائب قاضی ضلعی انسٹا میں علی

میں جون 2002ء میں بھرتی ہوا۔ نہایت جانتہ فانی سے اپنی دیوی انجام دے رہا ہوں۔  
حال میں میں عدالت فور انائب قاضی کو پروموشن ہوئی ہے اس میں میرا حق تلفی  
ہو گیا ہے۔ میں ہر لحاظ سے پروموشن کا حق دار تھا لیکن میرے جونیئر ہمایوں ولد  
حکومت جون 2009ء میں بطور عدالت فور بھرتی ہوا ہے تو پروموشن دیکر بطور صدر  
پروموشن دی گئی ہے۔ جو میرے اور سینیئر کے سراسر خلاف درزی کی گئی ہے  
لہذا آپ صاحبان سے یہ درخواست ہے کہ مذکورہ تعیناتوں اور  
پروموشن کا از سر نو جائزہ لیکر مجھے اپنا حق دینے اور پروموشن کے اظہار  
میں

عین گزارش ہو

القاضی

درخواست گزار

عنایت اللہ ولد سید علی

نائب قاضی ضلعی انسٹا میں علی

ہند (9123728)

Acct:

D/S

DC/M  
28/01/2019

Santa Zahra

ATTESTED  
Santa Zahra Advocate  
OATH COMMISSIONER  
Peshawar

463 Acct  
28/01/19

محکمہ جہاز سیکرٹری ایڈمنسٹریشن اینڈ انفارمیشن ٹیکنالوجی

Department Appeal

درخواست برائے ہر دو ٹوٹن کو فوری  
ضلعی انتظامیہ منسوخ

جنگل عالی

بیمہ خورد بانڈ زارشی ہے کہ میں جہاز نامہ قاعدہ 2005

میں پولیٹیکل انتظامیہ منسوخ کیجئے میں بھرتی ہوا۔ بیمہ ایواندار کے

ذریعہ انجام دے رہا ہوں۔ حال ہی میں ملازم فور انامٹ قاعدہ کا ہر دو ٹوٹن ہوا

جس سے سینیٹا ریٹی کو بلیک نظر انداز کیا گیا۔ ہمایون ولد حکومت جو کہ 2009

میں ضلعی انتظامیہ نے آفس میں جہاز ملا سافر بھرتی ہوا ہے وہ ہر دو ٹوٹن دیگر

جہاز منسوخ بھرتی کیا گیا جبکہ میں 2005 میں بھرتی ہوا ہوں اور مجھے ہر دو ٹوٹن

میں رہا گیا۔ میری حق تلفی ہو گئی ہے۔

لینڈا میں التماس کرتا ہوں کہ مذکورہ آرڈر وکینس کیا جائے اور مجھے

جہاز منسوخ ہر دو ٹوٹن رہنے کے احکام صادر فرمائیں۔  
عنايت نامہ قاعدہ

Handwritten signature

27/5/19

ATTESTED  
Santa Zahra Advocate  
OATH COMMISSIONER  
Peshawar

Post Office is not responsible for loss of insured articles in the country as to binding upon every article by virtue of this Post Office Act 1911.

قیمت 50 روپے	6341			
ایڈوکیٹ: 		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل/ایسوسی ایشن نمبر: HCR-57444				
رابطہ نمبر: 0332-9268196				

بعدالت جناب: صیر حسین صیر پختونخواہ سروسز ٹریڈنگ کمپنی پشاور

دعویٰ:	منجانب: عیادت اللہ
علت نمبر:	
مورخہ:	دعویٰ سناری
جرم:	
تھانہ:	پیروشن

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
آن مقام پشاور کیلئے لنجان حکیم ایڈووکیٹ کو وکیل 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 تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
کاروائی 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 باختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا  
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب 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: 12-03-2019

الع گواہ شد الع

مقام پشاور کے لیے منظور ہے۔

## وکالت نامہ

بعدالت حدیث  
عناستہ اللہ  
بنام DC سید وسیر  
مخانب (2) Respondant no دعویٰ اجرم (matter)  
تھانہ ایف آئی آر تاریخ

### باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام

امین الرحمن یوسفزئی ایڈووکیٹ ہائی کورٹ فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈووکیٹ ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بزدور تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ ساعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختمہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد تالیف و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتھنامی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند رہے مورخہ 19/2/20 مضمون مختار نامہ سن لیا ہے اور ایسی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED:

Amin ur Rehman Yusufzai  
Advocate High Court  
&

Federal Shariat Court of Pakistan  
CNIC: 17301-5813582-3  
Cell No. 0321-9022964  
BC-10-7562

Sajjad Ahmad Mehsud  
Advocate High Court  
Peshawar

Adv. Khahel Khan

BC-18-115

سجاد احمد محسود

To

The Chairman

HPK - Service Tribunal

Peshawar.

Imayatullah v/s D.C. Muhammad

Subject: Request for extension of Security Charge

Respected Sir

It is submitted that the Appellant was informed about Security Charges but the same has not been Paid. Kindly extend the time for submission of the charges. I shall be highly obliged.

Dated: 26-8-2019

Yours Faithfully

Imayatullah

Through

Imam Hakeem  
Advocate

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

In Re:

Service Appeal No. 695 of 2019


Inayat Ullah. .... Applicant/Appellant

**....VERSUS....**

Hamayun Khan & 02 others. .... Respondents

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S. No.	Description of documents	Annex	Pages
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3.	Copy of Office Order dated: 14.11.2008	B	5
4.	Copy of seniority list dated: 11.12.2012	C	6
5.	Copies of commendation certificates	D	7-13
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7.	Copies of Matriculation Certificate alongwith Service Book	F	15-30

  
Respondent No.1/Hamayun Khan

Through

Amin ur Rehman Yusufzai

Sajjad Mehsud

&

  
Khalid Khan

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar

0321-9022964, 0333-9981464 & 0342-9101124

Dated: 10.03.2020



(1)

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

In Re:

Service Appeal No. 695 of 2019

Inayat Ullah..... Applicant/Appellant

**....VERSUS....**

Hamayun Khan & 02 others..... Respondents

**WRITTEN REPLY FOR AND ON BEHALF OF**  
**RESPONDENT NO.1/ HAMAYUN KHAN.**

**Respectfully Sheweth:**

**TRUE FACTS OF THE CASE:**

1. That the answering Respondent passed matriculation examination from the Board of Intermediate & Secondary Education (BISE) Peshawar in the year 2001.  
**(Copy of SSC Certificate is attached as Annexure "A").**
2. That answering respondent has been appointed as Naib Qasid (BPS-2), by the competent authority, in due course of law, vide Office Order dated: 14.11.2008.  
**(Copy of Office Order dated: 14.11.2008 is attached as Annexure "B").**
3. That seniority list of the matriculate class-IV employees of the office of the then Political Agent, now Deputy Commissioner, Mohmand has been prepared / issued, by the competent authority, on 11.12.2012, wherein name of the answering respondent is at Serial No.3.  
**(Copy of seniority list dated: 11.12.2012 is attached as Annexure "C").**
4. That the answering respondent always performed duties with zeal, devotion and utmost satisfaction of his superiors and his outstanding performance has always been appreciated by the concerned quarters, evident from numerous commendation certificates (7 in Nos).  
**(Copies of commendation certificates are attached as Annexure "D").**
5. That the competent authority, on the recommendations of the Departmental Promotion Committee (DPC), promoted the answering respondent alongwith another, to the post of Moharar (BPS-5), vide order dated: 31.10.2018, on the strength of performance-cum-seniority list dated: 11.12.2012.  
**(Copy of order dated: 31.10.2018 is attached as Annexure "E").**

**PRELIMINARY OBJECTIONS:**

1. That order dated: 31.10.2018, impugned in the titled appeal has been questioned in Departmental Appeal dated: 28.01.2019 i.e. after about 90 days, hence barred by time.

- 2. That order dated: 31.10.2018 supra, is with regard to promotion of the answering respondent and Mian Mikael S/O Ghulam Rasool, however, the later has not been impleaded in the panel of Respondents although he is necessary party hence the titled appeal is hit by mis-joinder and non-joinder.
- 3. That appellant has neither cause of action nor locus standi to challenge order dated: 31.10.2018, as the same has been issued, by the competent authority, on the strength of seniority list dated: 11.12.2012, wherein name of Petitioner is nowhere mentioned, needless to add that the said seniority list has never been objected by the appellant in due course of time.
- 4. That appellant has deliberately suppressed material facts i.e. seniority list etc., from this Hon'ble Tribunal thus did not approach with clean hands which disentitle him for the desired relief.
- 5. That the seniority list for the post of Moharar was prepared by the competent authority amongst the matriculate class-IV employees in the year 2020, while the appellant has been matriculated in the year 2014, that too, without either permission of the competent authority or entry in his Service Book, therefore, on this score too, the titled appeal is not maintainable.  
**(Copies of Matriculation Certificate alongwith Service Book are Annexure "F").**

**REPLY ON FACTS:**

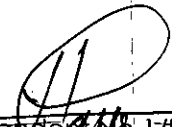
- 1. Not related, hence needs no reply.
- 2. Not related, hence needs no reply.
- 3. Misleading as laid, hence denied. Moreover, name of the appellant is not reflecting from the seniority list dated: 11.12.2012, prepared/issued by the competent authority, for onward promotion to the post of Moharar, while name of answering respondent is reflecting from Serial No.3 whereof and was eligible from all aspects, hence has rightly been promoted.
- 4. Misleading as laid, hence denied. Moreover, the appellant was not eligible for promotion to the post of Moharar not only because his name is not reflecting the seniority list dated: 11.12.2012 but also because he passed matriculation examination in the year 2014, that too, without entry in Service Book.
- 5. Misleading as laid, hence denied. Moreover, departmental appeal of the appellant has been received in the office of concerned quarters on 28.01.2019, instead of 21.02.2019, which was badly time barred, hence not entertained and similar is the case with the titled appeal, hence deserves to be set at naught.

**ON GROUNDS:**

- A. Misleading as laid, hence denied. Moreover, the answering respondent alongwith another has bene promoted vide order dated: 31.10.2018, with immediate effect.

- B. Misleading as laid, hence denied. Moreover, appellant has badly failed to substantiate his stance with cogent/documentary evidence.
- C. In view of facts and circumstances of the case, request of appellant for agitating additional grounds at the time of arguments is not entertain-able, moreover, the answering respondent, with the permission of this Hon'ble Tribunal, will take any other ground at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant written reply, the titled appeal may be dismissed with exemplary cost in the best interest of justice and equity.

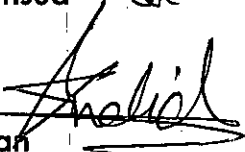
  
Respondent No. 1/Hamayun Khan

Through

Amin ur Rehman Yusufzai 

Sajjad Mehsud 

&


  
Khalid Khan  
Advocates, Peshawar,  
3-A, Park Avenue, Bheftani Plaza,  
University Town, Peshawar  
0321-9022964, 0333-9981464 & 0342-9101124

Dated: 10.03.2020

**AFFIDAVIT**

I, do hereby solemnly affirm declare on oath that the contents of the accompanying **Written Reply** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



2020   
Deponent

S.No. 197535

Roll No. 42906



Board of Intermediate and Secondary Education  
Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination  
SESSION 2001-SUPPLEMENTARY  
(Humanities Group)

Attested

This is to Certify that Hamayun Khan Son / Daughter of Hukmat Khan  
and a resident of Mohmand Agency has passed the Secondary School Certificate  
Examination of the Board of Intermediate and Secondary Education, Peshawar held in September, 2001 as a Private  
candidate. He / She obtained 366 Marks out of 850 and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

- |            |                     |                    |                    |
|------------|---------------------|--------------------|--------------------|
| 1. English | 3. Islamiyat        | 5. Mathematics     | 7. Islamic Studies |
| 2. Urdu    | 4. Pakistan Studies | 6. General Science | 8. Pashto          |

Date of birth according to admission form June 07, 1985

  
Asst. Secretary

  
Secretary

This certificate is issued without alteration or erasure.

Annexure

(B)

(5)

OFFICE OF THE POLITICAL AGENT MOHMAND AGENCY AT  
GHALLANAI.

OFFICE ORDER.

Mr. Humayun Khan Son of Hukumat Khan Halimzai is hereby appointed as Naib Qasid BPS-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 lieu thereof.

Political Agent Mohmand  
at Ghallanai.

No. 4820-23/Acctt:

Dated Ghallanai the 14/11/2008

Copy to:-

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

Political Agent Mohmand  
at Ghallanai.

Attested

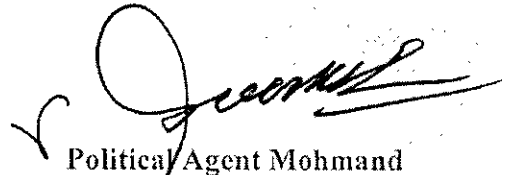
Annexa

(C)

(B)

SENIORITY LIST OF MATRICULATE CLASS IV OF THE OFFICE OF POLITICAL  
AGENT MOHMAND AS IT STOOD ON 11/12/2012

S.No	Name of Official/Post held /BPS	Education Qualification	Date of 1st entry into Service	Date of Promotion/Appointment against present post	Date of birth/Domicile	Method of Recruitment
1.	Mr. Mekaeel Khan Naib Qasid	Matric	14/01/2004	14/01/2004	01/01/1979 Mohmand Agency	Initially recruited
2.	Mr. Sher I Khan Behishti	Matric	01/09/2004	01/09/2004	15/03/1975 Mohmand Agency	Initially recruited
3.	Mr. Hamayun Khan Naib Qasid	Matric	14/11/2008	14/11/2008	07/06/1985 Mohmand Agency	Initially recruited
4.	Mr. Sarmast Khan Naib Qasid	Matric	09/03/2009	09/03/2009	03/01/1987 Mohmand Agency	Initially recruited
5.	Mr. Waqar Ul Hassan Naib Qasid	Matric	08/12/2009	08/12/2009	18/11/1973 Mohmand Agency	Initially recruited

  
Political Agent Mohmand  
at Ghallanai

Attested  


OFFICE OF THE ASSISTANT POLITICAL AGENT UPPER MOHMAND



CERTIFICATE OF APPRECIATION

In Appreciation of your untiring efforts on occasion of Haji Turangzai Rohani Ghwanda at Ghazi Abad Tehsil Safi, Hussni-e-Qirat, Mohmand Levy Passing out organized by Political Administration at Ghallanai Tehsil Halimzai and 1st Governor Tour de Mohmand Cycle Race in chairmanship of Zeeshan Abdullah Assistant Political Agent Upper Mohmand.

Mr. Hamayun Khan (Assistant to Steno)

In recognition of your tireless effort and constant support of our activities signed this day by the duly authorized officer.

*Zeeshan*  
Assistant Political Agent  
Upper Mohmand Sub-Division  
Ass. Political Agent  
Upper Mohmand and Ghallanai

*Attested*

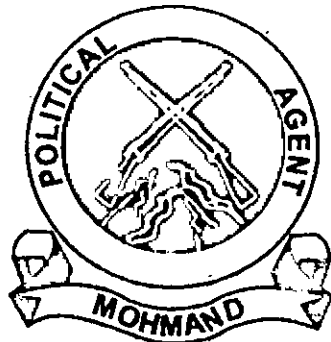
2015

Amreya

(D)

(7)

POLITICAL AGENT MOHMAND AGENCY



Certificate of Appreciation

Presented to

Mr. Hajji Sahib Turangzai

In Recognition of His Service in Organizing

Haji Sahib Turangzai Anniversary

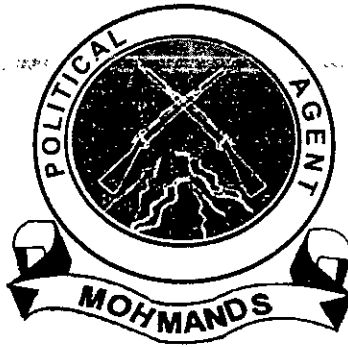
On Saturday, April 18th, 2015

Attested  
/s/

Waqar Ali Khan  
Political Agent  
Mohmand Agency







# Certificate of Appreciation

*Presented to*

M. Y. HAMYUN KHAN

*Providing their Services to Organize / Manage*

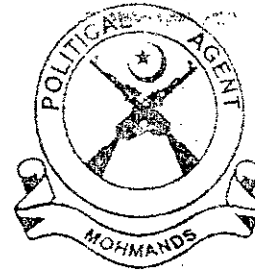
## Mohmand Sports Festival 2015

*Monday, March 23rd, 2015*

*Waqar Ali Khan*

**WAQAR ALI KHAN**  
Political Agent  
Mohmand Agency

*Attested*



# Certificate of Excellent Appreciation

Presented to

10  
Mr. Hamayun Khan, Assistant to Sero.

Attestad for

For The Best Participation in  
**Jashne Azadi Mela 2016**

Mahmood Aslam Khan  
Political Agent  
Mohmand Agency

POLITICAL AGENT



**Certificate of  
Excellent Participation**

Presented to

Hamayun Khan

For the Best Participation in  
**2nd Mohmand Sports Festival 2016**

2nd Mohmand  
Sports Festival  
2016



2nd Mohmand  
Sports Festival  
2016



*Mahmood Aslam Khan*  
**Mahmood Aslam Khan**  
Political Agent Mohmand Agency



Wednesday  
March 23-2016

*Attested*



**OFFICE OF THE POLITICAL AGENT  
MOHMAND AGENCY**

Ph: 0924-29001-2, Fax: 0924-290075  
E-mail: [panohmand@gmail.com](mailto:panohmand@gmail.com)

(12)



3602-07 /PAM/S

Date 7/8/2017

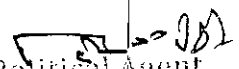
To: (Mr. Hamayun Khan),  
Assistant to Steno P.A Mohmand Office.

Subject: APPRECIATION LETTER

I have been pleased to convey that successful conduct of the events of 14<sup>th</sup> August Independence Day, because of you and your team's dedicated and splendid performance despite dual charge. The whole process was efficiently managed and well organized.


The undersigned appreciates your devoted efforts and excellent performance and will hope to continue with the same spirit for such like event in future.

Please convey my heartfelt appreciation to all members of your team. May ALLAH grant us even greater ability and courage to serve our people earnestly and devotedly.

  
Political Agent  
Mohmand Agency

Cc.

1. Commissioner Peshawar Division Peshawar.
2. All APAs in Mohmand Agency.
3. Superintendent Main Office Ghallanai

Attested  


CONFIDENTIAL

13



Officer Commanding 206 Survey Sector  
Mohmand Agency  
Tel: 0924290072  
PF-1XDESN-16  
15 December 2017

To : Mr Mehmood Aslam Wazir  
Political Agent Mohmand Agency

Respected sir.

I hope this letter of mine will find you in the best of your health and spirit. Its been a half a year of mine, here in Mohmand Agency as in-charge Military Intelligence. During this tenure we not only apprehended many anti state elements but also got many hardcore terrorists surrendered to Govt of Pakistan. Alhamdulillah today we stand tall amongst other colleagues of my setup because of the achievements and successes we got in Mohmand Agency. All successes and achievements are result of team work and great cooperation of all the stake holders of Mohmand Agency. I must highlight and say with lot of thanks that it couldn't not have been possible without your constant support and guidance. Whenever my office needed your assistance in any shape, you were right there to hold us up. It will also be highly unfair if I don't mention the restless and timely help and cooperation of your staff especially ex APA Hameedullah Khattak, SDO Tariq, Mr Shah Mehmood, SM (Levies) Kareem Ullah and Mr Hamayun Khan. Our sincere thanks to all of them for their priceless contribution for my setup which is directly related to bringing peace in Mohmand Agency.

With the hope that this cooperation and coordination with go long way and also bring peace and stability in Mohmand Agency.



(Your's Truly)

CONFIDENTIAL

*Attested*  
*pu*



Annexa (E)

(19)

**DEPUTY COMMISSIONER  
MOHMAND TRIBAL DISTRICT**

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

Dated Ghallanai the 31/10/2018.

**ORDER**

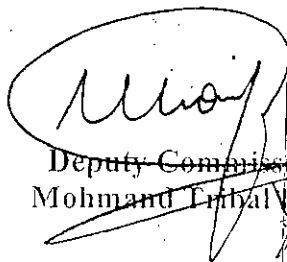
As recommended by Departmental Promotion Committee in its meeting held at Ghallanai on 29<sup>th</sup> October, 2018, the following Class-IV (BPS-4) (9900-440-23100) are hereby promoted to the post of Moharrir (BPS-5) (10260-500-26260) with immediate effect as per details given against each:-

1. Mian Mekail son of Ghulam Rasool.
2. Mr. Hamayun Khan son of Hukmat Khan.

  
Deputy Commissioner  
Mohmand Tribal District

No. 9003-06 /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

Attested



Annexure

(F)

(15)

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

Name: Mr. Inayatullah

Deputy Commissioner  
Mohmand Tribal District

Race: Islam


Residence: Dehrai Kalli, P.O. Gauri Sher Pad T.D.D

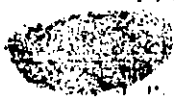
Father's name and residence: Sabz Ali


Date of birth by Christian era as nearly as can be ascertained: 04-04-1981


Exact height by measurement: 5.7'


Personal marks for identification: Handwritten marks

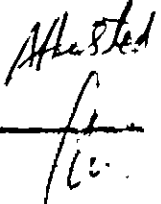
Left hand thumb and finger impression of (Non-Gazetted) officer: 

Little Finger  Ring Finger

Middle Finger  Fore Finger

Thumb 

9. Signature of Government Servant: 

10. Signature and designation of the Head of the Office, or other Attesting Officer:   
POLITICAL AGENT  
MOHMAND AGENCY

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 Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment.	Signature of the person testing the Government Sans 1 to
BPS-I			Rs. 1870/-				
1870-55-3520							
BPS-1			Rs. 2150/-				
2150-65-4100							
BPS-1			Rs. 2215/-			1/12/2005	
2150-65-4100							
BPS-1			Rs. 2280/-			1/12/2006	
2150-65-4100							
BPS-2			Rs. 2700/-				Attested: /u



8 Designation of the office posting officer Signature of Government Sps 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punish- ment or censure or praise of the Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government			
					Period			Government to which debitabale
			APPOINTED as Naib Qasid					
			13 PS-I with effect from					
			11/04/2005 vide P.A. Mohiuddin					
			order No 1785-89 Act dt, 11/04/2005					
			Pay fixed in the revised pay scale.					
			Granted annual increment					
			Granted Annual increment					
			Revised APS 2007					

Attested  
/s/

18

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 Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant
BPS-2			Rs 2785			1/12/2007	
2530-85-5080							
BPS-2			Rs 3235/-				
3085-100-8035							
BPS-2			Rs 3335/-			1/12/2008	
3085-100-8035							
BPS 2			Rs 3435			1/12/2009	
3085-100-8035							Attested
BPS. 2			Rs 3535			1/12/2010	
3085-100-8035							

3 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any records, punishment or conditions of service of Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government			
					Period			Government to which payable
							Granted Annual increment.	
							Pay fixed vid revised Basic Pay 2008	
							Granted Annual increment.	
							Granted Annual increment.	
							Granted Annual increment	
							Attested <i>[Signature]</i>	

20

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "p"	7 Date of appointment	8 Signature of Government Servant
BPS-2	4900-170-10000	Rs	5920/-				
BPS-2	4950-170-10000		Rs 6090/-			1/12/2012	
BPS-2	4900-170-10000		Rs 6260/-			1/12/2012	
BPS-2	4900-170-10000		Rs 6430/-			1/12/2013	
BPS-2	4900-170-10000						Attested /G

9	10	11	12	13		14	15	
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	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		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government			
					Period			Government to which debitible
Pay fixed vide revised BPS 2 (2011)								
Granted Annual increment.								
Granted Annual increment.								
Granted Annual increment.								
Granted Annual increment.								
Granted Annual increment.								
Granted Annual increment.								
<div style="display: flex; justify-content: space-between;"> <div style="width: 20%;"> <p>IA 23 23/11/15</p> </div> <div style="width: 60%;"> <p>Down Rs 3285/- and c of arrears and gratification for BPS 2 to 4 from 1/11/15 to 16/11/15</p> </div> <div style="width: 15%; text-align: right;"> <p>Attested /s/</p> </div> </div>								
<p style="text-align: center;">23/11/15 A.A.V. /s/</p>								

BUNDESGOV

Ref: 37158  
 ARTS

# PESHAWAR

EDUCATION

PROVISIONAL AND DETAILED MARKS CERTIFICATE  
 SECONDARY SCHOOL CERTIFICATE EXAMINATION  
 SEPTEMBER 2014

22

City: \_\_\_\_\_ District: \_\_\_\_\_  
 PESHAWAR DISTRICT  
 Date: September 2014 Student Type: Private Student

Serial	Marks	MARKS OBTAINED				Total	Grade
		Page A	Page B	Page C	Page D		
1	150	25	-	49	-	74	C
2	150	40	-	55	-	95	B
3	100	19	-	20	-	39	D
4	100	30	-	35	-	65	C
5	150	41	-	25	-	66	C
6	150	32	-	33	-	65	C
7	150	30	19	29	26	104	B
8	150	41	-	48	-	89	C

Total: 1100

ECG

Remarks

Date of Birth: \_\_\_\_\_  
 Error: \_\_\_\_\_  
 Checked by: \_\_\_\_\_  
 Issue Date: 7-11-2014

1159

Control of Examination

*Attested*

(For use in Police Department only)

23

Heirs:

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

Left Thumb Impression

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L. Or B.A.	
Jrdu		Pleadership examiantion	
Plan-drawing		Training School Final examiantion	
Finger Print		Other qualification:	
Drill Instructing		Matric on 15-11-2003	
our Duties			
eserve Duties			

Attested

Deputy Commissioner  
Mohmand Tribal District

N.B.— Line to be drawn under the qualification possessed.

Attested  
[Signature]

24

Note: The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name: Hamayun Khan

2. Race: Mohmand

3. Residence: Babi Khel P/O Tehsil Ghallanai Upper Mohmand Agency

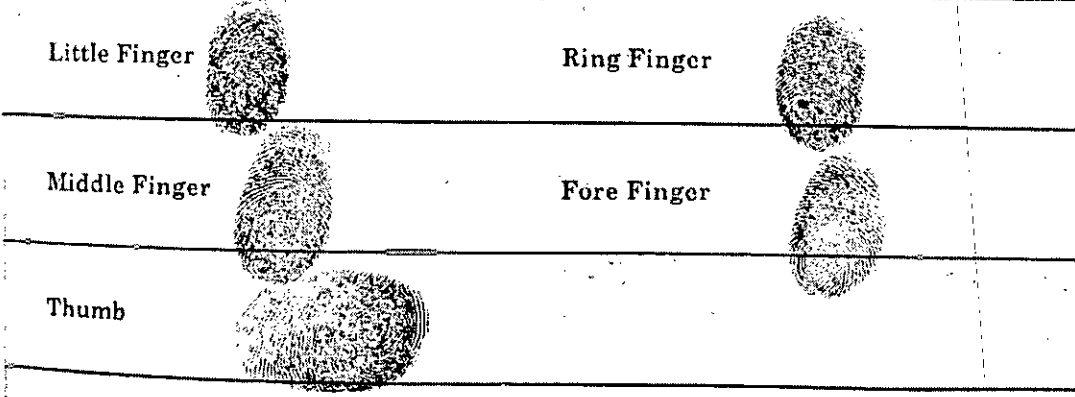
4. Father's name and residence: Hukmat Khan


5. Date of birth by Christian era as nearly as can be ascertained: 07-06-1985

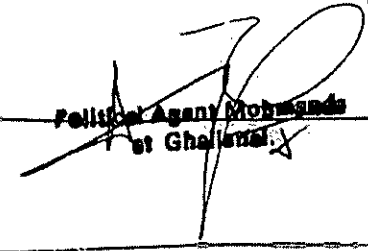
6. Exact height by measurement: 5-6

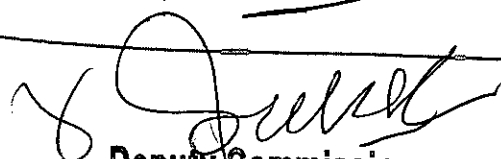
7. Personal marks for identification: Scar on left eyebrow


8. Left hand thumb and finger impression of (Non-Gazetted) officer:




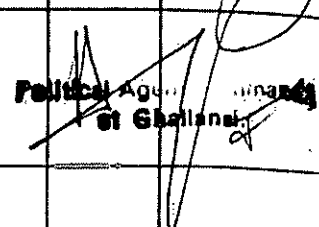
9. Signature of Government Servant: 

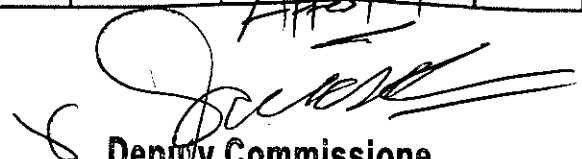
10. Signature and designation of the Head of the Office, or other Attesting Officer.   
Political Agent Mohmand Agency Ghallanai

Attested  
  
Deputy Commissioner  
Mohmand Tribal District

Attested  





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 Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant
3035-100-6035 Naib Qasid Bps-2			3035/-			14-11-2008	
3035-100-6035 Naib Qasid Bps-2			3135/-			31 <sup>12</sup> / <sub>2009</sub>	
3035-100-6035 Naib Qasid Bps-2			3235/-			31 <sup>12</sup> / <sub>2010</sub>	
4900-170-10000 Bps-2			5240/-			01 <sup>7</sup> / <sub>2011</sub>	
-do-			5410/-			1 <sup>12</sup> / <sub>2011</sub>	

Attested  
  
 Deputy Commissioner  
 Mohmand Tribal District

Attested  

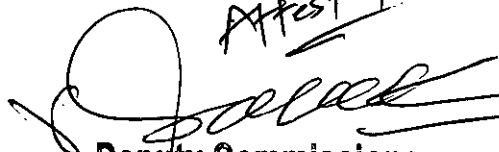

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	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.	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant
Political Agent Mohmands at Ghallani	14-11-2008				Appointed as Naib Qasid BPS-2 with effect from 14-11-2008 vide Pa Mohmand order NO B20-23/1000 dated 14/11/2008.		
Political Agent Mohmands at Ghallani						Political Agent Mohmands at Ghallani	
Political Agent Mohmands at Ghallani	30 <sup>11</sup> / <sub>2009</sub>				Service verified upto 30 <sup>12</sup> / <sub>2009</sub> from the office copies of Pay bills.		
Political Agent Mohmands at Ghallani						POLITICAL AGENT Mohmand Agency Shallam	
Political Agent Mohmands at Ghallani	30 <sup>11</sup> / <sub>2010</sub>				Service verified from 1 <sup>10</sup> / <sub>2009</sub> To 30 <sup>11</sup> / <sub>2010</sub> from office copies of Pay bills.		
Political Agent Mohmands at Ghallani						Political Agent Mohmands at Ghallani	
Political Agent Mohmands at Ghallani		Revision of Basic Pay scale					
Political Agent Mohmands at Ghallani							
Political Agent Mohmands at Ghallani	30 <sup>11</sup> / <sub>2011</sub>	Annual increment			Service verified from 01 <sup>11</sup> / <sub>2010</sub> to 30 <sup>11</sup> / <sub>2011</sub> from office copies of Pay bills.		
Political Agent Mohmands at Ghallani						Political Agent Mohmands at Ghallani	

Attested  
  
 Deputy Commissioner  
 Mohmand Tribal District

Attested  


27

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 Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant
6900-170-10000 Bps-2			5580/-			1/12/2012	
<del>do</del>			5750/-			07/12/2015	
<del>do</del>			5920/-			07/12/2014	
6335-220-12936 Bps-2			7655/-			01/7/2015	
6730-300-15730 <del>do</del> Bps 4			8230/-			01/7/2015	

*Attested*  
  
 Deputy Commissioner  
 Mohmand Tribal District

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*Attested*  


9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	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.	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
30/11/2012 <del>Political Agent Mohmand Agency</del>		Annual increment	<del>Political Agent Mohmand Agency</del>				Service verified from 01/12/2011 to 30/11/2012 from office copies of pay bills.
30/11/2013 <del>Political Agent Mohmand Agency</del>		Annual increment	<del>Political Agent Mohmand Agency</del>				Service verified from 01/12/2012 to 30/11/2013 from office copies of pay bills.
30/11/2014 <del>Political Agent Mohmand Agency</del>		Annual increment	<del>Political Agent Mohmand Agency</del>				Service verified from 01/12/2013 to 30/11/2014 from office copies of bills.
13/11/16 Revision of Basic pay scale 2015		3185/- upgradation from BPS 2 to 4 w.e.f 01/11/15 to 10/15					Top Scale up gradation wide No - PD/50(FR)7-20/2015 dated 30/6/2015

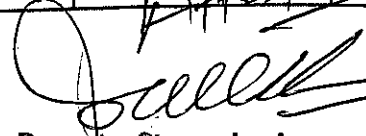
Attested  
  
 Deputy Commissioner  
 Mohmand Tribal District

Scanned by CamScanner

Attested  


29

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 Art. 374 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant
6730-300-15730 Bps-4			8530/-			12/01/2015	
8280-370-19380 Bps-4			10580/2			07/2016	
8280-370-19380 Bps-4			10870/-			12/07/2016	
9900-440-23100 Bps-4			12980/-			07/2017	
9900-440-23100 Bps-4			13420/-			07/2017	
10260-500-25260 Bps-5 Moharri			14260/-			31/10/2018	

*Attested*  
  
 Deputy Commissione  
 Mohmand Tribal District

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*Attested*  


9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government.		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	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.	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				30/11/2015 <i>[Signature]</i> Political Agent Mohmand Agency			
		Revision of Basic pay scale 2016 w.e.f 01/07/2016 <i>[Signature]</i> Mohmand Agency					
30/11/2016 <i>[Signature]</i> Political Agent Mohmand Agency		Annual increment: <i>[Signature]</i> Political Agent Mohmand Agency		Service notified from 01/12/2015 to 30/11/2016 from office copies of pay bills. <i>[Signature]</i> Political Agent Mohmand Agency			
		Revision of basic pay scale 2017 w.e.f 01/07/2017 <i>[Signature]</i> Political Agent Mohmand Agency					
30/11/2017 <i>[Signature]</i> Political Agent Mohmand Agency		Annual increment: <i>[Signature]</i> Political Agent Mohmand Agency		Service notified from 01/12/2016 to 30/11/2017 from office copies of pay bills. <i>[Signature]</i> Political Agent Mohmand Agency			
		Promoted to the post of Motarri vide order No 9003-06 dated 31/10/2018. <i>[Signature]</i> Deputy Commissioner Mohmand Tribal District					

*[Signature]*  
Deputy Commissioner  
Mohmand Tribal District

Scanned by CamScanner

*[Signature]*  
Attested

Oct, 2018

## WORKING PAPER

Subject: PROMOTION ON REGULAR BASIS TO THE POSTS OF ASSISTANT BPS-16, SENIOR CLERK BPS-14, JUNIOR CLERK BPS-11, MOHARRIR BPS-5, APPOINTMENT OF MR. NASEEM SHAH LEVY SEPOY BPS-5 AS JUNIOR CLERK BPS-11 IN THE OFFICE OF POLITICAL AGENT MOHMAND AGENCY AS PER JUDGMENT OF PESHAWAR HIGH COURT PESHAWAR DATED 28.3.2017 AND APPOINTMENT OF MR. ASGHAR ALI S/O LATE GOHAR ALI EX- SENIOR CLERK AGAINST DECEASED SONS QUOTA

- 03 Posts of Assistant BPS-16 are lying vacant due to retirement of Mr. Yar Muhammad and Zahir Gul and 01 newly created post, as per letter received from Deputy Secretary (LK&B), Law & Order Department, FATA Secretariat vide letter No.F.1(6)-LK/2008-1,1 dated 1<sup>st</sup> January 2018.

- In terms of S.No.6, Column 5 of the appendix attached with Government of NWFP Revenue and Estate Department Notification No.5869/Admn-11/1/269 amended dated 13.6.2006 (**Annexure-A**) the method of recruitment has been prescribed for filling up the post of Senior Clerks as following:-

- Seventy five percent (75%) by promotion on the basis of Seniority-cum-fitness, from amongst the Senior Clerks with at least five years service as Junior Clerk / Senior Clerk and
- 25% by initial recruitment.

- According to the seniority list vide **Annexure-B** presently there are 09 Senior Clerks on the cadre strength of this office (6 posts filled 3 vacant). The Senior most Senior Clerks namely Mr. Jan-e-Alam, Mr. Chandi Khan and Mr. Samin Khan placed at S.No.1,2 & 3 of the seniority list who have already completed the requisite length of service and these are Senior Clerks for promotion. While Mr. Muhammad Zahir Senior Clerk being a more competent official has worked as Assistant General in Main Office from 2002 to 2014 (12 years). Besides, he also remained on key positions upto the entire satisfaction of his superiors and worked as Assistant Agency Planning Officer vide Planning & Development Department, FATA Secretariat, Peshawar order vide **Annexure-C**, Superintendent of the undersigned vide Commissioner Peshawar Division order vide **Annexure-D**. Being competent, experienced hand and dedicated person he deserves out of turn promotion as Assistant. The Synopsis of their ACRs and certificates regarding non-involvement in corruption / departmental inquiry are endorsed as **Annexures- 1 to 6**.

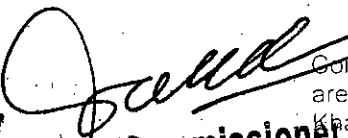
- 03 posts of Senior Clerks are already vacant and with the promotion of 03 Senior Clerks to the post of Assistant, the number of vacant posts of Senior Clerk will be 06. These vacant posts are to be filled by promotion of Junior Clerks.

- In terms of S.No.8, 5 of the appendix attached with Government of NWFP Revenue and Estate Department said Notification (**Annexure-A**) the method of recruitment has been prescribed for filling up the post of Senior Clerks as following:-

- By promotion on the basis of seniority-cum-fitness from amongst the holders of the post of Junior Clerks having at least three years service as such.

The seniority list of Junior Clerks (BPS-11) duly signed by the Deputy Commissioner Mohmand is attached as **Annexure-B**. 06 Junior Clerks, seniority wise are (1) Mr. Amjad Ali s/o Haroonur-Rasheed (20 years services) (2) Mr. Abdul Wakeel Khan s/o Khaista Rehman (19 years service) (3) Mr. Meraj Muhammad s/o Muhammad Ghulam (12 years service) (4) Mr. Abdur Rehman s/o Akram (10 years service) (5) Mr. Naseer Ahmad s/o Bashir Ahmad (10 years serviced) & (6) Mr. Shams-ue-Raman (08 years service) who have the requisite length of service are fit for promotion to the post of Senior Clerks on the basis of their ACRs. The Synopsis of their ACRs and certificates regarding non-involvement in corruption / departmental inquiry are attached as **Annexure- 7 to 19**.

Attested

  
Deputy Commissioner  
Mohmand Tribal District

• One (01) newly created post of Junior Clerk is lying vacant. With the promotion of 06 Junior Clerks against the vacant posts of the Senior Clerks, the total number of vacant posts of Junior Clerk will be 07.

• The then Political Agent Mohmand Agency advertised the vacant posts of Junior Clerk BPS-7 on 11.2.2010. Initially 04 candidates were appointed as Junior Clerk BPS-7 vide Political Agent Mohmand order No.3504-07/PAM/S dated 18.8.2010. Later on, another 04 candidates were appointed against the vacant posts of Junior Clerk BPS-7 vide Political Agent Mohmand order No.210-17/Acctt dated 18.01.2011.

• The following Selection / Promotion Committee has been constituted by AI&C Department, FATA Secretariat for determining suitability for promotion and selection for initial appointment to the posts in BS-15 and below bore on the Agency Cadre vide Notification No.FS/E/100-19(Vol-28)/4195-4207 dated 05.04.2010 (copy enclosed as **Annexure-E**) :-

- |    |   |            |
|----|---|------------|
| a) | Appointing Authority / Political Agent  | (Chairman) |
| b) | An Officer to be nominated by AI&C Department<br>FATA Secretariat except Finance & Planning Cells | (Member)   |
| c) | An officer to be nominated by Appointing Authority  | (Member)   |

• The petitioner Mr. Naseem Shah filed a writ petition in the Peshawar High Court vide writ petition No.3116-P/2012 against the said orders praying to direct the competent authority to issue the appointment order of the petitioner w.e.f 18.6.2010 with all service benefits

• The Peshawar High Court Peshawar has now announced the Judgment on writ petition C.M No 1157-P/2014 dated 28.03.2017. The operating Para-7 of the said Judgment is reproduced as under (copy enclosed as **Annexure-F**).

"For the reasons given herein above, the instant writ petition is allowed and accordingly the respondents are directed to issue appointment order of the petitioner within a period of thirty days from the date of announcement of the order".

• On 21.11.2017, Mr. Gohar Ali who was working as Senior Clerk died during office hours. Mr. Ashgar Ali s/o late Gohar Ali submitted an application for appointment as Junior Clerk in the office of the then Political Agent Mohmand against the deceased sons quota. His application was sent to Commissioner Peshawar Division Peshawar vide **Annexure-"G"** for approval as per rules for his appointment against the post of Junior Clerk.

• The Commissioner Peshawar Division Peshawar advised vide letter at **Annexure-H** that a meeting of Departmental Selection Committee may be convened and the applicant (Asghar Ali) may be appointed as Junior Clerk after vacation of the post by promotion against the deceased sons quota as per rules.


• Therefore, as per judgment of Peshawar High Court, appointment order of Mr. Naseem Shah Levy Sepoy to the post of Junior Clerk may be issued accordingly while Mr. Asghar Ali s/o late Gohar Ali (Ex-Senior Clerk) will be considered for appointment as Junior Clerk against the deceased sons quota.

With the appointment of Mr. Naseem Shah, Levy Sepoy as Junior Clerk and Mr. Asghar Ali against the deceased quota of Junior Clerk, 05 posts of Junior Clerks will be available for filling up through promotion.

• In terms of S.No.9 Column-3 and 5 of the appendix attached with Government of NWFP Revenue and Estate Department said Notification (**Annexure-A**) the method of recruitment has been prescribed for filling up the post of Junior Clerk as under:-

- 80% by initial recruitment &
- 20% by promotion amongst the Qasids and holders of equivalent posts who possess Secondary School certificate 2<sup>nd</sup> Division and have at least 03 years service as such.

Attested

  
Deputy Commissioner  
Mohmand Tribal District




18. Hence, in terms of above para-b, one (01) post falls to the promotion quota of Moharrirs and four (4) posts to initial recruitment. According to the seniority list vide Annexure-B Mr. Mohib Ullah s/o Najeem Khan (10 years service ) and Mr.Noor Muhammad (10 years service ) who have the requisite length of service and duly completed ACRs are fit for promotion to the post of Junior Clerks. Their Synopsis of their ACRs and certificate regarding non-involvement in corruption / departmental inquiry are attached Annexure-20 to 23 .

With the promotion of 02 Moharrirs, the post will become vacant which may be filled up amongst the eligible Qasids.

Hence in terms of above para-b 02 posts falls to the promotion quota of Qasids. According amongst the eligible Naib Qasids Mr. Mikaeel and Mr.Hamayun Khan are fit for promotion to Moharrirs. Class-IV seniority as Annexure-I.

Therefore, in order to implement the judgment of Peshawar High Court regarding appointment of Mr. Nasim Shah Levy Sepoy as Junior Clerk as well to comply with the direction of Commissioner Peshawar regarding appointment of Mr.Asgar Ali s/o Gohar Ali (late) against the deceased son quota and to determine the suitability of all named officials for promotion to the posts of Assistants, Senior Clerks, Junior Clerks and Moharrirs, a meeting of the Departmental Promotion / Selection Committee has been scheduled to be held at Ghallanai on 29.10.2018 at 11.00 AM.

  
Accountant

Attested

  
Deputy Commissioner  
Mobmand Tribal District

**Minutes of Departmental Promotion Committee Meeting held at Ghallanai on  
29<sup>th</sup> October, 2018.**

A meeting of the Departmental Promotion Committee was held under the Chairmanship of Deputy Commissioner Mohmand Tribal District on 29<sup>th</sup> October, 2018 to consider the promotion of existing ministerial staff against the vacant posts as per rules. Assistant Commissioner, Lower Mohmand Tribal District and Section Officer, AI&C Department, FATA Secretariat attended the meeting.

Meeting started with the recitation of a few verses from the Holy Quran. Opening the discussion the chairman welcomed the participants and informed them regarding the pros and cons of the meeting. The Seniority List, ACRs, Service Books and other related documents/record of the ministerial staff concerned were thoroughly checked and after detailed discussion, the following decisions were unanimously taken:-

**1. Filing up of the posts of Assistants (BPS-16)**

The committee unanimously recommended the following Senior Clerks for promotion against the vacant posts of Assistant on the basis as per detail given against each:-

- |      |                                 |   |   |
|------|---------------------------------|---|---|
| i.   | Mr. Jan-e-Alam<br>Senior Clerk  | } | Being top in seniority list of Senior Clerks having no adverse ACRs for the last five years and also possess the required length of service hence recommended for promotion to the post of Assistant. |
| ii.  | Mr. Chandi Khan<br>Senior Clerk |   |   |
| iii. | Mr. Samin Khan<br>Senior Clerk  |   |   |

**2. Filling up of the vacant posts of Senior Clerk.**

- |      |                                    |   |  |
|------|------------------------------------|---|--|
| i.   | Mr. Amjad Ali<br>Junior Clerk      | } | Being top in seniority list of Junior Clerks having no adverse ACRs for the last five years and also possess the required length of service hence recommended for promotion to the post of Senior Clerks |
| ii.  | Mr. Abdul Wakil<br>Junior Clerk    |   |  |
| iii. | Mr. Meraj Muhammad<br>Junior Clerk |   |  |
| iv.  | Mr. Abdur Rehman<br>Junior Clerk   |   |  |
| v.   | Mr. Naseer Ahmad<br>Junior Clerk   |   |  |
- Attested
- [Signature]*  
**Deputy Commissioner  
Mohmand Tribal District**
- Shamsur Rehman  
Junior Clerk

**3. Filling up of the vacant posts of Junior Clerk**

- |     |                            |  |
|-----|----------------------------|--|
| i.  | Mr. Nasim Shah<br>Moharrir | May be appointed as Junior Clerk against the vacant post in compliance with the Peshawar High Court Judgment dated 28.03.2017  |
| ii. | Mr. Asghar Ali<br>Moharrir | May be appointed as Junior Clerk against the deceased deceased sons quota as per approval of Commission Peshawar Division vide letter No. 6/2/EA/2017/111/06 dated 01.01.2018. |

### Filling up of the vacant posts of Junior Clerk

- i. Mr. Nasim Shah Moharrir  
May be appointed as Junior Clerk against the vacant post in compliance with the Peshawar High Court Judgment dated 28.03.2017
  - ii. Mr. Asghar Ali Moharrir  
May be appointed as Junior Clerk against the deceased deceased sons quota as per approval of Commissioner Peshawar Division vide letter No. 6/2/EA/2017/111/06 dated 01.01.2018.
  - iii. Mr. Mohib Ullah Moharrir
  - iv. Mr. Noor Muhammad Moharrir.
  - v. Mr. Wasif Khan Moharrir.
  - vi. Mr. Ihsan Ullah Moharrir.
  - vi. Mr. Hamid Khan Moharrir.
- Being top in seniority list of Moharrirs having no adverse ACRs for the last five years and also possess the required length of service hence recommended for promotion to the post of Junior Clerk.

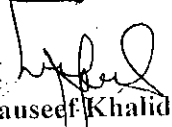
### 4. Filling up of the vacant posts of Moharrirs

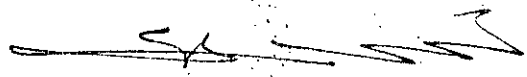
- i. Mian Mekail Beheshti/Class-IV  
He is the senior most Class-IV/Beheshti having passed SSC examination in 2008 and fulfills the required criteria for promotion to the post of Moharrir.
- ii. Mr. Hamayun Khan Naib Qasid  
He stands recruited as Naib Qasid on 14.11.2008. In the seniority list of Class-IV one Sher Khan has SSC with 3<sup>rd</sup> Division which disqualify him for consideration as per criteria. Hence the committee recommended that Mr. Humayun Khan ( Next in Seniority list may be promoted to the post of Moharrir as he fulfils the required

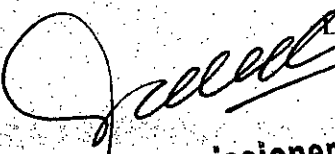
### 5. Filling up of remaining three posts of Moharrirs

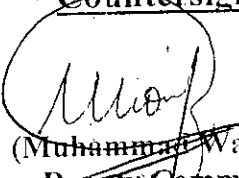
The remaining three (03) vacant posts will be filled through publication of advertisement in the national dailies as per rules.

Attested

  
(Tauseef Khalid)  
Assistant Commissioner  
Lower Mohmand Tribal Distt:

  
(Seyar Ahmad Khan)  
Section Officer  
AI&C Department FATA Secretariat.

  
Deputy Commissioner  
Mohmand Tribal District

Countersigned  
  
(Muhammad Wasif Saeed)  
Deputy Commissioner  
Mohmand Tribal District