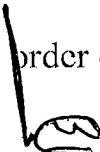


Form- A

FORM OF ORDER SHEET

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

Case No.- 1501/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/10/2022	<p>The appeal of Mr. Shaukat Ali resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR <sup>ew</sup></p>

The appeal of Mr. Shaukat Ali retired PSHT GPS Sher Ali kali Lower Orakzai received today i.e. on 07.10.2022 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Copy of rejection order of departmental appeal is not attached with the appeal which may be placed on it.
- 5- Annexure-I of the appeal is illegible which may be replaced by legible/better one.
- 6- Annexure-A seems to be a rough copy the same may be replaced.
- 7- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2778 /S.T,

Dt. 10/10 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Taimur Ali Khan Adv. Pesh.

Respected Sir,

1- Removed

2- Removed

3- Removed

4- copy of rejection order of departmental appeal is attached at page 29 of the appeal.

5- Removed

6- Removed

7- Removed

Resubmitted after compliance



18/10/2022.

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

SERVICE APPEAL NO. 1501/2022

Shoukat Ali

V/S

Education Deptt:

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**INDEX**

S. No.	Documents	Annexure	P. No.
01.	Memo of appeal	-----	01-03
02.	Affidavit	-----	04
03.	Copy of FIR	A	05
04.	Copy of suspension order	B	06
05.	Copies of attendance register, play slip. CNIC and of order dated 24.09.2021	C,DE&F	07-23
06.	Copies of order dated 09.12.2021, departmental appeal and rejection order dated 15.09.2022	G,H&I	26-29
07.	Vakalat Nama	-----	30

APPELLANT

THROUGH:

  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT  
PESHAWAR

Cell#03339390916

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

SERVICE APPEAL NO. 1501/2022

Khyber Pakhtunkhwa  
Service Tribunal

Entry No. 1547

Dated 07-10-2022

Shoukat Ali, Retired PSHT (BPS-15),  
GPS Sher Ai Kali, Lower Orakzai.

(APPELLANT)

VERSUS

1. The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa,
3. The District Education Officer District Orakzai.

(RESPONDENTS)

-----

APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974  
AGAINST THE ORDER DATED 09.12.2021 RECEIVED BY  
THE APPELLANT ON 24.03.2022, WHEREBY THE  
SUSPENSION PERIOD OF THE APPELLANT W.E.F 13.03.2021  
TO 13.09.2021 (185-DAYS) WAS TREATED WITHOUT PAY  
AND AGAINST THE ORDER DATED 15.09.2022, WHEREBY  
THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS  
REJECTED FOR NO GROUNDS.

File - the day

Registrar

07/10/2022

**PRAYER:**

THAT THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 09.12.2021 AND 15.09.2022 MAY KINDLY BE SET ASIDE AND THE RESPONDENTS MAY KINDLY BE DIRECTED TO CONVERT THE SUSPENSION PERIOD OF THE APPELLANT W.E.F 13.03.2021 TO 13.09.2021 (185-DAYS) INTO FULL PAY UNDER FR-53 (b). ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWTH:**

**FACTS:**

1. That the appellant has appointed in the respondent department in the year 1990 and since his appointment the appellant has performed his duty with great devotion and honesty, whatsoever, assigned to him and no complaint has been filed against him regarding his performance.
2. That the appellant while serving as PSHT in GPS Sher Ali Mi, was falsely implicated in criminal case vide FIR 73 dated 08.02.20 U/S 380, 411, 457 PPC P.S Ratta Amral Rawalpindi and the appellant has granted pre arrest bail by the competent court of law on 27.07.20  
**(Copy of FIR is attached as Annexure-A)**
3. That on the basis of above criminal case, the appellant was suspended with immediate effect through suspension order without mentioning the Endst No. and date. **(Copy of suspension order is attached as Annexure-B)**
4. That the appellant was on suspension, but he was verbally directed by his department to resume his duty without reinstating him from the suspension and on the basis of that direction he resumed his duty on 13.09.2021 which is evident from the attendance register of the school and he also received salary for that period and the appellant regularly performed his duty till his retirement as the appellant was retired from service on attaining the age of superannuation on 31.05.2022, however no proper order of retirement of the appellant has been issued by the department till date, but it can be endorsed from the date of birth mentioned in his CNIC and during performing his duty the appellant applied for bail, which was granted by the competent court of law on 24.09.2021. **(Copies of attendance register, play slip, CNIC and of order dated 24.09.2021 are attached as Annexure-C,D,E&F)**
5. That although the appellant was on suspension with effect from 13.03.2021 till 13.09.2021, but respondent No.3 passed an order dated 09.12.2021, wherein the period w.e.f 13.03.2021 to 13.09.2021 (185) days treated without pay, which is clear violation of FR-53 (b). The appellant received the said order dated on 24.03.2022 and filed departmental appeal on 07.04.2022, which was rejected on 15.09.2022 for no good grounds. **(Copies of order dated 09.12.2021, departmental appeal and rejection order dated 15.09.2022 are attached as Annexure-G,H&I)**



6. That the appellant has no other remedy except to file the instant service appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

**GROUND:**

- A. That the impugned orders dated 09.12.2021 and 15.09.2022 are against the law, facts, norms of justice and material on record, violation of FR-53 (b). therefore, not tenable and liable to be set aside.
- B. That the appellant has suspended on the basis of criminal case pending against him and he was entitled to full amount of his salary and all other benefits and other facilities under provided to him under the contract of service during the period of suspension under FR-53 (b), but his suspension period w.e.f 13.03.2021 to 13.09.2021 (185) days treated without pay, which is clear violation of FR-53 (b).
- C. That the appellant was suspended on the basis of criminal case pending against him, but his suspension period w.e.f 13.03.2021 to 13.09.2021 (185) days treated without pay through impugned order dated 09.12.2021, which is clear violation of Fr-53 (b) and as such the impugned order is liable to be set aside.
- D. That the appellant was not treated according to law and rules and has been deprived from his legal right of full pay under FR-53 (b) for suspension period w.e.f 13.03.2021 to 13.09.2021 (185) days, which was treated without pay.
- E. That the appellant seeks permission of this Honourable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

THROUGH:

  
APPELLANT  
Shoukat Ali  
  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT  
PESHAWAR

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

SERVICE APPEAL NO. \_\_\_\_\_/2022

Shoukat Ali

V/S

Education Deptt:

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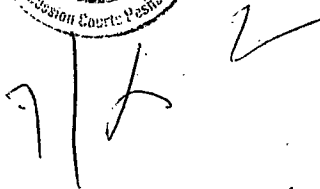
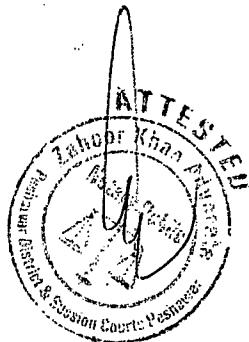
**AFFIDAVIT**

I, Shoukat Ali, Retired PSHT (BPS-15), GPS Sher Ai Kali, Lower Orakzai, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this august Court.



**DEPONENT**

Shoukat Ali  
(APPELLANT)









**OFFICE OF THE DISTRICT EDUCATION OFFICER**

DISTRICT ORAKZAI  
Phone No. 0925-690017

No. .... Dated...../...../.....

B 0

**SUSPENSION ORDER:**

in light of the CPO Rawalpindi FIR No. No. 73 accused under the law 457/380, dated 8/02/2021, the competent authority has been pleased to suspend Mr. Shoukat Ali PSHT at GPS Sher Ali Killi & Mst. Baswari Bibi PST at GGPS Sharo Dogala in Orakzai District with immediate effect till completion of the investigation/decision of the District Magistrate Rawalpindi.

**DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI**

Endst. No. ?..... Dated: ...../...../.....

Copy for information to the:

1. Deputy Commissioner, Orakzai.
2. Deputy Director (Estab), Directorate of Education (Merged Areas), Peshawar w.r.t his letter No. 5471/E-6/KC/Orakzai, dated 12/04/2021.
3. City Police Officer, Rawalpindi w.r.t his letter No. 3623, dated 10/04/2021.
4. District Police Officer, Orakzai for necessary legal action.
5. District Monitoring Officer, Orakzai.
6. District Account Officer, Orakzai with the request to stop their salaries with immediate effect.
7. ASDEOs (M/F), Lower Orakzai with the direction to do the needful regarding stoppage of their salaries till decision/clearance.

**DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI**



بابت ماہ اکتوبر 2021												رجسٹر حاضری مندرجہ ذیل											
نوشاد علی				محمد علی				عسحاق علی				شوکت علی				نمبر							
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6. P.S. ...

2021ء

بابت سالہ نو مہینے

(4)

9

نوشاد علی		محمد علی		مستاج علی		شیرین علی		مستاجر حاضرین	
پہنچا		پہنچا		PST		PSHT		مستاجر	
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P	20	P	20	1:35	8:30	C/Leave	8:30	20	8:30
<b>SUNDAY</b>									
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P	23	P	23	1:35	8:30	1:35	8:30	23	8:30
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P	30	P	30	C/Leave	8:30	11:50	8:30	30	8:30
P	31	P	31					31	

Date		Time		Status		Remarks		
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27		8:30	1:35	P	P			
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PST								
DST								

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2021

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PSHT	PSHT	PSHT	PSHT

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12

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دستخط مدیر

13

بابت ماہ مارچ 2022ء

نور محمد علی  
Chaukidar  
محمد علی  
Chaukidar  
حسین علی  
PST  
شوکت علی  
PSMT

روزانہ وظیفہ  
روزانہ وظیفہ  
روزانہ وظیفہ  
روزانہ وظیفہ

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**SUNDAY**

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**SUNDAY**

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**SUNDAY**

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۲۵	۱:35	8:30	1:35	8:30
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**SUNDAY**

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Election Holidays

روزانہ وظیفہ	روزانہ وظیفہ	روزانہ وظیفہ	روزانہ وظیفہ	روزانہ وظیفہ	روزانہ وظیفہ	روزانہ وظیفہ	روزانہ وظیفہ
۵							

دستخط و مہتمم



14

بابت ماہ اپریل 2022ء				رجسٹرڈ محاضری امداد نسیم			
نوٹس علی		محب علی		مستاج علی		انوکٹ علی	
W/M		W/M		PST		PSHT	
آد	دھلا	آد	دھلا	آد	دھلا	آد	دھلا
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<del>SUNDAY</del>							
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NSO	400	P	P	11:10	7:30	11:10	7:00
NSO	300	P	P	11:10	7:30	11:10	7:00
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NSO	300	P	P	11:10	7:30	C/Leave	7:30
NSO	400	P	P	11:10	7:30	11:10	7:30
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<del>SUNDAY</del>							
23 رمضان المبارک / 23 رمضان المبارک							
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NSO	400	محبت	محبت	10:25	7:30	11:10	7:30
NSO	300	محبت	محبت	10:25	7:30	11:10	7:30
NSO	400	محبت	محبت	10:25	7:30	11:10	7:30

روز	ماہ	سال	روز	ماہ	سال	روز	ماہ	سال
اپریل	2022		اپریل	2022		اپریل	2022	
اپریل	2022		اپریل	2022		اپریل	2022	
اپریل	2022		اپریل	2022		اپریل	2022	

رجسٹرڈ محاضرہ

15

2022		بابت ماہ		مستور حاضری گزار		مستور حاضری گزار		مستور حاضری گزار	
نفسیاتی		نفسیاتی		PST		PST		PST	
آد	دقیقہ	سائی	دقیقہ	آد	دقیقہ	سائی	دقیقہ	آد	دقیقہ
<b>6 تا 6 مئی 2022</b>									
<b>عید الفطر کی چھٹیاں</b>									
<del>SUNDAY</del>									
12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
<del>SUNDAY</del>									
C/Leave									
<del>SUNDAY</del>									
Absent -									
<del>SUNDAY</del>									
C/Leave									

**Dist. Govt. KP-Provincial**  
**District Accounts Office Orakzai at Hang**  
**Monthly Salary Statement (December-2021)**



**Personal Information of Mr SHAWKAT ALI d/w/s of ARIF ALI**

Personnel Number: 00433762 CNIC: 2160303837903  
 Date of Birth: 07.06.1962 Entry into Govt. Service: 25.05.1987

NTN:  
 Length of Service: 34 Years 07 Months 008 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL TEACHER 80926400-DISTRICT GOVERNMENT KHYBE  
 DDO Code: OI6012-DEO Primary Education Orakzai  
 Payroll Section: 001 GPF Section: 001 Cash Center: 15  
 GPF A/C No: GPF Interest Free GPF Balance: 310,593.00 (provisional)  
 Vendor Number: -  
 Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1528	Unattractive Area Allow	1,000.00
2148	15% Adhoc Relief All-2013	850.00	2199	Adhoc Relief Allow @10%	568.00
2211	Adhoc Relief All 2016 10%	3,143.00	2224	Adhoc Relief All 2017 10%	4,272.00
2247	Adhoc Relief All 2018 10%	4,272.00	2264	Adhoc Relief All 2019 10%	4,272.00
2309	Adhoc Relief All 2021 10%	4,272.00	2315	Special Allowance 2021	3,500.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-1,200.00
3990	Emp.Edu. Fund KPK	-125.00	4004	R. Benefits & Death Comp:	-600.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00 Recovered till DEC-2021: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 75,614.00 Deductions: (Rs.): -4,815.00 Net Pay: (Rs.): 70,799.00**

Payee Name: SHAWKAT ALI  
 Account Number: 29561-7  
 Bank Details: NATIONAL BANK OF PAKISTAN, 230354 MAIN BRANCH KOHAT MAIN BRANCH KOHAT, KOHAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:  
 City: ORAKZAI AGENCY Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address:  
 City: Email: shoukatalihng@gmail.com

**Dist. Govt. KP-Provincial**  
**District Accounts Office Orakzai at Hang**  
**Monthly Salary Statement (January-2022)**



**Personal Information of Mr SHAWKAT ALI d/w/s of ARIF ALI**

Personnel Number: 00433762 CNIC: 2160303837903 NTN:  
 Date of Birth: 07.06.1962 Entry into Govt. Service: 25.05.1987 Length of Service: 34 Years 08 Months 008 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL TEACHER 80926400-DISTRICT GOVERNMENT KHYBE  
 DDO Code: OI6012-DEO Primary Education Orakzai  
 Payroll Section: 001 GPF Section: 001 Cash Center: 15  
 GPF A/C No: GPF Interest Free **GPF Balance:** 313,483.00 (provisional)  
 Vendor Number: -  
**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1528	Unattractive Area Allow	1,000.00
2148	15% Adhoc Relief All-2013	850.00	2199	Adhoc Relief Allow @10%	568.00
2211	Adhoc Relief All 2016 10%	3,143.00	2224	Adhoc Relief All 2017 10%	4,272.00
2247	Adhoc Relief All 2018 10%	4,272.00	2264	Adhoc Relief All 2019 10%	4,272.00
2309	Adhoc Relief All 2021 10%	4,272.00	2315	Special Allowance 2021	3,500.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-1,200.00
3990	Emp.Edu. Fund KPK	-125.00	4004	R. Benefits & Death Comp:	-600.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00 Recovered till JAN-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 75,614.00 Deductions: (Rs.): -4,815.00 Net Pay: (Rs.): 70,799.00**

Payee Name: SHAWKAT ALI  
 Account Number: 29561-7  
 Bank Details: NATIONAL BANK OF PAKISTAN, 230354 MAIN BRANCH KOHAT MAIN BRANCH KOHAT, KOHAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: ORAKZAI AGENCY Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address: City: Email: shoukatalihng@gmail.com

**Dist. Govt. KP-Provincial**  
**District Accounts Office Orakzai at Hang**  
**Monthly Salary Statement (February-2022)**



**Personal Information of Mr SHAWKAT ALI d/w/s of ARIF ALI**

Personnel Number: 00433762 CNIC: 2160303837903 NTN:  
 Date of Birth: 07.06.1962 Entry into Govt. Service: 25.05.1987 Length of Service: 34 Years 09 Months 005 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL TEACHER 30926400-DISTRICT GOVERNMENT KHYBE  
 DDO Code: OI6012-DEO Primary Education Orakzai  
 Payroll Section: 001 GPF Section: 001 Cash Center: 15  
 GPF A/C No: GPF Interest Free **GPF Balance:** 316,373.00 (provisional)  
 Vendor Number: -

**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1528	Unattractive Area Allow	1,000.00
2148	15% Adhoc Relief All-2013	850.00	2199	Adhoc Relief Allow @10%	568.00
2211	Adhoc Relief All 2016 10%	3,143.00	2224	Adhoc Relief All 2017 10%	4,272.00
2247	Adhoc Relief All 2018 10%	4,272.00	2264	Adhoc Relief All 2019 10%	4,272.00
2309	Adhoc Relief All 2021 10%	4,272.00	2315	Special Allowance 2021	3,500.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-1,200.00
3990	Emp.Edu. Fund KPK	-125.00	4004	R. Benefits & Death Comp:	-600.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00 Recovered till FEB-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 75,614.00 Deductions: (Rs.): -4,815.00 Net Pay: (Rs.): 70,799.00**

Payee Name: SHAWKAT ALI  
 Account Number: 29561-7  
 Bank Details: NATIONAL BANK OF PAKISTAN, 230354 MAIN BRANCH KOHAT MAIN BRANCH KOHAT, KOHAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: ORAKZAI AGENCY Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address: City: Email: shoukatalihng@gmail.com

**Dist. Govt. KP-Provincial**  
**District Accounts Office Orakzai at Hang**  
**Monthly Salary Statement (March-2022)**



**Personal Information of Mr SHAWKAT ALI d/w/s of ARIF ALI**

Personnel Number: 00433762 CNIC: 2160303837903 NTN:  
 Date of Birth: 07.06.1962 Entry into Govt. Service: 25.05.1987 Length of Service: 34 Years 10 Months 008 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL TEACHER 80926400-DISTRICT GOVERNMENT KHYBE  
 DDO Code: OI6012-DEO Primary Education Orakzai  
 Payroll Section: 001 GPF Section: 001 Cash Center: 15  
 GPF A/C No: GPF Interest Free **GPF Balance:** 319,263.00 (provisional)  
 Vendor Number: -

**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil , BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1528	Unattractive Area Allow	1,000.00
2148	15% Adhoc Relief All-2013	850.00	2199	Adhoc Relief Allow @10%	568.00
2211	Adhoc Relief All 2016 10%	3,143.00	2224	Adhoc Relief All 2017 10%	4,272.00
2247	Adhoc Relief All 2018 10%	4,272.00	2264	Adhoc Relief All 2019 10%	4,272.00
2309	Adhoc Relief All 2021 10%	4,272.00	2315	Special Allowance 2021	3,500.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-1,200.00
3990	Emp. Edu. Fund KPK	-125.00	4004	R. Benefits & Death Comp:	-600.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00 Recovered till MAR-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 75,614.00 Deductions: (Rs.): -4,815.00 Net Pay: (Rs.): 70,799.00**

Payee Name: SHAWKAT ALI  
 Account Number: 29561-7  
 Bank Details: NATIONAL BANK OF PAKISTAN, 230354 MAIN BRANCH KOHAT MAIN BRANCH KOHAT, KOHAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: ORAKZAI AGENCY Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address: City: Email: shoukatalihng@gmail.com

**Dist. Govt. KP-Provincial**  
**District Accounts Office Orakzai at Hang**  
**Monthly Salary Statement (April-2022)**



**Personal Information of Mr SHAWKAT ALI d/w/s of ARIF ALI**

Personnel Number: 00433762 CNIC: 2160303837903 NTN:  
 Date of Birth: 07.06.1962 Entry into Govt. Service: 25.05.1987 Length of Service: 34 Years 11 Months 007 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL TEACHER 80926400-DISTRICT GOVERNMENT KHYBE  
 DDO Code: OI6012-DEO Primary Education Orakzai  
 Payroll Section: 001 GPF Section: 001 Cash Center: 15  
 GPF A/C No: GPF Interest Free **GPF Balance:** 322,153.00 (provisional)  
 Vendor Number: -

**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1528	Unattractive Area Allow	1,000.00
2148	15% Adhoc Relief All-2013	850.00	2199	Adhoc Relief Allow @10%	568.00
2211	Adhoc Relief All 2016 10%	3,143.00	2224	Adhoc Relief All 2017 10%	4,272.00
2247	Adhoc Relief All 2018 10%	4,272.00	2264	Adhoc Relief All 2019 10%	4,272.00
2309	Adhoc Relief All 2021 10%	4,272.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	6,408.00	5002	Adjustment House Rent	9,045.00
5011	Adj Conveyance Allowance	7,330.00	5012	Adjustment Medical All	3,850.00
5102	Adj Unattractive Area All	3,850.00	5150	Adj. Teaching Allow 2021	8,275.00
5151	Adj. Adhoc Rel Allow 2021	10,965.00	5155	Adj. Disp. Red All 2022KP	6,408.00
5309	Adj. 15% Adhoc Allowance	2,182.00	5322	Adj Adhoc Relief All 2018	10,965.00
5336	Adj Adhoc Relief All 2019	10,965.00	5801	Adj Basic Pay	122,431.00
5975	Adj Adhoc Relief All 2016	8,067.00	5990	Adj Adhoc Relief All 2017	10,965.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-2,333.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-600.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 8,193.45 Recovered till APR-2022: 2,333.00 Exempted: 1194.73 Recoverable: 4,665.72

**Gross Pay (Rs.): 297,370.00 Deductions: (Rs.): -7,148.00 Net Pay: (Rs.): 290,222.00**

Payee Name: SHAWKAT ALI

Account Number: 29561-7

Bank Details: NATIONAL BANK OF PAKISTAN, 230354 MAIN BRANCH KOHAT MAIN BRANCH KOHAT, KOHAT

Leaves: Opening Balance: Aailed: Earned: Balance:

**Dist. Govt. KP-Provincial**  
**District Accounts Office Orakzai at Hang**  
**Monthly Salary Statement (May-2022)**



**Personal Information of Mr SHAWKAT ALI d/w/s of ARIF ALI**

Personnel Number: 00433762 CNIC: 2160303837903 NTN:  
 Date of Birth: 07.06.1962 Entry into Govt. Service: 25.05.1987 Length of Service: 35 Years 00 Months 008 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL TEACHER 80926400-DISTRICT GOVERNMENT KHYBE  
 DDO Code: OI6012-DEO Primary Education Orakzai  
 Payroll Section: 001 GPF Section: 001 Cash Center: 15  
 GPF A/C No: GPF Interest Free GPF Balance: 325,043.00 (provisional)  
 Vendor Number: -  
 Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1528	Unattractive Area Allow	1,000.00
2148	15% Adhoc Relief All-2013	850.00	2199	Adhoc Relief Allow @10%	568.00
2211	Adhoc Relief All 2016 10%	3,143.00	2224	Adhoc Relief All 2017 10%	4,272.00
2247	Adhoc Relief All 2018 10%	4,272.00	2264	Adhoc Relief All 2019 10%	4,272.00
2309	Adhoc Relief All 2021 10%	4,272.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	6,408.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-2,333.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-600.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 8,193.45 Recovered till MAY-2022: 4,666.00 Exempted: 1194.66 Recoverable: 2,332.79

Gross Pay (Rs.): 82,022.00 Deductions: (Rs.): -7,148.00 Net Pay: (Rs.): 74,874.00

Payee Name: SHAWKAT ALI  
 Account Number: 29561-7  
 Bank Details: NATIONAL BANK OF PAKISTAN, 230354 MAIN BRANCH KOHAT MAIN BRANCH KOHAT, KOHAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:  
 City: ORAKZAI AGENCY Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address:  
 City: Email: shoukatalihng@gmail.com



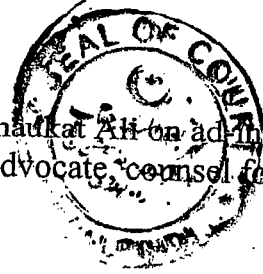
F 23

جمہوریہ پاکستان  
قومی شناختی کارڈ  
21603-0383790-3  
سید محمد علی  
والد کا نام: عارف علی  
شادی کی حالت: ایسے کان پرست  
مکمل تاریخ: مارچ 2012ء 01/06/1962  
سٹار سسٹمز پرائیویٹ لمیٹڈ

YR7W24 فائدہ ایسے 21603-0383790-3  
14782100995  
21/10/2022 تاریخ سسٹمز 21/10/2012  
سٹار سسٹمز پرائیویٹ لمیٹڈ

24.09.2021

Present:- Accused/petitioner Shaukat Ali on ad-interim pre-arrest bail.  
Raja Arshad Hayat Advocate, counsel for the accused/petitioner.  
I.O with record.  
ADPP for the State.



Through instant petition, accused/petitioner Shaukat Ali has sought his pre-arrest bail in case FIR No.73 dated 08.02.2021, offence U/S 457/380/411 PPC, registered at P.S Ratta Amral, Rawalpindi.

2. It has been argued by learned counsel for the accused/petitioner that accused/petitioner is innocent and has falsely been involved in this case on the basis of concocted story; that the accused/petitioner is not nominated in the FIR; that the case of accused/petitioner is one of further inquiry; that the alleged offence does not fall within the ambit of prohibitory clause of Section 497 Cr.P.C; that co-accused have already been admitted to bail by learned Area Magistrate. It has been prayed that by accepting this bail petition, ad-interim pre-arrest bail already granted to the accused/petitioner may be confirmed.

3. On the other hand, learned ADPP on behalf of the State has vehemently opposed this bail petition and has prayed for its dismissal.

4. Arguments heard. Record perused.

5. The present case was registered against some unknown accused initially and then one of the accused Shahzad Ali was arrested. Upon the disclosure made by accused Shahzad Ali while in police custody, the present accused/petitioner Shoukat Ali as well as the accused Nadia and Baswari Jan were nominated vide Zimni No.20 dated 17.03.2021. The allegation against the present accused/petitioner is only to the extent that the accused Shahzad Ali handed over 660 grams gold i.e stolen property to him and the others for keeping the same in their custody. In this way, the offence attributed to accused/petitioner falls within the definition of offence U/S 411 PPC. As already mentioned the present accused/petitioner has been nominated on the basis of a disclosure by the co-accused but such disclosure holds no importance in the eyes of law. No detail regarding the involvement of present accused/petitioner or the time, date and place of receiving of case property has been provided. The present accused/petitioner is close relative of the



07-09-2021

سائل المنوم بر لانت  
کوشن سائل

فاضل انیسٹریشن صاحب لانت پر جیلوں کے لئے منظور

پر لانت کیلئے منظور 14/09/2021 کو پیش ہوئے

21603-0383790-3



Handwritten mark

**TAHIR ABBAS SIPRA**  
Additional District & Sessions Judge  
Rawalpindi

14-09-2021 سائل المنوم بر لانت  
محرمہ

کوشن سائل

صاحب اسٹریٹ عاقلوں سے لانت کیلئے منظور 18/09/2021 کو

پیش ہوئے

TAHIR ABBAS SIPRA  
Additional District & Sessions Judge  
Rawalpindi

18-09-2021 سائل المنوم بر لانت  
محرمہ

اصولاً عدالت میں پیش ہوئے۔ صلوات علیہم

کیلئے منظور 23/09/2021 کو پیش ہوئے

**TAHIR ABBAS SIPRA**  
Additional District & Sessions Judge  
Rawalpindi

23-09-2021 سائل المنوم بر لانت  
محرمہ

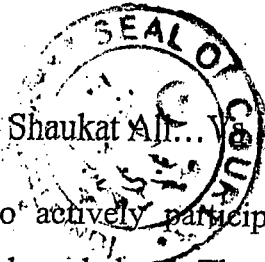
پیش ہوئے۔ صلوات علیہم اور سب سے اعلیٰ عدالت میں

صاحب اسٹریٹ عاقلوں سے لانت کیلئے منظور 23/09/2021 کو

TAHIR ABBAS SIPRA  
Additional District & Sessions Judge  
Rawalpindi

پیش ہوئے

25

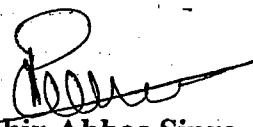


Shaukat Ali... Vs. The State

other accused who actively participated in the occurrence and his false nomination cannot be ruled out. The main accused who nominated them has already been granted bail. It is pertinent to mention here that two other co-accused Mst.Nadia and Baswari Jan having the same role have also been granted pre-arrest bail vide order dated 27.07.2021 and the present accused/petitioner is also entitled for grant of bail under the rule of consistency. In view of that instant bail petition is accepted and ad-interim pre-arrest bail already granted to the accused/petitioner is confirmed subject to his furnishing bail bonds in the sum of Rs.50,000/- with one surety in the like amount to the satisfaction of learned trial Court within seven days of this order. File be consigned to the record room after its due completion and compilation.

Announced  
24.09.2021



  
Tahir Abbas Sipra,  
Addl: Sessions Judge,  
Rawalpindi

ATTESTED  
25 SEP 2021  
STATE JUDGE  
RAWALPINDI

Petition No. 72155  
2582  
No. of Pages 6  
Fees 12  
2582  
Submitted to Applicant  
25/9/21



OFFICE OF THE DISTRICT EDUCATION OFFICER, DISTT: ORAKZAI.

926

**LEAVE SANCTION ORDER.**

In exercise of power conferred upon the competent authority vide rules 5-(a) of the District Govt: Rules of Business 2001 read with NWFP Govt: revised leave rules 1981. Sanction to the grant of following leave are hereby accorded.

S.No.	Name of Officials & Desig:	Name of Office/ School	Nature of Leave	Period of Leave	Remarks
1	Mr. Shoukat Ali PSHT	GPS Darvezai	Leave without pay	Wef: 13/3/2021 to 13/9/2021 (185)	(185 Days without pay)

Note :- Necessary entry to this effect should be made in her/his service books.

(FARID ULLAH MEHSOOD)  
DISTT. EDUCATION OFFICER,  
DISTT: ORAKZAI.

Endst: No. 9126-92 / Dated Orakzai the 9/19/2021.

Copy to the:-

1. District Accounts Officer, Distt: Orakzai.
2. DDEO (M) Distt: Orakzai.
3. ASDEO Circle Office.
4. DMO Distt: Orakzai.
5. Head Teacher concerned.
6. Official concerned.
7. Office copy

DISTT. EDUCATION OFFICER,  
DISTT: ORAKZAI.

آرڈر نمبر 9126-92 مورخہ 19 ستمبر 2021ء آفیس آف ڈسٹرکٹ ایجوکیشن آفیسر، اوراکزائی

TO

The Director (E&SE) Department,  
Khyber Pakhtunkhwa Peshawar.

427

Subject: **DEPARTMENT APPEAL AGAINST THE ORDER DATED 09-12-2021 OF THE DISTRICT EDUCATION OFFICER DISTRICT ORAKZAI (COMMUNICATED TO THE APPELLANT ON 24-03-2022)**

Respected Sir,

Most respected it is stated that:

1. I am regular employee of your department and presently working as Primary School Head Teacher (BPS-15) and while lastly posted at Govt. Primary School, Khair Ali Kali, Lower Orakzai was involved in a concocted case vide FIR No. 73 dated 08-02-2021 u/s 157/380/411 PPC of Police Station Rata Amral, Rawalpindi.

2. I immediately approached the District Education Officer Orakzai by conveying the actual fact regarding false implication in the mentioned case vide application of the even date.

(Copy of the application is attached)

3. In response to the application, I was suspended by the competent authority on the same ground.

(Copy of Suspension Order is attached)

4. After release on bail by the court of Law in September 2021, I approached the competent authority (District Education Officer, Orakzai) for resuming my duties and accordingly started performing my duties. Astonishingly, I was informed that the period of suspension w.e.f 13-03-2021 to 13-09-2021 has been treated as Leave Without Pay (LWP) by the competent authority vide order dated 09-12-2021 which was received by me through my own efforts on 24-03-2022.

(Copy of Impugned order dated 09.12.2021 is attached)

5. In this respect it is stated that the impugned order is illegal on the ground that I was properly suspended as I have timely informed my high ups regarding my false involvement in a criminal.

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6. I properly appeared before the competent court of Law for facing the consequences of the false FIR registered against me wherein I was bail out in September 2021.
7. Accordingly, the prevailing law & rules I am fully entitle for the Pay & Other allowances during my suspension period i.e. 13-03-2021 to 13-09-2021 but unfortunately, the competent authority issued the impugned illegal order dated 09-12-2021 without any cogent reason and without affording any opportunity of my personal defense.

It is, therefore, most kindly requested that the impugned order dated 09-12-2021 may be cancelled and I my allowed to draw the benefit of the period from 13-03-2021 to 13-09-2021 and oblige please.

Dated: 07-04-2022

Obediently Yours,

**SHOUKAT ALI (PSHT),**  
GPS Khair Ali Kali, Lower Orakzai

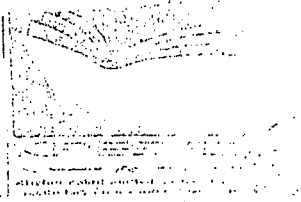
NOTICE (1) - The Post Office is not responsible for loss or damage in the case of inland registered

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OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohat Road, Muslimabad-Hangu.  
Phone # 0925-690017 Fax # 0925-690017  
Email: deorakzai2020@gmail.com  
Endst No 4873 Date: 15-9-2022



To,  
The Assistant Director (Estab.)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 9/12/2021 OF THE DEO ORAKZAI (COMMUNICATED TO THE APPEAL ON 24/3/2022).

Please refer to your office letter No 5759-61/EM/II M-Orak Vol 01, Dated 6/7/2022 in the above captioned subject.

Detail reply of the aforesaid appeal is as under:

1. Mr. Shoukat Ali PSHT was serving at GPS Khair Ali Kill, Lower Orakzai, he was absent without leave dated 13/3/2021 to 13/9/2021 (185 days) without prior permission from concerns. Absentee's reports of ASDEO Lower & Deputy DEO are annexed.
2. This office approved/converted absent period (185 days) to leave without pay vide No 4188-82 dated 9/12/2021 (Leave sanction order is attached for ready reference)
3. Mr. Shoukat Ali PSHT was charged under FIR No. 73 Dated 8/2/2021, offence U/S 457/390A/11 PPC, registered at Police station Ratta Amral, District Rawalpindi.
4. Bail before arrest (BBA) was granted on 24-9/2021 by Additional Session Judge Rawalpindi (Copy Sheet is attached).
5. Mr. Shoukat Ali resumed his duty from 13/9/2021 in GPS Khair Ali Kill Lower Orakzai and his salary is active since then accordingly.  
Now he is demanding the salaries of the absentee's period i.e (185 days) which has already been converted to leave without pay. (Application of the applicant is attached).

As the appellant was found absconder by the Punjab Police & remained absent from official duty during the period as mentioned above. Moreover, his absent period has already been converted into leave without pay, hence his pay in the instant period could not be justified.

Report is submitted for your kind perusal as desired, please

*[Signature]*  
DISTRICT EDUCATION OFFICER  
ORAKZAI

Copy of Event No. & Date:

Copy forwarded for information and necessary action to the:-

1. PA to the Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. PA to Additional Director (Estab.), Directorate of Education, Merged Areas, Peshawar.
3. ADEO (Litigation), local office, Orakzai
4. Mr. Shoukat Ali, PSHT GPS Khair Ali Kalai, Lower Orakzai.
5. Office Copy.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
ORAKZAI



OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI  
Umar Plaza, Main Kohat Road, Muslimabad-Hangu.  
Phone # 0925-690017 Fax # 0925-690017  
EMAIL: DEOORAKZAI2020@GMAIL.COM  
Endst No. 9873 Date: 15.7.2022

To,

The Assistant Director (Estab:)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENT APPEAL AGAISNT THE ORDER DATED 9/12/OF THE DEO ORAKZAI (COMMUNICATED TO THE APPEAL ON 24/3/2022).

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1. Mr. Shoukat Ali PSHT was serving at GPS Khair Ali Kili Lower Orakzai, he was absent w.e.f from dated 13/3/2021 to 13/9/2021 (185 days) without prior permission from concerns. Absentee's reports of ABDEO lower & Deputy DEO are annexed.
2. This office approved converted absent period (185 days) to leave without pay vide NO. 9186-92 dated 9/12/2021 (Leave sanction order is attached for ready reference)
3. Mr. Shukat Ali PSHT was charged under FIR No. 91 Dated 8/2/2021 offence U/S 457/380/411 PPC registered at Police station Ratia Amral. District Rawalpindi.
4. Ball before arrest (BBA) was granted on 24-9-2021 by Additional Session judge Rawalpindi (Order Sheet is attached).
5. Mr. Shaukat Ali resumed his duty from 13/9/2021 in GPS Khair Ali Killi Lower Orakzai and his salary is active since then accordingly  
Now he is demanding the salaries of the absentee's period i.e (185 days) which has already been converted to leave without pay. (Application of the applicant is attached).

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DISTRICT EDUCATION OFFICER  
ORAKZAI

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5. Office Copy.

DISTRICT EDUCATION OFFICER  
ORAKZAI

**VAKALAT NAMA**

NO. \_\_\_\_\_/2021

IN THE COURT OF KP Service Tribunal Peshawar

Shoukat Ali (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

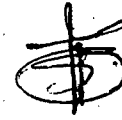
Education Deptt (Respondent)  
(Defendant)

I/We, Shoukat Ali

Do hereby appoint and constitute **Taimur Ali Khan, Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/2021



(CLIENT)

ACCEPTED

**TAIMUR ALI KHAN**  
Advocate High Court  
BC-10-4240

CNIC: 17101-7395544-5  
Cell No. 0333-9390916

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar