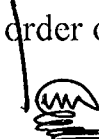


FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1671/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/11/2022	<p>The appeal of Mr. Sarwar Khan presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.


APPEAL No. 1671 /2022

SARWAR KHAN

VS

LOCAL GOVT. DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
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4.	Educational Testimonials	"C"	19-22
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PETITIONER

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1671 /2022

Mr. Sarwar Khan, Naib Qasid BPS-04
Village Council Ghundo, District Malakand.

..... **APPELLANT**

VERSUS

- 1- The Secretary LG&RD Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General LG&RDD Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Assistant Director LG&RDD, District Malakand.
- 4- Mr. Shahab Hussain, Junior Village Secretary (BPS-09), VC Bala Batkhela, District Malakand.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 07.08.2018 WHEREBY JUNIOR TO THE APPELLANT HAS BEEN PROMOTED TO THE POST OF JUNIOR VILLAGE SECRETARY (BPS-09) WHILE THE APPELLANT WAS IGNORED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned order dated 07.08.2018 of the respondents may very kindly be set aside to the extent of private respondent No.4 and the respondents may kindly be directed to consider the appellant for promotion to the post of Junior village Secretary BPS-09 w.e.f. 7.8.2018 with all back benefits including seniority. Any other remedy which this august Court deems fit may also be awarded in favor of appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant was initially appointed as Naib Qasid at u/c Sakhakot, District Malakand in the respondents department vide order 12.04.2005 and start performing his duties quite efficiently up to the entire satisfaction of his superior. Copy of the service book is attached as annexure **A.**
- 2- That since the appointment, the appellant has served the respondents department for more than 16 years quite efficiently, with zeal and zest and honored an unblemished service record. Copies of employment profile card and salary slip are attached as annexure.....**B.**

- 3- That it is pertinent to mention here that the appellant is a qualified person having Intermediate Certificate and also obtained DIT Certificate from Skill Development Council Peshawar. Copies of the Educational Testimonials are attached as annexure.....C.
- 4- That the respondents department issued the seniority list of Naib Qasib of VC/NC of District Malakand, whereby the appellant was placed at Serial No.16 while the private respondent No.04 was placed at Serial No.17 in the ibid seniority list. Copy of the Seniority List is attached as annexureD.
- 5- That the appellant being eligible in all respect having the requisite qualification quite hopeful for their promotion to the post of junior Secretary (BPS-09), but astonishingly the respondent department issued the impugned order dated 07.08.2018 whereby the private respondent No.4 has been promoted to the post of Junior Secretary (BPS-09) despite the fact that the appellant was senior from the private respondent. Copy of the Impugned order dated 07.08.2018 is attached as annexureE.
- 6- That felling aggrieved appellant preferred departmental appeal before the respondents, but no response has been given by the respondent department till the expiry of statutory period of ninety days. Copy of the Departmental Appeal is attached as annexure.....F.
- 7- That having no other remedy the appellant filed the instant appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 07.08.2018 whereby the private respondent No.4 has been promoted to the post of Junior Secretary (BPS-09) despite the fact that the appellant was senior from the private respondent is against the law, facts and norms of natural justice.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That as per the service rules of the respondent department the post of junior Village Council Secretary has to be filled up twenty percent by promotion on the basis of seniority-cum-fitness, from amongst the Naib Qasids and Chowkidar as per the ibid service rules the appellant is eligible to be promoted to the post of Junior Secretary (BPS-09). Copy of the Service Rule is attached as Annexure..... G.
- D- That the respondent Department acted in arbitrary and malafide manner by not promoting the appellant to the post of Junior Secretary (BPS-09).

- E- That the appellant has been discriminated by the respondent Department on the subject noted above and as such the respondent violated the principle of natural justice.
- F- That by not promoting the appellant to the post of Junior Secretary (BPS-09). violated section-9 of the civil servant Act, 1973 read with Rule-7 of the appointment, promotion and transfers Rules 1989.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT

Dated: 23-11-22


SARWAR KHAN


THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


UMAR FAROOQ MOHMAND


WALEED ADNAN


MUHAMMAD AYUB


**KHANZAD GUL
ADVOCATES**

AFFIDAVIT

I Mr. Sarwar Khan, Naiq Qasid BPS-04, Village Council Ghando, District Malakand, do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


DEPONENT

(For use in Police Department only)

11/14

Heirs

1
2
3

Verification Roll No. dated received back

Left thumb impression

Qualification	Date	Qualification	Date
---------------	------	---------------	------

English		First A/S passed 1st time under A/S 14/11/2011 (85%)	
---------	--	--	--

Pashtu		@ B.L. or B.A. passed 1st time under A/S and 11/10/388/12	
--------	--	---	--

Urdu		Pleadership examination from 1st time under A/S	
------	--	--	--

Plan-drawing		Training School (1st time) Final examination	
--------------	--	---	--

Finger print		Other qualifications	
--------------	--	----------------------	--

Drill instructing		① S.A. certificate from 1st time under A/S 15/11/2011	
-------------------	--	---	--

Court duties		1st time under A/S 15/11/2011	
--------------	--	----------------------------------	--

Reserve duties			
----------------	--	--	--

[Signature]
Date: 11/14

Year - The name of the ... (faint text)

1. Name **MR SARWAR KHAN**
2. Race **Jouhar Zai**
3. Residence **ARAB DAND, SAWIKOT, MALAKAD**

4. Father's name and residence **AMIR NAWAR KHAN, Arab Dand, Sawikot, Malakad.**

5. Date of birth by Christian era as nearly as can be ascertained **3-4-1985 (Three April Ninety five)**

6. Exact height by measurement **5'5"**

7. Personal marks for identification **A mole on left side of the face.**

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

**Assistant Head of Office
L.C. & R.O.
Distt. Malakad**

**Head of the Office
MALAKAD**

Date
R/No
1900
Even
Annual
Marks
699

Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating (i) Substantive appointment or (ii) whether service counts for pension under ARTS/CTS Rules	Pay in Substantive Post	Additional Pay for Officiating	Other emoluments under the same pay	Date of Appointment	Signature of Governmental Secretary	Signature of the Officer Posting (Substantive Column)
<i>BPS No. 1 Rs 1870-55-35204</i>								
<i>New Band at U/C Sakhalat Malakand Agency</i>	<i>Temporary</i>		<i>Rs 1870</i>	<i>Per Cent</i>		<i>12-4-2005</i>		
<i>New pay scale (5150-65-1100)</i>								
<i>Mail Order in U/C Sakhalat Malakand</i>		<i>Contd</i>	<i>2150/-</i>			<i>12-2005</i>		
<i>DO</i>		<i>DO</i>	<i>2219/-</i>			<i>12-2005</i>		
<p>2006</p> <p>Office of The Accountant General N.W.F.P. Peshawar</p> <p>Pay Fixed in The Revised Basic Pay Scales 2005</p> <p>OF RS 2155-30-4530/08</p> <p>AT RS 2155-30-4530/08</p> <p>With Next Increment on 12/12/05</p> <p>Accounts Office</p> <p>Pay Fixation Party N.W.F.P. Peshawar</p>								
<i>DO</i>		<i>DO</i>	<i>2230/-</i>			<i>12-2005</i>		

Leave	Government to which debitable	Signature of the head of the office or other	Reference to record of punishment or censure, or a Government Seal or prize of office or other
Allocation of period of leave on average pay up to four months for which leave salary is debitable to another Government			

Appointed as NAB Deputy on 11-4-2005

No. 2942-46 dated 11-4-2005

wide by Maharashtra order

Department of Revenue

Commissioner's Office

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

DD 09-7-2005, 10 pay grade

14

Signature and designation of the head of the office or other

Date of termination (such as promotion, transfer, dismissal, etc.)

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

15

Signature and designation of the head of the office or other

Date of termination (such as promotion, transfer, dismissal, etc.)

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

Date of termination

Reason of termination

Signature of the head of the office or other

9-

Signature and designation of the head of the office or other attesting officer in accordance of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to recorded points or censure, or in or praise of Government Service
				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		
					Period Government to which debitable		
<i>[Signature]</i> Asstt. Coordination Officer	25/10				Revised via Notification No. PD(PRC) 1-1/07 dt. 20/7/07		
<i>[Signature]</i> Asstt. Coordination Officer Malakand.	25/10				Amended BPS vide Notification No. PD/50(FR) 7-2/07 dt. 28/7/07		
<i>[Signature]</i> Asstt. Coordination Officer Malakand.	30/11/07	Annual leave					
<i>[Signature]</i> Asstt. Coordination Officer Malakand.					Service from 1/12/06 to 31/1/07 Verified from the office copies of Pay Bills and other records and found correct.		
<i>[Signature]</i> Asstt. Coordination Officer Malakand.	30/1/08						
<i>[Signature]</i> Asstt. Coordination Officer Malakand.					Adjustment BPS-2008, vide Govt. of NDAF Finance Dept. letter No. FDC (PRC) 1-1/2008, dated 10/7/08 w.e.f. 1/7/08		
<i>[Signature]</i> Asstt. Coordination Officer Malakand.							
<i>[Signature]</i> Asstt. Coordination Officer Malakand.					Service from 1/12/07 to 31/1/08 Verified from the office copies of Pay Bills and other records and found correct.		
<i>[Signature]</i> Asstt. Coordination Officer Malakand.	30/1/08						
<i>[Signature]</i> Asstt. Coordination Officer Malakand.							

	DATE	DESCRIPTION	AMOUNT	INITIALS	REMARKS
	10/1				
	10/2				
	10/3				
	10/4				
	10/5				
	10/6				
	10/7				
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	10/30				
	10/31				

10/1

NAME OF OFFICER
 RANK OR GRADE
 OFFICE AND DISTRICT
 (If Special Agent in Charge, add "SPECIAL AGENT IN CHARGE")
 SIGNATURE
 GRADE
 OFFICE AND DISTRICT

<p>2/11/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>
<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>
<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>
<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>
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<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>
<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>	<p>10/1/68</p>

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received

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15	14	13	12	11	10	9	8
Reference to records published or censured, or of praise of Government	Signature of the head of the office or other miscing officer	Allocation of period of leave or average pay, and signature of the head of the office or other miscing officer	Name of the head of the office or other miscing officer	Reason of termination (such as promotion, transfer, dismissal, etc.)	Date of termination	Signature and designation of the head of the office or other miscing officer in columns 1 to 8	
Pay roll covered by Govt. of K.P. Finance Dept. 14-21	[Signature]	Pay roll covered by Govt. of K.P. Finance Dept. 14-21	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]
	[Signature]	[Signature]	[Signature]	[Signature]	30/11	[Signature]	[Signature]

13-

13-5971

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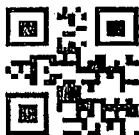
1	2	3	4	5	6	7	8
			12345				
	69900-4402310						
	B. S. M. R. O.						
NAME OF POLICE OFFICER AND APPOINTING OFFICE (1) SUPERVISOR (2) OFFICER (3) SERGEANT (4) PRIVATE (5) SQUAD LEADER (6) CHIEF OF POLICE (7) CHIEF OF DEPARTMENT (8) CHIEF OF DIVISION (9) CHIEF OF SECTION (10) CHIEF OF BRANCH (11) CHIEF OF STATION (12) CHIEF OF DISTRICT (13) CHIEF OF COUNTY (14) CHIEF OF STATE (15) CHIEF OF FEDERAL							

19-


Not-Verified

EMPLOYEE'S PROFILE CARD

'B'
-17-



NAME:	Sarwar khan
FATHER NAME:	amir nawaz khan
DATE OF BIRTH	03-04-1985
GENDER:	Male
CNIC NO:	15401-8656663-5
DOMICILE	MALAKAND
CONTACT #:	0316-9844966
CURRENT ADDRESS:	said mehmood kali sakhakot tehsil dargai disst:malakand
PERMANENT ADDRESS:	said mehmood kali sakhakot tehsil dargai disst:malakand
DATE OF INITIAL APPOINTMENT	11-04-2005
SERVICE STATUS:	Regular
Employee Type:	Civil Servant
DESIGNATION:	Class IV (BPS-4)



EMPLOYEE POSTING DETAIL

DISTRICT	Field Formations	DESIGNATION	BPS	FROM DATE	TO DATE	STATUS	TENURE
MALAKAND	AD-MALAKAND	Class IV	4	11-04-2005	TILL DATE	Active (on Duty)	17 years, 1 months, 5 days

Working Against Additional Charge

DISTRICT	Field Formations	DESIGNATION	BPS	FROM DATE	TO DATE	STATUS	TENURE
----------	------------------	-------------	-----	-----------	---------	--------	--------

Employee Qualification

DEGREE NAME	INSTITUTE	SUBJECT NAME	PERCENT MARKS	PASSING YEAR
-------------	-----------	--------------	---------------	--------------

Dist. Govt. KP-Provincial
District Accounts Office Malakand
Monthly Salary Statement (February-2022)



-18-

Personal Information of Mr SARWAR KHAN d/w/s of AMIR NAWAZ KHAN

Personnel Number: 00242068 CNIC: 1540186566655 NTN:
 Date of Birth: 03.04.1985 Entry into Govt. Service: 11.04.2005 Length of Service: 16 Years 10 Months 019 Days

Employment Category: Active Permanent

Designation: NAIB QASID 80002405-DISTRICT GOVERNMENT KHYBE
 DDO Code: MD6179-
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: 242068 GPF Interest applied GPF Balance: 116,629.00 (provisional)
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 04 Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,740.00	1001	House Rent Allowance 45%	2,187.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
1911	Compen Allow 20% (1-15)	1,000.00	2199	Adhoc Relief Allow @ 10%	913.00
2211	Adhoc Relief All 2016 10%	1,124.00	2224	Adhoc Relief All 2017 10%	1,474.00
2247	Adhoc Relief All 2018 10%	1,474.00	2264	Adhoc Relief All 2019 10%	1,474.00
2309	Adhoc Relief All 2021 10%	1,474.00	2311	Dress Allowance - 2021	1,000.00
2312	Washing Allowance 2021	1,000.00	2313	Integrated Allowance 2021	600.00

Deductions - General

Wage type		Amount	Wage type		Amount
3004	GPF Subscription	-830.00	3501	Benevolent Fund	-600.00
4004	R. Benefits & Death Comp:	-300.00			0.00

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.): 31,745.00 Deductions: (Rs.): -1,730.00 Net Pay: (Rs.): 30,015.00

Payee Name: SARWAR KHAN
 Account Number: PLS 3189-5
 Bank Details: NATIONAL BANK OF PAKISTAN, 230593 N.B.P SAKHAKOT MKD AGENCY N.B.P SAKHAKOT MKD AGENCY.

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: S/KOT
 City: MALAKAND Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address:
 City: Email: sarvarkhansk3@gmail.com

ID= 1210810224117

S.No.MB 013727

BOARD OF INTERMEDIATE & SECONDARY EDUCATION MALAKAND

CHAKDARA N.W.F.P. PAKISTAN

SECONDARY SCHOOL CERTIFICATE EXAMINATION

PROVISIONAL CERTIFICATE



"C"

-19-

Session 2009 (Supply)

Roll No: 4011

Group: Humanities

Sarwar Khan Son of Amir Nawaz Khan
 of MALAKAND AGENCY

has secured the marks shown against each subject in the Secondary School Certificate Examination held in the month of October as Private candidate.

Subject Name	Marks		MARKS OBTAINED				
	TH / A	PR / B	Theory / Paper-A	Practical / Paper-B	Total	In Words	
1. English	75	75	25	26	51	Fifty-One	
2. Urdu	75	75	43	36	79	Seventy-Nine	
3. Pakistan Studies	75		38		38	Thirty-Eight	
4. Islamic Education	75		32		32	Thirty-Two	
5. General Science	100		37		37	Thirty-Seven	
6. Islamic Studies	100		41		41	Forty-One	
7. Art & Model Drawing	40	60	17	22	39	Thirty-Nine	
8. Mathematics	75	75	25	25	50	Fifty Only	
Total = 900					Marks	367-D	Three Hundred Sixty-Seven
					Remarks		

Date of Birth (In Figures) 03 April 1985
 (In Words) Third, April One Thousand Nine Hundred Eighty-Five

Prepared By Fahid
 Checked By: Fahid

Note:- Errors/Omissions excepted. Any mistake in D.O.B & Name etc must be intimated within 30 days after receiving the above certificate.
 Computer Cell BISE Malakand
 25.11.2009, 10:57 AM

[Signature]
 Controller of Exams
 B.I.S.E, Malakand



**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MALAKAND**



Khyber Pakhtunkhwa, Pakistan

-20-



DETAILED MARKS & PROVISIONAL CERTIFICATE

HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

S.No.MBI 0114854

-207

INTERMEDIATE (ANNUAL) EXAMINATION, 2020

HUMANITIES (Part-II)

Reg: No. 35405-B:MKD-2010

Roll No: 368172

SARWAR KHAN

Son / Daughter of AMIR NAWAZ KHAN

Student of

Private Candidate of Malakand

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination (Annual) 2020 as a Private candidate.

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	33	--	As Per Part I	66	Sixty-Six	
Urdu	200	44	--	As Per Part I	88	Eighty-Eight	
Islamic Education	50	22	--		22	Twenty-Two	
Pakistan Studies	50	--	--	As Per Part I	22	Twenty-Two	
Civics	200	37	--	As Per Part I	74	Seventy-Four	
Islamic Studies	200	39	--	As Per Part I	78	Seventy-Eight	
Pashto	200	43	--	As Per Part I	86	Eighty-Six	
Total : 1100		Marks		436-E	Four Hundred Thirty-Six Only		

Checked by _____

Result Declaration Date: 28th July, 2020

- Note: 1. Errors / Omissions accepted. Any mistake in Name, etc must be intimated with in 30 days after receiving the above certificate.
2. The Marks awarded for part II is the best prediction of the performance based on the formula and guidelines approved by the Government and recognized by IBCC

25-July-2020

Controller of Examinations
B.I.S.E, Malakand.

Reg No PAL/CIT701

S.No 0020

PAL COMPUTER COLLEGE SAKHAKOT

PAL COMPUTER COLLEGE

Data Institute

Affiliated with Pakistan Education network Skill Development Council Peshawar

Mr/Mrs/Miss

Son/Daughter of

Successfully competed

1. Ms. Word

2. Ms. Excel

3. Internet

4. Ms. windows

5. Inpage

6. Adob photoshop

From Pal. Computer College Sakhakot Malakand as prescribed syllabus in Grade A1. In recognition thereof this Certificate of Achievement is awarded to him/her on June Day of 04 / 2011

Principal

Director

Reg. No. SDC/PCC/62667

S. No. 67826

Skill Development Peshawar Council

Established Under National Training Ordinance 1980

Competency Based Certificate



This is to certify that

Mr/Mrs/Miss SARWAR KHAN

Son/Daughter of AMIR NAWAZ KHAN

Has successfully completed a special training course organized by the SDC Peshawar

in the trade of CERTIFICATE IN INFORMATION TECHNOLOGY

held at PAL COMPUTER CENTRE, SAKHAKOT

From 15-11-2010

To 15-05-2011

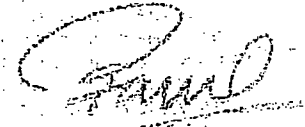
In recognition thereof this certificate is issued

On 15th

day of AUGUST-2011



PRINCIPAL



HAJI MUHAMMAD JAVED
CHAIRMAN
SDC PESHAWAR

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D-23

TENTATIVE SENIORITY LIST IN R/O NAIB QASIDS VC/NC DISTRICT MALAKAND AS STOOD ON 30/01/2018

S#	Name	Designation	Qualification	Division	Domicile	Date of Birth	Date of Appointment	Date of Adjustment	Scale	Name of VC/NC	Remarks
1	Said Akbar Shah	Naib Qasid	Nil	Nil	Malakand	10-03-66	21-08-86	09-10-01	4	Sakhakot	
2	Sher Mula	Naib Qasid	Nil	Nil	Malakand	01-07-64	29/09/1986		3	Maina	
3	Amir Nawaz Khan	Naib Qasid	Nil	Nil	Malakand	01-01-62	12-03-90	21-09-01	4	Arab Danda	
4	Shah Sawood Bacha	Naib Qasid	Nil	Nil	Malakand	01-07-68	24/06/1990	09-10-01	3	Mucha Khell	
5	Jamshid	Naib Qasid	Nil	Nil	Malakand	02-02-71	12-02-91	09-10-01	4	Malakand	
6	Gulim Shah	Naib Qasid	Nil	Nil	Malakand	01-01-71	21/03/1991		3	Dobandai	
7	Shah Jehan	Naib Qasid	Nil	Nil	Malakand	01-07-66	18/08/1991		3	Meherdai	
8	Shamshir Ali	Naib Qasid	FA	2nd	Malakand	22-02-73	09-06-92	21-09-01	4	Wartair	
9	Sher Rahman	Naib Qasid	Matric	2nd	Malakand	01-04-67	07-06-93	09-10-01	4	Jalala	
10	Fazli Hameed	Naib Qasid	Matric	3rd	Malakand	16-03-68	04-10-93	21-09-01	4	Danda	
11	Fazli Subhan	Naib Qasid	Matric	3rd	Malakand	02-02-75	01-11-94		3	Haryan Kot	
12	Rahmani Mulk	Naib Qasid	Nil	Nil	Malakand	01-01-76	28/03/1995	21/05/2005	3	Pirkheil	
13	Said Malik	Naib Qasid	FA	2nd	Malakand	01-02-77	10-02-98	21/09/2001	3	Kharki De hari	
14	Umar Nazif	Naib Qasid	Nil	Nil	Malakand	01-01-71	11-04-05	04-11-05	4	Kharkai	
15	Rashid Khan	Naib Qasid	Nil	Nil	Malakand	02-11-80	11-04-05	04-11-05	4	Din Abad	
16	Sarwar Khan	Naib Qasid	Nil	Nil	Malakand	03-04-85	11-04-05	04-11-05	3	Ghwando Bala & Payeen	
17	Shahab Hussain	Naib Qasid	BA	Matric 1st	Malakand	04-03-85	11-04-05	11-04-05	4	Bazid Kheit	
18	Salman Khan	Naib Qasid	Matric	3rd	Malakand	08-03-83	15-04-05	11-04-05	4	Chesti Baba	

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OFFICE OF THE ASSISTANT DIRECTOR LG & RDD MALAKAND

No. 17002/ADLG&RDD/MKD

Date: 07/08/2018

OFFICE ORDER:

Consequent upon the recommendation of Departmental Selection Committee on 07/08/2018, the undersigned is pleased to promote the following Naib Qasids BPS-03/04 to the post of Junior Secretary BPS-09 with immediate effect in the best interest of public:

S. No.	Name of incumbent	BPS	Place of posting promote to Junior Secretary BPS-09 and posted VC/NC
1	Shamshir Ali	04	VC Khan Garj
2	Sher Rahman	04	VC Baba Kheil
3	Said Malik	04	NC Qaldara
4	Shahab Hussain	04	VC Bala Batkhela
5	Zahiq Hussain	03	VC Qalangai
6	Muhammad Sajid	03	VC Mubarak Kheil
7	Sana Ullah	03	VC Koza Atteya

J-10

Assistant Director
LG&RDD, Malakand

No. 17003-9/ADLG/MKD even dated

Copy forwarded for information to:

1. The Director General LG&RDD, Khyber Pakhtunkhwa Peshawar
2. The District Nazim District Govt, Malakand
3. The Deputy Commissioner, Malakand
4. The District Accounts Officer, Malakand
5. The Supervisor LG&RDD, Malakand
6. The Nazim VC/NC concerned.
7. The Secretary VC/NC Concerned for compliance.

Assistant Director
LG&RDD, Malakand

ATTESTED

To

"F" - 25 -

The Director General LG&RD Department,
Khyber Pakhtunkhwa, Peshawar.

Subject:- DEPARTMENTAL APPEAL AGAINST THE OFFICE ORDER OF ASSISTANT DIRECTOR LG & RD DEPARTMENT MALAKAND DATED 07-08-2018 WHEREBY ONE SHAHAB HUSSAIN NAIB QASID WHO IS JUNIOR TO THE APPELLANT HAS BEEN PROMOTED TO THE POST OF JUNIOR SECRETARY (BPS-09) WHILE THE APPELLANT HAS BEEN IGNORED

R/Sir,

It is humbly submitted that the appellant is serving as Naib Qasid (BPS-04) since 11-04-2005 however, despite serving for almost 16/17 years I have not been promoted onward as required under the law and rules. That it is pertinent to mention here that as per seniority list the name of the undersigned is mentioned at S.No.15 while one Mr. Shahab Hussain Naib Qasid who is junior to me is enlisted at S.No. 17 of the seniority list issued by the Department. That despite of that the ibid junior colleague of the appellant has been promoted to the post of Junior Village secretary vide impugned order dated 7.8.2018 while the appellant has been ignored.

Forgoing in view, It is humbly requested that the Impugned order dated 7.8.2018 may kindly be set aside to the extent of Mr. Shahab Hussain and the appellant may kindly be considered for promotion to the post of Junior Secretary (BPS-09) with all back benefits including seniority and oblige.

Dated -1/8/2022

Yours obediently


Sarwar Khan

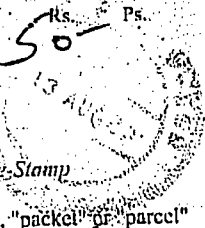
Naib Qasid, Village Council Ghwando,
District Malakand

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No. 546

RGLB1902744

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
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Date Stamp

*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.
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Insured for Rs. (in figures) 5000 (in words) _____

Insurance fee Rs. _____ Ps. _____ (in words) } Weight } Kilo
Grams

Name and
address
of sender } _____

"H" -27-

Sr. No	Nomenclature of the posts		Qualification		Age		Method of Recruitment/Appointment		Reasons/Remarks
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	
				b) Speed of 50 words per minute in shorthand in English and 35 words per minute in typing; and c) Knowledge of computer in using MS Office.					promotion quota is proposed to be added to the initial recruitment quota. To bring it at par to the Service Rules of other departments.
16	Junior Village Council Secretary				18 to 30 years			(i) Twenty percent (20) % by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids and Chowkidars in the Village Council/Neighborhood Council with seniority at Tehsil level, having at least Secondary School Certificate, from a recognized Board or Institute and having Six months Certificate in Computer from a recognized Board/Institute with three (03) year service as such; (ii) 80% by initial recruitment.	
17.	Junior Clerk			i) FA/ F.Sc with second division or equivalent qualification from a	18 to 30 years.			(i) 20% by promotion from amongst Naib Qasids, Chowkidars and Sweepers including holders of other equivalent posts who have the minimum qualification	To upgrade the qualification and bring it at par with the Service Rules of Establishment Department.

Sr. No	Nomenclature of the posts		Qualification		Age		Method of Recruitment/Appointment		Reasons/Remarks
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	
9	Work Munshi			FA/FSc or equivalent qualification from a recognized Board.					
10	Supervisor		At least Second Class Bachelors' Degree from a recognized University.			Not less than 21 years and not more than 28 years.		i. Seventy Five Percent by promotion, on the basis of seniority cum-fitness from amongst the Senior Village/Neighborhood Council Secretary at District Level with at least Five years' service as such; and ii. Twenty Five percent by Initial Recruitment. <u>Note:</u> For the purpose of promotion, a joint seniority of Senior Village /Neighborhood Council Secretaries of all Tehsil within District shall be maintained at District level by the Assistant Director Senior at District Head Quarter Tehsil.	As the post of Supervisor is in BPS-14 and is in the Competency of DGLG, so their initial recruitment will be on zonal basis as per Esta Code.
12.	Junior Scale Stenographer BPS-14			a) Intermediate or equivalent qualification from a recognized board; and		18 to 30 Years.		100% per cent by initial recruitment.	Reason: As the post of Steno typist is a feeding cadre to the post of Junior Scale Stenographer and there is no feeding cadre of steno typist, therefore the 50 percent

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Sr. No	Nomenclature of the posts		Qualification		Age		Method of Recruitment/Appointment			Reasons/Remarks
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Proposed	
				recognized Board; and ii) a speed of thirty (30) Words per minute in typing.					prescribed for initial recruitment. (ii) 80% by initial recruitment.	To bring it at par with the Service Rules of Establishment Department.

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VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2022

Sarwar Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Local Govt etc

(RESPONDENT)
(DEFENDANT)

I/We (Appellant)

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** 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 cost. 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.

Dated. ____/____/2022

CLIENT سرور خان

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT
(BC-10-0858)
(15401-0705985-5)

UMAR FAROOQ MOHMAND

WALEED ADNAN

&

MUHAMMAD AYUB
ADVOCATES

OFFICE:

Flat No. (TF) 291*-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)